Regional Analysis of Impediments to Fair Housing Choice

Draft Report Presentations

Summit County

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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.
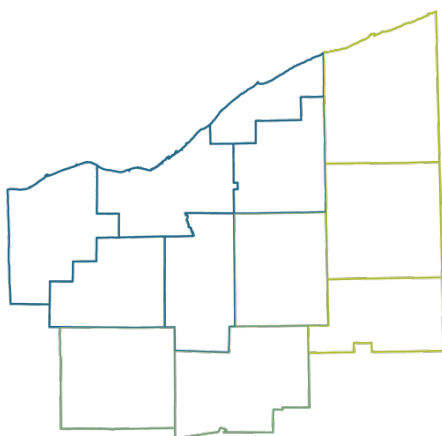
Result: $4.25M federal grant.

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.
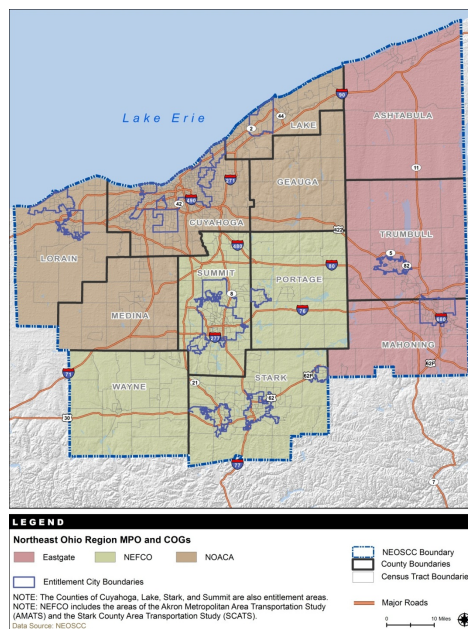
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NEOSCC Region:
Three Regional Governments, Six Housing Markets, 12 Counties,

18 Entitlement cities
4 Entitlement counties
8 more non-entitled county areas

LEGEND
Northeast Ohio Region MPO and COGs
Eastgate   NEFCO   NOACA

NEOSCC Boundary
County Boundaries
Census Tract Boundaries

Entitlement City Boundaries

NOTE: The Counties of Cuyahoga, Lake, Stark, and Summit are also entitlement areas.
NOTE: NEFCO includes the areas of the Akron Metropolitan Area Transportation Study
(AMATS) and the Stark County Area Transportation Study (SCATS).
Data Source: NEOSCC

Major Roads

0   10 Miles

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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

