

Analysis of Impediments to Fair Housing: 2010 Update

To Satisfy the Requirements of 24 CFR § 91.225(a)(1)

May 13, 2010

(Original Study, 1996)



CITY OF COLLEGE STATION

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1.0 The Analysis

This Analysis coincides with the City of College Station's 2010-2015 Consolidated Plan and updates previous analyses that were completed in 1996 and 2005. The study was performed in order to satisfy the requirements of 24 CFR 91.225(a)(1), titled "Certifications", which states:

"Affirmatively furthering fair housing. Each jurisdiction is required to submit a certification that it will affirmatively further fair housing, which means that it will 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 that analysis, and maintain records reflecting the analysis and actions in this regard." This update was performed to meet that requirement.

Impediments to fair housing choice are considered by the U.S. Department of Housing and Urban Development (HUD) to be any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin that restrict housing choices or the availability of housing choices. Currently, the City of College Station's code does not include disability or familial status as protected classes; the code will be rewritten this year to amend these omissions. The Analysis of Impediments (AI) is not directly approved by HUD, though a summary of its contents is a required component of the City's Consolidated Plan. HUD advises that the AI serve as the substantive, logical basis for local fair housing planning; provide essential and detailed information to policy makers, administrative staff, housing providers, lenders, and fair housing advocates, and; be utilized to build public support for fair housing efforts both within the City's boundaries and beyond.

This analysis must be updated every three to five years.

Objectives

The Analysis of Impediments (AI) update has three major objectives:

- Identify impediments to fair housing choice within the City of College Station.
- Recommend appropriate actions to overcome the effects of identified impediments.
- Serve as a formal record of the City's attention to fair housing issues.

Sources and Methods

This study utilizes data from the U.S. Census Bureau, the Real Estate Center at Texas A&M University, the Bryan/College Station Association of Realtors Multiple Listing Service, the City of College Station Community Development, Geographic Information Systems, and Planning and Development Services Departments, the Brazos County Appraisal District, FFIEC, and the Bryan College Station Economic Development Corporation.

The Analysis of Impediments to Fair Housing was completed by the staff of College Station's Economic and Community Development Department.

Summary of Findings and Recommendations

This analysis of impediments to fair housing choice in the City of College Station identified the following fair housing concerns:

- Rising numbers of fair housing complaints indicate that fair housing public education outreach and efforts have been successful; citizens know their rights and are successfully able to register their complaints for arbitration. However, the steady number of complaints also point out that some residents of College Station continue to face obstacles, whether real or perceived, in their pursuit of fair housing.
- Most dilapidated housing is located in low to moderate income areas which are also areas of minority concentration.
- A review of advertising indicates that local housing providers, lenders, and insurers need to be more diligent to include fair housing logos and diverse human models, as well as bilingual advertising.
- Review of the most recent home mortgage loan data (HMDA) from 2008 indicated that minority and low- to moderate-income applicants see their loan applications denied at higher rates than do White and/or high-income applicants.
- Most of the fair housing complaints registered in College Station relate to the denial of rental housing.
- Rather than constructing concentrated affordable housing, the City promotes scattered site, low-density low-moderate income housing in the belief that this approach helps limit concentrated areas of poverty in the City.
- Current limits on the numbers of occupants in a single family dwelling meet the test of reasonableness under the Fair Housing Act. However, the City must be careful that any further reductions in the number of occupants allowed are not unreasonable.
- Advertisements for home sales and rentals frequently contain a "No HUD" stipulation.

Given these concerns and potential barriers to fair housing in College Station, the following actions are recommended:

- Continue and increase successful fair housing educational and outreach activities to ensure a greater distribution of bilingual materials on the Internet, in the public library, and on public service radio and television.
- Continue rehabilitation and reconstruction programs, targeting clusters of dilapidated housing in low-mod minority areas.
- Work with local lenders, insurers, and housing providers to ensure non-discrimination in advertising and in providing housing and housing services.
- Continue to support and partner with private Housing Tax Credit developers to construct new, safe, decent, affordable, and sustainable rental housing, particularly for the low-income elderly.

- Carefully review any future requests to reduce the allowable number of occupants in a single-family dwelling to ensure that the test of reasonableness under the Fair Housing Act is met.
- Continue to require developers of properties containing five or more HOME-assisted units to prepare and submit an Affirmative Fair Housing Marketing Plan adopted from HUD Form 935.2. This plan ensures affirmative marketing of affordable units.
- Work to educate the public about the Section 8 Housing Voucher Program in an attempt to decrease the number of residents who refuse to lend or sell housing to HUD-sponsored buyers.
- Educate private lenders about the need for equity in the approval of home loan applications. At the same time, the City will work with minority and low-income applicants to help them put together high-quality loan applications and understand the importance of good credit and sound financial practices.

2.0 The City of College Station

The Bryan/College Station (B/CS) Metropolitan Statistical Area (M.S.A.) is comprised of two independent and similarly-sized cities, Bryan and College Station, Texas, with a combined population of nearly 150,000. The M.S.A. encompasses 585.78 square miles and is located in Brazos County in central Texas. The B/CS M.S.A. is roughly 95 miles northwest of Houston, 104 miles northeast of Austin, and 99 miles southeast of Waco, in the center of a triangle formed by Dallas, Houston, and San Antonio. Approximately 61% of the Texas population resides within a 2.5-hour drive of College Station. The city of College Station is a growing city with a population reaching over 80,000, anchored by the presence of Texas A&M University.

Population

College Station is a youthful, growing city. The local population increased dramatically over the last decade, jumping 21.8% from 2000 levels to a total of 82,691 in 2008. The region around College Station also experienced overall population growth during the last decade.

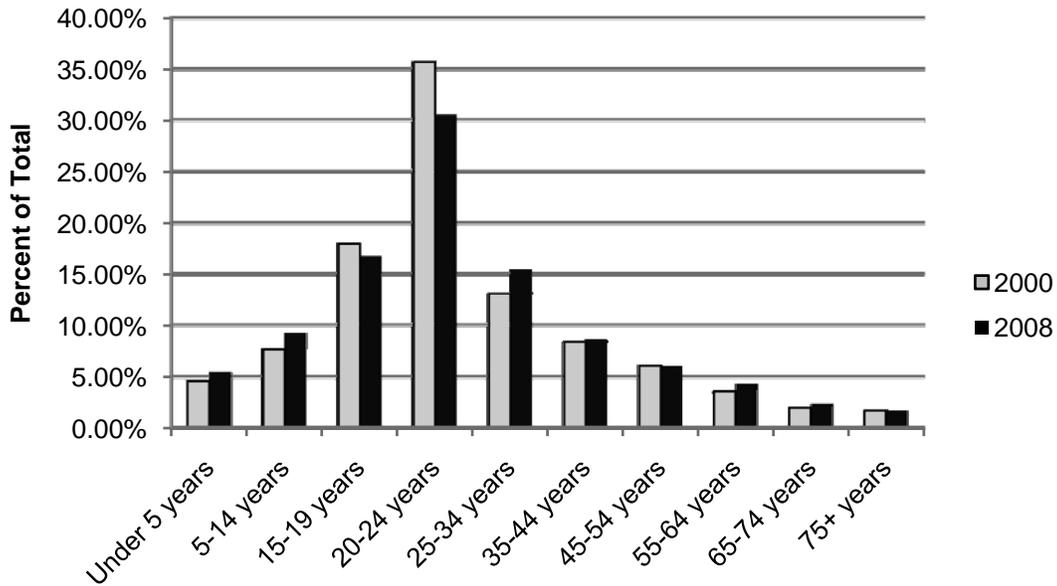
Year	Population
1990	52,456
2000	67,890
2008	82,691

Data: 2008 ACS

The 2008 ACS reports the location of residence in the previous year for College Station residents, indicating migration into or out of the City. In 2008, College Station welcomed nearly 20,000 new residents from within the state of Texas and just over 2,000 new residents from abroad. About 2,700 new residents came to College Station from states other than Texas. This steady increase in population is expected to translate into continued strong demand for housing.

Population by Age: The tens of thousands of students who flock to Texas A&M University have a big impact on the city's demographics: in 2008, the median age in College Station was 22.4, six years younger than the median age in College Station's sister city, Bryan. The median ages in Texas and the greater United States are over a decade older. About 30% of the population in College Station falls within the ages of 20-24; that number is only 7.3% statewide.

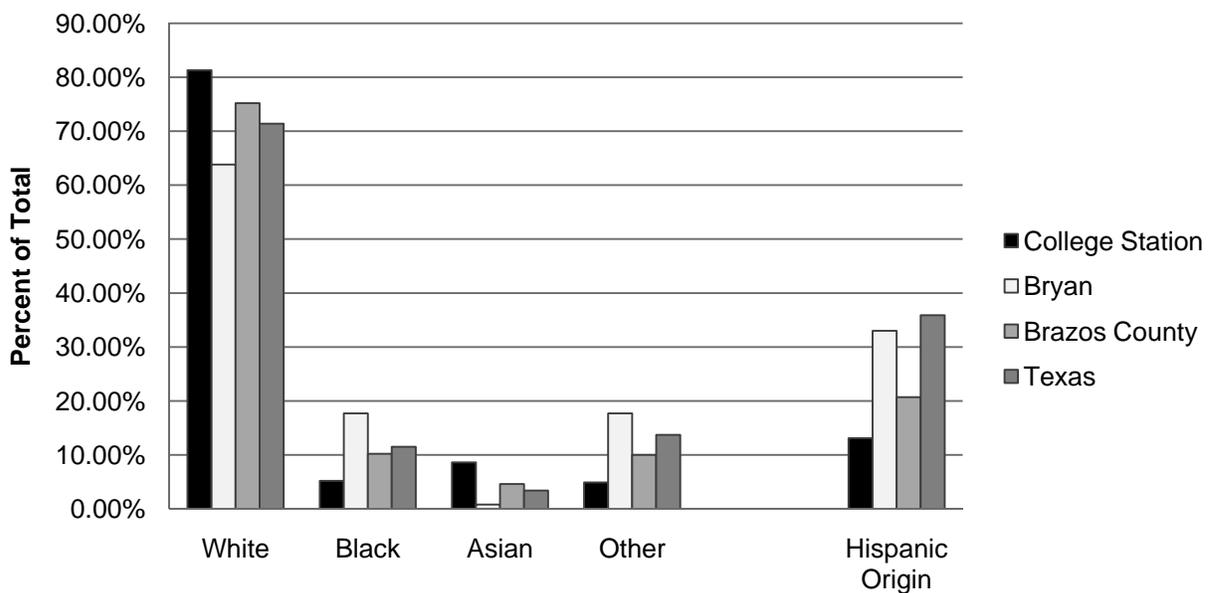
Figure 2: College Station Population by Age



Data from U.S. Census Bureau, American Community Survey, 2006-2008

Race/Ethnicity: Much of College Station’s diversity can be attributed to the presence of Texas A&M University, which attracts faculty and staff from across the country and around the world. In 2008, persons of Hispanic or Latino origin represented 13.1% of the local population, a number far lower than the rates seen in both the City of Bryan (33.0%) and the State of Texas (35.9%). The number of persons of Black or African American origin is also comparatively low, at 5.2%, compared with 17.7% in Bryan and 11.5% in the state at large. However, College Station does have a comparatively high number of residents who claim Asian descent, making up 8.6% of the population. Persons of White or European decent represented 81.3 % of College Station residents, about 10 percentage points higher than the statewide rate.

Figure 3: College Station Population by Race/Ethnicity



Data from U.S. Census Bureau, American Community Survey, 2006-2008

Population Projections: College Station's population projections for 2000-2025 were calculated for the City of College Station Development Services in 2009 (College Station Demographic Report 2009). Based on an average of the three demographic methods used, there is expected to be a nearly 25% jump in the population by 2015. Subsequently, the rate of growth is expected to gradually decline, leaving College Station with a population of about 124,219 by 2025.

