

# ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE



**CLARKSVILLE**  
TENNESSEE'S TOP SPOT

FEBRUARY 2012

PREPARED BY

THE CLARKSVILLE OFFICE OF HOUSING  
AND COMMUNITY DEVELOPMENT

With the assistance of

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# 1) INTRODUCTION

## PURPOSE OF REPORT

The Fair Housing Act of 1968 states that it is the policy of the United States to provide for fair housing throughout the country and the Act prohibits any person from discriminating in the sale or rental of housing, the financing of housing, or the provision of brokerage services, including or otherwise making unavailable or denying a dwelling to any person because of race, color, religion, sex, national origin, handicap, or familial status. The State of Tennessee echoes such goal and has also adopted legislation protecting equal access to housing.

Nationally, fair housing and impediments to fair housing are monitored by the United States Department of Housing and Urban Development (HUD) through the use of Community Block Development Grant (CDBG) funding for fair housing advocacy groups. This role of HUD to act as an administrator of fair housing programs originated in 1968 with the passage of the Civil Rights Act, described below. As a qualified entitlement jurisdiction, the City of Clarksville also receives HOME Investment Partnership Program (HOME) funds from HUD.

Each grantee which receives CDBG funding under Title I of the Housing and Community Development Act is required to further fair housing and fair housing planning by conducting an analysis to identify impediments to fair housing choice within those cities/communities within its jurisdiction. The grantee will also take appropriate actions to overcome the effects of any impediments identified and will maintain records which reflect the analysis and actions taken in this regard.

The City of Clarksville Office of Housing and Community Development (OHCD) has developed the following Mission Statement:

*MISSION STATEMENT:* The Mission of the City of Clarksville Office of Housing and Community Development is to bring needs and resources together in a coordinated housing and community development strategy to create, maintain and expand decent housing, suitable living environment and economic opportunities for low and moderate income persons in the City.

The City of Clarksville has consistently supported the concept of the provision of fair housing for its residents without regard to race, color, religion, sex, national origin, handicap, or familial status. To that end, the City has consistently used a portion of its CDBG funding to support programs of fair housing services for low and moderate income households. The fundamental fair housing goal is to make housing choice a reality through fair housing planning, which includes the following:

- Preparing an Analysis of Impediments to Fair Housing Choice (AI);
- Acting to eliminate identified impediments; and
- Providing fair housing records.

The purpose of this AI is to provide essential, specific, and detailed information and data to municipal officials and staff, policy makers, housing developers, lenders, and fair housing advocates. The AI helps build public support for fair housing efforts. This report represents Clarksville's efforts in making an objective assessment of the nature and extent of fair housing concerns in the City, and the potential impediments to making fair housing choice available to its residents.

The City's last AI was completed in 2006. This new AI considers the significant changes that have occurred since the development of the previous AI including the effects of population growth, an increasing diverse population, economic change with regard to jobs and the housing market, and the continued need for awareness, education and outreach about fair housing.

## **DEFINING FAIR HOUSING**

### ***Federal Laws***

The federal Fair Housing Act of 1968 and Fair Housing Amendments Act of 1988 (42 U.S. Code §§ 3601-3619, 3631) are federal fair housing laws that prohibit discrimination in all aspects of housing, such as the sale, rental, lease or negotiation for real property. The Fair Housing Act prohibits discrimination based on race, religion, and national origin. In 1988, the Fair Housing Act was amended to extend protection to familial status and people with disabilities (mental or physical). In addition, the Amendment Act provides for "reasonable accommodations", allowing structural modifications for persons with disabilities if requested, at their own expense, and sets housing code standards for new multi-family dwellings to accommodate the physically disabled.

Discrimination against Families with Children and Persons with Disabilities are further defined:

### ***Discrimination against Families with Children***

Familial Status (often called "families with children") refers to a parent or another person having legal custody of one or more individuals under the age of 18 years. It refers also to a person who is pregnant or in the process of getting legal custody of a minor child. Families with children enjoy under the law the same protection against housing discrimination as other groups protected by the law. In only two instances, does the law permit, as exceptions, discrimination against families with children. Both exceptions pertain to so-called housing for older persons. Housing intended for and occupied solely by people 62 years of age or older and housing in which 80 percent of the units are intended for and occupied by at least one person who is 55 years of age or older do not need to comply with the law's familial status provisions. Discrimination against families with children manifests itself in many ways, the most common of which are in advertising (e.g. indications that rentals are for "no children" or "adults only"), restrictive occupancy standards that unreasonably limit the number of children who may occupy a given space, and steering of families with children to separate buildings or parts of buildings.

### ***Provisions for People with Disabilities***

The Fair Housing Act defines "handicap" (or disability) as:

1. a physical or mental impairment which substantially limits one or more of such person's major life activities,
2. a record of having such an impairment, or
3. being regarded as having such an impairment, but such term does not include current, illegal use of or addiction to a controlled substance.

### ***Special Protections***

In addition to providing people with disabilities all of the protections against housing discrimination that are provided to members of the other six protected classes, the following provisions of the Fair Housing Act provide important additional protection.

The prohibition against discriminating in the terms and conditions of sale or rental prohibits a landlord from asking any questions of a person with a disability than would be asked of any other applicant. A landlord may not, for example, inquire about the nature or severity of a person's disability or ask whether that person is capable of living alone.

### ***Reasonable Accommodations***

It is unlawful to refuse to make such reasonable changes in rules, policies, practices and services, which may be necessary to afford a person with a disability an equal opportunity to enjoy and use a dwelling. These "reasonable accommodations" include such things as making an exception to a "no pets" policy for a person who needs a service animal and providing a reserved, designated parking place for a person with mobility impairment.

### ***Reasonable Modifications***

It is unlawful to refuse to permit a person with a disability to make, at his/her own expense, such reasonable changes in the premises as may be necessary to permit use and enjoyment of the premises. "Reasonable modifications" include such things as installing grab bars to facilitate use of bathroom facilities, cabinets lowered or the widening of a doorway to accommodate a wheelchair.

### ***Full Accessibility of "New" Multi-family Housing***

Multi-family housing constructed for first occupancy after March 13, 1991 (i.e. buildings consisting of 4 or more units) must be fully accessible to people with disabilities. If a building has an elevator, all units must be accessible; if there is no elevator, only "ground floor" units must be accessible. "Accessible" means: 1) There must be an accessible building entrance on an accessible route; 2) Public and common use areas must be readily accessible to and usable by people with disabilities; 3) All inside doors must be wide enough to accommodate a wheelchair; 4) There must be an accessible route into and through the dwelling; 5) Light switches, electrical outlets, thermostats and other environmental controls must be accessible; 6) Bathroom walls must be reinforced to allow later installation of grab bars; and 7) Kitchens and bathrooms must have enough space to permit maneuvering in a wheelchair.

Three significant changes to the Fair Housing Act were made. These changes are described briefly as follows:

- The Housing for Older People Act of 1995 (HOPA) made several changes to the 55 and older exemption. Since the 1988 Amendments, the Fair Housing Act has exempted from its familial status provisions properties that satisfy the Act's 55 and older housing condition. First, HOPA eliminated the requirement that 55 and older housing have "significant facilities and services" designed for the elderly. Second, HOPA establishes protection from damages for persons who in good faith believe that the 55 and older exemption applies to a particular property, if they do not actually know that the property is not eligible for the exemption and if the property has formally stated in writing that it qualifies for the exemption.
- Changes were made in the Act to enhance law enforcement, including making amendments to criminal penalties in section 901 of the Civil Rights Act of 1968 for violating the Fair Housing Act.
- Changes were made to provide incentives for self-testing by lenders for discrimination under the Fair Housing Act and the Equal Credit Opportunity Act. See Title II, subtitle D of the Omnibus Consolidated Appropriations Act, 1997, P.L. 104 - 208 (9/30/96)1. In addition, it is also illegal for anyone to threaten, coerce, intimidate or interfere with anyone exercising a fair housing right or assisting others who exercise that right and advertise or make any statement that indicates a limitation or preference based on race, color, religion, national origin, familial status or handicap. Both intentional discrimination and unintentional actions or conditions that limit choice are also prohibited.

### ***Tennessee Laws***

It is the policy of the State of Tennessee to provide, within constitutional limitations, for fair housing throughout the state. The Tennessee Fair Housing Law is found at [Tenn. Code Ann. §§ 4-21-601 4-21-607](#). This act provides for fair housing based on race, color, creed, religion, sex, handicap, familial status or national origin. In addition, the Tennessee Uniform Residential Landlord and Tenant Act (T.C.A. Section 64-2801) addresses relations between landlord and tenant with the objective of (1) Simplifying, clarifying, modernizing and revising the law governing the rental of dwelling units and the rights and obligations of landlord and tenant; (2) encouraging landlord and tenant to maintain and improve the quality of housing; (3) promoting equal protection to all parties; and (4) making uniform the law in Tennessee. The statute has a number of exemptions and applies to municipalities with a population of over 68,000.

The entity with primary responsibility for addressing Fair Housing issues in the state is the Tennessee Fair Housing Council. This organization is a private, non-profit advocacy organization whose mission is to eliminate housing discrimination throughout Tennessee. Its enforcement program is based in Nashville and concentrates on Davidson, Cheatham, Dickson, Rutherford, Sumner, Williamson and Wilson counties. The Council provides education and advocacy on housing discrimination, and also takes complaints from individuals who believe they are experiencing or have experienced discrimination. Work with individual clients sometimes involves negotiating disability-related accommodations

with landlords, and on some occasions the Council provides legal representation to individuals who wish to file an administrative complaint or lawsuit.

### ***Clarksville Ordinance***

The City of Clarksville has had a Fair Housing and Equal Opportunity Ordinance in effect since 1986. The City does not currently have a fair housing agency, local contact person or investigative agency to assist persons who feel that their rights have been violated. The Legal Aid Society of Middle Tennessee and the Cumberland handles complaints filed in the City.

However, it should be noted that the City's Human Relations Commission is preparing to assume the duties associated with handling housing discrimination issues. Members of the Commission are learning about fair housing laws and policies, developing policies and procedures, as well as appropriate contacts, to address complaints and problems in this area.

### ***Fair Housing Defined***

In light of the various pieces of fair housing legislation passed at the federal and state levels, fair housing throughout this report is defined as follows:

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

### ***Impediments Defined***

Within the legal framework of federal and state laws and based on the guidance provided by the U.S. Department of Housing and Urban Development (HUD) Fair Housing Planning Guide, impediments to fair housing choice are defined as:

*Any actions, omissions, or decisions taken because of race, color, ancestry, national origin, religion, sex, disability, marital status, familial status, source of income, sexual orientation, or any other arbitrary factor which restrict housing choices or the availability of housing choices; or*

*Any actions, omissions, or decisions which have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, ancestry, national origin, religion, sex, disability, marital status, familial status, source of income, sexual orientation.*

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

### ***Fair Housing and Affordable Housing***

When talking about “fair housing” and “affordable housing” the two phrases are often used interchangeably. The concepts are distinct, but intertwined. However, it is important to distinguish between the two in order to clearly identify issues and reduce fair housing discrimination. The phrase “fair housing,” in the context of preparation of an Analysis of Impediments to Fair Housing Choice (AI), refers to persons (families, seniors, individuals, and special needs populations) who are members of protected classes, as specified by federal statutes. It is illegal to discriminate against person on the basis of their membership in a protected class in the sale, rental, financing, and insuring of housing. On the other hand, “affordable housing” generally refers to the ability of households to afford, based on income, to buy or rent housing. Specifically, most federal, state, and local funding programs to support the increase in the supply of affordable ownership and rental housing are targeted to low- and moderate-income households. Low-income households are defined by most of those publicly funded programs as earning less than 50 percent of the HUD determined area median income (AMI), with moderate-income households earning 50 to 80 percent of the AMI. In certain instances, affordable housing programs address households with greater incomes. The recently adopted Neighborhood Stabilization Program, for example, which focuses on foreclosed housing, has an income limit set at 120% AMI.

Because the two concepts are different, tools to address fair housing are distinguished from tools to increase the supply of affordable housing. One difference is that issues of discrimination regarding fair housing can apply to all income levels, because protected classes are represented in all income groups.

Clearly, there are many actions that can and should be taken that are directly aimed at elimination of discrimination against federally and locally protected groups in the selling, renting, financing, and insuring of housing, as recommended in this AI report. Those actions include: education of prospective homebuyers and tenants as to their rights to access to housing; and, enhancement of the system to study, receive complaints, investigate complaints, resolve complaints, and/or bring charges and prosecute violations of federal and local fair housing laws. While robust implementation of these actions will decrease discrimination in housing, it is not likely that such actions taken alone will eliminate housing discrimination.

Yet it is difficult to talk about addressing impediments to fair housing, and actions to eliminate discrimination in housing, without simultaneously talking about development of policies, plans, programs, and projects to increase the supply of affordable housing. Discrimination in housing will, in part, be reduced by the provision of housing opportunities and choices made affordable to all income groups in all communities, especially low- and moderate-income households.

Certain protected classes have disproportionate representation in the numbers of low- and moderate-income households in Clarksville, and so it is reasonable to expect that as the supply of affordable housing is increased in all communities of the City, greater numbers of protected class members will have access to housing without discrimination.

## **SCOPE OF ANALYSIS**

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

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

### ***Geographic Area Covered***

This report constitutes the AI for the City of Clarksville.

## **DATA AND METHODOLOGY**

The following are key data sources used to complete this AI:

- 2010 U.S. Census and the 2005-2009 American Community Survey
- The City's Consolidated Plan, 2010-2015 and the 2011 CAPER
- Comprehensive Housing Affordability Strategy (CHAS) Data from HUD
- Housing Authority Plans
- U.S. Department of Housing and Urban Development (HUD)
- Home Mortgage Disclosure Act (HMDA) Data
- RealtyTrac and Trulia Housing Sales and Foreclosure Data
- U.S. Department of Housing and Urban Development (HUD), Fair Housing and Equal Opportunity Complaint Data
- The City of Clarksville 2006 Analysis of Impediments to Fair Housing Choice
- Housing Element of the Clarksville-Montgomery County Land Use Plan Update

Sources of specific information are identified in the text, tables and figures.

## **ORGANIZATION OF THE REPORT**

The AI is divided into nine (9) chapters:

1. Introduction: Defines "fair housing" and explains the purpose of the report.
2. Community Participation: Describes the community outreach program.
3. Community Profile: Presents the demographic, housing, and income characteristics in the City of Clarksville
4. Fair Housing Practices: Identifies and explains the oversight of fair housing by both government and industry organizations

5. Lending and Complaint Data, Advertising: Assesses the nature and extent of fair housing complaints and violations, examines loan data and lending practices, and evaluates advertising
6. Public Policies and Practices: Analyzes public policies and actions that may impede fair housing within the City
7. Resident Survey and Focus Group Meetings: Analyzes results of the resident surveys and the focus group meetings
8. Fair Housing Accomplishments: Describes recent activities and accomplishments related to Fair Housing
9. Identified Impediments, Recommendations, and Action Plan: Describes the Impediments to Fair Housing Choice and summarizes AI findings regarding fair housing issues; provides recommendations for furthering fair housing choice and describes actions for implementation.

## 2) COMMUNITY PARTICIPATION

As with the development of the Consolidated Plan, this Analysis of Impediments to Fair Housing Choice (AI) results from a process of consultation and citizen participation, building upon existing participation mechanisms and venues. Citizens, not-for-profit organizations, and interested parties were afforded a variety of opportunities to:

- contribute during meetings, hearings and planning sessions,
- review and comment upon the participation plan, the Analysis of Impediments, and comments made about the Analysis,
- participate in public hearings,
- comment upon the plan and its amendments, and
- register complaints about the Analysis and its amendments.

The City complied with the citizen participation requirements of the regulations by doing the following:

- Preparing, adopting, and following a Citizen Participation Plan;
- Publishing informational notices about the document prior to public hearings;
- Holding public hearings in accessible places at convenient times after providing reasonable notice;
- Publishing a summary of the Analysis, describing its contents and purpose and a listing of locations where the entire document could be examined;
- Making the Analysis available for public examination and comment for a period of thirty (30) days before submission to HUD;
- Providing citizens, public agencies, and other interested parties reasonable access to records regarding uses of assistance for affordable and supportive housing the City may have received during the preceding five years; and
- Considering the views and comments of citizens, and preparing a summary of those views for consideration with the submission.

The Office of Housing and Community Development staff conducted a well publicized, evening public meeting at the Public Library. In addition, the Office conducted four focus group meetings, inviting members of the Human Relations Commission, representatives from lending and financial services organizations, community service organizations, housing developers, and housing advocacy groups. A survey was completed by each attendee at the focus group meetings and was made available to City residents on the City Website. The availability of the survey was noted not only on the Website, but through a press release and PSA.

A public hearing to review the Analysis of Impediments was held on Thursday, February 2, 2012, following appropriate public notice, a copy of which appears in Appendix C. This meeting was held in the City Council Chambers. This meeting reviewed the basic elements of the AI. The floor was opened for comments and questions. At this meeting the City Council approved and executed the Analysis of Impediments to Fair Housing Choice and Resolution of Authorization.

### **3) COMMUNITY PROFILE**

Fair housing is concerned with ensuring that: 1) all people are treated equally in the rental, sale, or occupancy of housing; and 2) a range in types and prices of housing is available. This chapter examines the population, housing, and special needs characteristics and trends in the City that may affect equal housing opportunity.

This Community Profile provides insights for identifying potential impediments to fair housing choice. While not definitive indicators of impediments to fair housing choice in and of themselves, these data may point to conditions or situations that could be indicators of impediments to fair housing choice. Observations about issues that **could** arise are made at the end of this section.

#### **OVERVIEW**

The City of Clarksville is located in the northwestern quadrant of the State of Tennessee on the Red River. The City, the fifth largest municipality in the State, is located 45 miles northwest of the State capital, Nashville, and is the core of the Clarksville-Hopkinsville Metropolitan Statistical Area, as well as the County seat of Montgomery County. Surrounded by active farms and timberlands, Clarksville is the commercial, educational, and transportation center of the region.

The City encompasses 105 square miles and is home to Austin Peay State University, which has over 10,000 students, and is a gateway to the 105,000-acre Fort Campbell military base, which has a post population of over 35,000 personnel. The effects of the recent recession were mitigated by the presence of Fort Campbell and the City's strong economy. The City has actively sought industrial investment and has experienced job growth, in particular breaking ground and initiating training programs for a new solar panel manufacturing facility.

#### **DEMOGRAPHICS**

##### ***Population***

The population of the City now estimated to be 132,929 persons according to the 2010 American Community Survey (ACS). This is a twenty-eight percent increase from the 103,766 persons in the 2000 census, and an increase of 57,435 from the 1990 population.

Clarksville has a relatively younger population. The median age according to the 2010 ACS was 28.6 years. This compares to 37.2 for the United States and 38.0 for the State. In Clarksville 7.3 percent of the population is over 65, while in Tennessee, the percentage is 13.4, and the United State percentage is 13.0. The low median age is affected by the presence of the educational institutions in the City and the presence of Fort Campbell and its younger population. The table below compares Clarksville's population with those of the State and the nation by age cohort, clearly showing the larger percentage of persons in the City under 40 and the much smaller percentages of older persons.

<b>Population by Age - Clarksville - TN - US</b>			
<b>Age Cohort</b>	<b>Clarksville %</b>	<b>TN %</b>	<b>US %</b>
<5 Years	9.6	6.4	6.5
5 - 9	7.9	6.5	6.6
10-14	6.9	6.6	6.7
15-19	7.2	6.9	7.1
20-24	10.5	6.7	7.0
25-29	10.7	6.6	6.8
30-34	8.1	6.4	6.5
35-39	6.9	6.7	6.5
40-44	6.0	6.8	6.8
45-49	5.9	7.4	7.4
50-54	5.3	7.2	7.2
55-59	4.1	6.5	6.4
60-64	3.4	5.8	5.4
65-69	2.4	4.4	4.0
70-74	1.9	3.3	3.0
75-79	1.4	2.4	2.4
80-84	0.9	1.8	1.9
>85	0.7	1.6	1.8

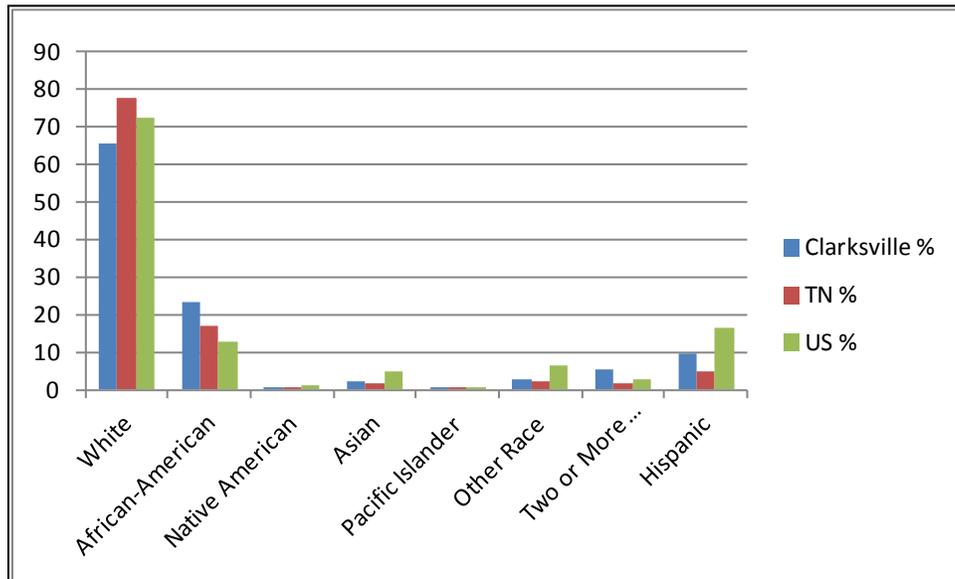
Source: 2010 ACS

It is also interesting to note that 51.3 percent of persons in the City are female, a figure above the national average of 50.8 though even with the State's 51.3 percent. As will be seen below, both age and gender considerations affect the size and types of households, and housing needs and requirements, as well as shaping the types of services the residents need.

### ***Race***

The graph below compares the racial composition of Clarksville with that of Tennessee and the United States, demonstrating significant racial diversity in the City. As can be seen, Clarksville has a smaller percentage of White persons than either the State or the nation. The percentage of African-Americans is appreciably higher than that of the State and the US; indeed, this percentage is almost twice that of the nation. Other racial groups are present in significant percentages, especially Two or More Races. The percentage of Asian persons is below the national figure, but well above the State figure. The percentage of Hispanic residents is twice that of Tennessee, though below the national figure.

## RACIAL COMPOSITION: CLARKSVILLE, TENNESSEE, & THE UNITED STATES 2010



*Source: 2010 ACS*

The table below presents these figures and compares them with the percentages by Race for the City in 2000.

<b>% of Population by Race - Clarksville - TN - US</b>				
<b>Race</b>	<b>2000 Clarksville %</b>	<b>2010 Clarksville %</b>	<b>TN %</b>	<b>US %</b>
White	68.0	65.6	77.6	72.4
African-American	22.8	23.2	16.7	12.6
Native American	0.5	0.6	0.3	0.9
Asian	2.2	2.3	1.4	4.8
Pacific Islander	0.3	0.5	0.1	0.2
Other Race	2.6	2.8	2.2	6.2
Two or More Races	3.7	5.1	1.7	2.9
Hispanic	6.2	9.3	4.6	16.3

*Source: ACS, 2010*

In the last decade the White population has declined modestly and the African-American population has increased slightly. The most significant change appears in the percentage of persons classifying themselves as Two or More Races. It should be noted that the percentage of persons calling themselves Hispanic increased by fifty percent over the decade.

Other population characteristics impact housing issues as well. The percentage of foreign-born persons in Clarksville is 5.9 percent, which is above the State figure of 4.5 percent, and well below the national percentage, 12.9 percent. Figures for persons speaking a language other than English at home are not yet available for Clarksville.

The list of Census Tracts on the following page shows concentrations of minority groups. The HUD definition of an area of minority concentration as a census tract in which the population of any racial/ethnic minority group exceeds 50% of the total population of that tract. A high concentration is defined as a census tract in which the population of any racial/ethnic minority group is 75% or more of the total population of that tract. Based on these criteria, and using the 2010 data, there are only four Census Tracts with any minority concentration, and only one tract in which there is a concentration of African-Americans. There are no Census Tracts with a high concentration of any minority group and no Tract with a high minority concentration. The N/A entries indicate that the number of minority persons is not significant enough to generate a meaningful percentage.

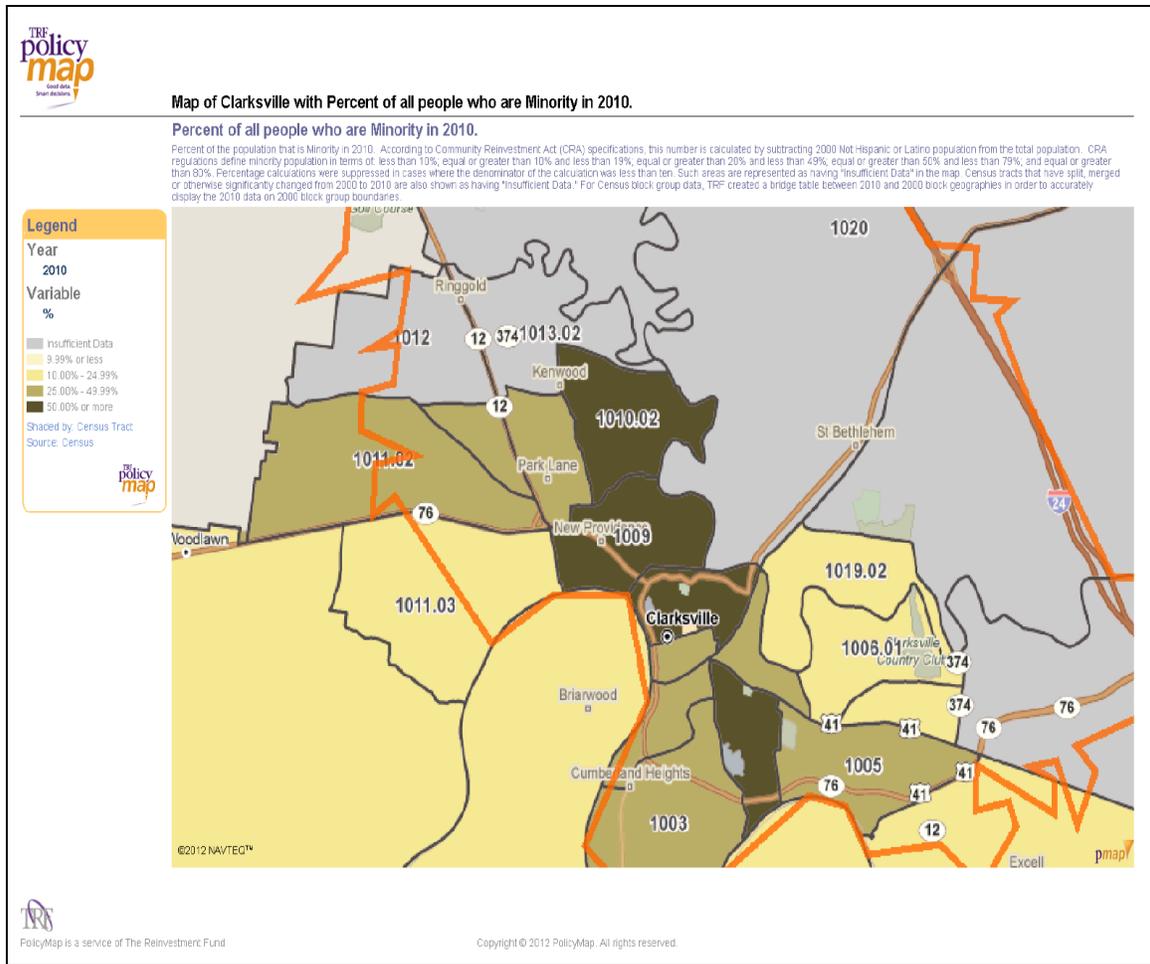
**CLARKSVILLE MINORITY PERCENTAGES BY CENSUS TRACT, 2010**

US Census Tract	Percent of all people who are <b>Minority</b> in 2010.	Percent of all people who are <b>African American</b> in 2010.	Percent of all people who are <b>Other Minority</b> in 2010
100100, Montgomery County	38.07	28.78	9.29
100200, Montgomery County	27.25	18.26	8.99
100300, Montgomery County	31.7	21.85	9.85
100400, Montgomery County	58.51	47.44	11.07
100500, Montgomery County	26.92	16.13	10.79
100601, Montgomery County	12.31	5.04	7.27
100602, Montgomery County	14.42	6.73	7.69
100700, Montgomery County	40.88	33.79	7.09
100800, Montgomery County	61.05	53.21	7.84
100900, Montgomery County	59.66	36.15	23.51
101001, Montgomery County	41.89	23.5	18.39
101002, Montgomery County	50.4	33.72	16.68
101101, Montgomery County	44.86	23.3	21.56
101200, Montgomery County	N/A	N/A	N/A
101301, Montgomery County	N/A	N/A	N/A
101302, Montgomery County	N/A	N/A	N/A
101902, Montgomery County	17.05	9.78	7.27
102000, Montgomery County	N/A	N/A	N/A

*Source: Policy Map and ACS, 2010*

The map below shows the percentage of minority residents in Clarksville by Census Tract. Minority populations are concentrated in the southern and western areas of the City. The grey areas in the north and west do not have a significant number of minority persons.

Copies of this map and the others in this document are included, in a larger format, are found in Appendix D.



Source: Policy Map and ACS, 2010

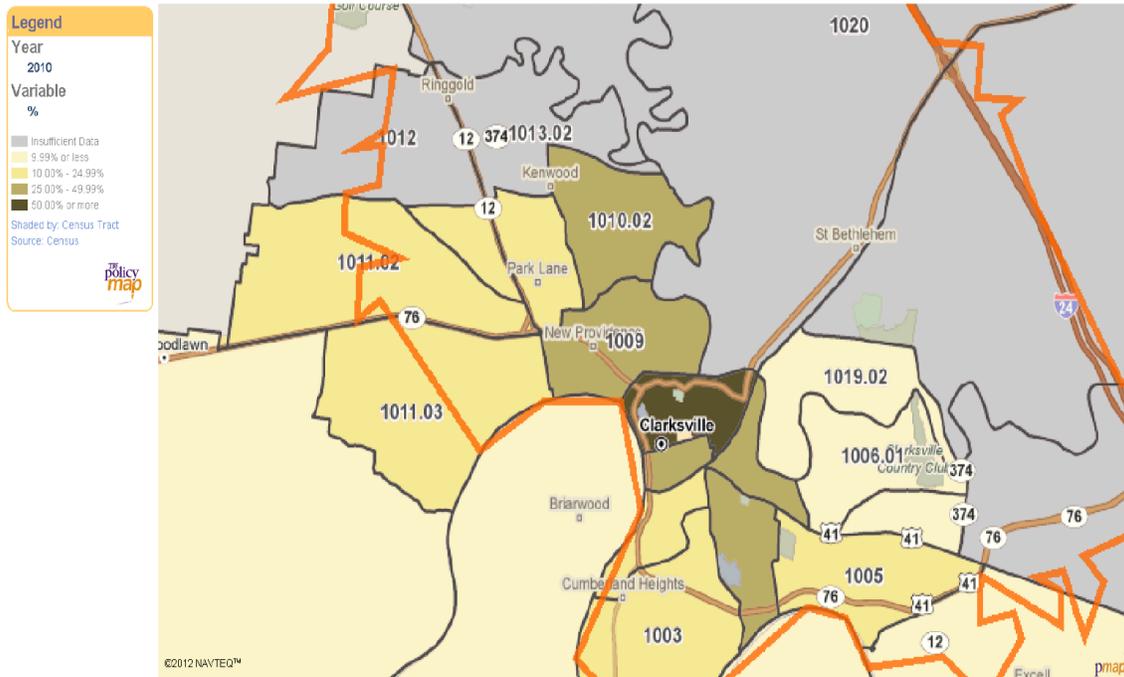
The map below shows the percentage of African-Americans in each Census Tract. Only one Census Tract, 1008, is more than 50 percent African-American, and no Tract has over 75 percent



### Map of Clarksville with Percent of all people who are African American in 2010.

#### Percent of all people who are African American in 2010.

Percent of the population that is Black or African American, by single classification of Census race, in 2010. Percentage calculations were suppressed in cases where the denominator of the calculation was less than 10 of the unit that is being described (e.g., households, people, householders, etc.). Such areas are represented as having "Insufficient Data" in the map. Denominators for percentage calculations were created by summing all of the component data items in a particular dataset. Census tracts that have split, merged or otherwise significantly changed from 2000 to 2010 are also shown as having "Insufficient Data." For Census block group data, TRF created a bridge table between 2010 and 2000 block geographies in order to accurately display the 2010 data on 2000 block group boundaries.

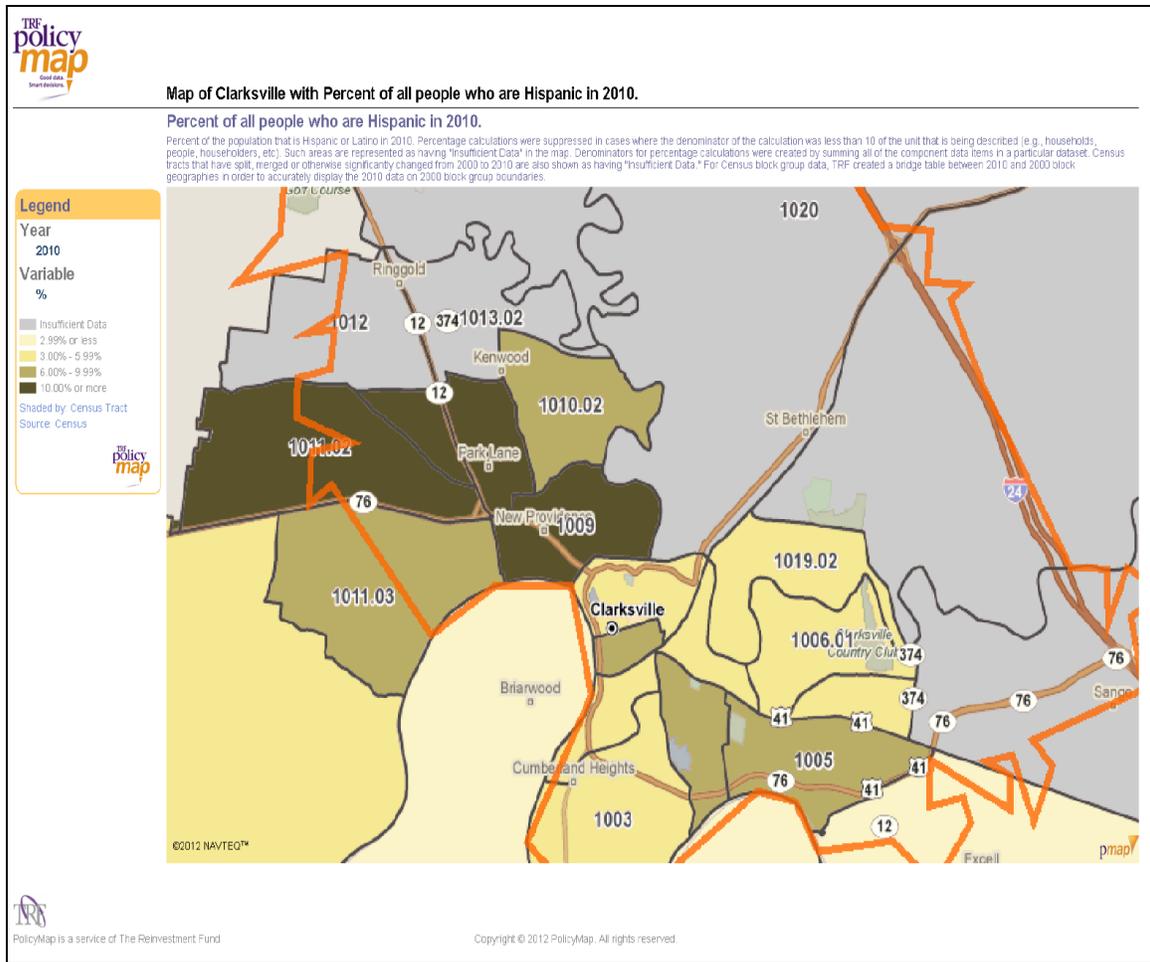


PolicyMap is a service of The Reinvestment Fund

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Source: Policy Map and ACS, 2010

As noted earlier, the Hispanic population has grown significantly in the past decade. In 2000, this population was concentrated in the north and northwestern parts of town. By 2010 the Hispanic population constituted over 10 percent of the population in the Census Tracts on the southern and western parts of the City, though no Tract was over 25 percent Hispanic, as the map below shows.



Source: Policy Map and ACS, 2010

The City of Clarksville is racially and ethnically diverse. Though minority populations are concentrated in Census Tracts 1008, 1009, 1010.02 and 1004, it should be noted that only one Tract, 1008, has a concentration of over 50.0 percent African-American and no Tract has a high concentration of any minority. Thus, the population is relatively homogeneous.

### ***Families and Households***

The average household size in Clarksville, 2.77 persons, is above both the US figure of 2.63, and Tennessee's 2.54. The percentage of Family Households in Clarksville is 72.1 percent, well above the US average of 66.4 percent, and the percentage of families with children under 18, is 39.4 percent, which is ten percent higher than either the State or the national figure. Conversely, the percentage of Clarksville households in which there is one or more persons over 65 is only 14.6 percent, a figure ten percent less than that of either the State or the US. Thus, the City has a significant number of families that are somewhat larger than the average family. Though there are many persons living alone,

the City's percentage of householders living alone is slightly below the national average. The table below presents this data.

**AVERAGE HOUSEHOLD AND FAMILY SIZE AND OTHER HOUSEHOLD CHARACTERISTICS  
CLARKSVILLE, TENNESSEE, AND THE UNITED STATES - 2010 ACS**

	Clarksville	Tennessee	United States
Average Household Size	2.77	2.54	2.63
Average Family Size	3.17	3.1	3.23
% Households with Persons 65 or Older	14.6%	25.0%	24.8%
% Householders Living Alone	23.5%	27.7%	27.4%

*Source: ACS, 2010*

***Disabled Persons and Special Needs Populations***

The 2010 figures for disability indicate that 11.3 percent of the City's population has some disability. This represents 14,297 persons. This percentage is slightly below the national figure of 11.9 percent. While only 4.5 percent of persons under 18 years have a disability, the Census reports that 43.7 percent of persons over 65 (4,310 people) are disabled. Information about specific types of disability is not available.

The Elderly and Frail Elderly

The elderly, 65 and over, constituted 7.3 percent of the total population in City of Clarksville in the 2010 ACS. The Frail Elderly, those 75 and over, may need additional assistance to live independently and have additional requirements for their housing, such as elevators, grab bars in the bathroom, and special types of kitchen and bathroom fixtures. There are an estimated 4,033 frail elderly in Clarksville.

The elderly, especially in very low-income households, face housing difficulties based upon their particular housing needs (size of units, and types of fixtures and amenities), and on the basis of the cost burden they bear for housing and the fact that most are limited by fixed incomes.

Persons with Physical Disabilities

The number of with any type of disability is estimated to be over 14,297 according to the 2010 ACS. Persons with physical disabilities may require assistance with daily living, and additional requirements for their housing including, for example, special types of kitchen and bathroom fixtures or special fire alarms.

The Developmentally Disabled

The Association for Retarded Citizens (ARC) indicates that the base definition of developmentally disabled is an IQ score less than 70. ARC indicates that the nationally accepted percentage of the population that can be categorized as developmentally disabled is two and one-half to three percent of the population. By this calculation, there are an estimated 3,988 developmentally disabled persons in Clarksville.

The preferred housing options for the developmentally disabled are those that present a choice and integrate them into the community. This includes supervised apartments, supported living, a skill development home, and family care homes.

The implications for fair housing issues are that there is a need for smaller housing units for the elderly and those living alone, but the demand is likely to be less relative to national percentages. Similarly, there is a need for housing for the frail elderly and the disabled, but the City’s population percentages would indicate a lower demand for the housing designed for these persons.

**ECONOMIC FACTORS**

***Educational Attainment***

Clarksville’s population has a high percentage of persons whose highest level of education is a high school diploma, and lower percentages of persons with college and advanced degrees. The percentage of persons with Associate degrees or Some College is higher than either State or US percentages, while the percentage of persons with less than a ninth grade education or no high school diploma is half that of the State.

**EDUCATIONAL ATTAINMENT (POPULATION 25 AND OVER)  
CLARKSVILLE, TENNESSEE, AND THE UNITED STATES - 2010ACS**

	Clarksville #	Clarksville %	TN %	US %
< Ninth Grade	2,365	3.1	6.2	6.1
9th to 12th grade, no diploma	4,232	5.6	10.1	8.3
HS Grad	24,949	33.0	33.5	28.5
Some College, no diploma	20,930	27.7	20.8	21.3
Associate Degree	5,871	7.8	6.2	7.6
Bachelor's Degree	12,196	16.1	14.6	17.7
Graduate Degree	5,031	6.7	8.5	10.4

*Source: ACS, 2010*

***Labor Force and Employment***

The labor force (persons 16 years and over) in Clarksville was 98,153 in 2010, a significant increase from the 54,680 figure in 2000. These persons represented 65.4 percent of the working age population, a labor force participation rate that is one percent higher than the US figure and four percent above the State figure of 61.6 percent.

The following table compares the employment by industry of Clarksville’s workers with those at the state and national level.

**PERCENTAGE OF WORKERS BY INDUSTRY  
CLARKSVILLE, TENNESSEE, AND THE UNITED STATES – 2010 ACS**

Industry	Clarksville %	TN %	US %
Agriculture, Mining, Forestry	0.0	1.1	1.9
Construction	4.2	6.8	6.2
Manufacturing	12.0	12.5	10.4
Wholesale	2.1	2.8	2.8
Retail	15.1	12.3	11.7
Transportation, Warehousing	5.9	6.0	4.9
Information	1.4	2.0	2.2
Finance, Insurance, Real Estate	5.2	5.7	6.7
Professional, Scientific and Mgmt	10.1	9.2	10.6
Education and Health Care	22.4	23.1	23.2
Art, Entertainment, Accommodation and Food Service	9.8	8.9	9.2
Other Services	2.8	4.9	5.0
Public Administration	9.0	4.7	5.2

*Source: ACS, 2010*

These figures are interesting in several respects. The percentage of construction workers belies the City’s relatively strong housing construction activity. The somewhat lower percentage of Education and Health Care workers is at odds with the presence of the University and regional medical facilities. However, the strong Retail Trade and Accommodation and Food Service employment reflects a strong demand for these services, though these two sectors are among the lower paying industries. The strong Public Administration is due in large measure to the City’s serving as the county seat, and the location of various federal government agencies.

Clarksville has fewer management and professional workers (in terms of percent of the work force) than the nation, but has a greater percentage of percentage of production and transportation workers.

The top Ten Private Sector Employers are shown in the following table.

## 10 Largest Private Employers

<b>Employer</b>	<b>Type of Industry</b>	<b>Number of Employees</b>
Trane Company	Manufacturing	1,700
Convergys Corporation	Retail and Wholesale	1,400
Wal-Mart Supercenter	Retail	1,300
Gateway Medical Center	Health	1,100
Quebecor World Inc.	Manufacturing	1,000
Jostens, Printing & Publishing	Manufacturing	600
Robert Bosch Corporation	Manufacturing	500
Bridgestone Metalpha USA, Inc.	Manufacturing	400
Letica Corporation	Manufacturing	400
Progressive Directions, Inc.	Health	300

Source: Tennessee Department of Economic and Community Development, 2009 and Clarksville Area MPO 2035 Metropolitan Transportation Plan

It should also be noted that the Clarksville-Montgomery County School System employs over 3,800 persons, the City of Clarksville has approximately 1,000 employees, the County over 900 employees and Austin Peay approximately 900 employees. The Hemlock Semiconductor Group has begun construction of a new manufacturing facility which will ultimately employ some 300 persons.

The presence of a significant number of manufacturing jobs, significant employment in the government and education sectors, as well as the presence of over 35,000 military personnel, help create a solid and stable economic environment for the community.

### ***Unemployment***

Unemployment reached 9.3 percent in Clarksville as of December 2010, but climbed even higher over the course of 2011, exceeding 10.0 percent on three occasions. The figure has remained stubbornly high, and the preliminary figure for September 2011, the latest available, is 9.9 percent. The table below shows the annual average for 2010 and monthly percentages for 2011.

## CLARKSVILLE UNEMPLOYMENT FIGURES, 2011

Year	Period	labor force	employment	unemployment	unemployment rate
2010	Annual	53444	48478	4966	9.3
2011	Jan	53718	48200	5518	10.3
2011	Feb	54466	48884	5582	10.2
2011	Mar	55132	49769	5363	9.7
2011	Apr	55186	49992	5194	9.4
2011	May	55095	49842	5253	9.5
2011	Jun	55520	49828	5692	10.3
2011	Jul	55197	49805	5392	9.8
2011	Aug	55187	49745	5442	9.9
2011	Sep	55327(P)	49826(P)	5501(P)	9.9(P)

*Source: Bureau of Labor Statistics, Local Area Unemployment Statistics, December, 2011*

Despite the City’s relatively strong and diverse economic base, unemployment has been, and remains a persistent problem, affecting the ability of many households to obtain adequate and affordable housing. The relatively low overall level of educational attainment poses some problems in attracting better paying jobs, especially as many types of positions increasingly require higher educational levels and specialized training.

### ***Income and Poverty***

The following table compares key income and poverty figures for the city, the County, the state, and the United States.

### **SELECTED INCOME AND POVERTY STATISTICS CLARKSVILLE, TENNESSEE, AND THE UNITED STATES – 2010 ACS**

	Clarksvil le	Tennessee	United States
Median Household Income (\$)	\$43,326	\$41,161	\$50,046
Per Capita Income (\$)	\$19,151	\$22,463	\$26,059
Persons in Poverty (%)	19.2%	25.7%	15.3%

*Source: ACS, 2010*

Clarksville’s Median household Income is 86.5 percent of the national figure but 105.0 percent per cent of the State figure. The differences for the Per Capita Income (PCI) are striking; Clarksville’s PCI is 73.4 percent of the national figure and 85.2 percent of the State figure.

Clarksville does have a higher percentage of households with retirement income than the nation (20.4% vs. 17.5%) and a lower percentage of households with Social Security income (17.5% vs. 28.4%), which is in line with the fact that the population is younger than the national average. At the same time, the percentage of persons with Supplemental Security Income is 2.8 percent compared to the national figure of 5.1 percent. However, the percentage of persons receiving Food Stamp/SNAP benefits is 13.0 percent, which is higher than the national percentage, 11.9.

One of the concerns noted in the City’s Consolidated Plan is the concentration of low-income households. Identifying concentrations of low-income households and racial and ethnic minorities is helpful in identifying possible patterns of discrimination. The City has a substantial number of households with an income of less than \$15,000; indeed, 15.8 percent of households, some 7,438 households, are below this figure. The table below shows the number and percentage of households at various income levels.

**CLARKSVILLE HOUSEHOLD INCOMES, 2011**

Income	Clarksville #	Clarksville %
<\$10,000	5,004	10.6
\$10,000-\$14,999	2,434	5.2
\$15,000-\$24,999	4,364	9.3
\$25,000-\$34,999	6,070	12.9
\$35,000-\$49,999	8,713	18.5
\$50,000-\$74,999	10,676	22.7
\$75,000-\$99,999	5,283	11.2
\$100,000-\$149,999	3,266	6.9
\$150,000-\$199,999	570	1.2
>\$200,000	625	1.3

*Source: ACS, 2010*

HUD has provided detailed data as part of its Comprehensive Housing Affordability Strategy materials to assist in preparing the Consolidated Plan and implementing HUD programs. HUD established five income categories for its analysis of incomes. The five income ranges are:

- Extremely Low (0-30% of the median income),
- Very Low-income (31-50% of the median income),
- Low-income (51-80% of the median),
- Moderate-income (81-95% of the median), and
- Upper-income (95% and above of the median).

The table below shows the distribution of Extremely Low-, Very Low-, Low- and Moderate-income households in the City based upon this data. The 2011 Median Income figure for a family of four in Montgomery County, calculated by HUD, is \$53,500.

**HUD AREA MEDIAN HOUSEHOLD INCOME  
CLARKSVILLE, 2011**

Income Category	2011 Median HH Income \$53,500	Approx. # of HH	Approx. % of HH
<30% AMI	\$16,050	7838	16.7%
31-50% AMI	\$26,750	4676	9.9%
51-80% AMI	\$42,800	10457	22.2%
81-95% AMI	\$50,825	4290	9.1%
96%+ AMI	\$51,360	19,744	42.0%

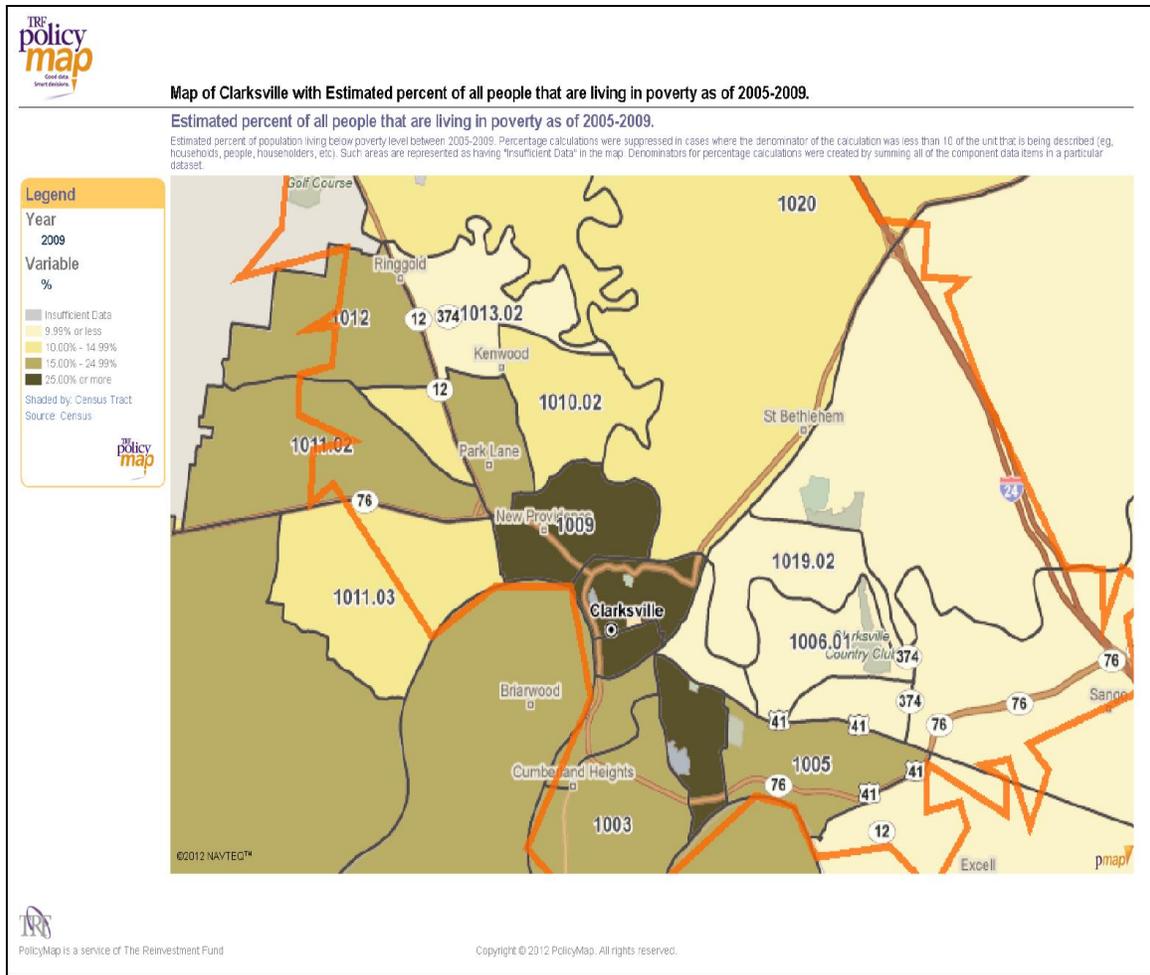
*Source: HUD Income Limits Documentation System*

By these definitions, 48.8 percent of Clarksville households are in the lowest income categories.

Poverty is an issue in Clarksville as 16.1 percent of the population had an income in the preceding twelve months that was below the established poverty level. Fifteen percent of the elderly and 26.9 percent of persons under 18 are in this group.

Appendix F presents a table and map showing median family incomes and percentages of persons in poverty in Clarksville and Montgomery County.

The map below shows that poverty is greatest in census tracts in the southern portion of the City. Though the figures are from the 2009 ACS, they indicate that over 23.66 percent of the persons in the lightest shaded Census Tracts were in poverty. These Census Tracts are those that contain the largest percentages of the minority population, and are also the areas deemed eligible for funding from the CDBG program.



Source: Policy Map

Lower income levels and poverty are areas of concern and affect the ability of households to obtain housing. Forty-eight percent of the City’s households are in the lowest income levels Based upon HUD’s Area Median Income calculations. Further, poverty levels are highest in the Census Tracts with the highest percentages of minority populations.

