

## V.B. GENERAL ISSUES

### *i. Segregation/Integration*

#### 1. Analysis

- a. Describe and compare segregation levels in the jurisdiction and region. Identify the racial/ethnic groups that experience the highest levels of segregation.

For the purposes of the AFH, “segregation” means a condition, within the program the scope of the analysis, as guided by the Assessment Tool, in which there is a high concentration of persons of a particular race, color, religion, sex, familial status, national origin, or having a disability or a type of disability in a particular geographic area when compared to a broader geographic area. “Integration” means a condition, within the in which there is not a high concentration of persons of a particular race, color, religion, sex, familial status, national origin, or having a disability or a type of disability in a particular geographic area when compared to a broader geographic area.

In analyzing levels of segregation, HUD has provided a dissimilarity index (HUD Table 3), which measures the extent two groups are evenly distributed across in the city and region. Index values range from 0 to 100, with higher numbers representing a higher degree of segregation among the two groups measured. Generally, values between 0 and 39 indicate low segregation, values between 40 and 54 indicate moderate segregation, and values between 55 and 100 indicate a high level of segregation.

Currently in Nashville, Black/White and Hispanic/White have high levels of segregation, while Non-White/White have a moderate level of segregation, and Asian or Pacific Islander/White in the upper range for low segregation.

Within the region, there is a high level of segregation among Black/White, with moderate levels for Non-White/White Hispanic/White Asian or Pacific Islander/White.

**HUD Table 3: Racial/Ethnic Dissimilarity Trends**

	(Nashville-Davidson, TN CDBG, HOME, ESG) Jurisdiction				(Nashville-Davidson--Murfreesboro--Franklin, TN) Region			
Racial/Ethnic Dissimilarity Index	1990 Trend	2000 Trend	2010 Trend	Current	1990 Trend	2000 Trend	2010 Trend	Current
Non-White/White	59.28	47.24	44.00	47.77	54.78	49.64	46.53	50.31
Black/White	64.63	54.23	49.51	53.90	59.68	56.45	54.19	57.67
Hispanic/White	19.52	45.54	49.39	52.36	24.63	44.99	47.14	49.45
Asian or Pacific Islander/White	33.82	32.69	31.36	38.75	46.13	43.53	39.58	45.45

Note 1: Data Sources: Decennial Census

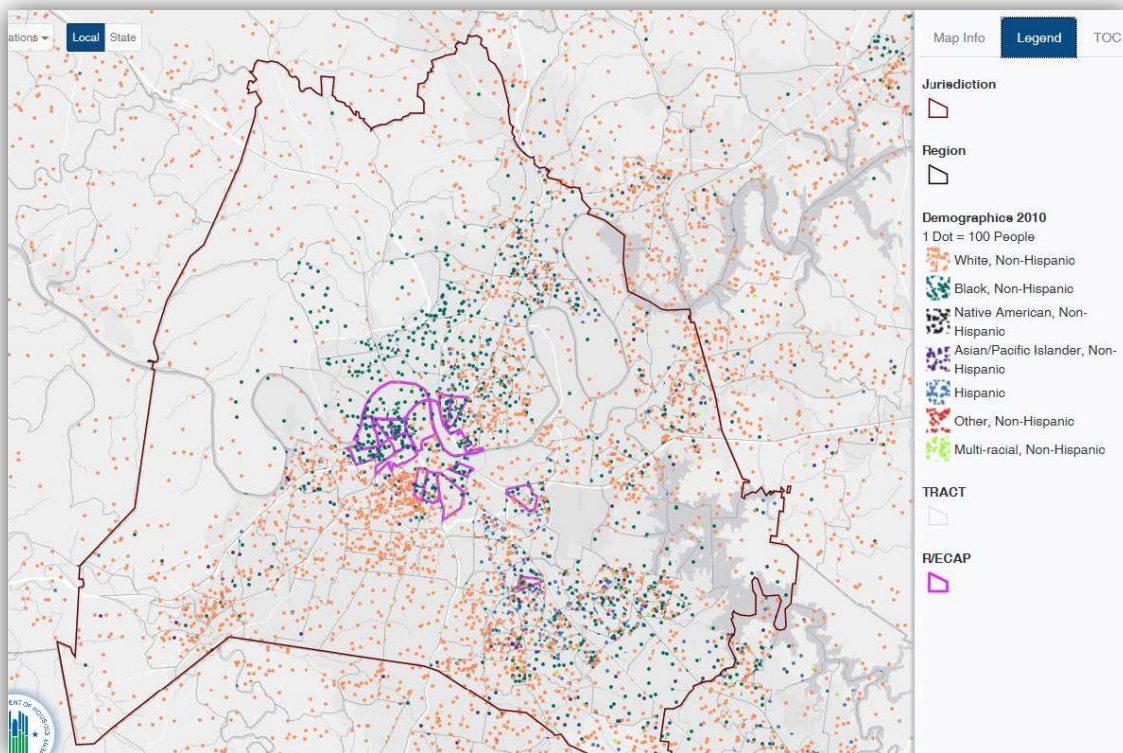
Note 2: Refer to the Data Documentation for details ([www.hudexchange.info](http://www.hudexchange.info)).

- b. Identify areas in the jurisdiction and region with relatively high segregation and integration by race/ethnicity, national origin, or LEP group, and indicate the predominant groups living in each area.

### Race/Ethnicity

HUD Map 1 shows the distribution of the population by race and ethnicity in Nashville. As illustrated by the map, North Nashville, Bordeaux, as well as R/ECAP areas (in which public housing properties are located) are highly segregated, African-American areas. White populations are concentrated in areas to the south of downtown – Green Hills, Oak Hill, and Forest Hills – and more rural areas of the county. The southeastern area of the county shows integration but reflects a concentration of the Hispanic population.

**HUD Map 1: Race & Ethnicity  
Nashville**

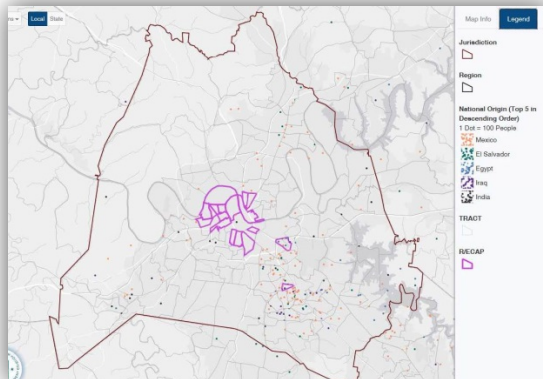


### National Origin & LEP

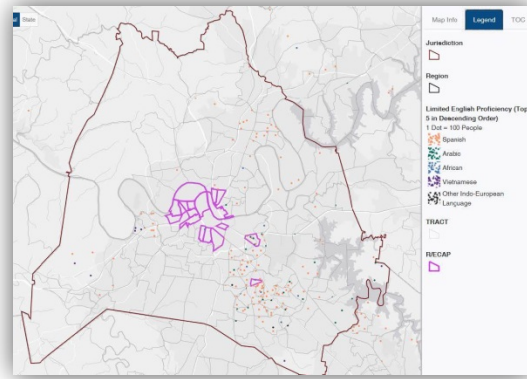
As shown in HUD Map 2, a large percentage of the foreign-born residents from the top five represented countries are heavily concentrated in the southeast area of Davidson County (Antioch). Residents from Mexico, the largest foreign-born group, also can be found in the northwestern section of the city, as well as in the western section to a lesser extent.

As expected, based on Map 3, Map 4 shows a concentration of the LEP population in the Antioch area. LEP Spanish is concentrated in the southeastern, northeastern, and western parts of the city. LEP Arabic and LEP African are concentrated in the southeastern part of the city. LEP Vietnamese is more scattered across the city than the other languages, but there is a cluster in the western part of the city.

**HUD Map 3: National Origin  
Nashville**



**HUD Map 4: LEP  
Nashville**



**c. Explain how these segregation levels and patterns in the jurisdiction and region have changed over time (since 1990).**

- Nashville**

As Nashville's population increased by 115,888 people since 1990, levels of segregation fluctuated for all groups. As shown in HUD Table 3, the dissimilarity index between the White/Non-White populations dropped from 59.28 in 1990 to 47.24 in 2000 to 44.00 in 2010. The current rate ticked up slightly to 47.77.

The Black/White populations consistently experienced the highest levels of segregation. In 1990, the dissimilarity index between the groups was 64.63, falling to 54.23 in 2000 and 49.51 in 2010. The current rate stood at 53.90.

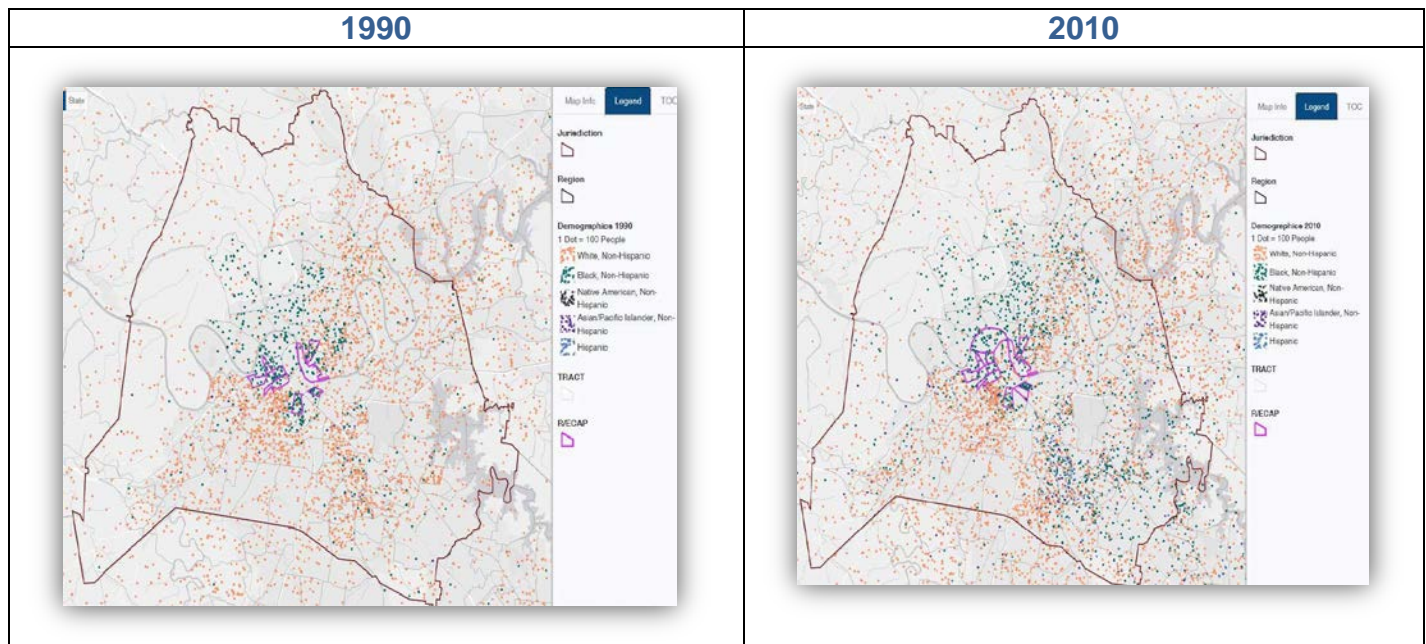
Segregation between Hispanics/Whites grew as Nashville's Hispanic population exploded by 56,420 people since 1990. In 1990, their dissimilarity index was 19.52, the lowest rate among all groups for all years. By 2000, that number climbed to 45.54 and continued upward to 49.39 in 2010 and 52.36 currently.

The only groups to experience consistently low levels of segregation were Asian-Pacific Islanders/Whites. Their dissimilarity index was 33.82 in 1990, 32.69 in 2000, 31.36 in 2010, and 38.75 currently.



The following HUD maps show the race and ethnicity trends in Nashville from 1990 to 2010. Noticeable is the population growth, with diverse populations, in the southeast area of Davidson County. Areas with high concentrations of Black or White populations have not really changed.

## HUD MAP 2: Race & Ethnicity Trends Nashville



- **Nashville-Davidson—Murfreesboro—Franklin, TN Region**

In the region, the dissimilarity index between Whites/Non-Whites hit a high of 54.78 in 1990. The index dropped to 49.64 in 2000 and 46.53 in 2010. It increased to 50.31 in the current year.

Like Nashville, the region's Black/White populations were the most segregated from each other. They consistently had the highest dissimilarity index among all groups. It was 59.68 in 1990, 56.45 in 2000, 54.19 in 2010, and 57.67 currently.

At the regional level, segregation patterns between Hispanics/Whites closely followed those of Nashville as the Hispanic population boomed by 107,252 people from 1990 to 2010. They experienced an increase from 24.63 in 1990 to 44.99 in 2000. The index increased slightly to 47.14 in 2010 and 49.45 currently.

Segregation between Asian-Pacific Islanders/Whites remained moderate from 1990 through the current year. The dissimilarity index was 46.13 in 1990. It fell to 43.53 in 2000 and 39.58 in 2010. The index rose to 45.45 in the current year.

- d. Consider and describe the location of owner and renter occupied housing in the jurisdiction and region in determining whether such housing is located in segregated or integrated areas, and describe trends over time.

HUD Table 16 below shows that in Nashville and the region Black and Hispanic households tend to rent rather than own, while White households tend to own.

**HUD Table 16: Homeownership and Rental Rates by Race/Ethnicity**

	(Nashville-Davidson, TN CDBG, HOME, ESG) Jurisdiction				(Nashville-Davidson--Murfreesboro--Franklin, TN) Region			
	Homeowners		Renters		Homeowners		Renters	
Race/Ethnicity	#	%	#	%	#	%	#	%
White, Non-Hispanic	103,280	73.56%	59,565	51.19%	364,950	85.01%	136,705	63.16%
Black, Non-Hispanic	26,634	18.97%	40,429	34.75%	41,540	9.68%	53,990	24.95%
Hispanic	5,183	3.69%	11,464	9.85%	10,985	2.56%	17,295	7.99%
Asian or Pacific Islander, Non-Hispanic	3,523	2.51%	2,864	2.46%	7,169	1.67%	4,767	2.20%
Native American, Non-Hispanic	266	0.19%	215	0.18%	840	0.20%	414	0.19%
Other, Non-Hispanic	1,472	1.05%	1,850	1.59%	3,835	0.89%	3,239	1.50%
Total Household Units	140,395	-	116,355	-	429,325	-	216,430	-
Note 1: Data presented are numbers of households, not individuals.								
Note 2: Data Sources: CHAS								
<a href="http://www.hudexchange.info">Note 3: Refer to the Data Documentation for details (www.hudexchange.info).</a>								

2015 Home Mortgage Loan Disclosure Act (HMDA) data for the Nashville-Davidson MSA on the following pages shows that for FHA, FSA/RHS, and VA home purchase loans (1-4 family and manufactured homes), Native Hawaiian/Other Pacific Islander households had the highest total percentage of loans originated (88.24%), followed by White households (76.51%). Black households had the lowest total percentage of loans originated (68.52%) and the highest total percentage of applications denied (15.97%). American Indian/Alaskan Native households had the lowest total percentage of applications denied (7.50%), followed by White households (9.30%).

For conventional loans, White households had the highest total percentage of loans originated (77.51%) and the lowest total percentage of applications denied (7.42%). Black households had the lowest total percentage of loans originated (65.54%) and the highest percentage of applications denied (17.57%).

White households submitted more total applications for conventional loans (23,273) than for FHA, FSA/RHS, and VA home purchase loans (13,053); Black households submitted twice as applications for FHA, FSA/RHS, and VA home purchase loans (1,922) than for conventional loans (888).

Of the total number of applications for FHA, FSA/RHS, and VA home purchase loans submitted in 2015 (16,543), 78.90% of applications were from White households and 11.62% from Black households. For conventional loans, 82.20% of applications were from White households, while only 3.14% of the applications were from Black households.

## 2015 Home Mortgage Disclosure Act Data (HMDA)

### AGGREGATE TABLE 4-1: DISPOSITION OF APPLICATIONS FOR FHA, FSA/RHS, AND VA HOME-PURCHASE LOANS, 1- TO 4-FAMILY AND MANUFACTURED HOME

DWELLINGS, BY RACE, ETHNICITY, GENDER AND INCOME OF APPLICANT, 2015  
MSA/MD: 34980 - NASHVILLE-DAVIDSON--MURFREESBORO--FRANKLIN, TN

RACE AND GENDER 5/ 18/ 19/	Applications Received 20/		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	#	\$000's	#	%	#	%	#	%	#	%	#	%
AMERICAN INDIAN/ALASKA NATIVE (TOTAL)	40	7142	30	75.00%	1	2.50%	3	7.50%	2	5.00%	4	10.00%
MALE	20	3827	13	65.00%	1	5.00%			2	10.00%	4	20.00%
FEMALE	15	2155	13	86.67%			2	13.33%				
JOINT (MALE/FEMALE)	5	1160	4	80.00%			1	20.00%				
ASIAN (TOTAL)	247	44501	174	70.45%	11	4.45%	34	13.77%	26	10.53%	2	0.81%
MALE	145	24477	98	67.59%	6	4.14%	23	15.86%	16	11.03%	2	1.38%
FEMALE	43	7547	34	79.07%	2	4.65%	2	4.65%	5	11.63%		
JOINT (MALE/FEMALE)	57	12246	40	70.18%	3	5.26%	9	15.79%	5	8.77%		
BLACK OR AFRICAN AMERICAN (TOTAL)	1922	356790	1317	68.52%	68	3.54%	307	15.97%	193	10.04%	37	1.93%
MALE	689	130536	460	66.76%	20	2.90%	116	16.84%	77	11.18%	16	2.32%
FEMALE	836	136685	573	68.54%	32	3.83%	143	17.11%	75	8.97%	13	1.56%
JOINT (MALE/FEMALE)	396	89280	283	71.46%	16	4.04%	48	12.12%	41	10.35%	8	2.02%
NATIVE HAWAIIAN/OTHER PACIFIC ISLND (TOTAL)	17	3451	15	88.24%			2	11.76%				
MALE	4	757	4	100.00%								
FEMALE	8	1424	7	87.50%			1	12.50%				
JOINT (MALE/FEMALE)	5	1270	4	80.00%			1	20.00%				
WHITE (TOTAL)	13053	2500097	9987	76.51%	357	2.74%	1226	9.39%	1319	10.10%	164	1.26%
MALE	5306	980769	4004	75.46%	141	2.66%	563	10.61%	527	9.93%	71	1.34%
FEMALE	3262	535952	2479	76.00%	97	2.97%	311	9.53%	338	10.36%	37	1.13%
JOINT (MALE/FEMALE)	4464	979678	3493	78.25%	118	2.64%	348	7.80%	450	10.08%	55	1.23%
2 OR MORE MINORITY RACES (TOTAL)	3	408	1	33.33%			1	33.33%	1	33.33%		
MALE	3	408	1	33.33%			1	33.33%	1	33.33%		
FEMALE												
JOINT (MALE/FEMALE)												
JOINT (WHITE/MINORITY RACE) (TOTAL)	221	49767	165	74.66%	6	2.71%	17	7.69%	30	13.57%	3	1.36%
MALE	16	3715	9	56.25%			4	25.00%	3	18.75%		
FEMALE	16	2898	8	50.00%			4	25.00%	4	25.00%		
JOINT (MALE/FEMALE)	189	43154	148	78.31%	6	3.17%	9	4.76%	23	12.17%	3	1.59%
RACE NOT AVAILABLE (TOTAL) 6/	1040	205332	668	64.23%	22	2.12%	170	16.35%	142	13.65%	38	3.65%
MALE	206	37565	135	65.53%	2	0.97%	33	16.02%	25	12.14%	11	5.34%
FEMALE	138	22852	81	58.70%	5	3.62%	22	15.94%	26	18.84%	4	2.90%
JOINT (MALE/FEMALE)	149	34586	99	66.44%	5	3.36%	26	17.45%	15	10.07%	4	2.68%

