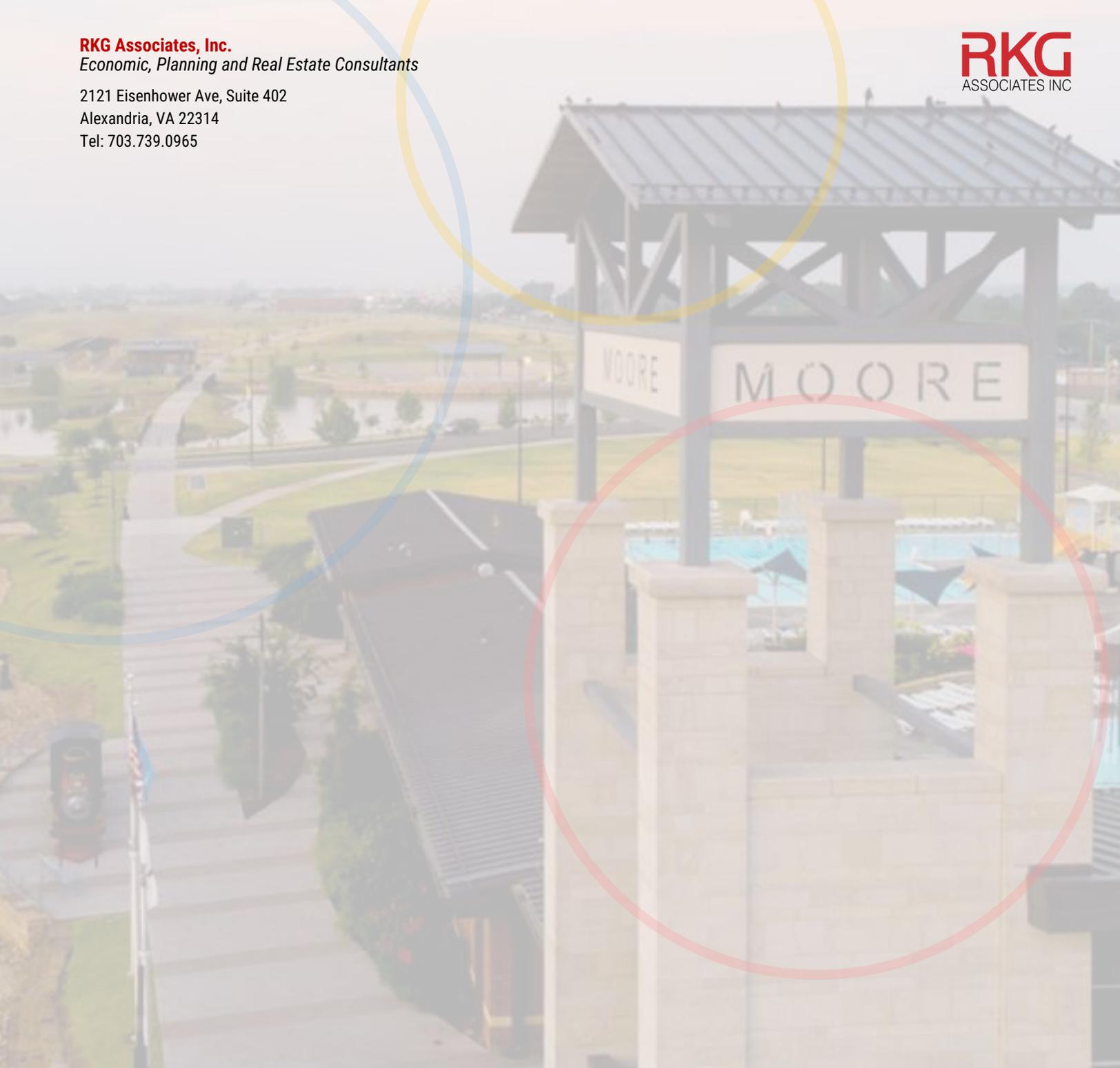


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ASSOCIATES INC



ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

MOORE, OKLAHOMA

July 2025

**Analysis of Impediments to Fair Housing
Choice
Moore, Oklahoma**

July 2025

Prepared for:



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1 INTRODUCTION

The Analysis of Impediments to Fair Housing Choice (AI) is for communities receiving federal housing and community development funds, such as Community Development Block Grant (CDBG) and HOME Investment Partnerships Program (HOME) funding. The AI is a planning document that supports the City's federally required obligation to affirmatively further fair housing by identifying barriers to fair housing choice and recommending strategies to overcome them. The overall goal of the AI is to review and assess impediments to fair housing within Moore, Oklahoma. According to HUD, the impediments to fair housing choice are:

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

Moore's AI was prepared in conjunction with required outreach, consultation, and coordination among various government agencies, private/nonprofit groups, public service agencies, City staff, and individuals. A list of participants in the AI is shown in the following Section 2. A summary of stakeholder interviews is included in Section 7.

The primary federal resource for the City is the Community Development Block Grant (CDBG) program through the U.S. Department of Housing and Urban Development (HUD). The AI consists of seven chapters, including:

1. Introduction
2. Purpose and Need for the Study
3. Demographic and Housing Condition Analysis
4. Records of Housing Discrimination
5. Review of Public Sector Policies
6. Review of Private Sector Practices
7. Impediments to Fair Housing Choice

Though some of the impediments identified in this report are beyond the direct control of Moore, the City bears responsibility for identifying these issues and developing strategies to ensure that its housing market is as open and inclusive as possible. The impediments to fair housing choice identified in this report include the following, explained in detail in Section 7:

- Limited attainable housing options and location choices, coupled with limiting zoning policies
- Limited attainable housing options for people with special needs and those experiencing homelessness,
- Housing condition issues in vulnerable neighborhoods,
- Limited organizational capacity, partnership, local funding, and housing programs,

- Limited access to resources and opportunities for minority populations and in publicly supported housing neighborhoods,
- Barriers to obtaining home mortgage financing for some minority populations in the private sector,
- Lack of public transportation infrastructure, and
- Need for increased fair housing education, including in real estate listing and leasing practices.

2 PURPOSE AND NEED FOR THE STUDY

Title VIII of the Civil Rights Act of 1968 (and its subsequent amendment in 1988) mandates that it is unlawful to discriminate in the sale, rental, or financing of housing or, in the provision of brokerage services or facilities in connection with the sale or rental of housing, based on:

- Race,
- Color,
- Religion,
- National origin,
- Sex,
- Families with children, and
- Persons with disabilities.

The U.S. Department of Housing and Urban Development (HUD) encourages that all recipients of federal funds under the Community Development Block Grant Program (CDBG), HOME Investment Partnership (HOME), Emergency Shelter Grant (ESG), and Housing Opportunities for Persons with AIDS (HOPWA) programs take actions to affirmatively further fair housing. This includes conducting an analysis to identify impediments to fair housing choice within the jurisdiction. Moore receives CDBG funds annually and voluntarily chose to update its Analysis of Impediments to Fair Housing Choice (AI) in support of the HUD-required certification that the City will affirmatively further fair housing (24 CFR 91.225).

The purpose of this study is to conduct an independent Analysis of Impediments (AI) in support of the HUD certification that the City will affirmatively further fair housing (24 CFR 91.225). The City is committed to furthering fair housing choices within the city limits.

A. PREPARATION OF THE ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

The City of Moore's Department of Community Development is the lead agency for the update of the Analysis of Impediments to Fair Housing Choice. The AI was prepared by RKG Associates, Inc., a planning, economic, and real estate consulting firm working on behalf of the City of Moore.

B. PARTICIPANTS IN THE ANALYSIS OF IMPEDIMENTS

The City's Analysis of Impediments to Fair Housing Choice included input from city officials, key persons involved in the housing and community development industry, and affiliated service providers and nonprofit organizations. In conducting the AI, the consultant collaborated with individuals and organizations that represent the interests of protected groups.

Participants included:

- Metropolitan Fair Housing Council of Oklahoma, Inc.,
- Central Oklahoma Community Action Agency,

- Oklahoma Housing Finance Agency,
- Neighborhood Housing Services Oklahoma,
- Belmont Management,
- Cleveland County Continuum of Care, and
- Moore Youth and Family.

C. METHODOLOGY

This analysis includes a combination of quantitative and qualitative research. RKG Associates obtained data from The Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T) developed by the Department of Housing and Urban Development (HUD), 2013 to 2023 American Community Survey 5-Year Estimates (provided by the U.S. Census Bureau), the 2000, 2010, and 2020 Census, the Home Mortgage Disclosure Act (HMDA) Data, and relevant reports published by various local agencies. The qualitative component includes interviews with agency staff and others involved in the provision of fair housing and/or related services in the Moore area.

3 DEMOGRAPHIC AND HOUSING ANALYSIS

A. INTRODUCTION

This section examines Moore’s existing demographic and housing characteristics by census tract on the city level. It uses the categories, indexes, and data from the Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T) developed by the Department of Housing and Urban Development (HUD). The AFFH Data Mapping Tool provides a uniform system for HUD grant recipients to follow in assessing their efforts and the challenges they face in furthering the purposes of the Fair Housing Act.

The following analysis provides an overview and insights into various demographic and housing topics included in the latest AFFH-T raw data. The latest data version used by the RKG team is Version AFFHT0007, dated November 2024. In addition, the analysts supplemented the study with population, racial and ethnic composition, household, and household income data between 2013 and 2023 (the most recent decade available at the time of the study) obtained from the U.S. Census Bureau American Community Survey 2013 and 2023 5-Year Estimates, as well as the Decennial Census.

B. POPULATION, HOUSEHOLDS, AND HOUSEHOLD INCOME TRENDS

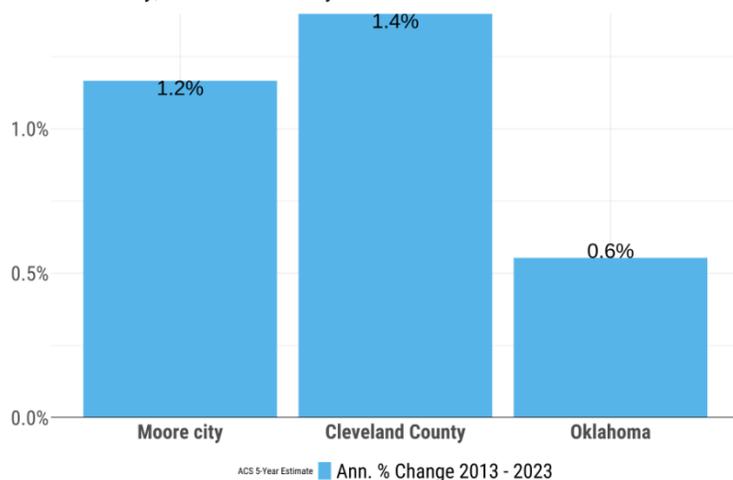
1. Population Trends

Moore’s population was estimated at 63,045 in 2023, accounting for 21.1% of Cleveland County’s population. Moore’s share of Cleveland County’s total population over the decade has remained relatively stable at around 21%, although it has seen a slight decrease since 2013, from 21.6%.

Cleveland County, the State of Oklahoma, and Moore all experienced population growth between 2013 and 2023. Population growth in Moore has been slower than in Cleveland County but faster than in Oklahoma. Moore’s population increased by 1.2% per year, slightly behind the county (1.4%) but nearly twice the state’s growth rate (0.6%) during the decade. This suggests that while Moore experienced modest

Figure 3-1

Annual Percent Change in Total Population 2013 - 2023
Moore City, Cleveland County and Oklahoma State



Source: ACS and RKG Associates, Inc., 2025

population growth between 2013 and 2023, outpacing the state average, it has been growing at a moderate pace relative to the county.

Among the census tracts within and around Moore, those in the central part of the city experienced a population decrease between 2013 and 2023. Census tracts that saw the fastest population growth between 2013 and 2023 are on the southeast and the southwest side of the city, including Census Tracts 2022.01, 2022.03, and 2022.08 (Figure 3-3).

Figure 3-2

Population Trends 2013 - 2023

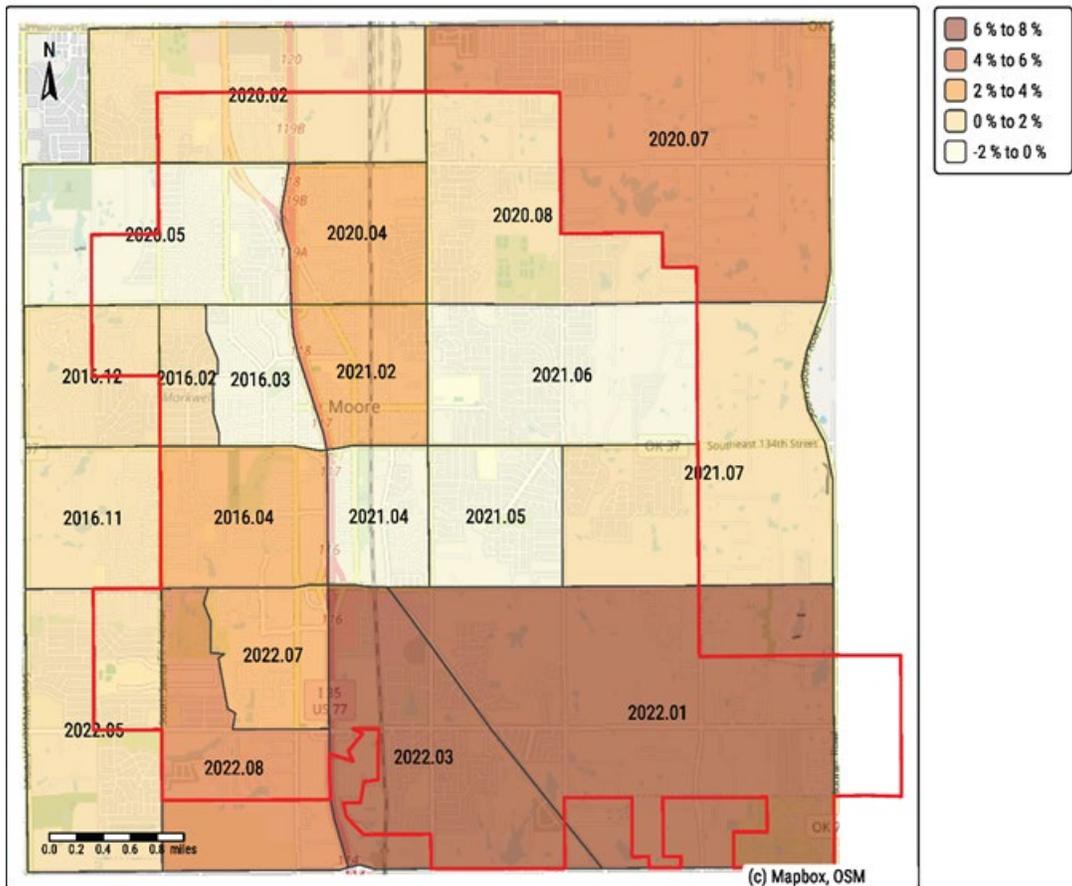
Moore City, Cleveland County and Oklahoma State

	2013	2023	Change 2013 - 2023	
			Actual Change	Ann. % Change
Moore city	56,460	63,045	6,585	1.2%
Cleveland County	261,047	297,545	36,498	1.4%
Oklahoma	3,785,742	3,995,260	209,518	0.6%

Source: ACS 5-Year Estimates, RKG Associates Inc., 2025

Figure 3-3

**Population Annual Percent Change, 2013 - 2023 ACS
Moore City, Oklahoma Census Tracts**

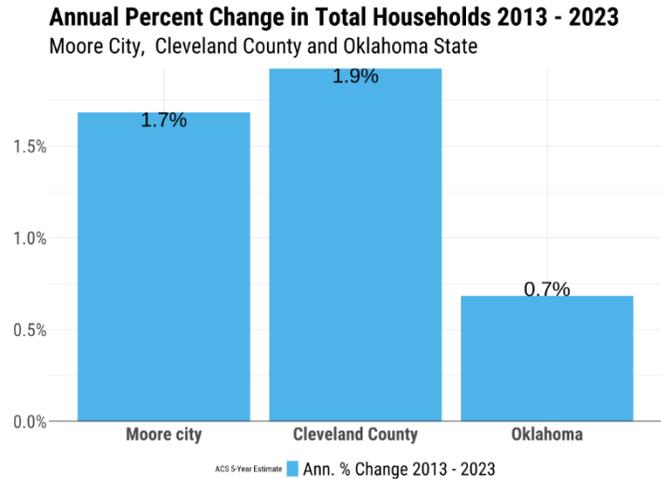


2. Household Trends and Household Size

The household changes between 2013 and 2023 in Moore, Cleveland County, and the State of Oklahoma follow a trend similar to the population growth. The number of households has increased over the decade in Moore, Cleveland County, and the State of Oklahoma, which is a positive trend. Despite the increase, Moore has experienced slower household growth than Cleveland County, but its growth rate remains more than double that of the state (Figure 3-4).

Additionally, the average household size for both Moore and the county has shrunk over the decade, while Moore has a slightly larger average household size (2.6) than the county and the state (2.5) in 2023.

Figure 3-4



Source: ACS, and RKG Associates, Inc., 2025

Figure 3-5

Household Trends 2013 - 2023

Moore City, Cleveland County and Oklahoma State

	Households & Avg. Household Size		Change 2013 - 2023	
	2013	2023	Actual Change	Ann. % Change
Moore city	20,704 2.7	24,188 2.6	3,484	1.7%
Cleveland County	96,701 2.6	115,293 2.5	18,592	1.9%
Oklahoma	1,444,081 2.5	1,542,780 2.5	98,699	0.7%

Source: ACS 5-Year Estimates, RKG Associates Inc., 2025

3. Median Household Income

Moore saw a higher median household income than the county and the state figures between 2013 and 2023. The city’s median household income of \$76,941 in 2023 is 103% of the county level and 120% of the state level. However, the city’s annual median household income growth has fallen slightly behind both the county and the state during the same decade (Figure 3-6). This is likely associated with Moore’s slower population gains compared to the county and the state during this period.

Figure 3-6

Median Household Incomes 2013 - 2023

Moore City, Cleveland County and Oklahoma State

	2013	2023	Change 2013 - 2023	
			Actual Change	Ann. % Change
Moore city	\$57,294	\$76,941	\$19,647	3.4%
Cleveland County	\$54,989	\$74,446	\$19,457	3.5%
Oklahoma	\$45,339	\$63,603	\$18,264	4.0%

Source: ACS 5-Year Estimates, RKG Associates Inc., 2025

Between 2013 and 2023, Moore has seen a faster population growth in its higher-income neighborhoods on the southeastern side (Census Tract 2022.01), while the northwestern part of the city, which has lower median household incomes, has seen a population loss during the same decade. Census Tracts 2021.07, 2022.01 on the eastern and southeastern sides of the city have the highest median household income in 2023. In comparison, the median household income in 2023 was the lowest in the northwestern part of the city, specifically in Census Tracts 2016.02, 2016.03, and 2021.02. However, note that the fastest gains in median household incomes between 2013 and 2023 also occurred in this part of the city, especially in Census Tracts 2021.02, 2020.04, and 2020.05. Note also that 2023 median household income data was not reported for Census Tract 2022.07, which is primarily composed of commercial properties, with just one residential subdivision and one apartment complex (Figure 3-7, Figure 3-8).

If the income growth is primarily due to the in-migration of higher-income households and out-migration of lower-income residents, it could signal early-stage gentrification. Conversely, if the income gains are driven by existing residents earning more through improved employment opportunities, education, or upward mobility, the trend reflects a positive transformation.

Figure 3-7
Median Household Income, 2023 ACS
Moore City, Oklahoma Census Tracts

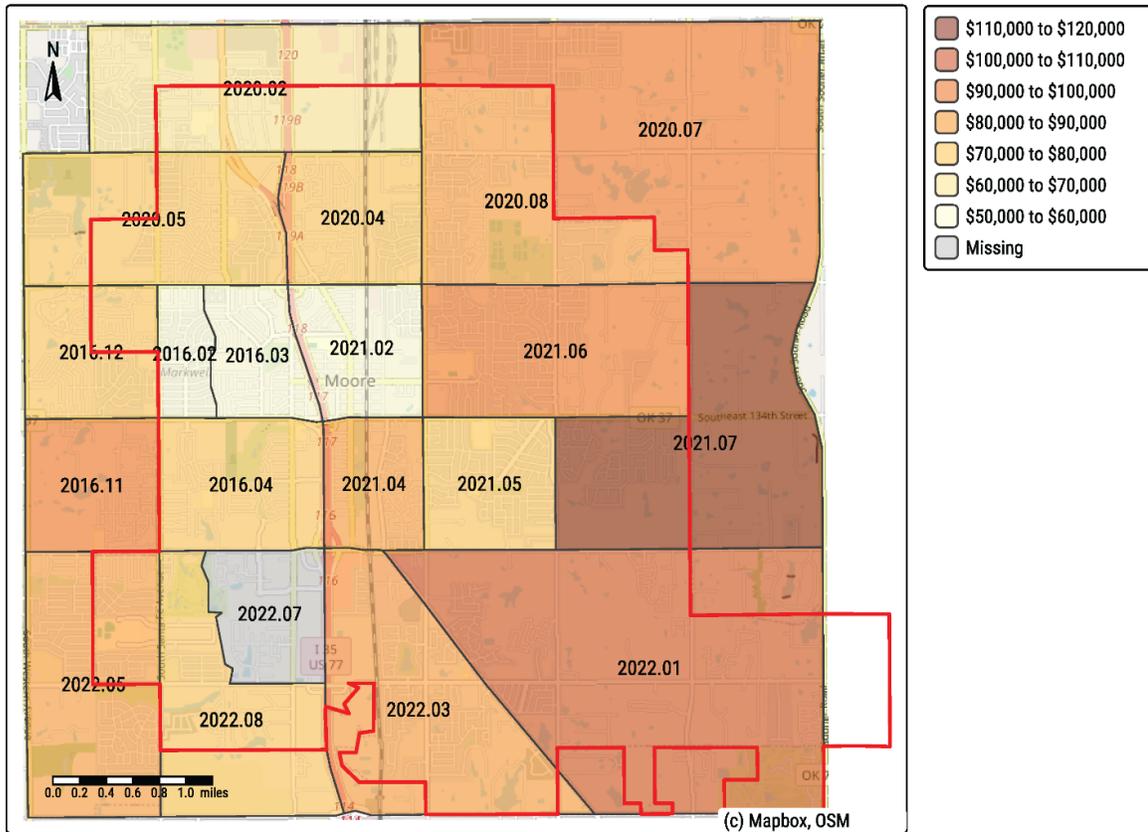
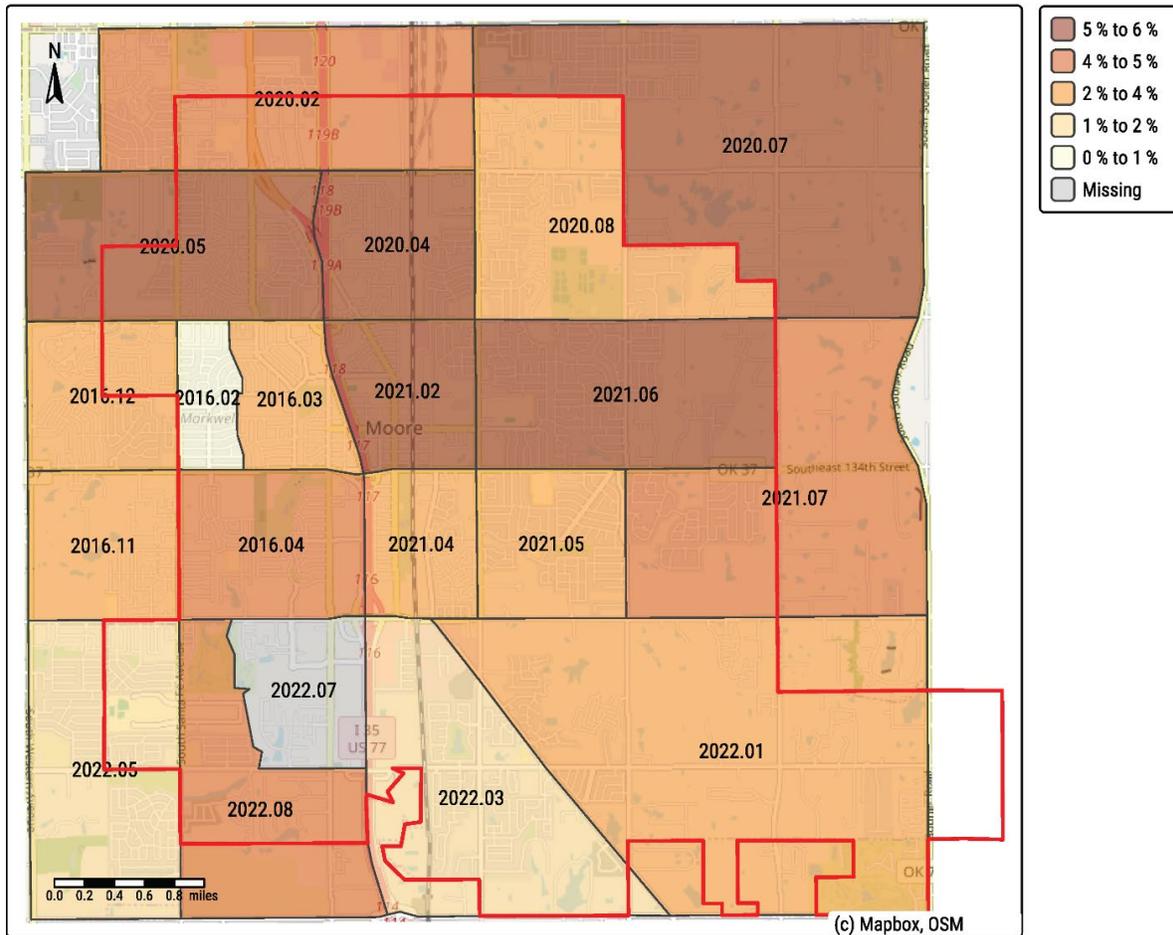


Figure 3-8

**Median Household Income Annual Percent Change, 2013 - 2023 ACS
Moore City, Oklahoma Census Tracts**

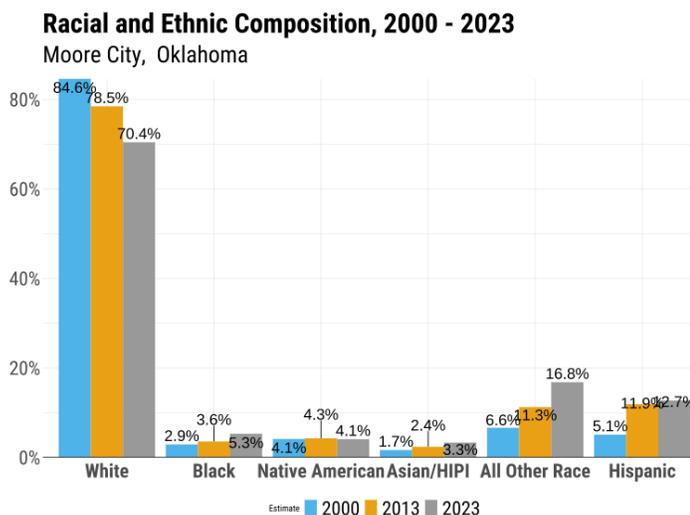


C. RACE AND ETHNICITY

1. Racial/Ethnic Trends and Composition

Moore has been diversifying in terms of its racial and ethnic composition since 2000, with the shares of almost all non-White racial/ethnic groups increasing. In 2023, more than 70% of the city's population identified as White. Among the non-White population groups, the "All Other Race" population is the largest group, accounting for 16.8% of the total Moore population in 2023. This is followed by the African American population (5.3%). The Hispanic population accounted for 12.7% in 2023 (Figure 3-9). Between 2013 and 2023, the "All Other Race" group also grew the fastest by 6.7% per year, followed by the Black (6.5%) and the Asian/Native Hawaiian/Other Pacific Islander populations (5.5%) (Figure 3-10).

Figure 3-9



Source: ACS and RKG Associates, Inc., 2025

It should be noted that the term "Hispanic" does not refer to a racial group. The U.S. Census Bureau uses the ethnonyms "Hispanic or Latino" to refer to

Figure 3-10

Racial and Ethnic Composition Trends 2000 - 2023

Moore City, Oklahoma

	2000		2013		2023		Change 2000 - 2013		Change 2013 - 2023	
	Count	%	Count	%	Count	%	Actual Chg.	Ann. % Chg.	Actual Chg.	Ann. % Chg.
White	34,814	84.6%	44,311	78.5%	44,413	70.4%	9,497	2.1%	102	0.0%
Black	1,201	2.9%	2,024	3.6%	3,348	5.3%	823	5.3%	1,324	6.5%
Native American	1,704	4.1%	2,418	4.3%	2,581	4.1%	714	3.2%	163	0.7%
Asian/HIPI	687	1.7%	1,353	2.4%	2,100	3.3%	666	7.5%	747	5.5%
All Other Race	2,732	6.6%	6,354	11.3%	10,603	16.8%	3,622	10.2%	4,249	6.7%
Hispanic	2,098	5.1%	6,722	11.9%	8,028	12.7%	4,624	17.0%	1,306	1.9%
All Minority	6,324	15.4%	12,149	21.5%	18,632	29.6%	5,825	7.1%	6,483	5.3%

Source: Decennial Census, ACS 5-Year Estimates, RKG Associates Inc., 2025

"a person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race," and states that Hispanics or Latinos can be of any race, any ancestry, any ethnicity¹.

2. Racial/Ethnic Concentration

Federal regulations at Title 24 CFR 91.210(a)(3) "Housing Market Analysis" require grantees of HUD Community Planning and Development programs to identify and describe any areas within their jurisdictions that have concentrations of racial/ethnic minorities and/or low-income families. HUD currently leaves the determination of thresholds defining "concentrations" to each local grantee.

The approach currently applied by HUD's Office of Policy Development and Research calls for an evaluation of population distribution in two primary categories: White, which includes any census respondent who identifies as White and non-Hispanic, and minority, which includes any respondent identifying as a member of a non-White racial group or Hispanic ethnicity. Hispanic White people would be in the latter category.

RKG defined concentrations of minority or Hispanic populations as census tracts with non-White or Hispanic populations greater than 150% of the city-wide percentage of the combined minority or Hispanic population. For example, if the Hispanic population equaled 14.3% of the city's population in 2023, then census tracts with Hispanic population shares of 21.5% or greater would be classified as a concentration.

