

Regional Analysis of Impediments to Fair Housing Choice

Data and Preliminary Findings

Public Input

Medina County



Regional AI Fair Housing Forums
March 11-15, 2013



FAIR HOUSING FORUMS - PROTOCOLS

- 1. PUBLIC COMMENT WILL BE HELD AT THE END OF THE PRESENTATION**
- 2. HOLD ALL QUESTIONS UNTIL THE ENTIRE PRESENTATION HAS BEEN MADE.**
- 3. IN ORDER FOR EVERYONE TO HAVE AN OPPORTUNITY, INDIVIDUALS WILL BE GIVEN UP TO 3 MINUTES DURING THE PUBLIC COMMENT PORTION OF THE MEETING ON THE TOPIC OF THE PRESENTATION.**
- 4. ANYONE THAT HAS QUESTIONS ABOUT THE OVERALL NEOSCC/VIBRANT NEO PROCESS SHOULD CONTACT JEFF ANDERLE, 330-375-2949 OR JANDERLE@NEOSCC.ORG**



IN 2010, 23 NORTHEAST OHIO ORGANIZATIONS COLLABORATED ON A PROPOSAL TO THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT (HUD) AS PART OF THE PARTNERSHIP FOR SUSTAINABLE COMMUNITIES INITIATIVE. THE INITIATIVE IS AN INTERAGENCY COLLABORATION AMONG HUD, THE U.S. DEPARTMENT OF TRANSPORTATION, AND THE U.S. ENVIRONMENTAL PROTECTION AGENCY.

RESULT: \$4.25M FEDERAL GRANT.

THE NORTHEAST OHIO SUSTAINABLE COMMUNITIES CONSORTIUM (NEOSCC) IS A 33-MEMBER CONSORTIUM OF METROPOLITAN PLANNING AGENCIES, MUNICIPAL AND COUNTY GOVERNMENTS, GOVERNMENT AGENCIES AND NON-PROFITS .



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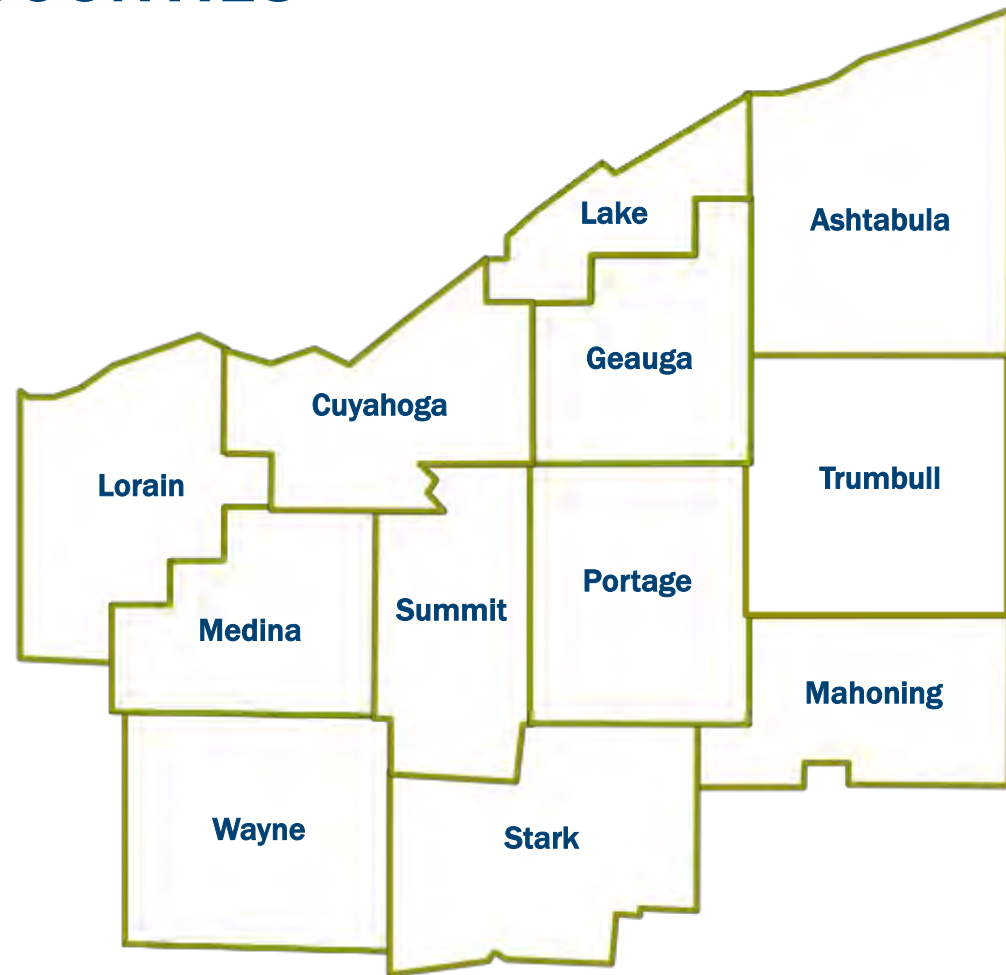
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VIBRANT NEO 2040 IS A THREE YEAR PLANNING PROCESS ACROSS 12 COUNTIES

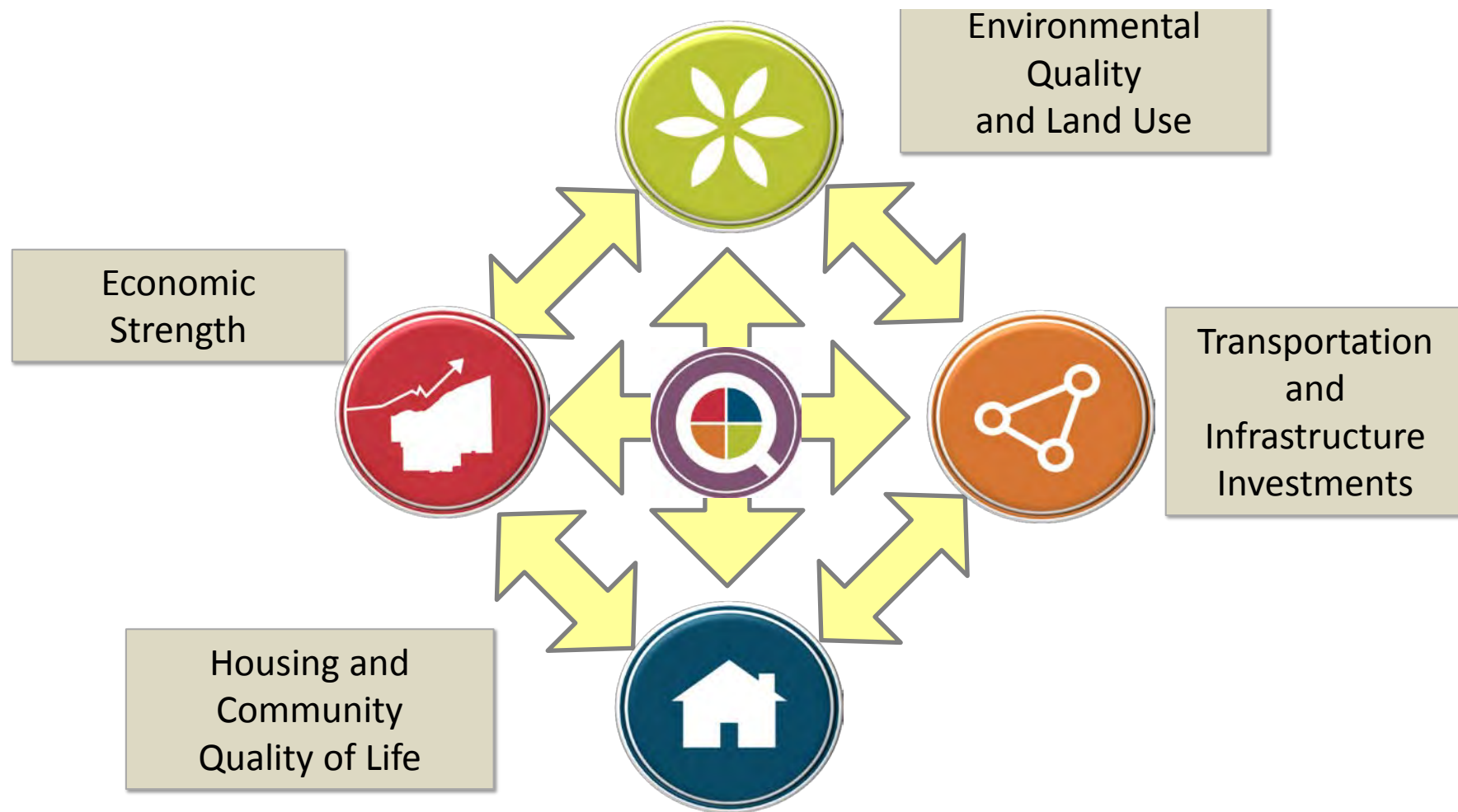
Who: Engage stakeholders throughout the region through different ways and methods.

How: Regional engagement using a scenario planning process that creates a shared vision.

What: A framework to create a more vibrant, resilient and sustainable Northeast Ohio.



Where do we want to go as a region?



Quality Connected Places

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Why Conduct a Regional AI?

- Results of Fair Housing Study will be integrated into the Vibrant NEO Scenario Planning Process.
- This study can also be used at a local level by entitlement communities as their own Analysis of Impediments to Fair Housing Choice.

NEOSCC Regional AI

**Jurisdictions receiving federal
funds for housing and
community development must:**

**Certify that they are affirmatively
furthering fair housing (AFFH)
as a condition of receiving these funds
from HUD**



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NEOSCC Regional AI

Certification means three things*:

- ☐ Conduct an AI
- ☐ Take action on impediments if impediments are found
- ☐ Maintain records of actions

*** Means Three Things for the Consolidated Planning Process**

NEOSCC Regional AI

Include FHEA Elements:

- ☐ **Measuring racial and ethnic isolation and segregation in the Region**
- ☐ **Identifying racially and ethnically concentrated areas of poverty**
- ☐ **Evaluating access to opportunity**
- ☐ **Reducing social and economic disparities**

NEOSCC Regional AI

Purposes of the study:

- ☐ Identify any impediments to fair housing choice
- ☐ Determine equity concerns
- ☐ Recommend actions that address impediments and equity barriers

Purposes of Today's Meeting

- ☐ Advise you of some preliminary findings
- ☐ Offer you opportunity to comment on what direction these findings are pointing toward
- ☐ Provide us with your opinions about fair housing issues, potential impediments, barriers to equity and opportunity, and how to best address them

NEOSCC Regional AI Thirteen Fair Housing Forums

- ☐ **Present you with context, fair housing information, and preliminary results of our analysis**
- ☐ **Receive comments, input, and your experiences with fair housing**

Definition of Impediments to Fair Housing Choice:

**Actions, omissions, or decisions
that restrict housing choice
because of protected class
status**

Who is protected?

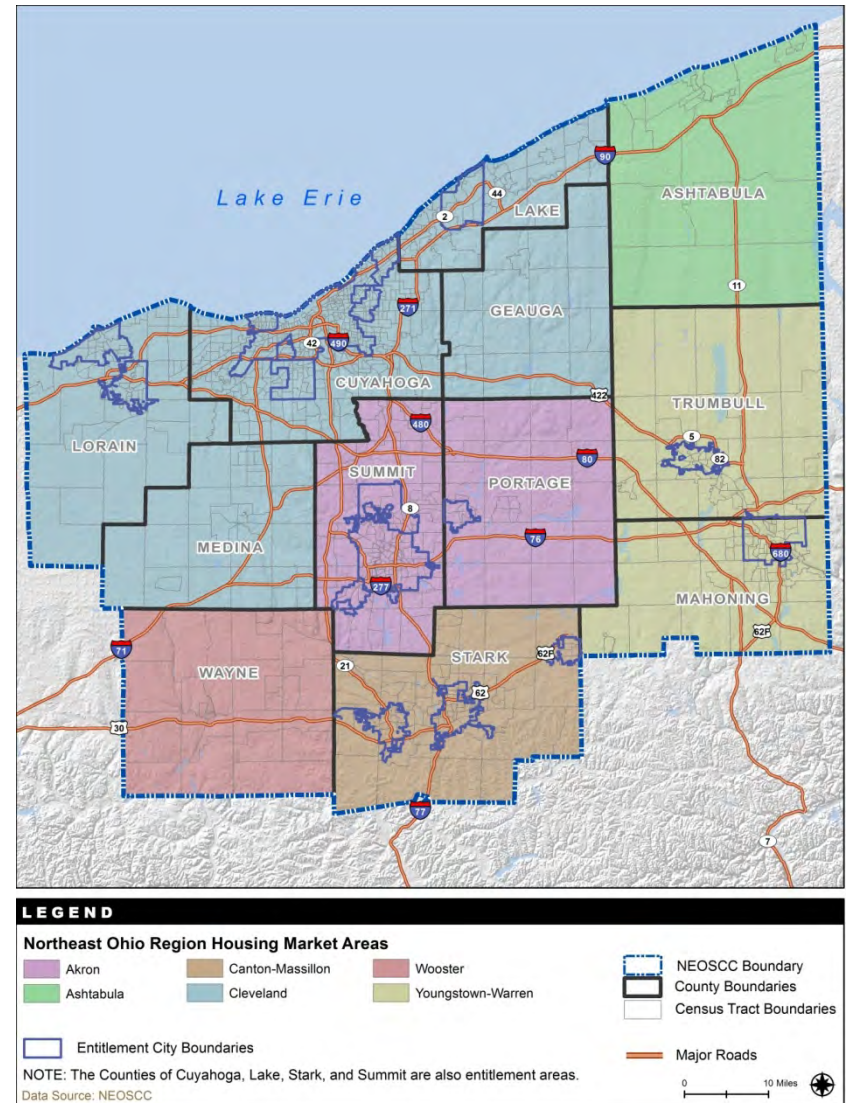
**Protected classes
under Ohio and or Federal law:**

