



ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

2020-2024

PREPARED BY:
FLORIDA
HOUSING
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Executive Summary

Introduction

Seminole County receives federal funding from the U.S. Department of Housing and Urban Development (HUD) to conduct housing and community development activities under 24 CFR Part 91: “The Consolidated Planning Process.” The Consolidated Planning process combines planning and reporting requirements for major federal grants such as the Community Development Block Grant (CDBG), the Emergency Solutions Grant (ESG), and the HOME Investment Partnerships Program (HOME), all programs received by Seminole County. As a recipient of funding from HUD, Seminole County recognizes the importance of affirmatively furthering fair housing and completion of an Analysis of Impediments (AI) to Fair Housing Choice.

HUD has a commitment to eliminate discriminatory practices in housing and an obligation under Section 808 of the Fair Housing Act (FHA) to encourage the adoption and enforcement of fair housing laws in federally funded housing and community development programs. Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d et seq.) and regulations in 24 CFR part 1, prohibit discrimination in any program or activity funded in whole or in part by federal funds made available under this part. In addition to its responsibility for enforcing other Federal statutes prohibiting discrimination in housing, HUD has a statutory obligation under Section 109 of the HCD Act of 1974, Title I, which prohibits discrimination based on race, color, national origin, disability, age, religion, and sex within CDBG programs or activities. In addition to protections at the federal level, Seminole County has an ordinance related to administration of funds from the State Housing Initiatives Partnership (SHIP) that prohibits housing discrimination based on race, creed, religion, color, age, sex, marital status, familial status, national origin, or handicap (County Code of Ordinance, Section 40.265).

In pursuit of equal access to opportunity and affirmative enforcement of the FHA, Seminole County contracted with the Florida Housing Coalition, Inc. to develop this AI. The County will monitor progress made on the plan and assess fair housing challenges and opportunities over the next five years.

Purpose

Equal access to housing is fundamental to the health, livelihood, and success of residents, and is an important component of the long-term sustainability of communities across the country. Strong enforcement and affirmative outreach on fair housing law and policy strengthens the pursuit of personal, educational, and employment goals at the individual level and supports equitable access to opportunities in the community. In recognition of equal housing access as an essential right, the federal government, the state of Florida, and Seminole County have all established fair housing choice as a right protected by law.

Segregated housing causes unequal education, unequal access to jobs, and unequal income. Studies have shown the relationship between housing, education, jobs, and the ability to build equity through home ownership.

This report analyzes impediments to fair housing choice including any actions, omissions, or decisions taken because of a resident or household's protected class under the FHA or any other arbitrary factor which restricts housing choices or the availability of housing choices. For a jurisdiction to certify that it will affirmatively further fair housing (AFFH) through fair housing planning, it must:

1. Complete an Analysis of Impediments to Fair Housing Choice (AI).
2. Implement action plans to eliminate any identified impediments.
3. Maintain AFFH records corresponding with implementation of the Consolidated Plan every three to five years.

HUD interprets these three certifying elements to include:

- Analyzing housing discrimination in jurisdictions and working toward its elimination.
- Promoting fair housing choice for all people.
- Providing racially and ethnically inclusive patterns of housing occupancy.
- Promoting housing that is physically accessible to, and usable by, all people, particularly individuals with disabilities.
- Fostering compliance with nondiscrimination provisions of the FHA.

This report analyzes conditions in the private market and public sector that may limit the range of housing choices or impede a person's access to housing. While this report also assesses the nature and extent of housing discrimination, the focus is on identifying impediments that may prevent equal housing access and limit access to opportunity and developing solutions to mitigate or remove such impediments.

Methodology

The analysis in this AI includes a review of background data on the jurisdiction including demographics, income, employment, and a housing profile. The AI also includes a comprehensive review of local laws, regulations, ordinances, and policies related to housing or affecting housing patterns and practices. This AI was prepared according to HUD's Fair Housing Planning Guide, Vol. 1, including extensive public outreach and stakeholder input. The following sections further describe the definitions and data relied upon in the analysis, the process employed in engaging members of the public, and the components reviewed.

Key Definitions

Affirmatively Further Fair Housing – To Affirmatively Further Fair Housing (AFFH) is to comply with the 1968 Fair Housing Act's obligation for state and local governments to improve and achieve more meaningful outcomes from fair housing policies, so that every American has the right to fair housing, regardless of their race, color, national origin, religion, sex, disability, or familial status.

Fair Housing Choice - In carrying out its Analysis of Impediments to Fair Housing Choice, the County used the following definition of "Fair Housing Choice":

- The ability of persons of similar income levels to have available to them the same housing choices regardless of race, color, religion, sex, national origin, familial status, or handicap.

Impediments to Fair Housing Choice - As adapted from the *Fair Housing Planning Guide*, impediments to fair housing choice are understood to include:

- Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin which restrict housing choices or the availability of housing choices.
- Any actions, omissions, or decisions which have the effect of restricting housing choices or the availability of housing choices based on race, color, religion, sex, disability, familial status, or national origin.

Protected Classes - In carrying out its AI, the County used the following definition of Protected Classes:

- Title VIII of the Civil Rights Act of 1968 prohibits housing discrimination based on race, color, national origin or ancestry, sex, or religion. The 1988 Fair Housing Amendments Act added familial status and mental and physical handicap as protected classes.

Affordable - Though local definitions of the term may vary, the definition used throughout this analysis is congruent with HUD's definition:

- HUD defines as "affordable" housing that costs no more than 30% of a household's total monthly gross income. For rental housing, the 30% threshold is inclusive of any tenant-paid utility costs.
- For homeowners, the 30% threshold would include the mortgage payment, property taxes, homeowner's insurance, and any homeowners' association fees.

Data Sources

Decennial Census Data – Data collected by the Decennial Census for 2010 and 2000 is used in this report. Older Census data is only used in conjunction with more recent data to illustrate trends.

American Community Survey (ACS) – Data used for demographics, employment, and economic, and housing section of this plan rely on the 2018 five-year ACS estimates, unless otherwise noted. The five-year ACS offers 60 months of data collected between January 1, 2014 and December 31, 2018. This data is used because it offers estimates with relatively low margins of error and maximizes reliability of data at the census tract level. This second point is of particular importance to fair housing analysis because fair housing choice is often realized on a neighborhood-by-neighborhood basis. The ACS is an ongoing statistical survey that samples a small percentage of the U.S. population every year, thus providing communities with more current population and housing data between each decennial Census.

ACS five-year estimates are used in this report because 1) the ACS multi-year estimates offer more recent data than decennial data, 2) is available for more geographic areas than the ACS 1-Year Estimates, and 3) margins of sampling error are smaller for 5-year estimates compared to 3-year estimates. ACS datasets are published for geographic areas with populations of 20,000 or greater.

Previous Works of Research – This AI is supported by, and in some cases builds upon, previous works of significant local, state, and federal research conducted for or within the County. These works of research may include, but not be limited to, the following:

- Attainable Housing Plan
- 2020-2024 HUD Five-Year Consolidated Plan
- Historic Vision 2020 Comprehensive Plan
- Local Housing Assistance Plan
- Five-Year Public Housing Authority Plans
- 2017 Community Services Block Grant Needs Assessment

Community Participation

Fair Housing Survey – This survey was designed to collect input from a broad spectrum of the community and received responses from residents across the study area. The survey consisted of 26 questions, with a mix of both multiple choice and open-ended questions. In all, there were 413 responses to the survey. To prevent “ballot stuffing,” the SurveyMonkey software was set to prevent submission of multiple surveys from a single IP address. The link to the online survey was distributed through various email distribution lists and posted on County websites and social media accounts.

Hard Copies of the surveys were printed and distributed to groups with no computer access which included the elderly, homeless, and low-income residents Countywide. Community Services delivered and distributed surveys at homeless shelters, neighborhood associations, and non-profit agencies serving homebound seniors.

Public Meetings – The County facilitated three (3) virtual public meetings for residents/stakeholders to contribute to the identification of problems, issues, and barriers to fair housing choice. Social distancing mandates in response to the COVID-19 pandemic did not allow for in-person public meetings. Virtual meetings were held in conjunction with Consolidated Plan meetings and in accordance with HUD waivers allowing virtual public hearings in response to COVID-19. The public meetings informed residents and stakeholders about the Consolidated Plan and Analysis of Impediments, described the process for each, and solicited input regarding affordable housing, community development, economic development, and fair housing needs in Seminole County. The County considered times/locations convenient for residents and stakeholders. Meeting dates, times, and locations are detailed below.

Public Meetings
October 5, 2020 1:00 PM – 2:30 PM
October 12, 2020 1:00 PM – 2:30 PM
October 19, 2020 1:00 PM – 2:30 PM

Summary of Findings

Through a comprehensive review of data and policies, this report identified the following findings:

1. Demographics

- Seminole County has experienced rapid population growth since 1990, increasing from 287,529 residents in 1990 to 455,086 residents in 2018 (*Table 1: Population Trends*).
- The population has seen a major racial shift, with growing Latino, African American, and Asian populations (*Table 4: Race and Ethnicity*).
- There is a single racially/ethnically concentrated area of poverty (R/ECAP) in Seminole County, located west of downtown Sanford (*Figure 4: R/ECAP Areas*).
- The most common disability in Seminole County is an ambulatory disability, which can affect the types of housing accessible to this population (*Table 7: Disability by Type*).
- 13.2% of Seminole County's residents were born outside the United States. A small majority of these residents are from Latin American and the Caribbean, with large populations of Asian

and European Immigrants (*Table 9: Foreign Born Residents*). However, relatively few of these households have limited English proficiency (*Table 10: LEP by Language*).

2. Employment and Economics

- Median incomes in Seminole County vary by race, with the median African American household income (\$45,447) less than 2/3rds the median white household income (\$70,057) (*Table 12: Median Income by race/Ethnicity*).
- Median income also varied by tenure, with renter household median income (\$45,328) only 58% of owner household median income (\$77,775) (*Table 13: Median Income by Tenure*).
- The poverty rate is far higher for African American households (17.5%) and Latino households (16.6%) than white households (8.5%) (*Table 15: Poverty Rate by Race and Ethnicity*). Areas of high poverty were concentrated around Sanford (*Figure 7: Low Poverty Index*).
- African Americans and Latinos participated in the labor market at higher rates than white households but were more likely to be looking for but unable to find a job (*Table 16: Labor Force*).
- People with disabilities were far more likely to be looking for but unable to find a job than the Seminole County residents (*Table 19: Labor Force and Disability*).
- Seminole County Schools, in general, receive extremely high rankings from the Florida Department of Education, with relatively few schools ranked at a C and no D ranked schools (*Table 22: School Grades and Characteristics*). However, black households had much poorer access to quality schools than households of any other race or ethnicity (*Table 25: School Proficiency Index by Race/Ethnicity*).
- White and Asian households in Seminole County were far more likely to have completed a bachelor's degree than African American or Hispanic households (*Table 24: Educational Attainment by race/Ethnicity*).
- Transportation costs are high in Seminole County and residents have relatively poor access to alternative means of transportation (*Figure 13: Low Transportation Cost Index; and Table 14: H+T Index*).

3. Housing Data

- Substandard housing and overcrowding are rare in Seminole County. It still impacts extremely low-income (*Table 33: Housing Problems by Tenure*).
- There are approximately 16,326 cost burdened renter households and approximately 18,163 cost burdened owner households in Seminole County of (*Table 33: Housing Problems by Tenure*).

- Most assisted housing units in the County are Low Income Housing Tax Credit developments. These developments are spread relatively evenly across the County (*Figure 17: Race and Ethnicity and Public Housing*).

4. Housing Discrimination

- There were six hate crimes reported in Seminole County between 2015 and 2018. Four of the six hate crimes were based on the race/ethnicity of the victim (*Table 50: Hate Crimes Data*).

5. Public Sector Impediments

- Seminole County has an insufficient supply of affordable rental housing. The Seminole County Housing Authority does not have enough units of existing affordable housing stock for the number of individuals that are seeking affordable housing. The current wait time for a unit is 36 months.

6. Private Sector Impediments

- Denial rates were highest for Non-Hispanic Black and Other applicants (39.4%) followed closely by Hispanic applicants (36.4%) and lowest for White applicants at 29% (*Table 53: Loan Approval and Denial Rates by Applicant Race/Ethnicity, Seminole County 2018*).
- Reasons for loan application denial vary by race and ethnicity. Collateral, debt-to-income ratio, and credit history were top reasons for denials for all races/ethnicities (*Table 54: Reasons for Loan Denial by Applicant Race/Ethnicity, Seminole County, 2018*).
- For Black applicants, credit history was the most common reason for loan denial (31.9%) followed by debt-to-income ratio at 29.4% (*Table 54: Reasons for Loan Denial by Applicant Race/Ethnicity, Seminole County, 2018*).

Conclusions and Recommendations

The Impediments and Action Plan section details recommendations for actions that Seminole County may pursue to affirmatively further fair housing. The impediments and recommended actions are described below.

#	Impediment	Actions
1	Lack of awareness by residents and landlords of fair housing laws. High number of fair housing complaints based on disability.	<ul style="list-style-type: none"> ▪ Partner with a fair housing training/outreach organization by offering funding and programming support to provide fair housing training to landlords on fair housing laws specific to persons with a disability, foreign born and limited English proficient populations. ▪ Reach out to the disability community during the consolidated planning process. ▪ Place flyers and fair housing information in public facilities, including flyers in “easy read” friendly to people with disabilities. ▪ Conduct targeted outreach and education to landlords in high opportunity/low poverty areas. ▪ Advertise April Fair Housing Month and make public announcements regarding opportunities to learn about fair housing. ▪ Include the HUD fair housing logo on all housing program related documents. 1. Include resources on fair housing that are accessible to people experiencing disability, including “easy read” and brail resources.
2	Lack of affordable rental and owner housing.	<ul style="list-style-type: none"> ▪ Partner with a Community Land Trust (CLT) and support its operations with quality publicly owned surplus lands, unrestricted operating funds, and development subsidies. ▪ Pursue development of ADU funding program to support private adoption and development of ADUs in high opportunity tracts in the County. ▪ Coordinate annual review of FHFC RFAs and identify deployable public and private resources to ensure applications are submitted to relevant RFA opportunities. ▪ Research establishing a mandatory inclusionary zoning ordinance in high opportunity neighborhoods undergoing significant redevelopment. ▪ Implement a SHIP annual rental assistance strategy, in addition to rental assistance for households experiencing homelessness.
3	Poor credit history and collateral as a barrier to homeownership.	<ul style="list-style-type: none"> ▪ Expand access to credit counseling services for low-income and protected classes by partnering with a credit counseling agency and conducting outreach to majority-minority census tracts.

Community Profile

The goal of the Community Profile is to provide data and analysis to help guide decision makers in Seminole County towards the adoption of policies and practices that address impediments to fair housing choice and use CDBG, HOME, and ESG funding for strategies that have the greatest impact for low- and moderate-income residents and persons protected by fair housing laws.

The Community Profile is divided into four sections:

- The first is the Jurisdictional Background, which provides a brief history of the County.
- The second section is the Demographic Profile, which examines the County from the perspective of its people. Race and ethnicity, age, disability status, and other variables are explored. This section provides the foundation to determine who lives in the jurisdiction and what their needs are, including housing demand.
- The third section, the Economic Profile, looks at the job market and the financial environment for residents. Factors like income, employment status, and poverty are analyzed and compared to factors in the demographic analysis to determine if disparities exist between racial and ethnic groups and persons with disabilities. In addition, this section reviews transportation trends, as there is a relationship between transportation and economic status.
- The fourth section, the Housing Profile, provides an overview of the County's housing stock. Multiple housing variables are explored, including home values, rents, occupancy, and age of housing to provide a snapshot of the physical environment of region. This section outlines the supply of the available housing, including affordable housing, and the degree to which it meets demand.

Together, these components provide a data-driven view of the jurisdiction that will advance fair housing planning efforts and identify impediments to fair housing choice.

Jurisdictional Background

Seminole County was established on April 25, 1913, out of the northern portion of Orange County by the Florida Legislature. It was named for the Seminole people who historically lived throughout the area. According to the U.S. Census Bureau, the county has an area of 345 square miles (890 km²), of which 309 square miles is land and 36 square miles is water. It is Florida's fourth smallest county by land area and third smallest by total area. The County is considered the historical gateway to interior Central Florida via the St. John's River.

Seminole County is located north of Orlando along the Interstate 4 corridor. Its location between Volusia County and Orange County has made it one of Florida's fastest-growing counties. Historically, the County has served as a suburb for Orlando. However, Seminole County's role as a bedroom community within the region has undergone substantial change. In 1990, two-thirds of the County's workforce left the County to go to work every morning, by 2005, this trend reversed with approximately 63.2% of the workforce both living and working within the County.

The County's school district became one of the few districts to adopt impact fees. By 1995, its sustained focus on academics made the district one of the best in Florida. In a Newsweek national ranking, all Seminole County's high schools ranked in the top 3%. Good schools are a major factor in corporate relocation, impacting economic development. The County's expressway and interstate highway system, and the new Central Florida Commuter Rail System will efficiently connect Seminole County with the larger region. These connections generated continued growth into the center of the County. However, the County's eastern Rural Area will remain out of the County's urban services boundary as part of the County's rural conservation efforts and remain largely low density/rural into the future. Collectively, the combination of location and wise community investment made Seminole County the corporate and residential regional location of choice in Central Florida. Rising property values and a relatively strong residential development market are still expected in Seminole County despite the statewide slowdown in housing activity in 2006-2008.

Seminole County is comprised of seven cities including: Altamonte Springs, Casselberry, Lake Mary, Longwood, Oviedo, Sanford, and Winter Springs. Its county seat and largest city is Sanford. Seminole County is part of the Orlando-Kissimmee-Sanford Metropolitan Statistical Area. The following map delineates Seminole County's boundaries.

Seminole County

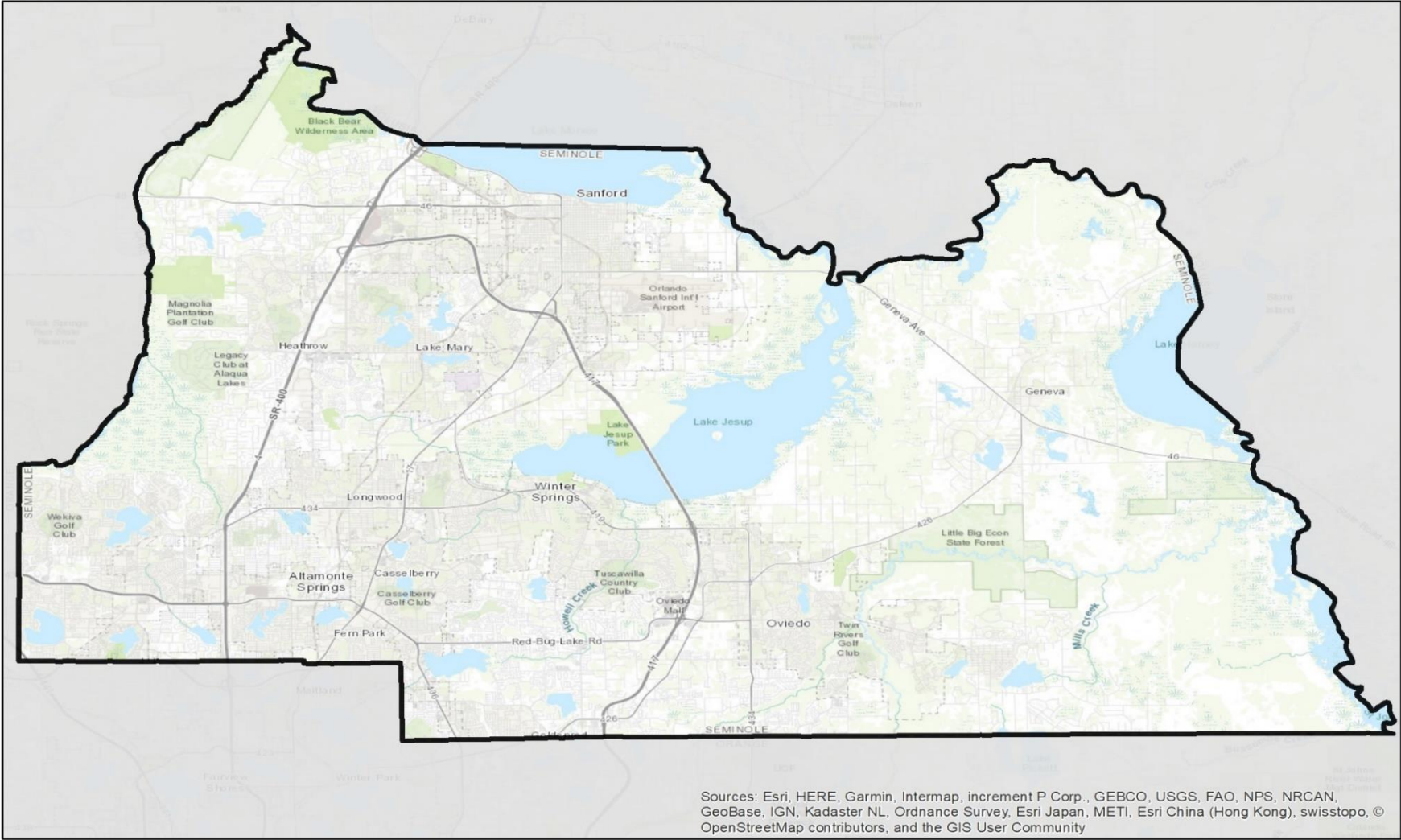


Figure 1: Seminole County Boundaries
Data Source: Seminole County

Demographic Profile

Understanding who lives throughout Seminole County, where they live, and how that has changed provides a reference point for identifying factors that contribute to fair housing choice. The Demographic Data Profile explores demographic variables for protected class groups. The information provided here on population, sex, age, race, familial status, disability, foreign born population, and limited English proficiency, corresponds to protected classes under the Fair Housing Act (FHA) and local protected classes. Examining demographics permits analysis of the degree to which certain types of discrimination are more likely than others based on the population of persons by race/ethnicity, sex, familial status, persons with a disability, place of origin, and where those populations live. This helps the County to understand where and how people might be at risk of housing discrimination and other housing issues.