Year	Population	% Change
2000	67,898	-
2005	81,930	20.7%
2010	82,691	0.9%
2015	103,112	24.7%
2020	113,665	10.2%
2025	124,219	9.3%

Data from College Station Demographic Report, 2009

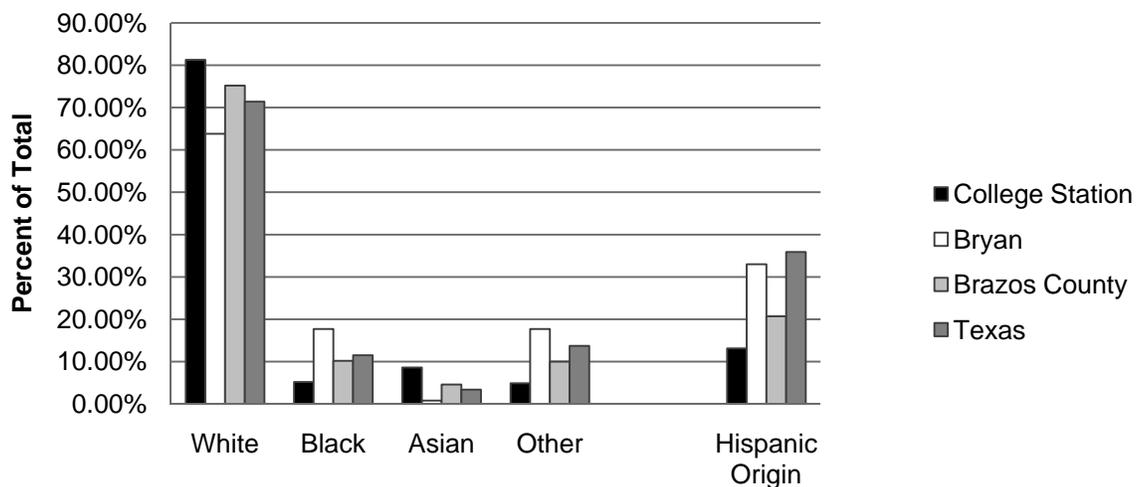
English Proficiency

The vast majority (82.6%) of College Station's residents speak English at home. Of those who speak a language other than English at home, just 5.6% report that they speak English less than "very well". This segment of the population who struggles with limited English proficiency is comprised mainly of those who speak either Spanish or an Asian/Pacific Islander language.

Education

When compared with the rest of the state of Texas, College Station has a very well-educated population. In 2008, 57.5% of College Station residents over the age of 25 had completed at least a Bachelor's degree or higher, more the double the number who achieved similar levels of education attainment statewide. However, this represented a decrease of 0.6% from the 2000 Census levels. The number of residents who failed to complete high school rose, from 6.2% in 2000 to 7.4% in 2008. The statewide number of high-school dropouts stands at 20.8%, nearly three times College Station's rate.

Figure 5: Race/Ethnicity



Data from U.S. Census Bureau, American Community Survey, 2006-2008

Income

Per capita income levels have risen in College Station, from \$15,170 in 2000 to \$19,934 in 2008. Median family income also increased by about \$15,000 during those years, reaching \$68,400 in 2008. However, a substantial number of College Station residents struggle with poverty; as of 2008, 14.5% of local families were living below the poverty line.

Employment

In 2008, there were 94,700 jobs in the Bryan/College Station M.S.A., an increase of 9.1% from 2004 levels. Thirty-one percent of College Station's workers are employed by the government; this high percentage is directly attributable to the many residents who work at Texas A&M University. The University is the largest contributor to College Station's economy: it employs over 12,000 academicians and support staff and had an estimated economic impact of about \$2.7 billion in 2007, according to a study conducted by the Texas A&M Division of Finance

Texas A&M University is by far the largest employer of College Station residents. Other large employers in the Bryan-College Station area include the St. Joseph Health System; both the Bryan and College Station Independent School Districts; Sanderson Farms, a poultry processing plant; Reynolds & Reynolds, a computing firm, and the City of College Station. Each of these entities employs at least 1,000 local residents (as of 2009). The unemployment rate in College Station was approximately 3.3% at the end of 2008 and has continued to be among the lowest unemployment rates in Texas.

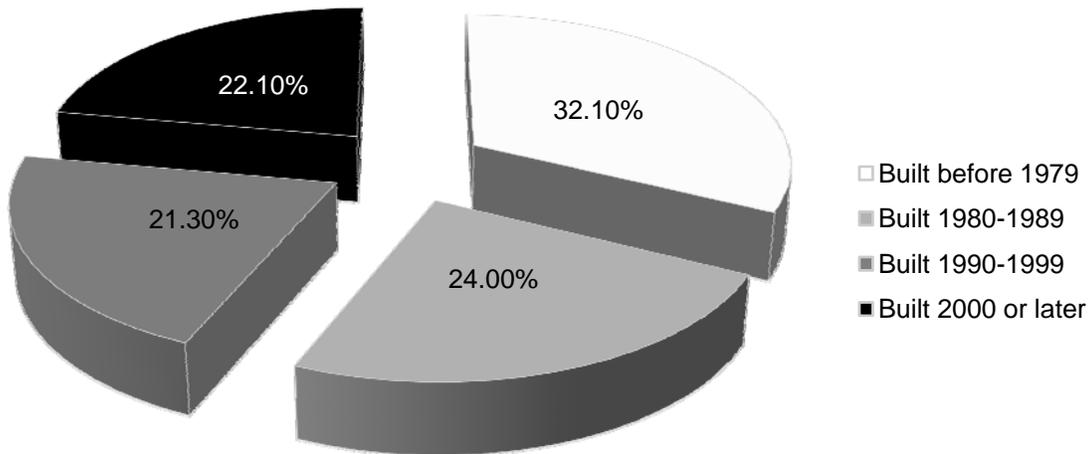
Households

As of 2008, College Station had 82,691 persons (28,798 households) living in 32,593 housing units, with an average household size of 2.5 persons. The average family size is 3.04. The ACS found 13,461 family households (46.7% of the total) and 15,337 non-family households (53.3% of the total). The number of non-family households is high because of the large student population. There were 2,566 female-headed households as of 2008, with nearly 60% of these households reporting children under age 18. Statistically, these single-parent households tend to be low-income and consequently experience financial burdens when it comes to seeking and providing shelter.

3.0 The Housing Market

College Station is a relatively new community, evidenced by the fact that almost 70% of its housing units were built after 1980, resulting in fewer dilapidated units than are normally seen in similarly sized communities.

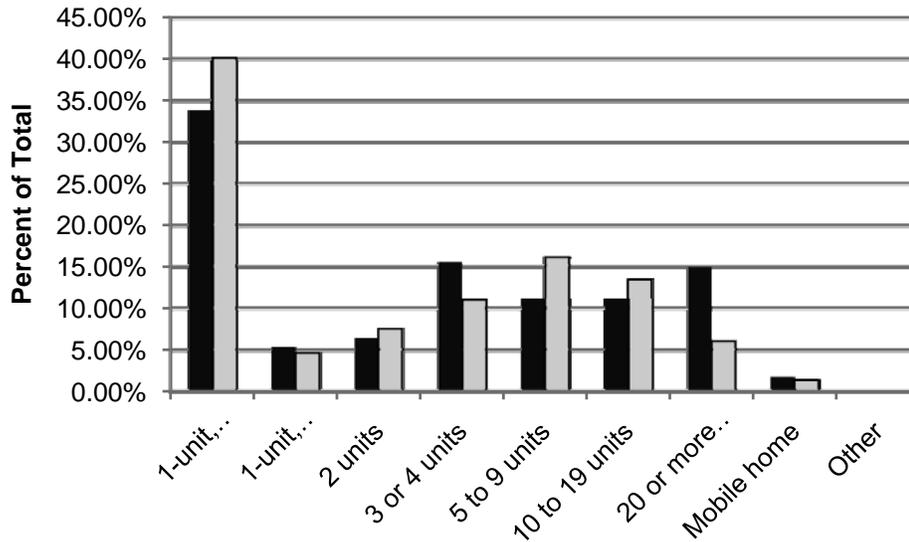
Figure 6: Age of Housing



Data from U.S. Census Bureau, American Community Survey, 2006-2008

The 2008 American Community Survey indicated that 88.4% of the 32,593 residential units in College Station were occupied. Fifty-four percent of the local housing structures contain two or more housing units (apartments, duplexes, etc.). This high number of multi-family units is due to the presence of Texas A&M University and Blinn College, which leaves the housing market in College Station heavily impacted by a large student population. However, single-family detached homes are becoming a larger percentage of the total housing stock, perhaps due in part to the increase in average family size in College Station, which rose from 2.98 in 2000 to 3.04 in 2008.

Figure 7: Types of Housing



Data from U.S. Census Bureau, American Community Survey, 2006-2008

In 2008, the median home value for owner-occupied homes was \$165,300. The average home sold in 2004 went for \$155,947; by 2009, the average home sale price rose to \$190,240.

Rent Profile

Sixty-five percent of all home dwellings in the City of College Station are rented (2008 American Community Survey), so multifamily housing cost and affordability is of particular importance to the local community. The 2008 ACS indicates that 61.4% of College Station renters pay a rental price that takes up at least 30% of their household income, a number that is significant, since 30% generally considered the maximum affordable gross rent as a percentage of household income. The average multi-family rents in College Station are below the HUD Fair Market Rents (FMR's) by 11.7% to 20.1% in all housing categories; the exception was four bedroom apartments, where College Station's average rents exceed the HUD FMR by 9.5%. HUD FMR's include all utilities except telephone, and are designed to represent the 40th percentile of rental units. An analysis of the HUD FMR trend for the market area indicates that multi-family monthly rental rates have risen fairly steadily across all unit types, with average annual rent increases ranging from 3.92% to 4.59% over the past five years. HUD FMR's for the market area do not necessarily accurately reflect the current rental rate trends for the 40th percentile of units in College Station specifically, but do give an idea of the trends in rents throughout the Bryan and College Station market area as a whole.

FMR Year	0 BR	1 BR	2 BR	3 BR	4 BR
FY 2005	\$484	\$550	\$674	\$876	\$903
FY 2006	\$497	\$562	\$686	\$869	\$896
FY 2007	\$517	\$585	\$714	\$905	\$932
FY 2008	\$563	\$637	\$778	\$986	\$1,016
FY 2009	\$591	\$668	\$816	\$1,034	\$1,066
FY 2010	\$605	\$685	\$836	\$1,059	\$1,092
Average Annual Increase	4.59%	4.51%	4.43%	3.92%	3.92%
Data: HUD					

	0 BR	1 BR	2 BR	3 BR	4 BR
Average College Station market rent	\$520	\$613	\$696	\$912	\$1,206
FY 2010 HUD FMR	\$605	\$685	\$836	\$1,059	\$1,092
\$ Difference	-\$85	-\$72	-\$140	-\$147	\$114
% Difference	-16.3%	-11.7%	-20.1%	-16.1%	9.5%
Data: Texas A&M Real Estate Center; HUD					

The median rent in College Station rose from \$597 in 2000 to \$724 in 2008, for an increase of 21.3%. During this time, the area median family income also increased, from \$43,600 to \$57,405, an increase of 31.7%. These increases leave average rents well within the range of affordability for the median family. However, it is important to keep in mind that many renters fall below this median, since the median income for renter-occupied households is 80.4% lower than the median income for owner-occupied households.

Median Household Income 2000	2000	2008 ACS
Total	\$20,978	\$39,161
Owner Occupied	\$69,371	\$62,610
Renter Occupied	\$13,575	\$21,354
Data: 2000 Census, 2008 ACS		

The chart above reveals the vast disparity between the median incomes of renters and owners in College Station. Homeowners earned about three times more income than renters, according to the 2008 ACS. It would not be appropriate, however, to assume that increasing the supply of multi-family units would lead to lower market rents and a decreased rental burden for low-income households or families with children. A high percentage of renters in College Station are university students. Many can either afford the current rental rates because of gifts provided by external sources and/or share rental costs with roommates. This tends to support higher prices in the market.

Student Demand

Large numbers of students create a significant demand for local off-campus housing. Texas A&M students make up the bulk of student demand for local housing; over the years, the number of students enrolled has increased, while the amount of available on-campus housing has decreased. This combination forces students into the off-campus housing market.