There were no minority or Hispanic clusters as defined by RKG in Moore in 2000. This means Moore was less racially and ethnically concentrated in 2000.

In 2023, the minority population concentration can be seen in the northwestern part of the city in Census Tract 2020.05. (Figure 3-11). The Hispanic population also clustered in the northwestern part of the city in Census Tracts 2016.02, 2016.03, 2021.04, 2016.12, and 2020.02 (Figure 3-11, Figure 3-12).

Note that the northwestern side of the city has concentrations of both the Hispanic and minority populations in 2023, especially along the I-35 corridor. These areas generally overlap with neighborhoods with lower household incomes and slow annual population gains, and even a population loss between 2013 and 2023. However, note that the minority-concentrated census tract 2020.05 also experienced some of the fastest median household income growth during the same decade.

¹ <https://www.census.gov/topics/population/hispanic-origin/about.html>

Figure 3-11
Minority Population Concentration, 2023 ACS
Moore City, Oklahoma Census Tracts

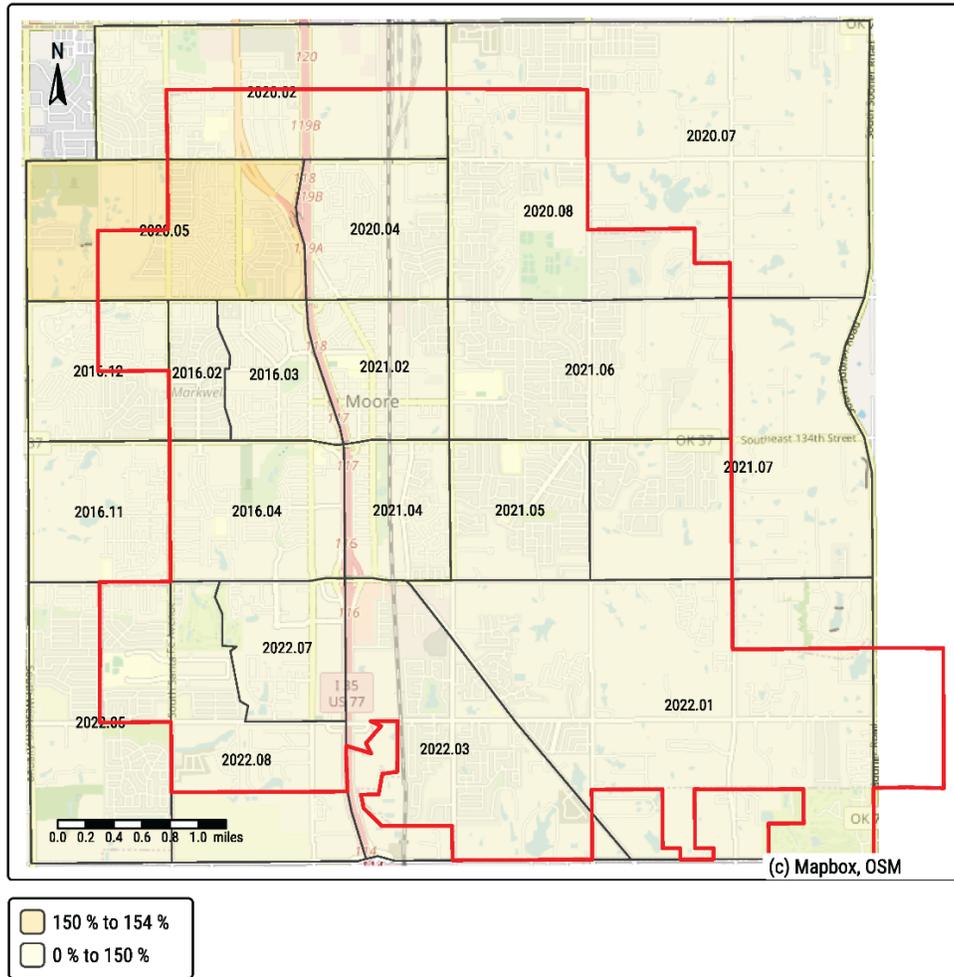
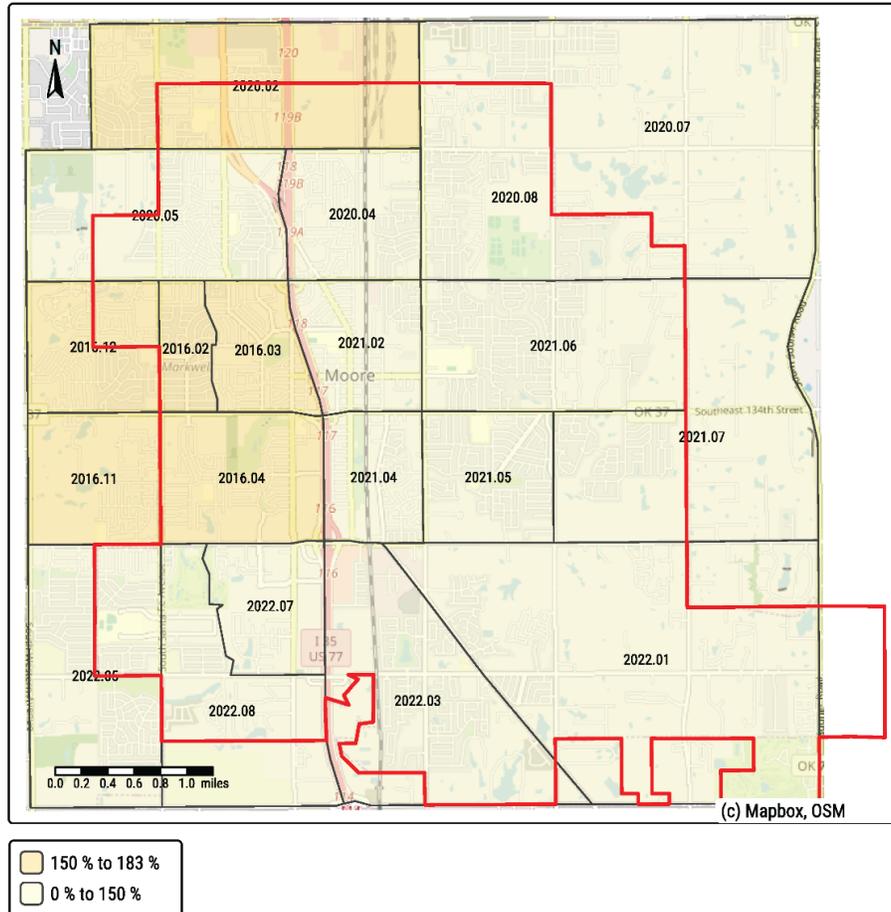


Figure 3-12
Hispanic Population Concentration, 2023 ACS
Moore City, Oklahoma Census Tracts



D. POVERTY AND RACIALLY/ETHNICALLY CONCENTRATED AREAS OF POVERTY (R/ECAPS)

HUD defines that a neighborhood can be a R/ECAP if it

- 1) Has a non-White population of 50 percent or more, and
- 2) Has a poverty rate that exceeds 40% or is three or more times the average tract-level poverty rate for the metropolitan/micropolitan area, whichever threshold is lower.

Moore had no R/ECAP in 2023. This is because, though some census tracts meet the non-White population rate test, none of the tracts have a poverty rate that exceeds 40% or is three or more times the average for the metropolitan/micropolitan area, according to American Community Survey data. However, the census tracts that are closest to being R/ECAPs are Census Tracts 2020.05, 2016.04, and 2021.02. These census tracts are generally on the northwestern sides of Moore, overlapping with the minority- and Hispanic-concentrated areas.

E. RACIAL/ETHNIC DISSIMILARITIES

Another factor related to the geographic distribution of racial and ethnic groups within a jurisdiction is the Racial Dissimilarity Index included in the HUD AFFH-T database. According to HUD’s definition, “the dissimilarity index represents the extent to which the distribution of any two groups (frequently racial or ethnic groups) differs across census tracts or block groups.” In other words, the Index measures how much one racial/ethnic group is spatially separated from another within a jurisdiction. The data for each racial/ethnic group is presented in comparison to the White segment of Moore’s population.

Figure 3-13

Dissimilarity Index by Race/Ethnicity 2000-2020			
Moore City, Oklahoma			
	2000	2010	2020
Non-White/White	7.19	6.75	7.00
Black/White	16.85	14.05	9.09
Hispanic/White	6.97	11.59	10.98
Asian/Pacific Islander/White	23.93	21.28	20.43

Source: HUD AFFH Data Version AFFHT0007, RKG Associates Inc., 2025

The Dissimilarity Index has values between 0 and 100, with a score of 0 representing perfect integration and a value of 100 corresponding with total segregation. A Dissimilarity Index below 40 represents low segregation, a value between 40 and 55 suggests moderate segregation, and a score above 55 indicates high segregation.

All the Dissimilarity Index values for Moore in 2020 are below 25, indicating low segregation between racial and ethnic minority groups and the White population. The segregation level between the non-White and White populations was the lowest in 2020, while segregation between the Asian and White populations remained the highest compared to other groups over the decades. In addition, the Black/White Dissimilarity Index dropped from 16.85 in 2000 to 9.09 in 2020, indicating a notable reduction in racial segregation between these groups.

The segregation levels between 2000, 2010, and 2020 have generally decreased, except for between the Hispanic and White populations. This shows that although segregation levels are relatively low and have improved over time in Moore, some disparities still exist, particularly for the Asian and Hispanic communities, showing that the City should monitor this trend carefully to mitigate the risk of growing racial and ethnic segregation (Figure 3-13).

F. PLACE OF NATIONAL ORIGIN

According to the definition of the U.S. Census Bureau, the foreign-born population includes anyone who is not a U.S. citizen at birth, including those who become U.S. citizens through naturalization. Limited English Proficiency is used to refer to a person who is not fluent in the English language, often because English is not their native language. Understanding the foreign-born population and people with limited English proficiency is important for identifying the impediments to fair housing choice as well as associated solutions in Moore, as these population groups often have more limited fair housing options, usually due to cultural and language barriers.

The 2016 to 2020 5-Year Estimates based on the American Community Survey is the most current data series from HUD for the place of national origin data. According to the HUD AFFH data, the largest foreign-born group in Moore is from Mexico, followed by Western Africa and Vietnam. Apart from English, the most populous language in the city is Spanish, followed by Vietnamese and Chinese (Figure 3-14, Figure 3-15).

Figure 3-14

Limited English Proficiency Persons by Top 5 Most Populous Languages

Moore City, Oklahoma (ACS 2016 - 2020)

Population with Limited English Proficiency	Count	% of Total Population
Spanish	708	1.2%
Vietnamese	170	0.3%
Chinese	151	0.3%
Korean	133	0.2%
Other & Unspecified language	46	0.1%

Source: HUD AFFH Data Version AFFHT0007, RIG Associates Inc. 2025

Figure 3-15

Population by Top 5 Most Populous National Origin Groups

Moore City, Oklahoma (ACS 2016 - 2020)

Foreign-Born Population	Count	% of Total Population
Mexico	836	1.4%
Western Africa	359	0.6%
Vietnam	343	0.6%
Other Central America	261	0.4%
China excl. Taiwan	192	0.3%

Source: HUD AFFH Data Version AFFHT0007, RIG Associates Inc. 2025

G. DISABILITY BY TYPE AND AGE GROUP

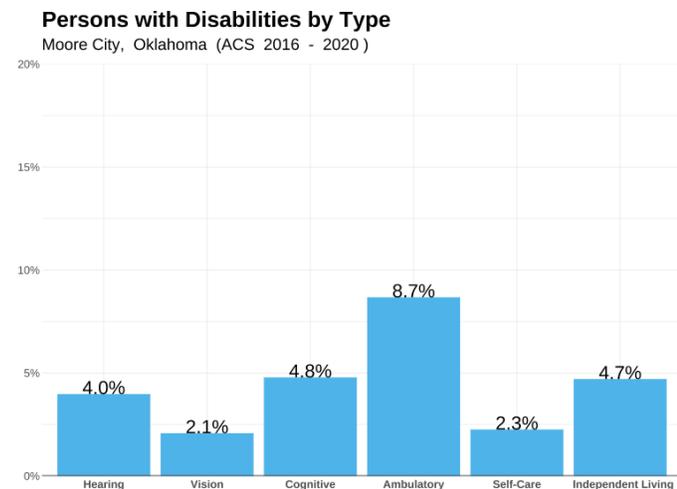
The Americans with Disabilities Act (ADA) defines a person with a disability as “a person who has a physical or mental impairment that substantially limits one or more major life activities.” People with disabilities may face more barriers to fair housing options as they often need special physical accommodations in their housing and are more likely to experience housing discrimination.

The disability rate in Moore is relatively low. In total, Moore has approximately 9,032 people with disabilities. Ambulatory difficulty is the most common type of disability for Moore residents, with 8.7% of people experiencing challenges walking, followed by people with cognitive difficulties (4.8%). Note that a person may have multiple types of disabilities and may, therefore, be counted in more than one disability category (Figure 3-16).

Across all census tracts, Tract 21.02 has the highest rate of ambulatory difficulty (27.8%), followed by Tract 21.06 at 14.1%. Meanwhile, Census Tract 16.12 has the highest percentage of cognitive difficulty, which stands at 11.7%. In addition, residents in Census Tract 21.02, 16.12 are more likely to face multiple types of disabilities, with more than or equal to three types present. These census tracts are generally in the central and northwestern part of the city, close to I-35, which has several assisted living facilities and senior housing developments nearby. Most people with disabilities in Moore are residents aged 18-64 (7.7%), followed by seniors aged 65 and above (6.6%), according to the HUD AFFH data (Figure 3-17).

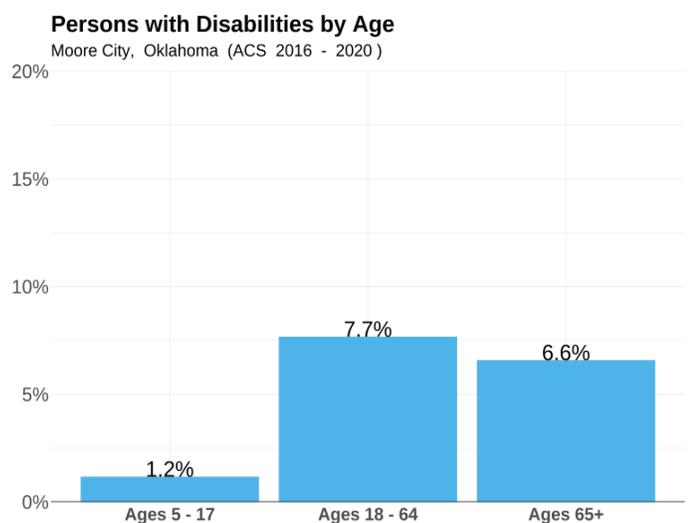
In addition, one interviewee pointed out that most senior living facilities are in areas with a higher concentration of elderly residents, which makes it easier for organizations to provide targeted assistance and services. However, these services are currently limited. The City should strengthen its support for and partnerships with service providers and expand place-based

Figure 3-16



Source: HUD AFFH Data Version AFFHT0007 and RKG Associates.

Figure 3-17



Source: HUD AFFH Data Version AFFHT0007 and RKG Associates, Inc., 2025

strategies for seniors and residents with disabilities, such as accessibility modifications, medical assistance, expanded paratransit, and door-to-door transportation, particularly in areas with higher shares of senior residents and people with disabilities.

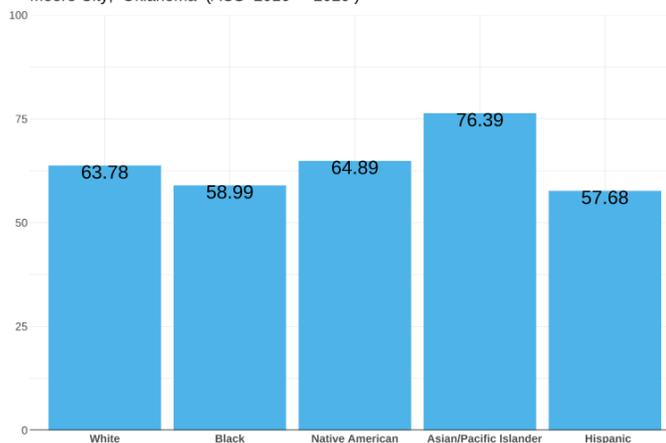
H. POVERTY INDEX

The poverty level of the population within a jurisdiction is often associated with how easily the community can access opportunities and resources, including housing. If a community is exposed to high levels of poverty, then the residents may encounter more barriers to fair and affordable housing options. For example, a person living below the poverty level would likely not qualify for a mortgage loan due to lower income levels. HUD’s Low Poverty Index uses family poverty rates (based on the federal poverty line) to measure a community’s exposure to poverty. The Low Poverty Index has scores ranging from 0 to 100, with a higher value representing less exposure to poverty in a neighborhood.

Within Moore, the Low Poverty Index scores of the different racial and ethnic groups all fall into the medium-to-high range, a rise in scores from the previous AI, reflecting a generally lower exposure to poverty. However, racial and ethnic disparities exist. The Asian/Pacific Islander population, with the highest score of 76.39, has the least exposure to poverty, followed by Native Americans (64.89) and the White population (63.78). In contrast, the Hispanic population, with a score of 57.68, has the most notable exposure to poverty compared to other racial/ethnic groups in the city. This is followed by the African American population (58.99) (Figure 3-18).

Figure 3-18

Low Poverty Index by Race/Ethnicity
Moore City, Oklahoma (ACS 2016 - 2020)



Source: HUD AFFH Data Version AFFHT0007 and RKG Associates, Inc., 2025

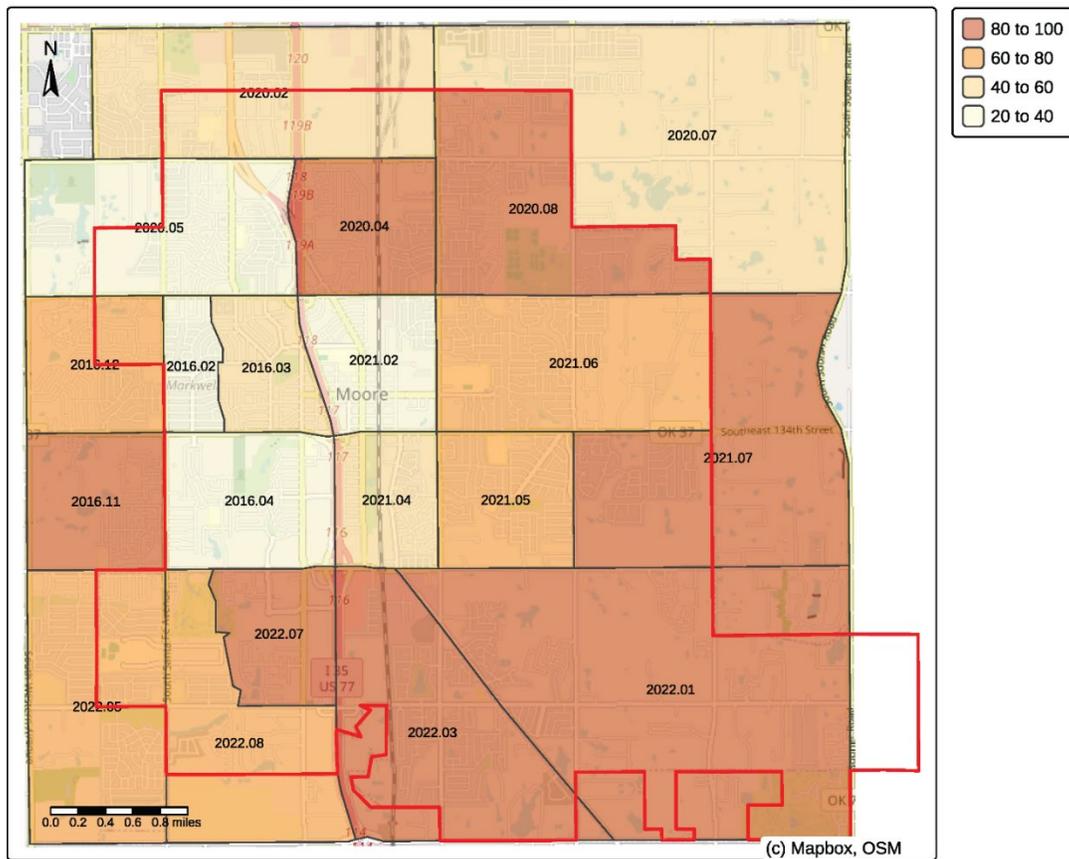
There is a clear geographic disparity in poverty levels across Moore. Census tracts with the lowest scores—indicating higher exposure to poverty—are primarily concentrated in the northwestern part of the city, particularly in Census Tracts 2020.05, 2016.02, 2016.03, 2016.04, and 2021.02. These areas also overlap with neighborhoods that have higher concentrations of minority and Hispanic residents, as discussed above, suggesting a link between race/ethnicity and socioeconomic vulnerability.

This spatial pattern aligns closely with the 2023 median household income distribution across the city. Census tracts 2016.02, 2016.04, and 2021.02 report some of the lowest median household incomes in the city, aligning with their higher poverty exposure. Furthermore, Census Tracts 2020.05 and 2016.03 have also experienced population decline between 2013 and 2023, which may indicate economic stress or displacement pressures. Also, according to the American Community Survey (ACS) 5-Year Estimates, the Hispanic population in Moore has a poverty rate of 17.0% in 2023, notably higher than most other racial and ethnic

groups. This finding is consistent with earlier analyses showing that Hispanic-concentrated neighborhoods generally face more significant exposure to poverty relative to other parts of the city (see Figure 3-19).

These findings underscore the importance of place-based and culturally responsive policy interventions to address the intersections of race, income, and geographic disparity in Moore’s most vulnerable communities on the northwest side.

Figure 3-19
Low Poverty Index (ACS 2016 - 2020)
Moore City, Oklahoma Census Tracts



I. SCHOOL PROFICIENCY INDEX

School proficiency is an indicator of the quality of the education available to a given community. Higher education quality is usually associated with better access to opportunities and higher income in addition to a higher quality of life. HUD’s School Proficiency Index is based on the test scores of elementary schools within an area and measures which neighborhoods have high-performing elementary schools nearby. The values of the index range from 0 to 100, with higher scores indicating higher school system quality in a community.

The School Proficiency Index follows a similar pattern to the findings from the previous AI, with the current Index showing an increase in scores—indicating an improvement over the years. While the School Proficiency Index scores for different racial and ethnic groups in Moore generally fall within the medium to high

range, disparities in access to quality education still exist among these groups. These differences in educational outcomes tend to align with the variations seen in Low Poverty Index scores across racial and ethnic groups. For example, the Hispanic population has the lowest School Proficiency Index score of 61.90, in addition to the greatest exposure to poverty. This is followed by the Black and the Native American populations, which have comparatively less access to quality education compared to other racial groups (Figure 3-20).

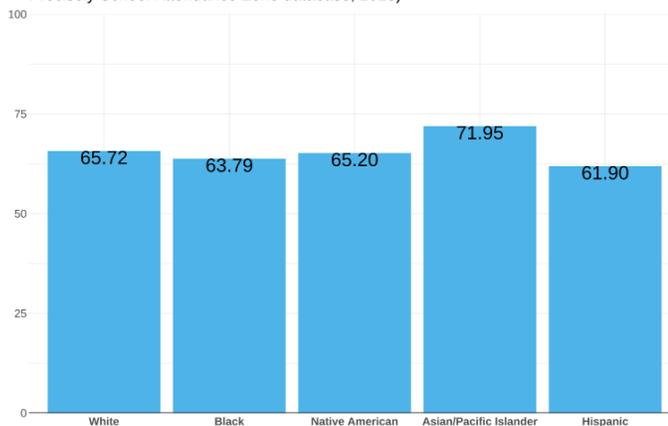
The School Proficiency Index values were then mapped by block groups in the city, with darker colors indicating higher values and thus better school performances (Figure 3-21). The lowest-performing census tracts in terms of school proficiency (below a value of 25) tend to be in the central and northwestern parts of the city, where there is also a concentration of the minority and Hispanic populations, lower median household incomes, and higher exposure to poverty.

According to Google Maps, elementary schools in Moore are primarily clustered in the central and northwestern areas of the city. When census tracts have fewer schools but higher School Proficiency Index scores, it most likely means that their residents attend nearby high-performing schools. Conversely, tracts with lower index scores often contain underperforming schools, highlighting the impact of broader socioeconomic challenges such as poverty and limited resources. To improve educational quality across the city, the City should pursue a collaborative strategy that addresses both academic performance and

Figure 3-20

School Proficiency Index by Race/Ethnicity

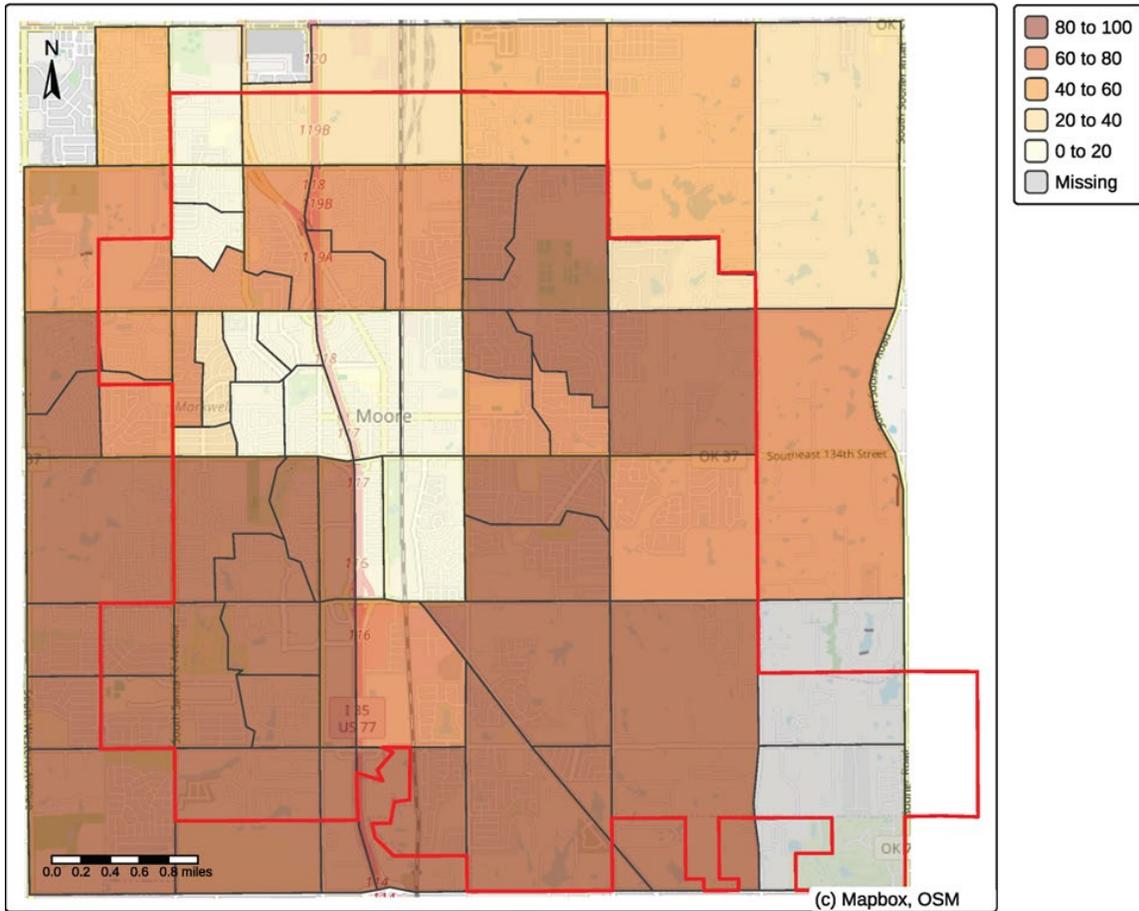
Moore City, Oklahoma (Great Schools 2019, 2023-2022;
Precisely School Attendance Zone database, 2023)



Source: HUD AFFH Data Version AFFHT0007 and RKG Associates, Inc., 2025

underlying community needs, such as housing, through partnerships with local schools, community organizations, and service providers.

Figure 3-21
School Proficiency Index
Moore City, Oklahoma Block Groups



J. JOB PROXIMITY INDEX

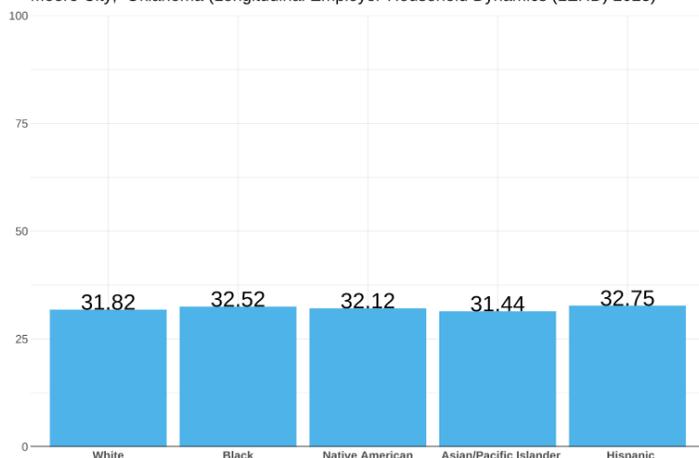
HUD measures a community's access to employment opportunities with the Job Proximity Index and Labor Market Engagement Index. The Job Proximity Index quantifies the distance between a given block group and employment centers within a Core Based Statistical Area (CBSA). The index values range from 0 to 100, with higher scores indicating better access to job opportunities for residents in a neighborhood.

Figure 3-22 shows that Job Proximity Index scores, which were above 40 in the previous Analysis of Impediments (AI), have declined to slightly above 30 for all groups. This indicates reduced access to nearby employment opportunities across the board.

