



# **Analysis of Impediments to Fair Housing Choice**

**Hialeah, Florida**

**2015-2019**

## Table of Contents

<b>Executive Summary.....</b>	<b>4</b>
<b>Introduction.....</b>	<b>6</b>
Period Covered .....	8
Data and Resources.....	8
<b>Citizen Participation Process.....</b>	<b>9</b>
<b>City of Hialeah Community Profile .....</b>	<b>11</b>
<b>Demographic and Economic Profile.....</b>	<b>12</b>
Population .....	12
Age.....	14
Elderly .....	15
Age Dependency Ratios.....	18
Race and Ethnicity .....	19
Diversity.....	23
Disability .....	25
Income .....	29
Income and Race .....	30
Poverty .....	32
Poverty and Race.....	34
Employment .....	36
Transportation.....	39
Veterans .....	41
<b>Housing Profile.....</b>	<b>43</b>
Housing Type & Size .....	43
Housing Unit Size.....	44
Housing Conditions .....	45
Housing Occupancy Characteristics .....	47
Construction Activity .....	49
Housing Market and Demand .....	50
Housing Costs .....	52
Housing Affordability.....	56
Property Tax and Insurance .....	62
Public Housing .....	62
<b>Home Mortgage Disclosure Act Reporting (HMDA) .....</b>	<b>64</b>
<b>Lending Practices .....</b>	<b>64</b>
<b>High Cost Loans .....</b>	<b>70</b>
<b>Community Reinvestment Act .....</b>	<b>73</b>
<b>Fair Housing Complaints .....</b>	<b>76</b>
<b>Fair Housing Lawsuits Filed .....</b>	<b>79</b>
<b>Effect of Land Use Planning Policies and Regulations on Fair Housing Choice in Hialeah.....</b>	<b>80</b>
<b>Comprehensive Plan – Housing Element and Future Land Use Element .....</b>	<b>80</b>
<b>Land Development Code.....</b>	<b>82</b>

<b>Zoning Code .....</b>	<b>83</b>
<b>Equal Opportunity/Affirmative Fair Housing Marketing Procedures for the HOME program .....</b>	<b>85</b>
<b>Affirmative Fair Housing Marketing Plan .....</b>	<b>86</b>
<b>Local Housing Assistance Plan .....</b>	<b>87</b>
<b>Reasonable Accommodation Policy and Procedures .....</b>	<b>88</b>
<b>Public Housing Admission and Continued Occupancy Policy .....</b>	<b>89</b>
<b>2010-2014 Analysis of Impediments: Findings, Recommendations and Actions .....</b>	<b>90</b>
Goal 1. Reduce the Incidence of Housing Discrimination.....	90
Goal 2. Educate the Community about its Fair Housing Rights and Responsibilities .....	90
Goal 3. Reduce Discriminatory and Abusive Practices in Lending.....	91
Goal 4. Continue to Provide More Affordable Housing.....	91
<b>Conclusion: Findings and Recommendations .....</b>	<b>94</b>
Fair Housing Related Impediments .....	94
Affordable Housing Related Impediments.....	94
Fair Housing Action Plan.....	96
<b>Exhibit 1: Online English and Spanish Survey Results.....</b>	<b>99</b>

## Executive Summary

In March 2015 the City of Hialeah, Florida contracted with the Florida Housing Coalition to conduct an Analysis of Impediments to Fair Housing Choice. The Florida Housing Coalition, Inc., is a nonprofit, statewide membership organization whose mission is to bring together housing advocates and resources so that all Floridians have a quality affordable home and suitable living environment. The Coalition provides information, training and technical assistance on affordable housing and related issues; supports community-based partnerships in leveraging resources; and advocates for policies, programs and use of funding resources that maximize the availability and improve the quality of affordable housing in Florida.

The City of Hialeah, incorporated in 1925, is located within Miami-Dade County, Florida. Hialeah has an area of approximately 21 square miles, and its population in 2010 was 224,669. The City is located in the heart of northwest Miami-Dade County with access to all major thoroughfares. The Florida Housing Data Clearinghouse (FHDC) estimates that the population will increase to 234,790 by 2020.

Hialeah is also one of the largest Spanish speaking communities in the country. Over 94% of residents are Hispanic or Latino, providing a welcoming environment for immigrants of Latin descent to settle and bring their traditions and customs. It is estimated that 74% of Hialeah's Hispanic population is of Cuban descent, making it the City with the highest percentage of Cuban residents of any City in the United States.

The City has a Strong Mayor form of government with legislative authority vested in a 7 member governing council. Over 81% of businesses are Hispanic owned with over 26% of businesses owned by women. The city includes a well-known historic site known as the Hialeah Park Race Track. This historic site has over 220 square acres. This site is under renovation, and construction of an entertainment complex is planned.

Hialeah recently annexed three square miles known as Hialeah Heights. This area lies in the northwest section of the City and is being developed to include both residential and commercial areas.

Hialeah had a median single-family home value of \$161,200 in 2013, and a median home sale price of \$92,000. Median gross rents averaged \$989 in 2013, with a plurality of households paying between \$1,000 and \$1,499 in rent.

In 2013, 44,901 households in Hialeah (61%) were paying more than 30% of their incomes for housing, in comparison to 43% of household being cost burdened statewide. Additionally, over 1,300 units in Hialeah lacked complete plumbing or kitchen facilities, and the rental vacancy rate was relatively low (3.2%).



These factors have several impacts on the housing choices available to residents:

1. The lack of adequate affordable housing is an impediment to fair housing choice.
2. The inability of households to pay rent and utilities without sacrificing other basics needs greatly impacts the life of lower income households.
3. The low rental vacancy rate limits the availability of housing. These low vacancy rates mean that landlords can be more selective in choosing tenants. This also increases the chances of property being managed by slumlords.
4. The high cost of taxes and insurance also impacts the ability of low- and moderate-income households to purchase their first homes. Homeowner association fees and mortgage insurance premiums also impact the ability of households to afford to purchase a home with the City limits.
5. A large Hispanic immigrant population, including a high percentage of Hispanic landlords, requires increases in education of federal, state and local fair housing laws.
6. Marketing must be done by the City to encourage participation in their housing programs from those least likely to apply.

### **Identified Impediments**

A review of data, citizen participation responses and current policies and procedures identified the following impediments for fair housing choice:

Finding 1: Lack of awareness by residents of fair housing laws and where to file complaints.

Finding 2: Lack of adequate data to determine fair housing violations and complaints within the City.

Finding 3: Outdated City policies on affirmatively furthering fair housing choice.

Finding 4: Lack of awareness by stakeholders and the public about the new adopted Miami-Dade County Anti-Discrimination Ordinance that expands the protected classes by prohibiting discrimination based on status as a victim of domestic violence, dating violence or stalking; including source of income as a protected classification in housing; and prohibiting discrimination in housing, public accommodations, and employment based on gender identity or gender expression.

### **Affordable Housing Related Impediments**

Finding 5: Insufficient supply of affordable rental housing.

Finding 6: Insufficient supply of affordable housing for purchase by low and moderate income families.

The City staff will undertake efforts during the next five years to address these identified impediments to fair housing choice and implement the recommendations that will help to overcome the barriers identified. Meeting this goal requires a concerted effort, which includes city staff, stakeholders, for profit and non-profit partners.

## Introduction

Fair Housing and Equal Opportunity for all persons encompasses the spirit and diversity of our country. Fair housing laws help to ensure that all groups—including minorities, immigrants, families with children, and those with disabilities—are afforded the same access and rights to housing.

The Department of Housing and Urban Development (HUD) enforces the Federal Fair Housing Act. Section 808(e)(5) of the Fair Housing Act requires the Secretary of HUD to administer the Department's housing and urban development programs in a manner to "affirmatively further fair housing (AFFH)."

HUD carries out this obligation by requiring HUD grantees to affirmatively further fair housing as part of the Consolidated Planning Process for Community Planning and Development (CPD) Programs: the Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), Emergency Solutions Grant (ESG), and Housing Opportunities for Persons with AIDS (HOPWA). Through its CPD programs, HUD's goal is to expand mobility and widen a person's freedom of choice. This Act prohibits discrimination in the sale and rental of housing. Discrimination by landlords, realtors, and lenders based on race, color, religion, sex, familial status, or disability is a violation of federal law.

The AFFH responsibilities require the local government to:

1. Conduct an Analysis of Impediments (AI) to Fair Housing Choice within the jurisdiction;
2. Take appropriate actions to overcome the effects of any impediments identified through the AI; and
3. Maintain records reflecting the analysis and actions taken in this regard.

The objectives for the jurisdiction should include promoting fair housing choice for all persons, providing housing opportunities for all persons regardless of race, color, religion, sex, familial status, disability and national origin, as well as promoting Fair Housing Act compliance among landlords, realtors, and lenders.

In 2013, HUD published a proposed rule that will require entitlement jurisdictions to prepare an Assessment of Fair Housing (AFH) and encourage incorporation of fair housing considerations in local and regional planning, with the goals of eliminating barriers to fair housing choice and promoting desegregation and deconcentration of poverty. Though similar to the Analysis of Impediments currently required, the AFH will provide a structure to analyze HUD-provided data, other local and regional data, and community input. At the time that this Analysis of Impediments was developed, HUD had not made this rule final.

The Florida Building Code, with a 2014 draft currently under public review, provides specific instructions on the legal requirements of making buildings accessible.

Chapter 760 of Florida Statutes states that “it is against the law to discriminate in the sale, rental, financing, appraisal, or insuring of housing, in the provision of real estate brokerage service, or in the advertising of a dwelling on the basis of race, color, religion, sex, national origin, handicap or familial status (families with children under 18, pregnant women and people securing custody of children under 18). Steering and blockbusting are also illegal. In addition, it is against the law to fail to design and construct new multi-family housing in an accessible manner, or to refuse certain modifications or accommodations to persons with a mental or physical disability.”

On September 3 2014, the Miami-Dade County Board of County Commissioners was presented with Ordinance 14-113, prohibiting discrimination based on status as a victim of domestic violence, dating violence or stalking, and including source of income as a protected classification in housing. The Ordinance updated the County’s non-discrimination policy as follows: “[The] policy of Miami-Dade County, in the exercise of its police power for the public safety, health and general welfare, to eliminate and prevent discrimination in employment, family leave, public accommodations, credit and financing practices, and housing accommodations because of race, color, religion, ancestry, national origin, sex, pregnancy, age, disability, marital status, familial status, sexual orientation, or actual or perceived status as a victim of domestic violence or stalking. It is further hereby declared to be the policy of Miami-Dade County to eliminate and prevent discrimination in housing based on source of income.” This ordinance is in effect.

On September 16, 2014, the Miami-Dade County Board of County Commissioners was presented with an Ordinance amending Chapter 11A to Prohibit Discrimination in Housing, Public Accommodations, and Employment Based on Gender Identity or Gender Expression. The policy aims to “eliminate and prevent discrimination in employment, family leave, public accommodations, credit and financing practices, and housing accommodations because of race, color, religion, ancestry, national origin, sex, pregnancy, age, disability, marital status, familial status, gender identity, gender expression, or sexual orientation. It is further hereby declared to be the policy of Miami-Dade County to eliminate and prevent discrimination in housing based on source of income.” The ordinance is in effect.

This document will serve as a comprehensive review of the federal, state and City laws, regulations and administrative policies, procedures and practices. It will assess how these laws, regulations, policies, and procedures affect the location, availability, and accessibility of housing. It will also assess how conditions, both private and public, affect fair housing choice.

The City of Hialeah understands its responsibilities under the fair housing laws and continues to work to ensure that it provides fair housing choice in the administration of its programs and services. The City will take appropriate action to overcome any identified impediments.

## Period Covered

The City of Hialeah conducted its last Analysis of Impediments to Fair Housing Choice in 2010. This document is being developed in conjunction with the City of Hialeah Five Year Consolidated Plan, and both documents will be in effect from October 1, 2015 to September 30, 2019.

## Data and Resources

This document was prepared following HUD's Fair Housing Guide as a tool to help guide its content and format. The document also references documents and websites that provide important information necessary for its development. These documents and resources include, but are not limited to:

- City of Hialeah 2010-2014 Analysis of Impediments to Fair Housing Choice
- City of Hialeah 2010-2014 Consolidated Plan
- City of Hialeah 2015-2019 Consolidated Plan
- City of Hialeah 2014 CAPER
- HUD CHAS data
- American Community Survey Data
- Shimberg Center for Housing Studies (University of Florida) Data
- Home Mortgage Disclosure Act Data

## Citizen Participation Process

As part of the Citizen Participation process, the City of Hialeah employed several methods to gather comments and obtain input from City of Hialeah residents, employees, employers and stakeholders:

1. A public meeting was held on April 7, 2015 from 6:05 PM to 6:25 PM at Goodlet Park, Hialeah, FL.
2. A public Stakeholder meeting was held on April 30, 2015 from 10:05 AM to 11:05 AM in City Hall. Comments are summarized below, edited for clarity:
  - a. While the Point in Time Count of January 2015 reveals a fairly small homeless population, and the City does fund rapid rehousing and a safe haven, the City should set aside funds for permanent supportive housing for chronically homeless. Youth, family and veteran's homeless housing and programs should be expanded.
  - b. Increase the amount of office space for business incubator programs.
  - c. More resources should be focused on employment and job training.
  - d. More housing and housing funds should be targeted to extremely low income households than to very low and low-income households. There is a need for large low-income families, but there are not enough large rental units.
  - e. Purchase assistance should be funded so that low-income households have the opportunity to buy a home.
  - f. Two Community Oriented Police officer (COP) positions should be funded so that law enforcement is better able to refer citizens to available community resources. In addition, the COP should be based in a recently annexed area off I-75 that currently has no police presence.
  - g. The City should consider increasing the legally required notice given to tenants prior to eviction from 15 days to 30 days. The City of Miami Beach has done this and has found the additional time has decreased homelessness and the use of homeless resources.
3. The City of Hialeah conducted an online survey in English from March 30 to May 7, 2015, and in Spanish from March 31 to May 7, 2015. The survey was made available on the City of Hialeah's website and Facebook page. Postcards with the web link were distributed throughout various locations including City Hall, parks and recreation lobbies, and stakeholder and non-profit service provider offices.

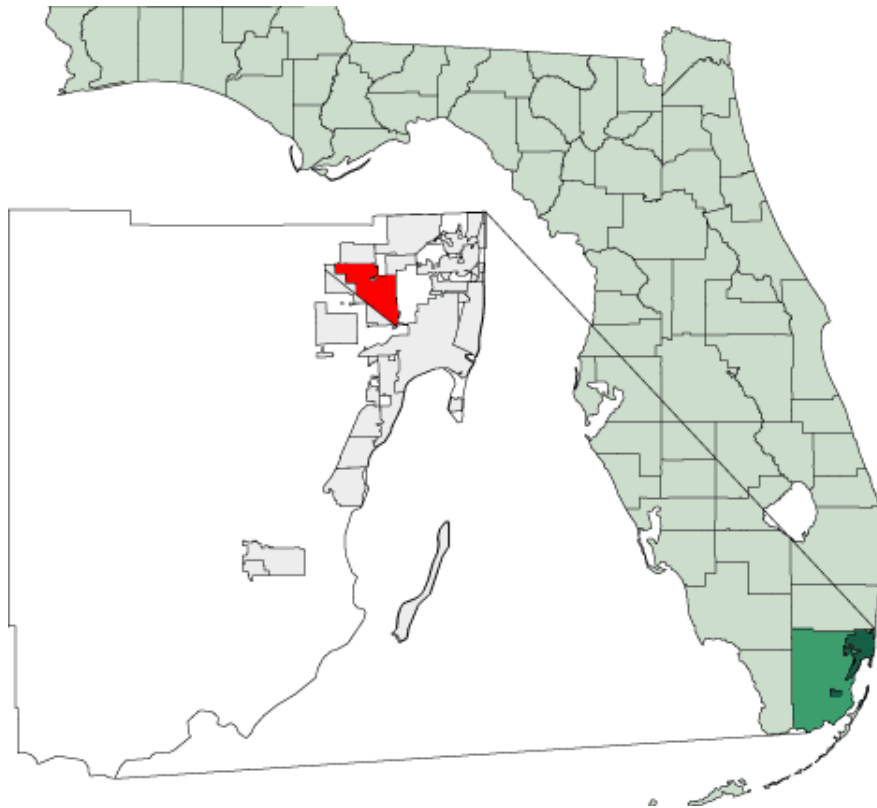
This survey included a request for input on the City of Hialeah's use of federal and state funding to meet the needs of its very low and low-income residents. The survey also requested input on fair housing issues. The survey and survey results are attached as Exhibit 1, and a summary of responses is provided below.

Below is a summary of some of the survey responses that impact policy decisions on fair housing in the community:

<b>Percentage</b>	<b>Response summary</b>
<b>34.48%</b>	Respondents between the ages of 21-35.
<b>79.31%</b>	Respondents that live in Hialeah.
<b>70.83%</b>	Respondents that were property owners.
<b>68.97%</b>	Respondents that do not work in the City.
<b>44.83%</b>	Felt that discrimination was somewhat rare in their community.
<b>13.79%</b>	Felt that discrimination was extremely common in their community.
<b>11.11%</b>	Felt that the most common form of discrimination was race and/or disability.
<b>85.71%</b>	Had not experienced and did not know someone who had experienced discrimination in the City of Hialeah.
<b>16%</b>	Had experienced discrimination or knew someone that had experienced discrimination in the rental of housing.
<b>0%</b>	Had experienced or know someone who had experienced discrimination in the purchase of housing.
<b>60%</b>	Those that responded yes to the question above stated that the discrimination was based on familial status.
<b>34.62%</b>	Did not know where to file a fair housing complaint.
<b>50%</b>	Did not know if the fair housing laws were being adequately enforced in the City of Hialeah.
<b>39.29%</b>	Would use the internet to get questions answered on fair housing laws.
<b>68.97%</b>	Had not heard of fair housing violations within the City of Hialeah.
<b>51.72%</b>	Did not know of specific neighborhoods that have fair housing problems.

## City of Hialeah Community Profile

Hialeah is located in Miami-Dade County and is a major municipality within the greater Miami metropolitan area. It is the 6th largest city in the state of Florida and is unique as it has one of the largest Spanish-speaking communities in the country, primarily from Cuban and Cuban American residents. In this section we examine the community profile of Hialeah.



The goal of the community profile is to paint a picture of the current demographic, economic, and housing framework of Hialeah in order to aid decision makers in affirmatively furthering fair housing. The community profile is divided into two key sections: the Demographic and Economic Profile, and the Housing Profile. The Demographic and Economic profile looks at the city from the perspective of its people – exploring variables such as race and ethnicity, age, disability status, income, employment, and poverty. The Housing Profile looks at the city’s housing stock from various angles such as home values, rents, housing cost burden, vacancy, and substandard housing to provide a snapshot of the physical environment in which Hialeah’s people live. Together these pieces provide a data-driven snapshot of the city that will empirically ground fair housing planning efforts.

## Demographic and Economic Profile

### Population

The current population of the City of Hialeah is 228,943, according to 2009-2013 American Community Survey 5-Year Estimates. This represents just a 1.1% growth since 2000, which is less than the countywide growth rate for the same period of 13.1%. The data table below details population change in Hialeah and Miami-Dade County between 2000 and 2013.

<b>TABLE: Population - 2000 to 2013</b>			
	<b>2000</b>	<b>2013</b>	<b>% Change 2000-2013</b>
Hialeah	226,419	228,943	1.1%
Miami-Dade County	2,253,362	2,549,075	13.1%
Source: 2000 Census, 2009-2013 ACS			

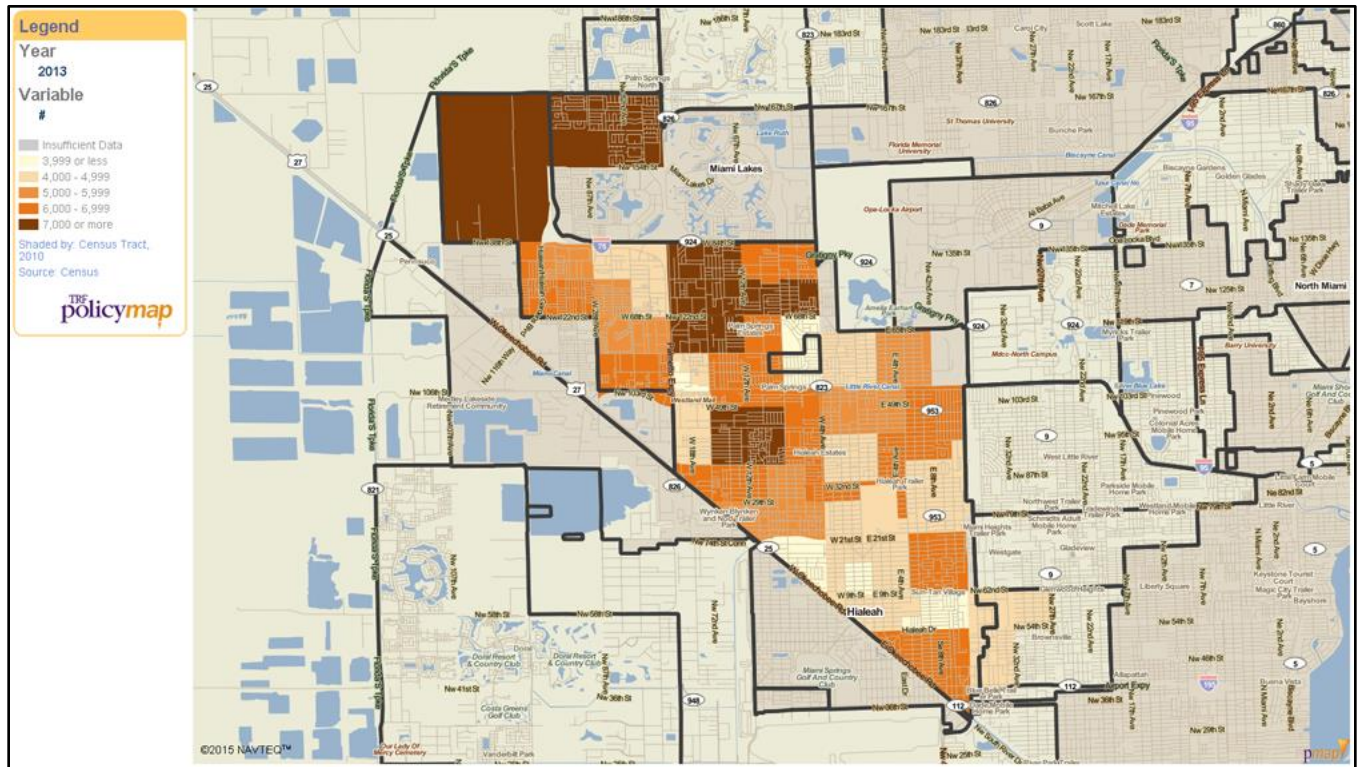
As reported in the city's previous Analysis of Impediments to Fair Housing Choices in 2010, the city saw a major increase in the population during the 1990's, and it was projected by the Florida Housing Data Clearinghouse (FHDC) that the city's population would continue a trend of increased population growth from 2010 to 2015 and then finally a population of 291,876 in 2030. Since then, the population of Hialeah has slowed to 1.1 percent growth and the FHDC has revised its figures to reflect this trend.

<b>TABLE: Projected Total Population, Hialeah, 2010 - 2030</b>				
	<b>2010</b>	<b>2015</b>	<b>2020</b>	<b>2030</b>
Hialeah	224,669	230,905	234,790	240,217
Source: Florida Housing Data Clearinghouse				



The following map geographically displays the distribution of the population throughout the city. Lighter colored shades represent areas with lower populations and darker shades represent areas with higher populations.

## MAP: Population



## Age

Hialeah is experiencing a similar demographic shift towards an older population as the county and state. According to the Census 2000 the median age in Hialeah was 37.7 years of age in 2000 and increased to 42.6 years of age in 2013. This represents a 13 percent increase in that time period. Over the same period median age in the county increased 8.2 percent, increasing 35.6 years of age to 38.5 years of age. The table below breaks down population data by age cohort for Hialeah. (Source: 2009-2013 American Community Survey 5-Year Estimates)

<b>TABLE: Hialeah Age Distribution</b>		
<b>Age Cohort</b>	<b>Number of People in Age Group</b>	<b>Percent of People in Age Group</b>
Under 5 years	10,894	4.8%
5 to 9 years	10,705	4.7%
10 to 14 years	11,591	5.1%
15 to 19 years	14,403	6.3%
20 to 24 years	15,203	6.6%
25 to 34 years	26,008	11.4%
35 to 44 years	34,153	14.9%
45 to 54 years	35,456	15.5%
55 to 59 years	12,781	5.6%
60 to 64 years	12,089	5.3%
65 to 74 years	22,791	10.0%
75 to 84 years	16,575	7.2%
85 years and over	6,294	2.7%
Source: 2009-2013 ACS		

There were 10,894 persons under the age of 5 in Hialeah according to 2009-2013 ACS estimates – 4.8 percent of the population. The largest age cohort in the city was 45 to 54 years with 15.5% of the total population (35,456 persons), which was followed closely by age cohort 35 to 44 years with 14.9% of the total population (34,153 persons).

## Elderly

Persons aged 65 and over comprise a higher percentage of Hialeah's population than that of the county as a whole. Approximately 19.9 percent of the city's population was over the age of 65 (45,660 persons)—compared to the county at 14.4 percent (2009-2013 ACS). Furthermore, 2.7 percent of the city's population was aged 85 years and over (6,294 persons)—compared to 2.0 percent the county as a whole.

As people age they evolve a unique set of needs in terms of social services, healthcare, and housing – and as communities across the nation grow proportionately older, the needs of the elderly become an increasingly important aspect of both public and private decision making. Integral amongst these evolving needs is that of housing – housing that is decent, safe, and affordable, as well as housing that is accessible and located in proximity to services and transportation. Housing serves as a linchpin amongst the needs of the elderly because the affordability, location, and accessibility of where one lives directly impacts the ability to access health and social services – both in terms of financial cost and physical practicality. As a 2014 study from Harvard's Joint Center for Housing Studies further explains:

**“Accessibility is essential to older adults’ health and safety as physical and cognitive limitations increase. Proximity of housing to stores, services, and transportation enables older adults to remain active and productive members of their communities, meet their own basic needs, and maintain social connections. And for those with chronic conditions and disabilities, the availability of housing with supports and services determines the quality and cost of long-term care—particularly the portion paid with public funds.**

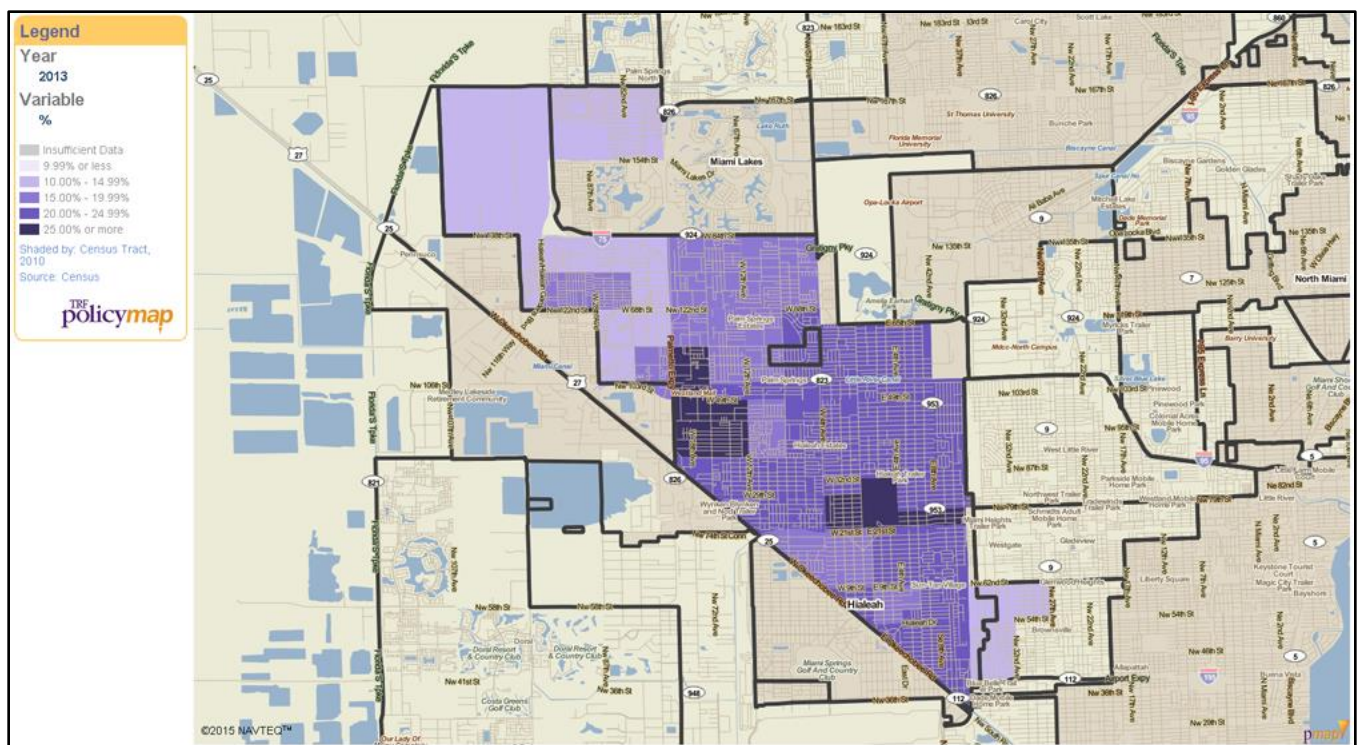
**But the existing housing stock is unprepared to meet the escalating need for affordability, accessibility, social connectivity, and supportive services.**

- **High housing costs force millions of low-income older adults to sacrifice spending on other necessities including food, undermining their health and well-being.**
- **Much of the nation’s housing inventory lacks basic accessibility features, preventing older adults with disabilities from living safely and comfortably in their homes.**
- **The nation’s transportation and pedestrian infrastructure is generally ill-suited to those who cannot or choose not to drive, isolating older adults from friends and family.**

- Disconnects between housing programs and the health care system put many older adults with disabilities or long-term care needs at risk of premature institutionalization.”<sup>1</sup>

The following two maps display highlight the geographic distribution of the elderly population throughout the city. The first map details the distribution of those aged 65 and older whereas the second map details the distribution of those aged 85 and older. Lighter colored shades represent areas with lower populations and darker shades represent areas with higher populations.

