

STATE OF NEBRASKA 2020 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE



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**2020 STATE OF NEBRASKA
ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE**



Prepared for the:
The Nebraska Department of Economic Development

Prepared by:
Western Economic Services, LLC
212 SE 18th Avenue
Portland, OR 97214
Phone: (503) 239-9091
Toll Free: (866) 937-9437
Fax: (503) 239-0236

Website: <http://www.westernes.com>

**Final Report
June 12, 2020**

Has Your Right to Fair Housing Been Violated?

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

Kansas City Regional Office of FHEO

U.S. Department of Housing and Urban Development
Gateway Tower II
400 State Avenue, Room 200
Kansas City, Kansas 66101-2406
(913) 551-6958
1-800-743-5323
TTY (913) 551-6972

Nebraska Equal Opportunity Commission

Main Office
Nebraska State Office Building
301 Centennial Mall South, 5th Floor
PO Box 94934
Lincoln, NE 68509-4934
Telephone: (402) 471-2024
Toll Free: (800) 642-6112
Fax: (402) 471-4059

Fair Housing Center of Nebraska-Iowa

Main Office
2401 Lake Street
Omaha, NE 68111
(402) 934-7921
<http://fhasinc.org>

High Plains Community Development Corporation

130 East Second Street
Chadron, NE 69337
Phone: 308.432.4346
Toll Free: (866) 432-4346
Fax: (308) 432-4655
highplains@highplainscdc.com

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Section I. Executive Summary

Overview

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

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

Assessing Fair Housing

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

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

In July of 2015, HUD released a new AFFH rule which provided a format, a review process, and content requirements for the newly named “Assessment of Fair Housing”, or AFH.⁵ The assessment would now include an evaluation of equity, the distribution of community assets, and access to opportunity within

¹ https://www.hud.gov/program_offices/fair_housing_equal_opp/fair_housing_and_related_law

² § 5.152 Affirmatively Furthering Fair Housing

³ § 5.152 Affirmatively Furthering Fair Housing

⁴ 42 U.S.C.3601 et seq.

⁵ 80 FR 42271. <https://www.federalregister.gov/documents/2015/07/16/2015-17032/affirmatively-furthering-fair-housing>

the community, particularly as it relates to concentrations of poverty among minority racial and ethnic populations. Areas of opportunity are physical places within communities that provide things one needs to thrive, including quality employment, high performing schools, affordable housing, efficient public transportation, safe streets, essential services, adequate parks, and full-service grocery stores. Areas lacking opportunity, then, have the opposite of these attributes.

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

However, on January 5, 2018, HUD issued a notice that extended the deadline for submission of an AFH by local and state government consolidated plan program participants to their next AFH submission date that falls after October 31, 2020.⁶ Then, on May 18, 2018, HUD released three notices regarding the AFFH; one eliminated the January 5, 2018, guidance; a second withdrew the on-line Assessment Tool for local government program participants; and, the third noted that the AFFH certification remains in place. HUD went on to say that the AFFH databases and the AFFH Assessment Tool guide would remain available for the AI; and, encouraged jurisdictions to use them, if so desired.

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

In accordance with the applicable statutes and regulations governing the Consolidated Plan, Nebraska Department of Economic Development and Nebraska Department of Health and Human Services (DHHS) 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.

Socio-Economic Context

While the population in Nebraska is growing, the racial and ethnic makeup of the area is not changing significantly. There are areas in the State, however, that do see high concentrations of Native American and Hispanic residents. The population is also aging, with those aged 65 and older growing at the fastest rate in the State. Limited English Proficiency includes a 3.4 percent, or 59,587 persons of the population speaks Spanish at home, followed by 0.4 percent or 7,523 persons speaking Other Asian and Pacific Island languages. In 2018, some 90.9 percent of households had a high school education or greater, including 26.6 percent with a high school diploma or equivalent, 35.6 percent with some college, 19.5 percent with a Bachelor's Degree, and 9.2 percent with a graduate or professional degree.

⁶ 83 FR 683 (January 5, 2018)

In 2018, unemployment in the State was at 3.5 percent. This is representative of a labor force of 1,030,381 people and 993,836 people employed. Real per capita income has continued to grow in recent years. However, poverty has grown to 12.0 percent, representing 220,330 persons living in poverty in the State.

The State experienced a drop-off in housing production during the recent recession, which has leveled off since that time. In 2018, there were 7,866 total units produced in the study area, with 4,900 of these being single-family units. The value of single-family permits, however, has continued to rise, reaching \$220,051 in 2018. Since 2010, the study area has not seen an increase in the proportion of vacant units, however there has been a rise in the proportion of “other” vacant units.

Definitions

Fair Housing Choice - HUD’s definition of “fair housing choice” means the ability of persons, regardless of race, color, religion, sex, handicap, familial status, or national origin, of similar income levels to have available to them the same housing choices.

Fair Housing Issue – HUD defines a fair housing issue as a condition in a program participant’s geographic area of analysis that restricts fair housing choice or access to opportunity, and includes such conditions as ongoing local or regional segregation or lack of integration, racially ethnically concentrated areas of poverty, significant disparities in access to opportunity, disproportionate housing needs, and evidence of discrimination or violations of civil rights law or regulations related to housing.⁷

Contributing Factors – is a factor that creates, contributes to, perpetuates, or increases the severity of one or more fair housing issues.

Segregation – For the purposes of this study segregation is defined using the Dissimilarity Index in Section IV.B. This dissimilarity index calculates how evenly two demographic groups are distributed throughout an area.

Racially or Ethnically Concentrated Areas of Poverty - Racially or ethnically concentrated areas of poverty (R/ECAPs) are Census tracts with relatively high concentrations of non-white residents living in poverty. This is calculated at a rate of at least 50 percent non-white population and at least 40 percent poverty rate. This is discussed in more detail in Section IV.C.

Opportunity Indices – Opportunity Index ratings are defined by calculations shown in Section IV.D. 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. Disparities in access to opportunity inspects whether a select group, or certain groups, have lower or higher levels of access to these community assets. These indices include: low poverty, school proficiency, job proximity, labor market engagement, transportation trips, low transportation cost, and environmental health.

Low Poverty Index – A measure of family poverty by household (based on the federal poverty line) to measure exposure to poverty by neighborhood.

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

⁷ <https://files.hudexchange.info/resources/documents/AFFH-Rule-Guidebook.pdf>

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

Housing Problems – Housing problems are defined by HUD to mean overcrowding, incomplete kitchen facilities, incomplete plumbing facilities, or cost burdens (paying more than 30 percent of household income on housing costs).

Overview of Findings

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

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

1. High: Factors that have a direct and substantial impact on fair housing choice, or that Nebraska Department of Economic Development has no authority or limited authority to mandate change, and no capacity or limited capacity to address.
2. Medium: Factors that have a less direct impact on fair housing choice, or that Nebraska Department of Economic Development has limited authority to mandate change.
3. Low: Factors that have a slight or largely indirect impact on fair housing choice, or that Nebraska Department of Economic Development has limited capacity to address.

Contributing Factors	Priority	Justification
Moderate to high levels of segregation	High	In 2017, black, American Indian, Asian, Native Hawaiian, “other” race, and Hispanic households had a moderate to high level of segregation, according to the Dissimilarity Index.
Access to low poverty areas and concentrations of poverty	High	Low poverty index is markedly lower for black, Native American, and Hispanic populations than white school proficiency, indicating inequitable access to low poverty areas. In addition, there are concentrations of poverty in the State, particularly in the urban centers and spread in the rural parts of the State.
Access to labor market engagement	Med	Black, Native American, and Hispanic households have less access to labor market engagement as indicated by the Access to Opportunity index. However, the State has little control over impacting labor market engagement on a large scale.
Access to School Proficiency	Med	Black, Native American, and Hispanic households have lower levels of access to proficient schools.
Insufficient affordable housing in a range of unit sizes	High	Some 25.0 percent of households have cost burdens. This is more significant for renter households, of which 39.3 percent have cost burdens. In addition, some 60.1 percent of households below 30 percent HAMFI have cost burdens. This signifies a lack of housing options that are affordable to a large proportion of the population.
Black, Asian, American Indian, and Hispanic households have disproportionate rates of housing problems	High	Black, Asian, American Indian, and Hispanic households face a disproportionate share of housing problems. The statewide average rate of housing problems is 26.0 percent, while the black households face housing problems at a rate of 46.8 percent, Asian households at a rate of 37.0 percent, American Indian households at a rate of 43.3 percent, and 38.9 percent for Hispanic households.
Discriminatory patterns in Lending	Med	The mortgage denial rates for black, Native American, and Hispanic households are higher than the jurisdiction average according to 2008-2018 HMDA data.
Insufficient accessible affordable housing	High	The number of accessible affordable units may not meet the need of the growing elderly and disabled population, particularly as the population continues to age. Some 47.4 percent of persons aged 75 and older have at least one form of disability.
Lack of fair housing infrastructure	High	The fair housing survey and public input indicated a lack of collaboration among agencies to support fair housing.
Insufficient fair housing education	High	The fair housing survey and public input indicated a lack of knowledge about fair housing and a need for education.
Insufficient understanding of credit	High	The fair housing survey and public input indicated an insufficient understanding of credit needed to access mortgages.

FAIR HOUSING ISSUES, CONTRIBUTING FACTORS, AND PROPOSED ACHIEVEMENTS

Table I.2 summarizes the fair housing issues/impediments and contributing factors, including metrics, milestones, and a timeframe for achievements.

Table I.2

Fair Housing Goal	Impediments to Fair Housing Choice/ Contributing Factors	Fair Housing Issue	Recommended Actions
Promote homeownership and rental opportunities in high opportunity areas	Moderate to high levels of segregation Access to low poverty areas and concentrations of poverty Insufficient affordable housing in a range of unit sizes Black, Asian, American Indian, and Hispanic households have disproportionate rates of housing problems Discriminatory patterns in Lending	Segregation R/ECAPs Disproportionate Housing Need	Continue to promote homeownership and affordable rental opportunities in high opportunity areas with the use of CDBG, HOME, and HTF funds. Over the next five (5) years: 260 rental units added 600 homeowner units added 100 rental units rehabilitated 650 homeowner housing units rehabilitated Track activities annually in the State’s PER.
Promote community and service provider knowledge of ADA laws	Insufficient accessible affordable housing	Disability and Access	Increase outreach and education for housing providers in the state, focusing on legal requirements concerning reasonable accommodation, in coordination with local disability advocate organizations. Record activities annually.
Enhance community services in R/ECAPs	Access to low poverty areas and concentrations of poverty Access to job proximity Access to school proficiency	Disparities in Access to Opportunity	Encourage increased public services and public investment in R/ECAPs and high poverty areas in the State. Record activities annually.
Increase outreach and education for housing providers in the state	Access to low poverty areas and concentrations of poverty Moderate to high levels of segregation Access to low poverty areas and concentrations of poverty Moderate to high levels of segregation Discriminatory patterns in Lending	Fair Housing Enforcement and Outreach	Continue to raise awareness and educate buyers through enhanced home purchase and credit education, through seminars, webinars and other outreach efforts. Record activities annually. Continue to devote resources to testing and enforcement activities. Raise awareness and educate landlords and property management companies about fair housing law and raise awareness and educate housing consumers about fair housing rights. Conduct 100 fair housing tests annually. Record activities annually. Continue to train community representatives on housing law, including education about the fair housing complaint system, Limited English Proficiency, as well as design and construction standards at the CDBG certification training. Record activities annually. Conduct fair housing training sessions with state and local government employees whose work directly impacts housing and community development policy. Continue to support statewide conferences such as the Nebraska Workforce Housing Forum, Housing Innovation Marketplace Conference, and Commission on Human Rights Civil Rights Conference. Record activities annually. Continue to provide fair housing information to the public through the DED office and website, as well as utilizing Limited English Proficiency materials for fair housing education. Record activities annually.

Section II. Community Participation Process

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

A. OVERVIEW

The outreach process included the Fair Housing Survey, Fair Housing Forums, 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, 340 responses have been received.

The Fair Housing Forums were held on January 30th at the Bennett Martin Public Library (136 S 14th Street Lincoln, NE, February 6th via webinar, and February 13th, 2020 via webinar.

The Draft for Public Review AI will be made available on March 23rd, 2020 and a 30-day public input period was initiated.

A public hearing will be held on April 14th, 2020 during the public review period in order to gather feedback and input on the draft Analysis of Impediments. After the close of the public review period and inspection of comments received, the final draft was made available in May 2020.

B. THE FAIR HOUSING SURVEY

The purpose of the survey, a relatively qualitative component of the AI, was to gather insight into knowledge, experiences, opinions, and feelings of stakeholders and interested citizens regarding fair housing as well as to gauge the ability of informed and interested parties to understand and affirmatively further fair housing. Many individuals and organizations throughout the State of Nebraska invited to participate. At the date of this document, some 340 responses were received. A complete summation of survey responses can be found in ***Section IV.I Fair Housing Survey Results***.

C. FAIR HOUSING FORUM

Fair Housing Forums were held on January 30th, February 6th, and February 13th, 2020. The January 30th meeting was held in Lincoln, Nebraska, while the February meetings offered additional input opportunities through webinars. The complete transcripts from these meetings will be included in the Appendix.

D. THE FINAL PUBLIC REVIEW PROCESS

A 30-day public review process was held from March 23, 2020 through April 21, 2020. It included a public review meeting on April 14, 2020. A summary of the comments received during this meeting will be included below. The complete transcript from this meeting will be included in the Appendix.

Section III. Assessment of Past Goals and Actions

An Analysis of Impediments to Fair Housing Choice for the State of Nebraska was last completed in 2011. The conclusions drawn from this report are outlined in the following narrative.

A. PAST IMPEDIMENTS AND ACTIONS

The conclusions of the 2011 Analysis of Impediments are included below:

Private Sector

1. *Impediment:* Discriminatory terms and conditions offered in the rental markets

Discussion: Analysis of findings from the literature review, complaint data, fair housing survey, and fair housing forum all supported the notion that discriminatory terms and conditions were encountered in the rental market in the non-entitlement areas of Nebraska; “discriminatory terms and conditions” refers to differences in leasing agreements or arrangements such as requiring higher monthly rents or deposits based on protected class status, including race, national origin, and disability

Suggested Actions: Devote resources to testing and enforcement activities. Raise awareness and educate landlords and property management companies about fair housing law, and raise awareness and educate housing consumers about fair housing rights

Measurable Outcomes: Acquire services to conduct 100 tests per year. Hire contracted services to conduct four seminars, webinars, and other outreach activities per year to reach housing providers and consumers and enhance their knowledge of fair housing, and actively participate in April’s Fair Housing Month by attending at least four conferences and public presentations

2. *Impediment:* Failure to make reasonable accommodations or modifications

Discussion: Failure to allow service animals or accessibility renovations for persons with disabilities was found in the complaint review and the fair housing survey

Suggested Actions: Devote resources to testing and enforcement activities. Hold training sessions to raise awareness and educate housing providers in requirements regarding reasonable accommodation or modification

Measurable Outcomes: Acquire services to conduct 100 tests per year. Hire contracted services to conduct four seminars, webinars, and other outreach activities per year to reach housing providers and consumers and enhance their knowledge of fair housing; and actively participate in April’s Fair Housing Month by attending at least four conferences and public presentations

3. *Impediment:* Refusal to rent by rental property managers

Discussion: Claims of refusal to rent to certain protected classes, including race, national origin, and disability, by rental property managers, was documented in the complaint review and the fair housing survey

Suggested Actions: Devote resources to testing and enforcement activities. Raise awareness and educate landlords and property management companies about fair housing law, and raise awareness and educate housing consumers about fair housing rights

Measurable Outcomes: Acquire services to conduct 100 tests per year. Hire contracted services to conduct four seminars, webinars, and other outreach activities per year to reach housing providers and consumers and enhance their knowledge of fair housing; and actively participate in April's Fair Housing Month by attending at least four conferences and public presentations

4. *Impediment:* Steering in the real estate markets

Discussion: Steering, which refers to directing housing consumers toward or away from certain properties or areas based on factors such as race, national origin, or familial status, was found in housing complaint data

Suggested Actions: Devote resources to testing and enforcement activities. Communicate this problem to the Nebraska Real Estate Commission (NREC); continue to offer outreach, education, and awareness activities for real estate agents; and identify fair housing education classes and availability of classes for real estate agents

Measurable Outcomes: Acquire services to conduct 100 tests per year. Establish communication with the NREC; hire contracted services to conduct four seminars, webinars, and other outreach activities per year to reach housing providers and consumers and enhance their knowledge of fair housing; and actively participate in April's Fair Housing Month by attending at least four conferences and public presentations

5. *Impediment:* Denial of home purchase loans

Discussion: Evaluation of home loan data as well as results of the fair housing survey documented issues of denial of home purchase loans in the mortgage market based on race and national origin

Suggested Actions: Raise awareness and educate buyers through enhanced home purchase and credit education

Measurable Outcomes: Hire contracted services to conduct four seminars, webinars, and other outreach activities to reach housing consumers and enhance their knowledge of fair housing

6. *Impediment:* Issuance of predatory-type loans in the home purchase markets

Discussion: Predatory lending activities, or issuance of high interest rate loans, are an impediment to fair housing choice for the protected classes of race and national origin

Suggested Actions: Raise awareness and educate buyers through enhanced home purchase and credit education

Measurable Outcomes: Hire contracted services to conduct four seminars, webinars, and other outreach activities per year to reach housing consumers and enhance their knowledge of fair housing

7. *Impediment:* Discriminatory terms and conditions relating to sale

Discussion: The offering of discriminatory terms and conditions in the sale of housing, which may refer to such issues as requiring disparate down payments for some protected classes, was supported by findings from complaint data

Suggested Actions: Devote resources to testing and enforcement activities. Raise awareness and educate property sellers, real estate brokers, and real estate agents about fair housing law, and raise awareness and educate housing consumers about fair housing rights

Measurable Outcomes: Acquire services to conduct 100 tests per year. Hire contracted services to conduct four seminars, webinars, and other outreach activities per year to reach housing providers and consumers and enhance their knowledge of fair housing, and actively participate in April's Fair Housing Month by attending at least four conferences and public presentations

Public Sector

1. *Impediment:* Lack of statewide fair housing cooperation

Discussion: Analysis of findings from the fair housing survey, the non-entitlement community survey, and the fair housing forum showed that there is a lack of coordination between some agencies, such as the DED, NEOC, High Plains CDC, and FHC, to cooperate in affirmatively furthering fair housing in the non-entitlement areas of the state

Suggested Actions: Evaluate possible causes of inadequate fair housing cooperation on a local and statewide scale, work to resolve these inadequacies, and monitor progress

Measurable Outcomes: Draft a position paper on reasons for inadequate fair housing cooperation and the best methods to overcome these institutional barriers in the first year; in years two through five, form a working group of fair housing agencies in the state to resolve barriers

2. *Impediment:* Shortage of fair housing services

Discussion: A shortage of fair housing services in the non-entitlement areas of the state and few testing and enforcement activities were documented in the fair housing survey and the fair housing forums

Suggested Actions: Communicate to HUD that the NEOC is falling short of its commitment to fair housing, increase and advertise available complaint venues, raise awareness, and educate public on how to file a fair housing complaint with HUD

Measurable Outcomes: In year one, draft letter to HUD describing the fragmented fair housing system and the lack of coordinated activity in affirmatively furthering fair housing, outreach, and other activities taken to enhance coordination between the DED, NEOC, FHC, and High Plains

CDC; and broadly advertise access to the fair housing complaint system and put easily identifiable links on the DED website in years two through five. Participate with FHC, High Plains CDC, and NEOC during April Fair Housing Month outreach and education activities

3. *Impediment:* Inadequate fair housing outreach and education activities

Discussion: The literature and case review, the fair housing survey, and the fair housing forum indicated that there is a lack of adequate fair housing outreach and education activities in the non-entitlement areas of the state

Suggested Actions: Increase frequency of outreach and education activities, including webinars, seminars, and other means of improving understanding of fair housing; and increase frequency of testing and enforcement activities

Measurable Outcomes: Hire contracted services to conduct four seminars, webinars, and other outreach activities per year to reach housing providers and consumers and enhance their knowledge of fair housing, and actively participate in April's Fair Housing Month by attending at least four conferences and public presentations

4. *Impediment:* Lack of actions for affirmatively furthering fair housing by CDBG sub-recipients

Discussion: CDBG sub-recipients, who receive funding from the State, should engage in adequate actions to affirmatively further fair housing through efforts such as displaying fair housing posters and participating in Fair Housing Month

Suggested Actions: Establish more identifiable guidelines to ensure that sub-recipients are working to affirmatively further fair housing in their communities

Measurable Outcomes: In year one, discuss with High Plains CDC and the FHC pertinent monitoring guidelines; then implement enhanced monitoring methods and prepare a one-page exhibit of existing sub-recipients and efforts completed in monitoring; and in subsequent years, encourage High Plains CDC and the FHC to review these monitoring results and enhance monitoring opportunities

5. *Impediment:* Lack of collaboration among fair housing agencies to contribute to the AI process

Discussion: A lack of willingness of fair housing agencies to contribute to the AI process was observed

Suggested Actions: Report to HUD on an annual basis regarding agencies participating in fair housing dialogue and engaging the spirit of affirmatively furthering fair housing; evaluate existing contributions of fair housing agencies to the AI process; and encourage greater interest in furthering fair housing across the state

Measurable Outcomes: Assemble informational letter to HUD citing all state agencies and fair housing agencies that participated in fair housing activities and include this narrative in the Consolidated Annual Performance and Evaluation Report (CAPER) each year

6. *Impediment:* Lack of local fair housing policies, ordinances, or regulations

Discussion: Some communities do not have standing fair housing policies, ordinances, or other regulations that enhance efforts to affirmatively further fair housing

Suggested Actions: Encourage establishment of local fair housing policies, ordinances, or regulations that affirmatively further fair housing and monitor change

Measurable Outcomes: Annually, determine which sub-recipients have fair housing ordinances, policies, or regulations and obtain copies of these records; select best examples; and encourage other sub-recipients to adopt such policies and plans

7. *Impediment:* Language barriers in permitting processes

Discussion: Comments gathered from the fair housing survey suggested that language barriers within the housing permitting process serve as an impediment to fair housing choice

Suggested Actions: Encourage local communities to offer required materials in alternate language formats, and offer assistance in provision of these materials

Measurable Outcomes: Review local jurisdiction permitting processes for language barriers; select best examples and track number of languages offered, and offer technical assistance for translating such materials annually

FAIR HOUSING ACTIVITIES

The State's Activities, as described by their 2018 Performance and Evaluation Report (PER) is described below.

DED recognizes that it can, and when appropriate does, take action to overcome impediments to fair housing choice within the State of Nebraska. During the 2018 Program Year, DED staff undertook the following actions:

- Trained community representatives on housing law, including education about the fair housing complaint system, Limited English Proficiency, as well as design and construction standards at the CDBG certification training May 7-10, 2019, and one CDBG re-certification training October 2 – 5, 2018.
- On October 23, 2018 the Nebraska Workforce Housing Forum was held in Kearney, Nebraska at the Younes Conference Center. The event was sponsored by the Nebraska Investment Finance Authority (NIFA), Nebraska Department of Economic Development (DED), Nebraska Housing Developer's Association (NHDA), Nebraska Public Power District (NPPD), and Midwest Housing Development Fund, Inc. (MHDF). Attendees were able to hear from a variety of community leaders and partners regarding the needs and opportunities for workforce housing throughout Nebraska.
- Attended the annual Housing Innovation Marketplace Conference on March 19-20, 2018, which brings together more than 600 community leaders and housing partners from across Nebraska and the country to discuss affordable housing and community development. This conference offers educational sessions, networking opportunities with colleagues and great exhibitors, and creates an environment for financial resources, communities and developers to come together to stimulate the creation of affordable housing development in Nebraska.
- Co-sponsored and attended the Lincoln Commission on Human Rights Civil Rights Conference, on April 17, 2019, in Lincoln, Nebraska. Several sessions focused on housing including: "Service

Animals vs Emotional Support Animals”; “Housing Fair Act 1968 Overview”; and “Hot Topics in Fair Housing”.

LEP Program

The Limited English Proficiency Program training materials of the DED Affordable Housing Program includes a training video which state staff can use that addresses the basics of the Fair Housing Act and associated information. This video can be used to train housing organizations that have been awarded Federal housing funds.

Fair Housing Information

Fair housing information pamphlets are available to the public at the DED Affordable Housing Program office. An Equal Housing Opportunity icon link to the U.S. Department of Housing and Urban Development website section concerning Fair Housing is posted on the Nebraska DED website.

The current Analysis of Impediments to Furthering Fair Housing is available on the DED website and has additional information regarding actions that are proposed for the upcoming years.

Strategy Review

During the 2018 Program Year, the State reviewed its strategy to affirmatively further fair housing which included:

- Testing, enforcement, and education for landlords and property managers to better understand some barriers to affordable housing;
- Improvements to guidance on barriers to affordable housing and monitoring by DED;
- Educating grantees about potential barriers to affordable housing.

Other Actions

- Evaluating ways in which to attract additional residential contractors, particularly those that are willing to construct moderate priced homes in communities. Some incentives have been proposed which include: providing zero interest loans to contractors to build residential units; providing low priced or free residential lots for development; and also, to provide additional points in housing applications for those applicants that compile lists of interested contractors that may work on projects if applications are funded;
- Working with developers and contractors to identify any cost saving measures that might be appropriate to implement in order to save on the cost of materials and labor. In some instances, the State is able to partner with community colleges and high school students who are interested in the trades in working on the development of residential units. These collaborative efforts have been utilized in some housing projects and are encouraged within project development.
- Partnering with housing developers, non-profit entities, and communities in creating additional housing stock throughout the state.
- Working to assist in infrastructure improvements and development for residential areas. This is completed through many of the State's initiatives including through Nebraska affordable housing programs.
- The State will continue to improve the housing conditions of persons who are living in substandard housing by assisting within owner occupied rehabilitation and new residential construction of quality affordable housing.
- The State will continue to reduce the risk of lead based paint hazards in aging housing stock by continuing lead based compliance and reduction efforts for houses that are assisted with state and federal resources.

Section 3

The State provided training to grant administrators on Section 3 outreach and responsibilities. In addition, the State modified and provided Certification as a Section 3 Resident and Certification as a Section 3. Business Concern forms made easily accessible on the Department website for communities to use for Certification and outreach to Section 3 residents and businesses.

State's Actions to Increase WBE/MBE Participation

The state provided guidance and training to administrators and grantees on appropriate procurement and bidding procedures to allow for more WBE/MBE business opportunities.

Section IV. Fair Housing Analysis

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

Lead Agency and Service Area

The Nebraska Department of Economic Development and Department of Health and Human Services are the lead agency undertaking this Analysis of Impediments to Fair Housing Choice.

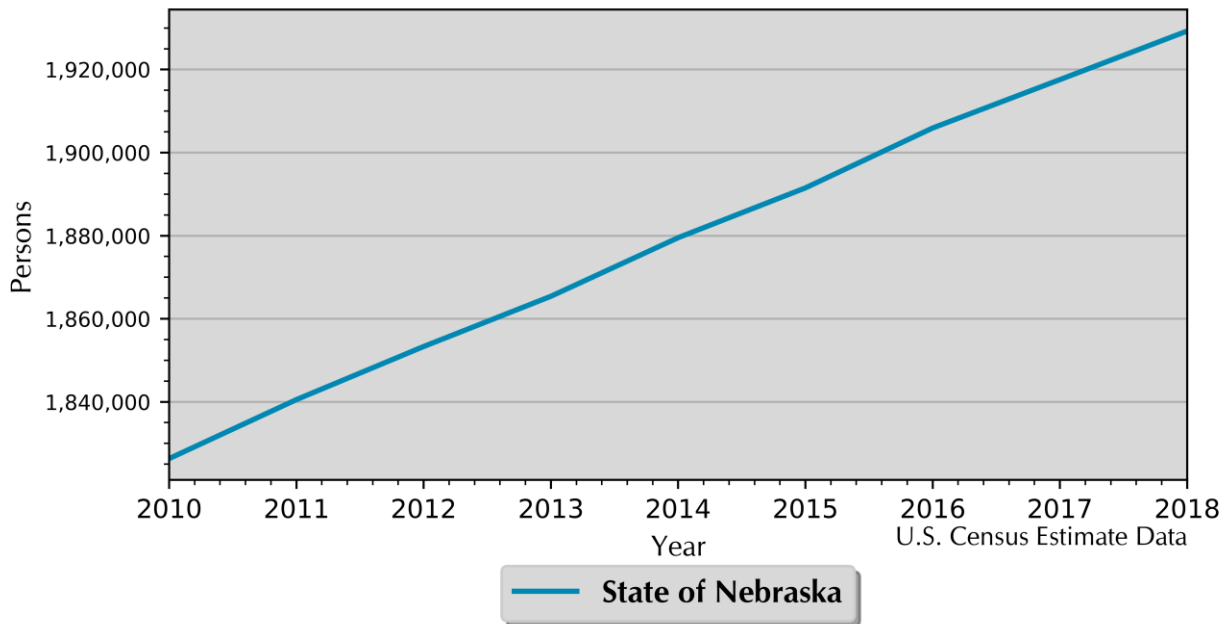
A. SOCIO-ECONOMIC OVERVIEW

Demographics

The Census Bureau’s current census estimates for each year since the 2010 Census are presented in Table IV.1. The 2018 estimates indicate that the State of Nebraska’s population increased from 1,826,341 in 2010 to 1,929,268 in 2018, or by 5.6 percent. The 2018 population estimate is not yet available broken down by race, age, or gender. For those purposes, we will use the 2017 five-year ACS estimates. Population trends for State of Nebraska since 2000 are displayed in Diagram IV.1.

Table IV.1	
Population Estimates	
State of Nebraska	
2010-2018 Census Data and Intercensal Estimates	
2010 Census	1,826,341
2011 Population Estimate	1,840,538
2012 Population Estimate	1,853,323
2013 Population Estimate	1,865,414
2014 Population Estimate	1,879,522
2015 Population Estimate	1,891,507
2016 Population Estimate	1,905,924
2017 Population Estimate	1,917,575
2018 Population Estimate	1,929,268

Diagram IV.1
Population
 State of Nebraska



Population Estimates

The Census Bureau’s current estimates indicate that State of Nebraska’s population increased from 1,826,341 in 2010 to 1,929,268 in July, 2018, or by 5.6 percent. This compares to a statewide population change of 5.6 percent over the period. The number of people from 25 to 34 years of age increased by 4.3 percent, and the number of people from 55 to 64 years of age increased by 14.0 percent.

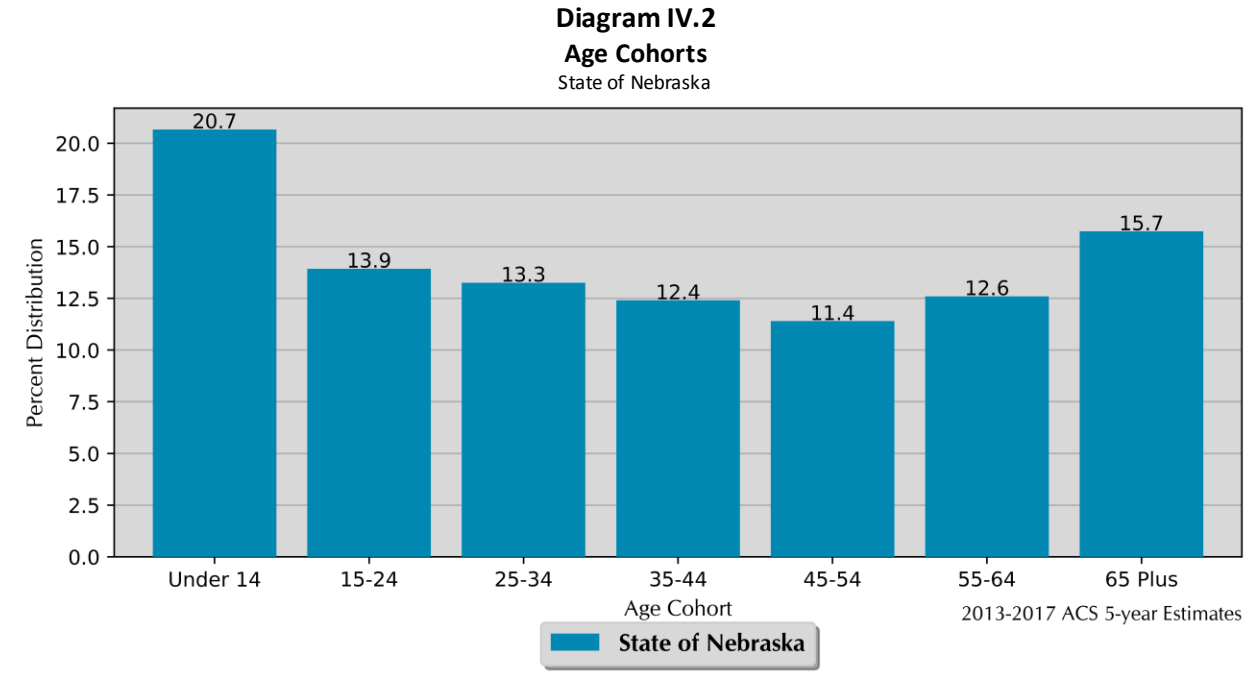
Between 2010 and 2018, the percent change in the State of Nebraska population by race was white with 3.3 percent, black with 14.9 percent, American Indian and Alaskan Natives with 22.4 percent, Asian with 57.1 percent, Native Hawaiian or Pacific Islanders with 13.4 percent, two or more races with 35.3 percent, and Hispanic or Latino with 29.0 percent. These data are presented in Table IV.2.

Table IV.2			
Profile of Population Characteristics			
State of Nebraska			
2010 Census and 2018 Current Census Estimates			
Subject	State of Nebraska		
	2010 Census	Jul-18	% Change
Population	1,826,341	1,929,268	5.6%
Age			
Under 14 years	383,542	398,790	4.0%
15 to 24 years	258,206	268,759	4.1%
25 to 34 years	245,176	255,723	4.3%
35 to 44 years	220,838	239,311	8.4%
45 to 54 years	258,726	219,971	-15.0%
55 to 64 years	213,176	243,048	14.0%
65 and Over	246,677	303,666	23.1%
Race			
White	1,649,264	1,703,446	3.3%
Black	85,971	98,757	14.9%
American Indian and Alaskan Native	23,418	28,663	22.4%
Asian	33,322	52,343	57.1%
Native Hawaiian or Pacific Islander	2,061	2,338	13.4%
Two or more races	32,305	43,721	35.3%
Ethnicity (of any race)			
Hispanic or Latino	167,405	215,872	29.0%

Table IV.3 presents the population of State of Nebraska by age and gender from the 2010 Census and 2018 current census estimates. The 2010 Census count showed a total of 906,296 males, who accounted for 49.6 percent of the population, and the remaining 50.4 percent, or 920,045 persons, were female. In 2018, the number of males rose to 963,382 persons, and accounted for 49.9 percent of the population, with the remaining 50.1 percent, or 965,886 persons being female.

Table IV.3							
Population by Age and Gender							
State of Nebraska							
2010 Census and Current Census Estimates							
Age	2010 Census			2018 Current Census Estimates			% Change 10-18
	Male	Female	Total	Male	Female	Total	
Under 14 years	196,204	187,338	383,542	204,445	194,345	398,790	4.0%
15 to 24 years	132,265	125,941	258,206	137,349	131,410	268,759	4.1%
25 to 44 years	124,976	120,200	245,176	131,965	123,758	255,723	4.3%
45 to 54 years	111,948	108,890	220,838	121,949	117,362	239,311	8.4%
55 to 64 years	129,381	129,345	258,726	111,151	108,820	219,971	-15.0%
65 and Over	105,119	108,057	213,176	119,990	123,058	243,048	14.0%
Total	906,296	920,045	1,826,341	963,382	965,886	1,929,268	5.6%
% of Total	49.6%	50.4%	.	49.9%	50.1%	.	

Diagram IV.2 displays the percentage of the population by age in State of Nebraska.



Census Demographic Data

Census data is presented in one of four Summary Files (SF). In the 1980, 1990, and 2000 decennial censuses, the Census Bureau released the full SF1 100 percent count data, along with additional tabulations including the one-in-six SF3 sample. The Census Bureau did not collect additional sample data such as the SF3 in the 2010 decennial census, so many important housing and income concepts are not available in the 2010 Census.

To study these important housing and income concepts, the Census Bureau distributes the American Community Survey (ACS) every year to a sample of the population, then 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. The five-year estimates are more robust than the one or three year samples because they include more responses and can be tabulated down to the Census tract level.

The Census Bureau collects race data according to U.S. Office of Management and Budget guidelines, and these data are based on self-identification. Ancestry refers to one's ethnic origin or descent, "roots," or heritage, or the place of birth of the person or the person's parents or ancestors before their arrival in the United States. Ethnic identities may or may not represent geographic areas. People may choose to report more than one race group and people of any race may be of any ethnic origin. Hispanic origin can be viewed as the heritage, nationality, lineage, or country of birth of the person or the person's parents or ancestors before arriving in the United States. People who identify as Hispanic, Latino, or Spanish may be any race.

The State of Nebraska population by race and ethnicity is shown in Table IV.4. The white population increased by 6 percent, representing 87.5 percent of the population in 2018, compared with the black population, which increased by 9.6 percent and accounted for 4.8 percent of the population. The

Hispanic population represented 10.7 percent of the population, which increased from 167,405 to 203,281 people between 2010 and 2018, or by 21.4 percent.

Table IV.4				
Population by Race and Ethnicity				
State of Nebraska				
2010 Census & 2018 Five-Year ACS				
Race	2010 Census		2018 Five-Year ACS	
	Population	% of Total	Population	% of Total
White	1,572,838	86.1%	1,666,463	87.5%
Black	82,885	4.5%	90,860	4.8%
American Indian	18,427	1.0%	17,282	0.9%
Asian	32,293	1.8%	44,105	2.3%
Native Hawaiian/ Pacific Islander	1,279	0.1%	1,392	0.1%
Other	79,109	4.3%	36,058	1.9%
Two or More Races	39,510	2.2%	48,600	2.6%
Total	1,826,341	100.0%	1,904,760	100.0%
Non-Hispanic	1,658,936	90.8%	1,701,479	89.3%
Hispanic	167,405	9.2%	203,281	10.7%

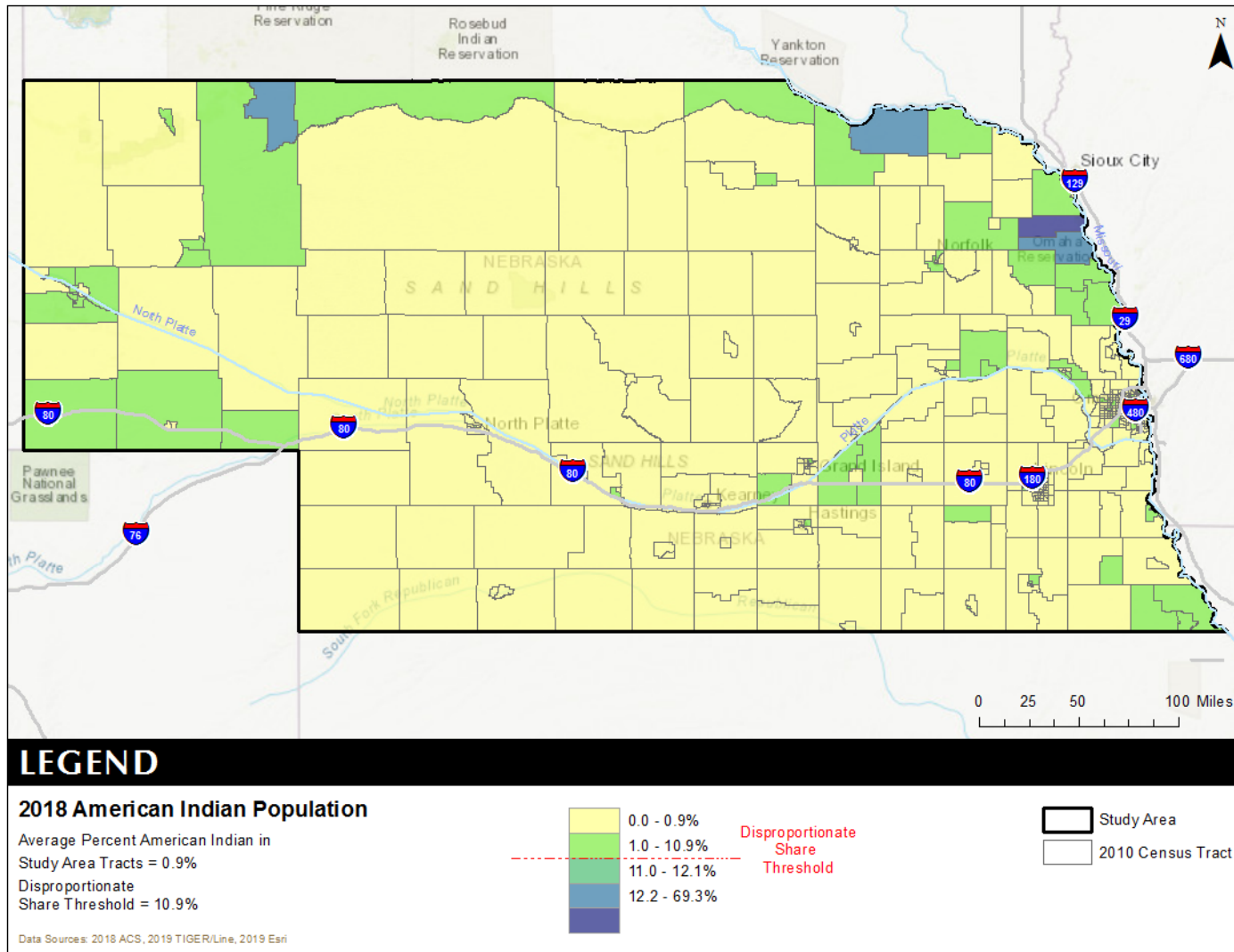
The change in race and ethnicity between 2010 and 2018 is shown in Table IV.5. During this time, the total non-Hispanic population was 1,701,479 persons in 2018. The Hispanic population was 203,281.

Table IV.5				
Population by Race and Ethnicity				
State of Nebraska				
2010 Census & 2018 Five-Year ACS				
Race	2010 Census		2018 Five-Year ACS	
	Population	% of Total	Population	% of Total
Non-Hispanic				
White	1,499,753	90.4%	1,512,314	88.9%
Black	80,959	4.9%	88,442	5.2%
American Indian	14,797	0.9%	13,918	0.8%
Asian	31,919	1.9%	43,839	2.6%
Native Hawaiian/ Pacific Islander	966	0.1%	1,091	0.1%
Other	2,116	0.1%	1,982	0.1%
Two or More Races	28,426	1.7%	39,893	2.3%
Total Non-Hispanic	1,658,936	100.0%	1,701,479	100.0%
Hispanic				
White	73,085	43.7%	154,149	75.8%
Black	1,926	1.2%	2,418	1.2%
American Indian	3,630	2.2%	3,364	1.7%
Asian	374	0.2%	266	0.1%
Native Hawaiian/ Pacific Islander	313	0.2%	301	0.1%
Other	76,993	46.0%	34,076	16.8%
Two or More Races	11,084	6.6%	8,707	4.3%
Total Hispanic	167,405	100.0	203,281	100.0%
Total Population	1,826,341	100.0%	1,904,760	100.0%

The maps on the following page show the geographic distribution of American Indian and Hispanic households. These two racial and ethnic groups have a disproportionate share in certain areas in the State. A disproportionate share exists when any racial or ethnic group is concentrated in an area at a rate at least ten percentage points higher than the jurisdiction average. The state saw a disproportionate share of American Indian households in the northern part of the State. The highest concentrations of Hispanic households were seen in western and central Nebraska.

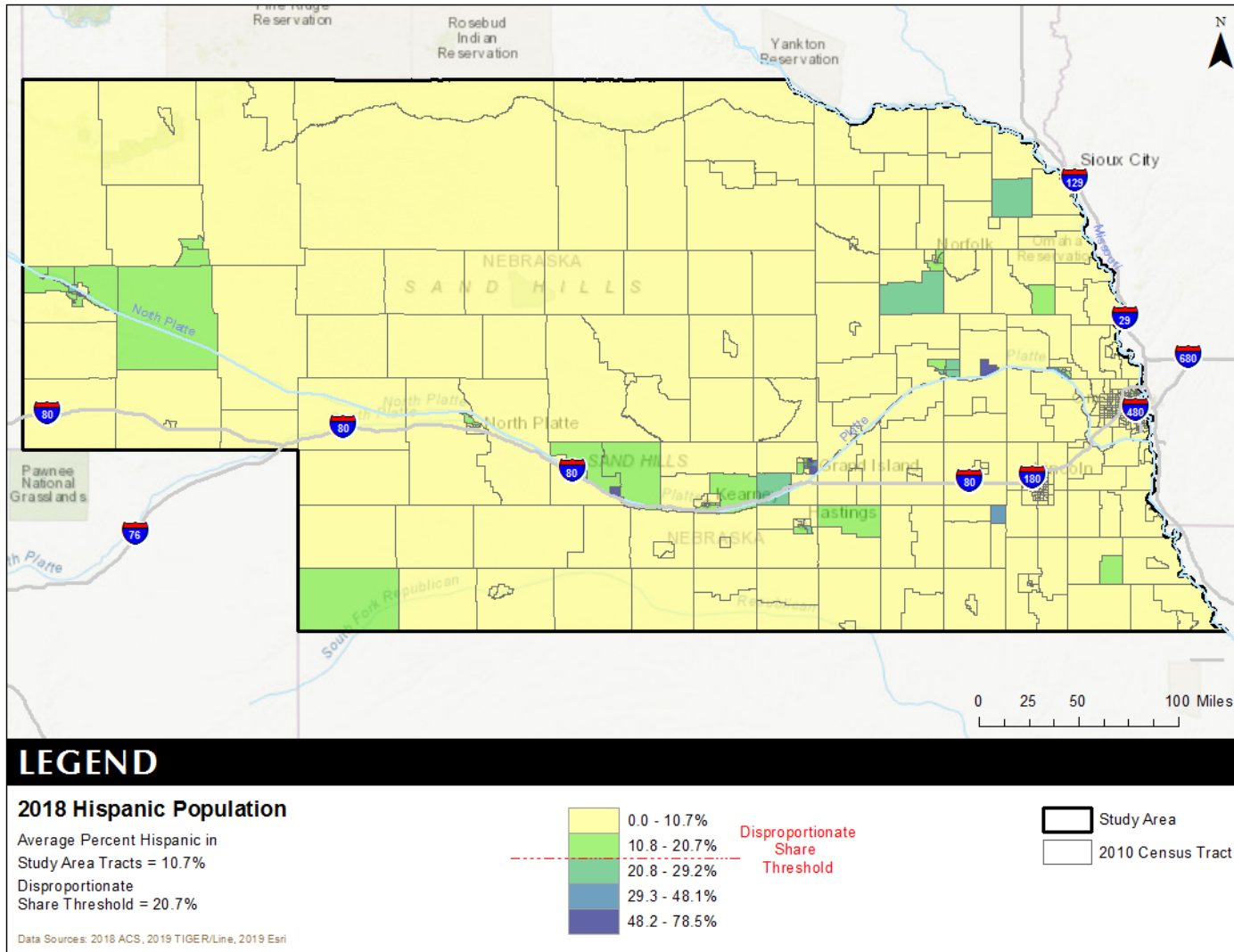
Map IV.1 American Indian Population

State of Nebraska
2018 ACS, Tigerline



Map IV.2 Hispanic Population

State of Nebraska
2018 ACS, Tigerline



Group Quarters Population

The group quarters population includes the institutionalized population, who live in correctional institutions, juvenile facilities, nursing homes, and other institutions, and the non-institutionalized population, who live in college dormitories, military quarters, and other group living situations. As seen in Table IV.6, between 2000 and 2010, the institutionalized population changed -9.1 percent in State of Nebraska, from 26,011 people in 2000 to 23,633 in 2010. The non-institutionalized population changed 11.0%, from 24,807 in 2000 to 27,532 in 2010.

Group Quarters Type	2000 Census		2010 Census		% Change 00-10
	Population	% of Total	Population	% of Total	
Institutionalized					
Correctional Institutions	6,060	23.3%	8,084	34.2%	33.4%
Juvenile Facilities	.	.	1,673	7.1%	.
Nursing Homes	16,195	62.3%	13,519	57.2%	-16.5%
Other Institutions	3,756	14.4%	357	1.5%	-90.5%
Total	26,011	100.0%	23,633	100.0%	-9.1%
Non-institutionalized					
College Dormitories	18,376	74.1%	22,073	80.2%	20.1%
Military Quarters	590	2.4%	443	1.6%	-24.9%
Other Non-institutionalized	5,841	23.5%	5,016	18.2%	-14.1%
Total	24,807	100.0%	27,532	100.0%	11.0%
Group Quarters Population	50,818	100.0%	51,165	100.0%	0.7%

Foreign Born and Limited English Proficiency Populations

Under Title VI of the Civil Rights Act of 1964 and in accordance with Supreme Court precedent in *Lau v. Nichols*, recipients of federal financial assistance are required to take reasonable steps to ensure meaningful access to their programs and activities by limited English proficient (LEP) persons.⁸ In the context of HUD's assessment of access to housing, LEP refers to a person's limited ability to read, write, speak, or understand English.⁹

The number of foreign born persons are shown in Table IV.7. An estimated 2.5 percent of the population was born in Mexico, some 0.5 percent were born in Guatemala, and another 0.3 percent were born in India.

⁸ https://www.hud.gov/program_offices/fair_housing_equal_opp/limited_english_proficiency_0

⁹ <https://www.hud.gov/sites/documents/LEPMEMO091516.PDF>

Number	County	Number of Person	Percent of Total Population
#1 country of origin	Mexico	47,642	2.5%
#2 country of origin	Guatemala	8,901	0.5%
#3 country of origin	India	6,496	0.3%
#4 country of origin	Vietnam	5,875	0.3%
#5 country of origin	El Salvador	4,725	0.2%
#6 country of origin	China excluding Hong Kong and Taiwan	4,196	0.2%
#7 country of origin	Burma	3,950	0.2%
#8 country of origin	Cuba	3,413	0.2%
#9 country of origin	Philippines	2,400	0.1%
#10 country of origin	Korea	2,394	0.1%

The language spoken at home for those with Limited English Proficiency are shown in Table IV.8. An estimated 3.4 percent or 59,587 people of the population speaks Spanish at home, followed by 0.4 percent or 7,523 people speaking Other Asian and Pacific Island languages.

