



ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

Osceola County HOME Consortium
Osceola County
City of Kissimmee

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ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE



Osceola County Board of County Commissioners



City of Kissimmee



Osceola County Human Services Department

In partnership with:

City of Kissimmee Development Services Department

OSCEOLA COUNTY HOME CONSORTIUM: Osceola County & City of Kissimmee ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

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EXECUTIVE SUMMARY

The Osceola County HOME Consortium, in its efforts to proactively further fair housing choice throughout Osceola County and the City of Kissimmee, is adopting this *Analysis of Impediments to Fair Housing Choice (AI)* in order to successfully identify and resolve any impediments or barriers negatively affecting our communities and citizens. This plan has been constructed to illustrate the various issues and trends affecting fair housing choice throughout our County. *The AI* documents Osceola County's existing fair housing conditions and how local, private and federal resources will be used to address the identified needs. Throughout the chapters of this document, characteristics such as population growth, home mortgage disclosure data, income variances, and racial/ethnic data will be discussed in detail in order to identify the demographically driven trends occurring in our communities. In the past, the AI was a component of the Five-Year Consolidated Plan required by the U.S. Department of Housing and Urban Development (HUD), but more recently the Osceola County HOME Consortium and its agency partners are working together to development this detailed analysis as a standalone document in conjunction with the Five-Year Consolidated Plan. HUD desires that the AI serves as a substantive, logical basis for fair housing planning; provide essential and detailed information to policy makers, administrative staff, housing providers, lenders, fair housing advocates; and assist in building public support for fair housing efforts. The Osceola County HOME Consortium, who administers HUD funded housing programs for the County and the City of Kissimmee, will work in partnership with local government departments and stakeholders to continuously update this AI to ensure that any new impediments identified overtime with have a necessary and timely resolution.

Chapter 1 – Introduction, Purpose and Scope

Overview

Every American is entitled to a decent standard of living free of illegal discrimination. The Osceola County HOME Consortium has taken a strong leadership role in dealing with the issue of fair housing. Equal and free access to housing is fundamental in achieving personal, educational and employment goals. Two of the most pivotal events in furthering fair housing were the creation of the Federal Housing Administration in 1934 and the passage of the Fair Housing Act in 1968. These two events lead to housing becoming affordable and available to a wide range of Americans. The U.S. Department of Housing and Urban Development (HUD) has continuously promoted this effort over time by encouraging federal grant program participants to maximize fair housing opportunities through a variety of fairs, workshops and events within their communities.

The purpose of the *Analysis of Impediments to Fair Housing Choice (AI)* is to provide a record of fair housing in Osceola County and Kissimmee and the strategies designed to mitigate and/or eliminate the impediments to fair housing choice. The AI also facilitates housing planning, provides essential information to policy makers, housing providers, lenders and fair housing advocates and assists in building support for fair housing efforts. Impediments to fair housing are defined as any actions, omissions, or decisions that are taken which restrict housing opportunities for individuals or families from all segments of the population.

Fair Housing Planning consists of the following components:

1. An Analysis of Impediments to Fair Housing Choice;
2. Actions to address the effects of the identified impediments;
3. Maintenance of records to support the affirmatively furthering fair housing certification.

Conducting an Analysis of Impediments to Fair Housing Choice is a required component of certification and involves the following:

1. A review of the state's laws, regulations, and administrative policies, procedures, and practices;
2. An assessment of how these laws affect the location, availability, and accessibility of housing;
3. An evaluation of conditions, both public and private, affecting fair housing choice for all protected classes;
4. An assessment of the availability of affordable, accessible housing.

Definitions and Explanation of Acronyms

The following definitions were found in HUD's Fair Housing Planning Guide (FHPG). The FHPG serves as HUD's guidance on preparation of an AI for state and local entities receiving federal funds.

Fair Housing: Fair housing is a condition in which individuals of similar income levels in the same housing market have a like range of housing choice available to them regardless of age, race, color, ancestry, national origin, religion, sex, disability, marital state, familial status, source of income, sexual orientation, or any other arbitrary factor.

Affirmatively Furthering Fair Housing (AFFH): HUD's requirements of recipients of federal funds to do following:

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

Equal Opportunity: Right guaranteed by both federal and many state laws against any discrimination in employment, education, housing or credit rights due to a person's race, color, sex (or sometimes sexual orientation), religion, national origin, age or handicap.

Impediments to fair housing choice:

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

Disparate Impact: A theory of liability that prohibits using a facially neutral practice that has an unjustified adverse impact on members of a protected class. A facially neutral practice is one that does not appear to be discriminatory on its face; rather it is one that is discriminatory in its application or effect.

The basic notion is that housing choice should not be restricted because of one's demographic characteristics, a number of which are defined in law. While this notion is simple, the causes creating barriers are complex and complicated, and very difficult to determine conclusively. At one end, it includes overt acts of discrimination by individuals against another. There are also more institutionalized practices that can

undermine “fair housing” and “equal housing opportunity.” These practices can occur in both the private housing and governmental programs. Given the inherent difficulties in precisely measuring potential problems of the lack of “fair housing” and “equal housing opportunity,” this report examines a number of direct and indirect indicators. The overall research method is to use available data collected by fair housing agencies with some general survey data to identify restrictive barriers and practices happening in Osceola County and Kissimmee.

AI – Analysis of Impediments to Fair Housing Choice
HUD – Department of Housing and Urban Development
CDBG – Community Development Block Grant Program
HOME – HOME Investment Partnership Program
ESG – Emergency Solutions Grant Program

Summary of the AI Development Process

HUD requires that the AI include the following components:

- An analysis of demographic, income, housing and employment data;
- An evaluation of the fair housing complaints filed in the jurisdiction;
- A discussion of impediments, if any, in;
 1. the sale of rental of housing,
 2. provision of brokerage services,
 3. financing,
 4. public policies, and
 5. administrative policies for housing and community development activities that affect housing choice for minorities;
- An assessment of current fair housing resources;
- Conclusions and Recommendations

To develop this AI, the Osceola County HOME Consortium collected and analyzed a variety of data resources, including using a survey specifically created for this plan, to gain specialized input from key stakeholders, case and complaint data, public perception, demographic data and public policies that may have an impact on housing choice, which are further described below in the *Data and Methodology* portion of this chapter.

In addition to identifying impediments to fair housing choice, the Osceola County HOME Consortium has documented a reasonable recommendation for action to eliminate the impediments that limit residents to rent or own housing, regardless of their inclusion in a protected class.

Scope of Analysis and Organization of Plan

This AI is divided into six sections:

- County- and City-wide analysis of demographical data and housing needs
- County- and City-level analysis of conditions and trends impacting fair housing choice
- Federal, State and Local-level analysis of laws, policies and practices affecting fair housing choice
- County- and City-wide evaluation of complaints relating to fair housing choice
- Identification of impediments and recommended actions for resolution
- Documentation of results from public participation efforts and conclusion

The County- and City-wide analysis of demographic data and housing needs provides an overview of demographic information analyzed at the county and city levels including population growth, age and gender, racial and ethnic composition, nativity and poverty rates. In addition, household data is provided on a number of housing units, household tenure, vacancy rates and housing burden. Existing conditions, including depletion of resources available for affordable housing, projected loss of subsidized housing, and patterns of lending foreclosures are analyzed to document the impact on fair housing choice.

The County and City-level analysis of conditions and trends impacting fair housing choice provides an in-depth view of current lending and real estate practices, jurisdictional representation and availability of resources, and enforcement of fair housing laws.

The Federal, State and Local-level analysis of laws, policies and practices affecting fair housing choice provides an in-depth view of how public sector rules and regulations enable or prohibit jurisdictions and private sector housing providers from achieving fair housing choice in their communities.

The County- and City-wide evaluation of complaints relating to fair housing choice provides examples of documented instances, collected by fair housing agencies, of fair housing choice violations and actions taken to resolve the identified impediment.

Included in this analysis, is a definitive list of current impediments identified throughout the AI process and recommended actions for each impediment to resolve or eliminate the barrier to fair housing choice.

Also included in the conclusion of this analysis, is a summary of comments collected during the public meeting that was conducted during the development of this report. These comments were carefully evaluated and utilized during the decision-making process of determining feasible recommended actions for each impediment.

Overview of County and City CDBG, HOME, and ESG Programs

This section provides an overview of County and City administered HUD funded grant programs and the implications they have on the development and implementation of the Osceola County HOME Consortium AI.

Community Development Block Grant Program (CDBG)

Relevant Authorities: Entitlement jurisdictions must adhere to the Federal regulations that govern the CDBG Program [24 CFR Part 570].

Geographic and Demographic Conditions: The Community Development Block Grant (CDBG) Program, administered by Osceola County and the City of Kissimmee, operates County- and City-wide and receives a direct annual allocation of grant funds from HUD. These Federal funds are allocated to projects and activities that target low- to moderate-income (80% or below Area Median Income) households within the County and its jurisdictions. Eligible projects and activities are described in the Five-Year Osceola County HOME Consortium Five-Year Consolidated Plan.

Eligible Activities: In order to respond to the needs and priorities of jurisdictions County-wide, the Osceola County HOME Consortium selects broad housing and community development funding goals which include, but are not limited to affordable housing development, housing preservation, public facilities and infrastructure improvements, public services and planning and administration.