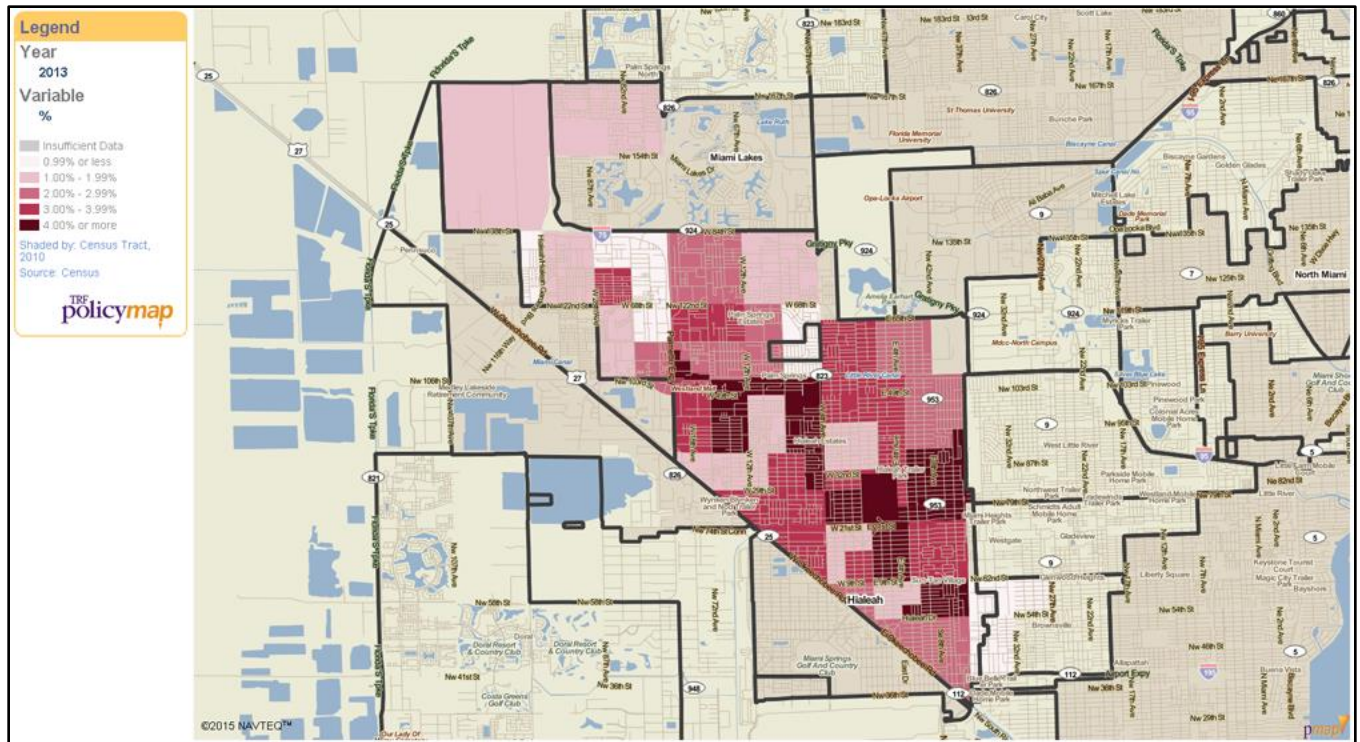
**MAP: Elderly - 65 and Older**



<sup>1</sup> Joint Center for Housing Studies of Harvard University, *Housing America's Older Adults*  
Retrieved from: [http://www.jchs.harvard.edu/research/housing\\_americas\\_older\\_adults](http://www.jchs.harvard.edu/research/housing_americas_older_adults)



## MAP: Elderly - 85 and Older



## Age Dependency Ratios

Age dependency ratios relate the number of working aged persons to the number of dependent aged persons (children and the elderly). These indicators provide insight into the social and economic impacts of shifts in the age structure of a population. Higher ratios of children and the elderly require higher levels of services to meet the specific needs of those populations. Furthermore, a higher degree of burden is placed on an economy when those who mainly consume goods and services become disproportionate to those who produce. It is important to note that these measures are not entirely precise – not everyone under the age of 18 and over 65 is economically dependent, and not all working age individuals are economically productive. With these caveats in mind, dependency ratios are still helpful indicators in gauging the directional impacts of shifting age structures.

An area's age dependency ratio is comprised of two smaller ratios – the child dependency ratio and the old-age dependency ratio. In 2013 Hialeah's overall dependency ratio was 61.4, higher than the county ratio of 55.9. The city's old-age dependency ratio was 33.2 and child dependency ratio was 29.2% while the county old-age ratio was 22.4 and child dependency ratio was 33.4%.

Rising age dependencies can be expected to continue in Hialeah as the nation as a whole continues down the same demographic path. A 2010 US Census report on aging trends in the United States provides insight into the extent of the coming shift in the United States: "By 2030, all of the baby boomers will have moved into the ranks of the older population. This will result in a shift in the age structure, from 13 percent of the population aged 65 and older in 2010 to 19 percent in 2030." As this shift occurs the working age population will simultaneously be shrinking. Sixty percent of the nation's population was aged 20-64 in 2010. The Census estimates that by "2030, as the baby boomers age, the proportion in these working ages will drop to 55 percent."<sup>2</sup>

Paying attention to changes in old-age dependency ratios is especially pertinent for communities with declining populations. A shrinking working age population means fewer workers producing goods and services, and consequently generating less tax revenue. All the while the aging population increases demand for social services, healthcare, and housing for the elderly. The intersection of these two trends presents a unique challenge for communities in the coming years.

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<sup>2</sup> US Census Bureau, *The Next Four Decades: The Older Population in the United States: 2010 to 2050*. Retrieved from: <https://www.census.gov/prod/2010pubs/p25-1138.pdf>

## Race and Ethnicity

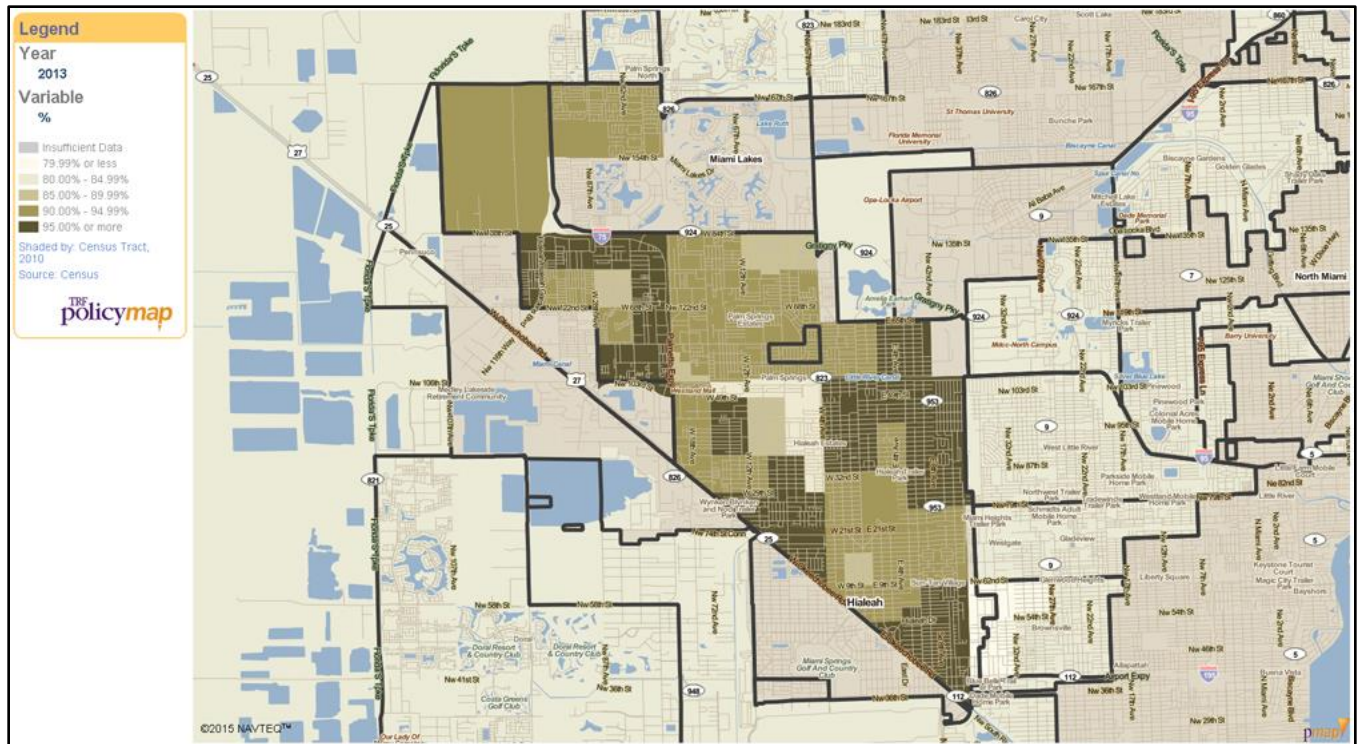
In 2013, over 95 percent of the residents in Hialeah were Hispanic or Latino of any race. Comparatively, the Hispanic population in Miami-Dade County as a whole was 64.9 percent. Persons can identify as both ethnically Hispanic and racially as another group. When accounting for race, at 93.7 percent of the population, Whites were the largest racial group in Hialeah, while Whites accounted for 75.2 percent of the population in the county as a whole. Blacks or African Americans in Hialeah are 2.1 percent of the population, however Blacks or African Americans made up 18.8 percent of the total county population. All other races in the city made up less than 4 percent. The table below provides a detailed breakdown of the racial and ethnic composition of Hialeah compared to that of the county as a whole.

<b>TABLE: Racial and Ethnic Composition</b>				
<b>Race</b>	<b>Hialeah</b>	<b>%</b>	<b>Miami-Dade</b>	<b>%</b>
White	214,614	93.7%	1,916,250	75.2%
Black or African American	4,835	2.1%	480,201	18.8%
American Indian and Alaska Native	136	0.1%	4,092	0.2%
Asian	1,115	0.5%	40,515	1.6%
Native Hawaiian and Other Pacific Islander	0	0.0%	644	0.0%
Some other race	6,450	2.8%	71,327	2.8%
Two or more races	1,793	0.8%	36,046	1.4%
Hispanic or Latino (of any race)	217,621	95.1%	1,653,390	64.9%
Source: 2009-2013 ACS				

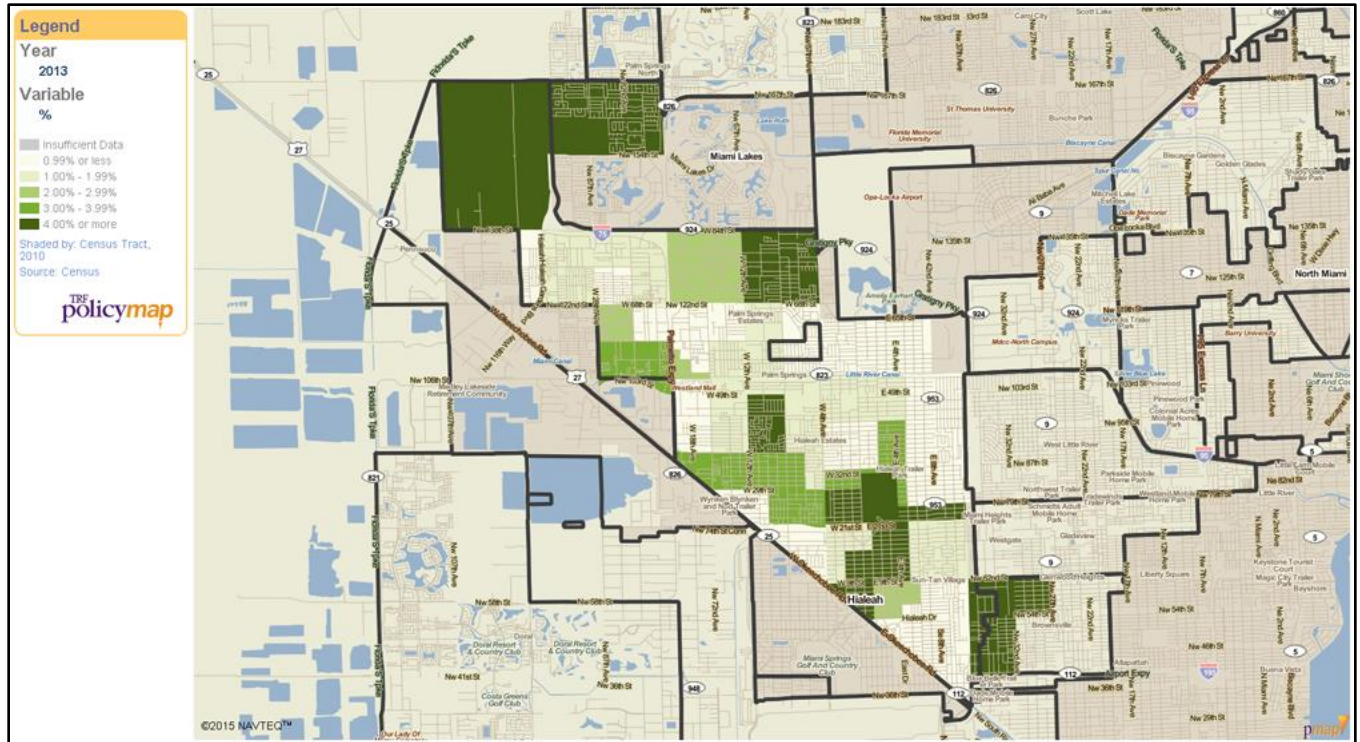
The following series of maps displays the geographic distribution of various racial and ethnic groups throughout Hialeah. Lighter colored shades represent areas with lower populations and darker shades represent areas with higher populations.



MAP: White

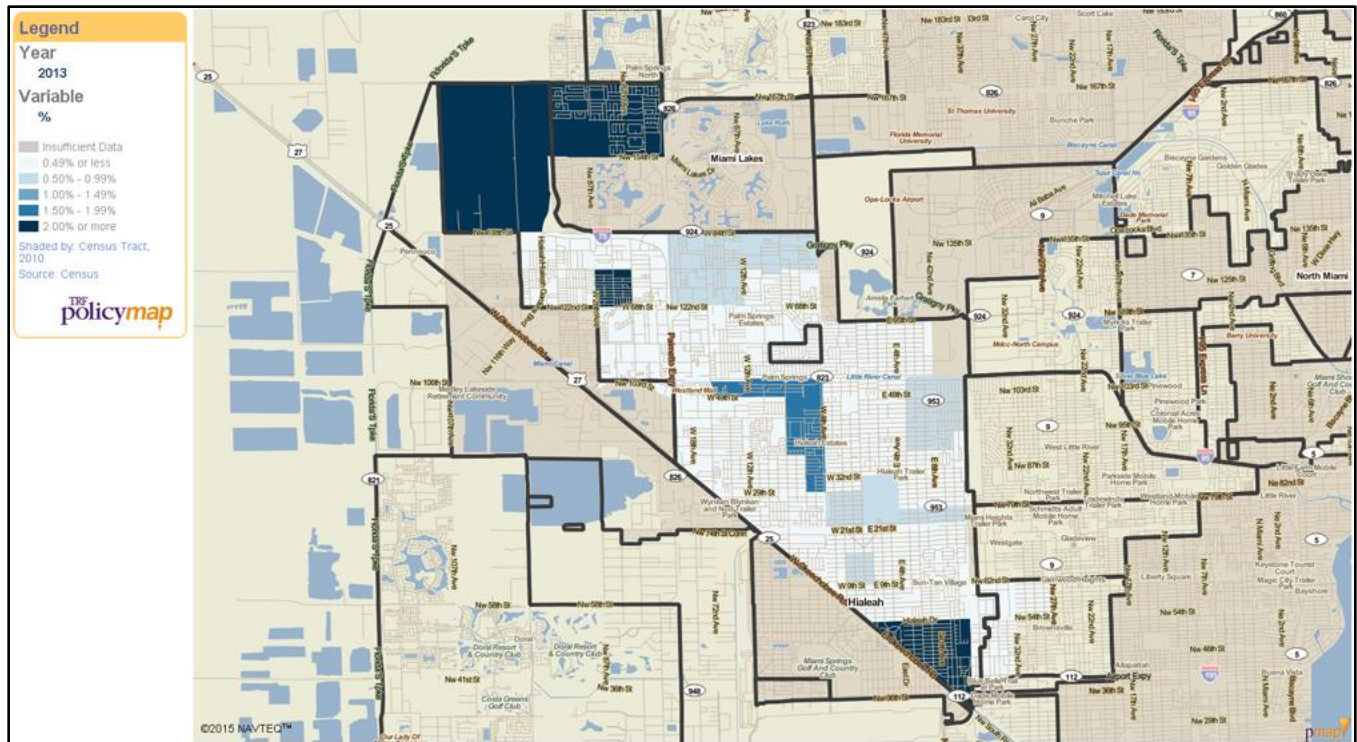


MAP: Black/African American

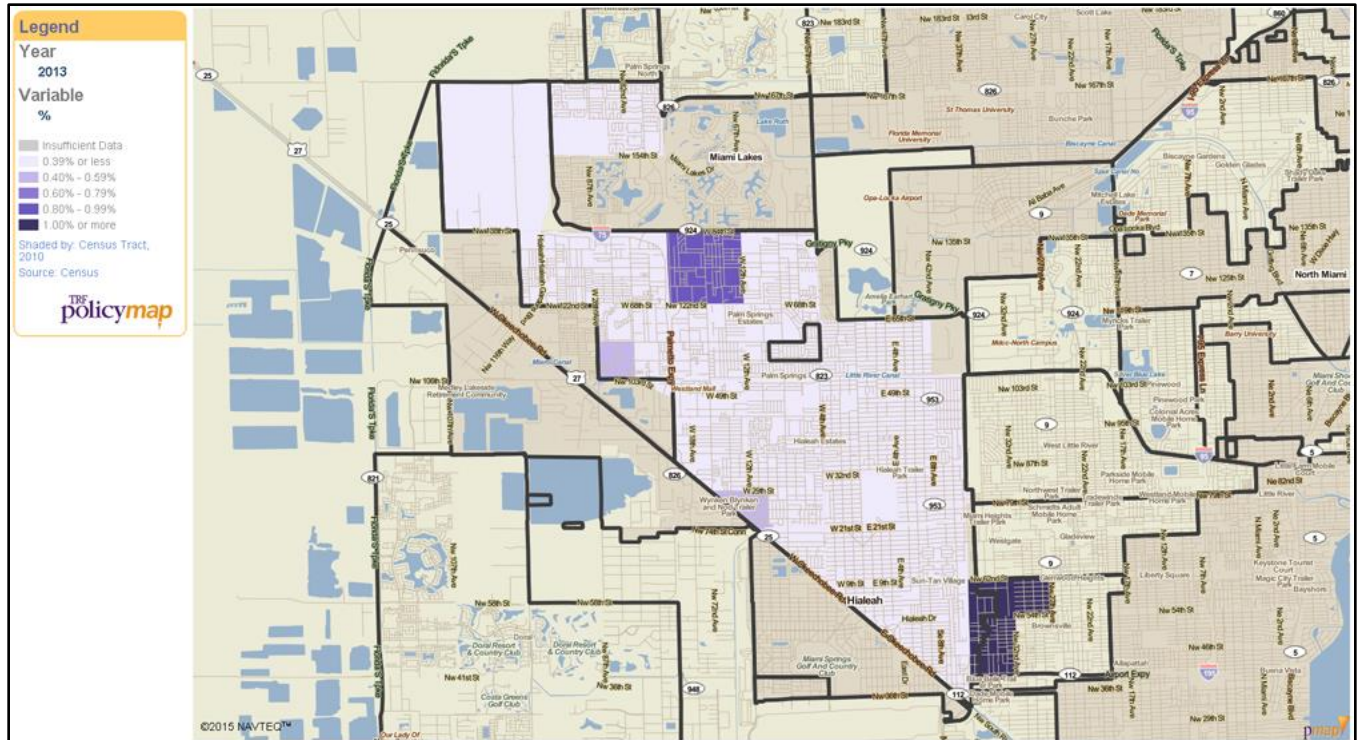




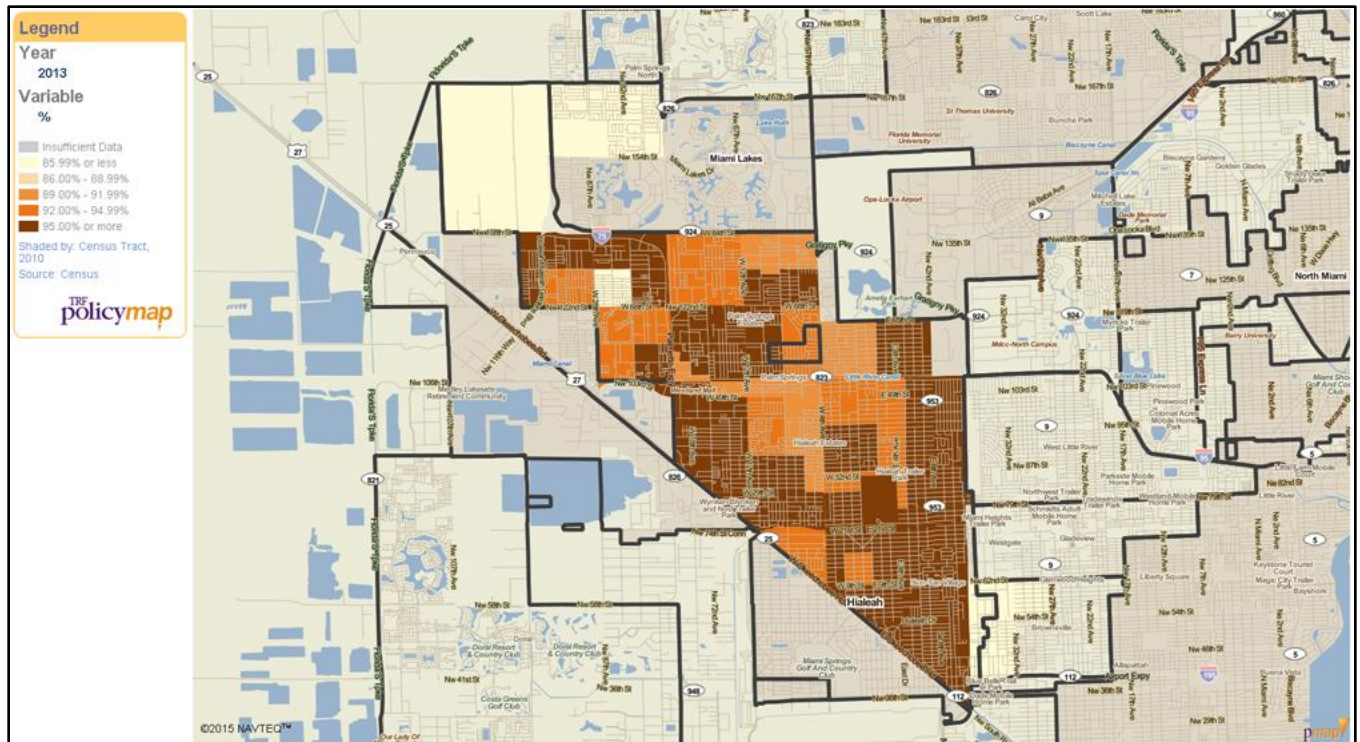
## MAP: Asian



## MAP: American Indian or Alaskan Native



## MAP: Hispanic



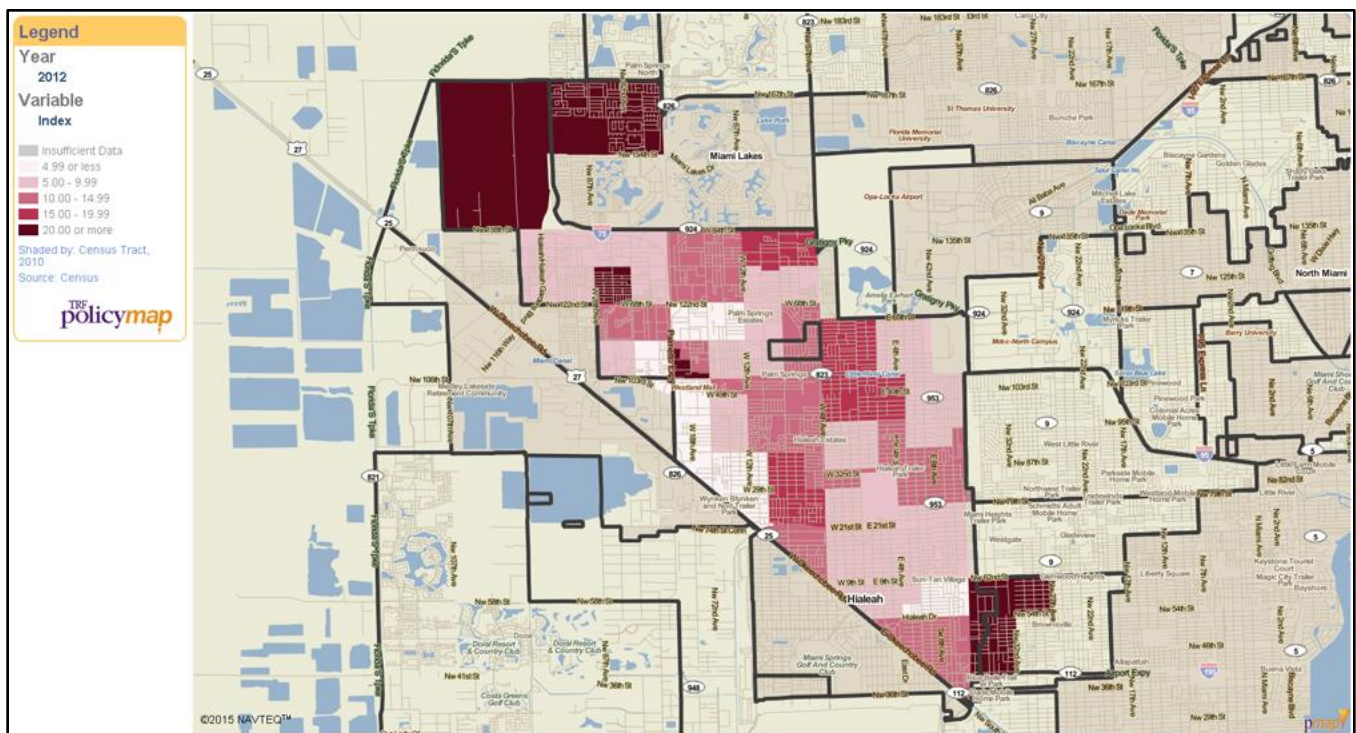


## Diversity

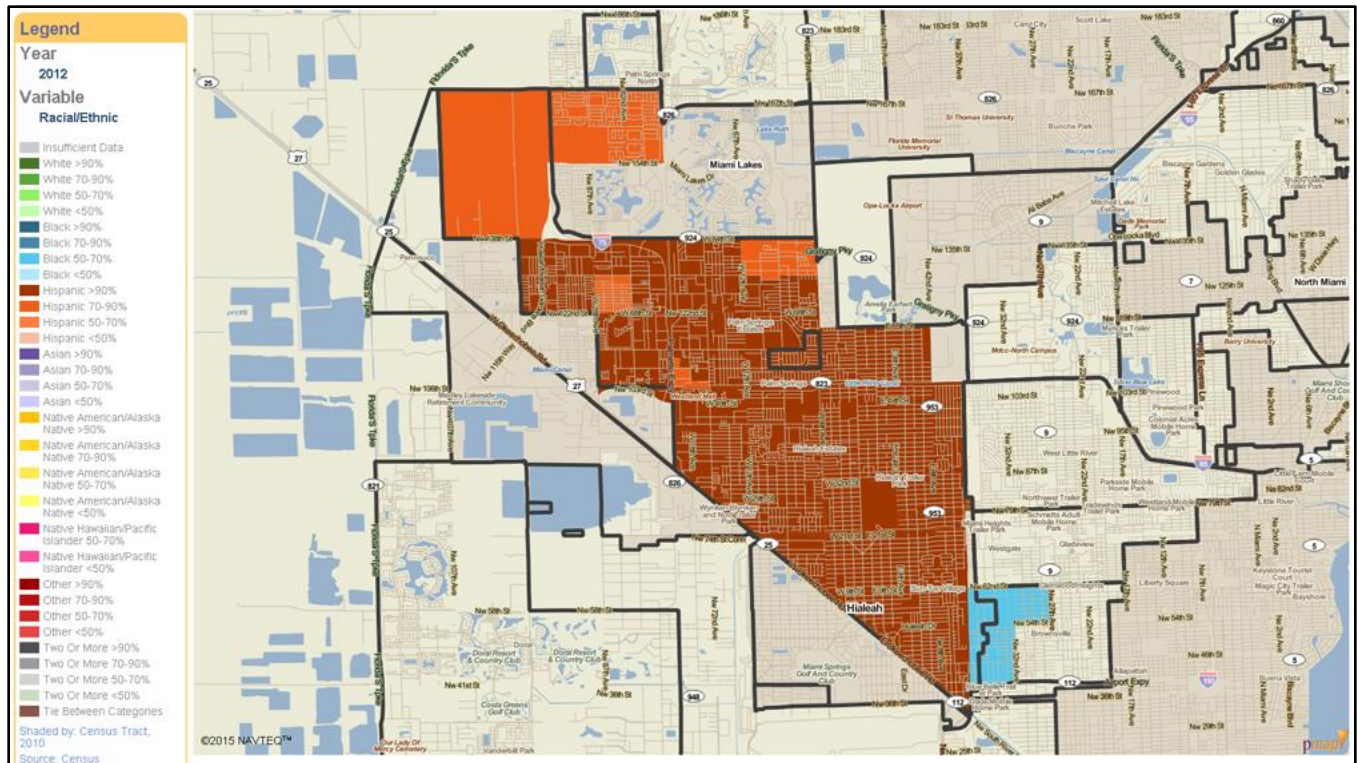
The following map displays the Diversity Index ranking for Hialeah, based on data from Policy Map. As Policy Map explains: “The diversity index is an index ranging from 0 to 87.5 that represents the probability that two individuals, chosen at random in the given geography, would be of different races or ethnicities between 2008-2012. Lower index values between 0 and 20 suggest more homogeneity and higher index values above 50 suggest more heterogeneity. Racial and ethnic diversity can be indicative of economic and behavioral patterns. For example, racially and ethnically homogenous areas are sometimes representative of concentrated poverty or concentrated wealth. They could also be indicative of discriminatory housing policies or other related barriers.”

Lighter shaded areas carry lower Diversity Index scores (meaning less diverse), and darker shaded areas carry higher scores (meaning more diverse).

### MAP: Diversity Index



## MAP: Diversity – Predominant Race



## Disability

According to 2009-2013 ACS 5-Year estimates, 28,707 Hialeah residents had a disability of some sort – 12.6 percent of the total population. In addition to barriers such as housing discrimination and the difficulty of finding accessible units, persons with disabilities face financial hardships at rates much higher than the average person. In Hialeah, 10.9 percent of working age individuals with a disability were employed according to 2013 ACS estimates. Furthermore, when disabled persons are employed they earn significantly less than the non-disabled. In 2013 the median earnings for disabled persons in Hialeah was \$17,092 – compared to \$20,521 for those with no disability. Unsurprisingly, the 31.2 percent poverty rate amongst the county’s disabled was almost thirty percent more than the rate amongst the non-disabled of 21.9 percent (2009-2013 ACS). In light of these depressed economic conditions, decent and affordable housing remains firmly out of the reach for a large portion of the disabled population.

The table below provides data on the extent of disabilities amongst differing age cohorts for the city. Approximately 39.2 percent of elderly persons in the city had a disability – a total of 17,602 elderly with a disability.

