

2020 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING
CHOICE IN LOUISVILLE METRO, KY

Prepared by Metropolitan Housing Coalition for
Louisville Metro Government
Develop Louisville
Office of Housing and Community Development

LOUISVILLE METRO, KY

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2020 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE IN LOUISVILLE, KY

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Introduction

Since the inception of the U.S. Department of Housing and Urban Development (HUD) in 1965, the agency has been committed to eliminating racial discrimination and racial segregation as it pertains to the development, provision, ownership and management of housing in America. Though this agency was originally created with a focus on racial discrimination, over time, more protected classes have been added. In order to affirmatively further fair housing, HUD's current mission is to "increase homeownership, support community development and increase access to affordable housing free from discrimination." To fulfill this mission, HUD will embrace high standards of ethics, management and accountability and forge new partnerships, particularly with faith-based and community organizations, that leverage resources and improve HUD's ability to be effective on the community level." Through the Office of Fair Housing and Equal Opportunity (FHEO), HUD administers and enforces federal laws and establishes national policies that make sure all Americans have equal access to the housing of their choice. Such laws and policies include implementing and enforcing the Fair Housing Act and other civil rights laws, including Title VI of the Civil Rights Act of 1964, Section 109 of Title I of the Housing and Community Development Act of 1974, Section 504 of the Rehabilitation Act of 1973, Title II of the Americans with Disabilities Act of 1990, the Age Discrimination Act of 1975, Title IX of the Education Amendments Act of 1972, and the Architectural Barriers Act of 1968.

To ensure the prevention and elimination of housing discrimination, and housing segregation as it pertains to fair housing choice, HUD requires all entitlements or jurisdictions directly receiving any of the four HUD formula grant programs, Community Development Block Grant (CDBG), Emergency Solutions Grant (ESG), HOME Investment Partnership Program (HOME), and Housing For People With Aids (HOPWA), to certify that the jurisdiction will "affirmatively further fair housing choice" within their area of authority. This requirement is codified in the Consolidated Planning process requirements under 24 Code of Federal Regulations (CFR) 91.225. Receipt of any of the HUD four formula grant programs is predicated upon the receipt of the local jurisdiction's Consolidated Plan along with an Analysis of Impediments to Fair Housing Choice (AI) which identifies the impediments and provides strategies to cure the impediments identified. "Affirmatively furthering fair housing" is defined by HUD as requiring a local jurisdiction to conduct an analysis to identify impediments to fair housing choice within the jurisdiction; to take appropriate actions to overcome the effects of any impediments identified through the analysis; and to maintain records reflecting the AI and actions taken in this regard. The Affirmatively Furthering Fair Housing Regulation passed in 2015, while suspended in part, shows an approach that is taken here.

Public and private entity obligations under 24 CFR 91.225 can be grouped into three categories:

Intent: the obligation to avoid policies, customs, practices, or processes whose intent or purpose is to impede, infringe, or deny the exercise of fair housing choice on the basis of race, color, religion, sex, national origin, disability and familial status.

Effects: the obligation to avoid policies, customs, practices, or processes whose effect or impact is to impede, infringe, or deny the exercise of fair housing rights on the basis of race, color, religion, sex, national origin, disability and familial status.

Affirmative Duties: the obligation and fiduciary responsibility of public agencies to anticipate policies, customs, practices, or processes that previously, currently, or may potentially impede, infringe, or deny the exercise of fair housing choice on the basis of race, color, religion, sex, national origin, disability and familial status.

The first two obligations pertain to public agency operations and administration, including employees and agents, while the third obligation extends to private as well as public sector activity.

According to HUD requirements, an Analysis of Impediments to Fair Housing Choice (AI) consists of:

- An overview of demographic and housing market conditions in the local jurisdiction, particularly as they pertain to housing choice.
- A profile of fair housing in the local jurisdiction, including current laws, policies and practices, and the number and status of any fair housing complaints in the local jurisdiction.
- An assessment of various market and public policy impediments to fair housing choice.
- Action steps to remove any impediments.
- In addition, this AI will track the actions taken to meet the recommendations.

In the 2010 AI HUD defines impediments to fair housing choice as: “Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin which restrict or which have the effect of restricting, housing choices or the availability of housing choice.”

It is important to realize that HUD does not restrict the scope of the AI to those actions that are in direct violation of federal, state or local fair housing laws, but rather to actions, omissions or decisions that have the ultimate effect of restricting fair housing choice.

This document, the *2020 Analysis of Impediments to Fair Housing Choice for Louisville Metro, Kentucky*, is broken into seven major sections. First this document examines the state of housing choice for the protected classes in Louisville Metro and the universal themes that impact housing patterns, suggesting that there is link between fair housing choice and affordable housing. The second section will look at the role that the Land Development Code has on fair housing choice. Third, this AI has added a section on the COVID-19 crisis as, although we are in the midst of it, we need to start planning for the impact on fair housing outcomes. The fourth section looks at progress made based on the 2015-2020 AI plan. The fifth and perhaps most important section, lists recommended action steps to promote fair housing choice and to eliminate impediments for 2020-2025.

Added into the data is the outcome of the survey conducted which gave people a chance to test their knowledge of fair housing and to submit comments and suggestions. Next, this document explains impediments to fair housing choice from the perspective of enforcement agencies and looks at their reported complaint statistics. All seven sections are supported by data and testimony that are listed on the reference page found at the end of this document. A review of current laws that affect fair housing is included in this document.

State of Housing Choice for Protected Classes

“As Louisville grows and becomes increasingly diverse, its housing needs grow and change as well. A home- and its location- can have an enormous impact on a family’s quality of life. It can provide fundamental stability, facilitate choice in lifestyle, and create opportunities for intergenerational economic mobility. Today, the extent to which a family is positively impacted by its home may be heavily dependent on its location on Louisville’s map.”

This is the opening statement of the Louisville Housing Needs Assessment commissioned by the Louisville Metro Government, Office of Housing and Community Development and the Louisville Affordable Housing Trust Fund. This ethos, from the highest levels of local government and our local affordable housing financing organization compels Louisville to be honest in the assessment and brave in the plan to address any impediments to fair housing choice.

On January 6, 2003, Jefferson County and the City of Louisville merged to become Louisville Metro. However, there remain several incorporated cities within the geographic boundaries of Louisville Metro which have their own land development codes. This *Analysis of Impediments of Fair Housing Choice* covers the whole geographic area, but policies and land use laws are not entirely controlled by this jurisdiction.

In Louisville, there are nine classes of people under the combined federal, state and local housing laws. The protected classes are: race, color, national origin, sex, familial status, religion, disability, sexual orientation and gender identity. Added to Louisville’s local civil rights ordinance in 1999, sexual orientation and gender identity are the only locally protected classes besides federally protected classes. Also, local fair housing laws pertaining to rental housing are enforced if the owner has just two units instead of the federally mandated four units. In homeownership, the laws cover all transactions, with no minimum.

Like many older American cities, Louisville has well-defined neighborhoods, many with well over a century of history as a neighborhood. The oldest neighborhoods are the riverside areas of Downtown and Portland (initially a separate settlement), representing the early role of the river as the most important form of commerce and transportation. As the city expanded, peripheral neighborhoods like Butchertown, Phoenix Hill, Russell, Shelby Park, Smoketown, and others were developed to house and employ the growing population. The history of housing segregation in Louisville is thoroughly discussed in the publication of the Louisville Metro Human Relations Commission, *Making Louisville Home for Us All: A 20-Year Action Plan to Further Fair Housing*.

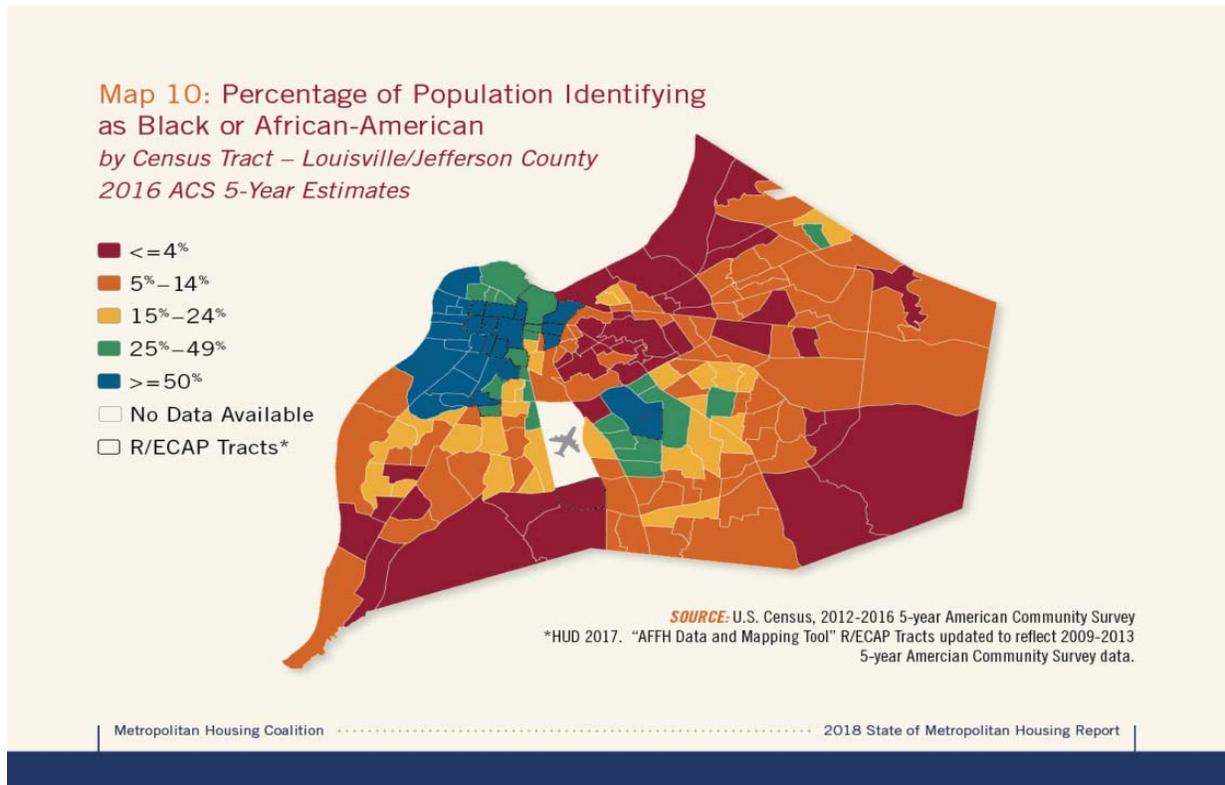
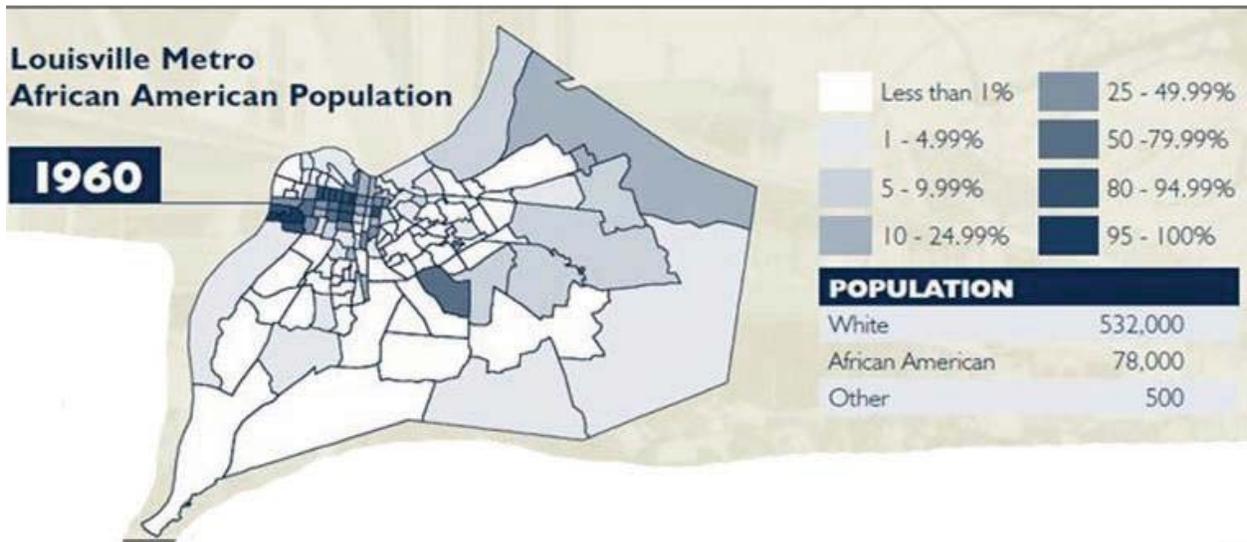
Where do people live?

African Americans

In Louisville/Jefferson County about 70% of the population is white. The black/African American population represents 22 percent of the population in Louisville/Jefferson County. The Latinx population is about 5% and the Asian population is about 2.5% and 2% self-identify as two or more races.

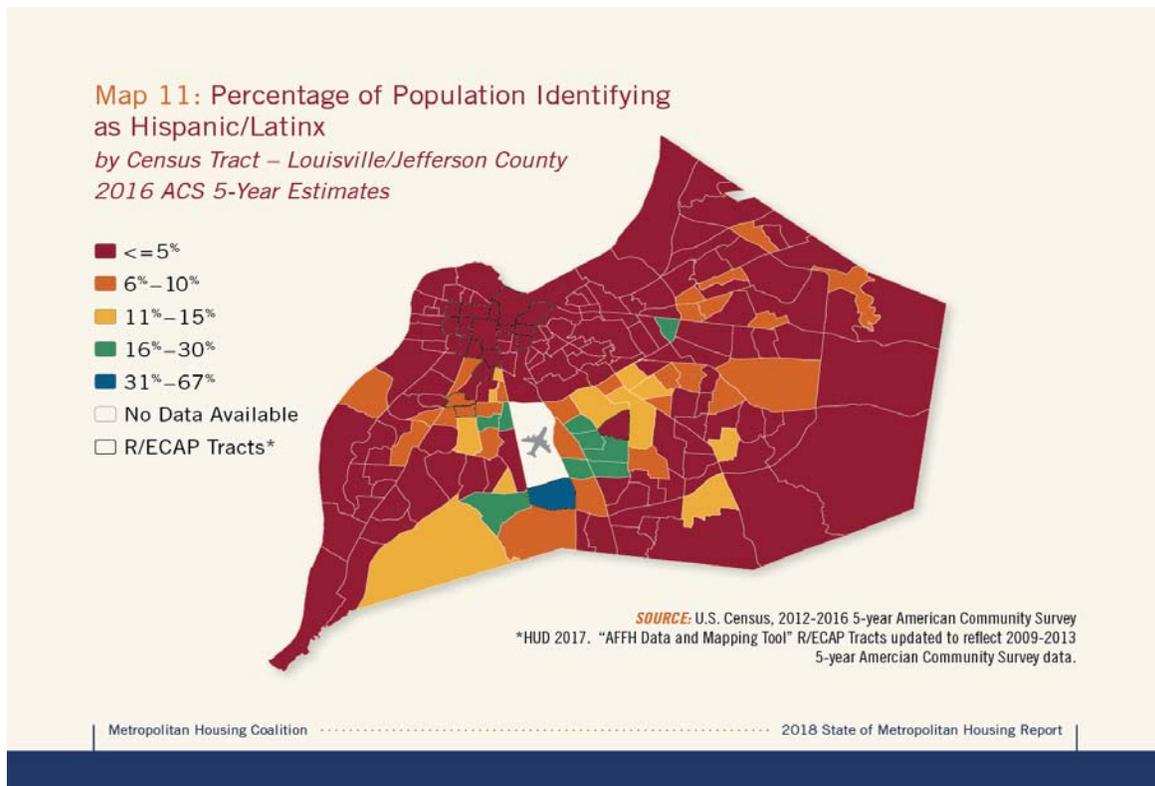
The maps showing segregation by race in 1960 contrast with the current map (using U.S. Census 2016 5- Year American Community Survey). While the number and percent of people who identify as black/African American has increased from 131,000 in 2000 to over 162,000, the greatest change is that the number of census tracts that are racially segregated has increased for black households. Even looking at ownership for black households, we see that half of all black homeowners live in only 22 of 198 census tracts.

The highly segregated areas also have health and prosperity outcomes that are concerning and will be addressed in later sections.



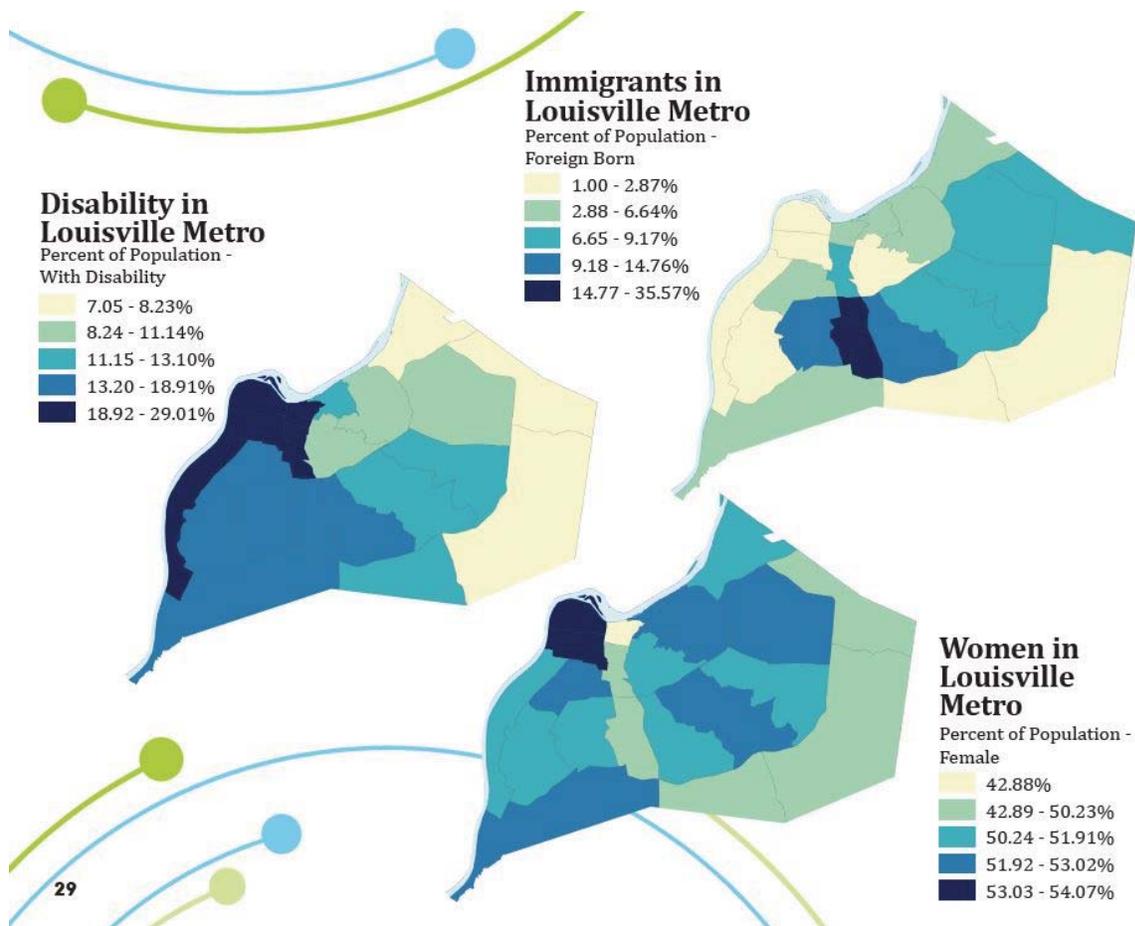
Ethnicity and National Origin

Latinx households are the largest percentage of international residents. The decades of immigration to Louisville means there are people born and raised in Louisville who identify as Latinx. There are people from different parts of the world in Louisville and where they live can also be stratified by wealth and country of origin. This is an added element in determining attitudes toward different ethnicities and countries of origin.



The Louisville Metro Health Equity Report has a map of immigrants in Louisville Metro, including those identifying as Hispanic/Latinx and who are foreign born. The Health Equity Report estimates that 6.7% of Louisville Metro residents were born outside the United States, U.S. Census Bureau 2011-2015 American Community Survey. The Jefferson County Public Schools, in 2017, estimated that 136 languages were spoken.

Note that the map showing where all immigrants live show some higher percentages in east Louisville, that is not the case for Latinx, stressing the need to have policies within the protected classes of Ethnicity and National Origin.



The Health Equity Report shows the change in race and ethnicity in Louisville between the years 2000, 2010 and 2015. The percent (not number, but percent) of the population that is white is decreasing and the percent of the black and Hispanic populations are increasing. This is a trend we expect to continue.

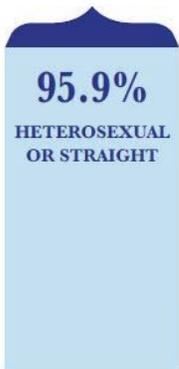
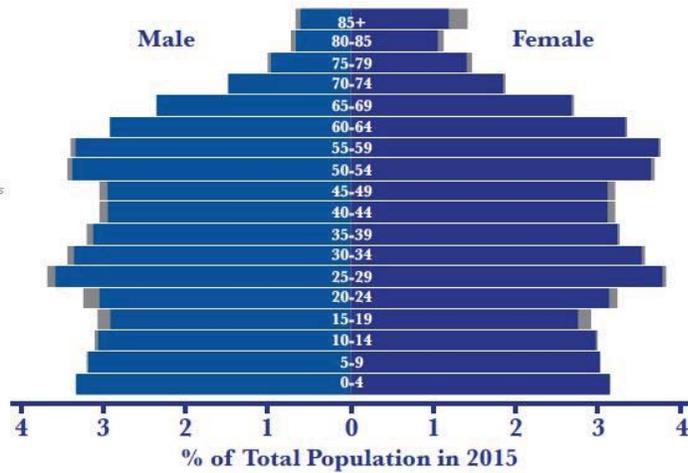
Gender Identity and Sexual Orientation

The Louisville Metro Health Equity Report estimated that 17,700 adults identify as transgender in Kentucky, The Williams Institute, June 2016. Within Louisville, using the 2014 Louisville Metro Department of Public Health and Wellness BRFSS, the estimated percent of population that is homosexual or gay/lesbian is 2.2% and 1.9% of the populations is bisexual.

Snapshot of Louisville Metro's Demographics

POPULATION PYRAMID for Louisville Metro

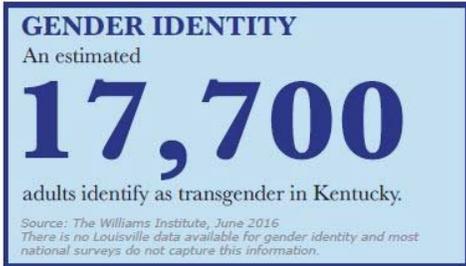
Source: U.S. Census Bureau, 2011-2015 American Community Survey
Group quarters facilities include college dormitories, nursing facilities, correctional facilities, military barracks and homeless shelters.



SEXUAL ORIENTATION



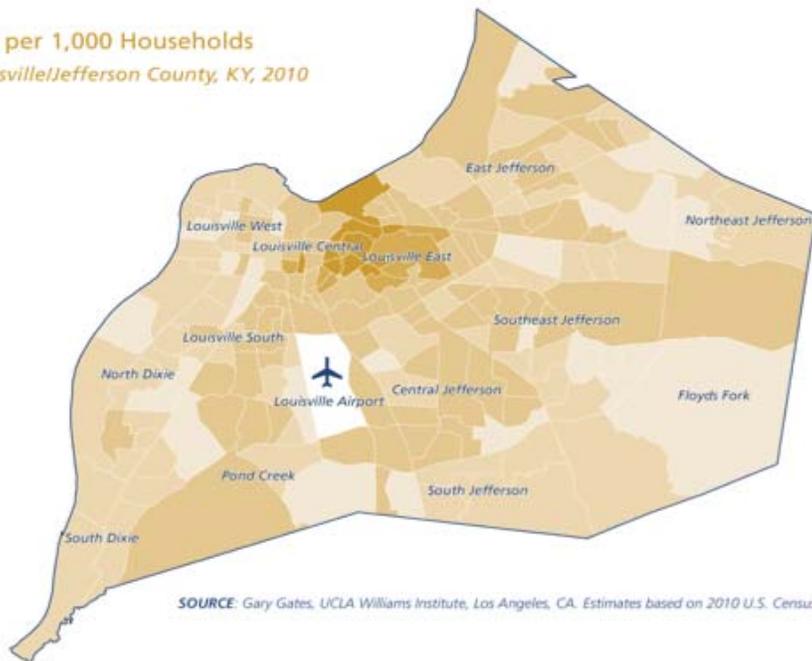
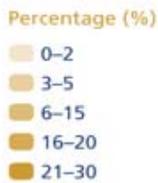
Source: 2014 Louisville Metro Department of Public Health and Wellness BRFSS
Respondents were asked if they identified as labeled above. These are the same questions/language used by the CDC. Percents reflect weighted samples, not a census. The census does not collect data on sexual orientation.



Source: The Williams Institute, June 2016
There is no Louisville data available for gender identity and most national surveys do not capture this information.

MAP 6

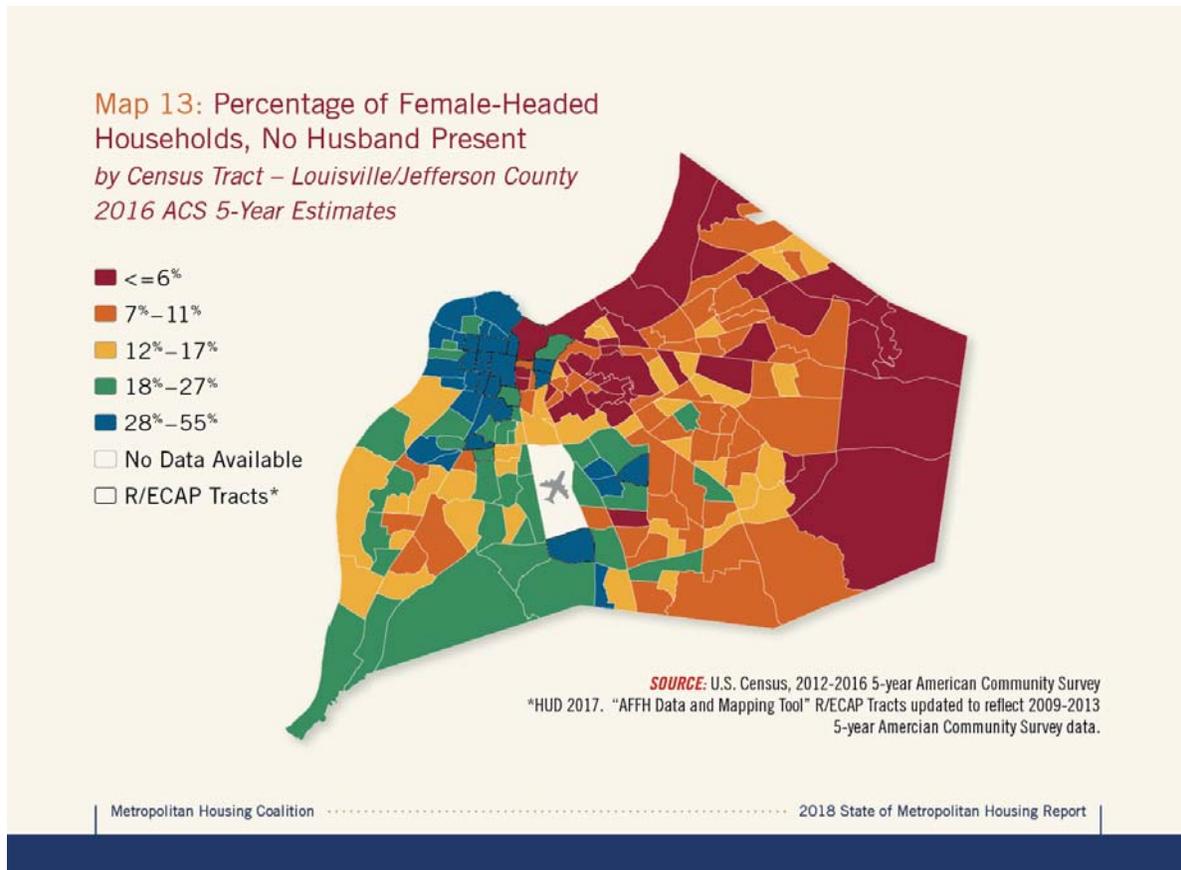
Same-Sex Couples per 1,000 Households
By Census Tracts, Louisville/Jefferson County, KY, 2010



SOURCE: Gary Gates, UCLA Williams Institute, Los Angeles, CA. Estimates based on 2010 U.S. Census.

Women and Familial Status

Comparing the map above of where women live with the map below, where female-headed households live, shows that female-headed households are segregated, including those with children. The later sections will discuss the health and prosperity outcomes of these areas. Of note is that poverty will be a main characteristic of the concentrations, regardless of race.



Grandparents Raising Grandchildren

Of the 13,402 grandparents living with grandchildren, 46%, or 6,259 are responsible for the child(ren), according to the American Community 2014-2018 5-Year Survey estimate. Of the 6,259, 70% are women.

Residents with Disabilities

People with disabilities are 14.7% of the population. Yet they remain segregated in where they lived. The areas of concentration mirror the areas where many other protected classes live. For the most part, these concentrations occur in the west end of Louisville, with further concentration in the north-western Louisville. The census tracts with over 25% of the population being people with disabilities are: 2, 3, 10, 21, 23, 24, 28, 36, 41, 43, 02, 50, and 51 which is west of 9th Street. Census tract 51 has a population that is 35.6% persons with disabilities. These areas of Louisville also have the highest concentrations of poverty, easily illustrating the need of affordable housing and fair housing choice for people with disabilities, many who live on fixed incomes.

While the medical services and the transit options of downtown Louisville offer some incentives for living in these areas, there is a concentration along the southwest part of Louisville that is not part of those incentives. Also, downtown has the most subsidized housing opportunities which often limit the choice of people with fixed incomes- those unable to work may be most at risk for loss of opportunities.

The lowest populations of persons with disabilities are in the east with census tract 115.18 having a population of persons with disabilities of only 2.8%)

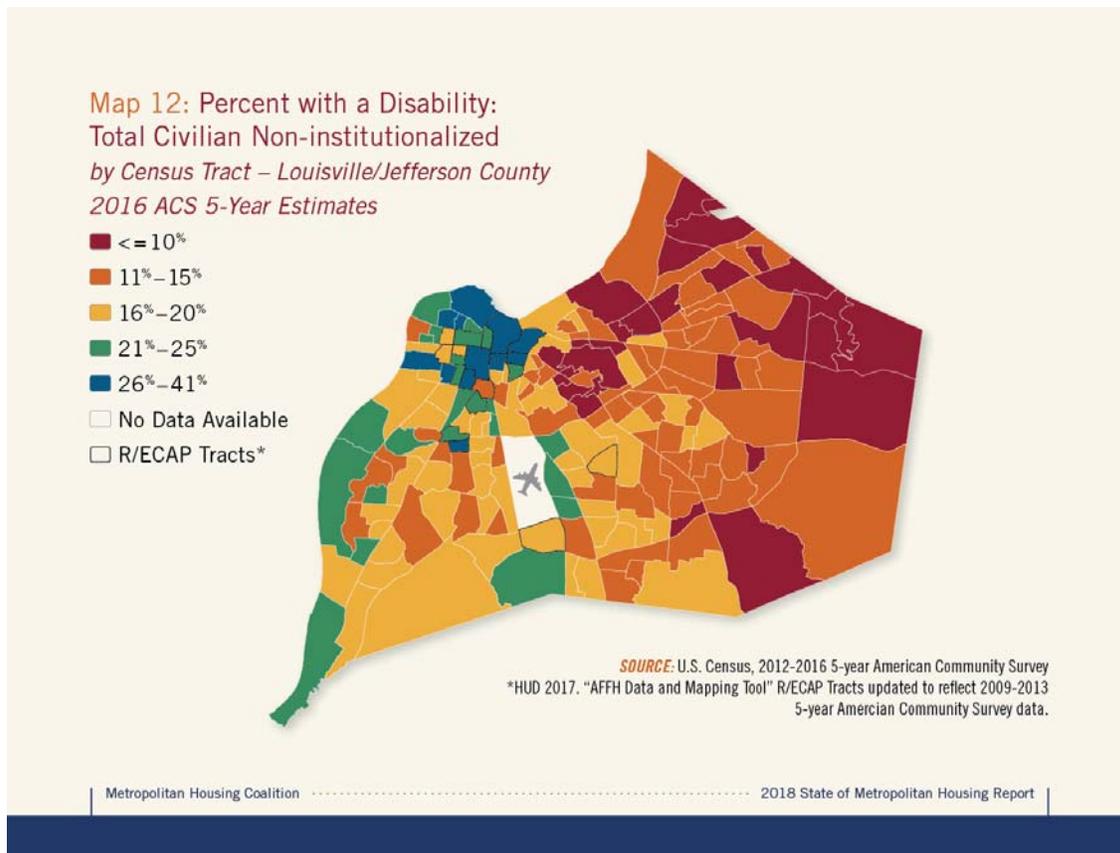


Figure 3: Number of Non-Institutionalized Individuals by Disability Type¹

	Jefferson County		Louisville MSA	
	Total Number		Total Number	
Total Non-Institutionalized Population	742,865		1,235,100	
Total Non-Institutionalized Population with a Disability	109,088		177,962	
	Total Number	Percentage of Non-Institutionalized Population	Total Number	Percentage of Non-Institutionalized Population
Number of People with a Hearing Difficulty	24,022	3.2%	43,512	3.5%
Number of People with a Vision Difficulty	17,449	2.3%	28,852	2.3%
Number of People with a Cognitive Disability	46,398	6.2%	73,060	5.9%
Number of People with an Ambulatory Difficulty	58,694	7.9%	95,077	7.7%
Number of People with an Independent Living Difficulty	21,518	2.9%	34,846	2.8%
Number of People with a Self-Care Difficulty	39,460	5.3%	63,084	5.1%

¹Individuals can identify in multiple disability categories. Therefore, the totals for each difficulty category can overlap and therefore will not add up to the total non-institutionalized disabled population

SOURCE: U.S. Census: American Community Survey 2010-2014, 5-Year Estimates

Disabilities range from physical disabilities to emotional, intellectual or psychological disabilities. Of all the protected classes, disability is the only protected class wherein a landlord is required to make reasonable accommodations or modifications to ensure the environment is user friendly to the particular person and the particular disability. This ranges from building a ramp for accessibility to allowing a working animal where there is a no pet policy.