HOME Investment Partnerships Program (HOME)

Relevant Authorities: Entitlement jurisdictions must adhere to the Federal regulations that govern the HOME Program [24 CFR Part 92].

Geographic and Demographic Conditions: The HOME Program, administered by Osceola County, as the lead agency and the City of Kissimmee as a partner, operates County- and City-wide and receives a direct annual allocation of grant funds from HUD. These Federal funds are allocated to affordable housing projects and activities that target low- to moderate-income (80% or below Area Median Income) households within the County and its jurisdictions. Eligible projects and activities are described in the Five-Year Osceola County HOME Consortium Five-Year Consolidated Plan.

Eligible Activities: In order to respond to the needs and priorities of jurisdictions County-wide and City-wide, the Osceola County HOME Consortium selects broad funding goals which include, but are not limited to affordable housing new construction, affordable housing rehabilitation, direct financial housing assistance, planning and administration.

Emergency Solutions Grant Program (ESG)

Relevant State Authorities: Entitlement jurisdictions must adhere to the Federal regulations that govern the ESG Program {McKinney-Vento Home Assistance Act as amended by S.896 The Homeless Emergency Assistance and Rapid Transition Housing (HEARTH) Act of 2009 [24 CFR Part 576]}.

Geographic and Demographic Conditions: The ESG Program is administered by Osceola County, is eligible to receive a direct allocation from HUD. Eligible beneficiaries must meet the “homeless” definition in 24 CFR 576.2. Rapid re-housing assistance beneficiaries must also meet the requirements described in 24 CFR 576.104. Local governments have the freedom to establish further eligibility criteria for program beneficiaries in accordance with 24 CFR 576.400 (e). All local government and non-profit organization recipients must consult with the Continuum of Care Consortium(s) operating within the jurisdiction before determining how ESG funds are allocated.

Eligible Activities: There are six (6) main eligible components under the ESG Program. The components are Street Outreach, Emergency Shelter, Homelessness Prevention, Rapid Re-Housing, Data Collection and Administration. Below is a description of the eligible activities and costs under each component:

- **Street Outreach** – Essential Services related to reaching out to unsheltered homeless individuals and families, connecting them with emergency shelter, housing, or critical services, and providing them with urgent, non-facility-based care. Eligible costs include engagement, case management, emergency health and mental health services, transportation, and services for special populations. (For more information see 24 CFR 576.01)
- **Emergency Shelter** – Renovation, including major rehabilitation or conversion, of a building to serve as an emergency shelter. The emergency shelter must be owned by a government entity or private non-profit organization. The shelter must serve homeless persons for at least 3 or 10 years, depending on the type of renovation and the value of the building. NOTE: Property Acquisition and New Construction are ineligible ESG activities. Essential Services include case management, childcare, education services, employment assistance and job training, outpatient health services, legal services, life skills training, mental health services, substance abuse treatment services, transportation and services for special populations. Shelter Operations include maintenance, rent, repair, security, fuel, equipment, insurance, utilities, food, furnishings, and supplies necessary for operation of an emergency shelter. Hotel vouchers are included as an eligible cost when no appropriate emergency shelter is available for a homeless family or individual. (For more information see 24 CFR 576.02)

- **Homelessness Prevention** – Housing relocation and stabilization services and short-and/or medium-term rental assistance as necessary to prevent the individual or family from moving to an emergency shelter, or a place not meant for human habitation. The costs of homelessness prevention are only eligible to the extent that the assistance is necessary to help the program participant regain stability in their current housing or move into permanent housing and achieve stability in that housing. Eligible costs under this component include rental assistance and rental arrears; financial assistance for rental application fees, security deposits, utility payments, last month's rent and moving costs; and Services including housing search and placement, housing stability case management, landlord-tenant mediation, tenant legal services and credit repair. (For more information see 24 CFR 576.103)
- **Rapid Re-Housing** – Housing relocation and stabilization services and/or short-and/or medium rental assistance as necessary to help individuals or families living in shelters or in places not meant for human habitation move as quickly as possible into permanent housing and achieve stability in that housing. Eligible costs under this component include rental assistance and rental arrears; financial assistance for rental application fees, security deposits, utility payments, last month's rent and moving costs; and Services including housing search and placement, housing stability case management, landlord-tenant mediation, tenant legal services and credit repair. (For more information see 24 CFR 576.104)
- **Data Collection (HMIS)** – ESG funds may be used to pay for the costs of participating in and contributing to the Homeless Management Information System (HMIS) designated by the Continuum of Care for the area. (For more information see 24 CFR 576.107)
- **Administration** – Up to 7.5 percent of an ESG recipient's allocation can be used for Administration purposes. Eligible Administration activities include general management, oversight, and coordination; reporting on the program; the costs associated with providing training on ESP requirements and attending HUD sponsored ESG trainings; the costs of preparing and amending the ESG and homelessness section of the Consolidated Plan, Annual Action Plan and CAPER; and the of carrying out environmental review responsibilities. State recipients are also required to share administrative funds with their recipients that are local governments and non-profit organizations.

Data and Methodology

The AI is a required element of the Consolidated Planning process and for receiving formula grant funding from HUD. The Osceola County HOME Consortium must complete an AI and continuously update it when new impediments are identified. The Osceola County HOME Consortium used several verifiable sources to produce the qualitative and quantitative data while completing its analysis. Some of those data sources include:

- The U.S. Census Bureau Quickfacts, 2018 and 2019
- American Community Survey, 2018
- Shimberg Center for Housing Studies Clearing House Data
- Community Legal Services of Mid-Florida (Kissimmee Office)
- University of Florida Bureau of Economic and Business Research
- Comprehensive Housing Affordability Strategy (CHAS)

Information regarding fair housing complaints and other private sector trends that could have a negative impact on fair housing choice was collected in consultation with Community Legal Services of Mid-Florida that serves citizens of Osceola County and the City of Kissimmee.

Chapter 2 – County and City Demographical Analysis

This section of the AI uses data sets from a variety of sources (*outlined in Chapter 1*) to highlight population, age, ethnicity, income and education demographics and housing statistics in Osceola County and the City of Kissimmee.

POPULATION ESTIMATES

The U.S. Census Bureau 1-Year Estimate for 2019 showed that Osceola County had a total population of approximately 375,751 people in 2019, an increase of 39% from 2010.

The U.S. Census Bureau 1-Year Estimate for 2019 showed that the City of Kissimmee had a total population of approximately 72,717 people in 2019, an increase of 22% from 2010.

AGE AND GENDER DEMOGRAPHICS

Table 2-1a below; depicts countywide population data based on gender and age demographics. According to the data provided, persons between the ages of 18- and 65-years old account for the highest concentration in Osceola County with a total estimated population of 211,172 persons. According to the data provided, females slightly outnumber males by an estimated 751 persons and account for 50.1 percent of the total population. The survey denotes that this data has a +/-0.1 percent margin of error.

Table 2-1a Gender and Age Distribution of People in Osceola County 2019		
	Estimated Total Population	Percentage of Total Population
Female	188,251	50.1%
Male	187,500	48.9%
Persons under 5 years	23,297	6.2%
Persons under 18 years	90,556	24.1%
Persons between 18 and 65 years	211,172	56.2%
Persons over 65 years	50,726	13.5%

Source: U.S. Census Bureau, 2019 QuickFacts

Table 2-1b below; depicts citywide population data based on gender and age demographics. According to the data provided, persons between the ages of 18- and 65-years old account for the highest concentration in the City of Kissimmee with a total estimated population of 42,321 persons. According to the data provided, males slightly outnumber females by an estimated 437 persons and account for 50.3 percent of the total population. The survey denotes that this data has a +/-0.1 percent margin of error.

Table 2-1b Gender and Age Distribution of People in the City of Kissimmee 2019		
	Estimated Total Population	Percentage of Total Population
Female	36,140	49.7%
Male	36,577	50.3%
Persons under 5 years	5,017	6.9%
Persons under 18 years	17,598	24.2%
Persons between 18 and 65 years	42,321	58.2%
Persons over 65 years	7,781	10.7%

Source: U.S. Census Bureau, 2019 QuickFacts

RACIAL AND ETHNIC COMPOSITION

Table 2-2a, below, depicts countywide population data based on race demographics. According to the data provided, persons who chose Hispanic or Latino as their race account for the second highest concentration in Florida with an estimated total population in Osceola County of 203,445 persons, making up 55.3 percent of the county's population. The survey denotes that this data has a +/-0.1 percent margin of error.

Table 2-2a Race Distribution of People in Osceola County 2019		
Race	Estimated Total Population	Percentage of Estimated Total Population
White	111,496	30.3%
Black or African American	35,084	9.5%
American Indian and Alaska Native	300	0.1%
Asian	9,681	2.6%
Native Hawaiian and Other Pacific Islander	16	<0.1%
Hispanic or Latino	203,445	55.3%
Other	1,904	0.5%
Two+	6,064	1.7%

Source: U.S. Census Bureau, 2019 QuickFacts

Table 2-2b, below, depicts citywide population data for the City of Kissimmee based on race demographics. According to the data provided, persons who chose Hispanic or Latino as their race account for the second highest concentration in Florida with an estimated total population in the City of Kissimmee of 49,520 persons, making up 68.1 percent of the City's population, making it the largest group in the City. The survey denotes that this data has a +/-0.1 percent margin of error.