The demographic data sections of this AI use two primary methods of analysis: quantitative and geospatial. Quantitative data is used to identify disparities in populations, employment and economic indicators, and housing metrics between protected classes and the population at large. Geospatial data is used to identify geographic patterns presented in the community, to help identify neighborhoods of particular concern, and better illustrate the relationship between housing choice and access to services and opportunities.

Population

This section reviews population trends over three-decade span from 1990 to 2018. Population change, particularly by race, is central to understanding fair housing issues in a jurisdiction. This change gives a broad view of whether the area is a place experiencing growth. A growing population usually represents a place that is attractive to new households while a shrinking or stable population may reflect unmet resident needs.

The population increased by over 50% since 1990. Population growth is generally a positive indicator, but can create challenges, particularly for the housing market. When population grows faster than housing stock, the overall demand increases. This drives housing prices higher. Increased prices make it increasingly difficult to locate affordable, safe, and secure housing, particularly for lower income households. Additionally, from a fair housing perspective, a growing Latino and Black/African American community may require fair housing protections for those classes, particularly related to de facto segregation patterns as they exist in Sanford.

Table 1: Population Trends				
	1990	2000	2010	2018
Total population	287,529	373,666	417,330	455,086

Data Source: 1990 Decennial Census, Table DP1; 2000 Decennial Census, Table DP1; 2010 5 Year ACS, Table DP05; American Community Survey, Table DP05, 2018 ACS 5-Year Estimates

While data presented in tables is helpful, geospatial information (maps) can provide a more nuanced understanding of race and class in Seminole County. For this report, some maps were collected from the HUD AFFH Tool which is available online at <https://egis.hud.gov>. In other cases, maps were prepared using ESRI ArcGIS and publicly available data sets. The maps below use dot density mapping to show concentrations of racial and ethnic groups in the County.

Viewed spatially, between 1990 and 2010 the population across the county grew dramatically, with many Hispanics moving into the formerly far whiter areas in the south and central portions of the County. The highest concentration of African Americans still in Sanford to the North, with a racially/ethnically concentrated area of poverty (R/ECAP) that has not changed much in two decades.

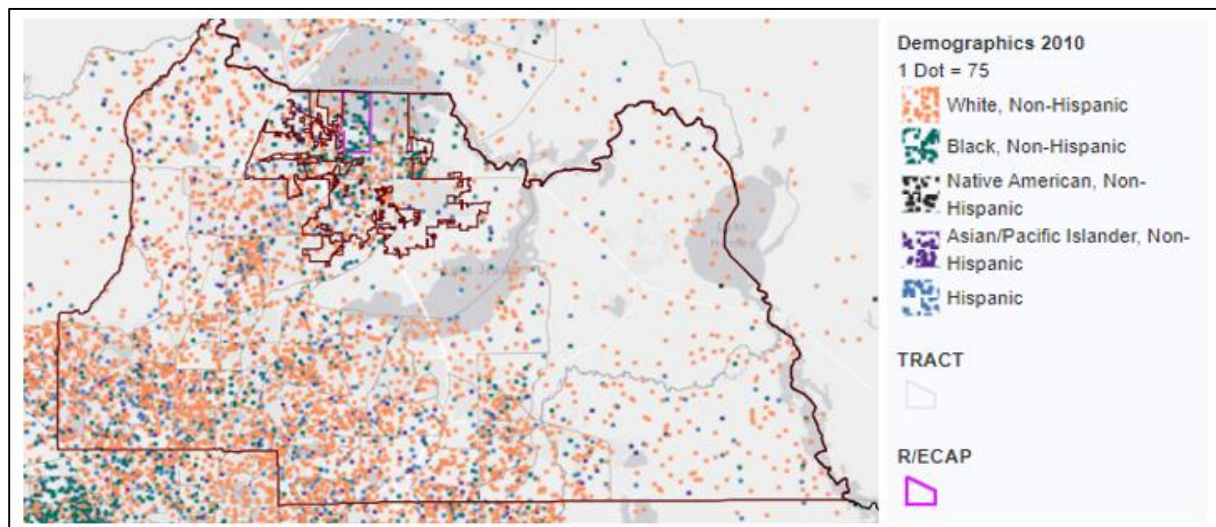


Figure 2: 2010 Population Trend by Race/Ethnicity
Data Source: AFFH Mapping Tool, AFFHT006, 2020 Map 2

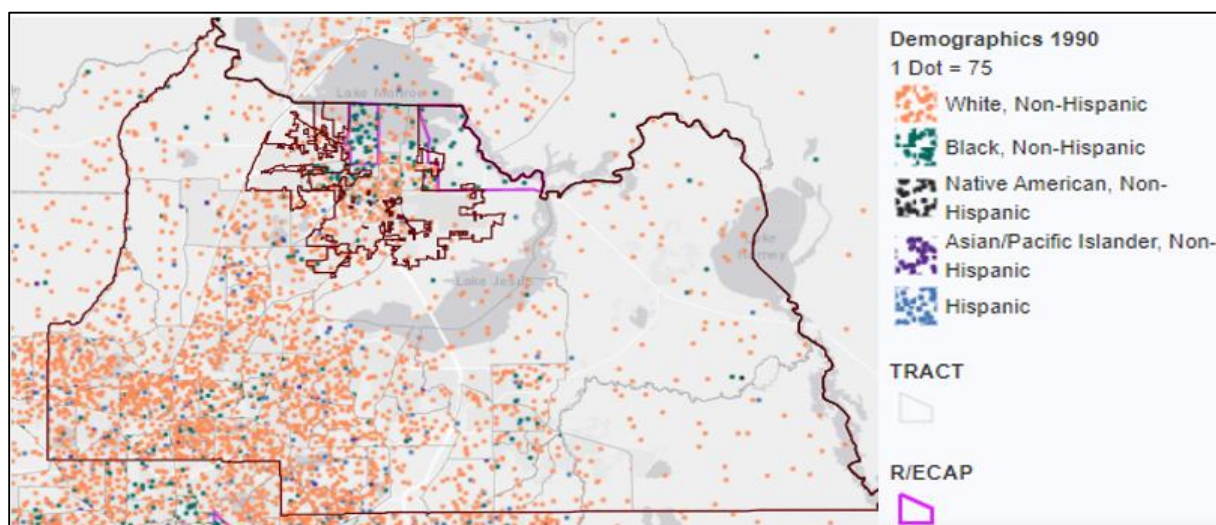


Figure 3: 1990 Population Trend by Race/Ethnicity
Data Source: AFFH Mapping Tool, AFFHT006, 2020 Map 2

Sex

Sex is a protected class. Discrimination based on sex manifests in multiple ways. For instance, men and women may be discouraged from living in certain neighborhoods or homes in a discriminatory way by realtors or landlords with preconceived notions of how someone might act, or landlords may discriminate based on sex by treating persons differently based on their sex.

Seminole County has more women (51.7%) than men (48.3%). In 2018 there were more than 15,000 females than males (15,216). Nationally males make up 49.2% of the population. There are proportionately more females than males in Seminole County when compared to the national average.

Table 2: Number and Share of Residents by Sex		
	#	%
Total population	455,086	
Male	219,935	48.30%
Female	235,151	51.70%
Sex ratio (males per 100 females)	93.5	

Data Source: Table DP05, 2018 ACS 5-Year Estimates

Age

People can face discrimination because of their age. Age discrimination may be directed to persons considered young or elderly. In both cases, landlords, real estate brokers, and lenders make assumptions about behavior and financial capability in a discriminatory way.

The age distribution of a jurisdiction is vitally important to the housing market and a jurisdiction's economy. The needs of residents can vary significantly depending on their stage of life. Residents nearing retirement or in retirement often seek to downsize into smaller homes and may prioritize accessibility and transportation options over other amenities. Young adults, particularly new families, have different housing demands and tend to look for homes with enough space for the family. Understanding the age of the population is important for determining demand for different housing types and helps set realistic fair housing goals for the County. Seminole County has a relatively young population when compared to the State of Florida. The median age in Seminole County is 39.2 years compared to 41.9 years for state. The 2018 American Community Survey data shows approximately 25 percent of the population in Seminole County is under the age of 25. The two populations, seniors 60 and older and persons under 25, make up roughly 40% of the County's total population.

Table 3: Population Count and Share of Total Population by Age		
	#	%
Under 5 years	24,115	5.30%
5 to 9 years	27,007	5.90%
10 to 14 years	27,593	6.10%
15 to 19 years	28,215	6.20%
20 to 24 years	29,175	6.40%
25 to 34 years	65,381	14.40%
35 to 44 years	61,743	13.60%
45 to 54 years	65,388	14.40%
55 to 59 years	30,329	6.70%
60 to 64 years	28,677	6.30%
65 to 74 years	39,798	8.70%
75 to 84 years	18,270	4.00%
85 years and over	9,395	2.10%
Median age (years)	39.2	(X)

Data Source: Table DP05, 2018 ACS 5-Year Estimates

Race/Ethnicity

Federal housing policy and local deed restrictions intentionally segregated housing by race for decades. Those policies, as well as the many local and state discrimination policies, are no longer legal, however; many communities still feel the effects of those policies due to de facto segregation. An unfortunate truth within the United States, is the link between a person's race or ethnicity and their access to housing and economic opportunities. Racial and ethnic minorities face barriers to accessing housing and economic opportunities.

Seminole County is predominately white jurisdiction with 61.3% of its residents classified as white, non-Hispanic. The county also has a significant (20.7%) Latinx presence. Black or African Americans make up 10.7% of the County's population.

Due to the dramatic growth in total population since 1990, almost all racial and ethnic groups have increased in Seminole County. The County has experienced a steady increase in the Latinx population as a share of total population since 1990 with a corresponding decline in the percent white population. Asian Americans have grown from 1.6% to 4.3% while African Americans have held steady as a percentage of the total population, from 8.3% to 10.7%. The largest increase has been among Latinx residents, rising over three times as a percentage of population from 6.5% to 20.7%.

Table 4: Race and Ethnicity								
	1990		2000		2010		2018	
	#	%	#	%	#	%	#	%
Total population	287,529		373,666	--	417,330		455,086	--
Hispanic or Latino (of any race)	18,606	6.5%	43,541	11.7%	67,555	16.2%	94,168	20.7%
White alone	239,612	83.3%	278,870	74.6%	282,481	67.7%	279,063	61.3%
Black or African American alone	23,801	8.3%	35,528	9.5%	42,123	10.1%	48,821	10.7%
American Indian and Alaska Native alone	754	0.3%	2,270	0.6%	872	0.2%	723	0.2%
Asian alone	4,588	1.6%	10,731	2.9%	15,243	3.7%	19,749	4.3%
Native Hawaiian and Other Pacific Islander alone	NA		390	0.1%	240	0.1%	257	0.1%
Some other race alone	168	0.1%	2,336	0.6%	1,188	0.3%	2,069	0.5%
Two or more races	NA		NA	--	7,628	1.8%	10,236	2.2%

Data Source: 1990 Decennial Census, Table DP1; 2000 Decennial Census, Table DP1; 2010 5 Year ACS, Table DP05; American Community Survey, Table DP05, 2018 ACS 5-Year Estimates

Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs)

Racially/ethnically concentrated areas of poverty (R/ECAPs) are HUD designated census tracts that have both an extremely high concentration of minorities (50% or more) and extremely high poverty (40% or more of households are at or below the poverty line or three or more times the poverty rate for the metropolitan area).

There is only one R/ECAP in Seminole County, located in the northern portion of the County to the west of downtown Sanford. The following map shows the location of the R/ECAP.

Current R/ECAP Areas

9.5 4.75 0 Miles

—Primary Roads ■ Current R/ECAP Areas

Sources: Esri, DeLorme, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Swisstopo, GEBCO, USGS, AeroGRID, IGN, Esri, the Swisstopo, NCCO, OpenStreetMap contributors, and the GIS User Community

Data Source: HUD R/ECAP Data Files

The following table provides a breakdown of the race and ethnicity of households living in the R/ECAP, as well as the poverty rate. The area is majority African American. 16.5% of households are Hispanics or Latinx of any race and 18.8% are white alone. The poverty rate is 46.7%.

Table 5: R/ECAP Demographics and Poverty		
Hispanic or Latino (of any race)	393	16.50%
White alone	449	18.80%
Black or African American alone	1,271	53.20%
American Indian and Alaska Native alone	33	1.40%
Asian alone	164	6.90%
Native Hawaiian and Other Pacific Islander alone	0	0%
Some other race alone	0	0%
Two or more races	79	3.30%
Poverty Rate	1,098	46.70%

Data Source: Table S1701, 2018 ACS 5-Year Estimates

Familial Status

Familial status, or households with children under the age of 18, is a protected class under the Fair Housing Act, and holds long-term policy implications for housing development, land use, and regulations. Most households in Seminole County are family households (67.6%), but only a small variety of households are families with children (28.2%). The average household has 2.58 people, while the average family household has 3.09 people.

Table 6: Household Size	
Total households	179,274
Average household size	2.58
Total families	121,209
% of All Households Families	67.6%
Average family size	3.09
Households with own children of the householder under 18 years	50,622
% of All Households with Children	28.2%
Under 6 years only	22.1%
Under 6 years and 6 to 17 years	17.9%
6 to 17 years only	60.0%

Data Source: Table S1701, 2018 ACS 5-Year Estimates

Disability

People with disabilities are a protected class under the Fair Housing Act and state and local fair housing ordinances. Persons with disabilities face a wide range of housing discrimination challenges based on reasonable accommodations in rental property and homeownership units, along with other discrimination. A 2017 study conducted by HUD's Office of Policy Development and Research found people with intellectual and developmental disabilities faced a negative stigma from housing providers and their agents; inappropriate requests to disclose personal, disability, and health related information; a lack of understanding about reasonable accommodations; and steering towards specific housing based on an individual's disability. People with disabilities, matched with people without disabilities to control for income, race, gender, and age, were dramatically less likely to receive responses to their inquiries about housing, were more likely to be told that advertised units were not available, were more likely to be steered away from units and less likely to be offered a tour of units.

Residents who have a disability face additional challenges, particularly when it comes to housing. Finding affordable housing is especially difficult for those who need units that have modifications or can be modified for wheelchairs, shower supports, ramps, and other accessibility aides. Seminole County's relatively older population compared to the national average should make disability a particular focus, as age and disability are often connected.

Different disabilities present challenges to ensuring fair housing depending on disability type. In Seminole County, the greatest share of persons with a disability are those with an ambulatory difficulty – those with difficulties moving unassisted without the aid of certain devices like a wheelchair or cane. The second highest share of persons with a disability is persons with an independent living difficulty. This group of persons includes those with a disability because of a physical, mental, or emotional problem, having difficulty running errands alone such as visiting a doctor's office or shopping.

Table 7: Disability by Type		
	#	%
With a hearing difficulty	12,671	2.80%
With a vision difficulty	8,913	2.00%
With a cognitive difficulty	18,364	4.30%
With an ambulatory difficulty	23,941	5.60%
With a self-care difficulty	10,158	2.40%
With an independent living difficulty	17,664	5.00%

Data Source: Table S1701, 2018 ACS 5-Year Estimates

Disability often also closely correlates with race. In many parts of the state, African Americans see double the rate of disability as white Americans. However, in Seminole County, rates of disability between African Americans, whites, and Latinos (the three largest racial/ethnic groups) are within a few percentage points. The small American Indian and Alaskan Native population has an extremely high rate of disability.

Table 8: Disability by Race		
	#	%
Black or African American alone	5,576	10.60%
American Indian and Alaska Native alone	254	26.60%
Asian alone	996	5.00%
Native Hawaiian and Other Pacific Islander alone	28	9.00%
Some other race alone	1,663	11.60%
Two or more races	1,205	8.10%
White alone, not Hispanic or Latino	29,953	10.80%
Hispanic or Latino (of any race)	9,171	9.80%

Data Source: Table S1701, 2018 ACS 5-Year Estimates

Just as people with disabilities in Seminole County are not disproportionately likely to be of a particular race, there is no clear geographic distribution for persons with disabilities. The next two maps show disabilities by type and location. People with disabilities live across the County with no clear areas of concentration.

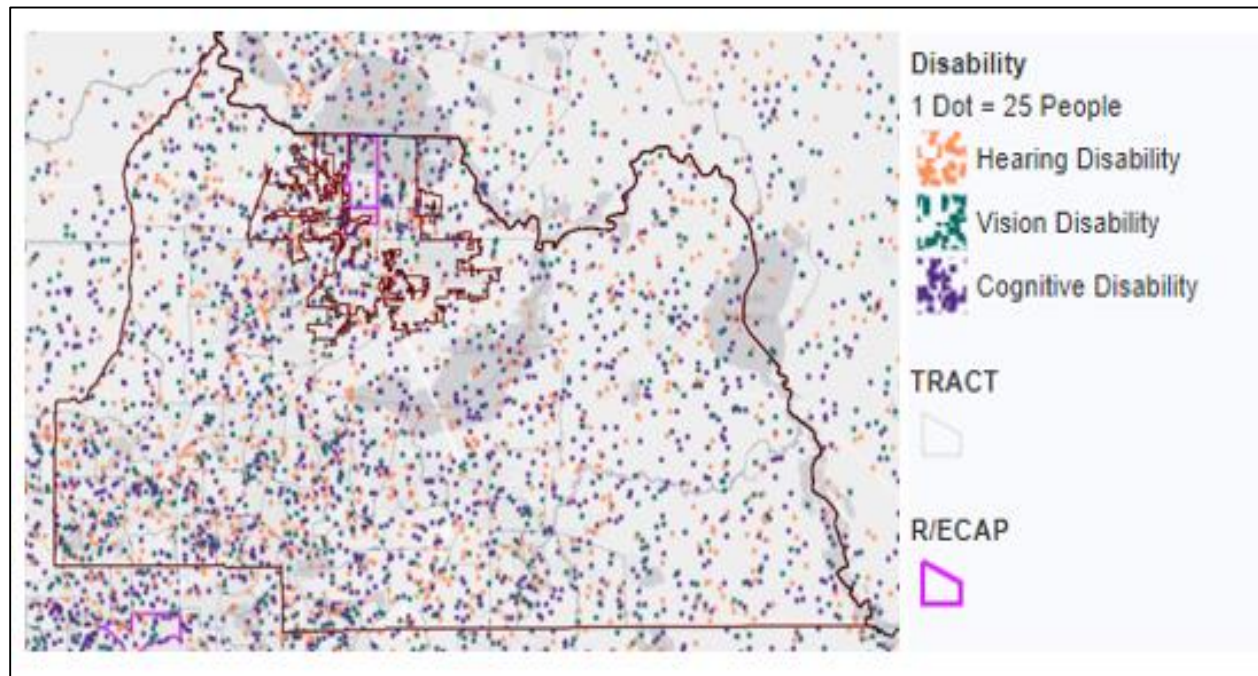


Figure 5: Disability Map 1 Hearing, Vision and Cognitive Disabilities
Data Source: AFFH Mapping Tool, AFFHT006

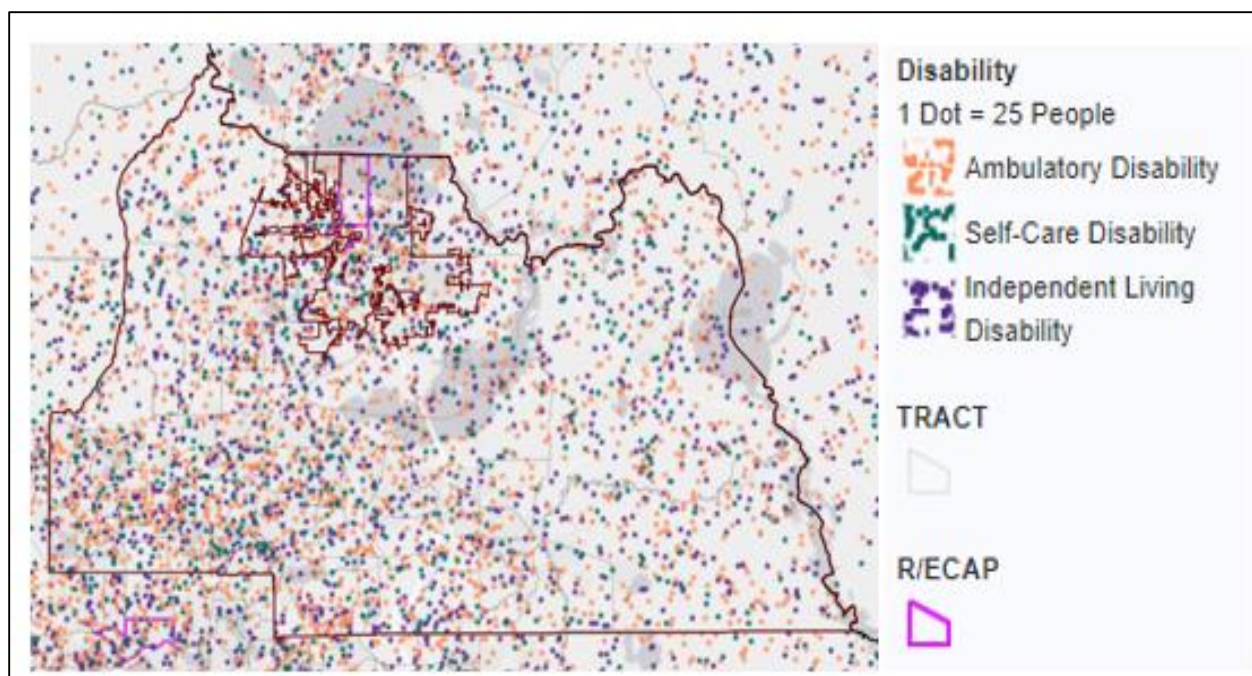


Figure 6: Disability Map 2, Ambulatory, Self-Care, and Independent Living Disabilities
Data Source: AFFH Mapping Tool, AFFHT006

Foreign Born

National origin is a protected class under the Fair Housing Act. This section reviews data on the number of native and foreign-born persons in Seminole County and their share of the total population. People can discriminate against foreign born persons both intentionally and inadvertently.