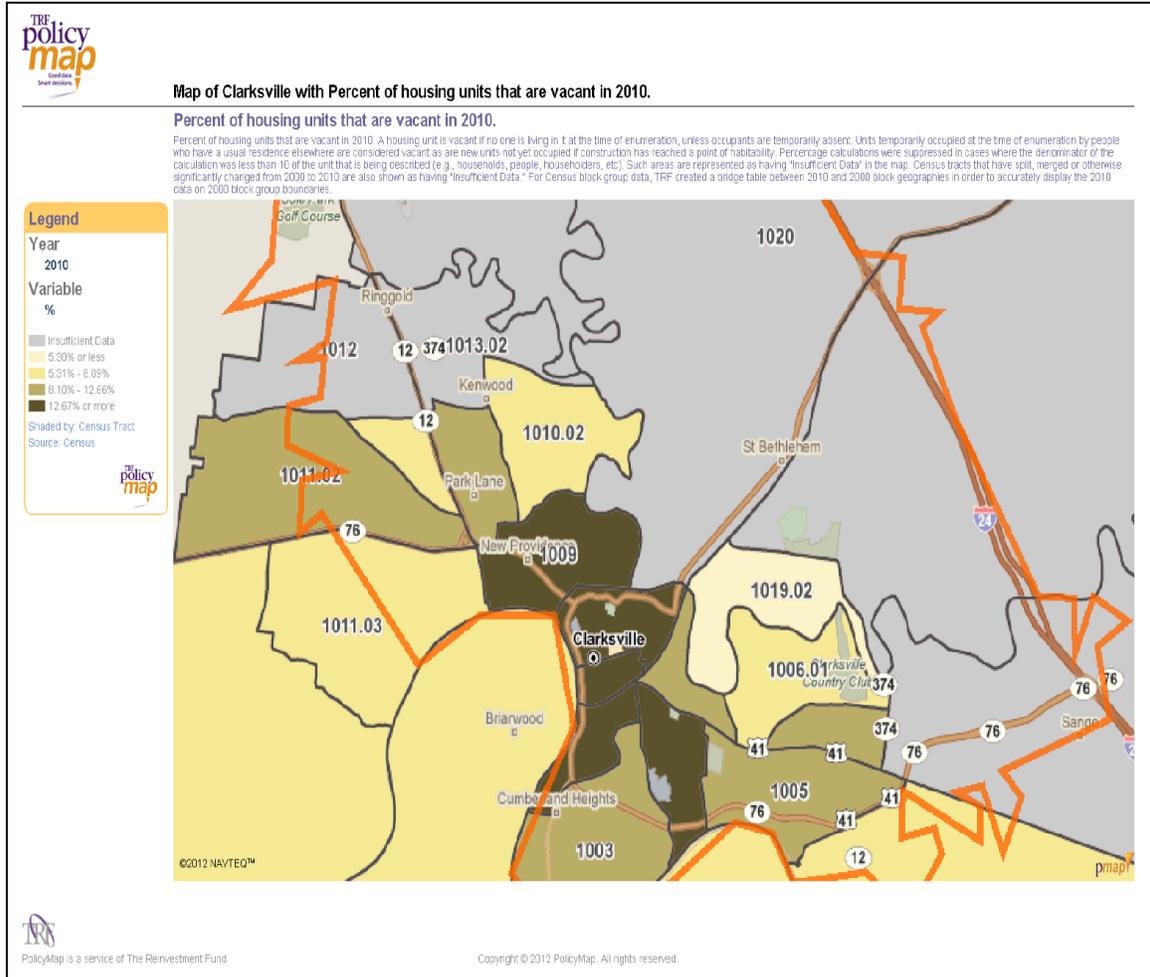
## **HOUSING DATA**

### ***Housing Stock and Condition***

Clarksville has 54,485 housing units as of the 2010 ACS figures. However, 7,480 units, 13.7 percent, are vacant. This figure is higher than the US 13.1 percent and the State’s 13.3 percent. The Clarksville homeowner vacancy rate (3.6%) is higher than that of either the State or the nation, and the rental vacancy rate (14.8%) is significantly higher than that of the State (10.3%) or the nation (8.2%). The vacancies are concentrated in

the three Census Tracts closest to the river (1009, 1008 and 1002 – the darkest shade on the map below), which are also the low-income and minority concentration Tracts.

### Clarksville Percentage of Vacant Properties – 2010



Source: Policy Map

In Clarksville the majority of housing units are single-family detached structures. The table below shows the number and percent of each type of unit in Clarksville and compares this to State and national percentages. The percentage of one unit, attached structures is above the national average, as are the percentages for the two through nine unit structures, which are most likely small apartment buildings. The percentage of units in larger structures (10+ units), indicative of larger apartment complexes, is below the national figures.

**Housing Units by Type  
Clarksville, Tennessee and the US, 2010**

<b>Type of Structure</b>	<b>Clarksville Number of Units</b>	<b>Clarksville Percent of Units</b>	<b>TN Percent of Units</b>	<b>US Percent of Units</b>
one unit, detached	37,004	67.9%	68.3%	61.4%
one unit, attached	1,652	3.0%	3.2%	5.8%
Two units	2,642	4.8%	3.0%	3.8%
3 or 4 units	3,813	7.0%	3.0%	4.4%
5 to 9 units	4,979	9.1%	4.5%	4.8%
10 to 19 units	1,346	2.5%	3.6%	4.5%
20 or more units	1,745	3.2%	4.3%	8.5%
Mobile home	1,304	2.4%	9.9%	6.6%
Boat, RV or van	0	0.0%	0.1%	0.1%
<b>Total # of Units</b>	<b>54,485</b>			

*Source: ACS, 2010*

A review of the numbers of units by room size shows that while 52.2 percent of units are 3 bedrooms, there are only 4,921 small units (no bedroom or one bedroom) – only 9.0 percent of housing units, which compares to 13.1 percent for the US. However, the 2007 CHAS data show that there are 36,805 family households of four or fewer members in Montgomery County. There are also 14,660 non-family households of four or fewer members in the County; these in particular are likely to be persons living alone, who would want these smaller units. Thus, there appears to be a shortage of small units

At the same time, there are 8,698 units of four or five bed rooms (15.9% of the total) for large households, compared to 19.9 percent nationally. There are, however, 5,620 large households per the 2007 CHAS data, indicating that the supply of larger units is adequate.

The housing stock in Clarksville is relatively young. In the decade between 2000 and 2010 over 15,000 housing units were built, 28.4 percent of the City’s current total. Approximately 20,000 units (37.1% of the total) were constructed before 1980, and thus might have a lead-based paint hazard, though only 2.5 percent of the units were constructed before 1940 and only 11.3 percent were built before 1960. Because of the surge in growth in the preceding two decades, the median age for housing units in Clarksville is 1989.

The condition of the housing stock in Clarksville is considered to be fair for the most part. As noted, almost one-half of the housing stock was built after 1989, so that rehabilitation and upgrading are not significant concerns in many neighborhoods. Housing problems are scattered throughout the City, though there are certain neighborhoods that appear to require substantial efforts. The older housing stock appears to be located in Census Tracts 1010.01, 1009, 1008, 1004, and 1002, which include the CDBG-eligible Tracts and those with the largest percentages of minority populations.

There are 110 units in the City that lack a complete kitchen, no units lack complete plumbing, though 376 units report using no fuel. These units represent 1.0 percent of the City’s occupied housing units.

**Tenure**

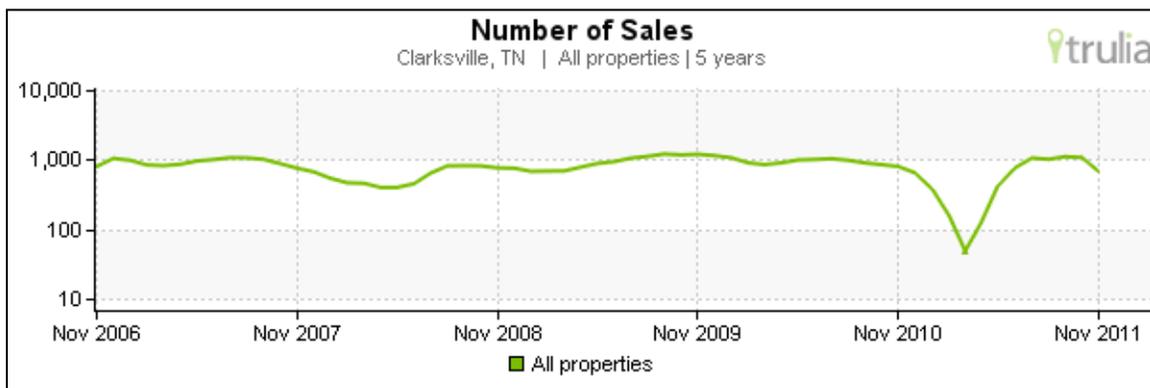
The tenure pattern in Clarksville varies from the national norm. In Clarksville, owner-occupied units constitute 59.7 percent of units while renter-occupied units comprise 41.2 percent of housing. Across the nation, the percentages are 65.4 percent owner-occupied and 34.6 percent renter-occupied. Some of this disparity may be due to the presence of the military personnel at Fort Campbell, many of whom are subject to transfer or deployment and thus not interested in purchasing a home.

**Housing Cost, Cost Burden, and Affordability**

The median rent in Clarksville was \$773 in 2010, which was 10% below the national median rent of \$855. Despite the apparent low rent, the impact of this level of expense is that 34.2 percent of households spent 35.0 percent or more of their income for rent, a figure that places them in the “severely cost burdened” category.

Homeownership has its advantages in Clarksville. While the median Clarksville home was worth \$134,400 in 2010 compared to \$179,900 for the United States the median mortgage payment for a home in Clarksville was \$1,120 in 2010 compared to \$1,496 for the nation, per the ACS data. This \$376 difference meant that only 21.6 percent of homeowners were paying 35.0 percent or more for housing, compared to 21.9 percent nationally.

The demand for housing in Clarksville has been remarkably consistent over the past five years, as the graph below from Trulia demonstrates. Except for a significant dip in late 2010 and early 2011, the Trulia figures show that sales in the Clarksville area have been steady, even as the real estate market collapsed in 2008.



Source: Trulia.com, Clarksville, TN data, December, 2011

However, sales prices were affected by the housing bust. The graph below, from Trulia, shows declines in prices in late 2008, recovery in early 2009, and another decline in late 2009, and an overall increase in through 2010-2011. However, the most recent sales

prices are above the 2008 peak, indicating a good recovery from the early 2009 recession and Trulia notes that home prices have appreciated 8.1 percent over the past five years.



Source: Trulia.com, Clarksville, TN data, December, 2011

According to the Clarksville Association of Realtors data, the average closing price for a home in October 2011 (the most recent data) was \$152,388. Using the rule of thumb that a house should cost no more than two and one-half times one’s income, a family would need an income of \$60,955 to afford a median priced home. The median income in Clarksville is \$43,326, leaving a gap of \$17,629 for a household to overcome to acquire the median-priced home. An analysis of the income ranges presented above reveals that approximately 60 percent of households in Clarksville have incomes below the \$60,955 figure.

These low-income figures mean that it is more difficult for households to meet monthly expenses, especially when housing costs more than 30% of their income, more difficult to save for a down payment for a home, and more difficult to qualify for a mortgage to purchase home, especially in light the current tight lending market.

Figures from the National Low Income Housing Coalition indicate that the Fair Market Rent in Clarksville for a studio type apartment is \$550 per month. This figure is \$156 greater than the maximum affordable rent for a household with an income at 32 percent of Area Median Income (AMI), though such a unit is affordable to households at 50 percent of AMI. To afford the smallest unit, a minimum wage worker would have to work 58 hours per week for 52 weeks a year and 70 hours a week to afford a two-bedroom apartment. The wage required in order to afford a studio apartment at the area’s fair market rent would be \$10.58, compared to the area minimum wage of \$7.25. Overall the 2010 fair market rent for apartments in Clarksville has increased 35 percent between 2000 and 2010.

The demand for **affordable** housing for low- and moderate-income households has been persistent in Clarksville. As described below, the Clarksville Housing Authority has a

long waiting list for its units and the waiting list for Section 8 vouchers has been closed because demand so far exceeds supply

### ***Public Housing***

The Clarksville Housing Authority (CHA) operates two Asset Management Projects (AMP) consisting of seven developments on four sites around the City. There are 508 units of public housing, all of which are family-type units. According to the Housing Market analysis in the recent Consolidated Plan, the CHA has 66 units with 0 & 1 bedroom; 198 two-bedroom units; and 240 units with three or more bedrooms. There are thirty-two handicapped accessible units of which four can accommodate visually or hearing impaired persons.

There are over 1,200 persons residing in CHA units, and the vacancy rate for these units is below 2 percent. The application process is currently closed, but is opened when needed. The CHA has a Five-Year Plan that includes making repairs and improvements to units, as well as infrastructure, building, and site maintenance and improvements. The CHA does not offer any homeownership or financial literacy programs, though the Lincoln Homes Resident Council does provide financial literacy classes for boys.

The CHA has received no fair housing complaints in the past two years. Residents with fair housing complaints may avail themselves of the Authority's established grievance procedures, while non-resident complaints would be directed to the Fair Housing and Equal Opportunity Office of HUD. Information on the latter is posted at all CHA properties and offices.

The CHA does not administer a Section 8 program. The Section 8 program does have a waiting list of over 1,000 people.

### **OBSERVATIONS**

Several key points relevant to potential impediments to fair housing emerge from the preceding discussion. While not definitive indicators of impediments to fair housing choice in and of themselves, they point to conditions or situations that may create impediments. These points are:

1. The population is racially diverse.
2. Only four Census Tracts have minority concentrations per HUD's definition, but these tracts are the ones with the lowest income levels, the oldest housing stock, and the most vacant properties. This may serve to limit housing opportunities for low-income households.
3. Despite a solid and diverse economic base, almost one-half of the population is in the low-income categories as defined by HUD. Unemployment has been stubbornly high and income levels are relatively low. Thus, affordability is a problem for a very large portion of the population, both owners and renters.

4. There is a high percentage of family households and those families are slightly larger than the national norm, indicating a demand for larger housing units.
5. There are relatively fewer elderly persons and persons living alone, thus a smaller demand for small housing units.
6. The Housing Authority has a significant wait list for Section 8 vouchers and for public housing units.

## **4) FAIR HOUSING PRACTICES**

This section provides an overview of the institutional structure of the housing industry in governing the fair housing practices of its members. The oversight, sources of information, and fair housing services available to residents in Clarksville are described and their roles explained.

### **OVERSIGHT ORGANIZATIONS & ENFORCEMENT PROCESSES**

As described above, City residents are protected from housing discrimination by federal, state, and local laws. These laws are enforced by agencies at each level and persons have a number of alternatives for seeking assistance if they feel they have been discriminated against. At the federal level, the Department of Housing and Urban Development and the Department of Justice have enforcement authority. Reports and complaints are filed with these agencies and the Department of Justice may take legal action in some cases. Typically fair housing service providers work in partnership with HUD and state agencies to resolve problems. However, in some cases where litigation is necessary, the case may be 1) resolved via administrative filing with HUD or the state, 2) referred for consideration to the Department of Justice, Civil Rights Division, Housing and Civil Enforcement Section; or 3) referred to a private attorney for possible litigation.

Tennessee has its own law, which provides protections to individuals with disabilities in the sale or rental of housing. This state law, known as the Tennessee Fair Housing Law, defines discriminatory practices and exemptions from the housing provisions in the Tennessee Code Annotated Sections 4-21-601 and 607. Like the federal Fair Housing Amendments Act, the State law does exclude individuals connected with the illegal manufacture or distribution of a controlled substance. The statute does not describe an enforcement mechanism other than noting that it “may also be enforced by appropriate civil action.” The Act also includes language about Blockbusting, real estate and lending practices, and restrictive covenants. As described below the Tennessee Human Rights Commission is the lead agency in enforcement actions.

Tennessee also has the Uniform Residential Landlord and Tenant Act (Tennessee Code Annotated Sections 66-28-101 through 521) which defines and describes rental agreements, landlord obligations, tenant obligations, and enforcement and remedies.

As noted above, there are a number of avenues a Clarksville resident can take to file a complaint. The Tennessee Human Rights Commission is the State agency responsible for enforcing statutes relating to discrimination in housing, employment and public accommodation, as well as coordinating State compliance with federal laws prohibiting discrimination. These types of complaints include alleged violations under the Fair Housing Act (Title VIII) and other HUD programs (Section 504 of the Rehabilitation Act of 1973, American with Disabilities Act of 1990, etc.). The Commission has cooperative agreements with HUD and the Equal Employment Opportunity Commission so that federal and State agency investigations do not duplicate or overlap. Complaints may be filed directly with the Commission.

Persons who feel that they have been discriminated against may choose to file a complaint with the Tennessee Fair Housing Council, based in Nashville. The Council has a geographic focus, which does not include Montgomery County specifically. However, the Council does operate Statewide and will accept complaints from Clarksville or Montgomery County residents. The Fair Housing Council also receives complaints from private fair housing organizations. The Fair Housing Council receives complaints by telephone, mail, fax, or office visit.

The Council provides education and outreach on fair housing issues, and provides a number of resource links and information on its Website. The Council also has received a number of HUD grants for counseling, operating a fair housing advocacy Website and testing.

The City of Clarksville has its own Fair Housing Ordinance (ordinance Number 11-1986-87, sections 1, 9-4-86), passed in 1986. This ordinance defined fair housing and discriminatory practices and created a Fair Housing Board to enforce the law. The Fair Housing Board was dissolved in 1996 when HUD found that the Board was not effective.

Through a contractual arrangement, the Legal Aid Society of Middle Tennessee and the Cumberland handled the City's housing discrimination complaints from 1996 on. However, as funding for Legal Aid has decreased, so has the organization's ability to handle these cases diminished. Legal Aid now provides assistance by disseminating fair housing materials and advertisements, referring complaints directly to either the Fair Housing Council or the Human Rights Commission. The Legal Aid Society has noted that it has received few complaints over the past few years though.

Currently, the City of Clarksville does not have an organization or entity dedicated solely to promoting fair housing and investigating or assisting in the filing of fair housing complaints. However, within the past year, the City has asked the Human Relations Commission to take on the role of fair housing enforcement at the municipal level and that body is taking steps to assume that duty. Members of the Commission are receiving training on fair housing and developing the policies, procedures, and mechanisms to handle this matter.

The City's affirmative marketing goal for the HOME program is to ensure that persons of all racial, ethnic and gender groups have the opportunity to rent or own a HOME assisted unit. The City carries out this policy through the affirmative marketing procedures established in accordance with the Final HOME Rule. These procedures are intended to further the objectives of Title VI of the Civil Rights Act of 1964, the Fair Housing Act, the Age Discrimination Act of 1975, Section 504 of the Rehabilitation Act of 1973, Section 3 of the Housing and Urban Development Act of 1968, and Executive Orders #11063 (as amended by Executive Order #12259) and #11246.

Concerted efforts continue to be made to inform local governments, nonprofits, for-profit developers, public housing authorities, and others about the affirmative marketing requirements of the HOME program.

Local government officials, in agreeing to accept CDBG funds, certify that they will “affirmatively further fair housing”. While the law does not specify what type of action recipients must take, it is clear that local government recipients are obligated to take some sort of action to affirmatively further the national goal of fair housing. The City keeps records that reflect all recipients take one or more actions to affirmatively further fair housing.

## **COORDINATION & SUPERVISION IN THE HOMEOWNERSHIP MARKET**

Many agencies are involved in overseeing real estate industry practices and the practices of the agents involved. A portion of this oversight involves ensuring that fair housing laws are understood and complied with. The following organizations have limited oversight within the lending market, the real estate market, and some of their policies, practices, and programs are described.

### **Federal Financial Institutions Examination Council (FFIEC)**

The Federal Financial Institutions Examination Council (FFIEC) is a formal interagency body empowered to prescribe uniform principles, standards, and report forms for the federal examination of financial institutions by the Board of Governors of the Federal Reserve System, the Federal Deposit Insurance Corporation, the National Credit Union Administration, the Office of the Comptroller of the Currency, and the Office of Thrift Supervision, and to make recommendations to promote uniformity in the supervision of financial institutions. The FFIEC provides data on loan originations, loan denials, and other aspects of the home loan process, as well as preparing Community Reinvestment Act rating reports on financial institutions.

### **National Association of Realtors (NAR)**

The National Association of Realtors (NAR) is a consortium of realtors, which represent the real estate industry at the local, state, and national level. As a trade association, members receive a range of membership benefits. However, to become a member, NAR members must subscribe to its Code of Ethics and a Model Affirmative Fair Housing Marketing Plan developed by HUD. The term “Realtor” thus identifies a licensed real estate professional who pledges to conduct business in keeping with the spirit and letter of the Code of Ethics. “Realtors” subscribe to the NAR’s Code of Ethics, which imposes obligations upon realtors regarding their active support for equal housing opportunity.

### **Diversity Certification**

The NAR has created a diversity certification, “At Home with Diversity: One America”, to be granted to licensed real estate professionals who meet eligibility requirements and complete the NAR “At Home with Diversity” course. The certification signals to customers that the real estate professional has been trained on working with the diversity of today’s real estate markets.

### **Tennessee Association of Realtors (TAR)**

The Tennessee Association of Realtors is a trade association of realtors statewide. As members of the Association, realtors follow a strict code of ethics. The Association has a “legal and ethics” hotline, offers Professional Standards classes and continuing education classes on “sticky situations,” professionalism, and professional standards. The Association Website also provides information about discrimination and guidelines for advertising language.

### **Tennessee Real Estate Commission**

The Tennessee Real Estate Commission is the licensing authority for real estate brokers and salespersons. The Commission has adopted education requirements that include courses in ethics and fair housing. To renew a real estate license, each licensee is required to complete continuing education, though there does not appear to be an emphasis upon fair housing issues. The Website notes to refer all housing complaints to the Human Rights Commission, and provides guidelines for preparing the analysis document.

### **Clarksville Association of Realtors**

This association of local Realtors includes the members of the local real estate community. The Website notes courses on ethics and professional standards. The Association includes 675 Realtors in 57 affiliate firms. It appears that there are three or four minority-owned real estate firms in the city, but there are no statistics about the number of minority brokers or agents available.

## **COORDINATION & SUPERVISION IN THE RENTAL MARKET**

A number of agencies are involved with the apartment rental process and related practices. This oversight includes ensuring that fair housing laws are understood. The following organizations have limited oversight within the rental housing market.

### **Tennessee Apartment Association (GAA)**

The Tennessee Apartment Association (TAA) is a state chapter of the National Apartment Association dedicated to serving the interests of Tennessee apartment owners and managers. Their Website lists a number of resources, but nothing specific to fair housing issues. There also several regional Apartment Associations across the State.

### **National Association of Residential Property Managers (NARPM)**

NARPM is an association of real estate professionals who are experienced in managing single-family and small residential properties. NARPM promotes the standards of property management, business ethics, professionalism, and fair housing practices within the residential property management field. NARPM certifies members in the standards and practices of the residential property management industry and promotes continuing professional education. NARPM offers designations to qualified property managers and management firms, and these certifications require educational courses in fair housing practices.

## **OTHER FAIR HOUSING ORGANIZATIONS**

In addition, there are a number of not-for-profit organizations concerned with fair housing issues. These organizations provide assistance to individuals who feel that they may have been the subject of discriminatory acts, or they provide services related to fair housing issues, such as credit counseling.

The National Fair Housing Alliance is a national non-profit organization dedicated to assisting low-income persons with housing problems. This organization has two affiliates in Tennessee, most notably for Clarksville, the Tennessee Fair Housing Council.

The resources and expertise of these organizations can be called upon to further fair housing and further collaboration and coordination with them can provide additional resource and expertise.

## **5) LENDING AND COMPLAINT DATA; ADVERTISING**

This section of the AI evaluates lending practices in Clarksville, using Home Mortgage Disclosure Act (HMDA) data, information from banking oversight agencies, and complaint data from local, state, and federal organizations and agencies, as well as an assessment of advertising practices.

### **HOME LOAN ACTIVITY**

#### ***Background***

A key aspect of fair housing choice is equal access to financing for the purchase or improvement of a home. In 1977, the Community Reinvestment Act (CRA) was enacted to encourage regulated financial institutions to help meet the credit needs of entire communities, including low and moderate-income persons and neighborhoods. The Home Mortgage Disclosure Act (HMDA) requires financial institutions with assets exceeding ten (10) million dollars to submit detailed information on the disposition of home loans. HMDA data were evaluated in this AI with respect to lending patterns.

Two types of purchase financing – conventional and government-backed – are examined, as well as refinancing and home improvement loans. Conventional financing refers to market-rate loans provided by private lending institutions such as banks, mortgage companies, savings and loans, and thrift institutions.

Government-backed financing refers to loans offered at below-market interest rates that are typically issued by private lenders and are guaranteed by federal agencies. These loans are offered to lower and moderate income households who may experience difficulty in obtaining home mortgage financing in the private market due to income and equity issues. Several federal government agencies offer loan products that have below-market interest rates and are insured (“backed”) by the agencies. Sources of government-backed financing include the Federal Housing Administration, the Department of Veterans Affairs, and the Rural Housing Services/Farm Service Agency (RHA/FSA). Loans backed by local jurisdictions (such as silent second loans by cities and counties) are not covered under HMDA.

HMDA data provide some insight into the lending patterns that exist in a community. However, HMDA data is only an indicator of potential problems; the data cannot be used to conclude definite redlining or discrimination practices. In the format provided on the Website, HMDA data lack the detailed information on loan terms or specific reasons for denial to make conclusive statements.

#### ***Loan Activity***

In 2010, the most recent year for which complete data is available, there were 8,816 loans applications in the census tracts that comprise the City of Clarksville. The table below shows the total number of loans applied for, the numbers of loans originated, and the number denied as well as the results of other actions. It is interesting to note that the number of refinancing loans is almost one and one-half times the number of home

purchase loans – 3,450 home purchase versus 4,921 refinancing loans. This reflects the situation in the housing market, which was still recovering from the recession and housing “bust.” Home sales were down from earlier years and many homeowners were seeking to refinance older, higher interest loans.

**City of Clarksville  
Disposition of Loan Applications, 2010**

	FHA,FRS/RHS & VA (Purchase)	FHA,FRS/RHS & VA (Purchase)	Conventional (Purchase)	Conventional (Purchase)	Refinancing	Refinancing	Home Improvement	Home Improvement	TOTAL #	TOTAL %
	#	% of Total	#	% of Total	#	% of Total	#	% of Total		
Loans Originated	2,181	81.1%	539	70.9%	2,498	50.8%	178	40.0%	5,396	61.2%
Approved, Not Accepted	59	2.2%	49	6.4%	247	5.0%	16	3.6%	371	4.2%
Applications Denied	230	8.6%	94	12.4%	1,156	23.5%	201	45.2%	1,681	19.1%
Applications Withdrawn	200	7.4%	71	9.3%	810	16.5%	47	10.6%	1,128	12.8%
File Closed for Incompleteness	20	0.7%	7	0.9%	210	4.3%	3	0.7%	240	2.7%
<b>TOTAL APPLICATIONS</b>	<b>2,690</b>		<b>760</b>		<b>4,921</b>		<b>445</b>		<b>8,816</b>	

*Source: Federal Financial Institutions Examination Council (FFIEC)  
Home Mortgage Disclosure Act (HMDA), 2010*

These figures are for the entire City, and show that while 81.1 percent of government-backed and 70.9 percent of conventional home purchase loans were approved, over 8.6 percent of government-backed and 12.4 percent of conventional loans were denied. Only a modest number of government-backed loans were approved but not accepted, indicating the potential buyer’s failure to close on the chosen property. However, the percentage of conventional loans accepted but not approved was half that of the percentage denied, indicating that a significant number of applicants had second thoughts about the purchase.

An important variable in dissecting lending outcomes is the percentage of withdrawn or incomplete loan applications. An understanding of the home buying and loan processes, income/equity requirements, and financial responsibility are important to a successful loan application and home purchase. Many households, particularly those entering the homeownership market the first time, lack financial knowledge to deal with the home buying process and may end up closing or withdrawing their application. A high rate of withdrawn or closed applications can be indicative of a lack of knowledge of the loan application and/or home buying process, or a lack of adequate assistance by the lender throughout the process. The lack of lender assistance may be discriminatory in motive or outcome. However, HMDA data are inadequate in proving motive. In any event, the percentage of withdrawn or incomplete purchase applications in Clarksville was not excessive.

The rate of acceptance for refinancing loans was low, only one-half of the applications. The percentage of refinancing loan denials is high, as is the figure for applications withdrawn. The topic is often a complicated one for the borrower and the rate of

withdrawal may reflect this fact. The approval rate for home improvement loans is low, 40.0 percent; indeed the denial rate is greater than the origination rate, though this is often the case in many areas.

A comparison of the percentage of denials among the three Census Tracts with the highest percentage of minority population and the three with the lowest percentage of minority population shows that the Census Tracts with the highest percentage of minority population had the highest percentage of denials. The difference is especially striking in the Conventional Loan Category. However, it should be noted that the Census Tracts with the highest percentages of minority population also had Median Household Incomes (MHI) that were in the range of 50 to 60 percent of the MSA, which might result in having less collateral, a weaker credit history, or a poor debt to income ratio.

### **Denial Rate by Loan Type for the Highest and Lowest Minority Population Census Tracts, Clarksville, 2010**

	% FHA, FRS/RHS, VA Denied	% Conventional Denied	% Refinance Denied	% Home Improvement Denied	Median Income as % of MSA Median Income
Census Tract 1004 - 58% Minority	14.3%	20.0%	43.1%	37.5%	58.0%
Census Tract 1008 - 55% Minority	16.6%	16.6%	0.0%	75.0%	55.0%
Census Tract 1009 - 54% Minority	11.1%	36.3%	21.4%	50.0%	54.0%
<b>AVERAGE HIGH MINORITY POPULATION TRACTS</b>	<b>14.0%</b>	<b>24.3%</b>	<b>21.5%</b>	<b>54.2%</b>	<b>55.7%</b>
Census Tract 1017 - 5% Minority	13.3%	26.8%	24.4%	45.7%	108.0%
Census Tract 1018.02 7% Minority	4.5%	7.5%	0.2%	30.0%	126.0%
Census Tract 1006.01 11% Minority	5.0%	10.5%	21.0%	57.1%	141.0%
<b>AVERAGE LOW MINORITY POPULATION TRACTS</b>	<b>7.6%</b>	<b>14.9%</b>	<b>15.2%</b>	<b>44.3%</b>	<b>125.0%</b>

*Source: Federal Financial Institutions Examination Council (FFIEC)  
Home Mortgage Disclosure Act (HMDA), 2010 & Swiger Consulting Analysis*

More detailed figures by census tract are presented in Appendix A in Table 1, the only table that provides data by Census Tract.

The HMDA data provide insight into the numbers of loans applied for, originated, and denied by race and ethnicity, though these figures are available only at the MSA level. Thus, a direct comparison or analysis of loan approvals and denials by census tract in Clarksville is not possible. However, the figures are useful for examining trends in the larger market, and assessing the general trends in Clarksville.

The table on the following page provides the data and calculations for the Clarksville MSA, showing the number of applications received, loans originated, applications denied, and those withdrawn or otherwise not approved by race and ethnicity of the applicant. The figures show that there were 11,876 applications in the MSA in 2010, so that Clarksville’s 8,816 applications represented almost three-quarters of the total applications. It should be noted that Clarksville’s statistics in consonance with those of the MSA, as the following table shows.

**Clarksville Percentages vs MSA Percentages  
2010 HMDA Data**

	MSA	MSA %	C'ville	C'ville %
Total Applications	11,873		8,816	
Loans Originated	7216	60.8%	5396	61.2%
Apps Denied	2443	20.6%	1681	19.1%
W-drawn	1406	11.8%	1128	12.8%

*Source: Federal Financial Institutions Examination Council (FFIEC)  
Home Mortgage Disclosure Act (HMDA), 2010*

The percentage of loans originated for the City is less than one percent higher than that of the MSA, while the denial percentage is only one-half a percent lower than the MSA.

The figures for the MSA show that White loan applicants for all types of loans constituted the majority (74.2%) of loan application for the period, with African American applicants third at 10.5 percent. It should be noted that the “Race Not Available” group at 11.4 percent was second, which is an unusually high percentage. The loan denial rate was highest for Two or More Minority Races (36.4%), followed by African-American applications (27.0%), and Race Not Available (25.8%). White applicants had the second lowest denial rate (18.9%), while Joint (White/Minority) had the lowest denial percentage of 16.3 percent. African Americans do not have the highest percentage of withdrawn or incomplete applications, but the groups that do have higher percentages are far fewer in number. Whites had a rate of withdrawn or incomplete applications that was moderate relative to the other groups involved.

Compared to the overall origination percentage (60.8%), Whites, Asians, and Joint (White/Minority) applicants exceeded the norm, while other minorities were below this figure and the Two or More Minority Races figure was only 74.8 percent of the norm.

The figures for Ethnicity (Hispanic or Non-Hispanic) indicates a high degree of equality in loan origination and loan denial among Hispanic, non-Hispanic and Joint Hispanic applicants, close to or slightly above the overall origination percentage. Those in the Ethnicity Not Available group, however, were well below the overall origination percentage and well above the loan denial rate.

**Clarksville MSA**  
**Disposition of Loan Applications by Race/Ethnicity, 2010**  
**(Home Purchase, Refinance, and Home Improvement Loans)**

Race/Ethnicity	Applications Received	# Loans Originated	Loan Origination Rate	Applications Denied	Loan Denial Rate	Withdrawn, Not Accepted, Closed or Incomplete
American Indian/Alaskan Native	66	37	56.1%	14	21.2%	15
Asian	111	76	68.5%	23	20.7%	12
Black or African-American	1250	669	53.5%	338	27.0%	243
Hawaiian or Pacific Islander	47	25	53.2%	11	23.4%	11
White	8820	5640	63.9%	1667	18.9%	1513
Two or More Minority Races	11	5	45.5%	4	36.4%	2
Joint (White/Minority Race)	208	136	65.4%	34	16.3%	38
Race Not Available	1363	628	46.1%	352	25.8%	383
<b>TOTAL FOR RACE</b>	<b>11876</b>	<b>7216</b>	<b>60.8%</b>	<b>2443</b>	<b>20.6%</b>	<b>2217</b>
Hispanic or Latino	387	236	61.0%	72	18.6%	79
Not Hispanic or Latino	9956	6238	62.7%	1975	19.8%	1743
Joint Hispanic or Latino	154	93	60.4%	31	20.1%	30
Ethnicity Not Available	1379	649	47.1%	365	26.5%	365
<b>TOTAL FOR ETHNICITY</b>	<b>11876</b>	<b>7216</b>	<b>60.8%</b>	<b>2443</b>	<b>20.6%</b>	<b>2217</b>

*Source: Federal Financial Institutions Examination Council (FFIEC)  
Home Mortgage Disclosure Act (HMDA), 2010*

The following table examines the same loan data, but from the perspective of the income levels of the applicants. In the FFIEC table the data was not presented in four income ranges as is the case elsewhere, so the moderate income category (now 80-119% of MHI)

is larger. Also because the “No Income Reported” figures are not shown, there are discrepancies in the totals.

The 80-119% applicant group was by far the largest, twice the number of the second largest group, the 120+% percent of Median Household Income group. As is typically the case, the rate of loan denial rate decreased as income level increased. The percentage of loan withdrawal was close across all income levels, though the lower income ranges had the lower percentages of withdrawals.

**Clarksville MSA**  
**Disposition of Loan Applications by Income Level, 2010**  
**(Home Purchase, Refinance, and Home Improvement Loans)**

Income of Applicant	# of Applications	# of Loans Originated	Loan Origination Rate	# of Loan Denials	Loan Denial Rate	# Withdrawn, Not Accepted, Closed, or Incomplete	Rate
< 50% of MHI	0	0	0.0%	0	0.0%	0	
50-79% MHI	542	303	55.9%	138	25.5%	101	18.6%
80-119% MHI	6868	4133	60.2%	1259	18.3%	1476	21.5%
120+% of MHI	3364	2153	64.0%	521	15.5%	690	20.5%
<b>TOTAL</b>	<b>10774</b>	<b>6589</b>	<b>61.2%</b>	<b>1918</b>	<b>17.8%</b>	<b>2267</b>	<b>21.0%</b>

*Source: Federal Financial Institutions Examination Council (FFIEC)  
Home Mortgage Disclosure Act (HMDA), 2010*

The HMDA data also shows the reasons for denial by race and ethnicity. The table below shows that among all races and ethnicities the primary reasons for denial were Credit History, Collateral, and Debt to Income Ratio. Credit History was the reason for the greatest number of denials overall (668), followed by Collateral (391), and then Debt/Income Ratio (377). This pattern applies to both Whites and African-Americans. Though the African-American applicants had a somewhat higher denial percentage than Whites because of Credit History (38.0% vs 31.0%), they had a somewhat lower percentage of denials because of Collateral issues. Though not significant in terms of percentages, it should be noted that White applicants had the greatest number of denials because of Employment History, Unverifiable Information, and Incomplete Applications. Note that some of the highest percentages of denial result from a small number of cases for some groups such as Native Americans and Pacific Islanders.

The same patterns emerge when examining the data from the perspective of Ethnicity.

**Clarksville MSA**  
**Reasons for Loan Denial by Race and Ethnicity, 2010**  
**(Home Purchase, Refinance, and Home Improvement Loans)**

Race or Ethnicity	Debt to Income Ratio	Employment History	Credit History	Collateral	Insufficient Cash	Unverifiable Information	Credit Appl. Incompl	Other	Total Denials
	# Cases	# Cases	# Cases	# Cases	# Cases	# Cases	# Cases	# Cases	# Cases
American Indian or Alaskan Native	0	0	4	5	1	0	2	2	14
Asian	6	1	4	2	0	2	1	5	21
Black or African-American	52	4	107	43	7	9	11	42	275
Hawaiian or Pacific Islander	4	0	2	1	0	1	0	1	9
White	270	37	446	261	41	57	92	207	1411
Two or More Minority Races	0	0	4	2	1	0	0	0	7
Joint (White and Minority Race)	4	0	7	7	1	1	0	6	26
Race Not Available	41	5	94	70	10	12	29	33	294
<b>TOTAL FOR RACE</b>	<b>377</b>	<b>47</b>	<b>668</b>	<b>391</b>	<b>61</b>	<b>82</b>	<b>135</b>	<b>296</b>	<b>2057</b>
Hispanic or Latino	14	1	27	14	3	0	6	4	69
Not Hispanic or Latino	315	40	539	303	48	67	95	257	1664
Joint Hispanic or Latino	8	1	7	5	0	1	0	3	25
Ethnicity Not Available	40	5	95	69	10	14	34	32	299
<b>TOTAL FOR ETHNICITY</b>	<b>377</b>	<b>47</b>	<b>668</b>	<b>391</b>	<b>61</b>	<b>82</b>	<b>135</b>	<b>296</b>	<b>2057</b>

*Source: Federal Financial Institutions Examination Council (FFIEC)  
Home Mortgage Disclosure Act (HMDA), 2010*

The following table shows the reason for denial data from the perspective of loans denied by income level. The number of denials by reason remains the same and the overall denial rate is 17.3 percent. As one would expect the percentage of denials in general

decreases as the income level increases. Thirty percent of loan applications by the lowest income applicants were denied, compared to only 16.0 percent among the highest income applicants. Debt to Income Ratio and Credit History were the most common reasons for denial among low-income applicants, while Credit History and Collateral were the most common for high income applicants.

**Clarksville MSA**  
**Reasons for Loan Denial by Income Level, 2010**  
**(Home Purchase, Refinance, and Home Improvement Loans)**

Income as % of MSA Median	Total # of Applications	Debt to Income Ratio	Employment History	Credit History	Collateral	Insufficient Cash	Unverifiable Info	Credit Appl. Incomplete	Other	Total Denials by Income Level	% Denials by Income Level
		# Denied	# Denied	# Denied	# Denied	# Denied	# Denied	# Denied	# Denied	# Denied	% Denied
< 50%	811	81	11	77	25	10	8	6	25	243	30.0%
50-79%	2002	103	15	149	58	13	15	7	46	406	20.3%
80-99%	1704	40	3	102	45	8	10	19	36	263	15.4%
100-119%	1320	40	5	74	46	11	8	16	45	245	18.6%
> 120%	4676	107	12	207	189	19	35	57	121	747	16.0%
Income Not Available	1363	6	1	59	28	0	6	30	23	153	11.2%
<b>TOTAL</b>	<b>11876</b>	<b>377</b>	<b>47</b>	<b>668</b>	<b>391</b>	<b>61</b>	<b>82</b>	<b>135</b>	<b>296</b>	<b>2057</b>	<b>17.3%</b>

*Source: Federal Financial Institutions Examination Council (FFIEC)  
Home Mortgage Disclosure Act (HMDA), 2010*

**CRA RATING**

The Community Reinvestment Act (CRA) is intended to encourage regulated financial institutions to help meet the credit needs of entire communities, including low and moderate-income neighborhoods. CRA ratings are provided for the main or regional headquarters of the financial institution. Depending on the type of institution and total assets, a lender may be examined by different agencies for its CRA performance. Databases maintained by the Federal Reserve Board (FRB), Federal Financial Institutions Examination Council (FFIEC), Federal Deposit Insurance Corporation (FDIC), and Office of the Comptroller of the Currency (OCC) were researched for the performance of the top financial institutions issuing home loans.

Among the lenders active in the City, nine received ratings from the FFIEC. The table below shows the most recent rating received by these financial institutions. All lending institutions examined received Satisfactory ratings.

**FFIEC Interagency Community Reinvestment Act (CRA) Ratings  
Clarksville, TN MSA: 2011**

<b>Institution Name</b>	<b>State</b>	<b>Year Rated</b>	<b>Rating</b>
Farmers and Merchants Bank.	TN	2011	Satisfactory
Guaranty Federal Savings (Green Bank)	TN	1996	Satisfactory
Bank of America	TN	2009	Satisfactory
Region Bank	TN	2009	Satisfactory
Heritage Bank	TN	1999	Satisfactory
Planters Bank	TN	2008	Satisfactory
Legends Bank	TN	2011	Satisfactory
Cumberland Bank and Trust Company	TN	2007	Satisfactory
First Federal Savings Bank	TN	2008	Satisfactory

*Source: Federal Financial Institutions Examination Council's (FFIEC), 2009*

**FAIR HOUSING COMPLAINT DATA**

As described earlier, there are a number of organizations and agencies with oversight in the area of fair housing and discrimination in housing. This section of the Analysis of Impediments will review and assess information about housing discrimination complaints and reports on housing opportunity in Clarksville.

There were no Title VIII complaints filed in Montgomery County in 2010, nor are there any Department of Justice cases involving Entities in Montgomery County.

The Tennessee Human Rights Commission documents and reports available on its Website do not contain any information about housing discrimination complaints pertaining to Montgomery County or Clarksville specifically. Attempts to obtain more detailed information about fair housing complaints from the Commission were unsuccessful. The Commission's Housing Division statistics that are available indicate only that Montgomery County is not among the top five counties filing discrimination complaints. A follow-up e-mail from the Division's Housing Coordinator stated that only six percent of housing discrimination complaints came from Montgomery County. This would equate to eight of the State's 140 accepted complaints.

However, since the Commission is the administrator for fair housing issues, the data obtained from the HUD Fair Housing Equal opportunity Website is very likely as accurate and current as any obtained from the Commission.

The FHEO data is available only at the County level and thus the figures presented here reflect the County, not simply the City. The data cover the period July 2006 to July 2010, and are the most recent and complete available. During this period there were fifteen complaints filed. A breakdown by year and type of complaint follows:

**Fair Housing Complaints Filed with HUD, Montgomery County, 2007-2010**

<b>Year</b>	<b>Basis of Complaint</b>
<b>2006</b>	<b>Disability</b>
<b>2007</b>	<b>Race - Black</b>
<b>2007</b>	<b>Race – Black and White</b>
<b>2008</b>	<b>Disability</b>
<b>2008</b>	<b>Religion</b>
<b>2008</b>	<b>Race - Black</b>
<b>2008</b>	<b>Race – Multi-Racial</b>
<b>2008</b>	<b>Color</b>
<b>2008</b>	<b>Race – Hispanic</b>
<b>2009</b>	<b>Disability</b>
<b>2010</b>	<b>Disability &amp; Sex</b>
<b>2010</b>	<b>Disability &amp; Retaliation</b>

*Source: HUD, Office of Fair Housing and Employment Opportunity*

A complaint may be filed on multiple grounds and the statistics also show what race was the subject of their complaint. One-third of these complaints are based upon Race, and over one-half are involved Disability, a trend that is increasing around the nation.

Though not directly related to fair housing, the Human Rights Commission does keep statistics on hate crimes. This data indicates that such crimes are declining in Clarksville from a high eleven reported incidents in 2006 to one in 2010.

These data do not capture the totality of fair housing conditions in Clarksville. Not all fair housing problems are recorded or come to light as fair housing complaints. Many persons do not lodge a complaint, because, as a fair housing advocate in Oregon observed, “*All they [persons seeking housing] want is a house, not a Federal case.*”

**REAL ESTATE ADVERTISING**

This assessment of fair housing practices in Clarksville included a review of a number of publications containing advertisements for housing, both for sale and rental. Overall, there does not appear to be any attempt to exclude or discriminate against any of the protected classes. The real estate advertisements in *The Leaf and Chronicle* were

examined for three randomly selected Sundays in the period June through October 2011, as were a few weekday classified sections. In a few instances, display ads did not include the fair housing logo, and in most of the ads the logo was present, but very small. In fairness, the Realtor© logo was also very small in these ads, as the real estate firms were paying to sell houses. Some of the individual ads (classified style) indicated “no pets” or “credit check required,” but there was nothing discriminatory; indeed, some ads noted proximity to schools and/or work or Fort Campbell, and one noted the acceptance of Section 8 vouchers.

A review of the City’s Yellow Pages showed that all but one display ad showed the fair housing logo.

A number of other free real estate publications, the type found at grocery and convenience stores, were also examined. *The Peddler*, though not a real estate publication, did have several house and apartment notices, none of which showed any sign of discriminatory language. The October, 2011, *Real Estate Digest* contained no language or descriptions that suggested discrimination, though a few ads did not display the fair housing logo. All of the ads in *The Apartment Finder* contained the logo and had no discriminatory language, while *The Apartment Guide Magazine* had ads noting handicap accessibility, “accept Section 8”, and most ads displayed the fair housing logo. The Clarksville section of the regional publication, *The Nashville Apartment Guide*, included ads that referenced handicap accessibility, featured the fair housing logo, and noted that some complexes had income guidelines.

A review of on-line housing Websites (Craigslist.com and homefinder.com) included some ads noting no students, income restrictions, no pets, or no smokers, but nothing discriminatory.

It should be noted that there are only four minority-owned real estate firms among the sixty firms in the Clarksville area. The Clarksville Association of Realtors does not keep demographic statistics about its members, so there is no reliable count of minority brokers and agents.

## **OBSERVATIONS**

1. The HMDA data are inconclusive in identifying or defining any impediment to fair housing.
2. However, the loan denial rate was highest for Two or More Minority Races (36.4%), followed by African-American applications (27.0%), and Race Not Available (25.8%) compared to the denial rate of 18.9% for Whites.
3. The number of FHEO complaints for the period under review was modest and declining after 2008
4. There was no clear sign of discrimination in the language or illustrations of housing advertising in the area’s real estate publications or on line sites.

## **6) PUBLIC POLICIES AND PRACTICES**

### **LAND USE PLAN - HOUSING**

Public policies established at the local level can affect housing development and therefore, may have an impact on the range and location of housing choices available to residents. Fair housing laws are designed to encourage an inclusive living environment and active community participation. An assessment of public policies and practices enacted by the City can help determine potential impediments to fair housing opportunity. To identify potential impediments to fair housing choice and affordable housing development, housing-related documents (e.g., zoning code materials, previous fair housing assessments) were reviewed, and interviews with fair housing advocates and practitioners were conducted in preparing this AI. This section of the Analysis focuses on public policies that may impede fair housing choice in Clarksville.

Tennessee law requires municipalities to prepare Land Use Plans, including a Housing Element. This element establishes a goal of ensuring that all residents of the state have access to adequate and affordable housing. The Land Use Plan also includes a housing opportunities objective to provide quality housing and a range of housing size, cost, and density that should be provided in each community, to make it possible for all who work in the community to also live in the community. In these Plans local governments evaluate the composition and quality of the community's housing stock, the age and condition of housing, the cost of housing, the needs of households that are cost burdened, the relationship of local housing costs and availability to the socioeconomic characteristics of these households and special housing needs in the community (e.g., housing needs of residents who are elderly; homeless; persons with mental, physical, or developmental disabilities; and persons with HIV/AIDS).

The Land Use Plan Update for Clarksville and Montgomery County addresses these topics for each of the area's planning districts, and three objectives and the necessary policies to achieve each objective. The goals note in particular the need to promote safe, affordable housing with linkages to employment centers and shopping areas. Further, the Plan specifically notes the aim of reducing concentrations of low-income persons, those with disabilities, minorities, the elderly and those dependent upon special facilities and services.

### **BUILDING AND ZONING CODES**

The City also has a Building Code and a Zoning Code, which serve to protect the public interest and create safe and sanitary living conditions. However, both can affect fair housing choice. Inspection costs, permit fees, and higher quality construction requirements tend to drive up the cost of housing. Requirements for various kinds of building permits also increase the cost of a housing unit. Similarly zoning requirements that define or exclude certain types of housing can reduce the opportunity to develop a range of housing choices for individuals across the community. Overall, the City's Codes do not appear to restrict fair housing choice.

The fair housing equation is balanced on one end with equal access and on the other end with a range of housing choice. To ensure fair housing choice in a community, a zoning ordinance should provide for a range of housing types, including single-family, multi family, second dwelling units, mobile homes, licensed community care facilities, employee housing for seasonal or migrant workers, assisting living facilities, emergency shelters, and transitional housing. Single and multi-family housing types include detached and attached single-family homes, duplexes or half-plexes, townhomes, condominiums, and rental apartments. The City Code permits this range of development and permits a range of housing in a range of areas within the City.

However, there are several issues that could impinge upon fair housing choice. The definition of Group Quarters is vague in terms of the number of persons who can reside in a unit and in the usage of the term. There is no clear definition of disability, nor is there any language that specifically addresses transitional housing. These are important issues in that the number of persons residing in a halfway house or transitional facility may be affected by the presence not only of clients but resident counselors.

The issue could become one of concern as the City currently has ten licensed residential facilities for persons recovering from drug addiction or alcoholism or persons with mental retardation. The need to open additional such group homes or transitional housing often creates a “Not In My Backyard” reaction and the number of residents and other definitional issues can be used to block the creation of new facilities.

Further, despite the goals of the Land Use Plan and the City’s efforts to create incentives and zoning to facilitate the construction of affordable housing units, both rental and owner-occupied, developers have seldom undertaken the construction of such units. One focus group participant noted by way of example that if a developer built twelve units in subdivision and one of those units was required to be affordable, developers would often build only ten units on the tract to avoid building the affordable unit. Other examples of avoiding the construction of affordable units emerged in other discussions and the consensus was that without greater measures from the state level and a better understanding of affordable housing on the part of developers, it will be difficult to develop a greater supply of affordable housing.

## **TRANSPORTATION**

Transportation from housing to work, to services, and to shopping is an essential part of fair housing. Persons without automobiles, persons with disabilities, the elderly, and many others need access to reliable and convenient transportation. The City of Clarksville is served by the Clarksville Transit System which provides eight routes that cover much of the City. Seven of the routes pass through the downtown, while an eighth route connects the shopping area along northern Wilma Rudolph Boulevard with the shopping area at the intersection of the 101<sup>st</sup> Airborne Division Parkway and Fort Campbell Boulevard. This transit service provides access to the Veterans Plaza County Offices and the Public Library, the Social Security Office, schools and other services. These routes also include major employment centers and medical service facilities.

Routes operate Monday through Friday from early morning to 7:00 or 8:00 PM, depending upon the route. Saturday service is more limited, and there is no Sunday service.

The CTS also operates a service for the disabled, “The Lift.” The service is provided to disabled persons who meet certain criteria. The service is offered during the operating hours of the regular bus service.

## **OBSERVATIONS**

1. The regional Land Use Plan has the goals of promoting safe, affordable housing with linkages to employment centers and shopping areas and reducing concentrations of low-income persons, those with disabilities, minorities, the elderly and those dependent upon special facilities and services.
2. The City’s Building and Zoning Code do not limit fair housing, though some expansion and/or clarification of definitions relating to group homes and transitional housing are suggested.
3. The City’s transit system does provide a means of transportation to most of the City’s major employment, education, service, and shopping areas.

## **7) RESIDENT SURVEY & FOCUS GROUP MEETINGS**

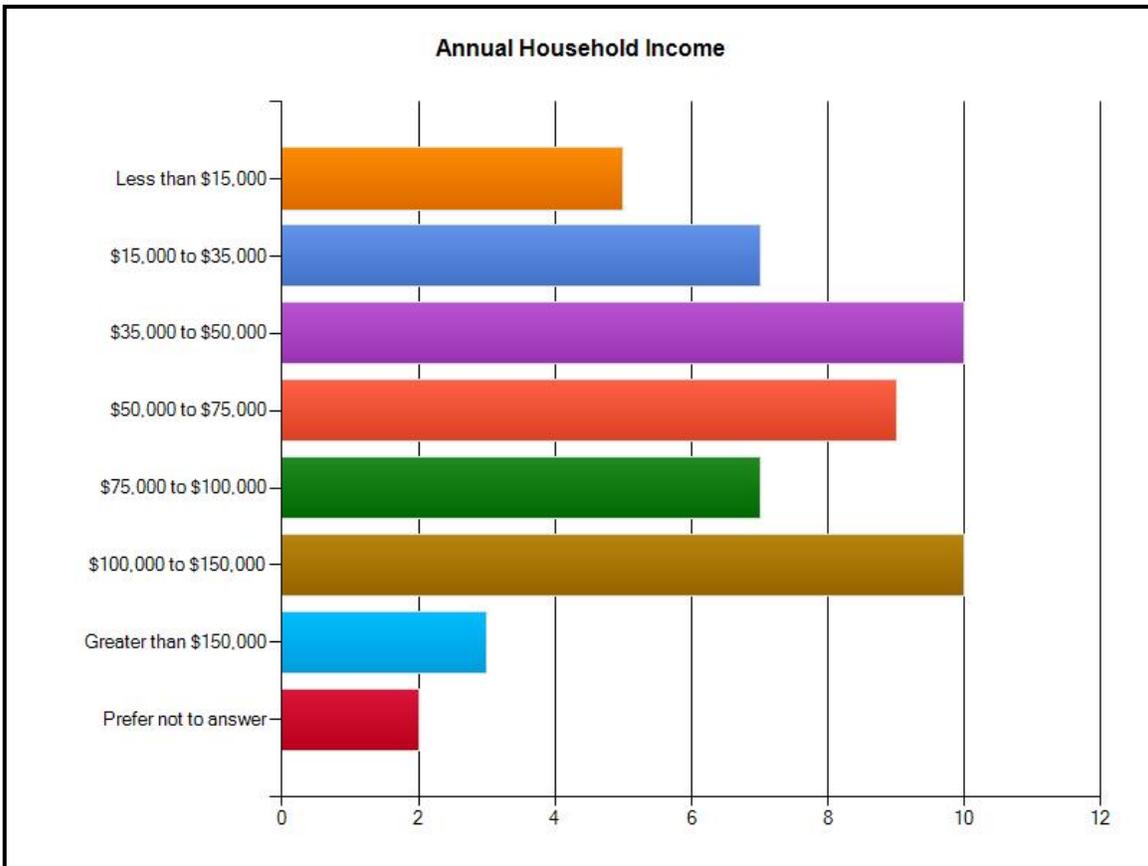
### **FAIR HOUSING SURVEY**

The Office of Housing and Community Development conducted a survey on **Fair Housing** issues. The City's survey was conducted to determine the extent to which impediments to housing, whether intentional or unintentional, were evident to residents and what the nature of those impediments are. While many of the questions focused on discrimination and the understanding of fair housing, some of the questions were detailed or specific to zoning and land use issues with which the average citizen might not be familiar. This survey helped to identify the impediments to fair housing choices that exist in Clarksville. An analysis of the responses to all questions and a copy of the English language survey are provided in Appendix B.