**Race, color, sex, national origin,
ancestry, religion, disability, familial
status or military status**

NEOSCC Region

**Comprises: Six
Housing Markets,
12 Counties,**

**18 Entitlement cities
4 Entitlement counties
8 Non-entitled county
areas**



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Regional AI Organization

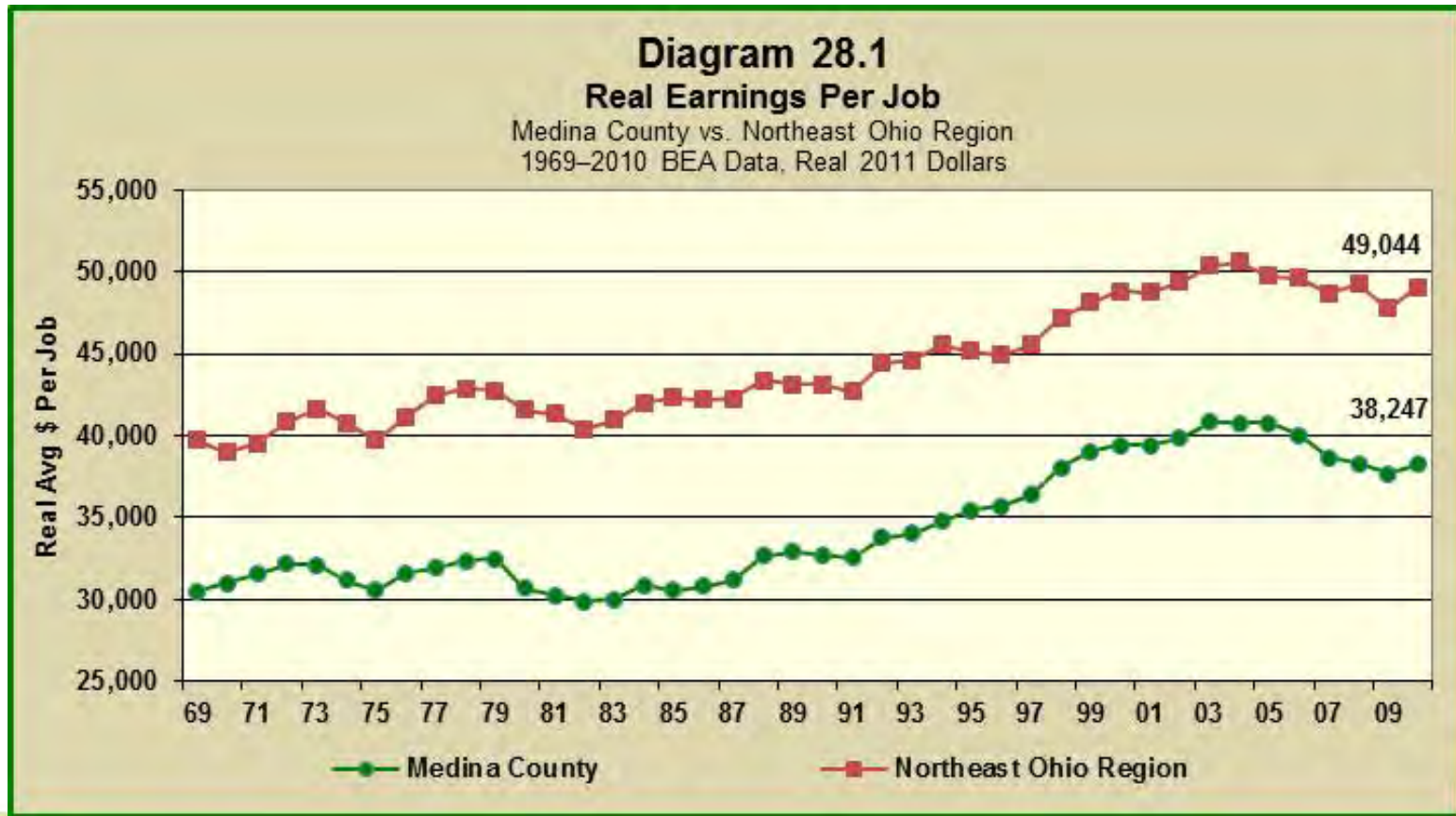
Report Organization	
Volume I	
1. Northeast Ohio Region	23. Lorain
2. Akron Housing Market Area	24. Remainder of Lorain County
3. Ashtabula Housing Market Area	25. Mahoning County
4. Canton-Massillon Housing Market Area	26. Youngstown
5. Cleveland Housing Market Area	27. Remainder of Mahoning County
6. Wooster Housing Market Area	28. Medina County
7. Youngstown-Warren Housing Market Area	29. Portage County
	30. Kent
Volume II	
8. Ashtabula County	31. Remainder of Portage County
9. Cuyahoga County	32. Stark County
10. Cleveland	33. Alliance
11. Cleveland Heights	34. Canton
12. East Cleveland	35. Massillon
13. Euclid	36. Remainder of Stark County
14. Lakewood	37. Summit County
15. Parma	38. Akron
16. Remainder of Cuyahoga County	39. Barberton
17. Geauga County	40. Cuyahoga Falls
18. Lake County	41. Remainder of Summit County
19. Mentor	42. Trumbull County
20. Remainder of Lake County	43. Warren
21. Lorain County	44. Remainder of Trumbull County
22. Elyria	45. Wayne County
	46. Cuyahoga Urban County

Regional AI Presentation

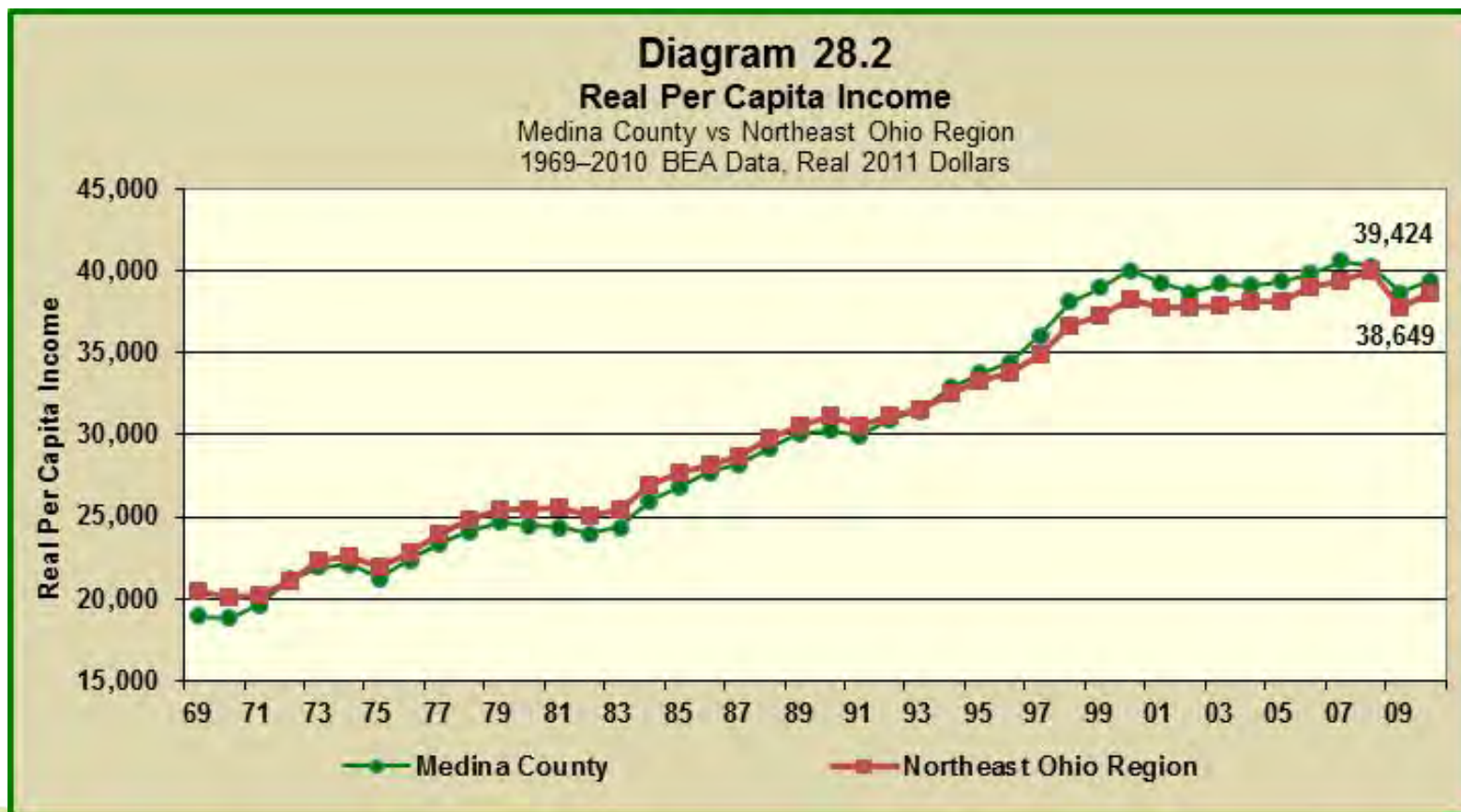
Methodology and Research Actions

- ☐ **Implemented surveys**
- ☐ **Conducted research and collected data**
- ☐ **Conducted qualitative analysis**
- ☐ **Conducted quantitative analysis**
- ☐ **Now are embarking on public input phase**
- ☐ **Following this, make recommendations**