Figure 3-22

Job Proximity Index by Race/Ethnicity

Moore City, Oklahoma (Longitudinal Employer-Household Dynamics (LEHD) 2023)



Source: HUD AFFH Data Version AFFHT0007 and RKG Associates, Inc., 2025

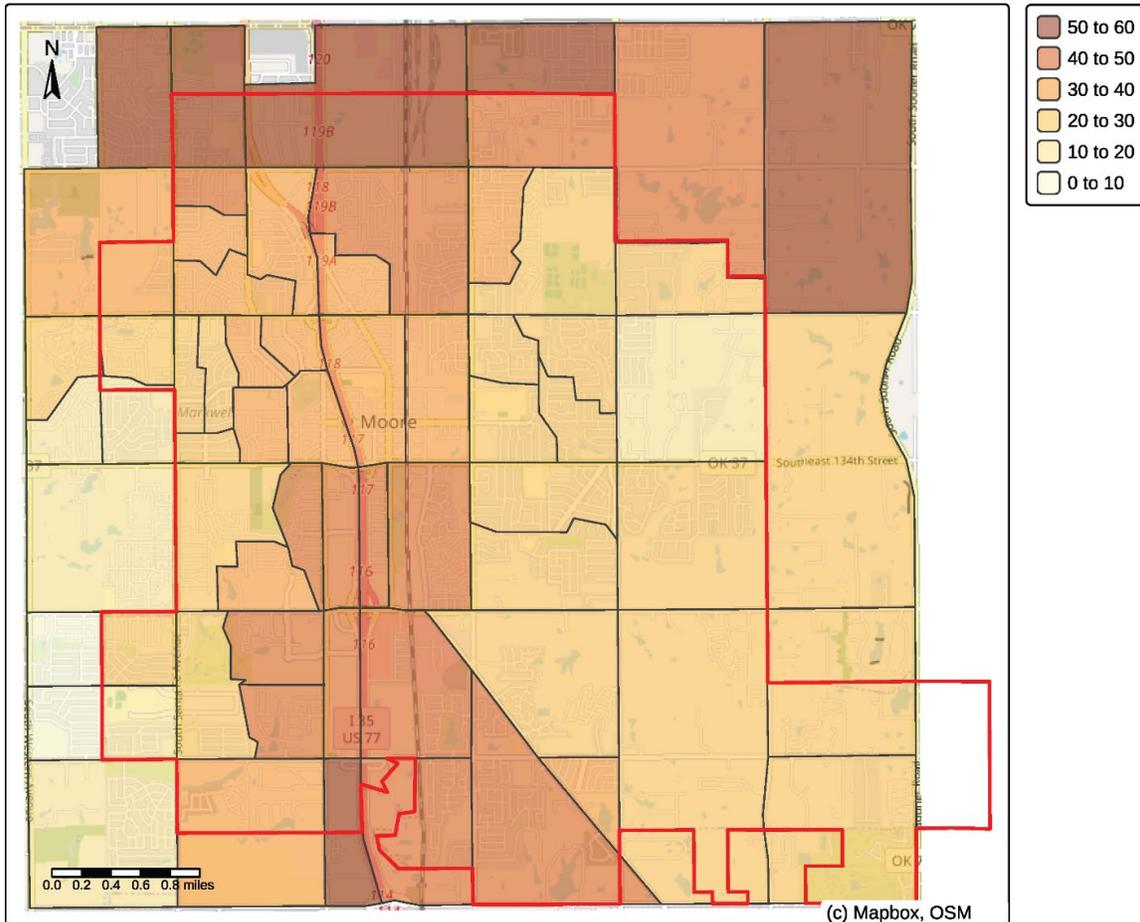
All racial and ethnic groups have very close Job Proximity Index scores in Moore. The Hispanic population has the highest job proximity score at 32.75, suggesting closer residence to job centers. In contrast, the Asian/Pacific Islander population has the lowest score at 31.44, despite having higher income levels and strong school proficiency. This may reflect the growing trend of remote work in high-paying fields such as information technology, which are expanding in and around Moore.

The Job Proximity Index map further illustrates these patterns (Figure 3-23). Neighborhoods along the I-35 corridor, especially in the central and southwestern parts of the city, have higher index values. This correlates with the stronger presence of businesses and major employers in these areas, such as restaurants, hotels, hospitals like Moore EMSSTAT and Moore Emergency Hospital, and Randall University, providing localized employment opportunities. Central-northwest Moore, which has a significant presence of the Hispanic population, also shows job proximity scores above 30. In contrast, the central and southeastern neighborhoods, with higher household income, have lower job proximity scores, likely due to a higher prevalence of remote work.

According to U.S. Census Bureau's Longitudinal Employer-Household Dynamics (LEHD) program, more than 85% of Moore's working residents are employed outside the city. Common job destinations include Oklahoma City, Norman, Midwest City, Edmond, and Tulsa. This heavy out-commuting pattern likely contributes to Moore's overall low job access scores. Areas just north of Moore's city boundary also show higher job proximity scores, further emphasizing the strong regional employment pull from outside of the city, aligning with findings from OnTheMap.

Figure 3-23

Jobs Proximity Index (Longitudinal Employer-Household Dynamics (LEHD) 2023)
Moore City, Oklahoma Block Groups



K. LABOR MARKET ENGAGEMENT INDEX

In addition to the proximity to job centers, HUD also measures a neighborhood’s job access with the Labor Market Engagement Index, which, according to HUD’s description, “provides a summary description of the relative intensity of labor market engagement and human capital in a neighborhood.” The Index is based on the unemployment rate, labor force participation rate, and educational attainment data. This is because access to employment opportunities is influenced by more than just distance; it also depends on the types of jobs available and whether their educational and skill requirements align with the qualifications of residents. The index values range from 0 to 100, with higher scores representing higher labor force participation, human capital, and economic vitality in the community. Low Labor Market Engagement Index scores often reflect deeper issues like limited job opportunities, low education or skill levels, long-term poverty, or even systemic barriers like transportation or discrimination.

Similar to the Low Poverty Index, there is a disparity among racial/ethnic groups in terms of labor market engagement and human capital. The city's Asian/Pacific Islander population has the highest Labor Market Engagement Index score of 66.02 (although they have the lowest Job Proximity Index), followed by the Native American population (59.19) and the White population (56.67). Compared to the previous AI, Asian/Pacific Islanders remain the highest in labor market engagement, Native Americans have moved into second place, and Black residents are now lagging behind with one of the lowest score. This suggests that these racial groups have the closest match between the local jobs and the people who access those jobs.

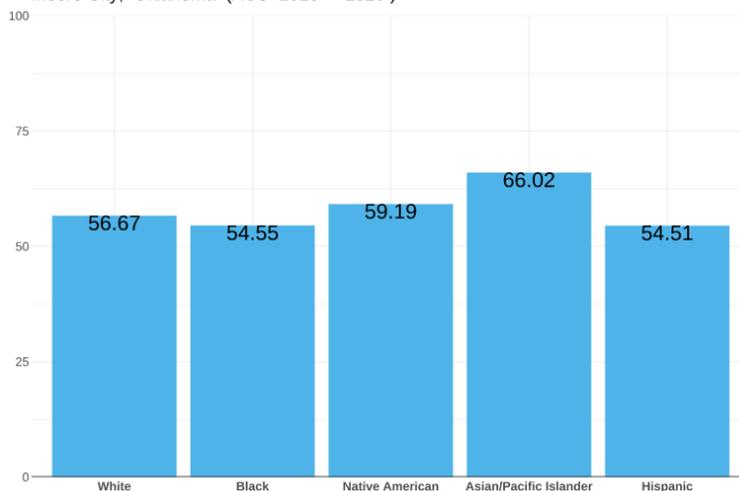
The Hispanic population has the lowest score of 54.51 (although they have the highest Job Proximity Index), indicating lower levels of engagement in the labor market compared to other groups. This is followed by the African American population at 54.55 (Figure 3-24). This indicates that, though Hispanic and African American residents often live near places with high job opportunities, they are not participating in the workforce at the same rate as other groups. This outcome aligns with these groups lower levels of elementary school proficiency and higher exposure to poverty, as discussed earlier.

Labor Market Engagement Index values by census tract vary throughout the city, with darker colors indicating higher levels of labor market engagement and human capital and, therefore, better access to employment opportunities in a neighborhood. Census Tracts in the southern part of Moore, especially the southwestern corner (Tracts 2022.07 and 2022.08), have the highest labor market engagement. The lowest engagement can be seen in the northwestern part of the city in Census Tracts 2020.02, 2020.04, 2021.02, and 2016.02. Note that Tracts 2020.02 and 2016.02 also overlap with Hispanic-concentrated neighborhoods with lower household incomes, lower school proficiency, and higher exposure to poverty (Figure 3-25).

Figure 3-24

Labor Market Index by Race/Ethnicity

Moore City, Oklahoma (ACS 2016 - 2020)



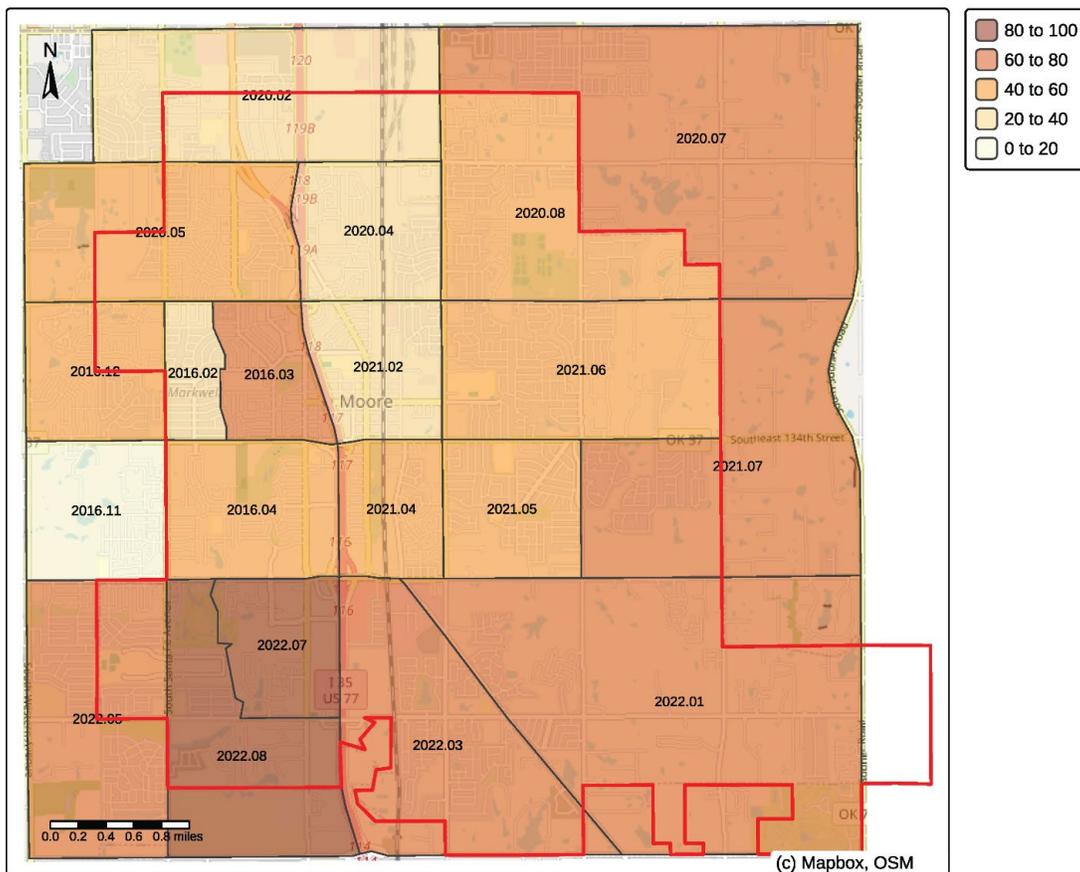
Source: HUD AFFH Data Version AFFHT0007 and RKG Associates, Inc., 2025

Note that proximity to jobs does not necessarily translate into more economic opportunities. The higher levels of job proximity and lower degrees of labor market engagement among the Hispanic and African American populations in Moore may indicate either a generally low labor force participation or a concentration of employment in lower-wage sectors close to their residences, such as the service or hospitality industries. This pattern is consistent with earlier findings of lower school proficiency and higher poverty exposure among these populations, highlighting the interconnected nature of educational attainment, job quality, and socioeconomic opportunity.

To address labor market disparities and improve access to fair housing options throughout the city, such as housing with easy access to quality jobs and amenities, the City should consider implementing a place-

based strategy focused on the northwestern side of Moore. This approach could include targeted investments in job training and adult education, improvements to transportation infrastructure to connect residents more effectively with employment centers, expanded childcare services, and economic development incentives to attract businesses offering quality jobs. Additionally, given the lower school proficiency levels in these neighborhoods, the City should prioritize improving the quality of local schools in the northwestern part of the city. Enhancing equitable access to these resources is essential to advancing fair housing choices.

Figure 3-25
Labor Market Engagement Index (ACS 2016 - 2020)
Moore City, Oklahoma Census Tracts



L. TRANSIT TRIP INDEX

According to HUD, the Transit Trip Index is not provided in the AFFH Data Version AFFHT0007 due to the lack of reliable source data

M. LOW TRANSPORTATION COST INDEX

According to HUD, the Low Transportation Cost Index is not provided in the AFFH Data Version AFFHT0007 due to the lack of reliable source data.

N. ENVIRONMENTAL HEALTH INDEX

HUD also measures the environmental quality of neighborhoods with the Environmental Health Index. The index measures exposure to toxins harmful to human health at a neighborhood level. It is based on the U.S. Environmental Protection Agency (EPA) estimates of the air quality by neighborhood and only measures issues related to air quality, and no other factors impacting human health. The Environmental Health Index has values ranging from 0 to 100, with higher scores representing less exposure to harmful toxins and, therefore, better environmental quality of a neighborhood.

Compared to the previous AI, where Environmental Health Index scores ranged from 45 to 48 between different racial groups, the current scores in Moore have dropped to between 33 and 36, indicating low to moderate environmental health across all racial and ethnic groups (Figure 3-26). This decline suggests a notable deterioration in environmental health conditions, potentially indicating increased exposure to environmental hazards or reduced access to clean air, water, or other environmental resources for all groups

Among the racial groups, the Native American population has the lowest Environmental Health Index score of 33.78, followed by the Hispanic population (33.86). This indicates that these two groups are more likely to reside in neighborhoods with lower air quality in Moore. On the other hand, the Asian population and the White population have relatively higher scores.

Environmental Health Index scores are generally consistent across Moore, with the exception of the southwestern area, specifically Census Tracts 2022.07 and 2022.08, which stand out for their higher environmental health quality (Figure 3-27) and the highest Labor Market Engagement Index scores. Although Census Tract 2022.07 is primarily commercial, it includes one upscale residential subdivision and an apartment complex. Its proximity to the expansive outdoor golf course at the Moore Golf and Athletic Club, located in neighboring Census Tract 2022.08, may contribute to the area's favorable environmental conditions. The primary environmental health factor in most communities is automobile emissions, particularly in urban areas where traffic volumes and congestion are typically higher.

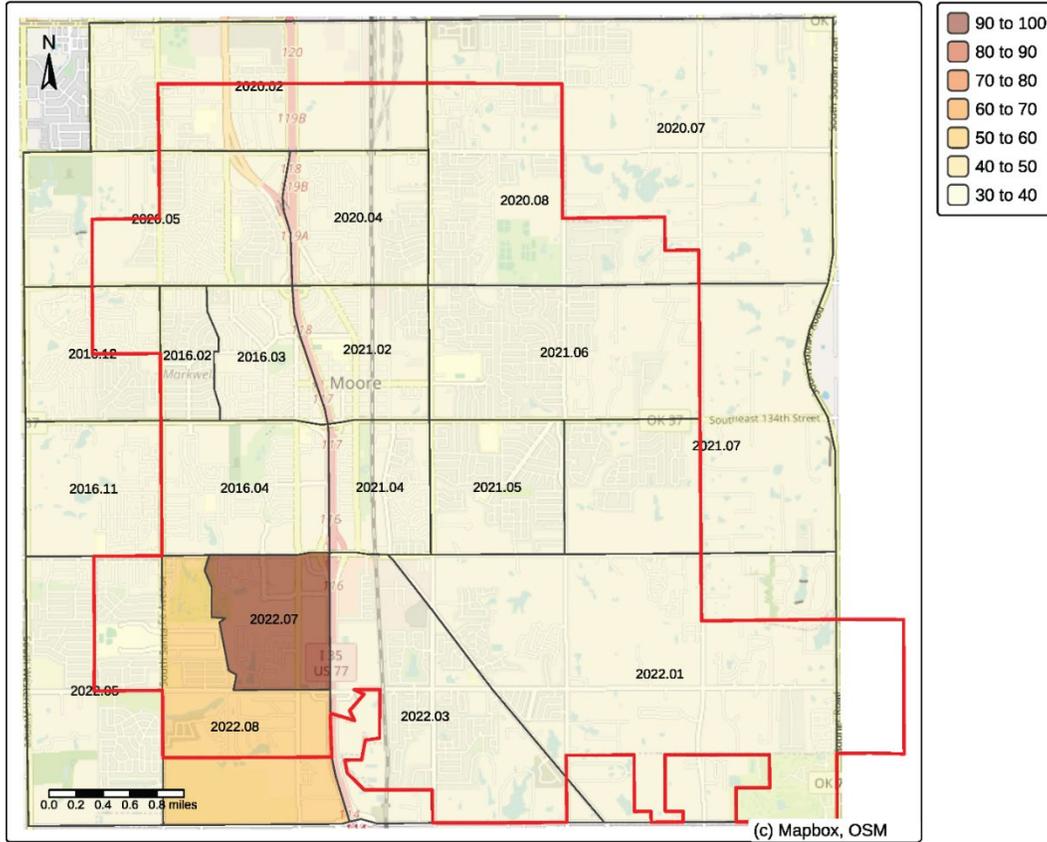
Figure 3-26

Environmental Health Index by Race/Ethnicity
Moore City, Oklahoma (EPA 2019 with 2020 GEO Codes)



Source: HUD AFFH Data Version AFFHT0007 and RKG Associates, Inc., 2025

Figure 3-27
Environmental Health Index (EPA 2019 with 2020 GEO Codes)
Moore City, Oklahoma Census Tracts



O. HOUSING TENURE

The HUD AFFH system utilizes CHAS 2016 to 2020 data to analyze neighborhood housing conditions and problems. The consultants also complement the analysis with housing tenure data from the 2023 American Community Survey (ACS) 5-Year Estimates. One indicator to examine existing housing stability in Moore is the homeownership rate by racial/ethnic groups. As purchasing a home is the biggest investment most people will make in their lifetime, when property values appreciate, homeowners can accumulate asset value and household wealth at the same time. Therefore, a higher homeownership rate is usually associated with more household wealth and stability. Historically, minority racial groups tend to have lower homeownership rates than White households in the U.S.

This generally holds true; however, in Moore, as of 2023, homeownership rates for all racial and ethnic groups, except for the White population and the Native American population, remain higher than in Cleveland County and Oklahoma.

The Native American population in Moore experienced a notable decline in homeownership between 2018 and 2023. In comparison, the Asian population (81.9%) has the highest ownership rate in Moore in 2023, followed by the Black population (70.9%) and the White population (69.5%).

Figure 3-28

Ownership Rate by Race/Ethnicity 2018 - 2023

Moore City, Cleveland County, Oklahoma

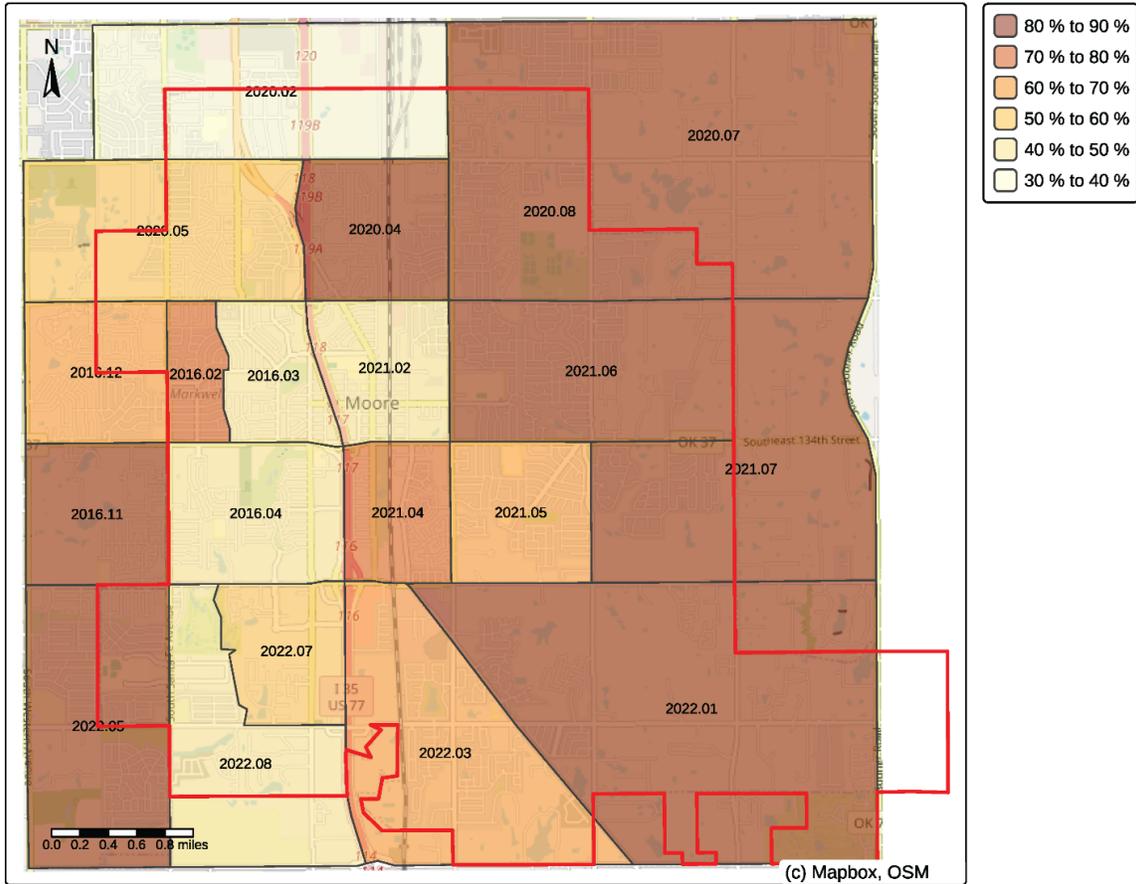
	2018			2023		
	Moore city	Cleveland County	Oklahoma	Moore city	Cleveland County	Oklahoma
White	70.9%	66.5%	69.6%	69.5%	66.7%	70.2%
Black	55.2%	33.7%	38.0%	70.9%	41.2%	38.9%
Native American	76.4%	61.6%	62.7%	52.1%	63.8%	62.7%
Asian/HIPI	73.9%	59.5%	56.5%	81.9%	61.3%	60.4%
All Other Race	53.3%	57.2%	55.8%	62.5%	56.2%	58.4%
Hispanic	60.6%	56.1%	51.8%	60.6%	55.8%	54.5%

Source: Decennial Census, ACS 5-Year Estimates, RKG Associates Inc., 2025

The data suggests positive improvements in homeownership among many minority populations in Moore between 2018 and 2023 compared to the rest of the county and state. However, the declining ownership rates for both the Native American and White populations during the same period signal fewer homeownership opportunities or declining preference to purchase homes in the city for these groups. This is likely associated with Moore's slower population growth between 2013 and 2023, and potential outmigration of certain groups (Figure 3-28). Higher ownership rates are found in the city's eastern parts. On the other hand, Census Tracts 2020.02, 2020.05, 2016.03, 2021.02, and 2016.04, which are in and around neighborhoods with

concentrations of the Hispanic and minority populations, lower median income households, and more limited access to quality education and jobs, have some of the lowest homeownership rates (Figure 3-29).

Figure 3-29
Owner Household Percent (CHAS 2016-2020)
Moore City, Oklahoma Census Tracts



P. LOCATION OF AFFORDABLE RENTAL HOUSING

The quantity of affordable rental housing units within a city is a key measure of the accessibility of fair housing options. Affordable rental units, as defined by AFFH, are those with rents at or below 30% of the income for a household earning 50% of the Area Median Income (AMI) within a given jurisdiction. According to the HUD AFFH data, among all the rental units in Moore, merely 28.7%, or 2,853 units, are classified as affordable units (Figure 3-30).

Figure 3-30

Affordable Rental Units (CHAS 2016-2020)

Moore City, Oklahoma

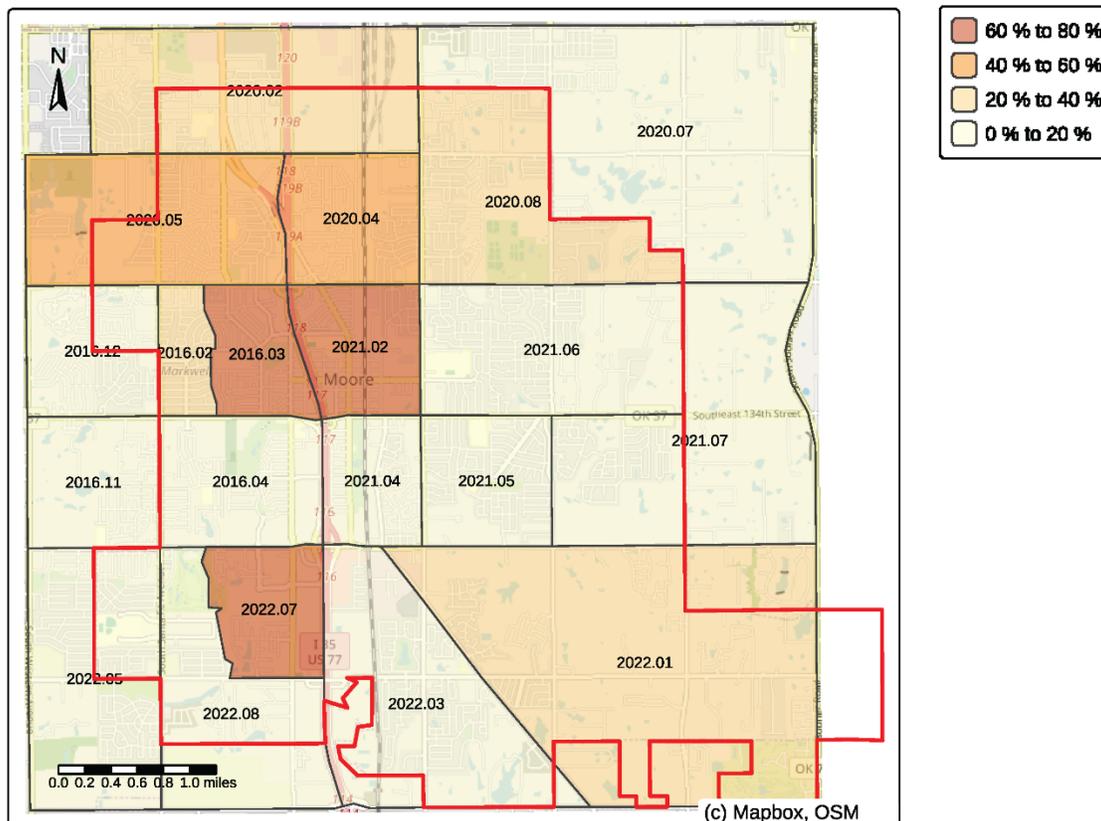
	Count	Percent
Total Renter Units	9,935	100.0%
Total Affordable Renter Units	2,853	28.7%

Source: HUD AFFH Data Version AFFHT0007, RKG Associates Inc., 2025

Census Tracts 2016.03, 2021.02, 2020.05, and 2022.07 have the highest share of rental units that are categorized as affordable. They are primarily in the northwestern part of the city, overlapping with areas with concentrations of the minority and Hispanic populations, lower incomes, lower levels of school quality and labor market engagement, and lower

Figure 3-31

Percentage of Rental Units That are Affordable (CHAS 2016-2020)
Moore City, Oklahoma Census Tracts



homeownership rates. The data suggests that affordable rental options are concentrated mostly in the northwestern side of Moore, which may have limited fair access to housing options and socioeconomic opportunities in other parts of the city (Figure 3-31).

Q. PUBLICLY SUPPORTED HOUSING AND RACE/ETHNICITY

Moore has a total of approximately 593 publicly assisted housing units, including 213 units categorized under Section 8/ Section 202/ LMSA, 370 units funded by the Low-Income Housing Tax Credit (LIHTC), and 10 units from HOME-funded projects (Figure 3-32). Note that Moore does not have a housing authority, and the city does not have public housing projects. The Oklahoma Housing Finance Agency (OHFA) administers the Section 8 Housing Choice Voucher Program (HCV) in Moore, providing rental assistance to low-income residents. In addition, OHFA supports affordable housing across the state through programs such as the Low-Income Housing Tax Credit, homebuyer assistance initiatives, and funding for housing targeted to special populations, including seniors, veterans, and people with disabilities.

Figure 3-32
Active Publicly Assisted Housing Projects
Moore, Oklahoma

	Target Tenant Type	Total Units	Earliest Expiration Year
Section 8/Section 202/LMSA		213	
Nottingham Square	Family	162	2029
Langley Village Apartments	Elderly	51	2036
Low Income Housing Tax Credit Projects (LIHTC)		370	
Forest Village Estate	Elderly or disabled	34	2036
Lyons Estates	Family	92	2035
The Curve	Family	244	2040
HOME Funded Projects		10	
Moore Rental Phase II Location2	NA	1	2036
Moore Rental Phase II Regency	NA	1	2035
Moore Rental Phase I Cottonwood	NA	1	2035
Moore Rental Phase II	NA	1	2036
1044 NW 6th St	NA	1	2037
1112 NE 25th St	NA	1	2041
401 S Avery St	NA	1	2041
510 NE 18th St	NA	1	2037
624 N Dillon Ave	NA	1	2037
729 NE 18th St	NA	1	2041
Total		593	

Source: National Housing Preservation Database, and RKG Associates, Inc., 2025

OHFA reports that 387 households are actively using Section 8 vouchers in the Moore area (Figure 3-33), yet publicly assisted housing data lists only 213 Section 8 units (Figure 3-32). This difference reflects how the HCV program administered by OFHA functions: participants are issued a voucher and can search for housing anywhere in Oklahoma, except in jurisdictions like Norman, Shawnee, and Stillwater. The 387 households actively participating in Section 8 found landlords in Moore willing to accept vouchers. These units may be located in apartment complexes such as Nottingham Square, Forest Estates, and Lyons Estates, or in single-family homes. Note that among the HOME-funded units in Moore (Figure 3-32), only those at 1112 NE 25th Street and 729 NE 18th Street are administered by OHFA. Both of these properties also have tenants who participate in the Section 8 Housing Choice Voucher (HCV) program. It is up to the participant to locate a qualifying unit, and the housing does not need to be in a property formally designated as “Section 8.”

