2019 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

CITY OF DALTON

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Executive Summary

Background

The City of Dalton, as an entitlement community under the U.S. Department of Housing and Urban Development's (HUD) is required to submit certification of affirmatively furthering fair housing. This certification has three elements and requires that the City:

1. Complete an Analysis of Impediments to Fair Housing Choice (AI);
2. Take actions to overcome the effects of any impediments identified; and
3. Maintain records reflecting the actions taken in response to the analysis.

HUD describes impediments to fair housing choice in terms of their applicability to local, state and federal law. The federal Fair Housing Act defines impediments as:

Any actions, omissions or decisions taken because of race, color, religion, sex, national origin, familial status, and mental or physical disability which restrict housing choices or the availability of housing choice.

The AI process involves a thorough examination of a variety of sources related to housing, affirmatively furthering fair housing, the fair housing delivery system and housing transactions, particularly for persons who are protected under fair housing law. AI sources include census data, employment and income information, federal and state fair housing complaint information, surveys of housing industry experts and stakeholders, and related information found in the public domain.

An AI also includes an involved public input and review process via direct contact with stakeholders, public forums to collect input from citizens and interested parties, distribution of draft reports for citizen review, and formal presentations of findings and possible actions to overcome the identified impediments.

Research Methodology

The 2019 City of Dalton Analysis of Impediments to Fair Housing Choice offers a thorough examination of a variety of sources related to housing, such as demographic change, economic influences, and the state of the housing market, but also information pertaining to affirmatively furthering fair housing, the state of the fair housing delivery system and housing transactions affecting people throughout Dalton. This information was collected and evaluated through four general approaches:

1. *Primary Research* – the collection and analysis of raw data that did not previously exist.

2. *Secondary Research* – the review of existing data and studies.

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3. *Quantitative Analysis* – the evaluation of objective, measurable and numerical data.

4. *Qualitative Analysis* – the evaluation and assessment of subjective data, such as people's beliefs, feelings, attitudes, opinions and experiences.

Some of the baseline secondary and quantitative data providing a picture of the city's housing marketplace were drawn from the 2010 census and intercensal estimates. These data included population, personal income, poverty estimates, housing units by tenure, cost burdens, and housing conditions. Other data were drawn from records provided by the Bureau of Economic Analysis, the Bureau of Labor Statistics and a variety of other sources. The narrative below offers a brief description of other key data sources employed for the 2019 Dalton AI.

Community Engagement

- **Stakeholder Surveys in conjunction with this Analysis**- a survey was designed to collect information from community stakeholders. These surveys were distributed in hard-copy format and were also hosted online through SurveyMonkey.com to provide an alternative means of response.

  The Fair Housing Survey was designed to collect input from a broad spectrum of the community and received responses from City of Dalton residents and non-residents. The survey consisted of 32 distinct questions, allowing a mixture of both multiple choice and open-ended responses. In all, there were 31 responses to this survey, though not every question was answered by every respondent. As a result, where a percentage of survey respondents are cited in this Analysis, it refers only to the percentage of respondents to the question being discussed and may not be a percentage of the full 31 survey respondents.

  Surveys were received over from March 1, 2019 to May 1, 2019. Paper surveys received were manually entered by the Survey Administrator into Survey Monkey for tabulation and analysis.   To prevent "ballot stuffing", the Survey Monkey software bars the submission of multiple surveys from a single IP address. The link to the online survey was distributed through various email distribution lists.

- **Stakeholder Interviews** – Key groups of community stakeholders were identified, contacted, and interviewed as part of this Analysis.   These stakeholders included representatives of nonprofit organizations (especially nonprofit housing developers), municipal officials, City of Dalton staff, fair housing advocates, members of City Council, and homeless service providers. Other stakeholders not belonging to any of these groups were occasionally interviewed as dictated by the course of research carried out for this Analysis.

- **Public Meeting** – A public meeting was held to provide a forum for City of Dalton residents and other interested parties to contribute to this Analysis held on Thursday, March 21, at 2:00pm at the Mack Gaston Community Center for residents to attend. This meeting was advertised via flyers distributed by the City of Dalton using its various mailing distribution lists. Local libraries and nonprofits receiving the posters were asked to print and post or distribute them as appropriate. The format of these meetings ranged from small-group roundtable discussions to moderated forums. Notes were taken of the public comments at all meetings.

Overview of Findings

Demographic Overview

This section presents demographic and economic information collected from the Census Bureau, the Bureau of Economic Analysis, the Bureau of Labor Statistics, and other sources. Data was used to analyze a broad range of socioeconomic characteristics, including population growth, age, employment, income, poverty, and health care access and status. Ultimately, the information presented in this section helps illustrate the underlying conditions that have shaped housing market behavior and housing choice in the study area.

To supplement 2010 census data, information for this analysis was also gathered from the Census Bureau's American Community Survey (ACS). The ACS data covers similar topics as the decennial counts, but also includes data not appearing in the 2010 census such as household income and poverty. The key difference in these datasets is that ACS data represents samples as opposed to a 100 percent count; however, population distributions from the ACS data can be compared to those from the census.

According to the 2017 ACS 5-year estimates, the City of Dalton had a total population of 33,540, which represented a 1% increase since 2010. The City's racial makeup consisted of 82% White, 8% Black or African American, 6% identified as some other race and less than .01% of the City of Dalton's population identified as Asian, Native American, Pacific Islanders, or as belonging to two or more races. The City's ethnic makeup consisted of 51% of the populations identifying as Hispanic or Latino of any race.

Labor Force and Total Employment

Data regarding the labor force, defined as the total number of persons working or looking for work and employment, as gathered from the decennial census and American Community Survey estimates in 2017, 21% of people 25 years and over had a high school diploma or equivalency and 18% had a bachelor's degree or higher. Thirty-three percent were not enrolled in school and had not graduated from high school.

Employment Status and Type of Employer

In the City of Dalton, 56% of the population 16 and over were employed; 36% were not currently in the Labor force. Eighty-nine percent of the people employed were private wage and salary workers; 7% were federal, state, or local government workers; and 4% were self-employed in their own (not incorporated) business.

Unemployment Rates in City of Dalton

According to the Bureau of Labor Statistics, City of Dalton unemployment rates were typically below national and regional averages in the time between 2013 and 2017. City of Dalton experienced an increase in unemployment, due to the recession from 2007-2009 and unemployment rates averaged 12.9% in 2009 and 13% in 2010. However, unemployment rates have steadily declined and are 5% as of December 2018, an 8% decrease since 2010.

Racially and Ethnically Concentrated Areas of Poverty

Racially and ethnically-concentrated areas of poverty (R/ECAPs), according to HUD's established thresholds, in 2010. These tracts have a non-white population that is greater than or equal to 50% and meet either of the following poverty criteria: the poverty rate of a tract is 1) higher than 40% or 2) more than three times the average poverty rate of tracts in the metropolitan area. The racial/ethnic threshold is lowered to 20% for tracts located outside of metropolitan/micropolitan areas. HUD used component data from the decennial census (2010) and the American Community Survey (2009-2013) to determine which geographies met R/ECAP criteria in 2010.

Housing by Tenure

Housing by Tenure According to the U.S. Census, the number of housing units in Dalton has decreased by 2.8% from 13,132 in 2010 to 12,862 in 2017. The City's vacancy rate also decreased from 18.8% in 201010.8% in 2017. Including vacant units in 2017, the City of Dalton contained4,646owner-occupied units (41.4%), 6,578renter-occupied units (58.6%), and 1,638 vacant units (12.7%).

Home Mortgage Disclosure Act (HMDA) Data and Analysis

To examine possible fair housing issues in the home mortgage market, Home Mortgage Disclosure Act (HMDA) data were analyzed. The HMDA was enacted by Congress in 1975 and has since been amended several times. It is intended to provide the public with loan data that can be used to determine whether financial institutions are serving the housing credit needs of their communities and to assist in identifying possible discriminatory lending patterns. HMDA requires lenders to publicly disclose the race, ethnicity, and sex of mortgage applicants, along with loan application amounts, household income, the Census tract in which the home is located, and information concerning prospective lender actions related to the loan application. For this analysis, HMDA data from 2015 through 2017 was analyzed, with the measurement of denial rates

by Census tract and by race and ethnicity of applicants the key research objectives. These data were also examined to identify the groups and geographic areas most likely to encounter higher denial rates and receive loans with unusually high interest rates.

Among the tracts analyzed, there were 365 loan applications submitted for purchase, refinancing, improvement of owner-occupied homes, and FHA/VA loans. Of this total, 306 (83.3%) of all applications were denied. Our analysis will focus largely on the characteristics of those applications that were denied.

Fair Housing Enforcement, Outreach Capacity, and Resources
The Federal Fair Housing Act refers to Title VIII of the Civil Rights Act of 1968. This Act protects individual's right to rent an apartment, buy a home, obtain a mortgage, or purchase homeowners insurance free from discrimination based on: race, color, national origin, religion, sex, familial status, and disability.

Region IV of the Office of Fair Housing and Equal Opportunity (FHEO) receives complaints by households regarding alleged violations of the Fair Housing Act for cities and counties throughout Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, South Carolina, and Tennessee. The mission of the FHEO is to protect individuals from employment, housing, and public accommodation discrimination, and hate violence. To achieve this mission, the FHEO maintains databases of and investigates complaints of housing discrimination, as well as complaints in the areas of employment, housing, public accommodations, and hate violence. According to HUD FHEO no complaints have been filed in the last five years for the City of Dalton.

Impediments & Suggested Actions

The City of Dalton has identified impediments to fair housing choice and recommendations for specific actions that the City could take to reduce or remove those impediments. This section will review any current impediments identified through this 2019 study, discuss the issues related to the impediments and their impact on members of the protected classes and the community, and provide recommendations to the City.

The recommendations will consist of both reactive and proactive actions to address the impediments and ultimate acceptance and implementation of any or all recommendations will be done by the City's governing Council. This section will also review the impediments and action plan identified in the City's prior 2014 AI and the status of fair housing activities and whether the impediments then still need addressing.

One of the main implications of the July 2013 Proposed Fair Housing Rule is more of a focus on "affirmatively furthering fair housing" activities in the Consolidated Plan process. Fair housing planning will become one of the factors in setting Consolidated Plan priorities and how resources are to be committed including fair housing activities. Many of the recommendations contained in this report are based on a proactive or "affirmative" approach that reflects the goals and objectives of the proposed Fair Housing Rule up to its becoming a final rule.

In order to develop a viable implementation plan, the City may view the recommendations as a framework for addressing the impediments and a guide to facilitate further community dialogue, research, feasibility testing, and fair housing action planning.

Update to 2014 Previous Impediments and Recommendations

The City of Dalton's 2014 AI identified two (2) impediments to fair housing choice and provided recommendations for specific actions that the City could take to reduce or remove those impediments. This section will review the impediments and action plan identified in the City's 2014 AI and the status of those impediments.

