

City of Brookhaven 2021 – 2025 Analysis of Impediments to Fair Housing Choice

DRAFT – April 26, 2021

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Section I: Introduction and Executive Summary of the Analysis

This Analysis of Impediments to Fair Housing Choice (AI) documents a variety of fair housing issues faced by Brookhaven, Georgia, assesses their underlying causes, and identifies goals and actions to address those issues. It aims to harness data, community input, and policy analysis to craft solutions that will have a real impact for the people of Brookhaven. Ultimately, this information will advance housing choice and stability, help families break the cycle of poverty and find new opportunities, address segregation, and invest in the communities that need it most.

The goal of the analysis is to take meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws.

As recipients of Community Development Block Grant (CDBG) funds from the U.S. Department of Housing and Urban Development, Brookhaven must periodically develop an AI, to better understand current fair housing needs in the city and communicate these needs to the public. The AI is a part of a multi-stage planning process: it provides a focused, comprehensive look into fair housing issues and generates fair housing goals, which the city will then use to inform later planning processes, such as the Consolidated Plan (designating use of block grant funds), as well as other relevant activities.

While housing issues are complex and multi-faceted, and affect all residents of the city, the purpose of this AI is to focus specifically on *fair housing* and related needs and actions. The AI therefore examines whether housing issues are experienced differently on the basis of characteristics protected by the Fair Housing Act, which was crafted to address segregation and to prohibit discrimination on the basis of race, ethnicity, national origin, religion, sex, familial status, and disability. It also includes characteristics protected under state and local law.

The AI follows the Assessment of Fair Housing process and template, as developed by HUD in its Fair Housing Planning Guide. As described below, its scope includes in-depth looks at a number of areas relevant to fair housing, including: trends and description of demographics; patterns of segregation and integration; identification of racially/ethically concentrated areas of poverty ("R/ECAPs"); disproportionate housing needs (including cost burden and the adequacy and safety of housing); disparities in access to opportunity (education, employment, low poverty exposure, and environmental health); disabilities and access; publicly-supported housing; and fair housing enforcement, outreach, and capacity. In addition to data, maps, and policy analysis, it examines barriers to fair housing and their underlying causes ("contributing factors"). Most importantly, its data and analyses (including community input) provide the foundation for meaningful fair housing goals that address specific local issues.

This analysis examines several dimensions of access to opportunity, by supplementing HUD data with local data and knowledge. Often, groups that have experienced housing discrimination have lower access to a variety of opportunity factors, which are discussed in this document. These disparities include lower access to educational opportunity, employment; transit; lower access to areas of concentrated poverty (low poverty exposure); and lower access to healthy neighborhoods. Lack of access to opportunity factors often goes hand-in-hand with segregation and housing choice.

Study Authors

The 2021-2025 Analysis of Impediments to Fair Housing Choice was conducted by Community Planning Insights (CPI) and Hope Strategy Group. CPI is a small planning firm located in Dayton, Ohio that focuses on community and neighborhood planning, housing policy, community engagement, and comprehensive planning for communities of all sizes. Hope Strategy Group (HSG) is a management consulting firm located in Toledo, Ohio that specializes in assisting professionals, organizations, and communities in reaching their full potential through leadership development and coaching, operational performance management, and developing strategies for a more equitable workplace and distribution of investments in communities.

Aaron K. Sorrell, AICP principal and owner, has over 20 years of experience in the planning and community development field, primarily focused on community and neighborhood development policy and implementation for medium and large cities. Aaron is a certified planner with the American Institute of Certified Planners (AICP) and a certified Economic Development Professional by the National Development Council. Aaron has managed numerous planning and community development projects including zoning and land use regulations, community development strategies, housing and neighborhood studies and effective community engagement and visioning.

Catherine Crosby, HSG managing partner and owner, has nearly 20 years of experience in civil rights enforcement in the areas of housing and employment, developing equitable community and economic development strategies supported by cross sector partnerships, working with communities to address intergroup tension, and implementing community relations programs and initiatives that foster diversity, equity, and inclusion within organizations and communities. Catherine is a Credentialed Manager through the International City/County Managers Association (ICMA) and a board member of the National Community Reinvestment Coalition (NCRC) and the Higher Learning Commissioner (HLC). She has worked with community and regional banks to develop community benefit agreements and assisted financial institutions with developing programs and products to meet the unique needs of communities in their markets.

Methodology Used

This document consists of five sections:

- Introduction and Executive Summary
- Jurisdictional Data Analysis
- Identification of Public and Private Sector Impediments of Fair Housing Choice This section will review local, state, and federal policies to determine if they exacerbate or eliminate impediments to fair housing choice. This section will also provide an analysis of the local lending environment.
- Assessment of Current Public and Private Fair Housing Programs and Activities in the Jurisdiction

This section reviews the local jurisdictions fair housing programs and activities support or hindering fair housing choice. This section also includes an analysis of fair housing complaints filed with HUD or the local jurisdiction and an overview of whether the previous studies recommendations have been addressed.

• Fair Housing Plan

This section identifies implementation strategies to eliminate or mitigate the negative impacts of specific barriers identified through the data and policy analysis. Actions identified to address the impediments to fair housing will be included in the city's FY 2021-2025 Five Year Consolidated Plan.

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Community Engagement and Survey Results

The City of Brookhaven utilized a broad outreach campaign to provide opportunities for interested residents, stakeholders, elected officials, neighborhood and civic leaders, and community agencies to provide input into the development of the Analysis of Impediments to Fair Housing Choice. Outreach efforts were designed to reach a broad array of interested constituents and provide them the opportunity to submit input and feedback on their schedule, including public meetings, online surveys, focus groups, and individual one-on-one interviews. Specific efforts were made to encourage participation from low- and moderate-income residents, non-English speaking residents, public housing residents, and agencies and institutions including non-profit developers, community-based organizations and business and civic leaders. Unfortunately, COVID-19 restrictions required all meetings and interviews to be held virtually. Bi-lingual facilitators were available at each meeting, so attendees did not need to make prior arrangements for translation services.

The city's community engagement efforts began in January 2021. The City of Brookhaven developed an online community needs and fair housing survey in English and Spanish that was available and distributed to the public between January 18, 2021 and March 8, 2021. This survey was emailed to approximately 4,600 agencies and stakeholders through the city's email distribution list. The survey was advertised on the city's Facebook page, website as well as The Champion (English) and Mundo Hispanico (Spanish) newspapers. Additionally, over 5,700 bilingual postcards were directly mailed to residents living in Brookhaven's low- and moderate-income census tracts.

The survey had over 479 responses from a broad array of Brookhaven stakeholders.

The city convened a series of focus groups and agency interviews between February 15 – 25, 2021. The focus groups consisted of public and non-profit agencies that represented stakeholders in the following topics: Affordable Housing Needs, Fair Housing, Community Development Needs, Homelessness and Special Needs Populations. Twenty-one (21) agency representatives participated in the various focus groups and agency interviews.

Survey Results

The online survey asked participants a wide range of questions about the housing and community development needs, as well as their experiences with housing discrimination and fair housing issues. The results presented in this study are focused on the topics of housing need and opportunity, and respondents experiences with discrimination and other fair housing issues.

Approximately 33% of respondents were looking for a new place to live in the past two years; approximately 20% were last looking for new housing two to five years ago, and 47% haven't looked for new housing in over five years.

When asked about important neighborhood or housing features, the top five most important elements were:

- 1. Safety
- 2. Housing within their price range
- 3. Proximity to amenities (parks, shopping, entertainment
- 4. Housing size and layout that fits their household needs
- 5. Proximity to good schools

The high cost of housing in Brookhaven was reflected in responses with 87% indicating the cost of housing is the biggest obstacle stopping respondents from living where they want in the city.

When asked about barriers to fair housing choice in Brookhaven, respondents indicated the following were barriers:

- Insufficient income 54%
- Not enough affordable housing 51%
- Not enough quality schools 31%
- Institutional barriers (zoning, city regulations) 19%
- Lack of public transportation 19%
- Discrimination of protected classes 15%
- Lack of employment opportunities 13%
- Insufficient access to public assistance or services 10%
- Discrimination based on sexual orientation 4%

When asked about whether they had experienced housing discrimination, 69% indicated they had not, 16% indicated they had experienced housing discrimination, and 16% were unsure. Of the respondents who answered affirmatively, the discrimination was based on:

- Race 58%
- Source of income 19%
- Sex 8%
- Color 5%
- Familial status 5%
- Disability 3%
- Religion 2%
- National origin 2%

When asked about fair housing education and outreach, respondents had mixed results. Respondents felt they were knowledgeable about fair housing laws with 73% indicating they are aware of their rights under the Fair Housing Act, while 27% are not. However, only 43% of respondents know where to report housing violations, and 57% do not.

Over 85% of respondents indicated they had not seen any advertising related to fair housing enforcement or housing counseling in the past 12 months, while only 15% of respondents indicated they had seen such advertising.

Source of Funding for the Study

Community Development Block Grant funds were used to develop this study.

Conclusions and Impediments Overview

Since its incorporation, the City of Brookhaven has taken proactive steps to address issues of income and housing in equality. This study only identified four impediments to fair housing choice within the city.

Impediment 1: Disparity in housing needs and affordable housing throughout Brookhaven

- 1.1 There are signs of gentrification with higher income families buying homes in lower income areas.
- 1.2 There is very low utilization of Housing Choice Vouchers in Brookhaven, especially in lower income areas.
- 1.3 Market forces may encourage affordable housing owners to convert to market-rate after the required compliance period.

Impediment 2: Disparity in homeownership among Blacks and Hispanics compared to Whites

2.1 Significant disparities exist between White homeownership and homeownership among Black and Hispanics.

Impediment 3: Unequal access to opportunity

- 3.1 Income inequities exist between women and men, Blacks and Whites, and Hispanics and Whites.
- 3.2 Disparities exist between White business owners and minority and women-owned businesses.
- 3.3 Significant disparity in educational attainment at all levels among Hispanics when compared to the rest of the population. There is also a disparity between Blacks and Whites with a Bachelor's degree or higher.
- 3.4 COVID-19 made access to internet a necessity for households.
- 3.5 Community health needs assessments and data show access to healthcare is a concern for Blacks, Hispanics, single parents, and low-income populations.

Impediment 4: Segregated living patterns could lead to creating R/ECAP concentrated areas of poverty for Hispanics

4.1 Data indicates that the Hispanic population is concentrated in the Southern part of the city.

Section 2: Jurisdictional Background Data

The City of Brookhaven is located in northern DeKalb County, Georgia in the Atlanta metro region. Brookhaven is a relatively new city, having officially incorporated in 2012. The city spans approximately 12 square miles and has an estimated population of nearly 60,000 residents. While Brookhaven's incorporation is recent, the area has a long history within the Atlanta region. The following is a brief history of Brookhaven. (City of Brookhaven, 2021)

Brookhaven's first permanent European settler was John Evins, who started a plantation around 1810. Harris and Solomon Goodwin, who moved to Georgia from South Carolina, became owners of the land in the 1830s. The Goodwin home and the family graveyard have been preserved at the 3900 block of Peachtree Road, near Dresden Drive. A train station known as Goodwin's was constructed along the Atlanta and Richmond railway in 1873. The settlement of Cross Keys, with a population of 250 in 1876, was located one mile north along the rail line from Goodwin's.

Atlanta residents began constructing summer cottages in the community around 1900. In 1910, 150 acres on the north side of Peachtree Road were purchased for development as a planned community surrounding a golf course. Residences developed in three phases, with Brookhaven Estates designed in 1910, followed by Country Club Estates in 1929 and the Carleton Operating Company in 1936. Independently, Edwin P. Ansley sold lots in the area, calling it Oglethorpe Park. Construction of the historic neighborhood was largely complete by the end of World War II.

The area was incorporated as the city of North Atlanta in 1924. In 1963, the North Atlanta's leaders asked the state legislature to allow a referendum on a new city charter. The legislature agreed, but also included an additional option in the referendum: disincorporation. The majority of voters chose disincorporation, and the city's charter was dissolved in 1965.

From the 1950s to the 1970s, major commercial and residential development took place in Brookhaven, resulting in the area being largely built-out by 1980. The Brookhaven/Oglethorpe MARTA Station opened in 1984. In 1986, the Capital City Club and its surrounding estate homes were placed on the National Register of Historic Places, and the neighborhood is now officially known as "Historic Brookhaven.

The idea of incorporating Brookhaven as a city was first brought up in 2007, with the purpose of securing local community control over planning, zoning, land use, police, fire protection, and parks and recreation—rather than having those issues decided by the county. In 2011, the idea of Brookhaven was revived, and on July 31, 2012, 55% of voters chose to incorporate the city of Brookhaven.

Demographic Data

The Fair Housing Act prohibits discrimination in the sale or rental of housing including against individuals seeking a mortgage or housing assistance, or in other housing related activities. To appropriately identify strategies to address contributing factors that impact fair housing issues that limit a person's ability to access safe and stable communities, there must be an examination of demographic data to determine how protected classes are impacted by historical and systemic discrimination in housing.

The following protected classes are covered under the Fair Housing Act:

Race
Color
National Origin
Religion

Population

The metro Atlanta area is one of the fastest growing regions in the country, and Brookhaven is anticipated to share in the growth of population and households. Table 1 provides population projections for Brookhaven. The data indicates that the population is anticipated to grow 5.96% and households 6.28% by 2025. The median income is projected to grow by 12.5% over the next five years.

Sex

Familial Status Disability

Table 1: Population and Household Projections

Demographics	Base Year: 2020	Projected: 2025	% Change
Population	59,920	63,493	5.96
Households	25,183	26,767	6.28
Median Income	\$91,697	\$103,176	12.51

Source: ESRI Demographics / CPI

Figure 1 illustrates those areas in Brookhaven that are expected to see increased population growth. While population growth is projected for all parts of the city, the areas along the main corridors of Peachtree Road and Buford Highway are projected to see the greatest amount of growth.

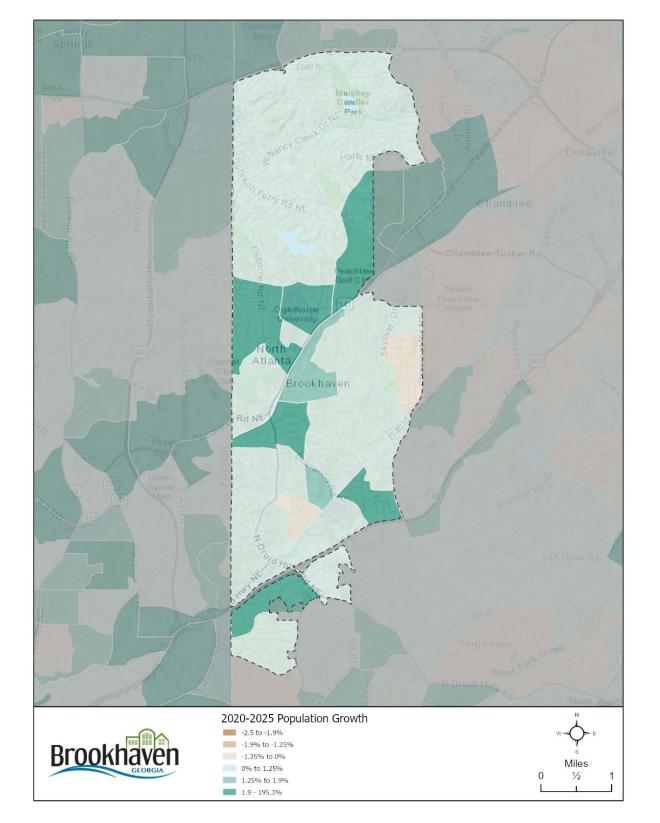


Figure 1: 2020-2025 Brookhaven Population Growth

Source: ESRI Demographics

Table 2 provides population data by race and ethnicity for Brookhaven. According to the 2019 ACS 5-year estimates, Brookhaven is predominately White. Brookhaven has a sizable Hispanic population.