The Curve is a 244-unit affordable housing development in Moore that opened in 2021 under LIHTC. Located at SW 17th Street and Janeway Avenue, the project includes 220 tax credit units and 24 market-rate units, with unit sizes ranging from efficiency to three bedrooms. Built on the site of a former mobile home park destroyed by the 2013 EF5 tornado, the development was supported by approximately \$16 million in HUD CDBG-DR funds provided by the City. The Curve offers a range of amenities and represents a significant investment in affordable housing and disaster recovery in Moore.

Additionally, some properties categorized under Section 8 in Figure 3-32 are actually funded through other HUD programs, such as the Section 202 Supportive Housing for the Elderly and the Loan Management Set-Aside (LMSA) program. While these are distinct from the HCV program, they provide project-based rental assistance under Section 8 authority, and are often grouped under the broader “Section 8” category in national housing databases such as the National Housing Preservation Database (NHPD).

The consultants also obtained data on households participating in Moore's Section 8 Housing Choice Voucher (HCV) program from the Oklahoma Housing Finance Agency. It is important to note that some households include household members from multiple racial or ethnic groups. As a result, a single household may be counted multiple times under the "Race/Ethnicity" category. Therefore, the sum of the figures under this category exceeds the overall unique household counts (387). Consequently, percentages for the "Race/Ethnicity" category are not calculated. The following provides a count of households by household members' racial/ethnic groups:

- 185 households have White members
- 222 households have Black or African American members
- 26 households have American Indian or Alaska Native members
- 2 households have an Asian member
- 1 household has Native Hawaiian or Other Pacific Islander members
- 37 households have Hispanic/ Latino members

This data highlights the racial and ethnic diversity among households participating in the HCV program in Moore. Note that more households with Black members are actively participating in the HCV program, followed by households with White members. In addition, most HCV program households occupy two-bedroom units (36.4%), followed by one-bedroom units (25.8%). Around 63% of the participating households live in smaller units with two or fewer bedrooms. Larger units (four bedrooms or more) account for about 13% of the total. In addition, over half (54.8%) of the households have household members with disabilities, and 54 households are elderly households. Most (63.8%) HCV participating households in Moore are households of families. (Figure 3-33).

The data indicate that family households and households with members with disabilities are most likely more vulnerable, with limited affordable and accessible housing options at market rates outside the HCV program in Moore.

Figure 3-33
HCV Participant Composition
Moore, Oklahoma

	Count	Percent
Total Active Participating Households	387	100.0%
Persons by Race/Ethnicity		
White Members	185	NA
Black/African American Members	222	NA
American Indian/Alaska Native Members	26	NA
Asian Members	2	NA
Native Hawaiian/ Oth Pacific Islander Members	1	NA
Other Members	0	NA
Hispanic/Latino Members	37	NA
Households by Rent		
Rent \$0 to \$100	114	29.5%
Rent \$101 to \$200	58	15.0%
Rent \$201 to \$300	92	23.8%
Rent \$301 to \$400	37	9.6%
Rent \$401 and above	86	22.2%
Households by Bedroom Type		
Studio	3	0.8%
1 Bedroom	100	25.8%
2 Bedrooms	141	36.4%
3 Bedrooms	90	23.3%
4 Bedrooms	42	10.9%
5 Bedrooms	8	2.1%
6 Bedrooms	1	0.3%
Households by Type		
Singles	140	36.2%
Families	247	63.8%
Households by Disability and Elderly Status		
Disabled	212	54.8%
Elderly (62+)	54	14.0%

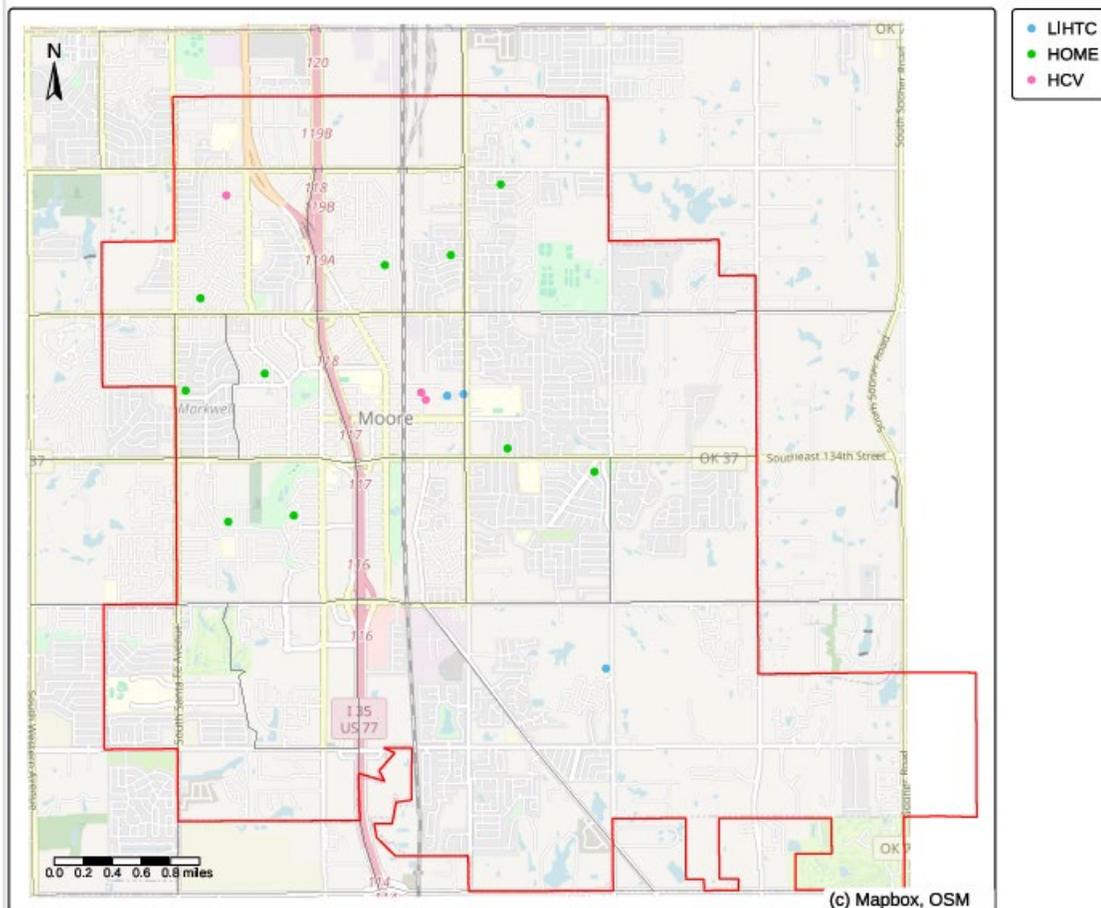
Source: Oklahoma Housing Finance Agency and RKG Associates, Inc., 2025

The locations of publicly assisted housing developments in Moore were then mapped (Figure 3-34), revealing a concentration of these units in the central, northern, and western parts of the city. These areas overlap with neighborhoods with a higher proportion of affordable rental units, a larger share of households with lower median incomes, greater exposure to poverty, and lower homeownership rates, as discussed in the previous sections. This pattern suggests that attainable rental housing options are likely limited to low- to moderate-income neighborhoods, with few choices in other parts of the city, highlighting a barrier to fair housing choice outside of low- and moderate-income neighborhoods.

Therefore, the City should strategically expand and distribute attainable housing options across Moore through encouraging new development and preserving existing affordable housing stock. Doing so would promote more equitable access to housing opportunities throughout the city, aligning with HUD's requirement to affirmatively further fair housing. The HUD guidance specifically discourages clusters of publicly assisted housing units exclusively in low- and moderate-income areas, as this can exacerbate segregation and limit access to opportunity.

Figure 3-34

Publicly Supported Housing Moore City, Oklahoma



R. HOUSING PROBLEMS

According to HUD, a household is identified as having a housing problem if they have any one or more of these four problems:

- Lack of complete kitchen facilities,
- Lack of complete plumbing facilities,
- Household is overcrowded, which means there are more than 1.5 persons per room, excluding bathrooms, porches, foyers, halls, or half-rooms, and
- Household is cost-burdened (paying more than 30 percent of their income for housing).

Analyzing housing problems highlights areas where deferred maintenance has resulted in condition problems and eroded the housing stock. The HUD AFFH data indicates that 6,140 households have one or more housing problems, accounting for 26.5% of the total households in Moore. All non-White racial and ethnic households in Moore experience housing problems at rates higher than the citywide average of 26.5%. This indicates that all non-White racial households are disproportionately impacted by housing problems.

Among the non-White populations, although the Native American households account for a smaller number of households, they have the highest share of households with at least one housing problem. Coupled with the previous finding that Native American households in Moore have the lowest homeownership rate and the slowest population growth over the past decade, the data indicate limited safe and attainable housing options for this group, both rental units and homeownership opportunities.

The Asian/Pacific Islander households are the second most likely (40.4%) to experience at least one housing problem in Moore, followed by the Hispanic (34.2%) and Black households (32.5%). In contrast, while the largest number of households with housing problems are headed by White residents (4,180 households), their rate of housing problems (23.8%) is relatively lower than the citywide average. This highlights a racial and ethnic disparity in housing conditions, with non-White groups facing greater challenges in accessing and maintaining quality, affordable housing (Figure 3-37).

The concentration of households with one or more housing problems also varies geographically. Census Tracts 2016.02, 2016.04, and 2021.02, located primarily in the western/northwestern part of Moore, have the highest share of households experiencing housing problems. Some of these areas also have the highest concentrations of the Hispanic and minority populations. In addition, these tracts generally overlap with areas with a higher level of poverty exposure, lower school proficiency, lower labor market engagement, and a higher proportion of households with lower incomes. The convergence of these factors suggests that housing problems in these areas are closely tied to broader socioeconomic disparities, underscoring the need for the City to expand the options of and access to attainable quality housing and community opportunities in these neighborhoods and throughout Moore (Figure 3-38).

Figure 3-37

Households with One or More Housing Problems

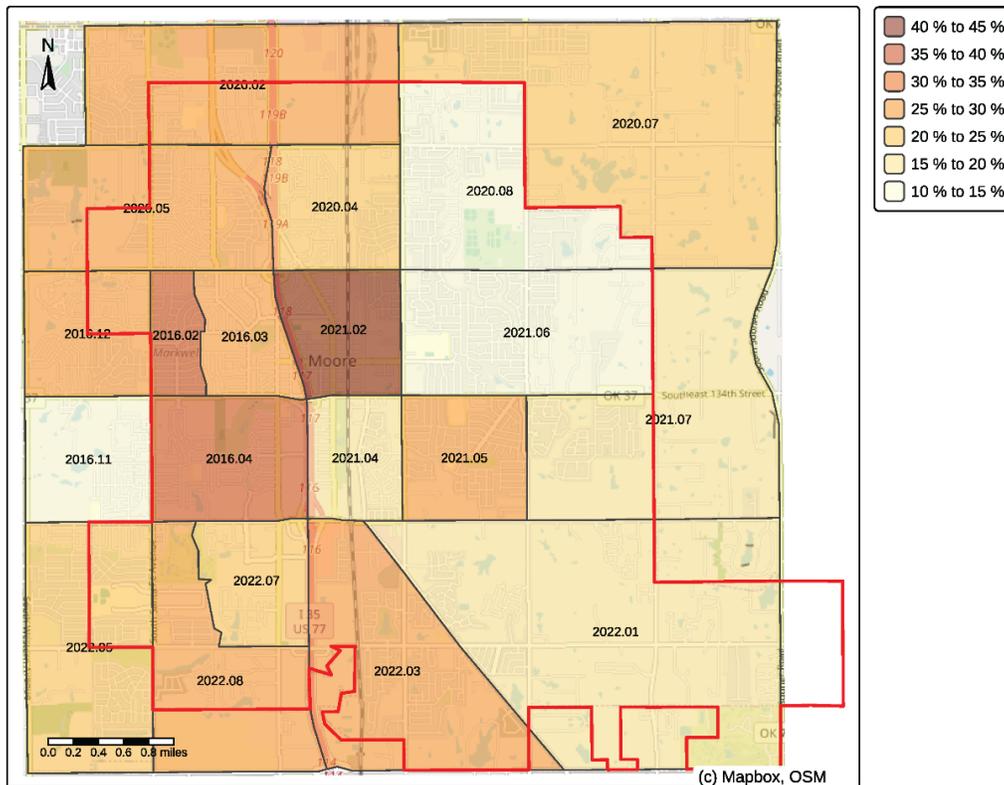
Moore City, Oklahoma (CHAS 2016-2020)

	Households with One or More Housing Problems	
	Count	Percent
Total	6,140	26.5%
White	4,180	23.8%
Black	335	32.5%
Native American	370	41.8%
Asian/Pacific Islander	159	40.4%
Other Race	NA	NA
Hispanic	680	34.2%

Source: HUD AFFH Data Version AFFHT0007, RKG Associates Inc., 2025

Figure 3-38

**Percent of Households with One or More Housing Problems (CHAS 2016-2020)
 Moore City, Oklahoma Census Tracts**



S. COST BURDEN HOUSEHOLD BY INCOME

According to HUD’s CHAS 2017-2021 data, 40.5% of Moore’s renter households are cost-burdened, meaning they pay more than 30% of their annual household income on housing-related costs. In comparison, 16.5% of the city’s owner households are cost-burdened according to HUD’s CHAS 2017-2021 data (Figure 3-39).

Among renter households earning at or below 80% of the Area Median Income (AMI), 69.7% are cost-burdened, spending more than 30% of their household income on housing costs. Among owner households earning at or below 80% of the AMI, 50.8% are cost-burdened. Housing cost burden is most prominent for renter households earning at or below 50% of the AMI and for owner households earning at or below 30% of the AMI.

The data suggests that housing affordability challenges are most severe among lower-income residents, particularly for renters. This is largely due to the limited supply of attainable rental housing options in Moore. These findings underscore the need for the City to increase housing affordability, especially for low-income renters in Moore.

In addition, many of the cost-burdened owner households at the lowest income levels are likely elderly or retirees on fixed incomes, further highlighting the need for targeted housing support. In general, the shortage of housing options attainable for households earning less than 80% of the AMI creates barriers to fair housing choices for the city’s most vulnerable residents.

Figure 3-39
Cost-Burdened Households by Income
Moore City, Oklahoma

% of Area Median Income	Renter Cost-Burden > 30%			Owner Cost-Burden > 30%		
	Count	Total Renters	Percent	Count	Total Owners	Percent
<= 30% AMI	770	1,070	72.0%	755	915	82.5%
31% - 50% AMI	535	650	82.3%	415	950	43.7%
51% - 80% AMI	1,350	2,090	64.6%	1,020	2,445	41.7%
81% - 100% AMI	175	955	18.3%	300	2,485	12.1%
>100% AMI	45	2,335	1.9%	215	9,615	2.2%
Cost-Burdened Households <= 80% AMI	2,655	3,810	69.7%	2,190	4,310	50.8%

Source: CHAS 2017-2021 and RKG Associates, Inc., 2025

T. COMPOSITE INDEX SCORE

To measure and evaluate the combined performance of all racial and ethnic groups in each census tract combining all the previously presented demographic, housing, and fair housing indexes, RKG converted the value of all indicators into index scores that align with the HUD AFFH indexes (e.g., the Low Poverty Index) in scale and range. The indicators that were converted by RKG include:

Converted Indicators

- 2023 median household income,
- 2013-2023 average annual percent change of median household income,
- Percentage of the minority population,
- Percentage of people with disabilities,
- Percentage of owner-occupied housing units,
- Percentage of affordable rental units, and
- Percentage of housing units with one or more housing problems.

HUD AFFH Indexes

- Low Poverty Index,
- School Proficiency Index,
- Job Proximity Index,
- Labor Market Engagement Index, and
- Environmental Health Index.

The consultant identified the highest average index values for all census tracts for each indicator and assigned it the highest index score. Then, all other census tract values were converted to index scores as a percentage of the highest index value. In two instances (percentage of people with disabilities and percentage of housing units with one or more housing problems), the consultant assigned the highest index score to the lowest indicator value to reflect the actual meaning of the indicator. For example, the census tract with the lowest percentage of its population having a disability is considered to face fewer fair housing challenges compared to other census tracts, and this is reflected in the highest index score. As such, the higher the census tract's index score, the better its conditions were relative to the performance indicators.

The census tracts were then ranked based on their total scores, and the results (the lowest total score was ranked as 1, and the highest was ranked as 20) were then mapped in ArcGIS. The darker shading reflects a higher ranking and better fair housing opportunities, while lighter shades indicate that the census tracts face more fair housing challenges. Readers should note that this is not an absolute measurement of the fair housing opportunities across the city's neighborhoods, as the index score conversion is only an approximation aiming to bring all indicators into a comparable scale based on currently available data. Rather, this analysis provides readers with insights into the geographic concentration of fair housing issues across Moore and opportunities to start to identify neighborhoods that need additional resources to increase their fair housing availability.

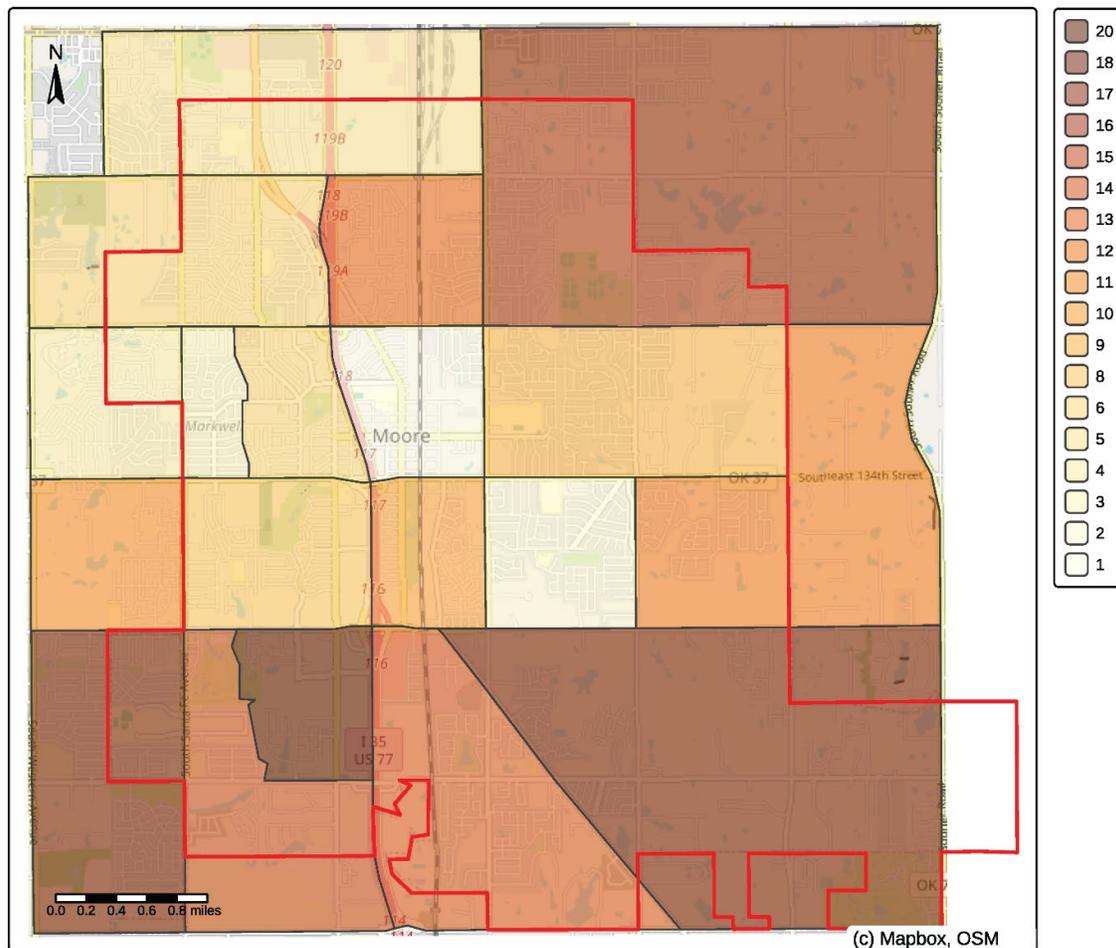
The map indicates that the best conditions exist in census tracts on the south side of the city, which are neighborhoods with higher household incomes. The most challenged census tracts are on the central, western, and northwestern sides of the city, where renters have a larger presence, coupled with a higher

prevalence of housing condition issues, lower household incomes, lower levels of labor market engagement and school proficiency, as well as a cluster of the Hispanic and minority populations (Figure 3-40).

Recommendations

The data indicate that Moore’s low- to moderate-income neighborhoods face disproportionate barriers to fair housing choices in the city. This suggests that the City should expand additional attainable housing options throughout the city and increase fair access to housing and resources for the most vulnerable populations, especially those in the central, western, and northwestern parts of Moore, such as employment, job training, quality education, housing rehabilitation, and homeownership opportunities in existing low- to moderate-income areas.

Figure 3-40
Composite Index Score Ranking for Demographic & Housing Issues
Moore City Census Tracts, Oklahoma



4 RECORDS OF HOUSING DISCRIMINATION

A. INTRODUCTION

This section examined the records of housing discrimination complaints that originated in Moore to analyze the types of existing fair housing issues. The Federal Fair Housing Act (FHA) of 1968, as amended in 1974 and 1988, prohibits housing discrimination based on race, color, religion, national origin, sex, disability, and familial status. Alleged violations of the FHA may be filed with:

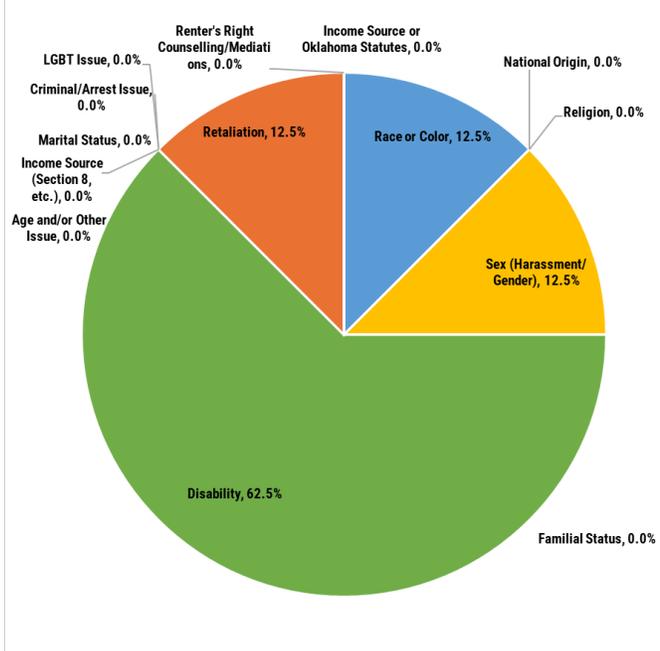
- United States Department of Housing and Urban Development (HUD) Regional Office of Fair Housing and Equal Opportunity (FHEO),
- Metropolitan Fair Housing Council (MFHC) of Oklahoma,
- The Office of Civil Rights Enforcement (OCRE), Attorney General’s Office of Oklahoma, and
- United States Department of Justice (DOJ).

B. U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT (HUD)

The Office of Fair Housing and Equal Opportunity (FHEO) at HUD receives formal complaints regarding alleged violations of the FHA filed by individuals or organizations on behalf of the individuals. The consultants requested the data on fair housing complaints filed in Moore from HUD’s Regional Office in February 2025. A response, along with the data requested, was received in March 2025.

Consultants obtained fair housing discrimination complaint intake data by category/complaint reason between 2021 and 2025 from HUD. HUD totally received 6 complaint intakes from Moore between 2021 and 2025. Among total complaints, 1 complaint fell under three categories simultaneously in the year 2023 and therefore was counted thrice (e.g., Race, Disability, and Retaliation). Note that a complaint can be filed for multiple reasons. The most common reason was discrimination based on “Disability”, accounting for 62.5%. Intakes of “Race or Color”, “Sex”, and “Retaliation” issues were the second most common, constituting 12.5% each (Figure 4-1/Figure 4-2).

Figure 4-1: HUD Fair Housing Complaints, 2021-2025



Source: HUD and RKG Associates, Inc., 2025

Figure 4-2

**United States Department of Housing and Urban Development
 Fair Housing Complaints, 5 Program Years (2021-2025)
 Moore, Oklahoma**

Category	2021	2022	2023	2024	2025	Total	Percent
Race or Color			1			1	12.5%
National Origin						0	0.0%
Religion						0	0.0%
Sex (Harassment/ Gender)		1				1	12.5%
Familial Status						0	0.0%
Disability		1	1	2	1	5	62.5%
Age and/or Other Issue						0	0.0%
Marital Status						0	0.0%
Income Source (Section 8, etc.)						0	0.0%
LGBT Issue						0	0.0%
Criminal/Arrest Issue						0	0.0%
Retaliation			1			1	12.5%
Renter's Right Counselling/Mediations						0	0.0%
Income Source or Oklahoma Statutes						0	0.0%
Total	0	2	3	2	1	8	100.0%

Source: United States Department of Housing and Urban Development, 2025

While HUD complaint intake data provides a useful snapshot of fair housing issues, the low number of complaints reported between 2021 and 2025 (only six from Moore) likely underrepresents the true extent of housing discrimination in the community. One key reason for this underrepresentation is that many residents may choose to report their concerns to regional organizations instead of directly to HUD.

In Oklahoma, the Metropolitan Fair Housing Council (MFHC) plays a central role in fair housing enforcement and education. MFHC is often more visible and accessible to residents due to local outreach. Because of this, individuals experiencing discrimination may be more likely to file complaints with MFHC than with HUD. Therefore, though the total number of cases filed with HUD is small, there could be broader and more widespread patterns of discrimination within the community. This is further supported by the complaint data obtained from the Metropolitan Fair Housing Council (MFHC), presented in the following section.

C. METROPOLITAN FAIR HOUSING COUNCIL (MFHC)

The Metropolitan Fair Housing Council (MFHC) of Oklahoma is a private nonprofit fair housing agency dedicated to eliminating housing discrimination and promoting racially and economically integrated communities. As the previous AI stated, the Metropolitan Fair Housing Council of Oklahoma (MFHC) is the main organization responsible for housing-related communication and outreach in Oklahoma, including the City of Moore, and this remains true at the time of the study. Since 2015, the City of Moore has contracted MFHC to provide fair housing education and outreach.

MFHC's services include:

- Homebuyer education classes (in English and Spanish)
- Counseling and advocacy for people with limited English proficiency
- Fair housing training for the public, professionals, and organizations
- Legal training on fair housing laws for attorneys and agencies

- Publishing and distributing educational materials on fair housing

MHFC has continued to help educate and support the public and professionals on fair housing rights and issues, especially for vulnerable populations, in cities including Moore.

Since 1979, MFHC has provided fair housing services including counseling, complaint investigation and testing, referrals to HUD, education and outreach training, mediation, and legal referrals through its staff attorney or cooperating attorneys. Currently, under a CDBG-funded contract with Moore, MFHC offers fair housing enforcement, education, and outreach within the city's jurisdiction. These services include a free housing legal clinic and emergency housing mediation outreach.

Figure 4-3 summarizes fair housing complaint intakes received by MFHC from Moore over five full program years and the first seven months of the current program year (October 1, 2019 – April 30, 2025). A notable spike in complaint intakes occurred during the period from July 1, 2022, to July 5, 2023, which falls outside the standard program year timeline. Upon inquiry, MFHC clarified that this deviation was due to a special project funded through CDBG-CV. As a result, this specific time frame was tracked separately from the regular program years. Although the months of July, August, and September 2022 overlap with the final quarter of the 2021–2022 program year, MFHC confirmed that complaints from these months were not double-counted.

Figure 4-3

Metropolitan Fair Housing Council of Oklahoma, Inc.

Fair Housing Complaints, 5 Program Years & 7 Months of Current Program Year (10/1/2019 to 4/30/2025)

Moore, Oklahoma

Category	10/1/19 - 9/30/20	10/1/20 - 9/30/21	10/1/21- 9/30/22	7/1/22 - 7/5/23	10/1/23 - 9/30/24	10/1/24 - 4/30/25 (7 Months)	Total	Percent
Race or Color							0	0.0%
National Origin							0	0.0%
Religion							0	0.0%
Sex (Harassment/ Gender)							0	0.0%
Familial Status	3		4	11			18	18.4%
Disability	3	6	7	2	5	4	27	27.6%
Age and/or Other Issue							0	0.0%
Marital Status							0	0.0%
Income Source (Section 8, etc.)							0	0.0%
LGBT Issue							0	0.0%
Criminal/Arrest Issue							0	0.0%
Retaliation							0	0.0%
Renter's Right Counselling/Mediations	8	7	7	14	13	4	53	54.1%
Income Source or Oklahoma Statutes							0	0.0%
Total	14	13	18	27	18	8	98	100.0%

Source: Metropolitan Fair Housing Council of Oklahoma, 2025

Over the course, the Metropolitan Fair Housing Council of Oklahoma recorded a total of 98 complaints from Moore, Oklahoma. The data shows that the majority of complaints fell into two primary categories:

- Renter's Rights Counselling/Mediations: 53 complaints (54.1%), making it the largest category.
- Disability-related complaints: 27 complaints (27.6%), the second largest category.

Familial status complaints accounted for 18 instances (18.4%), and there were no complaints related to other categories, such as race, color, religion, national origin, sex, or income source.

Typical renter's rights complaints deal with the legal rights and responsibilities between landlords and tenants, and there are laws that govern those interactions. Complaints regarding disabilities deal with a different set of issues. For people who have a physical or mental disability (including hearing, mobility, and visual impairments, chronic alcoholism, chronic mental illness, AIDS, AIDS Related Complex and mental disabilities) that substantially limits one or more major life activities, landlords may not refuse to let a tenant make reasonable modifications to the dwelling or common use areas, at the tenant's expense so the disabled person can use the housing. Where reasonable, the landlord may permit changes only if the tenant agrees to restore the property to its original condition when their period of tenancy has ended. Landlords cannot refuse to make reasonable accommodations in rules, policies, practices, or services, if necessary, for the disabled person to use the housing.