More people will have disabilities both as the population ages and as war veterans return home. There must be a plan for how to accommodate the range of people with disabilities of all types.

In 2000, the Kentucky State Legislature passed House Bill 843, requiring that each of the 14 mental health centers throughout the state convene a Regional Planning Council to produce a plan for mental health and substance abuse needs and service in that region. Louisville Metro/Jefferson County is the hub of Region Six, which includes six other counties. In 2000, “*HB 843 Report: Region 6 (Seven Counties Services, Inc.) Regional Plan & Recommendations Summary*” reported the recommendations of the Planning Council.

The first goal in the Planning Council’s 2000 Report is to, “Increase the number of supported housing units (including group, individual and independent housing arrangements) in the region for persons with mental illness and substance abuse problems by 50% by 2006. This housing must include supportive services to encourage and sustain independent living. An array of supportive services would include such things as job training and placement, transportation, interpreter/translation services, childcare, training in daily living skills, case management, support groups, medication monitoring, nutrition, recreation and socialization activities.”

While the federal government stopped the “811” program to create rent assisted housing for those with a disability, local government has continued its efforts. Louisville Metro has dedicated Community Development Block Grant money and Low Income Housing Tax Credits have been used to create affordable housing for those with a disability. The Housing Opportunities For Persons With AIDS program continues being funded. However there is a recognition that in the future housing for persons with a disability that is affordable to someone on a fixed income will need to increase.

In June 2019, the University of Louisville Commonwealth Institute of Kentucky released “Solving Street Homelessness in Louisville, KY: Improving the Climate of Care for Individuals Experiencing Homelessness”. “Proactive measures to further fair housing opportunities are necessary to consider as a means of preventing homelessness”. (Page 29 of the report). Trauma, health disabilities and addiction play a role in causing and keeping people homeless. Much of this could be avoided with housing affordable to those in protected classes, who, as part of the centuries of discrimination, have lower incomes.

The Fair Housing Act (FHA) prohibits local governments from making zoning or land-use decisions or implementing land-use policies that exclude or discriminate against individuals with disabilities. As new concepts of housing people with disabilities are developed, reconciling those delivery models with the Land Development Code will become a necessary procedure.

Elderly

While “Elderly” or being over a certain age is NOT a protected class in fair housing laws, there is an increasing focus on how people in this category are faring in housing choice. U.S. HUD has included being elderly as being in a protected class in some policies. One day age may be included as a protected category in housing. Because there are several definitions of elderly, from 55 to 65, in use by federal law and Louisville Metro Housing Authority there are several different presentations of the data; be sure to read the age specified.

By all estimates, there will be a surge in the number and percent of the population over the age of 60 expected in the next ten years and planning and providing appropriate housing needs to start now. Women live longer than men, so oldest adults are more women and about two thirds of people over the age of 85 are women. This is shown in the age pyramid chart in an above section. Therefore, housing issues for those aging can be entwined with the issues facing people with disabilities and gender discrimination, though they may take the form of more subtle forms of discrimination.

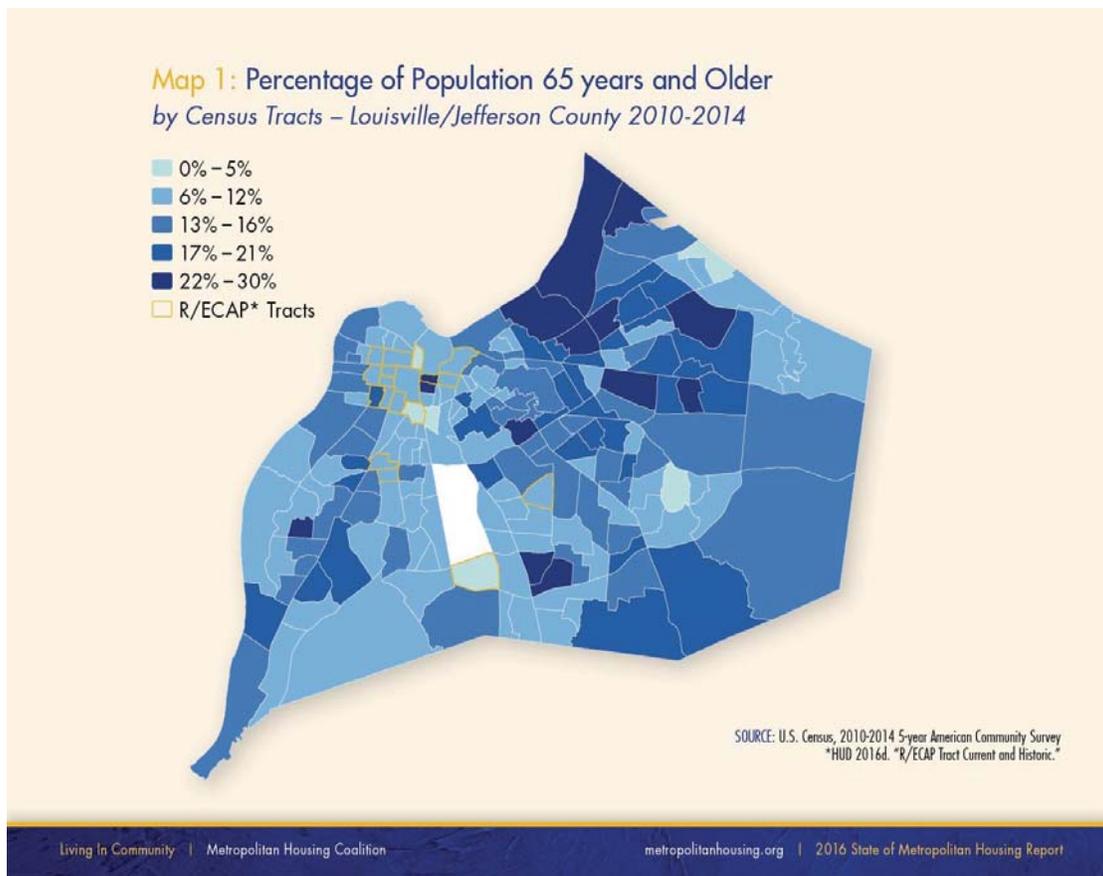
The main fair housing issue for the “Elderly” is affordability and affordable home-based services included in housing costs. This will prevent institutionalization of older adults. The model we see for services connected with housing to avoid institutionalization is the “housing first” model which inextricably links services with success in housing. This is an important model and keeping the total cost affordable is a challenge.

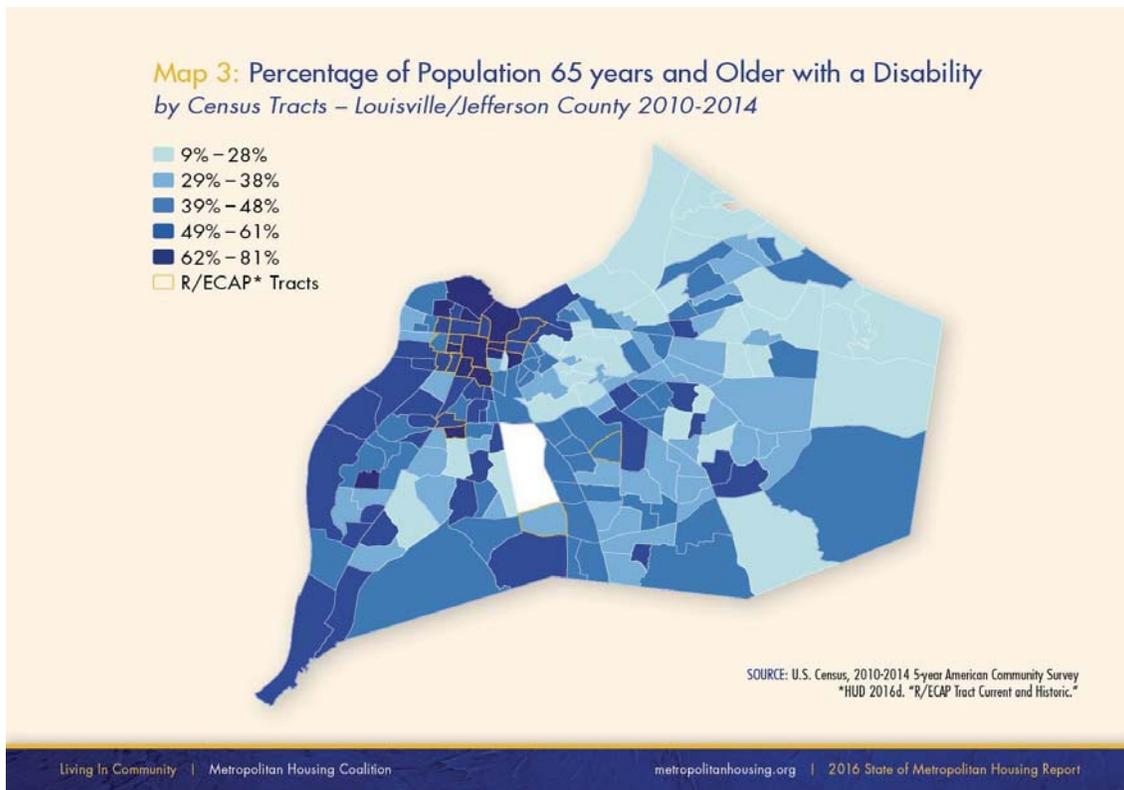
In 2015 Mayor Fischer signed the Milken Institute, Center for the Future of Aging’s “Mayor’s Pledge” that commits to working for a city that functions for older residents and empower older residents to fully participate in the functioning of the city.

Reverse mortgages are a specific housing problem for the elderly. Those who are 65 or older and need income, especially to pay medical expenses or services to live, may choose this option, but it has dangers. While there is more control of the industry, it is still confusing as to benefits and consequences of choosing to enter into a reverse

mortgage. One example is the time limitation of payment and the date the purchaser owns the home outright. People are living longer than the reverse mortgage terms and then have to leave and no longer have the income. For some even the reverse mortgage does not give sufficient income for their needs, but the person can no longer get at the asset.

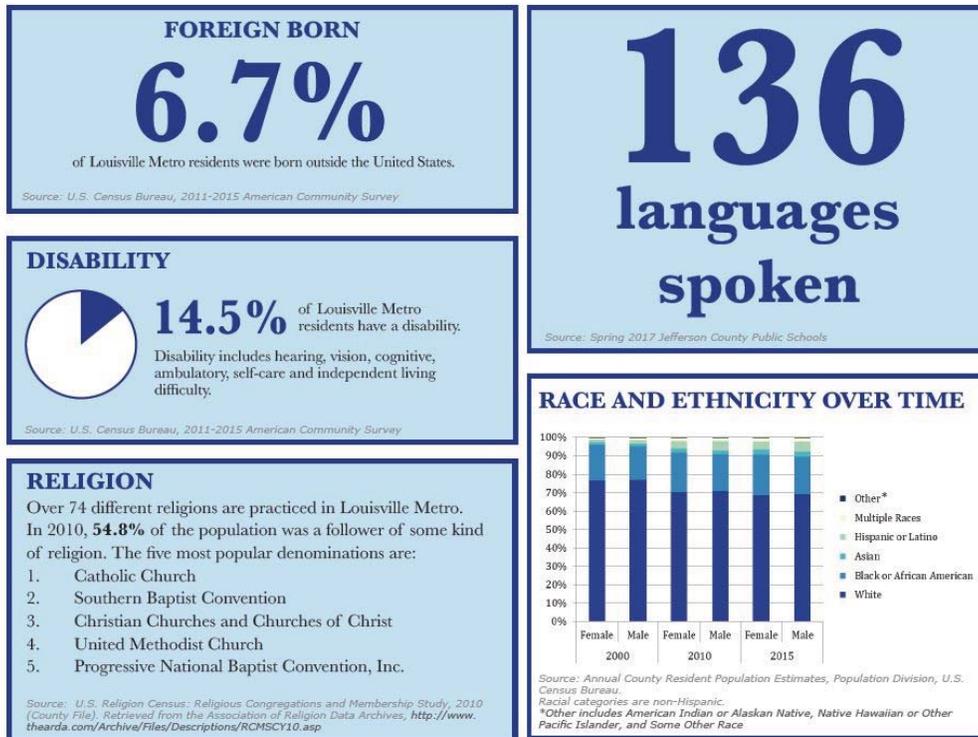
An issue shared with people with some types of disabilities is the less than ubiquitous use of Universal Design for accessibility. While the Kentucky Housing Corporation has required Universal Design in units funded by Low Income Housing Tax Credits, there is not wide spread use. The concept of Complete Streets is a neighborhood design that will impact the elderly. This initiative is under way in Louisville but at a slow pace.





Religion

As Louisville grows through international diversity, there is an increasing population of those practicing religions that are a minority in Louisville, e.g. Buddhism, Islam. While there have not been housing discrimination complaints based on religion, government services in housing need to be sensitive to the religious requirements of this growing population.



Veterans

Veterans experiencing homelessness has been on a steady decline since the peak in 2013 due to a successful campaign to house homeless veterans during the life of the expiring AI. This speaks to the ability to make change where there is a great will to do so.

Homeless Population

“Solving Street Homelessness” showed, from the Homeless Management Information System (HMIS) that between 2012 and 2017 overall the homeless population declined, but that between 2016 and 2017 the population increased by over 5 percent. The unsheltered homeless population increased by 22.2 percent from 2015-2016 and by 4.2 percent between 2016 and 2017. Of unsheltered families, 78.3 percent were black and in general population there is a racial disparity.

School age children

During the 2018-2019 school year the percent of children in Jefferson County Public Schools (JCPS) who were homeless and/or experiencing severe housing instability at some point in the school year rose to 5% from 4.6% in the 2017-2018 in the school year, according to the *2019 State of Metropolitan Housing Report*.

A Metropolitan Housing Coalition 2009 report, *Where do you live? Louisville’s Homeless Children and the Affordable Housing Crisis*, studied the deleterious affect on the educational attainment of children who lack stable housing. Among homeless students in public school, there are significant reading and math achievement gaps that can be seen at all grade levels, beginning with 3rd graders. This is a predictor of graduation rates as are attendance data, which is negatively affected by homelessness.

Young adults

This is a subgroup that needs to be addressed because it is back on the rise after a decline. They increased in number by 13 percent in 2018. This group is very vulnerable

Domestic Violence

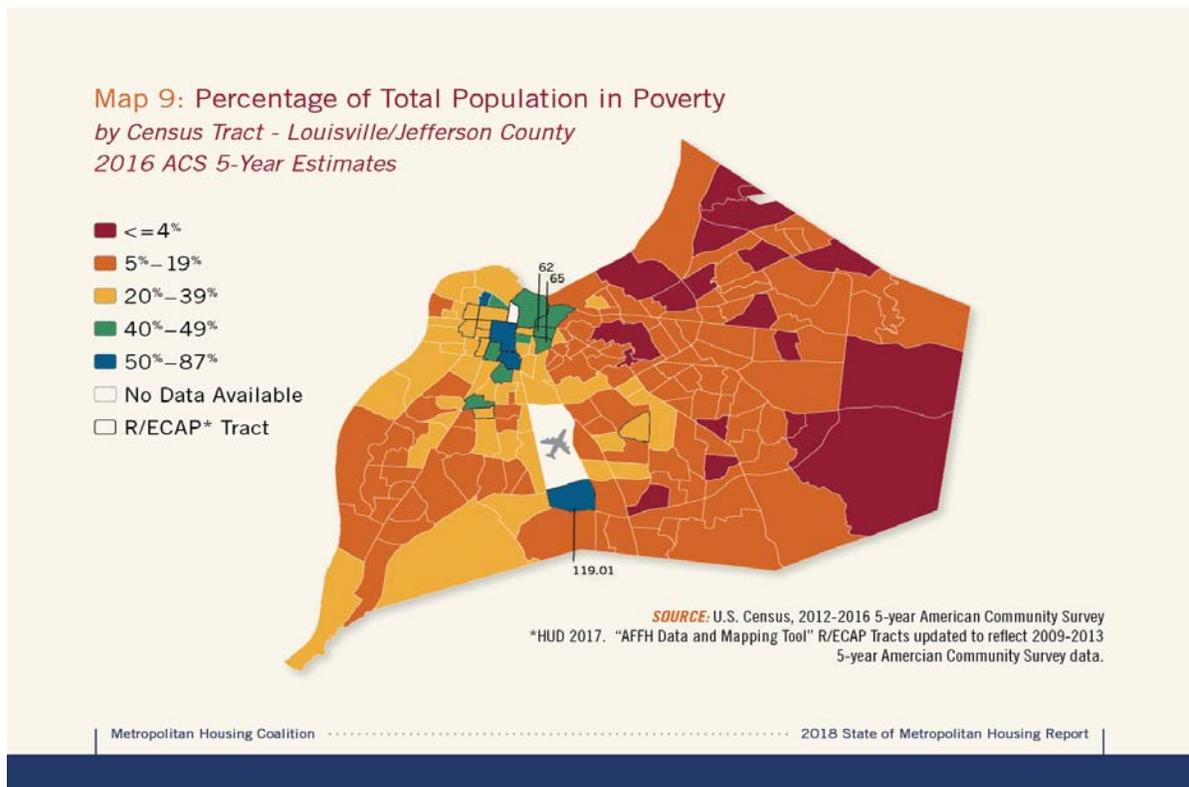
There has been a sharp increase in homelessness cause by domestic violence as this group has grown every year since 2015, most recently by 17 percent. This speaks to the great need for family shelter and permanent assistance.

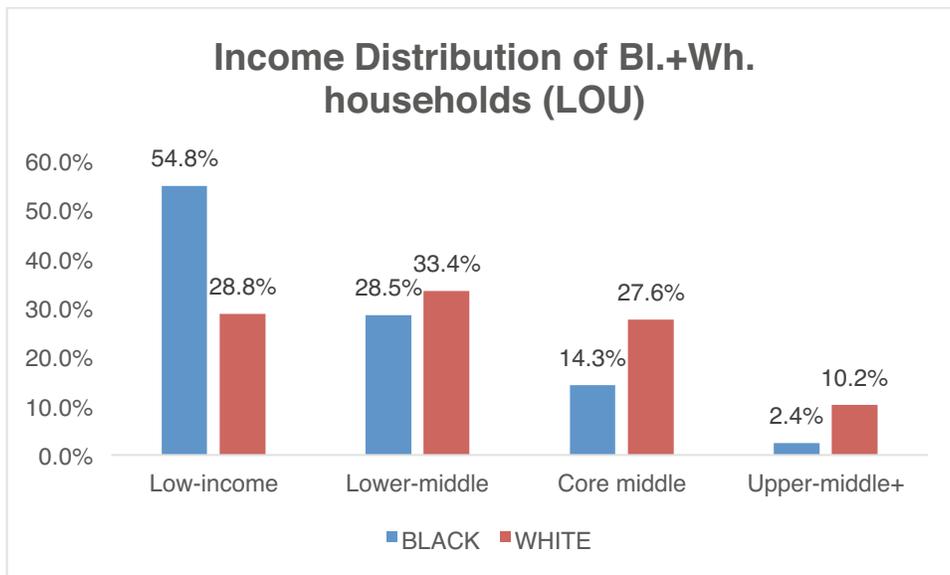
Universal Themes Affection Louisville's Protected Classes

In Louisville, there are clear areas of segregation by race, ethnicity, female-headed households with children, having a disability and being both elderly and having a disability. But the next question is whether there are any social determinants of health and economic well-being that coincide with the areas of segregation of those in protected classes.

Poverty

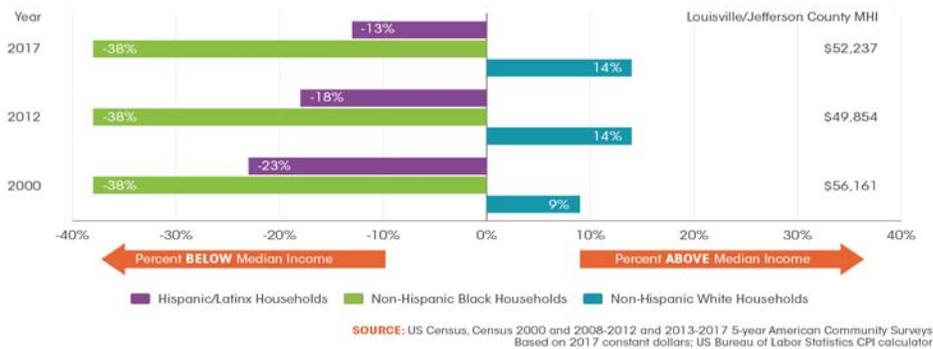
The map of poverty is below and is very linked to the protected classes. The income distribution by race is linked to disposable income for housing/utilities.





U.S. Census, 2012-2016 5-year American Community Survey data

Figure 6: Median Household Income by Race/Ethnicity as Percent Louisville/Jefferson County Median Household Income (MHI), 2000, 2012, 2017

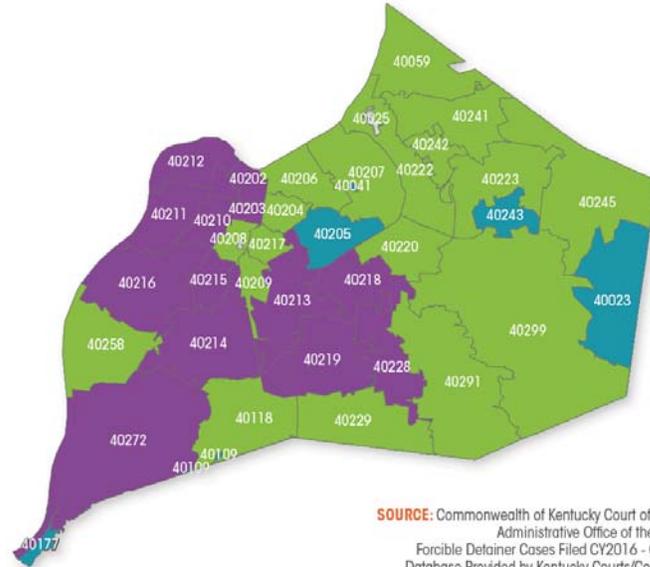


The maps of eviction rates and utility cut-offs also show severe housing instability in the areas that are dominantly those in protected classes. When we look at the stability of rental housing for those areas highly concentrated with black households and/or female headed households with children, we see a population under enormous economic stress. Evictions and utility cut-offs plague these areas which indicate how unstable housing is for these classes of households covered by the Fair Housing Act.

Map 6: Average Eviction Filing Rates (2016-2018)
by Zip Codes, Louisville/Jefferson County, KY

- 0.5% – 5.0%
- 5.1% – 15.0%
- 15.1% – 25.8%

*Total Filings = 51,217
 *Total Occupied Rental Units= 120,549
 *Average Rate 2016 - 2018 = 14.2 per 100 Occupied Rental Units

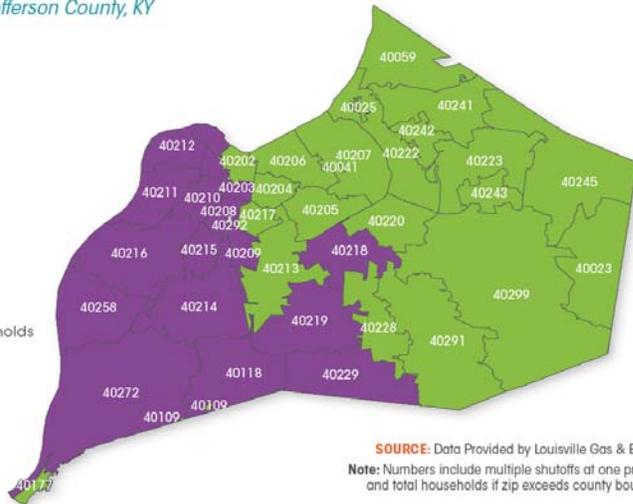


SOURCE: Commonwealth of Kentucky Court of Justice
 Administrative Office of the Courts
 Forcible Detainer Cases Filed CY2016 - CY2018
 Database Provided by Kentucky Courts/Courts Net

Map 5: Average Residential Utility Disconnection Rates (2017-2018)
by Zip Codes, Louisville/Jefferson County, KY

- 0.6% – 12.7%
- 12.7% – 53.8%

All Zip Codes:
 2-year Average Rate per 100 Households
 2017 Total Shutoffs = 39,403
 2018 Total Households = 42,179
 Total Households=321,360
 2-year Average Rate = 12.7 per 100 Households



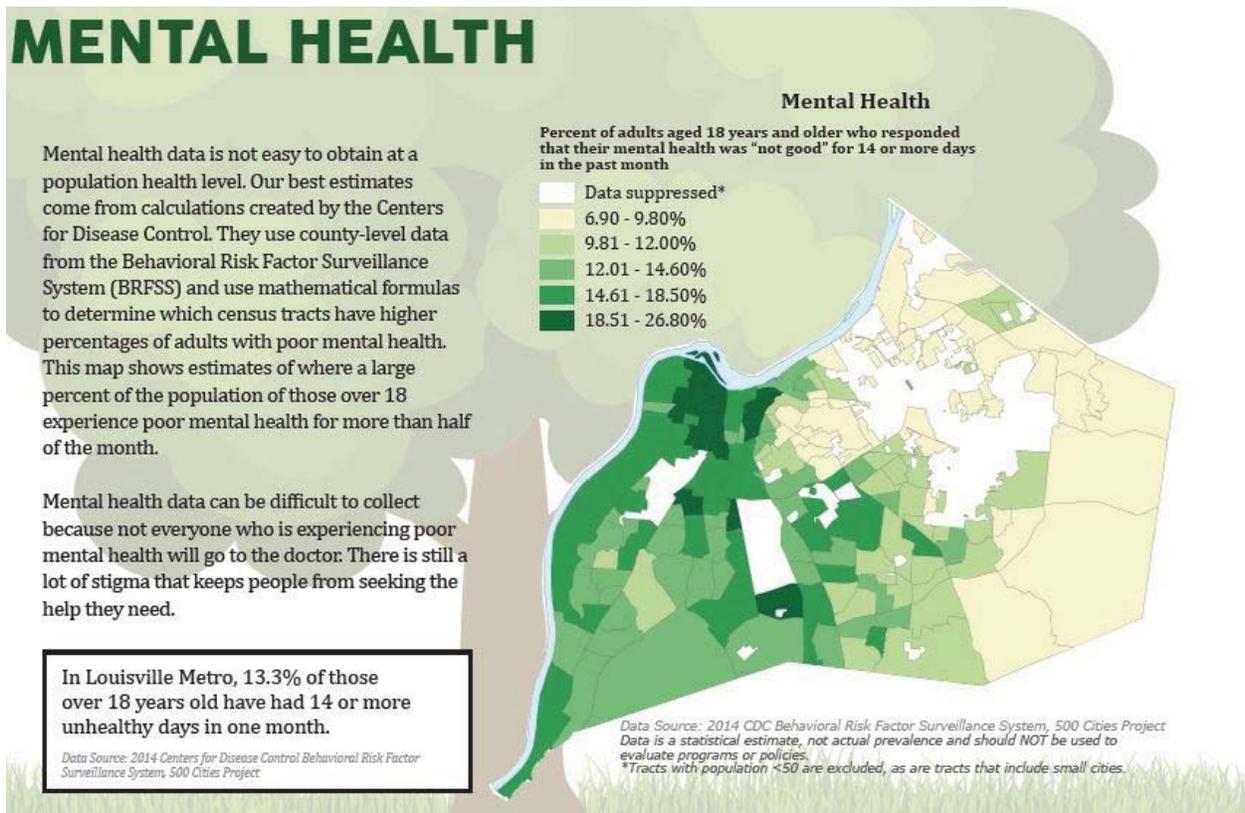
SOURCE: Data Provided by Louisville Gas & Electric
Note: Numbers include multiple shutoffs at one property and total households if zip exceeds county boundary.

Health Outcomes

The Louisville Metro Department of Health and Wellness has begun Healthy Louisville 2025, an initiative to improve the health of Louisville residents. It has four main goals and one “promoting health housing throughout the life course of Jefferson County residents by developing a set of fair housing policy recommendations”. The entwining of health outcomes with housing recognizes fair housing as an important element.

The findings of the Center for Health Equity in their report are that these areas are also significantly higher risk for mental health negative issues, for higher incidence of cancer and for poisoning children with lead. Most shocking is the lower life expectancy. These are all very negative outcomes by geography linked to segregation.

There is a movement in the health industry that recognized the “social determinants of health” and is addressing that entwining. While the health industry is tackling this by asking questions and making referrals, the Planning and Design Department of Louisville should consider the impact of how approve housing in all areas as a way to address this disparity.



LEAD POISONING

Lead Poisoning in kids under 6, 2011-2016

	Number of tests	Number of children
Blood lead level $\geq 5 \mu\text{g/dL}$	2319	1413
Blood lead level $\geq 15 \mu\text{g/dL}$	332	139

Data Source: 2011-2016 lead testing results from Louisville Metro Department of Public Health and Wellness. Tests and counts are based on children under the age of 6 at the time of the test.

There are no safe levels of lead, however, the Centers for Disease Control suggests that a level of 5 micrograms per deciliter ($\mu\text{g/dL}$) or higher is a "level of concern" in children. Data is reviewed for those under the age of 6, because this is the age cut off for federal lead programs.

In Louisville Metro, the most reliable lead data comes from the Louisville Metro Department of Public Health and Wellness, although it is not comprehensive of all lead tests that occur in the county. As such, the actual numbers are probably higher.

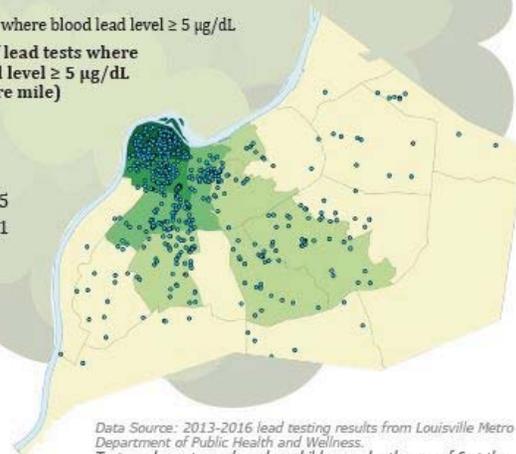
An estimated 1,413 children have blood lead levels that are $5 \mu\text{g/dL}$ or higher. These positive tests are clustered in downtown, west, and south Louisville.

Lead Poisoning

● Tests where blood lead level $\geq 5 \mu\text{g/dL}$

Density of lead tests where blood lead level $\geq 5 \mu\text{g/dL}$ (per square mile)

- 0-1
- 2-5
- 6-15
- 16-35
- 36-81



Data Source: 2013-2016 lead testing results from Louisville Metro Department of Public Health and Wellness. Tests and counts are based on children under the age of 6 at the time of the test. Tests where blood lead level was greater than or equal to $5 \mu\text{g/dL}$. Points based on residence at time of test. *This does not include all tests from Jefferson County, but accounts for at least 75% of all tests.

CANCER

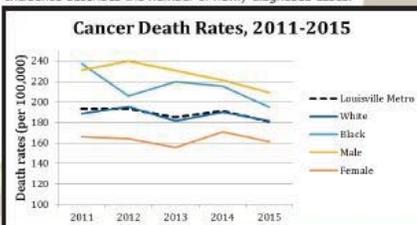
Cancer Incidence & Death Rates 2011 - 2014

	Count	Age-adjusted rate (per 100,000)
Black Male	701	263.08
White Male	3,366	225.01
Louisville Metro	8,240	188.47
Black Female	733	184.89
White Female	3,308	162.04
Hispanic Male	38	113.89
Other Female	36	106.82
Hispanic Female	33	93.60
Other Male	25	85.08

Data Source: 2011-2015 Kentucky Vital Statistics Age-adjusted to the 2000 U.S. Standard Population. Racial categories are non-Hispanic.

Cancer Type	Louisville Metro Age-adjusted Incidence Rate	Louisville Metro Age-adjusted Death Rate
All Cancers	393.3	119.4
Lung and bronchus	89.9	89.5
Breast (female only)	172.2	23.3
Prostate	126.8	26.1
Colorectal	54.6	15.5
Pancreas	14.5	11.8
Esophagus	17.8	8.8
Liver and intrahepatic bile duct	19.6	7.9
Stomach	11.7	6.7
Bladder	22.8	4.1
Cervical	6.6	3.2
Melanoma of the skin	38.7	3.1
Oral cavity and pharynx	14.7	2.2

Data source: Kentucky Cancer Registry <http://www.cancer-rates.info/ky>. Rates are age-adjusted to the 2000 U.S. Standard Population per 100,000 for the years 2011-2014. Incidence describes the number of newly diagnosed cases.