Over 60,000 of Seminole County's 455,086 residents were born overseas (13.2%). The largest share of these residents (31,858,) more than 50%, are from Latin America and the Caribbean. Another 15,280 are from Asia, with smaller populations from Europe, Africa, and the rest of North America (Canada and Mexico).

Table 9: Foreign Born Residents	
Total Foreign-Born Population	60,816
Europe	8,339
Asia	15,280
Africa	3,262
Oceania	137
Latin America and the Caribbean	31,858
Northern America	1,940

Data Source: Table DP02, 2018 ACS 5-Year Estimates

While not a protected class under the Fair Housing Act, limited English proficiency (LEP) is often related to the protected class of national origin. People born outside of the US are disproportionately likely not to speak English proficiently. HUD issued guidance on LEP on September 15th, 2016, stating: "Housing

providers are ... prohibited from using limited English proficiency selectively or as an excuse for intentional housing discrimination. The law also prohibits landlords from using limited English proficiency in a way that causes an unjustified discriminatory effect.”

There are relatively few LEP residents in Seminole County. Of those, the majority speak Spanish, with another 927 speaking Asian and Pacific Island Languages and 705 speaking other Indo-European Languages.

Table 10: Limited English Proficiency Households	
	#
All households	5,603
Spanish	3,894
Other Indo-European languages	705
Asian and Pacific Island languages	927
Other languages	77

Data Source: Table S1602, 2018 ACS 5-Year Estimates

It is beneficial to have data on households with limited English proficiency because it can assist the Seminole County Community Services Department in determining if additional resources are necessary to serve these clients. This could result in the hiring of bilingual staff, using translation services from the state and/or other agencies and providing other resources and support.

Economic Profile

The market for housing and the availability of affordable housing is tied to the two fundamental economic forces: supply and demand. In theory, the market reaches an equilibrium where supply equals demand, but in practice it is much more complicated. Demand is not a static data point, it is the culmination of the needs, wants, and resources available to members of the population. A crucial factor in demand is the economic environment for households. Their income, employment opportunities, education, and availability of transportation all play a part in the demand for housing, both market-rate and affordable.

Household Income

In Seminole County, the median household income in 2018 was \$63,760. Residents were concentrated in the \$50,000 to \$149,999 income brackets, though with a considerable share of residents making less than \$25,000 (17.3%) along with a sizable portion making over \$150,000 (13.9%).

Table 11: Household Income	
Household Income Category	Share of Total Households
Total Households	167,304
Less than \$10,000	5.70%
\$10,000 to \$14,999	3.30%
\$15,000 to \$24,999	8.30%
\$25,000 to \$34,999	9.00%
\$35,000 to \$49,999	12.60%
\$50,000 to \$74,999	18.60%
\$75,000 to \$99,999	13.40%
\$100,000 to \$149,999	15.20%
\$150,000 to \$199,999	6.80%
\$200,000 or more	7.10%
Median income (dollars)	\$63,760
Mean income (dollars)	\$86,617

Data Source: Table S1901, 2018 ACS 5-Year Estimates

Household Income by Race/Ethnicity

Race and ethnicity are closely related to income in the county. Members of “some other race” category (\$43,520) and Black/African Americans (\$45,447) make less than other income groups, followed by Latinos (\$50,709). White residents (\$70,057) and Asian residents (\$81,385). Understanding the relationship between race, ethnicity, and economic opportunities is important, particularly if race and ethnicity are correlated with location. When an area has a large minority population with a low AMI, it is possible the area meets HUD’s definition of a R/ECAP. R/ECAPs and other majority-minority, high poverty areas are a top priority to address within the AI and may require focused grant fund expenditures (Figure 4. R/ECAP Areas

Data Source: HUD R/ECAP Data Files

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Table 12: Median Income by Race/Ethnicity	
Black or African American	\$ 45,447
American Indian and Alaska Native	\$ 58,459
Asian	\$ 81,385
Native Hawaiian and Other Pacific Islander	-
Some other race	\$ 43,520
Two or more races	\$ 52,689
Hispanic or Latino origin (of any race)	\$ 50,709
White alone, not Hispanic or Latino	\$ 70,057

Data Source: Table 21903, 2018 ACS 5-Year Estimates

While there are large income disparities by race, housing tenure (whether a household rents or owns their own home) is more severe. The median owner makes over \$14,000 over the area median, while renters (who are an overall smaller share of the County's population), make \$18,432 less than the County median.

Table 13: Median Household Income by Tenure	
Owner occupied (dollars)	\$77,775
Renter occupied (dollars)	\$45,328

Data Source: Table B25119, 2018 ACS 5-Year Estimates

Using data provided by HUD, it is possible to determine the number of households making incomes at various levels of the HUD Area Median Family Income (HAMFI) and their breakdown by family size and age. Both small (2 person households) and large (households with 5 or more people) were less likely than the County wide average to live below HAMFI. Household with older members, particularly households with elderly members (someone age 75 or above) and households with young children were more likely than the county average to make below the median income.

Table 14: Count of Households by HUD Area Median Family Income						
	0-30% HAMFI	>30-50%	>50-80%	>80-100%	>100%	% Below
Total Households	10,395	11,095	18,650	12,210	80,860	39%
Small Family Households (2 Persons)	3,135	3,299	6,930	4,685	44,050	29%
Large Family Households (5+)	395	604	824	744	5,030	34%
Household contains at least one person 62-74 years of age	2,002	2,827	4,420	2,694	16,782	42%

Household contains at least one person age 75 or older	1,206	2,152	3,035	1,479	5,709	58%
Households with one or more children 6 years old or younger	1,272	1,091	2,319	1,428	8,374	42%

Data Source: 2011-2015 CHAS Estimates

Poverty

Poverty and housing insecurity are principal drivers of poor household outcomes in health, education, and quality of life. These effects are most pronounced in areas with high concentrations of poverty, where a significant share of an area's residents live under the poverty line. From a fair housing perspective, if protected classes are segregated in neighborhoods with high poverty rates, policy makers should understand why those segregation patterns exist and work to address conditions that have a disparate impact on protected class members living in those communities.

The poverty rate in Seminole County is 11.4%, but varies dramatically by race and ethnicity. The poverty rate for Black or African American households is 17.5%, 6.1% higher than the County average. Hispanic and Latinx residents also have a higher poverty rate, at 16.6%, while white residents' poverty rate is lower, at 8.5%. Asian residents' poverty rate is higher than white residents (9.7%), but lower than the County average. While there are few American Indian and Alaskan natives (29.6%), Native Hawaiian and Other Pacific Islanders (24.4%), some other race alone (21.9%), or people of two or more races (19.9%), the poverty rates for these groups are the highest.

Table 15: Poverty Rate by Race and Ethnicity			
	Total Population	Population in Poverty	Poverty Rate (%)
All Residents	450,947	51,442	11.4
Black or African American alone	52,305	9,141	17.5
American Indian and Alaska Native alone	954	282	29.6
Asian alone	19,947	1,942	9.7
Native Hawaiian and Other Pacific Islander alone	312	76	24.4
Some other race alone	14,313	3,141	21.9
Two or more races	14,826	2,952	19.9
Hispanic or Latinx origin (of any race)	93,653	15,519	16.6
White alone, not Hispanic or Latino	276,324	23,561	8.5

Data Source: Table S1701, 2018 ACS 5-Year Estimates

The low poverty index measures the degree of poverty existing within a given neighborhood. It uses both family poverty rates and the percentage of households receiving public assistance to determine a score. Higher values on the index indicate a neighborhood where one can expect to be exposed to less poverty and is considered a positive indicator for resident outcomes. Values are percentile ranked (0 – 100) for every tract in the country.

Seminole County has several extremely high poverty census tracts (with the majority located in the area around Sanford) that are noted on the following map in red. These Census tracts are among the highest concentrations of poverty in the country, scoring between the 2nd and 29th percentile of Census tracts nationwide. In several of the larger, less dense census tracts to the south, south east, and central west of the county (noted in bright green). These Census tracts have extraordinarily low levels of poverty, lower poverty rates than between 85% and 99% of the Census tracts in the country.

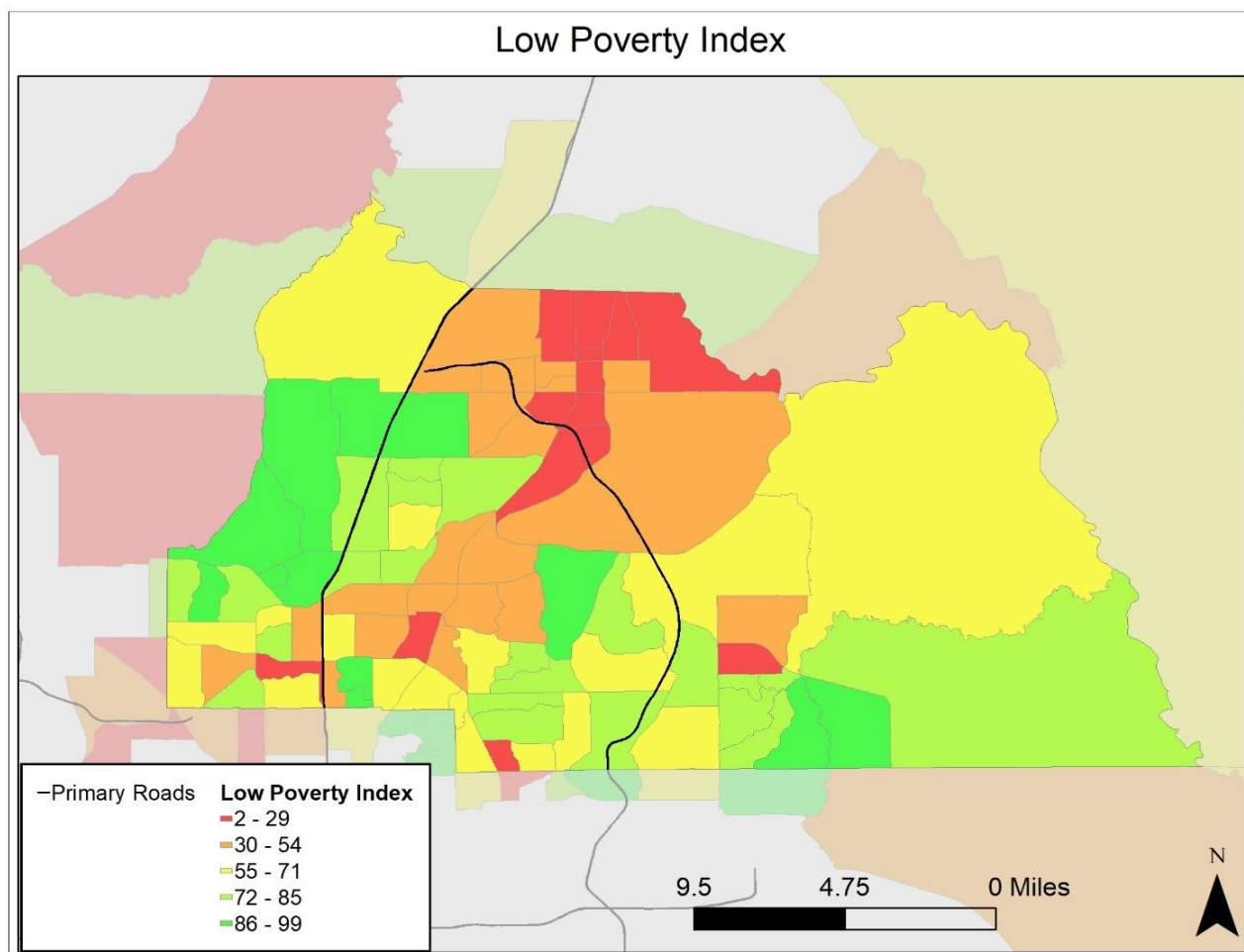


Figure 7: Low Poverty Index
Data Source: HUD Low Poverty Index

Employment

The employment section reviews geographic and tabular data to provide a snapshot of Seminole County's employment environment in 2018. This includes an analysis of tables on race/ethnicity, disability status, and poverty and employment. It also examines key economic statistics including the labor force participation rate, the employment/population ratio, and the unemployment rate.

The labor force includes all people classified as belonging to the civilian labor force, plus members of the U.S. Armed Forces. The civilian labor force consists of people classified as employed or unemployed who are not in the U.S. Armed Forces. The labor force participation rate is calculated by dividing the total number of persons in the labor force by the number of total person population over the age of 16.

The employment to population ratio is the number of employed persons as a percentage of the civilian noninstitutionalized population aged 16 and older. It is meant to show the percentage of the population that is currently working. People who are primarily ineligible, unable, or unlikely to participate in the labor force are residents of institutional group quarters. The institutionalized population is persons residing in institutional group quarters such as adult prisons, juvenile facilities, skilled-nursing facilities, and other institutional facilities such as mental (psychiatric) hospitals and in-patient hospice facilities.

The unemployment rate is calculated by dividing the number of unemployed persons by the number of persons in the civilian labor force. A person is considered unemployed if they are 16 years old and over are classified as unemployed if they (1) were neither "at work" nor "with a job but not at work", and (2) were actively looking for work during the last 4 weeks, and (3) were available to accept a job. They are considered employed if they are 16 years old and over who were either (1) "at work" or (2) were "with a job but not at work."

Labor force participation and employment/population ratio is consistent across the three largest race and ethnicity groups (Black, white, and Latino). However, the unemployment rate in 2018 was dramatically higher black and Latino residents as white residents (8% for black residents, 7% for Latinos, compared to 4.7% for white residents). Note that, in the wake of COVID-19's impact on the tourism and service sectors (industries with many minority workers), these disparities have likely increased in 2020.

Labor Force Characteristics	Labor Force Participation	Employment/ Population Ratio	Unemployment Rate
Black or African American alone	65.30%	60.00%	8.00%
American Indian and Alaska Native alone	52.40%	41.80%	20.30%
Asian alone	66.40%	63.90%	3.70%
Native Hawaiian and Other Pacific Islander alone	45.20%	43.50%	3.60%
Some other race alone	70.10%	62.10%	11.30%
Two or more races	65.50%	58.90%	9.60%
Hispanic or Latino origin (of any race)	67.60%	62.50%	7.00%
White alone, not Hispanic or Latino	64.30%	61.10%	4.70%
Population 20 to 64 years	78.80%	74.50%	5.20%

Data Source: Table S2301, 2018 5-Year ACS Estimates

The following chart shows unemployment over time in Seminole County Between 1990 and 2019. Unemployment spiked in the county in the early 90s, again in 2001-2001, and hit an all-time high during the great recession between 2009 and 2012.

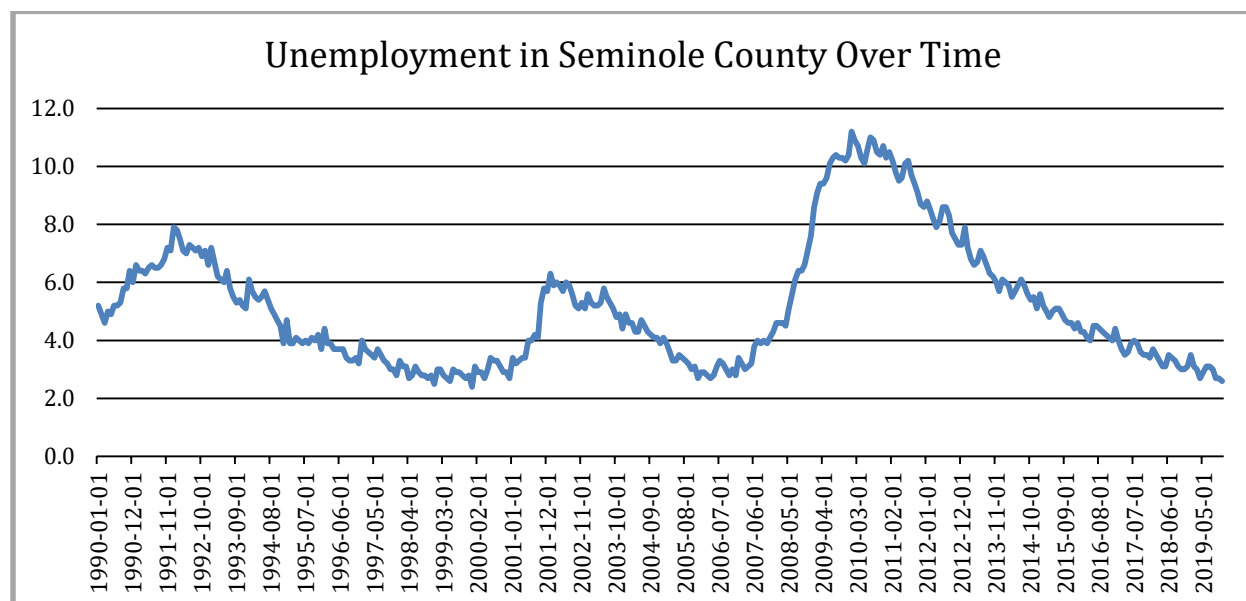


Figure 8: Unemployment Over Time Between January 1990 and November 2019

Data Source: Federal Reserve Bank of St. Louis

Impact of Covid-19

In early 2020, the United States began to experience the effects of the novel Coronavirus, (COVID-19). The illness posed dangers worldwide because of the ease of transmission and the lack of a known treatment. Many communities enacted social distancing protocols and other safety measures to slow the spread of the virus. The pandemic eventually resulted in a shutdown that limited large gatherings and caused the closure of major industries. The closures resulted in furloughs, layoffs, and reductions in available work hours. Workers in Central Florida were particularly hard hit because of the impact closures had on tourism and associated service industries. During the shutdown, all major theme parks closed in the area, including Walt Disney World and Universal Studios.

The COVID-19 pandemic has hit lower income households and senior citizens especially hard. The loss or reduction in available full-time work put many renters and homeowners at risk for eviction or foreclosure of homes, because of their inability to make ends meet due to a lack of stable employment. Seminole County and the rest of the Country are working to provide rental, mortgage, and utility assistance to eligible households. Seminole County has also been partnering with nonprofit partners to assist in providing services to the community, especially for the households with limited financial means. The health crisis caused unemployment and further exacerbates hardships for lower income families.

Share of Workers by Industry

A variety of industries are represented in Seminole County. The most common is educational services, health care, and social assistance, with a full 22% of the employed population working in this sector.

Table 17: Share of Workers by Industry		
Share of Workers by Industry	#	%
Civilian employed population 16 years and over	226,769	----
Agriculture, forestry, fishing and hunting, and mining:	787	0.3%
Construction	13,860	6.1%
Manufacturing	12,420	5.5%
Wholesale trade	5,629	2.5%
Retail trade	26,078	11.5%
Transportation and warehousing, and utilities:	9,053	4.0%
Information	7,413	3.3%
Finance and insurance, and real estate and rental and leasing:	21,709	9.6%
Professional, scientific, and management, and administrative and waste management services:	37,160	16.4%
Educational services, and health care and social assistance:	49,945	22.0%
Arts, entertainment, and recreation, and accommodation and food services:	23,925	10.6%
Other services, except public administration	11,046	4.9%
Public administration	7,744	3.4%

Data Source: Table S2403, 2018 ACS 5-Year Estimates

Largest Employers

The following table provides the list of the 20 largest private sector employers by number of employees in Seminole County according to the Chamber of Commerce. These employers cover a broad range of business types, from software to financial services, medical, and construction services.

Table 18: Major Private Sector Employers			
Company	City	Business Type	Employees
Convergys	Lake Mary	Software	1,771
Florida Hospital	Altamonte Springs	Medical	1,671
Chase Bankcard Services	Heathrow	Financial Services	1,634
Orlando Regional Healthcare	Longwood	Medical	1,089
American Automobile Association	Heathrow	Service	1,006
Embarq	Altamonte Springs	Service	986
Sears Home Improvement Products	Longwood	Home Improvement Products	924
Try City Electrical Contractors	Altamonte Springs	Electrical Contractors	803
Central Florida Regional Hospital	Sanford	Medical	786
Fiserv	Lake Mary	Software	661
BNY Investments	Lake Mary	Financial Services	650
AIG Marketing Inc.	Lake Mary	Marketing	638
Symantec Software Global LLC	Heathrow	Software	621
Progress Energy	Oviedo	Electric Utility	618
Wells Fargo	Lake Mary	Financial Services	571
Del-Air Heating and Air Conditioning	Sanford	Service	550
Hancock Information Group	Longwood	Marketing	514
Wharton Smith	Sanford	Construction	512
Wiginton Corporation	Longwood	Service	491
Hartford Insurance Group	Lake Mary	Insurance	488

Data Source: Seminole Chamber of Commerce

Employment Status by Disability

In addition to overcoming fair housing barriers such as housing discrimination and difficulty in finding accessible units, people with disabilities face financial hardships at higher rates than the County's general population. Residents with a disability have higher poverty rates and are less likely to be employed or in the labor force.

In Seminole County, there are 289,059 people of working age. Of the total workers in Seminole County, 22,770 (8%) have a disability. People with disabilities are disproportionately more likely, to be unemployed and looking for a job, or completely out of the workforce.

Table 19: Labor Force and Disability		
Labor Force and Disability	#	%
Total Working Population	289,059	NA
Total with a Disability	22,770	8%
Total People in Labor Force	225,334	92%
Employed:	213,175	95%
With a disability	8,602	4%
No disability	204,573	96%
Unemployed:	12,159	
With a disability	1,401	12%
No disability	10,758	88%
Not in labor force:	63,725	
With a disability	12,767	20%
No disability	50,958	80%

Data Source: Table C18120, 2018 ACS 5-Year Estimates

Job Proximity Index

The HUD job proximity index measures the number of jobs accessible to the number of people in an area to create a percentage index. Specifically, the jobs proximity index quantifies the accessibility of a given residential neighborhood as a function of its distance to all job locations within a Core Based Statistical Area (CBSA). Higher job proximity values represent better access to jobs.

The Job Proximity Index in Seminole County has little correlation with race, with the scores from all races within 4.1% from each other. White residents live the farthest from jobs, (44.1%) while black residents live closest (48.2%).

Table 20: Job Proximity Index by Race/Ethnicity				
White	Black	Hispanic	Asian	Native American
44.1	48.2	46.1	47.7	45.7

Data Source: HUD AFFHT004 Index

The highest concentration of jobs is in the north of the county, around Sanford, and in Census tracts just off I-4.

