



**Analysis of Impediments to Fair Housing
2015-2019**



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Introduction

In order to participate in the Community Development Block Grant (CDBG) program, the U.S. Department of Housing and Urban Development (HUD) requires that the City of Manhattan (the City) commit to *Affirmatively Further Fair Housing Choice*. All jurisdictions receiving CDBG funds must prepare an Analysis of Impediments to Fair housing choice, develop strategies and activities to overcome the effects of identified impediments and maintain records that reflect the analysis and actions. Fair housing choice activities in Manhattan will be funded with the City's CDBG allocation.

Impediments to fair housing are defined as any actions, omissions, or decisions taken because of race, religion, sex, disability, familial status or national origin that have any effect of restricting housing choice or the availability of housing choice.

This Analysis of Impediments reviews the City's laws, regulations, administrative procedures and practices, to assess how these may affect the location, availability and accessibility of housing. It also examines forces, public and private, which may affect fair housing choice for all protected classes within the City.

Methodology and Participants

The City's Community Development Department staff conducted the Analysis of Impediments during the development of the 2015-2019 Consolidated Plan. Information was gathered from numerous departments, agencies and data sources as shown below, and reviewed for relevance to this analysis.

- U.S. Census Bureau
- U.S. Department of Housing and Urban Development
- City of Manhattan: Human Resources and Code Services Departments
- City of Manhattan: Community Development Zoning Ordinance
- Riley County: Economic Development Office and Appraiser's Office
- Manhattan Housing Authority
- Manhattan Area Housing Partnership, Inc.
- Labor Market Information Services, Kansas Department of Labor
- Kansas Human Rights Commission, *Annual Reports 2009 Et Seq.*
- Kansas State University (KSU) Registrar's Office & Office of Dining & Housing
- Fort Riley Plans, Analysis & Integration Office, *Economic Impact Study 2013*

While this analysis specifically addresses Fair Housing in Manhattan only, the City is also collaborating with the Flint Hills Regional Council (FHRC) on a Fair Housing and Equity Assessment (FHEA)/Regional Analysis of Impediments (RAI). That housing study will include the counties of Geary, Lyon, Morris, Pottawatomie, Riley, and Wabaunsee, and is made possible through a grant from the Office of Sustainable Housing & Communities of the U.S. Department of Housing & Urban Development.

City of Manhattan Background Data

Geography

Manhattan is located in Northeastern Kansas approximately 120 miles west of Kansas City, with an area of approximately 19 square miles. The majority of the Manhattan city limits lie in southeastern Riley County, with a small portion of the City in southwestern Pottawatomie County. Within the city limits, all of Manhattan's residential areas are in Riley County.

Population

According to the 2009-2013 American Community Survey estimate, Manhattan's population was 54,082 persons, a 31% increase in population since 2000. The composition of residents in Manhattan is very unique given the presence of Kansas State University and the Fort Riley Military Post. The ACS estimates shows 16.5% of Manhattan's population were members of minority groups, 5.8 % were Hispanic or Latino and 8% were foreign born. People identifying as Hispanic/Latino for all races represented a 2% increase in population, people identifying as Asian increased 1.7% and people who identified as two or more races increased 1.6%, while the percentage of people who identified as white dropped 3%. Only 5.7% of the population identified as veterans.

2013 Estimated Population by Minority Status	Manhattan		KSU Fall 2014	
	Number	Percent	Students	Percent
All Persons	<u>54,082</u>	<u>100.00%</u>	<u>21569</u>	<u>100.00%</u>
White	45,790	84.70%	16,147	74.86%
Black or African American	3,145	5.80%	759	3.52%
American Indian and Alaska Native	216	0.40%	71	0.33%
Asian	2,860	5.30%	304	1.41%
Native Hawaiian and Other Pacific Islander	9	0.00%	23	0.11%
Two or More Races	1,753	3.20%	606	2.81%
All Other Races/Unspecified	955	.60%	321	1.49%
International Students with Visas at KSU			2,125	9.85%
Hispanic (all races)	1,963	5.80%	1,213	5.62%

Source: U.S. Census Bureau and KSU Registrar's Office

Manhattan has a diverse community of foreign born persons representing 8% of the total population, and nearly 10% of the Kansas State University population. Of all foreign born persons in Manhattan in 2013, 59% were from Asian nations, 19% were from Latin American nations, 15% were from European nations, and 5% were from an African nation. The remaining 2% were from various other nations.

Language

Among people at least 5 years of age living Manhattan, 9 percent spoke a language other than English at home. Asian and Pacific Islander languages represented 38.7%, Spanish languages represented 32.7% and 20.5% spoke an Indo-European language. Approximately 8% spoke some other language.

