

2018 Tennessee Analysis of Impediments to Fair Housing Choice

Update to the 2013 Report

Prepared by:

**Tennessee Housing Development Agency
Division of Research and Planning**

Introduction

The Housing and Urban Development (HUD) agency requires states receiving federal funds under the Community Development Block Grant (CDBG), the HOME Investment Partnerships (HOME), the Emergency Solutions Grants (ESG) program, Housing Trust Fund (HTF) program, and the Housing Opportunities for Persons with HIV/AIDS (HOPWA) program to submit an Analysis of Impediments to Fair Housing Choice as part of a HUD certification to affirmatively further fair housing (AFFH). This certification occurs every five years. Fair housing concerns are also addressed Consolidated Planning documents.

This plan was last completed in 2013 by Western Economic Services, LLC. The following document will serve as a small companion update to the 2013 analysis as preparation for a full review and analysis in 2019 to better prepare and inform the 2020-2024 State of Tennessee Consolidated Plan. The Consolidated Plan is a statewide needs assessment and market analysis to respond to affordable housing and community development needs.

This update utilized a brief survey and data collection efforts to detail current fair housing issues in Tennessee. The number of survey respondents was small so we will conduct a more robust survey in the next round. Quantitative data included HMDA (Home Mortgage Disclosure Act) and Tennessee Human Rights Commission (THRC) data and summarizes home loan disparities for racial and ethnic groups as well as fair housing discrimination complaints. Additionally, this update includes the whole of the state instead of just non-entitlement jurisdictions. Many entitlement districts do their own Consolidated Plans and Analyses of Impediments. We encourage you to visit those plans for detailed information. Because this report include the whole state, we have also included data and maps of Tennessee counties.

Much of the home purchase loan data overlaps with THDA's [2016 HMDA Report](#). You can visit this report for more detailed analysis and sources.

Home Purchase Loans

HMDA (Home Mortgage Disclosure Act) data was collected for the State of Tennessee from 2007 through 2016. The following tables and maps detail types of loans requested, loans denied, reasons and demographics. The end of the section details HALs, or high annual percentage rate loans. Maps are included throughout to show the counties and census tracts in regards to denials and HALs and by all applicants, black applicants, and Hispanic applicants.

Visit page 73 of the [2013 AI report](#) for additional information and definitions about reporting criteria.

Table 1 below shows the number of loan applications reported by participating institutions for home purchases, refinancing, and home improvements for 2007-2016. Of the 1,615,213 total originated loans, 703,453 were for home purchases.

Table 1, Purpose of Loan by Year, 2007-2016

	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	Total
Home Purchase	109,089	68,014	58,509	51,531	48,691	57,175	66,207	71,069	81,942	91,226	703,453
Refinance	83,347	77,133	115,722	89,818	77,683	111,247	92,850	45,902	59,199	67,098	819,999
Home Improvement	15,171	10,865	8,089	7,080	6,793	7,241	8,126	8,145	9,196	11,055	91,761
Total Originated Loans	207,607	156,012	182,320	148,429	133,167	175,663	167,183	125,116	150,337	169,379	1,615,213

Source: HMDA

Table 2 details home purchase loans for all applications between 2007-2016. Not owner occupied home purchase loan applications have steadily been increasing since they fell after the recession. For the purposes of this report, we will be focusing on owner-occupied, 1-4 family home purchase loans that have followed the same trend.

Table 2, Occupancy Status for Home Purchase Loan Applications, 2007-2016

	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Owner-Occupied	192,570	116,803	111,716	102,495	101,672	115,071	130,047	126,472	138,797	155,737
Not owner-occupied	29,597	16,995	10,589	9,842	9,938	11,103	12,015	12,734	14,425	15,761
Not applicable	807	552	330	155	123	146	157	159	292	310
ALL	222,974	134,350	122,635	112,492	111,733	126,320	142,219	139,365	153,514	171,808

Source: HMDA

As seen in table 3, loans increased from the previous year but have remained relatively steady since 2010. Denial rates for home purchase loans have also steadily decreased since a high in 2012.

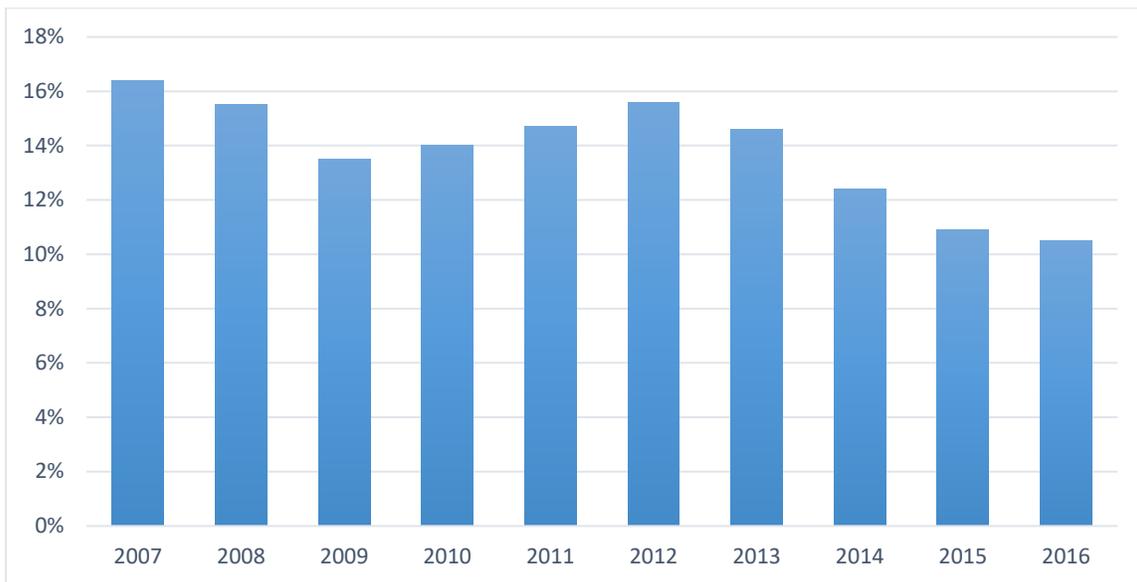
Table 3, Loan Applications by Action Taken (All Loans), 2007-2016

	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Loan originated	217,392	163,188	187,776	153,282	137,943	180,686	172,612	130,220	155,616	174,965
Application approved but not accepted	31,535	17,250	15,309	13,542	16,217	17,770	18,740	11,694	11,328	12,115
Application denied by financial institution	118,017	82,289	58,453	54,265	52,990	61,081	63,109	49,422	52,142	61,957
Application withdrawn by applicant	43,623	33,151	37,312	31,073	27,097	34,147	30,548	22,939	27,483	34,078
File closed for incompleteness	14,219	7,872	8,887	7,592	7,720	9,244	10,388	6,622	11,591	15,563
Loan purchased by the institution	87,303	62,082	98,182	76,159	62,409	70,407	62,960	41,885	46,912	51,767
Preapproval request denied by financial institution	19	7	109	4	1	15	43	17	25	36
Preapproval request approved but not accepted	9	0	0	0	0	12	54	22	17	9
Total	512,117	365,839	406,028	335,917	304,377	373,362	358,454	262,821	305,114	350,490
Overall Denial Rate	23.04%	22.49%	14.40%	16.15%	17.41%	16.36%	17.61%	18.80%	17.09%	17.68%
Owner Occupied Home Purchase Loans Denial Rate	16.4%	15.5%	13.5%	14.0%	14.7%	15.6%	14.6%	12.4%	10.9%	10.5%
Owner Occupied Refinance Loans Denial Rate	44.2%	39.7%	24.3%	26.4%	26.8%	22.6%	26.8%	34.2%	30.8%	33.6%

Source: HMDA

Figure 1 shows a recent overall decrease in the rate of home mortgage loan denials for all applicants.

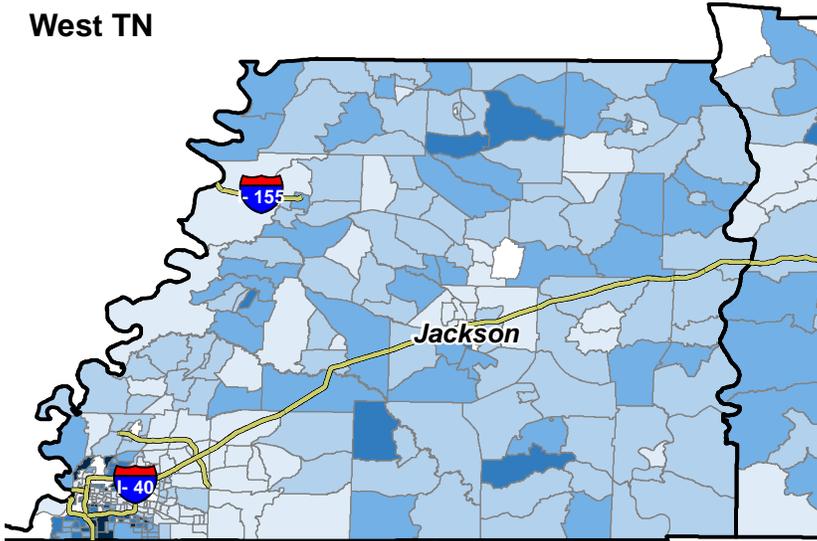
Figure 1, Denial Rates by Year, 2007-2016



Source: HMDA

Map 1 and Map 2 on the following pages show the distribution of denials for all applicants by census tract and county, respectively. Average denials were not evenly distributed, with several rural areas experiencing a rate above the disproportionate share threshold of 24.9 percent. Polk County experienced the highest rate of mortgage denials at a rate of over 51 percent, although it is worth noting that Polk County had fewer than 400 originated loans over the five year period.

West TN

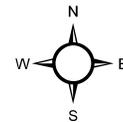
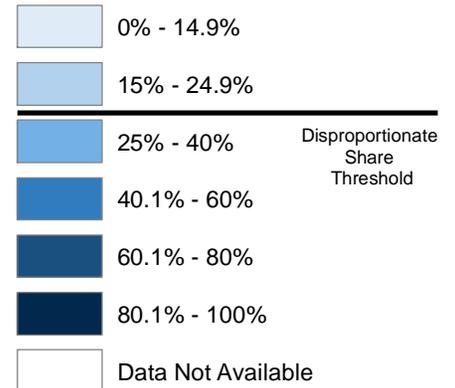


Map 1 2012-2016 Denial Rates by Census Tract

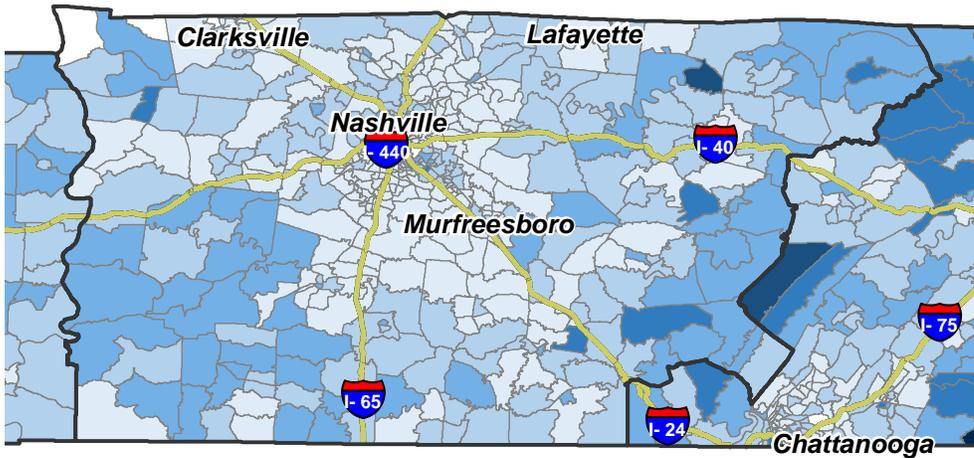
2012-2016 Average Denial Rate for All Applicants in Tennessee =14.9%

Disproportionate Share Threshold =24.9%
(A disproportionate Share exists when the share of a population in a given area is at least 10 percentage points greater than the study area average.)

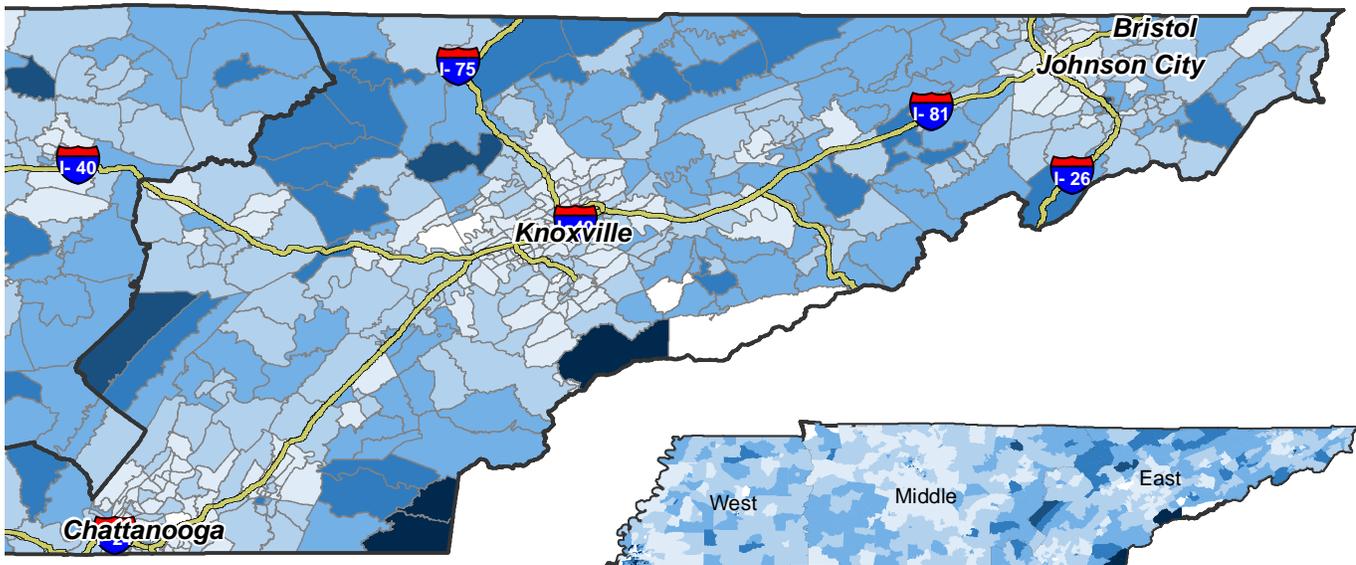
% of Applicants Denied



Middle TN



East TN



West TN

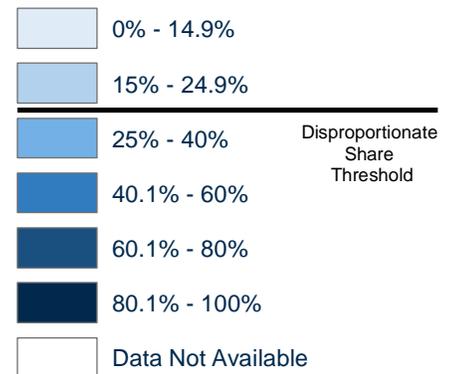


Map 2 2012-2016 Denial Rates by County

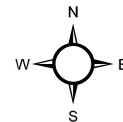
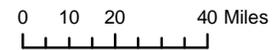
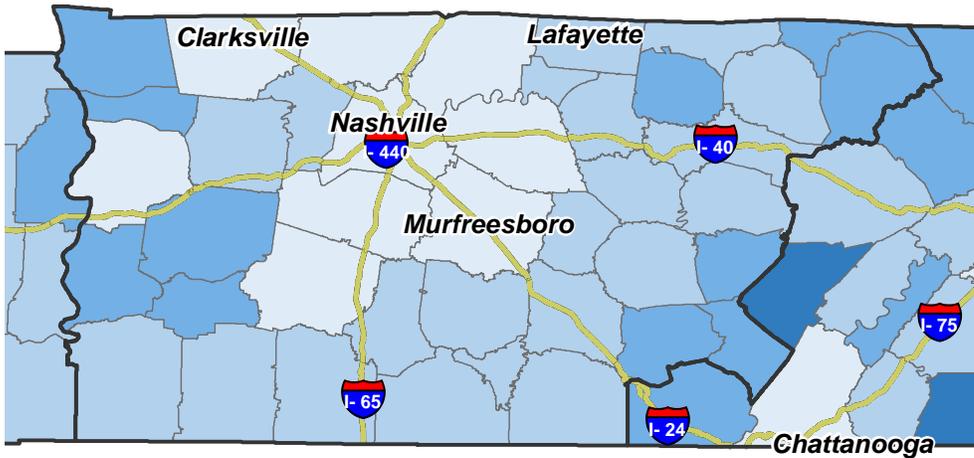
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% of Applicants Denied



