

# Analysis of Impediments to Fair Housing Choice

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Rome, Georgia

November, 2013

**Prepared for  
The City of Rome**

**By**



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## Introduction

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Equal access to housing choice is a cornerstone principle of America's commitment to equality and opportunity for all. Title VIII of the Civil Rights Act of 1968, more commonly known as the Fair Housing Act, ensures protection of housing opportunity by prohibiting discrimination in the sale or rental of housing on the basis of race, color, religion, sex, and national origin. The Act was amended in 1988 to provide stiffer penalties, establish an administrative enforcement mechanism and to expand its coverage to prohibit discrimination on the basis of familial status and disability. The U.S. Department of Housing and Urban Development (HUD), and specifically HUD's Office of Fair Housing and Equal Opportunity (FHEO), is responsible for the administration and enforcement of the Fair Housing Act and other civil rights laws.

Provisions to affirmatively further fair housing (AFFH) are principal and long-standing components of HUD's housing and community development programs. These provisions flow from the mandate of Section 808(e)(5) of the Fair Housing Act which requires the Secretary of HUD to administer the Department's housing and urban development programs in a manner to affirmatively further fair housing<sup>1</sup>. A fair housing study, known as an Analysis of Impediments to Fair Housing Choice (AI), is required of HUD grantees, such as the City of Rome, receiving funds under the Community Development Block Grant (CDBG) program. To perform this Analysis of Impediments, the City of Rome has contracted with WFN Consulting.

Through the analysis process, local communities promote fair housing choices for all persons, to include Protected Classes, as well as provide opportunities for racially and ethnically inclusive patterns of housing occupancy, identify structural and systemic barriers to fair housing choice, and promote housing that is physically accessible and usable by persons with disabilities. By analyzing and taking actions to address any identified impediments, the City will satisfy HUD that it is meeting its obligations and certifications to affirmatively further fair housing.

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<sup>1</sup> U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity. *Fair Housing Planning Guide: Volume 1 (Chapter 1: Fair Housing Planning Historical Overview, Page 13)*. March 1996.

## Definitions & Data Sources

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### Definitions

**Affirmatively Further Fair Housing** - As defined in HUD's *Fair Housing Planning Guide*, the definition of "Affirmatively Further Fair Housing" (AFFH) requires a grantee to:<sup>2</sup>

- Conduct an analysis to identify impediments to fair housing choice within the jurisdiction;
- Take appropriate actions to overcome the effects of any impediments identified through the analysis;
- Maintain records reflecting the analysis and actions taken in this regard.

**Certification** - As described in the *Fair Housing Planning Guide*, the Comprehensive Housing Affordability Strategy (CHAS) statute at Section 104(21) defines the term "certification" within the context of the Certification to Affirmatively Further Fair Housing (AFFH) to be:<sup>3</sup>

- A written assertion
- Based on supporting evidence
- Available for inspection by the Secretary, the Inspector General and the public
- Deemed accurate for purposes of this Act unless the Secretary determines otherwise after:
  - Inspecting the evidence
  - Providing due notice and opportunity for comment.

**Fair Housing Choice** - In carrying out its Regional Analysis of Impediments to Fair Housing Choice, the City of Rome utilized the following definition of "Fair Housing Choice":

- The ability of persons of similar income levels to have available to them the same housing choices regardless of race, color, religion, sex, national origin, familial status, or handicap.

**Impediments to Fair Housing Choice** - As described in the *Fair Housing Planning Guide*, impediments to fair housing choice include:<sup>4</sup>

- Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin which restrict housing choices or the availability of housing choices.
- Any actions, omissions, or decisions which have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex, disability, familial status, or national origin.

**Protected Classes** - In carrying out its Regional Analysis of Impediments to Fair Housing Choice, the City of Rome utilized the following definition of Protected Classes:

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<sup>2</sup> U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity. *Fair Housing Planning Guide: Volume 1 (Chapter 1: Fair Housing Planning Historical Overview, Page 1-2)*. March 1996.

<sup>3</sup> Ibid. Page 1-4.

<sup>4</sup> U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity. *Fair Housing Planning Guide: Volume 1 (Chapter 2: Preparing for Fair Housing Planning, Page 2-17)*. March 1996.

- Title VIII of the Civil Rights Act of 1968 prohibits housing discrimination based on race, color, national origin or ancestry, sex, or religion. The 1988 Fair Housing Amendments Act added familial status and mental and physical handicap as protected classes.

**Affordable** - Though local definitions of the term may vary, the definition used throughout this analysis is congruent with HUD's definition:

- HUD defines as "affordable" housing that costs no more than 30% of a household's total monthly gross income. For rental housing, the 30% amount would be inclusive of any tenant-paid utility costs.
- For homeowners, the 30% amount would include the mortgage payment, property taxes, homeowners insurance, and any homeowners' association fees.
- Housing affordable to a low-income family of four (income up to 80% of the area median income) residing in Rome would carry a total monthly cost of up to \$1,006 as reported by the National Low Income Housing Coalition's 2012 *Out of Reach* data.

### Data Sources Used in this Analysis

**Decennial Census Data** – Data collected by the Decennial Census for 2010, 2000, and 1990 is used in this Analysis (older Census data is only used in conjunction with more recent data in order to illustrate trends). The Decennial Census data is used by the U.S. Census Bureau to create several different datasets:

- 2010 and 2000 Census Summary File 1 (SF 1) – This dataset contains what is known as “100 percent data”, meaning that it contains the data collected from every household that participated in the 2010 Census and is not based on a representative sample of the population. Though this dataset is very broad in terms of coverage of the total population, it is limited in the depth of the information collected. Basic characteristics such as age, sex, and race are collected, but not more detailed information such as disability status, occupation, and income. The statistics are available for a variety of geographic levels with most tables obtainable down to the census tract or block level.
- 2000 Census Summary File 3 (SF 3) – Containing sample data from approximately one in every six U.S. households, this dataset is compiled from respondents who received the “long form” Census survey. This comprehensive and highly detailed dataset contains information on such topics as ancestry, level of education, occupation, commute time to work, and home value. The SF 3 dataset was discontinued for the 2010 Census; therefore, SF 3 data from the 2000 Census was the only tract-level data source available for some variables.

**American Community Survey (ACS)** – The American Community Survey is an ongoing statistical survey that samples a small percentage of the U.S. population every year, thus providing communities with more current population and housing data throughout the 10 years between

censuses. This approach trades the accuracy of the Decennial Census Data for the relative immediacy of continuously polled data from every year. ACS data is compiled from an annual sample of approximately 3 million addresses rather than an actual count (like the Decennial Census's SF 1 data) and therefore is susceptible to sampling errors. This data is released in two different formats: single-year estimates and multi-year estimates.

- ACS 1-Year Estimates – Based on data collected between January and December of the same calendar year, these single-year estimates represent the most current information available from the U.S. Census Bureau, however; these estimates are only published for geographic areas with populations of 65,000 or greater.
- ACS Multi-Year Estimates – More current than Decennial Census data and available for more geographic areas than the ACS 1-Year Estimates, this dataset is one of the most frequently used. Because sampling error is reduced when estimates are collected over a longer period of time, 5-year estimates will be more accurate (but less recent) than 3-year estimates. ACS datasets are published for geographic areas with populations of 20,000 or greater.

**Federal Financial Institutions Examining Council (FFIEC)** – The FFIEC collects and publishes certain data used in connection with federal reporting responsibilities under the Home Mortgage Disclosure Act and the Community Reinvestment Act.

- FFIEC 2011 Census Reports – All FFIEC Census Reports from 2003 forward are based upon Census 2000 data while the FFIEC's Census Reports prior to 2003 are based on Census 1990 data. While most data fields in the 2011 Reports contain Census 2000 figures, some fields contain more current estimates that are arrived at through data processing by other federal agencies (most notably, a 2011 Estimated Median Family Income both by MSA and by census tract is provided by HUD, using HUD's own, independent data processes).
- Home Mortgage Disclosure Act (HMDA) Data – Financial institutions subject to the HMDA (including banks, credit unions, and other mortgage lenders) must annually submit certain mortgage loan data to the FFIEC. The FFIEC aggregates and publishes the data. The most current HMDA data used in this Analysis is based on loan records from the 2011 calendar year.

### Stakeholder Engagement

**Rome Fair Housing Survey** – This survey was designed to collect input from a broad spectrum of the community and received responses from Rome residents and non-residents. The survey consisted of 33 distinct questions, allowing a mixture of both multiple choice and open-ended responses. In all, there were 186 responses to this survey, though not every question was

answered by every respondent. As a result, where a percentage of survey respondents are cited in this Analysis, it refers only to the percentage of respondents to the particular question being discussed and may not be a percentage of the full 186 survey respondents. Surveys were received over a 41-day period, from July 17, 2013 to August 26, 2013. To prevent “ballot stuffing”, the SurveyMonkey software bars the submission of multiple surveys from a single IP address. The link to the online survey was distributed through various email distribution lists. Paper surveys were made available but no responses were received to this survey format.

**Stakeholder Interviews** – Key community stakeholders were identified, contacted, and interviewed either individually or in small groups as part of this Analysis. These stakeholders included representatives of nonprofit organizations, municipal staff, fair housing advocates, and real estate agents. Other stakeholders not belonging to any of these groups were occasionally interviewed as dictated by the course of research carried out for this Analysis. In all, 15 stakeholder interviews were conducted.

**Public Meetings** – Four public meetings were held in order to provide forums for Rome residents and other interested parties to contribute to this Analysis. Meeting dates, times, and locations are listed below. Meetings were held both during the day and in the evenings in various locations across the city, providing a variety of options for residents to attend. These meetings were advertised via flyers and emails distributed by the City and WFN Consulting using their various email distribution lists. A press release was picked up by the Rome News-Tribune and WRGA, a local AM radio station. A display ad was placed in the Rome News-Tribune advertising the public hearing. The format of these meetings ranged from small-group roundtable discussions to moderated forums. Notes were taken of the public comments at all meetings.

**Kickoff Meeting**

Rome City Commission Chambers  
City Hall  
601 Broad Street  
Tuesday, July 16, 2013  
2:00 p.m.

**Neighborhood Meeting**

Napoleon Fielder Center  
1500 Crane Street  
Wednesday, July 17, 2013  
5:30 p.m.

**Neighborhood Meeting**

Kelsey Aycock Burrell Center  
41 Washington Drive  
Tuesday, July 16, 2013  
5:30 p.m.

**Public Hearing**

Rome City Commission Chambers  
City Hall  
601 Broad Street  
Thursday, September 26, 2013  
2:00 p.m.

## Limitations of this Analysis

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This Analysis of Impediments to Fair Housing Choice was prepared by WFN Consulting for the City of Rome. This report seeks to analyze the current fair housing climate in the city, identify impediments to fair housing choice, and set forth recommended strategies for overcoming the identified impediments. Some of the impediments identified in this report will require additional research and on-going analysis by entities within the region.

HUD's primary guidance for developing Analyses of Impediments is found in the *Fair Housing Planning Guide*, published in 1996. Since that time, HUD's approach to fair housing has greatly evolved and guidance has largely yet to catch up. As this AI was being drafted, HUD released a new proposed rule titled "*Affirmatively Furthering Fair Housing*" that outlines significant changes to the development of local fair housing studies. To maintain project deadlines, this AI uses the *Fair Housing Planning Guide* as an underpinning resource complimented where possible with elements of the proposed rule and particular knowledge of HUD's more recent expectations relative to AIs.

Throughout this analysis, the authors have made careful decisions regarding which datasets to use. The choice of a dataset often involves tradeoffs between criteria. For example, more recent datasets often have a limited number of data variables available for analysis. Additionally, there is the unavoidable tradeoff between geographic and socio-economic detail (less detailed data for smaller geographies) that sometimes restricts the availability of data. Also, the detailed definitions of data variables can change over time limiting their comparability.

Large portions of this analysis rely upon Census data reported at the census tract level. Census tracts do not follow municipal boundaries, meaning the tracts used may include both residents and non-residents. Erring on the side of inclusivity, this research considered data from all census tracts containing even a portion of the city. By this approach, every resident of the city is represented, along with some who reside outside the city limits. The authors found this preferable to methodologies that would have excluded non-residents at the expense of also excluding some city residents.

Though licensed attorneys with land use and fair housing experience have participated in the research contained herein, no portion of this Analysis shall constitute or be relied upon as legal advice or as a legal opinion.

Finally, all source data used in the preparation of this analysis, whether from national sources (e.g. the U.S. Census Bureau), local sources (e.g. the City's Transit Department), or from proprietary sources (e.g. the National Low Income Housing Coalition) is assumed to be accurate.

## Historical Overview

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Located in the northwestern part of the State of Georgia, Rome ranks as one of the top growth areas in the state.<sup>5</sup> Situated within a triangle defined by Atlanta; Birmingham, Alabama; and Chattanooga, Tennessee, Rome is the seat of Floyd County.<sup>6</sup> The City limits incorporate over thirty-one square miles and have a population of 36,303.

Originally inhabited by the Cherokee, Europeans were attracted to this area when gold was discovered in 1828. The present City of Rome was established in 1834 on the site of a major Cherokee settlement called Head of Coosa, located where the confluence of the Etowah and Oostanaula rivers forms the Coosa River.<sup>7</sup> The city's five founders wanted to develop the peninsula into a town that would eventually become a trade center. One of these five men, Colonel Daniel Mitchell, suggested Rome as the name for the town. In the following year, Rome received its charter and was declared a county seat.

Historically, Rome's distinction was based on the transportation and cotton industries; today, health care and education are more important to Rome's influence. Rome is the regional headquarters for the Georgia Department of Community Affairs; the Department of Economic Development; and the Division for Public Health. The Northwest Georgia Regional Commission is also located in Rome. In 2003, on the basis of population and market area, Rome and Floyd County were designated as one of Georgia's fifteen metropolitan statistical areas.

The City government operates under a commission-manager form of government. Commission elections are non-partisan and commissioners serve staggered terms. There are nine commissioners serving on the City Commission with the Mayor and Mayor Pro Tem elected from within the commission.

Rome has been called the most livable small city in the Southeast by the *New Rating Guide to Life in America's Small Cities* (1997). This publication also rated Rome first in health care among the nation's 193 small cities. There are three hospitals in Rome—one public, one private, and one state. Additionally, the Harbin Clinic is a multiple-specialty physicians' group that includes about 130 members of the community's 350 physicians. Rome's superior medical facilities serve a regional population estimated at more than 500,000 in two states.

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<sup>5</sup> <ftp://ftp.rome.ga.us/Finance/CityOfRome-2011-CAFR.pdf>

<sup>6</sup> <http://www.citytowninfo.com/places/georgia/rome>

<sup>7</sup> <http://www.georgiaencyclopedia.org/nge/Article.jsp?id=h-2211>

## Demographic Overview

### Population Characteristics

As of the 2010 Decennial Census, the City of Rome had a total population of 36,303. The City's racial makeup consisted of 57% White; 28% Black or African American; 1% American Indian and Alaskan Native; 2% Asian; less than 1% Native Hawaiian and Other Pacific Islander; 10% from other races; 2% from two or more races; and 16% were Hispanic or Latino of any race.

**Table 1: Demographic Profile Highlights of the City of Rome**

Demographic Profile Highlights 2000 and 2010 Census		
	2000	2010
Total Population	34,980	36,303
Male	16,586	17,285
Female	18,394	19,018
One Race	34,407	35,407
White	22,081	20,821
Black or African American	9,677	10,075
American Indian and Alaskan Native	135	214
Asian	496	694
Native Hawaiian and Other Pacific Islander	56	70
Other race	1,962	3,533
Two or more races	573	896
Hispanic or Latino (of any race)	3,620	5,892

When viewing a comparison of household data from 2000 to 2010 the data presents a few significant trends. In 2000, the Census counted 13,320 households, 29.1% of which included children under the age of 18. Married couples living together made up 41.2% of the City's households, female-headed households made up 17% of the total, and 36.7% were nonfamily households. In 2000 the average household size was 2.47 and the average family size was 3.07. After a decade of slow population growth, the total number of households increased to 13,885. Households with children increased by 33%, and female-headed households increased by 2.1%. Nonfamily households increased by 1.2%. In 2010, the average household size was 2.58 and the average family size was 3.16.

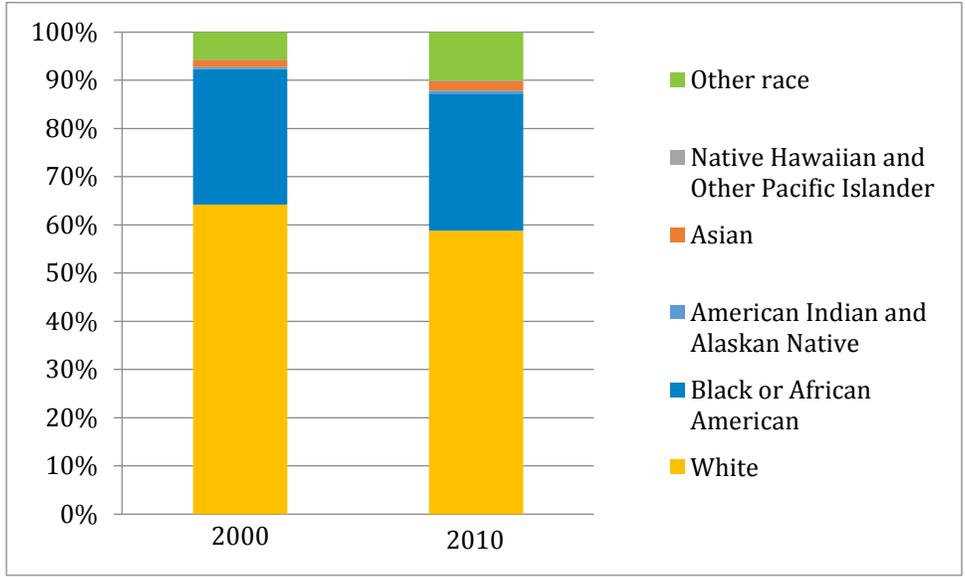
**Table 2: Historical Demographic Trends**

Historical Demographic Trends			
	2000	2010	% Change 2000-2010
Total Population	34,980	36,303	3.7%
White	22,081	20,821	-5.7%
Black or African American	9,677	10,075	4.1%
American Indian and Alaskan Native	135	214	58.2%
Asian	496	694	39.9%
Native Hawaiian and Other Pacific Islander	56	70	25%
Other race	1,962	3,533	80%
Hispanic or Latino (of any race)	3,620	5,892	62.7%

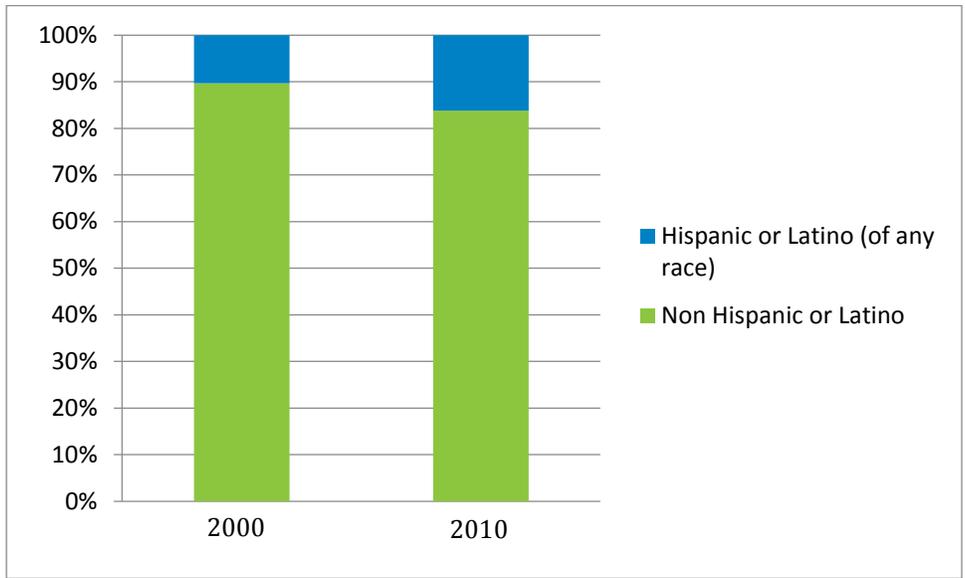
Although the population has increased since 2000, based on the historical data, not all racial and ethnic groups increased at comparable rates. Blacks and African Americans remained a 28% share of the population; however, their population has increased by approximately 4%. The White population has decreased from 63% in 2000 to 57% in 2010. The remaining 15% is distributed among the following minority populations: American Indian and Alaskan Native, Asian, Native Hawaiian and Other Pacific Islander, Other race, and, Two or more races. The Hispanic or Latino population also increased from 10% in 2000 to 16% in 2010.