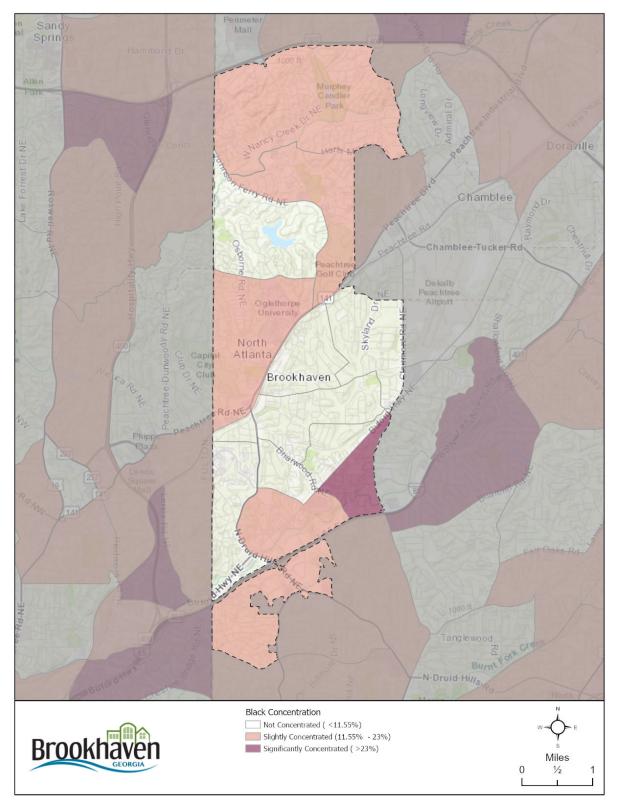
Table 2: Population by Race/Ethnicity

Population				
Total Population	53,819			
White	37,741	70%		
Black/African American	6,102	11%		
American Indian/Alaska	2,218	4%		
Asian	3,108	6%		
Native Hawaiian/Pacific Islander	14	0%		
Other Race	2,988	6%		
Population of Two or More Races	1,648	3%		
Hispanic Population	12,066	22%		

Source: 2019 ACS 5-Year Estimates

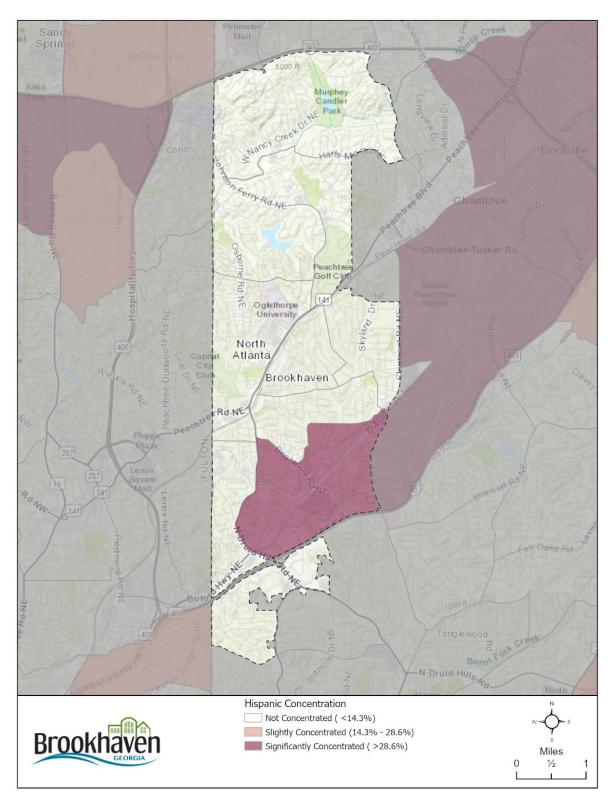
Figure 2 illustrates the concentration of Black residents in Brookhaven, and Figure 3 illustrates the concentration of Hispanic residents. Black households appear to be well distributed throughout the city, Hispanic households appear to be concentrated in the southern part of the city.

Figure 2: Black Population Concentration



Source: 2013 - 2017 CHAS

Figure 3: Hispanic Population Concentration



Source: 2013 - 2017 CHAS

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Dissimilarity

The dissimilarity index measures whether one particular group is distributed across census tracts in the metropolitan area in the same way as another group. A high value indicates that the two groups tend to live in different tracts. Dissimilarity ranges from 0 to 100. A value of 60 (or above) is considered very high. It means that 60% (or more) of the members of one group would need to move to a different tract in order for the two groups to be equally distributed. Values of 40 or 50 are usually considered a moderate level of segregation, and values of 30 or below are fairly low levels of segregation. Since Brookhaven was not a city during the 2010 Census, this analysis examines the Metropolitan Statistical Area (MSA).

The White / Black dissimilarity index has reduced significantly over the past 40 years. In 1980 the index was 76.9 and in 2010 the index fell to 58.4.

The White / Hispanic dissimilarity index has increased from 30.3 in 1980 to 49.4% in 2010. This suggests that Hispanic households are living in increasingly segregated communities or areas.

Foreign born persons represent 21.8% of the Brookhaven population with an estimated 69.6% who are not citizens. Residents that are not citizens may be more vulnerable to having limited access to opportunity.

Table 3: Foreign-Born Population

Foreign-born Population	11,737	21.80%
Naturalized citizen	3,573	39.40%
Not a citizen	8,164	69.60%

Source: 2019 ACS 5-Year Estimates

Of the population in Brookhaven over the age of five, 34% presently speak a language other than English. According to Census estimates, of those residents that speak a language other than English, 9.2% speak English "less than very well". Spanish is the most common language spoken other than English.

Table 4: English Proficiency for Population Over 5

Language		
Language other than English	15,708 persons	34.00%
Less than very well	8,860 persons	19.20%
Limited English households	2,213 households	9.80%

Source: 2019 ACS 5-Year Estimates

Table 5: Limited English-Speaking Households

Limited English-Speaking Households	% Language Spoken	% Limited English
Total		16.50%
Spanish	19.60%	12.50%
Indo-European	4.60%	1.40%
Asian and Pacific Island	3.20%	1.40%
Other language	2.80%	1.20%

Source: 2019 ACS 5-Year Estimates

Age

Brookhaven is a young community with a median age of 34.2. The median age for males is 34.6 and 33.9 for females. Children under the age of 18 represent 22% of the population and residents over the age of 65 represent 10%.

Table 6: Population by Age

	Age	
Under 5 years	5,140	10%
Under 18 years	12,051	22%
Over 65 years	5,314	10%

Source: 2019 ACS 5-Year Estimates

Gender

Table 7 shows slightly more males than females in Brookhaven.

Table 7: Population by Gender

	Gender	
Male	27,266	51%
Female	26,553	49%

Source: 2019 ACS 5-Year Estimates

Households

According to the Census glossary, a householder is the person, or one of the people, in whose name the home is owned, being bought, or rented. A family householder is a householder living with one or more people related to him or her by birth, marriage, or adoption. The householder and all people in the household related to him or her are family members (Census, 2021).

There are two types of households, family (more than one related person), non-family (singles, cohabitators). Total households include family and non-family.

Table 8 and Table 9 provide an overview of households and householders.

There are an estimated 22,549 households in Brookhaven of which 24.63% have children under the age of 18. There are almost twice as many female householders, and female householders with a child under 18, compared to male householders. Male average householder size is larger than female householders. Married households make up 41.15% of Brookhaven's households, and nearly 50% of those have at least one child in the household. Seniors living alone make up 7.8% of households.

Table 8: Brookhaven Household Types

Brookhaven	%
eholds	
22,549	
2.35	
5,554	24.63%
seholds	
9,279	41.15%
3.11	
4,460	48.07%
eholds	
11,443	50.75%
3.15	
ousehold	
11,106	49.25%
1.38	
holder	
783	3.47%
4.35	
336	6.05%
eholder	
1,381	6.12%
3.86	
758	13.65%
s Living Alone	
	7.80%
	22,549 2.35 5,554 seholds 9,279 3.11 4,460 seholds 11,443 3.15 ousehold 11,106 1.38 sholder 783 4.35 336 eholder 1,381 3.86 758

Source: 2019 ACS 5-Year Estimates

Table 9: Brookhaven Households

	Household size is less than 5	Household size is 5 or more	Grand Total
Renter occupied	10,124	890	11,014
household type is family, no spouse*	1,179	325	1,504
household type is married couple family	1,900	565	2,465
household type is non-family	7,045	0	7,045
Owner occupied	9,775	555	10,330
household type is family, no spouse*	535	20	555
household type is married couple family	5,530	535	6,065
household type is non-family	3,710	0	3,710
Grand Total	19,899	1,445	21,344

Source: 2013-2017 CHAS

Disability

The Census defines disability as a long-lasting physical, mental, or emotional condition. This condition can make it difficult for a person to do activities such as walking, climbing stairs, dressing, bathing, learning, or remembering. The condition can also impede a person from being able to go outside the home alone or work at a job or business. The ACS attempts to capture six aspects of disability (hearing, vision, cognitive, ambulatory, self-care, and independent living), which can be used together to create an overall disability measure, or independently to identify populations with specific disability types.

In the American Housing Survey (AHS), a person with a *hearing* disability is deaf or has a hearing impairment that makes it very difficult to hear conversation, televisions, or radio broadcasts. A person with a *vision* disability is blind or has serious difficulty reading or driving due to a visual impairment even when wearing glasses. A *cognitive* disability results from a physical, mental, or emotional problem, having difficulty remembering, concentrating, or making decisions. An *ambulatory* disability is having serious difficulty walking or climbing. A person with a *self-care* disability has serious difficulty dressing or bathing oneself. An *independent living difficulty* results from a physical, mental, or emotional problem, having difficulty doing errands alone such as visiting a doctor's office or shopping (Census, 2021).

Table 10: Disability by Category

	Disability Type	Population	%	Over Age 65	%
	With a hearing difficulty	795	1.5%	464	9.1%
	With a vision difficulty	571	1.1%	277	5.4%
	With a cognitive difficulty	1,096	2.3%	303	6.0%
	With an ambulatory difficulty	1,794	3.7%	1,085	21.3%
	With a self-care difficulty	457	0.9%	272	5.4%
	With an independent living difficulty	922	2.2%	574	11.3%
~					

Source: 2019 ACS 5-Year Estimates

Table 11: Brookhaven Disability by Race / Ethnicity

Disability							
Race/Ethnicity	w/Disability	%					
White	2,331	6.2%					
Black	398	6.6%					
American Indiana and Alaska Native	154	6.9%					
Asian	222	7.1%					
Native Hawaiian and Other Pacific Islander	6	100.0%					
Other Race	211	7.1%					
Two or More Races	111	6.8%					
Hispanic	542	4.5%					

Source: 2019 ACS 5-Year Estimates

Table 12: Disability by Gender

Gender		
Male	1,748	6.4%
Female	1,685	6.4%

Source: 2019 ACS 5-Year Estimates

Visitability

According to Visitability.org, visitability refers to a single-family or owner-occupied housing designed in such a way that it can be lived in or visited by people who have trouble with steps or who use wheelchairs or walkers. A house is visitable when it meets three basic requirements:

- One zero-step entrance
- Doors with 32 inches of clear passage space
- One bathroom on the main floor you can get into in a wheelchair

Visitability focuses on laws and policies. Since there is no additional cost to visitability design standards, the most desirable do not include a financial benefit to meet the standards (Living, 2021). Brookhaven is a fairly young community but should consider proactively incorporating visitability standards in developments and building regulations.

Education

Brookhaven residents have a high level of educational attainment with 67.4% of the population having a Bachelor's degree or higher compared to 44.9% for Dekalb County, 32.5% for the state, and 33.1% for the U.S. as a whole. Females have a slightly higher level of educational attainment than males.

E	ducation					
	Total	%	Male	%	Female	%
Population Over 25	37,880		19,100		18,780	
Less than 9th grade	2,482	6.60%	1,408	7.40%	1,074	5.70%
9th to 12th grade, no diploma	1,648	4.40%	981	5.10%	667	3.60%
High school graduate (includes equivalency)	3,945	10.40%	1,807	9.50%	2,138	11.40%
Some college, no degree	3,270	8.60%	1,697	8.90%	1,573	8.40%
Associate degree	993	2.60%	541	2.80%	452	2.40%
Bachelor's degree	14,612	38.60%	7,111	37.20%	7,501	39.90%
Graduate or professional degree	10,930	28.90%	5,555	29.10%	5,375	28.60%
High school graduate or higher	33,750	89.10%	16,711	87.50%	17,039	90.70%
Bachelor's degree or higher	25,542	67.40%	12,666	66.30%	12,876	68.60%

Table 13: Brookhaven Educational Attainment by Gender

Source: 2019 ACS 5-Year Estimates

When race is factored in, there is a disparity in educational attainment for Black and Hispanics, when compared to White residents. There is a higher percentage of Blacks graduating from high school than Whites. However, the percentage of Whites with a Bachelor's degree or higher is 13% higher than Blacks. The disparity is more significant for the Hispanic community with only 46.7% graduating from high school and 21% with a Bachelor's degree.

Table 14: Educational Attainment by Race and Ethnicity

Educational Attainment	White	Black	American Indian/ Alaskan	Asian	Native Hawaiian	Some Other	Two or More Races	Hispanic
High School or Higher	92.1%	95.2%	39.3%	92.0%	100.0%	47.2%	81.9%	46.7%
Bachelor or Higher	73.3%	60.0%	0.6%	73.6%	0.0%	18.6%	64.2%	21.0%

Source: 2019 ACS 5-Year Estimates

Income

Income is the gauge used to determine the well-being of the population. It also provides an indication of how well the city can meet the needs of its residents. Income is the sum of the amounts reported separately for wage or salary income; net self-employment income; interest, dividends, or net rental or royalty income or income from estates and trusts; Social Security or Retirement income; Supplemental Security Income (SSI); public assistance or welfare payments; retirement, survivor, or disability pensions; and all other income. Therefore, income does not reflect the fact that some families receive part of their income in the form of noncash benefits, such as food stamps, health benefits, subsidized housing, and goods produced and consumed on the farm (Census, 2021).

Median household income refers to the income level earned by a given household where half of the households in the geographic area of interest earn more and half earn less (Census, 2021).

Below are the FY 2021 Income Limits for Dekalb County, the county where Brookhaven is located. Dekalb is part of the Atlanta-Sandy Springs-Roswell, GA HUD Metro FMR Area. The average family size for Brookhaven is between 3-4 persons.