Table 2-2b Race Distribution of People in the City of Kissimmee 2019		
Race	Estimated Total Population	Percentage of Estimated Total Population
White	50,102	68.9%
Black or African American	8,653	11.9%
American Indian and Alaska Native	72	0.1%
Asian	2,109	2.9%
Native Hawaiian and Other Pacific Islander	12	<0.1%
Hispanic or Latino	49,520	68.1%
Two+	3,781	5.2%

Source: U.S. Census Bureau, 2019 QuickFacts

NATIVITY AND FOREIGN-BORN ESTIMATES

Table 2-3, below, depicts countywide population data based on nativity and foreign-born demographics. An estimated 81 percent of the people living in Osceola County in 2018 were native residents of the United States. An estimated 19 percent of the people living in Osceola County in 2018 were foreign born. According to the data provided, the highest concentration of foreign-born people living in Osceola County are from the Latin American category, making up 78.8 percent of the foreign-born population. Of this group, 33.6 percent came from the Caribbean, 12.8 percent from Central America including Mexico, and 32.4 percent came from South America.

Table 2-3a Region of Birth and Percentage of Foreign Born Population in Osceola County 2018	
Region of Birth	Distribution of Foreign-Born Population
North American	1%
Latin American	78.8%
Oceania	0.3%
Africa	3.6%
Asia	9.1%
Europe	7.3%
Total Foreign Born:	19% of total population
United States	81% of total population

Source: U.S. Census Bureau, ACS 2018 5-year

An estimated 77.6 percent of the people living in the City of Kissimmee in 2018 are native residents of the United States. An estimated 22.4 percent of the people living in Kissimmee in 2018 were foreign born. According to the data provided, the highest concentration of foreign-born people living in the City of Kissimmee are from the

Latin American category, making up 84.2 percent of the foreign-born population. Of this group, 33.1 percent came from the Caribbean, 14 percent from Central America including Mexico, and 37.1 percent came from South America.

Table 2-3b Region of Birth and Percentage of Foreign Born Population in the City of Kissimmee 2018	
Region of Birth	Distribution of Foreign-Born Population
North American	0.5%
Latin American	84.2%
Oceania	0%
Africa	3.7%
Asia	8.0%
Europe	3.6%
Total Foreign Born:	22.4% of total population
United States	77.6% of total population

Source: U.S. Census Bureau, ACS 2018 5-year

LIMITED ENGLISH PROFICIENCY HOUSEHOLDS

Table 2-4a, below, depicts population data based on Limited English Proficiency households where persons with language proficiency other than English is spoken at home, specifically with children 5-17 years old. Among this group in Osceola County, 47.7 percent spoke a language other than English at home. Of those people speaking a language other than English at home, where there are children ages 5-17, 41.9 percent spoke Spanish and 5.8 percent spoke some other language. According to the data provided, Spanish-speaking households make up the highest percentage of non-English speaking households in Osceola County at an estimated 41.9 percent.

Table 2-4a Percent of Households with Persons Who Speak a Language other than English, ages 5-17 in Osceola County 2018	
Primary Language Spoken at Home	Percentage (%) of Households
English only	
Spanish	41.9%
Other Indo-European languages	3.9%
Asian and Pacific Islander languages	0.4%
Other languages	1.6%

Source: U.S. Census Bureau, ACS 2018 5-year

Table 2-4b, below, depicts population data based on Limited English Proficiency households where persons with language proficiency other than English is spoken at

home, specifically with children 5-17 years old. Among this group in the City of Kissimmee, 64.8 percent spoke a language other than English at home. Of those people speaking a language other than English at home, where there are children ages 5-17, 61.7 percent spoke Spanish and 3.2 percent spoke some other language. According to the data provided, Spanish-speaking households make up the highest percentage of non-English speaking households in the City of Kissimmee at an estimated 61.7 percent.

Table 2-4b Percent of Households with Persons Who Speak a Language other than English, ages 5-17 in City of Kissimmee 2018	
Primary Language Spoken at Home	Percentage (%) of Households
English only	35.2%
Spanish	61.7%
Other Indo-European languages	1.3%
Asian and Pacific Islander languages	0.8%
Other languages	1.1%

Source: U.S. Census Bureau, ACS 2018 5-year

Table 2-5a, below, depicts county-wide population data based on Limited English Proficiency households where persons with language proficiency other than English is spoken at home, specifically with adults 18 + years of age. Among this group in Osceola County, 54.6 percent spoke a language other than English at home. Of those people speaking a language other than English at home, where there are children ages 5-17, 47.5 percent spoke Spanish and 7.1 percent spoke some other language. According to the data provided, Spanish-speaking households make up the highest percentage of non-English speaking households in Osceola County at an estimated 47.5 percent.

Table 2-5a Percent of Households with Persons Who Speak a Language other than English, adults 18+ in Osceola County 2018	
Primary Language Spoken at Home	Percentage (%) of Households
English only	
Spanish	47.5%
Other Indo-European languages	4%
Asian and Pacific Islander languages	1.6%
Other languages	1.5%

Source: U.S. Census Bureau, ACS 2018 5-year

Table 2-5b, below, depicts citywide population data for the City of Kissimmee based on Limited English Proficiency households where persons with language proficiency other than English is spoken at home, specifically with adults 18 + years of age. Within this group, 65.2 percent spoke a language other than English at home. Of those people

speaking a language other than English at home, where there are children ages 5-17, 59.2 percent spoke Spanish and 6.1 percent spoke some other language. According to the data provided, Spanish-speaking households make up the highest percentage of non-English speaking households in Osceola County at an estimated 59.2 percent.

Table 2-5b Percent of Households with Persons Who Speak a Language other than English, adults 18+ in the City of Kissimmee 2018	
Primary Language Spoken at Home	Percentage (%) of Households
English only	34.8%
Spanish	59.2%
Other Indo-European languages	3.6%
Asian and Pacific Islander languages	1.1%
Other languages	1.4%

Source: U.S. Census Bureau, ACS 2018 5-year

HOUSEHOLD INCOME LEVELS

Table 2-6a depicts the income levels of Osceola County residents by household. The median income in Osceola County in 2018 was \$50,546. It should be noted that median household income was \$4,916 lower than the median household income for Florida, and \$11,391 less than the U.S. median household income.

Table 2-6a Income Levels of Osceola County Residents		
Subject	Households (total)	Households (%)
Total	102,705	100%
Less than \$10,000	5,864	5.7%
\$10,000 to \$14,999	3,921	3.8%
\$15,000 to \$19,999	5,545	5.4%
\$20,000 to \$24,999	5,296	5.2%
\$25,000 to \$29,999	5,414	5.3%
\$30,000 to \$34,999	6,229	6.1%
\$35,000 to \$39,999	6,258	6.1%
\$40,000 to \$44,999	5,664	5.5%
\$45,000 to \$49,999	6,686	6.5%
\$50,000 to \$59,999	7,174	7.0%
\$60,000 to \$74,999	12,385	12.1%
\$75,000 to \$99,999	11,327	11.0%
\$100,000 to \$124,999	9,683	9.4%
\$125,000 to 149,999	4,243	4.1%
\$150,000 to \$199,999	3,583	3.5%
\$200,000 or More	3,433	3.3%

Median Income (Dollars)	\$50,546	
Per Capita Income (Dollars)	\$22,100	

Source: U.S. Census Bureau, ACS 2018 5-year

Table 2-6b depicts the income levels of City of Kissimmee residents by household. The median household income in the City of Kissimmee in 2018 was \$35,574. It should be noted that median household income was \$19,888 lower than the median household income for Florida, and \$27,605 less than the U.S. median household income in 2018.

Table 2-6b Income Levels of Kissimmee Residents		
Subject	Households (total)	Households (%)
Total		
Less than \$10,000	1,792	8.3%
\$10,000 to \$14,999	1,383	6.4%
\$15,000 to \$19,999	2,553	11.8%
\$20,000 to \$24,999	1,562	7.2%
\$25,000 to \$29,999	1,901	8.8%
\$30,000 to \$34,999	1,406	6.5%
\$35,000 to \$39,999	1,305	6.0%
\$40,000 to \$44,999	671	3.1%
\$45,000 to \$49,999	1,289	6.0%
\$50,000 to \$59,999	1,475	6.8%
\$60,000 to \$74,999	2,875	13.3%
\$75,000 to \$99,999	1,480	6.8%
\$100,000 to \$124,999	1,002	4.6%
\$125,000 to 149,999	424	2.0%
\$150,000 to \$199,999	167	0.8%
\$200,000 or More	321	1.5%
Median Income (Dollars)	\$35,574	

Per Capita Income (Dollars)	\$17,814	
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Source: U.S. Census Bureau, ACS 2018 5-year

POVERTY RATES

Table 2-7a, below, depicts countywide population data based on persons living below the poverty line. An estimated 18.5 percent of children less than eighteen years of age lived below the poverty level compared to only 9.6 percent of people 65 years and over. An estimated 13 percent of all families reported incomes below the poverty level. The national poverty guidelines for 2018 reported that any average household with a family up to four people were living in poverty if their annual household was equal to or less than \$25,100.