In addition, it should be noted that the U.S. Department of Justice Civil Rights Division also considers the following as a violation of the Fair Housing Act regarding protections for persons with disabilities:

- Municipalities and other local government entities make zoning or land use decisions or implement land use policies that exclude or otherwise discriminate against individuals with disabilities through discrimination in housing based upon disability group homes.
- Failure "to design and construct" certain new multi-family dwellings so that they are accessible to and usable by persons with disabilities, and particularly people who use wheelchairs.¹

Regarding family status-related complaints, unless a building or community qualifies as housing for older persons, it may not discriminate based on familial status. That is, it may not discriminate against families in which one or more children under 18 live with: (1) a parent, (2) a person who has legal custody of the child or children, or (3) the designee of the parent or legal custodian, with the parent or custodian's written permission. Familial status protection also applies to pregnant women and anyone securing legal custody of a child under 18.²

The data suggests that households with children, pregnant people, people securing legal custody of a child, people with disabilities, and renters are more vulnerable and more likely to face housing discrimination and barriers to fair housing access in Moore. Therefore, the City should continue its partnership with MFHC and place an additional focus on these groups in Moore's local housing policies to ensure their access to fair housing options in the city.

D. OFFICE OF THE STATE ATTORNEY GENERAL

The Office of Civil Rights Enforcement (OCRE) is a division of the Attorney General's Office of Oklahoma and is responsible for enforcing the Anti-Discrimination Act, which prohibits discrimination in employment, housing, and public accommodation, as well as enforcing other civil rights-related laws. The OCRE took over investigating fair housing complaints from the Oklahoma Human Rights Commission in July 2012. OCRE provided the data on complaint intakes in July 2025.

According to OCRE, four housing discrimination complaints have been filed in Moore since 2020, with one in 2021, two in 2023, and one in 2024. Most of these complaints involved issues related to disability and retaliation. Of the four cases, two were resolved during OCRE's investigation, one proceeded to litigation (with the complainant ultimately losing in court), and one was closed due to insufficient

¹ Department of Justice website: <https://www.justice.gov/crt/fair-housing-act-1>

² LegalAidOK website: <https://oklaw.org/resource/fair-housing-its-your-right-1>

evidence. OCRE also noted that they do not have a dual filing agreement with HUD and are not aware of the trends in complaints that may have been filed with other fair housing agencies. Additionally, OCRE reported an overall increase in housing discrimination complaints statewide since 2020.

E. UNITED STATES DEPARTMENT OF JUSTICE

RKG requested housing discrimination complaint records from the Civil Rights Division of the U.S. Department of Justice (DOJ) in June 2025 in the form of a Freedom of Information Act (FOIA) request. RKG has not received the data from the DOJ at the time this report was written.

5 REVIEW OF PUBLIC SECTOR POLICIES

A. INTRODUCTION

Public policies set the direction for a city's socioeconomic trends, development prospects, and priorities. They influence numerous facets of residents' lives and establish principles to distribute resources. Policies, practices, or procedures that appear neutral when taken at face value may actually deny or adversely affect the provision of housing to persons of a particular race, color, religion, sex, disability, familial status, or national origin and create impediments to fair housing choice.

An element of the Analysis of Impediments to Fair Housing Choice includes an examination of a city's policies in terms of their impact on housing choice. This section evaluates Moore's policies to determine opportunities for accelerating the expansion of fair housing choice.

B. POLICIES GOVERNING INVESTMENT OF FUNDS FOR HOUSING AND COMMUNITY DEVELOPMENT

An examination of the City's current budget is essential for understanding how the financial resources in support of fair housing choices have increased or declined over the past few years. Moore receives federal entitlement funds directly and indirectly from HUD in the form of:

Community Development Block Grants (CDBG)

The primary objective of this program is to develop viable urban communities by providing decent housing, a suitable living environment, and economic opportunities, principally for persons of low- and moderate-income levels. Funds can be used for a wide array of activities, including housing rehabilitation, homeownership assistance, lead-based paint remediation, construction or rehabilitation of public facilities and infrastructure, removal of architectural barriers, public services, rehabilitation of commercial or industrial buildings, and loans or grants to businesses.

Project Funding Criteria

Between 2020 and 2024, Moore's annual CDBG allocation remained relatively stable, averaging around \$344,000. The highest allocation occurred in 2021 at \$349,568, but there has been a slight decline since then, with the amount down to \$345,997 in 2024. While the difference in dollar amounts is modest, the impact is more significant when considering inflation and rising project costs. This trend highlights the need for the City to seek supplemental funding sources to support community services at current levels and expand access to fair housing options.

The City of Moore's CDBG funding priorities between 2020 and 2024 remain largely consistent with the trends identified in the 2020 Analysis of Impediments to Fair Housing Choice. A large portion of annual allocations, approximately 60% to 65%, continues to support municipal infrastructure projects, particularly sewer line replacements. While these projects are eligible under HUD guidelines when located

in low- and moderate-income areas, they do not directly address the affordable housing needs outlined in the 2020 AI. Minimal funding has been directed toward affordable housing development, rehabilitation, or support for Community Housing Development Organizations (CHDOs). This suggests that the City's CDBG investment strategy has not significantly changed since the prior AI, and the need to expand funding priorities to include affordable housing remains relevant.

Note that the City of Moore does not receive HOME Investment Partnerships Program (HOME) funds, which are HUD's primary source of federal funding specifically for the creation and preservation of affordable housing. Unlike CDBG, which supports a broader range of community development activities, the HOME Investment Partnerships Program offers grants to states and local governments to develop affordable housing for low-income families. These funds can be used for various activities, including constructing, purchasing, or renovating affordable housing for rent or ownership, as well as providing direct rental assistance to low-income individuals. The program emphasizes flexibility, allowing communities to customize strategies to meet their particular needs and priorities.

Without access to HOME funds, Moore faces limitations in addressing local affordable housing needs, particularly in developing new housing units, providing tenant-based rental assistance, or offering substantial housing rehabilitation programs. This gap further highlights the importance of expanding local funding sources to support housing development and preservation, in addition to strategically using CDBG funds to support fair housing goals where possible. Additionally, the shortage of local nonprofit housing developers (aside from Habitat for Humanity) adds to the challenge, underscoring the need for the City to explore partnerships, regional collaborations, or alternative funding mechanisms to expand its attainable housing development and preservation capacity.

C. PUBLIC HOUSING AND SECTION 8 VOUCHER PROGRAMS

Moore does not have a housing authority, and the city has no public housing projects. The Oklahoma Housing Finance Agency (OHFA) administers the Section 8 Housing Choice Voucher program in Moore, providing rental assistance to low-income residents. In addition to this, OHFA supports affordable housing across the state through programs such as the Low-Income Housing Tax Credit (LIHTC), homebuyer assistance initiatives, and funding for housing targeted to special populations, including seniors, veterans, and people with disabilities.

According to the latest data, Moore has a total of 593 publicly assisted housing units across major programs like Housing Choice Voucher, Section 202, Loan Management Set-Aside (LMSA) program, Low-Income Housing Tax Credit (LIHTC), and HOME-funded projects (Figure 5-1).

- 213 properties are supported by the Section 202/ Loan Management Set-Aside (LMSA) program. While these are distinct from the HCV program, they provide project-based rental assistance under Section 8 authority and are often grouped under the broader "Section 8" category in the National Housing Preservation Database (NHPD). The largest property is Nottingham Square, is supported by Section 202 (162 units for families) and has the earliest subsidy expiration in 2029.
- The LIHTC program funded 370 units, serving families, the elderly, and disabled individuals. Key developments include Lyons Estates (92 units for families) and Forest Village Estate (34 units for elderly or disabled tenants and The Curve (244 Units). The earliest expiration year among all LIHTC projects is 2035.

The Curve is a 244-unit multifamily project located at SW 17th Street and Janeway Avenue. It includes 220 tax credit units and 24 market-rate units, with unit sizes ranging from efficiency to three bedrooms. Amenities include a pool, game room, community room, board room, and in-unit washers and dryers. The development was built on the site of a former mobile home park destroyed by the 2013 EF5 tornado, which caused extensive damage in Moore. The City contributed approximately \$16 million in Community Development Block Grant–Disaster Recovery (CDBG-DR) funds received from HUD to support the project, representing a significant investment in long-term affordable housing and community rebuilding efforts.

- HOME-funded projects are smaller in scale, totaling 10 scattered-site units across individual properties. These units have their affordability expiring between 2035 and 2041. Note that the projects funded by HOME at 1112 NE 25th St and 729 NE 18th St are administered by OHFA. Both of these properties also have tenants who participate in the Housing Choice Voucher (HCV)/ Section 202/ LMSA program.

Overall, most of Moore’s publicly supported housing units serve the elderly population and families. The earliest expiration of affordability restrictions is in 2029, indicating an immediate need for the City to prioritize preserving existing affordability at risk of expiring.

Figure 5-1
Active Publicly Assisted Housing Projects
Moore, Oklahoma

	Target Tenant Type	Total Units	Earliest Expiration Year
Section 8/Section 202/LMSA		213	
Nottingham Square	Family	162	2029
Langley Village Apartments	Elderly	51	2036
Low Income Housing Tax Credit Projects (LIHTC)		370	
Forest Village Estate	Elderly or disabled	34	2036
Lyons Estates	Family	92	2035
The Curve	Family	244	2040
HOME Funded Projects		10	
Moore Rental Phase II Location2	NA	1	2036
Moore Rental Phase II Regency	NA	1	2035
Moore Rental Phase I Cottonwood	NA	1	2035
Moore Rental Phase II	NA	1	2036
1044 NW 6th St	NA	1	2037
1112 NE 25th St	NA	1	2041
401 S Avery St	NA	1	2041
510 NE 18th St	NA	1	2037
624 N Dillon Ave	NA	1	2037
729 NE 18th St	NA	1	2041
Total		593	

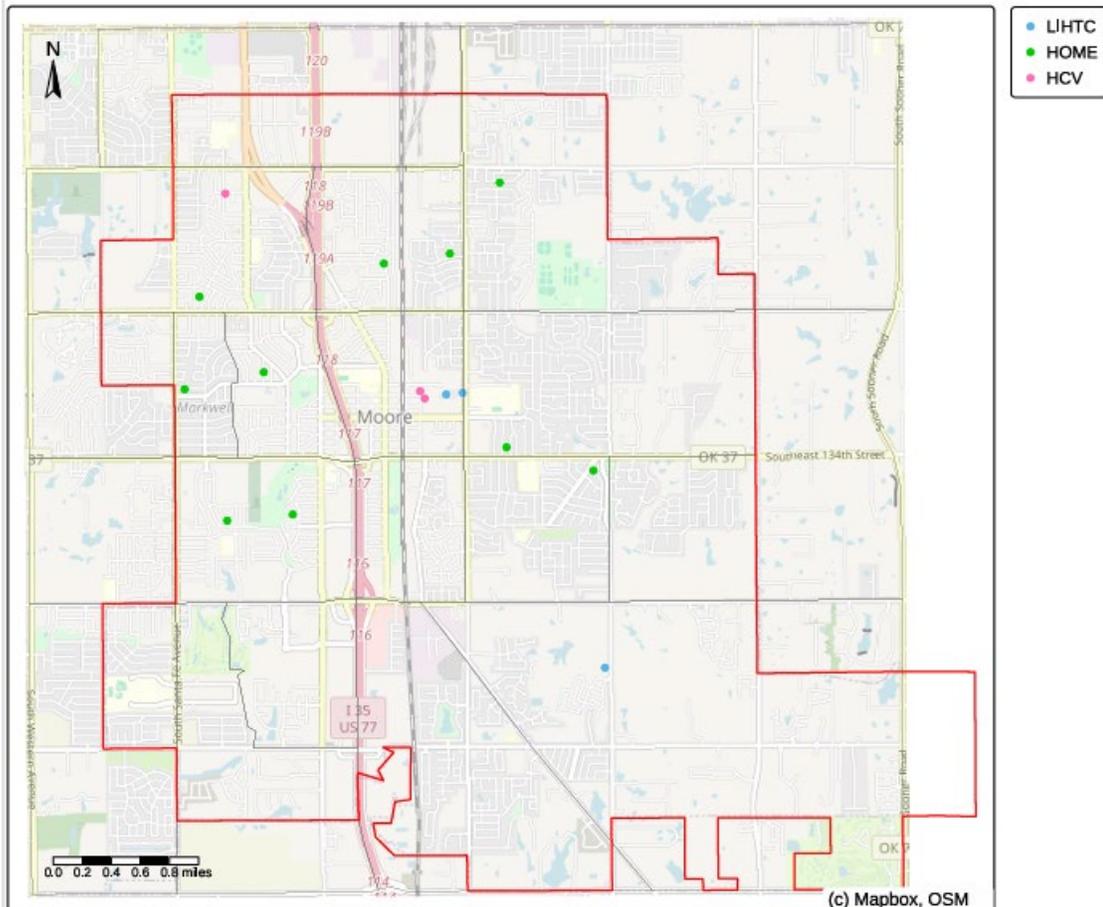
Source: National Housing Preservation Database, and RKG Associates, Inc., 2025

As discussed in Section 3, publicly supported housing developments cluster in the central, western, and northwestern parts of the city, overlapping with neighborhoods with a higher proportion of affordable rental units, a larger share of households with lower incomes, greater exposure to poverty, and notably lower homeownership rates (Figure 5-2).

These patterns suggest that attainable rental housing options are primarily limited to low- to moderate-income neighborhoods. In effect, this can result in a concentration of poverty and a lack of equitable access to affordable housing opportunities in other parts of Moore. This geographic clustering of publicly supported housing highlights impediments to fair housing choice for lower-income residents across the city.

Figure 5-2

**Publicly Supported Housing
Moore City, Oklahoma**



Consultants analyzed data on households in Moore participating in the Section 8 Housing Choice Voucher (HCV) program, which currently supports 387 unique households. The data reveals notable racial and ethnic diversity among participants, with many households identifying with more than one racial or ethnic group. As a result, the total counts by race/ethnicity exceed the number of unique households. The largest represented group includes Black or African American households (222), followed by White households (185). Smaller numbers of households include members identifying as American Indian or Alaska Native (26), Asian (2), Native Hawaiian or Other Pacific Islander (1), and Hispanic/Latino (37).

The data also provides insights into household composition and housing needs. Most HCV households live in two-bedroom units (36.4%). Larger units (four bedrooms or more) make up 13% of the total. Over half of the households (54.8%) include individuals with disabilities, and 54 households are classified as elderly. Family households (247) make up a significant majority compared to single-person households (140). These trends suggest that families and people with disabilities are among the most vulnerable populations in Moore, likely facing the greatest challenges in finding accessible, affordable housing outside the Section 8 program.

The consultants also obtained data on the active households on the Housing Choice Voucher program waitlist. The unmet demand (those currently on the waitlist) is over 100 households (Figure 5-4). It is important to note that some households include household members from multiple racial or ethnic backgrounds. As a result, a single household may be counted multiple times under the "Race/Ethnicity"

Figure 5-3
HCV Participant Composition
Moore, Oklahoma

	Count	Percent
Total Active Participating Households	387	100.0%
Persons by Race/Ethnicity		
White Members	185	NA
Black/African American Members	222	NA
American Indian/Alaska Native Members	26	NA
Asian Members	2	NA
Native Hawaiian/ Oth Pacific Islander Members	1	NA
Other Members	0	NA
Hispanic/Latino Members	37	NA
Households by Rent		
Rent \$0 to \$100	114	29.5%
Rent \$101 to \$200	58	15.0%
Rent \$201 to \$300	92	23.8%
Rent \$301 to \$400	37	9.6%
Rent \$401 and above	86	22.2%
Households by Bedroom Type		
Studio	3	0.8%
1 Bedroom	100	25.8%
2 Bedrooms	141	36.4%
3 Bedrooms	90	23.3%
4 Bedrooms	42	10.9%
5 Bedrooms	8	2.1%
6 Bedrooms	1	0.3%
Households by Type		
Singles	140	36.2%
Families	247	63.8%
Households by Disability and Elderly Status		
Disabled	212	54.8%
Elderly (62+)	54	14.0%

Source: Oklahoma Housing Finance Agency and RKG Associates, Inc., 2025

category. Therefore, the sum of the figures under this category exceeds the overall unique household counts(110). Consequently, percentages for the "Race/Ethnicity" category are not calculated. The following provides a count of households by household members' racial/ethnic groups:

- 57 households have White members
- 53 households have Black or African American members
- 15 households have American Indian or Alaska Native members
- 5 households have an Asian member
- 1 household has Native Hawaiian or Other Pacific Islander members
- 14 households have Hispanic/ Latino members

This highlights the racial and ethnic diversity among households on the waitlist. Note that more households with White members are active applicants on the waitlist, followed by households with

Black/African American members. Of the total applicants on the waitlist, 23 households have individuals with disabilities, and 11 households have the elderly (age 62 and older). In addition, the majority of households on the waitlist are families (65.8%), and the rest comprise single-person households (34.2%).

This data reflects that a large portion of applicants on the waitlist are families, suggesting continued pressure on the availability of larger, family-sized affordable rental units. Other than White applicants, more households with Black/African American and American Indian/Alaska Native members are on the waitlist, suggesting potential disparities in access to attainable rental housing or a higher level of housing need within these communities. This means that proportionally, family households and households with Black household members are likely the most vulnerable populations facing the greatest barriers to fair housing choices in Moore.

The Oklahoma Housing Finance Agency prioritizes disabled and homeless households on the waitlist, typically scheduling appointments for these applicants within 2 to 3 months. For all other applicants, the estimated wait time ranges from 2 to 5 years.

Figure 5-4

**HCV Active Applicants on Waitlist
 Moore, Oklahoma**

	Count	Percent
Total HCV Waitlist Applicants (Households)	111	100.0%
Persons by Race/Ethnicity		
White	57	NA
Black/African American	53	NA
American Indian/Alaska Native	15	NA
Asian	5	NA
Native Hawaiian/ Oth Pacific Islander	1	NA
Other	0	NA
Hispanic/Latino	13	NA
Households by Family Size		
Singles	38	34.2%
Families	73	65.8%
Households by Disability and Elderly Status		
Disabled	23	20.7%
Elderly (62+)	11	9.9%

Source: Oklahoma Housing Finance Agency and RKG Associates, Inc., 2025

D. PRIVATE HOUSING PROGRAMS

The City of Moore currently funds one housing program:

Home Repair Program: Funded with \$60,000 from the City's General Fund, the Home Repair Program provides up to \$5,000 in forgivable loans for exterior home repairs to help bring owner-occupied homes into compliance with property maintenance standards. Eligible repairs include HVAC systems, windows, doors, and roofing.

To qualify, applicants must meet the following criteria:

- Household income must be at or below 80% of the Area Median Income (AMI)
- The property must be located within Moore city limits
- The home must be owner-occupied for at least one year

The City has proposed allocating an additional \$60,000 in general funds to continue the program in the upcoming fiscal year. Final budget approval is expected in June 2025.

Other Housing-Related Programs Funded by The City

In addition, the City allocates funds to several partner organizations that provide housing-related assistance, including repair services and other support programs, including:

Rental Assistance Program by Central Oklahoma Community Action Agency: The City of Moore allocates funds from CDBG to the Central Oklahoma Community Action Agency for rental assistance. As of now, the agency has received \$5,000 for the 2024 grant year, and the cap for assistance is \$1,000 per household.

Catholic Charities of the Archdiocese of Oklahoma City, Inc.: The City allocates a part of CDBG to the Catholic Charities of the Archdiocese of Oklahoma City to provide an Emergency Rent and Utility Assistance program for clients in need of assistance with rent or a utility bill. To qualify for the program, the client must have a sustainable monthly income or possess any type of housing voucher.

Metropolitan Fair Housing Council of Oklahoma, Inc.: The City partners with the Metropolitan Fair Housing Council (MFHC), a 501(c)(3) nonprofit organization, to support fair housing education, enforcement, and advocacy. MFHC provides counseling for Moore residents facing eviction or housing discrimination, offers mediation services for willing landlords, and connects individuals to housing resources. If mediation fails, legal assistance may be available through MFHC's Emergency Eviction Intervention Program.

St. Vincent de Paul: St. Vincent de Paul provides utility assistance to Moore residents, covering expenses for Oklahoma Natural Gas (ONG), Oklahoma Gas & Electric (OG&E), and City of Moore water services. The organization also offers rental assistance for individuals transitioning out of rehabilitation facilities, specifically supporting placement in one of the four Oxford Houses located in Moore.

In addition to housing-related programs, the City also partners with organizations such as Aging Services, Inc., the Virtue Center, and Moore First United Methodist Church to provide social services that helps support access to housing and opportunities, such as meal support for seniors (at least 60 years of age), outpatient substance abuse treatment, and food box provisions for households in need.

E. LAND USE AND COMPREHENSIVE PLANNING

Adopted on May 15th, 2017, the Envision Moore Plan 2040 is designed to serve as an update to the Moore Vision 20/20 Plan, which was completed in 2006. There has been no major update to the Envision Moore Plan 2040 since then.

The Envision Moore Plan 2040 recognizes that affordable housing remains one of Moore's existing concerns and acknowledges that one of its goals is to "promote a variety of quality, affordable housing options".

- This includes accommodating a mix of housing types in the future land use plan (patio/ cottage homes and multi-family housing types) in appropriate areas through the future land use plan.
- Allow for Accessory Dwelling Units (ADUs) if properties meet the criteria.
- Another strategy is to identify the barriers to affordable housing and support the incorporation of affordable units in new developments.
- Collaborate with agencies and organizations to help meet the housing needs of neighborhoods.
- Promote large-scale multi-family developments (over 20 units per acre) through Planned Unit Development (PUD) zoning.

The Envision Moore Plan 2040 also has an "Implementation Plan" section, listing out recommendations to help advance its housing goals:

- The Envision Moore Plan 2040 recommends amending the official zoning map.
- To rezone Old Town to promote a mix of uses.
- Permit the development of pocket neighborhoods and senior-friendly housing near parks, retail, and other amenities.
- Modify zoning regulations to allow Accessory Dwelling Units (ADUs) in certain areas under specific conditions.
- Identify and address obstacles that limit the availability of affordable housing.

The Envision Moore Plan 2040 also includes "Future Land Use Description", which outlines:

- Revitalizing Old Town as a multi-faceted place that has a mix of uses and various community activities.
- Promote mixed-use development, where housing and commercial uses are close together.

In the current residential zoning, most of the area is for traditional low-density single-family homes or two-family homes. The Envision Moore Plan 2040 intends to create residential neighborhoods called "Urban Residential" that include a mix of residential types and higher densities. They are:

- Single-Family Detached Units: A maximum density of 7 dwelling units per acre.
- Attached Units (up to 20%): Up to 20% of the residential area can have higher-density housing, such as duplexes, townhomes, and multi-family dwellings with a maximum of 15 dwelling units per acre.

These density increases are context-sensitive, meaning they are strategically located near commercial centers, transit corridors, and other infrastructure to reduce vehicle congestion.

Recommendations

The Envision Moore Plan 2040 recognizes that affordable housing remains one of Moore's existing concerns and outlines its importance. The Plan also lists strategies to execute the goals. However, there have been no publicly announced updates or revisions to the zoning ordinance since the adoption of the Envision Moore Plan 2040 to reflect the listed goals and recommendations, which the City should pursue. Additionally, the City should consider updating the Envision Moore Plan 2040 to reflect any changes or progress made recently since its adoption in 2017.

F. ZONING

Moore's existing zoning ordinance was last updated in 2000, with no new updates since then. The City is currently soliciting bids to carry out a zoning update.

Moore currently has 17 distinct zoning districts. The four residential zones include:

- Single-Family Dwelling (R-1) District: Lowest density, primarily for detached homes like single-family dwellings and residential estates.
- Two-Family Dwelling (R-2) District: A residential district serving a slightly higher population density than R1, primarily for single-family and two-family dwellings.
- General Residential District (R-3): Low gross density district with several dwelling types ranging from single-family to low-rise multi-family dwellings, and including garden apartments, condominiums, and townhouses.
- Multiple Family District (R-4): Maximum density of 15 dwelling units per acre. Other uses permitted are for single-family dwellings, townhouses, low-rise multi-family dwellings, and garden apartments.

Additionally, there is a Planned Unit Development (PUD) zone designed to enhance flexibility and innovation in residential development. This zone encourages site planning that creates a desirable mix of compatible land uses while prioritizing sustainability and integrating pedestrian and traffic systems within the city.

The districts that allow multi-family and residential dwellings with more than two units (R-3 and R-4) are found in the western and southwestern parts of the city, along the I-35, in addition to areas east of Central Park and I-35. Clusters of PUDs can also be found in these areas.

While the Envision Moore Plan 2040 emphasizes the importance of increasing residential density and offering diverse housing options, the City's current zoning framework limits this potential. Most of Moore remains zoned for low-density residential use (R-1 and R-2), with higher-density zones such as R-3 and R-4 being geographically limited to specific areas. The current zoning ordinance does not include a dedicated district for mixed-use development, and multi-family residential density is capped at 15 units per acre, with no zoning category permitting densities above that limit. As a result, the City primarily uses Planned Unit Developments (PUDs) as a flexible tool to allow higher densities and enable a broader mix of housing types, including mixed-use projects, in alignment with the goals of the Envision Moore Plan. However, areas allowing PUDs are also limited, as discussed above.

Recommendations

Updating the Zoning Ordinance

As mentioned above, the City last updated its zoning ordinance in 2000. Most of the city remains zoned for low-density residential uses (R-1 and R-2), with higher-density districts (R-3 and R-4) and PUDs geographically limited and capped at 15 units per acre for multi-family developments. It is a positive step that the City is currently soliciting bids for a zoning update. To align with long-term planning goals listed in the Envision Moore Plan 2040, the City should also ensure that the zoning update is comprehensive, to increase higher-density options, establish a mixed-use district, and expand diverse housing options throughout the city.

Expanding R-3 and R-4 Districts

As mentioned, higher-density districts such as R-3 and R-4 are limited to the western and southwestern parts of the city, along the I-35, in addition to areas east of Central Park and I-35. The City should allow additional "missing middle housing" (which are usually townhouses, triplexes, and smaller multi-family buildings under six units) and multi-family uses by expanding the R-3 and R-4 districts, especially in high-opportunity and amenity-rich areas with easy access to resources.

Upzoning R-4 District

In Moore, the maximum density allowed in Multiple Family District (R-4) is only 15 dwellings per acre. As a rule of thumb, a minimum of 24 units per acre is typically needed to make multi-family developments financially viable, which helps increase the supply of attainable housing units. Traditional suburban multi-family developments typically have at least 48 units per acre. The City should increase the maximum density allowed in the R-4 district to at least 24 units per acre to fully tap into the potential of multi-family developments.

Expanding PUDs and Creating Mixed-Use District

As mentioned previously, Moore does not currently have a dedicated zoning district for mixed-use developments. Instead, the City utilizes the Planned Unit Developments (PUDs) to facilitate mixed-use projects and to build large multi-family (over 20 units) properties. As discussed above, since PUDs are limited in certain areas in the city, Moore should expand its PUDs in existing amenity-rich neighborhoods in addition to using PUDs as a tool to bring in additional resources to areas with limited access to opportunities. The City can also consider creating a dedicated zoning district for this purpose.

G. TAXES AND HOUSING AFFORDABILITY

1. Property Tax

According to the 2025 data from Tax-Rates.org, Oklahoma has one of the lowest median property tax rates in the United States, with only six states collecting a lower median property tax rate than Oklahoma. Within Oklahoma, Tulsa County collects the highest property tax, an average of \$1,344 per year. Cleveland County, where Moore is located, has the second-highest property tax, averaging \$1,281 per year. Oklahoma County and McClain County, which are the neighboring counties of Cleveland County, have property taxes levied at \$1,132 and \$762 on average per year. Compared to other U.S. counties, Cleveland County ranks 1,498th out of 3,143 in terms of property taxes as a share of household income, showing that property taxes in the area are relatively modest.

Although on a national level, Oklahoma levies lower property taxes compared to other states, Cleveland County experiences a higher property tax compared to other counties in the state, second only to Tulsa County. While property taxes are determined and collected by the County rather than the City, the City of Moore can consider exploring local measures to provide some level of property tax relief for its residents, especially the most vulnerable and lower-income homeowners.

2. Tax Incentives and Tax Abatement Program

While Moore does not currently provide local property tax assistance, Oklahoma provides several state-level property tax abatements that benefit Moore's seniors, disabled veterans, and low-income homeowners.

- **Homestead Exemption:** Provides a \$1,000 reduction in the assessed value of a primary residence for all eligible Oklahoma homeowners, with no income restrictions.
- **Additional Homestead Exemption:** Offers an extra \$1,000 exemption for households earning \$20,000 or less.
- **Senior Valuation Freeze:** Homeowners aged 65 or older with an income below \$73,200 (as of 2025) can apply to freeze the taxable value of their home, protecting against future property tax increases.
- **100% Disabled Veteran Exemption:** Grants a full property tax exemption to veterans who are 100% disabled and their surviving spouses, as certified by the Oklahoma Department of Veterans Affairs.

The Oklahoma Housing Finance Agency (OHFA) also offers a range of programs for homebuyers and housing developers, such as down payment assistance, reduced interest rates, and specialized financing options to help make homeownership more accessible, in addition to encouraging the development of affordable housing options:

- **OHFA Dream Down Payment Assistance Program:** Helps eligible homebuyers by providing up to 3.5% of the home's purchase price to cover down payment and closing costs, reducing the financial barrier to homeownership.
- **Mortgage Credit Certificate (MCC) Program:** Allows qualifying homebuyers to claim a federal tax credit based on a portion of the mortgage interest paid each year, helping to lower overall tax liability and make monthly payments more manageable.
- **Financing Options with Reduced Interest Rates:** OHFA also partners with approved lenders to offer special financing options that include reduced interest rates, helping to lower monthly mortgage payments for qualifying homebuyers.
- **Affordable Housing Tax Credit Program:** Supports the development and rehabilitation of affordable rental housing. The program offers 9% tax credits to developers to create or preserve quality rental units for low- to moderate-income households.