Middle TN



East TN

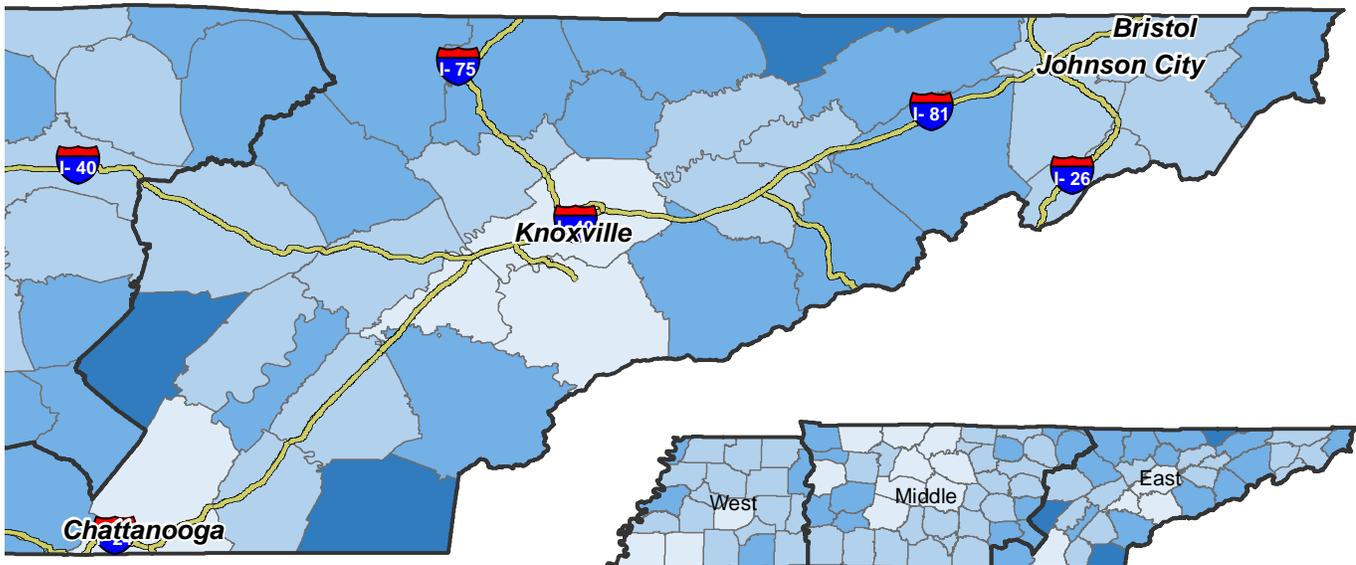


Table 4 shows denial rates by the gender of the applicant or applicants. Gender is missing a lot of data, but it does show that single-gender borrowers are denied at a slightly higher rate than all borrowers. This may be slightly misleading because male or female borrowers may include a single applicant or two applicants of the same gender while the “both” category includes co-borrowers of opposite gender. From this table, it is impossible to discern LGBT discrimination.

Table 4, Denial Rates by Gender of Applicant, 2007-2016

	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Male	18.7%	18.0%	14.4%	15.3%	15.7%	17.4%	16.1%	14.0%	11.9%	11.6%
Female	19.7%	18.4%	14.9%	14.7%	16.3%	17.5%	15.7%	13.0%	12.3%	11.3%
Both	11.2%	11.1%	11.0%	11.5%	11.8%	12.3%	11.8%	10.0%	8.5%	8.2%
Not Provided	23.5%	20.4%	17.4%	20.0%	21.8%	19.2%	21.1%	17.2%	17.4%	19.0%
Not Applicable	32.1%	45.7%	46.7%	33.3%	42.9%	29.4%	45.0%	11.1%	13.3%	28.6%
ALL	16.4%	15.5%	13.5%	14.0%	14.7%	15.6%	14.6%	12.4%	10.9%	10.5%

Source: HMDA

Note: “Male” may mean either two male co-borrowers or a single male borrower. “Female” may mean either two female co-borrowers or a single female borrower. “Both” means two co-borrowers of opposite genders.

Race and ethnicity disparities are more pronounced than gender. African Americans are denied at a much higher rate than any other race category over all the years presented. Hispanic applicants are also denied at a higher rate than non-Hispanic borrowers, though second to African American borrowers. Maps 3 and 4, following, show denial rates for Black applicants by census tract and county, respectively. Maps 5 and 6 show denial rates for Hispanic applicants by census tract and county, respectively. Of the data available, denial rates for these two categories of applicants are more concentrated though slightly fewer counties have rates over their respective disproportionate share threshold for Blacks and Hispanics.

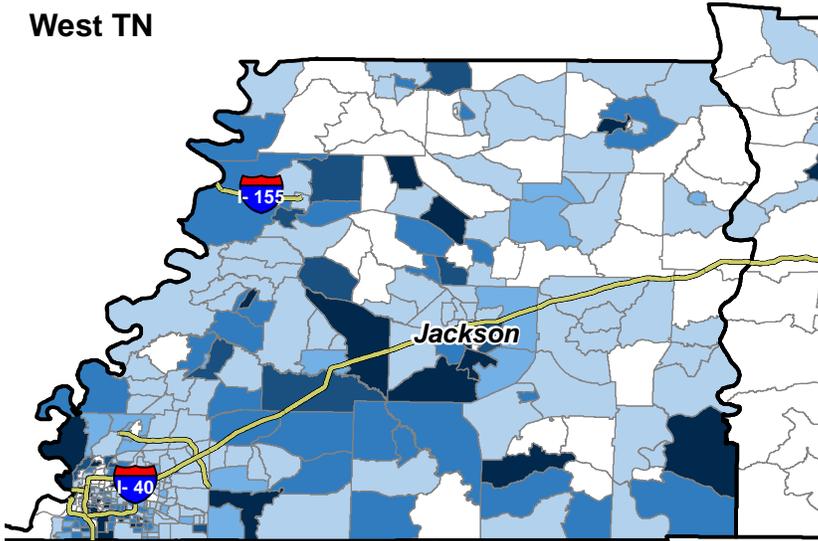
Table 5, Denial Rates by Race/Ethnicity of Applicant, 2007-2016

	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
All Applicants	16.4%	15.5%	13.5%	14.0%	14.7%	15.6%	14.6%	12.4%	10.9%	10.5%
Race										
Asian	12.5%	16.7%	13.4%	15.4%	16.8%	16.4%	16.3%	13.3%	12.1%	11.5%
African American	31.8%	30.2%	21.0%	21.2%	22.6%	24.7%	24.6%	20.6%	18.3%	17.3%
White	12.9%	13.1%	12.3%	12.7%	13.3%	14.4%	13.3%	11.2%	9.8%	9.4%
Other Minority	22.6%	23.7%	14.1%	16.0%	12.7%	17.6%	20.7%	14.0%	14.2%	14.4%
Multi-Racial	14.9%	17.2%	14.3%	16.0%	14.4%	17.0%	17.9%	12.1%	10.2%	11.7%
Missing	24.1%	20.1%	17.4%	19.6%	21.0%	20.0%	19.3%	19.1%	17.4%	15.9%
Ethnicity										
Hispanic	18.6%	19.5%	16.5%	17.0%	16.1%	19.0%	19.6%	17.1%	14.9%	12.6%
Not Hispanic	15.6%	14.9%	13.0%	13.5%	14.0%	15.1%	14.1%	11.8%	10.4%	10.0%

Source: 2016 HMDA Report, THDA

Note: These rates include conventional and non-conventional home purchase loans for owner-occupied properties.

West TN

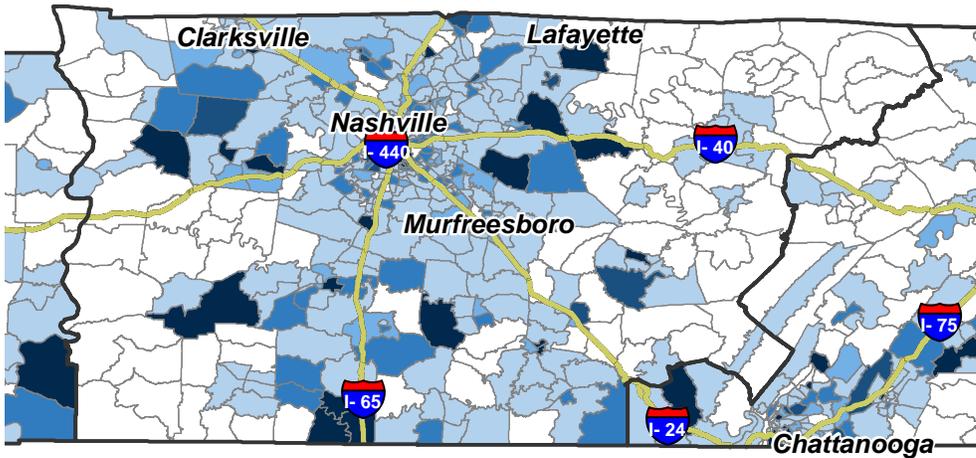


Map 3 2012-2016 Denial Rates for Black Applicants by Census Tract

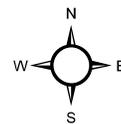
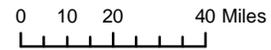
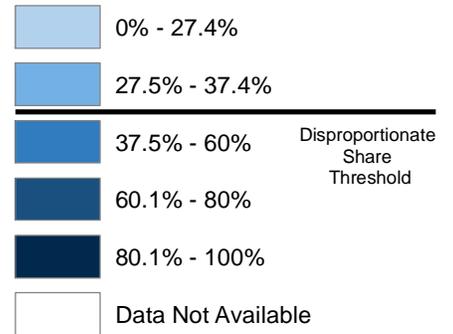
2012-2016 Average Denial Rate for Black Applicants in Tennessee = 27.4%

Disproportionate Share Threshold = 37.4%
(A disproportionate Share exists when the share of a population in a given area is at least 10 percentage points greater than the study area average.)

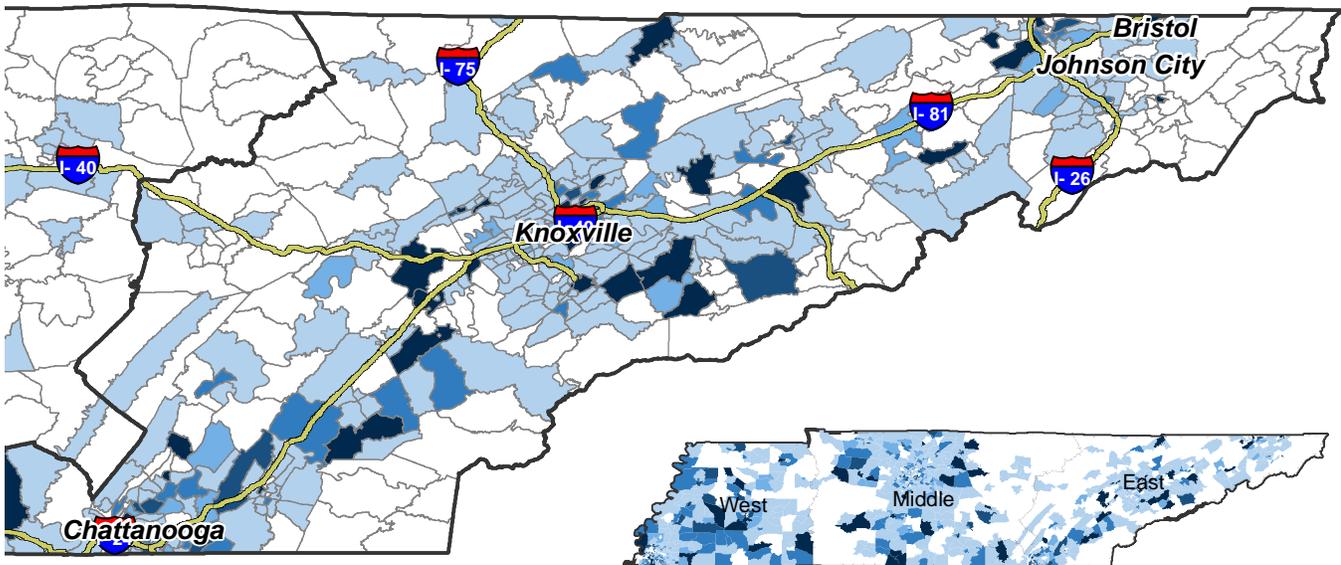
Middle TN



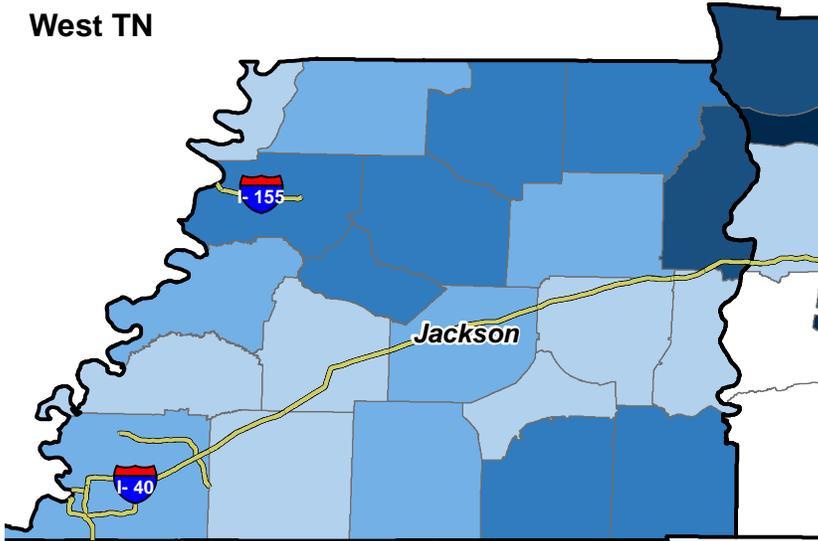
% of Applicants Denied



East TN



West TN

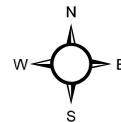
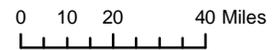
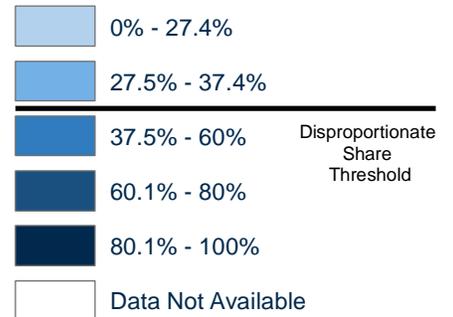