The greatest share of Rome’s population increase is credited to the “other race” population. While only making up 6% of the population in 2000, residents reporting as “other race” had increased to 10% by 2010. The “other race” option encompasses individuals who do not identify solely within any of the listed race options. Respondents reporting entries such as multiracial, mixed, interracial, or a Hispanic or Latino group (for example, Mexican, Puerto Rican, Cuban, or Spanish) in response to the race question are included in this category. When tabulated with 2010 data, fewer people identified with the “two or more races” when given the option to choose “other race”, thus supporting the significant 80% increase in individuals identified with “other race”.

**Table 3: Race as a Percentage of Total Population: 2000-2010**



**Table 4: Hispanic/Latino Ethnicity as a Percentage of Total Population: 2000-2010**



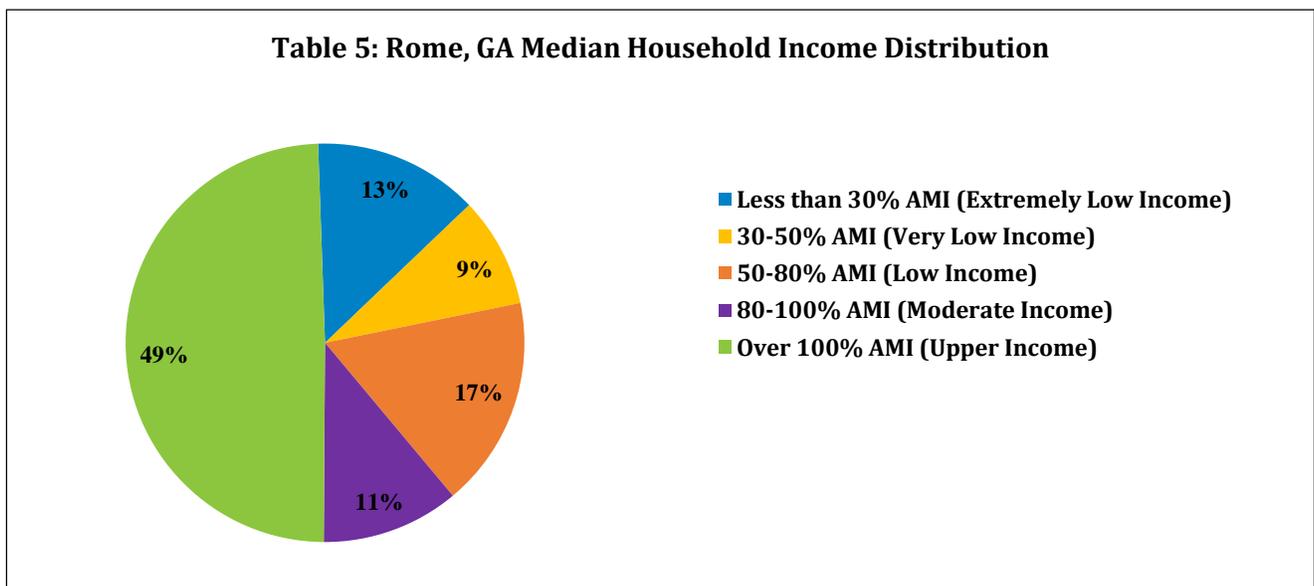
Although the City’s population remains predominantly White, the Hispanic/Latino population increased significantly over the past decade. The City’s population growth over this period can all be attributed to increases in minority populations.

## Employment & Economic Profile

Like a majority of cities in the United States, Rome is still recovering from the impact of the economic recession faced over the past decade. As a result of the recession, some residents of the Rome area lost jobs or received pay cuts, reducing or eliminating their ability to contribute to their household income. Household income plays the most important role in helping individuals and families determine how much money they need to budget for mandatory expenditures, like mortgage, rent, or utility payments in comparison to discretionary income they may have available for living expenses or savings and investments. Household income is a strong indicator for an individual or family's standard of living. While economic factors may not be the strongest determinant in a family or individual's housing choice in every circumstance, the relationships between household income and race, gender and other factors should be evaluated for the potential for restrictions to fair housing choice and personal rights.

According to the 2007-2011 American Community Survey, the household median income for Rome, GA is \$33,719. HUD has established the following categories based on Area Median Income (AMI) for the City of Rome, GA:

- Extremely Low Income Households (Less than 30% AMI)
- Very Low Income Households (30-50% AMI)
- Low Income Households (50-80% AMI)
- Moderate Income Households (80-100% AMI)
- Upper Income (Over 100% AMI)



Source: U.S. Census Bureau, Census (2010)

## **Family and Household Income**

The 2010 Census reported the median household income in Rome as \$33,719. This is a 9% increase from the median household income of \$30,930 in the 2000 Census.<sup>8</sup> The median family income (MFI) in 2010 was \$45,907. This number increased by 22% from the 2000 Census MFI of \$37,775. These figures suggest that respondents who reported living as a family in the 2010 census receive more income than those living as unrelated individuals in a household.

The Census reflected an 18% increase in per capita income from \$17,327 in 2000 to \$20,434 in 2010. These increases offer support that even though households in Rome may have seen short term losses in income, there was an overall long term increase in the amount of income per household and per family over the decade.

## **Unemployment**

The chart shown in the following table reflects the increase in the unemployment rate in Rome from 2003 to 2012. The sharpest rise in the unemployment rate begins in 2007 at 4.8% and rises to 10.8% in 2011.<sup>9</sup> The 2010 Census estimated that there were 1,937 unemployed residents in Rome.<sup>10</sup> This number was up almost 58% from the 2000 Census count of unemployed citizens in Rome of 1,227.

As a community's unemployment rate rises, its households have less money available to budget between mandatory expenses like their mortgage or rent payments and their discretionary expenses. Rome's consolidated plan for 2009-2013 lists a total of 4,495 households (combined owners and renters) below 80% area median income in need of some form of housing assistance.<sup>11</sup> This number reflects the high number of households that have lost financial resources needed to pay for housing expenses. Given the total of 13,424 households recorded in the 2010 Census, about 30% of the city's households were low-income and in need of some type of housing rehabilitation or financial assistance.

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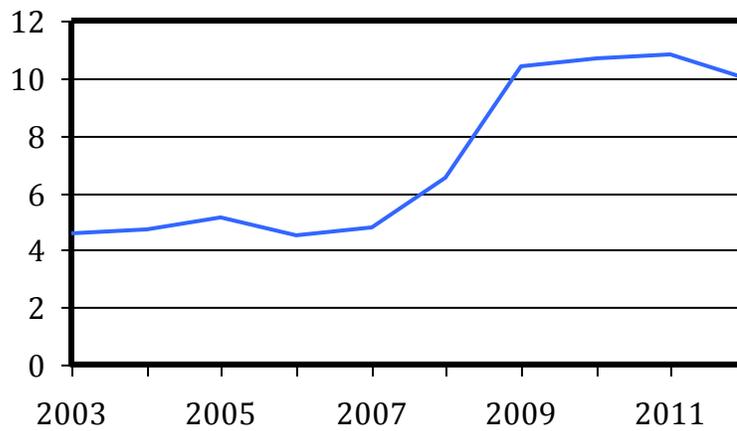
<sup>8</sup> U.S. Census Bureau, Census 2000.

<sup>9</sup> Bureau of Labor Statistics. *Local Area Unemployment Statistics*. Unemployment data for City of Rome, GA (2003-2012). LAUMT13406603

<sup>10</sup> U.S. Census Bureau, Census 2010.

<sup>11</sup> Rome, GA Consolidated Plan for 2009-2013.

**Table 6: Rome, GA Unemployment Rate 2003-2012**



Source: Local Area Unemployment Statistics. Unemployment data for City of Rome, GA (2003-2012).

### Poverty

An estimated 25.7% of Rome’s population was living below the poverty line according to the 2007-2011 American Community Survey.<sup>12</sup> This data reflects an increase in the amount of residents in poverty as the below poverty rate stood at 20.3% in the 2000 Census. According to the 2010 Census, 12.9% of married couples, and 38.1% of households with a female head and no husband present are also living below the poverty level. Poverty percentages for families and individuals as well as those for married couples and female heads of household are all greater than those for the state overall.

**Table 7: Poverty Percentages, Rome, Ga.**

	Rome, Ga.	State of Georgia
<b>All Families</b>	19.5%	12.6%
With related children under 18 years	27.2%	18.4%
With related children under 5 years only	26.1%	19.2%
<b>Married Couple Families</b>	12.9%	6.0%
With related children under 18 years	18.7%	8.2%
With related children under 5 years only	21.8%	7.6%

<sup>12</sup> American Community Survey. 5-Year Estimates for Individuals living below poverty in Rome, GA. 2007-2011.

	Rome, Ga.	State of Georgia
Families with Female Head of Household, No Husband Present	38.1%	32.1%
With related children under 18 years	47.3%	39.6%
With related children under 5 years only	41.9%	46.5%
<b>All Residents</b>	25.7%	16.5%
Under 18 Years	32.1%	22.6%
Related children under 18 years	31.9%	22.3%
Related children under 5 years only	33.5%	26.2%
Related children 5-17 years	31.1%	20.8%
18 years and over	23.5%	14.4%
18 to 64 years	25.7%	14.8%
65 years and over	14.7%	11.5%
People in families	22.4%	14.3%
Unrelated individuals 15 years and over	37.1%	27.7%

Source: 2007-2011 American Community Survey 5-Year Estimates, U.S. Census Bureau, [www.census.gov](http://www.census.gov)

## Workforce and Industry

Rome's employed population is comprised of 14,335 city residents. The table below separates the workforce in Rome by percentage. At almost 80%, a vast majority of Rome's workforce is made up of private-sector workers. Government employees make up 14% of the workforce and self-employed, unincorporated business workers and unpaid family workers make up the last 6% of the city's workforce.

When further breaking down these categories, the healthcare, education and social services fields employ almost 30% of Rome's workforce. Using data from the Greater Rome Chamber of Commerce, Table 3 lists Rome's top employers as: Floyd Medical Center, Floyd County schools, Harbin Clinic, Redmond Regional Medical Center, Rome City schools and Berry College, which have a combined total of 8,047 employees that live within Rome or in the limits of Floyd County. These numbers support the census data showing a majority of

Rome’s residents working in these fields. The second largest industry in Rome, employing 13.5% of the workforce, is manufacturing followed by the professional, scientific, management, administrative, and waste management field at 10.5%. The art, entertainment, recreation, accommodation, and food service industry accounts for 9.5% of the workforce. The table shown below provides a detailed account of the workforce industries in Rome.

**Table 8: City of Rome Industry Sector Percentages**

Industry	Labor Force	Percent
<b>Class of Worker</b>		
Private Wage & Salary Workers	11,451	79.9%
Government Workers	2,051	14.3%
Self-Employed in Own Not Incorporated Business Workers	782	5.5%
Unpaid Family Workers	51	0.4%
<b>Total Private Industry</b>		
Civilian employed population 16 years and over	14,335	--
Agriculture, Forestry, Fishing, Hunting, & Mining	152	1.1%
Construction	1,148	8%
Manufacturing	1,941	13.5%
Wholesale Trade	239	1.7%
Retail Trade	1,163	8.1%
Transportation & Warehousing, & Utilities	475	3.3%
Information	214	1.5%
Finance & Insurance, Real Estate, Rental, & Leasing	571	4%
Professional, Scientific, Management, Administrative, & Waste Management	1,511	10.5%
Educational Services, Healthcare, & Social Assistance	4,258	29.7%

Industry	Labor Force	Percent
Arts, Entertainment, Recreation, Accommodation, & Food Services	1,368	9.5%
Other Services, Except Public Administration	775	5.4%
Public Administration	520	3.6%

Source: 2010 American Community Survey 5-Year Estimates, U.S. Census Bureau, [www.census.gov](http://www.census.gov)

**Table 9: City of Rome/Floyd County Top Employers, Updated May 2013**

Company	Industry	# of Employees
Floyd Medical Center	Healthcare	2,790
Floyd Co. Schools	Public	1,523
Harbin Clinic	Healthcare	1,226
Redmond Regional Medical Center	Healthcare	1,200
Floyd Co. Government	Public	1,126
Rome City Schools	Public	751
City of Rome	Public	614
Kellogg Company	Food Production	550
Berry College	Private	557
F&P Georgia	Automotive	515

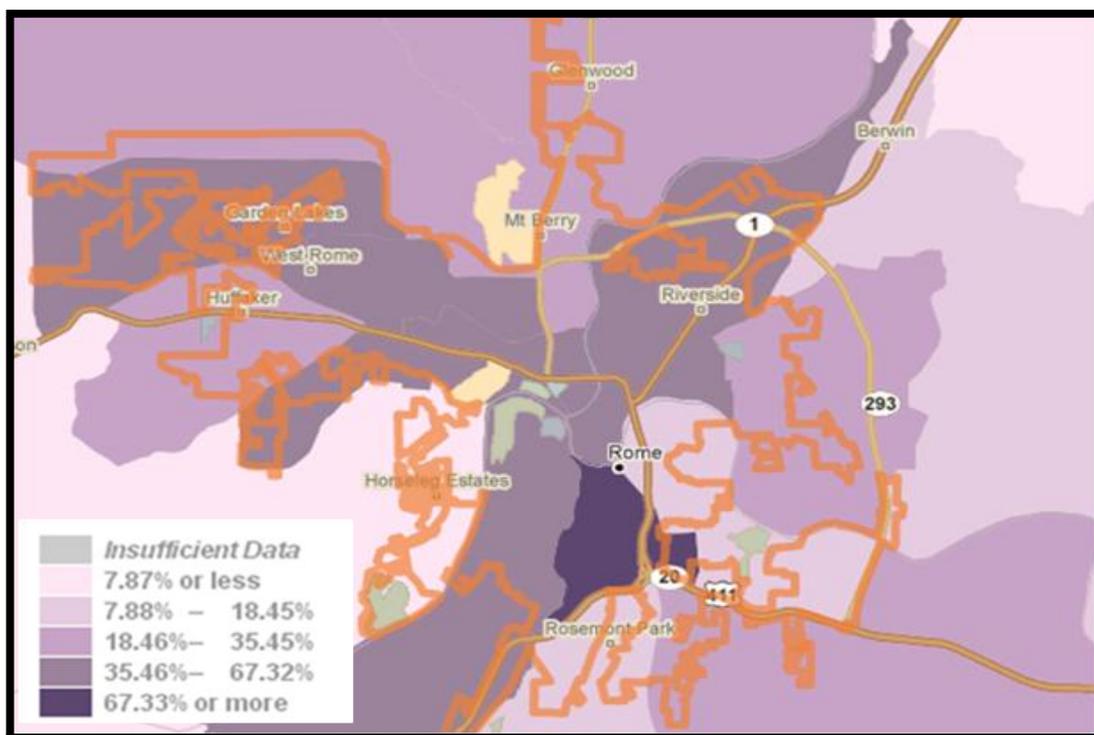
Source: Greater Rome Chamber of Commerce (May 2013)  
Source: <http://www.romea.com/eco-industryemployers.htm>

## Protected Class Analysis

Historically, the non-Hispanic White population has made up the majority of the City of Rome's population. The largest growth in the City is credited to the Hispanic or Latino population and the "other race" population. Hispanic or Latino individuals of any race made up 16.2 % of the total population in 2010 compared to 10.3% in 2000. In 2010, individuals identified as Other Race made up 9.2% of the population compared to 5.6% in 2000 due to the addition of the "other race" category. Documentation from the Census Bureau shows that many Hispanic and Latino individuals identify with the "other race" category. The tract with the greatest minority concentration of 67.33% or more was tract 16.00 in South Rome.

The map below illustrates the city limits in orange, while the shaded areas represent minority concentrations through the city tracts. This map in particular shows the concentrations of non-white persons living throughout the City of Rome. Minorities make up approximately 42.6% of the City's total population, but the concentrations vary widely between individual tracts from under 8% to more than 67%.

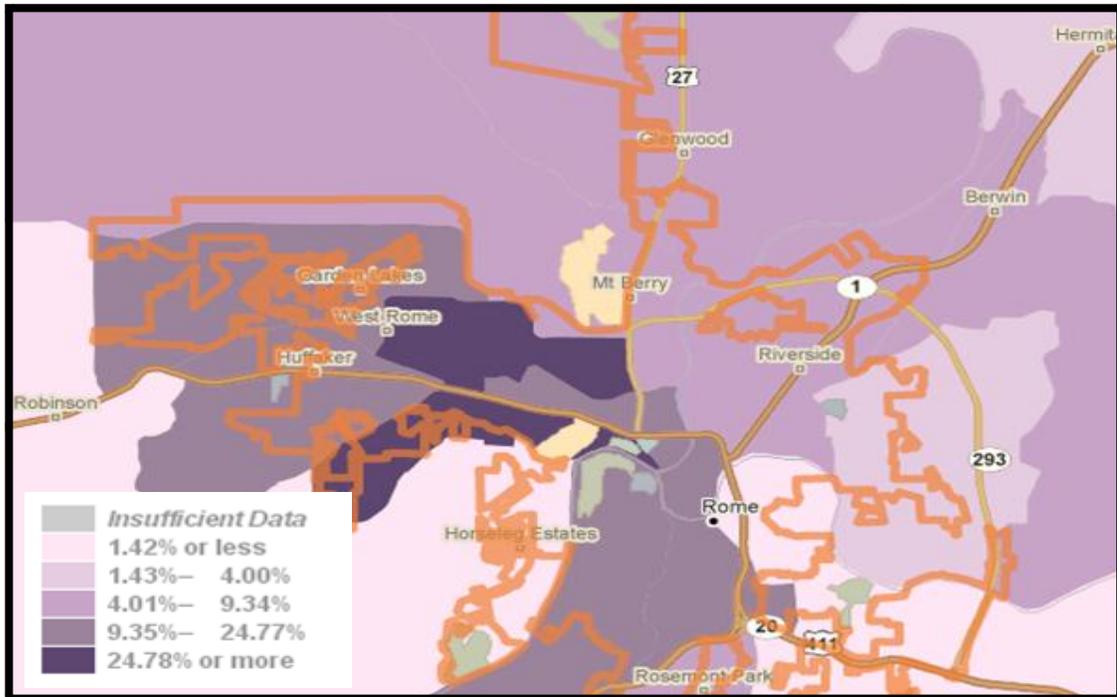
**Figure 1: City of Rome Minority Concentrations**



Source: [www.policymap.com](http://www.policymap.com)

The map below shows Hispanic/Latino population concentrations. The Hispanic and Latino population has shown a significant increase from 10.3% of the City's residents in 2000 to 16.2% in 2010. The greatest concentrations are located in Census tracts 4.00, 5.00, and 12.00 which are all located in West Rome.