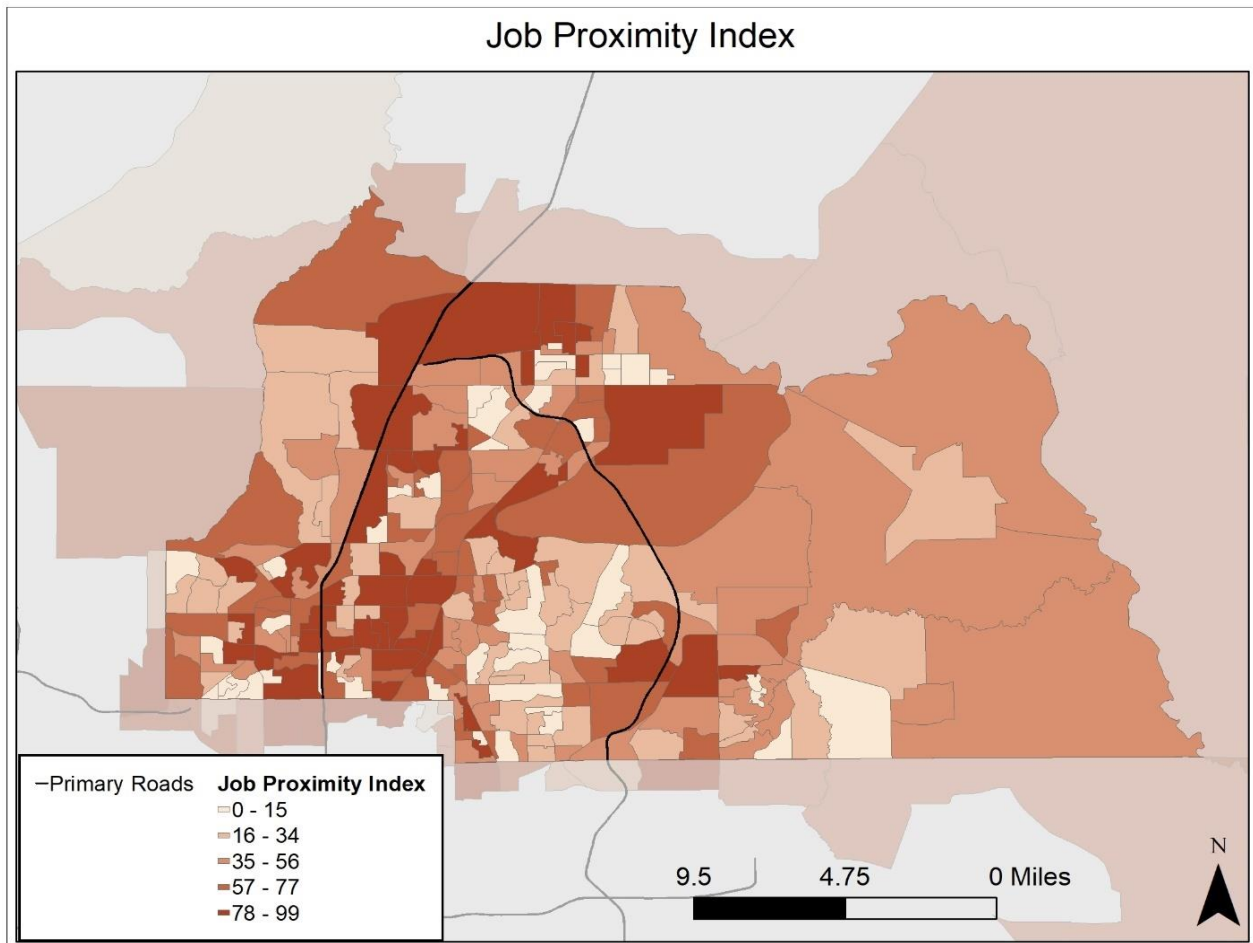


Figure 9: Job Proximity
Data Source: HUD Job Proximity Index

The Work Area Profile Report map displays the Longitudinal Employer-Household Dynamics program from the Center for Economic Studies at the U.S. Census Bureau. The program creates statistics on employment, earnings, and job flows at detailed levels of geography and industry and for different demographic groups. On the map, jobs per square mile are indicated by color. Lighter blue indicates lower number of jobs per square mile and darker blue indicates higher number of jobs per square mile. In addition, the map indicates the actual job count by census tract by displaying smaller circles where there are fewer jobs and larger circles where there are a higher number of jobs.

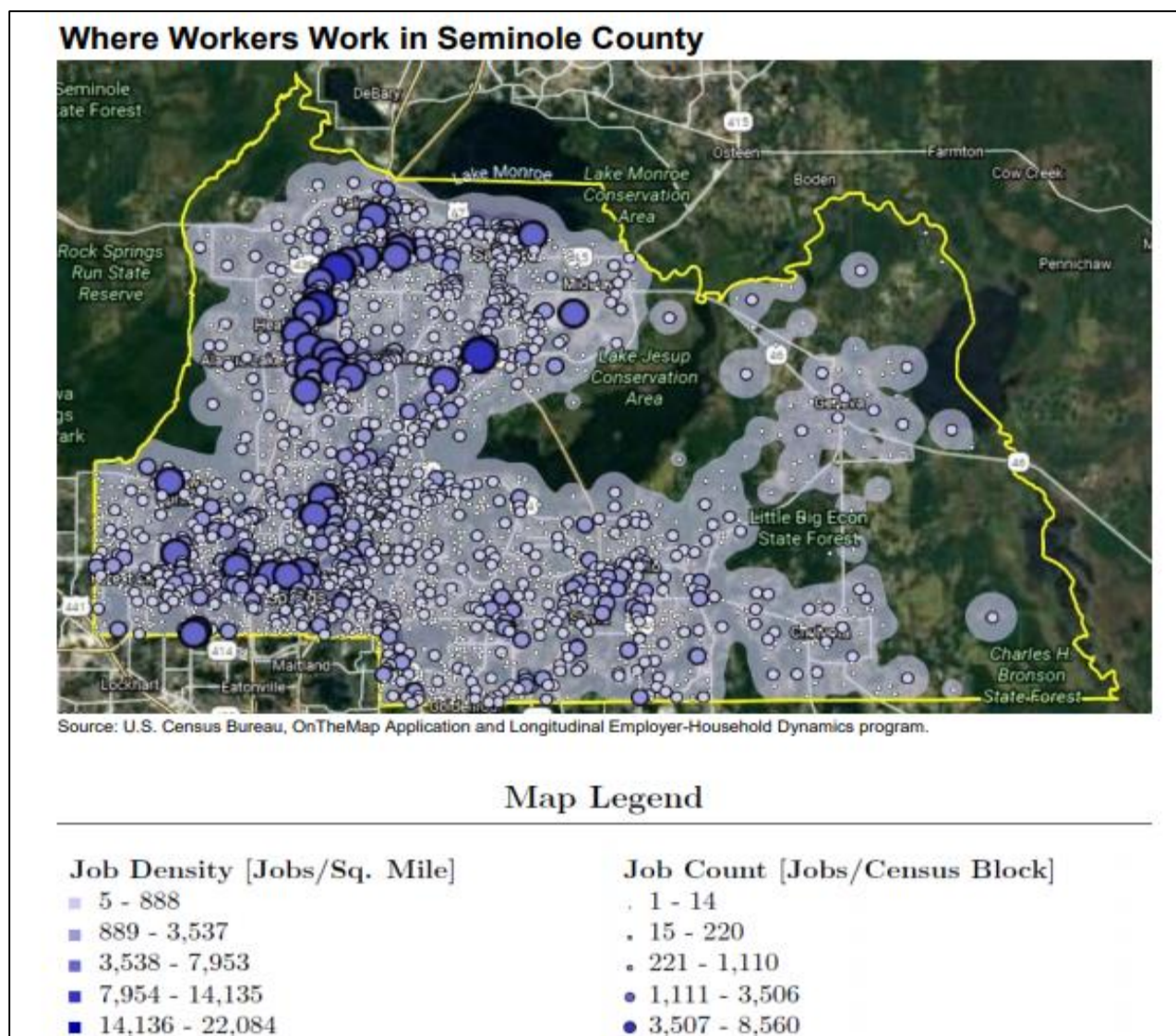


Figure 10. Concentration of Jobs

Data Source: Florida Department of Economic Opportunity Labor Shed report, 2019.

Labor Market Engagement Index

The Labor Market Engagement (LME) index measures labor force participation, employment, and education in an area to tell where engaged workers live. A higher value indicates higher level of labor engagement.

Unlike job proximity, labor market engagement varies dramatically by race. The Labor Market Engagement Index for black or African American residents is 46.15%, 17% lower than the Asian residents (63.15%) and 12.93% lower than white residents (59.08%). Because the black labor force participation rate was close to these groups, this disparity points to higher unemployment and lower levels of educational attainment for black residents.

Table 21: Labor Market Engagement Index by Race/Ethnicity				
White	Black	Hispanic	Asian	Native American
59.08	46.15	54.98	63.15	51.07

Data Source: HUD AFFHT004 Index

The Labor Market Engagement Index ranges from extremely high (dark purple) to very low (light purple). Labor market engagement is extremely low in the area around Sanford, and much higher in the less dense neighborhoods west of I-4 and in the center/south of the county.

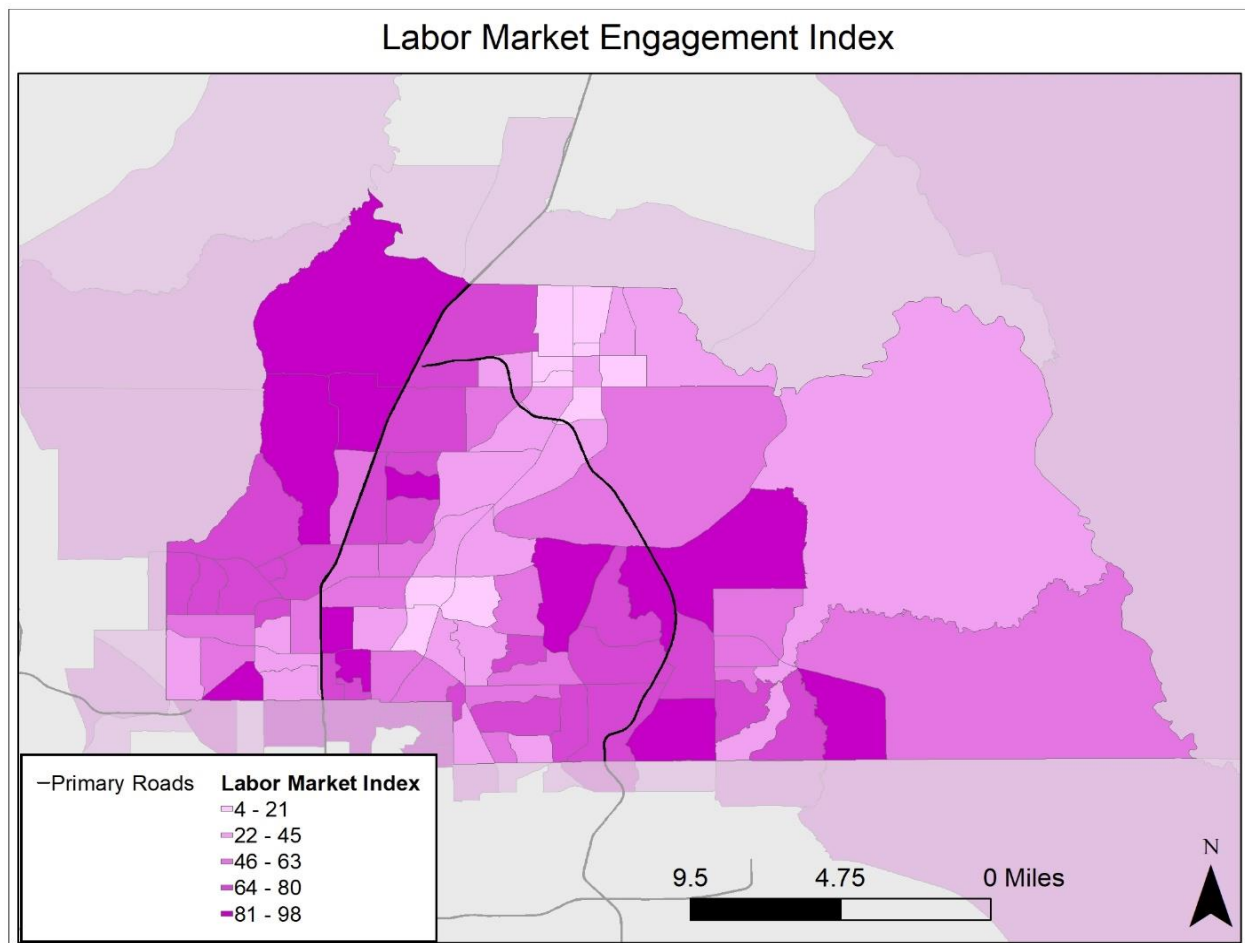


Figure 11: Labor Market Engagement
Data Source: HUD Labor Market Engagement Index

Education

Educational attainment is a principal factor in securing long-term employment and earning a livable wage. The degree to which a person can attain a high school diploma, bachelor's, or graduate degree, depends on social, cultural, systemic, and economic factors, many of which are beyond the direct control of local government. A primary means by which a family can grant access to a quality education is by renting or owning a home in a high-quality public-school district. Thus, there is a definite nexus between the housing market, including the availability and affordability of housing, educational attainment, and employment. A local government interested in advancing educational opportunity and economic self-sufficiency for all its residents should consider tools or mechanisms it can deploy to increase the supply of affordable housing units in high quality school districts.

School quality in Seminole County is high, with nearly half of all schools scoring an A in 2019. There were no schools ranked at the D level. While Schools with a higher number of disadvantaged students or classified as "Title 1" schools (because of their high number of low incomes families, are eligible for Title 1 Funds to operate special programming) are more likely to fall into the B or C ranking, several schools with a high number of disadvantaged students are A ranked. Lake Mary Elementary, Longwood Elementary, Sanford Middle School, Casselberry Elementary School, Stenstrom Elementary School, Indian Trails Middle School, and Crystal Lake Elementary School all have more than 40% of their students classified as disadvantaged while still achieving the A ranking in 2019. This is a testament to the hard work of Seminole County schools to deliver quality instruction to students in Seminole County. Table 2 reflects the 2019 Grades and Characteristics for Seminole County Schools.

Table 2: School Grades and Characteristics			
School Name	2019 Grade	% Minority Students	% Economically Disadvantaged Students
LAKE MARY ELEMENTARY SCHOOL	A	45.5	49.2
LONGWOOD ELEMENTARY SCHOOL	A	49.9	63.9
EVANS ELEMENTARY SCHOOL	A	49.7	38.1
LAWTON ELEMENTARY SCHOOL	A	28.2	25.3
SANFORD MIDDLE SCHOOL	A	63.6	50.6
WALKER ELEMENTARY SCHOOL	A	29.3	22.5
CASSELBERRY ELEMENTARY SCHOOL	A	53.6	72.8
WILSON ELEMENTARY SCHOOL	A	43.5	27.9
CROOMS ACADEMY OF INFORMATION TECHNOLOGY	A	43.9	38.2
JACKSON HEIGHTS MIDDLE SCHOOL	A	40.3	31.5
RAINBOW ELEMENTARY SCHOOL	A	41.1	35
OVIEDO HIGH SCHOOL	A	36.2	34.1
CARILLON ELEMENTARY SCHOOL	A	40	29.1
SABAL POINT ELEMENTARY SCHOOL	A	40.3	34
WOODLANDS ELEMENTARY SCHOOL	A	33.5	32.5
ROCK LAKE MIDDLE SCHOOL	A	37.3	39.5
WEKIVA ELEMENTARY SCHOOL	A	34	34.1
KEETH ELEMENTARY SCHOOL	A	31.9	31.6
STENSTROM ELEMENTARY SCHOOL	A	48.7	43.4
HEATHROW ELEMENTARY SCHOOL	A	50.8	19.3
PARTIN ELEMENTARY SCHOOL	A	38.9	23.2
INDIAN TRAILS MIDDLE SCHOOL	A	38.3	41.1
CHILES MIDDLE SCHOOL	A	30.3	26.5
CRYSTAL LAKE ELEMENTARY SCHOOL	A	51.6	42.7
HAGERTY HIGH SCHOOL	A	32.4	20.7
SEMINOLE COUNTY VIRTUAL FRANCHISE (SCVS)	A	47.5	19.5
CHOICES IN LEARNING CHARTER	A	45.7	22
GALILEO SCHOOL FOR GIFTED LEARNING	A	39.2	27.5
SEMINOLE SCIENCE CHARTER SCHOOL	A	62.6	29.7
BEAR LAKE ELEMENTARY SCHOOL	B	51.9	55.4
GENEVA ELEMENTARY SCHOOL	B	19	47.2
LAKE MARY HIGH SCHOOL	B	44.3	42.6
MILWEE MIDDLE SCHOOL	B	57.1	66.4
LAYER ELEMENTARY SCHOOL	B	52.5	57.4
SEMINOLE HIGH SCHOOL	B	64	53.3
SOUTH SEMINOLE MIDDLE SCHOOL	B	59.8	67.5
GOLDSBORO ELEMENTARY MAGNET	B	72.7	51.5
HIGHLANDS ELEMENTARY SCHOOL	B	48.5	62.6
LYMAN HIGH SCHOOL	B	49.9	53.5
LAKE BRANTLEY HIGH SCHOOL	B	49.1	45.7

TEAGUE MIDDLE SCHOOL	B	54.3	58
RED BUG ELEMENTARY SCHOOL	B	45.7	48.7
TUSKAWILLA MIDDLE SCHOOL	B	49.4	52.1
LAKE HOWELL HIGH SCHOOL	B	51.2	53.6
LAKE ORIENTA ELEMENTARY SCHOOL	B	72.5	75
STERLING PARK ELEMENTARY SCHOOL	B	52.8	56
GREENWOOD LAKES MIDDLE SCHOOL	B	56.2	66.7
MARKHAM WOODS MIDDLE SCHOOL	B	54.6	46.5
BENTLEY ELEMENTARY SCHOOL	B	70.7	63.2
WICKLOW ELEMENTARY SCHOOL	B	79.2	88.5
WINTER SPRINGS HIGH SCHOOL	B	46.6	52.8
HAMILTON ELEMENTARY SCHOOL	C	80.3	90
ENGLISH ESTATES ELEMENTARY SCHOOL	C	70.4	76.3
PINE CREST ELEMENTARY SCHOOL	C	78.3	94.9
MILLENNIUM MIDDLE SCHOOL	C	68.4	68.1
MIDWAY ELEMENTARY SCHOOL	C	85.4	86.2
WINTER SPRINGS ELEMENTARY SCHOOL	C	54.9	75.5
SPRING LAKE ELEMENTARY SCHOOL	C	76	80.2
FOREST CITY ELEMENTARY SCHOOL	C	67.1	70.9
IDYLLWILDE ELEMENTARY SCHOOL	C	78.5	85.3
EASTBROOK ELEMENTARY SCHOOL	C	55.7	60.8
ALTAMONTE ELEMENTARY SCHOOL	C	65.2	76.1

Data Source: Florida Department of Education School Grades

School data is beneficial because it provides insight on where childcare assistance, mentoring and tutoring programs are needed most in Seminole County.

Seminole County educational system fairs better than many others nationally. Seminole County's residents have a higher level of educational attainment as well. 38.2% of residents have a bachelor's degree, compared to 31.5% in the rest of the county. 94.3% of Seminole County's residents have at least a high school diploma.

Table 23: Educational Attainment		
Population 25 years and over	318,981	---
Less than 9th grade	6,266	2.0%
9th to 12th grade, no diploma	11,941	3.7%
High school graduate (includes equivalency)	69,293	21.7%
Some college, no degree	63,852	20.0%
Associate degree	45,621	14.3%
Bachelor's degree	81,835	25.7%
Graduate or professional degree	40,173	12.6%
High school graduate or higher	300,774	94.3%
Bachelor's degree or higher	122,008	38.2%

Data Source: Table S1501, 2018 ACS 5-Year Estimates

However, educational attainment varies by race. The Asian college graduation rate (58.8%) is more than double Black or African American (26.5%) and Latino (28.4%) with white graduation rates (41.4%) closer to the county average.

Table 24: Educational Attainment by Race/Ethnicity		
White alone, not Hispanic or Latino	206,906	(X)
High school graduate or higher	198,868	96.1
Bachelor's degree or higher	85,694	41.4
Black alone	34,732	(X)
High school graduate or higher	31,319	90.2
Bachelor's degree or higher	9,200	26.5
American Indian or Alaska Native alone	744	(X)
High school graduate or higher	662	89
Bachelor's degree or higher	321	43.1
Asian alone	13,737	(X)
High school graduate or higher	12,631	91.9
Bachelor's degree or higher	8,081	58.8
Native Hawaiian and Other Pacific Islander alone	202	(X)
High school graduate or higher	163	80.7
Bachelor's degree or higher	52	25.7
Some other race alone	9,177	(X)
High school graduate or higher	8,021	87.4
Bachelor's degree or higher	2,359	25.7
Two or more races	6,484	(X)
High school graduate or higher	6,099	94.1
Bachelor's degree or higher	2,416	37.3
Hispanic or Latino Origin	59,896	(X)
High school graduate or higher	54,477	91
Bachelor's degree or higher	16,983	28.4

Data Source: Table S1501, 2018 ACS 5-Year Estimates

The HUD School Proficiency Index uses school level data on 4th grade student state exam scores to pinpoint which neighborhoods have access to high performing schools.

While most schools in Seminole County perform well, there are clear racial differences when it comes to being able to access a school where students perform well on state standardized tests. Black households score 12.39% lower than the next lowest racial or ethnic group (Hispanics), 14.6% lower than white households, and over 20% lower than Asian and Native American households.