Texas A&M University, Undergraduate and Graduate	48,702
Texas A&M Health Science Center*	847
Blinn College, Bryan Campus**	10,900
Total Students Enrolled	60,449
On-Campus Housing (Texas A&M)	-9,768
Local Student Off-Campus Housing Demand	50,681

Source: Texas A&M Health Science Center Office of Institutional Effectiveness, Texas A&M Office of Institutional Studies and Planning, and The Eagle

* Students from Bryan/College Station campuses: College of Medicine, College of Nursing, and School of Rural Public Health.

**NOTE: An estimated number of 2,300 students were enrolled simultaneously at Blinn & TAMU. However, it is not known if these students lived on- or off-campus. Thus, the total count for local housing demand should be adjusted slightly lower.

The major impact of Texas A&M and Blinn College students in the local multi-family market is their contribution toward a cyclical seasonality associated with semesters. Fall, spring, and summer occupancy rates must be considered separately when analyzing local housing data. Typically, occupancy ranges vary significantly from season to season. Fall semesters (September through mid-December) represent the highest occupancy rates, followed by spring (January through mid-May), with the lowest occupancy period occurring over the summer (Mid-May through mid-August). Many lease terms last for just nine months, for the fall through spring academic year. These factors have led to higher rental rates for leases beginning in the fall semester in an effort to minimize the negative effect of the 9-month lease terms preferred by most student renters. Summer rental discounts are commonplace.

Homeownership Profile

For housing in the city to be considered affordable, monthly payments must remain at or below 30% of household income. To remain affordable based upon the current median family income, mortgage payments may not exceed \$1,438 per month for households in the City of College Station. The median home sold in 2009 was priced at \$161,900, based upon sales price data from the Bryan/College Station Multiple Listing Service.

It is likely that price appreciation in the city will continue at the overall market appreciation rate. It is anticipated that increases in wage rates and household incomes driven by a strong local employment market will keep pace with future property value increases.

Low- and Moderate-Income Areas and Areas of Minority Concentration

The following maps illustrate the low/mod areas of the City by Census Tract; these are areas where more than 50% of the tract population earns less than 80% of the area median income. Areas of minority concentration are defined as any neighborhood in which the percentage of the households in a particular racial or ethnic minority group is at least 10 percentage points higher than that for the City overall. In the 2008 American Community Survey it was estimated: African Americans/Blacks-5.2%; Hispanic or Latino-13.1%; and Asians-8.6%. The following racial groups have less than a 10% concentration people in any Census Tract in College Station: American Indian/Alaska Native, Native Hawaiian or Pacific Islander, or any race combination.

Figure 12: African American/Black Concentration in 2000 Census

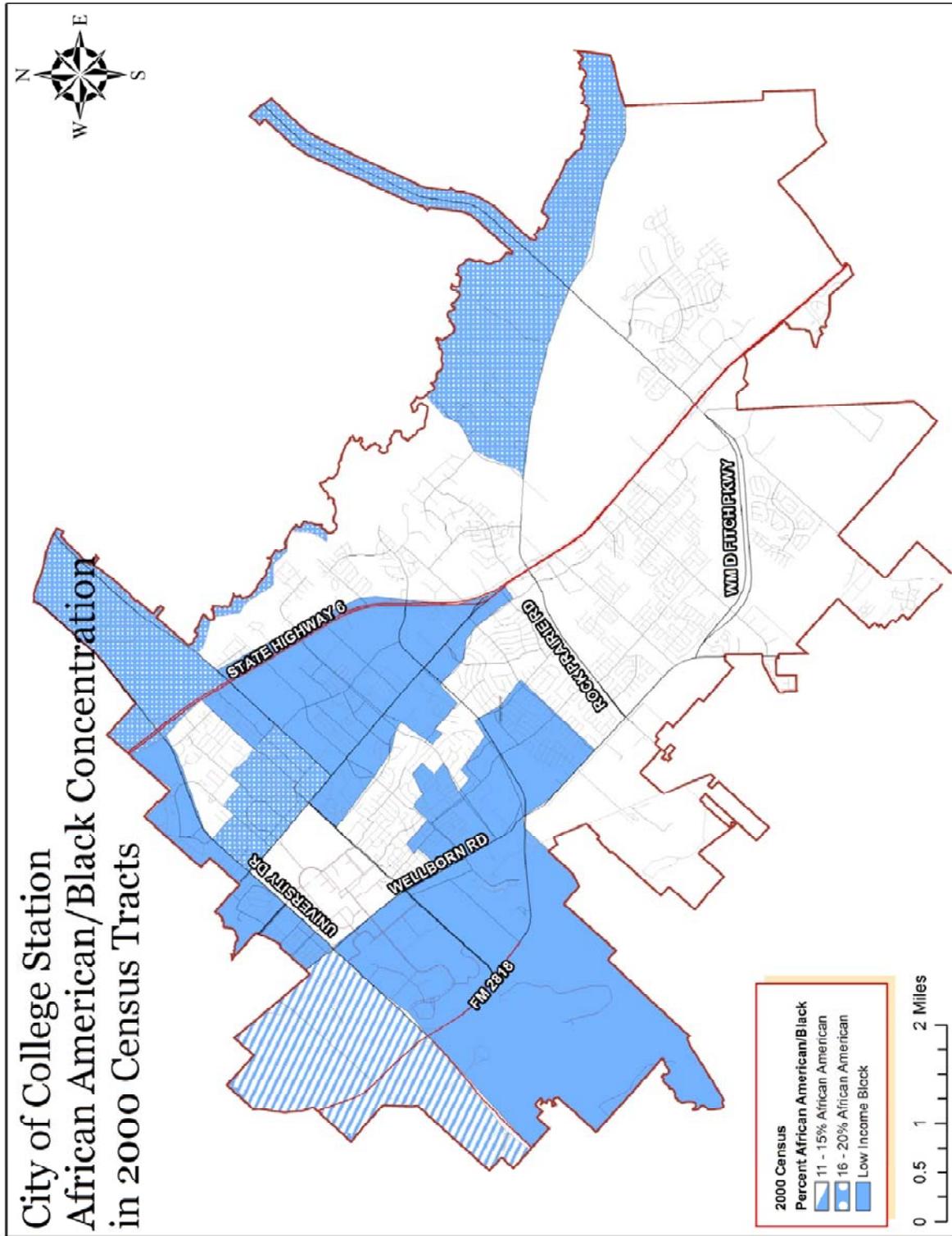


Figure 13: Asian Concentration in 2000 Census

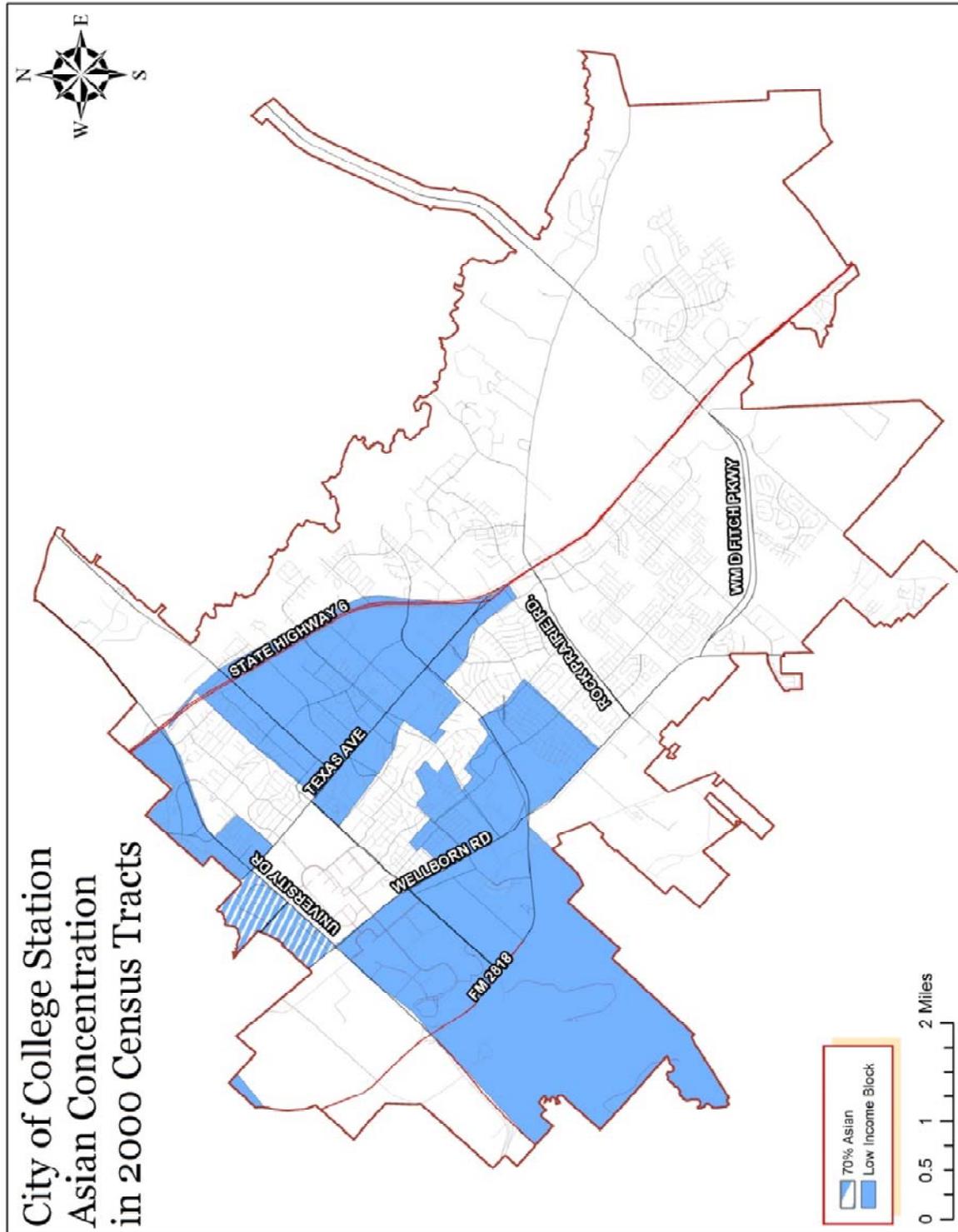
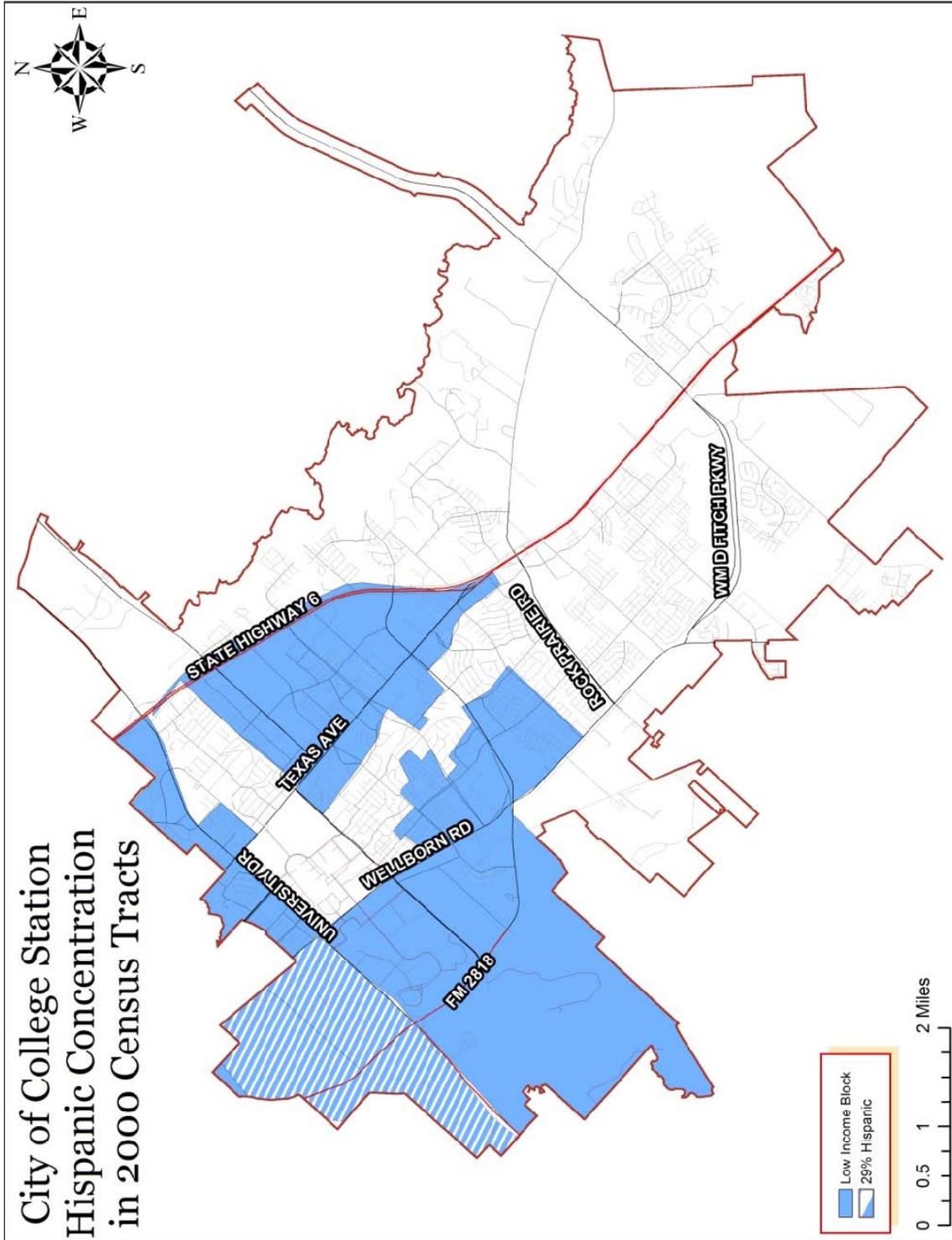