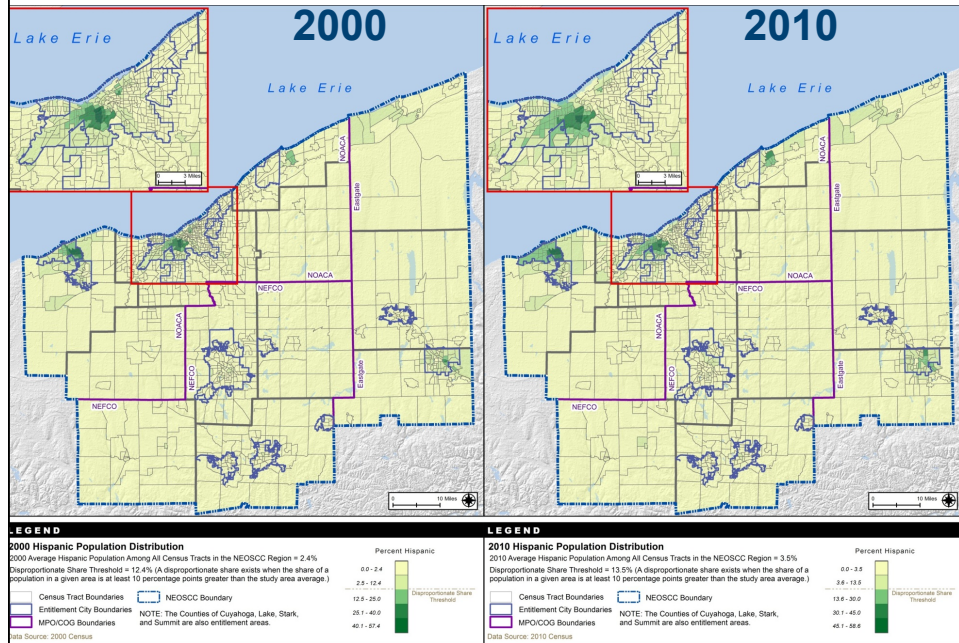Regional AI Draft Report Presentations
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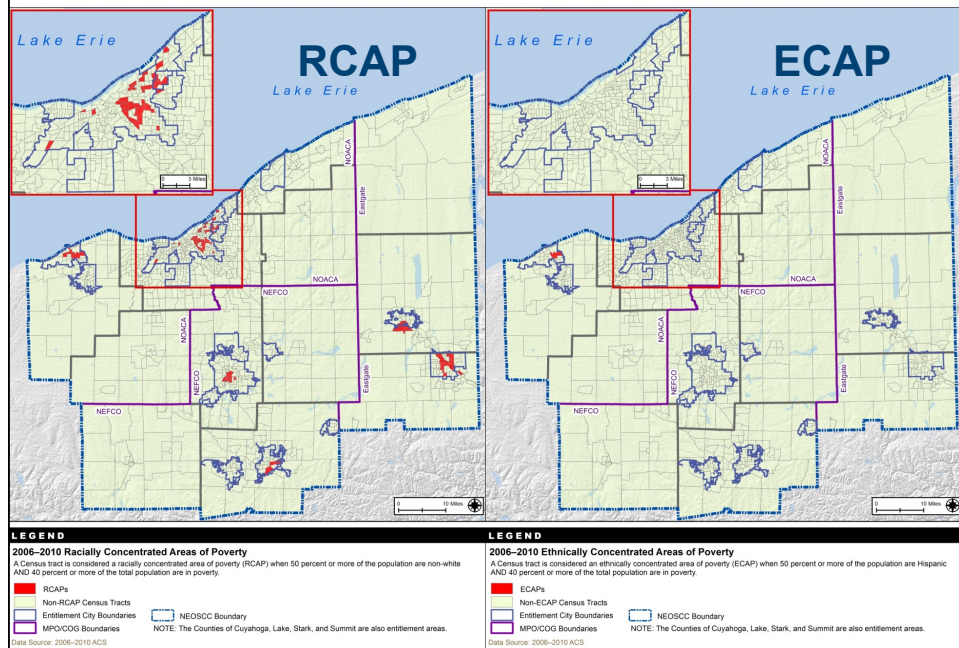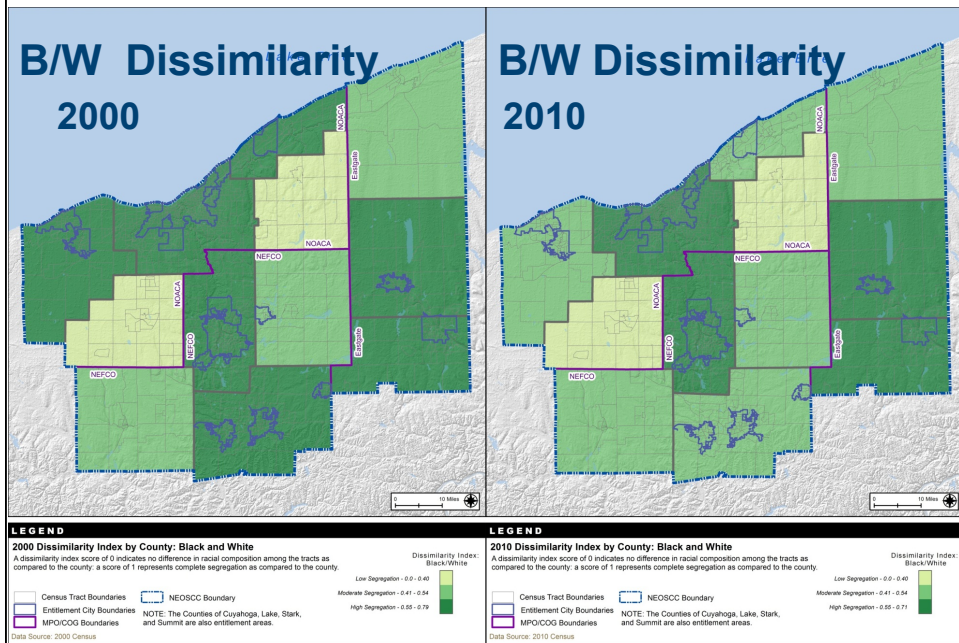Spatial