Age

As of the 2009-2013 ACS more than half of Manhattan's population (52.3%) was 24 years of age and younger, 39.8% were between the ages of 24 and 64, and 7.2% of the population was over age 65. The percentage of population between ages 19 and 65 was 80%.

Disability

Among non-institutionalized people in Manhattan in 2009-2013, 6% reported a having a disability. The reporting varied by age: 28% of people 65 and older, 4% of people age 18 to 64, and 3% of ages 18 and younger reported as disabled.

Education

Manhattan is well educated as 96% of residents over age 18 have at least earned a high school diploma, 52% have a Bachelor's degree and 25% have a Graduate degree. An estimated 4% did not graduate high school.

Households

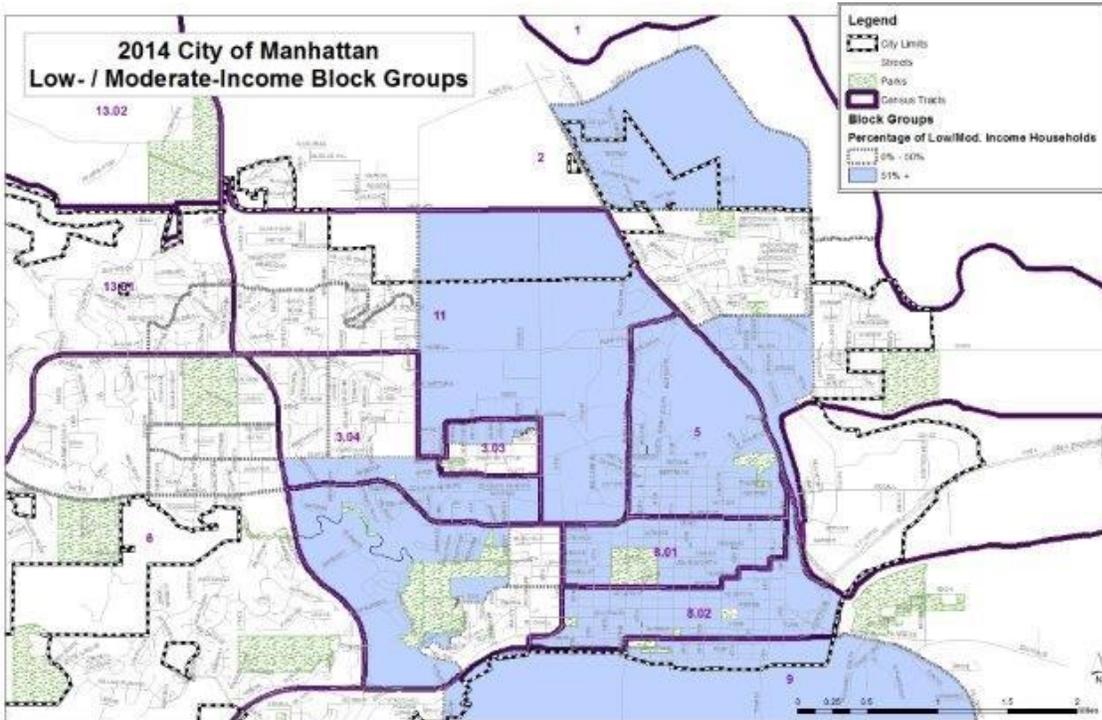
Manhattan is primarily composed of small household arrangements. Nearly 70% of all households consist of 1 to 2 occupants. Families of all types make up 47% of households, and householders living alone represent 32.1% of all households and 21% of households are other non-family arrangements.

Income

The 2013 ACS data indicates that the Manhattan, Kansas MSA Median Family Income (MFI) was \$42,483. In 2013, 27% of all Manhattan residents had income below the poverty threshold for the previous 12 months.

Approximately 41% of households earned less than the 80% of the Riley County Median Family Income and are therefore classified as Low and Moderate Income (LMI) households. While still significant, it reflects a decrease from 2007-2009 measure of 48% earning less than 80% of the Median Income. Male Median Income was 20% higher than Female Median Income. Female head of households

with related children under the age of 18 represented nearly 29% of the families whose income was below the poverty level.



2010 Census

Employment

The 2013 ACS data indicates that the Manhattan, Kansas MSA had 46,617 people who were age 15 and over. Approximately 66% of these people were in the labor force and 34% were not in the labor force with 16% identifying as retired. Of the entire employed labor force, 61% were private salary and wage workers, 35% were federal, state, or local government workers and 4% were self-employed. The City's largest employers are Kansas State University, Fort Riley, USD383, GTM Sportswear and Mercy Regional Health Center (Via Christi).