Recommendations

A key issue is that, according to City staff, the City does not actively promote or inform residents about these state-level tax relief and homebuyer assistance programs. Also, the City of Moore's website does not include information on programs, offered by the Oklahoma Housing Finance Agency (OHFA) The City should make it one of its priority action items to raise public awareness and effective utilization of these assistance programs available, such as listing these resources on the City's website and including links

to relevant external sources in multiple languages. The City should also establish and maintain relationships with the state's property tax assistance program and the Oklahoma Housing Finance Agency, and refer residents with questions to these contacts for further support.

H. STUDENT HOUSING

Student housing has a generally limited presence in Moore. Randall University, located in Moore, offers on-campus housing primarily for first-year students and upperclassmen. The University of Oklahoma (OU) in Norman provides a wider range of housing options outside of Moore, such as Kraettli Apartments, Cross Village, and Traditions Square. The City should maintain a collaborative relationship with local universities and closely monitor changes in student housing demand and their impact on the local housing market.

I. COMMUNICATION AND OUTREACH

The City of Moore engaged residents in the planning process for the 2025–2029 Consolidated Plan through public meetings and a Community Needs Survey, gathering input on priority needs from both the general and low-income populations. The City also continues its partnership with the Metropolitan Fair Housing Council (MFHC) to provide fair housing education, outreach, and support services, ensuring residents, especially those most vulnerable, are informed and protected under fair housing laws.

1. Community Needs Survey

The City of Moore's Citizen Participation Plan is a formal process approved by the CDBG Advisory Committee and City Council to ensure that residents are actively involved in shaping the city's Action Plan for using federal Community Development Block Grant (CDBG) funds. The City utilized public meetings and a survey (Community Needs Survey) to involve citizens in the process.

As part of the development of the 2025–2029 Consolidated Plan, the City conducted a Community Needs Survey through its website from March 3 to April 4, 2025. Two public meetings to gather input on community needs were held on March 18 and May 15, 2025. A public meeting to receive comments on the draft plan is scheduled for June 26, 2025, followed by a public hearing to adopt the final plan on July 21, 2025.

A total of 318 responses were collected. The survey was about what residents would like to see in their community and what needs within the community are most prominent. The survey responses were categorized into two groups: overall (all respondents) and low-income (responses from low-income individuals). For Moore's overall respondents, the highest priority needs identified were:

- Improvements to nonprofit facilities, including senior and youth centers that offer community services.
- Development of youth centers.
- Facilities for abused, abandoned, and neglected children.
- Street improvements.
- Neighborhood cleanups.
- Storefront improvements in low-income neighborhoods.
- Code enforcement in low-income areas.
- Homeownership assistance.

For Moore's low-income respondents, the following needs were identified as the highest priorities:

- Improvements to non-profit facilities providing community services.
- Access to mental health facilities.
- Street improvements and upgrades to infrastructure (streets, drainage, sidewalks, and utilities).
- Crime awareness/prevention.
- Mental health services.
- Code Enforcement activities in low-income neighborhoods.

Both overall and low-income respondents in Moore identified several overlapping priorities, particularly the need for improvements to nonprofit facilities, street and infrastructure upgrades, and code enforcement in low-income neighborhoods. These shared concerns reflect a community-wide focus on basic infrastructure and support services.

2. Fair Housing Outreach by MHFC

The Metropolitan Fair Housing Council (MFHC) of Oklahoma is a private nonprofit fair housing agency dedicated to eliminating housing discrimination and promoting racially and economically integrated communities. As discussed in the previous AI, the Metropolitan Fair Housing Council of Oklahoma (MFHC) is the main organization responsible for housing-related communication and outreach in Oklahoma, including the City of Moore. Since 2015, the City of Moore has contracted MFHC to provide fair housing education and outreach. MFHC's services include:

- Homebuyer education classes (in English and Spanish),
- Counseling and advocacy for people with limited English proficiency,
- Fair housing training for the public, professionals, and organizations,
- Legal training on fair housing laws for attorneys and agencies, and
- Publishing and distributing educational materials on fair housing.

MHFC continues to help educate and support the public and professionals on fair housing rights and issues, especially for low-income and minority populations. However, the increasing unpredictability of federal funding, such as CDBG, may hinder MFHC's future activities.

J. PUBLIC TRANSPORTATION

As previously identified in both the 2015 and 2020 Analysis of Impediments to Fair Housing Choice, Moore still does not have a citywide public transit system. This continues to create challenges for many residents, especially those with lower incomes, disabilities, or without reliable transportation options, to access housing, healthcare, employment, and other essential services. While citywide public transportation services remain unavailable, a few transportation programs are present in Moore, though limited to certain age groups, disability statuses, or areas:

- **The Moore Council on Aging and Brand Senior Center** offer scheduled rides within Moore for seniors aged 55 and older to the senior center, appointments, and shopping.
- **EMBARK and Area-wide Aging Agency** offer scheduled transportation for seniors aged 60 and older.
- **SoonerRide** provides non-emergency medical rides for SoonerCare recipients with trips scheduled three days in advance.
- **EMBARK Share-A-Fare** offers \$4 trip subsidies for door-to-door trips in Moore and four other cities to seniors and people aged up to 52 with disabilities.
- **EMBARK Fixed Routes 13N & 040** serve the general public near northwest Moore, with three stops within Moore's city limits.
- **EMBARK Route 144** runs twice a day on Tuesdays and Fridays between Norman and the Social Security office in Moore for the general public.

In 2019, the Regional Transit Authority of Central Oklahoma (RTA) was formed as a joint initiative between Oklahoma City, Edmond, Del City, Midwest City, and Norman to develop a comprehensive, interconnected transit system for the Central Oklahoma metropolitan area. Although two transit stops in Moore were initially planned as part of the system, the City of Moore later chose to withdraw from the RTA in 2022, citing concerns related to funding and resource allocation.

Following the withdrawal, Moore initiated its public transportation feasibility study in 2024 to explore alternative transit options tailored to the city's needs. The primary objectives of the study were to determine the feasibility of public transportation in Moore and, if feasible, develop recommendations for implementing new services. The study evaluated several transit options, including flexible and micro transit services, expansion of existing demand response services for seniors and individuals with disabilities, extension of nearby fixed route services, new fixed route services, and express services along I-35. Based on the evaluation, expansion of services for seniors and an on-demand micro transit program were recommended. The City is currently looking for funding sources for the programs.

Recommendations

The micro transit program is aimed at individuals without access to a personal vehicle or fixed-route bus service, offering flexible and affordable local transportation. The City should ensure that the expanded on-demand micro transit program can accommodate the needs of residents with disabilities, and that the expanded transit program effectively connects low- to moderate-income residents with employment opportunities and essential community resources.

K. FAIR HOUSING LAWS AND RECENT FAIR HOUSING LAWSUIT

1. Fair Housing Laws in Oklahoma

Oklahoma enforces fair housing protections under the Oklahoma Fair Housing Act (FHA) (Title 25, Sections 1451–1453), which prohibits discrimination in housing based on race, color, national origin, religion, sex, familial status, disability, age, gender, use of a service animal, and source of income. These laws apply to most rental, sale, and housing-related services.

However, specific exemptions allow limited discrimination:

- Owner-occupied buildings with fewer than four units are not subject to FHA regulations and discrimination lawsuits (except on race).
- Religious organizations and private clubs can limit housing to their members.
- 55+ housing communities may lawfully exclude families with children.
- Single-family home rentals/sales by owners (≤ 3 homes) without broker involvement are partially exempt.

The Oklahoma Fair Housing Act is a state-level law and is beyond the City of Moore's control. Certain exemptions may create barriers to fair housing in parts of Moore, such as for low-income renters in owner-occupied buildings with fewer than four units. However, discriminatory advertising and race-based discrimination are never allowed, regardless of exemption status. Enforcement is managed by the Oklahoma Attorney General's Office of Civil Rights Enforcement.

Fair Housing Lawsuits

There are no publicly available records of fair housing lawsuits specifically filed against the City of Moore, Oklahoma. However, on January 17, 2024, the U.S. Department of Justice filed a civil rights lawsuit against a landlord in Oklahoma for alleged violations of the Fair Housing Act (FHA), citing repeated incidents of sexual harassment toward female tenants since 2016. The landlord operated rental properties in Moore, Oklahoma City, and Forest Park, making this case directly relevant to housing conditions in Moore. While the lawsuit does not target the City itself, it highlights ongoing concerns about discriminatory practices in the local rental housing market.

Additionally, in February 2017, the U.S. Department of Housing and Urban Development (HUD) charged the landlords of a Moore rental home with violating the Fair Housing Act by denying reasonable accommodation requests from a tenant with disabilities. The tenant alleged that the property owners failed to provide reasonable accommodation by refusing to waive a pet deposit fee for his emotional support animal, in violation of the FHA's protections for individuals with disabilities.

6 REVIEW OF PRIVATE SECTOR PRACTICES

A. MORTGAGE APPLICATION TRENDS

RKG Associates reviewed the practices associated with access to rental housing options and home mortgage lending as part of an assessment of housing market conditions and identifying potential impediments to fair housing choices. The Fair Housing Act prohibits lenders from discriminating against members of the protected classes in granting mortgage loans, providing information on loans, imposing the terms and conditions of loans (such as interest rates and fees), conducting appraisals, and considering whether to purchase loans. Access to fair housing choice requires fair and equal access to the mortgage lending market regardless of race, color, national origin, religion, sex, familial status, disability, or any other statutorily protected basis.

An analysis of the mortgage applications and their outcomes can help the City identify possible discriminatory lending practices and patterns in a community. The Home Mortgage Disclosure Act (HMDA) was originally enacted by Congress in 1975 and is implemented by Regulation C. It requires many financial institutions to maintain, report, and publicly disclose loan-level information about residential mortgages. Any commercial lending institution that makes five or more home mortgage loans annually must report all residential loan activity to the Federal Reserve Bank, including information on applications denied, withdrawn, or incomplete, and tracked by race, sex, and income of the applicant. This information is used to determine whether financial institutions are serving the housing needs of their communities.

The consultants analyzed the HMDA data for Moore for the following sections:

- Mortgage Application Trends,
- Mortgage Application Approvals by Census Tract,
- Mortgage Application Denials by Race/Ethnicity, and
- High-Cost Lending.

The following sections contain analyses of city-level data for Moore:

- Mortgage Demand and Access Index Analysis,
- Real Estate Advertising and Affirmative Marketing, and
- Housing Market Overview.

The latest HMDA data available for Moore is from 2023. This study includes three years of data, from 2021 to 2023, for all types of mortgage applications received by lenders. This includes applications for all loan purposes (home purchase loans, home improvement loans, and refinancing loans) for all property types (i.e., site-built single-family homes with one to four units, site-built multi-family structures with 5 or more units, and manufactured housing units) in Moore. Figure 6-1 summarizes all the applications between 2021 and 2023 by the result, loan purpose, loan type, property type, and applicant race/ethnicity in the city.

1. Loan Application Demand

Figure 6-1

Cumulative Mortgage Application Summary, 2021 - 2023
Moore City, Oklahoma

HMDA variable	Total Applications		Originated		Approved but Not Accepted		Denied		Withdrawn by Applicant		Closed for Incompleteness	
	Count	Percent	Count	Percent	Count	Percent	Count	Percent	Count	Percent	Count	Percent
Loan Purpose												
Home Purchase	5,581	48.1%	4,033	72.3%	227	4.1%	469	8.4%	778	13.9%	74	1.3%
Home Improvement	666	5.7%	333	50.0%	32	4.8%	228	34.2%	43	6.5%	30	4.5%
Refinancing	2,559	22.1%	1,539	60.1%	126	4.9%	272	10.6%	379	14.8%	243	9.5%
Cash-Out Refinancing	2,012	17.4%	1,019	50.6%	39	1.9%	380	18.9%	378	18.8%	196	9.7%
Other Purpose	777	6.7%	350	45.0%	31	4.0%	290	37.3%	72	9.3%	34	4.4%
sum	11,595	—	7,274	—	455	—	1,639	—	1,650	—	577	—
Loan Type												
Conventional	7,519	64.8%	4,777	63.5%	321	4.3%	1,182	15.7%	920	12.2%	319	4.2%
FHA	1,958	16.9%	1,203	61.4%	76	3.9%	245	12.5%	325	16.6%	109	5.6%
VA	2,114	18.2%	1,292	61.1%	58	2.7%	211	10.0%	404	19.1%	149	7.0%
RHS/FSA	4	0.0%	2	50.0%	0	0.0%	1	25.0%	1	25.0%	0	0.0%
sum	11,595	—	7,274	—	455	—	1,639	—	1,650	—	577	—
Property Type												
Single Family (1-4 Units):Site-Built	11,116	92.5%	7,138	64.2%	350	3.1%	1,438	12.9%	1,643	14.8%	547	4.9%
Multifamily:Site-Built	51	0.4%	43	84.3%	1	2.0%	3	5.9%	4	7.8%	0	0.0%
Manufactured Housing Unit	425	3.5%	91	21.4%	104	24.5%	197	46.4%	3	0.7%	30	7.1%
sum	11,592	—	7,272	—	455	—	1,638	—	1,650	—	577	—
Race												
White	7,016	60.5%	4,551	64.9%	232	3.3%	958	13.7%	952	13.6%	323	4.6%
Black/African American	641	5.5%	343	53.5%	26	4.1%	122	19.0%	117	18.3%	33	5.1%
American Indian/Alaska Native	389	3.4%	224	57.6%	21	5.4%	63	16.2%	58	14.9%	23	5.9%
Asian	565	4.9%	356	63.0%	13	2.3%	76	13.5%	95	16.8%	25	4.4%
Native Hawaiian/Other Pacific Islander	28	0.2%	17	60.7%	0	0.0%	5	17.9%	6	21.4%	0	0.0%
Two or More Races	31	0.3%	19	61.3%	0	0.0%	6	19.4%	4	12.9%	2	6.5%
Some Other Race	565	4.9%	350	61.9%	23	4.1%	90	15.9%	77	13.6%	25	4.4%
Race Not Available	2,360	20.4%	1,414	59.9%	140	5.9%	319	13.5%	341	14.4%	146	6.2%
sum	11,595	—	7,274	—	455	—	1,639	—	1,650	—	577	—
Ethnicity												
Hispanic or Latino	1,029	8.9%	607	59.0%	51	5.0%	188	18.3%	132	12.8%	51	5.0%
sum	1,029	—	607	—	51	—	188	—	132	—	51	—

Source: HMDA Data and RKG Associates Inc., 2025

Loan Purpose

Out of a total of 11,595 loan applications recorded between 2021 and 2023, the majority were for home purchases (48.1%), followed by refinancing (22.1%) and cash-out refinancing (17.4%). Home purchase loans had the highest origination (approval) rate at 72.3%, followed by refinancing (60.1%) and cash-out refinancing (50.6%). Cash-out refinancing loan applications were more likely to be withdrawn by applicants (18.8%) compared to other loan types. In addition, except for applications for Other Purpose loans, Home Improvement loan applications had the highest denial rate of 34.2%.

The data suggests that less successful access to home improvement and cash-out refinancing loans can create a barrier to fair housing choices, with the following negative impacts:

- 1) Deterioration of Housing Quality: Without financing, homeowners may struggle to make necessary repairs or upgrades. This can lead to unsafe living conditions, reduced energy efficiency, and lower overall property values.

- 2) Reduced Property Value and Equity: Homes that are not maintained or improved may lose value over time. During this process, owners miss out on opportunities to build equity, which can be critical for financial security and wealth-building.
- 3) Limited Financial Flexibility: Cash-out refinancing loans can help homeowners tap into their home equity to obtain cash for large expenses, such as home improvements, debt repayment, and medical bills, while still having the opportunity to access a better loan term or rate. Without access, homeowners face fewer financing options and increasing financial stress, increasing the risk of foreclosure.
- 4) Widening Wealth Gaps: Disparities in access can reinforce systemic inequalities, particularly for low-income families, communities of color, or residents of manufactured housing. This affects intergenerational wealth transfer and broader economic mobility.
- 5) Negative Community Effects: Neighborhoods with a concentration of homes in disrepair may experience declining community investment, reduced curb appeal, and potentially increased crime.

This indicates a need for the City to collaborate with financial and lending institutions to provide additional support to help applicants pursuing home improvement and cash-out refinancing loans complete their applications and improve successful access to these loan opportunities.

Loan Type

The most common type of application was for conventional loans, accounting for 64.8% of all loan types. Conventional loans, loans backed by the Federal Housing Administration (FHA), and loans insured by the Department of Veterans Affairs (VA) all have similar approval rates between 61% and 64%. Only four applications were for loans backed by the Farm Services Administration or Rural Housing Service (FSA/RHS), with the lowest approval rate of 50%.

Property Type

The vast majority (92.5% of the total, 11,116 applications) of the applications were for site-built single-family homes with one to four units, with an approval rate of 64.2%. Though only 51 applications (0.4%) for site-built multi-family properties, they had the most successful approval rate at 84.3%. Applications for manufactured housing units (425 applications, 3.5% of the total) were the least successful, with the lowest loan approval rate of 21.4%, and they were more likely to be denied (46.4%) compared to other property types.

Since manufactured homes often offer a more affordable route to homeownership, the data likely indicates that providing additional support during the loan application process could enhance access to homeownership for prospective buyers or help current owners maintain their manufactured homes. In addition, the data suggests there are most likely limited housing type options other than site-built single-family homes for homeownership in Moore, which creates a barrier to fair housing choices and homeownership opportunities, as discussed in Section 5.

Applicants by Race/Ethnicity

Racial and ethnic disparities exist in terms of home mortgage application volume, loan approval rates, and denial rates in Moore. Around 60.5% of the applicants between 2021 and 2023 identified as White, who also had the highest overall approval rate of 64.9% across all loan types and purposes. This is followed by the Hispanic applicants (8.9% of the total), who had the third highest loan denial rate of 18.3%, and Black applicants (5.5% of the total), who had the lowest overall loan approval rate of 53.5% and the second highest denial rate of 19.0%. Asian applicants accounted for 4.9% of the total home mortgage applications between 2021 and 2023 in Moore, and had the second highest overall loan approval rate of

63.0%, in addition to the lowest loan denial rate of 13.5%. Native Hawaiians/Other Pacific Islanders were the least represented in home mortgage applications (0.2% of total), followed by applicants of Two or More Races (0.3%), who also had the highest denial rate of 19.4%, and Native Americans (3.4%). In addition, Native Hawaiians/Other Pacific Islander applicants had the highest number of applications withdrawn (21.4%), followed by the Black (18.3%) and Asian populations (16.8%).

This suggests that racial and ethnic disparity exists in terms of successful home mortgage access in Moore. The non-White applicants, especially those identifying as Black, Two or More Races, Native American, Native Hawaiian/Other Pacific Islanders, and Hispanic applicants, were relatively less successful in obtaining home mortgages in Moore between 2021 and 2023. In addition, the racial and ethnic distribution of loan applicants does not fully align with the 2023 racial and ethnic composition of the population in Moore (Figure 6-2). In particular, populations of All Other Races, including those of Two or More and Some Other Races, as well as the Hispanic population, were underrepresented in home mortgage applications between 2021 and 2023 in Moore, suggesting limited access to or awareness of financial opportunities such as homeownership, home improvement financing, and refinancing.

The data indicate impediments to fair housing choices in terms of homeownership and home financing options for the Hispanic and almost all non-White populations, except Asians in Moore. This highlights the need for multilingual mortgage application assistance and education for these populations to help reduce barriers to home mortgage access, homeownership, improved housing conditions, and fair housing opportunities in the city.

Figure 6-2

Racial and Ethnic Composition Trends 2000 - 2023

Moore City, Oklahoma

	2000		2013		2023		Change 2000 - 2013		Change 2013 - 2023	
	Count	%	Count	%	Count	%	Actual Chg.	Ann. % Chg.	Actual Chg.	Ann. % Chg.
White	34,814	84.6%	44,311	78.5%	44,413	70.4%	9,497	2.1%	102	0.0%
Black	1,201	2.9%	2,024	3.6%	3,348	5.3%	823	5.3%	1,324	6.5%
Native American	1,704	4.1%	2,418	4.3%	2,581	4.1%	714	3.2%	163	0.7%
Asian/HIPI	687	1.7%	1,353	2.4%	2,100	3.3%	666	7.5%	747	5.5%
All Other Race	2,732	6.6%	6,354	11.3%	10,603	16.8%	3,622	10.2%	4,249	6.7%
Hispanic	2,098	5.1%	6,722	11.9%	8,028	12.7%	4,624	17.0%	1,306	1.9%
All Minority	6,324	15.4%	12,149	21.5%	18,632	29.6%	5,825	7.1%	6,483	5.3%

Source: Decennial Census, ACS 5-Year Estimates, RKG Associates Inc., 2025

2. Home Purchase Loan Lending Trends by Race/Ethnicity

RKG specifically examined the trends of home purchase loan applications and origination between 2021 and 2023 by race and ethnicity in Moore, as most homebuyers rely on home purchase loans to access homeownership. Every racial and ethnic group experienced a decline in both applications and loan originations in 2023 compared to 2021, suggesting a broad slowdown in home mortgage application

activities. This is most likely associated with the nationwide cooling trend in the for-sale home market during this period due to interest rate hikes after a historic low, inflation, and rising housing prices.

However, some racial/ethnic groups experienced a faster drop in successful home loan originations compared to the decline in the overall loan application activities in Moore, suggesting increased barriers to home mortgage access during this period. This is especially true for the Black, Native Hawaiian/Other Pacific Islander, Two or More Races, and Hispanic applicants in Moore, aligning with their disproportionate challenges in home mortgage access discussed above (Figure 6-3).

Figure 6-3

Home Purchase Loan Application and Origination Percent Change by Race and Ethnicity, 2021 - 2023
 Moore City, Oklahoma

	Applications	Originations
White	-36.7%	-39.9%
Black/African American	-25.2%	-36.4%
American Indian/Alaska Native	-40.5%	-39.3%
Asian	-31.8%	-31.5%
Native Hawaiian/Other Pacific Islander	-50.0%	-100.0%
Some Other Race	-25.8%	-11.2%
Two or More Races	-16.7%	-40.0%
Hispanic or Latino	-20.1%	-29.1%
Race Not Available	-11.5%	-15.8%

Source: HMDA Data and RKG Associates Inc., 2025

B. GEOGRAPHIC DISTRIBUTION OF MORTGAGE APPLICATION APPROVAL

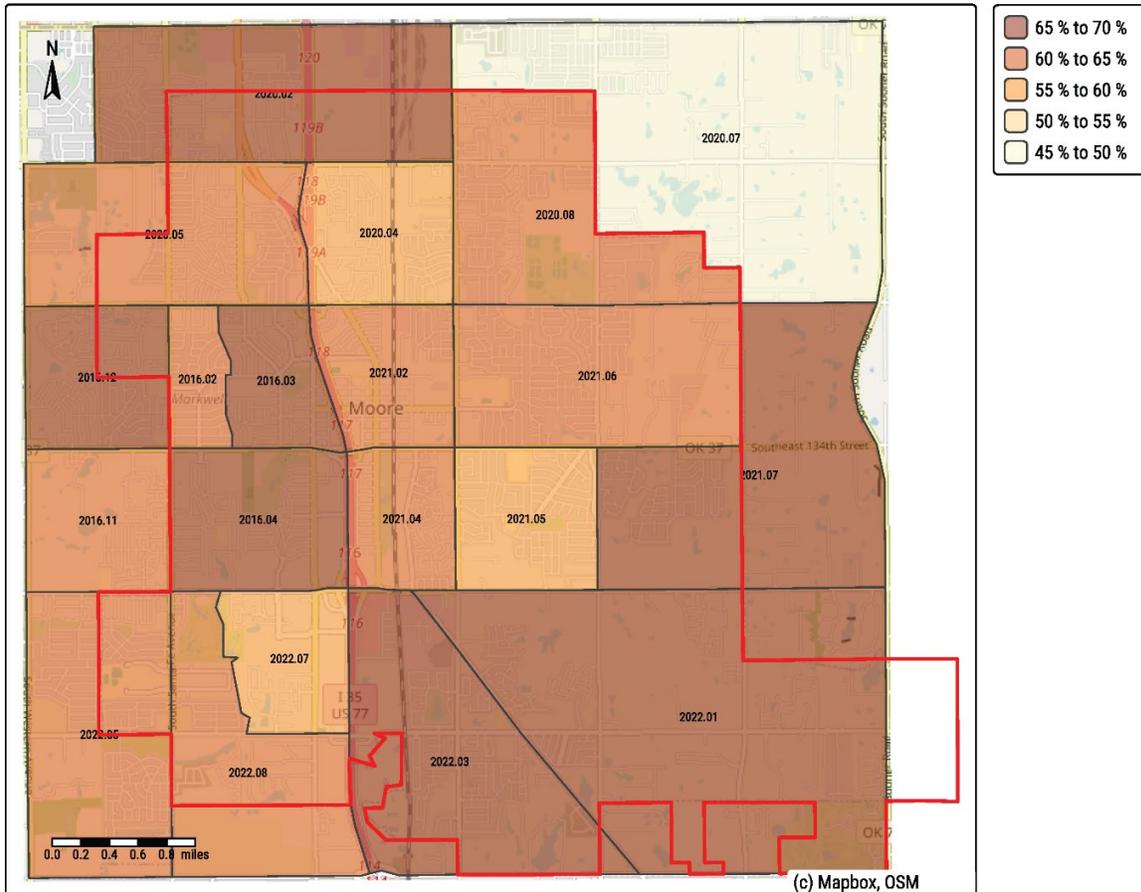
Combining data from 2021 to 2023, the cumulative citywide mortgage application approval rate is around 62.7%. The highest approval rate is found in the southeastern part of the city (Census Tracts 2021.07, 2022.01, 2022.03) and the northwestern part of the city (Census Tracts 2020.02, 2016.03, 2016.04, and 2016.12) (Figure 6-4). This is a positive sign, indicating that geographic discrimination against minority- and Hispanic-concentrated neighborhoods in home mortgage applications is not likely present in Moore.

However, note that the Hispanic and minority populations are generally underrepresented in home mortgage loan borrowing in Moore. It is also possible that the successful approvals of home mortgage applications in Census Tracts 2016.03, 2016.04, and 2016.12 were for White applicants. In general, the mortgage approval rate depends on both the number of applications and the number of approved cases in a certain neighborhood, which are associated with numerous factors, including applicants' preference for a certain neighborhood and the demographic and economic status of the applicants, such as credit scores.

To quantify how successful applicants were in pursuing home mortgage financing in each neighborhood compared to the rest of the city between 2021 and 2023, RKG developed a special matrix, and this analysis is detailed below in Part D (Page 6-9): Housing Demand and Access Index Analysis.

Figure 6-4

**Cumulative Mortgage Application Approval Rate, 2021 - 2023
Moore City, Oklahoma Census Tracts**



C. MORTGAGE APPLICATION DENIALS

Between 2021 to 2023, 1,639 applications for home mortgages across loan purposes and types were denied, with a cumulative denial rate of 14.1%. Among the 1,639 denied applications, the HMDA data provided detailed denial reasons for 1,594 applications categorized by the primary reasons and by applicant race/ethnicity. The most common type of reason for denial was unqualified debt-to-income ratios (32.2%), followed by credit history issues (29.9%) and incomplete credit applications (11.2%). In comparison, employment (1.7%) history was the least common reason, accounting for the lowest number of denied applications. (Figure 6-6).

This pattern differs among the applicants by racial and ethnic groups. Asian, Native Hawaiian/Other Pacific Islander, and Hispanic applicants were more likely to be denied due to unqualified debt-to-income ratios than other racial/ethnic groups. Black and Native American applicants, as well as applicants of Two or More or Some Other Races, were more likely to be denied due to credit history issues compared to other races and ethnicities in Moore.

Geographically, the highest denial rate within Moore is between 15% to 20 % and is seen in Census Tracts 2020.04, 2021.05, and 2022.08. Note that Tract 2021.05 had one of the lowest composite index scores for fair housing opportunities, and Tracts 2020.04 and 2022.08 had fast gains in median household incomes and population between 2013 and 2023, as discussed in Section 3.