Number	County	Number of Person	Percent of Total Population
#1 LEP Language	Spanish	59,587	3.4%
#2 LEP Language	Other Asian and Pacific Island languages	7,523	0.4%
#3 LEP Language	Vietnamese	4,605	0.3%
#4 LEP Language	Other Indo-European languages	4,154	0.2%
#5 LEP Language	Other and unspecified languages	3,967	0.2%
#6 LEP Language	Chinese	2,869	0.2%
#7 LEP Language	Arabic	2,126	0.1%
#8 LEP Language	Russian, Polish, or other Slavic languages	1,413	0.1%
#9 LEP Language	French, Haitian, or Cajun	913	0.1%
#10 LEP Language	Korean	838	0.0%

Education and Employment

Education and employment data from the State of Nebraska 2018 Five-Year ACS is presented in Table IV.9, Table IV.10, and Table IV.11. In 2018, 1,030,381 people were in the labor force, including 993,836 employed and 36,545 unemployed people. The unemployment rate for the State of Nebraska was estimated at 3.5 percent in 2018.

Table IV.9	
Employment, Labor Force and Unemployment	
State of Nebraska	
2018 Five-Year ACS Data	
Employment Status	2018 Five-Year ACS
Employed	993,836
Unemployed	36,545
Labor Force	1,030,381
Unemployment Rate	3.5%

Table IV.10 and Table IV.11 show educational attainment in the State of Nebraska. In 2018, 90.9 percent of the adult population had a high school education or greater, including 26.6 percent with a high school diploma or equivalent, 35.6 percent with some college, 19.5 percent with a Bachelor's Degree, and 9.2 percent with a graduate or professional degree.

Table IV.11	
High School or Greater Education	
State of Nebraska	
2018 Five-Year ACS Data	
Education Level	Households
High School or Greater	696,929
Total Households	754,063
Percent High School or Above	92.4%

Table IV.11		
Educational Attainment		
State of Nebraska		
2018 Five-Year ACS Data		
Education Level	2018 5-year ACS	Percent
Less Than High School	130,342	9.1%
High School or Equivalent	380,598	26.6%
Some College or Associates Degree	509,462	35.6%
Bachelor's Degree	279,835	19.5%
Graduate or Professional Degree	132,005	9.2%
Total Population Above 18 years	1,432,242	100.0%

Commuting Patterns

Table IV.12 shows the place of work by county of residence. In 2010, 78.9 percent of residents worked within the county they reside with 18.2 percent working outside their home county. This compares to 78.1 percent of residents in 2018 who worked within the county in which they reside, and 19.1 percent of residents worked outside their home county but still within the state.

Table IV.12				
Place of Work				
State of Nebraska				
2010 and 2018 5 year ACS data				
Place of work	2010 5-year ACS	% of Total	2018 5-year ACS	% of Total
Worked in county of residence	728,921	78.9%	766,483	78.1%
Worked outside county of residence	167,655	18.2%	187,537	19.1%
Worked outside state of residence	26,880	2.9%	26,894	2.7%
Total	923,456	100.0%	980,914	100.0%

Table IV.13 shows the aggregate travel time to work based on place of work and residence. In the State of Nebraska the total aggregate travel time was 17,405,100 minutes, with residents working in their home county spending a total of 10,956,910 minutes traveling.

Table IV.13				
Aggregate Travel Time to Work (in Minutes)				
State of Nebraska				
2010 & 2018 5 year ACS data				
Place of Work	2010 5-year ACS	% of Total	2018 5-year ACS	% of Total
Worked in county of residence	9,809,540	62.5%	10,956,910	63.0%
Worked outside county of residence	5,019,925	32.0%	5,592,255	32.1%
Worked outside state of residence	873,525	5.6%	855,935	4.9%
Aggregate travel time to work (in minutes):	15,702,990	100.0%	17,405,100	100.0%

Table IV.14 shows the average travel time to work based on place of work and residence. In 2018 the overall aggregate travel time was 15,702,990 minutes. Residents working within their home county spent an average of 14.3 minutes commuting to work, with those working outside their county of residence spending an average of 29.8 minutes on their commute.

Table IV.14		
Average Travel Time to Work (in Minutes)		
State of Nebraska		
2010 & 2018 5 year ACS data		
Place of Work	2010 5-year ACS	2018 5-year ACS
Worked in county of residence	13.5	14.3
Worked outside county of residence	29.9	29.8
Worked outside state of residence	32.5	31.8
Average travel time to work (in minutes):	17.0	17.7

Table IV.15 shows the means of transportation to work. In 2018, 81.9 percent of commuters drove alone in a car, truck, or van. Only 9.0 percent carpooled, with an additional 0.7 percent taking public transportation. Also, there were 43,544 persons or 4.4 percent who worked from home.

Table IV.15				
Means of Transportation to Work				
State of Nebraska				
2010 & 2018 5 year ACS data				
Means	2010 5-year ACS	% of Total	2018 5-year ACS	% of Total
Car, truck, or van: Drove alone	738,299	79.9%	803,715	81.9%
Car, truck, or van: Carpooled:	92,673	10.0%	88,467	9.0%
Public transportation (excluding taxicab):	6,086	0.7%	6,531	0.7%
Taxicab	393	0%	641	0.1%
Motorcycle	1,947	0.2%	1,142	0.1%
Bicycle	4,256	0.5%	4,198	0.4%
Walked	29,462	3.2%	26,141	2.7%
Other means	5,358	0.6%	6,535	0.7%
Worked at home	44,982	4.9%	43,544	4.4%
Total	923,456	100.0%	980,914	100.0%

Table IV.16 shows the breakdown of the means of transportation by tenure. In 2018, 58.7 percent of commuters owned their home and commuted alone by car, which compares to 60.5 percent in 2010. There were also 230,285 renters who drove alone in 2018 and accounted for 23.8 percent of the total commuter population. Commuters who owned their own home and took public transportation represented 0.2 percent of the population, which compares to 3,791 renters, or 0.4 percent taking public transportation.

Table IV.16				
Means Of Transportation To Work By Tenure				
State of Nebraska				
2010 & 2018 5 year ACS data				
Tenure	2010 5-year ACS	% of Total	2018 5-year ACS	% of Total
Car, truck, or van - drove alone:				
Owner	551,461	60.5%	568,664	58.7%
Renter	181,494	19.9%	230,285	23.8%
Car, truck, or van - carpooled:				
Owner	60,423	6.6%	55,284	5.7%
Renter	31,318	3.4%	32,595	3.4%
Public transportation (excluding taxicab):				
Owner	1,854	0.2%	2,329	0.2%
Renter	3,905	0.4%	3,791	0.4%
Walked:				
Owner	13,461	1.5%	10,558	1.1%
Renter	12,056	1.3%	11,374	1.2%
Taxicab, motorcycle, bicycle, or other means:				
Owner	7,113	0.8%	6,874	0.7%
Renter	4,691	0.5%	5,292	0.5%
Worked at home:				
Owner	35,776	3.9%	34,089	3.5%
Renter	7,855	0.9%	8,285	0.9%
Total:	911,407	100.0%	969,420	100.0%

Summary

While the population in Nebraska is growing, the racial and ethnic makeup of the area is not changing significantly. There are areas in the State, however, that do see high concentrations of Native American and Hispanic residents. The population is also aging, with those aged 65 and older growing at the fastest rate in the State. Limited English Proficiency includes a 3.4 percent, or 59,587 people of the population speaks Spanish at home, followed by 0.4 percent or 7,523 people speaking Other Asian and Pacific Island languages. In 2018, some 90.9 percent of households had a high school education or greater, including 26.6 percent with a high school diploma or equivalent, 35.6 percent with some college, 19.5 percent with a Bachelor's Degree, and 9.2 percent with a graduate or professional degree.

Economics

The following section describes the economic context for the State of Nebraska. The data presented here is from the Bureau of Economic Analysis (BEA) and the Bureau of Labor Statistics (BLS).

Labor Force

Table IV.17 shows labor force statistics for the State of Nebraska between 1990 and 2018. The unemployment rate in the State of Nebraska was 2.8 percent in 2018, with 28,509 unemployed persons and 1,020,197 in the labor force. In 2017, 982,442 people were employed, 29,184 were unemployed, and the labor force totaled 1,011,626 people.

Table IV.17 Labor Force Statistics State of Nebraska 1990 - 2018 BLS Data					
Year	State of Nebraska			Unemployment Rate	Statewide Unemployment Rate
	Unemployment	Employment	Labor Force		
1990	19,316	805,708	825,024	2.3%	2.3%
1991	22,274	814,020	836,294	2.7%	2.7%
1992	24,225	823,384	847,609	2.9%	2.9%
1993	23,819	840,575	864,394	2.8%	2.8%
1994	23,455	862,936	886,391	2.6%	2.6%
1995	23,897	878,414	902,311	2.6%	2.6%
1996	24,941	889,438	914,379	2.7%	2.7%
1997	23,002	898,310	921,312	2.5%	2.5%
1998	23,750	907,202	930,952	2.6%	2.6%
1999	26,115	911,444	937,559	2.8%	2.8%
2000	26,603	918,370	944,973	2.8%	2.8%
2001	29,761	921,003	950,764	3.1%	3.1%
2002	34,823	919,401	954,224	3.6%	3.6%
2003	37,943	926,315	964,258	3.9%	3.9%
2004	37,466	932,515	969,981	3.9%	3.9%
2005	37,086	935,906	972,992	3.8%	3.8%
2006	30,178	939,874	970,052	3.1%	3.1%
2007	29,269	949,494	978,763	3.0%	3.0%
2008	32,998	956,759	989,757	3.3%	3.3%
2009	45,935	945,648	991,583	4.6%	4.6%
2010	46,038	947,360	993,398	4.6%	4.6%
2011	44,197	959,059	1,003,256	4.4%	4.4%
2012	40,552	974,428	1,014,980	4.0%	4.0%
2013	38,357	979,937	1,018,294	3.8%	3.8%
2014	33,201	977,617	1,010,818	3.3%	3.3%
2015	30,261	976,997	1,007,258	3.0%	3.0%
2016	30,910	978,533	1,009,443	3.1%	3.1%
2017	29,184	982,442	1,011,626	2.9%	2.9%
2018	28,509	991,688	1,020,197	2.8%	2.8%

Diagram IV.3 shows the employment and labor force for the State of Nebraska. The difference between the two lines represents the number of unemployed persons. In 2018, employment stood at 991,688 persons, with the labor force reaching 1,020,197, indicating there were a total of 28,509 unemployed persons

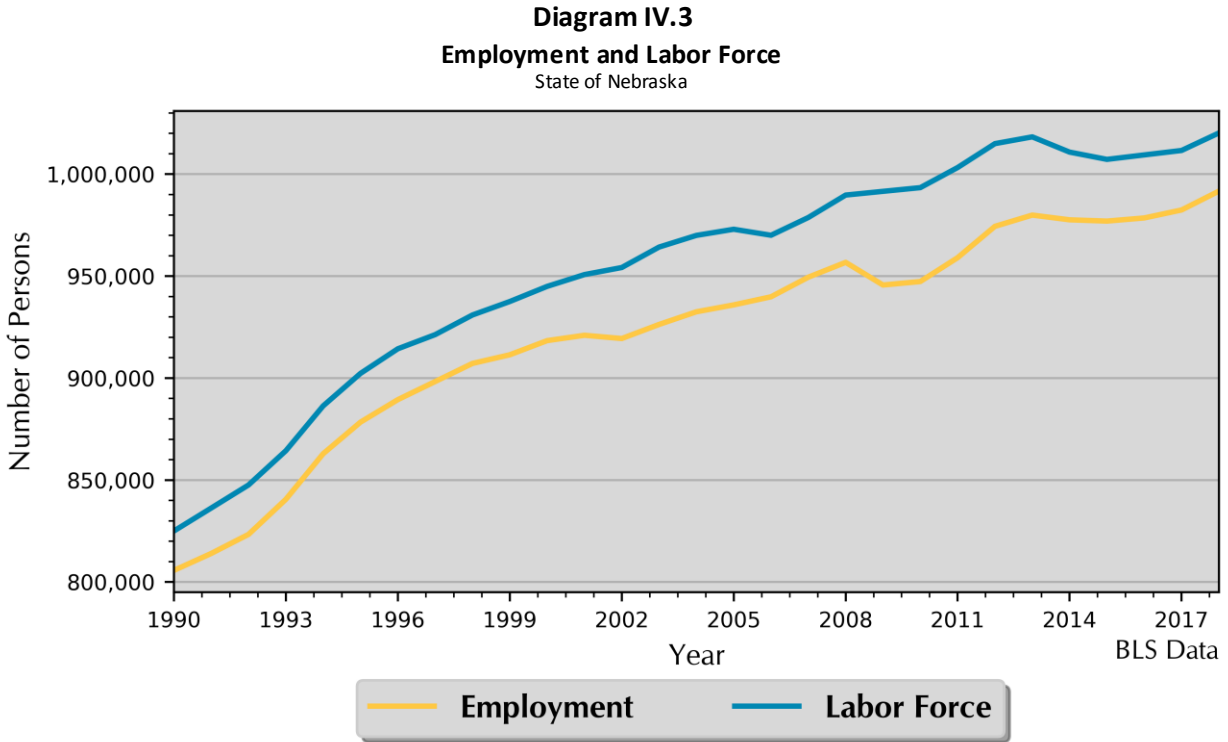
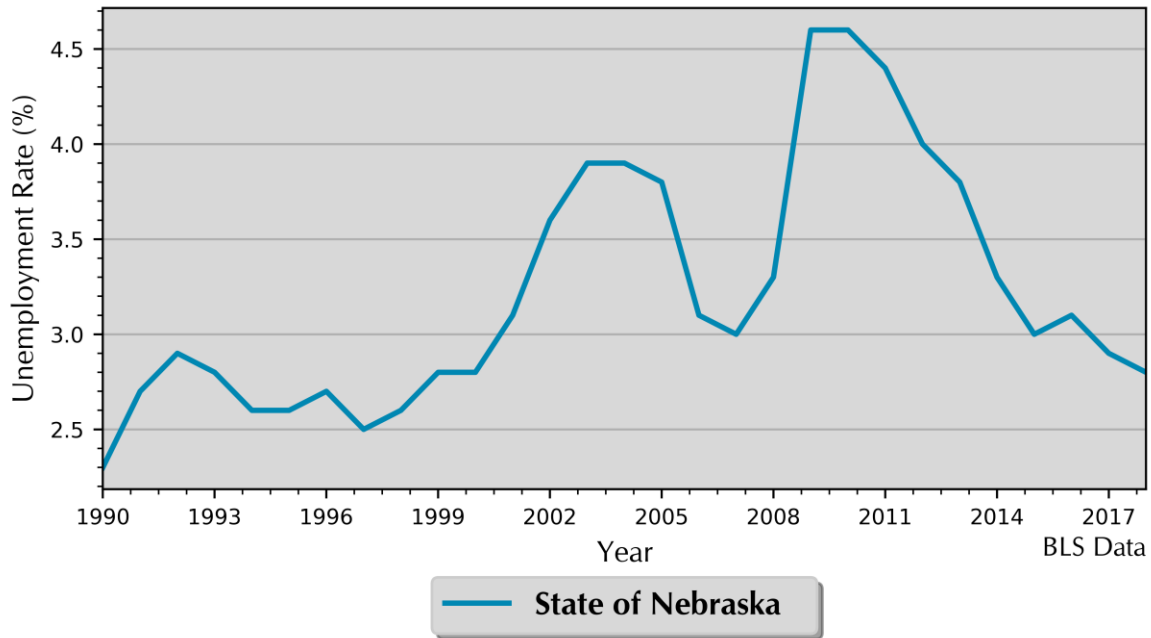


Diagram IV.4 shows the unemployment rate for the State of Nebraska. During the 1990’s the average rate for State of Nebraska was 2.6 percent. Between 2000 and 2010 the unemployment rate had an average of 3.5 percent. Over the course of the entire period the State of Nebraska had an average unemployment rate was equal to the 3.2 percent.

Diagram IV.4
Annual Unemployment Rate
 State of Nebraska
 1990 – 2018 BLS Data



Earnings and Employment

The Bureau of Economic Analysis (BEA) produces regional economic accounts, which provide a consistent framework for analyzing and comparing individual state and local area economies. Table IV.18 shows total real earnings by industry for the State of Nebraska. In 2017, the government and government enterprises industry had the largest total real earnings of \$11,989,094,000. Between 2016 and 2017, the mining industry saw the largest percentage increase of 64.9 percent, to \$115,417,000.

Table IV.18
Real Earnings by Industry
 State of Nebraska
 BEA Table CA-5N Data (1,000's of 2017 Dollars)

NAICS Categories	2010	2011	2012	2013	2014	2015	2016	2017	% Change 16-17
Farm earnings	3,577,632	7,200,396	5,035,904	7,318,690	6,119,089	5,485,761	4,050,125	3,597,379	-11.2
Forestry, fishing, related activities, and other	281,958	288,140	335,675	331,793	333,603	335,705	341,211	334,356	-2.0
Mining	74,379	84,965	142,702	118,629	124,271	87,935	70,003	115,417	64.9
Utilities	1,185,226	1,565,440	1,746,325	696,231	628,664	907,382	1,130,812	1,279,551	13.2
Construction	4,951,500	5,144,327	5,234,292	4,922,132	4,708,297	4,657,612	4,275,945	4,124,372	-3.5
Manufacturing	5,920,136	6,101,705	6,220,170	6,360,545	6,990,207	7,293,032	6,561,333	6,780,959	3.3
Wholesale trade	3,418,173	3,390,807	3,553,947	3,572,018	3,884,883	3,910,731	3,763,222	3,574,590	-5.0
Retail trade	3,749,307	3,722,760	3,883,261	4,059,407	3,995,111	4,105,233	4,102,142	4,148,535	1.1
Transportation and warehousing	4,104,025	5,961,285	5,476,416	5,293,560	7,300,605	7,235,670	6,203,869	6,444,795	3.9
Information	1,291,720	1,344,144	1,371,623	1,383,112	1,400,388	1,438,513	1,522,727	1,493,917	-1.9
Finance and insurance	4,663,844	4,465,257	4,741,175	4,525,264	4,714,221	4,965,555	5,214,044	5,452,121	4.6
Real estate and rental and leasing	595,902	630,636	832,390	1,018,177	1,084,469	1,129,999	1,198,712	1,201,197	0.2
Professional and technical services	4,020,309	4,070,045	4,355,318	4,139,644	4,195,867	4,288,172	4,320,370	4,503,720	4.2
Management of companies and enterprises	1,843,789	1,802,215	1,988,260	2,324,454	2,427,439	2,678,219	2,527,737	2,540,290	0.5
Administrative and waste services	1,856,551	1,937,693	2,079,924	2,189,940	2,369,193	2,478,479	2,583,543	2,674,936	3.5
Educational services	818,841	816,553	849,133	799,005	801,582	804,314	843,079	817,977	-3.0
Health care and social assistance	7,018,263	7,063,260	7,372,434	7,412,617	7,461,575	7,673,317	7,990,829	8,106,710	1.5
Arts, entertainment, and recreation	337,434	346,607	378,766	397,314	434,333	418,951	451,578	476,106	5.4
Accommodation and food services	1,379,838	1,423,030	1,522,391	1,544,634	1,634,296	1,709,334	1,788,897	1,791,102	0.1
Other services, except public administration	2,242,987	2,218,830	2,326,773	2,304,159	2,383,466	2,418,876	2,422,362	2,431,812	0.4
Government and government enterprises	11,464,568	11,437,458	11,285,918	11,164,374	11,346,266	11,747,773	11,922,966	11,989,094	0.6
Total	64,796,383	71,015,552	70,732,797	71,875,700	74,337,824	75,770,564	73,285,504	73,878,938	0.8

Table IV.19 shows the total employment by industry for the State of Nebraska. The most recent estimates show the government and government enterprises industry was the largest employer in the State of Nebraska, with employment reaching 175,814 jobs in 2017. Between 2016 and 2017 the utilities industry saw the largest percentage increase, rising by 16.5 percent to 1,651 jobs.

NAICS Categories	2010	2011	2012	2013	2014	2015	2016	2017	% Change 16-17
Farm earnings	54,213	55,431	53,922	54,160	53,653	57,292	55,387	55,464	0.1
Forestry, fishing, related activities, and other	10,006	10,520	10,695	11,219	11,744	10,371	10,906	10,613	-2.7
Mining	2,837	2,543	3,560	3,647	3,673	3,658	3,633	3,851	6.0
Utilities	1,835	1,769	1,756	1,456	1,428	1,309	1,417	1,651	16.5
Construction	63,759	62,463	64,957	67,423	69,843	71,902	74,749	75,901	1.5
Manufacturing	94,486	96,880	98,338	100,060	100,842	100,872	100,647	102,145	1.5
Wholesale trade	43,166	43,782	44,131	44,769	47,198	46,886	44,653	43,764	-2.0
Retail trade	128,618	129,838	130,339	131,244	133,514	136,219	136,161	134,936	-0.9
Transportation and warehousing	59,573	60,855	62,025	62,193	62,762	65,227	62,804	62,725	-0.1
Information	19,120	19,418	19,411	19,540	19,633	20,018	21,037	20,724	-1.5
Finance and insurance	77,426	80,341	79,563	80,096	79,175	80,240	83,387	85,447	2.5
Real estate and rental and leasing	39,274	41,325	41,216	42,873	44,723	46,316	47,709	49,034	2.8
Professional and technical services	60,709	60,813	62,518	62,080	62,279	63,714	62,761	63,999	2.0
Management of companies and enterprises	17,742	17,231	17,338	19,996	21,173	22,903	22,574	22,806	1.0
Administrative and waste services	56,497	57,255	59,392	60,947	63,069	63,686	65,935	64,797	-1.7
Educational services	23,183	22,807	22,814	22,936	23,369	23,942	23,743	23,859	0.5
Health care and social assistance	130,499	131,896	139,450	139,909	140,259	140,977	143,639	144,418	0.5
Arts, entertainment, and recreation	21,776	22,047	22,760	23,311	24,006	23,888	24,529	25,151	2.5
Accommodation and food services	73,883	75,345	76,802	78,168	79,215	79,950	82,077	83,088	1.2
Other services, except public administration	64,058	65,432	66,784	67,140	67,545	69,447	68,534	69,027	0.7
Government and government enterprises	177,142	174,466	173,487	173,310	173,992	174,600	175,632	175,814	0.1
Total	1,219,802	1,232,457	1,251,258	1,266,477	1,283,095	1,303,417	1,311,914	1,319,214	0.6

Table IV.20 shows the real average earnings per job by industry for the State of Nebraska. These figures are calculated by dividing the total real earning displayed in Tables IV.1.18 and IV.1.19, by industry. In 2017, the utilities industry had the highest average earnings reaching 775,016 dollars. Between 2016 and 2017 the mining industry saw the largest percentage increase, rising by 55.5 percent to 29,971 dollars.

Table IV.20									
Real Earnings Per Job by Industry									
State of Nebraska									
BEA Table CA5N and CA25 Data									
NAICS Categories	2010	2011	2012	2013	2014	2015	2016	2017	% Change 16-17
Farm earnings	65,992	129,898	93,392	135,131	114,049	95,751	73,124	64,860	-11.3
Forestry, fishing, related activities, and other	28,179	27,390	31,386	29,574	28,406	32,370	31,287	31,504	0.7
Mining	26,218	33,411	40,085	32,528	33,834	24,039	19,269	29,971	55.5
Utilities	645,900	884,930	994,490	478,181	440,241	693,187	798,032	775,016	-2.9
Construction	77,660	82,358	80,581	73,004	67,413	64,777	57,204	54,339	-5.0
Manufacturing	62,656	62,982	63,253	63,567	69,318	72,300	65,192	66,386	1.8
Wholesale trade	79,187	77,448	80,532	79,788	82,310	83,409	84,277	81,679	-3.1
Retail trade	29,151	28,672	29,794	30,930	29,923	30,137	30,127	30,744	2.0
Transportation and warehousing	68,891	97,959	88,294	85,115	116,322	110,931	98,781	102,747	4.0
Information	67,559	69,222	70,662	70,784	71,328	71,861	72,383	72,086	-0.4
Finance and insurance	60,236	55,579	59,590	56,498	59,542	61,884	62,528	63,807	2.0
Real estate and rental and leasing	15,173	15,260	20,196	23,749	24,249	24,398	25,125	24,497	-2.5
Professional and technical services	66,223	66,927	69,665	66,682	67,372	67,303	68,838	70,372	2.2
Management of companies and enterprises	103,922	104,591	114,676	116,246	114,648	116,937	111,976	111,387	-0.5
Administrative and waste services	32,861	33,843	35,020	35,932	37,565	38,917	39,183	41,282	5.4
Educational services	35,321	35,803	37,220	34,836	34,301	33,594	35,509	34,284	-3.4
Health care and social assistance	53,780	53,552	52,868	52,982	53,199	54,430	55,631	56,134	0.9
Arts, entertainment, and recreation	15,496	15,721	16,642	17,044	18,093	17,538	18,410	18,930	2.8
Accommodation and food services	18,676	18,887	19,822	19,760	20,631	21,380	21,795	21,557	-1.1
Other services, except public administration	35,015	33,910	34,840	34,319	35,287	34,831	35,345	35,230	-0.3
Government and government enterprises	64,720	65,557	65,053	64,419	65,211	67,284	67,886	68,192	0.5
Total	53,120	57,621	56,529	56,752	57,936	58,132	55,862	56,002	0.3

Table IV.21 shows total employment and real personal income for the years of 1969 to 2017. Total real personal income includes all wage and salary earnings, proprietorship income, dividends, interest, rents, and transfer payments. In 2017, total real personal income was \$99,761,271,000, a 1.1 percent change between 2016 and 2017. Total employment was 1,219,802 in 2010 and 1,319,214 in 2017, a change of 0.6 percent over the period.

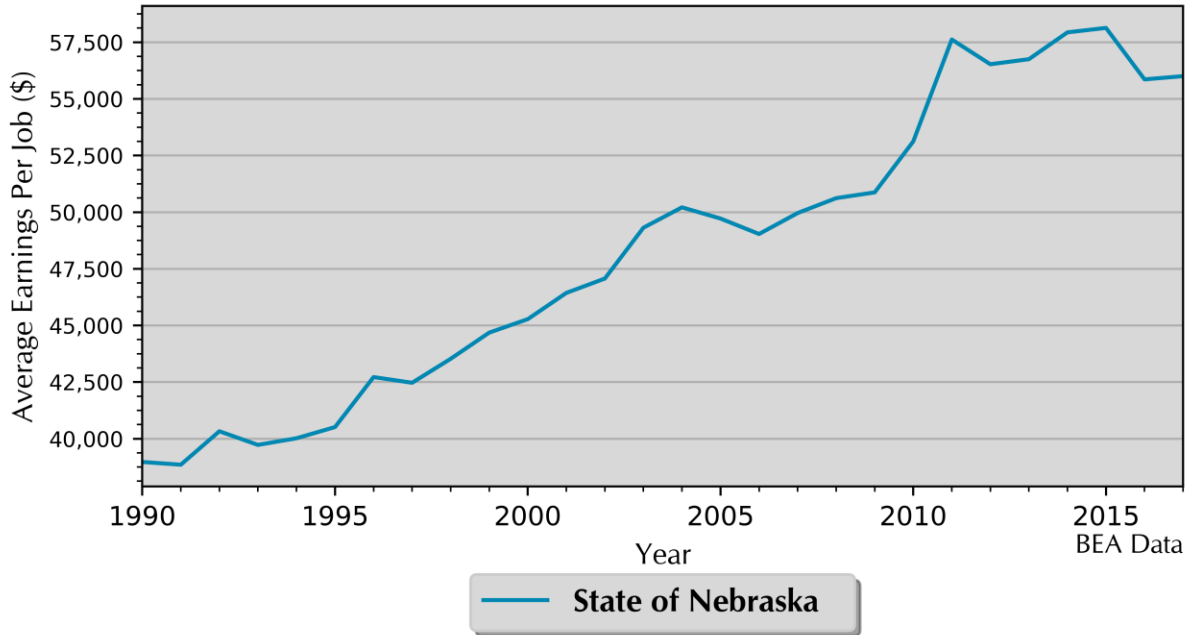
Table IV.21
Total Employment and Real Personal Income

State of Nebraska
 BEA Data 1969 Through 2017

Year	1,000s of 2017 Dollars						Per Capita Income	Total Employment	Average Real Earnings Per Job
	Earnings	Social Security Contributions	Residents Adjustments	Dividends, Interest, Rents	Transfer Payments	Personal Income			
1969	23,792,000	1,441,791	-544,933	4,807,464	2,301,721	28,914,461	19,614	703,747	33,807
1970	23,912,755	1,470,993	-557,632	5,165,911	2,533,381	29,583,422	19,883	715,204	33,437
1971	25,013,388	1,553,616	-548,745	5,288,148	2,725,919	30,925,095	20,557	728,277	34,348
1972	26,555,806	1,691,556	-564,148	5,632,689	2,877,431	32,810,223	21,612	747,678	35,518
1973	29,512,545	2,059,436	-548,736	6,088,983	3,262,858	36,256,213	23,721	774,584	38,102
1974	27,624,190	2,186,784	-537,131	6,347,390	3,421,564	34,669,228	22,545	793,125	34,828
1975	28,547,245	2,143,850	-524,815	6,565,743	3,832,785	36,277,108	23,536	789,876	36,143
1976	28,258,433	2,319,383	-522,212	6,621,048	3,874,416	35,912,303	23,186	811,421	34,826
1977	28,641,162	2,384,304	-488,762	6,987,426	3,883,112	36,638,634	23,571	831,023	34,465
1978	31,428,289	2,562,451	-525,868	7,238,514	4,023,043	39,601,526	25,372	854,384	36,784
1979	31,112,899	2,751,825	-564,388	7,497,503	4,137,919	39,432,107	25,208	875,515	35,535
1980	29,059,321	2,726,997	-559,538	8,337,397	4,431,838	38,542,021	24,514	876,861	33,141
1981	30,314,766	2,864,740	-606,772	9,349,523	4,665,532	40,858,309	25,885	871,447	34,788
1982	29,454,332	2,873,590	-588,883	10,586,435	4,840,371	41,418,663	26,185	860,736	34,219
1983	29,219,812	2,921,157	-596,130	10,583,533	5,039,526	41,325,585	26,084	867,419	33,686
1984	31,991,029	3,171,448	-659,046	11,029,597	5,100,716	44,290,847	27,880	885,647	36,121
1985	33,070,154	3,328,188	-691,479	10,937,597	5,251,568	45,239,652	28,548	897,918	36,831
1986	33,558,828	3,501,553	-682,146	10,911,247	5,383,353	45,669,730	29,009	897,767	37,381
1987	34,937,173	3,612,092	-664,501	10,550,855	5,372,492	46,583,928	29,737	924,608	37,786
1988	36,573,811	3,898,774	-709,293	10,687,060	5,413,148	48,065,951	30,587	947,439	38,604
1989	36,973,511	4,011,869	-704,455	11,176,827	5,610,041	49,044,056	31,142	964,656	38,327
1990	38,505,352	4,275,938	-677,906	11,232,292	5,865,203	50,649,003	32,023	988,048	38,972
1991	38,554,811	4,369,928	-715,854	11,286,077	6,103,961	50,859,068	31,868	992,320	38,853
1992	40,295,145	4,484,770	-772,043	11,368,306	6,479,462	52,886,101	32,814	999,204	40,328
1993	40,560,335	4,612,314	-779,076	11,421,619	6,757,684	53,348,248	32,817	1,020,980	39,726
1994	42,478,194	4,839,269	-786,972	11,757,022	6,902,023	55,510,997	33,869	1,061,466	40,019
1995	43,398,395	4,969,201	-840,828	12,684,316	7,200,244	57,472,926	34,684	1,071,231	40,513
1996	46,850,446	5,150,548	-903,365	13,147,855	7,522,602	61,466,991	36,724	1,096,704	42,719
1997	47,198,028	5,392,562	-1,003,293	13,715,128	7,667,147	62,184,447	36,874	1,111,371	42,469
1998	49,572,864	5,649,745	-1,047,342	14,677,224	8,080,589	65,633,591	38,704	1,138,917	43,526
1999	51,645,251	5,866,115	-1,155,641	14,587,017	8,420,876	67,631,387	39,672	1,155,804	44,683
2000	53,114,823	5,993,583	-1,226,454	15,468,043	8,638,706	70,001,535	40,845	1,173,123	45,276
2001	54,566,153	6,103,516	-1,210,051	15,466,189	9,296,045	72,014,819	41,873	1,175,112	46,435
2002	54,883,061	6,229,040	-1,228,904	15,002,784	9,731,706	72,159,608	41,751	1,165,989	47,069
2003	57,656,863	6,340,365	-1,253,980	15,192,778	9,966,200	75,221,496	43,265	1,169,200	49,313
2004	59,259,431	6,453,325	-1,229,029	14,576,205	10,167,525	76,320,807	43,627	1,180,180	50,212
2005	59,272,684	6,591,615	-1,188,102	14,714,997	10,439,457	76,647,422	43,513	1,192,178	49,718
2006	59,235,280	6,884,088	-1,049,467	15,669,462	10,948,853	77,920,040	43,955	1,208,025	49,035
2007	61,497,772	6,978,101	-1,130,600	17,190,175	11,243,456	81,822,702	45,879	1,230,935	49,961
2008	62,632,827	7,075,347	-1,146,661	17,955,309	12,387,890	84,754,019	47,181	1,237,365	50,618
2009	62,225,491	7,035,450	-1,111,733	15,802,607	12,842,067	82,722,981	45,636	1,223,177	50,873
2010	64,796,383	7,199,398	-1,031,577	15,696,994	13,630,853	85,893,256	46,937	1,219,802	53,120
2011	71,015,552	6,449,245	-1,083,595	16,820,161	13,603,890	93,906,762	50,991	1,232,457	57,621
2012	70,732,797	6,511,339	-1,102,230	18,494,657	13,449,394	95,063,280	51,251	1,251,258	56,529
2013	71,875,700	7,334,271	-1,051,073	17,165,784	13,380,207	94,036,347	50,357	1,266,477	56,752
2014	74,337,824	7,557,539	-997,512	18,343,344	13,653,676	97,779,793	51,986	1,283,095	57,937
2015	75,770,564	7,783,458	-1,061,361	19,449,476	14,177,257	100,552,478	53,102	1,303,417	58,132
2016	73,285,504	7,825,165	-1,106,692	19,765,337	14,589,763	98,708,748	51,745	1,311,914	55,861
2017	73,878,938	8,043,215	-1,170,615	20,217,687	14,878,476	99,761,271	51,957	1,319,214	56,003

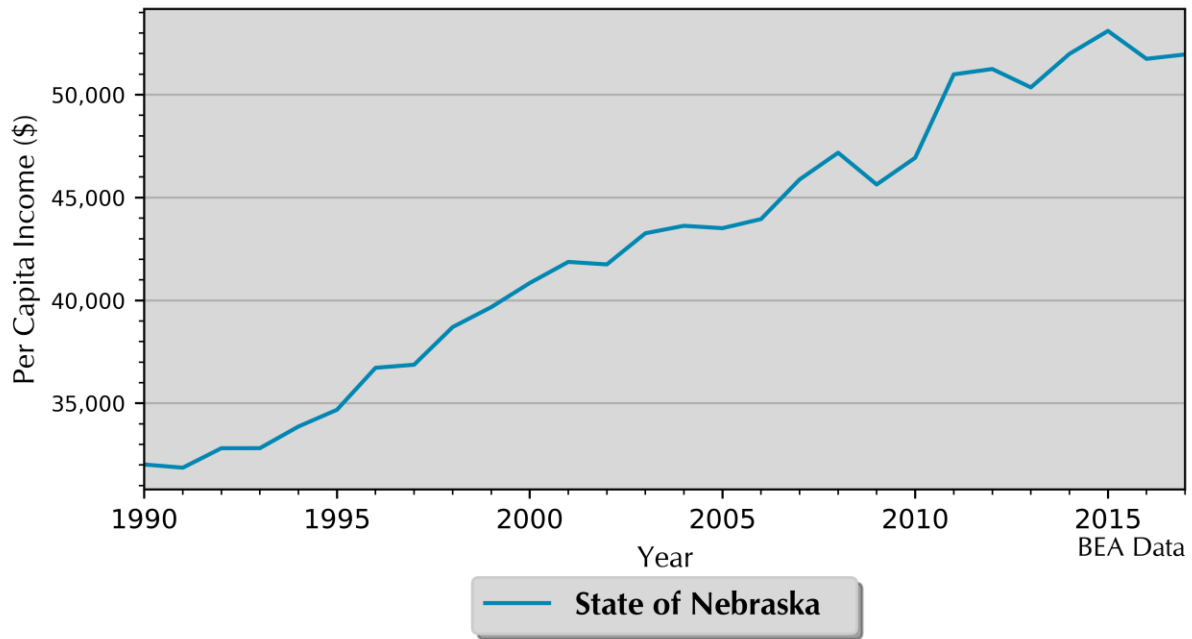
Diagram IV.5 shows real average earnings per job for the State of Nebraska from 1990 to 2017. Over this period the average earning per job for the State of Nebraska was 48,296 dollars. The average earning per job increased steadily until 2010, and since that time has seen a leveling off.

Diagram IV.5
Real Average Earnings per Job
 State of Nebraska



Per capita income is a broader measure of wealth than real average earnings per job, which only captures the working population. Diagram IV.6 shows real per capita income for the State of Nebraska from 1990 to 2017 of 42,711 dollars. Per capita income has increased steadily until 2015, when it has leveled off in the State.

Diagram IV.6
Real per Capita Income
State of Nebraska



Quarterly Census of Employment and Wages

The BLS produces the Quarterly Census of Employment and Wages (QCEW), which reports monthly data on employment and quarterly data on wages and number of business establishments. QCEW employment data represent only filled jobs, whether full or part-time, temporary or permanent, by place of work the pay period. If data does not meet BLS or State agency disclosure standards they are displayed as (ND) and not disclosed. Data from this series are from the period of January 2006 through June 2019 and are presented in Table IV.22, with 2019 data being considered preliminary. Between 2017 and 2018, total annual employment increased from 972,764 persons in 2017 to 978,066 in 2018, a change of 0.5 percent.

Period	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019(p)
Jan	873,321	878,146	894,940	907,451	922,339	933,323	945,354	951,134	956,019	962,794
Feb	874,480	879,050	896,214	909,977	925,023	936,660	947,398	955,495	959,152	962,885
Mar	880,465	886,631	905,965	915,363	930,280	943,395	956,568	962,026	965,136	964,890
Apr	895,149	900,654	916,789	925,626	943,109	955,677	967,532	971,025	973,984	977,565
May	905,980	908,783	927,115	939,515	954,193	965,175	976,341	978,974	986,342	989,731
Jun	910,282	912,360	932,240	942,673	956,854	969,761	979,598	984,517	990,969	991,517
Jul	908,010	906,874	930,068	937,929	952,324	962,188	976,452	978,389	986,509	
Aug	902,002	906,163	922,817	940,216	950,147	965,066	974,484	975,326	982,365	
Sep	900,895	906,633	925,156	939,286	950,696	964,957	975,130	974,188	981,478	
Oct	905,570	910,704	929,662	944,367	955,246	970,777	977,125	979,634	983,902	
Nov	904,089	912,059	931,214	945,741	954,961	970,945	975,378	981,247	987,272	
Dec	902,989	910,954	931,358	945,076	958,152	972,189	971,855	981,212	983,663	
Annual	896,936	901,584	920,295	932,768	946,110	959,176	968,601	972,764	978,066	
% Change	-0.5%	0.5%	2.1%	1.4%	1.4%	1.4%	1.0%	0.4%	0.5%	

The QCEW also reports average weekly wages, which represents total compensation paid during the calendar quarter, regardless of when services were performed. The BLS QCEW data indicated average weekly wages were 863 dollars in 2017. In 2018, average weekly wages saw an increase of 3.1 percent over the prior year, rising to 890 dollars, or by 27 dollars. This data is shown in Table IV.23.

Table IV.23						
Average Weekly Wages						
State of Nebraska						
BLS QCEW Data, 2001–2018						
Year	First Quarter	Second Quarter	Third Quarter	Fourth Quarter	Annual	% Change
2002	562	546	563	594	566	3.7%
2003	579	565	580	613	584	3.2%
2004	595	579	601	648	606	3.8%
2005	600	598	633	663	624	3.0%
2006	649	632	632	687	650	4.2%
2007	666	654	666	723	678	4.3%
2008	687	676	694	730	697	2.8%
2009	699	674	689	757	705	1.1%
2010	694	697	707	772	718	1.8%
2011	721	714	746	762	736	2.5%
2012	764	718	741	797	755	2.6%
2013	777	736	765	796	769	1.9%
2014	798	756	778	837	792	3.0%
2015	817	786	812	880	824	4.0%
2016	816	805	857	875	838	1.7%
2017	867	833	849	901	863	3.0%
2018	897	859	873	930	890	3.1%
2019(p)	918	889				

Total business establishments reported by the QCEW are displayed in Table IV.24. Between 2017 and 2018, the total number of business establishments in Nebraska decreased by 3.1 percent, from 72,292 to 71,615 establishments. The most recent preliminary 2019 estimates show there were 72,567 business establishments in the second quarter of 2019.

Table IV.24						
Number of Business Establishments						
State of Nebraska						
BLS QCEW Data, 2001–2018(p)						
Year	First Quarter	Second Quarter	Third Quarter	Fourth Quarter	Annual	% Change
2001	52,360	52,709	53,040	52,503	52,653	
2002	53,954	54,208	54,633	54,168	54,241	3.0%
2003	54,757	54,959	55,046	54,453	54,804	1.0%
2004	54,792	55,100	55,688	55,162	55,186	0.7%
2005	55,955	56,398	57,082	57,278	56,678	2.7%
2006	57,036	57,478	57,894	57,469	57,469	1.4%
2007	58,303	58,778	59,217	58,747	58,761	2.2%
2008	59,051	59,499	60,073	59,497	59,530	1.3%
2009	59,521	59,693	60,069	59,455	59,685	0.3%
2010	59,246	59,747	60,128	59,653	59,694	(ND)%
2011	59,972	60,366	59,821	60,800	60,240	0.9%
2012	65,265	66,721	66,949	67,819	66,689	10.7%
2013	68,676	69,790	68,369	69,454	69,072	3.6%
2014	70,204	71,157	69,611	70,372	70,336	1.8%
2015	70,754	71,615	70,022	70,874	70,816	0.7%
2016	71,494	72,449	73,202	71,174	72,080	1.8%
2017	71,654	72,633	73,384	71,496	72,292	0.3%
2018	71,811	72,648	70,598	71,404	71,615	-0.9%
2019(p)	71,632	72,567				

Poverty

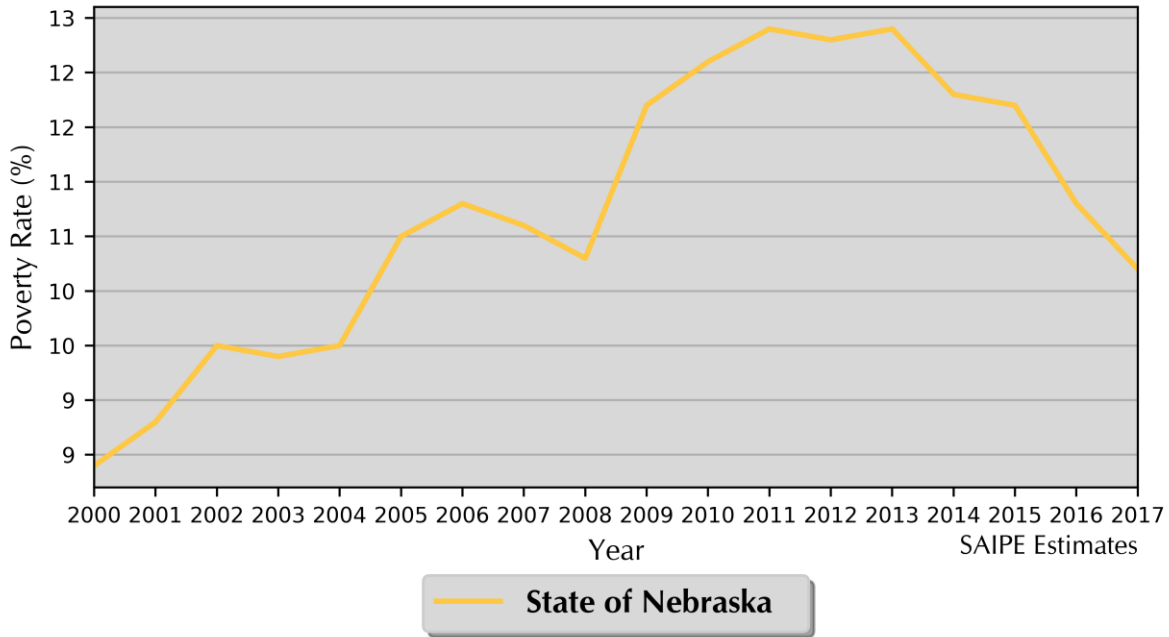
Poverty is the condition of having insufficient resources or income. In its extreme form, poverty is a lack of basic human needs, such as adequate and healthy food, clothing, housing, water, and health services. According to the Census Bureau's Small Area Income and Poverty Estimates Program, the number of individuals in poverty decreased from 224,530 in 2010 to 198,984 in 2017, with the poverty rate reaching 10.7 percent in 2017. This compared to a national rate of 13.4 percent in 2017. Table IV.25, at right, presents poverty data for the State.

The rate of poverty for the State of Nebraska, according to the American Community Survey (ACS) is shown in Table IV.26. These numbers may vary slightly from Table IV.25 due to the different sources of information. However, ACS data allows us to look at poverty in conjunction with other types of ACS data. In 2018, there were an estimated 213,790 people or 11.6 percent living in poverty, compared to 9.7 percent living in poverty in 2000. In 2018, 12.3 percent of those in poverty were under age 6 and 9.8 percent were 65 or older. This data is also displayed in Diagram IV.7 on the following page.

Year	Persons in Poverty	Poverty Rate
2000	148,821	8.9%
2001	156,604	9.3%
2002	169,922	10.0%
2003	170,042	9.9%
2004	172,162	10.0%
2005	186,436	11.0%
2006	194,595	11.3%
2007	190,463	11.1%
2008	186,480	10.8%
2009	212,312	12.2%
2010	224,530	12.6%
2011	230,003	12.9%
2012	230,375	12.8%
2013	234,742	12.9%
2014	225,054	12.3%
2015	224,696	12.2%
2016	208,864	11.3%
2017	198,984	10.7%

Age	2000 Census		2018 Five-Year ACS	
	Persons in Poverty	% of Total	Persons in Poverty	% of Total
Under 6	19,380	12.0%	26,307	12.3%
6 to 17	35,097	21.8%	42,188	19.7%
18 to 64	89,407	55.4%	124,415	58.2%
65 or Older	17,385	10.8%	20,880	9.8%
Total	161,269	100.0%	213,790	100.0%
Poverty Rate	9.7%	.	11.6%	.

Diagram IV.7
Poverty Rates
 State of Nebraska
 SAIPE Estimates 2000 – 2017



Summary

In 2018, unemployment in the State was at 2.8 percent. This is representative of a labor force of 1,020,197 people and 991,688 people employed. Real per capita income has continued to grow in recent years. However, poverty has grown to 11.6 percent, representing 213,790 persons living in poverty in the State, according to ACS data.

Housing

Housing Production

The Census Bureau reports building permit authorizations and “per unit” valuation of building permits by county annually. Single-family construction usually represents most residential development in the county. Single-family building permit authorizations in State of Nebraska decreased from 5,436 authorizations in 2017 to 4,900 in 2018.

The real per unit value of single-family building permits increased from 211,499 dollars in 2017 to 220,051 dollars in 2018. This compares to an increase in per unit permit value statewide, with values rising from 211,499 dollars in 2017 to 220,051 dollars in 2018. Additional details are given in Table IV.27 as well as in Diagram IV.8 and Diagram IV.9.