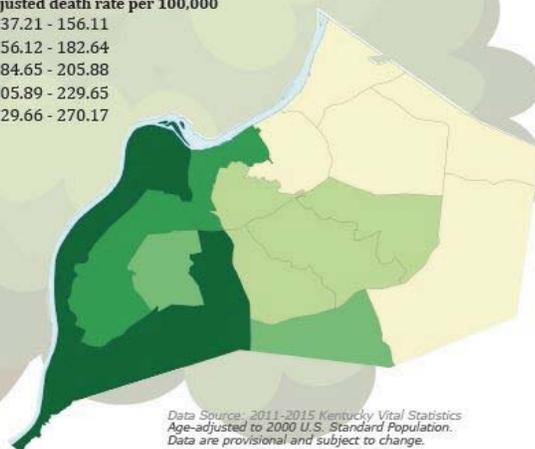


Data Source: 2011-2015 Kentucky Vital Statistics Age-adjusted to the 2000 U.S. Standard Population.

Cancer

Age-adjusted death rate per 100,000

- 137.21 - 156.11
- 156.12 - 182.64
- 184.65 - 205.88
- 205.89 - 229.65
- 229.66 - 270.17



Data Source: 2011-2015 Kentucky Vital Statistics Age-adjusted to 2000 U.S. Standard Population. Data are provisional and subject to change.

Cancer is the leading cause of death for Louisville Metro. Breast and prostate cancers are those that predominantly affect residents. Not all those who get cancer die from it, as the incidence rate (how many new people are diagnosed each year) is almost 3 times higher than the death rate for Louisville Metro, and has slowly been declining. Elevated cancer death rates are clustered in the entire western half of the county. Overall, White and Black men are dying at higher rates than women from any kind of cancer.

The median age of those who died from cancer in Louisville Metro from 2011-2015 was 72.

DEATHS

“At some point, everyone will die. But at what age and with what degree of suffering?”
 – Nancy Krieger

Deaths Due to All Causes Total 2011 - 2015

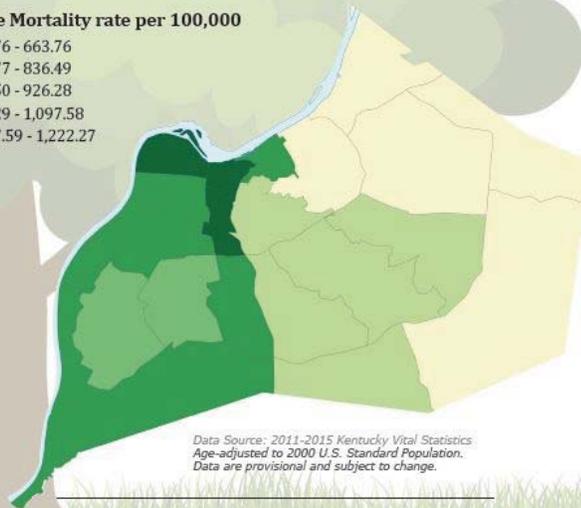
	Count	Age-adjusted rate (per 100,000)
Black Male	3,220	1,199.38
White Male	14,592	1,012.02
Louisville Metro	36,970	848.96
Black Female	3,151	795.59
White Female	15,422	708.52
Other Male	149	516.01
Hispanic Male	182	436.08
Other Female	128	419.58
Hispanic Female	126	339.75

Data Source: 2011-2015 Kentucky Vital Statistics
 Age-adjusted to the 2000 U.S. Standard Population.
 Racial categories are non-Hispanic.

Death Due to All Causes

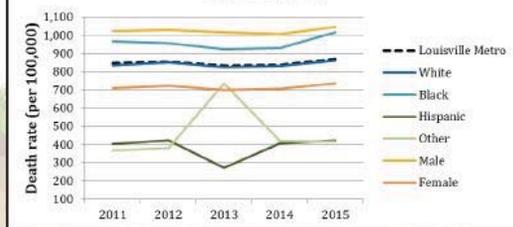
All-Cause Mortality rate per 100,000

- 606.76 - 663.76
- 663.77 - 836.49
- 836.50 - 926.28
- 926.29 - 1,097.58
- 1,097.59 - 1,222.27



Data Source: 2011-2015 Kentucky Vital Statistics
 Age-adjusted to 2000 U.S. Standard Population.
 Data are provisional and subject to change.

Death Rates Due to All Causes, 2011-2015



Data Source: 2011-2015 Kentucky Vital Statistics
 Age-adjusted to the 2000 U.S. Standard Population.

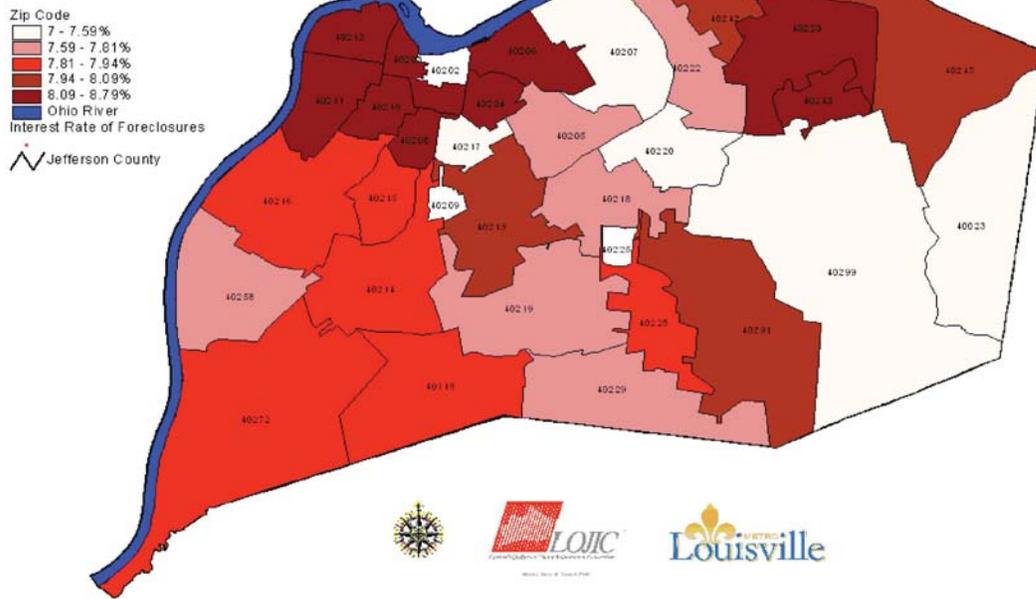
The median age of those who died in Louisville Metro from 2011-2015 was 76. However, different populations are dying at different rates. Men have higher death rates than women because they are more likely to die prematurely from things like overdose, transit accidents, homicide and suicide. We also find that Black populations are dying at greater rates than their same gender counterparts, in part due to systemic oppression which differently patterns the way people experience root causes such as housing, employment, and education.

Ownership and Rental

Since the Great Recession, the disparities of homeownership have become a more crystallized issue. While 70% of white households own, 36% of black households own, 42% of female-headed households own and 39% of Latinx households own. With this disparity, all policies on rental units are directly linked to the Fair Housing Act.

Before the Great Recession, when “exotic mortgages” were offered, we saw that black homeowners were receiving mortgages with higher interest rates than they needed but they were getting into homeownership.

Average Interest Rate
of Foreclosures
in Jefferson County, KY
January 1st to June 30th 2007
by Zip Code



From *Louisville's Foreclosure Crisis*.

Now that we are in recovery from the massive loss of ownership we see the great disparity in ownership in high relief.

The Kentucky Housing Corporation has released the state's proposed Analysis of Impediments to Fair Housing Choice for 2020 and they looked at the Home Mortgage Disclosure Act information for the state. The information is from 2015-2017. It showed that for white households, 30.7 percent of loans were denied to lower income households and 19.8 percent of loans were denied to upper income households. For black households the denial rate for lower income households was 37.9 percent and the denial rate for upper income households was 29.7 percent. For Hispanic/Latinx households the denial rate for lower income households was 33.4 percent and the denial to upper income households was 24.5 percent. Over 40 percent of the state's black households live in Louisville.

The alarming difference in denial rates for upper income black households compared to upper income white households (29.7 percent and 19.8 percent, respectively) is a call to action as that means even people with incomes are facing denials disproportionately by race and ethnicity (19.8 percent denial for white upper income households and 24.5 % denial for Hispanic/Latinx upper income households).

Figure 12: Housing Tenure

United States, Kentucky, Louisville MSA, and Louisville/Jefferson County 2016

	United States	Kentucky	Louisville MSA	Louisville/ Jefferson County
Total Households	117,716,240	1,718,217	497,174	310,355
Owners	63.6%	66.8%	66.7%	61.2%
Renters	36.4%	33.2%	33.3%	38.8%
Households by Race/Ethnicity				
White Households	81,079,480	1,506,718	396,501	224,570
Owners	71.4%	70.7%	73.7%	70.3%
Renters	28.6%	29.3%	26.3%	29.7%
Black/African-American Households	14,343,764	134,831	70,530	63,585
Owners	41.9%	36.5%	36.6%	35.8%
Renters	58.1%	63.5%	63.4%	64.2%
Hispanic/Latinx Households	14,725,771	37,970	15,596	11,259
Owners	45.8%	35.3%	39.0%	37.1%
Renters	54.2%	64.7%	61.0%	62.9%
Households by Family Type				
Family households	77,608,832	1,136,651	318,689	185,805
Married-couple Household	56,270,862	836,940	228,179	126,001
Owners	79.5%	82.5%	84.7%	81.9%
Renters	20.5%	17.5%	15.3%	18.1%
Male Household, No Wife Present	5,681,312	82,911	24,196	15,241
Owners	53.2%	57.7%	59.2%	55.4%
Renters	46.8%	42.3%	40.8%	44.6%
Female Household, No Husband Present	15,146,112	220,274	66,710	44,990
Owners	45.1%	46.9%	46.4%	42.3%
Renters	54.9%	53.1%	53.6%	57.7%

SOURCE: U.S. Census, 2012-2016 5-year American Community Survey

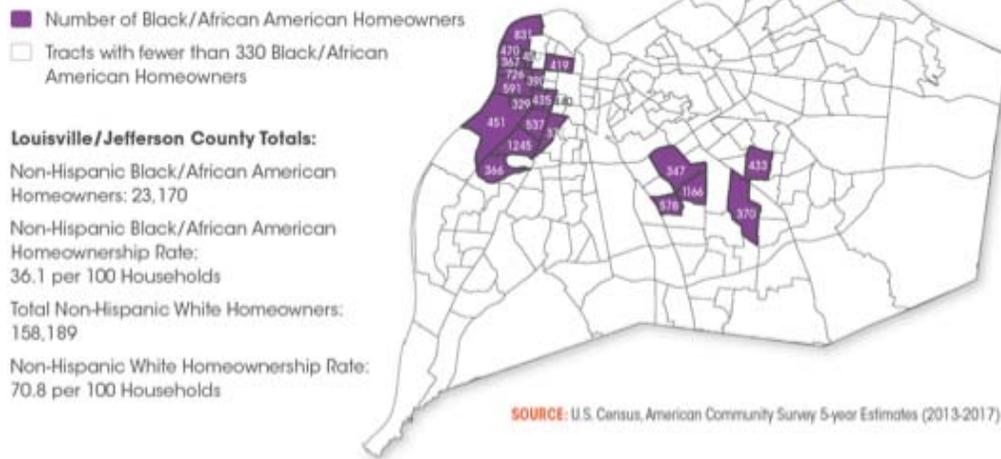
Metropolitan Housing Coalition

2018 State of Metropolitan Housing Report

Issues of access to mortgages, high insurance rates in minority neighborhoods (both for car and homeowners insurance). Issues of “replacement value” for homeowner insurance rather than just covering the mortgage and failure to acknowledge in rates the success of homeownership counseling pose real questions that affect the ability to afford a home.

When we look at ownership for black households, we see that half of all black homeowners live in only 22 of 198 census tracts. Looking at those tracts in the other maps of our city, we see some concentrations by other factors as well.

Map 2: 22 Tracts Containing 50% of Total Black/African American Homeowners in Louisville/Jefferson County (2017)

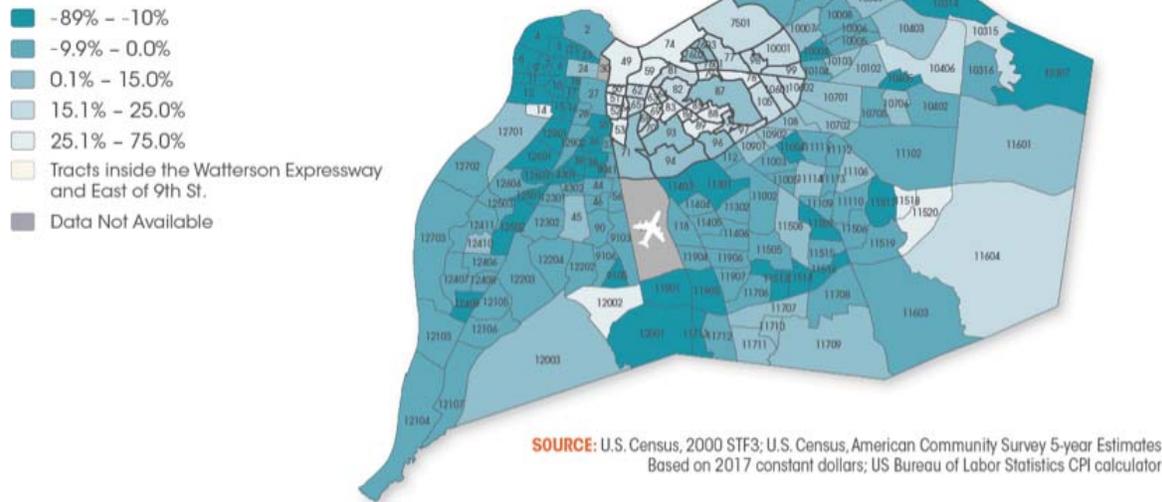


Even more disturbing, the map below displays the geographic distribution of change in the rates for black homeowners from 2000-2017 across Louisville/Jefferson County. The rate of homeownership for black households declined in over half of all tracts (54%). These tracts are dispersed throughout Louisville/Jefferson County, highlighting that black homeownership decreased all over the county. But it is in West Louisville that we take note of the decrease in black ownership, as that is where the most intense racial segregation is still occurring. For example, in parts of the Portland neighborhood, the rate of black homeownership has dropped from 53.6% to 29.7%. Census tract 7.00, which includes parts of Shawnee neighborhood, the population remained over 90% black, from 2000-2017, but the black homeownership rate declined from 56.2% in 2000 to 44.7% in 2017. This is a trend that needs to be studied to know why this occurs.

Map 3: Change in Black/African American Homeownership 2000-2017 by Census Tracts – Louisville/Jefferson County



**Map 1: Change in Median Home Values
2000–2017**
by Census Tract – Louisville/Jefferson County



The American Community Survey, a rolling update of the Census, shows that areas with the highest poverty levels are also the same areas with the highest concentrations of subsidized housing, the greatest number of health problems, the least access to healthcare, the greatest concentrations of protected classes, most notably African Americans, and the greatest number of foreclosures and vacant properties. This illustrates that race, gender, disability, poverty, poor housing conditions, and poor health conditions are concentrated in the same areas of the county. Comparison maps show that little progress has occurred on a macro scale.

The areas that repeatedly emerge as over representing high poverty, adverse environmental outcomes and concentrations of protected classes are: the western portion of the city, which contains a predominance of older housing stock; the first ring or older suburbs located south of the downtown; and west of the fairgrounds and airport, and the Newburg area. The maps that accompany the AI continually highlight these areas.

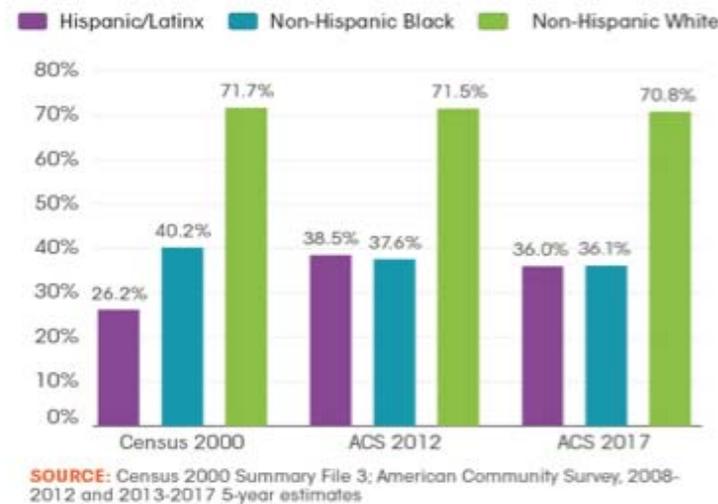
Additionally, the 2016 American Community Survey shows that 14.3 percent of all Jefferson County residents had incomes below the federal poverty level. With the COVID-19 safety measures resulting in loss of employment, there will be a surge in that percent which will be temporary but may leave some additional households in long term poverty. As the above chart shows, the poverty rate by race is very disparate.

While some segregation can be linked to individual attitudes of protected classes who desire living near persons with similar characteristics, such as race, color or religion, extensive studies confirm that actual levels of segregation are far greater than would be expected if this type of “self-segregation” were the defining factor in segregation. The data suggests that groups of people live together not by choice, but rather by not having any other choice.

Homeownership represents a family’s largest investment and hence, it has long been an important economic indicator. Tracking rates in 2000, 2011 and 2017, homeownership in the Louisville MSA saw a 10-year low in 2011, with a rate of 61.7 percent.

While white households lost less than one percent of their almost 72 percent ownership rate of the year between 2000 and 2017, black households dipped to a 36 percent ownership rate in 2017 from a 40.2 percent ownership rate in 2000. That is a 10 percent loss in the ownership rate. Hispanic/Latinx households fared much better, increasing the ownership rate of 26 percent in 2000 to 36 percent in 2017. This is still well below the white homeownership rate, but studying the successful increase may give instruction for successful programs.

Figure 3: Homeownership Rates by Race/Ethnicity
Louisville/Jefferson County, 2000, 2012, 2017



Inadequate Housing Stock

A definitive assessment of housing needs in Louisville was conducted and published in February 2019, identifying that Louisville needs an additional 31,412 units affordable to people at or below the federal poverty level, Louisville Housing Needs Assessment. This report is so detailed, it must be considered a companion piece to the Analysis of Impediments to Fair Housing Choice. However, some of the information will be included in this section.

In recognizing that poverty is over-laid with concentrations of protected classes, it is not startling to see that people are cost burdened by housing itself. The areas with high concentrations of protected classes have the oldest housing. Much of this housing was built before 1950, when the first regulations limiting lead appeared nationally and the vast majority was built before the ban on lead in paint in the late 1970s. Moreover, most homes were built before 1980 when the building code began requiring insulation. The cost of heating a home in a house that is not properly insulated is tremendous, especially since the cost of heating fuels has risen faster than the median income. Additionally, housing that is older requires maintenance that is costly or the units become dilapidated and are in violation of housing codes and regulations.

One of the fundamental barriers to fair housing choice is the failure of the market to renew the supply of housing in a manner sufficient to the needs, preferences and purchasing power of low-income households. As a consequence, a very large number of these households must dwell in housing stock either inadequate in terms of minimal standards of quality; or in an unsafe or otherwise unsuitable location; or for a cost beyond the reasonable means of the

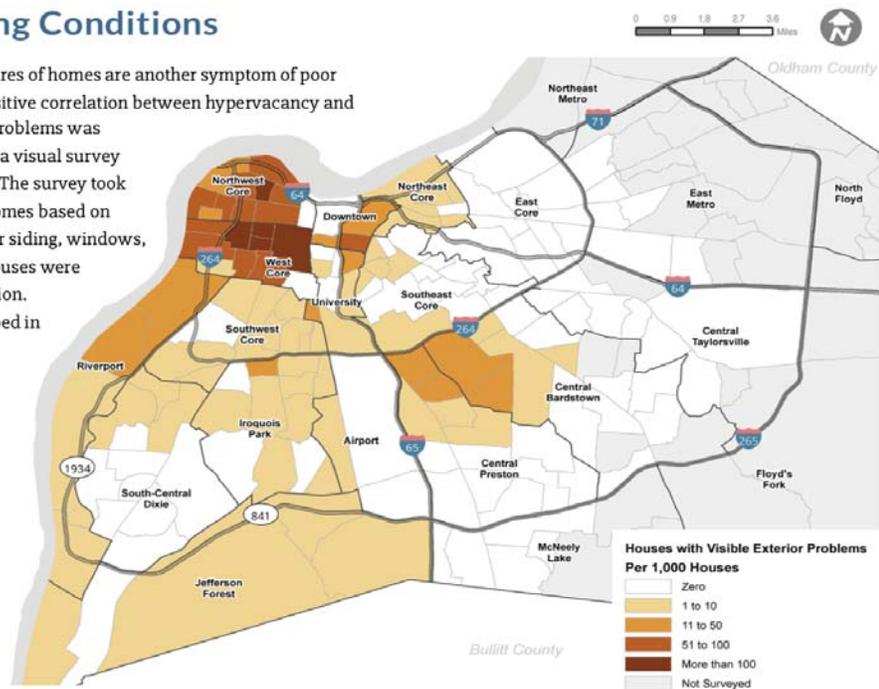
household. In the latter case, disproportionately high housing costs require that the household reduce expenditures on other necessities, and otherwise increase the probability of eviction, foreclosure, transience and household instability.

A possible impact on rental stock is the short-term rental industry which has removed units from the long-term rental stock and replaced it with under 30 day residency. This trend has been addressed by ordinance, but it bears continued oversight over the next five years.

The Housing Needs Assessment has a map of Exterior Housing Conditions that took inventory of homes based on visible problems related to their siding, windows, roofs or foundation. Boarded houses were considered to be in Poor condition. This map also shows that those in protected classes are living in poor conditions.

Exterior Housing Conditions

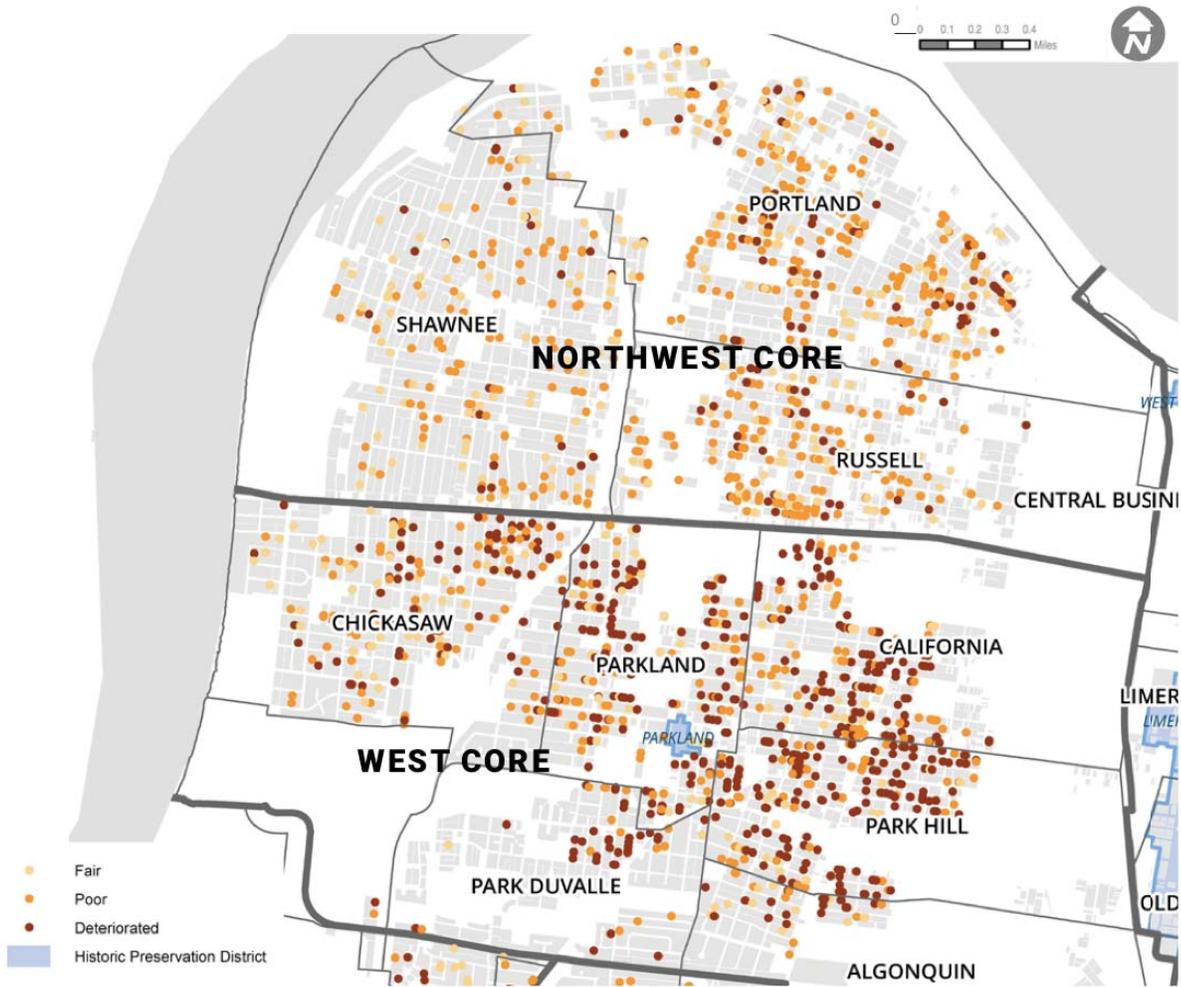
Problems with physical structures of homes are another symptom of poor housing market health. The positive correlation between hypervacancy and frequency of exterior housing problems was identified in Louisville through a visual survey conducted throughout the city. The survey took inventory of the condition of homes based on visible problems related to their siding, windows, roof, or foundation. Boarded houses were considered to be in Poor condition. The full methodology is described in the Appendix.



Map 17: Exterior Housing Conditions, 2018

Source: Mullin & Loneragan Associates

As we look in depth in the western core of Louisville, using the Louisville Housing Needs Assessment we can see these areas contain the highest concentration of deteriorated houses. The Northwest Core in the map below has fewer deteriorated homes, but it also had the highest rates of boarded homes. “Over half of the West Core parcels that exhibited issues were deteriorated.

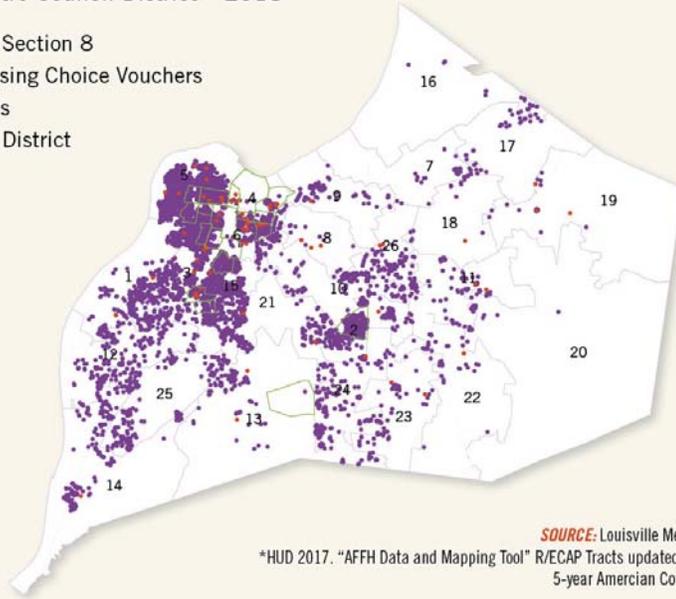


Map 19: Conditions in Northwest Core and West Core

These areas are also where over-concentrations of Section 8 Voucher contract are located, although these units are inspected for conditions. This is because these are the areas with the largest number of units that are both rental and meet the Fair Market Housing limits of the subsidy program.

Map 7: Subsidized Section 8 Housing
by Louisville Metro Council District – 2018

- Project-Based Section 8
- Section 8 Housing Choice Vouchers
- R/ECAP* Tracts
- Metro Council District



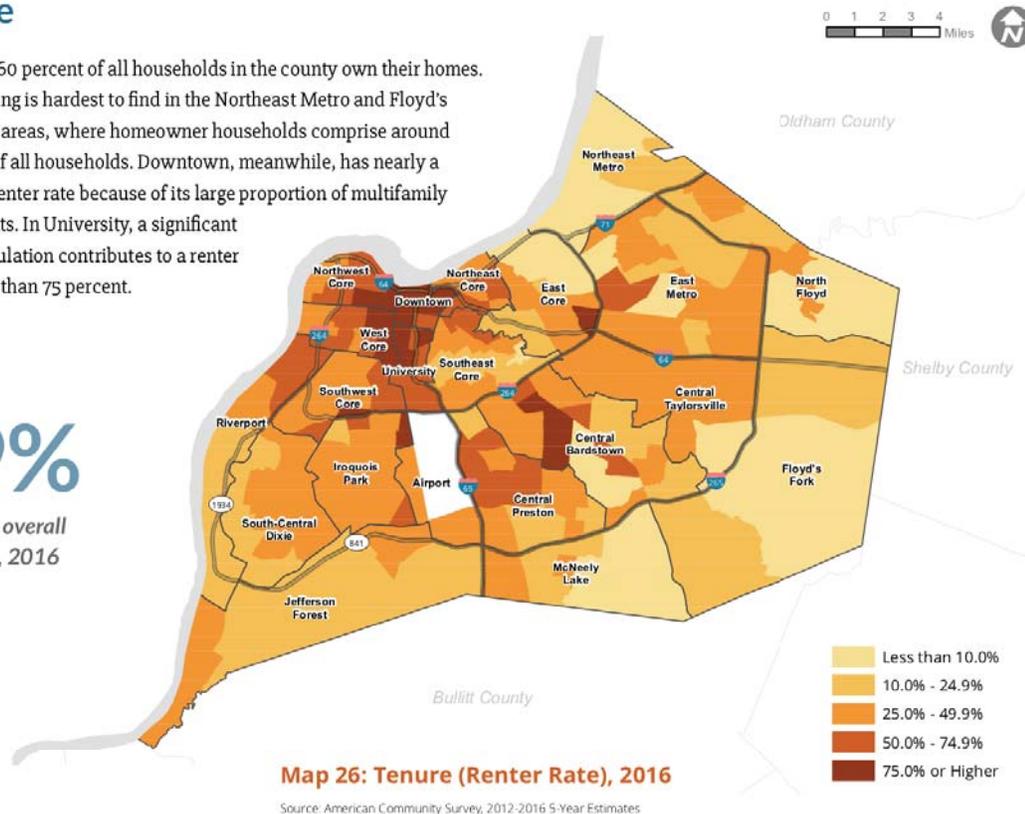
SOURCE: Louisville Metro Housing Authority
*HUD 2017, "AFFH Data and Mapping Tool" R/ECAP Tracts updated to reflect 2009-2013
5-year American Community Survey data.

But the Renter Rate in parts of west Louisville can be steep, with some areas with over 75 percent rental housing.

Tenure

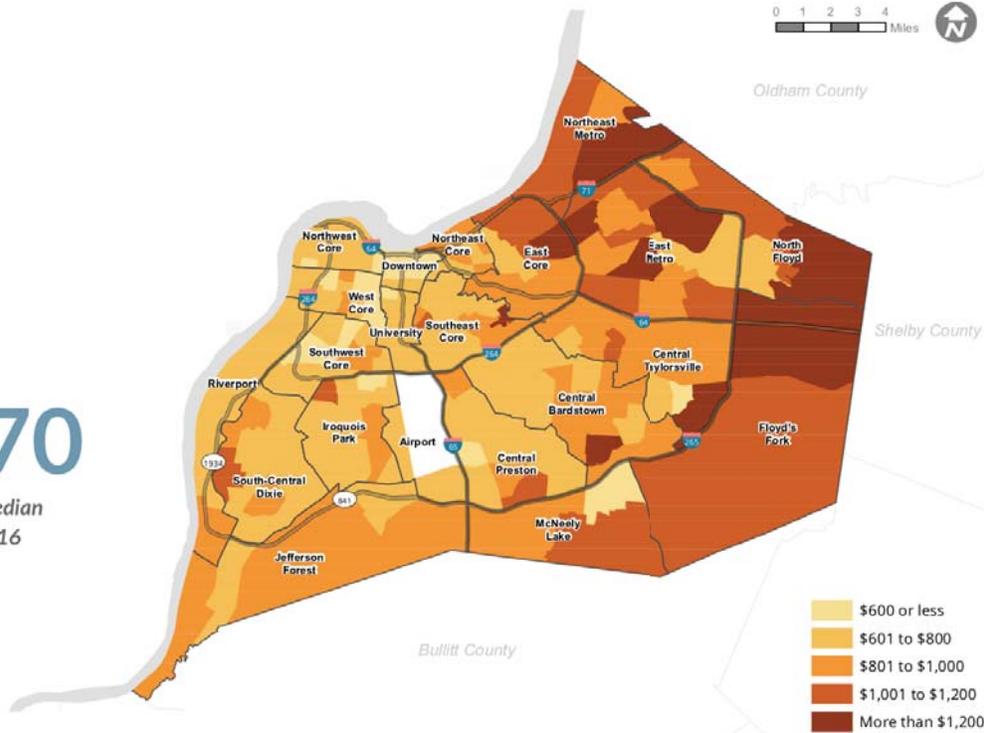
A little over 60 percent of all households in the county own their homes. Rental housing is hardest to find in the Northeast Metro and Floyd's Fork market areas, where homeowner households comprise around 90 percent of all households. Downtown, meanwhile, has nearly a 90 percent renter rate because of its large proportion of multifamily developments. In University, a significant student population contributes to a renter rate of more than 75 percent.