FY 2021 Income Limits										
	Persons in Family									
FY 2021 Income Limit Category	Median Family Income	1	2	3	4	5	6	7	8	
Extremely Low (30%) Income Limits (\$)		18,100	20,700	23,300	26,500	31,040	35,580	40,120	44,660	
Very Low (50%) Income Limits (\$)	\$86,200	30,200	34,500	38,800	43,100	46,550	50,000	53,450	56,900	
Low (80%) Income Limits (\$)		48,300	55,200	62,100	68,950	74,500	80,000	85,500	91,050	
Source: HUD User										

Table 15: FY 2020 Income Limits

Table 16 illustrates the percentage of households by type and income strata. While Brookhaven has a high median income overall, nearly 30% of the households in Brookhaven are considered low, very low or extremely low income.

Additionally, the majority of large families and the elderly or frail elderly are considered a moderate-income household or lower. Married couples have a significantly higher household income than any other household type.

HH Income	H	louseholds		Families	Ma	rried Couples	No	on-Families
Less than \$10,000		4.4%		2.1%		1.0%		7.2%
\$10,000 - \$14,999		2.0%		1.6%		0.6%		3.0%
\$15,000 - \$24,999		6.1%		6.9%		4.4%		6.7%
\$25,000 - \$34,999		5.3%		4.4%		3.3%		6.6%
\$35,000 - \$49,999		9.9%		6.0%		4.3%		14.2%
\$50,000 - \$74,999		14.7%		8.2%		6.4%		20.3%
\$75,000 - \$99,000		11.1%		8.5%		8.1%		13.0%
\$100,000 - \$149,999		15.2%		15.1%		15.9%	14.6%	
\$150,000 - \$199,999		10.0%		13.8%		16.1%		5.8%
\$200,000 - or greater		21.2%		33.3%		39.9%		8.5%
Median Income	\$	92,604.00	\$	138,479.00	\$	168,090.00	\$	62,552.00
Mean Income	\$	140,100.00	\$	188,391.00		-	\$	87,706.00

Table 16: Income by Household

Source: 2019 ACS 5-Year Estimates

Table 17 shows income by family type. There is a disparity between male and female income whether non-family or a female household. Both male and female householders with children have significantly lower income compared to married households and families. However, female householders are significantly lower.

Table 17: Income by Family Type

Median Income by Family Type							
Nonfamilies							
Nonfamilies	\$62,552.00						
Nonfamily Female Householder	\$58,544.00						
Nonfamily Male Householder	\$71,020.00						
Families							
Families	\$138,479.00						
Families w/ own Children	\$146,429.00						
3-person Families	\$163,787.00						
4-person Families	\$166,250.00						
Married Familie	S						
Married	\$168,090.00						
Married w/ own children	\$189,167.00						
Female Househol	der						
Female Householder	\$36,446.00						
Female Householder w/ own Children	\$27,136.00						
Male Household	er						
Male Householder	\$52,176.00						
Male Householder w/ own Children	\$35,543.00						

Income Inequality

Income inequality in a community can accentuate differences in social class and status, and serve as a social stressor. Communities with greater income inequality can experience a loss of social connectedness, as well as decreases in trust, social support, and a sense of community for all residents. Income inequality is defined as households with income at the extremes of the national income distribution (the bottom 20%, the top 80%). A higher inequality ratio indicates greater division between the top and bottom ends of the income spectrum. A score of 0 would indicate equity in income distribution. A score less than 0 indicates that more families are represented at the lower end of the income spectrum, while a score above 0 indicates more families are represented in the higher end of the spectrum. Less income could indicate less access to high opportunity neighborhoods with better quality housing. A higher income inequality ratio indicates greater division between the top and bottom ends of the income spectrum. According to the national City Health Dashboard, Brookhaven has an income inequality score of 23.2 meaning more residents are represented at the higher end of the income spectrum or top 80% (Health, City Health Dashboard, 2021)

The median income for Brookhaven is \$54,242. Table 18 shows that the median income for males is 23% higher than females.

Table 18: Individual Income by Gender

	Total	Male	Female
Population Over 25	\$ 60,449.00	\$ 67,769.00	\$ 53,753.00
Less than high school	\$ 20,837.00	\$ 22,474.00	\$ 18,382.00
High School (includes equivalency)	\$ 24,450.00	\$ 31,090.00	\$ 21,195.00
Some College/Associates	\$ 37,760.00	\$ 46,425.00	\$ 30,128.00
Associates	\$ 71,118.00	\$ 85,181.00	\$ 62,494.00
Bachelor's	\$ 94,520.00	\$ 114,308.00	\$ 77,480.00
Median Income	\$ 54,242.00	\$ 60,557.00	\$ 49,168.00

Source: 2019 ACS 5-Year Estimates

Table 19 shows income by race and ethnicity. The data shows that Whites make 97% more than Blacks and 133% more than Hispanics. Asians are the second highest income compared to Whites; however, Whites make 27% more.

Table 19: Income by Race and Ethnicity

Income
\$ 92,604.00
\$110,504.00
\$55,945.00
\$33,450.00
\$86,890.00
-
\$ 46,034.00
\$70,281.00
\$ 47,408.00

Source: 2019 ACS 5-Year Estimates

Public Assistance

Public assistance refers to assistance programs that provide either cash assistance or in-kind benefits to individuals and families from any government entity. There are two major types of public assistance programs: social welfare programs and social insurance programs. Benefits received from social welfare programs are usually based on low income means test eligibility criteria.

Programs include Supplemental Security Income (SSI), Supplemental Nutrition Assistance Program (SNAP), Special Supplemental Nutrition Program for Women Infants and Children (WIC), Temporary Assistance for Needy Families (TANF) including Pass through Child Support, and General Assistance (GA).

Benefits received from social insurance programs are usually based on eligibility criteria such as age, employment status, or being a veteran. Programs include social security, Department of Veterans' Affairs benefits, unemployment insurance compensation, and worker's compensation.

Retirement income is based on the employee and/or the employer's contributions to the employee's individual account that are invested on the employee's behalf and depend on investment performance. Table 20 shows the various types of income received by residents of Brookhaven (Census, 2021).

Retirement Income includes payments people receive from eight sources: companies or unions; federal government (Civil Service); military; state or local governments; railroad retirement; annuities or paid-up insurance policies; individual retirement accounts (IRAs), Keogh, or 401(k) payments; or other retirement income (Census, 2021).

Social security income includes social security pensions and survivors' benefits and permanent disability insurance payments made by the Social Security Administration prior to deductions for medical insurance. The Census Bureau does not include Medicare reimbursements for health services as social security benefits (Census, 2021).

Over 85% of Brookhaven residents income come from wages and salaries followed by nearly 27% for interest, dividends, and rental income. Despite nearly 30% of residents being considered somewhere between extremely low-income and low-income, there is a small percentage of residents receiving food stamps (4.6%) and cash assistance (0.6%).

Type of Income	Number of Households	% of Households
Wages or Salary	19,239	85.3%
Self-employment	2,557	11.3%
Interest, Dividends, Rental Income	6,073	26.9%
Social Security	3,312	14.7%
Supplemental Security Income (SSI)	378	1.7%
Cash Public Assistance	131	0.6%
Food Stamps/SNAP or Cash Assistance	1,045	4.6%
Retirement	2,387	10.6%
Other Types of Income	1,145	5.1%

Table 20: Type of Income by Household

Source: 2019 ACS 5-Year Estimates

Poverty

If the income of a family or an individual is below the official poverty threshold, then that family or individual is in poverty. The poverty threshold follows the Office of Management and Budget (OMB) set of income thresholds that vary by family size and composition to determine who is in poverty. (Census, 2021) Table 21 shows the 2021 poverty threshold by size of family household size. According to Census data, 11.7% of residents live below poverty.

Table 21: 2021 Poverty Thresholds

PERSONS IN FAMILY/HOUSEHOLD	POVERTY GUIDELINE			
For families/households with more than 8 persons, add \$4,540 for each additional person.				
1	\$12,880			
2	\$17,420			
3	\$21,960			
4	\$26,500			
5	\$31,040			
6	\$35,580			
7	\$40,120			
8	\$44,600			

Source: 2021 Health and Human Services Federal Poverty Guidelines

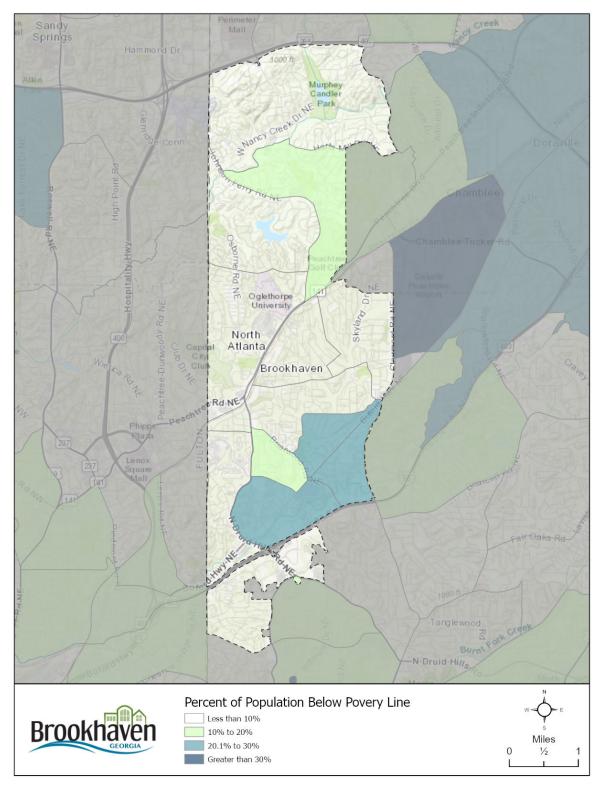
Except for Blacks and Whites, all other races and ethnicities poverty rates are disproportionately higher compared to their representation in the city.

Table 22: Poverty Rate by Race/Ethnicity

Race/Ethnicity	% Below Poverty	% of Population
All	11.70%	
White	7.80%	70%
Black/African American	10.70%	11%
American Indian/Alaska	32.00%	4%
Asian	16.70%	6%
Native Hawaiian/Pacific Islander	42.90%	0%
Other Race	43.60%	6%
Population of Two or More Races	8.40%	3%
Hispanic Populations	29.10%	22%

Source: 2019 ACS 5-Year Estimates

Figure 4: Brookhaven Poverty Rate



Source: 2019 ACS

The poverty rate for females is higher than for males. This has implications for child poverty since there is a higher percentage of female householders with children under 18. Table 24 shows that 20% of the population in poverty are children under the age of 18.

Table 23: Poverty by Gender

Gender	
Male	10.20%
Female	13.20%

Source: 2019 ACS 5-Year Estimates

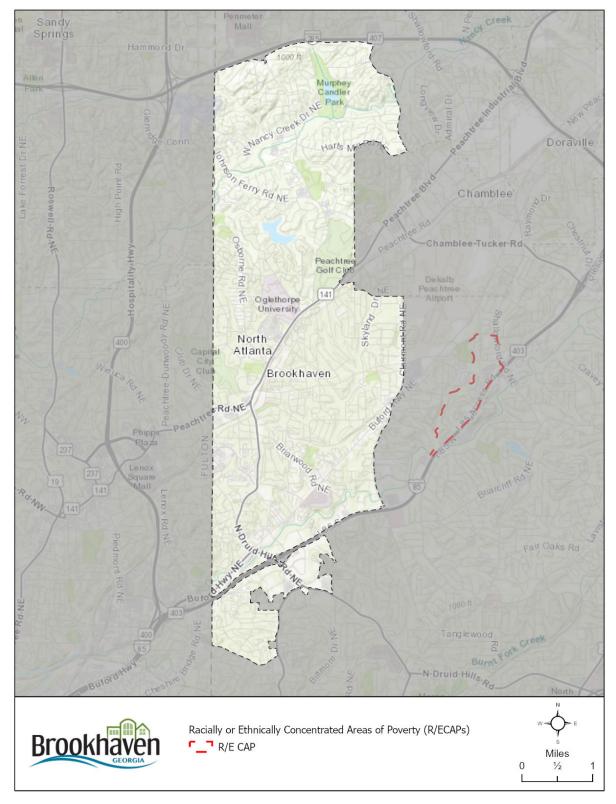
Table 24: Poverty by Age

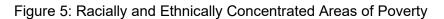
19.90%
19.30%
20.30%
9.30%
11.70%
7.60%
9.00%

Source: 2019 ACS 5-Year Estimates

Racially/Ethnically Concentrated Areas of Poverty

Figure 5 shows Racially and Ethnically Concentrated Areas of Poverty (R/ECAP). The definition involves a racial/ethnic concentration threshold and a poverty test. The racial/ethnic concentration threshold is a non-white population of 50% or more. The poverty threshold for a neighborhood is one that has a poverty rate that exceeds 40%, or is three or more times the average tract poverty rate for the metropolitan area, whichever threshold is lower. Census tracts with this extreme poverty that satisfy the racial/ethnic concentration threshold are deemed R/ECAPs. Brookhaven currently has no areas within the city that meet this definition.





Source: HUD eGIS

The MIT Living Wage model generates a cost-of-living estimate that exceeds the federal poverty thresholds. As calculated, the living wage estimate accounts for the basic needs of a family. The living wage is the minimum income standard that, if met, draws a very fine line between the financial independence of the working poor and the need to seek public assistance or suffer consistent and severe food insecurity. (Technology, 2021) Table 25 provides the living, poverty, and minimum wage amounts for Brookhaven. At a minimum, a family with one parent working and two children would need to make approximately \$80,000 per year based on the average family size of 3-4 persons.

			Living Wage	Poverty Wage	Minimum Wage
1 ADULT		0 Children	\$16.56	\$6.13	\$7.25
		1 Child	\$31.33	\$8.29	\$7.25
		2 Children	\$38.33	\$10.44	\$7.25
		3 Children	\$48.79	\$12.60	\$7.25
2 ADULTS	(1 WORKING)	0 Children	\$25.29	\$8.29	\$7.25
		1 Child	\$29.79	\$10.44	\$7.25
		2 Children	\$33.44	\$12.60	\$7.25
		3 Children	\$35.92	\$14.75	\$7.25
2 ADULTS	(BOTH WORKING)	0 Children	\$12.54	\$4.14	\$7.25
		1 Child	\$17.07	\$5.22	\$7.25
		2 Children	\$21.07	\$6.30	\$7.25
		3 Children	\$24.48	\$7.38	\$7.25

 Table 25: Brookhaven Living Wage Calculator

Source: MIT Living Wage Calculator

Employment

The labor force participation rate is the proportion of the working-age population that is either working or actively looking for work. This rate is an important labor market measure because it represents the relative amount of labor resources available for the production of goods and services. Though subject to some cyclical influences, labor force participation is primarily affected by longer-term structural changes. These might include changes in the age composition of the population, school enrollment and educational attainment, employer-provided pensions, or Social Security benefits. (Census, 2021)

Whites, Blacks, and Hispanics are the largest racial and ethnic groups in Brookhaven. Black and Hispanic unemployment exceed the rate for the city. The unemployment rates for Blacks is 2.5 times higher compared to Whites and twice as high for Hispanics when compared to Whites.