<b>TABLE: Disability and Age</b>		
<b>Disability Status or Age Group</b>	<b>Population in Hialeah</b>	<b>%</b>
Persons with a disability	28,707	12.6%
Population under 5 years	6	0.0%
Population 5 to 17 years	853	2.8%
Population 18 to 64 years	10,246	7.2%
Population 65 years and over	17,602	39.2%
Source: 2009-2013 ACS		

The following table provides data on the extent of disabilities amongst different racial and ethnic groups in Hialeah. In the city, American Indians and Alaskan Native experience 32.4 percent with a disability, almost three times of the citywide rate. Approximately 12.6 percent of Whites are with a disability and Blacks or African American experience 16 percent with disabilities. Other minority groups experience less with disability, however the group Two or more races experienced 17.6 percent with a disability. It is important to note persons can identify as both ethnically Hispanic and racially as another group. In Hialeah, the population is 95.1 percent Hispanic or Latino. (Source: 2009-2013 ACS 5-Yr Estimates)

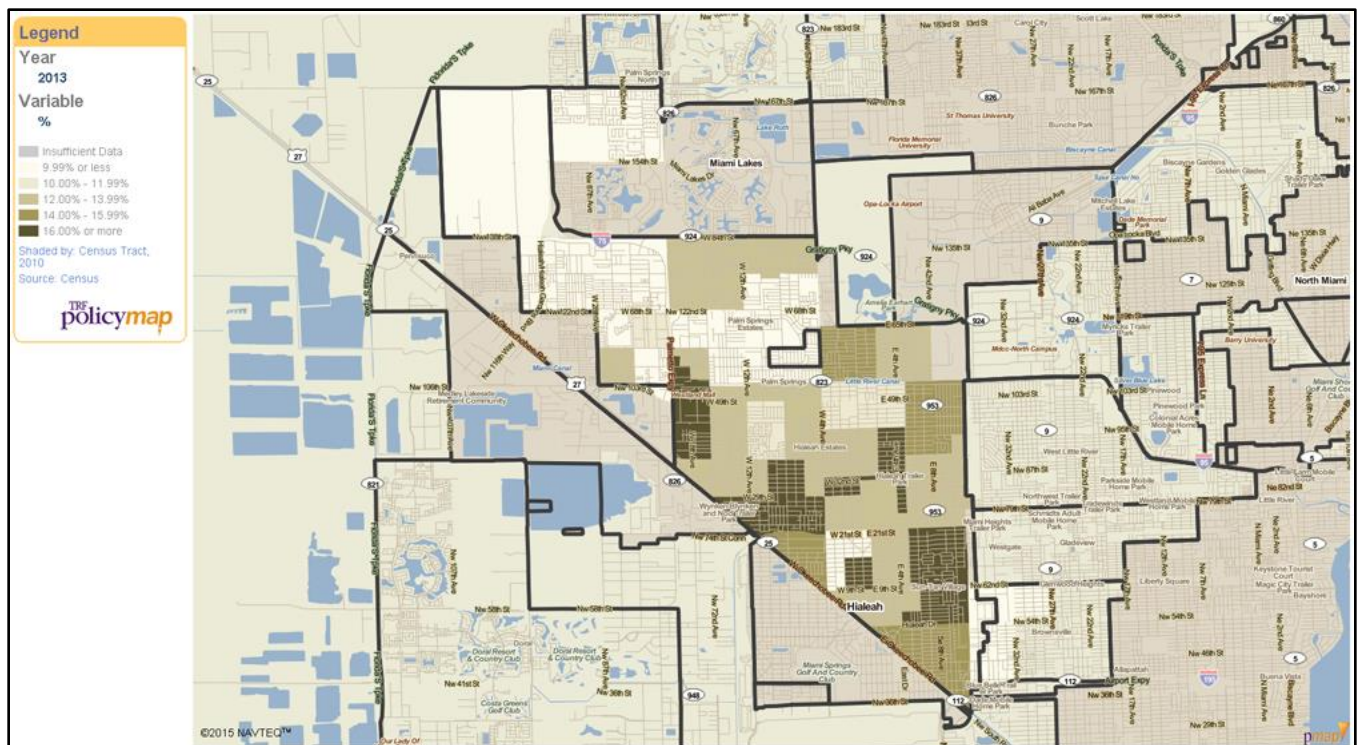


**TABLE: Disability and Race**

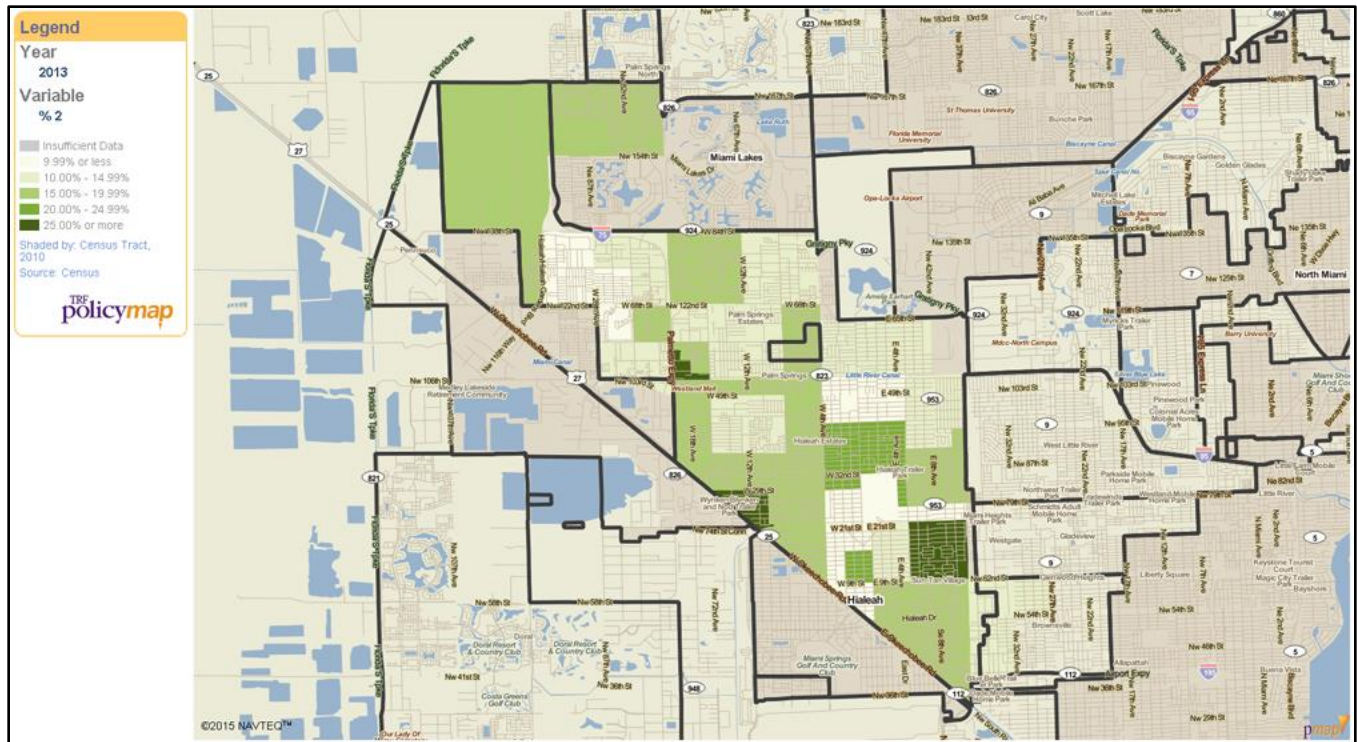
Race	People with Disabilities in Hialeah	%
White	26,926	12.6%
Black or African American	756	16.0%
American Indian and Alaska Native	44	32.4%
Asian	62	5.6%
Native Hawaiian and Other Pacific Islander	0	0.0%
Some other race	606	9.5%
Two or more races	313	17.6%
Hispanic or Latino (of any race)	27,052	12.5%
Source: 2009-2013 ACS		

The following series of maps highlights the geographical distribution of the disabled population across differing variables. Lighter colored shades represent areas with lower populations and darker shades represent areas with higher populations.

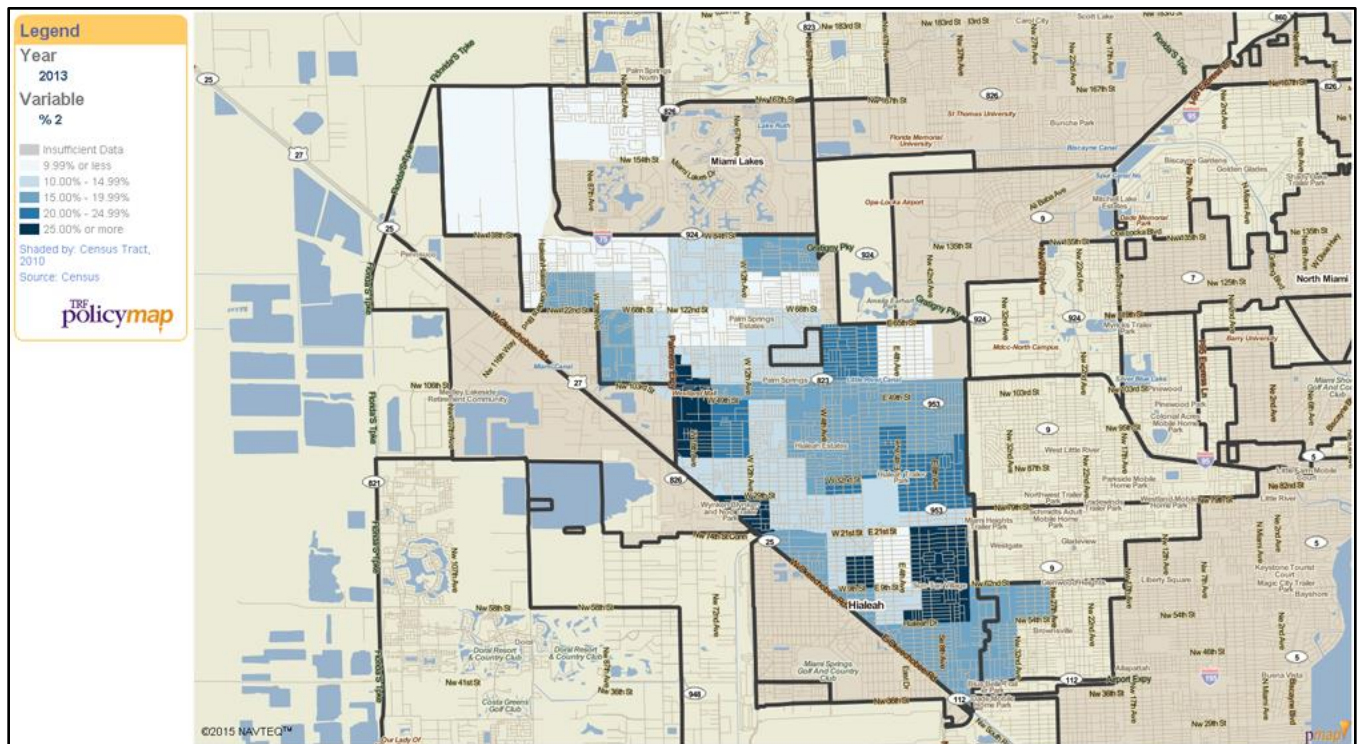
**MAP: Persons with Disability**



## MAP: Unemployed with a Disability

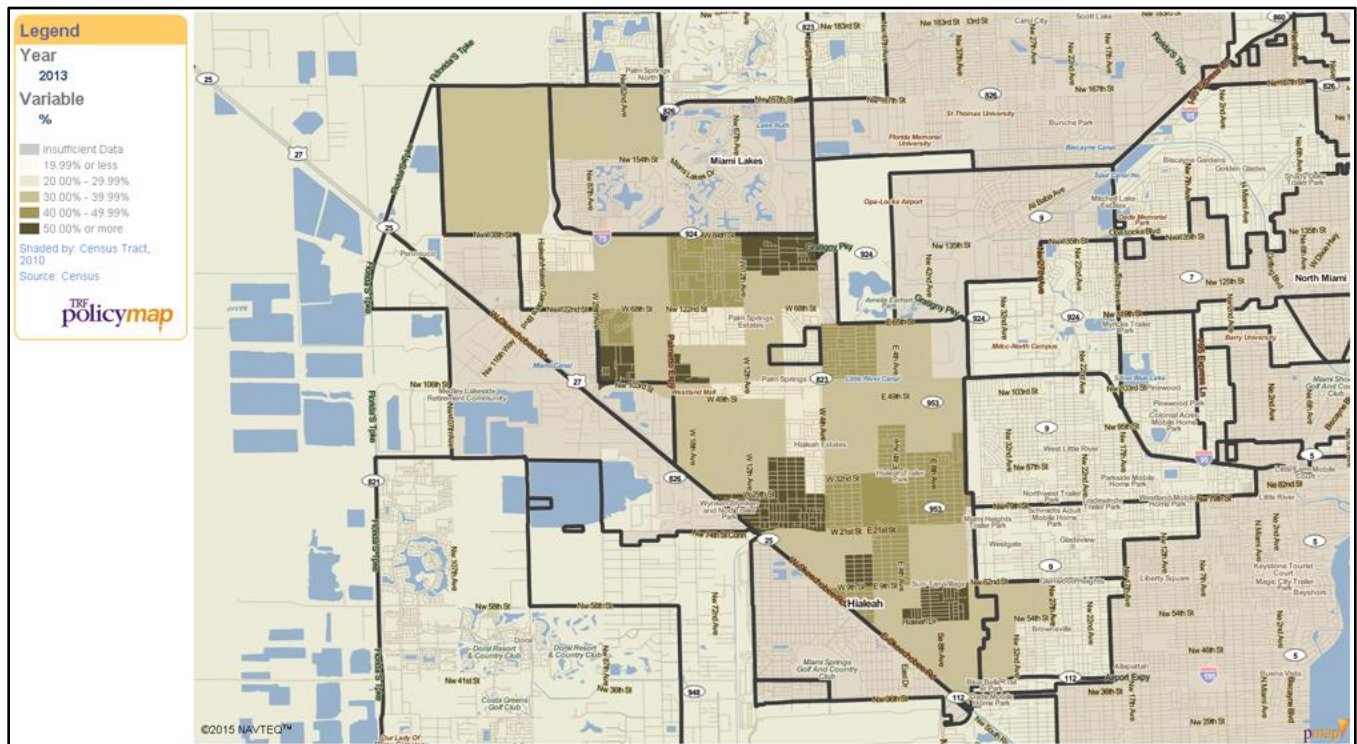


## MAP: Living in Poverty with Disability





## MAP: Elderly with Disability





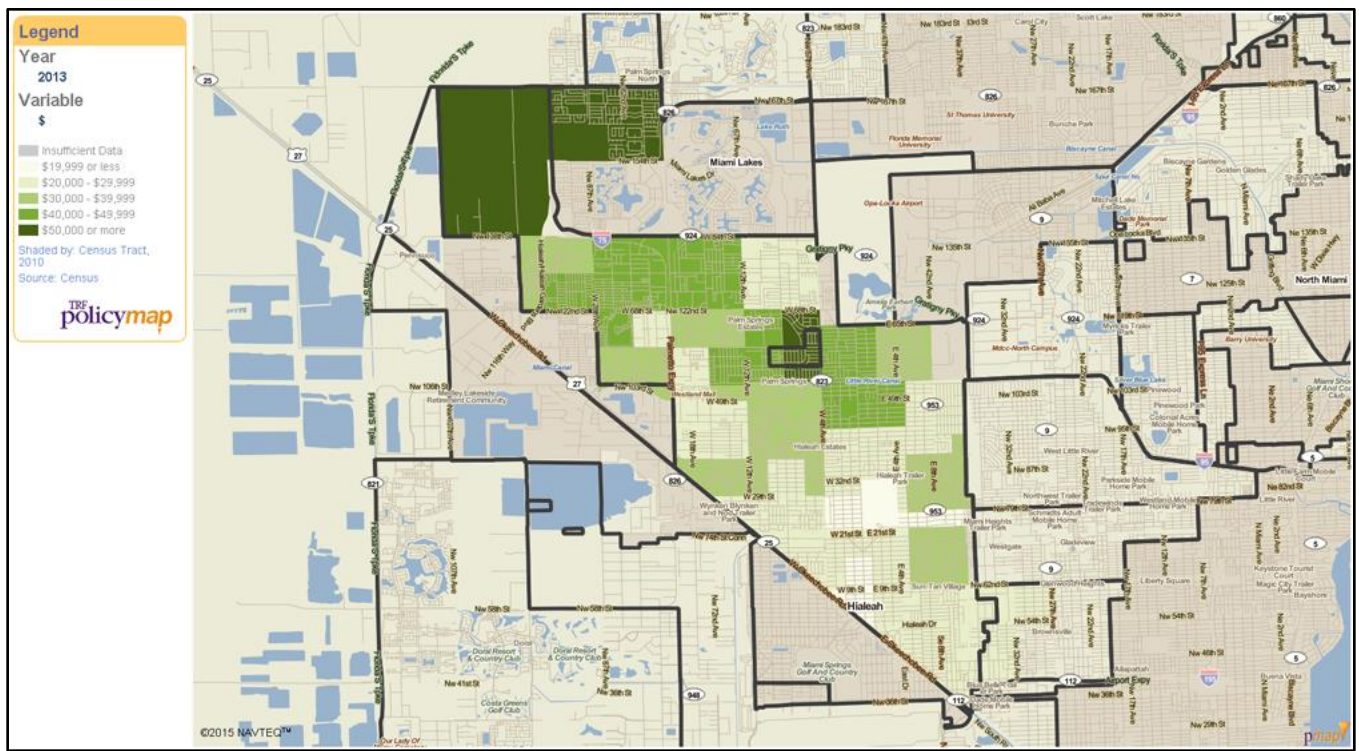
## Income

According to 2009-2013 American Community Survey figures, the median household income (MHI) in Hialeah was \$29,961, and only a 1.6 percent increase from 2000. This was much less than the county MHI increase of 19.8 percent over the same period. Hialeah households also earned less than households countywide at approximately 69.5 percent of county households.

TABLE: Median Household Income			
	2000	2013	% Change 2000-2013
Hialeah	\$ 29,492	\$ 29,961	1.6%
Miami-Dade County	\$ 35,966	\$ 43,100	19.8%
Source: 2009-2013 ACS			

The map below displays the geographical distribution of median household income throughout Hialeah. The lighter shades represent areas where the MHI was less, and increases as the shades turn darker.

**MAP: Median Household Income**



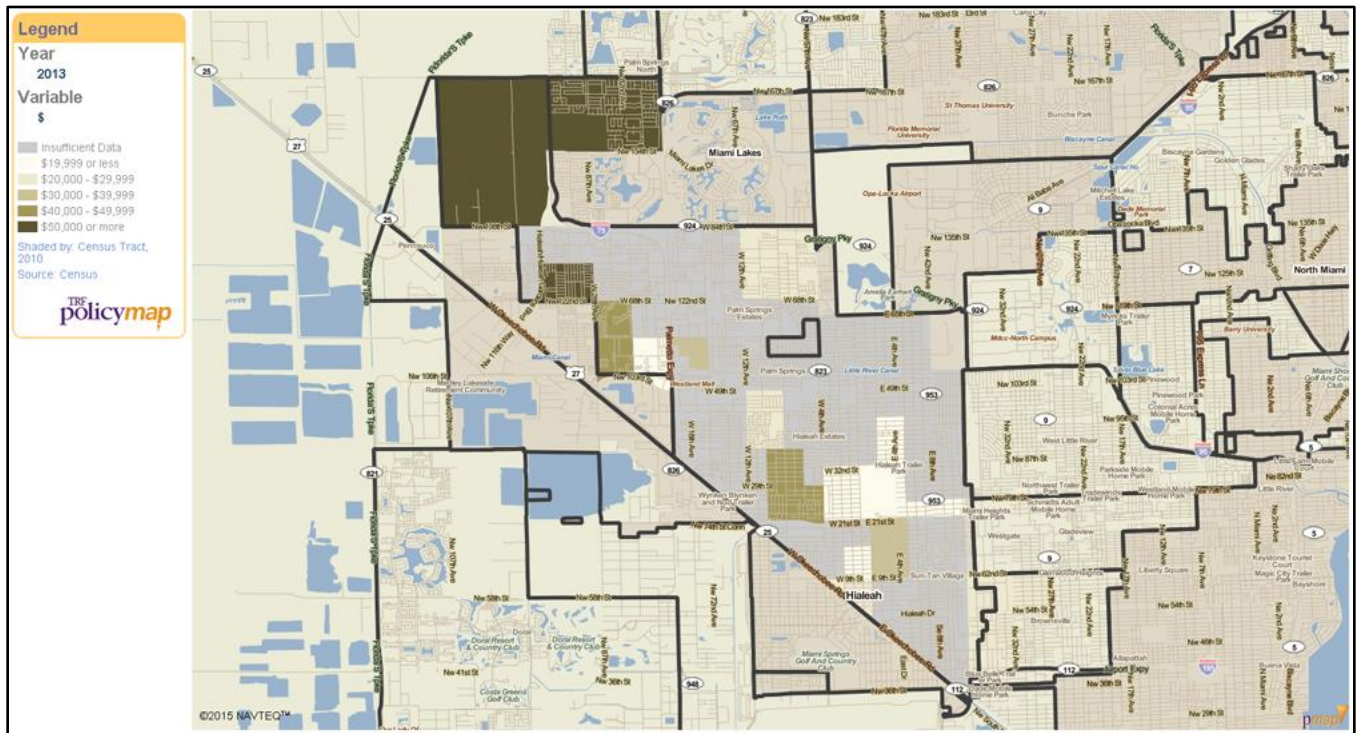
## Income and Race

While the 2013 citywide median household income (MHI) was \$29,961, there was a significant disparity amongst differing racial and ethnic groups. Hispanics or Latinos were the largest ethnic group and race by far and had an MHI at \$29,804 contributing significantly to the citywide MHI. It is important to note persons can identify as both ethnically Hispanic and racially as another group. In a break down, Whites (alone) had a MHI of \$34,545, higher than the citywide MHI. Asian households earned much higher than the city MHI at \$50,847. Black and African American households earned only \$21,852 - just 72.9 percent that of the city median. The MHI for American Indians or Alaskan Natives and Native Hawaiians and Other Pacific Islanders in the city were not available (N/A). The following chart visually compares the 2013 median income earned by households of differing racial and ethnic groups.

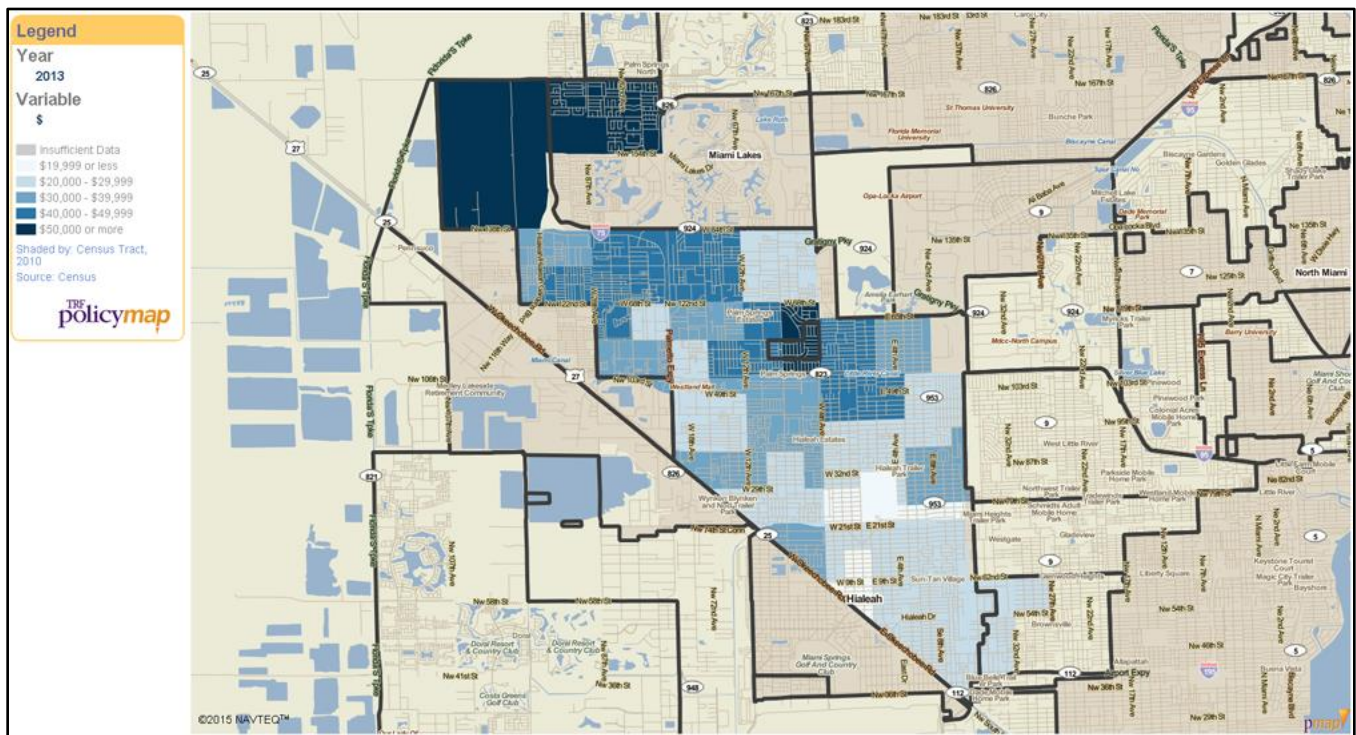
<b>TABLE: Median Household Income by Race (in the past 12 months)</b>	
<b>Race</b>	<b>Median Income</b>
White	\$29,956
Black or African American	\$21,852
American Indian or Alaskan Native	N/A
Asian	\$50,847
Native Hawaiian and Other Pacific	N/A
Some other race	\$36,111
Two or more races	\$31,042
Hispanic or Latino	\$29,804
White (alone)	\$34,545
Source: 2009-2013 ACS	

The following two maps display the distribution of Black and Hispanic households based on median household income. Lighter shaded areas represent areas where the particular groups have lower MHIs and darker shaded areas represent areas where the groups have higher MHIs.

## MAP: Median Household Income – Black or African American



## MAP: Median Household Income – Hispanic





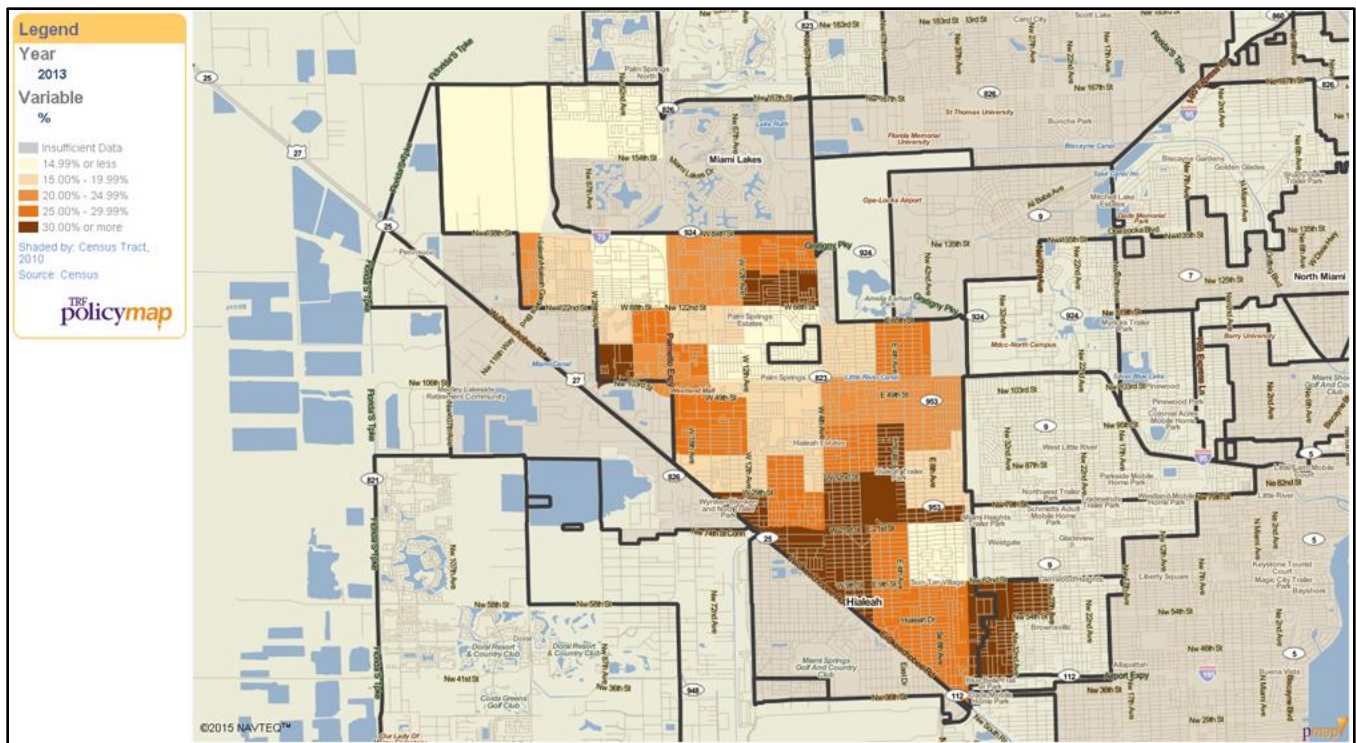
## Poverty

From 2000 to 2013 the poverty rate in Hialeah increased 31.7 percent; during the same time period the county poverty rate grew just 10.6 percent. Furthermore, the poverty rate for all individuals in Hialeah was 24.5 percent. This was almost one-fifth higher than the county rate of 19.9 percent. (Source: 2009-2013 American Community Survey 5-Year Estimates)

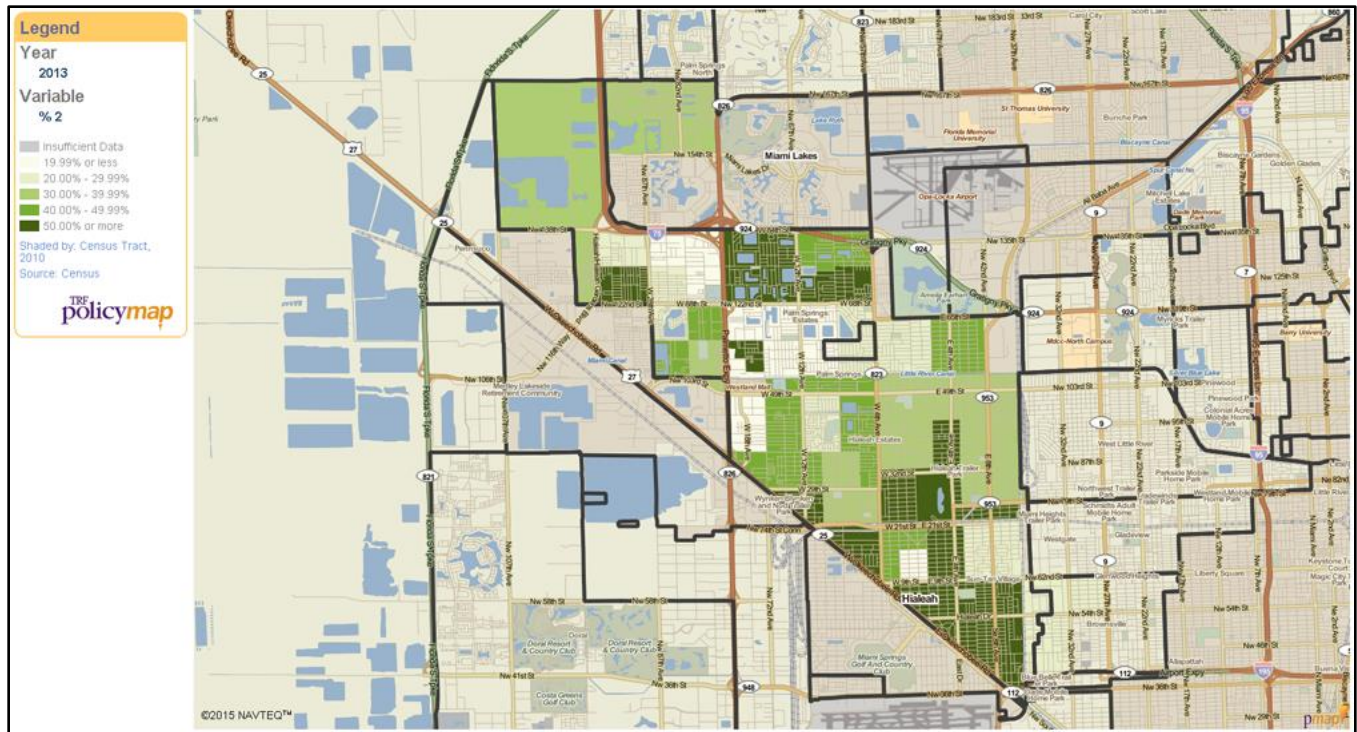
TABLE: Poverty			
	% in poverty 2000	% in poverty 2013	% change 2000-2013
Hialeah	18.6%	24.5%	31.7%
Miami-Dade County	18.0%	19.9%	10.6%
Source: Census 2000, 2009-2013 ACS			

The following series of maps below display the geographical distribution of poverty throughout the city. The lighter shades represent areas where the poverty rate was less. Poverty rate increases as the shades turn darker.