Year	Authorized Construction in Permit Issuing Areas					Per Unit Valuation, (Real 2017\$)	
	Single-Family	Duplex Units	Tri- and Four-Plex	Multi-Family Units	Total Units	Single-Family Units	Multi-Family Units
1980	4,989	388	317	1,043	6,737	92,250	47,729
1981	2,672	208	217	730	3,827	104,323	43,299
1982	2,464	168	203	843	3,678	95,620	44,243
1983	4,035	284	164	1,048	5,531	99,818	40,119
1984	3,895	284	174	1,433	5,786	113,550	38,253
1985	3,268	256	137	1,340	5,001	114,337	36,026
1986	3,331	266	130	2,509	6,236	120,042	29,344
1987	3,289	184	36	1,393	4,902	122,810	34,078
1988	3,502	138	136	1,967	5,743	131,559	35,697
1989	3,837	162	94	1,948	6,041	127,207	29,468
1990	4,037	150	62	2,507	6,756	127,900	33,015
1991	4,597	172	91	1,403	6,263	124,845	41,835
1992	5,151	192	68	1,399	6,810	133,979	35,464
1993	5,504	232	194	1,870	7,800	140,631	44,375
1994	5,386	278	183	2,030	7,877	142,247	47,700
1995	5,161	230	136	2,637	8,164	140,057	46,855
1996	5,717	342	90	3,942	10,091	142,704	44,570
1997	5,638	382	145	3,716	9,881	144,109	53,291
1998	6,019	276	164	3,101	9,560	155,105	58,912
1999	6,628	246	89	1,733	8,696	159,484	62,761
2000	6,513	154	265	2,173	9,105	155,330	58,608
2001	6,551	154	49	1,444	8,198	159,523	62,242
2002	7,301	200	74	1,765	9,340	170,822	73,975
2003	8,780	288	49	1,350	10,467	176,514	75,968
2004	9,052	288	57	1,523	10,920	180,510	74,776
2005	8,687	186	73	983	9,929	174,423	66,735
2006	6,554	196	110	1,370	8,230	181,066	65,520
2007	6,015	216	100	1,273	7,604	170,848	75,764
2008	4,799	142	36	1,478	6,455	181,401	91,290
2009	4,617	114	28	456	5,215	173,449	85,384
2010	3,828	158	184	1,280	5,450	193,168	70,907
2011	3,661	164	47	1,395	5,267	196,233	63,161
2012	4,401	160	59	1,581	6,201	202,274	72,452
2013	5,241	112	27	2,253	7,633	209,375	67,256
2014	4,798	132	24	2,705	7,659	211,872	96,153
2015	5,198	154	24	2,720	8,096	211,716	97,797
2016	5,080	172	43	2,783	8,078	215,261	86,732
2017	5,436	184	110	3,133	8,863	211,499	93,821
2018	4,900	164	100	2,702	7,866	220,051	73,986

Diagram IV.8
Single-Family Permits
 State of Nebraska
 Census Bureau Data, 1980–2018

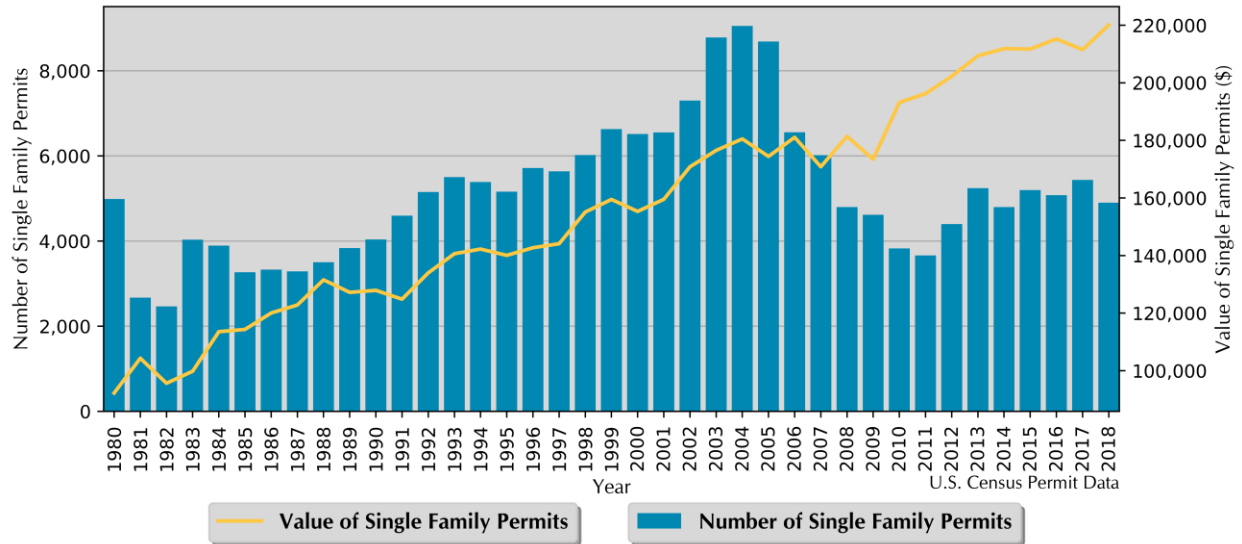
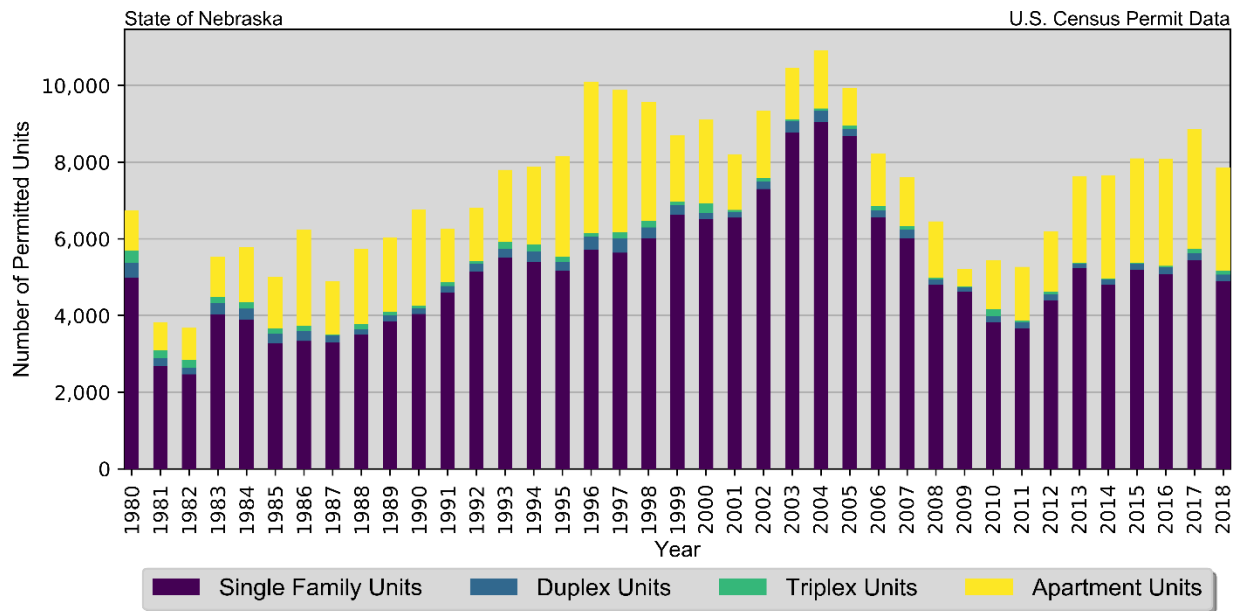


Diagram IV.9
Total Permits by Unit Type
 State of Nebraska
 Census Bureau Data, 1980–2018



Housing Characteristics

Households by type and tenure are shown in Table IV.28. Family households represented 64.2 percent of households in 2018, while non-family households accounted for 35.8 percent. These changed from 64.8 and 35.2 percent in 2010, respectively.

Table IV.28				
Household Type by Tenure				
State of Nebraska				
2010 Census SF1 & 2018 Five-Year ACS Data				
Household Type	2010 Census		2018 Five-Year ACS	
	Households	Households	Households	% of Total
Family Households	467,206	64.8%	484,034	64.2%
Married-Couple Family	366,258	78.4%	379,707	78.4%
Owner-Occupied	310,667	84.8%	318,585	83.9%
Renter-Occupied	55,591	15.2%	61,122	16.1%
Other Family	100,948	21.6%	104,327	20.9%
Male Householder, No Spouse Present	30,223	29.9%	31,450	29.0%
Owner-Occupied	16,333	54%	17,392	55.3%
Renter-Occupied	13,890	46%	14,058	44.7%
Female Householder, No Spouse Present	70,725	70.1%	72,877	67.8%
Owner-Occupied	33,338	47.1%	33,118	45.4%
Renter-Occupied	37,387	52.9%	39,759	54.6%
Non-Family Households	253,924	35.2%	270,029	35.8%
Owner-Occupied	124,392	49%	129,472	47.9%
Renter-Occupied	129,532	51%	140,557	52.1%
Total	721,130	100%	754,063	100.0%

Table IV.29, below, shows housing units by type in 2010 and 2018. In 2010, there were 788,218 housing units, compared with 830,749 in 2018. Single-family units accounted for 76.6 percent of units in 2018, compared to 76.7 in 2010. Apartment units accounted for 15.4 percent in 2018, compared to 14.6 percent in 2010.

Table IV.29				
Housing Units by Type				
State of Nebraska				
2010 & 2018 Five-Year ACS Data				
Unit Type	2010 Five-Year ACS		2018 Five-Year ACS	
	Units	% of Total	Units	% of Total
Single-Family	604,254	76.7%	635,946	76.6%
Duplex	16,338	2.1%	16,122	1.9%
Tri- or Four-Plex	21,201	2.7%	22,024	2.7%
Apartment	114,790	14.6%	127,920	15.4%
Mobile Home	31,392	4%	28,424	3.4%
Boat, RV, Van, Etc.	243	0%	313	0.0%
Total	788,218	100%	830,749	100.0%

Table IV.30 shows housing units by tenure from 2010 to 2018. By 2018, there were 830,749 housing units. An estimated 66.1 percent were owner-occupied, and 9.2 percent were vacant.

Table IV.30				
Housing Units by Tenure				
State of Nebraska				
2010 Census & 2018 Five-Year ACS Data				
Tenure	2010 Census		2018 Five-Year ACS	
	Units	% of Total	Units	% of Total
Occupied Housing Units	721,130	90.5%	754,063	90.8%
Owner-Occupied	484,730	67.2%	498,567	66.1%
Renter-Occupied	236,400	32.8%	255,496	33.9%
Vacant Housing Units	75,663	9.5%	76,686	9.2%
Total Housing Units	796,793	100%	830,749	100.0%

Households by income for the 2010 and 2017 5-year ACS are shown in Table IV.31. Households earning more than 100,000 dollars per year represented 24.7 percent of households in 2018, compared to 16.0 percent in 2010. Meanwhile, households earning less than 15,000 dollars accounted for 9.5 percent of households in 2018, compared to 12.2 percent in 2000.

Table IV.31				
Households by Income				
State of Nebraska				
2010 & 2018 Five-Year ACS Data				
Income	2010 Five-Year ACS		2018 Five-Year ACS	
	Households	% of Total	Households	% of Total
Less than \$15,000	86,938	12.2%	71,996	9.5%
\$15,000 to \$19,999	38,655	5.4%	33,014	4.4%
\$20,000 to \$24,999	43,145	6.1%	36,057	4.8%
\$25,000 to \$34,999	83,307	11.7%	73,534	9.8%
\$35,000 to \$49,999	108,311	15.2%	104,262	13.8%
\$50,000 to \$74,999	146,702	20.6%	145,890	19.3%
\$75,000 to \$99,999	90,871	12.8%	103,433	13.7%
\$100,000 or More	113,842	16%	185,877	24.7%
Total	711,771	100%	754,063	100.0%

Table IV.32 shows households by year home built for the 2010 and 2018 5-year ACS data. Housing units built between 2000 and 2009, account for 10.8 percent of households in 2010 and 12.2 percent of households in 2018. Housing units built in 1939 or earlier represented 19.9 percent of households in 2018 and 22.3 percent of households in 2010.

Table IV.32				
Households by Year Home Built				
State of Nebraska				
2010 & 2018 Five-Year ACS Data				
Year Built	2010 Five-Year ACS		2018 Five-Year ACS	
	Households	% of Total	Households	% of Total
1939 or Earlier	159,072	22.3%	150,114	19.9%
1940 to 1949	39,327	5.5%	36,446	4.8%
1950 to 1959	74,530	10.5%	72,601	9.6%
1960 to 1969	84,339	11.8%	85,140	11.3%
1970 to 1979	124,085	17.4%	121,330	16.1%
1980 to 1989	68,570	9.6%	72,082	9.6%
1990 to 1999	85,047	11.9%	89,332	11.8%
2000 to 2009	76,801	10.8%	92,314	12.2%
2010 or Later	.	.	34,704	4.6%
Total	711,771	100%	754,063	100.0%

The distribution of unit types by race are shown in Table IV.33. An estimated 79.9 percent of white households occupy single-family homes, while 54.4 percent of black households do. Some 13.5 percent of white households occupied apartments, while 35.7 percent of black households do. An estimated 53.9 percent of Asian, and 65.0 percent of American Indian households occupy single-family homes.

Unit Type	White	Black	American Indian	Asian	Native Hawaiian/Pacific Islanders	Other	Two or More Races
Single-Family	79.9%	54.4%	65.0%	53.9%	66.1%	63.7%	65.2%
Duplex	1.7%	3.1%	4.2%	1.8%	1.7%	3.7%	2.6%
Tri- or Four-Plex	2.3%	5.7%	6.9%	3.6%	2.0%	4.9%	3.0%
Apartment	13.5%	35.7%	17.0%	39.4%	23.7%	17.1%	25.1%
Mobile Home	2.6%	1.0%	6.8%	1.3%	0.0%	10.1%	3.9%
Boat, RV, Van, Etc.	0.0%	0.0%	0.0%	0.0%	6.6%	0.5%	0.2%
Total	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%

The disposition of vacant units between 2010 and 2018 are shown in Table IV.34. An estimated 32.3 percent of vacant units were for rent in 2010. In addition, some 12.1 percent of vacant units were for sale. "Other" vacant units represented 31.8 percent of vacant units in 2010. "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.

By 2018, for rent units accounted for 19.5 percent of vacant units, while for sale units accounted for 7.2 percent. "Other" vacant units accounted for 44.5 percent of vacant units, representing a total of 34,127 "other" vacant units.

Disposition	2010 Census		2018 Five-Year ACS	
	Units	% of Total	Units	% of Total
For Rent	24,404	32.3%	14,921	19.5%
For Sale	9,167	12.1%	5,535	7.2%
Rented Not Occupied	1,279	1.7%	2,558	3.3%
Sold Not Occupied	2,804	3.7%	3,094	4.0%
For Seasonal, Recreational, or Occasional Use	13,881	18.3%	16,326	21.3%
For Migrant Workers	60	0.1%	125	0.2%
Other Vacant	24,068	31.8%	34,127	44.5%
Total	75,663	100%	76,686	100.0%

Table IV.35, shows the number of households in the State by number of bedrooms and tenure. There were 10,708 rental households with no bedrooms, otherwise known as studio apartments. Two-bedroom households accounted for 25.9 percent of total households in State of Nebraska. In State of Nebraska the 304,992 households with three bedrooms accounted for 36.7 percent of all households, and there were only 50,903 five-bedroom or more households, which accounted for 6.1 percent of all households.

Number of Bedrooms	Tenure		Total	% of Total
	Own	Rent		
None	757	10,708	14,778	1.8%
One	9,426	69,539	90,895	10.9%
Two	91,746	96,197	215,023	25.9%
Three	226,712	55,588	304,992	36.7%
Four	127,403	17,947	154,158	18.6%
Five or more	42,523	5,517	50,903	6.1%
Total	754,063	255,496	830,749	100.0%

The age of a structure influences its value. As shown in Table IV.36, structures built in 1939 or earlier had a median value of, 95,900 while structures built between 1950 and 1959 had a median value of 113,300 and those built between 1990 to 1999 had a median value of 204,400. The newest structures tended to have the highest values and those built between 2010 and 2013 and from 2014 or later had median values of 276,500 and, 330,900 respectively. The total median value in the State of Nebraska was, 147,800.

Year Structure Built	Median Value
1939 or earlier	95,900
1940 to 1949	92,800
1950 to 1959	113,300
1960 to 1969	132,700
1970 to 1979	146,100
1980 to 1989	166,300
1990 to 1999	204,400
2000 to 2009	233,800
2010 to 2013	276,500
2014 or later	330,900
Median Value	147,800

Household mortgage status is reported in Table IV.37. In Nebraska, households with a mortgage accounted for 60.8 percent of all households or 303,343 housing units, and the remaining 53.8 percent or 268,442 units had no mortgage. Of those units with a mortgage, 33,549 had either a second mortgage or home equity loan, 1,352 had both a second mortgage and home equity loan, and 268,442 or 53.8 percent had no second mortgage or no home equity loan.

Table IV.37		
Mortgage Status		
State of Nebraska		
2018 5-Year ACS Data		
Mortgage Status	State of Nebraska	
	Households	% of Households
Housing units with a mortgage, contract to purchase, or similar debt	303,343	60.8
With either a second mortgage or home equity loan, but not both	33,549	6.7
Second mortgage only	9,320	1.9
Home equity loan only	24,229	4.9
Both second mortgage and home equity loan	1,352	0.3
No second mortgage and no home equity loan	268,442	53.8
Housing units without a mortgage	195,224	39.2
Total	498,567	100.0%

Table IV.38 lists the State of Nebraska median rent as \$648 and the median home value as \$147,800.

Table IV.38	
Median Rent	
State of Nebraska	
2018 5-Year ACS Data	
Place	Rent
Median Rent	\$648
Median Home Value	\$147,800

Home Mortgage Loans

The FFEIC The Home Mortgage Disclosure Act (HMDA) was enacted by Congress in 1975. Data collected under the HMDA provide a comprehensive portrait of home loan activity, including information pertaining to home purchase loans, home improvement loans, and refinancing. For the analysis only owner-occupied originated loans for single-family units were considered. As can be seen in Table IV.39, of the 38,481 loans in 2017, 22,867 loans were for home purchases, 3,774 were for home improvement and 11,840 were for refinancing.

Year	Home Purchase	Home Improvement	Refinancing	Total
2008	16,883	4,160	18,316	39,359
2009	18,609	3,430	39,291	61,330
2010	14,890	3,115	37,630	55,635
2011	13,634	2,882	29,066	45,582
2012	16,205	3,211	41,369	60,785
2013	18,418	3,624	27,547	49,589
2014	19,156	3,511	11,691	34,358
2015	22,511	4,050	16,123	42,684
2016	23,087	4,175	19,082	46,344
2017	22,867	3,774	11,840	38,481

Table IV.40 shows the average loan value by loan type. In 2008, average home purchase loans was 137,998 dollars and 179,144 dollars in 2017. Overall, average loans were 124,601 dollars in 2008 and 161,066 dollars in 2017.

Year	Home Purchase	Home Improvement	Refinancing	Total
2008	\$137,998	\$34,331	\$132,754	\$124,601
2009	\$135,800	\$42,716	\$149,929	\$139,646
2010	\$142,134	\$42,439	\$146,072	\$139,215
2011	\$143,969	\$42,499	\$142,132	\$136,382
2012	\$151,549	\$54,064	\$148,611	\$144,400
2013	\$155,648	\$49,609	\$138,056	\$138,126
2014	\$159,704	\$42,398	\$133,926	\$138,945
2015	\$164,463	\$56,579	\$155,939	\$151,007
2016	\$173,859	\$70,495	\$169,409	\$162,715
2017	\$179,144	\$66,290	\$156,359	\$161,066

Table IV.41 shows the total volume of owner-occupied single-family loans. In 2008, the total home purchase loans was 4,904,162,000 dollars and 4,096,494,000 dollars in 2017. Overall, total loans were 4,904,162,000 dollars in 2008 and 6,197,964,000 dollars in 2017.

Year	Home Purchase	Home Improvement	Refinancing	Total
2008	\$2,329,827,000	\$142,816,000	\$2,431,519,000	\$4,904,162,000
2009	\$2,527,101,000	\$146,515,000	\$5,890,872,000	\$8,564,488,000
2010	\$2,116,379,000	\$132,199,000	\$5,496,673,000	\$7,745,251,000
2011	\$1,962,880,000	\$122,482,000	\$4,131,223,000	\$6,216,585,000
2012	\$2,455,859,000	\$173,598,000	\$6,147,880,000	\$8,777,337,000
2013	\$2,866,722,000	\$179,784,000	\$3,803,034,000	\$6,849,540,000
2014	\$3,059,298,000	\$148,858,000	\$1,565,724,000	\$4,773,880,000
2015	\$3,702,236,000	\$229,145,000	\$2,514,212,000	\$6,445,593,000
2016	\$4,013,887,000	\$294,318,000	\$3,232,656,000	\$7,540,861,000
2017	\$4,096,494,000	\$250,180,000	\$1,851,290,000	\$6,197,964,000

Summary

The State experienced a drop-off in housing production during the recent recession, which has leveled off since that time. In 2018, there were 7,866 total units produced in the study area, with 4,900 of these being single-family units. The value of single-family permits, however, has continued to rise, reaching \$220,051 in 2018. Since 2010, the study area has not seen an increase in the proportion of vacant units, however there has been a rise in the proportion of “other” vacant units.

B. SEGREGATION AND INTEGRATION

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.

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 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 .¹⁰

This is the formula that HUD uses to calculate dissimilarity index 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.

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.¹¹

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

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

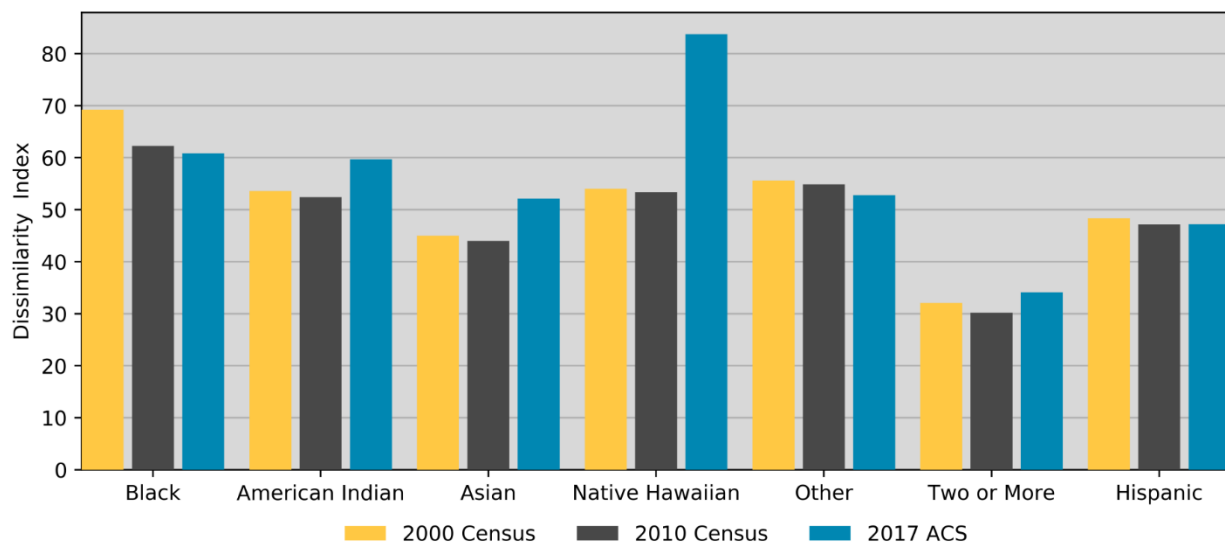
¹⁰ Affirmatively Furthering Fair Housing Data Documentation. HUD. December 2015.

¹¹ 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.

Segregation Levels

Diagram IV.10 shows the rate of segregation by race and ethnicity for 2000, 2010, and 2017. During this time period, black households have had a decreasing level of segregation, ending at a high level of segregation. American Indian households had a high level of segregation in 2017, which has grown from 2000. The level of segregation for Asian households has also increased from 2000 to 2017, resulting in a moderate level of segregation. Native Hawaiian households increased significantly in terms of segregation, according to the dissimilarity index, resulting in a high level of segregation in 2017. “Other” race households had a moderate level of segregation in 2017. Two or more race households are also seeing a rate of increase in the dissimilarity index but remain at a low level of segregation. Hispanic households had at a moderate level of segregation in 2017. Overall, the State of Nebraska saw increasing levels of segregation for many minority populations.

Diagram IV.10
Dissimilarity Index
State of Nebraska



C. RACIALLY OR ETHNICALLY CONCENTRATED AREAS OF POVERTY

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

R/ECAPs over Time

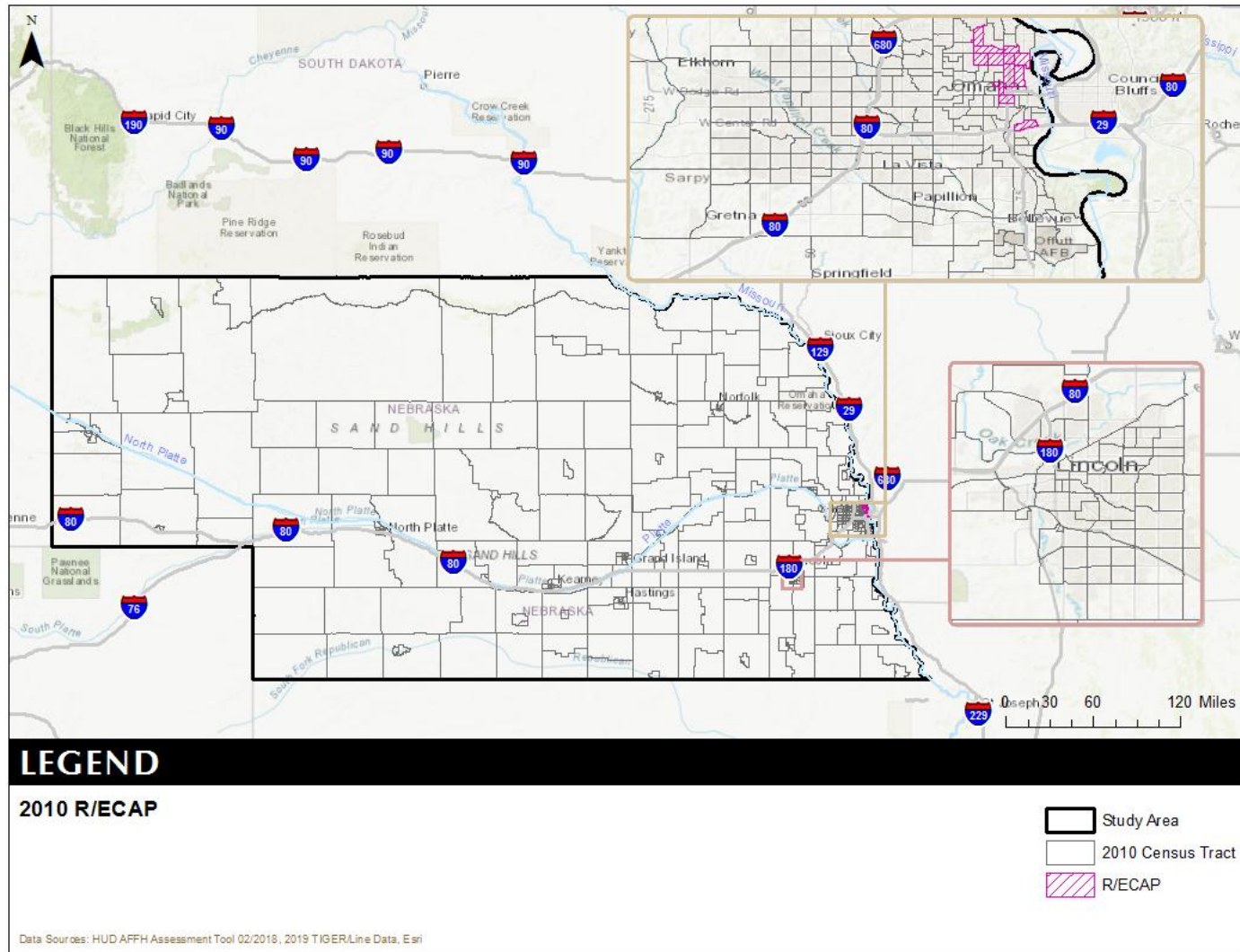
The R/ECAPS in the State of Nebraska are illustrated in the maps on the following pages. The number of R/ECAPs decreased from 2010 to 2018. R/ECAPs tended to be found in the more urban areas of the State, in and adjacent to the Cities of Omaha and Lincoln. This was true for both 2010, which had 12 R/ECAPS and 11 in 2018.

In addition, the City of Lincoln identified one of the City’s R/ECAPs as invalid in their Analysis of Impediments, stating, “The second, Census Tract 35, includes only the Lincoln Regional Center. The Regional Center is a 250-bed, Joint Commission accredited, state psychiatric hospital operated by the

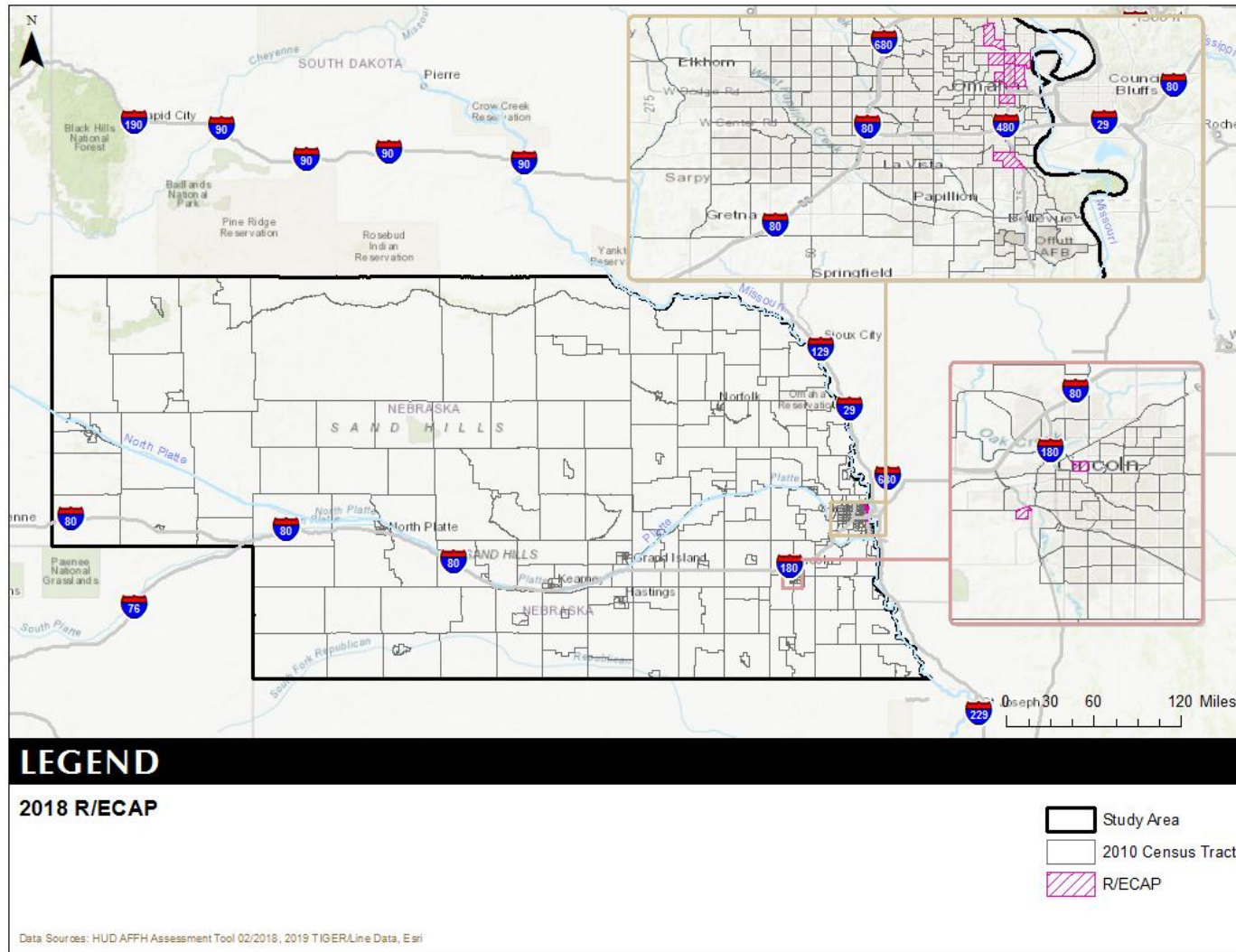
Nebraska Department of Health and Human Services. The center serves people who need very specialized psychiatric services and provides services to people who, because of mental illness, require a highly structured treatment setting. We feel that Census Tract 35 does not merit further examination in subsequent questions.”¹²

¹² <https://www.lincoln.ne.gov/city/urban/reports/pdf/AIFH-2018.pdf>

Map IV.3
2010 R/ECAPs
State of Nebraska
HUD AFFH Database, 2018 ACS



Map IV.4
2018 R/ECAPs
State of Nebraska
HUD AFFH Database, 2018 ACS



D. DISPARITIES IN ACCESS TO OPPORTUNITY

The following section describes the HUD defined terms of Access to Opportunity. These measures, as outlined below, describe a set of conditions that may or may not accurately reflect the actual conditions in the study area. These data are supplemented by local data when available and ultimately provide only a piece of the total understanding of access to the various opportunities in the community. They are used as measured to compare geographic trends and levels of access within the community.

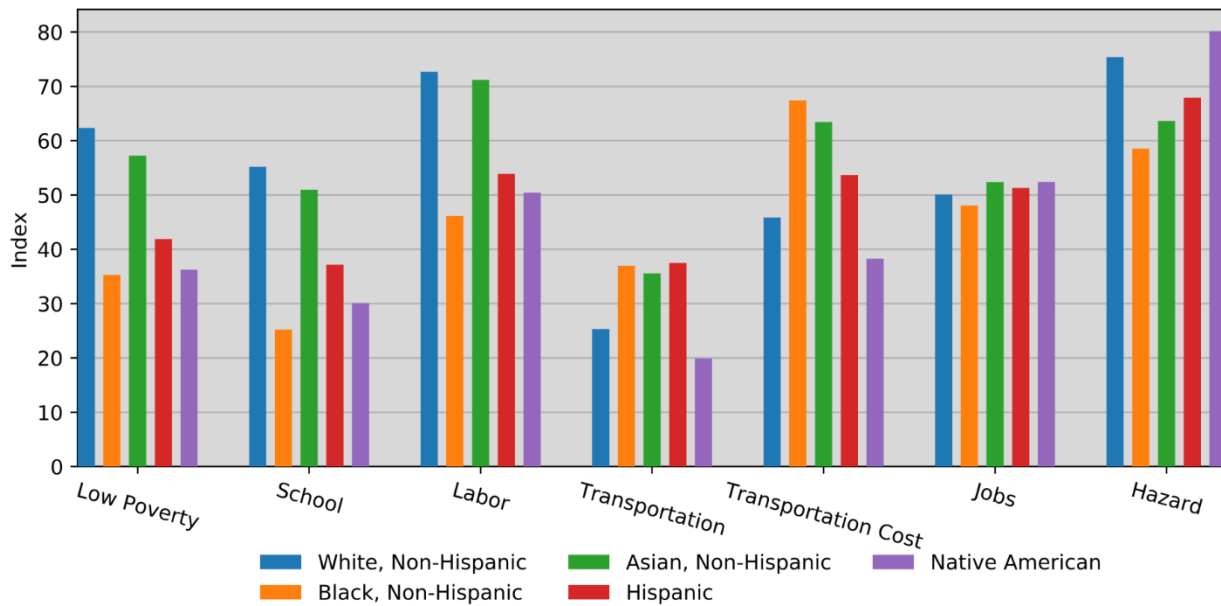
Areas of opportunity are physical places, areas within communities that provide things one needs to thrive, including quality employment, well performing schools, affordable housing, efficient public transportation, safe streets, essential services, adequate parks, and full-service grocery stores. Areas 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 4th 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 Cost – Estimates of transportation costs for a family that meets the following description: a 3-person single-parent family with income at 50% of the median income for renters for the region
- 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

Diagram IV.11 shows the level of access to opportunities by race and ethnicity. Black, Hispanic and Native American households have lower access to Low Poverty areas, compared to other races and ethnicities in the State. Black, Hispanic, and Native American households also have markedly lower access to school proficiency. Black, Hispanic, and Native American households have lower access to labor market engagement. There is little variance by race for access to transportation trips and transportation cost. There is little variance by race or ethnicity to job proximity and environmental health.

Diagram IV.11
Access to Opportunity
 State of Nebraska

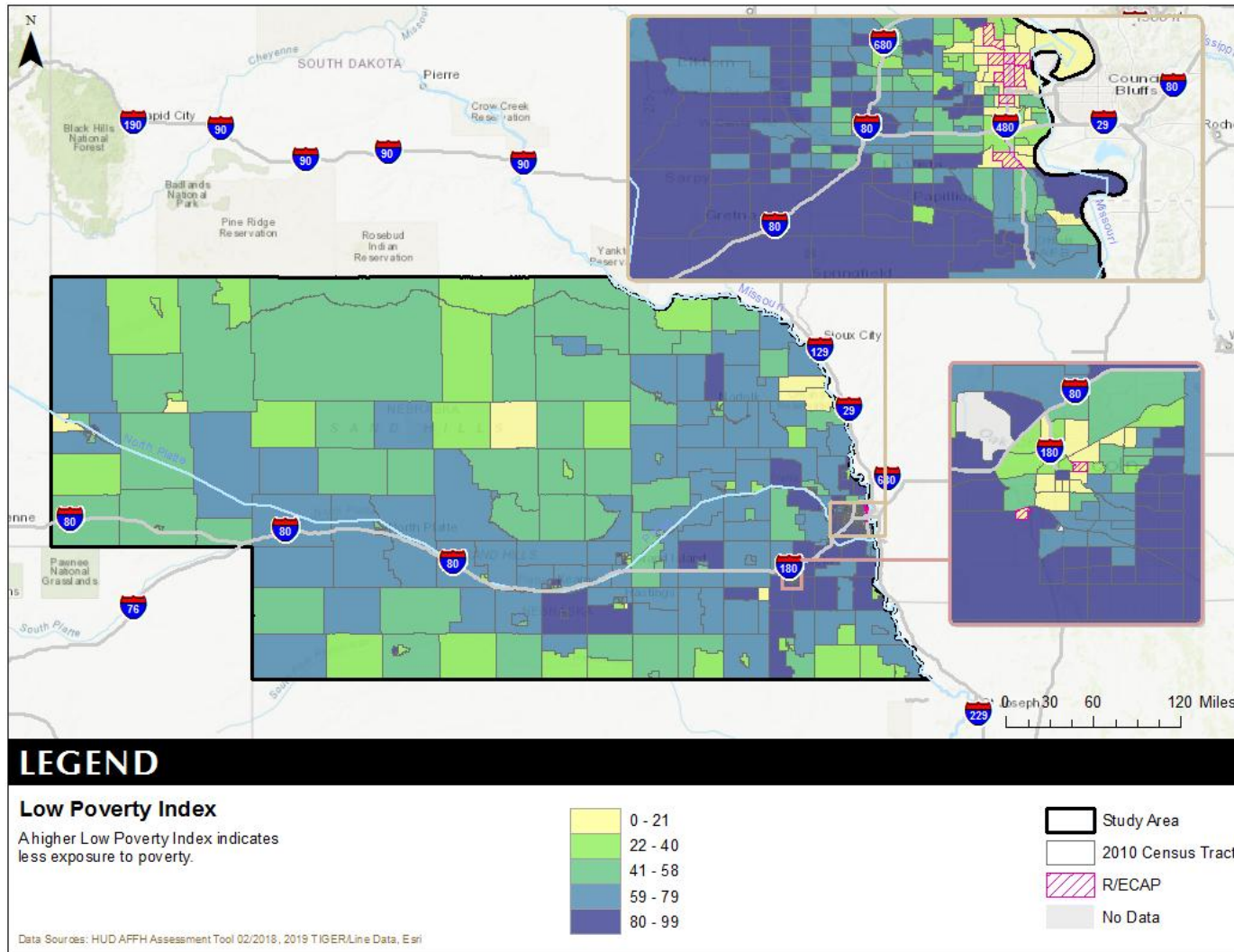


LOW POVERTY INDEX

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

The highest scores were found in the more suburban areas of the State, in areas around the Cities of Omaha and Lincoln. Conversely, the lowest scores were in the urban areas of Lincoln and Omaha, as well as scattered in the more rural parts of the State.

Map IV.5
Low Poverty
 State of Nebraska
 HUD AFFH Database



SCHOOL PROFICIENCY INDEX

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.

The highest School Proficiency indices were scattered throughout the State, as well as areas outside the Cities of Omaha and Lincoln. The city centers of Lincoln and Omaha, as well as areas scattered throughout the more rural areas of the State had the lowest school proficiencies, according to the School Proficiency Index.

JOBS PROXIMITY INDEX

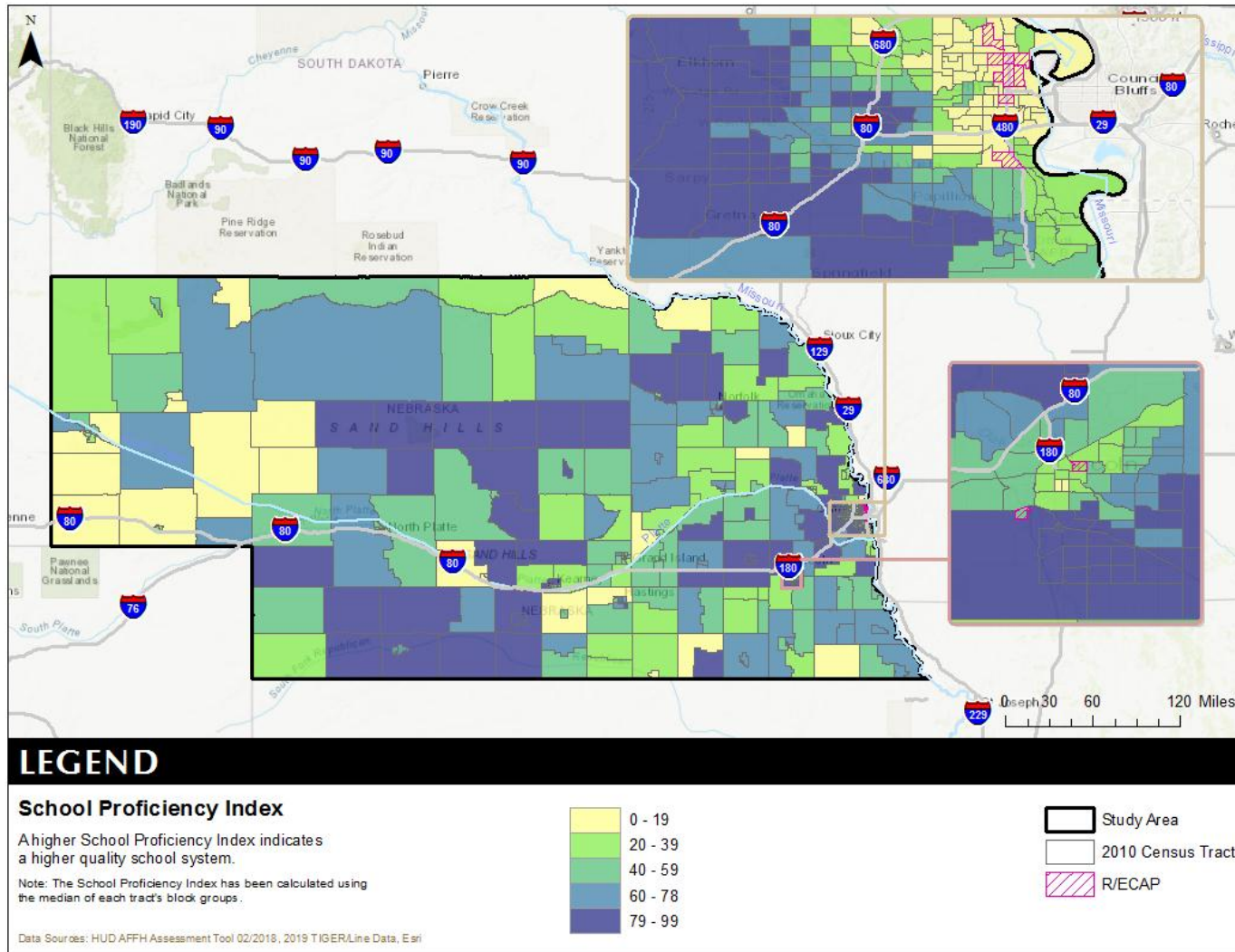
The Jobs Proximity Index measures the physical distances between place of residence and jobs and is shown in Map IV.7. Job proximity varied widely across the State. As one would expect, the areas closest to the city centers had the highest job proximity index ratings.

LABOR MARKET ENGAGEMENT INDEX

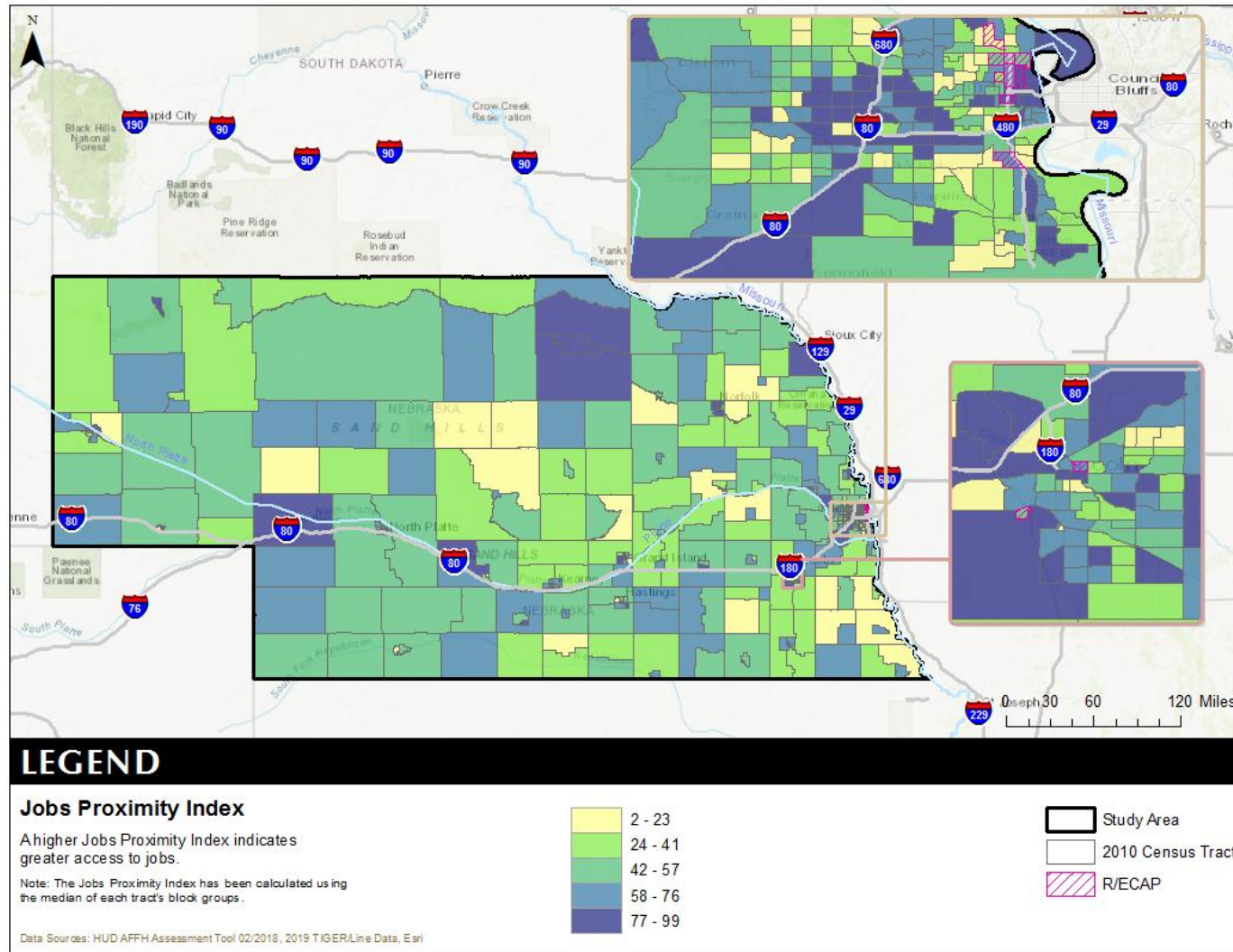
The Labor Market Engagement Index provides a measure of unemployment rate, labor-force participation rate, and percent of the population ages 25 and above with at least a bachelor's degree, by neighborhood. Map IV.8 shows the labor market engagement for the study area. Areas outside of Omaha and Lincoln as well as most of rural areas of the State had the highest rates of labor market engagement. On the other hand, areas in central Omaha and Lincoln tended to have lower levels of labor market engagement.

While there may seem to be a contradiction in job proximity and labor market engagement in the varying geographical distribution between these two measures, job proximity does not equate to labor market engagement. While there may be the physical access to jobs, as shown by job proximity, persons may not be able to access these jobs without the appropriate education or training to acquire these jobs. These two measures show separately the physical access to jobs and the degree to which households are engaged in the marketplace, including the unemployment rate and education level of households in the State.

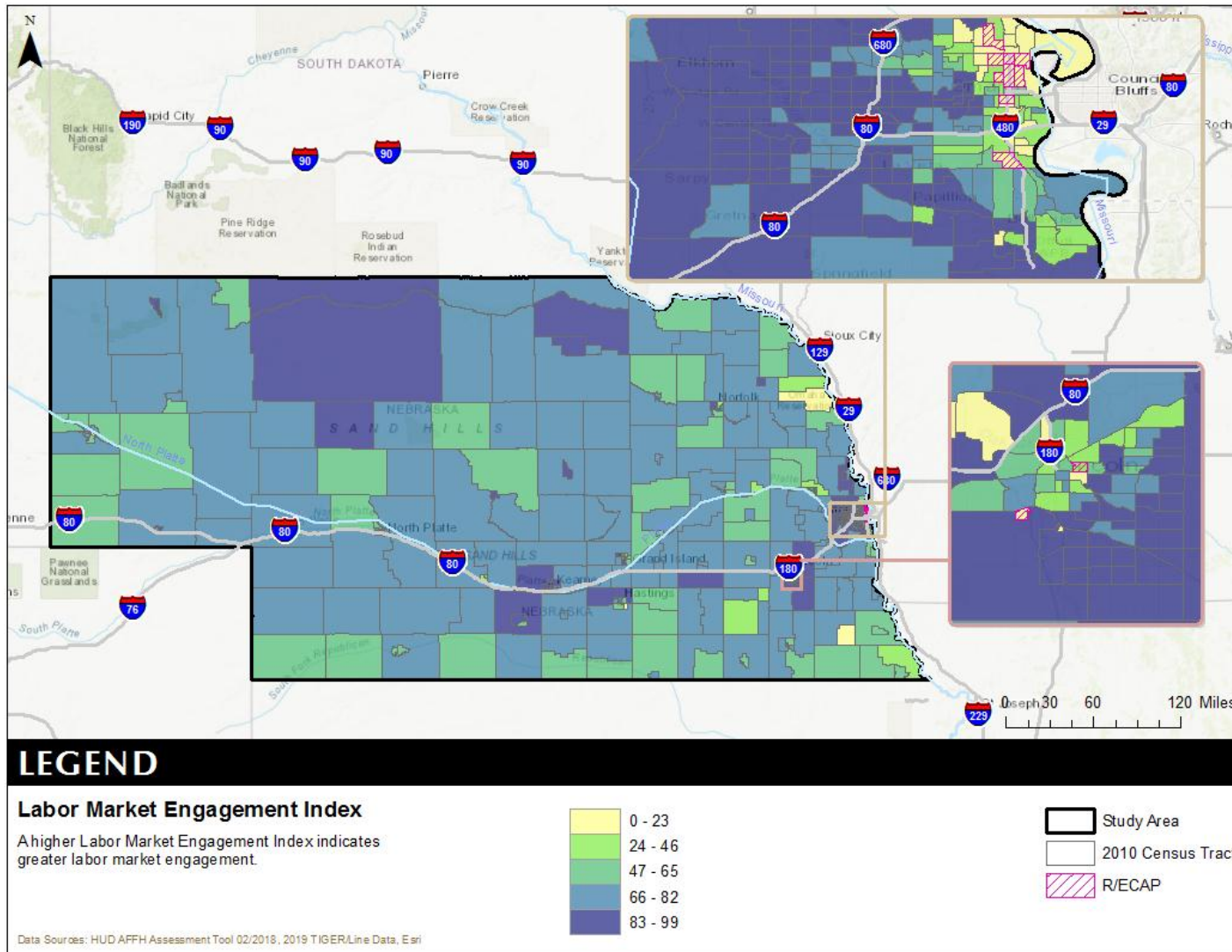
Map IV.6
School Proficiency
 State of Nebraska
 HUD AFFH Database



Map IV.7
Job Proximity
 State of Nebraska
 HUD AFFH Database



Map IV.8
Labor Market Engagement
 State of Nebraska
 HUD AFFH Database



TRANSPORTATION TRIP INDEX

The Transportation Trip Index is defined as 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. It measures proximity to public transportation by neighborhood. There was little difference in index rating across racial and ethnic groups. The Transportation Trip Index measures proximity to public transportation by neighborhood. The Transit Trips Index measures how often low-income families in a neighborhood use public transportation. The highest rate of transit trips were in the more urban parts of the State, while the lowest ratings were in the more rural parts of the State.