Fort Riley is a United States Army installation 15 miles west of Manhattan with a total population of approximately 50,453 including off post dependents, employees, and retirees. The current military strength of approximately 17,500 soldiers is expected to shrink to approximately 16,000 due to restructuring of units Army wide. However, with the end of overseas deployments, the Army expects longer local deployments and a stable number of families accompanying their soldiers.

Fort Riley employs 6,522 civilians who consist of Department of the Army (DA) civilians, Federal and Non-Federal civilian employees, and contractors. Civilian employment at the Fort is also expected to see reductions as soldiers returning from deployment overseas resume functions currently held by civilian contractors and as construction of the New Fort Riley Hospital is completed in 2015.

Top Six Employers	Goods or Service	No. of Employees
Fort Riley Military Base	Military Training	17,500
Kansas State University	Higher Education	6,028
Fort Riley Civilian Personnel	Civil Service	6,522
USD #383	Public Schools	1,350
GTM Sportswear	Retail & Manufacturing	900
Mercy Regional Health Center	Hospital	795

Source: Riley County Economic Development and Fort Riley Plans, Analysis and Integration Office, EIS 2014

In 2012, it was determined that the National Bio- and Agro-defense Facility (NBAF) would be located in Manhattan. NBAF will be a state-of-the-art bio-containment facility for the study of foreign animal, emerging and zoonotic (transmitted from animals to humans) diseases that threaten the U.S. animal agriculture and public health. In 2015, construction began on the main laboratory facility, with commissioning expected sometime in 2021. While under construction, the facility is expected to support 750 jobs in the Manhattan economy and approximately 300 permanent full time federally funded positions at completion in 2021.

Housing Profile

According to the 2009-2013 ACS, Manhattan had 22,198 housing units, of which 20,338 were occupied. Housing type consisted of 49% single family structures, 47% multi-unit structures and 4% mobile homes. Approximately 56% of housing was built before 1979. Forty-seven percent (47%) of all multi-unit structures have 3 or more bedrooms. Sixty one percent (61%) of housing units were tenant-occupied and 39% owner-occupied. In 91% of all housing units, there was 1 occupant per room. The vacancy rate was 1.5% for all single family units and 6.9% for rentals.

Nationally, Manhattan ranks in the 98 percentile of renters to owners. The high percentage of rental housing in Manhattan can be attributed to the impact of Kansas State University and Fort Riley.

The U.S. Department of Housing and Urban Development (HUD) helps low-income households rent affordable units through a subsidy program called Section 8. The Section 8 program relies on a combination of data from private rental market rates and local housing market conditions to determine an affordable rate, called the Fair Market Rate (FMR), for two-bedroom units. Nationally, two-bedroom units account for 43 percent of the rental stock. Being the most common unit, they are the easiest units for which to obtain data. HUD estimates FMRs for efficiencies, one-bedroom units, three-bedroom units, and units of other sizes using the two-bedroom estimate as a base which makes the FMR a good barometer of local rental market trends.

Historically in Manhattan, Fair Market Rents (FMR's) have increased an average of 3.19% year over year. The first year in the sample was 1985 when the two-bedroom FMR (for Riley County) was \$275. The FMR for the same 2 bedroom apartment had increased to \$830 by 2013. For comparison, the Median Household Rent (market rate) for a two bedroom in 2013 was \$841. In 2013 the two-bedroom FMR rate in Manhattan saw its largest single year increase going up by 23.33% for a two bedroom apartment.

Listed in the table below are the Fair Market Rents for the Manhattan MSA from 2010, the first year that Manhattan was an Entitlement Community:

FY 2015 Fair Market Rents By Unit Bedrooms					
FMR Year	Efficiency	One-Bedroom	Two-Bedroom	Three-Bedroom	Four-Bedroom
Final FY 2010	\$ 435	\$ 502	\$ 609	\$ 848	\$ 997
Final FY 2011	\$ 442	\$ 509	\$ 618	\$ 860	\$ 1,011
Final FY 2012	\$ 481	\$ 554	\$ 673	\$ 937	\$ 1,101
Final FY 2013	\$ 627	\$ 631	\$ 830	\$ 1,196	\$ 1,470
Final FY 2014	\$ 594	\$ 598	\$ 786	\$ 1,132	\$ 1,392
Final FY 2015	\$ 586	\$ 590	\$ 776	\$ 1,118	\$ 1,374

Source: HUD FY 2015 Fair Market Rent Documentation System

Fort Riley maintains 3,827 family housing units on base for soldiers and their families and 6,317 barracks spaces for single soldiers which totals to slightly more than half of the housing needed for all soldiers. Approximately 1800 soldiers and 800 civilian employees of the base reside in Riley County. As drawdown of foreign deployments continues, the Army expects longer local deployments and a stable number of families accompanying their soldiers. The decreasing civilian and construction employment on the base will be ameliorated by the increase in construction employment in Manhattan as work on the NBAF begins. Pending any Department of Defense (DOD) base realignments, the effect of the base on the Manhattan housing market for the next 5 years should stabilize.