39%
Louisville's overall
renter rate, 2016



And as we look at where the lowest rents are, there is a concentration. This is where those with lowest incomes need to seek rental opportunities and since race and gender and ethnicity are linked to higher poverty rates, the low rent opportunities will cause segregation.

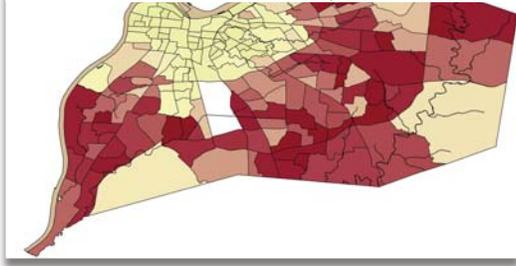
\$770
 Louisville's median
 gross rent, 2016



Map 28: Median Gross Rent, 2016

Source: American Community Survey, 2012-2016 5-Year Estimates

PERCENT OF HOUSING UNITS BUILT BEFORE 1950, BY CENSUS TRACT. YELLOW INDICATE HIGHEST PERCENTAGE; PURPLE LOWEST. (SOURCE: 2009-2013 AMERICAN COMMUNITY SURVEY)



Housing is part of our basic infrastructure and value of a city. Upkeep is part of maintaining infrastructure and value. Much of the housing stock built prior to 1950 and in some areas it is preserved and quaint and in other places it is deteriorated. But this housing stock is in Louisville's unique neighborhood character, so careful consideration of preservation is important as is making sure we are not poisoning our children with poor conditions. While the home construction industry annually produces new units to replace or to substitute for units already existing in the metropolitan inventory, it could not be said that this production matches perfectly

the depletion or obsolescence of the supply across the full spectrum of the market. Put briefly, builders "build for the market," providing a product that will sell for a reasonable profit to a consumer with the means to finance and purchase the product. Because this model depends to a very large extent upon the potential profitability of the enterprise and the corresponding probability of purchase by a qualified consumer, home builders are naturally inclined to focus upon that segment of market demand where there is the least risk involved, i.e., to build for the market for whom there is the highest probability of successful sales or rental within a reasonable period of time and with a reasonable return on investment.

The rehabilitation and production of "affordable" housing is associated with a host of parameters that increase the builder's risk and decrease the likelihood of a reasonable return on investment; which has therefore ceded the

endeavor largely to governmental entities (e.g. public housing authorities) and non-profit community development organizations – entities motivated by a social purpose and not constrained so much by the risks associated with the production and sale of homes in the private market.

Based upon public housing authority waiting lists for housing assistance (the current Moving to Work Plan out for review lists over 8,000 households as on the waiting list for Vouchers, 5,225 households on the list for conventional public housing and over 3,000 households on the list for Moving To Work replacement housing); upon the number of ostensibly inadequate housing units found throughout the older urban neighborhoods of Louisville, as illustrated; and upon Census data indicating the number and percentage of households paying a disproportionate share of their income (i.e. over 35%) annually for housing costs, it seems reasonable to observe that there is an insufficient supply of adequate and affordable housing in metropolitan Louisville relative to the demand. It is not that poor people are necessarily content with living in structures that are arguably in a condition inadequate, obsolete or unaffordable; it is to say, instead, that the supply of decent, standard, and affordable housing is insufficient relative to the demand. Indeed, the Housing Needs Assessment estimates that over 32,000 new units at a rent affordable to those at or below 30% of median income are necessary to meet the demand of Louisville households at that income level.

It is incumbent on government to prevent the deterioration or obsolescence of older housing stock in areas that do not attract market involvement. Principles of preservation, sustainability, neighborhood character and safe, energy efficient housing are those that are on track to be a part of the new Comprehensive Plan for the built environment. Offering innovative financing, incentives and subsidies to ensure that housing stock does not deteriorate, especially in areas where there has been a loss of real estate value, is necessary to provide more choice for those in protected classes. This, combined with changes to the Land Development Code, will offer a balance of improving choice in areas that are impacted and offering choice in areas that have used legal barriers to prevent affordable housing.

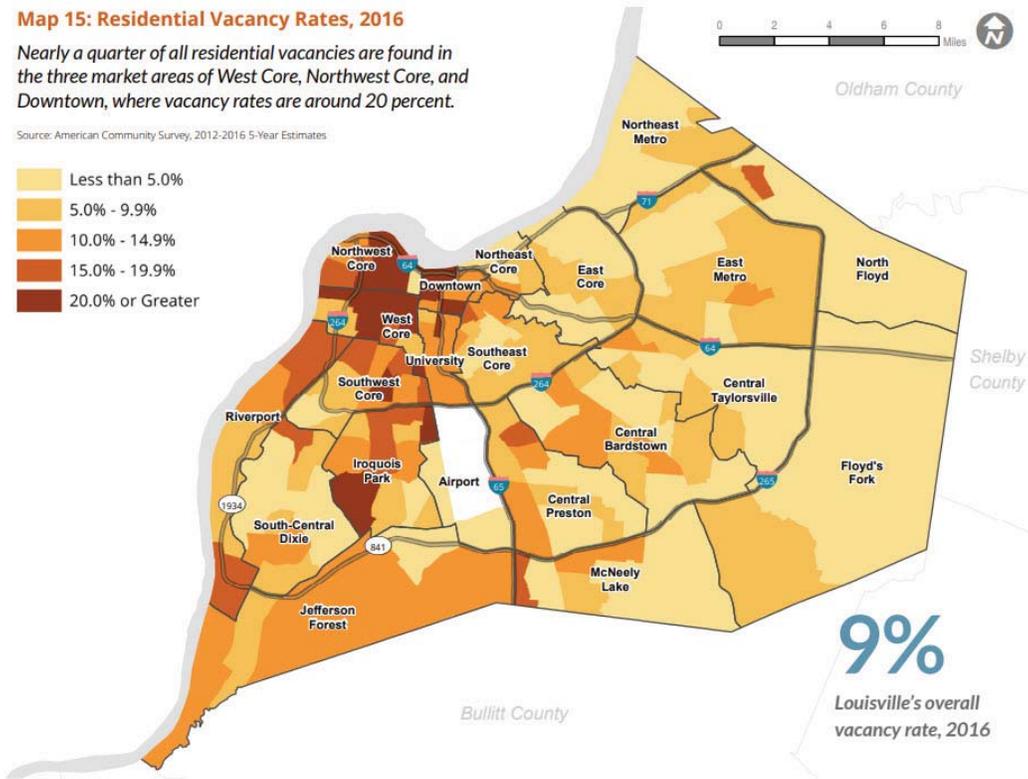
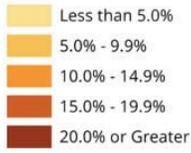
Vacant Properties

Vacant and abandoned properties became an issue with the Great Recession, where the burden of foreclosures, spread everywhere, fell largely to west Louisville, home to many households in protected fair housing classes.

Map 15: Residential Vacancy Rates, 2016

Nearly a quarter of all residential vacancies are found in the three market areas of West Core, Northwest Core, and Downtown, where vacancy rates are around 20 percent.

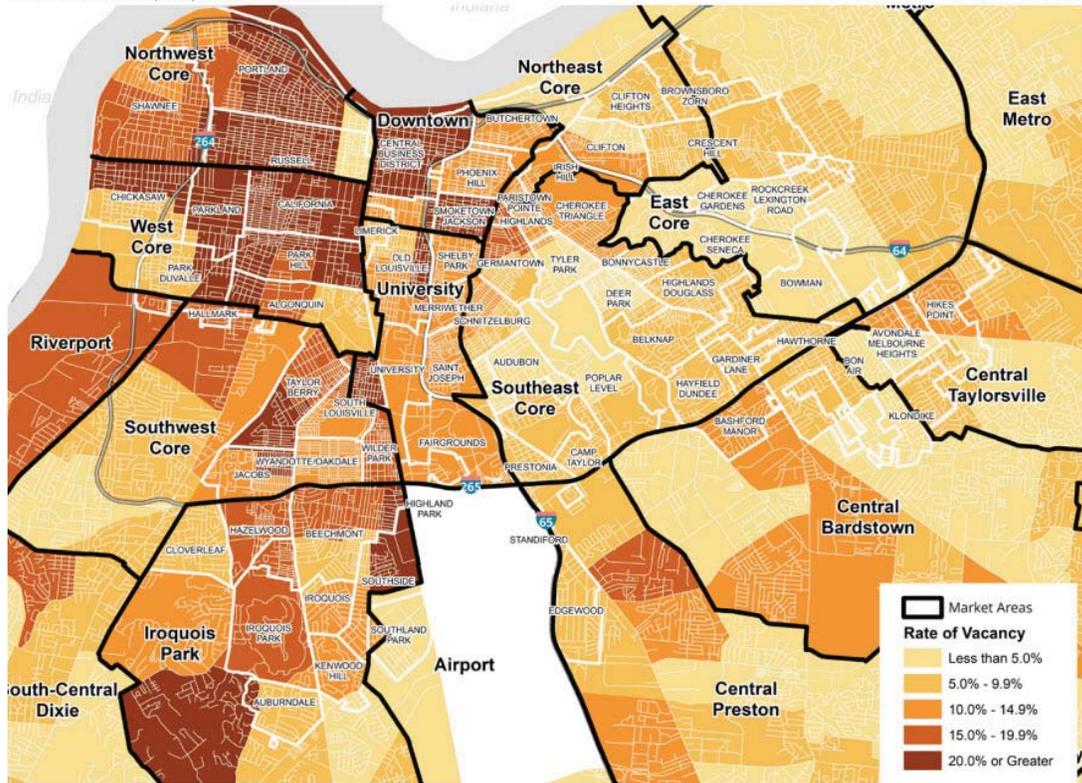
Source: American Community Survey, 2012-2016 5-Year Estimates



9%
Louisville's overall vacancy rate, 2016

Map 16: Vacancy Rates in Urban Neighborhoods, 2016

Source: American Community Survey, 2012-2016 5-Year Estimates



Bringing reuse to these properties, as well as preventing more vacant and abandoned structures has been a massive undertaking with Louisville Metro staff assigned to this task. The effect of vacant properties on real estate prices, the cost to keep lawns mowed and structures boarded are a drain on the both the city and the real estate value of owners in these areas. Real estate values in many of these neighborhoods rose in 2019 in the Property Valuation assessments for the first time in over a decade.

Public Housing Displacement

There have been five major public housing projects torn down in Louisville and three have had some or all units replaced. Cotter and Lang Homes has become Park DuValle, Clarksdale has become Liberty Green, Sheppard Square, Beecher Terrace is being replaced and Iroquois Homes was torn down without substantial replacement. Park DuValle did not do a one-for-one replacement of units. Sheppard Square was begun in 2013 and was rebuilt into almost 400 units that have energy star rated appliances and used green building techniques. New units were available in 2014. While this HOPE VI project was not done in the 2015-2020 time frame, it was an example of best practices that will carry on in the Choice Neighborhood revitalization of Beecher Terrace.

Two things have happened as a result of this work: fewer units for families exist and most of the replacement units for families have restrictions, including income restrictions. Care is being taken in Beecher Terrace to allow more displaced households to return, but it will still be a fraction of those moved out.

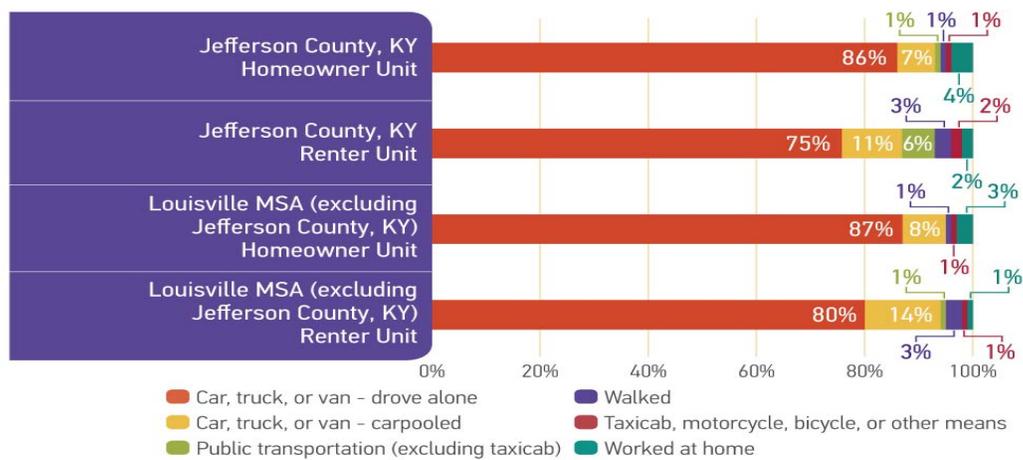
In all of these projects the overwhelming racial identification was black, so did the razing of the projects and the ability to move using Section 8 result in greater racial integration? The maps show not. More often was the result that poor black families moved into areas that were black, despite great efforts to help families relocate. Clearly, race was more of a determinant in where people relocated than class. Poor white areas did not see a substantial uptick in racial integration as families from the razed projects relocated. More study is needed.

In the 2015 AI, this was included “Currently there is a planning grant for a fifth project, Beecher Terrace. As part of the plan, there needs to be a study of the impact of changing or razing the project on current residents, on neighborhoods that are black and on true housing choice.” Extensive studies were done on how the work would impact the community both before and during the work.

Transportation

The Metropolitan Planning Organization governing Louisville/Jefferson County and five other counties in both Kentucky and Indiana is called the Transportation Policy Committee (TPC). The constitution of this body denies proportional representation to African Americans and gives greater voting power to suburban areas over urban areas. Louisville gets one vote on the TPC and it represents 741,096 persons of whom about 23% are African American or two races. Other, smaller cities within Jefferson County get a full vote, for instance. The time and place of the TPC and supporting committees exclude participation by those using public transit and these meetings are not shown as they occur but can be viewed on the website for the Kentuckiana Regional Planning and Development Agency.

Means of Transportation to Work by Tenure Workers 16 Years and Older 2012



SOURCE: U.S. Census Bureau, 2010-2012 American Community Survey

Louisville government has a plan, *Move Louisville*, which is solely about a vision of transportation in Louisville. This includes public transit, services to allow people not to travel or to economize on travel as well as roads and other modes of transportation. This was done separately from the TPC and Move Louisville is instrumental in TPC decision-making. However, Move Louisville presents a strong case for the efficacy of public input and creates the opportunity for Louisville to be a leader in transportation planning.

The 20-year Move Louisville plan includes proposals for 16 projects and various maintenance and upgrades. It calls for a shift in how people move around the city — in short, fewer cars and more bikes, sidewalks and buses. This plan is the blueprint for how local dollars are spent, as well as federal dollars. One example of success is the Dixie Highway Corridor which include BRT – bus rapid transit. See the full plan at

https://louisvilleky.gov/sites/default/files/advanced_planning/movelouisville_april2016draft.pdf

Not in My Back Yard (NIMBY) Mentality

Since 2015, Louisville Metro became the defendant in a fair housing case, *LDG Multifamily, LLC v. Louisville/Jefferson County Metro Government and Prospect Development, LLC*. This is the second time that Louisville Metro government has been the defendant in a fair housing case because the local government voted against affordable housing or shelter units from being built.

NIMBY is an acronym that stands for “not in my backyard,” that is often used to describe a neighborhood association’s objection to a proposed development in their proximity. This attitude is often characterized by residents’ fears and prejudices about certain types of developments, such as affordable or low-income housing, which they worry will negatively affect property values or change the character of their neighborhood.

NIMBYism is viewed as a major impediment to fair housing choice in many localities because local governments often advocate the stance of NIMBYs in determining land-use laws and zoning practices. The Comprehensive Plan is the guiding policy document for land use. The expired Comprehensive Plan in place for most of the time between 2015 and 2020, *Cornerstone 2020 Comprehensive Land Use Plan*, never had fair housing and/or affordable housing as explicit goals. The new Comprehensive Plan does contain, for the first time, a section on housing with principles of

fair housing and affordable housing. It has yet to be reflected in the actual land use laws, the *Land Development Code* (LDC), but plans to update the LDC are underway.

This NIMBYism has real and current consequences. Between 2000 and 2017, the overall homeownership rate of Shively decreased, from 69.8 percent to 61.8 percent. In fact, Shively's homeownership rate dipped to 60.1% in 2012, when the worst effects of the Great Recession were felt, but increased a percent by 2017. But there was a very large change in who owns the homes. Of all homeowners, the percent that are black went from 39% to 66.7% and the percent that are white went from 60.9% to 33.3%.

The real median income of all households decreased between 2000 and 2017 (with the biggest dip in 2012, but recovering by 2017). Shively households went from a median income of \$45,673 in 2000 to \$34,963 in 2012, recovering to \$36,525 by 2017. With an increasing median income, the property values should be recovering as well. The mystery is why property values continue to decrease in a way that is different from elsewhere.

NIMBYism is often concerned with property values. This view automatically reinforces a pernicious discourse that views certain people as deficits to neighborhoods and encourages the exclusion of some in a mistaken belief that this is needed for those neighborhoods to function economically.

Studies have shown that affordable housing has no demonstrable effect on property values when:

1. Sites are chosen in healthy, vibrant neighborhoods.
2. The structural design of the housing does not change the quality or character of the neighborhood.
3. Affordable housing is dispersed.

The likelihood that affordable housing will negatively affect property values increases when:

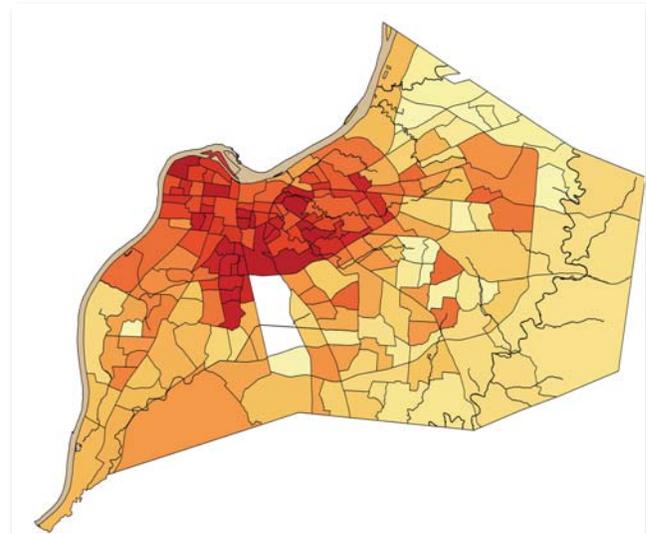
1. The quality, design and management are poor.
2. Affordable housing is located in disadvantaged neighborhoods.
3. Affordable housing is highly concentrated.

Role of the Land Development Code and Its Affects to Impediments

The Redlining Project, found at <https://louisvilleky.gov/government/redevelopment-strategies/redlining-community-dialogue>, shows the intended negative racially rated lending criteria of 1937, but goes further by overlaying today's map to show how pervasively adhesive these lending practices remain. Also, Louisville acknowledged the 100th anniversary of *Buchanan v. Warley*, 245 U.S 69 (1917) which was a U.S Supreme Court case overturning Louisville government's zoning by race. Louisville then sought a permissible way to segregate by race and codified economic zoning, a system that still is in place and the maps below will show is very accepted.

The city of Louisville instituted a zoning code designated by race. This was overturned in 1917 *Buchanan v. Warley*. However, Louisville went on to use a proxy to keep segregated, economic zoning and this zoning is the basic system of Louisville/Jefferson County. Louisville/Jefferson County established these planning and zoning codes in the 1940s. As the maps have shown, it has been enormously successful in keeping Louisville segregated. These codes followed earlier zoning patterns that were used throughout the country to guide development. These codes were designed to separate land use between commercial, residential and industrial districts.

Following the population growth after World War II and the development of the interstate highway system, most of the undeveloped land throughout Jefferson County was zoned residential to enable subdivision developments to be built without having to file for a zoning change. Most of this land was zoned single-family residential and required minimum square-footage lot standards on single-family, detached homes. For instance, a one-story single-family home in Prospect must be at least 2,500 square feet. The patterns of residential growth and zoning codes have served to limit housing choice within the Louisville area. 75 percent of all the land in Metro Louisville is zoned residential, with 69 percent of this land zoned R-4, which requires that homes be built on lots no smaller than 9,000 square feet or have 4.84 dwellings per acre. There are few, if any, R-4 lots within the old City limits. These zoning classifications have not been updated since the 1940s and serve as a remnant of the prevailing attitudes and policies of that era, which continue to promote economic and racial segregation. The vast areas and location of land zoned R-4 limits housing choice for a large percentage of the population. For instance, people who live in multifamily apartments instead of single-family dwellings are excluded from over half the residential land in Louisville Metro.



DENSITY OF EXISTING HOUSING UNITS BUILT BEFORE 1950. REDS INDICATE HIGHER DENSITIES, YELLOW THE LOWEST. (SOURCE: 2009-2013 AMERICAN COMMUNITY SURVEY)

In Louisville homeownership is at 70% for white households and at 36% for black households. Therefore laws (such as zoning) and policies (such as homeowner association agreements) that exclude those who are not homeowners, especially zoning, present a legal barrier to racial diversity.

The American Planning Association (APA) addressed this form of housing discrimination in its *2006 Policy Guide on Housing* by stating:

“Too many people who are members of racial or ethnic minorities, who are disabled, or who live in non-traditional household types confront discrimination in the housing market. Traditional zoning and planning and other land use controls may limit the supply and availability of affordable housing, thereby, raising housing prices. The regulatory environment plays a crucial role in housing production. Large lot zoning, restrictive single-family definitions, minimum square footage for single-family homes, housing location policies, expensive subdivision design standards, prohibitions against manufactured housing, time-consuming permitting and approval processes are some examples of policies and regulations that constrict the development of affordable and supportive housing.”

The APA recommends identifying regulatory policies that may be noncompliant with the Fair Housing Act, updating zoning codes to address new demographic trends, and expanding the range of housing choice for all income groups.

Comprehensive Plan and the vision of Louisville's built environment

In 2019, Louisville and Jefferson County replaced its 19-year-old comprehensive Cornerstone 2020. This new plan outlined its housing goals around determining housing needs and preventing barriers to affordable housing. The Land Development Code (LDC), however, the only place where the LDC addressed the goals of affordable housing is in Chapter 4, Part 5: Alternative Development Incentives (ADI). In the past, Louisville favored incentives as the way to promote diverse housing at different price and rental points. Inclusionary zoning requires developers to make a certain percentage of the units within their market rate residential developments available at prices or rents that are affordable to specified income groups or offer incentives that encourage them to do so. Adopting mandatory inclusionary zoning ordinances are an assurance that affordable housing options are a part of any residential development, regardless of its location within the county; in other words, it levels the playing field. Under mandatory inclusionary zoning, developers are required to dedicate a set percentage of units in any new residential development for low-and moderate-income households. If such a program were in place in Louisville Metro, the overall effect could be an expanded diversity of housing choice, ending the historic segregation and isolation of poverty within the community.

The COVID-19 Crisis

Everyone involved in this report is working from home. Many Louisvillians have been laid off and many more have little or no savings to fall back on. While there is a state issued moratorium on filing or hearing cases and on executing Eviction Set Out Orders, one day this moratorium will end. This is equally true for Louisville Gas and Electric utility shut-offs, currently under a moratorium from the Kentucky Public Service Commission.

There are many efforts at the federal, state and city levels of government to help ease the financial burden of those experiencing a loss of both income and a job, these efforts have limits. Our residents have been generous and our non-profits have worked tirelessly to provide services. But there will be debt.

We are all looking at new ways to communicate, e.g. the Jefferson County Public Schools doing on line education which entailed getting pads to lower income households and to households who are not proficient in English

Louisville Metro Government has long been working on the technology and connectivity gap, but this gap is exponentially more exposed and important in this crisis. It is possible that more services and jobs will rely on technology.

While Louisville has, through good guidance, been responsive to the need to isolate, other cities such as Detroit, Chicago and New Orleans have shown the disparate negative outcomes of this disease by race. We will be looking to see if segregation and the attendant problems listed in the body of this report are culprits in this disparate outcome.

A short-term targeted plan to address the fair housing issues in this crisis is below:

Develop a plan for renters who have not paid rent- include assistance, negotiation for payment plans

Develop a plan for those who have not paid utilities- include assistance, negotiations for payment plans

Develop a plan to advise small business landlords who have not paid their mortgages

Once we can get out again:

Have job fairs to get people employed

Be ready to utilize the infrastructure bill being developed in Congress to have projects that can take place and employ local people. Identify projects that are “shovel ready”.

Technology improvements and access to basic systems at a pad or computer level, not just cell phones.

Have connectivity plans that are inexpensive.

Review of 2015 Impediments to Fair Housing Choice Plan

2015 Identified Impediments taken from Louisville Metro 20-Year Action Plan to Further Fair Housing

Work to achieve these goals

Government Commitment to Fair Housing

- **Action Steps to be completed in 3 years**

1. Have a clear policy that states that fair housing is a mandatory lens for review of all actions by all parts of government using a Fair Housing Assessment which is developed and coordinated by a designated body.
2. Designate authority to a Louisville Metro agency or department to oversee implementation of actions steps of the 20 Year Plan.
3. Begin a market analysis to assess housing demand, including, but not limited to, demand for rental as well as ownership, areas where there will be housing demand and type, price and rental cost points, expected demographics, expected job centers.
4. Continue to provide mobility counseling and assistance for Housing Choice Voucher recipients to identify options and negotiate with landlords in areas with few households renting using Housing Choice Vouchers, especially in areas where the Louisville Metro Housing Authority has established Exception Rents.
5. Encourage the Louisville Metro Authority to use data of the market analysis and the Fair Housing Assessment in determining the configuration of one-for-one replacement of public housing units unless in conflict with the requirements of the U.S. Department of Housing and Urban Development.
6. Engage Jefferson County Public Schools in planning and discussions on how to create housing opportunities for households in protected classes throughout Jefferson County. Encourage JCPS to designate a representative for housing planning.
7. Discuss with the Kentucky State Department of Insurance mechanisms to be put in place to lower private homeowner insurance costs for purchasers who have participated in home ownership counseling with personal finance counseling.

Outcomes:

- The Housing Needs Assessment is a major achievement of great importance and completed.
 - The Housing Needs Assessment has had an influence on Louisville Metro Housing Authority in replacement housing strategy.
 - The Fair Housing Assessment definitely was begun but has not had the implementation promised. However, with the Health Equity Assessment tool of the Department of Public Health and Wellness, there has definitely been a widening of awareness by all departments of the impact of the built environment on health.
 - The Office of Chief Equity Officer was established, but the coordination of achieving the goals of the AI were not consolidated under that office, but it does present an opportunity.
 - No advancement on bringing equity to insurance at the state level.
 - Jefferson County Public Schools has committed to equity, but there is not a chief liaison for creating housing for the families in severe housing instability. Instead they rely of the overtaxed resources that all residents use.
- **Action Steps to be completed in 4-7 years**
 1. Continue to educate government officials and workers and those on boards appointed by Louisville Metro government about fair housing, protected classes, and how decisions can have consequences for protected classes.
 2. Evaluate for cost impact and feasibility, including time delays, all fees and costs that are controlled by Louisville Metro government to see if they can be waived for creating or rehabilitating low-income housing in low-impact areas or to waive fees for projects that will positively impact housing value in areas with concentrations of households in protected classes.
 3. Continue to assess all boards appointed by government to ensure that people in protected classes are represented through the appointments process and take affirmative steps to ensure such appointments when they are not present.
 4. Dialogue with the Kentucky Attorney General's office on a program that eliminates lending practices that prevent households in protected classes from receiving the best lending products, insurance products and developer products.

Outcomes:

- The public has had a major influence on government awareness about fair housing, but the government has taken action in light of that education. Louisville CARES and funding for the Louisville Affordable Housing Trust Fund have been significant responses.
- Louisville Metro was sued about representation on the Planning Commission. This contributed to the desire to bring better representation on boards.
- The evaluation of cost impact and ability to waive city fees to create or keep housing affordable has happened, but not systematically, but by creativity of individual departments or persons. This clear ability of staff to do this task should be rallied and be more systematic.
- Lending advocacy with the Kentucky Attorney General's office has not been conducted.
- Other efforts to raise the issue of housing discrimination included and exhibit on segregation that was in the main Louisville Free Library building which included an

example of restrictive covenants which were not fully outlawed until 1972. And Louisville acknowledged the anniversary of the firebombing of the Wade family, a black family wanting to move to the suburbs in the 1950's and the prosecution of the Braden family for assisting the Wade family in purchasing a home in exclusively white Shively.

- **Action Step to be completed in 8-20 years**

1. After eight years, institute biennial reviews of the 20-Year Plan to add and update steps and to mark progress in accomplishment.

Outcome:

- The new Comprehensive Plan is a major achievement in including goals for fair housing as well as affordable and safe housing. The Plan is new, and the Land Development Code has not been updated to match these great goals (including the goal of Healthy Louisville 2025 and the commitment for a senior friendly city), but there is a strategy for doing this in place and being conducted. Inclusion of regular reviews to see if goals are being achieved should be included.

Community Education and Engagement

- **Action Steps that are ongoing over the whole 20-year plan**

1. Launch and sustain a public education campaign with prominent community leaders on this 20-Year plan—focusing on its values and the steps that apply to their respective constituencies.
2. Hold at least one community group meeting each year that focuses on the 20-Year Plan and solicit input from the community on new steps and in help achieving current steps.
3. Continue the Fair and Affordable Housing informal industry group meetings, including the Home Builders of Louisville, Louisville Apartment Owners Association, the Board of Realtors and advocacy groups along with appropriate governmental departments.
4. Ensure continued training opportunities for members of private industry sector who are engaged in housing—e.g., home builders, mortgage lenders, realtors, landlords, leasing agents, insurance brokers.

Outcomes:

- Through the public input on the Comprehensive Plan, a great deal of community input was taken and led to policy changes, it was a very thorough outreach. Many meetings were held.
- There was an attempt at balance in the community governing group for the Comprehensive Plan, but there was little commitment from the groups not in the building industry, yet the committee did not have rules on a quorum or make changes for non-attendance. Consequently, the group was dominated by building industry people.

- **Action Steps to be completed in 3 years**

1. Formalize a community education program about the benefits of diversity.

Outcomes:

- This has not been done by city government, but the Chief Equity Office may be able to achieve this.

- **Action Steps to be completed in 4-7 years**

1. Educational materials will be provided in multiple languages, including Braille on the Uniform Residential Landlord and Tenant Act.
2. Provide home ownership counseling materials (for both purchases and mortgage protections) in multiple languages, including Braille.
3. Create fair-housing choice literature in multiple languages, including Braille, that would provide information as to the availability of affordable housing and special-needs population housing throughout the Louisville Metro jurisdiction.
4. Distribute information on programs and housing opportunities at Neighborhood Place sites, English as a Second Language (ESL) course sites, ethnic restaurants where both clientele and workers are often immigrants and internationals, houses of worship that conduct services in congregants' language of fluency, and radio stations and print media in consumers' language of fluency.

Outcomes:

- Some limited access, but done through community groups. This is good and should be supported by government.

Built Environment: Specifics for government review and action

Coordination

- **Action Steps to be completed within 3 years**

1. Establish coordination of all aspects of the built environment to further fair housing.
2. Work through the Vision Louisville process to have a comprehensive approach.

Comprehensive Plan and Land Development Code

Studies have shown that economic segregation perpetuates lack of economic mobility, locking those in protected classes into static (mostly lower-income) economic strata. The Comprehensive Plan and Land Development Code, as currently proscribed, has effectively excluded those in protected classes, who are disproportionately low-income, from many geographic areas of residence. The way land use is assigned is basic to whether affordable housing can be developed, and affordable housing is a prime tool in expanding fair-housing opportunities.

- **Action Steps to be completed within 3 years**

1. Amend the Comprehensive Plan to include goals and objectives to expand housing choice and to specifically reference fair housing as one of its goals.
2. Mandate that a Fair Housing Assessment be part of any submission to the Louisville Metro Department of Planning and Design for residential development.
3. Amend the Land Development Code to include incentives for affordable housing.

Outcomes:

- Goals in the Comprehensive and Strategic Plans are regularly reviewed via the LouieStat meetings initiated with the express purpose of keeping the public informed.
- Excellent achievement in changing the Comprehensive Plan to include fair housing and affordable housing, as well as safe and healthy environments as goals.
- The Fair Housing Assessment was attempted but not implemented, but the Department of Health and Wellness instituted a health equity assessment, which is useful for this goal.

- The Land Development Code has not been changed to meet the goals of the new Comprehensive Plan but there is a strategy that has been implemented to do so.
- **Action Steps to be completed in 4-7 years**
 1. Investigate incentives in the Land Development Code for housing that meets the needs of those with special needs or who have disabilities requiring housing adaptation.
 2. Investigate incentives to build near transit corridors and disincentives to build where no public transit exists.

Outcomes:

- The review of zoning for different types of housing has begun, but has not been implemented. This arises from the increased need for places to help in addiction recovery.
- The Transportation Plan for Louisville does include this goal and will be implemented in the Dixie Highway corridor.
- **Action Steps to be completed in 8-20 years**
 1. Continue to review the Land Development Code to create incentives and remove barriers that have the effect of limiting choice for households in protected classes in substantial contiguous areas of Louisville.

Outcomes:

- Implement the strategy to change the Land Development Code to meet the new goals of the Comprehensive Plan.