The survey, available in English and Spanish, was posted on the City Website from mid-October to mid-December of 2011, was advertised in *The Leaf Chronicle*, and was distributed at the focus group meetings. Focus group attendees were encouraged to advise others to take the survey on line. There were 57 responses in all; there were no responses to the Spanish language survey.

The demographic data collected at the end of the survey indicated that seventy percent of the respondents were White, twenty percent were African-American, and two percent each were Asian or Two or More Races. Six percent chose the "Prefer Not to Answer" option and three people skipped the question altogether. Two people indicated that they were Hispanic.

The incomes of the respondents were fairly evenly spread across the spectrum. Only two people chose the "Prefer Not to Answer" option and only four skipped the question. The chart below shows the number of persons at each income range.



Source: Survey Monkey and Ernest Swiger Consulting

Seventy-two percent of respondents owned their own home, and of the twenty-eight percent who rented, two-thirds reported renting a house as opposed to an apartment.

Asked to indicate in which Ward they lived, 26 persons, almost one-half of the total respondents, skipped the question, some in the focus group sessions stating that they had no idea of which Ward they resided in. Wards Five and Ten were not represented in the survey, and Ward Eleven had the highest number of respondents (7), followed by Ward Six with five persons answering.

The respondent pool was not representative of the City’s overall demographics. The income levels, the percentage of White persons, and the percentage of home owners were higher than comparable figures for the City.

Only five respondents indicated that they had personally experienced housing discrimination in Clarksville. Of this five only one went on to report this discrimination.

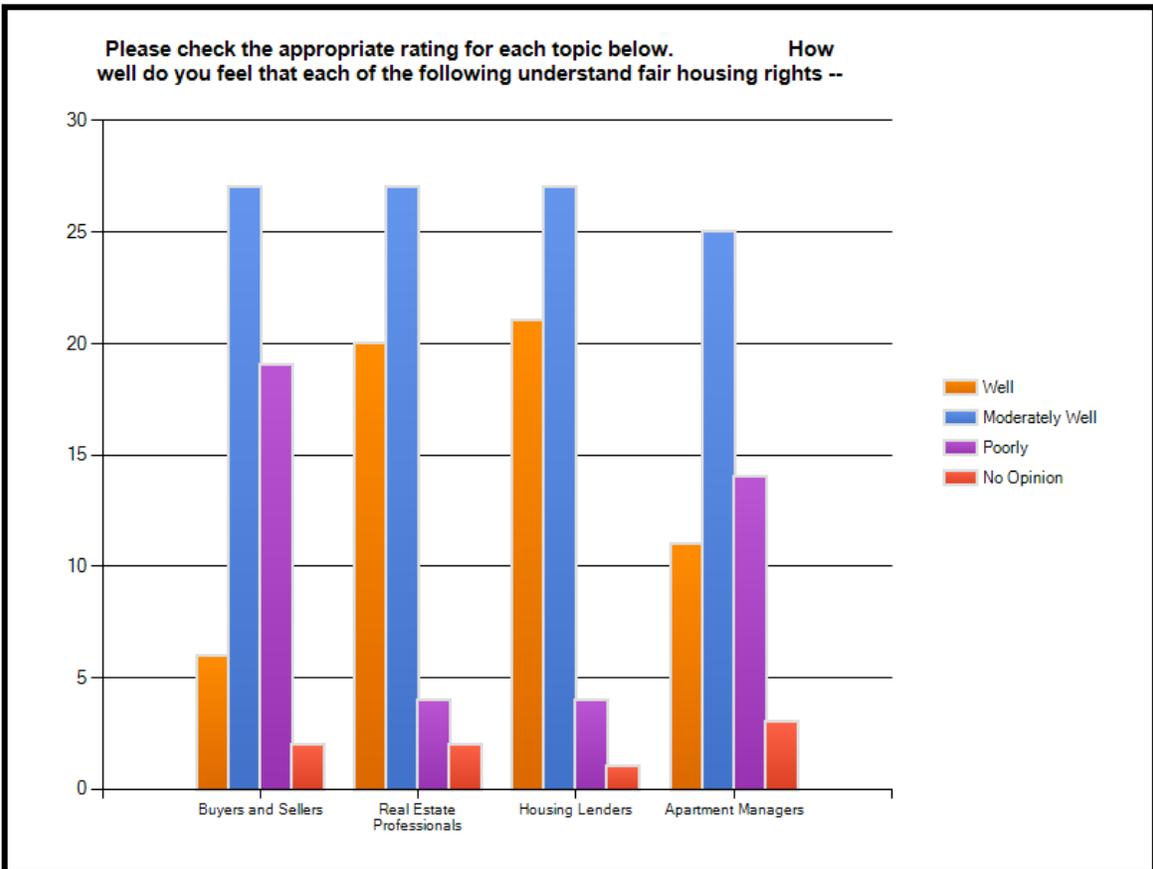
Asked if they believed that Clarksville has fair housing problems, one-third replied Yes, thirty percent replied No, and thirty-six percent replied “Do Not Know.” This indicates a degree of uncertainty about the matter. Among those who identified specific neighborhoods, Lincoln Homes was cited four times, St. B and Songe Twice each, and

Washington Street twice. New Providence and North Clarksville were mentioned and one person responded with “rentals.”

Asked if persons would know where to report housing discrimination, fifty-five percent responded “No,” and almost one-quarter of respondents replied “Don’t Know.”

The results of the question about the extent of housing discrimination in Clarksville drew a similarly ambiguous response. Twenty percent saw it as less of a concern, twenty percent saw it as more of a concern, twenty three percent said it is not a concern, and the largest number, thirty-six percent, had no opinion.

The respondents felt that people involved in various aspects of real estate understood fair housing rights only “Moderately Well.” The graph below shows the number of persons responding with less than forty percent of Real Estate Professionals and Housing Lenders deemed to understand these rights “Well.”



Source: Survey Monkey and Ernest Swiger Consulting

Question Eight shows that there is a general understanding that the City does have a zoning ordinance (78.2% answering yes to the question), though 18.2 percent do not know.

Question Nine asks about public policies that might inhibit fair housing, and the fifty percent response of “Don’t Know,” is typical for most municipalities.

Questions Ten and Eleven ask about fair housing outreach and education. Almost one-half of the respondents replied in the negative and thirty percent replied “No Opinion.” This indicates a degree necessity for additional outreach. Asked about the means to conduct this outreach, twenty-two respondents felt that media attention and brochures were the best means to provide information. Related to that, forty-five percent of respondents felt that they were not well informed about housing laws and regulations.

### **FOCUS GROUP DISCUSSIONS**

The Office of Housing and Community Development held three focus group meetings and one public meeting as part of the research for this revised Analysis. The following are synopses of each of the meetings. A copy of the presentation made to each, and copies of the sign-in sheets for each are found in Appendix E.

#### **FOCUS GROUP 11/2/11**

**9:00 AM**

#### **City Officials, Zoning Representatives, and Housing Authority**

This meeting was attended by nine persons.

The group began by discussing the needs of the disabled and elderly. One of the first points to be made was that discrimination is less of an issue than the availability of appropriate units. It was noted that one development for the disabled was located in an area without sidewalks. It was noted that the City does require that every twelfth unit in a development be handicapped accessible, but that many developers built only eight or ten units at a time, thus defeating this requirement. The group noted that the disabled population is increasing both more elderly and more disabled veterans.

The group felt that in order to avoid negative perceptions of affordable or subsidized housing, more needed to be done to make this housing blend in with the neighborhoods and be better mixed into the neighborhoods. The consensus was that the City needed to come up with more incentives to foster the development of handicapped units.

The topics of race, gender, familial status, and other issues did not elicit any comments when mentioned by the facilitator.

The City has a very diverse population with military retirees (many of whom are relatively young), seniors, Hispanics, and other minorities. However, the supply of

housing, especially affordable housing, is limited. The military need off-base housing as there is simply not enough on the base and this demand drives up prices for both rental and owner occupied units.

In summary, this group did not see any significant impediments to fair housing choice in terms of discrimination. Rather, the impediments they saw were based upon supply and price issues; a lack of affordable housing because of a strong market, and a lack of supply of units for the elderly and disabled in particular.

**FOCUS GROUP 11/2/11**  
**1:30 PM**  
**HOUSING DEVELOPERS, LENDERS**

This meeting was attended by ten persons.

The discussion began with one member reporting an instance in which a Realtor, late in the sales process, expressed racial bias. It was noted by several of the professional in the group that such language is strictly prohibited and that there is on-going training on this topic. The group noted that such training cannot always change people's thinking and ingrained biases, however.

Members of the group also noted that some people did not want to sell or rent to some people either because of inherent bias or on the basis of experience. Examples for the latter point included young people who trashed a place or people with children who left things in a very poor state (marked up walls, torn up rugs).

The group felt that the greatest impediment to housing choice right now is credit. Standards are high and many persons seeking to purchase cannot meet the current standards. There was some discussion to the effect that this also affected rental units as well.

In contrast to the morning group, the realtors and developers felt that there is an adequate supply of elderly and handicapped units, and that owners would be willing to modify units to accommodate the handicapped.

One key observation from this group was that in their opinion, many persons who might have felt discriminated against would not file a complaint. The reasons for this included fear of retribution, especially in the case of apartment renters, lack of knowledge of where to file a complaint, and the belief that filing a complaint would not make any difference.

Consideration of the issue of source of income created some debate. The consensus was that while it is difficult for some persons to show proof of adequate income, the prospective tenant or buyer should be able to produce two years of income tax filings to verify income.

The need to make affordable housing blend in with the neighborhood was also noted as an issue that needed addressing, though several examples of developments in which an observer could not identify the subsidized units were mentioned.

The consensus of this group was that discrimination still exists, but that it is more a function of individuals than a systemic or widespread concern.

## FOCUS GROUP 11/3/11 9:00 AM COMMUNITY SERVICE PROVIDERS

This meeting was attended by thirteen persons.

The discussions began with the observation that there is not enough housing available for the disabled, and that some of that housing is not readily accessible via buses or sidewalks.

Rents and deposits were also deemed to be too high for persons who could pay the rent itself. This issue was raised especially with regard to persons moving on from a homeless shelter program. These persons have a job and stability, but have little if any savings for deposits and other payments to get into an apartment, especially if they require a two- or three-bedroom unit.

The issue is compounded by renters as well as homebuyers have credit checks run on them. These checks, for which the renter had to pay, discouraged applicants because the applicant would not meet the credit standards required in many cases, and the applicants knew this going in. One person did observe that the credit check was not a reliable gauge of the renter's likelihood to be a poor tenant. The better measure there was a reference check with previous landlords. Still, landlords were seeking the credit check, and charging for it, in addition to requesting the first month's and last month's rent as deposit, again imposing a burden on a prospective renter with little savings.

Indeed, as the discussion evolved, the group identified low income as the greatest impediment to housing choice.

Several instances were noted in which renters were told that if they complained to HUD about substandard conditions in their units, their lease would not be renewed. This is a

clear violation of people's rights, and it raised the question of do people know where to go to complain.

The group knew to forward these complaints to Legal Aid, which in turn, would provide contacts to the aggrieved party. The question remains though as to whether or not individuals would in fact file a complaint.

NIMBYism was seen as a sort of on-going issue that emerged in specific cases. There had not been a significant issue in this regard for several years.

The group noted that the supply of homes for large families was not present in Clarksville, though no one knew of any instances of discrimination on the basis of family size. It was observed that men seemed to have a more difficult time renting an apartment than women because men have "more issues."

The group agreed that there is a need for more affordable housing in the City, and that the City needed to define this need and get behind efforts to create it. Also, people in the City needed to be better aware of the programs and assistance that is available to them.

## FOCUS GROUP 11/3/11

6:00 PM

### HUMAN RELATIONS COMMISSION AND PUBLIC MEETING

This meeting was attended by six members of the Human Relations Commission. No members of the public attended.

This group made a number of observations about specific instances or situations of discrimination in the City. First, they noted a lack of assistance and discrimination toward offenders just released from jail. It was also observed, as it had been in the morning meeting, that some landlords did not want to make necessary repairs and were threatening about complaints on this topic. Another observation was that students at Austin Peay did feel some racial discrimination and discrimination because they are students. The idea of discrimination based on sexual orientation was raised but not explored. Renting to large families was seen as somewhat of a problem primarily because landlords feared damage to the unit. Finally, it was stated that despite the City's very diverse nature, there are cultural differences that remain, and which may be difficult to overcome.

Asked if housing discrimination is a significant issue, the group concurred that it not, but that people are not likely to complain in any event. The reason for this the group felt was that complaints would not yield results. It was also noted that some persons who purchased HUD affordable housing were moving out of those units and renting them.

The group had some anecdotes about not maintaining these units and felt that this renting of these units was not proper.

Accessibility was also discussed, but in terms of access to the City Council Chambers, which were deemed too small for many meetings and too difficult to get to for the handicapped.

### **OBSERVATIONS**

The key points that emerge from the preceding discussion are:

1. There is ambiguity about the extent of housing discrimination in the City, though those that say it is present can identify specific areas in which it occurs.
2. The means or process to report discrimination is not clear.
3. There is a need for increased awareness about housing discrimination, based not only on the lack of certainty in responses to some questions, but in the responses to Question Ten.

## **8) FAIR HOUSING ACCOMPLISHMENTS – 2011**

The Action Plan for 2010-2011 for Clarksville includes initiatives specifically to further fair housing choices and increase access to housing and housing programs and services. The following paragraphs describe these initiatives and accomplishments.

As noted earlier, the Human Relations Commission is establishing itself as the local fair housing enforcement organization. Members of the Commission are studying fair housing law and practices, establishing the necessary policy and procedural mechanisms, and creating the operational systems to receive and handle inquiries. This process will provide residents with a clearly defined and easily accessible means to make inquiry about fair housing concerns and to file complaints if necessary. The objective is to obtain equivalent status for the Human Relations Commission and to enact a new Fair Housing Ordinance.

The City produces and distributes written materials to market affordable housing and these materials all contain language relating to the prohibition of discriminatory acts against the protected classes. The City also has embarked upon an outreach campaign focused on the Hispanic community, producing and distributing printed materials, advertisements in local papers, public service announcements and fair housing brochures for distribution at outreach activities. The City has also implemented a classroom outreach program, designed to educate elementary school children.

The City has a fair housing brochure which is available at the Office of Housing and Community Development, neighborhood and community meetings, and the local Section 8 office. Fair housing information is available on the City Website ([www.cityofclarksville.com/housingdevelopment](http://www.cityofclarksville.com/housingdevelopment)), a description of and link to the City's Title VI office and forms is provided, and a link is provided to both HUD and a Fair Housing Website.

In addition to preparing this updates Analysis of Impediments to Fair Housing Choice, the Office of Housing and Community Development carries out an annual review of CDBG and HOME programs to ensure that owners are aware of and in compliance with the Affirmative Fair Housing Plan. Changes in the program will be advertised in the local newspaper at least seven days before any change takes place.

The City has held an annual Mayor's Housing Summit over the past seven years. The purpose of these meetings is to bring interested parties together to review housing issues in the City and to develop solutions and programs to address problems and needs. These day-long meetings addressed such issues as: what is affordable housing, what is the housing challenge in the city of Clarksville, affordable housing funding strategies, the role of faith-based and community development organizations in the development of affordable housing, and special sessions on fair housing issues. The most recent summit was held on January 25, 2012.

## **9) IDENTIFIED IMPEDIMENTS, RECOMMENDATIONS AND ACTIONS**

### **Background**

This section summarizes the key findings of the AI document, and makes recommendations for actions to eliminate impediments to fair housing choice in Clarksville. This information is as comprehensive as possible, and there likely remain a number of additional remedies to these and other problems faced by home seekers.

Housing discrimination continues to occur, and manifests itself in different ways among different segments of the population. Since it continues to be the goal of the City to eliminate any existing discrimination and prevent future housing discrimination and other impediments to equal housing opportunity, the recommendations provided below provide a guide to ensure fair access to housing for all City residents.

This 2011 AI builds upon the previous AI, analyzes recent data, identifies the private and public sector conditions that foster housing discrimination, and provides recommendations for dealing with the fair housing issues identified. Based upon research in statistical materials, a review of HMDA and complaint data, interviews and focus group discussion, as well as surveys, the following is a list of key potential impediments identified in Clarksville. Each impediment below is followed by recommendations to address and eliminate that impediment.

Several of these topics are closely related and linkages among them are noted.

It should be noted that in some instances, it is necessary to strike a balance among issues. Land use policies and requirements and development standards, although sometimes adding costs to construction or rehabilitation, are necessary for the safety and health of residents

It should also be noted that Clarksville appears to have a low incidence of housing discrimination, especially as evidenced by the small number of complaints on file. This may be due in part to presence of a diverse population and the presence of the troops stationed at Fort Campbell, many of whom live off base. These households and individuals not only create the population diversity, but their transfer from other areas of the nation brings an awareness of change and diversity. This is not to say that housing discrimination does not exist, but that it seems less prevalent.

### **Key Points**

The earlier sections of this analysis noted the following key points. The Community Profile observed that:

1. The population is racially diverse, though there is a smaller percentage of Hispanic households than the national norm.
2. Only four Census Tracts have minority concentrations per HUD's definition, but these tracts are the ones with the lowest income levels, the oldest housing stock, and the most vacant properties. This may serve to limit housing opportunities for low-income households.
3. Despite a solid and diverse economic base, almost one-half of the population is in the low-income categories as defined by HUD. Unemployment has been stubbornly high and income levels are relatively low. Thus, affordability is a problem for a very large portion of the population, both owners and renters.
4. There is a high percentage of family households and those families are slightly larger than the national norm, indicating a demand for larger housing units.
5. There are relatively fewer elderly persons and persons living alone, thus a smaller demand for small housing units.
6. The Tennessee Housing Development Authority has a significant wait list for Section 8 vouchers and the Clarksville Housing Authority has a significant wait list for public housing units.

The review of complaint and lending data from the Office of Fair Housing and Employment Opportunity (FHEO) and the Housing Mortgage Data Act, as well as a review of recent real estate publications indicated the following:

1. The HMDA data are inconclusive in identifying or defining any impediment to fair housing in the data analyzed.
2. However, the loan denial rate was highest for Two or More Minority Races (36.4%), followed by African-American applications (27.0%), and Race Not Available (25.8%) compared to the denial rate of 18.9% for Whites.
3. The number of FHEO complaints for the period under review was modest and declined after 2008.
4. Disability was cited as the reason for housing discrimination complaints in both 2008 and 2009, indicating a serious concern.
5. There was no clear sign of discrimination in the language or illustrations of housing advertising in the area's real estate publications or on line sites.

A review of Public Policy issues showed the following:

1. The regional Land Use Plan has the goals of promoting safe, affordable housing with linkages to employment centers and shopping areas and reducing concentrations of low-income

persons, those with disabilities, minorities, the elderly and those dependent upon special facilities and services.

2. The City's Building and Zoning Code do not limit fair housing, though some expansion and/or clarification of definitions relating to group homes and transitional housing are suggested.
3. Despite attempts to develop affordable housing through the use of zoning and incentives, it has proven difficult to get developers to undertake affordable projects or to include affordable units in market rate projects.
4. The City's transit system does provide a means of transportation to most of the City's major employment, education, service, and shopping areas.

An analysis of the Community Survey and the focus group discussions showed:

1. There is ambiguity about the extent of housing discrimination in the City, though those that say it is present can identify specific areas in which it occurs.
2. The means or process to report discrimination is not clear, and people are not like to file a complaint because they feel it will do no good.
3. There is a need for increased awareness about housing discrimination, based upon the lack of certainty in responses to many of the questions, as well as the expressed need by half of the survey respondents for a better personal understanding of fair housing issues.
4. Affordability remains a key concern in the eyes of the focus group participants.
5. A number of focus group participants identified a need for more units for the disabled, large families, and the elderly, though developers and real estate agents felt the supply was adequate.

## **Impediments, Recommendations, and Actions**

### **IMPEDIMENT ONE – NEED FOR INCREASED AWARENESS, OUTREACH AND EDUCATION**

Clarksville has an active fair housing program. However, focus group discussions and survey results in particular note a lack of knowledge about fair housing law, policies, and practices. The need for on-going education, awareness, and outreach remains, especially among lower income households and minorities.

#### **Recommendations:**

- 1) Continue and expand efforts by City agencies, housing advocacy groups, and service organizations to inform renters and homebuyers of their rights and means of recourse if they feel they have been discriminated against.
- 2) Conduct City-led training sessions and information campaigns especially among rental property owners and managers, as well as apartment owner associations, and management companies.
- 3) Convene focus groups of advocacy groups, community based organizations, real estate industry professionals, lenders, property owners, and government agency officials to review and assess fair housing issues. These groups should identify discriminatory practices, trends, or changes in these practices, focal points of discriminatory practice, and the means or methods to address them.
- 4) Update Fair Housing information regularly and adjust strategies and actions accordingly. In particular, the groups mentioned above should continue to meet yearly (or perhaps twice yearly), for example at the Housing Summit.
- 5) Expand awareness efforts through school programs (e.g., poster contests, essay contests) coordinated with Fair Housing Month programs, and devote a Housing Summit session specifically to fair housing law and practice.
- 6) Work with housing advocacy and not-for-profit organizations to develop homeownership and home maintenance educational programs for first-time homebuyers to better prepare them for the responsibilities of ownership and home maintenance.
- 7) Continue and, if possible, expand existing to educate households and housing related organizations by disseminating Fair Housing law literature, conducting Fair Housing law seminars and training, and focusing public awareness campaigns about Fair Housing law in ethnic and minority neighborhoods, and among civic, social, religious, and special interest groups.
- 8) Provide Fair Housing materials and educational programs in Spanish, especially in neighborhoods and communities with high percentages of Spanish-speaking persons.

## **IMPEDIMENT TWO – LIMITED SUPPLY OF AFFORDABLE HOUSING**

As discussed earlier, affordability is one aspect of housing discrimination and it is difficult to talk about addressing impediments to fair housing, and actions to eliminate discrimination in housing, without simultaneously talking about development of policies, plans, programs, and projects to increase the supply of affordable housing.

Earlier sections of this Analysis addressed the issue of affordability. Suffice to say that even moderate-income households face challenges in purchasing a home in Clarksville, and low-income families face a significant cost burden for rental housing. Incentives for the creation of affordable housing should be structured so that they are stringent enough to produce the desired units, but palatable to the developer as well.

### Recommendations and Actions

- 1) Continue to use all available federal and state funding resources and programs to address high priority housing needs for rehabilitation, preservation, and development of affordable units.
- 2) Continue to work with community based organizations, affordable housing developers, and housing advocacy groups to increase the supply of disability accessible housing units, leveraging resources to the extent possible.
- 3) Take advantage of the Neighborhood Stabilization Program resources to acquire housing units and make them affordable.
- 4) Continue and, if possible, expand housing rehabilitation programs to maintain the City's base of affordable units, both owner-occupied and rental.
- 5) Research other affordable housing programs for additional ideas and practices.
- 6) Continue to seek incentives to promote developers constructing a wide range of housing types at a number of price points, considering transportation, employment centers and the availability of services and shopping in their planning (See government policies below).
- 7) Housing for special needs populations and minorities should be scattered throughout the City.

## **IMPEDIMENT THREE – LACK OF CLEAR COMPLAINT AND ENFORCEMENT STRUCTURE**

The City is aware of, and the survey and focus group discussions reinforced, the idea that there is no clear resource, agency, or mechanism to report housing discrimination. Beyond that, it appears that people would not report such discrimination because they feel it is useless or could bring negative consequences. This perception can be dispelled by first developing a clearly identified place and means to file a query or complaint, and then following through on that complaint while protecting the complainant.

### Recommendations and Actions

1. The City should continue its efforts to make the Human Relations Commission the focal point for receiving and acting upon fair housing queries and complaints.
2. This entails a concerted effort to educate the public about the role of the Commission and how to contact the Commission with inquiries and formal complaints. This also means providing the Commission with the tools and resources to carry out its mission.
3. The City should emphasize ADA requirements and accessibility guidelines to all building department, code enforcement, and planning staff and Commissioners.

### **IMPEDIMENT FOUR – GOVERNMENT POLICIES**

This impediment deals with issues relating to the development of land including housing that is available to a wide range of persons and income levels in disparate locations. This goal is affected by a wide range of factors, some of which are beyond the ability of the City to change.

Though not raised as an on-going concern in Clarksville, the proposed development or location of affordable housing, group homes, public housing, or Section 8 housing often draws storms of criticism and opposition from neighborhood residents. This “not-in-my-backyard” (NIMBY) attitude affects the availability of housing for people in the protected classes and is a significant challenge to achieving fair housing objectives.

While it is difficult to avoid this attitude, the City can take some measures to mitigate these challenges.

### Recommendations

- 1) Ensure that reasonable accommodation and disabled access issues are properly addressed in municipal zoning and construction codes, especially noting the definitional issues raised earlier.
- 2) Do as much as possible to reduce review and approval process times for both new construction and home modification applications.
- 3) Encourage the use of universal design principles in new housing developments.
- 4) Ensure that local zoning ordinances and building codes properly address issues of concern with respect to higher density housing, persons with disabilities, and group homes/congregate living/community care.
- 5) Encourage developers, housing advocacy groups, and other interested parties to conduct neighborhood outreach and information campaigns before submitting projects for review and approval.
- 6) As noted in Impediment One, undertake a public outreach/education program about fair housing and affordable housing on a regular basis.

While such efforts will not lay all misconceptions to rest, a broader understanding of the nature of fair housing and the types of persons and families involved will mitigate at least some opposition.

- 7) Seek new or additional incentives, as noted in Impediment Two, to get developers to undertake affordable projects or to include affordable units in market rate projects.

#### **IMPEDIMENT FIVE – AWARENESS OF POTENTIAL DISCRIMINATION**

The review of demographic information does not provide a clear indicator of housing discrimination among persons in the protected classes. However, statistical data can assist in identifying potential problems and topics of concern,

In the current economy and given the structure of the City’s housing stock, the incidences of discrimination may focus on rental housing, and the focus of efforts in the immediate future should be upon aspects of discrimination in the rental market, and upon some groups within the protected classes.

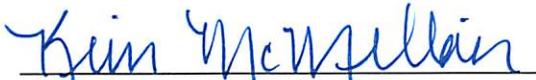
In particular, discrimination among two protected classes should be addressed.

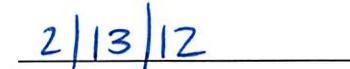
- Disabled persons may face discrimination or difficulties in finding appropriate units because of the small number of small units and the costs of building or adapting units.
- There is a high percentage of family households and those families are slightly larger than the national norm, indicating a demand for larger housing units.

#### Recommendations

- 1) Increase housing choice alternatives for the disabled and families with children by encouraging the construction of affordable, and especially rental, housing.
- 2) Convene focus groups of advocacy groups, community based organizations, real estate industry professionals, lenders, property owners, and government agency officials to review and assess fair housing issues. These groups should identify discriminatory practices, trends, or changes in these practices, focal points of discriminatory practice, and the means or methods to address them (See advocacy and outreach above).
- 3) The County should create a Fair Housing testing and auditing program, focusing upon rental properties at this time.

The City of Clarksville Tennessee, as a recipient of Community Development Block Grant (CDBG) funds and HOME Investment Partnerships (HOME) funds through the Department of Housing and Urban Development (HUD), and in order to comply with its certification to affirmatively further fair housing, has conducted an analysis of Impediments to Fair Housing Choice within the City of Clarksville. I affirm that the City of Clarksville will support activities to assure non-discrimination in the provision of housing and its accompanying transactions.

  
\_\_\_\_\_  
Kim McMillan, Mayor

  
\_\_\_\_\_  
Date

RESOLUTION 36-2011-12

A RESOLUTION ADOPTING THE ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

*WHEREAS*, the Fair Housing Act of 1968 provides for fair housing throughout the country and prohibits any person from discriminating in the sale, rental, or financing of housing; and

*WHEREAS*, the Mission of the City of Clarksville Office of Housing and Community Development is to bring needs and resources together in a coordinated housing and community development strategy to create, maintain, and expand decent housing, a suitable living environment, and economic opportunities for low and moderate income persons in the City; and

*WHEREAS*, the City of Clarksville has consistently supported the concept of the provision of fair housing for its residents without regard to race, color, religion, sex, national origin, handicap, or familial status; and

*WHEREAS*, the purpose of the Analysis of Impediments is to provide essential, specific, and detailed information and data to municipal officials, staff, policy makers, housing developers, lenders, and fair housing advocates, and to help build public support for fair housing efforts; and

*WHEREAS*, this report represents the City of Clarksville's efforts in making an objective assessment of the nature and extent of fair housing concerns in the City as well as the potential impediments to making fair housing choice available to its residents.

*NOW, THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF CLARKSVILLE:*

That the Clarksville City Council hereby adopts the 2012 Analysis of Impediments of Fair Housing Choice.

  
\_\_\_\_\_  
Mayor

*ATTEST:*

  
\_\_\_\_\_  
City Clerk

*PUBLIC HEARING:* February 2, 2012

*ADOPTED:* February 2, 2012

## **APPENDIX A**

# **HOME MORTGAGE DISCLOSURE ACT (HMDA) DATA**

## INSTITUTIONS WHO HAVE A HOME OR BRANCH OFFICE IN THE MSA/MD

21ST MORTGAGE	ACCESS NATIONAL MORTGAGE CORP	ACOPIA LLC
ALLIED HOME MORTGAGE CORP.	ALTRA FEDERAL CREDIT UNION	AMERICAN EQUITY MORTGAGE, INC.
AMERICAN FINANCIAL RESOURCES	AMERICAN INTERNET MORTGAGE, IN	AMERICAN MORTGAGE SERVICE COMP
AMERISAVE MORTGAGE CORPORATION	BANK OF AMERICA, N.A.	BANK OF CADIZ AND TRUST CO
BRANCH BANKING AND TRUST CO	CENTURY MORTGAGE COMPANY	CHURCHILL MORTGAGE CORPORATION
CITIFINANCIAL INC	CITIFINANCIAL SERVICES, INC.	CITIMORTGAGE, INC
CORNERSTONE FINANCIAL CREDIT U	CRESCENT MORTGAGE COMPANY	CUMBERLAND BANK AND TRUST
DOVER MORTGAGE COMPANY	EMBRACE HOME LOANS, INC.	ENVOY MORTGAGE, LTD.
EVERETT FINANCIAL INC	EVERHOME MORTGAGE COMPANY	F&M BANK
FARM CREDIT SERVICES OF MIDAM	FARMERS BANK AND TRUST COMPANY	FIFTH THIRD MORTGAGE COMPANY
FIRST COMMUNITY MORTGAGE INC.	FIRST FEDERAL SAVINGS BANK	FIRST GUARANTY MORTGAGE COPR
FIRST LIBERTY FINANCIAL MORT	FIRST OHIO BANC & LENDING INC	FIRST RESIDENTIAL MORTGAGE
FORT CAMPBELL FEDERAL CREDIT U	FORT SILL NATIONAL BANK	FRANKLIN AMERICAN MORTGAGE CO
FREEDOM MORTGAGE CORP.	GMAC MORTGAGE LLC	GMS FUNDING, LLC
GREENBANK	GUARANTY TRUST COMPANY	HERITAGE BANK
HOME LOAN CENTER	HOMEOWNERS MORTGAGE OF AMERICA	IFREEDOM DIRECT CORPORATION
INTEGRA BANK	LEGENDS BANK	LENDMARK FINANCIAL SERVICES
LIBERTY MORTGAGE CORPORATION	MICHIGAN MUTUAL, INC. d/b/a FI	MORTGAGE INVESTORS GROUP
MORTGAGE LENDERS OF AMERICA	MORTGAGE RESEARCH CENTER, LLC	MORTGAGE SERVICES III, L.L.C.
MOUNTAIN STATES MORTGAGE	MYERS PARK MORTGAGE	NATIONSTAR MORTGAGE LLC
NEW DAY FINANCIAL, LLC	NEW PENN FINANCIAL, INC.	NFCU
NFM, INC.	PEOPLES HOME EQUITY, INC	PHH MORTGAGE CORPORATION
PLANTERS BANK INC	PLATINUM MORTGAGE, INC.	POLARIS HOME FUNDING CORP.
PRIMARY RESIDENTIAL MORTGAGE	PRIME LENDING	PROVIDENT FUNDING ASSOCIATES
QUICKEN LOANS	RANLIFE	REAL ESTATE MORTGAGE NETWORK
REGIONS BANK	RELIANCE FIRST CAPITAL LLC	REPUBLIC STATE MORTGAGE CO.
RESIDENTIAL FINANCE CORPORATIO	SHORE MORTGAGE	SIDUS FINANCIAL, LLC
SOUTHPOINT FINANCIAL SERVICES,	SUNTRUST BANKS, INC	SUNTRUST MORTGAGE, INC
TMG REAL ESTATE & FINANCIAL	UNITED SOUTHERN BANK	URBAN FINANCIAL GROUP
US BANK NORTH DAKOTA	US BANK, N.A.	VANDERBILT MORTGAGE
WELLS FARGO FUNDING, INC	WR STARKEY MORTGAGE	

MSA/MD: 17300 - CLARKSVILLE, TN-KY

## INSTITUTIONS WHO DO NOT HAVE A HOME OR BRANCH OFFICE IN THE MSA/MD

1ST ADVANTAGE MORTGAGE	1ST MARINER BANK	ADMIRALS BANK FORMER DOMESTIC
AFFILIATED MORTGAGE COMPANY	ALLIED HOME MTG CAPITAL CORP	ALLY BANK F/K/A/ GMAC BANK
AMERICAHOMEKEY, INC	AMERICAN BANK	AMERICAN MIDWEST MORTGAGE CORP
AMERIFIRST FINANCIAL CORPORATI	AMERITRUST MORTGAGE INC.	ANDREWS FEDERAL CREDIT UNION
ARK-LA-TEX FINANCIAL SERVICES	ARMED FORCES BANK, NA	ARVEST MORTGAGE COMPANY
BANCORPSOUTH BANK	BANK OF ANN ARBOR	BANK OF ARKANSAS, NA
BANK OF COMMERCE	BANK OF ENGLAND	BANK OF KANSAS CITY
BANK OF OKLAHOMA, NA	BANKMORTGAGESOLUTIONS L.L.C.	BANKTENNESSEE
BAXTER CREDIT UNION	BEACH FIRST NATIONAL BANK	BIRMINGHAM BANCORP MORTGAGE
BNC NATIONAL BANK	BROADWAY NATIONAL BANK	BROKER SOLUTIONS INC.
CALIBER FUNDING LLC	CAPWEST MORTGAGE CORPORATION	CARNEGIE MORTGAGE
CENDERA FUNDING, INC	CHARLES SCHWAB BANK	CHRISTENSEN FINANCIAL, INC.
CIMARRON MORTGAGE COMPANY	CIS FINANCIAL SERVICES, INC.	CITIBANK, N.A.
CITICORP TRUST BANK, FSB	CITIZENS FIRST BANK	CITIZENS NATIONAL BANK
CITIZENS NATIONAL BANK	CITIZENS UNION BANK	CITY 1ST MORTGAGE SERVICES, LC
COLONIAL SAVINGS, F. A.	COMMERCE UNION BANK	COMMERCIAL BANK & TRUST CO
COMMONWEALTH CREDIT UNION	COMMUNITY TRUST BANK, INC.	CORNING FEDERAL CREDIT UNION
COUNTRYPLACE MORTGAGE	CROSSCOUNTRY MORTGAGE INC	CSB STATE BANK
DB BERKSHIRE MORTGAGE INC	DIXON BANK	E MORTGAGE MANAGEMENT, LLC
E*TRADE BANK	EAGLE NATIONAL BANK - MTG DIV	EDMONTON STATE BANK
ELECTRIC SERVICE CREDIT UNION	EQUITABLE MORTGAGE CORPORATION	EQUITY RESOURCES INC
EVANSVILLE TEACHERS FCU	EVERBANK	EVOLVE BANK & TRUST
FAIRWAY INDEPENDENT MORTGAGE	FARMERS AND MERCHANTS BANK	FIDELITY BANK
FIDELITY BANK	FIFTH THIRD BANK	Finance Center FCU
FIRST CENTURY BANK, N.A.	FIRST CHOICE BANK	FIRST EAGLE FEDERAL CREDIT UN
FIRST FEDERAL BANK	FIRST FEDERAL SAVINGS BANK	FIRST NATIONAL BANK OF AMERICA
FIRST NATIONAL BANK OF OMAHA	FIRST PLACE BANK	FIRST SECURITY BANK OF KY INC
FIRST SECURITY BANK OF OWENSBO	FIRST SOUTHERN NATIONAL BANK	FIRST STAR BANK, SSB
FIRST STATE BANK	FIRST STATE COMMUNITY BANK	FIRST TENNESSEE BANK NA
FIRSTBANK	FLAGSTAR BANK	FRANKLIN SYNERGY BANK
GATEWAY BANK, FSB	GATEWAY BUSINESS BANK	GATEWAY FUNDING DMS, LP
GCS FEDERAL CREDIT UNION	GENERATION MORTGAGE COMPANY	GENWORTH FINANCIAL HOME EQUITY
GEORGIA BANK & TRUST CO	GMFS, LLC	GRAYSTONE TOWER BANK
Greentree Mortgage Co., L.P.	GUARANTY BANK, FSB	GUIDANCE RESIDENTIAL, LLC
HANCOCK BANK AND TRUST COMPANY	HARRIS N.A.	HILLCREST BANK
HOME SAVINGS OF AMERICA	HOMEOWNERS MORTGAGE COMPANY	HOMESTAR BANK
HOMETOWN EQUITY MORTGAGE	HORIZON BANK, N.A.	HSBC MORTGAGE CORP
IBERIABANK MORTGAGE COMPANY	INDEPENDENCE BANK	ING BANK, FSB
INSBANK	JAMES B. NUTTER & CO.	JPMORGAN CHASE BANK, NA
KEMBA FINANCIAL CREDIT UNION	KENTUCKY TELCO FCU	KEYBANK NATIONAL ASSOCIATION
KIRKSTON MORTGAGE LENDING LLC	L&N FEDERAL CREDIT UNION	LENDMARK MORTGAGE AND FINANCE
LIBERTY SAVINGS BANK, FSB	LSI MORTGAGE PLUS	M&I BANK FSB
M&T BANK	MAGNA BANK	MAGNOLIA BANK
MERCHANTS AND FARMERS BANK	MERIDIAS CAPITAL INCORPORATED	MERRILL LYNCH CREDIT CORP
METLIFE BANK, N.A.	MIDDLE TENNESSEE MORTGAGE	MIDFIRST BANK
MIDWEST AMERICA FEDERAL CREDIT	MIDWEST MORTGAGE CAPITAL LLC	MORGAN STANLEY CREDIT CORP

## INSTITUTIONS WHO DO NOT HAVE A HOME OR BRANCH OFFICE IN THE MSA/MD

NASHVILLE POST OFFICE CREDIT U	NATIONAL BANK OF KANSAS CITY	NATIONS LENDING CORPORATION
NATIONWIDE ADVANTAGE MORTGAGE	NATIONWIDE BANK	NETWORK FUNDING LP
NEW YORK COMMUNITY BANK	NORTH AMERICAN SAVINGS BANK	OCEANSIDE MORTGAGE COMPANY
OHIO VALLEY FINANCIAL GROUP	OLD NATIONAL BANK	ONE REVERSE MORTGAGE, LLC
ORIGEN FINANCIAL SERVICES LLC	OXFORD LENDING GROUP, LLC	PENTAGON FEDERAL CREDIT UNION
PEOPLES BANK	PEOPLES MORTGAGE CORPORATION	PEOPLES NATIONAL BANK, N.A.
PHH HOME LOANS	PINNACLE NATIONAL BANK	PLAZA HOME MORTGAGE, INC
PNC BANK N.A.	PRESIDENTIAL BANK, F.S.B.	PRIMARY CAPITAL ADVISORS LLC
PROFICIO BANK	PROSPECT MORTGAGE LLC	QR LENDING INC
RBS CITIZENS, N.A.	REAL LIVING MORTGAGE, LLC B	RENASANT BANK
REPUBLIC BANK & TRUST COMPANY	REUNION MORTGAGE, INC	ROUNDPOINT MORTGAGE COMPANY
ROYAL UNITED MORTGAGE LLC	SACU	SECURITY FEDERAL BANK
SELECT MORTGAGE GROUP LTD	SERVICE ONE CREDIT UNION, INC.	SHELTER FINANCIAL BANK
SHELTER MORTGAGE COMPANY, LLC	SIERRA PACIFIC MORTGAGE CO INC	SIRVA MORTGAGE, INC.
SOUTH CENTRAL BANK	SOUTH CENTRAL ILLINOIS MTG LLC	SOUTHEAST FINANCIAL CREDIT UNI
SOUTHERN TRUST MORTGAGE, LLC	SOUTHWEST MISSOURI BANK	STATE FARM BANK
STONEGATE MORTGAGE CORPORATION	SUMNER BANK & TRUST	SUN WEST MORTGAGE COMPANY, INC
SUPERIOR BANK	SWBC MORTGAGE CORPORATION	SYNOVUS BANK
SYNOVUS MORTGAGE CORPORATION	TENNESSEE COMMERCE BANK	THE FARMERS BANK
THE FIRST STATE BANK	THE HUNTINGTON NATIONAL BANK	THE MONEY SOURCE, INC
THE MORTGAGE OUTLET, INC.	TOWER FEDERAL CREDIT UNION	TRADITIONS FIRST BANK
TRISTAR BANK	TRUSTMARK NATIONAL BANK	TVA CREDIT UNION
TYNDALL FCU	UBS AG, TAMPA BRANCH	UNITED COMMUNITY BANK OF WEST
UNITED FEDERAL CREDIT UNION	UNITED FIDELITY BANK	UNITED MIDWEST SAVINGS BANK
UNIVERSAL MORTGAGE & FINANCE	USAA FEDERAL SAVINGS BANK	VOLUNTEER STATE BANK
WALKER JACKSON MORTGAGE CORP	WELLS FARGO BANK, NA	WEST TOWN SAVINGS BANK
WESTSTAR MORTGAGE, INC.	WILSON & MUIR BANK & TRUST CO	WILSON BANK & TRUST
WINTRUST MORTGAGE CORPORATION	WORTHINGTON FEDERAL BANK	Wyndham Capital Mortgage, Inc.
ZIONS FIRST NATIONAL BANK		

ALL LOANS ON PROPERTY LOCATED IN MSA/MD 3/

MSA/MD: 17300 - CLARKSVILLE, TN-KY

CENSUS TRACT OR COUNTY NAME AND DISPOSITION OF APPLICATION 1/ (STATE/COUNTY/TRACT NUMBER)	Loans on 1- to 4-Family and Manufactured Home Dwellings												% Min Pop 4/	Median Income As PCT of MSA/MD Median		
	Home Purchase Loans				Refinancings	Home Improvement Loans		Loans on Dwellings For 5 or More Families	Nonoccupant Loans From Columns A, B, C and D		Loans On Manufactured Home Dwellings From Columns A, B, C & D					
	FHA, FSA/RHS & VA		Conventional			D			F		G					
	A		B		C		D		E		F				G	
Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's			
KY/CHRISTIAN COUNTY/2001.00															62	70
LOANS ORIGINATED	3	541	18	1079	32	3393	6	92			25	2179				
APPS APPROVED, NOT ACCEPTED			1	110	2	242	2	51								
APPS DENIED	2	266	8	705	22	1868	6	159			4	164	1	40		
APPS WITHDRAWN			1	45	5	752					1	130				
FILES CLOSED FOR INCOMPLETENESS	1	85														
KY/CHRISTIAN COUNTY/2002.00															40	68
LOANS ORIGINATED	9	1413	7	511	17	1499	3	131			7	393				
APPS APPROVED, NOT ACCEPTED					1	69										
APPS DENIED					7	505	2	17								
APPS WITHDRAWN			1	90	3	320										
FILES CLOSED FOR INCOMPLETENESS	1	34			1	150										
KY/CHRISTIAN COUNTY/2003.00															45	63
LOANS ORIGINATED	9	1167	5	383	13	758	1	9			6	285	1	43		
APPS APPROVED, NOT ACCEPTED																
APPS DENIED			3	124	17	1216	2	67			2	84	2	74		
APPS WITHDRAWN					4	364										
FILES CLOSED FOR INCOMPLETENESS																
KY/CHRISTIAN COUNTY/2004.00															80	62
LOANS ORIGINATED	1	39	5	205	11	517			1	93	10	440				
APPS APPROVED, NOT ACCEPTED																
APPS DENIED	1	26	2	92	15	700	2	36								
APPS WITHDRAWN					4	212	1	15			1	15				
FILES CLOSED FOR INCOMPLETENESS					1	78										
KY/CHRISTIAN COUNTY/2005.00															16	110
LOANS ORIGINATED	24	3312	19	1484	60	6041	9	175	3	1607	17	1087				
APPS APPROVED, NOT ACCEPTED	1	60	1	109	2	275										
APPS DENIED	8	1050			26	2800	1	7			1	83	1	117		
APPS WITHDRAWN	1	97	2	75	9	1007					1	41				
FILES CLOSED FOR INCOMPLETENESS					1	78										

ALL LOANS ON PROPERTY LOCATED IN MSA/MD 3/

MSA/MD: 17300 - CLARKSVILLE, TN-KY

CENSUS TRACT OR COUNTY NAME AND DISPOSITION OF APPLICATION 1/ (STATE/COUNTY/TRACT NUMBER)	Loans on 1- to 4-Family and Manufactured Home Dwellings												% Min Pop 4/	Median Income As PCT of MSA/MD Median		
	Home Purchase Loans				Refinancings		Home Improvement Loans		Loans on Dwellings For 5 or More Families		Nonoccupant Loans From Columns A, B, C and D				Loans On Manufactured Home Dwellings From Columns A, B, C & D	
	FHA, FSA/RHS & VA		Conventional		C		D		E		F				G	
	A	B	C	D	E	F	G	Number	\$000's	Number	\$000's	Number			\$000's	
KY/CHRISTIAN COUNTY/2006.00															13	128
LOANS ORIGINATED	21	2797	18	1958	94	11288	4	26			18	1260				
APPS APPROVED, NOT ACCEPTED					3	347	1	60								
APPS DENIED	6	683	8	824	29	3378	3	50					2	72		
APPS WITHDRAWN	2	318	5	437	10	1420	2	34			1	68				
FILES CLOSED FOR INCOMPLETENESS					8	1235										
KY/CHRISTIAN COUNTY/2007.00															8	116
LOANS ORIGINATED	26	3217	24	2206	88	7653	11	520			36	2387				
APPS APPROVED, NOT ACCEPTED					7	1012	3	104			1	65				
APPS DENIED	8	797	3	251	24	2220	6	116			1	80	1	6		
APPS WITHDRAWN	2	340	2	206	11	1482					2	226				
FILES CLOSED FOR INCOMPLETENESS	1	94	2	154	4	235										
KY/CHRISTIAN COUNTY/2008.00															52	67
LOANS ORIGINATED	5	528	2	68	25	1299	5	82			16	599				
APPS APPROVED, NOT ACCEPTED					1	46										
APPS DENIED			1	25	10	495	2	30								
APPS WITHDRAWN					1	56										
FILES CLOSED FOR INCOMPLETENESS																
KY/CHRISTIAN COUNTY/2009.00															10	128
LOANS ORIGINATED	20	3448	25	3069	98	13455	16	808			16	1478	3	152		
APPS APPROVED, NOT ACCEPTED	1	93	2	200	8	1635	1	205			1	148				
APPS DENIED	7	970	8	616	40	6354	7	168			3	124	2	169		
APPS WITHDRAWN			1	78	19	2145	3	254								
FILES CLOSED FOR INCOMPLETENESS					6	802	1	85								
KY/CHRISTIAN COUNTY/2010.00															3	104
LOANS ORIGINATED	5	719	6	316	28	2975	3	13					1	61		
APPS APPROVED, NOT ACCEPTED					5	486										
APPS DENIED	2	345	3	156	24	2441	2	43			1	104	2	121		
APPS WITHDRAWN	1	256	2	292	9	929										
FILES CLOSED FOR INCOMPLETENESS					1	96										

ALL LOANS ON PROPERTY LOCATED IN MSA/MD 3/

MSA/MD: 17300 - CLARKSVILLE, TN-KY

CENSUS TRACT OR COUNTY NAME AND DISPOSITION OF APPLICATION 1/ (STATE/COUNTY/TRACT NUMBER)	Loans on 1- to 4-Family and Manufactured Home Dwellings												% Min Pop 4/	Median Income As PCT of MSA/MD Median		
	Home Purchase Loans				Refinancings		Home Improvement Loans		Loans on Dwellings For 5 or More Families		Nonoccupant Loans From Columns A, B, C and D				Loans On Manufactured Home Dwellings From Columns A, B, C & D	
	FHA, FSA/RHS & VA		Conventional		C		D		E		F				G	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's			Number	\$000's
KY/CHRISTIAN COUNTY/2011.00														7	90	
LOANS ORIGINATED	9	1336	10	845	43	4350	10	224			4	123	16	811		
APPS APPROVED, NOT ACCEPTED	1	281	1	77	5	414							2	123		
APPS DENIED	6	738	9	533	13	1162	4	197			1	63	7	580		
APPS WITHDRAWN	1	271	2	46	5	553	1	21					1	27		
FILES CLOSED FOR INCOMPLETENESS			1	26	2	67										
KY/CHRISTIAN COUNTY/2012.00														8	96	
LOANS ORIGINATED	1	369	10	970	38	4767	4	125			4	269	2	49		
APPS APPROVED, NOT ACCEPTED			1	36	2	146							1	36		
APPS DENIED	2	285	5	635	13	1483	5	358			1	140	6	307		
APPS WITHDRAWN			1	111	2	353										
FILES CLOSED FOR INCOMPLETENESS																
KY/CHRISTIAN COUNTY/2013.00														35	83	
LOANS ORIGINATED	81	8769	34	2409	87	8667	5	135			49	3292	2	147		
APPS APPROVED, NOT ACCEPTED	2	160	2	122	9	1012	1	20			4	275	1	60		
APPS DENIED	19	1719	5	213	62	4891	7	307			21	1274	1	38		
APPS WITHDRAWN	16	1578	2	134	30	2779			1	1250	4	330				
FILES CLOSED FOR INCOMPLETENESS	1	58			15	1405					3	180				
KY/CHRISTIAN COUNTY/2014.00														7	116	
LOANS ORIGINATED	14	2169	18	3823	42	7184	12	499			13	2979	1	84		
APPS APPROVED, NOT ACCEPTED					1	154										
APPS DENIED	1	248	2	196	18	2936	3	120			3	286	1	50		
APPS WITHDRAWN	1	78			4	453	1	10								
FILES CLOSED FOR INCOMPLETENESS			1	54	7	1598					1	54				
KY/CHRISTIAN COUNTY/2015.00														46	66	
LOANS ORIGINATED	1	108														
APPS APPROVED, NOT ACCEPTED																
APPS DENIED					1	135										
APPS WITHDRAWN																
FILES CLOSED FOR INCOMPLETENESS																

ALL LOANS ON PROPERTY LOCATED IN MSA/MD 3/

MSA/MD: 17300 - CLARKSVILLE, TN-KY

CENSUS TRACT OR COUNTY NAME AND DISPOSITION OF APPLICATION 1/ (STATE/COUNTY/TRACT NUMBER)	Loans on 1- to 4-Family and Manufactured Home Dwellings												% Min Pop 4/	Median Income As PCT of MSA/MD Median		
	Home Purchase Loans				Refinancings	Home Improvement Loans		Loans on Dwellings For 5 or More Families	Nonoccupant Loans From Columns A, B, C and D		Loans On Manufactured Home Dwellings From Columns A, B, C & D					
	FHA, FSA/RHS & VA		Conventional			D			F		G					
	A		B		C		D		E		F				G	
Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's			
TN/MONTGOMERY COUNTY/1001.00														35	57	
LOANS ORIGINATED	16	2453	2	103	1	133			1	378	1	22				
APPS APPROVED, NOT ACCEPTED																
APPS DENIED	1	112	4	416	3	239	1	16			1	90	1	72		
APPS WITHDRAWN	2	308	2	152	1	195					1	52				
FILES CLOSED FOR INCOMPLETENESS																
TN/MONTGOMERY COUNTY/1002.00														24	74	
LOANS ORIGINATED	13	1474	2	159	8	651	2	9	1	1700	4	62				
APPS APPROVED, NOT ACCEPTED	1	120														
APPS DENIED	1	120	1	71	2	131	1	5					1	71		
APPS WITHDRAWN	1	86			4	267	1	26	1	2000						
FILES CLOSED FOR INCOMPLETENESS																
TN/MONTGOMERY COUNTY/1003.00														31	94	
LOANS ORIGINATED	40	4966	20	1807	60	7262	6	134			17	1598	1	25		
APPS APPROVED, NOT ACCEPTED	2	232	2	72	7	737					1	54	1	18		
APPS DENIED	5	609			39	5154	4	156			2	235				
APPS WITHDRAWN	3	274	2	435	20	2353					1	176				
FILES CLOSED FOR INCOMPLETENESS					2	240										
TN/MONTGOMERY COUNTY/1004.00														58	57	
LOANS ORIGINATED	11	1541	2	662	20	1870	3	158			19	2345				
APPS APPROVED, NOT ACCEPTED	1	71					1	10								
APPS DENIED	2	107	1	91	19	2082	3	33			5	87				
APPS WITHDRAWN			2	69	4	242	1	5			1	67				
FILES CLOSED FOR INCOMPLETENESS					1	51					1	51				
TN/MONTGOMERY COUNTY/1005.00														23	87	
LOANS ORIGINATED	30	4772	12	1880	31	3749	3	14	2	524	4	244				
APPS APPROVED, NOT ACCEPTED	1	108			4	540					1	69				
APPS DENIED	4	992	2	332	12	1715	3	25			2	328				
APPS WITHDRAWN	4	532	4	497	19	2196	1	143			5	484				
FILES CLOSED FOR INCOMPLETENESS			1	167							1	167				