Distribution of Poverty
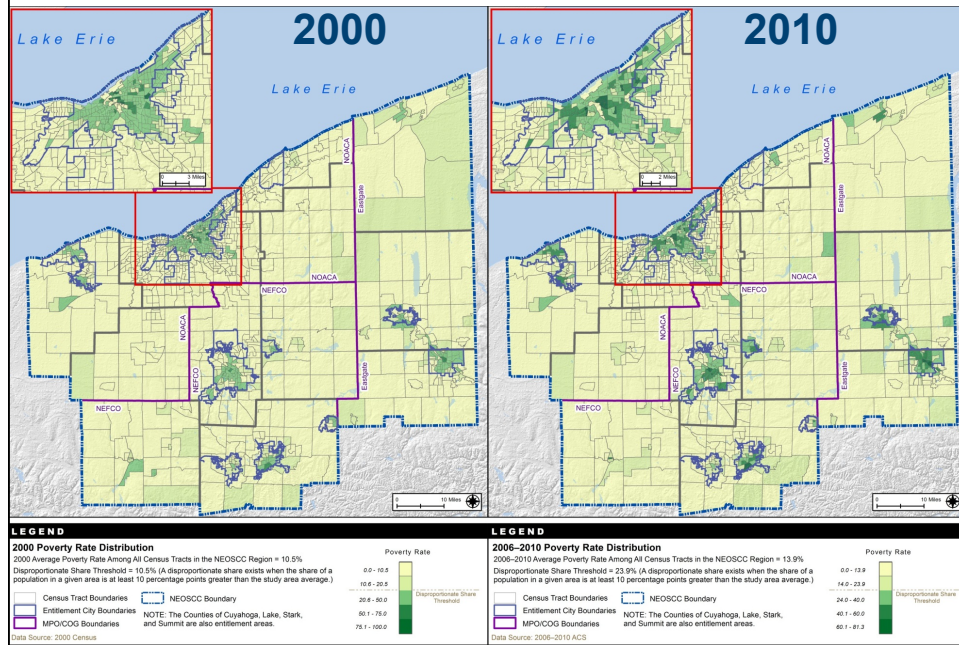
Spatial Distribution of Blacks
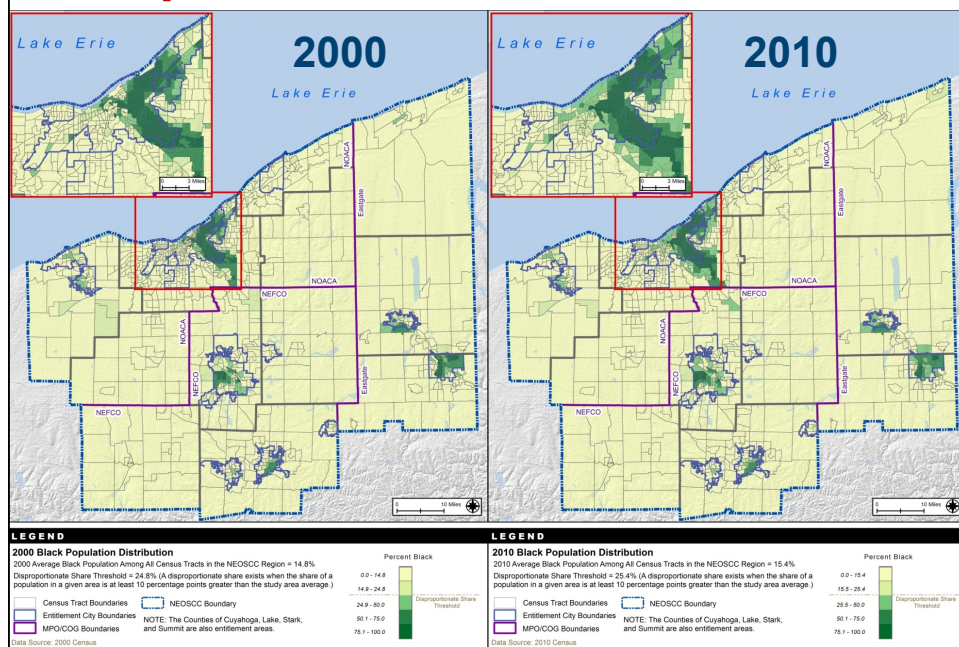
Spatial Distribution of Hispanics

