

Regional Analysis of Impediments to Fair Housing Choice

Draft Report Presentations

Cuyahoga County



Regional AI Draft Report Presentations
June 18-20, 2013



REGIONAL AI PRESENTATIONS - 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**



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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.

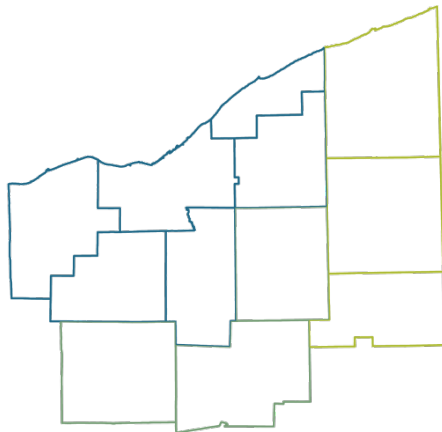
THE NORTHEAST OHIO SUSTAINABLE COMMUNITIES CONSORTIUM (NEOSCC) IS A 33-MEMBER CONSORTIUM OF METROPOLITAN PLANNING AGENCIES, MUNICIPAL AND COUNTY GOVERNMENTS, GOVERNMENT AGENCIES AND NON-PROFITS .



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What is Vibrant NEO 2040?



*A regional visioning
and decision-making
framework for
Northeast Ohio*

**Creating a more vibrant, resilient, and
sustainable region**



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What is Vibrant NEO 2040?

**Four action products to
turn our vision into reality**



DASHBOARD

Measuring progress and inspiring us toward our goals.



POLICY RECOMMENDATIONS

Supporting and advancing our vision and goals.



TOOL KIT & BEST PRACTICES

Implementing and sustaining the vision across the region.



PILOT PROGRAMS

Proving and highlighting our vision and goals.



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Why Conduct a Regional AI?

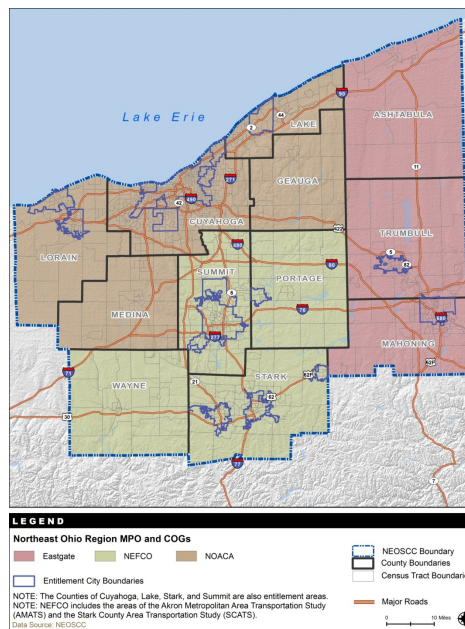
- Results of Fair Housing Study will be integrated into the Vibrant NEO Scenario Planning Process.
- This study can also be used at a local level by entitlement communities as their own Analysis of Impediments to Fair Housing Choice.



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NEOSCC Region:
Three Regional Governments, Six Housing Markets, 12 Counties,
18 Entitlement cities
4 Entitlement counties
8 more non-entitled county areas



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NEOSCC Regional AI Public Review

- **Public Review Period: June 10-July 9**
- **Public Presentations June 18-20:**
 - ✓ **June 18: Mahoning, Trumbull, Lake/Geauga, and Ashtabula Counties**
 - ✓ **June 19: Portage, Summit, Medina, Stark/Wayne Counties**
 - ✓ **June 20: Lorain and Cuyahoga Counties**



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**Single Jurisdiction -
Analysis of Impediments (AI)
Entitlement jurisdictions must:**

**Certify that they are affirmatively
furthering fair housing (AFFH) as a
condition of receiving CPD funds from
HUD (funds received for the last 20 years)**

There are 22 such jurisdictions in NE Ohio



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**Any Jurisdiction's
Analysis of Impediments (AI)**

Certification means three things:

- 1. Conduct an AI**
- 2. Take action on impediments if
impediments are found**
- 3. Maintain records of actions**



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Definition of Impediments to Fair Housing Choice:

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



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Analysis of Impediments (AI)

