



2025 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE



FINANCE DEPARTMENT
Grants Administration

175 E. 2nd St., Tulsa, OK 74103
www.cityoftulsa.org/grants



HAS YOUR RIGHT TO FAIR HOUSING BEEN VIOLATED?

If you feel you have experienced discrimination in the housing industry, please contact:

Office of Fair Housing and Equal Opportunity
U.S. Department of Housing and Urban Development
451 Seventh Street SW, Room 5204
Washington, DC 20410-2000
Telephone: (202) 708-1112
Toll Free: (800) 669-9777
Website: <http://www.HUD.gov/offices/fheo/online-complaint.cfm>

Oklahoma Attorney General's Office
Office of Civil Rights Enforcement
15 W. 6th Street, Suite 1000
Tulsa, Okla. 74119
Office: (918) 581-2342
Fax: (918) 938-6348
Email: ocre.complaints@oag.ok.gov
Website: <http://www.oag.ok.gov/civil-rights-enforcement-unit>
Complaint Forms: <http://oag.publishpath.com/Default.aspx?shortcut=civil-rights-enforcement-complaint-forms>

City of Tulsa – Department of Resilience and Equity
City Hall
175 East 2nd Street 14th Floor
Tulsa, Oklahoma 74103
Office: (918) 596-7411
Email: Resilient@cityoftulsa.org

Metropolitan Fair Housing Council of Oklahoma, Inc.
312 Northeast 28th Street, Suite 112
Oklahoma City, OK 73105
Toll Free: 1-866-677-7541
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Legal Aid Services, Tulsa Law Office
907 South Detroit Avenue, Suite 725
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SECTION I. INTRODUCTION

This Analysis of Impediments helps to meet the City of Tulsa's obligation to affirmatively further fair housing, which is a requirement of recipients of funding from the US Department of Housing and Urban Development (HUD). HUD suggests that an analysis of impediments be conducted every five years, preferably in conjunction with a five-year Consolidated Plan process.

This Analysis of Impediments (AI) to Fair Housing Choice provides an overview of laws, regulations, conditions, and other possible obstacles that may affect an individual's or household's access to housing.

- A comprehensive review of laws, regulations, and administrative policies, procedures, and practices, and an assessment of how they affect the location, availability, and accessibility of housing; and
- An assessment of conditions, both public and private, affecting fair housing choice.

The City completed its previous AI in 2019 with a set of action steps it planned to carry out over the next five years. It should be noted that the City's ability to carry out those action steps were impacted by the global COVID-19 pandemic, which was first diagnosed in the United States in January 2020. During this time, states of emergency were declared and the federal and state governments enacted safety measures such as shutting down large gathering places and limiting the movement of residents. These restrictions remained in place in varying degrees over the years following the initial outbreaking the United States and resulted in significant impacts on the economy, particularly on the housing market and socio-economic indicators. These impacts are still seen today as discussed throughout this plan.

Definitions

Below are terms frequently used throughout this report:

Affirmatively Further Fair Housing means taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing means addressing significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially or ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws. See 24 CFR § 5.151

Protected Characteristics are defined at the Federal and State levels and are discussed in Section IV of this report.

Racially/Ethnically Concentrated Area of Poverty (R/ECAP) is a neighborhood (census tract) that has a poverty rate of 40 percent or more and a racial or ethnic concentration where 50 percent or more of the tract is composed of minority residents.

Background on AI Requirements

For decades, HUD has required participants of HUD programs, such as states, local governments, insular areas, and public housing authorities (PHAs), to engage in Fair Housing Planning. Such planning has previously consisted of the Analysis of Impediments to Fair Housing Choice (AI) and the Assessment of Fair Housing (AFH) and was done in connection with other types of planning required by program requirements, such as the consolidated plan, annual action plan, and PHA plan.

On February 9, 2023, HUD published in the Federal Register a Notice of Proposed Rulemaking (NPRM) entitled “Affirmatively Furthering Fair Housing.” Comments on the rule were accepted through April 2023, however, that rule was withdrawn in January 2025. In the absence of a new rule, HUD’s 2021 Interim Final Rule (IFR) remains in effect until further notice.

HUD’s 2021 Interim Final Rule, “Restoring Affirmatively Furthering Fair Housing Definitions and Certifications,” requires program participants to submit certifications that they will affirmatively further fair housing in connection with their consolidated plans, annual action plans, and PHA plans. In order to support these certifications, the IFR creates a voluntary fair housing planning process for which HUD will provide technical assistance and support.

The IFR also rescinded the 2020 Preserving Communities and Neighborhood Choice rule, which caused program participants to certify “compliance” with a regulatory definition that is not a reasonable construction of the Fair Housing Act’s mandate to affirmatively further fair housing. With the IFR, HUD put itself and its program participants back in a position to take meaningful steps towards improved fair housing outcomes. The IFR does not require program participants to undertake any specific type of fair housing planning to support their certifications.

HUD implements the AFFH mandate in other ways, such as through its collection of certifications from program participants, provisions regarding program design in its notices of funding opportunity (NOFOs), affirmative fair housing marketing and advertising requirements, and enforcement of site and neighborhood standards.

On March 3, 2025, HUD issued an interim final rule to repeal the 2021 interim final rule, including any parts of a previous 2015 AFFH Rule incorporated therein, and the 1994 requirement to produce an analysis of impediments to fair housing where such requirements appear in regulation or guidance. Thus, if implemented, this interim rule returns to the original understanding of what the statutory AFFH certification was prior to 1994, a general commitment that grantees will take active steps to promote fair housing. Grantee AFFH certifications will be deemed sufficient provided they took any action during the relevant period rationally related to promoting fair housing, such as helping to eliminate housing discrimination. This interim final rule does not reinstate the obligation to conduct an analysis of impediments or mandate any specific fair housing planning mechanism; program participants must continue to affirmatively further fair housing as and to the extent required by the Fair Housing Act. Final comments on the interim rule were due by May 2, 2025.

Understanding Fair Housing and Impediments to Fair Housing

In light of the various pieces of fair housing legislation passed at the Federal and State levels, fair housing throughout this report incorporates the concept of fair housing choice and means:

A condition in which individuals of similar income levels in the same housing market have a range of choices available to them regardless of their characteristics as protected under State and Federal laws.

HUD's Office of Fair Housing and Equal Opportunity (FHEO) draws a distinction between housing affordability and fair housing. Economic factors that affect a household's housing choices are not fair housing issues per se. Only when the relationship between household income, household type, race/ethnicity, and other factors create misconceptions, biases, and differential treatments is where fair housing concerns arise.

Tenant/landlord disputes are also typically not related to fair housing. Most disputes between tenants and landlords result from a lack of understanding by either or both parties on their rights and responsibilities. Tenant/landlord disputes and housing discrimination cross paths when the disputes are based on factors protected by fair housing laws and result in differential treatment.

Within the legal framework of Federal and State laws, and based on the guidance provided by HUD's Fair Housing Planning Guide, impediments to fair housing choice can be defined as:

- Any actions, omissions, or decisions taken because of the characteristics protected under State and Federal laws, which restrict housing choices or the availability of housing choices; or any actions, omissions or decisions which have the effect of restricting housing

choices or the availability of housing choices on the basis of characteristics protected under State and Federal laws.

- To affirmatively promote equal housing opportunity, a community must work to remove impediments to fair housing choice.

Methodology

The following steps were taken to update the report:

- Analyze current publicly available data regarding the demographics and housing;
- Engage with community members and stakeholders via public meetings and correspondence;
- Identify impediments to fair housing choice for residents; and
- Develop strategies and actions for removing impediments and affirmatively furthering fair housing choice.
- Analysis of demographic and housing trends was completed using data from numerous sources, including the US Census Bureau's 2000, 2010, and 2020 Decennial Census data, American Community Survey (ACS) 2018 – 2022 and 2023 data, Housing Mortgage Disclosure Act Data from 2023 and other sources identified throughout the plan. The most current data sources available at the time of drafting this report were used, however, gaps in collection, publication, and analysis of data from the primary sources have presented challenges in the current landscape of rapidly changing housing costs and inflation. These lags have resulted in differences between information presented in the data and the current experiences described in consultation with the community. Where possible, additional data sources are used to provide context of current challenges.

The community engagement process involved three stakeholder meetings and interviews as well as a digital survey. Engagement materials were distributed to service organizations who then distributed it to their served populations. Residents were highlighted for engagement, including: racial and ethnic minorities, people experiencing homelessness, people with disabilities, and people with limited English proficiency.

Stakeholders from a variety of organizations were contacted as well, including organizations that provide housing, housing services, homeless services, nonprofit social services, services for seniors, services for disabled persons, and HIV/AIDS services, as well as government agencies, advocates, emergency service providers, educational organizations, and economic development organizations.

The Community Engagement Process is further discussed in Section VIII.

Impediments to Fair Housing Choice and Planned Action

Impediments were identified through an analysis of the collected data and community engagement findings. Goals were then developed to address these impediments to create a cohesive strategy and leverage resources. The identified impediments and proposed actions follows are listed in Section X of this plan.

SECTION II. PAST IMPEDIMENTS

The City completed a previous AI in 2020 with a set of action steps it planned to carry out over the next five years. It should be noted that the City's ability to carry out those action steps were impacted by the global COVID-19 pandemic, which was first diagnosed in the United States in January 2020. During this time, states of emergency were declared and the federal and state governments enacted safety measures such as shutting down large gathering places and limiting the movement of residents. These restrictions remained in place in varying degrees over the years following the initial outbreak in the United States and resulted in significant impacts on the economy, particularly on the housing market and socio-economic indicators. These impacts are still seen today as discussed throughout this plan.

The following chart summarizes the impediments identified in the 2020 Analysis of Impediments and provides an update on actions taken.

PAST ACTION STEPS		OUTCOMES	
Action #1 Address Lack of Knowledge of Fair Housing			
Support fair housing training and education opportunities throughout the City, specifically for rental properties that will be directed to housing service providers, management companies, and rental residents.		Several opportunities are provided annually that address tenant rights and landlord responsibilities: <ul style="list-style-type: none">• The Health Department has fair housing trainings that result in a good mix of resident and landlord attendees.• City Life is a monthly publication that is included as a stuffer in the City of Tulsa utility bill sent out to all customers and has included educational information on tenant fair housing rights.	
Ensure training opportunities for rental residents include information on the Oklahoma Landlord Tenant Act to clearly inform this population on their rights and responsibilities. Ensure these trainings are offered in English and Spanish.		<ul style="list-style-type: none">• The City of Tulsa Compliance Officer is part of the Mayor’s Office of Resilience and Equity (MORE) and is charged with promoting enforcement and compliance of many federal, state, and local laws including fair housing laws. These are the laws put in place to ensure protection from discrimination for renters and homebuyers; this includes individuals with disabilities and those who live or are associated with them.	

	<p>Education opportunities are offered through MORE for Tulsa residents.</p> <ul style="list-style-type: none"> • Tulsa Area Fair Housing Committee supports fair housing training and education. The Commission holds events about fair housing one to two times a year. The events explain fair housing laws and tenant rights and provide resources to teach how to build advocacy skills. • Tulsa’s Equality Indicators assessing housing access for residents, and the City publishes annual reports on progress. Trainings are provided along with the annual publications so that residents better understand available resources.
<p>Action #2 Address Disproportionate Housing Problems and Economic Barriers</p>	
<p>Coordinate clearance and demolition efforts with homeowner rehabilitation and single-family housing development to improve neighborhoods that currently have a high percentage of vacant and abandoned properties.</p>	<ul style="list-style-type: none"> • Applicants for HUD funding are always encouraged to make the greatest impact by collaborating efforts in projects. Programmatically, CDBG funding for demolition can be paired with HOME-funded activities such as development. In the past five years, the Planning and Neighborhoods Department (previously Working in Neighborhoods) has run a clearance and demolition program. All structures cleared or demoed are extensively evaluated and inspected to meet the criteria of dilapidated and dangerous conditions. Property notices are posted and public hearings are conducted before a structure is cleared or demoed. As of Program Year 2023, 56% or 116/208 community needs for these services have occurred. Projected accomplishments for the full five-year consolidated plan would meet 74% of the strategic plan goal.

	<ul style="list-style-type: none"> • The Mayor's/Council's (3H Task Force) Path to Home Recommendations include the following goal: <ul style="list-style-type: none"> ○ <i>Vacant Lot Acquisition Program:</i> Implement a pilot program with PartnerTulsa to identify and acquire vacant lots prime for housing development where new construction is economically viable. The program will initially focus on smaller infill lots with the goal of addressing properties that are identified on the City's nuisance and/or demolition lists.
Give special consideration to rental housing development which includes at least 10% accessible units and single-family housing which includes universal design during the grant allocation process.	Grants Administration's HOME applications consider the number of ADA accessible units proposed in projects. All HOME-funded projects are reviewed for applicability and compliance with Section 504. Section 504 provides rights to persons with disabilities in HUD-funded programs and activities. Section 504 requires a minimum of 5%, or at least one unit, whichever is greater to be accessible for persons with mobility disabilities. An additional 2% of units, or at least one unit, whichever is greater, must be accessible for persons with hearing or visual disabilities.
Prioritize affordable housing development funding to non-profit developers in collaboration with the strategies included in Tulsa's Affordable Housing Strategy (https://www.cityoftulsa.org/media/11872/cot-affordable-housing-strategy-121119.pdf).	<p>HOME awards were limited to Non-Profit developers during PY20-PY24, as part of the Tulsa's Affordable Housing Strategy.</p> <p>HUD funding aligned with many of the Affordable Housing Strategy goals: https://www.cityoftulsa.org/media/11894/cot-affordable-housing-strategy-12-16-19.pdf</p>
Provide information, tools, and legal support to people who are at risk of eviction.	<ul style="list-style-type: none"> • During the height of the COVID-19 pandemic in 2021 when many renters were at risk of eviction, the City of Tulsa

	<p>launched its "Gold Star Landlord Program," a free and voluntary program that provided incentives and rewards to landlords who engaged in equitable rental practices including, but not limited to: participation in Tulsa Health Department's Safe and Healthy Homes program, listing all available rental units on the City of Tulsa's Affordable Housing Waitlist, and participation in Early Settlement Mediation before evicting tenants.</p> <ul style="list-style-type: none"> • The City of Tulsa received over \$21 million dollars in Emergency Rental Assistance (ERA) funds to assist low-income and pandemic-affected Tulsans with rent and utility payments. The City partnered with Restore Hope Ministries, a Tulsa nonprofit, to help keep eligible Tulsans in their homes. As of September 2024, 5,000 unique households have received over \$19 million dollars in rent, utility, and other housing costs assistance. • Tulsa Economic Development Corporation (TEDC), a nonprofit Community Development Financial Institution (CDFI), received \$500,000 from the City of Tulsa in American Rescue Plan Act (ARPA) funds to launch "Saving Our Homes Initiative", a new program that assists low-income homeowners in clearing clouded titles and paying delinquent property taxes. As of September 2024, TEDC has helped 68 low-income homeowners remain in their homes by providing over \$150,000 in direct payment assistance and provided financial education to over 120 participants.
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Provide expungement support for people with criminal records or prior evictions.	City of Tulsa's Municipal Courts hosts an annual "Clear Your Warrants" event wherein individuals can clear their warrants and pay any pending fines without fear of arrest. The event can also connect individuals facing financial burdens to the Financial Empowerment Center (FEC) that offers free one-on-one sessions with licensed financial counselors. Upon completion of three sessions, individuals are eligible to receive a waiver of \$250 in court fines and fees. Resources are available on the City website .
Provide homebuyer education using HUD approved counselors. Ensure training is available in Spanish and English.	Residents receiving downpayment assistance through the HOME program are required to attend HUD-approved homebuyer education. Habitat for Humanity offers homebuyer education courses.
Action #3 Address Lack of Access to Transportation Options Reducing Housing and Economic Opportunities	
The implementation of a Bus Rapid Transit (BRT) system, branded AERO BRT, will provide enhanced bus service in two key corridors of the city by reducing travel times and providing a high level of passenger amenities. These high-capacity transit lines will connect people to jobs and other major destinations in the City. The BRT system will operate 7 days a week every 15 minutes weekdays and 20-30 minutes on weekends. The first BRT route will run north and south along Peoria Avenue from 54th Street North to 81st Street South. The second corridor will run east and west from downtown along 11 th Street corridor out to 145 th East Ave. Housing development will be coordinated in these transportation corridors to complement efforts identified in the City's five-year affordable housing strategy.	<ul style="list-style-type: none"> This has been implemented and proven to be a tremendous success. The Aero (700) Peoria BRT carries one-third of MetroLink Tulsa's ridership and increased corridor usage by 60%. As of June 2024, MetroLink Tulsa was awarded a grant of approximately \$12 Million from the Rebuilding American Infrastructure with Sustainability and Equity (RAISE) program. This significant federal investment will enable the development of 44 new Bus Rapid Transit (BRT) stations along the historic Route 66 corridor, creating a transformative impact on our public transportation system. Modus, a Tulsa nonprofit, received \$90,952.55 from the City of Tulsa in American Rescue Plan Act (ARPA) funds to provide free transportation to essential services for individuals lacking reliable access to quality transportation. During their program year, Modus provided over 300 free rides to Tulsans attending vaccination and

	<p>doctor's appointments, job interviews, and other employment services.</p> <ul style="list-style-type: none"> • In 2017, the City of Tulsa and the Community Service Council (now led by the Tulsa Area United Way) created a longitudinal, data-based framework to identify inequalities, to measure their impact, and to track progress in reducing or eliminating them—the Tulsa Equality Indicators, which are tracked yearly. Indicators 52-54 focus on transportation: <ul style="list-style-type: none"> ○ <u>Indicator 52: Bus stop concentration by geography</u> ○ <u>Indicator 53: Commute time by mode of transportation</u> ○ <u>Indicator 54: Vehicle access by race</u>
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SECTION III: DEMOGRAPHIC AND HOUSING CHARACTERISHTICS

Population and Demographics

Population change in Tulsa City has increased at 5.84% since 2010, which is much lower increase compared to Tulsa County, Oklahoma and National. Fast population growth that is not accompanied by housing production can lead to an increase in housing costs that leave many people in substandard conditions, cost burdened, or at risk of homelessness. It is important to recognize these trends and attempt to address them before they cause any impediments to housing choice.

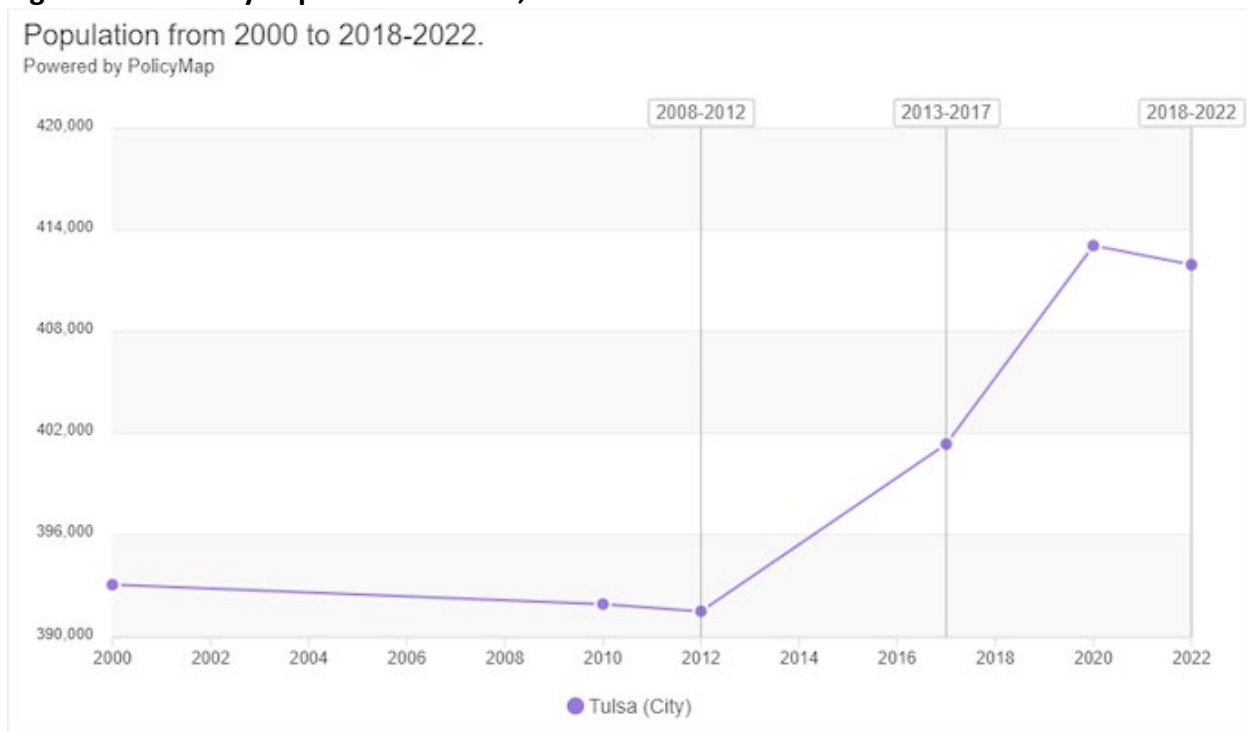
Population Growth

As shown in Table 1 below, Tulsa City population has been increasing only at 5.84% from 2010 to 2023. Since 2022, the population has decreased marginally by 0.25%. In comparison, Tulsa County has grown 15.79% from 2010 to 2023.

Table 1: Population Growth, 2010- 2023				
	2010	2020	2023	% Change from 2010 to 2023
United States	303,965,272.00	326,569,308.00	334,914,896.00	10.18%
Oklahoma	3,675,339.00	3,949,342.00	4,053,824.00	10.30%
Tulsa County	589,757.00	650,291.00	682,868.00	15.79%
Tulsa City	388,247.00	402,441.00	410,915.00	5.84%

Source: ACS 1-YR Estimates DP05

Figure 1: Tulsa City Population Growth, 2000- 2022

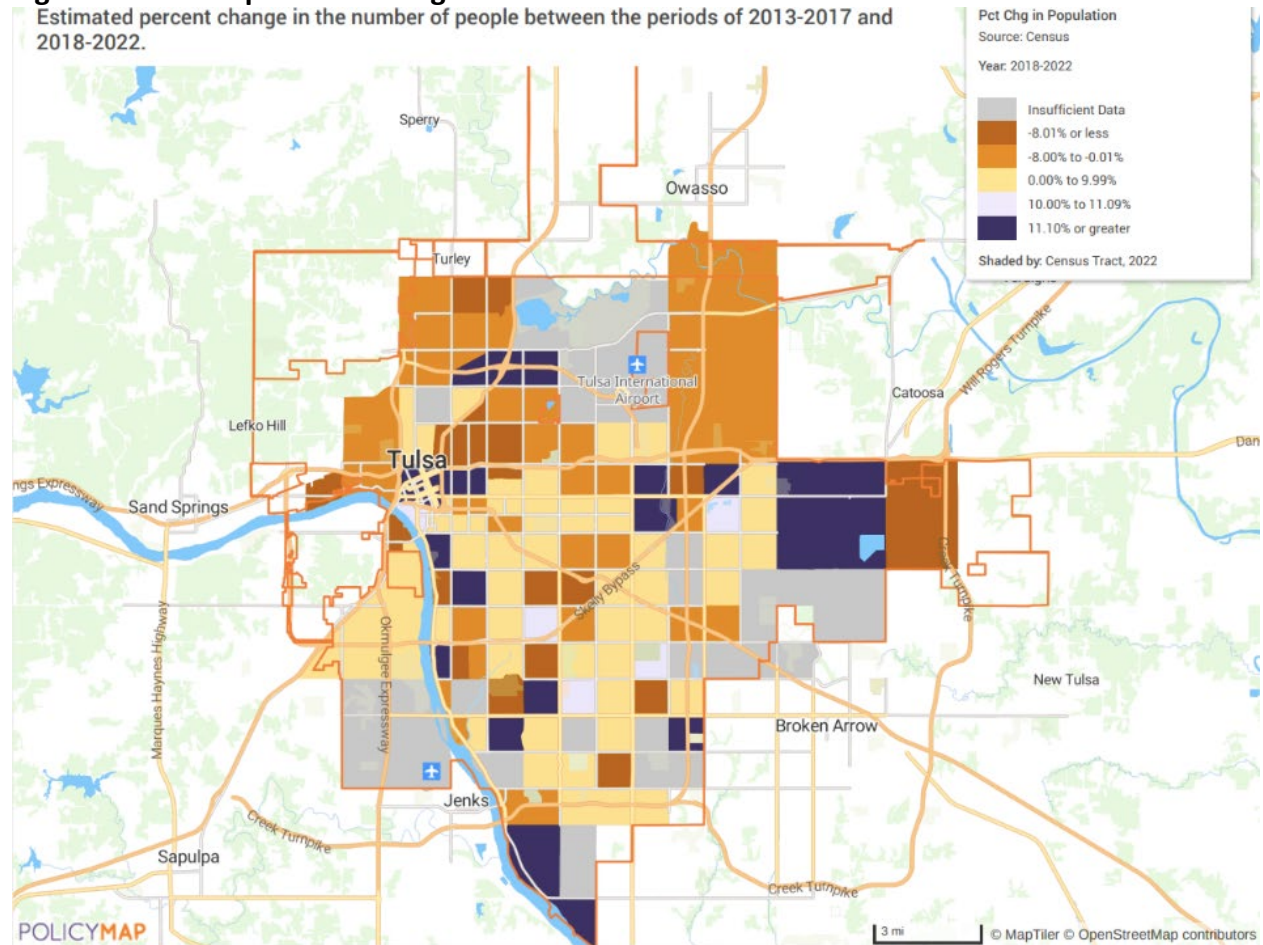


The change in the City's population between 2018 and 2022 was not uniform throughout the City. Figure 2 below shows that some tracts saw growth of at least 11%, typically in areas on the outer edges of the City. Other tracts saw a decrease of at least -8%, with higher concentrations being on the western side of the City.

Population Change

The map below illustrates population changes between the periods of 2013-2017 and 2018-2022 based on ACS data. As shown the greatest growth is along the edges of the City.

Figure 2: Tulsa Population Change Between 2013- 2017 and 2018- 2022



Source: 2018-2022 ACS via PolicyMap

Demographic Trends

The change in population is not the only trend that should be analyzed. The demographics of that population are also important. Community needs can vary significantly based on the age of the population, ethnicity, education, and other factors. There is no “one-size fits all” policy that will bring about the best results for all communities. It is necessary to tailor support to match particular needs.

Age

The median age of Tulsa City residents has gone up marginally from 2010 to 2023, as demonstrated by Table 2. The median age is lower than that of Tulsa County, Oklahoma, and the United States.

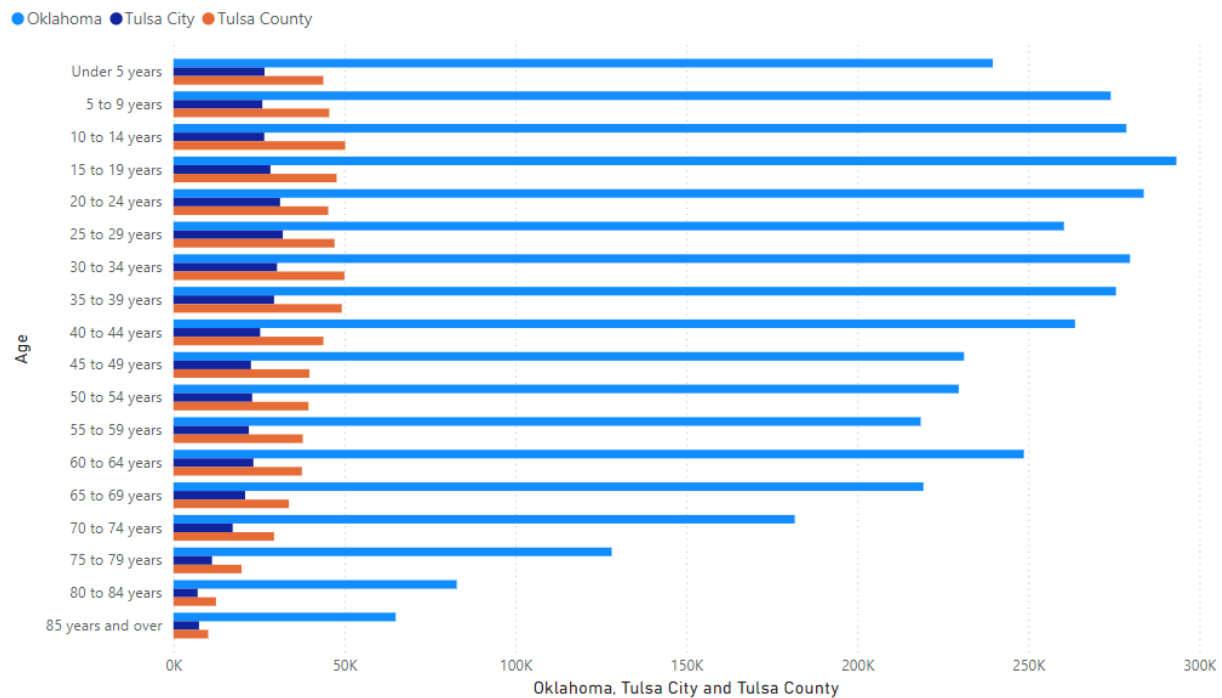
Table 2: Median Age, 2010- 2023

	2010	2020	2023	% Change from 2010 to 2023
United States	36.9	38.2	39.2	6.2%
Oklahoma	36.3	36.7	37.1	2.2%
Tulsa County	35.3	35.8	36.2	2.5%
Tulsa City	35.1	35.2	35.7	1.7%

Source: U.S. Census ACS 1-YR Estimates (DP05)

Figure 3 shows the distribution of different age groups by jurisdiction.

Figure 3: Population by Age, 2023



Source: 2023 ACS 1-YR Estimates (DP05)

Race & Ethnicity

The United States has long been a diverse country with people of all races and ethnicities calling it home. While Tulsa City is still majority White, there has been a consistent trend towards greater racial and ethnic diversity. Since 2010, the non-White population has grown in every jurisdiction. While the White and Black population has decreased, the “Other” and Asian race population has grown the most in Tulsa City. The White population is lower than the National, Oklahoma, and Tulsa County trends.

Table 3: Population by Race, 2010- 2023

Area	2010				2020				2023			
	White	Black	Asian	Other	White	Black	Asian	Other	White	Black	Asian	Other
United States	74.0%	12.5%	4.7%	8.8%	70.4%	12.6%	5.6%	11.4%	60.5%	12.1%	6.0%	21.4%
Oklahoma	74.0%	7.3%	1.7%	17.0%	71.1%	7.3%	2.2%	19.4%	64.6%	6.8%	2.3%	26.3%
Tulsa County	72.7%	10.6%	0.2%	16.5%	68.7%	10.0%	3.6%	17.7%	60.1%	9.4%	4.0%	26.5%
Tulsa City	67.4%	15.5%	2.2%	14.9%	63.3%	15.0%	3.5%	18.2%	53.1%	13.7%	4.1%	29.1%

Source: ACS 1-YR Estimates (DP05)

Over the years, Tulsa City has increased in diversity and analyzing the details of that change can provide valuable insight.

For Tulsa City, the Two or more race and the Hispanic population has shown the biggest growth. White and Black population has gradually decreased. The trend is like the Tulsa County, Oklahoma, and national trend.

Figure 4 shows the predominant racial or ethnic group by tract in the City. While the majority of the city is predominantly White, there are concentrations of Black or African American predominance in some northwestern tracts, and concentrations of Hispanic or Latino predominance in some northwestern and central eastern tracts.

Table 4: Racial and Ethnic Composition of Tulsa City, 2010- 2023

	2010	Percent	2020	Percent	2023	Percent
Race						
White	261,773	67.40%	254,796	63.30%	218,147	53.10%
Black or African American	60,173	15.50%	60,468	15.00%	56,287	13.70%
American Indian and Alaska Native	16,674	4.30%	18,196	4.50%	18,242	4.40%
Asian	8,591	2.20%	14,050	3.50%	16,705	4.10%
Native Hawaiian/Other Pac Islander	318	0.10%	522	0.10%	1,373	0.30%
Some other race	16,611	4.30%	18,558	4.60%	27,342	6.70%
Two or more races	24,107	6.20%	35,851	8.90%	72,819	17.70%
Ethnicity						
Hispanic	49,996	12.90%	68,715	17.10%	83,726	20.40%

Sources: ACS 1-YR Estimates (DP05)

Table 5: Racial and Ethnic Composition of Tulsa County, 2010- 2023

	2010	Percent	2020	Percent	2023	Percent
Race						
White	428,570	72.70%	446,746	68.70%	410,588	60.10%
Black or African American	62,253	10.60%	65,346	10.00%	64,417	9.40%
American Indian and Alaska Native	28,806	4.90%	33,424	5.10%	35,365	5.20%
Asian	12,920	2.20%	23,177	3.60%	27,174	4.00%
Native Hawaiian/Other Pac Islander	364	0.10%	656	0.10%	1,452	0.20%
Some other race	19,324	3.30%	22,037	3.40%	31,861	4.70%
Two or more races	37,520	6.40%	58,905	9.10%	112,011	16.40%
Ethnicity						
Hispanic	59,649	10.10%	85,014	13.10%	108,136	15.80%

Sources: ACS 1-YR Estimates (DP05)

Table 6: Racial and Ethnic Composition of Oklahoma, 2010- 2023

	2010	Percent	2020	Percent	2023	Percent
Race						
White	2,720,135	74.00%	2,809,793	71.10%	2,620,590	64.60%
Black or African American	267,179	7.30%	287,856	7.30%	274,031	6.80%
American Indian and Alaska Native	259,809	7.10%	303,791	7.70%	292,095	7.20%
Asian	61,581	1.70%	87,033	2.20%	94,802	2.30%
Native Hawaiian/Other Pacific Islander	3967	0.10%	6,418	0.20%	9,095	0.20%
Some other race	98,772	2.70%	109,614	2.80%	155,111	3.80%
Two or more races	263,896	7.20%	344,837	8.70%	608,100	15.00%
Ethnicity						
Hispanic	302,167	8.20%	431,467	10.90%	523,291	12.90%

Sources: ACS 1-YR Estimates (DP05)

Table 7: Racial and Ethnic Composition of USA, 2010- 2023

	2010	Percent	2020	Percent	2023	Percent
Race						
White	224,895,700	74.00%	229,960,813	70.40%	202,651,652	60.50%
Black or African American	37,978,752	12.50%	41,227,384	12.60%	40,619,972	12.10%
American Indian and Alaska Native	2,480,465	0.80%	2,688,614	0.80%	3,341,333	1.00%
Asian	14,185,493	4.70%	18,421,637	5.60%	20,052,323	6.00%
Native Hawaiian/Other Pacific Islander	491,673	0.20%	611,404	0.20%	662,417	0.20%
Some other race	16,603,808	5.50%	16,783,914	5.10%	24,848,381	7.40%
Two or more races	7,329,381	2.40%	16,875,542	5.20%	42,738,818	12.80%
Ethnicity						
Hispanic	47,727,533	15.70%	59,361,020	18.20%	65,140,277	19.40%

Sources: ACS 1-YR Estimates (DP05)

Figure 4: Predominant Racial or Ethnic Group, 2018- 2022

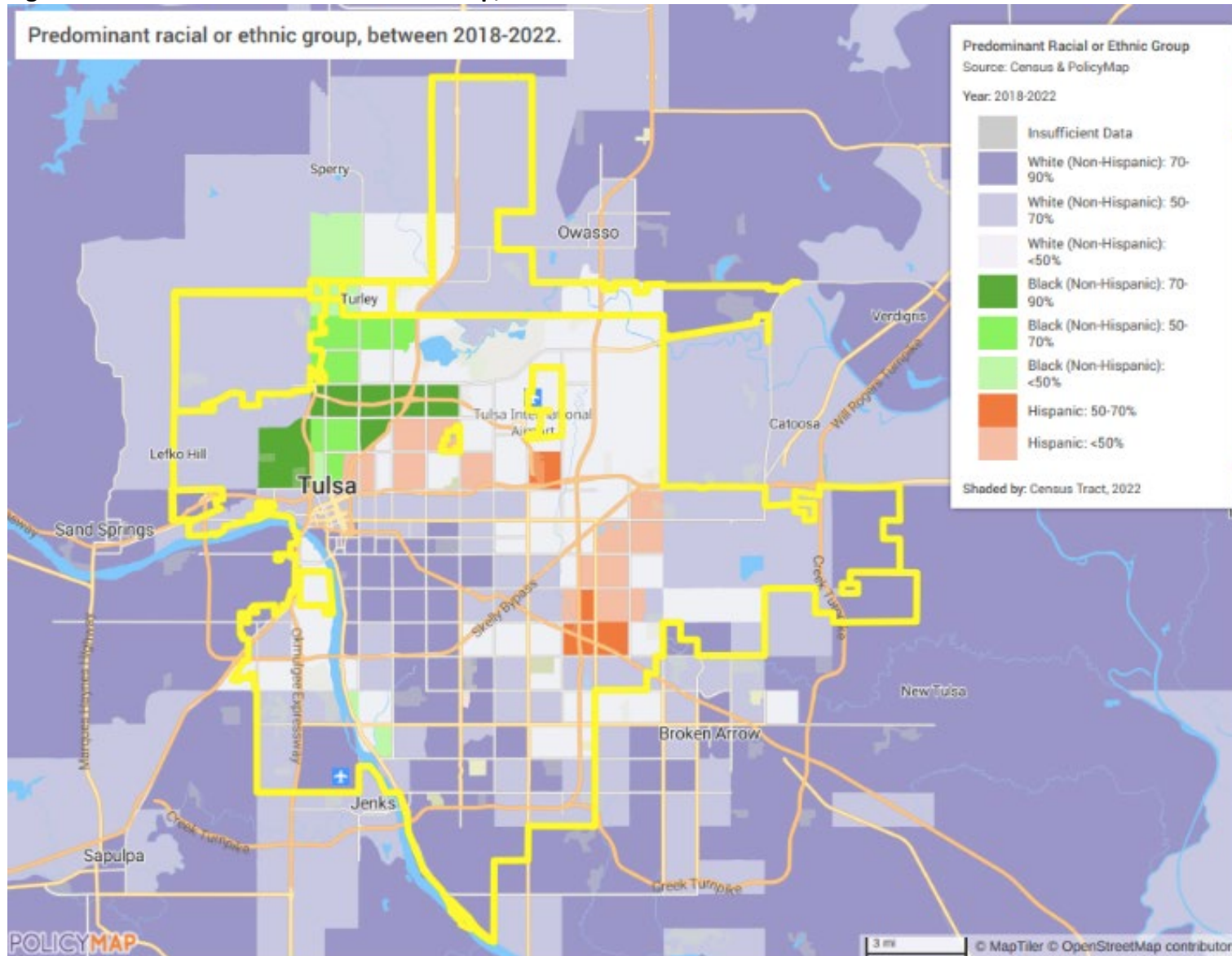


Figure 5 shows that between 2018 and 2022, the northwest tracts all saw the highest concentrations of Black or African American residents, with some tracts being 70% or more. Figure 6 shows the percentage change in population between 2017 and 2022. Not many areas of the City saw population growth and the majority of tracts saw population decreases.

Figure 5: Black & African American Population by Census Tract, 2018- 2022

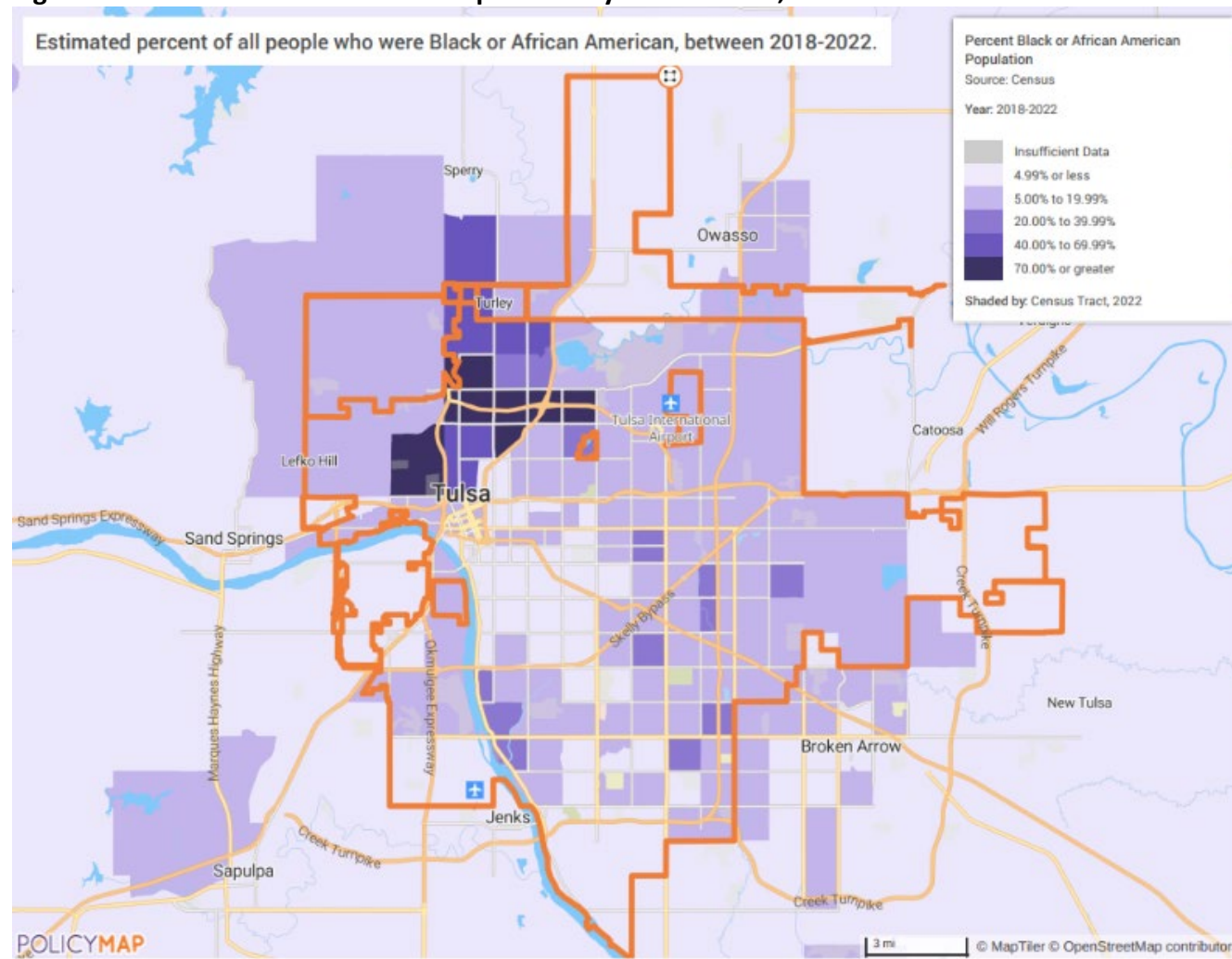
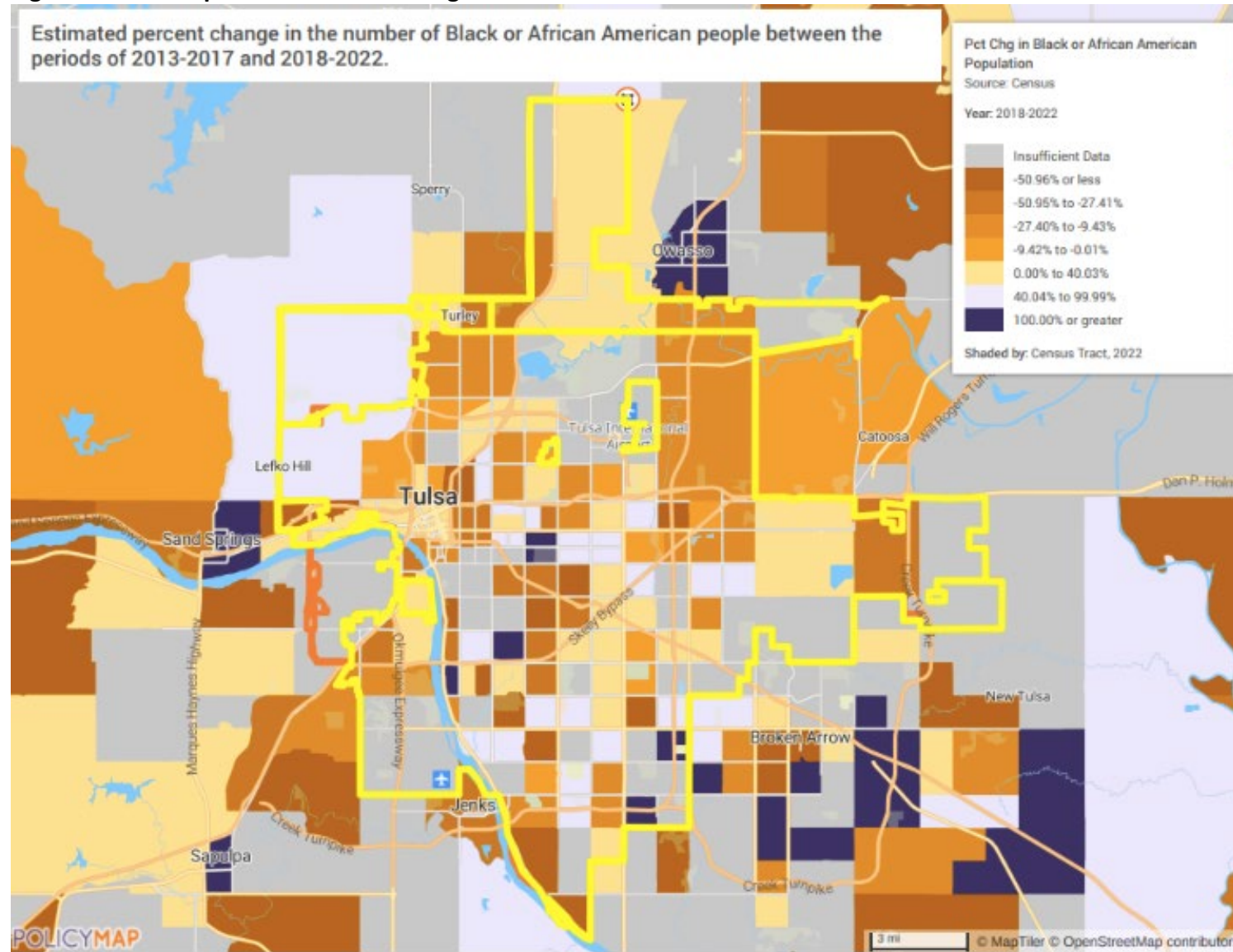


Figure 6: Black Population Percent Change Between 2013- 2017 and 2018- 2022



Ethnic Hispanic

The Hispanic population has grown significantly throughout the area. Tulsa City, Tulsa County and Oklahoma has had a higher increase in Hispanic population compared to National.

Table 8: Hispanic Population, 2010- 2023

Area	2010	Percent	2020	Percent	2023	Percent	% Change from 2010-2023
United States	47,727,533	15.70%	59,361,020	18.20%	65,140,277	19.40%	26.7%
Oklahoma	302,167	8.20%	431,467	10.90%	523,291	12.90%	42.3%
Tulsa County	59,649	10.10%	85,014	13.10%	108,136	15.80%	44.8%
Tulsa City	49,996	12.90%	68,715	17.10%	83,726	20.40%	40.3%

Sources: ACS 1-YR Estimates (DP05)

Figure 7 shows that the Hispanic population has higher concentrations of residents living toward the eastern side of the City. Figure 8 indicates many areas of growth in the Hispanic population between 2017 and 2022, with the darker tracts indicating more growth.

Figure 7: Hispanic Population by Census Tract, 2018- 2022

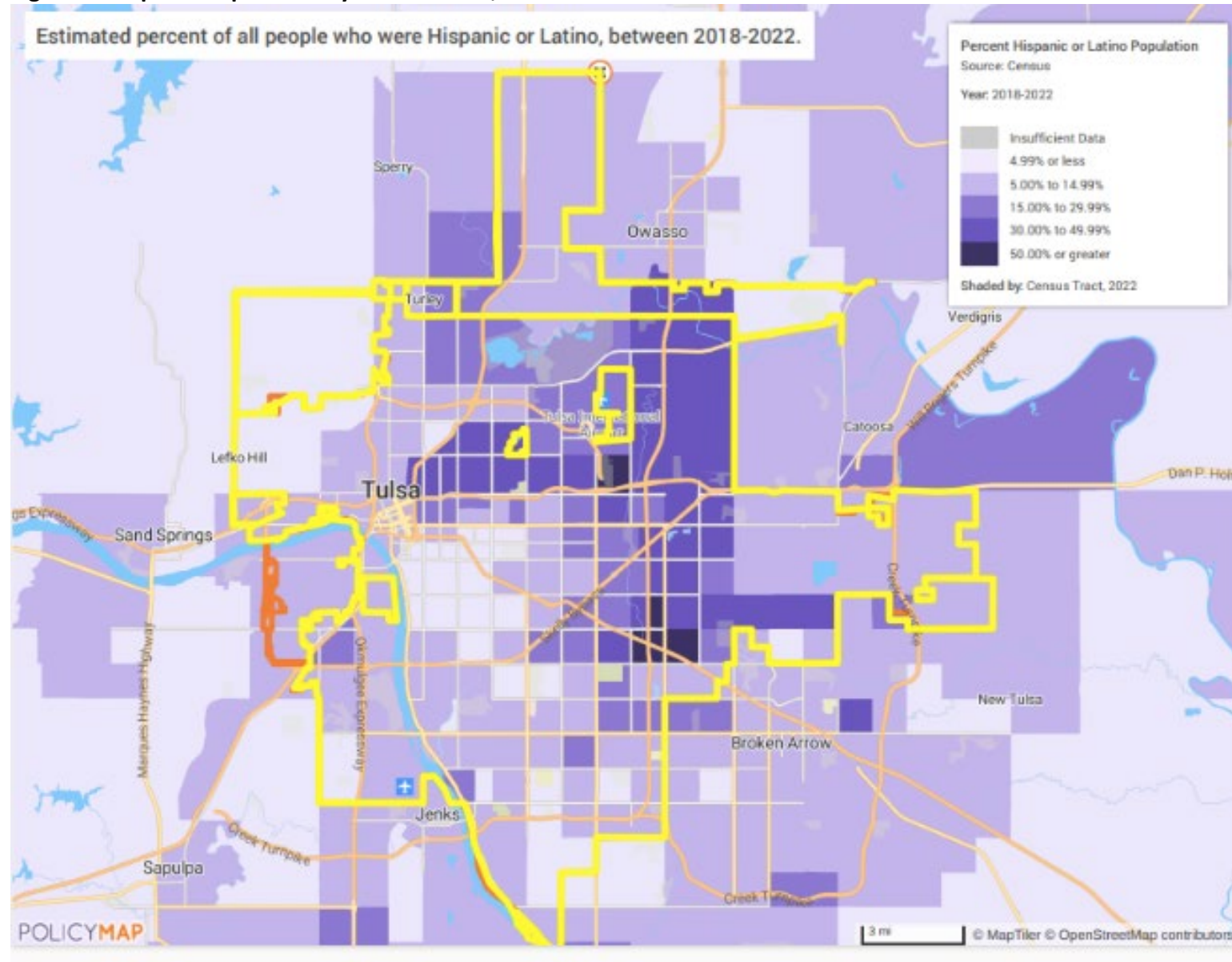
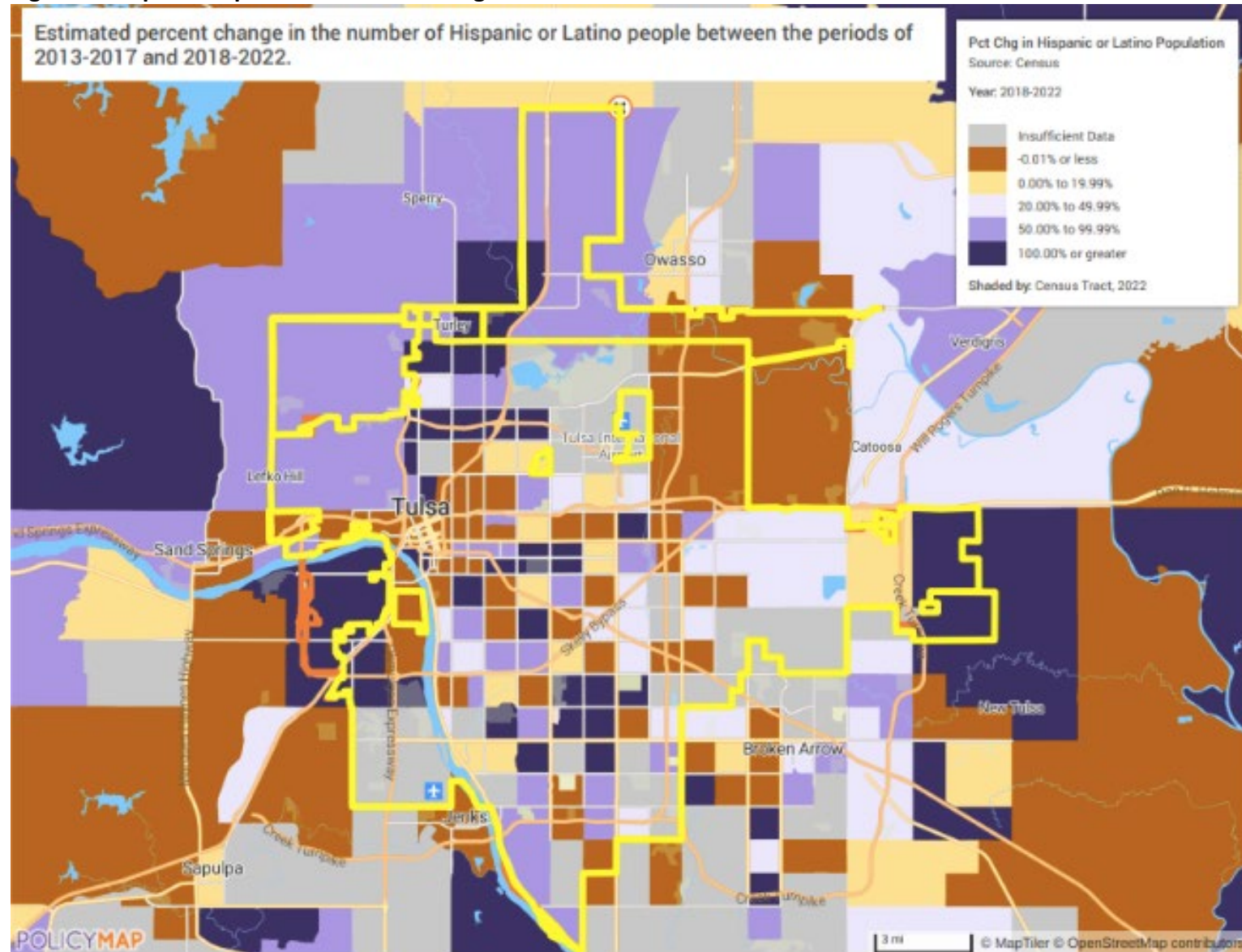


Figure 8: Hispanic Population Percent Change Between 2013- 2017 and 2018- 2022



Foreign Born

Since 2010, nearly every jurisdiction has seen the proportion of their population that is foreign-born grow. According to the data displayed in Table 9, Tulsa City and Tulsa County have the most increase and concentration of foreign born and are higher than the Oklahoma and National statistics.