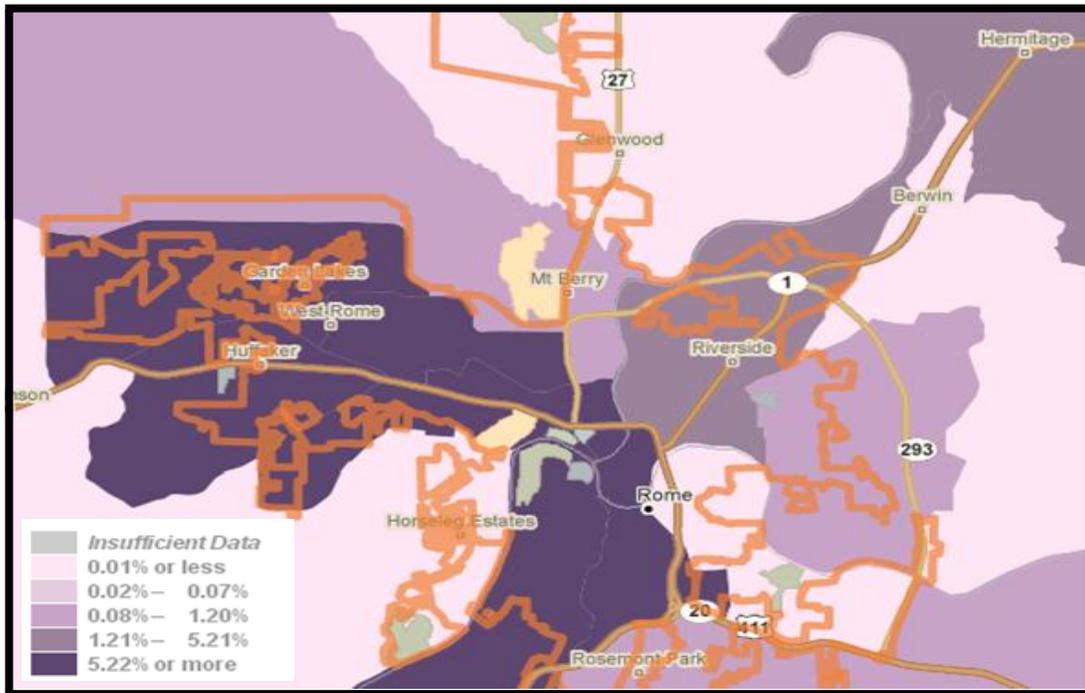
**Figure 2: Hispanic or Latino Population in City of Rome**



Source: [www.policymap.com](http://www.policymap.com)

The map below shows the percentage of individuals identifying as “Other Race” residing in the City of Rome. Per the Census definition, this category includes all other responses not included in the White, Black or African American, American Indian or Alaska Native, Asian, and Native Hawaiian or Other Pacific Islander race categories. Respondents reporting entries such as multiracial, mixed, interracial, or a Hispanic or Latino group (for example, Mexican, Puerto Rican, Cuban, or Spanish) in response to the race question are included in this category. When tabulated with 2010 data, fewer people identified with the “two or more races” when given the option to choose “other race”. The greatest concentrations are located in tracts 4.00, 5.00, 12.00, 13.00, 16.00, and 18.00 which cover nearly all of West and South Rome.

**Figure 3: Other Race Population in City of Rome**



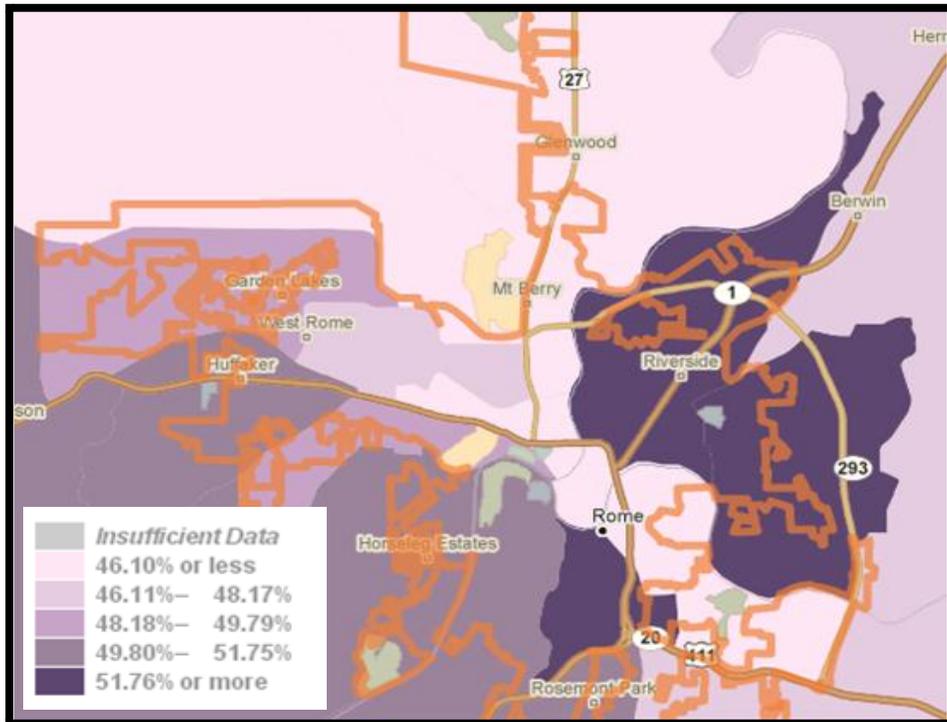
Source: www.policymap.com

The proportion of males versus females in the City of Rome has remained consistent since 2000. The following table shows that in 2010, the concentration of males in the city was 48.6% and the average concentration of females was 52.4%. Figure 4 and Figure 5 illustrate the concentration of males and females in regard to census tracts. The greatest concentration of females is found in tracts 3.00, 4.00, and 5.00, in West Rome and tract 18.00 in South Rome. The higher concentrations in these areas could be caused by a couple of contributors. The female-headed household percentages increased between 2000 and 2010, thus the households could be located in the corresponding tracts. Women tend to live longer than men; because of this, these areas of higher concentration could also credit “naturally –occurring retirement communities”. It is worth noting that tracts 5.00 and 18.00 are also tracts with a low median income.

**Table 10: City of Rome’s Historic Gender Composition**

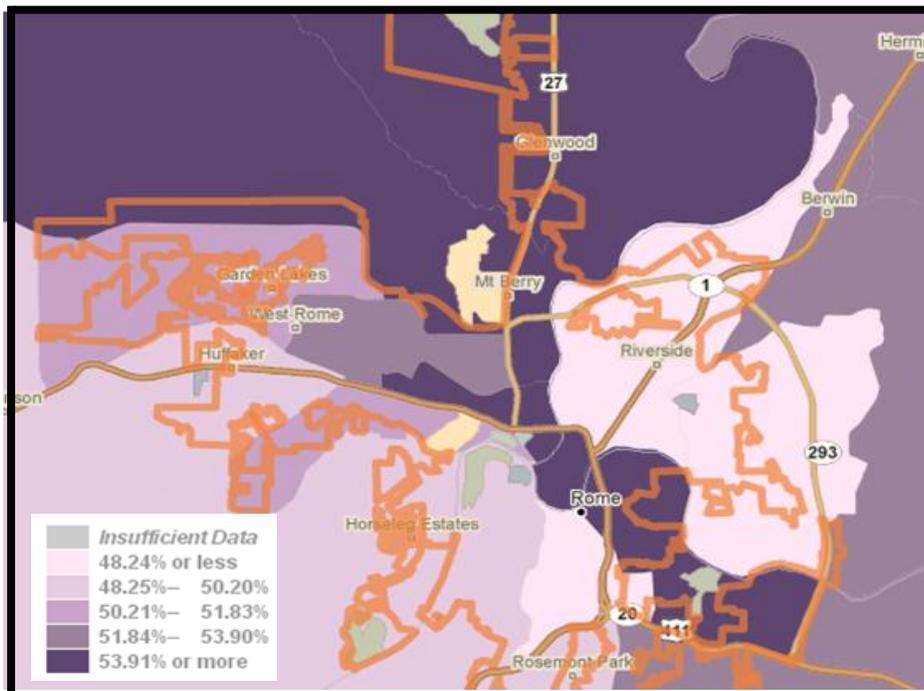
City of Rome Historic Gender Composition					
	Total Population	Male		Female	
2000	34,980	16,586	47.4%	18,394	52.6%
2010	36,303	17,285	48.6%	19,018	52.4%

**Figure 4: Male Concentrations in the City of Rome**



Source: [www.policymap.com](http://www.policymap.com)

**Figure 5: Female Concentrations in City of Rome**



Source: [www.policymap.com](http://www.policymap.com)

The census data between 2000 and 2010 shows small variations in the makeup of families throughout the City of Rome. Most changes can be attributed to normal growth in population, but the approximate 2% increase in female-headed households with and without children coincides with the approximate 3% decrease of married households with and without children.

**Table 11: Familial Status in City of Rome**

Familial Status in City of Rome				
Household Type	2000		2010	
Total Households	13,320		13,885	
Families	8,438	63.3%	8,612	62%
Families w/ Children	3,873	29.1%	4,001	28.8%
Married Couple Families	5,489	41.2%	5,262	37.9%
Married Couple Families w/ Children	2,340	17.6%	2,185	15.7%
Female HH, no Husband	2,265	17%	2,663	19.2%
Female HH, no Husband, w/ Children	1,252	9.4%	1,529	11%
Non-Family Household	4,882	36.7%	5,273	38%
HH Living Alone	4,116	30.9%	4,462	32.1%
HH Living Alone [over 65 years]	1,875	14.1%	1,766	12.7%

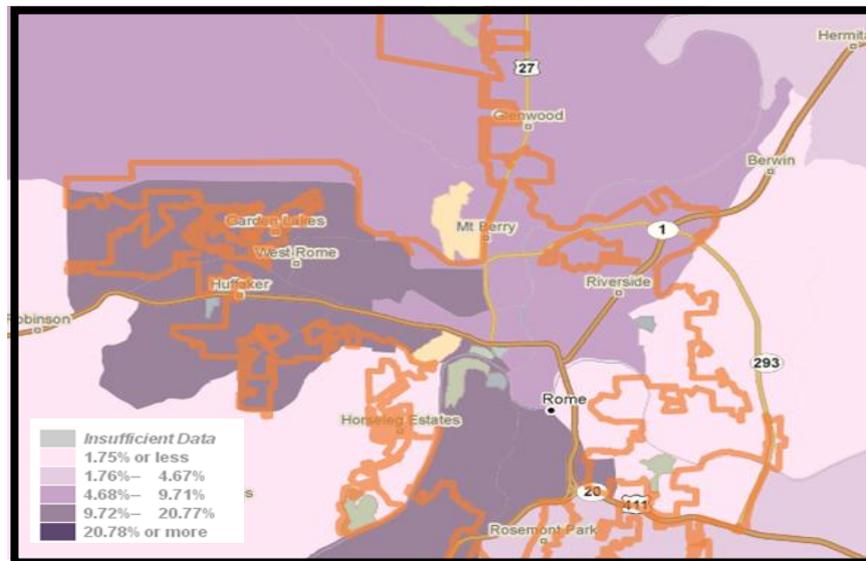
According to the 2007-2011 ACS estimates, 11% of the City's population was born in foreign countries. The majority of the foreign born population (82.7%) was from Latin America.

**Table 12: National Origin of Residents in City of Rome**

Selected Social Characteristics in the United States		
National Origin	Population	Percentage
Foreign Born population	4,005	100%
Europe	84	2%
Asia	578	14.4%
Africa	23	0.6%
Oceania	0	0%
Latin America	3,312	82.7%
Northern America	8	0.01%

Source: 2007-2011 American Community Survey 5-Year Estimates

**Figure 6: Foreign Born Population Map**



Source: www.policymap.com

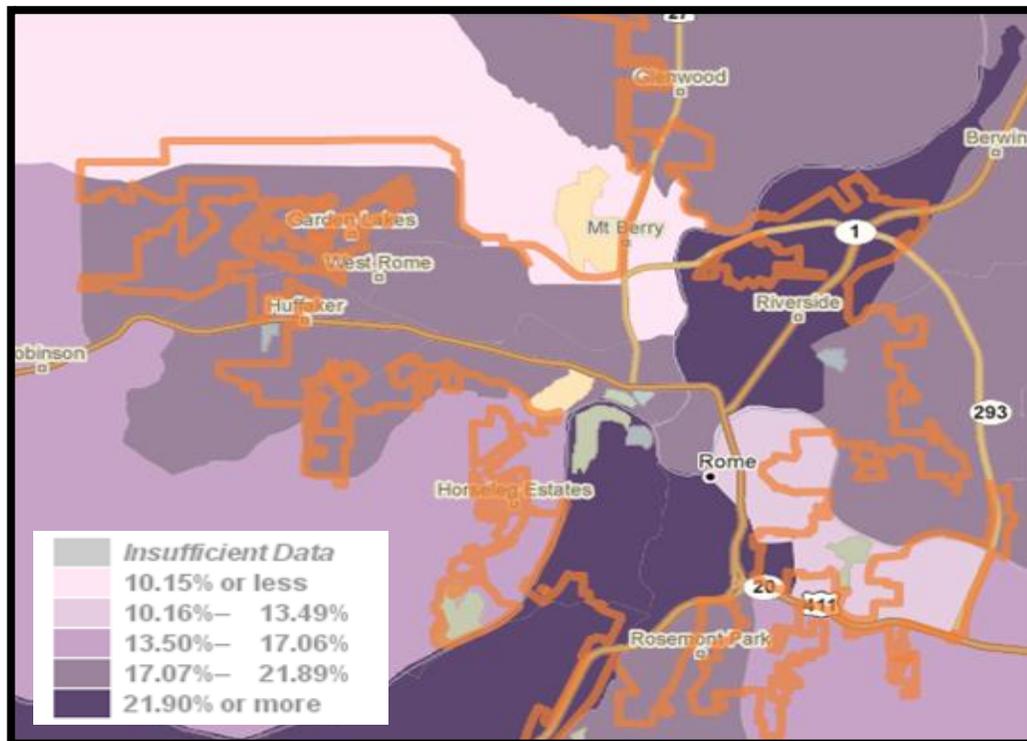
The 2009-2011 ACS estimates show that approximately 58.9% of the City’s civilian, non-institutionalized population aged 18 to 64 was disabled. The disabled population was most concentrated in North and East Rome throughout Census tracts 6.00 and 8.00 and in South Rome throughout tracts 16.00 and 18.00.

**Table 13: Disability Status in City of Rome**

Selected Social Characteristics in the U.S.		
Total Civilian Non-institutionalized Population	35,259	100%
With a disability	6,249	17.7%
18 to 64 years	20,778	58.9%
With disability	3,525	9.9%

Source: 2009-2011 American Community Survey 3-Year Estimates

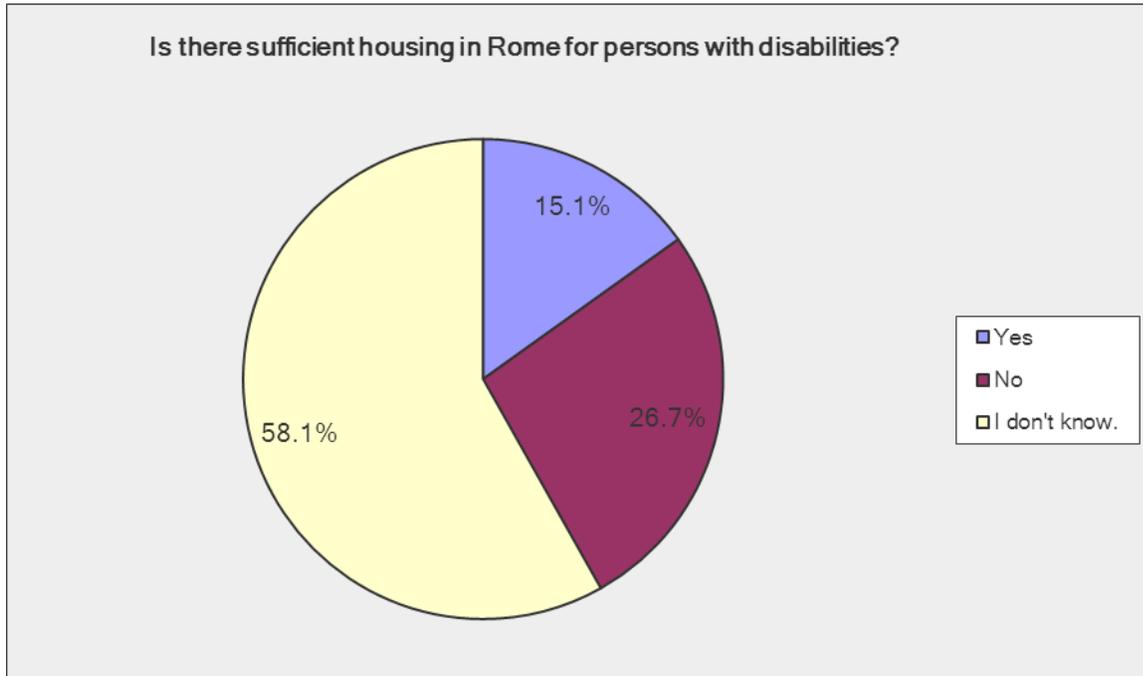
**Figure 7: Disabled Persons Age 18-64 Population Map**



Source: [www.policymap.com](http://www.policymap.com)

Table information presented below states that over 58% of survey respondents do not know if housing is available for residents with disabilities. Over 25% of survey respondents said that there are not sufficient housing opportunities for persons with disabilities.

**Table 14: Housing for Persons with Disabilities**



## Segregation Analysis

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This Segregation Analysis is intended to determine the degree to which residents of Rome were segregated by race and ethnicity. The primary data sources were the Census 2000 and 2010 Summary Files 1. The period of analysis spanned from 2000 to 2010.

Residential segregation is the degree to which two or more racial or ethnic groups live geographically separate from one another. Early in the field of residential segregation analysis, Duncan and Duncan<sup>13</sup> defined a “dissimilarity index” which became the standard segregation measure for spatial segregation. This analysis will use these methodologies set forth by Duncan and Duncan for the measurement of evenness of the population distribution by race using the dissimilarity index (DI). Workers in the field generally agree that, properly applied, the DI adequately captures the degree of segregation between racial and ethnic groups. This measure has the advantage of frequent use in segregation analyses and is based on common sense notions of the geographic separation of population groups.