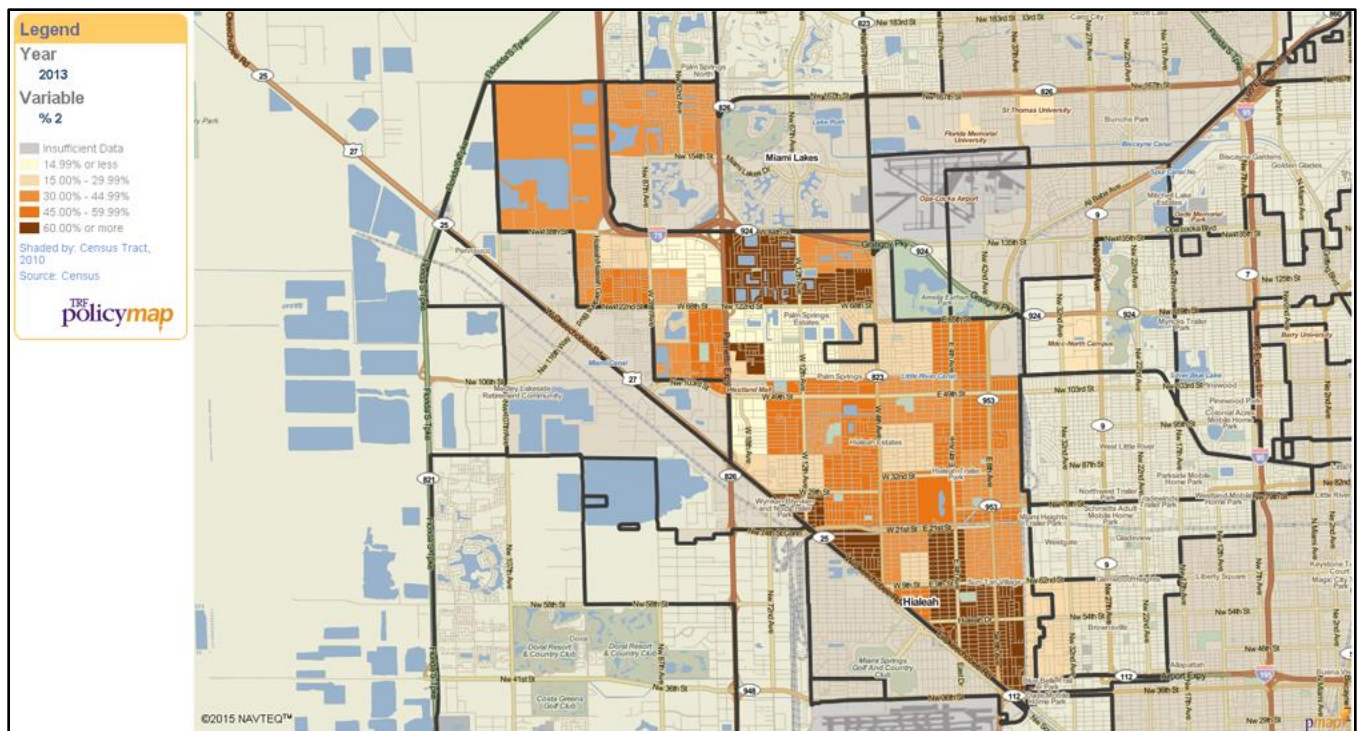
### MAP: People in Poverty



## MAP: Single Headed Families with Children in Poverty



## MAP: Single Female Headed Families with Children in Poverty





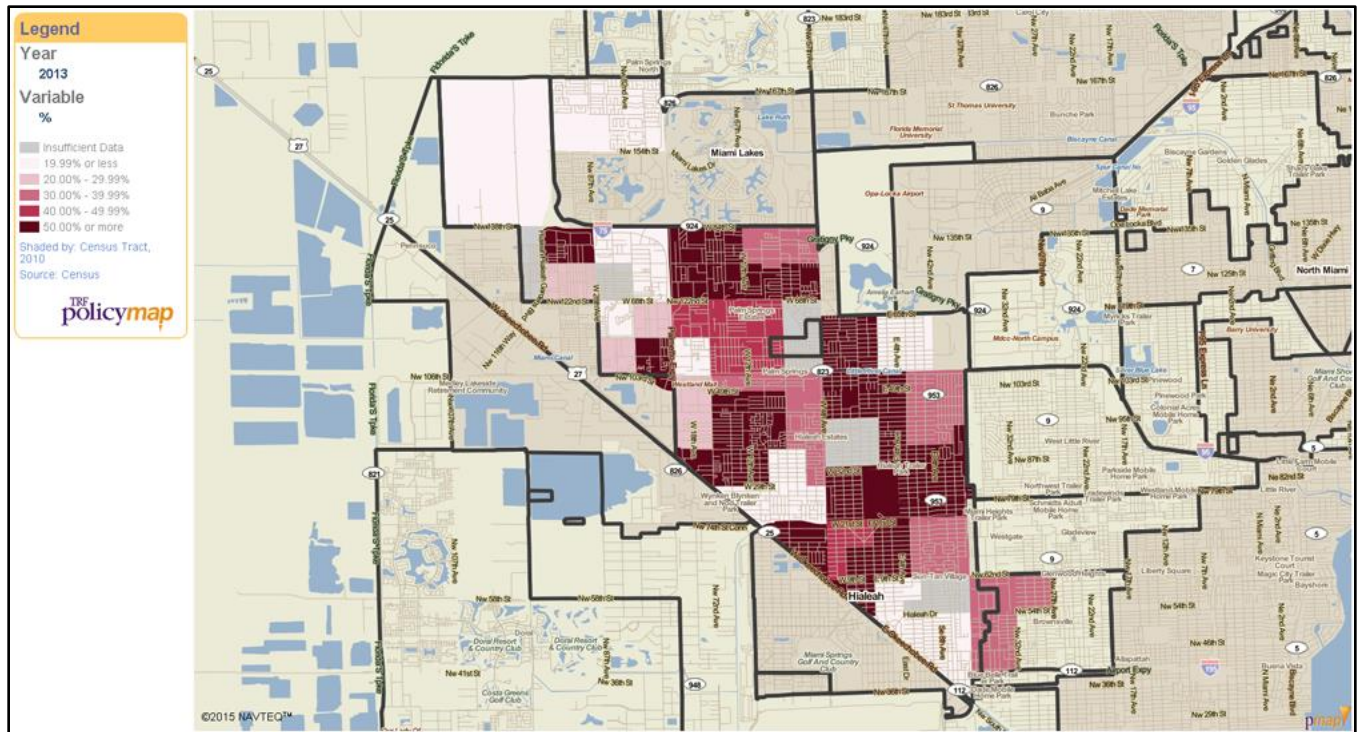
## Poverty and Race

While the 2013 citywide poverty rate (all people) was 24.5 percent, there was a significant disparity amongst differing racial and ethnic groups. Whites, the largest race by far in the city had a poverty rate of 24 percent. It is important to note, persons can identify as both ethnically Hispanic and racially as another group. The Hispanic or Latino population in Hialeah is 95.1 percent. Accounting for this, Hispanic or Latino persons had a poverty rate of 24.6 percent, contributing significantly to the citywide rate. White (alone) persons had a lower poverty rate than the citywide rate at 20.1 percent. Approximately 48.5 percent of Black and African American persons were below the poverty level – well above and almost twice the citywide rate. American Indian and Alaskan Native persons had the lowest poverty rate at 9.6 percent. Asians had a poverty rate lower than the city rate at 22.8 percent. Native Hawaiian and Other Pacific Islander persons were not counted. The following chart visually compares the 2013 individuals below the poverty level of differing racial and ethnic groups.

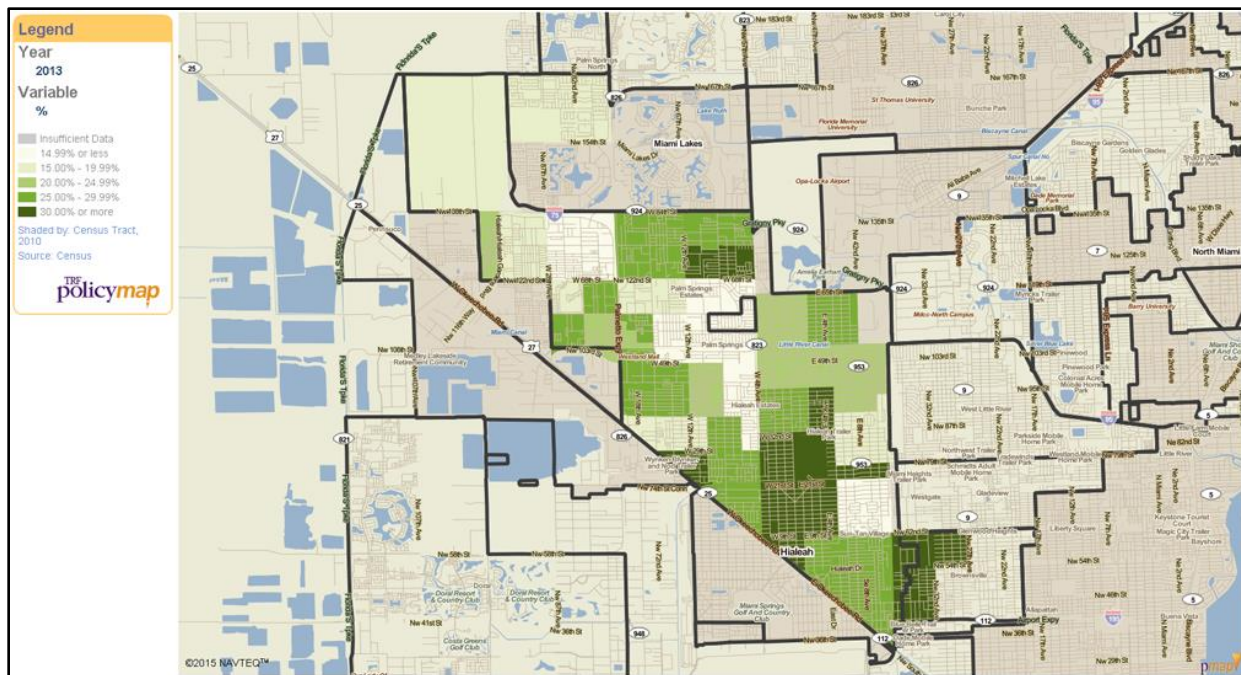
<b>TABLE: Poverty and Race</b>		
<b>Race</b>	<b>People in Poverty in Hialeah</b>	<b>%</b>
White	51,290	24.0%
Black or African American	2,282	48.5%
American Indian and Alaska Native	13	9.6%
Asian	254	22.8%
Native Hawaiian and Other Pacific Islander	0	0.0%
Some other race	1,376	21.5%
Two or more races	466	26.3%
Hispanic or Latino (of any race)	53,231	24.6%
White (alone)	1,738	20.1%
Source: 2009-2013 ACS		

The following two maps display the distribution of the Black and Hispanic population based on poverty rate. Lighter shaded areas represent areas where the particular groups have lower rates of poverty and darker shaded areas represent areas where the groups have higher poverty rates.

## MAP: Poverty Rate – Black or African American



## MAP: Poverty Rate – Hispanic



## Employment

According to the 2009-2013 ACS, Educational services, and health care and social assistance was the largest employed industry in the city with 16,136 workers, approximately 16.6 percent. The second largest employed industry was Retail trade with 14,202 workers, approximately 14.6 percent.

<b>TABLE: Employment by Industry</b>		
<b>Industry</b>	<b>Estimate</b>	<b>%</b>
Agriculture, forestry, fishing and hunting, and mining	454	0.5%
Construction	8,836	9.1%
Manufacturing	11,151	11.4%
Wholesale trade	4,150	4.3%
Retail trade	14,202	14.6%
Transportation and warehousing, and utilities	8,626	8.8%
Information	1,733	1.8%
Finance and insurance, and real estate and rental and leasing	5,042	5.2%
Professional, scientific, and management, and administrative and waste	9,716	10.0%
Educational services, and health care and social assistance	16,136	16.6%
Arts, entertainment, and recreation, and accommodation and food services	8,892	9.1%
Other services, except public administration	6,549	6.7%
Public administration	1,985	2.0%
Source: 2009 – 2013 ACS.		

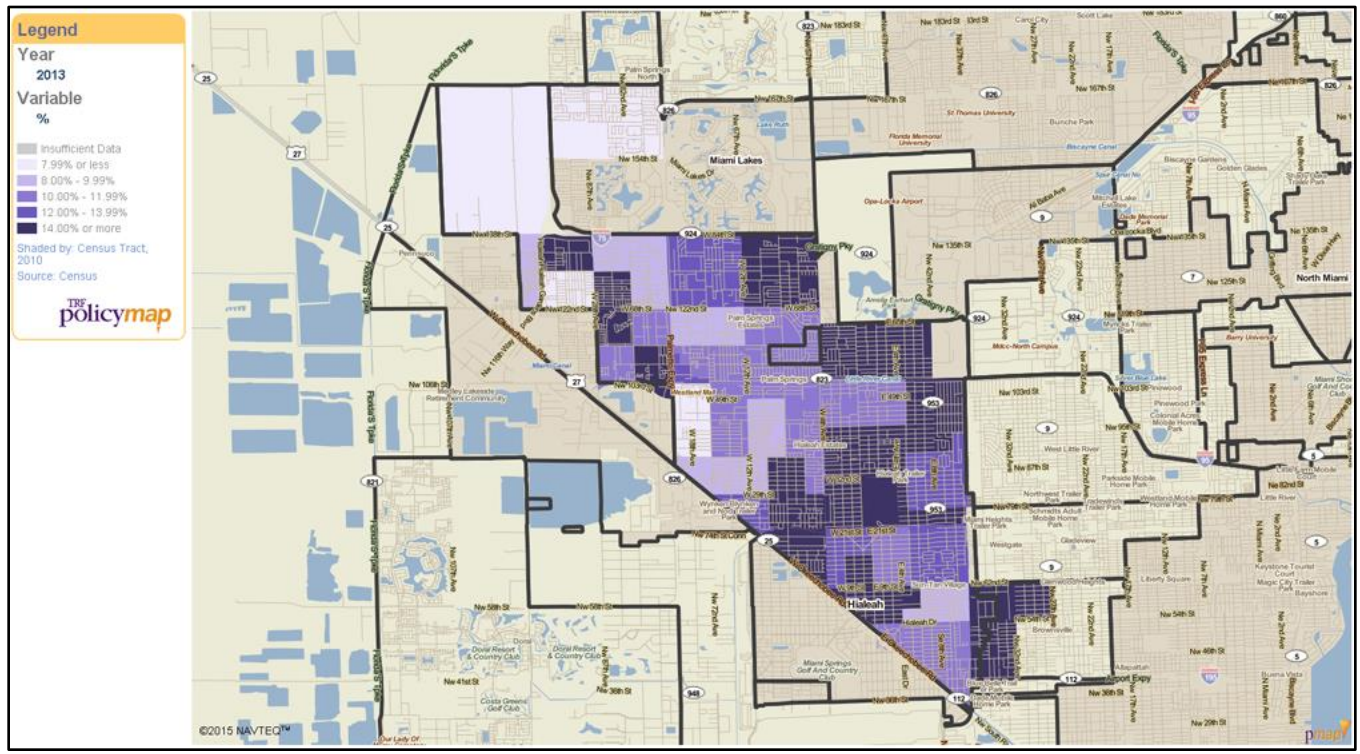
According to the 2009-2013 ACS, Hialeah saw an unemployment rate of 13.5%, an increase of 33.6% from 2000. (Source: Census 2000)

<b>TABLE: Unemployment Status</b>			
	<b>2000</b>	<b>2013</b>	<b>% change 2000-2013</b>
Unemployment Rate	10.1%	13.5%	33.6%
Source: 2009-2013 ACS			



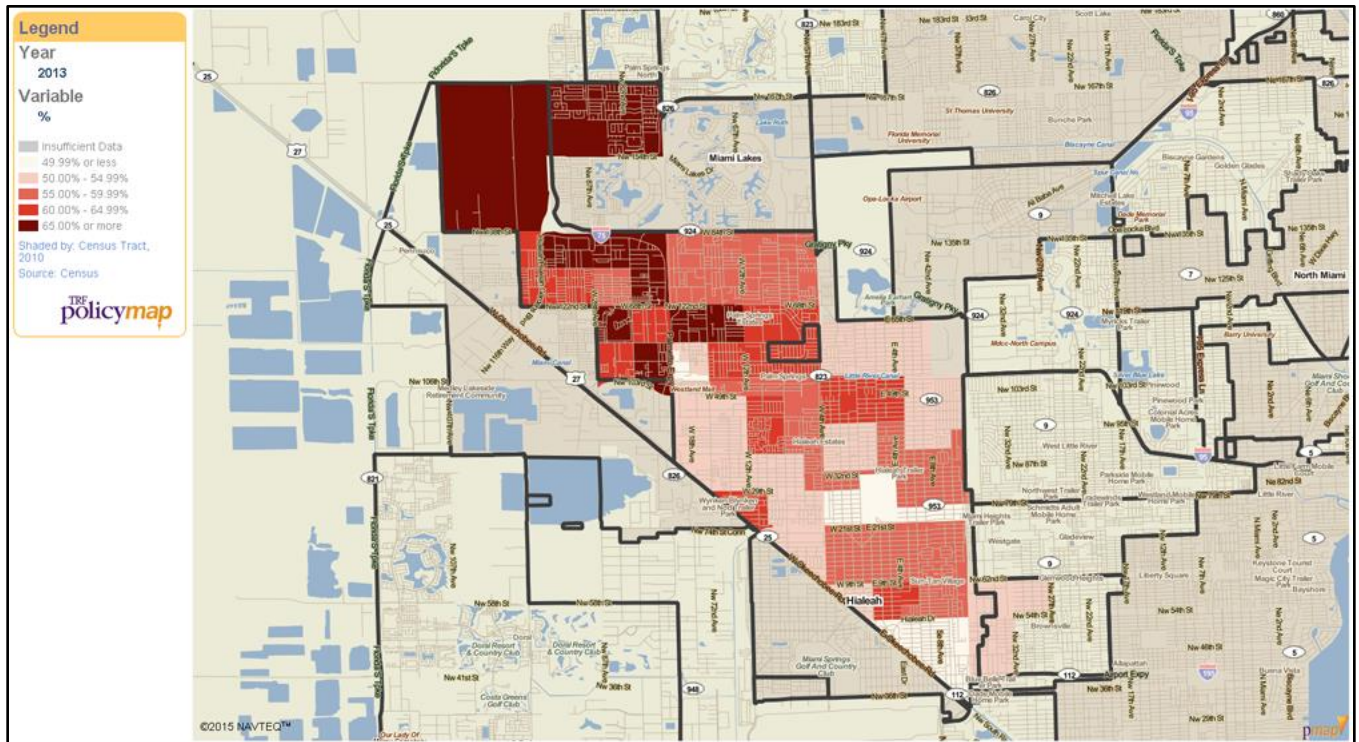
The following map displays the distribution of the unemployment population in Hialeah. Lighter shaded areas represent areas where the population has lower unemployment rates and darker shaded areas represent areas where the population has higher unemployment rates.

### MAP: Unemployment



The following map displays the distribution of the labor force in Hialeah. Lighter shaded areas represent areas where the population has a lower labor force percentage and darker shaded areas represent areas where the population has a higher labor force percentage.

**MAP: Labor Force**



## Transportation

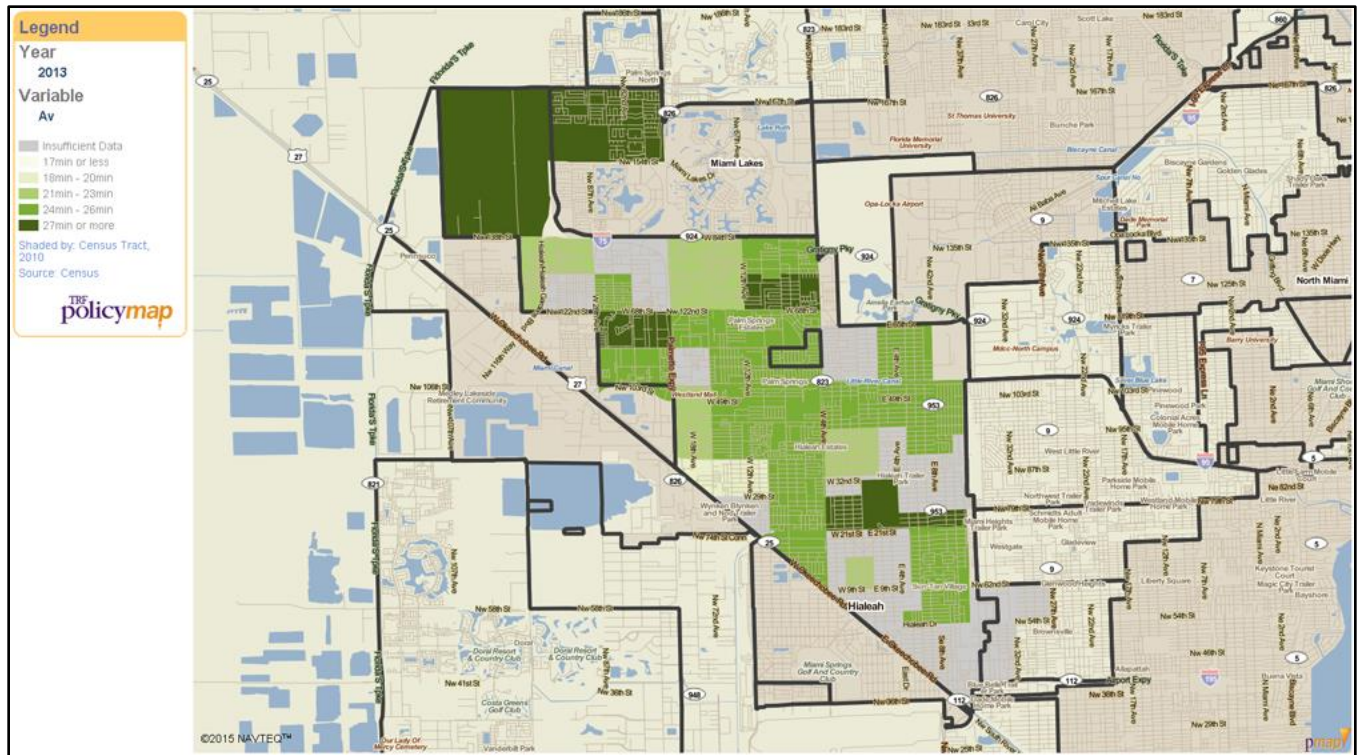
According to the 2009-2013 ACS, for workers 16 years and over (96,191 persons), the mean travel time to work in Hialeah is 24 minutes and for 86.9 percent the means of transportation was a car, truck or van. Public transportation only consisted of 2.4 percent of travel to work.

<b>TABLE: Commute Time</b>	
<b>Commute Time</b>	<b>% of Commuters</b>
Less than 10 minutes	6.0%
10 to 14 minutes	14.0%
15 to 19 minutes	15.8%
20 to 24 minutes	23.4%
25 to 29 minutes	5.6%
30 to 34 minutes	17.8%
35 to 44 minutes	6.9%
45 to 59 minutes	6.3%
60 or more minutes	4.1%
Source: 2009-2013 ACS	

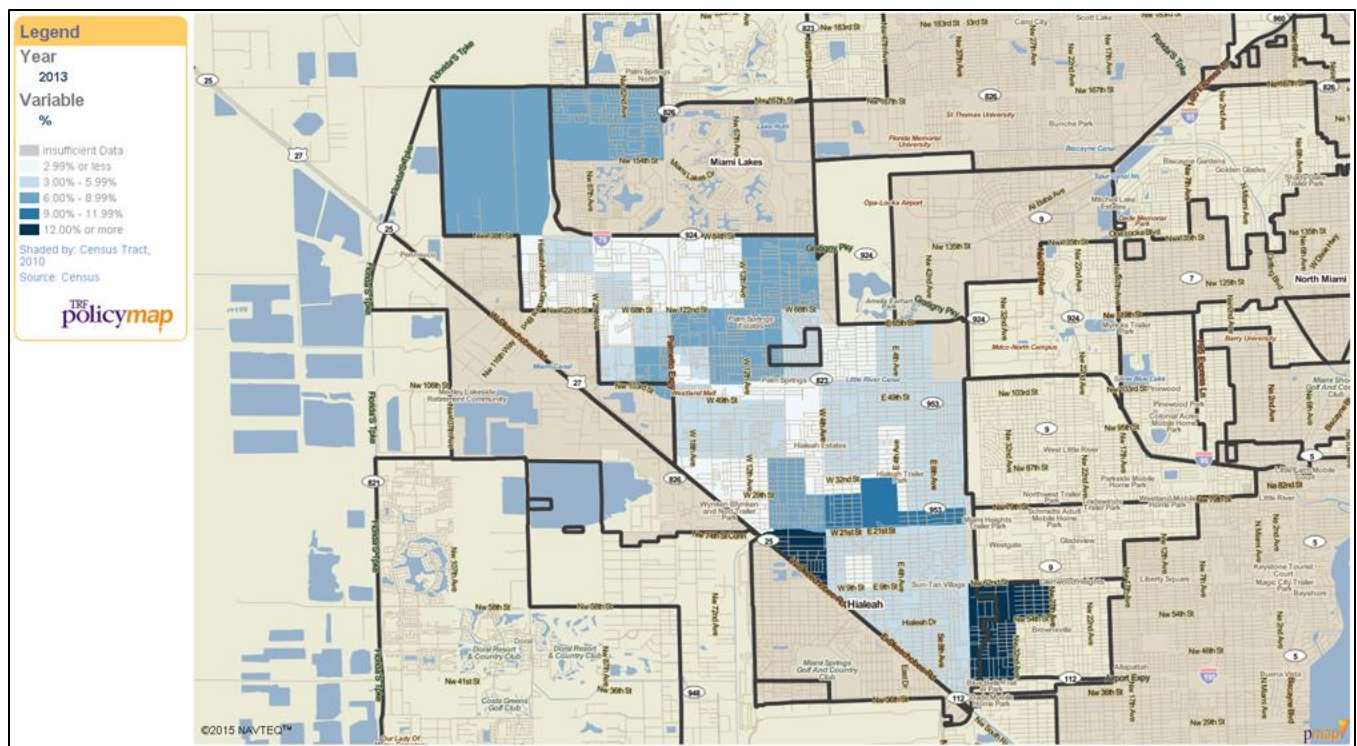
The following maps display the average travel time and commute time of more than one hour in Hialeah. Lighter shaded areas represent areas with less average travel time and commute time of more than one hour and darker shaded areas represent more average travel time and commute time of more than one hour.



## MAP: Average Travel Time to Work



## MAP: Commute Longer Than One Hour

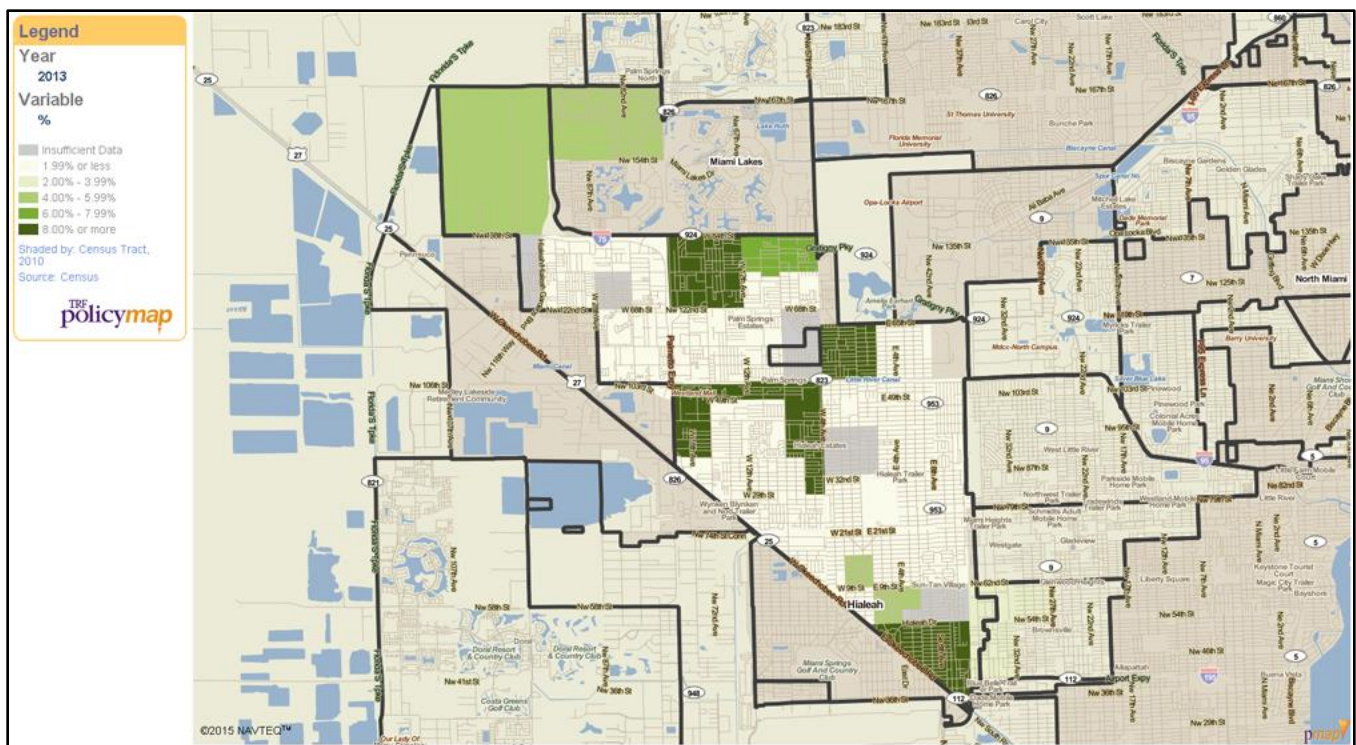


## Veterans

As of the 2009-2013 ACS, there were 2,382 veterans living in Hialeah. Of those, approximately 91.2 percent were male and approximately 8.8 percent were female. Hialeah veterans had higher incomes than the county's civilian population (over 18 and with an income), with veterans having a median income \$25,287 compared to the \$15,463 of non-veterans. Approximately 18.2 percent of Hialeah veterans are less than high school graduates compared to nonveterans at 30.6 percent. Approximately 36.7 percent of veterans have some college or associates degree, higher than nonveterans at 19.8 percent, however Hialeah non-veterans are more likely to have a bachelor's degree or higher than veterans. Veterans in the city experienced 12.2 percent unemployment rate in 2013, while non-veterans were at 13.3 percent. Finally, the city's veterans experience disabilities at a much higher rate than non-veterans, with the veteran disability rate at approximately 24.3 percent and the non-veteran rate at 14.8 percent.