Table 9: Population by Place of Birth

	2010			2020			2023			% Change 2010- 2023
	Total Population	Foreign Born	% Foreign Born	Total Population	Foreign Born	% Foreign Born	Total Population	Foreign Born	% Foreign Born	
United States	303,965,272	38,675,012	12.7%	326,569,308	44,125,628	13.5%	334,914,896	47,831,411	14.3%	23.7%
Oklahoma	3,675,339	192,788	5.2%	3,949,342	237,812	6.0%	4,053,824	247,828	6.1%	28.5%
Tulsa County	589,757	44,112	7.5%	650,291	57,985	8.9%	682,868	68,926	10.1%	56.3%
Tulsa City	388,247	36,235	9.3%	402,441	45,170	11.2%	410,915	52,487	12.8%	44.9%

Sources: ACS 1-YR Estimates (DP02)

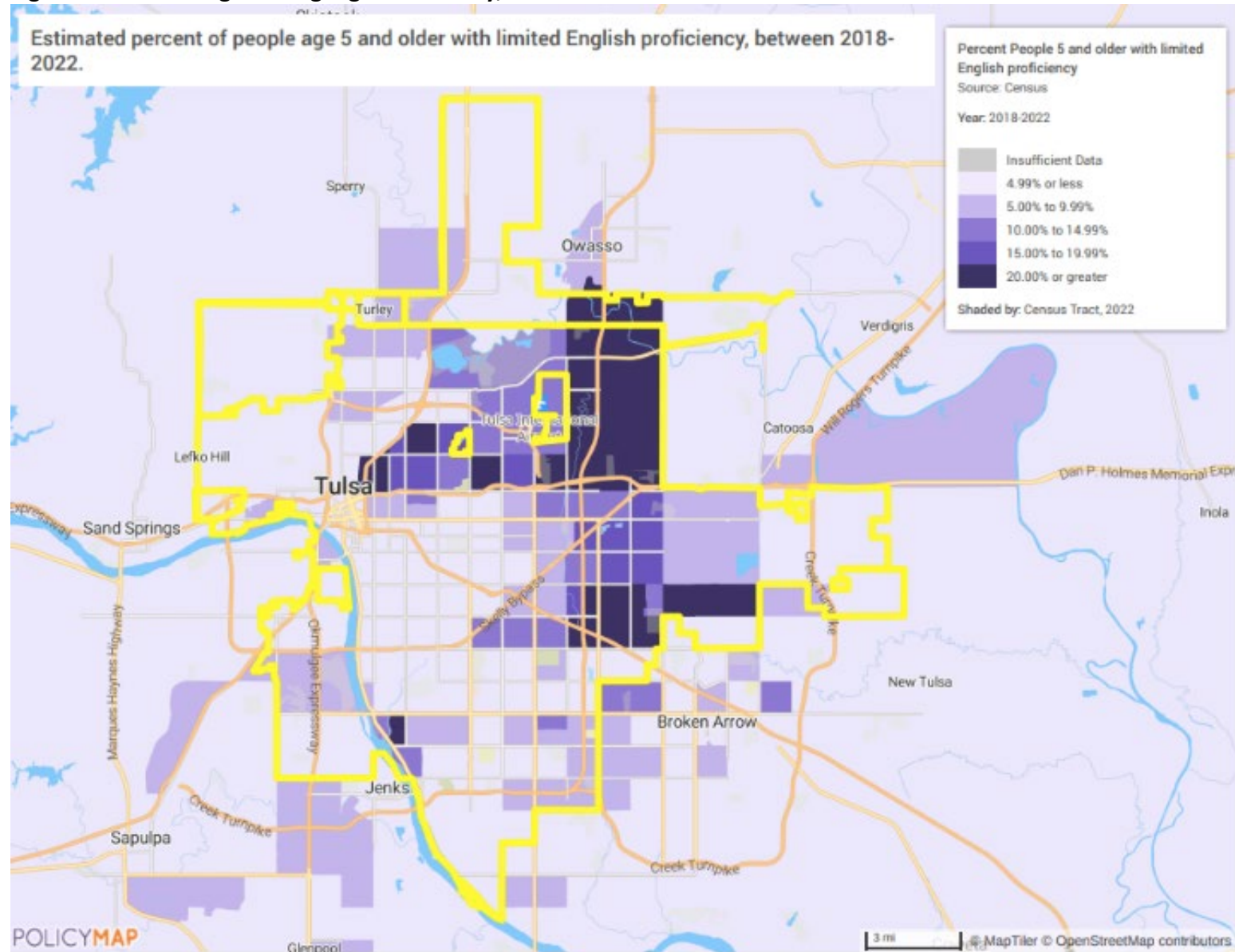
The number of households who speak English Less than “Very Well” by percent has decreased marginally from 2010 to 2023. Spanish remains the most common language spoken. Figure 9 shows that LEP residents have higher concentrations in the central and eastern tracts of the City.

Table 10: Language Spoken at Home

	2010			2020			2023		
	English Less than "Very Well" %	Spanish %	Asian %	English Less than "Very Well" %	Spanish %	Asian %	English Less than "Very Well" %	Spanish %	Asian %
United States	8.70%	12.50%	3.10%	8.20%	13.20%	3.50%	8.70%	13.70%	3.60%
Oklahoma	3.80%	5.90%	1.30%	3.90%	7.30%	1.60%	4.20%	8.00%	1.70%
Tulsa County	5.30%	7.70%	1.60%	5.70%	10.20%	2.50%	6.90%	11.40%	2.90%
Tulsa City	7.00%	9.90%	1.70%	7.70%	14.00%	2.50%	9.30%	15.90%	3.00%

Source ACS 1-YR Estimates (DP02)

Figure 9: Limited English Language Proficiency, 2018- 2022



Disability Status

As the population ages, the disability rate in a community starts to go up. Residents who reported having disabilities (including self-reported disabilities and formal medical diagnoses) often have unique housing needs and may have reduced opportunities to earn an income. The disability rate in Tulsa City is less than the National, State, and County rates. Oklahoma has the highest disability rate.

Table 11: Disability Status

	2010		2020		2023		% Change 2010-2023	Increase by %
	Estimate	Percent	Estimate	Percent	Estimate	Percent		
United States	36,354,712	11.90%	40,786,461	12.70%	44,741,326	13.60%	23.07%	1.70%
Oklahoma	576,551	15.70%	626,849	16.20%	689,229	17.40%	19.54%	1.70%
Tulsa County	80,846	13.50%	86,188	13.40%	100,862	14.90%	24.76%	1.40%
Tulsa City	58,172	15.00%	56,870	14.30%	65,158	16.10%	12.01%	1.10%

Source ACS 1-YR Estimates (S1810)

Data note: Disability status for the civilian non-institutionalized population 5 years and over.

Data note: % Change from 2010 to 2023 is by change in percentage.

In Tulsa City, the disability rate by age is similar to the state’s rate as a whole. Nearly 50% of residents over 75 years and over have a disability. This elderly population is likely on a fixed income and may need support to maintain or secure safe and stable housing.

Table 12: Disability and Age, 2023

Age	United States		Oklahoma		Tulsa County		Tulsa City	
	Estimated # of People with Disability	Percent of Group	Estimated # of People with Disability	Percent of Group	Estimated # of People with Disability	Percent of Group	Estimated # of People with Disability	Percent of Group
Under 5 years	128,992	0.70%	3,396	1.40%	282	0.60%	282	1.10%
5 to 17 years	3,549,258	6.50%	59,540	8.20%	9,937	7.90%	6,063	8.70%
18 to 34 years	6,357,314	8.60%	97,948	10.70%	15,834	10.00%	11,686	11.30%
35 to 64 years	15,826,514	12.60%	265,157	18.50%	39,034	15.90%	25,480	17.60%
65 to 74 years	8,230,087	23.90%	124,579	31.60%	17,305	27.60%	10,748	28.30%
75 years and over	10,649,161	45.30%	138,609	52.80%	18,470	46.20%	10,899	45.30%

Source ACS 1-YR Estimates (S1810)

Data note: Disability status for the civilian non-institutionalized population 5 years and over.

The disability rate in the jurisdiction by race is consistent with that of the National and State.

Table 13: Disability and Race Comparison

Race	United States		Oklahoma		Tulsa County		Tulsa City	
	Estimated # of People with Disability	Percent of Group	Estimated # of People with Disability	Percent of Group	Estimated # of People with Disability	Percent of Group	Estimated # of People with Disability	Percent of Group
White	29,107,086	14.60%	477,314	18.60%	64,819	16.00%	36,965	17.20%
Black or African American	5,907,483	15.00%	48,193	18.60%	10,981	17.40%	10,914	19.80%
American Indian and Alaska Native	520,200	15.90%	49,582	17.30%	5,218	14.80%	3,287	18.10%
Asian	1,673,887	8.40%	8,316	8.90%	2,004	7.40%	1,281	7.70%
Native Hawaiian/Other Pac Islander	92,002	14.30%	814	9.10%	N	N	N	N
Some other race	2,547,021	10.30%	18,694	12.20%	3,198	10.10%	2,932	10.80%
Two or more races	4,893,647	11.60%	86,316	14.50%	14,481	13.00%	9,632	13.30%
Ethnicity								
Hispanic	6,844,958	10.60%	56,347	11.00%	8,847	8.20%	6,957	8.40%

Source 2023 ACS 1-YR Estimates (S1810)

Figure 10 shows the rate of disability throughout the City between 2018 and 2022, and Figure 11 shows the percentage change in disability rates between 2017 and 2022. Tracts toward the outer edges of the City saw higher concentrations of disability percent increases.

Figure 10: Tulsa City Disability Rate, 2018- 2022

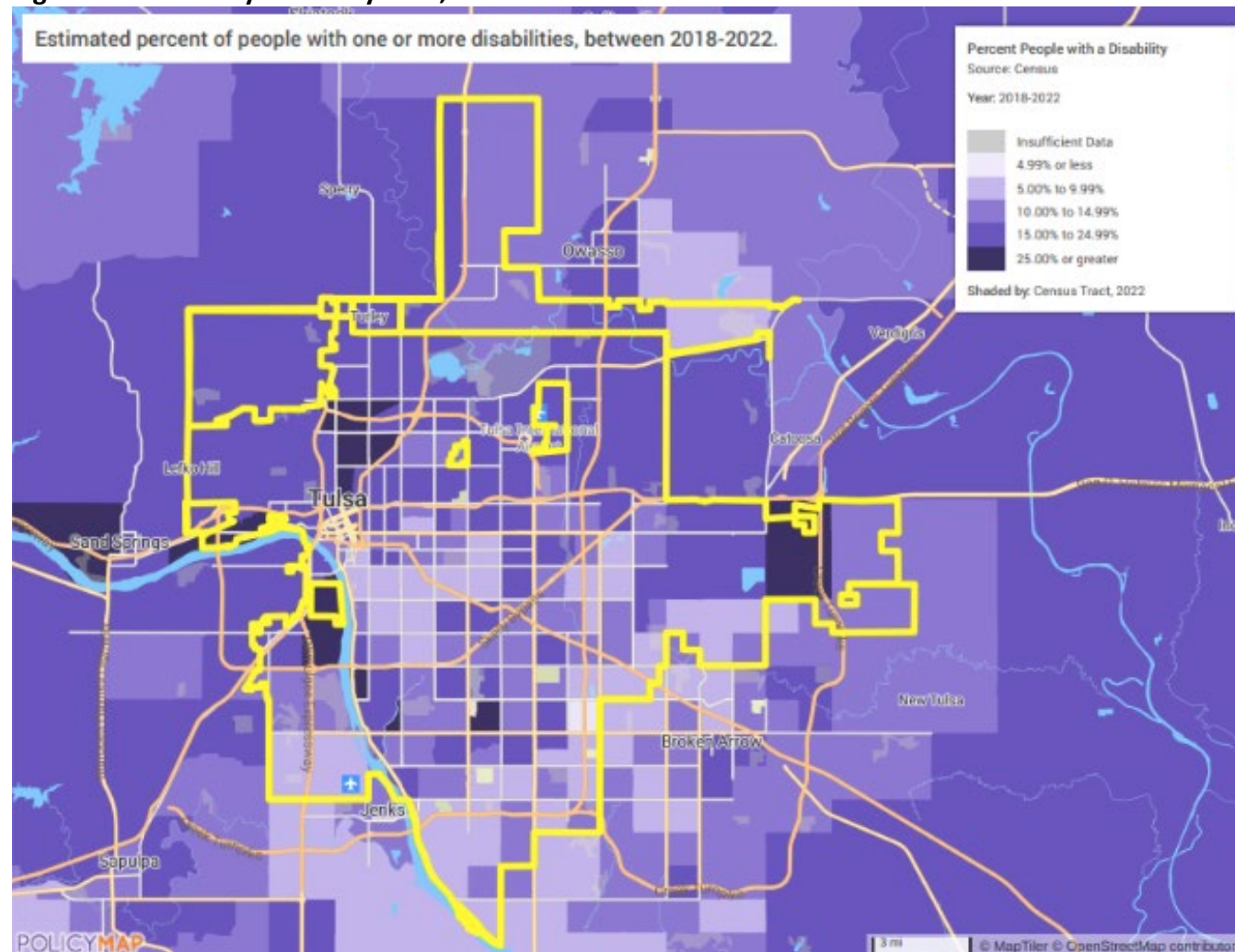
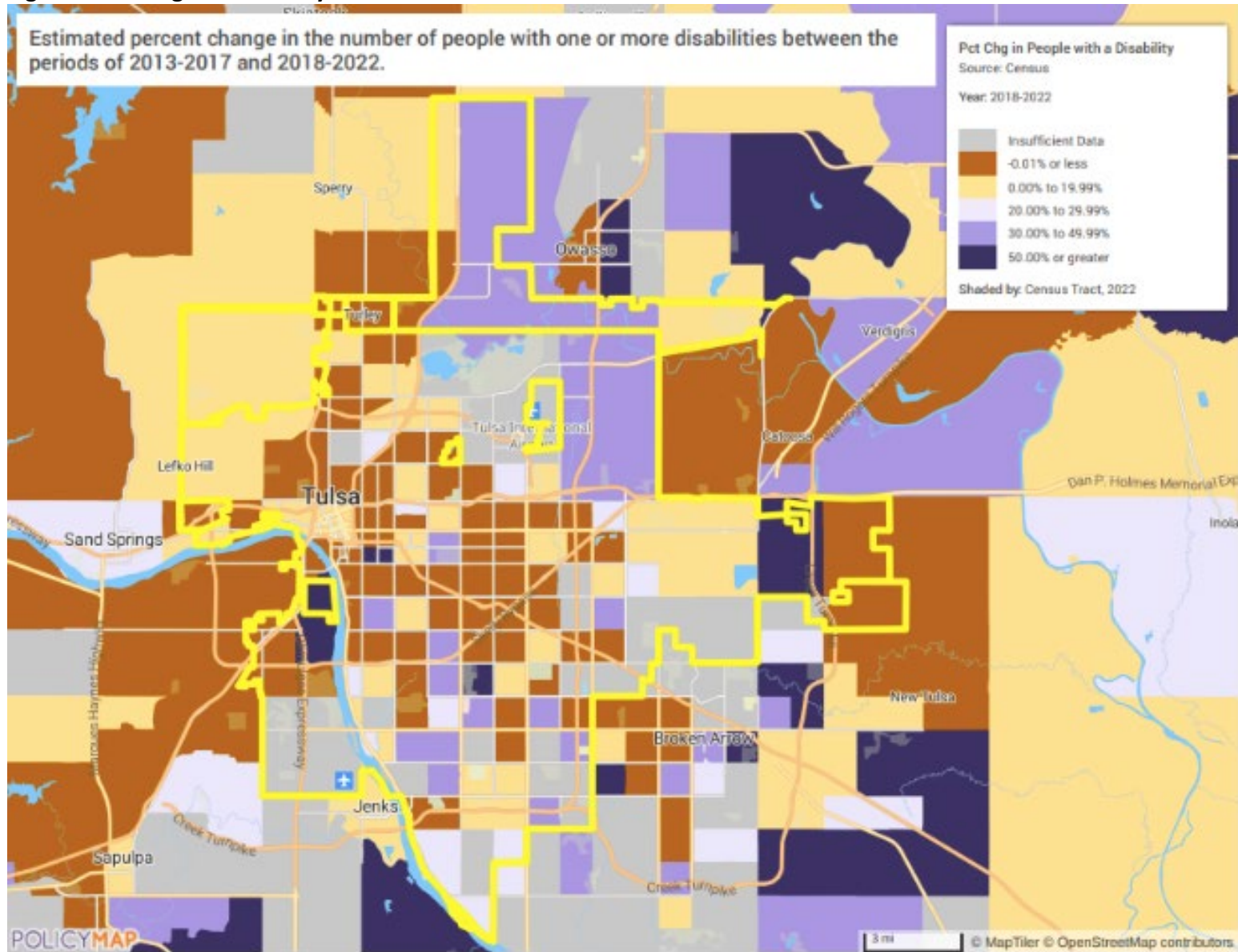


Figure 11: Change in Disability Rates Between 2013- 2017 and 2018- 2022



Income

Tulsa City median income is lower than the County, State and the National. Also, the median income growth from 2010 to 2023 is the lowest. Figure 12 shows that there are higher median household incomes generally concentrated in more northern and southern areas of the City, while the central tracts typically have lower median household incomes. Figure 13 illustrates the change in median household incomes between 2017 and 2022, with the darkest purple shaded tracts indicating increases of at least 50%.

Table 14: Median Income, 2010- 2023

	2010	2020	2023	
	Estimate	Estimate	Estimate	% Change 2010-2023
United States	51,914	64,994	77,719	49.7%
Oklahoma	42,979	53,840	62,138	44.6%
Tulsa County	45,613	57,024	65,479	43.6%
Tulsa City	39,289	49,474	56,821	44.6%

Source ACS 1-YR Estimates (S1901)

Figure 12: Median Household Income, 2018- 2022

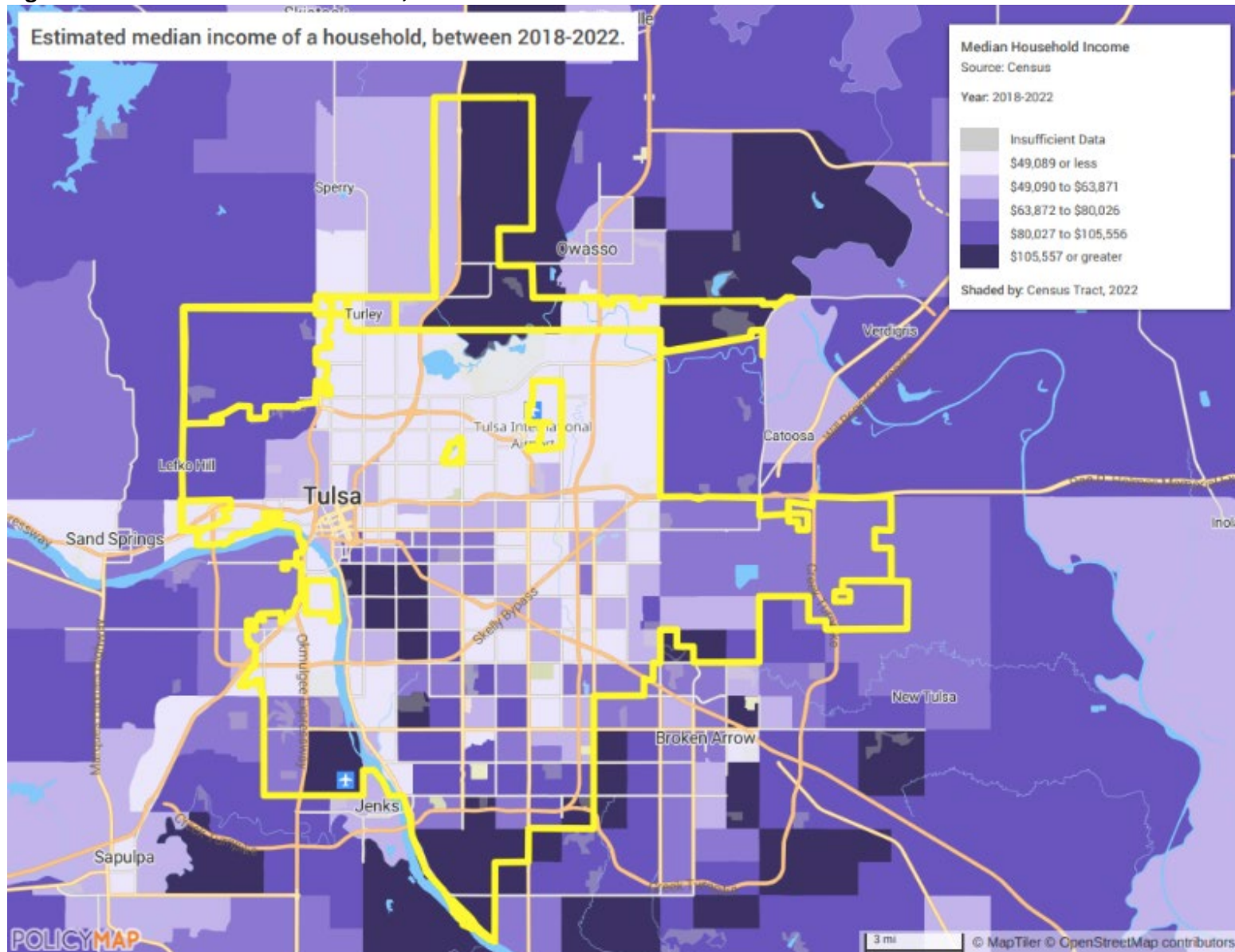
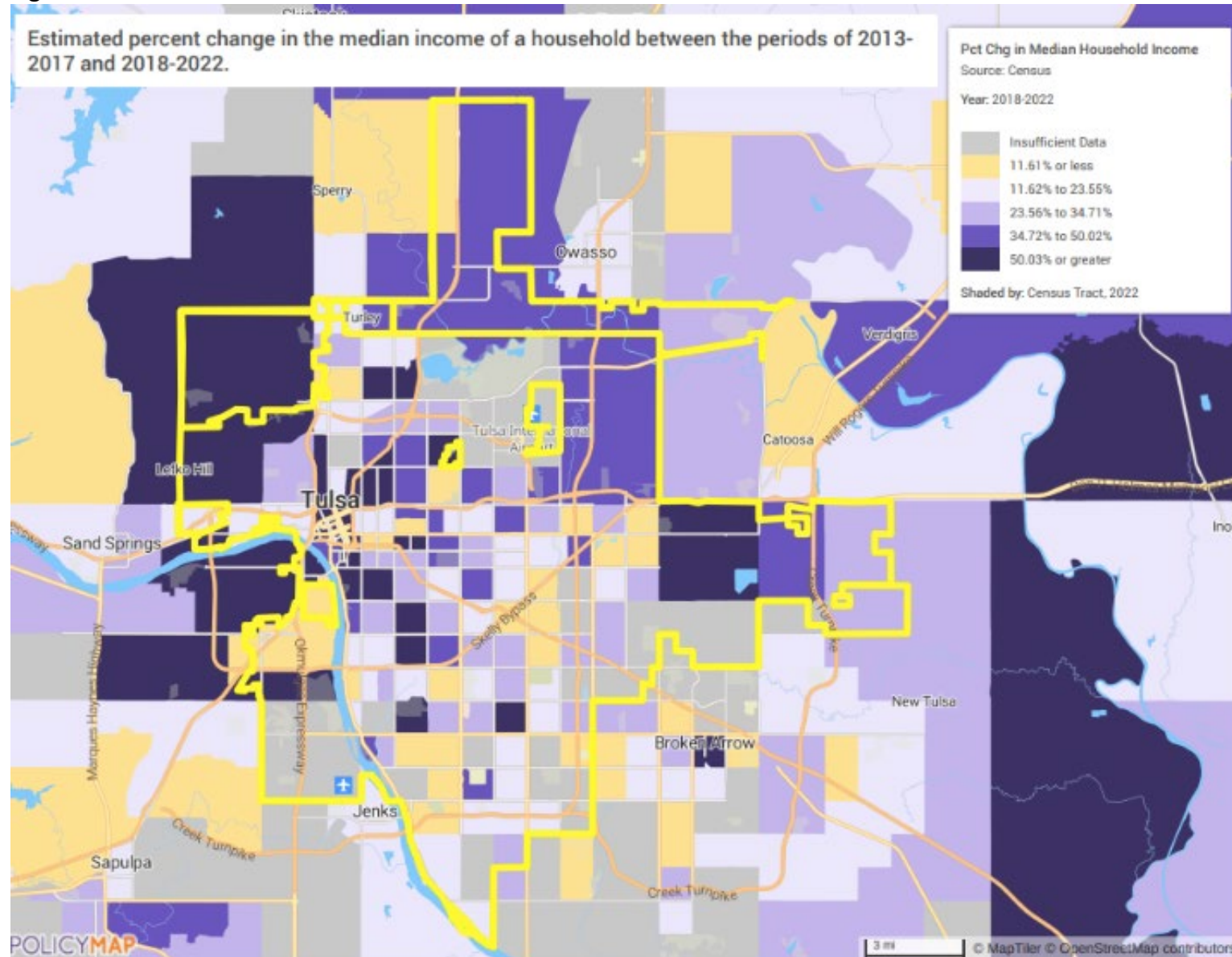
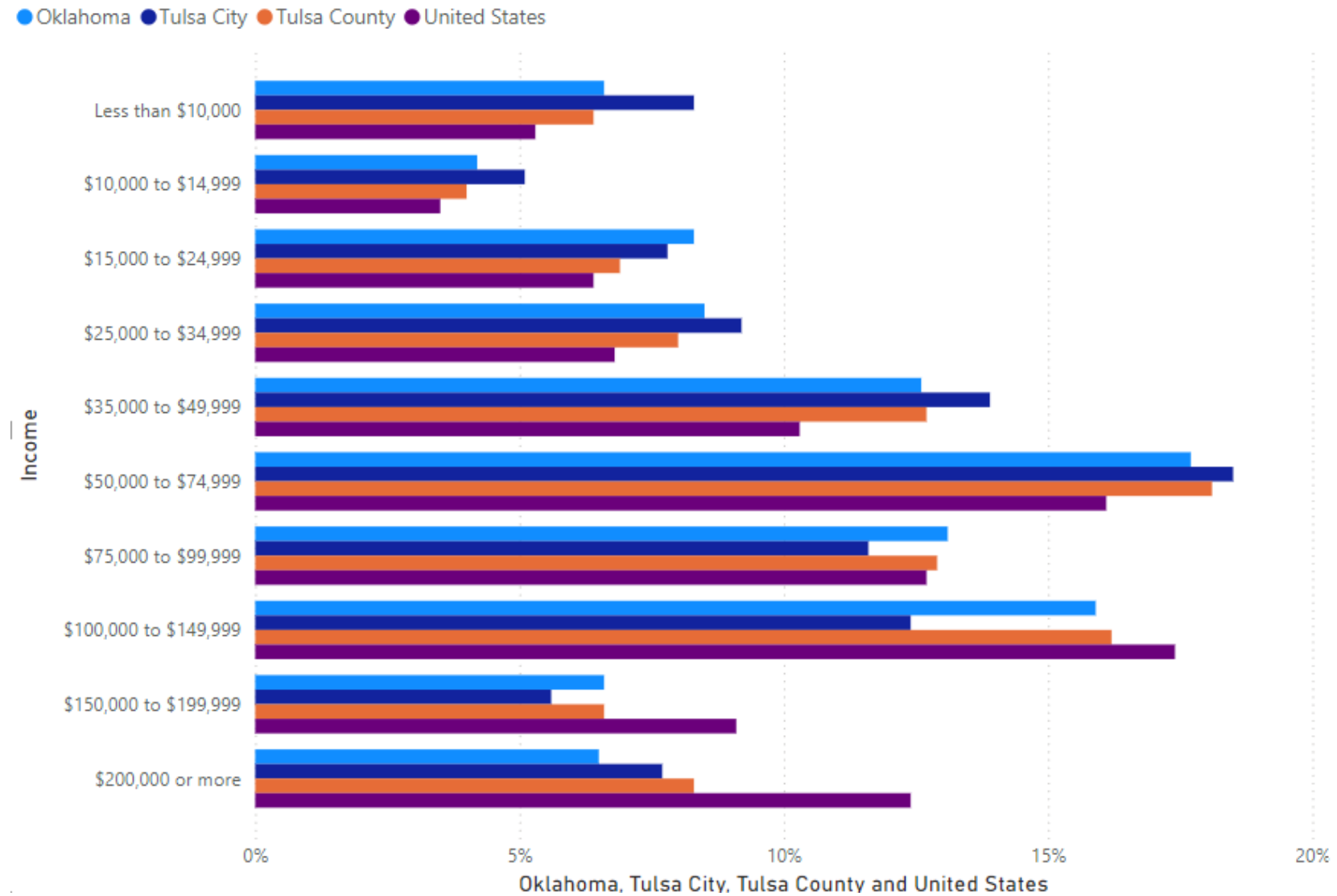


Figure 13: in Median Household Income Between 2013- 2017 and 2018- 2022



As can be seen from Figure 14 below, Tulsa City has more households with lower income.

Figure 14: Household Income, 2023



Median Income by Race/Ethnicity

Unfortunately, it is often the case that there is a correlation between a person's median income and their race or ethnicity. Throughout the area, Black or African American residents earn less than any other racial or ethnic group. Generally, Asian and White residents have the highest median income by race or ethnicity.

Table 15: Median Income by Race/Ethnicity, 2023

	United States	Oklahoma	Tulsa County	Tulsa City
Race				
White	82,531	66,012	72,690	63,781
Black or African American	53,927	43,527	40,345	36,474
American Indian and Alaska Native	61,061	52,393	62,221	47,018
Asian	111,817	72,144	71,405	63,505
Native Hawaiian/Other Pac Islander	74,257	83,518	60,000	60,795
Some other race	66,250	55,743	58,470	57,272
Two or more races	73,382	59,936	58,894	54,494
Ethnicity				
Hispanic	69,467	56,613	58,983	56,128

Source: 2023 ACS 1-YR Estimates (\$1903)

Household Composition

There is a noticeable difference in the household composition across jurisdictions. Tulsa City has the lowest average household size.

Table 16: Average Household Size of Occupied Housing Units by Tenure, 2023

	United States	Oklahoma	Tulsa County	Tulsa City
Average Household Size	2.49	2.48	2.44	2.31
Owner occupied Units	2.61	2.61	2.62	2.50
Renter occupied Units	2.25	2.22	2.18	2.11

Source: 2023 ACS 1-YR Estimates (DP04, S1101)

Throughout the area, the most common household composition is a married family household. Tulsa City is the exception with higher nonfamily households. The Single Female Adult households is much higher than the Single Male Adult households.

Table 17: Household Composition, 2023

	Total HH	Married Couple Family HH	%Married Couple-Family HH	Single Male Adult HH	% Single Male Adult HH	Single Female Adult HH	% Single Female Adult HH	Non Family HH	% Non-Family HH
United States	131,332,360	61,421,188	46.8%	6,750,842	5.1%	15,873,654	12.1%	47,286,676	36.0%
Oklahoma	1,589,105	735,765	46.3%	87,124	5.5%	195,429	12.3%	570,787	35.9%
Tulsa County	275,702	118,370	42.9%	16,827	6.1%	35,185	12.8%	105,320	38.2%
Tulsa City	173,905	62,262	35.8%	10,793	6.2%	23,907	13.7%	76,943	44.2%

Source: 2023 ACS 1-YR Estimates (S1101)

Tulsa City has the lowest percentage of households with children under 18 years of age.

Table 18: Households With Own Children Under 18 Years

	2010			2020			2023		
	Total HH	HHs w/Children	%	Total HH	HHs w/Children	%	Total HH	HHs w/Children	%
United States	114,235,996	34,990,015	30.6%	122,354,219	33,410,645	27.3%	131,332,360	33,636,388	25.6%
Oklahoma	1,421,705	425,149	29.9%	1,493,569	422,118	28.3%	1,589,105	436,707	27.5%
Tulsa County	238,715	72,427	30.3%	253,909	73,934	29.1%	275,702	76,326	27.7%
Tulsa City	164,888	44,489	27.0%	163,368	42,300	25.9%	173,905	42,635	24.5%

Source ACS 1-YR Estimates (S1101)

In general, residents grow increasingly likely to be homeowners as they age. The rate of homeownership is over 50% for all age groups over the age of 45. When residents reach approximately the age of 85 the rate of homeownership starts to decline.

Figure 15: Tulsa City Households by Tenure and Age of Householder, 2023

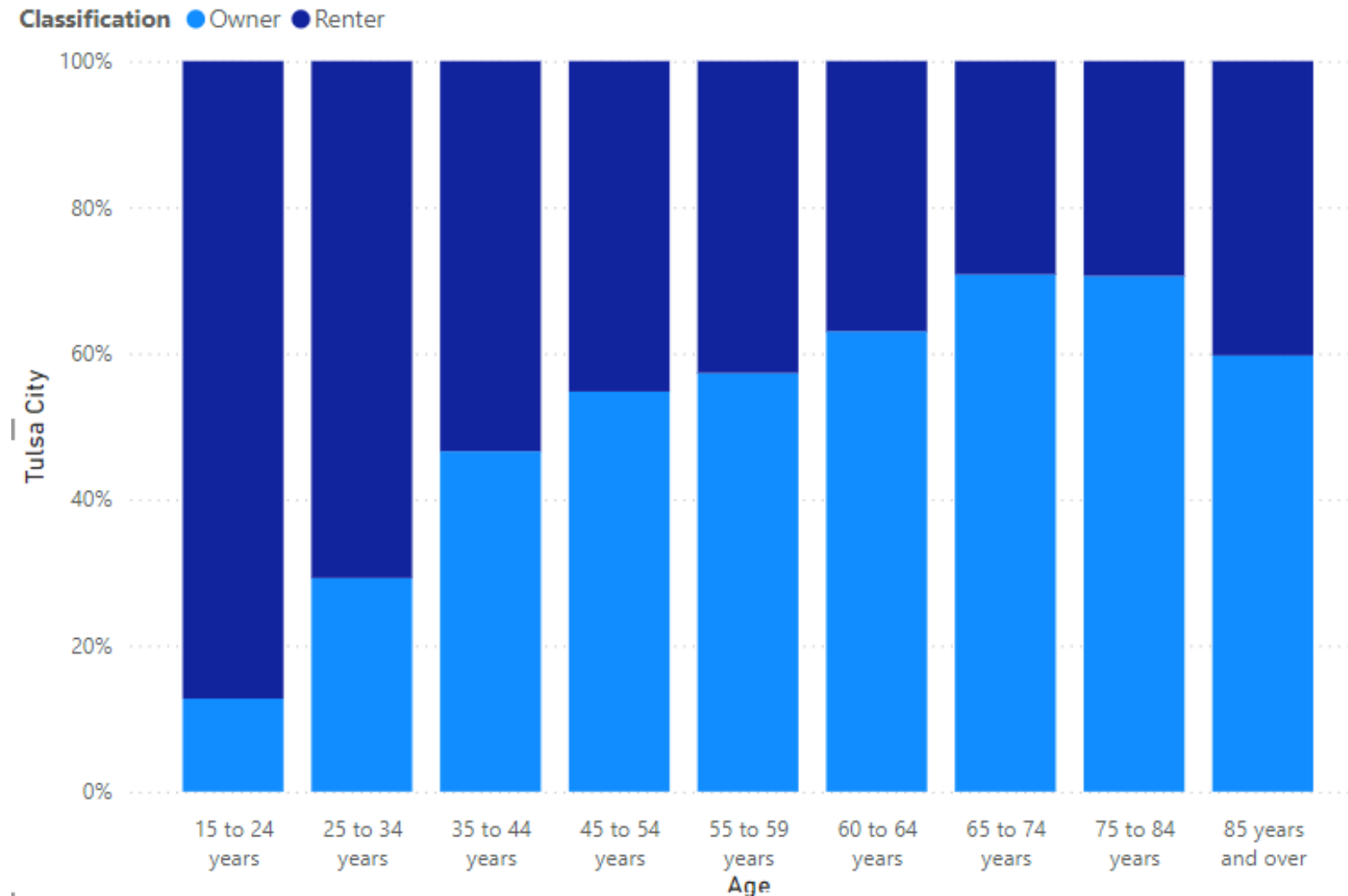
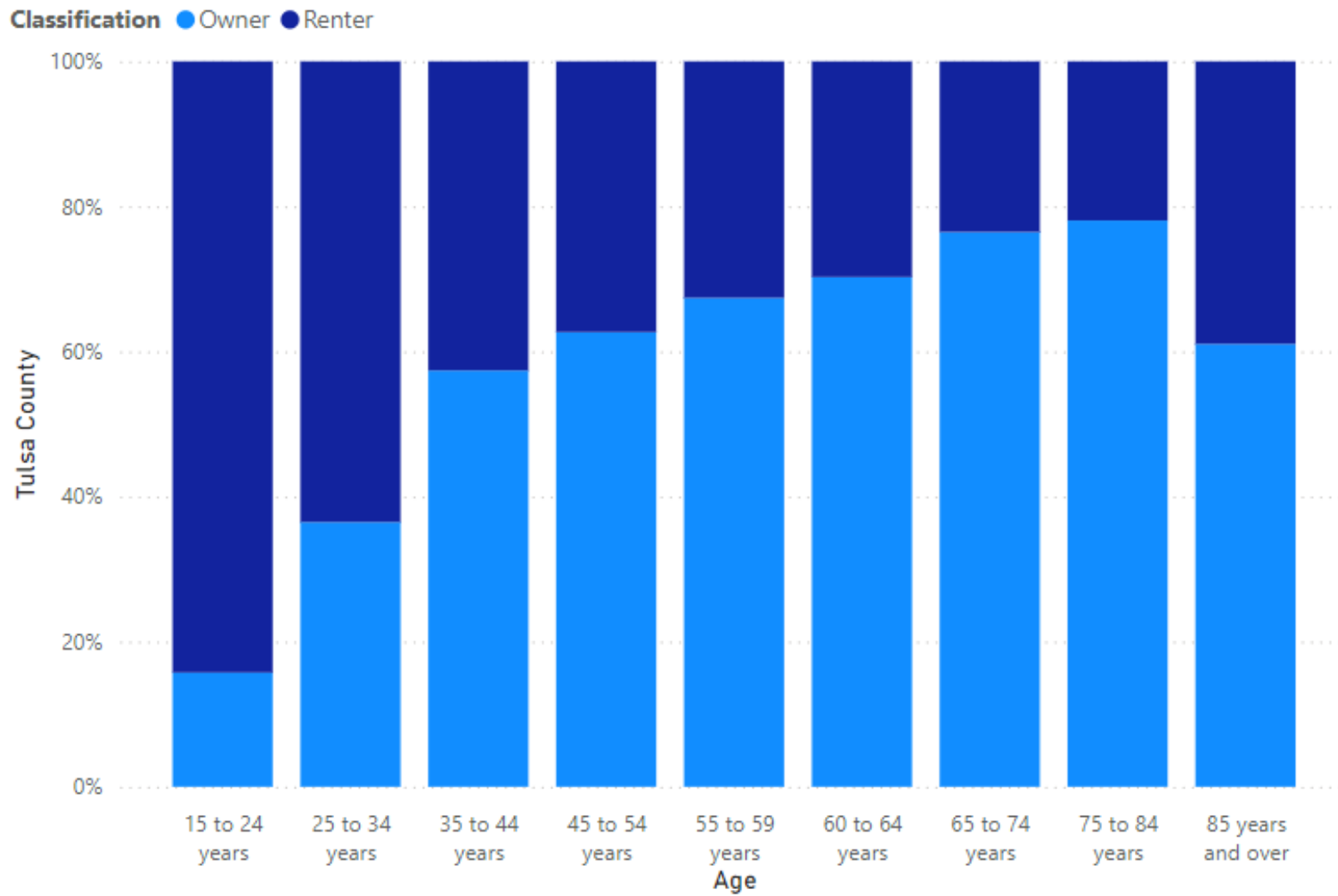
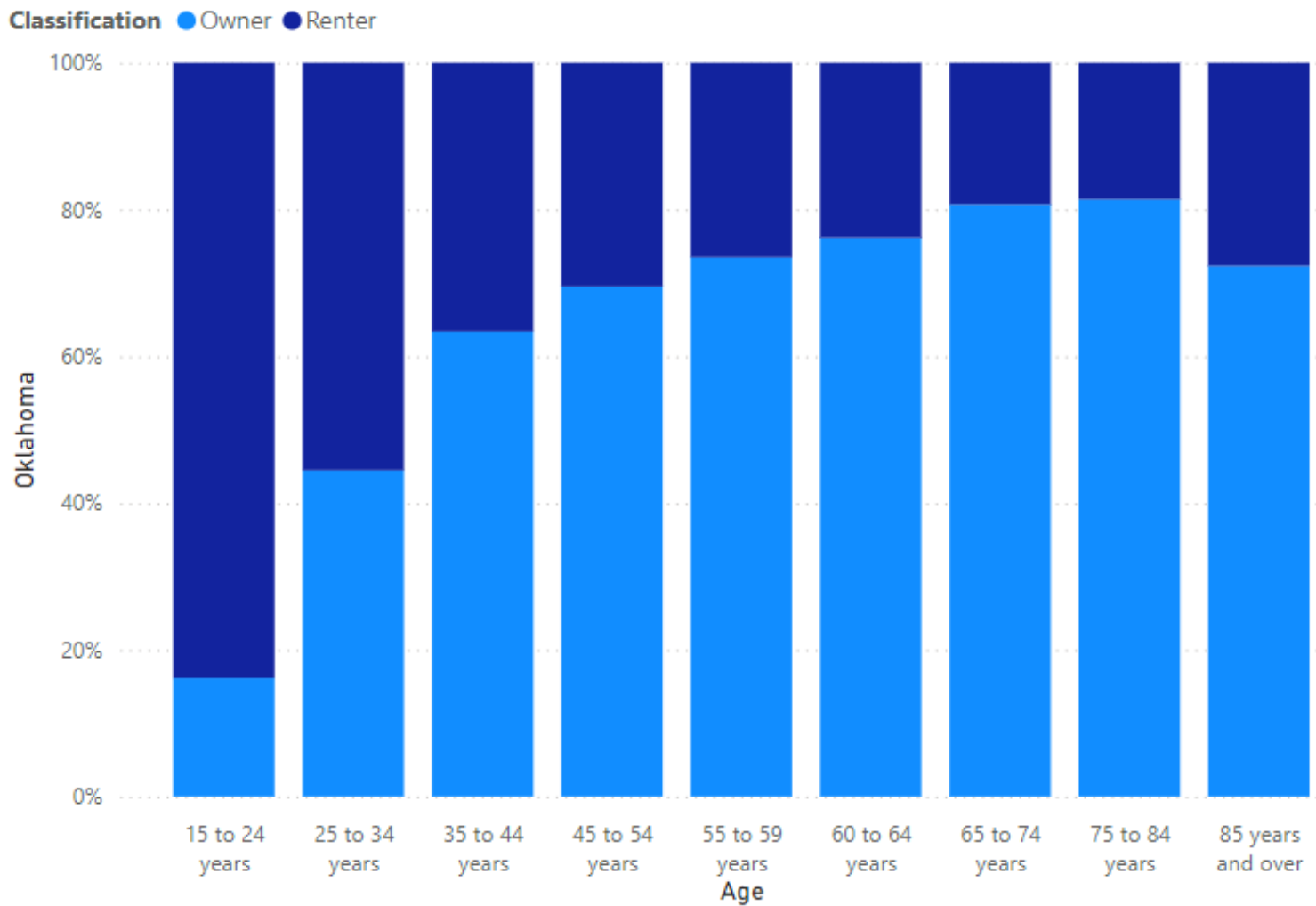


Figure 16: Tulsa County Households by Tenure and Age of Householder, 2023



The pattern seen above in jurisdictions is very similar to the one seen in the state as a whole. Again, homeownership rates increase until the 85 years or older age group decreases slightly.

Figure 17: Oklahoma Households by Tenure and Age of Householder, 2023



Source: American Community Survey 2023 B25007

The following chart shows the tenure demographic change that happens after residents become 55 years old or older. Before 55, the largest group is renters in 2+ household homes. As the population gets older the prevalence of multi-person homes decreases, and single-person homes become more common. Homeownership rates also increase significantly.

Figure 18: Tulsa City Tenure by Household Size and Age of Householder, 2023

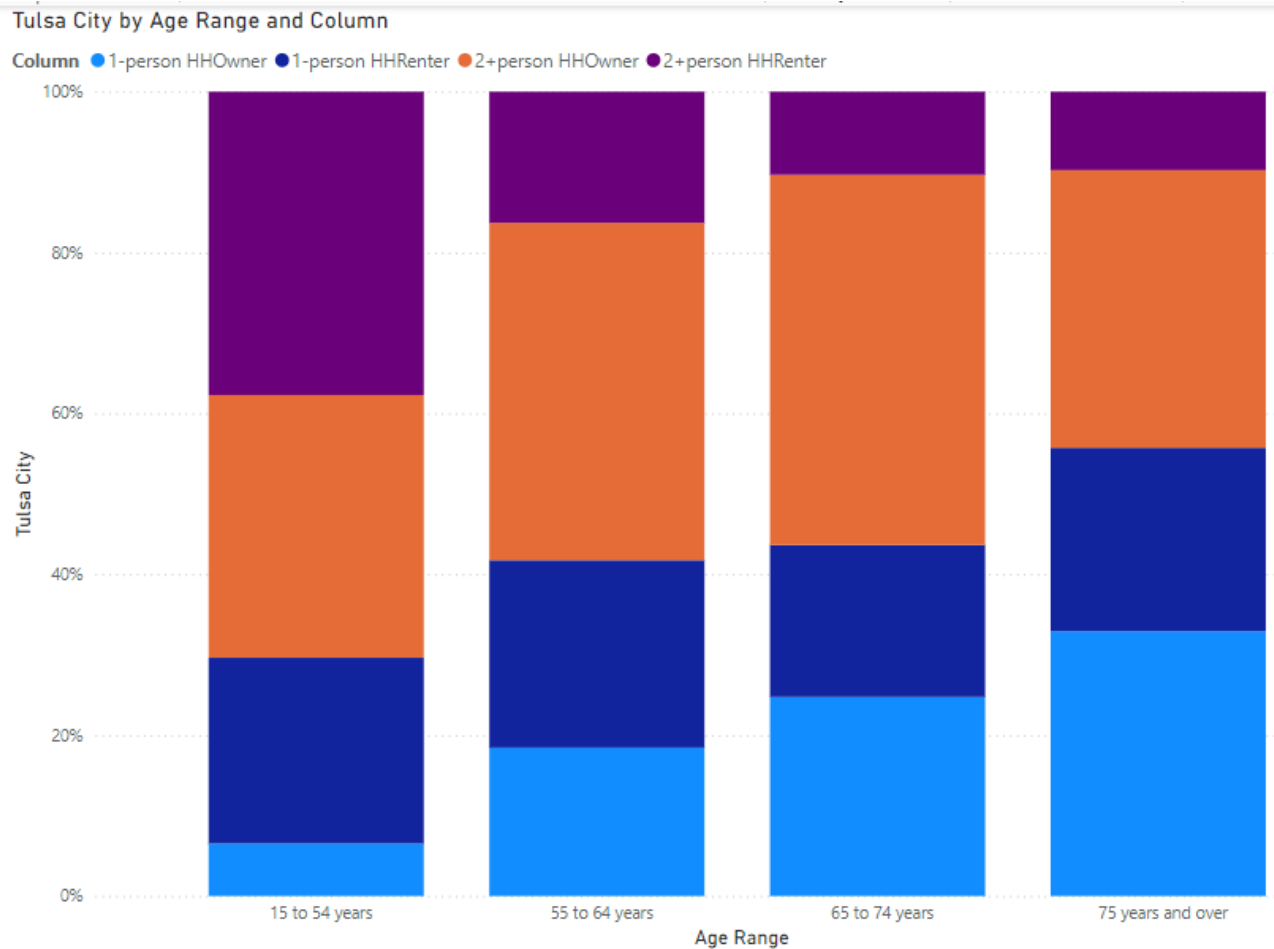
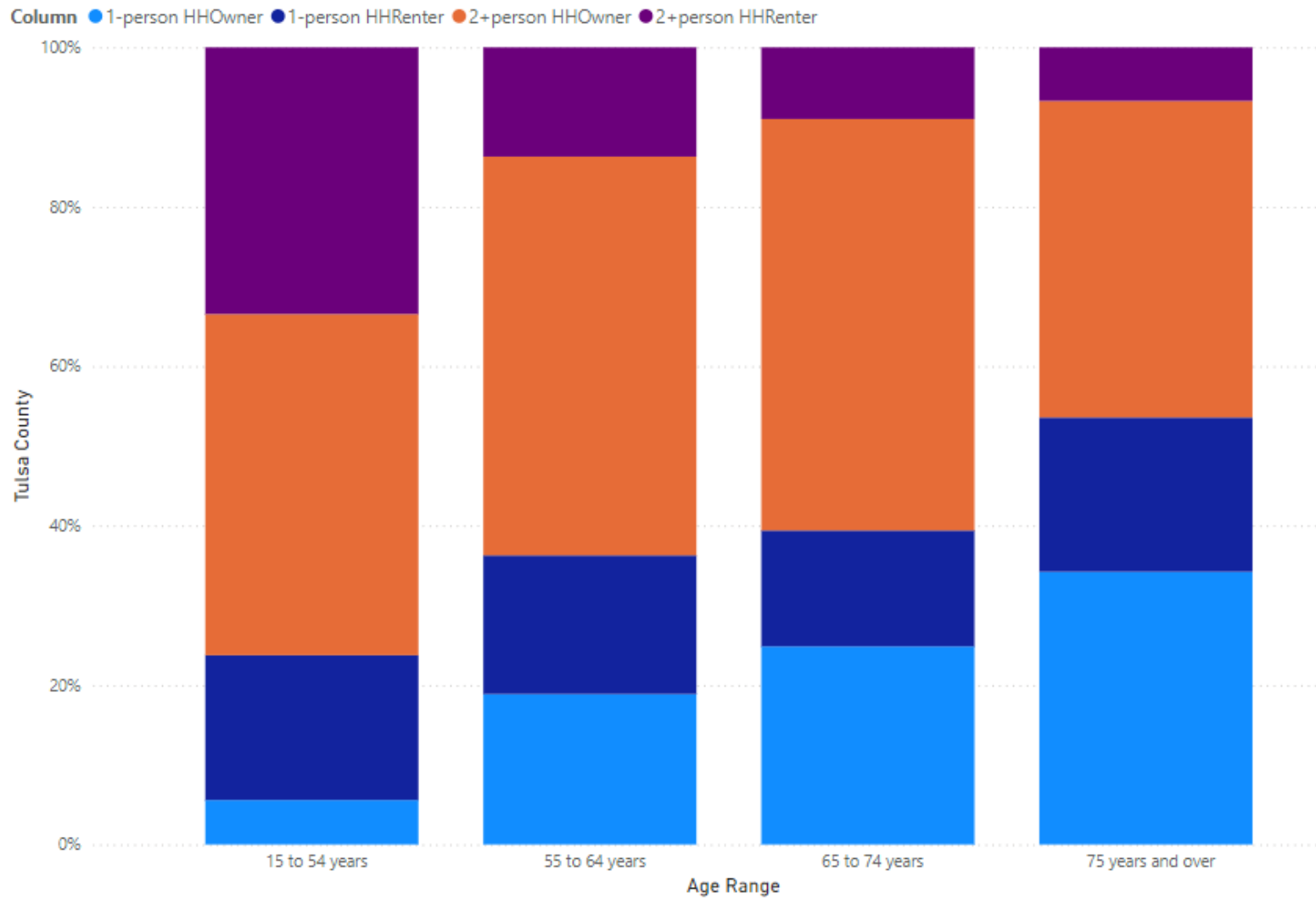


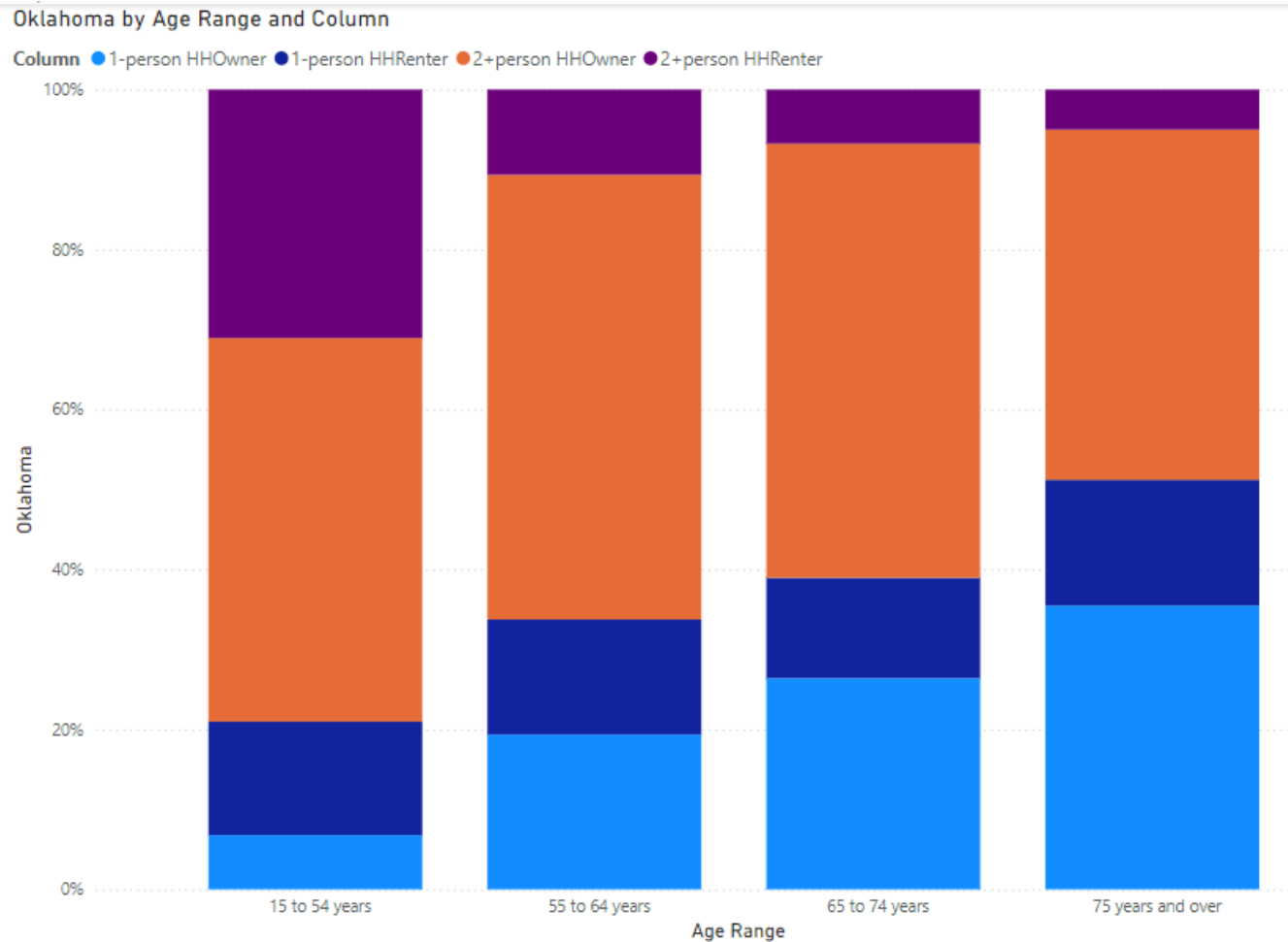
Figure 19: Tulsa County Tenure by Household Size and Age of Householder, 2023

Tulsa County by Age Range and Column



In the state as a whole, there is a similar shift in tenure and household size. Older residents are more likely to be in 1-person households with rates of homeownership increasing after 55.