Map 4 2012-2016 Denial Rates for Black Applicants by County

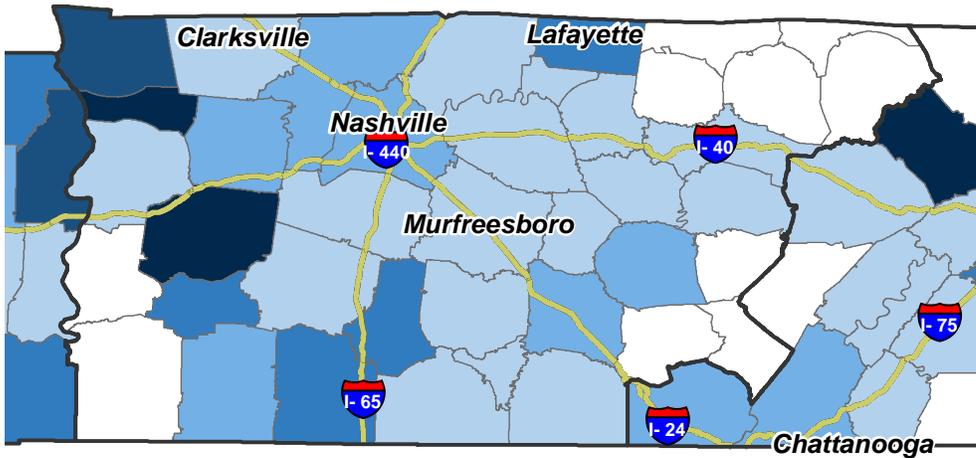
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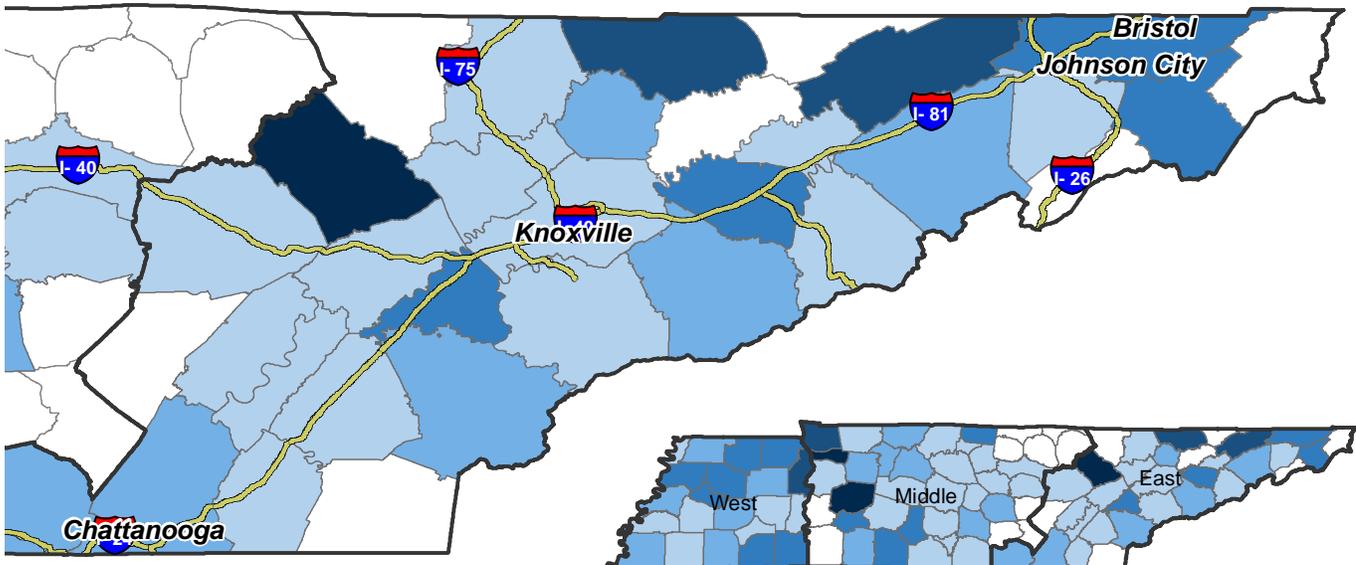
% of Applicants Denied



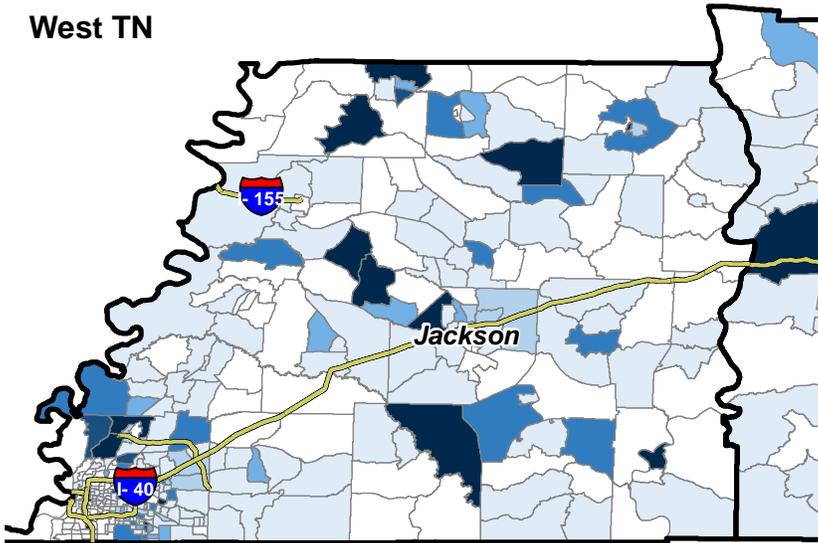
Middle TN



East TN



West TN

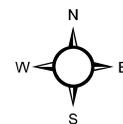
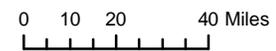
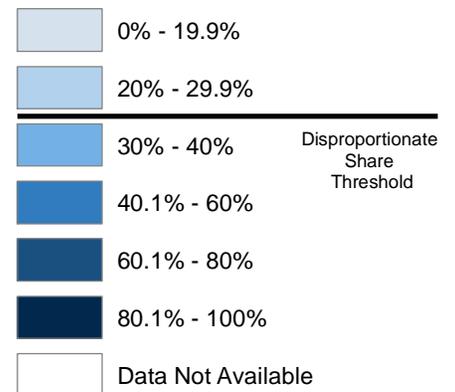


Map 5 2012-2016 Denial Rates for Hispanic Applicants by Census Tract

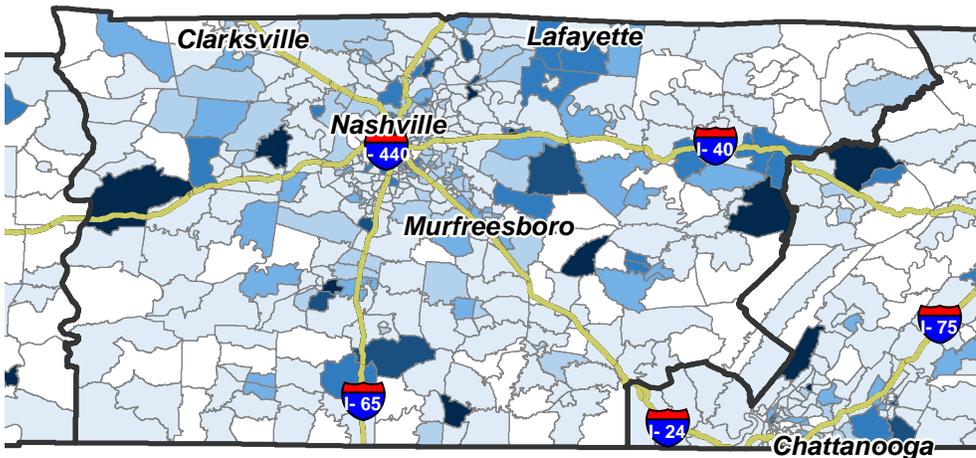
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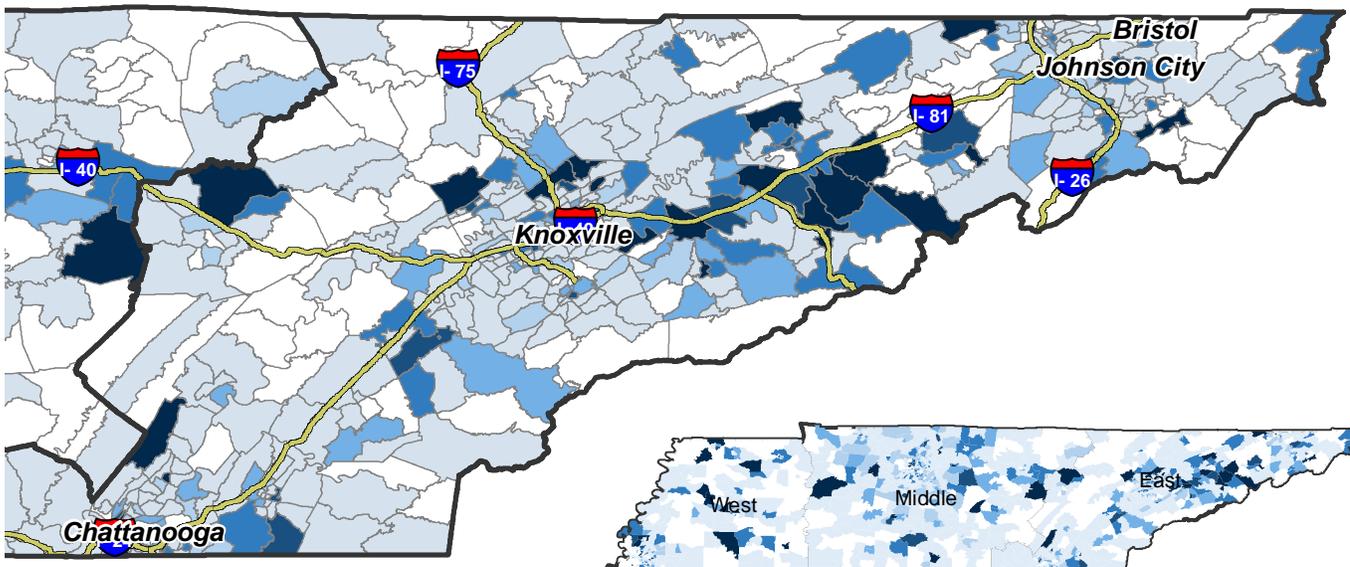
% of Applicants Denied



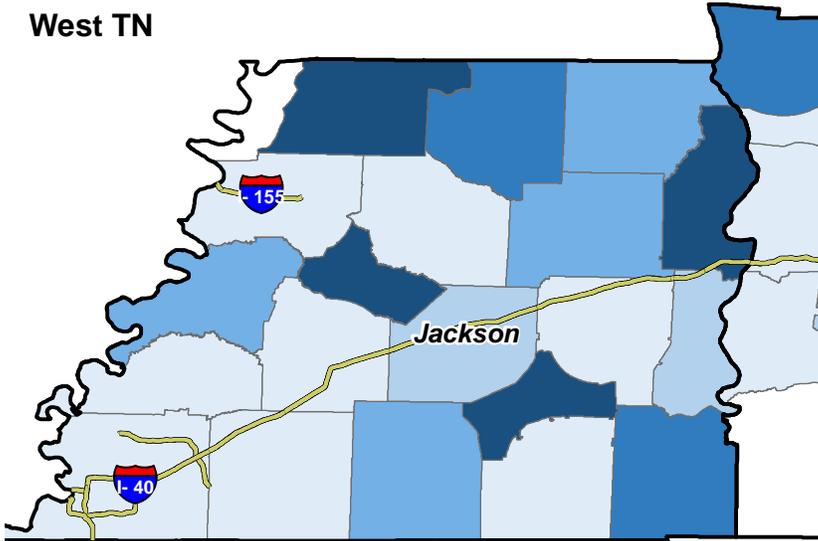
Middle TN



East TN



West TN

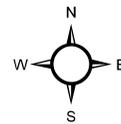
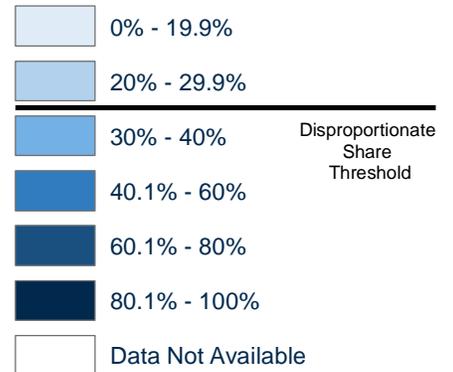