Table 2-7a Poverty Rates in Osceola County 2018	
Type of Family or Age Bracket	Percentage (%) of Families below Poverty Level
All families	13%
Related children under 18 years	18.5%
People age 65 and over	9.6%

Source: U.S. Census Bureau, ACS 2018 5-year

Table 2-7b, below, depicts citywide population data based on persons living below the poverty line. An estimated 42 percent of children less than eighteen years of age lived below the poverty level compared to only 19 percent of people 65 years and over. An estimated 26.2 percent of all families reported incomes below the poverty level. The national poverty guidelines for 2018 reported that any average household with a family up to four people were living in poverty if their annual household was equal to or less than \$25,100.

Table 2-7b Poverty Rates in the City of Kissimmee 2018	
Type of Family or Age Bracket	Percentage (%) of Families below Poverty Level
All families	26.2%
Related children under 18 years	42.0%
People age 65 and over	19.0%

Source: U.S. Census Bureau, ACS 2018 5-year

EDUCATION LEVELS

Table 2-8a depicts the highest education level obtained percentage of residents of Osceola County based on gender. Though not displayed in the table, it is worth noting that both male and female attainment where no schooling was completed in Osceola County averages higher than Florida. Furthermore, both male and female attainment of a Bachelor's and a Master's degree fall below the average for the State of Florida. There are less than 1,646 individuals with a Doctorate degree in Osceola County, compared to 182,063 in the State of Florida, or less than 0.9 %. There are no more than 25,264 male and female individuals with an Associate degree in Osceola County, compared to 1,489,510 individuals in the state of Florida, or less than 1.7%.

Table 2-8a Osceola County Education Attainment		
Educational Attainment	Male	Female
	48.2%	51.8%
No schooling completed	2.3%	0.9%
Nursery to 4 th grade	0.1%	0.6%
5 th and 6 th grade	0.2%	0.1%
7 th and 8 th grade	0.3%	0.6%
9 th grade	0.8%	0.6%
10 th grade	1.2%	1.4%
11 th grade	1.2%	0.9%
12 grade, no diploma	1.8%	1.1%
High school graduate (includes GED)	16.2%	15.0%
Some college, less than 1 year	3.0%	2.7%
Some college 1 or more years, no degree	6.4%	7.7%
Associate degree	4.7%	5.7%
Bachelor's degree	6.4%	9.4%
Master's degree	2.4%	3.6%
Professional school degree	0.8%	1.2%
Doctorate degree	0.5%	0.2%

U.S. Census Bureau, ACS 2018 5-year

Table 2-8b depicts the highest education level obtained percentage of residents of the City of Kissimmee based on gender. Though not displayed in the table, it is worth noting that both male and female attainment where no schooling was completed in Kissimmee averages higher than Florida. Furthermore, both male and female attainment of a Bachelor's and a Master's degree fall below the average for the State of Florida. There are less than 146 individuals with a Doctorate degree in the City of Kissimmee, compared to 1,646 in Osceola County, or less than 8.9%. There are approximately 4,811 individuals with an Associate degree in the City of Kissimmee, compared to 25,264 individuals in Osceola County, or less than 19%.

Table 2-8b City of Kissimmee Education Attainment		
Educational Attainment	Male	Female
	49.8%	50.2%
No schooling completed	1.1%	0%
Nursery to 4 th grade	0%	0.8%
5 th and 6 th grade	0.6%	0.3%
7 th and 8 th grade	0%	1.0%
9 th grade	0.6%	0.9%
10 th grade	0.2%	1.3%
11 th grade	2.0%	2.0%
12 grade, no diploma	2.2%	2.0%
High school graduate (includes GED)	20.0%	18.0%
Some college, less than 1 year	0.9%	1.9%
Some college 1 or more years, no degree	8.3%	6.8%
Associates degree	5.6%	3.8%
Bachelor's degree	7.3%	7.8%
Master's degree	0.6%	3.2%
Professional school degree	0.4%	0.2%
Doctorate degree	0.1%	0.1%

U.S. Census Bureau, ACS 2018 5-year

PROJECTED POPULATION GROWTH RATES

Table 2-9, below, depicts city and countywide projected population growth between 2019 and 2030. It was predicted that Osceola County would see an increase in population between 2019 and 2030. The highest population increase between 2019 and 2030 is 43,600, to occur between 2025 and 2030. The lowest population increase is projected to occur between 2019 and 2025 at 33,349 new residents. It was predicted that the City of Kissimmee would see an increase in population between 2019 and 2030. The highest population increase between 2019 and 2030 is 10,814, to occur between 2025 and 2030. The lowest population increase is projected to occur between 2025 and 2030 at 7,658 new residents.

Table 2-9 Projected Population Growth in Osceola County and City of Kissimmee from 2019 to 2030					
Jurisdiction	2019 Actual	2025 Estimates	2025 Projected increase/decrease from 2019	2030 Estimates	2030 Projected increase/decrease from 2025
Osceola	375,751	409,100	+33,349	452,700	+43,600
City of Kissimmee	73,596	84,410	+10,814	92,068	+7,658

Source: University of Florida Bureau of Economic and Business Research, BEBR Volume 47, Bulletin 168, April 2014, Shimborg Center

PRIOR JOB GROWTH 2011-2015

Table 2-10a breaks down the employment sectors and evaluates the overall economic growth within the sector. Osceola County's top 5 business sectors are (1) Arts, Entertainment and Accommodations, (2) Retail Trade, (3) Education and Health Services, (4) Finance, Insurance, and Real Estate, and (5) Professional, Scientific, and Management Services.

Table 2-10a Economic Development and Job Growth in Osceola County					
Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	563	324	1	1	0
Arts, Entertainment, Accommodations	22,391	17,283	27	35	7
Construction	4,183	2,837	5	6	1
Education and Health Care Services	10,423	4,630	13	9	-4
Finance, Insurance, and Real Estate	5,081	2,858	6	6	-1
Information	1,284	187	2	0	-1
Manufacturing	2,558	804	3	2	-2
Other Services	2,613	899	3	2	-1
Professional, Scientific, Management Services	5,156	1,168	6	2	-4
Public Administration	0	0	0	0	0
Retail Trade	12,233	8,046	15	16	1
Transportation and Warehousing	3,286	1,255	4	3	-2
Wholesale Trade	3,264	1,880	4	4	0
Total	73,035	42,171	--	--	--

Source: 2011-2015 ACS (Workers), 2015 Longitudinal Employer-Household Dynamics (Jobs)

Table 2-10b breaks down the employment sectors and evaluates the overall economic growth within the sector. The City of Kissimmee's top 5 business sectors are (1) Arts, Entertainment and Accommodations, (2) Retail Trade, (3) Education and Health Services, (4) Finance, Insurance, and Real Estate, and (5) Professional, Scientific, and Management Services, similar to Osceola County.

Table 2-10b Economic Development and Job Growth in City of Kissimmee					
Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	150	23	1	0	0
Arts, Entertainment, Accommodations	7,810	4,173	28	19	-9
Construction	1,198	1,456	4	7	2
Education and Health Care Services	3,358	5,636	12	26	14
Finance, Insurance, and Real Estate	1,872	1,252	7	6	-1
Information	405	163	1	1	-1
Manufacturing	782	153	3	1	-2
Other Services	849	639	3	3	0
Professional, Scientific, Management Services	1,579	982	6	5	-1
Public Administration	0	0	0	0	0
Retail Trade	4,610	4,905	17	23	6
Transportation and Warehousing	1,029	97	4	0	-3
Wholesale Trade	1,027	246	4	1	-3
Total	24,669	19,725	--	--	--

HOUSEHOLDS BY TENURE

Table 2-11, below, depicts county and city demographic data based on households by tenure. In 2018, the U.S. Census Bureau reported an estimate of 153,495 total occupied households in Osceola County. According to the data provided, 65,615 households are owned and 37,090 are rented. This shows a homeownership rate of 64 percent and a rental rate of 36 percent countywide. In 2018, the City of Kissimmee reported an estimate of 21,606 total occupied households in the city. According to the data provided, 9,946 households are owned and 11,660 are rented. This shows a homeownership rate of 46 percent and a rental rate of 54 percent citywide.

Table 2-11 Osceola County Occupied Households by Tenure, 2018		
Jurisdiction	Tenure Type	Household Count
Osceola County	Owner	65,615
Osceola County	Renter	37,090

City of Kissimmee	Owner	9,946
City of Kissimmee	Renter	11,660

Source: U.S. Census Bureau, ACS 2018 5-year

HOUSING UNITS AND VACANCY RATES

Tables 2-12 and 2-13, below, depict population data for total number of housing units and housing units by type. In 2018, Osceola County had a total of over 153,000 housing units. According to the data provided, approximately 56 percent were single-unit structures, 29 percent were multi-unit structures, and less than 9 percent were mobile homes, boats, recreational vehicles, vans, and other.

Table 2-12 Total Number of Housing Units in Osceola County, 2018	
Jurisdiction	Total Housing Units
Osceola County	153,495
City of Kissimmee	28,995

Source: U.S. Census Bureau, 2018 American Community Survey 5-Year Estimates

Table 2-13a Housing Units by Type in Osceola County 2018	
Type of Housing Unit	Percentage of Housing Units
Single-unit, detached	56%
Single-unit, attached	6%
Multi-unit structures	29%
Mobile Homes, boat, RV, van, etc	9%

Source: U.S. Census Bureau, 2018 American Community Survey 5-Year Estimates

In 2018, the City of Kissimmee had a total of over 28,995 housing units. According to the data provided, approximately 46 percent were single-unit structures, 43 percent were multi-unit structures, and less than 3 percent were mobile homes, boats, recreational vehicles, vans, and other.