LOW TRANSPORTATION COST INDEX

The Low Transportation Cost Index is defined as 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. It measures cost of transport and proximity to public transportation by neighborhood. Transportation Costs saw a similar pattern as with Transit Trips; the highest transportation cost index ratings were in the more urban parts of the State, while lower index ratings were in the rural parts of the study area.

ENVIRONMENTAL HEALTH INDEX

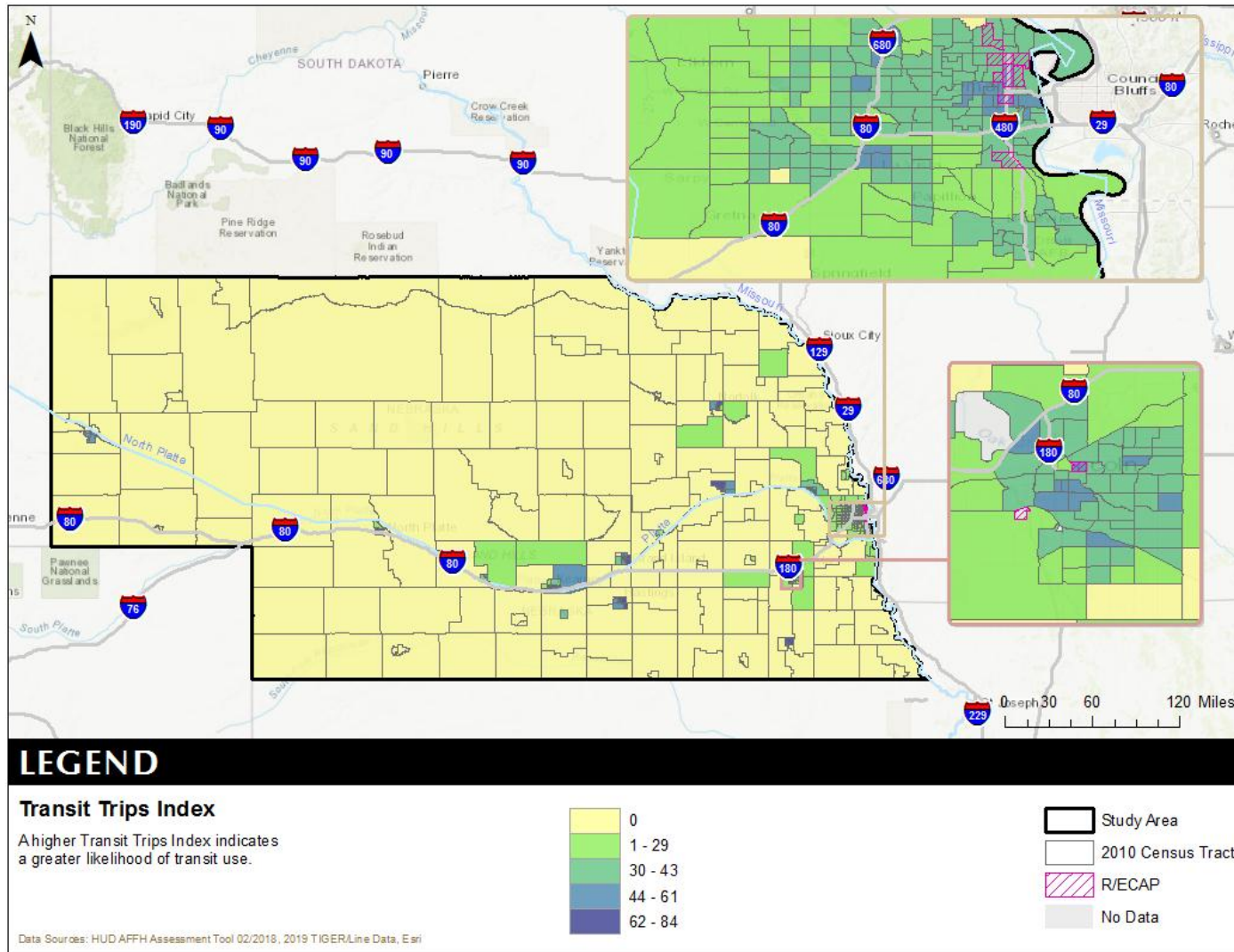
The Environmental Health Index measures exposure based on EPA estimates of air quality carcinogenic, respiratory and neurological toxins by neighborhood.

The more rural parts of the State had the highest environmental health index ratings. Areas closer to the city centers had lower index ratings.

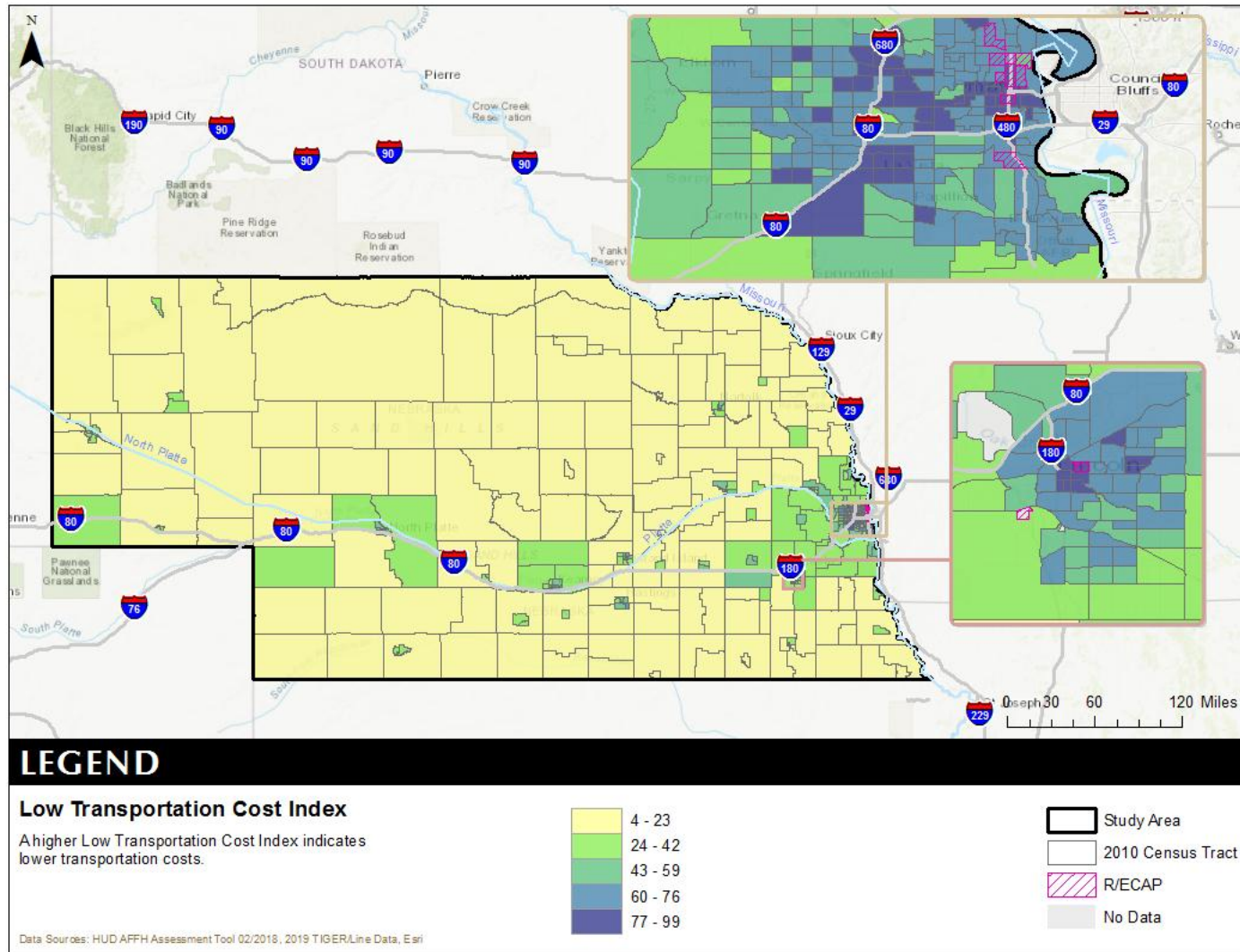
PATTERNS IN DISPARITIES IN ACCESS TO OPPORTUNITY

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

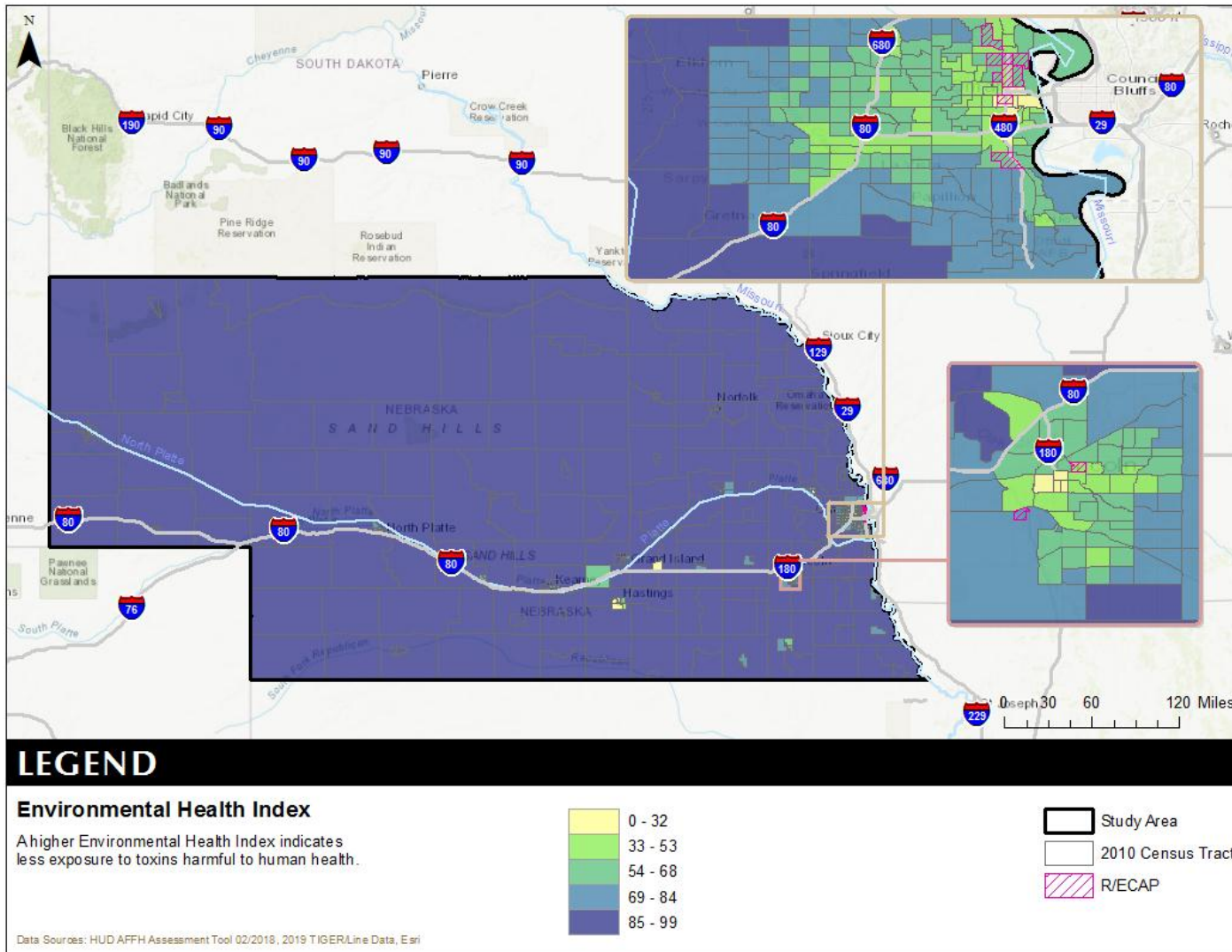
Map IV.9
Transit Trips
 State of Nebraska
 HUD AFFH Database



Map IV.10
Transportation Cost
 State of Nebraska
 HUD AFFH Database



Map IV.11
Environmental Health
 State of Nebraska
 HUD AFFH Database



E. DISPROPORTIONATE HOUSING NEEDS

The Census Bureau collects data on several topics that HUD has identified as “housing problems”. For the purposes of this report, housing problems include overcrowding, incomplete plumbing or kitchen facilities, and cost-burden.

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.42. In 2018, an estimated 1.5 percent of households were overcrowded, and an additional 0.5 percent were severely overcrowded.

Data Source	No Overcrowding		Overcrowding		Severe Overcrowding		Total
	Households	% of Total	Households	% of Total	Households	% of Total	
Owner							
2010 Five-Year ACS	483,328	99%	3,915	0.8%	791	0.2%	488,034
2018 Five-Year ACS	492,837	98.9%	4,701	0.9%	1,029	0.2%	498,567
Renter							
2010 Five-Year ACS	216,242	96.7%	5,780	2.6%	1,715	0.8%	223,737
2018 Five-Year ACS	246,349	96.4%	6,358	2.5%	2,789	1.1%	255,496
Total							
2010 Five-Year ACS	699,570	98.3%	9,695	1.4%	2,506	0.4%	711,771
2018 Five-Year ACS	739,186	98.0%	11,059	1.5%	3,818	0.5%	754,063

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. This data is displayed in Table IV.43 and Table IV.44.

There was a total of 2,392 households with incomplete plumbing facilities in 2018, representing 0.3 percent of households in State of Nebraska. This is compared to 0.4 percent of households lacking complete plumbing facilities in 2010.

Households	2010 Five-Year ACS	2018 Five-Year ACS
With Complete Plumbing Facilities	709,231	751,671
Lacking Complete Plumbing Facilities	2,540	2,392
Total Households	711,771	754,063
Percent Lacking	0.4%	0.3%

There were 8,356 households lacking complete kitchen facilities in 2018, compared to 5,574 households in 2010. This was a change from 0.8 percent of households in 2010 to 1.1 percent in 2018.

Table IV.44		
Households with Incomplete Kitchen Facilities		
State of Nebraska		
2010 and 2018 Five-Year ACS Data		
Households	2010 Five-Year ACS	2018 Five-Year ACS
With Complete Kitchen Facilities	706,197	745,707
Lacking Complete Kitchen Facilities	5,574	8,356
Total Households	711,771	754,063
Percent Lacking	0.8%	1.1%

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

As seen in Table IV.45, in the State of Nebraska 14.4 percent of households had a cost burden and 10.2 percent had a severe cost burden. Some 20.7 percent of renters were cost burdened, and 18.1 percent were severely cost burdened. Owner-occupied households without a mortgage had a cost burden rate of 7.2 percent and a severe cost burden rate of 4.8 percent. Owner occupied households with a mortgage had a cost burden rate of 13.7 percent, and severe cost burden at 7.0 percent.

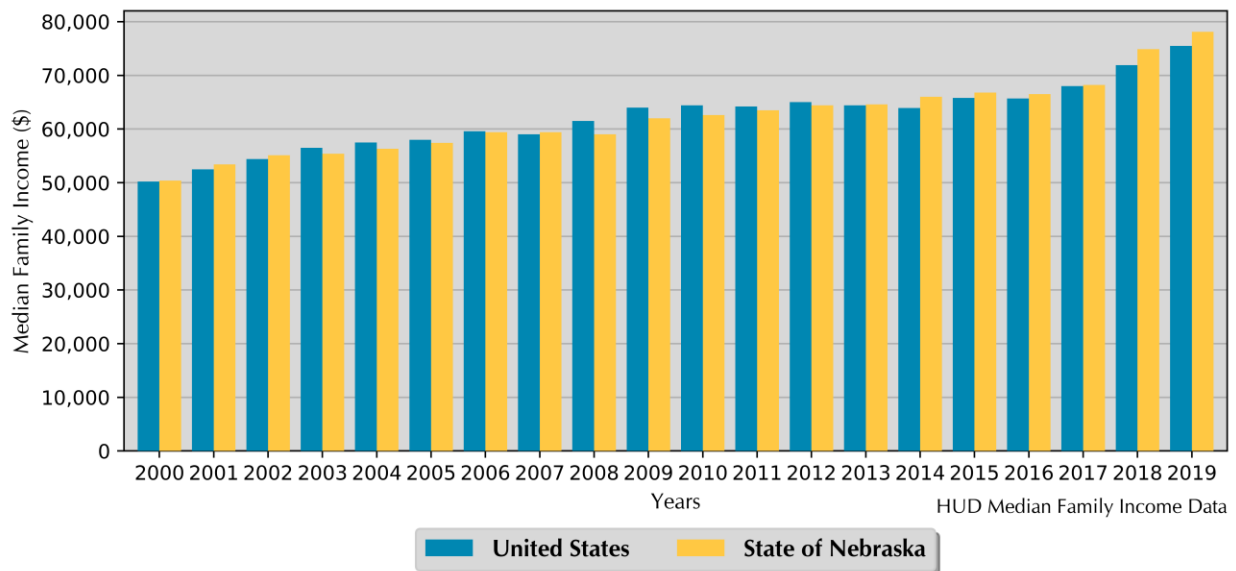
Table IV.45									
Cost Burden and Severe Cost Burden by Tenure									
State of Nebraska									
2010 & 2018 Five-Year ACS Data									
Data Source	Less Than 30%		31%-50%		Above 50%		Not Computed		Total
	Households	% of Total	Households	% of Total	Households	% of Total	Households	% of Total	
Owner With a Mortgage									
2010 Five-Year ACS	231,650	73.7%	56,177	17.9%	25,875	8.2%	690	0.2%	314,392
2018 Five-Year ACS	239,436	78.9%	41,687	13.7%	21,225	7.0%	995	0.3%	303,343
Owner Without a Mortgage									
2010 Five-Year ACS	148,872	85.7%	14,615	8.4%	9,001	5.2%	1,154	0.7%	173,642
2018 Five-Year ACS	169,894	87.0%	14,133	7.2%	9,363	4.8%	1,834	0.9%	195,224
Renter									
2010 Five-Year ACS	116,944	52.3%	45,837	20.5%	42,176	18.9%	18,780	8.4%	223,737
2018 Five-Year ACS	136,616	53.5%	52,967	20.7%	46,168	18.1%	19,745	7.7%	255,496
Total									
2010 Five-Year ACS	497,466	69.9%	116,629	16.4%	77,052	10.8%	20,624	2.9%	711,771
2018 Five-Year ACS	545,946	72.4%	108,787	14.4%	76,756	10.2%	22,574	3.0%	754,063

Housing Problems by Income

Very low-income renters are those who earn less than 50 percent of the area median income (AMI), and include a significant proportion of extremely low-income renters (who earn less than 30 percent of AMI). Households with worst case needs are defined as very low-income renters who do not receive government housing assistance and who pay more than 50 percent of their income for rent, live in severely inadequate conditions, or both. Table IV.46 shows that the HUD estimated MFI for State of Nebraska was \$74,900 in 2018. Diagram IV.12, illustrates the estimated MFI for 2000 through 2018.

Table IV.46 Median Family Income State of Nebraska 2000–2019 HUD MFI		
Year	MFI	State of Nebraska MFI
2000	50,400	50,400
2001	53,400	53,400
2002	55,100	55,100
2003	55,400	55,400
2004	56,300	56,300
2005	57,400	57,400
2006	59,400	59,400
2007	59,400	59,400
2008	59,000	59,000
2009	62,000	62,000
2010	62,600	62,600
2011	63,500	63,500
2012	64,400	64,400
2013	64,600	64,600
2014	66,000	66,000
2015	66,800	66,800
2016	66,500	66,500
2017	68,200	68,200
2018	74,900	74,900
2019	78,100	78,100

Diagram IV.12
Estimated Median Family Income
State of Nebraska vs. United States
HUD Data: 2000 - 2019



As seen in Table IV.48, the most common housing problem tends to be housing cost burdens. More than 137,836 households have a cost burden and 110,950 have a severe cost burden. Some 52,861 renter households are impacted by cost burdens, and 47,579 are impacted by severe cost burdens. On the other hand, some 84,975 owner-occupied households have cost burdens, and 63,371 have severe cost burdens.

There was a total of 84,975 owner-occupied and 52,861 renter-occupied households with a cost burden of greater than 30 percent and less than 50 percent. An additional 63,371 owner-occupied 47,579 renter-occupied households had a cost burden greater than 50 percent of income. Overall there are 812,050 households without a housing problem.

Housing Problem	\$0 to \$19,050	\$19,051 to \$31,750	\$31,751 to \$50,800	\$50,801 to \$63,500	Above \$63,500	Total
Owner-Occupied						
Lacking complete plumbing or kitchen facilities	47.7%	40.3%	53.6%	42.2%	62.7%	50.8%
Severely Overcrowded with > 1.51 people per room (and complete kitchen and plumbing)	22.1%	27.2%	43%	28.2%	78%	42.5%
Overcrowded - With 11-1.5 people per room (and none of the above problems)	29.8%	41.1%	51.5%	51%	70.6%	50.4%
Housing cost burden greater than 50% of income (and none of the above problems)	47.8%	60.3%	86.1%	95.2%	93.3%	57.1%
Housing cost burden greater than 30% of income (and none of the above problems)	55.6%	46.3%	58.7%	79.9%	94.5%	61.6%
Zero/negative income (and none of the above problems)	47.6%	%	%	%	%	47.6%
Has none of the 4 housing problems	45.9%	70.4%	70.1%	76.3%	85.9%	79.7%
Total	48%	60.1%	67.9%	76.2%	86%	73.8%
Renter-Occupied						
Lacking complete plumbing or kitchen facilities	52.3%	59.7%	46.4%	57.8%	37.3%	49.2%
Severely Overcrowded with > 1.51 people per room (and complete kitchen and plumbing)	77.9%	72.8%	57%	71.8%	22%	57.5%
Overcrowded - With 11-1.5 people per room (and none of the above problems)	70.2%	58.9%	48.5%	49%	29.4%	49.6%
Housing cost burden greater than 50% of income (and none of the above problems)	52.2%	39.7%	13.9%	4.8%	6.7%	42.9%
Housing cost burden greater than 30% of income (and none of the above problems)	44.4%	53.7%	41.3%	20.1%	5.5%	38.4%
Zero/negative income (and none of the above problems)	52.4%	%	%	%	%	52.4%
Has none of the 4 housing problems	54.1%	29.6%	29.9%	23.7%	14.1%	20.3%
Total	52%	39.9%	32.1%	23.8%	14%	26.2%

Table IV.48
Housing Problems by Income and Tenure

State of Nebraska
2012–2016 HUD CHAS Data

Housing Problem	\$0 to \$19,050	\$19,051 to \$31,750	\$31,751 to \$50,800	\$50,801 to \$63,500	Above \$63,500	Total
Owner-Occupied						
Lacking complete plumbing or kitchen facilities	1,371	602	866	336	1,416	4,591
Severely Overcrowded with > 1.51 people per room (and complete kitchen and plumbing)	315	255	605	191	1,143	2,509
Overcrowded - With 11-1.5 people per room (and none of the above problems)	776	888	1,632	862	2,435	6,593
Housing cost burden greater than 50% of income (and none of the above problems)	31,745	16,795	10,230	2,305	2,296	63,371
Housing cost burden greater than 30% of income (and none of the above problems)	11,900	19,045	24,800	11,195	18,035	84,975
Zero/negative income (and none of the above problems)	10,330	0	0	0	0	10,330
Has none of the 4 housing problems	13,025	44,980	91,115	68,015	430,080	647,215
Total	69,462	82,565	129,248	82,904	455,405	819,584
Renter-Occupied						
Lacking complete plumbing or kitchen facilities	1,506	890	750	460	841	4,447
Severely Overcrowded with > 1.51 people per room (and complete kitchen and plumbing)	1,110	681	801	486	322	3,400
Overcrowded - With 11-1.5 people per room (and none of the above problems)	1,825	1,275	1,535	827	1,015	6,477
Housing cost burden greater than 50% of income (and none of the above problems)	34,600	11,040	1,656	117	166	47,579
Housing cost burden greater than 30% of income (and none of the above problems)	9,485	22,085	17,415	2,825	1,051	52,861
Zero/negative income (and none of the above problems)	11,385	0	0	0	0	11,385
Has none of the 4 housing problems	15,340	18,890	38,920	21,150	70,535	164,835
Total	75,251	54,861	61,077	25,865	73,930	290,984
Total						
Lacking complete plumbing or kitchen facilities	2,877	1,492	1,616	796	2,257	9,038
Severely Overcrowded with > 1.51 people per room (and complete kitchen and plumbing)	1,425	936	1,406	677	1,465	5,909
Overcrowded - With 11-1.5 people per room (and none of the above problems)	2,601	2,163	3,167	1,689	3,450	13,070
Housing cost burden greater than 50% of income (and none of the above problems)	66,345	27,835	11,886	2,422	2,462	110,950
Housing cost burden greater than 30% of income (and none of the above problems)	21,385	41,130	42,215	14,020	19,086	137,836
Zero/negative income (and none of the above problems)	21,715	0	0	0	0	21,715
Has none of the 4 housing problems	28,365	63,870	130,035	89,165	500,615	812,050
Total	144,713	137,426	190,325	108,769	529,335	1,110,568

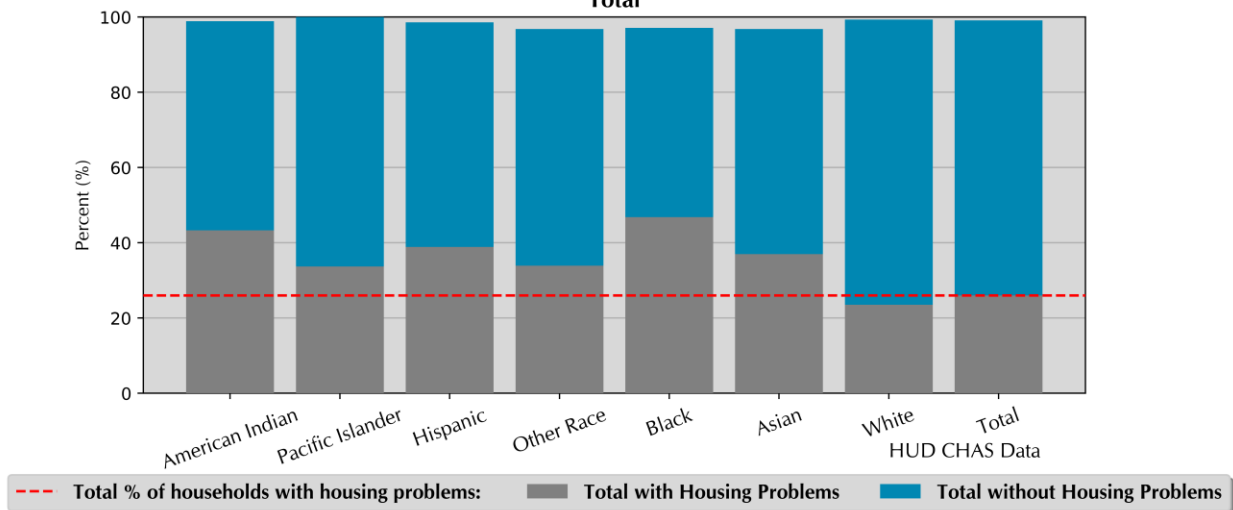
Housing Problems by Income, Race, and Tenure

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

Overall, there are 192,609 households with housing problems in State of Nebraska. This includes 14,935 black households, 4,460 Asian households, 1,815 American Indian, 145 Pacific Islander, and 2,764 “other” race households with housing problems. As for ethnicity, there are 19,240 Hispanic households with housing problems. As shown in Table IV.49, black, Asian, American Indian, and Hispanic households face a disproportionate share of housing problems. The statewide average rate of housing problems is 26 percent, while the black households face housing problems at a rate of 46.8 percent, Asian households at a rate of 37 percent, American Indian households at a rate of 43.3 percent, and 38.9 percent for Hispanic households.

Table IV.49								
Percent of Total Households with Housing Problems by Income and Race								
State of Nebraska								
2012–2016 HUD CHAS Data								
Income	Non-Hispanic by Race						Hispanic (Any Race)	Total
	White	Black	Asian	American Indian	Pacific Islander	Other Race		
With Housing Problems								
\$0 to \$23,430	76.2%	77.6%	77.8%	76.3%	100%	73.2%	83.8%	77%
\$23,431 to \$39,050	57.9%	67.2%	70.7%	60.4%	88.2%	59.4%	64.1%	59.5%
\$39,051 to \$62,480	28%	30%	29.7%	25.6%	29.2%	25.7%	28.4%	28.1%
\$62,481 to \$78,100	12.6%	10.2%	23.3%	13.6%	0%	6.4%	13.6%	12.7%
Above \$78,100	3.8%	4.9%	8.7%	8%	0%	2.9%	6.2%	4%
Total	23.5%	46.8%	37%	43.3%	33.7%	33.9%	38.9%	26%
Without Housing Problems								
\$0 to \$23,430	16.9%	13.2%	6.8%	20.2%	0%	13.4%	8.3%	15.4%
\$23,431 to \$39,050	42.1%	32.8%	29.3%	39.6%	11.8%	40.6%	35.9%	40.5%
\$39,051 to \$62,480	72%	70%	70.3%	74.4%	70.8%	74.3%	71.6%	71.9%
\$62,481 to \$78,100	87.4%	89.8%	76.7%	86.4%	100%	93.6%	86.4%	87.3%
Above \$78,100	96.2%	95.1%	91.3%	92%	100%	97.1%	93.8%	96%
Total	75.8%	50.3%	59.8%	55.6%	66.3%	62.9%	59.7%	73.1%

Diagram IV.13
Total Housing Problems by Race
 State of Nebraska
 Total



Income	Non-Hispanic by Race						Hispanic (Any Race)	Total
	White	Black	Asian	American Indian	Pacific Islander	Other Race		
With Housing Problems								
\$0 to \$23,430	52,970	7,850	1,995	1,060	35	1,420	7,500	72,830
\$23,431 to \$39,050	42,145	4,630	1,170	420	75	790	6,630	55,860
\$39,051 to \$62,480	33,125	1,885	645	215	35	435	3,565	39,905
\$62,481 to \$78,100	9,480	280	250	45	0	49	825	10,929
Above \$78,100	11,530	290	400	75	0	70	720	13,085
Total	149,250	14,935	4,460	1,815	145	2,764	19,240	192,609
Total								
\$0 to \$23,430	69,530	10,115	2,565	1,389	35	1,940	8,950	94,524
\$23,431 to \$39,050	72,835	6,885	1,655	695	85	1,330	10,340	93,825
\$39,051 to \$62,480	118,190	6,290	2,170	840	120	1,690	12,540	141,840
\$62,481 to \$78,100	75,035	2,740	1,075	330	55	764	6,055	86,054
Above \$78,100	299,785	5,910	4,600	940	135	2,420	11,565	325,355
Total	635,375	31,940	12,065	4,194	430	8,144	49,450	741,598

In the State of Nebraska, 3,125 black homeowner households face housing problems, 1,465 Asian homeowner households, and 7,115 Hispanic homeowner households face housing problems.

Table IV.51 Percent of Homeowner Households with Housing Problems by Income and Race State of Nebraska 2012–2016 HUD CHAS Data								
Income	Non-Hispanic by Race						Hispanic (Any Race)	Total
	White	Black	Asian	American Indian	Pacific Islander	Other Race		
With Housing Problems								
\$0 to \$23,430	73.1%	75%	77.2%	83.7%	100%	73.7%	81.2%	73.9%
\$23,431 to \$39,050	48.6%	60%	53.9%	50%	100%	61.5%	64.3%	50.5%
\$39,051 to \$62,480	28.9%	39%	47.3%	23.6%	0%	25.3%	35.5%	29.8%
\$62,481 to \$78,100	14.5%	17.7%	28.6%	18.4%	0%	12.9%	13.5%	14.6%
Above \$78,100	3.7%	4.2%	7%	5.6%	0%	3%	5.9%	3.9%
Total	16.8%	31.2%	25.9%	26.4%	19.5%	22.7%	30.8%	18%
Without Housing Problems								
\$0 to \$23,430	18.2%	16.9%	13%	14.4%	0%	9.2%	13.5%	17.6%
\$23,431 to \$39,050	51.4%	40%	46.1%	50%	0%	38.5%	35.7%	49.5%
\$39,051 to \$62,480	71.1%	61%	52.7%	76.4%	100%	74.7%	64.5%	70.2%
\$62,481 to \$78,100	85.5%	82.3%	71.4%	81.6%	100%	87.1%	86.5%	85.4%
Above \$78,100	96.3%	95.8%	93%	94.4%	100%	97%	94.1%	96.1%
Total	82.7%	67.8%	73.3%	73.3%	80.5%	75.5%	68.7%	81.5%

**Diagram IV.14
Owner Housing Problems by Race**

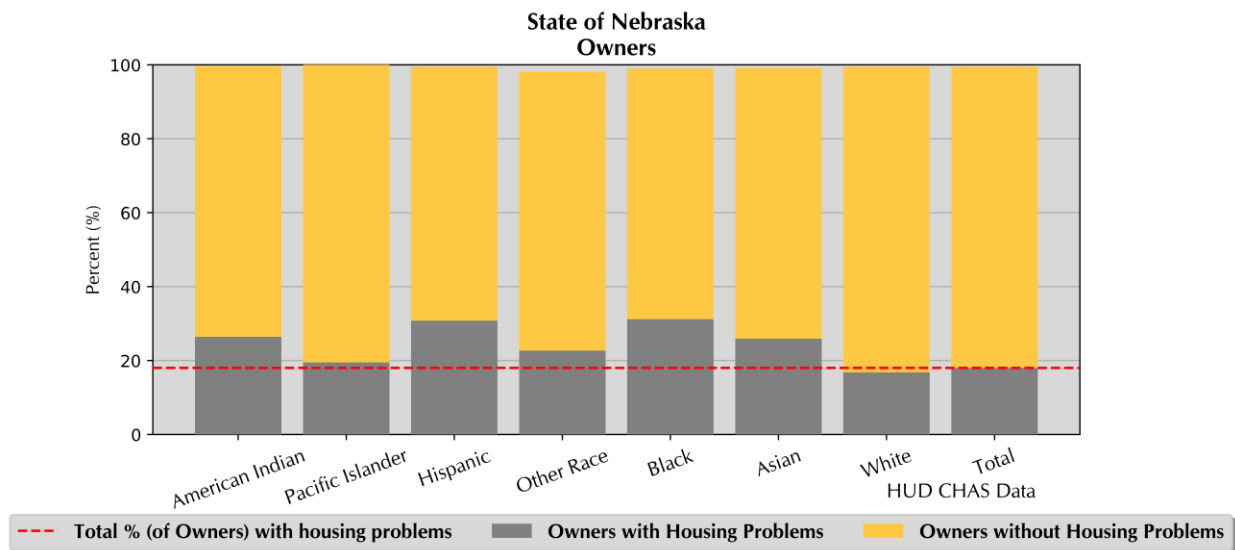


Table IV.52
Homeowner Households with Housing Problems by Income and Race

State of Nebraska
 2012–2016 HUD CHAS Data

Income	Non-Hispanic by Race						Hispanic (Any Race)	Total
	White	Black	Asian	American Indian	Pacific Islander	Other Race		
With Housing Problems								
\$0 to \$23,430	18,995	975	355	175	25	280	1,810	22,615
\$23,431 to \$39,050	17,960	915	275	75	15	240	2,310	21,790
\$39,051 to \$62,480	20,695	890	480	85	0	195	2,070	24,415
\$62,481 to \$78,100	7,680	180	130	35	0	45	445	8,515
Above \$78,100	9,675	165	225	35	0	50	480	10,630
Total	75,005	3,125	1,465	405	40	810	7,115	87,965
Total								
\$0 to \$23,430	25,980	1,300	460	209	25	380	2,230	30,584
\$23,431 to \$39,050	36,935	1,525	510	150	15	390	3,595	43,120
\$39,051 to \$62,480	71,570	2,280	1,015	360	30	770	5,835	81,860
\$62,481 to \$78,100	52,850	1,015	455	190	40	350	3,300	58,200
Above \$78,100	258,400	3,905	3,215	625	95	1,675	8,140	276,055
Total	445,735	10,025	5,655	1,534	205	3,565	23,100	489,819

In total, some 104,644 households face housing problems in the State of Nebraska. Of these, some 11,810 black households, 2,995 Asian households, and 12,125 Hispanic renter households face housing problems.

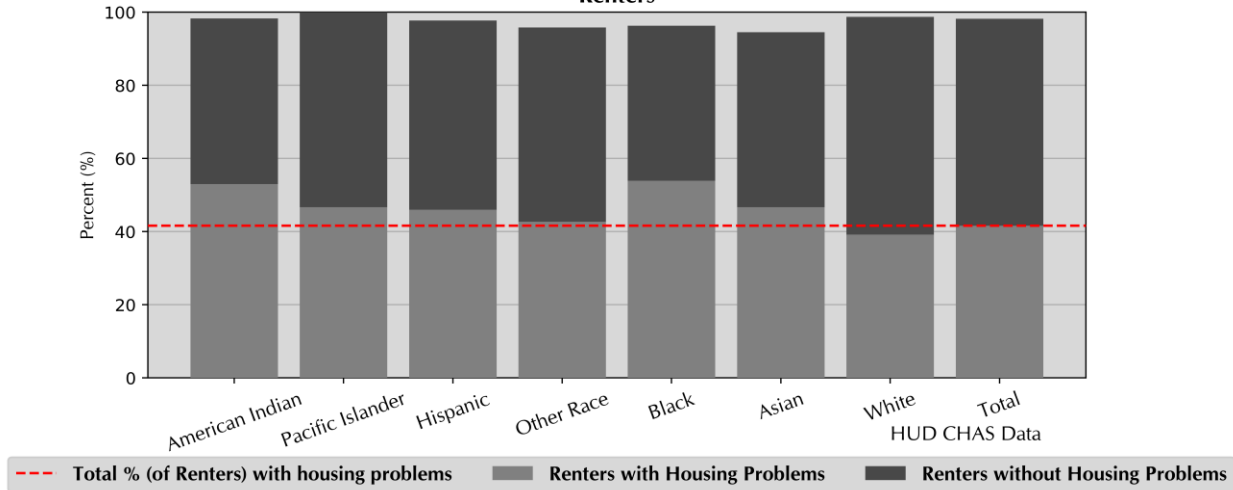
Table IV.53
Renter Households with Housing Problems by Income and Race

State of Nebraska
 2012–2016 HUD CHAS Data

Income	Non-Hispanic by Race						Hispanic (Any Race)	Total
	White	Black	Asian	American Indian	Pacific Islander	Other Race		
With Housing Problems								
\$0 to \$23,430	33,975	6,875	1,640	885	10	1,140	5,690	50,215
\$23,431 to \$39,050	24,185	3,715	895	345	60	550	4,320	34,070
\$39,051 to \$62,480	12,430	995	165	130	35	240	1,495	15,490
\$62,481 to \$78,100	1,800	100	120	10	0	4	380	2,414
Above \$78,100	1,855	125	175	40	0	20	240	2,455
Total	74,245	11,810	2,995	1,410	105	1,954	12,125	104,644
Total								
\$0 to \$23,430	43,550	8,815	2,105	1,180	10	1,560	6,720	63,940
\$23,431 to \$39,050	35,900	5,360	1,145	545	70	940	6,745	50,705
\$39,051 to \$62,480	46,620	4,010	1,155	480	90	920	6,705	59,980
\$62,481 to \$78,100	22,185	1,725	620	140	15	414	2,755	27,854
Above \$78,100	41,385	2,005	1,385	315	40	745	3,425	49,300
Total	189,640	21,915	6,410	2,660	225	4,579	26,350	251,779

Table IV.54 Percent of Renter Households with Housing Problems by Income and Race State of Nebraska 2012–2016 HUD CHAS Data								
Income	Non-Hispanic by Race						Hispanic (Any Race)	Total
	White	Black	Asian	American Indian	Pacific Islander	Other Race		
With Housing Problems								
\$0 to \$23,430	78%	78%	77.9%	75%	100%	73.1%	84.7%	78.5%
\$23,431 to \$39,050	67.4%	69.3%	78.2%	63.3%	85.7%	58.5%	64%	67.2%
\$39,051 to \$62,480	26.7%	24.8%	14.3%	27.1%	38.9%	26.1%	22.3%	25.8%
\$62,481 to \$78,100	8.1%	5.8%	19.4%	7.1%	0%	1%	13.8%	8.7%
Above \$78,100	4.5%	6.2%	12.6%	12.7%	0%	2.7%	7%	5%
Total	39.2%	53.9%	46.7%	53%	46.7%	42.7%	46%	41.6%
Without Housing Problems								
\$0 to \$23,430	16.2%	12.7%	5.5%	21.2%	0%	14.4%	6.5%	14.4%
\$23,431 to \$39,050	32.6%	30.7%	21.8%	36.7%	14.3%	41.5%	36%	32.8%
\$39,051 to \$62,480	73.3%	75.2%	85.7%	72.9%	61.1%	73.9%	77.7%	74.2%
\$62,481 to \$78,100	91.9%	94.2%	80.6%	92.9%	100%	99%	86.2%	91.3%
Above \$78,100	95.5%	93.8%	87.4%	87.3%	100%	97.3%	93%	95%
Total	59.5%	42.4%	47.8%	45.3%	53.3%	53.1%	51.7%	56.6%

Diagram IV.14
Renter Housing Problems by Race
State of Nebraska
Renters



These racial/ethnic groups were also disproportionately impacted by severe housing problems, as seen in Table IV.55. Severe housing problems include overcrowding at a rate of more than 1.5 persons per room and housing costs exceeding 50 percent of the household income. Some 8,745 black homeowner households face severe housing problems, as well as 2,915 Asian homeowner households, and 4,025 Hispanic homeowner households.

Table IV.55								
Percent of Homeowner Households with Severe Housing Problems by Income and Race								
State of Nebraska								
2012–2016 HUD CHAS Data								
Income	Non-Hispanic by Race						Hispanic (Any Race)	Total
	White	Black	Asian	American Indian	Pacific Islander	Other Race		
With A Severe Housing Problem								
\$0 to \$23,430	52.1%	57.1%	67.4%	71.8%	100%	53.9%	59.2%	53.3%
\$23,431 to \$39,050	20%	28.9%	30.4%	20%	0%	17.9%	34.4%	21.6%
\$39,051 to \$62,480	6.7%	5.5%	17.2%	5.6%	0%	5.8%	15.5%	7.4%
\$62,481 to \$78,100	2.6%	3%	7.8%	13.2%	0%	1.1%	6.5%	2.9%
Above \$78,100	0.9%	1.2%	3.6%	4.8%	0%	1.8%	4.3%	1.1%
Total	6.6%	13.8	14%	16.7%	12.2%	9.9%	17.4%	7.4%
Without A Severe Housing Problems								
\$0 to \$23,430	39.2%	34.9%	22.8%	26.3%	0%	28.9%	35.4%	38.3%
\$23,431 to \$39,050	80%	71.1%	69.6%	80%	100%	82.1%	65.6%	78.4%
\$39,051 to \$62,480	93.3%	94.5%	82.8%	94.4%	100%	94.2%	84.5%	92.6%
\$62,481 to \$78,100	97.4%	97%	92.2%	86.8%	100%	98.9%	93.5%	97.1%
Above \$78,100	99.1%	98.8%	96.4%	95.2%	100%	98.2%	95.7%	98.9%
Total	92.9%	85.1%	85.2%	83.1%	87.8%	88.2%	82.1%	92.1%

Table IV.56								
Percent of Renter Households with Severe Housing Problems by Income and Race								
State of Nebraska								
2012–2016 HUD CHAS Data								
Income	Non-Hispanic by Race						Hispanic (Any Race)	Total
	White	Black	Asian	American Indian	Pacific Islander	Other Race		
With A Severe Housing Problem								
\$0 to \$23,430	61.7%	63.1%	62.5%	61.4%	100%	58%	69.5%	62.7%
\$23,431 to \$39,050	20%	21.2%	39.9%	19.4%	80%	11.7%	19.1%	20.4%
\$39,051 to \$62,480	6.8%	11.7%	5.2%	16.7%	0%	4.3%	12.7%	7.8%
\$62,481 to \$78,100	4.1%	3.5%	19.4%	7.1%	0%	1%	11.1%	5.1%
Above \$78,100	3.3%	6.2%	12.6%	12.7%	0%	2.7%	7%	4%
Total	20.8%	33.6%	33.2%	36.2%	31.1%	23.6%	27.9%	23.2%
Without A Severe Housing Problems								
\$0 to \$23,430	32.5%	27.6%	20.9%	34.7%	0%	29.5%	21.7%	30.3%
\$23,431 to \$39,050	80%	78.8%	60.1%	80.6%	20%	88.3%	80.9%	79.6%
\$39,051 to \$62,480	93.2%	88.3%	94.8%	83.3%	100%	95.7%	87.3%	92.2%
\$62,481 to \$78,100	95.9%	96.5%	80.6%	92.9%	100%	99%	88.9%	94.9%
Above \$78,100	96.7%	93.8%	87.4%	87.3%	100%	97.3%	93%	96%
Total	77.8%	62.7%	61.4%	62.1%	31.1%	72.2%	69.8%	75%

Table IV.57
Percent of Total Households with Severe Housing Problems by Income and Race

State of Nebraska
 2012–2016 HUD CHAS Data

Income	Non-Hispanic by Race						Hispanic (Any Race)	Total
	White	Black	Asian	American Indian	Pacific Islander	Other Race		
With A Severe Housing Problem								
\$0 to \$23,430	58.1%	62.3%	63.4%	63%	100%	57.2%	66.9%	59.6%
\$23,431 to \$39,050	20%	22.9%	37%	19.6%	66.7%	13.5%	24.4%	20.9%
\$39,051 to \$62,480	6.7%	9.5%	10.8%	11.9%	0%	5%	14%	7.6%
\$62,481 to \$78,100	3.1%	3.3%	14.5%	10.6%	0%	1%	8.6%	3.6%
Above \$78,100	1.3%	2.9%	6.3%	7.5%	0%	2.1%	5.1%	1.5%
Total	10.9%	27.4%	24.2%	29%	22.1%	17.6%	23%	12.8%
Without A Severe Housing Problems								
\$0 to \$23,430	35%	28.5%	21.2%	33.5%	0%	29.4%	25.1%	32.9%
\$23,431 to \$39,050	80%	77.1%	63%	80.4%	33.3%	86.5%	75.6%	79.1%
\$39,051 to \$62,480	93.3%	90.5%	89.2%	88.1%	100%	95%	86%	92.4%
\$62,481 to \$78,100	96.9%	96.7%	85.5%	89.4%	100%	99%	91.4%	96.4%
Above \$78,100	98.7%	97.1%	93.7%	92.5%	100%	97.9%	94.9%	98.5%
Total	88.4%	69.7%	72.6%	69.8%	77.9%	79.2%	75.5%	86.3%

Table IV.58
Total Households with Severe Housing Problems by Income and Race

State of Nebraska
 2012–2016 HUD CHAS Data

Income	Non-Hispanic by Race						Hispanic (Any Race)	Total
	White	Black	Asian	American Indian	Pacific Islander	Other Race		
With A Severe Housing Problem								
\$0 to \$23,430	40,405	6,310	1,625	875	35	1,110	5,990	56,350
\$23,431 to \$39,050	14,565	1,580	610	135	60	180	2,525	19,655
\$39,051 to \$62,480	7,960	595	235	100	0	85	1,755	10,730
\$62,481 to \$78,100	2,310	90	155	35	0	8	520	3,118
Above \$78,100	3,780	170	290	70	0	50	590	4,950
Total	69,020	8,745	2,915	1,215	95	1,433	11,380	94,803
Total								
\$0 to \$23,430	69,525	10,125	2,565	1,389	35	1,940	8,950	94,529
\$23,431 to \$39,050	72,835	6,890	1,650	690	90	1,330	10,340	93,825
\$39,051 to \$62,480	118,190	6,290	2,170	840	115	1,690	12,545	141,840
\$62,481 to \$78,100	75,040	2,740	1,070	330	55	763	6,045	86,043
Above \$78,100	299,785	5,910	4,605	935	135	2,420	11,560	325,350
Total	635,375	31,955	12,060	4,184	430	8,143	49,440	741,587

As seen in Table IV.60, the most common housing problem tends to be housing cost burdens. More than 97,795 households have a cost burden and 71,140 have a severe cost burden. Some 46,165 renter households are impacted by cost burdens, and 42,320 are impacted by severe cost burdens. On the other hand, some 51,630 owner-occupied households have cost burdens, and 28,820 have severe cost burdens.