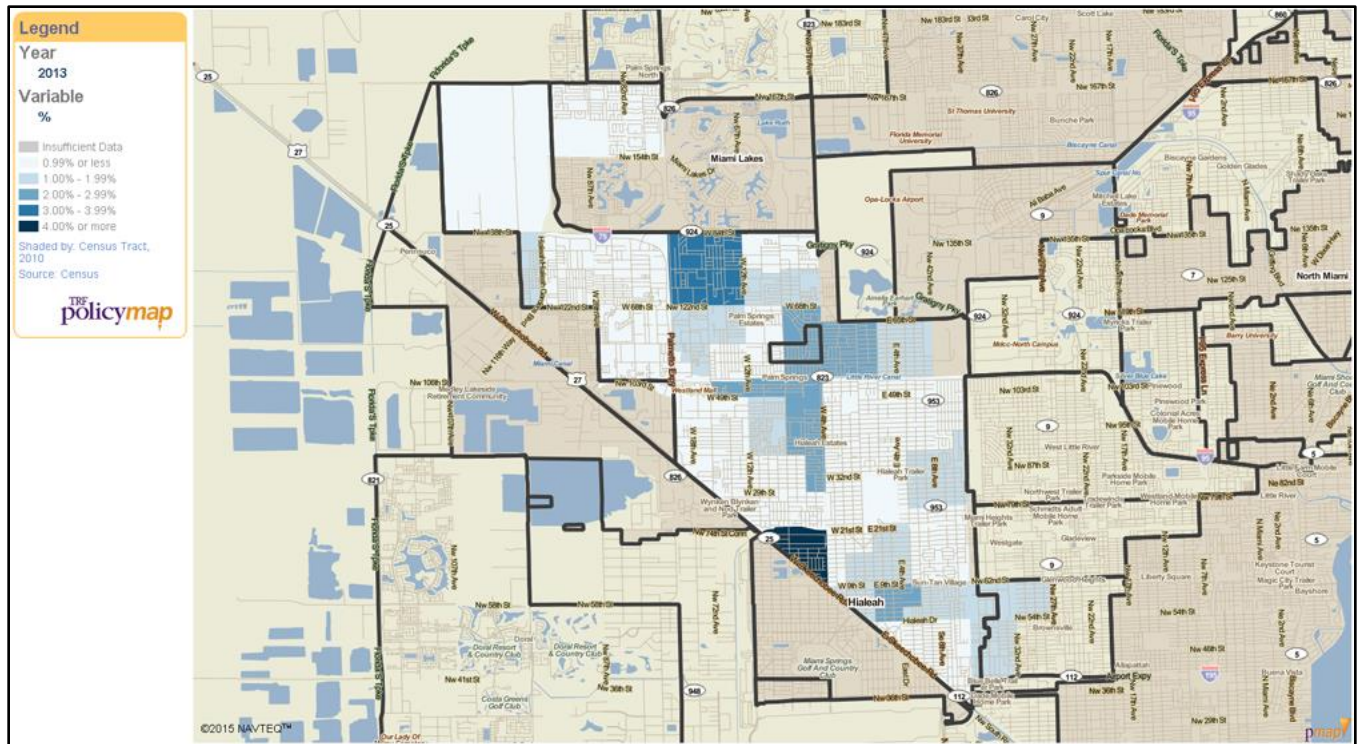
The following maps display the distribution of Black or African American and Hispanic veterans in Hialeah. Lighter shaded areas represent areas with fewer veterans and darker shaded areas represent areas with more veterans.

**MAP: Veterans Black or African American**





## MAP: Veterans Hispanic or Latino



## Housing Profile

### Housing Type & Size

According to the 2009-2013 American Community Survey estimates, 1-unit detached structures made up the largest percent of types of unit in Hialeah at 38.8% (28,665 units). The second largest unit type in the city is 1-unit attached structures at 11.7% (8,634 units). It should be noted that HUD's definition of multifamily is a structure with more than four housing units – single family is therefore not just a structure with one unit but also structures with up to four housing units (see note on the following page for further explanation).

<b>TABLE: Residential Properties by Type &amp; Number of Units</b>				
	<b>2000</b>		<b>2009-2013 ACS</b>	
<b>Property Type</b>	<b>Number</b>	<b>%</b>	<b>Number</b>	<b>%</b>
1-unit detached structure	27,828	38.5	28,665	38.8
1-unit, attached structure	9,249	12.8	8,634	11.7
2 units	1,558	2.2	1,279	1.7
3 or 4 units	3,985	5.5	3,816	5.2
5-9 units	3,985	5.5	4,950	6.7
10-19 units	4,954	6.9	6,640	9.0
20 or more units	19,642	27.3	18,876	25.6
Mobile Home	953	1.3	875	1.2
Boat, RV, van, etc.	39	<0.1	93	0.1
<i>Total</i>	72,193	100	73,828	100
Data Source: 2000 Census, 2009-2013 American Community Survey 5 Year Estimates				

Given HUD's definitions of single-family housing, the data shows that the most prevalent housing type in Hialeah is single-family, with 57.4% of all housing units being found in structures of one to four units.

## Housing Unit Size

Two bedroom units make up the largest portion of the city's housing stock at 37.4% of all units. The second largest housing size is 3 bedroom units at 31.2%. At 18.7% of the housing stock 1 bedroom unit's account for the third largest housing size in Hialeah. The table compares unit sizes from 2000 to 2013.

<b>TABLE: Housing Units by Size</b>				
	<b>2000</b>		<b>2009-2013 ACS</b>	
	<b>Number</b>	<b>%</b>	<b>Number</b>	<b>%</b>
No bedroom	12,981	18.0	2,054	2.8
1 bedroom	18,576	25.7	13,836	18.7
2 bedrooms	21,136	29.3	27,579	37.4
3 bedrooms	14,901	20.6	23,064	31.2
4 bedrooms	3,641	5.0	5,987	8.1
5 or more bedrooms	958	1.3	1,308	1.8
<b>Total Housing Units</b>	72,193	100	73,828	100
Data Source: 2000 Census, 2009-2013 American Community Survey 5 Year Estimates				



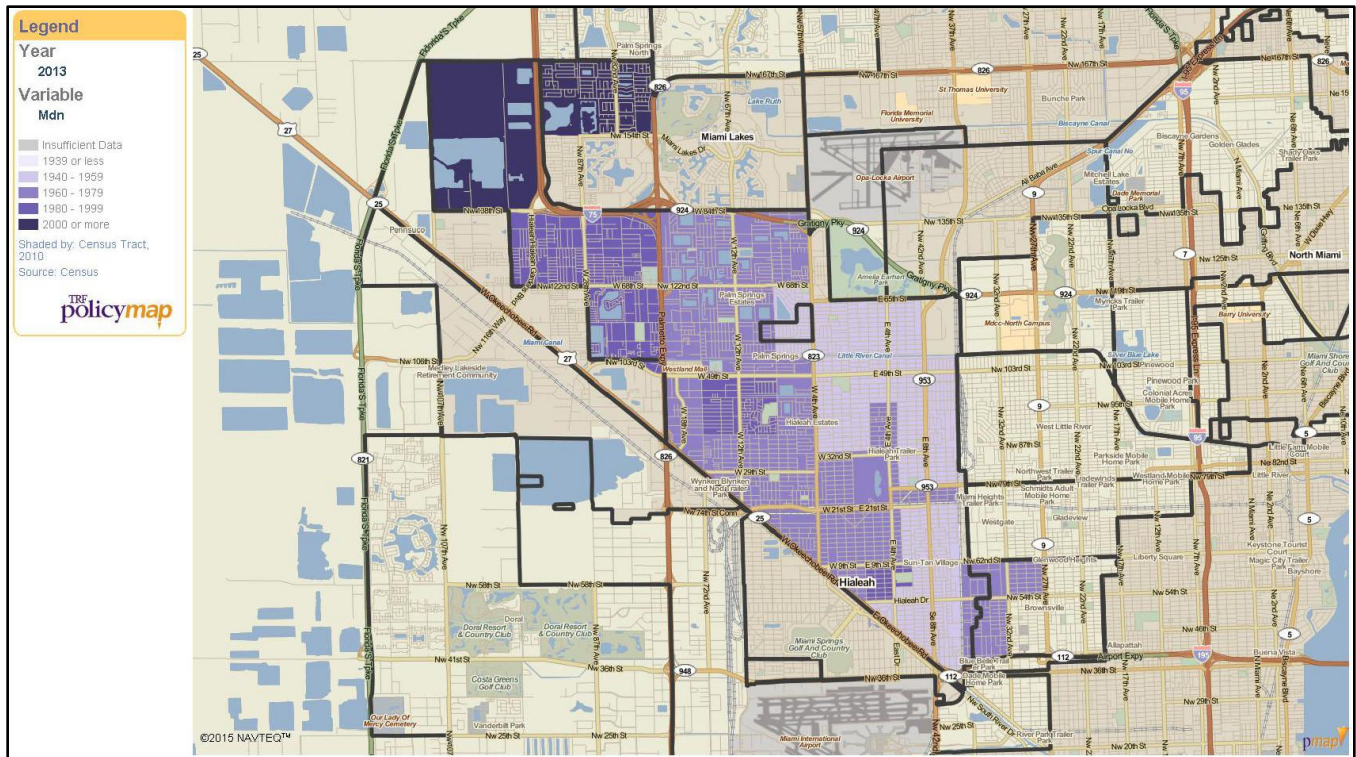
## Housing Conditions

The table below provides data on the age of Hialeah's housing stock by year cohort in comparison to the State of Florida. The largest cohort in the city is units built 1970-1979, comprising 27.1% of the city's housing stock (over 20,000 units). In comparison to the state as a whole, the largest cohort in the state is units built between 1980 and 1989 with 21.5% - nearly 20 million units.

<b>Table: Year Unit Built</b>				
	<b>Florida</b>		<b>Hialeah</b>	
<b>Range</b>	<b>Number</b>	<b>%</b>	<b>Number</b>	<b>%</b>
Built 2010 or Later	43,654	0.5%	116	0.2%
Built 2000-2009	1,841,941	20.5%	2,685	3.6%
Built 1990 to 1999	1,562,885	17.4%	7,762	10.5%
Built 1980 to 1989	1,936,813	21.5%	12,801	17.3%
Built 1970 to 1979	1,661,132	18.4%	20,037	27.1%
Built 1960 to 1969	879,534	9.8%	13,683	18.5%
Built 1940 to 1959	879,934	9.8%	15,994	21.7%
Built 1939 or earlier	198,040	2.2%	750	1.0%
<b>Total</b>	<b>9,003,933</b>	<b>100%</b>	<b>73,828</b>	<b>100%</b>
Data Source: American Community Survey 2009-2013 5 Year Estimates				

The housing stock in Hialeah is considerably older than the state as a whole. While 22.7% of the housing stock in the city was built in 1959 or earlier, the state as a whole saw 12.0% of the housing stock built in 1959 or earlier, nearly half of Hialeah. The city saw a significantly smaller percentage of new homes in comparison to the state as a whole. While the city experienced only 3.8% of units built in 2000 or later, the state as a whole saw 21.0% of units built in 2000 or later.

## MAP: Median Year Built



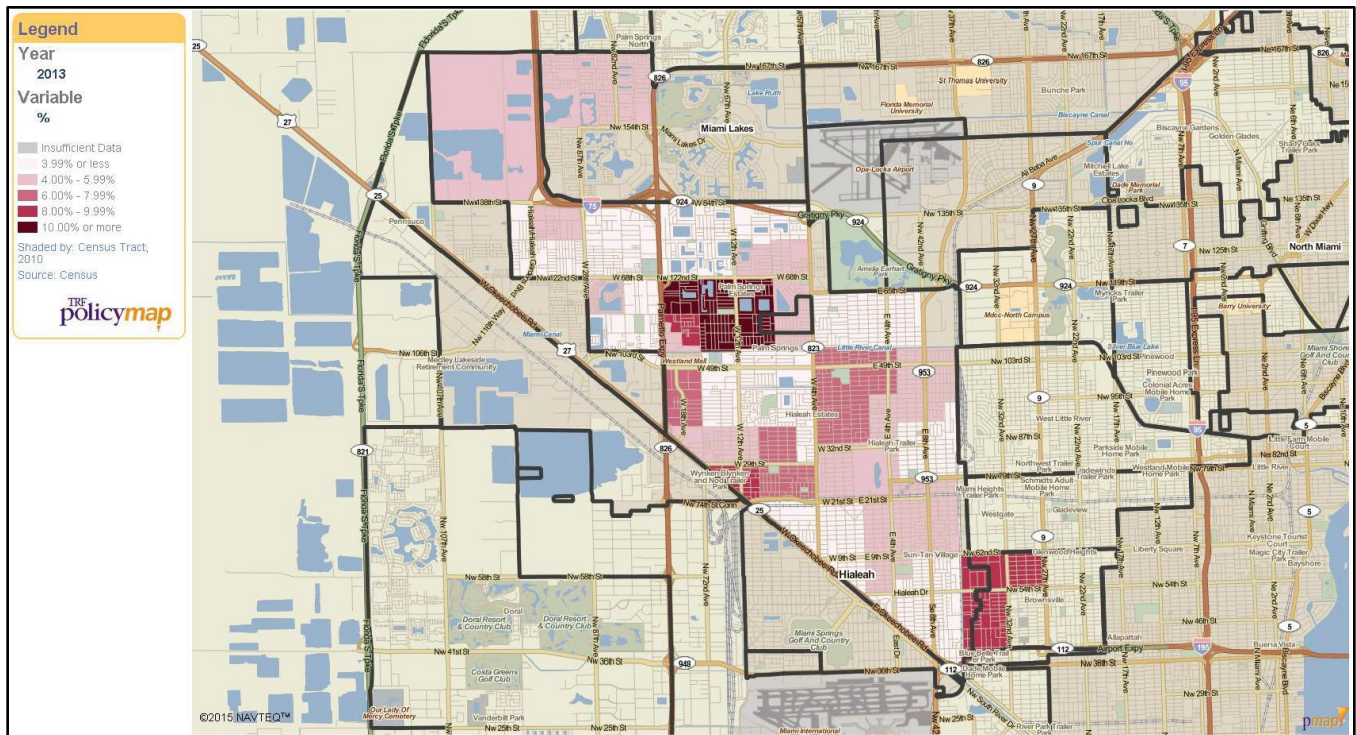
The lightest purple shaded areas represent where the median year built (MYB) for housing units was 1939 or before, and light purple shaded areas show where MYB is between 1940 and 1959. The medium purple shaded areas represent where MYB is between 1960 and 1979. The darker purple shaded areas represent where MYB is between 1980 and 1999 and the darkest purple shaded areas represent where MYB is 2000 or afterwards.

## Housing Occupancy Characteristics

<b>TABLE: Housing Occupancy</b>				
	<b>2000</b>		<b>2009-2013 ACS</b>	
<b>Housing Occupancy</b>	<b>Number</b>	<b>%</b>	<b>Number</b>	<b>%</b>
Total Housing Units	72,142	100	73,828	100
Occupied Housing Units	70,704	98.0	70,515	95.5
Owner Occupied Housing Units	35,846	50.7	35,471	50.3
Renter Occupied Housing Units	34,858	49.3	35,044	49.7
Data Source: Census 2000, American Community Survey 2009-2013 5 Year Estimates				

Since the 2000 Census, the number of housing units has increased 1,686 or slightly more than 2%. However, the percentage of occupied housing units has decreased, as well as the percentage of occupied housing units that are owner-occupied. The overall occupancy rate has declined from 98.0% to 95.5% and owner-occupancy has decreased from 50.7% to 50.3%. On the other hand, the percentage of occupied housing units that are occupied by renters has increased from 49.3% to 49.7% of all occupied housing units. The map below depicts residential vacancy rates by census tract for the city.

## MAP: Residential Vacancy Rate

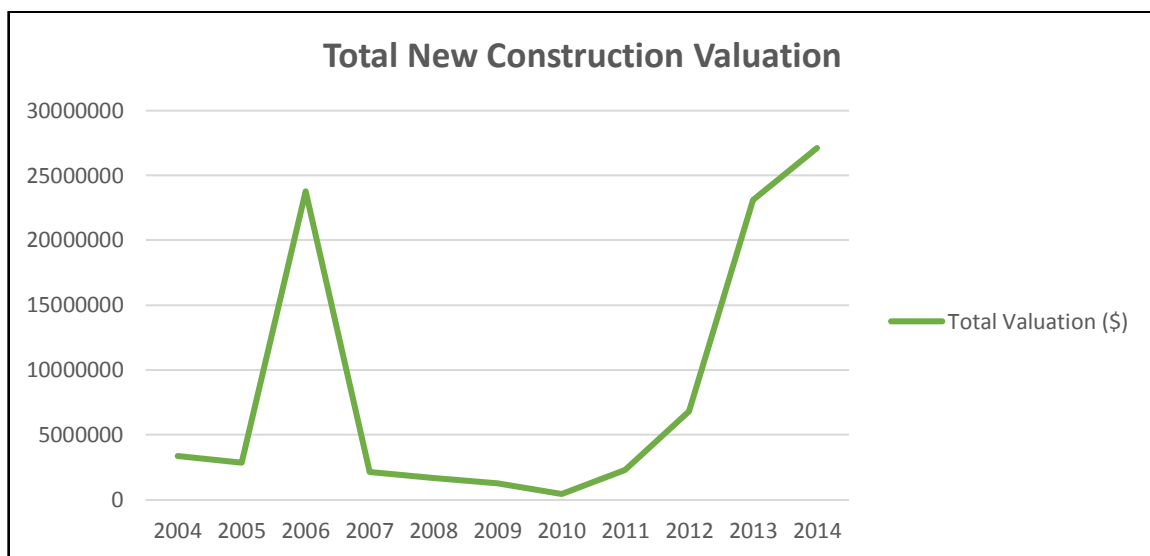
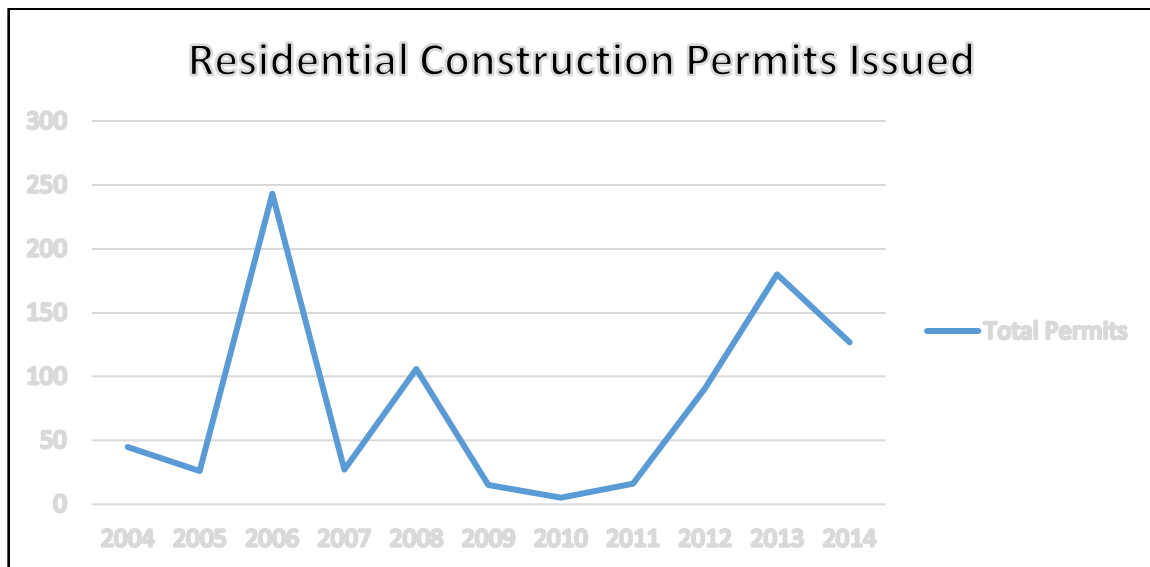


The lightest red shaded areas represent where the vacancy rate is 3.99% or less, and light red shaded areas represent where the vacancy rate is between 4.00% and 5.99%. The medium red shaded areas represent where the vacancy rate is between 6.00% and 7.99%. The darker red shaded areas represent where the vacancy is between 8.00% and 9.99% and the darkest red shaded areas represent where the vacancy rate is 10.00% or more.



## Construction Activity

The line graphs below depict perhaps the best representation of the collapse of the housing boom and very slow recovery between 2004 and 2013 throughout the Hialeah. The first graph displays the steep decline in the number of residential building permits issued each year between 2004 and 2013. 2006 is an outlier where a large number of permits were issued, primarily to Five or More Family Units. The second graph details the precipitous drop in the total valuation of new construction building permits each year during the same period, again, with 2006 being an outlier.



## Housing Market and Demand

**TABLE: Annual Housing Sales**

	2006	2007	2008	2009	2010	2011	2012	2013
Number of Sales	N/A	2,370	1,185	1,552	3,097	2,342	2,068	2,627

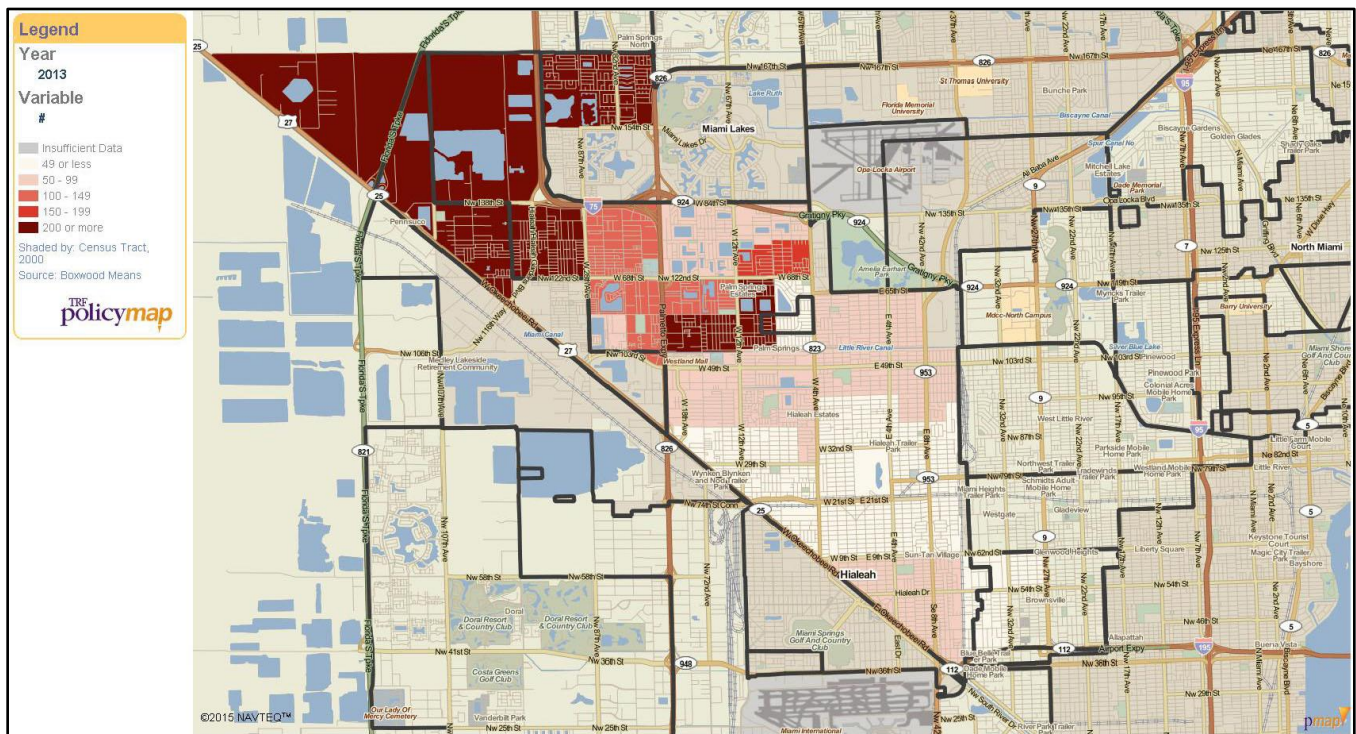
Data Source: Boxwood Means Inc. via PolicyMap

**TABLE: Median Sales Price**

	2006	2007	2008	2009	2010	2011	2012	2013
Median Price	N/A	\$210,000	\$150,000	\$87,000	\$58,000	\$62,650	\$78,000	\$92,000

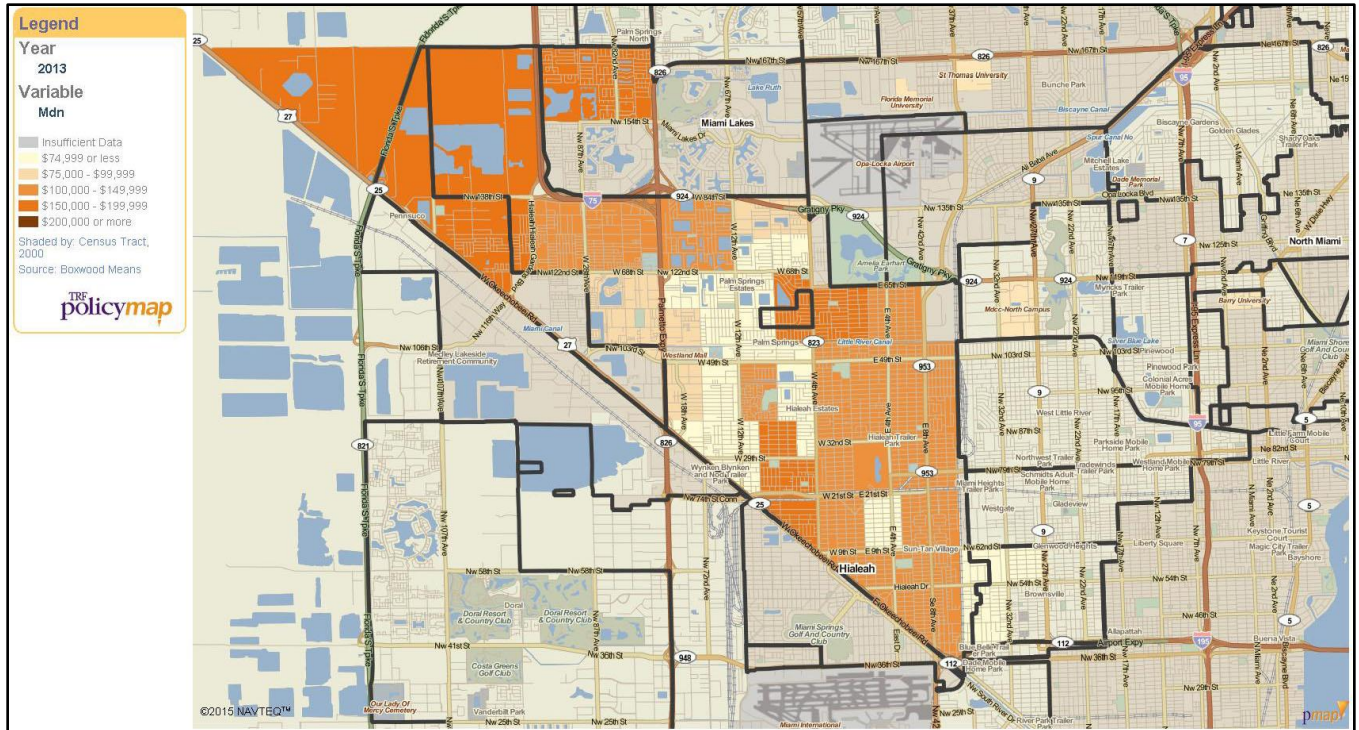
Data Source: Boxwood Means Inc. via PolicyMap

**MAP: Annual Home Sales**



The lightest red shaded areas represent where annual home sales were 49 or less, and light red shaded areas show where annual home sales were between 50 and 99. The medium red shaded areas represent where annual home sales were between 100 and 149. The darker red shaded areas represent where annual home sales were between 150 and 199 and the darkest red shaded areas represent where annual home sales were 200 or more.

## MAP: Median Sales Price



The lightest orange shaded areas represent where the median sales price was \$74,999 or less, and light orange shaded areas show where the median sales price was between \$75,000 and \$99,999. The medium orange shaded areas represent where the median sales price was between \$100,000 and \$149,999. The darker orange shaded areas represent where the median sales price was between \$150,000 and \$199,999, and the darkest orange shaded areas represent where the median sales price was \$200,000 or more.

## Housing Costs

The following section examines the housing costs for owners and renters across the City of Hialeah. The data tables provide a comparison between the 2000 Census and the 2009-2013 American Community Survey 5-Year Estimates. There are several instances where the way the data was collected and/or reported has changed between the two surveys. In each case, a data note is provided to clarify the data sets being presented.

<b>TABLE: Change in Cost of Housing</b>			
	<b>2000</b>	<b>2009-2013 ACS</b>	<b>% Change</b>
Median Home Value	\$113,900	\$161,200	41.5%
Median Contract Rent	\$614	\$989	61.1%
Data Source: 1990, 2000 Census & 2009-2013 American Community Survey 5 Year Estimates			

Housing costs across the city have experienced significant increases between 2000 and 2013. Median home values for owner occupied homes, has increased over 40% and the median rent has increased more than 60% across the city. As detailed above, new unit production is only a fraction of what it once was and thus the relatively fewer units coming to market each year has added to the upward pricing for both owner and renter options.

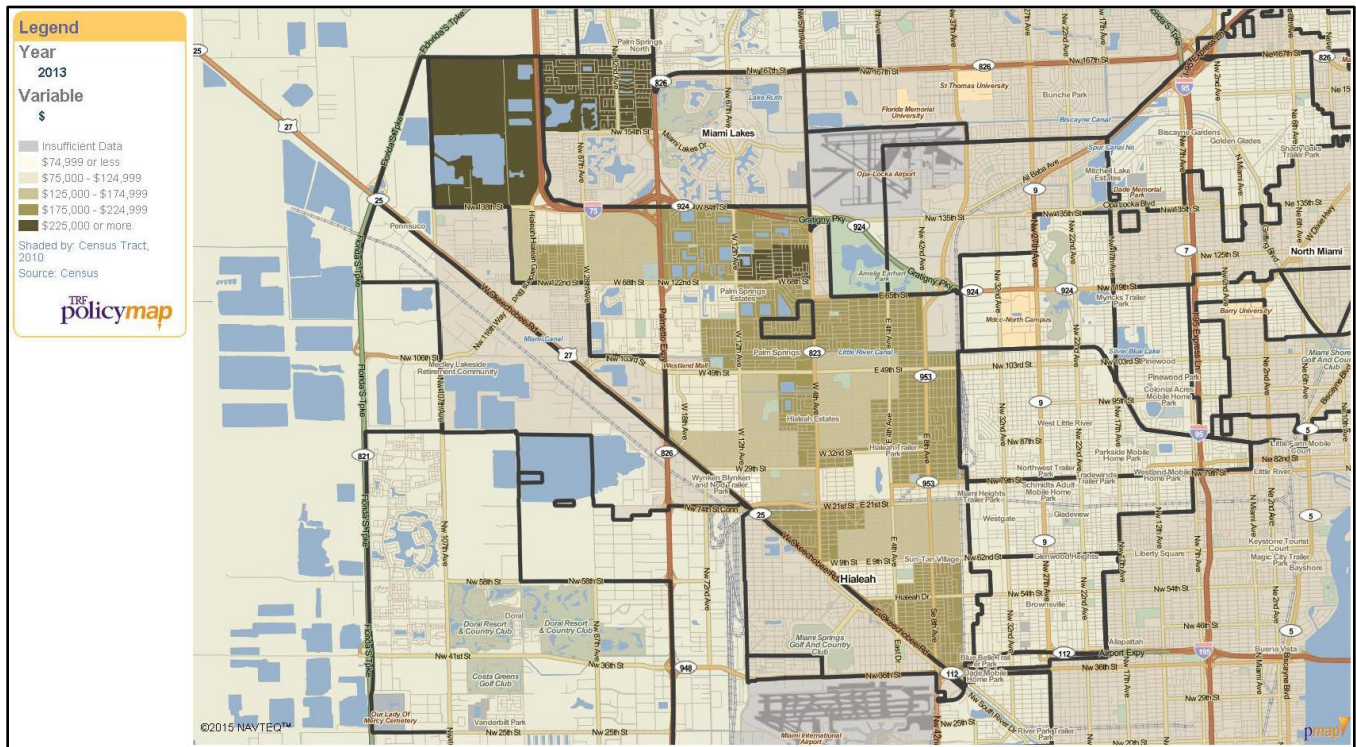
The table below compares 2000 and 2013 home value cohort data for the city. The general trend over time is that lower value cohorts are accounting for smaller portions of the housing stock while higher value cohorts are accounting bigger shares. This is to be expected in light of the 41.5% growth in home values since 2000.