- **Private sector transactions: rental market (applications, interviews, etc) and sales markets (lending, steering, blockbusting, foreclosure burden, etc)**
- **Public sector influences: land use codes, zoning, public policy practices, neighborhood resistance, etc .**
- **Assessing barriers to housing choice**



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HUD Secretary Shaun Donovan

- **January 2012, urged Sustainable Community Initiative Grantees to produce a single Regional AI**
- **Blend requirements of CPD Analysis of Impediments requirements with SCI Fair Housing and Equity Assessment**
- **Receive draft Regional AI Checklist on April 10, 2013**



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Fair Housing Equity Assessment

Required of Sustainable Communities Grantees

1. **Demographic and FH background**
2. **Segregation/Integration**
3. **Concentrations of poverty**
4. **Disparity in access to opportunity**
5. **Fair housing infrastructure**
6. **Physical infrastructure**



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NEOSCC Regional AI

- **Identifying racially and ethnically concentrated areas of poverty**
- **Measuring racial & ethnic isolation as well as segregation in the Region**
- **Evaluating access to opportunity**
- **Reduce social and economic disparities**
- **Identify impediments and recommend actions to overcome impediments**



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Methodology, Research Actions And Findings:

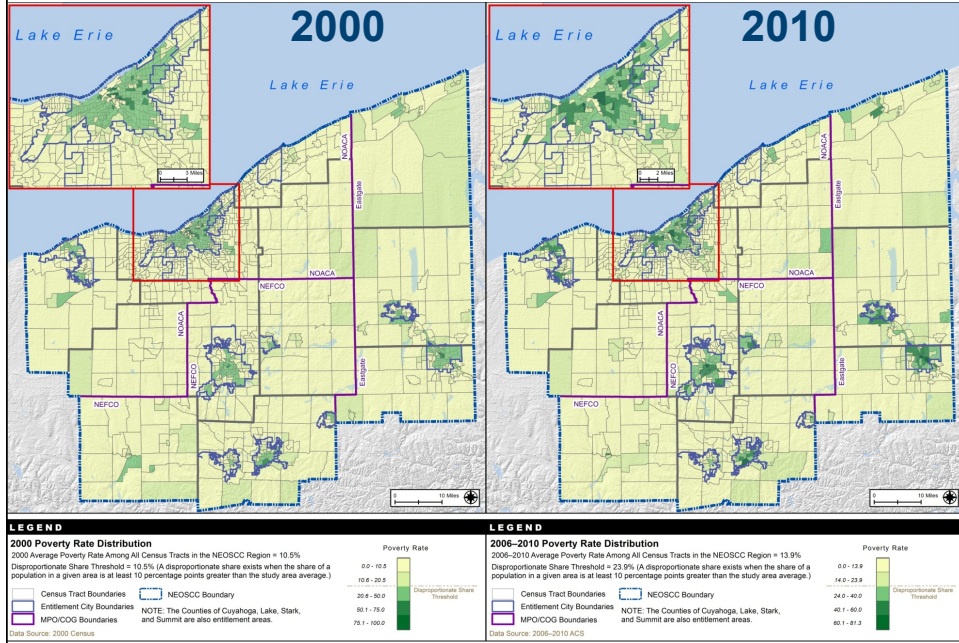
- **Implemented surveys**
- **Conducted research and collected data**
- **Conducted qualitative analysis**
- **Conducted quantitative analysis**
- **Drafted three volume set of reports**
- **Now providing opportunity to comment upon findings and recommendations**