Building Code

- **Action Step to be completed in 3 years**
 1. *See: legislative action steps*
- **Action Steps to be completed in 4-7 years**
 1. Investigate incentives to renovate housing to meet “visitability” standards so that persons with disabilities can visit others.

Outcomes:

- This may be part of the review of the Land Development Code to meet the goals of the Comprehensive Plan.

Transportation

- **Action Steps to be completed in 3 years**
 1. Increase the federal transportation funds apportioned to public transit by 20 percent.
 2. Ensure proportional representation for those in protected classes at the Metropolitan Planning Organization, which is a federally mandated body that oversees how federal transportation dollars are spent and which is staffed by the Kentuckiana Regional Planning and Development Agency. Currently, the Metropolitan Planning Organization (locally known as the Transportation Planning Committee) apportions votes to give greater weight to areas that do not have concentrations of people in protected classes.
 3. Ensure protected class members are appointed to the Metropolitan Planning Organization.
 4. Host all meetings of the Metropolitan Planning Organization at a time, place, and day of the week so that those using public transit can attend and those with majority working hours can attend.

5. Broadcast meetings of the Metropolitan Planning Organization live on Metro TV and other transmittal media.
6. Encourage multi-modal transportation, including bicycle lanes, to work centers.

Outcomes:

- Aggressively sought funds to upgrade the buses.
 - The Dixie Highway Rapid Bust Transit Corridor is near completion and it includes many strategies to make public transit safe, desirable, and useful
 - No progress on making the representation on the Metropolitan Planning Organization representational of the minority communities in Louisville.
 - No progress on holding the meetings at a place and time that the public using transit can attend.
 - Meetings are on the KIPDA website, but not on Metro TV
 - Adopted updated Safe Streets ordinance to make pedestrian and bicycle use safer.
 - Created 65 miles of bicycle lanes.
- **Action Step to be completed in 4-7 years**
 1. Increase the federal transportation funds apportioned to public transit by 45 percent.

Outcome:

- This is problematic and may require increasing local tax for public transit.
- **Action Step to be completed in 8-20 years**
 1. Fund and have a public transit system that can take residents from any residential neighborhood to work and business sites, including park and ride or bike and ride.

Outcome:

- A goal of many groups, including health care policy makers, but still an issue.

Environmental factors

- **Action Step to be completed in 3 years**
 1. Continue to seek funding for lead-based paint remediation programs for areas with concentrations of households in protected classes with children.

Outcomes:

- Funded a project to hand out 2000 free lead dust testers to families with children. This advancement in creating a very cheap test for lead should be made a mandatory test for all rental housing and in sales.
 - Continues to aggressively seek funding for lead programs.
- **Action Steps to be completed in 4-7 years**
 1. Encourage frequent and regular testing, remediation, and education programs to improve air and soil quality in areas with concentrations of households in protected classes.

Outcomes:

- Air Pollution Control District has regular testing and community education.
- Soil quality is less monitored.

- **Action Steps to be completed in 8-20 years**

1. Work to remediate or contain all residential units for lead-based paint in areas with concentrations of households with children in protected classes.

Outcomes:

- The inexpensive testing and remediation of lead soil contaminants should be made mandatory.

Rehabilitation of older housing where concentrations of households in protected classes live

- **Action Step to be completed in 3 years**

1. Continue to seek funding for rehabilitation of residential structures for energy efficiency and to lower utility usage and cost to households in areas with concentrations of households in protected classes including rental housing, in accord with the market analysis and Fair Housing Assessment.

Outcomes:

- While the County Attorney has finally (and occasionally) represented Louisville Metro in LG&E utility rate cases, they did not do so in the Demand Side Management case. One program that almost was eliminated is the WeCare program, which does energy efficient rehab on over 500 homes of low-income people each year. The city needs to be represented as an Intervenor in all rate cases.

- **Action Steps to be completed in 4-7 years**

1. Continue community education on safe and best practices for rehabilitating older housing.

Outcome:

- Some education is available especially about lead.
- Passed an ordinance to have a person responsible and easy to reach by Codes and Regulations to respond to code violations.

- **Action Step to be completed in 8-20 years**

1. Develop a program and seek funding with the goal to rehabilitate all residential structures built before 1980 in areas with concentrations of households in protected classes in accord with the market analysis and Fair Housing Assessment.

Outcomes:

- Expand the WeCare Program.

Vacant properties in areas with concentrations of households in protected classes

- **Action Steps to be completed in 3 years**

1. Continue work to set definitions for various types of vacancy and use of Vacant and Abandoned Property Statistics as a measurement tool.
2. Identify and map potential infill sites and determine where infrastructure improvements may be needed.
3. Continue foreclosure and budget counseling and single point of access in Louisville Metro for referrals to these programs.

Outcomes:

- Significant work to get vacant and abandoned properties back into reuse.
- Merger of LandBank, Urban Renewal and Vacant Property commissions for ease of process

State Laws:

- 2011- statute change granted code enforcement liens including abatement costs new priority over all other liens (except taxes). This helped LMG create the foreclosure program. Since 2012, over 900 foreclosures on vacant properties have been initiated.
- 2014 – decreased right of redemption period from 12 to 6 months and allowed for collection of any property-related costs borne by buyer. This allows property owners to begin work on properties sooner.
- 2016 – amended spot condemnation statute to make it more financially feasible. Allows cost of rehab and/or demo to be subtracted from fair market value.
- 2016- created statute to allow Tax Delinquency Diversion Program. Cities may designate areas where delinquent tax liens will not be sold for 5 years. Renewable.
- 2016 – statute requires grantee to file deed within 5 days of receipt from Commissioner (note from Laura: no teeth here, so it hasn't been that helpful)
- 2017- statute allows Landbank to collect 50% of ad valorem property taxes of sales for 5 years after sale (school board is exempted)

Sales Programs:

- Launched several new sales programs designed to get vacant lots in the hands of residents and also to save structures from demolition. Cut it Keep it program allows owners of occupied properties to purchase a lot on their block for \$500 with limited restrictions. And, the Last Look program offers demolition candidates for \$1 if the buyer shows proof of funds for stabilization and exterior rehab within 6 months.

Since FY2012:

- 960 foreclosures have been initiated.
 - 630 foreclosures have been completed.
 - 816 demolitions have been completed.
 - 419 Landbank properties have sold.
- **Action Steps to be completed in 4-7 years**
 1. Devise a registry of vacant properties for agreed-upon definitions.
 2. Continue to involve neighborhoods in developing a strategy for use of vacant properties.
 3. Seek to create incentives for a home-repair program to preserve neighborhoods where the value of housing has decreased substantially.
 4. Formalize legal merger or coordination of powers between the Louisville Jefferson County Landbank Authority, Inc. and the Urban Renewal Commission & Community Development Agency of Louisville, and the Vacant Property Review Commission to streamline urban revitalization and redevelopment efforts in predominately low-income areas.

Outcome:

- Passed an ordinance to have a person responsible and easy to reach by Codes and Regulations to respond to code violations.

- **Action Step to be completed in 8-20 years**

1. Continue to work to revitalize neighborhoods.

Outcome:

- There has been significant work in bringing real estate investment into west Louisville, where conditions are harshest and large numbers of vacant properties. There needs to be more focus on the people living there to prevent involuntary displacement.
- One West which focuses on increasing business enterprise was created and has helped with several businesses
- Russell Place of Promise focuses on residents of Russell to increase their stability and earning potential.

Funding and Economic Development

- **Action Steps to be completed in 3 years**

1. Continue work to create a funding source for the Louisville Affordable Housing Trust Fund, a fund created by Louisville Metro Ordinance to address the housing needs of people with incomes below 80 percent of median income for Louisville.
2. Continue work on Bank On, a program that encourages and enables people who are unbanked to have access to banking products.
3. Continue Individual Development Account programs, a matched saving program for specific uses such as purchasing a home, starting a business, or getting an education.
4. Continue youth Individual Development Account programs, a matched savings program for specific use, such as to purchase a computer, establish good savings behavior, or learn about handling finances.
5. Support the existence of a local Community Development Finance Institution, a bank that is able to attract capital for public purposes by offering tax advantages that focuses on housing and micro businesses in targeted areas.
6. Use bonding powers to further fair housing by assessing bonding issues for impact on fair housing using the Fair Housing Assessment.
7. Work with the Kentucky Housing Corporation to ensure that urban areas receive competitive points in the Low-Income Housing Tax Credit program at the same level as rural areas.
8. Work with the Federal Home Loan Bank to ensure that urban areas receive competitive points in the grants program at the same level as rural areas.

Outcomes:

- Two public housing family projects were razed and have been completed or are in completion.
- Funding in the millions for the Louisville Affordable Housing Trust Fund over several years. Using bonding capacity.
- Created Louisville CARES to give loans to create rental housing for workers using bonding capacity.
- A new Community Development Financial Institution, LHOME, is certified and focuses on housing and micro-business lending.

- Bank On continues its work.
 - Great expansion of the free tax preparation sites.
 - Individual Development Account funding from the federal government was severely diminished.
 - Continual expansion of the Section 8 for ownership program.
- **Action Steps to be completed in 4-7 years**
 1. Investigate how to protect long-term owners from gentrification with policies that create a property tax break for those who upgrade their property, so these owners have incentives to improve their properties.
 2. Devise a neighborhood and public/private sector plan for micro-enterprise lending.
 3. Assess the advantages of a loan loss pool as a possible tool to encourage private partnerships in economic development.

Outcomes:

- Instituted a moratorium on selling delinquent real estate tax liabilities to third parties covering several fragile neighborhoods- after working to pass state legislation to give this choice to communities. See the Vacant Property goals.
 - Composing other programs that have not yet been instituted.
 - Occasional bank loan programs for rehabilitation of owner-occupied homes in targeted neighborhoods with some loan forgiveness opportunities.
 - Louisville Metro Housing Authority will use Vouchers for Homeownership to help existing homeowners in the Russell neighborhood.
- **Action Step to be completed in 8-20 years**
 1. Investigate other tools to create a financing pool for housing and economic development.

Outcomes

- Actively assessing ideas and other best practices to see what can be done in Louisville.

Legislative action: All ongoing over twenty years

1. Support the repeal K.R.S. 381.300, the Kentucky law that allows the state to seize a home purchased by non-resident alien if the person does not become a citizen in eight years.
2. Work to change the federal policies of the Low-Income Housing Tax Credit to eliminate bonus incentives to develop in Qualified Census Tracts (census tract in which 50% or more of the households are income eligible) as this adds more low-income housing to areas that are already low-income.
3. Work to change K.R.S 198 (B) which limits incorporating into local building codes the federal requirements on building to meet needs of disabled persons.
4. Investigate best practices of other states in requiring that deeds be filed within a specified time period.
5. Advocate for voter-driven, local funding options/opportunities, including those already authorized and future possibilities, such as LIFT, that can aid in community development and neighborhood revitalization through infrastructure investment and catalytic capital projects.

Outcome:

- While none of these actions were accomplished, there is, embedded in the outcomes of other parts of the outcomes of the Action Plan from 2015, many instances of both state and local ordinances to improve conditions. For instance under the Vacant Property goals

2020 to 2025 Recommended Action Plan

New challenges are facing Louisville, even with the many of the old impediments to fair housing choice still in strong force. The 2015 plan of action was aspirational and should be a reminder of specific work that needs to be addressed. But the plan going forward should reflect how uncertain our future is.

(1) The Land Development Code needs improvement to remove any impediment to fair housing choice

- **Amend the Land Development Code to create inclusionary zoning:** Using incentives is helpful, but has not produced the necessary numbers of units to ensure that future residents are housed and that our children grow up in safety and stability.
 - a. This Code needs to be changed to guarantee that residential development will have to include housing that is affordable for those at 30% of median income and 50% of median income.
 - b. Allow for innovative solutions to provide affordable housing.

(2) Intentionally create housing for identified populations

- **Create more affordable housing units to persons below 50% Area Median Income:** Creating units in addition to changing the Land Development Code is necessary.
 - a. Prioritize creation of housing affordable to those under 50% and 30% of median income.
 - b. Preserve unsubsidized affordable housing through acquisition and rehabilitation of units at risk of rising rents.
 - c. Expand the use of Low Income Housing Tax Credits and explore a state LIHTC.
- **Create specifically supportive housing for populations that need special assistance.** Those recovering from addiction are a growing population. There will only be more people who are aging and, with the rate of those over 65 who have a disability three times that of those under 65, more visitable and disability-friendly living designs are needed.
- **Use techniques that have monetary value as incentives** such as design flexibility to get greater density, expedited reviews, waivers of zoning requirements.

(3) Address the disparity in access to capital for those in protected fair housing classes

- **Expand capital to protected classes:**
 - a. Work with banks to expand protected classes.
 - b. Explore the city generating its own lending criteria through the Community Development Financial Institutions that have been created in and for Louisville and the CDFIs that will bring resources to Louisville.
 - c. Continue funding the Louisville Affordable Housing Trust Fund and look to potential dedicated recurring sources.

- d. Use the Louisville Metro Housing Authority's programs for homeownership to help neighborhoods.
 - e. Use Metro funds to fill gaps in funding for creation of both affordable rental units and to make ownership affordable.
 - f. Continue creative use of vacant and abandoned property to bring it into reuse and use restrictive covenants to ensure continued intended use.
 - g. Expand local fair housing defined classes to make it a violation to discriminate by source of legal income.
 - h. Allow financing of renter equity programs.
 - i. Use of Community Land Trusts (CLT), whether through transfer of city-owned property to a CLT or by encouraging funding of CLTs.
 - j. Create and/or expand programs that assist in either down payments or monthly assistance in payment of mortgages, such as employer assisted homebuyer programs or Vouchers for homeownership.
 - k. Create partnerships for subsidized home improvements for lower income purchasers whether before purchase or to help those in neighborhoods in danger of deterioration, including matched savings plans for home repairs. Partner this with code amnesty for agreed upon times for low-income owners where there are no dangerous conditions.
 - l. Continue the Tax Delinquency Deferral Program and freeze real estate property taxes for long-term homeowners at risk of losing their homes due to swiftly rising real estate values.
 - m. Include a market review to see if programs listed above or created expand geographic areas.
 - n. Utilize the Health Impact Assessment and Fair Housing Assessments for new neighborhood developments.
- **Strong effort to get every household to fill out the Census**
 - a. Efforts by local government have been in place.
 - b. New efforts that work while households are quarantined for the COVID-19 are being developed.
 - **Address redlining and improve access to capital in local lending communities:** The policies that in the 1940's to 1980's excluded black households from ownership programs supported by the federal government.
 - a. There must be an acknowledgement of this legacy and an active campaign to counter it.
 - b. Include real estate and realtor practices as part of the review.
 - c. Review insurance company practices.
 - d. Expand fair housing protected classes to include prior arrest and conviction records, being a veteran and/or being homeless. The exceptions under arrest and conviction protections are under discussion.
 - **Increase incomes of people in protected classes.** This is particularly true in areas of deep concentrations of segregation where residents are facing potential involuntary displacement.
 - a. Focus on programs that help train people in existing jobs.
 - b. Use the CDFIs to help start micro-businesses.
 - c. Explore the use of matched savings programs.
 - d. Keep expanding the Volunteer Income Tax preparation sites.
 - e. Expand the All Seasons Assurance Plan to help keep utility costs below 10% of income.
 - f. Analyze costs for low-income people to see what can be avoided so that households keep the income they have, e.g. fees for money orders, access to fresh but affordable produce.

(4) Address practices of Real Estate related industries

- **Analyze and test the practice of realtors** to see what role they play in segregation both in rental and by ownership.
- **Review the outcomes of changes to appraisal laws** instituted a decade ago and effect on segregated areas.
- **Regularly be a party to utility cases**, including rate cases to assess for impact on low-income households and whether proposed changes encourage or discourage new energy production techniques, such as solar.
- **Research the insurance industry**, which seems to be engaged in significant redlining both for car and private mortgage homeowner insurance. Reports that delve into insurance rates have found the differences in rates to be unrelated to payouts.
 - a. Increase transparency in rate setting for car, homeowner and PMI insurance.
 - b. Advocate for actuarial acknowledgement of the efficacy of pre purchase counseling programs.

(5) Address Rental Conditions

- **Pass ordinances that are assertive in identifying health and housing code violations** and set time frames for repairs regardless of whether the renter has left.
- **Monitor the loss of permanent rental** to the short-term rental market to see the effect on affordability and availability of long-term rental units.

(6) Public Education

- **Create a new campaign to increase awareness of what fair housing is.** From the results of the survey, a group of people who self-selected because of an interest in fair housing, it is clear that a better, campaign on what fair housing is and the rights people have under the laws, and where to go for assistance is necessary, especially in the area of housing those with a disability.
- **Create a campaign to counter old attitudes.** The policies that in the 1940's to 1980's excluded black households from ownership programs supported by the federal government have inculcated the feeling that black households are toxic to a neighborhood if approaching the over 20% of residence that their population share should support.
 - a. There must be an acknowledgement of this legacy and an active campaign to counter it. This includes more.
 - b. Study what goes into choices of purchase of black homebuyers to ensure freedom of choice.

2020 Fair Housing Survey Results

A fair housing survey was released to the public utilizing the online service Survey Monkey. The 15 questions in the survey were intended to assess people’s knowledge of fair housing issues and opinions of fair housing in metro Louisville. The survey was promoted through the Metropolitan Housing Coalition (MHC) eNewsletter, social media (Facebook and Twitter), and partner organization media. The survey was open to the public for eight weeks and received a total of 132 responses, receiving 90 more responses than the 2015 Fair Housing Survey.

Part 1

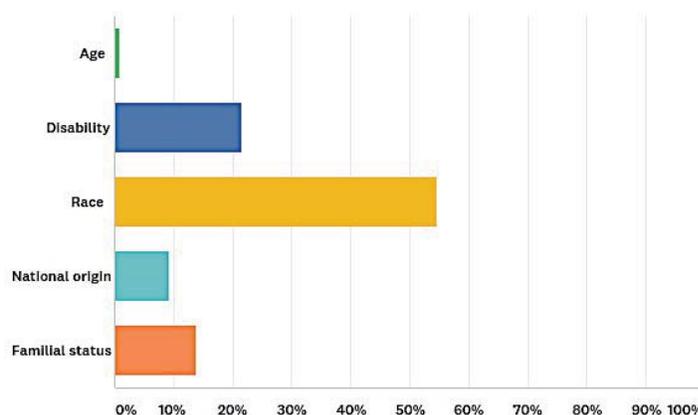
While the survey sample represents a larger response than 2015, our generalizations must still be limited. The average score of all respondents to their knowledge of fair housing issues was 51%, which comprise the first nine questions of the 2020 survey. A total of 71 respondents (54%) correctly identified all protected classes covered by fair housing laws, which include federal, state, and local laws. Louisville laws include protections for individuals based on sexual orientation and gender identity, which are not covered in federal or state law.

We asked respondents in question two to identify who people in Louisville should contact first if they feel they have been discriminated against in a housing situation. Forty-four percent of respondents correctly identified the Louisville Metro Human Relations Commission as the appropriate first point of contact for housing discrimination claims in metro Louisville.

Eighty percent of respondents correctly indicated that landlords do not have the right to deny housing to a family or person with a child in a typical rental situation, while Forty-two percent of respondents correctly identified those protected under the familial status class.

Disability formed the basis for the majority of reported housing discrimination claims in Louisville. Only twenty-two percent of respondents correctly answered that a disability was the basis for the majority of reports of housing discrimination in Louisville, while a majority of 55% incorrectly chose race as the basis for most claims. The rise in disability claims is in large part due to this category includes service animals.

Q5 The most reported housing discrimination in Louisville is based on

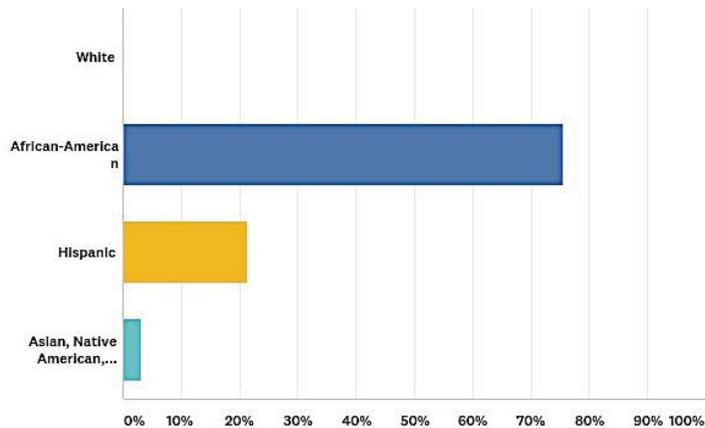


Seventy-four percent of respondents correctly indicated that a realtor’s job is to guide clients to homes in their price point, regardless of the area.

Only 35% of respondents identified \$872 as the current fair market rent (FMR) for a two-bedroom apartment in Louisville, while 46% responded that FMR would be \$771 for the unit and 18% responded that \$682 would be FMR for the unit.

Seventy-six percent of respondents correctly identified that African Americans were the ethnicity with the lowest homeownership rate at the end of 2019, while 21% of respondents answered Hispanic had the lowest homeownership rate.

Q8 As of the end of 2019, which of the ethnicities listed below has the lowest rate of homeownership in the nation?



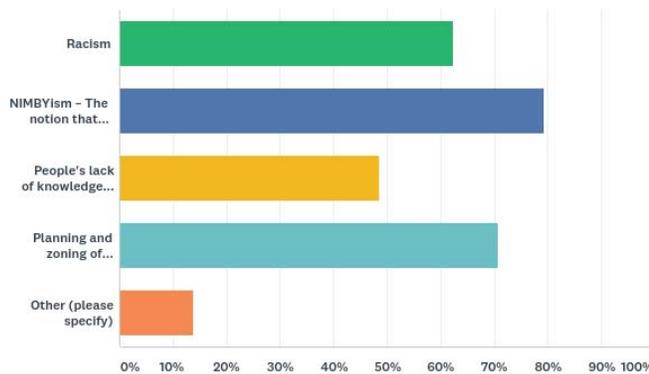
Respondents were asked to identify how many years ago the national and Kentucky Fair Housing Acts were passed. Thirty-six percent responded correctly with 52 years (1968), while 33% incorrectly chose 38 years (1982) and 21% chose 19 years (2001).

Part 2

The final questions allowed respondents to share their opinions of fair housing issues in Louisville. Ninety-five percent of respondents indicated they do not believe the average resident of Louisville knows and/or understands the term “fair housing”.

When asked about the greatest impediments or barriers to fair housing choice for all Louisvillians, 80% of respondents said NIMBYism, 70% said planning and zoning of public and affordable housing developments, 63% said racism, and 48% cited people’s lack of knowledge of their housing rights.

Q11 What do you see as the largest impediments or barriers to fair housing choice for all Louisvillians? You may choose more than one.



Fourteen percent of respondents indicated OTHER and provided specific responses:

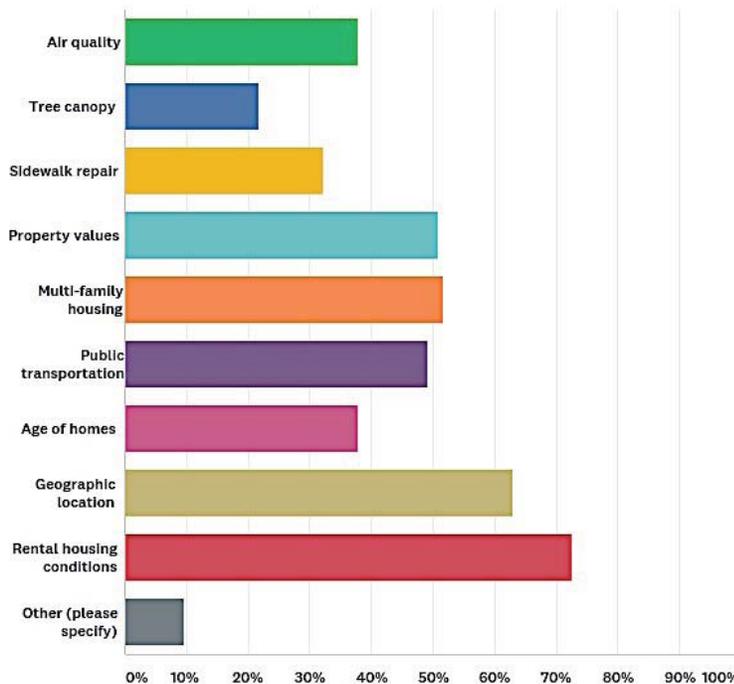
- No affordable housing available/ restrictions are too high
- Building nice apts that are section 8 so a middle class person is not allowed to live there
- Lack of funding for affordable housing and lack of investment in affordable housing
- Affordability
- Biggest impediment is income level. It is for me.
- Policies that prioritize land investment over productive land use
- Source of income discrimination (“no section eight”)
- Lack of alternative options
- GSE appraisal requirements which make affordable mortgages unavailable in distressed areas
- Lack of capital for equitable housing ownership & land distribution
- Language barriers--it can be very difficult for immigrants to find a landlord who will treat them fairly
- Ability to afford to live where one wishes to
- Source of income discrimination
- Lack of affordable options in neighborhoods where people work; lack of affordable units on the first level for wheelchair accessible safety
- Lack of affordable housing, lack of living wage
- Household income and availability of affordable housing
- Language barriers
- Historical legacy of red-lining

We asked respondents whether fair housing discrimination in Louisville is improving, worsening, or staying the same. Fifteen percent responded that discrimination is improving, 35% said it is worsening, and 50% said housing discrimination remains the same.

Seventy-three percent of respondents indicated they had never personally been a victim of housing discrimination, 12% said they had been a victim, and 15% said they were not sure.

We asked respondents to consider whether certain conditions are part of deciding if the condition is a fair housing element. The top five responses were Rental Housing Conditions (73%), Geographic Location (63%), Multi-family Housing (52%), Property Values (51%), and Public Transportation (49%).

Q14 Which of these conditions are part of deciding if it is a fair housing element?



Several respondents responded OTHER with specific responses:

- City needs to do better
- Affordability
- All of the above
- Street conditions (potholes, trash, etc); right of way maintenance (grass, tree lines); illegal vehicle dumping
- Green space nearby; contamination / brownfields / industry nearby; disability accommodations
- No idea
- Not sure I understand this question (4)

Survey participants were also asked to add any additional thoughts they would like considered as we compile data and write the “2020 Analysis of Impediments (AI) to Fair Housing Choice in Louisville, Jefferson County.” The following responses were received:

- Need more second chance avail for people w/ evictions
- Wow that is along title. Please present this report in a way that is easily digestible - less long narratives and more infographics, etc. Boil it down to what is the most important information to know
- There is a huge lack of affordable housing initiatives in Louisville. I see so many luxury types of

developments in the downtown and fringe areas

- Source of income discrimination remains a permissible pretext to racial discrimination and single parents
- Louisville has virtually NO affordable housing that is ACCESSIBLE for people who use a wheelchair!!
- There isn't enough affordable housing, so landlords find it easy to discriminate against vulnerable populations
- To what extent have LMG, LMHA and the LAHTF made it more difficult for Louisvillians to access fair and affordable housing
- I would love more education for me and my community; I see desperate need for more units for people in poverty and with disabilities
- Gentrification, Eviction, Mortgage lending, Affordable housing, Proximity of basic services to minority residences, etc.

Interviews Conducted for this Document

Interviewees

Edgardo Mansilla, Director, Americana Community Center

Juva Barber, Director, Building Industry Association of Greater Louisville

Jeff O'Brien, Director, Develop Louisville, Louisville Metro government

Yalonda Buckner, President, Louisville Chapter of the Black Realtists Association

J.D Carey, Director, Louisville Apartment Owners Association

by e-mail Laura Grabowski, Director, Office of Community Development, Louisville Metro government

by e-mail Yu "Emily" Liu, Director, Planning and Design Services, Louisville Metro government

Lisa Beran, Director, Kentucky Housing Corporation .

No response from Greater Louisville Association of Realtors, but there was an interview with the Black Realtists, or Louisville Metro Housing Authority (LMHA), but LMHA has the Moving to Work Plan which is included as a resource.

Reporting Agencies

Fair Housing Council of Lexington

Louisville Metro Human Relations Commission

Kentucky Commission on Human Rights

U.S. Department of Housing and Urban Development

Data Resources:

Natalie Harris, Louisville Coalition for the Homeless

Kevin Dunlap, REBOUND

Legal Updates

This section provides an overview of the fair housing situation in Louisville METRO/Jefferson County, Kentucky. It includes a review of fair housing laws, enforcement agencies, trends in fair housing complaints and other fair housing activities in the jurisdiction.

Fair housing in Louisville METRO/Jefferson County, Kentucky is bound by a number of federal and local laws and Presidential executive orders. Below is a summary of the relevant legislation and executive orders currently in effect.

Federal Fair Housing Laws¹

- Title VIII of the Civil Rights Act of 1968 (Fair Housing Act), as amended. Prohibits discrimination in the sale, rental and financing of dwellings, and in other housing-related transactions, based on race, color, national origin, religion, sex, familial status, and handicap (physical or mental impairment which substantially limits one or more of such person's major life activities). Amendments also established that new multi-family buildings must meet specified accessibility standards for person with disabilities.
- Title VI of the Civil Rights Act of 1964. Prohibits discrimination on the basis of race, color or national origin in programs and activities receiving federal financial assistance.
- Section 504 of the Rehabilitation Act of 1973. Prohibits discrimination based on disability in any program or activity receiving federal financial assistance.
- Section 109 of Title I of the Housing and Community Development Act of 1974. Prohibits discrimination on the basis of race, color, national origin, sex or religion in programs and activities receiving financial assistance from HUD's Community Development and Black Grant Program.
- Title II of the American with Disabilities Act of 1990. Prohibits discrimination based on disability in programs, services and activities provided or made available by public entities. HUD enforces Title II when it relates to state and local public housing, housing assistance, and housing referrals.
- Architectural Barriers Act of 1968. Requires that buildings and facilities designed, constructed, altered, or leased with certain federal funds after September 1969 must be accessible to and useable by handicapped persons.
- Age Discrimination Act of 1975. Prohibits discrimination on the basis of age in programs or activities receiving federal financial assistance.
- Title XI of the Education Amendments Act of 1972. Prohibits discrimination on the basis of sex in education programs or activities that receive federal financial assistance.

Fair Housing-Related Presidential Executive Orders²

- Executive Order 11063. Prohibits discrimination in the sale, leasing, rental or other disposition of properties and facilities owned or operated by the federal government or provided with federal funds.
- Executive Order 11246, as amended. Bars discrimination in federal employment because of race, color, religion, sex or national origin.

¹ HUD, OFHEO (Office of Fair Housing and Equal Opportunity) 2004b

² Ibid.

- Executive Order 12892, as amended. Requires federal agencies to affirmatively further fair housing in their programs and activities, and provides that the Secretary of HUD will be responsible for coordinating the effort. The order also establishes the President’s Fair Housing Council, which is chaired by the Secretary of HUD.
- Executive Order 12898. Requires that each federal agency conduct its program, policies, and activities that substantially affect human health or the environment in a manner that does not exclude persons based on race, color or national origin.
- Executive Order 13166. Eliminates, to the extent possible, limited English proficiency as a barrier to full and meaningful participation by beneficiaries in all federally subsidized and federally conducted programs and activities.
- Executive Order 13217. Requires federal agencies to evaluate their policies and programs to determine if any can be revised or modified to improve the availability of community-based living arrangements for persons with disabilities.
- www.federalregister.gov/documents/2012/02/03/2012-2343/equal-access-to-housing-in-hud-programs-regardless-of-sexual-orientation-or-gender-identity

CITY OF LOUISVILLE ORDINANCES

- Ordinance No. 21, Series 1967: As amended, an Ordinance to implement the State Statute relative to discriminatory practices in places of public accommodation, resort or amusement.
- Ordinance No. 116, Series 1968: As amended by ordinance No. 139, series 1975, an ordinance to effect equal employment opportunities for all citizens.
- Ordinance No.9, Series 1999: An ordinance that prohibits discriminatory employment practices due to sexual orientation or gender identity.
- Ordinance No. 88, Series 2001: An ordinance that amended Ordinance No. 9 to include housing and public accommodations.
- Ordinance No. 349, Series 1991: An ordinance that makes housing laws substantially equivalent to Title VII of the Federal Civil Rights Act.
- Ordinance No. 281, Series 1991: An ordinance empowering the Louisville and Jefferson County Metro Human Relations Commission to investigate complaints by persona alleging tortuous interference with their person and/or property motivated by discriminations.
- Ordinance No.41, Series 1969: As amended by ordinance No. 140, Series 1975, an ordinance requiring the implantation of certain provisions insuring equal opportunity into all contracts.
- Ordinance No. 68, Series 1978: As amended by ordinance 211, Series 1993, an ordinance concerning the requirements of an affirmative action plan for contactors and vendors doing business with the City of Louisville.
- Ordinance No. 140, Series 1988: An ordinance empowering minority, female and handicap business enterprises.

JEFFERSON COUNTY ORDINANCE AND RESOLUTIONS: A resolution to implement the State statute relative to equal employment opportunity as Amended by Resolution No. 15, Series 1967.

- Ordinance No. 2, Series 1993: An ordinance relating to real estate transactions.
- Ordinance No. 8, Series 1988: An ordinance implementing the State statute relative to discriminatory practices in places of public accommodation, resort or amusement.
- Ordinance No. 16, Series 1987: An ordinance concerning the requirement of an affirmative action plan for contractors and vendors doing business with the Jefferson County Fiscal Court.
- Ordinance No. 36, Series 199: An ordinance that prohibits discriminatory practices in housing, employment and places of public accommodation due to sexual orientation or gender identity.