ALL LOANS ON PROPERTY LOCATED IN MSA/MD 3/

MSA/MD: 17300 - CLARKSVILLE, TN-KY

CENSUS TRACT OR COUNTY NAME AND DISPOSITION OF APPLICATION 1/ (STATE/COUNTY/TRACT NUMBER)	Loans on 1- to 4-Family and Manufactured Home Dwellings												% Min Pop 4/	Median Income As PCT of MSA/MD Median	
	Home Purchase Loans				Refinancings	Home Improvement Loans		Loans on Dwellings For 5 or More Families	Nonoccupant Loans From Columns A, B, C and D		Loans On Manufactured Home Dwellings From Columns A, B, C & D				
	FHA, FSA/RHS & VA		Conventional			D			F		G				
	A		B		C		D		E		F				G
Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's		
TN/MONTGOMERY COUNTY/1006.01														11	141
LOANS ORIGINATED	17	3189	13	1729	32	5613	2	10			4	465			
APPS APPROVED, NOT ACCEPTED			2	160	2	144									
APPS DENIED	1	162	2	252	12	2159	4	50			1	64			
APPS WITHDRAWN	2	488	2	700	10	1166	1	5							
FILES CLOSED FOR INCOMPLETENESS					1	55									
TN/MONTGOMERY COUNTY/1006.02														11	124
LOANS ORIGINATED	12	1754	12	1403	24	2439	2	10			4	188			
APPS APPROVED, NOT ACCEPTED			1	147	2	236					1	114			
APPS DENIED	1	92	2	207	10	1189	1	5							
APPS WITHDRAWN			1	61	4	403									
FILES CLOSED FOR INCOMPLETENESS					3	372	1	53							
TN/MONTGOMERY COUNTY/1007.00														41	82
LOANS ORIGINATED	8	1781	11	1661	14	1612	2	123	1	260	8	869			
APPS APPROVED, NOT ACCEPTED					1	94									
APPS DENIED	1	207	2	154	9	795	2	50			2	160			
APPS WITHDRAWN	2	305	1	176	7	1278	1	57							
FILES CLOSED FOR INCOMPLETENESS															
TN/MONTGOMERY COUNTY/1008.00														55	50
LOANS ORIGINATED	2	293	6	711	3	326	1	75			3	382	1	49	
APPS APPROVED, NOT ACCEPTED			4	69	1	162					2	176	4	69	
APPS DENIED	1	37	2	161			3	133			1	71	1	81	
APPS WITHDRAWN	3	210			1	57			1	300					
FILES CLOSED FOR INCOMPLETENESS					1	75									
TN/MONTGOMERY COUNTY/1009.00														54	64
LOANS ORIGINATED	14	1217	6	754	13	666			3	829	14	1069			
APPS APPROVED, NOT ACCEPTED					3	236	1	12			1	12			
APPS DENIED	2	156	4	162	6	537	2	14					1	46	
APPS WITHDRAWN	1	80	1	25	5	366					2	97			
FILES CLOSED FOR INCOMPLETENESS	1	160			1	93	1	58							

ALL LOANS ON PROPERTY LOCATED IN MSA/MD 3/

MSA/MD: 17300 - CLARKSVILLE, TN-KY

CENSUS TRACT OR COUNTY NAME AND DISPOSITION OF APPLICATION 1/ (STATE/COUNTY/TRACT NUMBER)	Loans on 1- to 4-Family and Manufactured Home Dwellings												% Min Pop 4/	Median Income As PCT of MSA/MD Median
	Home Purchase Loans				Refinancings	Home Improvement Loans		Loans on Dwellings For 5 or More Families	Nonoccupant Loans From Columns A, B, C and D		Loans On Manufactured Home Dwellings From Columns A, B, C & D			
	FHA, FSA/RHS & VA		Conventional			D			F		G			
	A		B		C		D		E		F			
Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	
TN/MONTGOMERY COUNTY/1010.01													38	84
LOANS ORIGINATED	62	7286	7	679	41	3853	4	126			13	905		
APPS APPROVED, NOT ACCEPTED	3	342	1	120	6	486	2	13			1	6	1	120
APPS DENIED	6	626	1	168	22	1921	8	102			4	331		
APPS WITHDRAWN	9	1116	2	134	19	2012	2	31			4	292		
FILES CLOSED FOR INCOMPLETENESS					3	322								
TN/MONTGOMERY COUNTY/1010.02													48	100
LOANS ORIGINATED	42	4934	8	641	38	3716	5	98			9	745		
APPS APPROVED, NOT ACCEPTED			1	62	3	461								
APPS DENIED	9	1137	3	225	33	3234	5	151			2	137	1	74
APPS WITHDRAWN	4	436	1	3	13	1576	2	86						
FILES CLOSED FOR INCOMPLETENESS					2	264								
TN/MONTGOMERY COUNTY/1011.01													42	95
LOANS ORIGINATED	86	13548	5	372	30	2489	2	7	1	2950	10	767		
APPS APPROVED, NOT ACCEPTED					1	42								
APPS DENIED	9	1140	1	93	15	1239	1	8						
APPS WITHDRAWN	4	594	1	104	12	1369								
FILES CLOSED FOR INCOMPLETENESS					3	325								
TN/MONTGOMERY COUNTY/1011.02													40	96
LOANS ORIGINATED	96	10967	19	1343	82	7118	9	341			39	2795	1	139
APPS APPROVED, NOT ACCEPTED	3	259	1	62	8	777	3	116			3	252		
APPS DENIED	10	1089			62	6111	17	569			6	407		
APPS WITHDRAWN	5	585	1	148	42	4396	2	49			3	438		
FILES CLOSED FOR INCOMPLETENESS					8	895								
TN/MONTGOMERY COUNTY/1011.03													20	101
LOANS ORIGINATED	45	6617	7	675	39	4396	6	233			10	1092		
APPS APPROVED, NOT ACCEPTED	1	77			2	149					2	149		
APPS DENIED	5	570	2	137	24	2468	2	75			1	80	1	45
APPS WITHDRAWN	4	538	1	124	15	1826	1	22			1	156		
FILES CLOSED FOR INCOMPLETENESS	1	107			3	327								

ALL LOANS ON PROPERTY LOCATED IN MSA/MD 3/

MSA/MD: 17300 - CLARKSVILLE, TN-KY

CENSUS TRACT OR COUNTY NAME AND DISPOSITION OF APPLICATION 1/ (STATE/COUNTY/TRACT NUMBER)	Loans on 1- to 4-Family and Manufactured Home Dwellings														% Min Pop 4/	Median Income As PCT of MSA/MD Median
	Home Purchase Loans				Refinancings		Home Improvement Loans		Loans on Dwellings For 5 or More Families		Nonoccupant Loans From Columns A, B, C and D		Loans On Manufactured Home Dwellings From Columns A, B, C & D			
	FHA, FSA/RHS & VA		Conventional		C		D		E		F		G			
	A	B	C	D	E	F	G	Number	\$000's	Number	\$000's	Number	\$000's			
TN/MONTGOMERY COUNTY/1012.00															37	95
LOANS ORIGINATED	48	5747	12	1992	51	4795	3	21	6	2453	19	2277	1	66		
APPS APPROVED, NOT ACCEPTED	3	305			5	438										
APPS DENIED	6	688	4	219	48	5040	8	83			3	164	3	139		
APPS WITHDRAWN	2	244			32	3498	3	112	1	14150	4	433				
FILES CLOSED FOR INCOMPLETENESS	1	199	1	30	8	904										
TN/MONTGOMERY COUNTY/1013.01															47	93
LOANS ORIGINATED	310	46819	34	3129	177	22262	6	168	3	4423	54	5719				
APPS APPROVED, NOT ACCEPTED	5	772	1	35	20	2516					4	530	1	35		
APPS DENIED	30	4403	3	257	118	12958	21	411			14	1068	4	377		
APPS WITHDRAWN	19	2543	4	545	72	8527	4	172			9	744				
FILES CLOSED FOR INCOMPLETENESS	2	316	1	75	20	2713					1	65				
TN/MONTGOMERY COUNTY/1013.02															45	109
LOANS ORIGINATED	152	22811	11	1137	87	9130	10	494	6	2536	29	2453				
APPS APPROVED, NOT ACCEPTED	5	570	1	145	9	940					2	188				
APPS DENIED	14	1686	5	331	58	6438	8	108			8	915	1	76		
APPS WITHDRAWN	21	2550	7	819	41	4443	2	121			3	251				
FILES CLOSED FOR INCOMPLETENESS	3	361			16	1849										
TN/MONTGOMERY COUNTY/1014.00															35	103
LOANS ORIGINATED					2	263					1	57				
APPS APPROVED, NOT ACCEPTED																
APPS DENIED																
APPS WITHDRAWN																
FILES CLOSED FOR INCOMPLETENESS																
TN/MONTGOMERY COUNTY/1015.00															14	125
LOANS ORIGINATED	89	13330	16	1679	133	16985	10	210			14	1334	3	149		
APPS APPROVED, NOT ACCEPTED	2	354	3	297	13	1316	1	50					4	344		
APPS DENIED	8	848	6	600	68	8468	15	526			7	594	9	744		
APPS WITHDRAWN	17	2408	2	245	39	5751	2	190			1	57	3	233		
FILES CLOSED FOR INCOMPLETENESS	1	251	1	35	14	1582	1	130								

ALL LOANS ON PROPERTY LOCATED IN MSA/MD 3/

MSA/MD: 17300 - CLARKSVILLE, TN-KY

CENSUS TRACT OR COUNTY NAME AND DISPOSITION OF APPLICATION 1/ (STATE/COUNTY/TRACT NUMBER)	Loans on 1- to 4-Family and Manufactured Home Dwellings												% Min Pop 4/	Median Income As PCT of MSA/MD Median		
	Home Purchase Loans				Refinancings	Home Improvement Loans		Loans on Dwellings For 5 or More Families	Nonoccupant Loans From Columns A, B, C and D		Loans On Manufactured Home Dwellings From Columns A, B, C & D					
	FHA, FSA/RHS & VA		Conventional			D			F		G					
	A		B		C		D		E		F				G	
Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's			
TN/MONTGOMERY COUNTY/1016.00														13	114	
LOANS ORIGINATED	51	7482	17	2041	88	11189	7	298			16	1408	4	191		
APPS APPROVED, NOT ACCEPTED	1	88	1	27	8	1245							1	27		
APPS DENIED	10	1108	4	869	37	5252	7	293			2	140	3	332		
APPS WITHDRAWN	7	948	1	252	24	3307	1	56			1	60				
FILES CLOSED FOR INCOMPLETENESS	2	273	1	120	8	1050					1	120				
TN/MONTGOMERY COUNTY/1017.00														5	108	
LOANS ORIGINATED	41	7027	23	3362	114	15989	16	526			12	798	14	1097		
APPS APPROVED, NOT ACCEPTED	1	80	4	251	10	1257	1	12					4	251		
APPS DENIED	8	1085	11	959	54	9002	16	548			1	5	11	817		
APPS WITHDRAWN	9	1515	3	227	39	5007	2	201			1	119	3	219		
FILES CLOSED FOR INCOMPLETENESS	1	227			4	867							1	49		
TN/MONTGOMERY COUNTY/1018.01														11	154	
LOANS ORIGINATED	158	35332	80	14944	367	70783	17	1422			31	4929	1	146		
APPS APPROVED, NOT ACCEPTED	5	866	1	4500	26	5587	2	147			1	4500				
APPS DENIED	14	2895	9	1613	86	16593	14	458			8	1216				
APPS WITHDRAWN	12	2769	7	2038	78	14747	2	40			3	328	1	130		
FILES CLOSED FOR INCOMPLETENESS	1	99	1	150	26	5162										
TN/MONTGOMERY COUNTY/1018.02														7	126	
LOANS ORIGINATED	106	19270	53	9671	228	35963	17	1221			19	2389	4	376		
APPS APPROVED, NOT ACCEPTED	8	1320	1	108	18	2771	1	12			2	221				
APPS DENIED	6	992	5	730	98	16741	9	562			8	1228	4	528		
APPS WITHDRAWN	13	2227	6	1208	60	10274	3	32			4	614	1	113		
FILES CLOSED FOR INCOMPLETENESS	1	218	1	150	12	1718										
TN/MONTGOMERY COUNTY/1019.01														21	127	
LOANS ORIGINATED	122	27203	69	10431	172	32057	16	1060	1	225	26	3636	14	344		
APPS APPROVED, NOT ACCEPTED	4	1339	19	995	12	2184	2	55			1	21	17	521		
APPS DENIED	10	1490	10	882	59	9011	9	619			1	68	7	546		
APPS WITHDRAWN	9	2297	5	1237	41	7366	2	114	1	5600	1	325				
FILES CLOSED FOR INCOMPLETENESS	2	121			11	1642										

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MSA/MD: 17300 - CLARKSVILLE, TN-KY

CENSUS TRACT OR COUNTY NAME AND DISPOSITION OF APPLICATION 1/ (STATE/COUNTY/TRACT NUMBER)	Loans on 1- to 4-Family and Manufactured Home Dwellings												% Min Pop 4/	Median Income As PCT of MSA/MD Median		
	Home Purchase Loans				Refinancings	Home Improvement Loans		Loans on Dwellings For 5 or More Families	Nonoccupant Loans From Columns A, B, C and D		Loans On Manufactured Home Dwellings From Columns A, B, C & D					
	FHA, FSA/RHS & VA		Conventional			D			F		G					
	A		B		C		D		E		F				G	
Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's			
TN/MONTGOMERY COUNTY/1019.02															16	168
LOANS ORIGINATED	25	5076	7	858	51	10407	7	362	2	3806	5	998				
APPS APPROVED, NOT ACCEPTED	1	107			7	1068	1	90								
APPS DENIED	1	127			15	2033	5	42			1	4				
APPS WITHDRAWN	2	299	3	567	12	2049	1	7			1	103				
FILES CLOSED FOR INCOMPLETENESS					3	814										
TN/MONTGOMERY COUNTY/1020.00															30	118
LOANS ORIGINATED	583	91327	85	17453	592	84439	22	930	2	1560	144	24317	1	170		
APPS APPROVED, NOT ACCEPTED	12	1881	6	405	78	10418					10	1081	3	145		
APPS DENIED	65	9885	10	924	245	33071	32	877			19	1786	1	17		
APPS WITHDRAWN	45	6626	12	1665	190	26903	8	459			12	1570				
FILES CLOSED FOR INCOMPLETENESS	4	466			59	9458					4	534				
KY/TRIGG COUNTY/SMALL															12	101
LOANS ORIGINATED	45	5140	74	8513	203	31460	34	883			79	11349	19	949		
APPS APPROVED, NOT ACCEPTED			5	572	16	2920	3	221			4	1056	1	87		
APPS DENIED	15	1732	18	1405	99	13870	5	54			13	2363	5	386		
APPS WITHDRAWN	2	231	7	659	40	6098					5	875	1	59		
FILES CLOSED FOR INCOMPLETENESS	1	129	3	365	21	3170	1	15			1	417	1	55		
TN/STEWART COUNTY/SMALL															5	96
LOANS ORIGINATED	49	6826	63	6500	143	18553	16	308			37	3383	35	2643		
APPS APPROVED, NOT ACCEPTED	2	120	6	371	9	940	3	320			2	71	5	269		
APPS DENIED	23	2243	30	2246	64	8753	18	674			8	1114	23	1485		
APPS WITHDRAWN	19	2494	6	417	46	5678	2	36			4	393	3	175		
FILES CLOSED FOR INCOMPLETENESS			1	37	10	1358					1	73	3	321		
MSA/MD(TOTAL)															0	0
LOANS ORIGINATED	2502	390114	877	115615	3520	484014	317	12080	33	23344	866	95366	125	7691		
APPS APPROVED, NOT ACCEPTED	66	9605	68	9052	317	43502	29	1498			44	8988	46	2105		
APPS DENIED	330	43465	199	17874	1638	208788	276	8322			158	15057	103	7410		
APPS WITHDRAWN	245	35641	103	14021	1006	136175	52	2298	5	23300	77	8444	13	956		
FILES CLOSED FOR INCOMPLETENESS	25	3198	15	1363	286	41050	5	341			14	1661	5	425		

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	Home Purchase Loans				Refinancings	Home Improvement Loans		Loans on Dwellings For 5 or More Families		Nonoccupant Loans From Columns A, B, C and D		Loans On Manufactured Home Dwellings From Columns A, B, C & D				
	FHA, FSA/RHS & VA		Conventional			D		E		F		G				
	A		B		C		D		E		F				G	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's		
INVALID GEOGRAPHIC IDENTIFIERS 2/															0	0
LOANS ORIGINATED																
APPS APPROVED, NOT ACCEPTED																
APPS DENIED																
APPS WITHDRAWN																
FILES CLOSED FOR INCOMPLETENESS																

ALL LOANS ON PROPERTY LOCATED IN MSA/MD 3/

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CENSUS TRACT OR COUNTY NAME 1/ (STATE/COUNTY/TRACT NUMBER)	Loans on 1- to 4-Family and Manufactured Home Dwellings													
	Home Purchase Loans				Refinancings		Home Improvement Loans		Loans on Dwellings For 5 or More Families		Nonoccupant Loans From Columns A, B, C & D		Loans on Manufactured Home Dwellings From Columns A,B,C & D	
	FHA, FSA/RHS & VA		Conventional		C		D		E		F		G	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
KY/CHRISTIAN COUNTY/2001.00	5	733	2	180	11	1042					1	60		
KY/CHRISTIAN COUNTY/2002.00	9	1346			2	234								
KY/CHRISTIAN COUNTY/2003.00	2	197	1	132	2	343								
KY/CHRISTIAN COUNTY/2004.00	2	78	1	74										
KY/CHRISTIAN COUNTY/2005.00	23	3068	2	202	11	1201				1	86			
KY/CHRISTIAN COUNTY/2006.00	31	4195			21	3370								
KY/CHRISTIAN COUNTY/2007.00	23	2724	6	891	18	1830				2	172			
KY/CHRISTIAN COUNTY/2008.00	2	144			5	374				1	39			
KY/CHRISTIAN COUNTY/2009.00	19	3282	1	158	24	3889				1	137			
KY/CHRISTIAN COUNTY/2010.00	5	762	2	152	8	1181								
KY/CHRISTIAN COUNTY/2011.00	14	2155	2	298	5	808							1	68
KY/CHRISTIAN COUNTY/2012.00	3	366			4	500								
KY/CHRISTIAN COUNTY/2013.00	87	9574	5	393	47	4598				18	1295			
KY/CHRISTIAN COUNTY/2014.00	11	1608	3	278	12	1603				1	137			
TN/MONTGOMERY COUNTY/1001.00	22	3174	1	133	1	133								
TN/MONTGOMERY COUNTY/1002.00	10	1031	1	131	7	980								
TN/MONTGOMERY COUNTY/1003.00	44	6230	13	1391	34	4539	1	85		2	304			
TN/MONTGOMERY COUNTY/1004.00	14	2154			1	102				1	102			
TN/MONTGOMERY COUNTY/1005.00	26	3418	5	456	14	2041	2	230		2	116			
TN/MONTGOMERY COUNTY/1006.01	20	3770	8	1332	15	3298				2	206			
TN/MONTGOMERY COUNTY/1006.02	9	1079	9	1484	16	2055								
TN/MONTGOMERY COUNTY/1007.00	11	1993	7	1300	2	229								
TN/MONTGOMERY COUNTY/1008.00	4	621			6	1036								
TN/MONTGOMERY COUNTY/1009.00	12	779			3	220				2	75			
TN/MONTGOMERY COUNTY/1010.01	61	7938	1	105	24	2599	1	76		4	403			
TN/MONTGOMERY COUNTY/1010.02	40	5099	3	270	17	1697				3	216			
TN/MONTGOMERY COUNTY/1011.01	28	4039	2	307	11	1221								

ALL LOANS ON PROPERTY LOCATED IN MSA/MD 3/

MSA/MD: 17300 - CLARKSVILLE, TN-KY

CENSUS TRACT OR COUNTY NAME 1/ (STATE/COUNTY/TRACT NUMBER)	Loans on 1- to 4-Family and Manufactured Home Dwellings													
	Home Purchase Loans				Refinancings	Home Improvement Loans		Loans on Dwellings For 5 or More Families	Nonoccupant Loans From Columns A, B, C & D		Loans on Manufactured Home Dwellings From Columns A,B,C & D			
	FHA, FSA/RHS & VA		Conventional											
	A		B		C		D		E		F		G	
Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	
TN/MONTGOMERY COUNTY/1011.02	91	10696	6	658	37	3483					6	507		
TN/MONTGOMERY COUNTY/1011.03	64	10203	1	143	28	3309	2	207			1	80		
TN/MONTGOMERY COUNTY/1012.00	69	9846	3	450	27	3100	1	62			6	388		
TN/MONTGOMERY COUNTY/1013.01	299	44683	15	1570	110	14014					28	2840		
TN/MONTGOMERY COUNTY/1013.02	155	24003	8	930	55	6669	1	90			18	1542		
TN/MONTGOMERY COUNTY/1015.00	70	10712	9	1344	66	9647	1	125			3	294		
TN/MONTGOMERY COUNTY/1016.00	31	5529	4	636	36	4794	1	118			5	615		
TN/MONTGOMERY COUNTY/1017.00	33	5555	5	720	68	10786					2	324		
TN/MONTGOMERY COUNTY/1018.01	167	35723	46	9553	214	42482	1	193			12	1644	1	63
TN/MONTGOMERY COUNTY/1018.02	103	17915	23	3425	132	21914	2	361			3	271		
TN/MONTGOMERY COUNTY/1019.01	137	31620	26	4420	117	23665	2	208			3	534		
TN/MONTGOMERY COUNTY/1019.02	30	6217	7	1345	33	6434								
TN/MONTGOMERY COUNTY/1020.00	558	90034	48	6213	364	53834	4	590			78	10348		
KY/TRIGG COUNTY/SMALL	44	5129	15	2131	85	13630	4	445			19	2916	3	191
TN/STEWART COUNTY/SMALL	54	7634	10	1393	73	10213					9	1248		
MSA/MD (TOTAL)	2442	387056	301	44598	1766	269097	23	2790			234	26899	5	322
INVALID GEOGRAPHIC IDENTIFIERS 2/														

MSA/MD: 17300 - CLARKSVILLE, TN-KY

BORROWER OR CENSUS TRACT CHARACTERISTICS	FANNIE MAE		GINNIE MAE		FREDDIE MAC		FARMER MAC		PRIVATE SECURITIZATION		COMMERCIAL BANK, SAVINGS BANK, OR SAVING ASSOC		INSURANCE CO, CREDIT UNION, MORTGAGE BK, OR FINANCE CO		AFFILIATE INSTITUTION		OTHER PURCHASER	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
<b>BORROWER CHARACTERISTICS</b>																		
<b>RACE 5/</b>																		
AMERICAN INDIAN/ALASKA NATIVE	4	626	9	1111	2	158					3	416	5	633	1	84	10	1846
ASIAN	12	2220	29	4366	6	1253	1	44			7	1731	11	1651	1	189	15	2136
BLACK OR AFRICAN AMERICAN	22	2298	383	61501	18	1877					70	12906	160	26088	19	3134	116	18947
NATIVE HAWAIIAN/OTHER PACIFIC ISLND	2	265	18	2948							3	470	7	1148	1	150	7	1126
WHITE	549	78497	2115	319900	449	64676	31	3149			544	87658	1131	175448	213	32229	980	146139
2 OR MORE MINORITY RACES			2	214							1	108	1	168			3	471
JOINT (WHITE/MINORITY RACE)	13	2149	58	10536	6	1082					9	1419	16	2589	4	611	46	7734
RACE NOT AVAILABLE 6/	233	29570	944	151147	197	29670	3	489			49	7197	326	51693	285	43651	125	19170
<b>ETHNICITY 7/</b>																		
HISPANIC OR LATINO	9	797	139	19643	7	631	1	90			32	4754	44	6416	8	1008	56	7368
NOT HISPANIC OR LATINO	585	83815	2436	374759	478	68742	31	3103			602	99111	1267	197564	228	34794	1094	166330
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	10	1760	36	5476	2	282					8	1433	15	2635	2	223	25	4427
ETHNICITY NOT AVAILABLE 6/	231	29253	947	151845	191	29061	3	489			44	6607	331	52803	286	44023	127	19444
<b>MINORITY STATUS 8/</b>																		
WHITE NON-HISPANIC	529	75639	1943	295059	440	63672	30	3059			501	80708	1072	166087	198	30058	912	136084
OTHERS, INCLUDING HISPANIC	71	10000	655	103162	41	5283	2	134			130	22679	251	40222	36	5399	263	41980
<b>INCOME 9/</b>																		
LESS THAN 50% OF MSA/MD MEDIAN	28	2031	73	6104	29	2245	3	173			25	2370	43	3519	11	833	55	4223
50-79% OF MSA/MD MEDIAN	85	7697	594	69318	79	7827	7	451			119	14743	273	31604	43	4502	190	21110
80-99% OF MSA/MD MEDIAN	75	8239	556	75903	73	8661	7	591			118	16196	272	37597	28	3516	177	23223
100-119% OF MSA/MD MEDIAN	61	7013	355	54403	50	6128	4	318			78	12416	193	29732	47	6663	158	23104
120% OR MORE OF MSA/MD MEDIAN	403	67760	872	169173	277	47489	14	2149			270	53055	491	96664	97	18260	531	97159
INCOME NOT AVAILABLE 6/	183	22885	1108	176822	170	26366					76	13125	385	60302	298	46274	191	28750
<b>CENSUS TRACT CHARACTERISTICS 10/</b>																		
<b>RACIAL/ETHNIC COMPOSITION 11/</b>																		
LESS THAN 10% MINORITY	197	28395	399	63762	201	27758	4	486			112	17715	269	43673	99	14171	159	23652
10-19% MINORITY	299	47454	729	124634	280	45539	23	2362			190	34146	396	69790	134	23100	301	53077
20-49% MINORITY	326	38770	2390	359007	182	23730	6	730			375	58909	969	143659	282	41743	825	118674
50-79% MINORITY	12	932	39	4281	14	1639	2	104			9	1135	21	2183	8	995	17	2166
80-100% MINORITY	1	74	1	39	1	50							2	113	1	39		
<b>INCOME 12/ 13/</b>																		
LOW INCOME																		
MODERATE INCOME	19	1710	93	11385	18	1949	2	104			19	2525	44	4852	17	2143	34	4469
MIDDLE INCOME	462	56098	2595	374049	335	41410	25	2137			429	62115	1155	169353	349	47995	889	122912
UPPER INCOME	354	57817	870	166289	325	55357	8	1441			238	47265	458	85213	158	29910	379	70188
TOTAL 14/	835	115625	3558	551723	678	98716	35	3682			686	111905	1657	259418	524	80048	1302	197569

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PRICING INFORMATION	FANNIE MAE		GINNIE MAE		FREDDIE MAC		FARMER MAC		PRIVATE SECURITI-ZATION		COMMERCIAL BANK, SAVINGS BANK, OR SAVING ASSOC		INSURANCE CO, CREDIT UNION, MORTGAGE BK, OR FINANCE CO		AFFILIATE INSTITUTION		OTHER PURCHASER		
	FIRST LIEN #	JUNIOR LIEN #	FIRST LIEN #	JUNIOR LIEN #	FIRST LIEN #	JUNIOR LIEN #	FIRST LIEN #	JUNIOR LIEN #	FIRST LIEN #	JUNIOR LIEN #	FIRST LIEN #	JUNIOR LIEN #	FIRST LIEN #	JUNIOR LIEN #	FIRST LIEN #	JUNIOR LIEN #	FIRST LIEN #	JUNIOR LIEN #	
	NO REPORTED PRICING DATA 15/	437		899		377				35		671		1363	1	103		1223	4
REPORTED PRICING DATA	8		30		1						3		7		1		5		
PERCENTAGE POINTS ABOVE AVERAGE PRIME OFFER RATE: ONLY INCLUDES LOANS WITH APR ABOVE THE THRESHOLD 16/																			
1.50 - 1.99	7	NA	20	NA	1	NA	NA	NA	NA	NA	2	NA	4	NA	NA	NA	4	NA	
2.00 - 2.49		NA	6	NA		NA	NA	NA	NA	NA		NA		NA	NA	NA		NA	
2.50 - 2.99	1	NA	3	NA		NA	NA	NA	NA	NA	1	NA	2	NA	1	NA		NA	
3.00 - 3.49		NA	1	NA		NA	NA	NA	NA	NA		NA	1	NA		NA		NA	
3.50 - 4.49																		1	
4.50 - 5.49																			
5.50 - 6.49																			
6.50 OR MORE																			
MEAN	1.68		1.98		1.70						2.00		2.15		2.89		2.02		
MEDIAN	1.55		1.90		1.70						1.82		1.74		2.89		1.63		
HOEPA LOANS 17/			2																

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PRICING INFORMATION	FANNIE MAE		GINNIE MAE		FREDDIE MAC		FARMER MAC		PRIVATE SECURITI-ZATION		COMMERCIAL BANK, SAVINGS BANK, OR SAVING ASSOC		INSURANCE CO, CREDIT UNION, MORTGAGE BK, OR FINANCE CO		AFFILIATE INSTITUTION		OTHER PURCHASER		
	FIRST LIEN \$000's	JUNIOR LIEN \$000's	FIRST LIEN \$000's	JUNIOR LIEN \$000's	FIRST LIEN \$000's	JUNIOR LIEN \$000's	FIRST LIEN \$000's	JUNIOR LIEN \$000's	FIRST LIEN \$000's	JUNIOR LIEN \$000's	FIRST LIEN \$000's	JUNIOR LIEN \$000's	FIRST LIEN \$000's	JUNIOR LIEN \$000's	FIRST LIEN \$000's	JUNIOR LIEN \$000's	FIRST LIEN \$000's	JUNIOR LIEN \$000's	
	NO REPORTED PRICING DATA 15/	58946		131236		51881				3682		109625		213468	3	14963		185948	222
REPORTED PRICING DATA	764		4062		137						316		656		80		426		
PERCENTAGE POINTS ABOVE AVERAGE PRIME OFFER RATE: ONLY INCLUDES LOANS WITH APR ABOVE THE THRESHOLD 16/																			
1.50 - 1.99	619	NA	2746	NA	137	NA	NA	NA	NA	NA	260	NA	442	NA	NA	NA	301	NA	
2.00 - 2.49		NA	899	NA		NA	NA	NA	NA	NA		NA		NA	NA	NA		NA	
2.50 - 2.99	145	NA	365	NA		NA	NA	NA	NA	NA	56	NA	143	NA	80	NA		NA	
3.00 - 3.49		NA	52	NA		NA	NA	NA	NA	NA		NA	71	NA		NA		NA	
3.50 - 4.49																		125	
4.50 - 5.49																			
5.50 - 6.49																			
6.50 OR MORE																			
MEAN 30/	1.75		1.96		1.70						1.84		2.04		2.89		2.21		
MEDIAN 31/	1.55		1.89		1.70						1.82		1.74		2.89		1.67		
HOEPA LOANS 17/			129																

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RACE AND GENDER 5/ 18/ 19/	Applications Received 20/		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
AMERICAN INDIAN/ALASKA NATIVE (TOTAL)	16	2292	16	2292								
MALE	10	1509	10	1509								
FEMALE	4	555	4	555								
JOINT (MALE/FEMALE)	2	228	2	228								
ASIAN (TOTAL)	25	3959	23	3738			2	221				
MALE	17	2725	16	2618			1	107				
FEMALE	5	675	4	561			1	114				
JOINT (MALE/FEMALE)	3	559	3	559								
BLACK OR AFRICAN AMERICAN (TOTAL)	392	66125	309	53002	12	1967	36	5507	33	5367	2	282
MALE	200	31118	155	24365	9	1322	19	2819	15	2330	2	282
FEMALE	104	14459	80	11754	2	230	11	1195	11	1280		
JOINT (MALE/FEMALE)	88	20548	74	16883	1	415	6	1493	7	1757		
NATIVE HAWAIIAN/OTHER PACIFIC ISLND (TOTAL)	21	3556	15	2743			4	505			2	308
MALE	11	1869	8	1441			2	268			1	160
FEMALE	6	830	3	445			2	237			1	148
JOINT (MALE/FEMALE)	4	857	4	857								
WHITE (TOTAL)	2431	362596	1939	295917	47	6477	247	31924	181	26167	17	2111
MALE	1379	198991	1104	162771	24	3340	124	15275	116	16285	11	1320
FEMALE	333	42093	247	31564	12	1315	52	6705	21	2440	1	69
JOINT (MALE/FEMALE)	713	120352	582	100422	11	1822	71	9944	44	7442	5	722
2 OR MORE MINORITY RACES (TOTAL)	6	808	3	454	1	179	2	175				
MALE	3	367	2	276			1	91				
FEMALE	3	441	1	178	1	179	1	84				
JOINT (MALE/FEMALE)												
JOINT (WHITE/MINORITY RACE) (TOTAL)	48	8655	41	7651			3	477	4	527		
MALE												
FEMALE												
JOINT (MALE/FEMALE)	48	8655	41	7651			3	477	4	527		
RACE NOT AVAILABLE (TOTAL) 6/	229	34032	156	24317	6	982	36	4656	27	3580	4	497
MALE	66	9378	46	6651			13	1758	7	969		
FEMALE	19	2693	14	2196			2	191	2	254	1	52
JOINT (MALE/FEMALE)	49	7670	35	5891	1	146	8	1052	4	425	1	156

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ETHNICITY, GENDER AND INCOME 7/ 18/ 19/	Applications Received 20/		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
HISPANIC OR LATINO (TOTAL)	153	21457	129	18396	2	204	10	1448	10	1250	2	159
MALE	110	15238	94	13291	2	204	4	543	8	1041	2	159
FEMALE	23	2870	18	2123			4	649	1	98		
JOINT (MALE/FEMALE)	20	3349	17	2982			2	256	1	111		
NOT HISPANIC OR LATINO (TOTAL)	2728	417009	2173	339467	54	8029	279	37009	203	29962	19	2542
MALE	1500	220113	1190	178155	30	4339	145	18400	123	17616	12	1603
FEMALE	428	55811	321	43061	15	1724	59	7187	31	3622	2	217
JOINT (MALE/FEMALE)	796	140424	658	117590	9	1966	75	11422	49	8724	5	722
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO) (TOTAL)	48	8539	38	6937	1	134	3	491	6	977		
MALE	2	188	1	102					1	86		
FEMALE	1	114					1	114				
JOINT (MALE/FEMALE)	45	8237	37	6835	1	134	2	377	5	891		
ETHNICITY NOT AVAILABLE (TOTAL) 6/	239	35018	162	25314	9	1238	38	4517	26	3452	4	497
MALE	74	10418	56	8083	1	119	11	1375	6	841		
FEMALE	22	2951	14	2069			5	576	2	254	1	52
JOINT (MALE/FEMALE)	46	6859	29	5084	3	283	9	911	4	425	1	156
MINORITY STATUS 8/ 18/ 19/												
WHITE NON-HISPANIC (TOTAL)	2237	334137	1782	272029	42	6002	232	30093	166	24061	15	1952
MALE	1271	184366	1011	149771	22	3136	121	15019	108	15279	9	1161
FEMALE	307	38744	228	29241	12	1315	46	5777	20	2342	1	69
JOINT (MALE/FEMALE)	655	110366	539	92356	8	1551	65	9297	38	6440	5	722
OTHERS, INCLUDING HISPANIC (TOTAL)	685	111759	553	91922	16	2484	58	8604	52	8000	6	749
MALE	342	51391	276	42100	11	1526	27	3828	23	3336	5	601
FEMALE	143	19647	109	15539	3	409	18	2173	12	1378	1	148
JOINT (MALE/FEMALE)	200	40721	168	34283	2	549	13	2603	17	3286		
INCOME OF APPLICANTS 9/												
LESS THAN 50% OF MSA/MD MEDIAN	173	14588	98	8174	9	731	48	4318	16	1219	2	146
50-79% OF MSA/MD MEDIAN	790	91252	603	69946	20	2091	99	11254	64	7477	4	484
80-99% OF MSA/MD MEDIAN	700	95245	572	78807	9	1267	60	7479	55	7206	4	486
100-119% OF MSA/MD MEDIAN	476	72879	385	60218	11	1625	50	6734	25	3729	5	573
120% OR MORE OF MSA/MD MEDIAN	1003	204437	841	172567	15	3479	62	12149	79	15183	6	1059
INCOME NOT AVAILABLE 6/	26	3622	3	402	2	412	11	1531	6	827	4	450
TOTAL 14/	3168	482023	2502	390114	66	9605	330	43465	245	35641	25	3198

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RACE AND GENDER 5/ 18/ 19/	Applications Received 20/		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
AMERICAN INDIAN/ALASKA NATIVE (TOTAL)	10	730	7	612			1	32	2	86		
MALE	3	404	2	359					1	45		
FEMALE												
JOINT (MALE/FEMALE)	2	77	1	45			1	32				
ASIAN (TOTAL)	17	2516	12	1829	1	90	3	497	1	100		
MALE	8	998	7	908	1	90						
FEMALE	5	591	2	142			2	349	1	100		
JOINT (MALE/FEMALE)	4	927	3	779			1	148				
BLACK OR AFRICAN AMERICAN (TOTAL)	75	6002	47	3963	5	289	15	801	7	880	1	69
MALE	40	2718	26	1841	2	64	9	607	3	206		
FEMALE	15	798	9	577	1	33	4	119			1	69
JOINT (MALE/FEMALE)	19	2386	12	1545	2	192	2	75	3	574		
NATIVE HAWAIIAN/OTHER PACIFIC ISLND (TOTAL)	2	188	2	188								
MALE	2	188	2	188								
FEMALE												
JOINT (MALE/FEMALE)												
WHITE (TOTAL)	1002	123144	697	89819	57	8229	163	14752	74	9408	11	936
MALE	359	37068	249	28129	17	1040	55	4452	34	2966	4	481
FEMALE	177	16017	106	10701	14	638	43	3260	9	1092	5	326
JOINT (MALE/FEMALE)	462	69722	339	50752	26	6551	64	6940	31	5350	2	129
2 OR MORE MINORITY RACES (TOTAL)												
MALE												
FEMALE												
JOINT (MALE/FEMALE)												
JOINT (WHITE/MINORITY RACE) (TOTAL)	22	2558	14	1648	1	119	5	406	2	385		
MALE												
FEMALE												
JOINT (MALE/FEMALE)	22	2558	14	1648	1	119	5	406	2	385		
RACE NOT AVAILABLE (TOTAL) 6/	134	22787	98	17556	4	325	12	1386	17	3162	3	358
MALE	9	979	2	366	1	54	3	246	3	313		
FEMALE	3	314	2	155					1	159		
JOINT (MALE/FEMALE)	10	1766	5	1025			1	20	4	721		

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ETHNICITY, GENDER AND INCOME 7/ 18/ 19/	Applications Received 20/		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
HISPANIC OR LATINO (TOTAL)	18	2319	11	1463			5	636	2	220		
MALE	9	1417	6	857			3	560				
FEMALE	3	252	2	242			1	10				
JOINT (MALE/FEMALE)	6	650	3	364			1	66	2	220		
NOT HISPANIC OR LATINO (TOTAL)	1070	129659	750	95406	62	8668	168	14642	79	10013	11	930
MALE	396	39468	278	30475	19	1153	57	4142	38	3217	4	481
FEMALE	189	16899	113	11070	14	653	46	3589	10	1192	6	395
JOINT (MALE/FEMALE)	482	72960	357	53629	29	6862	64	6811	31	5604	1	54
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO) (TOTAL)	14	1318	8	1036			3	112	2	95	1	75
MALE												
FEMALE												
JOINT (MALE/FEMALE)	14	1318	8	1036			3	112	2	95	1	75
ETHNICITY NOT AVAILABLE (TOTAL) 6/	160	24629	108	17710	6	384	23	2484	20	3693	3	358
MALE	16	1470	4	459	2	95	7	603	3	313		
FEMALE	8	569	4	263	1	18	2	129	1	159		
JOINT (MALE/FEMALE)	17	2508	6	765			6	632	5	1111		
MINORITY STATUS 8/ 18/ 19/												
WHITE NON-HISPANIC (TOTAL)	956	118292	672	86962	55	8170	149	13206	70	9093	10	861
MALE	342	34972	239	26813	16	999	49	3713	34	2966	4	481
FEMALE	171	15591	103	10422	13	620	41	3131	9	1092	5	326
JOINT (MALE/FEMALE)	440	67397	328	49495	26	6551	58	6262	27	5035	1	54
OTHERS, INCLUDING HISPANIC (TOTAL)	150	15108	98	10516	7	498	27	2184	16	1766	2	144
MALE	61	5547	43	4153	3	154	11	989	4	251		
FEMALE	22	1631	13	961	1	33	6	468	1	100	1	69
JOINT (MALE/FEMALE)	61	7581	38	5194	3	311	10	727	9	1274	1	75
INCOME OF APPLICANTS 9/												
LESS THAN 50% OF MSA/MD MEDIAN	114	6675	43	2572	7	239	48	3058	14	684	2	122
50-79% OF MSA/MD MEDIAN	195	14819	106	8419	15	753	54	4014	18	1533	2	100
80-99% OF MSA/MD MEDIAN	143	12985	92	9351	17	898	22	1681	10	830	2	225
100-119% OF MSA/MD MEDIAN	104	10753	70	7222	5	262	20	2100	9	1169		
120% OR MORE OF MSA/MD MEDIAN	618	96660	490	73810	24	6900	52	6433	47	9028	5	489
INCOME NOT AVAILABLE 6/	88	16033	76	14241			3	588	5	777	4	427
TOTAL 14/	1262	157925	877	115615	68	9052	199	17874	103	14021	15	1363

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RACE AND GENDER 5/ 18/ 19/	Applications Received 20/		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
AMERICAN INDIAN/ALASKA NATIVE (TOTAL)	37	4459	13	1696	1	105	12	1508	7	667	4	483
MALE	22	2673	8	1131	1	105	8	841	2	227	3	369
FEMALE	6	660	3	351			1	132	1	63	1	114
JOINT (MALE/FEMALE)	8	1034	1	122			3	535	4	377		
ASIAN (TOTAL)	66	8808	39	5513	2	256	18	2384	5	507	2	148
MALE	27	3923	15	2254	1	93	5	972	5	507	1	97
FEMALE	25	2379	15	1538			9	790			1	51
JOINT (MALE/FEMALE)	14	2506	9	1721	1	163	4	622				
BLACK OR AFRICAN AMERICAN (TOTAL)	725	90424	290	38021	36	5539	260	28846	109	13931	30	4087
MALE	286	33345	110	12825	16	2310	96	10021	47	5916	17	2273
FEMALE	179	20376	71	9060	9	1327	72	6894	25	2880	2	215
JOINT (MALE/FEMALE)	259	36597	109	16136	10	1796	92	11931	37	5135	11	1599
NATIVE HAWAIIAN/OTHER PACIFIC ISLND (TOTAL)	22	3004	7	1218	1	127	7	626	7	1033		
MALE	11	1744	6	1104	1	127	1	66	3	447		
FEMALE	6	656	1	114			2	156	3	386		
JOINT (MALE/FEMALE)	5	604					4	404	1	200		
WHITE (TOTAL)	4839	658059	2731	376329	203	27228	1049	136148	682	93301	174	25053
MALE	1640	214032	841	113037	89	11331	345	43467	293	36560	72	9637
FEMALE	748	77758	387	40406	27	2830	221	22509	95	10336	18	1677
JOINT (MALE/FEMALE)	2437	364351	1501	222627	87	13067	477	69296	293	46395	79	12966
2 OR MORE MINORITY RACES (TOTAL)	5	488	2	293			2	150	1	45		
MALE	2	150					2	150				
FEMALE	1	148	1	148								
JOINT (MALE/FEMALE)	2	190	1	145					1	45		
JOINT (WHITE/MINORITY RACE) (TOTAL)	129	20183	77	12443	8	1135	23	3789	19	2652	2	164
MALE												
FEMALE	1	215							1	215		
JOINT (MALE/FEMALE)	128	19968	77	12443	8	1135	23	3789	18	2437	2	164
RACE NOT AVAILABLE (TOTAL) 6/	944	128104	361	48501	66	9112	267	35337	176	24039	74	11115
MALE	153	19451	53	7333	11	1348	41	4290	39	4993	9	1487
FEMALE	62	6482	20	2228	2	226	29	2826	9	997	2	205
JOINT (MALE/FEMALE)	151	21944	61	8509	10	1252	42	6658	30	4436	8	1089

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	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
HISPANIC OR LATINO (TOTAL)	201	24940	89	11042	16	2225	53	6063	35	4633	8	977
MALE	103	13003	46	5828	7	1068	26	3079	21	2693	3	335
FEMALE	33	3796	13	1254	3	302	6	735	8	1102	3	403
JOINT (MALE/FEMALE)	65	8141	30	3960	6	855	21	2249	6	838	2	239
NOT HISPANIC OR LATINO (TOTAL)	5559	750700	3022	417087	237	32259	1299	164153	793	107506	208	29695
MALE	1911	245700	940	125017	103	13198	434	52456	341	42349	93	12680
FEMALE	934	98585	464	50320	33	3855	302	29908	116	12818	19	1684
JOINT (MALE/FEMALE)	2698	404145	1615	241359	99	14910	557	80979	336	52339	91	14558
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO) (TOTAL)	87	12978	45	6536	4	773	22	3539	16	2130		
MALE	3	396	2	244			1	152				
FEMALE												
JOINT (MALE/FEMALE)	84	12582	43	6292	4	773	21	3387	16	2130		
ETHNICITY NOT AVAILABLE (TOTAL) 6/	920	124911	364	49349	60	8245	264	35033	162	21906	70	10378
MALE	124	16219	45	6595	9	1048	37	4120	27	3608	6	848
FEMALE	61	6293	21	2271	2	226	26	2664	10	957	2	175
JOINT (MALE/FEMALE)	157	22326	71	10092	7	875	46	6620	26	3718	7	1021
MINORITY STATUS 8/ 18/ 19/												
WHITE NON-HISPANIC (TOTAL)	4542	618412	2588	356700	185	24624	965	125358	637	87485	167	24245
MALE	1540	201155	793	106581	83	10559	319	40341	276	34347	69	9327
FEMALE	707	73230	372	38970	24	2528	210	21225	85	9089	16	1418
JOINT (MALE/FEMALE)	2283	342279	1421	210890	78	11537	431	63076	276	44049	77	12727
OTHERS, INCLUDING HISPANIC (TOTAL)	1236	160873	547	74958	66	9832	388	45781	191	24694	44	5608
MALE	441	53683	182	22864	25	3538	135	14819	76	9525	23	2937
FEMALE	247	27727	103	12354	12	1629	89	8575	37	4500	6	669
JOINT (MALE/FEMALE)	546	79265	261	39648	28	4559	164	22387	78	10669	15	2002
INCOME OF APPLICANTS 9/												
LESS THAN 50% OF MSA/MD MEDIAN	440	33826	140	9822	14	1038	203	16007	64	5403	19	1556
50-79% OF MSA/MD MEDIAN	894	84508	394	35599	34	2528	296	29346	139	13827	31	3208
80-99% OF MSA/MD MEDIAN	763	89426	363	41218	37	4340	200	23906	134	16061	29	3901
100-119% OF MSA/MD MEDIAN	658	80388	305	35943	23	3099	184	22660	110	13694	36	4992
120% OR MORE OF MSA/MD MEDIAN	2775	446488	1503	240207	119	19654	595	95635	430	69663	128	21329
INCOME NOT AVAILABLE 6/	1237	178893	815	121225	90	12843	160	21234	129	17527	43	6064
TOTAL 14/	6767	913529	3520	484014	317	43502	1638	208788	1006	136175	286	41050

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	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
AMERICAN INDIAN/ALASKA NATIVE (TOTAL)	3	216	1	85			1	110	1	21		
MALE	1	110					1	110				
FEMALE												
JOINT (MALE/FEMALE)	1	21							1	21		
ASIAN (TOTAL)	3	71	2	62	1	9						
MALE												
FEMALE	2	21	1	12	1	9						
JOINT (MALE/FEMALE)	1	50	1	50								
BLACK OR AFRICAN AMERICAN (TOTAL)	58	1453	23	587	3	57	27	543	4	208	1	58
MALE	26	592	11	238	1	7	12	180	1	109	1	58
FEMALE	17	447	6	159	1	10	8	199	2	79		
JOINT (MALE/FEMALE)	15	414	6	190	1	40	7	164	1	20		
NATIVE HAWAIIAN/OTHER PACIFIC ISLND (TOTAL)	2	45	1	21	1	24						
MALE	2	45	1	21	1	24						
FEMALE												
JOINT (MALE/FEMALE)												
WHITE (TOTAL)	548	20083	273	10496	24	1408	208	6541	40	1485	3	153
MALE	170	4897	76	2078	7	158	77	2202	9	374	1	85
FEMALE	112	2982	53	1512	5	348	52	1031	2	91		
JOINT (MALE/FEMALE)	265	12157	144	6906	12	902	78	3261	29	1020	2	68
2 OR MORE MINORITY RACES (TOTAL)												
MALE												
FEMALE												
JOINT (MALE/FEMALE)												
JOINT (WHITE/MINORITY RACE) (TOTAL)	9	823	4	349			3	96	2	378		
MALE												
FEMALE												
JOINT (MALE/FEMALE)	9	823	4	349			3	96	2	378		
RACE NOT AVAILABLE (TOTAL) 6/	56	1848	13	480			37	1032	5	206	1	130
MALE	5	231	1	30			3	48	1	153		
FEMALE	2	42					2	42				
JOINT (MALE/FEMALE)	8	247	4	60			3	178	1	9		

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	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
HISPANIC OR LATINO (TOTAL)	15	584	7	279	2	34	4	80	2	191		
MALE	7	243	5	204	1	24	1	15				
FEMALE	3	116					2	50	1	66		
JOINT (MALE/FEMALE)	5	225	2	75	1	10	1	15	1	125		
NOT HISPANIC OR LATINO (TOTAL)	599	21712	293	11013	27	1464	229	6970	46	2054	4	211
MALE	190	5539	83	2160	8	165	86	2435	11	636	2	143
FEMALE	129	3369	60	1683	7	367	59	1215	3	104		
JOINT (MALE/FEMALE)	280	12804	150	7170	12	932	84	3320	32	1314	2	68
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO) (TOTAL)	5	267	2	81			3	186				
MALE												
FEMALE												
JOINT (MALE/FEMALE)	5	267	2	81			3	186				
ETHNICITY NOT AVAILABLE (TOTAL) 6/	60	1976	15	707			40	1086	4	53	1	130
MALE	7	93	1	3			6	90				
FEMALE	1	7					1	7				
JOINT (MALE/FEMALE)	9	416	5	229			3	178	1	9		
MINORITY STATUS 8/ 18/ 19/												
WHITE NON-HISPANIC (TOTAL)	529	19122	263	9994	23	1398	202	6283	38	1294	3	153
MALE	164	4710	71	1901	7	158	76	2192	9	374	1	85
FEMALE	111	2916	53	1512	5	348	52	1031	1	25		
JOINT (MALE/FEMALE)	254	11496	139	6581	11	892	74	3060	28	895	2	68
OTHERS, INCLUDING HISPANIC (TOTAL)	93	3420	40	1464	6	100	37	1000	9	798	1	58
MALE	35	966	17	463	2	31	14	305	1	109	1	58
FEMALE	21	569	7	171	2	19	9	234	3	145		
JOINT (MALE/FEMALE)	36	1800	15	745	2	50	14	461	5	544		
INCOME OF APPLICANTS 9/												
LESS THAN 50% OF MSA/MD MEDIAN	84	1799	30	601	1	6	52	1175	1	17		
50-79% OF MSA/MD MEDIAN	123	3900	53	1837	7	310	54	1250	8	418	1	85
80-99% OF MSA/MD MEDIAN	97	2613	42	1026	4	189	47	1280	4	118		
100-119% OF MSA/MD MEDIAN	82	2377	38	913			32	936	11	470	1	58
120% OR MORE OF MSA/MD MEDIAN	280	13340	148	7420	17	993	87	3608	25	1121	3	198
INCOME NOT AVAILABLE 6/	13	510	6	283			4	73	3	154		
TOTAL 14/	679	24539	317	12080	29	1498	276	8322	52	2298	5	341

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	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
AMERICAN INDIAN/ALASKA NATIVE (TOTAL)												
MALE												
FEMALE												
JOINT (MALE/FEMALE)												
ASIAN (TOTAL)												
MALE												
FEMALE												
JOINT (MALE/FEMALE)												
BLACK OR AFRICAN AMERICAN (TOTAL)												
MALE												
FEMALE												
JOINT (MALE/FEMALE)												
NATIVE HAWAIIAN/OTHER PACIFIC ISLND (TOTAL)												
MALE												
FEMALE												
JOINT (MALE/FEMALE)												
WHITE (TOTAL)	14	9394	12	7844					2	1550		
MALE	5	6010	4	4760					1	1250		
FEMALE	1	175	1	175								
JOINT (MALE/FEMALE)	8	3209	7	2909					1	300		
2 OR MORE MINORITY RACES (TOTAL)												
MALE												
FEMALE												
JOINT (MALE/FEMALE)												
JOINT (WHITE/MINORITY RACE) (TOTAL)	3	960	3	960								
MALE												
FEMALE												
JOINT (MALE/FEMALE)	3	960	3	960								
RACE NOT AVAILABLE (TOTAL) 6/	21	36290	18	14540					3	21750		
MALE												
FEMALE												
JOINT (MALE/FEMALE)												