The DI methodology requires that each demographic group be distinct from each other so there can be no overlap of a racial (Blacks, Whites, and Asians) or ethnic (Hispanic) group. This study focuses on the four largest of these groups: Hispanics, Non-Hispanic Whites, Non-Hispanic Blacks, and Non-Hispanic Asians (to be called “Whites,” “Blacks,” and “Asians” for simplicity). The table below presents population counts for each race and the Hispanic ethnicity for the city of Rome.

**Table 15: Rome, GA Race & Ethnicity**

<b>RACE AND ETHNICITY ROME, GEORGIA</b>	
<b>Race or Ethnicity</b>	<b>Count</b>
<b>One Race and Not Hispanic:</b>	
White	18,974
Black or African American	9,991
Asian	690
American Indian and Alaska Native	88
Some Other Race	73
Native Hawaiian and Other Pacific Islander	17
<b>Ethnicity:</b>	
Hispanic or Latino	5,892
<b>TOTAL CITY POPULATION</b>	<b>36,303</b>

Source: 2010 U.S. Census Summary File 1

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<sup>13</sup> Duncan, Otis D., and Beverly Duncan. 1955. “A Methodological Analysis of Segregation Indices.” *American Sociological Review*, Vol. 20.

The DI indicates the degree to which a minority group is segregated from a majority group residing in the same area because they are not evenly distributed geographically. When calculated from population data broken down by race or ethnicity, the DI represents the proportion of minority members that would have to change their area of residence to achieve an even racial or ethnic distribution. The DI ranges from 0.0 (complete integration) to 1.00 (complete segregation). A commonly accepted rule of thumb is that a DI value between 0.30 and 0.60 is taken to indicate a moderate level of segregation and above 0.60 indicates a high level of segregation.

Overall, the DI calculations for Rome showed a decline in segregation between most racial and ethnic groups during the period 2000-2010 (an average of 7.7%) but still remained in the range (0.30 < DI < .60) described by most workers in the demographics field as modestly segregated. Of the six racial-ethnic groups in this analysis, segregation declined for four pairs, one pair increased (White and Hispanics), and essentially remained steady for Blacks and Hispanics. The table below presents the results of these calculations between non-Hispanic Whites, non-Hispanic Blacks, non-Hispanic Asians, and Hispanics<sup>14</sup> in the City. The below graph presents the same data in a visual format so that trends can be more readily identified.

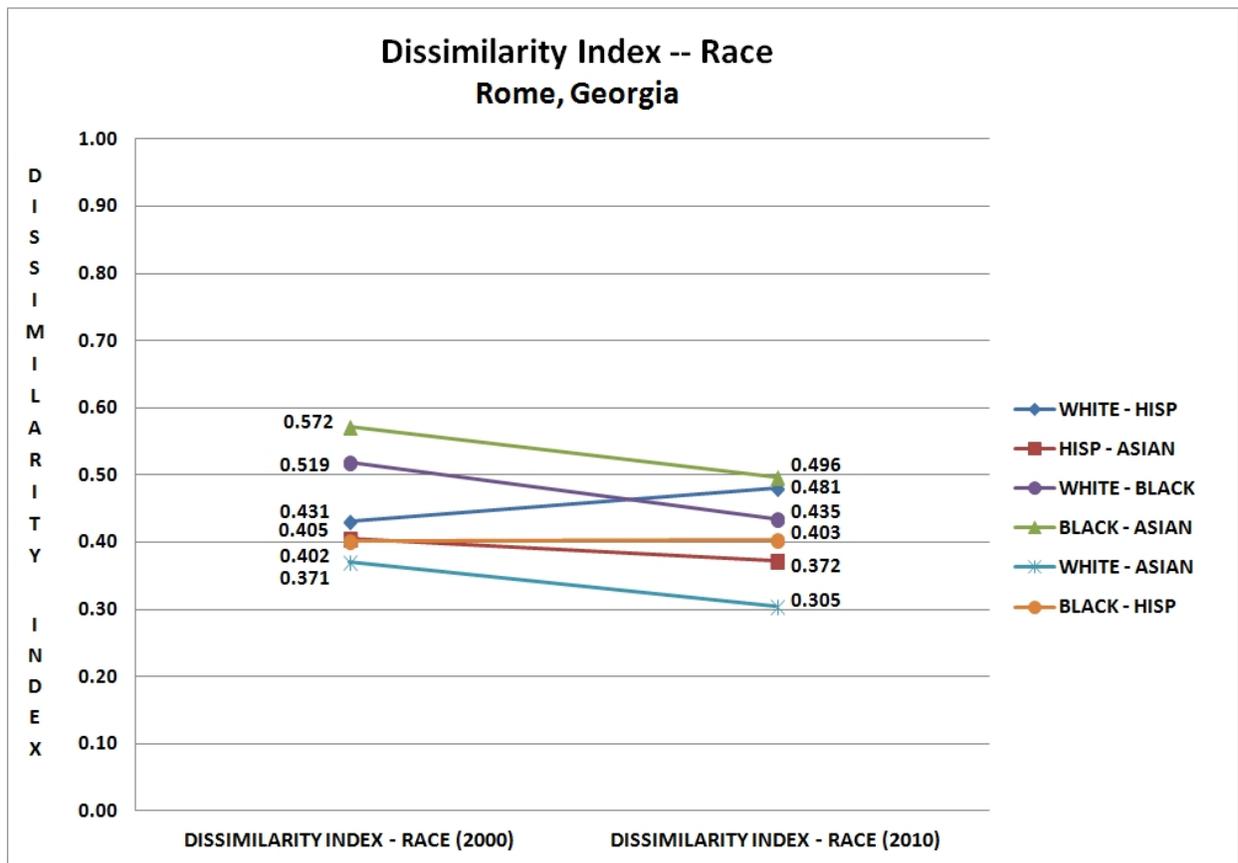
**Table 16: Race Dissimilarity Index 2000-2010**

<b>DISSIMILARITY INDEX ROME, GEORGIA</b>		
<b>GROUP EXPOSURE</b>	<b>DISSIMILARITY INDEX - RACE (2000)</b>	<b>DISSIMILARITY INDEX - RACE (2010)</b>
<b>WHITE - HISP</b>	<b>0.431</b>	<b>0.481</b>
<b>HISP - ASIAN</b>	<b>0.405</b>	<b>0.372</b>
<b>WHITE - BLACK</b>	<b>0.519</b>	<b>0.435</b>
<b>BLACK - ASIAN</b>	<b>0.572</b>	<b>0.496</b>
<b>WHITE - ASIAN</b>	<b>0.371</b>	<b>0.305</b>
<b>BLACK - HISP</b>	<b>0.402</b>	<b>0.403</b>

Sources: 2010 and 2000 U.S. Census Summary File 1

**Table 17: Race Dissimilarity Index 2000-2010**

<sup>14</sup> William H. Frey and Myers Dowell. 2005. "Racial Segregation in US Metropolitan Areas and Cities, 1990-2000 Patterns, Trends, and Explanations." Report 05-573, Population Studies Center, University of Michigan.



Sources: 2010 and 2000 U.S. Census Summary File 1

The table and graph above show that the DI between Whites and Blacks was 0.519 in 2000 declining to 0.435 in 2010, a drop of 16.2%. This can be interpreted as meaning that in 2010 43.5% of Black residents would have had to move to White areas for a totally even racial distribution which would have completely eliminated Black and White segregation in the city. Several other groups—Whites and Hispanics, Hispanics and Asians, Blacks and Asians, and Blacks and Hispanics—fell into the mid-range of segregation both in 2000 and 2010.

Segregation in Rome was at a minimum between Whites and Asians: 0.371 in 2000 and 0.305 in 2010. This value for the DI in 2010 is very close to the range below which the groups can be considered as effectively desegregated. In 2000, segregation was highest (0.572) between Black and Asian groups. This level of DI was borderline highly segregated. By 2010 the DI had lessened to 0.496, comfortably in the moderate range.

In summary, according to the DI computations, segregation in Rome was in the moderate range during the 2000 and 2010 period but was generally falling. Only in the case of Whites and Hispanics did segregation increase (by 11.4%) but still remained within modest segregation levels. The cause of this increase was due to the enormous growth in the Hispanic population (over 90%) during this period compared to the negligible growth in the White population (less than 1.0%). Much of the Hispanic surge likely led to larger

ethnic enclaves with a consequent decrease in the geographic evenness of the population distribution.

The literature provides several similar equations for the calculation of the DI, the one below being the most commonly used. This equation differences the magnitude of the weighted deviation of each census tract's minority share with the tract's majority share which is then summed over all the tracts in the region.<sup>15</sup>

$$D = \left(\frac{1}{2}\right) \sum_{i=1}^n \left| \frac{Min_i}{Min_T} - \frac{Maj_i}{Maj_T} \right|$$

**where:**

**D** = Dissimilarity Index

**Min<sub>i</sub>** = Minority group population of census tract i

**Min<sub>T</sub>** = Minority group regional population

**Maj<sub>i</sub>** = Majority group population of census tract i

**Maj<sub>T</sub>** = Majority group regional population

**n** = Total number of census tracts in the Region.

Note that the regional proportion of the minority population can be small and still not be segregated if evenly spread among tracts. Evenness, and the DI, are maximized and segregation minimized when all small areas (census tracts in this analysis) have the same proportion of minority and majority members as the larger area in which they. Evenness is not measured in an absolute sense, but is scaled relative to some other group. Segregation is maximized when no minority and majority members occupy a common area.

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<sup>15</sup> Calculation after Desegregation Court Cases and School Demographics Data, Brown University, Providence, Rhode Island. Source: <http://www.s4.brown.edu/schoolsegregation/desegregationdata.htm>.

# Public Investment & Infrastructure

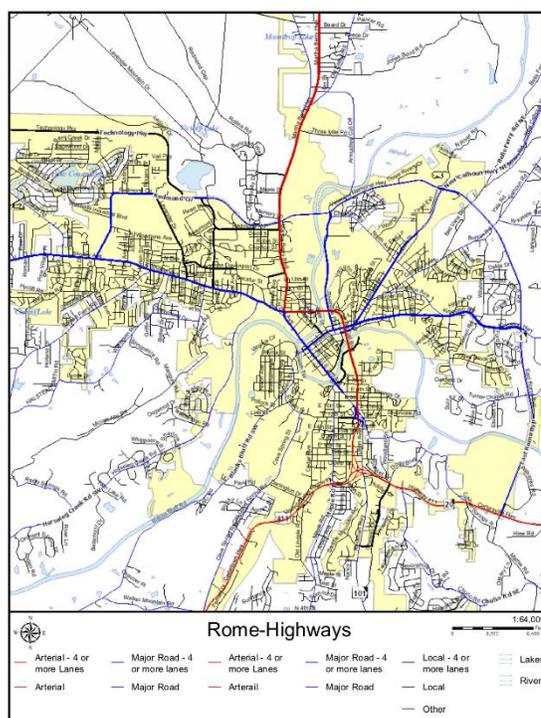
## Transportation

Varied transportation routes and options are essential to furthering fair housing within a jurisdiction. The issue at hand regarding the connection between transportation and fair housing choice focuses on the ease with which residents that live in lower-income or minority-concentrated areas can travel back and forth between work and home, and the availability of different transportation options that citizens of these neighborhoods may have to travel to other areas of the city as needed. When transportation routes do not connect concentrated areas of lower-income or minority households to commercial areas, then a majority of lower-income and minority residents are limited to where they may shop for goods or services, attend school, or where they can seek employment. Sound infrastructure is important to ensuring that all residents in an area have access to transportation throughout the city.

Rome has one arterial roadway, Highway 27, running through the center of the city from the North, connecting the city to Dalton. This highway splits in South Rome, as displayed on the above map in red, connecting it to nearby cities like Cartersville by Highway 20 and Cedartown through continuation of Highway 27. Other major highways, including a bypass around East Rome, are outlined in blue, offering a visual representation of the highway transportation network that is available to Rome residents. From the map displayed here, it is clear that there is major road access available throughout the city.

The availability of public transportation plays a vital role in increasing access to the supply of affordable housing to groups in need and others protected by fair housing laws. When residents have access to an effective public transportation system, they are able to easily travel between home and work or other destinations without having to add personal vehicle expenses to their household budget, which is a particular advantage to lower income families. When these services are widely utilized by city residents, transit systems can contribute to cutting down on traffic as well as air pollution.

**Figure 8: Rome, GA Highway Map**



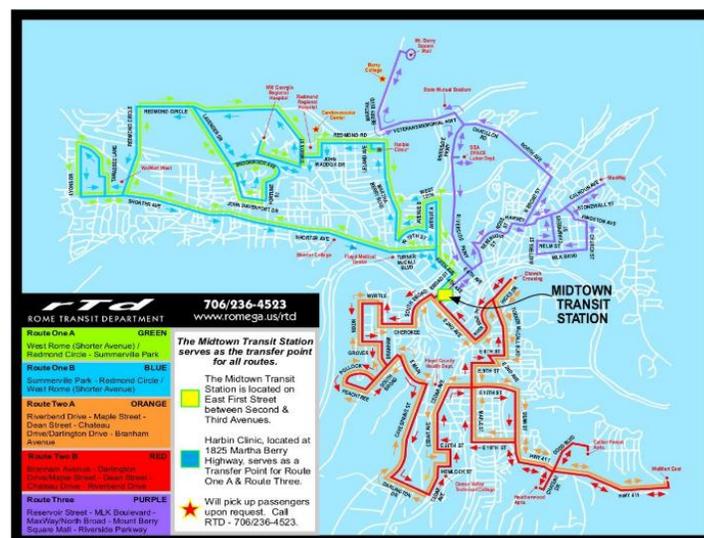
Source: <http://gis.rome.ga.us/app/>

The City of Rome Transit Department was established in 1961 after receiving a major donation from Georgia Power Company that consisted largely of a bus fleet. Georgia Power also gave the city the rights to its tools, spare parts, equipment, plus a \$300,000 donation towards public transportation in the city.<sup>16</sup> The five bus routes shown below match highway and major road network patterns from Rome’s highway map. Routes for 1-A (outlined in green) and 1-B (outlined in blue) follow the same road patterns but in opposite directions and provide transportation from the central part of Rome extending to the western part of the city. Routes for 2-A, (outlined in orange) and 2-B (outlined in red) run in opposite directions to transport residents living between the central and southern part of the city. Route 3 (highlighted in purple) runs between the central part of the city through the northeastern section of the city.

The transit system offers services Monday through Friday starting at 5:40 am and running through to 6:30 pm. While this schedule accommodates the typical 8:00 am to 5:00 pm business and work hours, residents working evening or other shifts would not likely have access to the transit system when they are traveling to or from work.

Transit rates start at \$1.25 for full fare. Transfer rides where a resident may need to switch buses for a different route are free of charge. Payment plan options are available so that riders can purchase a plan for either 10 rides for \$22 or 50 rides at \$107.50. Senior citizens, students and those with disabilities are given discount rates of \$0.60. Senior citizens and residents with disabilities may also apply for the city’s para-transit service which offers curb-to-curb pickup and delivery with no extra fare charge.

**Figure 9: Rome, GA Transit Department. Main Line Route Map**



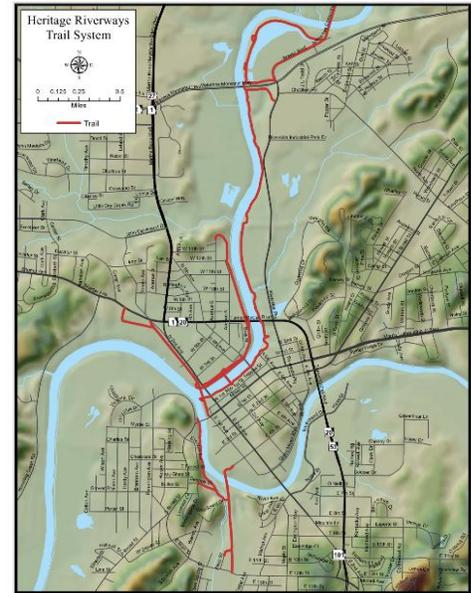
Source: <ftp://ftp.rome.ga.us/Transit/RTD%20Map.JPG>.

Bus services offer an alternative for Rome residents to get to work on a daily basis, go to local healthcare centers, and make trips to run errands throughout the city. The variety of routes offered and the coverage throughout the city indicates that the public transit system offers Rome residents an effective means of transportation to travel between work and home, as long as those points are within the city. Public transportation to areas of Floyd County outside Rome city limits is significantly more limited.

Rome residents have access to alternative forms of transportation, such as walking and bicycling, through the extensive network of trails that run through the city. These trail networks are primarily maintained for recreational purposes and may not be the prime option for a resident's daily work commute; however, the presence of these facilities does expand the options available to residents. The Heritage Riverways Trail System extends through central Rome, offering residents over 11 miles of trail for biking, walking and running through the center of the city.<sup>17</sup> This trail system is just one example of a network of trails that extend throughout Rome and Floyd County. Additionally, the Etowah, Oostanaula, and Coosa rivers that join in the center of Rome offer 85.5 miles of canoe trail that stretches from Rome to other parts of Floyd County and beyond.<sup>18</sup> While census data shows that a majority of residents prefer to travel by vehicle, Rome has a rare asset in its extensive trails and waterways.

The 2010 Census data reflects that a majority of the residents in Rome prefer traveling by private vehicle in their commutes to work. Also in 2010, the average work commute was 18 minutes for residents of Rome.<sup>19</sup> This was 9 minutes shorter than the average Georgian's daily commute at 27 minutes. Almost 90% of the 13,999 employed Rome residents preferred driving a private vehicle between home and work, with 72% percent of drivers traveling alone while the other 18% of these drivers carpoled.