<b>TABLE: Median Home Value (owner Occupied Units)</b>				
	<b>2000</b>		<b>2009-2013 ACS</b>	
<b>Value</b>	<b>Number</b>	<b>%</b>	<b>Number</b>	<b>%</b>
Less than \$50,000	282	1.0	1,566	4.4
\$50,000 to \$99,999	9,498	34.5	6,543	18.4
\$100,000 to \$149,999	13,574	49.3	7,025	19.8
\$150,000 to \$199,999	3,698	13.4	9,156	25.8
\$200,000 to \$299,999	436	1.6	8,372	23.6
\$300,000 to \$499,999	48	0.2	2,534	7.1
\$500,000 to \$999,999	0	0.0	203	0.6
\$1,000,000 or more	12	0.0	72	0.2
<b>Total Units/Median Value</b>	<b>27,548</b>	<b>\$113,900</b>	<b>35,471</b>	<b>\$161,200</b>
Data Source: 2000 Census, 2009-2013 American Community Survey 5 Year Estimates				



The map below displays the distribution of home values throughout Hialeah.

### MAP: Median Home Value



While the median home value in Hialeah was \$161,200, the median home value varied widely throughout the city (2013 ACS). The lightest green shaded areas represent where median home values were \$74,999 or less, and light green shaded areas show where median home values were between \$75,000 and \$124,999. The medium green shaded areas represent where median home values were between \$125,000 and \$174,999. The darker green shaded areas represent where median home values were between \$175,000 and \$224,999 and the darkest green shaded areas represent where median home values were \$225,000 or more.

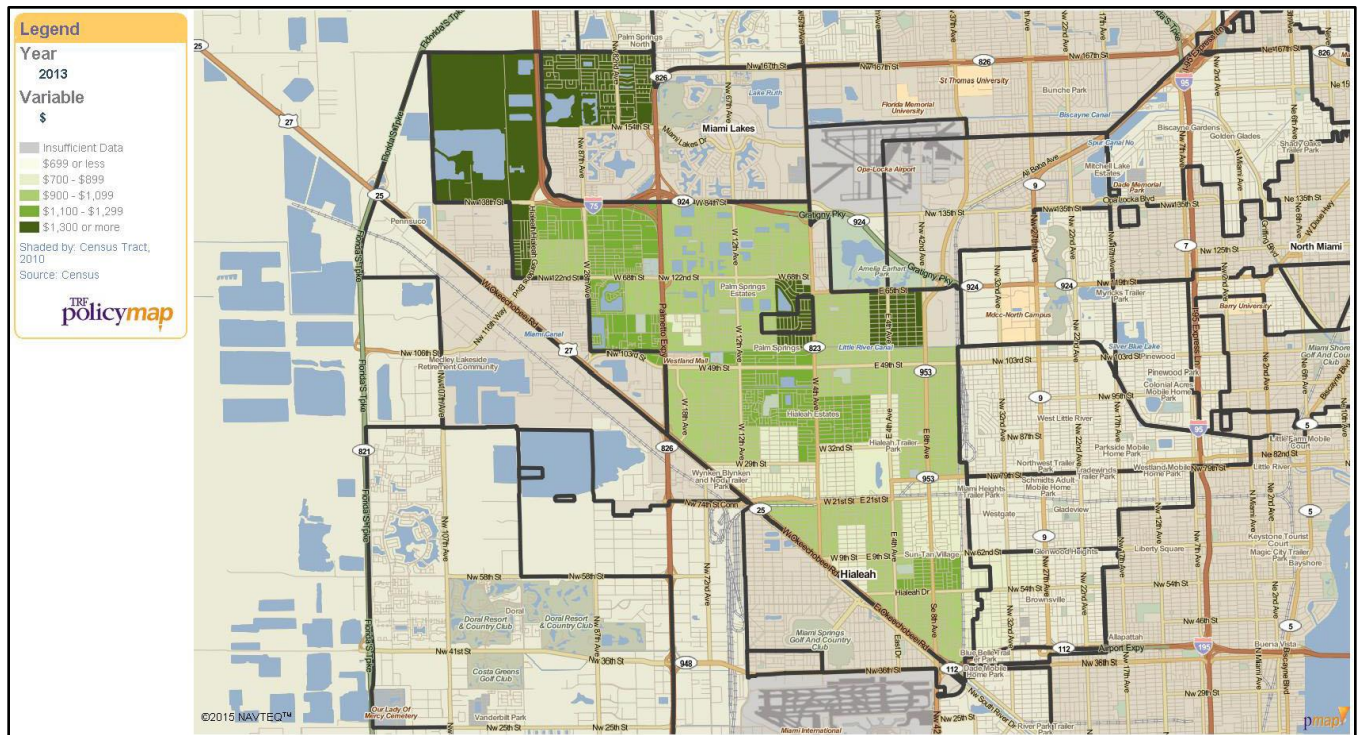
The table below compares 2000 and 2013 rent cohort data for Hialeah. The general trend over time is that lower rent cohorts are accounting for smaller portions of the housing stock while higher rent cohorts are accounting bigger shares. A notable exception to this is the group “No rent paid” which has grown nearly five-fold since 2000. This is to be expected in light of the 61.1% growth in rents since 2000.

<b>TABLE: Rental Housing Costs</b>				
	<b>2000</b>		<b>2009-2013 ACS</b>	
<b>Rent Paid</b>	<b>Number</b>	<b>%</b>	<b>Number</b>	<b>%</b>
No rent paid	444	1.3	1,183	6.2
Less than \$200	2,314	6.7	1,484	2.0
\$200-299	1,336	3.8	1,552	4.1
\$300-499	5,741	16.5	1,843	9.5
\$500-749	17,077	49.1	3,312	24.5
\$750-999	6,317	18.2	9,144	25.0
\$1,000-\$1,499	1,389	4.0	13,868	20.1
\$1,500 or more	150	0.4	2,658	8.0
<b>Total Units/Median Rent</b>	<b>34,768</b>	<b>\$614</b>	<b>33,861</b>	<b>\$989</b>
Data Source: 2000 Census, 2009-2013 American Community Survey 5 Year Estimates				

Data note: Median Rent is calculated based only on those renters actually paying rent.

The map below displays the distribution of home values throughout Hialeah.

### MAP: Median Rent



While the median rent in Hialeah was \$989, the median rent varied throughout the city (2013 ACS). The lightest green shaded areas represent where median rent was \$699 or less, and light green shaded areas show where median rent was between \$700 and \$899. The medium green shaded areas represent where median rent was between \$900 and \$1,099. The darker green shaded areas represent where median rent was between \$1,100 and \$1,299 and the darkest green shaded areas represent where median rent was \$1,300 or more.



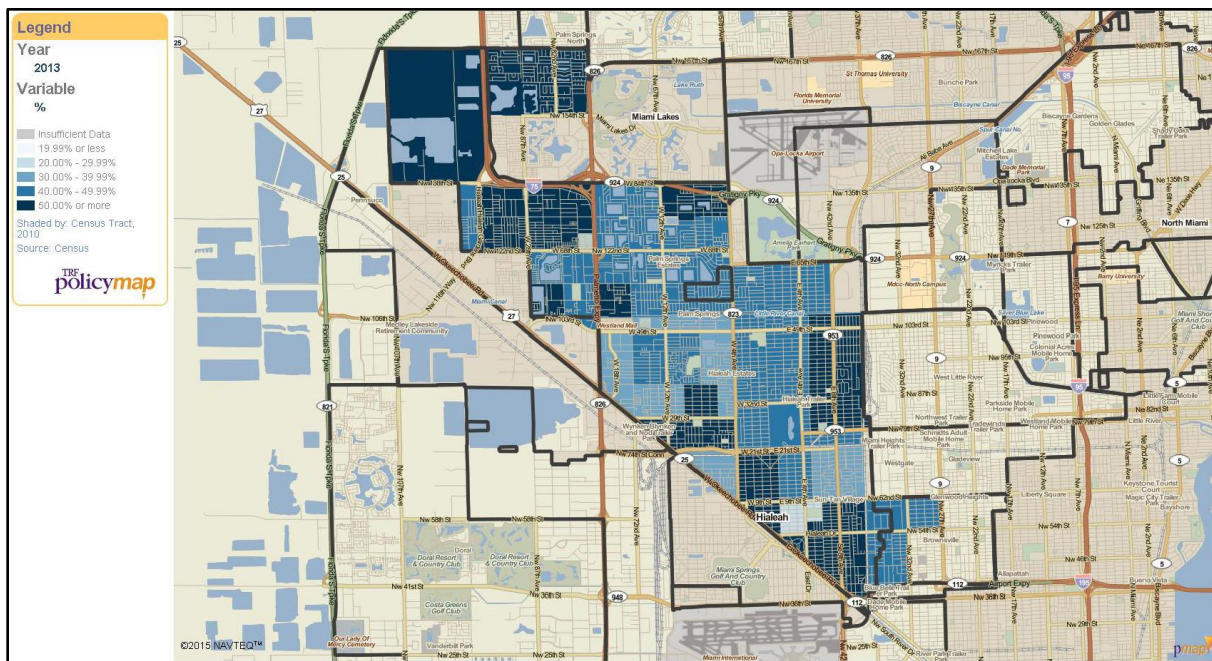
## Housing Affordability

By HUD's definition, households paying in excess of 30% of their household income towards housing costs (renter or owner) are said to be cost burdened. The table below details the percentage of households that are defined as cost burdened.

<b>TABLE: Selected Monthly Owner Costs As A Percentage of Household Income</b>		
Monthly Owner Costs as Percentage of Household Income	<b>2009-2013 ACS (owners with mortgage)</b>	
	<b>Number</b>	<b>%</b>
Less than 20%	3,594	16.1
20 to 24%	2,583	11.5
25 to 29%	2,340	10.5
30 to 35%	2,190	9.4
35% or more	11,752	52.5
Not computed	197	-
Data Source: 2009-2013 American Community Survey 5 Year Estimates		

The map below depicts concentrations of cost burdened owner occupied households.

**MAP: Cost Burdened Homeowners**



The lightest blue shaded areas represent where the concentration of cost burdened homeowners is 19.99% or less, and light blue shaded areas show where the concentration of cost burdened homeowners is between 20.00% and 29.99%. The medium blue shaded areas show where the concentration of cost burdened homeowners is between 30.00% and 39.99%. The darker blue shaded

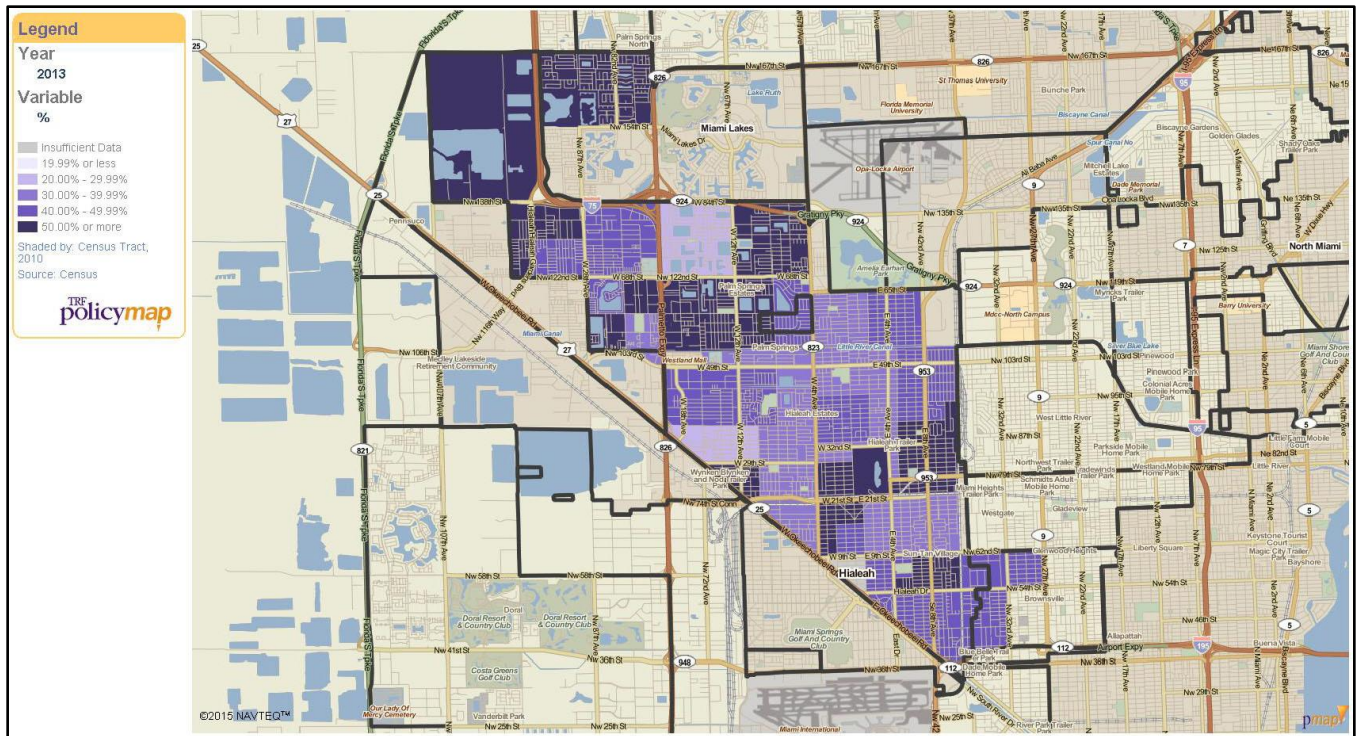


areas show where the concentration of cost burdened homeowners is between 40.00% and 49.99% and the darkest blue shaded areas show where the concentration of cost burdened homeowners is over 50.00% or more in the city.

<b>TABLE: Selected Monthly Owner costs as a Percentage of Household Income</b>		
Monthly Owner Costs as Percentage of Household Income	2009-2013 ACS (owners without mortgage)	
	Number	%
Less than 10%	3,309	26.1
10.0 to 14.9%	2,333	18.4
15.0 to 19.9%	1,717	13.5
20.0 to 24.9%	1,306	10.3
25.0 to 29.9%	755	5.9
30.0 to 34.9%	531	4.2
35.0% or more	2,747	21.6
Not computed	198	-
Data Source: 2000 Census, 2009-2013 American Community Survey 5 Year Estimates		

The 2009-2013 ACS report specifically identifies housing costs for owner occupied households without a mortgage. In such case, housing costs are most often attributable to homeowner's insurance premiums and property taxes. As indicated in the table above, 25.8% of owner occupied households, without a mortgage are cost burdened, including 21.6% that were considered extremely cost burdened. There is a strong correlation between these cost burdened owner occupied households and cost burdened seniors who own their homes. The map below identifies concentrations of cost burdened owners age 65 and older.

## MAP: Cost Burdened Homeowners 65 years old or older

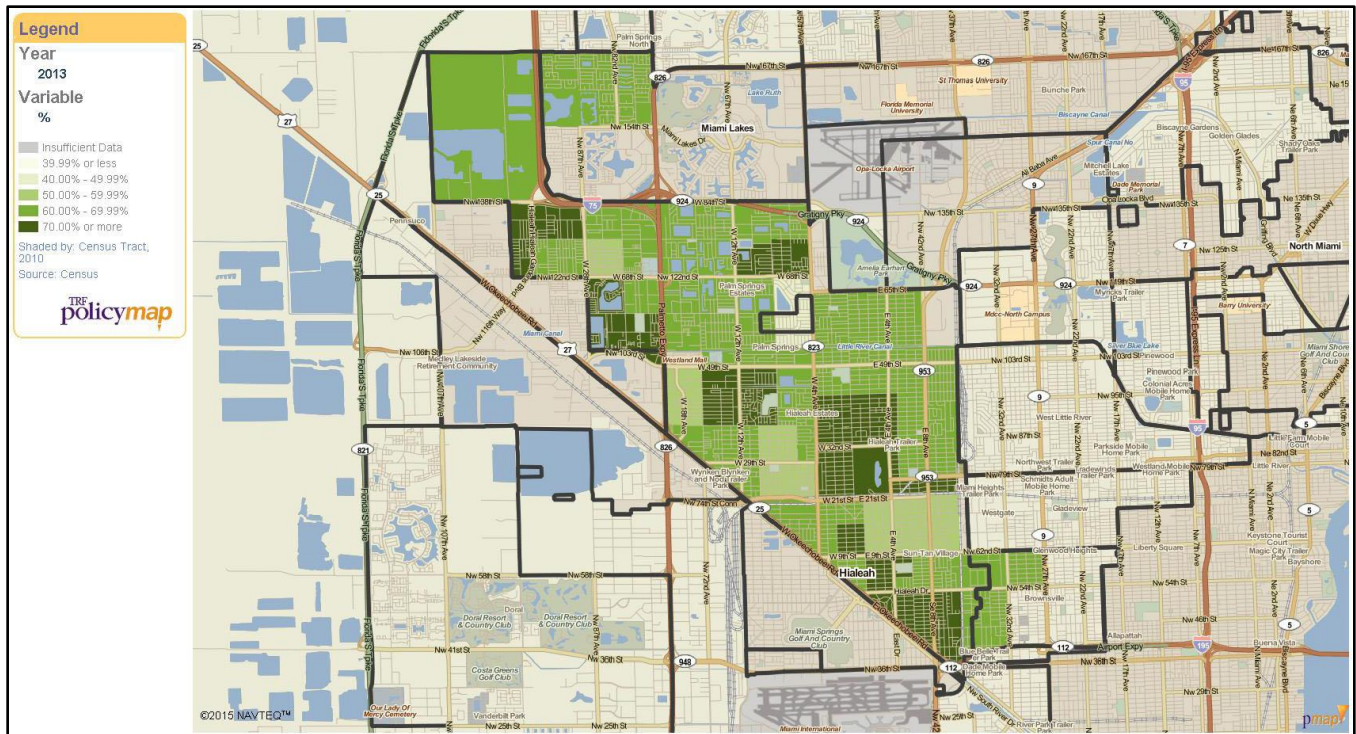


The lightest purple shaded areas represent where the concentration of cost burdened homeowners 65 years of older is 19.99% or less, and light purple shaded areas show where the concentration of cost burdened homeowners 65 years of older is between 20.00% and 29.99%. The medium purple shaded areas show where the concentration of cost burdened homeowners 65 years of older is between 30.00% and 39.99%. The darker purple shaded areas show where the concentration of cost burdened homeowners 65 years of older is between 40.00% and 49.99% and the darkest purple shaded areas show where the concentration of cost burdened homeowners 65 years of older is over 50.00% or more in the city.

<b>TABLE: Selected Monthly Renter costs as a Percentage of Household Income</b>				
Monthly Renter Costs as a % of Household Income	2000 (all renters)		2009-2013 ACS (occupied units paying rent)	
	Number	%	Number	%
Less than 15%	3,776	10.9	1,189	3.6
15 to 19%	3,872	11.1	1,699	5.2
20 to 24%	4,341	12.5	2,707	8.3
25 to 29%	3,942	11.3	3,650	11.2
30 to 35%	2,855	8.2	3,184	9.7
35% or more	14,496	41.7	20,302	62.0
Not computed	1,486	4.3	2,313	-
Data Source: 2000 Census, 2009-2013 American Community Survey 5 Year Estimates				

Data note: the 2000 Census includes all renters, even those not paying rent and those were calculations could not be made, in the percentages for each income range. However, the 2009-2013 ACS only includes occupied units paying rent, where the calculations could be made, in the percentages for each income range. Therefore, some of the increase between the 2000 Census and the 2009-2013 ACS can be attributed to the change in the way the Census Bureau reports these figures. Nonetheless, in 2000, 49.9% of all renters were considered cost burdened including 41.7% that were considered extremely cost burdened. As of the 2013 calculations, nearly three-quarters (71.7%) of all renters, paying rent, were cost burdened including 62.0% that were considered extremely cost burdened. Again, at least some of the significant increase from year to year can be attributed to the change in the way the data is presented but that should not lessen the significance of such a high percentage of renter households facing extreme cost related burdens. When renter households face these extreme cost burdens they are less likely to be able to save money towards becoming homeowners and they are more likely to experience poverty conditions. The following map details concentrations of cost burdened renter households. The second map below further identifies concentrations of cost burdened renter households with occupants aged 65 or older.

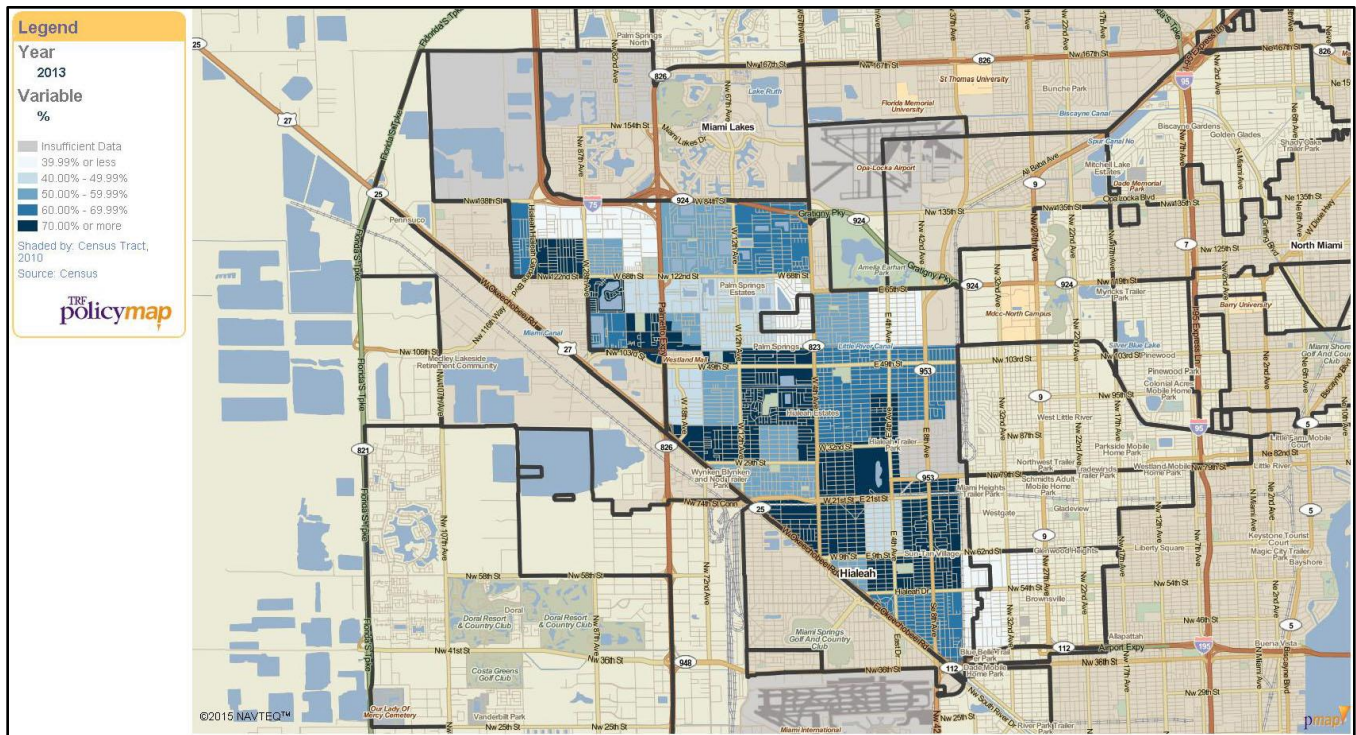
## MAP: Cost Burdened Renters



The lightest green shaded areas represent where the concentration of cost burdened renters is 39.99% or less, and light green shaded areas show where the concentration of cost burdened renters is between 40.00% and 49.99%. The medium green shaded areas show where the concentration of cost burdened renters is between 50.00% and 59.99%. The darker green shaded areas show where the concentration of cost burdened renters is between 60.00% and 69.99% and the darkest green shaded areas show where the concentration of cost burdened renters is over 70.00% or more in the city.



## MAP: Cost Burdened Renters 65 years old or older



The lightest blue shaded areas represent where the concentration of cost burdened renters 65 years of older is 39.99% or less, and light blue shaded areas show where the concentration of cost burdened renters 65 years of older is between 40.00% and 49.99%. The medium blue shaded areas show where the concentration of cost burdened renters 65 years of older is between 50.00% and 59.99%. The darker blue shaded areas show where the concentration of cost burdened renters 65 years of older is between 60.00% and 69.99% and the darkest blue shaded areas show where the concentration of cost burdened renters 65 years of older is over 70.00% or more in the city.

## Property Tax and Insurance

Property taxes can have a strong impact on both owners and renters. Owners will pay taxes on their property, while renters have property tax pushed on to them by the property owners. Property taxes in Florida are some of the highest in the nation, which is bad for homeowners, as well as renters. Many renters live in an owner's "second home" which has a higher tax rate that is pushed on to renters. In 2010 the state median real estate tax was 1.09% and the median amount paid in the state is \$1,791. Miami-Dade County was even higher with a median tax rate of 1.25% and a median amount paid of \$2,590. As a reference, the median tax rate paid in the United States is \$2,043 and the tax rate is 1.14%. Residents of Miami-Dade taxes paid as a percentage of median income is 4.81%, which is higher than the state average of 3.38% and the national average of 3.25%.

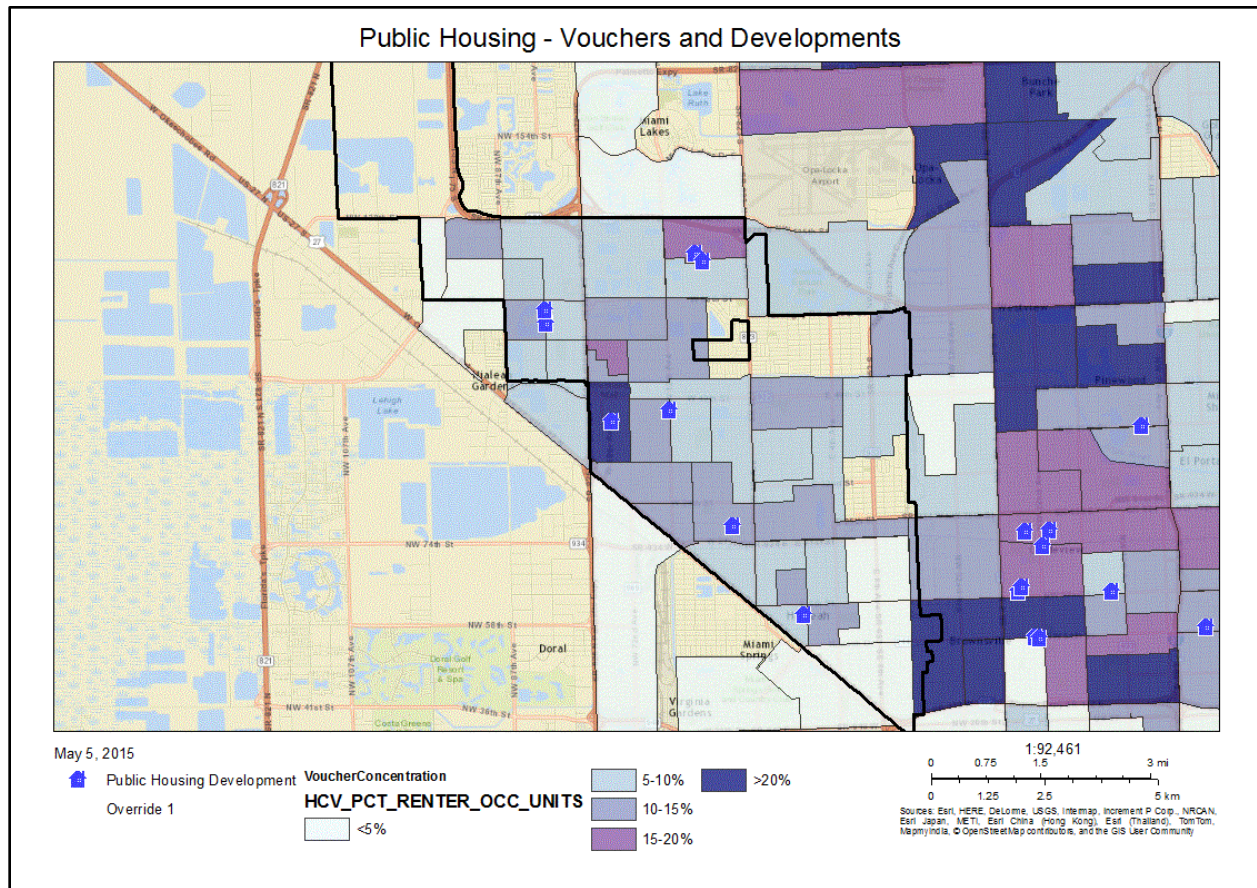
Home insurance is also an added cost that affects the cost of housing. In Florida the median home insurance rate is \$1,991 annually. This is 98% higher than the national average. In addition, Miami-Dade County has areas designated as flood plains, which require additional insurance. According to FEMA the average rate for flood plain insurance is \$500 per year.

## Public Housing

The Hialeah Housing Authority (HHA) was created in 1967 to oversee Assisted and Subsidized Housing for low-income households in the city of Hialeah. The HHA provides housing assistance to over 6,607 low-income families through the Affordable Housing Program, Housing Choice Voucher (Section 8) Program, Palm Centre, and Public Housing Program. Currently, the waiting lists for Public Housing, Affordable Housing and the Section 8 Program are closed, and no applications are available. In June 2014, over 54,000 applications for the Section 8 Program were received but only 2,500 were selected by a computerized lottery. HHA's portfolio currently includes: 545 Affordable Housing units, 402 Conventional Housing units, 1,117 Public Housing units, and 4,543 Section 8 Housing Vouchers.

All of the Hialeah's Public Housing, Affordable Housing and Conventional developments are located near the southeast-to-northwest border with developments noticeably absent from the northeast area of the City. As the below map shows the vouchers tend to be huddled around areas with high public housing developments. HHA's Public Housing consists of six Elderly Buildings and six family buildings.

## MAP: Public Housing and Vouchers



The HHA has an excellent track record obtaining a High Performer status in both Section 8 and Public Housing for the past five years. The Hot Lunch program, which serves over 1,200 seniors and is active at every senior Public Housing building, is one of the highlights. The HHA's Public Housing is currently 100% occupied and has an active waiting list of applicants. Another HHA program is the Family Self Sufficiency (FSS) Program, which helps residents attain success in their financial future. Participants sign a contract to be part of the FSS for five years and they are compensated monetarily at the end of the program. The money received can be used to purchase a car or as a down payment on a house. The FSS Program provides information and resources to residents on how to repair their credit and puts them in touch with realtors and bank. HHA is also currently working to revitalize 56 units in order to comply with HUD. Staff from the Social Services Department also visits the sites of all HHA buildings weekly to promote activities being offered throughout the month.