Figure 14: Hispanic Concentration in 2000 Census Tracts



Housing Costs

The U.S. Department of Housing and Urban Development defines affordable housing as housing that does not consume more than 30% of a family's gross income. The following chart illustrates housing expenses based on three units with varying sales prices. A sales price of \$161,900 represents the annual median sales price of homes in College Station in 2009. The average home purchased through the City's Down-payment Assistance Program in 2009 was priced at \$99,000, and the \$130,000 figure represents the midpoint between these two prices.

	Average % of Sales Price	Sales Price		
		\$99,000	\$130,000	\$161,900
Principal and Interest with a 3% down-payment	5.5%	\$553.95	\$727.41	\$905.91
Property Taxes	2.1724%	\$163.56	\$219.68	\$277.43
Homeowners Insurance	.5%	\$41.25	\$54.17	\$67.46
Mortgage Insurance	.078%	\$6.37	\$8.37	\$10.42
Total Housing Expenses		\$765.13	\$1,009.62	\$1,261.21

Only households with an income of \$50,449 or more could purchase a home costing \$161,900. Homes sold in College Station below the price of \$100,000 made up only 6% of the total sales in the City in 2009. Units below \$100,000 in price range are more likely to be older and in poor condition and could be small condominium units. Low-income households looking for affordable units in the City have indicated that there are very few units available in this price range.

Average Single Family Sold Price: The average sale price of a home sold in 2008 in College Station was \$190,240, according to the Bryan/College Station Regional Association of Realtors Multiple Listing Service. The chart below notes the breakdown of homes sold in College Station in 2009 by price range and computes average sales price, average square footage, days on market, cost per square foot, and total units sold:

Sale Price	Avg. \$ Price	Avg. Sq. Ft.	Avg. Days on Mkt	Avg. \$/Sq.Ft.	# of Units	% Total
Under \$50K	\$39,120	807	64	\$48.43	5	0.39%
\$50K-\$99,999	\$81,137	1,091	94	\$74.36	67	5.29%
\$100K - \$149,999	\$133,063	1,372	97	\$96.96	392	30.94%
\$150K - \$199,999	\$168,854	1,746	122	\$96.73	454	35.83%
\$200K - \$249,999	\$223,455	2,195	125	\$101.79	143	11.29%
\$250K - \$299,999	\$273,579	2,638	138	\$103.72	91	7.18%
\$300K and over	\$432,456	3,292	159	\$131.37	115	9.08%
Overall Average	\$190,240	1,847	118	\$103.00	1267	100%

Source: Bryan College Station Regional Association of Realtors® Multiple Listing Service

The highest proportion of homes sold (35.83%) was in the \$150,000 to \$199,999 price range. The next largest proportion was in the \$100,000 to \$149,999 price range (30.94%).

From 2008 to 2009, the average price of homes sold actually decreased by 1%, although there has been an overall 13.5% increase in the average price of homes sold in the City of College Station since 2005.

Average Single Family Price per Square Foot: Analysis of the average sold price per square foot data shows that homes sold are somewhat smaller and are becoming more expensive. Homes in the predominant \$150,000 - \$199,999 price range sold for an average \$96.73 per square foot, and the majority of homes sold contain fewer than 2,000 square feet. The overall average per square foot price in the City of College Station in 2009 was \$103.00.

The average price per square foot increased 2.3% from 2008 to 2009, and there has been an overall increase in the average price per square foot of 17.0% since 2005.

Ad Valorem Property Taxes: A significant contributor to the cost of homeownership is the ad valorem (Property) tax. The Brazos County Appraisal District appraises all properties within Brazos County to be assessed ad valorem taxes by the taxing entities. The basis of assessment is 100% of taxable value. The following chart illustrates the ad valorem tax rates per \$100 valuation:

Entity	Tax Rate
City of College Station	\$0.4394
College Station I.S.D.	\$1.2534
Brazos County	\$0.4800
TOTAL	\$2.1728

Annual property taxes for the average home sold in the City of College Station in 2009 with an appraised value of \$190,240 (including the \$15,000 homestead exemption for school taxes) would be \$3,940.71. Property taxes for the median-priced home would be \$3,325.73. Property tax exemptions are available for homeowners through the homestead exemptions and exemptions for the disabled, veterans, and the elderly.

In 2006 College Station I.S.D. lowered its tax rate, but overall tax rates have remained fairly steady over the past several years. The rise in property tax appraisal values in the City of College Station has resulted in an increase in property tax revenues, even though the total property tax rates were lowered almost 20% over a five year period, down from \$2.7078 in 2004.

Homeowners Insurance: Another component of homeownership cost is insurance. The 2008 average insurance premium rates for homes located in Brazos County, as reported by the Texas Department of Insurance, are \$898 per year. The size of the average homeowners' policy is \$197,600. These numbers are substantially lower than the statewide average rates, which are \$1,272 for an annual premium on an average policy worth \$200,400.

Mortgage Interest: Mortgage interest rates continue to remain low, and are expected to remain at low levels for the foreseeable future.

Lender	15 Yr	Points	30 Yr	Points
Bank of America	-	-	4.750%	0.00%
Citibank	4.375%	0.25%	5.000%	0.125%
Commerce National Bank	5.250%	0.00%	5.625%	0.00%
Cornerstone Mortgage	-	-	5.180%	0.00%
Prosperity Bank of Bryan	4.850%	0.00%	-	-
Texas Liberty Mortgage	4.250%	0.00%	4.750%	0.00%
Average	4.681%	0.25%	5.061%	0.125%

Source: June 2010

Rental Prices: Rents in the Bryan/College Station apartment market are a little lower than the statewide average. The overall occupancy rate, at 95.8%, is higher than the Texas average, although occupancy in newer apartments (built since 2000) dips down to 93.7%.

	Bryan/College Station	Texas Metro Average
Average rent (\$/sq. ft.)	\$0.78	\$0.83
Average rent for units built since 2000 (\$/sq. ft.)	\$0.85	\$0.90
Average occupancy	95.8%	93.9%
Average occupancy for units built since 2000	93.7%	94.9%

Source: Real Estate Center, Texas A&M University

Residential Development Activity

Single family housing starts are down 14% since 2008. The average permit value in 2009 was \$139,085, a significant decrease from \$152,409 in 2008 (Note that permit value does not include cost of land). Housing starts in 2008 were 4% lower than in 2005, but were a 16% increase compared to 2000 levels. Value per unit constructed was significantly higher as well, up 25% from the average 2000 single family permit value of \$110,697. This reflects not only rising costs for materials, but also the strong demand for new homes over the past eight years. However, the sharp recent decrease in both number of starts and permit value in 2009 demonstrates how the uncertainty of the national economy and housing market has affected the College Station community.

Primarily because of the location of Texas A&M University within the city limits, there are a large number of students seeking housing. This has encouraged the existing housing stock in College Station to tend toward a high percentage of rental units. The 2008 ACS estimated that just 30% of College Station's residences are occupied by homeowners. Thus, 65% of the housing market in College Station is rental property, compared to an average of 32.9% Texas-wide. New building permits in College Station were issued more frequently for single-family housing units than for multi-family housing units until 2007. In both 2007 and 2008, permits for multi-family housing edged out other all other housing categories (Source: City of College Station Planning and Development Services)

Multifamily construction activity has been volatile since 2000, with a high of 760 new units in 2008 and a low of 21 units in 2009. Per-unit permit values in 2009 were \$85,714 per unit, up 85% from \$46,226 per unit in 2000, but a decrease from the highest per-unit value of \$87,230 in 2005. (Note that per-unit permit values do not include land cost). This significant increase can be attributed to increased cost of construction as well as to multifamily developers' inclusion of additional amenities and higher quality construction to compete in the overbuilt apartment market.

Vacancy Rates

The 2008 rental vacancy rate in College Station was 8%, an increase from a 5% vacancy rate in 2000. This increase may be a sign of overbuilding. The homeowner vacancy rate was 1% in 2008, decreasing from 1.4% in 2000, illustrating the continued high demand for home purchases. College Station vacancy rates are lower than the Texas average, where the homeowner vacancy rate is 2.4% and the rental vacancy rate is 10.4%.

Figure 20: Current College Station MLS Single Family Housing Availability				
April 22, 2010 College Station Listings	Avg. \$ Price	Avg. \$/Sq.Ft.	# Units	% Total
Under \$50K	\$39,300	\$29.48	3	0.42%
\$50K-\$99,999	\$77,735	\$81.81	20	2.83%
\$100K - \$149,999	\$134,546	\$103.25	129	18.27%
\$150K - \$199,999	\$172,937	\$103.72	272	38.53%
\$200K - \$249,999	\$228,177	\$106.12	101	14.31%
\$250K - \$299,999	\$274,832	\$109.70	43	6.09%
\$300K and over	\$514,604	\$142.53	138	19.55%
Overall Average	\$243,551	\$117.15	706	Total Units
Source: BCS MLS				

Months inventory estimates the number of months it will take to deplete current active listings of inventory based on the level of the previous 12 months of sales activity. According to the Real Estate Center at Texas A&M University, the Bryan/College Station market area has a nearly 7 Months Inventory based upon the 2008 MLS data. This figure is down slightly from the year before. According to research from the Texas A&M University Real Estate Center, on average, six months of inventory is the point at which prices remain stable. More than six months of inventory signals a trend toward lower prices.

Low-Income Housing

The following chart details facilities that offer housing options for low-income residents.