Previous Impediment #1: Lack of Public Transportation

Planned Action/Goal #1: Continue to work with Whitfield review transportation planning efforts to advocate public infrastructure improvements that align with the goal of expanding of expanding housing choice.

Timeline: Annually, beginning FY 2014

Current status: The City is currently maintaining its efforts to review transportation planning for with the County.

Updated Recommendation(s): This impediment will continue to be addressed with the actions of the City and communication efforts will be maintained in the future.

Previous Impediment #2: Lack of Fair Housing Education

Planned Action/Goal #2: Annually reserve a portion of CDBG public service funding to be awarded as a competitive Fair Housing Grant to an organization that will carry out a comprehensive fair housing testing program in the City.

Timeline: Annually, beginning FY 2014

Current status: The City has awarded previous CDBG public service funds to local organizations to undertake Fair Housing Activities.

Updated Recommendation(s): This impediment has been addressed with the actions of the City. However, it is recommended that these activities should be held annually in the future.

Current 2019 Impediments and Recommendations

Impediment 1: Lack of affordable housing for Dalton residents.

Action: Increase the production and preservation of affordable housing units.

Recommendation
The City should increase the supply of affordable housing for renters and homeowners by supporting the development of inclusive housing projects by leveraging federal, state, and local public funding with private sector funding.

Status: The review of CHAS data and an analysis of housing affordability in the City of Dalton indicates that there is a shortage in the supply of affordable housing units for both owners and renters and that minorities are disproportionately impacted by housing cost burden as a result of economic pressures and other external conditions. In recent years, public funding, including CDBG funds have been declining and in order to increase the number of affordable housing units, the City shall work towards leveraging, as much as possible, with private sector funds and other government funds to increase the variety and affordability of housing suitable for different types of households.

Impediment 2: Inadequate fair housing education and awareness in community, especially for underrepresented and minority populations with Limited English Proficiency (LEP).

Action: Continue fair housing education and outreach and expand opportunities for fair housing training for underrepresented populations such as Asian Americans, persons with disabilities including the hearing impaired, the Lesbian, Gay, Bisexual, and Transgender (LGBT) community, and persons with LEP.

Recommendation
The City of Dalton should expand its fair housing education and outreach efforts to groups that are underrepresented in its pool of clients to help continue to keep the public informed of their rights and specifically targeting more efforts in minority areas.

Status: As part of the AI process, the City sought the input from several minority populations that are underrepresented groups. The City has also increased its outreach to minority populations especially persons of Hispanic/Latino ethnicity and the elderly. The City will also continue to increase education and awareness of the CDBG Program through partnerships with agencies that represent individuals and families with LEP.

Introduction

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

- The Fair Housing Act,

- The Housing Amendments Act, and

- The Americans with Disabilities Act.

State or local governments may enact fair housing laws that extend protection to other groups as well. For example, the Texas Fair Housing Act, protects individual's right to rent an apartment, buy a home, obtain a mortgage, or purchase homeowners insurance free from discrimination based on: race, color, national origin, religion, sex, familial status, and disability.

Why Assess Fair Housing?
Provisions to affirmatively further fair housing are long-standing components of HUD's housing and community development programs. These provisions flow from Section 808(e) (5) of the Federal Fair Housing Act, which requires that the Secretary of HUD administer HUD's housing and urban development programs in a manner that affirmatively furthers fair housing.

In 1994, HUD published a rule consolidating plans for housing and community development programs into a single preparation: the Consolidated Plan for Housing and Community Development. This document incorporates the plans for original consolidated programs, including Community Development Block Grants (CDBG). As a part of the consolidated planning process (24 CFR 91), states and entitlement communities receiving such funds as a formula allocation directly from HUD are required to submit to HUD certification that they are affirmatively furthering fair housing. This certification has three parts and requires:

Conducting an Analysis of Impediments to Fair Housing Choice (AI);

- Taking appropriate actions to overcome the effects of any impediments identified through the analysis; and

- Maintaining records reflecting the analysis and actions taken.

HUD interprets these three certifying elements to entail:

- Analyzing and working to eliminate housing discrimination in the jurisdiction;

- Promoting fair housing choice for all people;

- Providing opportunities for racially and ethnically inclusive patterns of housing occupancy;

- Promoting housing that is physically accessible to, and usable by, all people, particularly individuals with disabilities; and

- Fostering compliance with the nondiscrimination provisions of the Fair Housing Act.

On July 16, 2015, the Affirmatively Furthering Fair Housing (AFFH) Final Rule was published providing program participants with an approach to more effectively and efficiently incorporate into the planning process the duty of affirmatively furthering the policies of the Fair Housing Act. The purpose of this rule was to refine the prior analysis of impediments approach by replacing it with a fair housing assessment tool that would better inform HUD program participants' planning process and assist them in fulfilling the statutory obligation. Per the AFFH Rule, no Assessment of Fair Housing (AFH) will be due before the publication of the Assessment Tool applicable to the program participant. In addition, HUD must provide a minimum of nine (9) months after publication of the Assessment Tool when setting the deadline for submission of the AFH.

On Friday, January 5, 2018, HUD published Federal Notice Document 2018-00106, titled: *Affirmatively Furthering Fair Housing: Extension of Deadline for Submission of Assessment of Fair Housing for Consolidated Plan Participants.*This notice advises that HUD is extending the deadline for submission of an Assessment of Fair Housing (AFH) by local government consolidated plan program participants to their next AFH submission date that falls after October 31, 2020. Per the guidance, the City of Dalton will continue to meet the obligation of affirmatively furthering fair housing by conducting an Analysis of Impediments to Fair Housing Choice.

Purpose of This Research

Thus, the purpose of the *2019 City of Dalton Analysis of Impediments to Fair Housing Choice* is to research, analyze and identify prospective impediments to fair housing choice and to suggest actions that the City can consider in working toward eliminating, overcoming or mitigating the identified impediments.

Community Participation Process

The City of Dalton Community Development Department implemented a robust outreach strategy to inform residents of the Affirmatively Furthering Fair Housing process and to reaffirm its commitment to community engagement and outreach throughout its program activities. The

City of Dalton Community Development Department sought to gather input from residents on housing an opportunity issues through a number of strategies to engage a range of community stakeholders and residents.

Community participation was received through several methods during the Analysis of Impediments process. Local organizations and members of the public provided input on Fair Housing through:

- Stakeholder Interviews
- Flyers
- Surveys

Stakeholder Interviews – Key groups of community stakeholders were identified, contacted, and interviewed as part of this Analysis. These stakeholders included representatives of nonprofit organizations (especially nonprofit housing developers), City of Dalton staff, fair housing advocates, and homeless service providers. Other stakeholders not belonging to any of these groups were occasionally interviewed as dictated by the course of research carried out for this Analysis.

A series of stakeholder interviews were conducted with organizations that are active in housing, community development, fair housing and public service activities in Dalton.

Interviews that could not be conducted in person were conducted over the phone. Interviews were held at the Community Development Office and other community based offices to ensure a time and place that was convenient. The goal of these interviews was to go beyond the quantitative data to gain perspective on the community development challenges and impediments to fair housing from a wide array of non-profit developers and service providers. Stakeholders were asked about the community assets, challenges, and needs across the City. These leaders were then asked to provide their input of fair housing challenges identified in the most recent Analysis of Impediments and actions the city could potentially take to address impediments moving forward.

Led by professional facilitators, the focus groups sought input from residents throughout the city, including Spanish-speaking residents and residents with disabilities. To recruit participants for these focus groups, the City used leaders from various stakeholder organizations to initially reach out to potential attendees.

In an online or paper survey the respondent can only answer the questions asked by choosing from the answers offered. To get a deeper sense of the individual experiences of Dalton residents, the City conducted a focus group with public housing residents. The input was robust and plentiful and provided a deep discussion of some of the issues in public housing.

Stakeholder Surveys - a survey was designed to collect information from community stakeholders. The survey was developed in both English and Spanish as a majority of the population speaks Spanish as their first language. The survey was primarily advertised online through email distribution lists to all local stakeholders, city staff, housing authority staff, and citizens to garner input on Fair Housing issues. Survey Monkey, an online survey repository hosted the survey online.

City of Dalton recognized that not every citizen has access to a computer at home and that many citizens accessed computers at libraries and at neighborhood-based computer labs. To reach that population, the City developed fliers to advertise the survey and upcoming meetings. Additionally, the survey was also distributed onsite at the local health departments, the library, and other community centers in a paper format to engage those captive audiences.

The survey was designed to collect input from a broad spectrum of the community and received responses from City of Dalton residents and non-residents. The survey consisted of 32 distinct questions, allowing a mixture of both multiple choice and open-ended responses. In all, there were 31 responses to this survey, though not every question was answered by every respondent. As a result, where a percentage of survey respondents are cited in this Analysis, it refers only to the percentage of respondents to the question being discussed and may not be a May 1, 2019. Paper surveys received were manually entered by the Survey Administrator into SurveyMonkey for tabulation and analysis. To prevent "ballot stuffing", the Survey Monkey software bars the submission of multiple surveys from a single IP address. The link to the online survey was distributed through various email distribution lists.

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These meetings were advertised via flyers distributed by the City of Dalton using its various mailing distribution lists. Local libraries and nonprofits receiving the posters were asked to print and post or distribute them as appropriate. The format of these meetings ranged from small-group roundtable discussions to moderated forums. Notes were taken of the public comments at all meetings.

COMMUNITY PROFILE

Introduction

The 2010 U.S. Census represents the most recent data from the U.S. Census, and that data is used for this report when possible and available. Some areas of data-gathering, however, requires use of the American Community Survey (ACS) which provides most informational items as the decennial Census, but not always at the lowest geographic levels. The ACS is an ongoing statistical survey that is annually conducted by the United States Census Bureau. The survey gathers information previously contained only in the long form of the decennial census.

The 2010 Census, American Community Survey, in addition to a variety of other highly regarded data sources were utilized for the preparation of this report, including Home Mortgage Disclosure Act (HMDA) data; Community Reinvestment Act (CRA) reports; RealtyTrac data service. Overall, the data paint a revealing and fair portrait of the community and housing conditions therein.

The City of Dalton includes 18 census tracts. Of those tracts, 6 meet the HUD definition of low to moderate income census areas. The map reflects the Dalton census tract boundaries, and low to moderate income census areas as defined by HUD.

2017 Low & Moderate Income Areas
Dalton, Georgia

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Demographic Overview

This section presents demographic and economic information collected from the Census Bureau, the Bureau of Economic Analysis, the Bureau of Labor Statistics, and other sources. Data was used to analyze a broad range of socioeconomic characteristics, including population growth, age, employment, income, poverty, and health care access and status. Ultimately, the information presented in this section helps illustrate the underlying conditions that have shaped housing market behavior and housing choice in the study area.