Figure 10: Rome Trail System



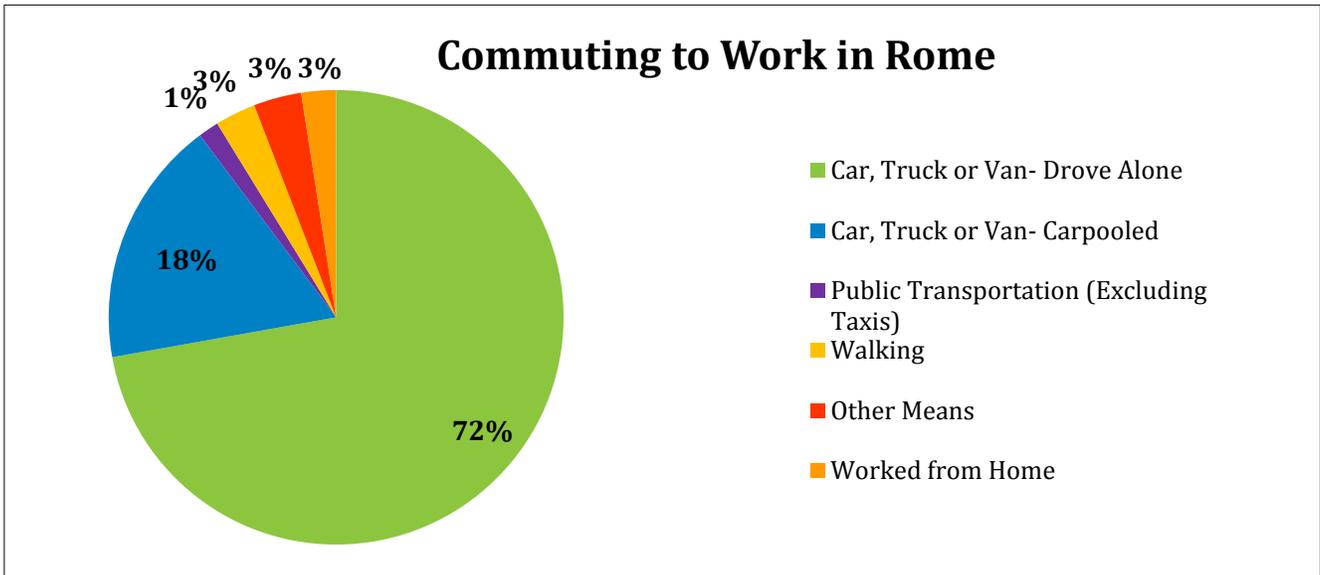
Source:  
<http://www.romefloyd.com/QualityofLife/TrailSystem/tabid/316/Default>

17 Trails for Recreation and Economic Development. <http://tredromefloyd.org/>.

18 Rome and Floyd County Trail Facilities Plan. Rome-Floyd County Planning Department. 2008.

19 U.S. Census Bureau, American Community Survey, 2007-2011. [www.census.gov](http://www.census.gov)

**Table 18: Commuting to Work in Rome**

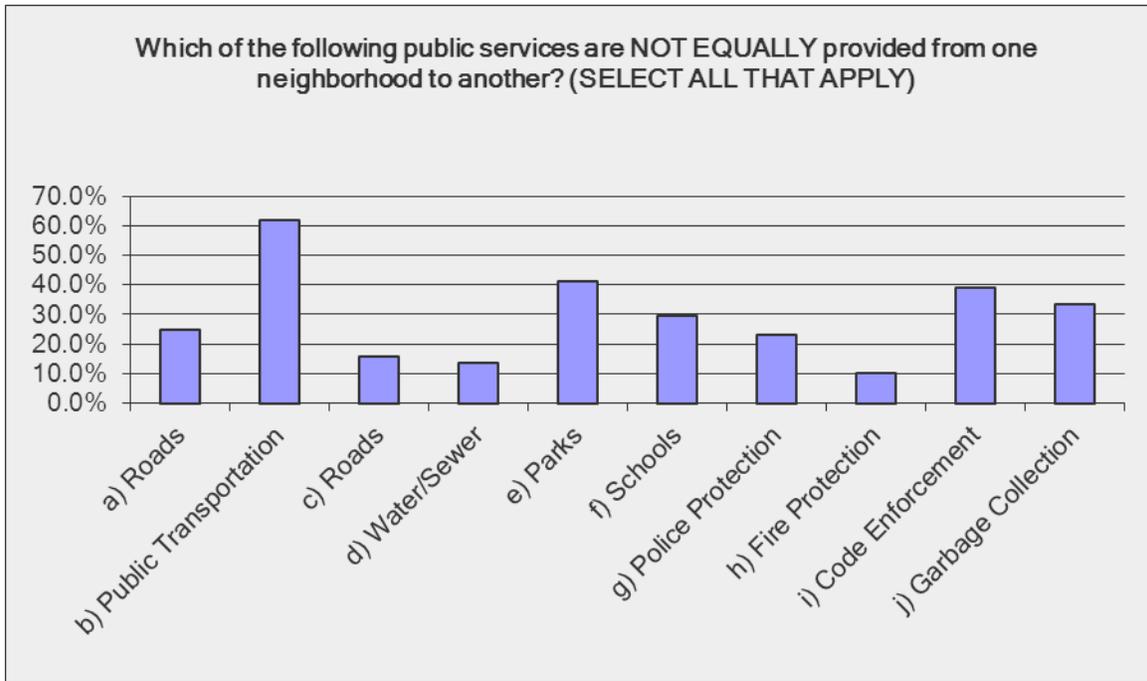


U.S. Census Bureau, American Community Survey, 2007-2011. [www.census.gov](http://www.census.gov)

Almost 40% of households had access to only one vehicle and approximately 15% of households had no access to a private vehicle. This may explain the relatively large portion of residents that carpool on a daily basis or choose an alternative form of transportation in comparison to driving alone in their private vehicle. According to the 2007-2011 American Community Survey, 1% of residents utilized public transportation offered by the city, 3% of residents made their daily commute by walking, 2% of residents worked from home and the last 3% traveled by other means.

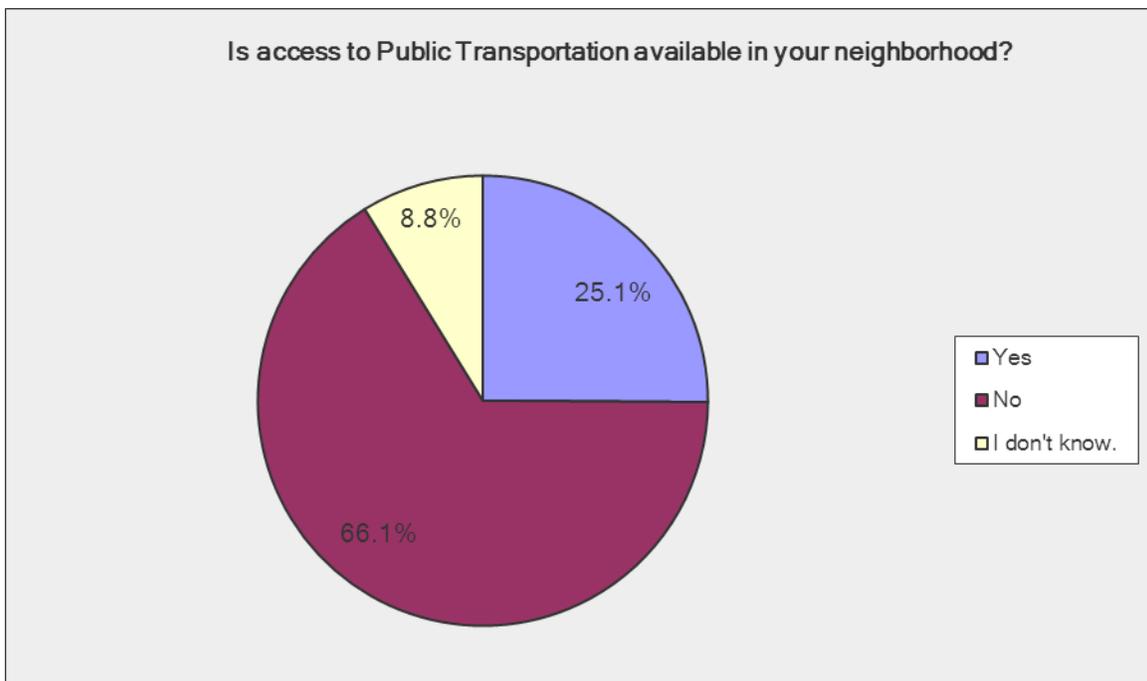
The table shown below reflects that over 60% of survey respondents believe that public transportation is not provided equally throughout Rome as a part of this analysis. As transit routes mirror patterns of the highway and road system, some residents that live further away from a transit route may have a harder time getting access to this source of transportation.

**Table 19: Public Service Provisions**



The table below also reflects that many survey respondents do not have public transportation services available in their neighborhoods, however these results may reflect the views of residents who live in the area, but outside Rome city limits.

**Table 20: Public Transportation Availability**



## Water & Sewer

The water and sewer infrastructure of a city is very important when it comes to furthering fair housing as it may impact where new construction housing is placed as well as which residents of a city are being provided with particular public services. If predominantly minority households or neighborhoods are not being provided the same access to water or sewerage services as predominantly White households or neighborhoods, there is potential for the disparities to be considered discriminatory.

The City of Rome is responsible for managing the sewerage system and water treatment within the city limits of Rome as well as other parts of Floyd County including Lindale, Shannon, Coosa, and Armuchee. Sanitary sewer lines as well as water line utilities span between city limits, allowing city residents to be connected to these services. In all, the Rome Water and Sewerage Division serves about 50,000 people.<sup>20</sup> According to the 2007-2011 American Community Survey, 133 of 13,424 occupied housing units (1%) did not have access to complete plumbing facilities.

The City of Rome Water & Sewer Division treats water that flows in and out through the Coosa River Basin which is comprised of the Etowah and Oostanaula rivers that converge to form the Coosa River. Sewerage systems are made up of 400 miles of sewer mains and 43 lift stations. Two sewage collection systems distribute sewage between the Coosa Water Reclamation Facility and the Rome Water Reclamation Facility. The Rome facility has the capacity to treat 36 million gallons of water per day while the Coosa facility can treat 2 million gallons. Both facilities apply double treatment to the water before discharging it into the Coosa River.<sup>21</sup>

The Bruce Hamler Water Treatment Facility provides treatment and overall quality of water in Rome for drinking, cleaning, and overall household use. This facility has the capacity to treat 18 million gallons of the water it takes in daily from the Etowah and Oostanaula Rivers. One problem with water resources in Rome is that a large portion of water coming in from the Etowah River is pumped into the Chatahoochee River through a process called 'interbasin transfer' to serve the large population of Atlanta. This process causes constant changes to the natural size and course of the river and along with pollution has caused an increasing threat of endangerment to many species of fish and other wildlife, some of which are endemic to the Coosa River Basin.

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20 Sewer Capacity Management Operation Maintenance (CMOM) Biannual Report-1. City of Rome Water and Sewer Division. 2013.

21 Rome Sewer Collection and Water Reclamation Facilities.  
<http://www.romefloyd.com/Infrastructure/Sewer/RomeCity/>

## Education

A quality education allows children the opportunity to gain the basic knowledge and life skills that they will need in order to succeed through school and once they enter adulthood. It is important that children are provided with equal access to a quality education regardless of where they live. Jurisdictions must be vigilant in making sure that all children in the community are provided with a fair chance to receive a quality public education.

Like many cities of its size, the City of Rome has its own public school system that is a separate entity from the Floyd County public school system. Each school system has its own board of education and superintendent. For the purpose of this analysis, both the city and county school districts are examined because some Floyd County schools are located within Rome city limits. Floyd County Schools and City of Rome Schools are also both top employers in the area. Rome City School District has approximately 750 employees while Floyd County has over 1,520 employees.

In 2012, Georgia became one of ten states given exemption from meeting Adequate Yearly Progress (AYP) requirements under the No Child Left Behind Act. The replacement state school performance scale, known as the College and Career Ready Performance Index (CCRPI) tracks yearly progress and achievement toward annual goals set by the state. These annual goals are based on factors such as graduation expectancy and past year performance. The table below displays the student population numbers (K-12) for both districts as well as their CCRPI scores in comparison to the overall state score.

**Table 21: Student Population & Enrollment**

School District	Student Population	CCRPI Score	Georgia CCRPI Difference (83.4)	State Enrollment Rank & (%)
Rome City School District (K-12)	5,650	80.1	-3.3	131 (90.2%)
Floyd County School District (K-12)	10,481	82.7	-0.7	95 (92.8%)

Sources: 2007-2011 American Community Survey 5- Year Estimates, U.S. Census Bureau. [www.census.gov](http://www.census.gov). College & Career Ready Performance Index. Georgia Department of Education. [ccrpi.gadoe.org/2012/](http://ccrpi.gadoe.org/2012/)

Rome City School System has 5,650 students enrolled from Kindergarten to 12th grade. It scored an 80.1 on the CCRPI which is 3.3 points less than the average state score of 83.4. The City's school system also ranks 131st out of 195 in Georgia with student enrollment at

90.2%. Public school enrollment percentage may be offset by private and home school enrollment numbers. The Rome City School District has 7 elementary schools: East Central, Elm Street, Main, North Heights, Southeast, West Central, and West End. There is also one middle school, Rome Middle, and one high school which is also named for the city. Each school in the Rome City School District is designated a Title I school. A Title I school is defined as a school that meets criteria to receive federal funds due to having a high percentage of low-income students who are at risk of not meeting the state academic standards.

The Floyd County School District has 4 primary schools and 7 elementary schools. Primary schools differ from elementary schools in that they only consist of Kindergarten through 2nd grade. The primary schools are: Glenwood, McHenry, Midway, and Pepperell. The 7 elementary schools are: Armuchee, Alto Park, Cave Spring, Garden Lakes, Johnson, Model, and Pepperell. There are also 4 middle schools and 4 high schools, each named Armuchee, Coosa, Model, and Pepperell. Four of the seven elementary schools and 3 of the primary schools qualify as Title 1 recipients. The total number public school students enrolled for Floyd County is 10,481. The county also came within 0.7 points of meeting the state CCRPI score at 82.7 and had a higher state enrollment ranking than the city at 95th out of 195 with almost 93% enrollment.

Table 22: Student Demographics

2010 Student Demographics							
	White	African American	Asian	Hispanic	Graduation Rate	Dropout Rate	Economically Disadvantaged
<b>Rome City School District (K-12)</b>	57.35%	27.75%	1.91%	16.23%	72.1%	2.0%	2.7%
<b>Floyd County School District (K-12)</b>	88.7%	5.94%	0.93%	5.16%	76.8%	2.7%	3.5%
<b>State of Georgia (K-12)</b>	59.74%	30.46%	3.25%	8.81%	84%	3.6%	3.8%

Sources: 2007-2011 American Community Survey 5- Year Estimates, U.S. Census Bureau. [www.census.gov](http://www.census.gov). Three Year Comparison Report Card. Georgia Department of Education. <http://archives.gadoe.org/>. Public School District Population and Races for City of Rome and Floyd County. <http://www.usa.com/>.

The table shown above displays the demographic breakdown of both school districts compared with the state of Georgia’s demographics. There was a much higher percentage

of Whites in Floyd County School District than in the Rome City School District. There was a smaller population of African Americans in both the City and County school districts than in other school districts in Georgia. In both the Rome and Floyd County school districts, there was a much smaller concentration of Asian students than in other Georgia school districts. The City of Rome School District had almost double the percentage of Hispanic students than the state average while the Floyd County district had a concentration of Hispanic students lower than the state average.

The 2007-2011 American Community Survey recorded a graduation rate of 72.1% for Rome City School District and 76.8% for Floyd County School District. Both percentages fall behind the state average graduation rate in 2010 of 84%. Both Rome and Floyd County have lower dropout rates at 2% and 2.7%, respectively. The state dropout rate in 2010 was 3.6%. Compared with the state average, both districts also had lower rates of economically disadvantaged students in 2010. An economically disadvantaged student is defined as a student who is a member of a household that meets income eligibility guidelines for free or reduced-priced meals (less than or equal to 185% of Federal Poverty Guidelines) under the National School Lunch Program. The population of economically disadvantaged students is also a factor in determining whether a school may qualify as Title I.

## Land Use & Zoning

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Comprehensive planning is a critical means by which governments address the interconnection and complexity of their respective jurisdictions. The interconnectedness of land uses means that a decision as to the use of a particular piece of property has consequences not only for the surrounding property, but for a myriad of other issues as well. For example, a decision to use a parcel of land for development of a shopping mall (a land use decision) will alter the values and uses of surrounding property. The same decision may also impact traffic patterns or increase environmental concerns by increasing impervious areas and runoff. For this reason, “(t)he land-use decisions made by a community shape its very character – what it’s like to walk through, what it’s like to drive through, who lives in it, what kinds of jobs and businesses exist in it, how well the natural environment survives, and whether the community is an attractive or an ugly one.” By extension, decisions regarding land use and zoning have direct and profound impacts on affordable housing and fair housing choice, as will be discussed within this section.

From a regulatory standpoint, local government measures to control land use through zoning often define the scope and density of housing resources available to residents, developers and other organizations within certain areas. Examples of zoning provisions that most commonly result in impediments to fair housing choice include the following:

- Restrictive forms of land use that exclude any particular form of housing, particularly multi-family housing, or require larger lot sizes that deter affordable housing development.
- Restrictive definitions of family that impede unrelated individuals from sharing a dwelling unit.
- Placing administrative and siting constraints on group homes.

Land development activities in the City of Rome are regulated through the Unified Land Development Code of Floyd County and the City of Rome. This joint county-city code establishes zoning provisions. The zoning code was originally adopted in 2001 and most recently amended in 2013.

The following table provides a comprehensive listing of residential zoning districts as established and regulated through the code:

**Table 23: City of Rome Residential Zoning Districts**

<b>Established Residential Zoning Districts By Type</b>	
<b>A-R</b>	Agricultural Residential
<b>S-R</b>	Suburban Residential
<b>HT-R</b>	High Density Traditional Residential
<b>LT-R</b>	Low Density Traditional Residential
<b>D-R</b>	Duplex Residential
<b>M-R</b>	Multifamily Residential

The single family residential zoning districts (A-R, S-R, LTR, HTR and D-R) range in minimum lot size from 7,200 square feet to one acre, depending on the availability of public or private water and sewerage. Lots that are zoned for single family residential use but rely on public water and sewerage are allowed to be built much closer together and on smaller lots than those not served by public water and sewer infrastructure. Septic system drain fields and state health regulations requiring adequate separation between such drain fields and private wells both necessitate larger lot sizes for those homes on septic or well systems. While the greater land area of these lots may result in greater land cost, the majority of Rome is served by public water and sewer infrastructure, making this a relatively minor concern.

It is imperative that, while examining single-family zoning districts, setback requirements be reviewed as they have a direct impact on how large a lots building area will be. With one exception, the setback requirements are uniform throughout both of the single-family zoning districts. The only difference is that in the S-R districts, a single-family home or duplex can be developed with a 40 foot setback from a major street while no development is permitted along a major street within the D-R districts. Residents of Rome do have the ability to have the setbacks varied by the Board of Adjustment Action in the event of unusual lot dimensions or other hardships.

The City of Rome only has two dedicated multi-family residential district (D-R and M-R). This district is the only district that permits the building of multi-family dwellings and such development is limited to a maximum of 14 units per acre. Multi-family development is further limited by the codes requirements for landscaping, buffering, and provisions for

access and open space when in proximity to single-family or traditional-residential districts.

Traditional residential districts (HT-R and LT-R) provide potential options for affordable, single-family housing development. Like the M-R districts, these districts also impose a maximum of 14 units per acre, but both the HT-R and LT-R are defined to mirror traditional neighborhood design where streets are laid out in a grid pattern with sidewalks and neighborhoods are conveniently located near local shopping areas. The neo-traditional neighborhood style is ideal for low- to moderate-income families due to the ability for a family to work, live, and shop within a close proximity of one another, minimizing transportation costs. The traditional residential districts do allow for the development of duplex units by special permit.

### **Zoning Code Review**

Because the local zoning code presents a crucial area of analysis for a study of impediments to fair housing choice, the Rome-Floyd County Development Code was obtained and reviewed against a set of fair housing issues. For each issue, the ordinance was assigned a risk score, with the possible scores defined as follows:

1 = low risk – the provision poses little risk for discrimination or limitation of fair housing choice;

2 = medium risk – the provision is neither among the most permissive nor most restrictive; while it could complicate fair housing choice, its effect is not likely to be widespread;

3 = high risk – the provision causes or has potential to result in systematic and widespread housing discrimination or the limitation of fair housing choice.

The 18 individual risk scores were averaged together, yielding a composite score indicative of the probability of the municipality's zoning ordinance, in general, to limit fair housing choice. The complete report is included as an appendix to this document, however, the composite scores lend themselves to comparative analysis here.