Figure 21: Low-Income Housing Facilities				
Organization or Service	Type of Housing Assistance	Target Population	Number of Units and Annual Number Assisted	Contract Period
The Haven	LIHTC/Rental Assistance	Special Needs	24 Units	LIHTC ends 2031
Heritage at Dartmouth	LIHTC/Rental Assistance	Low/Mod Income	85 Units	LIHTC ends 2029
LULAC Oakhill Apartments	Section 202 Project-Based Rental Assistance	Elderly/Disabled Households with Incomes Less than 50% of Median	50 1-bedroom units	Section 202-5 year contract ends Sept. 2011
Santour Court	LIHTC/HOME	Households with Income Less than 80% and 60% of Median	16 Units	LIHTC ends 2037 HOME ends 2047
Southgate Village Apartments	Section 8	Low/Mod Income	200 Total Units 159 LMI units	Annual contract ending June 2010
Terrace Pines	LIHTC/HOME Rental Assistance	Elderly Households with Incomes Less than 60% of Median	100 Total Units 80 LMI Units	LIHTC ends 2035 HOME ends
Villas of Rock Prairie	LIHTC/Rental Assistance	Elderly/Disabled Households with Incomes Less than 50% of Median	132 Total Units 92 LMI Units	LIHTC ends 2036
Windsor Point Apartment Homes	LIHTC/Rental Assistance	Low/Mod Income	192 Units	LIHTC ends 2036

Public Housing

The following chart lists area providers of supportive housing and summary information related to the specific clients served, type of assistance provided, and number of units available for persons with special needs, including: the elderly, frail elderly, persons with disabilities, persons with alcohol/drug additions, and persons with HIV/AIDS.

Figure 22: Other Assisted Housing Inventory				
Organization or Service	Type of Housing Assistance	Other Services	Target Population	Number of Units and Annual Number Assisted
ELDERLY and FRAIL ELDERLY, PERSONS WITH DISABILITIES				
LULAC Oakhill Apartments 1105 Anderson College Station	Section 202 Project-Based Rental Assistance	Food pantry, I&R, socialization/rec- reation, scheduled transportation	Elderly/Disabled Households with Incomes Less than 50% of Median	50 1-bedroom units
Terrace Pines 819 Krenek Tap College Station	LIHTC/HOME Rental Assistance	I&R, socialization, transportation	Elderly Households with Incomes Less than 60% of Median	100 Total Units 80 LMI Units
Villas of Rock Prairie 100 Mortier College Station	LIHTC Rental Assistance	I&R, socialization	Elderly/Disabled Households with Incomes Less than 50% of Median	132 Total Units 92 LMI Units
Brazos Valley Community Action Agency -Elder-Aid	Accessible Rental Property	I&R, Case Management, telephone reassurance, housing repairs	Elderly/Disabled Households with Incomes Less than 50% of Median	
Crestview 2505 E Villa Maria Bryan	Section 202 Supportive Housing facility located in Bryan	Counseling, bus service, I&R, emergency nursing	Elderly/Disabled households with Income less than 50% of Median	48 beds
Sherwood Health Care Facility 1401 Memorial Bryan	Supportive Housing	Skilled and moderate care	Elderly/Disabled	242 Beds, Includes 32 Secure Dementia Beds
Arbor on the Brazos 1103 Rock Prairie College Station	Supportive Housing	Skilled and moderate care	Elderly/Disabled	60 Beds
Bluebonnet House 3901 Victoria Ave College Station	Supportive Housing	Moderate care	Elderly	139 beds
The Grand Court 2410 Memorial Bryan	Supportive Housing	Moderate care	Elderly	180 units
Brazos Oaks Personal Care Center 8733 N Hwy 6 Bryan	Supportive Housing	Moderate care	Elderly	16 beds
Millican House 2601 E Villa Maria Bryan	Assisted Living	Moderate care	Elderly	30 beds
St Joseph Manor 2333 Manor Dr Bryan	Supportive Housing	Skilled and moderate care	Elderly/Disabled	125 Beds: 44 assisted, 33 secure dementia, 48 skilled

Sheridan on Anderson (Brazos Valley Geriatric Center) 1115 Anderson College Station	Supportive Housing	Skilled and moderate care	Elderly/Disabled	142 Beds
Sheridan of Bryan 2001 E 29 th Bryan	Assisted Living	Skilled and moderate care	Elderly/Disabled	140 Beds
Sheridan on Rock Prairie 1105 Rock Prairie College Station	Supportive Housing	Skilled and moderate care	Elderly/Disabled	120 Beds
Martin Luther Homes -Calder Creek 2518 Dartmouth College Station	Intermediate Care Facility	Case management to facilitate independent living	Females with developmental disabilities	6 spaces
Martin Luther Homes -Louisiana House 2518 Dartmouth College Station	Intermediate Care Facility	Case management to facilitate independent living	Males with developmental disabilities	3 spaces
MH-MR of Brazos Valley -The Family Tree	Residential Facility	Counseling, transportation, employment, I&R	Adults with intellectual disabilities (co-ed facility)	8 beds
MH-MR of Brazos Valley - Home Community Based Services	Supportive Assistance provided in private residences	Case management, counseling, day/evening care	Adults with intellectual disabilities (co-ed facility)	2 homes (4beds each) under state contract
BVCASA –Trinity Living Center	Transitional Housing	Drug abuse counseling mandatory	Homeless males released from TDC with drug history	90 days maximum stay
BVCASA –Women’s Therapeutic Treatment Community	Transitional Housing	Drug abuse counseling mandatory	Homeless females released from TDC with drug history	90 days maximum stay
BVCAA – HOPWA	Supportive Housing, Rental Assistance, Emergency Aid	Supportive services, I&R, counseling	Persons with AIDS/HIV	10-15 months of rental assistance, emergency aid for up to 6 months

The program known as the Section 8 Housing Choice Voucher Program requires all current recipients (certificate and voucher holders) to convert to the Section 8 Housing Voucher Program at the time of their annual recertification for assistance. Currently, 1,775 vouchers have been granted to residents of the Brazos Valley, and about 30% of these are used to obtain housing in College Station.

The Low Income Housing Tax Credit program is a federally funded project aimed at stimulating the construction and rehabilitation of affordable housing by reducing federal income tax liability. Tax credits are awarded on a project by project basis by the Texas Department of Housing and Community Affairs (TDHCA) to qualifying residential developments. According to TDHCA, in order to qualify for tax credits, proposed residential developments must "involve new construction or undergo substantial rehabilitation of residential units (at least \$6,000/unit)."

4.0 Fair Housing Law

National Fair Housing Laws

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

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

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

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

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

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

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

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

Executive Order 11063 prohibits discrimination in the sale, leasing, rental, or other disposition of properties and facilities owned or operated by the federal government or provided with federal funds.

Executive Order 11246 bars discrimination in federal employment because of race, color, religion, sex, or national origin.

Executive Order 12892 requires federal agencies to affirmatively further fair housing in their programs and activities and provides that the Secretary of HUD will be responsible for coordinating the effort. The Order also establishes the President's Fair Housing Council, chaired by the Secretary of HUD.

Executive Order 12898 requires that each federal agency conduct its program, policies, and activities that substantially affect human health or the environment in a manner that does not exclude persons based on race, color, or national origin.

Executive Order 13166 eliminates, to the extent possible, limited English proficiency as a barrier to full and meaningful participation by beneficiaries in all federally-assisted and federally-conducted programs and activities.

Executive Order 13217 requires federal agencies to evaluate their policies and programs to determine if any can be revised or modified to improve the availability of community-based living arrangements for persons with disabilities.

State of Texas Fair Housing Law

Texas Fair Housing Act Texas Property Code, Title 15, Fair Housing Practices, Chapter 301 provides rights and remedies substantially equivalent to those granted under federal law.

Local Fair Housing Law

City of College Station Fair Housing Ordinance Chapter 4, Section 12, Code of Ordinances (Ordinance No. 1197 of November 29, 1979) prohibits discrimination in housing sales, rentals, brokerage, or financing with the City of College Station because of race, color, sex, religion, or national origin.

5.0 Current Fair Housing Programs

Education

City Programming: The City of College Station fair housing education program consists of the following:

- Presentation and dissemination of fair housing material at public meetings.
- Conducts periodic surveys of the local housing industry and agencies to identify issues involving housing discrimination in the community.
- Accepts applications for CDBG funding from eligible public service agencies, including agencies working to further fair housing
- Webpage link to the Department of Housing and Urban Development
- Supports the Texas Cooperative Extension Service, which educates homebuyers about the home-buying process, including fair housing.

Private Programming: Project Unity, a local nonprofit public service organization, occasionally coordinates fair housing seminars for local residents.

Local Board of Realtors/Apartment Association: Both of these organizations conduct regular fair housing training for their members.

Enforcement and Monitoring

City Enforcement and Monitoring: The City of College Station maintains a fair housing ordinance and monitors local fair housing complaints and enforcement.

Local Board of Realtors/Apartment Association/Bankers Association: These organizations provide channels for fair housing complaints and enforcement through arbitration.

State Department of Insurance: The Texas State Department of insurance monitors the policies and procedures of Texas insurers for any potential discrimination.

CDBG Funding

The City of College Station funds the following fair housing activities using CDBG funding:

- Presentation and dissemination of fair housing material at public meetings.
- Conducts periodic surveys of the local housing industry and agencies to identify issues involving housing discrimination in the community.

The City of College Station also accepts applications for CDBG funding from eligible public service agencies, including agencies working to further fair housing.

In-Kind Support

The following are in-kind contributions in support of fair housing provided by the City of College Station:

- Webpage link to the Department of Housing and Urban Development.
- Participates in the Money Smart financial education program sponsored by the Texas Cooperative Extension Service, which educates homebuyers about the home-buying process, including fair housing.

- Display of the Fair Housing Poster prominently throughout the Community Development office, and use of the Fair Housing logo on all promotional materials.

6.0 Fair Housing Complaints

Since 2005, there have been 18 fair housing complaints filed in the City of College Station. This may be attributable to the success of the City's outreach effort to increase public awareness of fair housing issues and to affirmatively further fair housing choice.

The following table illustrates the fair housing complaints within the jurisdictional boundaries of the City of College Station.

Figure 23: Fair Housing Complaints						
Agency	Case Name	Date Filed	Date Closed	Reason Closed	Complaint Basis	Issue
HUD	Adhara Castelblanco v Online Real Estate	03/01/05	11/04/05	No cause	National Origin	Discrimination in terms/conditions/privileges relating to rental
HUD	Hector Olmos v Online Real Estate	03/01/05	11/07/05	No cause	National Origin	Discriminatory terms/conditions/privileges or services and facilities
TWC/HUD	Jennifer Clemons v Stylecraft Custom Home Builders	04/07/05	03/09/06	No cause	Race	Discrimination in the making of loans
TWC/HUD	Thomas W. Johnson v Jessica Deckard	01/10/07	06/26/07	No cause	Disability	-Discriminatory refusal to rent and negotiate for rental -Discrimination in terms/conditions/privileges relating to rental
TWC/HUD	Robert Russell v Brandy Purcell	01/07/09	05/12/09	Complaint withdrawn by complainant without resolution	Disability	Discrimination in terms/conditions/privileges relating to rental
HUD	Kaye Rasler v Georgia Derickson	03/27/09	07/09/09	Conciliation/settlement successful	Disability	Discriminatory terms, conditions, or privileges or services and facilities
HUD	Rhonda Oldham v Amber George	05/05/09	09/15/09	Complaint withdrawn by complainant after resolution	Disability	Failure to make reasonable accommodation
TWC/HUD	Russell Todd Hairston v Newport Management	07/08/09	02/17/10	Conciliation/settlement successful	Race	Discrimination in terms/conditions/privileges relating to rental

TWC	Henryella Siddiqui v Newport Management	07/15/09	09/02/09	Failure to cooperate		
TWC	Brenda Smith v Fercan Kalka, Owner	07/15/09	08/31/09	CP withdrawal		
HUD	Leslie Liere v Nationwide Mutual Insurance Company, et al.	09/15/09	12/30/09	Complaint withdrawn by complainant after resolution	Race, National Origin	-Refusing to provide insurance -Otherwise deny or make housing available -Redlining insurance
HUD	Austin Tenants' Council v Gateway at College Station	03/17/10		Open	Family Status	Discriminatory terms, conditions, privileges, or services and facilities
HUD	Austin Tenants' Council v Callaway Villas, et al.	03/22/10		Open	Family Status	Discriminatory terms, conditions, privileges or services and facilities
HUD	Austin Tenants' Council v The District on Luther	03/22/10		Open	Family Status	Discrimination in terms/conditions/ privileges relating to rental
HUD	Austin Tenants' Council v Crossing Place at College Station	03/23/10		Open	Family Status	Discriminatory terms, conditions, privileges, or services and facilities
HUD	Austin Tenants' Council v The Heights at Luther Street	03/24/10		Open	Family Status	Discriminatory terms, conditions, privileges, or services and facilities
HUD	Austin Tenants' Council v The Zone at College Station	03/30/10		Open	Family Status	Discriminatory terms, conditions, privileges, or services and facilities

Administrative Complaints: No administrative complaints have been received by the City since 2004.

