

Analysis of Impediments to Fair Housing: 2015 Update

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

July 31, 2015

(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 2015-2019 Consolidated Plan and updates previous analyses that were completed in 1996, 2005, and 2010. 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 Services, 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 Community Services 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 of the City's 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 2013 indicated that minority and low/moderate income applicants see their loan applications denied at higher rates than 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.
- Some advertisements for rental units contain a "No HUD" stipulation, reducing the housing options for voucher recipients.

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 fair housing 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-moderate income, 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 Choice 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 179,000. 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 100,000 anchored by the presence of Texas A&M University.

Population

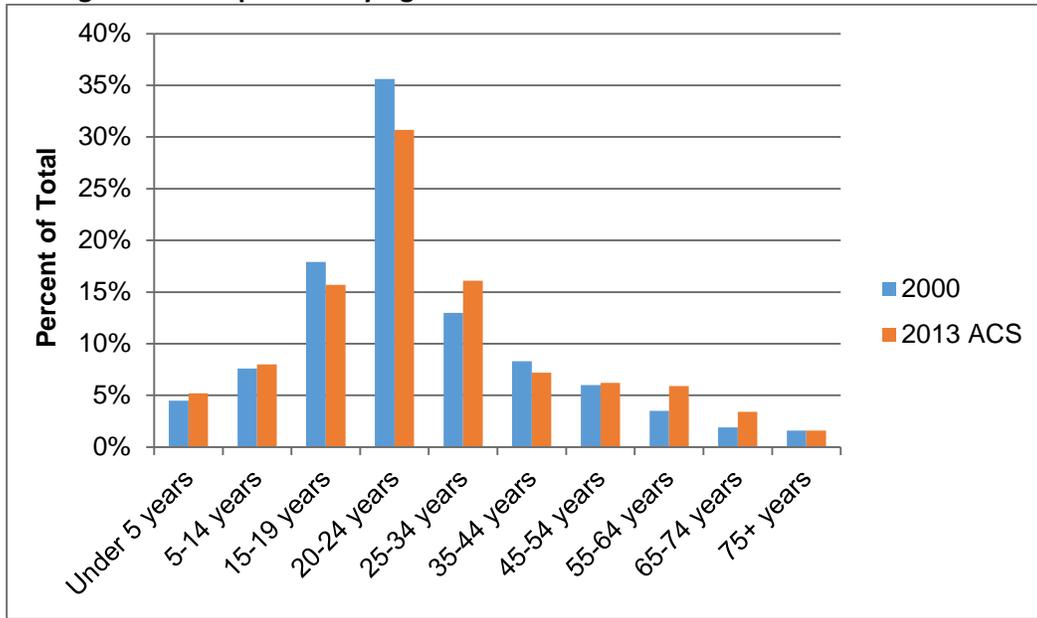
College Station is a youthful, growing city. The local population increased dramatically over the last decade, jumping 38% from 2000-2010 and an estimated 7% just in the last three years. The region around College Station also experienced overall population growth during the last decade.

Year	Population
1990	52,456
2000	67,890
2010	93,857
2013 ACS	100,036
Data: Decennial Census and American Community Survey	

The 2013 ACS reports the location of residence in the previous year for College Station residents, indicating migration into or out of the City. In 2013, College Station welcomed nearly about 17,000 new residents from within the state of Texas and just over 1,700 new residents from abroad. About 2,000 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.

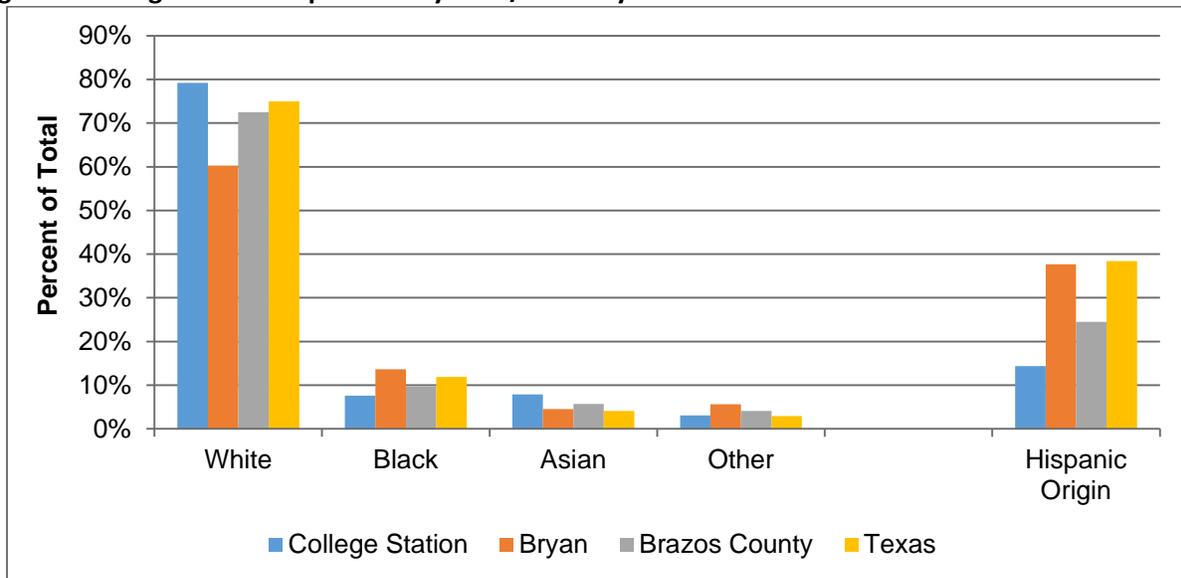
Population by Age: The tens of thousands of students who flock to Texas A&M University have a big impact on the city's demographics: in 2013 the median age in College Station was 22.4, eight years younger than the median age in College Station's sister city, Bryan. The median ages in Texas and the greater United States are over a decade older. Nearly 31% of the population in College Station falls within the ages of 20-24; that number is only 7.4% statewide.

Figure 2: College Station Population by Age



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 2013, persons of Hispanic or Latino origin represented 14.4% of the local population, a number far lower than the rates seen in both the City of Bryan (37.7%) and the State of Texas (38.4%). The number of persons of Black or African American origin is also comparatively low, at 7.6% compared with 13.6% in Bryan and 11.9% in the state at large. However, College Station does have a comparatively high number of residents who claim Asian descent, making up 7.9% of the population. Persons of White or European decent represented 79.2% of College Station residents, about four percentage points higher than the statewide rate.

Figure 3: College Station Population by Race/Ethnicity



Population Projections: College Station’s population projections through 2025 were calculated for the City of College Station through a review of historical U.S. Census Bureau data, including population estimates produced by the Census Bureau from 2011-2014. Based on an average of the percentage change on an annual basis since the Decennial Census in 2010, there is expected to be a 2.5% annual growth rate resulting in a population of 135,779 residents by 2025.

Year	Population	Source
2000	67,890	Decennial Census
2010	93,857	Decennial Census
2015	106,070	Population Projection
2020	120,009	Population Projection
2025	135,779	Population Projection

Source: U.S. Census Bureau

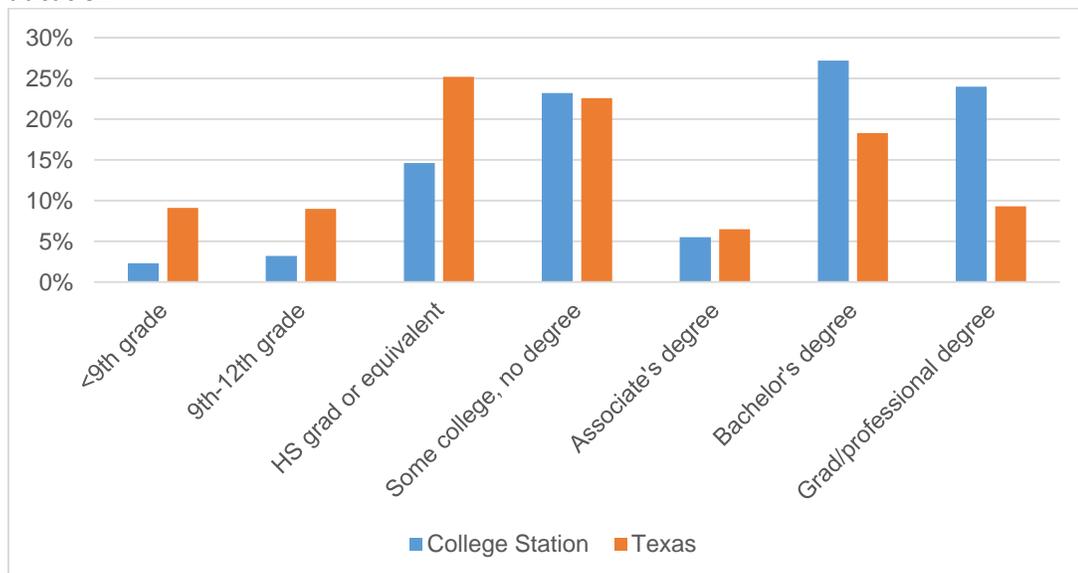
English Proficiency

The vast majority (80.3%) of College Station’s residents speak English at home. Of those who speak a language other than English at home, just 6.6% 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 2013, 51.2% of College Station residents over the age of 25 had completed at least a Bachelor’s degree or higher, which is about double the number who achieved similar levels of education attainment statewide. However, this represented a decrease of 6.7% from the 2010 ACS One-Year Estimate levels. The number of residents who failed to complete high school rose from 4.0% in 2010 to 5.5% in 2013. The statewide number of high-school dropouts stands at 18.1%, more than three times College Station’s rate.