**Table 24: Zoning Code Issue Analysis**

ISSUE	RISK SCORE
1. Does the jurisdiction’s definition of “family” have the effect of preventing unrelated individuals from sharing the same residence? Is the definition unreasonably restrictive?	1
2. Does the definition of family discriminate against unrelated individuals with disabilities (or members of any other protected class) who reside together in a congregate or group living arrangement?	1
3a. Does the zoning ordinance require a use permit to locate housing for individuals with disabilities in certain residential districts? 3b. Is housing for individuals with disabilities allowed as of right only in a few residential zones?	3
4. Does the zoning ordinance unreasonably restrict housing opportunities for individuals with disabilities who require onsite supportive services?	2
5. Does the jurisdiction’s policies, regulations, and/or zoning ordinance allow persons with disabilities to make reasonable modifications or provide reasonable accommodation to specific zoning or regulatory requirements?	1
6a. Does the jurisdiction require a public hearing to obtain public input for specific exceptions to zoning and land-use rules for applicants with disabilities? 6b. Is the hearing only for applicants with disabilities rather than for all applicants?	2
7. Does the ordinance impose spacing or dispersion requirements on certain housing types, creating a disparate impact on certain populations?	1
8a. Are there any restrictions for Senior Housing in the zoning ordinance? 8b. If yes, do the restrictions comply with Federal law on housing for older persons (i.e., solely occupied by persons 62 years of age or older or at least one person 55 years of age and has significant facilities or services to meet the physical or social needs of older people)?	1
9. Does the zoning code distinguish senior citizen housing from other single family residential and multifamily residential uses by the application of a special or conditional use permit?	2
10. Does the jurisdiction restrict any inherently residential uses (such as shelters or residential treatment facilities) only to non-residential zones?	1
11. Does the ordinance include residential zones with high minimum lot sizes, wide street frontages, large setbacks, low FARs, large minimum building square footage, and/or low maximum building heights, effectively preventing affordable or multi-family housing?	2
12. Are unreasonable restrictions placed on the construction, rental, or occupancy of accessory structures (i.e. carriage house, guest house, basement unit) within residential districts?	1
13a. Does the ordinance fail to provide zones where multi-family housing is permitted as of right? 13b. Do multi-family districts restrict development only to low-density housing types?	1
14. Does the ordinance unreasonably restrict the siting of mobile, manufactured, and modular homes	3
15a. Is the process by which a use permit (CUP, SUP, SLUP) is obtained unreasonably lengthy, complex and costly, effectively discouraging applicants? 15b. Is there a clear procedure by which denials may be appealed?	1
16. Does the zoning ordinance include an inclusionary zoning provision?	2
17. Does the zoning ordinance include a discussion of fair housing?	2
18a. Do the jurisdiction’s codes presently make specific reference to the accessibility requirements contained in the 1988 amendment to the Fair Housing Act? 18b. Are the jurisdiction’s accessibility standards (as contained in the zoning ordinance or building code) congruent with the requirements of the Fair Housing Act? 18c. Is there any provision for monitoring compliance?	2

Overall the City of Rome scored an average of 1.61 in this analysis. The City's code scored very well regarding low administrative barriers to obtaining permits and delineation of procedures for appealing a rejected zoning or permit application.

However, Rome's ordinance was found to be restrictive on the rights of people with disabilities (with respect to personal care homes) and the siting of modular and manufactured homes.

### **Definition of Family**

One of the most scrutinized provisions of any municipality's zoning code is its definition of "family". Ideally, the definition does not unreasonably restrict the numbers of unrelated individuals permitted to live together in a single dwelling. In this regard, the City of Rome has an extremely permissive definition, allowing "an individual or two or more persons living together as a household".

### **Personal Care Home**

Rome's zoning code defines a personal care home as "a place of residence for adults where lodging, meals, and personal care are provided 24 hours per day, seven days per week and where federal and/or state licensing or permitting is required".

Per the Rome Zoning Code there are three different types of Personal Care Homes:

1. Family Personal Care Home, Individual or Family: A personal care home in a family type residence that is non-institutional in character and offers care for 1 to 4 adults.
2. Personal Care Home, Group: A personal care home that is non-institutional in character and offers care for 5 to 15 adults.
3. Personal Care Home, Congregate: A personal care home that offers care to 16 or more adults.

When the Northwest Georgia Regional Hospital in Rome closed, it created a large need for this type of development and care in the community. Despite a growing need, personal care homes located in residential districts are subject to special limitations or, in the case of homes serving five or more persons, to requirements for special use permitting. The code's classification of personal care home requirements by number of residents, when the code's "family" definition is not qualified similarly is problematic. For example, a single-family home for a family of five can be built without restriction or limitation in a S-R district, however, a home that is non-institutional in character where five people with disabilities reside and receive personal care would require special permitting before being allowed to locate in the same neighborhood. If the personal care home served four or fewer residents, it would not be subject to special use permitting, but would be subject to other limitations (e.g. limits on the degree to which the dwelling can be expanded and stipulations that

construction be consistent with the character and scale of the surrounding neighborhood) that are not also placed on other types of dwellings.

### **Mixed-Use Development**

The City of Rome's Zoning Code has a specialty designation for Mixed Use development under its Planned Development (P-D) districts. These districts were established for two purposes;

1. To provide a district for addressing specific site and building design issues for and needs created by large scale residential, commercial, office, institutional or industrial uses.
2. To allow for more flexible placement, mixture, arrangement and orientation of residential, office institutional, commercial and/or industrial uses.

Approved P-D districts do not come with the same restrictive unit limits that the M-R districts are. While the M-R districts are only allowed 14 units per acre the P-D district allow for developments that are over 250 units or over 300 acres.

All P-D developments must be applied for and all normal submission requirements, zoning and subdivision approvals and constructions standards as outlined in the code apply. The current City of Rome zoning map contains no P-D developments but this kind of district could be utilized as a way to provide affordable housing in the larger quantities that are needed.

### **Fair Housing**

There is not a specific discussion of fair housing within the zoning codes for the City of Rome, except where to mention that all public meetings by the Planning and Zoning Board along with the Governing Board are open to public comment and that they will not discriminate against any individual in compliance with the Fair Housing Act.

After review and examination of local land use and zoning regulations, it is apparent that some aspects of the City's ordinance, particularly with respect to personal care homes, impose restrictions that could constitute impediments to fair housing choice.

## Housing Profile

Affordability is a significant factor for Rome residents attempting to select housing that meets their family needs. HUD considers housing affordable if it costs less than 30% of a family's income. Households that spend over that threshold may be significantly cost burdened and have difficulty affording basic necessities.

Yet, according to HUD, 12 million renters and homeowners in the United States spend more than 50% of their income on housing and a family with one full-time worker earning the minimum wage cannot afford the local fair-market rent for a two-bedroom apartment anywhere in the United States. HUD's definition of "affordable housing" includes housing-related expenses such as rent and utilities.

On an annual basis, HUD calculates median family income for metropolitan statistical areas (MSAs) across the country, including the Rome MSA. The data is categorized based on its relationship to the median family income (MFI) in the area. The categories include: extremely low income (earning less than 30% of the MFI), very low-income (earning between 30% and 50% of the MFI), and low-income (earning between 50% and 80% of the MFI). According to HUD, the 2013 MFI for households in the City of Rome is \$50,300.

**Table 25: FY 2013 HUD Maximum Household Income Limits [Rome, GA]**

FY 2013 Income Limit	1 Person Household	2 Person Household	3 Person Household	4 Person Household	5 Person Household	6 Person Household	7 Person Household	8 Person Household
Very Low (50%) Income Limits	\$17,650	\$20,150	\$22,650	\$25,150	\$27,200	\$29,200	\$31,200	\$33,200
Extremely Low (30%) Income Limits	\$10,600	\$12,100	\$13,600	\$15,100	\$16,350	\$17,550	\$18,750	\$19,950
Low (80%) Income Limits	\$28,200	\$32,200	\$36,250	\$40,250	\$43,500	\$46,700	\$49,950	\$53,150

A community’s housing needs change over time as the size and composition of the population evolves and housing preferences shift. Different social and economic factors may influence whether families choose to rent or buy, construct new homes or renovate old homes. The size and type of homes are also influenced by family size, householder age, and economic status.

While housing choices can be fundamentally limited by household income and purchasing power, the lack of affordable housing can be a significant hardship for low-income households preventing them from meeting their other basic needs. The following section of this Analysis will present a housing profile for the City of Rome and will include various housing statistics related to single family and rental housing.

### **Housing Stock**

A total of 65% of Rome’s overall housing stock is a single unit, detached style. This is by far the largest component of the City’s housing stock with the 2 unit duplex-style homes coming in second at 9.3% the majority of Rome’s multi-family structures contain between five and nine units.

**Table 26: Number of Unit Structures**

<b>Units in Structure</b>	<b>Number</b>	<b>Percent</b>
<b>Total Housing Units</b>	16,043	100%
<b>1-unit, detached</b>	10,435	65.0%
<b>1-unit, attached</b>	430	2.7%
<b>2 units</b>	1,487	9.3%
<b>3 or 4 units</b>	696	4.3%
<b>5 to 9 units</b>	966	6.0%
<b>10 to 19 units</b>	747	4.7%
<b>20 or more units</b>	979	6.1%
<b>Mobile home</b>	303	1.9%
<b>Boat, RV, van, etc.</b>	0	0.0%

Since the 1980s both the City of Rome’s population and total amount of housing units have remained relatively flat. Rome has seen its population grow by less than 7,000 people since

1980 (from 29,915 to 36,303) and its housing stock has followed those same growth trends. In 1980 there were 11,787 total housing units in Rome; based on 2011 ACS estimates, that number has increased by less than 5,000 units to 16,043. The slow growth in population could partially be attributed to heavy job loss in the textile industry as discussed previously in this Analysis. However, even more significant than the relatively slow growth of Rome’s population and housing stock has been its increase in vacancy rates. The table below shows the climb in vacancy rate over the last twenty years.

**Table 27: Total Number of Household Units**

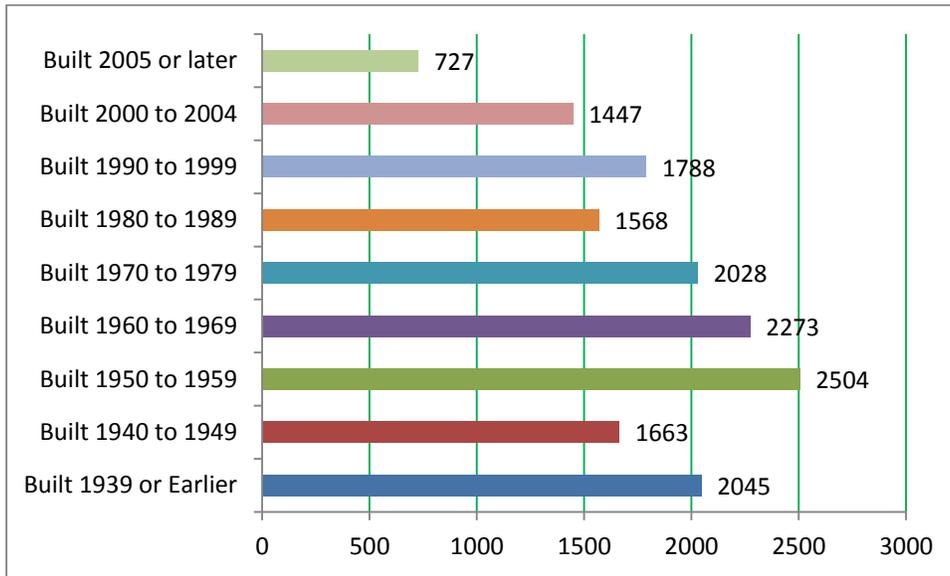
	1990	2000	2010
<b>Total Housing Units</b>	14,508	15,797	16,043
<b>Occupied Units</b>	13,320 (91.8%)	13,885 (87.9%)	13,424 (83.7%)
<b>Vacant Units</b>	1,188 (8.2%)	1,912 (12.1%)	2,619 (16.3%)

Over the last twenty years, Rome has seen its vacancy rate nearly double; between 2000 and 2010 the number of occupied units fell despite the overall total number of housing units going up.

### **Housing Conditions**

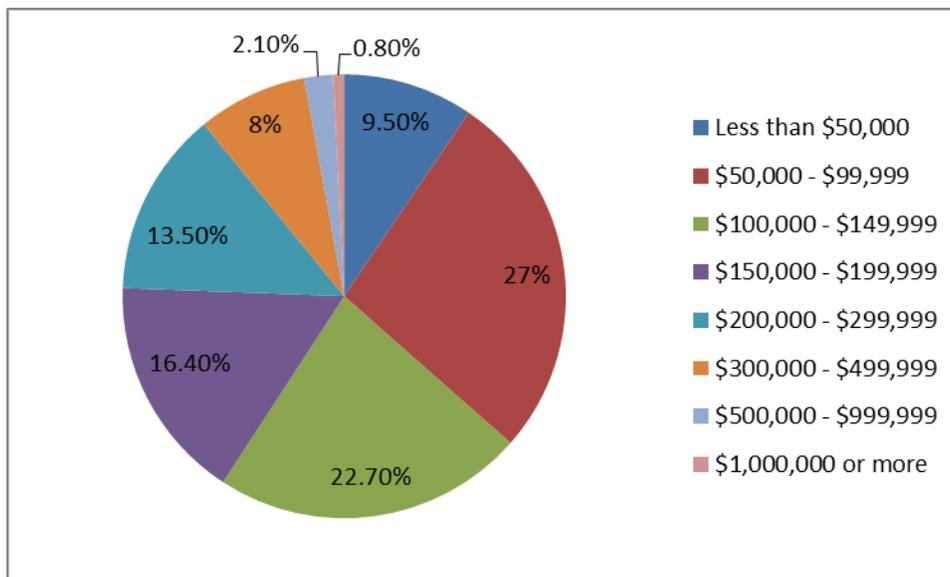
Over 65% of Rome’s current housing stock was built prior to 1980, and over 35% was built prior to 1960. The new construction market has followed the city’s population trends with less than a quarter (24.6%) of Rome’s current housing stock being built since 1990 and less than 5% (4.5%) constructed since 2005. As houses age their annual maintenance costs rise which adds additional cost burden on potential low and moderate-income homeowners. Another factor correlated to the age of the housing stock is accessibility. Older construction is far less likely to have been built to standards that make the dwelling accessible to people with disabilities.

**Table 28: City of Rome- Homes Built By Year**



Cost burden becomes even greater when assessing the change in home values in Rome from 2000 to the 2011 ACS estimates. While Rome’s housing stock became progressively older and more costly to maintain, it has also seen its value increase by over \$40,000 on average. Even in the midst of a severe downturn in the housing market and nationwide economic recession, the median price of homes in 2000 (\$87,100) grew by over 46% in the last decade to an estimate of \$127,300 in 2010.

**Table 29: Value of Homes in Rome by Percentage**



This increase in property values, while a positive sign for the economy and the housing market in general, has led to more trouble building and developing affordable housing and that has led those that are in need of affordable housing to settle on substandard housing that is aging and not well maintained.

**Table 30: Home Values in Rome, 2000-2011**

Comparing 2000 v. 2011 Home Values in Rome, Ga				
	2000 Census Data		2011 ACS Estimate	
Specific Owner Occupied Units	6,657		7,172	
Less than \$50,000	1,317	19.8 %	678	9.5%
\$50,000 - \$99,999	2,760	41.5 %	1,939	27.0 %
\$100,000 - \$149,999	1,404	21.1 %	1,625	22.7 %
\$150,000 - \$199,999	542	8.1%	1,179	16.4 %
\$200,000 - \$299,999	430	6.5%	967	13.5 %
\$300,000 - \$499,999	127	1.9%	575	8.0%
\$500,000 - \$999,999	71	1.1%	153	2.1%
\$1,000,000 or more	6	0.1%	56	0.8%
Median Value	\$87,000		\$127,300	

According to HUD, in order for a homeowner to be in a situation that is considered stable, where the bills are being paid on time, and money is still being put into savings, a mortgage should not represent more than 30% of their monthly income. In the table below, 2011 ACS Estimates are used to detail the current mortgage situation in Rome.

**Table 31: Monthly Mortgage Costs**

Monthly Mortgage Costs as a Percentage of Household Income -2011 Estimates	Number of Homes	Percentage of Homes
Less than 20.0 percent	1,550	33.7%
20.0 to 24.9 percent	696	15.2%
25.0 to 29.9 percent	571	12.4%
30.0 to 34.9 percent	450	9.8%
35.0 percent or more	1,327	28.9%

Currently more than half of Rome’s homeowners (61.3%) are under HUD’s ideal 30% threshold. The disproportionate share of Rome residents who have mortgage payments that exceed 35% of monthly income could be a result of the fast rising property values in Rome and could also be contributing to the growing vacancy rate in Rome. In 2000 only 954 households (15.4%) paid 35% or more of their monthly income on mortgage payments. In the rental market 47.7% renters currently pay rent that exceeds 35% of their monthly income.

In interviews and public meetings conducted as part of this analysis, a frequent concern voiced by Rome residents was the substandard condition of the City’s housing stock. According to the 2000 census a total of 81 homes in Rome lacked complete plumbing facilities which represented 0.6% of overall housing stock. Since then, that number had grown to 133 (2011 ACS Estimate) which represents 1.0% of the overall housing stock. The same growth in substandard conditions is even more apparent when considering incomplete kitchen facilities. In 2000 there were 172 homes that lacked complete kitchen facilities based on 2011 estimates that number has nearly tripled to 433.

**Examining the Rental Market**

As alluded to previously, renters in Rome spend a large and unbalanced amount of their monthly income on rent as detailed in the chart below.

**Table 32: Rental Properties**

Monthly Rental Costs as a Percentage of Household Income -2011 Estimates	Number of Homes	Percentage of Homes
Less than 15.0 percent	617	10.8%
15.0 to 19.9 percent	701	12.3%
20.0 to 24.9 percent	725	12.7%
25.0 to 29.9 percent	419	7.3%
30.0 to 34.9 percent	524	9.2%
35.0 percent or more	2,724	47.7%

Nearly 65% of Rome’s renters spent 25% or more of their monthly income on rent based on the 2011 ACS Estimates. When compared to statewide data, a total of 43.1% of renters across the state spend more than 35% of their monthly income on rent. However the median rental cost statewide was \$835 while in Rome it was \$674 which represents a \$231 increase from the 2000 figure of \$443 per month. Rome had a median rent cost that was 80.7% of the median rent in Georgia despite the fact that Rome’s residents earn an annual median income that is 67.7% of the median State income is (State of Georgia Median Annual Income- \$49,736, City of Rome Median Annual Income-\$33,719). The jump in rental rates followed the same trend that property values have and has caused an even greater

number of renters to pay more in rent annually. It also further limits the options of lower-income renters who need affordable housing and forces them to consider substandard housing.

The National Low Income Housing Coalition (NLIHC) is an organization dedicated to achieving socially just public policy that assures people with the lowest incomes in the United States have affordable and decent homes. For the last 20 years NLIHC has produced an annual report called “Out of Reach” which is a report on the “Housing Wage”. The Housing Wage is a wage that one must earn in order to afford modest rental homes in communities across the country. One of the metropolitan statistical areas that they research is Rome.

The median income in Rome is \$33,719 which equates to an hourly wage of \$16.21 per hour. The following table details NLIHC’s 2013 housing wage in Rome for rental homes between one and four bedrooms.