Report Date: 06/21/2016

## 2015 Home Mortgage Disclosure Act Data (HMDA)

**AGGREGATE TABLE 4-2: DISPOSITION OF APPLICATIONS FOR CONVENTIONAL HOME-PURCHASE LOANS, 1- TO 4-FAMILY AND MANUFACTURED HOME**

DWELLINGS, BY RACE, ETHNICITY, GENDER AND INCOME OF APPLICANT, 2015  
MSA/MD: 34980 - NASHVILLE-DAVIDSON--MURFREESBORO--FRANKLIN, TN

RACE AND GENDER 5/ 18/ 19/	Applications Received 20/		Loans Originated		Apps. Approved But Not Accepted			Applications Denied			Applications Withdrawn			Files Closed For Incompleteness			
	#	\$000's	#	%	\$000's	#	%	\$000's	#	%	\$000's	#	%	\$000's	#	%	\$000's
AMERICAN INDIAN/ALASKA NATIVE (TOTAL)	88	13654	64	72.73%	10569				13	14.77%	1729	6	6.82%	1015	5	5.68%	341
MALE	27	5250	21	77.78%	4243				3	11.11%	378	2	7.41%	506	1	3.70%	123
FEMALE	16	2475	8	50.00%	1395				3	18.75%	568	3	18.75%	394	2	12.50%	118
JOINT (MALE/FEMALE)	18	2779	11	61.11%	2321				4	22.22%	243	1	5.56%	115	2	11.11%	100
ASIAN (TOTAL)	889	226308	631	70.98%	159078	45	5.06%	12925	85	9.56%	19372	101	11.36%	28144	27	3.04%	6789
MALE	422	106867	308	72.99%	77905	23	5.45%	6573	35	8.29%	7861	40	9.48%	10236	16	3.79%	4292
FEMALE	160	36019	107	66.88%	23648	9	5.63%	2121	24	15.00%	4739	17	10.63%	5045	3	1.88%	466
JOINT (MALE/FEMALE)	306	83201	216	70.59%	57525	13	4.25%	4231	26	8.50%	6772	43	14.05%	12642	8	2.61%	2031
BLACK OR AFRICAN AMERICAN (TOTAL)	888	169677	582	65.54%	118493	44	4.95%	8060	156	17.57%	25174	77	8.67%	14481	29	3.27%	3469
MALE	288	58300	191	66.32%	42222	12	4.17%	2248	46	15.97%	6391	26	9.03%	6034	13	4.51%	1405
FEMALE	380	60478	238	62.63%	39609	19	5.00%	3397	73	19.21%	10966	37	9.74%	5007	13	3.42%	1499
JOINT (MALE/FEMALE)	218	50489	151	69.27%	36252	13	5.96%	2415	37	16.97%	7817	14	6.42%	3440	3	1.38%	565
NATIVE HAWAIIAN/OTHER PACIFIC ISLND (TOTAL)	35	7871	26	74.29%	6110				4	11.43%	673	5	14.29%	1088			
MALE	13	2428	10	76.92%	1741				2	15.38%	473	1	7.69%	214			
FEMALE	11	2027	8	72.73%	1521				1	9.09%	90	2	18.18%	416			
JOINT (MALE/FEMALE)	11	3416	8	72.73%	2848				1	9.09%	110	2	18.18%	458			
WHITE (TOTAL)	23273	5723005	18038	77.51%	4510317	826	3.55%	201059	1726	7.42%	350868	2184	9.38%	573622	499	2.14%	87139
MALE	7637	1886687	5829	76.33%	1451432	284	3.72%	75530	627	8.21%	132011	716	9.38%	195088	181	2.37%	32626
FEMALE	4971	961539	3822	76.89%	756262	164	3.30%	31021	406	8.17%	62405	466	9.37%	95039	113	2.27%	16812
JOINT (MALE/FEMALE)	10608	2862416	8351	78.72%	2293198	376	3.54%	94157	685	6.46%	155353	996	9.39%	282483	200	1.89%	37225
2 OR MORE MINORITY RACES (TOTAL)	6	709	3	50.00%	492				2	33.33%	73	1	16.67%	144			
MALE	1	144										1	100.00%	144			
FEMALE	4	326	2	50.00%	253				2	50.00%	73						
JOINT (MALE/FEMALE)	1	239	1	100.00%	239												
JOINT (WHITE/MINORITY RACE) (TOTAL)	302	82060	217	71.85%	60999	10	3.31%	3010	26	8.61%	5495	38	12.58%	10679	11	3.64%	1877
MALE	15	3990	10	66.67%	3000				1	6.67%	143	3	20.00%	740	1	6.67%	107
FEMALE	6	1083	4	66.67%	788				2	33.33%	295						
JOINT (MALE/FEMALE)	281	76987	203	72.24%	57211	10	3.56%	3010	23	8.19%	5057	35	12.46%	9939	10	3.56%	1770
RACE NOT AVAILABLE (TOTAL) 6/	2830	788775	2008	70.95%	582764	86	3.04%	22519	288	10.18%	60204	334	11.80%	98628	114	4.03%	24660
MALE	333	72616	190	57.06%	45422	15	4.50%	3087	53	15.92%	8434	51	15.32%	12117	24	7.21%	3556
FEMALE	186	32250	109	58.60%	21123	10	5.38%	1669	32	17.20%	3301	27	14.52%	5456	8	4.30%	701
JOINT (MALE/FEMALE)	359	95110	239	66.57%	66098	11	3.06%	2243	45	12.53%	7437	49	13.65%	17060	15	4.18%	2272

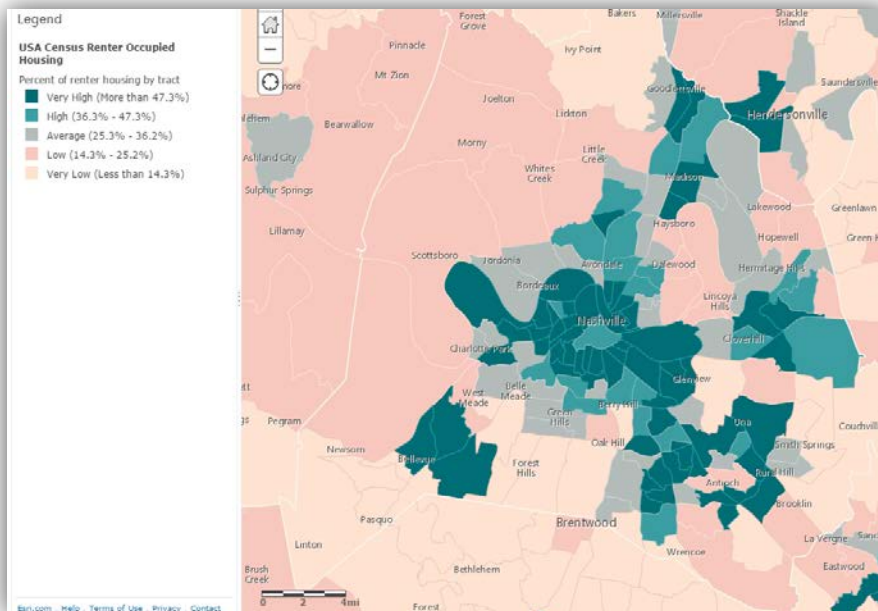
Report Date: 6/21/2016



The following U.S. Census map, modified April 27, 2017, shows the location of renter occupied housing by census tract in Nashville. In comparing with Map 1, areas with very high percentages of rental housing tend to be in areas with very high percentages of Black and Hispanic populations. Areas with very low percentages of renter occupied housing are White.

### USA Census Renter Occupied Housing

(Source:<https://www.arcgis.com/home/item.html?id=9ac40002542d499797d54b40f67bc747>)



- e. **Discuss whether there are any demographic trends, policies, or practices that could lead to higher segregation in the jurisdiction in the future. Participants should focus on patterns that affect the jurisdiction and region rather than creating an inventory of local laws, policies, or practices.**

Due to high land cost, it is cost-prohibitive to develop affordable housing in certain areas of the county, primarily in high opportunity areas. Affordable housing is often sited in areas that have high racial and ethnic concentrations (as well as high poverty) due to land cost and the availability of publicly-owned property, which likely resulted from tax foreclosure. Although the affordable housing need is being addressed, this tends to perpetuate segregation.

For some Muslims, the path to homeownership is particularly difficult because Sharia Law prohibits the collection of interest, which, in effect, bars them from applying for conventional loans. In addition, lending information and documents are usually only in English, making lending programs inaccessible to persons with limited English proficiency.

## 2. Additional Information

- a. **Beyond the HUD-provided data, provide additional relevant information, if any, about segregation in the jurisdiction and region affecting groups with other protected characteristics.**

An analysis related to segregation and publicly supported housing is provided in section C.1.b., and an analysis related to segregation and disability and access is provided in section D.1.a.

- b. **The program participant may also describe other information relevant to its assessment of segregation, including activities such as place-based investments and geographic mobility options for protected class groups.**

### CDBG Place-Based Strategy

In developing the 2013-2018 Consolidated Plan, MDHA received significant input regarding the uneven distribution of resources in areas with high concentrations of poverty, which also have high concentrations of minority populations. As a result, MDHA implemented a place-based strategy for community development to target the use of CDBG funds for certain activities. Census tracts in which MDHA Public Housing is located are within the Tier 2 targeted area and funding has been used to assist with planning efforts, business technical assistance, neighborhood facility projects, and infrastructure improvements.

### Barnes Housing Trust Fund

In 2013, the Barnes Housing Trust Fund was created as Metro Nashville's first housing trust fund to leverage affordable housing developments countywide. Named after Reverend Bill Barnes, a longstanding advocate for affordable housing and the deconcentration of poverty, the Barnes Fund provides funding to nonprofit developers to build affordable housing. In July 2016, Mayor Barry increased the funding of the Barnes Fund to \$40M over the course of four years, with an annual commitment of \$10M from the Mayor—the largest investment to date. The Barnes Fund has invested over \$14 million in affordable housing using Barnes Fund and leveraged over \$50M with federal and private funding sources, funding more than 500 housing units. The Barnes Fund currently has one dedicated funding source through fees from Short Term Rental permits. To date, the Barnes Fund has received over \$600,000 in dedicated funding.

### Housing Incentive Pilot Program

In 2016, Metro launched the Housing Incentives Pilot Program (HIPP) designed to motivate private developers to incorporate affordable and workforce units into their apartment, condo, or housing developments. This voluntary program encourages mixed-income housing, primarily in the urban core and along major pikes and transportation corridors.

## Mayor's Office of New Americans

The Mayor's Office of New Americans works to engage immigrants and empower them to participate in government and the community. MyCity Academy, one of the Office's programs, is a free leadership-training program that empowers New Americans to understand and participate in Metro Government. Parent Ambassadors pair New American parents who are veterans of Metro Schools with immigrant and refugee families whose children are newly enrolled. Pathway for New Americans is a partnership between Metro Government and U.S. Citizenship and Immigration Services that supports immigrants in Nashville who aspire to become U.S. citizens. The Mayor's New Americans Advisory Council ensures that New American leaders have a voice in Metro Government.

## MDHA Redevelopment ("Envision") Plans

In March 2013, MDHA embarked on a planning process dubbed "Envision Cayce" to create a master plan for revitalizing Cayce public housing. The subsequent plan calls for creating a vibrant mixed-use, mixed-income neighborhood in an area that currently has a high minority concentration and a high concentration of poverty, has few amenities, and is isolated from the rest of the vibrant East Nashville community. The mixed-income component includes a commitment to 1-for-1 replacement of all 716 units of public housing, as well as new workforce and market rate housing, fully integrated within building. Information about Envision Cayce is available at: <http://www.nashville-mdha.org/?p=1616>.

MDHA hopes to replicate this plan throughout its portfolio of older public housing stock. In 2016, MDHA was awarded a \$500,000 Choice Neighborhoods Planning grant to support "Envision Napier and Sudekum". Planning efforts will focus on transforming distressed public housing as well as the surrounding neighborhoods of concentrated poverty into viable mixed-income areas. More information is available at: <http://www.nashville-mdha.org/choice-neighborhoods/>.

## Promise Zone Designation

On June 6, 2016, Nashville was named a Promise Zone community. The Nashville Promise Zone boundary is 46-square miles and includes North Nashville and several of MDHA's public housing properties, which are highly segregated, as well as part of the Nolensville Road corridor where the Hispanic population is concentrated. In close partnership, MDHA, the Mayor's Office, and six (6) Implementation Partners will work to address the goals of creating jobs; increasing economic activity; improving educational opportunities; reducing violent crime; increasing access to affordable housing; and improving community infrastructure. One of the benefits of receiving Promise Zone designation is the ability of organizations that serve residents in the Promise Zone to receive preference points in certain federal funding opportunities announced by Promise Zone partner agencies.

## REAL (Race, Equity and Leadership) Community Conversations and Resources

An initiative led by the Mayor's Office of Neighborhoods and Community Engagement, REAL conversations include:

- Nashville Shop Talks – Shop Talk takes place once a month at a different barber, beauty, or coffee shop in the city. This is one way to continue to have this dialogue on the grassroots level out in the community, taking the conversation and meeting people where they are.
- Nashville Unites Meeting – Nashville Unites is an initiative founded by the Late Francis Guess and Bishop Joseph Walker, III after the incidents that occurred in Ferguson, MO. The goal of Nashville Unites is to bring together various organizations and individuals that want to be part of the solution for racial equity. Those that participate in Nashville Unites will have the opportunity to work on strategy and policy recommendations on issues that impact racial equity. The current committees of Nashville Unites are working on making policy recommendations from the President's Task Force Report on 21st Century Policing, making recommendations for a Citizens Review Board, creating a new economy with new economic opportunities and creating a community resource locator.
- "REAL Talk" A Forum on Race, Equity and Leadership – On September 10, 2016, Mayor Megan Barry brought over a thousand Nashvillians together at the Music City Center for a citywide conversation. Groups discussed key topic areas: community empowerment, the criminal justice system, data/information, diversity/inclusion, health disparities, housing/gentrification, New American communities, public education/youth, public safety/policing, and workforce/jobs.

### **3. Contributing Factors**

*Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of segregation.*

The following contributing factors were identified through the data analysis and during the community engagement process.

- **Community opposition**
  - It's hard to get property rezoned in traditional neighborhoods for multi-family or high density development.
  - There is a stigma associated with "affordable housing" that perpetuates NIMBYism
  - "One of the most enduring myths about affordable housing is that it will decrease housing values in a neighborhood." (*New Look of Affordable Housing-Nashville.gov*)

- **Displacement of residents due to economic pressures**

- Low-income African-Americans feel like they are being pushed out of their neighborhoods. Some residents are receiving intimidating flyers on their doors.
- It was reported that developers coming into “hot markets” are contacting the Codes Department as a means to force people to sell their home.
- Residents are worried about property taxes.
- “As housing costs increase, residents become cost burdened and must seek more affordable housing elsewhere. In many neighborhoods, this has resulted in the displacement and drastic neighborhood change as existing homes are upgraded or replaced with new construction.” (*HUDII – 190 Adopted June 22, 2015 Housing*)

- **Lack of private investments in specific neighborhoods**

- Residents in traditional African-American communities, such as Bordeaux, would like to attract businesses that are in other parts of the city and feel as if the community has been passed over when it comes to investment. They want to be able to shop and eat dinner without having to drive to another part of the city.
- Residents in Bordeaux and Antioch would like to see incentives for locally owned businesses.

- **Lack of public investments in specific neighborhoods, including services or amenities**

- Residents in Bordeaux, North Nashville, and Antioch echoed the need for sidewalks; and it was reported that the storm water and sewer systems in North Nashville are outdated.
- “Only about half of Nashville’s roads currently have sidewalks, and no one knows where to find the money to cover the rest of them. The sidewalk situation even became a point of contention in last year’s mayoral campaign.” (*Martin, Rachel. “Walking in Nashville.” City Lab. 6, Jan. 2017*)

- **Land use and zoning laws**

- Residents feel that inclusionary zoning should to be applied equitably in the county and not concentrated in certain areas of town, particularly in areas where affordable housing already exists.
- There is concern that the General Assembly will strike down Metro’s Inclusionary Housing law.

- **Lending discrimination**

- African-Americans and Hispanics feel like they receive higher rates on loans than Whites.



- Conventional methods for financing a home purchase bar some Muslims from purchasing a home.
- The lack of documents/information for persons with limited English proficiency makes lending programs inaccessible.
- “But now, First Tennessee has run afoul of HUD lending rules again, as HUD announced Monday that it reached a settlement with First Tennessee over allegations that the bank violated the Fair Housing Act by discriminating against African-American and Hispanic mortgage loan applicants by denying them mortgage loans, and by allegedly failing to place bank branches in minority-concentrated areas.” (Lane, Ben. “First Tennessee Bank reaches \$1.9 million settlement over discriminatory lending.” *Housing Wire*. 1, Feb.2016.)

- **Location and type of affordable housing**

- There is a lack of affordable housing for families. (*This can be evidenced by waiting lists for MDHA family properties. See V.C.*)
- Residents feel that a lot of affordable housing is not located in safe areas or in areas with healthy food or access to transportation.

- **Loss of affordable housing**

- Apartments are being sold from under tenants, who are only given 30 days’ notice to move. Many tenants affected are immigrants who do not understand the notices.
- Formerly affordable apartments are being sold or landlords choose to remodel and increase rents.
- According to the Mayor’s *Housing Nashville Report*, Nashville has lost more than 20% of its affordable housing stock since 2000.

- **Occupancy codes and restrictions**

- Overcrowding is perceived differently when low income people live together than it is when a group of musicians live together in East Nashville.

- **Private discrimination**

- Landlords use arrest records and criminal affidavits, rather than criminal history, when considering an application. Many landlords do not make their criminal history policy publicly available and it is applied arbitrarily.

- **Source of income discrimination**

- Residents and advocates reported that landlords charge exorbitant rents when the tenant does not have a social security card and landlords charge extra fees when the tenant has a voucher or ask the tenant how s/he will pay for utilities.

- Landlords refuse voucher-holders who have no income in favor of a voucher-holder with an income.