Race/Ethnicity		Labor Force Participation Rate	Unemployment Rate
Total	42,352	79%	3%
White	29,980	79%	2%
Black	5,406	80%	5%
American Indian and Alaska Native	1,265	79%	6%
Asian	2,800	69%	3%
Native Hawaiian/Pacific Islander	14	57%	0%
Some other race alone	1,731	80%	9%
Two or more races	1,156	79%	1%
Hispanic	7,569	83%	4%

Table 26: Labor Force Participation by Race/Ethnicity

Source: 2019 ACS 5-Year Estimates

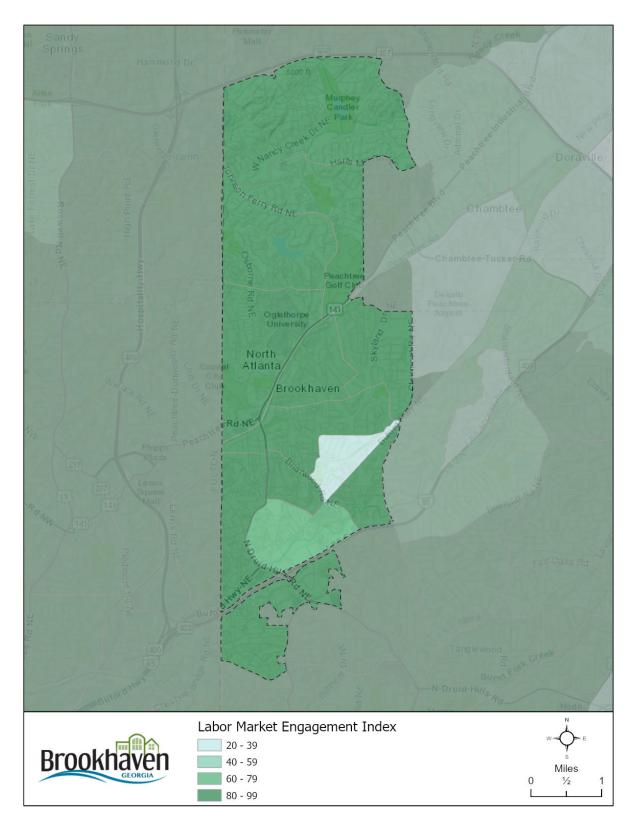
The unemployment rate for women is 72% higher compared to men and 116% higher than men for women with children except for women with children under age 6.

Gender		Labor Force Participation Rate	Unemployment Rate
Male	18,072	94.20%	1.80%
Female	17,615	81.50%	3.10%
Female w/ Children	5,683	75.00%	3.90%
Female w/ Children Under 6	2,373	77.20%	2.00%

Source: 2019 ACS 5-Year Estimates

Figure 6 shows labor market engagement for Brookhaven. The labor market index provides a summary description of the relative intensity of labor market engagement and human capital in a neighborhood. This is based upon the level of employment, labor force participation, and educational attainment in a census tract. Values are percentile ranked nationally and range from 0 to 100. The higher the score, the higher the labor force participation and human capital in the neighborhood. (HUD, HUD USER, 2021)

Figure 6: Labor Market Engagement



Source: HUD eGIS

Occupation and Industry

Table 28: Brookhaven Occupation Population Age 16 and Over

Occupation				
18,872	58%			
4,253	13%			
5,969	18%			
1,952	6%			
1,376	42%			
	4,253 5,969 1,952			

Source: 2019 ACS 5-Year Estimates

Table 29: Industry Population Age 16 and Over

Industry		
Population Age 16 and over	32,422	
Agriculture, forestry, fishing and hunting, and mining	48	0.10%
Construction	2,187	6.70%
Manufacturing	1,620	5.00%
Wholesale trade	1,115	3.40%
Retail trade	2,385	7.40%
Transportation and warehousing and utilities	910	2.80%
Information	1,342	4.10%
Finance and insurance, and real estate and rental and leasing	3,849	11.90%
Professional, scientific, and management, and administrative and waste management services	7,747	23.90%
Education services, and health care and social assistance	5,095	15.70%
Arts, entertainment, and recreation, and accommodations and food services	3,557	11.00%
Other services (except public administration)	1,517	4.70%
Public administration	1,050	3.20%

Commute

Table 30: Commute Times (Workers 16 and over)

Commute Times	Total	Male	Female
Less than 10 minutes	5.70%	5.10%	6.30%
10-14 minutes	10.60%	9.80%	11.60%
15-19 minutes	16.90%	15.30%	18.80%
20-24 minutes	19.10%	19.30%	18.70%
25-29 minutes	9.30%	8.50%	10.20%
30-34 minutes	17.50%	19.40%	15.20%
35-44 minutes	8.40%	8.30%	8.70%
45-59 minutes	7.90%	9.80%	5.50%
60 or more minutes	4.70%	4.50%	4.90%
Mean travel time to work (minutes)	25.8	26.5	24.9
Source: 2019 ACS 5-Year Estimates			

Source: 2019 ACS 5-Year Estimates

Transportation

Table 31: Place of Work

Total	Male	Female
37.20%	33.70%	41.60%
61.70%	64.80%	57.90%
1.00%	1.50%	0.50%
	37.20% 61.70%	37.20% 33.70% 61.70% 64.80%

Source: 2019 ACS 5-Year Estimates

Table 32: Means of Transportation (Workers 16 and Over)

% of Workers 16 and Over	Male	Female
79.20%	80.10%	78.10%
70.10%	69.20%	71.10%
9.10%	10.80%	7.00%
8.80%	10%	7.50%
1.00%	0.60%	1.50%
0.10%	0.10%	0.20%
1.20%	1.20%	1.20%
9.70%	8.10%	11.50%
	79.20% 70.10% 9.10% 8.80% 1.00% 0.10% 1.20%	and OverMale79.20%80.10%70.10%69.20%9.10%10.80%8.80%10%1.00%0.60%0.10%0.10%1.20%1.20%

Source: 2019 ACS 5-Year Estimates

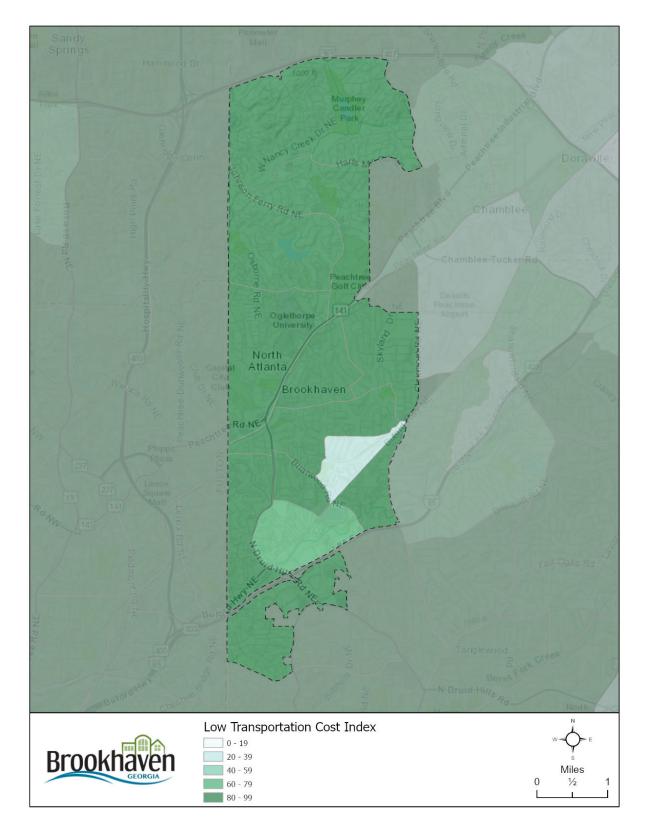


Figure 7: Brookhaven Low Transportation Cost Index

Source: HUD eGIS

Housing Profile

This section provides an overview of housing units in Brookhaven.

Table 33: Households by Tenure

Owner oc	cupied	Renter oc	cupied	Total Households
10,327	48.41%	11,004	51.59%	21,331

Source: 2013 – 2017 CHAS

Homeownership vs. Renter

Table 34: Brookhaven Owner vs. Renter Occupied Housing Units by Race/Ethnicity

	Owner	occupied	Renter	occupied	Total Ho	ouseholds
White	8,495	39.82%	5,235	24.54%	13,730	64.37%
Black or African-American	550	2.58%	1,914	8.97%	2,464	11.55%
Asian	763	3.58%	865	4.06%	1,628	7.63%
American Indian or Alaska Native	25	0.12%	30	0.14%	55	0.26%
Pacific Islander	0	0.00%	10	0.05%	10	0.05%
Other (including multiple races, non-Hispanic)	174	0.82%	220	1.03%	394	1.85%
Hispanic, any race	320	1.50%	2,730	12.80%	3,050	14.30%
Grand Total	10,327	48.41%	11,004	51.59%	21,331	100.00%

Figure 8: Brookhaven Homeownership Rates

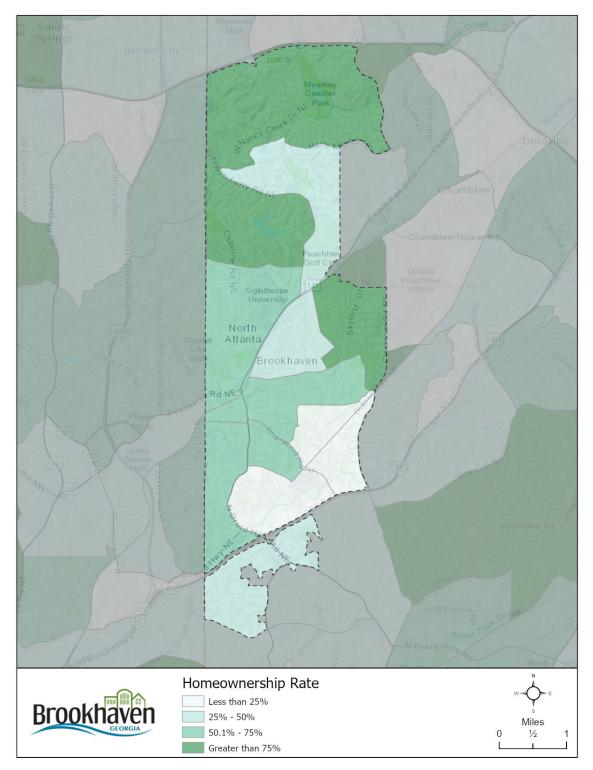
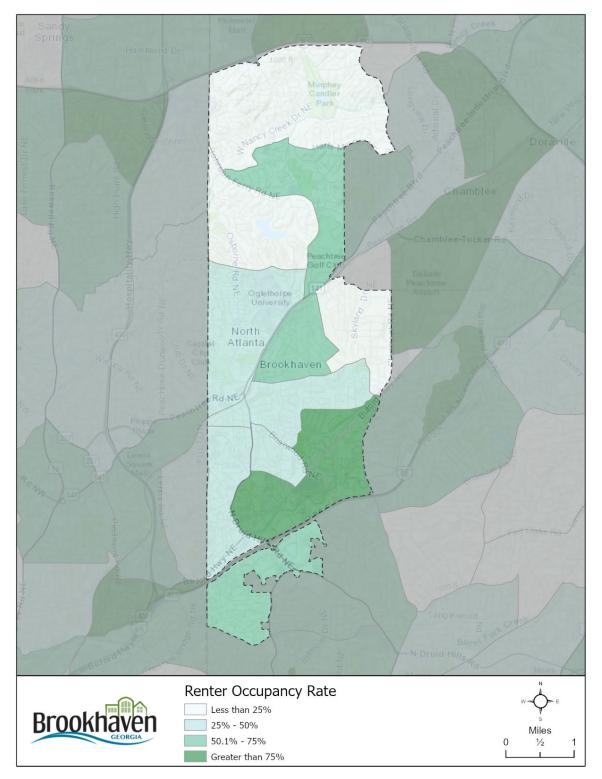


Figure 9: Renter Occupancy Rate



Affordable Housing Cost Burden

HUD defines cost-burdened families as those "who pay more than 30% of their income for housing" and "may have difficulty affording necessities such as food, clothing, transportation, and medical care." Severe cost burden is defined as paying more than 50% of one's income on housing costs. (HUD, PD&R EDGE, 2021)

The Census defines monthly owner costs as the sum of payments for mortgages, deeds of trust, contracts to purchase, or similar debts on the property. It also includes, where appropriate, the monthly condominium fee for condominiums and mobile home costs (Census, 2021).

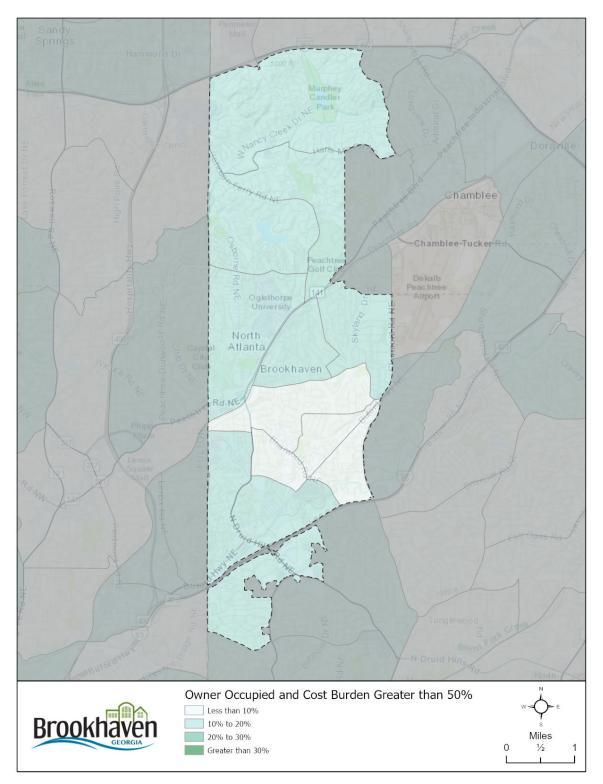
	Household Income							
Housing Cost Burden	Less than 30% AMI	30% to 50% AMI	50% to 80% AMI	80% to 100% AMI	Greater than 100% AMI			
Owner occupied	300	404	644	539	8,423			
Housing cost burden is less than or equal to 30%	10	174	300	330	7,540			
Housing cost burden is 30% to 50%	55	40	74	175	685			
Housing cost burden is greater than 50%	235	190	270	34	198			
Renter occupied	1,569	1,350	1,954	1,185	4,810			
Housing cost burden is less than or equal to 30%	214	115	585	615	4,430			
Housing cost burden is 30% to 50%	145	680	1,054	480	380			
Housing cost burden is greater than 50%	1,210	555	315	90	0			
Total	1,869	1,754	2,598	1,724	13,233			

Table 35: Brookhaven Housing Cost Burden

Table 36: Cost Burden by Household Type

	Housing Cost Burden is 30% - 50%	housing cost burden is greater than 50%	Grand Total
Elderly family (2 persons, with either or both age 62 or over)	4,765	4,370	9,135
Elderly non-family	5,030	6,975	12,005
Large family (5 or more persons)	1,990	935	2,925
Small family (2 persons, neither person 62 years or over, or 3 or 4 persons)	7,985	5,880	13,865
Other (non-elderly non-family)	3,595	3,380	6,975
Total	23,365	21,540	44,905

Figure 10: Severe Homeowner Cost Burden



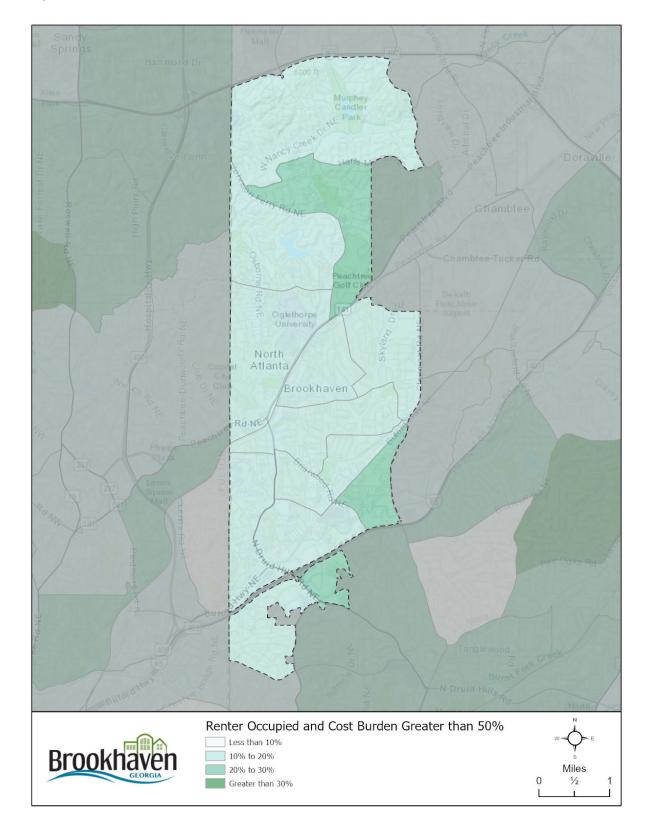


Figure 11: Renter Occupied Cost Burden - Brookhaven

Public and Assisted Housing

The following tables illustrate the number of residents served through housing assistance directly received through HUD.