Figure 4: Education



Income

Per capita income levels have risen in College Station, from \$19,934 in 2008 to \$21,094 in 2013. Median family income actually decreased between 2008 and 2013 by about \$1,500, falling to \$66,861 in 2013. A substantial number of College Station residents continue to struggle with poverty. As of 2013, 14.0% of local families were living below the poverty line, down only from 14.5% in 2008.

Employment

In December 2014, there were 108,300 jobs in the Bryan/College Station M.S.A., according to the Texas Workforce Commission's LMCI Economic Profile. Nearly 36% 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 by far the largest employer of College Station residents, with over 12,000 academician and support staff. 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. The unemployment rate in College Station was 3.9% at the end of 2014 according to the Bureau of Labor and Statistics and has continued to be among the lowest unemployment rates in Texas.

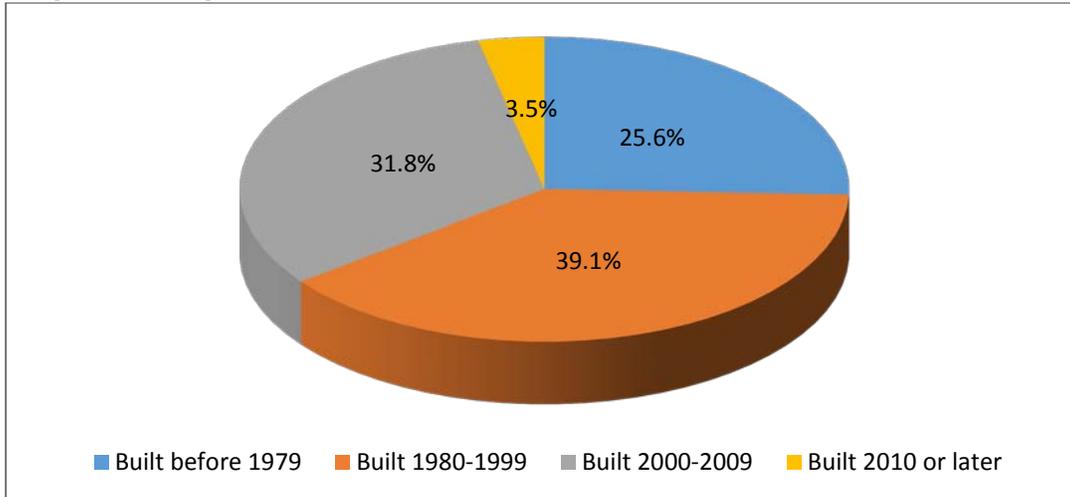
Households

As of 2013, College Station had 100,036 persons (35,021 households) living in 40,615 housing units, with an average household size of 2.55 persons. The average family size was 3.11. The ACS estimated there were 15,898 family households (45.4% of the total) and 19,123 non-family households (54.6% of the total). The number of non-family households is high because of the large student population. There were 2,474 female-headed households as of 2013, with nearly 50% 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

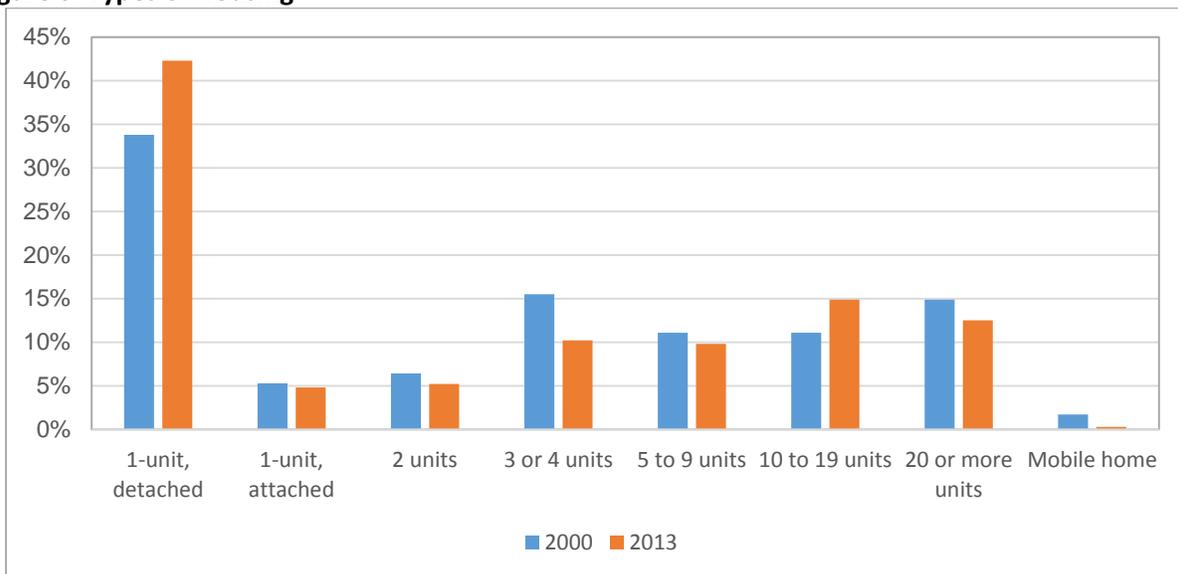
College Station is a relatively new community, evidenced by the fact that about 74% of its housing units were built after 1980, resulting in fewer dilapidated units than are normally seen in similarly sized communities.

Figure 5: Age of Housing



The 2013 American Community Survey indicated that 86.2% of the 40,615 residential units in College Station were occupied. Fifty three 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 3.04 in 2008 to 3.11 in 2013.

Figure 6: Types of Housing



In 2013, the median home value for owner-occupied homes was \$174,900. The average home sold in 2004 went for \$155,947; by 2009, the average home sale price rose to \$190,240. In 2014, the average home sold for \$206,089 – an increase of 32% over ten years.

Rent Profile

Sixty seven percent of all home dwellings in the City of College Station are rented (2013 American Community Survey), so multifamily housing cost and affordability is of particular importance to the local community. The 2013 ACS indicates that 70.9% 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. Shown in Figure 8, the average multi-family rents in College Station are below the 2015 HUD Fair Market Rents (FMR's) in all housing categories; the greatest difference being 17% for the 3 bedroom units. 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, displayed in Figure 9, indicates that multi-family monthly rental rates have decreased slightly for 1 bedroom and 2 bedroom units at 1.02% and 0.75% respectively. For all other unit types the average annual rent has increased ranging from 2.44% to 8.48% 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.

	Efficiency	1 BR	2 BR	3 BR	4 BR
Average College Station market rent	\$588	\$684	\$796	\$992	\$1,314
FY 2015 HUD FMR	\$647	\$651	\$803	\$1,161	\$1,392
\$ Difference	-\$59	\$33	-\$7	-\$169	-\$78
% Difference	-10.0%	4.8%	-0.9%	-17.0%	-5.9%
Data: Texas A&M Real Estate Center; HUD					

FMR Year	Efficiency	1 BR	2 BR	3 BR	4 BR
FY 2011	\$610	\$690	\$843	\$1,068	\$1,101
FY 2012	\$538	\$609	\$743	\$941	\$970
FY 2013	\$674	\$679	\$837	\$1,210	\$1,451
FY 2014	\$699	\$704	\$868	\$1,255	\$1,505
FY 2015	\$647	\$651	\$803	\$1,161	\$1,392
Average Annual Increase	2.44%	-1.02%	-0.75%	3.23%	8.48%
Data: HUD					

The median rent in College Station rose from \$724 in 2008 to \$872 in 2013, for an increase of 20.4%. During this time, the area median household income decreased by 7.3% from \$34,462 to \$31,940 as shown in Figure 10. Homeowner households had a median income of \$93,830 in 2013, an 8.8% increase from 2008; median income for renters rose by 11.2% to \$20,679.