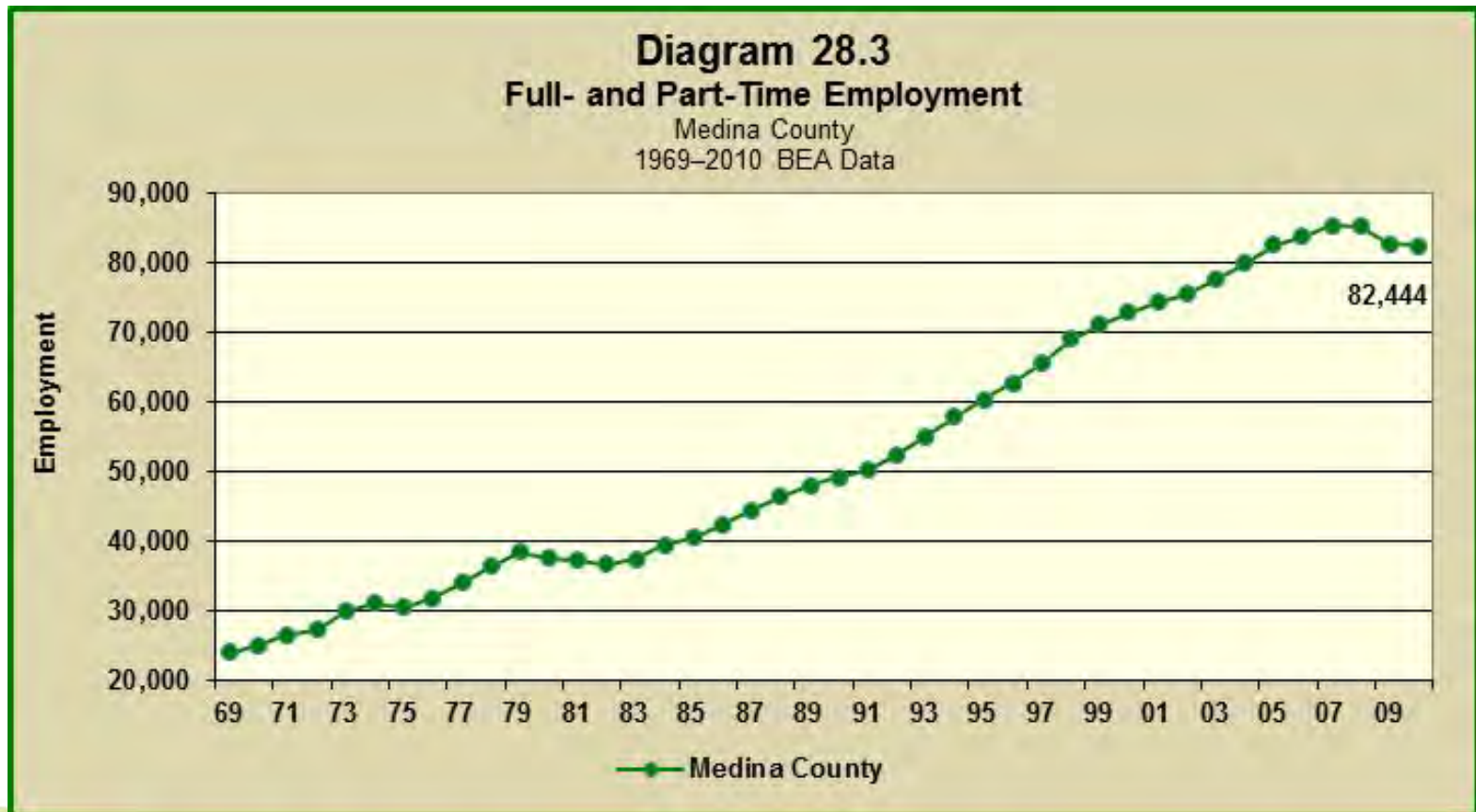
Economics



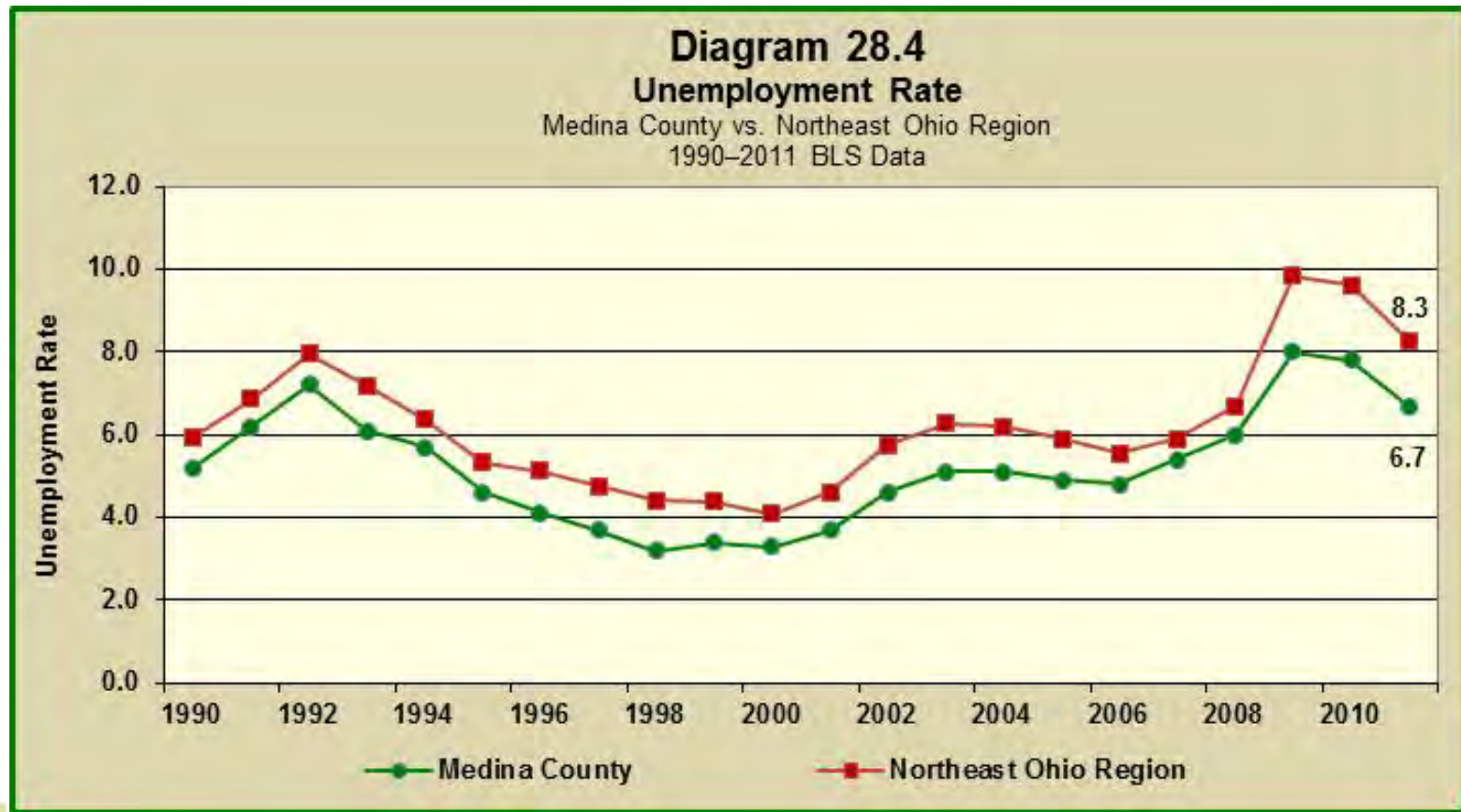
Economics



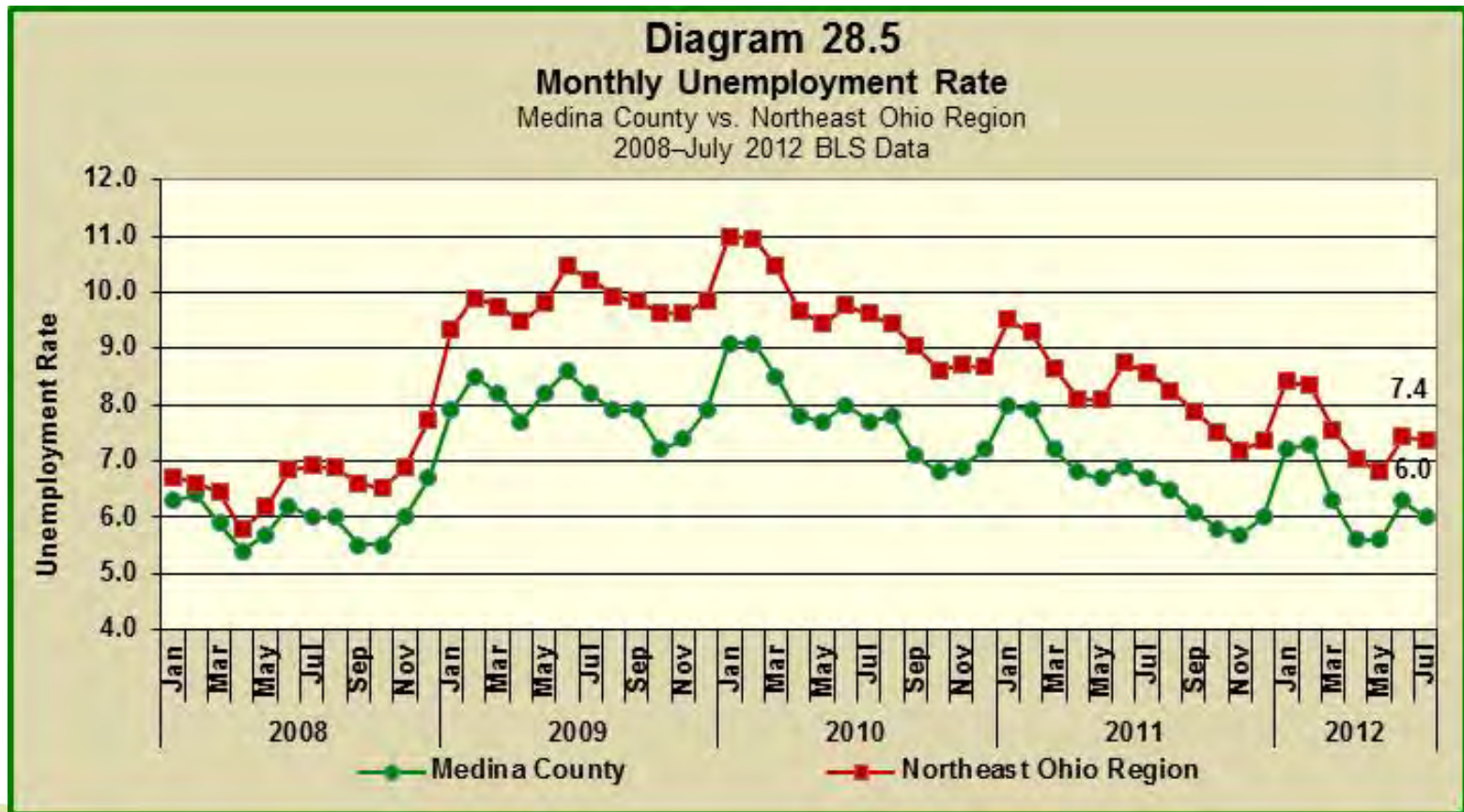
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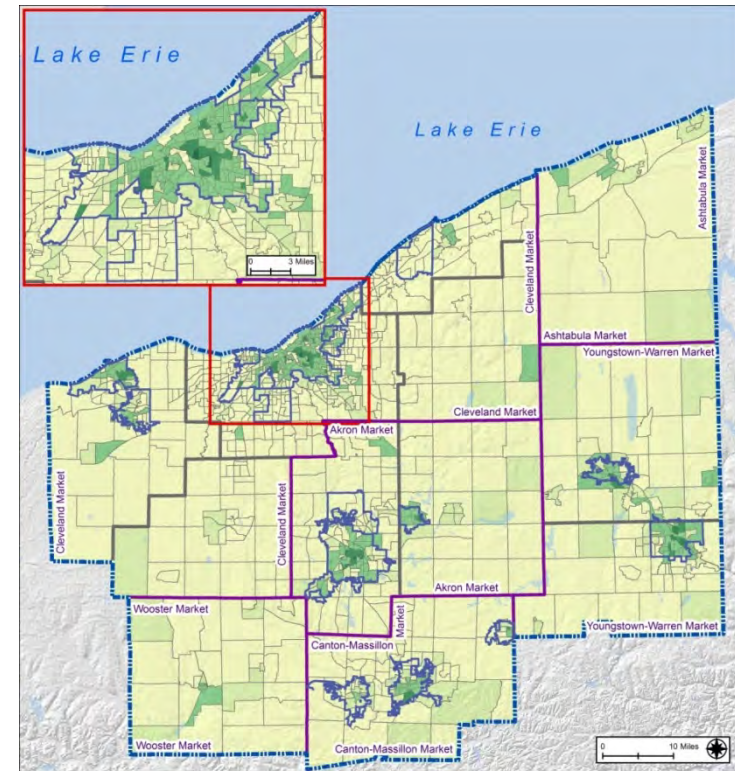
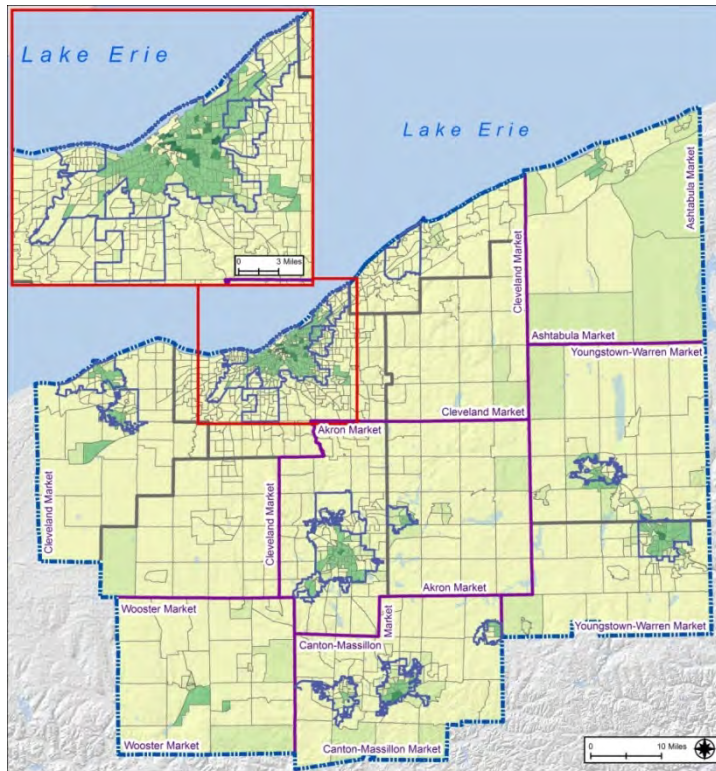
Economics