Table 37: Public Housing by Program Type

	Total	Project -based	Tenant -based
Vouchers in use	608	327	281

	Total	Project -based	Tenant -based
Average Annual Income	0	11,500	11,916
Average length of stay	0	7.4 years	7.6 years
Average Household size	0	1.2	1
# Homeless at admission	0	0	0
# of Elderly Program Participants(>62)	607	327	280
# of Disabled Families	123	45	78
# of Families requesting accessibility features	0	0	0
<pre># of HIV/AIDS program participants</pre>	0	0	0
# of DV victims	0	0	0

Race	Race Vouchers				
	Total	Project -based	Tenant -based		
White	302	210	92		
Black/African American	154	92	62		
Asian	152	25	127		
American Indian/Alaska Native	0	0	0		
Pacific Islander	0	0	0		
Other	0	0	0		

Ethnicity		Vouchers	
	Total	Project -based	Tenant -based
Hispanic	54	40	14
Not Hispanic	554	287	267

HUD sets income limits that determine eligibility for assisted housing programs including the Public Housing, Section 8 project-based, Section 8 Housing Choice Voucher, Section 202 housing for the elderly, and Section 811 housing for persons with disabilities. HUD develops income limits based on Median Family Income estimates and Fair Market Rent area definitions for each metropolitan area, parts of some metropolitan areas, and each non-metropolitan county. Table 38 the income limits for FY 2021 applicable to Brookhaven.

Table 38: Brookhaven HUD FY 2020 Income Limits

FY 2021 I	FY 2021 Income Limits								
		Persons	Persons in Family						
FY 2021 Income Limit Category	Median Family Income (\$86,200)	1	2	3	4	5	6	7	8
Extremely Low (30%) Income Limits		\$18,100	\$20,700	\$23,300	\$26,500	\$31,040	\$35,580	\$40,120	\$44,660
Very Low (50%) Income Limits	-	\$30,200	\$34,500	\$38,800	\$43,100	\$46,550	\$50,000	\$53,450	\$56,900
Low (80%) Income Limits	-	\$48,300	\$55,200	\$62,100	\$68,950	\$74,500	\$80,000	\$85,500	\$91,050

Source: HUD User

Fair Market Rents (FMRs) are used to determine payment standard amounts for the Housing Choice Voucher program, to determine initial renewal rents for some expiring project-based Section 8 contracts, to determine initial rents for housing assistance payment (HAP) contracts in the Moderate Rehabilitation Single Room Occupancy program (Mod Rehab), rent ceilings for rental units in both the HOME Investment Partnerships program and the Emergency Solution Grants program, calculation of maximum award amounts for Continuum of Care recipients and the maximum amount of rent a recipient may pay for property leased with Continuum of Care funds, and calculation of flat rents in Public Housing units. (HUD, Fair Market Rents, 2021)

Final FY 2021 & 2020 FMRs by Unit Bedrooms								
Year	Efficiency	One- Bedroom	Two- Bedroom	Three- Bedroom	Four- Bedroom			
FY 2021 FMR	\$1,016	\$1,040	\$1,185	\$1,491	\$1,823			
FY 2020 FMR	\$996	\$1,025	\$1,167	\$1,489	\$1,824			

Table 39: Brookhaven 2020 Fair Market Rent

Source: HUD User

Conditions

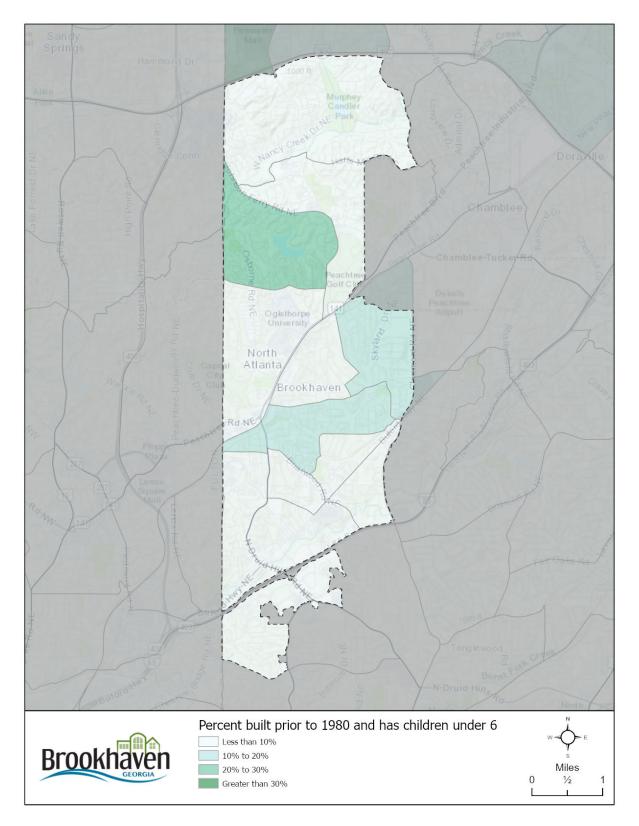
In 1978, the federal government banned consumer use of lead paint. Elevated lead levels are associated with impaired brain and nerve functioning, slowed development in children, behavior problems, and academic underachievement.

Table 40: Year Structure Built

Year Structure Built								
Occupied Units	22,549							
Year Structure Built	% Occupied Units	% Owner	% Renter					
2014 or later	5.30%	6.60%	4.00%					
2010 - 2013	6.40%	5.00%	8.00%					
2000 - 2009	19.40%	21.70%	17.00%					
1980 - 1999	32.40%	29%	36.10%					
1960 - 1979	25.10%	20.50%	29.90%					
1940 - 1959	10.30%	16.00%	4.20%					
1939 or earlier	1.10%	1.30%	0.80%					
1979 or prior	36.50%	37.80%	34.90%					

Source: 2019 ACS 5-Year Estimates

Figure 12: Lead Based Paint Risk



Other Severe Housing Problems

The primary purpose of the Comprehensive Housing Affordability Strategy (CHAS) data is to demonstrate the number of households in need of housing assistance. This is estimated by the number of households that have certain housing problems and have income low enough to qualify for HUD's programs (primarily 30, 50, and 80% of median income). It is also important to consider the prevalence of housing problems among different types of households, such as the elderly, disabled, minorities, and different household types. The CHAS data provides counts of the numbers of households that fit these HUD-specified characteristics in HUD-specified geographic areas.

In addition to estimating low-income housing needs, the CHAS data contributes to a more comprehensive market analysis by documenting issues like lead paint risks, "affordability mismatch," and the interaction of affordability with variables like age of homes, number of bedrooms, and type of building. (HUD, Policy Development & Research - CHAS, 2021)

There are four housing problems in the CHAS data:

- 1. housing unit lacks complete kitchen facilities
- 2. housing unit lacks complete plumbing facilities
- 3. household is overcrowded, and
- 4. household is cost burdened.

	Has 1 or more housing problems	Has no housing problems
Household member has a cognitive limitation	905	415
Household member has a hearing or vision impairment	695	785
Household member has a self-care or independent living limitation	920	575
Household member has an ambulatory limitation	1,375	1,225
Total	3,895	3,000

Table 41: Disabled Households with Housing Problems

Table 42: Housing Problems by Household Size

	Renter occupied	Owner occupied	Total			
	Has 1 or more housing problems					
Household size is 5 or more	740	170	910			
Household type is family, no spouse*	260	10	270			
Household type is married couple family	480	160	640			
Household type is non-family	0	0	0			
Household size is less than 5	4,410	1,835	6,245			
Household type is family, no spouse*	550	100	650			
Household type is married couple family	705	645	1,350			
Household type is non-family	3,155	1,090	4,245			
Total	5,150	2,005	7,155			
Source: 2013 – 2017 CHAS						

Table 43: Severe Housing Problems by Race / Ethnicity

	Has 1 or more	housing problems	Has No problems		
White alone, non-Hispanic	1,605	44.12%	12,030	68.48%	
Black or African-American alone, non-Hispanic	450	12.37%	2,015	11.47%	
Asian alone, non-Hispanic	364	10.01%	1,249	7.11%	
American Indian or Alaska Native alone, non-Hispanic	30	0.82%	25	0.14%	
Pacific Islander alone, non- Hispanic	0	0.00%	10	0.06%	
Other (including multiple races, non-Hispanic)	85	2.34%	295	1.68%	
Hispanic, any race	1,104	30.35%	1,944	11.07%	
Grand Total	3,638	100.00%	17,568	100.00%	
Source: 2013 – 2017 CHA					

Figure 13: Severe Housing Problems

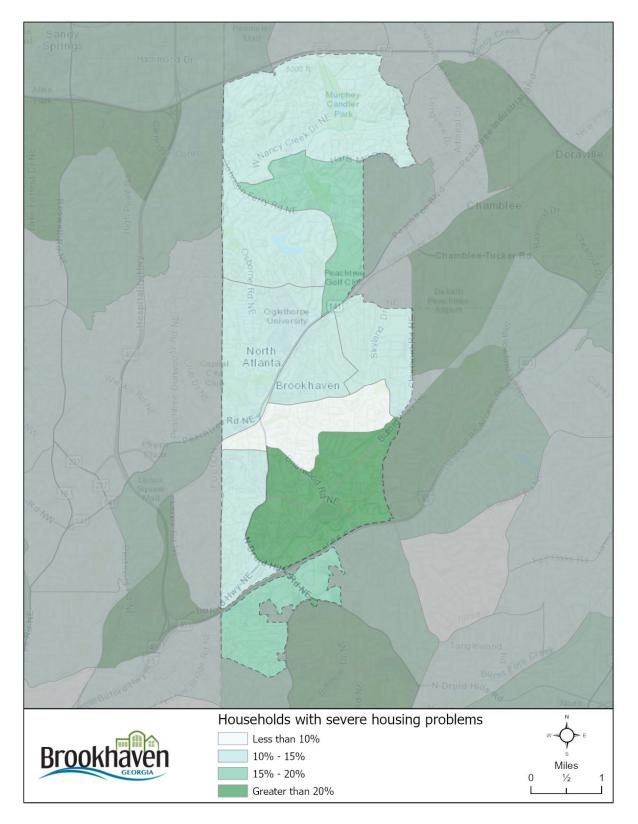


Table 44: Housing Problem Type by Income and Tenure

	Owner occupied	Renter occupied	Grand Total
Less than 30% AMI	5,030	4,930	9,960
Lacking complete plumbing or kitchen facilities	30	245	275
Cost burden 30% to 50%	725	240	965
Cost burden greater than 50%	4,115	3,495	7,610
One to 1.5 persons per room	115	665	780
More than 1.5 person per room	45	285	330
30% to 50% AMI	5,360	5,925	11,285
Lacking complete plumbing or kitchen facilities	35	145	180
Cost burden 30% to 50%	2,220	1,755	3,975
Cost burden greater than 50%	2,780	2,765	5,545
One to 1.5 persons per room	280	880	1,160
More than 1.5 person per room	45	380	425
50% to 80% AMI	7,265	6,100	13,365
Lacking complete plumbing or kitchen facilities	115	395	510
Cost burden 30% to 50%	3,630	3,690	7,320
Cost burden greater than 50%	3,075	980	4,055
One to 1.5 persons per room	430	755	1,185
More than 1.5 person per room	15	280	295
80% to 100% AMI	3,545	1,980	5,525
Lacking complete plumbing or kitchen facilities	65	105	170
Cost burden 30% to 50%	2,190	1,330	3,520
Cost burden greater than 50%	1,110	200	1,310
One to 1.5 persons per room	135	325	460
More than 1.5 person per room	45	20	65
Greater than 100% AMI	6,710	2,160	8,870
Lacking complete plumbing or kitchen facilities	170	175	345
Cost burden 30% to 50%	4,590	1,190	5,780
Cost burden greater than 50%	1,305	200	1,505
One to 1.5 persons per room	505	415	920
More than 1.5 person per room	140	180	320
Grand Total	27,910	21,095	49,005

Publicly Supported Housing

There are two broad categories of publicly supported housing: HUD assisted or supported housing; and non-HUD assisted affordable housing. Non-assisted affordable housing is comprised of units that are income restricted or publicly subsidized but do not receive assistance through a HUD-sponsored program. (Census, 2021)

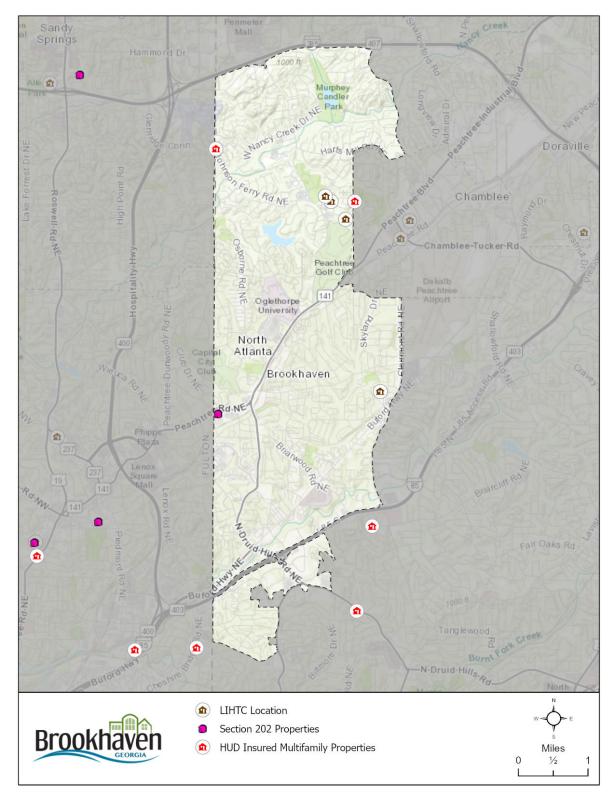
There are relatively few publicly supported housing units in the City of Brookhaven.