Map 6 2012-2016 Denial Rates for Hispanic Applicants by County

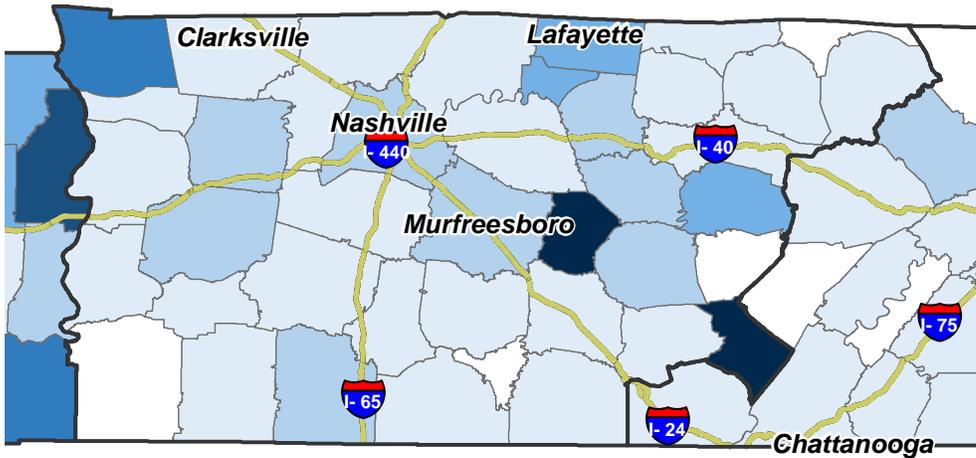
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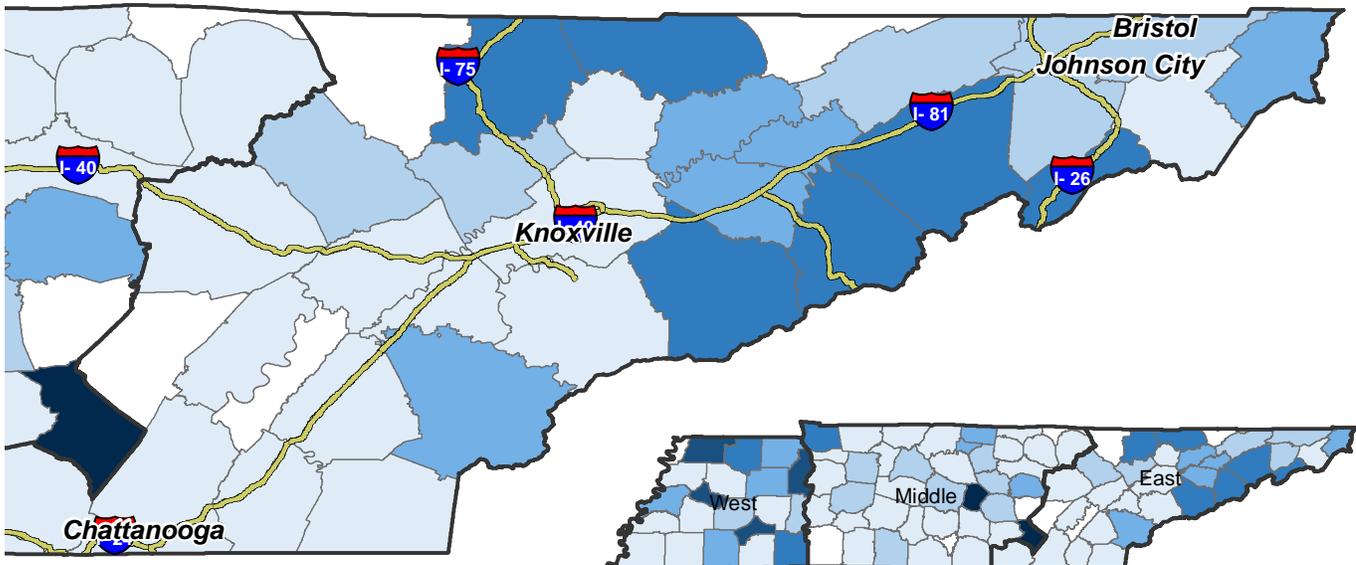
% of Applicants Denied



Middle TN



East TN



Though it is not uniformly required by financial institutions, Table 6 shows the reasons given for denied loan applicants. The two biggest reasons given for a denial are an applicant's debt-to-income ratio and their credit history.

Table 6, Loan Applications by Reason for Denial, 2007-2016

	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Debt-to-income ratio	2,206	1,655	1,526	1,349	1,358	1,629	1,697	1,588	1,592	1,675
Employment history	348	230	222	239	241	287	286	232	248	275
Credit history	3,456	2,152	1,929	1,736	1,904	2,443	2,299	1,618	1,631	1,429
Collateral	1,453	962	924	893	780	916	1,028	986	1,001	1,182
Insufficient cash (down payment, closing costs)	479	333	260	218	200	284	322	247	319	315
Unverifiable information	892	435	211	228	219	298	335	253	267	305
Credit application incomplete	1,523	899	372	322	265	481	578	457	500	562
Mortgage insurance denied	20	54	39	19	18	11	35	17	14	9
Other	1,508	665	555	518	416	705	705	543	571	620
No Reason Provided	5,644	3,692	2,434	2,310	2,413	2,715	3,256	3,203	3,058	3,417
Total	17,529	11,077	8,472	7,832	7,814	9,769	10,541	9,144	9,201	9,789

Source: HMDA, First-Lien, 1-4 Family Owner Occupied Home Purchase Loans

Table 7 and 8 show the denial rates by income for all borrowers and then by race and ethnicity. All borrowers with incomes of \$29,000 or less were denied at a rate above the five year disproportionate share threshold for all applicants. Blacks and Hispanics were denied at a higher rate than the average in each income category.

Table 7, Denial Rates by Income of Applicant, 2007-2016

	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Less than \$15K	51.3%	53.5%	56.7%	58.5%	63.1%	60.6%	60.8%	58.1%	60.8%	59.6%
\$15K to \$29K	27.4%	27.4%	22.9%	23.2%	24.3%	27.6%	27.1%	25.3%	23.1%	22.4%
\$30K to \$44K	18.7%	17.8%	13.8%	14.8%	16.0%	18.0%	17.3%	15.2%	13.5%	13.2%
\$45K to \$59K	12.5%	12.0%	10.1%	10.5%	11.1%	11.8%	11.1%	9.5%	8.3%	8.2%
Above \$75K	17.3%	12.2%	13.8%	5.8%	14.4%	9.6%	12.2%	9.2%	7.5%	10.5%
Missing	40.3%	36.5%	42.4%	74.3%	60.8%	59.7%	49.8%	35.2%	29.5%	25.0%
Total	16.4%	15.5%	13.5%	14.0%	14.7%	15.6%	14.6%	12.4%	10.9%	10.5%

Source: HMDA, First-Lien, 1-4 Family Owner Occupied Home Purchase Loans

Table 8, Denial Rates of Loans by Race/Ethnicity¹ and Income of Applicant, 2007-2016

	Less than \$15K	\$15K to \$29K	\$30K to \$44K	\$45K to \$59K	Above \$75K	Missing	Average
Asian	48.6%	22.4%	13.9%	9.4%	14.8%	23.4%	12.0%
Black	56.7%	30.3%	22.3%	17.3%	18.8%	34.6%	21.3%
White	47.1%	20.2%	12.4%	8.2%	8.3%	19.9%	10.8%
Other	53.8%	31.4%	20.6%	9.8%	8.6%	31.0%	15.0%
Multi Race	62.5%	29.3%	18.7%	10.1%	7.7%	21.1%	12.4%
Race Missing	54.5%	30.1%	19.9%	12.2%	11.6%	33.0%	16.3%
Average	49.0%	22.2%	14.2%	9.2%	9.4%	23.3%	12.1%
Hispanic	50.5%	23.9%	16.0%	11.1%	10.3%	26.1%	14.9%
Non-Hispanic	48.2%	21.5%	13.6%	8.8%	9.2%	20.6%	11.7%

Source: HMDA

High Annual Percentage Rate Loans (HALs)

High Annual Percentage Rate Loans, or HALs, are defined as more than three percentage points higher than comparable treasury rates for home purchase loans. HALs are often used in discussions about predatory lending practices as borrowers who qualify for these higher rates tend to be disproportionately minority, with the highest rates noted for African Americans.

Table 9 shows that HALs made up 6.7 percent of the 80,282 total originated loans in 2016. Figure 2 further displays that HALs were most prevalent before the 2008 recession, with upticks starting after 2010 as the economy improved. HAL rates have leveled in the last couple years of data available.

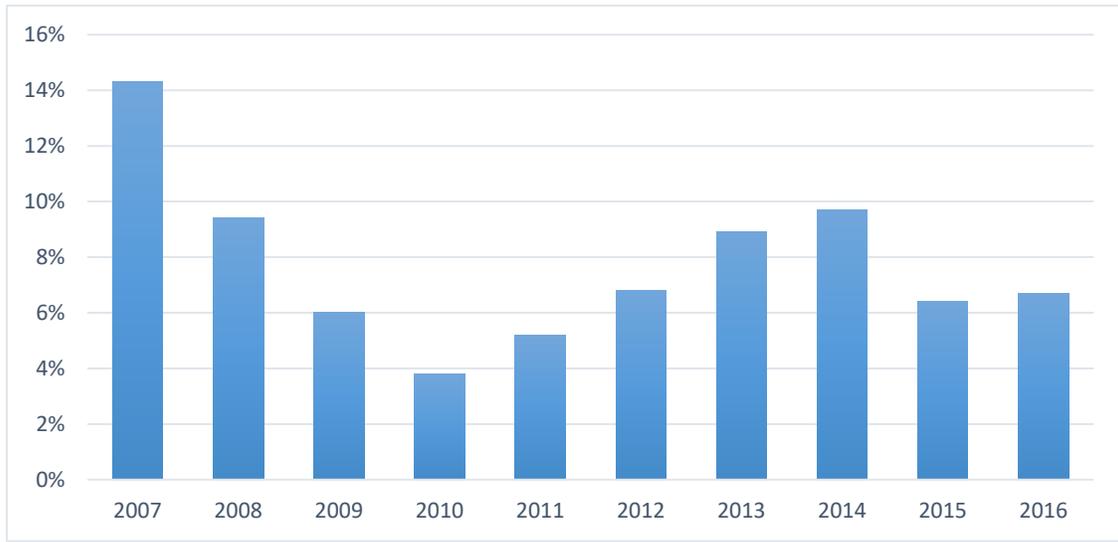
Table 9, Originated Owner-Occupied Loans by HAL Status, 2007-2016

	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Other	70,001	50,845	48,293	43,713	40,503	46,841	53,393	55,995	67,545	74,886
HALs	11,646	5,277	3,084	1,720	2,213	3,438	5,220	6,003	4,627	5,396
Total Loans Originated	81,647	56,122	51,377	45,433	42,716	50,279	58,613	61,998	72,172	80,282
Percent of HALs	14.3%	9.4%	6.0%	3.8%	5.2%	6.8%	8.9%	9.7%	6.4%	6.7%

Source: HMDA

¹ For more information about how race and ethnicity are defined, see the [2016 HMDA report, Appendix C](#)

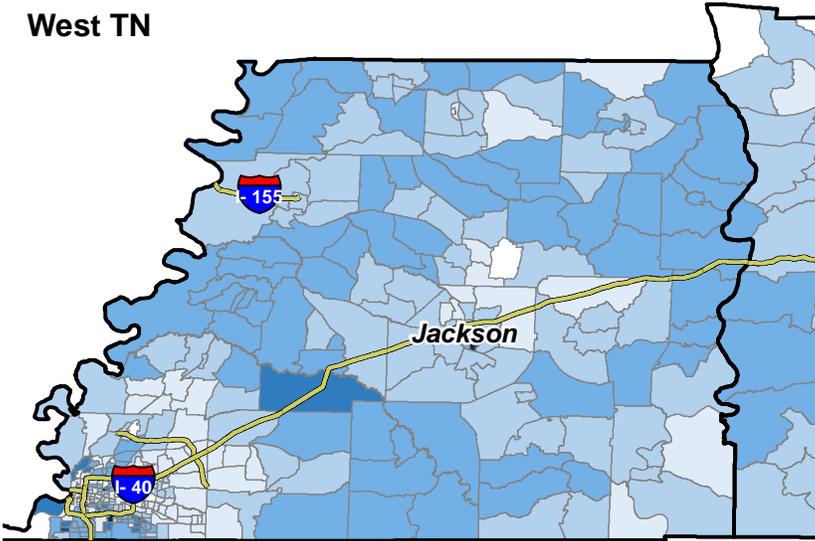
Figure 2, HAL Rates by Year, 2007-2016



Source: HMDA

Maps 7 and 8 present the rate of HALs by census tract and county throughout Tennessee. Just like denial rates, HALs are most prevalent in rural areas of the state, with 25 counties (26 percent) experiencing rates over the disproportionate share threshold for all applicants. Grundy County had the highest rate of HALs with almost 40 percent.

West TN

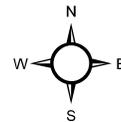
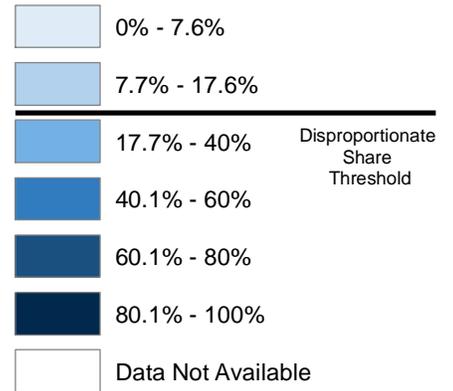


Map 7 2012-2016 HALs by Census Tract

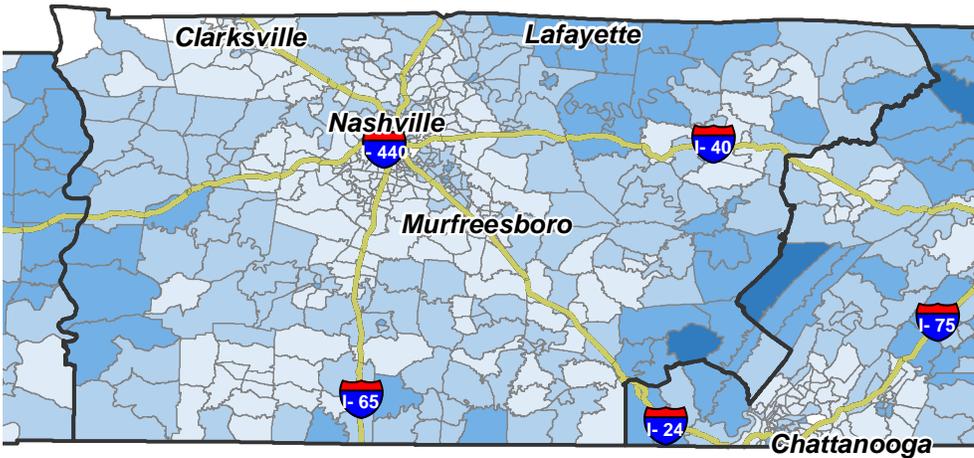
2012-2016 Average HAL Rate for All Applicants in Tennessee = 7.6%

Disproportionate Share Threshold = 17.6%
(A disproportionate Share exists when the share of a population in a given area is at least 10 percentage points greater than the study area average.)