Table 25: School Proficiency Index by Race/Ethnicity				
White	Black	Hispanic	Asian	Native American
64.48	49.88	62.27	69.53	70.32

Data Source: HUD AFFHT004 Index

The following map shows that educational proficiency has a strong geographic component, with far higher educational proficiency in the wealthier areas in the western and southern portions of the county, while the area around Sanford and Altamont Springs score dramatically lower.

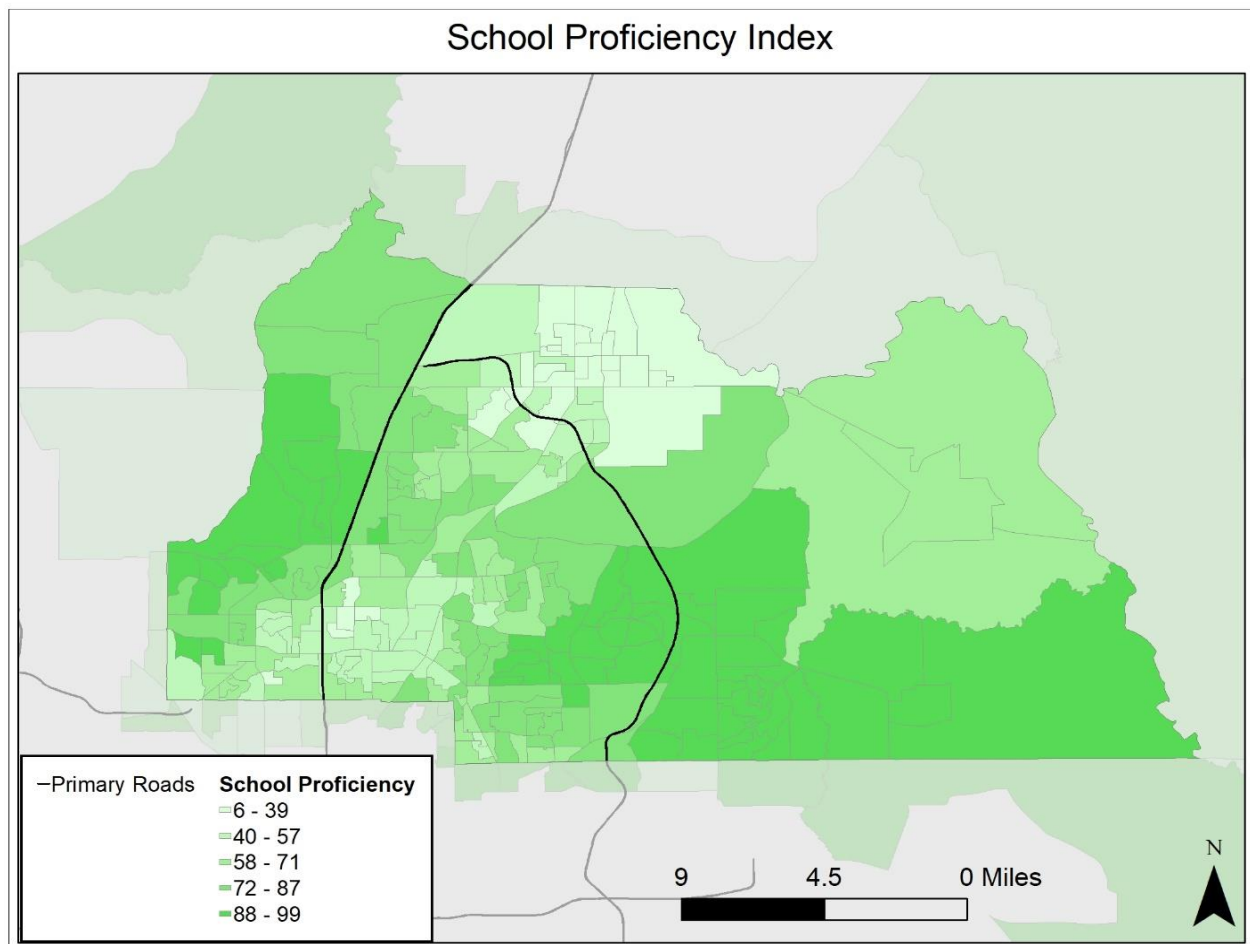


Figure 12: School Proficiency

Data Source: HUD School Proficiency Index

Transportation

Just as there is a relationship between housing location, employment, and access to quality education, there is also a relationship between housing location and transportation. Housing that is disconnected from public transportation naturally discourages public transportation use. After housing, transportation

is the second-largest household expense for the average household, so in any conversation about housing affordability, it is helpful to examine the cost implications of transportation. As it becomes more difficult to afford housing, many people are forced to move further and further away from where jobs are and “over-commute” by driving long distances to and from work. In many areas, high transportation costs often negate relatively more-affordable housing prices. Further, as households seek affordable housing further from job centers, they must devote burdensome time in every working day to commuting from their home to their place of employment. Besides adding to overall household costs, long commutes damage health, increase the overall rate of accidents, and put pressure on public road infrastructure.

89.4% of commuters used a car, truck, or van to get to work, 7.8% of whom carpooled. Very few residents used public transportation (.9%) bicycling (.2%) or walking (1%) to get to work, though 7.3% of residents worked from home. Alternative transportation options both save money and are extremely important for residents with disabilities and the elderly who may not be able to drive.

Table 26: Commute Mode by Count and Share of Commuter Population		
Means of Transportation	# of Workers	% of Workers
Total Commuters	224,221	---
Car, truck, or van	200,381	89.4
Drove alone	182,828	81.5
Carpooled	17,553	7.8
Public transportation	1,997	0.9
Taxicab	293	0.1
Motorcycle	324	0.1
Bicycle	513	0.2
Walked	2,178	1.0
Other means	2,107	0.9
Worked at home	16,428	7.3

Data Source: Table B08301, 2018 ACS 5-Year Estimates

Low Transportation Cost Index

The Low Transportation Cost Index measures the cost of transportation and proximity to public transportation. Specifically, the index is based on estimates of transportation costs for a 3-person family with income at 50% of the median income for renters for the region. Values are inverted and percentile ranked nationally, with values ranging from 0 to 100. The higher the value, the lower the cost of transportation in the neighborhood.

Transportation costs across Seminole County are high, so the Low Transportation Cost Index is low for all racial groups. There are not meaningful variations by race along this index, with the lowest group (Asians) with less than a 6% from the highest group (Hispanics).

Table 27: Low Transportation Cost Index Values by Race/Ethnicity				
White	Black	Hispanic	Asian	Native
36.68	40.94	41.47	35.74	40.07

Data Source: HUD AFFHT004 Index

Geographically, access to low-cost transportation is rare in Seminole County. In the southern portion of the County (in and around Altamonte Springs) and in Sanford transportation costs are lower and the index is higher.

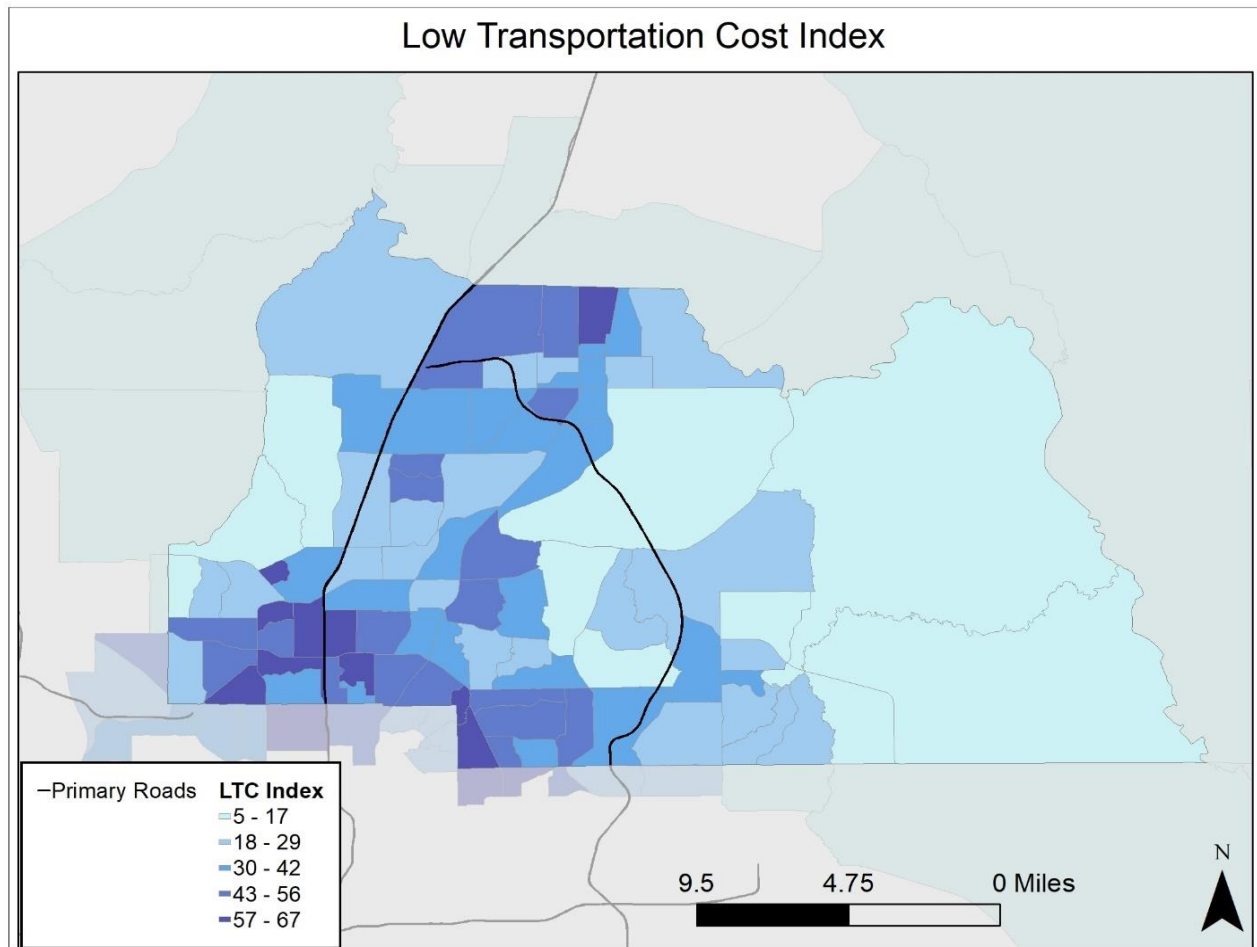


Figure 13: Low Transportation Cost Index
Data Source: HUD Low Transportation Cost Index

Housing + Transportation Index

The Housing + Transportation (H+T) Index is a measurement created by the Center for Neighborhood Technology to chart the way that housing costs and transportation costs together affect the ability for families to afford to live places. For a family at AMI, families should be paying no more than 45% of their income towards combined housing plus transportation.

Unfortunately, in Seminole County, only those areas with the lowest H+T Index are affordable (the median housing and transportation costs add up to less than 45%) of the County's area median income (AMI). In most of the County, median housing plus transportation costs far more than 45%. In the green areas (around Sanford, Altamonte Springs, and in the south of the County in between I-4 and 417) households pay at least 50% of their income towards these two large expenses. In the red area to the west of the county, households pay between 82% and 112% of the County's AMI.

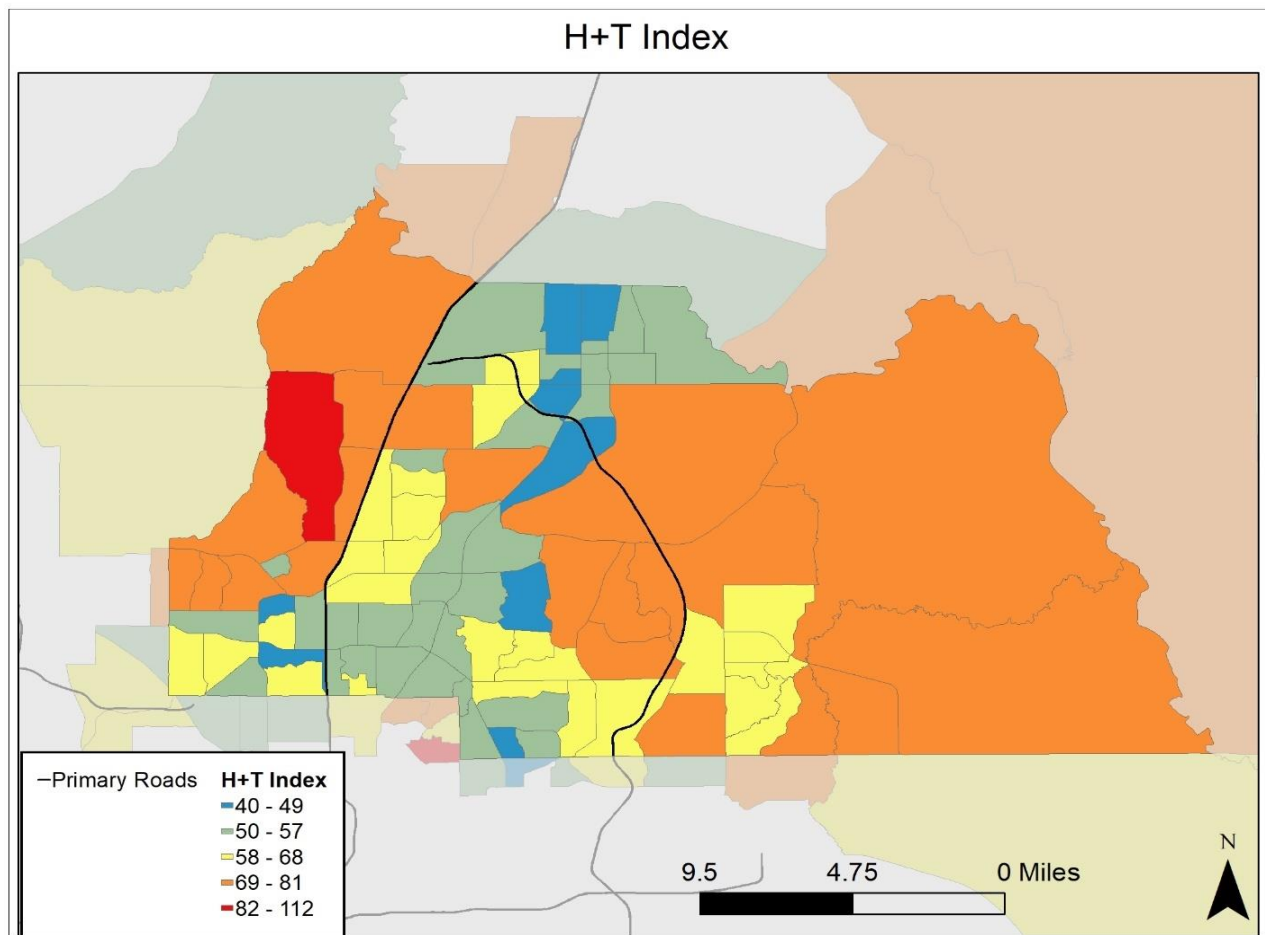


Figure 14: H+T Index

Source: CNT

Housing Profile

The section below details information on the types and cost of housing in Seminole County. It provides a general overview of the number of owners vs. renters, vacancy rates, types of housing available, age, and condition of housing. It examines to housing affordability, comparing housing costs to wages to show the need for affordable housing.

Tenure, Vacancy, Type, Age, and Condition

High vacancy rates may indicate oversupply in the market or a mismatch between the types of units that have been built and the needs of Seminole County residents. Housing tenure (whether someone is a renter or owner) is also an important data point to understand housing access. Renters tend to pay more for housing while making less and are more likely to face housing discrimination, by a landlord or property management company. Seminole County has a high percentage of homeowners, over 65%.

Table 28: Housing Tenure		
	#	%
Occupied housing units	167,304	---
Owner-occupied	109,069	65.2
Renter-occupied	58,235	34.8

Data Source: Table DP04, 2018 ACS Five-Year Estimates

Rental units are far more likely to be vacant than homeowner units. The homeowner vacancy rates for both homeowner and rental units in Seminole County are higher than the national average.

Table 29: Vacant Housing Units by Tenure	
Vacant housing units	21,225
Homeowner vacancy rate	2.2%
Rental vacancy rate	9.8%

Data Source: Table DP04, 2018 ACS Five-Year Estimates

The chart below provides the total number of vacant housing units and describes the reason for vacancy.

Table 30: Vacant Units by Type	
Total:	21,225
For rent	6,373
Rented, not occupied	558
For sale only	2,448
Sold, not occupied	996
For seasonal, recreational, or occasional use	3,364
For migrant workers	0
Other vacant	7,486

Data Source: Table B25004, 2018 ACS Five-Year Estimates

In Seminole County, Single family detached homes (61.2%) are the most predominate housing type, followed by single family attached homes (town homes) 9.2%. Seminole County is lacking the “missing middle” housing, small apartments between two and 10 units. Approximately seven percent of the housing units in the County are apartment complexes with 20 or more units.

Table 31: Units by Type		
	#	%
Total housing units	188,529	
1-unit, detached	115,317	61.2
1-unit, attached	17,422	9.2
2 units	1,772	0.9
3 or 4 units	6,845	3.6
5 to 9 units	14,324	7.6
10 to 19 units	14,877	7.9
20 or more units	12,519	6.6
Mobile home	5,321	2.8
Boat, RV, van, etc.	132	0.1

Data Source: Table DP04, 2018 ACS Five-Year Estimates

Most of the neighborhoods of Seminole County are relatively new communities, with most homes in the county constructed since 1980. Between 2000 and 2015, only a third as many homes (22,790) were built as were built between 1980 and 1999 (67,667). A reduction in the production of homes can lead to rising home prices if supply does not meet demand.

Table 32: Age of Homes				
Year Unit Built	Owner-Occupied		Renter-Occupied	
	#	%	#	%
2000 or later	15,914	17%	6,876	17%
1980-1999	46,725	50%	20,942	52%
1950-1979	29,269	32%	12,250	30%
Before 1950	874	1%	403	1%
Total	92,782	100%	40,471	100%

Data Source: 2011-2015 CHAS Estimates

The table below gives an overview of housing problems in the County. 2015 CHAS data provides the numbers of households experiencing housing problems by income ranges (up to 100% AMI) and tenure status. All housing problems are typically experienced at disproportionate rates by the lowest income households in a jurisdiction. Large numbers of households living in overcrowded or substandard housing generally indicate a severe mismatch between supply and demand of affordable housing in a community.

Substandard housing and overcrowding are relatively rare in Seminole County. A much higher number (34,486) of households making at or below AMI are cost burdened (30% or more of household income going towards housing) or severely cost burdened (50% or more of household income going towards housing).

Table 33: Housing Problems by Tenure										
	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	74	60	99	85	318	30	49	55	20	154
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	70	0	0	114	184	0	35	10	4	49
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	125	50	144	80	399	45	43	23	115	226
Housing cost burden greater than 50% of	3,335	3,745	1,550	209	8,839	3,750	2,875	2,845	1,044	10,514

income (and none of the above problems)										
Housing cost burden greater than 30% of income (and none of the above problems)	25	1,054	4,695	1,710	7,484	365	1,200	3,640	2,444	7,649
Zero/negative Income (and none of the above problems)	1,214	0	0	0	1,214	790	0	0	0	790

Data Source: 2011-2015 CHAS Estimates

Within Seminole County, much of the housing stock was built after 1980, with 68% of owner-occupied housing and 69% of renter-occupied housing built in this period. The least amount of housing stock was built before 1950 and is comprised of 1% of owner-occupied housing and 1% of renter-occupied housing. Housing built in the 1980 time-period are considered older units vulnerable to deterioration. There is a need for both owner-occupied, and renter occupied housing rehabilitation due to the age of a significant portion of the housing stock.

One key indicator of the condition of a community's housing stock focuses on the age of the housing. As older structures are more available and affordable to lower-income households, lower income households typically face higher rates of housing burdens without the resources to maintain the unit, mitigate deterioration, and invest in energy efficiency, or harden the home for disaster resilience.

Housing Costs

High housing costs limit where people can find housing, make them more vulnerable to discrimination, and reduce economic and racial integration.

Between 2010 and 2018, home values in Seminole County fell by 7%, While median contracted rent rose by 20%. When nationwide inflation is factored in, homes have fallen 26% while rents have remained steady, increasing by 1%.

Table 34: Housing Cost by Tenure			
	Base Year: 2010	Most Recent Year: 2018	% Change
Median Home Value	241,000	224,000	-7%
Median Contract Rent	869	1,039	20%

Data Source: Table DPO4, 2010 ACS 5-Year Estimates (Base Year), 2018 ACS 5-Year Estimates (Most Recent Year)

The Table below shows the values of owner-occupied homes. Most homes in Seminole County cost between \$150,000 and \$500,000, Approximately 14% of homes are valued under \$100,000 The limited number of units in the lower price ranges make housing difficult for lower income households to afford.

Table 35: Owner Occupied Home Values		
	#	%
Owner-occupied units	109069	----
Less than \$50,000	4774	4.4
\$50,000 to \$99,999	10852	9.9
\$100,000 to \$149,999	13116	12
\$150,000 to \$199,999	18154	16.6
\$200,000 to \$299,999	30179	27.7
\$300,000 to \$499,999	24056	22.1
\$500,000 to \$999,999	6809	6.2
\$1,000,000 or more	1129	1
Median (dollars)	224000	----

Data Source: Table DP04, 2018 ACS Five-Year Estimates

Over 85% of households in Seminole County paid between \$500 and \$1,500 in rent in 2018, with few households paying less than \$500 (2.9%). Approximately 11.9% of households paid \$1,500 or more in rent for their home.

Table 36: Contract Rent Paid		
	#	%
Total	56,137	100.00%
Less than \$500	1,679	2.9%
\$500-999	24,095	42.9%
\$1,000-1,499	23,723	42.3%
\$1,500-1,999	4,856	8.7%
\$2,000 or more	1,784	3.2%

Data Source: Table DP04, 2018 ACS 5-Year Estimates

The HUD Area Median Family Income estimates describe the total number of homes available to households making below or at the area median income. According to HUD, there were 16,759 renter homes affordable to renter family households making below 80% AMI, and 44,062 homes affordable for homeowner family households making 100% or below the area median income. This indicates there are not enough affordable housing units available to accommodate the housing needs in Seminole County.