There are a total of 51,630 owner-occupied and 46,165 renter-occupied households with a cost burden of greater than 30 percent and less than 50 percent. An additional 28,820 owner-occupied and 42,320 renter-occupied households had a cost burden greater than 50 percent of income. Overall, there are 541,850 households without a housing problem.

Table IV.59						
Percent of Housing Problems by Income and Tenure						
State of Nebraska						
2012–2016 HUD CHAS Data						
Housing Problem	\$0 to \$23,430	\$23,431 to \$39,050	\$39,051 to \$62,480	\$62,481 to \$78,100	Above \$78,100	Total
Owner-Occupied						
Lacking complete plumbing or kitchen facilities	16.5%	13.9%	19.8%	33.6%	44.7%	22.7%
Severely Overcrowded with > 1.51 people per room (and complete kitchen and plumbing)	6.9%	20.7%	27%	25%	47%	23.5%
Overcrowded - With 11-1.5 people per room (and none of the above problems)	17.4%	39.4%	46.9%	48.2%	64.1%	41.3%
Housing cost burden greater that 50% of income (and none of the above problems)	30.6%	55.5%	80.5%	82.9%	84.3%	40.5%
Housing cost burden greater than 30% of income (and none of the above problems)	38.4%	34.5%	63%	87.3%	94%	52.8%
Zero/negative income (and none of the above problems)	36.4%	0%	0%	0%	0%	36.4%
Has none of the 4 housing problems	36.9%	56.2%	56.4%	66.1%	85%	73.7%
Total	32.3%	46%	57.7%	67.6%	84.8%	66%
Renter-Occupied						
Lacking complete plumbing or kitchen facilities	83.5%	86.1%	80.2%	66.4%	55.3%	77.3%
Severely Overcrowded with > 1.51 people per room (and complete kitchen and plumbing)	93.1%	79.3%	73%	75%	53%	76.5%
Overcrowded - With 11-1.5 people per room (and none of the above problems)	82.6%	60.6%	53.1%	51.8%	35.9%	58.7%
Housing cost burden greater that 50% of income (and none of the above problems)	69.4%	44.5%	19.5%	17.1%	15.7%	59.5%
Housing cost burden greater than 30% of income (and none of the above problems)	61.6%	65.5%	37%	12.7%	6%	47.2%
Zero/negative income (and none of the above problems)	63.6%	0%	0%	0%	0%	63.6%
Has none of the 4 housing problems	63.1%	43.8%	43.6%	33.9%	15%	26.3%
Total	67.7%	54%	42.3%	32.4%	15.2%	34%

Table IV.60
Housing Problems by Income and Tenure

State of Nebraska
 2012–2016 HUD CHAS Data

Housing Problem	\$0 to \$23,430	\$23,431 to \$39,050	\$39,051 to \$62,480	\$62,481 to \$78,100	Above \$78,100	Total
Owner-Occupied						
Lacking complete plumbing or kitchen facilities	470	285	335	200	695	1,985
Severely Overcrowded with > 1.51 people per room (and complete kitchen and plumbing)	55	200	275	90	235	855
Overcrowded - With 11-1.5 people per room (and none of the above problems)	460	1,015	1,420	535	1,230	4,660
Housing cost burden greater than 50% of income (and none of the above problems)	15,300	7,800	4,015	875	830	28,820
Housing cost burden greater than 30% of income (and none of the above problems)	6,325	12,495	18,370	6,800	7,640	51,630
Zero/negative income (and none of the above problems)	2,595	0	0	0	0	2,595
Has none of the 4 housing problems	5,375	21,330	57,440	49,690	265,420	399,255
Total	30,580	43,125	81,855	58,190	276,050	489,800
Renter-Occupied						
Lacking complete plumbing or kitchen facilities	2,380	1,765	1,355	395	860	6,755
Severely Overcrowded with > 1.51 people per room (and complete kitchen and plumbing)	745	765	745	270	265	2,790
Overcrowded - With 11-1.5 people per room (and none of the above problems)	2,190	1,560	1,605	575	690	6,620
Housing cost burden greater than 50% of income (and none of the above problems)	34,750	6,260	975	180	155	42,320
Housing cost burden greater than 30% of income (and none of the above problems)	10,165	23,710	10,810	990	490	46,165
Zero/negative income (and none of the above problems)	4,530	0	0	0	0	4,530
Has none of the 4 housing problems	9,190	16,635	44,490	25,440	46,840	142,595
Total	63,950	50,695	59,980	27,850	49,300	251,775
Total						
Lacking complete plumbing or kitchen facilities	2,850	2,050	1,690	595	1,555	8,740
Severely Overcrowded with > 1.51 people per room (and complete kitchen and plumbing)	800	965	1,020	360	500	3,645
Overcrowded - With 11-1.5 people per room (and none of the above problems)	2,650	2,575	3,025	1,110	1,920	11,280
Housing cost burden greater than 50% of income (and none of the above problems)	50,050	14,060	4,990	1,055	985	71,140
Housing cost burden greater than 30% of income (and none of the above problems)	16,490	36,205	29,180	7,790	8,130	97,795
Zero/negative income (and none of the above problems)	7,125	0	0	0	0	7,125
Has none of the 4 housing problems	14,565	37,965	101,930	75,130	312,260	541,850
Total	94,530	93,820	141,835	86,040	325,350	741,575

Cost Burdens

For owner occupied housing, elderly non-family households are most likely to be impacted by housing cost burdens, with 31.5 percent of these households having a cost burden or severe cost burden. For lower income owner households, elderly non-family households and large families are most likely to experience cost burdens. Some 69.2 percent of elderly non-family and 81.9 percent of large family households below 30 percent HAMFI face cost burdens or severe cost burdens. These data are shown in Table IV.61

Table IV.61
Owner-Occupied Households by Income and Family Status and Cost Burden
 State of Nebraska
 2012–2016 HUD CHAS Data

Income	Elderly Family	Small Family	Large Family	Elderly Non-Family	Other Household	Total
Cost Burden						
\$0 to \$23,430	775	1,125	410	3,210	975	6,495
\$23,431 to \$39,050	2,180	3,660	1,490	3,785	1,945	13,060
\$39,051 to \$62,480	2,980	6,910	1,830	2,695	4,250	18,665
\$62,481 to \$78,100	1,040	3,000	645	735	1,435	6,855
Above \$78,100	1,495	3,960	535	430	1,295	7,715
Total	8,470	18,655	4,910	10,855	9,900	52,790
Severe Cost Burden						
\$0 to \$23,430	1,790	3,660	1,105	5,685	3,610	15,850
\$23,431 to \$39,050	1,190	2,225	680	2,185	1,720	8,000
\$39,051 to \$62,480	715	1,400	260	820	885	4,080
\$62,481 to \$78,100	175	430	90	60	125	880
Above \$78,100	215	435	65	65	50	830
Total	4,085	8,150	2,200	8,815	6,390	29,640
Total						
\$0 to \$23,430	3,640	5,810	1,850	12,845	6,440	30,585
\$23,431 to \$39,050	9,085	9,490	3,580	15,075	5,895	43,125
\$39,051 to \$62,480	19,515	26,145	8,015	14,655	13,525	81,855
\$62,481 to \$78,100	12,575	23,820	6,350	6,095	9,355	58,195
Above \$78,100	54,265	152,075	27,745	13,760	28,200	276,045
Total	99,080	217,340	47,540	62,430	63,415	489,805

Renter households are impacted at a higher rate by cost burdens than owner households. Some 95,633 renter occupied households faced cost burdens, compared to 16.8 percent of owner occupied households. Of these, there are 11,035 renter households with incomes less than 30 percent HAMFI facing a cost burden, and an additional 37,875 renter households with incomes below 30 percent HAMFI facing a severe cost burden.

Table IV.62
Renter-Occupied Households by Income and Family Status and Cost Burden

State of Nebraska
 2012–2016 HUD CHAS Data

Income	Elderly Family	Small Family	Large Family	Elderly Non-Family	Other Household	Total
Cost Burden						
\$0 to \$23,430	245	3,265	1,060	2,185	4,280	11,035
\$23,431 to \$39,050	835	9,095	1,740	3,330	10,140	25,140
\$39,051 to \$62,480	560	3,460	430	1,640	5,040	11,130
\$62,481 to \$78,100	75	345	50	160	375	1,005
Above \$78,100	170	90	35	300	25	620
Total	1,885	16,255	3,315	7,615	19,860	48,930
Severe Cost Burden						
\$0 to \$23,430	665	10,995	2,585	6,520	17,110	37,875
\$23,431 to \$39,050	250	1,665	310	2,070	2,645	6,940
\$39,051 to \$62,480	140	105	4	950	130	1,329
\$62,481 to \$78,100	40	15	4	145	50	254
Above \$78,100	20	0	0	275	10	305
Total	1,115	12,780	2,903	9,960	19,945	46,703
Total						
\$0 to \$23,430	1,225	17,240	4,395	13,180	27,910	63,950
\$23,431 to \$39,050	1,795	16,695	4,080	8,990	19,135	50,695
\$39,051 to \$62,480	2,485	20,725	4,174	6,440	26,155	59,979
\$62,481 to \$78,100	1,180	11,315	2,284	2,125	10,945	27,849
Above \$78,100	3,230	21,115	2,785	3,605	18,565	49,300
Total	9,915	87,090	17,718	34,340	102,710	251,773

ACCESS TO MORTGAGE FINANCE SERVICES

Congress enacted the Home Mortgage Disclosure Act in 1975, permanently authorizing the law in 1988¹³. 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;¹⁴
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 percent of the institution's total loan originations, or more than \$25 million;
3. The institution must have had a home or branch office in an MSA or have received applications for, originated, or purchased five or more home purchase loans, home improvement loans, or refinancing 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 the best and most complete set of information on home loan applications. This report includes HMDA data from 2008 through 2018, the most recent year for which these data are available.

¹³ Prior to that year, Congress had to periodically reauthorize the law.

¹⁴ Each December, the Federal Reserve announces the threshold for the following year. The asset threshold may change from year to year based on changes in the Consumer Price Index for Urban Wage Earners and Clerical Workers.

Table IV.63 shows the purpose of loan by year for the State of Nebraska from 2008 to 2018. As seen therein, there were over 992,321 loans during this time period, of these some 392,346 were for home purchases. In 2018, there were 75,769 loans, of which 43,120 were for home purchases.

Purpose	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
Home Purchase	32,024	33,584	28,117	27,109	31,124	35,740	35,678	41,331	42,231	42,288	43,120	392,346
Home Improvement	9,683	7,440	6,026	5,667	6,232	6,641	6,491	7,299	7,380	6,894	4,882	74,635
Refinancing	45,588	75,080	69,920	56,900	75,477	53,916	24,989	32,606	38,365	24,732	21,605	519,178
Total	87,295	116,104	104,063	89,676	112,833	96,297	67,158	81,236	87,976	73,914	75,769	992,321

Table IV.64 shows the occupancy status for loan applicants. A vast majority of applicants were or owner-occupied units, accounting for 92.7 percent between 2008 and 2018, and for 92.3 percent in 2018 alone.

Status	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
Owner-Occupied	80,987	110,918	98,687	83,418	104,533	87,971	60,454	74,557	81,155	67,525	69,948	920,153
Not Owner-Occupied	6,192	4,869	5,262	6,163	8,184	8,129	6,538	6,643	6,715	6,313	792	65,800
Not Applicable	116	317	114	95	116	197	166	36	106	76	5,029	6,368
Total	87,295	116,104	104,063	89,676	112,833	96,297	67,158	81,236	87,976	73,914	75,769	992,321

Owner-occupied home purchase loan applications by loan types are shown in Table IV. 65. Between 2008 and 2018, some 67.5 percent of home loan purchases were conventional loans, 29.1 percent were FHA insured, and 10.5 percent were VA Guaranteed, and 5 percent were Rural Housing Service or Farm Service Agency.

Loan Type	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
Conventional	17,659	12,695	10,649	11,287	14,218	18,716	19,654	21,913	22,494	23,882	26,834	200,001
FHA - Insured	8,463	14,611	11,891	9,399	9,566	8,898	7,389	9,812	9,766	8,342	6,750	104,887
VA - Guaranteed	2,242	2,880	2,479	2,484	2,789	3,395	3,615	4,324	4,655	4,570	4,397	37,830
Rural Housing Service or Farm Service Agency	1,093	1,564	1,129	1,606	1,725	1,767	1,793	1,840	1,743	1,863	1,780	17,903
Total	29,457	31,750	26,148	24,776	28,298	32,776	32,451	37,889	38,658	38,657	39,761	360,621

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.66, just over 210,766 home purchase loan applications were originated over the 2008-2018 period, and 22,095 were denied.

Action	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
Loan Originated	16,883	18,609	14,890	13,634	16,205	18,418	19,156	22,511	23,087	22,867	24,506	210,766
Application Approved but not Accepted	1,183	829	725	614	715	800	659	806	736	588	510	8,165
Application Denied	1,957	2,031	1,663	1,535	1,934	2,298	2,173	2,276	2,288	1,905	2,035	22,095
Application Withdrawn by Applicant	1,082	1,280	1,183	982	1,238	1,552	1,639	2,004	2,706	2,726	3,242	19,634
File Closed for Incompleteness	261	198	200	212	134	191	190	169	188	180	251	2,174
Loan Purchased by the Institution	8,090	8,798	7,486	7,799	8,070	9,516	8,634	10,122	9,653	10,389	9,173	97,730
Preapproval Request Denied	1	5	1	0	1	1	0	1	0	2	15	27
Preapproval Approved but not Accepted	0	0	0	0	1	0	0	0	0	0	29	30
Total	29,457	31,750	26,148	24,776	28,298	32,776	32,451	37,889	38,658	38,657	39,761	360,621

The most common reasons cited in the decision to deny one of these loan applications related to the credit history of the prospective homeowner, as shown in Table IV.67. Debt-to-income ratio and collateral were also commonly given as reasons to deny home purchase loans.

Denial Reason	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
Debt-to-Income Ratio	306	365	276	235	307	431	347	368	413	318	589	3,955
Employment History	39	71	54	50	58	67	44	85	74	60	63	665
Credit History	442	417	353	315	339	389	352	334	361	240	425	3,967
Collateral	232	233	198	182	174	188	215	230	192	224	268	2,336
Insufficient Cash	58	46	47	51	67	74	66	51	75	79	114	728
Unverifiable Information	56	52	39	42	51	64	63	73	74	58	70	642
Credit Application Incomplete	121	94	57	64	89	103	140	130	119	134	197	1,248
Mortgage Insurance Denied	8	17	10	4	3	1	2	5	3	2	4	59
Other	137	104	107	71	83	121	79	123	90	107	160	1,182
Missing	558	632	522	521	763	860	865	877	887	683	145	7,313
Total	1,957	2,031	1,663	1,535	1,934	2,298	2,173	2,276	2,288	1,905	2,035	22,095

Denial rates were observed to differ by race and ethnicity, as shown in Table IV.68. While white applicants had a denial rate of 8.9 percent over the period from 2008 through 2018, black applicants had a denial rate of 15 percent. American Indian and Pacific Islander applicants also had a denial rate higher than the average, at 14.5 percent and 13.2 percent, respectively. As for ethnicity, Hispanic applicants had a higher denial rate than non-Hispanic applicants, at 15.1 percent versus 8.7 percent.

Table IV.68
Denial Rates by Race/Ethnicity of Applicant
 State of Nebraska
 2004–2017 HMDA Data

Race/Ethnicity	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Average
American Indian	10.1%	12.8%	14.9%	14.3%	16.3%	17.1%	20.8%	9.7%	15.6%	13.3%	15.7%	14.5%
Asian	9%	10.4%	10%	9.6%	11.5%	11.8%	9.8%	9.2%	7.7%	6.1%	7%	8.9%
Black	15.6%	15.2%	15.7%	15.1%	16.4%	15.8%	15.6%	15.6%	16.2%	13%	12.9%	15%
Pacific Islander	16.7%	7.1%	17.1%	8.7%	16.7%	19.4%	12.9%	16.4%	11.5%	9.8%	9.3%	13.2%
White	9.8%	9.4%	9.5%	9.6%	10.2%	10.7%	9.6%	8.5%	8.3%	7%	7%	8.9%
Not Available	17.2%	13.7%	16.2%	16.3%	15.6%	15.2%	16.5%	16%	16.4%	14.7%	12.5%	15.3%
Not Applicable	12.5%	20%	0%	14.3%	0%	0%	14.3%	11.1%	0%	0%	0%	5.2%
Average	10.4%	9.8%	10%	10.1%	10.7%	11.1%	10.2%	9.2%	9%	7.7%	7.7%	9.5%
Hispanic	16.4%	15.8%	16%	19.6%	19.5%	20.1%	16.5%	14.6%	14.1%	11.9%	10.7%	15.1%
Non-Hispanic	9.5%	9.2%	9.3%	9.2%	9.8%	10.2%	9.4%	8.4%	8.1%	6.9%	6.9%	8.7%

Predatory Lending

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

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 (APR) loans (HALs), defined as more than three percentage points higher than comparable treasury rates for home purchase loans, or five percentage points higher for refinance loans.

Home loans are designated as "high-annual percentage rate" loans (HALs) where the annual percentage rate on the loan exceeds that of a comparable treasury instruments by at least three percentage points. As shown in Table I.V.69, some 3,421 loans between 2008 and 2018 were HALs, accounting for 1.6 percent. The highest rate of HAL loans was seen in 2008, at 9.8 percent, which fell to 0.2 percent in 2017.

Table IV.69
Originated Owner-Occupied Loans by HAL Status
 State of Nebraska
 2008–2018 HMDA Data

Loan Type	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
HAL	1,650	1,068	117	96	90	61	78	65	69	47	80	3,421
Other	15,233	17,541	14,773	13,538	16,115	18,357	19,078	22,446	23,018	22,820	24,437	207,356
Total	16,883	18,609	14,890	13,634	16,205	18,418	19,156	22,511	23,087	22,867	24,506	210,766
Percent HAL	9.8%	5.7%	0.8%	0.7%	0.6%	0.3%	0.4%	0.3%	0.3%	0.2%	0.3%	1.6%

F. PUBLICLY SUPPORTED HOUSING ANALYSIS

There are a variety of types and locations of public housing units within the State of Nebraska. According to HUD's AFFH data, there are 27,354 total publicly supported units in the State of Nebraska. Of these, some 7,351 are public housing units, 6,358 are Project Based Section 8, and 910 are other HUD Multifamily. There are 12,735 Housing Choice Vouchers.

Program	Total Units	Total Disabled Units
Public Housing	7,351	1,960
Project Based Section 8	6,358	1,733
Other HUD Multifamily	910	255
Housing Choice Vouchers	12,735	2,881
Total	27,354	6,829

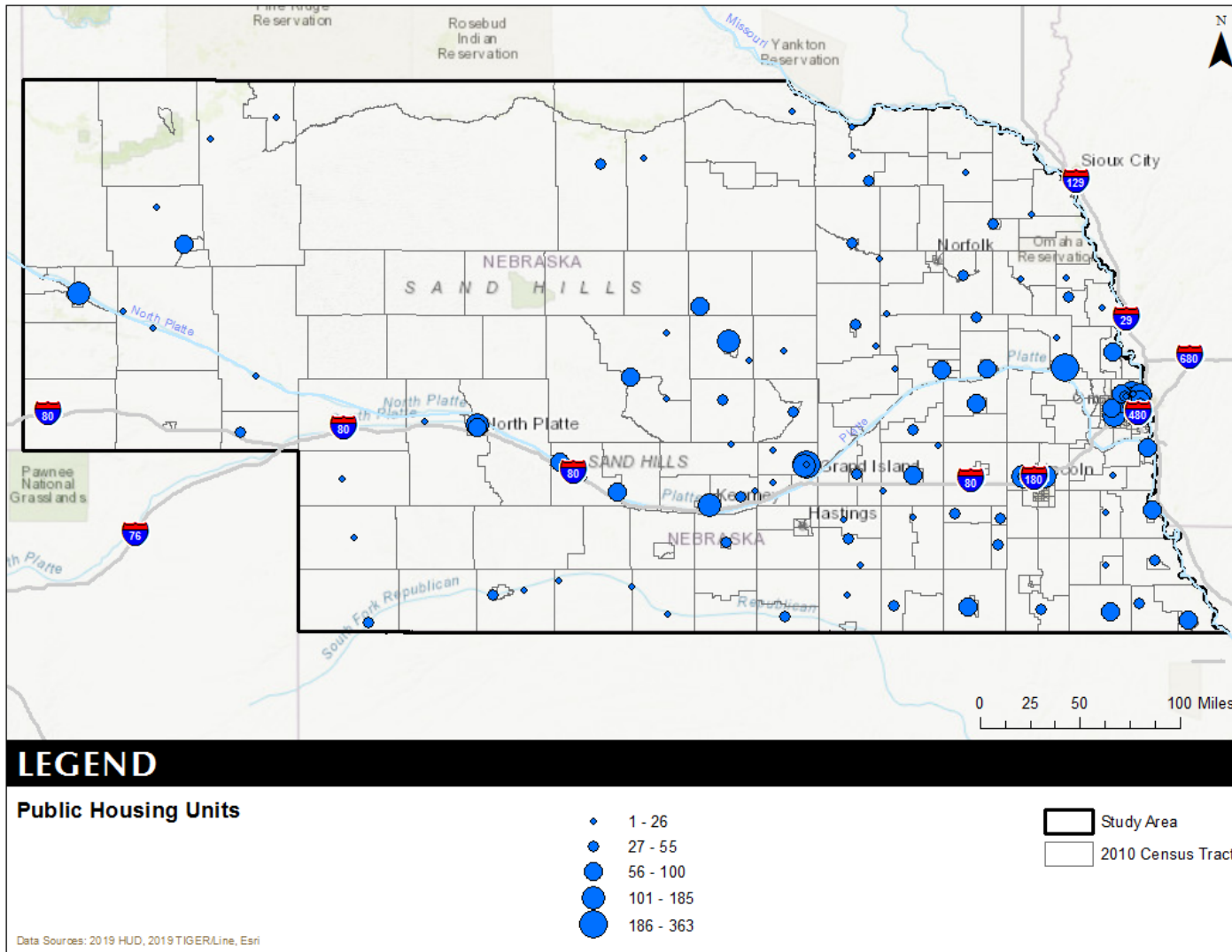
Map IV.12 shows public housing units in the State of Nebraska. Map IV.13 shows housing choice vouchers. Low Income Housing Tax Credit (LIHTC) units are shown in Map IV.14 and Map IV.15 shows other assisted multi-family housing units in the State.

Disparities in Access to Opportunity

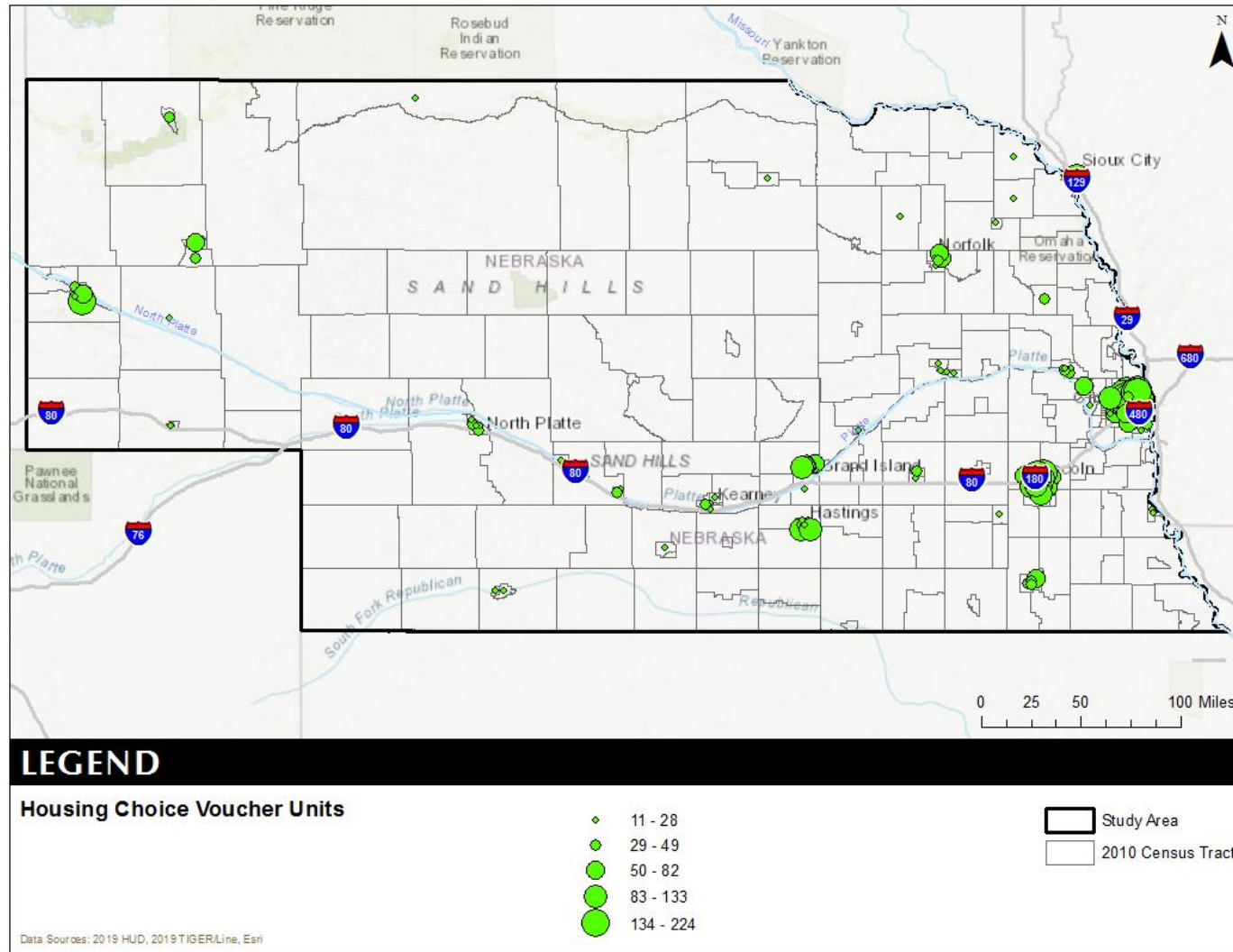
The locations of publicly supported housing units are in areas with both high and low access to opportunity. There does not appear to be a concentration of publicly supported housing units in the State.

Map IV.12 Public Housing Units

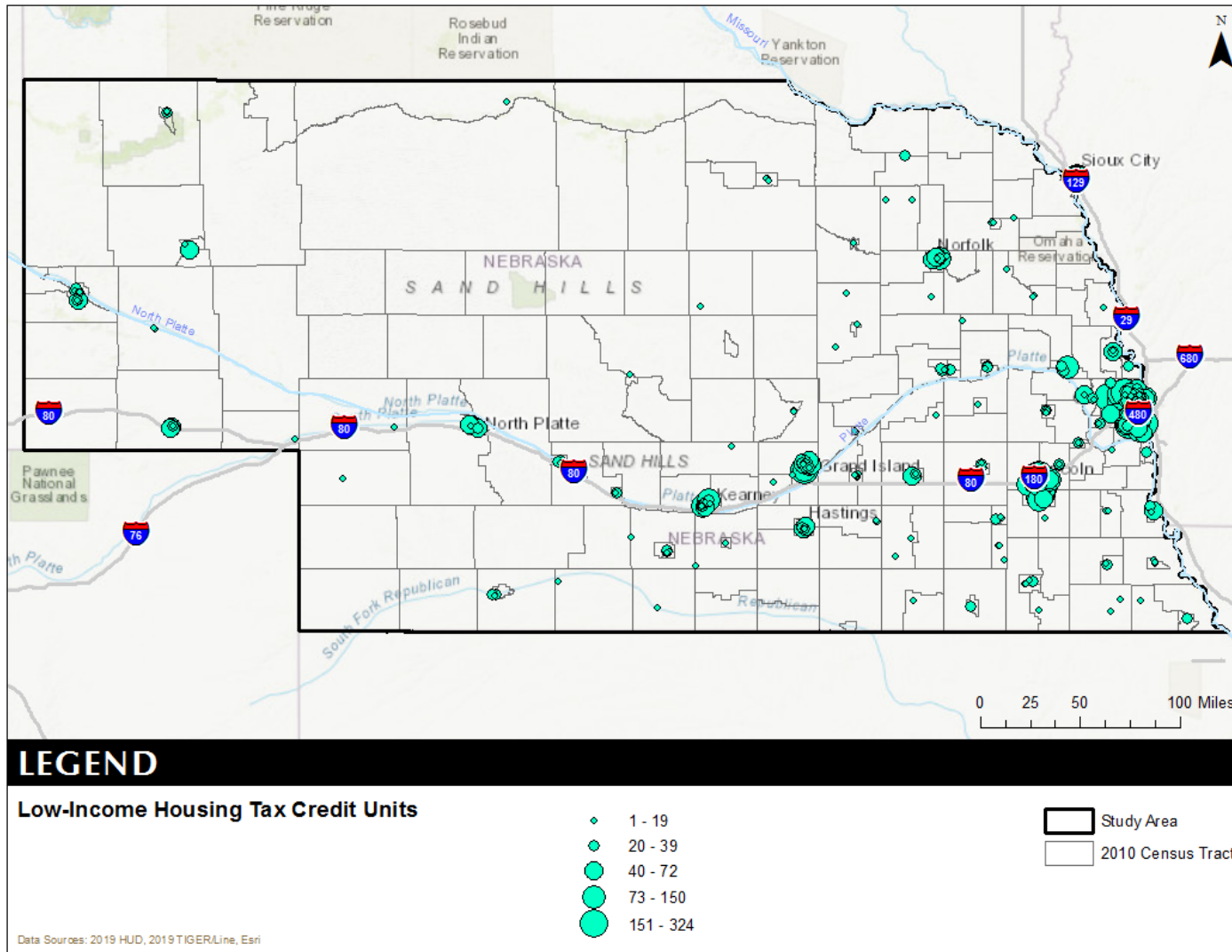
State of Nebraska
2018 ACS, 2017 Tigerline, HUD AFFH Tool



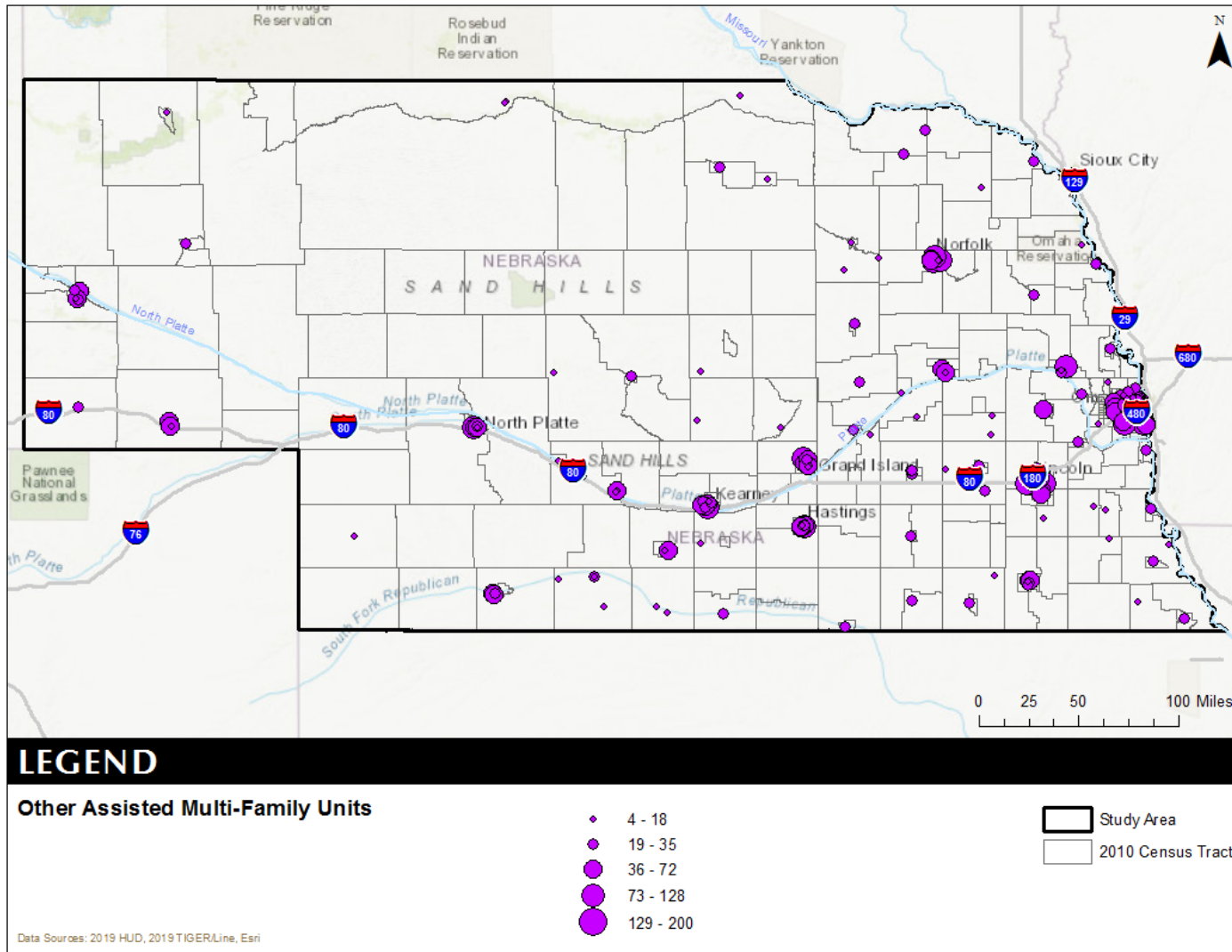
Map IV.13
Housing Choice Voucher Units
State of Nebraska
2018 ACS, 2017 Tigerline, HUD AFFH Tool



Map IV.14
Low Income Housing Tax Credit (LIHTC) Units
State of Nebraska
2018 ACS, 2017 Tigerline, HUD AFFH Tool



Map IV.15
Other HUD Multi-Family Units
State of Nebraska
2018 ACS, 2017 Tigerline, HUD AFFH Tool



G. DISABILITY AND ACCESS ANALYSIS

Section 503 of the Rehabilitation Act of 1973 prohibits discrimination based on disability in any program or activity receiving federal assistance.¹⁵ Title II of the Americans with Disabilities Act of 1990 prohibits discrimination based on disability by public entities. HUD enforces the housing-related activities of public entities, including public housing, housing assistance, and housing referrals.¹⁶

Persons with Disabilities

Disability by age, as estimated by the 2018 ACS, is shown in Table IV.71, below. The disability rate for females was 11.3 percent, compared to 11.8 percent for males. The disability rate grew precipitously higher with age, with 47.4 percent 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	458	0.7%	527	0.8%	985	0.7%
5 to 17	10,730	6.2%	6,250	3.8%	16,980	5.0%
18 to 34	14,073	6.4%	11,674	5.4%	25,747	5.9%
35 to 64	40,457	11.7%	38,856	11.2%	79,313	11.4%
65 to 74	20,742	27.5%	17,250	21.0%	37,992	24.1%
75 or Older	23,575	48.7%	31,816	46.6%	55,391	47.4%
Total	110,035	11.8%	106,373	11.3%	216,408	11.5%

The number of disabilities by type, as estimated by the 2018 ACS, is shown in Table IV.72. Some 5.9 percent have an ambulatory disability, 4.5 have an independent living disability, and 1.9 percent have a self-care disability.

Disability Type	Population with Disability	Percent with Disability
Hearing disability	73,092	3.9%
Vision disability	38,231	2.0%
Cognitive disability	75,323	4.3%
Ambulatory disability	102,016	5.9%
Self-Care disability	33,888	1.9%
Independent living disability	63,730	4.5%

¹⁵ 29 U.S.C. §§794

¹⁶ 42 U.S.C. §§ 12131 – 12165

Housing Accessibility

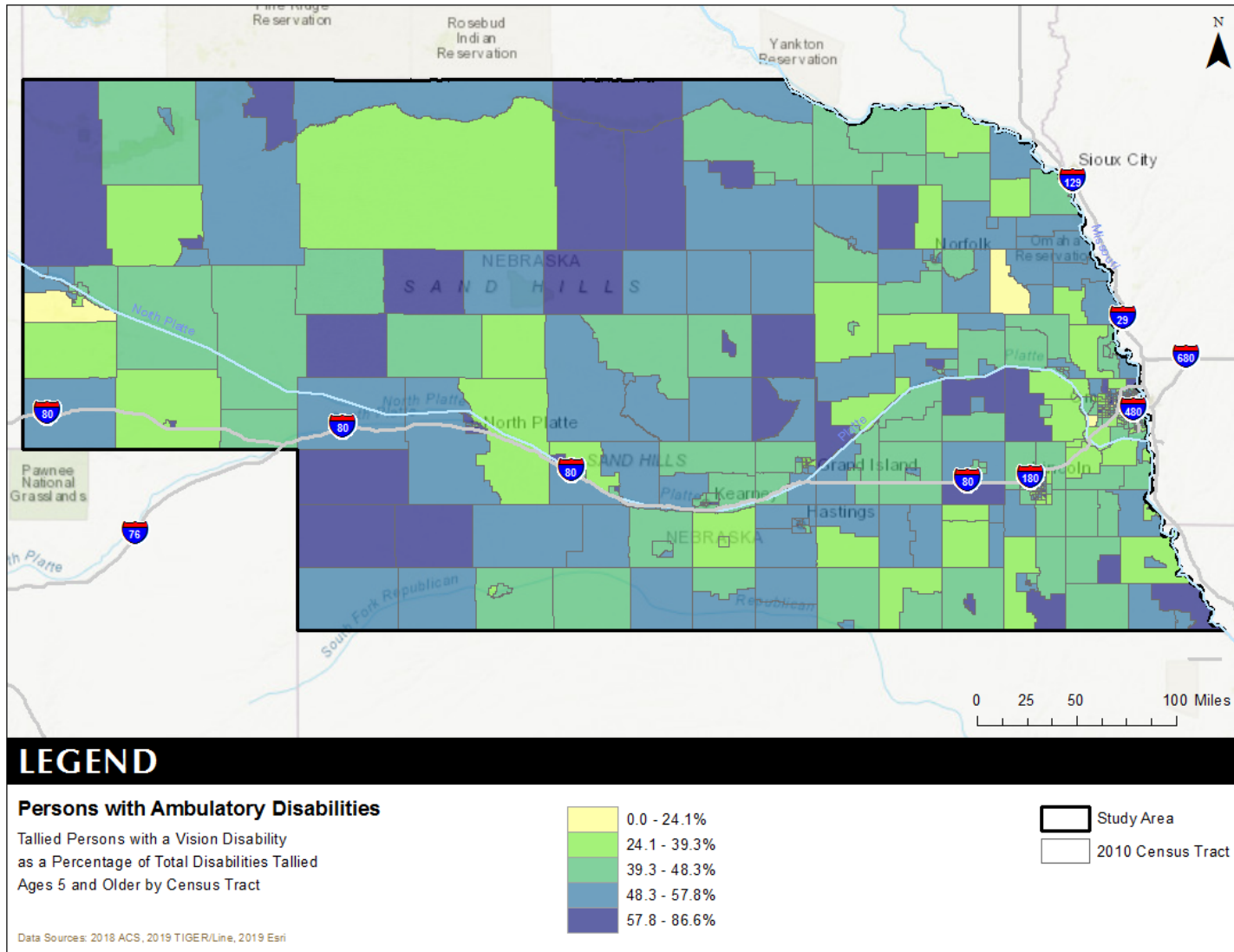
Accessible housing units are located throughout the State. However, many newer housing units are located outside city center areas. These newer housing units are more likely to have the mandatory minimum accessibility features.

Some 25 percent of publicly supported housing units, according to HUD's AFFH database, are accessible. This exceeds the rate of disability for the general population in the State. However, with the aging population, and the rate of disabilities for persons utilizing publicly supported housing, this may not meet the needs of current and future residents with disabilities.

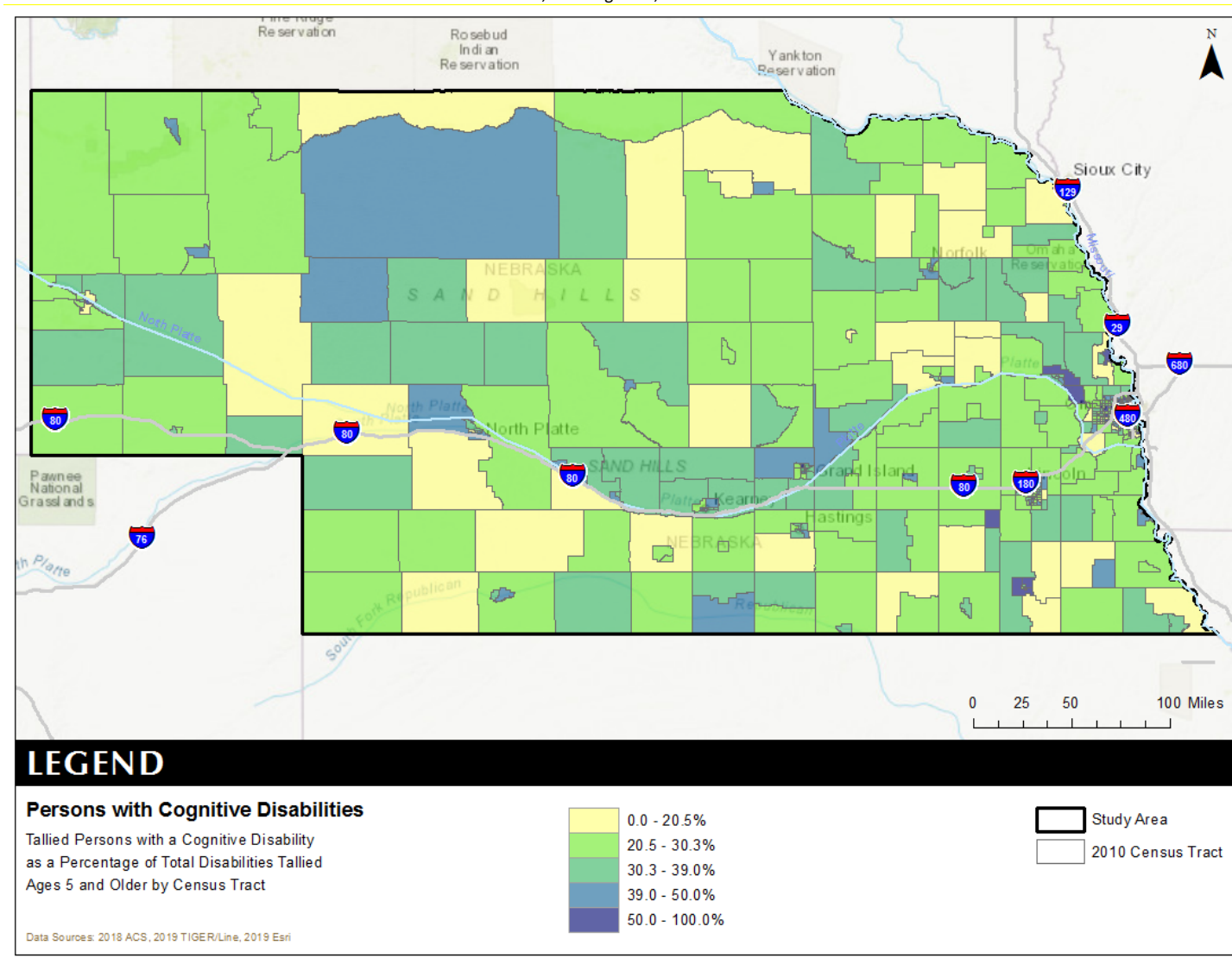
Table IV.73 Residents with Disabilities by Subsidized Housing Type State of Nebraska HUD AFFH Raw Database		
Program	Total Units	Total Disabled Units
Public Housing	7,351	1,960
Project Based Section 8	6,358	1,733
Other HUD Multifamily	910	255
Housing Choice Vouchers	12,735	2,881
Total	27,354	6,829

The Maps on the following pages show the distribution of households with various disabilities. There does not appear to be a concentration of households by disability type in any one area of the State.