The Manhattan campus of Kansas State University had 21,569 students enrolled in the fall of 2014, but only had housing for approximately 5,450 individuals and foreign students and their families. The balance of the local campus student population and KSU employees live either in Sororities, Fraternities, or in private housing in Manhattan, the surrounding towns and rural county areas. The demand for on-campus housing has been greater than the supply for the last 5 years and the KSU Office of Dining and Housing is planning for a continued growth of the university from .5% to 1% per year, based on the growth in the high school graduation rate in Kansas. They will open a new 540 bed residence hall starting in

spring of 2015 and are planning for another residence hall and additional apartment bedrooms for the future.

Key housing statistics listed below are from Census and 2013 ACS data for tenant and owner occupied housing.

Tenant Occupied

- **17%** of all rental units are affordable to households with incomes between 50% and 80% of HUD MFI.
- **11%** of all rental units are affordable to households with incomes between 30% and 50% of HUD MFI.
- **2%** of all rental units are affordable to households with incomes less than 30% of HUD MFI.
- **55%** of tenants pay 30% or more of their income to rent.
- **2.2 persons** is the average household size of tenant-occupied units.

Owner Occupied

- **7%** of all units for sale are affordable to households with incomes between 50% and 80% of HUD MFI.
- **72%** of all housing units have mortgage.
- **24%** of homeowners **with** a mortgage paid 30% or more to monthly housing costs.
- **13%** of homeowners **without** a mortgage paid 30% or more to monthly housing costs.
- **2.5 persons** was the average household size of owner-occupied units.
- **\$180,000** was the median price for a home in Manhattan, Kansas in 2013.

Housing Problems:

The four categories of Housing Problems defined by HUD are described as lacking a complete kitchen, lacking complete plumbing facilities, more than 1 person per room, or cost burden greater than 30%.

HUD defines a disproportionately greater housing need when a racial or ethnic group experiences housing problems at a rate higher than 10% of the rate for the Adjusted Median Income (AMI) level as a whole. Income classifications are as follows:

- Extremely low income: 0% - 30% of AMI
- Low income: 31% - 50% of AMI
- Moderate income: 51% - 80% of AMI

The table below summarizes the 2007-2011 CHAS data percentage difference of each racial/ethnic group experiencing housing problems by HUD Adjusted Median Income levels.

Summary of Populations With One or More Housing Problems				
Racial/Ethnic Group	0-30% AMI	31-50% AMI	51-80% AMI	81-100% AMI
Jurisdiction as a whole	95.3%	82.4%	48.0%	17.2%
White	94.4%	83.3%	48.9%	17.1%
Black / African American	100.0%	84.2%	50.0%	9.5%
Asian	100.0%	60.0%	35.7%	40.0%
American Indian, Alask Native	0.0%	0.0%	0.0%	0.0%
Pacific Islander	100.0%	0.0%	0.0%	0.0%
Hispanic	100.0%	72.6%	46.2%	0.0%

According to HUD 2011 ACS data, no single race or ethnicity disproportionately experienced the housings problems of sub-standard housing, overcrowding or cost burden. However, data reveals cost burden was the most severe housing problem for all races and ethnicities.

Condition of Rental Housing

The Code Services Division of the Manhattan Fire Department investigates all complaints regarding rental housing condition. Landlords are advised when corrective action must be taken and remediation is pursued for issues that involve health and safety. If issues are not addressed, the City may take enforcement actions as allowed by ordinance and adopted code.

Lead Based Paint

According to the ACS data, 55% of all housing units in Manhattan were built prior to 1979. The City assumes that any structure built prior to 1978 contains lead-based paint, and any housing rehabilitation performed by the City will include a lead based paint risk assessment. Based on the results of the assessment, hazards are identified followed by lead safe practices at qualified sites and control options are reported. Contractors are required to follow lead-safe work practices. Additionally, all general contractors who successfully bid projects are required to be State authorized as lead activity firms, must employ certified lead safe workers, and are monitored by a certified lead based paint inspector. The City of Manhattan will continue to use lead safe work practices in all rehabilitation activities pursuant to 40 CFR 745.80 subpart E.