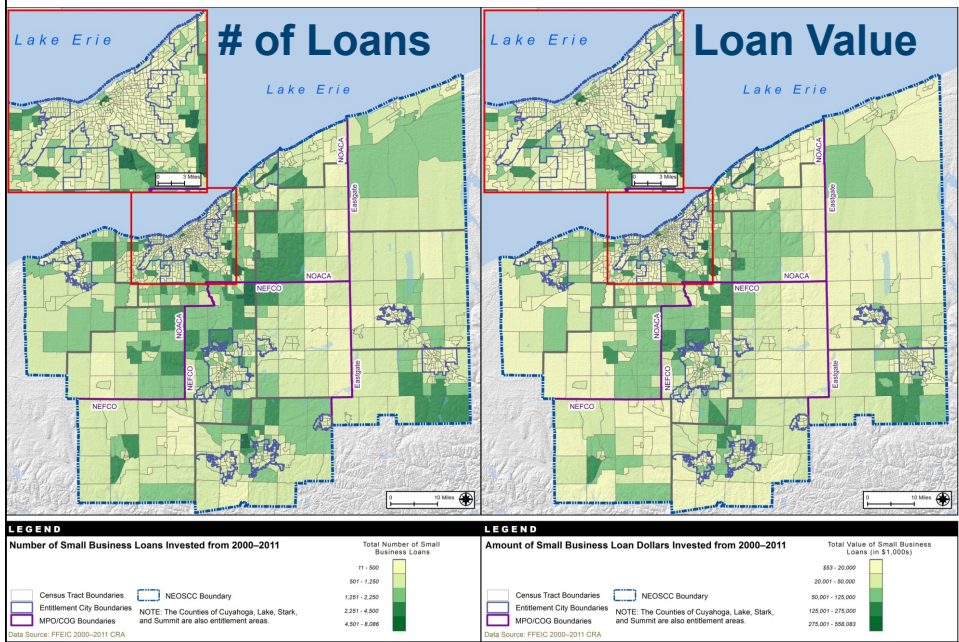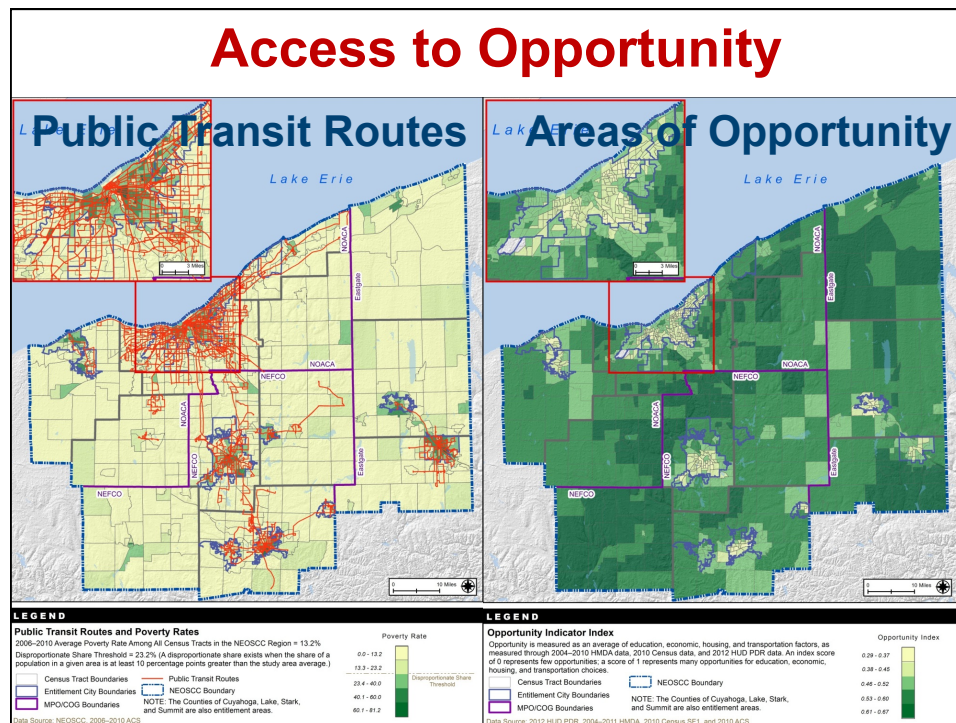Concentrations of Poverty