**Table 33: Rental Home Size Compared to Housing Wages**

Rental Home Size	Housing Wage (hourly)
1 Bedroom	\$11.15
2 Bedrooms	\$15.10
3 Bedrooms	\$18.81
4 Bedrooms	\$26.71

Rome’s 2013 Housing Wage is above what the current median wage is for both its three bedroom and four bedroom options. On a larger scale, the table below details the amount of annual income needed to afford the median monthly rent for the rental options in Rome.

**Table 34: Median Monthly Rent Compared to Income Requirement**

Rental Home Size	Median Monthly Rent	Median Annual Income Needed
1 Bedroom	\$580	\$23,200
2 Bedroom	\$785	\$31,400
3 Bedroom	\$978	\$39,200
4 Bedroom	\$1,389	\$55,560

The minimum wage in Georgia is \$7.25 per hour and given the current median monthly rent figures it would take a worker earning minimum wage 62 hours of work just to earn enough to pay rent in a single bedroom rental home. For a family that needed a four bedroom apartment it would take a total of 147 hours worked at minimum wage before the rent on that apartment could be earned.

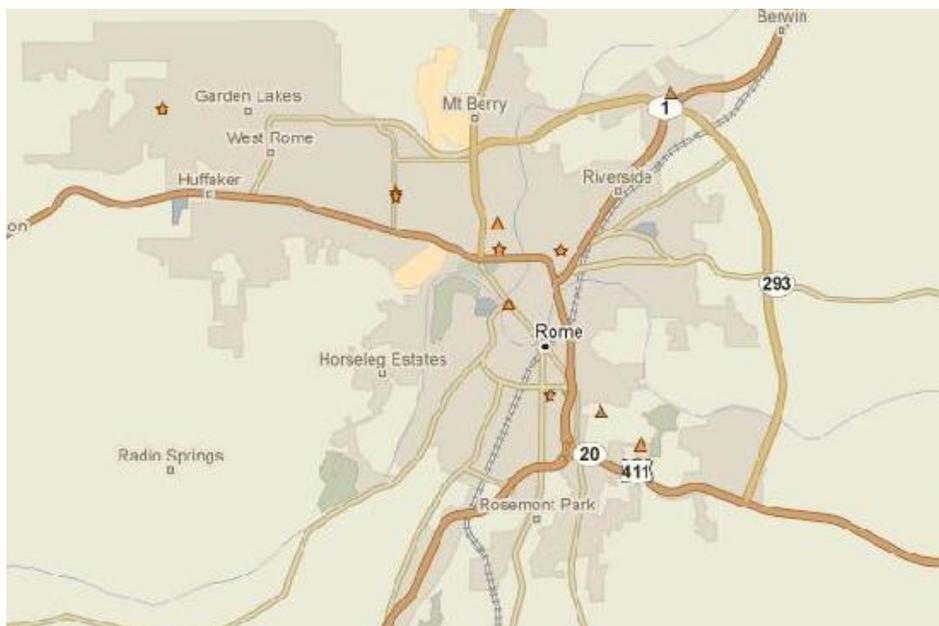
**Table 35: Minimum Wage Requirements**

Rental Home Size	Minimum Wage Hours Required	F/T Jobs Needed at Minimum Wage Rate
1 Bedroom	62	1.5
2 Bedroom	83	2.1
3 Bedroom	104	2.6
4 Bedroom	147	3.7

From 2007 to 2011 an average of 33% of Rome’s population was classified as renters. In 2013 the mean wage amongst the renting population was \$10.90 per hour. The rent affordable at that rate is \$567 per month which is below even the one bedroom housing rate for Rome.

The results of the 2013 NLIHC “*Out of Reach*” study clearly support the cost burden data from the 2011 ACS showing that 47% of Rome’s rental population commits over 35% of their monthly income to paying rent.

**Figure 11: Public Housing and Low-Income Housing Tax Credit Projects**



Source: Policy Maps; Map Legend: Stars-Public Housing Projects, Triangles-Low-Income Tax Housing Credit Projects

The subsidized Housing Choice Voucher rental assistance program enables a jurisdiction to provide affordable housing options for very low-income households. A family that is issued a housing voucher is responsible for finding a suitable housing unit of the family's choice where the property owner agrees to participate in the program. Rental units are required to meet HUD minimum housing standards, as determined by the public housing agency

(PHA). In many cases, the housing subsidy is paid directly to the landlord by the PHA on behalf of the participating tenant household. The tenant will then pay the difference between the actual rent charged by the landlord and the amount subsidized by the program each month. Under certain circumstances, if authorized by the PHA, a family may use its voucher to purchase a modest home. Since the demand for housing assistance often exceeds the limited resources of local housing authorities, long waiting lists are common.

The Northwest Georgia Housing Authority serves the City of Rome and administers the Housing Choice Voucher rental assistance for those residents that qualify. Due to the high demand for these vouchers, the program is currently closed to new applicants with a long waiting list that deters many from considering this voucher as an option for their housing needs.

Northwest Georgia Housing Authority also operates a total of nine public housing developments that are spread across Rome and expand the local affordable housing options.

**Table 36: NGHA Public Housing Projects**

Northwest Georgia Housing Authority Public Housing Projects <sup>22</sup>	
Project Name	Number of Units
Charles Hight Homes The Highrise	303 Units
Charles Hight Homes at Ave B	8 Units
John Graham Homes	150 Units
Pennington Place	2 Units
Park Homes	164 Units
Willingham Village	200 Units
Willingham at Division	27 Units
Village Green	10 Units

In addition to the eight public housing authority properties listed above, there are also an additional six Low-Income Housing Tax Credit (LIHTC) apartment complexes in Rome.

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<sup>22</sup> Source: Northwest Georgia Housing Authority

**Table 37: LIHTC Apartment Complexes**

LIHTC Apartment Complexes	
Callier Forest Apartments	130 Units
Windridge Apartments	84 Units
Greystone Apartments	71 Units
Riverwood Park	90 Units
Ashland Park	183 Units
Etowah Terrace	77 Units

LIHTC properties are developments that have been given incentives through tax credits to develop and maintain affordable housing aimed at low-income residents. In order to qualify for this tax credit, each development must set-aside at least 20% of its residential units as rent restricted and occupied by individuals who make 50% or less of the area median gross income, and that at least 40% of its residential units are rent restricted and occupied by individuals who make 60% or less of the area median gross income.

HUD's 2012 Picture of Subsidized Households shows that in total there were 1,639 subsidized units available in Rome. These units were at 89% occupancy with an average rent of \$222 per month. The average household income for these units was \$9,559 per year with over 73% of the households receiving the majority of their income through sources other than wages or welfare. As of the 2012 report, the average waiting list time was 14 months.

Rome's Affordable Housing stock seems to be split between those units that are subsidized through the Housing Choice Voucher or the Low-Income Housing Tax Credit and those that are not subsidized but are in a substandard state. With regard to the availability of affordable housing in Rome, there are two primary issues. The first is with the price increases that are occurring in both the homeownership and rental markets. The second issue is that the current condition of the available housing stock is aged and new construction projects are slowing which is creating an increasing presence of substandard housing.

## Home Mortgage Disclosure Act (HMDA) Analysis

The Home Mortgage Disclosure Act (HMDA) was passed by Congress in 1975 and amended in 1989. The law mandates that financial institutions such as banks, savings and loan associations, mortgage companies, and credit unions, report information concerning their home lending activity. As required by the statutes and regulations, these lenders must disclose the number of loan applications by census tract, and by the income, race, and gender of the applicant and co-applicant. Financial institutions must make decisions as if they had no information about the applicant's race, regardless of whether race is a good proxy variable for risk factors that a lender cannot distinguish or observe.

Each year, lenders must report the number of loan applications approved and denied. Lenders must also indicate how many of their loan approvals were not accepted – the institution approved, but the applicant refused. The lenders must also specify how many applications were withdrawn (the applicant withdrew his application before the bank made a credit decision), and how many applications were incomplete (the applicant did not provide all necessary information).

Of all the loan applications filed with banks in the City of Rome during 2011 (the most recently reported data available), White clients accounted for the greatest number. This data reflects the overall demographics of the City, where 57.3% of the residents are White. The Black or African American applicants were noted for the greatest number of denials for credit history at 46%; however, the White and Joint (White/Minority Race) were close behind in the 30% range. American Indian/Alaska Natives and Native Hawaiian/ Pacific Islanders were denied 100% for collateral.

**Table 38: Reasons for Denial by Race (by percentage) City of Rome**

Reasons for Denial of Application by Race	Debt-to-income ratio	Employment History	Credit History	Collateral	Insufficient Funds	Unverifiable Information	Credit App. Incomplete	Mortgage Insurance Denied	Other	Total Applications
American Indian/Alaska Native	0%	0%	0%	100%	0%	0%	0%	0%	0%	2
Asian	20%	0%	0%	30%	0%	20%	30%	0%	0%	10
Black or African American	18%	2%	46%	14%	6%	4%	0%	0%	10%	50
Native Hawaiian/Other Pacific Island	0%	0%	0%	100%	0%	0%	0%	0%	0%	1
White	20.6%	0.5%	32.6%	27.6%	2.9%	2.9%	10.4%	0%	8%	344
Two or more minority races	0%	0%	0%	0%	0%	0%	0%	0%	0%	0
Joint (White/Minority Race)	0%	0%	33.3%	66.6%	0%	0%	0%	0%	0%	3
Race Not Specified	12%	0%	14%	11%	2%	0%	4%	0%	7%	48

In a study of denials by loan purpose, home improvement loans have the highest denial rate in relation to credit history; however, all loan types report the high denial rates on account of credit history. Refinancing loans showed the highest denial rate for collateral at 33.8%.

**Table 39: Reasons for Denial by Loan Purpose (by percentage) City of Rome**

Reasons for Denial of Application by Loan Purpose	Debt-to-income ratio	Employment History	Credit History	Collateral	Insufficient Cash	Unverifiable Information	Credit App. Incomplete	Mortgage Insurance Denied	Other
Home Mortgage	22.4%	5.1%	34.4%	13.7%	6.8%	8.6%	0%	0%	6.8%
Refinance	18.3%	0%	16.1%	33.8%	2.8%	2.8%	14.7%	0%	11.2%
Home Improvements	21%	0%	65.7%	7.8%	1.3%	0%	0%	0%	3.9%

The following table presents the 2011 HMDA data for each census tract in the City of Rome. Instances of high denial rates, high minority percentages, and low median incomes are highlighted in red. High and low values were classified according to their deviation from the mean, with a central class defined as +/- 1.0 standard deviation and the high and low values defined as values lying outside 1.0 standard deviation from the mean. Though HMDA and not Census data was used to designate the high minority tracts in the following table, the tracts identified by HMDA closely mirror the tracts identified using the Census data. The average denial rate for all tracts was 20.46% in 2011. In addition, the average census tract had a minority population of 30.8% and a median income of 90.9% of the median for the City of Rome.

**Table 40: HMDA Mortgage Origination & Denial Rates**

Mortgage Origination & Denial Rates by Census Tract - 2011									
Census Tract Number	Total Applications	Loans Originated	Apps Approved, Not Accepted	Apps Denied	Apps Withdrawn	Files Closed For Incompleteness	Denial Rate	% Minority Population	Median Income as a % of MSA Median
3.00	46	34	0	7	5	0	15.20%	11	119
4.00	234	127	10	64	23	10	27.35%	17	114
5.00	85	55	2	18	8	2	21.17%	43	72
6.00	86	52	4	22	6	2	25.58%	57	67
7.00	175	102	5	42	20	6	24.00%	5	113
8.00	202	137	5	28	24	8	13.86%	21	107
9.00	83	55	3	14	7	4	16.86%	13	128
11.00	53	34	5	9	5	0	16.98%	41	63
12.00	129	72	4	37	12	4	28.68%	36	90
13.00	159	99	11	28	15	6	17.61%	18	96
15.00	35	21	2	5	6	1	14.28%	72	64
16.00	46	26	2	12	3	3	26.08%	59	61
18.00	147	95	8	27	14	3	18.36%	7	85
<b>TOTAL</b>	<b>1,480</b>	<b>909</b>	<b>61</b>	<b>313</b>	<b>148</b>	<b>49</b>	<b>20.46%</b>	<b>30.8</b>	<b>90.7</b>

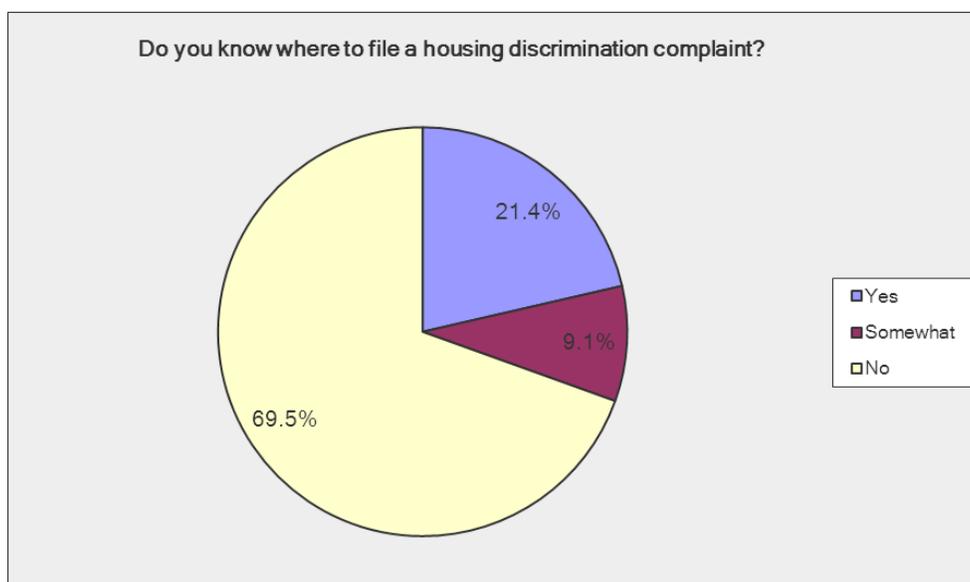
Based on the 2011 HMDA analysis, the data suggests potential discrimination against minorities in the local mortgage market. In particular, three tracts (4.00 in North Rome, 12.00 in South Rome, and 16.00 in East Rome) show denial rates significantly higher than average. Of the three tracts only one portrays higher than average minority population percentages (16.00). However, tract 16.00 did not exceed the average median income. The denials could be caused by the applicants' income rather than their race. Tract 12.00 had the highest denial percentage at 28.68%, with a minority population and median income near average. This tract could use additional research to determine the exact factors used to determine denial of each application to eliminate suspicions of discrimination.

## Fair Housing Organizations & Activities

Having educational resources available to local residents when it comes to fair housing is critical to reducing fair housing violations and impediments. These resources and services are normally provided to the community by local non-profits and private institutions that have been certified by HUD as housing counseling agencies. When low-income and minority residents have access to these resources, such as financial and budget management training, credit counseling and assistance opportunities, they are made more aware of their rights in fair housing and are better educated when looking for a home.

The baseline measurement regarding public awareness of fair housing issues comes from a national survey conducted in 2000 by HUD.<sup>23</sup> This survey revealed that “majorities of the adult public were knowledgeable about and approved of most aspects of the law, although the size of the majorities varies across these aspects.” In addition, only a very small percentage of survey respondents who asserted their fair housing rights had been violated took action. In 2005, a follow up survey was conducted by HUD to measure the national increase in public awareness of fair housing rights and the survey revealed very little change in public awareness overall, however public support for fair housing had dramatically increased.

**Table 41: Filing a Fair Housing Complaint**



23 Martin D. Abravanel and Mary K. Cunningham, *Do We Know More Now? Trends in Public Knowledge, Support and Use of Fair Housing Law*. U.S. Department of Housing and Urban Development. (February 2006). Source: <http://www.fhco.org/pdfs/DoWeKnowMoreNowSurvey2006.pdf>

The Analysis of Impediments to Fair Housing conducted for Rome in 2009 suggested that the city needed to “identify an institution as the focal point for Fair Housing Support”<sup>24</sup>. The analysis went further to say that there was not a designated organization that is responsible for the provision of specific fair housing education and services, including a central point for residents to bring fair housing inquiries or complaints to. The table above conducted as a part of this AI reflects that nearly 70% of survey respondents did not know where to file a complaint. This may be one reason that a relatively small number of residents have come forward with reported violations in the past. Subsequent to the finding for the 2009 AI, Rome designated the Appalachian Housing Counseling Agency (AHCA), a part of the Appalachian Housing and Redevelopment Corporation (AHRC) as its center for promoting fair housing in Rome. Public awareness of fair housing issues and laws is critical to reducing fair housing violations and is a means to ending housing discrimination.

As the organization named to carry out fair housing promotion and education, the AHCA is also heavily invested in providing homebuyer education and counseling programs to AHRC clients. The AHRC offers HUD approved housing counseling courses through the AHCA in the form of:

- Pre-Purchase/Credit Counseling
- Post Purchase Counseling
- Homebuyer Education Seminars
- Mortgage Default & Resolution Counseling
- Budget/Money Management

The AHRC also offers other financial assistance services to low- or moderate-income residents of Rome, such as rental and homeless assistance, down payment assistance, minor home repair, and senior housing rehabilitation programs to help residents with financing or repairs to their homes. In their efforts to further fair housing, the AHCA publicly distributes a flyer titled “the Georgia Fair Housing Act”, produced by the Georgia Commission of Equal Opportunity and the Georgia Department of Community Affairs. Other services, such as fair housing education classes are not publicly promoted or advertised by the agency. The educational flyer appears to be the extent of furthering fair housing among Rome residents.

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24 Larry Keating and Melissa Mailloux. (January 2009). *Analysis of Impediments to Fair Housing: City of Rome, Georgia*. Marketek Inc.

The Northwest Georgia Housing Authority is the public housing authority (PHA) for several jurisdictions in the Northwest Georgia area. This entity is similar to the AHRC in overseeing multiple housing programs as well as providing residents with education and resources for available housing and financial assistance programs. As Rome is the largest of the cities that this entity works with in population size, much of NGHHA's funding and resources are directed to serving Rome residents.

Though it is not a public or non-profit organization, Credability is a private entity that has multiple branches throughout the state of Georgia and offers services in credit counseling, homebuyer education, money management and many other areas that pertain to housing. A local branch in Rome makes these resources readily accessible to local residents.

## Housing Discrimination Complaints

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HUD's Office of Fair Housing and Equal Opportunity (FHEO) administers federal laws and establishes national policies that ensure all Americans have equal access to the housing of their choice. Individuals who believe they are victims of housing discrimination can choose to file a fair housing complaint through their regional FHEO. Typically, when a complaint is filed with the agency, a case is opened and an investigation of the allegations of housing discrimination is conducted. If the complaint is not successfully mediated, the FHEO determines whether reasonable cause exists to believe that a discriminatory housing practice has occurred. Where reasonable cause is found, the parties to the complaint are notified by HUD's issuance of a "Determination", as well as a "Charge of Discrimination", and a hearing is scheduled before a HUD administrative law judge. Either party (complainant or respondent) may cause the HUD-scheduled administrative proceeding to be terminated by electing instead to have the matter litigated in federal court.