Allegations made through private group, city or state: In March 2010, the Austin Tenants Council filed six fair housing complaints with HUD on behalf of clients in the College Station area. All six of these cases remain open.

Protected groups reporting complaints: Of the 18 complaints on record since 2005, three (16.7%) alleged discrimination based on race, three (16.7%) were from persons of other national origin, and four (22.2%) came from disabled residents.

Complaint issues/allegations: The predominant issue reported by complainants were discriminatory terms/conditions/privileges or services and facilities (66.7%), of which half have been successfully resolved.

Resolution of complaints: Other than the six investigations by HUD which are yet unresolved, all previous complaints have been dismissed, withdrawn, or successfully mediated without need of further legal action.

Other complaints: There are no actions which have been initiated by HUD or DOJ against any company or corporation within the City of College Station.

7.0 Potential Impediments to Fair Housing Choice

Public Sector Impediments

Demolitions/Displacement: Few properties are demolished in the city which would require displacement of residents. Most demolitions are of abandoned, unsafe structures, or structures that have burned. In 2009, three structures in low- and moderate-income level income areas were demolished due to the presence of asbestos. Four vacant structures were also demolished. Displacements relating to replacement housing activities under the City's HOME reconstruction program are temporary and voluntary.

Zoning: The City of College Station's policies and guidelines for single-family and multifamily housing are discussed in the Comprehensive Plan and the Unified Development Ordinance (UDO), and also in other ordinances passed by the City Council. A review of the City's policies and guidelines did not reveal any impediments to fair housing choice for any protected class.

- Group home issues: Group homes are allowable within R-4 and R-6 zoning districts.
- Familial status: Currently, the limit of unrelated occupants in a residential dwelling is set at four persons by the definition of family adopted in the Unified Development Ordinance, which reads, "Family: A family is one or more persons occupying a single dwelling unit, provided that unless all members are related by (1) blood, (2) adoption, (3) guardianship, (4) marriage, or (5) are part of a group home for disabled persons, no such family shall contain more than four persons." Per Ordinance No. 2753 dated September 23, 2004
- Public housing: There are no public housing units in the City of College Station.
- Homeless persons: The homeless are served at the Twin City Mission emergency shelter located in the City of Bryan. A 24-unit homeless transitional housing facility is located at the Haven in College Station. No ordinance other than those relating to securing unsafe structures address homelessness or vagrancy.

Private Sector Impediments

Advertising policies and practices: 42 U.S. Code § 3604 (c) codifies that it shall be unlawful to "make, print, or publish, or cause to be made, printed, or published any notice, statement, or advertisement, with respect to the sale or rental of a dwelling that indicates any preference, limitation, or discrimination based on membership in a protected class, or an intention to make any such preference, limitation, or discrimination". The City of College Station Community Development Staff reviewed six months of real estate sale and rental advertisements published in the local newspaper of record, Three weeks' worth of advertising in the Bryan/College Station *Eagle* from May, 2010, was examined to ascertain that prohibited terminology was not used, that no preferences concerning protected classes were evident, and that models were of diverse groups. The real estate classified section properly contains an equal housing opportunity notice, and no overtly discriminatory advertisements or use of prohibited terms was found. Based on these findings, there are judged to be no impediments to fair housing with regard to newspaper advertising in College Station.

Radio and television advertising were also monitored during this period, though there were comparatively few ads. Cox Cable channel 11 is exclusively devoted to ads for home sales. These were reviewed, and the narratives and photos were found to be non-discriminatory. A review of advertisements in the 2010 Brazos Valley phone book turned up no examples of discriminatory language or imagery.

Homeowners Insurance: No studies have indicated impediments to fair housing existing in the College Station homeowners' insurance market.

- Advertising: A review of the homeowners' insurers advertising in the local yellow pages uncovered no discriminatory practices. The yellow pages are the predominant advertising medium for insurance companies in the area.
- Affirmative marketing: Ads generally have no pictures, other than some with agents' photos, and some have equal housing opportunity logos and also advertise services in Spanish. When models do appear in advertising, they tend to be of a variety of racial backgrounds.
- Location of Agents/Offices: There are hundreds of agents and offices offering insurance services in College Station, according to the yellow pages listings. Review of the business locations show that they are distributed primarily along major thoroughfares, without regard to racial concentrations. Several offices are located nearby neighborhoods of high minority racial concentration.
- Policies: Review indicated no discrimination on the basis of (i) age, (ii) geographic marketing, or (iii) value/replacement cost to values by insurers in College Station.

Rental Housing Policies: Rental housing is of primary concern, as this housing type originates most of the fair housing complaints in College Station.

- Advertising: A review of advertising by rental housing providers indicates no overtly discriminatory practices. However it should be noted that only a very small minority of providers utilize the equal housing opportunity logo in their advertising. Though few models are used, use of human models of minority races is sparse. Also omitted from advertising are any references to units available for handicapped residents, or use of the Spanish language. A number of newspaper ads indicate "No HUD". Most apartment and property management websites do display the equal housing logo, although it is interesting to note that the local Bryan/College Station Apartment Association does not.
- Steering based on protected class status: There is no indication of steering based upon protected class status in the rental housing market in College Station.
- Affirmative Marketing Programs: Since its completion in 2005, Terrace Pines, a local Housing Tax Credit Development, has conducted an affirmative marketing program.

Sales of Existing Housing

- Steering based on protected class status: There is no evidence of steering the sales market. The local Bryan/College Station Regional Association of Realtors conducts regular training programs regarding non-discrimination.
- Advertising: A review of advertising by housing providers indicates no overtly discriminatory practices. Many Realty companies display the equal housing logo on their printed advertisements, and almost all display the logo on their websites. Most photographs and pictures in printed material show models of all races.
- Affirmative Marketing Programs/Voluntary Affirmative Marketing Agreements (VAMA): VAMAs are required for federally insured or assisted housing units. However there is not a centralized, accessible database to determine if any have been submitted to HUD.

Lending: No complaints regarding fair lending practices have been filed since 2005.

- Advertising: A review of the mortgage lenders advertising in the yellow pages indicated no discriminatory practices.
- Affirmative marketing programs: Ads generally have no pictures, other than staff photos. Very few paper ads included equal housing opportunity logos or text indicating that they are fair housing lenders. Many lenders advertise their services in both English and Spanish.
- Location of Branches/Offices: Review of lending business locations show that many are national and statewide institutions. Local lenders are distributed primarily along major thoroughfares, without regard to demographic concentrations. Several lenders are located nearby neighborhoods of high minority concentration.
- Evaluation and Analysis of Home Mortgage Disclosure Act (HMDA) Data: HMDA data is reported for the combined Bryan/College Station M.S.A. Separate College Station-only data is not available.

Figure 24: B/CS Conventional Loan Denials by Characteristic Compared to Percentage in Brazos County Population

Characteristic	% of Denials	% in Population
Whites	72.8%	75.2%
Blacks	6.3%	10.2%
Hispanics	10.8%	20.7%

Source: 2008 FFIEC HMDA Data

Of the 397 conventional loan denials reported in 2008, the data above indicate that Whites, Blacks, and Hispanics were denied conventional loans at rates lower than their overall percentages in the population of Brazos County.

Figure 25: B/CS Conventional Loan Denials by Characteristic

	Total Number of Loan Applications	Total Number of Loan Applications Denied	% Denied
American Indian/Alaska Native	11	8	72.7%
Asian/Pacific Islander	154	20	13.0%
Black	82	25	30.5%
White	2,296	289	12.6%
Hispanic	201	43	21.4%
<50% of MSA Median	161	45	28.0%
50-79% of MSA Median	370	92	24.9%
80-99% of MSA Median	242	37	15.3%
100-119% of MSA Median	238	33	13.9%
120%+ of MSA Median	1,838	187	10.2%
TOTAL	2,891	397	13.7%

Source: 2008 FFIEC HMDA Data

Within different demographic groups, the rates of loan application denials vary widely. When applying for a conventional loan, the overall denial rate was 13.7%. However, 21.4% of applications from Hispanics, 30.5% of applications from Blacks, and a whopping 72.7% of applications from American Indian/Alaska Natives were denied. When looking at denial rates for different income brackets, only applicants who made

more than 120% of the M.S.A Median Income had a denial rate lower than the overall average. These numbers indicate that minority and low- to moderate-income applicants see their loan applications denied at a higher rate than do White and/or high-income applicants.

Figure 26: B/CS MSA FHA, VA & FSA/RHS Loan Denials by Characteristic Compared to Percentage in Brazos County Population		
Characteristic	% of Denials	% in Population
Whites	70.3%	75.2%
Blacks	7.8%	10.2%
Hispanics	12.5%	20.7%
Source: 2008 FFIEC HMDA Data		

Of the 64 insured loan denials reported in 2008, the data above indicate that, as with conventional loans, Whites, Blacks, and Hispanics were denied insured FHA, VA, and FSA/RHS loans at rates lower than their overall percentages in the population of Brazos County. The small sample size for this type of denial (N=64) should be kept in mind when interpreting this data.

Figure 27: B/CS MSA FHA, VA & FSA/RHS Loan Denials by Characteristic			
	Total Number of Loan Applications	Total Number of Loan Applications Denied	% Denied
American Indian/Alaska Native	2	0	0%
Asian/Pacific Islander	13	1	7.7%
Black	50	5	10.0%
White	714	45	6.3%
Hispanic	114	8	7.0%
<50% of MSA Median	58	10	17.2%
50-79% of MSA Median	176	17	9.7%
80-99% of MSA Median	142	8	5.6%
100-119% of MSA Median	117	4	3.4%
120%+ of MSA Median	388	23	5.9%
TOTAL	895	64	7.2%
Source: 2008 FFIEC HMDA Data			

Rates denials for FHA, VA, and FSA/RHS loans tell a story similar to the denial rates for conventional loans. Some minority (Asian/Pacific Islanders and Blacks) and low-income applicants experience loan application denials at rates well above the average for the total sample. Once again, White and high-income applicants have a low proportion of loan application denials.

Figure 28: B/CS MSA Refinance Loan Denials by Characteristic Compared to Percentage in Brazos County Population		
Characteristic	% of Denials	% in Population
Whites	67.6%	75.2%
Blacks	13.4%	10.2%
Hispanics	15.1%	20.7%
Source: 2008 FFIEC HMDA Data		

Of the 544 refinance loan denials in 2008, the data above indicate that Whites and Hispanics were denied refinance loans at rates lower than their overall percentages in the population of Brazos County. However, Blacks were denied conventional loans at a rate about 3% higher than their overall population percentage.

Figure 29: B/CS MSA Refinance Loan Denials by Characteristic

	Total Number of Loan Applications	Total Number of Loan Applications Denied	% Denied
American Indian/Alaska Native	8	3	37.5%
Asian/Pacific Islander	40	10	25.0%
Black	142	73	51.4%
White	1,416	368	26.0%
Hispanic	202	82	40.5%
<50% of MSA Median	103	54	52.4%
50-79% of MSA Median	253	98	38.7%
80-99% of MSA Median	213	80	37.6%
100-119% of MSA Median	195	69	35.4%
120%+ of MSA Median	1,060	234	22.1%
TOTAL	1,910	544	28.5%
Source: 2008 FFIEC HMDA Data			

Applications for refinanced loans also reveal stark differences in denial rates between demographic groups. Over the total sample set, 28.5% of refinancing applications were denied. However, denial rates were much higher for American Indian/Alaska Natives (37.5%), Blacks (51.4%), Hispanics (40.5%), and all those who earn less than 120% of the MSA Median Income.

In summary, the HMDA data indicate that loan denial rates can vary widely by demographic group. It is difficult to determine whether this variation is due to outright discrimination on the part of lenders, or a lack of financial knowledge and know-how among minority and low-income populations.