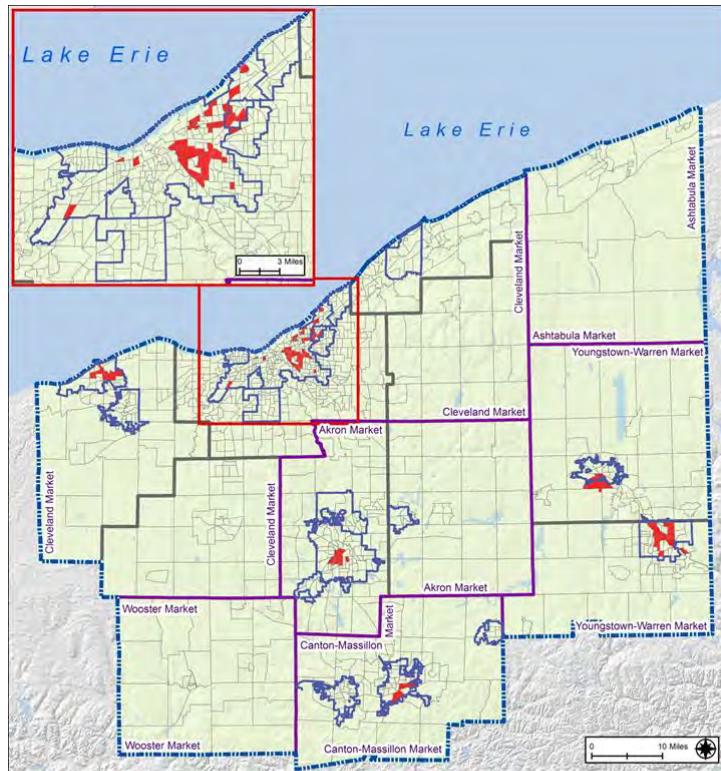
Economics



2000 Census vs 2010 ACS Poverty



Racial/Ethnic area-Concentrated Poverty



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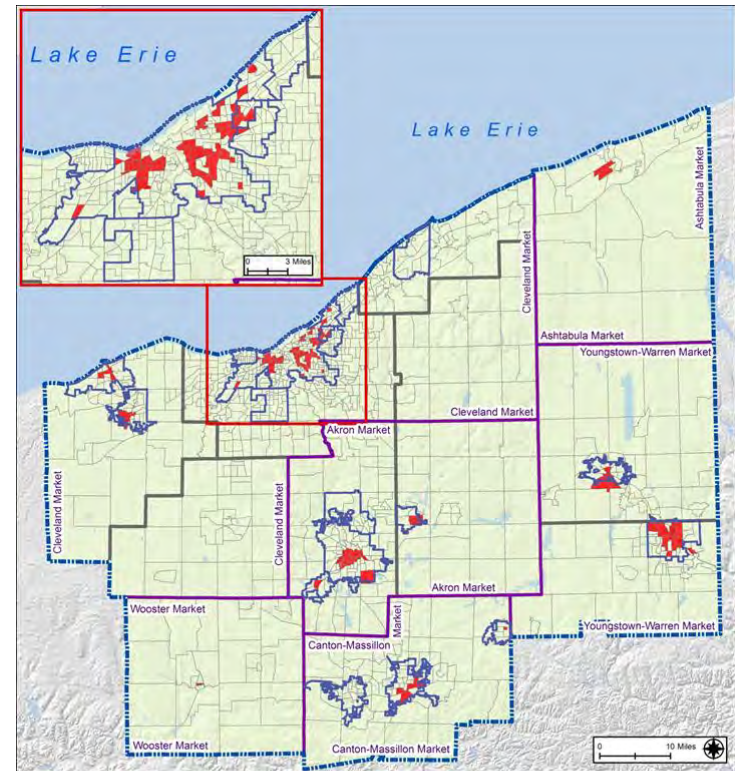
2006–2010 Racially Concentrated Areas of Poverty

A Census tract is considered a racially concentrated area of poverty (RCAP) when 50 percent or more of the population are non-white AND 40 percent or more of the total population are in poverty.

- RCAPs
- Non-RCAP Census Tracts
- Entitlement City Boundaries
- NEOSCC Boundary
- Housing Market Boundaries

NOTE: The Counties of Cuyahoga, Lake, Stark, and Summit are also entitlement areas.

Data Source: 2006–2010 ACS



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2006–2010 Ethnically Concentrated Areas of Poverty

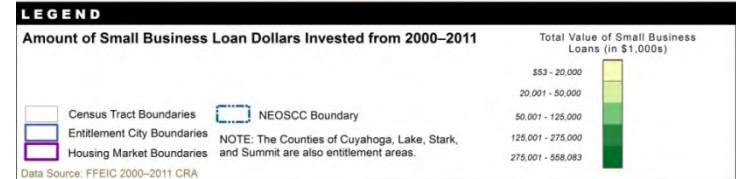
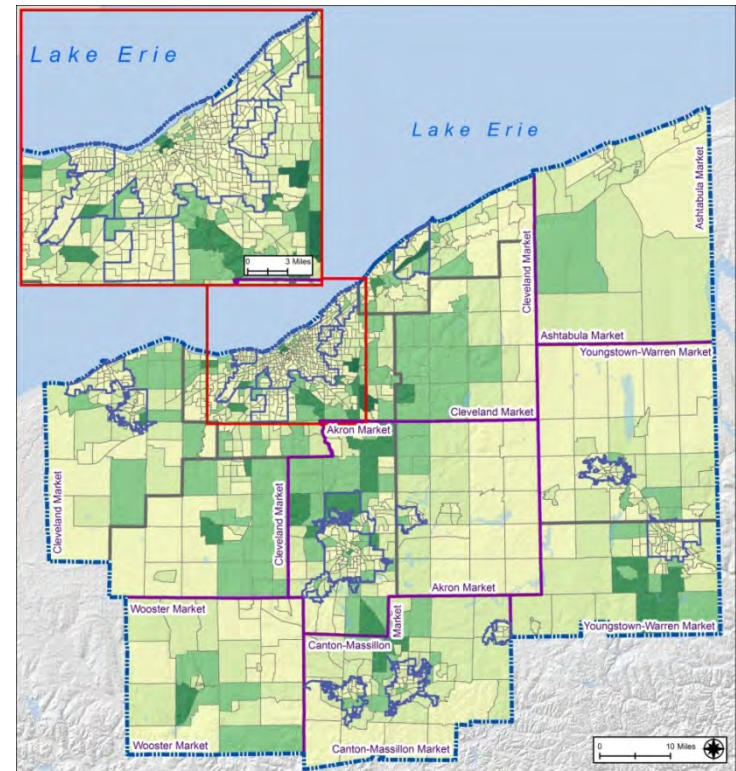
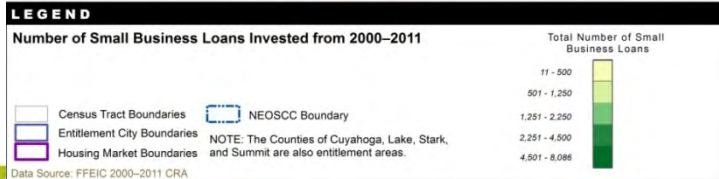
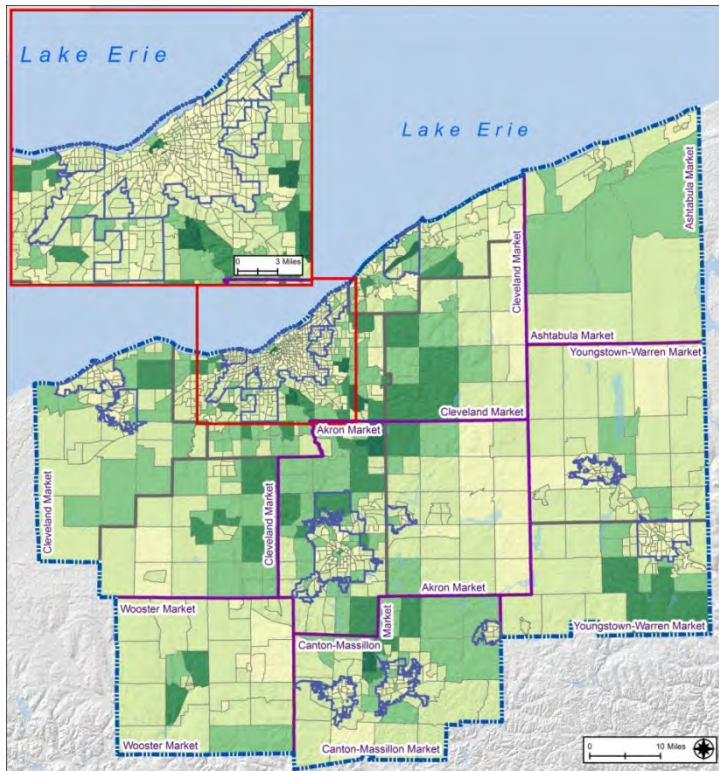
A Census tract is considered an ethnically concentrated area of poverty (ECAP) when 50 percent or more of the population are Hispanic AND 40 percent or more of the total population are in poverty.

- ECAPs
- Non-ECAP Census Tracts
- Entitlement City Boundaries
- NEOSCC Boundary
- Housing Market Boundaries

NOTE: The Counties of Cuyahoga, Lake, Stark, and Summit are also entitlement areas.

Data Source: 2006–2010 ACS

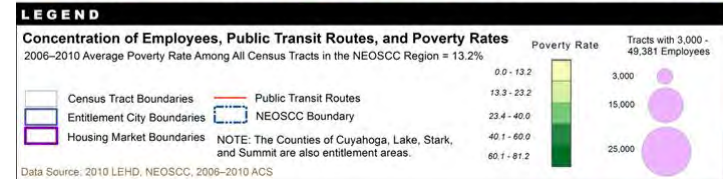
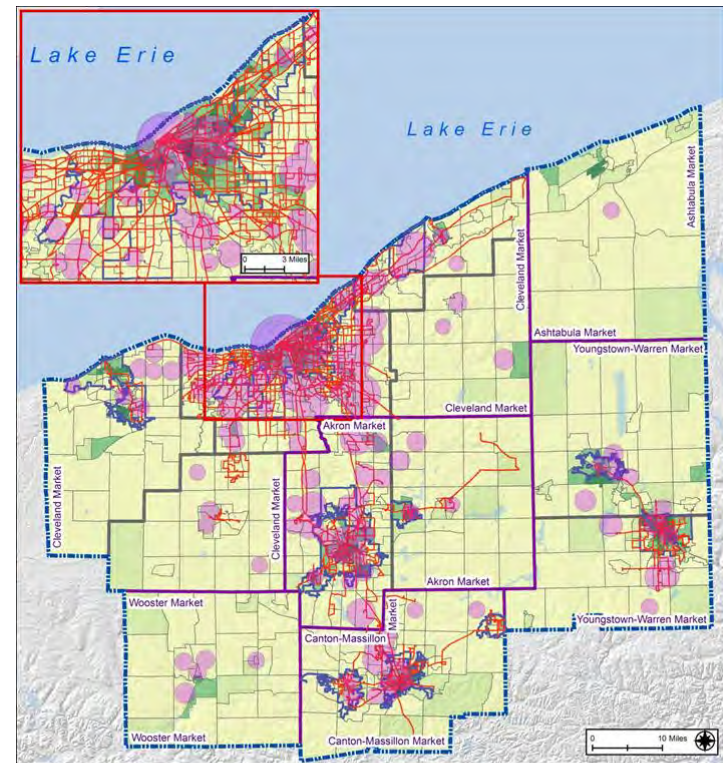
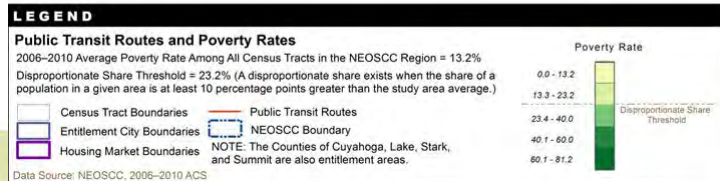
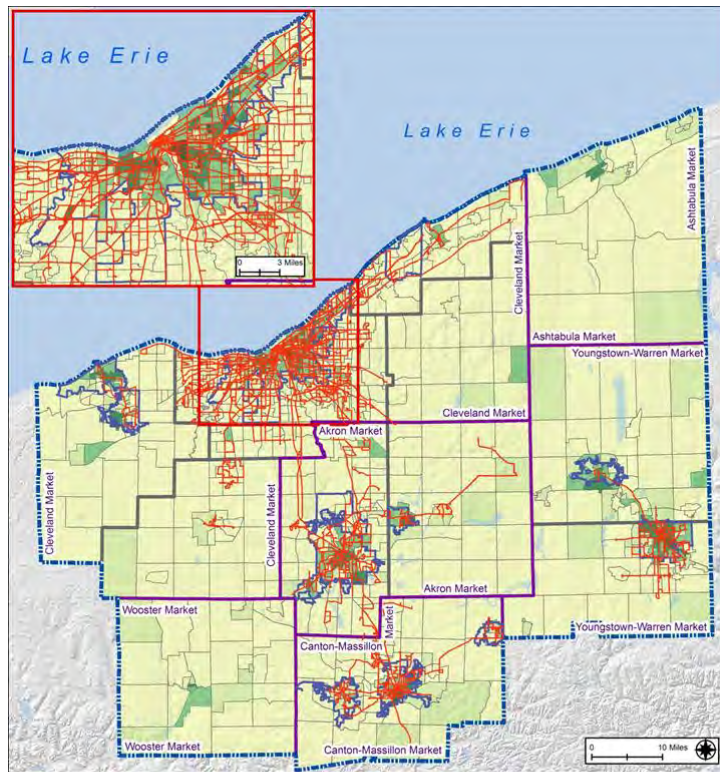
Small Business Lending 2000-11