Figure 7: Median Household Income by Type of Residence			
Median Household Income	2000	2008 ACS	2013 ACS
Total	\$20,978	\$34,462	\$31,940
Owner Occupied	\$69,371	\$86,254	\$93,830
Renter Occupied	\$13,575	\$18,602	\$20,679
Data: 2000 Census, 2008 and 2013 ACS			

The chart above reveals the vast disparity between the median incomes of renters and owners in College Station. Homeowners earned about four times more income than renters, according to the 2013 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.

Figure 8: Fall 2014 Student Enrollment	
Texas A&M University, Undergraduate and Graduate*	55,810
Blinn College, Bryan Campus	13,587
Total Students Enrolled	69,397
On-Campus Housing (Texas A&M)	-9,860
Local Student Off-Campus Housing Demand	59,537
<i>Source: Texas A&M Office of Institutional Studies and Planning and Blinn College</i>	

*NOTE: In Fall 2013 the TAMU Health Science Center merged as unit within the official Texas A&M University system.

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.

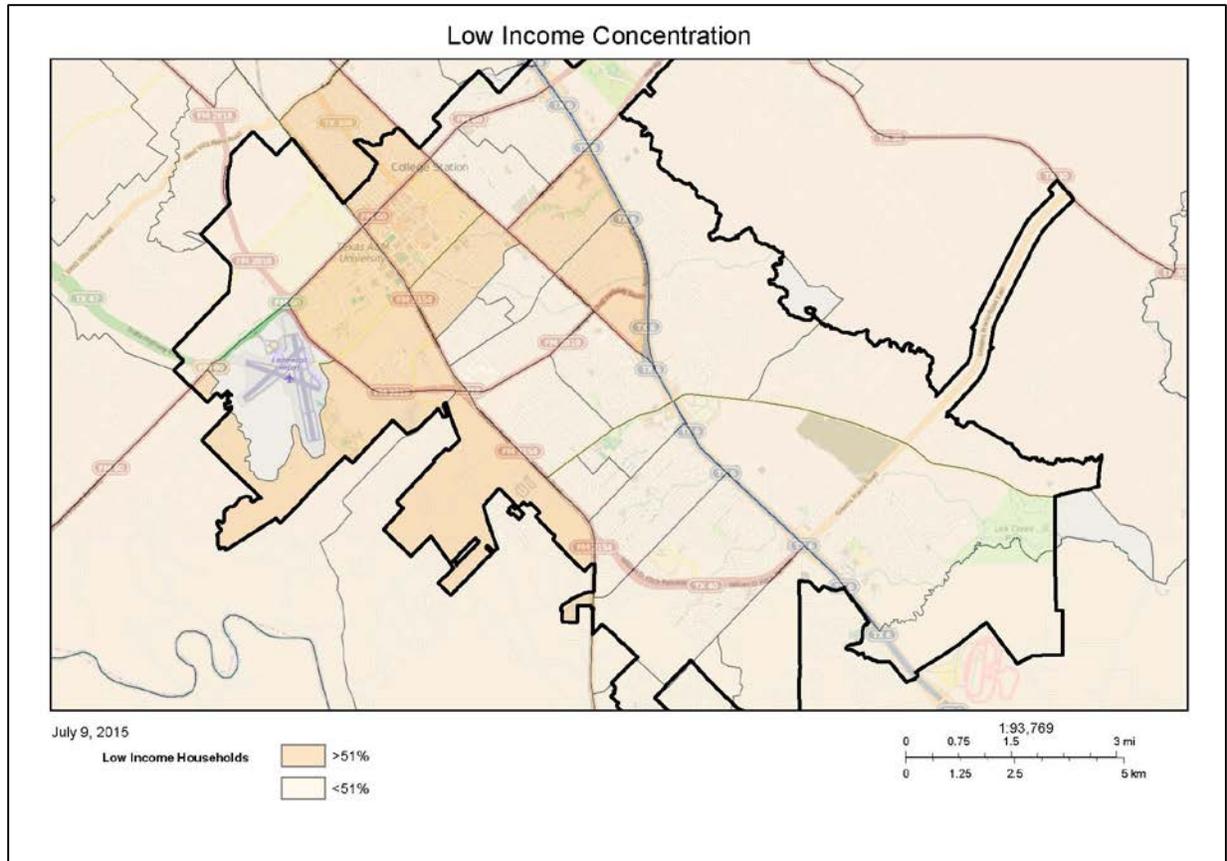
Homeownership Profile

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 \$1,671 per month for households in the City of College Station. The median

home sold in 2014 was priced at \$189,500, 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.

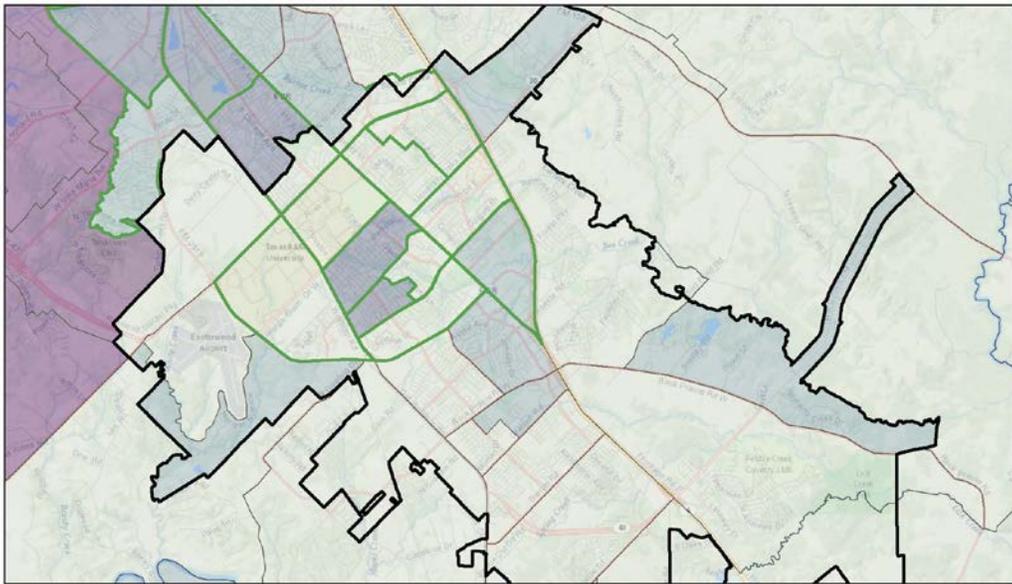
Low- and Moderate-Income Areas and Areas of Minority Concentration

The following map illustrates the low/mod areas of the City by Census Tract; these are areas where 51% or more of the tract population earns less than 80% of the area median income. These areas are located in the original neighborhoods of College Station and center in and around the university campus.



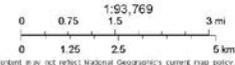
An area with a minority concentration is defined as a census tract with a population of a single minority group exceeding 51% of the total population of the census tract. College Station does not have any such qualifying areas. However, there are areas of minority concentration in the neighboring city of Bryan. The reason for the absence of any concentration in College Station is due to the growing influx of student renters, shifting the demographics in what are the traditional minority areas of the City. The maps below show the concentrations of the Black/African American, Hispanic or Latino, and Asian populations. Low-income Census tracts are outlined in green.