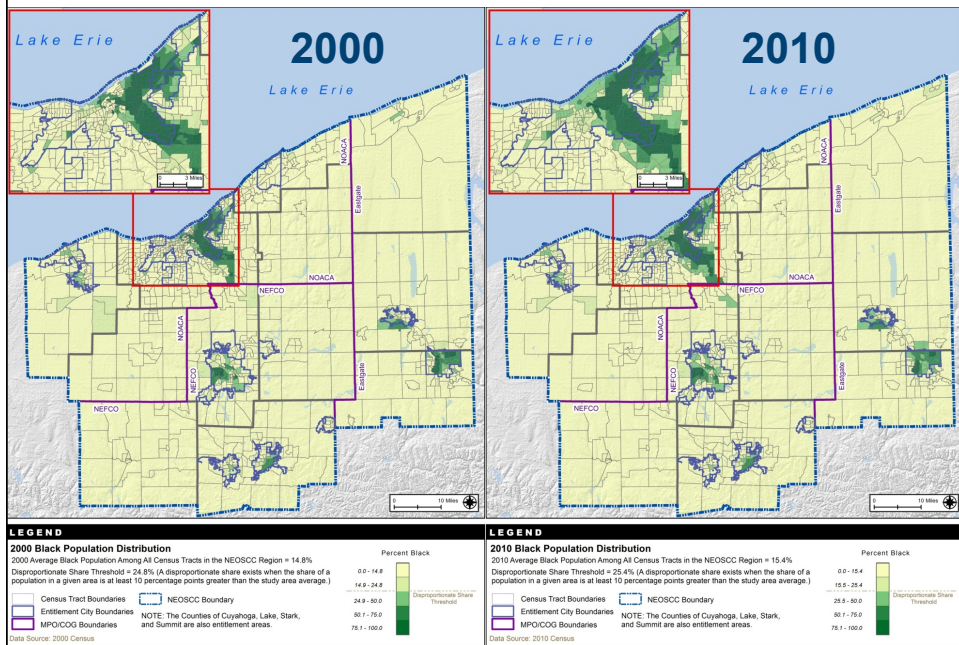
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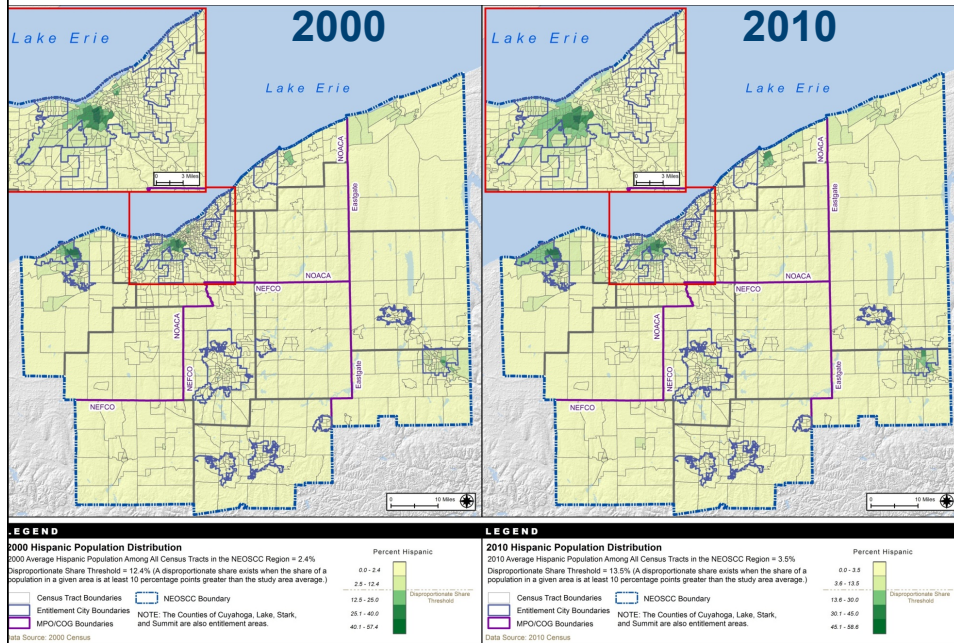
Spatial Distribution of Poverty