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Public Transit, Poverty, Employment

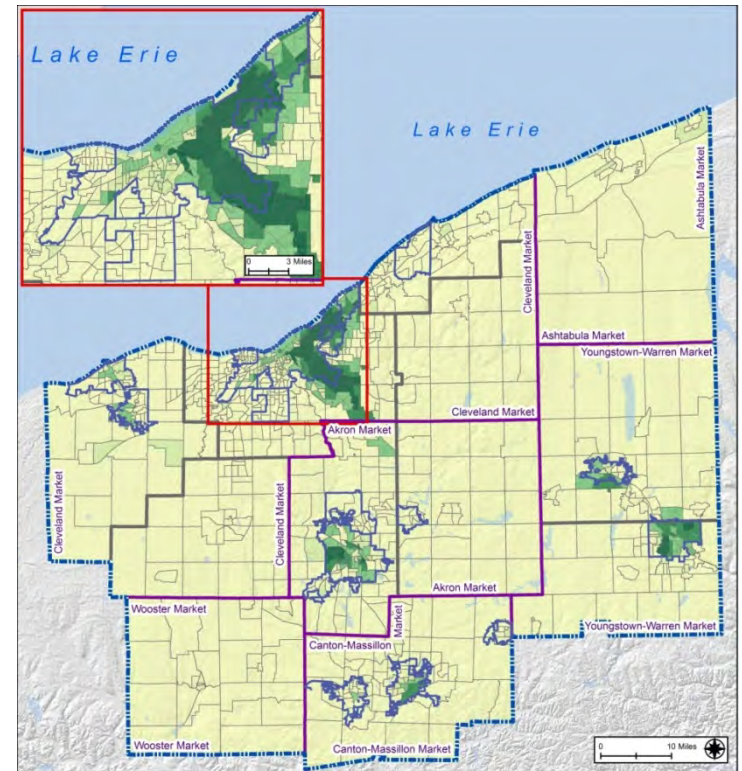
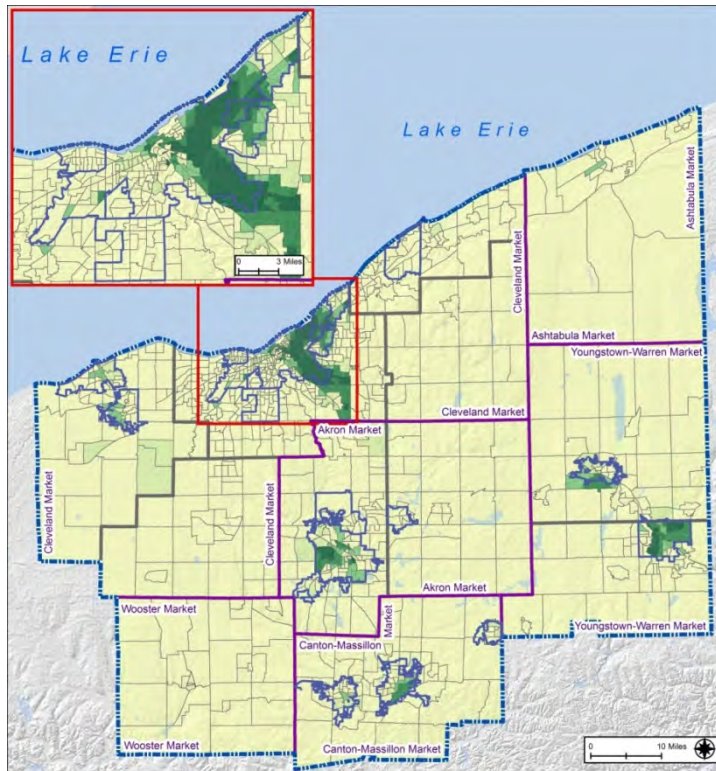


Demographics

Table 28.3
Population by Race and Ethnicity
 Medina County
 2000 & 2010 Census SF1 Data

Race	2000 Census		2010 Census		% Change 00-10
	Population	% of Total	Population	% of Total	
White	146,956	97.3%	165,642	96.1%	12.7%
Black	1,323	.9%	2,027	1.2%	53.2%
American Indian	232	.2%	247	.1%	6.5%
Asian	969	.6%	1,660	1.0%	71.3%
Native Hawaiian/Pacific Islander	25	.0%	18	.0%	-28.0%
Other	375	.2%	652	.4%	73.9%
Two or More Races	1,215	.8%	2,086	1.2%	71.7%
Total	151,095	100.0%	172,332	100.0%	14.1%
Hispanic (Ethnicity)	1,399	.9%	2,747	1.6%	96.4%

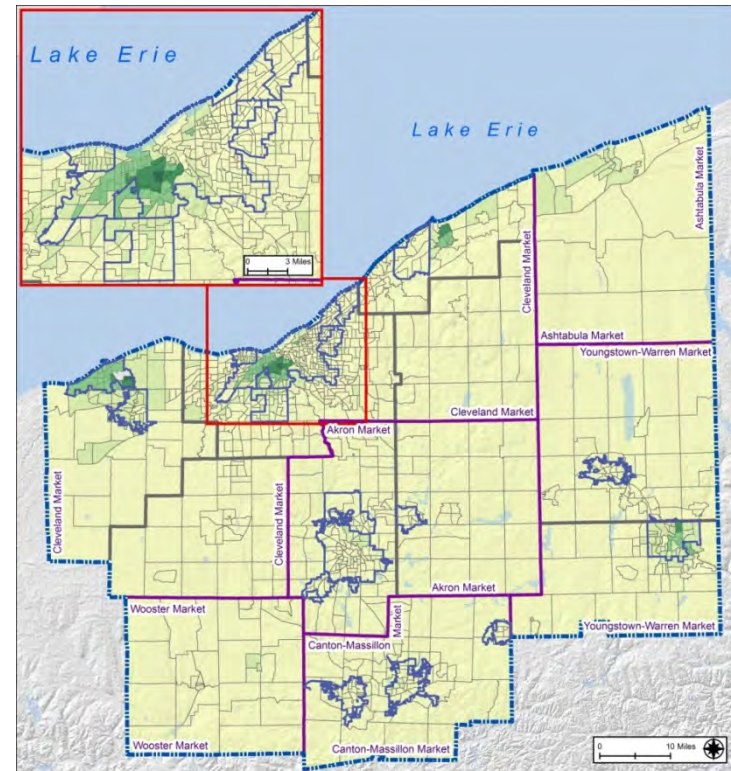
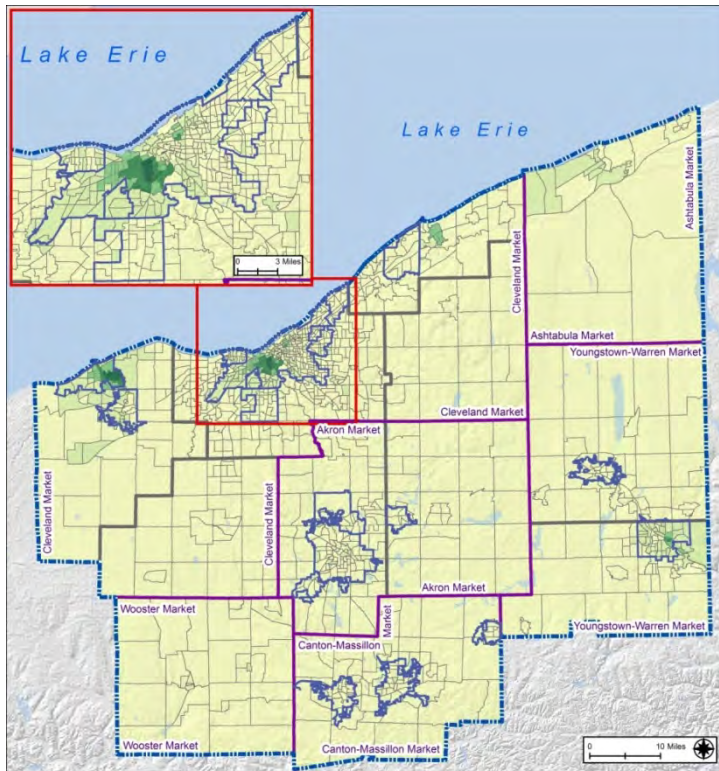
2000 vs 2010 Black Pop. Distribution



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2000 vs 2010 Hispanic Pop. Distribution

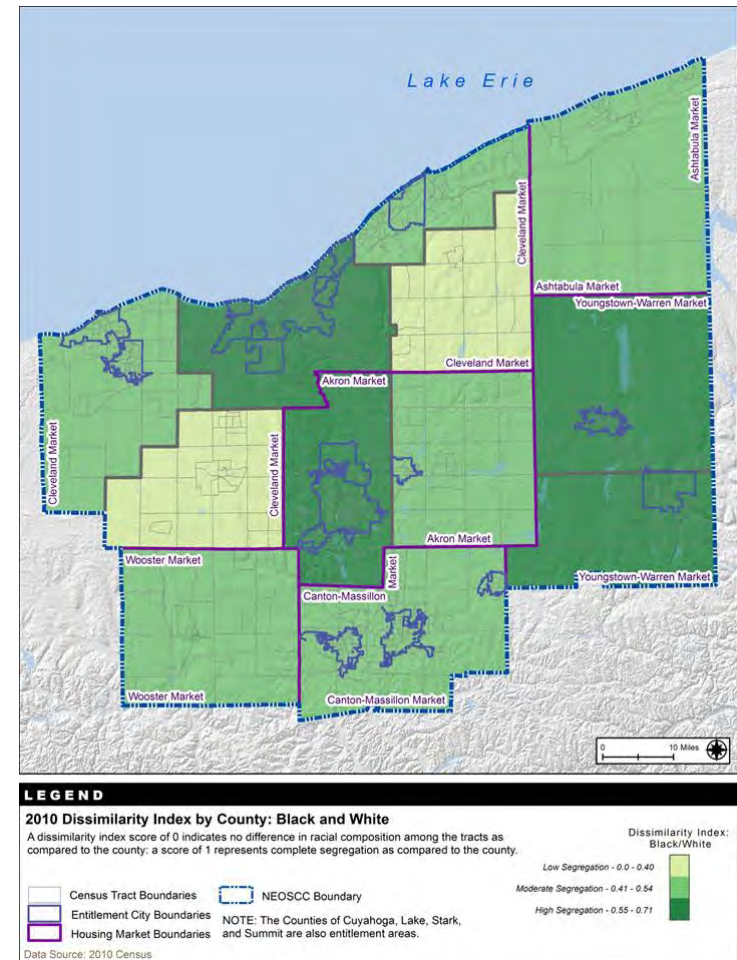
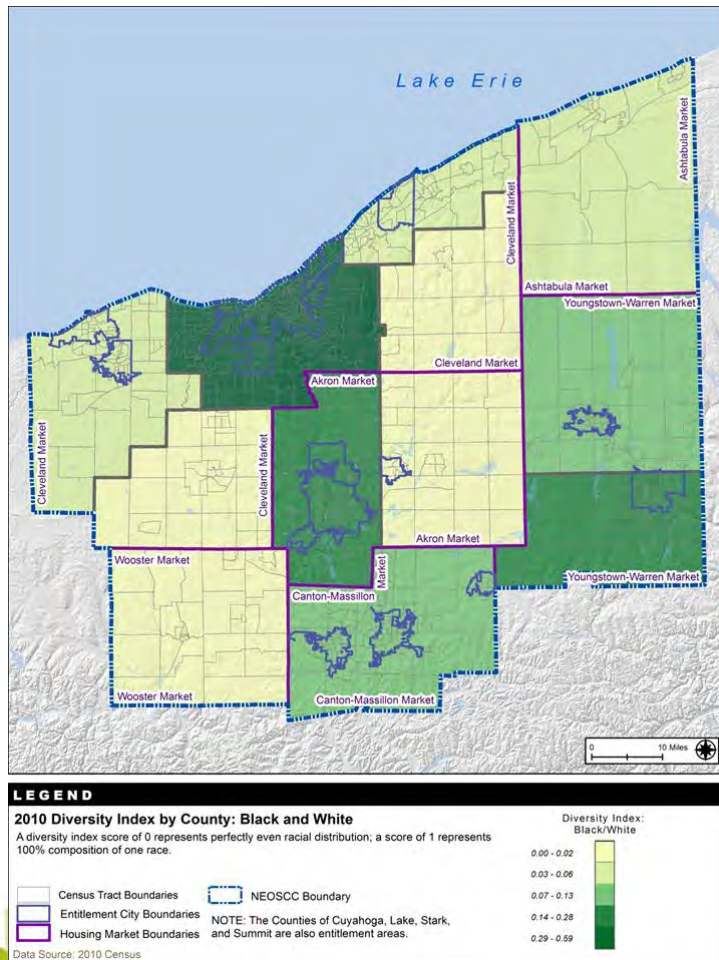