Table 2-13b Housing Units by Type in the City of Kissimmee 2018	
Type of Housing Unit	Percentage of Housing Units
Single-unit, detached	46%
Single-unit, attached	8%
Multi-unit structures	43%
Mobile Homes, boat, RV, van, etc	3%

Source: U.S. Census Bureau, 2018 American Community Survey 5-Year Estimates

Table 2-14, below, depicts population data for housing unit vacancy rates. In Osceola County in 2018, there were approximately 50,790 vacant housing units in Osceola County, representing a vacancy rate of 33 percent. These vacancy statistics include seasonal vacancies for persons who claim permanent residency in other states for certain time periods throughout the year.

Table 2-14 Housing Unit Vacancy Rates, 2018				
Jurisdiction	Occupied	Vacant	Percent Vacant	Total Housing Units
Osceola County	102,705	50,790	33%	153,495
City of Kissimmee	21,606	7,389	25.5%	28,995

Source: U.S. Census Bureau, 2018 American Community Survey 5-Year Estimates

HOUSING COST BURDEN

Tables 2-15a and 2-15b, below, depict demographic population data for housing cost burden for Osceola County and the City of Kissimmee, respectfully. Within both Osceola County and the City of Kissimmee, the largest cost burdened group as a percentage of the population, greater than 30% AMI remains the Hispanic population.

Table 2-15a Cost Burden by Demographic - Osceola County				
Housing Cost Burden	<=30% AMI	30-50% AMI	>50% AMI	No / negative income (not computed)
Total	42,104	18,199	17,184	1,400
White	20,915	5,840	4,725	535
Black / African American	3,515	1,870	1,995	185
Asian	1,490	188	384	15
American Indian, Alaska Native	30	15	4	0
Pacific Islander	0	4	25	0
Hispanic	15,320	10,035	9,880	660

Source: 2011-2015 CHAS

Table 2-15b Cost Burden by Demographic - City of Kissimmee				
Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Total	10,390	5,285	4,745	350
White	4,065	1,305	745	60
Black / African American	915	440	485	20
Asian	450	90	120	15
American Indian, Alaska Native	0	0	0	0
Pacific Islander	0	0	0	0

Table 2-15b Cost Burden by Demographic – City of Kissimmee				
Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Hispanic	4,755	3,425	3,350	255

Source: 2011-2015 CHAS

SPECIAL NEEDS POPULATIONS

The University of Florida’s Shimberg Center for Housing Studies defines special needs populations as “persons with disabilities, farmworkers and homeless individuals and families.” The below tables describe the number of persons with disabilities by age group and population with an ambulatory difficulty. Table 2-16, below, depicts total number of households with disabilities within Osceola County and the City of Kissimmee.

Households with Disabilities

Table 2-16 Disability Status in Osceola County and City of Kissimmee

	Total
Osceola County	29,229
City of Kissimmee	not available

Source: Shimberg Center for Housing Studies 2017, Household Demographic Data

Table 2-17, below, depicts household data relating to cost burden, tenure and number of households with persons with disabilities ages fifteen and older. In Osceola County, owner occupied units with 30% or Less Cost Burden where a person with a disability was present made up 44% of the total households. Alternatively, owner occupied units with 30% or Greater Cost Burden where a person with a disability was present made up 50% of the total households. Renter occupied units with 30% or Less Cost Burden where a person with a disability was present made up 30% of the total households. Also, renter occupied units with 30% or Greater Cost Burden made up just 18% of the total households. This same data was not available for the City of Kissimmee.

Table 2-17 Housing Cost Burden, Tenure and Number of Households with a Person(s) with a Disability in Osceola County and City of Kissimmee, 2018			
Jurisdiction	Housing Cost Burden	Tenure	Households with a Person(s) with a disability 15+ years of age
Osceola County	30% or Less Cost Burden	Owner	13,399
Osceola County	30% or Less Cost Burden	Renter	4,104
Osceola County	Greater than 30% Cost Burden	Owner	5,629
Osceola County	Greater than 30% Cost Burden	Renter	2,486
City of Kissimmee	30% or Less Cost Burden	Owner	not available

City of Kissimmee	30% or Less Cost Burden	Renter	not available
City of Kissimmee	Greater than 30% Cost Burden	Owner	not available
City of Kissimmee	Greater than 30% Cost Burden	Renter	not available

Source: Shimberg Center for Housing Studies, University of Florida, 2019

Farmworkers

Table 2-18, below, depicts household data demonstrating the lack of housing units available for farmworker and migrant populations. In Osceola County, the term “unaccompanied” refers to housing units meant for farmworker or migrant individuals and the term “accompanied” refers to housing units meant for farmworker and migrant families. According to the data provided, there is a great need for both unaccompanied and accompanied migrant and seasonal households in Osceola County.

Table 2-18 Farmworker Households in Osceola County, FL	
Jurisdiction	Osceola County
Unaccompanied Migrant Households	122
Existing FL Dept. of Health Permitted Units	160
Need for FL Dept. of Health Permitted Units	-38
Accompanied Migrant Households	65
Existing Housing Assisted Multi-family Units	104
Need for Multifamily Units	-39

Source: Shimberg Center for Housing Studies, University of Florida, 2019

Homeless Individuals and Families

Table 2-19, below, depicts population data relating to the total number of homeless individuals and families with children, by region, in Florida. Homeless individuals in the Northeast Florida Region make up 9.5 percent of the 28,378 total homeless individuals statewide. Homeless families with children make up 18.7 percent of the 43,592 total homeless families statewide.

Table 2-19 Homeless Individuals and Families by Region, 2020		
Region	Individuals	Families with Children
Central (Orange, Osceola and Seminole Counties)	2,686	8,137

Source: Source: Shimberg Center for Housing Studies, University of Florida, 2019

Table 2-20, below, depicts population data relating to homeless transitional and permanent cost-effective units available to serve the homeless population. In Osceola County, according to the data provided, the Central Florida region has the highest number of transitional and permanent supportive housing beds for homeless individuals. The Central Florida region has the highest number of transitional housing units available for homeless families in Florida.

Table 2-20 Homeless Transitional and Permanent Housing Supply, 2014				
Region	Individuals		Families	
	Transitional Housing Beds	Permanent Supportive Housing Beds	Transitional Housing Units	Permanent Supportive Housing Units
Northwest	915	887	177	79
Northeast	683	971	328	299
Central	2,252	2,281	533	285
Southeast	556	719	224	304
South	2,060	2,887	380	910
Southwest	601	410	100	208
Total	7,067	8,155	1,742	2,085

Source: Shimberg Center for Housing Studies, University of Florida, 2014

The data and statistics provided in Chapter 2 reveal pertinent data utilized in the analysis of impediments to fair housing in Osceola County and the City of Kissimmee. Gender and demographics, race distribution, national origin, native language, income, education and growth patterns are presented which provide a foundation of information from which impediment analysis can be evaluated, tested, and ultimately prevented. Chapter 3 provides a closer examination of Osceola County, the City of Kissimmee and their housing markets.

Chapter 3 – Laws, Policies and Furthering Fair Housing

Overview of Federal Fair Housing Laws and Executive Orders

Both federal and state fair housing laws establish protected classes and govern the treatment of these individuals, and are designed to affirmatively further access to housing and community development resources to persons of protected classes. This section provides an overview of these laws.

Title VI of the Civil Rights Act of 1964: Prohibits discrimination on the basis of race, color or national origin in programs and activities receiving federal financial assistance.

Title VIII of the Civil Rights Act of 1968 (Fair Housing Act), as amended: Prohibits discrimination in the sale, rental and financing of dwellings, and in other housing-related transactions, based on:

- race;
- color;
- national origin;
- religion;
- sex;
- familial status (including children under the age of eighteen living with parents or legal custodians, pregnant women and people securing custody of children under the age of eighteen);
- persons with physical, mental and developmental disabilities.

Specifically, in the sale and rental of housing no one may take any of the following actions based on these protected classes:

- refuse to rent or sell housing;
- refuse to negotiate for housing;
- make housing unavailable;
- deny a dwelling;
- set different terms, conditions or privileges for sale or rental of a dwelling;
- provide different housing services or facilities;
- falsely deny that housing is available for inspection, sale or rental;
- for profit, persuade owners to sell or rent (blockbusting);
- deny anyone access to or membership in a facility or service (such as multiple listing service) related to the sale or rental of housing;
- refuse to allow reasonable modifications to dwelling or common use areas, at the expense of the renter or owner, if necessary, for the disabled person to use the housing; and
- refuse to make reasonable accommodations in rules, policies, practices or services if necessary, for the disabled person to use the housing.

In Mortgage Lending: No one may take any of the following actions based on these protected classes:

- refuse to make a mortgage loan;
- refuse to provide information regarding loans;
- impose different terms or conditions on a loan, such as different interest rates, points or fees;
- discriminate in appraising property;
- refuse to purchase a loan;
- set different terms or conditions for purchasing a loan.