To supplement 2010 census data, information for this analysis was also gathered from the Census Bureau's American Community Survey (ACS). The ACS data covers similar topics as the decennial counts, but also includes data not appearing in the 2010 census such as household income and poverty. The key difference in these datasets is that ACS data represents samples as opposed to a 100 percent count; however, population distributions from the ACS data can be compared to those from the census.

Population Characteristics

According to the 2017 ACS 5-year estimates, the City of Dalton had a total population of 33,540, which represented a 1% increase since 2010. The City's racial makeup consisted of 82% White, 8% Black or African American, 6% identified as some other race and less than .01% of the City of Dalton's population identified as Asian, Native American, Pacific Islanders, or as belonging to two or more races. The City's ethnic makeup consisted of 51% of the populations identifying as Hispanic or Latino of any race.

Dalton Demographic Profile Highlights 2017 US Census Figures		
Total Population	33,540	100%
Male	16,368	49%
Female	17,172	51%
White	27,539	82%
Black or African American	2,538	8%
American Indian/Alaska Native	242	1%
Asian	834	2%
Native Hawaiian/Pacific Islander	0	0%
Other race	1,931	6%
Two or more races	758	2%
Hispanic	17,046	51%
Non-Hispanic	16,494	49%

Source: 2017 ACS 5-Year Estimates

Since 2017, 4% of City of Dalton residents moved from another county in Georgia, 2% moved from another state, and less than 1% moved from abroad.

Population by Age

According to the 2017 American Community Survey 5-year estimates, approximately 29% of the City's population is between the ages of 25 and 44. The number of younger residents exceeds the number of residents ages 45 and 64 (20%). The City's population of ages between 65 and 85 represented 11% of the residents. The median age in City of Dalton is 31 years, which is considerably younger than the nationwide median age of 37 years and the State's median age of 38 years.

The distribution of age remained consistent for many age groups between 2010 and 2017. However, the population of younger and middle career workers decreased between 2010 and 2017, most likely due to the Great Recession and decreased economic opportunity. Additionally, the number of senior residents ages 55 and older has increased indicating a need for continued planning for the needs of the senior citizen and elderly population.

Age	2010 Census		2017 ACS		2000 – 2017 % Change
	Population	Share of Total	Population	Share of Total	
Under 5 years	3,140	9.70%	2,380	7.10%	3%
5 to 19	7,122	22.00%	8,641	25.76%	4%
20 to 24	2,622	8.10%	2,599	7.75%	0%
25 to 34	5,374	16.60%	4,836	14.42%	-2%
35 to 54	8,094	25.00%	8,474	25.27%	0%
55 to 64	2,622	8.10%	3,027	9.03%	1%
65 and Over	3,399	10.50%	3,583	10.68%	0%
Total	32,373	100.00%	33,540	100.00%	5.21%

Source: 2010 U.S. Census and American Community Survey 2017 5-Years Estimate

Labor Force and Total Employment

Data regarding the labor force, defined as the total number of persons working or looking for work and employment, as gathered from the decennial census and American Community Survey estimates in 2017, 21% of people 25 years and over had a high school diploma or equivalency and 18% had a bachelor's degree or higher. Thirty-three percent were not enrolled in school and had not graduated from high school.

City of Dalton is home to many of the nation's floor-covering manufacturers, primarily those producing carpet, rugs and vinyl flooring. It is home to the Northwest Georgia Trade and

Convention Center, which showcases the Georgia Athletic Coaches' Hall of Fame and hosts a variety of events annually.

Employment Status and Type of Employer

In the City of Dalton, 56% of the population 16 and over were employed; 36% were not currently in the Labor force. Eighty-nine percent of the people employed were private wage and salary workers; 7% were federal, state, or local government workers; and 4% were self-employed in their own (not incorporated) business.

Class of worker	Number	Percent
Private wage and salary workers	12,311	89.2
Federal, state, or local government workers	964	7.0
Self-employed workers in own not incorporated business	532	3.9

Source: Bureau of Labor Statistics Local Area Unemployment, http://www.bls.gov

Unemployment Rates in City of Dalton

According to the Bureau of Labor Statistics, City of Dalton unemployment rates were typically below national and regional averages in the time between 2013 and 2017. City of Dalton experienced an increase in unemployment, due to the recession from 2007-2009 and unemployment rates averaged 12.9% in 2009 and 13% in 2010. However, unemployment rates have steadily declined and are 5% as of December 2018, an 8% decrease since 2010.

Year	2014	2015	2016	2017	2018
Unemployment Rate	7.1%	6.2%	6.0%	5.6%	5%

Source: Bureau of Labor Statistics Local Area Unemployment, http://www.bls.gov

In the City of Dalton, 56% of the population 16 and over were employed; 36 percent were not currently in the labor force. Eighty-nine percent of the people employed were private wage and salary workers; 7% were federal, state, or local government workers; and 4% were self-employed in their own (not incorporated) business.

Employed Population 16 years and older	Number	Percent
Management, business, science, and arts occupations	3,222	23.3
Service occupations	1,814	13.1
Sales and office occupations	2,696	19.5
Natural resources, construction and maintenance occupations	1,128	8.2
Production, transportation, material moving occupations	4,947	35.8

Poverty

The Census Bureau uses a set of income thresholds that vary by family size and composition to determine poverty status. If a family's total income is less than the threshold for its size, then that family, and every individual in it, is considered poor. The poverty thresholds do not vary geographically, but they are updated annually for inflation using the Consumer Price Index. The official poverty definition counts income before taxes and does not include capital gains and non-cash benefits such as public housing, Medicaid, and food stamps. Further, poverty is not defined for persons in military barracks, institutional group quarters, or for unrelated individuals under age 15 such as foster children.

In 2017, 27 percent of people were in poverty. Thirty-nine percent of related children under 18 were below the poverty level, compared with 8% of people 65 years old and over. Twenty-four percent of all families and 41% of families with a female householder and no husband present had incomes below the poverty level.

Poverty Rates in Dalton city, Georgia in 2010–2012

Category	Rate
Female householder families	40.7
All families	23.6
Related children under 18 years	39.0
People age 65 and over	8.2
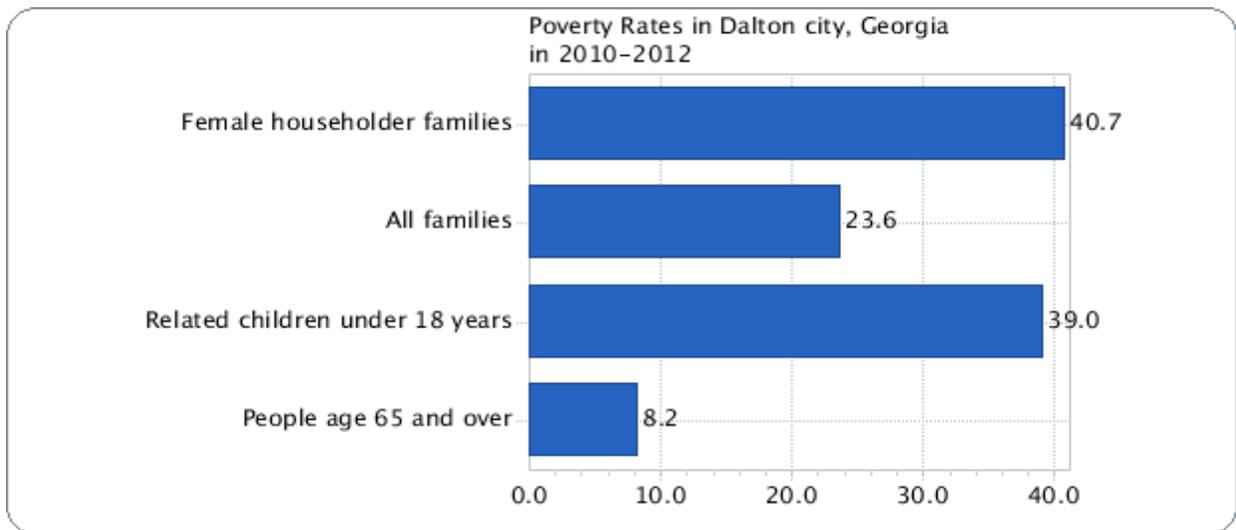
Source: American Community Survey 2017 5-year estimates

The poverty rate for children and adolescents under the age of 18 was 33% in 2017, with more than 3 in 10 children experiencing poverty, according to the American Community Survey. Childhood poverty can be linked to negative outcomes in child development, health, and education. For example, children who experience early and persistent poverty are more likely to experience childhood and adult depression and anxiety, become high school drops outs, not seek higher education, and have higher rates of unemployment, criminal histories, use of public welfare, and experiences of poverty as an adult.[1] Each of these personal outcomes carry negative

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[1]Duncan, Greg J., Kathleen M. Ziol-Guest, and Ariel Kalil. "Early-Childhood Poverty and Adult Attainment, Behavior, and Health." *Child development* 81, no. 1 (2010): 306-325.

economic outcomes in lost earnings, revenue, disposable income for local economies, and increased public expenditures on public welfare programs and social services.

Senior citizens and elderly residents had a poverty rate of 10.9%. Poverty rates for City of Dalton also correlate with race and ethnicity with racial and ethnic minorities experiencing higher rates of poverty in comparison to White residents. The 2017 rate of poverty for Latino residents was 27% a slight decrease from the 2012 high of 38%. African-Americans experienced increased rates of poverty from 29.6% in 2012 to 44.9% in 2017. The poverty rates for the City's racial and ethnic minorities who are not captured in the ethnicities of White, Latino, African-American, and Asian are at 23.7%. The poverty rate for American Indian and Alaska Native residents is at 100%. The chart below depicts poverty trend in relation to race and ethnicity in City of Dalton.
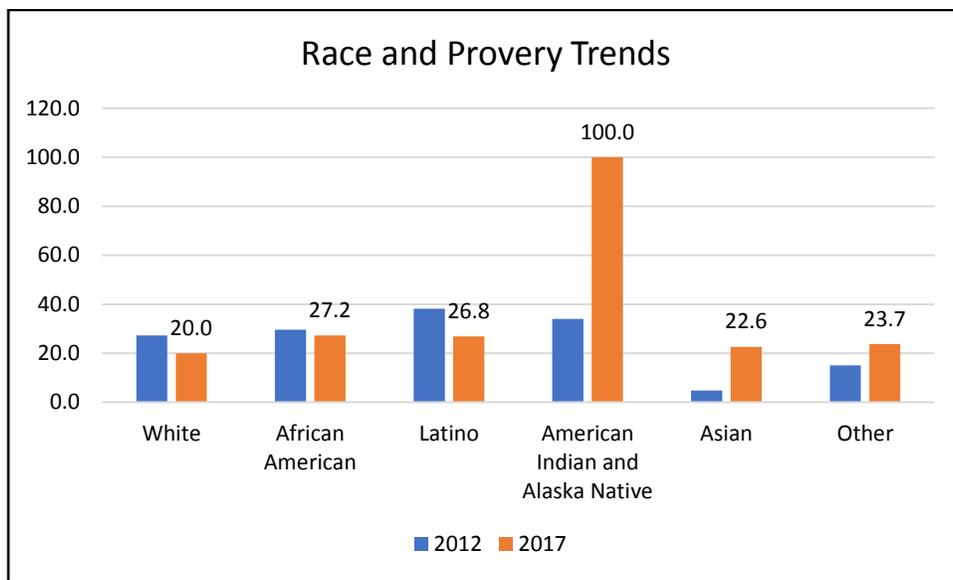
Source: American Community Survey 5-year estimates for 2012 and 2017.