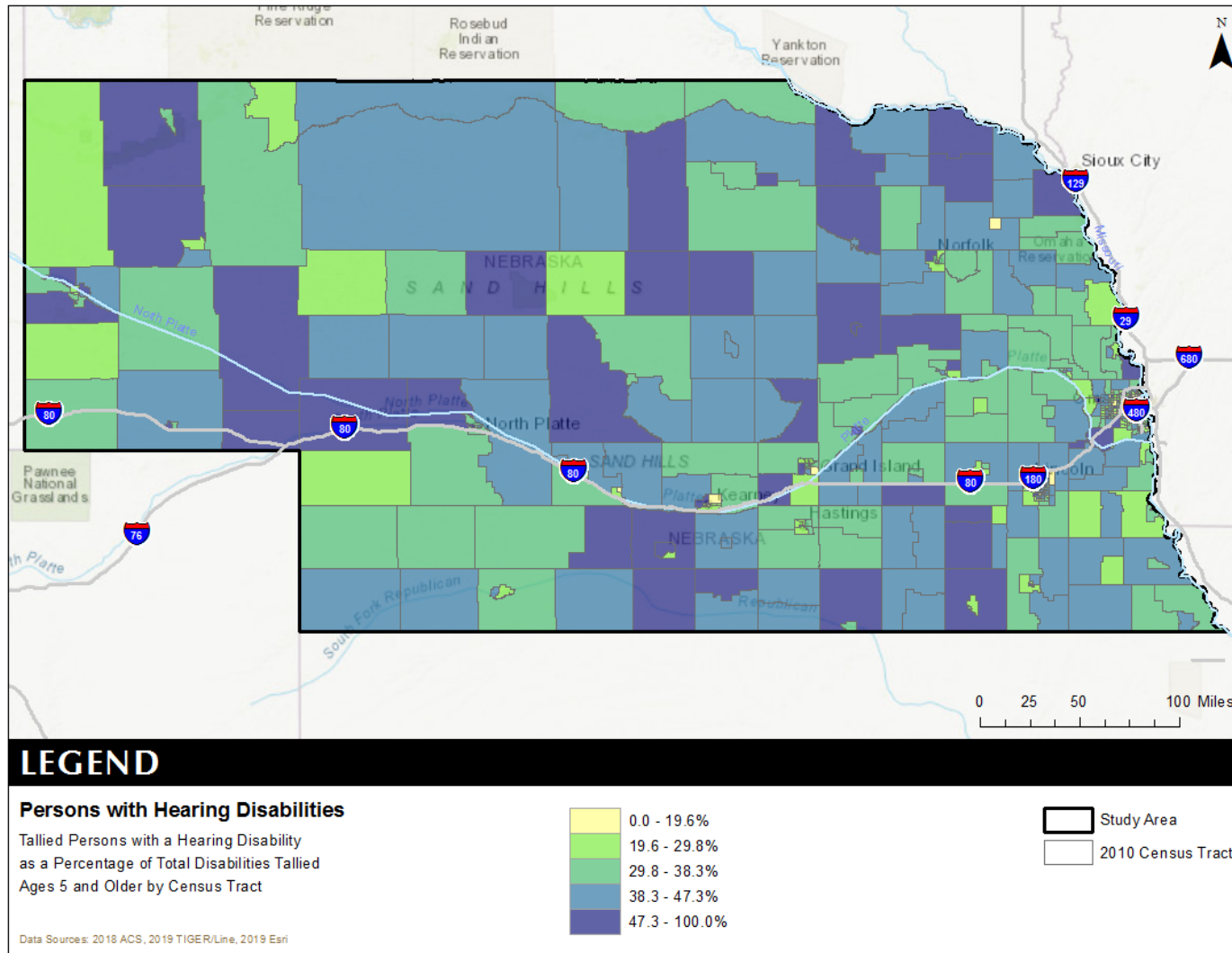
Map IV.16
Persons with Ambulatory Disabilities
 State of Nebraska
 2018 ACS, 2019 Tigerline, HUD AFFH Tool



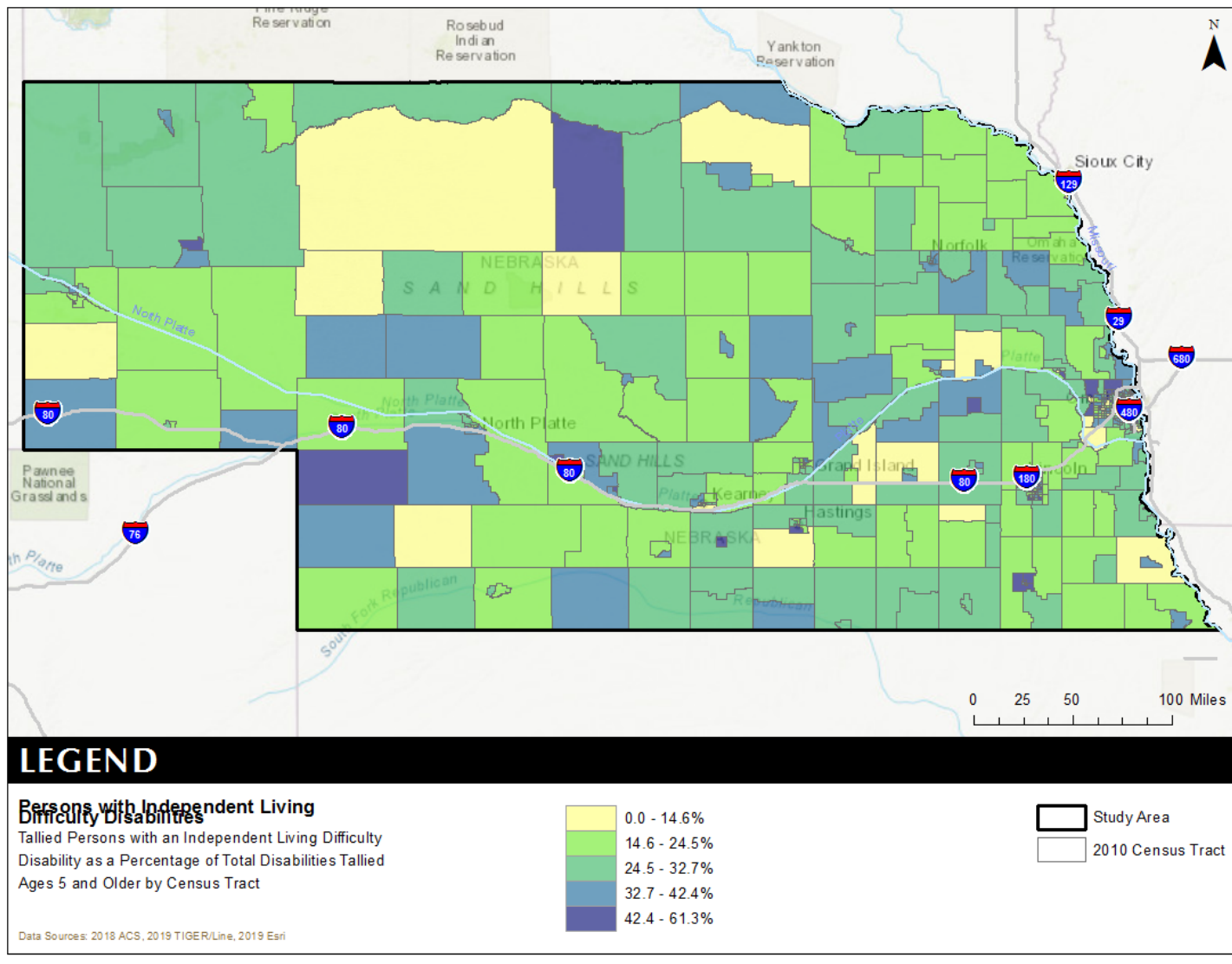
Map IV.17
Persons with Cognitive Disabilities
 State of Nebraska
 2018 ACS, 2019 Tigerline, HUD AFFH Tool



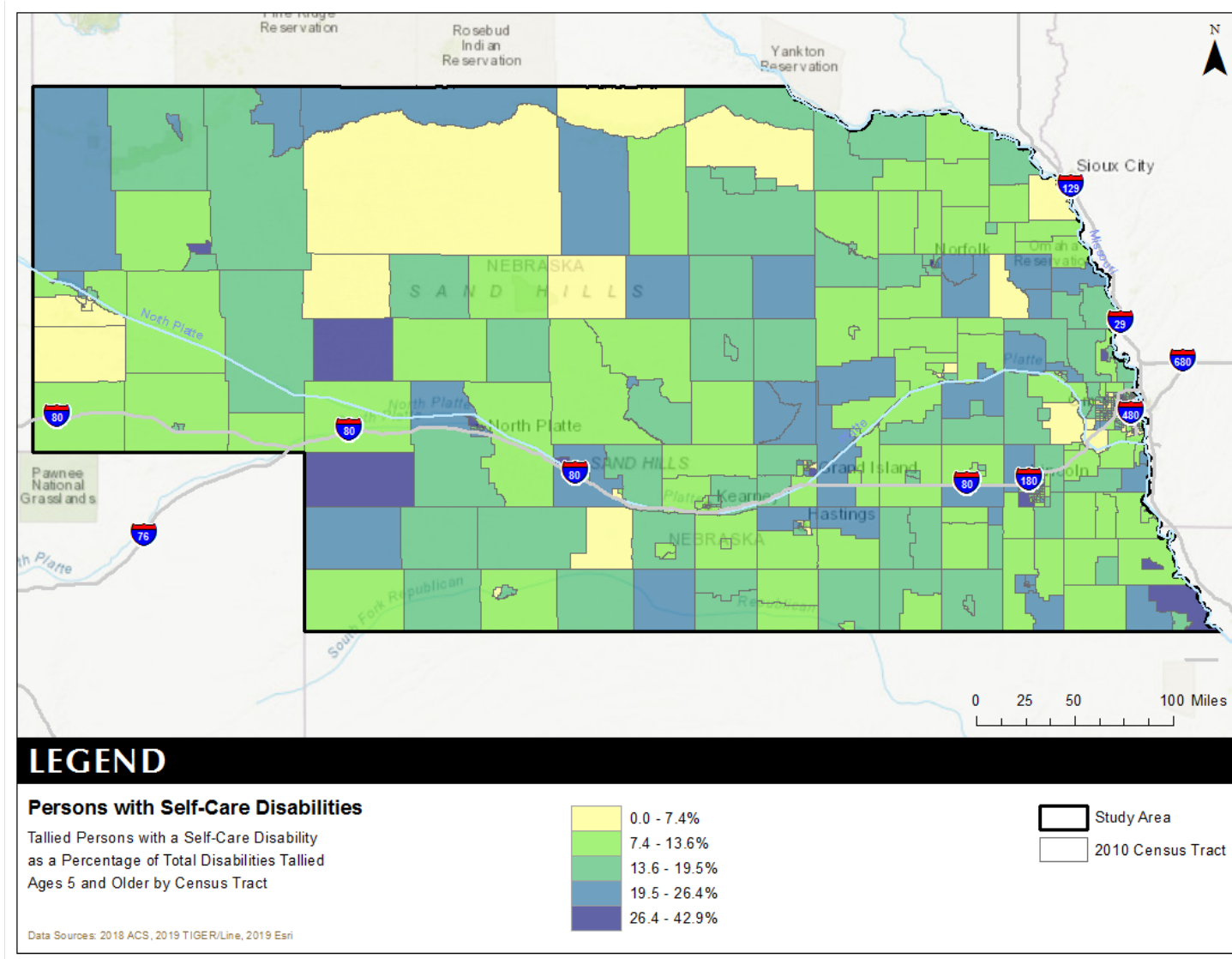
Map IV.18
Persons with Hearing Disabilities
 State of Nebraska
 2018 ACS, 2019 Tigerline, HUD AFFH Tool



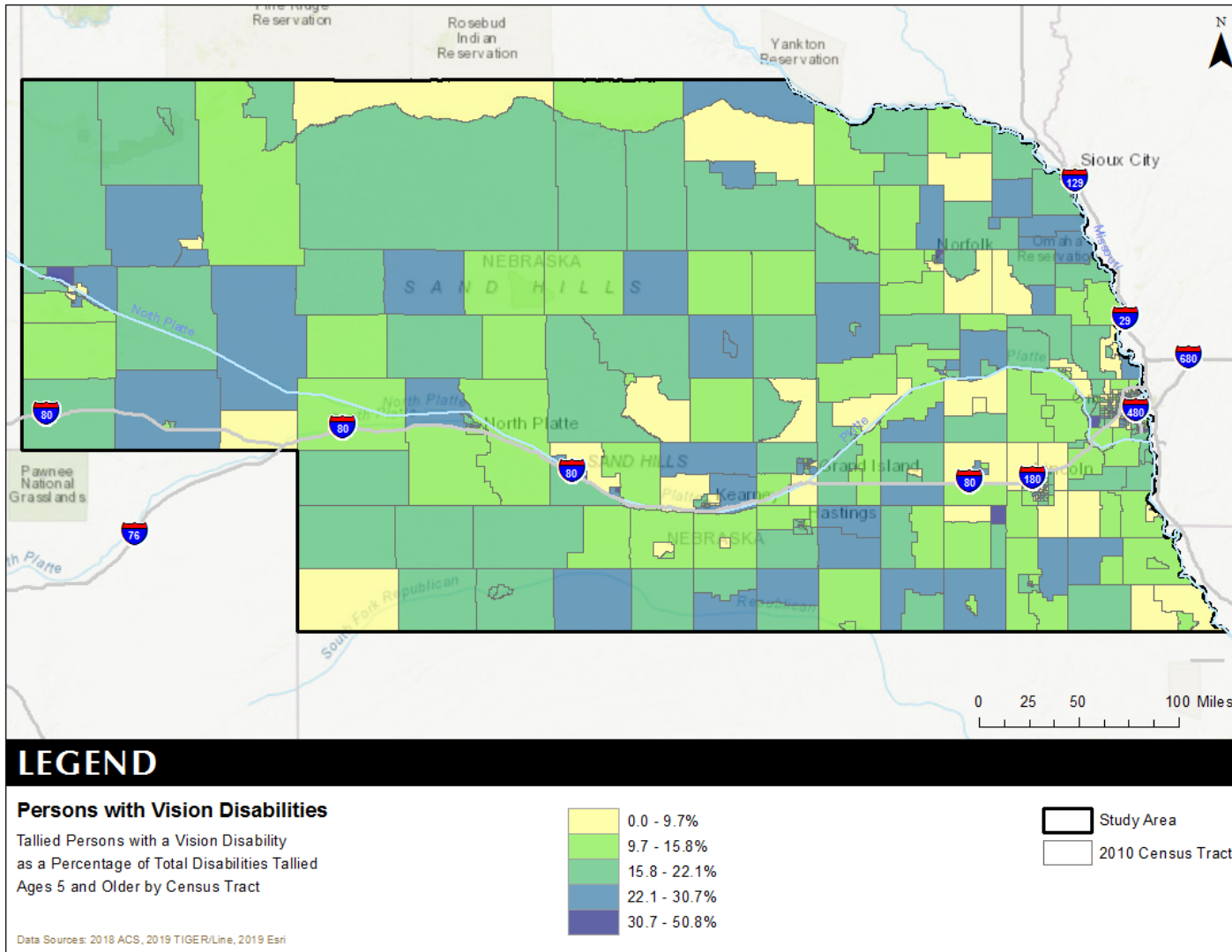
Map IV.19
Persons with Independent Living Disabilities
 State of Nebraska
 2018 ACS, 2019 Tigerline, HUD AFFH Tool



Map IV.20
Persons with Self Care Disabilities
 State of Nebraska
 2018 ACS, 2019 Tigerline, HUD AFFH Tool



Map IV.21
Persons with Vision Disabilities
 State of Nebraska
 2018 ACS, 2019 Tigerline, HUD AFFH Tool



H. FAIR HOUSING ENFORCEMENT, OUTREACH CAPACITY, & RESOURCES

FEDERAL FAIR HOUSING LAWS

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

Title VIII of the Civil Rights Act of 1968 (Fair Housing Act)¹⁷

The Fair Housing Act prohibits discrimination in the sale, rental, financing, and insuring of housing on the basis of race, color, religion, sex, and national origin. In 1988, the act was amended to include family status and disability as protected classes, which includes children under the age of 18 living with parents or legal custodians, pregnant women, and persons securing custody of children under the age of 18. Jurisdictions may add protected classes but are not allowed to subtract from the seven federally protected classes.¹⁸ The Act also contains design and construction accessibility provisions for certain new multi-family dwellings developed for first occupancy on or after March 13, 1991.¹⁹ On April 30, 2013, HUD and the Department of Justice released a Joint Statement that provides guidance regarding the persons, entities, and types of housing and related facilities that are subject to the accessible design and construction requirements of the Act.

It is unlawful under the Act to discriminate against a person in a protected class by: Refusing to sell or rent after the making of a bona fide offer, or to refuse to negotiate for the sale or rental of, or otherwise make unavailable or deny, a dwelling to any person because of race, color, religion, sex, familial status, or national origin; discriminating against any person in the terms, conditions, or privileges of sale or rental of a dwelling, or in the provision of services or facilities based on a protected class; representing that a dwelling is not available for inspection, sale, or rental when it is, in fact, available; publishing an advertisement indicating any preference, limitation, or discrimination against a protected class; or refusing to allow a person with a disability to make a reasonable modification to the unit at the renter's own expense.

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

The following are examples of Fair Housing Act violations:

¹⁷ 42 U.S.C. 3601, et. Seq., as amended in 1988

¹⁸ "HUD Fair Housing Laws and Presidential Executive Orders."

http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/FHLaws

¹⁹ "Title VIII: Fair Housing and Equal Opportunity."

http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/progdesc/title8

1. Making any representation, directly or implicitly, that the presence of anyone in a protected class in a neighborhood or apartment complex may or will have the effect of lowering property taxes, reduce safety, make the neighborhood and/or schools worse, change the character of the neighborhood, or change the ability to sell a home.
2. Providing inconsistent, lesser, or unequal service to customers or clients who are members of a protected class, such as failing to return calls from a buyer agent to avoid presenting a contract to your seller, avoiding or delaying an appointment for a showing a listing, making keys unavailable, failing to keep appointments, or refusing maintenance or repairs to an apartment.
3. Requiring higher standards for a member of a protected class, including asking for more references or demanding a higher credit rating.
4. Requiring employers to make distinctions on applications, or in the application process, among protected class members, including marking applications to indicate race, sex, etc. of applicant or misrepresenting availability for particular protected classes.
5. Advertising in a manner that indicates a preference for a particular class and thereby excluding protected class members.

Title VI of the Civil Rights Act of 1964

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

Section 504 of the Rehabilitation Act of 1973

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

Section 109 of the Housing and Community Development Act of 1974

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

Title II of the Americans with Disabilities Act of 1990

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

Architectural Barriers Act of 1968

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

Age Discrimination Act of 1975

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

Title IX of the Education Amendments Act of 1972

Title IX prohibits discrimination on the basis of sex or blindness in education programs or activities that receive federal financial assistance.²⁰

The Home Mortgage Disclosure Act (HMDA)

HMDA requires both depository and non-depository lenders to collect and publicly disclose information about housing-related applications and loans, including the race, ethnicity, sex, loan amount, and income of mortgage applicants and borrowers by Census tract. Depository institutions that meet the following criteria are required to report:

- Bank, credit union, or savings association
- Total assets must exceed the coverage threshold²¹
- The institution must have had a home or branch office in a Metropolitan Statistical Area (MSA)
- The institution must have originated or refinanced at least one home purchase loan secured by a first lien on a one- to four-family dwelling
- The institution must be federally insured or regulated
- The mortgage loan must have been insured, guaranteed, or supplemented by a federal agency or intended for sale to Fannie Mae or Freddie Mac

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

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

²⁰ HUD Fair Housing Laws and Presidential Executive Orders."

²¹ 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.

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)
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

EXECUTIVE ORDERS

Executive Order 11063 Equal Opportunity in Housing

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

Executive Order 12892 Leadership and Coordination of Fair Housing in Federal Programs: Affirmatively Furthering Fair Housing

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

Executive Order 12898 Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations

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

Executive Order 13166 Improving Access to Services for Persons with Limited English Proficiency

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

Executive Order 13217 Community Based Alternatives for Individuals with Disabilities

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

STATE FAIR HOUSING LAWS AND RESOURCES

The Nebraska Fair Housing Law prohibits discrimination in housing. Discrimination in housing on the basis of race, color, national origin, religion, sex, disability or familial status is prohibited in Nebraska. Covered entities generally include residential property owners, property managers, realtors and multiple listing services. However, exemptions exist for dwellings owned or operated by religious organization and bona fide private clubs for non-commercial purposes, housing for older persons, and owner-occupied private homes in which no more than three sleeping rooms are rented.²²

STATE AGENCIES

NEBRASKA EQUAL OPPORTUNITY COMMISSION

The Nebraska Equal Opportunity Commission (NEOC) is a neutral administrative agency created by statute in 1965 to enforce the public policy of the state against discrimination. The principal function of the NEOC is to receive, investigate, and pass upon charges of unlawful discrimination occurring anywhere within the State of Nebraska in the areas of employment, housing, and public accommodations.²³

While the NEOC does address discrimination for housing, its vision statement is broad and aims to eliminate any and all unlawful discriminatory practices in the state. Along with the Nebraska Fair Housing Act, the NEOC enforces the Nebraska Fair Employment Practice Act, Nebraska Age Discrimination in Employment Act, Equal Pay Act, and the Act Providing Equal Enjoyment of Public Accommodations. The powers and duties of the NEOC can be summarized as follows:

- “To receive, investigate, and pass upon charges of unlawful employment (housing, public accommodations) practices anywhere in the State;
- To hold hearings, subpoena witnesses, take sworn testimony and require the production of documents related to discrimination;
- To cooperate with the federal government and local human rights agencies;
- To attempt to eliminate unlawful employment, housing, and public accommodation practices by means of conference, conciliation, and persuasion; and
- To require that every employer, employment agency, and labor organization, subject to its jurisdiction, make and keep such records relevant to the determination of whether unlawful employment practices have been or are being committed.”²⁴

The contact information for the main office in Lincoln, Omaha, and Scottsbluff are presented below.

²² <https://neoc.nebraska.gov/laws/laws.html>

²³ NEOC, <http://www.neoc.ne.gov>

²⁴ NEOC, <https://neoc.nebraska.gov/about/about.html>

Main Office**Nebraska State Office Building**

301 Centennial Mall South, 5th Floor
PO Box 94934
Lincoln, NE 68509-4934
Telephone: (402) 471-2024
Toll Free: (800) 642-6112
Fax: (402) 471-4059

Omaha**State Office Building**

1313 Farnam-on-the-Mall, Suite 318
Omaha, NE 68102-1836
Telephone: (402) 595-2028
Toll Free: (800) 382-7820
Fax: (402) 595-1205

Scottsbluff**Panhandle State Office Complex**

505A Broadway, Suite 600
Scottsbluff, NE 69361-3515
Telephone: (308) 632-1340
Toll Free: (800) 830-8633
Fax: (308) 632-1341

FAMILY HOUSING ADVISORY SERVICES, INC.

Family Housing Advisory Services, Inc., (FHAS) has helped people secure and maintain decent, safe, and affordable housing and strengthened its communities through education, counseling, advocacy, and dispute resolution since 1968. The organization currently serves over 10,000 individuals and families in eastern Nebraska and western Iowa annually from its offices in Omaha and Council Bluffs. The Fair Housing Center of Nebraska-Iowa (FHC), a program of FHAS, provides services to housing consumers and providers, including educational services regarding the following:

- Fair housing laws and their purpose,
- What constitutes fair housing discrimination, and
- How to file a complaint.²⁵

Furthermore, the FHC offers professional training services, mediation, conciliation of fair housing disputes, and assistance with reasonable modification and accommodation requests as well as a testing program and investigative services to help establish evidence that can be used by HUD, the NEOC, and the courts to determine the presence of discriminatory housing practices. The contact information for the FHC and the central office is provided below.

²⁵ FHAS, <http://www.fhasinc.org/default.aspx>

The Fair Housing Center of Nebraska-Iowa

2505 North 24th Street, Suite 219
Omaha, NE 68110
(402) 934-6675
<http://www.fhasinc.org/>

Central Office

2401 Lake Street
Omaha, NE 68111
Phone: (402) 934-7921
Fax: (402) 934-7928

HIGH PLAINS COMMUNITY DEVELOPMENT CORPORATION, INC.

The High Plains Community Development Corporation (High Plains CDC)'s Fair Housing Program provides outreach and education on federal and state fair housing laws. Educational presentations are provided to the general public and to specific groups responsible for providing housing. Fair housing information and rental counseling is available for renters, landlords, and the general public.²⁶

High Plains Community Development Corporation

803 East 3rd Street Suite 4
Chadron, NE 69337
Phone: 308-432-4346
Fax: 308-432-4655

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 Department of Justice may take legal action to enforce the law.

Requests for Fair Housing Complaint Data were sent to the Department of Housing and Urban Development (HUD), the Center for Fair Housing, Central Nebraska Fair Housing Center, and the Fair Housing Center of Northern Nebraska in September, 2019. These requests were followed up with additional requests in December, 2019 and January, 2020. At the date of this document, only HUD Fair Housing Complaint Data has been received.

²⁶ http://www.highplainscdc.com/fair_housing.html

As shown in Table IV.74, below, disability was the perceived basis for discrimination in 42.5 percent of complaints lodged with HUD from 2008 through 2019. The next most common was race, which was cited in 28 percent of complaints. Note that complainants may cite more than one basis in complaints filed with HUD; indeed, 4,248 bases were cited in the 4,254 complaints HUD received.

Basis	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	Total
Disability	123	141	174	177	177	135	225	171	165	111	141	66	1,806
Race	111	78	126	147	135	111	147	114	96	51	45	27	1,188
National Origin	87	54	60	39	45	36	60	99	36	12	27	9	564
Sex	24	27	45	30	12	33	15	24	33	12	21	3	279
Familial Status	27	15	24	39	36	24	18	18	12	9	6	3	231
Retaliation	6	18	15	15	33	12	9	15	12	9	0	0	144
Color	0	3	0	3	0	3	0	0	0	0	9	0	18
Religion	0	3	0	0	6	3	0	6	0	0	0	0	18
Total Basis	378	339	444	450	444	357	474	447	354	204	249	108	4,248
Total Complaints	378	339	444	450	444	357	477	450	354	204	249	108	4,254

In addition to the basis for discrimination, HUD records the issue, or alleged discriminatory action related to each complaint. These are presented in Table IV.75. In the same way that bases are reported, more than one issue may be associated with each complaint. Discrimination in terms, conditions, or privileges relating to rental was by far the most common type of discriminatory behavior alleged, cited in 1,710 complaints. The next most common complaint related to Discriminatory terms, conditions, privileges, or services and facilities. Not surprisingly, given the number of complaints that alleged discrimination on the basis of disability, failure to make reasonable accommodation was the third most cited issue, cited in 996 complaints.

Table IV.75	
Fair Housing Complaints by Issue	
Non-Entitlement Areas of Nebraska	
2008–2019 HUD Data	
Issue	Total
Discrimination in terms/conditions/privileges relating to rental	1,710
Discriminatory terms, conditions, privileges, or services and facilities	1,128
Failure to make reasonable accommodation	996
Discriminatory acts under Section 818 (coercion, Etc.)	849
Discriminatory refusal to rent	414
Otherwise deny or make housing unavailable	129
Discriminatory refusal to rent and negotiate for rental	123
Discriminatory advertising, statements and notices	117
Discrimination in services and facilities relating to rental	78
Discriminatory refusal to negotiate for rental	63
False denial or representation of availability - rental	48
Failure to permit reasonable modification	42
Non-compliance with design and construction requirements (handicap)	33
Other discriminatory acts	33
Discrimination in terms/conditions/privileges relating to sale	30
Steering	27
Discriminatory financing (includes real estate transactions)	21
Discrimination in the terms/conditions for making loans	18
Discriminatory refusal to sell	15
Discriminatory acts under Section 901 (criminal)	12
False denial or representation of availability	12
Discrimination in the making of loans	12
Failure to provide an accessible building entrance	12
Discrimination in the selling of residential real property	9
Refusing to provide municipal services or property	9
Failure to provide accessible and usable public and common user areas	6
Other non-compliance with design and construction requirements	6
Discriminatory refusal to sell and negotiate for sale	6
Failure to provide an accessible route into and thru the covered unit	6
Discrimination in terms and conditions of membership	3
Discriminatory refusal to negotiate for sale	3
Failure to provide accessible light switches, electric outlets, etc.	3
Discrimination in services and facilities relating to sale	3
Failure to meet senior housing exemption criteria (55+)	3
Discriminatory advertisement - sale	3
Discriminatory advertisement — rental	3
Adverse action against an employee	3
Failure to provide reinforced walls for grab bars	3
Failure to provide usable doors	3
None	0
Failure to provide usable kitchens and bathrooms	0
Total Issues	5,994
Total Complaints	4,254

Around 50 percent of complaints lodged with the HUD were determined to have no cause, meaning that the HUD investigation did not produce sufficient evidence that discrimination had occurred or was about to occur to file a lawsuit against the accused party. Approximately 3 percent of these complaints, or 126, were withdrawn after resolution of the complaints and 1,440 were conciliated or settled, as shown in Table IV.76.

Closure	Total
No Cause	2,112
Conciliation/ Settlement	1,440
Administrative Closure	372
Charged or FHAP Caused	198
Withdrawn after Resolution	126
Open	6
Total Closures	4,254
Total Complaints	4,254

Table IV.77 presents the bases cited for the complaints considered to have cause: for the purposes of this study, such complaint includes those that were withdrawn after resolution, conciliated, or settled. Disability and race were again the most common complaint bases cited in these complaints, disability was the most common basis in those considered to have cause, cited in 891 complaints, followed by race, cited in 354 complaints.

Basis	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	Total
Disability	57	63	72	96	105	84	117	90	75	57	39	36	891
Race	30	6	30	45	39	45	54	42	30	15	9	9	354
National Origin	33	18	24	12	15	9	39	51	24	6	12	6	249
Familial Status	12	9	12	21	18	15	12	9	6	6	3	3	126
Sex	3	12	12	12	9	6	12	9	6	3	12	0	96
Retaliation	3	3	6	0	3	3	6	3	6	3	0	0	36
Color	0	3	0	3	0	0	0	0	0	0	0	0	6
Total Basis	138	114	156	189	189	162	240	204	147	90	75	54	1,758
Total Complaints	138	114	156	189	189	162	243	207	147	90	75	54	1,710

Discrimination in terms, conditions, or privileges relating to rental was again the most common discriminatory action cited in complaints that were considered to have cause, as shown in Table IV.78. This issue was cited in 693 of the 1,710 complaints considered to have cause, or around 40 percent. Failure to make reasonable accommodation was the second most frequent, alleged in 597 complaints.

Table IV.78	
Fair Housing Complaints Found With Cause by Issue	
Non-Entitlement Areas of Nebraska 2008–2019 HUD Data	
Issue	Total
Discrimination in terms/conditions/privileges relating to rental	693
Failure to make reasonable accommodation	597
Discriminatory terms, conditions, privileges, or services and facilities	375
Discriminatory acts under Section 818 (coercion, Etc.)	324
Discriminatory refusal to rent	159
Discriminatory advertising, statements and notices	75
Discriminatory refusal to rent and negotiate for rental	66
Discrimination in services and facilities relating to rental	45
Otherwise deny or make housing unavailable	36
Non-compliance with design and construction requirements (handicap)	24
Discriminatory refusal to negotiate for rental	24
Failure to permit reasonable modification	24
Steering	21
Discrimination in terms/conditions/privileges relating to sale	15
False denial or representation of availability	12
Other discriminatory acts	9
Discrimination in the terms/conditions for making loans	9
Discrimination in the selling of residential real property	9
False denial or representation of availability - rental	9
Refusing to provide municipal services or property	9
Discriminatory refusal to sell	6
Failure to provide accessible and usable public and common user areas	6
Discrimination in the making of loans	6
Failure to provide an accessible building entrance	6
Failure to provide an accessible route into and thru the covered unit	6
Discriminatory financing (includes real estate transactions)	3
Discriminatory acts under Section 901 (criminal)	3
Failure to provide accessible light switches, electric outlets, etc.	3
Other non-compliance with design and construction requirements	3
Failure to meet senior housing exemption criteria (55+)	3
Discriminatory advertisement - sale	3
Discriminatory advertisement — rental	3
Failure to provide reinforced walls for grab bars	3
Failure to provide usable doors	3
Total Issues	2,592
Total Complaints	1,710

I. FAIR HOUSING SURVEY RESULTS

The Fair Housing survey has a total of 340 responses. Respondents were most likely to be homeowners, in the real estate industry, or an advocate.

Table IV.79 What are your primary roles in the housing industry? State of Nebraska Fair Housing Survey	
Role	Total
Homeowner	90
Advocate	68
Local government	57
Real estate	47
Renter/Tenant	45
Property management	33
Service Provider	32
Construction/Development	24
Banking/Finance	6
Law/Legal services	5
Appraisal	2
Insurance	0

When asked how familiar they are with fair housing laws, most respondents indicated they were at least somewhat familiar, accounting to 212 respondents in the survey.

Table IV.80 How familiar are you with fair housing laws? State of Nebraska Fair Housing Survey	
Response	Total
Not Familiar	41
Somewhat Familiar	119
Very Familiar	94
Missing	86
Total	340

Most respondents also believed that fair housing laws are useful, accounting for 218 total responses. Some 93 respondents felt that fair housing laws are difficult to understand, while 100 respondents did not. Results were mixed when asked if fair housing laws are adequately enforced in the State of Nebraska, and some 68 respondents felt that there should be additional groups protected under fair housing law. Less than half of respondents were aware of any educational activities or training opportunities, and only 51 were aware of fair housing testing in their community.

Table IV.81
Federal and State Fair Housing Laws
 State of Nebraska
 Fair Housing Survey

Question	Yes	No	Don't Know	Missing	Total
Do you think fair housing laws serve a useful purpose?	218	12	25	85	340
Do you think fair housing laws are difficult to understand or follow?	93	100	60	87	340
Do you feel that fair housing laws are adequately enforced in the State of Nebraska?	74	78	95	93	340
Based on your knowledge of fair housing law, do you think that additional groups should be protected under the State fair housing law?	68	76	103	93	340
Outreach and education activities, such as training and seminars, are used to help people better understand their rights and obligations under fair housing law. Are you aware of any educational activities or training opportunities available to you to learn about fair housing laws?	123	81	33	103	340
If you answered "yes" to the previous question, have you participated in fair housing activities or training?	107	43	16	174	340
Fair housing testing is often used to assess potential violations of fair housing law. Testing can include activities such as evaluating building practices to determine compliance with accessibility laws or testing if some people are treated differently when inquiring about available rental units. Are you aware of any fair housing testing of any sort in the State?	51	135	51	103	340

When asked to assess the level of fair housing outreach and education activities in the State, most respondents that answered the question said there was too little. A similar response was seen for the current level of fair housing testing in the State.

Table IV.82
Fair Housing Barriers
 State of Nebraska
 Fair Housing Survey

Question	Too Much	The Right Amount	Too Little	Don't Know	Missing	Total
Please assess the level of fair housing outreach and education activity in the State.	5	56	113	60	106	340
Please assess the current level of fair housing testing in the State.	9	62	124	.	145	340

Respondents were most likely to be aware of impediments to fair housing choice in the private sector in the rental housing market, followed by the real estate industry. However, the majority of respondents were not aware of impediments in any of these areas.

Table IV.83					
Fair Housing Testing and Activities					
State of Nebraska					
Fair Housing Survey					
Question	Yes	No	Don't Know	Missing	Total
Are you aware of any impediments to fair housing choice in these areas in the State?					
The rental housing market? Example: Refusing to rent based on religion or color.	70	95	59	116	340
The real estate industry? Example: Only showing properties to families with children in certain areas.	44	99	78	119	340
The mortgage and home lending industry? Example: Offering higher interest rates to women or racial minorities.	39	100	83	118	340
The home appraisal industry? Example: Basing home values on the ethnic composition of neighborhoods.	33	93	96	118	340
The housing construction or housing design fields? Example: New rental complexes built with narrow doorways that do not allow wheelchair accessibility.	29	113	81	117	340
The home insurance industry? Example: Limiting policies and coverages for racial minorities.	25	95	100	120	340
Any other housing services?	20	83	82	155	340

When asked about barriers in the public sector, respondents were most likely to be aware of barriers that limit access to government services, such as a lack of transportation, employment, or social services. This was followed by neighborhood or community development policies.

Table IV.84					
Fair Housing Barriers					
State of Nebraska					
Fair Housing Survey					
Question	Yes	No	Don't Know	Missing	Total
Are you aware of any impediments or barriers to fair housing choice in the State regarding:					
Are you aware of any barriers that limit access to government services, such as a lack of transportation or employment services?	70	88	56	126	340
Neighborhood or community development policies? Example: Policies that encourage development in narrowly defined areas of the community.	49	89	79	123	340
Occupancy standards or health and safety codes? Example: Codes being inadequately enforced in immigrant communities.	44	91	81	124	340
Land use policies? Example: Policies that concentrate multi-family housing in limited areas.	41	92	85	122	340
Zoning laws? Example: Laws that restrict placement of group homes.	37	93	89	121	340
Property assessment and tax policies? Example: Lack of tax incentives for making reasonable accommodations or modifications for the disabled.	36	87	95	122	340
The permitting process? Example: Not offering written documents on procedures in alternate languages.	34	87	95	124	340
Housing construction standards? Example: Lack of or confusing guidelines for construction of accessible housing.	29	92	97	122	340
Are there any other public administrative actions or regulations that act as a barrier to fair housing choice?	28	84	100	128	340

Only 54 respondents were aware of State fair housing regulations or plans in Nebraska, and 59 were aware of policies that affirmatively further fair housing in the State. Some 51 respondents felt there were specific geographic areas in the State that have fair housing problems.

Table IV.85 Federal and State Fair Housing Laws State of Nebraska Fair Housing Survey					
Question	Yes	No	Don't Know	Missing	Total
Are you aware of any State fair housing ordinance, regulation, or plan in Nebraska?	54	86	71	129	340
Are you aware of any State policies or practices for "affirmatively furthering fair housing" in Nebraska?	59	85	70	126	340
Are there specific geographic areas in the State that have fair housing problems?	51	23	135	131	340

Section V. Fair Housing Goals and Priorities

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)²⁷, and Housing Opportunities for Persons with AIDS (HOPWA) programs into the Consolidated Plan for Housing and Community Development, which then created a single application cycle. As a part of the consolidated planning process, and entitlement communities that receive such funds from HUD are required to submit to HUD certification that they are affirmatively furthering fair housing (AFFH). This was described in the Analysis of Impediments to Fair Housing Choice and a Fair Housing Planning Guide offering methods to conduct such a study was released in March of 1993.

In 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.

²⁷The 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; a second withdrew the on-line Assessment Tool for local government program participants; and, the third noted that the AFFH certification remains in place. HUD went on to say that the AFFH databases and the AFFH Assessment Tool guide would remain available for the AI; and, encouraged jurisdictions to use them, if so desired.

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

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

Overview of Findings

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

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

1. High: Factors that have a direct and substantial impact on fair housing choice, or that Nebraska Department of Economic Development has no authority or limited authority to mandate change, and no capacity or limited capacity to address.
2. Medium: Factors that have a less direct impact on fair housing choice, or that Nebraska Department of Economic Development has limited authority to mandate change.
3. Low: Factors that have a slight or largely indirect impact on fair housing choice, or that Nebraska Department of Economic Development has limited capacity to address.

Table V.1 Contributing Factors State of Nebraska		
Contributing Factors	Priority	Justification
Moderate to high levels of segregation	High	In 2017, black, American Indian, Asian, Native Hawaiian, “other” race, and Hispanic households had a moderate to high level of segregation, according to the Dissimilarity Index.
Access to low poverty areas and concentrations of poverty	High	Low poverty index is markedly lower for black, Native American, and Hispanic populations than white school proficiency, indicating inequitable access to low poverty areas. In addition, there are concentrations of poverty in the State, particularly in the urban centers and spread in the rural parts of the State.
Access to labor market engagement	Med	Black, Native American, and Hispanic households have less access to labor market engagement as indicated by the Access to Opportunity index. However, the State has little control over impacting labor market engagement on a large scale.
Access to School Proficiency	Med	Black, Native American, and Hispanic households have lower levels of access to proficient schools.
Insufficient affordable housing in a range of unit sizes	High	Some 25 percent of households have cost burdens. This is more significant for renter households, of which 39.3 percent have cost burdens. In addition, some 60.1 percent of households below 30 percent HAMFI have cost burdens. This signifies a lack of housing options that are affordable to a large proportion of the population.
Black, Asian, American Indian, and Hispanic households have disproportionate rates of housing problems	High	Black, Asian, American Indian, and Hispanic households face a disproportionate share of housing problems. The statewide average rate of housing problems is 26 percent, while the black households face housing problems at a rate of 46.8 percent, Asian households at a rate of 37 percent, American Indian households at a rate of 43.3 percent, and 38.9 percent for Hispanic households.
Discriminatory patterns in Lending	Med	The mortgage denial rates for black, Native American, and Hispanic households are higher than the jurisdiction average according to 2008-2018 HMDA data.
Insufficient accessible affordable housing	High	The number of accessible affordable units may not meet the need of the growing elderly and disabled population, particularly as the population continues to age. Some 47.4 percent of persons aged 75 and older have at least one form of disability.
Lack of fair housing infrastructure	High	The fair housing survey and public input indicated a lack of collaboration among agencies to support fair housing.
Insufficient fair housing education	High	The fair housing survey and public input indicated a lack of knowledge about fair housing and a need for education.
Insufficient understanding of credit	High	The fair housing survey and public input indicated an insufficient understanding of credit needed to access mortgages.

FAIR HOUSING ISSUES, CONTRIBUTING FACTORS, AND PROPOSED ACHIEVEMENTS

Table V.2 summarizes the fair housing issues/impediments and contributing factors, including metrics, milestones, and a timeframe for achievements.

Table V.2

Fair Housing Goal	Impediments to Fair Housing Choice/ Contributing Factors	Fair Housing Issue	Recommended Actions
Promote homeownership and rental opportunities in high opportunity areas	Moderate to high levels of segregation Access to low poverty areas and concentrations of poverty Insufficient affordable housing in a range of unit sizes Black, Asian, American Indian, and Hispanic households have disproportionate rates of housing problems Discriminatory patterns in Lending	Segregation R/ECAPs Disproportionate Housing Need	Continue to promote homeownership and affordable rental opportunities in high opportunity areas with the use of CDBG, HOME, and HTF funds. Over the next five (5) years: 260 rental units added 600 homeowner units added 100 rental units rehabilitated 650 homeowner housing units rehabilitated Track activities annually in the State’s PER.
Promote community and service provider knowledge of ADA laws	Insufficient accessible affordable housing	Disability and Access	Increase outreach and education for housing providers in the state, focusing on legal requirements concerning reasonable accommodation, in coordination with local disability advocate organizations. Record activities annually.
Enhance community services in R/ECAPs	Access to low poverty areas and concentrations of poverty Access to job proximity Access to school proficiency	Disparities in Access to Opportunity	Encourage increased public services and public investment in R/ECAPs and high poverty areas in the State. Record activities annually.
Increase outreach and education for housing providers in the state	Moderate to high levels of segregation Access to low poverty areas and concentrations of poverty Moderate to high levels of segregation Discriminatory patterns in Lending	Fair Housing Enforcement and Outreach	Continue to raise awareness and educate buyers through enhanced home purchase and credit education, through seminars, webinars and other outreach efforts. Record activities annually. Continue to devote resources to testing and enforcement activities. Raise awareness and educate landlords and property management companies about fair housing law and raise awareness and educate housing consumers about fair housing rights. Conduct 100 fair housing tests annually. Record activities annually. Continue to train community representatives on housing law, including education about the fair housing complaint system, Limited English Proficiency, as well as design and construction standards at the CDBG certification training Record activities annually. Conduct fair housing training sessions with state and local government employees whose work directly impacts housing and community development policy. Continue to support statewide conferences such as the Nebraska Workforce Housing Forum, Housing Innovation Marketplace Conference, and Commission on Human Rights Civil Rights Conference. Record activities annually. Continue to provide fair housing information to the public through the DED office and website, as well as utilizing Limited English Proficiency materials for fair housing education. Record activities annually.

Section VI. Appendices

A. ADDITIONAL PLAN DATA

Race		2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
American Indian	Originated	125	102	63	66	87	92	76	84	103	104	140	1,042
	Denied	14	15	11	11	17	19	20	9	19	16	26	177
	Denial Rate	10.1%	12.8%	14.9%	14.3%	16.3%	17.1%	20.8%	9.7%	15.6%	13.3%	15.7%	14.5%
Asian	Originated	292	355	252	225	347	425	459	550	610	704	693	4,912
	Denied	29	41	28	24	45	57	50	56	51	46	52	479
	Denial Rate	9%	10.4%	10%	9.6%	11.5%	11.8%	9.8%	9.2%	7.7%	6.1%	7%	8.9%
Black	Originated	347	352	258	231	271	293	329	481	466	556	567	4,151
	Denied	64	63	48	41	53	55	61	89	90	83	84	731
	Denial Rate	15.6%	15.2%	15.7%	15.1%	16.4%	15.8%	15.6%	15.6%	16.2%	13%	12.9%	15%
Pacific Islander	Originated	40	39	29	21	30	29	27	46	54	55	39	409
	Denied	8	3	6	2	6	7	4	9	7	6	4	62
	Denial Rate	16.7%	7.1%	17.1%	8.7%	16.7%	19.4%	12.9%	16.4%	11.5%	9.8%	9.3%	13.2%
White	Originated	15,089	16,667	13,478	12,348	14,636	16,523	17,091	19,926	20,540	20,023	21,067	187,388
	Denied	1,637	1,735	1,415	1,312	1,662	1,972	1,806	1,843	1,864	1,509	1,586	18,341
	Denial Rate	9.8%	9.4%	9.5%	9.6%	10.2%	10.7%	16.5%	8.5%	8.3%	7%	7%	8.9%
Not Available	Originated	983	1,090	804	737	819	1,051	1,168	1,416	1,308	1,417	1,919	12,712
	Denied	204	173	155	144	151	188	231	269	257	245	273	2,290
	Denial Rate	17.2%	13.7%	16.2%	16.3%	15.6%	15.2%	16.5%	16%	16.4%	14.7%	12.5%	15.3%
Not Applicable	Originated	7	4	6	6	15	5	6	8	6	8	20	91
	Denied	1	1	0	1	0	0	1	1	0	0	0	5
	Denial Rate	12.5%	20%	0%	14.3%	0%	0%	14.3%	11.1%	0%	0%	0%	5.2%
Total	Originated	16,883	18,609	14,890	13,634	16,205	18,418	19,156	22,511	23,087	22,867	24,506	210,766
	Denied	1,957	2,031	1,663	1,535	1,934	2,298	2,173	2,276	2,288	1,905	2,035	22,095
	Denial Rate	10.4%	9.8%	10%	10.1%	10.7%	11.1%	10.2%	9.2%	9%	7.7%	7.7%	9.5%
Hispanic	Originated	714	810	683	548	695	853	923	1,193	1,296	1,433	1,820	10,968
	Denied	140	152	130	134	168	214	183	204	212	194	218	1,949
	Denial Rate	16.4%	15.8%	16%	19.6%	19.5%	20.1%	16.5%	14.6%	14.1%	11.9%	10.7%	15.1%
Non-Hispanic	Originated	15,131	16,694	13,395	12,357	14,709	16,538	17,067	19,934	20,518	20,053	20,482	186,878
	Denied	1,595	1,688	1,366	1,253	1,601	1,879	1,761	1,819	1,805	1,477	1,511	17,755
	Denial Rate	9.5%	9.2%	9.3%	9.2%	9.8%	10.2%	9.4%	8.4%	8.1%	6.9%	6.9%	8.7%

Table VI.2
Loan Applications by Reason for Denial by Race/Ethnicity of Applicant

State of Nebraska
 2008–2018 HMDA Data

Denial Reason	American Indian	Asian	Black	Pacific Islander	White	Not Available	Not Applicable	Total	Hispanic (Ethnicity)
Debt-to-Income Ratio	22	109	156	8	3,192	466	0	3,955	22
Employment History	2	30	16	3	552	62	0	665	2
Credit History	53	61	236	18	3,123	473	1	3,967	53
Collateral	16	42	47	8	1,937	284	2	2,336	16
Insufficient Cash	3	27	26	2	586	84	0	728	3
Unverifiable Information	4	25	14	2	525	72	0	642	4
Credit Application Incomplete	8	34	42	4	974	186	0	1,248	8
Mortgage Insurance Denied	0	2	2	0	50	5	0	59	0
Other	11	37	50	4	959	116	1	1,182	11
Missing	58	112	142	13	6,443	542	1	7,311	1,830
Total	177	479	731	62	18,341	2,290	5	22,095	1,949
% Missing	32.8%	23.4%	19.4%	21%	35.1%	23.7%	20%	33.1%	93.9%

Table VI.3

Denial Rates by Gender of Applicant

State of Nebraska
 2008–2018 HMDA Data

Year	Male	Female	Not Available	Not Applicable	Average
2008	9.5%	11.5%	17.4%	12.5%	10.4%
2009	9.4%	10.5%	13.3%	12.5%	9.8%
2010	9.5%	10.4%	17.3%	0%	10%
2011	9.4%	11%	17.8%	0%	10.1%
2012	10.2%	11.2%	15.8%	0%	10.7%
2013	10.8%	11.3%	14.8%	0%	11.1%
2014	9.4%	11.2%	15.5%	14.3%	10.2%
2015	8.4%	9.9%	15%	10%	9.2%
2016	8.3%	9.3%	17.6%	0%	9%
2017	7.1%	8%	14.2%	0%	7.7%
2018	7.2%	7.8%	12.8%	0%	7.7%
Average	8.9%	10%	15.3%	3.8%	9.5%

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

State of Nebraska
2008–2018 HMDA Data

Gender		2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
Male	Originated	11,886	12,726	10,305	9,575	11,394	12,757	13,396	15,293	15,530	15,247	16,347	144,456
	Denied	1,252	1,314	1,083	991	1,295	1,542	1,390	1,411	1,410	1,162	1,275	14,125
	Denial Rate	9.5%	9.4%	9.5%	9.4%	10.2%	10.8%	9.4%	8.4%	8.3%	7.1%	7.2%	8.9%
Female	Originated	4,280	5,110	4,054	3,597	4,217	4,836	4,815	6,099	6,622	6,617	6,942	57,189
	Denied	554	598	470	445	530	614	610	668	679	578	585	6,331
	Denial Rate	11.5%	10.5%	10.4%	11%	11.2%	11.3%	11.2%	9.9%	9.3%	8%	7.8%	10%
Not Available	Originated	710	766	525	456	579	820	939	1,110	929	994	1,184	9,012
	Denied	150	118	110	99	109	142	172	196	199	165	174	1,634
	Denial Rate	17.4%	13.3%	17.3%	17.8%	15.8%	14.8%	15.5%	15%	17.6%	14.2%	12.8%	15.3%
Not Applicable	Originated	7	7	6	6	15	5	6	9	6	9	25	101
	Denied	1	1	0	0	0	0	1	1	0	0	0	4
	Denial Rate	12.5%	12.5%	0%	0%	0%	0%	14.3%	10%	0%	0%	0%	3.8%
Total	Originated	16,883	18,609	14,890	13,634	16,205	18,418	19,156	22,511	23,087	22,867	24,506	210,766
	Denied	1,957	2,031	1,663	1,535	1,934	2,298	2,173	2,276	2,288	1,905	2,035	22,095
	Denial Rate	10.4%	9.8%	10%	10.1%	10.7%	11.1%	10.2%	9.2%	9%	7.7%	7.7%	9.5%

Table VI.5
Denial Rates by Income of Applicant

State of Nebraska
2008–2018 HMDA Data

Income	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
\$30,000 or Below	20.9%	19.2%	20.8%	21.4%	21.8%	25.7%	20.6%	20.7%	23%	18.6%	20%	21.1%
\$30,001–\$50,000	11.7%	9.8%	10.9%	10.1%	11.7%	13.2%	13%	12%	11.2%	9.7%	10.5%	11.3%
\$50,001–\$75,000	9%	8.4%	8.6%	9.3%	10.3%	9.8%	9.4%	8.3%	8.8%	7.4%	6.9%	8.6%
\$75,001–\$100,000	6.1%	6.4%	6.8%	7.2%	6.9%	7.2%	7%	6.2%	6.2%	5.8%	5.9%	6.4%
\$100,001–\$150,000	5.7%	5.8%	5.2%	7.1%	6.6%	5.9%	6.2%	4.6%	4.3%	4.1%	4.5%	5.2%
Above \$150,000	5.9%	7.5%	5.3%	4.7%	7%	5.3%	5.7%	5%	4.5%	4.6%	3.8%	5.1%
Data Missing	0%	0%	0%	8.3%	13.3%	7.4%	5.3%	3.4%	19%	14.3%	36%	10.5%
Total	10.4%	9.8%	10%	10.1%	10.7%	11.1%	10.2%	9.2%	9%	7.7%	7.7%	9.5%

Table VI.6

Loan Applications by Income of Applicant: Originated and Denied

State of Nebraska

2008–2018 HMDA Data

Income		2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
\$30,000 or Below	Loan Originated	1,996	2,422	1,762	1,489	1,592	1,672	1,613	1,838	1,594	1,499	1,448	18,925
	Application Denied	527	575	464	406	443	577	419	481	477	342	362	5,073
	Denial Rate	20.9%	19.2%	20.8%	21.4%	21.8%	25.7%	20.6%	20.7%	23%	18.6%	20%	21.1%
\$30,001 –\$50,000	Loan Originated	4,746	5,882	4,305	3,689	4,242	4,663	4,649	5,419	5,533	5,199	5,172	53,499
	Application Denied	627	642	527	414	560	712	696	741	697	561	606	6,783
	Denial Rate	11.7%	9.8%	10.9%	10.1%	11.7%	13.2%	13%	12%	11.2%	9.7%	10.5%	11.3%
\$50,001 –\$75,000	Loan Originated	4,588	4,920	3,692	3,589	4,135	4,700	4,906	5,736	5,826	5,863	6,388	54,343
	Application Denied	454	449	349	366	473	511	512	518	561	470	471	5,134
	Denial Rate	9%	8.4%	8.6%	9.3%	10.3%	9.8%	9.4%	8.3%	8.8%	7.4%	6.9%	8.6%
\$75,001 –\$100,000	Loan Originated	2,715	2,691	2,300	2,163	2,674	3,139	3,368	3,934	4,221	4,080	4,321	35,606
	Application Denied	177	183	168	169	198	242	252	261	280	250	271	2,451
	Denial Rate	6.1%	6.4%	6.8%	7.2%	6.9%	7.2%	7%	6.2%	6.2%	5.8%	5.9%	6.4%
\$100,001 –\$150,000	Loan Originated	1,834	1,804	1,841	1,709	2,279	2,816	2,937	3,623	3,797	4,042	4,524	31,206
	Application Denied	110	111	101	130	161	176	193	173	171	174	213	1,713
	Denial Rate	5.7%	5.8%	5.2%	7.1%	6.6%	5.9%	6.2%	4.6%	4.3%	4.1%	4.5%	5.2%
Above \$150,000	Loan Originated	989	874	968	984	1,257	1,403	1,665	1,933	2,099	2,166	2,637	16,975
	Application Denied	62	71	54	49	95	78	100	101	98	105	103	916
	Denial Rate	5.9%	7.5%	5.3%	4.7%	7%	5.3%	5.7%	5%	4.5%	4.6%	3.8%	5.1%
Data Missing	Loan Originated	15	16	22	11	26	25	18	28	17	18	16	212
	Application Denied	0	0	0	1	4	2	1	1	4	3	9	25
	Denial Rate	0%	0%	0%	8.3%	13.3%	7.4%	5.3%	3.4%	19%	14.3%	36%	10.5%
Total	Loan Originated	16,883	18,609	14,890	13,634	16,205	18,418	19,156	22,511	23,087	22,867	24,506	210,766
	Application Denied	1,957	2,031	1,663	1,535	1,934	2,298	2,173	2,276	2,288	1,905	2,035	22,095
	Denial Rate	10.4%	9.8%	10%	10.1%	10.7%	11.1%	10.2%	9.2%	9%	7.7%	7.7%	9.5%