Development Name	Total Units	Subsidized Units	Compliance Period Expiration
Lenox Summit	212	212	2021
Bryton Hill Apartments	204	204	2026
Ashford Parkside Landing Senior Residences	117	117	2039

Table 45: Publicly Supported Housing

Figure 15 illustrates the concentration and utilization of the Housing Choice Voucher program. For privacy purposes, only areas with more than 10 housing vouchers are displayed by Census Tract. Very few voucher holders reside throughout the city.

Figure 14: Subsidized Housing Locations



Source: HUD eGIS

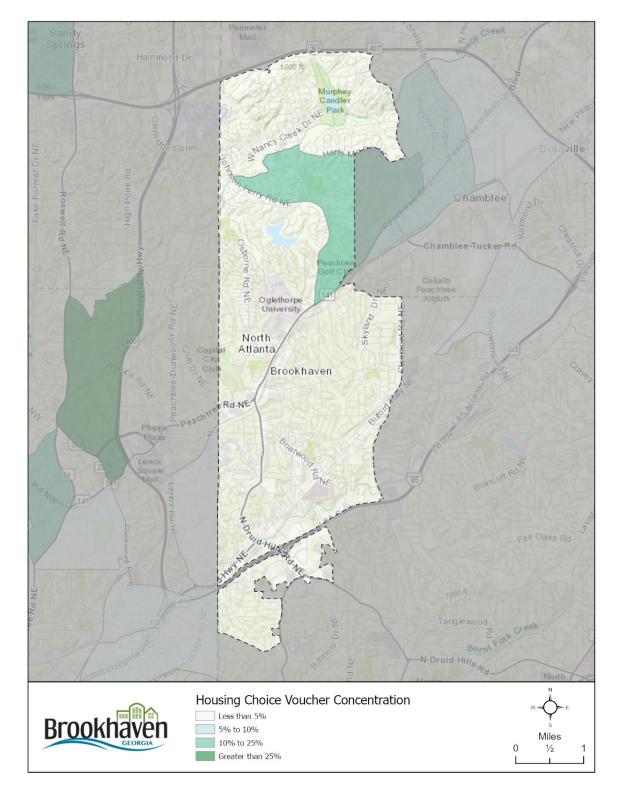


Figure 15: Housing Choice Voucher Concentration

Source: HUD eGIS

Lending

Lending information and analysis was performed by the National Community Reinvestment Coalition (NCRC). NCRC was formed in 1990 by national, regional and local organizations to increase the flow of private capital into traditionally underserved communities. NCRC has grown into an association of more than 600 community-based organizations that promote access to basic banking services, affordable housing, entrepreneurship, job creation and vibrant communities for America's working families. Since Brookhaven is a relatively new City, it is not defined in the HMDA data, therefore the analysis is based on DeKalb County.

This analysis of mortgage lending in Dekalb County, Georgia, uses 2018 and 2019 mortgage data. Unless otherwise indicated, this analysis discusses mortgage loans on 1–4-unit, site-built homes. Reverse mortgages and a small number of outliers are excluded due to missing data on things like the loan purpose or indications that data in the records is erroneous. These exclusions impact less than 1% of loans nationally.

DeKalb County is home to about 716,331 people, according to the FFIEC Census file used by HMDA data. With 30% non-Hispanic white residents, it is a majority-minority county. Of the remainder, Black residents are 53% of the County population, 9% are Hispanic (of any race), and 6% are Asian. Over $\frac{2}{3}$ of residents reside in majority-minority census tracts, and half are in LMI tracts.

DeKalb County,			L	oan Purp	ose		
Action Taken	Home Purchase	Refinance	Cash Out Refi	Home Equity	Home Improvement	NA	Grand Total
Originated	21,823	6,343	6,101	1,819	2,319	67	38,472
Incomplete	1,053	1,087	1,014	224	256	33	3,667
Denied	3,201	2,407	3,243	2,327	3,149	9	14,336
Not accepted	714	436	273	188	270		1,881
Withdrawn	5,923	2,255	2,584	428	527	22	11,739
Purchased	8,040	1,246	1,236	75	56	1,547	12,200
Preapproval Denied	15						15
Preapproval Approved	42						42
Grand Total	40,811	13,774	14,451	5,061	6,577	1,678	82,352

Table 46: Loan Origination Results by Loan Type

Source: NCRC DeKalb County Lending Report 2021

From 2018 to 2019, lenders in DeKalb County reported 38,472 originations. Of those, 56%, or 21,823, were to purchase a home. The vast majority of these, 19,742, were to buy owner-occupied, site-built, 1-4 unit properties. The balance of the loans was a combination of refinance and home equity or home improvement loans. A total of 34,900 loans were made on site built, 1-4 unit owner-occupied homes in all during 2018 and 2019.

The rest of the reported originations were for second homes or investment property (3,454), reverse mortgages (109), multifamily (163), and manufactured homes (8).

Borrower and Neighborhood Income

Of the 34,900 loans on site built, 1-4 unit, owner-occupied homes, almost 29% were made to low or moderate-income borrowers, with 38% in low or moderate-income census tracts. There is a significant overlap in these categories, with 10.019 made to LMI borrowers and 13,242 in LMI tracts. Of those loans, 5,865 were to LMI borrowers and in LMI census tracts.

			Lo	oan Purp	ose		
	Home Purchase	Refinance	Cash Out Refi	Home Equity	Home Improvement	NA	Grand Total
Applications	21,823	6,343	6,101	1,819	2,319	67	38,472
Percent of Applications	56.72%	16.49%	15.86%	4.73%	6.03%	0.17%	100.00%
Second or Investment Homes	2,072	576	564	80	113	49	3,454
Reverse Mortgage Count	4	84	11	9	1	0	109
Multifamily	81	56	12	8	5	1	163
Manufactured Home	5	1	1	0	1	0	8
Sum of Site Built 1- 4 Unit Owner Occupied	19,742	5,681	5,525	1,730	2,204	18	34,900

Table 47: Loans by Property Type

Source: NCRC DeKalb County Lending Report 2021

Home Purchase

Home purchase loans were more likely to be made in LMI tracts than the average loan, with 43% meeting that criteria. LMI borrowers were also more likely to be buying a home. 33% of home purchase borrowers were LMI.

Refinance

Refinance lending is split between traditional refinance loans and cash-out refinance lending. These show different trends with regards to LMI borrowers and LMI tracts. In Dekalb County, just 18% of refinance loans were made to an LMI borrower in 2018 and 2019, while 34% of cash-out refinances reported an LMI borrower.

By comparison, both types' refinance lending was more common in LMI tracts, with 31% of standard refinances, and 35% of cash-out refinances reported in those places.

Home Equity

Home equity lending is traditionally less common among LMI owners and in LMI tracts, and Dekalb is not an exception. LMI borrowers took 18% of home equity (coded as loan purpose

"Other") loans and 17% of home improvement loans. LMI tract lending is a lot more common in this category, with 24% and 26% of these loans in an LMI neighborhood, respectively.

Table 48: Borrower Characteristics

	Loan Purpose						
	Home Purchase	Refinance	Cash Out Refi	Home Equity	Home Improvement	NA	Grand Total
LAR	19,742	5,681	5,525	1,730	2,204	18	34,900
LMI Borrowers	32.60%	18.20%	33.80%	17.80%	16.70%	0.00%	28.70%
LMI Tracts	43.20%	31.10%	35.30%	24.20%	26.00%	22.20%	37.90%
Minority Borrowers	42.80%	34.90%	39.70%	25.00%	28.40%	33.30%	39.20%
Minority Tracts	62.80%	53.40%	61.80%	39.00%	42.80%	27.80%	58.60%

Source: NCRC DeKalb County Lending Report 2021

Generally, this analysis suggests that a substantial number of all loans, except for cash-out refinances made in LMI tracts, are being made to non-LMI borrowers. This could be a sign of creeping gentrification in some places or may be related to other factors

Table 49: Borrower and Neighborhood Characteristics

	Middle and Upper Income Borrower	Low and Moderate Income Borrower	Grand Total
Middle and Upper Income Tract	17,504	4,154	21,658
Low and Moderate Income Tract	7,377	5,865	13,242
Grand Total	24,881	10,019	34,900

Source: NCRC DeKalb County Lending Report 2021

Borrower and Neighborhood Race

Due to the overall demographics and incomes of DeKalb County, lending to minority borrowers and in minority-majority tracts is more common than elsewhere in the country or the Atlanta metro area. This lending is mostly to Black borrowers, but there are sizable shares of loans being made to Asian and Hispanic borrowers.

Table 50: Race / Ethnicity of Borrower

				Loan Purp	oose			
Race/Ethnicity		Home Purchase	Refinance	Cash Out Refi	Home Equity	Home Improvement	NA	Grand Total
Asian	% of Total LAR	9.40%	5.30%	3.10%	5.10%	3.90%	22.20%	7.20%
Asian	LAR	1,555	243	137	75	75	4	2,089
Black	% of Total LAR	34.70%	33.70%	42.50%	20.10%	24.40%	11.10%	34.30%
ыаск	LAR	5,750	1,556	1,880	295	470	2	9,953
Hawaiian or Pacific	% of Total LAR	0.20%	0.10%	0.10%	0.40%			0.10%
Islander (HoPI)	LAR	26	5	4	6			41
Hispanic	% of Total LAR	6.40%	3.40%	3.30%	3.30%	4.00%		5.10%
rispanic	LAR	1,058	158	147	48	76		1,487
Nativo Amorican	% of Total LAR	0.30%	0.40%	0.50%	0.50%	0.20%		0.40%
Native American	LAR	54	18	23	8	4		107
\ A /h:+ a	% of Total LAR	49.10%	57.10%	50.50%	70.60%	67.50%	66.70%	52.90%
White	LAR	8,137	2,631	2,233	1,035	1,299	12	15,347
Crand Tatal	% of Total LAR	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%
Grand Total	LAR	16,580	4,611	4,424	1,467	1,924	18	29,024

Source: NCRC DeKalb County Lending Report 2021

Home Purchase

Of the 19,742 loans made to purchase a home in 2018 and 2019 in DeKalb County, 16,580 reported a borrower's race or ethnicity. The rest indicated that the borrower had refused to offer this information and was initiated via the internet, so the lender was not responsible for inputting this information. Of those that did report race data, 34.7% were made to a Black borrower. This is despite Black residents comprising 53% of the population. Hispanic residents were also less likely to get a home purchase loan in comparison with their share of the population, reporting just 6.4% of home purchase loans while being 9% of the population. Lending to non-Hispanic White and Asian borrowers was more than their population share. Asian borrowers were 9.4% of all home purchase borrowers and 7.2% of all borrowers reported 49% of home purchase originations, despite being just 30% of the county population.

Asian lending is disaggregated by place of origin, as are Hispanic borrowers. Hispanic borrowers are covered later in more detail. About half of Asian borrowers indicated a specific place of origin. Of the Asian home purchase borrowers that offered this information, 35.7% were Asian Indian, with most of the rest either Chinese or Korean. "Other Asian," a classification that means the borrower indicated a place of origin that is not explicitly identified in HMDA, were another 18% of Asian home purchase borrowers.

Some minority borrower groups, predominantly Asian and Hispanic borrowers, were far more likely to be taking home purchase loans instead of refinance or home equity loans. While the countywide data shows 57% of all originations were home purchase loans, among the 2,089 Asian borrowers, that figure was 74.4%, and for Hispanic borrowers, it was 71.1%. Compared to this, Black and non-Hispanic White borrowers purchased a home in 57.8% and 53% of cases, respectively. This could indicate the influx of Asian and Hispanic families into the county. Those groups could have less equity in the homes they own for other reasons that impair their ability to refinance or tap equity despite historically low interest rates during the study period.

Refinance

Refinance lending, particularly cash-out refinance lending, appears to be more equitably distributed by race when compared with the demographic profile. While just 33.7% of refinance loans went to a Black borrower, that group was 42.7% of the borrowers that took a cash-out refinance. This is still less than their share of the county population, but it is far better than the market's standard refinance or home purchase share.

Home Equity

Home equity lending in DeKalb County is firmly dominated by non-Hispanic White borrowers, who were 67.5% of home improvement and 70.6% of home equity borrowers. This may be due to several reasons; greater equity in their homes, fewer lenders offering this product, or higher incomes in general.

Table 51: Asian Lending Details

			Loan Purpo	se					
High Level Race and Ethnicity	Detailed Race		Home Purchase	Refinance	Cash Out Refi	Home Equity	Home Improvement	NA	Grand Total
Asian	Asian Indian	% of Total LAR	35.70%	33.80%	23.50%	39.10%	40.90%	66.70%	35.00%
		LAR	332	52	19	18	18	2	441
	Chinese	% of Total LAR	18.20%	22.70%	18.50%	26.10%	22.70%		19.10%
	Chinese	LAR	169	35	15	12	10		241
	Filipino	% of Total LAR	3.70%	4.50%	12.30%	4.30%	2.30%		4.30%
		LAR	34	7	10	2	1		54
	Japanese	% of Total LAR	3.70%	5.20%	3.70%			33.30%	3.70%
		LAR	34	8	3			1	46
	Korean	% of Total LAR	12.50%	11.70%	17.30%	8.70%	13.60%		12.50%
	Korean	LAR	116	18	14	4	6		158
	Other Asian	% of Total LAR	18.60%	16.20%	11.10%	4.30%	18.20%		17.20%
		LAR	173	25	9	2	8		217
	Vietnamese	% of Total LAR	7.80%	5.80%	13.60%	17.40%	2.30%		8.10%
		LAR	73	9	11	8	1		102
Grand	% of T	otal LAR	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%
Total	L	AR	931	154	81	46	44	3	1,259

Hispanic Lending

Hispanic lending in DeKalb County is highly diverse. This section discusses some of the specific variations in lending across different Hispanic communities in the county.

About half indicated a specific place of origin of the 1,487 originations that listed a Hispanic borrower in the county. HMDA allows the applicant for a mortgage to indicate if they identify as Cuban, Puerto Rican, Mexican, or "other Hispanic." The "other" category is applied when the borrower writes in a specific place, not one of the three enumerated above. Of the borrowers that indicated a particular country of origin, 48.3% listed 'other Hispanic.' This suggests that they are of central or south American heritage. Mexican borrowers were 28.5%, or 216, of the remaining borrowers, followed by Puerto Rican and Cuban.