According to Census data, 23% City of Dalton's population is below 100% of the poverty line.

Household Income

The median household income for City of Dalton was $39,408 in 2017, an increase of 1% from the 2010 median of $38,798. Eighty-one percent of the households received earnings and 7% received retirement income other than Social Security. Twenty-three percent of the households received Social Security. The average income from Social Security was $15,518. These income sources are not mutually exclusive; that is, some households received income from more than one source.

Income Range	City of Dalton Households by Income 2017	
	Households	Percent
Less than $10,000	876	8%
$10,000 to $14,999	954	9%
$15,000 to $24,999	1785	16%
$25,000 to $34,999	1414	13%
$35,000 to $49,999	1773	16%
$50,000 to $74,999	2144	19%
$75,000 to $99,999	887	8%
$100,000 to $149,999	640	6%
$150,000 to $199,999	324	3%
$200,000 or more	427	4%
2010 TOTALS	11,224	100%

Source: U.S. Census Bureau, American Community Survey 2017 5-Year Estimates

Use of public welfare resources has increased throughout the City since 2010. According to the 2017 American Community Survey, 1,527 households in the City of Dalton received Food Stamp/SNAP benefits. Those residents using food assistance benefits consisted of families in poverty (35%) and families with disabled residents (23%). Racial and ethnic minority groups, which are protected classes, had a moderate need for use of food assistance including African-Americans (32%) and Latinos (11%). Additionally, 11% of white residents in the City of Dalton needed food assistance, indicating that large percentages of the top three racial groups in the City needed food assistance.

Health Care Access and Status

According to the 2017 American Community Survey, 24.3% of residents were uninsured. Among the civilian noninstitutionalized population in the City, 76% had health insurance coverage. For those under 18 years of age, 13% had no health insurance coverage. The civilian noninstitutionalized population had both private and public health insurance, with 52% having private coverage and 32% having public coverage.

Racially and Ethnically Concentrated Areas of Poverty

Racially and ethnically-concentrated areas of poverty (R/ECAPs), according to HUD's established thresholds, in 2010. These tracts have a non-white population that is greater than or equal to 50% and meet either of the following poverty criteria: the poverty rate of a tract is 1) higher than 40% or 2) more than three times the average poverty rate of tracts in the metropolitan area. The racial/ethnic threshold is lowered to 20% for tracts located outside of metropolitan/micropolitan areas. HUD used component data from the decennial census (2010) and the American Community Survey (2009-2013) to determine which geographies met R/ECAP criteria in 2010. Tracts where no data were provided are labelled "Insufficient Data."

Analyzing the concentration of minorities in high poverty areas assists in the review of access to housing. The data used for this analysis was gathered from the Federal Financial Institutions Examination Council (FFIEC) census files. The tract population, minority percentage, and poverty data is based on 2010 census data. There are 8 census tracts in Dalton that are considered R/ECAP census tracts. There is a total of 47,445 persons residing in the 8 R/ECAP tracts representing 45.8% of the City's total population. Of this amount, 40,910 persons are minorities and account for 39.5% of the share of Dalton's minority population. Table 3 below, provides a list of the R/ECAP census tracts and population data.

R/ECAP Census Tracts and Population

Tract Code	Tract Median Family Income %	% Below Poverty Line	Tract Minority %	Tract Population	Tract Minority Population
1.01	119.35	11.60	5.68	3994	227
7.00	121.08	17.20	8.33	4767	397
2.00	112.31	16.75	12.64	3979	503
15.00	98.06	11.01	17.06	5639	962
6.00	106.79	14.01	18.28	4273	781
8.00	124.48	13.58	23.58	7800	1839
1.02	122.99	12.18	24.7	8365	2066
5.01	122.27	13.81	28.14	4218	1187
3.02	122.94	9.04	29.05	9251	2687
9.00	155.56	14.47	33.18	3725	1236
3.01	94.89	23.28	47.05	4287	2017
14.00	114.72	7.85	48.06	6665	3203
11.00	78.16	27.42	52.97	5033	2666
5.02	85.65	34.93	54.99	6876	3781
12.00	92.15	27.28	59.34	7838	4651
4.00	79.22	22.07	71.72	7861	5638
13.00	53.81	46.37	77.29	4391	3394
10.00	59.24	25.74	81.78	4494	3675

Source: *Federal Financial Institutions Examination Council's (FFIEC),www.ffiec.gov*

Racially/Ethnically Areas of Poverty as a share of Total Population
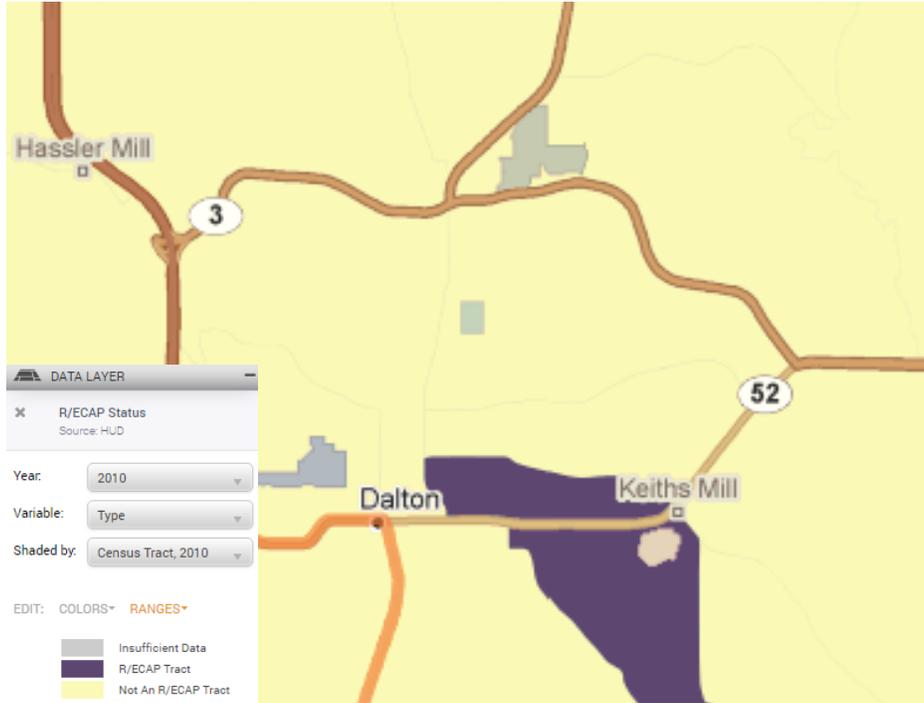
Source: Policy Map, www.policymap
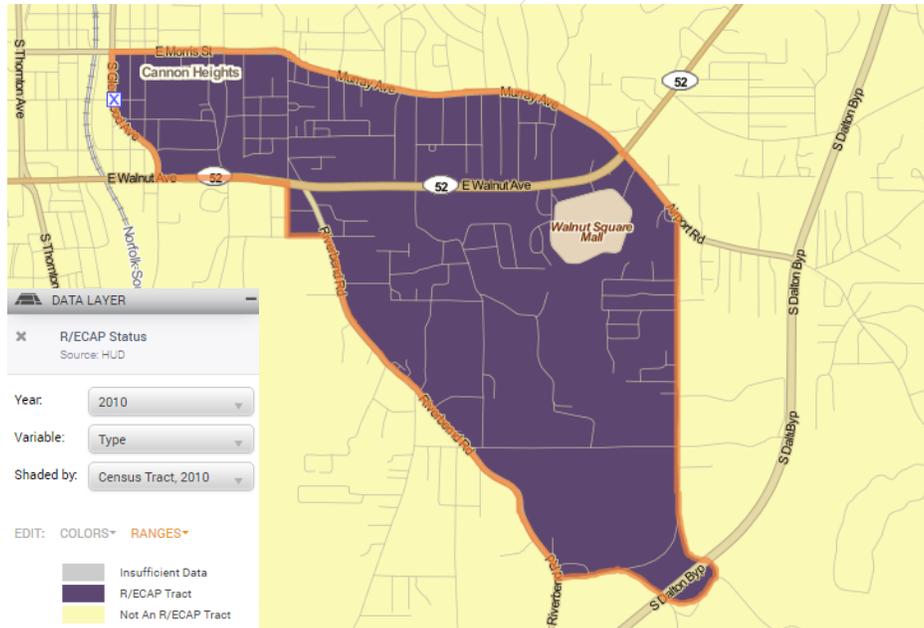
Source: Policy Map, www.policymap

Housing Profile

Housing by Tenure

Housing by Tenure According to the U.S. Census, the number of housing units in Dalton has decreased by 2.8% from 13,132 in 2010 to 12,862 in 2017. The City's vacancy rate also decreased from 18.8% in 2010 10.8% in 2017. Including vacant units in 2017, the City of Dalton contained 4,646 owner-occupied units (41.4%), 6,578 renter-occupied units (58.6%), and 1,638vacant units (12.7%).

Total Occupied and Vacant Housing Units by Type, City of Dalton, 2017
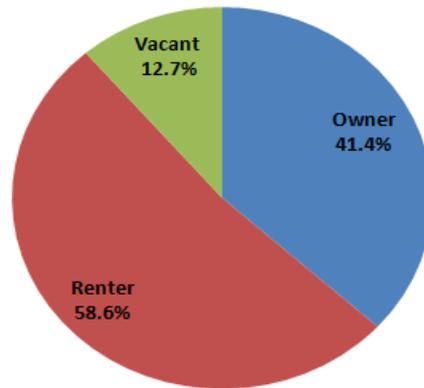
Source: US Census, www.census.gov

Not including vacant units, of the 12,862 occupied (non-vacant) 58.6% (6,578) were renter-occupied. This represents an increase in the rate of rental housing, up 16.4% from 2010, and a corresponding decrease in homeownership tenure, 41.4% in 2017.