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VIBRANT
NEO2040

Diversity and Dissimilarity Index: B vs W



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County Segregation Indices

Segregation Indices Northeast Ohio Region 2010 Census Data				
County	Black Isolation Index	Hispanic Isolation Index	Black/White Diversity Index	Black/White Dissimilarity Index
Ashtabula	0.07	0.03	0.17	0.50
Cuyahoga	0.40	0.12	0.54	0.71
Geauga	0.03	0.00	0.10	0.34
Lake	0.07	0.12	0.19	0.54
Lorain	0.12	0.14	0.22	0.52
Mahoning	0.34	0.07	0.44	0.70
Medina	0.01	0.00	0.06	0.32
Portage	0.04	0.00	0.12	0.42
Stark	0.18	0.01	0.26	0.54
Summit	0.29	0.01	0.36	0.60
Trumbull	0.21	0.00	0.30	0.61
Wayne	0.02	0.01	0.11	0.47
Northeast Ohio Region	0.08	0.01	0.12	0.38

Housing

Table 28.10
Housing Units by Tenure
 Medina County
 2000 & 2010 Census SF1 Data

Tenure	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
Occupied Housing Units	54,542	96.0%	65,143	94.2%	19.4%
Owner-Occupied	44,316	81.3%	52,536	80.6%	18.5%
Renter-Occupied	10,226	18.7%	12,607	19.4%	23.3%
Vacant Housing Units	2,251	4.0%	4,038	5.8%	79.4%
Total Housing Units	56,793	100.0%	69,181	100.0%	21.8%

Housing

Table 28.11
Disposition of Vacant Housing Units
 Medina County
 2000 & 2010 Census SF1 Data

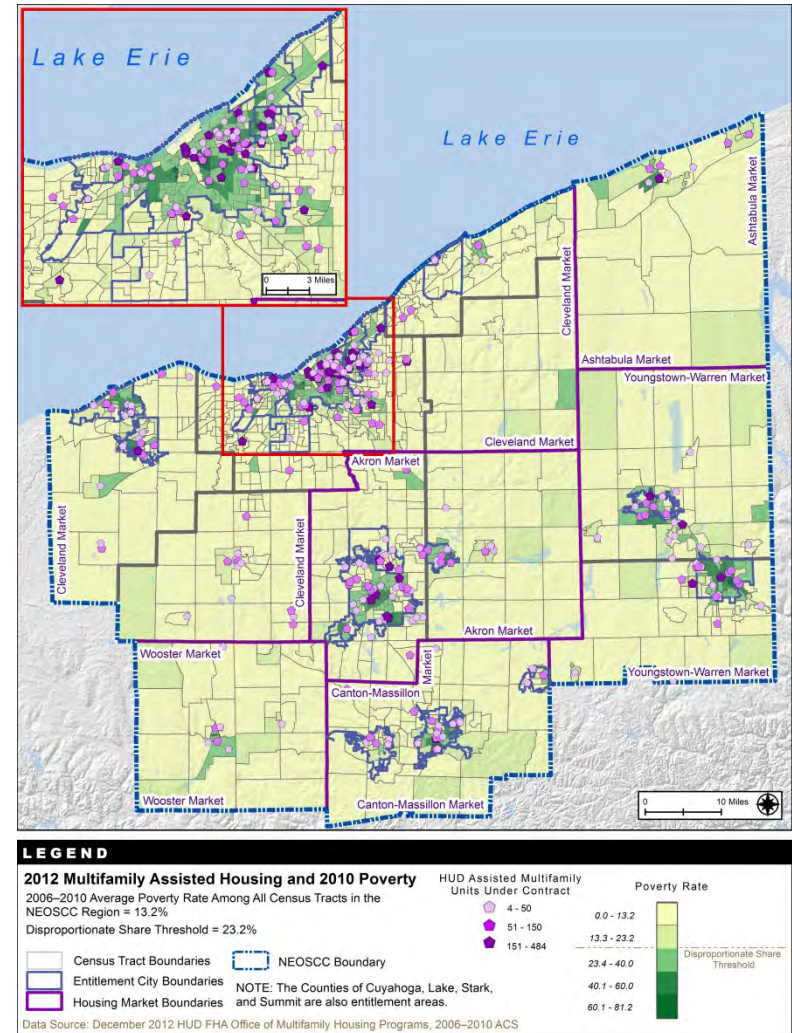
Disposition	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
For Rent	733	32.6%	1,400	34.7%	91.0%
For Sale	502	22.3%	880	21.8%	75.3%
Rented or Sold, Not Occupied	330	14.7%	291	7.2%	-11.8%
For Seasonal, Recreational, or Occasional Use	298	13.2%	443	11.0%	48.7%
For Migrant Workers	1	.0%	0	.0%	-100.0%
Other Vacant	387	17.2%	1,024	25.4%	164.6%
Total	2,251	100.0%	4,038	100.0%	79.4%

Housing

Table 28.9
Housing Units by Type
 Medina County
 2000 Census SF3 & 2010 Five-Year ACS Data

Unit Type	2000 Census		2010 Five-Year ACS	
	Units	% of Total	Units	% of Total
Single-Family	47,990	84.5%	57,803	85.2%
Duplex	1,487	2.6%	1,573	2.3%
Tri- or Four-Plex	1,269	2.2%	1,157	1.7%
Apartment	5,342	9.4%	6,358	9.4%
Mobile Home	703	1.2%	900	1.3%
Boat, RV, Van, Etc.	2	.0%	15	.0%
Total	56,793	100.0%	67,806	100.0%

Distribution of Multifamily Assisted Housing, December 2012, and 2010 ACS Poverty



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Home Mortgage Disclosure Act

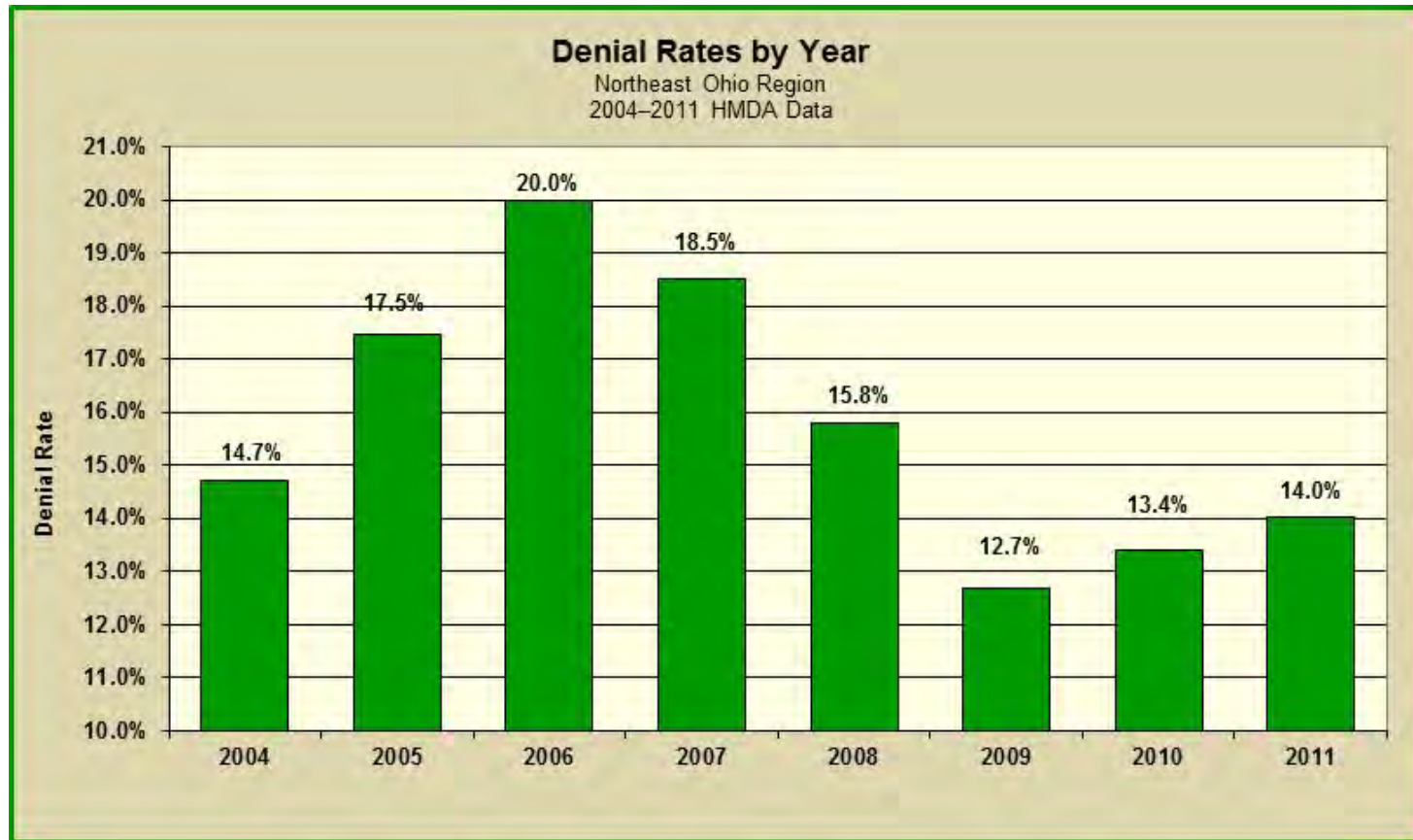
Table 1.1
Purpose of Loan by Year
Northeast Ohio Region
2004–2011 HMDA Data

Purpose	2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	120,239	138,490	131,078	88,407	59,703	55,214	48,614	45,466	687,211
Home Improvement	28,900	33,365	32,417	28,335	20,616	11,992	9,200	9,375	174,200
Refinancing	235,075	226,030	187,953	134,905	90,402	119,405	109,810	96,082	1,199,662
Total	384,214	397,885	351,448	251,647	170,721	186,611	167,624	150,923	2,061,073

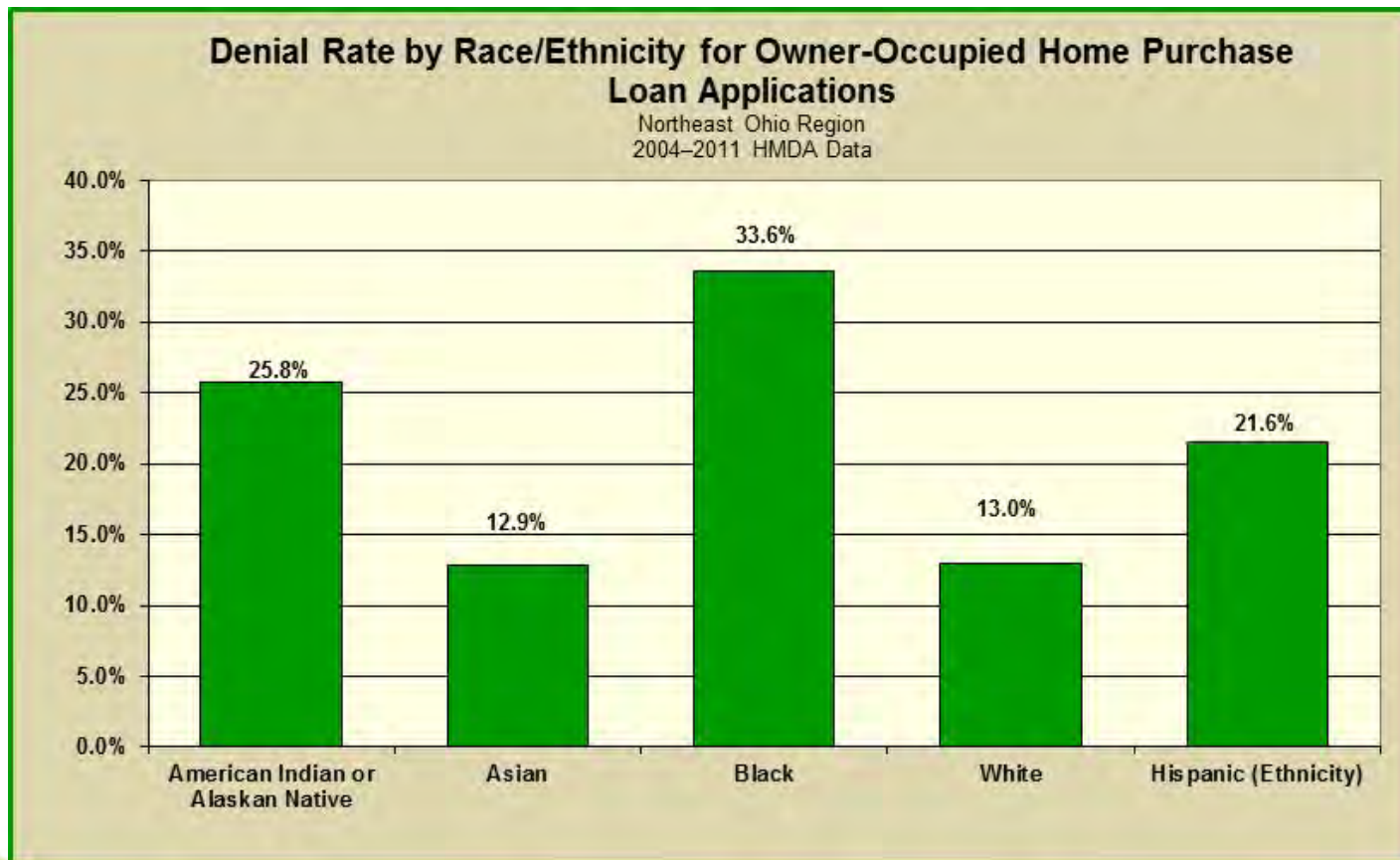
Table 28.1
Purpose of Loan by Year
Medina County
2004–2011 HMDA Data