In addition, it is illegal for anyone to:

- threaten, coerce, intimidate, or interfere with anyone exercising a fair housing right or assisting others who exercise that right;
- advertise or make any statement that indicates a limitation or preference based on race, color, national origin, religion, sex, familial status, or handicap. This prohibition against discriminatory advertising applies to single-family and owner-occupied housing that is otherwise exempt from the Fair Housing Act.

Section 504 of the Rehabilitation Act of 1973: Prohibits discrimination based on disability in any program or activity receiving federal financial assistance.

Section 109 of Title I of the Housing and Community Development Act of 1974: Prohibits discrimination on the basis of race, color, national origin, sex, or religion in programs and activities receiving financial assistance from HUD's Community Development Block Grant Program. Sections 104(b) and 106(d)(5) specifically require CDBG Program grantees to certify they will affirmatively further fair housing. This requirement was also included in Section 105(c)(13) of the National Affordable Housing Act of 1990.

Title II of the Americans with Disabilities Act of 1990: Prohibits discrimination based on disability in programs, services, and activities provided or made available by public entities. HUD enforces Title II when it relates to state and local public housing, housing assistance and housing referrals.

Architectural Barriers Act of 1968: Requires that buildings and facilities designed, constructed, altered, or leased with certain federal funds after September 1969 must be accessible to, and useable by handicapped persons.

Age Discrimination Act of 1975: Prohibits discrimination on the basis of age in programs or activities receiving federal financial assistance.

Equal Credit Opportunity Act of 1974: Prohibits discrimination in lending based on race, color, religion, national origin, sex, marital status, age, receipt of public assistance, or the exercise of any right under the Consumer Credit Protection Act.

Community Reinvestment Act (CRA) of 1977: According to the Federal Office of the Comptroller of the Currency, the CRA provides a framework for financial institutions, state and local governments, and community organizations to jointly promote banking services to all members of a community. The CRA:

- prohibits redlining (denying or increasing the cost of banking to residents of racially defined neighborhoods);
- encourages efforts to meet the credit needs of all community members, including residents of low- and moderate-income neighborhoods.

The CRA provides that “regulated financial institutions have continuing and affirmative obligations to help meet the credit needs of the local communities in which they are chartered.” CRA establishes federal regulatory procedures for monitoring the level of lending, investments and services in low- and moderate-income neighborhoods defined as underserved by lending institutions. CRA creates an obligation for depository institutions to serve the entire community from which its deposits are garnered, including low- and moderate-income neighborhoods.

Home Mortgage Disclosure Act (HMDA) of 1975: Requires banks, savings and loan associations, and other financial institutions to publicly report detailed data on their home lending activity. Under HMDA, lenders are required to publicly disclose the number of loan applications by census tract, income, race and gender of the borrower, the type of loan, and the number and dollar amount of loans made. Starting in 1993, independent mortgage companies were also required to report HMDA data. HMDA creates a significant and publicly available tool by which mortgage-lending activity in communities can be assessed. HMDA data can be analyzed to determine bank performance and borrower choices.

Executive Order 11063: Prohibits discrimination in the sale, leasing, rental, or other disposition of properties and facilities owned or operated by the federal government or provided with federal funds.

Executive Order 12892 (as amended): Requires federal agencies to affirmatively further fair housing in their programs and activities and provides that the Secretary of HUD will be responsible for coordinating the effort. The Order also establishes the President’s Fair Housing Council, chaired by the Secretary of HUD.

Executive Order 12898: Requires each federal agency conduct its program, policies, and activities that substantially affect human health or the environment in a manner that does not exclude persons based on race, color, or national origin.

Executive Order 13166: Eliminates, to the extent possible, limited English proficiency as a barrier to full and meaningful participation by beneficiaries in all federally assisted and federally conducted programs and activities.

Executive Order 13217: Requires federal agencies to evaluate their policies and programs to determine if any can be revised or modified to improve the availability of community-based living arrangements for persons with disabilities.

Review of State and Local Statutes, Policies and Plans

Typical impediments to fair housing choice were grouped into six areas for review. Existing state statutes, federal and state program rules and plans, local policies and practices and private sector regulations were evaluated to determine if they adequately addressed these current/potential impediments to fair housing choice. The potential impediments included in this list do not necessarily indicate a presence in Osceola County and/or Kissimmee, they are just common examples of impediments that stem from the enforcement of public policy on housing choice.

1. *State and local policies and actions affecting the approval of sites and other building requirements used in the approval process for the construction of public and private housing, including equalization of municipal services and state tax policy.*

Examples of current/potential impediments include:

- **Private Housing** – 1) inadequate supply of affordable housing stock for people from all protected classes and income levels, 2) inadequate access to employment opportunities, transportation and public and social services infrastructure to support increased housing opportunities for people from all protected class and income levels, and (3) community resistance to development of multi-family rental housing for lower-income households.
 - **State Tax Policy** – inadequate supply of affordable housing stock for persons with very-low and low-income levels.
2. *State and local policies concerning community development, such as displacement decisions pertaining to the removal of slums and blight, the sale or demolition of subsidized housing, and housing activities, such as multi-family rehabilitation and new construction sites and standards, and accessibility standards for new construction and alterations.*

Examples of current/potential impediments include:

- **Removal of slums and blight, sale or demolition of subsidized housing** – 1) displacement due to removal of dilapidated housing dwellings and 2) inadequate supply of subsidized housing stock.
 - **Multi-family rehabilitation and new construction sites and standards and accessibility standards for new construction and alterations** – 1) inadequate supply of affordable housing stock available for persons with disabilities, 2) local development standards and their implementation (e.g., zoning, building, or design standards), 3) additional fees for accommodations or modifications required for persons with disabilities, 4) inadequate access to employment opportunities, transportation, public and social services, and infrastructure to support increased housing opportunities for households for persons with disabilities.
3. *Public policies that encourage interdepartmental coordination between state and local agencies in providing housing and community development resources to areas of minority concentration, including persons with disabilities.*

Examples of current/potential impediments include:

- **Without public policies that encourage interdepartmental coordination between state and local agencies, the following impediments to fair housing choice could occur** – 1) failing to maximize the use of available funding and other housing and community development resources in areas of minority concentration and persons with disabilities and 2) lack of coordinated dissemination of information regarding the availability of funding and eligible activities from all HUD funded grant programs.
4. *Policies and practices affecting the representation of all racial, ethnic, religious and disabled segments of the community on fair housing advisory boards, commissions and committees.*

Examples of current/potential impediments include:

- The lack of adequate representation for all racial, ethnic, religious and disabled segments of the community on statewide fair housing advisory boards, commissions and committees.
5. *State and local policies concerning zoning and land use controls to overcome impediments to fair housing choice.*

Examples of current/potential impediments include:

- 1) Inadequate supply of affordable housing stock for lower-income, minority or persons with disabilities households in non-concentrated areas of a community, 2) community resistance to development of multi-family rental housing for lower-income, minority and persons with disabilities households, and 3) unintentional effects of local land use regulations and public policies or the result of implementation antiquated land use regulations, such as exclusionary zoning, large lot subdivisions, low density zoning, costly building requirements and materials that can exclude low- to moderate-income households that often include members of the protected classes, group homes, mobile homes, homeless shelters, and densities to allow multi-family development.
6. *Banking and insurance laws and regulations pertaining to the financing/refinancing, sale, purchase, rehabilitation and rental of housing that may affect the achievement of fair housing choice within the state.*

Examples of current/potential impediments include:

- 1) Discrimination in housing sales and rental for lower-income and minority individuals and persons with disabilities, 2) high loan denial rates and issuance of predatory-style loans, particularly for selected racial and ethnic minorities, and 3) discriminatory terms and conditions in rental markets, as well as steering in rental and home purchase markets.

Protected Classes and Discriminatory Practices

Both federal and Florida fair housing laws establish protected classes and make it unlawful to discriminate in the purchase and rental of housing. The Fair Housing Act (federal) and the Florida Fair Housing Act (Chapter 760 Part II, F.S.) deems it unlawful to “refuse to sell or rent after the making of a bona fide offer, or to refuse to negotiate for the sale or rental of, or otherwise make unavailable or deny, a dwelling to any person” because of:

- race;
- color;
- religion;
- national origin;
- sex;
- familial status (families with children under eighteen or who are expecting or adopting a child); and

- disability (includes physical, mental and developmental disabilities).

Federal laws, state statutes and case law further define discriminatory practices or acts in housing. The most common discriminatory housing practices fall under the following broadly defined categories:

- different terms and conditions;
- refusal to rent, sell or provide home loans;
- false denial of availability;
- intimidation and coercion;
- interference with rights;
- brokers' services;
- financing;
- advertising or discriminatory statements;
- new construction accessibility for persons with a disability;
- reasonable modification for persons with a disability;
- reasonable accommodation for persons with a disability.

Current housing discrimination patterns, where they exist, are less direct and overt. More subtle forms of differential treatment include steering to certain neighborhoods, housing developments or housing loan lending institutions. Disproportionate screening of applicants and access to unconventional types of mortgages are other types of discrimination used by housing loan-lending institutions. The difficulties of detecting these types of discrimination make it hard for fair housing agencies to identify them as impediments and create remedies to prevent them. In most cases, even when housing discrimination is suspected, victims are reluctant to report them or do not have the time or resources to do so.