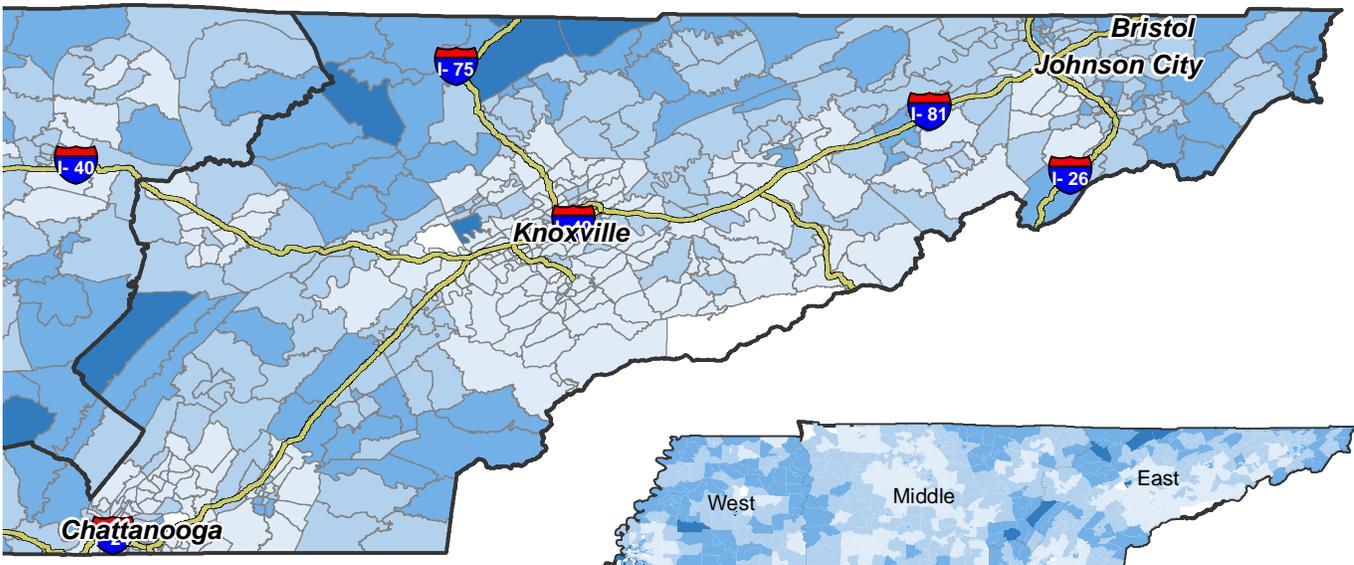
% HALs



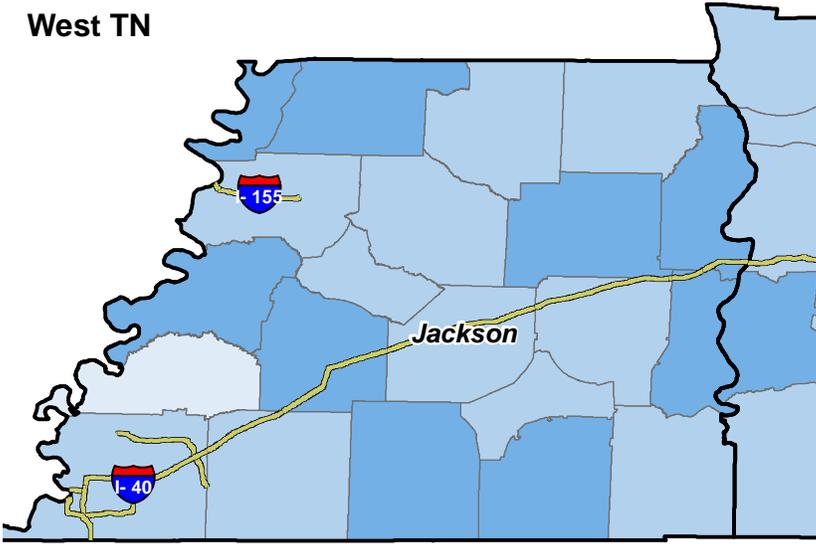
Middle TN



East TN



West TN

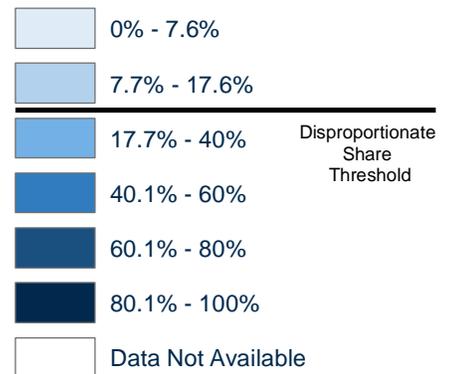


Map 8 2012-2016 HAL Rates by County

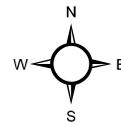
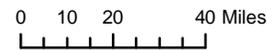
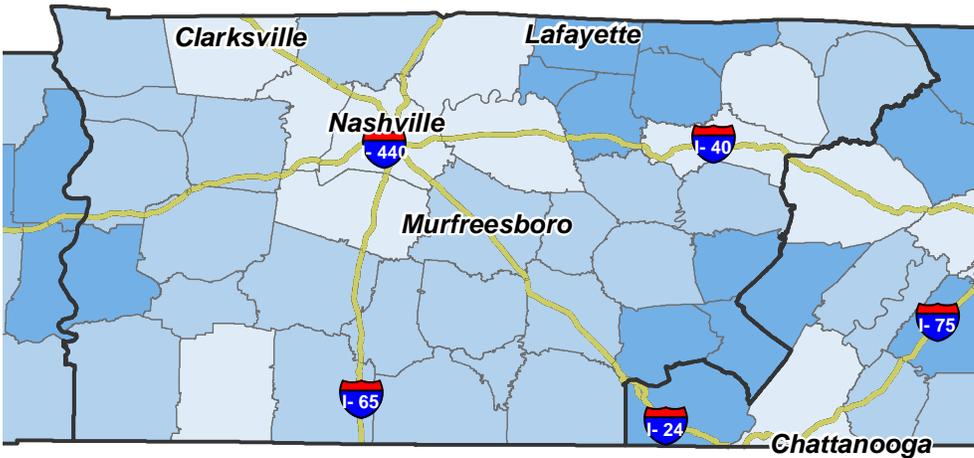
2012-2016 Average HAL Rate for All Applicants in Tennessee = 7.6%

Disproportionate Share Threshold = 17.6%
(A disproportionate Share exists when the share of a population in a given area is at least 10 percentage points greater than the study area average.)

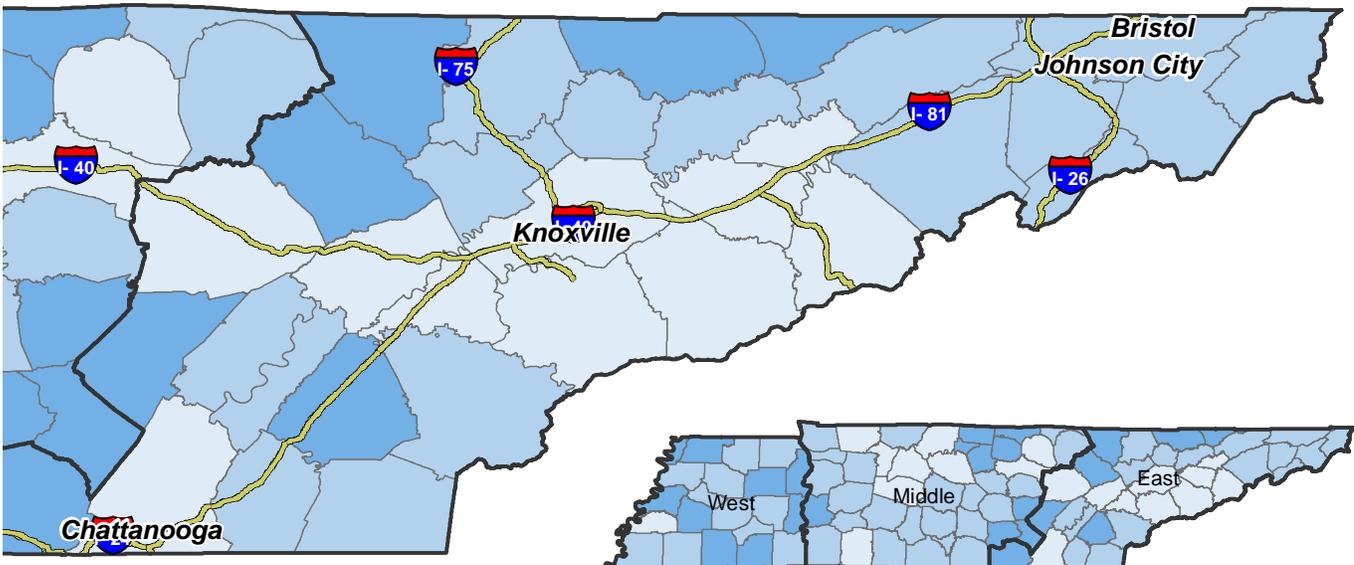
% of HALs



Middle TN



East TN



HALs originated by borrower’s race and ethnicity are presented in tables 10 and 11. The tables show that African Americans originate HALs at a significantly higher rate than any other race. Hispanics follow with the second highest rate of HAL originations.

Table 10, HALs Originated by Race/Ethnicity of Borrower, 2007-2016

	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	Total
Asian	93	37	30	15	23	34	59	77	41	47	456
Black or African American	2,752	767	239	140	283	411	635	888	507	683	7,305
White	7,640	4,119	2,677	1,507	1,792	2,797	4,221	4,704	3,857	4,384	37,698
Other Minority**	72	21	12	8	14	10	27	45	20	19	248
Multi-Racial	72	38	21	12	20	33	62	82	71	74	485
Missing	1,017	295	105	38	81	153	216	207	131	189	2,432
Total	11,646	5,277	3,084	1,720	2,213	3,438	5,220	6,003	4,627	5,396	48,624
Hispanic or Latino	537	187	76	39	73	107	197	249	204	265	1,934
Not Hispanic or Latino	10,177	4,806	2,897	1,632	2,062	3,166	4,775	5,537	4,254	4,933	44,239

Source: HMDA, First-Lien, 1-4 Family Owner Occupied Home Purchase Loans

**American Indians or Alaska Natives, Native Hawaiians or other Pacific Islanders

Table 11, Rate of HALs Originated by Race/Ethnicity of Borrower, 2007-2016

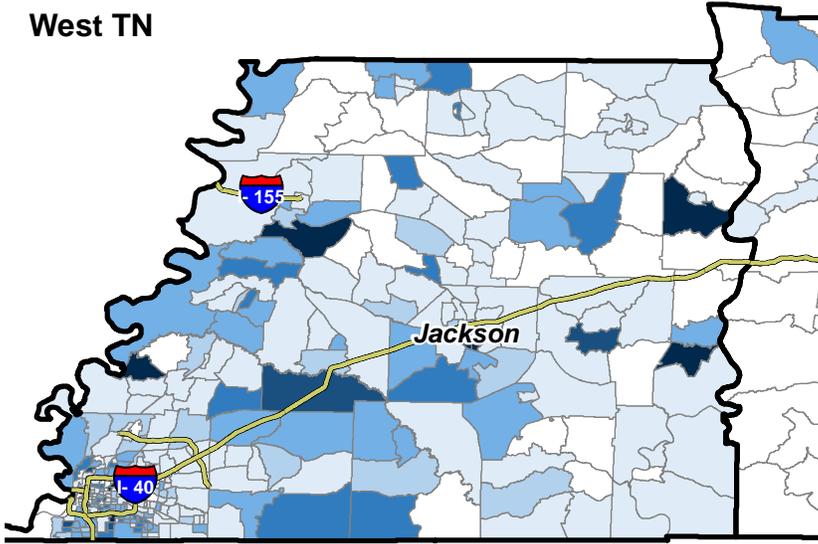
	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	Total
Asian	7.3%	5.0%	3.6%	2.3%	3.7%	4.2%	5.8%	7.4%	3.2%	3.0%	4.6%
Black or African American	33.5%	17.1%	5.9%	3.6%	9.1%	11.5%	17.7%	22.4%	10.9%	12.6%	16.2%
White	11.8%	9.0%	6.3%	4.0%	5.0%	6.6%	8.5%	9.0%	6.3%	6.5%	7.6%
Other Minority**	24.7%	12.2%	4.5%	3.2%	5.1%	4.5%	10.7%	15.1%	6.7%	5.6%	9.3%
Multi-Racial	8.8%	6.9%	4.0%	3.0%	4.3%	6.1%	8.9%	9.9%	7.0%	6.1%	6.9%
Missing	15.6%	7.0%	3.1%	1.5%	3.3%	5.3%	6.4%	6.0%	3.6%	4.1%	6.6%
Total	14.3%	9.4%	6.0%	3.8%	5.2%	6.8%	8.9%	9.7%	6.4%	6.7%	8.1%
Hispanic or Latino	20.2%	12.1%	6.1%	3.4%	6.3%	7.8%	11.4%	12.6%	8.3%	8.6%	10.5%
Not Hispanic or Latino	14.0%	9.5%	6.2%	3.9%	5.3%	6.9%	8.9%	9.8%	6.4%	6.8%	8.1%

Source: HMDA: First-Lien, 1-4 Family Owner Occupied Home Purchase Loans

**American Indians or Alaska Natives, Native Hawaiians or other Pacific Islanders

Maps 9 and 10 detail HALs originated by Black applicants by census tract and county, and Maps 11 and 12 detail the same by Hispanic applicants. Though some data is missing, it is notable that Hispanic HAL originations have rates above the disproportionate share threshold in over 30 percent of all Tennessee counties, mostly more rural counties.

West TN

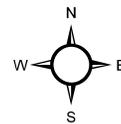
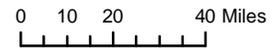
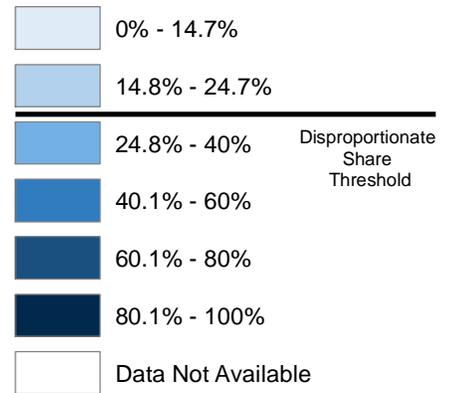


Map 9 2012-2016 HALs for Black Applicants by Census Tract

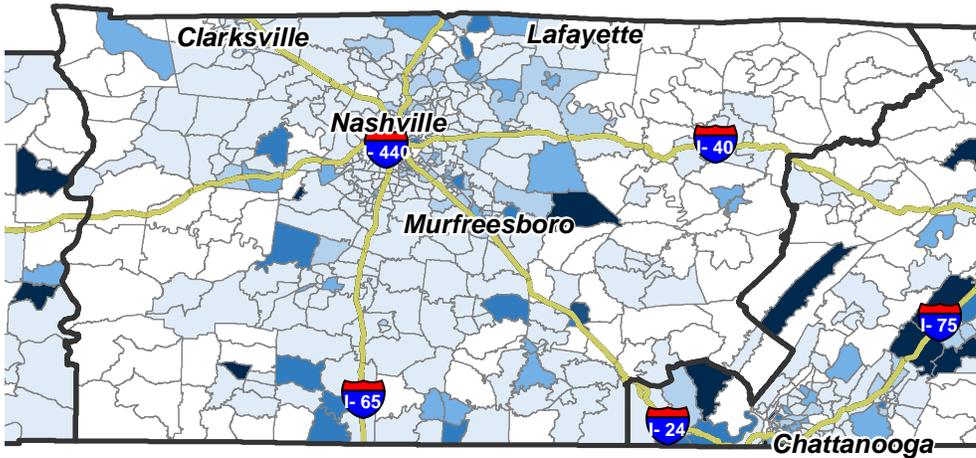
2012-2016 Average HAL Rate for Black Applicants in Tennessee = 14.7%

Disproportionate Share Threshold = 24.7%
(A disproportionate Share exists when the share of a population in a given area is at least 10 percentage points greater than the study area average.)