		Loan Purpose						
			Home Purchase	Refinance	Cash Out Refi	Home Equity	Home Improvement	Grand Total
Hispanic	Cuban	% of Total LAR	7.40%	16.50%	5.30%	13.00%	14.90%	8.90%
		LAR	39	14	4	3	7	67
	Mexican	% of Total LAR	32.60%	23.50%	18.70%	4.30%	19.10%	28.50%
		LAR	172	20	14	1	9	216
-	Puerto Rican	% of Total LAR)	14.40%	15.30%	12.00%	21.70%	10.60%	14.30%
		LAR	76	13	9	5	5	108
	Other Hispanic	% of Total LAR	45.50%	44.70%	64.00%	60.90%	55.30%	48.30%
		LAR	240	38	48	14	26	366
Grand To	tal	% of Total LAR	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%
		LAR	527	85	75	23	47	757

Table 52: Hispanic Lending Detail

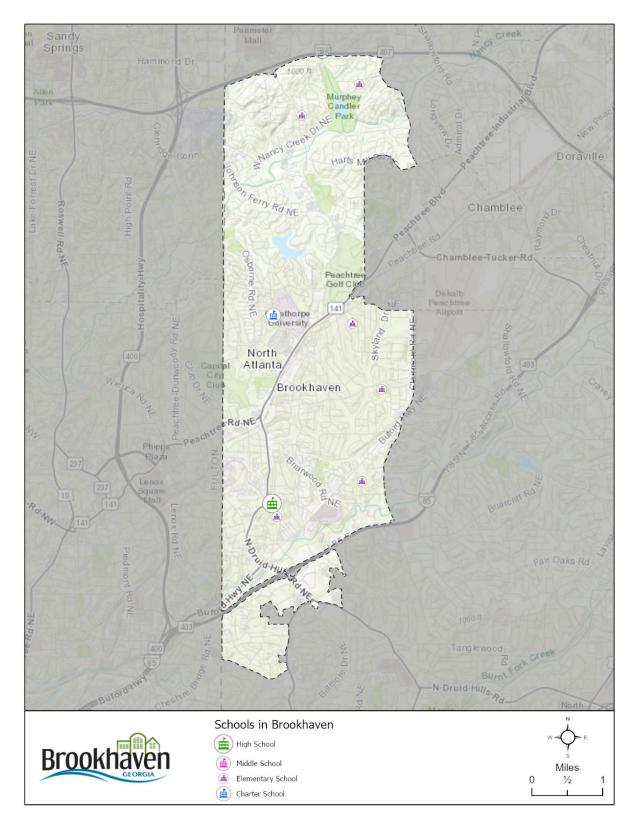
Other Relevant Data

Schools, Education, and Social Services

Table 53: Brookhaven Schools

School Name	Grades	Awards	Score	Grade
Woodward Elementary School	K-5		66.3	D
John Robert Lewis Elementary School	K-5		73.4	С
Kittredge Magnet School (Dunwoody)	4-6	Greatest Gains (Gold)/Highest Performing (Platinum)	98.9	A
Ashford Park Elementary School	K-5		76.6	С
Cross Keys High School	9-12		67.2	D
Montclair Elementary School	K-5		60.1	D
Montgomery Elementary School	K-5		92.4	А
DeKalb PATH Academy Charter School	5-8		80.7	В

Figure 16: School Locations



Source: Dekalb County School District

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Computer/Internet

The COVID-19 pandemic has clearly shown that high-speed internet is necessary as many children were forced into distance learning situations due to closed schools. Classes were held virtually, with many using streaming video technology. Platforms like Zoom and WebEx need high-speed internet to function well. Figure 17 illustrates the percentage of households without internet connections. Lack of internet access will continue to exacerbate the wealth gap between neighborhoods, especially as remote learning and work from home become more the norm, and not the exception. Recent data also reveals that students are struggling in a virtual learning environment which will have long-term economic implications.

Table 54: Internet Access by Income

Income	Number of People	% of People
Less than \$20,000	569	
\$20,000 - \$74,999	1,615	
\$75,000 and up	311	
No internet	3,606	6.80%
No computer	3,118	5.90%

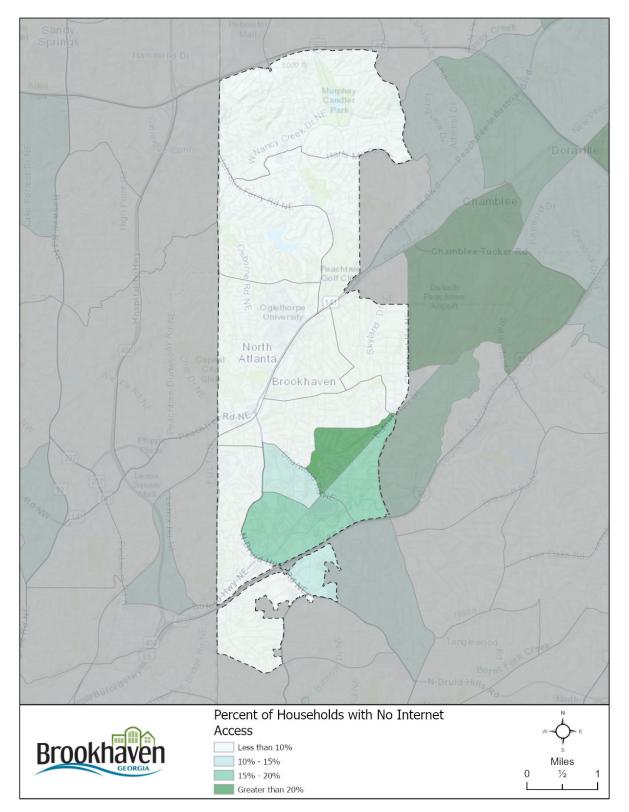
Source: 2019 ACS 5-Year Estimates

Table 55: Internet Access by Race and Ethnicity

No Internet/Computer by Race/Ethnicity	% No Internet	% No Computer
	11.1%	6.2%
White	2.60%	4.10%
Black	11.90%	5.00%
American Indian/Alaska Native	35.30%	20.60%
Asian	2.30%	6.70%
Native Hawaiian/ Pacific Islander	0.00%	42.90%
Some other race	35.90%	10.60%
Two or more races	1.80%	19.70%
Hispanic	20.50%	17.40%

Source: 2019 ACS 5-Year Estimates

Figure 17: Internet Access





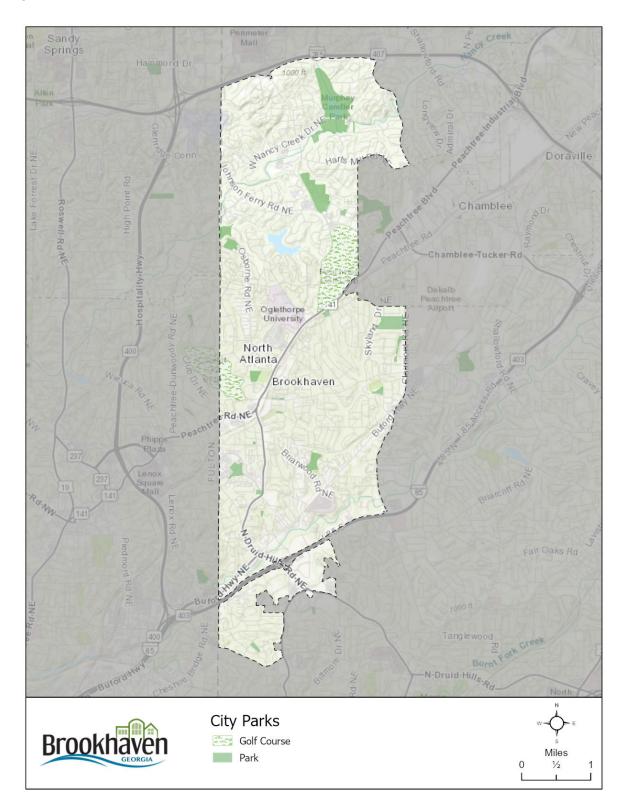
Recreation

Access to parks has been associated with better mental and physical health, lower death rates, and improved social connection. Research has shown that green space may increase physical activity, reduced stress, improved quality of life, and better mental health across different groups of people. (Health, City Health Dashboard, 2021)

Table 56: Brookhaven Parks

Brookhaven Parks
Peachtree Golf Club
Capital City Golf Club
Clack's Corner
Ashford
Parkside
Skyland
Briarwood
Lynwood
Blackburn
Murphey Candler
Blackburn II
Perimeter Trail
Georgian Hills
LaVista Park
Fernwood
Osborne
Ashford Forest Preserve
N Druid Hills Greenspace
Brookhaven
Langford Park
Remington Rd Greenspace
Gail Rd Greenspace

Figure 18: Brookhaven Parks



Small/Micro-Business Development

Table 57: Brookhaven Business Firms

Type of Firm	Total firms	% of Firms		
Total Firms	1,305			
Men-owned firms	806	62%		
Women-owned firms	250	19%		
Minority-owned firms	196	15%		
Nonminority-owned	918	70%		
firms				
Veteran-owned firms	104	8%		
Nonveteran-owned firms	991	76%		
Source: 2017 Annual Business Survey				

Source: 2017 Annual Business Survey

Access to Healthcare

Table 58: Uninsured by Employment Status

Uninsured by Employment Status	Total	% Uninsured
In Labor Force	5,742	18.20%
Employed	5,438	17.70%
Unemployed	304	38.50%
Not in Labor Force	1,078	24.10%
	,	

Source: 2019 ACS 5-Year Estimates

Table 59: Uninsured by Income

Total	% Uninsured
1,871	30.80%
2,116	31.70%
1,950	28.40%
641	11.00%
1,471	5.40%
	1,871 2,116 1,950 641

Source: 2019 ACS 5-Year Estimates

Table 60: Uninsured by Gender

Gender	Total	% Uninsured
Male	4,541	16.70%
Female	3,547	13.40%

Source: 2019 ACS 5-Year Estimates

Table 61: Uninsured by Age

Total	% Uninsured
406	7.10%
1,170	9.40%
98	1.90%
	406 1,170

Source: 2019 ACS 5-Year Estimates

Table 62: Uninsured by Race and Ethnicity

Race/Ethnicity	Number of People	% Uninsured
Total	8,088	15.10%
White	3,995	10.60%
Black/African American	635	10.50%
American Indian/Alaska	1,277	57.60%
Asian	255	8.20%
Native Hawaiian/Pacific Islander	6	100.00%
Some Other Race	1,424	47.80%
Two or More Races	496	30.40%
Hispanic Populations	5,777	47.90%

Source: 2019 ACS 5-Year Estimates

Community Health Needs Assessment

Hospitals are required to conduct a community health needs assessment every three years and adopt an implementation strategy to meet the community health needs to maintain their tax-exempt status. To assess the health needs of its community, a hospital facility must identify the significant health needs of the community. It must also prioritize those health needs and identify resources potentially available to address them. Resources can include organizations, facilities, and programs in the community, including those of the hospital facility, potentially available to address these health needs.

The health needs of a community include requisites for the improvement or maintenance of health status, both in the community at large and parts of the community, such as particular neighborhoods or populations experiencing health disparities. Needs may include, for example, the need to:

- Address financial and other barriers to accessing care,
- Prevent illness,
- Ensure adequate nutrition, or
- Address social, behavioral, and environmental factors that influence health in the community.

The four major healthcare systems in the Atlanta area are Emory Healthcare, WellStar Health System, Piedmont Healthcare, and Grady Health System. Piedmont considers their service community to be Fulton County and was not included in the analysis of the assessments.

Emory Healthcare

Emory completed the most recent CHNA in 2019. The CHNA process access the needs of the community served by the system as a whole. Community stakeholders identified the following major health challenges impacting residents in the system's service area.

- Common health issues
 - Diabetes (type I and II)
 - Obesity (adult and child)
 - Asthma
 - Respiratory issues among homeless populations (COPD and asthma)
 - Infectious disease (HIV, syphilis, gonorrhea, chlamydia, and Hepatitis C)

- > Infant mortality
- Cardiovascular diseases
- > Hypertension
- > Stroke
- Cancer (Lung, colon, gastric, breast)
- Kidney disease
- Behavioral health challenges, including substance abuse
 - High prevalence of untreated/undiagnosed mental issues (depression, anxiety, serious mental illness)
 - Self-harm/suicide
 - Substance abuse and overdose (opioid/heroin, alcohol, marijuana, cocaine, and methamphetamines)
- Overutilization of the emergency room (medical and behavioral health needs)
- Undocumented women showing up in labor having received no prenatal care
- Poor dental health among uninsured
- Disparities for Black and Latino residents
- High rates of teen pregnancy
- Smoking

The following were listed context and drivers that impact the health of residents:

- Geographic location
- Access to care need for affordable healthcare
- Awareness of what services are available and where they are located
- Behavioral health services barriers related to social/cultural stigma
- Dental care and other services for uninsured

- Substance abuse services
- Poor socioeconomic status
- Education
- Racial and ethnic challenges
- Housing issues
- Poor nutrition
- Residents do not always make healthy choices related to parenting, physical activity, nutrition, etc.

Community stakeholders indicated residents that identify with the following populations as atrisk:

- African American and Hispanic residents
- Uninsured and underinsured
- Previously incarcerated
- Undocumented residents
- Immigrants (Hispanic and African)
- Homeless residents
- People diagnosed with behavioral health challenges or chronic disease
- Single parents
- People experiencing low socioeconomic status (poverty and education)
- Children
- Seniors on a fixed income
- Residents without access to transportation

Stakeholders also provided input on what improved since the last study, what stayed the same, and areas of decline.

Improved

- The economy is improving, which translates into better access to care for some people
- Health has improved for those with access to increased employment opportunities
- Increase in preventive care that is available at Southside Medical Center and Center Pan-Asian Community Services
- New health care facilities have opened and others have expanded
- Increase in the number of Federally Qualified Health Centers (FQHCs)
- Some schools are addressing mental health needs
- More people are insured
- New workout facilities in some areas

Stayed the Same

- Lack of services and high costs have remained unchanged for many residents
- Not enough clinics and FQHCs to meet the demand for affordable care in some communities
- No improvements over time in resources or outcomes for underinsured and uninsured
- Limited access to care for uninsured residents remains unchanged in many communities
- No improvements in chronic diseases (hypertension, cardiovascular disease, stroke, diabetes, and STDs)
- Disparities in the health outcomes and access to care remain
- Social determinants of health are not being addressed in all parts of all counties

Declined

- Not enough local data available to assist with decision-making (e.g., the health disparities that exist between populations within counties muted in county level-data)
- For residents remaining in poverty, health has declined
- Premiums and medications are unaffordable
- Residents are uninsured and not seeking care
- Racial and ethnic disparities have become worse in some communities
- Access to behavioral health service

The assessment identified the following priorities for each hospital affiliated with the system. The priorities listed below were the priorities identified in the previous assessment.

- Access to Care & Community Collaboration
- Health Education & Literacy
- Preventative Care & Chronic Disease Management (Healthcare, 2021)

Grady Health System (GHS)

The GHS most recent CHNA was conducted in 2019 for the years 2020-2022. The assessment indicated that it was important to note the following:

- The southeastern region of the United States tends to have worse health outcomes when compared national benchmarks for mental health, cardiovascular disease, maternal and child health, insurance, income, education, and racial and ethnic disparities.
- The demographics of GHS's patient population may influence the health outcomes and number of health needs found in this assessment. The majority of GHS's revenue is generated through Medicare and Medicaid reimbursement, and millions of dollars in indigent and charity care are provided each month. Much of GHS's community experiences above average socioeconomic barriers to accessing healthcare, and their health is influenced by social determinants, such as economic insecurity, low education attainment, unemployment, limited English speaking skills, among others.