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	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
HISPANIC OR LATINO (TOTAL)												
MALE												
FEMALE												
JOINT (MALE/FEMALE)												
NOT HISPANIC OR LATINO (TOTAL)	16	9971	14	8421					2	1550		
MALE	5	6010	4	4760					1	1250		
FEMALE	1	175	1	175								
JOINT (MALE/FEMALE)	10	3786	9	3486					1	300		
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO) (TOTAL)												
MALE												
FEMALE												
JOINT (MALE/FEMALE)												
ETHNICITY NOT AVAILABLE (TOTAL) 6/	22	36673	19	14923					3	21750		
MALE												
FEMALE												
JOINT (MALE/FEMALE)	1	383	1	383								
MINORITY STATUS 8/ 18/ 19/												
WHITE NON-HISPANIC (TOTAL)	13	9011	11	7461					2	1550		
MALE	5	6010	4	4760					1	1250		
FEMALE	1	175	1	175								
JOINT (MALE/FEMALE)	7	2826	6	2526					1	300		
OTHERS, INCLUDING HISPANIC (TOTAL)	3	960	3	960								
MALE												
FEMALE												
JOINT (MALE/FEMALE)	3	960	3	960								
INCOME OF APPLICANTS 9/												
LESS THAN 50% OF MSA/MD MEDIAN												
50-79% OF MSA/MD MEDIAN												
80-99% OF MSA/MD MEDIAN												
100-119% OF MSA/MD MEDIAN												
120% OR MORE OF MSA/MD MEDIAN												
INCOME NOT AVAILABLE 6/	38	46644	33	23344					5	23300		
TOTAL 14/	38	46644	33	23344					5	23300		

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	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
AMERICAN INDIAN/ALASKA NATIVE (TOTAL)	3	139	2	98					1	41		
MALE	1	72	1	72								
FEMALE												
JOINT (MALE/FEMALE)												
ASIAN (TOTAL)	16	1841	13	1505	1	90	1	146	1	100		
MALE	9	1076	7	840	1	90	1	146				
FEMALE	6	715	5	615					1	100		
JOINT (MALE/FEMALE)	1	50	1	50								
BLACK OR AFRICAN AMERICAN (TOTAL)	107	8532	58	4425	6	766	29	2072	11	954	3	315
MALE	69	5009	39	2624	4	414	18	1135	6	575	2	261
FEMALE	12	1239	5	488	1	261	4	340	2	150		
JOINT (MALE/FEMALE)	26	2284	14	1313	1	91	7	597	3	229	1	54
NATIVE HAWAIIAN/OTHER PACIFIC ISLND (TOTAL)	5	724	3	532				98	1	94		
MALE	3	532	3	532								
FEMALE	1	94							1	94		
JOINT (MALE/FEMALE)	1	98						98				
WHITE (TOTAL)	788	86202	609	62337	29	7434	98	10193	45	5436	7	802
MALE	305	31562	225	24370	9	681	44	3742	24	2572	3	197
FEMALE	82	7242	60	4981	3	170	15	1344	3	686	1	61
JOINT (MALE/FEMALE)	401	47398	324	32986	17	6583	39	5107	18	2178	3	544
2 OR MORE MINORITY RACES (TOTAL)	2	149	1	148				1	1			
MALE	1	1						1	1			
FEMALE	1	148	1	148								
JOINT (MALE/FEMALE)												
JOINT (WHITE/MINORITY RACE) (TOTAL)	14	1882	9	1154				561	2	167		
MALE												
FEMALE												
JOINT (MALE/FEMALE)	14	1882	9	1154				561	2	167		
RACE NOT AVAILABLE (TOTAL) 6/	224	30047	171	25167	8	698	25	1986	16	1652	4	544
MALE	11	1024	3	305	2	127	4	335			2	257
FEMALE	3	217	1	84			2	133				
JOINT (MALE/FEMALE)	11	1019	8	794	1	78			2	147		

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HISPANIC OR LATINO (TOTAL)	32	3558	21	2647	2	261	5	297	4	353		
MALE	12	1668	10	1543			1	50	1	75		
FEMALE	5	336	3	202	1	99	1	35				
JOINT (MALE/FEMALE)	15	1554	8	902	1	162	3	212	3	278		
NOT HISPANIC OR LATINO (TOTAL)	890	94815	668	67082	33	7958	126	12538	53	6120	10	1117
MALE	375	36564	265	26895	14	1185	62	4954	29	3072	5	458
FEMALE	98	9137	68	6030	3	332	19	1684	7	1030	1	61
JOINT (MALE/FEMALE)	417	49114	335	34157	16	6441	45	5900	17	2018	4	598
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO) (TOTAL)	10	836	4	329	1	71	1	58	4	378		
MALE												
FEMALE												
JOINT (MALE/FEMALE)	10	836	4	329	1	71	1	58	4	378		
ETHNICITY NOT AVAILABLE (TOTAL) 6/	227	30307	173	25308	8	698	26	2164	16	1593	4	544
MALE	12	1044	3	305	2	127	5	355			2	257
FEMALE	2	182	1	84			1	98				
JOINT (MALE/FEMALE)	12	1227	9	909	1	78	1	193	1	47		
MINORITY STATUS 8/ 18/ 19/												
WHITE NON-HISPANIC (TOTAL)	746	81566	583	59200	26	7102	91	9600	39	4862	7	802
MALE	293	29905	216	22918	9	681	42	3612	23	2497	3	197
FEMALE	78	6941	57	4779	2	71	15	1344	3	686	1	61
JOINT (MALE/FEMALE)	375	44720	310	31503	15	6350	34	4644	13	1679	3	544
OTHERS, INCLUDING HISPANIC (TOTAL)	186	17413	110	10747	10	1188	41	3233	22	1930	3	315
MALE	94	8267	59	5520	5	504	21	1332	7	650	2	261
FEMALE	25	2532	14	1453	2	360	5	375	4	344		
JOINT (MALE/FEMALE)	65	6547	36	3748	3	324	15	1526	10	895	1	54
INCOME OF APPLICANTS 9/												
LESS THAN 50% OF MSA/MD MEDIAN	43	2235	25	1123	4	222	7	397	6	442	1	51
50-79% OF MSA/MD MEDIAN	62	4388	41	2745	2	171	14	1028	4	342	1	102
80-99% OF MSA/MD MEDIAN	65	4878	45	3449	3	177	12	890	5	362		
100-119% OF MSA/MD MEDIAN	65	4506	39	2887	2	35	17	1104	7	480		
120% OR MORE OF MSA/MD MEDIAN	629	71490	464	48213	24	7100	90	9858	43	5217	8	1102
INCOME NOT AVAILABLE 6/	295	42019	252	36949	9	1283	18	1780	12	1601	4	406
TOTAL 14/	1159	129516	866	95366	44	8988	158	15057	77	8444	14	1661

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	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
AMERICAN INDIAN/ALASKA NATIVE (TOTAL)	2	111	1	79			1	32				
MALE	1	79	1	79								
FEMALE												
JOINT (MALE/FEMALE)	1	32					1	32				
ASIAN (TOTAL)												
MALE												
FEMALE												
JOINT (MALE/FEMALE)												
BLACK OR AFRICAN AMERICAN (TOTAL)	15	831	6	229	4	172	5	430				
MALE	5	259	1	26	2	92	2	141				
FEMALE	7	309	4	187	1	33	2	89				
JOINT (MALE/FEMALE)	3	263	1	16	1	47	1	200				
NATIVE HAWAIIAN/OTHER PACIFIC ISLND (TOTAL)	1	350	1	350								
MALE	1	350	1	350								
FEMALE												
JOINT (MALE/FEMALE)												
WHITE (TOTAL)	251	15315	112	6520	40	1787	85	6129	11	738	3	141
MALE	97	5647	48	2589	12	505	27	1947	9	569	1	37
FEMALE	45	2045	19	793	10	346	16	906				
JOINT (MALE/FEMALE)	109	7623	45	3138	18	936	42	3276	2	169	2	104
2 OR MORE MINORITY RACES (TOTAL)												
MALE												
FEMALE												
JOINT (MALE/FEMALE)												
JOINT (WHITE/MINORITY RACE) (TOTAL)	5	344	1	58	1	119	3	167				
MALE												
FEMALE												
JOINT (MALE/FEMALE)	5	344	1	58	1	119	3	167				
RACE NOT AVAILABLE (TOTAL) 6/	18	1636	4	455	1	27	9	652	2	218	2	284
MALE	2	220	1	170			1	50				
FEMALE	1	11					1	11				
JOINT (MALE/FEMALE)	1	120	1	120								

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ETHNICITY, GENDER AND INCOME 7/ 18/ 19/	Applications Received 20/		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
HISPANIC OR LATINO (TOTAL)	3	113	3	113								
MALE	3	113	3	113								
FEMALE												
JOINT (MALE/FEMALE)												
NOT HISPANIC OR LATINO (TOTAL)	248	15420	112	6912	42	1973	81	5706	10	688	3	141
MALE	95	5780	47	2911	13	556	25	1707	9	569	1	37
FEMALE	46	1982	21	872	10	361	15	749				
JOINT (MALE/FEMALE)	107	7658	44	3129	19	1056	41	3250	1	119	2	104
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO) (TOTAL)	3	154	1	58			1	46	1	50		
MALE												
FEMALE												
JOINT (MALE/FEMALE)	3	154	1	58			1	46	1	50		
ETHNICITY NOT AVAILABLE (TOTAL) 6/	38	2900	9	608	4	132	21	1658	2	218	2	284
MALE	8	662	2	190	1	41	5	431				
FEMALE	7	383	2	108	1	18	4	257				
JOINT (MALE/FEMALE)	9	570	3	145	1	46	5	379				
MINORITY STATUS 8/ 18/ 19/												
WHITE NON-HISPANIC (TOTAL)	227	13839	104	6205	37	1682	73	5123	10	688	3	141
MALE	88	5092	44	2456	11	464	23	1566	9	569	1	37
FEMALE	40	1744	18	756	9	328	13	660				
JOINT (MALE/FEMALE)	99	7003	42	2993	17	890	37	2897	1	119	2	104
OTHERS, INCLUDING HISPANIC (TOTAL)	27	1799	12	829	5	291	9	629	1	50		
MALE	10	801	6	568	2	92	2	141				
FEMALE	7	309	4	187	1	33	2	89				
JOINT (MALE/FEMALE)	10	689	2	74	2	166	5	399	1	50		
INCOME OF APPLICANTS 9/												
LESS THAN 50% OF MSA/MD MEDIAN	61	2726	22	770	7	288	26	1399	4	177	2	92
50-79% OF MSA/MD MEDIAN	82	4631	37	2068	13	610	32	1953				
80-99% OF MSA/MD MEDIAN	45	2429	17	785	14	619	13	975	1	50		
100-119% OF MSA/MD MEDIAN	36	2884	14	833	4	139	13	1407	4	352	1	153
120% OR MORE OF MSA/MD MEDIAN	59	5099	33	2977	6	312	15	1341	3	289	2	180
INCOME NOT AVAILABLE 6/	9	818	2	258	2	137	4	335	1	88		
TOTAL 14/	292	18587	125	7691	46	2105	103	7410	13	956	5	425

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INCOME, RACE AND ETHNICITY	Applications Received 20/		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
LESS THAN 50% OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE												
ASIAN	3	272	2	158			1	114				
BLACK OR AFRICAN AMERICAN	27	2163	16	1401	2	179	6	393	3	190		
NATIVE HAWAIIAN/OTHER PACIFIC ISLND												
WHITE	133	11350	77	6395	7	552	35	3280	13	1029	1	94
2 OR MORE MINORITY RACES	1	84					1	84				
JOINT (WHITE/MINORITY RACE)												
RACE NOT AVAILABLE 6/	9	719	3	220			5	447			1	52
ETHNICITY 7/												
HISPANIC OR LATINO	12	1056	9	783	2	204	1	69				
NOT HISPANIC OR LATINO	144	12157	85	7098	5	362	38	3470	15	1133	1	94
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	4	374	2	174			1	114	1	86		
ETHNICITY NOT AVAILABLE 6/	13	1001	2	119	2	165	8	665			1	52
MINORITY STATUS 8/												
WHITE NON-HISPANIC	116	9980	68	5648	4	302	31	2993	12	943	1	94
OTHERS, INCLUDING HISPANIC	45	3758	28	2439	4	383	9	660	4	276		
50-79% OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	7	795	7	795								
ASIAN	4	495	3	388			1	107				
BLACK OR AFRICAN AMERICAN	82	9927	64	7678	3	337	6	750	9	1162		
NATIVE HAWAIIAN/OTHER PACIFIC ISLND	4	505					4	505				
WHITE	638	72951	496	57122	15	1581	73	8111	51	5806	3	331
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)	5	646	5	646								
RACE NOT AVAILABLE 6/	50	5933	28	3317	2	173	15	1781	4	509	1	153
ETHNICITY 7/												
HISPANIC OR LATINO	53	6285	42	5066			5	510	5	584	1	125
NOT HISPANIC OR LATINO	677	77999	524	60623	18	1918	78	8814	55	6438	2	206
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	4	408	3	334					1	74		
ETHNICITY NOT AVAILABLE 6/	56	6560	34	3923	2	173	16	1930	3	381	1	153
MINORITY STATUS 8/												
WHITE NON-HISPANIC	579	66062	449	51544	15	1581	67	7462	46	5269	2	206
OTHERS, INCLUDING HISPANIC	154	18501	121	14574	3	337	15	1766	14	1699	1	125

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INCOME, RACE AND ETHNICITY (CONTINUED)	Applications Received 20/		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
80-99% OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	3	401	3	401								
ASIAN	5	760	5	760								
BLACK OR AFRICAN AMERICAN	76	10421	61	8551	1	100	7	838	5	650	2	282
NATIVE HAWAIIAN/OTHER PACIFIC ISLND	2	241	2	241								
WHITE	552	75270	451	62346	5	594	48	6032	46	6094	2	204
2 OR MORE MINORITY RACES	3	378	1	108	1	179	1	91				
JOINT (WHITE/MINORITY RACE)	4	569	4	569								
RACE NOT AVAILABLE 6/	55	7205	45	5831	2	394	4	518	4	462		
ETHNICITY 7/												
HISPANIC OR LATINO	36	4867	31	4153			2	335	3	379		
NOT HISPANIC OR LATINO	601	81984	488	67470	7	873	54	6790	48	6365	4	486
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	7	925	6	853			1	72				
ETHNICITY NOT AVAILABLE 6/	56	7469	47	6331	2	394	3	282	4	462		
MINORITY STATUS 8/												
WHITE NON-HISPANIC	513	69796	417	57422	5	594	46	5861	43	5715	2	204
OTHERS, INCLUDING HISPANIC	129	17712	106	14786	2	279	11	1336	8	1029	2	282
100-119% OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	3	443	3	443								
ASIAN	3	516	3	516								
BLACK OR AFRICAN AMERICAN	60	9720	52	8457	3	439	4	624	1	200		
NATIVE HAWAIIAN/OTHER PACIFIC ISLND	1	151	1	151								
WHITE	369	56160	299	46559	8	1186	41	5375	16	2467	5	573
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)	10	1533	6	965			1	133	3	435		
RACE NOT AVAILABLE 6/	30	4356	21	3127			4	602	5	627		
ETHNICITY 7/												
HISPANIC OR LATINO	31	4974	29	4781			1	159			1	34
NOT HISPANIC OR LATINO	409	62746	329	51328	10	1534	46	6243	20	3102	4	539
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	7	1114	7	1114								
ETHNICITY NOT AVAILABLE 6/	29	4045	20	2995	1	91	3	332	5	627		
MINORITY STATUS 8/												
WHITE NON-HISPANIC	332	50466	265	41034	7	1095	40	5331	16	2467	4	539
OTHERS, INCLUDING HISPANIC	114	18281	100	16257	3	439	6	916	4	635	1	34

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INCOME, RACE AND ETHNICITY (CONTINUED)	Applications Received 20/		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
120% OR MORE OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	3	653	3	653								
ASIAN	10	1916	10	1916								
BLACK OR AFRICAN AMERICAN	144	33599	116	26915	3	912	12	2802	13	2970		
NATIVE HAWAIIAN/OTHER PACIFIC ISLND	13	2499	12	2351							1	148
WHITE	724	144554	615	123315	10	2152	42	7934	53	10398	4	755
2 OR MORE MINORITY RACES	2	346	2	346								
JOINT (WHITE/MINORITY RACE)	29	5907	26	5471			2	344	1	92		
RACE NOT AVAILABLE 6/	78	14963	57	11600	2	415	6	1069	12	1723	1	156
ETHNICITY 7/												
HISPANIC OR LATINO	20	3900	18	3613					2	287		
NOT HISPANIC OR LATINO	880	179866	746	152768	13	3064	55	10775	61	12356	5	903
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	25	5584	20	4462			1	305	4	817		
ETHNICITY NOT AVAILABLE 6/	78	15087	57	11724	2	415	6	1069	12	1723	1	156
MINORITY STATUS 8/												
WHITE NON-HISPANIC	684	136031	582	116201	10	2152	41	7629	47	9294	4	755
OTHERS, INCLUDING HISPANIC	237	52543	198	43866	3	912	15	3451	20	4166	1	148
TOTAL 14/	3168	482023	2502	390114	66	9605	330	43465	245	35641	25	3198

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INCOME, RACE AND ETHNICITY	Applications Received 20/		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
LESS THAN 50% OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE												
ASIAN	2	137	1	72			1	65				
BLACK OR AFRICAN AMERICAN	6	306	3	260			3	46				
NATIVE HAWAIIAN/OTHER PACIFIC ISLND												
WHITE	104	6187	39	2240	7	239	43	2927	13	659	2	122
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)												
RACE NOT AVAILABLE 6/	2	45					1	20	1	25		
ETHNICITY 7/												
HISPANIC OR LATINO	2	120	1	60					1	60		
NOT HISPANIC OR LATINO	103	6053	41	2484	6	198	43	2700	11	549	2	122
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	1	50							1	50		
ETHNICITY NOT AVAILABLE 6/	8	452	1	28	1	41	5	358	1	25		
MINORITY STATUS 8/												
WHITE NON-HISPANIC	95	5610	37	2152	6	198	39	2589	11	549	2	122
OTHERS, INCLUDING HISPANIC	11	613	5	392			4	111	2	110		
50-79% OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE												
ASIAN	2	172	2	172								
BLACK OR AFRICAN AMERICAN	18	1342	10	809	2	80	4	316	2	137		
NATIVE HAWAIIAN/OTHER PACIFIC ISLND	1	96	1	96								
WHITE	161	12254	89	7036	12	646	43	3203	15	1269	2	100
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)	3	269	1	112			2	157				
RACE NOT AVAILABLE 6/	10	686	3	194	1	27	5	338	1	127		
ETHNICITY 7/												
HISPANIC OR LATINO	2	74	1	23			1	51				
NOT HISPANIC OR LATINO	181	13908	102	8202	14	726	46	3474	17	1406	2	100
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	1	46					1	46				
ETHNICITY NOT AVAILABLE 6/	11	791	3	194	1	27	6	443	1	127		
MINORITY STATUS 8/												
WHITE NON-HISPANIC	158	12075	88	7013	12	646	41	3047	15	1269	2	100
OTHERS, INCLUDING HISPANIC	26	1953	15	1212	2	80	7	524	2	137		

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INCOME, RACE AND ETHNICITY (CONTINUED)	Applications Received 20/		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
80-99% OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	1	32					1	32				
ASIAN	2	368	1	220			1	148				
BLACK OR AFRICAN AMERICAN	5	259	4	227	1	32						
NATIVE HAWAIIAN/OTHER PACIFIC ISLND												
WHITE	126	11347	82	8398	15	812	20	1501	7	411	2	225
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)	1	200							1	200		
RACE NOT AVAILABLE 6/	8	779	5	506	1	54			2	219		
ETHNICITY 7/												
HISPANIC OR LATINO	3	259	3	259								
NOT HISPANIC OR LATINO	125	11589	82	8568	15	826	19	1434	8	611	1	150
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	3	227	2	152							1	75
ETHNICITY NOT AVAILABLE 6/	12	910	5	372	2	72	3	247	2	219		
MINORITY STATUS 8/												
WHITE NON-HISPANIC	115	10576	76	7967	14	794	17	1254	7	411	1	150
OTHERS, INCLUDING HISPANIC	15	1345	10	858	1	32	2	180	1	200	1	75
100-119% OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	1	41							1	41		
ASIAN	1	120	1	120								
BLACK OR AFRICAN AMERICAN	7	605	4	313			2	218	1	74		
NATIVE HAWAIIAN/OTHER PACIFIC ISLND												
WHITE	87	9155	60	6282	4	127	17	1811	6	935		
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)	2	250	2	250								
RACE NOT AVAILABLE 6/	6	582	3	257	1	135	1	71	1	119		
ETHNICITY 7/												
HISPANIC OR LATINO	1	178					1	178				
NOT HISPANIC OR LATINO	91	9528	64	6787	4	127	16	1605	7	1009		
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	1	70	1	70								
ETHNICITY NOT AVAILABLE 6/	11	977	5	365	1	135	3	317	2	160		
MINORITY STATUS 8/												
WHITE NON-HISPANIC	84	8872	59	6245	4	127	15	1565	6	935		
OTHERS, INCLUDING HISPANIC	11	1016	7	683			2	218	2	115		

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INCOME, RACE AND ETHNICITY (CONTINUED)	Applications Received 20/		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
120% OR MORE OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	8	657	7	612					1	45		
ASIAN	10	1719	7	1245	1	90	1	284	1	100		
BLACK OR AFRICAN AMERICAN	38	3421	26	2354	2	177	6	221	4	669		
NATIVE HAWAIIAN/OTHER PACIFIC ISLND	1	92	1	92								
WHITE	508	82543	414	64675	19	6405	39	5148	31	5826	5	489
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)	16	1839	11	1286	1	119	3	249	1	185		
RACE NOT AVAILABLE 6/	37	6389	24	3546	1	109	3	531	9	2203		
ETHNICITY 7/												
HISPANIC OR LATINO	10	1688	6	1121			3	407	1	160		
NOT HISPANIC OR LATINO	554	87016	448	68177	23	6791	44	5429	34	6130	5	489
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	8	925	5	814			2	66	1	45		
ETHNICITY NOT AVAILABLE 6/	46	7031	31	3698	1	109	3	531	11	2693		
MINORITY STATUS 8/												
WHITE NON-HISPANIC	489	79663	399	62397	19	6405	37	4751	29	5621	5	489
OTHERS, INCLUDING HISPANIC	86	10112	61	7371	4	386	12	1151	9	1204		
TOTAL 14/	1262	157925	877	115615	68	9052	199	17874	103	14021	15	1363

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INCOME, RACE AND ETHNICITY	Applications Received 20/		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
LESS THAN 50% OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	4	339	2	112	1	105			1	122		
ASIAN	5	326	1	81			2	122	1	72	1	51
BLACK OR AFRICAN AMERICAN	72	5068	14	721	1	91	44	3350	12	846	1	60
NATIVE HAWAIIAN/OTHER PACIFIC ISLND	1	65					1	65				
WHITE	306	23768	115	8315	9	629	124	9813	47	4113	11	898
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)												
RACE NOT AVAILABLE 6/	52	4260	8	593	3	213	32	2657	3	250	6	547
ETHNICITY 7/												
HISPANIC OR LATINO	10	874	1	72	1	72	8	730				
NOT HISPANIC OR LATINO	384	29330	131	9157	11	825	170	13272	59	5088	13	988
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	1	124					1	124				
ETHNICITY NOT AVAILABLE 6/	45	3498	8	593	2	141	24	1881	5	315	6	568
MINORITY STATUS 8/												
WHITE NON-HISPANIC	296	22949	114	8243	9	629	117	9196	46	4099	10	782
OTHERS, INCLUDING HISPANIC	92	6731	18	986	3	268	55	4326	14	1040	2	111
50-79% OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	7	604	1	75			2	146	3	246	1	137
ASIAN	15	1262	7	519	1	93	5	428	2	222		
BLACK OR AFRICAN AMERICAN	96	8717	28	2359	5	390	51	4605	8	972	4	391
NATIVE HAWAIIAN/OTHER PACIFIC ISLND	3	323	2	257			1	66				
WHITE	663	62051	325	29399	25	1695	189	18955	108	10527	16	1475
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)	6	733	3	344	1	86	1	239			1	64
RACE NOT AVAILABLE 6/	104	10818	28	2646	2	264	47	4907	18	1860	9	1141
ETHNICITY 7/												
HISPANIC OR LATINO	27	3045	9	841	1	105	9	1196	7	766	1	137
NOT HISPANIC OR LATINO	760	70310	354	31934	31	2159	238	22828	115	11379	22	2010
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	6	588	4	342			2	246				
ETHNICITY NOT AVAILABLE 6/	101	10565	27	2482	2	264	47	5076	17	1682	8	1061
MINORITY STATUS 8/												
WHITE NON-HISPANIC	626	58107	313	28344	24	1590	173	16925	100	9773	16	1475
OTHERS, INCLUDING HISPANIC	157	14977	52	4579	8	674	71	6926	20	2206	6	592

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INCOME, RACE AND ETHNICITY (CONTINUED)	Applications Received 20/		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
80-99% OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	4	372	2	229			1	59	1	84		
ASIAN	5	795	3	270			2	525				
BLACK OR AFRICAN AMERICAN	80	8401	31	3133	1	90	33	3358	14	1680	1	140
NATIVE HAWAIIAN/OTHER PACIFIC ISLND	1	115					1	115				
WHITE	568	66328	294	33556	27	3016	130	15649	92	10790	25	3317
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)	15	2093	7	962			4	711	4	420		
RACE NOT AVAILABLE 6/	90	11322	26	3068	9	1234	29	3489	23	3087	3	444
ETHNICITY 7/												
HISPANIC OR LATINO	29	2986	12	1157			6	536	10	1150	1	143
NOT HISPANIC OR LATINO	641	74833	325	37050	29	3138	162	19565	101	11906	24	3174
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	7	757	2	226			3	308	2	223		
ETHNICITY NOT AVAILABLE 6/	86	10850	24	2785	8	1202	29	3497	21	2782	4	584
MINORITY STATUS 8/												
WHITE NON-HISPANIC	534	62838	280	32268	26	2879	121	14670	83	9847	24	3174
OTHERS, INCLUDING HISPANIC	136	14950	56	5827	1	90	47	5338	30	3412	2	283
100-119% OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	6	613	1	86			2	195	2	215	1	117
ASIAN	4	562	2	288			2	274				
BLACK OR AFRICAN AMERICAN	66	7770	18	2002	4	304	27	2944	14	1998	3	522
NATIVE HAWAIIAN/OTHER PACIFIC ISLND	3	327	1	115					2	212		
WHITE	469	56264	254	29800	14	1733	123	15093	63	7626	15	2012
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)	16	1749	8	869			3	359	4	421	1	100
RACE NOT AVAILABLE 6/	94	13103	21	2783	5	1062	27	3795	25	3222	16	2241
ETHNICITY 7/												
HISPANIC OR LATINO	23	2732	9	1170	1	328	10	947	3	287		
NOT HISPANIC OR LATINO	543	65068	271	31580	18	2037	148	17847	87	10965	19	2639
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	9	1003	6	712			2	216	1	75		
ETHNICITY NOT AVAILABLE 6/	83	11585	19	2481	4	734	24	3650	19	2367	17	2353
MINORITY STATUS 8/												
WHITE NON-HISPANIC	442	53249	240	28052	14	1733	113	14105	61	7459	14	1900
OTHERS, INCLUDING HISPANIC	121	14057	43	5022	5	632	44	4651	24	3013	5	739

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INCOME, RACE AND ETHNICITY (CONTINUED)	Applications Received 20/		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
120% OR MORE OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	10	1629	4	643			5	871			1	115
ASIAN	22	4032	16	2981	1	163	5	888				
BLACK OR AFRICAN AMERICAN	254	35799	101	13688	11	1892	84	11896	46	6729	12	1594
NATIVE HAWAIIAN/OTHER PACIFIC ISLND	8	1259	1	350			4	380	3	529		
WHITE	2100	343880	1234	198688	78	14039	404	66973	300	49989	84	14191
2 OR MORE MINORITY RACES	3	339	1	145			1	149	1	45		
JOINT (WHITE/MINORITY RACE)	58	10425	32	5938	5	699	11	2132	10	1656		
RACE NOT AVAILABLE 6/	320	49125	114	17774	24	2861	81	12346	70	10715	31	5429
ETHNICITY 7/												
HISPANIC OR LATINO	59	8338	20	2753	6	787	17	2280	13	2163	3	355
NOT HISPANIC OR LATINO	2340	379906	1341	215135	89	15829	475	77236	339	55621	96	16085
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	46	7866	19	3086	3	651	13	2534	11	1595		
ETHNICITY NOT AVAILABLE 6/	330	50378	123	19233	21	2387	90	13585	67	10284	29	4889
MINORITY STATUS 8/												
WHITE NON-HISPANIC	1975	324323	1181	190218	70	12764	367	61333	276	46172	81	13836
OTHERS, INCLUDING HISPANIC	451	68526	191	29268	25	4029	137	20629	82	12536	16	2064
TOTAL 14/	6767	913529	3520	484014	317	43502	1638	208788	1006	136175	286	41050

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INCOME, RACE AND ETHNICITY	Applications Received 20/		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
LESS THAN 50% OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE												
ASIAN												
BLACK OR AFRICAN AMERICAN	11	163	5	96			6	67				
NATIVE HAWAIIAN/OTHER PACIFIC ISLND												
WHITE	63	1381	23	408	1	6	39	967				
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)												
RACE NOT AVAILABLE 6/	10	255	2	97			7	141	1	17		
ETHNICITY 7/												
HISPANIC OR LATINO	1	31	1	31								
NOT HISPANIC OR LATINO	72	1496	27	473	1	6	44	1017				
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)												
ETHNICITY NOT AVAILABLE 6/	11	272	2	97			8	158	1	17		
MINORITY STATUS 8/												
WHITE NON-HISPANIC	62	1350	22	377	1	6	39	967				
OTHERS, INCLUDING HISPANIC	12	194	6	127			6	67				
50-79% OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE												
ASIAN	1	9			1	9						
BLACK OR AFRICAN AMERICAN	11	380	6	188			3	113	2	79		
NATIVE HAWAIIAN/OTHER PACIFIC ISLND												
WHITE	98	3256	44	1552	6	301	41	979	6	339	1	85
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)	2	66					2	66				
RACE NOT AVAILABLE 6/	11	189	3	97			8	92				
ETHNICITY 7/												
HISPANIC OR LATINO	1	125							1	125		
NOT HISPANIC OR LATINO	110	3539	50	1740	7	310	45	1111	7	293	1	85
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)												
ETHNICITY NOT AVAILABLE 6/	12	236	3	97			9	139				
MINORITY STATUS 8/												
WHITE NON-HISPANIC	96	3084	44	1552	6	301	40	932	5	214	1	85
OTHERS, INCLUDING HISPANIC	15	580	6	188	1	9	5	179	3	204		

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INCOME, RACE AND ETHNICITY (CONTINUED)	Applications Received 20/		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
80-99% OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE												
ASIAN												
BLACK OR AFRICAN AMERICAN	9	140	1	17	1	10	7	113				
NATIVE HAWAIIAN/OTHER PACIFIC ISLND	2	45	1	21	1	24						
WHITE	78	2183	39	978	2	155	33	932	4	118		
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)	1	30					1	30				
RACE NOT AVAILABLE 6/	7	215	1	10			6	205				
ETHNICITY 7/												
HISPANIC OR LATINO	5	180	2	75	1	24	1	15	1	66		
NOT HISPANIC OR LATINO	82	2044	39	873	3	165	37	954	3	52		
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	2	159	1	78			1	81				
ETHNICITY NOT AVAILABLE 6/	8	230					8	230				
MINORITY STATUS 8/												
WHITE NON-HISPANIC	73	1883	37	835	2	155	31	841	3	52		
OTHERS, INCLUDING HISPANIC	18	530	5	191	2	34	10	239	1	66		
100-119% OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE												
ASIAN												
BLACK OR AFRICAN AMERICAN	7	204	2	8			4	138			1	58
NATIVE HAWAIIAN/OTHER PACIFIC ISLND												
WHITE	68	1894	34	880			25	708	9	306		
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)	2	164	1	21					1	143		
RACE NOT AVAILABLE 6/	5	115	1	4			3	90	1	21		
ETHNICITY 7/												
HISPANIC OR LATINO	1	35					1	35				
NOT HISPANIC OR LATINO	76	2259	36	906			29	846	10	449	1	58
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)												
ETHNICITY NOT AVAILABLE 6/	5	83	2	7			2	55	1	21		
MINORITY STATUS 8/												
WHITE NON-HISPANIC	67	1891	33	877			25	708	9	306		
OTHERS, INCLUDING HISPANIC	10	403	3	29			5	173	1	143	1	58

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INCOME, RACE AND ETHNICITY (CONTINUED)	Applications Received 20/		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
120% OR MORE OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	3	216	1	85			1	110	1	21		
ASIAN	2	62	2	62								
BLACK OR AFRICAN AMERICAN	20	566	9	278	2	47	7	112	2	129		
NATIVE HAWAIIAN/OTHER PACIFIC ISLND												
WHITE	230	11049	129	6585	15	946	66	2882	18	568	2	68
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)	4	563	3	328					1	235		
RACE NOT AVAILABLE 6/	21	884	4	82			13	504	3	168	1	130
ETHNICITY 7/												
HISPANIC OR LATINO	7	213	4	173	1	10	2	30				
NOT HISPANIC OR LATINO	248	12054	137	6928	16	983	70	2969	23	1106	2	68
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	3	108	1	3			2	105				
ETHNICITY NOT AVAILABLE 6/	22	965	6	316			13	504	2	15	1	130
MINORITY STATUS 8/												
WHITE NON-HISPANIC	220	10594	123	6260	14	936	63	2762	18	568	2	68
OTHERS, INCLUDING HISPANIC	38	1713	20	929	3	57	11	342	4	385		
TOTAL 14/	679	24539	317	12080	29	1498	276	8322	52	2298	5	341

AGGREGATE TABLE 5-6: DISPOSITION OF APPLICATIONS FROM NONOCCUPANTS FOR HOME-PURCHASE, HOME IMPROVEMENT, OR REFINANCING LOANS,  
1- TO 4-FAMILY AND MANUFACTURED HOME DWELLINGS, BY INCOME, RACE AND ETHNICITY OF APPLICANT, 2010

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INCOME, RACE AND ETHNICITY	Applications Received 20/		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
LESS THAN 50% OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	1	72	1	72								
ASIAN												
BLACK OR AFRICAN AMERICAN	6	346	3	89	1	91			2	166		
NATIVE HAWAIIAN/OTHER PACIFIC ISLND												
WHITE	36	1817	21	962	3	131	7	397	4	276	1	51
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)												
RACE NOT AVAILABLE 6/												
ETHNICITY 7/												
HISPANIC OR LATINO	2	120	1	60					1	60		
NOT HISPANIC OR LATINO	41	2115	24	1063	4	222	7	397	5	382	1	51
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)												
ETHNICITY NOT AVAILABLE 6/												
MINORITY STATUS 8/												
WHITE NON-HISPANIC	34	1697	20	902	3	131	7	397	3	216	1	51
OTHERS, INCLUDING HISPANIC	9	538	5	221	1	91			3	226		
50-79% OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE												
ASIAN												
BLACK OR AFRICAN AMERICAN	6	316	1	83			3	151	2	82		
NATIVE HAWAIIAN/OTHER PACIFIC ISLND												
WHITE	49	3662	38	2584	2	171	7	647	2	260		
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)												
RACE NOT AVAILABLE 6/	7	410	2	78			4	230			1	102
ETHNICITY 7/												
HISPANIC OR LATINO												
NOT HISPANIC OR LATINO	55	3978	39	2667	2	171	10	798	4	342		
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)												
ETHNICITY NOT AVAILABLE 6/	7	410	2	78			4	230			1	102
MINORITY STATUS 8/												
WHITE NON-HISPANIC	49	3662	38	2584	2	171	7	647	2	260		
OTHERS, INCLUDING HISPANIC	6	316	1	83			3	151	2	82		

AGGREGATE TABLE 5-6: DISPOSITION OF APPLICATIONS FROM NONOCCUPANTS FOR HOME-PURCHASE, HOME IMPROVEMENT, OR REFINANCING LOANS,  
 1- TO 4-FAMILY AND MANUFACTURED HOME DWELLINGS, BY INCOME, RACE AND ETHNICITY OF APPLICANT, 2010

MSA/MD: 17300 - CLARKSVILLE, TN-KY

INCOME, RACE AND ETHNICITY (CONTINUED)	Applications Received 20/		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
80-99% OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE												
ASIAN												
BLACK OR AFRICAN AMERICAN	4	188	2	33			1	20	1	135		
NATIVE HAWAIIAN/OTHER PACIFIC ISLND												
WHITE	55	4209	41	3225	2	123	8	634	4	227		
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)												
RACE NOT AVAILABLE 6/	6	481	2	191	1	54	3	236				
ETHNICITY 7/												
HISPANIC OR LATINO	4	227	3	152					1	75		
NOT HISPANIC OR LATINO	53	4151	40	3166	2	123	8	634	3	228		
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	2	136	1	77					1	59		
ETHNICITY NOT AVAILABLE 6/	6	364	1	54	1	54	4	256				
MINORITY STATUS 8/												
WHITE NON-HISPANIC	49	3846	37	2996	2	123	8	634	2	93		
OTHERS, INCLUDING HISPANIC	10	551	6	262			1	20	3	269		
100-119% OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	1	41							1	41		
ASIAN												
BLACK OR AFRICAN AMERICAN	3	128					3	128				
NATIVE HAWAIIAN/OTHER PACIFIC ISLND												
WHITE	54	3865	37	2709	2	35	12	888	3	233		
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)	1	75							1	75		
RACE NOT AVAILABLE 6/	6	397	2	178			2	88	2	131		
ETHNICITY 7/												
HISPANIC OR LATINO	2	107					2	107				
NOT HISPANIC OR LATINO	56	3921	37	2709	2	35	14	944	3	233		
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	1	75							1	75		
ETHNICITY NOT AVAILABLE 6/	6	403	2	178			1	53	3	172		
MINORITY STATUS 8/												
WHITE NON-HISPANIC	53	3793	37	2709	2	35	11	816	3	233		
OTHERS, INCLUDING HISPANIC	7	351					5	235	2	116		

AGGREGATE TABLE 5-6: DISPOSITION OF APPLICATIONS FROM NONOCCUPANTS FOR HOME-PURCHASE, HOME IMPROVEMENT, OR REFINANCING LOANS,  
1- TO 4-FAMILY AND MANUFACTURED HOME DWELLINGS, BY INCOME, RACE AND ETHNICITY OF APPLICANT, 2010

MSA/MD: 17300 - CLARKSVILLE, TN-KY

INCOME, RACE AND ETHNICITY (CONTINUED)	Applications Received 20/		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
120% OR MORE OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	1	26	1	26								
ASIAN	10	871	8	681	1	90			1	100		
BLACK OR AFRICAN AMERICAN	70	5320	42	2948	2	84	20	1603	5	489	1	196
NATIVE HAWAIIAN/OTHER PACIFIC ISLND	4	634	2	442			1	98	1	94		
WHITE	486	58878	384	41549	15	6423	54	6585	27	3570	6	751
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)	9	1135	5	482			3	561	1	92		
RACE NOT AVAILABLE 6/	49	4626	22	2085	6	503	12	1011	8	872	1	155
ETHNICITY 7/												
HISPANIC OR LATINO	13	2018	6	1349	2	261	3	190	2	218		
NOT HISPANIC OR LATINO	559	64125	431	44442	15	6265	73	8406	33	4065	7	947
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	6	543	3	252	1	71	1	58	1	162		
ETHNICITY NOT AVAILABLE 6/	51	4804	24	2170	6	503	13	1204	7	772	1	155
MINORITY STATUS 8/												
WHITE NON-HISPANIC	464	55985	374	39889	12	6091	48	6064	24	3190	6	751
OTHERS, INCLUDING HISPANIC	113	10547	67	6180	6	506	28	2510	11	1155	1	196
TOTAL 14/	1159	129516	866	95366	44	8988	158	15057	77	8444	14	1661

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INCOME, RACE AND ETHNICITY	Applications Received 20/		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
LESS THAN 50% OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE												
ASIAN												
BLACK OR AFRICAN AMERICAN	4	218			1	60	3	158				
NATIVE HAWAIIAN/OTHER PACIFIC ISLND												
WHITE	55	2405	22	770	6	228	21	1138	4	177	2	92
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)												
RACE NOT AVAILABLE 6/	2	103					2	103				
ETHNICITY 7/												
HISPANIC OR LATINO												
NOT HISPANIC OR LATINO	51	2197	21	742	5	201	20	1035	3	127	2	92
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	1	50							1	50		
ETHNICITY NOT AVAILABLE 6/	9	479	1	28	2	87	6	364				
MINORITY STATUS 8/												
WHITE NON-HISPANIC	47	1979	21	742	4	141	17	877	3	127	2	92
OTHERS, INCLUDING HISPANIC	5	268			1	60	3	158	1	50		
50-79% OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE												
ASIAN												
BLACK OR AFRICAN AMERICAN	6	268	3	116	2	80	1	72				
NATIVE HAWAIIAN/OTHER PACIFIC ISLND												
WHITE	69	4022	33	1844	10	503	26	1675				
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)	2	52					2	52				
RACE NOT AVAILABLE 6/	5	289	1	108	1	27	3	154				
ETHNICITY 7/												
HISPANIC OR LATINO	1	23	1	23								
NOT HISPANIC OR LATINO	73	4051	35	1937	12	583	26	1531				
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	1	46					1	46				
ETHNICITY NOT AVAILABLE 6/	7	511	1	108	1	27	5	376				
MINORITY STATUS 8/												
WHITE NON-HISPANIC	66	3777	32	1821	10	503	24	1453				
OTHERS, INCLUDING HISPANIC	9	343	4	139	2	80	3	124				

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INCOME, RACE AND ETHNICITY (CONTINUED)	Applications Received 20/		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
80-99% OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	1	32					1	32				
ASIAN												
BLACK OR AFRICAN AMERICAN	3	74	2	42	1	32						
NATIVE HAWAIIAN/OTHER PACIFIC ISLND												
WHITE	39	2073	15	743	13	587	10	693	1	50		
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)												
RACE NOT AVAILABLE 6/	2	250					2	250				
ETHNICITY 7/												
HISPANIC OR LATINO	1	82	1	82								
NOT HISPANIC OR LATINO	37	1812	15	683	13	601	8	478	1	50		
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)												
ETHNICITY NOT AVAILABLE 6/	7	535	1	20	1	18	5	497				
MINORITY STATUS 8/												
WHITE NON-HISPANIC	33	1706	13	641	12	569	7	446	1	50		
OTHERS, INCLUDING HISPANIC	5	188	3	124	1	32	1	32				
100-119% OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE												
ASIAN												
BLACK OR AFRICAN AMERICAN	2	271	1	71			1	200				
NATIVE HAWAIIAN/OTHER PACIFIC ISLND												
WHITE	31	2301	13	762	4	139	11	1136	3	264		
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)												
RACE NOT AVAILABLE 6/	3	312					1	71	1	88	1	153
ETHNICITY 7/												
HISPANIC OR LATINO												
NOT HISPANIC OR LATINO	29	2239	12	725	4	139	10	1111	3	264		
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)												
ETHNICITY NOT AVAILABLE 6/	7	645	2	108			3	296	1	88	1	153
MINORITY STATUS 8/												
WHITE NON-HISPANIC	28	2039	12	725	4	139	9	911	3	264		
OTHERS, INCLUDING HISPANIC	2	271	1	71			1	200				

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INCOME, RACE AND ETHNICITY (CONTINUED)	Applications Received 20/		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
120% OR MORE OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	1	79	1	79								
ASIAN												
BLACK OR AFRICAN AMERICAN												
NATIVE HAWAIIAN/OTHER PACIFIC ISLND	1	350	1	350								
WHITE	50	3940	28	2313	5	193	14	1226	2	159	1	49
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)	3	292	1	58	1	119	1	115				
RACE NOT AVAILABLE 6/	4	438	2	177					1	130	1	131
ETHNICITY 7/												
HISPANIC OR LATINO	1	8	1	8								
NOT HISPANIC OR LATINO	52	4598	28	2737	6	312	15	1341	2	159	1	49
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	1	58	1	58								
ETHNICITY NOT AVAILABLE 6/	5	435	3	174					1	130	1	131
MINORITY STATUS 8/												
WHITE NON-HISPANIC	47	3815	25	2188	5	193	14	1226	2	159	1	49
OTHERS, INCLUDING HISPANIC	6	729	4	495	1	119	1	115				
TOTAL 14/	292	18587	125	7691	46	2105	103	7410	13	956	5	425

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TYPE OF CENSUS TRACT 10/	Applications Received 20/		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
RACIAL/ETHNIC COMPOSITION 11/												
LESS THAN 10% MINORITY	303	50015	222	37555	11	1774	40	5460	27	4687	3	539
10-19% MINORITY	559	96571	442	78889	11	1552	54	7535	47	7865	5	730
20-49% MINORITY	2099	311165	1708	257545	41	6088	190	25903	146	20074	14	1555
50-79% MINORITY	49	5292	35	4120	1	71	7	566	4	290	2	245
80-100% MINORITY	2	65	1	39			1	26				
INCOME CHARACTERISTICS 12/ 13/												
LOW INCOME												
MODERATE INCOME	106	12752	84	10774	2	191	10	824	7	684	3	279
MIDDLE INCOME	2199	315124	1754	255975	41	5215	228	30407	160	21426	16	2101
UPPER INCOME	707	135232	570	111399	21	4079	54	8259	57	10806	5	689
INCOME & RACIAL/ETHNIC COMP 11/ 12/ 13/												
LOW INCOME												
LESS THAN 10% MINORITY												
10-19% MINORITY												
20-49% MINORITY												
50-79% MINORITY												
80-100% MINORITY												
MODERATE INCOME												
LESS THAN 10% MINORITY												
10-19% MINORITY												
20-49% MINORITY	55	7395	48	6615	1	120	2	232	3	394	1	34
50-79% MINORITY	49	5292	35	4120	1	71	7	566	4	290	2	245
80-100% MINORITY	2	65	1	39			1	26				
MIDDLE INCOME												
LESS THAN 10% MINORITY												
10-19% MINORITY	141	21477	96	14837	2	361	27	3498	14	2460	2	321
10-19% MINORITY	161	22327	120	17411	3	225	23	2728	12	1583	3	380
20-49% MINORITY	1897	271320	1538	223727	36	4629	178	24181	134	17383	11	1400
50-79% MINORITY												
80-100% MINORITY												
UPPER INCOME												
LESS THAN 10% MINORITY												
10-19% MINORITY	162	28538	126	22718	9	1413	13	1962	13	2227	1	218
10-19% MINORITY	398	74244	322	61478	8	1327	31	4807	35	6282	2	350
20-49% MINORITY	147	32450	122	27203	4	1339	10	1490	9	2297	2	121
50-79% MINORITY												
80-100% MINORITY												
SMALL COUNTY	156	18915	94	11966	2	120	38	3975	21	2725	1	129
ALL OTHER TRACTS 21/												
TOTAL 14/	3168	482023	2502	390114	66	9605	330	43465	245	35641	25	3198

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TYPE OF CENSUS TRACT 10/	Applications Received 20/		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
RACIAL/ETHNIC COMPOSITION 11/												
LESS THAN 10% MINORITY	246	31562	169	24262	9	672	46	4076	17	2168	5	384
10-19% MINORITY	258	41317	189	26771	9	5240	33	4502	24	4499	3	305
20-49% MINORITY	479	58928	343	46090	34	2018	54	4409	45	6139	3	272
50-79% MINORITY	59	4736	34	3274	5	179	16	1144	4	139		
80-100% MINORITY	7	297	5	205			2	92				
INCOME CHARACTERISTICS 12/ 13/												
LOW INCOME												
MODERATE INCOME	93	7042	55	4635	5	179	26	1847	7	381		
MIDDLE INCOME	549	65019	392	50225	23	1523	75	6652	51	5993	8	626
UPPER INCOME	407	64779	293	45742	29	6407	50	5724	32	6571	3	335
INCOME & RACIAL/ETHNIC COMP 11/ 12/ 13/												
LOW INCOME												
LESS THAN 10% MINORITY												
10-19% MINORITY												
20-49% MINORITY												
50-79% MINORITY												
80-100% MINORITY												
MODERATE INCOME												
LESS THAN 10% MINORITY												
10-19% MINORITY												
20-49% MINORITY	27	2009	16	1156			8	611	3	242		
50-79% MINORITY	59	4736	34	3274	5	179	16	1144	4	139		
80-100% MINORITY	7	297	5	205			2	92				
MIDDLE INCOME												
LESS THAN 10% MINORITY	144	15732	91	11522	6	364	33	2730	10	882	4	234
10-19% MINORITY	56	5913	43	4200	2	136	6	1006	4	451	1	120
20-49% MINORITY	349	43374	258	34503	15	1023	36	2916	37	4660	3	272
50-79% MINORITY												
80-100% MINORITY												
UPPER INCOME												
LESS THAN 10% MINORITY	102	15830	78	12740	3	308	13	1346	7	1286	1	150
10-19% MINORITY	202	35404	146	22571	7	5104	27	3496	20	4048	2	185
20-49% MINORITY	103	13545	69	10431	19	995	10	882	5	1237		
50-79% MINORITY												
80-100% MINORITY												
SMALL COUNTY	213	21085	137	15013	11	943	48	3651	13	1076	4	402
ALL OTHER TRACTS 21/												
TOTAL 14/	1262	157925	877	115615	68	9052	199	17874	103	14021	15	1363

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TYPE OF CENSUS TRACT 10/	Applications Received 20/		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
RACIAL/ETHNIC COMPOSITION 11/												
LESS THAN 10% MINORITY	1204	169129	679	92336	56	7875	284	42339	149	21196	36	5383
10-19% MINORITY	1528	236199	888	139141	65	10367	307	44340	201	31676	67	10675
20-49% MINORITY	3177	398980	1503	194453	164	20714	812	93804	550	69842	148	20167
50-79% MINORITY	176	14914	93	7554	7	686	57	4982	16	1473	3	219
80-100% MINORITY	31	1507	11	517			15	700	4	212	1	78
INCOME CHARACTERISTICS 12/ 13/												
LOW INCOME												
MODERATE INCOME	290	23053	143	11112	8	755	102	7908	32	2831	5	447
MIDDLE INCOME	3762	458769	1832	223899	193	23599	956	112331	615	76247	166	22693
UPPER INCOME	2064	338907	1199	198990	91	15288	417	65926	273	45321	84	13382
INCOME & RACIAL/ETHNIC COMP 11/ 12/ 13/												
LOW INCOME												
LESS THAN 10% MINORITY												
10-19% MINORITY												
20-49% MINORITY												
50-79% MINORITY												
80-100% MINORITY												
MODERATE INCOME												
LESS THAN 10% MINORITY												
10-19% MINORITY												
20-49% MINORITY	83	6632	39	3041	1	69	30	2226	12	1146	1	150
50-79% MINORITY	176	14914	93	7554	7	686	57	4982	16	1473	3	219
80-100% MINORITY	31	1507	11	517			15	700	4	212	1	78
MIDDLE INCOME												
LESS THAN 10% MINORITY	617	77271	353	42918	30	3469	146	19244	70	8777	18	2863
10-19% MINORITY	346	41410	187	21626	12	1669	87	10520	48	6140	12	1455
20-49% MINORITY	2799	340088	1292	159355	151	18461	723	82567	497	61330	136	18375
50-79% MINORITY												
80-100% MINORITY												
UPPER INCOME												
LESS THAN 10% MINORITY	587	91858	326	49418	26	4406	138	23095	79	12419	18	2520
10-19% MINORITY	1182	194789	701	117515	53	8698	220	33820	153	25536	55	9220
20-49% MINORITY	295	52260	172	32057	12	2184	59	9011	41	7366	11	1642
50-79% MINORITY												
80-100% MINORITY												
SMALL COUNTY	651	92800	346	50013	25	3860	163	22623	86	11776	31	4528
ALL OTHER TRACTS 21/												
TOTAL 14/	6767	913529	3520	484014	317	43502	1638	208788	1006	136175	286	41050

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TYPE OF CENSUS TRACT 10/	Applications Received 20/		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
RACIAL/ETHNIC COMPOSITION 11/												
LESS THAN 10% MINORITY	158	6984	89	3936	6	333	52	2112	10	518	1	85
10-19% MINORITY	133	5136	64	2746	5	347	52	1506	10	354	2	183
20-49% MINORITY	266	8945	99	3800	8	204	131	3571	28	1370		
50-79% MINORITY	37	912	15	407	4	73	16	369	1	5	1	58
80-100% MINORITY	3	51					2	36	1	15		
INCOME CHARACTERISTICS 12/ 13/												
LOW INCOME												
MODERATE INCOME	53	1243	21	556	4	73	24	510	3	46	1	58
MIDDLE INCOME	358	11613	155	5204	10	265	162	4604	31	1540		
UPPER INCOME	186	9172	91	5129	9	619	67	2480	16	676	3	268
INCOME & RACIAL/ETHNIC COMP 11/ 12/ 13/												
LOW INCOME												
LESS THAN 10% MINORITY												
10-19% MINORITY												
20-49% MINORITY												
50-79% MINORITY												
80-100% MINORITY												
MODERATE INCOME												
LESS THAN 10% MINORITY												
10-19% MINORITY												
20-49% MINORITY	13	280	6	149			6	105	1	26		
50-79% MINORITY	37	912	15	407	4	73	16	369	1	5	1	58
80-100% MINORITY	3	51					2	36	1	15		
MIDDLE INCOME												
LESS THAN 10% MINORITY	100	3637	56	1907	4	116	36	1382	4	232		
10-19% MINORITY	34	1159	22	706			10	375	2	78		
20-49% MINORITY	224	6817	77	2591	6	149	116	2847	25	1230		
50-79% MINORITY												
80-100% MINORITY												
UPPER INCOME												
LESS THAN 10% MINORITY	58	3347	33	2029	2	217	16	730	6	286	1	85
10-19% MINORITY	99	3977	42	2040	5	347	42	1131	8	276	2	183
20-49% MINORITY	29	1848	16	1060	2	55	9	619	2	114		
50-79% MINORITY												
80-100% MINORITY												
SMALL COUNTY	82	2511	50	1191	6	541	23	728	2	36	1	15
ALL OTHER TRACTS 21/												
TOTAL 14/	679	24539	317	12080	29	1498	276	8322	52	2298	5	341