Occupied Housing Units, Dalton 2017
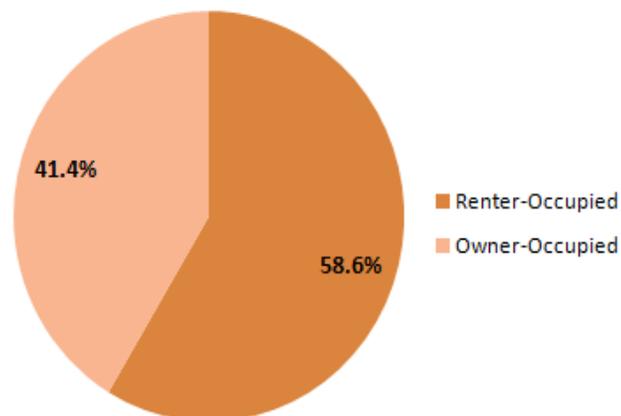
Source: US Census, www.census.gov

Housing Conditions

The 2017 American Community Survey reports 525,228 total housing units in Dalton, and gives a break-out of the types of units in the Dalton housing stock, as well as the year structures were built.

Housing Units by Type - Dalton, GA 2017

	Dalton city, Georgia	
	Estimate	Percentage
Total:	**12,862**	**100%**
1, detached	5,782	44.95%
1, attached	665	5.17%
2	825	6.41%
3 or 4	1,597	12.42%
5 to 9	1,620	12.60%
10 to 19	1,327	10.32%
20 to 49	556	4.32%
50 or more	338	2.63%
Mobile home	152	1.18%
Boat, RV, van, etc.	0	0.00%

Source: US Census, www.census.gov

Year Structure Built, Dalton, GA 2017

	Dalton city, Georgia	
	Estimate	Percent
Total:	**12,862**	**100%**
Built 2014 or later	40	0.31%
Built 2010 to 2013	38	0.30%
Built 2000 to 2009	2,301	17.89%
Built 1990 to 1999	2,253	17.52%
Built 1980 to 1989	2,424	18.85%
Built 1970 to 1979	2,102	16.34%
Built 1960 to 1969	1,690	13.14%
Built 1950 to 1959	1,124	8.74%
Built 1940 to 1949	479	3.72%
Built 1939 or earlier	411	0.00%

Source: US Census, www.census.gov

The predominant type of housing in Dalton is the single-unit, detached structure (44.9%), followed by structures with 5 to 9 units (12.6%), structures with 3 to 4 units (12.4%), and structures with 10 to 19 units (10.3%). The housing stock is considered to be of newer construction, with the majority (54.8%) of structures being built after to 1970 and almost 41.9% of structures being built before 1970.

Housing Affordability

The median value of an owner-occupied housing unit in 2017 was $136,200. Using the industry standard of three (3) times income to afford a 2017 median priced home in Dalton, a household would need to earn $38,360 annually to affordably own a three-bedroom home in Dalton.

Annual Income Needed to Afford	Georgia	Whitfield County
ZERO-BEDROOM	$29,786	$22,520
ONE-BEDROOM	$31,105	$23,880
TWO-BEDROOM	$36,459	$27,840
THREE-BEDROOM	$48,239	$38,360
FOUR-BEDROOM	$58,510	$39,920

Source: National Low Income Housing Coalition, https://reports.nlihc.org/oor/georgia

According to the 2017 American Community Survey, median contract rent in Dalton was $676 monthly.

GROSS RENT		
Occupied units paying rent	**6,300**	**100%**
Less than $500	1,136	18.03%
$500 to $999	4,657	73.92%
$1,000 to $1,499	465	7.38%
$1,500 to $1,999	42	3.70%
$2,000 to $2,499	0	0
$2,500 to $2,999	0	0
$3,000 or more	0	0
Median (dollars)	676	

Source: US Census, www.census.gov

ACS data for 2017 indicates that Dalton has 2,665 owners with mortgages and overall approximately 25.3 percent spend 30 percent or more on monthly housing costs. Of these owners, 177 or 6.6 percent pay more than 30 to 34.9 percent of their household income on housing costs; and 498 or 18.7 percent pay 35 percent or more.

Housing units with a mortgage		**2,665**
Less than $500	32	1.2%
$500 to $999	1,190	44.7%
$1,000 to $1,499	805	30.2%
$1,500 to $1,999	219	8.2%
$2,000 to $2,499	155	5.8%
$2,500 to $2,999	75	2.8%
$3,000 or more	189	7.1%
Median (dollars)	1,048	(X)
Housing units without a mortgage		**1,981**
Less than $250	334	16.9%
$250 to $399	705	35.6%
$400 to $599	552	27.9%
$600 to $799	212	10.7%
$800 to $999	112	5.7%
$1,000 or more	66	3.3%
Median (dollars)	389	(X)
SELECTED MONTHLY OWNER COSTS AS A PERCENTAGE OF HOUSEHOLD INCOME		
Less than 20.0 percent	1,340	50.30%
20.0 to 24.9 percent	452	17.00%
25.0 to 29.9 percent	198	7.40%
30.0 to 34.9 percent	177	6.60%
35.0 percent or more	498	18.70%

Source: US Census, www.census.gov

According to the 2017 ACS data, there are 6,127 renter households and approximately 44.8 percent pay 30 percent or more of their household income on rental housing costs monthly; of this number 561 or 9.2 percent pay 30 to 34.9 percent of their income on rental housing costs. Another 2,184 or 35.6 percent pay 35 percent or more on renter housing costs.

GROSS RENT AS A PERCENTAGE OF HOUSEHOLD INCOME (GRAPI)		
Occupied units paying rent (excluding units where GRAPI cannot be computed)	**6,127**	**100%**
Less than 15.0 percent	1,036	16.90%
15.0 to 19.9 percent	848	13.80%
20.0 to 24.9 percent	778	12.70%
25.0 to 29.9 percent	720	11.80%
30.0 to 34.9 percent	561	9.20%
35.0 percent or more	2,184	35.60%

Source: US Census, www.census.gov

Comprehensive Housing Affordability Strategy (CHAS)

HUD's Comprehensive Housing Affordability Strategy (CHAS) is a commonly-used gauge of housing affordability, or lack thereof. HUD considers a housing unit affordable if the occupant household expends no more than 30% of its income on housing cost. In the situation where the household expends greater than 30% of its income on housing cost, the household is considered cost burdened. In cases where housing cost is 50% of income or greater, the household is considered severely cost burdened. Cost burdened households have less financial resources to meet other basic needs (food, clothing, transportation, medical, etc.), less resources to properly maintain the housing structure, and are at greater risk for foreclosure or eviction.

Income Categories
- Extremely Low Income: 0%-30% of the Area Median Income (AMI)
- Low Income: 31%-50% of the AMI
- Moderate Income: 51%-80% of the AMI
- Middle and Upper Income: 80% or More of the AMI

Cost-Burden of Owners and Renters

According to HUD, a household with problems consists of:

1. Persons and families living in units with physical defects (lacking a complete kitchen of bath); or
2. Persons and families living in overcrowded conditions (greater than 1.01 persons/room); or
3. Persons and families who are cost burdened (paying more than 30% of income for housing, including utilities).

Although the 2017 ACS data provides an estimate of the number of households that are cost-burdened, CHAS data provides the number and percentages of households by income level within the City of Dalton that had housing problems as well as the size and type of household. The below analysis is based on this data. The latest available CHAS data is generated from the 2009-2013 ACS data, while dated, provides detailed information about housing cost burdens for all categories.

CHAS data indicates that more rental households experience at least one housing problem in comparison to homeowners. In addition, a greater percentage of rental households are cost-burdened than homeowners.

Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	0	30	50	60	140	0	0	0	0	0
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	35	0	10	10	55	0	4	0	0	4
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	35	245	170	55	505	15	85	35	70	205
Housing cost burden greater than 50% of income (and none of the above problems)	545	450	55	0	1,050	65	160	90	40	355
Housing cost burden greater than 30% of income (and none of the above problems)	50	580	610	145	1,385	10	155	245	105	515
Zero/negative Income (and none of the above problems)	120	0	0	0	120	15	0	0	0	15

Table 1 – Housing Problems Table

Data Source: 2009-2013 CHAS

Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen

or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	610	725	285	125	1,745	80	250	125	110	565
Having none of four housing problems	135	790	1,190	615	2,730	25	305	650	435	1,415
Household has negative income, but none of the other housing problems	120	0	0	0	120	15	0	0	0	15

Table 2 – Housing Problems 2

Data Source: 2009-2013 CHAS

Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	245	375	320	940	10	25	225	260
Large Related	55	230	25	310	10	100	25	135
Elderly	130	329	110	569	10	229	85	324
Other	195	320	235	750	50	30	25	105
Total need by income	625	1,254	690	2,569	80	384	360	824

Table 3 – Cost Burden > 30%

Data Source: 2009-2013 CHAS

Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	225	85	15	325	10	0	45	55
Large Related	40	80	0	120	0	100	0	100
Elderly	115	225	40	380	10	115	45	170

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Other	180	130	0	310	50	15	0	65
Total need by income	560	520	55	1,135	70	230	90	390

Table 4 – Cost Burden > 50%

Data Source: 2009-2013 CHAS

Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	55	220	130	55	460	10	85	35	45	175
Multiple, unrelated family households	15	25	35	10	85	4	4	0	25	33
Other, non-family households	0	0	15	0	15	0	0	0	0	0
Total need by income	70	245	180	65	560	14	89	35	70	208

Table 5 – Crowding Information – 1/2

Data Source: 2009-2013 CHAS

Overall, both renters and owners in elderly households and small-related households experience a similar degree of housing problems as well as cost-burden and severe cost-burden. Low income elderly households, low income small related rental households, and moderate income small related owner households were most impacted by cost burden. Extremely low income households across all categories experienced greater incidences of severe cost burden. Large related households is the group most disproportionately affected by housing problems. Although large related renter households is the group most impacted with cost burden, the level of cost burden and severe cost burden for large related households is proportionate to owners and renters in the other household types examined. This indicates that affordability is not the greatest obstacle for large households in Dalton.

Subsidized Multi-family Affordable Housing Stock

One of the ways to address fair housing choice is to provide a wide range of housing choices for residents. For communities that have a higher need for rental housing stock, multi-family housing developments for a variety of income groups and ages such as the elderly. Accessible housing needs can also be addressed by providing housing for persons with disabilities. However, in addressing these needs, there are concerns about racial and ethnic concentrations of housing. The following are some of the multi-family housing types that meet the needs of low income, elderly and persons with disabilities in the City of Dalton.

The City does not own or operate any public housing. The Housing Authority of the City of Dalton (HACD) is a separate legal entity that oversees public housing within the City's jurisdiction. While the Housing Authority does not currently have any public housing developments, the do operate and maintain affordable units. Most of the units operated by the Dalton Housing Authority are in desperate need of renovation. Many of the duplexes were built in the late 1960s and haven't had any major upgrades since they were built. The some of the units do not have central heat and air conditioning. In the last year, the Housing Authority has begun to conduct renovations to many of the units which included replacing doors, roof, windows, central heat and air, kitchen, bathrooms. Since 2005, the Dalton Housing Authority has not participated in an approved Public Housing Agency Plan through HUD.

Other subsided housing options within the City, include low income housing tax credit multifamily developments. According to HUD's Low Income Housing Tax Credit [LIHTC] database, the City has 213 low income units located throughout the City. The following is a listing of LIHTC properties.