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## ***ii. Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs)***

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### **1. Analysis**

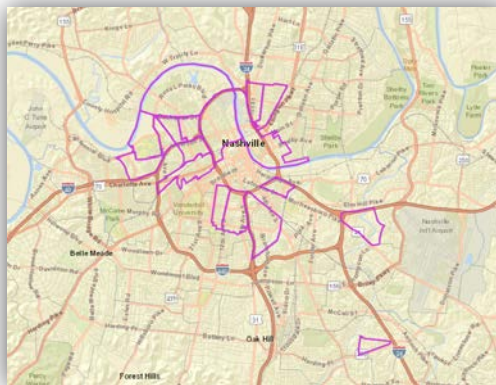
#### **a. Identify any R/ECAPs or groupings of R/ECAP tracts within the jurisdiction and region.**

HUD definition of R/ECAP involves a racial/ethnic concentration threshold and a poverty test. The racial/ethnic threshold is that a census tract must have a non-white population of 50% or more. To meet the poverty test, a census tract has a poverty rate that exceeds 40% or more of individuals in the census tract living at or below the poverty line or the poverty rate is three times the average for the MSA, whichever is lower. (For Nashville, the former applies.) Census tracts that meet both the racial/ethnic thresholds and the poverty test are deemed R/ECAPs.

Based on data from HUD Map 1, the following 19 census tracts are in R/ECAPs. As the map shows, nearly all R/ECAPs ring the core of downtown Nashville, with outlying R/ECAPs in Antioch and the Glendale area.

**HUD Map 1: R/ECAP Census Tracts**

11800	14800
12600	15803
13061	16000
13602	16100
13700	16200
13800	16300
13900	19005
14200	19300
14300	19400
14400	



#### **b. Describe and identify the predominant protected classes residing in R/ECAPs in the jurisdiction and region. How do these demographics of the R/ECAPs compare with the demographics of the jurisdiction and region?**

The only R/ECAPs in the region are in Nashville. The predominant protected class living in R/ECAPs is the Black population, comprising 70.32% of the people living in R/ECAPs. Compared with the rest of Nashville, the Black population is overrepresented in R/ECAPs as it represents only 28.1% of the city's total population. The number of families with children in R/ECAPs is also overrepresented at 56.82% of the R/ECAP population but 44.70% of the total population.

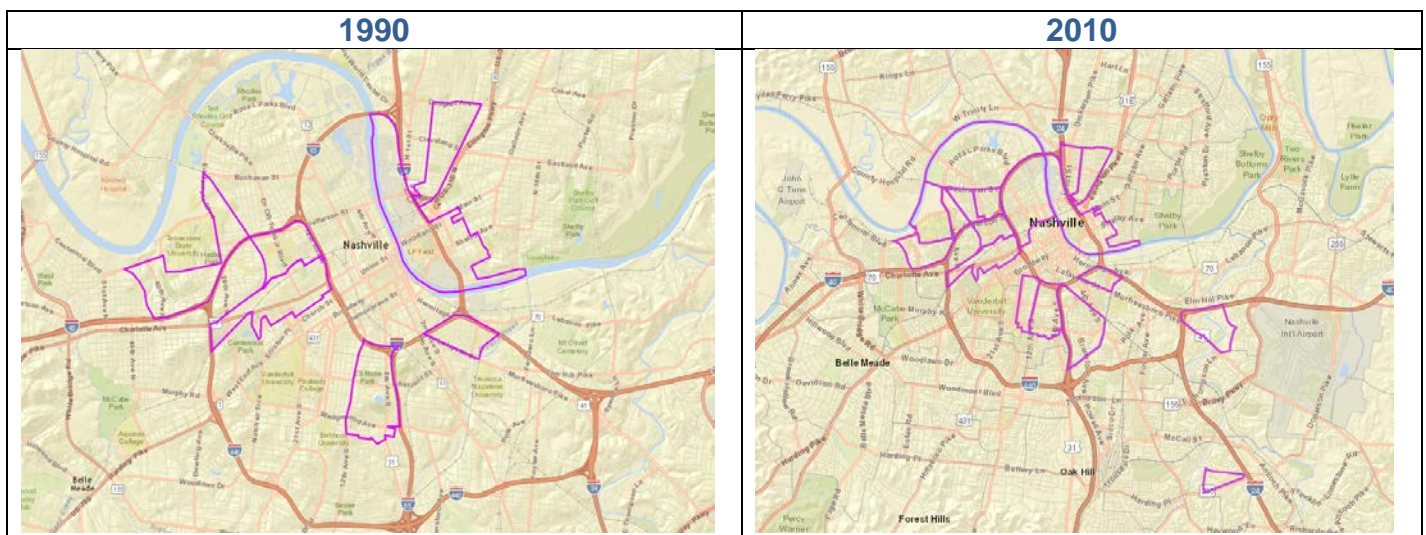
**HUD Table 4: R/ECAP Demographics**

	(Nashville-Davidson, TN CDBG, HOME, ESG) Jurisdiction			(Nashville-Davidson-- Murfreesboro--Franklin, TN) Region		
<b>R/ECAP Race/Ethnicity</b>		<b>#</b>	<b>%</b>		<b>#</b>	<b>%</b>
Total Population in R/ECAPs		40,147	-		40,147	-
White, Non-Hispanic		6,588	16.41%		6,588	16.41%
Black, Non-Hispanic		28,230	70.32%		28,230	70.32%
Hispanic		3,569	8.89%		3,569	8.89%
Asian or Pacific Islander, Non-Hispanic		656	1.63%		656	1.63%
Native American, Non-Hispanic		74	0.18%		74	0.18%
Other, Non-Hispanic		80	0.20%		80	0.20%
<b>R/ECAP Family Type</b>						
Total Families in R/ECAPs		8,585	-		8,585	-
Families with children		4,878	56.82%		4,878	56.82%
<b>R/ECAP National Origin</b>						
Total Population in R/ECAPs		40,147	-		40,147	-
#1 country of origin	Mexico	923	2.30%	Mexico	923	2.30%
#2 country of origin	Egypt	564	1.40%	Egypt	564	1.40%
#3 country of origin	El Salvador	478	1.19%	El Salvador	478	1.19%
#4 country of origin	Guatemala	330	0.82%	Guatemala	330	0.82%
#5 country of origin	Honduras	225	0.56%	Honduras	225	0.56%
#6 country of origin	Iraq	172	0.43%	Iraq	172	0.43%
#7 country of origin	Vietnam	121	0.30%	Vietnam	121	0.30%
#8 country of origin	Other Eastern Africa	117	0.29%	Other Eastern Africa	117	0.29%
#9 country of origin	Bosnia & Herzegovina	95	0.24%	Bosnia & Herzegovina	95	0.24%
#10 country of origin	Sudan	89	0.22%	Sudan	89	0.22%
<p>Note 1: 10 most populous groups at the jurisdiction level may not be the same as the 10 most populous at the Region level, and are thus labeled separately.</p> <p>Note 2: Data Sources: Decennial Census; ACS</p> <p><a href="http://www.hudexchange.info">Note 3: Refer to the Data Documentation for details (www.hudexchange.info).</a></p>						

**c. Describe how R/ECAPs have changed over time in the jurisdiction and region (since 1990).**

The number of R/ECAPs has at least doubled since 1990. The 1990, R/ECAPs are largely consistent with the location of MDHA's largest and oldest housing developments. In 2000 (map not shown), most of the North Nashville area had become R/ECAPs as it appears today. While the Glenclyff R/ECAP appeared in 1990 and 2010, it is not shown in 2000. The R/ECAP in Antioch does not appear until 2010, during the dramatic growth of the Hispanic population in Nashville.

**HUD Map 2: R/ECAP Trends**



**2. Additional Information**

**a. Beyond the HUD-provided data, provide additional relevant information, if any, about R/ECAPs in the jurisdiction and region affecting groups with other protected characteristics.**

Analysis regarding the location of publicly supported housing and R/ECAPs is provided in section C.1.b. This analysis includes publicly supported housing that primarily serves families with children, elderly persons, or persons with disabilities in relation to previously discussed segregated areas or R/ECAPs. An analysis of disability and access as it relates to R/ECAPs is provided in section D.2.b.

**b. The program participant may also describe other information relevant to its assessment of R/ECAPs, including activities such as place-based investments and geographic mobility options for protected class groups.**

In addition to the actions and strategies presented in sections B.2. and C.2.a, the Nashville Financial Empowerment Center provides free, professional financial counseling to Nashvillians citywide. The purpose is to help Davidson County residents reduce debt and build assets through free, one-on-one financial counseling incorporated into existing services offered in the city. Since opening in March, 2013, the centers have helped over 4,700 clients and held more than 9,000 individual counseling sessions. To date, FEC has helped clients reduce their debt by over **\$5 million** and helped them increase their savings by over **\$800,000**.

Nashville is a welcoming city where entrepreneurs find an integrated support network to launch and grow a business. The mission of the Mayor's Office of Economic and Community Development's (ECD) Small Business Development and Entrepreneurship program is to encourage local business development and job creation by connecting business owners to technical, financial and market resources. ECD works to provide competitive incentives for small businesses. ([Nashville.gov/Mayor's Office - Small Business Development and Entrepreneurship](http://Nashville.gov/Mayor's%20Office%20-%20Small%20Business%20Development%20and%20Entrepreneurship))

### 3. Contributing Factors of R/ECAPs

*Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of R/ECAPs.*

For residents, the same contributing factors applicable to segregation (section B.3.) apply to R/ECAPs:

- **Community opposition**
- **Displacement of residents due to economic pressures**
- **Lack of private investments in specific neighborhoods**
- **Lack of public investments in specific neighborhoods, including services or amenities**
- **Land use and zoning laws**
- **Location and type of affordable housing**
- **Loss of Affordable Housing**
- **Occupancy codes and restrictions**
- **Private discrimination**
- **Source of income discrimination**

In addition, residents mentioned two other contributing factors:

- **Deteriorated and abandoned properties**
  - There are old and dilapidated buildings in these areas.
  - In support of resident's comments, the mission of the Mayor's Office of Neighborhoods is to improve the quality of life in Nashville's neighborhoods through a more informed, active and involved citizenry and enhanced



governmental response to community needs. Old, deteriorated, neglected buildings are bad for the city as a whole; therefore the problem should be addressed.

- **Lack of community revitalization strategies**
  - Bordeaux residents would like to see a plan for development for the area that includes economic development and mixed income development.

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### *iii. Disparities in Access to Opportunity*

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## 1. Analysis

### a. Education

- i. **For the protected class groups HUD has provided data, describe any disparities in access to proficient schools in the jurisdiction and region.**

HUD's School Proficiency Index measures which neighborhoods have high-performing elementary schools nearby and which are near lower performing elementary schools. The values for the School Proficiency Index are determined by the performance of 4<sup>th</sup> grade students on state exams. HUD uses data for elementary schools because they are more likely to have neighborhood-based enrollment policies.

**HUD Table 12: Opportunity Indicators by Race/Ethnicity  
School Proficiency**

<b>(Nashville-Davidson, TN CDBG, HOME, ESG) Jurisdiction</b>	<b>School Proficiency Index</b>
<b>Total Population</b>	
White, Non-Hispanic	50.57
Black, Non-Hispanic	28.89
Hispanic	27.26
Asian or Pacific Islander, Non-Hispanic	47.00
Native American, Non-Hispanic	39.38
<b>Population below federal poverty line</b>	
White, Non-Hispanic	39.08
Black, Non-Hispanic	26.91
Hispanic	22.26
Asian or Pacific Islander, Non-Hispanic	41.11
Native American, Non-Hispanic	22.92
<b>(Nashville-Davidson--Murfreesboro--Franklin, TN) Region</b>	
<b>Total Population</b>	
White, Non-Hispanic	55.51
Black, Non-Hispanic	31.73
Hispanic	33.13

Asian or Pacific Islander, Non-Hispanic	51.60
Native American, Non-Hispanic	45.15
<b>Population below federal poverty line</b>	
White, Non-Hispanic	50.40
Black, Non-Hispanic	32.83
Hispanic	34.64
Asian or Pacific Islander, Non-Hispanic	49.40
Native American, Non-Hispanic	39.59

Among Nashville's total population, no group has access to schools with a proficiency index above 51. White residents have access to schools with the highest proficiency index at 50.57. Schools accessible to Hispanic residents have the lowest proficiency index with 27.26, with Black residents having the second lowest proficiency index of 28.89. The index stands at 39.38 for Native American residents and 47 for Asian-Pacific Islander residents.

Among Nashville's population living below the federal poverty line, the highest school proficiency index is 41.11 for Asian-Pacific Islander residents. Like the general population, the lowest index is found among schools accessible to Hispanic residents at 22.26. Native American residents do not fare much better with an index of 22.92. White residents have access to schools with a proficiency index of 39.08. The proficiency index falls in the middle for Black residents with 26.91.

Schools throughout the region perform better than schools in Nashville. Every group has access to higher performing schools than their city counterparts. Among the total population, White residents have access to schools with a proficiency index of 55.51. Asian-Pacific Islander residents can access schools with a proficiency index of 51.6. The index is 45.15 for Native American residents, 33.13 for Hispanic residents, and 31.73 for Black residents.

Among the region's population living below the federal poverty line, the highest proficiency index is 50.4 for schools accessible to White residents. The second highest index is 49.4 for Asian-Pacific Islander residents. The index is 39.59 for Native American residents, 34.64 for Hispanic residents, and 32.83 for Black residents.

Metro Nashville Public Schools (MNPS) developed Academic Performance Framework (APF) in an effort to combine student, teacher, and parent data into a comprehensive school performance measurement. A set of four main metrics evaluate the academic performance of schools. These metrics do not all carry equal weight, but MNPS considers them integral to the success or failure of schools. These metrics are as follows:

- **Metric 1: Academic Progress (50%)** - Academic progress is determined by the growth and long-term improvement of the entire student body. For assessment purposes, students are generally split into two groups: kindergarten to 8th grade, and 9th grade to 12th grade. The way MNPS' APF is used is regulated by

Tennessee state laws designed to ensure fairness in the way schools and their students are evaluated.

- **Metric 2: College Readiness (30%)** - These measurements are essentially annual snapshots showing what proportion of MNPS students meet high standards of achievement. For high school students, high standards of achievement are defined by certain scores on standardized tests such as the ACT and SAT, as well as the acquisition of enough school credits to graduate on time. For students younger than 8th grade, college readiness is calculated based on similar benchmarks for standardized tests to indicate progress.
- **Metric 3: School Culture (15%)** - This metric is intended to gauge the norms, expectations, values, beliefs, and traditions of each school. Data is based on surveys that are regularly administered to both students and educators, but the eventual goal is to include data from school parents as a part of this metric as well. MNPS utilizes a number of different surveys every year, the composite of which serves as a good litmus test for school culture overall.
- **Metric 4: Achievement Gap (5%)** - Every year, in each Metro school, MNPS takes steps to evaluate the difference in achievement levels between students who are considered disadvantaged and those who are not. The goal is to make sure that every student receives the attention they need in order to achieve academic success, regardless of where they come from. In general, areas of focus include race, disability, economic status, and level of proficiency in English.

Academic performance data for Metro Nashville Public Schools for K-8 is available at: <https://static1.squarespace.com/static/57752cbcd1758e541bdeef6b/t/57a2125fd482e9ab0a3a6efd/1470239328518/APF+All+Results+2013-2015+%28Board+-+Alphabetical%29.pdf>.

- ii. **For the protected class groups HUD has provided data, describe how the disparities in access to proficient schools relate to residential living patterns in the jurisdiction and region.**

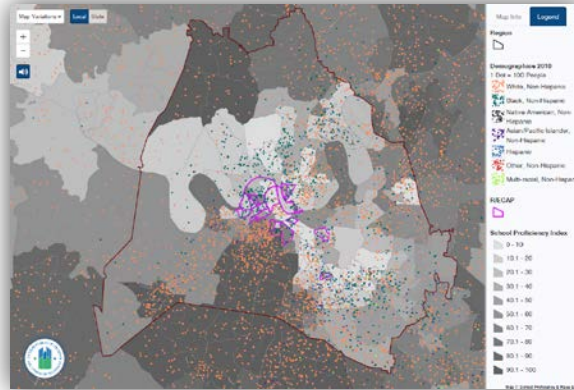
HUD's School Proficiency Index maps, which follow, show the proficiency of schools by degrees of shading, with darkest areas the most proficient. The following HUD maps show school proficiency in relation to Race/Ethnicity, National Origin, and Familial Status.

#### Race/Ethnicity

The most proficient schools are in White areas, while the least proficient schools are located in predominantly African-American neighborhoods and in R/ECAPs. However, proficient schools are located in the Wedgewood-Houston and Edgehill R/ECAPs.

## HUD Map 7: Demographics & School Proficiency

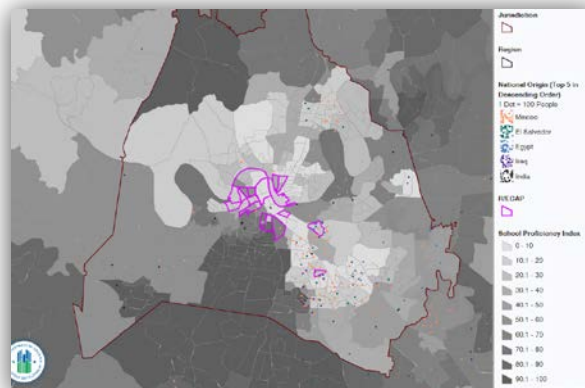
### Race/Ethnicity



### National Origin

Areas with the highest populations of foreign-born residents have some of the least proficient schools.

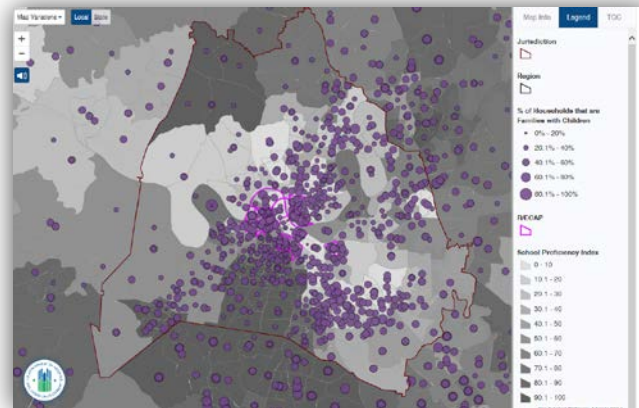
### National Origin



## Families with Children

Most families with children fall outside of areas with proficient schools.

### Families with Children



- iii. **Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss programs, policies, or funding mechanisms that affect disparities in access to proficient schools.**

There are more than 160 public schools in Metro Nashville, and families have the choice of sending children to neighborhood schools or to other schools in the district. Residents in R/ECAPs support community schools but recognize that their neighborhood schools do not meet the needs of their children. They also believe there is disparity in the resources and programs at their neighborhood schools than in other areas of the county. For residents in R/ECAPs, sending a child to an out of zone school is impeded by transportation issues.

Earlier in 2017, the 47-member Transition Team appointed by MNPS Director, Dr. Shawn Joseph, issued a report to assist Dr. Joseph in assessing the current state of the school district. The report identified six critical needs:

1. Ensure that all students graduate from high school college and career ready, to accelerate their learning (especially in Reading and Math), and to eliminate gaps in achievement between student groups;
2. Provide outstanding educational programs and improve choice offerings, program features, access, entry procedures, diversity, and advocacy;
3. Establish a vision for excellent education through the development and implementation of a new district strategic plan, accompanied by a system of



accountability to ensure that results are measured at regular intervals in both the central offices and schools, and to ensure unity and consistency of daily action throughout the system;

4. Provide clearly-defined procedures, updated structures, and state-of-the-art processes and systems in order to eliminate inefficient, and outdated practices that are not serving internal and external stakeholders well;
5. Create a welcoming culture throughout schools and offices and employ a wide range of technology and tools for effective and rapid stakeholder outreach to solicit and encourage diverse input; and
6. Communicate clearly the system's values and expectations, and market its best qualities aggressively.