Figure 20: Oklahoma Tenure by Household Size and Age of Householder, 2023



Source: American Community Survey 2023 B25116

For all jurisdictions compared, the homeownership rate has decreased since 2010 across jurisdictions, same as National and the State. Tulsa City has the lowest owner-occupied rate.

Table 19: Homeownership Rates, 2010- 2023

	2010		2020		2023	
	Owner Occupied	Renter Occupied	Owner Occupied	Renter Occupied	Owner Occupied	Renter Occupied
United States	66.60%	33.40%	64.40%	35.60%	65.20%	34.80%
Oklahoma	68.20%	31.80%	66.10%	33.90%	65.10%	34.90%
Tulsa County	62.10%	37.90%	59.50%	40.50%	58.50%	41.50%
Tulsa City	54.40%	45.60%	51.50%	48.50%	50.00%	50.00%

Source: ACS 1-YR Estimates (DP04)

Like many economic indicators, race and ethnicity appear to be correlated with homeowner status. Throughout jurisdiction, White has the highest homeowner status.

Table 20: Homeowner Status by Race/Ethnicity, 2023

	United States	Oklahoma	Tulsa County	Tulsa City
Race				
White	73.40%	75.20%	73.00%	68.30%
Black or African American	8.30%	3.90%	4.90%	7.80%
American Indian and Alaska Native	0.70%	6.00%	4.40%	3.50%
Asian	5.20%	1.90%	3.40%	3.60%
Native Hawaiian/Other Pac Islander	0.10%	0.00%	0.00%	0.10%
Some other race	4.00%	2.70%	2.90%	4.30%
Two or more races	8.30%	10.30%	11.30%	12.50%
Ethnicity				
Hispanic	11.60%	7.80%	9.20%	12.50%

Source: 2023 ACS 1-YR Estimates (S2502)

Veterans

Many communities across the country are beginning to address the unique needs that face many veterans. With the War on Terror beginning nearly 18 years ago and subsequent military enlistment/turnover figures, the number of veterans continues to grow. In jurisdiction, veterans are much more likely to have a disability than non-veterans. However, most economic indicators show that veterans are more stable than non-veterans. The median income for veterans is over 20% higher than non-veterans and both the poverty rate and unemployment rate is lower for veterans. This is likely due to the benefits of serving in the military such as the GI Bill and VA resources that are available.

Table 21: Veterans Economic Status in Tulsa City, 2023

	Veterans	Non-Veterans
Civilian population over 18 years old	18,521	295,122
Median Income	46,859	34,922
Labor force participation rate	76.20%	76.90%
Unemployment rate	4.00%	6.00%
Below poverty in the past 12 months	13.20%	17.10%
With any disability	31.50%	18.30%

Source: 2023 ACS 1-YR Estimates (S2101)

Tulsa City is home to about 11% of the total population. The median income of veterans in Tulsa City is lower than the County, State and National. The poverty rate is higher as well.

Table 22: Veterans Economic Status, Tulsa City Comparison, 2023

	United States	Oklahoma	Tulsa County	Tulsa City
Civilian population over 18 years old	15,813,955	236,525	34,776	18,521
Median Income	52,122	50,414	55,944	46,859
Labor force participation rate	77.5%	73.9%	81.9%	76.20%
Unemployment rate	3.4%	3.0%	2.3%	4.00%
Below poverty in the past 12 months	7.6%	8.9%	8.6%	13.20%
With any disability	30.9%	38.2%	28.5%	31.50%

Source: 2023 ACS 1-YR Estimates (S2101)

Housing

Characteristics of the Housing Stock

Between 2017 and 2023, the number of housing units in the City increased by approximately 4,550 units. The number of owner-occupied units grew by about 5,600 units (1.2%), while the number of renter-occupied units decreased by about 1,500 units (-1.2%). Between 2010 and 2017, the number of owner-occupied units saw a decrease while the number of renter-occupied units saw an increase. The number of vacant units decreased by -1.6% and made up 10.9% of the housing units in 2023.

Table 23: Tulsa City Housing Units, 2017- 2023					
	2017		2023		% Change from 2017-2023
	Units	% of Total	Units	% of Total	
Tenure					
Occupied Units	164,224		171,382		
Owner-occupied	83,500	50.8%	89,141	52%	1.2%
Renter-occupied	80,724	49.2%	82,241	48%	-1.2%
Vacant Units	23,477	12.5%	20,968	10.9%	-1.6%
Total Housing Units	187,801		192,350		

Source: 2013-2017 ACS (DP04), 2018-2023 ACS (DP04)

52% of the City's housing stock in 2023 was owner-occupied, which is about a 1% increase from 2017 estimates. Figure 21 shows the concentrations of owner-occupied households throughout

the City based on 2018-2022 ACS data. There are some tracts that have comparatively large concentrations of owner-occupied units. The darker purple shaded areas indicate tracts that have 85.92% or more of owner-occupied housing. These tracts tend to be towards the outer edges of the City, while the middle of the City has smaller concentrations of owner-occupied housing.

Figure 21: Tulsa Homeownership Rates, 2018- 2022

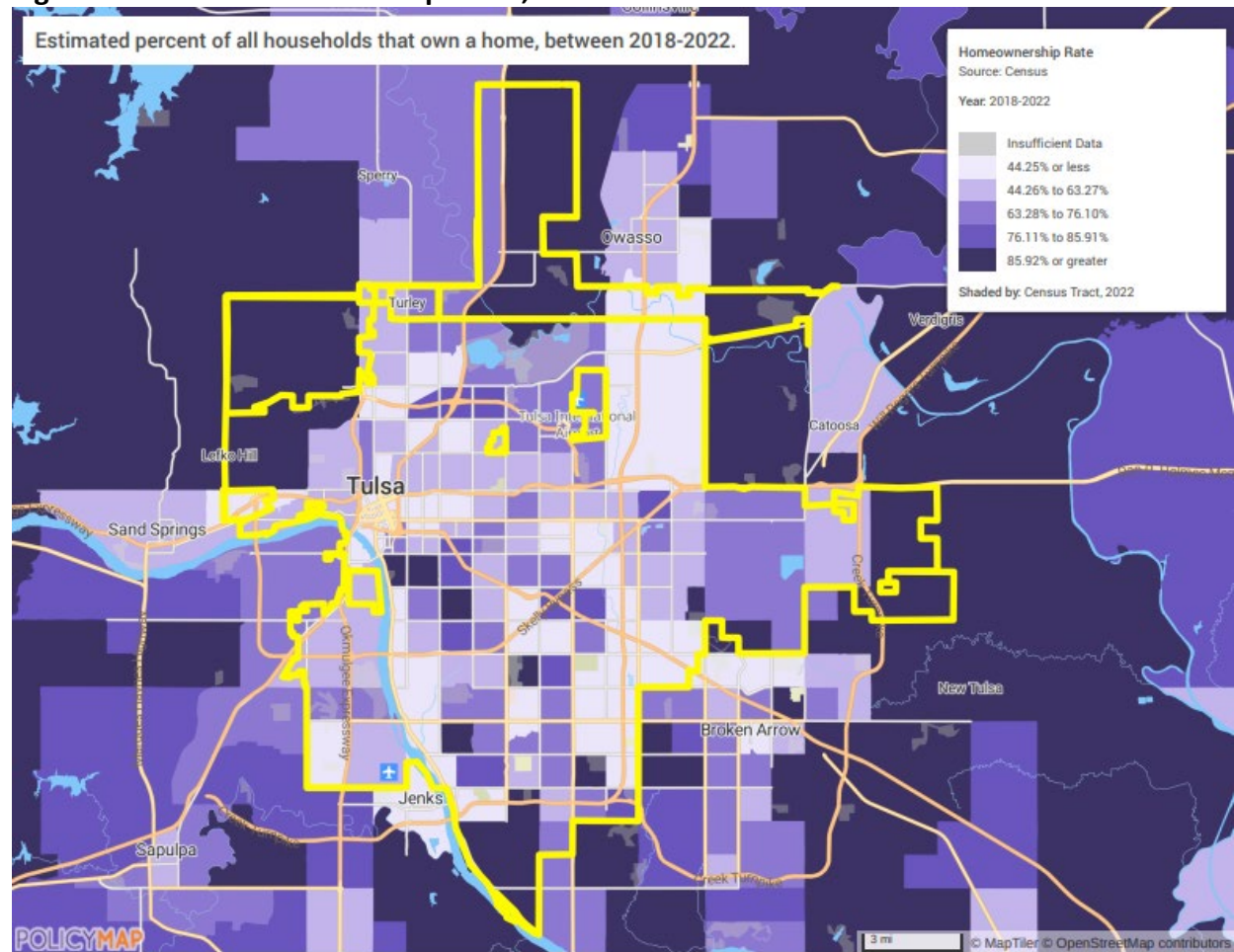
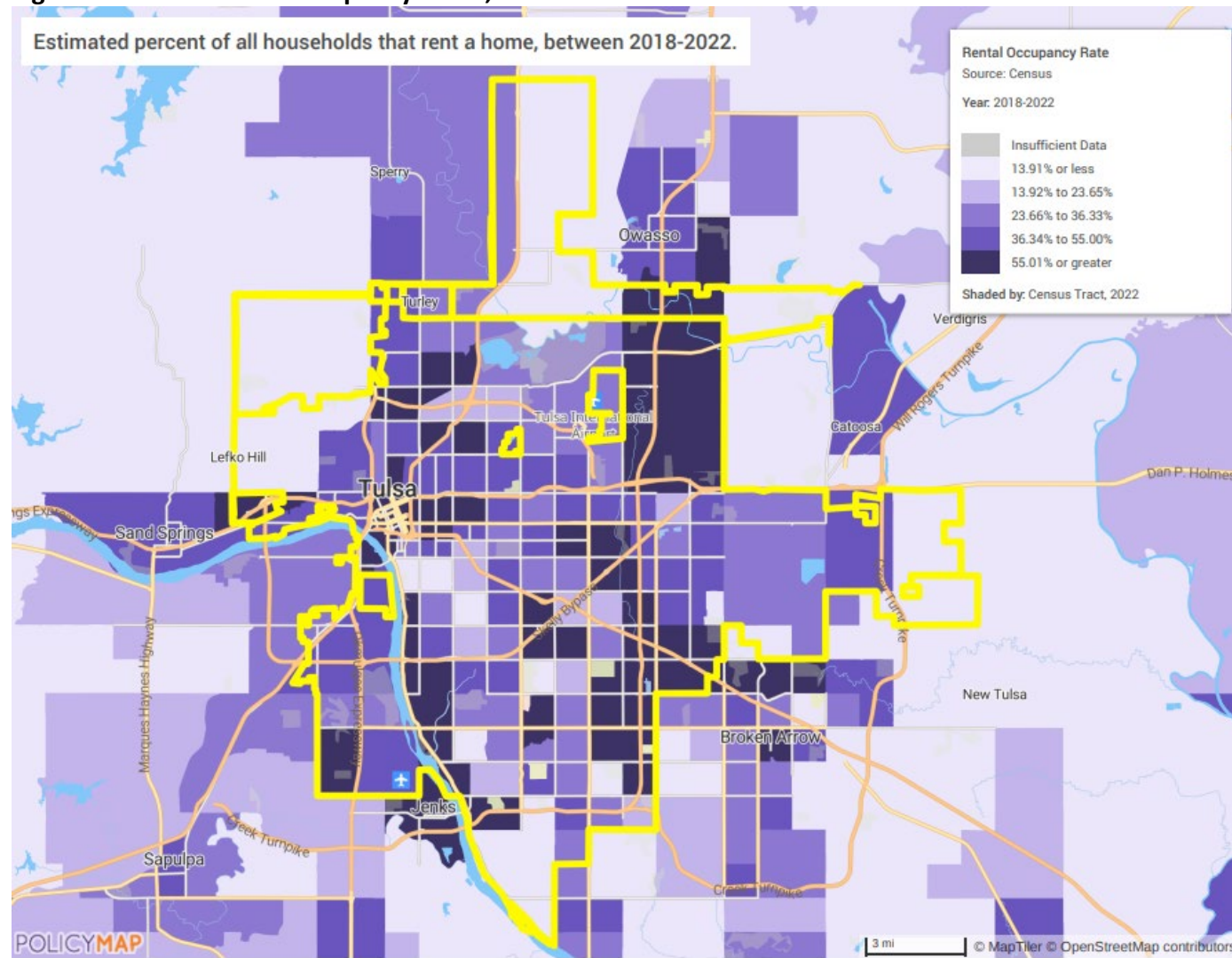


Figure 22 shows the concentration of renter-occupied households throughout the City. Renter households are spread throughout the City, with the dark purple shaded areas indicating larger concentrations of 55% or more.

Figure 22: Tulsa Rental Occupancy Rates, 2018- 2022



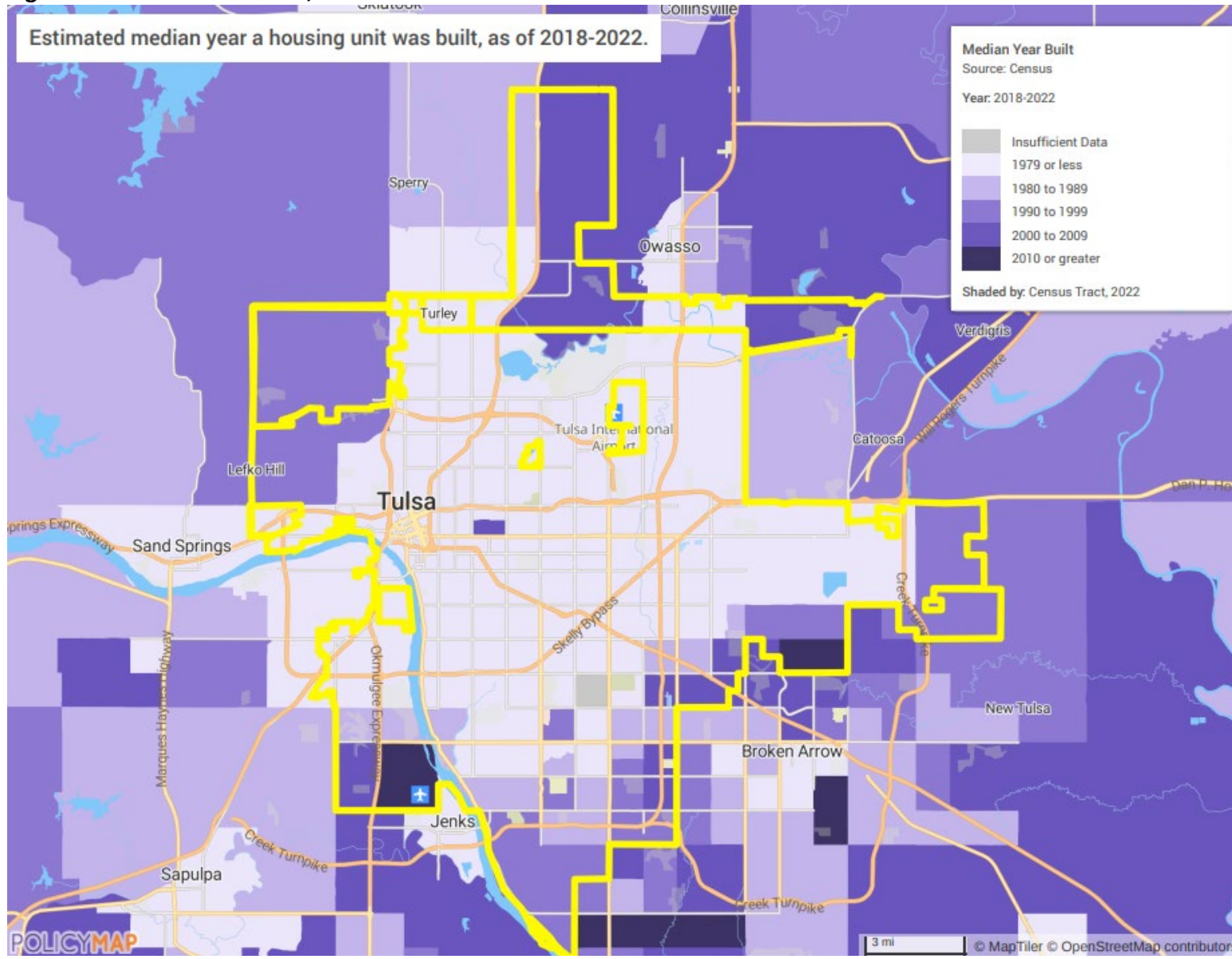
Age of Housing

Table 24 below breaks down the available housing stock in the City by the year units were built. When looking at the age of a home an important factor is whether it was built before 1980. Prior to 1980 lead-based paint was used in many homes and the presence of that paint can cause significant health problems for residents, particularly for children, the elderly, and those with compromised immune systems. In Tulsa, about 125,306 units were built prior to 1980, which is approximately 65% of the total housing stock. Seniors or those on a fixed or limited income oftentimes cannot afford to maintain their home or to make necessary safety accommodations. As costs of materials for new builds continue to rise, rehabilitation assistance for low-income families and those on fixed incomes such as seniors and those with disabilities will be an important tool in allowing them to maintain their housing and lessen the risks of homelessness.

Table 24: Year Unit Built, 2018- 2023		
Year	Estimate	Percent
2020 or later	753	0.4%
2010 to 2019	11,541	6.0%
2000 to 2009	12,518	6.5%
1990 to 1999	15,745	8.2%
1980 to 1989	26,487	13.8%
1970 to 1979	38,521	20%
1960 to 1969	27,857	14.5%
1950 to 1959	29,794	15.5%
1940 to 1949	12,018	6.2%
1939 or earlier	17,116	8.9%
Total	192,350	
Source: 2018-2023 ACS (DP04)		

Homes along the outside of the City are newer than those in the central areas of the City. The lightest shaded tracts in Figure 23 indicate areas where the median year housing units were built were 1979 or earlier.

Figure 23: Median Year Built, 2018- 2022



Construction Activity

The total number of permits issued rose sharply from 3,268 in 2018 to a peak of 5,182 in 2021, followed by a decline in 2022–2023, and a modest rise in 2024 (4,113 permits). The overall average PPU has increased steadily from \$667,344 in 2018 to \$955,923 in 2024—a 43% increase over the 7-year period.

Table 25: Residential Construction Permits Issued in Tulsa, 2018- 2024

TABLE: RESIDENTIAL CONSTRUCTION PERMITS
ISSUED IN TULSA, OK

Year	1-Unit	1-Unit	2-Units	2-Units	3-4 Units	3-4 Units	5+ Units	5+ Units	Total	Total
	#	PPU	#	PPU	#	PPU	#	PPU	#	PPU
2018	38	\$603,675	16	\$12,781	518	\$1,094	29	\$49,794	3,268	\$667,344
2019	3,138	\$684,367	24	\$1,932	16	\$1,520	870	\$115,471	4,048	\$803,290
2020	3,665	\$791,681	38	\$3,647	40	\$3,875	738	\$70,280	4,481	\$869,483
2021	4,734	\$944,839	46	\$7,512	0	\$4,236	802	\$27,797	5,582	\$984,384
2022	3,620	\$943,565	38	\$4,927	21	\$2,447	1,223	\$126,177	4,902	\$1,077,116
2023	3,219	\$792,912	82	\$10,813	40	\$9,023	1,463	\$155,911	4,804	\$968,659
2024	3,429	\$850,561	80	\$10,490	10	\$1,561	594	\$93,311	4,113	\$955,923

SOURCE: US CENSUS BUREAU, BUILDING PERMITS SURVEY
PPU=PRICE PER UNIT

Figure 24 below illustrates the total number of residential construction permits issued in Tulsa between 2018 and 2024. The data is broken down by overall permits, 1-unit permits, and 5+ unit permits. There was a sharp rise in total permits from 2018, reaching a peak in 2021 with over 5,000 permits, largely driven by an increase in single-unit homes. Following this peak, there's a notable dip in 2023. Interestingly, 5+ unit permits, which reflect multifamily developments, show significant growth beginning in 2019, peaking in 2023 with 1,463 permits. This indicates a growing trend toward higher-density residential development, likely due to increasing demand for affordable and rental housing. Despite some fluctuations, 1-unit permits remain a dominant share of the total, indicating consistent demand for single-family homes.

Figure 24: Residential Construction Permits in Tulsa, 2018-2024

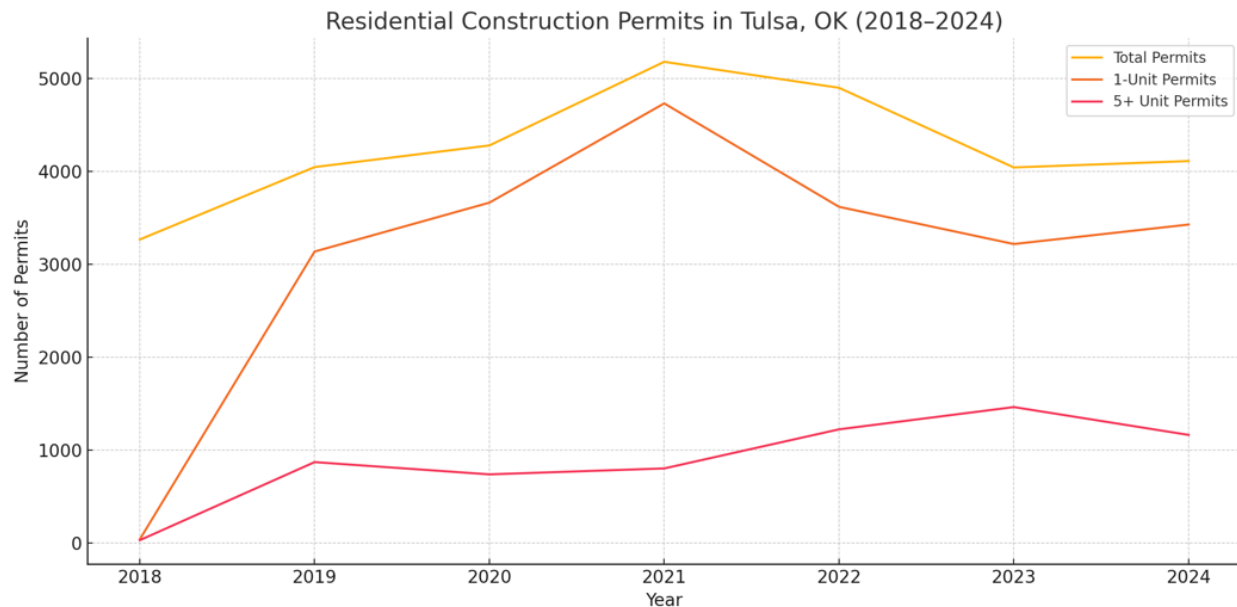
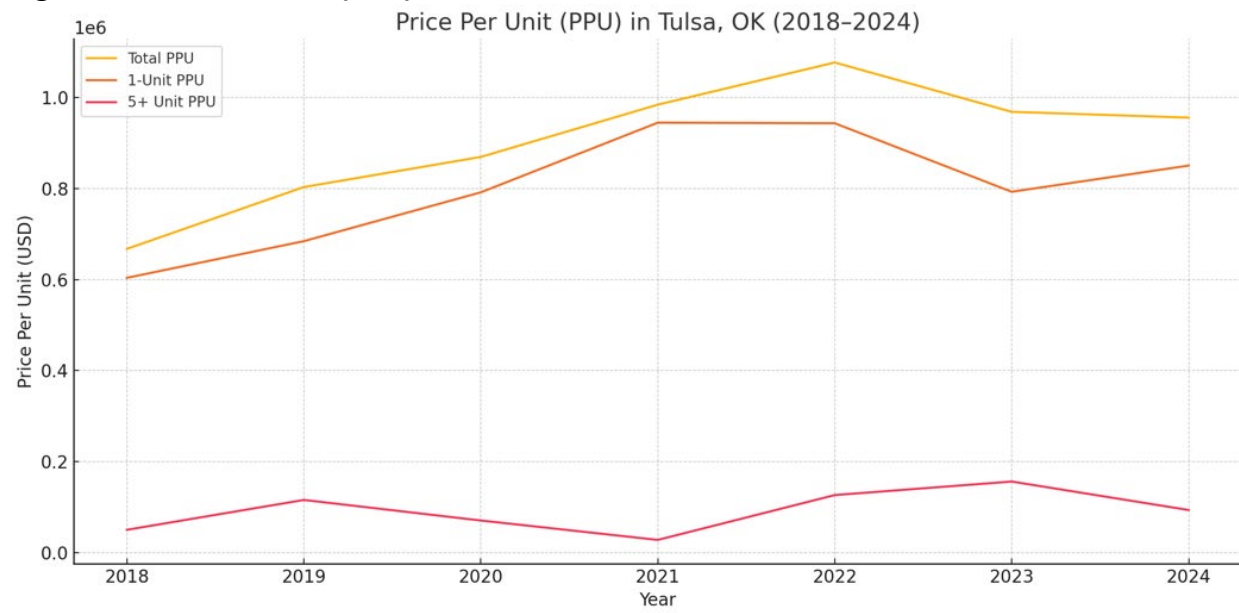


Figure 25 below tracks the average Price Per Unit (PPU) across all permits, with specific attention to 1-unit and 5+ unit structures. The most prominent trend is a steady and consistent increase in PPU, especially for 1-unit homes, which rose from \$603,675 in 2018 to \$850,561 in 2024. This reflects both the rising costs of materials and labor, as well as possible shifts in the types of homes being built. For 5+ unit developments, PPU is significantly lower. The PPU jumped to \$155,911 in 2023, suggesting a boom in higher-end multifamily construction or more amenities per unit. However, in 2024, it dipped to \$93,311, possibly indicating a shift back to more affordable multifamily housing.

Figure 25: Price Per Unit (PPU) in Tulsa, 2018- 2024



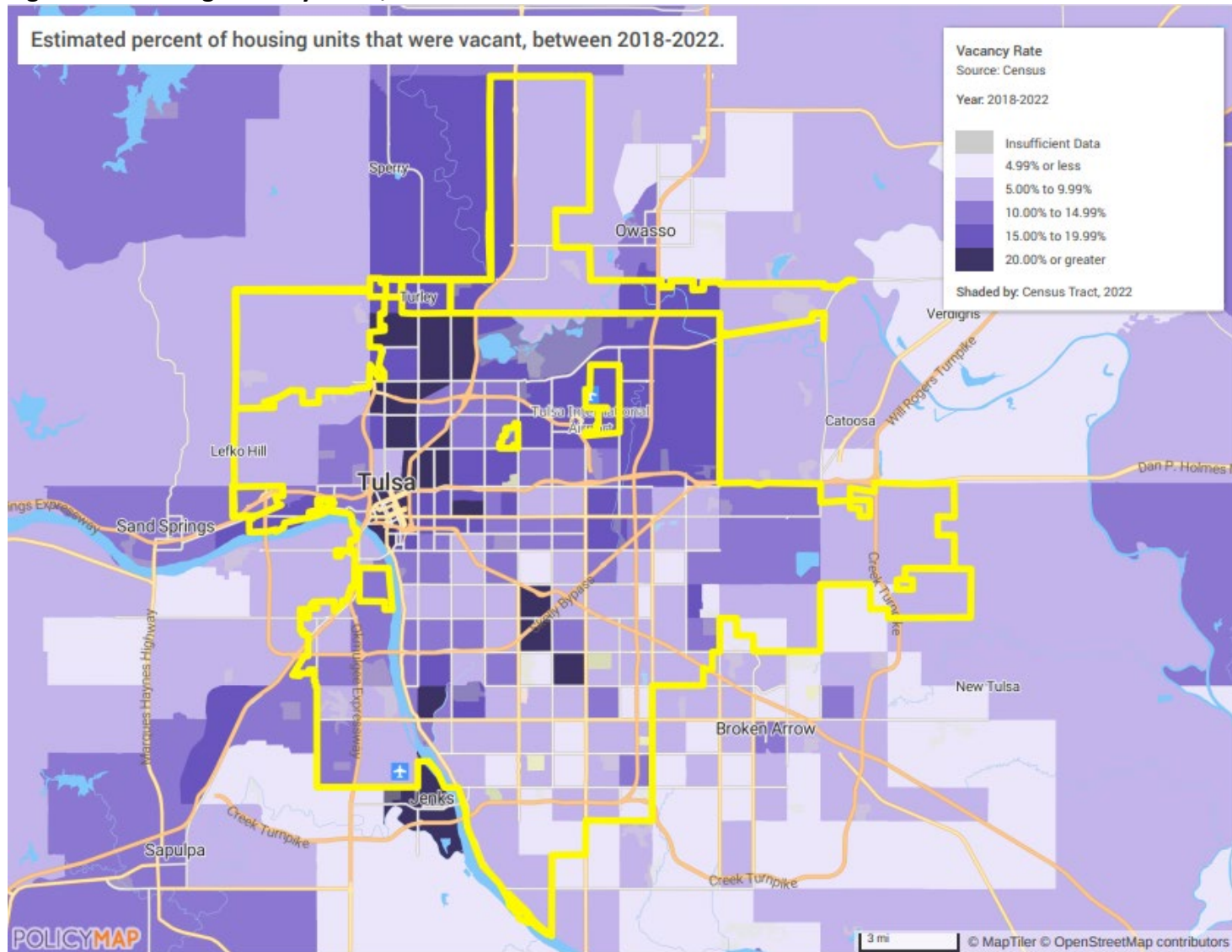
Vacant Housing

The number of vacant units in the City decreased by about 1,800 units between 2017 and 2023. The percentage of vacant “for rent” units decreased by –7.4%, while the percentage of vacant “rented, not occupied” units increased by 2.5%. Vacant “for sale only” and “sold, not occupied” units also saw a decrease between 2017 and 2023. Units for migrant workers had a very small decline at –0.1%. “Other vacant” units make up approximately 50% of the vacant housing units in the City and increased by nearly 11% between 2017 and 2023.

Table 26: Vacant Housing Units, 2017- 2023					
Tenure	2017		2023		% Change from 2017-2023
	Units	% of Total	Units	% of Total	
For rent	7,881	34.6%	5,692	27.2%	-7.4%
Rented, not occupied	1,082	4.8%	1,531	7.3%	2.5%
For sale only	2,183	9.6%	1,078	5.1%	-4.5%
Sold, not occupied	1,583	7%	1,071	5.1%	-1.9%
For seasonal, recreational, or occasional use	1,105	4.9%	1,109	5.3%	0.4%
For migrant workers	39	0.2%	30	0.1%	-0.1%
Other vacant	8,901	39.1%	10,457	49.9%	10.8%
Total	22,774		20,968		
Source: Source: 2013-2017 ACS (B25004), 2019-2023 ACS (B25004)					

Figure 27 shows the concentration of vacant housing units throughout the City. The darker shaded areas indicate areas where 20% or more housing units are vacant. There are smaller concentrations of vacant housing units in the southern areas of the City.

Figure 27: Housing Vacancy Rates, 2018- 2022



Household Size

The number of occupied housing units increased between 2017 and 2023. However, the average person per household did not see significant changes. Both 1-person households and 2-person households saw increases of less than 1% and both 3-person households and 4-or-more-person households saw decreases of less than 1%.

Table 27: Household Size, 2017- 2023					
Number of Persons	2017		2023		% Change 2017 - 2023
	Estimate	Percent	Estimate	Percent	
Occupied Housing Units	164,381		171,382		
1-person household	57,786	35.2%	61,450	35.9%	0.7%
2-person household	52,935	32.2%	54,661	31.9%	0.3%
3-person household	22,537	13.7%	22,982	13.4%	-0.3%
4-or-more-person household	31,123	18.9%%	32,289	18.8%	-0.1%
Source: 2013-2017 ACS (S2501), 2019-2023 ACS (S2501)					

Between 2017 and 2023, the only property type that saw an increase was those with 20 or more units, which grew by 1.4%. All other property types saw decreases of less than 1%, other than the category including boats, RV's, vans, etc. – this property type did not increase or decrease.

Table 28: Properties by Type, 2017- 2023					
Type	2017		2023		% Change 2017-2023
	Estimate	Percent	Estimate	Percent	
1-unit, detached	116,578	62.3%	119,509	62.1%	-0.2%
1-unit, attached	6,240	3.3%	5,921	3.1%	-0.2%
2 units	3,743	2.0%	3,705	1.9%	-0.1%
3 or 4 units	9,008	4.8%	8,721	4.5%	-0.3%
5 to 9 units	13,778	7.4%	13,883	7.2%	-0.2%
10 to 19 units	17,011	9.1%	16,802	8.7%	-0.4%
20 or more units	17,840	9.5%	20,949	10.9%	1.4%
Mobile home	2,778	1.5%	2,612	1.4%	-0.1%
Boat, RV, van, etc.	179	0.1%	248	0.1%	0%
Total Housing Units	187,155		192,350		
Source: 2013-2017 ACS (DP04), 2019-2023 ACS (DP04)					

Housing Problems

A housing unit is considered to be overcrowded if there is more than one occupant per room, and is considered severely overcrowded if there are 1.5 or more occupants per room. Overcrowding and severe overcrowding are not significant problems in Tulsa and the average number of occupants per room did not change much between 2017 and 2023. Units with 1.51 or more occupants per room did increase by 0.3%, while units with 1 or less occupants per room decreased by -0.2%. About 3.5% of housing units in the City experienced overcrowding in 2023, which is a 0.3% increase from 2017.

Table 29: Overcrowding and Severe Overcrowding, 2017- 2023					
Occupants Per Room	2017		2023		% Change 2017 - 2023
	Estimate	Percent	Estimate	Percent	
Occupied Housing Units	164,381		171,382		
1.00 or less	159,166	96.8%	165,483	96.6%	-0.2%
1.01 to 1.50	3,879	2.4%	4,085	2.4%	0%
1.51 or more	1,336	0.8%	1,814	1.1%	0.3%
Source: 2013-2017 ACS (DP04), 2019-2023 ACS (DP04)					

Lacking complete plumbing or kitchen facilities or telephone services are considered housing problems. These housing problems are not significant issues in the City. While lacking complete plumbing or kitchen facilities both saw very slight increases between 2017 and 2023, only less than 1% of housing units experience each of these housing problems. Housing units with no telephone service available decreased by -2% between 2017 and 2023 and now affects only 1.1% of housing units.

Table 30: Selected Housing Characteristics, 2017- 2023					
Housing Problem	2017		2023		% Change 2017 - 2023
	Estimate	Percent	Estimate	Percent	
Occupied housing units	164,381		171,382		
Lacking complete plumbing facilities	434	0.3%	601	0.4%	0.1%
Lacking complete kitchen facilities	1,144	0.7%	1,461	0.9%	0.2%
No telephone service available	5,053	3.1%	1,901	1.1%	-2%
Source: 2013-2017 ACS (DP04), 2019-2023 ACS (DP04)					

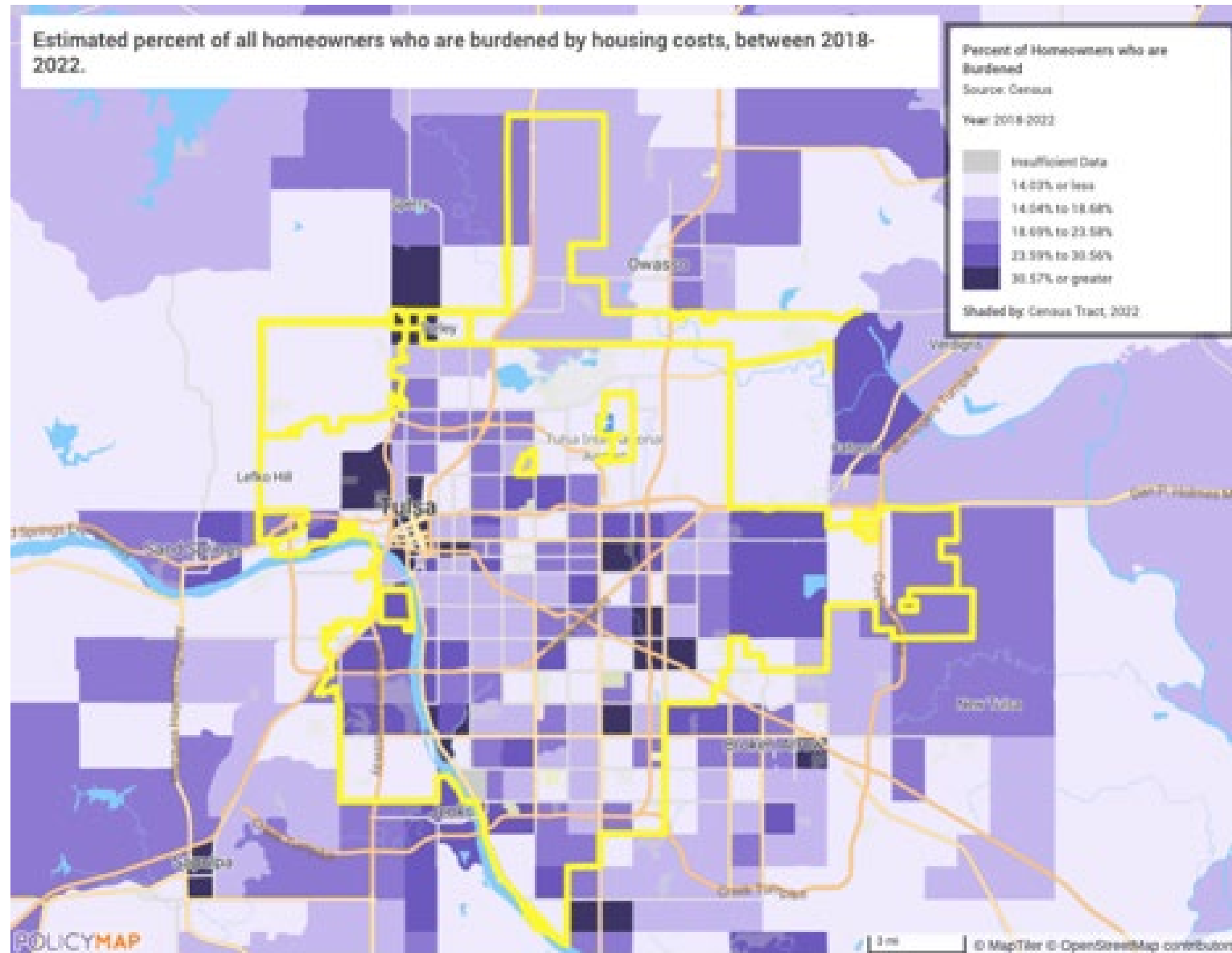
The most common housing problem in Tulsa is cost burden. When a household spends more than 30% of their income on housing costs, they are considered cost burdened. 25.5% of owner-occupied housing units with a mortgage were cost burdened in 2023, which is a -0.4% decrease from 2017. 19.1% of owner-occupied units in 2023 were paying 35% or more of their income on housing costs.

Table 31: Selected Monthly Housing Costs of Owners with a Mortgage, 2017- 2023					
Percentage of Household Income	2017		2023		% Change 2017 - 2023
	Estimate	Percent	Estimate	Percent	
Less than 20.0 percent	24,794	49.1%	25,483	51.4%	2.3%
20.0 to 24.9 percent	7,525	14.9%	6,806	13.7%	-1.2%
25.0 to 29.9 percent	5,116	10.1%	4,582	9.2%	-0.9%
30.0 to 34.9 percent	3,122	6.2%	3,191	6.4%	0.2%
35.0 percent or more	9,980	19.7%	9,487	19.1%	-0.6%
Total housing units with a mortgage	50,537		49,549		
Not computed	233		355		
Source: 2013-2017 ACS (DP04), 2019-2023 ACS (DP04)					

When owner-occupied units do not have a mortgage, the rate of cost burden decreases. 11.7% of owner-occupied units without a mortgage were cost burdened in 2023, which is a -0.7% decrease from 2017. Figure 28 shows the percentages of cost-burdened homeowners throughout the City. The darker purple areas indicate tracts where there are higher concentrations of cost-burdened homeowners.

Table 32: Selected Monthly Housing Costs of Owners without a Mortgage, 2017- 2023					
Percentage of Household Income	2017		2023		% Change 2017 - 2023
	Estimate	Percent	Estimate	Percent	
Less than 10.0 percent	15,008	45.8%	17,451	45.5%	-0.3%
10.0 to 14.9 percent	6,328	19.3%	7,785	20.3%	1%
15.0 to 19.9 percent	3,839	11.7%	4,386	11.4%	-0.3%
20.0 to 24.9 percent	2,238	6.8%	2,476	6.5%	-0.3%
25.0 to 29.9 percent	1,331	4.1%	1,800	4.7%	0.6%
30.0 to 34.9 percent	1,047	3.2%	875	2.3%	-0.9%
35.0 percent or more	3,008	9.2%	3,611	9.4%	0.2%
Total housing units without a mortgage	32,799		38,384		
Not computed	439		853		
Source: 2013-2017 ACS (DP04), 2019-2023 ACS (DP04)					

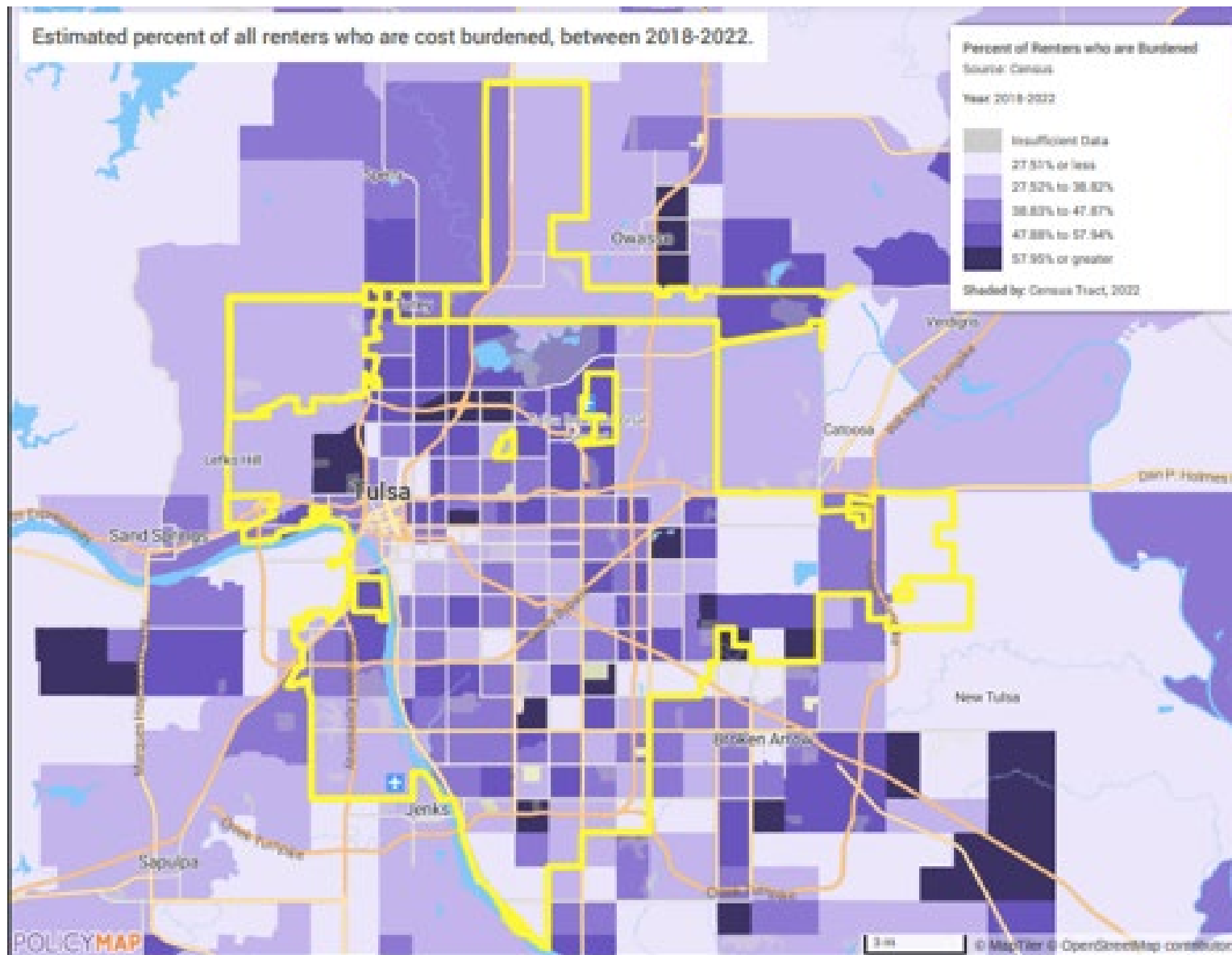
Figure 28: Percent of Homeowners who are Cost Burdened, 2018- 2022



Renter households are significantly more impacted by cost burden than homeowner households. In 2023, 47.3% of renter households experienced cost burden, which is a 0.8% increase from 2017. As shown in Table 33, 38.4% of renter households were paying 35% or more of their income toward housing costs in 2023. Figure 29 shows the percentage of cost-burdened renters throughout the City. The darker purple areas indicate higher concentrations of cost-burdened renters.

Table 33: Selected Monthly Housing Costs of Renters, 2017- 2023					
Percentage of Household Income	2017		2023		% Change 2017 - 2023
	Estimate	Percent	Estimate	Percent	
Less than 15.0 percent	10,910	14.6%	11,624	15.2%	0.6%
15.0 to 19.9%	10,364	13.8%	10,014	13.1%	-0.7%
20.0 to 24.9 percent	10,339	13.8%	10,041	13.1%	-0.7%
25.0 to 29.9 percent	8,401	11.2%	8,659	11.3%	-0.1%
30.0 to 34.9 percent	5,901	7.9%	6,778	8.9%	1%
35.0 percent or more	28,926	38.6%	29,412	38.4%	-0.2%
Total housing units without a mortgage	74,841		76,528		
Not computed	5,532		5,713		
Source: 2013-2017 ACS (DP04), 2019-2023 ACS (DP04)					

Figure 29: Percent of Renters who are Cost Burdened, 2018- 2022



Housing Costs

Both the median home value and the median contract rent increased significantly between 2017 and 2023. The median home value increased by 47% and was at \$189,600 by 2023, and the median contract rent increased by 27.3% and was at \$998 by 2023. The number of owner-occupied units increased by 6.1% between 2017 and 2023, while the number of renter-occupied units increased by 2.3%. Figure 30 shows the change in median home values between 2017 and 2022, with the darker purple shaded tracts indicating larger increases, while Figure 31 shows the changes in the median rent prices.

Table 34: Median Housing Costs, 2017- 2023			
	2017	2023	% Change 2017 - 2023
Owner Occupied Units	84,008	89,141	6.1%
Median Home Value (dollars)	\$129,000	\$189,600	47%
Renter Occupied Units	80,373	82,241	2.3%
Median Contract Rent (dollars)	\$784	\$998	27.3%
Source: 2013-2017 ACS (DP04), 2019-2023 ACS (DP04)			

Figure 30: Percent Change in Median Home Value Between 2013- 2017 and 2018- 2022

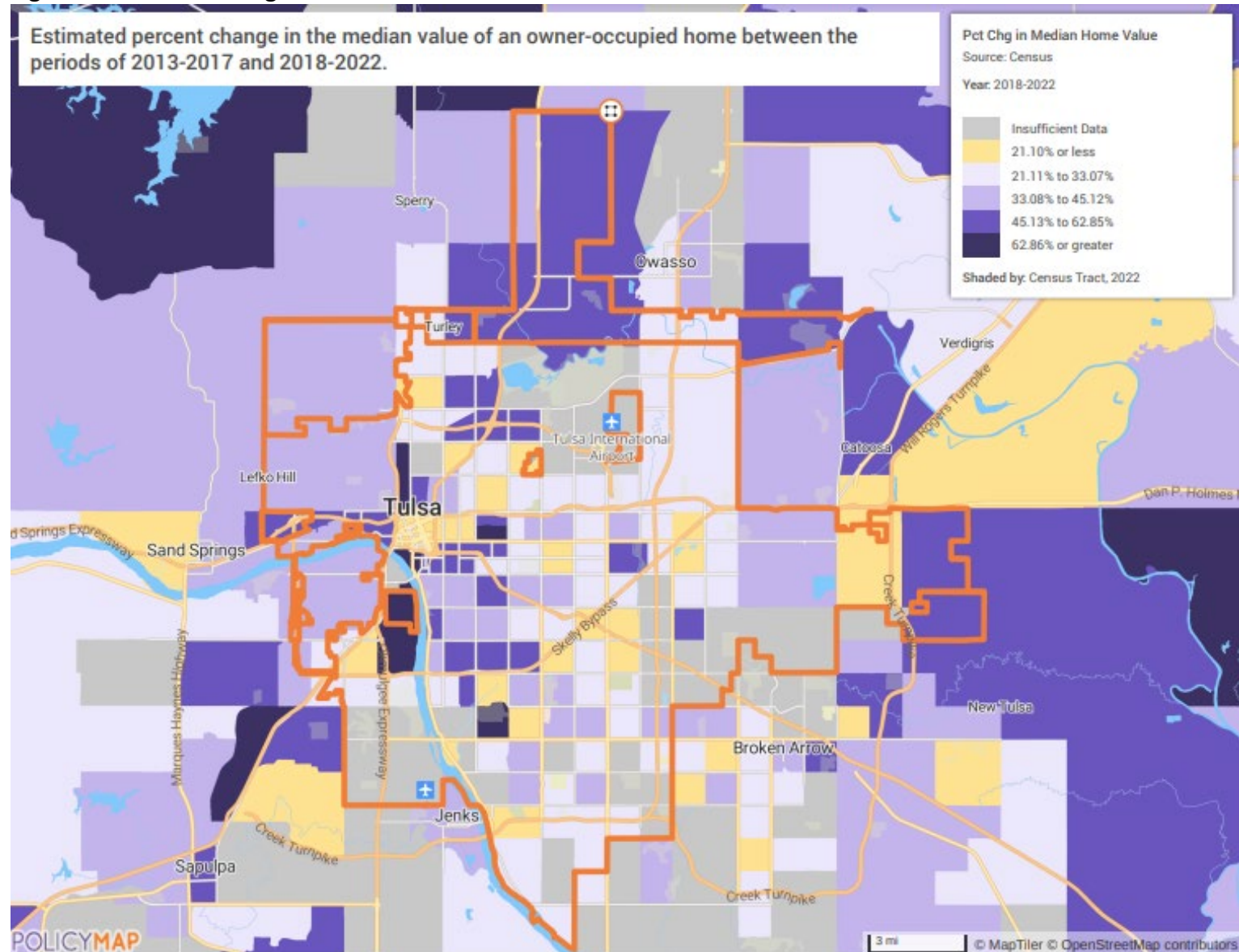
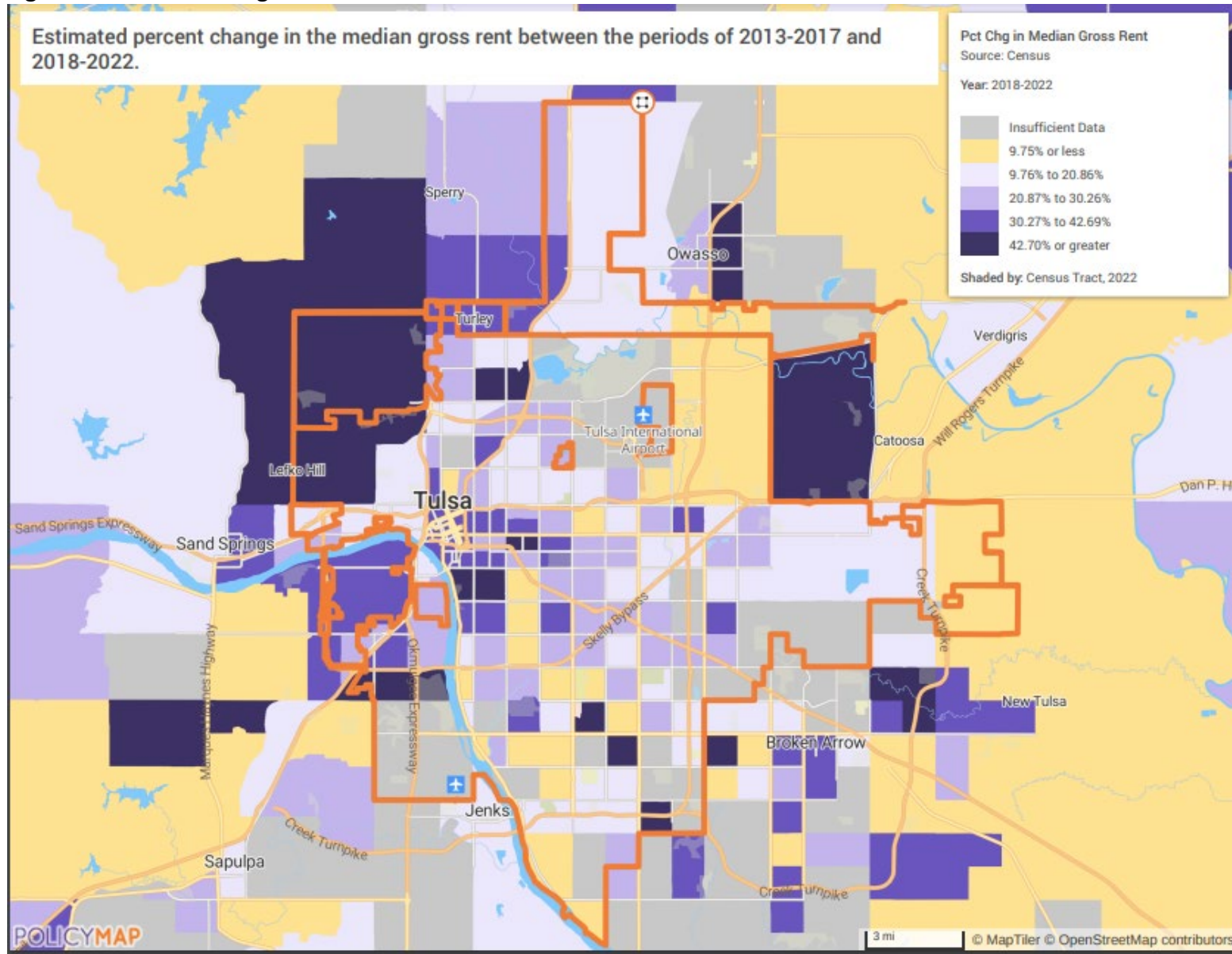


Figure 31: Percent Change in Median Gross Rent Between 2013- 2017 and 2018- 2022



SECTION IV. SOCIO-ECONOMIC CONTEXT

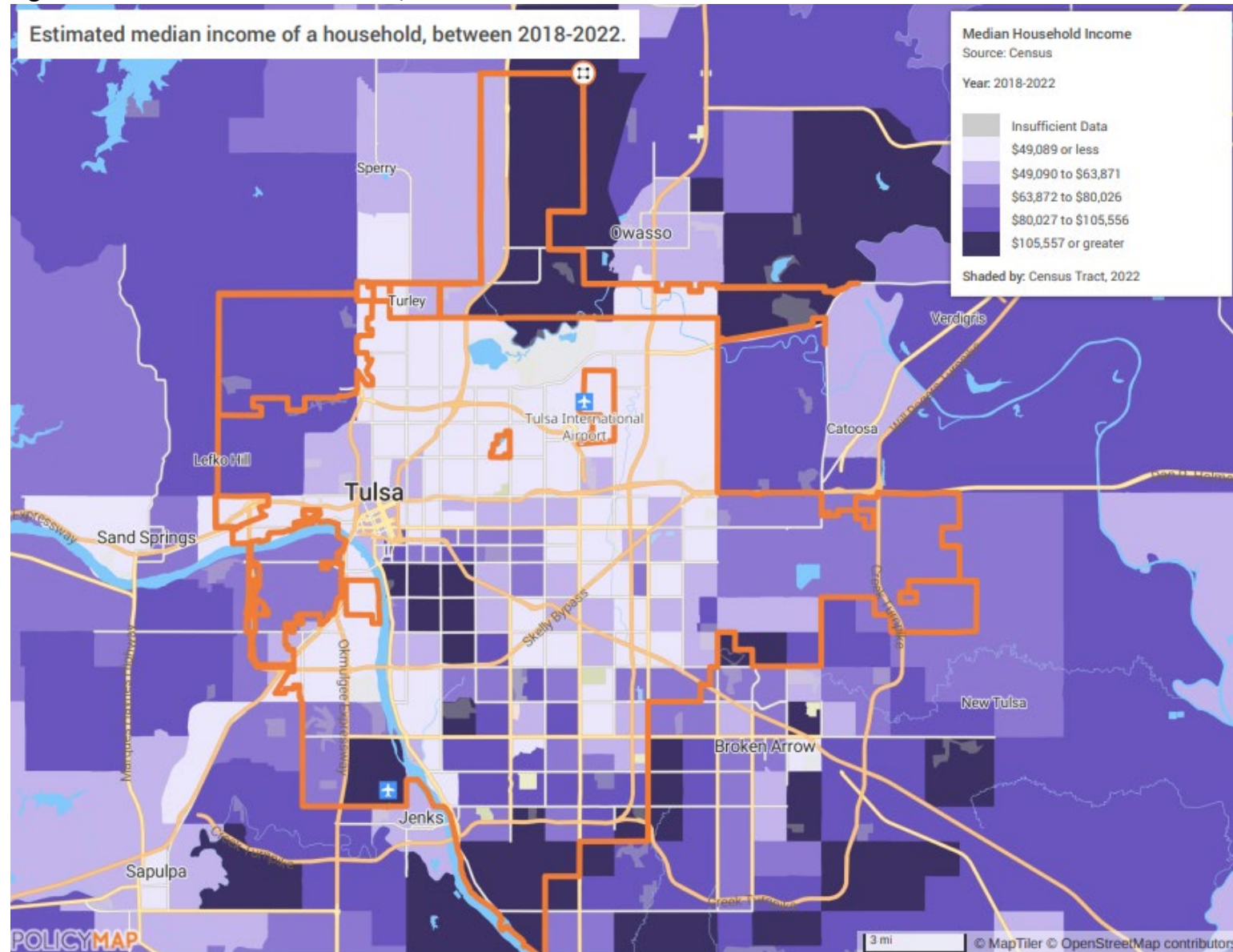
This section of the analysis provides demographic, economic, and housing information about the City of Tulsa. Sources for this data include the U.S. Census Bureau's American Community Survey and Building Permits Survey, the Bureau of Economic Analysis, the Bureau of Labor Statistics, the 2018 Gallup-Tulsa Citivoice Index Results, and other sources. A wide range of socio-economic characteristics were analyzed. When possible, this data was mapped at the Census Tract level to allow for further analysis based on geography. Evaluating the differences between parts of the City is vital to preventing and addressing any concentrated populations or segregation, particularly when the defining factor is economic, racial, or ethnic. The purpose of this section is to provide an understanding of the conditions in Tulsa in order to allow for the development of meaningful and realistic solutions.