City of College Station - Black / African American Concentration



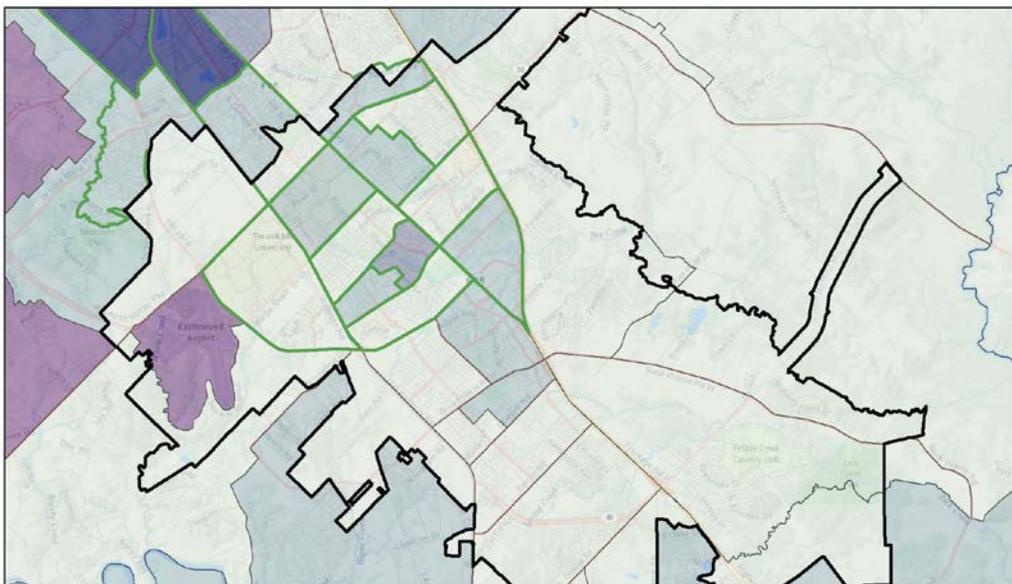
February 11, 2015

Black/African American



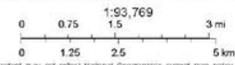
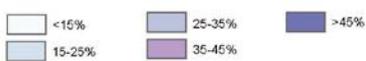
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Content in any not reflect National Geographic's current map policy. Sources: National Geographic, Esri, DeLorme, HERE, UNEP-WCMC, USGS, NASA, ESA, METI, NRCAN, GEBCO, NOAA, iStock/PA Corp.

City of College Station - Hispanic Origin Concentration

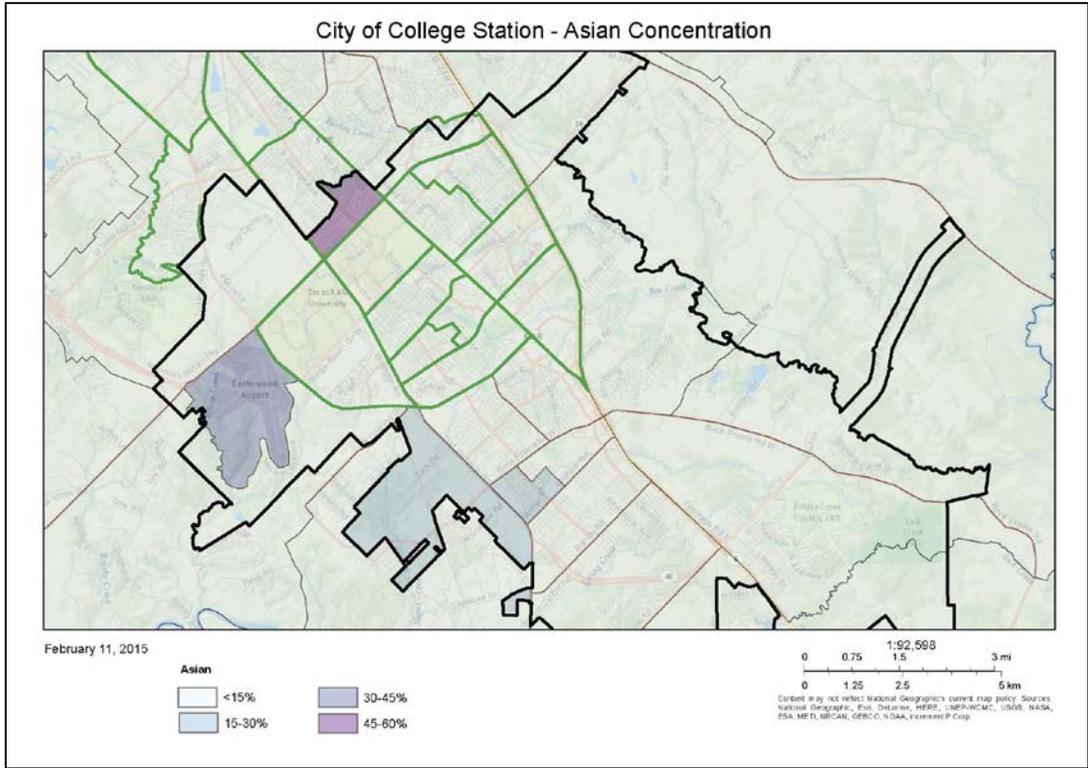


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Hispanic Origin



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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 \$178,500 represents the annual median sales price of homes in College Station in 2014. The average home purchased through the City’s Down Payment Assistance Program in Program Year 2013 was priced at \$103,200, and the \$141,000 figure represents the midpoint between these two prices.

Figure 9: Housing Expenses by Sales Price

	Assumptions Based on Sales Price	Sales Price		
		\$103,200	\$141,000	\$178,500
Principal and Interest with a 3.5% down-payment	Interest Rate of 4.5%	\$520.95	\$711.76	\$901.05
Property Taxes	2.258028 per \$100 valuation	\$182.06	\$255.06	\$327.48
Homeowners Insurance	.5%	\$43.00	\$58.75	\$74.38
Mortgage Insurance	0.85% w/ 1.75% up front	\$73.10	\$99.88	\$126.44
Total Housing Expenses		\$819.10	\$1,125.44	\$1,429.34

Only households with an income of \$57,192 or more could purchase a home costing \$178,500. Homes sold in College Station below the price of \$100,000 made up only 4.8% of the total sales in the City in 2014. 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 2014 in College Station was \$206,088, 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 2014 by price range and computes average sales price, average square footage, days on market, cost per square foot, and total units sold:

Figure 10: 2014 College Station Home Sales Summary						
Sale Price	Avg. Sale Price	Avg. Sq. Ft.	Avg. Days on Mkt	Avg. \$/Sq.Ft.	# of Units	% Total
Under \$50K	\$24,301	1,233	128	\$35.83	2	0.1%
\$50K-\$99,999	\$78,668	1,023	106	\$77.43	76	4.7%
\$100K - \$149,999	\$131,403	1,367	95	\$97.57	330	20.5%
\$150K - \$199,999	\$172,329	1,638	101	\$107.26	607	37.8%
\$200K - \$249,999	\$222,797	1,996	118	\$113.55	243	15.1%
\$250K - \$299,999	\$267,839	2,289	97	\$118.43	131	8.2%
\$300K and over	\$403,504	3,004	113	\$135.12	218	13.6%
Overall Average	\$206,089	1,847	104	\$109.41	1,607	100%
Source: Bryan College Station Regional Association of Realtors® Multiple Listing Service						

The highest proportion of homes sold (37.8%) was in the \$150,000 to \$199,999 price range. The next largest proportion was in the \$100,000 to \$149,999 price range (20.5%).

From 2009 to 2014, the average price of homes sold increased by 8.3%.

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 \$107.26 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 2014 was \$109.41.

The average price per square foot increased 6.2% from 2009 to 2014.

Ad Valorem Property Taxes: A significant contributor to the cost of homeownership is the ad valorem (Property) tax. The Brazos Central 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 (with a reference to tax rates from five years ago):

Figure 11: College Station Property Tax		
Entity	2014 Tax Rate	2010 Tax Rate
City of College Station	\$0.4525	\$0.447543
College Station I.S.D.	\$1.38	\$1.309933
Brazos County	\$0.485	\$0.4856
TOTAL	\$2.3175	\$2.243076

Annual property taxes for the average home sold in the City of College Station in 2014 with an appraised value of \$206,089 (including the \$15,000 homestead exemption for school taxes) would be \$4,569.11. Property taxes for the median-priced home (\$178,500) would be \$3,929.74. Property tax exemptions are available for homeowners through the homestead exemptions and exemptions for the disabled, veterans, and the elderly.

Over the past five years, College Station ISD has raised its tax rate 5.3%. A six-cent jump from 2013 to 2014 coincided with the passage of a bond issue passed in November 2013. 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 for College Station and Brazos County have remained steady – in fact, despite a slight increase in 2013, the 2014 rate for Brazos County is lower or equal to any previous year since 2010.