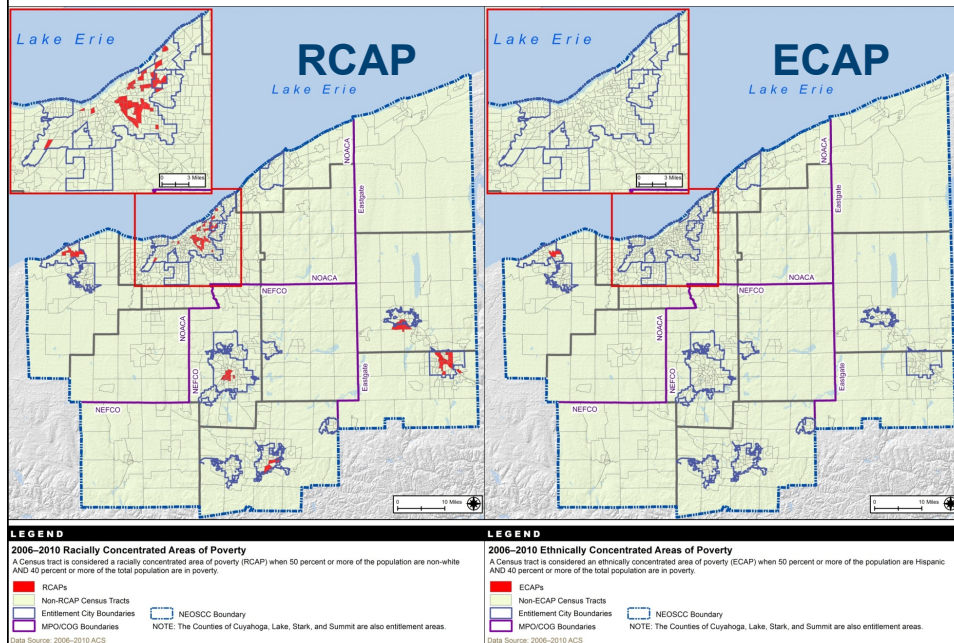
Spatial Distribution of Blacks



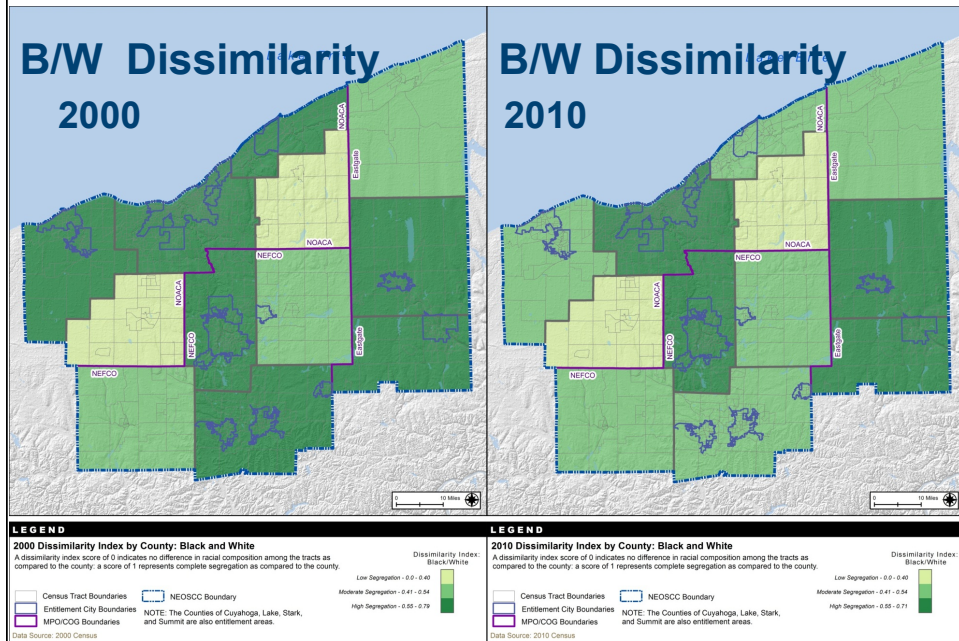
Spatial Distribution of Hispanics



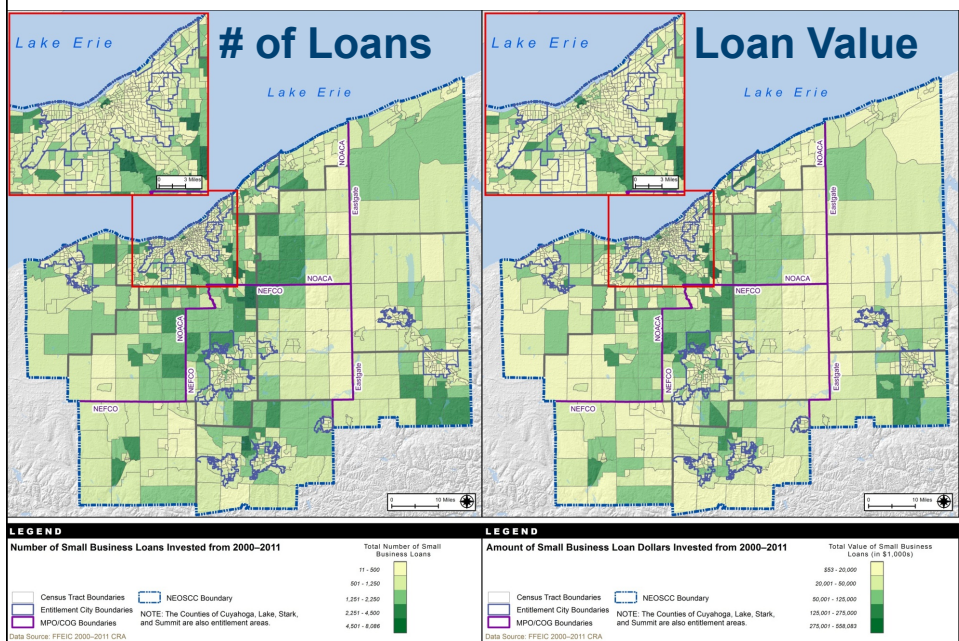
Concentrations of Poverty

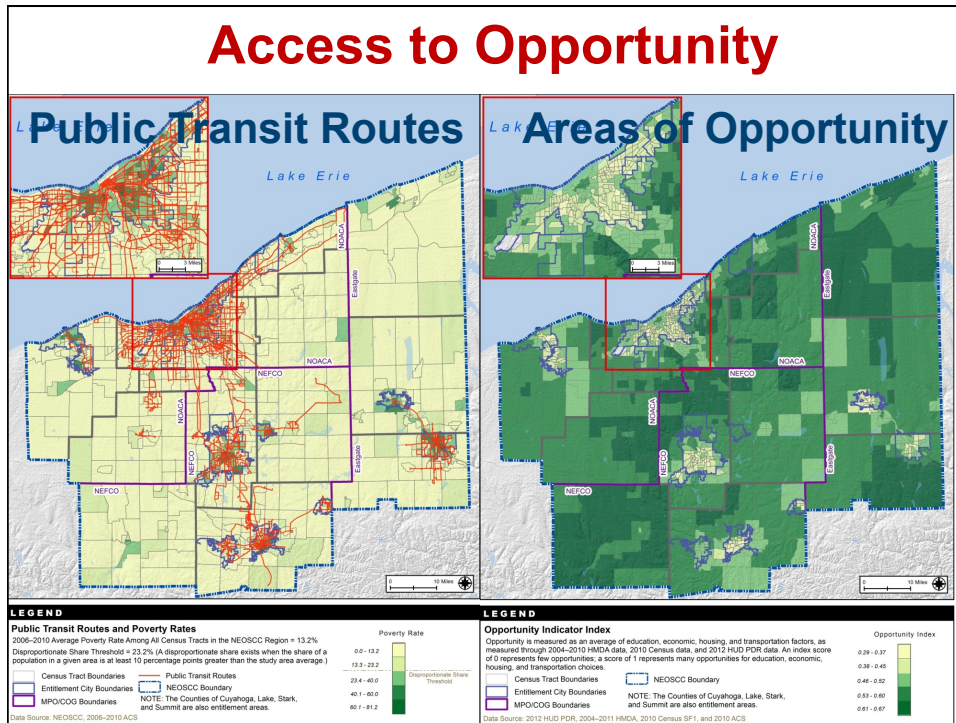


Indexes of Segregation



Small Business Lending



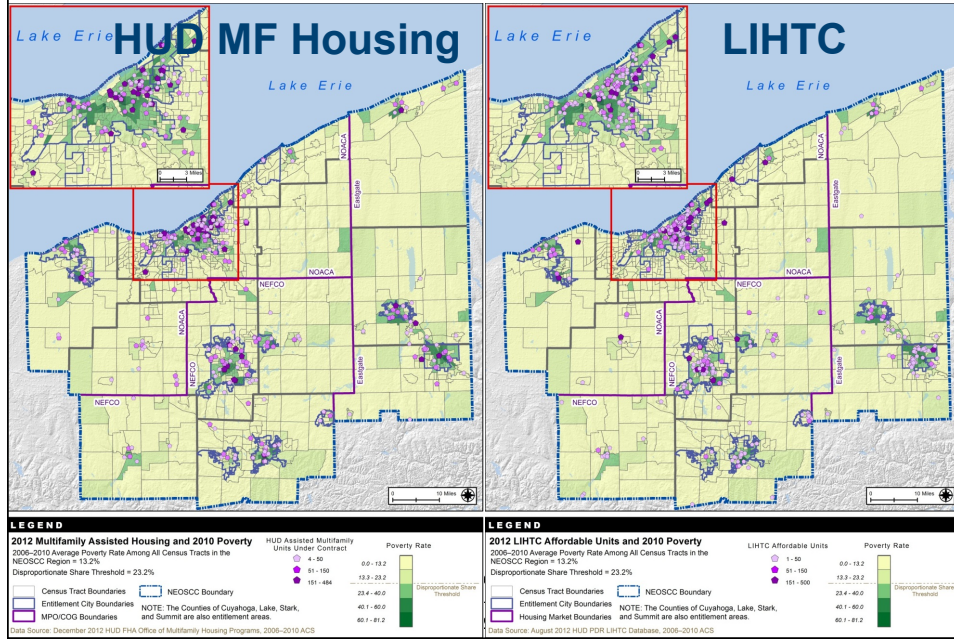


FHEA Summary:

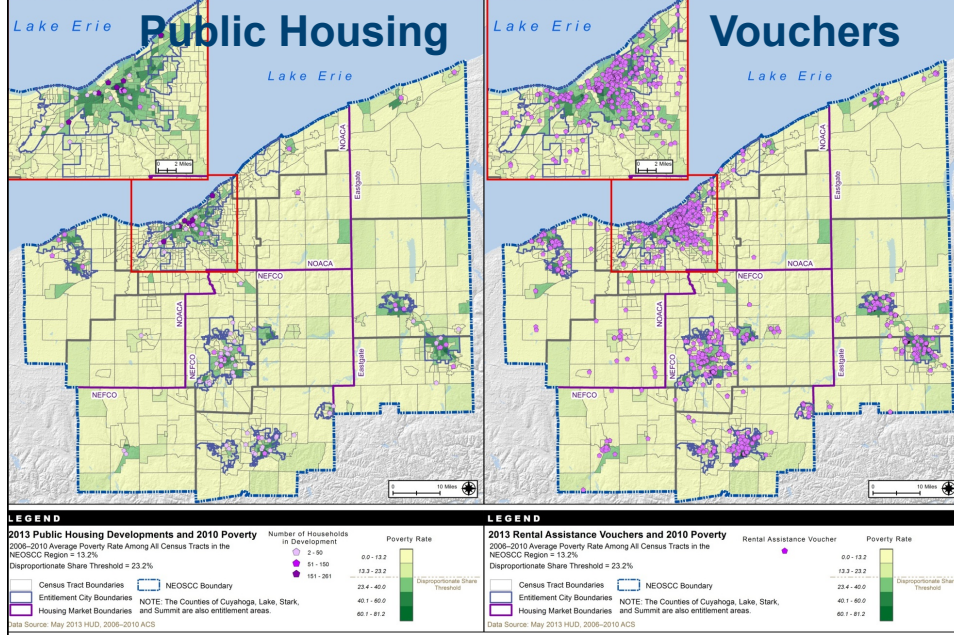
- Concentrations of racial/ethnic minorities
- Areas with significant poverty
- Areas with high levels of segregation
- Areas that have lacked investment
- Opportunity areas outside of urbanized communities
- Call for public investments that enhance access to areas of opportunity



Spatial Location of Housing



Spatial Location of Housing