The assessment identified the following significant community health needs:

- 1. Social Determinants of Health: Economic Security, Housing, Food Access, Educational Attainment, and Transportation
- 2. HIV and STIs
- 3. Violence and Injury
- 4. Substance Use
- 5. Maternal and Child Health
- 6. Respiratory Health
- 7. Metabolic Syndrome (Cardiovascular and Diabetes)
- 8. Behavioral Health
- 9. Cancer
- 10. Access to Care

The study noted the following trends when comparing the current study to previous:

Improvements

- Cancer incidence and mortality rates
- Number of providers generally, thought safety net providers remain low
- Poverty, though the rate remains slightly higher than ten years ago
- Unemployment
- Insurance rates, but there is no measure of the rate of under insurance

Worsened

- Cardiovascular conditions
- Maternal and child health
- Obesity

- Human immunodeficiency virus (HIV) and STIs
- Substance abuse and overdose
- Violence and injury
- Inequities

The assessment indicated that residents in the service tend to be younger, more diverse, have a higher income, and more education compared to the state. However, certain populations experience barriers to being healthy. The study indicated the following populations need to be the focus of further investment:

- Black and Latino residents
- Single parents
- People without legal immigration status, and
- Residents from the southern half of the service area in specific zip codes that are not located in Brookhaven

Grady conducts it's CHNA in partnership with Atlanta Regional Collaborative for Health Improvement (ARCHI) is an interdisciplinary coalition working to improve health in the region through a collaborative approach to community health needs assessment and development of key initiatives to improve health. Through a data driven model, ARCHI determined the key levers through investment and collaboration that will have the greatest, positive impact on the community overall:

- Adopting healthy behaviors
- Care coordination
- Pathways to advantage for students and families
- Insurance expansion (System G. H., 2021).

WellStar

WellStar conducted the last CHNA in 2019 for Atlanta Medical Center and WellStar Atlanta Medical Center South. The following priorities were identified:

- Obesity
- Access to appropriate care
- Behavioral healthcare (including substance abuse)
- Educational awareness
- Equitable revitalization, employment and job training

Th assessment found that many community members do not have access to the most appropriate care to meet their needs due insurance status, residents' ability to navigate available services, number of providers, quality of care and transportation. The study identified specific populations that have greater barriers to being healthy including people without legal immigration status, Blacks and Latinos and single parents. The geographic areas identified as higher risk were not in Brookhaven (System W. H., 2021).

Section 3: Identification of Impediments to Fair Housing Choice Public and Private Sector

Public Sector

Public sector policies and practices have the potential to negatively impact housing choice of individuals and should be reviewed to examine if implementation has created barriers to housing choice. This section evaluates the public and private sector policies that may impact fair housing choice including, but not limited to zoning and land development codes, infrastructure and transportation policies, property tax and other tax policies, and efforts to expand the supply of affordable housing in the jurisdiction.

Zoning and Site Selection

The City of Brookhaven's zoning regulations are proactive in encouraging the development of affordable housing and siting such housing along transit routes and areas with proximity to job access. The current zoning code has inclusive housing requirements for proposed developments with more than 10 units. Additionally, density bonuses are provided in specific areas to encourage multi-family development and mixed-use developments. While Brookhaven is a new City, its zoning code is progressive in its efforts to permit and encourage affordable and accessible housing.

Planning and Land Use Boards

The city has several committees dedicated toward fostering equitable and inclusive developments such as the affordable housing task force and the social justice subcommittee. However, Brookhaven does not formally track the demographic composition of appointed board members on committees which have influence over planning, land use and subdivision regulations. Having committee members that represent various social and economic classes can bring important perspectives when discussing future land use priorities, or making recommendations on proposed development projects. Planning and Land Use Boards should be representative of the whole community, and tracking members' racial, ethnic and economic characteristics helps ensure board membership is diverse, and aids in recruiting new board members.

Homeless and Special Needs Housing

The Salvation Army operates a day-time shelter in Brookhaven that serves a portion of DeKalb County's homeless families and individuals. Additionally, CHAS data estimates there are approximately 114 households that are living in overcrowded conditions <u>and</u> have a subfamily (non-related) member living with them. Households with subfamilies and living in overcrowded conditions is an indicator of households who are at risk of homelessness or who may be homeless such as a youth staying in a friend's basement or sleeping on their couch. Homeless and special needs housing policy and programs are largely overseen by the DeKalb County Continuum of Care (CoC) members. Brookhaven has not historically been an active member, but as a new entitlement community, Brookhaven should become active members in the CoC to ensure there is coordination and consultation on programs and policies that affect Brookhaven's vulnerable populations and active social service agencies.

Household Security and Stability

Disproportionately greater need is defined as when the percentage of person in a category of need who are members of a particular racial or ethnic group is at least 10 percentage points higher than the percentage of persons in the category as a whole. Analysis of Census data concludes extremely low, very low and low-income Hispanic households have a disproportionately greater housing need. Moderate income Black households have a disproportionate housing need. Housing cost burden is the most prevalent housing problem

given Brookhaven's high rent and home purchase costs. Brookhaven should develop programs and strategies that strengthen household security and stability for minority populations and lowincome neighborhoods. Strategies should focus on reducing barriers to work such as affordable childcare, job skills and workforce development, and improving transportation linkages between low-income neighborhoods and job centers.

Publicly Assisted Housing / Voucher Holders

There are relatively few publicly assisted housing developments in Brookhaven and the preservation of those units should be a priority. One of the assisted developments will conclude its compliance period in 2026. Brookhaven staff should work with the building owner to syndicate the tax credits to preserve those affordable units for an additional 30-years.

Additionally, the analysis of Housing Choice Voucher (HCV) concentrations in Brookhaven indicates HCV utilization is low and could be improved. Only one tract in Brookhaven had more than 10 voucher holders, despite the high number of rental properties in and around the Buford Highway corridor. This lack of voucher holders indicates that either there are not enough HCV in DeKalb County and/or many landlords in low-and moderate-income neighborhoods are unwilling to accept Housing Choice Vouchers. Little can be done about the number of available vouchers. However, Brookhaven should work with apartment owners, owner associations and the public housing authority to educate and encourage voucher acceptance. Increasing the number of apartments willing to accept HCV could lower the number of cost burdened households in the city.

Private Sector

Lending Policies and Practices

Since Brookhaven is a new city, HMDA data is not aggregated to the city-level and therefore the analysis was performed at the county-level. City-level data should be available starting with the 2020 HMDA release. Analysis of the data did not indicate any patterns of lending discrimination among minority homebuyers in DeKalb County. In fact, DeKalb County has one of the highest minority lending rates in the country.

The HMDA data did show a high proportion of middle and upper-income borrowers receiving loans for properties in low-income neighborhoods. This could be an indication of possible gentrification with higher-income homeowners moving into low-income neighborhoods, potentially displacing low-income residents. Brookhaven should monitor HMDA data for signs of gentrification pressures and develop programs to assist low-income and/or minority residents with purchase assistance for those interested in becoming homeowners.

Fair Housing Enforcement

Federal

It is illegal to discriminate in the sale or rental of housing, including against individuals seeking a mortgage or housing assistance, or in other housing-related activities. The Fair Housing Act prohibits this discrimination because of race, color, national origin, religion, sex, familial status, and disability. In February of 2021, fair housing protections were extended by executive order to cover sexual orientation and gender identity. (HUD, Press Releases, 2021) A variety of other federal civil rights laws, including Title VI of the Civil Rights Act, Section 504 of the Rehabilitation Act, and the Americans with Disabilities Act, prohibit discrimination in housing and community development programs and activities, particularly those that are assisted with HUD funding. These civil rights laws include obligations such as taking reasonable steps to ensure meaningful access to their programs and activities for persons with limited English proficiency (LEP) and taking appropriate steps to ensure effective communication with individuals with

disabilities through the provision of appropriate auxiliary aids and services. Various federal fair housing and civil rights laws require HUD and its program participants to affirmatively further the purposes of the Fair Housing Act. HUD's Office of Fair Housing and Equal Opportunity (FHEO) works to eliminate housing discrimination and promote civil rights and economic opportunity through housing. FHEO enforces fair housing laws, including investigating complaints of discrimination. (HUD, FHEO, 2021)

A Fair Housing Assistance Program (FHAP) is an intergovernmental enforcement partnership between HUD and the state or local agencies. As in any partnership, both parties must contribute to the success of the program. The Fair Housing Act contemplates that, across the country, state and local governments will enact and enforce their own statutes and ordinances that are substantially equivalent to the Fair Housing Act. HUD provides FHAP funding annually on a noncompetitive basis to state and local agencies that administer fair housing laws that provide rights and remedies that are substantially equivalent to those provided by the Fair Housing Act. A state or local agency may be certified as substantially equivalent after it applies for certification and HUD determines that the agency administers a law that provides substantive rights, procedures, remedies and judicial review provisions that are substantially equivalent to the Fair Housing Act. A substantially equivalent agency's law may include additional protected classes. Typically, once certified, HUD will refer complaints of housing discrimination that it receives to the state or local agency for investigation. (HUD, Fair Housing Assistance Program, 2021) The Florida Commission on Human Relations serves as the FHAP agency for the area. Information on FHAP cases will be discussed in Section 3. (HUD, Fair Housing Assistance Program, 2021)

Fair housing organizations and other non-profits that receive funding through the Fair Housing Initiatives Program (FHIP) assist people who believe they have been victims of housing discrimination. FHIP organizations partner with HUD to help people identify government agencies (FHAPs) that handle complaints of housing discrimination. They also conduct preliminary investigation of claims, including sending "testers" to properties suspected of practicing housing discrimination. In addition to funding organizations that provide direct assistance to individuals who feel they have been discriminated against while attempting to purchase or rent housing, FHIPs also have initiatives that promote fair housing laws and equal housing opportunity awareness. (HUD, Fair Housing Initiatives Program, 2021)

Noncompliance by HUD

No areas of noncompliance were identified.

Section 4: Assessment of Current Public and Private Fair Housing Programs and Activities in the Jurisdiction

Evaluation of Jurisdiction's Current Fair Housing Legal Status Fair Housing Complaints and Compliance Reviews

Brookhaven had a total of four (4) fair housing complaints between 2016-2020. The limited number of data does not provide enough information to determine whether or not discrimination is prevalent in the city. However, a growing community should be proactive in ensuring residents have equal access to quality housing and other amenities that support a strong community.

Table 63: 2016 - 2020 Fair Housing Complaints by Basis

Basis	2016	2017	2018	2019	2020	Total	% of Total Cases
Race				1	1	2	50%
Color						0	0%
Religion						0	0%
National Origin					1	1	25%
Sex						0	0%
Familial Status						0	0%
Disability			1			1	25%
Retaliation						0	0%
Total Cases	0	0	1	1	2	4	

Source: HUD MicroStrategy Report

Table 64: 2016 – 2020 Fair Housing Complaints by Disposition

Disposition	2016	2017	2018	2019	2020	Total	% of Total Cases
No Cause				1		1	25%
Probable Cause						0	0%
Conciliation						0	0%
Dismissed - Jurisdiction						0	0%
Judicial Dismissal						0	0%
Complainant Failed to Cooperate						0	0%
Withdrawn			1			1	25%
Unable to locate Complainant				1		1	25%
Lack of Jurisdiction					1	1	25%
Total	0	0	1	2	0	4	

Source: HUD MicroStrategy Report

Section 5: 2021-2025 Fair Housing Action Plan

Impediment	Activity	Responsible Party			
Impediment 1: Disparity in housing needs and affordable housing throughout Brookhaven					
1.1 There are signs of gentrification with higher income families moving into lower income areas.	1.1.a Proactively develop policies that will retain affordable housing in those	Brookhaven			
	1.1.b Develop an evaluation tool to monitor planning and public investments by local and regional entities and advocate for opportunities to provide public infrastructure and projects that promote housing choice in areas of opportunity.	Brookhaven			
1.2 There is very low utilization of Housing Choice Vouchers in Brookhaven, especially in lower income areas. landlords.	1.2.a Partner with the PHA on education and outreach to landlords. application process.	Brookhaven, Housing Authority of Dekalb County			
	1.2.b Provide assistance to agencies to assist residents and potential residents with completing Housing Choice Voucher applications.	Brookhaven			
1.3 Market forces may encourage affordable housing owners to convert to market rate housing after the required compliance period.	1.3.a Monitor compliance expiration dates and proactively work with developers to maintain the affordable housing inventory.	Brookhaven			

Impediment	Activity	Responsible Party			
Impediment 2: Disparity in homeownership among Blacks and Hispanics when compared to Whites					
2.1 Significant disparities exist between White homeownership and homeownership among Black and Hispanics.	2.1.a Develop an affirmative marketing program for housing opportunities that provide outreach to income- and mortgage-eligible households seeking homeownership, with a focus on the segments of the population that may be less likely to apply for affordable housing.	Brookhaven, financial institutions			
	2.1.b Develop a local banker's council to discuss products and marketing tools to promote homeownership.	Brookhaven, financial institutions			
	2.1.b Require that all developers involved with affordable housing funds provide an affirmative fair housing marketing plan.	Brookhaven			
Impediment 3: Unequal access to opportunity					
3.1 Income inequities exist between women and men and Blacks and Whites and Hispanics and Whites.	3.1.a Fund workforce development programs that support bridging the gaps in access and opportunity to address wage disparities and support systems for women to enter and stay in the workforce.	Brookhaven			

Impediment	Activity	Responsible Party
3.2 Disparities exist between White business owners and minority and women-owned businesses.	3.2.a Provide support for technical assistance programs and organizations that provide capital to support business start-ups and scaling businesses.	Brookhaven
3.3 Significant disparity in educational attainment at all levels among Hispanics when compared to the rest of the population. There is also a disparity between Blacks and Whites with a bachelor's or higher.	3.3.a Support career development programs in industries that will ensure an equitable living wage that exceeds the poverty level increase educational attainment for Blacks and Hispanics. Programs should also provide support for childcare services.	Brookhaven
3.4 COVID-19 made access to internet a necessity for households.	Resources should be committed to ensure all families have a computer and internet access.	Brookhaven
3.5 Community health needs assessments and data show access to healthcare is a concern for Blacks, Hispanics, single parents, and low-income populations.	Provide funding to agencies to conduct outreach and provide assistance completing the ACA application process during open enrollment periods.	Brookhaven

Impediment	Activity	Responsible Party			
Impediment 4: Segregated living patterns could lead to creating R/ECAP concentrated areas of poverty for Hispanics					
4.1 Data indicates that the Hispanic population is concentrated in the Southern part of the city, which could lead to a R/ECAP designation.	4.1.a Develop an evaluation tool to monitor planning and public investments by local and regional entities and advocate for opportunities to provide public infrastructure that promotes housing choice in areas of opportunity.	Brookhaven			
	4.1.b Proactively by maintain a testing contract with Metro Fair Housing Services.	Brookhaven, Metro Fair Housing Services			

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