Household Income

Between 2017 and 2023, there have been increases in all income groups earning \$50,000 or more, while there has been a decrease in income groups earning less than \$50,000. While the number of higher income earning groups has increased in the City, there are still a significant number of households earning lower incomes. The lighter colored tracts in Figure 40 below indicate tracts where the median income is less than \$50,000. The central areas of the City have higher concentrations of lower income earning households.

Table 40: Households by Income, 2017- 2023					
Income	2017		2023		% Change 2017-2023
	Households	Percent	Households	Percent	
Less than \$10,000	15,499	9.4%	12,898	8.3%	-1.1%
\$10,000 to \$14,999	9,537	5.8%	7,574	5.1%	-0.7%
\$15,000 to \$24,999	20,542	12.5%	12,968	7.8%	-4.7%
\$25,000 to \$34,900	19,081	11.6%	17,265	9.2%	-2.4%
\$35,000 to \$49,999	25,485	15.5%	23,087	13.9%	-1.6%
\$50,000 to \$74,999	29,356	17.9%	30,543	18.5%	0.6%
\$75,000 to \$99,000	15,252	9.3%	19,666	11.6%	2.3%
\$100,000 to \$149,999	15,561	9.5%	23,046	12.4%	2.9%
\$150,000 to \$199,999	6,342	3.9%	10,404	5.6%	1.7%
\$200,000 or more	7,726	4.7%	13,931	7.7%	3%
Total	164,381		171,382		
Source: 2013-2017 ACS (DP03), 2019-2023 ACS (DP03)					

Figure 40: Estimated Median Income, 2018- 2022



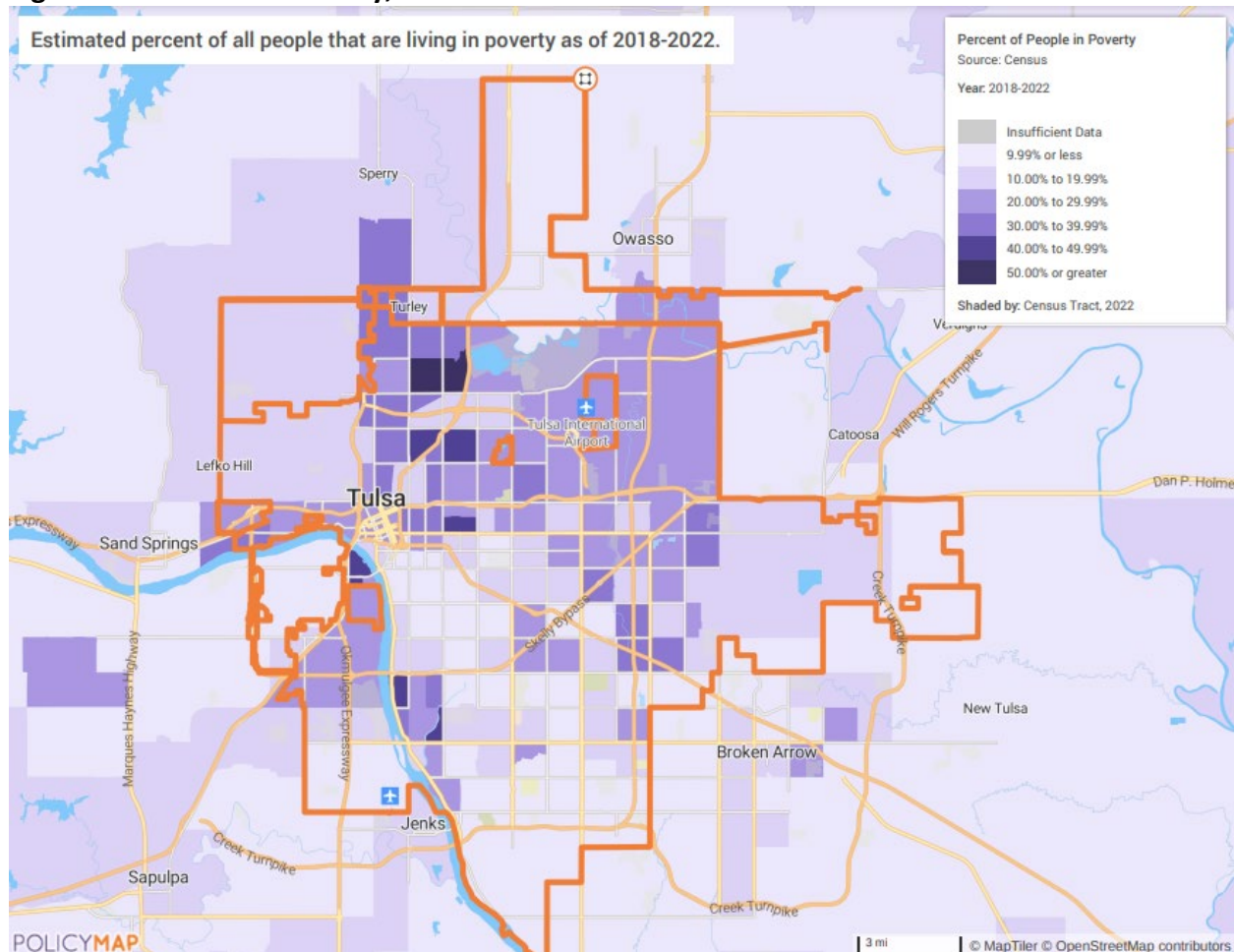
HUD defines households as extremely low-income when they are earning 30% or less than the AMI, and very low-income households as earning less than 50% of the AMI. Table 41 below shows the tracts in the City that are extremely low-income and very low-income.

Table 41: Local Median Household Income as a share of Area Median Household Income, 2018- 2022		
Census Tract	Area Median Household Income Group	Median Household Income %
40143002100	Extremely Low-Income	26.6%
40143001000	Extremely Low-Income	30.4%
40143008001	Very Low-Income	32.8%
40143000500	Very Low-Income	38.7%
40143006200	Very Low-Income	41.7%
40143009011	Very Low-Income	45.0%
40143004600	Very Low-Income	47.0%
40143009008	Very Low-Income	48.4%
40143007311	Very Low-Income	49.0%
40143007608	Very Low-Income	49.0%
Source: 2018-2022 ACS		

Poverty

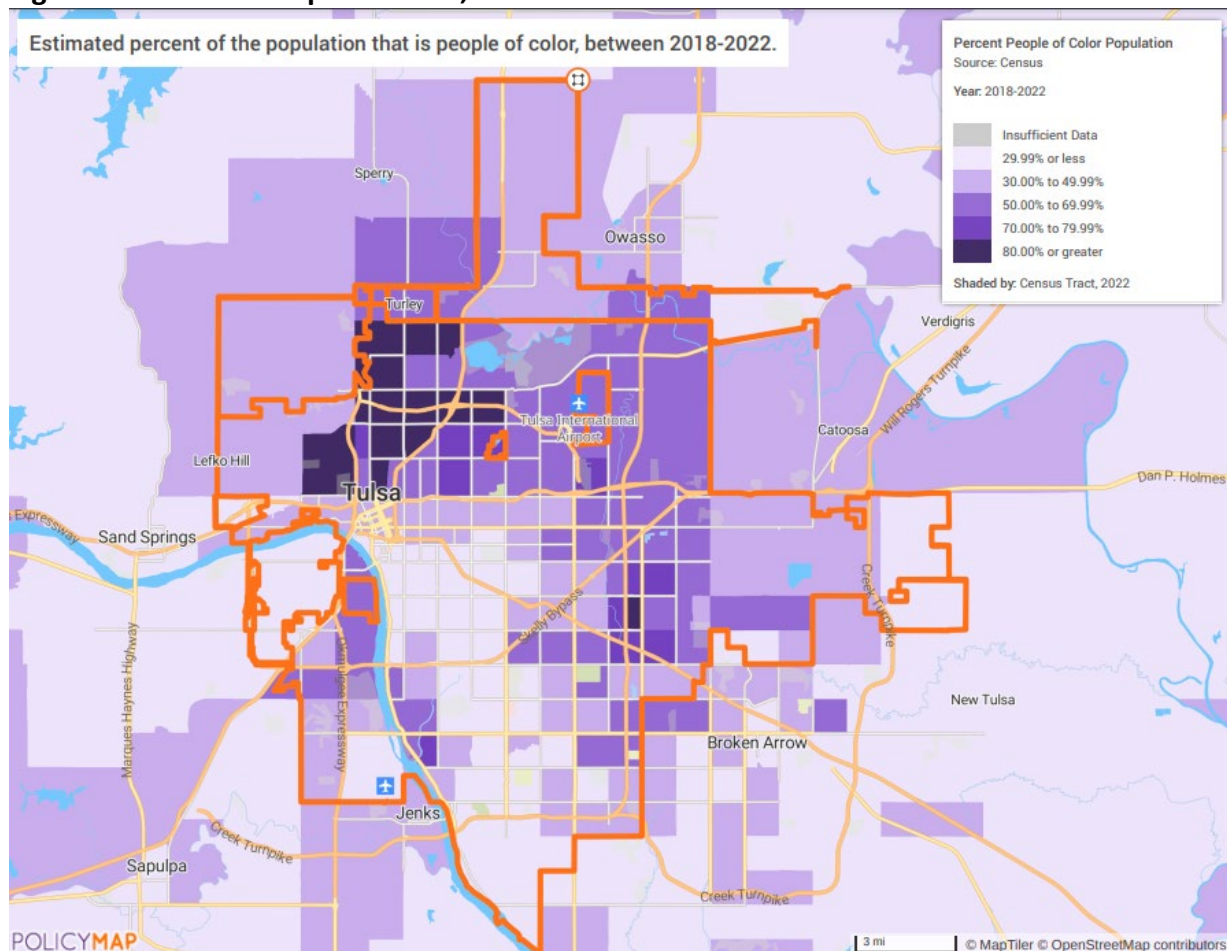
The Census Bureau uses income thresholds that vary by family size and composition to determine whether that family is in poverty or not. If a family's household income is below the threshold, then every member of the household is considered to be in poverty. Between 2017 and 2023, the poverty rate in the City increased by 9.6%. The only age group that saw an increase was those under 18 years old, which is the age group with the highest rate of poverty (27%). The age ranges of 18 to 64 years and those aged 65 years or older saw decreases in poverty rate. The map in Figure 41 below shows that the northwest area of the City has the largest concentrations of poverty, with some tracts having a poverty rate of 50% or more.

Figure 41: Percent in Poverty, 2018- 2022



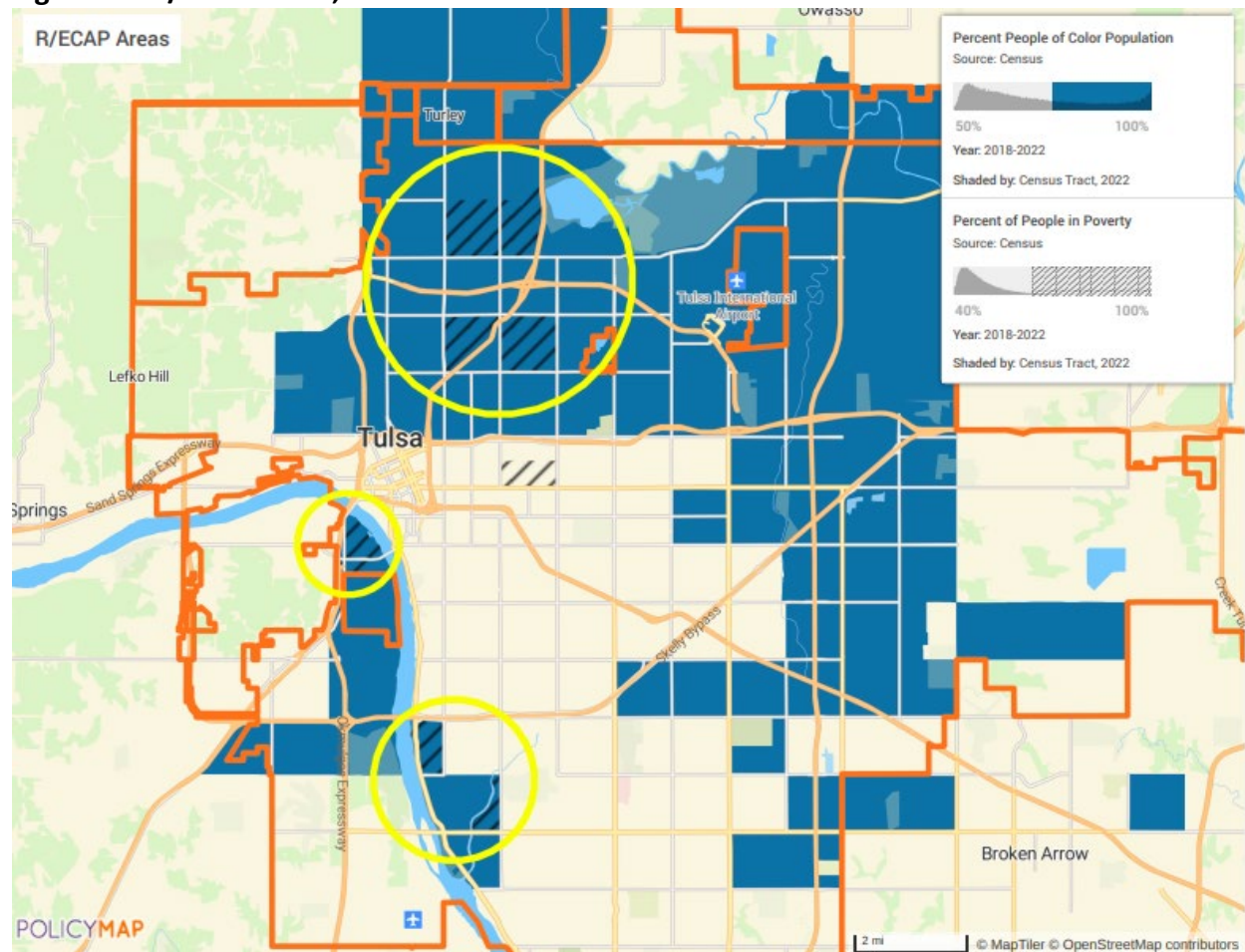
The non-white population in Tulsa in 2022 was about 47% of the total population, which is about a 7% increase since 2017. The map in Figure 42 below shows that northwestern tracts have higher concentrations of minority residents than other areas of the City. The darkest shaded areas highlight the areas where minority concentration is over 80%.

Figure 42: Percent People of Color, 2018- 2022



To assist communities in identifying racially/ethnically concentrated areas of poverty (R/ECAPS), HUD has developed a definition that involves a racial/ethnic concentration threshold and a poverty test. R/ECAPS must have a non-white population of 50% or more and census tracts must have 40% or more of people living in poverty. The map in Figure 43 below highlights the R/ECAP areas in Tulsa. These areas are shaded in blue with diagonal lines overlaying the area.

Figure 43: R/ECAP Areas, 2022



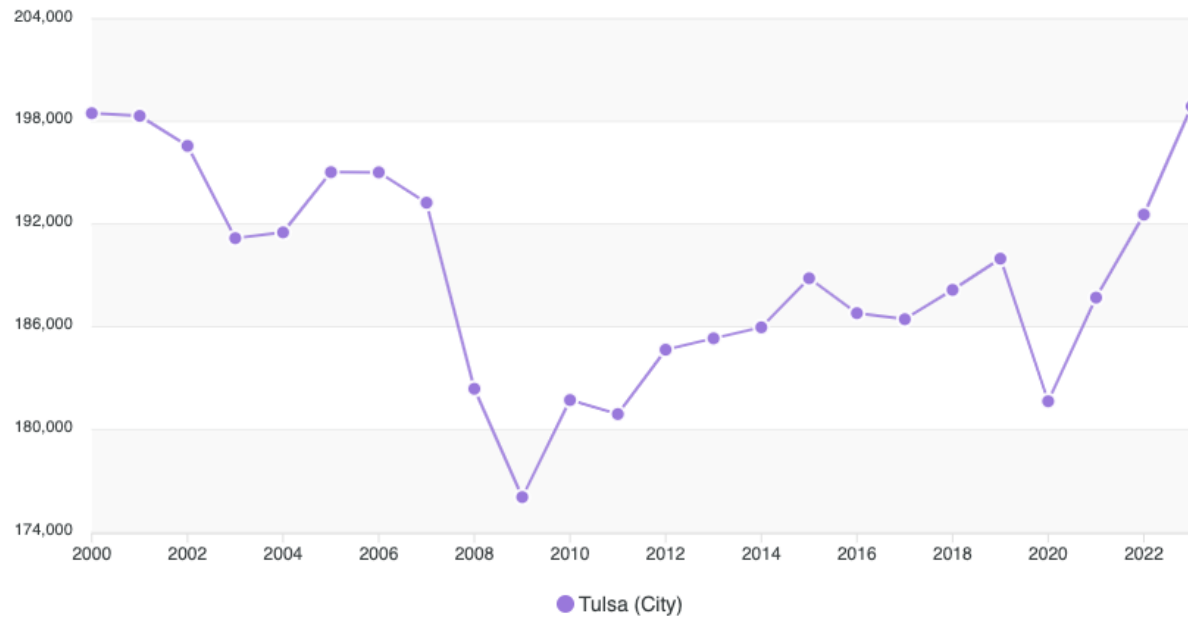
Labor Force and Employment

The trends of employment rates and the number of people employed have trended fairly the same between 2000 and 2022. There was a large dip in the number of people employed in 2020 but has been steadily increasing since then. The number of people in the labor force did not have as drastic of a decrease in 2020 and has also been steadily increasing between 2020 and 2022.

Figure 44: Number Employed, 2000- 2023

Number Employed from 2000 to 2023.

Powered by PolicyMap

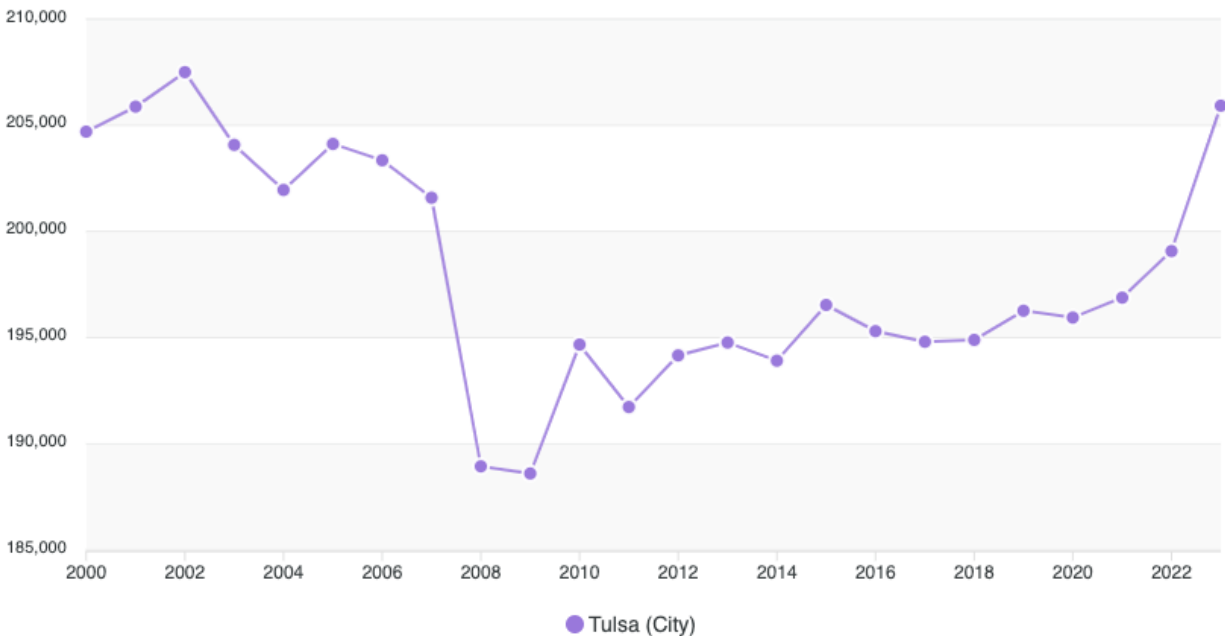


Source: PolicyMap, 2000-2023 Bureau Labor Statistics

Figure 45: Number in Labor Force, 2000- 2023

Number in Labor Force from 2000 to 2023.

Powered by PolicyMap



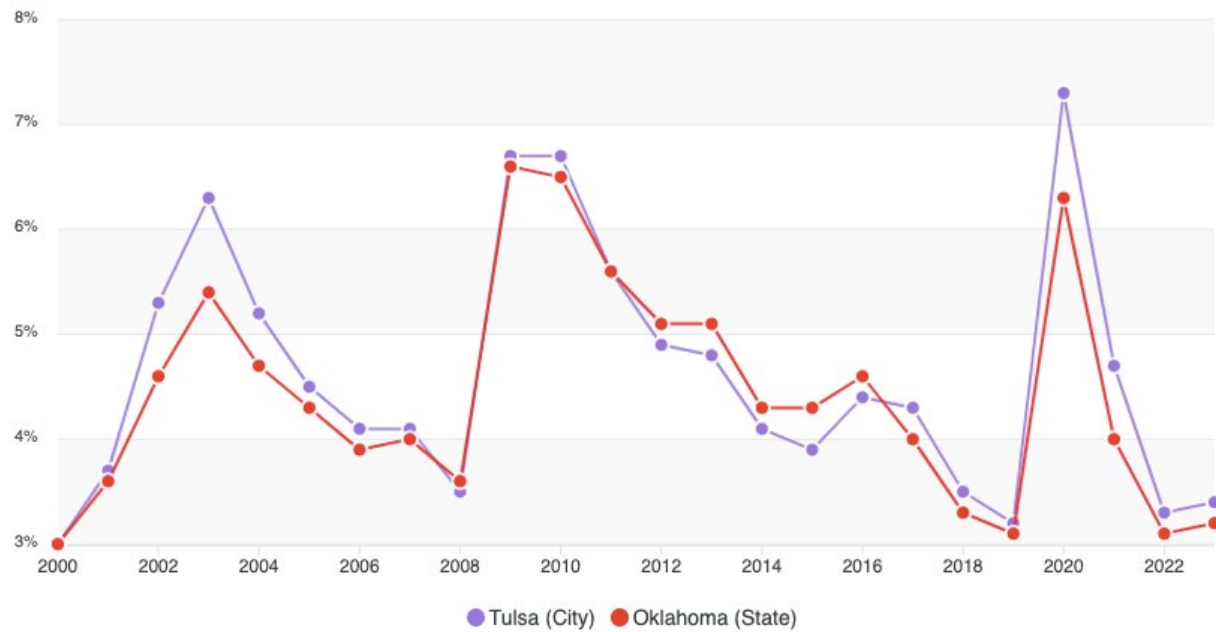
Source: PolicyMap, 2000-2023 Bureau Labor Statistics

The unemployment rate in Tulsa has remained close to the statewide unemployment rate since 2000. Since 2017, Tulsa's unemployment rate has been slightly higher than the statewide average and was 3.4% in 2023. The map in Figure 47 below shows the concentration of unemployment throughout the City between 2018 and 2022, with the darker purple shaded areas indicating tracts with higher rates of unemployment. The northwest tracts have higher rates of unemployment, which are also where the racially or ethnically concentrated areas of poverty (R/ECAPs) are – further discussion on R/ECAPs can be found in the poverty section of this chapter.

Figure 46: Unemployment Rate, 2000- 2023

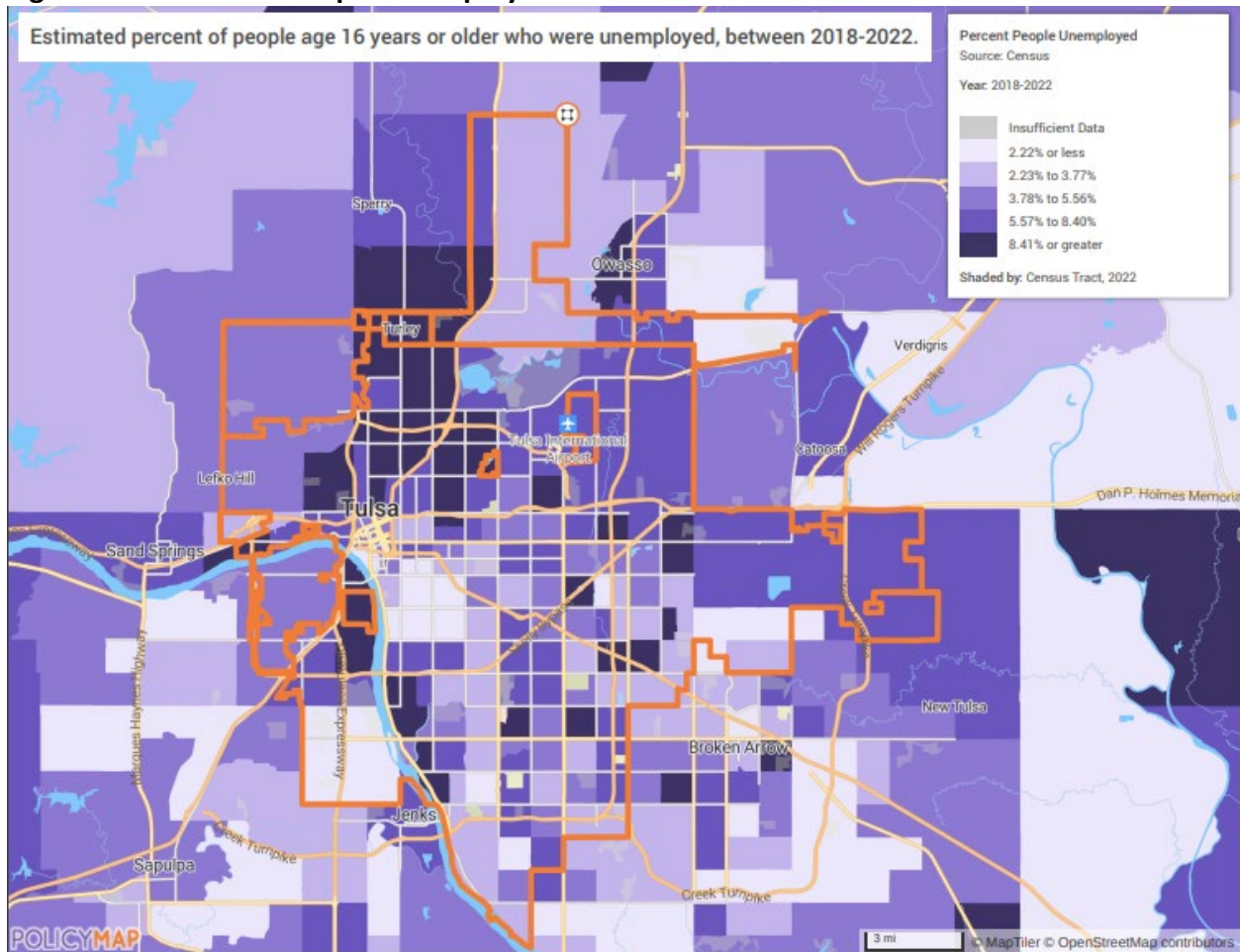
Unemployment Rate from 2000 to 2023.

Powered by PolicyMap



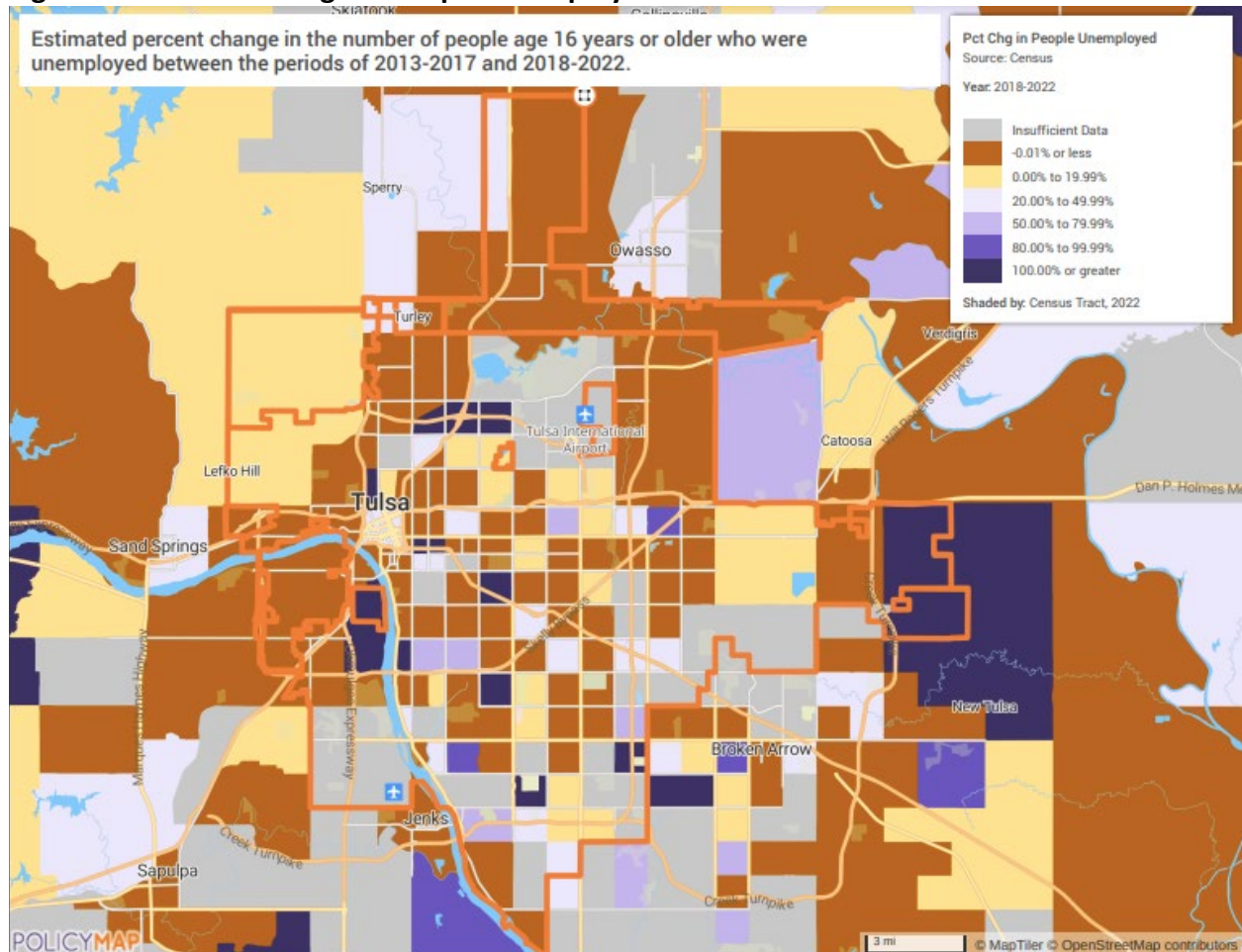
Source: PolicyMap, 2000-2023 Bureau Labor Statistics

Figure 47: Percent of People Unemployed



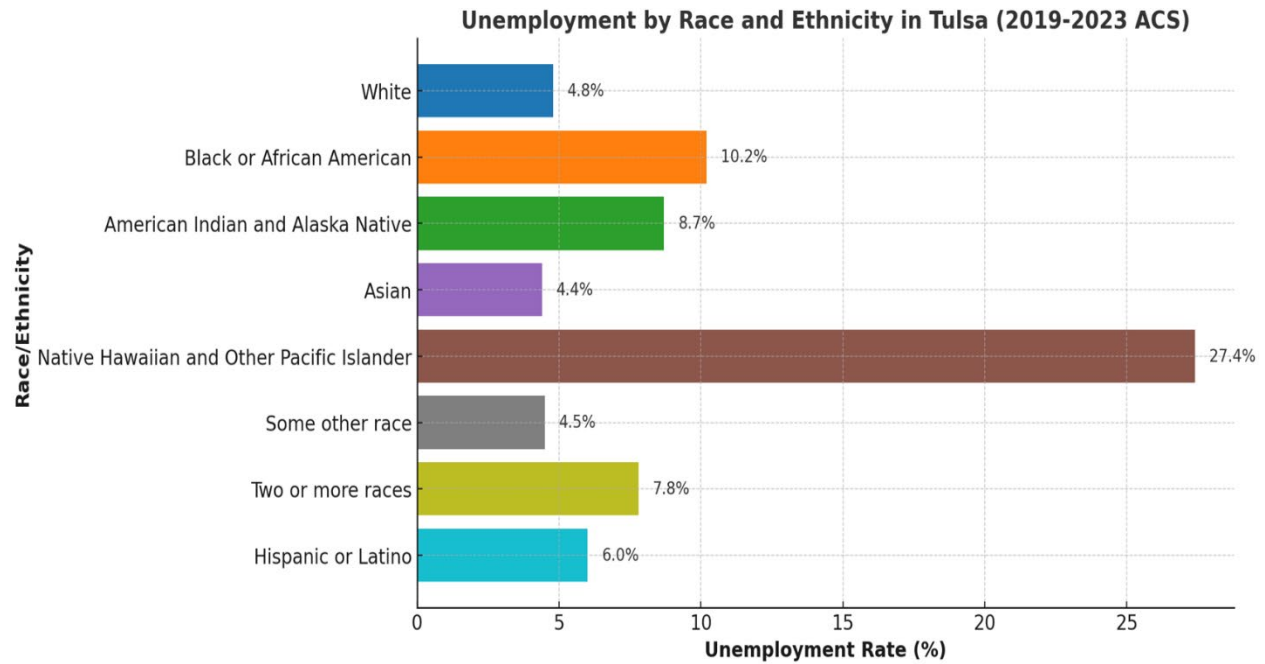
Although the unemployment rate in the City saw a –11.3% decrease in unemployment between 2017 and 2022, there are some tracts that had large increases in unemployment during that time period. The dark purple tracts in Figure 48 below indicate the areas where the unemployment rate has increased by 100% or more within the last 5 years.

Figure 48: Percent Change in People Unemployed Between 2013- 2017 and 2018- 2022



Examining unemployment rates by race and ethnicity is important for understanding economic disparities, systemic barriers, and social inequalities that different communities face. The chart in Figure 49 below shows the unemployment rates for each racial and ethnic group in Tulsa. The Native Hawaiian and Other Pacific Islander group has the highest unemployment rate at 27.4%, which is significantly higher than any other racial or ethnic group. The Black or African American community has an unemployment rate of 10.2%, which is more than double that of the White population (4.8%). The Asian and White populations have the lowest unemployment, potentially reflecting better employment access or opportunities.

Figure 49: Unemployment by Race/Ethnicity, 2019- 2023



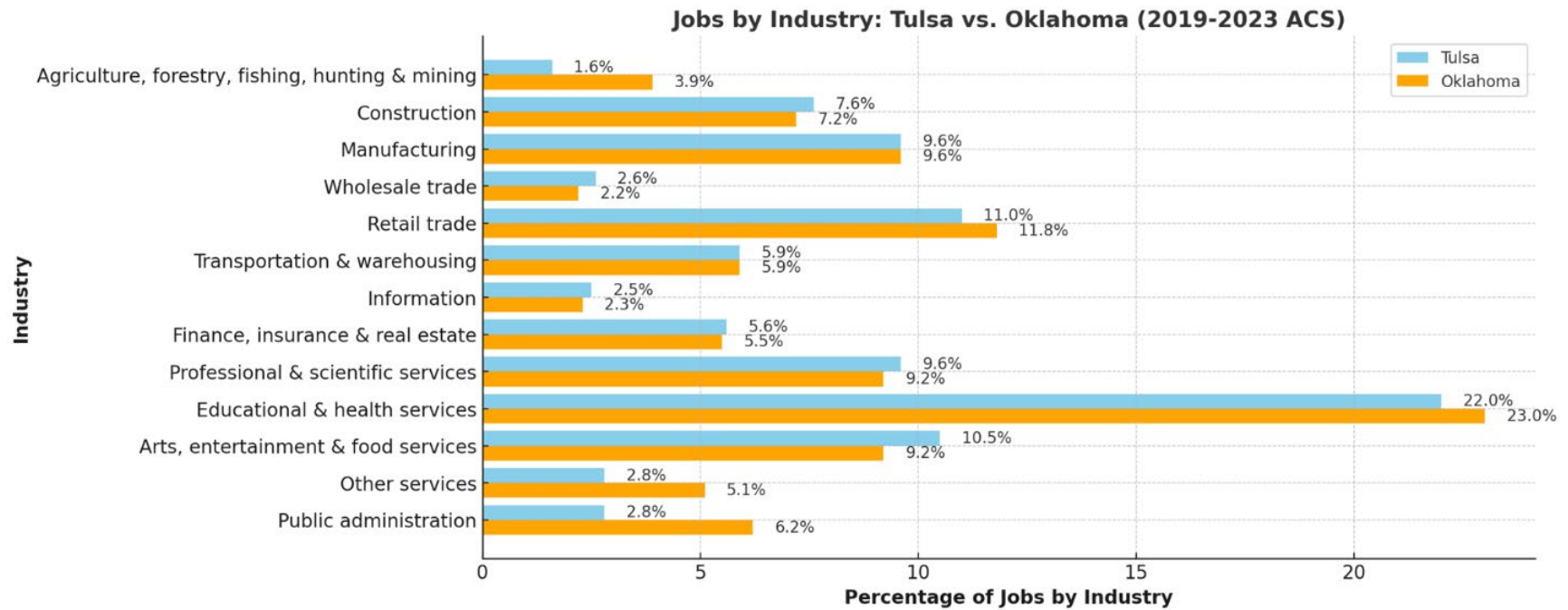
Source: 2019-2023 ACS (S2301)

Jobs by Industry

Tulsa's job market is more service-oriented, with strong representation in healthcare, education, and professional services. The Educational Services, Health Care, and Social Assistance sector is the largest employer in both Tulsa (22.0%) and Oklahoma (23.0%), reflecting the strong presence of hospitals, schools, and social programs in the state. Retail Trade is another major employer, with Tulsa at 11.0% and Oklahoma slightly higher at 11.8%. This suggests a significant portion of the workforce is in consumer-driven industries. Professional, Scientific, and Technical Services employs 9.6% in Tulsa, which is slightly higher than in Oklahoma (9.2%). A more detailed discussion on commute times and whether individuals work within or outside the City can be found in the transportation section.

Table 42: Jobs by Industry, 2019- 2023				
Industry	Tulsa		Oklahoma	
	Estimate	Percent	Estimate	Percent
Agriculture, forestry, fishing and hunting, and mining	3,184	1.6%	70,517	3.9%
Construction	14,971	7.6%	130,633	7.2%
Manufacturing	19,512	9.9%	169,093	9.4%
Wholesale trade	5,149	2.6%	40,413	2.2%
Retail trade	22,677	11.5%	213,050	11.8%
Transportation and warehousing, and utilities	11,651	5.9%	107,007	5.9%
Information	4,265	2.2%	25,994	1.4%
Finance and insurance, and real estate and rental and leasing	11,857	6.0%	99,468	5.5%
Professional, scientific, management, administration, waste management	23,628	12.0%	165,980	9.2%
Educational services, health care, social assistance	43,142	22.0%	416,261	23.0%
Arts, entertainment, recreation, accommodation, and food services	20,625	10.5%	165,842	9.2%
Other services	10,273	5.2%	92,278	5.1%
Public administration	5,493	2.8%	111,864	6.2%
Source: 2019-2023 ACS (DP03)				

Figure 50: Jobs by Industry, Tulsa and Oklahoma, 2019- 2023



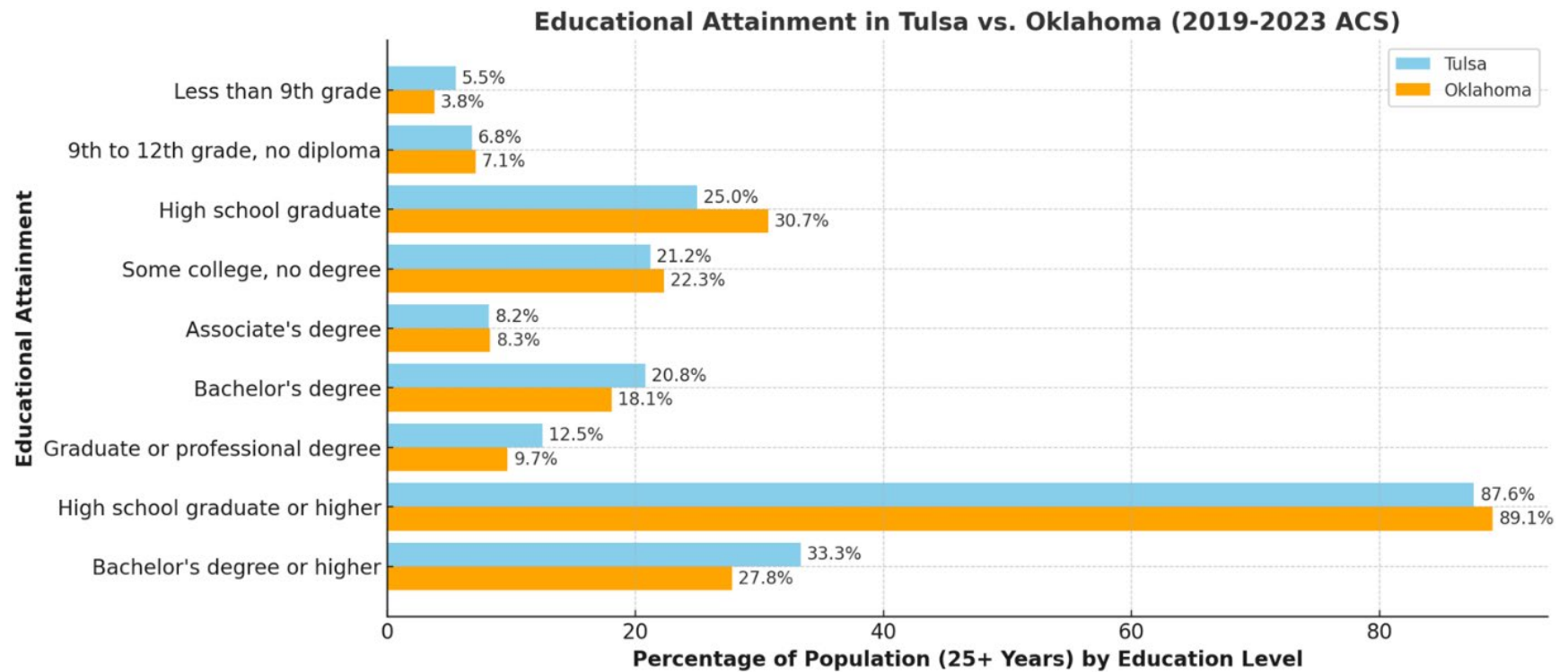
Source: 2019-2023 ACS (DP03)

Education

Table 43 and Figure 51 below provide educational attainment data for the population aged 25 and older in Tulsa and Oklahoma. A large majority of the population (25+ years old) in both Tulsa (87.6%) and Oklahoma (89.1%) have at least a high school diploma. Higher education (bachelor's degree or higher) is more common in Tulsa (33.3%) than in Oklahoma overall (27.8%), suggesting that Tulsa has a more highly educated workforce compared to the state average. Similarly, graduate or professional degrees are more common in Tulsa (12.5%) than in Oklahoma (9.7%). Tulsa has a slightly higher percentage of people with less than a 9th-grade education (5.5%) compared to Oklahoma (3.8%). Tulsa has a more educated population overall, with a greater percentage of individuals holding bachelor's and graduate degrees. This suggests a stronger presence of universities, businesses requiring specialized skills, and industries that attract a more educated workforce.

Table 43: Educational Attainment of Population 25 Years and Over, 2019- 2023				
Educational Attainment	Tulsa		Oklahoma	
	Number	Percent	Number	Percent
Total Population aged 25 years or older	271,754		2,641,325	
Less than 9th grade	15,011	5.5%	100,466	3.8%
9th to 12th grade, no diploma	18,575	6.8%	186,612	7.1%
High school graduate (includes equivalency)	67,965	25.0%	811,387	30.7%
Some college, no degree	57,580	21.2%	588,667	22.3%
Associate's degree	22,250	8.2%	220,400	8.3%
Bachelor's degree	56,512	20.8%	478,236	18.1%
Graduate or professional degree	33,861	12.5%	255,557	9.7%
High school graduate or higher	238,168	87.6%	2,354,247	89.1%
Bachelor's degree or higher	90,373	33.3%	733,793	27.8%
Source: 2019-2023 ACS (DP02)				

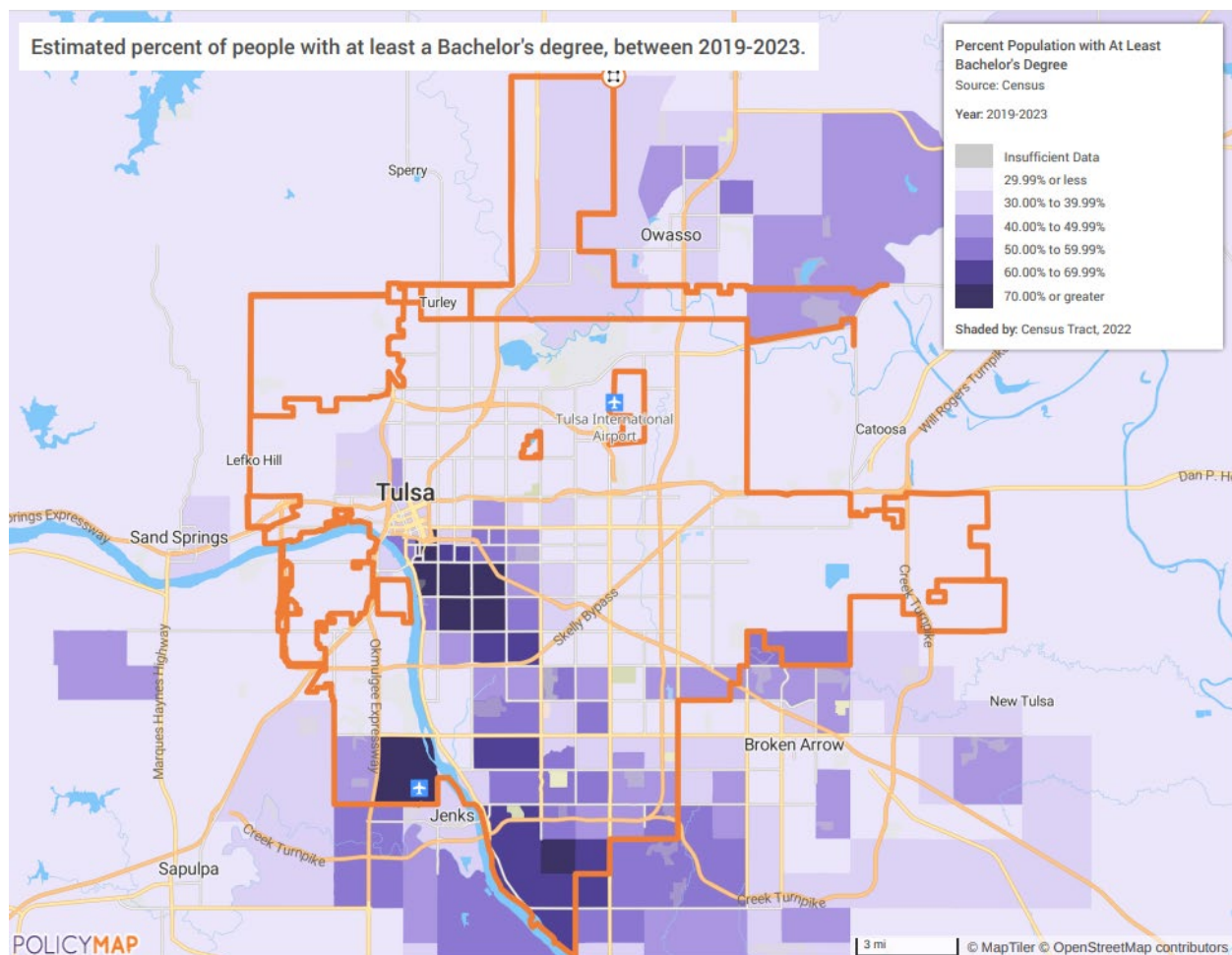
Figure 51: Educational Attainment, 2019- 2023



Source: 2019-2023 ACS (DP02)

The map in Figure 52 below illustrates the distribution of educational attainment (at least a bachelor's degree) across Tulsa. The southern and southeastern portions of Tulsa have the highest concentrations of people with a bachelor's degree, with some tracts having 70% or more of people with a bachelor's degree. The northernmost and westernmost sections of Tulsa, as well as some parts of East Tulsa, show the lowest concentration of individuals with a bachelor's degree. These areas often have higher economic challenges, which may impact access to higher education.

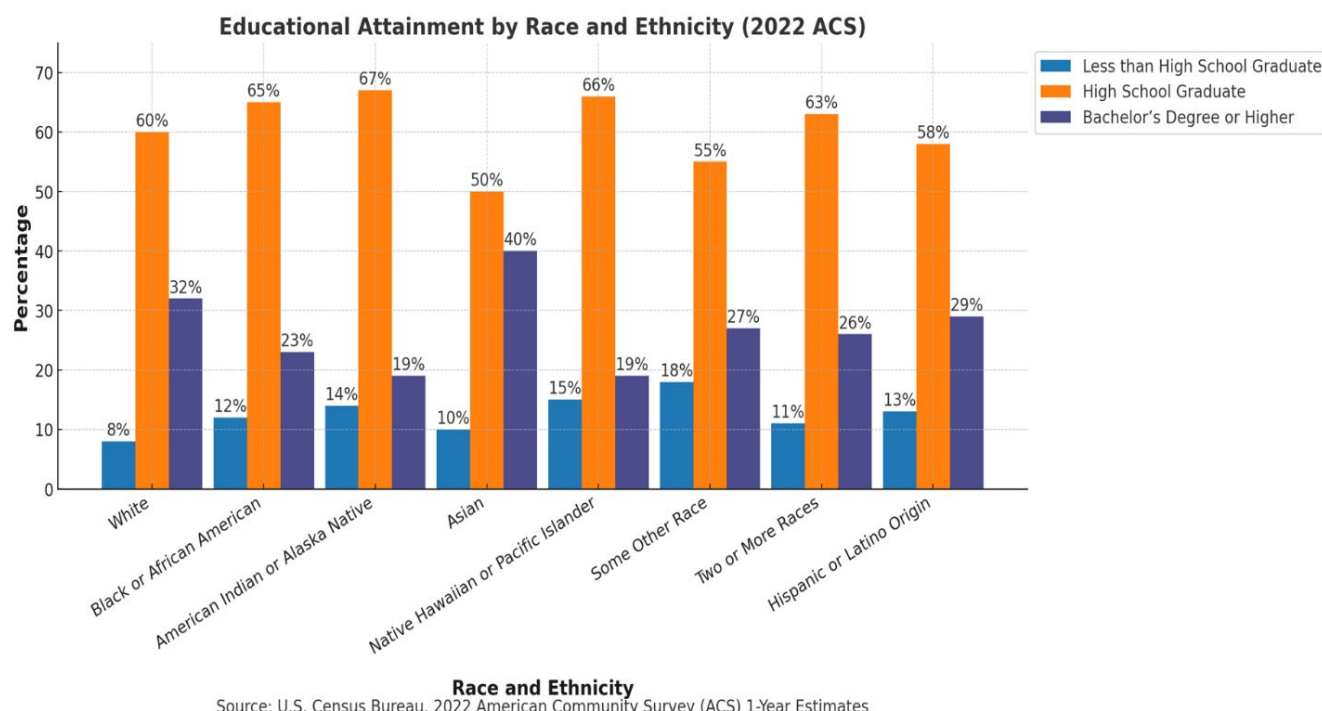
Figure 52: Percent of People with at least a Bachelor's Degree, 2019- 2023



In 2023, the Oklahoma Employment Security Commission (OESC) published The Tulsa MSA Local Briefing –2023. The chart in Figure 53 below shows Tulsa's MSA educational attainment levels by race and ethnicity in 2022, which was included in the referenced report by OESC. The Asian population has the highest percentage of bachelor's degree or higher (40%), followed by the White population (32%). Those who identify as "some other race" (18%), Hispanic or Latino

population (13%), and Black or African American (12%) populations have the highest percentages of people without a high school diploma. The Hispanic or Latino (29%) and Two or More Races (26%) groups have relatively low levels of bachelor's degree attainment compared to White and Asian populations.