## Home Mortgage Disclosure Act Reporting (HMDA)

### Lending Practices

An analysis of lending practices is possible through an examination of data gathered from lending institutions in compliance with the Home Mortgage Disclosure Act (HMDA). The HMDA was enacted by Congress in 1975 and is implemented by the Federal Reserve Board as Regulation C. The intent of the Act is to provide the public with information related to financial institution lending practices and to aid public officials in targeting public capital investments to attract additional private sector investments.

Since enactment of the HMDA in 1975, lending institutions have been required to collect and publicly disclose data regarding applicants including: location of the loan (by Census tract and MSA); income, race and gender of the borrower; the number and dollar amount of each loan; property type; loan type; loan purpose; whether the property is owner-occupied; action taken for each application; and, if the application was denied, the reason(s) for denial. Property types examined include one-to-four family units, manufactured housing and multi-family developments.

HMDA data is a useful tool in accessing lending practices and trends within a jurisdiction. While many financial institutions are required to report loan activities, it is important to note that not all institutions are required to participate. Depository lending institutions – banks, credit unions, and savings associations – must file under HMDA if they hold assets exceeding the coverage threshold set annually by the Federal Reserve Board, have a home or branch office in one or more metropolitan statistical areas (MSA), originated at least one home purchase or refinancing loan on a one-to-four family dwelling in the preceding calendar year. Such institutions must also file if they meet any one of the following three conditions: is a federally insured or regulated institution; originates a mortgage loan that is insured, guaranteed, or supplemented by a federal agency; or originates a loan intended for sale to Fannie Mae or Freddie Mac. For-profit, non-depository institutions (such as mortgage companies) must file HMDA data if: their value of home purchase or refinancing loans exceeds 10% or more of their total loan originations or equals or exceeds \$25 million; they either maintain a home or branch office in one or more MSAs or in a given year execute five or more home purchase, home refinancing, or home improvement loan applications, originations, or loan purchases for properties located in MSAs; or hold assets exceeding \$10 million or have executed more than 100 home purchase or refinancing loan originations in the preceding calendar year.

It is recommended that the analysis of HMDA data be tempered by the knowledge that no one characteristic can be considered in isolation, but must be considered in light of other factors. For instance, while it is possible to develop conclusions simply on the basis of race data, it is more accurate when all possible factors are considered, particularly in relation to loan denials and loan pricing. According to the FFIEC, “with few exceptions, controlling for borrower-related factors reduces the



differences among racial and ethnic groups.” Borrower-related factors include income, loan amount, lender, and other relevant information included in the HMDA data. Further, the FFIEC cautions that the information in the HMDA data, even when controlled for borrower-related factors and the lender, “is insufficient to account fully for racial or ethnic differences in the incidence of higher-priced lending.” The FFIEC suggests that a more thorough analysis of the differences may require additional details from sources other than HMDA about factors including the specific credit circumstances of each borrower, the specific loan products that they are seeking, and the business practices of the institutions that they approach for credit.

Typically HMDA data is made available at the Metropolitan Statistical Area or MSA level, making a review of local-level data somewhat cumbersome. In the following section this report provides a summary of the 2013 HMDA data available for the City of Hialeah. Where specific details are available, a summary is provided below for loan denials including information regarding the purpose of the loan application and the primary reason for denial. For the purposes of analysis, this report will focus only on the information available and will not make assumptions regarding data that is not available or was not provided as part of the mortgage application or in the HMDA reporting process.

In 2013, residents of the City of Hialeah applied for roughly 971 home purchase loans. Of those applications, 555 or 57% were approved and originated. Of the remaining 416 applications 234 or 24% of applicants were denied for reasons identified below. It is important to note that financial institutions are not required to report reasons for loan denials, although many do so voluntarily. Also, while many loan applications are denied for more than one reason, HMDA data reflects only the primary reason for the denial of each loan. The balance of the applications that were not originated nor denied, 182 “other” applications were closed for one reason or another including a) the loan was approved but not accepted by the borrower, b) the application was closed because of incomplete information or inactivity by the borrower or c) in many instances the application may have been withdrawn by the applicant. The table below identifies the home purchase applicants, and the disposition of those applications by the primary race of the applicant.

<b>TABLE: All Applications for Home Purchase Loan Approval/Denial by Race, 2013</b>				
	Application Count			Approval Rate
Applicant Race	Loan Originated	Application Denied	Other*	Percentage
American Indian or Alaska Native	-	-	1	0.0%
Asian	3	2	-	60%
Black or African American	8	3	3	57%
Native Hawaiian or Other Pacific Islander	1	-	-	100%
White	527	209	163	58%
Information not provided	9	20	12	22%
Not applicable	7	-	3	70%
<b>Total</b>	<b>555</b>	<b>234</b>	<b>182</b>	<b>57%</b>
Source: 2013 HMDA via the Shimberg Center for Housing Studies & Florida Housing Data Clearinghouse				
* "Other" includes applications that were approved but not accepted, applications withdrawn by the applicant, and files closed for incompleteness.				

Of those that provide race information, White applicants were the most prominent making up 92% of the home purchase loan applicant pool. The overall approval rate was 57% for all applicants in Hialeah. Both Whites and Blacks had similar approval rates at 58% and 57% respectively.

<b>TABLE: All Applications for Home Purchase Loan Approval/Denial by Hispanic/Latino Ethnicity, 2013</b>				
	Application Count			Approval Rate
Applicant Ethnicity	Loan Originated	Application Denied	Other	Percentage
Hispanic or Latino	523	210	161	59%
Not Hispanic or Latino	17	12	6	49%
Information not provided	8	12	12	25%
Not applicable	7	-	3	70%
<b>Total</b>	<b>555</b>	<b>234</b>	<b>182</b>	<b>57%</b>
Source: 2013 HMDA via the Shimberg Center for Housing Studies & Florida Housing Data Clearinghouse				

As identified in the Community Profile section earlier in this document, individuals of Hispanic ethnicity make up a significant portion of the City's population. The table above provides details on home purchase loan disposition for Hispanic and Non-Hispanic applicants in Hialeah. Hispanic applicants made up 92% of all applicants in 2013. OF which, 59% of those applications resulted in loan origination – in line with the City's overall rate of 57%.

While the reason for denial was not provided for 33% of all denials, a further examination of the denials, for those that did provided a primary reason, indicates that 50 (21% of) applicants were denied due to a lack of Collateral. This often indicates the purchaser is not providing a significant down payment and therefore there is not sufficient equity in the home to serve as collateral. Lack of Collateral was followed closely by Debt-to Income ratio as the second leading cause for denial of home

purchase loan applications. These issues were followed by Credit related denial reasons, including incomplete Credit application and poor Credit History. The table below provides details for denials of applicants for home purchase loans.

<b>TABLE: Home Purchase Loan Application Denial Reasons, 2013</b>		
Denial Reason	Applications Count	Percentage of all Denials
Debt-to-income ratio	44	19%
Employment history	2	0%
Credit history	19	8%
Collateral	50	21%
Insufficient cash (down payment, closing costs)	12	5%
Unverifiable information	9	4%
Credit application incomplete	21	9%
Other	26	11%
Not available	51	22%
Total	234	--
Source: 2013 HMDA via the Shimberg Center for Housing Studies & Florida Housing Data Clearinghouse		

The table below shows the number of applications for home purchase, which resulted in loan origination, by property type between 2005 and 2013. Please note, in some cases, the property type information was not provided which may cause totals to vary from previous tables. The number of single-family home purchase loan originations has increased steadily since a low of just 345 loans in 2009 to a total of 547 in 2013. However, the market is still only a fraction of what it was between 2005 and 2007 with a high of 5764 single-family purchase loans originated in 2006 – less than 10% of the volume in 2013 compared to 2006.

<b>TABLE: Loan Originations for Home Purchase Loans by Property Type, 2005-2013</b>									
	Application Count								
Property Type	2005	2006	2007	2008	2009	2010	2011	2012	2013
One to four-family (other than manufactured housing)	4787	5764	2080	445	345	406	419	448	547
Manufactured housing	1	12	9	4	-	-	1	-	-
Multifamily	15	12	15	6	3	3	4	11	8
Total	4799	5788	2104	455	348	409	424	459	555
Source: 2013 HMDA via the Shimberg Center for Housing Studies & Florida Housing Data Clearinghouse									

The next table identifies the number of home purchase loans originated by property type and by owner occupancy status. Nearly 92% of all loans origination for home purchase were for applicants who intended to make the home their primary residency. Only 45 loans were originated for non-owner occupants seeking to purchase a home.

<b>TABLE: Loan Originations Home Purchase Loans by Owner Occupancy and Property Type, 2013</b>		
Property Type	Owner-Occupied	Non-Owner-Occupied
One to four-family (other than manufactured housing)	505	42
Multifamily	-	3
Source: 2013 HMDA via the Shimberg Center for Housing Studies & Florida Housing Data Clearinghouse		

Not all loan applications, or originations, are for home purchase. Many borrowers are seeking to refinance an existing mortgage or make home improvements. In fact, nearly four times the number of home purchase loans were made for current owners seeking to refinance or 65% of all loan originations. The table below identifies the number of loans originated by property type and loan purpose. In 2013, a total of 1,737 mortgages were originated; 1146 for refinance, 555 for purchase and just 36 were for home improvement loans.

<b>TABLE: Loan Originations for Loans by Property Type and Purpose, 2013</b>			
Property Type	Home Purchase	Home Improvement	Refinance
One to four-family (other than manufactured housing)	547	32	1123
Multifamily	8	4	23
Total	555	36	1146
Source: 2013 HMDA via the Shimberg Center for Housing Studies & Florida Housing Data Clearinghouse			

The following table provides details on the loan amounts for home purchase loans origination in 2013. Forty-five percent (45%) of all home purchase loans for loans of less than \$150,000 each. Another 46% of home purchase loans were for loans valued between \$150,000 and \$250,000. There were eight loans originated for values of \$400,000 or above of those, seven were multi-family units including three valued over \$1,000,000.



**TABLE: Home Purchase Loan Amounts by Property Type 2013**

Loan Amount	Home Purchase			Percentage of all Loans
	Single Family	Manufactured Housing	Multifamily	
less than \$50,0000	7	-	-	1%
\$50,000 to \$74,999	57	-	-	10%
\$75,000 to \$99,999	54	-	-	9%
\$100,000 to \$124,999	62	-	-	11%
\$125,000 to \$149,999	77	-	-	14%
\$150,000 to \$174,999	84	-	-	15%
\$175,000 to \$199,999	83	-	-	15%
\$200,000 to \$249,999	90	-	-	16%
\$250,000 to \$299,999	17	-	-	3%
\$300,000 to \$399,999	15	-	1	3%
\$400,000 to \$499,999	-	-	2	0%
\$500,000 to \$599,999	-	-	2	0%
\$600,000 to \$699,999	1	-	-	0%
\$800,000 to \$899,999	-	-	-	0%
\$900,000 to \$999,999	-	-	-	0%
\$1,000,000 to \$4,999,999	-	-	2	0%
\$5,000,000 or more	-	-	1	0%
Total	547	0	8	

Source: 2013 HMDA via the Shimberg Center for Housing Studies &amp; The Florida Housing Data Clearinghouse

## High Cost Loans

Since the housing market decline began in 2009 with the collapse of what was then referred to as Sub-prime mortgages, lending institutions have been required to report on the difference in the interest rate charged to the borrower and the Treasury interest rate received by the lender itself – this is known as the “rate spread”. When the rate spread is significant, the mortgage is now considered a High Cost loan – rather than a Sub-prime loan. The Shimberg Center for Housing Studies identifies High-Cost loans as follows: "High-Cost" loans are those for which lenders must report the spread between the annual percentage rate (APR) on the loan and a benchmark for a typical prime rate loan. The High-Cost category is intended to flag loans that are likely to be subprime. Prior to October 1, 2009, for first lien loans, the threshold for reporting was 3 percentage points above the Treasury security; for junior lien loans, the threshold was 5 percentage points above the Treasury security. Starting October 1, 2009, the threshold was 1.5 percentage points above the average prime rate offer from Freddie Mac's Primary Mortgage Market Survey (PMMS) for first lien loans and 3.5 percentage points for junior lien loans.

High Costs loans are often made to borrowers who just meet the minimum loan eligibility criteria. Therefore, their marginal credit worthiness usually results in a higher mortgage interest rate. These borrowers are often First Time Homebuyers with very little money for a down-payment and little cash for closing expenses. These High Cost loans are often required to also carry Primary Mortgage Insurance or PMI. Lenders including the FHA usually require PMI when the loan amount exceeds 80% of the value of the home. PMI is typically paid as an additional monthly payment along with the principle, interest, taxes and property insurance. The additional burden of PMI can result in an increased cost burden for the homeowner and it can take years of steady payments before the PMI requirement is waived.

The following series of tables provides details on High Cost loan activity in Hialeah for 2013. Of the 555 home purchase loans originated 104 of them were considered High Cost loans. All of the High Cost loans were made for single-family home purchases.

<b>TABLE: High-Cost Home Purchase Loans by Property Type, 2013</b>		
Property Type	Home Purchase	
	High-Cost	Non-High-Cost or Unknown
One to four-family (other than manufactured housing)	104	443
Multifamily	0	8
Source: 2013 HMDA via the Shimberg Center for Housing Studies & Florida Housing Data Clearinghouse		

The percentage of all purchase loans originated that were High Cost loans has been on the rise since 2010, increasing from just 7% of all purchase loans in 2010 to 20% in 2013.

<b>TABLE: High-Cost Loans as a Percentage of All Loans for Owner Occupied Home Purchase Loans, 2010-2013</b>			
2010	2011	2012	2013
7%	6%	9%	20%
Source: 2013 HMDA via the Shimberg Center for Housing Studies & Florida Housing Data Clearinghouse			

Fifty-eight percent of all High Costs loans were for loan amounts between \$100,000 and \$200,000, which is a typical price point for First Time Homebuyers. Another 30 High Cost loans were valued between \$200,000 and \$400,000.

<b>TABLE: High-Cost, Owner Occupied Home Purchase Loans by Loan Amount, 2013</b>		
Loan Amount	High-Cost	Non-High Cost or Unknown
less than \$50,000	1	4
\$50,000 to \$74,999	8	42
\$75,000 to \$99,999	3	41
\$100,000 to \$124,999	9	46
\$125,000 to \$149,999	11	60
\$150,000 to \$174,999	17	63
\$175,000 to \$199,999	22	56
\$200,000 to \$249,999	19	71
\$250,000 to \$299,999	4	13
\$300,000 to \$399,999	7	8
Source: 2013 HMDA via the Shimberg Center for Housing Studies & Florida Housing Data Clearinghouse		

All of the 101 high cost loans were for White applicants and all but one of those applicants was also Hispanic.

<b>TABLE: High-Cost, Owner-Occupied Home Purchase Loans by Race, 2013</b>		
Race	High-Cost	Non-High Cost or Unknown
Asian	-	1
Black or African American	-	7
Native Hawaiian or Other Pacific Islander	-	1
White	101	386
Information not provided	-	9
Source: 2013 HMDA via the Shimberg Center for Housing Studies & Florida Housing Data Clearinghouse		

<b>TABLE: High-Cost, Owner Occupied Home Purchase Loans by Hispanic/Latino Ethnicity, 2013</b>		
Ethnicity	High-Cost	Non-High Cost or Unknown
Hispanic or Latino	100	384
Not Hispanic or Latino	1	12
Information not provided	-	8
Source: 2013 HMDA via the Shimberg Center for Housing Studies & Florida Housing Data Clearinghouse		



## Community Reinvestment Act

Since the passage of the Community Reinvestment Act (CRA) in 1977, banks have been strongly encouraged to serve the credit needs of all persons within the community, including those with low and moderate incomes. The CRA establishes a regulatory mechanism for monitoring the level of lending, investments and services in low and moderate-income neighborhoods that have traditionally been underserved by lending institutions. While most mortgage companies, finance companies, and credit unions are required by HMDA to provide information on their lending activities, many are exempt from CRA coverage and its examination process. Because only federally-insured financial institutions are covered by CRA, mortgage companies, finance companies and credit unions are all exempt from CRA regulations. Commonly, it is considered that only depository financial institutions are covered by CRA.

Four Federal Financial Institutions Examination Council (FFIEC) agencies conduct CRA examinations and enforcement – the Board of Governors of the Federal Reserve System, the Federal Deposit Insurance Corporation (FDIC), the Office of the Comptroller of the Currency (OCC), and the Office of Thrift Supervision (OTS). Examiners from the four FFIEC agencies assess and “grade” lenders’ activities in low and moderate-income neighborhoods. Large institutions are graded on how well they meet their CRA obligation according to a three-part test that evaluates actual performance in lending, investing, and providing banking services to the entire community including low and moderate income (LMI) borrowers and borrowers (individuals or businesses) located in LMI areas. Smaller institutions are subject to a more streamlined examination that focuses on lending.

Lending institutions receive one of four ratings or grades after a CRA exam. The top two ratings of “Outstanding” or “Satisfactory” mean that a federal examiner has determined that a lender has met its obligation to satisfy the credit needs of communities in which it is chartered. The two lowest ratings, “Needs to Improve” or “Substantial Noncompliance,” reflect a failure on the part of the lending institution to meet the credit needs of communities, particularly the low and moderate income communities, in which it is chartered. The four federal agencies examine large banks approximately once every two years. However, large lending institutions, with Satisfactory ratings, may be examined once every four years and institutions with Outstanding ratings may be examined once every five years.

While poor CRA ratings do not result in immediate sanctions for a lender, receipt of a low CRA rating can curtail an institution’s future plans for service changes or mergers with other financial institutions. When a lender plans to merge with another institution or open a new branch, they must apply to the Federal Reserve Board and/or to its primary regulator for permission. Receipt of one of the two lowest

CRA ratings is considered in the review of the application by the federal agency. The reviewing federal agency has the authority to delay, deny, or add conditions to an application.

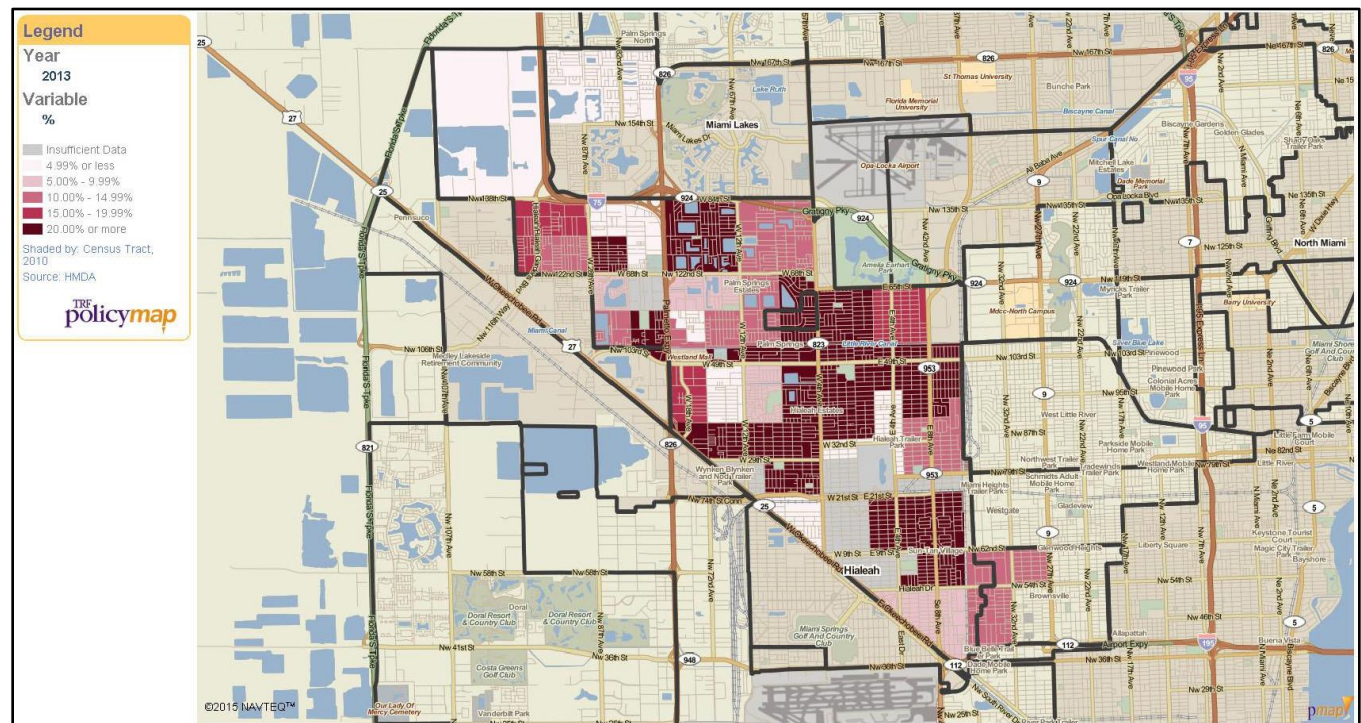
A review of the CRA ratings for the lenders within the City of Hialeah reveals that all of the depository financial institutions in Hialeah, reviewed, since 1993, received ratings a rating of Satisfactory in their most recent review. However, no institutions, located in Hialeah, have been reviewed since 1997. That may simply indicate there are no local financial institutions based in Hialeah. Upon investigation of all reviewed lending institutions across the state of Florida, since 2010 there have been only three institutions that received a rating of Needs to Improve and no institutions have received a Substantial Noncompliance rating. Details of these institutions are provided in the table below.

TABLE: Lenders' CRA Ratings			
Bank	Location	CRA Rating	Rating Period
Bank of the South	Pensacola	Needs to Improve	2010, 2012, 2014
First Navy Bank	Pensacola	Needs to Improve	2011 & 2014
Bank Atlantic	Ft. Lauderdale	Needs to Improve	2010

Source: FFIEC CRA Rating Database June 2015

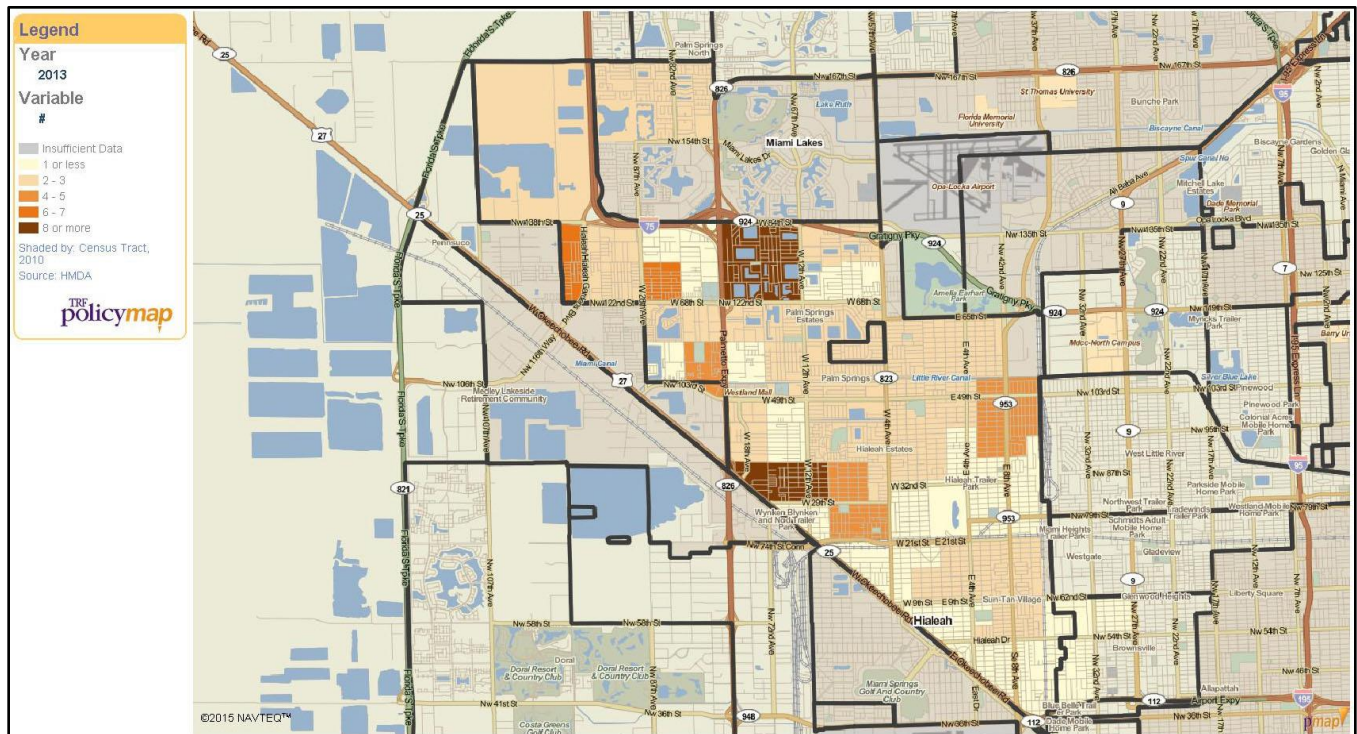
The map below identifies areas of concentration for high-cost loans, formerly called Sub-prime loans.

**MAP: High Cost Loans – Percentage**



The lightest red shaded areas in the map above show where the percentage of high cost loans is 4.99% or less, and light red shaded areas show where the percentage of high cost loans is 5.00% and 9.99%. The medium red shaded areas show where the percentage of high cost loans is between 10.00% and 14.99%. The darker red shaded areas show where the percentage of high cost loans is between 15.00% and 19.99% and the darkest red shaded areas show where the percentage of high cost loans is over 20.00% or more in the city.

### MAP: High Cost Loans – Number

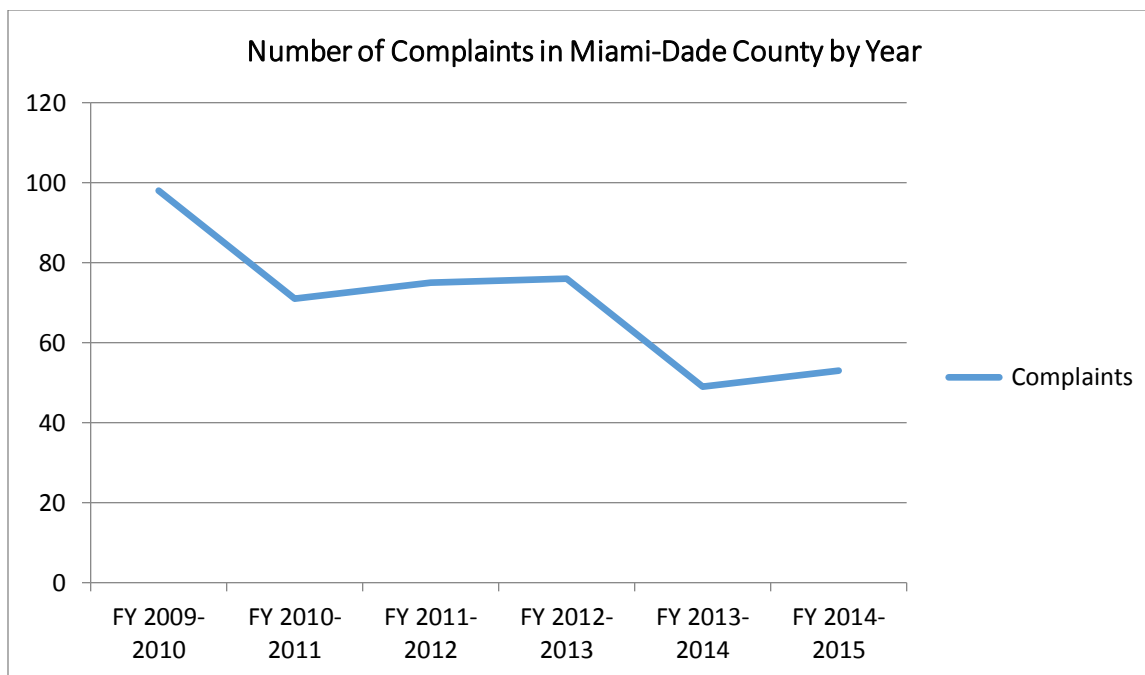


The lightest yellow shaded areas in the map above show where the number of high cost loans is 1 or less, and light yellow shaded areas show where the number of high cost loans is 2 and 3. The medium yellow shaded areas show where the number of high cost loans is 4 and 5. The darker yellow shaded areas show where the number of high cost loans is 6 and 7 and the darkest yellow shaded areas show where high cost loans are over 8 or more in the city.

## Fair Housing Complaints

To register a complaint with the Florida Commission on Human Relations (FCHR), the aggrieved party must officially file the complaint within 1 year of the date of the alleged discrimination. The Commission investigates the complaint and notifies the applicant of the validity of the complaint. If a violation has occurred, a formal complaint form is completed. During this process, every effort is made to mediate and resolve the problem. Once the commission reaches a decision, the complainant will receive instructions on how to seek remedies under the law. Remedies for housing discrimination include injunctions, restraining orders, damages, court costs, and attorney fees. In Florida, US Department of Housing and Urban Development also directly receives and investigates Fair Housing complaints from persons who believe that they have been discriminated against based on race, color, national origin, sex, family status or disability when trying to buy or rent a home or apartment.

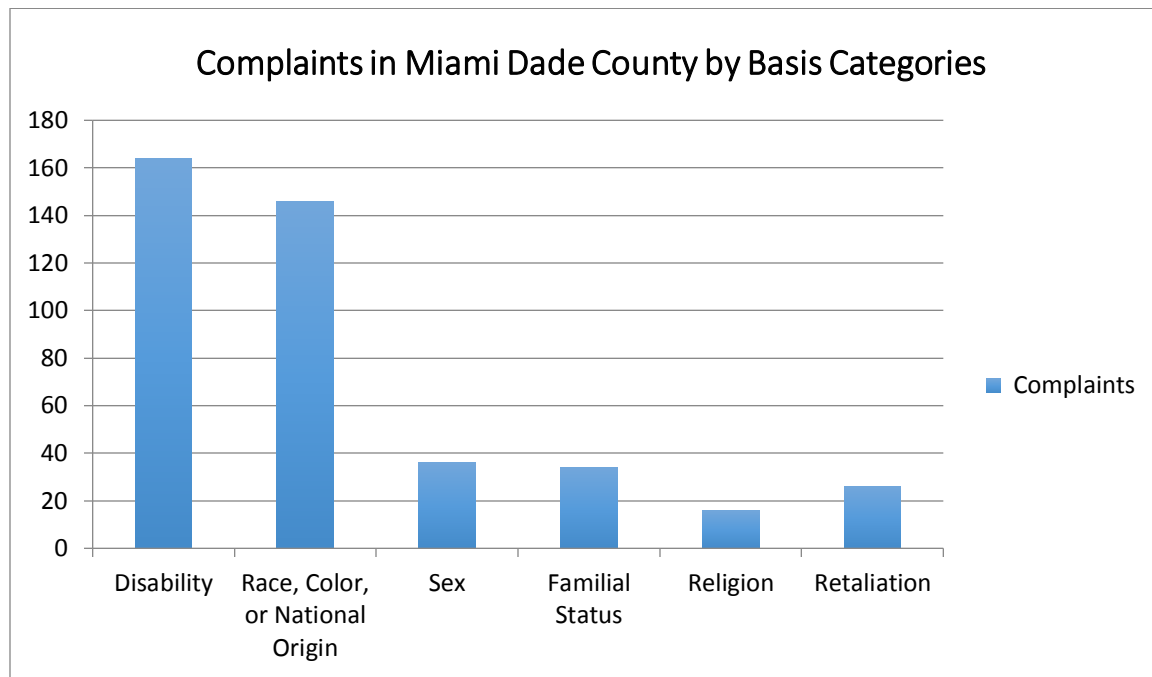
The following details about Fair Housing complaints are for the entirety of Miami-Dade County, and not just Hialeah, but County trends still provide insight into patterns at the city level. According to the FCHR, a total of 422 complaints were filed in the county during the past 5 years. The highest amount of complaints came in the 2009-2010 Fiscal Year at 98 complaints, and the second most during the 2012-2013 FY with 76 complaints.