Affordable Housing Needs Survey

Information regarding local housing needs was gathered from a survey of local realtors in April, 2010 by the City of College Station Community Development Department. Survey respondents ranked affordable single-family homes as the number-one housing need in the College Station market. Down-payment assistance and increased housing for senior citizens rounded out the top three. Coming in last was security deposit assistance. Other needs that were mentioned in the comments section of the survey were: single-family rental units for large families; affordable flood insurance; and improved communication about available down-payment assistance programs.

The complete survey results, ranked by level of importance, were:

1. Affordable single-family homes
2. Down-payment assistance
3. Senior housing
4. Home repair/rehabilitation
5. Special needs housing
6. Affordable rental units
7. Rental assistance programs
8. Emergency/homeless shelters

Impediments to Affordable Housing: Survey respondents were also asked about impediments to increasing the stock of affordable housing. High land costs were ranked as the most severe impediment to affordable housing in College Station. This was closely followed by development costs and financing costs/availability. Rounding out the bottom of the list was a lack of participating builders and demand from the student market. High fees for parkland dedication came up repeatedly in the comments section as yet another obstacle faced by local builders and developers.

Complete survey results, ranked by level of importance, were:

1. Land costs
2. Development Costs
3. Financing costs and availability
4. Land availability
5. Subdivision requirements
6. Permitting process
7. Local income levels
8. Infrastructure availability
9. Credit report requirements
10. Lack of state and/or federal funds
11. Lack of participating builders
12. Student market demand

This survey concluded that the greatest barrier to affordable housing in College Station was the high cost of land for development. The market for developable land in College Station is highly competitive. It can be concluded that increasing land prices are the result of high demand brought about by prudent and effective local government efforts to institute reasonable and necessary zoning and land use controls, providing excellent and timely expansion and maintenance of public infrastructure, while keeping property tax rates as low as possible.

Summary of Potential Impediments

- Since advertising imagery is so common, it is likely that some instances of discrimination in advertising will occur. Housing providers should be encouraged through public outreach to display fair housing logos on their advertising and marketing materials and to use diverse human models in photos and pictures.
- Another potential discriminatory practice may be the development of a trend toward reducing the number of occupants allowed in single family dwellings, either through political support for future modification of the Unified Development Ordinance, or by creation of neighborhood overlay districts which would have the same effect. There has been much discussion by citizens and neighborhood associations of reducing the number of unrelated occupants to two in order to reduce neighborhood difficulties with traffic and noise in student residents.
- The current occupancy limit imposed by the constitution of the State of Texas is found in the Texas Property code, and generally allows adult occupants to number three times the number of bedrooms in the unit. Occupancy limits have also been addressed by the Federal Fair Housing Act of 1968 and corresponding legislative history. Despite its broad goal of eradicating discrimination in housing based on familial status, Congress also recognized the legitimate interests local and state governments have in enacting non-discriminatory occupancy restrictions. It is possible that further limitations on occupancy in single family dwellings within the City or within neighborhoods may engender debate over whether occupancy limits are reasonable or discriminate against families.

8.0 Recommendations and Conclusion

This analysis of impediments to fair housing choice in the City of College Station brought to light a number of areas of concern:

- Rising numbers of fair housing complaints indicate that fair housing public education outreach and efforts have been successful; citizens know their rights and are successfully able to register their complaints for arbitration. However, the steady number of complaints also point out that some residents of College Station continue to face obstacles, whether real or perceived, in their pursuit of fair housing.
- Most dilapidated housing is located in low to moderate income areas which are also areas of minority concentration.
- A review of advertising indicates that local housing providers, lenders, and insurers need to be more diligent to include fair housing logos and diverse human models, as well as bilingual advertising.
- Review of the most recent home mortgage loan data (HMDA) from 2008 indicated that minority and low- to moderate-income applicants see their loan applications denied at higher rates than do White and/or high-income applicants.
- Most of the fair housing complaints registered in College Station relate to the denial of rental housing.
- Rather than constructing concentrated affordable housing, the City promotes scattered site, low-density low-moderate income housing in the belief that this approach helps limit concentrated areas of poverty in the City.
- Current limits on the numbers of occupants in a single family dwelling meet the test of reasonableness under the Fair Housing Act. However, the City must be careful that any further reductions in the number of occupants allowed are not unreasonable.
- Advertisements for home sales and rentals frequently contain a "No HUD" stipulation, leaving voucher recipients with fewer housing choices.

Given these concerns and potential barriers to fair housing in College Station, the following actions are recommended:

- Continue and increase fair housing educational and outreach activities to ensure a greater distribution of bilingual materials on the Internet, in the public library, and on public service radio and television.
- Continue rehabilitation and reconstruction programs, targeting clusters of dilapidated housing in low-mod minority areas.

- Work with local lenders, insurers, and housing providers to ensure non-discrimination in advertising and in providing housing and housing services.
- Continue to support and partner with private Housing Tax Credit developers to construct new, safe, decent, affordable, and sustainable rental housing, particularly for the low-income elderly.
- Carefully review any future requests to reduce the allowable number of occupants in a single-family dwelling to ensure that the test of reasonableness under the Fair Housing Act is met.
- Continue to require developers of properties containing five or more HOME-assisted units to prepare and submit an Affirmative Fair Housing Marketing Plan adopted from HUD Form 935.2. This plan ensures affirmative marketing of affordable units.
- Work to educate the public about the Section 8 Housing Voucher Program in an attempt to decrease the number of residents who refuse to lend or sell housing to HUD-sponsored buyers.
- Educate private lenders about the need for equity in the approval of home loan applications. At the same time, the City will work with minority and low-income applicants to help them put together high-quality loan applications and understand the importance of good credit and sound financial practices.

10.0 Appendix

AGGREGATE TABLE 4-1: DISPOSITION OF APPLICATIONS FOR FHA, FSA/RHS, AND VA HOME-PURCHASE LOANS, 1 TO 4 FAMILY AND MANUFACTURED HOME DWELLINGS BY RACE, ETHNICITY, GENDER AND INCOME OF APPLICANT, 2008

MSA/MD:17780 – College Station-Bryan, TX

Number of Loans

Race, Gender & Income 4.13	Apps. Received 14	Loans Originated	Apps. Approved But Not Accepted	Apps. Denied	Apps. Withdrawn	Files Closed as Incomplete
RACE OF APPLICANT						
AMERICAN INDIAN/ALASKAN NATIVE (TOTAL)	2	2	0	0	0	0
<i>MALE</i>	1	1	0	0	0	0
<i>FEMALE</i>	0	0	0	0	0	0
<i>JOINT (MALE/FEMALE) ²</i>	1	1	0	0	0	0
ASIAN/PACIFIC ISLANDER (TOTAL)	13	12	0	1	0	0
<i>MALE</i>	5	4	0	1	0	0
<i>FEMALE</i>	1	1	0	0	0	0
<i>JOINT (MALE/FEMALE) ²</i>	7	7	0	0	0	0
BLACK (TOTAL)	50	39	2	5	3	1
<i>MALE</i>	14	11	0	2	0	1
<i>FEMALE</i>	18	13	1	2	2	0
<i>JOINT (MALE/FEMALE) ²</i>	18	15	1	1	1	0
HISPANIC (TOTAL)	114	95	4	8	6	1
<i>MALE</i>	55	40	4	6	5	0
<i>FEMALE</i>	13	12	0	1	0	0
<i>JOINT (MALE/FEMALE) ²</i>	45	42	0	1	1	1
WHITE (TOTAL)	714	608	14	45	40	7
<i>MALE</i>	223	187	7	17	11	1
<i>FEMALE</i>	119	102	3	8	4	2
<i>JOINT (MALE/FEMALE) ²</i>	370	317	4	20	25	4
JOINT (WHITE/MINORITY) ⁵ (TOTAL)	16	11	2	0	3	0
<i>MALE</i>	0	0	0	0	0	0
<i>FEMALE</i>	2	2	0	0	0	0
<i>JOINT (MALE/FEMALE) ²</i>	14	9	2	0	3	0
RACE NOT AVAILABLE ⁴ (TOTAL)	100	67	1	13	17	2
<i>MALE</i>	23	14	0	3	6	0
<i>FEMALE</i>	3	2	1	0	0	0
<i>JOINT (MALE/FEMALE) ²</i>	21	14	0	2	4	1
INCOME OF APPLICANTS ⁸						
LESS THAN 50% OF MSA MEDIAN	58	34	4	10	10	0
50-79% OF MSA MEDIAN	176	139	1	17	19	0
80-99% OF MSA MEDIAN	142	123	1	8	8	2
100-119% OF MSA MEDIAN	117	104	3	4	6	0
120% OR MORE OF MSA MEDIAN	388	331	9	23	19	6
INCOME NOT AVAILABLE ⁴	14	8	1	2	1	2
TOTAL	895	739	19	64	63	10

**AGGREGATE TABLE 4-2: DISPOSITION OF APPLICATIONS FOR CONVENTIONAL HOME-PURCHASE
LOANS, 1 TO 4 FAMILY AND MANUFACTURED HOME DWELLINGS, BY RACE, ETHNICITY, GENDER AND
INCOME OF APPLICANT, 2008**

MSA/MD 17780 – College Station-Bryan, TX

Number of Loans

Race, Gender & Income ⁴ ₁₃	Apps. Received ¹⁴	Loans Originated	Apps. Approved But Not Accepted	Apps. Denied	Apps. Withdrawn	Files Closed as Incomplete
RACE OF APPLICANT						
AMERICAN IND/ALASKAN NATIVE (TOTAL)	11	3	0	8	0	0
MALE	5	1	0	4	0	0
FEMALE	1	0	0	1	0	0
JOINT (MALE/FEMALE)	5	2	0	3	0	0
ASIAN/PACIFIC ISLANDER (TOTAL)	154	105	8	20	15	6
MALE	64	45	5	6	5	3
FEMALE	36	21	0	9	4	2
JOINT (MALE/FEMALE)	54	39	3	5	6	1
BLACK (TOTAL)	82	37	16	25	3	1
MALE	30	13	7	7	2	1
FEMALE	24	13	3	7	1	0
JOINT (MALE/FEMALE)	28	11	6	11	0	0
HISPANIC (TOTAL)	201	121	12	43	17	8
MALE	87	47	5	20	10	5
FEMALE	45	29	2	11	2	1
JOINT (MALE/FEMALE)	69	45	5	12	5	2
WHITE (TOTAL)	2296	1653	160	289	162	32
MALE	735	511	58	98	57	11
FEMALE	355	236	21	63	28	7
JOINT (MALE/FEMALE)	1204	906	81	127	76	14
JOINT (WHITE/MINORITY) ⁵ (TOTAL)	35	26	2	7	0	0
MALE	1	1	0	0	0	0
FEMALE	0	0	0	0	0	0
JOINT (MALE/FEMALE)	34	25	2	7	0	0
RACE NOT AVAILABLE (TOTAL)	309	202	33	48	23	3
MALE	45	26	4	8	5	2
FEMALE	20	12	1	5	2	0
JOINT (MALE/FEMALE)	34	25	2	7	0	0
INCOME OF APPLICANTS						
LESS THAN 50% OF MSA MEDIAN	161	86	16	45	11	3
50-79% OF MSA MEDIAN	370	218	27	92	25	8
80-99% OF MSA MEDIAN	242	160	26	37	14	5
100-119% OF MSA MEDIAN	238	169	15	33	20	1
120% OR MORE OF MSA MEDIAN	1838	1360	135	187	131	25
INCOME NOT AVAILABLE	42	37	0	3	2	0
TOTAL	2,891	2,030	219	397	203	42

AGGREGATE TABLE 8-1: REASONS FOR DENIAL OF APPLICATIONS FOR FHA, FSA/RHS, AND VA HOME-PURCHASE LOANS, 1 TO 4 FAMILY AND MANUFACTURED HOME DWELLINGS, BY RACE, ETHNICITY, GENDER AND INCOME OF APPLICANT, 2008