Figure 53: Educational Attainment by Race/Ethnicity, 2022

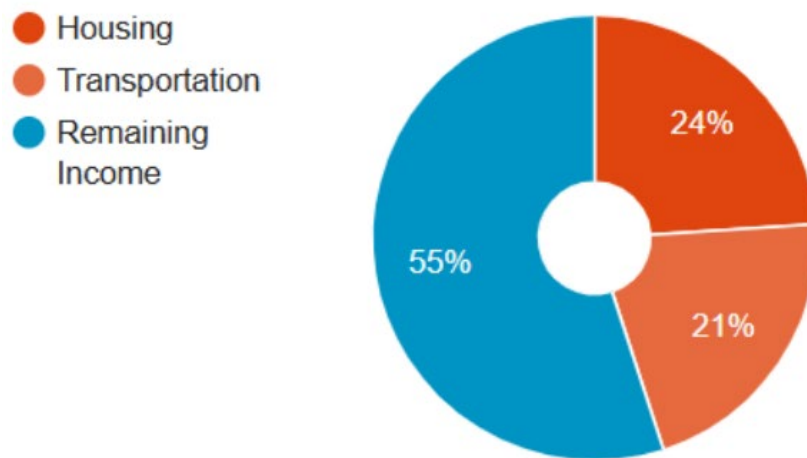


Transportation

Housing and Transportation Costs

The Center for Neighborhood Technology's Housing and Transportation Affordability Index (H+T Index) measures both the cost of housing the cost of transportation in a specific area to better understand affordability. The pie chart in Figure 54 below illustrates the proportion of income spent on housing and transportation costs in Tulsa for a typical household, with the other portion representing the remaining income. Housing expenses - including rent or mortgage payments, property taxes, utilities, and maintenance costs - make up nearly a quarter (24%) of the average income expenses. Transportation expenses – including costs for gas, public transit, vehicle maintenance, insurance, and other commuting expenses - account for 21% of income. After housing and transportation expenses, residents are left with an estimated 60% of their income for all other expenses – including food, healthcare, education, entertainment, and savings.

Figure 54: Average Housing and Transportation Costs as Percentage of Income



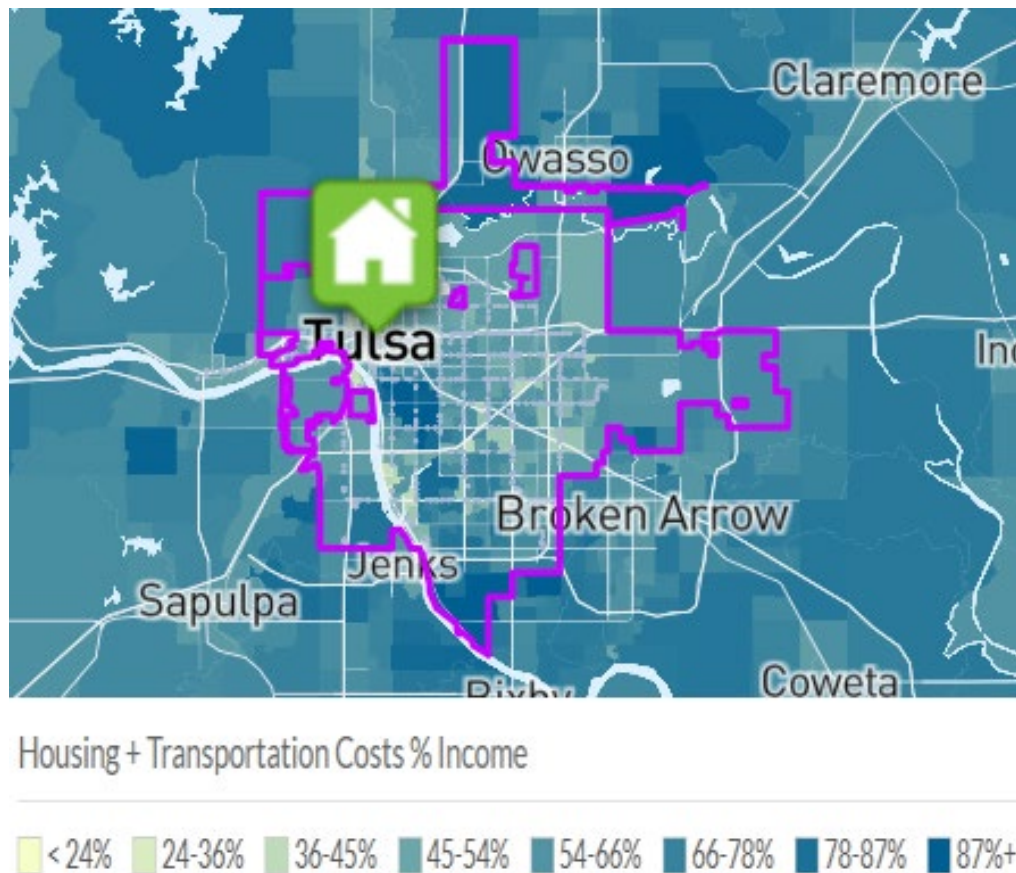
Source: The Center for Neighborhood Technology (CNT)

For moderate-income households, or those earning 60% of the area median income, housing and transportation costs take up a larger share of their income compared to the city average. While these expenses account for approximately 45% of total income in Tulsa, they rise to 54% for moderate-income households. The map in Figure 55 below illustrates the average percentage of income allocated to housing and transportation for moderate-income households, with darker shades representing higher cost burdens. Among these households:

- 16.8% spend 36-45% of their income on housing and transportation,
- 42.7% allocate 45-54%, and
- 21.1% dedicate 54-66% of their income to these expenses.

This data highlights the financial strain faced by moderate-income households and the varying cost burdens across different areas in Tulsa.

Figure 55: Housing and Transportation Costs as a Percentage of Income for Moderate Income Households



Transportation Options

Tulsa offers a variety of transportation options, including public transit, road and highway networks, and bike and walking paths. Below is a breakdown of available transit options:

1. Public Transit (below is a visual of the System Map) – Metrolink Tulsa, formerly known as Tulsa Transit, is the city's primary public transportation provider in Tulsa, Oklahoma, and surrounding areas. It operates a network of 21 regular routes and 4 night routes. Services offered include:
 - Fixed-route bus service: Operates Monday through Saturday from early morning to early evening, with nightline routes extending service until midnight. Limited Sunday service is also available.
 - Aero Bus Rapid Transit (BRT): Connects North and South Tulsa with frequent service approximately every 15-20 minutes.

- MicroLink: a microtransit service operating in specific zones, connecting passengers to fixed routes. Users can request rides through various platforms, with service hours varying by zone.
 - LinkAssist Paratransit: Curb-to-curb service for individuals with disabilities who have been determined ADA Paratransit Eligible.
2. Carpooling Service
 - INCOG Rideshare Program: helps commuters share rides to reduce costs.
 3. Bike and pedestrian accessibility:
 - Bike lanes and trails: Tulsa has several bike lanes and paths, including the River Parks Trail and Midland Valley Trail. Additionally, INCOG's GO Plan focuses on expanding bike-friendly infrastructure.
 - This Machine Tulsa is a bike-sharing system with docking stations across downtown and midtown. Users can rent bikes via an app for short trips and commuting.
 4. Roads and Highways
 - Major highways include I-44, I-244, U.S. 75, U.S. 169, and the Creek Turnpike provide major road access.

Figure 55: MetroLink Tulsa System Map



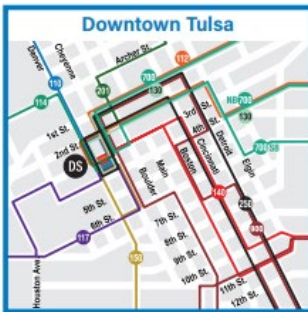
Daytime Map

MetroLinkOK.org

For information on Express Routes and Park & Ride locations, see Route 900.

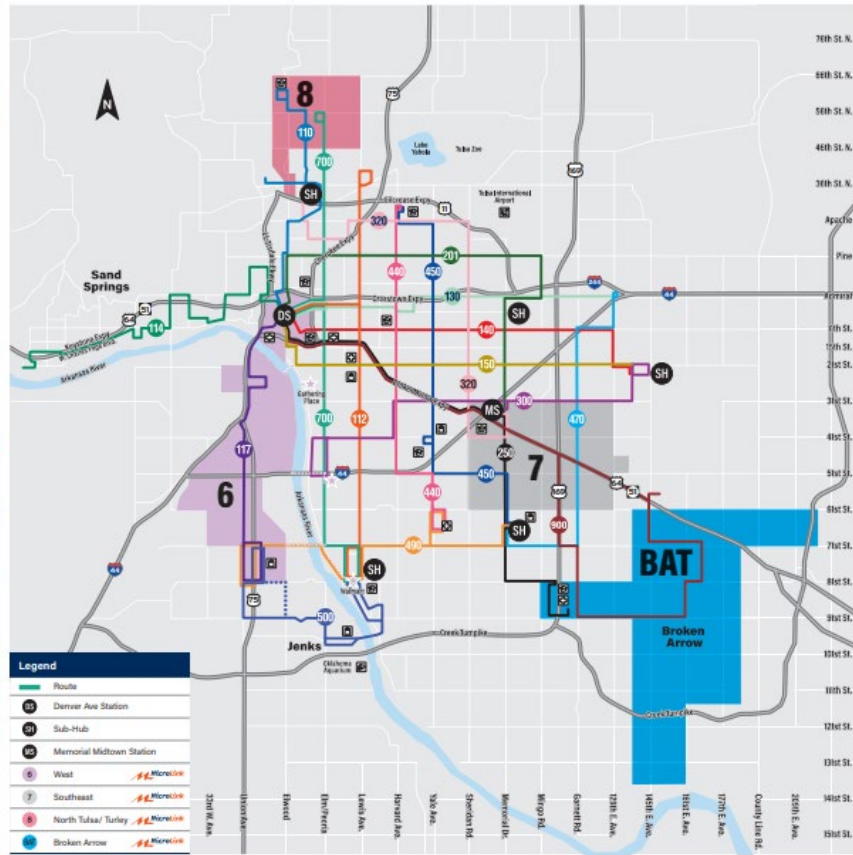
Route Listing

110 MLK/ Hartford	300 31st Street
112 Lewis	320 Sheridan
114 Charles Page/ Sand Springs	440 Harvard
117 Southwest Blvd./ Union	450 Yale
130 Admiral	470 Garnett
140 11th Street	480 West Tulsa/ 71st Street
150 21st Street	500 Jenks Connector
201 Pine/ Memorial	700 AERO Peoria
200 Crosstown	900 Union Express



Service Hours:

Zones 6-8
Mon-Sat: 6 AM to 6:30 PM
Zone BAT
Mon-Fri: 7 AM to 6 PM



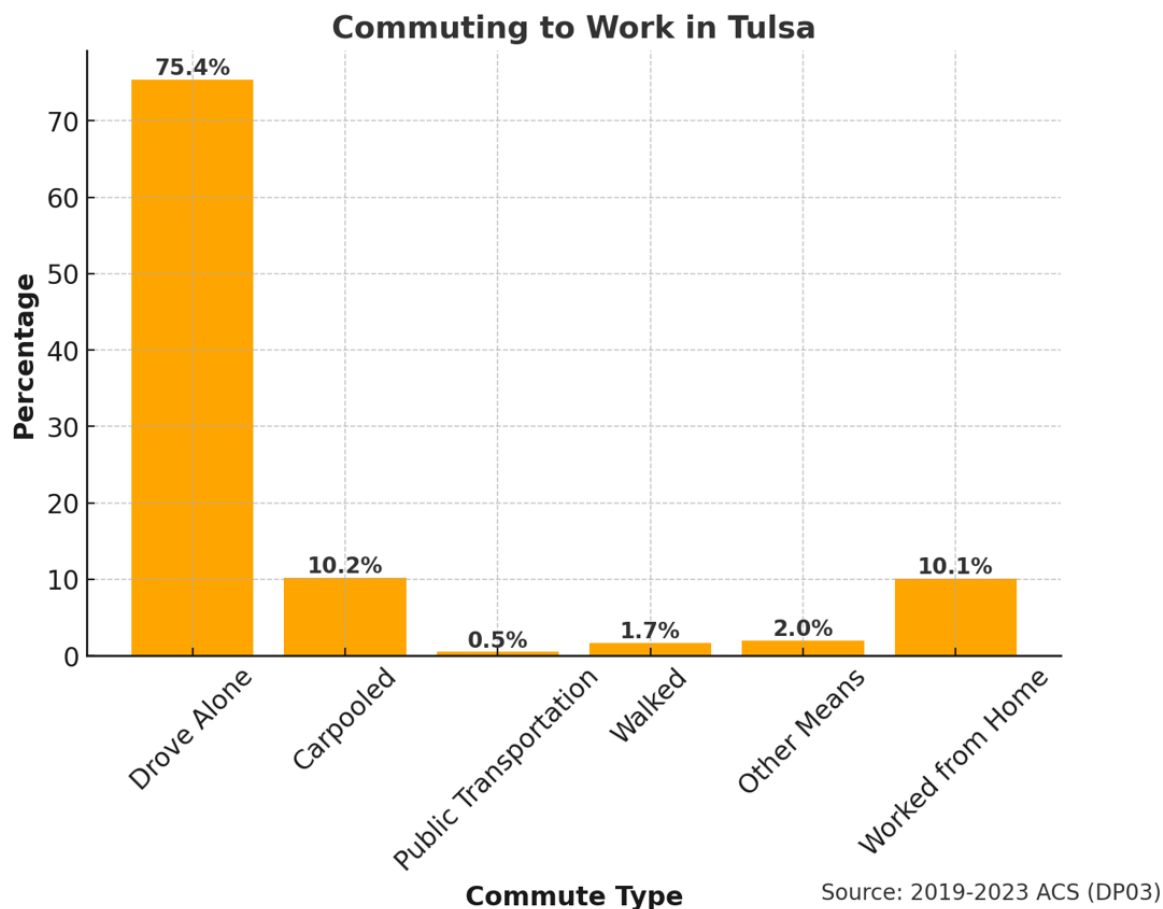
Airports Hospitals University, College Malls Park & Ride All routes are wheelchair accessible.

Note: See individual route maps for detailed routing information.

Commute

The chart in Figure 56 below illustrates how workers in Tulsa commute to work. The vast majority (75.4%) of Tulsa workers commute alone in a car, truck, or van. This highlights the city's strong reliance on personal vehicles for transportation. Only 0.5% of commuters use public transportation, indicating a very low reliance on Tulsa's transit system. The low public transportation usage suggests that Tulsa may need improvements in transit infrastructure, accessibility, or service efficiency to encourage more residents to use buses and other shared transport.

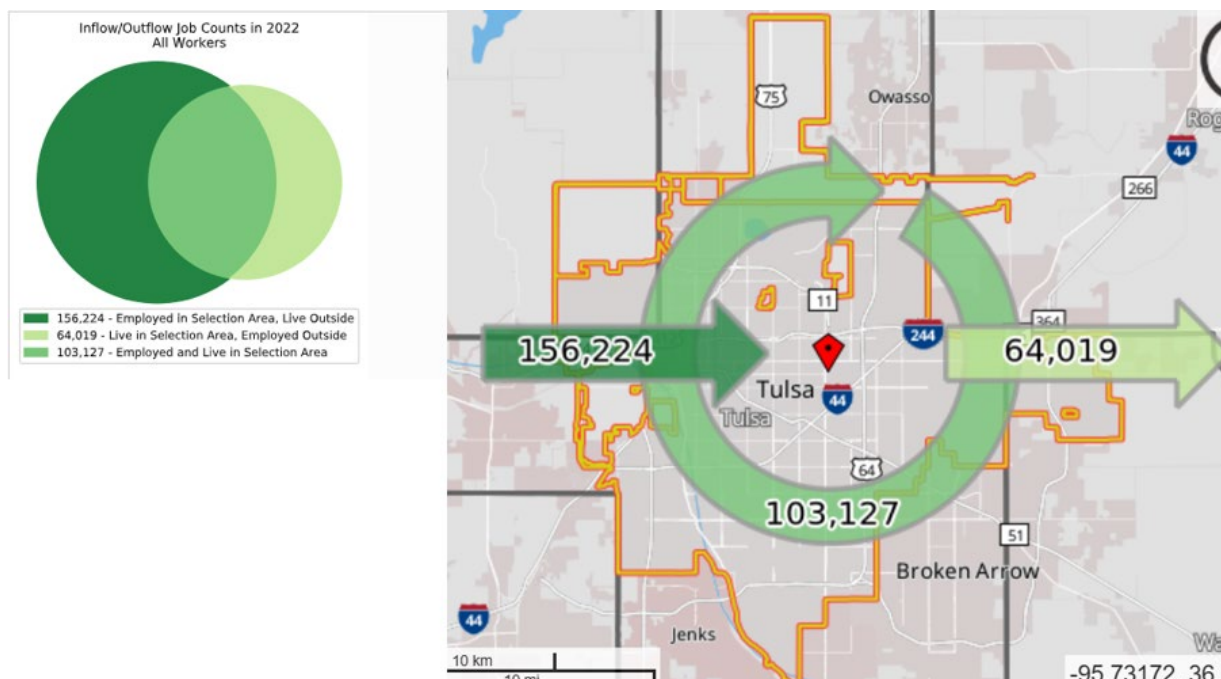
Figure 56: Commute Type by Percentage, 2019- 2023



OnTheMap Census is an online tool provided by the U.S. Census Bureau to offer insights into commuting patterns in an area. It uses data from the Longitudinal Employer-Household Dynamics (LEHD) program to help understand the relation between where people work and where they live. In 2022, 60.2% of those that worked in the City lived outside of it. Further, 38.3% of people living in the City commuted outside for employment, while 61.7% both lived and worked in the City. Overall more workers commuted into the City (156,224) for work than commuted out

(64,019). With a high number of people commuting into the City for work, there is a higher probability of increased traffic congestion, highlighting the importance of increased and expanded public transit options.

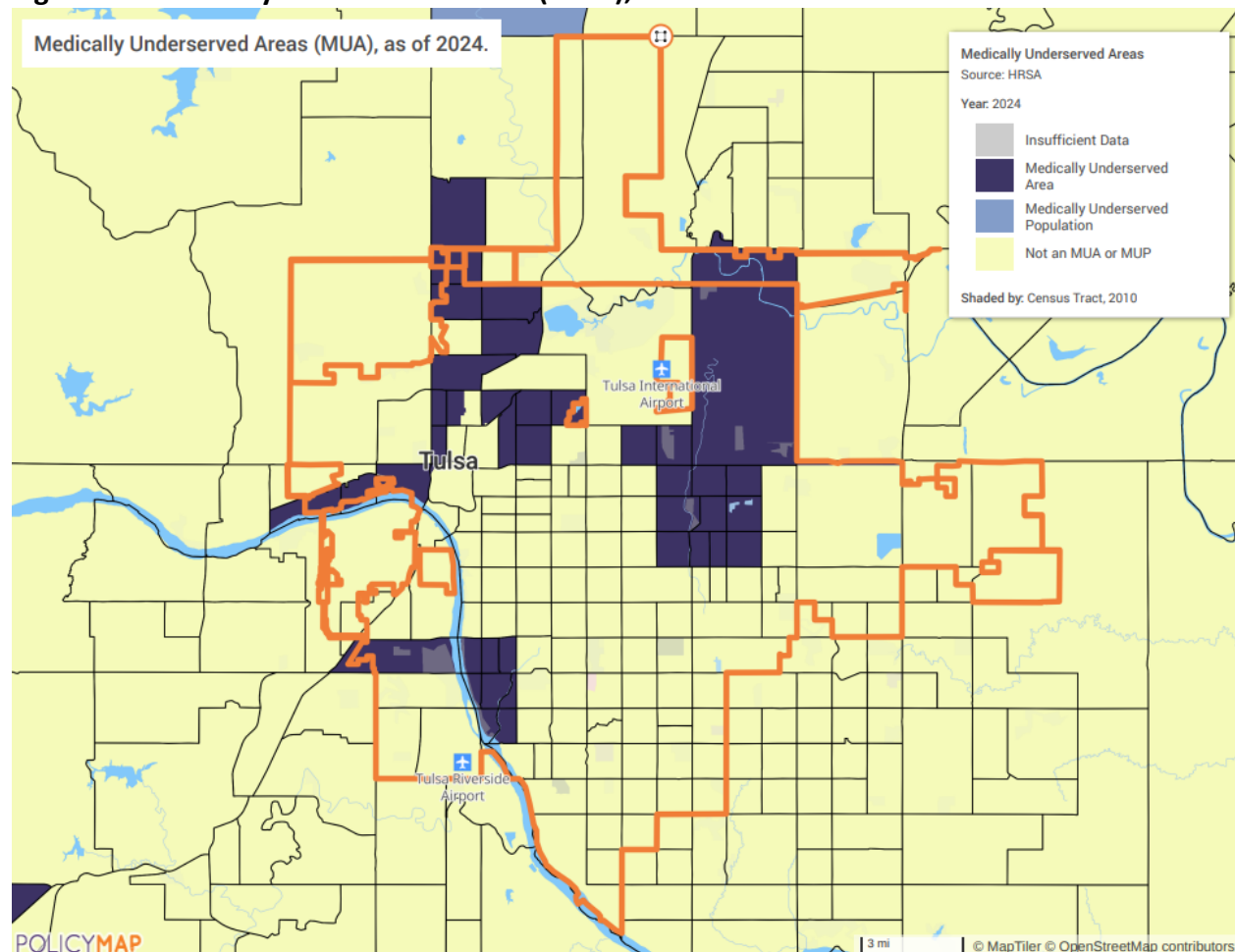
Figure 57: Inflow/Outflow Analysis



Healthcare

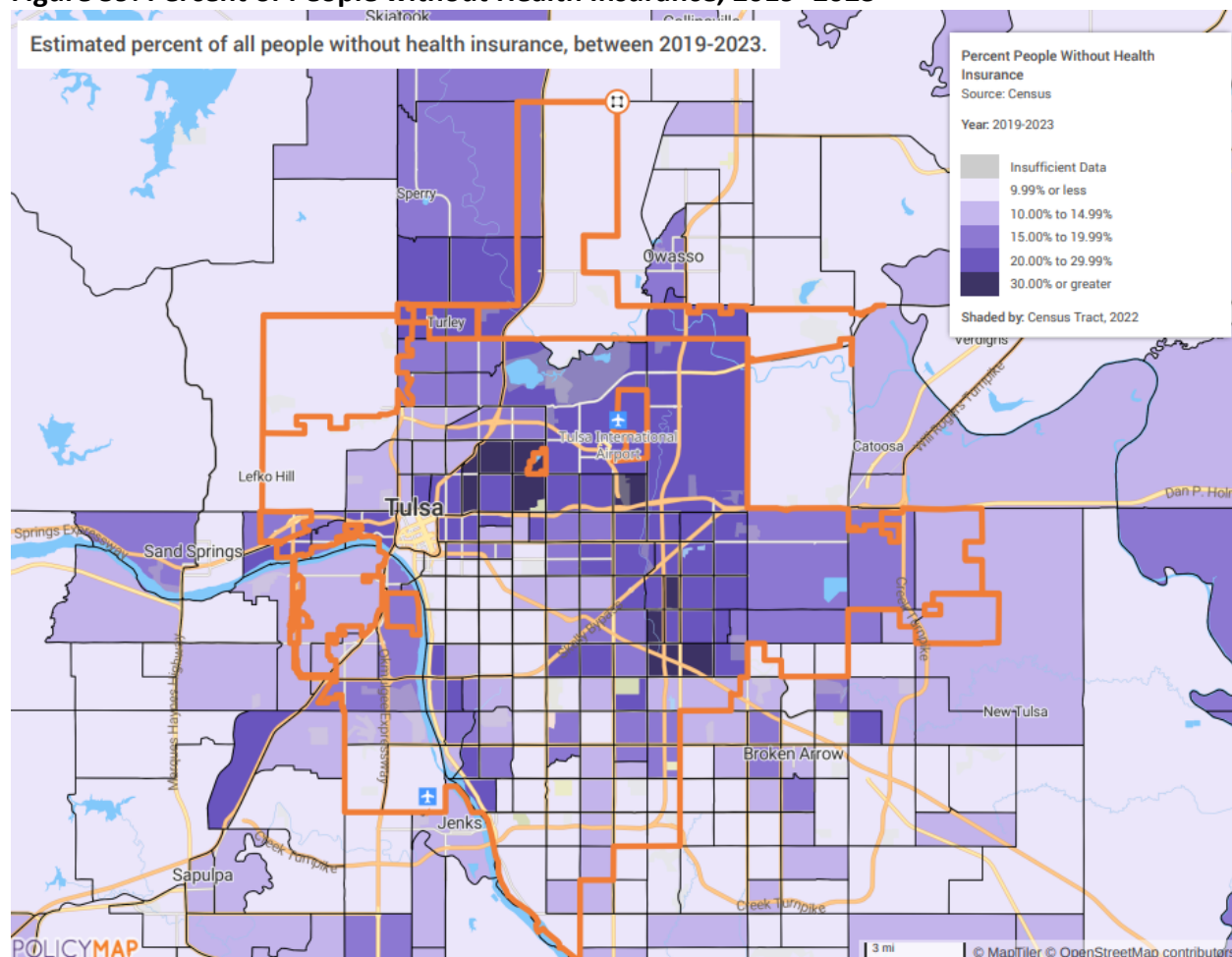
Medically Underserved Areas (MUAs) are areas where a specific population group are underserved or have limited access to primary healthcare services. MUAs are designated by the Health Resources & Services Administration (HRSA) using the Index of Medical Underservice (IMU) score. If an area scores below a certain threshold, it is designated as an MUA. An IMU score is determined by looking at the ratio of primary care providers to the population, the infant mortality rate, the percentage of the population living below the poverty level, and the percentage of the population aged 65 or older. The map in Figure 58 below highlights the MUAs in Tulsa in 2024, indicated by the blue shaded regions. These areas are concentrated north of downtown Tulsa, particularly around Tulsa International Airport and extending further north. There are also concentrations of MUA's in the northwest part of the City and in the southwest corner.

Figure 58: Medically Underserved Areas (MUA), 2024



The map in Figure 59 below provides an estimated percentage of people without health insurance between 2019 and 2023, with darker shaded areas indicating tracts with a higher percentage of uninsured individuals. The darkest purple areas (representing 30% or more uninsured) are concentrated in the upper central area of the city. Many tracts with higher uninsured rates correlate with areas identified as Medically Underserved Areas (MUA) in the previous map, suggesting a strong relationship between lack of health insurance and limited healthcare access.

Figure 59: Percent of People without Health Insurance, 2019- 2023

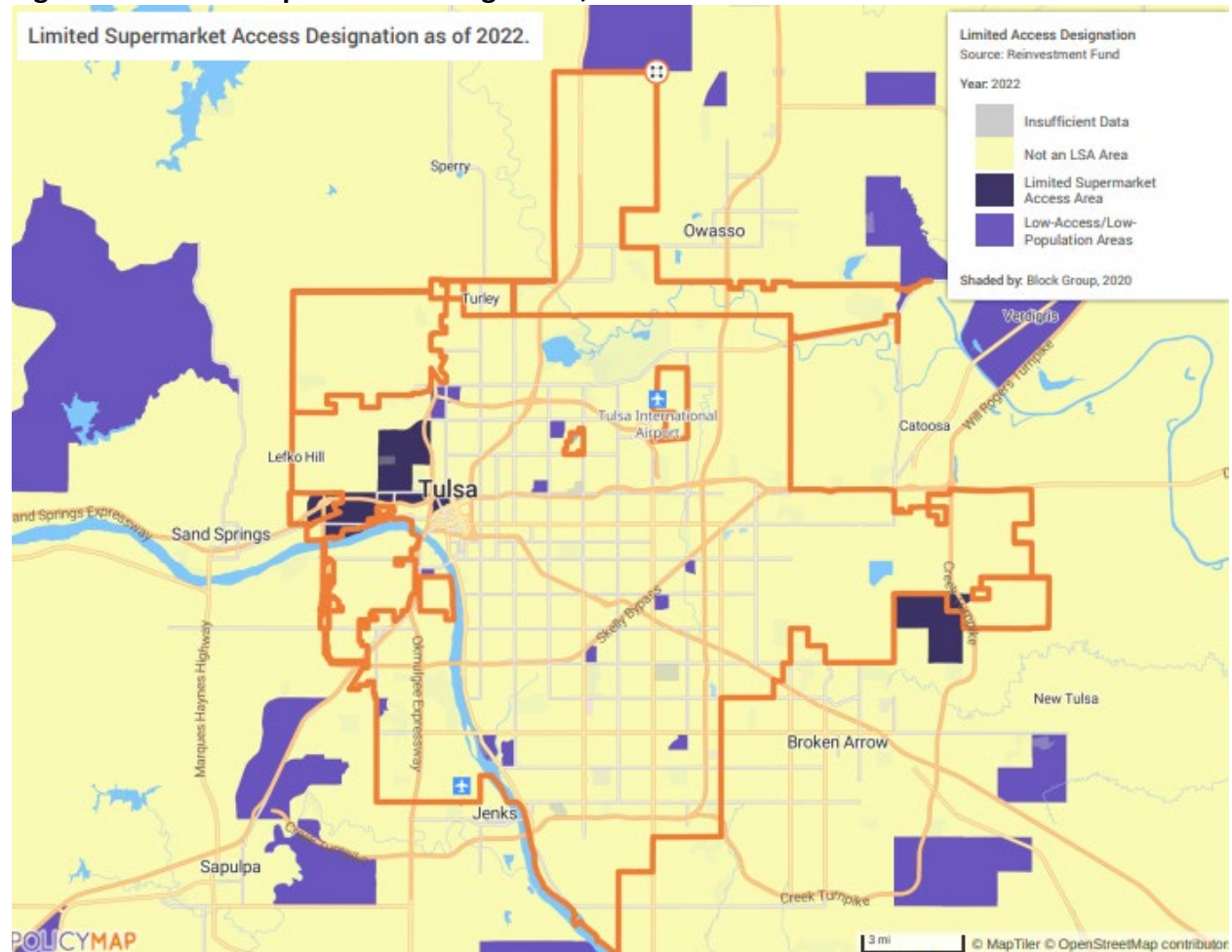


Food Access

The map in Figure 60 below illustrates Limited Supermarket Access (LSA) areas in Tulsa based on 2022 data from the Reinvestment Fund. LSA's are areas where residents have difficulty accessing full-service grocery stores or supermarkets based on factors like distance to the nearest grocery store, availability of transportation, and socioeconomic conditions. LSA areas impact a community's ability to access affordable and nutritious food which can potentially contribute to higher rates of chronic disease (ie. Heart disease, diabetes). The dark blue shaded areas on the map represent Limited Supermarket Access zones, meaning residents struggle to find grocery stores nearby. People may have to rely on public transit if they do not have a personal vehicle to get to larger grocery stores. There is a concentration of LSA's in west Tulsa, The lighter purple shaded areas are low-access, low-population areas, meaning they are LSA areas that also have low population density. These areas may not have enough residents to support large grocery

store chains, making food access more difficult. Low-access/low-population areas are more common in the outskirts of Tulsa, where population density is lower.

Figure 60: Limited Supermarket Designation, 2022



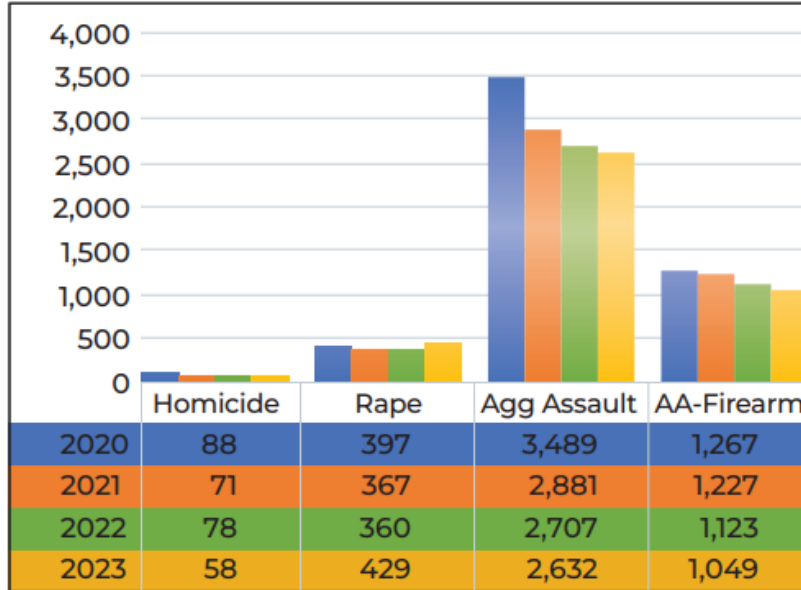
Crime

The Oklahoma State Bureau of Investigations reported a total of 69,769 violent crimes in 2024. The chart in Figure 61 below shows a four-year comparison of violent crimes in Tulsa, published in Tulsa Police Department's 2023 Annual Report. From 2020 to 2023, homicides decreased by 34%. While rape cases declined from 2020 to 2022, 2023 saw a sharp increase (19.2%). This could indicate underreporting in previous years or an actual rise in incidents. Aggravated assault cases had a 24.6% decrease from 2020 to 2023.

Figure 61: Crimes Against Person, 2023

CRIMES AGAINST PERSON

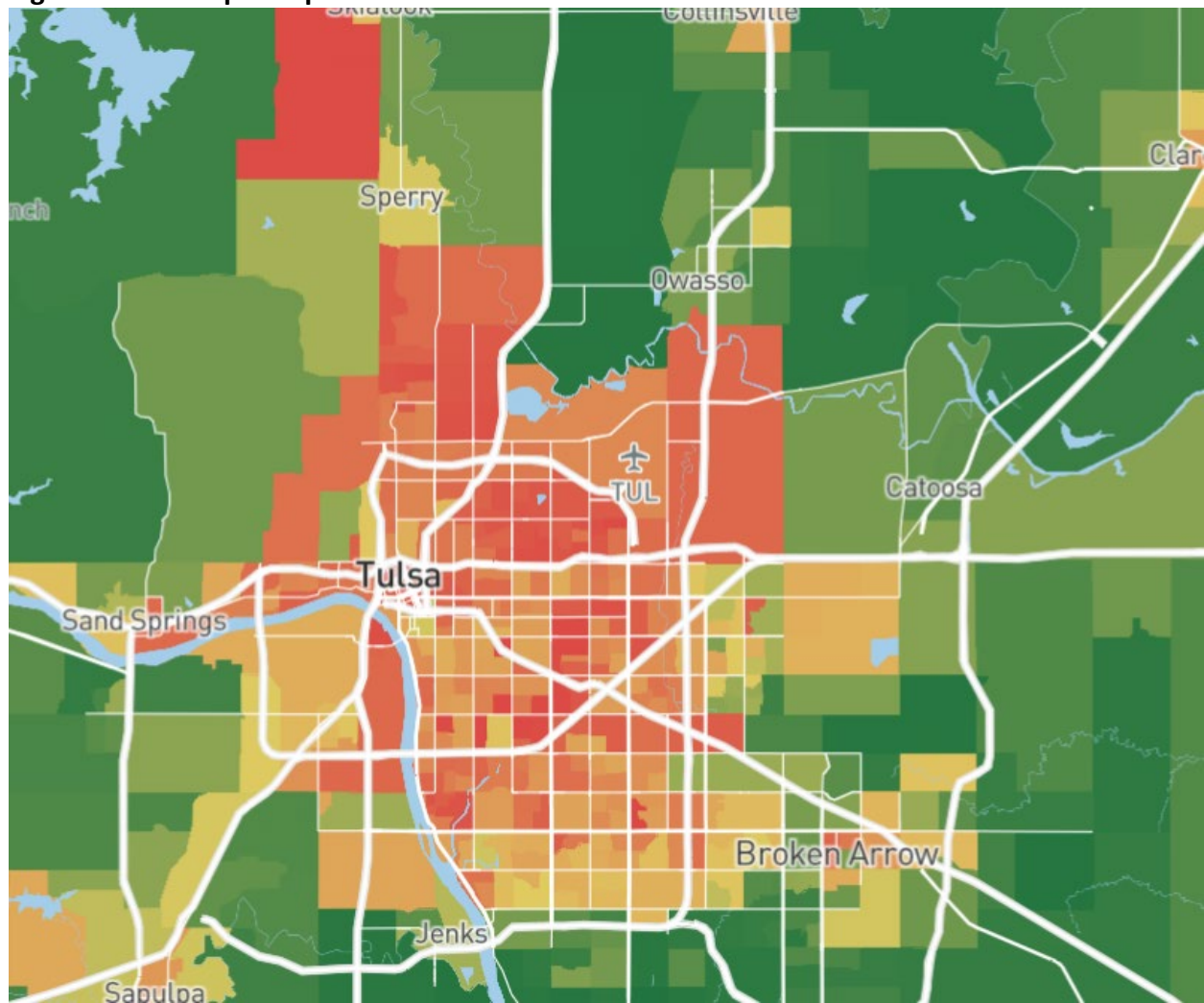
Four Year Comparisons:



Source: Tulsa Police Department 2023 Annual Report

The following map in Figure 62, produced by Crime Grade, shows overall crime per 1,000 Tulsa residents, with dark green areas indicating the safest areas and the red areas indicating the least safe areas. On average, a crime occurs every 11 minutes in the city. The downtown area and surrounding central Tulsa have the highest concentrations of crime, with hot spots extending north toward Sperry and northeast around Owasso.

Figure 62: Crime per Capita in Tulsa



SECTION V. FAIR HOUSING LAWS AND GUIDANCE

Federal fair housing laws prohibit discrimination in the sale, rental or lease of housing, and in negotiations for real property, based on race, color, religion, sex, national origin, familial status and disability. Oklahoma fair housing laws build on the federal laws, including age and pregnant women. Fair housing describes a condition in which individuals of similar income levels in the same housing market have like ranges of choice available to them regardless of their characteristics protected by the law or other arbitrary factors.

Federal Fair Housing Laws

Federal laws provide the backbone for U.S. fair housing regulations. While some laws have been previously discussed in this report, a brief list of laws related to fair housing, as defined on the U.S. Department of Housing and Urban Development's (HUD's) website, is presented below:

Fair Housing Act 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 18 living with parents or legal custodians, pregnant women, and persons securing custody of children under the age of 18), and handicap (disability).

Title VIII was amended in 1988 (effective March 12, 1989) by the Fair Housing Amendments Act. In connection with prohibitions on discrimination against individuals with disabilities, the Act contains design and construction accessibility provisions for certain new multi-family dwellings developed for first occupancy on or after March 13, 1991.

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

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

Section 109 of the Housing and Community Development Act of 1974. Section 109 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 and Block Grant Program.

Title II of the Americans with Disabilities Act of 1990. Title II 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. The Architectural Barriers Act requires that buildings and facilities designed, constructed, altered, or leased with certain federal funds after September 1969 be accessible to and usable by handicapped persons.

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

Title IX of the Education Amendments Act of 1972. Title IX prohibits discrimination on the basis of sex in education programs or activities that receive federal financial assistance.

Fair Housing Related Presidential Executive Orders

Executive Order 11063. 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 11246. Executive Order 11246, issued in 1965 by President Lyndon B. Johnson was revoked by President Donald Trump in January 2025. The Executive Order, as amended, barred discrimination in federal employment because of race, color, religion, sex, or national origin for 60 years.

Executive Order 12892. 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, which will be chaired by the Secretary of HUD.

Executive Order 12898. Executive Order 12898, issued in 1994 by President Bill Clinton was revoked by President Donald Trump in January 2025. The order required that 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. Executive Order 13166, signed by President Bill Clinton, reiterated law and policies related to language access for individuals with limited English proficiency (LEP) and ensured that federal agencies work to eliminate discrimination against LEP individuals. President Donald Trump rescinded this order in 2025. Despite the rescission, however, language access remains the law. [Title VI](#) of the Civil Rights Act of 1964 prohibits discrimination on the basis of “national origin,” which the Supreme Court has interpreted as including language.

Executive Order 13217. 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.

Executive Order 13985 titled “Advancing Racial Equity and Support for Underserved Communities Through the Federal Government” was enacted by President Joseph Biden in January 2021 and revoked by President Trump in January 2025. The order aimed to strengthen the federal government’s ability to address barriers to equal opportunity faced by underserved communities. The order further directs federal agencies to conduct equity assessments and identify systemic barriers to access faced by underserved communities. President Biden followed up on this Executive Order with a memorandum on Redressing Our Nation’s and the Federal Government’s History of Discriminatory Housing Practices and Policies. This Executive Action acknowledged that “... Federal, State, and local governments systematically implemented racially discriminatory housing policies that contributed to segregated neighborhoods and inhibited equal opportunity and the chance to build wealth” for BIPOC (Black, Indigenous, and People of Color), and that those legacies of residential segregation and discrimination remain in existence today – from gaps in homeownership and wealth to environmental inequalities made worse by climate change. The memo outlines multiple ways in which the federal government’s discriminatory policies affected opportunities for safe and affordable housing, jobs, transportation, particularly for Black people. It also addresses the history of the federal government’s disinvestment in communities of color, despite the passage of the Fair Housing Act in 1968.

Executive Order 13988, issued by President Joseph Biden in January 2021 was revoked by President Donald Trump in January 2025. The order directed all federal agencies to review all policies which implement the non-discrimination protections on the basis of sex ordered by Title VII of the Civil Rights Act of 1964 (pursuant to the Supreme Court case *Bostock v. Clayton County*), Title IX of the Education Amendments of 1972, the Fair Housing Act and section 412 of the Immigration and Nationality Act of 1965 and to extend these protections to the categories of sexual orientation and gender identity.

HUD Fair Housing Guidance

Guidance on Application of Fair Housing Act Standards to the Use of Criminal Records

The Fair Housing Act prohibits discrimination in the sale, rental, financing of dwellings and in other housing-related activities on the basis of race, color, religion, sex, disability, familial status or national origin. In April 2016, HUD’s Office of General Counsel issued guidance on the

discriminatory effect of using criminal history to make housing decisions. If a policy or practice that restricts access to housing on the basis of criminal history has a disparate impact on a protected class (whether or not that effect is intentional), it is in violation of the Fair Housing Act – unless there is a “substantial, legitimate, nondiscriminatory interest” served by the policy.

While it is impossible to know the precise number of people transitioning from a correctional facility at any one point in time, the ability to access safe, secure and affordable housing is critical for a formerly incarcerated person’s reintegration into society. HUD’s guidance is intended to eliminate barriers to securing housing for that population, and jurisdictions can assist by making a clear effort to eliminate any discriminatory barriers these individuals may face. For former inmates to avoid recidivism and work in society, they must have access to housing free of discrimination.

Further, for claims for refusing to make reasonable accommodations for people with disabilities, the HUD memorandum emphasizes that, when the disability of an applicant or tenant contributed to the past criminal conduct, the applicant or tenant may ask for an exception to the criminal background screening policy as a reasonable accommodation.

If the criminal conduct at issue arguably raises concerns about risk of harm to property or other residents, HUD explains that, as part of a reasonable accommodation request, the housing provider should consider any mitigating circumstances that may reduce or eliminate the threat, such as engaging in treatment or therapy.

In April 2024, HUD issued proposed rulemaking to update existing screening regulations for applicants to HUD-assisted housing with conviction histories or a history of involvement with the criminal-legal system. Under current policy, public housing authorities (PHAs) and landlords of HUD-assisted housing have broad discretion in evaluating current and prospective tenants. As a result, some PHAs and landlords have created additional barriers for people with conviction and arrest records in need of stable housing. These barriers can make it exceedingly difficult – and, for some with conviction histories, impossible – to obtain housing. The proposed rule clarified that an arrest record alone may not be used as the basis for denying someone admission to HUD housing. However, an arrest record may be used in conjunction with other evidence of conduct to assess an applicant’s potential success as a tenant. This rulemaking was withdrawn in January 2025.

Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity

On September 21, 2016, HUD published a final rule entitled “Equal Access in Accordance with an Individual’s Gender Identity in CPD programs.” Through this final rule, HUD ensures equal access to individuals in accordance with their gender identity for all HUD funded programs. This rule builds upon the 2012 final rule, “Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity” (2012 Equal Access Rule). This final rule ensures that HUD's housing programs would be open to all eligible individuals and families regardless of sexual orientation, gender identity or marital status.

Furthermore, as HIV/AIDS disproportionately affects the LGBT community, it is important to note that HIV/AIDS is protected under the Fair Housing Act as a disability. HUD specifically states that housing discrimination because of HIV/AIDS is illegal.

The HUD Office of Policy Development and Research conducted a study in 2013, *An Estimate of Housing Discrimination Against Same-Sex Couples*, as the first large-scale, paired-testing study to assess housing discrimination against same-sex couples in metropolitan rental markets via advertisements on the Internet. Two emails were sent out, with the only difference between the two emails was the sexual orientation of the prospective renting couples. The study finds:

“[... same-sex couples experience less favorable treatment than heterosexual couples in the online rental housing market. The primary form of adverse treatment is that same-sex couples receive significantly fewer responses to e-mail inquiries about advertised units than heterosexual couples. Study results in jurisdictions with state-level protections against housing discrimination on the basis of sexual orientation unexpectedly show slightly more adverse treatment of same-sex couples than results in jurisdictions without such protections. “

On January 25, 2021, President Biden signed an Executive Order requiring protections of LGBTQ people in housing, health care, and education. The Executive Order cites the recent Supreme Court decision, *Bostock v. Clayton County*, that held that the prohibition against sex discrimination in the Equal Employment Act prohibits discrimination on the basis of sexual orientation and gender identity. The Executive Order requires the applicable federal agencies, including HUD, to promulgate actions consistent with *Bostock* and the various civil rights laws. This Executive Order, however, was rescinded by President Trump in 2025.

Supreme Court Ruling: *Bostock v. Clayton County, GA* (February 9, 2021):

In *Bostock v. Clayton County, GA*, the U.S. Supreme Court expanded its interpretation of Title VII of the Civil Rights Act of 1964, which prohibits employment discrimination. This law prohibits discrimination on the basis of sex, but not explicitly on the basis of sexual orientation or gender identity. The Court has determined in this decision that Title VII's protection of employees on the basis of sex also protects employees on the basis of sexual orientation and gender identity. Under *Bostock's* reasoning, laws that prohibit sex discrimination — including Title IX of the Education Amendments of 1972, as amended (20 U.S.C. 1681 et seq.), the Fair Housing Act, as amended (42 U.S.C. 3601 et seq.), and section 412 of the Immigration and Nationality Act, as amended (8 U.S.C. 1522), along with their respective implementing regulations — prohibit discrimination on the basis of gender identity or sexual orientation, so long as the laws do not contain sufficient indications to the contrary. HUD's Office of General Counsel issued a memorandum explaining why the Fair Housing Act's prohibition on sex discrimination includes discrimination because of gender identity and sexual orientation and President Biden issued an Executive Order on Executive Order on Preventing and Combating Discrimination on the Basis of Gender Identity or Sexual Orientation in 2021.

Supreme Court Ruling: *Texas Department of Housing and Community Affairs v. Inclusive Communities Project* (June 25, 2015)

On June 25, 2015, the Supreme Court handed down a landmark fair housing ruling that upheld the ability to bring “disparate impact” claims under the Fair Housing Act. The Fair Housing Act of 1968, an integral legislative victory of the Civil Rights Movement, protects people from discrimination when they are renting, buying or securing financing for housing. The case, *Texas Department of Housing and Community Affairs v. Inclusive Communities Project*, centered on the question of whether a policy or action must be intentionally discriminatory, or merely have a discriminatory effect, to qualify as a valid basis for a discrimination claim under the Act.

Inclusive Communities, a Dallas-based non-profit, claimed that the Texas Department of Housing and Community Affairs was guilty of housing discrimination because the way in which the state allocated Low Income Housing Tax Credits perpetuated racial segregation by limiting the development of affordable housing into areas that were historically impoverished with high concentrations of minorities. The state claimed that no discrimination occurred because its intention was not to promote racial segregation but to revitalize these underserved areas by injecting much needed capital for the development of new affordable housing. Inclusive Communities claimed that regardless of intention, the state's decision to fund tax-credit projects

only in minority and poverty-laden neighborhoods resulted in segregation and thus had a discriminatory effect (disparate impact).

Fair housing advocates across the nation watched the case closely and worried if the Supreme Court ruled against disparate impact claims that it would essentially “defang” the Fair Housing Act by removing a key basis for liability. Intent is much harder to prove than effect. In the end the Court ruled 5-4 to uphold the lower court decisions in favor of Inclusive Communities, salvaging fair housing disparate impact claims.

State Fair Housing Protections

The Oklahoma Fair Housing Law (Title 25, article 4A, Section 1451 through article 5, Section 1508) prohibits discrimination in the rental, sales, financing, appraisal, insurance of housing and other housing-related transactions based on the following categories or “protected classes” including race, color, national origin, religion, sex, familial status (including children under the age of 18 living with parents or legal custodians, pregnant women, and people securing custody of children under the age of 18), and handicap (disability). The Oklahoma Fair Housing Law also has “Age” as a “protected class”. The Oklahoma Office of the Attorney General is the state agency empowered to enforce the Oklahoma Fair Housing Law through its Office of Civil Rights Enforcement.

SECTION VI. REVIEW OF THE EXISTING FAIR HOUSING STRUCTURE AND FAIR HOUSING COMPLAINTS

Enforcement and Counseling Agencies

Federal Agencies

U.S. Department of Housing and Urban Development

The U.S. Department of Housing and Urban Development (HUD) oversees, administers, and enforces the federal Fair Housing Act. HUD's regional office in Fort Worth oversees housing, community development, and fair housing enforcement in Arkansas, Louisiana, New Mexico, Oklahoma, and Texas.

Contact information for HUD is listed below:

Address:

Office of Fair Housing and Equal Opportunity
Department of Housing and Urban Development
451 Seventh Street SW, Room 5204
Washington, DC 20410-2000

Telephone: (202) 708-1112 Toll Free: (800) 669-9777

Web Site: <http://www.HUD.gov/offices/fheo/online-complaint.cfm>

The contact information for the regional HUD office in Fort Worth is:

Address

Fort Worth Regional Office of FHEO
U.S. Department of Housing and Urban Development
801 Cherry Street, Unit #45 Suite 2500
Fort Worth, Texas 76102

Telephone: (817) 978-5900 Toll Free: (800) 669-9777 TTY: (817) 978-5595

Website: <http://www.HUD.gov>

State Agencies

State of Oklahoma Attorney General's Office of Civil Rights

Enforcement Violations of Oklahoma's anti-discrimination statute are investigated and prosecuted by the state Attorney General's Office of Civil Rights Enforcement. In the event that the Attorney General's (AG) investigation establishes that there is reasonable cause to believe that a complaint represents a true instance of discrimination, the AG is authorized by statute to file a civil action on behalf of the aggrieved party.

The Office of Civil Rights Enforcement may be contacted through the following information:

Oklahoma Attorney General's Office

Office of Civil Rights Enforcement

15 W. 6th Street, Suite 1000

Tulsa, Okla. 74119

Office: (918) 581-2342

Fax: (918) 938-6348

Email: ocre.complaints@oag.ok.gov

Website: <http://www.oag.ok.gov/civil-rights-enforcement-unit>

Complaint Forms: <http://oag.publishpath.com/Default.aspx?shortcut=civil-rights-enforcement-complaint-forms>

Local Agencies

City of Tulsa Mayor's Office of Resilience and Equity

The City of Tulsa Mayor's Office of Resilience and Equity (MORE) works to achieve equality for all Tulsans through partnership building, education cultural awareness, and advocacy. The office is charged with implementing a broad strategy to promote resilience and equity in Tulsa in all aspects of city life from employment, economic development, health, mental health, and human rights. MORE also oversees the complaint and investigation process for Tulsans who experience discrimination in housing.

MORE may be contacted by telephone at (918) 596-7411 or email at

resilient@cityoftulsa.org

City Hall of Tulsa

175 East 2nd Street 14th Floor

Tulsa, Oklahoma 74103

Nonprofit Organizations

Metropolitan Fair Housing Council of Oklahoma

The Metropolitan Fair Housing Council of Oklahoma (MFHC) is an Oklahoma City-based nonprofit organization that provides fair housing services to Oklahoma residents. Such services include fair housing counseling, investigation and testing, mediation services, and legal and complaint referral. As part of its complaint referral services, the organization facilitates the filing of housing complaints with HUD and serves as an advocate for the complaint throughout the complaint and investigatory process.

The MFHC can be contacted through the following:

Metropolitan Fair Housing Council of Oklahoma, Inc.

312 Northeast 28th Street, Suite 112

Oklahoma City, OK 73105

Toll Free: 1-866-677-7541

Local: (405) 232-3247

FAX: (405) 232-5119

Legal Aid Services of Oklahoma

Legal Aid Services of Oklahoma serves Oklahoma residents as part of their mission to be a “partner in the community making equal justice for all a reality.” A non-profit law firm that provides legal assistance to low-income residents and seniors with civil legal problems, Legal Aid offers a range of services that include assistance to individuals who believe that they have been subject to discrimination in the housing market.