Table 37: Count of Units by Tenure Affordable to Household Income Groups		
% Units affordable to Households earning	Renter	Owner
Total	16,759	44,062
30% HAMFI	569	No Data
50% HAMFI	1,877	4,790
80% HAMFI	14,313	15,248
100% HAMFI	No Data	24,024

Data Source: 2011-2015 CHAS Estimates

Monthly rent depends on the size of the home. An efficiency (studio or no-bedroom unit) in Seminole County cost \$932 a month, only \$72 less than a 1 bedroom. The fair market rent for a two bedroom is \$1,190. The larger unit rents are over \$1,500 per month.

Table 38: Count of Units by Size and Estimated Monthly Rent					
Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	932	1,004	1,190	1,576	1,879
High HOME Rent	770	826	993	1,139	1,251
Low HOME Rent	607	651	781	902	1,007

Data Source: HUD FMR and HOME Rents

Renters are not spread evenly across Seminole County. They tend to be concentrated in lower income areas around Altamonte Springs and Sanford.

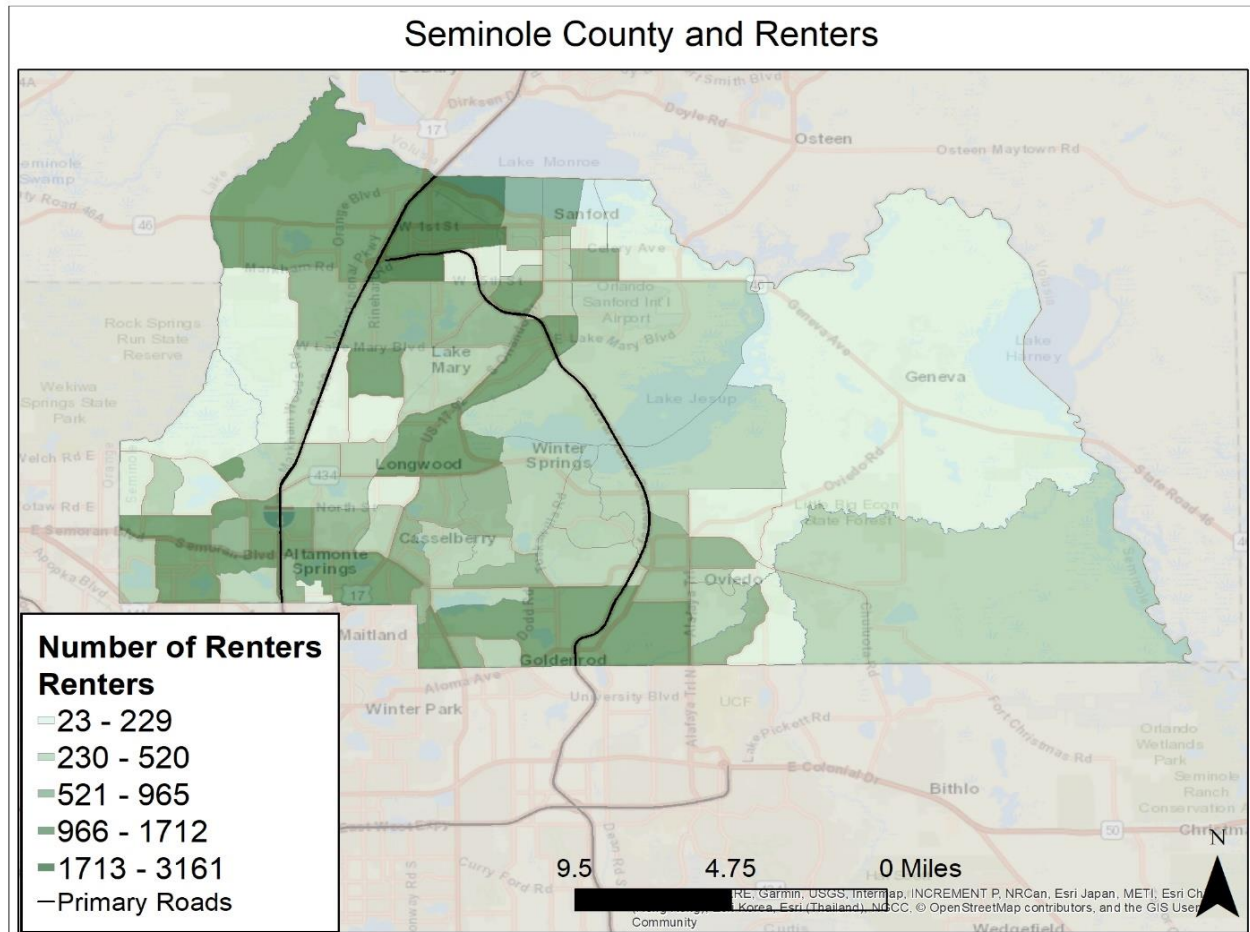


Figure 15: Number of Renters by Census Tract
Source: 2018 ACS 5 Year Estimates DP04

A household is considered cost burdened if it pays more than 30% of its gross monthly income for housing. A household is considered severely cost burdened if it pays 50% or more of its gross monthly income for housing. An examination of housing cost burden is important because cost-burdened households may have difficulty affording other necessities such as food, childcare, health care, and transportation. The cost burden calculation for housing costs for a homeowner includes mortgage payments, property taxes, property insurance, homeowner association fees (if any) and utilities. Small, related households represent the largest share of cost burdened, low-income households, while elderly households represent the most common cost burdened, low-income homeowner.

Table 39: Income and Cost Burden by Household Type								
	Renter				Owner			
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	1,320	1,859	2,785	5,964	1,064	1,023	2,599	4,686
Large Related	110	329	309	748	240	222	258	720
Elderly	773	1,101	1,124	2,998	1,527	2,278	2,473	6,278
Other	1,419	1,565	2,166	5,150	1,304	614	1,173	3,091
Total need by income	3,622	4,854	6,384	14,860	4,135	4,137	6,503	14,775

Data Source: 2011-2015 CHAS Estimates

The following table presents severe cost burden by tenure and income. Households that are severely cost burdened pay more than 50% of their income towards housing. When a low-income household pays more than 50% of their income towards housing, it is extraordinarily difficult to afford necessities and impossible to save for an emergency. As with cost burden at 30% of household income, small, related households are the largest share of renters severely cost burdened, where the largest share of homeowners paying more than 50% of their income towards housing are the elderly.

Table 40: Severely Cost Burdened Households								
	Renter				Owner			
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	1,310	1,445	495	3,250	1,015	704	1,089	2,808
Large Related	110	210	34	354	230	167	110	507
Elderly	773	952	362	2,087	1,304	1,545	1,024	3,873
Other	1,404	1,175	698	3,277	1,220	484	625	2,329
Total need by income	3,597	3,782	1,589	8,968	3,769	2,900	2,848	9,517

Data Source: 2011-2015 CHAS Estimates

The National Low-Income Housing Coalition creates a yearly “Out of Reach” report that provides the hourly wage necessary to afford various types of units across the country. The chart below provides the hourly incomes needed to afford for zero through four-bedroom homes in Seminole County. An individual would need to make \$24.00 per hour to afford a two-bedroom unit in Seminole County without becoming cost burdened.

Table 41: Livable Housing Wage Estimates by Bedroom Count	
Zero Bedroom	\$19.02
One Bedroom	\$20.46
Two Bedroom	\$24.00
Three Bedroom	\$31.46
Four Bedroom	\$37.62

Data Source: National Low-Income Housing Coalition, Out of Reach 2019

Another measurement of areas of special need is “percent low- and moderate-income persons.” This data calculated by the Department of Housing and Urban Development and most commonly referred to as “Low-Mod” is helpful for understanding what percentage of a jurisdiction low or moderate income is and is helpful for visualizing where in a jurisdiction low- and moderate-income people live.

Table 42: Low-Mod Population Estimates			
	Low Income	Low-Mod Income	Low-Mod %
Seminole County	79,220	143,535	33.12%

Data Source: HUD 2011-2015 Low-Mod estimates, made available 2020.

For this analysis, an area of low-income concentration is any census tract where the median household income (MHI) for the tract is 80% or less than the MHI for the County. This is the low-income standard used for several federal and state housing/ community development programs. According to the 2018 ACS data, the MHI in the County was \$63,760. A tract is considered to have a low-income concentration if the MHI is \$51,008 or less. There are several census tracts throughout Seminole County that meet this definition in areas including Sanford, Altamonte Springs, Casselberry, Longwood, and unincorporated areas of the County. There is a strong overlap between the areas of low-income concentration and the areas of minority concentration. In addition, census tract 221.01, the tract identified above as having multiple housing problems, is also an area of low-income concentration. For CDBG eligibility, an area must have a low-income percentage of 51% or higher.

Low Mod Census Tracts

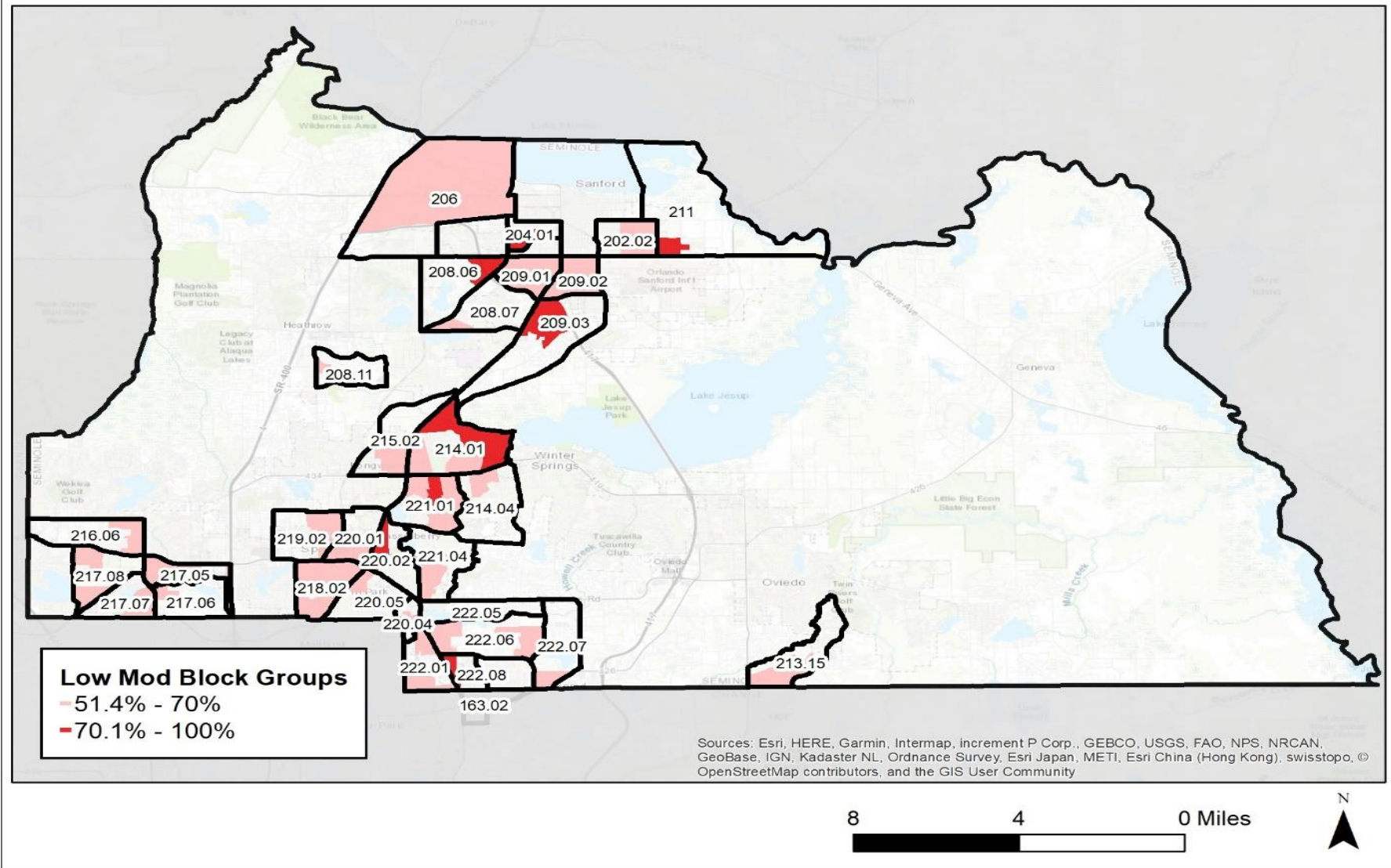


Figure 16: Low-Mod Census Tracts

Data Source: HUD 2011 – 2015 Low-Mod Census Tracts, made available 2020

Publicly Supported Housing

As of March 2020, there were a total of 1,343 applicants on SCHAs waiting lists: 331 public housing applicants and 1,012 Section 8 HCV applicants. This included 153 elderly households and 293 disabled households. Black/African Americans were the racial or ethnic group most in need of public housing representing approximately 57% (771 applicants) of all applicants on the waiting lists. Both the public housing list and Section 8 HCV waiting lists are closed. For families on the waiting list, the most immediate need is access to affordable rental housing. Additionally, public housing residents and applicants generally have a need for supportive services such as job training, affordable childcare, and financial and homeownership counseling. A typical resident in public housing has an annual income of approximately \$14,000 per year. The Housing Authority assists vulnerable groups with limited means.

Table 43: Publicly Supported Housing Totals in Use									
Program Type									
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	0	30	334	0	334	39	0	30

Data Source: PIH Information Center

The following chart provides program information on people staying in the public housing, including average annual income, elderly populations, number of persons with a disability, etc.

The average annual income for public housing units in Seminole County is low, with the average household in public housing making \$14,029 and the average household receiving a voucher making less, at \$13,326. Only one person receiving a voucher was formerly homeless, though a significant portion of the 608 households were elderly or had a disability. The Housing Authority coordinates with an area domestic violence Shelter to house survivors of domestic violence. At the time of the report, Seminole County Community Services was not tracking Housing Authority residents coming from the domestic violence shelter.

Table 44: Publicly Supported Housing Resident Characteristics								
Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers				
				Total	Project - based	Tenant -based	Special Purpose Voucher	
							Veterans Affairs Supportive Housing	Family Unification Program
Average Annual Income	0	0	14,029	13,326	0	13,223	15,441	0
Average length of stay	0	0	6	6	0	6	0	0
Average Household size	0	0	3	2	0	2	1	0
# Homeless at admission	0	0	0	1	0	0	1	0
# of Elderly Program Participants (>62)	0	0	5	116	0	116	0	0
# of Disabled Families	0	0	8	151	0	148	3	0
# of Families requesting accessibility features	0	0	30	608	0	600	4	0
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

Data Source: PIH Information Center

The PIH Information Center also tracks the race of program participants. While a relatively small minority within Seminole County, the majority of voucher holders in the County are Black/African-American, including three of the four veterans receiving Veterans Affairs Supportive Housing. Just under half of voucher holders are white.

Table 45: Publicly Supported Housing Race Characteristics									
Program Type									
Race	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	0	15	295	0	294	1	0	0
Black/African American	0	0	15	311	0	304	3	0	0
Asian	0	0	0	1	0	1	0	0	0
American Indian/Alaska Native	0	0	0	0	0	0	0	0	0
Pacific Islander	0	0	0	1	0	1	0	0	0
Other	0	0	0	0	0	0	0	0	0

Data Source: PIH Information Center

While just over 20% of Seminole County's residents are Hispanic or Latinx, just over a third of public housing residents are Hispanic or Latinx.

Table 46: Publicly Supported Housing Ethnicity Characteristics									
Program Type									
Ethnicity	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	0	8	210	0	210	0	0	0
Not Hispanic	0	0	22	398	0	390	4	0	0

Data Source: PIH Information Center

Affordable housing units should be spread across an area to reduce economic and racial segregation and give lower income people access to high quality schools and job opportunities.

Public Housing in Seminole County is scattered throughout major population centers, mostly characterized by privately built Low Income Housing Tax Credit Developments (LIHTC). Voucher use is concentrated in the area around Sanford.

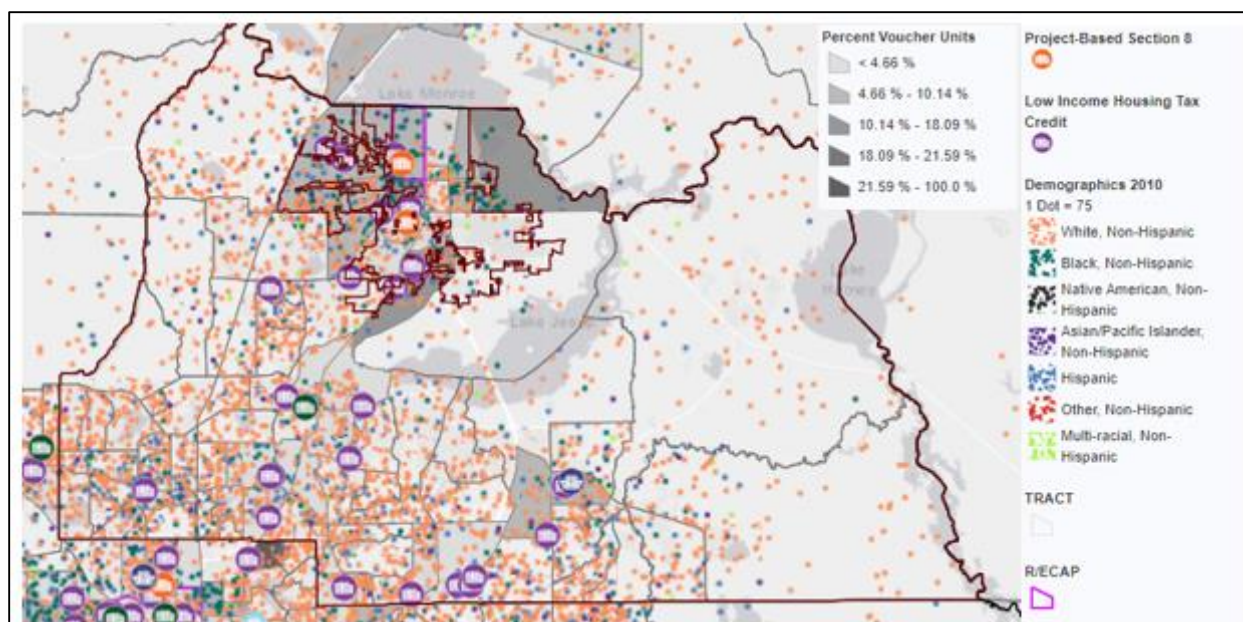


Figure 17: Race and Ethnicity and Public Housing
Source: AFFH Mapping Tool, AFFHT006, 2020 Map 5

Homeownership

Homeownership is a long-term goal for many people. For most Americans, their home is their largest single purchase and source of equity. Unfortunately, Blacks/African Americans in particular, and minority populations generally, have historically been barred or discouraged from owning a home. This reduces the equity that minority families can build and reduces the wealth passed down generationally, as well as reducing housing stability.

Black and white homeownership are slightly higher than the black and white portions of the population, while Latinos and Asians are slightly underrepresented.

Table 47: Homeownership by Race/Ethnicity		
	#	%
Black or African American	20988	11.6
American Indian and Alaska Native	449	0.2
Asian	7416	4.1
Native Hawaiian and Other Pacific Islander	175	0.1
Some other race	10821	6
Two or more races	2531	1.4
Hispanic or Latino origin	32474	17.9
White alone, not Hispanic or Latino	118369	65.3

Data Source: Table S2502, 2018 ACS Five-Year Estimates

Evaluation of Jurisdiction's Current Fair Housing Legal Status

This section provides information on Seminole County's current fair housing legal status including information about the number and type of fair housing complaints, the existence of fair housing discrimination suits filed by the U.S. Department of Justice, as well as a discussion of other fair housing concerns or problems.

The federal Fair Housing Act is administered and enforced by HUD's Department of Fair Housing and Equal Opportunity (FHEO) and the Department of Justice's Housing and Civil Enforcement Section. The FHEO also administers the Fair Housing Assistance Program (FHAP) and the Fair Housing Initiative Program (FHIP). These programs provide funding to states, local public agencies, and non-profit organizations to assist victims of housing discrimination and to promote awareness of fair housing laws.

In addition to the federal Fair Housing Act, the State of Florida has adopted a state fair housing law that is enforced by the Florida Commission on Human Relations (FCHR). Title XLIV, Chapter 760 of the Florida Statutes, "Civil Rights," covers discrimination in the treatment of persons and minority representation. Part II, the Florida Fair Housing Act, (ss. 760.20 – 760.37), prohibits discrimination in the sale, rental, advertising, financing, or provision of brokerage services for housing. The Florida Fair Housing Act is substantially equivalent to the federal Fair Housing Act and protects persons from housing discrimination on the bases of race, color, religion, national origin, sex, pregnancy, disability, and familial status. In 2000, the Florida Fair Housing Act (FFHA) was amended to include affordable housing as a protected class (Section 760.26, Florida Statutes).

In Seminole County and neighboring region there are three main agencies that enforce fair housing laws and/or provide fair housing outreach and education services. The agencies are: 1) the Florida Commission on Human Relations (FCHR), 2) Community Legal Services of Mid Florida (CLSMF), and 3) the Seminole County Bar Association Legal Aid Society (SCBALAS).

FCHR is a FHAP agency that supports a variety of fair housing administrative and enforcement activities, including complaint investigation, conciliation, administrative and/or judicial enforcement, training, education, and outreach.

CLSMF is one of seven legal organizations in Florida funded primarily by the Legal Services Corporation, a private non-profit corporation created by Congress to ensure low-income people have equal access to the judicial system.

The SCBALAS provides legal assistance and advice to renters on a wide range of issues, including landlord-tenant disputes, unlawful detainers, ejectments, and more. These services are typically provided free of charge, thus helping Seminole County's low-income families, veterans, seniors, and other vulnerable members stay in their homes and avoid homelessness.