LOUISVILLE AND JEFFERSON COUNTY METRO ORDINANCES

- Ordinance No.129-2003: An ordinance creating separate enforcement and advocacy bodies; transferring enforcement authorities to the Louisville Metro Human Relations Commission-Enforcement; and amending the complaint procedure for enforcing anti-discrimination laws.
- Ordinance No. 214, Series 2005: An ordinance requiring that all persons or companies doing business with Louisville METRO Government, in excess of ten thousand dollars (\$10,000) be equal employment opportunity employers.
- Ordinance No.193-2004: An ordinance prohibiting discrimination based upon race, color, national origin, religion, familial status, age, disability, sex gender identity, and sexual orientation.

The most important piece of legislation pertaining to fair housing is the federal Fair Housing Act (FHA). The FHA was initially enacted as Title VIII of the Civil Rights Act of 1968.³ It was later amended by the Fair Housing Amendment Act (FHAA) of 1988 and currently prohibits housing discrimination based on race, color, national origin, religion, sex, familial status, and handicap. Familial status includes children under the age of 18 living with parents of legal custodians, pregnant women, and people securing custody of children under the age of 18. Handicap is a physical or mental impairment that substantially limits one or more a person’s major life activities. Under the FHA, housing discrimination incorporates rentals, sales; mortgage lending, appraisals, homeowners insurance, zoning, tax assessment, blockbusting and advertising.⁴ Specifically, the FHA prohibits taking any of the following actions based on race, color, national origin, religion, sex, familial status or handicap:

- refusing to rent or to sell after an offer, refusing to negotiate to rent or to sell, or otherwise making unavailable or denying housing;
- discriminating in the terms, conditions, or privileges of the sale or rental of housing;
- representing that a dwelling is not available for inspection, sale, or rental when it is, in fact, available;
- inducing or attempting to induce for profit the sale or rental of any dwelling by the entry of or prospective entry of a person into the neighborhood (also referred to as blockbusting);
- denying anyone access to or membership in a facility or service (such as a multiple listing service) related to the sale or rental of housing;
- refusing to make a mortgage loan or to provide information on a mortgage loan;
- imposing different terms or conditions on a mortgage loan (such as interest rates, points, or fees);
- discriminating in appraising a property; and

³ 42 U.S.C §§ 3601-3619.

⁴ 42 U.S.C §§ 3604-3619.

- refusing to purchase a mortgage loan or setting different terms for purchasing a loan

In addition, the FHA prohibits:

- making, printing, publishing, or causing to be made any advertisement or notice for the sale or rental of housing that indicated a preference or limitation based on race, color, national origin, religion, sex, familial status, or handicap (the prohibition against discriminatory advertising applies to single-family and owner-occupied housing that is otherwise exempt from the Fair Housing Act);
- coercing, intimidating, interfering, or threatening of an individual's ability to exercise their rights under the FHA; and
- retaliating against an individual because they exercised their FAH rights

The FHA includes exemptions for owner-occupied buildings with no more than four units; the sale or rental of single-family homes without the use of a real estate agent if the owner has no more than three properties; the sale, rental or occupancy of housing operated by a religious organization or private club to its members; or the limiting of familial status in the housing for the elderly.⁵

Additional provisions of the FHA require allowing handicapped persons to make “reasonable modifications” to housing that they occupy or will be occupying so that they can afford full enjoyment of the premises. The landlord, can, however, require a handicapped person to pay for any modifications and, in the case of rental housing, require the tenant to restore the apartment back to its original condition prior to modification. Landlords must also make “reasonable accommodations” in rules, policies, practices, or services if necessary for a disabled person to use the housing.⁶

Finally, the FHA requires multifamily buildings that are ready for first occupancy after March 13, 1991, have an elevator, and have four or more units to meet minimum standards of accessibility for persons with disabilities:

- All public and common-use areas must be readily accessible to and usable by handicapped persons.
- All doors designed to allow passage into and within all apartments must be sufficiently wide to permit access by handicapped persons in wheelchairs.
- All apartments must contain an accessible route into and through the living space; light switches, electrical outlets, thermostats, and other environmental controls in accessible locations; reinforcements in bathroom walls to allow later installation of grab bars; and usable kitchens and bathrooms such that an individual in a wheelchair can maneuver about the space.

If a building with four or more units has no elevator and will be ready for occupancy after March 13, 1991, these standards apply to ground floor units only.

While the FHA has federal jurisdiction, local, county and state laws, such as these ordinances that exist in Louisville METRO/Jefferson County, can include similar or additional protections for their residents against housing discrimination. State, county and local laws cannot revoke any protection guaranteed by the FHA, but they can

⁵ 42 U.S.C. §§ 3604-3619.

⁶ 42 U.S.C. §§ 3604.

expand protections to include classes of persons not covered under federal laws. For example, 14 states plus the District of Columbia have passed laws that provide protection for gays, lesbians, bisexuals, and transgender people, who are not federally protected by the Fair Housing Act.⁷

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⁷ Leadership Conference on Civil Rights education Fund 2005.

Move Louisville

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Appreciations

Thanks to all those who helped inform this paper by participating in interviews, completing surveys and sharing your thoughts about impediments to fair housing choice.

We offer special thanks to the Metropolitan Housing Coalition (MHC) Board of Directors who supported the MHC staff in this endeavor. Staff: Cathy Hinko, Executive Director, and Anthony P. Curtis, Development Director.

Addendum

Trends in Fair Housing Complaints and Enforcement

While HUD has primary responsibility for enforcing the Fair Housing Act (FHA), a fair housing complaint or claim can be filed not only with HUD but also with a local “substantially equivalent” agency or the judicial system. A “substantially equivalent” agency is one that HUD has certified as enforcing a law that “provides substantive rights, procedures, remedies and judicial review provisions that are substantially equivalent to the federal Fair Housing Act”. Discriminatory acts covered by state and local housing laws, but not by the FHA, are filed with a state or local fair housing agency or human rights agency. There is a one-year statute of limitations to file a complaint with HUD or a substantially equivalent agency and two-year statute if filing within the judicial system.

After receiving a complaint, HUD or the local substantially equivalent agency has 100 days from the complaint filing date to either investigate or send written notification to both parties as to why an investigation was not completed. If the investigation finds discrimination or “reasonable cause” to believe the law was violated, a charge is issued against the person or entity committing the alleged discriminatory act, which will result in further legal action. The FHA requires that HUD or the substantially equivalent agency first attempt to reconcile each complaint before issuing a charge. If a resolution cannot be reached, the complainant may choose to have the charge decided in federal district court with the Department of Justice or before a HUD administrative law judge.

In Louisville Metro there are additional categories of protected classes beyond the FHA and the state fair housing law. In addition to race, religion, color, gender, familial status, national origin and disability, protected classes include sexual orientation and gender identity. There is also a local trigger for when the local fair housing law applies to all protected classes in a rental situation. Instead of four units, there only has to be two units and one can be the owner’s unit. So, virtually all rental situations are covered by either the local law alone or the local, state, and federal fair housing laws. When a complaint arises from a situation, either through the protected class or the lower trigger point, which is only covered by the local fair housing law, the local County Attorney’s office is the prosecutor.

Further local variation is the Louisville Metro Human Relations Commission (Louisville HRC) is the Fair Housing Assistance Program (FHAP) designated by HUD for Louisville Metro. The statewide Kentucky Commission on Human Rights (Kentucky CHR) defers to the Louisville HRC to take complaints unless the six-month limitation on filing a complaint has expired. The Kentucky CHR has a longer filing limitation, one year. So the Kentucky CHR takes cases where the reporting of the complaint occurs more than six months and less than one year after the incident. But Kentucky CHR can only take complaints that meet its criteria, not including the added categories and lower unit thresholds.

The Lexington Fair Housing Council (FHC), which is a Fair Housing Initiatives Program (FHIP) designated by HUD, takes complaints and conducts investigations in a jurisdiction that includes Louisville Metro. The FHC will also be an advocate for the complainant as the case proceeds, although the FHC does not prosecute cases.

U.S. Department of Housing and Urban Development (HUD), Fair Housing Division

As stated above, after receiving a complaint, HUD or the local substantially equivalent agency has 100 days from the complaint filing date to either investigate or send written notification to both parties as to why an investigation was not completed. HUD uses the appropriate investigative and enforcement agencies, but does keep some cases for investigation by HUD.

These are cases that involve allegations against federally funded organizations, such as the Louisville Metro Housing Authority. These cases were handled directly by HUD.

Our case investigation process has not changed. However, beginning in February 2016, Fair Housing and Equal Opportunity (FHEO) made a significant change in the intake process for these complaints. When FHEO receives Internet complaints or mailed complaints of housing discrimination, if the alleged violation occurs in Louisville, KY, we refer the correspondence directly to the FHAP agency, Louisville-Jefferson County Metro Human Relations, for the intake and potential investigation. There are certain exceptions under which we do not refer the potential complaint to the FHAP agency:

- Zoning cases
- Respondent's properties are outside the FHAP's geographic jurisdiction
- Lending (FFIEC member agency)
- If the case is systemic, e.g. Maternity leave case involving lending; Disability-income related lending; LEP allegations at federally subsidized property; Modification allegations at federally subsidized property; and cases is otherwise designated as systemic by HUD.
- If the Respondent receives USDA funds.
- The case would result in a conflict of interest for the agency.
- Possible Section 901 allegation to be referred to DOJ.
- The FHAP agency's statute of limitations has expired.
- The one-year statute of limitations for the case is about to expire.
- If the case is designated as novel/complex.

HUD/FHAP Housing Cases

Case Number - HUD	HUD/FHAP	Violation City	Violation State and County	Filing Date	Closure Date	Bases	Issues	Case Disposition	All Compensation and Victims Fund Amount
04-15-0244-8	FHAP	Louisville	Kentucky - Jefferson	01/13/15	05/12/16	Disability	Discriminatory terms, conditions, privileges, or services and facilities	Complaint withdrawn by complainant without resolution	\$0
04-15-0272-8	FHAP	Louisville	Kentucky - Jefferson	01/27/15	04/13/15	Disability	Non-compliance with design and construction requirements (handicap)	Conciliation/settlement successful	\$0
04-15-0273-8	FHAP	Louisville	Kentucky - Jefferson	01/27/15	10/05/15	Disability	Non-compliance with design and construction requirements (handicap)	Conciliation/settlement successful	\$0
04-15-0279-8	FHAP	Louisville	Kentucky - Jefferson	01/29/15	04/30/15	Disability	Discriminatory refusal to rent; Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	\$0
04-15-0350-8	FHAP	Louisville	Kentucky - Jefferson	02/19/15	05/19/15	Disability	Failure to make reasonable accommodation	No cause determination	\$0
04-15-0374-8	FHAP	Louisville	Kentucky - Jefferson	02/25/15	05/11/15	Sex	Discriminatory refusal to rent	No cause determination	\$0
04-15-0404-8	FHAP	Louisville	Kentucky - Jefferson	03/12/15	06/15/15	Race	Discriminatory refusal to rent	No cause determination	\$0
04-15-0406-8	FHAP	Louisville	Kentucky - Jefferson	03/12/15	07/21/15	Familial Status	Discriminatory advertising, statements and notices	Conciliation/settlement successful	\$0
04-15-0458-8	FHAP	Louisville	Kentucky - Jefferson	03/26/15	04/07/16	Race, Disability	Discriminatory financing (includes real estate transactions); Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	\$0
04-15-0566-8	FHAP	Louisville	Kentucky - Jefferson	04/28/15	06/05/15	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	\$0

04-15-0567-8	FHAP	Louisville	Kentucky - Jefferson	04/28/15	08/24/15	National Origin	Discrimination in terms/conditions/privileges relating to rental	Unable to locate respondent	\$0
04-15-0577-8	FHAP	Louisville	Kentucky - Jefferson	05/04/15	06/30/15	National Origin, Religion	Discriminatory refusal to rent; Otherwise deny or make housing unavailable	No cause determination	\$0
04-15-0578-8	FHAP	Louisville	Kentucky - Jefferson	05/04/15	03/28/16	Disability, Familial Status	Other discriminatory acts	No cause determination	\$0
04-15-0579-8	FHAP	Louisville	Kentucky - Jefferson	05/04/15	04/29/16	Sex	Other discriminatory acts	No cause determination	\$0
04-15-0580-8	FHAP	Louisville	Kentucky - Jefferson	05/04/15	09/08/15	Disability	Discrimination in terms/conditions/privileges relating to rental	No cause determination	\$0
04-15-0669-8	FHAP	Louisville	Kentucky - Jefferson	05/26/15	06/30/15	Familial Status	Discriminatory advertisement - rental	Conciliation/settlement successful	\$0
04-15-0670-8	FHAP	Louisville	Kentucky - Jefferson	05/26/15	03/30/16	Sex	Discriminatory advertising, statements and notices	Unable to locate respondent	\$0
04-15-0671-8	FHAP	Louisville	Kentucky - Jefferson	05/26/15	04/11/17	Familial Status	Discriminatory advertising, statements and notices	Conciliation/settlement successful	\$0
04-15-0672-8	FHAP	Louisville	Kentucky - Jefferson	05/26/15	06/30/15	Familial Status	Discriminatory refusal to rent; Discriminatory advertisement - rental	No cause determination	\$0
04-15-0704-8	FHAP	Louisville	Kentucky - Jefferson	06/03/15	01/13/17	Disability	Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	\$0
04-15-0705-8	FHAP	Louisville	Kentucky - Jefferson	06/03/15	09/08/15	Race, Disability	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable	No cause determination	\$0
04-15-0711-8	FHAP	Louisville	Kentucky - Jefferson	06/03/15	01/05/16	Disability	Discriminatory refusal to rent and negotiate for rental	No cause determination	\$0
04-15-0713-8	FHAP	Louisville	Kentucky - Jefferson	06/04/15	09/08/15	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental	No cause determination	\$0

04-15-0714-8	FHAP	Louisville	Kentucky - Jefferson	06/04/15	09/20/16	Familial Status	Discriminatory advertisement - rental	Conciliation/settlement successful	\$0
04-15-0759-8	FHAP	Louisville	Kentucky - Jefferson	06/17/15	09/09/15	Familial Status	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in services and facilities relating to rental	No cause determination	\$0
04-15-0760-8	FHAP	Louisville	Kentucky - Jefferson	06/17/15	07/21/15	Familial Status	Discriminatory refusal to rent; Discriminatory advertisement - rental	Conciliation/settlement successful	\$0
04-15-0763-8	FHAP	Louisville	Kentucky - Jefferson	06/19/15	04/20/16	Race	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	\$0
04-15-0777-8	FHAP	Louisville	Kentucky - Jefferson	06/23/15	09/08/15	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	\$0
04-15-0778-8	FHAP	Louisville	Kentucky - Jefferson	06/23/15	07/21/15	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	\$0
04-15-0866-8	FHAP	Louisville	Kentucky - Jefferson	07/27/15	03/28/16	Race	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental; Discrimination in services and facilities relating to rental	No cause determination	\$0
04-15-0868-8	FHAP	Louisville	Kentucky - Jefferson	07/27/15	09/14/15	Familial Status	Discriminatory advertising, statements and notices	Conciliation/settlement successful	\$0
04-15-0869-8	FHAP	Louisville	Kentucky - Jefferson	07/27/15	03/22/16	Sex	Discriminatory terms, conditions, privileges, or services and facilities	Conciliation/settlement successful	\$0
04-15-0876-8	FHAP	Louisville	Kentucky - Jefferson	07/27/15	03/17/16	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to permit reasonable modification	No cause determination	\$0

04-15-0877-8	FHAP	Louisville	Kentucky - Bullitt	07/27/15	11/19/15	National Origin	Discrimination in terms/conditions/privileges relating to rental	No cause determination	\$0
04-15-0882-8	FHAP	Louisville	Kentucky - Jefferson	07/28/15	10/21/15	Disability, Familial Status	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	Conciliation/settlement successful	\$0
04-15-0955-8	FHAP	Louisville	Kentucky - Jefferson	08/17/15	10/09/15	Race	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	\$0
04-15-0986-8	FHAP	Louisville	Kentucky - Jefferson	08/24/15	03/08/16	Sex, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	\$0
04-15-1025-8	FHAP	Louisville	Kentucky - Jefferson	09/01/15		Disability, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Other discriminatory acts; Failure to make reasonable accommodation		\$0
04-15-1029-8	FHAP	Louisville	Kentucky - Jefferson	09/02/15	11/12/15	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to permit reasonable modification; Failure to make reasonable accommodation	Complainant failed to cooperate	\$0
04-15-1032-8	FHAP	Louisville	Kentucky - Jefferson	09/04/15	12/23/15	Race, Disability	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable	No cause determination	\$0
04-15-1040-8	FHAP	Louisville	Kentucky - Jefferson	09/08/15	06/30/16	Race	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental; Discrimination in services and facilities relating to rental	No cause determination	\$0
04-15-1056-8	FHAP	Louisville	Kentucky - Jefferson	09/10/15	10/29/15	Race, National Origin	Discriminatory refusal to rent; Discriminatory advertising, statements and notices; False denial or representation of availability - rental	No cause determination	\$0

04-15-1057-8	FHAP	Louisville	Kentucky - Jefferson	09/10/15	12/03/15	Race	Discrimination in terms/conditions/privileges relating to rental	No cause determination	\$0
04-15-1058-8	FHAP	Louisville	Kentucky - Jefferson	09/10/15	05/19/16	Race	False denial or representation of availability - rental	Conciliation/settlement successful	\$8,000
04-15-1068-8	FHAP	Louisville	Kentucky - Jefferson	09/14/15	02/09/16	Sex	Discrimination in terms/conditions/privileges relating to rental; Discrimination in services and facilities relating to rental	No cause determination	\$0
04-15-1075-8	FHAP	Louisville	Kentucky - Jefferson	09/15/15		Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation		\$0
04-15-1092-8	FHAP	Louisville	Kentucky - Jefferson	09/17/15	11/03/15	Sex	Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	\$0
04-15-1160-8	FHAP	Louisville	Kentucky - Jefferson	09/30/15	11/13/15	Race	Discriminatory terms, conditions, privileges, or services and facilities; Other discriminatory acts	Complainant failed to cooperate	\$0
04-16-0051-8	FHAP	Louisville	Kentucky - Jefferson	10/20/15	12/23/19	Disability	Discriminatory refusal to rent; Discriminatory advertising, statements and notices; Failure to make reasonable accommodation	Conciliation/settlement successful	\$0
04-16-0052-8	FHAP	Louisville	Kentucky - Jefferson	10/20/15	11/15/18	Disability	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable; Failure to make reasonable accommodation	Conciliation/settlement successful	\$500
04-16-0058-8	FHAP	Louisville	Kentucky - Jefferson	10/22/15	12/18/15	National Origin	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	\$0
04-16-0100-8	FHAP	Louisville	Kentucky - Jefferson	10/29/15	02/25/16	Familial Status	Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable	No cause determination	\$0

04-16-0149-8	FHAP	Louisville	Kentucky - Jefferson	11/09/15	12/15/15	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	No cause determination	\$0
04-16-4062-8	FHAP	Louisville	Kentucky - Jefferson	12/02/15	05/19/16	Disability	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental	No cause determination	\$0
04-16-4101-8	FHAP	Louisville	Kentucky - Jefferson	12/14/15	05/25/16	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to permit reasonable modification; Failure to make reasonable accommodation	No cause determination	\$0
04-16-4190-8	FHAP	Louisville	Kentucky - Jefferson	01/22/16	09/20/16	Familial Status	Discriminatory refusal to rent	Conciliation/settlement successful	\$0
04-16-4192-8	FHAP	Louisville	Kentucky - Jefferson	01/22/16	06/06/16	Familial Status	Discriminatory refusal to rent	Conciliation/settlement successful	\$0
04-16-4210-8	FHAP	Louisville	Kentucky - Jefferson	01/26/16	06/29/16	Race, Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental	No cause determination	\$0
04-16-4212-8	FHAP	Louisville	Kentucky - Jefferson	01/26/16	06/14/16	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	\$0
04-16-4272-8	FHAP	Louisville	Kentucky - Jefferson	02/04/16	06/06/16	Familial Status	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental; Restriction of choices relative to a rental	Conciliation/settlement successful	\$0
04-16-4273-8	FHAP	Louisville	Kentucky - Jefferson	02/04/16	09/20/16	Familial Status	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental; Restriction of choices relative to a rental	Conciliation/settlement successful	\$0
04-16-4274-8	FHAP	Louisville	Kentucky - Jefferson	02/04/16	01/24/17	Familial Status	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	\$0
04-16-4300-8	FHAP	Louisville	Kentucky - Jefferson	02/11/16	09/14/16	Race	Discriminatory refusal to rent	No cause determination	\$0

04-16-4305-8	FHAP	Louisville	Kentucky - Jefferson	02/16/16	06/09/16	Race	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental	No cause determination	\$0
04-16-4314-8	FHAP	Louisville	Kentucky - Jefferson	02/18/16	06/10/16	National Origin	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to sale; Discrimination in services and facilities relating to rental	Complaint withdrawn by complainant without resolution	\$0
04-16-4336-8	FHAP	Louisville	Kentucky - Jefferson	02/23/16	03/22/16	Race	Discriminatory refusal to rent; False denial or representation of availability - rental	No cause determination	\$0
04-16-4366-8	FHAP	Louisville	Kentucky - Jefferson	03/02/16	05/27/16	National Origin, Familial Status	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental	Complaint withdrawn by complainant after resolution	\$200
04-16-4392-8	FHAP	Louisville	Kentucky - Jefferson	03/09/16	09/15/16	Race	Discriminatory refusal to rent; Otherwise deny or make housing unavailable	No cause determination	\$0
04-16-4417-8	FHAP	Louisville	Kentucky - Jefferson	03/21/16	05/19/16	Sex	Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable	No cause determination	\$0
04-16-4419-8	FHAP	Louisville	Kentucky - Jefferson	03/21/16	09/15/16	Race	Discrimination in terms/conditions/privileges relating to rental; Discrimination in services and facilities relating to rental	No cause determination	\$0
04-16-4421-8	FHAP	Louisville	Kentucky - Green	03/21/16	11/17/16	Race	Discriminatory advertising, statements and notices; Discrimination in terms and conditions of membership; Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	\$0
04-16-4605-8	FHAP	Louisville	Kentucky - Jefferson	05/02/16	09/30/16	Sex	Discriminatory refusal to rent	No cause determination	\$0
04-16-4674-8	FHAP	Louisville	Kentucky - Jefferson	05/23/16	07/21/16	Race	Discriminatory refusal to rent	No cause determination	\$0

04-16-4675-8	FHAP	Louisville	Kentucky - Jefferson	05/23/16	07/21/16	Race	Discriminatory refusal to rent and negotiate for rental; Discrimination in services and facilities relating to rental	No cause determination	\$0
04-16-4677-8	FHAP	Louisville	Kentucky - Jefferson	05/23/16	11/30/16	Race, National Origin	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	\$0
04-16-4689-8	FHAP	Louisville	Kentucky - Jefferson	05/19/16	01/03/17	Race, Familial Status	Discriminatory refusal to rent; Discriminatory refusal to rent and negotiate for rental; False denial or representation of availability - rental; Discrimination in terms/conditions/privileges relating to rental; Discrimination in services and facilities relating to rental; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	\$0
04-16-4690-8	FHAP	Louisville	Kentucky - Jefferson	05/19/16	10/21/16	Race, Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	No cause determination	\$0
04-16-4699-8	FHAP	Louisville	Kentucky - Jefferson	05/26/16	08/03/16	Sex	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental	No cause determination	\$0
04-16-4749-8	FHAP	Louisville	Kentucky - Jefferson	06/14/16	09/20/16	Familial Status	Discrimination in terms/conditions/privileges relating to rental; Restriction of choices relative to a rental	Conciliation/settlement successful	\$0
04-16-4750-8	FHAP	Louisville	Kentucky - Jefferson	06/14/16	05/09/17	Familial Status	Discrimination in services and facilities relating to rental; Restriction of choices relative to a rental	Conciliation/settlement successful	\$0
04-16-4751-8	FHAP	Louisville	Kentucky - Jefferson	06/14/16	10/14/16	Sex	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental	No cause determination	\$0
04-16-4753-8	FHAP	Louisville	Kentucky - Jefferson	06/14/16	09/20/16	Familial Status	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and	Conciliation/settlement	\$0

							facilities	successful	
04-16-4792-8	FHAP	Louisville	Kentucky - Jefferson	06/22/16	08/16/16	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental	No cause determination	\$0
04-16-4797-8	FHAP	Louisville	Kentucky - Jefferson	06/22/16	11/14/16	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental; Discrimination in services and facilities relating to rental	Complainant failed to cooperate	\$0
04-16-4800-8	FHAP	Louisville	Kentucky - Jefferson	06/22/16	04/11/17	Familial Status	Discriminatory terms, conditions, privileges, or services and facilities	Conciliation/settlement successful	\$0
04-16-4807-8	FHAP	Louisville	Kentucky - Jefferson	06/27/16	09/28/16	Race	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental	No cause determination	\$0
04-16-4853-8	FHAP	Louisville	Kentucky - Green	07/11/16	02/02/17	Retaliation	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental; Discrimination in services and facilities relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	\$0
04-16-4886-8	FHAP	Louisville	Kentucky - Jefferson	07/14/16	09/29/16	Race	Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	\$0
04-16-4891-8	FHAP	Louisville	Kentucky - Jefferson	07/18/16	09/14/16	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to provide accessible and usable public and common user areas	Conciliation/settlement successful	\$0
04-16-4894-8	FHAP	Louisville	Kentucky - Jefferson	07/18/16	10/11/16	Race	Discrimination in terms/conditions/privileges relating to rental	No cause determination	\$0

04-16-4937-8	FHAP	Louisville	Kentucky - Jefferson	07/27/16	10/26/16	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	\$0
04-16-4939-8	FHAP	Louisville	Kentucky - Jefferson	07/27/16	09/14/16	Race	Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	\$0
04-16-4946-8	FHAP	Louisville	Kentucky - Jefferson	08/03/16	04/06/17	Sex	Discrimination in terms/conditions/privileges relating to rental	No cause determination	\$0
04-16-4960-8	FHAP	Louisville	Kentucky - Jefferson	08/08/16	02/02/17	National Origin	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)	Conciliation/settlement successful	\$0
04-16-4961-8	FHAP	Louisville	Kentucky - Jefferson	08/08/16	02/02/17	Disability	Discriminatory refusal to rent	No cause determination	\$0
04-16-4969-8	FHAP	Louisville	Kentucky - Jefferson	08/08/16	02/02/17	Disability	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable	No cause determination	\$0
04-16-4979-8	FHAP	Louisville	Kentucky - Jefferson	08/09/16	12/28/16	Race	Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	\$0
04-16-4986-8	FHAP	Louisville	Kentucky - Jefferson	08/11/16	02/01/17	National Origin, Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental; Discrimination in services and facilities relating to sale; Discrimination in services and facilities relating to rental	No cause determination	\$0
04-16-5008-8	FHAP	Louisville	Kentucky - Jefferson	08/19/16	01/24/17	Race, Sex	Discriminatory terms, conditions, privileges, or services and facilities	Complaint withdrawn by complainant after resolution	\$0
04-16-5114-8	FHAP	Louisville	Kentucky - Jefferson	08/29/16	04/20/17	Race	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental	Dismissed for lack of jurisdiction	\$0

04-16-5155-8	FHAP	Louisville	Kentucky - Jefferson	09/26/16	11/16/16	Disability, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)	Conciliation/settlement successful	\$0
04-16-5265-8	FHAP	Louisville	Kentucky - Jefferson	09/12/16	09/28/16	Disability	Discrimination in the terms/conditions for making loans; Discriminatory terms, conditions, privileges, or services and facilities	Complaint withdrawn by complainant after resolution	\$0
04-16-5434-8	FHAP	Louisville	Kentucky - Jefferson	09/26/16	10/27/16	Familial Status	Discriminatory terms, conditions, privileges, or services and facilities; Restriction of choices relative to a rental	Conciliation/settlement successful	\$0
04-17-5594-8	FHAP	Louisville	Kentucky - Jefferson	10/14/16	05/11/17	Race	Discrimination in terms/conditions/privileges relating to rental; Discrimination in services and facilities relating to rental	No cause determination	\$0
04-17-5673-8	FHAP	Louisville	Kentucky - Jefferson	10/20/16	06/07/17	Race	Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	\$0
04-17-5674-8	FHAP	Louisville	Kentucky - Jefferson	10/20/16	12/28/16	Race	Discriminatory terms, conditions, privileges, or services and facilities	Conciliation/settlement successful	\$0
04-17-5758-8	FHAP	Louisville	Kentucky - Jefferson	10/26/16	06/22/17	Race	Discrimination in terms/conditions/privileges relating to rental	No cause determination	\$0
04-17-5760-8	FHAP	Louisville	Kentucky - Jefferson	10/26/16	02/27/17	National Origin	Discrimination in terms/conditions/privileges relating to rental	No cause determination	\$0
04-17-5761-8	FHAP	Louisville	Kentucky - Jefferson	10/26/16	05/26/17	Disability, Retaliation	Failure to make reasonable accommodation	No cause determination	\$0
04-17-5765-8	FHAP	Louisville	Kentucky - Jefferson	10/26/16	08/02/17	Race	Discriminatory refusal to sell	No cause determination	\$0
04-17-5793-8	FHAP	Louisville	Kentucky - Jefferson	10/28/16	02/01/17	Race	Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	\$0
04-17-5814-8	FHAP	Louisville	Kentucky - Jefferson	10/31/16	06/08/17	Race	Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	\$0

04-17-5853-8	FHAP	Louisville	Kentucky - Jefferson	11/02/16		Race	Discriminatory refusal to rent		\$0
04-17-5893-8	FHAP	Louisville	Kentucky - Jefferson	11/04/16	12/08/16	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	\$0
04-17-6057-8	FHAP	Louisville	Kentucky - Jefferson	11/17/16	02/24/17	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	\$0
04-17-6058-8	FHAP	Louisville	Kentucky - Jefferson	11/17/16	02/01/17	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	\$0
04-17-6237-8	FHAP	Louisville	Kentucky - Jefferson	12/02/16	02/28/17	Disability	Discrimination in the terms/conditions for making loans; Discriminatory terms, conditions, privileges, or services and facilities	Conciliation/settlement successful	\$0
04-17-6238-8	FHAP	Louisville	Kentucky - Jefferson	12/02/16	01/20/17	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	\$0
04-17-6299-8	FHAP	Louisville	Kentucky - Jefferson	12/07/16	08/02/17	Race, Disability	Discrimination in terms/conditions/privileges relating to rental	No cause determination	\$0
04-17-6300-8	FHAP	Louisville	Kentucky - Jefferson	12/07/16	08/02/17	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	\$0
04-17-6301-8	FHAP	Louisville	Kentucky - Jefferson	12/07/16	05/16/19	Disability	Failure to make reasonable accommodation	Unable to locate complainant	\$0
04-17-6397-8	FHAP	Louisville	Kentucky - Jefferson	12/15/16	03/16/17	Race	Discriminatory terms, conditions, privileges, or services and facilities	Complaint withdrawn by complainant after resolution	\$0
04-17-6435-8	FHAP	Louisville	Kentucky - Jefferson	12/19/16	03/15/17	Race	Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	\$0
04-17-6621-8	FHAP	Louisville	Kentucky - Jefferson	01/04/17	02/02/17	Disability	Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	\$0
04-17-6634-8	FHAP	Louisville	Kentucky - Jefferson	01/05/17	06/30/17	Disability	Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	\$0

04-17-6635-8	FHAP	Louisville	Kentucky - Jefferson	01/05/17	06/30/17	Disability	Failure to make reasonable accommodation	No cause determination	\$0
04-17-6653-8	HUD	Louisville	Kentucky - Jefferson	01/06/17	04/25/17	Race, Sex	Discriminatory financing (includes real estate transactions)	Conciliation/settlement successful	\$0
04-17-6742-8	FHAP	Louisville	Kentucky - Jefferson	12/15/16	12/27/19	Race	Discriminatory refusal to sell; Discriminatory refusal to sell and negotiate for sale; Discriminatory refusal to rent; Discrimination in the brokering of residential real property; Discrimination in terms/conditions/privileges relating to sale	Not Selected	\$0
04-17-6798-8	FHAP	Louisville	Kentucky - Jefferson	01/23/17	02/16/17	Race	Discriminatory refusal to rent and negotiate for rental	No cause determination	\$0
04-17-6877-8	FHAP	Louisville	Kentucky - Jefferson	01/27/17	02/28/17	Disability	Discriminatory terms, conditions, privileges, or services and facilities	Conciliation/settlement successful	\$0
04-17-7113-8	FHAP	Louisville	Kentucky - Jefferson	02/16/17	03/10/17	Race	Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	\$0
04-17-7135-8	FHAP	Louisville	Kentucky - Jefferson	02/21/17	05/05/17	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Dismissed for lack of jurisdiction	\$0
04-17-7216-8	FHAP	Louisville	Kentucky - Jefferson	02/27/17	06/07/17	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	\$250
04-17-7360-8	FHAP	Louisville	Kentucky - Jefferson	03/09/17	10/23/17	Race	Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	\$0
04-17-7361-8	FHAP	Louisville	Kentucky - Jefferson	03/09/17	06/02/17	Race	Discrimination in terms/conditions/privileges relating to rental	No cause determination	\$0
04-17-7434-8	FHAP	Louisville	Kentucky - Jefferson	03/16/17	05/11/17	Disability	Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	\$0