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TYPE OF CENSUS TRACT 10/	Applications Received 20/		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
RACIAL/ETHNIC COMPOSITION 11/												
LESS THAN 10% MINORITY												
10-19% MINORITY	5	5413	5	5413								
20-49% MINORITY	28	40009	24	17009					4	23000		
50-79% MINORITY	4	1129	3	829					1	300		
80-100% MINORITY	1	93	1	93								
INCOME CHARACTERISTICS 12/ 13/												
LOW INCOME												
MODERATE INCOME	8	5300	6	3000					2	2300		
MIDDLE INCOME	26	31713	24	16313					2	15400		
UPPER INCOME	4	9631	3	4031					1	5600		
INCOME & RACIAL/ETHNIC COMP 11/ 12/ 13/												
LOW INCOME												
LESS THAN 10% MINORITY												
10-19% MINORITY												
20-49% MINORITY												
50-79% MINORITY												
80-100% MINORITY												
MODERATE INCOME												
LESS THAN 10% MINORITY												
10-19% MINORITY												
20-49% MINORITY	3	4078	2	2078					1	2000		
50-79% MINORITY	4	1129	3	829					1	300		
80-100% MINORITY	1	93	1	93								
MIDDLE INCOME												
LESS THAN 10% MINORITY												
10-19% MINORITY	3	1607	3	1607								
20-49% MINORITY	23	30106	21	14706					2	15400		
50-79% MINORITY												
80-100% MINORITY												
UPPER INCOME												
LESS THAN 10% MINORITY												
10-19% MINORITY	2	3806	2	3806								
20-49% MINORITY	2	5825	1	225					1	5600		
50-79% MINORITY												
80-100% MINORITY												
SMALL COUNTY												
ALL OTHER TRACTS 21/												
TOTAL 14/	38	46644	33	23344					5	23300		

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TYPE OF CENSUS TRACT 10/	Applications Received 20/		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
RACIAL/ETHNIC COMPOSITION 11/												
LESS THAN 10% MINORITY	135	13900	104	10423	4	434	19	2030	7	959	1	54
10-19% MINORITY	154	20638	119	12761	4	4763	21	2181	9	813	1	120
20-49% MINORITY	610	66000	440	50436	27	2476	87	7047	47	5095	9	946
50-79% MINORITY	95	7429	77	6574	3	188	10	322	4	294	1	51
80-100% MINORITY	11	455	10	440					1	15		
INCOME CHARACTERISTICS 12/ 13/												
LOW INCOME												
MODERATE INCOME	128	8872	105	7776	3	188	13	496	6	361	1	51
MIDDLE INCOME	694	73076	508	56181	29	2669	95	7786	51	5320	11	1120
UPPER INCOME	183	26474	137	16677	6	5004	29	3298	11	1495		
INCOME & RACIAL/ETHNIC COMP 11/ 12/ 13/												
LOW INCOME												
LESS THAN 10% MINORITY												
10-19% MINORITY												
20-49% MINORITY												
50-79% MINORITY												
80-100% MINORITY												
MODERATE INCOME												
LESS THAN 10% MINORITY												
10-19% MINORITY												
20-49% MINORITY	22	988	18	762			3	174	1	52		
50-79% MINORITY	95	7429	77	6574	3	188	10	322	4	294	1	51
80-100% MINORITY	11	455	10	440					1	15		
MIDDLE INCOME												
LESS THAN 10% MINORITY	82	7698	69	6556	1	65	8	678	3	345	1	54
10-19% MINORITY	53	4416	43	3587	2	149	4	303	3	257	1	120
20-49% MINORITY	559	60962	396	46038	26	2455	83	6805	45	4718	9	946
50-79% MINORITY												
80-100% MINORITY												
UPPER INCOME												
LESS THAN 10% MINORITY	53	6202	35	3867	3	369	11	1352	4	614		
10-19% MINORITY	101	16222	76	9174	2	4614	17	1878	6	556		
20-49% MINORITY	29	4050	26	3636	1	21	1	68	1	325		
50-79% MINORITY												
80-100% MINORITY												
SMALL COUNTY	154	21094	116	14732	6	1127	21	3477	9	1268	2	490
ALL OTHER TRACTS 21/												
TOTAL 14/	1159	129516	866	95366	44	8988	158	15057	77	8444	14	1661

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TYPE OF CENSUS TRACT 10/	Applications Received 20/		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
RACIAL/ETHNIC COMPOSITION 11/												
LESS THAN 10% MINORITY	88	6026	41	2630	7	410	34	2578	5	359	1	49
10-19% MINORITY	33	2530	8	486	5	371	16	1310	4	363		
20-49% MINORITY	67	3317	21	934	24	899	22	1484				
50-79% MINORITY	8	285	1	49	4	69	3	167				
80-100% MINORITY												
INCOME CHARACTERISTICS 12/ 13/												
LOW INCOME												
MODERATE INCOME	13	545	2	92	4	69	7	384				
MIDDLE INCOME	108	7046	44	2840	15	815	44	3096	4	246	1	49
UPPER INCOME	75	4567	25	1167	21	865	24	2059	5	476		
INCOME & RACIAL/ETHNIC COMP 11/ 12/ 13/												
LOW INCOME												
LESS THAN 10% MINORITY												
10-19% MINORITY												
20-49% MINORITY												
50-79% MINORITY												
80-100% MINORITY												
MODERATE INCOME												
LESS THAN 10% MINORITY												
10-19% MINORITY												
20-49% MINORITY												
50-79% MINORITY												
80-100% MINORITY												
MIDDLE INCOME												
LESS THAN 10% MINORITY												
10-19% MINORITY												
20-49% MINORITY												
50-79% MINORITY												
80-100% MINORITY												
UPPER INCOME												
LESS THAN 10% MINORITY												
10-19% MINORITY												
20-49% MINORITY												
50-79% MINORITY												
80-100% MINORITY												
SMALL COUNTY	96	6429	54	3592	6	356	28	1871	4	234	4	376
ALL OTHER TRACTS 21/												
TOTAL 14/	292	18587	125	7691	46	2105	103	7410	13	956	5	425

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APPLICANT CHARACTERISTICS	Debt-to- Income Ratio		Employment History		Credit History		Collateral		Insufficient Cash		Unverifiable Information		Credit App. Incomplete		Mortgage Insurance Denied		Other		Total /22		
	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	
	RACE 5/																				
AMERICAN INDIAN/ALASKA NATIVE																					
ASIAN																					
BLACK OR AFRICAN AMERICAN	7	24	1	3	12	41	3	10	1	3	1	3					4	14	29	100	
NATIVE HAWAIIAN/OTHER PACIFIC ISLND	2	50			1	25					1	25							4	100	
WHITE	49	21	15	6	74	31	29	12	9	4	19	8	7	3			35	15	237	100	
2 OR MORE MINORITY RACES					1	50	1	50											2	100	
JOINT (WHITE/MINORITY RACE)					1	33	1	33									1	33	3	100	
RACE NOT AVAILABLE 6/	11	26	3	7	8	19	5	12	5	12	5	12					6	14	43	100	
ETHNICITY 7/																					
HISPANIC OR LATINO	1	9			7	64	2	18	1	9									11	100	
NOT HISPANIC OR LATINO	58	22	16	6	80	30	33	13	9	3	21	8	7	3			39	15	263	100	
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)					1	100													1	100	
ETHNICITY NOT AVAILABLE 6/	10	23	3	7	9	21	4	9	5	12	5	12					7	16	43	100	
MINORITY STATUS 8/																					
WHITE NON-HISPANIC	48	21	15	7	66	29	28	12	8	4	19	8	7	3			34	15	225	100	
OTHERS, INCL. HISPANIC	10	20	1	2	22	45	7	14	2	4	2	4					5	10	49	100	
GENDER 19/																					
MALE	35	23	8	5	46	31	19	13	6	4	9	6	3	2			24	16	150	100	
FEMALE	11	16	6	9	26	38	5	7	1	1	8	12	3	4			8	12	68	100	
JOINT (MALE/FEMALE)	19	22	3	3	24	28	14	16	7	8	7	8	1	1			11	13	86	100	
GENDER NOT AVAILABLE 6/	4	29	2	14	1	7	1	7	1	7	2	14					3	21	14	100	
INCOME 9/																					
LESS THAN 50% OF MSA/MD MEDIAN	16	33	6	12	13	27	2	4	1	2	5	10					6	12	49	100	
50-79% OF MSA/MD MEDIAN	21	23	7	8	31	33	9	10	5	5	7	8					13	14	93	100	
80-99% OF MSA/MD MEDIAN	11	20			18	33	10	18			4	7	3	5			9	16	55	100	
100-119% OF MSA/MD MEDIAN	8	16	3	6	14	28	7	14	4	8	4	8	2	4			8	16	50	100	
120% OR MORE OF MSA/MD MEDIAN	12	20	2	3	13	22	10	17	5	8	6	10	2	3			9	15	59	100	
INCOME NOT AVAILABLE 6/	1	8	1	8	8	67	1	8									1	8	12	100	

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APPLICANT CHARACTERISTICS	Debt-to- Income Ratio		Employment History		Credit History		Collateral		Insufficient Cash		Unverifiable Information		Credit App. Incomplete		Mortgage Insurance Denied		Other		Total /22	
	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%
RACE 5/																				
AMERICAN INDIAN/ALASKA NATIVE																				
ASIAN	2	50	1	25											1	25			4	100
BLACK OR AFRICAN AMERICAN	1	7	1	7	6	40	4	27	1	7							2	13	15	100
NATIVE HAWAIIAN/OTHER PACIFIC ISLND																				
WHITE	29	21	4	3	49	35	22	16	11	8	3	2	4	3	3	2	16	11	141	100
2 OR MORE MINORITY RACES																				
JOINT (WHITE/MINORITY RACE)					2	50	1	25			1	25							4	100
RACE NOT AVAILABLE 6/	2	20	1	10	5	50			1	10							1	10	10	100
ETHNICITY 7/																				
HISPANIC OR LATINO	1	20	1	20	2	40	1	20											5	100
NOT HISPANIC OR LATINO	29	19	5	3	54	35	24	16	12	8	4	3	3	2	4	3	18	12	153	100
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)							2	100											2	100
ETHNICITY NOT AVAILABLE 6/	4	29	1	7	6	43			1	7			1	7			1	7	14	100
MINORITY STATUS 8/																				
WHITE NON-HISPANIC	26	19	3	2	47	35	22	16	11	8	3	2	3	2	3	2	16	12	134	100
OTHERS, INCL. HISPANIC	4	15	3	12	9	35	5	19	1	4	1	4			1	4	2	8	26	100
GENDER 19/																				
MALE	10	16	2	3	26	43	10	16	3	5	1	2			1	2	8	13	61	100
FEMALE	12	27	3	7	14	32	4	9	4	9	1	2	2	5	2	5	2	5	44	100
JOINT (MALE/FEMALE)	10	16	1	2	20	32	13	21	5	8	2	3	2	3	1	2	8	13	62	100
GENDER NOT AVAILABLE 6/	2	29	1	14	2	29			1	14							1	14	7	100
INCOME 9/																				
LESS THAN 50% OF MSA/MD MEDIAN	12	34	1	3	14	40	2	6	5	14	1	3							35	100
50-79% OF MSA/MD MEDIAN	7	16	3	7	20	44	5	11	3	7	2	4			1	2	4	9	45	100
80-99% OF MSA/MD MEDIAN	4	20			10	50	1	5	2	10			1	5			2	10	20	100
100-119% OF MSA/MD MEDIAN	3	18	1	6	6	35	3	18									4	24	17	100
120% OR MORE OF MSA/MD MEDIAN	7	13	2	4	12	21	16	29	3	5	1	2	3	5	3	5	9	16	56	100
INCOME NOT AVAILABLE 6/	1	100																	1	100

MSA/MD: 17300 - CLARKSVILLE, TN-KY

APPLICANT CHARACTERISTICS	Debt-to- Income Ratio		Employment History		Credit History		Collateral		Insufficient Cash		Unverifiable Information		Credit App. Incomplete		Mortgage Insurance Denied		Other		Total /22		
	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	
	RACE 5/																				
AMERICAN INDIAN/ALASKA NATIVE					4	31	5	38	1	8			1	8			2	15	13	100	
ASIAN	4	24			4	24	2	12			2	12	1	6	1	6	3	18	17	100	
BLACK OR AFRICAN AMERICAN	41	20	2	1	74	36	30	15	5	2	8	4	11	5	2	1	30	15	203	100	
NATIVE HAWAIIAN/OTHER PACIFIC ISLND	2	40			1	20	1	20									1	20	5	100	
WHITE	176	21	17	2	227	26	190	22	20	2	34	4	76	9	4	0	114	13	858	100	
2 OR MORE MINORITY RACES					1	33	1	33	1	33									3	100	
JOINT (WHITE/MINORITY RACE)	4	22			5	28	4	22	1	6							4	22	18	100	
RACE NOT AVAILABLE 6/	24	12	1	0	57	28	58	29	4	2	7	3	29	14			21	10	201	100	
ETHNICITY 7/																					
HISPANIC OR LATINO	11	23			16	33	10	21	2	4			5	10			4	8	48	100	
NOT HISPANIC OR LATINO	209	20	18	2	300	29	219	21	26	2	41	4	80	8	7	1	150	14	1050	100	
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	8	42	1	5	4	21	3	16			1	5					2	11	19	100	
ETHNICITY NOT AVAILABLE 6/	23	11	1	0	53	26	59	29	4	2	9	4	33	16			19	9	201	100	
MINORITY STATUS 8/																					
WHITE NON-HISPANIC	157	20	16	2	207	26	178	23	18	2	31	4	68	9	4	1	109	14	788	100	
OTHERS, INCL. HISPANIC	68	22	3	1	107	34	53	17	10	3	11	3	16	5	3	1	45	14	316	100	
GENDER 19/																					
MALE	75	19	4	1	112	29	75	19	12	3	13	3	45	11	1	0	55	14	392	100	
FEMALE	66	25	9	3	75	29	48	18	5	2	11	4	14	5	3	1	32	12	263	100	
JOINT (MALE/FEMALE)	96	18	7	1	150	29	120	23	14	3	23	4	36	7	3	1	74	14	523	100	
GENDER NOT AVAILABLE 6/	14	10			36	26	48	34	1	1	4	3	23	16			14	10	140	100	
INCOME 9/																					
LESS THAN 50% OF MSA/MD MEDIAN	45	35	4	3	33	26	18	14	4	3	2	2	6	5			16	13	128	100	
50-79% OF MSA/MD MEDIAN	72	32	4	2	67	30	42	19	5	2	6	3	7	3	2	1	17	8	222	100	
80-99% OF MSA/MD MEDIAN	22	15	3	2	51	34	31	21	5	3	6	4	14	9	1	1	18	12	151	100	
100-119% OF MSA/MD MEDIAN	26	18	1	1	38	26	31	21	7	5	3	2	13	9	2	1	25	17	146	100	
120% OR MORE OF MSA/MD MEDIAN	82	15	8	1	136	25	142	27	11	2	28	5	48	9	2	0	77	14	534	100	
INCOME NOT AVAILABLE 6/	4	3			48	35	27	20			6	4	30	22			22	16	137	100	

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APPLICANT CHARACTERISTICS	Debt-to- Income Ratio		Employment History		Credit History		Collateral		Insufficient Cash		Unverifiable Information		Credit App. Incomplete		Mortgage Insurance Denied		Other		Total /22		
	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	
RACE 5/																					
AMERICAN INDIAN/ALASKA NATIVE														1	100					1	100
ASIAN																					
BLACK OR AFRICAN AMERICAN	3	11			15	54	6	21									4	14	28	100	
NATIVE HAWAIIAN/OTHER PACIFIC ISLND																					
WHITE	16	9	1	1	96	55	20	11	1	1	1	1	5	3			35	20	175	100	
2 OR MORE MINORITY RACES																					
JOINT (WHITE/MINORITY RACE)					1	33	1	33									1	33	3	100	
RACE NOT AVAILABLE 6/	4	10			24	60	7	18									5	13	40	100	
ETHNICITY 7/																					
HISPANIC OR LATINO	1	20			2	40	1	20					1	20					5	100	
NOT HISPANIC OR LATINO	19	10	1	1	105	53	27	14	1	1	1	1	5	3			39	20	198	100	
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)					2	67											1	33	3	100	
ETHNICITY NOT AVAILABLE 6/	3	7			27	66	6	15									5	12	41	100	
MINORITY STATUS 8/																					
WHITE NON-HISPANIC	16	9	1	1	92	54	20	12	1	1	1	1	4	2			34	20	169	100	
OTHERS, INCL. HISPANIC	4	10			19	49	8	21					2	5			6	15	39	100	
GENDER 19/																					
MALE	10	12	1	1	39	48	12	15	1	1	1	1	2	2			16	20	82	100	
FEMALE	6	13			27	60	3	7					1	2			8	18	45	100	
JOINT (MALE/FEMALE)	5	6			49	56	14	16					3	3			16	18	87	100	
GENDER NOT AVAILABLE 6/	2	6			21	64	5	15									5	15	33	100	
INCOME 9/																					
LESS THAN 50% OF MSA/MD MEDIAN	8	26			17	55	3	10									3	10	31	100	
50-79% OF MSA/MD MEDIAN	3	7	1	2	31	67	2	4									9	20	46	100	
80-99% OF MSA/MD MEDIAN	3	8			23	62	3	8	1	3			1	3			6	16	37	100	
100-119% OF MSA/MD MEDIAN	3	9			16	50	5	16			1	3	1	3			6	19	32	100	
120% OR MORE OF MSA/MD MEDIAN	6	6			46	47	21	21					4	4			21	21	98	100	
INCOME NOT AVAILABLE 6/					3	100													3	100	

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APPLICANT CHARACTERISTICS	Debt-to- Income Ratio		Employment History		Credit History		Collateral		Insufficient Cash		Unverifiable Information		Credit App. Incomplete		Mortgage Insurance Denied		Other		Total /22		
	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	
	RACE 5/																				
AMERICAN INDIAN/ALASKA NATIVE																					
ASIAN					1	100														1	100
BLACK OR AFRICAN AMERICAN	7	20	1	3	12	34	6	17	2	6			2	6			5	14	35	100	
NATIVE HAWAIIAN/OTHER PACIFIC ISLND							1	100												1	100
WHITE	23	22	3	3	13	13	23	22	3	3	8	8	11	11			20	19	104	100	
2 OR MORE MINORITY RACES					1	100														1	100
JOINT (WHITE/MINORITY RACE)	1	25			1	25	1	25									1	25	4	100	
RACE NOT AVAILABLE 6/	5	17	1	3	9	30	8	27	1	3	3	10					3	10	30	100	
ETHNICITY 7/																					
HISPANIC OR LATINO	3	43	1	14	1	14	1	14									1	14	7	100	
NOT HISPANIC OR LATINO	29	21	3	2	27	19	30	22	5	4	8	6	12	9			25	18	139	100	
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)					1	100														1	100
ETHNICITY NOT AVAILABLE 6/	4	14	1	3	8	28	8	28	1	3	3	10	1	3			3	10	29	100	
MINORITY STATUS 8/																					
WHITE NON-HISPANIC	21	22	2	2	12	12	22	23	3	3	8	8	10	10			19	20	97	100	
OTHERS, INCL. HISPANIC	11	22	2	4	17	34	9	18	2	4			2	4			7	14	50	100	
GENDER 19/																					
MALE	19	25			19	25	14	18	3	4	3	4	7	9			11	14	76	100	
FEMALE	5	22	3	13	4	17	4	17			2	9	2	9			3	13	23	100	
JOINT (MALE/FEMALE)	10	18	2	4	8	14	14	25	3	5	4	7	4	7			12	21	57	100	
GENDER NOT AVAILABLE 6/	2	10			6	30	7	35			2	10					3	15	20	100	
INCOME 9/																					
LESS THAN 50% OF MSA/MD MEDIAN	3	100																		3	100
50-79% OF MSA/MD MEDIAN	5	36	1	7	3	21	2	14	1	7	1	7					1	7	14	100	
80-99% OF MSA/MD MEDIAN	3	20			4	27	4	27	1	7	1	7					2	13	15	100	
100-119% OF MSA/MD MEDIAN	7	29	1	4	6	25	2	8	1	4	1	4					6	25	24	100	
120% OR MORE OF MSA/MD MEDIAN	18	18	3	3	19	19	26	26	3	3	5	5	11	11			16	16	101	100	
INCOME NOT AVAILABLE 6/					5	26	5	26			3	16	2	11			4	21	19	100	

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APPLICANT CHARACTERISTICS	Debt-to- Income Ratio		Employment History		Credit History		Collateral		Insufficient Cash		Unverifiable Information		Credit App. Incomplete		Mortgage Insurance Denied		Other		Total /22	
	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%
	RACE 5/																			
AMERICAN INDIAN/ALASKA NATIVE																				
ASIAN																				
BLACK OR AFRICAN AMERICAN	1	33					1	33	1	33									3	100
NATIVE HAWAIIAN/OTHER PACIFIC ISLND																				
WHITE	10	18	1	2	24	43	7	13	2	4	1	2	3	5			8	14	56	100
2 OR MORE MINORITY RACES																				
JOINT (WHITE/MINORITY RACE)					1	50	1	50											2	100
RACE NOT AVAILABLE 6/	1	17			2	33	1	17									2	33	6	100
ETHNICITY 7/																				
HISPANIC OR LATINO																				
NOT HISPANIC OR LATINO	11	19	1	2	24	41	9	15	3	5	1	2	2	3			8	14	59	100
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)																				
ETHNICITY NOT AVAILABLE 6/	1	13			3	38	1	13					1	13			2	25	8	100
MINORITY STATUS 8/																				
WHITE NON-HISPANIC	10	19	1	2	23	43	7	13	2	4	1	2	2	4			8	15	54	100
OTHERS, INCL. HISPANIC	1	20			1	20	2	40	1	20									5	100
GENDER 19/																				
MALE	5	19			9	33	5	19	3	11	1	4	1	4			3	11	27	100
FEMALE	3	33			5	56	1	11											9	100
JOINT (MALE/FEMALE)	4	15	1	4	11	41	4	15					2	7			5	19	27	100
GENDER NOT AVAILABLE 6/					2	50											2	50	4	100
INCOME 9/																				
LESS THAN 50% OF MSA/MD MEDIAN	6	33			8	44	2	11	2	11									18	100
50-79% OF MSA/MD MEDIAN	2	13			8	50	2	13	1	6							3	19	16	100
80-99% OF MSA/MD MEDIAN	2	18	1	9	6	55					1	9	1	9					11	100
100-119% OF MSA/MD MEDIAN					1	17	3	50									2	33	6	100
120% OR MORE OF MSA/MD MEDIAN	2	15			3	23	3	23					1	8			4	31	13	100
INCOME NOT AVAILABLE 6/					1	33							1	33			1	33	3	100

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CENSUS TRACTS BY MEDIAN AGE OF HOMES 23/	Loans on 1- to 4-Family and Manufactured Home Dwellings										Loans On Manufactured Home Dwellings From Columns A,B,C & D			
	Home Purchase Loans				Refinancings		Home Improvement Loans		Loans on Dwellings For 5 or More Families				Nonoccupant Loans From Columns A, B, C & D	
	FHA, FSA/RHS & VA		Conventional		C		D		E		F		G	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
<b>1990-MARCH 2000</b>														
LOANS ORIGINATED	974	158239	210	35943	1133	173019	54	2981	8	4096	253	34991	4	463
APPLICAT'N APPROVED, NOT ACCEPTED	24	3477	10	5172	122	17957	3	167			17	6044	4	205
APPLICATIONS DENIED	112	16185	29	3081	451	60993	61	1750			56	5191	3	131
APPLICATIONS WITHDRAWN	94	13523	28	4656	339	48872	12	620	1	1250	22	2479	1	130
FILES CLOSED FOR INCOMPLETENESS	9	984	1	150	116	17874					7	714		
<b>1980-1989</b>														
LOANS ORIGINATED	948	150647	329	42675	1287	181300	121	5123	12	10907	250	25552	75	4966
APPLICAT'N APPROVED, NOT ACCEPTED	30	4749	38	2381	113	15363	13	860			13	1243	31	1420
APPLICATIONS DENIED	118	15072	80	6734	659	87705	130	4353			54	4913	64	4879
APPLICATIONS WITHDRAWN	99	15048	32	4675	415	56267	26	1253	2	19750	28	3226	10	740
FILES CLOSED FOR INCOMPLETENESS	8	1332	5	327	98	13559	2	215			2	138	4	370
<b>1970-1979</b>														
LOANS ORIGINATED	476	66199	243	25877	862	104594	102	2369	9	5910	236	22708	44	2129
APPLICAT'N APPROVED, NOT ACCEPTED	10	1188	15	1320	69	8449	7	306			11	1460	7	411
APPLICATIONS DENIED	82	10288	65	5922	408	48479	56	1534			31	4015	30	2080
APPLICATIONS WITHDRAWN	41	5743	34	3952	208	25778	9	312			21	2249	2	86
FILES CLOSED FOR INCOMPLETENESS	5	669	6	678	57	7430	3	126			3	704	1	55
<b>1960-1969</b>														
LOANS ORIGINATED	62	8487	56	7407	180	18986	29	1308	1	93	86	8601	1	84
APPLICAT'N APPROVED, NOT ACCEPTED	1	71			9	1235	4	114			1	65		
APPLICATIONS DENIED	12	1178	8	630	84	8578	16	322			9	453	2	56
APPLICATIONS WITHDRAWN	3	418	5	365	26	2709	3	30			4	308		
FILES CLOSED FOR INCOMPLETENESS	2	128	3	208	14	2112					2	105		
<b>1959 OR EARLIER</b>														
LOANS ORIGINATED	42	6542	39	3713	58	6115	11	299	3	2338	41	3514	1	49
APPLICAT'N APPROVED, NOT ACCEPTED	1	120	5	179	4	498	2	51			2	176	4	69
APPLICATIONS DENIED	6	742	17	1507	36	3033	13	363			8	485	4	264
APPLICATIONS WITHDRAWN	8	909	4	373	18	2549	2	83	2	2300	2	182		
FILES CLOSED FOR INCOMPLETENESS	1	85			1	75								
<b>AGE UNKNOWN</b>														
LOANS ORIGINATED														
APPLICAT'N APPROVED, NOT ACCEPTED														
APPLICATIONS DENIED														
APPLICATIONS WITHDRAWN														
FILES CLOSED FOR INCOMPLETENESS														

MSA/MD: 17300 - CLARKSVILLE, TN-KY

LOCATION CATEGORY	Loans on 1- to 4-Family and Manufactured Home Dwellings								Loans on Dwellings For 5 or More Families E	Nonoccupant Loans From Columns A, B, C & D F	Loans On Manufactured Home Dwellings From Columns A,B,C & D G			
	Home Purchase Loans				Refinancings		Home Improvement Loans				Number	\$000's	Number	\$000's
	FHA, FSA/RHS & VA A		Conventional B		C		D							
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's						
PRINCIPAL CITY 24/														
LOANS ORIGINATED	1998	320377	483	74194	2163	315992	145	7016	29	21644	487	60323	24	1315
APPLICAT'N APPROVED, NOT ACCEPTED	55	8369	41	6880	215	29986	13	455			32	7373	27	908
APPLICATIONS DENIED	204	29322	73	7425	995	130859	163	4552			89	8439	26	2072
APPLICATIONS WITHDRAWN	167	25107	65	10707	702	97509	37	1481	4	22050	55	6130	2	243
FILES CLOSED FOR INCOMPLETENESS	16	2047	5	572	183	27279	2	111			7	817		
MSA/MD LESS PRINCIPAL CITY 25/														
LOANS ORIGINATED	504	69737	394	41421	1357	168022	172	5064	4	1700	379	35043	101	6376
APPLICAT'N APPROVED, NOT ACCEPTED	11	1236	27	2172	102	13516	16	1043			12	1615	19	1197
APPLICATIONS DENIED	126	14143	126	10449	643	77929	113	3770			69	6618	77	5338
APPLICATIONS WITHDRAWN	78	10534	38	3314	304	38666	15	817	1	1250	22	2314	11	713
FILES CLOSED FOR INCOMPLETENESS	9	1151	10	791	103	13771	3	230			7	844	5	425

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BORROWER OR CENSUS TRACT CHARACTERISTICS	15/ NO REPORTED PRICING DATA #	REPORTED PRICING DATA #	PERCENTAGE POINTS ABOVE AVERAGE PRIME OFFER RATE: ONLY INCLUDES LOANS WITH APR ABOVE THE THRESHOLD 16/							MEAN	MEDIAN
			1.50 - 1.99 #	2.00 - 2.49 #	2.50 - 2.99 #	3.00 - 3.99 #	4.00 - 4.99 #	5 OR MORE #			
<b>BORROWER CHARACTERISTICS</b>											
<b>RACE 5/</b>											
AMERICAN INDIAN/ALASKA NATIVE	2										
ASIAN	5										
BLACK OR AFRICAN AMERICAN	74										
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND	1										
WHITE	488	7	6			1			1.98	1.67	
2 OR MORE MINORITY RACES											
JOINT (WHITE/MINORITY RACE)	6										
RACE NOT AVAILABLE 6/	26										
<b>ETHNICITY 7/</b>											
HISPANIC OR LATINO	18	1	1						1.61	1.61	
NOT HISPANIC OR LATINO	551	6	5			1			2.05	1.80	
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	6										
ETHNICITY NOT AVAILABLE 6/	27										
<b>MINORITY STATUS 8/</b>											
WHITE NON-HISPANIC	465	6	5			1			2.05	1.80	
OTHERS, INCLUDING HISPANIC	107	1	1						1.61	1.61	
<b>INCOME 9/</b>											
LESS THAN 50% OF MSA/MD MEDIAN	79	2	2						1.58	1.58	
50-79% OF MSA/MD MEDIAN	245	3	2			1			2.28	1.67	
80-99% OF MSA/MD MEDIAN	90	1	1						1.95	1.95	
100-119% OF MSA/MD MEDIAN	66										
120% OR MORE OF MSA/MD MEDIAN	122	1	1						1.93	1.93	
INCOME NOT AVAILABLE 6/											
<b>GENDER 19/</b>											
MALE	229	4	3			1			2.20	1.81	
FEMALE	205	3	3						1.70	1.61	
JOINT (MALE/FEMALE)	159										
GENDER NOT AVAILABLE 6/	9										
<b>CENSUS TRACT CHARACTERISTICS 10/</b>											
<b>RACIAL/ETHNIC COMPOSITION 11/</b>											
LESS THAN 10% MINORITY	93	1	1						1.67	1.67	
10-19% MINORITY	145	1	1						1.95	1.95	
20-49% MINORITY	343	5	4			1			2.05	1.61	
50-79% MINORITY	20										
80-100% MINORITY	1										
<b>INCOME CHARACTERISTICS 12/ 13/</b>											
LOW INCOME											
MODERATE INCOME	38										
MIDDLE INCOME	388	6	5			1			1.99	1.64	
UPPER INCOME	176	1	1						1.95	1.95	

MSA/MD: 17300 - CLARKSVILLE, TN-KY

BORROWER OR CENSUS TRACT CHARACTERISTICS	15/ NO REPORTED PRICING DATA \$000's	REPORTED PRICING DATA \$000's	PERCENTAGE POINTS ABOVE AVERAGE PRIME OFFER RATE: ONLY INCLUDES LOANS WITH APR ABOVE THE THRESHOLD 16/							
			1.50 - 1.99 \$000's	2.00 - 2.49 \$000's	2.50 - 2.99 \$000's	3.00 - 3.99 \$000's	4.00 - 4.99 \$000's	5 OR MORE \$000's	MEAN 30/	MEDIAN 31/
<b>BORROWER CHARACTERISTICS</b>										
<b>RACE 5/</b>										
AMERICAN INDIAN/ALASKA NATIVE	249									
ASIAN	570									
BLACK OR AFRICAN AMERICAN	9302									
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND	150									
WHITE	61702	734	609			125			2.08	1.93
2 OR MORE MINORITY RACES										
JOINT (WHITE/MINORITY RACE)	1038									
RACE NOT AVAILABLE 6/	3175									
<b>ETHNICITY 7/</b>										
HISPANIC OR LATINO	2000	64	64						1.61	1.61
NOT HISPANIC OR LATINO	70463	670	545			125			2.12	1.93
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	583									
ETHNICITY NOT AVAILABLE 6/	3140									
<b>MINORITY STATUS 8/</b>										
WHITE NON-HISPANIC	59208	670	545			125			2.12	1.93
OTHERS, INCLUDING HISPANIC	13350	64	64						1.61	1.61
<b>INCOME 9/</b>										
LESS THAN 50% OF MSA/MD MEDIAN	6624	153	153						1.58	1.55
50-79% OF MSA/MD MEDIAN	27246	287	162			125			2.49	1.67
80-99% OF MSA/MD MEDIAN	12159	130	130						1.95	1.95
100-119% OF MSA/MD MEDIAN	8735									
120% OR MORE OF MSA/MD MEDIAN	21422	164	164						1.93	1.93
INCOME NOT AVAILABLE 6/										
<b>GENDER 19/</b>										
MALE	27867	440	315			125			2.28	1.95
FEMALE	25111	294	294						1.78	1.93
JOINT (MALE/FEMALE)	22341									
GENDER NOT AVAILABLE 6/	867									
<b>CENSUS TRACT CHARACTERISTICS 10/</b>										
<b>RACIAL/ETHNIC COMPOSITION 11/</b>										
LESS THAN 10% MINORITY	12712	96	96						1.67	1.67
10-19% MINORITY	19640	130	130						1.95	1.95
20-49% MINORITY	41586	508	383			125			2.19	1.93
50-79% MINORITY	2209									
80-100% MINORITY	39									
<b>INCOME CHARACTERISTICS 12/ 13/</b>										
LOW INCOME										
MODERATE INCOME	4449									
MIDDLE INCOME	44634	604	479			125			2.11	1.67
UPPER INCOME	27103	130	130						1.95	1.95

MSA/MD: 17300 - CLARKSVILLE, TN-KY

BORROWER OR CENSUS TRACT CHARACTERISTICS	15/ NO REPORTED PRICING DATA #	REPORTED PRICING DATA #	PERCENTAGE POINTS ABOVE AVERAGE PRIME OFFER RATE: ONLY INCLUDES LOANS WITH APR ABOVE THE THRESHOLD 16/							MEAN	MEDIAN
			1.50 - 1.99 #	2.00 - 2.49 #	2.50 - 2.99 #	3.00 - 3.99 #	4.00 - 4.99 #	5 OR MORE #			
<b>BORROWER CHARACTERISTICS</b>											
RACE 5/											
AMERICAN INDIAN/ALASKA NATIVE	14										
ASIAN	18										
BLACK OR AFRICAN AMERICAN	234	1	1						1.74	1.74	
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND	14										
WHITE	1387	1	1						1.50	1.50	
2 OR MORE MINORITY RACES	3										
JOINT (WHITE/MINORITY RACE)	35										
RACE NOT AVAILABLE 6/	125										
ETHNICITY 7/											
HISPANIC OR LATINO	109										
NOT HISPANIC OR LATINO	1561	1	1						1.74	1.74	
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	32										
ETHNICITY NOT AVAILABLE 6/	128	1	1						1.50	1.50	
MINORITY STATUS 8/											
WHITE NON-HISPANIC	1257										
OTHERS, INCLUDING HISPANIC	443	1	1						1.74	1.74	
INCOME 9/											
LESS THAN 50% OF MSA/MD MEDIAN	11										
50-79% OF MSA/MD MEDIAN	334	1	1						1.50	1.50	
80-99% OF MSA/MD MEDIAN	465										
100-119% OF MSA/MD MEDIAN	310										
120% OR MORE OF MSA/MD MEDIAN	708	1	1						1.74	1.74	
INCOME NOT AVAILABLE 6/	2										
GENDER 19/											
MALE	1077	2	2						1.62	1.62	
FEMALE	139										
JOINT (MALE/FEMALE)	559										
GENDER NOT AVAILABLE 6/	55										
<b>CENSUS TRACT CHARACTERISTICS 10/</b>											
RACIAL/ETHNIC COMPOSITION 11/											
LESS THAN 10% MINORITY	148										
10-19% MINORITY	318										
20-49% MINORITY	1349	2	2						1.62	1.62	
50-79% MINORITY	15										
80-100% MINORITY											
INCOME CHARACTERISTICS 12/ 13/											
LOW INCOME											
MODERATE INCOME	44										
MIDDLE INCOME	1406	2	2						1.62	1.62	
UPPER INCOME	380										

MSA/MD: 17300 - CLARKSVILLE, TN-KY

BORROWER OR CENSUS TRACT CHARACTERISTICS	15/ NO REPORTED PRICING DATA \$000's	REPORTED PRICING DATA \$000's	PERCENTAGE POINTS ABOVE AVERAGE PRIME OFFER RATE: ONLY INCLUDES LOANS WITH APR ABOVE THE THRESHOLD 16/							
			1.50 - 1.99 \$000's	2.00 - 2.49 \$000's	2.50 - 2.99 \$000's	3.00 - 3.99 \$000's	4.00 - 4.99 \$000's	5 OR MORE \$000's	MEAN 30/	MEDIAN 31/
<b>BORROWER CHARACTERISTICS</b>										
<b>RACE 5/</b>										
AMERICAN INDIAN/ALASKA NATIVE	2043									
ASIAN	3168									
BLACK OR AFRICAN AMERICAN	43491	209	209						1.74	1.74
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND	2593									
WHITE	226983	146	146						1.50	1.50
2 OR MORE MINORITY RACES	454									
JOINT (WHITE/MINORITY RACE)	6613									
RACE NOT AVAILABLE 6/	20512									
<b>ETHNICITY 7/</b>										
HISPANIC OR LATINO	16250									
NOT HISPANIC OR LATINO	262082	209	209						1.74	1.74
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	6354									
ETHNICITY NOT AVAILABLE 6/	21171	146	146						1.50	1.50
<b>MINORITY STATUS 8/</b>										
WHITE NON-HISPANIC	206108									
OTHERS, INCLUDING HISPANIC	78217	209	209						1.74	1.74
<b>INCOME 9/</b>										
LESS THAN 50% OF MSA/MD MEDIAN	999									
50-79% OF MSA/MD MEDIAN	40331	146	146						1.50	1.50
80-99% OF MSA/MD MEDIAN	64649									
100-119% OF MSA/MD MEDIAN	50183									
120% OR MORE OF MSA/MD MEDIAN	149473	209	209						1.74	1.74
INCOME NOT AVAILABLE 6/	222									
<b>GENDER 19/</b>										
MALE	168170	355	355						1.64	1.74
FEMALE	21059									
JOINT (MALE/FEMALE)	107172									
GENDER NOT AVAILABLE 6/	9456									
<b>CENSUS TRACT CHARACTERISTICS 10/</b>										
<b>RACIAL/ETHNIC COMPOSITION 11/</b>										
LESS THAN 10% MINORITY	28159									
10-19% MINORITY	61493									
20-49% MINORITY	214294	355	355						1.64	1.74
50-79% MINORITY	1911									
80-100% MINORITY										
<b>INCOME CHARACTERISTICS 12/ 13/</b>										
LOW INCOME										
MODERATE INCOME	6053									
MIDDLE INCOME	217657	355	355						1.64	1.74
UPPER INCOME	82147									

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BORROWER OR CENSUS TRACT CHARACTERISTICS	15/ NO REPORTED PRICING DATA #	REPORTED PRICING DATA #	PERCENTAGE POINTS ABOVE AVERAGE PRIME OFFER RATE: ONLY INCLUDES LOANS WITH APR ABOVE THE THRESHOLD 16/							MEAN	MEDIAN
			1.50 - 1.99 #	2.00 - 2.49 #	2.50 - 2.99 #	3.00 - 3.99 #	4.00 - 4.99 #	5 OR MORE #			
<b>BORROWER CHARACTERISTICS</b>											
<b>RACE 5/</b>											
AMERICAN INDIAN/ALASKA NATIVE	5										
ASIAN	9	1		1					2.29	2.29	
BLACK OR AFRICAN AMERICAN	17	4	2		1	1			2.32	2.30	
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND	1										
WHITE	403	42	11	10	9	8		2	2	2.70	2.55
2 OR MORE MINORITY RACES											
JOINT (WHITE/MINORITY RACE)	7	1				1			3.02	3.02	
RACE NOT AVAILABLE 6/	25	1			1				2.80	2.80	
<b>ETHNICITY 7/</b>											
HISPANIC OR LATINO	7										
NOT HISPANIC OR LATINO	424	48	13	11	10	10		2	2	2.67	2.55
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	6										
ETHNICITY NOT AVAILABLE 6/	30	1			1				2.80	2.80	
<b>MINORITY STATUS 8/</b>											
WHITE NON-HISPANIC	387	42	11	10	9	8		2	2	2.70	2.55
OTHERS, INCLUDING HISPANIC	50	6	2	1	1	2				2.43	2.56
<b>INCOME 9/</b>											
LESS THAN 50% OF MSA/MD MEDIAN	21	4	2	1	1					2.18	2.14
50-79% OF MSA/MD MEDIAN	63	12	1	3	4	1		2	1	3.14	2.82
80-99% OF MSA/MD MEDIAN	61	2	1			1				2.47	2.47
100-119% OF MSA/MD MEDIAN	46	5	1	1	2	1				2.63	2.83
120% OR MORE OF MSA/MD MEDIAN	269	24	6	6	4	7			1	2.61	2.53
INCOME NOT AVAILABLE 6/	7	2	2							1.75	1.75
<b>GENDER 19/</b>											
MALE	139	21	7	5	5	1		1	2	2.68	2.38
FEMALE	80	8	2	1	2	3				2.81	2.89
JOINT (MALE/FEMALE)	225	19	4	5	3	6		1		2.59	2.82
GENDER NOT AVAILABLE 6/	23	1			1					2.80	2.80
<b>CENSUS TRACT CHARACTERISTICS 10/</b>											
<b>RACIAL/ETHNIC COMPOSITION 11/</b>											
LESS THAN 10% MINORITY	115	24	4	5	7	6		1	1	2.81	2.82
10-19% MINORITY	171	14	5	3	2	3			1	2.60	2.36
20-49% MINORITY	171	9	3	2	2	1		1		2.53	2.33
50-79% MINORITY	9	2	1	1						2.10	2.10
80-100% MINORITY	1										
<b>INCOME CHARACTERISTICS 12/ 13/</b>											
LOW INCOME											
MODERATE INCOME	18	4	2	2						2.05	2.05
MIDDLE INCOME	236	31	7	4	10	7		2	1	2.81	2.82
UPPER INCOME	213	14	4	5	1	3			1	2.54	2.21

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BORROWER OR CENSUS TRACT CHARACTERISTICS	15/ NO REPORTED PRICING DATA \$000's	REPORTED PRICING DATA \$000's	PERCENTAGE POINTS ABOVE AVERAGE PRIME OFFER RATE: ONLY INCLUDES LOANS WITH APR ABOVE THE THRESHOLD 16/							MEAN 30/	MEDIAN 31/
			1.50 - 1.99 \$000's	2.00 - 2.49 \$000's	2.50 - 2.99 \$000's	3.00 - 3.99 \$000's	4.00 - 4.99 \$000's	5 OR MORE \$000's			
<b>BORROWER CHARACTERISTICS</b>											
<b>RACE 5/</b>											
AMERICAN INDIAN/ALASKA NATIVE	507										
ASIAN	1564	150		150					2.29	2.29	
BLACK OR AFRICAN AMERICAN	1945	535	252		99	184			2.37	2.83	
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND	96										
WHITE	61572	4953	1195	1458	1221	719		153	207	2.62	
2 OR MORE MINORITY RACES											
JOINT (WHITE/MINORITY RACE)	1038	70				70				3.02	
RACE NOT AVAILABLE 6/	3658	65			65					2.80	
<b>ETHNICITY 7/</b>											
HISPANIC OR LATINO	682										
NOT HISPANIC OR LATINO	65119	5708	1447	1608	1320	973		153	207	2.59	
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	901										
ETHNICITY NOT AVAILABLE 6/	3678	65			65					2.80	
<b>MINORITY STATUS 8/</b>											
WHITE NON-HISPANIC	59730	4953	1195	1458	1221	719		153	207	2.62	
OTHERS, INCLUDING HISPANIC	6568	755	252	150	99	254				2.41	
<b>INCOME 9/</b>											
LESS THAN 50% OF MSA/MD MEDIAN	1554	261	181	30	50					1.95	
50-79% OF MSA/MD MEDIAN	5733	904	31	202	351	86		153	81	3.25	
80-99% OF MSA/MD MEDIAN	6983	197	69			128				2.66	
100-119% OF MSA/MD MEDIAN	5623	458	108	151	144	55				2.49	
120% OR MORE OF MSA/MD MEDIAN	49578	3828	933	1225	840	704			126	2.51	
INCOME NOT AVAILABLE 6/	909	125	125							1.76	
<b>GENDER 19/</b>											
MALE	18229	1995	719	455	348	154		112	207	2.73	
FEMALE	8651	693	123	30	232	308				2.90	
JOINT (MALE/FEMALE)	40849	3020	605	1123	740	511		41		2.43	
GENDER NOT AVAILABLE 6/	2651	65			65					2.80	
<b>CENSUS TRACT CHARACTERISTICS 10/</b>											
<b>RACIAL/ETHNIC COMPOSITION 11/</b>											
LESS THAN 10% MINORITY	18609	3483	747	885	1126	558		41	126	2.62	
10-19% MINORITY	26877	1201	396	349	144	231			81	2.54	
20-49% MINORITY	23969	896	184	301	115	184		112		2.65	
50-79% MINORITY	851	193	120	73						2.01	
80-100% MINORITY	74									1.76	
<b>INCOME CHARACTERISTICS 12/ 13/</b>											
LOW INCOME											
MODERATE INCOME	1739	375	151	224						2.11	
MIDDLE INCOME	30898	3448	836	404	1249	680		153	126	2.76	
UPPER INCOME	37743	1950	460	980	136	293			81	2.38	

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BORROWER OR CENSUS TRACT CHARACTERISTICS	15/ NO REPORTED PRICING DATA #	REPORTED PRICING DATA #	PERCENTAGE POINTS ABOVE AVERAGE PRIME OFFER RATE: ONLY INCLUDES LOANS WITH APR ABOVE THE THRESHOLD 16/							MEAN	MEDIAN
			3.50 - 3.99 #	4.00 - 4.49 #	4.50 - 4.99 #	5.00 - 5.99 #	6.00 - 6.99 #	7 OR MORE #			
<b>BORROWER CHARACTERISTICS</b>											
RACE 5/											
AMERICAN INDIAN/ALASKA NATIVE											
ASIAN											
BLACK OR AFRICAN AMERICAN	1										
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND											
WHITE	8										
2 OR MORE MINORITY RACES											
JOINT (WHITE/MINORITY RACE)											
RACE NOT AVAILABLE 6/											
ETHNICITY 7/											
HISPANIC OR LATINO											
NOT HISPANIC OR LATINO	9										
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)											
ETHNICITY NOT AVAILABLE 6/											
MINORITY STATUS 8/											
WHITE NON-HISPANIC	8										
OTHERS, INCLUDING HISPANIC	1										
INCOME 9/											
LESS THAN 50% OF MSA/MD MEDIAN											
50-79% OF MSA/MD MEDIAN	3										
80-99% OF MSA/MD MEDIAN	2										
100-119% OF MSA/MD MEDIAN	1										
120% OR MORE OF MSA/MD MEDIAN	3										
INCOME NOT AVAILABLE 6/											
GENDER 19/											
MALE	4										
FEMALE	1										
JOINT (MALE/FEMALE)	4										
GENDER NOT AVAILABLE 6/											
<b>CENSUS TRACT CHARACTERISTICS 10/</b>											
RACIAL/ETHNIC COMPOSITION 11/											
LESS THAN 10% MINORITY	2										
10-19% MINORITY	5										
20-49% MINORITY	2										
50-79% MINORITY											
80-100% MINORITY											
INCOME CHARACTERISTICS 12/ 13/											
LOW INCOME											
MODERATE INCOME											
MIDDLE INCOME	5										
UPPER INCOME	4										

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BORROWER OR CENSUS TRACT CHARACTERISTICS	15/ NO REPORTED PRICING DATA \$000's	REPORTED PRICING DATA \$000's	PERCENTAGE POINTS ABOVE AVERAGE PRIME OFFER RATE: ONLY INCLUDES LOANS WITH APR ABOVE THE THRESHOLD 16/							MEAN 30/ \$000's	MEDIAN 31/ \$000's
			3.50 - 3.99 \$000's	4.00 - 4.49 \$000's	4.50 - 4.99 \$000's	5.00 - 5.99 \$000's	6.00 - 6.99 \$000's	7 OR MORE \$000's			
<b>BORROWER CHARACTERISTICS</b>											
RACE 5/											
AMERICAN INDIAN/ALASKA NATIVE											
ASIAN											
BLACK OR AFRICAN AMERICAN	41										
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND											
WHITE	129										
2 OR MORE MINORITY RACES											
JOINT (WHITE/MINORITY RACE)											
RACE NOT AVAILABLE 6/											
ETHNICITY 7/											
HISPANIC OR LATINO											
NOT HISPANIC OR LATINO	170										
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)											
ETHNICITY NOT AVAILABLE 6/											
MINORITY STATUS 8/											
WHITE NON-HISPANIC	129										
OTHERS, INCLUDING HISPANIC	41										
INCOME 9/											
LESS THAN 50% OF MSA/MD MEDIAN											
50-79% OF MSA/MD MEDIAN	21										
80-99% OF MSA/MD MEDIAN	32										
100-119% OF MSA/MD MEDIAN	15										
120% OR MORE OF MSA/MD MEDIAN	102										
INCOME NOT AVAILABLE 6/											
GENDER 19/											
MALE	39										
FEMALE	14										
JOINT (MALE/FEMALE)	117										
GENDER NOT AVAILABLE 6/											
<b>CENSUS TRACT CHARACTERISTICS 10/</b>											
RACIAL/ETHNIC COMPOSITION 11/											
LESS THAN 10% MINORITY	21										
10-19% MINORITY	132										
20-49% MINORITY	17										
50-79% MINORITY											
80-100% MINORITY											
INCOME CHARACTERISTICS 12/ 13/											
LOW INCOME											
MODERATE INCOME											
MIDDLE INCOME	80										
UPPER INCOME	90										

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BORROWER OR CENSUS TRACT CHARACTERISTICS	15/ NO REPORTED PRICING DATA #	REPORTED PRICING DATA #	PERCENTAGE POINTS ABOVE AVERAGE PRIME OFFER RATE: ONLY INCLUDES LOANS WITH APR ABOVE THE THRESHOLD 16/						MEAN	MEDIAN	HOEPA LOANS 17/ #
			1.50 - 1.99 #	2.00 - 2.49 #	2.50 - 2.99 #	3.00 - 3.99 #	4.00 - 4.99 #	5 OR MORE #			
<b>BORROWER CHARACTERISTICS</b>											
<b>RACE 5/</b>											
AMERICAN INDIAN/ALASKA NATIVE	1										
ASIAN	4										
BLACK OR AFRICAN AMERICAN	50	5	3		1	1		2.21	1.85		
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND	1										
WHITE	304	9	5	1	3			2.08	1.93	1	
2 OR MORE MINORITY RACES											
JOINT (WHITE/MINORITY RACE)	7	1	1					1.50	1.50		
RACE NOT AVAILABLE 6/	35	1			1			2.91	2.91		
<b>ETHNICITY 7/</b>											
HISPANIC OR LATINO	11										
NOT HISPANIC OR LATINO	356	16	9	1	5	1		2.14	1.91	1	
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	4										
ETHNICITY NOT AVAILABLE 6/	31										
<b>MINORITY STATUS 8/</b>											
WHITE NON-HISPANIC	289	9	5	1	3			2.08	1.93	1	
OTHERS, INCLUDING HISPANIC	75	6	4		1	1		2.09	1.85		
<b>INCOME 9/</b>											
LESS THAN 50% OF MSA/MD MEDIAN	18	1	1					1.60	1.60		
50-79% OF MSA/MD MEDIAN	73	1	1					1.50	1.50	1	
80-99% OF MSA/MD MEDIAN	74	3	3					1.66	1.63		
100-119% OF MSA/MD MEDIAN	43										
120% OR MORE OF MSA/MD MEDIAN	153										
INCOME NOT AVAILABLE 6/	41	11	4	1	5	1		2.37	2.59		
<b>GENDER 19/</b>											
MALE	131	6	4		2			2.06	1.87	1	
FEMALE	89	4	3		1			2.01	1.89		
JOINT (MALE/FEMALE)	171	6	2	1	2	1		2.30	2.41		
GENDER NOT AVAILABLE 6/	11										
<b>CENSUS TRACT CHARACTERISTICS 10/</b>											
<b>RACIAL/ETHNIC COMPOSITION 11/</b>											
LESS THAN 10% MINORITY	86	2			2			2.78	2.78		
10-19% MINORITY	116	4	1		3			2.37	2.64		
20-49% MINORITY	194	10	8	1		1		1.92	1.85	1	
50-79% MINORITY	6										
80-100% MINORITY											
<b>INCOME CHARACTERISTICS 12/ 13/</b>											
<b>LOW INCOME</b>											
MODERATE INCOME	12	1	1					1.93	1.93		
MIDDLE INCOME	258	11	6	1	3	1		2.16	1.89	1	
UPPER INCOME	132	4	2		2			2.13	2.05		