Income differences could lead to areas of minority concentrations. Observed areas of minority concentration could be due to differences in the ability to afford housing in more affluent neighborhoods. Income is the most common factor when determining areas of minority concentrations in a neighborhood or community. Self-selection is also a factor that could lead to racial and ethnic concentrations in a neighborhood. This is most commonly observed in immigrant populations, where culture and language influence housing choice.

In some cases, local governments may have unintentionally implemented practices leading to minority concentrations and undermined fair housing and equal housing opportunity. The placement of subsidized housing projects has historically reinforced housing location. Persons who are most dependent on government assistance are

often housed in economically disadvantaged neighborhoods. Even with the element of housing choice for low-income residents, geographic constraints are present due to voucher and certificate limits and voluntary landlord participation.

Monitoring by Funding Program

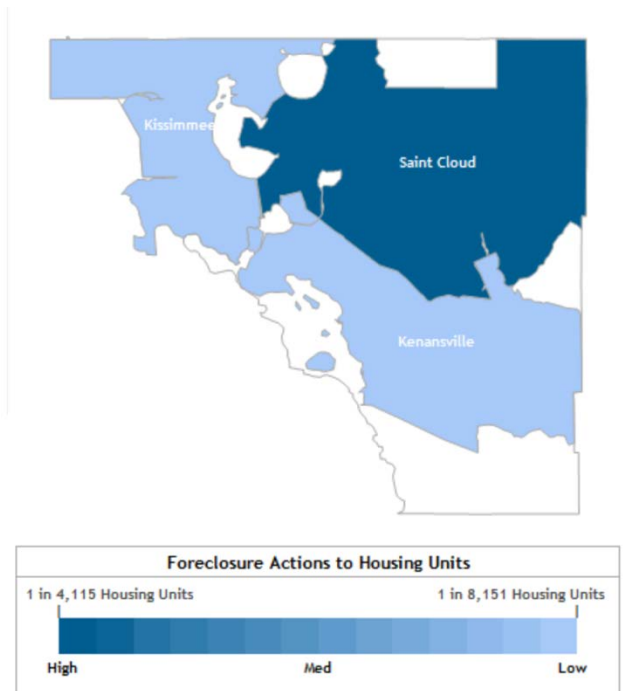
Community Development Block Grant (CDBG), HOME Investment Partnership Programs and Emergency Solutions Grant (ESG) Programs: Both Osceola County and the City of Kissimmee employ a monitoring program for all projects and activities funded by the CDBG, HOME and ESG Programs to ensure that all Program beneficiaries are receiving the necessary services, free from discrimination or unfair treatment, especially related to housing activities. Specific performance agreements will be executed with each sub-recipient, giving measurable objectives for the eligible activity to be completed and to ensure that the Federal requirements are clearly stated and the sub-recipient understands all responsibilities. Each project will receive annual monitoring and periodic monitoring during the course of the program year. All funding will be on a cost reimbursement basis. Documentation submitted with reimbursement requests will be reviewed for compliance with applicable regulations and measurable objectives prior to issuing of funds. Initial training will be provided prior to project commencement. On-site monitoring of selected sub-recipients will be scheduled and completed annually by the Project Manager. A checklist will be completed and reviewed to ensure all aspects of the activity are carried out in accordance with applicable regulations. A follow-up letter will be sent to the sub-recipient stating the outcome of the monitoring visit. In addition, any sub-recipient determined to need additional training on how to meet grantee and federal requirements will receive technical assistance, in the form deemed most appropriate to the circumstances, by the Project Manager. Additional technical assistance, if needed or requested, will be given at the time of the annual monitoring.

All HOME-funded projects that are still covered by the period of affordability will be inspected as required to ensure that the unit is still in standard condition and that the improvements completed are still in good condition. By this action, the County ensures that the housing units are maintained to the housing codes in effect when they were constructed or rehabilitated. Tenant files are reviewed to determine that income certifications are done correctly and that the appropriate rent is being charged.

Chapter 4 – Private Sector Conditions Impacting Fair Housing Choice

Foreclosure Trends and Impacts

In order to evaluate how current private sector conditions are impacting fair housing today, we must first compare trends from years prior, as well as other economic conditions currently impacting the housing markets in Osceola County and Kissimmee. According to the *Orlando Regional Relator's Association* Report, at the end of Quarter 2 in 2019 (April 1, 2019- June 30, 2019) there were 387 housing units, out of an estimated 162,661, in Osceola County undergoing some level of foreclosure (default, bank-owned, auction). Flash forward to end of Quarter 2 in 2020 (April 1, 2020 – June 30, 2020) where *RealtyTrac* is estimating that an average of 23 homes are entering the pre-foreclosure stages each month in Osceola County. This is large in part due to the ongoing health and economic impacts of the COVID-19 pandemic. *Source: RealtyTrac end of quarter report, June 30, 2020.*



This is large in part due to the ongoing health and economic impacts of the COVID-19 pandemic. The *Florida Department of Economic Opportunity (FDEO) Local Area Unemployment Statistics (LAUS) program* reported that in February 2020 the unemployment rate in the Orlando-Kissimmee-Sanford Metropolitan Statistical Area (MSA), which includes all of Kissimmee and Osceola County, was 2.9 percent. In May 2020, *FDEO LAUS program* reported a staggering increase to 21.1 percent and in June 2020 we saw a slight decrease to 16.5 percent, with the State of Florida lifting stay-at-home orders and entering Phase 2 of re-opening. Osceola County and Kissimmee's local economies rely heavily on tourism and entertainment industry jobs, so the uncertainty of how the ongoing health crisis will ultimately affect the local housing market and private sector conditions by the end of 2020 remains to be seen.

Financing Patterns and Availability of Affordable Housing

While unemployment rates continue to rise and fall due to the COVID-19 pandemic, mortgage and housing interest rates are steadily decreasing which creates a positive trend for homebuyers and increasing strength in demand. As of July 31, 2020, *Freddie Mac* reported that the current 30-year mortgage rate had fallen to an all-time low of 2.88 percent, which marks a 72 percent decrease from July 31, 2019. However, the main barrier to furthering fair and affordable housing remains, lack of availability.

According to 2019 Census Bureau data, there are an estimated 162,661 housing units in Osceola County, with approximately 20,769 being located in the city limits of Kissimmee. The estimated population in Osceola County is 375,751 as of July 1, 2019, with 72,717 of people residing within the city limits of Kissimmee. An estimated 24 percent of that population is 18 years or younger, which leaves approximately 123,623 persons over the age of 18 years that need access to housing. At first glance, it appears that the numbers are capable with the need and demand. However, we must also consider affordability to ensure that every resident has equal access to affordable housing. The average sales prices of homes in Osceola County range from \$205,000 to \$275,000 and \$215,000 to \$279,000 in Kissimmee. The estimated Median Household Income (MHI) in Osceola County is \$50,063 and \$39,841 in Kissimmee. In order to avoid cost burden, a household must spend equal to or less than 30 percent of their monthly income on housing costs. With increasing home prices and economic uncertainty due to the current conditions in this region of Florida, the lack of availability of affordable housing is a potential impediment to fair housing that simply cannot be ignored.

Other Types of Private Sector Conditions Impacting Fair Housing

In July 2020, Osceola County and the City of Kissimmee completed their *2020-2025 Consolidated Plans* that included some common types of private sector conditions that directly affect fair housing choice and barriers to the accessibility of affordable housing. These **private sector barriers** include:

- Lending
- Loan Servicing
- Credit
- Insurance
- Real Estate Industry
- Rental Housing

In 2008, we saw the worst Nation-wide housing crisis since The Great Depression. The housing crisis was predominantly caused by predatory lending and loan services that supplied subprime mortgages and charged fees that made a once affordable house, unaffordable. This led to unprecedented number of foreclosures and abandoned properties in our communities. These predatory lending practices are still present in our society and in the Central Florida region, so in order to determine whether they are still an impediment to fair housing choice, we consulted with Community Legal Services of Mid-Florida (Kissimmee Office) to evaluate the local trends and the impact they have on our citizens.

Regardless of the Federal and State laws that prohibit predatory lending practices, the following table lists the of the different types of predatory lending practices that still exist in our communities and the estimated number of cases assessed.

Table 4-1 Predatory Lending Practices in Osceola County, 2019	
Predatory Lending Practice	# of Cases Assessed
Adjustable Interest Rates	4
Credit Requirements	11
Services Fees	9
Rent-to-Own Scams	2
Rescue Scams	7

Source: Community Legal Services of Mid-Florida (Kissimmee Office)

Although the number of cases assessed is relatively low, these cases show that these trends and practices still exist and will be considered when determining resolutions to address these impediments over the next five-year period.

Chapter 5 – FAIR HOUSING COMPLAINTS

Complaints by Agency

The Osceola County HOME Consortium consulted with Community Legal Services of Mid-Florida (Kissimmee Office) to analyze current, localized data to accurately reflect and evaluate the number and type of fair housing complaints that are filed in Osceola County and Kissimmee, over a one-year period. In order to accurately reflect the comparisons by calendar year, the one-year period was extended to reflect data between January 2019 – August 2020. The following *Table 5-1 Fair Housing Complaints by Agency*, reflects the information received and analyzed.