Fair Housing Complaints By Basis of the Complaint

Fair Housing Complaints by Basis

Cuyahoga County
2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color	1	3		2	1	1			1	9
Disability	27	29	35	19	33	21	29	23	17	233
Family Status	5	11	17	16	20	69	38	54	29	259
National Origin	2	6	8	9	33	11	20	5	1	95
Race	30	32	35	40	71	47	38	16	12	321
Religion	2	5	2	3	10		2	2	1	27
Sex	3	2	7	12	7	17	20	5	7	80
Total Bases	70	88	104	101	175	166	147	105	68	1,024
Total Complaints	59	81	83	77	130	152	135	95	61	873



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Fair Housing Complaints

Fair Housing Complaints by Issue

Cuyahoga County
2004–2012 HUD Data

Issue	Total
Discrimination in terms, conditions or privileges relating to rental	182
Discriminatory refusal to rent	174
Discriminatory advertisement - rental	137
Discriminatory terms, conditions, privileges, or services and facilities	123
Failure to make reasonable accommodation	109
Discriminatory advertising, statements, and notices	105
Discriminatory acts under Section 818 (coercion, etc.)	65
Discriminatory refusal to rent and negotiate for rental	41
Other discriminatory acts	27
Otherwise deny or make housing available	19
Discrimination in services and facilities relating to rental	16
False denial or representation of availability - rental	15
Discriminatory financing (includes real estate transactions)	15
Discrimination in making of loans	11
Discriminatory refusal to negotiate for rental	10
All Other	81
Total Issues	1,130
Total Complaints	873