The full report is available at:

[https://static1.squarespace.com/static/57752cbcd1758e541bdeef6b/t/589a57049f74568e064f9f17/1486509836711/TransitionTeamReport\\_FINAL.pdf](https://static1.squarespace.com/static/57752cbcd1758e541bdeef6b/t/589a57049f74568e064f9f17/1486509836711/TransitionTeamReport_FINAL.pdf).

## **b. Employment**

- i. For the protected class groups HUD has provided data, describe any disparities in access to jobs and labor markets by protected class groups in the jurisdiction and region.**

The Jobs Proximity Index quantifies the accessibility of a given residential neighborhood as a function of its distance to all job locations within the region, with distance to larger employment centers weighted more heavily. The index is ranked from 0-100, with the higher value, the better the access to employment opportunities for residents in neighborhoods.

The Labor Market Index provides a measure of the unemployment rate, labor-force participation rate, and percent of the population ages 25 and above with at least a bachelor's degree. The index is ranked from 0-100; the higher the value, the higher the labor force participation and human capital in a neighborhood.

**HUD Table 12 - Opportunity Indicators, by Race/Ethnicity**

<b>(Nashville-Davidson, TN CDBG, HOME, ESG) Jurisdiction</b>	<b>Labor Market Index</b>	<b>Jobs Proximity Index</b>
<b>Total Population</b>		
White, Non-Hispanic	68.59	51.06
Black, Non-Hispanic	43.81	48.84
Hispanic	50.52	49.37
Asian or Pacific Islander, Non-Hispanic	67.48	51.86
Native American, Non-Hispanic	55.73	51.47
<b>Population below federal poverty line</b>		
White, Non-Hispanic	56.72	53.29
Black, Non-Hispanic	34.09	50.33
Hispanic	44.25	48.88
Asian or Pacific Islander, Non-Hispanic	53.13	56.68
Native American, Non-Hispanic	54.90	31.93
<b>(Nashville-Davidson--Murfreesboro--Franklin, TN) Region</b>		
<b>Total Population</b>		
White, Non-Hispanic	59.09	52.26
Black, Non-Hispanic	45.15	49.76
Hispanic	50.96	49.86
Asian or Pacific Islander, Non-Hispanic	67.97	53.40
Native American, Non-Hispanic	52.84	52.41
<b>Population below federal poverty line</b>		
White, Non-Hispanic	47.90	49.78
Black, Non-Hispanic	35.77	51.22
Hispanic	44.12	50.72
Asian or Pacific Islander, Non-Hispanic	54.09	54.01
Native American, Non-Hispanic	45.62	43.38

### Jobs Proximity Index

- Nashville Total**

In Nashville, among all residents, three groups have roughly the same access to employment opportunities in their neighborhoods based on the jobs proximity index. These are Asian-Pacific Islander residents at 51.86, Native American residents at 51.47, and White residents at 51.06. The two lowest jobs proximity index scores belong to Hispanic residents at 49.37 and Black residents at 48.84.

- Nashville Residents Below Federal Poverty Line**

Among Nashville residents living below the federal poverty line, Asian-Pacific Islander residents have the highest access to employment opportunities with an index score of 56.68. Following them are White residents with a score of 53.29, Black residents with a score of 50.33, and Hispanic residents with a score of 48.88. The group with the lowest score is Native Americans at 31.93.

- **Region Total**

In the region, among all residents, Asian-Pacific Islander residents have the highest access to employment opportunities in their neighborhoods with an index score of 53.4. Native American and White residents follow closely with 52.41 and 52.26, respectively. Hispanic and Black residents have similar scores at 49.86 and 49.76, respectively.

- **Region Residents Below Federal Poverty Line**

Among residents in the region living below the federal poverty line, Asian-Pacific Islander residents have the greatest access to employment opportunities with a score of 54.01. Black residents have the second greatest access to employment opportunities at 51.22. Behind them are Hispanic residents with 50.72. The two groups to score below 50 are White and Native American residents. Whites have a jobs proximity index score of 49.78. Native Americans have the least access to employment opportunities with a score of 43.38.

#### Labor Market Index

- **Nashville Total**

Among all residents in Nashville, White and Asian-Pacific Islander residents have the greatest labor market engagement based on their labor market index scores. White residents have a score of 68.59, while Asian-Pacific Islander residents have a score of 67.48. The remaining groups of residents have much lower rates of labor market engagement. Native American residents score 55.73, and Hispanic residents score 50.52. Black residents have the lowest score of all groups at 43.81. That represents a difference of 24.78 points from the highest score.

- **Nashville Residents Below Federal Poverty Line**

Nashville residents living below the federal poverty line have lower labor market engagement rates than the overall population. White residents have the highest rate at 56.72. Native American residents follow closely with a score of 54.9. Behind them are Asian-Pacific Islander residents at 53.13 and Hispanic residents at 44.25. Black residents have the lowest labor market engagement rate at 34.09.

- **Region Total**

Among all residents in the region, Asian-Pacific Islanders have the highest rate of labor market engagement with a score of 67.97. Behind them are White and Native American residents with scores of 59.09 and 52.84, respectively. Hispanic residents have the second lowest engagement rate with a score of 50.96. Black residents have the lowest engagement rate with a score of 45.15.

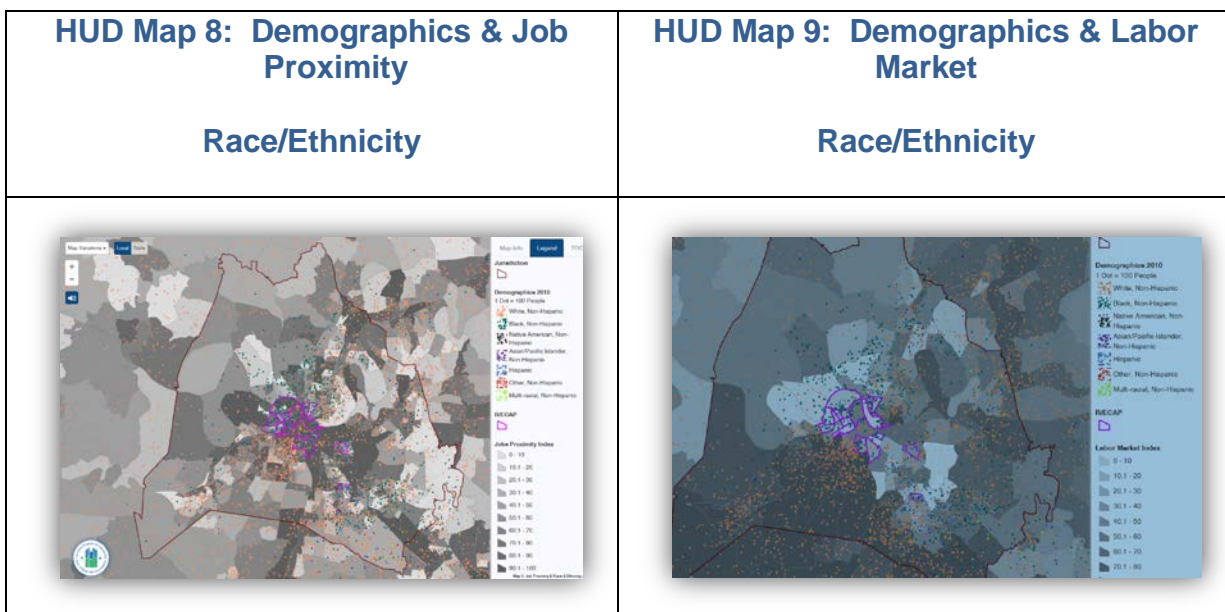
- **Region Residents Below Federal Poverty Line**

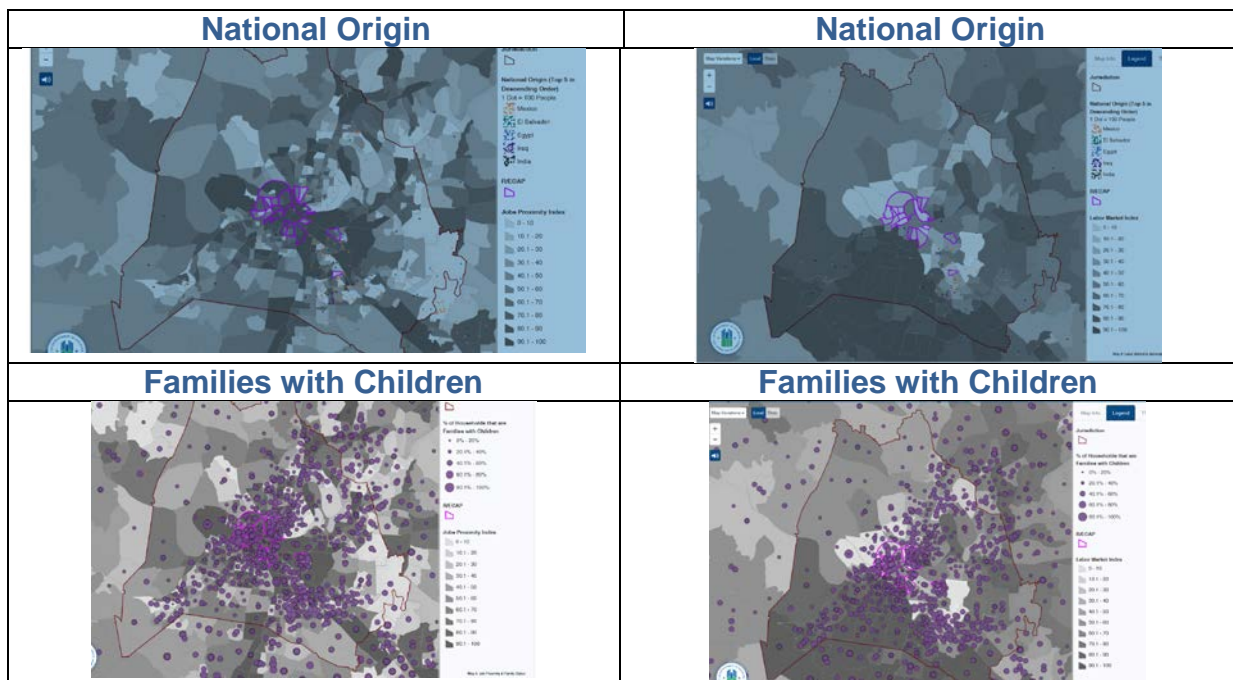
In the region, among residents living below the federal poverty line, labor market engagement rates are lower than they are for the overall region. Asian-Pacific Islander residents lead all groups with a rate of 54.09. With a moderate gap behind the top rate, White residents have the second highest engagement rate at 47.9. Native American and Hispanic residents follow with scores of 45.62 and 44.12, respectively. Black residents have the lowest engagement rate at 35.77, which mirrors their position for the city and region overall.

**ii. For the protected class groups HUD has provided data, describe how disparities in access to employment relate to residential living patterns in the jurisdiction and region.**

HUD Map 8 shows the relationship between job proximity and residency patterns as it relates to Race/Ethnicity, National Origin, and Familial Status, and HUD Map 9 shows the relationship between the labor market and residency patterns for the same protected classes.

In Nashville, highest jobs proximity is in or around downtown Nashville, including R/ECAPs. However, the R/ECAP in Antioch has a low jobs proximity index. Most foreign-born residents do not live in a high job proximity area. Although the job proximity index is high in R/ECAPs, the opposite is true for labor market numbers. The highest labor market is in the southern part of the county, adjacent to Williamson County, and in areas that are White. The labor market index is very low in all R/ECAPs and areas with concentrations of African-American residents.





- iii. **Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss whether there are programs, policies, or funding mechanisms that affect disparities in access to employment.**

The Mayor's Office and MDHA have several initiatives to help address disparities in access to employment. In addition to the actions described in section C.2.b, CDBG funds are being used to support a portion of the Opportunity NOW program, described below. In addition, MDHA will serve as an employer of summer interns.

### Opportunity NOW

The Metro Mayor has committed to employing 10,000 youth during the summer of 2017. Opportunity NOW is a coordinated initiative launched by Mayor Megan Barry to provide young people in Davidson County access to employment. In Nashville, fewer and fewer teenagers and young adults are working during the summers and after-school. At the same time, Nashville employers across various industries are concerned about the lack of "soft" skills among their youngest employees—skills most readily learned through actual work experience.

The initiative was created based on recommendations from the Mayor's Youth Violence Summit as a way to connect youth to opportunity and to hope. Opportunity NOW is designed to combat the growing gap in opportunity and will become the much needed system for delivering employment and employment-like opportunities for young people. Helping to implement the Mayor's initiative is the Nashville Career Advancement Center (NCAC), a division of the Mayor's Office and the city agency for workforce



development. NCAC coordinates closely with Mayor Barry and her Advisory Council for the program. The Opportunity NOW initiative is housed through an online portal that allows for youth voice and choice when applying for their first job.

- Year Round Opportunities

"Work Now" is year round, immediate, direct hire positions for young people aged 15 – 24 in businesses and organizations around Nashville.

- Summer Experiences

"Experience Work" is a team focused, project based summer program for youth aged 14 to 17 that promotes community engagement.

"High School Internship" is a six week summer internship program for youth aged 16 to 18 at local businesses and community organizations.

"Summer Plus" provides entry level positions for recent high school graduates with college going plans.

#### Nashville Construction Readiness Partnership (NCRP)

NCRP is a collaborative initiative of Mayor Megan Barry to assist citizens of Nashville in jump-starting their construction industry career. This initiative was created to ensure the citizens of Nashville have the access and skills needed to engage in Nashville's vibrant construction industry. The NCRP will develop and implement strategies that match employers with skilled Davidson County employees, and provide training opportunities for residents seeking to enter the industry for the first time.

### **c. Transportation**

#### **i. For the protected class groups HUD has provided data, describe any disparities in access to transportation related to costs and access to public transit in the jurisdiction and region.**

The Low Transportation Cost Index measures the cost of transportation and proximity to public transportation by neighborhood. The Transit Trips Index measures how often low-income families in a neighborhood use public transportation.

#### Low Transportation Cost Index

- **Nashville Total**

Among the total population in Nashville, each group has similar scores on the low transportation cost index. Hispanic residents have the lowest transportation cost with a score of 57.86. Black residents follow them with a score of 57.64. Asian-Pacific Islander residents come in third with 56.5. Native American residents have the second

highest cost with a score of 55.67. White residents have the highest cost with a score of 52.53.

- **Nashville Below Federal Poverty Line**

Among Nashville residents living below the federal poverty line, transportation costs are lower than they are for the overall population. Black residents have the lowest cost with a score of 63.81. Asian-Pacific Islanders residents have the second lowest cost with 63.61. Hispanic residents fall in the middle with a score 62.13. Native American residents have the second highest cost with 58.95. White residents have the highest cost at 58.59.

- **Region Total**

In the region, among all residents, transportation costs are higher overall than in the city. Black residents have the lowest cost with a score of 50.62. Hispanic residents have the second lowest cost with a score of 47.36. Asian-Pacific Islander residents fall in the middle with a score of 44.66. Native American residents have the second highest cost with a score of 36.5. White residents have the highest cost with a score of 33.66.

- **Region Below Federal Poverty Line**

Residents living below the federal poverty line in the region have higher transportation costs than their city counterparts. Black residents have the lowest cost with a score of 57.54. Asian-Pacific Islander residents have the second lowest cost with a score of 53.88. Hispanic residents fall in the middle with a score of 52.19. Native American residents have the second highest cost with a score of 50.66. White residents have the highest cost with a score of 37.42.

### Transit Index

- **Nashville Total**

As measured in transit trips, among all Nashville residents, different groups are likely to utilize public transit at roughly the same rates. Hispanic residents are most likely to ride public transit with a score of 47.95. Black residents follow closely behind them with a score of 47.69. Asian-Pacific Islander residents have about the same likelihood of riding public transit as the top two groups with a score of 47.3. Native American residents are the second least likely to utilize public transit with a score of 45.79. White residents are least likely to ride public transit with a score of 43.95.

- **Nashville Below Federal Poverty Line**

Nashville residents living below the federal poverty line are more likely to utilize public transit compared to the overall population. Black residents are the most likely to ride public transit with a score of 52.5. Asian-Pacific Islander residents are the second most

likely to use public transit with a similar score of 52.05. Hispanic residents closely follow them with a score of 51.03. Native American residents are the second least likely group to ride public transit with a score of 47.69. White residents are the least likely to utilize public transit with a score 47.51.

- **Region Total**

Among the overall population in the region, residents are less likely to utilize public transit than their city counterparts. Unlike the city, there are wider gaps in the likelihood of public transit utilization. Black residents are most likely to ride public transit with a score of 42.45. Hispanic residents are the second most likely group to ride transit with a score of 40.38. Asian-Pacific Islander residents are close behind them with 39.06. Native American residents are the second least likely to use transit with a score of 31.84. White residents are the least likely to ride public transit with a score of 29.95.

- **Region Below Federal Poverty Line**

Residents in the region living below the federal poverty line ride public transit at lower rates than their peers in the city. Black residents are most likely to use public transit with a score of 47.69. Asian-Pacific Islander residents are a close second with 46.91. Hispanic residents fall in the middle with a score of 43.64. Native American residents are the second least likely group to use public transit with a score of 42.22. White residents are the least likely with a score of 32.54.

