

The following draft list presents the private and public sector impediments found in the **LORAIN COUNTY**.

### ***Private Sector***

#### ***1. Impediment: Denial of available housing units in the rental markets***

The review of fair housing cases and results of the fair housing survey both supported denial of available housing units in the rental market as an impediment to fair housing choice in the Region. Denial of housing in the rental markets was found to be most frequently based on race, disability, and familial status.

Suggestion: Additional training for landlords and property managers. Conduct additional complaint based testing related to unlawful denials.

#### ***2. Impediment: Discriminatory terms, conditions, privileges, or facilities relating to rental***

The inclusion of discriminatory terms, conditions, privileges, or facilities relating to rental as an impediment to fair housing choice within the Region was predominantly supported by fair housing complaint data and was shown to mostly affect the classes of familial status, race, and disability.

Suggestion: Additional training for landlords and property managers. Conduct additional complaint based testing related to unlawful discrimination.

#### ***3. Impediment: Failure to make reasonable accommodations or modifications***

Failure to make reasonable accommodation or modification, which was found to most commonly affect persons with both physical and mental disabilities, was supported by findings from analysis of fair housing complaint data as well as from input from the fair housing forum and fair housing surveys.

Suggestion: Additional training for landlords and property managers. Conduct additional complaint based and audit testing related to reluctance to make reasonable accommodation or modification.

#### ***4. Impediment: Steering activities in the rental markets***

Steering activities by rental housing entities was cited primarily in the fair housing survey and was shown to be based on race and national origin.

Suggestion: Additional training for landlords and property managers.

5. *Impediment:* Preferences stated in advertisements for rental housing

Evidence of statement of preferences in advertisements for rental housing as an impediment to fair housing choice within the Region was found in review of fair housing complaint data.

Suggestion: Additional training for landlords and property managers. Research possible violation in media and Craigslist. Conduct mitigation if found.

6. *Impediment:* Denial of availability of housing in the home purchase markets

Denial of the availability of housing in the real estate markets, predominantly based on national origin and race, was supported by review of fair housing complaint data and the results of the fair housing survey.

Suggestion: Additional training for real estate agents, brokers, and others involved in real estate transactions.

7. *Impediment:* Steering activities in home sales markets

In the Region, steering activities in the home purchase markets was found to be an impediment to fair housing choice based on findings from review of past fair housing studies and cases and results of the fair housing survey. Classes found to be commonly affected included national origin and race.

Suggestion: Additional training for real estate agents, brokers, and others involved in real estate transactions.

8. *Impediment:* Denial of home purchase loans

Denial of home purchase loans was supported as an impediment to fair housing choice in the Region through examination of Home Mortgage Disclosure Act data as well as results of the fair housing survey. Denial was found to be predominantly based on race, national origin, and gender.

Suggestion: Utilize resources for first-time and lower-income homebuyers that belong to race, ethnic, and gender protected classes so that they can improve their credit ratings, recognize questionable lending practices, and gain access to the fair housing system.

9. *Impediment:* Predatory lending in the home purchase market

Many sources, including past fair housing studies and cases, Home Mortgage Disclosure Act data, and results of the fair housing survey identified predatory lending in the lending market as an impediment to fair housing choice within the Region. The classes of race and national origin were most frequently linked to this impediment.

Suggestion: Utilize resources for first-time and lower-income homebuyers that belong to race, ethnic, and gender protected classes so that they can improve their credit ratings, recognize questionable lending practices and the attributes of predatory style loans, and gain access to the fair housing system.

10. *Impediment*: Failure to comply with accessibility requirements in construction of housing units

Disabled persons were found to be affected by the impediment of failure to comply with accessibility requirements in construction of housing units. This impediment was supported by findings of the fair housing survey.

Suggestion: Additional training for building permit inspectors, developers, and architects. Conduct audit based testing related to the lack of accessible building practices, thereby measuring the actual size of the construction challenge.

11. *Impediment*: Inequitable investment of Community Reinvestment Act resources

Review of Community Reinvestment Act data showed that community lending is inequitable within the Region and some areas may not receive even investment activity which may affect fair housing choice for several classes. This also tends to limit opportunities in areas that are lacking in investment.

Suggestion: Monitor community reinvestment act activities and encourage specific lenders to move investment opportunities to areas of the region that tend to have lacked sufficient levels of investment in the past. This would be designed to enhance opportunities and expand economic development in areas typically underserved by such activities.

**Public Sector**

1. *Impediment*: Failure to have sufficient fair housing policies or practices by several units of local government

Results of the Fair Housing Surveys indicate that a number of local communities lack or do not have sufficient policies or practices that adequately address the duty to affirmatively further fair housing.

Suggestion: Construct a guidebook that lists a series of best practices that are appropriate for the communities in Northeast Ohio, as they relate to promoting consistent, current, and transparent policies and practices that affirmatively further fair housing.

2. *Impediment:* Ineffective fair housing outreach and education efforts

While Northeast Ohio tends to have a strong fair housing advocacy base, there still seems to be an ineffective fair housing outreach and education component to the advocacy efforts. This was supported by input received in the fair housing survey as well as in the fair housing forums.

Suggestion: Conduct more outreach and educational activities in a uniform, methodical, and consistent fashion. This should be done in consort with local units of government as sponsors.

3. *Impediment:* Land use and planning decisions and operational practices resulting in unequal access to government services such as transportation

Unequal access to government services, such as transportation, due to land use and planning decisions as well as operational practices was documented in a review of Census Bureau data and the fair housing survey. The classes noted to be most frequently affected are disability, familial status, race, and national origin.

Suggestion: Enhance the reach and access of the public transportation system so that persons belonging to protected classes have improved access to the transportation service. This means better connecting their places of residence with prospective employment training and employment opportunities.

4. *Impediment:* Historical establishment of policies and practices resulting in segregation of minority populations

Fair housing choice in the Region is today affected by historical policies and practices that have resulted in segregation of minority populations. This impediment may restrict housing choice based on race, national origin, and disability.

Suggestion: Acknowledge that some legacy decisions, made long ago, may not have resulted in a more integrated Northeast Ohio. This means that today's publicly assisted housing location decisions should take into account the existing racial and ethnic make-up of the population and that this decision should address whether the likely clients of the new facility will make racial and ethnic concentrations higher or lower than they were before the facility was to be constructed.

Suggestion 2: As demonstrated in the spatial mapping of the location of housing choice vouchers, acceptance and use of this housing option tends to be concentrated in selected areas of the NEOSCC Region. Administrators of housing choice voucher programs may wish to consider two actions: a) operate a two-tier tenant certification program (in tier one, teach prospective tenants how to properly care for their rental units; in tier two, work with prospective tenants to increase their credit scores), and b) conduct outreach and education to prospective landlords about the certified and prepared tenants graduating from the certification program.

5. *Impediment*: Implementation of exclusionary policies

The fair housing survey revealed instances of policies that may restrict housing development, such as limiting lot size, dwelling type, and related locational issues. Therefore housing choice for certain groups, including families and persons with disabilities, is constrained. This is sometimes considered NIMBYism.

Suggestion: Consider a public relations campaign, or at least an outreach and education process to better communicate the benefits of constructing affordable housing throughout the region.