Figure 6-5
Cumulative Mortgage Application Denial Rate,
2021 - 2023
Moore Oklahoma Census Tracts

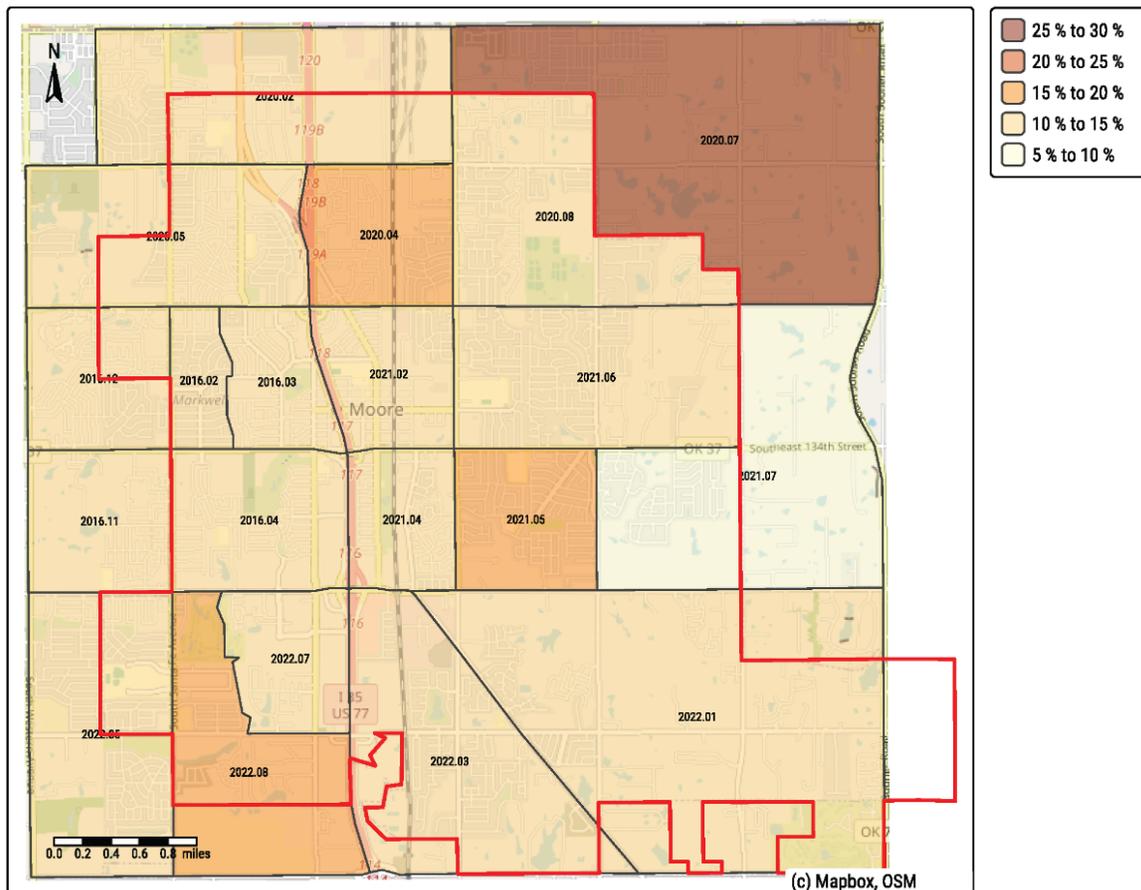


Figure 6-6

Denial By Reason by Race and Ethnicity, 2021 - 2023

Moore City, Oklahoma

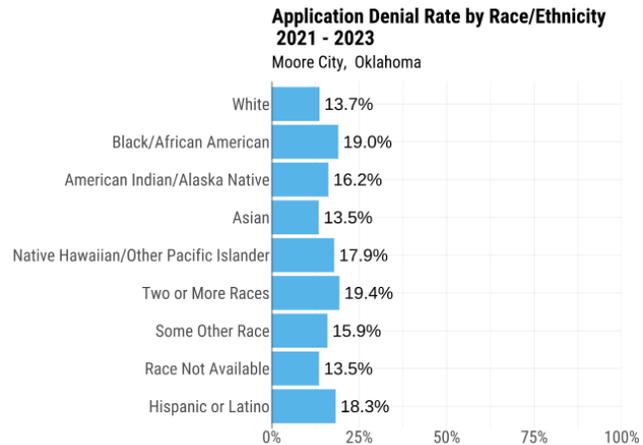
	All Races/Ethnicity	White	Black/African American	American Indian/Alaska Native	Asian	Native Hawaiian/Other Pacific Islander	Two or More Races	Some Other Race	Hispanic or Latino	Race Not Available
Count										
Total	1,594	922	122	61	72	5	6	89	181	317
Debt-to-income ratio	513	302	35	15	26	2	2	29	62	102
Employment history	27	14	2	2	3	0	0	2	4	4
Credit history	476	287	41	21	11	0	2	35	48	79
Collateral	163	93	13	2	8	1	2	8	19	36
Insufficient cash (downpayment, closing costs)	31	21	1	5	1	1	0	0	4	2
Unverifiable information	57	27	7	3	7	0	0	2	13	11
Credit application incomplete	178	94	9	5	10	1	0	9	17	50
Other	149	84	14	8	6	0	0	4	14	33
Percent										
Total	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%
Debt-to-income ratio	32.2%	32.8%	28.7%	24.6%	36.1%	40.0%	33.3%	32.6%	34.3%	32.2%
Employment history	1.7%	1.5%	1.6%	3.3%	4.2%	0.0%	0.0%	2.2%	2.2%	1.3%
Credit history	29.9%	31.1%	33.6%	34.4%	15.3%	0.0%	33.3%	39.3%	26.5%	24.9%
Collateral	10.2%	10.1%	10.7%	3.3%	11.1%	20.0%	33.3%	9.0%	10.5%	11.4%
Insufficient cash (downpayment, closing costs)	1.9%	2.3%	0.8%	8.2%	1.4%	20.0%	0.0%	0.0%	2.2%	0.6%
Unverifiable information	3.6%	2.9%	5.7%	4.9%	9.7%	0.0%	0.0%	2.2%	7.2%	3.5%
Credit application incomplete	11.2%	10.2%	7.4%	8.2%	13.9%	20.0%	0.0%	10.1%	9.4%	15.8%
Other	9.3%	9.1%	11.5%	13.1%	8.3%	0.0%	0.0%	4.5%	7.7%	10.4%

Source: HMDA Data and RKG Associates Inc., 2025

As mentioned earlier, the cumulative overall mortgage application denial rate in Moore is 14.1%, including applicants without reported race data. However, denial rates differ across racial and ethnic groups. Only the Asian and White applicants have denial rates lower than the citywide average of 14.1%. This means that these two population groups tend to access home mortgages more successfully than average between 2021 and 2023.

In comparison, all other non-White minority/ethnic applicants are more likely to have their home mortgage applications denied in Moore. Applicants of Two or More Races face the highest denial rate at 19.4%, followed by the Black (19.0%), and the Hispanic applicants (18.3%) (Figure 6-7).

Figure 6-7



Source: HMDA Data and RKG Associates, Inc., 2025

Note that this data aligns with the trends previously discussed, indicating that non-White populations, especially applicants identifying as Black, Two or More Races, and Hispanic, face limited access to home loan opportunities such as home ownership and home improvement financing, suggesting impediments to fair housing choices in the private lending sector for these groups. The City should expand its collaboration with financial lending institutions and housing organizations such as the Metropolitan Fair Housing Council (MFHC) of Oklahoma to advertise and promote existing financial literacy education and mortgage application assistance, in addition to providing additional multilingual assistance and services to target credit history and application completion issues among minority applicants.

D. MORTGAGE DEMAND AND ACCESS INDEX ANALYSIS

RKG Associates prepared a special analysis of housing demand and access that examined how each racial or ethnic group performed on mortgage loan applications within each census tract in Moore between 2021 and 2023. The purpose of the analysis was to identify patterns of performance differences within each racial or ethnic group as compared to how the group performed on average across all census tracts in the city over the two years. "Mortgage Demand and Access Index" is a statistical measure created by RKG Associates to measure and compare the relative success rate of mortgage loan applications for each racial and ethnic group based on:

- (1) The group's ability to pay or purchase a home,
- (2) The proportion of the applicants by racial and ethnic group of the total population of loan applicants,
- (3) The loan denial rate by racial and ethnic group
- (4) The propensity of each racial and ethnic group to buy or rent within the census tracts in the city based on known housing tenure rates.

1. Home Purchase Loan Application Activity

Among the 4,434 home purchase loan applications with documented race and ethnic information of applicants (excluding records with no racial/ethnic data) in Moore, 73.0% were submitted by white applicants. Home purchase loan applications among racial/ethnic minority groups tend to be less common compared to White applicants. The Hispanic population, though accounting for only 10.2% of the total home purchase loan applicants in Moore, represented the largest group apart from the White applicants. This is followed by Asian applicants (8.1%). Applicants identifying as of Two or More Races and as Native Hawaiian are the least represented in home purchase loan applications (0.4%), followed by the American Indian/Alaska Native population (4.7%) and the Black population (6.7%) (Figure 6-8).

Compared to Moore’s racial and ethnic composition in 2023 (Figure 6-2), between 2021 and 2023, individuals of Two or More Races, Some Other Race, and the Hispanic population are underrepresented

Figure 6-8

Home Purchase Loan Application by Race/Ethnicity, 2021 - 2023

Moore City, Oklahoma

Applicant Race/Ethnicity	Number	Percent
Race		
White	3,235	73.0%
Black/African American	298	6.7%
American Indian/Alaska Native	208	4.7%
Asian	361	8.1%
Native Hawaiian/Other Pacific Islander	16	0.4%
Two or More Races	16	0.4%
Some Other Race	300	6.8%
sum	4,434	100.0%
Ethnicity		
Hispanic or Latino	452	10.2%

Source: HMDA Data and RKG Associates Inc., 2025

in home purchase loan applications in Moore. This highlights racial and ethnic disparities in access to homeownership and mortgage opportunities in the private sector, indicating that these minority groups most likely face more barriers to fair housing choices in terms of home mortgage access (Figure 6-8).

2. Ability-to-Pay Index

The first factor of the Housing Demand and Access Index is the “Ability-to-Pay” Index by race and ethnicity, which is the proportion of a racial/ethnic group’s median household income at the city level compared to Moore’s citywide median of \$76,941. The city-level median household income and all

median household income by race/ethnicity figures were obtained from the U.S. Census Bureau American Community Survey (ACS) 2023 estimates.

An applicant’s ability to successfully obtain mortgage financing depends on several factors, but is mostly dependent on the applicant’s ability to pay for mortgage expenses (i.e., principal, interest, taxes, and insurance). Households with higher incomes will often have more options and access to greater housing choices and mortgage loans.

The Ability-to-Pay Indices that are above 1.0 represent higher household incomes than the city median, and those below 1.0 represent income levels lower than the city median. Black and Asian households have Ability to Pay Index values above 1.0, indicating the highest ability to afford homeownership. In contrast, American Indian and Hispanic populations, as well as people of Some Other Race, have index values below 1.0, generally aligning with previously observed trends of less successful home mortgage access and underrepresentation in home purchase loan applications. Note that no median household income data were available for the Native Hawaiian/Other Pacific Islander population in Moore in 2023, according to the ACS 2023 5-Year Estimates (Figure 6-9).

Figure 6-9

Ability-to-Pay Index by Race/Ethnicity, 2023

Moore City, Oklahoma

	Median Household Income	Income to Value	Ability to Pay Index
All Races/Ethnicity	\$76,941	2.5	1.0
White	\$76,047	2.5	1.0
Black/African American	\$104,246	1.8	1.3
American Indian/Alaska Native	\$60,361	3.1	0.7
Asian	\$103,229	1.8	1.3
Native Hawaiian/Other Pacific Islander	NA	NA	NA
Some Other Race	\$65,605	2.9	0.8
Two or More Races	\$74,861	2.5	1.0
Hispanic or Latino	\$66,027	2.9	0.8

Source: HMDA Data and RKG Associates Inc., 2025

3. Mortgage Demand Index

The “Mortgage Demand Index” is the proportion of the number of home purchase loan applications submitted between 2021 and 2023 by each racial and ethnic group as a percentage of each group’s share of the current household population. For example, if the percentage of the Hispanic or Latino household population in Census Tract 1 is 7.2%, and the number of home mortgage applications from this group accounted for 10.0% of the total submitted in this Census Tract, then the Mortgage Demand Index is 1.4 (10.0% ÷ 7.2% = 1.4) in this census tract for the Hispanic or Latino population. This index value accounts for the fact that many people tend to gravitate to various neighborhoods that they prefer or where other

people in their social network, racial, and ethnic groups already live. In some respects, people naturally self-select their neighborhoods based on these and many other factors, real and perceived.

4. Mortgage Success Index

The “Mortgage Success Index” measures the relative net success rate of home purchase loan mortgage originations to mortgage denials by race/ethnicity. For example, if Census Tract 2 has 58 mortgage loan applications either approved or denied and a total of 8 denials, then this results in a net of 50 mortgage loans approved and originated, at a net success rate of 86%. For American Indian/Alaska Native applicants, if there are four mortgage applications either approved or denied and there is no denial, then their net success rate would be 100% in this Census Tract. Therefore, their Mortgage Success index would be 1.16 ($100\% \div 86\% = 1.16$).

5. Results of Mortgage Demand and Access Index

Once the three key indices were calculated for each racial and ethnic group in Moore, an overall “Mortgage Demand and Access Index” was calculated. This analysis does not account for access issues related to rental housing and is not considered a definitive indicator of different populations’ ability to access mortgage loans.

To obtain a final score for each group, RKG weighted each index score to reflect its relative importance to each group’s ability to obtain mortgage financing for home purchases. The Ability-to-Pay Index received the highest weighting factor at 50% of the final score since it is the strongest determinant of success in pursuing a mortgage loan. Income is also correlated with a household’s credit score, which is another important factor leading to a favorable credit decision.

The Net Mortgage Success Index was assigned a weighting factor of 35%, and the Mortgage Demand Index was assigned a weighting factor of 15% so that variations between the demand and success among the various racial and ethnic groups could be identified. Net mortgage success is a function of a lot of factors, but is mostly related to a group’s ability to successfully obtain a mortgage loan to purchase a home. While some of those factors are related to a group’s ability to pay, credit scores, and similar factors, excessive loan denial rates could denote something else. Conversely, a group’s success rate at obtaining mortgage financing can only be largely judged by the demand exhibited by each group to live in these neighborhoods. However, if Hispanic households pursue mortgage loans in certain neighborhoods but are denied at rates exceeding their citywide denial rates, this may indicate that barriers exist.

The values shown in Figure 6-10 reflect the average citywide index value by racial/ethnic group. Note that the Native Hawaiian/Other Pacific Islander population has zero-value index scores because there is no citywide median household income data in 2023 for this racial group, according to the American Community Survey 2023 5-year estimates.

Other than the White population, people identifying as Two or More Races and Hispanic have Demand and Access Index scores below 1. All other racial and ethnic groups have scores at or above the citywide average. This matches with our previous findings that the Hispanic population and the population of Two or More Races/Some other Race face more challenges and underrepresentation in home purchase loan access, as well as higher mortgage application denial rates and lower ability to pay. However, it’s important to note that the Demand and Access Index does not account for all the various factors that can influence a group’s ability to secure a home mortgage loan. In addition, note that the American

Indian/Native Alaska population also has a lower ability to pay, and Black applicants also face higher home mortgage denial rates.

Figure 6-10

Housing Demand and Access Index, City-Wide Average

Moore City, Oklahoma

Racial/Ethnic Groups	Average
Total Racial/Ethnic Groups	1.0
White	0.9
Black/African American	1.1
American Indian/Alaska Native	1.0
Asian	1.4
Native Hawaiian/Other Pacific Islander	0.0
Two or More Races	0.6
Some Other Race	1.1
Hispanic or Latino	0.9

Source: HMDA Data and RKG Associates Inc., 2025

E. HIGH-COST LENDING

A subprime mortgage is a type of home loan issued to borrowers with low credit scores (often below 600) who are unqualified for conventional mortgages. Subprime mortgages usually come with much higher interest rates and down payments than conventional options because the borrowers often are at higher default risks. However, more expensive subprime loans are sometimes issued to some borrowers with high enough household incomes, credit scores, and available down payments to qualify for conventional loans. Historically, this is especially true for minority groups, which usually see higher percentages of subprime borrowers. The decision and practice of subprime lending targeting borrowers’ racial or ethnic status constitutes mortgage discrimination.

Since 2005, the Housing Mortgage Disclosure Act data has included a new category of information called “rate spread.” It represents the difference between the loan interest rate and the prevailing U.S. Treasury standard. Though HMDA does not require lenders to report credit score data of applicants, which can be used to determine which loans are subprime, the “rate spread” data can help identify “high-cost” loans, a strong predictor of subprime lending and possible mortgage discrimination.

A loan is considered a high-cost loan if it meets one of the following criteria:

- A first-lien loan with an interest rate at least three percentage points higher than the prevailing U.S. Treasury standard at the time the loan application was filed. The standard is equal to the current price of comparable-maturity Treasury securities.
- A second-lien loan with an interest rate of at least five percentage points higher than the standard.

The prevalence of high-cost lending varies across borrowers' racial or ethnic groups between 2021 and 2023 in Moore. The average high-cost lending rate for all racial/ethnic groups is 3.4%, which is calculated by comparing the number of high-cost lending cases to the total amount of originated as well as approved but not accepted applications. This is a generally low percentage. However, Hispanic borrowers were more likely to experience high-cost lending than average during the three years compared to other groups, with the highest high-cost lending rate of 5.0%. This is followed by applicants of Some Other Race (4.6%) and those identifying as American Indian/Alaska Native (4.1%). This data is also consistent with the finding discussed above in terms of disparities in housing demand and access (Figure 6-11).

Figure 6-11

Cumulative High Cost Lendings by Race/Ethnicity, 2021 - 2023

Moore City, Oklahoma

	Total Originated/Approved Not Accepted Applications	No. of High Cost Lendings	High Cost Lending Rate
Race			
White	4,783	122	2.6%
Black/African American	369	9	2.4%
American Indian/Alaska Native	245	10	4.1%
Asian	369	3	0.8%
Native Hawaiian/Other Pacific Islander	17	0	0.0%
Two or More Races	19	0	0.0%
Some Other Race	373	17	4.6%
Race Not Available	1,554	95	6.1%
sum	7,729	256	—
Total	—	—	3.4%
Ethnicity			
Hispanic or Latino	658	33	5.0%

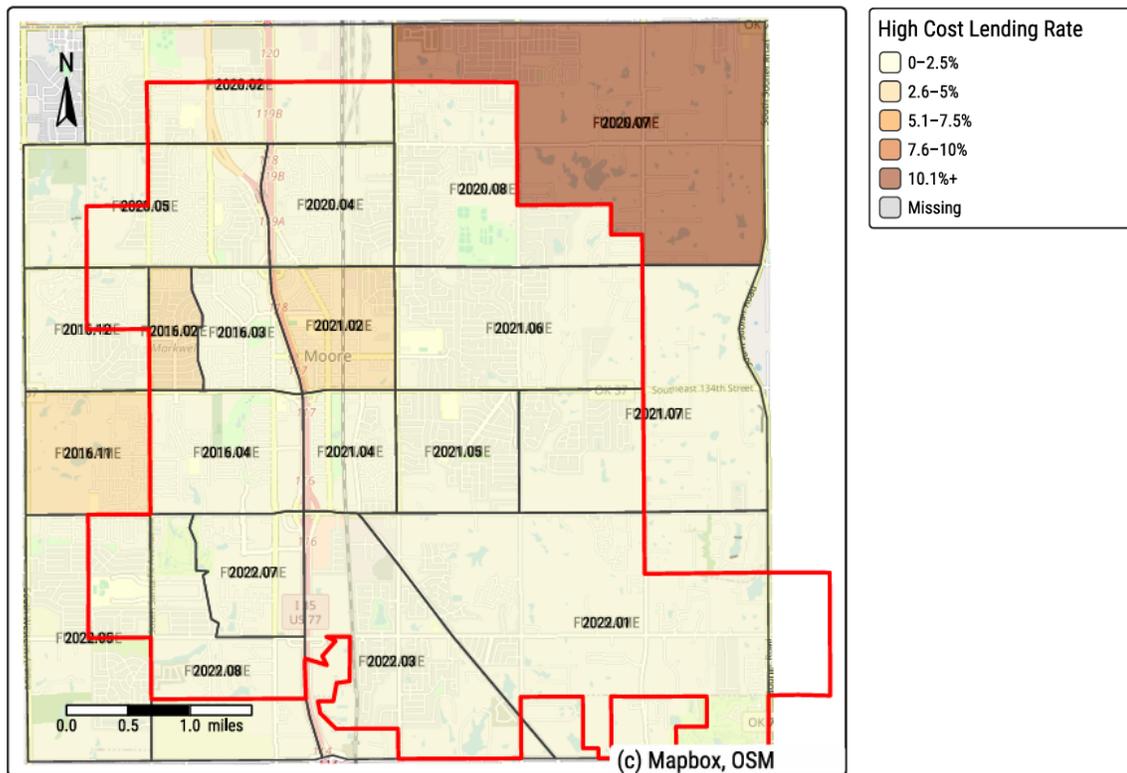
Source: HMDA Data and RKG Associates Inc., 2025

The cumulative high-cost lending rates between 2021 and 2023 were then mapped by census tracts. The darker shades indicate census tracts that are more likely to experience high-cost lending practices. The high-cost lending hot spot (10.1%+) is outside the Moore city boundary (Census Tract 2020.07), in Oklahoma City. Census Tracts within Moore that have high-cost lending rates relatively higher, overlap with areas with a higher level of poverty exposure, lower school proficiency, lower labor market engagement, and a higher proportion of households with lower incomes, as discussed in Section 3 (Census Tracts 2016.02, 2021.0).

The data from Figure 6-11 suggests some correlation between high-cost lending and certain minority and ethnic groups and neighborhoods, especially the populations identifying as Some Other Race, Native American, and Hispanic in the city. However, more evidence and data are needed to determine whether the higher occurrence of subprime loans among these populations is intentional targeting. Nonetheless, the data indicate that these populations face more impediments to successful home mortgage access and fair housing choices in Moore, aligning with previous findings.

The City should take proactive measures to engage with financial lending institutions and fair housing/homeownership assistance providers (e.g., Metropolitan Fair Housing Council (MFHC) of Oklahoma) to improve applicants' understanding and awareness of high-cost lending, in addition to their application qualifications such as credit scores, credit history, and ability to pay.

Figure 6-12
Cumulative High Cost Lending Rate, 2021 - 2023
Moore City, Oklahoma Census Tracts



F. REAL ESTATE ADVERTISING AND AFFIRMATIVE MARKETING

RKG Associates also examined Realtor websites to assess if real estate brokers and sales offices are providing information supporting people's rights to fair housing choices in their advertising and marketing practices. This assessment also examined whether potentially discriminatory language was used on real estate listing websites in Moore's home sales and rental markets.

In general, no real estate listing website samples examined for this study contain discriminatory language. On the other hand, the provision of information related to the Fair Housing Act and fair housing choices is inconsistent across different websites. In general, major real estate listing services such as Century 21, Zillow/Trulia, Apartments.com, and Coldwell Banker have specific statements expressing the key principles of the Fair Housing Act and the Equal Opportunity Act.

For example, Century 21 prohibits “discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions.” Also, each Century 21 Real Estate LLC franchised office is contractually required to comply, in all respects, with all laws, rules, and regulations applicable to the real estate industry, including, without limitation, the requirements imposed by the Fair Housing Act. Apartments.com prohibits advertising “any preference, limitation, or discrimination because of race, color, religion, sex, handicap, familial status, or national origin, or intention to make such preference, limitation or discrimination.” Zillow/Trulia has provided a detailed article explaining the basics of the Fair Housing Law (<https://www.zillow.com/rental-manager/resources/fair-housing-guide/>). Coldwell Banker has a dedicated Fair Housing page that lists the laws that protect fair housing rights, the responsibilities of home sellers and real estate professionals, and resources to seek help when the violation of rights occurs.

On the other hand, among a sample of ten local real estate agency websites reviewed by RKG, only one, ERA Courtyard Real Estate, provides a dedicated fair housing link to resources that follow the guidelines set by HUD. Three websites (Metro First Realty, McGraw Realty, and Keller Williams Realty, LLC) include a Fair Housing Statement from their firms, but do not link to specific Fair Housing resources. Half of the agencies sampled, including Homes by Breann Team (affiliated with Hamilwood Realty), MarketPro Homebuyers, Clearpoint Realty, Amanda Rose Real Estate Group, and Arrived OKC, offer no fair housing language, logo, or resources on their websites. One agency, Salt Real Estate, acknowledges that its purpose is to serve lower-income households but does not provide any additional fair housing language or related resources on its website.

G. HOUSING MARKET OVERVIEW

Residential sales activities, home value, and rent levels are vital indicators of the overall well-being of a community’s housing market, displaying the relations between housing demand and supply. The RKG team obtained the residential sales data from Redfin.com, in addition to the median home value and the median monthly gross rent data from the American Community Survey 2023 5-Year Estimates, to provide an overview of Moore’s housing market.

1. Home Value and Sales Trend

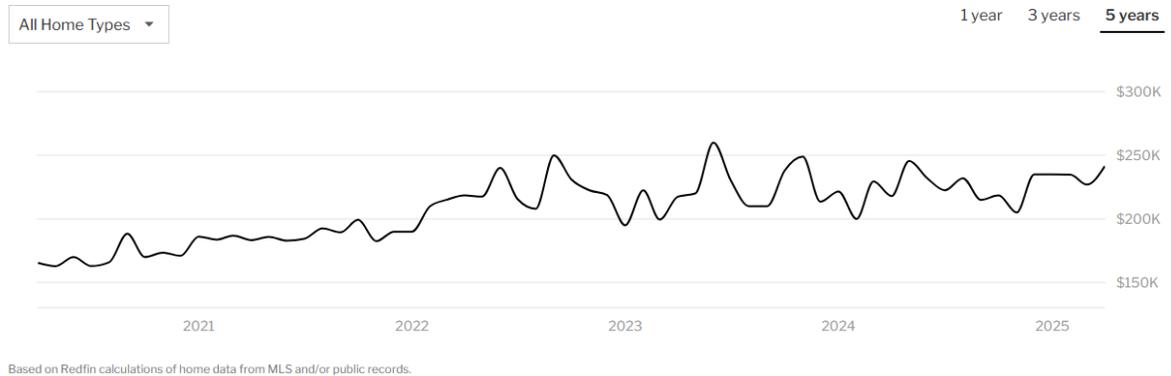
According to the data from Redfin.com, Moore’s housing market is somewhat competitive, with a Redfin Compete Score of 57 out of 100 in April 2025. This means that “Some homes get multiple offers but typically take weeks to sell”. The average homes sell for around 2% below the listing price and go pending in around 41 days. Popular homes can sell for around the listing price and go pending in around 8 days. According to neighborhoodscout.com, a real estate and neighborhood analytics website, although Moore’s house values don’t compare to the most expensive residential properties in the U.S., the city’s home prices are some of the most expensive in Oklahoma.

According to Redfin, “Compete Score rates how difficult it is to win a home in an area. Using a combination of proprietary Redfin data and data from local multiple listing services (MLS), Compete Score is primarily calculated based on four inputs: number of competing offers, waived contingencies, sale-to-list ratio, and number of days on market.”

In addition, Moore’s median home sale price in April 2025 was \$243,000, which is a 11.5% growth compared to a year ago. Compared to the median sale price of \$162,900 in May 2020, the city’s median home sale price was up by 49.2% over the five years, which is a 9.8% annual growth.

In April 2025, homes in Moore sold after 52 days on the market on average. A total of 82 homes were sold in April 2025, slightly decreasing from 85 a year ago, a 3.5% year-over-year decline. While home prices in Moore continue to rise, the downward trend in sales volume and the longer median days on the market since 2020 suggest that buyer demand is slowing after the peak during the COVID-19 pandemic, a trend that is commonly seen nationwide. (Figure 6-13).

Figure 6-13: Moore Median Sale Price, Apr. 2020 to Apr. 2025



According to the 2023 American Community Survey (ACS) 5-Year Estimates, the median home value in Moore increased by 58.1% between 2013 and 2023, reflecting an average annual growth rate of 5.8% (Figure 6-14). This mirrors the rising trend in median home sale prices discussed earlier. In addition, the growth in home values has outpaced the rise in median household income over the same period, indicating that home prices have escalated more rapidly than residents' earnings.

The data suggests that people’s ability to pay is falling behind the price hikes in homes in the city, resulting in less buying power for homeownership. Therefore, the increasing home prices are and will continue to be a challenge for the lower-income and most vulnerable residents if their incomes and ability to pay for housing are not improved.

Figure 6-14

Housing & Income Trends, 2013 - 2023

Moore City, Oklahoma

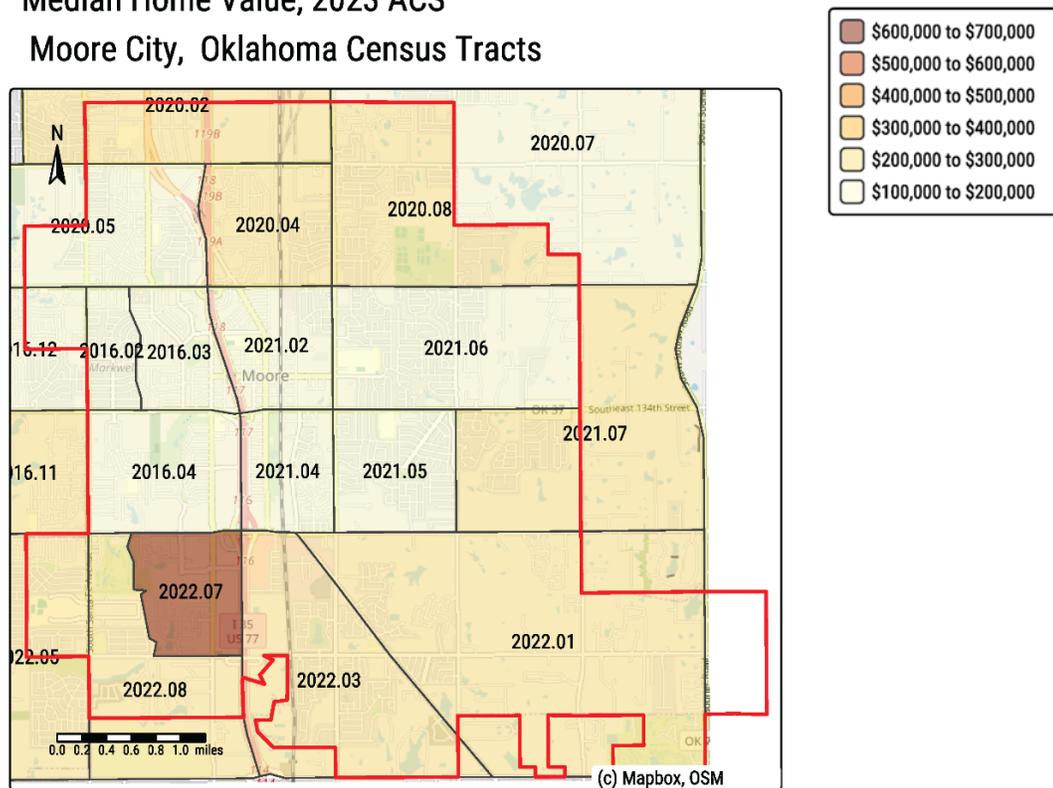
	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	Change 2013 - 2023	
												Actual Chg.	% Chg.
Median Gross Rent	\$884	\$911	\$902	\$934	\$963	\$1,006	\$1,021	\$1,064	1114	\$1,208	\$1,276	\$392	44.3%
Median Home Value	\$119,700	\$121,700	\$124,100	\$126,200	\$133,900	\$135,400	\$139,300	\$148,500	154100	\$170,300	\$189,300	\$69,600	58.1%
Median Household Income	\$57,294	\$58,542	\$58,169	\$60,474	\$62,347	\$64,810	\$65,915	\$67,851	68562	\$73,285	\$76,941	\$19,647	34.3%

Source: ACS 5-Year Estimates, RKG Associates Inc. 2025

Figures 6-15 and 6-16 display the 2023 median home values and the annual percentage changes of median home value between 2018 and 2023 by census tract in Moore. The data was also obtained from the 2023 American Community Survey 5-Year Estimates.

In 2023, home values in Moore tend to be lower in neighborhoods on the central and northwest side of the city, where there are concentrations of Hispanic and other minority populations, higher levels of poverty rate exposure, lower homeownership rates, and less access to resources and opportunities. In contrast, relatively higher median home values are found in the southern side of the city (Census Tracts 2022.07, 2022.08, 2022.03, and 2022.01) where households have higher median incomes, greater workforce participation, stronger composite index scores, and better environmental quality, as discussed in Section 3.