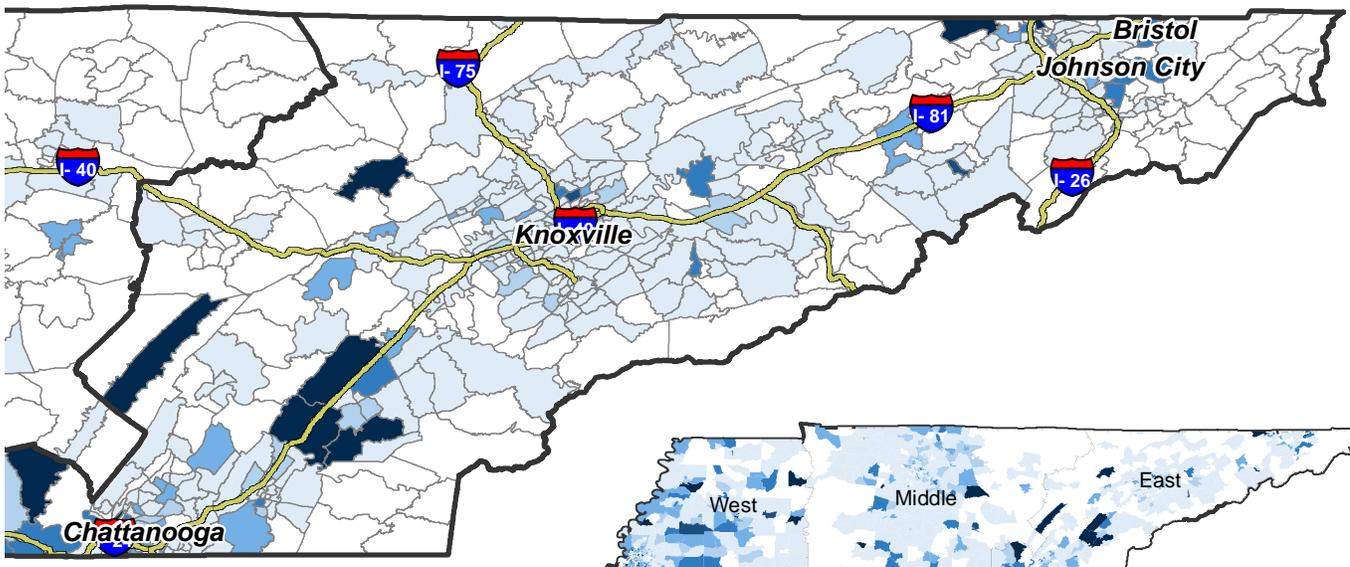
% HALs



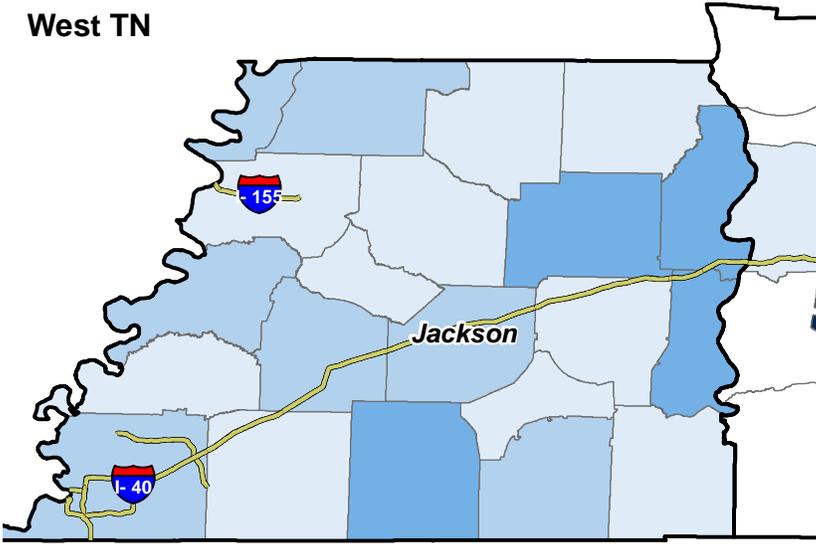
Middle TN



East TN



West TN

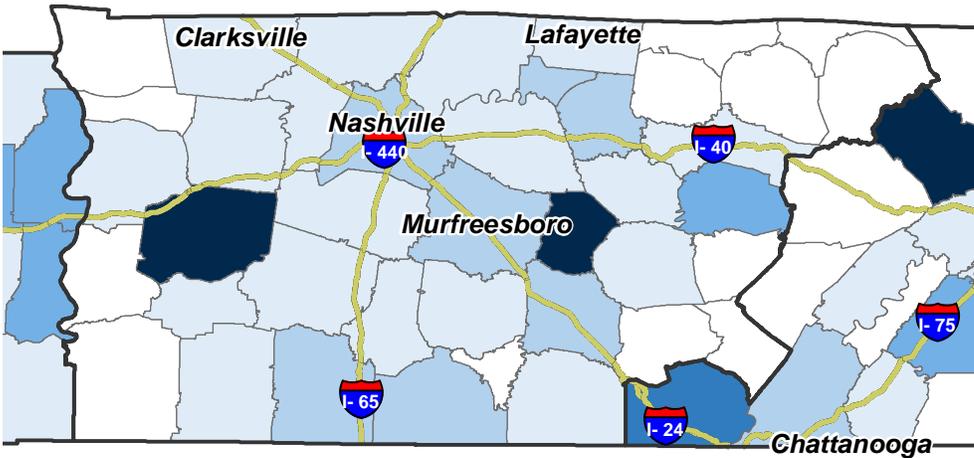


Map 10 2012-2016 HAL Rates for Black Applicants by County

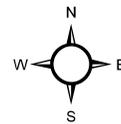
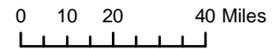
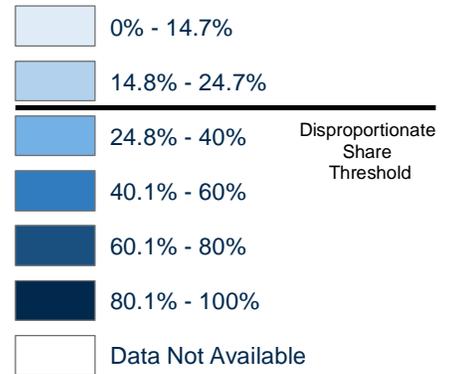
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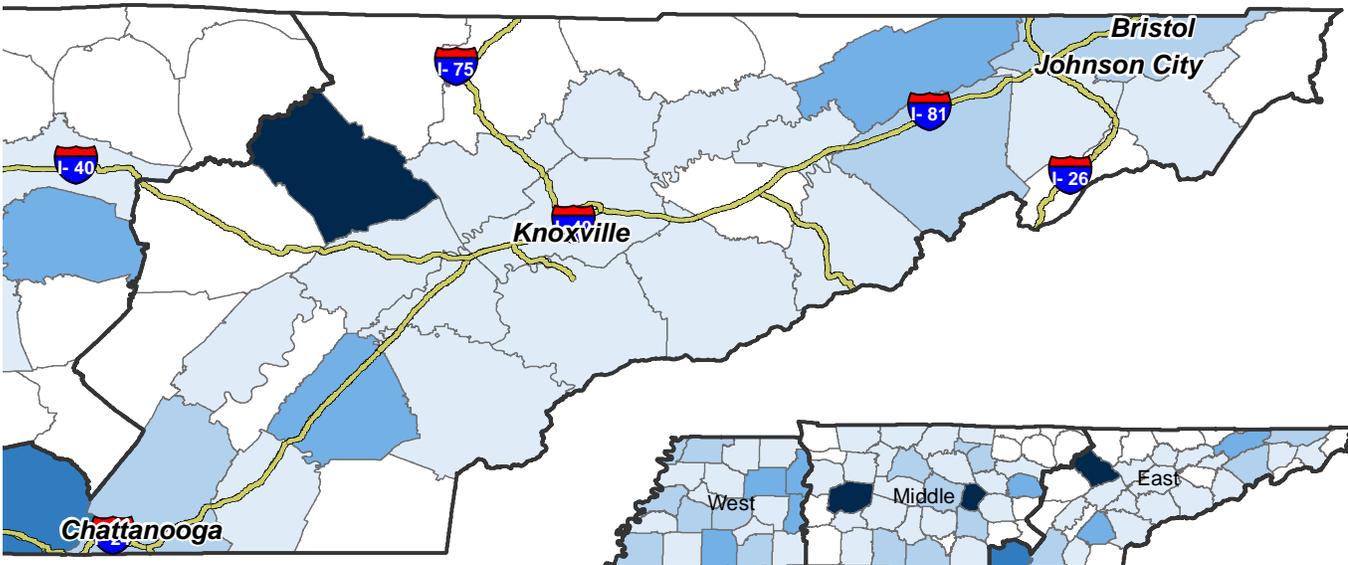
Middle TN



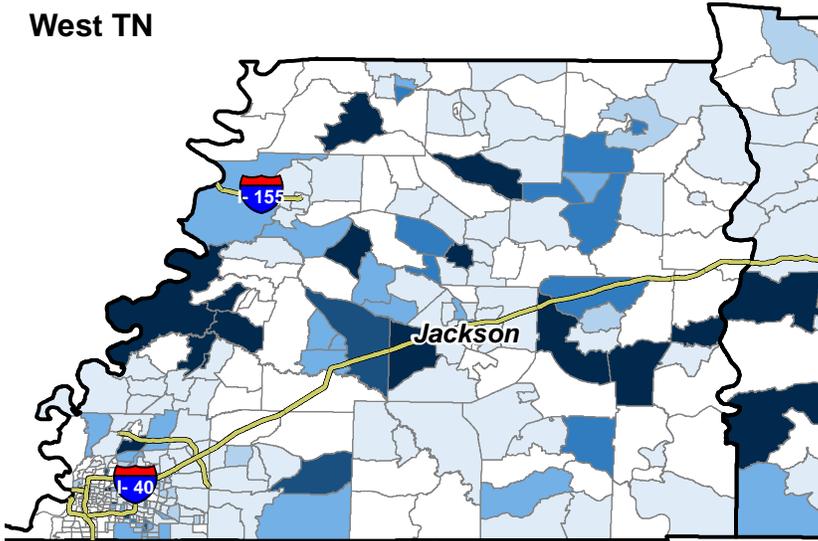
% of HALs



East TN



West TN

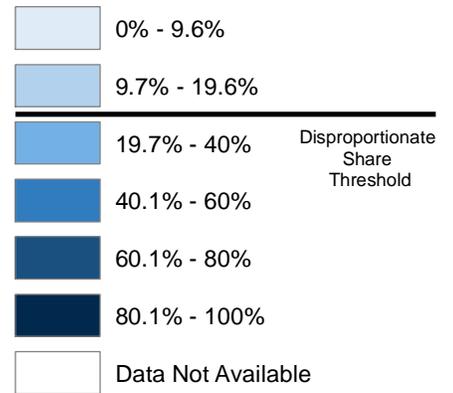


Map 11 2012-2016 HALs for Hispanic Applicants by Census Tract

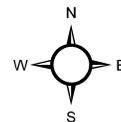
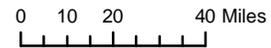
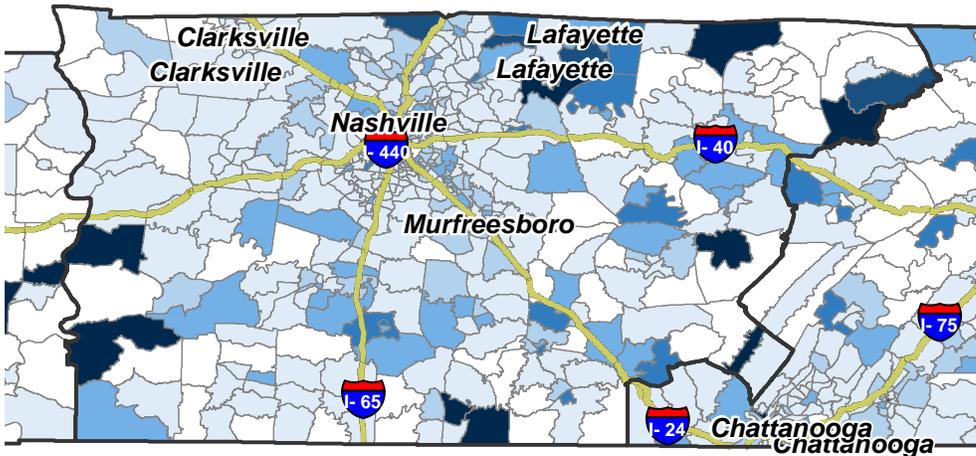
2012-2016 Average HAL Rate for Hispanic Applicants in Tennessee = 9.6%

Disproportionate Share Threshold = 19.6%
(A disproportionate Share exists when the share of a population in a given area is at least 10 percentage points greater than the study area average.)