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Home Mortgage Disclosure Act

Denial Rates by Race/Ethnicity of Applicant Cuyahoga County 2004–2011 HMDA Data	
Race/Ethnicity	Average
American Indian	26.0%
Asian	12.1%
Black	35.4%
White	11.8%
Average	19.0%
Non-Hispanic	17.6%
Hispanic	21.5%



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Home Mortgage Disclosure Act

Rate of HALs Originated by Race/Ethnicity of Applicant Cuyahoga County 2004–2011 HMDA Data	
Race/Ethnicity	Average
American Indian	19.8%
Asian	6.0%
Black	39.6%
White	10.3%
Average	16.8%
Non-Hispanic	15.8%
Hispanic	19.1%



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2012-13 Local Government Survey

Cuyahoga County Results

- Half have occupancy standards or limits
- All have definition of family
- Most define “dwelling unit” or “residential unit”, a couple don’t know
- Four define “disability”, eight do not; some don’t know
- A few indicated potential barriers for development of affordable or mixed use housing
- Most have fair housing ordinance, policy, regulation, or code chapter, almost half of respondents don’t know
- Most have some AFFH practices, though not all



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2012-13 Housing Stakeholder Survey

Findings

Primary Role of Respondent
2012–2013 Fair Housing Survey for Housing Stakeholders

Primary Role	Total
Advocate/Service Provider	43
Local Government	26
Real Estate	25
Construction/Development	13
Property Management	11
Condo or Homeowner Association Leader	5
Law/Legal Services	5
Resident Advisory Council Leader	5
Banking/Finance	2
Insurance	1
Other Role	29
Total	165

Regional AI – Cuyahoga County

Identified Impediments:

Private Sector Impediments

- 1. Denial of available housing in the rental markets**
- 2. Discriminatory terms, conditions, privileges, or facilities relating to rental**
- 3. Failure to make reasonable accommodations or modifications**
- 4. Steering activities in the rental markets**
- 5. Preferences stated in advertisements for rental housing**
- 6. Denial of availability of housing in the home purchase markets**



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Regional AI – Cuyahoga County

Identified Impediments:

Private Sector Impediments

- 7. Steering activities in home sales markets**
- 8. Denial of home purchase loans**
- 9. Predatory lending in the home purchase market**
- 10. Failure to comply with accessibility requirements in construction of housing units**
- 11. Inequitable investment of Community Reinvestment Act resources**



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Regional AI – Cuyahoga County

Identified Impediments:

Public Sector Impediments

1. Failure to have sufficient fair housing policies or practices by some units of local government
2. Ineffective fair housing outreach and education efforts
3. Land use and planning decisions and operational practices resulting in unequal access to government services such as transportation
4. Historical establishment of policies and practices resulting in segregation of minority populations



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Regional AI – Cuyahoga County

Identified Impediments:

Public Sector Impediments

5. Decisions regarding definitions of “family,” “dwelling unit,” and related terms are problematic
6. Implementation of exclusionary policies



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NEOSCC Regional AI

Regional Analysis of Impediments To Fair Housing Choice

Send comments to:

Northeast Ohio Sustainable Communities Consortium
146 S. High Street, Akron OH 44308

or
info@neoscc.org



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Creating NEO'S Future Depends On You!

3 Rounds of Workshops

Vibrant NEO 2040 will hold three rounds of multiple evening workshops across the region to make it convenient for you to attend. To see the workshop schedule broken out by location and find out more, visit VibrantNEO.org/WorkShops.

1 Apr 30 - May 2
Business-As-Usual
Scenario
Public Workshops

2 Jul 29 - Aug 2
Alternative
Scenario
Public Workshops

3 Sep 16 - Sep 20
Preferred
Scenario
Public Workshops

Fall 2013
Public Presentation
of Final Report

PLAY Imagine MyNEO!

Beginning in June, you can show us the choices you would make about NEO's future by playing *Imagine MyNEO* at VibrantNEO.org/Imagine





Vibrantneo.org/imagine



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