The contact information for the local Tulsa office is as follows:

Legal Aid Services, Tulsa Law Office

907 South Detroit Avenue, Suite 725

Tulsa, Oklahoma

Telephone: (918) 584-3338 or 1 (800) 299-3338

Fax: (918) 584-3060

Tulsa Area Fair Housing Partnership

The Tulsa Area Fair Housing Partnership includes member organizations in the Tulsa area. The mission of the Partnership is to increase the “availability and accessibility of affordable and quality housing for individuals and families” in and around Tulsa, regardless of the race, ethnicity, religion, sex, disability, familial status, or national origin of the person or family seeking housing. The goal of the Partnership is to increase public awareness of fair housing rights, “foster an understanding of why discrimination is harmful”, and to ensure that area residents enjoy their right to fair housing choice.

Current members of the Partnership are as follows:

- Legal Aid Services of Oklahoma, Inc.
- Tulsa Health Department
- Tulsa CARES
- City of Tulsa, Fair Housing Committee
- Greater Tulsa Association of Realtors
- U.S. Department of Housing and Urban Development
- Oklahoma Housing Finance Agency
- Housing Solutions
- Tulsa Housing Authority
- Tulsa Remote
- Green Country Habitat for Humanity
- Spirit Bank
- Tulsa Apartment Association

In service of its mission and goals to promote fair housing choice in the Tulsa area, the Partnership holds housing workshops and seminars throughout the year to “educate the public and industry professionals.”

Complaint Process for Enforcement and Counseling Agencies

U.S. Department of Housing and Urban Development

From a federal perspective, HUD is committed to assist with any problem involving housing discrimination. Complaints filed with HUD are investigated by the Office of FHEO. If the complaint is not successfully conciliated, the FHEO determines whether reasonable cause exists to believe that a discriminatory housing practice has occurred. Anyone who believes their rights have been violated has several options available in which to file a complaint. Those who feel that they have been discriminated against may complete an online complaint form and submit, or write HUD a letter, or simply telephone the HUD office nearest to them. Regardless of the method of contact,

all complaints must be filed on later than one year after an alleged violation. HUD encourages all complaints to be filed it as soon as possible.

The following information was taken directly from HUD's website located at: www.hud.gov and outlines HUD's Fair Housing complaint process.

Required Information by HUD:

- Name and address (Your contact Information)
- The name and address of the person the complaint is against (the respondent)
- The address or other identification to the housing involved
- A short description to the alleged violation (the event that caused you to believe your rights were violated)
- The date(s) of the alleged violation

Contact Information:

Send the Housing Discrimination Complaint form or a letter to the nearest HUD office or call that office directly. For Oklahoma, Arkansas, Louisiana, New Mexico, and Texas:

Fort Worth Regional Office of FHEO
U.S. Department of Housing and Urban Development
801 Cherry Street, Unit #45 Suite 2500
Fort Worth, Texas 76102
Telephone (817) 978-5900; Toll Free 1-800-669-9777
TTY (817) 978-5595

Disabled Contact Information:

HUD also provides a toll-free TTY phone for the hearing impaired: 1-800-927-9275. HUD can provide interpreters along with furnishing tapes and Braille materials as required.

Complaint Process:

HUD will notify you when it receives your complaint. Normally, HUD also will:

- Notify the alleged violator of your complaint and permit that person to submit an answer

- Investigate your complaint and determine whether there is reasonable cause to believe the Fair Housing Act has been violated
- Notify you if it cannot complete an investigation within 100 days of receiving your complaint.

Conciliation

HUD will try to reach an agreement with the person your complaint is against (the respondent). A conciliation agreement must protect both you and the public interest. If an agreement is signed, HUD will take no further action on your complaint. However, if HUD has reasonable cause to believe that a conciliation agreement is breached, HUD will recommend that the Attorney General file suit.

Complaint Referrals

If HUD has determined that your State or local agency has the same fair housing powers as HUD, HUD will refer your complaint to that agency for investigation and notify you of the referral. That agency must begin work on your complaint within 30 days or HUD may take it back.

What if You Need Help Quickly?

If you need immediate help to stop a serious problem that is being caused by a Fair Housing Act violation, HUD may be able to assist you as soon as you file a complaint. HUD may authorize the Attorney General to go to court to seek temporary or preliminary relief, pending the outcome of your complaint, if:

- Irreparable harm is likely to occur without HUD's intervention
- There is substantial evidence that a violation of the Fair Housing Act occurred Example: A builder agrees to sell a house but, after learning the buyer is black, fails to keep the agreement. The buyer files a complaint with HUD. HUD may authorize the Attorney General to go to court to prevent a sale to any other buyer until HUD investigates the complaint.

What Happens after a Complaint Investigation?

If, after investigating your complaint, HUD finds reasonable cause to believe that discrimination occurred, it will inform you. Your case will be heard in an administrative hearing within 120 days,

unless you or the respondent wants the case to be heard in Federal district court. Either way, there is no cost to you.

The Administrative Hearing

If your case goes to an administrative hearing, HUD attorneys will litigate the case on your behalf. You may intervene in the case and be represented by your own attorney if you wish. An Administrative Law Judge (ALA) will consider evidence from you and the respondent. If the ALA decides that discrimination occurred, the respondent can be ordered:

- To compensate you for actual damages, including humiliation, pain and suffering.
- To provide injunctive or other equitable relief, for example, to make the housing available to you.
- To pay the Federal Government a civil penalty to vindicate the public interest. The maximum penalties are \$16,000 for a first violation and \$65,000 for a third violation within seven years.
- To pay reasonable attorney's fees and costs.

Federal District Court

If you or the respondent chooses to have your case decided in Federal District Court, the Attorney General will file a suit and litigate it on your behalf. Like the ALA, the District Court can order relief, and award actual damages, attorney's fees and costs. In addition, the court can award punitive damages.

You May File Suit

You may file suit, at your expense, in Federal District Court or State Court within two years of an alleged violation. If you cannot afford an attorney, the Court may appoint one for you. You may bring suit even after filing a complaint, if you have not signed a conciliation agreement and an Administrative Law Judge has not started a hearing. A court may award actual and punitive damages and attorney's fees and costs.

Other Tools to Combat Housing Discrimination

If there is noncompliance with the order of an Administrative Law Judge, HUD may seek temporary relief, enforcement of the order or a restraining order in a United States Court of Appeals. The Attorney General may file a suit in a Federal District Court if there is reasonable cause to believe a pattern or practice of housing discrimination is occurring.

Oklahoma Attorney General's Office of Civil Rights Enforcement

The Office of Civil Rights Enforcement is empowered by §25-1501 of the Oklahoma Statutes to “receive, investigate, seek to conciliate, hold hearings on, and pass upon complaints alleging violations of [§25-1101 et seq.].” Those who claim to have been subjected to unlawful discrimination in the housing market may file a complaint with the Attorney General within a year after the alleged discriminatory action.

Once the complaint has been filed, the Commission or one of its representatives will notify the person against whom the complaint is directed (the “respondent”) that a complaint has been filed against him or her. The respondent then has ten days to respond to the complaint.

Once a complaint has been lodged with the state AG, the OCRE will conduct an investigation of the facts alleged in the complaint. At the same time, the AG will attempt to bring the parties together in conciliation of the complaint. If the conciliation attempt is successful, the AG will end the investigation.

If there is no conciliation between the parties, the AG will issue its findings on whether or not there is reasonable cause to believe that discrimination has occurred. If the AG finds no such cause, it will dismiss the complaint. If the AG determines that the respondent has committed unlawful discriminatory acts against the complainant, or is about to do so, he or she may file a civil action on behalf of the aggrieved party. In such a civil action, the complainant may be entitled to punitive damages, reasonable attorney’s fees, court costs, and an order enjoining the respondent from continuing the discriminatory policy at issue in the complaint, along with “appropriate affirmatory action.”

Mayor's Office of Resilience and Equity of the City of Tulsa

Tulsa residents who wish to file a housing discrimination complaint with the Tulsa Human Rights Commission must do so within 180 days of the alleged discriminatory act. Complaints are filed with the City Clerk and the Compliance Officer, which is within the Mayor’s Office of Resilience

and Equity (MORE) to oversee the complaint and investigation process regarding the city's anti-discrimination statutes. Once the complaint is filed, the person against whom the complaint is directed is notified of the complaint. He or she may file an answer within ten days of such notification.

Once the complaint has been filed, the Compliance Officer will conduct an investigation to determine whether or not there is probable cause to believe that discrimination has occurred. This investigation must be made within 60 days after the filing of a complaint. If the Compliance Officer finds that there is no cause to believe that discrimination has occurred, he or she will dismiss the complaint. If he or she finds probable cause to believe that discrimination has occurred, the Compliance Officer will notify both the complainant and respondent and attempt to broker a conciliation agreement between the two parties. If a conciliation agreement is not forthcoming, the complaint and results of the investigation may be referred to an appropriate state or federal agency. Alternately, the Compliance Officer may relate the findings of the investigation to the Manager of the Criminal Division of the Legal Department.

The City's website includes the following instructions for filing complaints:

Option 1 - Download the Human Rights complaint form and drop off at the City Clerk's Office

Discrimination Forms:

- Contract Discrimination Form: [PDF](#) | [Spanish PDF](#)
- Housing Discrimination Form: [PDF](#) | [Spanish PDF](#)
- Public Accommodations Form: [PDF](#) | [Spanish PDF](#)

Mail or deliver the completed form to:

Office of the City Clerk
175 E. 2nd St., Suite 260
Tulsa, OK 74103-3223

Option 2 - Call 311 and a customer care representative will complete a short intake form over the phone.

The intake form will automatically be forwarded to MORE, and the appropriate department will reach out to you. Intake forms will automatically be forwarded to our office, and our Compliance Officer will contact you within 48 hours.

Option 3 - Visit 311 online and fill out a short intake form

Visit [Tulsa311 online](#). You will be prompted to log-in to Tulsa311 or create an account. A Compliance Officer will contact you within 48 hours of submission.

Metropolitan Fair Housing Council of Oklahoma

When a fair housing complaint is lodged with the Metropolitan Fair Housing Council (MFHC), the organization initiates the complaint referral process by conducting a screening interview, gathering case notes, and entering details of the allegation into a database. After gathering supporting documentation and respondent information, MFHC's Fair Housing staff will conduct a case review to determine whether or not the complaint has standing.

If the organization determines that the complaint does not represent a bona fide allegation, it will refer the matter for landlord/tenant counseling or to other available resources. In the event that the Fair Housing staff determines that a complaint amounts to a bona fide fair housing allegation, it will hold a case review with the Executive Director, the Enforcement Staff, and/or the MFHC General Council to decide on an appropriate follow-up action.

Follow up actions potentially include a request for reasonable accommodation or reasonable modification for a complainant with a disability, fair housing testing, referral of the matter to Legal Aid or a cooperating attorney, and the filing of an administrative complaint with HUD. In the latter case, the MFHC will continue to serve as an advocate for the complainant during the HUD administrative process.

A request for reasonable accommodation or modification, if successful, can lead to the closure of the complaint. If the request is not successful, the matter will be referred to HUD after a final case review by MFHC. Complaints that are referred to for fair housing testing will also be reviewed by MFHC and referred to HUD. Complaints that are referred to Legal Aid or a cooperating attorney may be resolved, or may end in a lawsuit, trial, and/or settlement.

Fair Housing Complaints

The City collected fair housing complaint data from HUD and local agencies. The information received is summarized below. It should be noted that based on the information received, the City cannot fully assess the extent to which this data duplicates complaints.

U.S. Department of Housing and Urban Development

Analysis of HUD fair housing complaints cases filed, pending, and/or resolved or closed, from July 1, 2023 through June 30, 2024 from residents of the City of Tulsa reveals that 48 complaints met the aforementioned criteria, with some complaints citing multiple bases for their claims.

The analysis further revealed that disability followed by familial status are by far the most cited bases for complaints with disability cited in 50% of the bases across all complaints and familial status cited at a rate of about 27.1%. Other bases cited include race (14.6%), retaliation (14.5%), sex (14.5%), national origin (4.2%), and color (4.2%). Table 44 below shows how many times each basis was cited and in what year each was filed between 2021 and 2024.

Table 44: HUD Fair Housing Complaints - Number of Times Basis for Complaint was Cited per Year, 2021- 2024

Basis for Complaint	2021	2022	2023	2024	TOTAL
Race	0	1	4	2	7
Disability	1	3	15	5	24
National Origin	0	1	1	0	2
Sex	0	0	4	3	7
Familial Status	0	2	9	2	13
Retaliation	0	0	5	2	7
Color	0	1	1	0	2

Among disability complaints, 18 of the 24 complaints (75%) cited failure to make reasonable accommodation as a basis for their complaint.

Of the 27 complaints resolved or closed between July 1, 2023 and June 30, 2024, 10 (37%) were closed with conciliation or a successful settlement. The remainder were either withdrawn, had a non-responsive or uncooperative complainant, dismissed for lack of jurisdiction, or a no cause determination.

City of Tulsa

The City of Tulsa's Mayor's Office of Resilience and Equity (MORE) received four complaints between July 1, 2023 through June 30, 2024. These complaints and their outcomes were reported in this past year's annual CAPER. A summary of the complaints is described in Table

45 below. As shown in the summaries, only one out of the four complaints received alleged discrimination, although the basis for the discrimination was not specified.

Table 45: City Fair Housing Complaints - Number and Basis Cited per Year, 2023- 2024

Outcome	Basis of Complaints
Referred to Tulsa Housing Authority	Tenant concerns of rent increase without advanced notice
Referred to Tulsa Housing Authority	Tenant concerned about possible termination of housing voucher
Referred to Working In Neighborhoods Dept.	Homeowner concerned about application process for home repairs
Resolved via mediation	Tenant states discrimination concerns from landlord

SECTION VII. FAIR HOUSING IN THE PRIVATE SECTOR

Rental Housing Market

Advertising

Legally, applicants for rental units only need to demonstrate their ability to pay rent. Whether the applicants intend to pay with wages/salaries, savings, inheritance, or insurance should not matter to the landlord. Requiring proof of income may be misleading as requiring proof of employment.

Under Oklahoma's fair housing law, source of income is a protected class. This includes, but is not limited to, the Section 8 voucher/HCV program, the HUD-VASH program, Homelessness Prevention and Rapid Re-Housing programs, Housing Opportunities for Persons with AIDS, and security deposit assistance programs that help people afford their rent. The law also protects the use of subsidy programs created by cities, counties, and public agencies to address growing homelessness. The law also protects people from source of income discrimination in housing other than rental housing. Therefore, a rental ad that states Section 8 or any other rental subsidy is not accepted is discriminatory.

As with real estate advertising, advertisements for rental units can be published in other languages. However, by law an English version of the ad must also be published.

Responding to Ads

Differential treatment of those responding to advertisements is a growing fair housing concern. Testing is a method of determining whether landlord practices are discriminatory against those with protected characteristics. By responding to online rental listings using names associated with a particular racial/ethnic group and varying message content grammatically to indicate differing levels of education and/or income (i.e. social class), testing may review discriminatory practices.

Viewing the Unit

Viewing the unit is the most obvious place where the potential renters may encounter discrimination because landlords or managers may discriminate based on race or disability, or judge on appearance whether a potential renter is reliable or may violate any of the rules.

Fair Housing testing programs look for both overt and subtle discrimination. Subtle discrimination is unequal treatment between groups that occurs but is difficult to quantify and may not always be identifiable through common measures such as price differences. As an example, subtle discrimination occurs when landlords reply faster and with longer messages to inquiries made from names typically perceived to be white applicants.

Credit/Income Check

Landlords may ask potential renters to provide credit references, lists of previous addresses and landlords, and employment history/salary. The criteria for tenant selection, if any, are typically not known to those seeking to rent. Many landlords often use credit history, criminal background, and eviction history as excuses when trying to exclude certain groups. Legislation provides for applicants to receive a copy of the report used to evaluate applications.

The Lease

Typically, the lease or rental agreement is a standard form completed for all units within the same building. However, the enforcement of the rules contained in the lease or agreement may not be standard for all tenants. A landlord may choose to strictly enforce the rules for certain tenants based on arbitrary factors, such as race, presence of children, or disability.

During the Tenancy

During tenancy, the most common forms of discrimination a tenant may face are based on familial status, race, national origin, sex, or disability. Usually this type of discrimination appears in the form of varying enforcement of rules, overly strict rules for children, excessive occupancy standards, refusal to make a reasonable accommodation for handicapped access, refusal to make necessary repairs, eviction notices, illegal entry, rent increases, or harassment. These actions may be used as a way to force undesirable tenants to move on their own without the landlord having to make an eviction.

National Association of Residential Property Managers (NARPM)

The National Association of Residential Property Managers promotes a high standard of property management business ethics, professionalism and fair housing practices within the residential property management field. NARPM is an association of real estate professionals who are experienced in managing single-family and small residential properties. Members of the association adhere to a strict Code of Ethics to meet the needs of the community, which include the following duties:

1. Protect the public from fraud, misrepresentation, and unethical practices of property managers.
2. Adhere to the Federal Fair Housing statutes.
3. Protect the fiduciary relationship of the client.
4. Treat all tenants professionally and ethically.
5. Manage the property in accordance with the safety and habitability standards of the community.
6. Hold all funds received in compliance with state law with full disclosure to the client.

NARPM offers four designations to qualified property managers and property management firms and various educational courses as part of attaining these designations.

Homeownership Market

The following discussions describe the process of homebuying and likely situations when a person/household may encounter housing discrimination. However, much of this process occurs in the private housing market over which local jurisdictions have little control or authority to regulate. The recourse lies in the ability of the contracted fair housing service providers in monitoring these activities, identifying the perpetrators, and taking appropriate reconciliation or legal actions.

Advertising

The first thing a potential buyer is likely to do when they consider buying a home is search advertisements either in magazines, newspapers, or the internet to get a feel for what the market offers. Advertisements cannot include discriminatory references such as the use of words describing:

1. Current or potential residents;
2. Neighbors or the neighborhood in racial or ethnic terms;
3. Adults preferred (except for senior or active adult living);
4. Perfect for empty nesters;
5. Conveniently located by a Catholic Church; or
6. Ideal for married couples without kids.

Previous litigation has set precedence for violations in advertisements that hold publishers, newspapers, Multiple Listing Services, real estate agents, and brokers accountable for discriminatory ads.

Lending

Initially, buyers must find a lender that will qualify them for a loan. This part of the process entails an application, credit check, ability to repay, amount eligible for, choosing the type and terms of the loan, etc. Applicants are requested to provide a lot of sensitive information including their gender, ethnicity, income level, age, and familial status. Most of this information is used for reporting purposes required of lenders by the Community Reinvestment Act (CRA) and the Home Mortgage Disclosure Act (HMDA). Chapter 5 of this report provides detailed analysis of HMDA data for the City.

Appraisals

Banks order appraisal reports to determine whether or not a property is worth the amount of the loan they will be giving. Generally speaking, appraisals are based on the comparable sales of properties within the neighborhood of the property being appraised. Other factors are taken into consideration, such as the age of the structure, any improvements made, location, general economic influences, etc.

Real Estate Agents

Real estate professionals may act as agents of discrimination. Some unintentionally, or possibly intentionally, may steer a potential buyer to particular neighborhoods by encouraging the buyer to look into certain areas; others may choose not to show the buyer all choices available. Agents may also discriminate by who they agree to represent, who they turn away, and the comments they make about their clients.

Homeowners Insurance Industry

Without insurance, banks and other financial institutions lend less. For example, if a company excludes older homes from coverage, lower income and minority households who can only afford to buy in older neighborhoods may be disproportionately affected. Another example includes private mortgage insurance (PMI). PMI obtained by applicants from Community Reinvestment Act (CRA) protected neighborhoods is known to reduce lender risk. Redlining of lower income and minority neighborhoods can occur if otherwise qualified applicants are denied or encouraged to obtain PMI.

National Association of REALTORS® (NAR)

The National Association of REALTORS® (NAR) has developed a Fair Housing Program to provide resources and guidance to REALTORS® in ensuring equal professional services for all people. The term REALTOR® identifies a licensed professional in real estate who is a member of the NAR; however, not all licensed real estate brokers and salespersons are members of the NAR.

Code of Ethics

Article 10 of the NAR Code of Ethics provides that “REALTORS® shall not deny equal professional services to any person for reasons of race, color, religion, sex, handicap, familial status, or national origin. REALTORS® shall not be a party to any plan or agreement to discriminate against any person or persons on the basis of race, color, religion, sex, disability, familial status, national origin, sexual orientation, or gender identity.

Additionally, Standard of Practice Article 10-1 states that “REALTORS® shall not volunteer information regarding the racial, religious or ethnic composition of any neighborhood and shall not engage in any activity which may result in panic selling. REALTORS® shall not print, display or circulate any statement or advertisement with respect to the selling or renting of a property that indicates any preference, limitations or discrimination based on race, color, religion, sex, disability, familial status, national origin, sexual orientation, or gender identity.

Diversity Certification

NAR has created a diversity certification, “At Home with Diversity: One America” to be granted to licensed real estate professionals who meet eligibility requirements and complete the NAR “At Home with Diversity” course. The certification will signal to customers that the real estate

professional has been trained on working with diversity in today's real estate markets. The coursework provides valuable business planning tools to assist real estate professionals in reaching out and marketing to a diverse housing market. The NAR course focuses on diversity awareness, building cross-cultural skills, and developing a business diversity plan.

Lending Analysis

Statewide lending practices were analyzed using data gathered from lending institutions in compliance with the Home Mortgage Disclosure Act (HMDA). The HMDA was enacted by Congress in 1975 and is implemented by the Federal Reserve Board as Regulation C. The intent of the Act is to provide the public with information related to financial institution lending practices and to aid public officials in targeting public capital investments to attract additional private sector investments.

Since enactment of the HMDA in 1975, lending institutions have been required to collect and publicly disclose data regarding applicants including: location of the loan (by Census tract, state, and MSA); income, race and gender of the borrower; the number and dollar amount of each loan; property type; loan type; loan purpose; whether the property is owner-occupied; action taken for each application; and, if the application was denied, the reason(s) for denial. Property types examined include one-to-four family units, manufactured housing and multi-family developments.

HMDA data is a useful tool in accessing lending practices and trends within a jurisdiction. While many financial institutions are required to report loan activities, it is important to note that not all institutions are required to participate. Depository lending institutions – banks, credit unions, and savings associations – must file under HMDA if they hold assets exceeding the coverage threshold set annually by the Federal Reserve Board; have a home or branch office in one or more metropolitan statistical areas (MSA); or originated at least one home purchase or refinancing loan on a one-to-four family dwelling in the preceding calendar year. Such institutions must also file if they meet any one of the following three conditions: status as a federally insured or regulated institution; originator of a mortgage loan that is insured, guaranteed, or supplemented by a federal agency; or originator of a loan intended for sale to Fannie Mae or Freddie Mac. For-profit, non-depository institutions (such as mortgage companies) must file HMDA data if: 1) the value of the home purchase or refinancing loans exceeds 10 percent of their total loan originations or equals or exceeds \$25 million; 2) they either maintain a home or branch office in one or more MSAs or in a given year execute five or more home purchase, home refinancing, or home improvement loan applications, originations, or loan purchases for

properties located in MSAs; or 3) they hold assets exceeding \$10 million or have executed more than 100 home purchase or refinancing loan originations in the preceding calendar year.

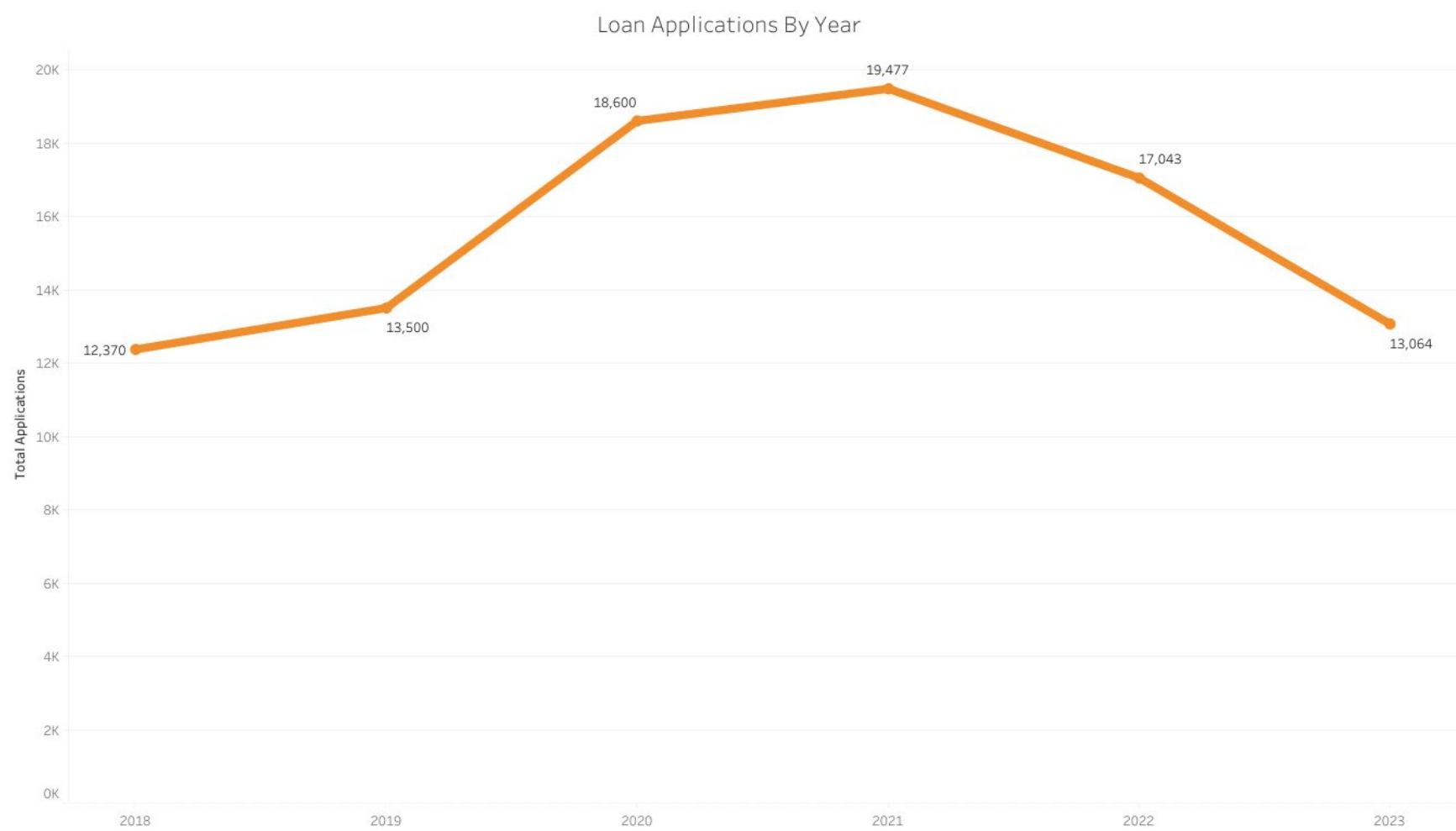
It is recommended that the analysis of HMDA data be tempered by the knowledge that no one characteristic can be considered in isolation but must be considered in light of other factors. For instance, while it is possible to develop conclusions simply based on race data, it is more accurate when all possible factors are considered, particularly in relation to loan denials and loan pricing. According to the Federal Financial Institutions Examination Council (FFIEC), “with few exceptions, controlling for borrower-related factors reduces the differences among racial and ethnic groups.” Borrower-related factors include income, loan amount, lender, and other relevant information included in the HMDA data.

The following analysis is provided for the Tulsa City summarizing 2023 HMDA data (and data between 2018 and 2023) where applicable. When specific details are included in the HMDA records, a summary is provided below for loan denials, including information regarding the purpose of the loan application; race of the applicant; and the primary reason for denial. For the purposes of analysis, this report will focus only on the information available and will not make assumptions regarding data that is not available or was not provided as part of the mortgage application or in the HMDA reporting process.

2023 Overview

In 2023, there were approximately 13,064 applications within Tulsa City for home loans to purchase, refinance or make home improvements for a single-family home (not including manufactured homes).

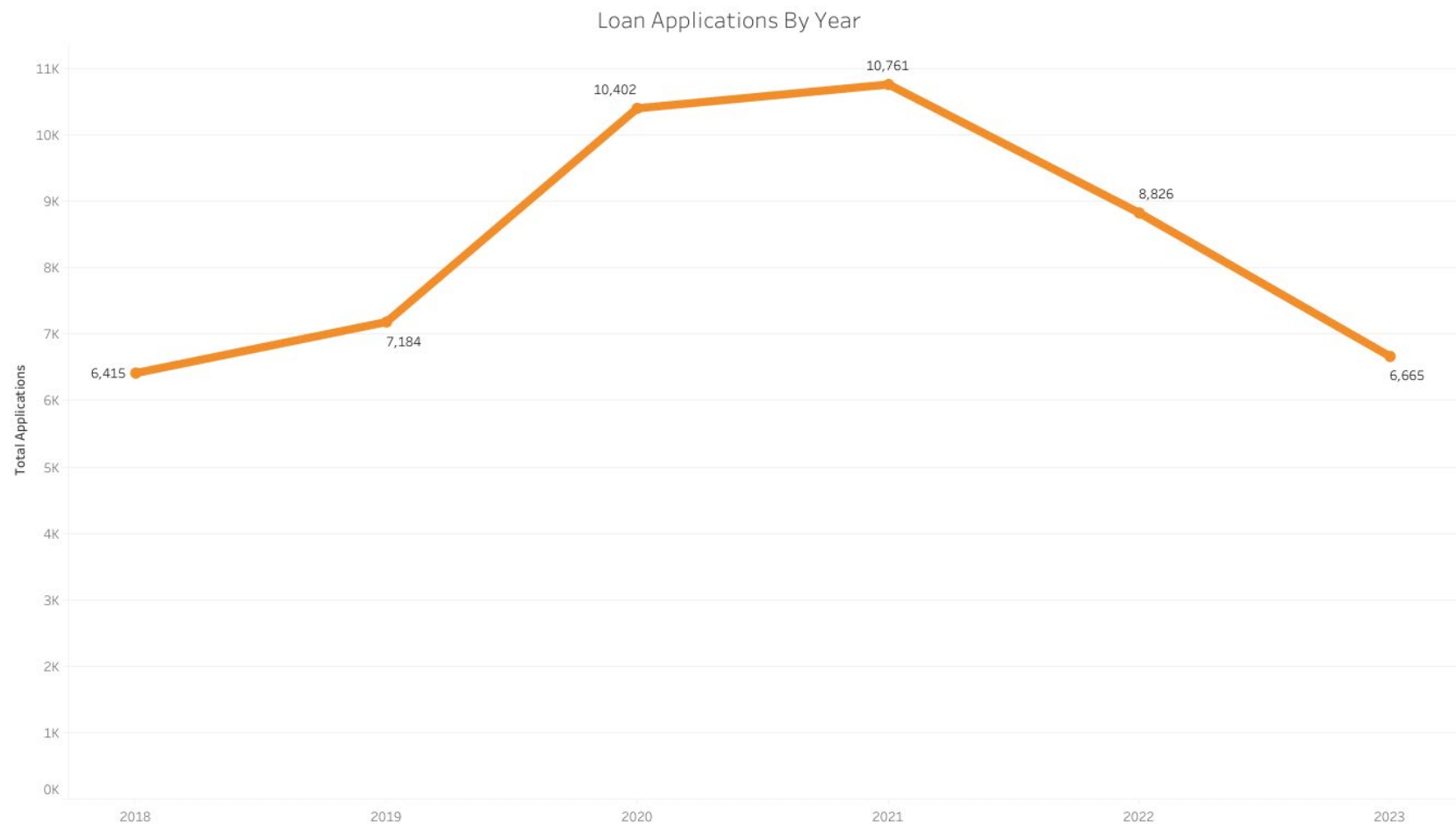
Figure 63: Loan Applications by Year, 2018- 2023



Source: 2018-2023 HMDA: Total Applications

Of those applications, nearly 6,665 (51%) were approved and originated. This represents a decline from prior years – the peaks were 2020 and 2021. The number of loan applications declined to approximately 33% from its peak in 2021. The loan originations have declined by 38% in 2023 from the peak in 2021.

Figure 64: Loan Originations by Year, 2018- 2023



Source: 2018-2023 HMDA: Loan Originations

Of the remaining 6,399 applications, approximately 1,955 (30%) of all applications were denied. The top three application denial reasons within the city were debt-to-income ratio (33.18%), Credit History (27.09%) and Collateral (14.56%), representing about 75% of the city's total denials. It is important to note that financial institutions are not required to report reasons for loan denials, although many do so voluntarily. Also, while many loan applications are denied for more than one reason, HMDA data reflects only the primary reason for the denial of each loan. The balance of the approximately 4,444 applications that were not originated or denied were closed for one reason or another, including: 1) the loan was approved but not accepted by the borrower; 2) the application was closed because of incomplete information or inactivity by the borrower; or 3) in many instances the application may have been withdrawn by the applicant.

Table: 46: Disposition of Application by Loan Type and Purpose, 2023

Single Family Homes (excluding manufactured homes)

	Loan Type	Home Purchase	Refinance	Home Improvement
Total Applications				
	Conventional	5,962	1,620	1,762
	FHA	1,609	538	17
	RHS/FSA	13	0	0
	VA	535	251	2
Loan Originated				
	Conventional	3,383	772	848
	FHA	723	162	3
	RHS/FSA	5	0	0
	VA	257	79	0
Application approved but not accepted				
	Conventional	204	71	86
	FHA	32	14	0
	RHS/FSA	0	0	0
	VA	8	6	0
Application Denied				
	Conventional	285	294	605
	FHA	68	144	3
	RHS/FSA	1	0	0
	VA	22	57	0
Application withdrawn by applicant				
	Conventional	848	251	138
	FHA	224	114	5
	RHS/FSA	2	0	0
	VA	85	60	1
File closed for incompleteness				
	Conventional	72	101	70
	FHA	18	54	1
	RHS/FSA	0	0	0
	VA	3	27	1

Source: 2023 HMDA

A further examination of 1,955 denials within Tulsa City during 2023 indicates that approximately 31.57% were applicants seeking to do Home Improvement, 19.19% Home Purchase, and 17.32% for Refinance on existing mortgages for owner-occupied, primary residences.

Table 47: Denial Reasons by Loan Type, 2023

Single Family Homes (excluding manufactured homes)

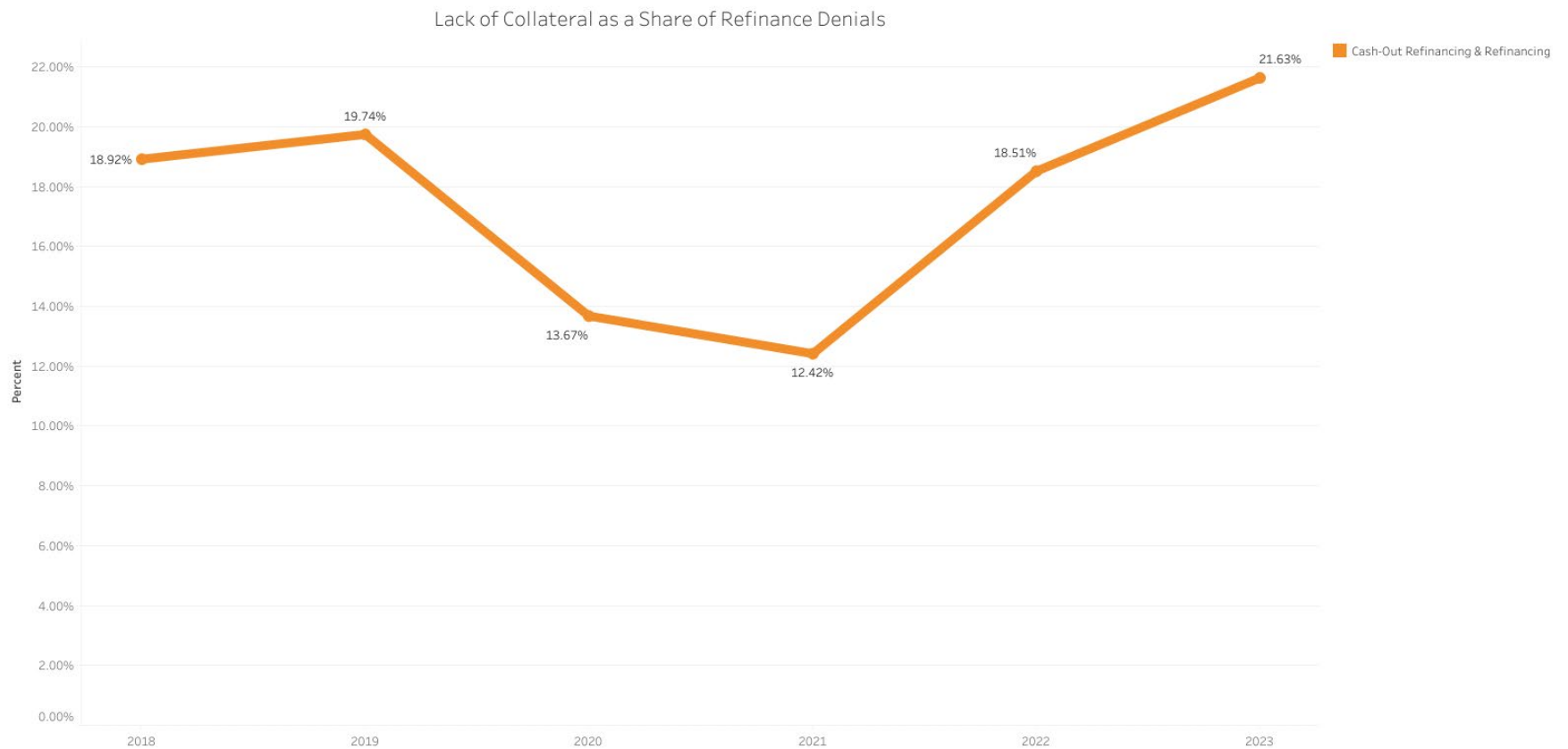
<u>Denial Reason Desc</u>	<u>Cash-Out Refinancing</u>	<u>Home Improvement</u>	<u>Home Purchase</u>	<u>Other Purpose</u>	<u>Refinancing</u>	<u>Total</u>	<u>%</u>
Collateral	82	64	65	45	24	280	14.56%
Credit Application Incomplete	31	18	20	46	16	131	6.81%
Credit History	88	197	56	146	34	521	27.09%
Debt-to-Income Ratio	79	222	130	157	50	638	33.18%
Employment History	7	14	12	10	2	45	2.34%
Insufficient Cash	4		23		3	30	1.56%
Other	27	58	32	51	11	179	9.31%
Unverifiable Information	15	34	31	13	6	99	5.15%
Total	333	607	369	468	146	1,923	
%	17.32%	31.57%	19.19%	24.34%	7.59%		

Source: 2023 HMDA

The top three application denial reasons within the city were debt-to-income ratio (33.18%), Credit History (27.09%) and Collateral (14.56%), representing about 75% of the city's total denials.

Typically, homeowners seeking to refinance their existing home mortgage can use their home as collateral. When the denial reason given for a refinance is a lack of collateral, this could indicate the home is worth less than the existing mortgage and, therefore, refinancing is not an option. These homes are commonly referred to as “under-water” or the borrowers are “upside-down” in their mortgage. Shown in Figure 65 below, the lack of collateral as a share of refinance denials has increased since the peak of the housing crisis, suggesting that the number of “under-water” homes in Tulsa City are increasing.

Figure 65: Lack of Collateral as a Share of Refinance Denials, 2018- 2023



Source: 2018-2023 HMDA

Home Purchase Lending in Tulsa City

Of the 987 home purchase loans for single family homes that originated in 2023, approximately 57% were provided by conventional lenders, lower than the national conventional home purchase share of 73%. The remaining 33% of home purchase loans in Tulsa City were provided by federally backed sources such as the Federal Housing Administration (FHA), and the Department of Veterans Affairs (VA). Non-conventional loans have relatively lower down-payment requirements in comparison to conventional lenders.

Table 48: Home Purchases by Type, 2023

	<i>Originations</i>	<i>Share of Total</i>	<i>Approval Rate</i>
<i>Conventional</i>	5,675	72.94%	59.61%
<i>FHA</i>	1,573	20.22%	45.96%
<i>RHS/FSA</i>	11	0.14%	45.45%
<i>VA</i>	521	6.70%	49.33%
<i>Total</i>	7,780		

Source: 2023 HMDA

The share of applications and percentage of loan application denials for traditional home purchase loans in Tulsa City varies by race/ethnic groups. The largest applicant group in 2023 were White (45%) followed by Other Races (34%) and Hispanics (12%). The lowest applications were from Black Population at 6.84% and Asians at 3.09%.

Whites were least likely to be denied for conventional single-family home purchases at a rate of 14.75%. The Blacks and Hispanics had a highest denial rate of 23.60% and 21.18%.

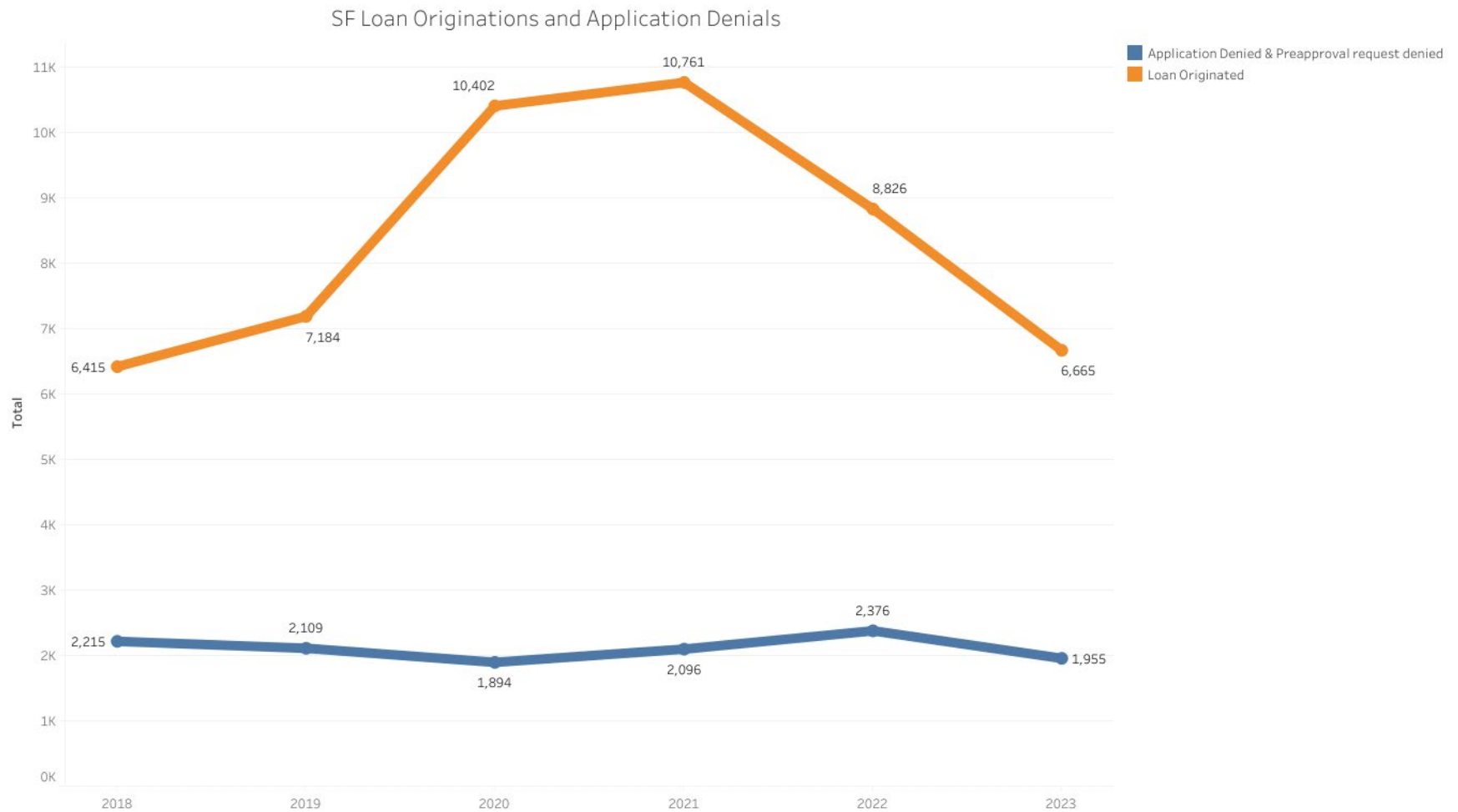
Tulsa's Single-Family Lending Market, 2018-2023

The following section will examine HMDA data for Tulsa City between 2018-2023.

Highlighted in Figure 66 below, the number of single-family loan originations in Tulsa City followed a dynamic, though broadly downward trajectory between 2018-2023. At the onset of the housing boom due to low interest rates, originations increased at a rate of 67.74% between 2018 and 2021, followed by a decrease of 17.9% between peak of 2021 to 2022 and further decrease of 24.5% between 2022 and 2023. 2023 originations are lower than 2018. The decrease was due to higher interest rates.

In contrast to originations, the number of application denials within Tulsa City demonstrated similar behavior. In 2020 and 2021, the denial rate was about 10%. In 2022 and 2023 as loan originations decreased, the application denials increased to 14% and 15%.

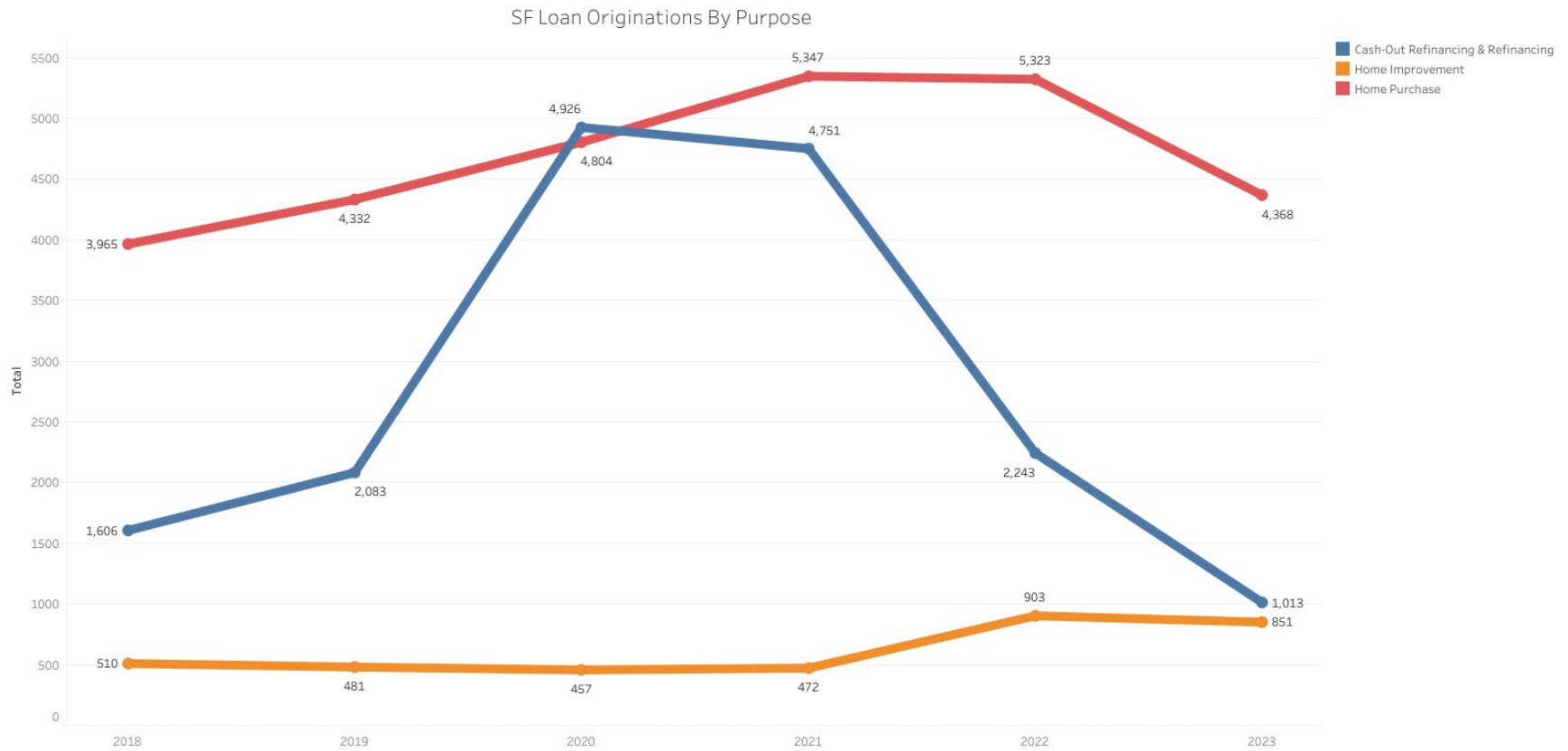
Figure 66: Single-Family Loan Originations and Application Denials, 2018- 2023



Source: 2018-2023 HMDA

Shown in Figure 67 below, much of the year-to-year fluctuations in total originations that occurred between 2018 and 2023 were the result of refinancing originations. Refinancing was the dominant loan for all years examined with the exceptions of 2022 and 2023. Refinance loans grew significantly between 2018 and 2021 as interest rates were broadly low (discussed further below). In 2021 the US 30 YR conventional loans were around 3% and gradually increased to 7% in mid-2023. As of 2023, home purchases and refinances comprised 65.54% and 15.20% of the city's total originations respectively. Home purchases have steadily declined in 2022 and 2023.

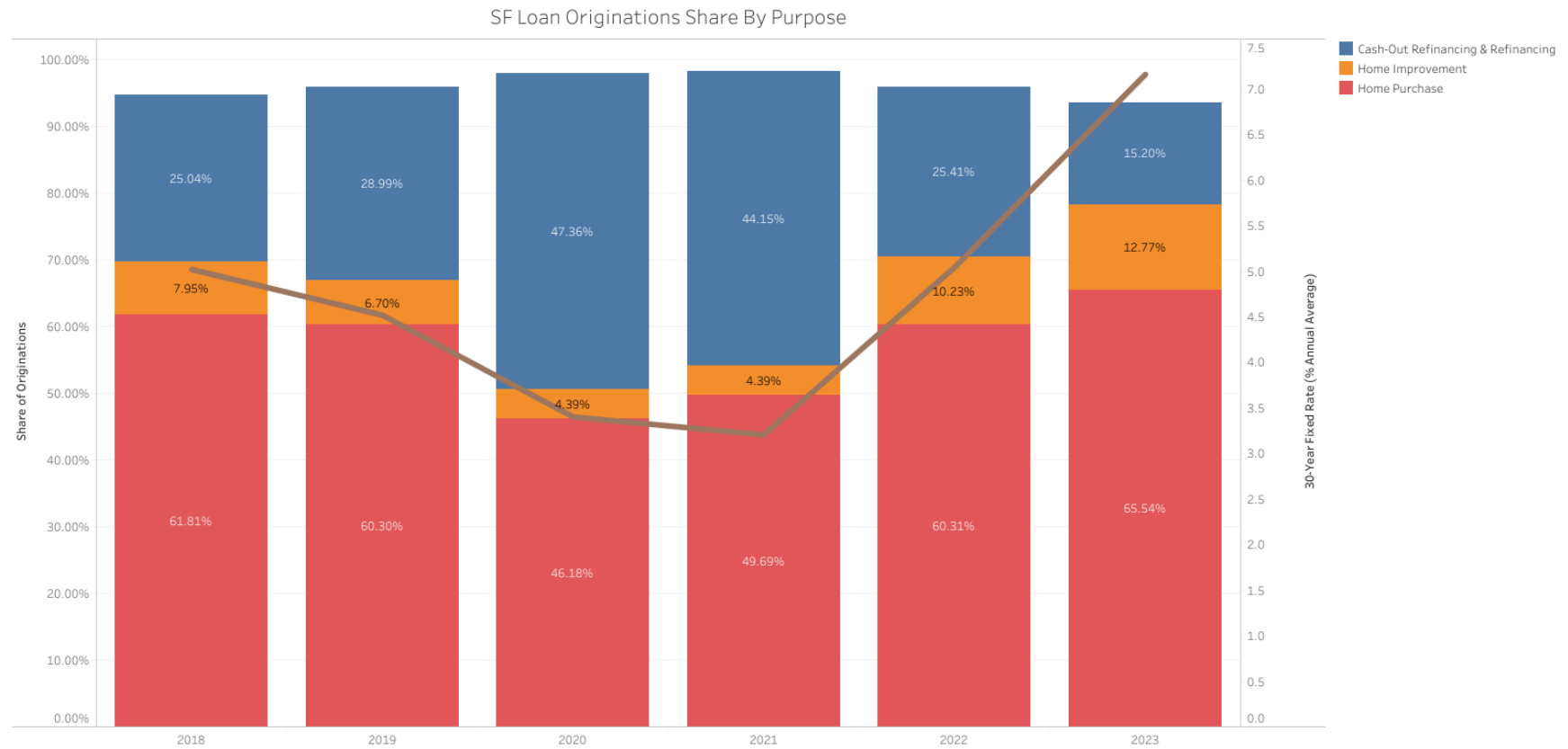
Figure 67: Single-Family Loan Origination by Purpose, 2018- 2023



Source: 2018-2023 HMDA

The share of refinance originations in Tulsa City appears to move generally with the 30-year fixed rate mortgage average (shown in Figure 68 below). For example, in 2020/2021 when the average 30-year fixed rate mortgage was at its lowest level of all the years examined, refinance originations reached the highest share in absolute and percentage terms of all data years analyzed. Similarly, when interest rates rose between 2022/2023, the share of refinance originations fell from 47.36% in 2020 to 15.20% in 2023. The annual average of the 30-year fixed mortgage rate between 2018 and 2023 is consistent with Tulsa city's reduction in the number of refinance loan originations over the same time.

Figure 68: Single-Family Loan Originations Share by Purpose, 2018- 2023



Source: TBD: 2018-2023 HMDA

Income, Race, and Single-Family Loan Denials in Tulsa

Denial rates for single-family loans in Tulsa City over time vary by race and ethnicity. The charts in Figures 69- 71 below indicate that between 2018 and 2023, White applicants were less likely to be denied relative to Blacks and Hispanics. Additionally, Black and Hispanic applicants were the most likely to be denied relative to other groups for all years analyzed. In addition to the overall denial rate, this pattern is evident in both home purchase and refinance loans.