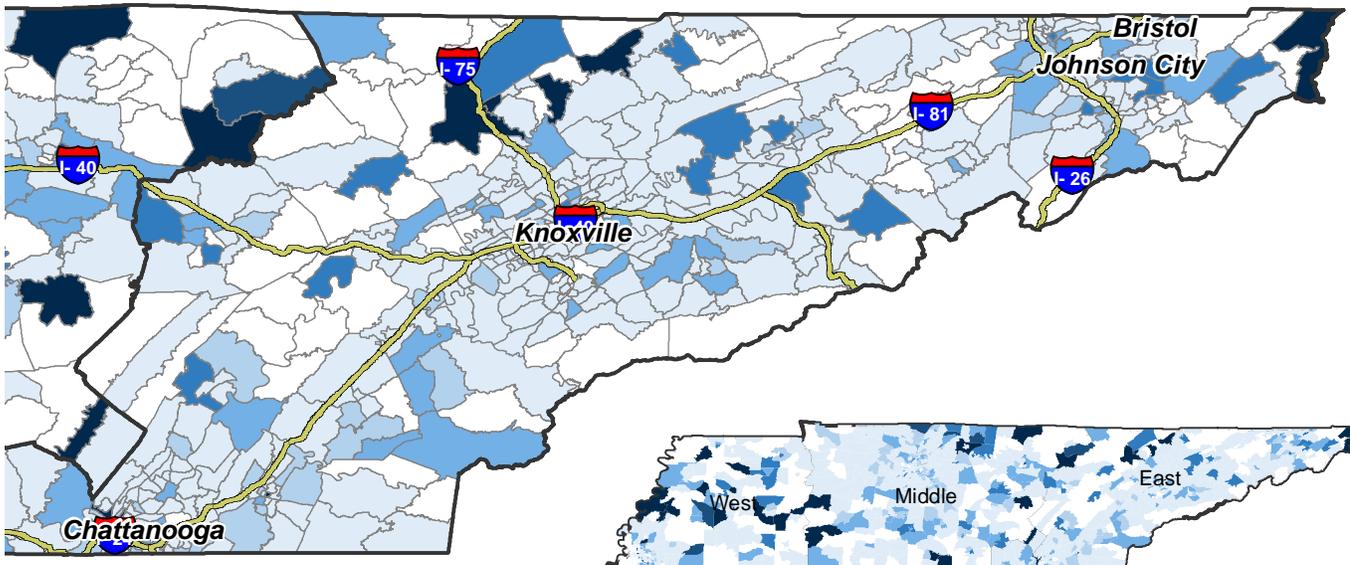
% HALs



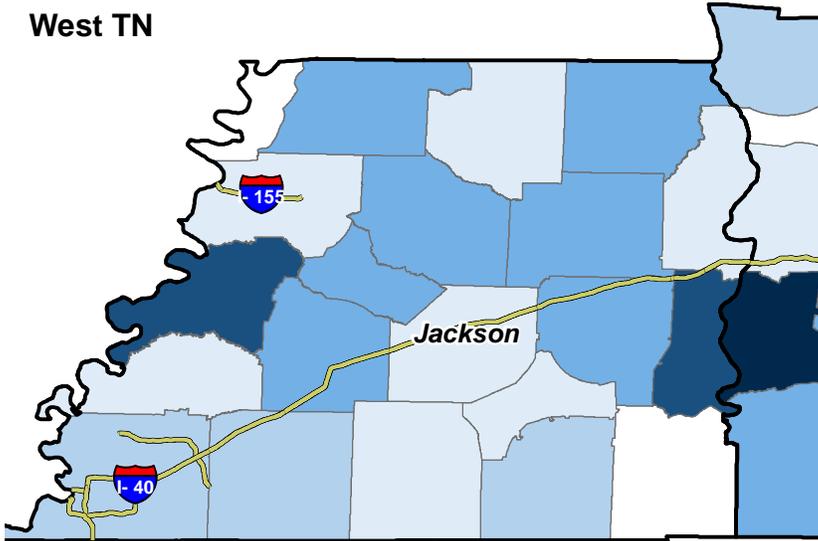
Middle TN



East TN



West TN



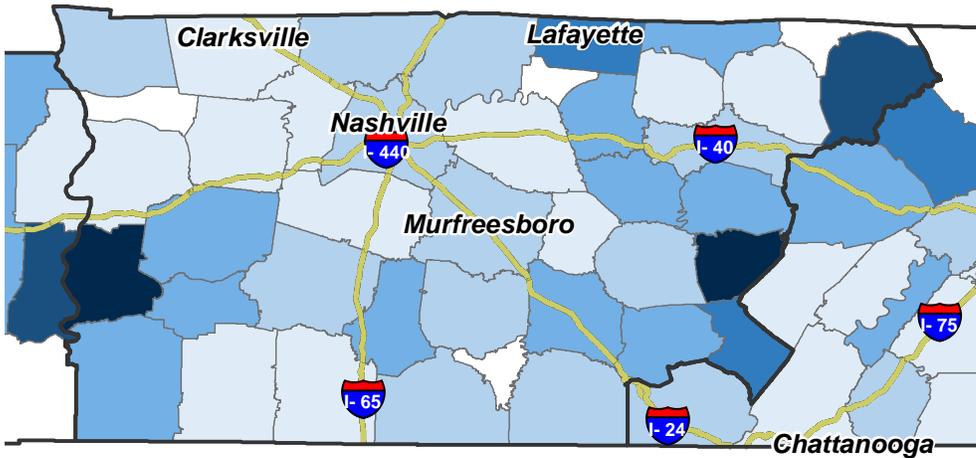
Map 12

2012-2016 HAL Rates for Hispanic Applicants by County

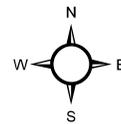
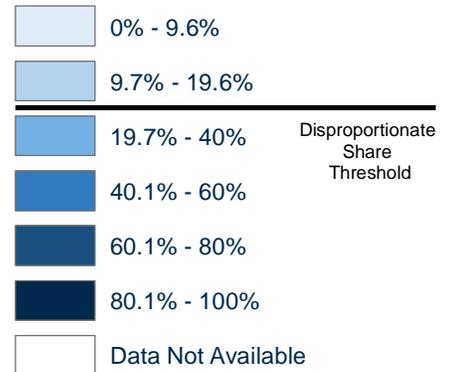
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 (A disproportionate Share exists when the share of a population in a given area is at least 10 percentage points greater than the study area average.)

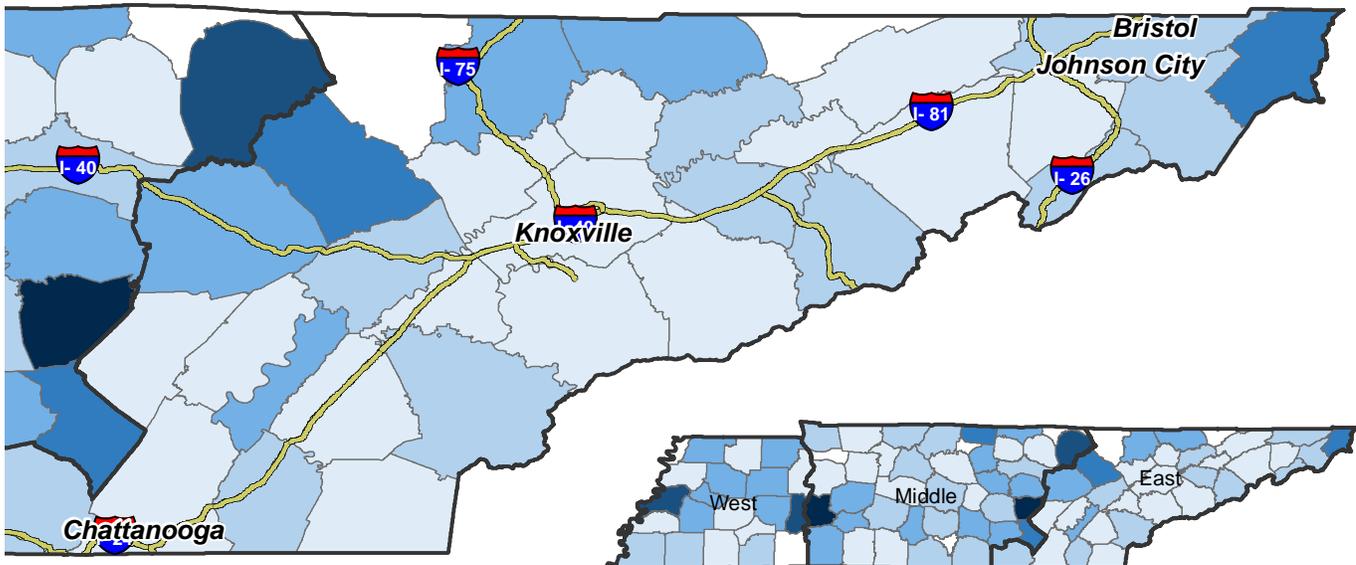
Middle TN



% of HALs



East TN



Tennessee Human Rights Commission

The Tennessee Human Rights Commission (THRC) process housing discrimination complaints. The following tables update the available data on fair housing complaints and the associated outcomes from February 2013 – February 2018. With the addition of five years of data to the existing analysis found in the 2013 Analysis of Impediments, one can view the types of complaints found in Tennessee, the protected classes filing the complaints, and the complaints conciliated or settled during the five-year data period. Additionally, because this Analysis of Impediments is for the entire state, instead of just the non-entitlement jurisdictions as the 2013 analysis was, the complaints by county are provided to see the geographic distribution of complaints.

During the 60-month period covered by the data, there were 1,508 fair housing complaints. The most frequently cited basis for the complaint was disability, with 1,235 bases based on disability status. Note, because one complaint can include multiple bases, there is duplication in this number.

Table 12, Fair Housing Complaints by Basis, 2013 – 2018

Basis	2013	2014	2015	2016	2017	2018²	Total
Race	73	168	213	179	171	5	809
National Origin	14	33	35	25	37	8	152
Color	7	0	3	15	19	229	273
Religion	3	16	5	21	10	34	89
Disability	89	211	332	311	272	20	1235
Familial Status	17	30	41	72	62	0	222
Sex	17	87	81	81	63	0	329
Retaliation	52	72	103	56	41	0	324
Total Bases	272	617	813	760	675	296	3433
Total Complaints	133	303	353	339	287	93	1508

Source: Tennessee Human Rights Commission

Table 13, Fair Housing Complaints in Tennessee, by Complaint Type, February 2013 – February 2018

Complaint Type	Total Complaints Filed under this reason	Percent of Total Complaints Filed
Discriminatory refusal to sell	14	0.9%
Discriminatory refusal to rent	636	42.2%
Discriminatory advertising, statements and notices	178	11.8%
False denial or representation of availability	24	1.6%
Discriminatory financing (includes real estate transactions)	48	3.2%
Discriminatory terms, conditions, privileges, or services and facilities	1369	90.8%

² Basis reporting categories were changed in 2018

Steering	9	0.6%
Otherwise deny or make housing unavailable	759	50.3%
Other discriminatory acts	17	1.1%
Discriminatory acts under Section 818 (coercion, Etc.)	495	32.8%
Using ordinances to discriminate in zoning and land use	2	0.1%
Non-compliance with design and construction requirements (handicap)	4	0.3%
Failure to permit reasonable modification	52	3.4%
Failure to make reasonable accommodation	492	32.6%
Total Complaints (unduplicated)	1508	

Note: Complaints can be listed under more than one reason.

Source: Tennessee Human Rights Commission

Additional focus on the protected classes of disability and race is important to gaining a greater sense of the fair housing landscape in the state. These two classes are the most frequent to both file complaints and to have a finding of settlement or conciliation. The table below shows a few trends across these two most common bases for fair housing complaints. The most frequent three issues are “Discriminatory terms, conditions, privileges or services and facilities”, “Discriminatory Refusal to Rent” and “Otherwise deny or make housing unavailable”. The disparity between rent-based versus sale-based complaints is interesting to note and may provide window into areas to strategically target efforts to affirmative further fair housing.

In the following table, one can see that those with discrimination complaints based on race or disability share in their volume of these issues.

Table 14, Complaints by Race and Disability

Reason	Race	% of the Reason Total	Disability	% of the Reason Total	Total
Discriminatory Refusal to Sell	4	67%	0	0%	6
Discriminatory Refusal to Rent	124	45%	145	53%	275
Discriminatory Advertising, Statements and Notices	26	34%	36	47%	76
False Denial or Representation of Availability	7	78%	1	11%	9
Discriminatory financing (includes real estate transactions)	8	42%	11	58%	19
Discriminatory terms, conditions, privileges, or services and facilities	227	39%	345	59%	586
Steering	3	75%	0	0%	4
Otherwise deny or make housing unavailable	131	40%	183	56%	327
Other discriminatory acts	3	50%	2	33%	6
Discriminatory acts under Section 818 (coercion, Etc.)	76	42%	97	54%	181

Using ordinances to discriminate in zoning and land use	0	0%	1	100%	1
Non-compliance with design and construction requirements (handicap)	0	0%	2	100%	2
Failure to permit reasonable modification	3	13%	23	100%	23
Failure to make reasonable accommodation	26	12%	220	100%	221
Filed Cases	249		378		916

Source: Tennessee Human Rights Commission

After Race and Disability, the most frequent protected class represented in complaints filed include Sex and Retaliation.

Table 15, Basis of Fair Housing Complaint by Protected Class of Complainant, Tennessee 2013 - 2018

Reason	Race	Disability	National Origin	Color	Religion	Familial Status	Sex	Retaliation	Total
Discriminatory Refusal to Sell	4	0	2	0	1	0	1	0	8
Discriminatory Refusal to Rent	111	114	17	40	11	34	40	24	391
Discriminatory Advertising, Statements and Notices	23	27	5	12	5	18	15	7	112
False Denial or Representation of Availability	6	1	2	1	0	2	3	0	15
Discriminatory financing (includes real estate transactions)	8	10	4	1	2	1	4	0	30
Discriminatory terms, conditions, privileges, or services and facilities	209	295	40	65	22	54	81	67	833
Steering	3	0	0	0	0	1	0	1	5
Otherwise deny or make housing unavailable	116	154	24	38	13	36	42	36	459
Other discriminatory acts	3	2	1	0	0	1	2	2	11
Discriminatory acts under Section 818 (coercion, Etc.)	70	95	10	10	6	15	35	76	317
Using ordinances to discriminate in zoning and land use	0	1	0	0	0	0	0	0	1
Non-compliance with design and construction requirements (handicap)	0	1	0	1	0	0	0	1	3
Failure to permit reasonable modification	3	21	1	3	0	0	0	3	31

Failure to make reasonable accommodation	22	188	1	35	5	2	18	30	301
Filed Cases (Unduplicated)	231	326	45	67	24	58	88	77	916

Source: Tennessee Human Rights Commission

Across the 60-month study period, there were 59 counties who had at least one discrimination filing. Total filed cases across the counties with a disposition code (meaning that there was a closure reason) was 632. The difference between these totals and the totals in the above table may be due to timing of a filed case versus a closure status or could be due to geographic information being unknown in the above data.