Table VI.7								
Denial Rates of Loans by Race/Ethnicity and Income of Applicant								
State of Nebraska 2008–2018 HMDA Data								
Race	\$30,000 or Below	\$30,001 – \$50,000	\$50,001 –\$75,000	\$75,001 –\$100,000	\$100,001 –\$150,000	> \$150,000	Data Missing	Average
American Indian	20.3%	10.7%	13.9%	13.9%	13.9%	16.3%	100%	14.5%
Asian	16.5%	10.2%	7.8%	5.7%	4.9%	5.4%	33.3%	8.9%
Black	25.9%	15.2%	13.7%	12.8%	8.4%	11.2%	100%	15%
Pacific Islander	31.5%	12.8%	12.5%	10.6%	4.6%	10.3%	%	13.2%
White	20.2%	10.7%	8.1%	6%	4.9%	4.7%	8%	8.9%
Not Available	34.4%	18.4%	14.5%	10.7%	7.9%	7.9%	22.2%	15.3%
Not Applicable	2.5%	50%	20%	0%	0%	0%	%	5.2%
Average	21.1%	11.3	8.6%	6.4%	5.2%	5.1%	10.5%	9.5%
Non-Hispanic	22.1%	14.7	12.5%	11.4%	8.5%	7.1%	0%	15.1%
Hispanic	19.8%	10.4	8%	5.9%	4.9%	4.8%	9.9%	8.7%

Table VI.8									
Loan Applications by Income and Race/Ethnicity of Applicant: Originated and Denied									
State of Nebraska 2008–2018 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	208	334	235	124	105	36	0	1,042
	Application Denied	53	40	38	20	17	7	2	177
	Denial Rate	20.3%	10.7%	13.9%	13.9%	13.9%	16.3%	100%	14.5%
Asian	Loan Originated	661	1,297	1,127	784	605	436	2	4,912
	Application Denied	131	148	96	47	31	25	1	479
	Denial Rate	16.5%	10.2%	7.8%	5.7%	4.9%	5.45	33.3%	8.9%
Black	Loan Originated	468	1,281	1,141	587	467	207	0	4,151
	Application Denied	164	230	181	86	43	26	1	731
	Denial Rate	25.9%	15.2%	13.7%	12.8%	8.4%	11.2%	100%	13.2%
Pacific Islander	Loan Originated	37	116	84	84	62	26	0	409
	Application Denied	17	17	12	10	3	3	0	62
	Denial Rate	31.5%	12.8%	12.5%	10.6%	4.6%	10.3%	%	13.2%
White	Loan Originated	16,434	47,634	48,517	31,809	27,874	14,924	196	187,388
	Application Denied	4,162	5,706	4,256	2,023	1,438	739	17	18,341
	Denial Rate	20.2%	10.7%	8.1%	6%	4.9%	4.7%	8%	8.9%
Not Available	Loan Originated	1,034	2,824	3,219	2,204	2,080	1,337	14	12,712
	Application Denied	543	638	548	264	178	115	4	2,290
	Denial Rate	34.4%	18.4%	14.5%	10.7%	7.9%	7.9%	22.2%	15.3%
Not Applicable	Loan Originated	79	2	4	2	1	3	0	91
	Application Denied	2	2	1	0	0	0	0	5
	Denial Rate	2.5%	50%	20%	0%	0%	0%	%	5.2%
Total	Loan Originated	18,925	53,499	54,343	35,606	31,206	16,975	212	210,766
	Application Denied	5,073	6,783	5,134	2,451	1,713	916	25	22,095
	Denial Rate	21.1%	11.3%	8.6%	6.4%	5.2%	5.1%	10.5%	9.5%
Hispanic	Loan Originated	2,356	4,057	2,606	1,041	633	273	2	10,968
	Application Denied	667	697	371	134	59	21	0	1,949
	Denial Rate	22.1%	14.7%	12.5%	11.4%	8.5%	7.1%	0%	15.1%
Non-Hispanic	Loan Originated	15,487	46,644	48,493	32,283	28,440	15,331	200	186,878
	Application Denied	3,833	5,406	4,209	2,038	1,472	775	22	17,755
	Denial Rate	19.8%	10.4%	8%	5.9%	4.9%	4.8%	9.9%	8.7%

Table VI.9

Loans by Loan Purpose by HAL Status

State of Nebraska
2008–2018 HMDA Data

Loan Purpose		2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
Home Purchase	HAL	1,650	1,068	117	96	90	61	78	65	69	47	80	3421
	Other	15,233	17,541	14,773	13,538	16,115	18,357	19,078	22,446	23,018	22,820	24,437	207356
	Percent HAL	9.8%	5.7%	0.8%	0.7%	0.6%	0.3%	0.4%	0.3%	0.3%	0.2%	0.3%	1.6%
Home Improvement	HAL	835	652	148	143	172	142	117	91	94	108	147	2649
	Other	3,325	2,778	2,967	2,739	3,039	3,482	3,394	3,959	4,081	3,666	2,468	35898
	Percent HAL	20.1%	19%	4.8%	5%	5.4%	3.9%	3.3%	2.2%	2.3%	2.9%	5.6%	1.6%
Refinancing	HAL	3,554	2,745	345	300	299	219	105	120	99	85	74	7945
	Other	14,762	36,546	37,285	28,766	41,070	27,328	11,586	16,003	18,983	11,755	10,760	254844
	Percent HAL	19.4%	7%	0.9%	1%	0.7%	0.8%	0.9%	0.7%	0.5%	0.7%	0.7%	1.6%
Total	HAL	6,039	4,465	610	539	561	422	300	276	262	240	473	14187
	Other	33,320	56,865	55,025	45,043	60,224	49,167	34,058	42,408	46,082	38,241	40,047	500480
	Percent HAL	15.3%	7.3%	1.1%	1.2%	0.9%	0.9%	0.9%	0.6%	0.6%	0.6%	1.2%	2.8%

Table VI.10

HALs Originated by Race of Borrower

State of Nebraska
2008–2018 HMDA Data

Race	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
American Indian	7	6	1	1	0	0	0	0	0	0	1	15
Asian	24	22	11	1	1	0	1	2	1	1	1	63
Black	39	14	2	2	0	0	2	0	1	1	0	60
Pacific Islander	4	3	0	0	0	0	0	0	1	0	0	8
White	1,493	978	103	87	85	55	69	56	66	44	56	2,992
Not Available	83	45	0	2	4	6	6	7	0	1	11	153
Not Applicable	0	0	0	3	0	0	0	0	0	0	0	3
Total	1,650	1,068	117	96	90	61	78	65	69	47	80	3421
Hispanic	136	87	7	4	5	3	5	1	5	4	1	7,462
Non-Hispanic	1,432	935	109	87	81	53	66	57	64	42	55	143,459

Table VI.11

Rate of HALs Originated by Race/Ethnicity of Borrower

State of Nebraska
2008–2018 HMDA Data

Race	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Average
American Indian	5.6%	5.9%	1.6%	1.5%	0%	0%	0%	0%	0%	0%	0.7%	1.9%
Asian	8.2%	6.2%	4.4%	0.4%	0.3%	0%	0.2%	0.4%	0.2%	0.1%	0.1%	1.8%
Black	11.2%	4%	0.8%	0.9%	0%	0%	0.6%	0%	0.2%	0.2%	0%	2%
Pacific Islander	10%	7.7%	0%	0%	0%	0%	0%	0%	1.9%	0%	0%	2.5%
White	9.9%	5.9%	0.8%	0.7%	0.6%	0.3%	0.4%	0.3%	0.3%	0.2%	0.3%	2%
Not Available	8.4%	4.1%	0%	0.3%	0.5%	0.6%	0.5%	0.5%	0%	0.1%	0.6%	1.6%
Not Applicable	0%	0%	0%	50%	0%	0%	0%	0%	0%	0%	0%	4.8%
Average	9.8%	5.7%	0.8%	0.7%	0.6%	0.3%	0.4%	0.3%	0.3%	0.2%	0.3%	1.6%
Hispanic	19%	10.7%	1%	0.7%	0.7%	0.4%	0.5%	0.1%	0.4%	0.3%	0.1%	3.3%
Non-Hispanic	9.5%	5.6%	0.8%	0.7%	0.6%	0.3%	0.4%	0.3%	0.3%	0.2%	0.3%	2%

Table VI.12

Loans by HAL Status by Race/Ethnicity of Borrower

State of Nebraska
2008–2018 HMDA Data

Race	Loan Type	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
American Indian	HAL	7	6	1	1	0	0	0	0	0	0	1	15
	Other	118	96	62	65	87	92	76	84	103	104	139	783
	Percent HAL	5.6%	5.9%	1.6%	1.5%	0%	0%	0%	0%	0%	0%	0.7%	1.9%
Asian	HAL	24	22	11	1	1	0	1	2	1	1	1	63
	Other	268	333	241	224	346	425	458	548	609	703	692	3,452
	Percent HAL	8.2%	6.2%	4.4%	0.4%	0.3%	0%	0.2%	0.4%	0.2%	0.1%	0.1%	1.8%
Black	HAL	39	14	2	2	0	0	2	0	1	1	0	60
	Other	308	338	256	229	271	293	327	481	465	555	567	2,968
	Percent HAL	11.2%	4%	0.8%	0.9%	0%	0%	0.6%	0%	0.2%	0.2%	0%	2%
Pacific Islander	HAL	4	3	0	0	0	0	0	0	1	0	0	8
	Other	36	36	29	21	30	29	27	46	53	55	39	307
	Percent HAL	10%	7.7%	0%	0%	0%	0%	0%	0%	1.9%	0%	0%	2.5%
White	HAL	1,493	978	103	87	85	55	69	56	66	44	56	2,992
	Other	13,596	15,689	13,375	12,261	14,551	16,468	17,022	19,870	20,474	19,979	21,011	143,306
	Percent HAL	9.9%	5.9%	0.8%	0.7%	0.6%	0.3%	0.4%	0.3%	0.3%	0.2%	0.3%	2%
Not Available	HAL	83	45	0	2	4	6	6	7	0	1	11	153
	Other	900	1,045	804	735	815	1,045	1,162	1,409	1,308	1,416	1,908	2,968
	Percent HAL	8.4%	4.1%	0%	0.3%	0.5%	0.6%	0.5%	0.5%	0%	0.1%	0.6%	1.6%
Not Applicable	HAL	0	0	0	3	0	0	0	0	0	0	0	3
	Other	7	4	6	3	15	5	6	8	6	8	20	60
	Percent HAL	0%	0%	0%	50%	0%	0%	0%	0%	0%	0%	0%	4.8%
Total	HAL	1,650	1,068	117	96	90	61	78	65	69	47	80	3421
	Other	15,233	17,541	14,773	13,538	16,115	18,357	19,078	22,446	23,018	22,820	24,437	207356
	Percent HAL	9.8%	5.7%	0.8%	0.7%	0.6%	0.3%	0.4%	0.3%	0.3%	0.2%	0.3%	1.6%
Hispanic	HAL	136	87	7	4	5	3	5	1	5	4	1	7,462
	Other	578	723	676	544	690	850	918	1,192	1,291	1,429	1,819	253
	Percent HAL	19%	10.7%	1%	0.7%	0.7%	0.4%	0.5%	0.1%	0.4%	0.3%	0.1%	3.3%
Non-Hispanic	HAL	1,432	935	109	87	81	53	66	57	64	42	55	143,459
	Other	13,699	15,759	13,286	12,270	14,628	16,485	17,001	19,877	20,454	20,011	20,427	2,884
	Percent HAL	9.5%	5.6%	0.8%	0.7%	0.6%	0.3%	0.4%	0.3%	0.3%	0.2%	0.3%	2%

Table VI.13

Rates of HALs by Income of Borrower

State of Nebraska
2008–2018 HMDA Data

Income	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Average
\$30,000 or Below	14.3%	8.7%	1.8%	1.6%	0.9%	0.6%	0.9%	0.6%	0.9%	0.4%	0.4%	3.9%
\$30,001–\$50,000	11.7%	5.3%	1%	0.8%	0.6%	0.2%	0.4%	0.3%	0.3%	0.2%	0.2%	2.4%
\$50,001–\$75,000	9.7%	5.2%	0.5%	0.5%	0.5%	0.3%	0.3%	0.3%	0.2%	0.3%	0.2%	1.9%
\$75,001–\$100,000	7.4%	5.2%	0.7%	0.5%	0.3%	0.2%	0.2%	0.2%	0.2%	0.2%	0.3%	1.5%
\$100,00–\$150,000	5.8%	5%	0.2%	0.4%	0.4%	0.4%	0.4%	0.2%	0.2%	0.2%	0.4%	1.1%
Above \$150,000	5.4%	6.8%	0.7%	0.9%	0.9%	0.5%	0.5%	0.4%	0.3%	0%	0.4%	1.4%
Data Missing	6.7%	18.8%	0%	0%	0%	0%	0%	0%	0%	0%	40.7%	6.7%
Average	9.8%	5.7%	0.8%	0.7%	0.6%	0.3%	0.4%	0.3%	0.3%	0.2%	0.3%	1.6%

Table VI.14

Loans by HAL Status by Income of Borrower

State of Nebraska
2008–2018 HMDA Data

Income		2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
\$30,000 or Below	HAL	285	210	31	24	15	10	15	11	15	6	6	616
	Other	1,711	2,212	1,731	1,465	1,577	1,662	1,598	1,827	1,579	1,493	1,442	15,362
	Percent HAL	14.3%	8.7%	1.8%	1.6%	0.9%	0.6%	0.9%	0.6%	0.9%	0.4%	0.4%	3.9%
\$30,001–\$50,000	HAL	556	313	42	30	25	11	20	16	19	9	11	1,032
	Other	4,190	5,569	4,263	3,659	4,217	4,652	4,629	5,403	5,514	5,190	5,161	42,096
	Percent HAL	11.7%	5.3%	1%	0.8%	0.6%	0.2%	0.4%	0.3%	0.3%	0.2%	0.2%	2.4%
\$50,001–\$75,000	HAL	446	254	18	17	22	16	15	18	13	16	10	819
	Other	4,142	4,666	3,674	3,572	4,113	4,684	4,891	5,718	5,813	5,847	6,378	41,273
	Percent HAL	9.7%	5.2%	0.5%	0.5%	0.5%	0.3%	0.3%	0.3%	0.2%	0.3%	0.2%	1.9%
\$75,001–\$100,000	HAL	202	139	15	10	8	6	8	7	9	8	14	404
	Other	2,513	2,552	2,285	2,153	2,666	3,133	3,360	3,927	4,212	4,072	4,307	26,801
	Percent HAL	7.4%	5.2%	0.7%	0.5%	0.3%	0.2%	0.2%	0.2%	0.2%	0.2%	0.3%	1.5%
\$100,001–\$150,000	HAL	107	90	4	6	9	11	11	6	7	8	18	251
	Other	1,727	1,714	1,837	1,703	2,270	2,805	2,926	3,617	3,790	4,034	4,506	22,389
	Percent HAL	5.8%	5%	0.2%	0.4%	0.4%	0.4%	0.4%	0.2%	0.2%	0.2%	0.4%	1.1%
Above \$150,000	HAL	53	59	7	9	11	7	9	7	6	0	10	168
	Other	936	815	961	975	1,246	1,396	1,656	1,926	2,093	2,166	2,627	12,004
	Percent HAL	5.4%	6.8%	0.7%	0.9%	0.9%	0.5%	0.5%	0.4%	0.3%	0%	0.4%	1.4%
Data Missing	HAL	1	3	0	0	0	0	0	0	0	0	0	15
	Other	14	13	22	11	26	25	18	28	17	18	16	208
	Percent HAL	6.7%	18.8%	0%	0%	0%	0%	0%	0%	0%	0%	40.7%	6.7%
Total	Other	1,650	1,068	117	96	90	61	78	65	69	47	80	3421
	HAL	15,233	17,541	14,773	13,538	16,115	18,357	19,078	22,446	23,018	22,820	24,437	207356
	Percent HAL	9.8%	5.7%	0.8%	0.7%	0.6%	0.3%	0.4%	0.3%	0.3%	0.2%	0.3%	1.6%

B. PUBLIC INPUT DATA

Nebraska Analysis of Impediments Public Input Meeting

Presentation

Thank you so much for joining me for the 2020 State of Nebraska Analysis to Impediments of AI or Analysis of Impediments to Fair Housing Choice for the kind of the part of the whole consolidated planning process. We're in Lincoln last week doing this very same presentation. We had some good comments and we hope to hear some excellent comments from you. Everything that I have in this presentation, which will be made available on the website, or you can send me an email and I'll forward you a copy after this will be already in the report. So really, the main purpose of this today's meeting is to share some preliminary findings and hear of any concerns that you may have, or comments or, you know, insights into barriers and Fair Housing Choice, like said, if you write them down on the question they'll show up there or the chat or you know, you can feel free to just speak up. I believe this is all being recorded as well. So that's full disclosure, full disclosure. All right. So, like I said, the intent of this meeting is to review some fair housing protections, introduce you to the Affirmatively Furthering Fair Housing rule and its immediate demise or nearly immediate demise. Show some fair housing data and maps, gain some input on the perspective to help shape the AI draft plan and emphasize the 2019 or 2020 now, fair housing survey. If you haven't taken the survey, please do. We'll have the survey link for you here. And if you have taken the survey, thank you so much forward it on to your friends, your family, those in your professional network, anyone that you know, anyone living in Nebraska that might have some input, or just like to learn a little bit more about fair housing.

So fair housing protections, Federal and State Fair Housing Acts protect several groups and housing transaction. Federal Rules are federal protected classes race, color, national origin, religion, gender, familiar or marital status and disability. There are several other states across the country or jurisdictions that have additional protected classes, but these are the ones that are protected in Nebraska. I have heard throughout my travels that this list is too short things that I have heard that that have expressed need, and you may or may not agree with them our source of income I have heard as a protected class. So, Housing Choice vouchers, section 8 recipients that is currently not protected. Veteran status I've heard should be a protected class and returning citizens or those with a criminal history, often faced housing problems or you know, issues in securing housing. Those currently are not a protected class. If you believe they should be, we can, you know, add it to the comment, I just those are the most the most common additional protected classes that I have heard throughout my travels.

But this is what we have in Nebraska as of today. So, State of Nebraska Analysis to Impediments to Fair Housing, this is a statewide report if you are at my earlier webinar or saw me in Lincoln, the Consolidated Plan, which is kind of this is kind of a part of is just the non-entitlement areas of the state. All the data in this presentation and actually in the AI report itself will be statewide data because fair housing is a statewide issue, especially in a couple of Omaha and Lincoln has some RCAP/ECAP areas that we'll see a little bit later in the presentations, however, so entitlement jurisdictions receive federal funding from HUD must certify that they are Affirmatively Furthering fair housing as a condition to receive grants. So, it's kind of part of the consolidated planning process, outside of that a little bit but it has to be filed at the same time. So, over the past 20 years, AFH meant preparing and Analysis to Impediments to Fair Housing Choice in AI. You conducted in AI, you identified barriers to Fair Housing Choice, and you took actions on those impediments if any impediments or barriers were found, and you maintain records of those actions. In 2015, HUD rolled out a thing called the AFFH. And part of this AFFH thing, they changed a couple of the language, we have local knowledge, identify fair housing issues

instead of barriers and contributing factors to those issues instead of impediments and we prioritize fair housing goals. Part of this whole AFFH rollout is a HUD use this on created an online assessment tool with all the data that anyone or jurisdiction should be able to use to identify fair housing issues and contributing factors.

There was a couple issues with the data set number one and it relies heavily on the 2009 to 2013, American Community Survey data, those of us who were around then I'm guessing all of us were because that was wasn't too long ago that is the height of the Great Recession. So, the 2009 to 2013 ACS data shows a starkly different landscape, economic demographic housing landscape them where we find ourselves today. Also use the 2009 to 2013 CHAS data, Comprehensive Housing Affordability Strategy data set. Again, that's a very different time and you know, economic demographic housing trends that we find ourselves in today. So, what we did is we reverse engineered all the data, we are able to, to, you know, manufacturer reverse engineer in the HUD AFFH data set using the most recent Census data and the most recent CHAS data. So, we use the AFFH you know, data frameworks, but with the most recent data, except for a couple indices. That we'll see here that we had to use the original AFFH data set. So, the operating context is a fair housing issue is a condition that restricts Fair Housing Choice or access to opportunity. Alongside this AFH data set roll out they had this kind of new concept called access to opportunity, and they were trying to measure those are fair housing issues. So, access opportunities, kind of quality of life there. They're trying to get a quality of life metrics ease and how those may vary based on race or ethnicity. Contributing factor creates contributes to or perpetuates increases the severity of fair housing issues that were identified in the first one, and a fair housing goal or things that are committed to and must be done for the AFFH required. Okay, so they put all that out. It was supposed to be easy for jurisdictions to do themselves, but it wasn't, it was rather confusing. A lot of the concepts that they tried to, you know include in this data set are just a little confusing, especially for the general population there took me a little while to get my head around as well. I'll walk you through a lot of those. So, they decided to suspend the rule. So, until further notice, and they have put out a notice that they actually might just completely get a do away with all these things. But where we are now, we have to do an AI we have to file that the old way of Analysis to Impediments to Fair Housing Choice identifying impediments, but we have to do it through an AFH framework. So, we have to include these as these additional AFFH data concepts that were put out in this online assessment tool. And we'll work through we'll work through what those are and what they look like.

So, the AI/AFFH report will have an executive summary and we'll talk about the community participation process of which now you are involved in which is great, thank you so much for showing up. We were also like I said in Lincoln doing the same presentation last week, we had some great comments and great turnout there. We also have a fair housing survey running the second time I said it, I'll say it at least 10 more times. If you haven't taken it, please do if you have thank you, forward it on. We look at past goals and actions and we kind of see what's going on. And we have analysis and we develop goals and priorities and any tendencies if we need them. The community participation process, like I mentioned to is we have a fair housing survey. We had a fair housing forum, and we're having professional fair housing focus groups we're at now and then there'll be a public review meeting in March. So, keep your ear out for that one. So, after the initial findings and all the analysis and public input have been, you know, coalesced and distilled down into factors and recommended actions, we come back and we share them with the public and offer one additional opportunity for people to chime in on. So, HUDs fair housing issues, here we have seven of them are segregation analysis. They try to quantify this through what is known as the dissimilarity index will run through that in a further slide, RCAP and ECAP area. So, RCAP stands for up here racially concentrated areas of poverty and ethnically concentrated areas of poverty. And the United States Census as we'll see in a bit, you have a race and ethnicity. So, they separate them

out disparities and access to opportunity. And those are the based on the several indices in the AFFH data set. That unfortunately, we were unable to recreate everything else we were able to redo except for these access to indices, but we'll work through them later in the presentation as well. Disproportionate housing needs relies on the CHAS community or Comprehensive Housing Affordability Strategy dataset that is produced by HUD for the consolidated planning purpose. It's a special tabulation from the US Census Bureau and pays the Census. So, I don't know how that all works, but it comes out and it's a big, big lot of the tables, C is for comprehensive. So, we'll walk through that, but it shows housing needs by several you know, household characteristics, one of which is race. So, we can see if there's a racial or ethnic breakdowns that are experiencing disproportionate housing needs. We look at publicly where the publicly supported housing is. Is it clustered in RCAP/ECAP areas? Is it not? We look at disability and access analysis. A lot of people think about fair housing as based in race, fair housing complaints, you know, when they're filed, or actually the majority of them are file with a basis in disability, folks, persons with a disability that can, you know, reasonably accommodate their dwelling units or something like that. There's a lot of a lot of fair housing issues actually, in the, you know, our disability are based in disability, as we'll see later, and fair housing enforcement, outreach, etc. So, these are the issues that we're going to work through the purpose of today's meeting, we review some socio economic context, we present a bunch of data. We do a lot of data analysis based on the Census and the AFFH data set and the CHAS data excuse me, we look at segregation and RCAP/ECAPs, discussed disparities and opportunity discuss disability and address fair housing enforcement and outreach. Like I said, this is a statewide report. Instead, the Consolidated Plan that we were focusing on earlier is not entitlement areas. This is the state wide as a whole. And we see a pretty decent, you know, almost linear population growth rate. For the State of Nebraska, it's good to go up population growth is a good thing. So that's so that's good slide.

And here we go population by race, race and ethnicity, 2010 Census and the 2017, five year American Community Survey. So anytime you see a table like this, we just I just want to walk you through how to actually read this table. Since so this is the 2010 Census. The Census is a count of all the people in the country or your city or everything. It's a total count. A 2017 five year American Community Survey is a survey. So, it's a sample size, they send out forms and people fill the forms back in and they send it out. So, the methodologies are different. Because the methodology between the two are different, you can't actually compare the numbers between the two time periods. So, you can't actually look at the population in 2010, compared to the population in 2017, five year ACS, but what you can do is you can look at the percentage of total and compare those across the two time periods. So, we see here the white population in the State of Nebraska, rose from 86.1% of the population to 87.8% of the population, African American household or birth population also rose from 4.5 to 4.7%. And then we see here non-Hispanic and Hispanic because in the United States Census, you have a race and an ethnicity. So, you can identify as white, non-Hispanic, white, Hispanic, black, non-Hispanic, black, Hispanic, so you have both a HUD, the CHAS dataset that actually puts them together, which is a little confusing. We'll talk about that later on. We see here that Hispanic households also increased from 9.2 to 10.5% of the population. So, breaking over 10% in the most recent 2017 five year ACS. Now when you take the Census or the American Community Survey, they summit together and what are known as summary levels, some levels, the very smallest geographic area and the Census is called the block and that corresponds to a city block; city blocks are pretty small. So, they add those up together, they add a bunch of groups of city blocks together to make a block group. Block Groups are also still pretty small. So, they added up to one more level. See if I can get into the camera there, we go to Census tract level. Now this is a map of Census tracts. Census tracts are also they add the blocks and block groups together, they try to get a roughly equivalent population in the size of Census tract. So that's why you see, you know, Census tracts and more rural less popular, less sparsely more sparsely populated areas having

larger Census tracts, you know, some counties only have two Census tracts, when we get into Omaha or Lincoln, density, denser population Census tracts are much, much smaller to kind of equate the population size to across the two. So here a percentage of concentration of white households. You know, overall, we're seeing 87.8% of all population in Nebraska are white, so this white population, there are some pockets reaching 99.1 to 100% white population. There are some notable the notable thing about this maps are the lower levels where we have less concentrations white population here and over here. And then we'll see about that. African American population concentrated pretty heavily in just more urbanized areas. Omaha it's kind of hard to see in Lincoln and along the I-80 corridor, Hispanic population also there's a couple pockets of higher kind of concentrated Hispanic population. The blue purple is 49.8 to 80.2% of all persons in those Census tracts are Hispanic. So that's actually a pretty big concentration area. You can see some here. They're kind of hard to see on a statewide map. But there we go. Don't have American Indian. Oh my goodness. I don't know why we don't have American Indian in here, but I can show like these two Census tracts up here are high concentrations of American Indian population as well. And also, on the border up here with the reservation. Okay, so uh, oh, things are going crazy. Alright. This is a poverty by age in the 2010 Census, they did not ask about your income. They decided to take the income question out of the Census and put it in the American Community Survey with the idea that it would roll every year. They changed the poverty question and the ACS data. So, they we will so they weren't able to we weren't able to get anything besides the most recent ACS stuff, and the 2000 Census, unfortunately. Here we see a percentage of population in poverty for the entire state rose from 9.7 to 12%. That's pretty big time period. A lot happened between then and there. So, it's not too surprising that we see a poverty rate increase, although that rate isn't increasing too high compared to other places that I've seen. Concentrations of poverty throughout the state against Census tract level mapping. We see here some higher concentrations, and this is this does have some higher concentrations of Native American Indian households there. You can probably you probably can't see it, because we have the sign there, but they're also high concentrations, you know. Housing units by tenure. Okay, how you read this chart, this is kind of a nested table we see occupied plus vacant equals total housing units. Total housing unit is a physical housing structure. It's a single family unit, apartment, mobile home. triplex duplex whatever you can live in it a boat. That's cool. That's in there. I did here. And Nebraska has the largest coastline of rivers out of all the states in the country. That's the word on the street. Anyway, so once you move into a housing unit it becomes occupied, or a household, which is up here and then if it's occupied is either renter occupied, or owner occupied. So, we see here that the percentage share of owner occupied housing fell slightly from 67.2 to 66%, of the total of all occupied housing units households, commercially, the renter occupied household rose from 32.8 to 34%. This is the 2017 five year American Community Survey. So, it's averages over the last five years. So we do see, you know, it's still got a little bit of the post-recession or a little tail end of the recession, post-recession recovery, and we did see over that period of people switching slightly from single family to rental units, however, so that that's why we kind of see that that bit of a shift there. Vacant housing units fell actually from 9.5 to 9.2% of the total housing stock in the state. So that that's good to see that fall, households by income. Now, we do see here that the income of the households actually, you know, we do see less than 15,000 fell from 12.2 to 10.1%. And then that trend kind of continues, most of the lower income household's kind of fell. And then we see here at the very top end 75 to 99 rose from 12.8 to 13.4, and \$100,000 or more rose, pretty big actually 16% to 22.9% of the household. So, we do see incomes or at least income bracket, household incomes rising as percentage share the total population. However, this data is not adjusted for inflation, so dollars over here on the 2017, five year Americans you survey are worth less than the dollar is in the 2010 five your ACS. So that inflation certainly plays a role in that, you know, increasing cost of living and things like that, but not that big of a jump, and that that's a pretty big percentage jump up for that for that income breakdown. Okay, households by year home built and we see here the majority are, you know, there is a couple

years where housing stock was built first 1939 or older, counts for a 20.2% so roughly a fifth of all housing stock in Nebraska was built before 1939. And we see another kind of big building year well 1960 to 79 if you put those together, that's also pretty big 1979, 16.3% of the housing stock was built their cc so a lot of stuff built before 1939 from the 60s to the 80s or 1979 also kind of a big, a big one. And then we see some additional units are bigger units built in 1990, 1999, and 2000, then 2009 11.9 and 12% of the Nebraska housing stock. So, we see a couple of clusters of decades where we see some bigger housing stock built. So this is owner occupied by median family and we see here, you know, so just remember, one fifth was building 30 in the 30s, or earlier 60s, 70s and 2000. So, we see here, the earlier stuff 1939, the majority, majority fifth the housing stock had a median value of about \$92,000. When we kind of go down as the, you know, the year structure build increases, so does a median value. So, we see another kind of bigger year in 1979, \$141,000 was the median value, then we kind of go up again and we see the 2000 to 2009, \$227,000 and things are kind of really increasing but it's time to get to 2014 or later. median value of a structure bill was up to \$330,000. So that's a that's a quite a big increase as so basically as the newer structures are built, newer units are normally bigger, and they command a higher premium. Okay, so now we're diving into HUD AFFH land. This is a what is known as the dissimilarity index. This came out of that HUD AFH online interactive or online assessment tool that they put together. It's a way of measuring or you know, there is a way of measuring segregation according to HUD, what it actually measures is how, how a lower level geography, how similar or dissimilar, a lower level area compares to a higher level area. That's why it's called the dissimilarity index and the legend they use the dissimilarity index and convert it then to segregation. Okay. The formula that you use is over here on the right if that's not your thing, don't worry, it's my thing. That's why I'm here pointing at it. Basically, it's you know, it evaluates how smaller level areas, in this case Census tracts, compared to the State of Nebraska. I just want to point out here that this equation is very sensitive to this i here we chose a Census tracts j, the state, if this I was a block group or a block, immediately you get higher segregation boundaries, instead of we decided and this is statewide analysis, maybe Census tracts are too small, we should just use counties. You know, there's 93 counties in Nebraska, we can do that. The segregation would immediately decrease because most counties look almost identical to the state. So, we do Census tracts and happy median. It's just highly sensitive to that. I just wanted to point that out. We do, however, see once we run the numbers that African American households have a dissimilarity index rate of above 60, which corresponds according to HUD to high segregation, but between 2010 and most recent 2017 ACS we do see a decrease, slight decrease in the dissimilarity index. We also see an American Indian households, we do see an increase rising from above 50, which is, you know, in the moderate segregation area, almost a 60. So according to the similarity index, we see increasing levels of segregation among American Indian Native American households. Hispanic households, moderate levels of segregation were about, you know, under 50. This between this 40 and 54, down here moderate levels of segregation, and that remained pretty constant over the 2010 to 2017 five year ACS. So, quick recap was the slight decrease, I mean, highly segregated African American populations but decreasing. Increasing American Indian segregated populations and Hispanics, moderately segregated but remaining the same. According to this according to the dissimilarity index put out by HUD. RCAPs and ECAPs we see here our RCAP is a racially concentrated area poverty and ECAP is an ethnically concentrated areas of poverty. This again comes out of the AFH dataset, excuse me, and the equation to determine if your RCAP or ECAP is down here. Again, that's not your thing, don't worry. It basically says you have to fill two conditions Census tract must fulfill two conditions to become an archive RCAP/ECAP, the first of which is you have to have a poverty rate of above 40% or three times jurisdiction average, which in this case was 12%. So that's 36%. So, or you must have a popular nonwhite population of above 50%. So, if you fulfill those two conditions, a high poverty rate above 40 or 40%, or three times jurisdiction average and a non-white population of above 50%. The reason that we have an RCAP is if that non-white population is based on race, or an ECAP is that non-white population is basically non-Hispanic. So that's why they're

there two. We put these together our RCAP/ECAP. And we kind of blew up the map so you can see otherwise would be totally lost, see some our RCAP/ECAP areas, RCAP areas in Omaha and a couple in Lincoln. So, there's just, you know, showing us that we have some higher, you know, concentrations of poverty and non-white areas. So that's our RCAP/ECAP barriers, disparities in access to opportunity. So, these again, came out of the HUD AFH data set. That's why we're kind of doing the AI but through an AFH framework. That's where these come in, again, access to opportunity, they tried to measure a couple of different metrics, these metrics, ease about quality of life indicators, so they put them together. Quick note that these are a lot of these are very, you have to know what the definition is to get a get your head around them. They're relatively narrow in scope. So Just be aware of that. So also, one of the to normalize everything we're up is good. So, a high low poverty index is good. So, the higher low poverty you are, the better. low low poverty is not as good. So, school proficiency is up. School proficiency only evaluates the performance on fourth grade students on state exams has nothing to do with you know, high school graduation rates, college acceptance rates, anything like that. It's just fourth grade statewide tests. Okay, job proximity is kind of a function of us. This is job locations with a CBSA. Labor market and get engagement attempts to measure human capital in the neighborhood. Now, the two transportation costs indices, the low transportation costs and the transit trip costs only evaluate the transit costs or the transit trips for a three person, single parent family with incomes at 50% of the median income for renters. So, it's only renter households at 50% of the median family income that three persons, single family, parents, so mother or father and two kids living at 50% of the median income renting. And that's for low transit costs and transit trips. I think they wanted to do that because they wanted to dial in on the, the, you know, the portion of the population or the selection of the population that needs to use public transportation to get to where they need to go. They might not have a vehicle or might not be able to afford a vehicle. So that's why I think they're trying to just be so narrow on those two transportation costs in this transit, transportation costs and transit trips. Environmental Health summarizes potential exposure to harmful toxins and neighborhood level. But those are only airborne toxins based on EPA data, neurological, cancerous, and some other things in the air. Nothing to do with lead in your walls or letting your pipes. So, there's an indoor health hazards. It's an outdoor health hazard. So, HUD puts all of that together and they give each Census tract a score. And then, you know and have based on this and they also see, you know, what racial characteristics are in that Census tract. So, we do see here according to the disparities and access opportunity that, you know, there are some areas where African American households and Native American households are suffering disparity in access to opportunity. African American households are the orange yellow one, American Indian Native American households are the purple line. And we see here that the white non-Hispanic and Asian on Hispanics have relatively high low poverty Index, which is good and then we see African American, Hispanic and Native American having low lower poverty indices. School proficiency indices, fourth grade tests, only fourth grade tests, but it's data it is data points so we can evaluate it. And we see here that African households, Hispanic households and Native American households all have the disparity in access to school proficiency indices. Then we kind of see here again, in the labor market, same sort of trend where white households and Asian non-Hispanic households have a higher labor, labor force indices. But then things kind of switch where we get into transportation and transportation costs. White households' kind of fall below that African American and Hispanic, but Native American is still kind of low on those two, and we have jobs the job, human capital is kind of the same or that I think that's job, that's the core base statistic one. So that's just, you know, by jobs or not, that's all pretty relative. And then the hazard index, we do see that Native American households actually live in the cleanest air, they have the cleanest air according to this, white households also have, you know, low a higher hazard index, which is low hazard. Okay. So, you know, we do see some disparities and access to opportunity based on you know, racial or ethnic groups according to HUD AFFH dataset. Just want to make sure that I'm watching this make sure no one waves me okay cool or any questions like said if you have questions,

just type them into the question box and I will respond to them. Be happy to do that. Okay, so now when we look at these indices map, based on Census tract, we see here this is a low poverty Index. And we can kind of we overlaid them on the RCAP/ECAP areas. So, you can really see that they have a higher that low low poverty index, which is basically based on the poverty rate in the Census tract. So we do see we as we would expect to see low low poverty indices where RCAPs/ECAPs are here and here in Lincoln and here in Omaha, but we see relatively you know, the eastern part of the state and along the I-80 corridor have a high low poverty index, Which is good, it's better and then there's some, you know, the more rural swaths of North and the South, kind of a lower low poverty index here. School proficiency index. Again, we see here this is an overlaid on the RCAP/ECAP areas and we do see low low poverty school or low school proficiency index is in the RCAP/ECAP areas in Omaha. And also, the Lincoln doesn't look as bad to be honest, it's more kind of in the middle, we see here in the yellow for the Omaha region. But statewide, you know, we're looking at statewide, we do see some areas kind of on the western portions of the state with a lower low power, lower school proficiency index, and then kind of some mid high indices. They're kind of up here. So that's an interesting one. And on the kind of the outskirts of the urban area, we do see high school proficiency indexes. Labor market engagement index, pretty much statewide and the more rural everything outside of Omaha and Lincoln looks pretty purple and blue which in this map is good then we kind of dig into Omaha and Lincoln a little bit Omaha has some yellow again where those RCAPs/ECAPs are. So those are some areas that are you know lacking in access to opportunity and also high RCAP areas so concentration of non-white population as well as a higher poverty rate. So those are kind of the disparities and access to opportunity indices coming up through the AFH data set. We need to include that in because we're doing an AI through an AFH framework. so there we go. Disability, like I said most fair housing complaints are based in disability, lack of reasonable accommodation, different terms and conditions relating to rent, those kind of things, service animal type things could be there. We see here the disability rate The State of Nebraska as a whole is 11.5%. Male disability is 11.8% and female disability is 11.1%. We do see here that as you age, the rate of disability is much higher. So, once you get to 75 or older 47.4% of all population 75 or older has a disability. The way you get in this table up here is you have one of these disabilities down here. Hearing, vision, cognitive, ambulatory, self-care, and independent living. We do see here that ambulatory disability has the largest percent share of the total population. So, 5.9% of all persons in the State of Nebraska have an ambulatory disability, followed by independent living difficulty. So, if you look at ambulatory self-care and independent living, you can kind of see why the disability rate increases as you age in living independently becomes difficult as you get older. And so that's kind of why we see an increasing disability rate over as people age, yes, one thing to know a cognitive disability is not necessarily mean mental illness; mental illness is unfortunately not necessarily in this table. And okay, so this is the HMDA the data, Home Mortgage Disclosure Act. So anytime that you buy go, you go to try to buy a house and you go to the bank and you fill out a loan, a mortgage application, they're required by law to track that data. And you know, send it to a government agency. I think it's the I think it's now passing to the Consumer Finance Protection Agency. And then we as made available for detailed analysis. A fun note, if you're a data, the 2018 HMDA data set is way bigger than any, any other previous one just got a whole slew of new, you know, metrics that you can dig into. I haven't had a chance to do it yet. But I'm looking forward to it. Anyway, so this is home mortgage, Home Mortgage Disclosure Act data, but it's only looking at owner occupied single family, you know, houses. So, if you or if you are going to go into a bank to get a loan to buy a house to live in for yourself, that's what this data is looking at. This data also tracks refis. This data also tracks you know, investment, property, housing and that kind of thing. This data is only looking at data for you know, owner occupied home purchase single family loans. We see here over the 2008 to 2018 period; the average denial rates this denial rate is 9.5%. So, 9.5% of all applications were denied over this period. We also break it down by race. And we see here that the white households for white applications who came from what persons were 8.9%

compared to American Indian applications 14.5%, African American 15% so, these were much higher, maybe not much higher. They were certainly higher than the jurisdiction average of 9.5%. We see here Hispanic households that were attempting to get a home, home purchase loan or single family house were 15.1%. So, they almost had the highest besides this not available 15.3%. So, we do see some so this would point to some possibility, not necessarily. I wouldn't say discrimination in the home mortgage lending industry. I wouldn't go so far as to say that but maybe some disproportionate things and we do have tables about why these denial rates, why they're the reason that they were denied, and normally it's credit score and things like that. So sometimes you can get it sometimes you can get these numbers down a little bit if you just offer some homebuyer education courses, you know, strategies to increase your credit score, those kind of things. You know, just strategies to kind of get to bring your credit score up, no might bring these numbers down, actually, so some outreach and education.

Wrong way. All right. So fair housing complaints by basis. So anytime someone does feel like they have been discriminated against based on those protected classes that we saw at the beginning of the presentation, they have the right to file a fair housing complaint to HUD and HUD will track that down. we file a FOIA request to get the data from HUD. So, these are all fair housing complaints filed by basis from 2008 to 2019. I don't I don't think its calendar year, I think this probably goes to September, I'll have to take a look at the exact month the 2019 goes to, but we said let's include it. But like I was saying before, the most common, you know, basis of disability. So, basis means like what your fair house complaint was based on is disability 1,800 complaints were based on disability 1,100 we're based on race. You can have multiple bases. So, you can if you will are an African American disabled, a person was African American and disabled, you can file two, you know, basis. That's why we see total complaints higher, basis higher than total points followed by national origin. So that's normally Hispanic and then see some familiar status. So, you know, the issue so along with the issue you have the sorry along with the basis you have the issue with why was the thing that they were discriminating about. So, we see here that 1,700 of the issues and the largest issue was discrimination in terms conditions, privileges, relating to rental. So, a person with a protected class might have a different contract or different, you know, terms on their lease in a rental housing market than someone with a non-protected class. The second one was discriminated terms, conditions, privileges, services and facilities. So maybe parking or something, a communal pool or something that they couldn't access. And then the third is failure to make reasonable accommodation. And this one is, you know, if you have if you have a disability and you have the means to pay for reasonable accommodation in your unit, and you must return that unit to its original form as you leave, then and if the landlord denies that request, that's a fair housing issue. And there we go. The fourth is discriminatory acts under Section 18 coercion and discriminatory refusal to rent is the last one so they just flat out refused to rent to you if you're protected class. So um, these are the Fair Housing complaints by issues. Now we narrow that down we say okay, so that's those are the issues. That's what and those are the basis these are just the complaints filed, doesn't necessarily mean that they were found to have cause these are just that now these are the Fair Housing complaints found with cause, so they were conciliated or successfully mitigated. They were elected go to court, there's a couple different closure codes that we use to set, select out this table. But basically, there's something happening with your fair housing complaint there was found to have cause so something, something happened. And we see here 198 of all of those complaints were based in disability. So again, those were found to have with cause, follows closely, but are followed by race with 354 and the national origin at 249.

Okay, so those are fair housing complaints and caused by basis now we get into the survey. Let's find it. Okay. So, like said, if you haven't taken the survey, please do if you add thank you. Let's forward it on. Let's get let's get this. Let's just blow it up. It'll be awesome. But we have 160 responses, which to be

honest, is actually pretty good. Sometimes fair housing gets lost in the shuffle, especially during a consolidated planning process. You know, we have another survey running. So, take two surveys. You know, it might take some time, but thank you for taking the time to do that. So, we're 160 responses and that will hopefully only go up. We see primary role in the housing market. We have homeowners, local governments and advocates, housing advocates. How familiar are you with threat fair housing laws? You know, not familiar 24, somewhat familiar 58, very familiar 42. So that's actually pretty good. Missing is they didn't feel that way. Now, we have 160 total responses. Please assess the level of fair housing, outreach and education across the state? And we see here that a too little is 50. And don't know so people don't know if there's any outreach and education and they don't they feel like there's not enough. So, this kind of points to, you know, the additional need for outreach and education. I appreciate you being here on this webinar. Because that is, you know, in a sense, outreach and education. I hope you're learning something about fair housing in Nebraska. Please assess the current level of fair housing testing in the state again, too little 55. So, our Education and testing to see what's going on. Are you aware of any impediments to Fair Housing Choice in these areas? And we sorted them by Yes. So, the rental housing market, people who took the survey, 30 people took the survey, or were aware of impediments to rental housing market. If you haven't taken the survey, yet, there is a comment box so you can type in what those impediments are, and we read that, and we put that in document. The real estate industry was the second one, 23 and the mortgage home and lending industry. Now, we did see some higher denial rates based on you know, race and ethnicity in the HMDA data, so maybe some of the respondents are aware of specific instances where that kind of thing happened. Are you aware of any impediments or various a Fair Housing Choice in the state regarding and then we sorted again by yes, yeah. So, this is sorted by yes, limited access government services, such as lack of transportation and employment services, and I believe that has that might be a like an actual barrier requires a language barrier for so that would kind of fall under national origin. We have some immigrant populations that are cannot access government services or employment services because that's not in their language. That could be a fair housing or fair housing issue, or, you know, leases in their language. Neighborhood or community development policies, land use policies and zoning laws. So, these are kind of all these next three are, you know, laws or policies on the books that may be an impediment or barrier. And again, I hope they, you know, the people who filed that yes to this side of this specific instance or impediment that they were thinking about. That's super helpful. Do you think fair housing solids serve a useful purpose? 102 people said yes. So, there's tremendous buy in on fair housing laws, which is great. So, people think this over useful, useful purpose. They're happy that they're in the state. Are you aware of any educational outreach and education training opportunities? 53 people said yes, 39 people said no and 21 people said don't know. So, there is some people find it useful, and they are aware of educational activities. I mean, you all are on this call. So, I'm assuming you got looked into this through some sort of educational activity or opportunity. Do you think fair housing laws are difficult to understand or follow? Yes. 50 people said yes, no 45 and then don't know 29. So maybe again, this points to some additional outreach and education about fair housing laws and how to or what you can or cannot do. If people have, 45 people have indicated they participate in fair housing training, and you feel thousand laws are adequately enforced in the State of Nebraska. This one, most people don't know they don't know if there's actual outreach or enforcement or testing. Are you aware of any state fair housing ordinance or regulation or plan in Nebraska? No and don't know. So, I'd say, again, maybe some outreach and education about what the State of Nebraska is doing around fair housing. Are you aware of the state's policies and practicing firmly for furthering fair housing? Same sort of what is the top of the one before 34/38? Again, maybe we need to get the word out a little bit more about what's going on with fair housing in the state. Are you are there specific areas in the state that have fair housing problems? Most people said they don't know. But the 18 people that said, yes, I really hope they wrote down those specific areas and I'm sure they did. Because that, you know, if a couple if

we get if 18 people or 15 of those 18 people all wrote down in the same area, that's super helpful from an analysis standpoint.

That's why it's important to take the survey. Okay, so I'm going to this is the Fair Housing survey link, but I'm just going to put up this little primer because again, this is a public input webinar. So, if you have any public input, we'd love to hear it. You can type it into the question box up here or in the chat here, and then it will be transcribed automatically or if you'd like to speak, to say you can raise your hand. I think I unmuted everybody. So, you can feel free to talk as well or wave your hand. Now make sure you're unmuted. Um, let's see. Yes. So um, yeah, so what barriers to people having accessing housing? What groups of people have issues in accessing housing and what can the state do to help eliminate barriers and accessing housing? So, this, we were just acting about any input that you may have on fair housing issues, and here is the survey. I'm just going to leave that one up there. So, you guys can type it in right now. Because I know you're at a computer. Most of them I guess you could call this one in, there's some phones, some phone people here. Okay. And then, you know, if you have any thoughts, you can type them into the survey. So, I'll just kind of stay here for a little bit and answer any questions that pop up on this little question pane or wave your hand and maybe I can make sure to unmute you that kind of thing. Or we can all just have a most beautiful Thursday afternoon. It's totally up to you. Yeah. 117. So, yeah. And then kind of the next just fill you in on the next steps going forward. You know, we compile the survey results, the survey stays open, all the way almost until the final report. So, after the draft report, public review has been published, the survey is open. So are the state stays open. So, we compile this all together. And then we release the Final Report, I believe late February, early March. And then we have one more public input meeting. I hope, I'm pretty sure yeah, one more public input meeting in March. Side note, I will be at the housing, the NIFA housing marketplace. Sorry the NIFA Housing Conference in March. So, I hope you all can join, join us there as well for this and some other things that we do.

Ah question Thank you. How will all the data you have been collected and using the writing, Consolidated Plan and Annual Action Plan for the State of Nebraska? Okay, that's a good question. Thank you, Pamela. So, we are also simultaneously with an AI stuff that we have here we're doing a Consolidated Plan. And a Consolidated plan has, again, its own public input process. We did a Consolidated Plan webinar this morning. And we have another one if you're interested, next Thursday as well. So, join us for that. But the data that we use in the Fair Housing and the Con Plan is slightly different because the Consolidated Plan with just focusing on the non-entitlement areas of the state, so it's minus Bellevue Grand Island likes to Nebraska minus Grand Island, Bellevue, Lincoln and Omaha. So, this data set on the Fair Housing stuff, slightly different than the Consolidated Plan, and Consolidated Plan like I said, it has its own public input process and its own survey. So, you could take both surveys, it'd be awesome. So, I hope that answers your question. We're running a simultaneous public process and data collection process for that as well. And that's all going to be identified so that the Consolidated Plan survey is and public input process is based around, you know, Consolidated Plan, funding needs and things like that identifying housing needs, service needs, economic development needs. So that that's how we do that this kind of report is part of that process, but it's still slightly out slightly in its own domain, especially since we decided to kind of split the data into two separate scopes. So, hope that answers your question. Man, I like these question boxes. That's great. Okay. Anyone else? Chat question? Raise your hand. No. Okay. Okay, well I will just, I'm going to put my in the chat, I'm going to put my email, if you'd like a copy of the presentation, just please hit me up. And I will send it to you.