Homeowners Insurance: Another component of homeownership cost is insurance. A variety of factors contribute to the premium rate, including coverage amount, location, age of the residence, type of construction, and personal credit and claim history. A review of rates through the Texas Department of Insurance in March 2015 indicated that a household with average credit in College Station could expect to pay a premium of \$1,119 on policy with a coverage amount of \$150,000 (based on a random sampling of rates). Overall, the State of Texas has some of the highest insurance rates in the nation.

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

Figure 12: Mortgage Interest Rates				
Lender	15 Yr	Points	30 Yr	Points
Bank of America	3.125%	0.836%	3.75%	0.758%
BB&T Bank	3.125%	0.125%	3.875%	0.125%
Cornerstone Mortgage	3.25%	-	3.75%	-
Prosperity Bank of Bryan	3.625%	-	-	-
Texas Liberty Mortgage	3.375%	0.25%	3.5%	0.25%
City Bank	2.75%	-	3.25%	-
Average	3.21%	0.40%	3.625%	0.38%
Source: February 2015				

Rental Prices: Rents in the Bryan/College Station apartment market are a little lower than the statewide average. The overall occupancy rate, at 97.5%, is higher than the Texas average; occupancy in newer apartments (built since 2010) is even higher at 99.1%.

Figure 13: Bryan/College Station Apartment Market Statistics, October 2014		
	Bryan/College Station	Texas Average
Average rent (\$/sq. ft.)	\$0.86	\$0.97
Average rent for units built since 2010 (\$/sq. ft.)	\$0.95	\$1.19
Average occupancy	97.5%	96.8%
Average occupancy for units built since 2010	99.1%	97.2%
Source: Apartment MarketData Research, Texas A&M University Real Estate Center		

Residential Development Activity

Single family housing starts have increased 31% from 2013 to 2014. The average permit value in 2014 was \$170,292, a slight increase from \$165,294 in 2013. (Note that permit value does not include cost of land). Housing starts in 2014 were 62% higher than in 2010. Value per unit constructed was significantly higher as well, up 22% from the average 2009 single family permit value of \$139,085. This reflects not only rising costs for materials, but also the strong demand for new homes over the past several years.

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 2013 ACS estimated that just 33% of College Station's residences are occupied by homeowners. Thus, 67% of the housing market in College Station is rental property, compared to an average of 38% statewide. New building permits in College Station were issued more frequently for single-family housing units than for multi-family housing units every year since 2010 excluding 2011. (Source: City of College Station Planning and Development Services)

Multifamily construction activity has been volatile since 2010, with a high of 506 new units in 2011 and a low of 149 units in 2014. Per-unit permit values in 2014 were \$79,285 per unit, down 11% from \$88,999 per unit in 2013, and a decrease from a per-unit value of \$85,714 in 2009. (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 2013 rental vacancy rate in College Station was 10%, an increase from an 8% vacancy rate in 2008. This increase may be a sign of overbuilding. The homeowner vacancy rate was 5% in 2013, increasing from 1% in 2008, illustrating the changing housing market. College Station vacancy rates are quite a bit higher than the Texas average, where the homeowner vacancy rate is 2% and the rental vacancy rate is 8%.

Figure 14: Current College Station MLS Single Family Housing Availability – Active Listings				
June 2, 2015 College Station Listings	Avg. List Price	Avg. List Price/Sq.Ft.	# Units	% Total
Under \$50K	-	-	0	0.0%
\$50K-\$99,999	\$88,000	\$91.14	3	1.0%
\$100K - \$149,999	\$133,780	\$101.43	5	1.7%
\$150K - \$199,999	\$179,759	\$124.69	44	15.2%
\$200K - \$249,999	\$227,467	\$125.61	89	30.7%
\$250K - \$299,999	\$277,960	\$128.53	53	18.3%
\$300K and over	\$522,005	\$155.95	96	33.1%
Overall Average	\$323,901	\$135.28	290	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 4.5 Months Inventory based upon the 2014 data. This figure is lower than the previous year and down 55% from a recent high of 9.8 Months Inventory in 2011.

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. Therefore, a notable drop in Months Inventory indicates rising values, which are concurrent with MLS sales data and local appraisal values from the past several years.

Low-Income Housing

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

Figure 15: 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 September 30 2016
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	Project Based Section 8	Low/Mod Income	200 Total Units – all LMI	Contract ends June 30, 2033
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 2027
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 16: 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/recreation, 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
Elder-Aid BCS	Accessible Rental Property	I&R, Case Management, 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	40 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 2345 Manor Dr Bryan	Supportive Housing	Skilled and moderate care	Elderly/Disabled	125 Beds: 44 assisted, 33 secure dementia, 48 skilled
Magnified Nursing and Rehab 1115 Anderson College Station	Supportive Housing	Skilled and moderate care	Elderly/Disabled	142 Beds
Lampstand Health and Rehab 2001 E 29 th Bryan	Assisted Living	Skilled and moderate care	Elderly/Disabled	140 Beds
Fortress Nursing and Rehabilitation 1105 Rock Prairie College Station	Supportive Housing	Skilled and moderate care	Elderly/Disabled	120 Beds
MOSAIC	Group Homes	Case management to facilitate independent living	Persons with developmental disabilities	9 spaces
MHMR Authority of the Brazos Valley – The Family Tree	Residential Facility	Counseling, transportation, employment, I&R	Adults with intellectual disabilities (co-ed facility)	8 beds
MHMR Authority of the 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 –The Horizon	Transitional Housing	Drug abuse counseling mandatory	Homeless persons released from TDC with drug history	90 days maximum stay
Project Unity – 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, 1,601 vouchers have been granted to households in the Brazos Valley, and 435 (27%) 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 materials 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 dedicated to Fair Housing with information and a link to the Department of Housing and Urban Development.
- Offers homebuyer education classes several times per year that include information on understanding credit, obtaining a mortgage loan, shopping for a home, and basic home maintenance; fair housing regulations are discussed as well.
- All housing program clients receive materials on fair housing through individual counseling with staff
- Presentations to local nonprofit organizations about fair housing rights, educating employees to identify potential fair housing issues with their clients.
- Presentations to local bankers, lenders, and other stakeholders regarding fair housing regulations and local statistics on loan denials.
- Presentations to local landlords renting to Housing Choice Voucher clients.

Other Programming: Brazos Valley Council of Governments, which manages the Housing Choice Voucher Program for the region, coordinates fairs for local residents, which include information on fair housing.

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.
- Offers a homebuyer education course with a curriculum developed by NeighborWorks America, which teaches clients 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 2010, there have been 24 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 17: Fair Housing Complaints

Agency	Case Name	Date Filed	Date Closed	Reason Closed	Complaint Basis	Issue
HUD	Austin Tenants' Council v The District on Luther	03/22/10	7/15/10	Conciliated	Family Status	Discrimination in terms/conditions/privileges relating to rental
HUD	Austin Tenants' Council v The Heights at Luther Street	03/24/10	09/21/10	Conciliated	Family Status	Discriminatory terms, conditions, privileges, or services and facilities
HUD	John Comstock v DC Homeowners Association Inc.	07/07/10	09/21/10	Conciliated	Disability	Failure to make reasonable accommodation
HUD	Lynnitha & Wilbon Spivey v The Hungtington Apartments	08/04/10	09/27/10	No cause	Race	Discriminatory refusal to rent, Discriminatory terms, conditions, privileges, or services and facilities
TWC	W. Keith Bouis v Old Oak Townhomes		07/22/11	Conciliated		
TWC	Lillian Thurman v Oakwood Mobile Home Community		08/12/11	Conciliated		
TWC	Ruben Olague v Park Hudson Apartments		11/18/11	Complaint withdrawn by Complainant		
HUD	Austin Tenants' Council v The Zone at College Station	03/30/10	03/07/12	Conciliated	Family Status	Discriminatory terms, conditions, privileges, or services and facilities
TWC	Matthew Turner v Marie Salinas		03/19/2012	Complaint withdrawn by Complainant		