**Table 12 - Opportunity Indicators, by Race/Ethnicity**

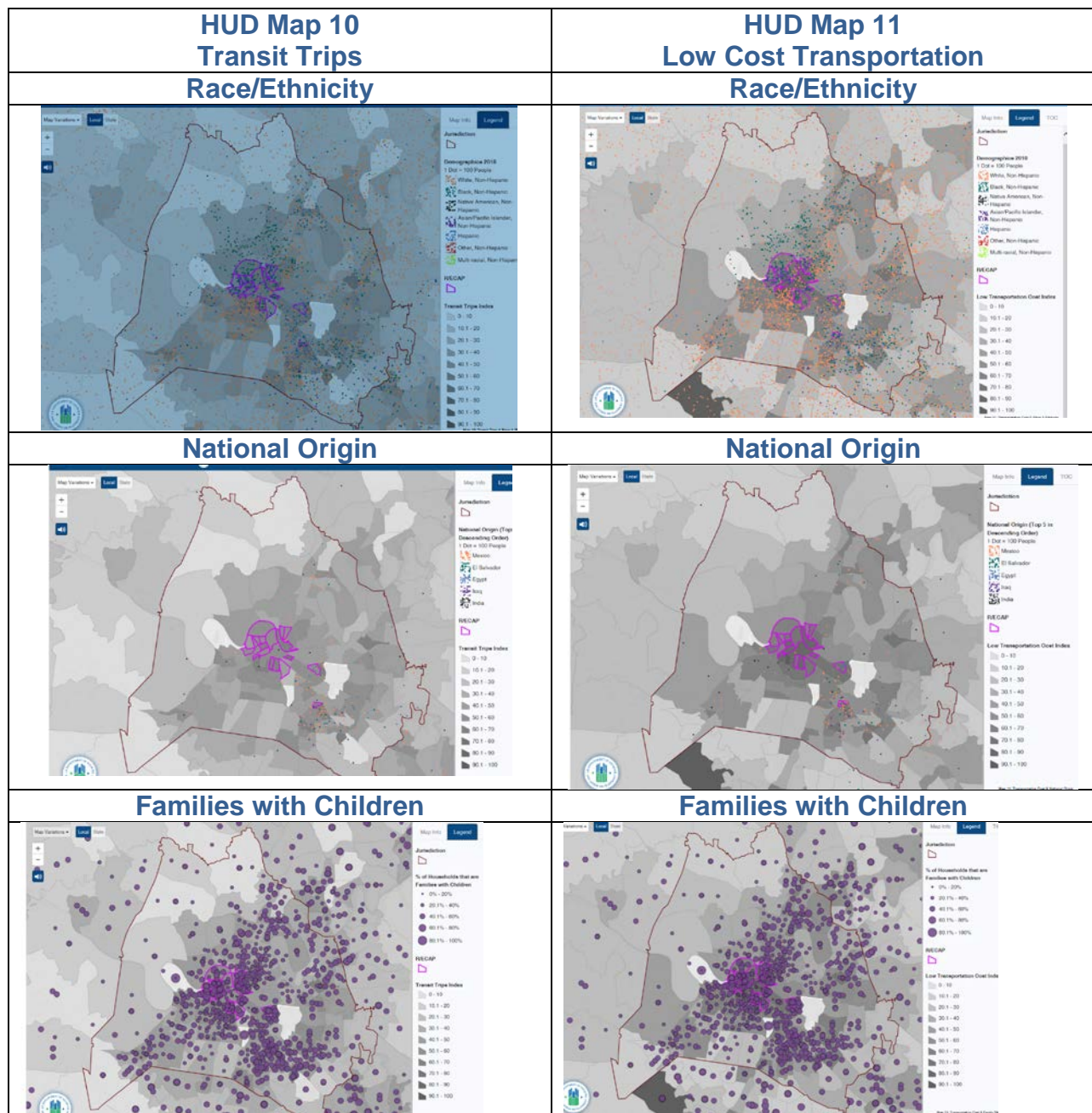
(Nashville-Davidson, TN CDBG, HOME, ESG) Jurisdiction	Transit Index	Low Transportation Cost Index
<b>Total Population</b>		
White, Non-Hispanic	43.95	52.53
Black, Non-Hispanic	47.69	57.64
Hispanic	47.95	57.86
Asian or Pacific Islander, Non-Hispanic	47.30	56.50
Native American, Non-Hispanic	45.79	55.67
<b>Population below federal poverty line</b>		
White, Non-Hispanic	47.51	58.59
Black, Non-Hispanic	52.50	63.81
Hispanic	51.03	62.13
Asian or Pacific Islander, Non-Hispanic	52.05	63.61
Native American, Non-Hispanic	47.69	58.95

<b>(Nashville-Davidson--Murfreesboro--Franklin, TN) Region</b>		
<b>Total Population</b>		
White, Non-Hispanic	29.95	33.66
Black, Non-Hispanic	42.45	50.62
Hispanic	40.38	47.36
Asian or Pacific Islander, Non-Hispanic	39.06	44.66
Native American, Non-Hispanic	31.84	36.50
<b>Population below federal poverty line</b>		
White, Non-Hispanic	32.54	37.42
Black, Non-Hispanic	47.69	57.54
Hispanic	43.64	52.19
Asian or Pacific Islander, Non-Hispanic	46.91	53.88
Native American, Non-Hispanic	42.22	50.66

- ii. **For the protected class groups HUD has provided data, describe how disparities in access to transportation related to residential living patterns in the jurisdiction and region.**

HUD map 10 shows values for the Low Cost Transportation Index with shading at the census tract level. HUD Map 11 shows values for the Transit Trips Index, also with shading at the census tract level. For both maps, the darker the shading in a tract indicates a better value for the index being used (i.e., darker shaded tracts would indicate lower transportation costs or better access to public transit for the households living in the census tract, and lighter shaded tracts would show higher transportation costs and less access to transit).

The HUD Transit Trip maps below show that while low-income use transit, they do not access it as often as possible. The Low Cost Transportation maps show that persons that have the best access to transit and low costs live in and around downtown.



- iii. Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss whether there are programs, policies, or funding mechanisms that affect disparities in access to transportation.

Next to affordable housing, transit is the most discussed subject in Nashville and was among those attending AFH meetings. This legislative session, the Tennessee General Assembly passed the Improve Act, which will allow local governments to create a mechanism for funding transportation projects. Also this legislative session, the General



Assembly authorized MDHA to create transit-oriented redevelopment districts. Very recently, the Mayor released “Moving the Music City,” Nashville’s 2017-2020 Transportation Action Agenda. Among the initiatives proposed are:

- Increase bus service on several key routes.
- Make it easier to walk to transit.
- Build a comprehensive mass transit system.

In 2015, the Nashville Metropolitan Transit Authority (MTA) and the Regional Transit Authority (RTA) engaged in a region-wide public discussion of the best strategies to improve regional mobility. From this came *nMotion* (2016), a comprehensive package of recommended transit improvements through the year 2040. These recommendations center on:

- Making service easier to use;
- Improving existing service;
- Improving access to transit;
- Making service more comfortable;
- Developing a network of regional transit centers;
- Expanding service to new areas; and
- Building a high capacity/rapid transit network.

The full report is available at: [http://nmotion2015.com/wp-content/uploads/2016/08/MTA\\_RecommendedPlan-Draft.pdf](http://nmotion2015.com/wp-content/uploads/2016/08/MTA_RecommendedPlan-Draft.pdf).

#### **d. Access to Low Poverty Neighborhoods**

- For the protected class groups HUD has provided data, describe any disparities in access to low poverty neighborhoods in the jurisdiction and region.**

HUD’s Low Poverty Index measures the concentration of poverty by neighborhood; it uses both poverty rates and public assistance receipt, in forms of cash-welfare, such as Temporary Assistance for Needy Families (TANF). The higher value on the index indicates a higher likelihood that a family may live in a low poverty neighborhood. A lower value on the Index indicates that households in a protected group have a higher likelihood of living in a neighborhood with higher concentrations of poverty.

**HUD Table 12 - Opportunity Indicators, by Race/Ethnicity**

<b>(Nashville-Davidson, TN CDBG, HOME, ESG) Jurisdiction</b>	<b>Low Poverty Index</b>
<b>Total Population</b>	
White, Non-Hispanic	55.96
Black, Non-Hispanic	29.90
Hispanic	32.16
Asian or Pacific Islander, Non-Hispanic	50.07

Native American, Non-Hispanic	42.07
<b>Population below federal poverty line</b>	
White, Non-Hispanic	39.46
Black, Non-Hispanic	17.86
Hispanic	22.17
Asian or Pacific Islander, Non-Hispanic	31.32
Native American, Non-Hispanic	45.56
<b>(Nashville-Davidson--Murfreesboro--Franklin, TN) Region</b>	
<b>Total Population</b>	
White, Non-Hispanic	58.35
Black, Non-Hispanic	35.11
Hispanic	39.56
Asian or Pacific Islander, Non-Hispanic	58.76
Native American, Non-Hispanic	51.00
<b>Population below federal poverty line</b>	
White, Non-Hispanic	43.17
Black, Non-Hispanic	22.17
Hispanic	28.52
Asian or Pacific Islander, Non-Hispanic	38.74
Native American, Non-Hispanic	37.52

- **Nashville Total**

In Nashville, among the total population, access to low poverty neighborhoods varies greatly between groups. White residents have the greatest access to low poverty neighborhoods with an index score of 55.96 (i.e., are most likely to live in a neighborhood that does not have a high concentration of poverty). Asian-Pacific Islander residents are not far behind with a score of 50.07. Native American residents fall in the middle with a score of 42.07. Hispanic residents have the second least access to low poverty neighborhoods with a score of 32.16. Black residents are least likely to have exposure to low poverty neighborhoods with a score of 29.99 (i.e., are most likely to live in a neighborhood with a higher concentration of poverty).

- **Nashville Below Federal Poverty Line**

Not surprisingly, among Nashville residents living below the federal poverty line, there is less likelihood they have access to low poverty neighborhoods. Native American residents are most likely to have access to low poverty neighborhoods with a score of 45.56. White residents are second most likely to have access to low poverty neighborhoods with a score of 39.46. Asian-Pacific Islander residents are in the middle of pack with a score of 31.32. Hispanic residents are the second least likely to have access to low poverty neighborhoods with a score of 22.17. Black residents have the least exposure to low poverty neighborhoods with a very low score of 17.86.

- **Region Total**

In the region, among all residents, every group is more likely to have access to low poverty neighborhoods than their Nashville counterparts. Asian-Pacific Islander residents have the most access to low poverty neighborhoods with a score of 58.76. White residents are a very close second with 58.35. Native American residents are third most likely to have access to low poverty neighborhoods with a score of 51. Hispanic residents are the second least likely to have access to low poverty neighborhoods with a score of 39.56. Black residents are least likely to have access to have access to low poverty neighborhoods with a score of 35.11.

- **Region Below Federal Poverty Line**

Like their Nashville counterparts, region residents living below the federal poverty line have less access to neighborhoods with low poverty. White residents have the greatest access to low poverty neighborhoods with an index score of 43.17. Asian-Pacific Islander residents have the second most access to low poverty neighborhoods with a score of 38.74. Native American residents are third with 37.52. Hispanic residents have the second least access to low poverty neighborhoods with 28.52. Black residents have the least access to low poverty neighborhoods with 22.17.

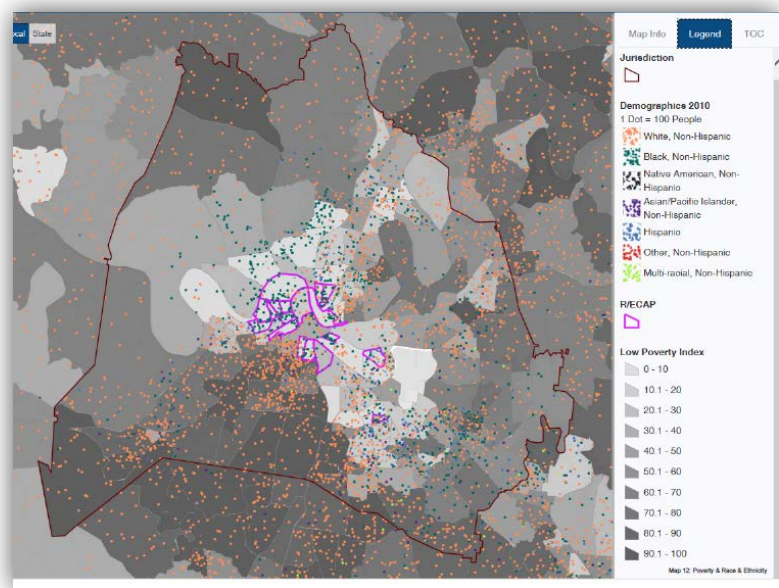
- ii. **For the protected class groups HUD has provided data, describe how disparities in access to low poverty neighborhoods relate to residential living patterns of those groups in the jurisdiction and region.**

HUD Map 12 shows residency patterns of racial/ethnic and national origin groups and families with children related to low poverty neighborhoods, with values for the Low Poverty Index with shading at the census tract level. Darker shading indicates a lower level of poverty in a census tract, and lighter shading in a tract indicates a higher concentration of poverty in that tract.

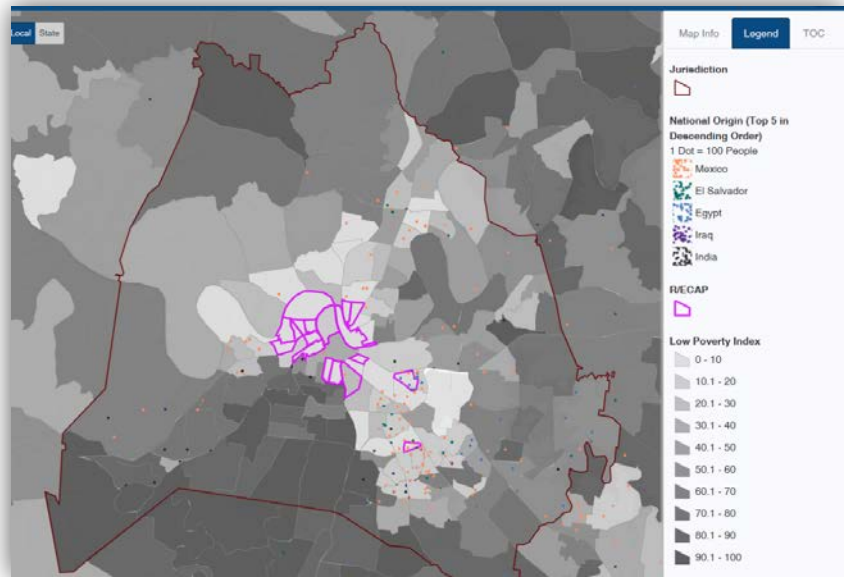
HUD Map 12 shows that, for the most part, areas with the lowest concentrations of poverty the south and southwest portions of Davidson County, and the areas with the highest concentrations of poverty are the R/ECAPs, Bordeaux, and areas in southeast Davidson County, down the Murfreesboro and Nolensville Road corridors. These high poverty areas have high concentrations of Black and foreign-born populations. Also, more families with children reside in higher poverty areas than in lower poverty areas.

HUD Map 12: Demographics & Low Poverty Neighborhoods

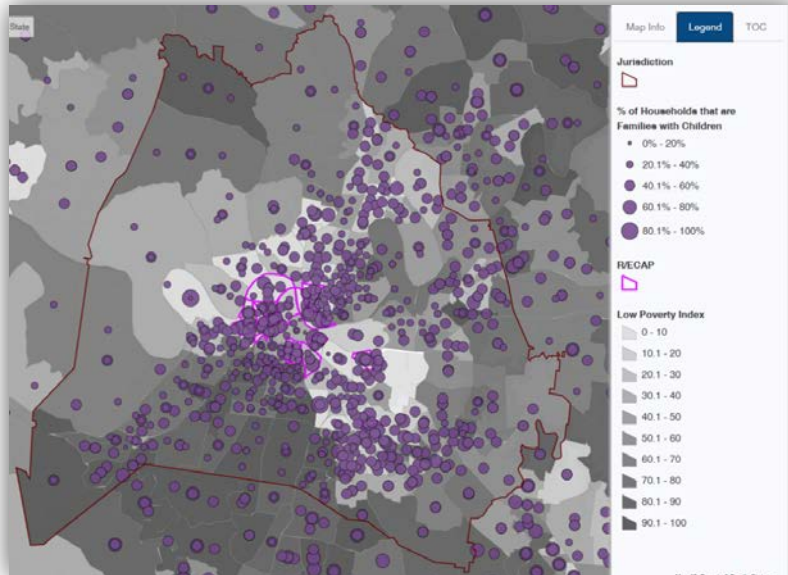
Race/Ethnicity



National Origin



## Families with Children

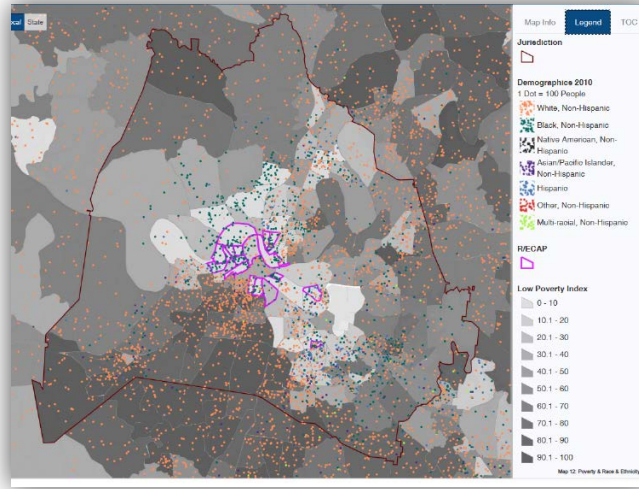


- iii. **Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss whether there are programs, policies, or funding mechanisms that affect disparities in access to low poverty neighborhoods.**

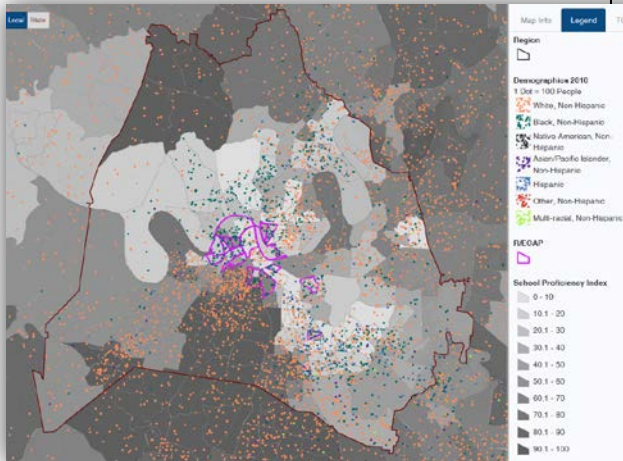
The following maps show a strong correlation between living in higher poverty areas and lower school performance, lower access to the labor market, greater reliance on public transportation, and a concentration of publicly supported housing. These areas are also segregated between White populations (better school performance, greater access to the labor market, less reliance on public transportation, less exposure to poverty, and little or no publicly supported housing) and Black and Foreign-born populations (lower school performance, less access to the labor market, greater reliance on public transportation, higher exposure to poverty, and concentrations of publicly supported housing).



