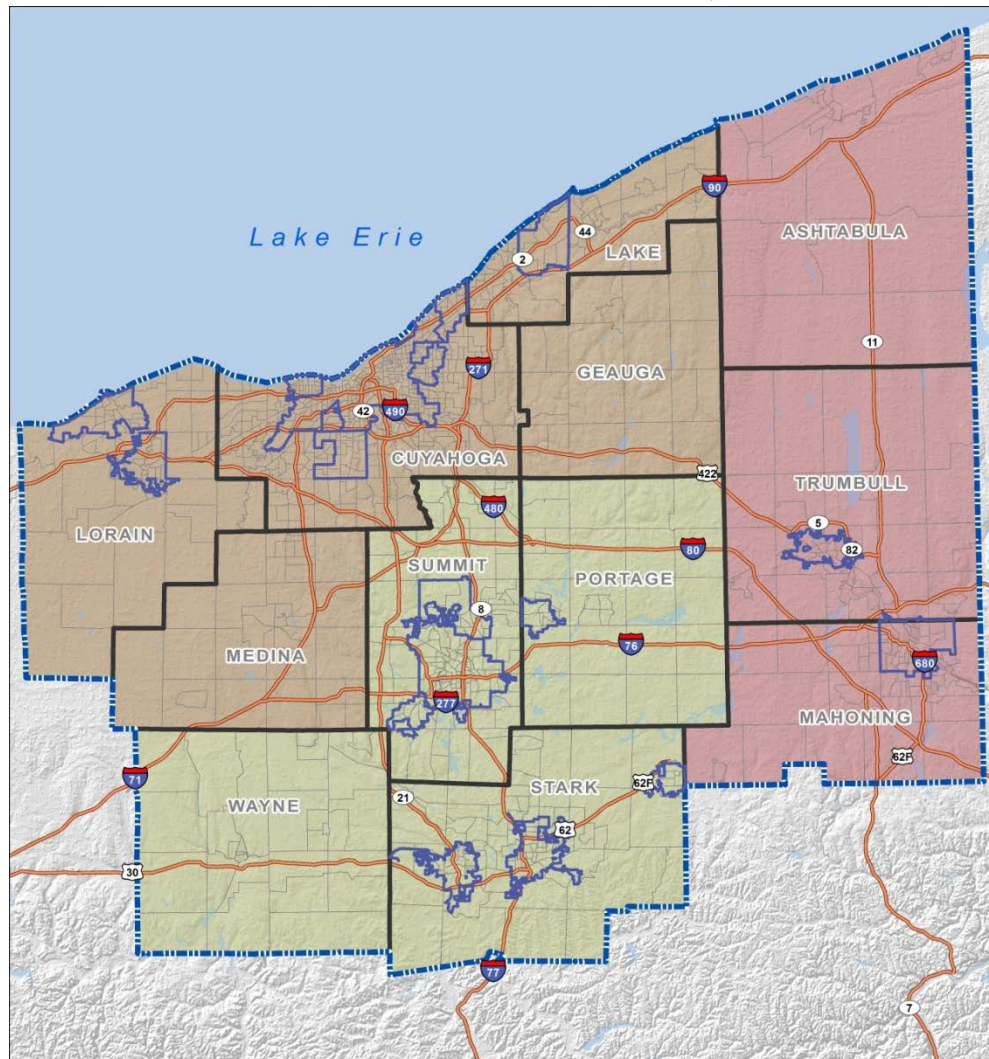


**NORTHEAST OHIO SUSTAINABLE COMMUNITIES CONSORTIUM**  
**2013 REGIONAL ANALYSIS OF IMPEDIMENTS**  
**TO FAIR HOUSING CHOICE AND**  
**FAIR HOUSING AND EQUITY ASSESSMENT**



**VOLUME I: MPO/COG METRO AREAS**  
**FINAL REPORT**  
**OCTOBER 16, 2013**





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2013 REGIONAL ANALYSIS OF IMPEDIMENTS  
TO FAIR HOUSING CHOICE AND  
FAIR HOUSING AND EQUITY ASSESSMENT**

**VOLUME I: MPO/COG METRO AREAS**

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# EXECUTIVE SUMMARY

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## A. SUMMARY OF BACKGROUND FINDINGS

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### SOCIO-ECONOMIC CONTEXT

Analysis of demographic, economic, and housing data provides information about the level and results of past locational choices. As observed, the same areas in the region contain several problematic concerns. This includes over concentrations of racial and ethnic minorities, high rates of poverty, notable racially and ethnically concentrated areas of poverty, and often areas that lack good transportation connections between areas of low-income and employment opportunities. Furthermore, the spatial distribution of areas lacking opportunity tended to correlate highly with the above-listed areas.