Figure 6-15
Median Home Value, 2023 ACS
Moore City, Oklahoma Census Tracts



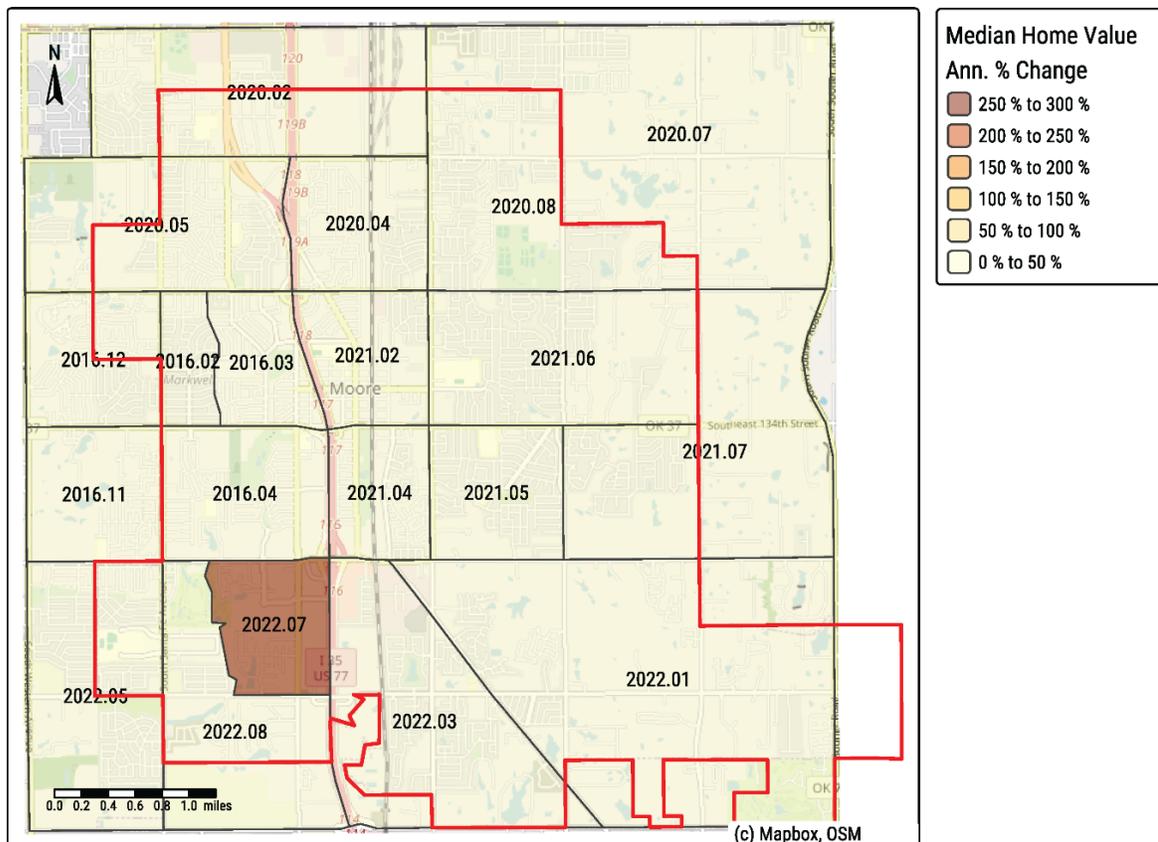
Note that Census Tract 2022.07 has experienced the fastest annual home value growth between 2018 and 2023. This census tract has a higher environmental quality, as noted in Section 3. This data suggests that residents living on the southern sides of Moore face a higher risk of declining housing affordability and limited fair housing choices in this part of the city. It highlights the need for the City to take proactive steps to stabilize and preserve existing housing affordability in northwest and central Moore, in addition to increasing attainable housing options in the southern part of the city.

2. Rental Rate Overview

Figure 6-14 shows that the citywide median gross rent in Moore between 2013 and 2023 rose by 44.3%. This is faster than the median household income growth in the city during the same decade, which increased by 34.3%. This means that diminishing rental housing affordability is an issue that creates barriers to fair housing access in Moore, as residents' ability to pay for rental housing costs lags behind the rising rent levels in the city.

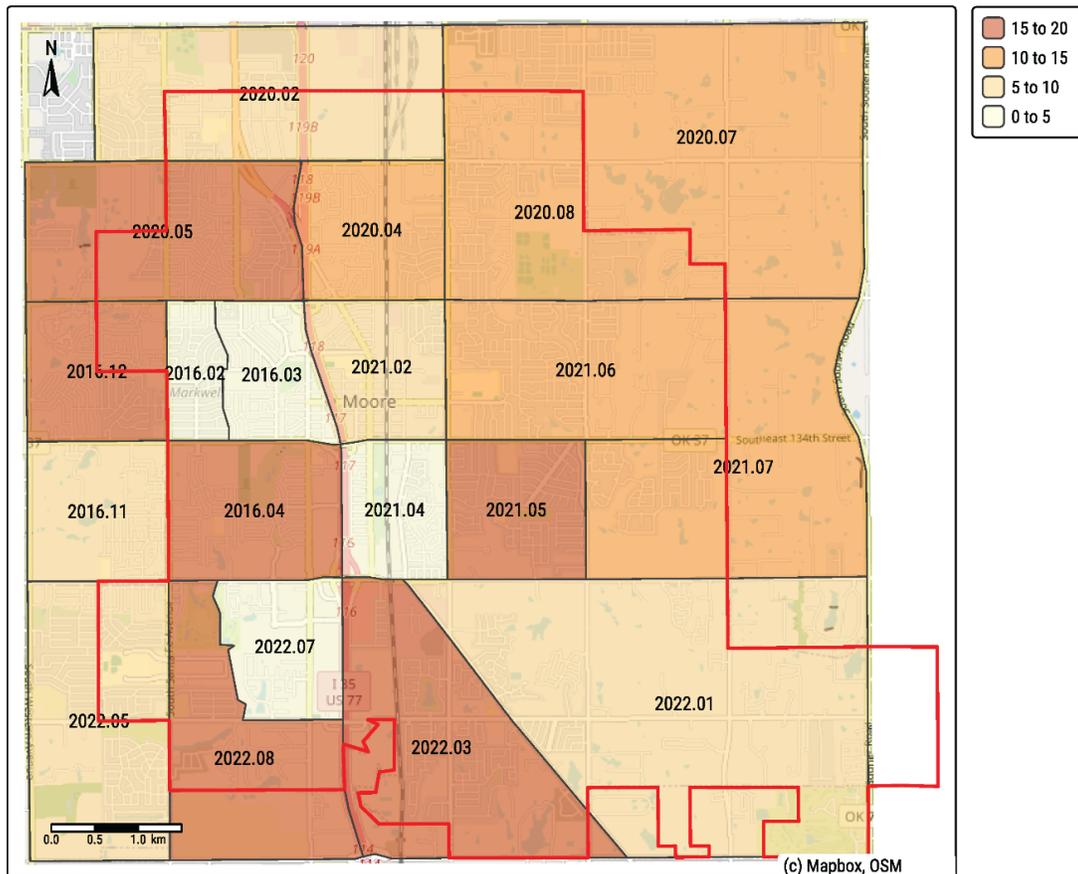
RKG also adopted a ranking method to show which neighborhoods in and around the city have higher rent rates, considering all bedroom types. All census tracts with available median gross rent data were ranked and received scores based on their median gross rents from low to high under each bedroom type. If the median gross rent for a certain bedroom type is not available in a census tract, then it receives a score of zero. The total score of all bedroom types was then summed for each census tract, which was ranked again based on its total score.

Figure 6-16
Median Home Value Annual Percent Change, 2018 - 2023 ACS
Moore City, Oklahoma Census Tracts



The results were mapped by census tract, with darker shades indicating higher total scores and, therefore, higher median gross rent levels considering all bedroom types. The result shows that higher median gross rents across all bedroom types are mostly clustered along the I-35 corridor on Moore's west side, consistent with areas with a higher presence of renters. Tracts such as 2016.12, 2020.05, 2016.04, and 2021.05 rank high in median gross rent. This is coupled with higher concentrations of Hispanic populations, elevated poverty rates, and lower composite scores in terms of demographic and housing issues, as discussed in Section 3. Tracts 2022.03 and 2022.08 also show higher rents, most likely tied to more economic opportunities and higher composite index scores. These patterns reveal that lower-opportunity neighborhoods do not always have access to the lowest rent levels. Without access to publicly supported rental housing, low- and moderate-income renters face limited affordable housing options. This highlights the city's overall shortage of accessible and affordable rental housing, which creates barriers to fair housing choices for renters in Moore (Figure 6-17).

Figure 6-17
Median Gross Rent Ranking for All Bedroom Types, 2023 ACS
Moore City, Oklahoma Census Tracts



7 IMPEDIMENTS TO FAIR HOUSING CHOICE

This section summarizes the impediments to fair housing choice within the City of Moore, Oklahoma, presented in this analysis, along with associated recommendations for the City. This section also summarizes the stakeholder interviews conducted for this study to provide anecdotal and qualitative evidence.

A. STAKEHOLDER INTERVIEWS

The consultant spoke with nine housing-related stakeholders serving Moore between April 2025 and July 2025. These interviews aim to help understand the current focus and capacity of these entities and organizations, as well as the existing housing demand and impediments to fair housing in Moore. All the interviewed organizations and entities serve areas that include the City of Moore. Topics discussed include affordable housing development, housing demand and challenges, and fair housing issues. The interviewed entities include:

- Metropolitan Fair Housing Council of Oklahoma, Inc.,
- Central Oklahoma Community Action Agency,
- Oklahoma Housing Finance Agency,
- Neighborhood Housing Services Oklahoma,
- Belmont Management,
- Cleveland County Continuum of Care, and
- Moore Youth and Family.

Note that the section below is purely a summary and documentation of the interviewees' opinions and perspectives. They are not statements or opinions of RKG, nor necessarily facts. However, even if there are limitations in these interviewees' perspectives, they reflect how some housing service organizations and stakeholders perceive the existing housing issues in the city, pointing to areas that Moore should focus on while planning future housing strategies.

Barriers to Homeownership

- One stakeholder stated that many families are forced to rent despite their desire to own, due to a shortage of affordable homes for purchase and challenges such as low credit scores that limit mortgage eligibility. Note that this is also consistent with the findings from Section 6, that credit history is a common reason for home mortgage application denials.
- A significant portion of applicants seeking homeownership services earn 80% or less of the Area Median Income (AMI) and face difficulty securing mortgages, particularly those with incomes at or below 60% of AMI.
- Many stakeholders emphasized a critical need for down payment assistance and similar programs to help low- and moderate-income households compete in the housing market.

Lack of Affordable Housing Supply

- Many interviewees stressed that the city lacks sufficient affordable housing, both for rent and for sale, particularly for elderly or disabled individuals and single-parent households with two or more children. Note that this also aligns with the findings from Section 5 that family households and households with disabilities are likely the most vulnerable populations facing limited attainable housing choices outside of publicly supported housing programs in Moore.
- Apart from the Moore Curve development (244 rental units, completed in 2021), there have been no new affordable housing developments or programs in Moore.
- One stakeholder expressed that housing demand in Oklahoma, including Moore, has consistently outpaced the availability of affordable units. This is associated with the fact that Moore is often perceived as a bedroom community with a convenient commute to Oklahoma City. This commuter-town dynamic draws individuals and families who want a quieter, more residential environment without being too far from employment centers. Thus, the demand for housing continues to rise, particularly for affordable units.
- Interviewees noted that developers have been unable to build affordable housing fast enough to keep up with the demand for both homeownership and rental units due to rising costs. Developers also noted that low-cost land acquisition is a critical factor in securing competitive LIHTC funding awards in Oklahoma.

Rising Costs Increase Funding Needs and Reduce Affordability

- Interviewees stated that construction costs have increased significantly, creating barriers for affordable housing development. High development costs were also noted in the previous Analysis of Impediments (AI).
- Interviewees expressed that the cost of rent, utilities, and basic living expenses continues to rise.
- While affordable rent in Oklahoma averages about \$850, comparable rents in Moore are closer to \$1,250 – a notable increase since the COVID-19 pandemic, according to interviewees.
- As home prices have increased, many buyers in the region, particularly those using down payment assistance, are often left with homes priced up to \$250,000, as affordable options are limited. For context, Oklahoma City's down payment assistance program limits eligible home purchases to properties valued at up to \$190,000. As housing prices rise, this cap no longer keeps pace with the regional market. One interviewed housing organization increased the cap for its in-house down payment assistance program to \$250,000 to reflect current prices. This organization reported around 30 recent home purchase closings within the \$250,000 range among their clients receiving down payment assistance in the region, highlighting growing pressure on down payment assistance capacity due to current market conditions. This supports findings from Section 6, which indicate that home values have outpaced household income growth in Moore, further straining housing affordability.

Housing Quality Challenges

- Interviewees noted that a significant number of requests for major home repair assistance (seven to eight requests per month) come from low- and moderate-income residents. However, local service providers can only respond to three to four requests per month due to resource limitations.
- One stakeholder expressed that the lack of continued maintenance and investment by property owners has contributed to the dilapidation of housing in certain areas, especially those heavily impacted by the 2013 tornado.

Limited Local Focus

- One stakeholder noted that rental assistance in Cleveland County is limited, with most funding, such as FEMA's Emergency Food and Shelter Program, being administered by external agencies for overall needs at the county level rather than with a local focus. While the City of Moore has provided CDBG-funded rental assistance in the past, these efforts have been occasional rather than part of a regular program, and consistent support at the county level targeting Moore is lacking. Note that most of the housing-related organizations serving Moore also operate at the state, county, or regional level rather than being Moore-specific.

Need for Additional Partnerships and Funding

- Interviewees from organizations such as Central Oklahoma Community Action Agency and Neighborhood Housing Services expressed interest in expanding collaboration with the City of Moore in various areas such as down payment assistance, donations of vacant land or homes, funding for land acquisition, and joint development of affordable housing projects.
- Several interviewed organizations emphasized the importance of utilizing partnerships to create down payment assistance programs that strengthen buyers' ability to compete with investors and cash buyers in the for-sale home market.
- One example highlighted by an interviewee is Neighborhood Housing Services Oklahoma (NHSOK), a regional CHDO and certified housing organization based in Oklahoma City. It partnered with local lenders during the COVID-19 pandemic to develop an in-house 80-20 loan product that provides 100% financing, covering both the down payment and closing costs. This product was designed to help buyers compete in a market with limited inventory and high competition from investors and cash buyers in the for-sale home market. Moore residents may also be eligible for this program through NHSOK. The program reflects a successful partnership model that could inform future down payment assistance strategies for Moore.

Funding Constraints

- Interviewees stated that limited and inconsistent funding is a significant barrier to sustaining affordable housing and housing services in Moore. While state-level funding has remained stable, federal support—especially HUD contracts and grants—has declined or been delayed, leaving many organizations operating with uncertainty or insufficient resources. Several service providers also rely heavily on HUD funding and only small annual contributions from cities in the region, including Moore, which contributes approximately \$5,000 to \$5,500 annually. Interviewees believed that this level of

support is insufficient to meet local needs. For example, the rental assistance program provided by one interviewed organization can currently support only four to five households per year, despite the Moore's average rent reaching \$1,200—double what most low-income residents can typically afford (\$600/month).

- Additionally, many interviewed organizations mentioned that fundraising remains one of the most time-consuming parts of the development process and continues to limit the capacity to produce affordable housing.
- Without increased local support or more flexible funding mechanisms for the housing-related service providers, Moore is most likely to face continued service gaps for residents at risk of housing instability.

Challenges in Fair Housing Services

- According to one interviewed organization, DOGE (Department of Government Efficiency) has recently shut down 27 to 28 private fair housing organizations nationwide. The organization also mentioned that due to current federal funding uncertainty, resources have nearly been depleted, and conditions have changed significantly over the past several months. Additional funding is needed to support direct outreach and education, as many low-income residents have limited internet access.
- While the Metropolitan Fair Housing Council (MFHC) serves the broader region, including Moore, there is no dedicated fair housing center based in the city. MFHC operates with limited resources, which constrains its ability to provide proactive outreach, education, and enforcement services at the local level. The City of Moore should consider increasing funding support to MFHC to enhance local service delivery, including community education, outreach, and complaint resolution.
- According to an interviewed organization, there is also a growing need for self-help assistance, mediation in tenant-landlord issues, and legal services for working individuals who do not qualify for traditional low-income housing-related assistance. Meeting this growing demand will require the development of new, sustainable funding sources, as current resources are insufficient to support service expansion. The City should consider assessing these unmet needs and exploring partnerships to expand services.

Overall Poverty and Housing Instability for Youth

- One of the stakeholders interviewed estimated that 10% to 15% of Moore's residents live in poverty and struggle to afford adequate housing.
- According to one interviewee, the larger Oklahoma City metro area, including Moore, has approximately 4,200 homeless youths, while there are fewer than 200 available shelter beds. As a result, many young people are left without safe or stable options for overnight shelter, leading some to engage in risky or harmful behavior, such as intentionally getting arrested or turning to unsafe situations (e.g., survival sex), in order to find a place to sleep. These circumstances increase the risk and incidence of crime and youth exploitation.
- One interviewee pointed out that the existing CDBG fund allocations for youth services in Moore are insufficient to meet the growing needs.

Aging Population and Housing Needs

- According to an organization that provides senior-related services, many seniors prefer aging in their own homes but face difficulty due to limited access to affordable housing options and supportive services.
- Additionally, the organization also mentioned that high demand exists for expanded public transportation options, especially rural routes within Moore and connections between Moore and Norman for senior residents.
- The Moore Curve project, which includes 148 units compliant with the Americans with Disabilities Act (ADA) accessibility standards, dedicates 35% to 40% of them to low-income households. It is one of the very few recent housing developments serving this demographic in Moore.

Limited Transportation Services

- Most of the interviewed organizations emphasized that limited public transportation options in Moore hinder access to critical services, particularly for elderly and disabled residents who rely on door-to-door transit for medical appointments and daily needs.
- One interviewee noted that Moore currently lacks dedicated transit services. In contrast, Norman received \$2 million in federal funding for a multi-modal transit project.
- As discussed in Section 5, although Moore was initially included in the Regional Transit Authority of Central Oklahoma (RTA) plans, the City chose to withdraw from the regional network in 2022 due to concerns about funding and resource allocation. However, local needs for expanded transit options persist.

B. PREVIOUS GOALS AND PROGRESS MADE

The previous AI identified nine impediments to fair housing in Moore. Almost all of the impediments identified in the 2020 Analysis of Impediments to Fair Housing (AI) remain relevant today. The previously identified impediments include:

- Lack of affordable housing organizations and partners,
- Limited housing types and affordable options, and the absence of transitional or homeless housing,
- Housing condition issues in certain neighborhoods,
- Limited access to resources and opportunities in publicly supported housing neighborhoods,
- Poverty and limited access to resources and opportunities for the Hispanic population,
- Limited supply of housing for persons with disabilities,
- Lack of public transportation infrastructure,
- Limited public funding and programs for affordable housing, and
- Need for increased fair housing education and for real estate and property management firms to incorporate fair housing language in listings.

Moreover, additional issues and challenges have been identified in this study, including:

- Barriers to obtaining home mortgage financing for some minority populations, and
- Need for zoning policy updates.

Therefore, the consolidated current impediments to fair housing choices in Moore include:

- Limited attainable housing options and location choices, coupled with limiting zoning policies.
- Limited attainable housing options for people with special needs and those experiencing homelessness.
- Housing condition issues in vulnerable neighborhoods.
- Limited organizational capacity, partnership, local funding, and housing programs.
- Limited access to resources and opportunities for minority populations and in publicly supported housing neighborhoods.
- Barriers to obtaining home mortgage financing for some minority populations in the private sector.
- Lack of public transportation infrastructure.
- Need for increased fair housing education, including in real estate listing and leasing practices.

C. IMPEDIMENTS AND RECOMMENDATIONS

1. Limited Attainable Housing Options and Location Choices, Coupled with Limiting Zoning Policies

As noted in the previous AI, the city's existing housing stock is largely composed of single-family homes, limiting options for a diverse range of housing needs, including smaller units, higher-density housing, and mixed-use developments that make attainable housing development more financially feasible. The LIHTC developments of Lyon Estates and the Curve are examples of this approach, though these two projects remain the only recent major additions to the city's affordable housing inventory. As discussed in Sections 3 and 5, only 28.7% of the rental units are affordable to households earning 50% of the Area Median Income (AMI), with very limited affordable rental options on the south and east sides of the city. In addition, the growth in median home value and median gross rent has outpaced the median household income increase between 2013 and 2023 in the city, reducing residents' ability to pay and overall housing affordability.

This is coupled with the fact that Moore's current zoning ordinance has not been updated since 2000, though the city's Comprehensive Plan, Envision Moore Plan 2040, which was adopted in 2017, recommends a zoning update. The existing zoning ordinance provides limited options and locations for diverse housing types, infill development, the missing middle housing, higher-density housing, or mixed-use developments. This highlights the need for the City to increase housing options across all housing types and price points throughout its neighborhoods.

Recommendations

One strategy is to conduct a comprehensive update to the zoning ordinance to align with the goals outlined in the Envision Moore Plan 2040, such as upzoning the R-4 district, expanding R-3 and R-4 districts, and expanding the options for mixed-use developments, as discussed in Section 5.

The City should also consider introducing additional policy and financial incentives as consistent programs to encourage the development of attainable housing options, such as land provisions, density bonuses, certain fee waivers, an expedited review process, and flexibility in terms of dimensional standards for projects with affordable unit components.

2. Limited Attainable Housing Options for People with Special Needs, the Elderly, and Those Experiencing Homelessness

Moore currently lacks dedicated resources and programs for people experiencing homelessness or economic crisis. The City does not receive HUD funding for special housing for the homeless population, and it has no temporary transitional housing program. According to an interviewed organization, the Oklahoma City metro area has roughly 4,200 homeless youths, while the three primary shelters in the region only have a combined capacity of fewer than 200 beds.

In addition, Moore has around 9,032 people with disabilities, with 43% of them being seniors aged 65 or above. Though not all of them are renters, the city only has around 233 publicly supported rental units (Langley Village Apartment, Forest Village Estate, and 148 accessible units from the Curve) for the elderly and people with disabilities, along with 266 households with disabilities and seniors currently living in Housing Choice Voucher units, with some of them overlapping with the 233 publicly supported rental units, totaling fewer than 500 attainable units. Also note that, as discussed in Section 4, people with disabilities are more likely to experience housing discrimination in Moore, as one of the most common reasons for fair housing complaints filed in Moore between 2021 and 2025 is discrimination based on disability status.

Recommendations

These data highlight a critical need for the City to expand its resources and housing stock by building a continuum of housing options for people at different stages of life with various needs. This requires the City to strengthen its existing collaboration and build new partnerships with local and regional service providers and housing-related stakeholders, which will be further discussed later.

3. Housing Condition Issues in Vulnerable Neighborhoods

As noted in the previous AI and highlighted during stakeholder interviews conducted for this study, the demand for housing repair assistance to address housing condition issues outpaces the capacity of local service providers. In addition, low- and moderate-income residents, especially the minority and Hispanic populations on the west and northwest sides of the city, are disproportionately affected by housing condition issues, as discussed in Section 3. These neighborhoods also have a larger presence of renters and attainable rental housing options, suggesting that housing condition issues disproportionately impact renters and the rental housing stock, further reducing safe and livable affordable rental options.

Recommendations

Addressing housing condition issues can help preserve existing housing affordability by preventing housing units from falling into dilapidation and uninhabitability, which is as important as increasing new attainable housing stock. The City should:

- Establish local funding dedicated to housing;
- Expand its housing repair and rehabilitation assistance program to provide additional benefits at a larger capacity using a place-based strategy, prioritizing low- and moderate-income minority neighborhoods on the west and northwest sides of the city;
- Expand its current housing repair program to include rehabilitation assistance for rental properties serving low- and moderate-income residents;
- Build partnerships with community organizations and service providers to proactively identify and reach out to owners of properties with condition issues, especially rental properties on the west and northwest sides of the city.

4. Limited Organizational Capacity, Partnership, Local Funding, and Housing Programs

As discussed earlier, Moore currently only receives CDBG funds from HUD, with limited dedicated local funding sources for housing. With the unpredictability in federal funding, as noted by interviewees, limitations in funding and housing programs provided by the City have remained a constraint since the last two AIs. In addition, as noted by both the 2015 and 2020 AIs, Moore does not have a public housing agency or authority to develop or administer publicly supported housing, and has limited presence of developers or organizations for attainable housing development and rehabilitation. One of the interviewees mentioned that “the Curve” LIHTC project is a good example of a successful public-private partnership. The City of Moore selected the developer through a national Request for Proposal and committed approximately \$16 million in HUD disaster recovery funding, in addition to providing the land. The interviewee noted that this level of local investment was instrumental in making the project financially viable.

Recommendations

The City should expand its capacity for developing and preserving attainable housing through:

- Establishing dedicated local funding for housing, such as a housing trust fund, housing bonds, community land bank, and community land trust;
- Increasing local housing assistance programs and resources, such as expanding its existing housing repair program as discussed earlier, and creating a homeownership assistance program via partnerships with local housing stakeholders and funding from local funding sources;
- Strengthening existing collaborations and creating new partnerships for attainable housing development and rehabilitation/preservation with local and regional major employers (e.g., health care system, schools, etc.), financial institutions, faith-based organizations, and experienced regional attainable housing developers.

5. Limited Access to Resources and Opportunities for Minority Populations and in Publicly Supported Housing Neighborhoods

As detailed in earlier sections, data shows that lower-opportunity areas overlap with minority- and Hispanic-concentrated communities and a cluster of publicly supported housing units, highlighting limited access to resources and opportunities for the minority populations and for publicly supported housing neighborhoods. This is especially true for areas on the west and northwest sides of the city.

Recommendations

The City should reduce barriers to fair housing choices for these populations through placed-based strategies to reduce the concentration of publicly supported units in lower-income areas, including:

- Increasing targeted investments in economic opportunities and community services and amenities on the west and northwest sides of Moore, such as child care, quality supermarkets, job training, employment assistance, financial literacy, entrepreneurship assistance, and local school quality;
- Preserving existing housing affordability in these communities, such as through housing rehabilitation, providing tenants' first right of refusal, and identifying expiring publicly supported housing developments and extending their affordability periods;
- Increasing attainable housing options in other parts of Moore, especially amenity-rich communities on the east and south sides of the city.

6. Barriers to Obtaining Home Mortgage Financing for Some Minority Populations

As previously discussed in Section 6, limited and higher-cost access to home purchase, improvement, and refinancing loans for the Hispanic and minority applicants has a significant impact on homeownership opportunities in addition to housing quality and financial stability, deepening existing wealth gaps. The lack of homeownership assistance programs in Moore has also added to the pressure faced by the most vulnerable applicants.

Recommendations

The City should:

- Create homeownership assistance program for the low- and moderate-income populations via partnership with the Metropolitan Fair Housing Council and other community organizations, with completing homeownership training courses with Metropolitan Fair Housing Council (MFHC) of Oklahoma as a prerequisite;
- Expand its collaboration with financial lending institutions and housing organizations such as the MFHC to advertise and promote existing financial literacy education and mortgage application assistance, in addition to providing additional multilingual assistance and services to target credit history and application completion issues among minority applicants, especially the Black, Hispanic, and Native American applicants, as well as applicants of Two or More or Some Other Races;
- Increase funding allocation to MFHC to support its homeownership preparedness and fair housing education efforts, such as high-cost lending awareness.

7. Lack of Public Transportation Infrastructure

As identified in both the 2015 and 2020 Analyses of Impediments to Fair Housing Choice, the City of Moore continues to lack a citywide public transportation system, creating barriers to fair access to healthcare, education, and employment opportunities, especially for low-income residents, seniors, people with disabilities, and those without reliable transportation.

While a few targeted services like senior transportation programs, paratransit services, and limited fixed-route bus stops exist, these options are limited to certain geographies, age groups, or disability statuses. The City's decision to withdraw from the Regional Transit Authority in 2022, though followed by ongoing feasibility studies of the micro transit program, reflects the challenge of addressing this long-standing barrier.

Recommendations

While the micro transit program is primarily intended to serve seniors and low-income residents, the City should make the service accessible for people with disabilities. In addition, the City should ensure that the micro transit program effectively connects low- to moderate-income residents to employment opportunities, amenities, and community resources.

8. Need for Increased Fair Housing Education, Including in Real Estate Listing and Leasing Practices

As discussed previously, additional fair housing education, services, and funding are needed to more effectively serve the city. It also appears that many of Moore's real estate brokerage firms do not display or promote information related to the Fair Housing Act. This finding is consistent with observations made in the previous AI. The National Association of Realtors requires that its members adhere to the following practices:

- Provide equal professional service without regard to the race, color, religion, gender (sex), disability (handicap), familial status, national origin, sexual orientation, or gender identity of any prospective client, customer, or of the residents of any community.
- Keep informed about fair housing law and practices, improving my clients' and customers' opportunities and my business.
- Develop advertising that indicates that everyone is welcome, and no one is excluded; expanding my clients and customers' opportunities to see, buy, or lease property.
- Inform clients and customers about their rights and responsibilities under the fair housing laws by providing brochures and other information.
- Document efforts to provide professional service, which will assist members in becoming more responsive and successful REALTORS.
- Refuse to tolerate non-compliance.
- Learn about those who are different from me and celebrate those differences.
- Take a positive approach to fair housing practices and aspire to follow the spirit as well as the letter of the law.
- Develop and implement fair housing practices for my firm to carry out the spirit of this declaration.

Recommendations

The City, in cooperation with the Metropolitan Fair Housing Council (MFHC) of Oklahoma, should:

- Maintain active relationships with local realtors and property management firms and provide biannual or annual outreach and training to help raise fair housing awareness and integrate fair housing resources into their marketing and listings.
- Provide additional funding to MFHC for direct fair housing education and outreach, including tenant rights, as many low-income residents lack internet access and other resources, through local dedicated funding sources such as the housing trust fund.
- Increase support for self-help services, mediation, and legal services to assist the “working poor” who do not qualify for traditional low-income benefits.