HUD	Austin Tenants' Council v Callaway Villas, et al.	03/22/10	04/16/12	Conciliated	Family Status	Discriminatory terms, conditions, privileges, or services and facilities
HUD	Austin Tenants' Council v Crossing Place at College Station	03/23/10	04/24/12	Conciliated	Family Status	Discriminatory terms, conditions, privileges, or services and facilities
TWC	Russell Hairston v Fercan Kalkan, Owner		04/28/12	No Cause		
HUD	Deborah Sims v Renaissance Apartments	04/10/12	06/14/12	Administrative Closure	Race	Discriminatory terms, conditions, privileges, or services and facilities
TWC	Calvin Simpson v Brazos Valley Council of Governments		07/31/2012	No Cause		
HUD	Matthew & Candida Sanders v Cedar Ridge at College Station	05/30/12	09/30/12	Conciliated	Family Status	Discriminatory refusal to rent, Discriminatory terms, conditions, privileges, or services and facilities
HUD/TWC	Joe Bailey v Brazos Beachfront Properties, L.P.	05/15/12	10/11/12	Withdrawn with Resolution	Race	Discrimination in terms/conditions/privileges relating to rental
TWC	James Peterson v Brazos Valley Council of Governments		10/29/12	Complainant failed to cooperate		
TWC	Nichole & Joseph Ruiz v Virginia Castleberry		10/18/13	Complaint withdrawn by Complainant		
TWC	Lynda Hardin-Poston v Aggieland RV Park		10/30/13	Complaint withdrawn by Complainant		
TWC	DeAngela Merida & Millie Burs v Brookside Apartments		10/31/13	No Cause		

HUD	Vivian Christian v Walden Pond Apartments	03/19/13	02/28/14	No Cause	Family Status	Discriminatory refusal to rent, Discriminatory terms, conditions, privileges, or services and facilities, Discriminatory acts under Section 818 (coercion, etc.)
TWC	Ieshia Sheppard v Country Place Apartments		03/27/14	No Cause		
TWC	Dernice Franklin v Sammy Destefano		07/30/14	No Cause		
HUD	<i>[no case name given]</i>	03/17/10		Open	Family Status	Discriminatory terms, conditions, privileges, or services and facilities

Administrative Complaints: No administrative complaints have been received by the City since 2010.

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

Protected groups reporting complaints: Of the 24 complaints on record since 2010, three alleged discrimination based on race, eight concerned family status, and one was received from a disabled resident. Those reported upon by the TWC did not include the complaint basis – a total of 12.

Complaint issues/allegations: The predominant issue reported by complainants were discriminatory terms/conditions/privileges or services and facilities (11 complaints), of which all but one have been successfully resolved.

Resolution of complaints: Other than the one investigation by HUD which is 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 2013-2014, two structures in low- and moderate-income level areas were demolished and replaced with affordable homes. 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 residential 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." Community Development staff reviewed real estate sale and rental advertisements published in the local newspaper of record, the Bryan/College Station *Eagle*, and determined 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. Additionally, staff searched through online postings of real estate such as craigslist.com, and no evidence of discriminations was discovered. 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 the development of this Analysis, though there were comparatively few ads. These were reviewed, and the narratives and photos were found to be non-discriminatory. A review of advertisements in the 2015 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 higher 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. The equal housing opportunity logo is not quite as prevalent in their advertising. Though few models are used, use of human models of minority races is sparse. Some references are made to units available to residents with physical disabilities. There is little use of the Spanish language. A number of newspaper/online 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 2010.

- 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 higher minority concentration.
- Evaluation and Analysis of Home Mortgage Disclosure Act (HMDA) Data: HMDA data is reported for the combined College Station-Bryan M.S.A. Separate College Station-only data is not available.

Figure 18: B/CS Conventional Loan Denials by Characteristic Compared to Percentage in B/CS MSA Population		
Characteristic	% of Denials	% in Population
White	71.7%	73.2%
Black	10.4%	11.0%
Hispanic	15.7%	22.9%
Source: 2013 FFIEC HMDA Data		

Of the 357 conventional loan denials reported in 2013, the data above indicate that White, Black, and Hispanic households were denied conventional loans at rates lower than their overall percentages in the population of the College Station-Bryan MSA.

Figure 19: B/CS Conventional Loan Denials by Characteristic			
	Total Number of Loan Applications	Total Number of Loan Applications Denied	% Denied
American Indian/Alaska Native	1	0	0.0%
Asian/Pacific Islander	110	11	10.0%
Black	87	37	42.5%
White	2,320	256	11.0%
Hispanic	222	56	25.2%
<50% of MSA Median	122	55	45.1%
50-79% of MSA Median	297	59	19.9%
80-99% of MSA Median	227	30	13.2%
100-119% of MSA Median	219	33	15.1%
120%+ of MSA Median	1,939	173	8.9%
Source: 2013 FFIEC HMDA Data			

Within different demographic groups, the rates of loan application denials vary widely. When applying for a conventional loan, Black (42.5%) and Hispanic (25.2%) households were denied at a much higher rate than others. Additionally, a large percentage (45.1%) of applicants earning less than 50% the median income were denied; overall, the higher earning the household, the less likely a denial was to occur, with only 8.9% of applications denied from those exceeding 120% of the median income. 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 20: B/CS MSA FHA, VA & FSA/RHS Loan Denials by Characteristic Compared to Percentage in B/CS MSA Population		
Characteristic	% of Denials	% in Population
White	76.6%	73.2%
Black	6.5%	11.0%
Hispanic	15.9%	22.9%
Source: 2013 FFIEC HMDA Data		

Of the 107 insured loan denials reported in 2013, the data above indicate that, as with conventional loans, Black and Hispanic households were denied insured FHA, VA, and FSA/RHS loans at rates lower than their overall percentages in the population of the College Station-Bryan MSA. White household denials slightly exceeded population percentages.

Figure 21: 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	1	1	100.0%
Asian/Pacific Islander	6	1	16.7%
Black	52	7	13.5%
White	761	82	10.8%
Hispanic	137	17	12.4%
<50% of MSA Median	32	14	43.8%
50-79% of MSA Median	197	22	11.2%
80-99% of MSA Median	158	11	7.0%
100-119% of MSA Median	127	14	11.0%
120%+ of MSA Median	411	43	10.5%
Source: 2013 FFIEC HMDA Data			

Rates denials for FHA, VA, and FSA/RHS loans tell a story similar to the denial rates for conventional loans, though the differences are not quite as stark. Some minority (Asian/Pacific Islanders and Blacks) and low-income applicants experience loan application denials at rates well above others, though the sample size for Asian/Pacific Islanders is small. Once again, White and high-income applicants have a low proportion of loan application denials (in fact, all income categories excluding <50% of MSA Median show lower denial rates).

Figure 22: B/CS MSA Refinance Loan Denials by Characteristic Compared to Percentage in B/CS MSA Population		
Characteristic	% of Denials	% in Population
White	73.3%	73.2%
Black	4.5%	11.0%
Hispanic	10.7%	22.9%
Source: 2013 FFIEC HMDA Data		

Of the 625 refinance loan denials in 2013, the data above indicate that minority populations were denied refinance loans at rates lower than their overall percentages in the population of Brazos County. White household denials were nearly identical to the population percentage. However, Blacks were denied conventional loans at a rate about 3% higher than their overall population percentage.

Figure 23: B/CS MSA Refinance Loan Denials by Characteristic			
	Total Number of Loan Applications	Total Number of Loan Applications Denied	% Denied
American Indian/Alaska Native	18	5	27.8%
Asian/Pacific Islander	127	18	14.2%
Black	93	28	30.1%
White	2,720	458	16.8%
Hispanic	263	67	25.5%
<50% of MSA Median	117	45	38.5%
50-79% of MSA Median	255	64	25.1%
80-99% of MSA Median	281	63	22.4%
100-119% of MSA Median	278	53	19.1%
120%+ of MSA Median	2,059	303	14.7%
Source: 2008 FFIEC HMDA Data			

Applications for refinanced loans also reveal stark differences in denial rates between demographic groups. Denial rates were much higher for American Indian/Alaska Native (27.8%), Black (30.1%), Hispanic (25.5%) households, 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 2015 by the City of College Station Community Services Department. Survey respondents ranked affordable single-family homes as the number-one housing need in the College Station market. Affordable rental housing 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: code enforcement; review of zoning policies; and a clearinghouse for property management companies.

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

1. Affordable single-family homes
2. Affordable rental housing
3. Senior housing
4. Rehabilitation of rental units
5. Home repair/rehabilitation
6. Down payment assistance

7. Special needs housing
8. Emergency/homeless shelters
9. Rental assistance programs
10. Security deposit assistance

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 followed by land availability and student market demand. Rounding out the bottom of the list was a lack of participating builders and credit report requirements. Other comments were made which concerned the threat of a local housing bubble as a result of low interest rates and increasing investor interest in single-family homes.