Table 5-1 Fair Housing Complaints by Agency		
Agency: Community Legal Services of Mid-Florida (Kissimmee Office)	Osceola County	Kissimmee
Average number of Fair Housing Complaints received annually:	42	31
Number of current open Fair Housing Complaints cases:	8	6
Estimated number of Fair Housing Complaints received annually due to Discrimination:	21	13
Estimated number of Fair Housing Complaints received annually due to reasons other than Discrimination:	21	18
Number of closed Fair Housing Complaint cases in 2020:	4	3
Number of closed Fair Housing Complaint cases in 2019-2020:	34	25

As indicated above, between January 2019 and August of 2020, the average number of fair housing complaints for Osceola County is 42 and 31 for Kissimmee. These numbers include all phone inquiries received, some of which are determined to be inaccurate and do not become legal cases. Furthermore, we wanted to gather some general information on the types of complaints received. It is commonly perceived that the most frequent type of fair housing complaint is based on discrimination. However, the data reflects that complaints due to “reasons other than discrimination” are just as common as those for discrimination. Fair housing complaints due to “reasons other than discrimination,” include: predatory lending, unreasonable credit requirements, and/or miscellaneous fees on mortgages or rental rates.

In addition to the data referenced above, the consultation efforts also included questions regarding how fair housing complaint reporting has been affected by the COVID-19 pandemic.

Complaint Resolutions by Agency

According to *Table 5-1* above, between January 2019 and December 2019, there were 34 fair housing complaint cases closed in Osceola County and 25 cases closed in Kissimmee. Those numbers are considerably higher than the number of cases closed in 2020. As of August 2020, there have only been 4 fair housing complaint cases resolved and closed in Osceola County and only 3 in Kissimmee. This data reflects a decrease in reporting, possibly due to the impacts of State mandated moratoriums on evictions or mortgage/rental assistance programs available through the CARES Act legislation. As the pandemic continues to affect the overall housing market in Osceola County and Kissimmee, consultation efforts and collaboration with Community Legal Services of Mid-Florida will continue past the publishing of this *AI Plan* to analyze and capture the true effects and challenges that the new economic landscape can have on fair housing choice and complaint reporting.

Presence and Role of Fair Housing Education and Enforcement

Both Osceola County and the City of Kissimmee implement fair housing practices internally through their Human Services and Development Services Departments, in partnership with Community Legal Services of Mid-Florida. These fair housing practices include both public education and enforcement procedures and are required for all Federal, State and Local funded housing projects. Fair housing workshops and summits are conducted periodically to encourage public attendance and participation. In order to ensure efficiency, complaint reporting and other enforcement procedures are managed by Community Legal Services of Mid-Florida. All sub-recipients and developer partners are held to the same standards and procedures for furthering fair housing within our communities. Any contracts or development agreements for housing projects funded with HUD program funding clearly demonstrate the required laws and principles for fair housing choice enforcement.

In November 2018, Osceola County held a Fair Housing and Community Development Summit to celebrate the 50th anniversary of the Fair Housing Act. During the next five-year period, Osceola County and the City of Kissimmee anticipate the planning and implementation of at least two (2) public fair housing workshops to increase awareness and further fair housing choice for its residents and citizens. Due to the COVID-19 pandemic, planning procedures will now include safety protocols for all attendees and staff. The fair housing workshops will be widely advertised through the use of the County and City websites, social media and other media outlets in accordance with Federal, State and Local laws.

Chapter 6 – IMPEDIMENTS TO FAIR HOUSING CHOICE IDENTIFIED AND SUGGESTED RESOLUTIONS

Based on the results from the consultation and analysis for this AI Plan, as well as the findings from the 2020-2025 Consolidated Planning process, the Osceola County HOME Consortium has identified six (6) private sector impediments that exist within the Osceola County and Kissimmee communities. The impediments identified have resulted from private sector housing trends, rather than local public policy that would negatively impact fair housing choice. Therefore, the Osceola County HOME Consortium is suggesting recommendations to address these impediments over the next five-year period.

Impediment #1: Discrimination in Housing Sales and Rental

Recommendations for resolution:

1.1 Encourage subgrantees to target marketing resources to promote fair housing awareness in underserved communities. Examples include targeted TV stations, radio, and print media.

1.2 Require local HOME and CDBG grantees to publish a public notice in the local newspaper providing the contact information and the availability of local fair housing counseling services and post this notice in the local administration building and on the community's website.

Impediment #2: Lack of Existing/Available Housing Stock and the Geographic Distribution of Affordable Housing Stock

Recommendations for resolution:

2.1 Continue to develop various incentive programs that reduce the cost of development of new affordable housing.

2.2 Allow affordable accessory residential units in residential zoning districts.

2.3 Support development near transportation hubs and major employment centers and mixed-use developments.

Impediment #3: Community Resistance to development of multi-family rental housing and housing for lower-income or minority households

Recommendations for resolution:

3.1 Continue the review of local comprehensive land use plans and amendments to ensure they do not include impediments to fair housing choice and affirmatively further fair housing.

3.2 Allow flexible densities for affordable housing.

3.3 Allow flexible lot configurations, including zero-lot-line configurations for affordable housing.

Impediment #4: Inadequate access for minority households to housing outside of areas minority concentration

Recommendations for resolution:

4.1 Assign application rating points to increase competitiveness to HOME projects not located in areas of minority concentration.

4.2 Coordinate with housing developers and local housing and supportive service providers on best practices related to utilization rates and locating projects outside areas of minority concentration.

Impediment #5: Inadequate access to employment opportunities, transportation and public and social services infrastructure to support increased housing opportunities for lower income, minority, and disabled households.

Recommendations for resolution:

5.1 Continue to review local comprehensive land use plans and amendments to ensure all residents have adequate transportation access to jobs and to public and social services

5.2 Reserve infrastructure capacity for housing for very-low income persons, low-income persons, and moderate-income persons.

5.3 Encourage multi-modal forms of transportation and proximity of mass transit.

Impediment #6: High loan denial rates and issuance of predatory-style loans, particularly for selected racial and ethnic minorities

Recommendations for resolution:

5.1 Enhance understanding of real estate transactions, the attributes of predatory style loans and how to establish and keep good credit, particularly for first-time homebuyers, through courses and seminars.

5.2 Provide subrecipients with resource materials and encourage them to conduct outreach and education to the banking industry, including organizations that provide homebuyer training.

Chapter 7 – Public Comment and Conclusion

Public Comment

During the development of this 2020-2025 Analysis of Impediments to Fair Housing Choice Plan, the Nation was impacted by the COVID-19 pandemic, limiting the County and City's abilities to hold in-person public meetings to solicit input from the general public. An online survey was produced in February 2020, but there were no responses received. In December 2019, the Osceola County Human Services Department held a joint public meeting with the City of Kissimmee Development Services Department to solicit public input on both the 2020-2025 HOME Consortium Consolidated Plan and the 2020-2025 Analysis of Impediments to Fair Housing Choice. The only comment related housing issues was that recent housing development was increasing traffic flow issues.

In February 2020, the City of Kissimmee held a public meeting to collect public input on the 2020-2025 Consolidated Plan and 2020-2025 Analysis of Impediments to Fair Housing Choice. There were no comments received on fair housing related issues.

In July 2020, Osceola County held two (2) virtual meetings via the Zoom online platform to discuss the findings of the 2020-2025 Analysis of Impediments to Fair Housing Choice, but there was no public attendance at either meeting.

Due to the lack of public participation the Osceola County HOME Consortium elected to finalize the *AI* process in August 2020. The final *AI* Plan will be published to both the Osceola County and City of Kissimmee websites on or around August 15, 2020 for public review.

Conclusion

After conclusion of the 2020-2025 Analysis of Impediments to Fair Housing Choice (*AI*) process, the following findings were determined:

- The six (6) impediments to fair housing choice affecting Osceola County and City of Kissimmee residents discussed in this report are:
 - Discrimination in housing sales and rental;
 - Lack of existing/available housing stock and the geographic distribution of affordable housing stock;
 - Community resistance to development of multi-family rental housing and housing for lower income or minority households;
 - Inadequate access for minority households to housing outside areas of minority concentration;
 - Inadequate access to employment opportunities, transportation and public and social services infrastructure to support increased housing

- opportunities for lower income, minority, and disabled households;
and,
 - High loan denial rates and issuance of predatory-style loans, particularly for selected racial and ethnic minorities.;
- These impediments are predominantly private sector barriers relating to the sale and rental of housing;
- Proposed resolutions to the impediments will be considered during periodic Affordable Housing Advisory Committee or Board meetings;
- Osceola County and City of Kissimmee will continue to utilize HUD funding to address affordable housing issues over the next five-year period; and
- This AI Plan will be updated again during the 2025-2030 Consolidated Plan process, if not sooner should it be deemed necessary due to major changes in the housing markets in Osceola County and the City of Kissimmee.

- opportunities for lower income, minority, and disabled households;
and,
- High loan denial rates and issuance of predatory-style loans, particularly for selected racial and ethnic minorities.;
- These impediments are predominantly private sector barriers relating to the sale and rental of housing;
 - Proposed resolutions to the impediments will be considered during periodic Affordable Housing Advisory Committee or Board meetings;
 - Osceola County and City of Kissimmee will continue to utilize HUD funding to address affordable housing issues over the next five-year period; and
 - This AI Plan will be updated again during the 2025-2030 Consolidated Plan process, if not sooner should it be deemed necessary due to major changes in the housing markets in Osceola County and the City of Kissimmee.