City of Dalton Low Income Tax Credit Housing

HUD ID Number:	Project Name:	Project Address:	Project City:	Project State:	Project ZIP Code:	Total Number of Units:	Total Low-Income Units:
GA20040010	AUTUMN RIDGE	850 AUTUMN CT	DALTON	GA	30721	130	117
GAA20010045	DAWNVILLE MEADOWS	556 HORSESHOE WAY	DALTON	GA	30721	120	96

Source: HUD Low-Income Housing Tax Credit Database. http://lihtc.huduser.org

Location of Subsidized Housing
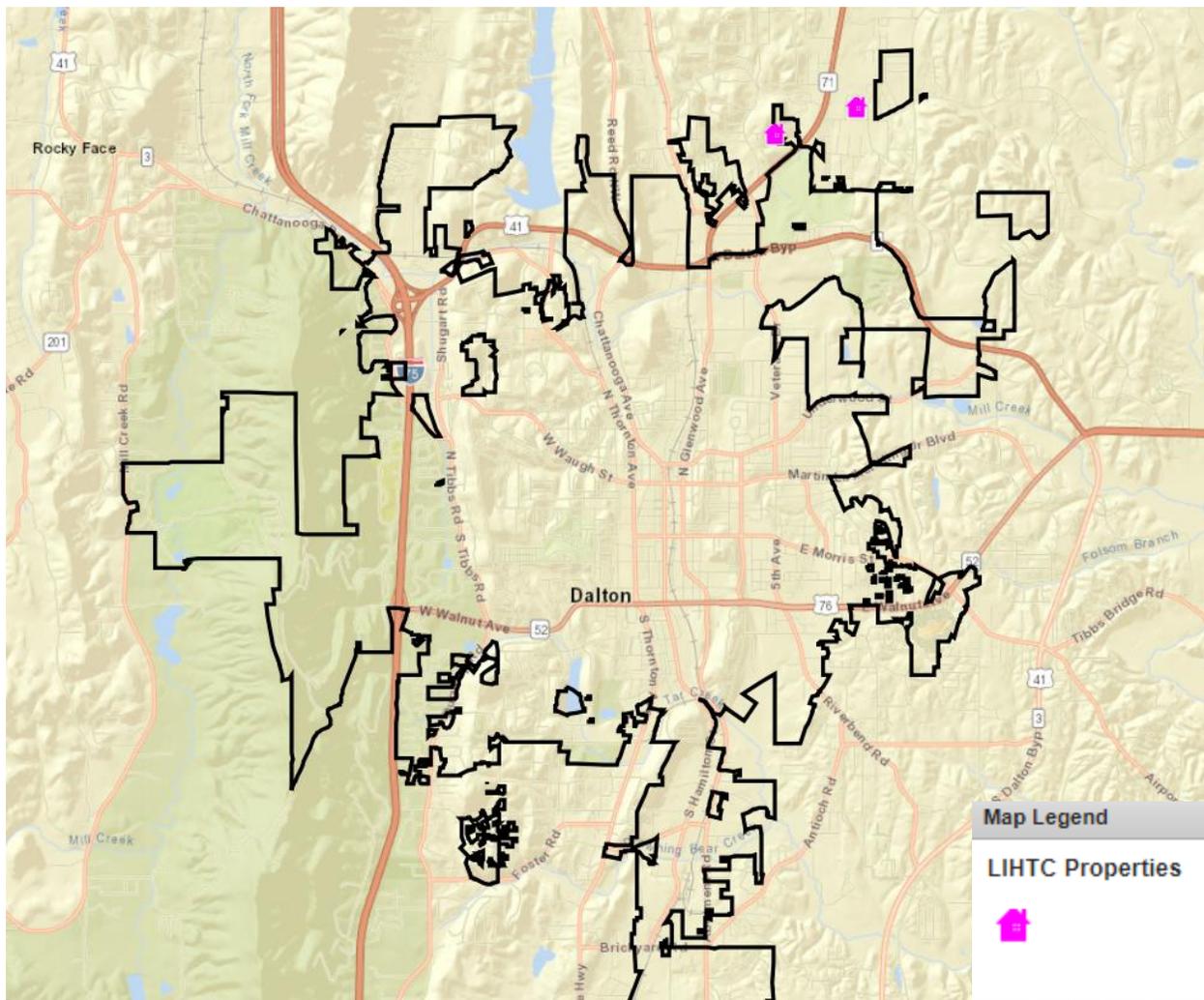
Source: HUD CPD Maps, https://egis.hud.gov/cpdmaps/

Housing Stock Available to Persons with Disabilities

To determine if there is sufficient housing available for disabled persons you need to first determine the number of persons in the City that meet the definition of disabled. HUD defines a disabled person as " any person who has a physical or mental impairment that substantially limits one or more major life events (walking, talking, hearing, seeing, breathing, learning, performing manual tasks, and caring for one self); has a record of such impairment; or is regarded as having such an impairment.

The most recent data comprehensive data on disability status among Dalton's population was the U.S. Census 2017 American Community Survey. According to the 2017 ACS, 8.7% (2,891

persons) of civilian non-institutionalized population reported a disability. The data included the following breakdown of the disabled population by age group. The highest percentage of disabilities occurs in the 65 and over population group (22.4%) and then35 to 64 category has the next largest number of disabled persons.

Disability Status of the Civilian Non-Institutionalized Population

	Total	With a disability	Percent with a disability
Total civilian noninstitutionalized population	33,211	2,891	8.7%
Under 5 years	2,378	7	0.3%
5 to 17 years	7,643	307	4.%
18 to 34 years	8,389	223	2.7%
35 to 64 years	11,444	1,212	10.6%
65 to 74 years	1,799	403	22.4%

Source: US Census, www.census.gov

The 2017 American Community Survey also provides information regarding type of disabilities within the Dalton population, as well as the incidence of two or more disabilities within age groups. Persons with ambulatory disabilities are the most common in the city, representing 4.9% of all disabilities in Dalton. The least common disability reported among Dalton residents was vision difficulty.

Disability Type

	With a Disability	Percent with a Disability
With a hearing difficulty	842	2.5%
With a vision difficulty	672	2%
With a cognitive difficulty	939	3%
With an ambulatory difficulty	1,508	4.9%
With a self-care difficulty	757	2.5%
With an independent living difficulty	993	4.3%

Source: US Census, www.census.gov

Housing Stock Available to Elderly Persons

According to the 2017 U.S. Census, there are 1,552 elderly persons (over 65 years of age) living in Dalton comprising 33.4% of the population. Of the 1,552 elderly persons, 571 persons (12.3%) are age of 75 and over and are considered to be extra elderly or frail elderly. The population over 55 years of age makes up a smaller percentage of the overall population however, this segment of the population has been growing significantly faster than the younger age groups.

Population Distribution by Age Group

	Total	Percent
Total:	11,224	100%
Owner occupied:	4,646	
Householder 15 to 24 years	0	0
Householder 25 to 34 years	316	6.8%
Householder 35 to 44 years	869	18.7%
Householder 45 to 54 years	969	20.9%
Householder 55 to 59 years	522	11.2%
Householder 60 to 64 years	418	9.0%
Householder 65 to 74 years	798	17.2%
Householder 75 to 84 years	571	12.3%
Householder 85 years and over	183	3.9%
Renter occupied:	6,578	100%
Householder 15 to 24 years	505	7.7%
Householder 25 to 34 years	2,000	30.4%
Householder 35 to 44 years	1,482	22.5%
Householder 45 to 54 years	1,225	18.6%
Householder 55 to 59 years	314	4.8%
Householder 60 to 64 years	270	4.1%
Householder 65 to 74 years	362	5.5%
Householder 75 to 84 years	356	5.4%
Householder 85 years and over	64	1.0%

Source: US Census, www.census.gov

Home Mortgage Disclosure Act (HMDA) Data and Analysis

To examine possible fair housing issues in the home mortgage market, Home Mortgage Disclosure Act (HMDA) data were analyzed. The HMDA was enacted by Congress in 1975 and has since been amended several times. It is intended to provide the public with loan data that can be used to determine whether financial institutions are serving the housing credit needs of their communities and to assist in identifying possible discriminatory lending patterns. HMDA requires lenders to publicly disclose the race, ethnicity, and sex of mortgage applicants, along with loan application amounts, household income, the Census tract in which the home is located, and information concerning prospective lender actions related to the loan application. For this analysis, HMDA data from 2015 through 2017 was analyzed, with the measurement of denial rates by Census tract and by race and ethnicity of applicants the key research objectives. These data were also examined to identify the groups and geographic areas most likely to encounter higher denial rates and receive loans with unusually high interest rates.

Since the 1970s, the federal government has enacted several laws aimed at promoting fair lending practices in the banking and financial services industries. A brief description of selected federal laws aimed at promoting fair lending follows:

- The 1968 Fair Housing Act prohibits discrimination in housing based on race, color, religion, and national origin. Later amendments added sex, familial status, and disability. Under the Fair Housing Act, it is illegal to discriminate against any of the protected classes in the following types of residential real estate transactions: making loans to buy, build, or repair a dwelling; selling, brokering, or appraising residential real estate; and selling or renting a dwelling.

- The Equal Credit Opportunity Act was passed in 1974 and prohibits discrimination in lending based on race, color, religion, national origin, sex, marital status, age, receipt of public assistance, and the exercise of any right under the Consumer Credit Protection Act.

- The Community Reinvestment Act was enacted in 1977 and requires each federal financial supervisory agency to encourage financial institutions in order to help meet the credit needs of the entire community, including low- and moderate-income neighborhoods.

- Under the Home Mortgage Disclosure Act (HMDA), enacted in 1975 and later amended, financial institutions are required to publicly disclose the race, sex, ethnicity, and household income of mortgage applicants by the Census tract in which the loan is proposed as well as outcome of the loan application. The analysis presented herein is from the HMDA data system.

The HMDA requires both depository and non-depository lenders to collect and publicly disclose information about housing-related applications and loans. Both types of lending institutions must meet the following set of reporting criteria:

1. The institution must be a bank, credit union, or savings association;
2. The total assets must exceed the coverage threshold;
3. The institution must have had an office in a Metropolitan Statistical Area (MSA);
4. The institution must have originated at least one home purchase loan or refinancing of a home purchase loan secured by a first lien on a one- to four-family dwelling;
5. The institution must be federally insured or regulated; and
6. The mortgage loan must have been insured, guaranteed, or supplemented by a federal agency or intended for sale to the Federal National Mortgage Association (FNMA or Fannie Mae) or the Federal Home Loan Mortgage Corporation (FHLMC or Freddie Mac). These agencies purchase mortgages from lenders and repackage them as securities for investors, making more funds available for lenders to make new loans.