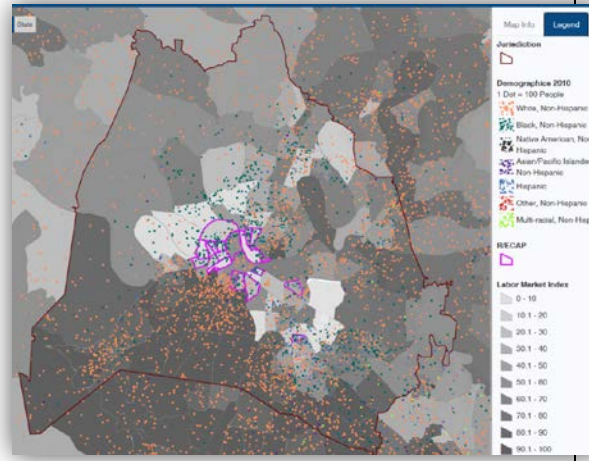
## Low Poverty Neighborhoods

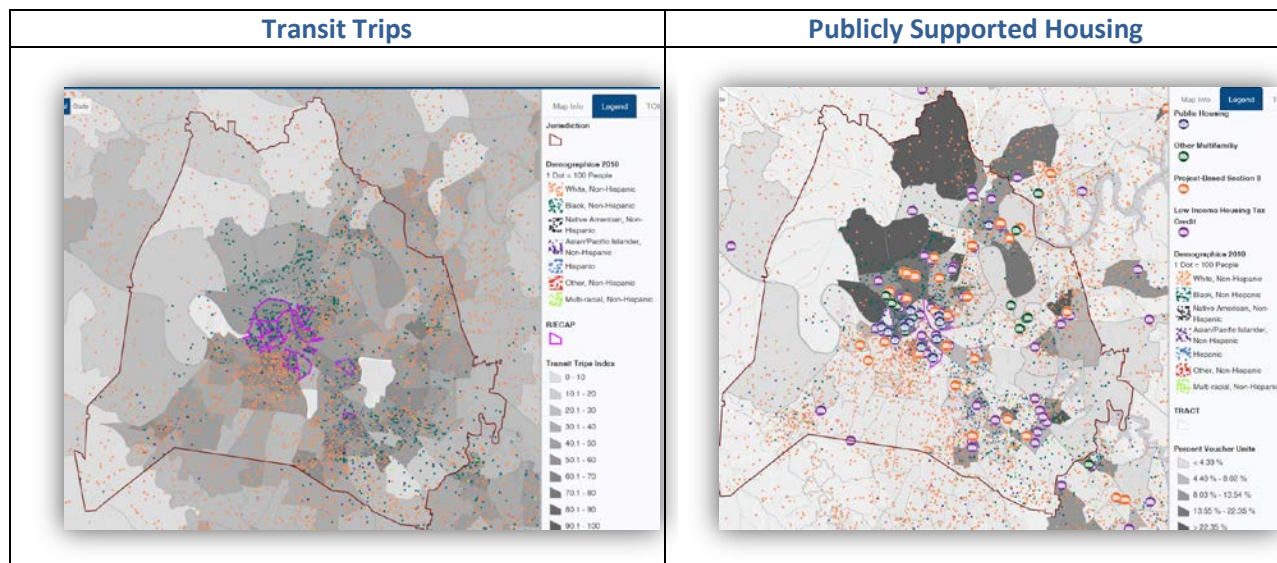


## School Proficiency



## Labor Market





In the *2016 Community Needs Evaluation*, Metro Social Services (MSS) dedicates much of its report to presenting data on poverty and discussing its impact. To dive deeper into the effects of poverty, MSS added two new sections in the 2016 report: Disparity and Toxic Stress and Poverty. The Disparity section shows disparity by demographics as it relates to income, educational attainment, homeownership, poverty, transportation, computer/Internet access. The section on Toxic Stress and Poverty discusses scientific evidence about the damaging effects of toxic stress caused by adverse childhood experiences. The report is available at: <http://www.nashville.gov/Portals/0/SiteContent/SocialServices/docs/cne/2016FullCNEfinal.pdf>.

Mayor Barry created the Office of Housing to assist in the building, funding, and preservation of affordable housing options, while supporting efforts to prevent displacement and create mixed-income communities in Metro Nashville. The Office seeks to increase housing affordability countywide using data-driven policy and innovative development tools including the Barnes Fund for Affordable Housing, Housing Incentives Pilot Program, general obligation bonds, tax abatement, nonprofit capacity building, the creation of a community land trust, and the donation and development of Metro-owned properties. The Office of Housing also facilitates partnerships and implements policies that provide housing options for persons experiencing homelessness to those looking to stabilize their families with affordable homeownership opportunities.

Many of the other policies and efforts addressed in preceding sections (schools, transportation, employment) and in section C. (Publicly Supported Housing Analysis) can be applied in this section as well.

## e. Access to Environmentally Healthy Neighborhoods

- i. For the protected class groups HUD has provided data, describe any disparities in access to environmentally healthy neighborhoods in the jurisdiction and region.

The HUD Environmental Health Index provided in the table below measures exposure based on EPA estimates of air quality carcinogenic, respiratory and neurological toxins by neighborhood. On a scale from 0 to 100, the higher the index, the less exposure residents have to environmental toxins; the lower the number, the higher the exposure.

<b>(Nashville-Davidson, TN CDBG, HOME, ESG) Jurisdiction</b>	<b>Environmental Health Index</b>
<b>Total Population</b>	
White, Non-Hispanic	29.78
Black, Non-Hispanic	24.72
Hispanic	24.62
Asian or Pacific Islander, Non-Hispanic	28.37
Native American, Non-Hispanic	26.64
<b>Population below federal poverty line</b>	
White, Non-Hispanic	23.99
Black, Non-Hispanic	19.61
Hispanic	21.47
Asian or Pacific Islander, Non-Hispanic	21.37
Native American, Non-Hispanic	15.55
<b>(Nashville-Davidson--Murfreesboro--Franklin, TN) Region</b>	
<b>Total Population</b>	
White, Non-Hispanic	46.89
Black, Non-Hispanic	30.35
Hispanic	33.13
Asian or Pacific Islander, Non-Hispanic	33.81
Native American, Non-Hispanic	44.08
<b>Population below federal poverty line</b>	
White, Non-Hispanic	45.89
Black, Non-Hispanic	25.26
Hispanic	31.76
Asian or Pacific Islander, Non-Hispanic	27.69
Native American, Non-Hispanic	34.46

### • Nashville Total

In Nashville, among the overall population, residents have similar access to environmentally healthy neighborhoods. White residents have the greatest access with an index score of 29.78. Asian-Pacific Islander residents have the second greatest access with 28.37. Native American residents fall in the middle with a score of 26.64.

Black and Hispanic residents have the least access to environmentally healthy neighborhoods with scores of 24.72 and 24.62, respectively.

- **Nashville Below Federal Poverty Line**

Nashville residents living below the federal poverty line are less likely to have access to environmentally healthy neighborhoods compared to the overall population. White residents have the greatest access with a score of 23.99. Hispanic and Asian-Pacific Islander residents have similar access with scores of 21.47 and 21.37, respectively. Black residents have the second least access with a low score of 19.61. Hispanic residents have the least access with a very low score of 15.55.

- **Region Total**

In the region, among all residents, there is greater access to environmentally healthy neighborhoods. White residents have the greatest access with a score of 46.89. Native American residents have the second greatest access with 44.08. Asian-Pacific Islander and Hispanic residents have similar access with scores of 33.81 and 33.13, respectively. Black residents have the least access with a 30.35.

- **Region Below Federal Poverty Line**

Residents in the region living below the federal poverty line have greater access to environmentally healthy neighborhoods than their city counterparts. White residents have the greatest access with a score of 45.89. Native American residents have the second greatest access with 34.46. Hispanic residents fall in the middle with a score of 31.76. Asian-Pacific Islander residents have the second least access with 27.69. Black residents have the least access with 25.26.

- ii. **For the protected class groups HUD has provided data, describe how disparities in access to environmentally healthy neighborhoods relate to residential living patterns in the jurisdiction and region.**

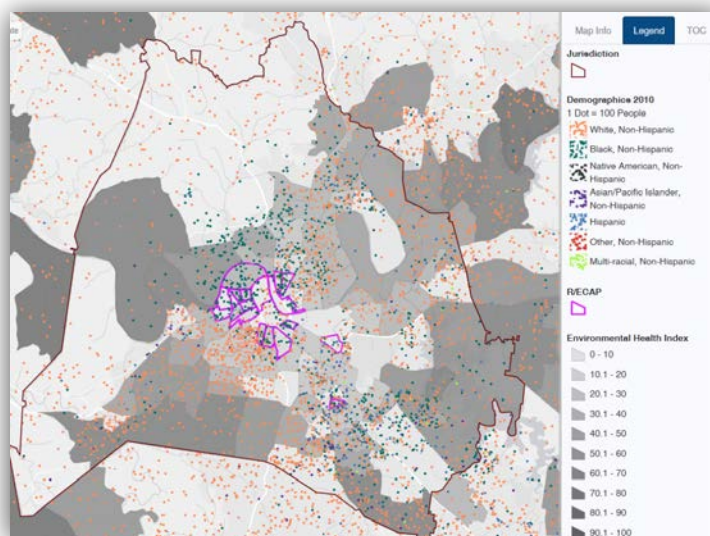
HUD Map 13 below shows the extent to which residents are exposed to environmental toxins in each census tract. The darker the shading, the less exposure; the lighter the shading, the greater exposure.

According to the map, most of Davidson County has high levels of exposures to environmental toxins. Areas with the lowest levels of exposure (darkest shading) are to the south – Oak Hill and Forest Hills; portions of Bellevue to the west; and the very southeast corner of the county. White residents are the predominant populations in these areas. Black and Foreign-born residents tend to live in areas with moderate to high levels of exposure. Families with children tend to live in areas with low to moderate exposure.

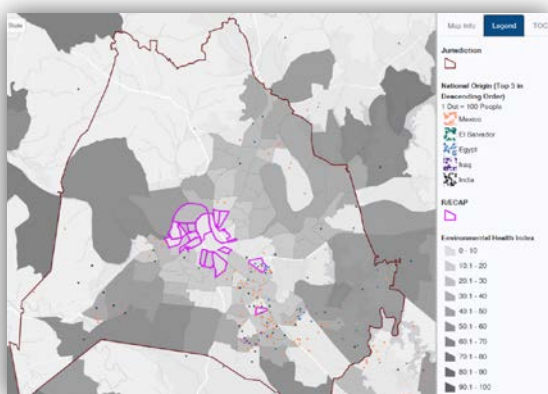


## HUD Map 13: Environmental Health

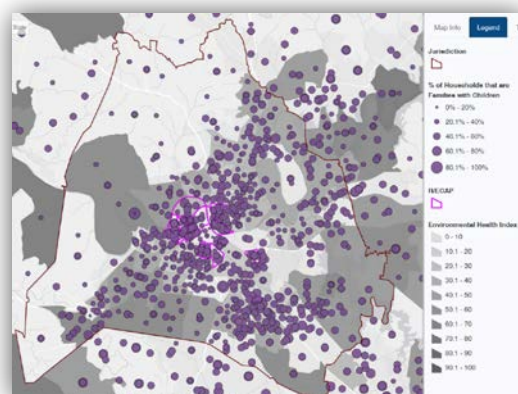
### Race/Ethnicity



### National Origin



### Families with Children



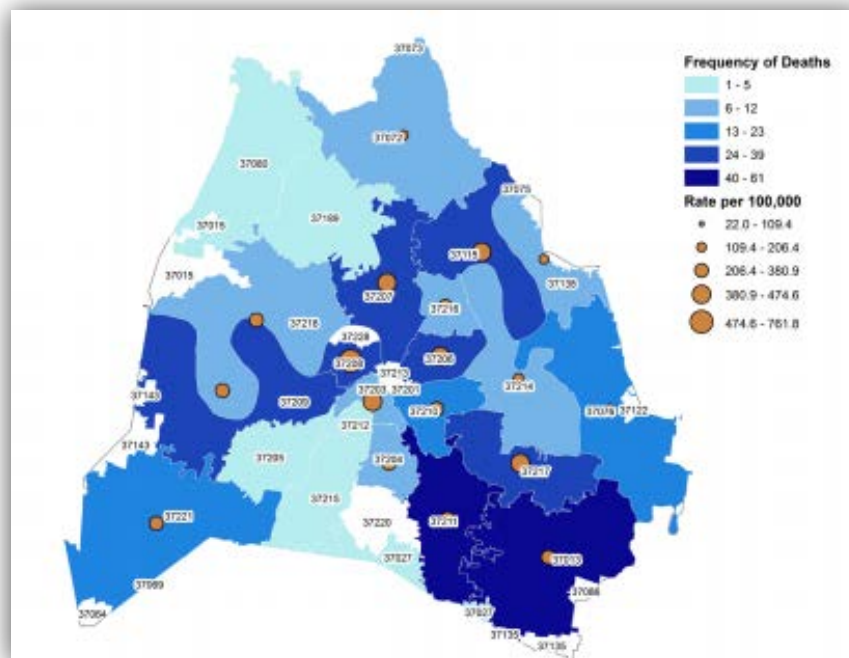
- iii. **Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss whether there are programs, policies, or funding mechanisms that affect disparities in access to environmentally healthy neighborhoods.**

In 2015, the Metro Public Health Department issued a Metro Health Equity Report and subsequent Health Equity Recommendations Supplemental Report. The purpose of these reports is to identify factors that contribute to health equities in Davidson County and develop recommendations for action to address health equity issues. The report discusses how where a person lives impacts on their health in short- and long-term



ways. One of the measures of health outcomes provided in the report was deaths of children by zip code from 2008-2012 (see map below). The Health Department noted that the zip codes that had the highest percentage of child deaths also have the highest percentage of families living below the poverty level. The report also analyzes risk factors and behaviors related to youth violence, sex trafficking, WIC mobile outreach, and breastfeeding rates.

**Child Deaths by Zip Code**  
*Source: 2015 Health Equity Report,  
 Metro Department of Public Health*



Citing a Bravemen 2003 study, the report includes an 8-step process for policy-oriented monitoring of health equity and its detriments:

- **Step 1:** Identify the social groups of a priority concern. In addition to reviewing the literature, consult representatives of all social sectors and civil society, including advocates for disadvantaged groups.
- **Step 2:** Identify general concerns and information needs relating to equity in health and its determinants. Again, in addition to the literature, consult representatives of all social sectors and civil society, including advocates for disadvantaged groups.
- **Step 3:** Identify sources of information on the groups and issues of concern. Consider both qualitative and quantitative information.

- **Step 4:** Identify indicators of (a) health status, (b) major determinants of health status apart from health care, and (c) healthcare (financing, resource allocation, utilization, and quality) that are particularly suitable for assessing gaps between more and less-advantaged social groups.
- **Step 5:** Describe current patterns of avoidable social inequalities in health and its determinants.
- **Step 6:** Describe trends in those patterns over time.
- **Step 7:** Generate an inclusive and public process of considering the policy implications of the patterns and trends. Include all the appropriate participants in this process (e.g. all relevant sectors, civil society, NGOs).
- **Step 8:** Develop and set in motion a strategic plan for implementation, monitoring, and research, considering political and technical obstacles, and including the full range of appropriate stakeholders in the planning process.
- **Repeat** the entire process from the beginning, incorporating new knowledge and awareness.

In a follow up to the 2015 Health Equity report, the Health Department issued Health Equity Recommendations for Nashville. The recommendations resulted from discussions that occurred during the 2015 Health Equity Summit hosted by the Metro Public Health Department. Recommendations center on the following equity priority areas:

- Community engagement
- Healthcare access
- Built environment
- Health services across the lifespan
- Health communication and education
- Culture change
- Economics
- Technology
- Human trafficking
- Educational system

Both reports are available at: <http://www.nashville.gov/Health-Department/Data-and-Publications/Community-Health-Status.aspx>.

#### **f. Patterns in Disparities in Access to Opportunity**

- i. For the protected class groups HUD has provided data, identify and discuss any overarching patterns of access to opportunity and**

**exposure to adverse community factors. Include how these patterns compare to patterns of segregation, integration, and R/ECAPs. Describe these patterns for the jurisdiction and region.**

In Metro Nashville, Black and Hispanic populations experience the greatest disparities in access to opportunities. As the opportunity indices show, Black residents have the greatest exposure to poverty, least access to the labor market as well as to jobs in their neighborhoods, and are the most reliant on public transportation. After the Hispanic population, Black residents have challenges accessing high performing schools and living in environmentally healthy neighborhoods. Hispanic populations have the least access to high performing schools and the greatest exposure to environmental toxins in their neighborhoods. Similar to Black residents, Hispanic residents have a greater exposure to poverty, experience more challenges in accessing the labor market and jobs in their neighborhoods, and rely on public transportation.

In the region, Black households experience the greatest disparities across all opportunity indicators: schools, employment, transportation, poverty, and environmental health.

These patterns are consistent with the Segregation and R/ECAP analyses in sections V.B.i. and ii., which show that Black and Hispanic populations live in segregated areas. In addition, Black residents are the predominant population living in R/ECAPs.

**ii. Based on the opportunity indicators assessed above, identify areas that experience: (a) high access; and (b) low access across multiple indicators.**

As discussed previously, high poverty areas also have lower school performance, lower access to the labor market and jobs, greater reliance on public transportation, and a concentration of publicly supported housing. These same areas show a segregation of Black or Foreign-born residents. Low poverty areas have higher performing schools, higher access to the labor market and jobs, less dependence on public transportation, and little to no publicly supported housing. These are areas with mostly or nearly all White populations.

## **2. Additional Information**

**a. Beyond the HUD-provided data, provide additional relevant information, if any, about disparities in access to opportunity in the jurisdiction and region affecting groups with other protected characteristics.**

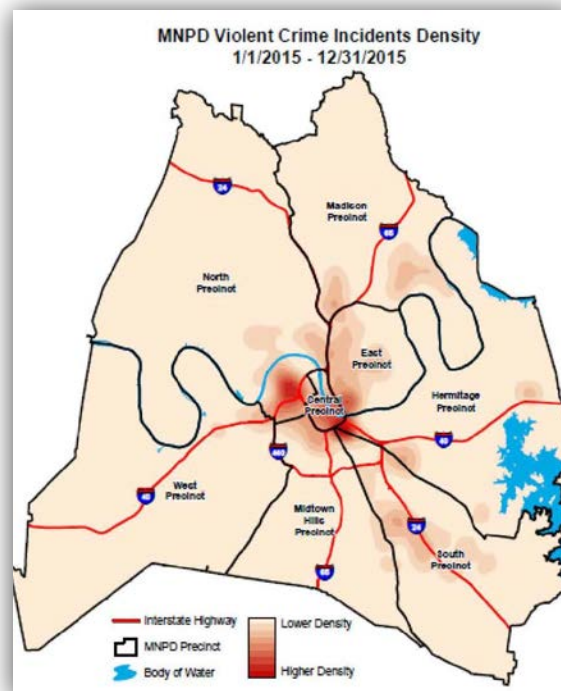
In addition to the disparities to opportunity analyzed in the preceding sections, two issues related to poverty arose during the community engagement process: crime and food deserts.

### Crime

Residents living in public housing and those in high poverty areas frequently commented on being afraid to leave their homes for fear of becoming a victim of a violent crime. As reported in the *2016 Community Needs Evaluation*, data from the Metro Nashville Police Department (MNPd) on service calls, homicides, gunshot, injuries, street robberies, aggravated assaults, etc., for calendar year 2015 show that people who are black were both suspects and victims at a rate higher than the percent they represent in Davidson County. The data further shows that 65.7% of suspects were black and 49.9% were white for violent crimes during 2015. The map below shows violent crime incidents density for the period January 1, 2015 thru December 31, 2015. (Pages 58-59) As can be seen in the map, the higher density areas correlate to areas with high concentrations of poverty.