### FAIR HOUSING ENVIRONMENT

The Region comprises 12 counties, containing the geographic areas of the Northeast Ohio Areawide Coordinating Agency (NOACA) including Cuyahoga, Lake, Lorain, Medina and Geauga, the Northeast Ohio Four County Regional Planning and Development Organization (NEFCO), including Portage, Stark, Summit and Wayne , and the Eastgate Regional Council of Governments (Eastgate) including the counties of Ashtabula, Mahoning and Trumbull.

A review of the fair housing profile in the NEOSCC Region revealed that several organizations provide fair housing services on the federal, state, and local levels. They all provide outreach and education, complaint intake, and testing and enforcement activities for both providers and consumers of housing. Examples include HUD, the Ohio Civil Rights Commission (OCRC), the Fair Housing Contact Service (FHCS), Housing Advocates, Inc., the Housing Research and Advocacy Center (HRAC), and the Fair Housing Resource Center, Inc (FHRC).

### BARRIERS TO HOUSING CHOICE IN THE PRIVATE SECTOR

Evaluation of the private housing sector included review of home mortgage loan application information, mortgage lending practices, fair housing complaint data, and results from the private sector section of the 2012–2013 Fair Housing Survey for Housing Stakeholders.

Home Mortgage Disclosure Act (HMDA) data were used to analyze differences in home mortgage application denial rates in the NEOSCC Region by race, ethnicity, sex, income, and Census tract. Evaluation of home purchase loan applications from 2004 through 2011 showed that there were 328,557 loan originations and 65,149 denials, for an eight-year average loan denial rate of 16.5 percent. Denial rates were highest in 2006, at 20.0 percent. These HMDA data also showed that American Indian, black, and Hispanic applicants experienced far higher rates of loan denials than did white or Asian applicants, even after correcting for income in most cases. Further, these more frequently denied racial and ethnic groups may have been disproportionately impacted in some specific areas of the Region.



Analysis of originated loans with high annual percentage rates showed that black and Hispanic populations were also disproportionately issued these types of lower-quality loan products. Black borrowers experienced a rate nearly twice that of white applicants, for example. With high proportions of low quality, high-annual percentage rate loans being issued to these particular groups, the burden of foreclosure may have fallen more heavily upon them.

Analysis of data from the Community Reinvestment Act (CRA), which is intended to encourage investment in low- and moderate-income areas, showed that business loans did not tend to be directed toward the areas with highest poverty concentrations in the NEOSCC Region as commonly as they were toward moderate- and higher-income areas.

Fair housing complaint data were analyzed from HUD, the OCRC, the HRAC, the FHCS, and the FHRC. HUD data showed that 2,297 fair housing-related complaints were filed in the Region from 2004 through September of 2012. The number of complaints filed with this agency varied by year, ranging from 205 to 347. The protected classes most impacted by discrimination, based on the 1,184 complaints where cause was found, were disability, familial status, and race, and the most common complaint issues related to failure to make reasonable accommodation, discrimination in terms, conditions or privileges relating to rental, and discriminatory refusal to rent.

Complaints filed with the OCRC showed that of the 2,089 complaints, the most common issues were terms and conditions, reasonable accommodation, exclusion, harassment, and intimidation.

Results from the private sector portion of the 2012–2013 Fair Housing Survey for Housing Stakeholders, conducted from November of 2012 to July of 2013 as part of the Regional AI process, showed that some respondents saw possible issues of housing discrimination in the NEOSCC Region's private housing sector.

## **BARRIERS TO HOUSING CHOICE IN THE PUBLIC SECTOR**

The status of affirmatively furthering fair housing (AFFH) within the NEOSCC Region's public sector was evaluated through review of selected public services, local policies, and practices; and the results of the public sector section of the 2012–2013 Fair Housing Survey for Housing Stakeholders.

Evaluation of the distribution of housing vouchers, HUD-assisted rental properties, and other affordable housing in the Region demonstrated that these assisted housing options were relatively widely distributed, and tended to be concentrated in areas other than those with the highest poverty rates.

The 2012–2013 Fair Housing Survey for Government Officials, conducted online with many of the Region's nonentitlement cities and counties, showed that many of these jurisdictions have in place some basic housing definitions such as "dwelling unit" and "family," but most tend to be restrictive and may not be in the spirit of AFFH. Very few communities define "disability" in their codes or have policies in place to offer options for persons in need of modifications to policies for reasonable accommodation. Housing for seniors and group housing are not

consistently addressed in local codes, despite being accommodated in State codes. Most communities lack fair housing ordinances or practices. Across the array of communities contacted, a wide variety of policies and practices exist, several of which are not in the spirit of AFFH and may unwittingly discriminate against several groups. A more complete, consistent, and uniform approach could greatly benefit these communities in the Region.

Results of the Land Use Planning Interviews, conducted with the 22 entitlement cities and counties located within the NEOSCC Region, revealed many similar issues among these communities. Some definitions of “dwelling unit” and “family” restricted housing to related families of a certain size or type, and some restricted group housing by zone despite State protections. Very few considerations were found for accessible housing or senior housing, and some policies restricting the concentration of group homes were found. Some cities may need to update their policies and codes in order to reflect the spirit of AFFH.