For other institutions, including non-depository institutions, additional reporting criteria are as follows:

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

HMDA data represent most mortgage lending activity and are thus the most comprehensive collection of information available regarding home purchase originations, home remodel loan originations, and refinancing. The Federal Financial Institutions Examination Council (FFIEC) makes HMDA data available on its website. While HMDA data are available for more years than are presented in the following pages, modifications were made in 2016 for documenting loan applicants' race and ethnicity, so data are most easily compared after that point.

Using the loan data submitted by the financial institutions, the Federal Financial Institutions Examination Council (FFIEC) creates aggregate tables for each metropolitan statistical area (MSA) or metropolitan division (MD) (where appropriate), and individual institution disclosure reports. The FFIEC provides the HMDA databases online as raw data and with retrieval software on compact disk.

Data can be retrieved or ordered at their website http://www.ffiec.gov/hmda/hmdaproducts.htm.The data contain variables that facilitate analysis of mortgage lending activity, such as race, income, census tract, loan type, and loan purpose.

Median dollar amount of home purchase loans in 2016 was $124,500 in Dalton. These loans were for the purchase of an owner-occupied, one-to-four family dwelling, as reported by HMDA.

Median Amount of Purchase Loans

Median Amount of Purchase Loans													
	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Dalton, GA (City, 2010) **and** Dalton, GA (City, 2000)	$110,500	$120,000	$118,000	$112,000	$114,000	$97,000	$109,000	$91,000	$111,500	$117,000	$125,000	$124,000	$124,500

Source: Policy Map, https://www.policymap.com/tables
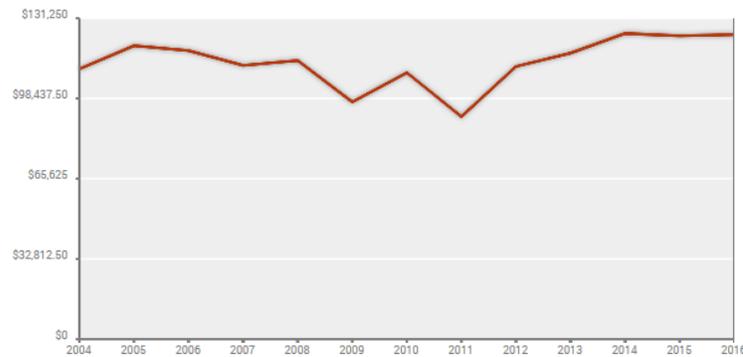
For the purposes of the AI, analysis of home lending data will be confined to trends in home purchase loans, and specifically "owner-occupied" home purchase loans. These loans, which are intended to finance the purchase in which the owner intends to live, provide the best index available in these data of the ability of homebuyers and prospective homebuyers to choose where they will live. More than 85% of all loan originations in 2016 were made to Whites, while only 3.3% of loans were made to African Americans.

Percent of Purchase Loans Originated to Whites, 2016

	Percent of Loans that were made to White Borrowers												
	✕ 2004	✕ 2005	✕ 2006	✕ 2007	✕ 2008	✕ 2009	✕ 2010	✕ 2011	✕ 2012	✕ 2013	✕ 2014	✕ 2015	✕ 2016
Dalton, GA (City, 2010) **and** Dalton, GA (City, 2000)	83.51%	85.98%	85.05%	88.48%	90%	88.26%	89.91%	88.32%	85.29%	89.75%	84.25%	84.86%	85.45%
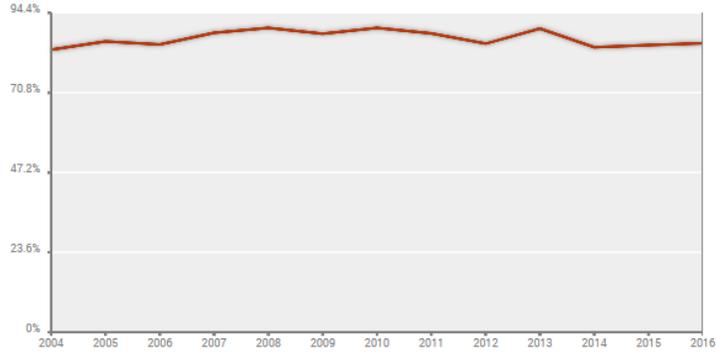
Percent of Purchase Loans Originated to African Americans, 2016

	Percent of Purchase Loans that were made to Black Borrowers												
	✕ 2004	✕ 2005	✕ 2006	✕ 2007	✕ 2008	✕ 2009	✕ 2010	✕ 2011	✕ 2012	✕ 2013	✕ 2014	✕ 2015	✕ 2016
Dalton, GA (City, 2010) **and** Dalton, GA (City, 2000)	2.66%	2.72%	3.02%	0	2.6%	1.22%	6.12%	4%	6.25%	3.19%	2.47%	0.85%	3.39%

Source: Policy Map, https://www.policymap.com/tables
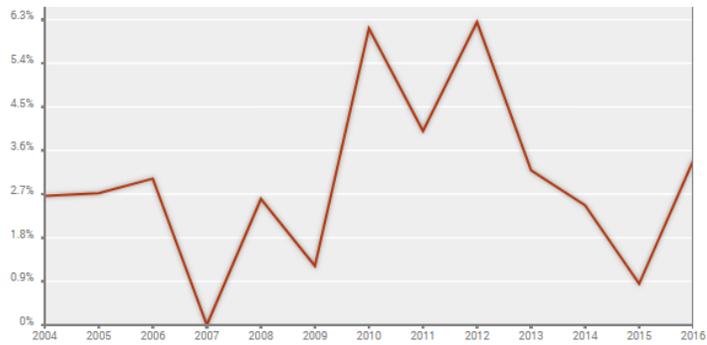
HMDA provided the disposition of various types of loan products at the Census Tract level, which were extracted and displayed for each individual tract that comprises the City of Dalton. These tracts were analyzed to identify those whose median income (in relation to the MSA) fell below that of the City as a whole, and those with a significantly higher minority concentration than the citywide rate. Specifically, data was analyzed pertaining to the disposition of loan applications by the minority and income characteristics of the census tract in which the subject property of the loan was located to identify if there were any discernible patterns that might suggest discriminatory lending practices based on race.

For purposes of this analysis, a "minority" tract is defined as a census tract where the minority concentration is at least 5% greater than that of the City of Dalton as a whole. In order to accurately portray HMDA data for the City, only those tracts that were either entirely within the City or whose area fell predominantly within City boundaries were utilized. Certain tracts where only a small area fell within the City boundaries were excluded from the calculations. It should be noted, discriminatory lending practices cannot be definitively identified by correlation of HMDA data elements; however, the data can display real patterns in lending to indicate potential problem areas. HMDA data is available for the three-year period, the most recent years, 2015-2017.

Loans Purchased, By Location of Property and Type of Loan, 2017

	Loans on 1- to 4-Family and Manufactured Home Dwellings							
	Home Purchase Loans							
	FHA, FSA/RHS & VA		Conventional		Refinancing		Home Improvement Loans	
	A		B		C		D	
CENSUS TRACT/COUNTY NAME/TRACT NUMBER)	Number	$000's	Number	$000's	Number	$000's	Number	$000's
GA/Whitfield County/0001.01	9	1418	3	771	10	1650	0	0
GA/Whitfield County/0001.02	29	4019	14	2815	10	1286	2	586
GA/Whitfield County/0002.00	13	1439	2	351	3	305	0	0
GA/Whitfield County/0003.01	11	1388	4	469	7	890	0	0
GA/Whitfield County/0003.02	19	2192	5	646	7	1000	3	315
GA/Whitfield County/0004.00	8	894	6	355	1	177	0	0
GA/Whitfield County/0005.01	8	909	3	728	4	516	0	0
GA/Whitfield County/0005.02	7	712	0	0	2	147	0	0
GA/Whitfield County/0006.00	11	1260	1	166	1	69	0	0
GA/Whitfield County/0007.00	22	2621	5	1197	3	303	0	0
GA/Whitfield County/0008.00	23	3124	6	1174	8	1137	0	0
GA/Whitfield County/0009.00	6	1052	4	823	0	0	0	0
GA/Whitfield County/0010.00	2	236	0	0	0	0	0	0
GA/Whitfield County/0011.00	6	635	1	162	0	0	0	0
GA/Whitfield County/0012.00	15	1738	2	137	1	189	1	82
GA/Whitfield County/0013.00	2	243	2	326	0	0	0	0
GA/Whitfield County/0014.00	8	1122	5	657	9	1547	0	0
GA/Whitfield County/0015.00	22	2880	4	644	5	662	0	0
TOTALS	221		67		71		6	

Source: FFIEC Mortgage Reports, https://ffiec.cfpb.gov/data-publication/aggregate-reports/2017/GA/19140/2

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

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

Among the tracts analyzed, there were 365 loan applications submitted for purchase, refinancing, improvement of owner-occupied homes, and FHA/VA loans. Of this total, 306 (83.3%) of all applications were denied. Our analysis will focus largely on the characteristics of those applications that were denied.

Reasons for Denial of Loan Applications by Race, Ethnicity, Gender and Income of Applicant, 2017

APPLICANT CHARACTERISTICS	Debt-to-Income Ratio Number	%	Employment History Number	%	Credit History Number	%	Collateral Number	%	Insufficient Cash Number	%	Unverifiable Information Number	%	Credit App. Incomplete Number	%	Mortgage Insurance Denied Number	%	Other Number	%	Total Number	%	Number	%
RACE																						
American Indian/Alaska Native	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	100	1	100	1	100
Asian	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Black or African American	0	0	0	0	1	50	0	0	0	0	0	0	1	50	0	0	0	0	2	100	2	100
Native Hawaiian or Other Pacific Islander	1	100	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	100	1	100
White	9	16	3	5	14	25	9	16	4	7	5	9	5	9	0	0	6	10	55	100	55	100
2 or more minority races	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Joint (White/Minority Race)	0	0	0	0	0	0	0	0	0	0	0	0	1	100	0	0	0	0	1	100	1	100
Race Not Available	0	0	0	0	2	33	3	50	1	16	0	0	0	0	0	0	0	0	6	100	6	100
ETHNICITY																						
Hispanic or Latino	2	11	0	0	3	16	3	16	3	16	3	16	2	11	0	0	2	11	18	100	18	100
Not Hispanic or Latino	8	18	3	6	13	29	6	13	2	4	2	4	5	11	0	0	5	11	44	100	44	100
Joint (Hispanic or Latino/Not Hispanic or La	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Ethnicity Not Available	0	0	0	0	1	25	3	75	0	0	0	0	0	0	0	0	0	0	4	100	4	100
MINORITY STATUS																						
White Non-Hispanic	8	19	3	7	11	26	6	14	2	4	2	4	4	9	0	0	5	12	41	100	41	100
Others, Including Hispanic	1	100	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	100	1	100
GENDER																						
Male	6	16	2	5	11	30	5	13	3	8	4	11	2	5	0	0	3	8	36	100	36	100
Female	3	14	1	4	3	14	4	19	2	9	1	4	4	19	0	0	3	14	21	100	21	100
Joint (Male/Female)	1	20	0	0	2	40	0	0	0	0	0	0	1	20	0	0	1	20	5	100	5	100
Gender Not Available	0	0	0	0	1	25	3	75	0	0	0	0	0	0	0	0	0	0	4	100	4	100
INCOME																						
Less than 50% of MSA/MD median	2	50	0	0	0	0	0	0	0	0	1	25	0	0	0	0	1	25	4	100	4	100
50-79% of MSA/MD median	4	18	2	9	6	27	4	18	2	9	2	9	1	4	0	0	1	4	22	100	22	100
80-99% of MSA/MD median	2	14	0	0	4	28	1	7	2	14	1	7	2	14	0	0	2	14	14	100	14	100
100-119% of MSA/MD median	0	0	0	0	3	42	1	14	1	14	0	0	1	14	0	0	1	14	7	100	7	100
120% or more of MSA/MD median	2	11	1	5	4	22	6	33	0	0	1	5	2	11	0	0	2	11	18	100	18	100
Income Not Available	0	0	0	0	0	0	0	0	0	0	0	0	1	100	0	0	0	0	1	100	1	100

Source: FFIEC Mortgage Reports, https://ffiec.cfpb.gov/data-publication/aggregate-reports/2017/GA/19140/8-1

Income characteristics for denials do not necessarily suggest discriminatory practices based on low income level but could mean that lower income households may be facing other challenges such as creditworthiness, low paying jobs, and higher debt and are unable to qualify for a loan. The concern about these challenges increase with the fact that Dalton's low income tracts have a high minority population.