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

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

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 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 of the City's 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 2013 indicated that minority and low/moderate income applicants see their loan applications denied at higher rates than 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.
- Some advertisements for rental units contain a "No HUD" stipulation, reducing the housing options for voucher recipients.

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 fair housing 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-moderate income, 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 Choice 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.

9.0 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, 2013

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

Number of Loans

Race, Gender & Income	Apps. Received	Loans Originated	Apps. Approved But Not Accepted	Apps. Denied	Apps. Withdrawn	Files Closed as Incomplete
RACE OF APPLICANT						
AMERICAN IND/ALASKAN NATIVE (TOTAL)	1	0	0	1	0	0
MALE	0	0	0	0	0	0
FEMALE	0	0	0	0	0	0
JOINT (MALE/FEMALE)	1	0	0	1	0	0
ASIAN/PACIFIC ISLANDER (TOTAL)	6	5	0	1	0	0
MALE	4	3	0	1	0	0
FEMALE	1	1	0	0	0	0
JOINT (MALE/FEMALE)	1	1	0	0	0	0
BLACK (TOTAL)	52	36	1	7	7	1
MALE	17	11	0	3	3	0
FEMALE	19	15	0	2	2	0
JOINT (MALE/FEMALE)	16	10	1	2	2	1
HISPANIC (TOTAL)	137	99	6	17	14	1
MALE	66	46	4	9	6	1
FEMALE	22	21	0	1	0	0
JOINT (MALE/FEMALE)	49	32	2	7	8	0
WHITE (TOTAL)	761	561	36	82	72	10
MALE	279	194	15	35	31	4
FEMALE	140	115	3	11	11	0
JOINT (MALE/FEMALE)	342	252	18	36	30	6
JOINT (WHITE/MINORITY) (TOTAL)	14	12	1	1	0	0
MALE	1	1	0	0	0	0
FEMALE	3	3	0	0	0	0
JOINT (MALE/FEMALE)	10	8	1	1	0	0
RACE NOT AVAILABLE (TOTAL)	98	58	5	15	20	0
MALE	17	5	2	5	5	0
FEMALE	4	4	0	0	0	0
JOINT (MALE/FEMALE)	15	5	2	1	7	0
INCOME OF APPLICANTS						
LESS THAN 50% OF MSA MEDIAN	32	10	4	14	2	2
50-79% OF MSA MEDIAN	197	143	9	22	22	1
80-99% OF MSA MEDIAN	158	120	7	11	19	1
100-119% OF MSA MEDIAN	127	91	4	14	16	2
120% OR MORE OF MSA MEDIAN	411	305	19	43	39	5
INCOME NOT AVAILABLE	9	5	0	3	1	0
TOTAL	934	674	43	107	99	11

**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, 2013**

MSA/MD 17780 – College Station-Bryan, TX

Number of Loans

Race, Gender & Income	Apps. Received	Loans Originated	Apps. Approved But Not Accepted	Apps. Denied	Apps. Withdrawn	Files Closed as Incomplete
RACE OF APPLICANT						
AMERICAN IND/ALASKAN NATIVE (TOTAL)	1	1	0	0	0	0
MALE	0	0	0	0	0	0
FEMALE	1	1	0	0	0	0
JOINT (MALE/FEMALE)	0	0	0	0	0	0
ASIAN/PACIFIC ISLANDER (TOTAL)	111	85	7	11	4	4
MALE	42	33	2	6	1	0
FEMALE	23	17	2	2	1	1
JOINT (MALE/FEMALE)	46	35	3	3	2	3
BLACK (TOTAL)	87	26	21	37	1	2
MALE	37	13	3	19	1	1
FEMALE	34	8	13	13	0	0
JOINT (MALE/FEMALE)	16	5	5	5	0	1
HISPANIC (TOTAL)	222	110	36	56	14	6
MALE	91	48	16	20	5	2
FEMALE	48	22	9	11	5	1
JOINT (MALE/FEMALE)	83	40	11	25	4	3
WHITE (TOTAL)	2,320	1,735	195	256	121	13
MALE	662	467	77	78	34	6
FEMALE	339	234	30	54	20	1
JOINT (MALE/FEMALE)	1,313	1,032	86	122	67	6
JOINT (WHITE/MINORITY) (TOTAL)	26	18	3	4	1	0
MALE	0	0	0	0	0	0
FEMALE	0	0	0	0	0	0
JOINT (MALE/FEMALE)	26	18	3	4	1	0
RACE NOT AVAILABLE (TOTAL)	445	329	29	49	31	7
MALE	36	17	7	9	3	0
FEMALE	29	13	5	5	3	3
JOINT (MALE/FEMALE)	48	27	5	11	4	1
INCOME OF APPLICANTS						
LESS THAN 50% OF MSA MEDIAN	122	42	17	55	7	1
50-79% OF MSA MEDIAN	297	169	56	59	12	1
80-99% OF MSA MEDIAN	227	145	31	30	16	5
100-119% OF MSA MEDIAN	219	151	21	33	11	3
120% OR MORE OF MSA MEDIAN	1,939	1,522	120	173	108	16
INCOME NOT AVAILABLE	186	165	10	7	4	0
TOTAL	2,990	2,194	255	357	158	26

**AGGREGATE TABLE 4-3: DISPOSITION OF APPLICATIONS TO REFINANCE LOANS ON 1 TO 4 FAMILY
AND MANUFACTURED HOME DWELLINGS, BY RACE, ETHNICITY, GENDER AND INCOME OF
APPLICANT, 2013**

MSA/MD 17780 – College Station-Bryan, TX

Number of Loans

Race, Gender & Income	Apps. Received	Loans Originated	Apps. Approved But Not Accepted	Apps. Denied	Apps. Withdrawn	Files Closed as Incomplete
RACE OF APPLICANT						
AMERICAN IND/ALASKAN NATIVE (TOTAL)	18	6	3	5	2	2
MALE	11	3	1	4	2	1
FEMALE	4	2	1	0	0	1
JOINT (MALE/FEMALE)	3	1	1	1	0	0
ASIAN/PACIFIC ISLANDER (TOTAL)	127	86	3	18	15	5
MALE	59	39	1	10	8	1
FEMALE	15	10	0	1	2	2
JOINT (MALE/FEMALE)	53	37	2	7	5	2
BLACK (TOTAL)	93	40	9	28	12	4
MALE	28	12	2	5	6	3
FEMALE	37	15	4	14	3	1
JOINT (MALE/FEMALE)	28	13	3	9	3	0
HISPANIC (TOTAL)	263	118	17	67	36	25
MALE	111	44	8	33	17	9
FEMALE	45	22	3	9	7	4
JOINT (MALE/FEMALE)	106	52	5	25	12	12
WHITE (TOTAL)	2,720	1,649	174	458	294	145
MALE	799	437	55	165	104	38
FEMALE	437	260	28	68	50	31
JOINT (MALE/FEMALE)	1,478	949	91	223	139	76
JOINT (WHITE/MINORITY) (TOTAL)	35	22	1	8	4	0
MALE	1	1	0	0	0	0
FEMALE	0	0	0	0	0	0
JOINT (MALE/FEMALE)	34	21	1	8	4	0
RACE NOT AVAILABLE (TOTAL)	464	226	16	107	78	37
MALE	52	18	0	20	10	4
FEMALE	27	9	2	10	2	4
JOINT (MALE/FEMALE)	70	34	2	16	11	7
INCOME OF APPLICANTS						
LESS THAN 50% OF MSA MEDIAN	117	39	9	45	19	5
50-79% OF MSA MEDIAN	255	127	16	64	36	12
80-99% OF MSA MEDIAN	281	144	19	63	39	16
100-119% OF MSA MEDIAN	278	162	16	53	31	16
120% OR MORE OF MSA MEDIAN	2,059	1,305	126	303	223	102
INCOME NOT AVAILABLE	468	252	20	97	57	42
TOTAL	3,458	2,029	206	625	405	193