Indexes of Segregation — B/W Dissimilarity 2000 and B/W Dissimilarity 2010

Small Business Lending — # of Loans and Loan Value

Access to Opportunity

Public Transit Routes   **Areas of Opportunity**

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**

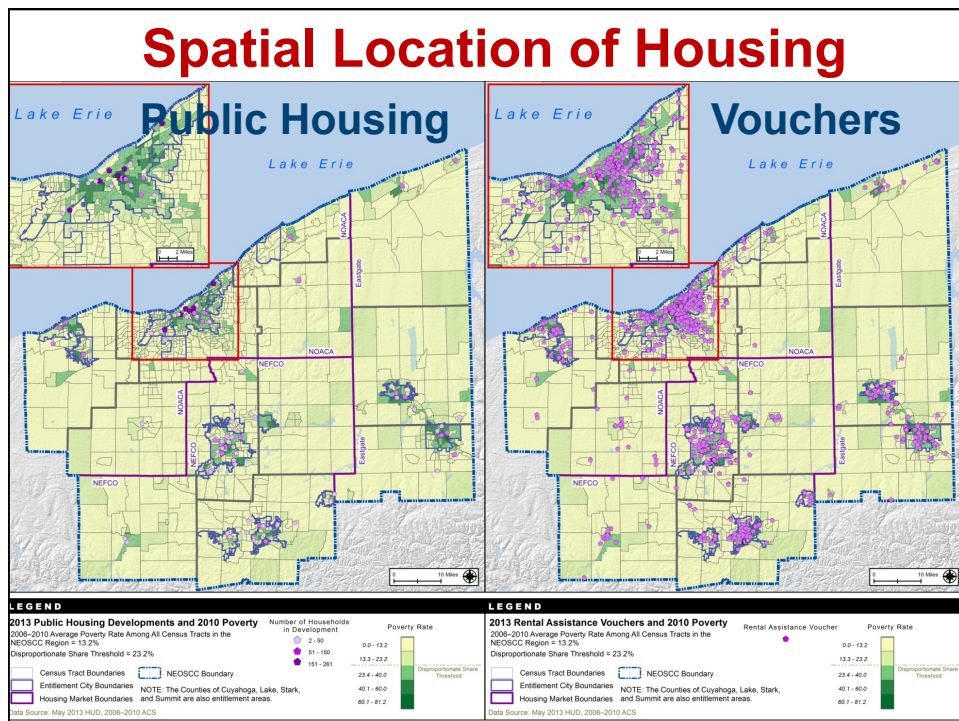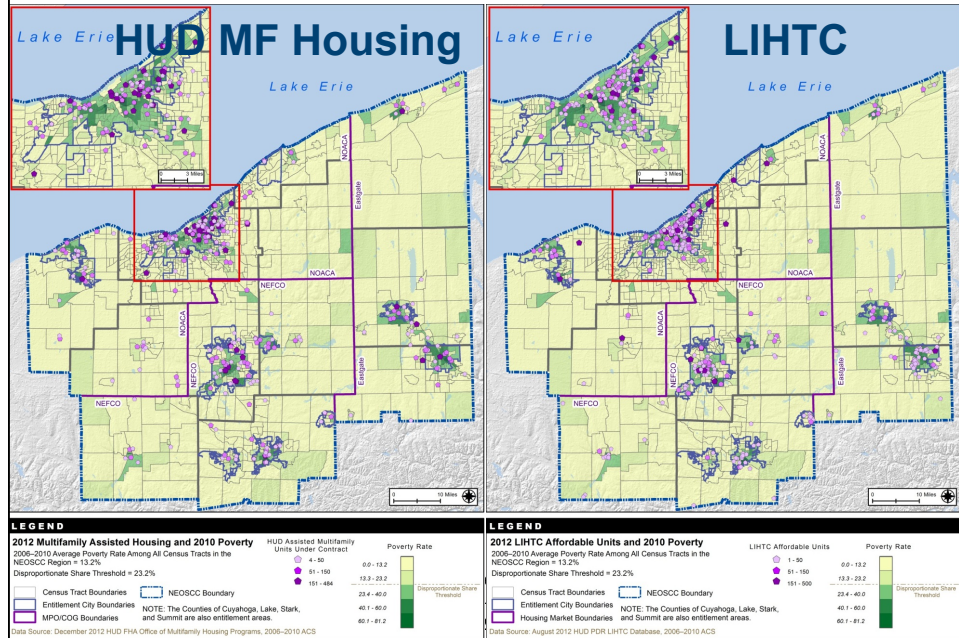➢ **Call for public investments that enhance access to areas of opportunity**