Fair Housing Complaints or Compliance Reviews

A review of fair housing complaint data helps identify trends in housing discrimination in the County to inform specific fair housing actions that may be needed. As summarized in the table below, between 2015 and 2020, 56 fair housing cases (about 11 cases per year) were filed in the County based on statistics provided by HUD and FCHR. In several of the cases, complainants alleged discrimination based on multiple protected classes, bringing the total number of complaints by basis to 70. Most discrimination cases in Seminole County are based either on disability or race and the data shows a surge of complaints in 2018 and 2019.

Table 48: Basis for Housing Discrimination Cases in Seminole County, 2015-2020.							
	2015	2016	2017	2018	2019	2020*	Total by Basis
Race	1	1	2	4	8	2	18
Disability	3	3	4	15	6	1	32
Familial Status			1	2	1		4
Sex	1			2		1	4
National Origin	1	2		2	3	1	9
Color					1		1
Religion	1						1
Retaliation				1			1
Total by Year	7	6	7	26	19	5	

Data Source: FCHR; HUD FHEO Region IV

* From January 1 through April 1, 2020

The following table compares Seminole County's housing complaint data to the nation and to Florida from statistics available for 2018. The basis for complaints in the County were comparable to the state and national averages in that fair housing complaints based on disability and race were the most reported type of housing discrimination.

Table 49: Basis for Housing Discrimination Cases Nationally, Florida, and Seminole County, 2018

Basis	Nation	Florida	Seminole County
Race	16.21%	20.20%	15.38%
Disability	51.78%	55.56%	57.69%
Familial Status	7.29%	8.08%	7.69%
Sex	14.72%	4.04%	7.69%
National Origin	10.03%	11.11%	7.69%
Color	1.67%	0.00%	-
Religion	2.68%	4.04%	-
Other	14.84%	-	3.85%

Data Source: National Fair Housing Alliance, The Case for Fair Housing 2018 Fair Housing Trends Report; FCHR 2018 Annual Report; HUD FHEO Region IV. Percentages may add to more than 100% because discrimination was based on multiple protected classes.

The survey conducted during the development of this AI also provides relevant data on the current state of fair housing in Seminole County. Approximately 9.5% of respondents said they have experienced housing discrimination since living in the County. When asked to identify the basis on which they believe they were discriminated against, approximately 8.61% stated race/ethnicity, 6.56% stated Color, and 4% stated familial status.

The review of fair housing complaint data is not enough to identify the fair housing issues in the County since complaints are based on allegations of unlawful discrimination. Fair housing issues may also be identified through a review of the disposition of the cases. The 56 cases reviewed were resolved in the following ways:

- Complainant failed to cooperate – 2 cases or 3.3%.
- No cause determination – 28 cases or 45.16%.
- Conciliation or settlement successful – 12 cases or 19.35%.
- Dismissed for lack of jurisdiction – 1 case or 1.61%.
- Complaint withdrawn by complainant after resolution – 3 cases or 4.8%; and
- Open cases - 9

The high number of cases that were found to have no cause may indicate an individual's lack of awareness about their rights under the fair housing laws. This may also contribute to the under-reporting of discrimination and supports the need for additional fair housing education. Additionally, the nature of the complaints that were found to have cause may indicate the need for education and outreach on specific protections.

Fair Housing Discrimination Suits Filed by Department of Justice

Seminole County does not have an unresolved letter of findings issued by Department of Justice nor lawsuits filed alleging a pattern or practice or systemic violation of a fair housing or civil rights law against the County. There is also no claim under the False Claims Act related to fair housing, nondiscrimination, or civil rights generally, including an alleged failure to affirmatively further fair housing.

Reasons for any Trends or Patterns

The National Fair Housing Alliance 2019 Fair Housing Trends Report found most complaints based on disability can be partially attributed to the fact disability cases are often more overt and more easily detected than other types of housing discrimination. Disability complaints usually involve denial of a request for a reasonable modification or accommodation to the housing unit or a multi-family property that is not accessible in obvious ways.

Hate Crimes Data

Hate crimes are crimes based upon bias against a protected class. The protected classes monitored by the FBI are race/ethnicity/ancestry, religion, sexual orientation, disability, gender, and gender identity.

The nation had 2.2 hate crimes per 100,000 people in 2017, compared to just over .32 for Seminole County, meaning Seminole County had fewer reported hate crimes per capita when compared to national figures.

Table 50: Hate Crimes Data										
Year	Number of incidents per bias motivation						Number of incidents per quarter			
	Race/ Ethnicity	Religion	Sexual Orientatio n	Disability	Gender	Gender Identity	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter
2018	2								2	
2017	1		1						1	1
2016			1					1		
2015	1							1		
Total	4		2							

Data Source: FBI UCR Hate Crime Statistics

Identification of Impediments

Public Sector

This section of the AI examines public policies of the jurisdiction and identifies impediments to fair housing choice.

Zoning and Site Selection

Land use and zoning laws can contribute significantly to segregation. The local government controls land use and development through its comprehensive plan, zoning regulations, subdivision regulations, and other laws and ordinances passed by the local governing body. These regulations and ordinances govern the types of housing that can be constructed, the density of housing, and various residential uses in a community.

The Seminole County Land Development Code recognizes thirty-three (33) zoning districts/categories. Seminole County has several overlays and special areas that can be found in both the Comprehensive Plan and Land Development Code. There are no unusual characteristics in the County's Residential Zoning codes, of which there are 15 residentially zoned districts. Specifically, the County's Zoning districts reflect typical land use regulations for similar counties in Florida – large lot sizes (starting at 8,400 square feet for R-1 single family district) and high setbacks. The County should be commended for its inclusion of its affordable housing district (R-AH), which allows for significantly smaller lot sizes and small units.

Seminole County does not specifically allow, by right, accessory dwelling units (ADUs) in its single-family residential zoning districts. Seminole County should permit ADUs in all single-family residential zoning districts and establish impact fee rates specific to ADUs.

Table 51: Residential Districts				
		Min. Lot Size	Min. Unit Size	Front Setback
R-1	Single-Family Dwelling District	8,400 sq. ft	700 sq. ft	35 ft
R-1A	Single-Family Dwelling District	9,000	1,100	25
R-1AA	Single-Family Dwelling District	11,700	1,300	25
R-1AAA	Single-Family Dwelling District	13,500	1,600	25
R-1AAAA	Single-Family Dwelling District	21,780	1,600	25
R-2	One- and Two-Family Dwelling District	9,000	1,400 for duplex 700 for SFH	25
R-3	Multi-Family Dwelling District	13 du/ac		25 - 35
R-3A	Multi-Family Dwelling District	10 du/ac		25 – 35
R-4	Multi-Family Dwelling District	BCC approval		25

R-AH	Affordable Housing Dwelling District	SFH – 3600 Duplex – 7200	700	
RM-1	Single-Family Mobile Home District	7,000	n/a	20
RM-2	Single-Family Mobile Home Park District	5,000	n/a	20

Data Source: Seminole County, Zoning Code

A focus on zoning districts or overlays in high poverty and majority-minority neighborhoods, and their respective use and density requirements, can reveal land use requirements which maintain concentration of low-income households by race/ethnicity. Jurisdictions with significant disparity in density permissions between low-income and segregated neighborhoods compared to areas populated with high-income and White households may be effectively reinforcing low-income and race/ethnicity segregation patterns.

Zoning codes have been found to have a substantial impact on the rights of persons with disabilities to fair housing. By intentionally clustering people with disabilities in a few areas zoned for assisted living facilities, cities may segregate people with disabilities from the broader community and limit their housing choice. State law requires that cities allow “community residents,” small group homes with less than 14 or 6 (different parts of the law conflict) residents with disability, in single family and multi-family residential zones with few restrictions. However, many cities have been slow to integrate this rule into their local zoning code.

Seminole County’s Zoning Code provides for the de-concentration of foster care and group home facilities. The code attempts to prevent a high concentration of these facilities, granting the Board of Adjustment authority to approve of new facilities or additions to an existing facility. It considers factors such as the number of other such facilities licensed by the state (excluding foster homes) in the vicinity of the proposed site. The code acknowledges the limited capacity of a neighborhood's existing social structure to accommodate foster care and group home facilities.

Much of the zoning within the Unincorporated County is primarily agricultural (A-1) or rural (A-5), with a significant number of planned developments (PD) in the largely residential and urban southern part of the County. Most of the zoning districts/categories only allow for single-family density and other construction which may decrease availability of housing choices. Seminole County may consider allowing and encouraging diverse housing options along a spectrum of density in residential areas to support affordability and walkable communities.

PHA and other Assisted/Insured Housing Provider Tenant Selection Procedures; Housing Choices for Certificate and Voucher Holders

The Seminole County Housing Authority (SCHA) currently administers rental assistance programs throughout the county through three programs: (1) Housing Choice Voucher Program (Section 8); (2) Low-Income Public Housing; and (3) Tenant Based Rental Assistance (TBRA) Program.

The housing choice voucher program assists very low-income families, the elderly, and the disabled to afford decent, safe, and sanitary housing in the private market. Housing assistance is provided on behalf of the family or individual and participants can find their own housing, including single-family homes, townhouses, and apartments. The participant is free to choose any housing that meets the requirements of the program and is not limited to units located in subsidized housing projects.

TBRA vouchers are for elderly and disabled residents currently residing in Seminole County.

The Seminole County Housing Authority owns and operates a thirty rental unit complex in the City of Oviedo. The authority has four one-bedroom units, ten two-bedroom units, ten three-bedroom units and six four-bedroom units. Families residing in the Villas must meet income eligibility guidelines. At present, the Public Housing Waiting List is closed. It is common practice to close waiting lists when the expected wait time for an available unit exceeds 12 months. The current wait time for a unit is 36 months. The Seminole County Housing Authority does not currently have enough units of affordable housing stock in place for the number of individuals that are seeking affordable housing.

Concentration of Voucher Holders

The map below shows the concentration of housing choice vouchers by census tract in Seminole County. The map shows vouchers as a share of the total housing units in a census tract. Substantial concentrations of voucher holders in the same tracts may indicate that voucher holders are highly segregated in high poverty, low-opportunity census tracts.

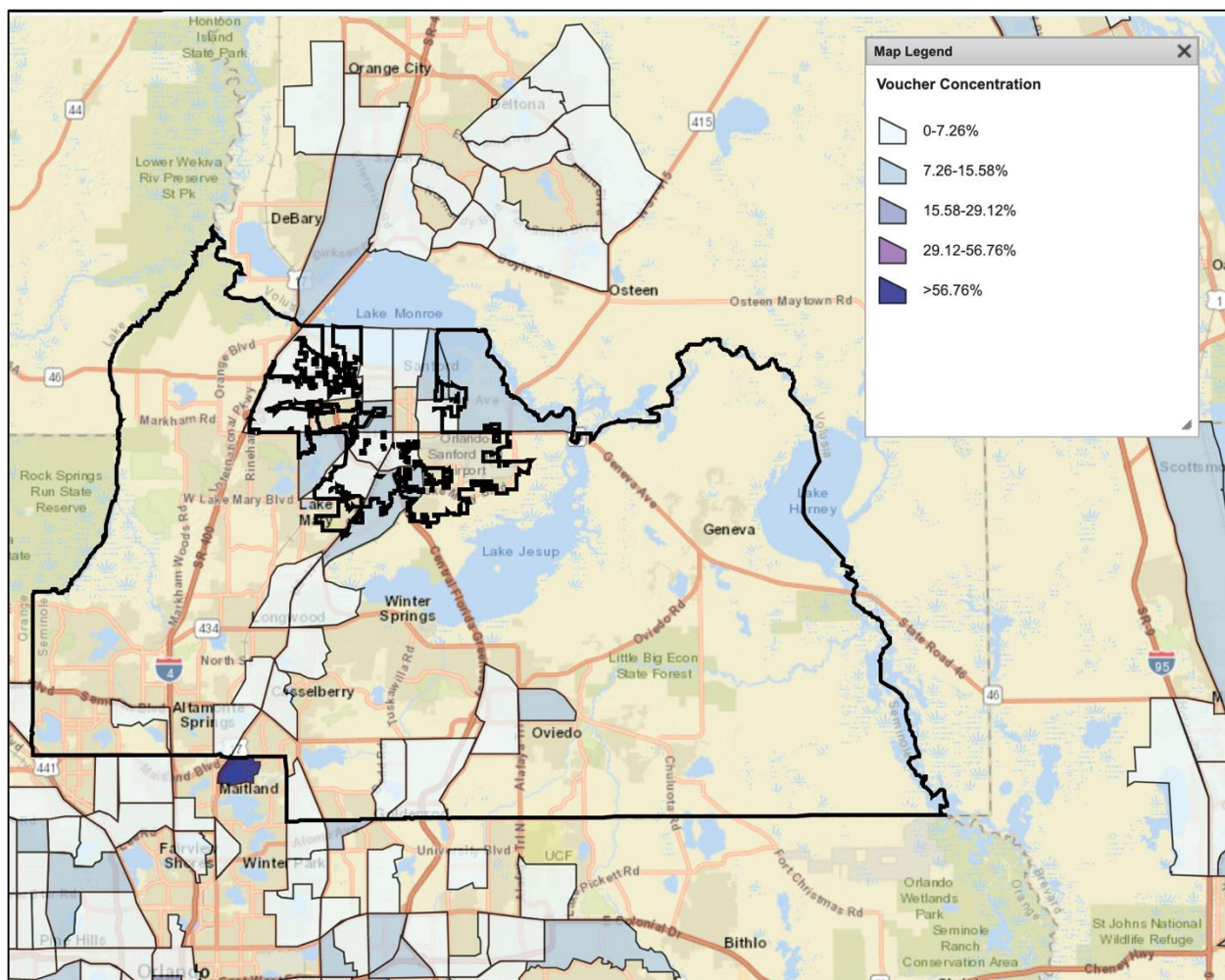


Figure 18. Concentration of housing choice voucher holders by census tract, Seminole County.
Source: HUD CPD Maps voucher concentration; accessed: October 2020.

When compared to the Low Poverty and Labor Market Engagement Indexes, the voucher concentrations do not show a definite concentration of vouchers in low-opportunity census tracts.

Sale of Subsidized Housing and Possible Displacement

There is no expectation for the sale of subsidized housing through the SCHA. Additionally, as of the date this report was published, SCHA had not executed administrative actions in pursuit of any rental assistance demonstration (RAD) program-related conversions. If the SCHA does elect to pursue RAD conversion for any of its inventory, Seminole County staff should serve as an objective advocate for anti-displacement programs implemented by the SCHA.

Seminole County adheres to HUD regulations regarding the sale of subsidized homes when administering its HUD entitlement grant funding. Specifically, the County administers a minor home repair program, a rehabilitation/reconstruction program, and a purchase assistance program. The policies currently in place for the homeownership and housing rehabilitation programs are as follows:

Minor Home Repair Program

- Total household income cannot exceed 80% of the AMI, adjusted for family size, as defined by HUD, and applicants must demonstrate proof of income.
- Assistance offered in the form of a grant.
- Assistance offered to eligible low-income homeowners who would not otherwise be able to make necessary repairs to correct safety concerns and improve the immediate livability of their home.
- Program is provided to assist in the form of a grant.

Rehabilitation/Reconstruction Program

- Funds can be used for necessary home repairs of greater cost than eligible under the minor home repair program. Projects are restricted to repairs necessary to improve the health, safety, and well-being of the household or contribute to the structural integrity and preservation of the home.
- Eligible repairs are completed by County-approved and licensed building contractors.
- Program is provided in the form of an interest free, deferred payment loan to qualified homeowners.

Purchase Assistance Program

- The program provides down payment assistance to income eligible first-time homebuyers.
- Program may offer up to \$50,000, depending on income level and need.
- Applicants must have a minimum of total combined household income at or below 120% AMI; must be a first-time homebuyer; and pre-approved for a first mortgage through a private lender approved by Seminole County.

Property Tax Policies

The Seminole County Property Appraiser offers the following exemptions for protected class members:

- Limited-Income Senior Exemption: additional \$25,000
- Veteran/Military Exemption: \$5,000
- Total and Permanent Disability Exemption: \$500

These property tax policies allow for accessibility for a significant number of protected classes to allow for greater affordability and accessibility of housing choice.

To explain further, the following table indicates statewide approved property tax exemptions and additional exemptions that may be offered by County Property Appraisers.

Table 52: Statewide and Seminole County Approved Property Tax Exemptions.		
Exemption	Statewide Adoption	Adoption by County Property Appraiser
Active-Duty Military/Veteran	Yes	Yes
Elderly (65+)	No	No
Disabled/Blind	Yes	N/A
First Responder/Spouse	Yes	N/A
Low-Income Senior	No	Yes
Long-Term Senior Resident	No	No

Data Source: FHC analysis of property tax exemptions, State and Seminole County

Planning and Zoning Boards

Seminole County has several committees that routinely make decisions with an impact on fair housing choice. These include the Planning and Zoning Commission and the Seminole County Board of Adjustment. These boards should represent the interests of all Seminole County residents and should be aware of and responsive to the needs of the County's protected classes.

The County's Planning and Zoning Commission / Local Planning Agency (P&Z / LPA) consists of volunteer unpaid members appointed by the Board of County Commissioners to advise and make recommendations to the Board of Commissioners on planning and land development matters. The P & Z Commission's recommendation is included in the staff report when the project is heard at the Board meetings and the Board makes the final determination after considering the following: recommendations of the P&Z Commission, presentation by the applicant, public input, and staff findings. Public hearing items include, but are not limited to rezones, major amendments, and large- and small-scale future land use amendments. Given the appointment provisions of the P&Z / LPA which depend on appointment by the Board of County Commissioners, Seminole County staff should consider impact on equity, segregation, and access to affordable housing in its staff findings report submitted to the P&Z Commission.

The Seminole County Board of Adjustment is a group consisting of five (5) regular members and two (2) alternate members, all of which are appointed by the Seminole County Board of County Commissioners (BCC). It is empowered to hear and decide Variances and Special Exceptions. The Board considers the compatibility of proposed uses with surrounding land uses and development patterns in the area.

The Seminole County Community Services Department administers appropriate federal, state, and local programs and works with three significant groups within the region: (1) the poor; (2) the public sector; and (3) the private sector, to identify and eliminate/reduce poverty. The Department works to stimulate social and economic opportunities to improve the quality of life for Seminole County residents.

Building Codes (Accessibility)

An important way that state and local governments impact fair housing choice for persons with disabilities is through the building and construction codes adopted and enforced in their jurisdictions. While federal housing discrimination laws impose design and building accessibility standards for certain housing and public facilities, Congress and HUD place the direct responsibility of meeting those federal standards on the architects/designers, builders, and operators of the covered accommodations, and do not require or authorize local government authorities to interpret or enforce federal accessibility requirements. There is no plan review or permitting process under the FHA or Americans with Disabilities Act (ADA). Indeed, under these laws, a building permit or certificate of occupancy from a local government does not shield a builder from enforcement action by HUD or the DOJ or from liability in a private civil action. Rather, local building departments and inspectors only enforce state and local accessibility codes or laws. However, by incorporating the federal standards into the state and local codes, state and local governments can ensure another level of oversight and protection of the unique housing needs faced by persons with disabilities.

All construction in Seminole County must be in accordance with the Florida Building Code, Florida Fire Prevention Code, and the 2015 International Property Maintenance Code as amended. The Florida Building Code includes the primary guidance containing scoping and technical requirements for accessibility to sites, facilities, buildings, and elements by individuals with disabilities. The requirements are to be applied during the design, construction, additions to, and alteration of sites, facilities, buildings, and elements. The 1993 Florida Legislature enacted the “Florida Americans with Disability Accessibility Implementation Act” which incorporated the architectural accessibility requirements of the Americans with Disabilities Act of 1990 into Florida law and maintained existing provisions of Florida law thought to be more stringent than the ADA accessibility guidelines. In 1997 the legislature amended the Act to address U.S. Department of Justice (DOJ) concerns with Florida requirements, which might not have been equivalent or more stringent than ADA architectural standards, to obtain federal certification of Florida’s building code as substantially equivalent to the Federal ADA Standards for Accessible Design as adopted by the Department of Justice (DOJ) in 28 CFR 36.

As a recipient of federal funds, Seminole County is obligated to comply with the Fair Housing Act (FHA) and the Fair Housing Amendments Act, which expanded the FHA and established terms to enforce harsher penalties for those who sell or rent property and discriminate against persons with disabilities. Multifamily housing units covered by the FHA’s accessibility requirements are those located in a building of four or more units, built for first occupancy after March 13, 1991, and includes both privately owned and publicly assisted housing rental units and for sale units. It includes not just apartments and condominiums but also assisted living facilities, continuing care facilities, nursing homes, public housing developments, HOPE VI projects, projects funded with HOME or other federal funds, transitional housing, single room occupancy units (SROs), shelters designed as a residence for homeless persons, dormitories, hospices, extended stay or residential hotels, and more. When an addition is built onto an existing building, the addition of four or more units is regarded as a new building and must meet the design requirements. If any new public and common use spaces are added, they are required to be accessible. In buildings with four or more dwelling units and at least one elevator, all dwelling units and all public and common use areas are subject to the Act’s design and construction requirements. In buildings with four

or more dwelling units and no elevator, all ground floor units and public and common use areas are subject to the Act's design and construction requirements.

Seminole County is obligated to comply with additional laws due to receipt of federal assistance including Section 504 of the Rehabilitation Act of 1973 (which applies to programs and activities receiving federal funds), Titles II and III of the Americans with Disabilities Act (ADA) (which apply to programs, services, and activities provided or made available by public entities and to public accommodations, respectively), and the Architectural Barriers Act (which applies to federal facilities). Any housing (including single family detached homes) constructed by federal, state, or local government entities or constructed using federal funds may be subject to accessibility requirements under these laws.

Housing funded by HUD also must meet the Uniform Federal Accessibility Standards (UFAS) or a standard that is equivalent or stricter. Under the UFAS, all federally assisted new construction housing developments with five or more units must design and construct 5% of the dwelling units, or at least one unit, whichever is greater, to be accessible for persons with mobility disabilities. An additional 2% of the dwelling units, or at least one unit, whichever is greater, must be accessible for persons with hearing or visual disabilities.