Figure 69: Single-Family Denial Rate by Race/ Ethnicity, Overall, 2018- 2023

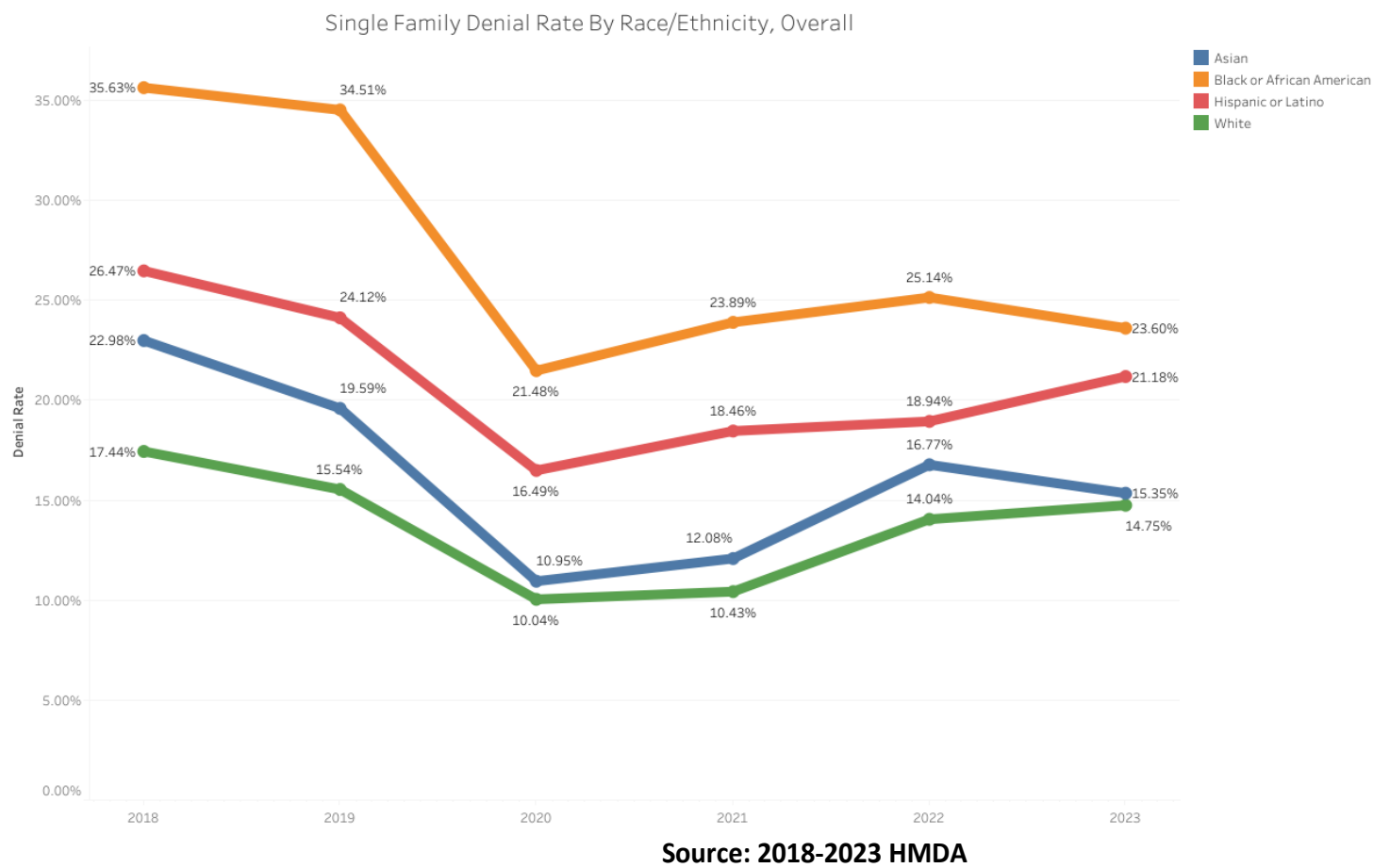
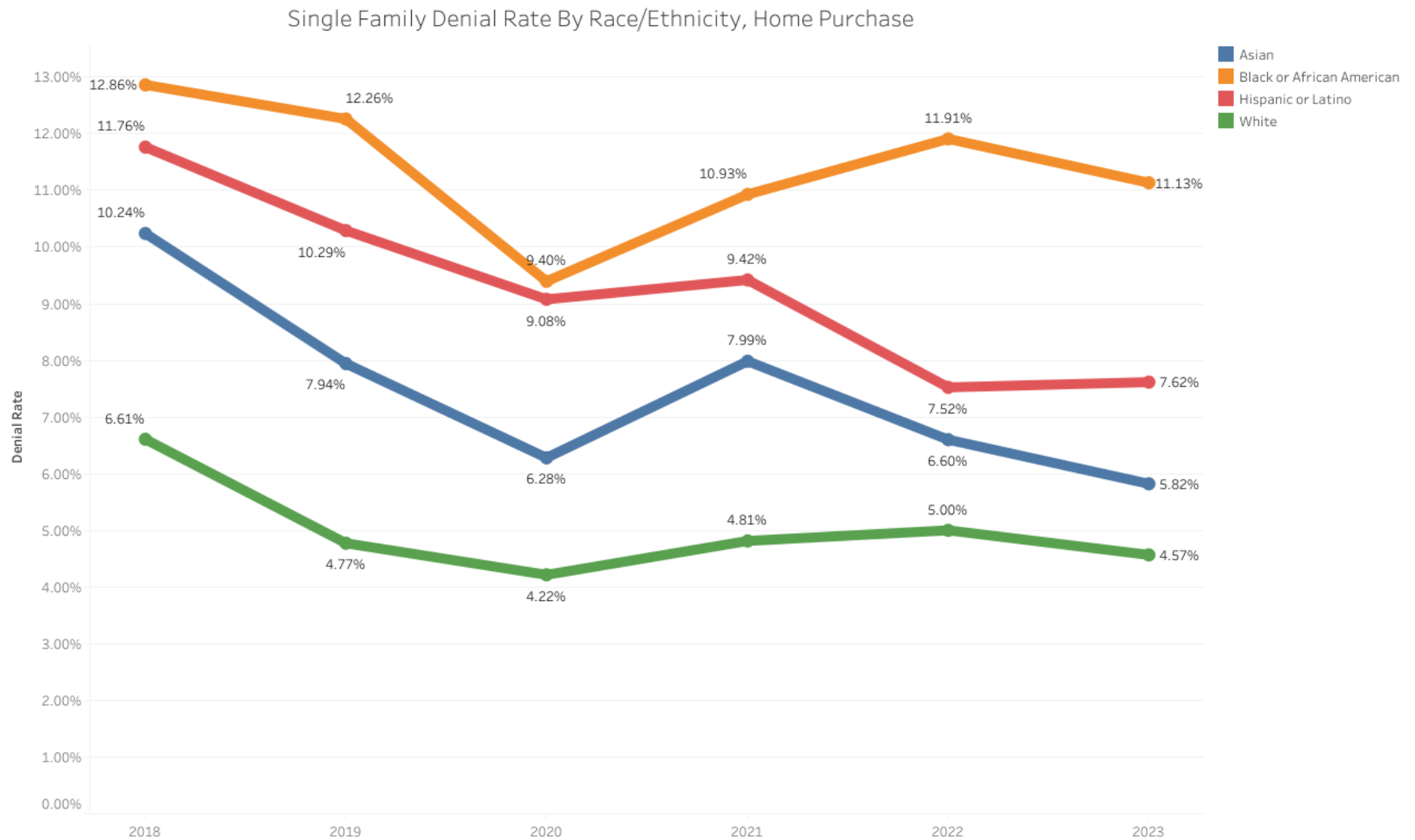
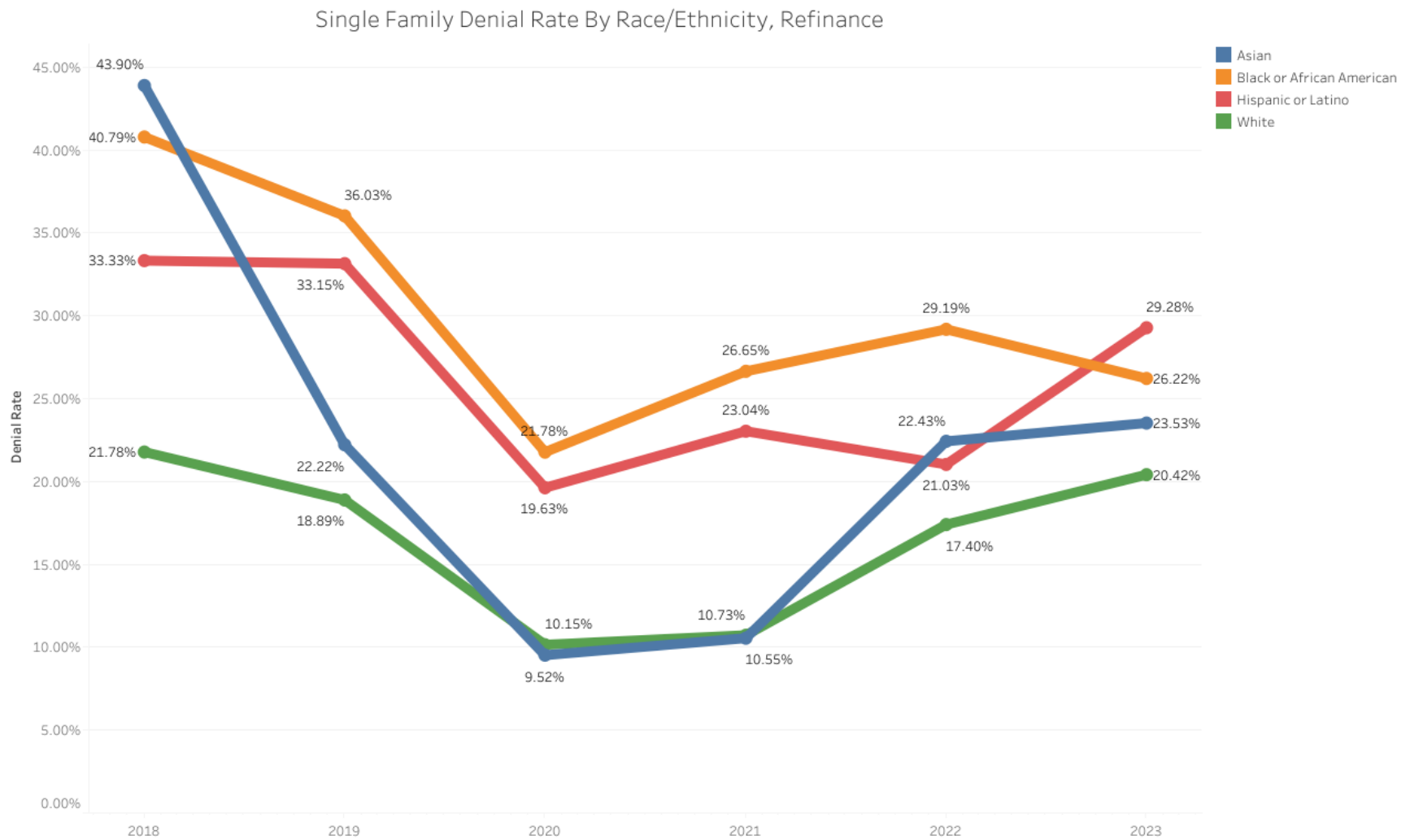


Figure 70: Single Family Denial Rate by Race/ Ethnicity, Home Purchase, 2018- 2023



Source: 2018-2023 HMDA

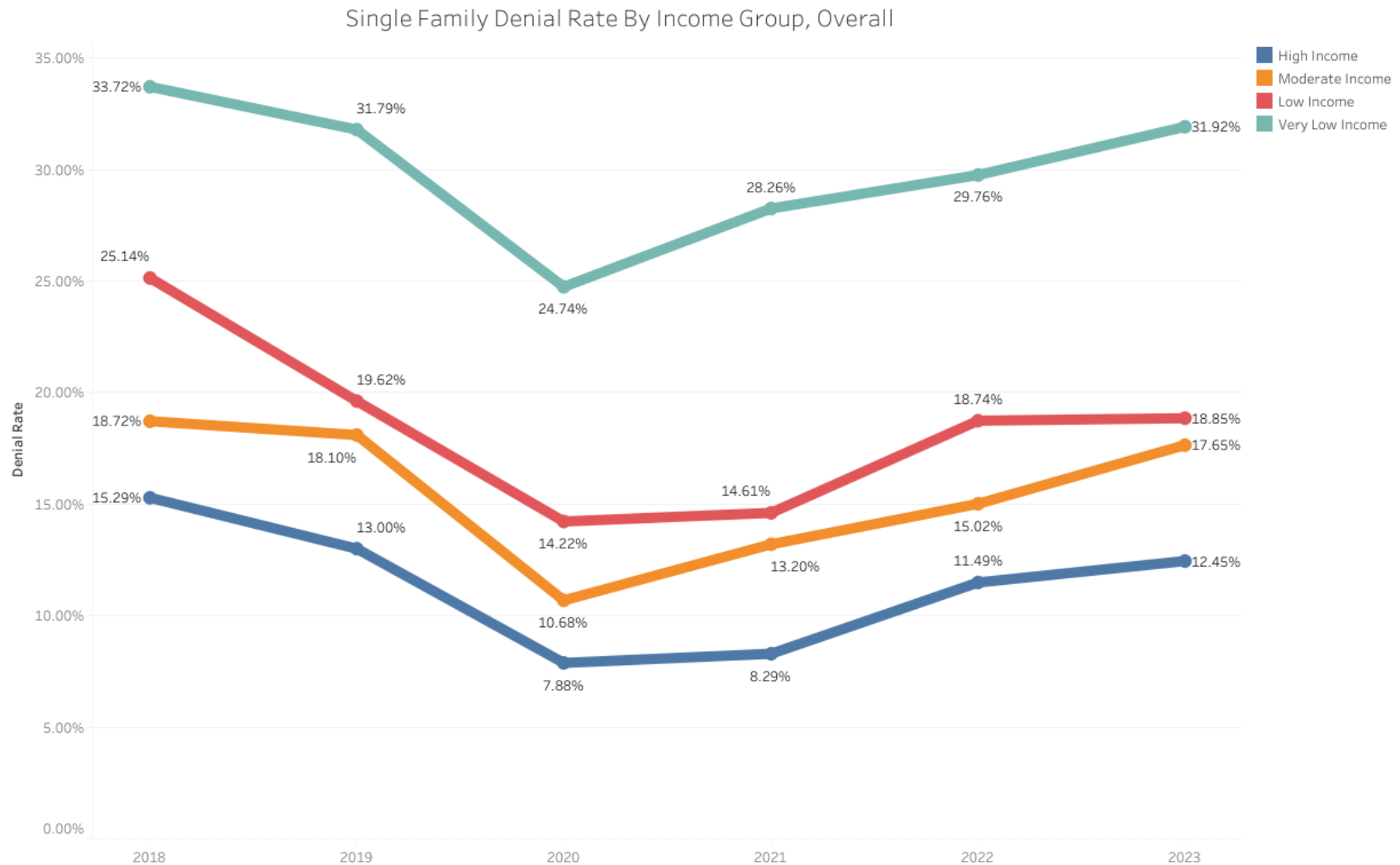
Figure 71: Single Family Denial Rate by Race/ Ethnicity, Refinance, 2018- 2023



Source: 2018-2023 HMDA

A view of single-family denial rates by applicant income group within Tulsa City (highlighted below) shows the expected outcome of higher income groups experiencing lower denial rates than lower income groups. The denials across all income groups have risen since lows of 2020/2021 due to higher interest rates and stagnant wages. However, the percentage of denials in 2023 by income group has risen with very Low-Income applicants (50% or less of Area Median Income) at 31.92% compared to 12.45% for High Income groups. The variation in the denial rates is considerably higher for lower income groups – while the high-income group denial changed from 7.88% in 2020 to 12.45% from 2020 to 2023, the very low-income group went from 24.74% to 31.92%.

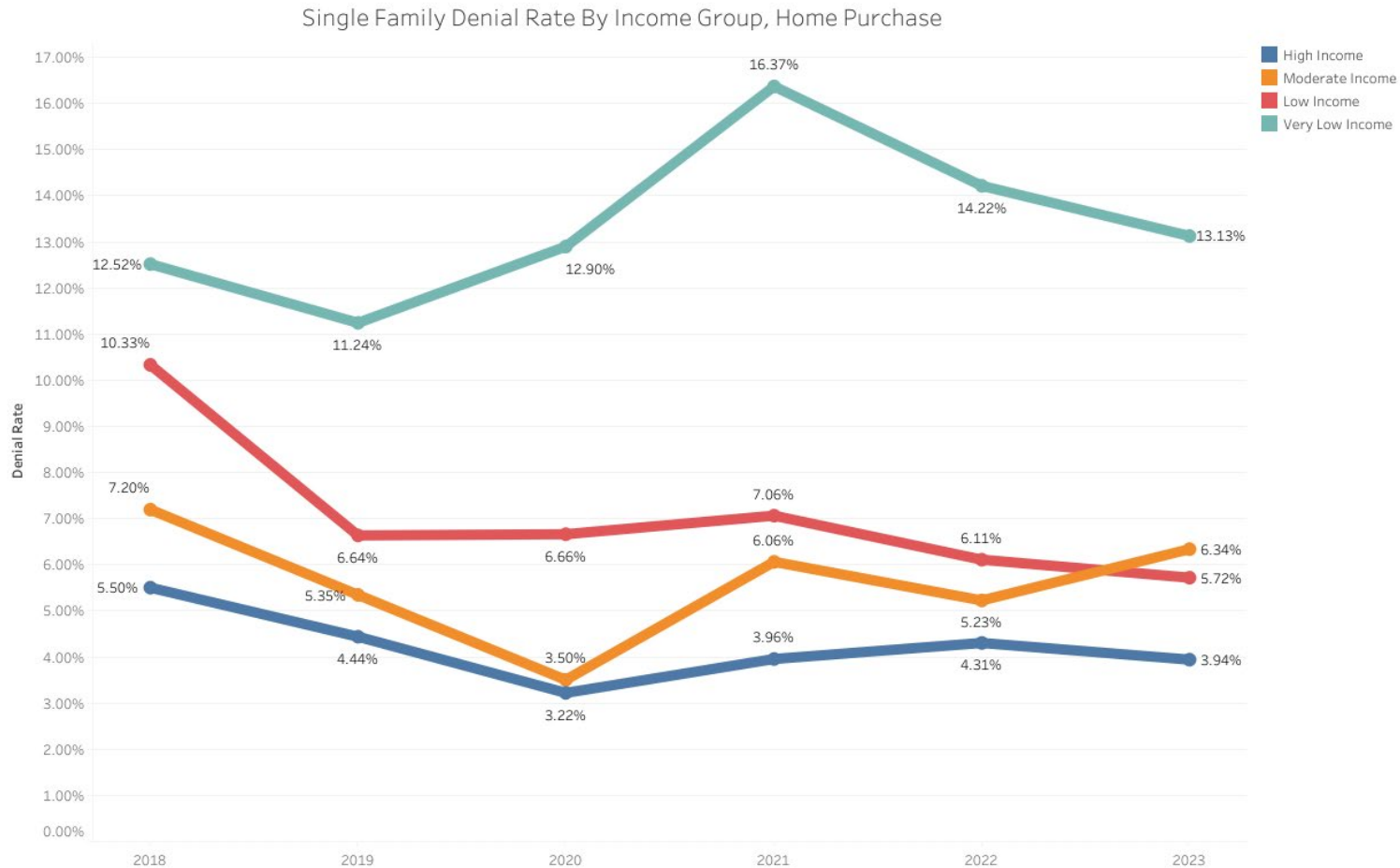
Figure 72: Single Family Denial Rate by Income Group, Overall, 2018- 2023



Source: 2018-2023 HMDA

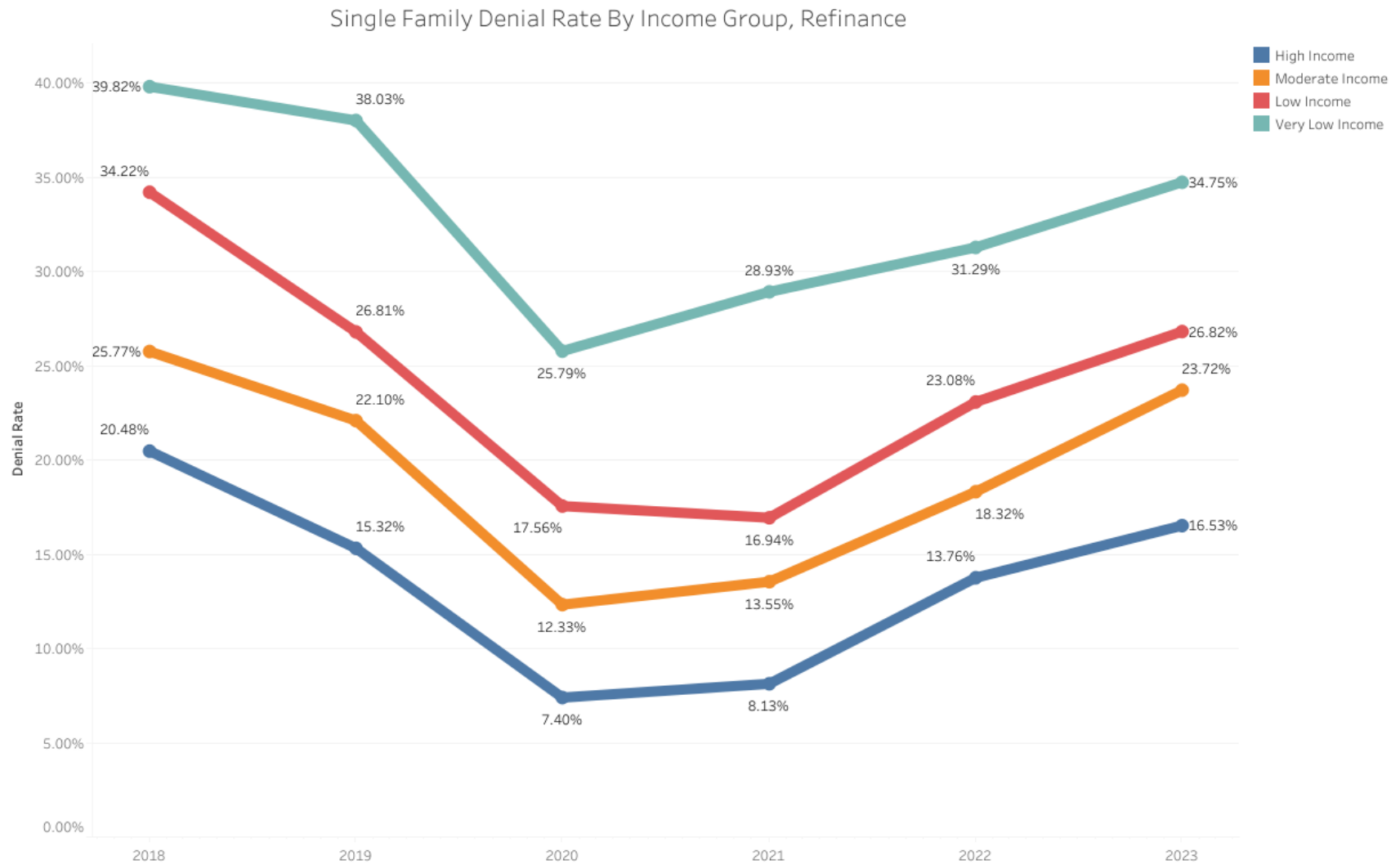
Unlike overall denial rates by income group, home purchase applications denial rates by income group show little variation from year to year within the income group except for Very Low Income. The denial rates due to refinancing is the major contribution to the income group variations – the very low-income groups in 2023 are denied at 34.75% compared to 16.53% for High income.

Figure 73: Single Family Denial Rate by Income Group, Home Purchase, 2018- 2023



Source:2018- 2023 HMDA

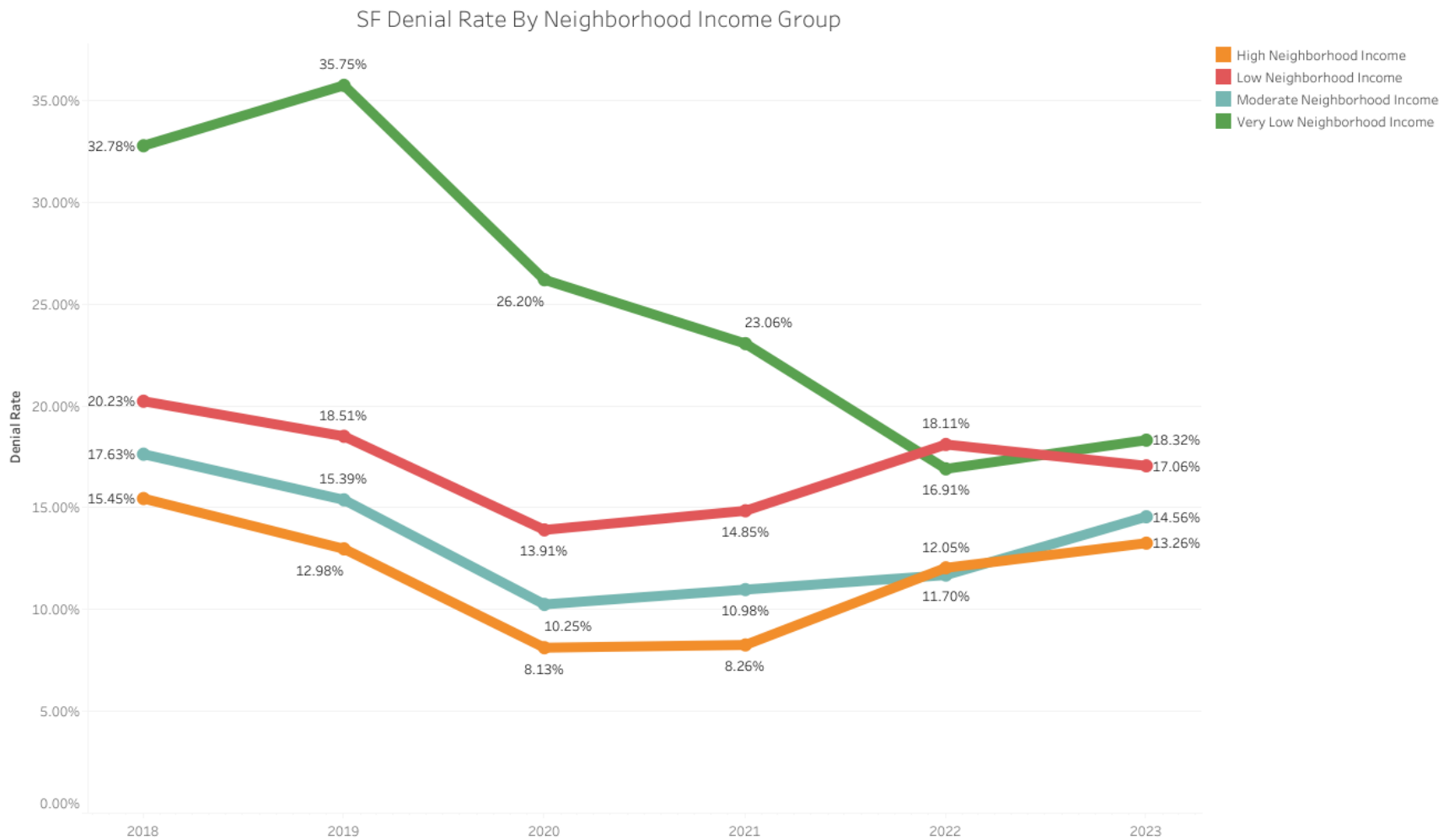
Figure 74: Single Family Denial Rate by Income Group, Refinance, 2018- 2023



Source: 2018-2023 HMDA

Denial rates by neighborhood income group (defined as median income of property's Census tract) similarly shows higher income neighborhoods are less likely to be denied compared to lower income neighborhoods.

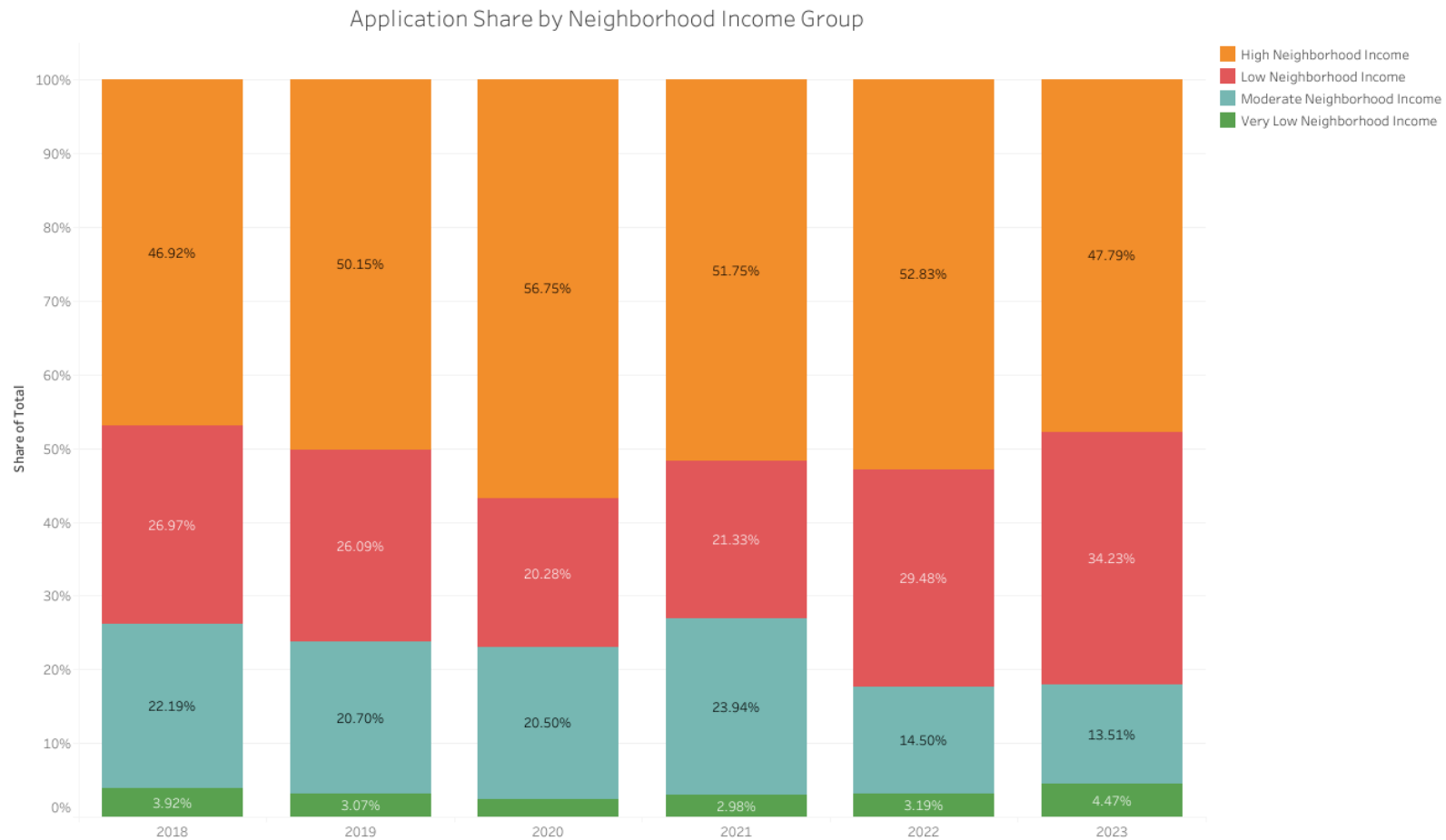
Figure 75: Single Family Denial Rate by Neighborhood Income Group, 2018- 2023



Source: 2018-2023 HMDA

As a percentage of total applications within Tulsa, the distribution among neighborhoods by income group shows that for every year examined, High-Income neighborhoods represented consistently by 50% of the applications. The Low-Income neighborhoods share has been on the rise.

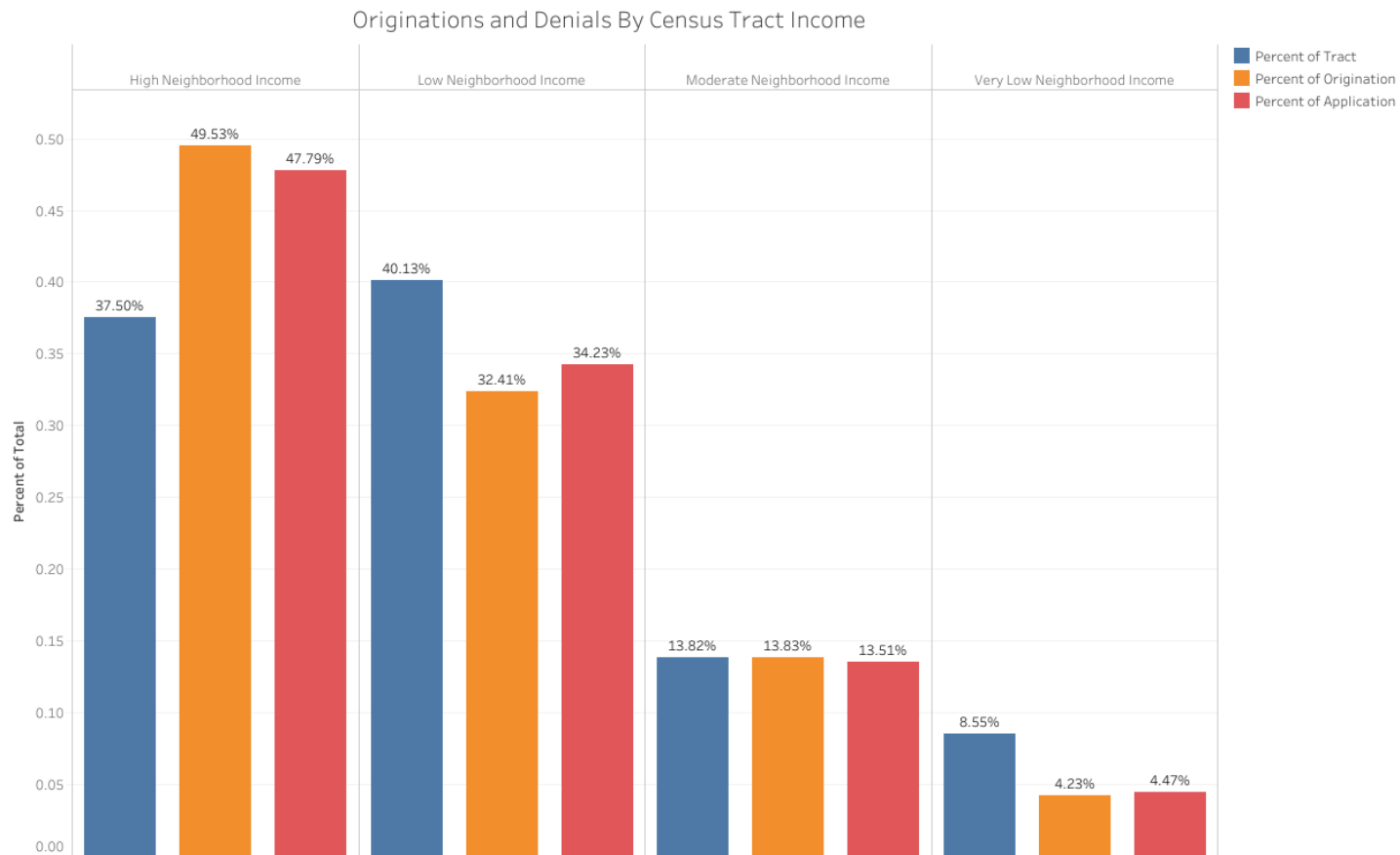
Figure 76: Application Share by Neighborhood Income Group, 2018- 2023



Source: 2018-2023 HMDA

Within Tulsa, the Very Low-Income neighborhoods represent 8.55% of the city’s total neighborhoods, although they are represented by approximately 4.23% of total originations and 4.47% of applications as of 2023 (shown below). The High-Income neighborhoods represent 37.5% of the city’s total neighborhoods but they represent 49.53% of origination. This suggests that Very Low-Income neighborhoods within the city are less likely to participate in the single-family lending market relative to other neighborhoods.

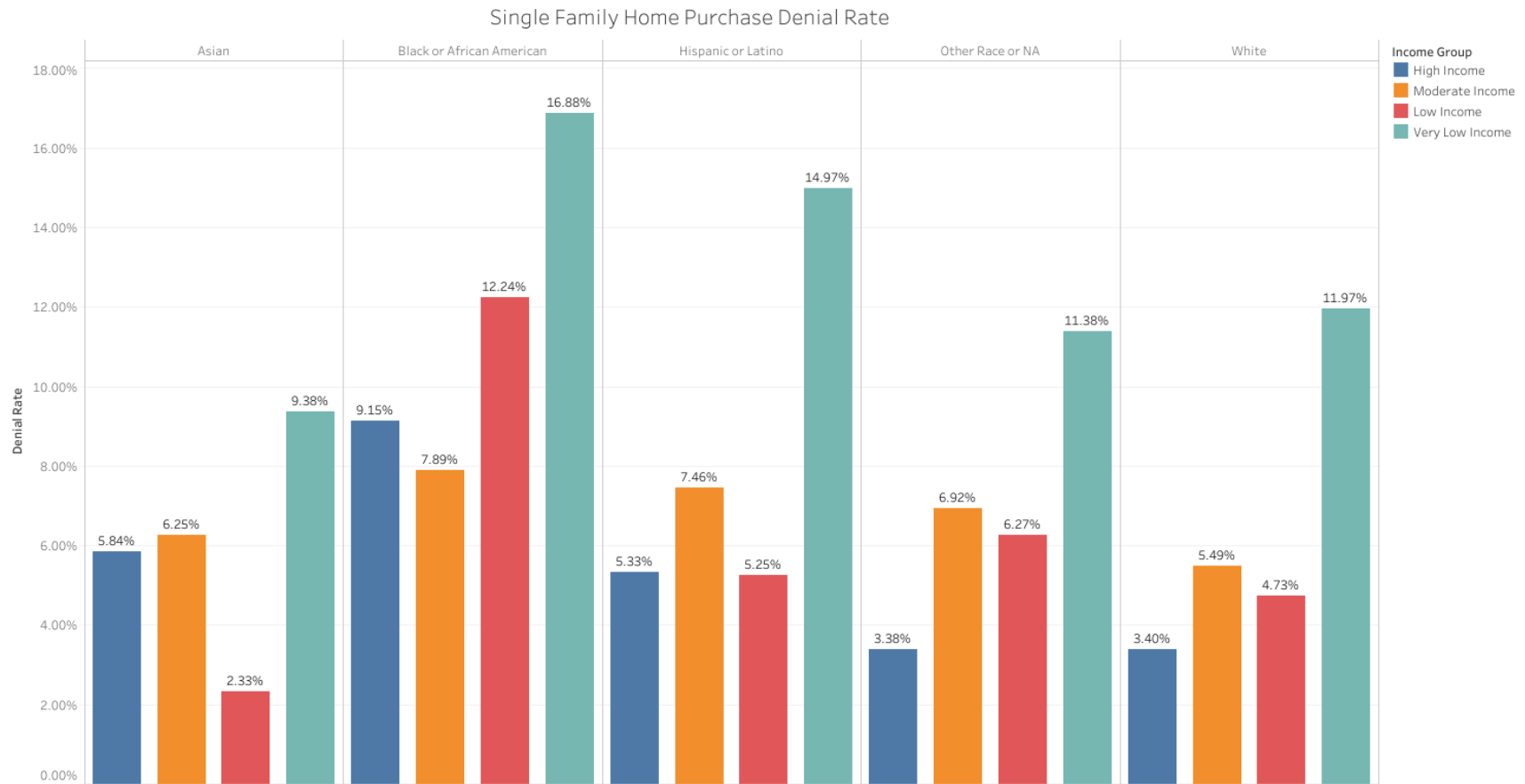
Figure 77: Originations and Denials by Census Tract Income, 2023



Source: 2023 HMDA

Additionally, a closer look at home purchase denial rates by race/ethnicity and income group within Tulsa City (shown in Figure 78 below) demonstrates that Very Low-Income Black and Hispanic were more likely to be denied for a single-family home purchase. The White beside the Very-Low income group has the lowest denial rates across all income categories.

Figure 78: Single Family Home Purchase Denial Rate, 2023



Source: 2023 HMDA

Application Denial Reasons by Income Group

The charts in Figures 79-82 below compare denial reasons among White, Black, Hispanic and Asian applicants in Tulsa City for 2023 by income group.

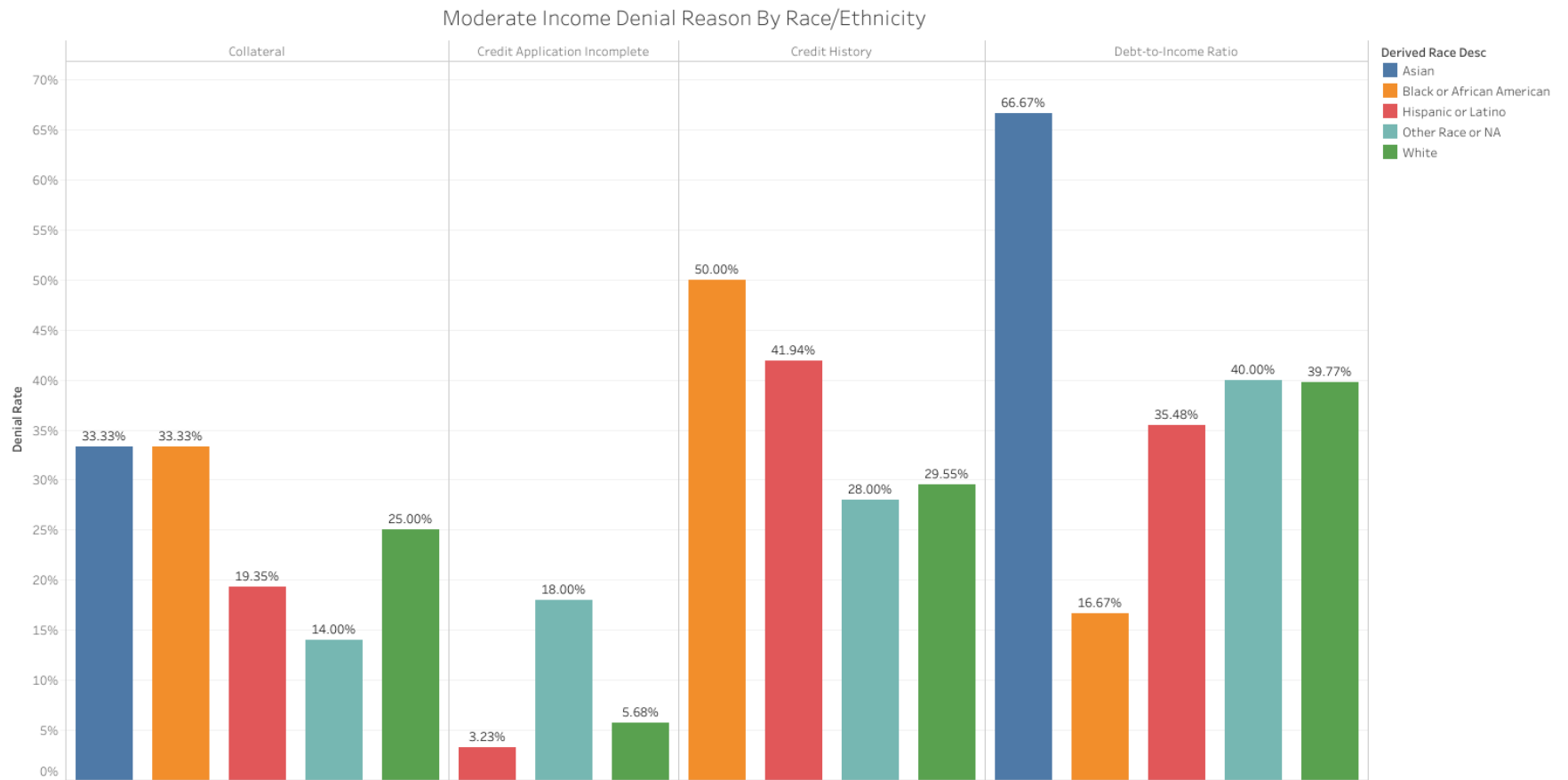
As of 2023, the leading denial reason for all applicants across all income groups was Debt-to-Income ratio (33.18%), Credit History (27.09%) and Collateral (14.56%).

Figure 79: High Income Denial Reason by Race/ Ethnicity, 2023



Source: 2023 HMDA

Figure 80: Moderate Income Denial Reason by Race/ Ethnicity, 2023



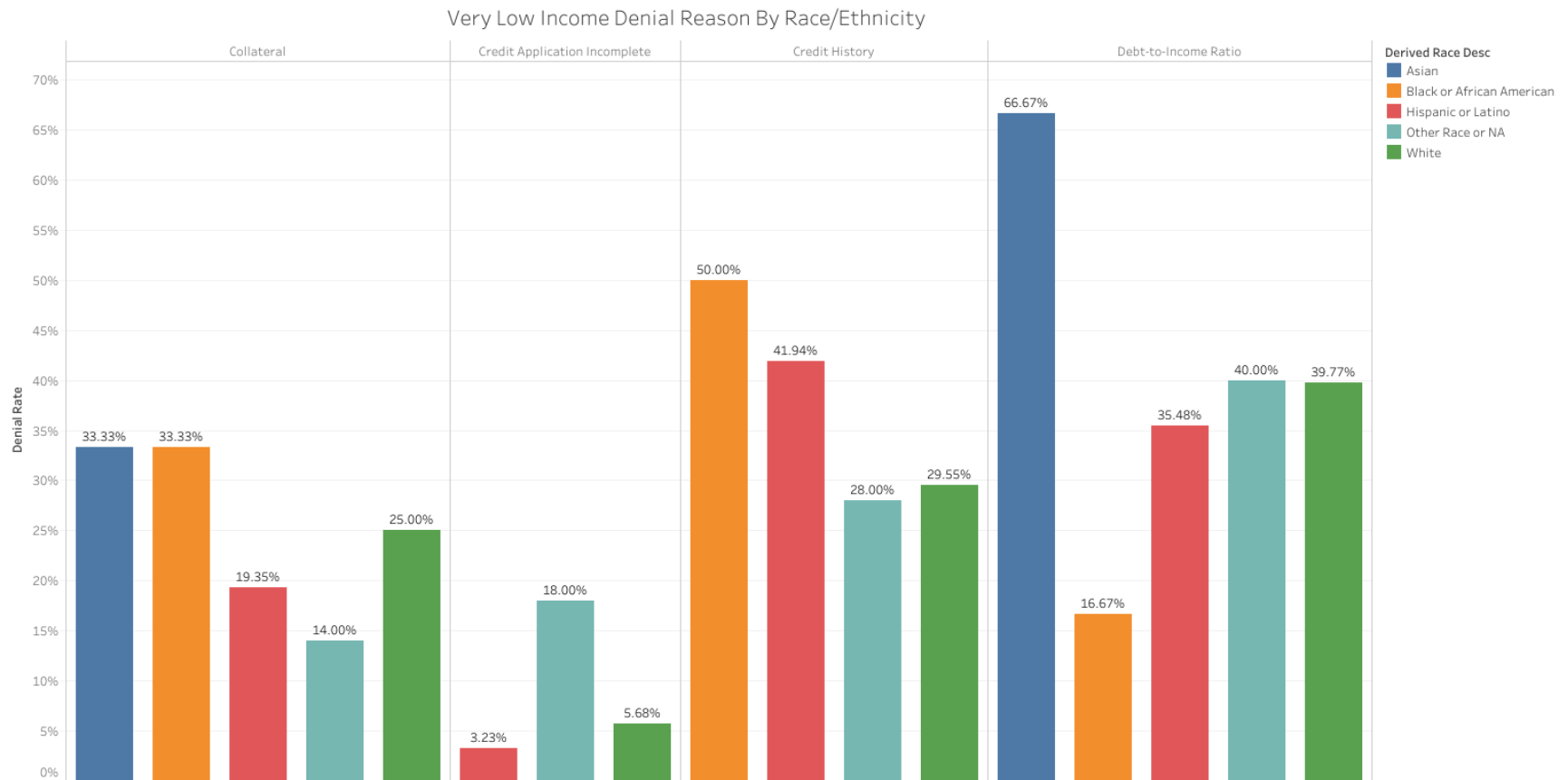
Source: 2023 HMDA

Figure 81: Low Income Denial Reason by Race/ Ethnicity, 2023



Source: 2023 HMDA

Figure 82: Very Low-Income Denial Reason by Race/ Ethnicity, 2023

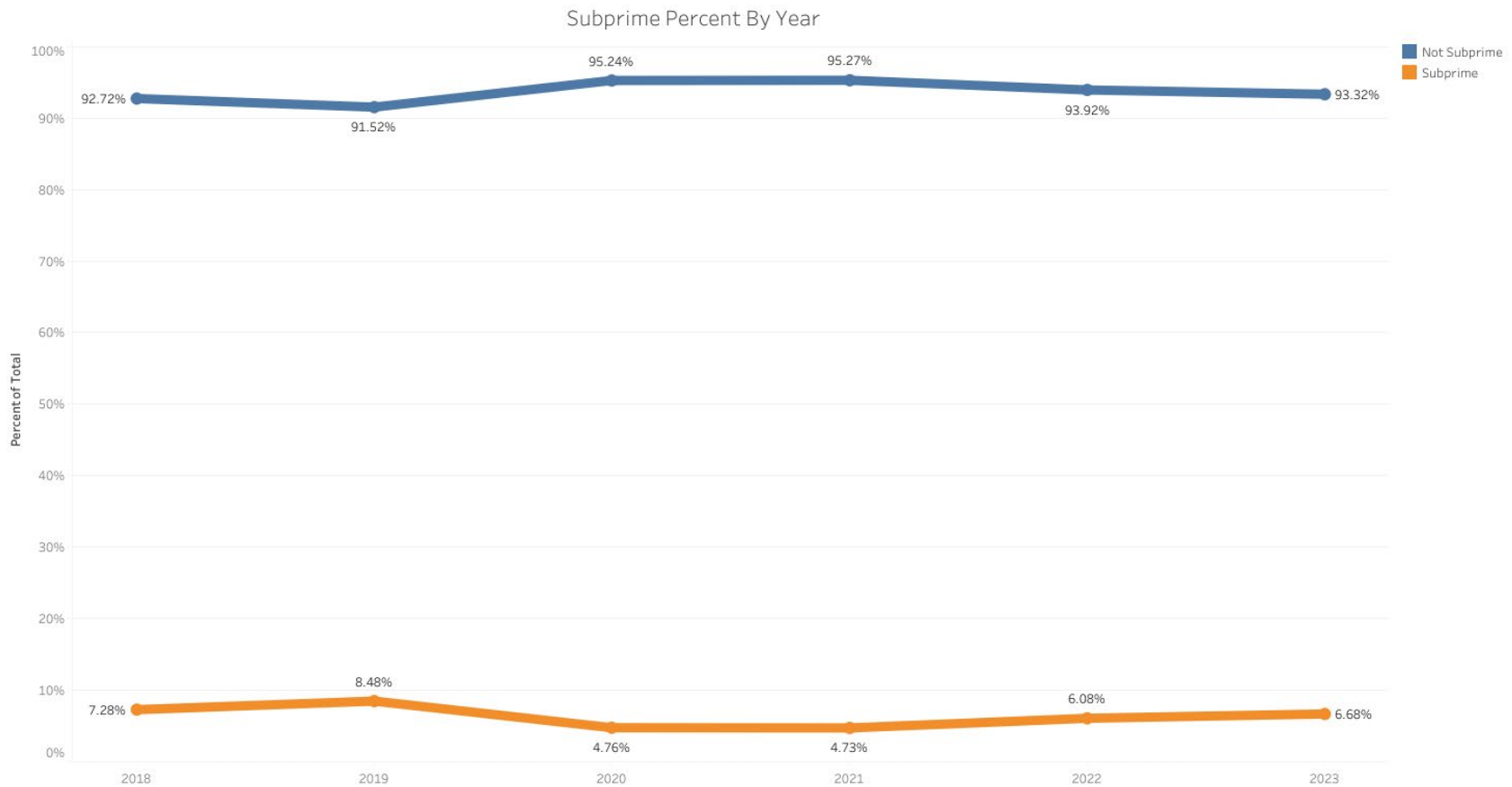


Source: 2023 HMDA

The Subprime Market

Illustrated below in Figure 83, the subprime mortgage market (Subprime loans are defined as those with an annual percentage rate that exceeds the average prime offer rate by at least 1.5%) in Tulsa City has fluctuated from year to year. The total number of subprime mortgages increased in 2023.

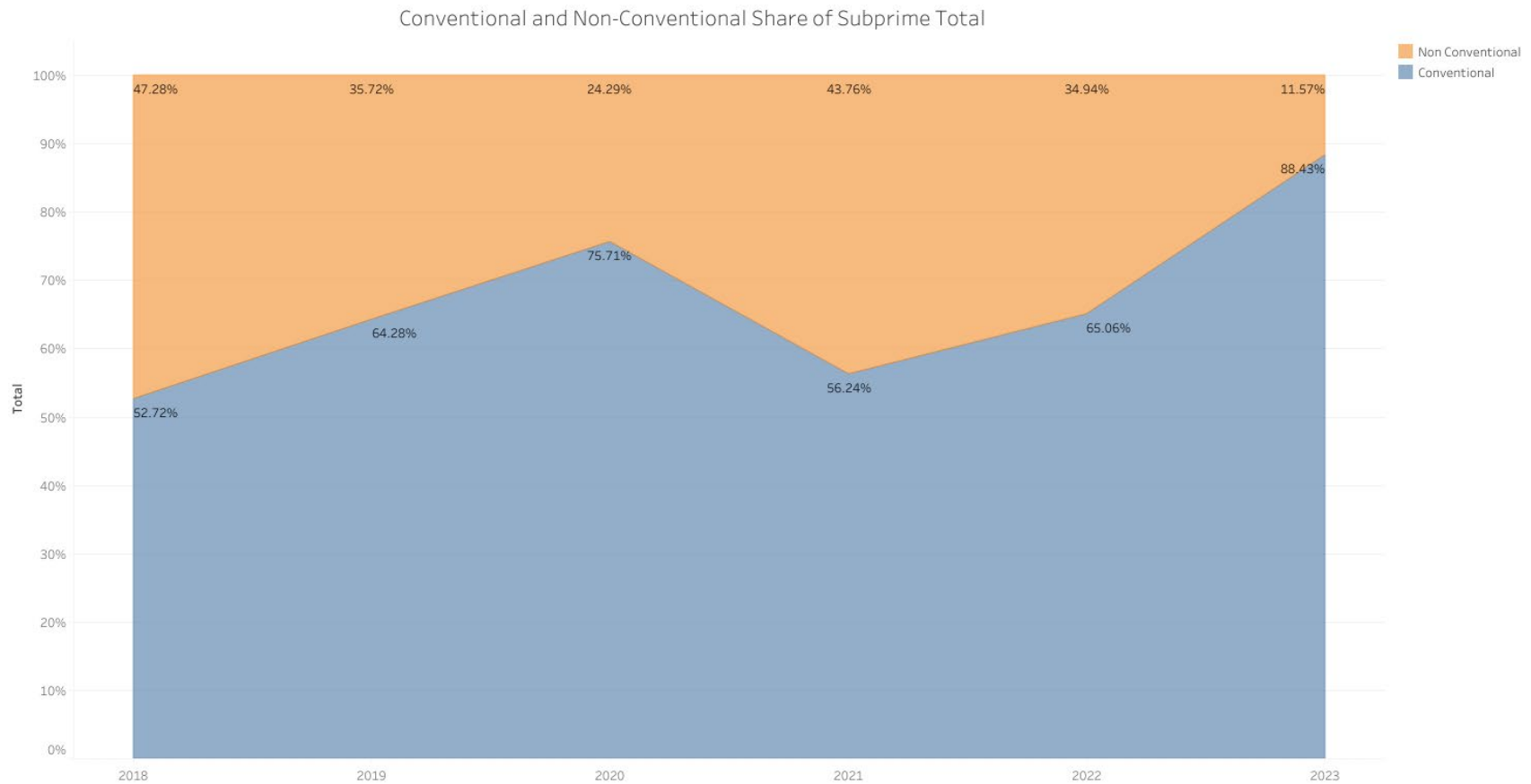
Figure 83: Subprime Percent by Year, 2018- 2023



Source: 2018-2023 HMDA

The subprime loans from 2018 to 2023 have steadily increased in Conventional loan applications.