Overall, the data indicates that the elevated denial rate among tracts appears to be based on the income and racial/ethnic characteristics of the tract. The HMDA data also suggests that there may be discriminatory lending based on race/ethnicity of property location within the City of Dalton as well as income characteristics. A definitive conclusion would require a greater degree of analysis taking into consideration additional data not available from HMDA at the geographic level specific to the City of Dalton.

FAIR HOUSING COMPLAINTS

Fair Housing Enforcement, Outreach Capacity, and Resources
The Federal Fair Housing Act refers to Title VIII of the Civil Rights Act of 1968. This Act protects individual's right to rent an apartment, buy a home, obtain a mortgage, or purchase homeowners insurance free from discrimination based on: race, color, national origin, religion, sex, familial status, and disability.

Typically, fair housing services for renters and homebuyers include the investigation and resolution of housing discrimination complaints, discrimination auditing/testing, and education and outreach, including the dissemination of fair housing information such as written material, workshops, and seminars. Tenant/landlord counseling is another fair housing service that involves informing landlords and tenants of their rights and responsibilities.

Every year, the National Fair Housing Alliance releases a report on trends in fair housing, including the most recent data on reported instances of housing discrimination in America. The 2018 Fair Housing Trends Report, provides a detail history of policies and practices of segregated communities and explores alternatives to combat housing discrimination. The report also provides recent data on fair housing complaints from private fair housing centers, Department of Justice (DOJ), HUD, and Fair Housing Assistance Program (FHAP) agencies. Highlights of this data include:

- More than half a million housing discrimination complaints have been processed since 1996, when NFHA first began collecting complaint data.

- Since 1991, more than 70,000 units of multi-family housing have been made accessible to persons with disabilities through litigation brought primarily by DOJ and private, nonprofit fair housing organizations.

- There were 28,843 complaints of housing discrimination in 2017.

- The three most common types of complaints in 2017 were based on disability (57 percent), race (19 percent), and family status (9 percent).

Disability-based discrimination is easier to detect because it is typically blatant and as such is reported at higher levels than other types of discrimination, which occur more subtly and are less often recognized.

Fair Housing Agency Complaints
HUD's Office of Fair Housing and Equal Opportunity (FHEO)
Complaints alleging housing discrimination can be filed at the Federal and State level. At the Federal level complaints can be filed with the HUD Office of Fair Housing and Equal Employment Opportunity (FHEO). FHEO administers the Fair Housing Assistance Program (FHAP) which awards and manages the Fair Housing Initiatives Program grants and proposes fair housing legislation. Complaints can be submitted to the central HUD office or to regional field offices located in each state.

Individuals who believe they are victims of housing discrimination can choose to file a fair housing complaint through the respective Regional FHEO. Typically, when a complaint is filed with the agency, a case is opened and an investigation of the allegations of housing discrimination is reviewed. If the complaint is not successfully mediated, the FHEO determines whether reasonable cause exists to believe that a discriminatory housing practice has occurred. Where reasonable cause is found, the parties to the complaint are notified by HUD's issuance of a "Determination", as well as a "Charge of Discrimination", and a hearing is scheduled before a HUD administrative law judge. Either party [complainant or respondent] may cause the HUD-scheduled administrative proceeding to be terminated by electing instead to have the matter litigated in Federal court.

Region IV of the Office of Fair Housing and Equal Opportunity (FHEO) receives complaints by households regarding alleged violations of the Fair Housing Act for cities and counties throughout Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, South Carolina, and Tennessee. The mission of the FHEO is to protect individuals from employment, housing, and public accommodation discrimination, and hate violence. To achieve this mission, the FHEO maintains databases of and investigates complaints of housing discrimination, as well as complaints in the

areas of employment, housing, public accommodations, and hate violence. According to HUD FHEO no complaints have been filed in the last five years for the City of Dalton.

Section 504 Compliance

Section 504 of the Federal Rehabilitation Act of 1973 prohibits discrimination based on disability in any program receiving Federal financial assistance. This includes provisions for providing reasonable modifications in all rules, policies, and procedures. Programs must be readily accessible to and useable by individuals with disabilities. Major alterations or construction of dwelling units must provide at least 5percent of units accessible to people with mobility impairments and at least 2 percent of units accessible to people with visual or hearing impairments. There were no recorded Section 504 complaints filed for Dalton from January 1, 2017 to December 31, 2017.

Hate Crime Data

Fair housing violations due to hate crimes occur when people will not consider certain neighborhoods, or have been run off from their homes for fear of harassment or physical harm. To a certain degree, hate crimes can also be an indicator of discrimination. The Georgia Hate Crimes Act, Chapter 411.046 of the Georgia Government Code, defines hate crimes as crimes that are motivated by prejudice, hatred, or advocacy of violence including, but not limited to, incidents for which statistics are or were kept under Public Law 101-275 (the Federal Hate Crimes Statistics Act). The federal law further defines Hate Crime as crimes that manifest evidence of prejudice based on race, ethnicity, sexual orientation, religion, disability, gender and gender identity. In an attempt to determine the scope and nature of hate crimes, the Federal Bureau of Investigation (FBI) Hate Crime Statistics Program collects statistics on these incidents.

A review of the data available through the Hate Crime Statistics Program between 2013 through 2017 Program revealed there were no incidents of hate crimes in Dalton in the last five years.

Impediments & Suggested Actions

The City of Dalton has identified impediments to fair housing choice and recommendations for specific actions that the City could take to reduce or remove those impediments. This section will review any current impediments identified through this 2019 study, discuss the issues related to the impediments and their impact on members of the protected classes and the community, and provide recommendations to the City.

The recommendations will consist of both reactive and proactive actions to address the impediments and ultimate acceptance and implementation of any or all recommendations will be done by the City's governing Council. This section will also review the impediments and action plan identified in the City's prior 2014 AI and the status of fair housing activities and whether the impediments then still need addressing.

One of the main implications of the July 2013 Proposed Fair Housing Rule is more of a focus on "affirmatively furthering fair housing" activities in the Consolidated Plan process. Fair housing planning will become one of the factors in setting Consolidated Plan priorities and how resources are to be committed including fair housing activities. Many of the recommendations contained in this report are based on a proactive or "affirmative" approach that reflects the goals and objectives of the proposed Fair Housing Rule up to its becoming a final rule.

In order to develop a viable implementation plan, the City may view the recommendations as a framework for addressing the impediments and a guide to facilitate further community dialogue, research, feasibility testing, and fair housing action planning.

Update to 2014 Previous Impediments and Recommendations

The City of Dalton's 2014 AI identified two (2) impediments to fair housing choice and provided recommendations for specific actions that the City could take to reduce or remove those impediments. This section will review the impediments and action plan identified in the City's 2014 AI and the status of those impediments.

Previous Impediment #1: Lack of Public Transportation

Planned Action/Goal #1: Continue to work with Whitfield review transportation planning efforts to advocate public infrastructure improvements that align with the goal of expanding of expanding housing choice.

Timeline: Annually, beginning FY 2014

Current status: The City is currently maintaining its efforts to review transportation planning for with the County.

Updated Recommendation(s): This impediment will continue to be addressed with the actions of the City and communication efforts will be maintained in the future.

Previous Impediment #2: Lack of Fair Housing Education

Planned Action/Goal #2: Annually reserve a portion of CDBG public service funding to be awarded as a competitive Fair Housing Grant to an organization that will carry out a comprehensive fair housing testing program in the City.

Timeline: Annually, beginning FY 2014

Current status: The City has awarded previous CDBG public service funds to local organizations to undertake Fair Housing Activities.

Updated Recommendation(s): This impediment has been addressed with the actions of the City. However, it is recommended that these activities should be held annually in the future.

Current 2019 Impediments and Recommendations

Impediment 1: Lack of affordable housing for Dalton residents.

Action: Increase the production and preservation of affordable housing units.

Recommendation
The City should increase the supply of affordable housing for renters and homeowners by supporting the development of inclusive housing projects by leveraging federal, state, and local public funding with private sector funding.

Status: The review of CHAS data and an analysis of housing affordability in the City of Dalton indicates that there is a shortage in the supply of affordable housing units for both owners and renters and that minorities are disproportionately impacted by housing cost burden as a result of economic pressures and other external conditions. In recent years, public funding, including CDBG funds have been declining and in order to increase the number of affordable housing units, the City shall work towards leveraging, as much as possible, with private sector funds and other government funds to increase the variety and affordability of housing suitable for different types of households.

Impediment 2: Inadequate fair housing education and awareness in community, especially for underrepresented and minority populations with Limited English Proficiency (LEP).

Action: Continue fair housing education and outreach and expand opportunities for fair housing training for underrepresented populations such as Asian Americans, persons with disabilities including the hearing impaired, the Lesbian, Gay, Bisexual, and Transgender (LGBT) community, and persons with LEP.

Recommendation

The City of Dalton should expand its fair housing education and outreach efforts to groups that are underrepresented in its pool of clients to help continue to keep the public informed of their rights and specifically targeting more efforts in minority areas.

Status: As part of the AI process, the City sought the input from several minority populations that are underrepresented groups. The City has also increased its outreach to minority populations especially persons of Hispanic/Latino ethnicity and the elderly. The City will also continue to increase education and awareness of the CDBG Program through partnerships with agencies that represent individuals and families with LEP.