Private Sector

Lending Policies and Practices

Homeownership is vital to a community's economic well-being and lending policies and procedures can have a significant impact on fair housing choice. To satisfy the requirements of fair housing law, all persons must have the ability to live where they want and can afford. Prospective homebuyers need access to mortgage credit, and programs that offer homeownership should be available without discrimination. The task in this Home Mortgage Disclosure Act (HMDA) analysis is to determine the degree to which the housing needs of Seminole County residents are being met by home loan lenders.

HMDA, enacted by Congress in 1975, is implemented by the Federal Reserve Board's Regulation C. The regulations apply to certain financial institutions including banks, savings associations, credit unions, and other mortgage lending institutions. The HMDA's objectives include ensuring that borrowers and loan applicants receive fair treatment in the home loan market. HMDA information is collected from public lending institutions and discloses public loan data used to:

- Determine if financial institutions are serving community housing needs.
- Assist public officials with public sector investment to help attract private investment to areas of need; and
- Identify possible discriminatory lending patterns and enforce anti-discrimination statutes.

Data provided by the Federal Financial Institutions Examination Council (FFIEC), includes the type, purpose, and characteristics of each home mortgage application that lenders receive during the calendar year. It also includes additional data related to those applications including loan pricing information, action taken, property location (by census tract), and additional information about loan applicants including sex, race, ethnicity, and income.

Data presented in this section are aggregated at the county level.

Table 53: Loan Approval and Denial Rates by Applicant Race and Ethnicity Seminole County, 2018						
Applicant Income	Non-Hispanic				Hispanic	All Applicants**
	White	Black	Asian	Other*		
Low Income (0 – 50% AMI)						
Total Applications	2,631	393	170	33	888	4,115
Loan Origination Rate	45.3%	37.4%	42.4%	39.4%	41.2%	40.8%
Loan Denial Rate***	29%	39.4%	34.1%	39.4%	36.4%	35.4%
Moderate Income (50 – 100% AMI)						

Total Applications	5,092	522	438	42	1,258	7,352
Loan Origination Rate	59.2%	50%	51.8%	42.8%	54.7%	51.2%
Denial Rate	16.3%	23.2%	20.3%	42.8%	18.6%	23.8%
High Income (100% AMI and over)						
Total Applications	4,971	278	616	22	585	6,472
Loan Origination Rate	59.9%	50.7%	53.8%	45.5%	55.9%	53.2%
Denial Rate	14.9%	22.3%	13.5%	22.7%	16.7%	17.6%
Total						
Total Applications	12,694	1,193	1,224	97	2,731	17,939
Loan Origination Rate	54.6%	46%	49.3%	42.6%	50.6%	48.4%
Denial Rate	20.1%	28.3%	22.6%	34.9%	23.9%	25.6%
<i>*Includes American Indians and Alaskan Natives, Native Hawaiians and Pacific Islanders, and persons of other or multiple races. Note: Analysis is based on applicants only and does not include co-applicants. **All Applicants includes categories excluded from other figures in table: Mexican, Puerto Rican – Not Hispanic or Latino, Information not provided by applicant, not applicable. ***Applications denied by financial institution. Does not include applications approved but not accepted; application withdrawn by applicant; file closed for incompleteness; preapproval request denied by financial institution.</i>						

Data Source: FFIEC 2018 Home Mortgage Disclosure Act Data

For low-income applicants, loan origination rates ranged from 37.4% for Non-Hispanic Blacks to 45.3% for Non-Hispanic White applicants. Denial rates were highest for Non-Hispanic Blacks and Other applicants (39.4%) followed closely by Hispanic applicants (36.4%) and lowest for White applicants (29%).

Moderate income applicants generally had higher approval rates and lower denial rates than the low-income group for all races/ethnicities. In the moderate-income band, minority applicants had loan origination rates from 42.8% (Other) to 54.7% (Hispanic), compared to 59.9% for Whites. Denial rates were highest for Other applicants (42.8%) and lowest for white (16.3%).

At the high-income level, applicants had even higher approval rates and lower denial rates than the low-income group for all races/ethnicities except for Asians. In the high-income band, minority applicants had origination rates from 45.5% to 55.9%, compared to 75.2% for Whites. Denial rates were highest for Other applicants (22.7%) and lowest for Asian (13.5%).

The table below identifies reasons for loan denials by race and ethnicity. For each minority group, the distribution of loan denial reasons is compared to that of White applicants (as a reference group). Findings are summarized below:

- Reasons for denial vary by race and ethnicity. Collateral, debt-to-income ratio, and credit history were top reasons for denials across all race/ethnicities.
- For Asian loan applicants, denial reasons varied, with debt-to-income ratio being the highest reason (36.6%) followed by credit history (22.9%).
- For Latino applicants, credit history was the largest share for denials (36.6%) followed by debt-to-income ratio (30.9%)
- For Black applicants, credit history had the highest share (31.9%) followed by debt-to-income ratio (29.4%).

Table 54: Reasons for Loan Denial by Applicant Race and Ethnicity Seminole County, 2018					
	Non-Hispanic				Hispanic
	White	Black	Asian	Other	
Total Number of Denials	3,123	401	262	68	809
Debt-to-income ratio	30.4%	29.4%	36.6%	32.4%	30.9%
Employment history	.6%	0.9%	.7%	NA	1.4%
Credit history	30.7%	31.9%	22.9%	41.2%	36.6%
Collateral	14.4%	12.9%	12.6%	4.4%	12.5%
Insufficient cash	2.8%	2.2%	3.8%	2.9%	1.9%
Unverifiable information	2.9%	2.2%	2.6%	1.4%	2.6%
Credit application complete	9.9%	7.7%	10.3%	8.8%	6.7%
Mortgage insurance denied	0%	0%	0%	0%	0%
Other	8%	12.2%	10.3%	8.8%	7.5%

Data Source: FFIEC 2018 Home Mortgage Disclosure Act Data

Fair Housing Enforcement

The federal FHA prohibits discrimination in housing based on race, color, religion, sex, national origin, familial status, and disability. The U.S. Department of Justice (DOJ) and HUD are jointly responsible for

enforcing the FHA. Two HUD programs are dedicated to the enforcement of the Fair Housing Act: The Fair Housing Assistance Program (FHAP) and the Fair Housing Initiatives Program (FHIP). HUD's Office of Fair Housing and Equal Opportunity (FHEO) is responsible for administering FHIP, FHAP, and HUD's investigation of fair housing and fair lending complaints. The Civil Rights Division of the U.S. Department of Justice (DOJ) may also investigate complaints.

The State of Florida also adopted its own fair housing laws. HUD has determined that the Florida Fair Housing Act (FFHA) is substantially equivalent to the federal Fair Housing Act meaning that the state law covers the protected classes in the Fair Housing Act. State or local law may also provide additional protected classes as is the case in Florida where it is unlawful to discriminate in land use decisions or in the permitting of developments based on protected characteristics, or based on the source of financing of a development or proposed development. The FFHA also protects persons who are pregnant or in the process of becoming legal custodians of children 18 years of age or younger, or persons who are themselves handicapped or associated with a handicapped person.

State and local government agencies certified by HUD to enforce state or local fair housing laws that are substantially equivalent to the Fair Housing Act receive FHAP funds. HUD provides funding to the Florida Commission on Human Relations (FCHR), the agency charged with enforcing the state's civil rights laws, including the FFHA. Through annual work share agreements FCHR receives and investigates housing discrimination complaints referred by HUD. HUD provides FHAP funding for processing dual-filed complaints, training, provision of technical assistance, the creation and maintenance of data information systems, and the development and enhancement of education and outreach projects, special enforcement efforts, partnership initiatives, and other fair housing projects.

Legal services organizations, typically mission-based nonprofits, offer free or low-cost services to clients based on a wide range of discrimination bases. In the Seminole County area, Community Legal Services of Mid Florida (CLSMF) provides representation to low-income and vulnerable individuals in civil matters, with eligibility typically based on income and assets of all members of the household. CLSMF takes cases involving housing, family law, public benefits, consumer protection, employment, healthcare, and education.

While not an agency that is formally responsible for responding to fair housing complaints, the Seminole County Bar Association's Legal Aid Society (SCBALAS) also offers legal assistance and advice to renters on a wide range of issues, including landlord-tenant disputes, unlawful detainers, ejectments, and fair housing discrimination cases. The County has an active relationship with SCBALAS through provision of general revenue funding to provide a variety of legal services.

Complaint Process

Persons suspecting that they have been discriminated against can file a fair housing complaint at the federal, state, or local level by contacting HUD, DOJ, FCHR, or CLSMF. Any complaints received by the County alleging fair housing violations are referred to CLSMF. The chart below provides information on how residents can file a housing discrimination complaint with any of the fair housing enforcement organizations.

Table 55: How to file a Housing Discrimination Complaint

<p>To file a housing discrimination complaint with HUD:</p> <ul style="list-style-type: none"> • Place a toll-free call to 1-800-440-8091 or TTY 1-800-927-9275. • Complete the “on-line” complaint form available on the HUD website. • Submit a claim of housing discrimination on the HUD Complaint Mobile App; or • Mail a completed complaint form or letter to: <p>Atlanta Regional Office of FHEO U.S. Department of Housing and Urban Development Five Points Plaza 40 Marietta Street, 16th Floor Atlanta, Georgia 30303-2806</p>	<p>To report an incident of housing discrimination to the DOJ, or to alert the DOJ of matters involving a pattern or practice of discrimination or matters involving denial of rights to groups of persons:</p> <ul style="list-style-type: none"> • Call the Fair Housing Tip Line at 1-800-896-7743. • Email fairhousing@usdoj.org; or • Mail a letter to: <p>U.S. Department of Justice Civil Rights Division Housing and Civil Enforcement Section – G St. 950 Pennsylvania Avenue, N.W. Washington, DC 20530</p>
<p>To file a complaint with FCHR, complainants must contact the agency within one year of the date on which the alleged act of discrimination occurred.</p> <ul style="list-style-type: none"> • Telephone 850-488-7082; or • Mail or fax the Technical Assistance Questionnaire for Housing Complaints to: <p>Florida Commission on Human Relations Office of Customer Service 4075 Esplanade Way, Room 110 Tallahassee, FL 32399 Facsimile 850-487-1007</p>	<p>To file a complaint with CLSMF:</p> <ul style="list-style-type: none"> • Complete the “online intake” form at https://www.clsmf.org/ • Or Phone (800) 405-1417

If a complaint is filed with HUD under the federal Fair Housing Act and the complaint falls within the jurisdiction of FCHR, HUD must refer the complaint to the local or state agency and may take no further action, except under limited circumstances. Once the complaint is filed with FCHR, the process is as follows:

- A person alleging discrimination under the FFHA has one year after the discriminatory housing practice to file a complaint with FCHR.
- FCHR has 100 days after receiving the complaint to complete an investigation and issue a determination.
- FCHR can decide to resolve the complaint and eliminate or correct the alleged discriminatory housing practice through conciliation.

- If, within 180 days after a complaint is filed, FCHR has been unable to obtain voluntary compliance, the complainant may initiate civil action or petition for an administrative determination.
- If the commission finds reasonable cause, the claimant may request that the Attorney General bring the civil action against the respondent.
- A civil action must be commenced within two years after the alleged discriminatory act occurred.
- The court may continue a civil case if conciliation efforts by FCHR or by a local housing agency are likely to result in a satisfactory settlement.
- If the court finds that a discriminatory housing practice has occurred, the court must issue an order prohibiting the practice and providing administrative relief.
- Possible remedies include injunctions, restraining orders, fines and actual and punitive damages, court costs, and reasonable attorney's fees.

Informational Programs and Community Outreach

For fair housing planning to be comprehensive it must address the general public and local government officials' lack of knowledge about unlawful discriminatory practices, fair housing laws, and fair housing objectives. Below is a summary of the fair housing education and outreach activities conducted by Seminole County and CLSMF in recent years.

- The County partnered with CLSMF to provide free training and education on fair housing in 2019. The County has also partnered with the SCBALAS to offer free legal services for residents facing housing discrimination and other housing-related legal issues.

Despite the efforts to educate residents and housing providers about their rights and responsibilities, the housing discrimination complaint data analyzed in section "Fair Housing Complaints or Compliance Reviews", and the AI survey results suggest that there is still a lack of knowledge by residents about fair housing laws and actions that are discriminatory.

Visitability in Housing

Visitability is a voluntary standard endorsed by HUD to allow mobility impaired persons to visit families and friends where this would not otherwise be possible. Visitability means that 1) at least one entrance is at grade (no step), approached by an accessible route, such as a sidewalk, 2) the entrance door and all interior doors on the first floor are at least 34 inches wide, offering 32 inches of clear passage space, and 3) at least a half bathroom on the main floor of the house. The visitability concept applies to single family and other housing types that are not covered by federal law to incorporate accessibility features. Unlike accessibility, a visitable home does not require that all features of a dwelling unit be made accessible. The benefits of visitability include:

- An increase in the availability of housing options for individuals who may not require full accessibility;
- Assistance for the property owners in making reasonable accommodations and reducing, in some cases, the need for structural modifications or transfers when individuals become disabled in place; and
- Improvement in the marketability of units.

Seminole County has not developed a written visitability policy however, the County has adopted the Florida Building Code, which includes compliance with the 2012 Florida Accessibility Code for Building Construction adopted pursuant to Section 553.503, Florida Statutes. The Florida Housing Finance Corporation has also adopted Universal Design and Visitability Features in all state funded developments that involve new construction and rehabilitation of housing units.

The Florida Accessibility Code expands the requirements of the Fair Housing Act and the ADA standards by requiring that all new single-family houses, duplexes, triplexes, condominiums, and townhouses provide at least one bathroom with a door that has a 29-inch clear opening on each habitable grade level. This provision in the Florida Accessibility Codes promotes the concept of visitability and the County does make accessibility improvements in accordance with the building code and rehabilitation standards.

Assessment of Current Public and Private Fair Housing Programs and Activities in the Jurisdiction

The County is committed to furthering fair housing and continues to fund housing and neighborhood revitalization activities through its HUD entitlement grant funding programs and the state's SHIP funding to assist in providing housing choice. Coordination with various state and local agencies has resulted in significant program and service diversity to assist in meeting housing needs throughout the County. The County will continue to work in conjunction with private and public organizations to increase fair housing opportunities and review and re-evaluate current programs and activities consistently to ensure compliance in furthering fair housing efforts.

Current programs supporting fair housing efforts in the County include:

HUD Entitlement Funding

Seminole County is entitled to the Community Development Block Grant (CDBG), the HOME Investments Partnership Program (HOME), and Emergency Solutions Grant (ESG) funding. These programs are versatile programs providing communities with resources to address a wide range of community development needs. Created under Title I of the Housing and Community Development Act, CDBG is a primary funding source for the County in addressing community revitalization, housing, and economic development needs. The CDBG program contains a regulatory requirement to affirmatively further fair housing based upon HUD's obligation under Section 808 of the Fair Housing Act. Grantees under the CDBG program must comply with this requirement and certify that it will further fair housing efforts. For the CDBG program, HUD defines "affirmatively furthering fair housing" as requiring a grantee to:

- Conduct an analysis to identify impediments to fair housing choice within the jurisdiction.
- Take appropriate actions to overcome the effects of any impediments identified through the analysis; and
- Maintain records reflecting the analysis and actions taken in this regard.

This document serves as the County's updated AI. The County is committed to eliminating discriminatory practices in housing opportunities for all protected groups identified under fair housing laws. This AI coincides with the County's 2020-2024 Consolidated Plan, which includes the County's certification of compliance with fair housing requirements.

Seminole County continues to further fair housing efforts through its HUD entitlement grant programs by funding activities including minor home repair, major housing rehabilitation, new construction of affordable housing for owners and renters, tenant-based rental assistance, purchase assistance, public improvements, public services, homeless services, and rapid re-housing. Seminole County is committed to providing benefits to the greatest number of people while targeting low-and moderate-income residents, special needs populations, and the homeless. The County uses its funding allocation in a

strategic approach to alleviate poverty through various housing and community development activities focused on neighborhood revitalization. Neighborhood infrastructure development that incorporates social design into physical improvements changes neighborhood landscapes and significantly improves the social connectedness of its residents. Community revitalization is essential to bolstering the health of a neighborhood and for providing housing choices in a suitable living environment connected to jobs, healthcare, transportation, and educational opportunities. These efforts all lower barriers to fair housing choice in Seminole County.

State Housing Initiatives Partnership Program

The State Housing Initiatives Partnership (SHIP) program, administered through the Florida Housing Finance Corporation (FHFC), has the primary objective of encouraging and creating partnerships that will assist in the production and preservation of affordable housing in the state of Florida. Funds must be used to benefit low-income and moderate-income persons. The SHIP program has required set-asides for funding that grantees must follow. A minimum of 65% of grant funds must be expended on eligible homeownership activities, a minimum of 75% is to be expended on eligible construction activities, at least 30% must be reserved for very-low-income households, a minimum of 30% must be reserved for low-income households, and a minimum of 20% for households with special needs. The SHIP program funds affordable housing initiatives that support fair housing.

Seminole County offers SHIP funding for purchase assistance, emergency repairs, owner occupied rehabilitation, new construction/rehabilitation, disaster relief, rental construction/rehabilitation, and rental assistance. These strategies are detailed in the County's Local Housing Assistance Plan (LHAP) in accordance with state requirements. Finally, these strategies are administered in accordance with state statute 760.20-760.37, which makes it unlawful to discriminate based on race, color, religion, sex, national origin, age, handicap, or marital status in the award application process for eligible housing.

Attainable Housing Strategic Plan

Seminole County leadership recognizes the direct link between a sufficient supply of housing that is affordable to low-income residents and equal fair housing choice for all residents of the County. Therefore, the County's focus on promoting affordable (attainable) housing is an active and productive measure for addressing barriers to fair housing choice.

To address the County's affordable housing crisis, Seminole County participated in a regional affordable housing initiative with Orange County, Osceola County, and the City of Orlando. The two-year effort concluded that there are a range of strategies that could, and should, be deployed by the County to promote an effective affordable housing agenda. The Attainable Housing Strategic Plan resulted in the identification of short-term (1-3 years) and long-term (4-10) action steps including recommendations such as:

- Adopt a Community Land Trust Ordinance
- Establish an Affordable Housing Trust Fund

- Permit Accessory Dwelling Units (ADUs) in all Single-Family Residential Zoning Districts and establish Impact Fee Rates Specific to ADUs
- Remove Regulatory Barriers/Promote Missing Middle Housing Types
- Inclusionary Housing
- Land Banking
- Leveraging County Development Rights
- Purchase Assistance Programs
- Improve Access to Transit to Increase Housing Affordability

Conclusions and Recommendations

HUD defines an impediment to fair housing choice as an action, omission or decision based on race, color, religion, sex, disability, familial status, or national origin that restricts or has the effect of restricting housing choices or the availability of housing choices. Throughout this analysis various community issues have surfaced, highlighting strengths and areas of weakness that require improvement. Some of these issues represent general community needs and, while valid, do not restrict or have the effect of restricting housing choice and thus do not constitute impediments.

In this section, impediments to fair housing choice are listed. Each impediment is associated with an “action plan,” or set of specific actions to be conducted by Seminole County and partner agencies over the next 5 years. By implementing the recommendations, the County will start to correct the identified impediments to fair housing choice.

The recommendations and actions listed in this section meet two critical criteria: they must be both meaningful and feasible. Actions must be meaningful in that they have a reasonable expectation of reducing barriers to fair housing choice. Actions must also be feasible in that they are within the scope of the County’s authority and within the scope of funding considerations.

Impediments and Action Plan

Table 56: Impediments and Action Plan				
#	Impediment	Actions	Timeline	Intended Outcomes
1	<p>Lack of awareness by residents and landlords of fair housing laws.</p> <p>High number of fair housing complaints based on disability.</p>	<ul style="list-style-type: none"> Partner with a fair housing training/outreach organization by offering funding and programming support to provide fair housing training to landlords on fair housing laws specific to persons with a disability, foreign born and limited English proficient populations. Reach out to the disability community during the consolidated planning process. Place flyers and fair housing information in public facilities, including flyers in “easy read” friendly to people with disabilities. Conduct targeted outreach and education to landlords in high opportunity/low poverty areas. Advertise April Fair Housing Month and make public announcements regarding opportunities to learn about fair housing. Include the HUD fair housing logo on all housing program related documents. Include resources on fair housing that are accessible to people experiencing disability, including “easy read” and brail resources. 	2020 - 2024	<ul style="list-style-type: none"> Improved public understanding of fair housing laws as measured by fair housing survey. Reduce instances of discrimination based on disability. Improved public confidence in the fair housing complaint process as measured by fair housing survey. Increased attendance at fair housing outreach and trainings. Reduced the count of discrimination complaints since disability.
2	Insufficient supply of affordable rental and owner housing	<ul style="list-style-type: none"> Partner with a Community Land Trust (CLT) and support its operations with quality publicly owned surplus lands, unrestricted operating funds, and development subsidies. 	2020 - 2024	<ul style="list-style-type: none"> Increased count of assisted and naturally occurring affordable housing units developed in County.

Table 56: Impediments and Action Plan

#	Impediment	Actions	Timeline	Intended Outcomes
		<ul style="list-style-type: none">▪ Pursue development of ADU funding program to support private adoption and development of ADUs in high opportunity tracts in the County.▪ Coordinate annual review of FHFC RFAs and identify deployable public and private resources to ensure applications are submitted to relevant RFA opportunities.▪ Research establishing a mandatory inclusionary zoning ordinance in high opportunity neighborhoods undergoing significant redevelopment.▪ Implement a SHIP annual rental assistance strategy, in addition to rental assistance for households experiencing homelessness.		<ul style="list-style-type: none">▪ Increased count of permanently affordable single-family home parcels managed by a CLT.▪ Creation of ADU policy and financial support for ADU development.▪ Increased count of new FHFC-funded affordable units in County.▪ Report on feasibility of mandatory inclusionary zoning ordinance.
3	Poor credit history and collateral as a barrier to homeownership.	<ul style="list-style-type: none">▪ Expand access to credit counseling services for low-income and protected classes by partnering with a credit counseling agency and conducting outreach to majority-minority census tracts.	2020 - 2024	<ul style="list-style-type: none">▪ Reduced number of loan origination denials based on credit, as reported by FFIEC HMDA data.