Ownership Market

The homeowner rate has declined over the last 5 years by 4%; however, the vacancy rate for single family homes has declined slightly to 1.5%, suggesting that

some single family housing stock has been converted to rental units. The local real estate market has fluctuated with regard to the number of annual sales and the changes in prices since 2006. However, the average cost of a home never declined through the housing crisis experienced in most parts of the nation in 2007-2009. The median housing costs for mortgaged owners was \$1,422 in 2013.

Manhattan Ownership Market								
	2007	2008	2009	2010	2011	2012	2013	2014*
Homes Sold	704	628	616	584	587	655	701	671
Avg. Price	\$183,339	\$184,760	\$186,423	\$193,186	\$189,505	\$195,495	\$197,495	\$208,933

Source: Riley County Appraiser's Office, includes single family homes and townhomes sold in valid open market transactions only.

* As of December 1st, 2014

Housing Stock Condition

According to the 2009-2013 ACS, approximately 55% of Manhattan's housing stock was built prior to 1979. Of the entire housing stock, only 0.8% of units were without complete plumbing facilities, and 1.3% of units were without complete kitchen facilities. This is an increase from the previous 5 years (.29% and .14% respectively). This may be due to conversion of older homes into apartment units, where a common area is shared by tenants.

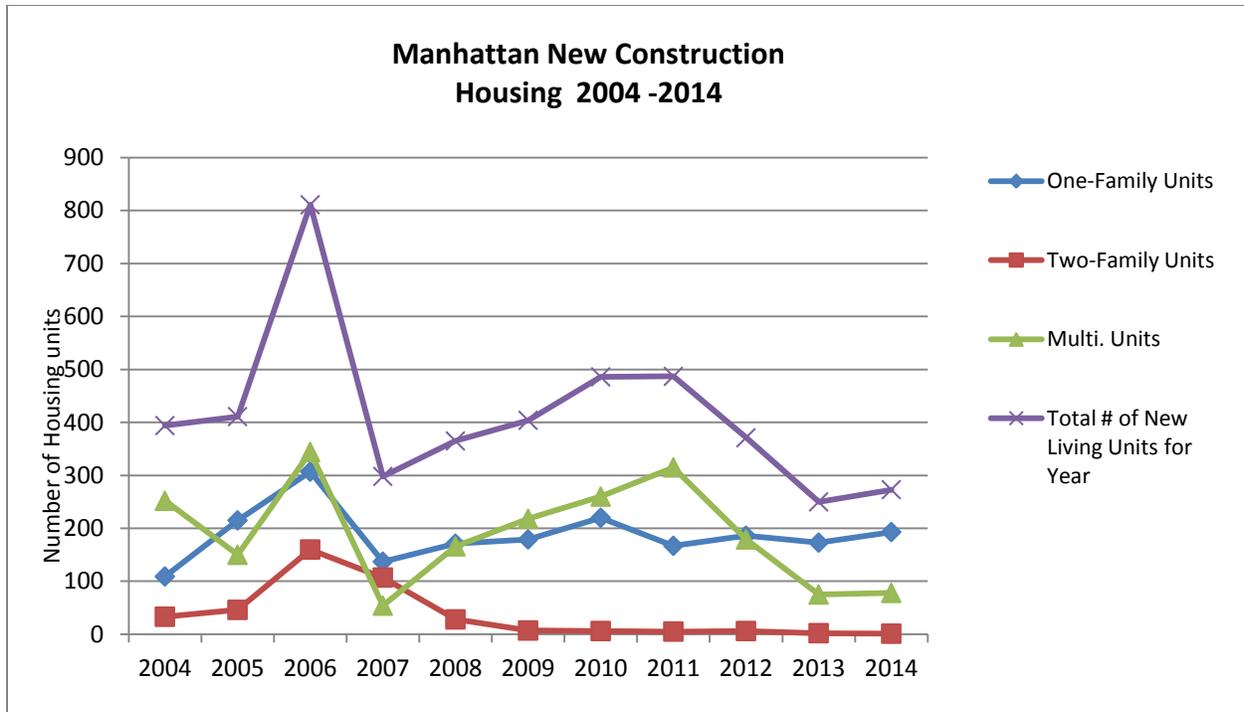
Overcrowding is increasing in the Manhattan community. Only 2.4% of units were identified as overcrowded (greater than 1 person per room) in the 2000 Census while 10.1% were identified as overcrowded in 2009-2013 ACS.

New Construction

The City continues to work with private developers to provide housing choices. The Manhattan Urban Area Comprehensive Plan identifies locations for a variety of housing types throughout the community. As developers propose annexation and zoning applications, they are reviewed on a timely basis by the Planning Board and Manhattan City Commission.

The City also utilizes a Capital Improvements Plan to identify and fund public infrastructure projects that support a wide variety of housing development.