04-17-7474-8	FHAP	Louisville	Kentucky - Jefferson	03/20/17	08/02/17	National Origin	Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	\$0
04-17-7693-8	FHAP	Louisville	Kentucky - Jefferson	04/06/17	04/19/17	Disability	Discrimination in terms/conditions/privileges relating to rental	Complaint withdrawn by complainant after resolution	\$0
04-17-7694-8	FHAP	Louisville	Kentucky - Jefferson	04/06/17	07/14/17	Race, Familial Status	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental	No cause determination	\$0
04-17-7793-8	FHAP	Louisville	Kentucky - Jefferson	04/14/17	05/09/17	Disability	Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	\$0
04-17-7896-8	FHAP	Louisville	Kentucky - Jefferson	04/21/17	07/14/17	Race, Disability	Discriminatory terms, conditions, privileges, or services and facilities; Other discriminatory acts	No cause determination	\$0
04-17-8036-8	FHAP	Louisville	Kentucky - Jefferson	05/04/17	06/30/17	National Origin	Discrimination in terms/conditions/privileges relating to rental	Complaint withdrawn by complainant without resolution	\$0
04-17-8240-8	FHAP	Louisville	Kentucky - Jefferson	05/22/17	07/31/17	Disability	Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	\$0
04-17-8474-8	FHAP	Louisville	Kentucky - Jefferson	06/08/17	07/31/17	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	\$0
04-17-8573-8	FHAP	Louisville	Kentucky - Jefferson	06/15/17	06/28/17	Familial Status	Discriminatory refusal to rent and negotiate for rental	Conciliation/settlement successful	\$0
04-17-8637-8	FHAP	Louisville	Kentucky - Jefferson	06/21/17	06/30/17	Familial Status	Discriminatory refusal to rent	Conciliation/settlement successful	\$0
04-17-8756-8	FHAP	Louisville	Kentucky - Jefferson	07/06/17	09/28/17	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental	No cause determination	\$0

04-17-8760-8	FHAP	Louisville	Kentucky - Jefferson	07/06/17	08/31/17	Disability	Discriminatory refusal to rent	Complaint withdrawn by complainant after resolution	\$0
04-17-9293-8	FHAP	Louisville	Kentucky - Jefferson	08/21/17	11/28/17	Race	Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	\$0
04-17-9319-8	FHAP	Louisville	Kentucky - Jefferson	08/22/17	11/21/17	Race, Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in services and facilities relating to rental	No cause determination	\$0
04-17-9495-8	FHAP	Louisville	Kentucky - Jefferson	09/05/17	11/28/17	Disability	Discriminatory terms, conditions, privileges, or services and facilities	Complaint withdrawn by complainant after resolution	\$0
04-18-0055-8	FHAP	Louisville	Kentucky - Jefferson	10/24/17	02/06/18	Disability	Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	\$0
04-18-0136-8	FHAP	Louisville	Kentucky - Jefferson	10/27/17	01/09/18	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	\$0
04-18-0360-8	FHAP	Louisville	Kentucky - Jefferson	11/22/17	03/07/18	Disability	Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	\$0
04-18-0379-8	FHAP	Louisville	Kentucky - Jefferson	11/24/17	03/01/18	Disability	Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable; Failure to make reasonable accommodation	No cause determination	\$0
04-18-0938-8	FHAP	Louisville	Kentucky - Jefferson	01/11/18		Familial Status	Discriminatory refusal to rent	Not Selected	\$0
04-18-1418-8	FHAP	Louisville	Kentucky - Jefferson	02/14/18	05/07/18	Sex	Discriminatory refusal to negotiate for rental	No cause determination	\$0
04-18-1579-8	FHAP	Louisville	Kentucky - Jefferson	02/28/18	04/20/18	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental; Other discriminatory acts	No cause determination	\$0

04-18-1690-8	FHAP	Louisville	Kentucky - Jefferson	03/08/18	09/04/18	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	\$0
04-18-1766-8	FHAP	Louisville	Kentucky - Jefferson	03/14/18	11/28/18	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in services and facilities relating to rental	Conciliation/settlement successful	\$0
04-18-1767-8	FHAP	Louisville	Kentucky - Jefferson	03/14/18	10/23/18	Race, Familial Status	Discriminatory terms, conditions, privileges, or services and facilities	Not Selected	\$0
04-18-1943-8	FHAP	Louisville	Kentucky - Jefferson	03/29/18	04/20/18	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	No cause determination	\$0
04-18-1948-8	FHAP	Louisville	Kentucky - Jefferson	03/29/18	08/15/18	Disability	Discrimination in services and facilities relating to rental; Failure to make reasonable accommodation	No cause determination	\$0
04-18-2098-8	FHAP	Louisville	Kentucky - Jefferson	04/10/18	06/07/18	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	\$0
04-18-2506-8	FHAP	Louisville	Kentucky - Jefferson	05/14/18	07/24/18	National Origin	Discriminatory terms, conditions, privileges, or services and facilities	Unable to locate complainant	\$0
04-18-2586-8	FHAP	Louisville	Kentucky - Jefferson	05/18/18	08/21/18	Familial Status	Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	\$0
04-18-2704-8	FHAP	Louisville	Kentucky - Jefferson	05/30/18	09/05/18	Disability	Discriminatory refusal to rent and negotiate for rental; Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	\$0
04-18-2728-8	FHAP	Louisville	Kentucky - Jefferson	05/31/18	02/18/19	Race	Discrimination in the making of loans; Discrimination in the terms/conditions for making loans	No cause determination	\$0
04-18-2805-8	FHAP	Louisville	Kentucky - Jefferson	06/06/18	08/30/18	Race	Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	\$0

04-18-2970-8	FHAP	Louisville	Kentucky - Jefferson	06/19/18	09/24/18	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Conciliation/settlement successful	\$0
04-18-2971-8	FHAP	Louisville	Kentucky - Jefferson	06/19/18	10/29/18	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Conciliation/settlement successful	\$0
04-18-3604-8	FHAP	Louisville	Kentucky - Jefferson	08/06/18		Disability	Failure to make reasonable accommodation	Not Selected	\$0
04-18-3605-8	FHAP	Louisville	Kentucky - Jefferson	08/06/18		Disability	Failure to make reasonable accommodation	Not Selected	\$0
04-18-3606-8	FHAP	Louisville	Kentucky - Jefferson	08/06/18		Disability	Failure to make reasonable accommodation	Not Selected	\$0
04-18-3607-8	FHAP	Louisville	Kentucky - Jefferson	08/06/18		Disability	Failure to make reasonable accommodation	Not Selected	\$0
04-18-3685-8	FHAP	Louisville	Kentucky - Jefferson	08/10/18	02/11/19	Race	Discrimination in terms/conditions/privileges relating to rental	No cause determination	\$0
04-18-3939-8	FHAP	Louisville	Kentucky - Jefferson	08/28/18	10/26/18	Disability, Familial Status	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	No cause determination	\$0
04-18-3946-8	FHAP	Louisville	Kentucky - Jefferson	08/29/18	03/11/19	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Complainant failed to cooperate	\$0
04-18-4133-8	FHAP	Louisville	Kentucky - Jefferson	09/14/18	10/31/18	Race, Sex, Disability	Discrimination in terms/conditions/privileges relating to rental	No cause determination	\$0
04-18-4292-8	FHAP	Louisville	Kentucky - Jefferson	09/27/18	01/02/19	Disability	Failure to make reasonable accommodation	No cause determination	\$0
04-18-9836-8	FHAP	Louisville	Kentucky - Jefferson	10/05/17	04/10/18	Race, Sex, Retaliation	Other discriminatory acts	No cause determination	\$0
04-18-9853-8	FHAP	Louisville	Kentucky - Jefferson	10/06/17	12/14/17	Disability	Failure to make reasonable accommodation	No cause determination	\$0
04-19-4345-8	FHAP	Louisville	Kentucky - Jefferson	10/02/18	10/30/18	Disability, Familial Status	Failure to make reasonable accommodation	Conciliation/settlement successful	\$0

04-19-4346-8	FHAP	Louisville	Kentucky - Jefferson	10/02/18	11/06/18	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	\$0
04-19-4347-8	FHAP	Louisville	Kentucky - Jefferson	10/02/18	12/17/18	Familial Status	Discriminatory refusal to rent	Conciliation/settlement successful	\$0
04-19-4348-8	FHAP	Louisville	Kentucky - Jefferson	10/02/18	11/30/18	Familial Status	Discriminatory refusal to rent	Conciliation/settlement successful	\$0
04-19-4349-8	FHAP	Louisville	Kentucky - Jefferson	10/02/18	12/26/18	Disability	Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	\$0
04-19-4468-8	FHAP	Louisville	Kentucky - Jefferson	10/12/18	01/17/19	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	No cause determination	\$0
04-19-4470-8	FHAP	Louisville	Kentucky - Jefferson	10/12/18	01/16/19	Disability	Discriminatory terms, conditions, privileges, or services and facilities	Conciliation/settlement successful	\$0
04-19-4654-8	FHAP	Louisville	Kentucky - Jefferson	10/25/18	01/17/19	Race, Familial Status	Discriminatory refusal to sell and negotiate for sale; Discrimination in terms/conditions/privileges relating to sale; Otherwise deny or make housing unavailable	No cause determination	\$0
04-19-4960-8	FHAP	Louisville	Kentucky - Jefferson	11/16/18	01/22/19	Retaliation	Other discriminatory acts	No cause determination	\$0
04-19-4961-8	FHAP	Louisville	Kentucky - Jefferson	11/16/18	01/30/19	Disability	Discriminatory refusal to rent	Conciliation/settlement successful	\$0
04-19-4964-8	FHAP	Louisville	Kentucky - Jefferson	11/16/18	01/23/19	Race	Discriminatory refusal to rent and negotiate for rental	No cause determination	\$0
04-19-5085-8	FHAP	Louisville	Kentucky - Jefferson	11/28/18	03/04/19	Familial Status	Discriminatory terms, conditions, privileges, or services and facilities	Complainant failed to cooperate	\$0
04-19-5086-8	FHAP	Louisville	Kentucky - Jefferson	11/28/18	02/27/19	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	No cause determination	\$0

04-19-5195-8	FHAP	Louisville	Kentucky - Jefferson	12/07/18	03/12/19	Familial Status	Discriminatory refusal to rent	Complainant failed to cooperate	\$0
04-19-5410-8	FHAP	Louisville	Kentucky - Jefferson	12/21/18		Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation		\$0
04-19-5447-8	FHAP	Louisville	Kentucky - Jefferson	01/28/19	04/30/19	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	Complainant failed to cooperate	\$0
04-19-5451-8	FHAP	Louisville	Kentucky - Jefferson	01/28/19	02/26/19	National Origin	Discriminatory refusal to rent; Discriminatory refusal to rent and negotiate for rental	No cause determination	\$0
04-19-5470-8	FHAP	Louisville	Kentucky - Pike	01/28/19	03/22/19	Disability, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental	No cause determination	\$0
04-19-5473-8	FHAP	Louisville	Kentucky - Jefferson	01/28/19	04/11/19	Retaliation	Discrimination in terms/conditions/privileges relating to rental	No cause determination	\$0
04-19-5474-8	FHAP	Louisville	Kentucky - Jefferson	01/28/19	06/27/19	Familial Status	Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	\$0
04-19-5475-8	FHAP	Louisville	Kentucky - Jefferson	01/28/19	03/14/19	Disability	Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	\$0
04-19-5476-8	FHAP	Louisville	Kentucky - Jefferson	01/28/19	06/12/19	Disability	Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	\$0
04-19-5477-8	FHAP	Louisville	Kentucky - Jefferson	01/28/19	04/30/19	Sex	Other discriminatory acts	Complainant failed to cooperate	\$0
04-19-5481-8	FHAP	Louisville	Kentucky - Jefferson	01/28/19	04/17/19	Retaliation	Discrimination in terms/conditions/privileges relating to rental	No cause determination	\$0
04-19-5553-8	FHAP	Louisville	Kentucky - Jefferson	01/31/19	07/16/19	Sex	Discrimination in terms/conditions/privileges relating to rental	No cause determination	\$0

04-19-5666-8	FHAP	Louisville	Kentucky - Jefferson	02/08/19	05/31/19	Sex, Retaliation	Discrimination in terms/conditions/privileges relating to rental	No cause determination	\$0
04-19-5667-8	FHAP	Louisville	Kentucky - Jefferson	02/08/19	07/10/19	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	\$0
04-19-5768-8	FHAP	Louisville	Kentucky - Jefferson	02/14/19	04/26/19	Disability	Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	\$0
04-19-5769-8	FHAP	Louisville	Kentucky - Jefferson	02/14/19		Disability	Discriminatory terms, conditions, privileges, or services and facilities		\$0
04-19-5770-8	FHAP	Louisville	Kentucky - Jefferson	02/14/19	03/19/19	Disability	Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	\$0
04-19-5771-8	FHAP	Louisville	Kentucky - Jefferson	02/14/19	03/21/19	Disability	Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	\$0
04-19-5772-8	FHAP	Louisville	Kentucky - Jefferson	02/14/19	05/24/19	Familial Status	Discriminatory refusal to rent	Conciliation/settlement successful	\$0
04-19-5773-8	FHAP	Louisville	Kentucky - Jefferson	02/14/19	02/27/19	Disability	Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	\$0
04-19-5876-8	FHAP	Louisville	Kentucky - Jefferson	02/22/19	05/31/19	Race	Discrimination in terms/conditions/privileges relating to rental	Complainant failed to cooperate	\$0
04-19-6044-8	FHAP	Louisville	Kentucky - Jefferson	03/07/19	07/05/19	Race	Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	\$0
04-19-6045-8	FHAP	Louisville	Kentucky - Jefferson	03/07/19	06/14/19	National Origin, Disability	Discriminatory terms, conditions, privileges, or services and facilities	Conciliation/settlement successful	\$0
04-19-6292-8	FHAP	Louisville	Kentucky - Jefferson	03/26/19	08/05/19	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	No cause determination	\$0
04-19-6293-8	FHAP	Louisville	Kentucky - Jefferson	03/26/19	06/26/19	Disability	Discrimination in terms/conditions/privileges	Complainant failed to	\$0

							relating to rental	cooperate	
04-19-6341-8	FHAP	Louisville	Kentucky - Jefferson	03/29/19	07/25/19	Race, National Origin	Discrimination in terms/conditions/privileges relating to rental	No cause determination	\$0
04-19-6533-8	FHAP	Louisville	Kentucky - Jefferson	04/10/19	07/03/19	Disability	Discriminatory refusal to rent and negotiate for rental	Conciliation/settlement successful	\$0
04-19-6534-8	FHAP	Louisville	Kentucky - Jefferson	04/10/19	11/07/19	Familial Status	Discriminatory refusal to rent	No cause determination	\$0
04-19-6535-8	FHAP	Louisville	Kentucky - Jefferson	04/10/19	06/27/19	Familial Status	Discriminatory refusal to rent and negotiate for rental	Conciliation/settlement successful	\$0
04-19-6585-8	FHAP	Louisville	Kentucky - Jefferson	04/15/19	07/19/19	Disability	Discrimination in terms/conditions/privileges relating to rental	No cause determination	\$0
04-19-6647-8	FHAP	Louisville	Kentucky - Jefferson	04/18/19		Disability	Discrimination in terms/conditions/privileges relating to rental		\$0
04-19-6766-8	FHAP	Louisville	Kentucky - Jefferson	04/26/19	08/06/19	Disability	Discrimination in terms/conditions/privileges relating to rental	No cause determination	\$0
04-19-6785-8	HUD	Louisville	Kentucky - Jefferson	04/29/19	08/29/19	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Failure to make reasonable accommodation	Conciliation/settlement successful	\$5,000
04-19-6966-8	FHAP	Louisville	Kentucky - Jefferson	05/10/19	08/01/19	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	No cause determination	\$0
04-19-6969-8	FHAP	Louisville	Kentucky - Green	05/10/19	08/16/19	Race	Discrimination in terms/conditions/privileges relating to rental	No cause determination	\$0
04-19-6972-8	FHAP	Louisville	Kentucky - Jefferson	05/10/19	09/19/19	Retaliation	Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	\$0

04-19-7044-8	FHAP	Louisville	Kentucky - Jefferson	05/16/19	08/30/19	Disability	Discriminatory refusal to rent; Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	\$0
04-19-7064-8	FHAP	Louisville	Kentucky - Jefferson	05/17/19	07/05/19	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Conciliation/settlement successful	\$0
04-19-7213-8	FHAP	Louisville	Kentucky - Jefferson	05/31/19		Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation		\$0
04-19-7284-8	FHAP	Louisville	Kentucky - Jefferson	06/07/19	10/04/19	Race	Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	\$0
04-19-7467-8	FHAP	Louisville	Kentucky - Jefferson	06/20/19	09/20/19	National Origin	Discrimination in terms/conditions/privileges relating to rental	No cause determination	\$0
04-19-7643-8	FHAP	Louisville	Kentucky - Jefferson	07/01/19	08/08/19	Disability	Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	\$0
04-19-7644-8	FHAP	Louisville	Kentucky - Jefferson	07/01/19	07/24/19	Disability	Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	\$0
04-19-7645-8	FHAP	Louisville	Kentucky - Jefferson	07/01/19	09/17/19	Disability	Discriminatory refusal to rent and negotiate for rental; Failure to make reasonable accommodation	Conciliation/settlement successful	\$0
04-19-7646-8	FHAP	Louisville	Kentucky - Jefferson	07/01/19	10/18/19	Disability	Discriminatory refusal to rent and negotiate for rental; Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	\$0
04-19-7947-8	FHAP	Louisville	Kentucky - Jefferson	07/24/19	10/25/19	Disability	Failure to provide accessible and usable public and common user areas	Conciliation/settlement successful	\$0
04-19-7948-8	FHAP	Louisville	Kentucky - Jefferson	07/24/19	07/24/19	Race	Discriminatory terms, conditions, privileges, or services and facilities	Complaint withdrawn by complainant without resolution	\$0

04-19-7949-8	FHAP	Louisville	Kentucky - Jefferson	07/24/19	12/27/19	Disability	Discriminatory refusal to rent; False denial or representation of availability - rental; Discrimination in terms/conditions/privileges relating to rental	No cause determination	\$0
04-19-7950-8	FHAP	Louisville	Kentucky - Jefferson	07/24/19	10/23/19	Sex	Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	\$0
04-19-7952-8	FHAP	Louisville	Kentucky - Jefferson	07/24/19	10/24/19	National Origin	Discrimination in terms/conditions/privileges relating to rental	No cause determination	\$0
04-19-7958-8	FHAP	Louisville	Kentucky - Jefferson	07/24/19		Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)		\$0
04-19-8024-8	FHAP	Louisville	Kentucky - Jefferson	07/30/19	11/04/19	Race	Discrimination in terms/conditions/privileges relating to rental	No cause determination	\$0
04-19-8165-8	FHAP	Louisville	Kentucky - Jefferson	08/08/19		Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in services and facilities relating to rental; Failure to make reasonable accommodation		\$0
04-19-8206-8	FHAP	Louisville	Kentucky - Jefferson	08/12/19		Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.); Failure to permit reasonable modification		\$0
04-19-8488-8	FHAP	Louisville	Kentucky - Jefferson	08/30/19		Familial Status	Discriminatory refusal to rent		\$0
04-19-8489-8	FHAP	Louisville	Kentucky - Jefferson	08/30/19	11/19/19	Disability	Discrimination in terms/conditions/privileges relating to rental	No cause determination	\$0
04-19-8490-8	FHAP	Louisville	Kentucky - Jefferson	08/30/19		Familial Status	Discriminatory refusal to rent		\$0
04-19-8491-8	FHAP	Louisville	Kentucky - Jefferson	08/30/19	10/11/19	Disability	Discriminatory refusal to rent and negotiate for rental	Conciliation/settlement successful	\$0

04-19-8492-8	FHAP	Louisville	Kentucky - Jefferson	08/30/19		Familial Status	Discriminatory refusal to rent and negotiate for rental; Discrimination in terms/conditions/privileges relating to rental		\$0
04-19-8493-8	FHAP	Louisville	Kentucky - Jefferson	08/30/19	12/06/19	National Origin	Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	\$0
04-19-8632-8	FHAP	Louisville	Kentucky - Jefferson	09/11/19	11/14/19	Disability	Discriminatory refusal to rent and negotiate for rental	No cause determination	\$0
04-19-8633-8	FHAP	Louisville	Kentucky - Jefferson	09/11/19	11/19/19	Disability	Discriminatory refusal to rent	Conciliation/settlement successful	\$0
04-19-8634-8	FHAP	Louisville	Kentucky - Jefferson	09/11/19	11/19/19	Disability	Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	\$0
04-19-8635-8	FHAP	Louisville	Kentucky - Jefferson	09/11/19	09/27/19	Disability	Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	\$0
04-19-8639-8	FHAP	Louisville	Kentucky - Jefferson	09/11/19	09/27/19	Disability	Discriminatory terms, conditions, privileges, or services and facilities	Conciliation/settlement successful	\$0
04-19-8711-8	FHAP	Louisville	Kentucky - Jefferson	09/17/19	12/19/19	Disability, Familial Status	Discrimination in services and facilities relating to rental; Failure to make reasonable accommodation	No cause determination	\$0
04-19-8725-8	FHAP	Louisville	Kentucky - Jefferson	09/18/19	12/23/19	Race	Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	\$0
04-20-0151-8	FHAP	Louisville	Kentucky - Jefferson	01/08/20		Race	Discriminatory refusal to negotiate for sale; Discrimination in the terms/conditions for making loans; Otherwise deny or make housing unavailable		\$0
04-20-0189-8	FHAP	Louisville	Kentucky - Jefferson	01/10/20		Disability	Failure to make reasonable accommodation		\$0
04-20-9156-8	FHAP	Louisville	Kentucky - Jefferson	10/17/19	11/07/19	Disability	Discriminatory refusal to rent	Conciliation/settlement successful	\$0

04-20-9157-8	FHAP	Louisville	Kentucky - Jefferson	10/17/19		Disability	Discriminatory refusal to rent and negotiate for rental		\$0
04-20-9160-8	FHAP	Louisville	Kentucky - Jefferson	10/17/19		Disability	Discriminatory refusal to rent		\$0
04-20-9161-8	FHAP	Louisville	Kentucky - Jefferson	10/17/19	11/27/19	Disability	Discriminatory refusal to rent	Conciliation/settlement successful	\$0
04-20-9162-8	FHAP	Louisville	Kentucky - Jefferson	10/17/19	12/12/19	Disability	Discriminatory refusal to rent	Conciliation/settlement successful	\$0
04-20-9163-8	FHAP	Louisville	Kentucky - Jefferson	10/17/19	10/29/19	Familial Status	Discriminatory refusal to rent and negotiate for rental	Untimely Filed	\$0
04-20-9191-8	FHAP	Louisville	Kentucky - Jefferson	10/21/19		Disability	Discriminatory refusal to rent		\$0
04-20-9514-8	FHAP	Louisville	Kentucky - Jefferson	11/13/19		Disability, Familial Status	Discriminatory refusal to negotiate for rental		\$0
04-20-9516-8	FHAP	Louisville	Kentucky - Jefferson	11/13/19		Disability	Discriminatory terms, conditions, privileges, or services and facilities		\$0
04-20-9614-8	FHAP	Louisville	Kentucky - Jefferson	11/20/19		Disability	Discriminatory refusal to rent		\$0
04-20-9788-8	FHAP	Louisville	Kentucky - Jefferson	12/05/19		Race	Discrimination in terms/conditions/privileges relating to rental		\$0
04-20-9812-8	FHAP	Louisville	Kentucky - Jefferson	12/06/19		Sex	Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable		\$0
04-20-9930-8	FHAP	Louisville	Kentucky - Jefferson	12/17/19		Sex, Disability	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.)		\$0
04-20-9948-8	FHAP	Louisville	Kentucky - Jefferson	12/18/19		Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation		\$0

04-20-9952-8	FHAP	Louisville	Kentucky - Jefferson	12/19/19		Disability	Discriminatory terms, conditions, privileges, or services and facilities		\$0
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Louisville Metro Human Rights Commission (LMHRC)

The Louisville Metro Human Relations Commission (LMHRC) receives complaints from individuals who believe that they have been subject to unlawful housing discrimination. The process begins with the complainant signing the complaint and having sworn to the fact that the complaint is true. Next the complaint is filed with the Commission. Once filed, the complaint is assigned to a compliance officer for investigation.

During the period January 2015 through December 2019, the LMHRC docketed a total of 232 new housing discrimination complaints with allegations based on disability (123) accounting for the largest proportion, which includes service animals. Race (49), familial status (45), and sex (22) were the next three largest categories of complaints. This is demonstrative of the current trend for more filings of disability cases than race cases as had been the pattern in the past.

During the period January 2015 through December 2019, the Commission closed 223 housing discrimination cases with 106 found to have no probable cause; and the remaining cases were found to have probable cause OR the parties agreed to a settlement OR the complainant withdrew his or her case OR it was administratively closed OR was litigated.

The LMHRC conducts outreach when possible with its small staff and has a full-time education & outreach coordinator on staff. The LMHRC sponsors at least one event in April of each year for Fair Housing Month and others throughout the year. Staff participates in other events and trainings throughout each year.

The County Attorney's office prosecutes fair housing complaints that have been investigated and deemed to have merit, including those cases where the complaint arises from a protected class that is only covered by local ordinance or if the threshold number of rental units is below the federal threshold, but meets the local threshold.

Louisville Metro Human Relations Commission Housing Cases

	2015		2016		2017		2018		2019	
Cases Opened	46		44		30		38		74	
Race	9	19%	18	40%	8	26%	5	13%	9	12%
Religion	1	2%	0	0%	0	0%	0	0%	0	0%
Age	0	0%	0	0%	0	0%	0	0%	0	0%
Sex	6	13%	5	11%	2	6%	3	7%	6	8%
Sexual Orientation	0	0%	0	0%	0	0%	0	0%	0	0%
Gender Identity	0	0%	0	0%	0	0%	0	0%	0	0%
Disability	22	47%	13	29%	20	66%	24	63%	44	59%
Familial Status	13	28%	8	18%	3	10%	9	23%	12	16%
National Origin	2	4%	3	6%	1	3%	2	5%	5	6%
Color	0	0%	0	0%	0	0%	0	0%	0	0%
Retaliation	0	0%	0	0%	1	3%	1	2%	4	5%

	2015		2016		2017		2018		2019	
Cases Closed	44		49		44		23		83	
No Probable Cause	17	39%	25	51%	19	43%	14	61%	31	37%
Conciliations	17	39%	16	33%	15	34%	8	35%	35	42%
Withdrawals	1	2%	0	0%	5	11%	0	0%	3	3%
Admin. Closures	3	7%	4	8%	3	7%	0	0%	7	8%
Probable Cause	6	13%	4	8%	2	5%	1	4%	7	8%

Kentucky Commission on Human Rights (KCHR)

TRENDS IN FAIR HOUSING COMPLAINTS AND ENFORCEMENT

The Kentucky Commission on Human Rights is the state government authority that protects people from discrimination by enforcing laws that guarantee civil rights. The agency receives, initiates, investigates, and rules upon complaints alleging violations of the Kentucky Civil Rights Act. When the Kentucky General Assembly and Governor Bert Combs created the Commission in 1960, the job of the agency was to encourage fair treatment, foster mutual understanding and respect, and discourage discrimination against any racial or ethnic group or its members. In 1966, the Commission's role expanded with the passage of the Kentucky Civil Rights Act (Kentucky Revised Statutes Chapter 344). This law made discrimination illegal, and gave the Kentucky Commission on Human Rights the statutory authority to enforce the law for the people of the Commonwealth of Kentucky. The law made Kentucky the first state in the south to prohibit discrimination.

The Kentucky Commission on Human Rights (KCHR) has statewide jurisdiction to enforce the Kentucky Civil Rights Act (KCRA). The Kentucky Civil Rights Act makes it unlawful to discriminate against people. The law defines discrimination as any direct or indirect act or practice of exclusion, distinction, restriction, segregation, limitation, refusal, denial, or any other act or practice of differentiation or preference in the treatment of a person or persons, or the aiding, abetting, inciting, coercing or compelling thereof made unlawful under this law.

The KCRA prohibits housing discrimination based on race, color, national origin, religion, sex, familial status and disability. Housing discrimination complaints under the KCRA must be filed within one year from the date of violation. In cases where a local commission may have concurrent jurisdiction, KCHR will advise the complainant of his/her right to file the complaint with the local commission. Some local commissions have additional protected classes not covered by KCRA, such as sexual orientation and gender identity. In such cases, KCHR will refer the complainant to the appropriate local commission.

Since obtaining enforcement powers in 1966, KCHR has received, investigated and adjudicated virtually every kind of housing discrimination case. This includes disparate treatment in obtaining apartments, unfair and discriminatory enforcement of landlord rules, policies and eviction proceedings, sexual and/or racial harassment, denials of requests by disabled tenants for reasonable accommodations and/or modifications, denials by landlords to permit disabled tenants to have service or emotional support animals and, discriminatory lending practices.

KCHR receives, investigates and adjudicates cases of alleged discrimination based on all of the protected classes within the KCRA, including race, color, national origin, disability, sex, and familial status. The numbers and types of housing discrimination claims received by the KCHR are fairly uniform throughout the year.

Since January 1, 2015, the KCHR has filed 303 Fair Housing Complaints.

Complaints filed broke down by basis

BASIS	NUMBER OF COMPLAINTS
Disability	157
Sex	24
Retaliation	1
Race or Color	48
National Origin	18
Familial Status	16
2 or more basis	28
3 or more basis	8
Total # of Complaints filed since January 1, 2015	303

KCHR has been subjected to consistent budget cuts over the past five years. The Commission currently has 16 employees, leaving staff to assume several roles at once. The Education and Outreach department is currently serving as the agencies Intake Officers which limits that amount of Education and Outreach duties they can perform. Under this new staff structure, cases are taking much longer to process and complainants are often frustrated by the process. Some even choose not to engage in the long process.

The number of housing complaints has decreased over the last several years. This could be the result of reduced staff.

Once a housing discrimination complaint is filed with the KCHR, the case is assigned to an investigator who generally completes the investigation within 100 days, during which the parties will have an opportunity to conciliate all claims. If the parties fail to conciliate during investigation, the case will either be dismissed on a finding of no probable cause (NPC) or transferred to the legal unit to prepare a formal charge of discrimination. Once the case is transferred to the legal unit, the parties may conciliate, adjudicate or pursue the case in the appropriate circuit court.

Of those 303 complaints filed, 242 of them have been resolved. The remaining 61 open cases are pending investigation or currently being litigated.

CLOSURE TYPE	NUMBER OF CLOSURES
Administrative Closures	2
Conciliations	61
Dismissal w/out Prejudice	10
No Probable Cause	130
Withdrawal with Settlement	29
Withdrawal without Settlement	10
Total Number of Resolutions	242

The Commission is mandated to educate the public about the laws against discrimination and the benefits of equality. The agency conducts a comprehensive program of collaboration, communications, education, outreach, and training to vigorously carry out this task.

KCHR engages in both internal and outside training opportunities. Housing Enforcement Officers and Housing Intake Staff have received Fair Housing training utilizing training funds from HUD. KCHR also provides Fair Housing training, EEO training and Conciliation training to outside entities.