MSA/MD:17780 – College Station-Bryan, TX

Applicant Characteristics	Debt-to- Income Ratio		Employment History		Credit History		Collateral		Insufficient Cash	
	Number	%	Number	%	Number	%	Number	%	Number	%
RACE ⁴										
AMERICAN IND/ALASKAN NATIVE	-	-	-	-	-	-	-	-	-	-
ASIAN/PACIFIC ISLANDER	-	-	-	-	-	-	-	-	-	-
BLACK	3	33	1	11	2	22	0	0	1	11
HISPANIC	2	29	-	-	1	14	3	43	-	-
WHITE	9	22	3	7	11	27	8	20	-	-
2 OR MORE MINORITY RACES	-	-	-	-	-	-	-	-	-	-
JOINT (WHITE/MINORITY)	-	-	-	-	-	-	-	-	-	-
RACE NOT AVAILABLE ⁶	4	29	1	7	3	21	1	7	-	-
GENDER										
MALE	3	15	2	10	4	20	5	25	-	-
FEMALE	4	36	-	-	3	27	1	9	-	-
JOINT (MALE/FEMALE) ²	6	25	2	8	6	25	5	21	1	4
GENDER NOT AVAILABLE	3	33	1	11	3	33	-	-	1	11
INCOME										
LESS THAN 50% OF MSA MEDIAN	4	33	1	8	3	25	1	8	1	8
50-79% OF MSA MEDIAN	5	26	1	5	5	26	4	21	1	5
80-99% OF MSA MEDIAN	2	25	1	13	2	25	-	-	-	-
100-119% OF MSA MEDIAN	-	-	-	-	-	-	2	67	-	-
120% OR MORE OF MSA MEDIAN	4	21	2	11	6	32	2	11	-	-
INCOME NOT AVAILABLE	1	33	-	-	-	-	-	-	-	-

AGGREGATE TABLE 8-1: REASONS FOR DENIAL OF APPLICATIONS FOR FHA, FSA/RHS, AND VA HOME-PURCHASE LOANS, 1 TO 4 FAMILY AND MANUFACTURED HOME DWELLINGS, BY RACE, ETHNICITY, GENDER AND INCOME OF APPLICANT, 2008

MSA/MD:17780 – College Station-Bryan, TX

2 OF 2

Applicant Characteristics	Unverifiable Information		Credit Appl. Incomplete		Mortgage Insurance Denied		Other		Total	
	Number	%	Number	%	Number	%	Number	%	Number	%
RACE										
AMERICAN IND/ALASKAN NATIVE	-	-	-	-	-	-	-	-	-	-
ASIAN/PACIFIC ISLANDER	-	-	-	-	-	-	-	-	-	-
BLACK	-	-	1	11	-	-	1	11	9	100
HISPANIC	1	14	-	-	-	-	-	-	7	100
WHITE	3	7	3	7	-	-	4	10	41	100
JOINT (WHITE/MINORITY)	-	-	-	-	-	-	-	-	-	-
RACE NOT AVAILABLE	-	-	1	7	-	-	1	7	14	100
GENDER										
MALE	2	10	1	5	-	-	3	15	20	100
FEMALE	-	-	1	9	-	-	2	18	11	100
JOINT (MALE/FEMALE)	1	4	2	8	-	-	1	4	24	100
GENDER NOT AVAILABLE	-	-	1	11	-	-	-	-	9	100
INCOME										
LESS THAN 50% OF MSA MEDIAN	1	8	1	8	-	-	-	-	12	100
50-79% OF MSA MEDIAN	-	-	-	-	-	-	3	16	19	100
80-99% OF MSA MEDIAN	-	-	-	-	-	-	1	13	8	100
100-119% OF MSA MEDIAN	-	-	1	33	-	-	-	-	3	100
120% OR MORE OF MSA MEDIAN	2	11	3	16	-	-	-	-	19	100
INCOME NOT AVAILABLE b	-	-	-	-	-	-	2	67	3	100

AGGREGATE TABLE 8-2: REASONS FOR DENIAL OF APPLICATIONS FOR CONVENTIONAL HOME-PURCHASE LOANS, 1 TO 4 FAMILY AND MANUFACTURED HOME DWELLINGS, BY RACE, ETHNICITY, GENDER AND INCOME OF APPLICANT, 2008

MSA:17780-College Station - Bryan, TX

1 OF 2

Applicant Characteristics	Debt-to- Income Ratio		Employment History		Credit History		Collateral		Insufficient Cash	
	Number	%	Number	%	Number	%	Number	%	Number	%
RACE 4										
AMERICAN IND/ALASKAN NATIVE	1	14	-	-	4	57	-	-	-	-
ASIAN/PACIFIC ISLANDER	4	31	-	-	4	31	1	8	-	-
BLACK	3	13	1	4	16	70	-	-	2	9
HISPANIC	7	16	1	2	21	49	5	12	2	5
WHITE	36	13	8	3	97	34	48	17	27	9
JOINT (WHITE/MINORITY) 5	-	-	-	-	2	40	2	40	-	-
RACE NOT AVAILABLE 6	9	22	3	7	5	12	4	10	2	5
GENDER										
MALE	9	8	3	3	35	31	21	19	10	9
FEMALE	16	20	-	-	33	42	7	9	6	8
JOINT (MALE/FEMALE) 7	24	15	6	4	56	34	24	15	15	9
GENDER NOT AVAILABLE 6	4	19	3	14	4	19	3	14	-	-
INCOME 8										
LESS THAN 50% OF MSA MEDIAN	7	18	2	5	20	53	3	8	2	5
50-79% OF MSA MEDIAN	10	11	4	5	41	47	7	8	13	15
80-99% OF MSA MEDIAN	4	11	1	3	12	34	4	11	3	9
100-119% OF MSA MEDIAN	7	18	1	3	16	40	5	13	4	10
120% OR MORE OF MSA MEDIAN	24	14	4	2	39	22	36	21	9	5
INCOME NOT AVAILABLE 6	1	33	-	-	-	-	-	-	-	-

AGGREGATE TABLE 8-2: REASONS FOR DENIAL OF APPLICATIONS FOR CONVENTIONAL HOME-PURCHASE LOANS, 1 TO 4 FAMILY AND MANUFACTURED HOME DWELLINGS, BY RACE, ETHNICITY, GENDER AND INCOME OF APPLICANT, 2008

MSA:17780-College Station - Bryan, TX

2 OF 2

Applicant Characteristics	Unverifiable Information		Credit Appl. Incomplete		Mortgage Insurance Denied		Other		Total ¹⁶	
	Number	%	Number	%	Number	%	Number	%	Number	%
RACE ⁴										
AMERICAN IND/ALASKAN NATIVE	-	-	-	-	-	-	2	29	7	100
ASIAN/PACIFIC ISLANDER	-	-	2	15	-	-	2	15	13	100
BLACK	-	-	1	4	-	-	-	-	23	100
HISPANIC	1	2	1	2	-	-	5	12	43	100
WHITE	13	5	17	6	1	0	41	14	288	100
JOINT (WHITE/MINORITY) ⁵	-	-	-	-	-	-	1	20	5	100
RACE NOT AVAILABLE ⁶	4	10	5	12	-	-	9	22	41	100
GENDER										
MALE	6	5	7	6	1	1	20	18	112	100
FEMALE	3	4	6	8	-	-	8	10	79	100
JOINT (MALE/FEMALE) ⁷	8	5	9	5	-	-	23	14	165	100
GENDER NOT AVAILABLE ⁶	-	-	3	14	-	-	4	19	21	100
INCOME ⁸										
LESS THAN 50% OF MSA MEDIAN	1	3	3	8	-	-	-	-	38	100
50-79% OF MSA MEDIAN	2	2	3	3	-	-	7	8	87	100
80-99% OF MSA MEDIAN	1	3	4	11	-	-	6	17	35	100
100-119% OF MSA MEDIAN	1	3	2	5	1	3	3	6	40	100
120% OR MORE OF MSA MEDIAN	12	7	11	6	-	-	39	22	174	100
INCOME NOT AVAILABLE ⁶	-	-	2	67	-	-	-	-	3	100

AGGREGATE TABLE 8-3: REASONS FOR DENIAL OF APPLICATIONS TO REFINANCE LOANS ON 1 TO 4 FAMILY AND MANUFACTURED HOME DWELLINGS, BY RACE, ETHNICITY, GENDER AND INCOME OF APPLICANT, 2008

MSA:17780-College Station - Bryan, TX

1 OF 2

Applicant Characteristics	Debt-to- Income Ratio		Employment History		Credit History		Collateral		Insufficient Cash	
	Number	%	Number	%	Number	%	Number	%	Number	%
RACE ⁴										
AMERICAN INDI/ALASKAN NATIVE	-	-	1	33	-	-	-	-	-	-
ASIAN/PACIFIC ISLANDER	4	50	-	-	1	13	-	-	1	13
BLACK	7	23	1	3	14	47	2	7	1	3
HISPANIC	9	20	1	2	16	39	5	11	1	2
WHITE	47	18	1	0	63	25	60	24	7	3
JOINT (WHITE/MINORITY) ⁵	-	-	-	-	-	-	1	50	-	-
RACE NOT AVAILABLE ⁶	13	18	-	-	15	21	14	20	2	3
GENDER										
MALE	24	21	2	2	26	23	13	12	4	4
FEMALE	13	21	-	-	19	31	13	21	1	2
JOINT (MALE/FEMALE) ⁷	15	16	1	1	44	28	44	28	4	3
GENDER NOT AVAILABLE ⁶	9	26	-	-	4	12	8	24	1	3
INCOME ⁸										
LESS THAN 50% OF MSA MEDIAN	15	38	2	5	10	26	3	8	-	-
50-79% OF MSA MEDIAN	16	28	1	2	12	21	10	17	2	3
80-99% OF MSA MEDIAN	8	23	-	-	15	43	5	14	1	3
100-119% OF MSA MEDIAN	10	20	-	-	12	24	10	20	1	2
120% OR MORE OF MSA MEDIAN	21	12	-	-	44	24	50	27	6	3
INCOME NOT AVAILABLE ⁶	1	17	-	-	-	-	-	-	-	-

AGGREGATE TABLE 8-3: REASONS FOR DENIAL OF APPLICATIONS TO REFINANCE LOANS ON 1 TO 4 FAMILY AND MANUFACTURED HOME DWELLINGS, BY RACE, ETHNICITY, GENDER AND INCOME OF APPLICANT, 2008

MSA:17780-College Station - Bryan, TX

2 OF 2

Applicant Characteristics	Unverifiable Information		Credit Appl. Incomplete		Mortgage Insurance Denied		Other		Total ¹⁶	
	Number	%	Number	%	Number	%	Number	%	Number	%
RACE⁴										
AMERICAN IND/ALASKAN NATIVE	1	33	1	33	-	-	-	-	3	100
ASIAN/PACIFIC ISLANDER	1	13	-	-	-	-	1	13	8	100
BLACK	2	7	1	3	2	7	-	-	30	100
HISPANIC	1	2	3	7	-	-	8	17	46	100
WHITE	10	4	21	8	-	-	46	18	255	100
JOINT (WHITE/MINORITY) ⁵	-	-	-	-	-	-	1	50	2	100
RACE NOT AVAILABLE ⁶	5	7	9	13	-	-	13	18	71	100
GENDER										
MALE	9	8	7	6	-	-	28	25	113	100
FEMALE	2	3	6	10	-	-	8	13	62	100
JOINT (MALE/FEMALE) ⁷	5	3	15	9	-	-	22	14	160	100
GENDER NOT AVAILABLE ⁶	3	9	4	12	-	-	5	15	34	100
INCOME⁸										
LESS THAN 50% OF MSA MEDIAN	1	3	5	13	-	-	3	8	39	100
50-79% OF MSA MEDIAN	5	9	3	5	-	-	9	16	58	100
80-99% OF MSA MEDIAN	1	3	-	-	-	-	5	14	35	100
100-119% OF MSA MEDIAN	2	4	4	8	-	-	10	20	49	100
120% OR MORE OF MSA MEDIAN	8	4	19	10	-	-	34	19	182	100
INCOME NOT AVAILABLE ⁶	2	33	1	17	-	-	2	33	6	100