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Spatial Location of Housing — HUD MF Housing / LIHTC

Spatial Location of Housing — Public Housing / Vouchers

Fair Housing Complaints
By Basis of the Complaint

Fair Housing Complaints by Basis
Summit County
2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color	1		1	1	11	5	1		1	21
Disability	48	38	37	29	24	33	35	33	15	292
Family Status	18	7	11	13	9	36	25	26	3	148
National Origin	2		2	1	2	2	2	1	1	13
Race	43	15	32	15	21	22	10	20	10	188
Religion	1	1			1	1	3			7
Sex	11	16	13	4	10	13	10	3	8	88
Total Bases	**124**	**77**	**96**	**63**	**78**	**112**	**86**	**83**	**38**	**757**
Total Complaints	120	70	81	54	53	85	71	77	29	640

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Fair Housing Complaints

By Issue

Fair Housing Complaints by Issue
Summit County
2004–2012 HUD Data

Issue	Total
Discrimination in terms, conditions or privileges relating to rental	146
Failure to make reasonable accommodation	136
Discriminatory terms, conditions, privileges, or services and facilities	101
Discriminatory refusal to rent	88
Discriminatory advertisement - rental	59
Other discriminatory acts	54
Discriminatory refusal to rent and negotiate for rental	34
Discriminatory acts under Section 818 (coercion, etc.)	31
Discriminatory advertising, statements, and notices	26
Discriminatory refusal to negotiate for rental	16
Discrimination in services and facilities relating to rental	13
False denial or representation of availability - rental	12
Discrimination in making of loans	9
Non-compliance with design and construction requirements (handicap)	9
Failure to provide accessible and usable public and common user areas	9
All Other	62
Total Issues	**805**
Total Complaints	640

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Home Mortgage Disclosure Act

Denial Rates by Race/Ethnicity of Applicant Summit County 2004–2011 HMDA Data	
Race/Ethnicity	**Average**
American Indian	25.6%
Asian	12.3%
Black	28.1%
White	12.0%
Average	**14.7%**
Non-Hispanic	13.5%
Hispanic	20.2%

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Home Mortgage Disclosure Act

Rate of HALs Originated by Race/Ethnicity of Applicant Summit County 2004–2011 HMDA Data	
Race/Ethnicity	**Average**
American Indian	11.8%
Asian	6.1%
Black	35.3%
White	11.9%
Average	**14.5%**
Non-Hispanic	13.7%
Hispanic	19.2%

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2012-13 Local Government Survey
Summit County Results

- Some have occupancy standards or limits
- Several have definition of family, some don't
- Most define "dwelling unit" or "residential unit", some don't know
- Some lack definition of "disability"
- Several indicated potential barriers for development of affordable housing
- Half lack fair housing ordinance, policy, regulation, or code chapter
- Half have some AFFH practices

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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 – Summit 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 – Summit 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 – Summit County

Identified Impediments:

Public Sector Impediments

1. Failure to have sufficient fair housing policies or practices by several 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 – Summit County

Identified Impediments:

Public Sector Impediments

5. Decisions regarding definitions of "family," "dwelling unit," and related terms
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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Vibrantneo.org/imagine

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