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, 2013

MSA/MD: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										
AMERICAN IND/ALASKAN NATIVE	0	0	0	0	1	100	0	0	0	0
ASIAN/PACIFIC ISLANDER	0	0	0	0	0	0	0	0	0	0
BLACK	0	0	0	0	3	100	0	0	0	0
HISPANIC	5	26	0	0	7	37	2	11	2	11
WHITE	24	28	3	4	28	33	6	7	6	7
2 OR MORE MINORITY RACES	0	0	0	0	0	0	0	0	0	0
JOINT (WHITE/MINORITY)	1	50	0	0	0	0	0	0	0	0
RACE NOT AVAILABLE	3	33	0	0	2	22	1	11	1	11
GENDER										
MALE	13	29	2	4	17	38	2	4	4	9
FEMALE	3	20	0	0	5	33	1	7	2	13
JOINT (MALE/FEMALE)	10	27	1	3	12	32	3	8	1	3
GENDER NOT AVAILABLE	2	67	0	0	0	0	1	33	0	0
INCOME										
LESS THAN 50% OF MSA MEDIAN	6	46	0	0	3	23	1	8	1	8
50-79% OF MSA MEDIAN	6	21	1	4	8	29	2	7	4	14
80-99% OF MSA MEDIAN	4	36	0	0	3	27	2	18	0	0
100-119% OF MSA MEDIAN	2	20	0	0	4	40	1	10	1	10
120% OR MORE OF MSA MEDIAN	10	28	2	6	14	39	1	3	1	3
INCOME NOT AVAILABLE	0	0	0	0	2	100	0	0	0	0

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, 2013

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	0	0	0	0	0	0	0	0	1	100
ASIAN/PACIFIC ISLANDER	0	0	0	0	0	0	0	0	0	-
BLACK	0	0	0	0	0	0	0	0	3	100
HISPANIC	1	5	1	5	0	0	1	5	19	100
WHITE	6	7	3	4	0	0	9	11	85	100
JOINT (WHITE/MINORITY)	1	50	0	0	0	0	0	0	2	100
RACE NOT AVAILABLE	2	22	0	0	0	0	0	0	9	100
GENDER										
MALE	2	4	1	2	0	0	4	9	45	100
FEMALE	0	0	0	0	0	0	4	27	15	100
JOINT (MALE/FEMALE)	7	19	2	5	0	0	1	3	37	100
GENDER NOT AVAILABLE	0	0	0	0	0	0	0	0	3	100
INCOME										
LESS THAN 50% OF MSA MEDIAN	1	8	0	0	0	0	1	8	13	100
50-79% OF MSA MEDIAN	2	7	1	4	0	0	4	14	28	100
80-99% OF MSA MEDIAN	1	9	0	0	0	0	1	9	11	100
100-119% OF MSA MEDIAN	0	0	1	10	0	0	1	10	10	100
120% OR MORE OF MSA MEDIAN	5	14	1	3	0	0	2	6	36	100
INCOME NOT AVAILABLE	0	0	0	0	0	0	0	0	2	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, 2013

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										
AMERICAN IND/ALASKAN NATIVE	0	0	0	0	0	0	0	0	0	0
ASIAN/PACIFIC ISLANDER	2	14	0	0	1	7	2	14	2	14
BLACK	3	19	1	6	8	50	0	0	0	0
HISPANIC	3	8	2	5	13	34	3	8	2	5
WHITE	33	18	1	1	43	23	27	15	9	5
JOINT (WHITE/MINORITY)	1	33	0	0	2	67	0	0	0	0
RACE NOT AVAILABLE	7	18	2	5	9	23	8	20	1	3
GENDER										
MALE	15	17	2	2	23	26	11	12	2	2
FEMALE	12	32	0	0	8	22	3	8	3	8
JOINT (MALE/FEMALE)	13	12	2	2	29	26	16	15	7	6
GENDER NOT AVAILABLE	6	26	0	0	3	13	7	30	0	0
INCOME										
LESS THAN 50% OF MSA MEDIAN	11	37	0	0	7	23	2	7	3	10
50-79% OF MSA MEDIAN	4	13	2	6	16	50	2	6	1	3
80-99% OF MSA MEDIAN	3	15	1	5	6	30	1	5	0	0
100-119% OF MSA MEDIAN	4	20	0	0	7	35	2	10	0	0
120% OR MORE OF MSA MEDIAN	22	14	1	1	27	18	30	20	8	5
INCOME NOT AVAILABLE	2	50	0	0	0	0	0	0	0	0

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, 2013

MSA: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	0	0	0	0	0	0	0	0	0	-
ASIAN/PACIFIC ISLANDER	2	14	2	14	0	0	3	21	14	100
BLACK	0	0	0	0	0	0	4	25	16	100
HISPANIC	2	5	5	13	1	3	7	18	38	100
WHITE	14	8	22	12	3	2	34	18	186	100
JOINT (WHITE/MINORITY)	0	0	0	0	0	0	0	0	3	100
RACE NOT AVAILABLE	3	8	4	10	1	3	5	13	40	100
GENDER										
MALE	5	6	10	11	2	2	19	21	89	100
FEMALE	3	8	4	11	0	0	4	11	37	100
JOINT (MALE/FEMALE)	9	8	12	11	1	1	21	19	110	100
GENDER NOT AVAILABLE	2	9	2	9	1	4	2	9	23	100
INCOME										
LESS THAN 50% OF MSA MEDIAN	1	3	2	7	1	3	3	10	30	100
50-79% OF MSA MEDIAN	1	3	3	9	1	3	2	6	32	100
80-99% OF MSA MEDIAN	1	5	3	15	0	0	5	25	20	100
100-119% OF MSA MEDIAN	2	10	1	5	0	0	4	20	20	100
120% OR MORE OF MSA MEDIAN	14	9	18	12	2	1	31	20	153	100
INCOME NOT AVAILABLE	0	0	1	25	0	0	1	25	4	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, 2013

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										
AMERICAN IND/ALASKAN NATIVE	2	40	0	0	1	20	2	40	0	0
ASIAN/PACIFIC ISLANDER	4	22	0	0	1	6	1	6	1	6
BLACK	2	7	0	0	12	41	2	7	4	14
HISPANIC	12	20	1	2	17	29	6	10	4	7
WHITE	76	18	3	1	74	18	70	17	14	3
JOINT (WHITE/MINORITY)	0	0	1	14	0	0	1	14	1	14
RACE NOT AVAILABLE	11	14	0	0	25	32	15	19	2	3
GENDER										
MALE	28	17	1	1	27	17	24	15	6	4
FEMALE	12	17	0	0	14	20	11	15	4	6
JOINT (MALE/FEMALE)	48	18	3	1	52	20	48	18	11	4
GENDER NOT AVAILABLE	7	13	0	0	20	38	8	15	1	2
INCOME										
LESS THAN 50% OF MSA MEDIAN	14	39	1	3	11	31	3	8	3	8
50-79% OF MSA MEDIAN	13	24	0	0	15	27	9	16	3	5
80-99% OF MSA MEDIAN	16	26	0	0	15	25	10	16	3	5
100-119% OF MSA MEDIAN	6	15	0	0	10	25	7	18	0	0
120% OR MORE OF MSA MEDIAN	44	16	2	1	39	14	58	21	10	4
INCOME NOT AVAILABLE	2	3	1	1	23	29	4	5	3	4

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, 2013

MSA:17780-College Station - Bryan, TX

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Applicant Characteristics	Unverifiable Information		Credit Appl. Incomplete		Mortgage Insurance Denied		Other		Total	
	Number	%	Number	%	Number	%	Number	%	Number	%
RACE										
AMERICAN IND/ALASKAN NATIVE	0	0	0	0	0	0	0	0	5	100
ASIAN/PACIFIC ISLANDER	3	17	6	33	0	0	2	11	18	100
BLACK	0	0	3	10	0	0	6	21	29	100
HISPANIC	5	8	8	14	0	0	6	10	59	100
WHITE	36	9	59	14	1	0	79	19	412	100
JOINT (WHITE/MINORITY)	0	0	2	29	0	0	2	29	7	100
RACE NOT AVAILABLE	3	4	8	10	0	0	13	17	77	100
GENDER										
MALE	16	10	30	18	0	0	31	19	163	100
FEMALE	1	1	12	17	0	0	17	24	71	100
JOINT (MALE/FEMALE)	23	9	29	11	1	0	48	18	263	100
GENDER NOT AVAILABLE	2	4	8	15	0	0	6	12	52	100
INCOME										
LESS THAN 50% OF MSA MEDIAN	0	0	1	3	0	0	3	8	36	100
50-79% OF MSA MEDIAN	0	0	6	11	0	0	9	16	55	100
80-99% OF MSA MEDIAN	3	5	8	13	0	0	6	10	61	100
100-119% OF MSA MEDIAN	1	3	4	10	1	3	11	28	40	100
120% OR MORE OF MSA MEDIAN	31	11	41	15	0	0	54	19	279	100
INCOME NOT AVAILABLE	7	9	19	24	0	0	19	24	78	100