Table 16, Total Fair Housing Complaints with a Completion Status, by County, Tennessee, Feb 2013 – Feb 2018

County	2013	2014	2015	2016	2017	2018	Total
Anderson	0	1	2	2	0	2	7
Bedford	0	0	1	1	0	0	2
Benton	0	0	0	0	0	0	0
Bledsoe	0	0	0	0	0	0	0
Blount	0	2	4	4	3	1	14
Bradley	1	3	1	1	4	0	10
Campbell	0	0	0	0	1	0	1
Cannon	0	0	0	0	0	0	0
Carroll	0	0	0	0	0	2	2
Carter	0	3	0	0	1	1	5
Cheatham	0	1	2	2	0	0	5
Chester	0	1	0	0	0	0	1
Claiborne	0	0	0	0	0	0	0
Clay	0	0	0	0	0	0	0
Cocke	0	0	0	0	0	0	0
Coffee	0	0	2	2	2	0	6
Crockett	1	0	0	0	0	0	1
Cumberland	0	0	1	1	0	0	2
Davidson	17	20	22	22	23	13	117
Decatur	0	0	1	1	0	0	2
DeKalb	0	0	1	1	0	1	3
Dickson	0	1	3	3	2	0	9
Dyer	1	1	2	2	6	0	12
Fayette	0	0	0	0	0	0	0
Fentress	0	0	0	0	0	0	0
Franklin	0	0	0	0	0	0	0
Gibson	0	3	0	0	4	1	8
Giles	0	0	0	0	0	0	0
Grainger	0	0	1	1	0	1	3

Greene	0	0	0	0	0	0	0
Grundy	0	0	0	0	0	0	0
Hamblen	0	0	4	4	0	0	8
Hamilton	3	4	11	11	8	7	44
Hancock	0	0	0	0	0	0	0
Hardeman	0	0	0	0	0	1	1
Hardin	1	0	0	0	0	0	1
Hawkins	0	1	0	0	0	1	2
Haywood	1	0	0	0	0	0	1
Henderson	0	0	0	0	1	2	3
Henry	0	1	1	1	2	0	5
Hickman	0	1	0	0	0	1	2
Houston	0	0	0	0	0	0	0
Humphreys	0	1	0	0	0	0	1
Jackson	0	0	0	0	0	0	0
Jefferson	0	1	0	0	0	0	1
Johnson	0	0	0	0	0	0	0
Knox	1	17	20	20	12	8	78
Lake	0	1	0	0	0	0	1
Lauderdale	0	2	0	0	0	0	2
Lawrence	0	3	0	0	0	0	3
Lewis	0	0	0	0	1	0	1
Lincoln	1	0	0	0	0	0	1
Loudon	0	0	2	2	0	0	4
Macon	0	0	0	0	0	0	0
Madison	0	1	3	3	3	4	14
Marion	0	0	0	0	0	0	0
Marshall	0	0	0	0	0	0	0
Maury	1	0	2	2	0	0	5
McMinn	0	0	0	0	1	0	1
McNairy	0	0	0	0	0	0	0
Meigs	0	0	0	0	0	0	0
Monroe	1	1	0	0	1	0	3
Montgomery	3	4	2	2	4	3	18
Moore	0	0	0	0	0	0	0
Morgan	0	0	0	0	0	0	0
Obion	1	1	0	0	1	1	4
Overton	0	0	0	0	0	0	0
Perry	0	0	0	0	0	0	0
Pickett	0	0	0	0	0	0	0
Polk	0	0	0	0	1	0	1
Putnam	0	4	2	2	2	0	10
Rhea	0	0	0	0	1	0	1

Roane	0	1	1	1	1	1	5
Robertson	1	3	0	0	1	1	6
Rutherford	1	8	7	7	9	2	34
Scott	0	0	0	0	0	0	0
Sequatchie	0	0	0	0	0	0	0
Sevier	1	1	7	7	2	1	19
Shelby	4	20	15	15	12	9	75
Smith	0	0	0	0	0	0	0
Stewart	0	0	0	0	0	0	0
Sullivan	4	2	3	3	1	1	14
Sumner	0	0	1	1	3	1	6
Tipton	0	0	0	0	0	0	0
Trousdale	0	0	0	0	0	0	0
Unicoi	0	2	0	0	1	0	3
Union	0	0	0	0	0	0	0
Van Buren	0	0	0	0	0	0	0
Warren	0	0	0	0	0	0	0
Washington	1	0	3	3	1	5	13
Wayne	0	0	0	0	0	0	0
Weakley	1	0	0	0	2	0	3
White	0	1	0	0	0	0	1
Williamson	0	2	4	4	2	2	14
Wilson	1	1	5	5	1	0	13
Total Filed Cases	47	120	136	136	120	73	632

The counties that had the greatest number of complaints (counties that are also the most populous) that had reached resolution had a mixture of settlements and conciliation of the issue at hand and of a finding with no fault.

Table 17, Tennessee Counties with the Greatest Number of Complaints

County	Conciliation/Settlement	% Conciliated or Settled	No Cause	% No Cause	Total
Anderson	3	43%	3	43%	7
Bedford	0	0%	2	100%	2
Blount	6	43%	4	29%	14
Bradley	6	60%	2	20%	10
Campbell	0	0%	0	0%	1
Carroll	1	50%	0	0%	2
Carter	1	20%	3	60%	5
Cheatham	2	40%	3	60%	5
Chester	1	100%	0	0%	1
Coffee	2	33%	4	67%	6

Crockett	1	100%	0	0%	1
Cumberland	0	0%	2	100%	2
Davidson	48	41%	29	25%	117
Decatur	0	0%	2	100%	2
DeKalb	2	67%	0	0%	3
Dickson	3	33%	1	11%	9
Dyer	6	50%	2	17%	12
Gibson	3	38%	3	38%	8
Grainger	3	100%	0	0%	3
Hamblen	2	25%	2	25%	8
Hamilton	14	32%	16	36%	44
Hardeman	0	0%	0	0%	1
Hardin	1	100%	0	0%	1
Hawkins	0	0%	1	50%	2
Haywood	1	100%	0	0%	1
Henderson	0	0%	1	33%	3
Henry	4	80%	0	0%	5
Hickman	0	0%	1	50%	2
Humphreys	0	0%	1	100%	1
Jefferson	0	0%	1	100%	1
Knox	27	35%	15	19%	78
Lake	1	100%	0	0%	1
Lauderdale	1	50%	1	50%	2
Lawrence	0	0%	1	33%	3
Lewis	1	100%	0	0%	1
Lincoln	0	0%	0	0%	1
Loudon	2	50%	0	0%	4
Madison	1	7%	9	64%	14
Maury	3	60%	2	40%	5
McMinn	0	0%	0	0%	1
Monroe	1	33%	0	0%	3
Montgomery	7	39%	4	22%	18
Obion	1	25%	1	25%	4
Polk	0	0%	0	0%	1
Putnam	2	20%	4	40%	10
Rhea	1	100%	0	0%	1
Roane	3	60%	0	0%	5
Robertson	2	33%	2	33%	6
Rutherford	14	41%	9	26%	34
Sevier	10	53%	4	21%	19
Shelby	22	29%	25	33%	75
Sullivan	7	50%	1	7%	14
Sumner	4	67%	1	17%	6

Unicoi	0	0%	1	33%	3
Washington	5	38%	4	31%	13
Weakley	1	33%	2	67%	3
White	1	100%	0	0%	1
Williamson	3	21%	3	21%	14
Wilson	6	46%	3	23%	13
Total Filed Cases	236	37%	175	28%	632

Source: Tennessee Human Rights Commission

Note: Disposition of other complaints may include the following outcomes: Administrative Closure; Charge or FHAP Caused; Conciliation/Settlement; No Cause; Referred to HUD; Withdrawn after Resolution; Open.

Appendix A: Counties over the Disproportionate Share Threshold for Mortgage Loan Denials and HALs

	Mortgage Loans Denied			HALs		
	All Applicants	Black	Hispanic	All Applicants	Black	Hispanic
Anderson	17.64%	21.74%	22.81%	9.31%	10.87%	7.02%
Bedford	15.46%	24.24%	19.23%	8.22%	12.12%	16.35%
Benton	26.39%	75.00%	66.67%	21.90%	25.00%	0.00%
Bledsoe	43.84%	N/A	N/A	32.42%	N/A	0.00%
Blount	14.59%	14.63%	18.46%	4.41%	3.66%	4.62%
Bradley	16.10%	19.51%	17.49%	8.49%	9.76%	10.38%
Campbell	31.13%	12.50%	41.67%	17.57%	N/A	33.33%
Cannon	19.80%	0.00%	100.00%	11.31%	100.00%	0.00%
Carroll	21.86%	28.57%	40.00%	23.43%	35.71%	30.00%
Carter	20.35%	57.14%	11.76%	17.13%	14.29%	17.65%
Cheatham	16.49%	33.33%	16.13%	6.18%	0.00%	6.45%
Chester	19.16%	26.32%	66.67%	14.81%	10.53%	0.00%
Claiborne	33.25%	66.67%	42.86%	19.87%	N/A	28.57%
Clay	16.95%	N/A	0.00%	32.20%	N/A	33.33%
Cocke	25.81%	25.00%	50.00%	7.53%	0.00%	10.00%
Coffee	15.37%	34.29%	5.45%	8.49%	20.00%	20.00%
Crockett	22.14%	52.38%	66.67%	16.55%	9.52%	38.10%
Cumberland	15.36%	20.00%	19.35%	5.80%	N/A	22.58%
Davidson	13.38%	29.46%	24.18%	6.16%	15.97%	10.83%
Decatur	24.63%	0.00%	25.00%	24.25%	33.33%	75.00%
DeKalb	21.61%	0.00%	26.67%	14.35%	0.00%	26.67%
Dickson	14.98%	31.25%	28.00%	8.09%	9.38%	2.00%
Dyer	17.66%	39.29%	15.56%	12.72%	14.29%	6.67%
Fayette	9.77%	20.79%	13.51%	7.92%	9.68%	10.81%
Fentress	28.96%	N/A	16.67%	16.12%	N/A	66.67%
Franklin	16.36%	10.71%	11.54%	8.18%	3.57%	11.54%
Gibson	16.45%	48.31%	17.14%	10.82%	12.36%	20.00%
Giles	24.00%	47.37%	27.27%	10.00%	18.42%	0.00%
Grainger	24.62%	N/A	30.00%	14.42%	0.00%	10.00%
Greene	25.50%	29.41%	57.69%	8.47%	17.65%	3.85%
Grundy	32.57%	N/A	0.00%	39.09%	N/A	28.57%
Hamblen	18.21%	23.08%	37.18%	7.35%	0.00%	7.69%
Hamilton	13.83%	31.83%	19.23%	5.92%	16.95%	8.74%
Hancock	44.55%	N/A	N/A	27.72%	N/A	N/A
Hardeman	24.22%	33.72%	33.33%	22.65%	26.74%	0.00%
Hardin	18.69%	42.86%	50.00%	9.13%	0.00%	N/A
Hawkins	25.79%	75.00%	29.41%	12.69%	25.00%	0.00%
Haywood	18.89%	22.73%	11.76%	18.89%	16.36%	35.29%
Henderson	17.55%	8.00%	14.29%	12.37%	12.00%	28.57%

Henry	19.61%	38.10%	31.25%	15.19%	0.00%	25.00%
Hickman	26.36%	100.00%	20.00%	11.44%	100.00%	20.00%
Houston	27.85%	100.00%	16.67%	14.77%	N/A	N/A
Humphreys	13.26%	20.00%	14.29%	14.93%	0.00%	0.00%
Jackson	28.89%	N/A	0.00%	20.89%	N/A	0.00%
Jefferson	22.71%	54.55%	38.46%	7.05%	N/A	11.54%
Johnson	26.27%	N/A	40.00%	15.29%	N/A	60.00%
Knox	12.89%	25.41%	19.59%	5.21%	11.07%	7.05%
Lake	32.20%	20.00%	N/A	23.73%	20.00%	N/A
Lauderdale	27.91%	32.43%	37.50%	23.06%	24.32%	75.00%
Lawrence	21.59%	33.33%	11.76%	6.90%	11.11%	5.88%
Lewis	28.10%	50.00%	9.09%	10.33%	0.00%	27.27%
Lincoln	18.17%	10.00%	15.79%	14.92%	23.33%	15.79%
Loudon	14.82%	37.50%	17.89%	4.44%	0.00%	5.69%
Macon	15.64%	50.00%	35.29%	26.72%	0.00%	52.94%
Madison	14.80%	29.09%	23.16%	8.81%	16.19%	8.42%
Marion	28.77%	30.00%	0.00%	20.00%	45.00%	18.18%
Marshall	18.49%	42.86%	16.67%	9.63%	11.43%	29.63%
Maury	13.93%	21.23%	18.91%	8.07%	13.68%	10.95%
McMinn	21.32%	27.27%	19.44%	18.02%	27.27%	8.33%
McNairy	26.12%	38.46%	8.33%	18.43%	19.23%	16.67%
Meigs	28.47%	0.00%	N/A	13.19%	N/A	25.00%
Monroe	27.52%	33.33%	31.03%	11.59%	11.11%	13.79%
Montgomery	12.15%	18.60%	12.96%	3.16%	4.65%	2.48%
Moore	16.13%	0.00%	N/A	10.75%	N/A	N/A
Morgan	36.50%	100.00%	25.00%	21.34%	100.00%	50.00%
Obion	23.45%	33.33%	76.92%	17.93%	19.05%	38.46%
Overton	19.21%	N/A	0.00%	7.37%	N/A	0.00%
Perry	30.88%	N/A	0.00%	26.47%	N/A	100.00%
Pickett	31.25%	N/A	N/A	12.50%	N/A	N/A
Polk	51.75%	N/A	0.00%	14.82%	N/A	0.00%
Putnam	15.75%	10.00%	16.18%	6.78%	0.00%	16.18%
Rhea	23.42%	25.00%	14.81%	13.51%	0.00%	7.41%
Roane	18.38%	25.00%	5.56%	7.58%	12.50%	11.11%
Robertson	13.65%	33.94%	14.39%	7.80%	10.09%	10.07%
Rutherford	11.66%	21.16%	20.05%	8.34%	14.94%	11.93%
Scott	37.88%	N/A	N/A	37.05%	N/A	N/A
Sequatchie	28.46%	N/A	85.71%	22.36%	N/A	57.14%
Sevier	28.05%	36.00%	42.53%	6.53%	4.00%	8.05%
Shelby	14.23%	30.27%	19.18%	8.17%	18.13%	10.40%
Smith	20.69%	16.67%	28.57%	23.17%	16.67%	28.57%
Stewart	27.57%	66.67%	42.86%	10.75%	N/A	14.29%
Sullivan	17.71%	42.42%	25.74%	13.50%	16.67%	16.83%
Sumner	11.80%	22.04%	18.13%	7.01%	12.47%	11.73%
Tipton	15.43%	23.88%	17.39%	6.49%	8.96%	6.52%

Trousdale	17.92%	15.38%	33.33%	18.24%	23.08%	N/A
Unicoi	24.15%	N/A	42.11%	13.37%	N/A	10.53%
Union	26.20%	33.33%	0.00%	11.47%	0.00%	0.00%
Van Buren	32.26%	N/A	N/A	26.61%	N/A	100.00%
Warren	19.52%	35.00%	27.27%	7.71%	0.00%	11.36%
Washington	18.16%	16.67%	21.53%	9.27%	6.67%	8.33%
Wayne	22.83%	N/A	N/A	14.67%	N/A	40.00%
Weakley	24.46%	46.15%	56.25%	11.93%	7.69%	6.25%
White	23.82%	0.00%	33.33%	14.34%	37.50%	22.22%
Williamson	9.35%	20.96%	15.69%	2.66%	4.58%	6.42%
Wilson	11.82%	22.76%	16.54%	5.94%	4.81%	4.51%