Data Source: Florida Commission on Human Relations



In this period FCHR reported 164 complaints were filed because of disability (39%), 146 complaints were filed because of color, race or national origin (35%), and 36 complaints were filed because of sex (9%). 34 complaints were filed because of familial status (8%) and 16 complaints were filed because of religion. Twenty-six complaints filed listed retaliation.



Data Source: Florida Commission on Human Resources

Twenty-nine (29) of the complaints filed during the 5-year period, while 164 were determined no cause. 108 of the complaints were settled through Administrative Closure. No information or reason was provided for 121 of the complaints filed with FCHR in Miami-Dade County.

The City of Hialeah states that it did not receive any fair housing complaints from the period covered by the last AI. To identify Fair Housing Complaints that were not filed directly with the City of Hialeah in the last five years since the last AI, information on complaints filed was requested from the following organizations.

Organization	Response
HOPE Inc.	Information would not be available for 90 days from date of request
Florida Justice Institute	Provided copy of lawsuit 09-22087 filed on July 2010 against the Hialeah Housing Authority
Miami HUD Office Fair Housing Section	Mailbox full
Legal Services of Greater Miami	Referred to HOPE, Inc.
Miami Dade county Public Housing and Community Development	Referred to HOPE Inc. or Office of Human Rights and Fair Employment Practices
Office of Human Rights and Fair Employment Practices	Referred to Fair Housing Agency

A study by HUD’s Office of Policy Development and Research, “Housing Discrimination Against Racial and Ethnic Minorities 2012”, provides further insight into potential fair housing violations in Hialeah’s rental market. In the Miami metropolitan area, which includes Hialeah, the report found:

“There are no significant differences in unit availability and inspections for white and Hispanic home seekers in Miami, though whites see .15 more problems in inspected units, on average, than Hispanics, and are also more likely to see more problems than their Hispanic partner and less likely to see at least one home without any problems. Most financial indicators favor neither Hispanic nor white testers, though agents are more likely to offer whites a two-year lease and tell whites that payments required at move-in and security deposits or surety bonds are negotiable. Agents are also more likely to tell Hispanics than whites that a background check must be completed, and provide Hispanics with informational materials. At the same time, whites are likely to hear comments on their rent history and remarks about race or ethnicity than Hispanics, and rental agents are more helpful to whites, on average, than to Hispanics.”

## Fair Housing Lawsuits Filed

On July 2010, a Fair Housing lawsuit case No. 09-22087 was filed in the United States District Court, Southern District of Florida Miami-Dade Division against the Hialeah Housing Authority by 6 plaintiffs claiming illegal discrimination and unlawful hearing denials.

The case was filed on the following counts:

4. Violation of the United States Housing Act
5. Violation of Procedural Due Process (failure to follow verification procedures)
6. Violation of Substantive Due Process
7. Violation of the Fair Housing Act
8. Violation of Section 504 of the Fair Rehabilitation Act
9. Violation of the American with Disabilities Act
10. Violation of Procedural Due Process (failure to provide fair hearings)

### Outcome

The Hialeah Housing Authority agreed to be bound by a Consent Decree, which requires HHA to follow new procedures for verifying applicant information and conducting administrative hearings. The Consent Decree also ensures that HHA will follow appropriate procedures for disabled applicants. These changes will make a huge systemic impact on how the HHA processes applications by ensuring for a fairer process for all applicants. Also, HHA agreed to pay \$254,000, which covers damages as well as attorney fees and costs.

HUD's annual report on Fair Housing covering the period from 2012-2013 stated that on August 9 2010, the United States Court of Appeals for the Eleventh Circuit United States of America filed case No. 10-12838 against the Hialeah Authority. This case was related to reasonable accommodation by a tenant residing in a public housing unit. Below is the outcome of this case:

Name	FY	Outcome	Compensatory Damages	Civil Penalty	Victims' Fund	Other
United States V. Hialeah Housing Authority	12	Consent Decree or Settlement	\$20,000	\$0	\$0	\$0

## Effect of Land Use Planning Policies and Regulations on Fair Housing Choice in Hialeah

Hialeah has a prevalence of multifamily developments, and its Comprehensive Plan, zoning regulations, and Land Development Code contain several provisions to promote or facilitate affordable housing development. Hialeah likely goes above and beyond many suburban communities in facilitating affordable and higher density development, and it avoids such exclusionary land use requirements as large minimum lot sizes. However, some provisions governing land use in Hialeah could be modified to more effectively expand the affordable housing supply.

### Comprehensive Plan – Housing Element and Future Land Use Element

Hialeah's Comprehensive Plan covers the time period from 2003 to 2015. When the plan was drafted, single-family units (detached and attached) comprised slightly over half of the City's housing stock, a trend also found in 2013 5-year American Community Survey (ACS) data. The Housing Element reported that nearly 80% of residential units for which permits were issued between 1996 and 2002 were in multifamily developments. Additionally, the Future Land Use Element stated that most developable residential land was suitable for multifamily rather than single-family housing. Overall, the Future Land Use Element suggested that the current and future supply of higher density and multifamily housing was ample.

However, the Housing Element provided a contrasting picture, with over three-quarters of vacant residential land slated for low-density development (see Table below). Moreover, the Future Land Use Element projected that the amount of improved and vacant residential land (outside the Mixed-Use and Downtown Mixed-Use Districts) would drop from 7,909 acres to 7,801 acres, due primarily to conversions of medium- and high-density residential development to other uses. The Housing Element estimated that 15,439 new units could be developed on vacant residential land (see Table below), which was about 3,000 units short of the additional units needed to house the City's increased population by 2015.



District Type	Future Land Use Categories	Vacant Acreage	Potential Additional Units
Residential	Low Density	1,077	8,616
	Medium Density	36	576
	High Density	45	1,152
Downtown Mixed	Low Density	10	78
	Medium Density	66	1,059
	High Density	97	3,088
Mixed Use		68	870
Source: The Housing Element			

Since the Comprehensive Plan was published, the gap that it projected between future housing supply and demand has likely had a disproportionate impact on lower income and elderly populations. The Housing Element's population projections showed that the increase in very low-income households between 2002 and 2015 would be moderately greater than the increase in households at higher income brackets (see Table A below). The difference was more pronounced for renters than for owners (data not shown). Between 2000 and 2015, the number of residents aged 75 and over was projected to grow much faster than the number of residents under age 45 (Table B). Among elderly-headed households (65 and older), the increase in severely cost-burdened renters (paying over 50% of income for housing) is slightly higher than the increase in renters with lower levels of cost burden (Table C).

A. Income Range (% of AMI)	Projected % Change 2002 - 2015	B. Age Range	Projected % Change 2000 - 2015	C. Housing Costs as % of Income (Elderly-Headed Households)	Projected % Change 2002 - 2015 (Owners)	Projected % Change 2002 - 2015 (Renters)
<20%	22%	Under 15	10%	<30%	32%	36%
20-29%	28%	15-24	18%	30-39%	32%	38%
30-39%	24%	25-34	-5%	40-49%	33%	38%
40-49%	22%	35-44	-9%	50+%	33%	41%
50-59%	22%	45-54	56%			
60-79%	21%	55-64	53%			
80-119%	20%	65-74	16%			
120+%	22%	75+	64%			

To address these future needs among lower income and elderly-headed households, the Housing Element recommended that the City promote housing cooperatives, affordable housing development in mixed-use areas, and secondary or accessory dwelling units on single-family properties for elderly relatives of the homeowners. Taken together, the Housing Element and Future Land Use Element referenced additional incentives for affordable housing and high-density development, including

impact fee subsidies. (The most current incentives will be considered in the Land Development Code and Zoning Code sections).

However, the Plan did not estimate the extent to which these measures would close the projected 3,000-unit gap between housing demand and supply. The City could ratchet up the amount of residential land zoned (or expected to be zoned) for medium or high density, as well as expanding the conditions under which Accessory Dwelling Units (ADUs) are permitted (see discussion below).

## Land Development Code

Hialeah's current Land Development Code provides for expedited permitting of affordable housing developments. A representative from the Grants Administration department conducts an initial review and serves as an expeditor for the proposed project, guiding the developer through the permitting process and helping them to address any unanticipated roadblocks. The Land Development Code also contains several elements from the Affordable Housing Incentive Plan passed in 1995. These include exemption of affordable housing developments from interim proprietary and general services fees, and allowances for offsite parking for multifamily developments, particularly in Commercial-Residential and Central Business Districts. See p. 80 for more details.

## Zoning Code

Hialeah's Zoning Code has a wide range of districts where residential uses are permitted, including single-family, townhomes, and multifamily developments of various sizes. Mobile homes are not explicitly prohibited in any residential district, and the Housing Element of the Comprehensive Plan stated that mobile homes should be allowed in areas with adequate infrastructure, comparable density in neighboring areas, and nearby commercial activity and amenities. Maximum residential densities range from 5 units per net acre in one-family zoning districts (R-1) to 32 units per net acre in certain multifamily zoning districts (R-3-5, R-3-D, NBD, CR). Higher densities are allowed in certain zoning districts as an incentive for certain desirable development features:

- Neighborhood Business District (NBD) – With height and density incentives, the residential density can be as high as 70 units per net acre. Proposed developments are awarded points toward height or density increases if they incorporate certain desirable features, such as affordable housing, bus shelters, or architectural accents. The development feature with the highest number of points for increased height is the designation of at least 20% of units as affordable housing. However, several density incentive features, including improved signage, are worth more points.
- Multifamily Downtown (R-3-D) and Commercial-Residential (CR) zoned areas in the Hialeah Downtown Urban Center (HDUC) district – Residential developments may have a density of up to 40 units per net acre if the developer provides public open space in the HDUC district.

In the R-1 zoning district, single-family properties may have second living quarters under certain circumstances:

- Elderly homeowners (55 and older) may rent out a second living quarters to generate an income stream. The second living quarters may be contiguous to the main residence or detached.
- Any single-family property in an R-1 district may have second living quarters for immediate family, including parents, grandparents, children and their families, and grandchildren and their families. The second living quarters may not be detached unless it is located in a permitted guesthouse.

Currently, most of Hialeah's developable land is in the Hialeah Heights district north of NW 138th street. The lowest-density residential zoning district in Hialeah Heights (RH-1) has smaller minimum lot sizes for new development compared to the R-1 district (3,000 square feet vs. 7,500 sqft), but does not permit secondary living quarters. It is not clear what percentage of residential land in Hialeah Heights will be devoted to RH-1 zoning. Hialeah's current zoning map (available on the City website in a web-based GIS application) does not designate individual zoning districts in Hialeah Heights. The Future Land Use Map (FLUM) in the Comprehensive Plan designates most of Hialeah Heights in a color that is

not included in the legend. However, the FLUM designates the eastern portion of Hialeah Heights as a mixture of low- and medium-density residential.

Overall, Hialeah's Zoning Code contains several good-faith measures to promote affordable and multifamily housing. However, as a relatively low-income community with a growing population and low vacancy rates, Hialeah may wish to expand zoning tools for promoting affordable housing. If more homeowners in R-1 districts were allowed to rent secondary living quarters or ADUs to unrelated tenants, the supply of affordable housing in desirable neighborhoods could be significantly expanded, depending on the level of interest among homeowners in becoming landlords. Secondary living quarters and ADUs could also be permitted in Hialeah Heights. Additionally, affordable housing and density incentives could be expanded beyond the NBD and HDUC zones, and the relative weight of affordable housing height incentives in NBD zones could be increased.

The strongest regulatory tool to promote affordable housing development—at least in recently annexed territory that is not yet developed—would be to require inclusionary housing rather than simply encouraging it. In new developments or residential rehabilitation projects over a certain size—mainly in the undeveloped annexed areas—developers would be required to offer a certain percentage of units at prices affordable to low-income homebuyers or renters. This tool is not very effective during market slowdowns, as seen during the Recession, but it can contribute a significant number of affordable units as housing development accelerates.



## Equal Opportunity/Affirmative Fair Housing Marketing Procedures for the HOME program

The City of Hialeah has adopted Equal Opportunity/Affirmative Fair Housing Marketing Procedures under the HOME program that include a definition of affirmative marketing, regulation goals, special outreach efforts, compliance reports, non-compliance procedures, and minority/women owned business outreach.

### Review Recommendations:

1. The policy should be dated to ensure that it is updated when the regulations, programs and policy changes are created or updated.
2. The document should include all housing programs, not just HOME.
3. The document references the old HOME rule where affirmative fair housing marketing policies applied to rental project with 5 units or more. The new HOME rule makes the affirmative fair housing requirements applicable to all housing projects.
4. Adopt new HOME program policies and procedures that incorporate the requirements of the new HOME rule.
5. Include requirements under purchase assistance programs and TBRA if applicable.
6. Update outreach procedures for the City, subrecipients and non-profits to include websites, Facebook and other social media.

## Affirmative Fair Housing Marketing Plan

This document provides policies and procedures for the administration of the City of Hialeah's affordable housing inventory, in partnership with the Hialeah Housing Authority.

### Review Recommendations:

1. Provide an effective date for this policy to allow for updates when there is change to laws or acts that impact this policy.
2. Include a provision that any changes in laws or policies required by law will be incorporated by reference.
3. Update document to incorporate recent laws including changes to federal, state and local law.
4. Update document to include additional units developed and owned by the City of Hialeah.
5. Sexual orientation is not listed under marketing and tenant selection but is listed under Chapter 1 section C, Fair Housing Policy.
6. Include outreach and advertising of available units through social media, including the City and Housing Authority websites and Facebook pages, in addition to newspapers.
7. Provide for reasonable accommodation for applicants with disabilities that cannot apply through the standard process.
8. State provisions for reasonable accommodation in accordance with Section 504.
9. Review pet policy to allow for service animals for people with disabilities.
10. Provide a monitoring schedule or timeline.
11. Clearly state responsibilities of the City and the HHA.
12. Adopt or incorporate by reference the HHA reasonable accommodation policy for City of Hialeah owned properties.

## Local Housing Assistance Plan

In accordance with the State Housing Initiatives Partnership Program (SHIP) rule at 67-37 and the SHIP statute 420.907, the City of Hialeah has adopted a three year Local Housing Assistance Plan (LHAP). The LHAP provides strategies for housing assistance to serve very low and low-income households. The plan includes provisions against discrimination in the administration of the housing programs. The plan includes a definition of affordable housing and provisions for workforce housing, energy efficiency improvements, and deferred payment loans in the rehabilitation of existing residential housing, reconstruction of existing housing and purchase assistance.

### Recommendations:

1. The City will develop a new three-year plan in 2016 and incorporate any new requirements and provisions into the new LHAP.
2. Review the new Consolidation Plan to adapt new program strategies based on needs assessment.
3. Support and encourage full funding of the SHIP program.

## Reasonable Accommodation Policy and Procedures

On January 29, 2013, the HHA adopted a reasonable accommodation policy. The purpose of this policy was to ensure that its “policies and procedures do not deny individuals with disabilities the opportunity to participate in, or benefit from, nor otherwise discriminate [sic] against individuals with disabilities, on the basis of disability, in connection with the operations of HHA's programs, services and activities. Therefore, if an individual with a disability requires an accommodation such as an accessible feature or modification to a HHA policy, HHA will provide such accommodation unless doing so would result in a fundamental alteration in the nature of the program; or an undue financial and administrative burden. In such a case, the HHA will make another accommodation that would not result in a financial or administrative burden.”

The adoption of this policy serves to reduce the incidence of discrimination against those that have a disability. The HHA has also created a Section 504 coordinator position who is responsible for monitoring HHA compliance with this policy. The Section 504 coordinator will attend training to ensure that this policy complies with all applicable federal, State and local laws.

The adopted reasonable accommodation policy applies to all individuals with disabilities that apply for public housing, are existing residents of public housing, participate in the Housing Choice Voucher or Moderate Rehabilitation Program, or participate in other programs or activities conducted or sponsored by HHA.



## Public Housing Admission and Continued Occupancy Policy

On May 29, 2012, the Hialeah Housing Authority adopted a Public Housing Admission and Continued Occupancy Policy Statement of Policies and Objectives.

This policy lays out the functions and responsibilities of the HHA staff in compliance with the HHA Personnel Policy and HHA's Admissions and Continued Occupancy Policy. The intention is to ensure that the administration of the HHA's housing program meets the requirements of the Department of Housing and Urban Development. Such requirements include any Public Housing Regulations, Handbooks, and applicable Notices. All applicable Federal, State and local laws, including Fair Housing laws and regulations also apply.

This document reinforces the HHA policy to fully comply with Title VI of the Civil Rights Act of 1964, Title VIII and Section 3 of the Civil Rights Act of 1968 (as amended), Executive Order 11063, Section 504 of the Rehabilitation Act of 1973, the Age Discrimination Act of 1975, state and local Fair Housing laws, and any legislation protecting the individual rights of residents, applicants or staff which may be subsequently enacted.

Under this policy the HHA will comply with all laws and court orders relating to civil rights, including but not limited to:

- Title VI of the Civil Rights Act of 1964 (42 U.S.C. §2000d et seq.) and 24 CFR Part 1
- Title VIII of the Civil Rights Act of 1968 (as amended by the Community Development Act of 1974 and the Fair Housing Amendments Act of 1988
- Fair Housing Act (42 U.S.C. §§3601-3631) and 24 CFR Parts 100, 108, and 110
- Executive Order 11063 on equal opportunity in housing and 24 CFR Part 107
- Executive Order 13166 on improving access to services for persons with limited English proficiency
- Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. §794) and 24 CFR Part 8
- Age Discrimination Act of 1975 (42 U.S.C. §§6101-6107) and 24 CFR Part 146
- Title II of the Americans with Disabilities Act (42 U.S.C. §§12131-12134), 28 CFR 35
- Any applicable state and local laws and ordinances and any legislation protecting individual rights of tenants, applicants, or staff that may subsequently be enacted

## 2010-2014 Analysis of Impediments: Findings, Recommendations and Actions

The Analysis of Impediments conducted in 2010 identified the following impediments to Fair Housing Choice:

1. Violations of federal, state, and local fair housing laws in the jurisdiction and immediate surrounding areas.
2. Lack of awareness of fair housing laws, issues, and resources.
3. Racial disparities in fair and equal lending.
4. Although the City exceeded the City of Miami and Miami-Dade County development of affordable housing over the last several years, creation of affordable housing is limited to the maximization of federal, state, and local funds.

The Goals and accomplishment were as follows:

### Goal 1. Reduce the Incidence of Housing Discrimination

Actions taken:

- Included fair housing and equal opportunity requirements in all agreements with non-profit developers, contractors and subrecipients providing services under entitlement programs
- Monitored subrecipients and non-profits to ensure compliance with fair housing requirements
- Included fair housing and equal opportunity requirements in the rental of all City owned rental housing projects
- Staff attended fair housing training and workshops provided by HUD and local fair housing offices to keep up to date on fair housing practices and program requirements
- Mayor and City Council each year proclaimed April to be Fair Housing Month

### Goal 2. Educate the Community about its Fair Housing Rights and Responsibilities

Actions taken:

- Included the equal opportunity logo in all advertising for programs and services provided by the Department of Grants and Human Services

- Posted Fair Housing posters in City Hall, City housing offices, and offices of federal funding recipients (e.g. non-profit services providers, subrecipients and developers)
- Posted proclamation of Fair Housing Month in housing office
- Posted fair housing facts page on City of Hialeah's website

### Goal 3. Reduce Discriminatory and Abusive Practices in Lending

Actions taken:

- Educated program participants on predatory lending practices
- All loans used in combination with City funds were provided by non-predatory lenders

### Goal 4. Continue to Provide More Affordable Housing

Actions taken:

- Provided housing assistance to very low and low-income applicants for the rehabilitation of owner occupied housing.
- Developed affordable rental units for very low and low-income residents.
- Provided funding to non-profit developers to develop housing for persons with disabilities.
- Reconstructed of dilapidated housing, incorporating accessibility features in the finished units.
- Reviewed and continued to enforce the affordable housing incentives adopted by an affordable housing advisory committee in 1995. The following incentives are referenced in the most current Local Housing Incentive Plan.
  - *Incentive 1. Expedited Permitting*  
Permits are expedited to a greater degree than other projects.
  - Established policy and procedures: Appointment of an affordable housing expediter.
  - The City provides a form, with a priority number assigned, to identify and certify the affordable housing status of an application for a development order. In order to certify the application as involving affordable housing, a representative from the Dept. of Grants and Human Services will initially review the project to determine whether it meets affordability criteria and contact the Planning and Development Department. The same representative will act as an affordable housing expediter charged with the responsibility of ensuring a consistent, expedited review of the project. In addition, the same staff person will act as an advocate and access person for developers of affordable housing projects if they encounter unexplained delays or problems.

- Permitting process: Pre-application site inspection for renovation: Planning and Development Department shall conduct pre-application site inspections for applications for building permit for renovations, including interior changes, roof and facade alterations but excluding renovations involving structural repairs.
  
- *Incentive 2. Ongoing Review Process*
  - An ongoing process for review of local policies, ordinances, regulations and plan provisions that increase the cost of housing prior to their adoption.
  - Established policy and procedures: On applications for development orders, proposed policies, procedures, ordinances regulations, or plan provisions that increase the cost of housing that are reviewed by the Growth Management Advisory Committee (GMAC), written comments will be solicited and received from the Dept. of Grants and Human Services regarding the impact on affordable housing with respect to the application under review and consideration. The Dept. of Grants and Humans Services will in return submit its impact statement to the committee for consideration. This incentive is functioning as intended.
  
- *Incentive 3. Impact Fee Exemptions.*
  - Exemption from payment of Park, Recreation and Open Space Impact Fees for affordable housing properties developed and owned by the City of Hialeah. See HIALEAH, FLA., CODE § 32-230(5). Notice is provided to the Planning and Development Department stating that the Dept. of Grants and Human Services deems the project eligible for exemption. This incentive is functioning as intended.
  
- *Incentive 4. Expansion of Expedited Administrative Variance Procedure.*
  - The Administrative Variance Committee has the authority to review limited nonuse variances which have no relation to change of use of property and when relating only to matters concerning setback requirements, landscaping requirements, sign regulations, floor area requirements, yard requirements, lot coverage, open space requirements, height, width and length limitations for structures of buildings and spacing requirements between principal and accessory buildings. The review of the Administrative Variance Committee is limited to variance requests. Qualified developed individual lots except that the Committee may review requested variances of undeveloped individual lots intended for development of affordable housing: See HIALEAH, FLA., CODE § 32-5.5(c). This incentive is functioning as intended.

- *Incentive 5. Revision of Parking Requirements for Downtown Development.*
- Required off-street parking areas are generally required to be located on the same lot, parcel or premises as the use to be served. However, in Commercial-Residential (CR) zoning districts, the maximum distance limitation for off-street parking was extended to a 600-foot radius of the main entrance of the mixed commercial-residential use served. In Central Business District (CBD) zoning districts, the maximum distance limitation was extended to a 900-foot of the main entrance of the mixed commercial-residential use served. This incentive is functioning as intended.
- *Incentive 6. Expanded Criteria/or Granting Adjustments, Variances and Special Use Permits.*
- Expanded criteria for granting adjustments, variances and special use permits. Zoning variances, adjustments and special use permits are judged by the same criteria that includes a determination based on whether the development is in harmony with the general purpose and intent of the zoning code and the Hialeah, Fla., Land Development Code and consistent with the Hialeah, Fla., Comprehensive Plan and whether the development will provide substantial justice, not be contrary to the public interest and adversely affect the use and development of neighboring properties. This incentive is functioning as intended.



## Conclusion: Findings and Recommendations

### Fair Housing Related Impediments

Finding 1: Lack of awareness by residents of fair housing laws and where to file complaints.

Survey responses received by residents revealed a lack of awareness of fair housing laws related to the Fair Housing Act. Over 34% of respondents did not know where to file a complaint on fair housing. 50% of respondents do not know if fair housing laws were being adequately enforced throughout the City.

Finding 2: Lack of adequate data to determine fair housing violations and complaints within the City.

Several agencies were contacted to document fair housing complaints being filed with US HUD and local agencies. It was determined that Hialeah lacks an accessible, comprehensive system for tracking and recording complaints, which the local government requires to assess local needs and progress toward fair housing goals.

Finding 3: Outdated City policies on affirmatively furthering fair housing choice.

A review of local City policies related to affirmative marketing and fair housing choice show that documents have not been updated to comply with the most current state, federal and local laws.

Finding 4: Lack of awareness by stakeholders and the public about the new adopted Miami-Dade County Anti-Discrimination Ordinance that expands the protected classes by prohibiting discrimination based on status as a victim of domestic violence, dating violence or stalking; including source of income as a protected classification in housing; and prohibiting discrimination in housing, public accommodations, and employment based on gender identity or gender expression.

This new ordinance is in effect, but has not been incorporated into current program policies and procedures. City staff and subrecipients must become familiar with the requirements of the ordinances, and adopt the requirements in the implementation of current programs.

### Affordable Housing Related Impediments

Finding 5: Insufficient supply of affordable rental housing.

Based on available data there is an insufficient supply of affordable rental housing to address the needs of very low and low-income residents. The cost of land and development, low vacancy rates, and low paying jobs have an impact on the available supply of affordable rental housing.

Finding 6: Insufficient supply of affordable housing for purchase by low and moderate income families.

Based on the data available, homes for sale—including condominiums and townhomes—are not affordable to very low and low income families. Taxes and insurance increase the cost of monthly payments, reducing the affordability of single-family homes.

## Fair Housing Action Plan

Impediment	Recommended Actions	Timeline	Outcomes
1. Lack of awareness by residents of fair housing laws and where to file complaints	<ol style="list-style-type: none"> <li>1. Continue to provide the HUD fair housing brochure to all City program participants in their native language.</li> <li>2. Continue to support local organizations like HOPE, Inc. in educating the public on fair laws through workshops, training, public events, public service announcements and testing.</li> <li>3. Require all developers and subrecipients to distribute the HUD fair housing brochure to all tenants and program participants.</li> <li>4. Place fair housing posters in the Grants and Human Services Office.</li> <li>5. Require that all developers and subrecipients place a fair housing poster in all of the application office and lobbies.</li> <li>6. Place flyers and fair housing information in libraries, parks and recreation offices, community centers and public facilities.</li> <li>7. Continue to provide links on City website on fair housing information and resources in English and Spanish.</li> <li>8. Continue to monitor developers' and subrecipients' compliance with fair housing laws.</li> <li>9. Continue to incorporate fair housing requirements in all subrecipient and developer agreements.</li> <li>10. Educate Grants and Human Services staff on fair housing laws and compliance.</li> <li>11. Declare April Fair Housing Month and present Proclamation by Mayor and City Council at public meeting.</li> <li>12. Continue to have Grants and Human Services staff attend training and workshops on fair housing.</li> <li>13. Include the fair housing logo on all housing program related documents, and ensure that subrecipients and developers use the fair housing logo on advertising material.</li> </ol>	2015-2019	<ol style="list-style-type: none"> <li>1. Increased access to affordable housing</li> <li>2. Educated residents have knowledge of fair housing laws</li> <li>3. Increase in calls and consumer questions related to fair housing</li> <li>4. Reduced incidence of discrimination in the rental and sale of housing</li> </ol>
2. Lack of adequate data to determine fair housing violations and complaints within the City	<ol style="list-style-type: none"> <li>1. Work with state, local, and federal fair housing agencies to implement a structure that will allow all local governments and residents to gain access to information on fair housing complaints and how they are being addressed.</li> <li>2. Advise HUD field office of the need for published data that will give local government's access to complaints filed.</li> <li>3. Attend fair housing meetings and workshops and encourage and support a coordinated reporting system that provides information to local governments on fair housing complaints.</li> </ol>	2015-2019	<ol style="list-style-type: none"> <li>1. Improved information on complaints recorded will lead to better programs and services to address fair housing issues</li> </ol>
3. Outdated City	<ol style="list-style-type: none"> <li>1. Adopt new Equal Opportunity/Affirmative Fair Housing Marketing</li> </ol>	2015-2019	<ol style="list-style-type: none"> <li>1. Improved compliance and awareness of fair</li> </ol>

policies on affirmatively furthering fair housing choice	<p>Procedures for all of the federal and state housing programs.</p> <ol style="list-style-type: none"> <li>2. Update the City's Affirmative Fair Housing Marketing Plan.</li> <li>3. Incorporate needs identified in the Consolidated Plan into the 2016 Local Housing Assistance Plan.</li> <li>4. Adopt or incorporate by reference the HHA Reasonable Accommodation Policy for City of Hialeah owned properties.</li> <li>5. Adopt by reference the HHA Admission and Continued Occupancy Policy for City of Hialeah owned properties.</li> <li>6. Update outreach for the City, subrecipients and non-profits to include outreach on websites, Facebook and other social media.</li> </ol>		housing laws and requirements by staff, developers, contractors and subrecipients
4. Lack of awareness by stakeholders, landlords, realtors, non-profits, for profit organizations and residents of Miami-Dade County Fair Housing Ordinance	<ol style="list-style-type: none"> <li>1. Educate stakeholders, landlords, realtors, non-profit and for profit entities, subrecipients and developers on the new Fair Housing Ordinance adopted by Miami-Dade County.</li> <li>2. Amend all documents and agreements that reference fair housing to include the specific requirements of the new Miami-Dade County ordinance.</li> <li>3. Begin media campaign with the City website, Facebook and written material and flyers to educate the public (including landlords, realtors and residents) of the new ordinance.</li> <li>4. Use HUD resources to distribute information and fair housing posters located at the following link: <a href="http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opportunity/marketing">http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opportunity/marketing</a></li> </ol>	2015-2019	<ol style="list-style-type: none"> <li>1. Increased awareness of Miami-Dade County Ordinance within the City of Hialeah</li> <li>2. Compliance by affected parties with the Miami-Dade County Ordinance</li> </ol>
5. Insufficient supply of affordable rental housing	<ol style="list-style-type: none"> <li>1. Encourage development of affordable rental housing by providing affordable housing incentives to developers and builders.</li> <li>2. Use federal and state resources to develop affordable rental housing</li> <li>3. Leverage resources under the housing programs to increase the number of units developed for affordable housing.</li> <li>4. Work with the City administration to create additional incentives for the development of affordable housing.</li> <li>5. Apply for funding resources available for the development of rental housing.</li> <li>6. Consider innovative tools for expanding affordable housing supply, such as adopting a mandatory inclusionary zoning ordinance, allowing homeowners in R-1 zoning districts to lease secondary dwellings to unrelated tenants, and allowing accessory dwelling units in the Hialeah annexed area.</li> </ol>	2015-2019	Increased affordable rental housing developments in the City
6. Insufficient supply of affordable housing	<ol style="list-style-type: none"> <li>1. Encourage the use federal and state funding resources to assist buyers to purchase homes at affordable prices by providing purchase assistance.</li> </ol>	2015-2019	<ol style="list-style-type: none"> <li>1. Increased supply of affordable units for purchase</li> <li>2. Increase in educated buyers entering the market</li> </ol>

for purchase by low and moderate income families	<ol style="list-style-type: none"> <li>2. Require buyers to work with non-predatory lenders in obtaining first mortgages.</li> <li>3. Encourage, support and provide financial incentives (when available) to developers for the production of affordable housing for purchase.</li> <li>4. Require homebuyer counseling for buyers participating in purchase assistance programs.</li> <li>5. Educate Realtors and other partners on the laws related to fair housing and encourage them to educate buyers on fair housing laws.</li> <li>6. Consider innovative tools for expanding affordable housing supply, such as adopting a mandatory inclusionary zoning ordinance.</li> </ol>		3. Increase in educated Realtors selling homes
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## Exhibit 1: Online English and Spanish Survey Results