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BORROWER OR CENSUS TRACT CHARACTERISTICS	15/ NO REPORTED PRICING DATA \$000's	REPORTED PRICING DATA \$000's	PERCENTAGE POINTS ABOVE AVERAGE PRIME OFFER RATE: ONLY INCLUDES LOANS WITH APR ABOVE THE THRESHOLD 16/							HOEPA LOANS 17/ \$000's
			1.50 - 1.99 \$000's	2.00 - 2.49 \$000's	2.50 - 2.99 \$000's	3.00 - 3.99 \$000's	4.00 - 4.99 \$000's	5 OR MORE \$000's	MEAN 30/ \$000's	
<b>BORROWER CHARACTERISTICS</b>										
<b>RACE 5/</b>										
AMERICAN INDIAN/ALASKA NATIVE	111									
ASIAN	391									
BLACK OR AFRICAN AMERICAN	6996	599	312		235		52		2.23	1.85
NATIVE HAWAIIAN/OTHER PACIFIC ISLND	114									
WHITE	41261	637	363	72	202				2.07	1.93
2 OR MORE MINORITY RACES										
JOINT (WHITE/MINORITY RACE)	1118	105	105						1.50	1.50
RACE NOT AVAILABLE 6/	4068	62			62				2.91	2.91
<b>ETHNICITY 7/</b>										
HISPANIC OR LATINO	1441									
NOT HISPANIC OR LATINO	48534	1403	780	72	499		52		2.13	1.89
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	477									
ETHNICITY NOT AVAILABLE 6/	3607									
<b>MINORITY STATUS 8/</b>										
WHITE NON-HISPANIC	39223	637	363	72	202				2.07	1.93
OTHERS, INCLUDING HISPANIC	10341	704	417		235		52		2.12	1.85
<b>INCOME 9/</b>										
LESS THAN 50% OF MSA/MD MEDIAN	1434	90	90						1.60	1.60
50-79% OF MSA/MD MEDIAN	7826	105	105						1.50	1.50
80-99% OF MSA/MD MEDIAN	9212	216	216						1.69	1.63
100-119% OF MSA/MD MEDIAN	5372									
120% OR MORE OF MSA/MD MEDIAN	24315									
INCOME NOT AVAILABLE 6/	5900	992	369	72	499		52		2.34	2.59
<b>GENDER 19/</b>										
MALE	16591	590	293		297				2.20	2.59
FEMALE	10793	373	317		56				1.92	1.84
JOINT (MALE/FEMALE)	25279	440	170	72	146		52		2.22	2.13
GENDER NOT AVAILABLE 6/	1396									
<b>CENSUS TRACT CHARACTERISTICS 10/</b>										
<b>RACIAL/ETHNIC COMPOSITION 11/</b>										
LESS THAN 10% MINORITY	11895	118			118				2.79	2.91
10-19% MINORITY	17394	451	70		381				2.46	2.59
20-49% MINORITY	24288	834	710	72			52		1.86	1.84
50-79% MINORITY	482									
80-100% MINORITY										
<b>INCOME CHARACTERISTICS 12/ 13/</b>										
<b>LOW INCOME</b>										
MODERATE INCOME	1068	75	75						1.93	1.93
MIDDLE INCOME	32429	856	530	72	202		52		2.10	1.85
UPPER INCOME	20562	472	175		297				2.23	2.59

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BORROWER OR CENSUS TRACT CHARACTERISTICS	15/ NO REPORTED PRICING DATA #	REPORTED PRICING DATA #	PERCENTAGE POINTS ABOVE AVERAGE PRIME OFFER RATE: ONLY INCLUDES LOANS WITH APR ABOVE THE THRESHOLD 16/					MEAN	MEDIAN	HOEPA LOANS 17/ #
			1.50 - 1.99 #	2.00 - 2.49 #	2.50 - 2.99 #	3.00 - 3.99 #	4.00 - 4.99 #			
<b>BORROWER CHARACTERISTICS</b>										
<b>RACE 5/</b>										
AMERICAN INDIAN/ALASKA NATIVE	3									
ASIAN	8									
BLACK OR AFRICAN AMERICAN	116	6	5	1			1.76	1.67		
NATIVE HAWAIIAN/OTHER PACIFIC ISLND	3									
WHITE	548	7	3	4			2.00	2.01		
2 OR MORE MINORITY RACES										
JOINT (WHITE/MINORITY RACE)	42									
RACE NOT AVAILABLE 6/	111	5	4	1			1.95	1.96		
<b>ETHNICITY 7/</b>										
HISPANIC OR LATINO	42	2	1	1			2.01	2.01		
NOT HISPANIC OR LATINO	662	11	7	4			1.87	1.81		
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	17									
ETHNICITY NOT AVAILABLE 6/	110	5	4	1			1.95	1.96		
<b>MINORITY STATUS 8/</b>										
WHITE NON-HISPANIC	494	5	2	3			2.00	2.01		
OTHERS, INCLUDING HISPANIC	223	8	6	2			1.82	1.72		
<b>INCOME 9/</b>										
LESS THAN 50% OF MSA/MD MEDIAN	4									
50-79% OF MSA/MD MEDIAN	33	1	1				1.96	1.96		
80-99% OF MSA/MD MEDIAN	51	2	1	1			1.90	1.90		
100-119% OF MSA/MD MEDIAN	43	4	4				1.83	1.85		
120% OR MORE OF MSA/MD MEDIAN	167	11	6	5			1.93	1.89		
INCOME NOT AVAILABLE 6/	533									
<b>GENDER 19/</b>										
MALE	319	7	3	4			1.98	2.01		
FEMALE	67	2	2				1.67	1.67		
JOINT (MALE/FEMALE)	380	4	3	1			1.84	1.78		
GENDER NOT AVAILABLE 6/	65	5	4	1			1.95	1.96		
<b>CENSUS TRACT CHARACTERISTICS 10/</b>										
<b>RACIAL/ETHNIC COMPOSITION 11/</b>										
LESS THAN 10% MINORITY	90	1	1				1.79	1.79		
10-19% MINORITY	196	5	2	3			2.03	2.01		
20-49% MINORITY	541	12	9	3			1.87	1.79		
50-79% MINORITY	4									
80-100% MINORITY										
<b>INCOME CHARACTERISTICS 12/ 13/</b>										
LOW INCOME										
MODERATE INCOME	6									
MIDDLE INCOME	599	15	11	4			1.88	1.81		
UPPER INCOME	226	3	1	2			2.05	2.11		

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BORROWER OR CENSUS TRACT CHARACTERISTICS	15/ NO REPORTED PRICING DATA \$000's	REPORTED PRICING DATA \$000's	PERCENTAGE POINTS ABOVE AVERAGE PRIME OFFER RATE: ONLY INCLUDES LOANS WITH APR ABOVE THE THRESHOLD 16/					MEAN 30/ \$000's	MEDIAN 31/ \$000's	HOEPA LOANS 17/ \$000's
			1.50 - 1.99 \$000's	2.00 - 2.49 \$000's	2.50 - 2.99 \$000's	3.00 - 3.99 \$000's	4.00 - 4.99 \$000's			
<b>BORROWER CHARACTERISTICS</b>										
<b>RACE 5/</b>										
AMERICAN INDIAN/ALASKA NATIVE	589									
ASIAN	955									
BLACK OR AFRICAN AMERICAN	18662	911	730	181				1.77	1.66	
NATIVE HAWAIIAN/OTHER PACIFIC ISLND	549									
WHITE	88896	1220	652	568				1.98	1.90	
2 OR MORE MINORITY RACES										
JOINT (WHITE/MINORITY RACE)	7236									
RACE NOT AVAILABLE 6/	16145	587	437	150				1.99	1.96	
<b>ETHNICITY 7/</b>										
HISPANIC OR LATINO	5782	237	125	112				2.00	1.90	
NOT HISPANIC OR LATINO	108252	1894	1257	637				1.87	1.89	
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	2720									
ETHNICITY NOT AVAILABLE 6/	16278	587	437	150				1.99	1.96	
<b>MINORITY STATUS 8/</b>										
WHITE NON-HISPANIC	80860	983	527	456				1.97	1.89	
OTHERS, INCLUDING HISPANIC	35369	1148	855	293				1.82	1.67	
<b>INCOME 9/</b>										
LESS THAN 50% OF MSA/MD MEDIAN	621									
50-79% OF MSA/MD MEDIAN	3946	131	131					1.96	1.96	
80-99% OF MSA/MD MEDIAN	6758	231	119	112				1.89	1.67	
100-119% OF MSA/MD MEDIAN	6486	482	482					1.82	1.90	
120% OR MORE OF MSA/MD MEDIAN	30366	1874	1087	787				1.93	1.89	
INCOME NOT AVAILABLE 6/	84855									
<b>GENDER 19/</b>										
MALE	48486	1025	402	623				1.99	2.01	
FEMALE	9180	259	259					1.66	1.66	
JOINT (MALE/FEMALE)	66454	847	721	126				1.84	1.89	
GENDER NOT AVAILABLE 6/	8912	587	437	150				1.99	1.96	
<b>CENSUS TRACT CHARACTERISTICS 10/</b>										
<b>RACIAL/ETHNIC COMPOSITION 11/</b>										
LESS THAN 10% MINORITY	14714	99	99					1.79	1.79	
10-19% MINORITY	35984	1004	493	511				2.00	2.01	
20-49% MINORITY	81980	1615	1227	388				1.86	1.77	
50-79% MINORITY	354									
80-100% MINORITY										
<b>INCOME CHARACTERISTICS 12/ 13/</b>										
<b>LOW INCOME</b>										
MODERATE INCOME	598									
MIDDLE INCOME	87242	2008	1444	564				1.88	1.81	
UPPER INCOME	45192	710	375	335				2.00	1.89	

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BORROWER OR CENSUS TRACT CHARACTERISTICS	15/ NO REPORTED PRICING DATA #	REPORTED PRICING DATA #	PERCENTAGE POINTS ABOVE AVERAGE PRIME OFFER RATE: ONLY INCLUDES LOANS WITH APR ABOVE THE THRESHOLD 16/							MEAN	MEDIAN	HOEPA LOANS 17/ #
			1.50 - 1.99 #	2.00 - 2.49 #	2.50 - 2.99 #	3.00 - 3.99 #	4.00 - 4.99 #	5 OR MORE #				
<b>BORROWER CHARACTERISTICS</b>												
<b>RACE 5/</b>												
AMERICAN INDIAN/ALASKA NATIVE	8											
ASIAN	16	1	1						1.98	1.98		
BLACK OR AFRICAN AMERICAN	63	14	5	3	1	1		4	3.41	2.35		
NATIVE HAWAIIAN/OTHER PACIFIC ISLND	1											
WHITE	1333	91	27	21	22	7	5	9	2.82	2.39		
2 OR MORE MINORITY RACES	1											
JOINT (WHITE/MINORITY RACE)	21	1		1					2.42	2.42		
RACE NOT AVAILABLE 6/	111											
<b>ETHNICITY 7/</b>												
HISPANIC OR LATINO	15											
NOT HISPANIC OR LATINO	1400	106	33	24	23	8	5	13	2.90	2.41		
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	21											
ETHNICITY NOT AVAILABLE 6/	118	1		1					2.30	2.30		
<b>MINORITY STATUS 8/</b>												
WHITE NON-HISPANIC	1285	90	27	20	22	7	5	9	2.83	2.42		
OTHERS, INCLUDING HISPANIC	143	16	6	4	1	1		4	3.26	2.33		
<b>INCOME 9/</b>												
LESS THAN 50% OF MSA/MD MEDIAN	81	14	6	1	1	2	1	3	3.31	2.63		
50-79% OF MSA/MD MEDIAN	223	29	7	9	9	3		1	2.55	2.39		
80-99% OF MSA/MD MEDIAN	193	15	3	2	4		2	4	3.82	2.83		
100-119% OF MSA/MD MEDIAN	171	12	5	2	4			1	2.41	2.22		
120% OR MORE OF MSA/MD MEDIAN	841	37	12	11	5	3	2	4	2.78	2.29		
INCOME NOT AVAILABLE 6/	45											
<b>GENDER 19/</b>												
MALE	354	31	11	7	5	4	1	3	2.84	2.39		
FEMALE	262	20	6	4	2	1	2	5	3.50	2.53		
JOINT (MALE/FEMALE)	874	56	16	14	16	3	2	5	2.70	2.39		
GENDER NOT AVAILABLE 6/	64											
<b>CENSUS TRACT CHARACTERISTICS 10/</b>												
<b>RACIAL/ETHNIC COMPOSITION 11/</b>												
LESS THAN 10% MINORITY	495	44	8	11	13	6	2	4	2.94	2.62		
10-19% MINORITY	599	25	12	6	3		1	3	2.51	2.01		
20-49% MINORITY	429	30	10	6	5	1	2	6	3.28	2.30		
50-79% MINORITY	27	7	3	2	1	1			2.28	2.36		
80-100% MINORITY	4	1			1				2.79	2.79		
<b>INCOME CHARACTERISTICS 12/ 13/</b>												
LOW INCOME												
MODERATE INCOME	47	13	4	4	3	1		1	2.73	2.36		
MIDDLE INCOME	810	60	16	13	16	5	2	8	2.98	2.54		
UPPER INCOME	697	34	13	8	4	2	3	4	2.80	2.28		

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BORROWER OR CENSUS TRACT CHARACTERISTICS	15/ NO REPORTED PRICING DATA \$000's	REPORTED PRICING DATA \$000's	PERCENTAGE POINTS ABOVE AVERAGE PRIME OFFER RATE: ONLY INCLUDES LOANS WITH APR ABOVE THE THRESHOLD 16/							MEAN 30/	MEDIAN 31/	HOEPA LOANS 17/ \$000's
			1.50 - 1.99 \$000's	2.00 - 2.49 \$000's	2.50 - 2.99 \$000's	3.00 - 3.99 \$000's	4.00 - 4.99 \$000's	5 OR MORE \$000's				
<b>BORROWER CHARACTERISTICS</b>												
<b>RACE 5/</b>												
AMERICAN INDIAN/ALASKA NATIVE	924											
ASIAN	2614	213	213						1.98	1.98		
BLACK OR AFRICAN AMERICAN	6661	988	247	282	62	35		362	3.84	2.45		
NATIVE HAWAIIAN/OTHER PACIFIC ISLND	115											
WHITE	190320	9913	2807	3078	2330	612	442	644	2.64	2.29		
2 OR MORE MINORITY RACES	145											
JOINT (WHITE/MINORITY RACE)	3243	28		28					2.42	2.42		
RACE NOT AVAILABLE 6/	16231											
<b>ETHNICITY 7/</b>												
HISPANIC OR LATINO	1483											
NOT HISPANIC OR LATINO	198533	10938	3267	3184	2392	647	442	1006	2.74	2.24		
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	3087											
ETHNICITY NOT AVAILABLE 6/	17150	204		204					2.30	2.30		
<b>MINORITY STATUS 8/</b>												
WHITE NON-HISPANIC	183718	9709	2807	2874	2330	612	442	644	2.64	2.28		
OTHERS, INCLUDING HISPANIC	17990	1229	460	310	62	35		362	3.49	2.24		
<b>INCOME 9/</b>												
LESS THAN 50% OF MSA/MD MEDIAN	6100	730	343	45	57	68	42	175	3.18	2.45		
50-79% OF MSA/MD MEDIAN	19723	1817	493	556	429	228		111	2.68	2.39		
80-99% OF MSA/MD MEDIAN	21373	1748	226	512	585		75	350	3.38	2.73		
100-119% OF MSA/MD MEDIAN	19385	1453	674	171	604			4	2.19	2.15		
120% OR MORE OF MSA/MD MEDIAN	147957	5394	1531	2104	717	351	325	366	2.62	2.18		
INCOME NOT AVAILABLE 6/	5715											
<b>GENDER 19/</b>												
MALE	48342	3294	1107	1067	366	226	240	288	2.76	2.14		
FEMALE	27338	1435	524	187	69	91	106	458	3.76	2.61		
JOINT (MALE/FEMALE)	134741	6413	1636	2134	1957	330	96	260	2.48	2.29		
GENDER NOT AVAILABLE 6/	9832											
<b>CENSUS TRACT CHARACTERISTICS 10/</b>												
<b>RACIAL/ETHNIC COMPOSITION 11/</b>												
LESS THAN 10% MINORITY	69820	5627	773	2083	1590	489	251	441	2.81	2.44		
10-19% MINORITY	95210	2401	1414	664	166		85	72	2.11	1.82		
20-49% MINORITY	52825	2746	1001	526	585	35	106	493	3.13	2.28		
50-79% MINORITY	2216	342	79	115	25	123			2.54	2.45		
80-100% MINORITY	182	26			26				2.79	2.79		
<b>INCOME CHARACTERISTICS 12/ 13/</b>												
LOW INCOME												
MODERATE INCOME	3664	701	117	338	97	123		26	2.59	2.36		
MIDDLE INCOME	100255	6810	1672	1969	1979	357	106	727	2.80	2.30		
UPPER INCOME	116334	3631	1478	1081	316	167	336	253	2.62	2.10		

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BORROWER OR CENSUS TRACT CHARACTERISTICS	15/ NO REPORTED PRICING DATA #	REPORTED PRICING DATA #	PERCENTAGE POINTS ABOVE AVERAGE PRIME OFFER RATE: ONLY INCLUDES LOANS WITH APR ABOVE THE THRESHOLD 16/							MEAN	MEDIAN	HOEPA LOANS 17/ #
			3.50 - 3.99 #	4.00 - 4.49 #	4.50 - 4.99 #	5.00 - 5.99 #	6.00 - 6.99 #	7 OR MORE #				
<b>BORROWER CHARACTERISTICS</b>												
<b>RACE 5/</b>												
AMERICAN INDIAN/ALASKA NATIVE												
ASIAN												
BLACK OR AFRICAN AMERICAN	2											
NATIVE HAWAIIAN/OTHER PACIFIC ISLND												
WHITE	31	9	1	1	4	1	1	1	5.12	4.77	1	
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)		1	1						3.87	3.87		
RACE NOT AVAILABLE 6/												
<b>ETHNICITY 7/</b>												
HISPANIC OR LATINO												
NOT HISPANIC OR LATINO	33	10	2	1	4	1	1	1	5.00	4.74	1	
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)												
ETHNICITY NOT AVAILABLE 6/												
<b>MINORITY STATUS 8/</b>												
WHITE NON-HISPANIC	31	9	1	1	4	1	1	1	5.12	4.77	1	
OTHERS, INCLUDING HISPANIC	2	1	1						3.87	3.87		
<b>INCOME 9/</b>												
LESS THAN 50% OF MSA/MD MEDIAN	3	1						1	6.93	6.93		
50-79% OF MSA/MD MEDIAN	1	3		1	1			1	5.37	4.86		
80-99% OF MSA/MD MEDIAN	1											
100-119% OF MSA/MD MEDIAN	3	1	1						3.93	3.93		
120% OR MORE OF MSA/MD MEDIAN	24	5	1		3	1			4.60	4.70	1	
INCOME NOT AVAILABLE 6/	1											
<b>GENDER 19/</b>												
MALE	5	3		1	1			1	5.37	4.86		
FEMALE	4	1						1	6.93	6.93		
JOINT (MALE/FEMALE)	24	6	2		3	1			4.49	4.67	1	
GENDER NOT AVAILABLE 6/												
<b>CENSUS TRACT CHARACTERISTICS 10/</b>												
<b>RACIAL/ETHNIC COMPOSITION 11/</b>												
LESS THAN 10% MINORITY	17	1				1			5.01	5.01		
10-19% MINORITY	10	5	2		2			1	4.83	4.64	1	
20-49% MINORITY	6	4		1	2			1	5.20	4.78		
50-79% MINORITY												
80-100% MINORITY												
<b>INCOME CHARACTERISTICS 12/ 13/</b>												
<b>LOW INCOME</b>												
MODERATE INCOME												
MIDDLE INCOME	25	4		1	2			1	5.20	4.78		
UPPER INCOME	8	6	2		2	1		1	4.86	4.71	1	

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BORROWER OR CENSUS TRACT CHARACTERISTICS	15/ NO REPORTED PRICING DATA \$000's	REPORTED PRICING DATA \$000's	PERCENTAGE POINTS ABOVE AVERAGE PRIME OFFER RATE: ONLY INCLUDES LOANS WITH APR ABOVE THE THRESHOLD 16/							MEAN 30/ \$000's	MEDIAN 31/ \$000's	HOEPA LOANS 17/ \$000's
			3.50 - 3.99 \$000's	4.00 - 4.49 \$000's	4.50 - 4.99 \$000's	5.00 - 5.99 \$000's	6.00 - 6.99 \$000's	7 OR MORE \$000's				
<b>BORROWER CHARACTERISTICS</b>												
<b>RACE 5/</b>												
AMERICAN INDIAN/ALASKA NATIVE												
ASIAN												
BLACK OR AFRICAN AMERICAN	44											
NATIVE HAWAIIAN/OTHER PACIFIC ISLND												
WHITE	1516	241	4	12	156	37	2	30	5.05	4.77	23	
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)		41	41						3.87	3.87		
RACE NOT AVAILABLE 6/												
<b>ETHNICITY 7/</b>												
HISPANIC OR LATINO												
NOT HISPANIC OR LATINO	1560	282	45	12	156	37	2	30	4.88	4.77	23	
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)												
ETHNICITY NOT AVAILABLE 6/												
<b>MINORITY STATUS 8/</b>												
WHITE NON-HISPANIC	1516	241	4	12	156	37	2	30	5.05	4.77	23	
OTHERS, INCLUDING HISPANIC	44	41	41						3.87	3.87		
<b>INCOME 9/</b>												
LESS THAN 50% OF MSA/MD MEDIAN	68	2						2	6.93	6.93		
50-79% OF MSA/MD MEDIAN	76	62		12	20			30	5.79	4.86		
80-99% OF MSA/MD MEDIAN	28											
100-119% OF MSA/MD MEDIAN	86	4	4						3.93	3.93		
120% OR MORE OF MSA/MD MEDIAN	1274	214	41		136	37			4.61	4.70	23	
INCOME NOT AVAILABLE 6/	28											
<b>GENDER 19/</b>												
MALE	229	62		12	20			30	5.79	4.86		
FEMALE	70	2						2	6.93	6.93		
JOINT (MALE/FEMALE)	1261	218	45		136	37			4.59	4.70	23	
GENDER NOT AVAILABLE 6/												
<b>CENSUS TRACT CHARACTERISTICS 10/</b>												
<b>RACIAL/ETHNIC COMPOSITION 11/</b>												
LESS THAN 10% MINORITY	704	37				37			5.01	5.01		
10-19% MINORITY	459	128	45		81			2	4.47	4.64	23	
20-49% MINORITY	397	117		12	75			30	5.28	4.70		
50-79% MINORITY												
80-100% MINORITY												
<b>INCOME CHARACTERISTICS 12/ 13/</b>												
<b>LOW INCOME</b>												
MODERATE INCOME												
MIDDLE INCOME	1008	117		12	75			30	5.28	4.70		
UPPER INCOME	552	165	45		81	37	2		4.59	4.77	23	

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BORROWER OR CENSUS TRACT CHARACTERISTICS	15/ NO REPORTED PRICING DATA #	REPORTED PRICING DATA #	PERCENTAGE POINTS ABOVE AVERAGE PRIME OFFER RATE: ONLY INCLUDES LOANS WITH APR ABOVE THE THRESHOLD 16/							MEAN	MEDIAN	HOEPA LOANS 17/ #
			1.50 - 1.99 #	2.00 - 2.49 #	2.50 - 2.99 #	3.00 - 3.99 #	4.00 - 4.99 #	5 OR MORE #				
<b>BORROWER CHARACTERISTICS</b>												
<b>RACE 5/</b>												
AMERICAN INDIAN/ALASKA NATIVE	1											
ASIAN												
BLACK OR AFRICAN AMERICAN	1	2		1		1			2.99	2.99		
NATIVE HAWAIIAN/OTHER PACIFIC ISLND												
WHITE	55	18	4	2	3	4	3	2	3.38	2.89		
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)	1	1						1	7.29	7.29		
RACE NOT AVAILABLE 6/	5											
<b>ETHNICITY 7/</b>												
HISPANIC OR LATINO	2	1						1	7.33	7.33		
NOT HISPANIC OR LATINO	54	20	4	3	3	5	3	2	3.34	2.89		
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)												
ETHNICITY NOT AVAILABLE 6/	7											
<b>MINORITY STATUS 8/</b>												
WHITE NON-HISPANIC	52	17	4	2	3	4	3	1	3.15	2.72		
OTHERS, INCLUDING HISPANIC	5	4		1		1		2	5.15	5.62		
<b>INCOME 9/</b>												
LESS THAN 50% OF MSA/MD MEDIAN	8	2		1		1			2.99	2.99		
50-79% OF MSA/MD MEDIAN	13	6	1	1	2	1	1		2.78	2.62		
80-99% OF MSA/MD MEDIAN	3	2	1		1				2.13	2.13		
100-119% OF MSA/MD MEDIAN	7	3	1				1	1	4.51	4.68		
120% OR MORE OF MSA/MD MEDIAN	31	8	1	1		3	1	2	4.20	3.58		
INCOME NOT AVAILABLE 6/	1											
<b>GENDER 19/</b>												
MALE	12	5		1		2	1	1	4.21	3.85		
FEMALE	9	5		1	2	1	1		3.25	2.66		
JOINT (MALE/FEMALE)	38	11	4	1	1	2	1	2	3.34	2.72		
GENDER NOT AVAILABLE 6/	4											
<b>CENSUS TRACT CHARACTERISTICS 10/</b>												
<b>RACIAL/ETHNIC COMPOSITION 11/</b>												
LESS THAN 10% MINORITY	17	8	2	1	1	2	2		3.01	2.86		
10-19% MINORITY	25	6	2	1		2		1	3.23	2.81		
20-49% MINORITY	19	5		1	1		1	2	4.78	4.68		
50-79% MINORITY	2	2			1	1			3.33	3.33		
80-100% MINORITY												
<b>INCOME CHARACTERISTICS 12/ 13/</b>												
<b>LOW INCOME</b>												
MODERATE INCOME	3	3			1	1		1	4.65	3.94		
MIDDLE INCOME	34	14	3	3	2	2	2	2	3.33	2.62		
UPPER INCOME	26	4	1			2	1		3.37	3.53		

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BORROWER OR CENSUS TRACT CHARACTERISTICS	15/ NO REPORTED PRICING DATA \$000's	REPORTED PRICING DATA \$000's	PERCENTAGE POINTS ABOVE AVERAGE PRIME OFFER RATE: ONLY INCLUDES LOANS WITH APR ABOVE THE THRESHOLD 16/							MEAN 30/	MEDIAN 31/	HOEPA LOANS 17/ \$000's
			1.50 - 1.99 \$000's	2.00 - 2.49 \$000's	2.50 - 2.99 \$000's	3.00 - 3.99 \$000's	4.00 - 4.99 \$000's	5 OR MORE \$000's				
<b>BORROWER CHARACTERISTICS</b>												
<b>RACE 5/</b>												
AMERICAN INDIAN/ALASKA NATIVE	85											
ASIAN												
BLACK OR AFRICAN AMERICAN	75	84		26		58			3.35	3.94		
NATIVE HAWAIIAN/OTHER PACIFIC ISLND												
WHITE	4461	980	214	43	162	89	280	192	3.98	3.85		
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)	42	21						21	7.29	7.29		
RACE NOT AVAILABLE 6/	222											
<b>ETHNICITY 7/</b>												
HISPANIC OR LATINO	61	110						110	7.33	7.33		
NOT HISPANIC OR LATINO	4368	975	214	69	162	147	280	103	3.62	3.30		
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)												
ETHNICITY NOT AVAILABLE 6/	456											
<b>MINORITY STATUS 8/</b>												
WHITE NON-HISPANIC	4251	870	214	43	162	89	280	82	3.55	3.20		
OTHERS, INCLUDING HISPANIC	263	215		26		58		131	5.77	7.33		
<b>INCOME 9/</b>												
LESS THAN 50% OF MSA/MD MEDIAN	297	84		26		58			3.35	3.94		
50-79% OF MSA/MD MEDIAN	661	302	88	18	136	10	50		2.67	2.57		
80-99% OF MSA/MD MEDIAN	309	47	21		26				2.19	2.72		
100-119% OF MSA/MD MEDIAN	342	166	50				95	21	4.07	4.68		
120% OR MORE OF MSA/MD MEDIAN	3268	486	55	25		79	135	192	5.07	4.93		
INCOME NOT AVAILABLE 6/	8											
<b>GENDER 19/</b>												
MALE	867	233		18		55	50	110	5.46	4.62		
FEMALE	373	314		25	136	58	95		3.46	2.66		
JOINT (MALE/FEMALE)	3394	538	214	26	26	34	135	103	3.67	3.05		
GENDER NOT AVAILABLE 6/	251											
<b>CENSUS TRACT CHARACTERISTICS 10/</b>												
<b>RACIAL/ETHNIC COMPOSITION 11/</b>												
LESS THAN 10% MINORITY	1498	420	143	18	40	34	185		3.33	3.05		
10-19% MINORITY	1813	233	71	25		55		82	3.99	3.85		
20-49% MINORITY	1531	348		26	96		95	131	4.90	4.68		
50-79% MINORITY	43	84			26	58			3.56	3.94		
80-100% MINORITY												
<b>INCOME CHARACTERISTICS 12/ 13/</b>												
<b>LOW INCOME</b>												
MODERATE INCOME	63	105			26	58		21	4.31	3.94		
MIDDLE INCOME	1982	742	126	69	136	34	185	192	4.15	4.62		
UPPER INCOME	2840	238	88			55	95		3.35	3.85		

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BORROWER OR CENSUS TRACT CHARACTERISTICS	15/ NO REPORTED PRICING DATA #	REPORTED PRICING DATA #	PERCENTAGE POINTS ABOVE AVERAGE PRIME OFFER RATE: ONLY INCLUDES LOANS WITH APR ABOVE THE THRESHOLD 16/							MEAN	MEDIAN	HOEPA LOANS 17/ #
			3.50 - 3.99 #	4.00 - 4.49 #	4.50 - 4.99 #	5.00 - 5.99 #	6.00 - 6.99 #	7 OR MORE #				
<b>BORROWER CHARACTERISTICS</b>												
<b>RACE 5/</b>												
AMERICAN INDIAN/ALASKA NATIVE												
ASIAN		1				1			5.53	5.53		
BLACK OR AFRICAN AMERICAN	1	1		1					4.36	4.36		
NATIVE HAWAIIAN/OTHER PACIFIC ISLND												
WHITE	35	7	2	1	1	1	1	1	5.15	4.50		
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)	1											
RACE NOT AVAILABLE 6/	2											
<b>ETHNICITY 7/</b>												
HISPANIC OR LATINO	1											
NOT HISPANIC OR LATINO	36	9	2	2	1	2	1	1	5.10	4.50		
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)												
ETHNICITY NOT AVAILABLE 6/	2											
<b>MINORITY STATUS 8/</b>												
WHITE NON-HISPANIC	34	7	2	1	1	1	1	1	5.15	4.50		
OTHERS, INCLUDING HISPANIC	3	2		1		1			4.95	4.95		
<b>INCOME 9/</b>												
LESS THAN 50% OF MSA/MD MEDIAN	1	1			1				4.50	4.50		
50-79% OF MSA/MD MEDIAN	1	1		1					4.25	4.25		
80-99% OF MSA/MD MEDIAN	5	1					1		6.00	6.00		
100-119% OF MSA/MD MEDIAN	4	1						1	8.23	8.23		
120% OR MORE OF MSA/MD MEDIAN	28	5	2	1		2			4.59	4.36		
INCOME NOT AVAILABLE 6/												
<b>GENDER 19/</b>												
MALE	3	1	1						3.86	3.86		
FEMALE	6	3	1		1	1			4.57	4.50		
JOINT (MALE/FEMALE)	28	5		2		1	1	1	5.67	5.50		
GENDER NOT AVAILABLE 6/	2											
<b>CENSUS TRACT CHARACTERISTICS 10/</b>												
<b>RACIAL/ETHNIC COMPOSITION 11/</b>												
LESS THAN 10% MINORITY	23	3		1				1	6.20	6.00		
10-19% MINORITY	9	2	1			1			4.60	4.60		
20-49% MINORITY	5	4	1	1	1	1			4.54	4.38		
50-79% MINORITY	2											
80-100% MINORITY												
<b>INCOME CHARACTERISTICS 12/ 13/</b>												
LOW INCOME												
MODERATE INCOME	2											
MIDDLE INCOME	24	7		2	1	2	1	1	5.48	5.50		
UPPER INCOME	13	2	2						3.78	3.78		

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BORROWER OR CENSUS TRACT CHARACTERISTICS	15/ NO REPORTED PRICING DATA \$000's	REPORTED PRICING DATA \$000's	PERCENTAGE POINTS ABOVE AVERAGE PRIME OFFER RATE: ONLY INCLUDES LOANS WITH APR ABOVE THE THRESHOLD 16/							MEAN 30/	MEDIAN 31/	HOEPA LOANS 17/ \$000's
			3.50 - 3.99 \$000's	4.00 - 4.49 \$000's	4.50 - 4.99 \$000's	5.00 - 5.99 \$000's	6.00 - 6.99 \$000's	7 OR MORE \$000's				
<b>BORROWER CHARACTERISTICS</b>												
<b>RACE 5/</b>												
AMERICAN INDIAN/ALASKA NATIVE												
ASIAN		12				12				5.53	5.53	
BLACK OR AFRICAN AMERICAN	50	22		22						4.36	4.36	
NATIVE HAWAIIAN/OTHER PACIFIC ISLND												
WHITE	963	138	34	5	17	40	20	22		5.42	5.50	
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)	31											
RACE NOT AVAILABLE 6/	32											
<b>ETHNICITY 7/</b>												
HISPANIC OR LATINO	25											
NOT HISPANIC OR LATINO	1019	172	34	27	17	52	20	22		5.30	5.50	
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)												
ETHNICITY NOT AVAILABLE 6/	32											
<b>MINORITY STATUS 8/</b>												
WHITE NON-HISPANIC	938	138	34	5	17	40	20	22		5.42	5.50	
OTHERS, INCLUDING HISPANIC	106	34		22		12				4.77	4.36	
<b>INCOME 9/</b>												
LESS THAN 50% OF MSA/MD MEDIAN	8	17			17					4.50	4.50	
50-79% OF MSA/MD MEDIAN	39	5		5						4.25	4.25	
80-99% OF MSA/MD MEDIAN	75	20					20			6.00	6.00	
100-119% OF MSA/MD MEDIAN	58	22						22		8.23	8.23	
120% OR MORE OF MSA/MD MEDIAN	896	108	34	22		52				4.74	4.36	
INCOME NOT AVAILABLE 6/												
<b>GENDER 19/</b>												
MALE	44	25	25							3.86	3.86	
FEMALE	155	38	9		17	12				4.63	4.50	
JOINT (MALE/FEMALE)	845	109		27		40	20	22		5.86	5.50	
GENDER NOT AVAILABLE 6/	32											
<b>CENSUS TRACT CHARACTERISTICS 10/</b>												
<b>RACIAL/ETHNIC COMPOSITION 11/</b>												
LESS THAN 10% MINORITY	730	64		22			20	22		6.20	6.00	
10-19% MINORITY	174	49	9			40				5.17	5.50	
20-49% MINORITY	154	59	25	5	17	12				4.42	4.25	
50-79% MINORITY	18											
80-100% MINORITY												
<b>INCOME CHARACTERISTICS 12/ 13/</b>												
LOW INCOME												
MODERATE INCOME	18											
MIDDLE INCOME	535	138		27	17	52	20	22		5.66	5.50	
UPPER INCOME	523	34	34							3.82	3.86	

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BORROWER OR CENSUS TRACT CHARACTERISTICS	Applications Received 20/		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	#	\$000's	#	\$000's	#	\$000's	#	\$000's	#	\$000's	#	\$000's
<b>BORROWER CHARACTERISTICS</b>												
<b>RACE 5/</b>												
AMERICAN INDIAN/ALASKA NATIVE	2	111	1	79			1	32				
ASIAN												
BLACK OR AFRICAN AMERICAN	10	414	5	213	3	112	2	89				
NATIVE HAWAIIAN/OTHER PACIFIC ISLND												
WHITE	129	6898	45	2198	32	1386	46	3050	5	227	1	37
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)	3	223	1	58	1	119	1	46				
RACE NOT AVAILABLE 6/	5	314	2	177	1	27	2	110				
<b>ETHNICITY 7/</b>												
HISPANIC OR LATINO	1	23	1	23								
NOT HISPANIC OR LATINO	126	6597	46	2359	34	1558	41	2466	4	177	1	37
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	3	154	1	58			1	46	1	50		
ETHNICITY NOT AVAILABLE 6/	19	1186	6	285	3	86	10	815				
<b>MINORITY STATUS 8/</b>												
WHITE NON-HISPANIC	113	5904	40	2018	30	1327	38	2345	4	177	1	37
OTHERS, INCLUDING HISPANIC	17	821	8	373	4	231	4	167	1	50		
<b>INCOME 9/</b>												
LESS THAN 50% OF MSA/MD MEDIAN	34	1336	10	316	5	182	14	624	4	177	1	37
50-79% OF MSA/MD MEDIAN	44	2392	12	612	13	610	19	1170				
80-99% OF MSA/MD MEDIAN	31	1411	9	299	13	573	8	489	1	50		
100-119% OF MSA/MD MEDIAN	13	1033	5	266	1	17	7	750				
120% OR MORE OF MSA/MD MEDIAN	27	1788	18	1232	5	262	4	294				
INCOME NOT AVAILABLE 6/												
<b>GENDER 19/</b>												
MALE	59	3079	28	1366	11	474	15	1025	4	177	1	37
FEMALE	35	1485	10	416	11	379	14	690				
JOINT (MALE/FEMALE)	51	3202	15	886	14	764	21	1502	1	50		
GENDER NOT AVAILABLE 6/	4	194	1	57	1	27	2	110				
<b>CENSUS TRACT CHARACTERISTICS 10/</b>												
<b>RACIAL/ETHNIC COMPOSITION 11/</b>												
LESS THAN 10% MINORITY	75	4683	31	1929	10	587	29	1962	4	168	1	37
10-19% MINORITY	18	921	8	340	3	233	6	289	1	59		
20-49% MINORITY	49	2085	14	407	21	769	14	909				
50-79% MINORITY	7	271	1	49	3	55	3	167				
80-100% MINORITY												
<b>INCOME CHARACTERISTICS 12/ 13/</b>												
LOW INCOME												
MODERATE INCOME	11	482	2	92	3	55	6	335				
MIDDLE INCOME	94	5641	35	2109	18	1019	35	2249	5	227	1	37
UPPER INCOME	44	1837	17	524	16	570	11	743				

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BORROWER OR CENSUS TRACT CHARACTERISTICS	15/ NO REPORTED PRICING DATA #	REPORTED PRICING DATA #	PERCENTAGE POINTS ABOVE AVERAGE PRIME OFFER RATE: ONLY INCLUDES LOANS WITH APR ABOVE THE THRESHOLD 16/								MEAN	MEDIAN	
			1.50 - 1.99 #	2.00 - 2.49 #	2.50 - 2.99 #	3.00 - 3.99 #	4.00 - 4.99 #	5.00 - 5.99 #	6 OR MORE #				
<b>BORROWER CHARACTERISTICS</b>													
<b>RACE 5/</b>													
AMERICAN INDIAN/ALASKA NATIVE		1				1					3.03	3.03	
ASIAN													
BLACK OR AFRICAN AMERICAN		5								5	8.98	8.45	
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND													
WHITE	1	44	3	2	5	12	3		4	15	5.04	4.17	
2 OR MORE MINORITY RACES													
JOINT (WHITE/MINORITY RACE)		1								1	7.02	7.02	
RACE NOT AVAILABLE 6/		2		1				1			3.28	3.28	
<b>ETHNICITY 7/</b>													
HISPANIC OR LATINO		1								1	8.59	8.59	
NOT HISPANIC OR LATINO	1	45	3	2	5	13	3		4	15	4.97	3.91	
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)		1								1	7.02	7.02	
ETHNICITY NOT AVAILABLE 6/		6		1				1		4	7.35	8.33	
<b>MINORITY STATUS 8/</b>													
WHITE NON-HISPANIC	1	39	3	2	5	12	2		4	11	4.68	3.52	
OTHERS, INCLUDING HISPANIC		8				1				7	7.94	8.25	
<b>INCOME 9/</b>													
LESS THAN 50% OF MSA/MD MEDIAN	1	9	1				3			1	4	5.68	5.74
50-79% OF MSA/MD MEDIAN		12		1			2	1		2	6	5.98	6.02
80-99% OF MSA/MD MEDIAN		9			1		2				6	6.93	8.14
100-119% OF MSA/MD MEDIAN		5	1					1			3	6.24	6.45
120% OR MORE OF MSA/MD MEDIAN		18	1	2	4	6	2		1	2	3.72	3.09	
INCOME NOT AVAILABLE 6/													
<b>GENDER 19/</b>													
MALE	1	27	2	1	2	8	1		3	10	5.34	4.79	
FEMALE		10				2				8	7.27	7.68	
JOINT (MALE/FEMALE)		15	1	1	3	3	3		1	3	4.27	3.91	
GENDER NOT AVAILABLE 6/		1		1							2.32	2.32	
<b>CENSUS TRACT CHARACTERISTICS 10/</b>													
<b>RACIAL/ETHNIC COMPOSITION 11/</b>													
LESS THAN 10% MINORITY		31	3	2	4	11	3		4	4	3.87	3.24	
10-19% MINORITY	1	7		1		1	1			4	6.69	6.32	
20-49% MINORITY		14			1	1				12	7.66	8.30	
50-79% MINORITY		1								1	9.25	9.25	
80-100% MINORITY													
<b>INCOME CHARACTERISTICS 12/ 13/</b>													
LOW INCOME													
MODERATE INCOME		2				1				1	6.39	6.39	
MIDDLE INCOME	1	34	2	3	5	12	2		4	6	4.22	3.25	
UPPER INCOME		17	1					2		14	7.48	8.14	

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BORROWER OR CENSUS TRACT CHARACTERISTICS	15/ NO REPORTED PRICING DATA \$000's	REPORTED PRICING DATA \$000's	PERCENTAGE POINTS ABOVE AVERAGE PRIME OFFER RATE: ONLY INCLUDES LOANS WITH APR ABOVE THE THRESHOLD 16/									
			1.50 - 1.99 \$000's	2.00 - 2.49 \$000's	2.50 - 2.99 \$000's	3.00 - 3.99 \$000's	4.00 - 4.99 \$000's	5.00 - 5.99 \$000's	6 OR MORE \$000's	MEAN 30/	MEDIAN 31/	
<b>BORROWER CHARACTERISTICS</b>												
<b>RACE 5/</b>												
AMERICAN INDIAN/ALASKA NATIVE		79				79					3.03	3.03
ASIAN												
BLACK OR AFRICAN AMERICAN		213								213	9.43	9.35
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND												
WHITE	58	2140	234	137	323	715	170	171	390		4.15	3.25
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)		58							58		7.02	7.02
RACE NOT AVAILABLE 6/		177		57				120			3.61	4.23
<b>ETHNICITY 7/</b>												
HISPANIC OR LATINO		23								23	8.59	8.59
NOT HISPANIC OR LATINO	58	2301	234	137	323	794	218	171	424		4.17	3.25
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)		58							58		7.02	7.02
ETHNICITY NOT AVAILABLE 6/		285		57				72	156		6.88	7.31
<b>MINORITY STATUS 8/</b>												
WHITE NON-HISPANIC	58	1960	234	137	323	715	98	171	282		3.90	3.21
OTHERS, INCLUDING HISPANIC		373					79		294		7.65	8.04
<b>INCOME 9/</b>												
LESS THAN 50% OF MSA/MD MEDIAN	58	258	42				132		10	74	4.72	3.24
50-79% OF MSA/MD MEDIAN		612		77			154	35	116	230	5.37	5.06
80-99% OF MSA/MD MEDIAN		299			65		78			156	6.14	7.98
100-119% OF MSA/MD MEDIAN		266	78					63		125	5.97	4.84
120% OR MORE OF MSA/MD MEDIAN		1232	114	117	258	430	192	45	76		3.45	3.03
INCOME NOT AVAILABLE 6/												
<b>GENDER 19/</b>												
MALE	58	1308	120	77	160	602	35	116	198		4.09	3.24
FEMALE		416				56			360		7.83	8.04
JOINT (MALE/FEMALE)		886	114	60	163	136	255	55	103		3.88	3.91
GENDER NOT AVAILABLE 6/		57		57							2.32	2.32
<b>CENSUS TRACT CHARACTERISTICS 10/</b>												
<b>RACIAL/ETHNIC COMPOSITION 11/</b>												
LESS THAN 10% MINORITY		1929	234	134	258	723	227	171	182		3.62	3.21
10-19% MINORITY	58	282		60		28	63		131		6.55	4.84
20-49% MINORITY		407			65	43			299		7.11	8.14
50-79% MINORITY		49							49		9.25	9.25
80-100% MINORITY												
<b>INCOME CHARACTERISTICS 12/ 13/</b>												
LOW INCOME												
MODERATE INCOME		92				43			49		6.57	9.25
MIDDLE INCOME	58	2051	156	194	323	751	183	171	273		3.94	3.21
UPPER INCOME		524	78				107		339		6.66	8.04

MSA/MD: 17300 - CLARKSVILLE, TN-KY

LOAN TYPE	HOME PURCHASE		REFINANCE		HOME IMPROVEMENT		
	FIRST LIEN	JUNIOR LIEN	FIRST LIEN	JUNIOR LIEN	FIRST LIEN	JUNIOR LIEN	NO LIEN
TOTAL APPLICATIONS 28/							
CONVENTIONAL	1074	25	3550	98	208	158	187
FHA	847	2	1273		24	58	18
VA	2212		1762	1	9		
FSA/RHS	76		2				
LOANS ORIGINATED							
CONVENTIONAL	801	11	2031	53	118	55	108
FHA	609	2	418		9	11	4
VA	1833		974	1	4		
FSA/RHS	47		2				
APPLICATIONS APPROVED BUT NOT ACCEPTED							
CONVENTIONAL	26	3	147	7	12	10	4
FHA	20		57			1	1
VA	44		102				
FSA/RHS							
APPLICATIONS DENIED							
CONVENTIONAL	140	6	844	33	67	79	71
FHA	117		407		8	34	8
VA	176		329		1		
FSA/RHS	20						
APPLICATIONS WITHDRAWN							
CONVENTIONAL	95	3	405	4	9	12	4
FHA	87		332		6	12	5
VA	149		258		4		
FSA/RHS	8						
FILES CLOSED FOR INCOMPLETENESS							
CONVENTIONAL	12	2	123	1	2	2	
FHA	14		59		1		
VA	10		99				
FSA/RHS	1						

MSA/MD: 17300 - CLARKSVILLE, TN-KY

LOAN TYPE	HOME PURCHASE		REFINANCE		HOME IMPROVEMENT		
	FIRST LIEN	JUNIOR LIEN	FIRST LIEN	JUNIOR LIEN	FIRST LIEN	JUNIOR LIEN	NO LIEN
MEMO ITEM: SUBSET OF LOANS ORIGINATED							
PREAPPROVALS RESULTING IN ORIGINATIONS							
CONVENTIONAL	29		NA	NA	NA	NA	NA
FHA	11		NA	NA	NA	NA	NA
VA	39		NA	NA	NA	NA	NA
FSA/RHS			NA	NA	NA	NA	NA
LOANS SOLD							
CONVENTIONAL	387	2	1189		9		
FHA	569	2	389		9		
VA	1706		831	1	4		
FSA/RHS	46		2				

MSA/MD: 17300 - CLARKSVILLE, TN-KY

LOAN TYPE	HOME PURCHASE		REFINANCE		HOME IMPROVEMENT		
	FIRST LIEN	JUNIOR LIEN	FIRST LIEN	JUNIOR LIEN	FIRST LIEN	JUNIOR LIEN	NO LIEN
TOTAL APPLICATIONS 28/							
CONVENTIONAL	163		55	3	10	1	4
FHA	20		15		1		
VA	10		8		1		
FSA/RHS	1						
LOANS ORIGINATED							
CONVENTIONAL	65		33	3	5	1	1
FHA	3		4				
VA	7		1		1		
FSA/RHS	1						
APPLICATIONS APPROVED BUT NOT ACCEPTED							
CONVENTIONAL	39		1		1		
FHA	2		1				
VA			2				
FSA/RHS							
APPLICATIONS DENIED							
CONVENTIONAL	53		15		4		3
FHA	15		6		1		
VA	2		4				
FSA/RHS							
APPLICATIONS WITHDRAWN							
CONVENTIONAL	5		5				
FHA			2				
VA	1						
FSA/RHS							
FILES CLOSED FOR INCOMPLETENESS							
CONVENTIONAL	1		1				
FHA			2				
VA			1				
FSA/RHS							

MSA/MD: 17300 - CLARKSVILLE, TN-KY

LOAN TYPE	HOME PURCHASE		REFINANCE		HOME IMPROVEMENT		
	FIRST LIEN	JUNIOR LIEN	FIRST LIEN	JUNIOR LIEN	FIRST LIEN	JUNIOR LIEN	NO LIEN
MEMO ITEM: SUBSET OF LOANS ORIGINATED							
PREAPPROVALS RESULTING IN ORIGINATIONS							
CONVENTIONAL	2		NA	NA	NA	NA	NA
FHA			NA	NA	NA	NA	NA
VA	1		NA	NA	NA	NA	NA
FSA/RHS			NA	NA	NA	NA	NA
LOANS SOLD							
CONVENTIONAL	3		6				
FHA	3		3				
VA	4		1		1		
FSA/RHS	1						

MSA/MD: 17300 - CLARKSVILLE, TN-KY

LOAN TYPE	HOME PURCHASE		REFINANCE		HOME IMPROVEMENT		
	FIRST LIEN	JUNIOR LIEN	FIRST LIEN	JUNIOR LIEN	FIRST LIEN	JUNIOR LIEN	NO LIEN
TOTAL APPLICATIONS 28/							
CONVENTIONAL	28		9	1			
FHA							
VA							
FSA/RHS							
LOANS ORIGINATED							
CONVENTIONAL	24		8	1			
FHA							
VA							
FSA/RHS							
APPLICATIONS APPROVED BUT NOT ACCEPTED							
CONVENTIONAL							
FHA							
VA							
FSA/RHS							
APPLICATIONS DENIED							
CONVENTIONAL							
FHA							
VA							
FSA/RHS							
APPLICATIONS WITHDRAWN							
CONVENTIONAL	4		1				
FHA							
VA							
FSA/RHS							
FILES CLOSED FOR INCOMPLETENESS							
CONVENTIONAL							
FHA							
VA							
FSA/RHS							
MEMO ITEM: SUBSET OF LOANS ORIGINATED							
LOANS SOLD							
CONVENTIONAL							
FHA							
VA							
FSA/RHS							

MSA/MD: 17300 - CLARKSVILLE, TN-KY

BORROWER OR CENSUS TRACT CHARACTERISTICS	PREAPPROVALS RESULTING IN ORIGINATIONS		PREAPPROVALS APPROVED BUT NOT ACCEPTED 29/		PREAPPROVALS DENIED	
	#	\$000's	#	\$000's	#	\$000's
<b>BORROWER CHARACTERISTICS</b>						
<b>RACE 5/</b>						
AMERICAN INDIAN/ALASKA NATIVE			NA	NA	NA	NA
ASIAN	1	272	NA	NA	NA	NA
BLACK OR AFRICAN AMERICAN			NA	NA	NA	NA
NATIVE HAWAIIAN/OTHER PACIFIC ISLND			NA	NA	NA	NA
WHITE	24	3436	NA	NA	NA	NA
2 OR MORE MINORITY RACES			NA	NA	NA	NA
JOINT (WHITE/MINORITY RACE)			NA	NA	NA	NA
RACE NOT AVAILABLE 6/	4	406	NA	NA	NA	NA
<b>ETHNICITY 7/</b>						
HISPANIC OR LATINO	1	59	NA	NA	NA	NA
NOT HISPANIC OR LATINO	24	3649	NA	NA	NA	NA
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)			NA	NA	NA	NA
ETHNICITY NOT AVAILABLE 6/	4	406	NA	NA	NA	NA
<b>MINORITY STATUS 8/</b>						
WHITE NON-HISPANIC	23	3377	NA	NA	NA	NA
OTHERS, INCLUDING HISPANIC	2	331	NA	NA	NA	NA
<b>INCOME 9/</b>						
LESS THAN 50% OF MSA/MD MEDIAN			NA	NA	NA	NA
50-79% OF MSA/MD MEDIAN	4	303	NA	NA	NA	NA
80-99% OF MSA/MD MEDIAN	7	935	NA	NA	NA	NA
100-119% OF MSA/MD MEDIAN	1	200	NA	NA	NA	NA
120% OR MORE OF MSA/MD MEDIAN	16	2558	NA	NA	NA	NA
INCOME NOT AVAILABLE 6/	1	118	NA	NA	NA	NA
<b>GENDER 19/</b>						
MALE	8	1223	NA	NA	NA	NA
FEMALE	5	491	NA	NA	NA	NA
JOINT (MALE/FEMALE)	12	1962	NA	NA	NA	NA
GENDER NOT AVAILABLE 6/	4	438	NA	NA	NA	NA
<b>CENSUS TRACT CHARACTERISTICS 10/</b>						
<b>RACIAL/ETHNIC COMPOSITION 11/</b>						
LESS THAN 10% MINORITY	10	1586	NA	NA	NA	NA
10-19% MINORITY	9	1150	NA	NA	NA	NA
20-49% MINORITY	10	1378	NA	NA	NA	NA
50-79% MINORITY			NA	NA	NA	NA
80-100% MINORITY			NA	NA	NA	NA
<b>INCOME CHARACTERISTICS 12/ 13/</b>						
LOW INCOME			NA	NA	NA	NA
MODERATE INCOME			NA	NA	NA	NA
MIDDLE INCOME	13	1484	NA	NA	NA	NA
UPPER INCOME	16	2630	NA	NA	NA	NA

MSA/MD: 17300 - CLARKSVILLE, TN-KY

PRICING INFORMATION	HOME PURCHASE		REFINANCE		HOME IMPROVEMENT		
	FIRST LIEN	JUNIOR LIEN	FIRST LIEN	JUNIOR LIEN	FIRST LIEN	JUNIOR LIEN	NO LIEN
1- TO 4-FAMILY OWNER OCCUPIED DWELLINGS (EXCLUDES MANUFACTURED HOMES)							
INCIDENCE OF PRICING							
NO PRICING REPORTED 15/ PRICING REPORTED	467 49	9	1554 107	33 10	63 21	39 9	NA NA
MEAN (POINTS ABOVE AVERAGE PRIME OFFER RATE: ONLY INCLUDES LOANS WITH APR ABOVE THE THRESHOLD 16/)	2.67		2.89	5.00	3.53	5.10	NA
MEDIAN (POINTS ABOVE AVERAGE PRIME OFFER RATE: ONLY INCLUDES LOANS WITH APR ABOVE THE THRESHOLD 16/)	2.67		2.39	4.74	3.05	4.50	NA
HOEPA STATUS							
HOEPA LOAN 17/ NOT HOEPA LOAN	NA NA	NA NA	1661	1 42	84	48	NA NA
MANUFACTURED HOME OWNER OCCUPIED DWELLINGS							
INCIDENCE OF PRICING							
NO PRICING REPORTED 15/ PRICING REPORTED	1 53		17 8	3	5	1	NA NA
MEAN (POINTS ABOVE AVERAGE PRIME OFFER RATE: ONLY INCLUDES LOANS WITH APR ABOVE THE THRESHOLD 16/)	5.35		4.24		3.27	7.59	NA
MEDIAN (POINTS ABOVE AVERAGE PRIME OFFER RATE: ONLY INCLUDES LOANS WITH APR ABOVE THE THRESHOLD 16/)	4.79		4.35		3.39	7.59	NA
HOEPA STATUS							
HOEPA LOAN 17/ NOT HOEPA LOAN	NA NA	NA NA	24	1 3	5	1	NA NA

## **APPENDIX B**

# **RESIDENT SURVEY AND ANALYSIS OF RESULTS**

# 1. INTRODUCTION

The Clarksville Office of Housing and Community Development is in the process of preparing the City's Fair Housing Plan. This document is the City's plan to provide services and conduct activities in a non-discriminatory manner and to affirmatively further fair housing in the City, meeting the US Department of Housing and Urban Development (HUD) requirements for the receipt and use of federal funds, in particular for the Community Development Block Grant (CDBG) and HOME Investment Partnerships programs.