Purpose	2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	6,264	6,817	6,097	4,866	3,399	3,191	3,139	2,961	36,734
Home Improvement	1,207	1,412	1,235	1,156	852	409	405	469	7,145
Refinancing	10,646	10,699	8,859	6,513	4,675	7,683	7,265	6,268	62,608
Total	18,117	18,928	16,191	12,535	8,926	11,283	10,809	9,698	106,487

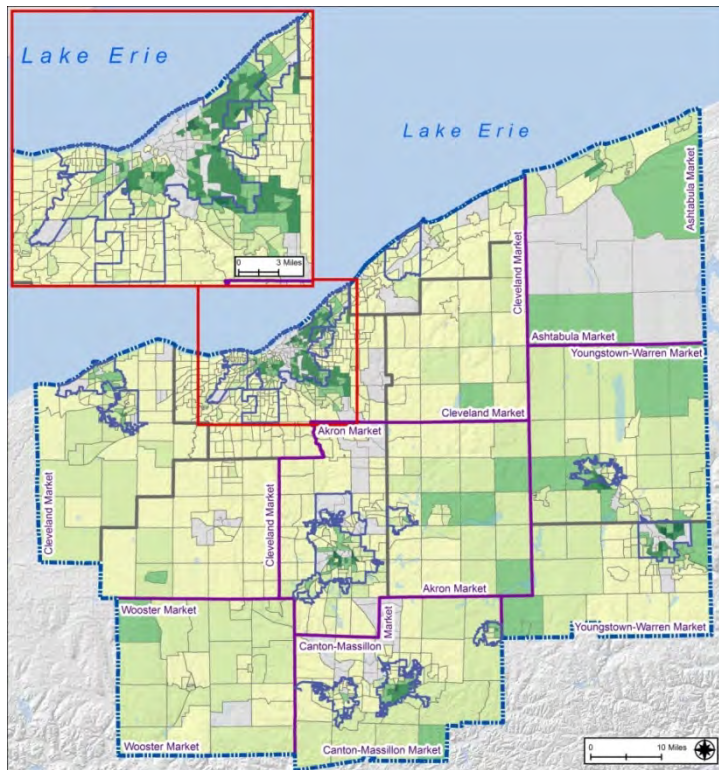
Mortgage Denials by Year



Mortgage Denials by Race/Ethnicity



Home Mortgage Denial Rates



LEGEND

2004-2011 Denial Rate Distribution

2004-2011 Average Denial Rate in the NEOSCC Region = 16.5%

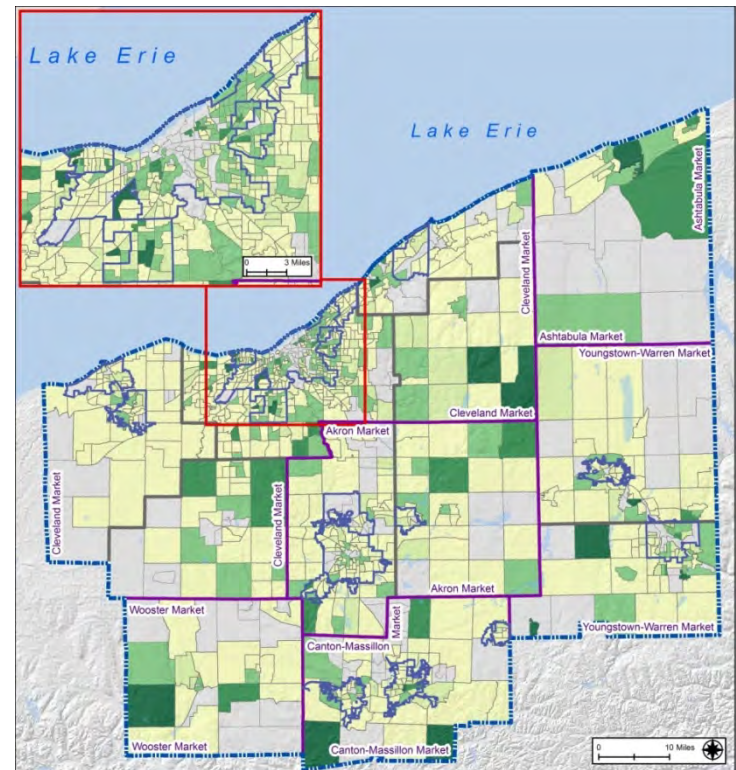
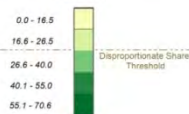
Disproportionate Share Threshold = 26.5% (A disproportionate share exists when the share of a population in a given area is at least 10 percentage points greater than the study area average.)

- Census Tract Boundaries
- Entitlement City Boundaries
- Housing Market Boundaries
- No Loan Applications
- NEOSCC Boundary

NOTE: The Counties of Cuyahoga, Lake, Stark, and Summit are also entitlement areas.

Data Source: FFIEC HMDA, 2004-2011

Denial Rate



LEGEND

2004-2011 Distribution of Denial Rates for Black Applicants

2004-2011 Average Denial Rate for Black Applicants in the NEOSCC Region = 33.6%

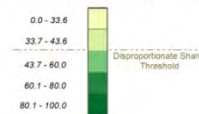
Disproportionate Share Threshold = 43.6% (A disproportionate share exists when the share of a population in a given area is at least 10 percentage points greater than the study area average.)

- Census Tract Boundaries
- Entitlement City Boundaries
- Housing Market Boundaries
- No Loan Applications
- NEOSCC Boundary

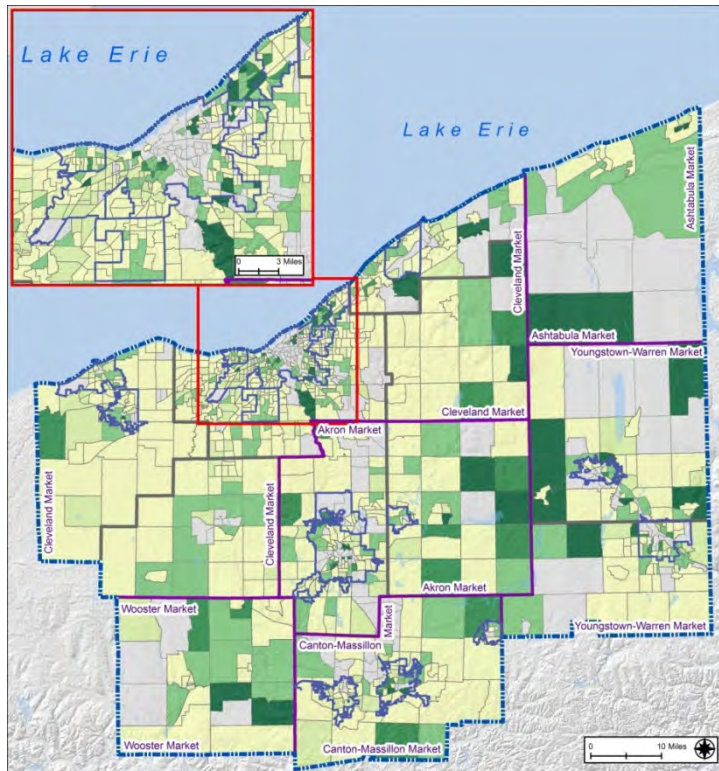
NOTE: The Counties of Cuyahoga, Lake, Stark, and Summit are also entitlement areas.

Data Source: FFIEC HMDA, 2004-2011

Denial Rate for Black Applicants



Hispanic and White Denial Rates



LEGEND

2004–2011 Distribution of Denial Rates for Hispanic Applicants

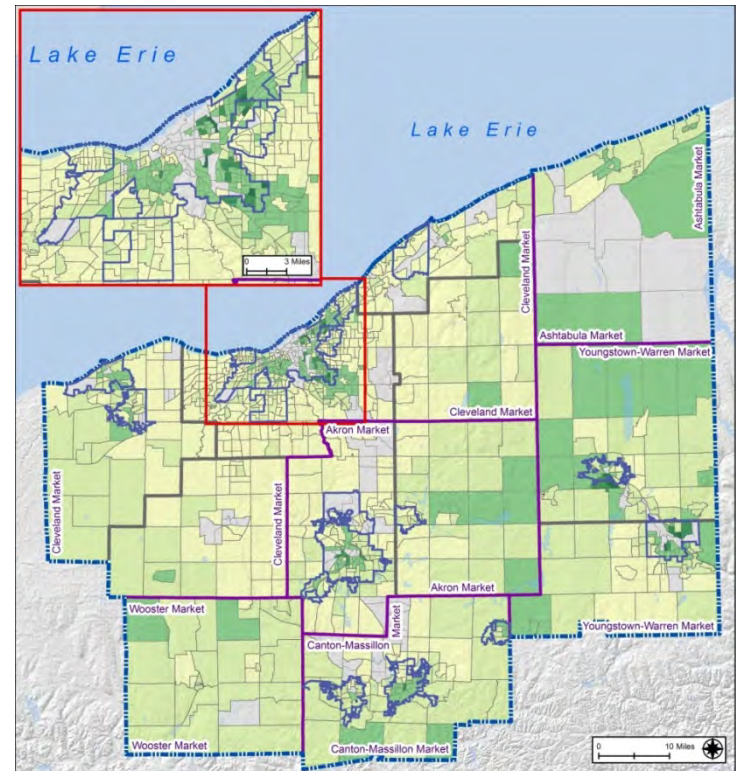
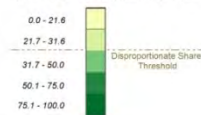
2004–2011 Average Denial Rate for Hispanic Applicants in the NEOSCC Region = 21.6%
Disproportionate Share Threshold = 31.6% (A disproportionate share exists when the share of a population in a given area is at least 10 percentage points greater than the study area average.)

- Census Tract Boundaries
- Entitlement City Boundaries
- Housing Market Boundaries
- No Loan Applications
- NEOSCC Boundary

NOTE: The Counties of Cuyahoga, Lake, Stark, and Summit are also entitlement areas.

Data Source: FFIEC HMDA, 2004–2011

Denial Rate for Hispanic Applicants



LEGEND

2004–2011 Distribution of Denial Rates for White Applicants

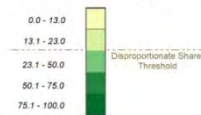
2004–2011 Average Denial Rate for White Applicants in the NEOSCC Region = 13.0%
Disproportionate Share Threshold = 23.0% (A disproportionate share exists when the share of a population in a given area is at least 10 percentage points greater than the study area average.)