The study, *"How Much Do We Know"*, published by HUD in 2002, reports that only half of the public could correctly identify as unlawful six out of eight scenarios describing illegal fair housing conduct. Nearly one-fourth of the public knew the law in two or fewer of the eight cases. In addition, 14% of the adult population claimed to have previously experienced some form of housing discrimination. Of those who thought they had been discriminated against, 83% indicated they had done nothing about it, while 17% say they pursued a complaint. HUD's follow-up study, *"Do We Know More Now? Trends in Public Knowledge, Support and Use of Fair Housing Law"* (published in 2006), reported that "41% of the former survey respondents said it was "very likely" they would do something about future discrimination compared to only 20% in the 2002 survey." The survey revealed that 46% of those who reported having experienced discrimination in the past and done nothing about it said they would very likely do something about future discrimination.

Individuals with more knowledge are more likely to pursue a complaint than those with less knowledge of fair housing laws. Therefore, there is an association between knowledge of the law, the discernment of discrimination, and attempts to pursue justice. Locally, it is critical that there are efforts in place to educate, to provide information, and to provide referral assistance regarding fair housing issues in order to better equip persons with the ability to assist in reducing impediments.

According to the National Fair Housing Alliance (NFHA), 2012 Fair Housing Trends report, more disability complaints have been filed nationwide than any other type of fair housing complaint. NFHA suggests that this may be attributed to property owners' direct refusal to make reasonable accommodations or modifications for people with disabilities. As a result, HUD has implemented the Fair Housing Accessibility FIRST program to assist in educating architects and builders regarding design and construction of accessible housing units.

In conducting the following fair housing complaint analysis, several data limitations should be noted:

- Because each organization's complaint process relies on self-reporting by the complainant, the data represents only complaints that actually are filed and is not inclusive of the total number of inquiries received by an organization and does not represent all acts of housing discrimination, as all incidents are not reported;
- Larger, denser areas are likelier to have a higher number of complaints due to larger populations;
- The fair housing complaints recorded here all allege acts of discrimination regarding housing located within the City of Rome and may therefore include complaints filed by or against residents of surrounding jurisdictions;
- The numbers of types of complaints filed with each organization may exceed the total number of filings due to multiple discrimination allegations within a single complaint.

### **Complaints Filed with HUD**

Region IV of the FHEO receives complaints by households regarding alleged violations of the Fair Housing Act for the city of Rome and for all of Floyd County. The mission of the FHEO is to protect individuals from employment, housing and public accommodation discrimination, and hate violence. To achieve this, the FHEO maintains databases of and investigates complaints in each of these areas. The accompanying table identifies the number of complaints filed by the status of the complaint, and the bases of the complaint.

From January 1, 2003 through December 31, 2012 there were three housing complaints filed with regard to housing in the city of Rome. Two of the complaints alleged discrimination on the basis of race or color; one alleged discrimination on the basis of disability status. Of the three total complaints, one was found to have no cause, another was found to lack jurisdiction, and the other complainant failed to cooperate with HUD. As of December 31, 2012 all three of the complaints brought to HUD had been closed. Full information on the complaints, as provided by FHEO, can be found in the Appendix.

### **Complaints Filed Georgia Commission on Equal Opportunity**

The Georgia Commission on Equal Opportunity (GCEO) was established in 1978 when the State of Georgia passed the Fair Employment Practices Act of 1978. The GCEO is under the auspices of the Office of the Governor and is administered by a gubernatorial appointee. The GCEO has two divisions which include the Equal Employment Division and the Fair Housing division. The goal of the GCEO is to eliminate discrimination throughout the State of Georgia.

From January 1, 2003 through December 31, 2012 a total of eight complaints were filed with the GCEO. Of those complaints, three were found to have cause. Two of those three complaints were withdrawn after resolution and the other complaint eventually settled. All eight of the complaints filed with the GCEO were on the basis of race, while 6 of the 8 referenced a secondary basis citing a range of discrimination that included disability, familial status, sex, and religion.

### **Complaints Filed With the Appalachian Housing Counseling Agency**

The Appalachian Housing Counseling Agency (AHCA) is a part of the Northwest Georgia Housing Authority and is intended to serve as a local agency capable of receiving and investigating housing discrimination complaints. The AHCA also educates buyers on homeownership preparedness along with finding potential buyers from the affordable housing projects that the Northwest Georgia Housing Authority controls. The AHCA reports that it has not received a fair housing complaint since 2011.

**Table 42: Housing Discrimination Complaints**

<b>Complaints of Housing Discrimination Received in the City of Rome</b>	
<b>Violation</b>	<b># of Complaints</b>
# Files	11
# Closed	11
# Open	0
With Cause	3
Settlement	2
Disability	1
Color/Race	10
Familial Status	0
Marital Status	0
Sex	0
National Origin	0
Age	0
Citizenship	0
Religion	0
Retaliation	0
Harassment	0
Other/Criminal Status	0

An examination of fair housing complaints can be used to indicate a community's most common bases for discrimination allegations. However, it is important to note that reviewing the number of fair housing complaints filed within a given community cannot by itself be used as a direct indicator of fair housing problems in that community. Among the agencies accepting fair housing complaints for the City of Rome, the largest numbers of complaints filed were alleged claims of discrimination based on race/color.

The relatively low number of complaints filed regarding housing in Rome is not necessarily indicative of a low incidence of housing discrimination in the community. Many households do not file complaints because they are not educated about the process for doing so. Other households may be aware that they are experiencing housing discrimination, but they are simply not aware that this discrimination is against the law. Finally, many households are more concerned with their primary goal of finding decent affordable housing and choose not to take the time to file a complaint and wait for a resolution.

## Housing Discrimination Lawsuits

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Based upon a thorough search of published state and federal court filings and opinions and HUD ALJ (Administrative Law Judge) decisions and consent decrees, there has been one significant lawsuit filed to redress housing discrimination or Fair Housing Act related violations concerning property or violations within the City of Rome over the past eight years.

In Chastain v. Northwest Georgia Housing Authority, Civil Action File No. 4:11-cv-00088-HLM (N.D. Ga. filed April 5, 2011), Plaintiff, a public housing tenant in Rome, brought claims under the U.S. Housing Act of 1937, 42 U.S.C § 1437 *et seq.*, against the Housing Authority. Following a series of illnesses, surgeries, and hospitalizations and while Plaintiff was without an income and awaiting a decision on her application for federal SSI benefits, Defendant denied her request for a hardship exemption from the minimum rent requirement and failed to follow the correct procedures for a grievance hearing. On April 28, 2011, the district court granted Plaintiff a preliminary injunction pending final adjudication of her request for permanent injunctive relief because it found the Housing Authority had not properly followed the rules and regulations regarding the initial grievance procedure and because Plaintiff had a substantial likelihood of succeeding on the merits of her claim seeking a long-term minimum rent hardship exemption. The Housing Authority argued that if its other 1,000 tenants learned of Plaintiff's success, they could be motivated to file for government benefits so that they too could obtain relief from the minimum rent requirement. The Court disagreed with the Housing Authority's argument that the potential for a deluge of other requests for relief should weigh against the merits of Plaintiff's application. The case was voluntarily dismissed by Plaintiff on September 12, 2011, prior to final adjudication of her claims. The parties did not file a settlement agreement or consent order as part of the record.

Also of note, in Floyd County v. Federal Housing Finance Agency, Civil Action File No. 1:13-cv-00056-TWT (N.D. Ga. filed July 19, 2012), Floyd County filed a class action lawsuit against Freddie Mac and Fannie Mae alleging defendants failed to pay the statutorily required Georgia Transfer Tax, in accordance with O.C.G.A. § 48-6-1 *et seq.*, for transfers of title or beneficial interest in real estate within the County and throughout the state. Other counties in Georgia have filed similar suits, and the action could potentially involve all 159 counties in Georgia.

## Hate Crime Data

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Any traditional crime, such as murder, arson, or vandalism can be classified as a hate crime if it is motivated by a bias against a race, religion, disability, ethnic origin or sexual orientation. Because these protected classes significantly overlap those classes protected under the Fair Housing Act, an examination of data on hate crimes is conducted as part of this Analysis of Impediments. The Federal Bureau of Investigation (FBI) maintains a Uniform Crime Reporting Program, under which more than 18,000 federal, state, and local law enforcement agencies voluntarily report incidences of crime in their jurisdictions for nationwide statistical assessment and monitoring purposes. Hate crime statistics have been monitored and published annually under the FBI's Uniform Crime Reporting Program since 1992.<sup>25</sup>

For this analysis, hate crime statistics for the most recently available five-year period (2007-2011) were reviewed for any trends that could indicate pervasive discriminatory attitudes within the City of Rome. However, no hate crimes were reported by the Rome Police Department or any other local policing agencies over the five-year period studied.

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<sup>25</sup> FBI.gov. <http://www.fbi.gov/about-us/cjis/ucr/hate-crime/2011/resources/about-hate-crime-statistics>

## Impediments & Recommendations

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In the *Fair Housing Planning Guide*, HUD defines an impediment to fair housing choice as an action, omission or decision based on race, color, religion, sex, disability, familial status, or national origin that restricts or has the effect of restricting housing choices or the availability of housing choices.<sup>26</sup> Throughout this analysis various community issues have surfaced, both positive and negative. Some of these issues represent general community needs (e.g. the quality of jobs available) and, while valid, do not restrict or have the effect of restricting housing choice and thus do not constitute impediments. Even some affordable housing-related issues (e.g. low credit scores leading to denial of apartment rental applications) fall short of classification as impediments to fair housing choice.

For this analysis, qualitative data received in the form of input from interviews and community meetings was combined with quantitative data from the fair housing survey and from the many other sources consulted, including the U.S. Census, the American Community Survey, and Home Mortgage Disclosure Act data. In some cases, the quantitative data collected from a single source was clear and compelling enough on its own to indicate the existence of an impediment. In other cases, and particularly with the use of qualitative data, the cumulative effect of a comment or criticism repeated many times over in many different settings was sufficient to indicate an impediment. Sometimes a weak or inconclusive correlation of quantitative data from one source could be supported by public comments and input or data from another source to constitute an impediment.

In this section, the impediments identified are summarized with supporting examples noted. Each impediment listed is followed by recommendations, the implementation of which will correct, or begin the process of correcting, the related impediment. It should be noted that these impediments are largely systemic and will require effort from both private sector and public sector actors to correct.

### Impediment #1: Limited Supply of Decent, Accessible, and Affordable Housing

As of the 2010 Census, 16.3% of Rome's 16,043 housing units were vacant. However, despite the city's relatively high proportion of vacant units, residents providing input into this Analysis reported a scarcity of decent and affordable housing units in the city. More than half of the city's current housing stock was constructed prior to 1970 and older housing, which typically carries greater maintenance costs, is more likely to fall into substandard condition. While making up a small percentage of the housing stock overall, Census data reflects dramatic increases in substandard units since 2000: a 64% increase in units lacking complete plumbing facilities and a 152% increase in units lacking complete kitchen facilities. Stakeholders interviewed in the course of this analysis frequently related

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<sup>26</sup> U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity. *Fair Housing Planning Guide: Volume 1 (Chapter 2: Preparing for Fair Housing Planning, Page 2-17)*. March 1996.

anecdotes of slumlords renting houses without heat, air conditioning, kitchen appliances or even water service. Another factor correlated to the age of the housing stock is accessibility. Older construction is far less likely to have been built to standards that make the dwelling accessible to people with disabilities, a fact noted by stakeholders consulted in the course of this analysis.

While substandard condition keeps some units from the city's stock of decent affordable housing, cost precludes others from being affordable to lower-income households. The National Low Income Housing Coalition's data finds that a minimum wage worker would need to work 83 hours per week to afford a two-bedroom apartment in Rome. Further, 28.9% of the city's homeowners and 47.7% of the city's renters spent more than 35% of their incomes on housing expenses, a threshold HUD considers to be a severe burden. As cost tends to restrict housing choice, particularly for those with lower incomes, this cost burden impacts a household's ability to obtain affordable housing. Renters with incomes below 30% AMI (which includes those receiving SSI as their sole source of income) are especially impacted, as are large families who seek units with four or more bedrooms, as these units are generally more expensive. Additionally, stakeholder interviews conducted in conjunction with this Analysis indicate large numbers of residents living week-to-week in area hotels, either unable to accumulate the funds necessary for apartment deposits or unable to locate decent apartments in convenient areas.

**Recommendation:** Rome must actively work to address the need for more decent, accessible, and affordable housing by continuing to prioritize investment of CDBG funds in its housing rehabilitation program. Additionally, the City should continue to apply for CHIP funds from the Georgia Department of Community Affairs to apply toward programs that rehabilitate and preserve units of affordable housing. The City should consider designating some funds for rehabilitation of rental properties rather than invest them entirely in owner-occupied housing. Finally, it is recommended that the City consider opportunities to support Low Income Housing Tax Credit (LIHTC) projects proposed by developers in the area, either through letters of endorsement or the investment of CDBG funds, to the extent a nominal investment of CDBG funds may make a project application more competitive.

### **Impediment #2: Uneven Distribution of Community Resources**

South Rome has been the focus of public investment, particularly of CDBG funds, for several years. Though the City is shifting its strategy to focus on other areas, the uneven investment pattern was noted as a concern by many residents. Beyond CDBG investments, some residents pointed out that certain municipal services, such as policing and tree removal, were delivered more quickly and reliably in the more affluent areas. Respondents to the Fair Housing Survey were asked to rate how equitably distributed various public resources were. In the survey results, public transportation, parks, and code enforcement were among the public services thought

to be most inequitably distributed, however, some respondents lived outside Rome city limits and, thus, beyond the possible reach of municipal services.

Housing choice necessarily involves trade-offs, as not every neighborhood can be equally served by every available resource. But, to the extent that distribution of community resources can become more homogenous, the range of housing choices available to certain protected classes will be expanded.

**Recommendation:** The City's Community Development staff should routinely review studies and plans (such as the Rome-Floyd Comprehensive Plan and transportation planning documents) for opportunities to advocate public infrastructure improvements that align with the goal of expanding housing choice. Additionally, the City and other entities such as the Northwest Georgia Housing Authority should jointly develop and implement an evaluation tool to be used when evaluating new housing construction projects that considers factors such as the proximity to public transportation, access to schools, and public parks. Use of the evaluation tool should ensure that publicly-funded developments create new housing opportunities in locations with optimum access to community resources.

### **Impediment #3: Restrictive Zoning Provisions**

Rome's zoning code defines a personal care home as "a place of residence for adults where lodging, meals, and personal care are provided 24 hours per day, seven days per week and where federal and/or state licensing or permitting is required". When the Northwest Georgia Regional Hospital in Rome closed, it created a large need for this type of development and care in the community. Despite a growing need, personal care homes located in residential districts are subject to special limitations or, in the case of homes serving five or more persons, to requirements for special use permitting. The code's classification of personal care home requirements by number of residents, when the code's "family" definition is not qualified similarly is problematic. For example, a single-family home for a family of five can be built without restriction or limitation in a S-R district, however, a home that is non-institutional in character where five people with disabilities reside and receive personal care would require special permitting before being allowed to locate in the same neighborhood. If the personal care home served four or fewer residents, it would not be subject to special use permitting, but would be subject to other limitations (e.g. limits on the degree to which the dwelling can be expanded and stipulations that construction be consistent with the character and scale of the surrounding neighborhood) that are not also placed on other types of dwellings.

**Recommendation:** It is recommended that the City convene a discussion among interested and affected community stakeholders of the effects of its ordinance on the location of personal care homes. The City should further facilitate a meeting between this stakeholder

group and local planning staff and officials to determine whether changes to the City's ordinance may be appropriate.

#### **Impediment #4: Local Attitudes Resisting Fair Housing Opportunities**

Evidence gathered from interviews, public meetings, and survey responses suggests a strong "Not In My Backyard" (NIMBY) attitude held by some Rome residents. In the course of this Analysis, the NIMBY position was found in response to a wide variety of housing types, including personal care homes, Housing Choice Voucher-assisted rentals, and affordable housing in general. While it is important for citizens to be consulted in land use decisions in their communities, it is equally important that those citizens be knowledgeable of fair housing law. Where a residential land use is proposed in a residential area, it is problematic to yield to local resistance based on the type of people who will occupy the proposed housing.

Some residents related anecdotal evidence of steering by real estate agents and others suggested that race-based discrimination occurred among both mortgage lenders and real estate agents. Education and awareness of fair housing law is imperative to alleviating NIMBYism and discriminatory attitudes and should be an ongoing activity if it is to begin addressing the lack of general awareness concerning fair housing issues among residents and professionals in the city. As the city's population becomes increasingly diverse, fair housing education must be continuous and presented in a context that is relative to the current community concerns. Additionally, fair housing education must be presented in a manner that is linguistically appropriate and culturally sensitive.

**Recommendation:** To combat the negative attitudes of some city residents toward various types of fair and affordable housing, the City must begin implementing a systematic model of fair housing education, beginning with the City's Community Development staff and CDBG subrecipients. The City should collaborate with its FHEO and/or with local fair housing advocacy organizations on the development of an appropriate curriculum and then make it a mandatory requirement for staff, subrecipients, and any other entities the City may contract with under its CDBG program. Over time, the training program should be expanded and offered to the public, by holding workshops or by sending speakers to club meetings and other gatherings. Observance of Fair Housing Month each April is encouraged and should include a proclamation from the City Commission, a press release and an event drawing attention to the issue. The City should additionally consider setting aside a portion of its annual CDBG allocation, perhaps seeking a match from the local Board of Realtors or another housing or civic-minded organization, as a fair housing grant, to be competitively awarded to nonprofits or other organizations that can assist the City in carrying out these recommendations.

### Impediment #5: Lack of Fair Housing Education

Rome's previous Analysis of Impediments, prepared in 2009 described a need for a local organization to provide fair housing education and to receive housing discrimination complaints. The Appalachian Housing Counseling Agency was organized to take on this role, but more work needs to be done. All local housing discrimination complaints filed during the period studied for this Analysis were filed either with HUD or with the Georgia Commission on Equal Opportunity. No complaints were filed locally. When asked about the availability of fair housing education, many people interviewed were not aware of any such programs. Others equated fair housing education with resources on homeownership or money management.

Results of the Fair Housing Survey indicate that Rome residents are not especially knowledgeable of their fair housing rights and a majority do not know how or where to file a complaint if they feel their rights have been violated. Of those residents who reported facing housing discrimination, none filed a formal complaint.

**Recommendation:** As recommended with Impediment #4, the City should consider annually reserving a portion of its CDBG public service funds to be awarded as a competitive Fair Housing Grant to an organization that will carry out a focused fair housing education program in the area. As a component of the Fair Housing Grant, the successful applicant should launch and sustain an education campaign to increase the public's awareness of housing discrimination and of the process for filing a complaint.

## Conclusion

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Through this Analysis of Impediments to Fair Housing Choice, several barriers have been identified that restrict the housing choice available to residents of Rome; these barriers may prevent residents from realizing their right to fair and equitable treatment under the law. It is imperative that residents know their rights and that those providing housing or related services know their responsibilities. The City of Rome will work diligently toward achieving fair housing choice for its residents using the recommendations provided here to address the identified impediments. However, it should be noted that these impediments are largely systemic and will require effort from both private sector and public sector actors to correct. The City has an important role to play but cannot on its own bring about the change necessary to remove these impediments to fair housing choice.

The recommendations proposed in this document address impediments relative to substandard housing, a limited supply of accessible and affordable housing options, the uneven distribution of community resources, restrictive zoning provisions, local attitudes resisting fair housing, and a lack of fair housing education. Implementation of the recommendations can assist the City of Rome in achieving the reality of being an open and inclusive community that truly embraces fair housing choice for all its residents.