This Plan affects neighborhoods and organizations across the City, and input from residents, city agencies, and service organizations is vital to identifying key issues and concerns and to understanding what actions the City should take to enforce these Federal laws and regulations. For this reason, we are asking individuals to complete this brief online survey as part of the planning process. You may respond from your home computer, or use a computer at the public library, a church, or a civic center. This will help us gather as much input as possible so that we can prepare a complete and accurate Plan that reflects our City's needs and responses.

Please check [www.cityofclarksville.com](http://www.cityofclarksville.com) for updates and information.

If you have any questions, concerns, or comments about the survey, please contact Ms Lisa Walker, Office of Housing and Community Development at 931/648-6133 or [lisa.walker@cityofclarksville.com](mailto:lisa.walker@cityofclarksville.com).

Please note that your responses to all questions will remain anonymous.

Thank you for your assistance. We look forward to receiving your response.

## 2. FAIR HOUSING QUESTIONS - OVERVIEW

Please answer the following questions based upon your knowledge and experience.

### 1. Have you personally experienced housing discrimination in Clarksville?

- Yes - If Yes, please go to question 2
- No - If No, please go to question 4

### 2. Did you report this discrimination?

- Yes -- If Yes, please go to Question 3
- No -- If No, please go to question 4

### 3. Why did you not report this discrimination? Choose all appropriate answers.

- Did not know where to report it
- Afraid of retaliation
- Did not think it would make a difference
- Not sure of my rights

### 4. Are there areas in Clarksville that you believe have fair housing problems?

- Yes
- No
- Do Not Know

If Yes, please identify them by neighborhood name

### 5. If residents in your community experienced housing discrimination, do you think they would know where or how to report it?

- Yes
- No
- Don't know

### 6. In the past two years, housing discrimination in your community

- Has become less of a concern
- Has become more of a concern
- Is not a concern
- No opinion

### 3. CITIZEN UNDERSTANDING OF FAIR HOUSING RIGHTS

This section seeks information about your understanding of fair housing rights. Please complete each question based upon your knowledge or experience

#### 7. Please check the appropriate rating for each topic below.

How well do you feel that each of the following understand fair housing rights --

	Well	Moderately Well	Poorly	No Opinion
Buyers and Sellers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Real Estate Professionals	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Housing Lenders	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Apartment Managers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

#### 8. Does your community have a zoning ordinance?

- Yes
- No
- Don't know

#### 9. Are there regulations, ordinances, or policies that represent barriers to fair housing?

- Yes
- No
- Don't know

If Yes, please identify or describe them

#### 10. Is there sufficient fair housing outreach and education in your community?

- Yes
- No
- No Opinion

#### 11. If you responded NO to the preceding question, what forms of outreach or education do you think are needed? Check as many as are appropriate.

- Housing Fairs and Events
- News articles/media attention
- Brochures
- Newspaper ads
- Public service announcements

Other (please specify)

**12. Do YOU feel well informed about fair housing laws and regulations?**

Yes

No

## 4. DEMOGRAPHIC INFORMATION

This section of the survey seeks demographic information from you . This information is optional but it will help the City have a more accurate picture of survey respondents and will enable the City to better develop programs that address fair housing.

### 13. Please indicate in which Ward you reside.

- Ward One
- Ward Two
- Ward Three
- Ward Four
- Ward Five
- Ward Six
- Ward Seven
- Ward Eight
- Ward Nine
- Ward Ten
- Ward Eleven
- Ward Twelve

### 14. Please choose the appropriate response for Race

- African American
- White
- Asian
- Pacific Islander
- Native American Other Race
- Two or More Races
- Prefer not to answer

### 15. Please choose the appropriate ethnicity

- Hispanic
- Non-Hispanic

## 16. Annual Household Income

- Less than \$15,000
- \$15,000 to \$35,000
- \$35,000 to \$50,000
- \$50,000 to \$75,000
- \$75,000 to \$100,000
- \$100,000 to \$150,000
- Greater than \$150,000
- Prefer not to answer

## 17. Do you

- Own your home
- Rent your home

## 18. If you rent, is your home

- An Apartment
- A House

## 1. Have you personally experienced housing discrimination in Clarksville?

		Response Percent	Response Count
Yes - If Yes, please go to question 2		9.1%	5
No - If No, please go to question 4		90.9%	50
		answered question	55
		skipped question	2

## 2. Did you report this discrimination?

		Response Percent	Response Count
Yes -- If Yes, please go to Question 3		11.1%	1
No -- If No, please go to question 4		88.9%	8
		answered question	9
		skipped question	48

### 3. Why did you not report this discrimination? Choose all appropriate answers.

		Response Percent	Response Count
Did not know where to report it		20.0%	1
Afraid of retaliation		0.0%	0
Did not think it would make a difference		20.0%	1
<b>Not sure of my rights</b>		<b>60.0%</b>	<b>3</b>
		<b>answered question</b>	<b>5</b>
		<b>skipped question</b>	<b>52</b>

### 4. Are there areas in Clarksville that you believe have fair housing problems?

		Response Percent	Response Count
Yes		33.9%	19
No		30.4%	17
<b>Do Not Know</b>		<b>35.7%</b>	<b>20</b>
		If Yes, please identify them by neighborhood name	13
		<b>answered question</b>	<b>56</b>
		<b>skipped question</b>	<b>1</b>

**5. If residents in your community experienced housing discrimination, do you think they would know where or how to report it?**

		Response Percent	Response Count
Yes		21.4%	12
No		55.4%	31
Don't know		23.2%	13
<b>answered question</b>			<b>56</b>
<b>skipped question</b>			<b>1</b>

**6. In the past two years, housing discrimination in your community**

		Response Percent	Response Count
Has become less of a concern		20.0%	11
Has become more of a concern		20.0%	11
Is not a concern		23.6%	13
<b>No opinion</b>		<b>36.4%</b>	<b>20</b>
<b>answered question</b>			<b>55</b>
<b>skipped question</b>			<b>2</b>

**7. Please check the appropriate rating for each topic below. How well do you feel that each of the following understand fair housing rights --**

	Well	Moderately Well	Poorly	No Opinion	Response Count
Buyers and Sellers	11.1% (6)	<b>50.0% (27)</b>	35.2% (19)	3.7% (2)	54
Real Estate Professionals	37.7% (20)	<b>50.9% (27)</b>	7.5% (4)	3.8% (2)	53
Housing Lenders	39.6% (21)	<b>50.9% (27)</b>	7.5% (4)	1.9% (1)	53
Apartment Managers	20.8% (11)	<b>47.2% (25)</b>	26.4% (14)	5.7% (3)	53
<b>answered question</b>					<b>55</b>
<b>skipped question</b>					<b>2</b>

**8. Does your community have a zoning ordinance?**

		Response Percent	Response Count
Yes		<b>78.2%</b>	<b>43</b>
No		3.6%	2
Don't know		18.2%	10
<b>answered question</b>			<b>55</b>
<b>skipped question</b>			<b>2</b>

### 9. Are there regulations, ordinances, or policies that represent barriers to fair housing?

		Response Percent	Response Count
Yes		14.5%	8
No		34.5%	19
Don't know		50.9%	28

If Yes, please identify or describe them 4

answered question 55

skipped question 2

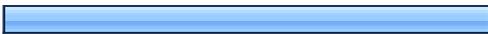
### 10. Is there sufficient fair housing outreach and education in your community?

		Response Percent	Response Count
Yes		21.8%	12
No		49.1%	27
No Opinion		29.1%	16

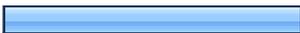
answered question 55

skipped question 2

**11. If you responded NO to the preceding question, what forms of outreach or education do you think are needed? Check as many as are appropriate.**

		Response Percent	Response Count
Housing Fairs and Events		70.0%	21
News articles/media attention		73.3%	22
Brochures		73.3%	22
Newspaper ads		53.3%	16
Public service announcements		53.3%	16
	Other (please specify)		5
<b>answered question</b>			<b>30</b>
<b>skipped question</b>			<b>27</b>

**12. Do YOU feel well informed about fair housing laws and regulations?**

		Response Percent	Response Count
Yes		55.4%	31
No		44.6%	25
<b>answered question</b>			<b>56</b>
<b>skipped question</b>			<b>1</b>

### 13. Please indicate in which Ward you reside.

		Response Percent	Response Count
Ward One		9.7%	3
Ward Two		9.7%	3
Ward Three		3.2%	1
Ward Four		3.2%	1
Ward Five		0.0%	0
Ward Six		16.1%	5
Ward Seven		6.5%	2
Ward Eight		3.2%	1
Ward Nine		12.9%	4
Ward Ten		0.0%	0
<b>Ward Eleven</b>		<b>22.6%</b>	<b>7</b>
Ward Twelve		12.9%	4
<b>answered question</b>			<b>31</b>
<b>skipped question</b>			<b>26</b>

### 14. Please choose the appropriate response for Race

		Response Percent	Response Count
African American		20.4%	11
<b>White</b>		<b>70.4%</b>	<b>38</b>
Asian		1.9%	1
Pacific Islander		0.0%	0
Native American Other Race		0.0%	0
Two or More Races		1.9%	1
Prefer not to answer		5.6%	3
<b>answered question</b>			<b>54</b>
<b>skipped question</b>			<b>3</b>

### 15. Please choose the appropriate ethnicity

		Response Percent	Response Count
Hispanic		4.0%	2
<b>Non-Hispanic</b>		<b>96.0%</b>	<b>48</b>
<b>answered question</b>			<b>50</b>
<b>skipped question</b>			<b>7</b>

## 16. Annual Household Income

		Response Percent	Response Count
Less than \$15,000		9.4%	5
\$15,000 to \$35,000		13.2%	7
<b>\$35,000 to \$50,000</b>		<b>18.9%</b>	<b>10</b>
\$50,000 to \$75,000		17.0%	9
\$75,000 to \$100,000		13.2%	7
<b>\$100,000 to \$150,000</b>		<b>18.9%</b>	<b>10</b>
Greater than \$150,000		5.7%	3
Prefer not to answer		3.8%	2
<b>answered question</b>			<b>53</b>
<b>skipped question</b>			<b>4</b>

## 17. Do you

		Response Percent	Response Count
<b>Own your home</b>		<b>71.7%</b>	<b>38</b>
Rent your home		28.3%	15
<b>answered question</b>			<b>53</b>
<b>skipped question</b>			<b>4</b>

## 18. If you rent, is your home

		Response Percent	Response Count
An Apartment		33.3%	6
A House		66.7%	12
answered question			18
skipped question			39

## **APPENDIX C**

### **NOTICE OF PUBLIC HEARING**

00007715047

**Affidavit of Publication**

**NEWSPAPER:**

**THE LEAF CHRONICLE**

State of Tennessee

ADVERTISER: City of Clarksville Housing

TEAR SHEETS  
ATTACHED

RE: Notice of Public Meeting

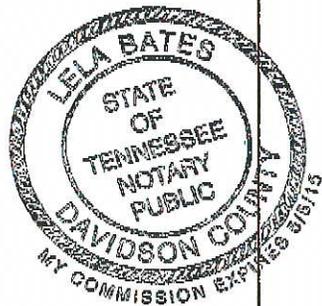
I, W. Ellison Advertising Assistant for the above mentioned newspaper, hereby certify that the attached advertisement appeared in said newspaper on the following dates:

Wednesday, January 25, 2012

W. Ellison

Subscribed and sworn to me this 27 day of January, 2012

Lela Bates  
NOTARY PUBLIC



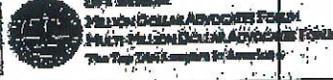
**LOTTERIES  
TENNESSEE**

**WTB**

them (besides the fact that they seem to work in controlling pain) was that

MRAP Ambusc cle, tol howevr presidi those v ed frt passed Bush."

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**Notice of Public Meeting**

The public is invited to a public meeting to provide comments on the City's 2011 Analysis of Impediments to Fair Housing Choice (AI). The AI is a requirement of the US Department of Housing and Urban Development to obtain federal entitlement funding. The document serves as an action plan and guide to assist in the elimination of impediments to fair housing choice and to support the provision of fair and equal access to housing for residents without regard to race, color, sex, religion, national origin, handicap, or familial status.

Your opportunity to provide public comment on the Analysis of Impediments to Fair Housing Choice will be February 02, 2012, at 7:00 p.m. at the City Council Chambers, 106 Public Square. Members of the public are invited to attend this meeting to learn more about this document and to express their comments on this topic at this meeting, or contact the director of the Office of Housing and Community Development.

The City of Clarksville will make reasonable accommodations and services necessary for sensory-impaired and disabled citizens at the public meeting. Additionally, translation services may be offered upon request and availability. Persons requiring such accommodations/services should contact Keith Lampkin, Director, Office of Housing and Community Development at (931) 648-6133 or keith.lampkin@cityofclarksville.com at least three working days in advance of the meeting.

TN-090774047

**RED TAG SALE!**

**OL' EARL'S Boots Plus**

- \$10 off ALL RED TAG Prices on Laredo & Dingo Boots (Men's & Women's only)
- 20% off ALL CLOTHING! INCLUDING WRANGLER JEANS
- 10% off ALL ACCESSORIES!

**HURRY IN...LIMITED QUANTITIES!**



**GOVE**

To a calend chronic

**TODAY**

9 a Meetr Landfil  
10 a

### **Notice of Public Meeting**

The public is invited to a public meeting to provide comments on the City's 2011 Analysis of Impediments to Fair Housing Choice (AI). The AI is a requirement of the US Department of Housing and Urban Development to obtain federal entitlement funding. The document serves as an action plan and guide to assist in the elimination of impediments to fair housing choice and to support the provision of fair and equal access to housing for residents without regard to race, color, sex, religion, national origin, handicap, or familial status.

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TN-000775047

*Wednesday, Jan 25, 2012*

# **APPENDIX D**

## **MAPS**



**Map of Clarksville with Percent of all people who are Minority in 2010.**

**Percent of all people who are Minority in 2010.**

Percent of the population that is Minority in 2010. According to Community Reinvestment Act (CRA) specifications, this number is calculated by subtracting 2000 Not Hispanic or Latino population from the total population. CRA regulations define minority population in terms of: less than 10%; equal or greater than 10% and less than 19%; equal or greater than 20% and less than 49%; equal or greater than 50% and less than 79%; and equal or greater than 80%. Percentage calculations were suppressed in cases where the denominator of the calculation was less than ten. Such areas are represented as having "Insufficient Data" in the map. Census tracts that have split, merged or otherwise significantly changed from 2000 to 2010 are also shown as having "Insufficient Data." For Census block group data, TRF created a bridge table between 2010 and 2000 block geographies in order to accurately display the 2010 data on 2000 block group boundaries.

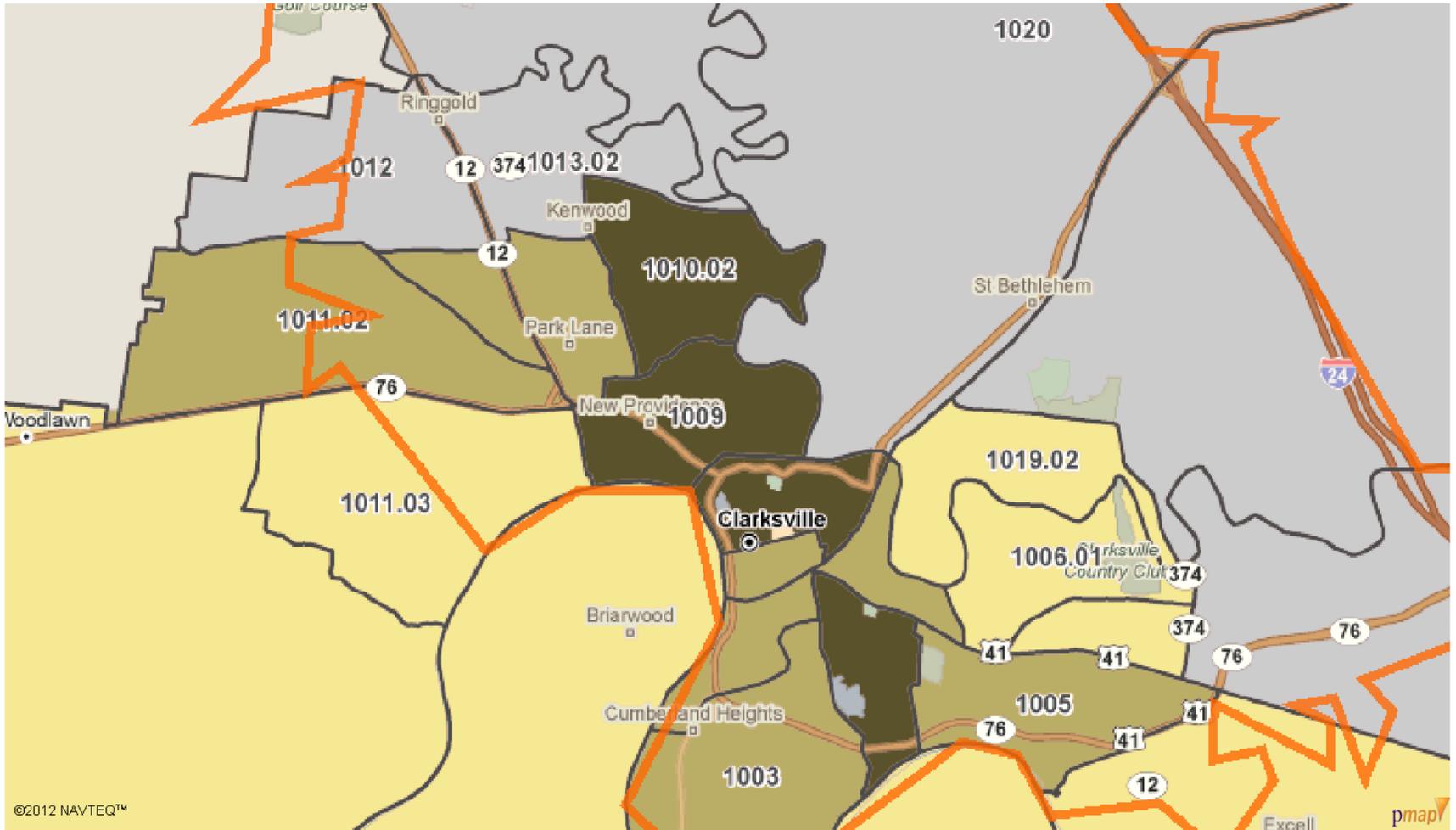
**Legend**

Year  
2010

Variable  
%

- Insufficient Data
- 9.99% or less
- 10.00% - 24.99%
- 25.00% - 49.99%
- 50.00% or more

Shaded by: Census Tract  
Source: Census





**Map of Clarksville with Percent of all people who are African American in 2010.**

**Percent of all people who are African American in 2010.**

Percent of the population that is Black or African American, by single classification of Census race, in 2010. Percentage calculations were suppressed in cases where the denominator of the calculation was less than 10 of the unit that is being described (e.g., households, people, householders, etc). Such areas are represented as having "Insufficient Data" in the map. Denominators for percentage calculations were created by summing all of the component data items in a particular dataset. Census tracts that have split, merged or otherwise significantly changed from 2000 to 2010 are also shown as having "Insufficient Data." For Census block group data, TRF created a bridge table between 2010 and 2000 block geographies in order to accurately display the 2010 data on 2000 block group boundaries.

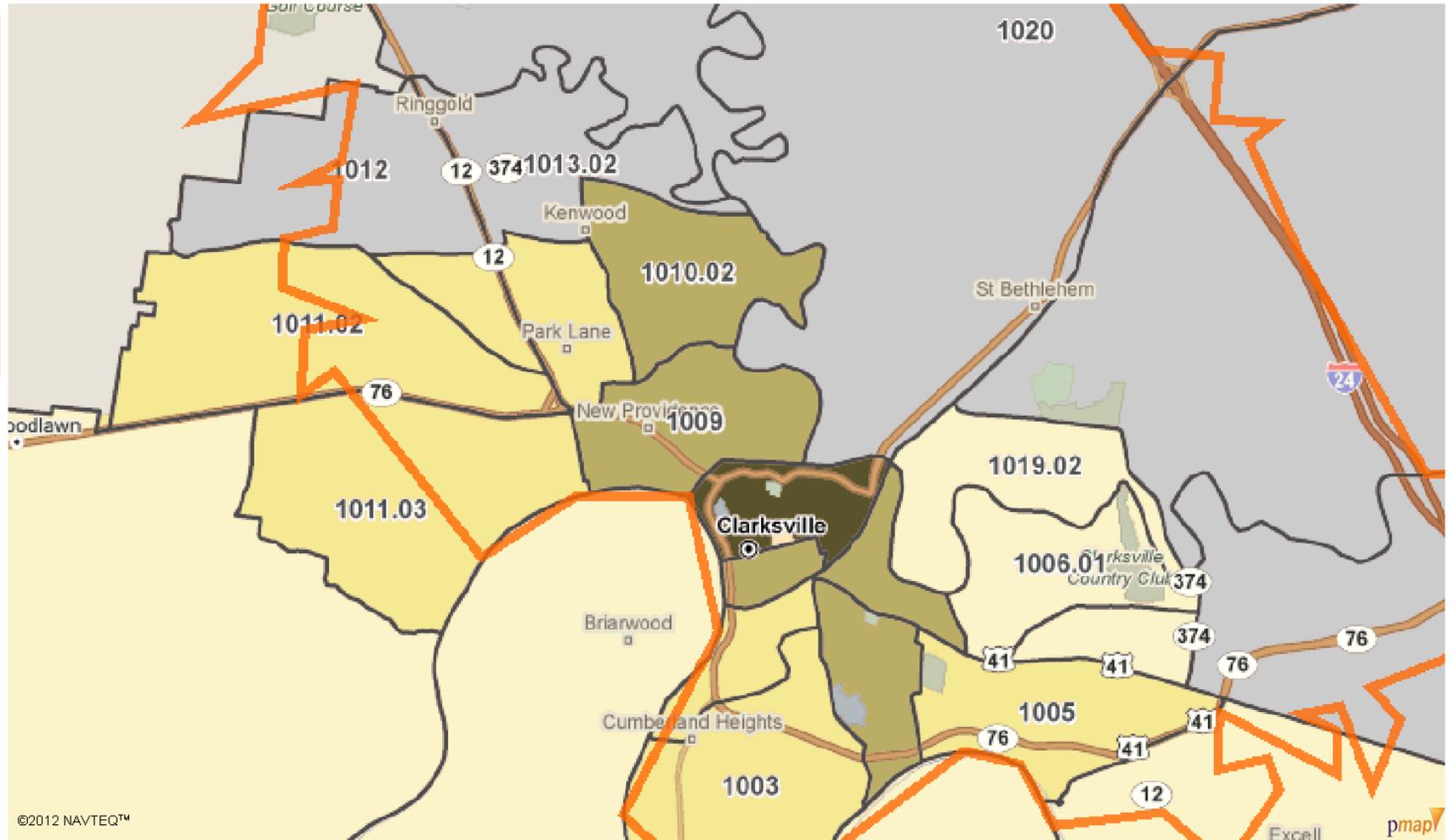
**Legend**

Year  
2010

Variable  
%

- Insufficient Data
- 9.99% or less
- 10.00% - 24.99%
- 25.00% - 49.99%
- 50.00% or more

Shaded by: Census Tract  
Source: Census





### Map of Clarksville with Percent of all people who are Hispanic in 2010.

#### Percent of all people who are Hispanic in 2010.

Percent of the population that is Hispanic or Latino in 2010. Percentage calculations were suppressed in cases where the denominator of the calculation was less than 10 of the unit that is being described (e.g., households, people, householders, etc). Such areas are represented as having "Insufficient Data" in the map. Denominators for percentage calculations were created by summing all of the component data items in a particular dataset. Census tracts that have split, merged or otherwise significantly changed from 2000 to 2010 are also shown as having "Insufficient Data." For Census block group data, TRF created a bridge table between 2010 and 2000 block geographies in order to accurately display the 2010 data on 2000 block group boundaries.

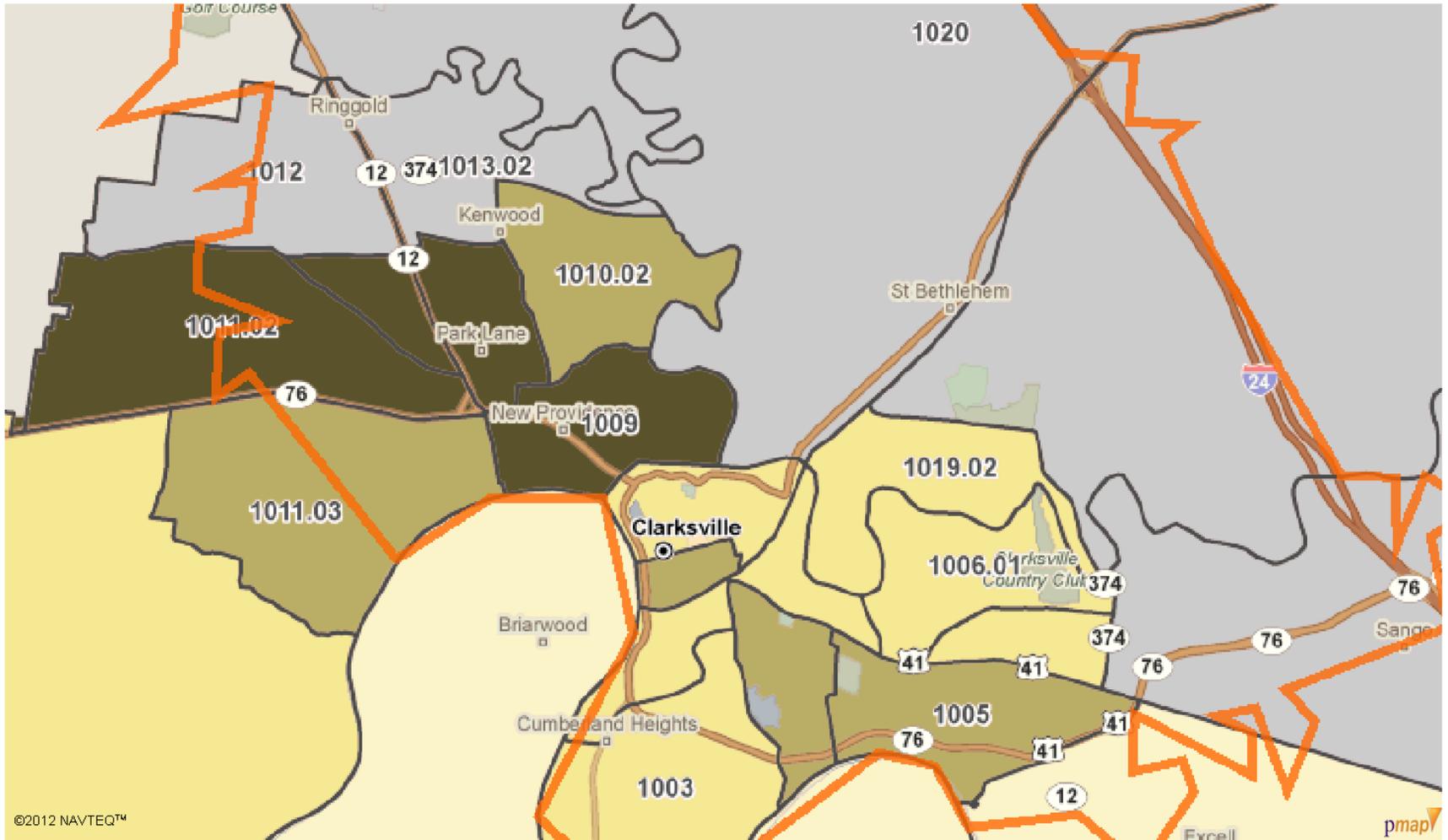
**Legend**

Year  
2010

Variable  
%

- Insufficient Data
- 2.99% or less
- 3.00% - 5.99%
- 6.00% - 9.99%
- 10.00% or more

Shaded by: Census Tract  
Source: Census





Map of Clarksville with Estimated percent of all people that are living in poverty as of 2005-2009.

Estimated percent of all people that are living in poverty as of 2005-2009.

Estimated percent of population living below poverty level between 2005-2009. Percentage calculations were suppressed in cases where the denominator of the calculation was less than 10 of the unit that is being described (eg, households, people, householders, etc). Such areas are represented as having "Insufficient Data" in the map. Denominators for percentage calculations were created by summing all of the component data items in a particular dataset.

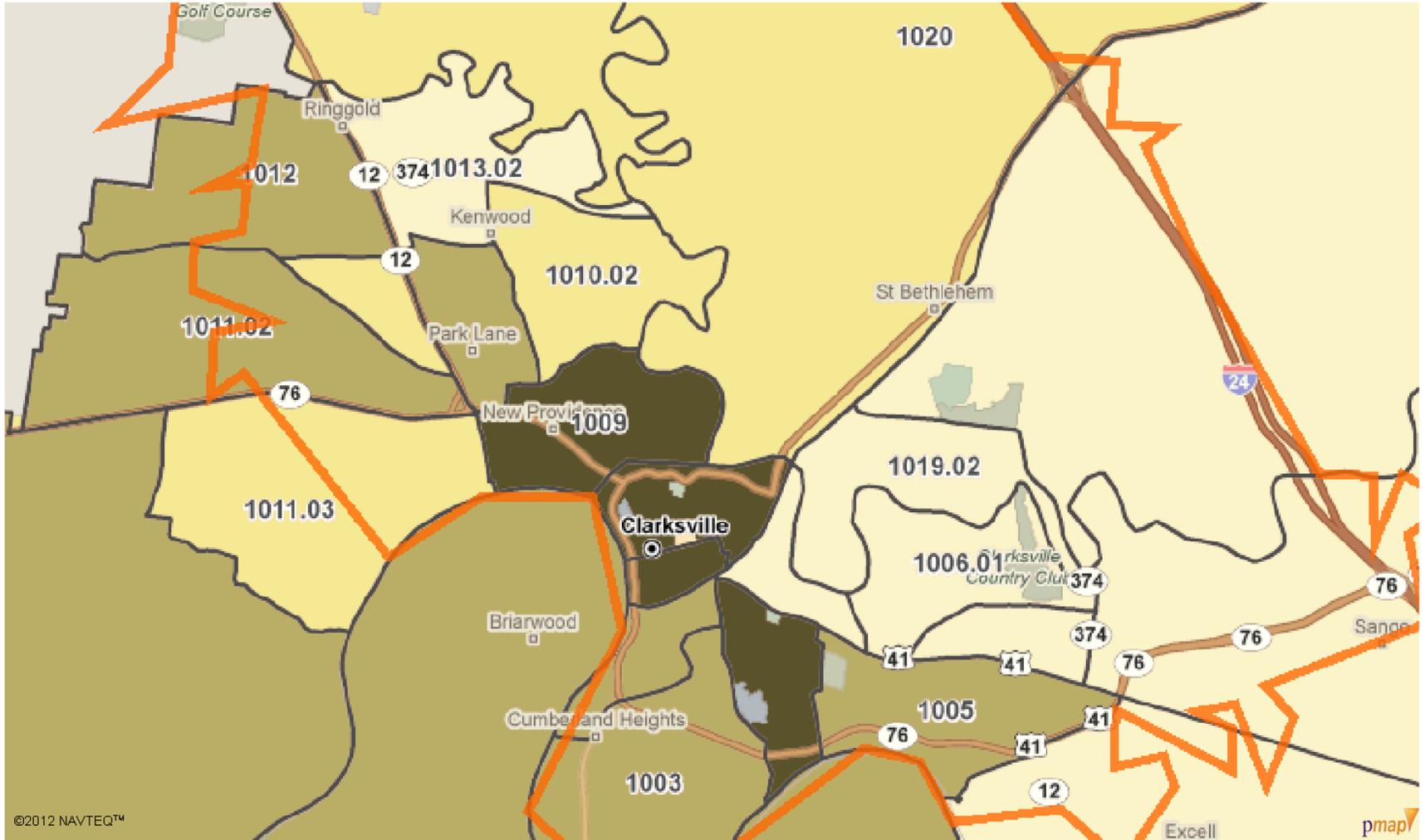
**Legend**

Year  
2009

Variable  
%

- Insufficient Data
- 9.99% or less
- 10.00% - 14.99%
- 15.00% - 24.99%
- 25.00% or more

Shaded by: Census Tract  
Source: Census





## Map of Clarksville with Percent of housing units that are vacant in 2010.

### Percent of housing units that are vacant in 2010.

Percent of housing units that are vacant in 2010. A housing unit is vacant if no one is living in it at the time of enumeration, unless occupants are temporarily absent. Units temporarily occupied at the time of enumeration by people who have a usual residence elsewhere are considered vacant as are new units not yet occupied if construction has reached a point of habitability. Percentage calculations were suppressed in cases where the denominator of the calculation was less than 10 of the unit that is being described (e.g., households, people, householders, etc). Such areas are represented as having "Insufficient Data" in the map. Census tracts that have split, merged or otherwise significantly changed from 2000 to 2010 are also shown as having "Insufficient Data." For Census block group data, TRF created a bridge table between 2010 and 2000 block geographies in order to accurately display the 2010 data on 2000 block group boundaries.

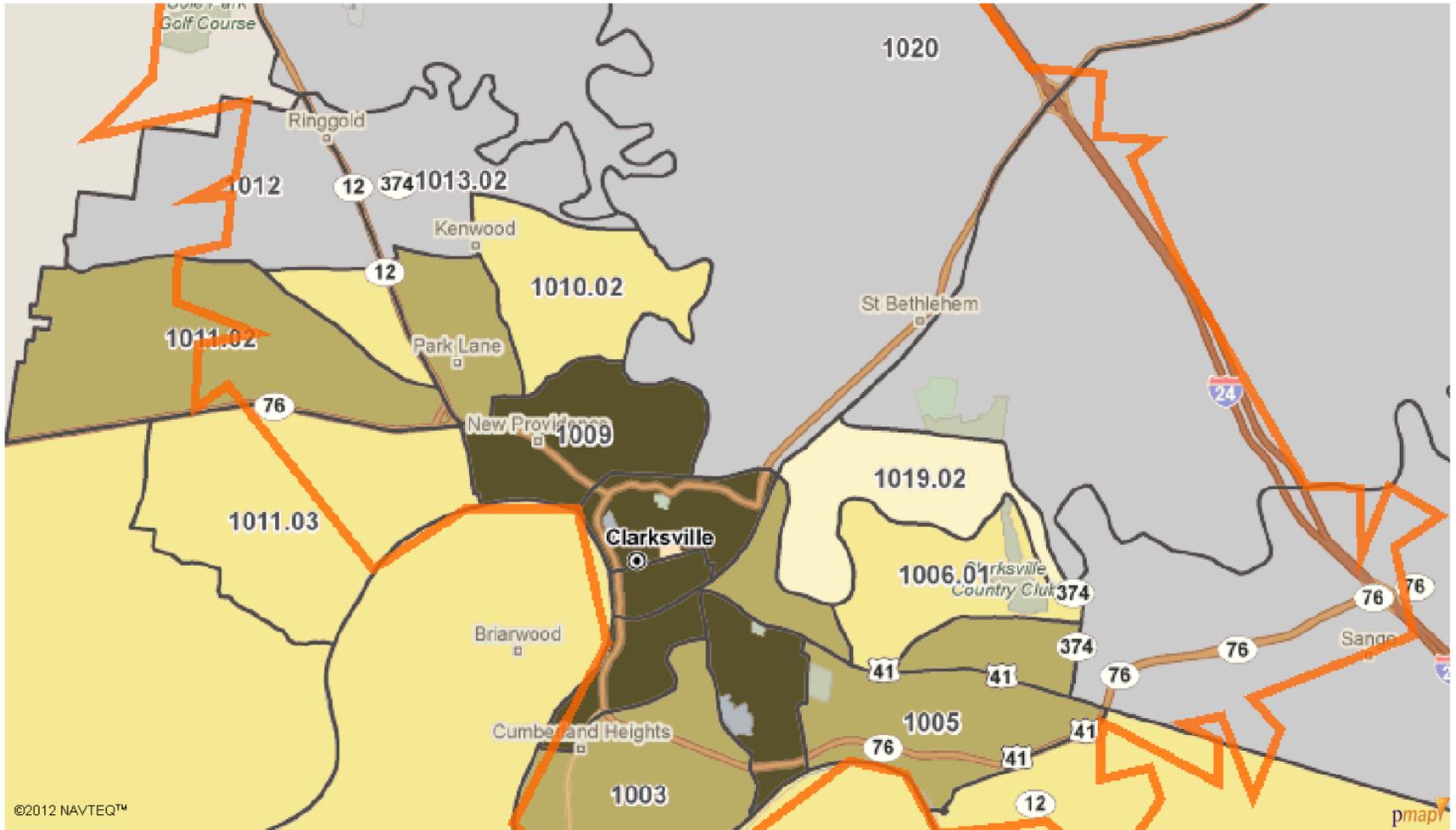
**Legend**

**Year**  
2010

**Variable**  
%

- Insufficient Data
- 5.30% or less
- 5.31% - 8.09%
- 8.10% - 12.66%
- 12.67% or more

Shaded by: Census Tract  
Source: Census





Map of Clarksville with Estimated typical (median) income of a household between 2005-2009.

Estimated typical (median) income of a household between 2005-2009.

Estimated median household income in the past 12 months, as reported between 2005-2009. A household includes all the people who occupy a housing unit as their usual place of residence. Medians were suppressed in cases where the sample of the average was less than 10 of the unit that is being described (eg, households, people, householders, etc). Such areas are represented as having "Insufficient Data" in the map. ACS employs values to indicate top and bottom ranges of income. A value of 250,001 indicates a value of 250,000 or greater, whereas a value of 2,499 indicates a value of 2,500 or less.

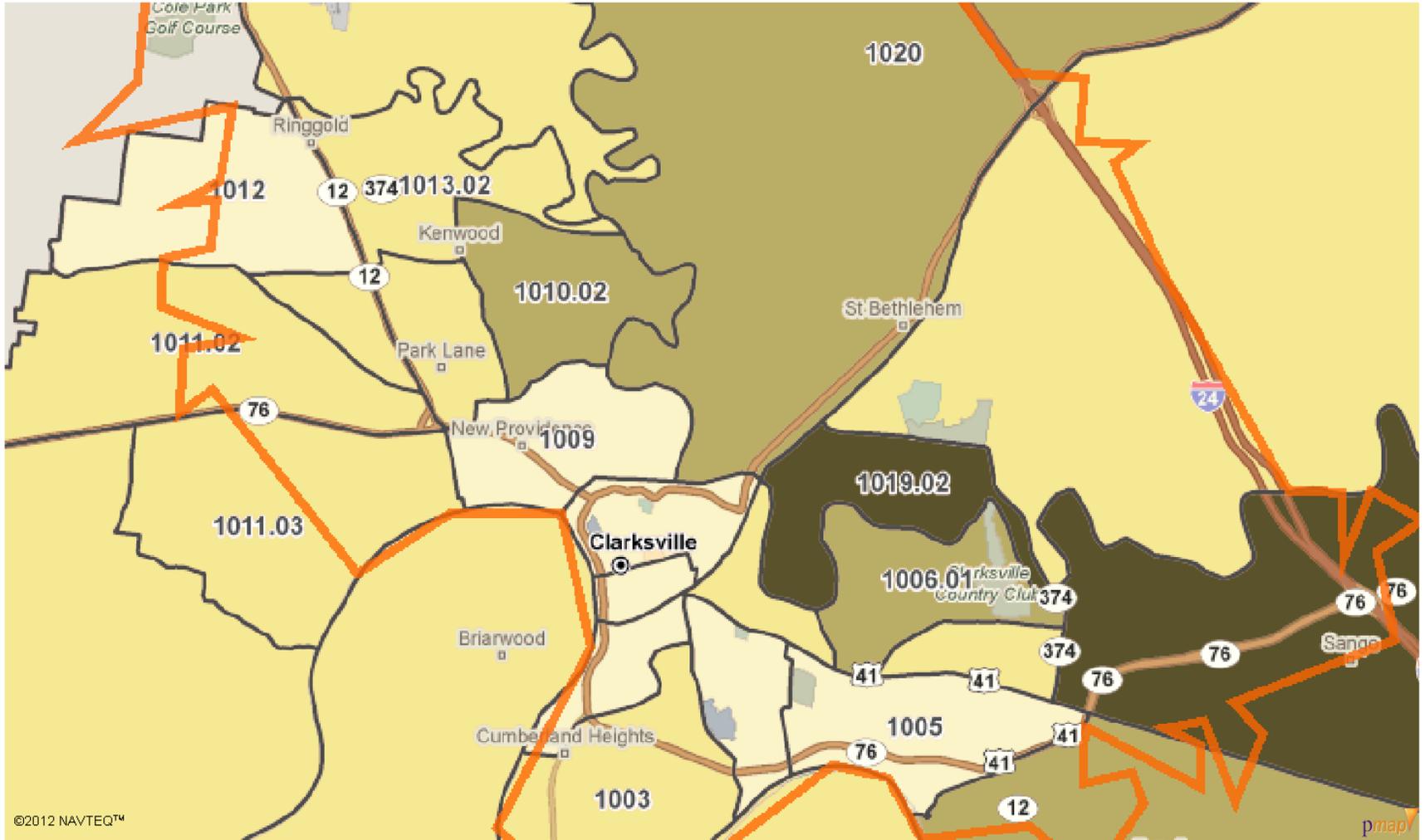
**Legend**

Year  
2009

Variable  
\$

- Insufficient Data
- \$34,999 or less
- \$35,000 - \$53,299
- \$53,300 - \$66,999
- \$67,000 or more

Shaded by: Census Tract  
Source: Census



**APPENDIX E**

**FOCUS GROUP PRESENTATION**

**AND**

**SIGN-IN SHEETS**

**CITY OF CLARKSVILLE, TN**



**ANALYSIS OF IMPEDIMENTS  
TO FAIR HOUSING CHOICE**

**FOCUS GROUP MEETINGS**

**November 2-3, 2011**

**CITY OF CLARKSVILLE, TN**



## **THE FAIR HOUSING PLAN**

**HUD REQUIRES JURISDICTIONS RECEIVING  
HUD FUNDS TO “AFFIRMATIVELY FURTHER  
FAIR HOUSING” - AFFH**

**- EXPAND MOBILITY**

**- BROADEN HOUSING CHOICE**

**REGARDLESS OF RACE, DISABILITY, ETC.**

# CITY OF CLARKSVILLE, TN



**“AFFIRMATIVELY FURTHER FAIR HOUSING”**

**NO LEGAL DEFINITION -- BUT**

**HUD REQUIRES GRANTEES TO**

**1) IDENTIFY IMPEDIMENTS**

**2) ACT TO OVERCOME THEM**

**3) KEEP RECORDS SHOW ACTIONS**

**CITY OF CLARKSVILLE, TN**



**THE CONSOLIDATED PLAN DESCRIBES  
THE NEED FOR FUNDS AND THEIR USE**

**THE CONSOLIDATED ANNUAL  
PERFORMANCE AND EVALUATION  
REPORT (CAPER)**

**NOTES ACTIVITY AND PROGRESS**

**CERTIFIES AFFH**

**CITY OF CLARKSVILLE, TN**



## **ENFORCEMENT**

**IF DEEMED NOT TO BE FURTHERING FAIR  
HOUSING A JURISDICTION CAN LOSE CDBG  
AND HOME FUNDING**

**WESTCHESTER COUNTY SITUATION**

**CITY OF CLARKSVILLE, TN**



## **WHAT IS AN ANALYSIS OF IMPEDIMENTS (AI)?**

**A COMPREHENSIVE REVIEW AND ASSESSMENT OF LAWS, REGULATIONS, PUBLIC AND PRIVATE CONDITIONS, AND AVAILABILITY OF AFFORDABLE, ACCESSIBLE HOUSING THAT IDENTIFIES IMPEDIMENTS TO FAIR HOUSING CHOICE IN THE PUBLIC AND PRIVATE SECTORS**

**CITY OF CLARKSVILLE, TN**



**THE AI CONTAINS**

**BACKGROUND**

**HOUSING MORTGAGE DATA**

**DISCRIMINATION COMPLAINT DATA**

**REVIEW OF ZONING AND LAND USE LAWS**

**PUBLIC INPUT & RECOMMENDATIONS**

# CITY OF CLARKSVILLE, TN



## THE AI PROCESS

↳ RESEARCH

↳ FOCUS GROUPS/PUBLIC MEETING

↳ SURVEY

↳ PUBLIC INPUT

# CITY OF CLARKSVILLE, TN



## THE AI PROCESS-PUBLIC INPUT

- RESEARCH AND COMMUNITY INPUT
- PUBLIC HEARING
- PUBLIC REVIEW AND COMMENT
- GOVERNING BODY APPROVAL

# CITY OF CLARKSVILLE, TN



## THE FAIR HOUSING PLAN

- ▶ DESCRIBES IMPEDIMENTS THROUGH THE AI
- ▶ DESCRIBES OUTREACH AND EDUCATION
- ▶ DESCRIBES ACTIONS TO REMOVE IMPEDIMENTS

# CITY OF CLARKSVILLE, TN



## TENTATIVE TIMELINE

**NOVEMBER 2011**

**RESEARCH AND FOCUS GROUP MEETINGS**

**DECEMBER 2011**

**DOCUMENTS DRAFTED**

**JANUARY 2012**

**PUBLIC REVIEW OF DOCUMENTS**

**JANUARY - FEBRUARY 2012 -- PREPARE FINAL  
DOCUMENTS**

**FEBRUARY 15, 2012**

**DOCUMENTS SUBMITTED TO HUD**

# CITY OF CLARKSVILLE, TN



## NEXT STEPS?

COMPLETE RESEARCH

PREPARE DRAFT

OTHER COMMENTS OR IDEAS AFTER THIS  
MEETING?

**CONTACT: Keith Lampkin – (931)648-6133**  
**KEITH.LAMPKIN@CITYOFCLARKSVILLE.COM**

**CITY OF CLARKSVILLE, TN**



## **OUR PURPOSE TODAY**

**TO DISCUSS FAIR HOUSING ISSUES FROM YOUR  
PERSPECTIVE**

**CITY OF CLARKSVILLE, TN**



**THANK YOU FOR YOUR  
PARTICIPATION**

November 2, 2011

9:00 AM

## Focus Group Meetings

	Name	Phone	E-Mail
1	Wanda Mills	931 647-2303	wmills@clarksvillehousing.org
2	Jill Hall	931-645-7448	jhall@cityofclarksville.com
3	Bill Summers	931-358-3579	Ward 10 @cityofclarksville.com
4	JOHN SPAINHOWARD	931-645-7448	jspainhoward@cityofclarksville.com
5	FRANK LOTT	931-552-0763	frank@blfmarketing.com
6	Ron McClurg	931-221-0741	ron.mcclurg@cityofc.....
7	Brigitte Papastathis	931-645-7426	b.papastathis@cityof clarksville.com
8	Scott Giles	931-920-4935	Scott.Giles@myfmbank.com
9	JEANNE BEFUCHAMP	931-245-3333	kjbscott@aol.com

1:30 meeting  
November 2, 2011

## Focus Group Meetings

	Name	Phone	E-Mail
1	Bruce Dawson	931-551-8999	bdawson@Lms-Tv.com
2	Dee Wagstaff-Williams	931-206-4999	deew@KW.com
3	Dan Gallo	931-551-5470	dan.gallo@usbank.com
4	Kenneth W. Daniel	931-266-4920	Kdaniel@Franklinamerican.com
5	John Rudolph	931-920-6604	john.rudolph@fabk.com
6	Michael Tharpe	931-444-6040	mtharpe@tbtconstructionLLC.com
7	Mary Chapman	931-472-1224	mary.g.chapman@BankofAmerica.com
8	Patricia Downey	931-798-3732	patricia.a.downey@ciwa.gov
9	KP WILLIAMS	931-217-7150	KPWilliams2@gmail.com
10	Kathy Ondras	931-436-0536	Kondras@realtacs.com

6:00 PM

November 3, 2011

## Focus Group Meetings

	Name	Phone	E-mail
1.	Tammy Kilgore	648.6133	tammykilgore@cityofclarksville.com
2.	Jonnie Butterfield	221-7506	butterfieldj@apsu.edu
3.	James W. Hunt	237-4704	drijwh@gmail.com
4.	Harold Vann	647-3937	HaroldFVann@aol.com
5.	Ferret Melindy	(931) 553-0984	ferretmelindy@yahoo.com
6.	Keith Lampkin		
7.			
8.			
9.			
10.			

# FOCUS GROUP MEETING

11/3/11 - 9:00 AM

NAME	Telephone	E-mail
1. Joyce Paggeot	616- <del>4</del> 82-9891	paggeotjoyce@yahoo.com
Robert Davis	542-0381	Firehouse - Robert @ Hotmail
Bill Basinger	<del>8006266709 ext 2085</del>	bill_basinger@bottleknolly.org
Sherry Wingfield	931-933-0970	Sherry@MannaCafeMinistries.com
Ashley Graham	931-552-6656	agraham@las.org
Beverly Dycus	931-648-9090	beverlydycus@urbanministries.us
Linda Wall	931-648-9090	lindawall@urbanministries.us
Susan Jensen	931-647-4291	sjensen@unitedwayofclarksville.org
Brett Smith	931-302-8821	bsmith@clarksvillefirst.com
Erin T. Chapman	931-302-4002	echapman.rmcm@gmail.com
Kenny York	931-933-0970	Kenny@MannaCafeMinistries.com
Jean Nichols	931-648-8826	jean@clarksville.org
Richard Garrett	931-378-0500	reason@leap.org.net

**APPENDIX F**

**CLARKSVILLE MEDIAN INCOME, POVERTY  
AND RACE BY CENSUS TRACT**

**TABLE AND MAP**

**MONTGOMERY COUNTY/CLARKSVILLE POPULATION AND INCOME/POVERTY BY CENSUS TRACT**

Census Tract	Total Population	Overall % Minority	African American Population	% African-American	Hispanic Population	% Hispanic	Income Level	2011 Median Family Income	Median Family Income - % of MSA	% of Population Below Poverty
1001.00	859	35.2%	244	28.4%	35	4.1%	Moderate	30,575	57.1%	38.9%
1002.00	2,002	24.4%	358	17.9%	66	3.3%	Moderate	39,472	73.8%	15.8%
1003.00	4,552	31.3%	1,154	25.4%	124	2.7%	Middle	50,183	93.8%	14.2%
1004.00	3,168	57.7%	1,638	51.7%	115	3.6%	Moderate	30,650	57.3%	35.1%
1005.00	4,474	22.5%	721	16.1%	144	3.2%	Middle	46,764	87.4%	12.9%
1006.01	2,271	11.2%	128	5.6%	45	2.0%	Upper	75,205	140.6%	1.7%
1006.02	2,917	11.5%	177	6.1%	83	2.8%	Upper	66,463	124.2%	10.1%
1007.00	1,357	41.3%	512	37.7%	15	1.1%	Middle	43,795	81.9%	9.4%
1008.00	2,579	54.9%	1,260	48.9%	36	1.4%	Moderate	26,943	50.4%	39.7%
1009.00	3,275	54.3%	1,299	39.7%	309	9.4%	Moderate	34,154	63.8%	21.1%
1010.01	4,560	37.6%	995	21.8%	404	8.9%	Middle	44,758	83.7%	9.6%
1010.02	3,830	47.7%	1,153	30.1%	313	8.2%	Middle	53,259	99.5%	12.4%
1011.01	2,628	42.2%	685	26.1%	205	7.8%	Middle	50,681	94.7%	9.4%
1011.02	7,658	39.7%	1,914	25.0%	618	8.1%	Middle	51,430	96.1%	7.9%
1011.03	2,189	19.9%	252	11.5%	85	3.9%	Middle	53,976	100.9%	11.5%
1012.00	5,493	37.2%	1,097	20.0%	481	8.8%	Middle	50,723	94.8%	8.8%
1013.01	11,091	47.1%	3,365	30.3%	994	9.0%	Middle	49,846	93.2%	12.9%
1013.02	6,482	45.1%	1,801	27.8%	545	8.4%	Middle	58,064	108.5%	6.7%
1014.00	6,242	35.0%	1,208	19.4%	613	9.8%	Middle	55,084	103.0%	7.2%
1015.00	7,253	13.8%	424	5.8%	257	3.5%	Upper	66,827	124.9%	7.6%
1016.00	4,999	13.3%	474	9.5%	83	1.7%	Middle	60,776	113.6%	11.5%
1017.00	7,369	5.4%	193	2.6%	86	1.2%	Middle	57,523	107.5%	9.3%
1018.01	7,585	11.2%	419	5.5%	147	1.9%	Upper	82,379	154.0%	3.7%
1018.02	7,143	7.1%	253	3.5%	114	1.6%	Upper	67,244	125.7%	4.1%
1019.01	6,532	20.7%	944	14.5%	195	3.0%	Upper	67,731	126.6%	5.9%
1019.02	2,560	16.2%	196	7.7%	78	3.0%	Upper	90,137	168.5%	2.4%
1020.00	13,700	30.4%	2,632	19.2%	770	5.6%	Middle	62,895	117.6%	6.4%



Map of Clarksville with Estimated typical (median) income of a household between 2005-2009.

Estimated typical (median) income of a household between 2005-2009.

Estimated median household income in the past 12 months, as reported between 2005-2009. A household includes all the people who occupy a housing unit as their usual place of residence. Medians were suppressed in cases where the sample of the average was less than 10 of the unit that is being described (eg, households, people, householders, etc). Such areas are represented as having "Insufficient Data" in the map. ACS employs values to indicate top and bottom ranges of income. A value of 250,001 indicates a value of 250,000 or greater, whereas a value of 2,499 indicates a value of 2,500 or less.

**Legend**

Year  
2009

Variable  
\$

- Insufficient Data
- \$34,999 or less
- \$35,000 - \$53,299
- \$53,300 - \$66,999
- \$67,000 or more

Shaded by: Census Tract  
Source: Census