New construction activity in Manhattan had been on an upward trend until the national real estate and economic downturn in 2007 began to affect the area. New construction permits had rebounded until 2011 then experienced a general downturn in activity, related to slow sales of existing homes. New permits (in all housing units) reached its highest mark since the housing crisis at the end of 2010, then the number of new permits issued decreased each year through 2013. In 2014, the trend ticked up and is forecast to increase again slightly in 2015.



Source: Manhattan Code Services Department, Jan 2015

Over the past several years, the City has encouraged the development of new multi-family housing units in various ways, which has resulted in an increased supply of rental housing, and a healthier vacancy rate. Since 2002, eight affordable multi-family tax credit units have been developed by the Manhattan Area Housing Partnership, Inc., a local CHDO, and other private partners. The City has acted positively on Resolutions of support for these projects and in some cases, waived building permit fees and utility hookup fees.

Manhattan Housing Authority

The Manhattan Housing Authority (MHA) is governed by a seven-member policy making Board of Commissioners, appointed by the Mayor, with the consent of the City Commission. Day-to-day operations are managed by an Executive Director and 15 staff members. In 2013, the MHA operated 202 1-4 bedroom units in five public housing communities and managed an additional 106 units in two tax credit housing communities. Since 2011, the MHA has been designated as a "High Performer" in the Section 8 Housing Choice Voucher Program, providing the maximum amount of assistance to the Manhattan Community. The MHA is also responsible for the disbursement of 197 Section 8 Housing Choice Vouchers, 30 Veterans Affairs Supportive Housing Voucher and 25 Family Reunification Vouchers.

The mission of the MHA is to assist income qualified persons with decent, safe and affordable housing in an efficient, ethical and professional manner. Financial

solvency has been a key factor in carrying out this mission. MHA policies will be followed consistently and will affirmatively further HUD’s fair housing goals.

In 2014, the MHA was awarded a Capital Fund Reserve for Emergencies and Natural Disasters (Emergency Funds) grant to renovate the Apartment Towers, the first high rise in Manhattan that is also a public housing unit. The funds from this grant will largely be allocated towards basic interior renovations, and removal of mold and asbestos.

Manhattan Area Housing Partnership, Inc.

The Manhattan Area Housing Partnership (MAHP), Inc. is a Community Housing Development Organization (CHDO) dedicated to bringing quality affordable housing to the Manhattan community as well as dedicated specialized services to low/moderate income persons (LMI) through their Financial Assurance Program.

The Financial Assurance Program assists Social Security and Veteran’s Administration benefit recipients who cannot adequately manage their monthly disability benefit payments, and whose benefits depend on a third party payee. Staff works directly with LMI disabled individuals to help them budget and pay for their housing, food, medical, and other needs required to maintain independence.

MAHP owns and operates low income housing developed with HUD HOME funds and low income housing tax credits received from the Kansas Housing Resources Corporation. The MAHP owns 159 affordable units in seven developments and manages 53 units in five of them. MHA manages the other 106 units in 2 developments for the MAHP. The MAHP also collaborated with the MHA in the first joint venture in Kansas with the development of the Flint Hills Apartments, a public housing and tax credit venture. The MAHP accepts Section 8 vouchers from the MHA and the North Central Flint Hills Area Agency on Aging and Disabilities.

Manhattan Housing Authority Public Housing Family Demographics

White	68.40%
Black or African American	26.71%
Asian	1.95%
American Indian and Alaska Native	0.98%
Native Hawaiian and Other Pacific Islander	0.33%
Two or More Races	1.63%
Hispanic (all races)	7.16%
Female Head of Household	70.03%
Average number of family members	1.92

Tax Credit (Affordable) Housing Family Demographics

White	66.67%
Black or African American	32.26%
Two or More Races	1.08%
Hispanic (all races)	10.75%
Female Head of Household	81.72%
Average Number of family members	2.68

Evaluation of Manhattan's Current Fair Housing Activities

Fair Housing Enforcement

The City created the Manhattan Human Relations Commission in 1964. At a later date the name was changed to the Manhattan Human Rights and Service Board. The local ordinance that created the Board authorizes it to "receive and investigate complaints of discrimination in housing, employment, and public accommodations." The protected classes mirror the federal and state statutes; however, the local ordinance adds military status as a protected class.

Based on data from the Manhattan Human Rights and Service Board, as well as the Kansas Human Rights Commission, there has been one disability discrimination complaint regarding housing filed within the City since 2010. This claim was found to be without merit, as the housing provider proved it was within their policies, the law, and HUD practices.

HUD also investigates housing complaints in Manhattan. From 2010 to 2013, HUD received a total of 11 discrimination complaints of which 5 were based on race, 1 on sex, and 4 on disability.