### **MNPd Violent Crime Incidents Density 1/1/2015-12/31/2015**

*From 2016 Community Needs Evaluation, Metro Social Services*



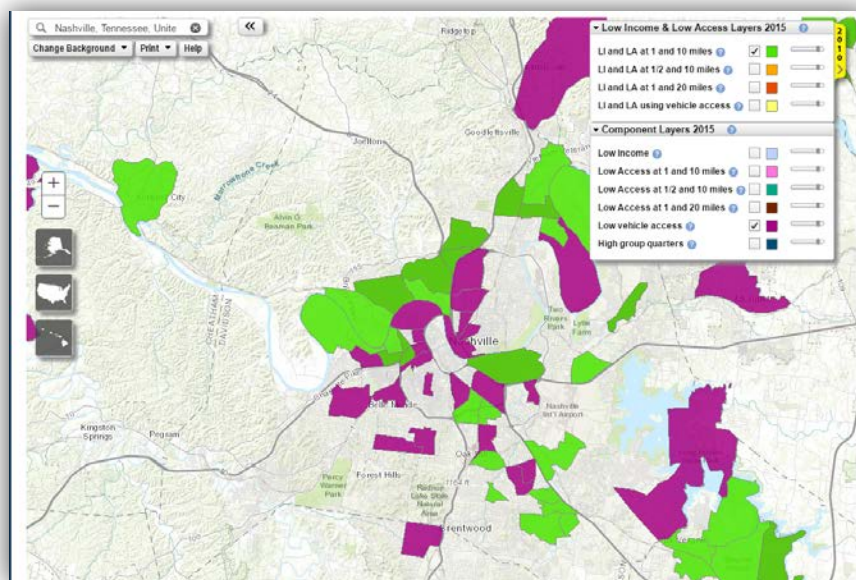
### **Food Deserts**

One of the priorities listed in the Consolidated Plan is to “increase access to healthy food choices”. Many low-income neighborhoods of Metro Nashville can be categorized as “food deserts” - area where residents have limited access to healthy and affordable food. A food desert is defined by the USDA as a low-income census tract (tract with a poverty rate equal to or greater than 20%, or a median family income that is 80% or less of the metropolitan area’s median family income) in which a substantial proportion of the population has low access (at least 500 people or 33% of the population is located more than one mile (urban) or 10 miles (rural) from the nearest

supermarket or large grocery store). Concentrated poverty and the percent of minority populations are critical factors in determining low access. Also, areas with lower vehicle availability and public transportation access have a higher likelihood of being in a food desert.

The USDA map below shows low income and low access layers at 1 and 10 miles (green areas) and low vehicle access (purple areas). Low vehicle access areas are census tracts in which more than 100 households have no access to a vehicle and are more than ½ mile from the nearest supermarket. Many of the areas shown in the map below correlate to the high poverty areas identified in this section.

### USDA Food Desert Map 2015



- b. The program participant may also describe other information relevant to its assessment of disparities in access to opportunity, including any activities aimed at improving access to opportunities for areas that may lack such access, or in promoting access to opportunity (e.g., proficient schools, employment opportunities, and transportation).

Initiatives aimed at addressing segregation and poverty are also aimed at increasing access to opportunity for residents in these areas. These initiatives include:

#### CDBG Place-Based Strategy

In developing the 2013-2018 Consolidated Plan, MDHA received significant input regarding the uneven distribution of resources in areas with high concentrations of poverty, which are also have high concentrations of minority populations. As a result,



MDHA implemented a place-based strategy for community development to target the use of CDBG funds for certain activities. Census tracts in which MDHA Public Housing is located are within the Tier 2 targeted and funding has been used to assist with planning efforts, business technical assistance, neighborhood facility projects, and infrastructure improvements.

### Barnes Housing Trust Fund

In 2013, the [Barnes Housing Trust Fund](#) was created as Metro Nashville's first housing trust fund to leverage affordable housing developments countywide. Named after Reverend Bill Barnes, a longstanding advocate for affordable housing and the deconcentration of poverty, the Barnes Fund provides funding to nonprofit developers to build affordable housing. In July 2016, Mayor Barry increased the funding of the Barnes Fund to \$40M over the course of four years, with an annual commitment of \$10M from the Mayor—the largest investment to date. The Barnes Fund has invested over \$14 million in affordable housing using Barnes Fund and leveraged over \$50M with federal and private funding sources, funding more than 500 housing units. The Barnes Fund currently has one dedicated funding source through fees from Short Term Rental permits. To date, the Barnes Fund has received over \$600,000 in dedicated funding.

### Housing Incentive Pilot Program

In 2016, Metro launched the Housing Incentives Pilot Program (HIPP) designed to motivate private developers to incorporate affordable and workforce units into their apartment, condo, or housing developments. This voluntary program encourages mixed-income housing, primarily in the urban core and along major pikes and transportation corridors.

### MDHA Redevelopment (“Envision”) Plans

In March 2013, MDHA embarked on a planning process dubbed “Envision Cayce” to create a master plan for revitalizing Cayce public housing. The subsequent plan calls for creating a vibrant mixed-use, mixed-income neighborhood in an area that currently has a high minority concentration and a high concentration of poverty, has few amenities, and is isolated from the rest of the vibrant East Nashville community. The mixed-income component includes a commitment to 1-for-1 replacement of all 716 units of public housing, as well as new workforce and market rate housing, fully integrated within building. Information about Envision Cayce is available at: <http://www.nashville-mdha.org/?p=1616>.

MDHA hopes to replicate this plan throughout its portfolio of older public housing stock. In 2016, MDHA was awarded a \$500,000 Choice Neighborhoods Planning grant to support “Envision Napier and Sudekum”. Planning efforts will focus on transforming distressed public housing as well as the surrounding neighborhoods of concentrated poverty into viable mixed-income areas. More information is available at: <http://www.nashville-mdha.org/choice-neighborhoods/>.

### Promise Zone Designation

On June 6, 2016, Nashville was named a Promise Zone community. The Nashville Promise Zone boundary is 46-square miles and includes North Nashville and several of MDHA's public housing properties, which are highly segregated, as well as part of the Nolensville Road corridor where the Hispanic population is concentrated. A close partnership between MDHA, the Mayor's Office and with six (6) Implementation Partners will work to address the goals of creating jobs; increasing economic activity; improving educational opportunities; reducing violent crime; increasing access to affordable housing; and improving community infrastructure. One of the benefits of receiving Promise Zone designation is the ability of organizations that serve residents in the Promise Zone to receive preference points in certain federal funding opportunities announced by Promise Zone partner agencies.

### Transit Oriented Development

Transit Oriented Development (TOD) is one of the initiatives in Nashville's Housing Toolkit included in the *Housing Nashville* report. TOD is focused on using public investment for mixed-income, mixed-use development along Nashville's highest capacity corridors – Gallatin Pike, Murfreesboro Road, Nolensville Pike, Charlotte Pike, and the Northwest Corridor.

## **3. Contributing Factors of Disparities in Access to Opportunity**

*Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disparities in access to opportunity.*

The following contributing factors were identified during the community engagement process.

- **Access to financial services**
  - It is difficult for some African-Americans to get a loan due to credit issues.
  - There needs to be more financial counseling and homebuyer programs.

- **Availability, type, frequency, and reliability of public transportation**
  - Bus rides takes too long, bus schedules do not accommodate work/school schedule; the cost is high for a person with a limited income; the location of bus stops are not convenient.
- **Lack of private investments in specific neighborhoods**
  - As mentioned in previous sections, communities would like to attract more and different investments and would like incentives for area businesses.
- **Lack of public investments in specific neighborhoods, including services or amenities**
  - Residents in Bordeaux, North Nashville, and Antioch echoed the need for sidewalks; and it was reported that the storm water and sewer systems in North Nashville are outdated.
  - “Only about half of Nashville’s roads currently have sidewalks, and no one knows where to find the money to cover the rest of them. The sidewalk situation even became a point of contention in last year’s mayoral campaign.” *(Martin, Rachel. “Walking in Nashville.” City Lab. 6, Jan. 2017)*
- **Lending discrimination**
  - African-Americans and Hispanics report getting a higher interest on a loan than someone who is White.
  - 2015 HMDA shows that African-Americans are denied more for home loans than any other race.
- **Location and type of affordable housing**
  - Affordable housing tends to be located in segregated, high poverty areas that are not near high proficiency schools or do not have good access to the labor market. Affordable housing also tends to be located in high crime areas and food deserts.
  - Affordable tends to be in unsafe areas where there is no healthy food or access to public transportation.
- **Location of environmental health hazards**
  - Bordeaux residents feel the area has been treated as a dumping ground as evidence by the location of a landfill, drug court, and prisons in the area.

- **Location of proficient schools and school assignment policies**

- Residents feel that schools in R/ECAPs do not meet the needs of the children from the neighborhood who attend them and transportation is a barrier to attending out-of-zone schools.

- **Loss of affordable housing**

- Apartments are being sold from under tenants, who are only given 30 days' notice to move. Many tenants affected are immigrants who do not understand the notices.
- Formerly affordable apartments are being sold or chose to remodel and increase rents.

- **Private discrimination**

- Landlords use arrest records and criminal affidavits, rather than criminal history, when considering an application. Many landlords do not make their criminal history policy publicly available and it is applied arbitrarily.

- **Source of income discrimination**

- Landlords charge exorbitant rents when the tenant does not have a social security card.
- Landlords charge extra fees when the tenant has a voucher or ask the tenant how s/he will pay for utilities.
- Landlords refuse voucher-holders who have no income in favor of a voucher-holder with an income.

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#### *iv. Disproportionate Housing Needs*

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### **1. Analysis**

- a. **Which protected class groups (by race/ethnicity and familial status) experience higher rates of housing problems (cost burden, overcrowding, or substandard housing) when compared to other groups for the jurisdiction and region? Which groups also experience higher rates of severe housing cost burdens when compared to other groups?**

For the purpose of the AFH, “disproportionate housing need” is a condition in which there are significant disparities in the proportion of members of a protected class experiencing a category of housing needs when compared to the proportion of members in of any other relevant groups or the total population experiencing that category of housing need in Nashville or the MSA. HUD measures disproportionate housing need by several types of housing conditions – cost burden, overcrowding, and substandard housing problems:

Housing Condition	Description
Cost Burden and Severe Cost Burden	<p>Cost burden is the fraction of a household's total gross income spent on housing costs. There are two levels of cost burden:</p> <ol style="list-style-type: none"> <li>1) "Cost Burden" counts the households for which housing cost burden is greater than 30% of their income; and</li> <li>2) "Severe Cost Burden" counts the number of households paying 50% or more of their income for housing. For renters, housing costs include rent paid by the tenant plus utilities. For owners, housing costs include mortgage payment, taxes, insurance, and utilities.</li> </ol>
Overcrowding	Households having more than 1.01 to 1.5 persons per room are considered overcrowded and those having more than 1.51 persons per room are considered severely overcrowded. The person per room analysis excludes bathrooms, porches, foyers, halls, or half-rooms.
Substandard Housing Problems	<p>There are two types of substandard housing problems:</p> <ul style="list-style-type: none"> <li>• Households without hot and cold piped water, a flush toilet and a bathtub or shower; and</li> <li>• Households with kitchen facilities that lack a sink with piped water, a range or stove, or a refrigerator.</li> </ul>

HUD Table 9 provides demographic data for households with disproportionate housing needs, including severe housing problems, for both Nashville and the MSA.

**HUD Table 9: Demographics of Households with Disproportionate Housing Needs**

Disproportionate Housing Needs	(Nashville-Davidson, TN CDBG, HOME, ESG) Jurisdiction			(Nashville-Davidson--Murfreesboro--Franklin, TN) Region		
Households experiencing any of 4 housing problems	# with problems	# households	% with problems	# with problems	# households	% with problems
Race/Ethnicity						
White, Non-Hispanic	49,950	162,900	30.66%	142,842	501,681	28.47%
Black, Non-Hispanic	30,514	67,058	45.50%	42,920	95,536	44.93%
Hispanic	9,579	16,662	57.49%	15,692	28,290	55.47%
Asian or Pacific Islander, Non-Hispanic	2,008	6,339	31.68%	3,752	11,922	31.47%
Native American, Non-Hispanic	231	484	47.73%	495	1,260	39.29%
Other, Non-Hispanic	1,326	3,333	39.78%	2,794	7,095	39.38%
<i>Total</i>	<i>93,608</i>	<i>256,750</i>	<i>36.46%</i>	<i>208,505</i>	<i>645,755</i>	<i>32.29%</i>



Disproportionate Housing Needs	(Nashville-Davidson, TN CDBG, HOME, ESG) Jurisdiction			(Nashville-Davidson--Murfreesboro--Franklin, TN) Region		
Households experiencing any of 4 housing problems	# with problems	# households	% with problems	# with problems	# households	% with problems
Household Type and Size						
Family households, <5 people	36,755	125,352	29.32%	95,264	372,106	25.60%
Family households, 5+ people	9,871	17,617	56.03%	23,609	55,250	42.73%
Non-family households	46,980	113,777	41.29%	89,600	218,360	41.03%
Households experiencing any of 4 Severe Housing Problems	# with severe problems	# households	% with severe problems	# with severe problems	# households	% with severe problems
Race/Ethnicity						
White, Non-Hispanic	22,607	162,900	13.88%	63,580	501,681	12.67%
Black, Non-Hispanic	16,404	67,058	24.46%	22,349	95,536	23.39%
Hispanic	5,624	16,662	33.75%	8,993	28,290	31.79%
Asian or Pacific Islander, Non-Hispanic	1,198	6,339	18.90%	2,199	11,922	18.44%
Native American, Non-Hispanic	159	484	32.85%	314	1,260	24.92%
Other, Non-Hispanic	651	3,333	19.53%	1,494	7,095	21.06%
<b>Total</b>	<b>46,703</b>	<b>256,750</b>	<b>18.19%</b>	<b>98,920</b>	<b>645,755</b>	<b>15.32%</b>
Note 1: The four housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 30%. The four severe housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 50%. Note 2: All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households. Note 3: Data Sources: CHAS Note 4: Refer to the Data Documentation for details ( <a href="http://www.hudexchange.info">www.hudexchange.info</a> ).						

## - Housing Problems

Overall, 36.5% of Nashville households and 32.3% of regional households have housing problems. In Nashville and the region, Hispanics have the highest percentage of households with housing problems. About 57.5% of households in Nashville and 55.5% in the region have problems. In Nashville, Hispanics are followed by Native American households (47.7%) and Black households (45.5%). In the region, they are followed by Black households (44.9%) and households of 'other' races and ethnicities (39.4%). In Nashville, among the remaining groups, housing problems affect 39.8% of 'other' households, 31.7% of Asian-Pacific Islander households, and 30.7% of White households. In the region, among the remaining groups, housing problems affect 39.3% of Native American households, 31.5% of Asian-Pacific Islander households, and 28.5% of White households.

In Nashville, family households with 5 or more people experience the highest percentage of housing problems with 56%. Among non-family households, 41.3% experience housing problems. Family households with less than 5 people experience the lowest percentage of housing problems at 29.3%. In the region, family households

with 5 or more people experience the highest percentage of housing problems with 42.7%. Among non-family households, 41% experience housing problems. Family households with less than 5 people experience the lowest percentage of housing problems at 25.6%.

## Severe Housing Cost Burden

HUD Table 10 provides demographics (race/ethnicity and family size) for households with severe cost burden.

**HUD Table 10: Demographics of Households with Severe Housing Cost Burden**

Households with Severe Housing Cost Burden	(Nashville-Davidson, TN CDBG, HOME, ESG) Jurisdiction			(Nashville-Davidson--Murfreesboro--Franklin, TN) Region		
Race/Ethnicity	# with severe cost burden	# households	% with severe cost burden	# with severe cost burden	# households	% with severe cost burden
White, Non-Hispanic	20,719	162,900	12.72%	56,200	501,681	11.20%
Black, Non-Hispanic	15,008	67,058	22.38%	20,454	95,536	21.41%
Hispanic	3,713	16,662	22.28%	5,774	28,290	20.41%
Asian or Pacific Islander, Non-Hispanic	708	6,339	11.17%	1,510	11,922	12.67%
Native American, Non-Hispanic	159	484	32.85%	259	1,260	20.56%
Other, Non-Hispanic	600	3,333	18.00%	1,329	7,095	18.73%
<b>Total</b>	<b>40,907</b>	<b>256,750</b>	<b>15.93%</b>	<b>85,526</b>	<b>645,755</b>	<b>13.24%</b>
<b>Household Type and Size</b>						
Family households, <5 people	16,147	125,352	12.88%	37,589	372,106	10.10%
Family households, 5+ people	3,007	17,617	17.07%	6,322	55,250	11.44%
Non-family households	21,763	113,777	19.13%	41,595	218,360	19.05%
Note 1: Severe housing cost burden is defined as greater than 50% of income.						
Note 2: All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households.						
Note 3: The # households is the denominator for the % with problems, and may differ from the # households for the table on severe housing problems.						
Note 4: Data Sources: CHAS						
<a href="http://www.hudexchange.info">Note 5: Refer to the Data Documentation for details (www.hudexchange.info).</a>						

Overall, 15.9% of households in Nashville and 13.2% of households in the region experience severe housing cost burden. With the smallest number of total households, Native Americans experience the highest percentage of severe housing cost burden with 32.9% in the city and 20.6% in the region. Following Native Americans, Black and Hispanic households experience severe housing cost burden at similar rates. In the city, 22.4% of Black households and 22.3% of Hispanic households experience severe cost burden. In the region, the rate is 21.4% for Black households and 20.4% for Hispanic households. Households of 'other' races and ethnicities experience severe housing cost burden at rates of 18% in Nashville and 18.7% in the region. The two groups with

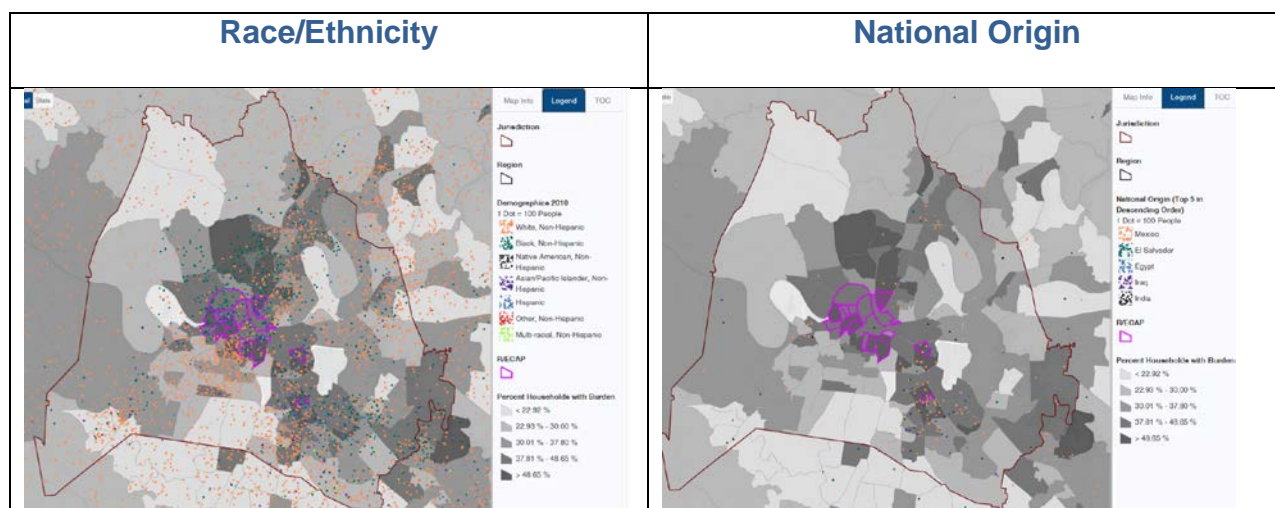
the lowest rates of severe housing cost burden are White households and Asian-Pacific Islander households. In the city, the rates are 12.7% for Whites and 11.2% for Asian-Pacific Islanders. In the region, the rates are 12.7% for Asian-Pacific Islanders and 11.2% for Whites.