- Census Tract Boundaries
- Entitlement City Boundaries
- Housing Market Boundaries
- No Loan Applications
- NEOSCC Boundary

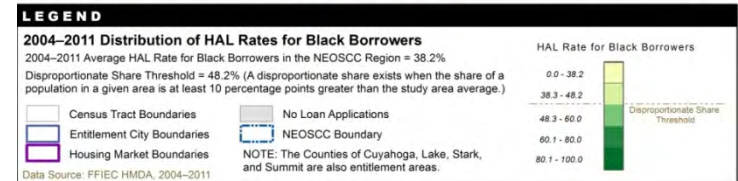
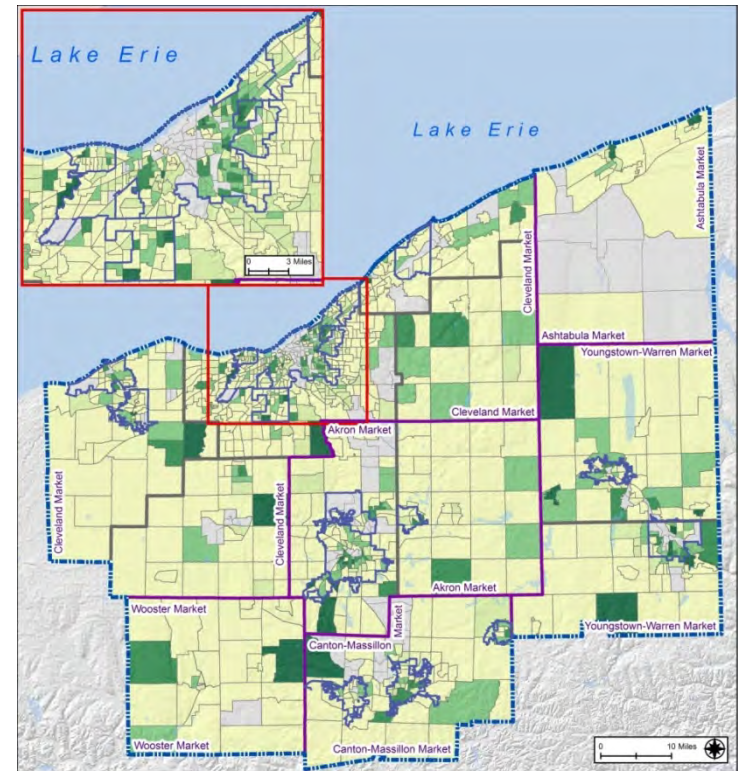
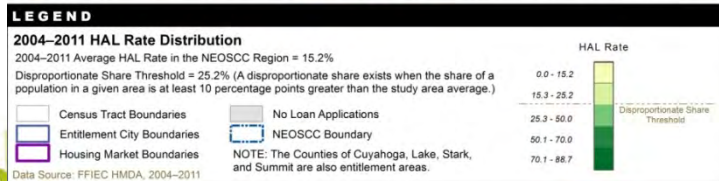
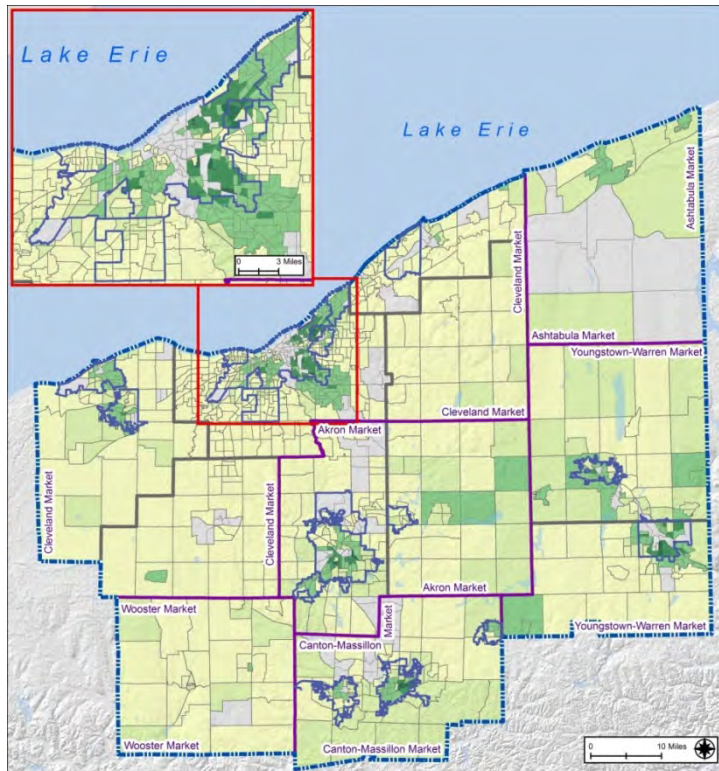
NOTE: The Counties of Cuyahoga, Lake, Stark, and Summit are also entitlement areas.

Data Source: FFIEC HMDA, 2004–2011

Denial Rate for White Applicants



HAL Distribution, Black HALs



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 March 11-15, 2013

NEOSCC

Fair Housing Complaints

Table 28.1
Fair Housing Complaints by Basis
 Medina County
 HUD Data: 1/2004 - 9/2012

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color										
Disability	6	2	9	1	1	3		1		23
Familial Status	3	1	2	1	1	7		2	1	18
National Origin					1					1
Race	2		5		2	2				11
Religion										
Sex	1	2	1			1		1		6
Total Bases	12	5	17	2	5	13		4	1	59
Total Complaints	11	5	14	2	5	12		4	1	54

Fair Housing Complaints

Table 28.3
Fair Housing Complaints by Issue
Medina County
HUD Data: 1/2004 - 9/2012

Issue	Total
Discriminatory refusal to rent	13
Discrimination in term, conditions or privileges relating to rental	12
Failure to make reasonable accommodation	8
Discriminatory acts under Section 818 (coercion, etc.)	7
Discriminatory advertisement - rental	5
Discriminatory terms, conditions, privileges, or services and facilities	5
Discriminatory advertising, statements and notices	3
Non-compliance with design and construction requirements (handicap)	3
All Other	13
Total Issues	69
Total Complaints	54

Fair Housing Complaints

Table 28.6
Fair Housing Complaints by Basis
 Medina County
 OCRC Data: 5/2004 - 9/2012

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Age										
Ancestry										
Color	1									1
Disability	8	3	9			2	1	1		24
Familial Status	3	1		1	1	1	5	3	3	18
Gender	1	2	1			2	2	2		10
National Origin	1				1					2
Race	3		5		3					16
Religion							1			1
Retaliation	2	1	1			1				5
Other Basis		1								1
Total Bases	19	8	16	1	7	9	9	6	3	78
Total Complaints	16	7	14	1	6	7	6	4	3	64

Fair Housing Complaints

Table 28.7
Fair Housing Complaints by Issue
 Medina County
 OCRC Data: 5/2004 - 9/2012

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Advertising	2						5	1	3	11
Constructive Discharge										
Demotion										
Discharge										
Exclusion	3	2	1	1	2	2				11
Harassment			1			2				3
Intimidation		1	3							4
Maternity										
Other	11	2	8		1	3	2	2		29
Reasonable Accommodation	2		3		1	1		1		8
Recall										
Sexual Harassment		2								2
Terms and Conditions	4	5	5		2	1		1		18
Testing										
Total Issues	22	12	21	1	6	9	7	5	3	86
Total Complaints	16	7	14	1	6	7	6	4	3	64

Fair Housing Complaints

Table 28.9
Fair Housing Complaints by Basis
 Medina County
 FHC Data: 3/2004 - 9/2012

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Advertising										
Age										
Ancestry										
Color										
Criminal Background										
Disability	2		7	2	1	1		1		14
Familial Status							3	2		5
Harassment										
National Origin			2				1			3
Race			3				1			4
Retaliation	1									1
Sex							2	2		4
Other										
None										
Unknown										
Total Basis	3	0	12	2	1	1	7	5	0	31
Total Complaints	3		12	2	1	1	3	3		25

2012-13 Local Government Survey

Preliminary Findings From Gov't Survey

- ☐ **60% have occupancy standards or limits**
- ☐ **55% have definition of family**
- ☐ **80% define “dwelling unit” or “residential unit”**
- ☐ **Less than ½ had definition or provisions for “disability”; less than 20% for small cities**
- ☐ **57% indicated potential barriers for development of affordable housing**
- ☐ **25% lack fair housing ordinance, policy, regulation, or code chapter, 40% small cities**
- ☐ **84% have some AFFH practices, 35% small cities**

2012-13 Housing Stakeholder Survey

Preliminary Findings

<https://www.research.net/s/NEOSCCfairhousingsurvey>

How Familiar are you with Fair Housing Laws?	
Northeast Ohio Region	
2012 - 2013 Housing Stakeholder Survey	
Familiarity with Fair Housing Laws	% of Total
Not Familiar	8.0%
Somewhat Familiar	27.5%
Very Familiar	37.7%
Missing	26.8%
Total	100.0%

2012-13 Housing Stakeholder Survey

Preliminary Findings

Federal, State and Local Fair Housing Laws	
Northeast Ohio Region	
2012-2013 Housing Stakeholder Survey	
Question	% Agree
Do you think fair housing law s are useful?	92.1%
Are fair housing law s difficult to understand or follow ?	34.5%
Do you think fair housing law s should be changed?	31.3%
Do you thing fair housing law s are adequately enforced?	76.6%

2012-13 Housing Stakeholder Survey

Preliminary Findings

Barriers to Fair Housing in the Private Sector	
Northeast Ohio Region	
2012 - 2013 Housing Stakeholder Survey	
Question	% Agree
Are you aware of any questionable practices or barriers to fair housing choice in:	
The rental housing market?	37.0%
The mortgage and home lending industry?	27.1%
The real estate industry?	21.5%
The housing construction or accessible housing design fields?	24.6%
The home insurance industry?	20.8%
The home appraisal industry?	19.6%
Any other housing services?	10.6%

2012-13 Housing Stakeholder Survey

Preliminary Findings

Barriers to Fair Housing in the Public Sector Northeast Ohio Region 2012 - 2013 Housing Stakeholder Survey	
Question	% Agree
Are you aware of any questionable practices or barriers to fair housing choice in:	
Limited access to government services, such as employment services?	33.3%
Zoning laws?	33.3%
Land use policies?	24.6%
Neighborhood or community development policies?	27.3%
Occupancy standards or health and safety codes?	21.2%
Property tax policies?	20.0%
Housing construction standards?	16.3%
Permitting process?	15.9%
Public administrative actions or regulations?	14.0%

2012-13 Housing Stakeholder Survey

Preliminary Findings

Fair Housing Activities Northeast Ohio Region 2012 - 2013 Housing Stakeholder Survey	
Testing and education	% Too Little
Is there sufficient outreach and education activity?	48.3%
Is there sufficient testing?	16.7%

NEOSCC Regional AI

Regional Analysis of Impediments To Fair Housing Choice

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Regional AI Fair Housing Forums
March 11-15, 2013



Vibrant NEO 2040 Project Schedule

February				March				April					May				June			
2/4	2/11	2/18	2/25	3/4	3/11	3/18	3/25	4/1	4/8	4/15	4/22	4/29	5/6	5/13	5/20	5/27	6/3	6/10	6/17	6/24
Business as Usual Scenario and Fiscal Model Development				 Fair Housing Forums				Business As Usual Public Work Shops					 On-Line Tool				Alternative Scenario Development			
Regional Analysis of Impediments to Fair Housing Choice																	 Regional AI Public Reviews			

July					August				September					October			
07/01	07/08	07/15	07/22	07/29	08/05	08/12	08/19	08/26	09/02	09/09	09/16	09/23	09/30	10/07	10/14	10/21	10/28
Alternative Scenarios Public Workshops					Preferred Scenario Development				Preferred Scenario Workshops					Final Report Submission			
Regional Analysis of Impediments to Fair Housing Choice Final Report														Final Report Presentation to NEOSCC Board and Public			

November				December				
11/4	11/11	11/18	11/25	12/2	12/9	12/16	12/23	12/30
				Final Implementation Framework				
								

Scenario Planning

SET THE COURSE FOR NEO'S FUTURE

This year, you have the opportunity to help create a new, shared vision for a more vibrant, resilient and sustainable Northeast Ohio. The first opportunity is almost here – so *save the date!*



The VibrantNEO process will look at the future of Northeast Ohio through a series of public workshops and online tools. What will it look like in 2040 if we keep doing what we're doing? What are the potential outcomes if we do things differently? **We can only answer these questions together.**



Regional AI Fair Housing Forums
March 11-15, 2013

NEOSCC

SAVE THE DATE!

ADD YOUR VOICE TO HELP MAKE NEO MORE VIBRANT

Pick a date and location that's most convenient for you

April 30:

Oberlin (Lorain, Medina, and western Cuyahoga)
Warren (Mahoning, Trumbull and Ashtabula)

May 1:

Cleveland (Central Cuyahoga and inner-ring suburbs)
Canton (Wayne and Stark)

May 2:

Akron (Summit and Portage)
Warrensville Hts. (Lake, eastern Cuyahoga and Geauga)

NEOSCC

VibrantNEO 2040 is an initiative of the Northeast Ohio Sustainable Communities Consortium.

VIBRANTNEO

VIBRANT
NEO 2040



Regional AI Fair Housing Forums
March 11-15, 2013

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