In 6 of these cases, a "No Cause Determination" was issued by HUD, meaning the investigation revealed no evidence to support the Complainant's allegation(s) of discrimination against the Respondents. In 3 of these cases, the parties agreed to settle the case, signed a Conciliation Agreement, and the Complainant received relief (i.e., monetary, housing, change in policy, etc.). In 2 of the cases, the Complainant worked out a resolution to the complaint with the Respondent and withdrew the complaint.

Identification of Impediments to Fair Housing Choice

Zoning and Subdivision Regulations

There are no known negative effects of City Zoning and Subdivision regulations in regards to affordable housing and residential investment.

The City implements its planning and zoning authority through the Manhattan Urban Area Comprehensive Plan, the Manhattan Urban Area Subdivision Regulations and the Manhattan Zoning Regulations. The Manhattan City Commission adopts and updates the comprehensive plan and other policy documents for the Board's jurisdictional area, and formulation of Subdivision and Zoning Regulations for the City.

The City has recently updated the Comprehensive Plan for the Manhattan Area through 2035. It contains elements which promote neighborhoods that contain a mix of land uses and diversified housing options to serve a growing and changing population, including housing that is affordable and design that allows for multi-

modal connectivity between adjacent neighborhoods, commercial areas, parks and open space. Housing and neighborhood goals include maintaining the quality and character of established neighborhoods throughout the Manhattan Urban Area and ensuring that infill and redevelopment is compatible with existing neighborhoods and is appropriate in size, scale, design, and use. New neighborhoods will be located where residents of all ages, abilities, and financial means will have access to the full range of infrastructure, facilities, and services to lead active, healthy lifestyles.

Providing healthy, livable neighborhoods that offer a variety of lifestyle options is based on the following guiding principles:

- Expanded housing options to meet the needs of a changing community;
- Revitalization of established and core area neighborhoods; and
- Access to amenities that encourage active and healthy lifestyles.

Building Codes

There are no known negative effects of City Building Codes in regards to affordable housing and residential investment.

The City has adopted the 2012 International Building Code Series, and the 2011 National Electrical Code. The City prefers to use the Federal Fair Housing guidelines for accessibility compliance in covered multifamily dwellings, which references the American National Standards Institute (ANSI) requirements for accessibility. The Code Services Division of the Manhattan Fire Department ensures through the permitting and enforcement process that new multifamily housing containing four or more dwelling units complies with all federal regulations of the Fair Housing Act.

Manhattan Housing Authority

The MHA follows the procedure set forth in its Tenant Selection and Waiting List Management Plan, pursuant to the requirements of [24 CFR 960.204.] In filling an actual or expected vacancy, the MHA offers the dwelling unit to an applicant in the appropriate sequence, with the goal of accomplishing de-concentration of poverty and income-mixing objectives. The number and types of families on waiting lists for public housing and section 8 tenant-based rental assistance change with the circumstances of the applicants and the availability of housing.

Private Sector Lending

Beginning in 2010, local lending institutions became subject to federal reporting as required by the Home Mortgage Disclosure Act (HMDA) and the Federal Financial Institution Exam Council (FFIEC) for all Metropolitan Statistical Areas (MSA). Current data from the FFIEC show that there are no underserved census tracts in the City.

2014 FFIEC Census Report - Summary Census Demographic Information

County Code	Tract Code	Tract Income Level	Distressed or Under-served Tract	Tract Median Family Income %	2014 Est. Tract Median Family Income	Tract Pop.	Tract Minority %	Minority Pop.	Owner Occupied Units	1- to 4-Family Units
161	2	Middle	No	89.72	\$59,754	9017	19.69	1775	2250	3211
161	3.03	Moderate	No	77.24	\$51,442	2642	21.35	564	61	312
161	3.04	Middle	No	97.78	\$65,121	5013	15.8	792	562	1113
161	5	Middle	No	105.48	\$70,250	4968	16.12	801	357	1683
161	6	Upper	No	144.43	\$96,190	7779	19.82	1542	1648	1921
161	7	Moderate	No	62.43	\$41,578	4188	17.05	714	1015	1854
161	8.01	Moderate	No	79.22	\$52,761	4253	16.84	716	226	1226
161	8.02	Moderate	No	63.52	\$42,304	2172	25.92	563	273	1037
161	9	Middle	No	106.05	\$70,629	5707	20.87	1191	1129	2118
161	11	Middle	No	106.62	\$71,009	8616	23.08	1989	860	1026
161	13.01	Upper	No	124.64	\$83,010	2984	22.69	677	530	613

The Community Reinvestment Act (CRA) is a United States federal law designed to encourage commercial banks and savings associations to help meet the needs of borrowers in all segments of their communities, including low-and moderate-income neighborhoods. There are 19 financial institutions in the City that originate loans and all have a Community Reinvestment Act (CRA) rating of satisfactory or higher.