In Nashville, non-family households experience the greatest rate of severe cost burden at 19.1%, followed by family households with 5 or more people at 17.1% and family households with less than 5 people at 12.9%. In the region, the rates are 19.1% for non-family households, 11.4% for households with 5 or more people, and 10.1% for households with less than 5 people.

**b. Which areas in the jurisdiction and region experience the greatest housing burdens? Which of these areas align with segregated areas, integrated areas, or R/ECAPs and what are the predominant race/ethnicity or national origin groups in such areas?**

HUD Map 6 shows housing needs (all 4 housing problems) by census tracts by race/ethnicity and national origin. The darker the shading, the greater the percentage of housing needs in the census tracts.

**HUD Table 6: Housing Needs**



In Nashville, the areas with the greatest housing burdens are concentrated toward the center of the city, extending to the northeast and southeast sections of town – in areas previously shown to be segregated. Although the R/ECAPs have high percentages of housing burdens, these issues can be found throughout the city. Black residents are the predominant group living in areas with the greatest housing burdens. There are also pockets of Hispanic residents living in these areas. However, in looking at the location of Foreign-born residents, most live in areas with higher housing burdens. Although White residents have a predominant presence in some of these areas, as a whole, they are more likely to live in areas with lower rates of housing burdens.

In the region, there are small concentrated areas of housing burdens in several towns: Murfreesboro, Columbia, Dickson, Lebanon, Hendersonville, Portland, Hartsville, and Franklin. In the region, residents originally from Mexico are the predominant Foreign-born group in areas with the greatest housing burdens. (The HUD map for the region did not produce information on race/ethnicity.)

**c. Compare the needs of families with children for housing units with two, and three or more bedrooms with the available existing housing stock in each category of publicly supported housing for the jurisdiction and region.**

As discussed previously and shown in HUD Table 6, over half (56.03%) of the families with households consisting of 5 or more people in Nashville experience housing problems. Regarding the availability of publicly supported housing for families with children, HUD Table 8 shows families with children are more likely to live in Public Housing than in Project-Based Section 8 and are not likely to live in Other Multifamily housing. This is likely due to unit sizes in each of the publicly supported housing categories, with Other Multifamily only having 7 2-bedroom units and no 3+-bedroom units, as the excerpt from HUD Table 11 below shows.

**HUD Table 8 Excerpt: Families with Children by Certain Publicly Supported Housing Category**

Development Name	# of Units	% of HH with Children
<b>Public Housing (by AMP)</b>		
Andrew Jackson Courts	560	46%
Levy Place	125	80%
Historic Preston Taylor Apartments	274	75%
Edgehill Apartments	555	49%
Cayce Place	713	73%
Vine Hill Apartments	136	69%
Napier Place	818	72%
Neighborhood Housing	368	70%
Edgefield Manor	220	0%
Ceatham Place	537	50%
Preston Taylor Neighborhood Housing	40	90%
Madison Towers	210	0%
Parthenon Towers	502	1%
Vine Hill Towers	147	N/a

Project-Based Section 8		
Berkshire Place Apartments	195	69%
Charter Village Apartments	220	67%
Chippington Towers	1	N/a
Chippington Towers	417	N/a
Cumberland View Towers	150	N/a
CWA Apartments I	176	96%
CWA Apartments II	76	74%
Dandridge Towers	153	N/a
Fallbrook Apartments	244	73%
Haynes Garden Apartments	208	64%
Hickory Forest	90	47%
Hickory Hollow Towers	154	1%
John L. Glenn Residential Center	47	2%
Kelly Miller Smith Towers	107	1%
Knollcrest Apartments	197	55%
Margaret Robertson Apartments	100	78%
Metrocenter Teachers Apartments	174	N/a
Nashville Christian Towers	175	N/a
Old Hickory Towers	210	N/a
Overlook Ridge	199	76%
Phyllis Wheatley Apartments	81	1%
Radnor Towers	190	1%
Richland Hills Apartments	138	62%
Riverwood Tower Apartments	117	N/a
Shelby Hills Apartments	56	45%
Skyview Apartments	88	68%
The Park At Richards Road Apartment	147	50%
Trevecca Towers East	323	N/a
Trevecca Towers II	162	N/a
Trinity Hills Village Apartments	100	72%
Villa Maria Manor	213	N/a
Wedgewood Towers Apartments	117	1%
Other Multifamily		
15th Ave Baptist Village Manor	25	N/a
Peggy Ann Alsup Arbors	30	N/a
Disciples Village – Nashville	51	N/a
Heartland Christian Tower	57	N/a
Project Independence	18	N/a
Hagy Commons	16	N/a
Spruce Street House Of Hope	15	N/a
Haleys Park	14	N/a
Home Mission Haven	29	N/a
Spruce Street Golden Manor	23	4%
Nashville VOA Living Center	12	N/a
Note 1: Percentages may not add to 100 due to rounding error.		
Note 2: Data Sources: APSH Note 3: Refer to the Data Documentation for details ( <a href="http://www.hudexchange.info">www.hudexchange.info</a> ).		



**HUD Table 11 Excerpt: Publicly Supported Housing by Program Category & Units by Number of Bedrooms**

	Households in 0-1 Bedroom Units	Households in 2 Bedroom Units	Households in 3+ Bedroom Units
Housing Type	#	#	#
Public Housing	2,091	1,735	1,259
Project-Based Section 8	3,121	1,167	495
Other Multifamily	250	7	0
HCV Program	1,458	2,635	2,326
Note 1: Data Sources: APSH			
Note 2: Refer to the Data Documentation for details ( <a href="http://www.hudexchange.info">www.hudexchange.info</a> ).			

MDHA Table C.2 in section V.C.1.a.iii highlights the need for units to accommodate families.

**MDHA Table C.2: Waitlist for Public Housing Family & Contemporary Properties**

			# of Bedrooms				
	# Number of Units	Total on Waitlist	1	2	3	4	5
Family Properties							
Andrew Jackson Courts	374	4423	2296	1135	992		
Cayce	716	1175	578	314	208	51	24
Cheatham Place	314	4422	2325	1128	969		
Cumberland View	226	3325	1786	818	528	148	45
Edgehill Apartments	380	3622	2018	824	526	171	83
Napier	378	2271	1397	361	513		
Neighborhood Housing	346	5965	2727	1714	1133	391	
Sudekum	443	2100		1312	638	107	43
Contemporary Properties							
Historic Preston Taylor	274	4462	1747	1448	898	268	101
John Henry Hale	188	5091	1956	1655	1061	419	
Parkway Terrace	125	3647	1477	1191	694	209	76
Vine Hill Apartments	136	4276	1676	1394	1206		

**d. Describe the differences in rates of renter and owner occupied housing by race/ethnicity in the jurisdiction and region.**

Data in HUD Table 16 provides homeownership and rental rates by race/ethnicity for both Nashville and the MSA.

**HUD Table 16: Homeownership and Rental Rates by Race/Ethnicity**

	(Nashville-Davidson, TN CDBG, HOME, ESG) Jurisdiction				(Nashville-Davidson--Murfreesboro-- Franklin, TN) Region			
	Homeowners		Renters		Homeowners		Renters	
Race/Ethnicity	#	%	#	%	#	%	#	%
White, Non-Hispanic	103,280	73.56%	59,565	51.19%	364,950	85.01%	136,705	63.16%
Black, Non-Hispanic	26,634	18.97%	40,429	34.75%	41,540	9.68%	53,990	24.95%
Hispanic	5,183	3.69%	11,464	9.85%	10,985	2.56%	17,295	7.99%
Asian or Pacific Islander, Non-Hispanic	3,523	2.51%	2,864	2.46%	7,169	1.67%	4,767	2.20%
Native American, Non- Hispanic	266	0.19%	215	0.18%	840	0.20%	414	0.19%
Other, Non-Hispanic	1,472	1.05%	1,850	1.59%	3,835	0.89%	3,239	1.50%
Total Household Units	140,395	-	116,355	-	429,325	-	216,430	-
Note 1: Data presented are numbers of households, not individuals.								
Note 2: Data Sources: CHAS								
<a href="http://www.hudexchange.info">Note 3: Refer to the Data Documentation for details (www.hudexchange.info).</a>								

- **Nashville**

- *Renters by Race and Ethnicity*

Not surprisingly, the proportions of renters are the opposite of the proportions of owners when compared to their overall proportion of the population. For instance, White households are overrepresented as owners compared to their overall population, whereas they are underrepresented as renters (51.2% of renters vs. 63.4% of all households). For Black households, it is 34.8% of renters compared to 26.1% of all households. For Hispanic households, it is 9.9% of renters compared to 6.5% of all households. The remaining groups rent at a rate about even with their proportion of the overall population.

- *Homeowners by Race and Ethnicity*

In Nashville, White households own homes at a greater proportion than their proportion of the overall population (73.6% of owners vs. 63.4% of all households). Black and Hispanic households own homes at a lower proportion than their proportion of the overall population. For Blacks, it is 19% of owners compared to 26.1% of all households. For Hispanics, it is 3.7% of owners compared to 6.5% of all households. The remaining groups own homes at a rate about even with their proportion of the overall population.

- **Region**

- *Renters by Race and Ethnicity*

Like the city, the proportions of renters are the opposite of the proportions of owners when compared to their overall proportion of the population. For instance, White

households are overrepresented as owners compared to their overall population, whereas they are underrepresented as renters (63.2% of renters vs. 77.7% of all households). For Black households, it is 25% of renters compared to 14.8% of all households. For Hispanic households, it is 8% of renters compared to 4.4% of all households. The remaining groups rent at roughly the same rate as their proportion of the overall population.

- *Homeowners by Race and Ethnicity*

In the region, the proportion of White households that own homes is higher than their overall proportion of the population (85% of owners vs. 77.7% of all households). Black and Hispanic households own homes at a lower proportion than their proportion of the overall population. For Blacks, it is 9.7% of owners compared to 14.8% of all households. For Hispanics, it is 2.6% of owners compared to 4.4% of all households. The remaining groups own homes at a rate about even with their proportion of the overall population.

### Home Mortgage Loan Disclosure Act (HMDA)

2015 HMDA data for the Nashville-Davidson MSA on the following pages shows that for FHA, FSA/RHS, and VA home purchase loans (1-4 family and manufactured homes), Native Hawaiian/Other Pacific Islander households had the highest total percentage of loans originated (88.24%), followed by White households (76.51%). Black households had the lowest total percentage of loans originated (68.52%) and the highest total percentage of applications denied (15.97%). American Indian/Alaskan Native households had the lowest total percentage of applications denied (7.50%), followed by White households (9.30%).

For conventional loans, White households had the highest total percentage of loans originated (77.51%) and the lowest total percentage of applications denied (7.42%). Black households had the lowest total percentage of loans originated (65.54%) and the highest percentage of applications denied (17.57%).

White households submitted more total applications for conventional loans (23,273) than for FHA, FSA/RHS, and VA home purchase loans (13,053); Black households submitted twice as applications for FHA, FSA/RHS, and VA home purchase loans (1,922) than for conventional loans (888).

HMDA data tables are presented in section V.B.i.1.d.

## **2. Additional Information**

- a. **Beyond the HUD-provided data, provide additional relevant information, if any, about disproportionate housing needs in the jurisdiction and region affecting groups with other protected characteristics.**

## Gender

HMDA data shows that for all racial/ethnic groups except White (American Indian/Alaskan Native, Asian, Black, and Native Hawaiian/Other Pacific Islander), males were more likely to have conventional home purchase loans originated than females. For White, the percentage of conventional loan originations for females was slightly higher (76.89%) than for males (76.33%). For conventional loans in 2015, males were more likely to apply (8,387 applications) than females (5,538 applications).

For FHA, FSA/RHS, and VA home purchase loans, males are also more likely to apply (6,164) than are females (4,164). However, females had the higher percentages of loans originated for all ethnic groups except for Native Hawaiian/Other Pacific Islander.

MDHA data provided below and discussed in section V.C. shows that although females represent a little over half of Metro's population, they are the predominate gender in Public Housing and HCV programs. As discussed in section V.C, most Public Housing properties are located in R/ECAPs.

**MDHA Table C.1: Gender of Residents in Public Housing & HCV Programs**

Gender	Region		Metro Nashville		Public Housing		HCV Program	
	#	%	#	%	#	%	#	%
Male	816,628	48.87%	303,540	48.44%	4,128	37.28%	5,596	35.99%
Female	854,262	51.13%	323,141	51.56%	6,944	62.71%	9,951	64.01%
Note 1: Data for Region and Metro Nashville is from HUD Table 1.								
Note 2: Percentages for Public Housing do not equal 100% due to some residents not reporting gender.								

## Disability and Age

Housing needs related to disability (including chronic homelessness) and age are discussed in section V.D.

## Religion and LEP

As discussed previously, the path to homeownership for some Muslims is particularly difficult because Sharia Law prohibits the collection of interest, which in effect, bars them from applying for conventional loans. In addition, lending information and documents are usually only in English, making lending programs inaccessible to persons with limited English proficiency.

During the community engagement process, stakeholders and members of the public reported that some landlords take advantage of immigrants, particularly those that are undocumented by charging exorbitant rents, especially when a tenant does not have a social security card. It was also reported that landlords fail to make repairs and allow these tenants to live in deplorable conditions. Stakeholders commented that most immigrants will not report these issues for fear of losing their housing.

- b. The program participant may also describe other information relevant to its assessment of disproportionate housing needs. For PHAs, such information may include a PHA's overriding housing needs analysis.**

### Affordable Housing, in General

A lot of discussion has occurred in recent years regarding housing affordability in Nashville. In developing NashvilleNext (adopted 2015), Metro's 25-year General Plan, the Metro Planning Department included a section on housing. See: [http://www.nashville.gov/Portals/0/SiteContent/Planning/docs/NashvilleNext/PlanVolumes/next-volume2-Elements\\_Housing.pdf](http://www.nashville.gov/Portals/0/SiteContent/Planning/docs/NashvilleNext/PlanVolumes/next-volume2-Elements_Housing.pdf). This was followed up by Mayor Barry's Housing Priorities and Action Plan for 2016-2017 which focuses on how Metro can fund, build, preserve, and retain affordable housing options through a variety of tools. See: <http://www.nashville.gov/Portals/0/SiteContent/MayorsOffice/AffordableHousing/docs/HousingPrioritiesandActionPlan.pdf>. Most recently, the Mayor's Office released *Housing Nashville* (May 2017), which is intended to be a working document outlining the housing needs goals, and available tools for ensuring that all Nashvillians have access to housing options. In addition, the report will be used to inform housing policies, guide funding priorities, and provide direction for the city, its partners, and stakeholders for the next 10 years. The report includes a housing gaps analysis by income and tenure from 2000-2015, a projection of housing needs for 2015-2025, and a description of tools to address housing needs (some of which have been discussed throughout the AFH). (<http://www.nashville.gov/Portals/0/SiteContent/MayorsOffice/AffordableHousing/Housing%20Nashville%20FINAL.pdf>).

The following are policy recommendations included in the report:

1. Increase housing choices that are affordable, available, and accessible to all new and existing Nashvillians, maintaining economic and social diversity.
2. Create tools that encourage context sensitive developments in Nashville's neighborhoods.
3. Reduce the negative effects of gentrification in Nashville's growing residential markets.
4. Empower residents and neighborhoods to take part in policy and decision-making.
5. Utilize an equitable development approach rooted in values of equity and diversity, holistic strategy, racial equity, and community partnerships.
6. Emphasize green building and energy efficiency in housing construction and rehabilitation.



In addition, the report lists the following as priority populations:

- Extremely low-income households (0-30% of median household income)
- Seniors (over age 62)
- New Americans
- Persons with disabilities
- Veterans
- Youth
- Persons formerly incarcerated.

### PHA Housing Needs

MDHA is the public housing authority (PHA) in Nashville, and its portfolio includes public housing and housing choice voucher programs. An analysis of these programs in relation to Segregation, R/ECAP, and Access to Opportunity, as well as demand for public housing and HCVs is included in section V.C. Publicly Supported Housing Analysis.

### **3. Contributing Factors of Disproportionate Housing Needs**

*Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disproportionate housing needs.*

The following contributing factors were identified during the community engagement process.

- **Availability of affordable units in a range of sizes**
  - There are not enough units for families. Families either live in apartments that are too small or more than one family lives together. This overcrowding can contribute to bug and rodent infestation. It is believed that this situation is more prevalent with Foreign-born residents.
  - Waiting lists for public housing properties illustrate the need for affordable housing for all bedroom sizes.
- **Displacement of residents due to economic pressures**
  - It was reported that low-income people of color and seniors are being pushed out of their homes in hot areas. The problems of gentrification and displacement are exacerbated when developers have no ties to the community.
  - Some developers are calling Metro Codes to put pressure on people to sell.
  - Apartments are being sold and tenants are only provided 30 days' notice; some tenants only are given a few weeks to move out.
  - Some people sell because they cannot afford the taxes.

- “As housing costs increase, residents become cost burdened and must seek more affordable housing elsewhere. In many neighborhoods this has resulted in the displacement of residents, and drastic neighborhood change as existing homes are upgraded or replaced with new construction.” (*HUDII - 190 Adopted June 22, 2015 Housing*)
- **Displacement of and/or lack of housing support for victims of domestic violence, dating violence, sexual assault, and stalking**
  - It is not easy for a woman experiencing abuse to move away from abuse.
  - Landlords do not want to rent to domestic violence victims.
- **Lack of access to opportunity due to high housing costs**
  - Some people cannot afford to pay 30% of their income for rent.
  - Some landlords on the HCV list are charging \$1500-\$1600 for one bedroom apartments.
  - People have to live in overcrowded conditions because they cannot afford to live on their own.
  - The Mayor’s *Housing Nashville* report provides the need for affordable housing by income group.
- **Land use and zoning laws**
  - Inclusionary housing needs to be implemented equitably throughout the county rather than concentrated in certain areas, especially where affordable housing already exists. For example, residents in Bordeaux feel as if they have disproportionate share of affordable housing in their community and would like for Metro-owned property there to be used for market-rate housing.
  - Some residents there is disparity in rezoning efforts, where one owner can get property rezoned but a neighbor cannot.
- **Lending discrimination**
  - It was reported that African-Americans and Hispanics are offered higher interest rates than Whites.
  - There are traditional perks for homeownership for middle and higher income such as tax and interest incentives. The problem for lower income individuals is having enough for the down payment and adequate credit history.
  - HMDA data shows that African-Americans are least likely to get a home loan than those of other races.
- **Loss of Affordable Housing**
  - Too much of Nashville’s housing stock is being demolished, and Nashville is running out of affordable areas in which to live.

- According to the *Housing Nashville* report, Nashville has lost more than 20% of its affordable housing stock since 2000.
- **Source of income discrimination**
  - Landlords charge exorbitant rents when the tenant does not have a social security card.
  - Landlords charge extra fees when the tenant has a voucher or ask the tenant how s/he will pay for utilities.
  - Landlords refuse voucher-holders who have no income in favor of a voucher-holder with an income.