There's that. And then also, I hope you take a screenshot of that survey or type it in, bookmark it, so you can send it on. It's also available on the consolidated planning website as well. So that that's all there. And I'm looking forward to seeing everyone in March and, you know, sharing some findings about this

and the consolidated planning process. Great. So, next Thursday, we'll be doing it again. So, if you want to hear it again, we might update the survey results by then so that that could be fun if you want to, you know, hear what's going on in real time. Okay. No other questions? I just don't want I don't want to cut anyone off and look, unless they have a question everything. Okay. All right. Well, thank you so much for coming, quote unquote, coming to the Fair Housing webinar State of Nebraska. Like I said, check in next Thursday, we have Consolidated Plan and another one webinar. And if you if you'd like to hear some more, come back for those. Otherwise, we'll see you in March and keep an eye out for the draft reports of both the Con Plan and the AI Realized near or that around that. So, thank you so much for coming and I hope you have a wonderful weekend. Happy Thursday.

Analysis of Impediments Public Input Meeting

Presentation

Comment: So, on the Lincoln one there is just a little blurb there?

Presenter: Two little RCAPs and ECAPs. They have to qualify for both conditions.

Presentation

Comment: I don't know where it fits in, but there's language barriers, especially in this part of Nebraska with our high immigration population. I think that's a barrier; I don't necessarily intentional.

Presenter: Yeah. Yeah, I could see that. So like, you know, like, Hispanic or Spanish language application forms, things like that.

Comment: It is more like Arabian and like...

Presenter: Okay. Yeah. So now so that that would fall under the protected class of national origin. So barriers, language barriers. Yeah, thank you. Especially like literature. We did have a Spanish language survey.

Comment: Right, like, we're converting all of our stuff into all different languages.

Presenter: So increase, you know, increasing the amount of languages. Hopefully you lower the barrier, the language barrier. Okay, yeah. Because there is a there's a data topic in the HUD AFH called the place of birth. Place of birth, so we do have that data. So I'm going to take a look at that.

Comment: Okay, I'm just trying to think of what we hear in the community and I don't know that it's necessarily these renters, fair housing for renters and concerns and renters don't know what their rights are. They feel like there's, they complain they get kicked out or their rent gets braised up. I don't know if that fits in with fair housing.

Presenter: Yeah, it's fair housing. It's an interesting thing because I've heard a lot about evictions, you know, like being people being kicked out, and then they're on the street and then they can't get back in to a house because now they're, you know, homeless. And you are right, so that that's the those aren't necessarily a protected class. You know, I've heard a lot of, like criminal history is not it's not a protected class, although it probably should be, you know, that that's the stigma, source of income is not a protected class. But that's, you know, I don't know if it should be is not my place to say but those are things I have heard.

Comment: It almost needs to be exclusionary housing rather than fair housing. That's what I think we're being faced with.

Presenter: So inclusionary, you mean, set aside 20, like a certain percentage of, of a building for affordable housing.

Comment: Right. It was mentioned this morning. And you know, it's not just the homeless, there's all the different levels of rentals that are needed.

Presenter: Yeah, and it and that's, that's where fair housing gets really tricky, because affordable housing isn't necessarily a fair housing issue. But there's a lot of feedback, but between them, you know,

I mean, you know, it's, it's not necessarily being not able to live in a penthouse or whatever, it's just being able to afford your rent. And when we talk about disproportionate housing needs, based on race when we see protected classes, several protected classes that have a higher level of housing cost burden. You know, it's a very it's a very complicated issue, you know, because you could decrease, it could decrease that burden by increasing the stock of affordable housing.

Comment: So, times have changed. It used to be they were discriminated against because of your race. You weren't even shown houses in parts of town or you weren't able to get insurance, or the banks wouldn't give you mortgages. Now, it's just all changed. You don't see that as much as the disparities.

Presenter: Yes, I agree. And how to address that is it's very complicated,

Comment: Right and that is what makes it hard when we're doing our grants and doing our fair housing. What are we doing, a lot of this is marketing because it's very hard to identify them. So it's not just based on people complaining anymore.

Nebraska Analysis of Impediments Public Input Meeting

Presentation

Thank you so much for joining me for the 2020 State of Nebraska Analysis to Impediments of AI or Analysis of Impediments to Fair Housing Choice for the kind of the part of the whole consolidated planning process. We're in Lincoln last week doing this very same presentation. We had some good comments and we hope to hear some excellent comments from you. Everything that I have in this presentation, which will be made available on the website, or you can send me an email and I'll forward you a copy after this will be already in the report. So really, the main purpose of this today's meeting is to share some preliminary findings and hear of any concerns that you may have, or comments or, you know, insights into barriers and Fair Housing Choice, like said, if you write them down on the question they'll show up there or the chat or you know, you can feel free to just speak up. I believe this is all being recorded as well. So that's full disclosure, full disclosure. All right. So, like I said, the intent of this meeting is to review some fair housing protections, introduce you to the Affirmatively Furthering Fair Housing rule and its immediate demise or nearly immediate demise. Show some fair housing data and maps, gain some input on the perspective to help shape the AI draft plan and emphasize the 2019 or 2020 now, fair housing survey. If you haven't taken the survey, please do. We'll have the survey link for you here. And if you have taken the survey, thank you so much forward it on to your friends, your family, those in your professional network, anyone that you know, anyone living in Nebraska that might have some input, or just like to learn a little bit more about fair housing.

So fair housing protections, Federal and State Fair Housing Acts protect several groups and housing transaction. Federal Rules are federal protected classes race, color, national origin, religion, gender, familiar or marital status and disability. There are several other states across the country or jurisdictions that have additional protected classes, but these are the ones that are protected in Nebraska. I have heard throughout my travels that this list is too short things that I have heard that that have expressed need, and you may or may not agree with them our source of income I have heard as a protected class. So, Housing Choice vouchers, section 8 recipients that is currently not protected. Veteran status I've heard should be a protected class and returning citizens or those with a criminal history, often faced housing problems or you know, issues in securing housing. Those currently are not a protected class. If you believe they should be, we can, you know, add it to the comment, I just those are the most the most common additional protected classes that I have heard throughout my travels.

But this is what we have in Nebraska as of today. So, State of Nebraska Analysis to Impediments to Fair Housing, this is a statewide report if you are at my earlier webinar or saw me in Lincoln, the Consolidated Plan, which is kind of this is kind of a part of is just the non-entitlement areas of the state. All the data in this presentation and actually in the AI report itself will be statewide data because fair housing is a statewide issue, especially in a couple of Omaha and Lincoln has some RCAP/ECAP areas that we'll see a little bit later in the presentations, however, so entitlement jurisdictions receive federal funding from HUD must certify that they are Affirmatively Furthering fair housing as a condition to receive grants. So, it's kind of part of the consolidated planning process, outside of that a little bit but it has to be filed at the same time. So, over the past 20 years, AFH meant preparing and Analysis to Impediments to Fair Housing Choice in AI. You conducted in AI, you identified barriers to Fair Housing Choice, and you took actions on those impediments if any impediments or barriers were found, and you maintain records of those actions. In 2015, HUD rolled out a thing called the AFFH. And part of this AFFH thing, they changed a couple of the language, we have local knowledge, identify fair housing issues instead of barriers and contributing factors to those issues instead of impediments and we prioritize fair housing goals. Part of this whole AFFH rollout is a HUD use this on created an online assessment tool

with all the data that anyone or jurisdiction should be able to use to identify fair housing issues and contributing factors.

There was a couple issues with the data set number one and it relies heavily on the 2009 to 2013, American Community Survey data, those of us who were around then I'm guessing all of us were because that was wasn't too long ago that is the height of the Great Recession. So, the 2009 to 2013 ACS data shows a starkly different landscape, economic demographic housing landscape them where we find ourselves today. Also use the 2009 to 2013 CHAS data, Comprehensive Housing Affordability Strategy data set. Again, that's a very different time and you know, economic demographic housing trends that we find ourselves in today. So, what we did is we reverse engineered all the data, we are able to, to, you know, manufacturer reverse engineer in the HUD AFFH data set using the most recent Census data and the most recent CHAS data. So, we use the AFFH you know, data frameworks, but with the most recent data, except for a couple indices. That we'll see here that we had to use the original AFFH dataset. So, the operating context is a fair housing issue is a condition that restricts Fair Housing Choice or access to opportunity. Alongside this AFH data set roll out they had this kind of new concept called access to opportunity, and they were trying to measure those are fair housing issues. So, access opportunities, kind of quality of life there. They're trying to get a quality of life metrics ease and how those may vary based on race or ethnicity. Contributing factor creates contributes to or perpetuates increases the severity of fair housing issues that were identified in the first one, and a fair housing goal or things that are committed to and must be done for the AFFH required. Okay, so they put all that out. It was supposed to be easy for jurisdictions to do themselves, but it wasn't, it was rather confusing. A lot of the concepts that they tried to, you know include in this data set are just a little confusing, especially for the general population there took me a little while to get my head around as well. I'll walk you through a lot of those. So, they decided to suspend the rule. So, until further notice, and they have put out a notice that they actually might just completely get a do away with all these things. But where we are now, we have to do an AI we have to file that the old way of Analysis to Impediments to Fair Housing Choice identifying impediments, but we have to do it through an AFH framework. So, we have to include these as these additional AFFH data concepts that were put out in this online assessment tool. And we'll work through we'll work through what those are and what they look like.

So, the AI/AFFH report will have an executive summary and we'll talk about the community participation process of which now you are involved in which is great, thank you so much for showing up. We were also like I said in Lincoln doing the same presentation last week, we had some great comments and great turnout there. We also have a fair housing survey running the second time I said it, I'll say it at least 10 more times. If you haven't taken it, please do if you have thank you, forward it on. We look at past goals and actions and we kind of see what's going on. And we have analysis and we develop goals and priorities and any tendencies if we need them. The community participation process, like I mentioned to is we have a fair housing survey. We had a fair housing forum, and we're having professional fair housing focus groups we're at now and then there'll be a public review meeting in March. So, keep your ear out for that one. So, after the initial findings and all the analysis and public input have been, you know, coalesced and distilled down into factors and recommended actions, we come back and we share them with the public and offer one additional opportunity for people to chime in on. So, HUDs fair housing issues, here we have seven of them are segregation analysis. They try to quantify this through what is known as the dissimilarity index will run through that in a further slide, RCAP and ECAP area. So, RCAP stands for up here racially concentrated areas of poverty and ethnically concentrated areas of poverty. And the United States Census as we'll see in a bit, you have a race and ethnicity. So, they separate them out disparities and access to opportunity. And those are the based on the several indices in the AFFH data set. That unfortunately, we were unable to recreate everything else we were able to redo except

for these access to indices, but we'll work through them later in the presentation as well. Disproportionate housing needs relies on the CHAS community or Comprehensive Housing Affordability Strategy dataset that is produced by HUD for the consolidated planning purpose. It's a special tabulation from the US Census Bureau and pays the Census. So, I don't know how that all works, but it comes out and it's a big, big lot of the tables, C is for comprehensive. So, we'll walk through that, but it shows housing needs by several you know, household characteristics, one of which is race. So, we can see if there's a racial or ethnic breakdowns that are experiencing disproportionate housing needs. We look at publicly where the publicly supported housing is. Is it clustered in RCAP/ECAP areas? Is it not? We look at disability and access analysis. A lot of people think about fair housing as based in race, fair housing complaints, you know, when they're filed, or actually the majority of them are file with a basis in disability, folks, persons with a disability that can, you know, reasonably accommodate their dwelling units or something like that. There's a lot of a lot of fair housing issues actually, in the, you know, our disability are based in disability, as we'll see later, and fair housing enforcement, outreach, etc. So, these are the issues that we're going to work through the purpose of today's meeting, we review some socio economic context, we present a bunch of data. We do a lot of data analysis based on the Census and the AFFH data set and the CHAS data excuse me, we look at segregation and RCAP/ECAPs, discussed disparities and opportunity discuss disability and address fair housing enforcement and outreach. Like I said, this is a statewide report. Instead, the Consolidated Plan that we were focusing on earlier is not entitlement areas. This is the state wide as a whole. And we see a pretty decent, you know, almost linear population growth rate. For the State of Nebraska, it's good to go up population growth is a good thing. So that's so that's good slide.

And here we go population by race, race and ethnicity, 2010 Census and the 2017, five year American Community Survey. So anytime you see a table like this, we just I just want to walk you through how to actually read this table. Since so this is the 2010 Census. The Census is a count of all the people in the country or your city or everything. It's a total count. A 2017 five year American Community Survey is a survey. So, it's a sample size, they send out forms and people fill the forms back in and they send it out. So, the methodologies are different. Because the methodology between the two are different, you can't actually compare the numbers between the two time periods. So, you can't actually look at the population in 2010, compared to the population in 2017, five year ACS, but what you can do is you can look at the percentage of total and compare those across the two time periods. So, we see here the white population in the State of Nebraska, rose from 86.1% of the population to 87.8% of the population, African American household or birth population also rose from 4.5 to 4.7%. And then we see here non-Hispanic and Hispanic because in the United States Census, you have a race and an ethnicity. So, you can identify as white, non-Hispanic, white, Hispanic, black, non-Hispanic, black, Hispanic, so you have both a HUD, the CHAS dataset that actually puts them together, which is a little confusing. We'll talk about that later on. We see here that Hispanic households also increased from 9.2 to 10.5% of the population. So, breaking over 10% in the most recent 2017 five year ACS. Now when you take the Census or the American Community Survey, they summit together and what are known as summary levels, some levels, the very smallest geographic area and the Census is called the block and that corresponds to a city block; city blocks are pretty small. So, they add those up together, they add a bunch of groups of city blocks together to make a block group. Block Groups are also still pretty small. So, they added up to one more level. See if I can get into the camera there, we go to Census tract level. Now this is a map of Census tracts. Census tracts are also they add the blocks and block groups together, they try to get a roughly equivalent population in the size of Census tract. So that's why you see, you know, Census tracts and more rural less popular, less sparsely more sparsely populated areas having larger Census tracts, you know, some counties only have two Census tracts, when we get into Omaha or Lincoln, density, denser population Census tracts are much, much smaller to kind of equate the

population size to across the two. So here a percentage of concentration of white households. You know, overall, we're seeing 87.8% of all population in Nebraska are white, so this white population, there are some pockets reaching 99.1 to 100% white population. There are some notable the notable thing about this maps are the lower levels where we have less concentrations white population here and over here. And then we'll see about that. African American population concentrated pretty heavily in just more urbanized areas. Omaha it's kind of hard to see in Lincoln and along the I-80 corridor, Hispanic population also there's a couple pockets of higher kind of concentrated Hispanic population. The blue purple is 49.8 to 80.2% of all persons in those Census tracts are Hispanic. So that's actually a pretty big concentration area. You can see some here. They're kind of hard to see on a statewide map. But there we go. Don't have American Indian. Oh my goodness. I don't know why we don't have American Indian in here, but I can show like these two Census tracts up here are high concentrations of American Indian population as well. And also, on the border up here with the reservation. Okay, so uh, oh, things are going crazy. Alright. This is a poverty by age in the 2010 Census, they did not ask about your income. They decided to take the income question out of the Census and put it in the American Community Survey with the idea that it would roll every year. They changed the poverty question and the ACS data. So, they we will so they weren't able to we weren't able to get anything besides the most recent ACS stuff, and the 2000 Census, unfortunately. Here we see a percentage of population in poverty for the entire state rose from 9.7 to 12%. That's pretty big time period. A lot happened between then and there. So, it's not too surprising that we see a poverty rate increase, although that rate isn't increasing too high compared to other places that I've seen. Concentrations of poverty throughout the state against Census tract level mapping. We see here some higher concentrations, and this is this does have some higher concentrations of Native American Indian households there. You can probably you probably can't see it, because we have the sign there, but they're also high concentrations, you know. Housing units by tenure. Okay, how you read this chart, this is kind of a nested table we see occupied plus vacant equals total housing units. Total housing unit is a physical housing structure. It's a single family unit, apartment, mobile home. triplex duplex whatever you can live in it a boat. That's cool. That's in there. I did here. And Nebraska has the largest coastline of rivers out of all the states in the country. That's the word on the street. Anyway, so once you move into a housing unit it becomes occupied, or a household, which is up here and then if it's occupied is either renter occupied, or owner occupied. So, we see here that the percentage share of owner occupied housing fell slightly from 67.2 to 66%, of the total of all occupied housing units households, commercially, the renter occupied household rose from 32.8 to 34%. This is the 2017 five year American Community Survey. So, it's averages over the last five years. So we do see, you know, it's still got a little bit of the post-recession or a little tail end of the recession, post-recession recovery, and we did see over that period of people switching slightly from single family to rental units, however, so that that's why we kind of see that that bit of a shift there. Vacant housing units fell actually from 9.5 to 9.2% of the total housing stock in the state. So that that's good to see that fall, households by income. Now, we do see here that the income of the households actually, you know, we do see less than 15,000 fell from 12.2 to 10.1%. And then that trend kind of continues, most of the lower income household's kind of fell. And then we see here at the very top end 75 to 99 rose from 12.8 to 13.4, and \$100,000 or more rose, pretty big actually 16% to 22.9% of the household. So, we do see incomes or at least income bracket, household incomes rising as percentage share the total population. However, this data is not adjusted for inflation, so dollars over here on the 2017, five year Americans you survey are worth less than the dollar is in the 2010 five your ACS. So that inflation certainly plays a role in that, you know, increasing cost of living and things like that, but not that big of a jump, and that that's a pretty big percentage jump up for that for that income breakdown. Okay, households by year home built and we see here the majority are, you know, there is a couple years where housing stock was built first 1939 or older, counts for a 20.2% so roughly a fifth of all housing stock in Nebraska was built before 1939. And we see another kind of big building year well 1960

to 79 if you put those together, that's also pretty big 1979, 16.3% of the housing stock was built their cc so a lot of stuff built before 1939 from the 60s to the 80s or 1979 also kind of a big, a big one. And then we see some additional units are bigger units built in 1990, 1999, and 2000, then 2009 11.9 and 12% of the Nebraska housing stock. So, we see a couple of clusters of decades where we see some bigger housing stock built. So this is owner occupied by median family and we see here, you know, so just remember, one fifth was building 30 in the 30s, or earlier 60s, 70s and 2000. So, we see here, the earlier stuff 1939, the majority, majority fifth the housing stock had a median value of about \$92,000. When we kind of go down as the, you know, the year structure build increases, so does a median value. So, we see another kind of bigger year in 1979, \$141,000 was the median value, then we kind of go up again and we see the 2000 to 2009, \$227,000 and things are kind of really increasing but it's time to get to 2014 or later. median value of a structure bill was up to \$330,000. So that's a that's a quite a big increase as so basically as the newer structures are built, newer units are normally bigger, and they command a higher premium. Okay, so now we're diving into HUD AFFH land. This is a what is known as the dissimilarity index. This came out of that HUD AFH online interactive or online assessment tool that they put together. It's a way of measuring or you know, there is a way of measuring segregation according to HUD, what it actually measures is how, how a lower level geography, how similar or dissimilar, a lower level area compares to a higher level area. That's why it's called the dissimilarity index and the legend they use the dissimilarity index and convert it then to segregation. Okay. The formula that you use is over here on the right if that's not your thing, don't worry, it's my thing. That's why I'm here pointing at it. Basically, it's you know, it evaluates how smaller level areas, in this case Census tracts, compared to the State of Nebraska. I just want to point out here that this equation is very sensitive to this i here we chose a Census tracts j, the state, if this I was a block group or a block, immediately you get higher segregation boundaries, instead of we decided and this is statewide analysis, maybe Census tracts are too small, we should just use counties. You know, there's 93 counties in Nebraska, we can do that. The segregation would immediately decrease because most counties look almost identical to the state. So, we do Census tracts and happy median. It's just highly sensitive to that. I just wanted to point that out. We do, however, see once we run the numbers that African American households have a dissimilarity index rate of above 60, which corresponds according to HUD to high segregation, but between 2010 and most recent 2017 ACS we do see a decrease, slight decrease in the dissimilarity index. We also see an American Indian households, we do see an increase rising from above 50, which is, you know, in the moderate segregation area, almost a 60. So according to the similarity index, we see increasing levels of segregation among American Indian Native American households. Hispanic households, moderate levels of segregation were about, you know, under 50. This between this 40 and 54, down here moderate levels of segregation, and that remained pretty constant over the 2010 to 2017 five year ACS. So, quick recap was the slight decrease, I mean, highly segregated African American populations but decreasing. Increasing American Indian segregated populations and Hispanics, moderately segregated but remaining the same. According to this according to the dissimilarity index put out by HUD. RCAPs and ECAPs we see here our RCAP is a racially concentrated area poverty and ECAP is an ethnically concentrated areas of poverty. This again comes out of the AFH dataset, excuse me, and the equation to determine if your RCAP or ECAP is down here. Again, that's not your thing, don't worry. It basically says you have to fill two conditions Census tract must fulfill two conditions to become an archive RCAP/ECAP, the first of which is you have to have a poverty rate of above 40% or three times jurisdiction average, which in this case was 12%. So that's 36%. So, or you must have a popular nonwhite population of above 50%. So, if you fulfill those two conditions, a high poverty rate above 40 or 40%, or three times jurisdiction average and a non-white population of above 50%. The reason that we have an RCAP is if that non-white population is based on race, or an ECAP is that non-white population is basically non-Hispanic. So that's why they're there two. We put these together our RCAP/ECAP. And we kind of blew up the map so you can see otherwise would be totally lost, see some our RCAP/ECAP areas, RCAP areas in Omaha and a couple in

Lincoln. So, there's just, you know, showing us that we have some higher, you know, concentrations of poverty and non-white areas. So that's our RCAP/ECAP barriers, disparities in access to opportunity. So, these again, came out of the HUD AFH data set. That's why we're kind of doing the AI but through an AFH framework. That's where these come in, again, access to opportunity, they tried to measure a couple of different metrics, these metrics, ease about quality of life indicators, so they put them together. Quick note that these are a lot of these are very, you have to know what the definition is to get a get your head around them. They're relatively narrow in scope. So Just be aware of that. So also, one of the to normalize everything we're up is good. So, a high low poverty index is good. So, the higher low poverty you are, the better. low low poverty is not as good. So, school proficiency is up. School proficiency only evaluates the performance on fourth grade students on state exams has nothing to do with you know, high school graduation rates, college acceptance rates, anything like that. It's just fourth grade statewide tests. Okay, job proximity is kind of a function of us. This is job locations with a CBSA. Labor market and get engagement attempts to measure human capital in the neighborhood. Now, the two transportation costs indices, the low transportation costs and the transit trip costs only evaluate the transit costs or the transit trips for a three person, single parent family with incomes at 50% of the median income for renters. So, it's only renter households at 50% of the median family income that three persons, single family, parents, so mother or father and two kids living at 50% of the median income renting. And that's for low transit costs and transit trips. I think they wanted to do that because they wanted to dial in on the, the, you know, the portion of the population or the selection of the population that needs to use public transportation to get to where they need to go. They might not have a vehicle or might not be able to afford a vehicle. So that's why I think they're trying to just be so narrow on those two transportation costs in this transit, transportation costs and transit trips. Environmental Health summarizes potential exposure to harmful toxins and neighborhood level. But those are only airborne toxins based on EPA data, neurological, cancerous, and some other things in the air. Nothing to do with lead in your walls or letting your pipes. So, there's an indoor health hazards. It's an outdoor health hazard. So, HUD puts all of that together and they give each Census tract a score. And then, you know and have based on this and they also see, you know, what racial characteristics are in that Census tract. So, we do see here according to the disparities and access opportunity that, you know, there are some areas where African American households and Native American households are suffering disparity in access to opportunity. African American households are the orange yellow one, American Indian Native American households are the purple line. And we see here that the white non-Hispanic and Asian on Hispanics have relatively high low poverty Index, which is good and then we see African American, Hispanic and Native American having low lower poverty indices. School proficiency indices, fourth grade tests, only fourth grade tests, but it's data it is data points so we can evaluate it. And we see here that African households, Hispanic households and Native American households all have the disparity in access to school proficiency indices. Then we kind of see here again, in the labor market, same sort of trend where white households and Asian non-Hispanic households have a higher labor, labor force indices. But then things kind of switch where we get into transportation and transportation costs. White households' kind of fall below that African American and Hispanic, but Native American is still kind of low on those two, and we have jobs the job, human capital is kind of the same or that I think that's job, that's the core base statistic one. So that's just, you know, by jobs or not, that's all pretty relative. And then the hazard index, we do see that Native American households actually live in the cleanest air, they have the cleanest air according to this, white households also have, you know, low a higher hazard index, which is low hazard. Okay. So, you know, we do see some disparities and access to opportunity based on you know, racial or ethnic groups according to HUD AFFH dataset. Just want to make sure that I'm watching this make sure no one waves me okay cool or any questions like said if you have questions, just type them into the question box and I will respond to them. Be happy to do that. Okay, so now when we look at these indices map, based on Census tract, we see here this is a low poverty Index. And

we can kind of we overlaid them on the RCAP/ECAP areas. So, you can really see that they have a higher that low low poverty index, which is basically based on the poverty rate in the Census tract. So we do see we as we would expect to see low low poverty indices where RCAPs/ECAPs are here and here in Lincoln and here in Omaha, but we see relatively you know, the eastern part of the state and along the I-80 corridor have a high low poverty index, Which is good, it's better and then there's some, you know, the more rural swaths of North and the South, kind of a lower low poverty index here. School proficiency index. Again, we see here this is an overlaid on the RCAP/ECAP areas and we do see low low poverty school or low school proficiency index is in the RCAP/ECAP areas in Omaha. And also, the Lincoln doesn't look as bad to be honest, it's more kind of in the middle, we see here in the yellow for the Omaha region. But statewide, you know, we're looking at statewide, we do see some areas kind of on the western portions of the state with a lower low power, lower school proficiency index, and then kind of some mid high indices. They're kind of up here. So that's an interesting one. And on the kind of the outskirts of the urban area, we do see high school proficiency indexes. Labor market engagement index, pretty much statewide and the more rules everything outside of Omaha and Lincoln looks pretty purple and blue which in this map is good then we kind of dig into Omaha and Lincoln a little bit Omaha has some yellow again where those RCAPs/ECAPs are. So those are some areas that are you know lacking in access to opportunity and also high RCAP areas so concentration of non-white population as well as a higher poverty rate. So those are kind of the disparities and access to opportunity indices coming up through the AFH data set. We need to include that in because we're doing an AI through an AFH framework. so there we go. Disability, like I said most fair housing complaints are based in disability, lack of reasonable accommodation, different terms and conditions relating to rent, those kind of things, service animal type things could be there. We see here the disability rate The State of Nebraska as a whole is 11.5%. Male disability is 11.8% and female disability is 11.1%. We do see here that as you age, the rate of disability is much higher. So, once you get to 75 or older 47.4% of all population 75 or older has a disability. The way you get in this table up here is you have one of these disabilities down here. Hearing, vision, cognitive, ambulatory, self-care, and independent living. We do see here that ambulatory disability has the largest percent share of the total population. So, 5.9% of all persons in the State of Nebraska have an ambulatory disability, followed by independent living difficulty. So, if you look at ambulatory self-care and independent living, you can kind of see why the disability rate increases as you age in living independently becomes difficult as you get older. And so that's kind of why we see an increasing disability rate over as people age, yes, one thing to know a cognitive disability is not necessarily mean mental illness; mental illness is unfortunately not necessarily in this table. And okay, so this is the HMDA the data, Home Mortgage Disclosure Act. So anytime that you buy go, you go to try to buy a house and you go to the bank and you fill out a loan, a mortgage application, they're required by law to track that data. And you know, send it to a government agency. I think it's the I think it's now passing to the Consumer Finance Protection Agency. And then we as made available for detailed analysis. A fun note, if you're a data, the 2018 HMDA data set is way bigger than any, any other previous one just got a whole slew of new, you know, metrics that you can dig into. I haven't had a chance to do it yet. But I'm looking forward to it. Anyway, so this is home mortgage, Home Mortgage Disclosure Act data, but it's only looking at owner occupied single family, you know, houses. So, if you or if you are going to go into a bank to get a loan to buy a house to live in for yourself, that's what this data is looking at. This data also tracks refis. This data also tracks you know, investment, property, housing and that kind of thing. This data is only looking at data for you know, owner occupied home purchase single family loans. We see here over the 2008 to 2018 period; the average denial rates this denial rate is 9.5%. So, 9.5% of all applications were denied over this period. We also break it down by race. And we see here that the white households for white applications who came from what persons were 8.9% compared to American Indian applications 14.5%, African American 15% so, these were much higher, maybe not much higher. They were certainly higher than the jurisdiction average of 9.5%. We see here

Hispanic households that were attempting to get a home, home purchase loan or single family house were 15.1%. So, they almost had the highest besides this not available 15.3%. So, we do see some so this would point to some possibility, not necessarily. I wouldn't say discrimination in the home mortgage lending industry. I wouldn't go so far as to say that but maybe some disproportionate things and we do have tables about why these denial rates, why they're the reason that they were denied, and normally it's credit score and things like that. So sometimes you can get it sometimes you can get these numbers down a little bit if you just offer some homebuyer education courses, you know, strategies to increase your credit score, those kind of things. You know, just strategies to kind of get to bring your credit score up, no might bring these numbers down, actually, so some outreach and education.

Wrong way. All right. So fair housing complaints by basis. So anytime someone does feel like they have been discriminated against based on those protected classes that we saw at the beginning of the presentation, they have the right to file a fair housing complaint to HUD and HUD will track that down. we file a FOIA request to get the data from HUD. So, these are all fair housing complaints filed by basis from 2008 to 2019. I don't I don't think its calendar year, I think this probably goes to September, I'll have to take a look at the exact month the 2019 goes to, but we said let's include it. But like I was saying before, the most common, you know, basis of disability. So, basis means like what your fair house complaint was based on is disability 1,800 complaints were based on disability 1,100 we're based on race. You can have multiple bases. So, you can if you will are an African American disabled, a person was African American and disabled, you can file two, you know, basis. That's why we see total complaints higher, basis higher than total points followed by national origin. So that's normally Hispanic and then see some familiar status. So, you know, the issue so along with the issue you have the sorry along with the basis you have the issue with why was the thing that they were discriminating about. So, we see here that 1,700 of the issues and the largest issue was discrimination in terms conditions, privileges, relating to rental. So, a person with a protected class might have a different contract or different, you know, terms on their lease in a rental housing market than someone with a non-protected class. The second one was discriminated terms, conditions, privileges, services and facilities. So maybe parking or something, a communal pool or something that they couldn't access. And then the third is failure to make reasonable accommodation. And this one is, you know, if you have if you have a disability and you have the means to pay for reasonable accommodation in your unit, and you must return that unit to its original form as you leave, then and if the landlord denies that request, that's a fair housing issue. And there we go. The fourth is discriminatory acts under Section 18 coercion and discriminatory refusal to rent is the last one so they just flat out refused to rent to you if you're protected class. So um, these are the Fair Housing complaints by issues. Now we narrow that down we say okay, so that's those are the issues. That's what and those are the basis these are just the complaints filed, doesn't necessarily mean that they were found to have cause these are just that now these are the Fair Housing complaints found with cause, so they were conciliated or successfully mitigated. They were elected go to court, there's a couple different closure codes that we use to set, select out this table. But basically, there's something happening with your fair housing complaint there was found to have cause so something, something happened. And we see here 198 of all of those complaints were based in disability. So again, those were found to have with cause, follows closely, but are followed by race with 354 and the national origin at 249.

Okay, so those are fair housing complaints and caused by basis now we get into the survey. Let's find it. Okay. So, like said, if you haven't taken the survey, please do if you add thank you. Let's forward it on. Let's get let's get this. Let's just blow it up. It'll be awesome. But we have 160 responses, which to be honest, is actually pretty good. Sometimes fair housing gets lost in the shuffle, especially during a consolidated planning process. You know, we have another survey running. So, take two surveys. You

know, it might take some time, but thank you for taking the time to do that. So, we're 160 responses and that will hopefully only go up. We see primary role in the housing market. We have homeowners, local governments and advocates, housing advocates. How familiar are you with threat fair housing laws? You know, not familiar 24, somewhat familiar 58, very familiar 42. So that's actually pretty good. Missing is they didn't feel that way. Now, we have 160 total responses. Please assess the level of fair housing, outreach and education across the state? And we see here that a too little is 50. And don't know so people don't know if there's any outreach and education and they don't they feel like there's not enough. So, this kind of points to, you know, the additional need for outreach and education. I appreciate you being here on this webinar. Because that is, you know, in a sense, outreach and education. I hope you're learning something about fair housing in Nebraska. Please assess the current level of fair housing testing in the state again, too little 55. So, our Education and testing to see what's going on. Are you aware of any impediments to Fair Housing Choice in these areas? And we sorted them by Yes. So, the rental housing market, people who took the survey, 30 people took the survey, or were aware of impediments to rental housing market. If you haven't taken the survey, yet, there is a comment box so you can type in what those impediments are, and we read that, and we put that in document. The real estate industry was the second one, 23 and the mortgage home and lending industry. Now, we did see some higher denial rates based on you know, race and ethnicity in the HMDA data, so maybe some of the respondents are aware of specific instances where that kind of thing happened. Are you aware of any impediments or various a Fair Housing Choice in the state regarding and then we sorted again by yes, yeah. So, this is sorted by yes, limited access government services, such as lack of transportation and employment services, and I believe that has that might be a like an actual barrier requires a language barrier for so that would kind of fall under national origin. We have some immigrant populations that are cannot access government services or employment services because that's not in their language. That could be a fair housing or fair housing issue, or, you know, leases in their language. Neighborhood or community development policies, land use policies and zoning laws. So, these are kind of all these next three are, you know, laws or policies on the books that may be an impediment or barrier. And again, I hope they, you know, the people who filed that yes to this side of this specific instance or impediment that they were thinking about. That's super helpful. Do you think fair housing solids serve a useful purpose? 102 people said yes. So, there's tremendous buy in on fair housing laws, which is great. So, people think this over useful, useful purpose. They're happy that they're in the state. Are you aware of any educational outreach and education training opportunities? 53 people said yes, 39 people said no and 21 people said don't know. So, there is some people find it useful, and they are aware of educational activities. I mean, you all are on this call. So, I'm assuming you got looked into this through some sort of educational activity or opportunity. Do you think fair housing laws are difficult to understand or follow? Yes. 50 people said yes, no 45 and then don't know 29. So maybe again, this points to some additional outreach and education about fair housing laws and how to or what you can or cannot do. If people have, 45 people have indicated they participate in fair housing training, and you feel thousand laws are adequately enforced in the State of Nebraska. This one, most people don't know they don't know if there's actual outreach or enforcement or testing. Are you aware of any state fair housing ordinance or regulation or plan in Nebraska? No and don't know. So, I'd say, again, maybe some outreach and education about what the State of Nebraska is doing around fair housing. Are you aware of the state's policies and practicing firmly for furthering fair housing? Same sort of what is the top of the one before 34/38? Again, maybe we need to get the word out a little bit more about what's going on with fair housing in the state. Are you are there specific areas in the state that have fair housing problems? Most people said they don't know. But the 18 people that said, yes, I really hope they wrote down those specific areas and I'm sure they did. Because that, you know, if a couple if we get if 18 people or 15 of those 18 people all wrote down in the same area, that's super helpful from an analysis standpoint.

That's why it's important to take the survey. Okay, so I'm going to this is the Fair Housing survey link, but I'm just going to put up this little primer because again, this is a public input webinar. So, if you have any public input, we'd love to hear it. You can type it into the question box up here or in the chat here, and then it will be transcribed automatically or if you'd like to speak, to say you can raise your hand. I think I unmuted everybody. So, you can feel free to talk as well or wave your hand. Now make sure you're unmuted. Um, let's see. Yes. So um, yeah, so what barriers to people having accessing housing? What groups of people have issues in accessing housing and what can the state do to help eliminate barriers and accessing housing? So, this, we were just acting about any input that you may have on fair housing issues, and here is the survey. I'm just going to leave that one up there. So, you guys can type it in right now. Because I know you're at a computer. Most of them I guess you could call this one in, there's some phones, some phone people here. Okay. And then, you know, if you have any thoughts, you can type them into the survey. So, I'll just kind of stay here for a little bit and answer any questions that pop up on this little question pane or wave your hand and maybe I can make sure to unmute you that kind of thing. Or we can all just have a most beautiful Thursday afternoon. It's totally up to you. Yeah. 117. So, yeah. And then kind of the next just fill you in on the next steps going forward. You know, we compile the survey results, the survey stays open, all the way almost until the final report. So, after the draft report, public review has been published, the survey is open. So are the state stays open. So, we compile this all together. And then we release the Final Report, I believe late February, early March. And then we have one more public input meeting. I hope, I'm pretty sure yeah, one more public input meeting in March. Side note, I will be at the housing, the NIFA housing marketplace. Sorry the NIFA Housing Conference in March. So, I hope you all can join, join us there as well for this and some other things that we do.

Ah question Thank you. How will all the data you have been collected and using the writing, Consolidated Plan and Annual Action Plan for the State of Nebraska? Okay, that's a good question. Thank you, Pamela. So, we are also simultaneously with an AI stuff that we have here we're doing a Consolidated Plan. And a Consolidated plan has, again, its own public input process. We did a Consolidated Plan webinar this morning. And we have another one if you're interested, next Thursday as well. So, join us for that. But the data that we use in the Fair Housing and the Con Plan is slightly different because the Consolidated Plan with just focusing on the non-entitlement areas of the state, so it's minus Bellevue Grand Island likes to Nebraska minus Grand Island, Bellevue, Lincoln and Omaha. So, this data set on the Fair Housing stuff, slightly different than the Consolidated Plan, and Consolidated Plan like I said, it has its own public input process and its own survey. So, you could take both surveys, it'd be awesome. So, I hope that answers your question. We're running a simultaneous public process and data collection process for that as well. And that's all going to be identified so that the Consolidated Plan survey is and public input process is based around, you know, Consolidated Plan, funding needs and things like that identifying housing needs, service needs, economic development needs. So that that's how we do that this kind of report is part of that process, but it's still slightly out slightly in its own domain, especially since we decided to kind of split the data into two separate scopes. So, hope that answers your question. Man, I like these question boxes. That's great. Okay. Anyone else? Chat question? Raise your hand. No. Okay. Okay, well I will just, I'm going to put my in the chat, I'm going to put my email, if you'd like a copy of the presentation, just please hit me up. And I will send it to you.

There's that. And then also, I hope you take a screenshot of that survey or type it in, bookmark it, so you can send it on. It's also available on the consolidated planning website as well. So that that's all there. And I'm looking forward to seeing everyone in March and, you know, sharing some findings about this and the consolidated planning process. Great. So, next Thursday, we'll be doing it again. So, if you want to hear it again, we might update the survey results by then so that that could be fun if you want to, you

know, hear what's going on in real time. Okay. No other questions? I just don't want I don't want to cut anyone off and look, unless they have a question everything. Okay. All right. Well, thank you so much for coming, quote unquote, coming to the Fair Housing webinar State of Nebraska. Like I said, check in next Thursday, we have Consolidated Plan and another one webinar. And if you if you'd like to hear some more, come back for those. Otherwise, we'll see you in March and keep an eye out for the draft reports of both the Con Plan and the AI Realized near or that around that. So, thank you so much for coming and I hope you have a wonderful weekend. Happy Thursday.

Consolidated Plan Public Input Meeting

Presentation

Comment: How are those two different?

Presenter: Well, yeah, so independent living. So if you know if you can't walk, or if you have a hard time getting around, but you can still take care of yourself, like you you're in an accessible unit, or something like that, that, you know, you would identify as independent living. These are also since it's a community or it's a survey or they're also self-identified. So it's like the survey, you know, you do your best that you can with survey stuff. So some, you know, one person would consider themselves both ambulatory and independent living difficulty, whereas someone else might just consider themselves having an ambulatory disability feel like I can, I can still live without an independent living disability.

Comment: So would the self-care disability be where they have to have somebody come in?

Presenter: Yes, yeah.

Presentation

Comment: I would recommend that you remove the 2012 count. That was conducted under a different not only methodology, but a different organization was conducting that, and it is not valid.

Presenter: Okay, great. Thank you for coming. Yes.

Comment: there is no way that the State of Nebraska had 600 unsheltered homeless in one night.

Presenter: Yeah, that's, that's why I'm here. Thank you so much. And also that that points to, you know, what I was trying to get at is, you know, different years can have different methodologies. So it's kind of hard to track everything, but these do look, these do look, you know, the more or less the same, but so yeah, we will take out 2012. Thank you.

Presentation

Comment: They might have been flooded out.

Presenter: They could have been flooded out and just kind of Yes, exactly. Yeah, it does. It does certainly follow.

Comment: How do they get this data?

Presenter: I know that's right. I'm glad someone asked this. So they work with the United States Postal Service, then, you know, because they know if they send out the letter, the US, the US Postal Service has like a vacancy database of vacant housing units. So they work with them to get that.

Comment: So if I have a housing unit that I rent, but I don't like to advertise that I rent it. I like to handpick my tenants.

I'm probably going to show up as other vacant, right?

Presenter: If you get the form, and that's what you check. Yes.

Comment: Well, you said the Postal Service though.

Presenter: Oh for vacant it well, yes.

Comment; they probably just don't know there is nobody there.

Presenter: Yeah, they don't know. So Exactly. So that's why I really was hoping that there'd be a nice definition in the actual documentation, but there's nothing so.

Comment: So if it is vacant and dilapidated and no longer the postal service it is not in here?

Presenter: That would be I mean; the Postal Service knows. Oh, if it's completely gone.

Comment: Yeah, there's no windows.

Presenter: Yeah, it's just sitting there. That would probably be there. Yes. It would probably not be covered in the survey.

Presentation

Overview of Programs

Comment: The NHAP program trust fund this year in the State of Nebraska took in over \$1.7 million cut from its previous funding that is going to impact our homeless service system. It is going to be impacted negatively. It doesn't look like anything we can do about it. But that is a substantial cut in the emergency shelter, outreach and prevention homeless assistance program and that was across the entire state.

Presenter: Okay. Thank you said. Yeah, absolutely.

Presentation

Comment: I can't remember on the survey. Were those listed?

Presenter: Yeah, it was all it was all listed and then you like so it was all listed and then you had to rate the need, you know, low, medium, or high, you kind of just click the button, or each one of these.

Presentation

Comment: The conversation about workforce housing. I'm somewhat surprised to see the market rate housing for single family for sale, for rent, mixed income, all of that is far down the list and others workforce stuff, but just looking at what's happening in conversation in the state, yes, I will expect it to have seen those on the list, I do think this is probably more representative of where our needs are at. So just comment, that looks like the respondents are in line with what we need for construction on affordable housing.

Presenter: Yes, yes. Yes, good point.

Comment: Also, I don't know, previous years, but it seems that there is more of a balance in answers between actually single family, multi family, rents. It's actually more than the for sale.

Presenter: Yes, yes, absolutely good points.

Presentation

Comment: And community centers tied with the youth centers.

Presenter: Yes. Yeah, they're very similar.

Presentation

Comment: I guess I'll just follow up on his comments. Regarding the Nebraska Homeless Assistance Program and the Homeless Shelter Systems Trust Fund and hopefully I can articulate this is and help to the documentary stamp tax. So we have in Nebraska, we have the real estate transfer tax when a person that person purchases the home; it's \$2.25 cents for every thousand dollars of assessed value. And that's broken up into different categories. Our Nebraska Affordable Housing Trust Fund, the Homeless Shelter Systems Trust Fund, and the Behavioral Health Services Fund and I know there's other funds. The, I used to manage part of that Behavioral Health Service Fund for Region Five Systems and every year, it's based on home sales. So, every year that funding would go up in the Division of Behavioral Health and would allocate additional dollars to the Regional Behavioral Health Authorities throughout the Nebraska. But that the point is that that funding would increase as home sales would do well. So offered opportunities for better health providers and that scattered site rental assistance. Thousands of people with serious mental illnesses are housed. It's an incredible program that's unique to Nebraska and it provides housing discharge plan for people coming out of state institutions. So I would, I would assume that the Homeless Shelter Assistance Trust Fund would also see increases. And I think that there's a need for, we are luckily in Nebraska, we do have a new position at the State of Nebraska through the Division of Behavioral Health. Its job is to link the siloed HHS Departments, so we have public health, which manages the HOPWA, Housing Opportunities for Persons with AIDS. We have the Behavioral Health which does that behavioral health funding and then we have the Children and Family Services Division, which manages that Homeless Shelter System Fund and HAP. And this new position, then we'll hopefully link those and I'm wondering if they can learn from each other, streamline their efforts. We have an incredible coordinated entry system in Nebraska now that closed side door agencies and created one front door where agencies come together use a similar, the same assessment tool to identify homeless folks. And they, as a community decide who is most vulnerable and who needs that housing. And so, instead of this agency deciding to house this person and that one, now it's streamlined, and we all provide housing. The person really who's most likely to die on the streets, we get them housed first, then the community makes that decision. I wonder if there's a way that the community can help streamline These different homeless, special need population funding sources. So, having said that, that's where the surprise comes in and maybe there was a drop in this funding, because it would appear that home sales are increasing. I just think there's an opportunity where those programs maybe should mirror each other. Why is one increasing where the other ones decreasing? Just for record, I don't know.

Comment: I didn't even know it was decreasing.

Comment: So, it was the state funding that decreased?

Comment: Yes.

Comment: Just to follow up on that the Department is having open door meetings about the cause on why the funding has decreased. It is more complicated than just what we have here, but nonetheless, that funding that we're operating at as a homeless service system is, is decreasing. It's almost 37% of the total funding. And to do that to an emergency crisis system like that is devastating. So I think what he is suggesting, with collaboration across the systems, more communication about upcoming changes would have been incredibly beneficial for the emergency system to know to start planning, because now we've

got basically from now until April to plan how we're going to manage these cuts across and that's significant. So your numbers on the Point-in-Time I would predict it increasing.

Comment: You know, that will tie into the federal funds that we then receive from our numbers and our appropriations of those statements will also be affected. So, it has a very large ripple effect on the entire state and into other state systems.

Comment: I would, even if that weren't such a pressing issue right now. I think what we need to keep in mind when we look at these federal programs, this there is a tendency in administering them to lean towards what is what some communities will often say that one homeowner they anchor the community, they build wealth, all of those things are positive. But if you have a system that does have the resources became housing rental assistance and they can't find units. We still have something that we have to address. So we need to make sure we can keep in mind that those rental units are needed in these communities, I'm not saying whether they need to be new construction or preservation of what we have or rehab or all of the above. But in allocating resources, we need to take a look at that. It's more difficult to finance rental housing, because it's not based on you know, I've got this value this house and mortgage on it. And so I think we also tend to lean towards the homebuyer, because you tend to get more units and assistance, those kinds of things. But even in the even in these preliminary results of the survey, so there's some recognition that there needs to be probably rentals at all kinds of income levels. People may eventually buy a house, all of those kinds of things. Every year we fall further and further behind in that in that scenario, our best tool is Low Income Housing Tax Credit, however, it is one sector of the population that we're addressing with that and there are rental housing needs to go higher and even sometimes to lower incomes.

Presenter: Perfect. Thank you. Yeah, we do see that the survey. So that's good. That's why I'd like to see, you know, things come together.

Public Input Meetings for the Consolidated Plan, Analysis to Impediments of Fair Housing Choice, AAP and CPP

4/14/2020 1st Meeting

Comment: What resources could help non entitlement communities tear down basic making housing stock for disrepair?

Presenter: That's a really good question. Thank you, Yeah, we just see a high need for vacant housing units. A high need to tear down dilapidated housing stock. Let's see if there's a, So there should be and it could fall into downtown revitalization, Public Works. So yes, that's a good question. I'd have to figure out the exact program or how you'd apply to that. But hopefully that will be addressed, but hopefully there are some ways to do that because it did it did, you know, pull out in the yeah. In the in the excuse me in the community infrastructure, economic development. So yes, that's a good question. Hopefully, hopefully, we'll be able to answer if I can't. So the other thing if I can't answer the questions now, we will answer them for the final public or Final Report.

Comment: How do these numbers affect your decisions about minimum grant application amounts? We have many communities who have very small budgets and would like to apply but can't meet the match with such high minimum app amount requirements.

Presenter: Also a very good question. On the program side. Let's see here. That is a good question. And that would have to be hand handled someone internally there that that deals with that. Yes, Rebecca. Steve in Charleston. I got you, Steve. Let me see if I can find See, Steve should be able to answer that one. There we go.

Comment: Can you hear me?

Presenter: Yeah, I can hear you.

Comment: What was the question again?

Presenter: I believe it's out of the numbers affect your to see around minimum grant application amounts, we have many communities who have very small budgets and would like to apply but can't meet the match with such high minimum application requirements.

Comment: That's a good question that's come up before in the past. I would encourage those to submit those comments. And one of the reasons we set a minimum is because we have a expenditure rate that's reviewed by HUD, and they keep track of the amount of funds on balance in the US Treasury. And so the number of grants we have to manage is very large when the amounts are very small, as we move forward, so we've determined that there is a an amount to work from as a as an operating base. So we set some minimums that aren't what I consider to be large and we've also said some maximum which, we've increased the amount of funds that a local government can apply for. So it's driven by the fact that we have HUD looking at how we expand our funds quickly and it's also based upon the number of projects the states has to manage, and take care of as the grant administrator each year and over the multiple years.

Presenter: Cool. Well, thank you for that clarification. I hope that answers your question. But it is now you know, that question is recorded, so we'll certainly add that in the final. Cal Grimes I tried to unmute you because I see your hand up but I can't unmute you. You have to dial a pin or

whatever. Yeah. who would I who would address the resources for entitlement communities that could tear down vacant housing stock that is in disrepair? Do you have someone that would be able to adjust that. Let's see if we can get an answer. Or if anyone has additional questions, keep them rolling in. So just to kind of circle back to Elizabeth question of what resources could help my community tear down vacant housing stock to tear down structures and NAHTF funds could be used with another activity would need to be combined with it. So thank you, Rebecca, for helping me out there.

4/14/2020 2nd Meeting

No comments