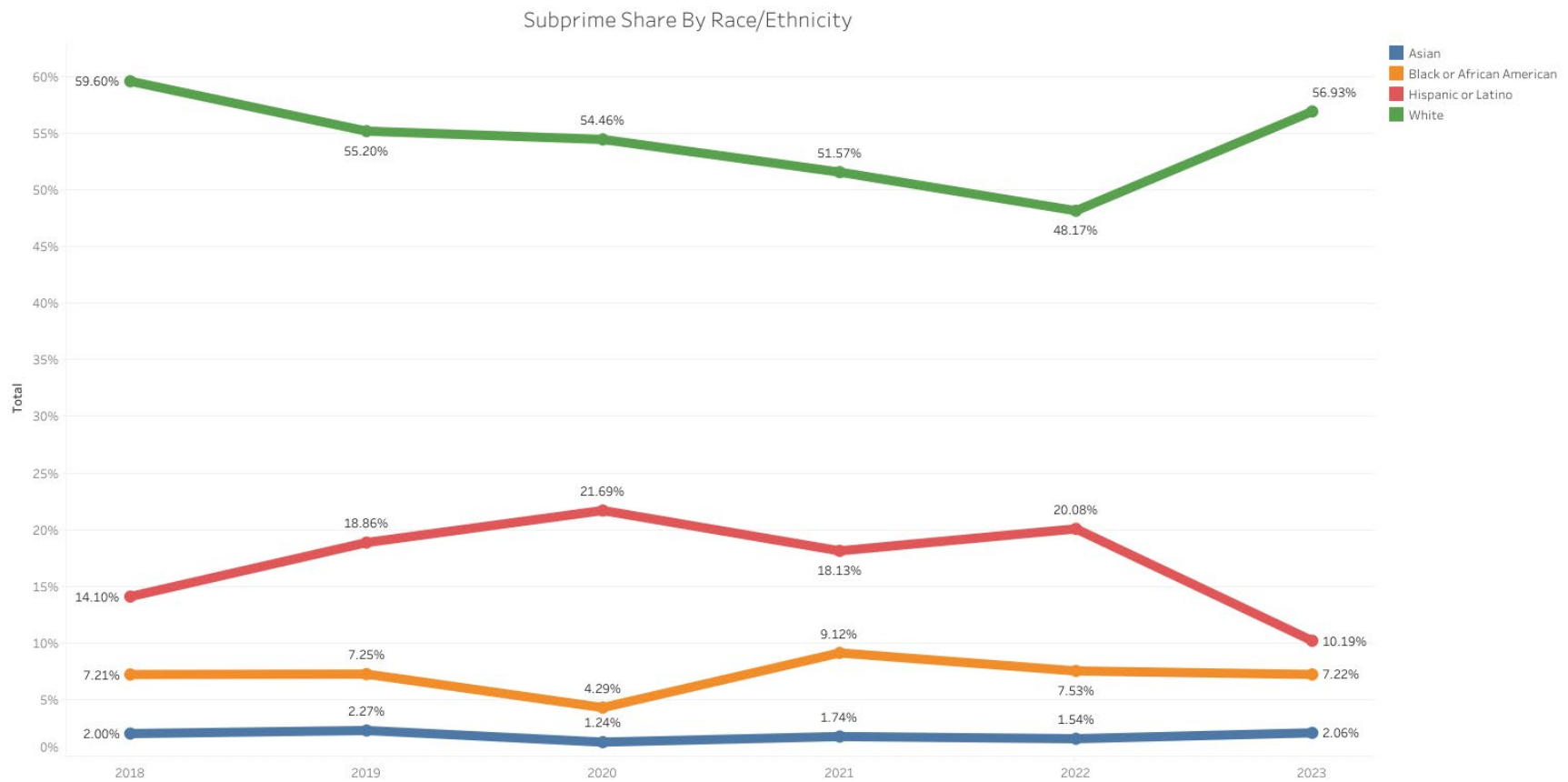
Figure 84: Conventional and Non-Conventional Share of Subprime Total, 2018- 2023



Source: 2018-2023 HMDA

Subprime originations by race/ethnicity show that White loan recipients had the highest share compared to other groups for nearly everyone examined.

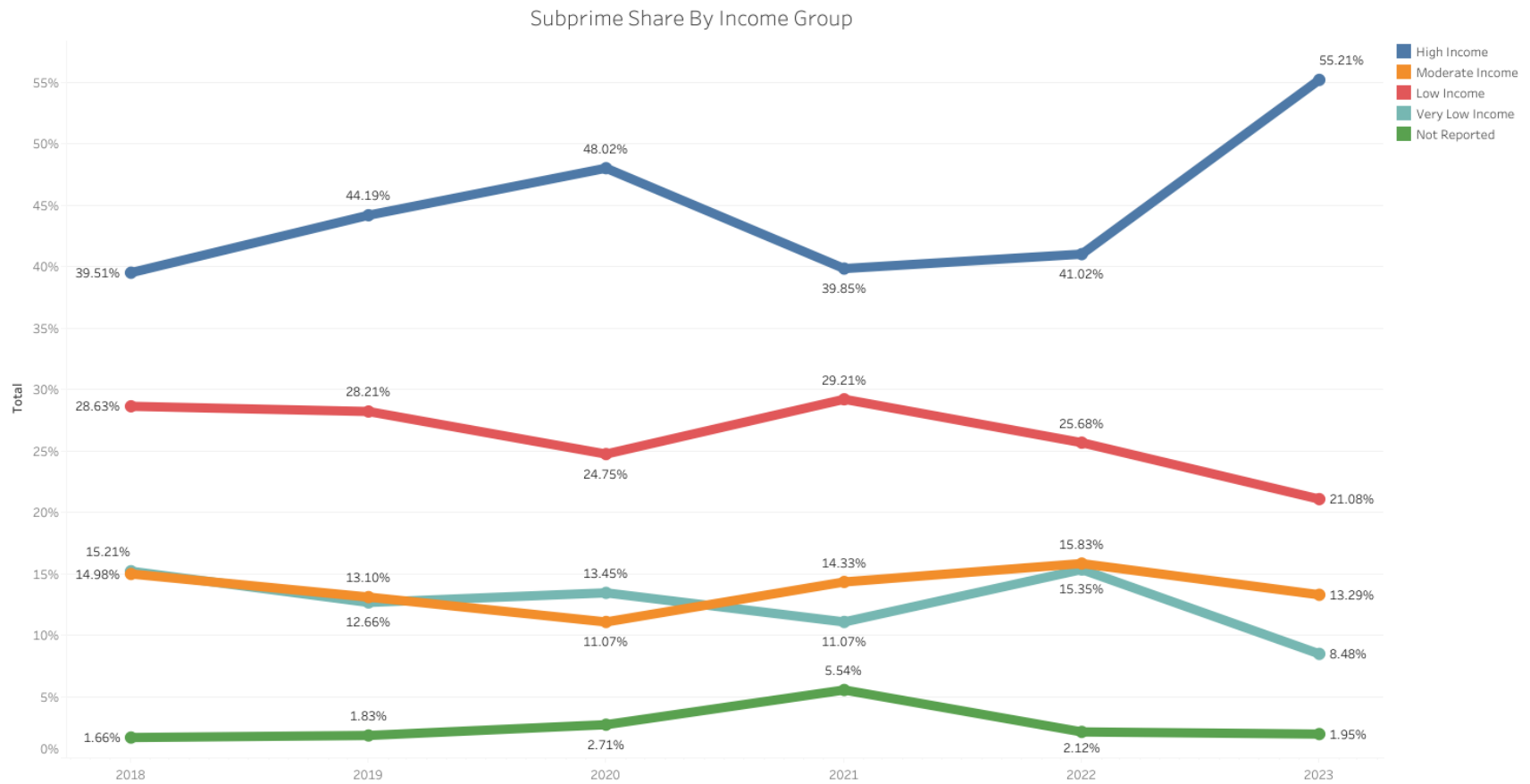
Figure 85: Subprime Share by Race/Ethnicity, 2018- 2023



Source:2018- 2023 HMDA

Subprime shares by loan recipient income group show that since 2018, income groups have diverged, with High-Income remaining much higher than other income groups.

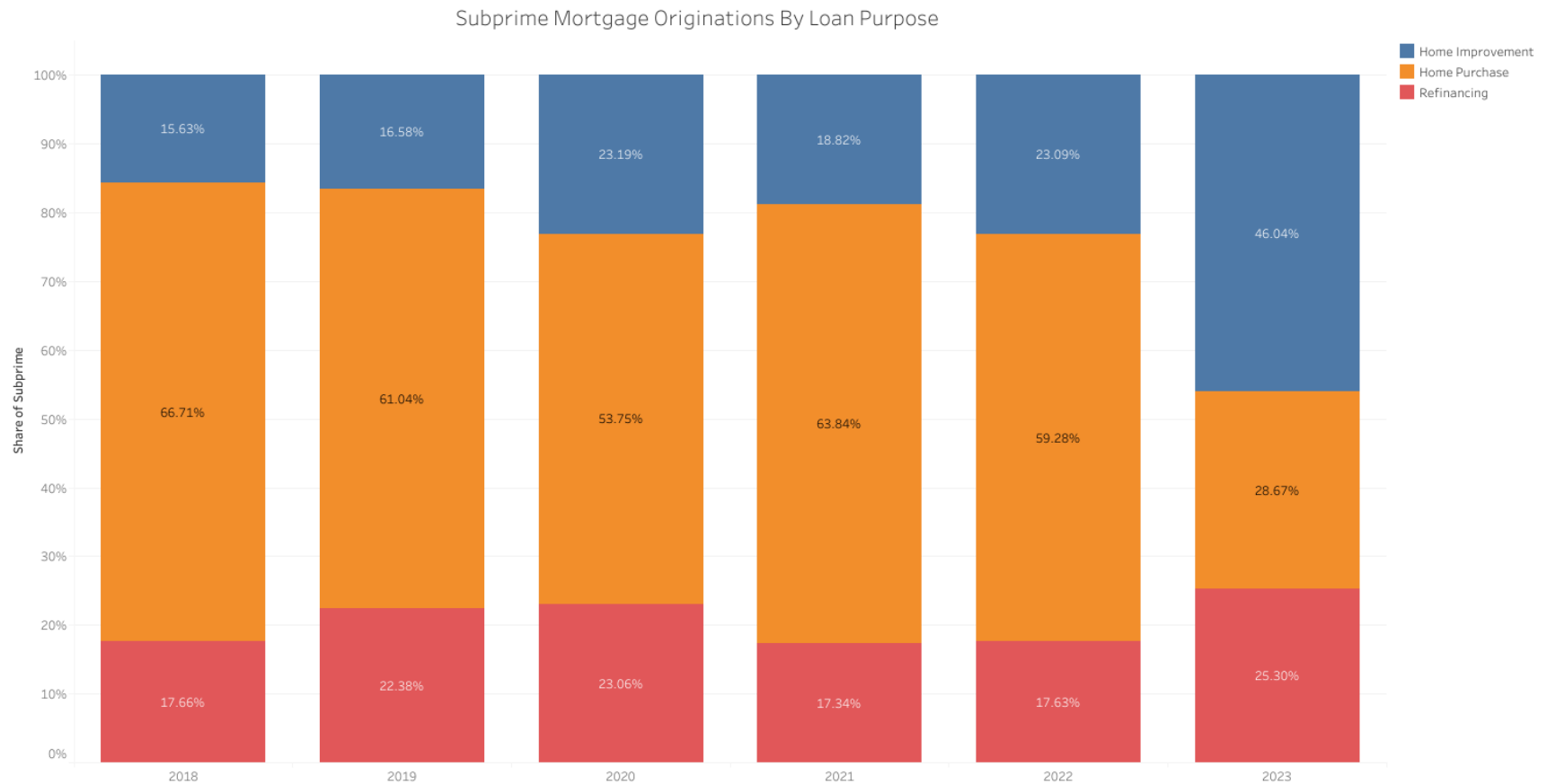
Figure 86: Subprime Share by Income Group, 2018- 2023



Source: 2018-2023 HMDA

Subprime loans have been characterized by growth in home improvements in recent years. As of 2023, the subprime are most represented in Home -Improvement followed by Home Purchase and Refinancing.

Figure 87: Subprime Mortgage Originations by Loan Purpose, 2018- 2023



Source: 2018-2023 HMDA

Lending Practices Conclusion

Mortgage lending activity in Tulsa City is consistent with many of the broader trends that have occurred in the wake of high inflation and high interest rates.

Further, Tulsa City exhibits slowing mortgage market fundamentals from the highs of 2020 and 2021 when the interest rates were lower, and housing supply was low. The number of loan applications declined to approximately 33% from its peak in 2021. The decline is 39.79% from 2022 to 2023. The loan originations have also declined to approximately 38% from its peak in 2021. The 2022 to 2023 decline is 21.61%. The trend is similar to the national decline of 34.5%. Home purchase origination and home improvement have all decreased from 2021, suggesting signs of declining housing demand and a slow housing market recovery within the city. Additionally, the share of refinance applications has reduced drastically due to higher interest rates. Debt-to-Income ratio, Credit History and lack of Collateral are the most common reasons for denial across all income groups reflecting high inflation and stagnant wages, coupled with high interest rates.

Some trends, however, have continued despite business cycle fluctuations, such as higher denial rates for Black and Hispanic applicants relative to White and Asian applicants, in addition to higher denial rates for lower income applicants and neighborhoods.

SECTION VII. FAIR HOUSING IN THE PUBLIC SECTOR

This section looks at actions taken by the City and nonprofit community organizations to address housing and housing access concerns.

Tulsa Equality Indicators

Tulsa Equality Indicators was initiated in 2017 by the City of Tulsa and the Community Service Council as a tool to measure and track disparities among subgroups of Tulsans over time. Seven years of quantitative data are now available to inform our city and community leaders about inequalities in opportunities and outcomes, and to guide public policy and innovative solutions that will lead to greater equity for all Tulsans.

Six themes serve as the foundation for the Tulsa Equality Indicators tool. Each of the six themes is divided into three topics consisting of three indicators—54 indicators in total.

Tulsa’s overall equality score has increased every year since the inception of the Tulsa Equality Indicators series. At 43.09, the City score for 2024 is 4.4 points higher than in 2018, and 1.07 points higher than last year’s score, signifying gradual overall improvement in equality for the collection of indicators measured. Five of the six themes in the report show score improvement since 2018 – Education, Economic Opportunity, Housing, Services, and Public Health – while only the Justice theme has declined.

Annual reports on the Tulsa Equality Indicators can be found on the [City’s website](#).

Actions to Address Homelessness

The Continuum of Care (CoC) governance structure is designed to include Federal, State, local and private entities serving the homeless in the planning and coordination of services. The CoC lead agency, Housing Solutions, coordinates and manages over \$4 million per year in funds for programs providing shelter, housing, and services to people experiencing homelessness or at risk of homelessness. CoC-funded programs leverage community-based and entitlement services in the community to provide wrap-around services for individuals. The CoC is integrally involved with local VA efforts to eliminate Veteran Homelessness. The CoC and private philanthropic partnerships have leveraged public dollars to fund 2,300+ emergency shelter, transitional, and permanent housing beds for people experiencing or exiting homelessness.

The Tulsa CoC, known as A Way Home for Tulsa, includes over 50 partner organizations from the health, mental health, and employment services sectors that participate in community-wide planning and collaboration with mainstream benefit providers, such as Oklahoma Department of Human Services. The CoC’s strategic plan for making homelessness rare, brief, and non-recurring

includes coordinating services across systems of care to reduce barriers to housing. The following organizations are CoC partners:

Health – Aetna Better Health of Oklahoma partners with A Way Home for Tulsa to increase Medicaid access for those experiencing homelessness. This follows The State of Oklahoma’s decision to expand Medicaid under the Affordable Care Act (ACA) on June 30, 2020. SoonerCare benefits for eligible adults went into effect as of June 1, 2021. Morton Comprehensive Health Services (MCHS), a Federally Qualified Health Care (FQHC) and Homeless Services Clinic, provides Medicaid enrollment assistance, free preventative and chronic primary medical/ dental care, health care management for adults and children, discounted prescription drugs, and free transportation to and from all health care appointments. The Oklahoma Department of Health maintains the Oklahoma Safety Net Providers Directory to assist individuals and families who cannot afford health care services find free and low-cost resources. The VA provides a large medical facility that serves the Tulsa area's homeless veterans with a full range of medical services.

Mental Health – The Tulsa Center for Behavioral Health (TCBH) is a 56-bed acute care psychiatric hospital owned and operated by the Oklahoma Department of Mental Health and Substance Abuse Services (ODMHSAS). ODMHSAS partners with A Way Home for Tulsa to triage, evaluate, assess, and treat individuals who present in a mental health crisis. TCBH is anticipated to be replaced by the Oklahoma Psychiatric Care Center in 2025- a 106-bed hospital that will feature a 24-hour crisis response Urgent Recovery Center. For veterans and individuals with qualifying disabilities, supportive housing options are available through multiple providers.

Mental Health Association OK (MHAOK), Family and Children’s Services (F&CS), and Counseling and Recovery Services of Oklahoma (CRS) provide a wide range of mental health services, some coupled with housing within the Continuum. MHAOK operates the Street Outreach and Rapid Response Team, which sends team members out into the streets of Tulsa to build relationships with individuals experiencing chronic homelessness and to offer mental health services and housing support. F&CS offers services such as substance abuse and addiction treatment, Community Outreach Psychiatric Emergency Services (COPES), and the Crisis Care Center for emergency psychiatric needs of adults. The Berry Creek and Saville transitional living apartments, operated by CRS, offer fixed rent, including utilities, to homeless individuals receiving treatment for mental health issues for up to two years. Further, collaboration between MHAOK and Youth Services of Tulsa (YST) supports housing for 18- to 24-year-olds with CoC funded permanent housing units.

Employment – All CoC participants are assessed for income supports including mainstream benefits by staff designated to assist with applying for benefits. Mainstream community-wide

services available to the homeless include job search assistance, job preparedness and training, and employment initiatives. One such program, administered by Catholic Charities of Eastern Oklahoma, is a 12-week paid culinary training program that offers case management support and job placement assistance upon graduation. Students ages 18- 24 enrolled in one of the 9 colleges or universities that make up the Tulsa Higher Education Consortium, and who are or are at-risk of experiencing homelessness, can receive rapid rehousing assistance under the Tulsa Youth Homelessness Demonstration Program (YHDP). Additional assistance is available for homeless veterans through the Veterans' Workforce Investment Program (VWIP) and Volunteers of America's Oklahoma Veterans Employment Services program.

Further, as part of the CoC strategic plan implementation, Housing Solutions will provide training, technical assistance, and resources to providers and community partners to support service delivery using best-practices, such as trauma-informed care. The City of Tulsa is supporting affordable housing access in several ways which are outlined in the 2024 Tulsa Housing Strategy. As part of this strategy, the City will: Establish and fund housing project coordinator positions to guide housing developers through the entitlement, permitting, and development approval processes; Form a Housing Coalition to communicate about, advocate for, and support housing at the local and state levels; Establish a housing development grant program to fund the development gap for deeply affordable properties, including permanent supportive housing; and Align and expand landlord recruitment and incentives, landlord-tenant mediation, and related initiatives in Tulsa.

SECTION VIII. COMMUNITY OUTREACH

Fair Housing Survey

The City of Tulsa conducted two sets of online surveys that were available to residents and other community stakeholders in both English and in Spanish. In addition to the surveys being available online (using computers, smart phones, and other handheld devices), the surveys were also made available to residents in a paper-based version. Access to the survey was provided through the City of Tulsa website, through stakeholder email lists, posted in public convening locations, and published in print with QR Codes made available for residents to scan and link to the survey. Background on the Analysis of Impediments process and definitions of fair housing were provided in the survey introduction. The importance of community participation was also highlighted in the survey introduction.

The first survey was targeted to residents of Tulsa and was meant to get a sense of community positions on fair housing and more general housing and economic development issues. It was comprised of 33 questions covering a range of data points including demographic information, residential information, knowledge of fair housing rights, experiences with fair housing discrimination, opinions on access to information on fair housing, and questions related to housing and community development more generally. The second survey was comprised of 35 similar questions but was targeted to community stakeholders and representatives of various businesses and nonprofit organizations operating within Tulsa.

For the resident survey, there were 143 responses. The stakeholder survey received 38 responses. There were no responses for either of the surveys in Spanish. The non-existent Spanish participation rate points to an area of improvement in community engagement for future processes. The City has provided all materials in multiple languages and connected to community organizations that cater to the Latino community for assistance with outreach, but the effort did not result in participation. The survey was open from August 6th until August 30, 2024 with multiple opportunities and reminders for stakeholders and residents to participate.

Resident Respondent Profile

The respondents to the resident survey were mostly white (59%) women (74%). The age range was fairly evenly distributed with 25% of respondents being between 25-34, 24% being 35-44, and 17% being between 45 and 64. They were mostly long-time residents of the City of Tulsa, with 75% of them having lived in the City for more than 10 years. The respondents were distributed throughout the City. Only 2% of people responding to the survey identified as Hispanic/Latino. African Americans made up 14% of respondents, 1% were Asian respondents,

14% responded they were more than one race, and 15% were Native American. English was the most common language spoken at home at 95%, 1% said Spanish, and 4% of respondents preferred not to say. 21% of those that responded said they have a disability or disabling condition.

In terms of earnings data, 39% of respondents said they earned \$75,000 per year or above, 25% earned between \$45,000-\$74,999, and 10% earned below \$20,000. The majority (43%) of respondents live with one other person. Most of the respondents (69%) did not have any children under the age of 18 in their household. In addition, of the total respondents, 47% said they spend over 30% of their income on housing (including insurance and utilities), and of those, 14% said they spent more than 50%. Most of the respondents (62%) own their home, and most of those (43%) with a mortgage. Twenty-nine percent (29%) are renters. Twenty-six (26%) identify as belonging to the LGBTQ community and 8% are veterans.

When asked what the most common issues they had faced in the last two years was related to their housing and neighborhoods, the most common response at 14% was houses were in poor condition in their neighborhoods. Twelve percent (12%) said that their neighborhoods had crime or abandoned buildings. Twelve percent 12% were dissatisfied with the local services including trash pickup and street maintenance. Nine percent (9%) said that they experienced difficulty paying their utilities. Nine percent (9%) also experienced an inability to make needed repairs or improvements to their home.

The main barriers to good housing options in Tulsa that were cited included cost of housing, a concentration of affordable housing only in certain areas of the City, the condition of housing units, and the distance to employment, schools, shopping, or services.

Stakeholder Respondent Profile

The majority of the respondents to the community stakeholder survey were non-profits at 89%. The organizations are well-established in Tulsa, with 86% of them being over 10 years in service. The services they provide were fairly evenly distributed among people experiencing homelessness or at risk of homelessness (10%), food insecurity assistance (8%), and services for children and youth, seniors, and people with disabilities representing 7% each. Their main constituents are disabled (53%), low-income persons earning less than \$20,000 per year (33%). Fifty-three percent (53%) of their clients are between 35-64. Only 5% are elderly and 8% are under 18. The race/ethnicity of the majority of their clients was mostly Black/ African American (26%), followed by White/ Caucasian (22%), Hispanic/ Latino (18%), Native American (15%), and Asian (10%).

The organizations rated the housing, safety, and environment of their service areas as an average of 4.6 on a scale of 1-10. The reasons given were largely related to concentrations of homelessness, substandard housing, and high crime rates. The vast majority responded that their clients had difficulty paying their rent/mortgage (12%) and their utilities (12%). Eleven percent (11%) had clients that experienced homelessness in the last two years.

Most of the organizations agreed that the cost of housing, the concentration of affordable housing in certain neighborhoods, the condition of housing units, and transportation or access to public transportation were the main barriers to finding good housing options in Tulsa, with 57% of respondents selecting those as top reasons.

Resident Survey Fair Housing Questions

There were 11 questions on the resident survey that specifically focused on fair housing. When asked about protected classes, most respondents knew about race, religion, sex, and national origin, but were less sure about the other classes. When the questions delved deeper into whether people were aware of their rights, the responses were split between those that did know their rights (47%), and those that did not (27%) and those that were unsure (25%). Knowledge of rights under Fair Housing law was partially reflected in the responses about whether they were aware of any housing discrimination incidents. Thirty four percent (34%) of respondents were not sure if they knew of any incidents. That said, 47% said that they were not aware of any and 19% said they did know of incidents.

Out of the 19% that said they were aware of an incident, when asked to choose all reasons for discrimination that applied, the top reasons were: race/ethnicity (13%), income level (12%); criminal background (12%); and source of income (10%). The rest of the responses to this question were distributed among the 11 other possible choices. According to the survey, these incidents occurred in both single-family neighborhoods (23%) and in apartment complexes (58%). Over half of respondents did not report the incident, and the most common reasons given were that they did not think it would make a difference or that anyone would do anything about it.

In terms of education on fair housing issues, most respondents were not aware of any fair housing or anti-discrimination education opportunities in their community (63%), and the majority of them (84%), have never participated in any kind of educational opportunity.

Stakeholder Survey Fair Housing Questions

There were 12 questions on the stakeholder survey that specifically focused on fair housing; beginning with whether or not respondents were familiar with fair housing or anti-discrimination laws. Only 11% of those that answered were not familiar with the laws. Thirty-four percent (34%) were very familiar, twenty (20%) were familiar, and thirty-four percent (34%) were somewhat familiar. When asked about protected classes, most respondents knew about race, religion, sex, national origin, and age but were less sure about the other classes. When respondents were asked if they were aware of any housing discrimination incidents in Tulsa in the last five year, thirty four percent (38%) of respondents were not sure if they knew of any incidents. Thirty-two percent (32%) said that they were not aware of any and thirty (30%) said they did know of incidents.

Out of the 30% that said they were aware of an incident, when asked to choose all reasons for discrimination that applied, the top reasons were: source of income (16%), income level (13%); and race or ethnicity (13%). The rest of the responses to this question were distributed among the 12 other possible choices. According to the survey, these incidents mostly occurred in apartment complexes (80%). Over half of respondents (60%) did not know if the incident was reported, but the remaining were reported to a fair housing group (10%) or government agency (30%).

In terms of education on fair housing issues, most respondents were not aware of or were unsure if they were aware of any fair housing or anti-discrimination education opportunities in their community (58%), and the majority of them (54%), have never participated in any kind of educational opportunity.

Open Responses

Throughout the survey, there were opportunities to give open responses. Some telling responses are as follows:

From the Organizational Survey:

“Many of our clients have been refused housing based on their criminal backgrounds. In most situations, the landlord does not take into account the nature of the crime OR how long ago the crime occurred. Once the landlord runs the background check and sees a past crime, the prospective candidate is denied housing.”

“Most entities operate under the fair housing act however, there are just too few housing opportunities in the North Tulsa area.”

“landlord and 3 party and outside coming in raising price on apartments and housing like Texas California New York investment and investors.”

From the Citizen Survey:

“Legal protections fall short when those that need them cannot afford legal representation.”

“There is discrimination against people low to moderate income getting approved for housing loans through lenders and finding rental properties through section 8. There is not enough housing period.”

“The City of Tulsa needs a source of income discrimination law/ordnance ASAP. Too many apartment and home listing include the words "No Section 8" or do not accept Section 8 voucher applications - this is income discrimination - it runs rampant in this city and it is putting people on the streets.”

“I would like to know more about it. I know that a lot of people are mistreated in rental units, they are at the mercy of the landlords from fear of being kicked out or homeless.”

Focus Group Discussions

Eleven community and stakeholder focus groups were held throughout the City of Tulsa. They were held between August 19 and August 22, 2024, and were held at City Hall as well as various community locations including the Martin Regional Library, Rudisill Regional Library, Zarrow Regional Library, and the South Tulsa Community House. The participants in these meetings included, but were not limited to community residents, and members of organizations covering a range of services including economic development and job training, social services, housing, elderly and vulnerable populations, the Continuum of Care, and fair housing. The 5 people that attended the Fair Housing focus group covered a broad range of issues including housing, community development, and fair housing.

The focus group discussions were guided and facilitated, but it was made clear that participants should feel free to discuss the topics that were top of mind. Participation was encouraged, and it was pointed out that community input is a critical component of the Analysis of Impediments (AI) processes. To encourage thinking about suggestions for solutions, time was set aside at the end of the one hour- to one hour and 15-minute-long session to talk about priorities and thoughts around action items. Participants were encouraged to think of these plans that can help guide solutions to barriers and priority issues identified.

Based on the focus groups and conversations, the following observations were raised:

- Disability is the single biggest protected class Legal Aid is taking action on.

- There is a lack of homes that are accessible to individuals with physical disabilities.
- Wages aren't keeping up with housing costs. The cost of housing was identified as the top barrier to housing choice amongst community meeting attendees and has contributed to an increase of homelessness in Tulsa.
- Oklahoma has a source of income provision that requires another protected class to be implicated (i.e.- it is not a protected class on its own); It would be monumental if source of income became a protected class in its own right, as many households with vouchers can't use them due to landlord discrimination.
- Impact Tulsa has completed study and found that chronic school absenteeism overlays different neighborhoods. Communities of color are most affected by this. Some of those neighborhoods have high eviction rates and others do not, but there are likely informal evictions happening in those that do not. These neighborhoods should be targeted to provide more education of tenant rights.
- Veterans utilizing VA loans can't qualify for a home unless it's in mint condition. Need a way to bridge that gap for veterans.
- The condition of housing was also identified as a significant barrier to housing choice. Tenants are often hesitant to bring up maintenance issues because they have nowhere else to go if they are evicted, so these often aren't being addressed.
- There has been an influx of refugees coming into Tulsa, particularly Burmese and Afghan refugees. There is a lack of available interpretation services to help them fill out rental applications and they are having to pay larger deposits and rental insurance as a result of having no prior rental history or employment.
- The City of Tulsa has flexible Landlord Guarantee funds that pay for damages, unpaid rent, etc. It would be helpful to increase that pot of money to incentivize landlords to go through a mediation process versus pursuing an eviction.

Fair Housing Observations

Organizations were encouraged to give written feedback on the issues they thought were most pertinent to fair housing issues in the City. Two organizations, Legal Aid Services of Oklahoma, Inc. (LASO) and Metropolitan Fair Housing Council of Oklahoma, Inc. (MFHC) provided comments on the topic, with MFHC providing data points on fair housing that will be cited in other parts of this report. MFHC is a member of the Tulsa Area Fair Housing Partnership. Housing Solutions, a member of the City of Tulsa's Fair Housing Committee also provided written comments which were incorporated throughout this report.

LASO is one of the founding partners of the Tulsa Area Fair Housing Partnership (TAFHP) and also a committee member for the City of Tulsa's Fair Housing Committee under the Human Rights Commission (FHCHRC). Their comments are informed by the work they do on fair housing education and "having been actively involved in interacting and responding to those who are

most seriously affected by fair housing barriers.” A sample of quotations from their submission follows. Key among them are that:

- Under §5-104 of the Tulsa Code of Ordinances prohibits discrimination on all of the bases recognized under the FHA, and extends additional protections based on ancestry and marital status. During PY 2015, the City of Tulsa amended its City Ordinance to include additional protections against discrimination in housing based on gender identity and sexual orientation. However, some stakeholders believe that the City of Tulsa conferred rights without a mechanism for enforcement. Thus, the new and existing protections are, in their opinion, nothing more than empty rights.
- Barriers that exist due to old civil records including dismissed lawsuits and unenforceable civil judgments. Landlords rely upon a prospective tenant’s rental history when determining to approve the tenant for an available housing opportunity. Old public records and judgments create the same barriers as unexpunged criminal records since landlords review the public records for any litigation that has been initiated against potential tenants. Additional education needs to occur so that Tulsa residents will know how to remove the barriers that old civil records create and also to avoid evictions.
- Redlining and steering practices also continue in Tulsa. The policies and procedures for the placement of affordable housing complexes and group homes can permit steering and redlining.
- LASO has also identified discrimination based upon sex. This practice happens regularly in Tulsa. LASO currently has a case pending against one landlord in the United States District Court for the Northern District (Tulsa) for sexual harassment.
- LASO recommends that the City of Tulsa engage in additional efforts to educate the public about the fair housing protections that the City provides as well as those provided by the State and federally. In conjunction with the need for public education, LASO recognizes the need for education for housing professionals, including landlords, lenders, real estate professionals, advertisers, insurance providers, and even city officials.
- The City and LASO previously discussed LASO investigating fair housing allegations through the testing process. LASO is willing to conduct testing and to also provide other fair housing assistance to the City of Tulsa. Fair housing enforcement naturally quells discriminatory practices.

In addition, MFHC’s data points submitted as written comments include the following:

During the past five years,

- MFHC processed more than one-hundred two (102) complaint intakes/inquiries originating from Tulsa,

- At least eight (8) of those complaint intakes generated complaint filings with HUD’s Office of Fair Housing & Equal Opportunity,
- Two (2) of the HUD complaints have been settled with \$3,256 in Monetary Recovery through the HUD Conciliation process, the remaining cases are pending at HUD,
- Most complaint intakes/inquiries from Tulsa were resolved through fair housing and renter’s rights counseling.
- At least four (4) complaints were mediated by MFHC staff with \$1,219 in Monetary Recovery for Tulsa complaining parties.

List of Key Points

While the resident survey was broader in scope than just fair housing issues, it touched on many elements that contribute to fair housing choice. To help prioritize, the survey asked respondents to rank items from three categories- essential services, housing needs, and physical and economic development needs- as high, medium, or low priority. For each category, the priority items that relate to access to fair housing include:

Essential Services

Stability and wellbeing of residents creates better opportunities for communities overall, and the priority items in for essential services reflects the desire of respondents to address critical needs. The top priority for this category included services for people fleeing domestic violence, which 70% of respondents indicated was a “high” priority. This was followed by services for people experiencing homelessness or at risk of homelessness (66%), services for children and youth (62%), services for mental health (60%), and food insecurity assistance (60%).

Housing Needs

For housing needs, the top priorities included providing housing opportunities for people that are homeless and providing services for people that are homeless with 62% of respondents calling both of these “high” priorities. Other high priority choices included providing housing opportunities for people with special needs, like the frail elderly, or people with disabilities, alcohol or drug addiction, or HIV/AIDS (54%) and providing housing opportunities for veterans (53%).

Physical and Economic Development Needs

While housing is not listed specifically in this category, the priorities reflect the need for community improvements that relate to better housing choice. The top priority in this category

was building or improving streets, sidewalks, and drainage in the area with 62% of respondents indicating this as a high priority. The other priorities included providing incentives for the development of neighborhood stores in under-served areas (53%) and eliminating environmental hazards such as trash, vacant or dilapidated buildings, and overgrown lots (51%).

SECTION IX. SUMMARY OF FINDINGS

This AI includes a review of both public and private sector housing market contexts to identify practices or conditions that may operate to limit fair housing choice in the City. Analysis of demographic, economic, and housing data included in that review establish the context in which housing choices are made. Demographic data indicate the sizes of racial and ethnic populations and other protected classes; economic and employment data show additional factors in influencing housing choice; and counts of housing by type, tenure, quality, and cost indicate the ability of the housing stock to meet the needs of Tulsa residents.

The contextual analysis described above provides a foundation for detailed review of fair housing laws, studies, complaints, and public involvement data. The structure provided by local, state, and federal fair housing laws shapes the complaint and advocacy processes available to residents, as do the services provided by local, state, and federal agencies. Private sector factors in the homeownership and rental markets, such as home mortgage lending practices, have a substantial influence on fair housing choice. In the public sector, policies and practices can also significantly affect housing choice. Complaint data and AI public involvement feedback further help define problems and possible impediments to housing choice for persons of protected classes and confirm suspected findings from the contextual and supporting data.

The following is a list of findings identified throughout this plan.

DEMOGRAPHICS

Tulsa City population has been increasing only at a rate of 5.8% from 2010 to 2023. Since 2022, the population has decreased marginally by 0.25%. In comparison, Tulsa County has grown 15.79% from 2010 to 2023.

The median age of Tulsa has gone up marginally from 2010 to 2023 to 36.2. The median age is lower than Tulsa County, Oklahoma and National.

The non-white population in Tulsa in 2022 was about 47% of the total population, which is about a 7% increase since 2017.

The Hispanic population has grown significantly throughout the area with an increase of about 40% since 2010.

While the disability rate in Tulsa is lower than the state average of 17.4%, at 16% Tulsa's rate is higher than the national average by about 2.5%.

Nearly 50% of residents over 75 years and over have a disability. This elderly population is likely on a fixed income and may need support to maintain or secure safe and stable housing.

INCOME AND POVERTY

Between 2017 and 2023, there have been increases in all income groups earning \$50,000 or more, while there has been a decrease in income groups earning less than \$50,000. Despite increases, wages aren't keeping up with housing costs.

Between 2017 and 2023, the poverty rate in the City increased by 9.6%. The only age group that saw an increase was those under 18 years old, which is the age group with the highest rate of poverty (27%). The age ranges of 18 to 64 years and those aged 65 years or older saw decreases in poverty rate.

EMPLOYMENT AND EDUCATION

While COVID-19 caused a large dip in the number of people employed, those numbers are now higher than they were prior to COVID-19 and the highest they have been since 2020.

The unemployment rate in Tulsa has remained close to the statewide unemployment rate since 2000. The City's northwest tracts have higher rates of unemployment, which are also where the racially or ethnically concentrated areas of poverty (R/ECAPs) are located.

The Native Hawaiian and Other Pacific Islander group has the highest unemployment rate at 27.4%, which is significantly higher than any other racial or ethnic group. The Black or African American community has an unemployment rate of 10.2%, which is more than double that of the White population (4.8%).

Tulsa has a slightly higher percentage of people with less than a 9th-grade education (5.5%) compared to Oklahoma (3.8%). However, Tulsa has a more educated population overall, with a greater percentage of individuals holding bachelor's and graduate degrees.

In 2023, the Oklahoma Employment Security Commission (OESC) published *The Tulsa MSA Local Briefing –2023*. The Asian population has the highest percentage of bachelor's degree or higher (40%), followed by the White population (32%). Those who identify as "some other race" (18%), Hispanic or Latino population (13%), and Black or African American (12%) populations have the highest percentages of people without a high school diploma.

ACCESS TO OPPORTUNITY

Transportation

For moderate-income households, or those earning 60% of the area median income, housing and transportation costs take up a larger share of their income compared to the city average. While these expenses account for approximately 45% of total income in Tulsa, they rise to 54% for moderate-income households.

The vast majority (75.4%) of Tulsa workers commute alone in a car, truck, or van. This highlights the city's strong reliance on personal vehicles for transportation.

Overall more workers commute into the City (156,224) for work than commute out (64,019). With a high number of people commuting into the City for work, there is a higher probability of increased traffic congestion, highlighting the importance of increased and expanded public transit options.

Neighborhood Necessities

Medically underserved areas are concentrated north of downtown Tulsa, particularly around Tulsa International Airport and extending further north. There are also concentrations of MUA's in the northwest part of the City and in the southwest corner. Many tracts with higher uninsured rates correlate with areas identified as Medically Underserved Areas (MUA) suggesting a strong relationship between lack of health insurance and limited healthcare access.

LSA's are areas where residents have difficulty accessing full-service grocery stores or supermarkets based on factors like distance to the nearest grocery store, availability of transportation, and socioeconomic conditions. There is a concentration of LSA's in west Tulsa.

HOUSING

Housing Stock

In Tulsa, about 125,306 units were built prior to 1980, which is approximately 65% of the total housing stock.

The total number of permits issued rose sharply from 3,268 in 2018 to a peak of 5,182 in 2021, followed by a decline in 2022–2023, and a modest rise in 2024 (4,113 permits). The overall average PPU has increased steadily from \$667,344 in 2018 to \$955,923 in 2024—a 43% increase over the 7-year period.

5+ unit permits, which reflect multifamily developments, show significant growth beginning in 2019, peaking in 2023 with 1,463 permits. This indicates a growing trend toward higher-density residential development, likely due to increasing demand for affordable and rental housing.

Despite some fluctuations, 1-unit permits remain a dominant share of the total, indicating consistent demand for single-family homes.

Housing Costs

Both the median home value and the median contract rent increased significantly between 2017 and 2023. The median home value increased by 47% and was at \$189,600 by 2023, and the median contract rent increased by 27.3% and was at \$998 by 2023.

The cost of housing was identified as the top barrier to housing choice amongst community meeting attendees, and stakeholders have indicated that housing cost has contributed to an increase of homelessness in Tulsa.

Mortgage Lending

The top three application denial reasons within the city were debt-to-income ratio (33.18%), Credit History (27.09%) and Collateral (14.56%), representing about 75% of the city's total denials.

White applicants were less likely to be denied relative to Blacks and Hispanics. Additionally, Black and Hispanic applicants were the most likely to be denied relative to other groups.

High income black and Hispanic loan applicants are more likely to be denied than low-income white applicants.

FAIR HOUSING CONCERNS

The analysis revealed that disability followed by familial status are by far the most cited bases for complaints with disability cited in 50% of the bases across all complaints and familial status cited at a rate of about 27.1%. Other bases cited include race (14.6%), retaliation (14.5%), sex (14.5%), national origin (4.2%), and color (4.2%). The table below shows how many times each basis was cited and in what year each was filed between 2021 and 2024.

Legal aid advocates noted that there has been an influx of refugees coming into Tulsa, particularly Burmese and Afghan refugees. There is a lack of available interpretation services to help them fill out rental applications and they are having to pay larger deposits and rental insurance as a result of having no prior rental history or employment.

Source of income is not a protected class in Oklahoma or Tulsa. Stakeholders and residents indicated that residents with Section 8 vouchers often have a difficult time finding landlords who will accept Section 8 payments. In the online community survey, source of income was the top basis of discrimination cited by those who said they had experienced or heard of others who had experienced discrimination in their housing search.

Most respondents to the online survey were not aware of or were unsure if they were aware of any fair housing or anti-discrimination education opportunities in their community (58%), and the majority of them (54%), have never participated in any kind of educational opportunity.

SECTION X. IMPEDIMENTS AND SUGGESTED ACTIONS

Impediments

The purpose of fair housing planning and analysis is to foster a careful examination of factors which restrict fair housing choices. A review of the data, research, public outreach and other information collected from a wide range of sources assists in identifying impediments and developing a greater understanding of the conditions that affect fair housing choice for the residents of Tulsa, and in particular for the City's protected classes and special needs populations. Such data included census data, fair housing complaints, lending and foreclosure, legal statutes, barriers to affordable housing and public input through surveys and forums.

HUD provides a definition of impediments to fair housing choice as:

Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin which restrict housing choices, or the availability of housing choices (and)

Any actions, omissions, or decisions which have this effect.

The impediments to fair housing choice identified as a result of this Analysis of Impediments are summarized along with the actions in the chart below.

Actions

It is the goal of the City to undertake actions that can help reduce and eliminate existing housing discrimination and prevent its reemergence in the future, as well as address other impediments to equal housing opportunity. While the City cannot control systemic issues related to fair housing and fair housing choice challenges, it can work to coordinate actions that improve fair housing, encourage coordination among disparate public entities, encourage stakeholders to act and report on fair housing issues, analyze existing data sources, report progress on fair housing issues, highlight findings from data analyses, and encourage meaningful action and cooperation at community levels.

Given these constraints, the City will undertake actions each year aimed at addressing fair access to housing and fairness of housing choices for residents. These may include some of the actions outlined below, or other actions that may be subsequently identified as relevant and potentially effective in combating and eliminating the identified impediments to fair housing choice. Specific ongoing activities and community partners that may support those actions are itemized for continuing efforts as well.

GOAL ONE: PROMOTE FAIR HOUSING PROTECTIONS, ENFORCEMENT, AND EDUCATION THROUGH INTERAGENCY COLLABORATION.

IMPEDIMENTS ADDRESSED:

- *Residents, homebuyers, and landlords could benefit from enhancing education about fair housing protections.*
- *Navigating resources and affordable housing options and barriers to housing like background checks is challenging and prevents residents from accessing housing opportunities. A need exists for better connections to resources, as information is often only available online, leaving out vulnerable populations.*

ACTION 1A:

Support fair housing training and education opportunities throughout the City, specifically for rental properties that will be directed to housing service providers, management companies, and rental residents.

Organizations working in this area:

The Tulsa Area Fair Housing Partnership includes member organizations in the Tulsa area. The mission of the Partnership is to increase the “availability and accessibility of affordable and quality housing for individuals and families” in and around Tulsa, regardless of the race, ethnicity, religion, sex, disability, familial status, or national origin of the person or family seeking housing. The goal of the Partnership is to increase public awareness of fair housing rights, “foster an understanding of why discrimination is harmful”, and to ensure that area residents enjoy their right to fair housing choice. Current members of the Partnership are as follows:

- Legal Aid Services of Oklahoma, Inc.
- Tulsa Health Department
- Tulsa CARES
- City of Tulsa, Fair Housing Committee
- Greater Tulsa Association of Realtors
- U.S. Department of Housing and Urban Development
- Oklahoma Housing Finance Agency
- Housing Solutions
- Tulsa Housing Authority
- Tulsa Remote
- Green Country Habitat for Humanity

- Spirit Bank
- Tulsa Apartment Association

Specific Activities Currently In Progress:

- Tulsa Area Fair Housing Committee supports fair housing training and education. The Commission holds events about fair housing one to two times a year. The events explain fair housing laws and tenant rights and provide resources to teach how to build advocacy skills.
- The Health Department has fair housing trainings that result in a good mix of resident and landlord attendees.
- City Life is a monthly publication that is included as a stuffer in the City of Tulsa utility bill sent out to all customers and has included educational information on tenant fair housing rights.
- The City of Tulsa Compliance Officer is part of the Mayor's Office of Resilience and Equity (MORE) and is charged with promoting enforcement and compliance of many federal, state, and local laws including fair housing laws. Education opportunities are offered through MORE for Tulsa residents.
- Tulsa's Equality Indicators assess housing access for residents, and the City publishes annual reports on progress. Training is provided along with the annual publications so that residents better understand available resources.

ACTION 1B:

Ensure training opportunities for rental residents include information on the Oklahoma Landlord Tenant Act to clearly inform this population on their rights and responsibilities. Ensure these trainings are offered in English and Spanish.

Activities currently underway:

- The City of Tulsa Compliance Officer is part of the Mayor's Office of Resilience and Equity (MORE) and is charged with promoting enforcement and compliance of many federal, state, and local laws including fair housing laws. These are the laws put in place to ensure protection from discrimination for renters and homebuyers; this includes individuals with disabilities and those who live or are associated with them. Education opportunities are offered through MORE for Tulsa residents.
- Tulsa Area Fair Housing Committee supports fair housing training and education. The Commission holds events about fair housing one to two times a year. The events explain fair housing laws and tenant rights and provide resources to teach how to build advocacy skills.

- Tulsa’s Equality Indicators assessing housing access for residents, and the City publishes annual reports on progress. Trainings are provided along with the annual publications so that residents better understand available resources.

ACTION 1C (NEW):

Explore the enhancement of fair housing education materials to include tenant advocacy guidance that will provide easy to understand summaries of tenant rights and information on resources that can help with housing challenges, such as navigating background checks, accessing housing assistance, and reporting housing concerns.

These materials will educate and empower residents in their housing search. Materials should be available in multiple languages both digitally and on paper for those who do not regularly access the internet. The City may consider working with service providers to achieve this goal.

ACTION 1D (NEW):

Explore expanding protections for fair housing through local ordinances including protecting renters from barriers such as sources of income discrimination.

GOAL TWO: CONTINUE TO SUPPORT THE CREATION OF NEW AFFORDABLE HOUSING IN AREAS OF OPPORTUNITIES

IMPEDIMENTS ADDRESSED:

- *The region lacks the number of affordable housing units needed to meet the demands of low to moderate income households.*
- *Increasing rent costs are pushing residents out of communities where they wish to live and where they have connections to support systems and opportunities.*

ACTION 2A:

Coordinate clearance and demolition efforts with homeowner rehabilitation and single-family housing development to improve neighborhoods that currently have a high percentage of vacant and abandoned properties including through initiatives like the Vacant Lot Acquisition Program.

Activities currently underway:

- In the past five years, the Planning and Neighborhoods Department (previously Working in Neighborhoods) has run a clearance and demolition program
- The Mayor's/Council's (3H Task Force) Path to Home Recommendations include the following goal: *Vacant Lot Acquisition Program*: Implement a pilot program with Partner Tulsa to identify and acquire vacant lots prime for housing development where new construction is economically viable. The program will initially focus on smaller infill lots with the goal of addressing properties that are identified on the City's nuisance and/or demolition lists

ACTION 2B:

Continue to implement the affordable housing development strategies included in the 3H Task Force's Path to Home recommendations.

Activities currently underway:

- Residents receiving downpayment assistance through the HOME program are required to attend HUD-approved homebuyer education. Habitat for Humanity offers homebuyer education courses.
- The North Tulsa Forward Program (NTFP) was created by the Be Well Community Development Corporation to support potential and existing homeowners with navigating the entire lifecycle of the homeownership process. The program, which is

available in English and Spanish, will assist individuals seeking to become first-time homebuyers in North Tulsa's District 1. Participants will receive free financial and homebuying education and down payment assistance or closing costs up to \$5,000 towards the purchase of a home with available funding.

- In 2025, the Mayor issued an Executive Order that officially made housing a priority for Tulsa, The Executive Order laid out the steps the City plans to take to meet its housing goals.
 - *Create a Housing Acceleration Team* – The Housing Acceleration Team is tasked with streamlining permitting, inspection, and zoning processes to more efficiently review and approve building permits, inspection requests, and zoning applications. Hilltop Apartments, a 106-unit affordable housing development by the Tulsa Housing Authority, was the team's pilot project. Hilltop will be a fully affordable development with 20 units designated for chronically homeless individuals funded by the City of Tulsa's HOME-ARP funds. The Housing Acceleration Team's goal will be to learn from the process and develop more permanent improvements to all building permit, inspection requests, and zoning applications.
 - *Launch a Housing Permitting Tracker* – The City launched its [Housing Tracker](#), a publicly-available online resource where the issuance of building permits and Certificates of Occupancy will be tracked to help identify the progress the City is making on increasing affordable housing stock.
 - *Launch the Community Builder Program* – The Community Builder Pilot Program encourages housing rehabilitation efforts by partnering with and rewarding developers for their efforts to increase housing stock. This program will assist in turning vacant, abandoned, and blighted properties back into usable housing by eliminating some of the challenges involved in the process. The Community Builder Pilot Program is expected to offer key incentives aimed at allowing builders to streamline approval processes.
 - *Implement the Improve Our Tulsa 3 (IOT3) Housing Fund* – The IOT3 Housing Fund, approved by voters in August 2023, is a \$75 million initiative to improve affordable housing in Tulsa. The City is leveraging public funds with private investment to address the housing shortage through programs like housing grants and investments for development. In December 2025, City Council approved the first distribution of IOT3 Housing Funds in the amount of \$13.7 million for affordable housing grants, revolving housing investments, strategic land acquisition as well as housing preservation and rehab. IOT3 Housing Funds Implementation timeline is available [here](#).

- [Partner Tulsa Affordable Housing Trust Fund](#) is a city-wide fund for the production and preservation of affordable housing to further the City of Tulsa’s mission to create quality housing opportunities for all Tulsans. Through Affordable Housing Trust Fund programs, residents receive the resources they need to move from homelessness to homeownership. The Affordable Housing Trust Fund provides loans and grants through the following programs: affordable housing development loans, homebuyer assistance grants, landlord incentive grants and rental assistance grants. The Fund is capitalized through investments from philanthropic partners and the City.

ACTION 2C:

Provide homebuyer education using HUD approved counselors. Ensure training is available in Spanish and English.

Activity currently underway:

- The City will continue working with Tulsa Habitat for Humanity to provide homebuyer education to prospective homebuyers in its programs.

ACTION 2D (NEW):

Explore ways to monitor the status of affordable housing units at risk of conversion and work proactively with property owners to identify strategies that will allow units to remain affordable to prevent turnover and decrease affordable housing stock.

Activity currently underway:

- The City has developed and will maintain the [City of Tulsa Housing Tracker](#), which provides data on housing units developed, including the types of housing and number of affordable units. This tracker is a useful tool in understanding the number of affordable units available in the City, which will assist in monitoring units at risk of conversion.

GOAL THREE: ADDRESS SOCIO ECONOMIC BARRIERS TO HOUSING ACCESS

IMPEDIMENTS ADDRESSED:

- *Barriers to accessing housing opportunities exist for those with credit history, eviction history, and criminal background concerns.*
- *Lack of economic mobility further intensifies increasing housing cost burden, particularly for renters. In the absence of increased wage rates, workforce development initiatives are needed to assist with upward economic mobility.*

ACTION 3A:

Explore ways to coordinate with local service providers to connect people at risk of eviction or displacement with services that stabilize housing.

Activity currently underway:

- The City launched the Safe Move Tulsa Initiative in 2025 to ensure 300 people are rehoused by July 2026 as part of the goal to reach functional zero homelessness in Tulsa by 2030. Participants in the Safe Move Tulsa Initiative will receive an individualized plan that provides support services for up to one year, which could include health care services, mental health assistance, addiction services, financial literacy services, rental assistance, and other wrap-around supports.

ACTION 3B:

Continuing efforts of the Financial Empowerment Center to support residents with financial counseling, clearing warrants, and achieving economic mobility.

Activity currently underway:

- City of Tulsa's Municipal Courts hosts an annual "Clear Your Warrants" event wherein individuals can clear their warrants and pay any pending fines without fear of arrest. The event can also connect individuals facing financial burdens to the Financial Empowerment Center (FEC) that offers free one-on-one sessions with licensed financial counselors. Upon completion of three sessions, individuals are eligible to receive a waiver of \$250 in court fines and fees.

ACTION 3C:

Continue to work with transit authorities to coordinate future transportation route planning with affordable housing developments that allow greater access to opportunities and improve transit access for people with mobility limitations and extend access for more lower income individuals seeking employment opportunities outside of their neighborhoods.

Activity currently underway:

- The Aero (700) Peoria BRT carries one-third of MetroLink Tulsa's ridership and increased corridor usage by 60%. As of June 2024, MetroLink Tulsa was awarded a grant of approximately \$12 Million from the Rebuilding American Infrastructure with Sustainability and Equity (RAISE) program. This significant federal investment will enable the development of 44 new Bus Rapid Transit (BRT) stations along the historic Route 66 corridor, creating a transformative impact on our public transportation system.

ACTION 3D (NEW):

Work with local lenders to encourage outreach to low-income communities and communities of color to facilitate education and counseling for homeownership opportunities.