The tables below examine dispositions of applications for conventional loans by race, ethnicity, and income.

HOME MORTGAGE DISCLOSURE ACT FOR: MSA/MD: 31740 - MANHATTAN, KS

DISPOSITION OF APPLICATIONS FOR CONVENTIONAL HOME-PURCHASE LOANS, 2013

1- TO 4-FAMILY AND MANUFACTURED HOMES BY RACE, ETHNICITY, AND INCOME OF APPLICANT

RACE:	Applications Received	Loans Originated	App's. Approved But Not Accepted	App's. Denied	App's. Withdrawn	Files Closed For Incompleteness
AMERICAN INDIAN/ALASKA NATIVE	6	4	1	1		
ASIAN	61	55	2	2	2	
BLACK OR AFRICAN AMERICAN	14	8	1	5		
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND	4		1	2	1	
WHITE	898	661	56	117	51	13
2 OR MORE MINORITY RACES						
JOINT (WHITE/MINORITY RACE)	48	42	3	2	1	
RACE NOT AVAILABLE	96	79	9	7	1	

(Cont'd)	Applications Received	Loans Originated	App's. Approved But Not Accepted	App's. Denied	App's. Withdrawn	Files Closed For Incomplete ness
ETHNICITY AND INCOME						
HISPANIC OR LATINO	25	15	4	5	1	
NOT HISPANIC OR LATINO	973	743	54	112	51	13
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	15	11	2	2		
ETHNICITY NOT AVAILABLE	114	80	13	17	4	
MINORITY STATUS						
WHITE NON-HISPANIC	848	636	49	103	47	13
OTHERS, INCLUDING HISPANIC	167	131	12	19	5	
INCOME OF APPLICANTS						
LESS THAN 50% OF MSA/MD MEDIAN	84	44	8	32		
50-79% OF MSA/MD MEDIAN	176	123	19	28	5	1
80-99% OF MSA/MD MEDIAN	135	85	8	29	9	4
100-119% OF MSA/MD MEDIAN	114	88	5	14	6	1
120% OR MORE OF MSA/MD MEDIAN	549	445	30	33	34	7
INCOME NOT AVAILABLE 6/	69	64	3		2	
TOTAL	1127	849	73	136	56	13

Report Date: 06/02/2014

Assessment of Impediments to Fair Housing Choice

Analysis of public sector policy indicates that there appears to be no institutional impediments to fair housing choice. Regulations that are designed to protect the health, safety and welfare of citizens may affect the cost of housing; however, these regulations are not designed to discourage choice or availability of housing. Therefore, the City does not propose actions or reform steps to remove or restructure such policies.

Analysis of both qualitative and quantitative data on housing in Manhattan resulted in the identification of the following impediments to fair housing choice:

Affordability

Data suggests that there may be a disparity between income and the cost of housing in the City. The U.S. Census Bureau shows that 41% of the population is considered Low and Moderate Income by HUD standards, and CHAS information reveals that only an approximate 30% of the available housing stock is affordable to LMI persons.

Accessibility

The economic feasibility of retrofitting older housing stock for accessibility improvements may be an impediment to both landlords and to Low and Moderate Income homeowners. The City performs accessibility rehabilitation for LMI homeowners as one of its CDBG Housing Rehabilitation activities. The Manhattan Housing Authority (MHA) integrates the needs of disabled individuals into their daily operations

Fair Housing Education

There may be a lack of knowledge in the community regarding Fair Housing laws, or where to find such information. Landlords and tenants need to be educated on fair housing rights and responsibilities, particularly the Service Members Relief Act given the influence of Fort Riley on the Manhattan housing market.

Actions to Address Public and Private Fair Housing Choice

To address identified impediments, the City of Manhattan will continue the following activities to affirmatively further Fair Housing Choice:

- Provide Fair Housing brochures, advertisements, radio ads and displays
- Provide Fair Housing public seminars to educate landlords and tenants.
- Continue to work closely with Kansas State University and Fort Riley to promote Fair Housing education and practices.
- Encourage local developers to create and maintain affordable housing.
- Support Fair Housing Month activities.
- Encourage efforts to deconcentrate public housing.
- Continue to administer the Manhattan Housing Rehabilitation Program to maintain existing affordable housing stock, address emergency repairs and to increase the accessibility of housing units available.
- Periodically review zoning and subdivision regulations to determine the effect, if any, on housing affordability and accessibility.
- Encourage and support neighborhood revitalization.