CASES FILED SINCE JANUARY 1, 2015

BASIS	ISSUE	INCIDENT DATE	DATE FILED	HOW RESOLVED BY COMMISSIONERS	DATE OF ORDER
Religion, Disability & Familial Status	Denied Full and Equal Enjoyment	12/29/2014	1/8/2015	NPC	3/17/2016
Disability	Denied Full and Equal Enjoyment	1/7/2015	1/16/2015	Dismissal without Pred.	5/21/2015
Disability	Denied Full and Equal Enjoyment	1/26/2015 cont.	2/10/2015	Conciliated	8/20/2015

Disability	Denied Full and Equal Enjoyment	10/15/2014	2/10/2015	Conciliated	11/16/2017
Disability	Denied Full and Equal Enjoyment	1/30/2015	2/27/2015	Withdrawal w/Settlement	8/20/2015
Race, Sex	Denied Full and Equal Enjoyment	6/26/2013	3/2/2015	Conciliation	2/18/2016
Disability	Denied Full and Equal Enjoyment	3/3/2015	3/25/2015	Withdrawal w/Settlement	5/21/2015
National Origin	Denied Full and Equal Enjoyment	2/1/2015	4/21/2015	Dismissal without Pred.	11/19/2015

Disability	Denied Full and Equal Enjoyment	4/1/2015	4/30/2015	Conciliated	11/19/2015
Familial Status	Denied Full and Equal Enjoyment	4/23/2015	4/30/2015	Conciliated	9/17/2015
Familial Status	Denied Full and Equal Enjoyment	4/18/2015	5/6/2015	NPC	8/20/2015
Disability	Denied Full and Equal Enjoyment	2/13/2015	5/12/2015	Conciliated	11/16/2017
Disability	Eviction	4/27/2015	5/18/2015	Conciliated	11/16/2017

Retaliation	Denied Full and Equal Enjoyment	1/5/2015	6/2/2015	NPC	11/19/2015
Disability	Denied Full and Equal Enjoyment	1/5/2015	6/5/2015	NPC	11/19/2015
Disability	Denied Full and Equal Enjoyment	2/19/2015	6/8/2015	NPC	8/20/2015
Disability, Age	Denied Full and Equal Enjoyment	2/16/2015	6/8/2015	NPC	8/20/2015
Disability	Denied Full and Equal Enjoyment	6/24/2015	6/29/2015	NPC	3/17/2016

National Origin	Denied Full and Equal Enjoyment	3/1/2015	6/29/2015	NPC	11/19/2015
Race, National Origin	Denied Full and Equal Enjoyment	4/21/2015	6/30/2015	NPC	11/19/2015
Race, National Origin	Denied Full and Equal Enjoyment	4/21/2015	6/30/2015	NPC	1/26/2016
Disability	Denied a reasonable accommodation	5/18/2015	7/13/2015	Conciliation	1/26/2016
Race	Denied Full and Equal Enjoyment	4/11/2015	7/13/2015	Conciliation	5/19/2016

Disability	Denied reasonable accommodation	3/3/2015	7/13/2015	NPC	11/19/2015
Race	Denied Full and Equal Enjoyment	6/1/2015	7/13/2015	Withdrawal w/settlement	3/17/2016
Sex	Sexual Harassment	5/13/2015	7/15/2015	Conciliated	3/17/2016
Disability	Denied Full and Equal Enjoyment	7/17/2014	7/15/2015	Conciliation	1/26/2016
Familial Status	Refused to Rent	4/7/2015	7/20/2015	Conciliated	9/17/2015

Familial Status	Excluding Families with Children	4/7/2015	7/24/2015	Conciliated	3/17/2016
Sex	Differential Treatment	7/20/2015	8/5/2015	Withdrawal	2/18/2016
Disability	Non-refundable emotional support pet fee.	5/13/2015	8/10/2015	Conciliated	9/15/2016
Disability	Refuses to allow support animals on property.	5/11/2015	8/12/2015	Conciliated	6/15/2017
Disability	Non-refundable emotional support pet fee.	5/13/2015	8/12/2015		

Disability	Charges a pet fee for emotional support Animals	5/11/2015	8/12/2015		
Disability	Refuses to rent to individual w/ emotional support Animals	5/11/2015	8/13/2015	Conciliated	11/19/2015
Sex	Sexual Harassment	7/29/2015	8/14/2015	NPC	11/19/2015
Race	Evicted	5/27/2015	8/18/2015	NPC	11/19/2015
Disability	Denied Full and Equal Enjoyment	6/21/2014-continung	8/18/2015	Withdrawal	2/18/2016

Disability	Denied Full and Equal Enjoyment	6/21/2014-continung	8/18/2015	Withdrawal	2/18/2016
Disability	Lease Termination	7/24/2015	8/20/2015	NPC	11/19/2015
Disability	Disability	5/8/2015	8/20/2015		
Disability	Refuses to rent to individual w/ Emotional Support Animals	10/14/2014	8/20/2015		
Disability	Threaten to Evict	7/31/2015	9/1/2015	Conciliated	3/17/2016

Sex	Denied Full and Equal Enjoyment	3/1/2015	9/21/2015	NPC	4/21/2016
Disability	Evicted	2/9/2015	9/25/2015	NPC	3/17/2016
Race	Evicted	9/10/2015	9/25/2015	NPC	4/21/2016
Disability, Sex	Denied Full and Equal Enjoyment	9/9/2015	9/30/2015	NPC	4/21/2016
Disability	Denied Full and Equal Enjoyment	8/9/2015	10/8/2015	Conciliation	6/16/2016

Disability	Denied Full and Equal Enjoyment	9/22/2015	10/12/2015	NPC	1/26/2016
Disability	Denied Full and Equal Enjoyment	9/23/2015	10/16/2015	Conciliated	9/15/2016
Disability	Denied Full and Equal Enjoyment	10/20/2014	10/16/2015	Post Cause Conciliation	11/15/2018
Disability	Denied Full and Equal Enjoyment	10/20/2014	10/16/2015		
Disability	Denied Full and Equal Enjoyment	9/28/2015	10/19/2015	NPC	5/19/2016

Disability	Denied Full and Equal Enjoyment	5/18/2015	11/10/2015	Conciliation	5/19/2016
Disability	Denied Full and Equal Enjoyment	10/15/2015	11/10/2015		
Race, Religion, National Origin & Sex	Denied Full and Equal Enjoyment	6/3/2015	11/18/2015	NPC	2/18/2016
National Origin	Denied Full and Equal Enjoyment	10/6/2015	11/24/2015	NPC	4/21/2016
Disability	Denied Full and Equal Enjoyment	11/4/2015	12/16/2015	Conciliation	6/16/2016

Race, National Origin	Denied Full and Equal Enjoyment	11/15/2015	1/4/2016	NPC	9/15/2016
Disability	Harassment	11/9/2015	1/25/2016	NPC	6/16/2016
Disability	Harassment	8/31/2015	2/11/2016	NPC	6/16/2016
National Origin, Familial Status	Lease Termination	4/24/2015	2/11/2016	NPC	6/16/2016
Race	Denied Full and Equal Enjoyment	1/7/2016	2/11/2016	NPC	4/21/2016

Disability	Denied Full and Equal Enjoyment	12/18/2015	2/22/2016	NPC	6/16/2016
National Origin	Denied Full and Equal Enjoyment	7/16/2015	2/22/2016	NPC	5/19/2016
Race	Denied Full and Equal Enjoyment	7/29/2015	2/22/2016	NPC	9/15/2016
Race	Denied Full and Equal Enjoyment	1/20/2016	2/22/2016	NPC	9/15/2016
Disability	Denied Full and Equal Enjoyment	2/4/2016	2/24/2016	Conciliation	11/16/2017

Race	Denied Full and Equal Enjoyment	2/4/2016	3/3/2016	Conciliated	11/16/2017
Disability	Evicted	1/19/2016	3/3/2016	NPC	9/15/2016
Race	Denied Full and Equal Enjoyment	2/1/2016	3/3/2016	NPC	9/15/2016
Sex	Evicted	1/27/2016	3/3/2016	NPC	5/19/2016
Race	Evicted	2/18/2016	3/8/2016	NPC	9/15/2016

Sex	Differential Treatment	2/11/2016	3/8/2016	NPC	9/15/2016
Disability	Harassment	1/22/2016	3/14/2016	NPC	11/17/2016
Race, Religion, National Origin	Differential Treatment	2/18/2016	3/14/2016	NPC	1/19/2017
Disability	Evicted	11/16/2015	3/24/2016	Conciliated	5/20//2017
Race	Denied Full and Equal Enjoyment	3/28/2016	4/11/2016	Conciliated	9/15/2016

Disability	Denied Reasonable Accommodation	3/28/2016	4/11/2016	Withdrawal w/Settlement	4/20/2017
Sex	Differential Treatment	2/16/2016	4/11/2016		
Religion, Disability & Familial Status	Denied Full and Equal Enjoyment	5/5/2015	4/14/2016	NPC	11/17/2016
Religion, Disability & Familial Status	Denied Full and Equal Enjoyment	4/2/2016	4/14/2016	NPC	11/17/2016
National Origin	Denied Full and Equal Enjoyment	3/22/2016	4/14/2016	Withdrawal w/Settlement	1/19/2017

National Origin	Denied Full and Equal Enjoyment	2/11/2016	4/14/2016	Withdrawal w/Settlement	1/19/2017
National Origin	Denied Full and Equal Enjoyment	2/11/2016	4/14/2016	Withdrawal w/Settlement	1/19/2017
National Origin	Denied Full and Equal Enjoyment	2/11/2016	4/14/2016	Withdrawal w/Settlement	1/19/2017
National Origin	Denied Full and Equal Enjoyment	2/11/2016	4/14/2016	Withdrawal w/Settlement	1/19/2017
National Origin	Denied Full and Equal Enjoyment	2/11/2016	4/14/2016	Withdrawal w/Settlement	1/19/2017

Disability	Denied Full and Equal Enjoyment	4/2/2016	4/14/2016		
Disability	Eviction	4/12/2016	4/19/2016	NPC	9/15/2016
Race	Denied Full and Equal Enjoyment	4/30/2015	4/22/2016	NPC	11/17/2016
Race, Familial status	Denied Full and Equal Enjoyment	4/9/2016	5/4/2016	NPC	1/19/2017
Disability, Race	Denied Full and Equal Enjoyment	3/11/2016	5/4/2016	NPC	11/17/2016

Disability	Denied Full and Equal Enjoyment	4/8/2016	5/18/2016	NPC	1/19/2017
Sex	Denied Full and Equal Enjoyment	4/22/2016	5/31/2016	NPC	3/16/2017
Disability	Denied Full and Equal Enjoyment	4/29/2016	6/1/2016		
Disability	Denied Full and Equal Enjoyment	5/25/2016	6/7/2016	Conciliated	3/15/2018
Race, Retaliation	Denied Full and Equal Enjoyment	1/15/2016	6/14/2016	NPC	4/20/2017

Disability	Denied Full and Equal Enjoyment	3/25/2016	6/17/2016	Administrative Closure	5/18/2017
Disability	Denied Full and Equal Enjoyment	10/22/2015	6/17/2016	NPC	1/19/2017
Disability	Denied Full and Equal Enjoyment	4/25/2016	6/28/2016	Conciliation	9/20/2018
Disability	Denied Full and Equal Enjoyment	5/31/2016	6/28/2016	NPC	9/22/2017
Disability	Denied Full and Equal Enjoyment	6/2/2016	6/28/2016	NPC	3/16/2017

Disability	Denied Full and Equal Enjoyment	5/6/2016	6/28/2016	NPC	2/16/2017
Retaliation	Denied Full and Equal Enjoyment	5/25/2016	6/28/2016	NPC	2/16/2017
Sex	Denied Full and Equal Enjoyment	5/22/2016	6/28/2016	NPC	Jun-17
Sex	Denied Full and Equal Enjoyment	5/11/2016	7/11/2016	NPC	2/16/2017
Familial Status	Denied Full and Equal Enjoyment	4/24/2016	7/11/2016		

Sex	Denied Full and Equal Enjoyment	3/5/2016	7/11/2016		
National Origin	Denied Full and Equal Enjoyment	6/20/2016	7/19/2016	Conciliation	9/22/2017
Race	Denied Full and Equal Enjoyment	6/7/2016	7/19/2016	Withdrawal w/Settlement	11/17/2016
Disability	Denied Full and Equal Enjoyment	7/19/2016	7/25/2016	NPC	9/22/2017
Disability	Denied Full and Equal Enjoyment	7/21/2016	7/25/2016	NPC	4/20/2017

Race	Denied Full and Equal Enjoyment and Evicted	6/23/2016	7/25/2016	NPC	3/16/2017
Disability	Denied Full and Equal Enjoyment	6/28/2016	7/25/2016	Withdrawal with Settlement	2/21/2019
National Origin, Sex and Familial Status	Denied Full and Equal Enjoyment	5/9/2016	7/25/2016	Withdrawal with Settlement	8/16/2018
Disability	Denied Full and Equal Enjoyment	7/1/2016	8/6/2016	NPC	6/17/2017
Race	Denied Full and Equal Enjoyment	6/9/2016	8/6/2016	NPC	1/19/2017

Disability & Familial Status	Denied Full and Equal Enjoyment	1/29/2016	8/6/2016		
Race	Denied Full and Equal Enjoyment	7/6/2016	8/12/2016	Administrative Closure	4/20/2017
Disability	Denied Full and Equal Enjoyment	8/11/2016	10/3/2016	Post Cause Conciliation	11/15/2018
Disability	Denied Full and Equal Enjoyment	6/16/2016	10/3/2016	Withdrawal w/o Settlement	6/15/2017
Race	Denied Full and Equal Enjoyment	7/29/2016	10/7/2016	NPC	6/17/2017

Disability	Denied Reasonable Accommodation	7/26/2016	10/7/2016	Withdrawal w/ Settlement	7/10/2017
Disability	Eviction	8/18/2016	10/11/2016	NPC	9/22/2017
Race	Denied Housing	8/2/2016	10/17/2016	NPC	9/22/2017
Race	Denied Full and Equal Enjoyment	6/30/2016	10/17/2016	Withdrawal w/o Settlement	6/15/2017
Disability	Denied Full Enjoyment and Eviction	6/30/2016	10/19/2016	NPC	5/18/2017

National Origin	Denied Full Enjoyment and Eviction	8/10/2016	10/19/2016	NPC	3/16/2017
Race	Eviction	3/15/2016	10/19/2016	NPC	9/22/2017
Race	Denied Full and Equal Enjoyment	1/1/2016	10/19/2016		
Disability	Denied Opportunity to View and Rent	6/29/2016	10/28/2016	NPC	3/16/2017
Disability	Denied Reasonable Accommodation	8/1/2016	10/28/2016	Withdrawal with Settlement	9/22/2017

Disability	Denied Reasonable Accommodation	9/29/2016	11/4/2016	Dismissal w/o Pred.	8/16/2018
Race and Disability	Denied Full Enjoyment and Eviction	12/6/2015	11/4/2016	NPC	6/17/2016
Disability	Denied Full Access	6/8/2016	11/15/2016	Dismissal without Pred.	5/16/2019
Retaliation	Denied Full Enjoyment	9/22/2016	11/15/2016	Withdrawal w/Settlement	2/16/2017
Disability	Denied Full Enjoyment	9/19/2016	11/21/2016	Conciliation	9/22/2017

Race and Disability	Denied Full Enjoyment	9/13/2016	11/21/2016	NPC	9/22/2017
Religion and Disability	Denied Full Enjoyment	4/29/2016	11/21/2016	Withdrawal w/Settlement	11/16/2017
Race	Threaten to Evict	9/9/2016	11/23/2016	Withdrawal w/Settlement	3/16/2017
Disability	Denied Reasonable Accommodation	10/15/2016	12/5/2016	Dismissed w/o Prejudice	4/25/2018
Disability	Denied Reasonable Accommodation	9/26/2016	12/8/2016	Dismissal w/o Pred.	8/16/2018

Disability	Denied Reasonable Accommodation	9/25/2016	12/9/2016	Conciliation	9/22/2017
Sex	Harassment	11/7/2016	12/14/2016		
Race	Denied Full Enjoyment and Eviction	1/1/2016	12/15/2016		
Disability	Denied Reasonable Accommodation/Emt Animal is overweight-exchange dog	12/1/2016	12/19/2016		
Disability	Denied the Full Enjoyment/Refuses to rent to individual w/Emotional Support Animals	6/1/2016	12/20/2016	NPC	8/16/2018

Disability	Denied Full Enjoyment	12/7/2016	12/20/2016		
Race	Denied Full and Equal Enjoyment	6/28/2016	12/22/2016	NPC	11/16/2017
Disability	Denied Full Enjoyment and Eviction	11/15/2016	1/6/2017	Conciliation	3/16/2017
Sex	Discrimination by Gender	10/20/2016	1/6/2017	Conciliation	5/20/2017
Disability	Denied Reasonable Accommodation and Denied Full Enjoyment	12/16/2016	1/6/2017	NPC	1/18/2018

Familial Status in Housing	Denied Full Enjoyment Based on Familial Status	9/6/2016	1/6/2017	Withdrawal with Settlement	9/22/2017
Disability	Denied a Reasonable Accommodation for a Service Dog	10/20/2016	1/13/2017	Dismissal w/o Pred.	8/16/2018
Religion	Denied Full Enjoyment Based on Religion	12/2/2016	1/25/2017	Conciliation	1/18/2018
National Origin	Discriminated against by National Origin	12/8/2016	1/25/2017	NPC	1/17/2019
Disability	Denied Reasonable Accommodation Request for Service Dog/Required Training Certificate	10/17/2016	1/26/2017		

Disability	Denied Reasonable Accommodation by Refusing to Waive Pet Rule Prohibiting Service Animal from Accessing Common Areas of Dwelling	8/29/2016	2/2/2017	Conciliation	3/16/2017
Disability	Denied Reasonable Accommodation Refusing to Waive Pet Rule Which Prohibits Service Dogs Based Upon Breed	9/1/2016	2/2/2017	Conciliation	11/16/17
Disability	Denied Reasonable Accommodation by Requiring Tester to Provide the Respondent Permission to Contact and Interact with Medical Professional	9/1/2016	2/2/2017	Conciliation	1/18/2018
Disability	Denied the Full Enjoyment Because of Disability, Perceived Disability, or Record of Disability	11/28/2016	2/3/2017	NPC	5/18/2017

Disability	Denied a Reasonable Accommodation for a Service Dog Based on Breed	9/1/2016	2/6/2017	Conciliation	11/16/2017
Disability	Denied Full Enjoyment Based Upon Disability	8/15/2016	2/6/2017	NPC	8/16/2018
Race	Denied Full Enjoyment Based Upon Race	12/19/2016	2/6/2017	NPC	8/16/2018
National Origin	Denied Full Enjoyment Based Upon National Origin	8/26/2016	2/6/2017		
Disability	Denying Full Enjoyment Based Upon Accommodation for Cat -Support Animal for Mental Disability	12/27/2017	2/15/2017	Withdrawal with Settlement	2/8/2018

Sex	Discrimination Based on Gender. A Disparate Impact Against Women	1/10/2017	2/22/2017	Dismissal w/o Pred.	4/25/2018
Disability	Disability Discrimination	2/14/2017	2/27/2017	Conciliated	6/15/2017
Disability	Disability Discrimination	1/4/2017	2/28/2017	Conciliated	6/15/2017
Race or Color	Denied Full Enjoyment of Home Based on Race	6/22/2016	2/28/2017	NPC	1/19/2019
Race or Color	Denied Full Enjoyment of Home Based on Race	1/28/2017	3/3/2017	NPC	6/15/2017

Disability	Discrimination Based on Refusal to Grant Reasonable Accommodation	3/2/2017	3/16/2017	Conciliation	11/16/2017
National Origin	Denied Full Enjoyment of Home Based on Race	11/21/2016	3/16/2017	NPC	1/17/2019
Disability	Denied Full Enjoyment of Home	4/20/2016	3/17/2017	Post Cause Conciliation	11/15/2018
Disability	Denied Reasonable Accommodation that Allowed an Emotional Support Animal to Remain	2/28/2017	4/25/2017		
Disability	Disability Discrimination	4/17/2017	5/8/2017	Conciliation	8/15/2019

Disability	Denied Reasonable Accommodation that Allowed an Emotional Support Animal	3/13/2017	5/9/2017	Conciliation	9/22/2017
Disability	Denied Reasonable Accommodation that Allowed an Emotional Support Animal	3/14/2017	5/9/2017	Conciliation	9/22/2017
Disability	Denied Reasonable Accommodation that Allowed an Emotional Support Animal	3/17/2017	5/9/2017	Conciliation	9/22/2017
Disability	Denied Reasonable Accommodation that Allowed an Emotional Support Animal	3/7/2017	5/9/2017	NPC	9/22/2017
National Origin	Denied Full Enjoyment Based on National Origin	2/22/2017	5/11/2017	NPC	3/15/2018

Disability	Denied a Reasonable Accommodation	4/4/2017	6/5/2017	Withdrawal with Settlement	8/16/2018
Disability	Denied Reasonable Accommodation that Allowed an Emotional Support Animal	3/17/2017	6/20/2017	Conciliation	9/22/2017
Disability	Denied Reasonable Accommodation that Allowed an Emotional Support Animal	3/10/2017	6/21/2017	Conciliation	9/22/2017
Disability	Denied Reasonable Accommodation that Allowed an Emotional Support Animal	3/3/2017	6/21/2017	NPC	9/22/2017
Familial Status in Housing	Denied Full Enjoyment Based on Familial Status	5/26/2017	7/5/2017	Withdrawal w/o Prejudice	11/16/2017

Familial Status in Housing	Denied Full Enjoyment Based on Familial Status	5/24/2017	7/7/2017	Conciliation	11/16/2017
Sex	Denied Full Enjoyment and Eviction Based on Refusal of Sexual Advancements	6/10/2017	7/10/2017	NPC	11/16/2017
Familial Status in Housing	Denied Full Enjoyment of Home Based on Familial Status	4/10/2017	7/20/2017	NPC	1/18/2018
Disability	Denied Full Enjoyment Based on Disability	10/27/2016	8/3/2017		
Disability	Denied Reasonable Accommodation that Allowed an Emotional Support Animal	8/9/2017	9/6/2017	NPC	8/16/2018

Disability	Denied Reasonable Accommodation	8/3/2017	10/13/2017	Withdrawal with Settlement	3/15/2018
Disability	Denied Reasonable Accommodation	7/19/2017	10/17/2017	NPC	3/15/2018
Disability	Denied Reasonable Accommodation	3/20/2017	10/17/2017	Withdrawal without Settlement	1/18/2018
Disability	Denied Reasonable Accommodation	3/15/2017	10/18/2017	NPC	1/18/2018
Disability	Denied Reasonable Accommodation	3/10/2017	10/18/2017	Withdrawal without Settlement	11/16/2017

Disability	Denied Reasonable Accommodation	3/7/2017	10/18/2017	Withdrawal without Settlement	1/18/2018
Disability	Denied Reasonable Accommodation	3/23/2017	10/19/2017	Withdrawal without Settlement	1/18/2018
Disability	Denied Accommodations	3/14/2017	10/19/2017	Withdrawal without Settlement	1/18/2018
Disability	Denied Accommodations	3/14/2017	10/19/2017	Withdrawal without Settlement	1/18/2018
Disability	Denied Accommodations	10/23/2017	11/1/2017	NPC	2/8/2018

Sex	Denied Accommodations	10/11/2017	11/3/2017	Conciliated	3/15/2018
Disability	Denied Full Enjoyment of Home	4/5/2017	11/21/2017	NPC	3/15/2018
Disability	Denied Full Enjoyment of Home	4/4/2017	11/29/2017	Conciliation	8/16/2018
Disability	Denied Full Enjoyment of Home	9/28/2017	11/29/2017	NPC	3/15/2018
Disability	Denied Accommodation	10/6/2017	11/30/2017	Conciliation	8/16/2018

Disability	Denied Accommodation	10/6/2017	11/30/2017	NPC, Dismissal	4/25/2018
Disability	Denied Accommodation	11/3/2017	12/18/2017	NPC, Dismissal	4/25/2018
Race	Denied Full Enjoyment of Home	10/20/2017	12/20/2017	NPC, Dismissal	4/25/2018
Disability	Denied Accommodation	9/28/2017	1/18/2018	Post Cause Conciliation	11/15/2018
Familial Status in Housing	Denied Full Enjoyment of Home	11/4/2017	1/22/2018		

Disability	Denied Full Enjoyment of Home	10/31/2017	1/25/2018	NPC, Dismissal	4/25/2018
Disability	Denied Full Enjoyment of Home	8/11/2017	1/26/2018		
Disability	Denied Full Enjoyment of Home	8/11/2017	1/30/2018		
Race	Denied Full Enjoyment of Home	1/3/2018	2/16/2018	NPC	3/15/2018
Disability	Refused to Accommodate	1/2/2018	3/16/2018	NPC	1/17/2019

Disability, Familial Status	Denied the full and equal enjoyment, denied a reasonable accommodation	12/22/2017	3/29/2018	NPC	8/16/2018
Race	Denied the full enjoyment	9/1/2017	3/29/2018	NPC	8/16/2018
Race, Sex	Denied the full enjoyment	7/24/2017	3/30/2018	NPC	8/16/2018
Race	Denied the full enjoyment	12/8/2017	4/16/2018	NPC	8/16/2018
Disability	Denied full enjoyment, denied a reasonable accommodation	2/5/2018	5/16/2018	NPC	8/16/2018

Disability	Denied full enjoyment, denied reasonable accommodation	4/26/2018	5/16/2018	Withdrawal with Settlement	8/16/2018
Disability	Eviction	5/1/2018	5/16/2018		
Race or Color	Denied full enjoyment, denied access	2/8/2018	5/16/2018		
Disability	Denied full enjoyment, denied reasonable accommodation	4/3/2018	5/24/2018	Conciliation	11/15/2018
Disability	Denied Full Enjoyment of Home Based on Race	4/20/2018	5/24/2018	NPC	9/20/2018

Disability, Sex	Denied reasonable accommodation, Denied full enjoyment	5/18/2018	6/5/2018	NPC	9/20/2018
Disability	Denied Full Enjoyment	3/23/2018	6/6/2018	NPC	9/20/2018
Race, Retaliation	Denied Full Benefit/Enjoyment of Home Based on Race, Harassment, Intimidation, Threat of Violence	5/2/2018 Ongoing/Continuing	6/7/2018	Conciliated	3/22/2019
Race	Denied Full Enjoyment of Home Based on Race, Harassment, Retaliation	12/7/2017	6/11/2018	NPC	11/15/2018
Disability	Denied Reasonable Accommodation Based Upon Support Animal for Mental Disability, Eviction (Notice to Vacate), Denied Full	5/2/2018	6/13/2018	Dismissal without Pred.	9/20/2018

	Benefit of Home				
Race	Denied Full Enjoyment, Differential Treatment	4/16/2018	7/30/2018	NPC	11/15/2018
Disability	Denied Full Enjoyment, Denied Accessibility	8/15/2017	7/30/2018		
Disability	Denied Full Enjoyment, Differential Treatment	6/6/2018	7/30/2018		
Sex	Subjected to Sexual Harassment based on gender.	4/2/2018	8/2/2018	Withdrawal with Settlement	2/21/2019

Disability	Denied Reasonable Accommodation, Eviction	3/23/2018	8/6/2018	Conciliated	3/22/2019
Race	Differential Treatment, Subjected to Harassment	5/7/2018	8/6/2018	Withdrawal w/o Settlement	11/15/2018
Sex	Discriminated against and harassed based on sex	5/12/2018	8/24/2018	NPC	11/15/2018
Familial Status	Denied Full Enjoyment of Home Based on Familial Status	6/1/2018	8/30/2018	Conciliation	1/17/2019
Sex	Differential Treatment	4/10/2018	9/14/2018	NPC	2/21/2019

Disability	Differential Treatment, Denied Services	7/25/2018 continuing	10/1/2018	NPC	4/18/2019
Race	Discriminated against, Denied opportunity to secure a housing loan based on race	10/1/2017	10/1/2018	NPC	3/22/2019
Race, Color, Sex	Differential Treatment, Denied Full Enjoyment of Home, Discriminated Against	6/8/2018	10/1/2018	NPC	2/21/2019
Disability	Denied Reasonable Accommodation, Differential Treatment, Discriminated against	7/25/2018	10/1/2018		
Sex	Differential Treatment, Threatened with Eviction	8/10/2018	10/3/2018	NPC	11/15/2019

Race or Color	Discriminated Against, Denied the Renewal of Lease	4/18/2018 continuing	10/4/2018	NPC	3/22/2019
Race or Color, Familial Status	Denied Housing, Differential Treatment	4/4/2018	10/10/2018	NPC	1/17/2019
Race or Color	Differential Treatment, Subjected to Harassment	8/16/2018	10/16/2018	NPC	2/21/2019
Disability	Denied Reasonable Modification	8/1/2018	10/23/2018	Withdrawal with Settlement	3/22/2019
Disability	Subjected to Harassment and Sexual Harassment.	5/4/2018	10/25/2018	NPC	3/22/2019

Disability	Failure to provide reasonable accommodation	8/7/2018 Continuing	11/2/2018		
Race or Color	Denied Housing	6/9/2018	11/14/2018	NPC	2/21/2019
Disability	Failure to provide reasonable accommodation	5/1/2018	11/29/2018	Post Cause Conciliation	9/25/2019
Familial Status	Differential Treatment, Subjected to Discriminatory Advertising	8/1/2018	11/30/2018	Conciliation	6/20/2019
Sex, Retaliation	Subjected to Sexual Harassment	4/23/2018; Continuing	12/12/2018		

National Origin	Differential Treatment	11/12/2018	12/13/2018		
National Origin	Differential Treatment, Denied Housing	2/26/2018	12/14/2018	NPC	3/22/2019
Disability	Retaliated Against	11/29/2018	1/14/2019	NPC	4/18/2019
Disability, Retaliation	Subjected to Harassment, Retaliated Against	10/19/2018	1/14/2019	NPC	4/18/2019
Disability	Differential Treatment, Denied Reasonable Accommodation	9/16/2018	1/25/2019	NPC	3/22/2019

Disability	Termination of Lease	1/2/2019	1/29/2019	NPC	8/15/2019
Race or Color, Disability	Differential Treatment, Denied Reasonable Accommodation	1/7/19 and continuing	2/4/2019	NPC	5/16/2019
Race or Color, Sex	Differential Treatment, Denied Services	7/1/2018 and continuing	2/4/2019	NPC	5/16/2019
Disability	Denied Reasonable Accommodation, Retaliated Against	5/2/2018	2/22/2019		
Race or Color, Familial Status	Differential Treatment, Subjected to Harassment	12/4/2018	2/25/2019		

Race or Color	Differential Treatment	2/8/2019 and continuing	3/22/2019	NPC	11/15/2019
Disability	Denied Full Enjoyment of Home, Denied Reasonable Accommodation	1/25/2019	4/5/2019	NPC	6/20/2019
Disability	Denied Reasonable Accommodation	3/7/2019 and continuing	4/22/2019		
Race or Color, Disability	Differential Treatment	1/8/2019	4/22/2019		
Race or Color, Disability	Denied Full Enjoyment of Home	4/1/2019 and continuing	4/24/2019	NPC	8/15/2019

Race or Color	Differential Treatment	7/2/2018 and continuing	5/3/2019	Withdrawal w/ Settlement	6/20/2019
Familial Status	Denied Housing Opportunity	3/4/2019 and continuing	5/3/2019		
Disability	Denied Housing Opportunity, Denied Reasonable Accommodation	12/31/2018	5/14/2019	NPC	8/15/2019
Disability	Denied Reasonable Accommodation, Differential Treatment, Denied Housing, Subjected to Harassment	11/20/2018	5/30/2019		
Disability, Retaliation	Subjected to Harassment, Retaliated Against	5/2/2019	6/26/2019	NPC	8/15/2019

Sex	Eviction	5/4/2019	6/26/2019		
Disability	Denied Reasonable Accommodation, Eviction Pending	7/25/2019	8/7/2019		
Disability	Denied reasonable accommodation, Denied full enjoyment	3/7/2019	8/15/2019		
Race	Denied Full Enjoyment of Home, Denied Services	9/20/2018	9/17/2019		
Race	Differential Treatment, Denied Full Enjoyment of Home	5/28/2019	10/7/2019		

Familial Status	Differential Treatment, Subjected to Harassment, Denied Housing Opportunity	7/3/2019	10/11/2019		
Race	Differential Treatment, Denied Full Enjoyment of Home	7/8/2019	10/11/2019		
Race	Denied Housing Opportunity	04/08/2019 and continuing	10/11/2019		
Race, Familial Status	Differential Treatment, Denied Full Enjoyment of Home	4/25/2019	10/11/2019		
Disability	Subjected to Different Terms and Conditions	9/26/2018	10/14/2019		

Sex	Subjected to Different Terms and Conditions, Denied Housing Opportunity	6/9/2019	10/16/2019		
Disability	Subjected to Different Terms and Conditions	09/27/2019 and continuing	11/6/2019		
Race	Subjected to Different Terms and Conditions, Denied Housing Opportunity	7/1/2019 and continuing	11/6/2019		
Disability	Differential Treatment, Denied Full Enjoyment of Home	3/1/2019	12/13/2019		
Disability	Denied Reasonable Accommodations, Subjected to Different Terms and Conditions, Denied Housing Opportunity	8/30/2019	12/13/2019		

Race	Differential Treatment, Denied Full Enjoyment of Home	7/31/2019	12/13/2019		
Disability	Denied Reasonable Accommodation, Differential Treatment, Denied Housing	8/17/2019	12/19/2019		
Familial Status	Differential Treatment, Denied Full Enjoyment of Home	7/10/2019	12/19/2019		
Race	Subjected to Different Terms and Conditions, Denied Housing Opportunity	06/21/2019 and continuing	1/2/2020		
Disability	Denied Reasonable Accommodation	9/21/2019	1/3/2020		

Disability	Differential Treatment	10/1/2019	1/3/2020		
Retaliation, Familial Status, Disability	Subjected to Different Terms and Conditions, Denied Housing Opportunity, Failure to meet <u>DESIGN AND CONSTRUCTION REQUIREMENTS</u>	12/17/2019 and continuing	1/13/2020		
Sex	Subjected to Different Terms and Conditions	09/30/2019 and continuing	1/13/2020		
Disability	Denied Full and Equal Enjoyment	4/20/2016	5/4/2016	Conciliated	4/20/2017

Sex	Denied Full Benefit/Enjoyment of Home Based on Sex, Subjected to Harassment, Intimidation	6/6/2018 Ongoing/Continuing	7/27/2018 mailed 8/2/2018	NPC	3/22/2019
Familial Status	Denied Housing Due to Family Size	5/30/2017	9/27/17	Dismissal w/o Pred.	8/16/2018
Disability	Denied Full and Equal Enjoyment	9/9/2015	9/29/2015	NPC	4/21/2016

Fair Housing Council (FHC)

In 2015-2019 there were 77 calls to the FHC alleging incidents of housing discrimination in Louisville Metro. Of those, 15 were sent to the Louisville HRC, the Kentucky Human Rights Commission, or HUD for more action after initial investigation for credible allegation.

The FHC reported that rental housing was the subject of the overwhelming number of complaints, but there were other issues, such as: lending, sales, issues with a condominium association, issues with a homeowners association, harassment by neighbors and zoning issues. The issues in rental usually fell into the area of term and conditions of renting.

The FHC found some commonalities between the type of complaint and the protected class. There were 55 cases involving people claiming they were discriminated against due to their disability and the typical call was about what qualifies as reasonable modification/accommodation (with a high number of those cases involving support animals). There were 3 cases involving people claiming that they were discriminated against due to their familial status and the typical call was about a failure to rent to the family. There were 7 cases involving people claiming that they were discriminated against due to their gender and the typical call was about sexual harassment. There were 8 cases involving people who claimed they were discriminated against due to their race, and 4 cases involving people who claimed that they were discriminated against due to their national origin.