Some variations in local land use policies were seen within the NEOSCC Region. Within the NOACA metro area in particular, several potentially discriminatory definitions of “family” were seen, as well as several entitlement cities with no definition for “disability.” In addition, multiple group home density restrictions were seen; these may not be in the spirit of AFFH. In the NEFCO metro area, a few “family” or “dwelling unit” definition concerns were found, as well as some cities with no definition of “disability” and two cities with possibly restrictive group home policies. In the Eastgate metro area, many communities lacked policies or provisions for providing housing for particular groups, although few potential impediments were found. However, lack of provision for group homes and group home density restrictions were seen.

Results from the public sector section of the 2012–2013 Fair Housing Survey for Housing Stakeholders revealed that some respondents in the NEOSCC Region believe there are problematic practices or policies within the public sector. Of those that did, some noted land use policies and zoning laws that particularly impact protected class populations by limiting the location of group homes and other multi-family housing, and some respondents suggested that public transit services are lacking.

## **PUBLIC INVOLVEMENT**

Public involvement opportunities were an intrinsic part of the development of this Regional AI. Activities included the 2012–2013 Fair Housing Survey for Housing Stakeholders to evaluate current fair housing efforts and the 13 fair housing forums wherein citizens were offered the chance to comment on initial findings of the Regional AI and offer feedback on prospective impediments. Also held were 11 formal fair housing presentations.

Results of the 2012–2013 Fair Housing Survey for Housing Stakeholders showed that the majority of respondents felt that fair housing laws are useful, whereas some respondents were not familiar with fair housing law. Of the respondents who answered the question, many noted the need for increased fair housing education and outreach activities, and a moderate need was indicated for increased fair housing testing activities.

The 13 public forums held across the Region in March of 2013 allowed citizens and agencies to voice concerns about barriers to fair housing choice. Comments received at these forums focused on lack of transportation options for some populations as well as predatory lending, primarily toward racial and ethnic minorities.

## **B. IMPEDIMENTS, SUGGESTED ACTIONS, AND MEASURABLE OBJECTIVES**

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The following narrative presents the summary findings of the Regional Analysis of Impediments to Fair Housing Choice for the 12-County NEOSCC Region. These findings address each of the three metro areas, NOACA, NEFCO, and Eastgate, together as well as separately.

### **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 rating, 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.

## **PUBLIC SECTOR**

1. *Impediment: Lack of 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. Encourage option.

2. *Impediment: Lack of sufficient fair housing outreach and education efforts*

While Northeast Ohio tends to have a strong fair housing advocacy base, there still seems to be a lack of a sufficient 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:* Some 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:* Policies and practices used decades ago have resulted in segregation of minority populations

Fair housing choice in the Region is today still affected by bygone historical policies and practices that resulted in segregation of minority populations. This impediment may still 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:* Decisions regarding definitions of "family," "dwelling unit," and related terms

Decisions made by cities within the Region regarding definitions of "family," "dwelling unit" and related terms within land use planning and zoning policies may restrict housing choice for the classes of race, national origin, familial status and disability. This impediment was identified through review of the results of the Fair Housing Survey for Government Officials.

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. Encourage adoption.

6. *Impediment: Lack of inclusionary 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 different types of housing throughout the Region.

## C. FAIR HOUSING AND EQUITY ASSESSMENT FINDINGS

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Equity and access to opportunity are critical underpinnings of the Sustainable Communities Regional Planning Grant (SCRPG) program. Grantees are creating a more inclusive conversation on regional issues, with a particular emphasis on engaging those who have traditionally been marginalized from the community planning process. This has provided new insight into the disparate burdens and benefits experienced by different groups across a region. One way to address these disparities is the Fair Housing and Equity Assessment (FHEA), which SCRPG program participants are required to complete.

### INTEGRATION AND SEGREGATION

This FHEA evaluation quantified indices of segregation. These indices indicate that the NEOSCC Region had a lack of racial and ethnic diversity in some areas and high concentrations of racial and ethnic minorities in other areas. All three planning areas have counties that have dissimilarity indices that indicate the presence of high levels of segregation. These tend to have grown from a series of historical decisions pertaining to past discrimination and segregation actions by both public and private sector decision makers. It is time for our legacy to change.

### RACIALLY AND ETHNICALLY CONCENTRATED AREAS OF POVERTY

There were 61 Census tracts that were made up of at least 40 percent poverty and 50 percent non-white racial minorities (RCAPs); there was also one Census tract that had an ethnically concentrated area of poverty (ECAPs) throughout the NEOSCC Region, for a combined total of 61 tracts, or about 5.7 percent of the total tracts as of 2011. Census tracts representing RCAPs and/or ECAPs appeared in all three planning areas, with 41 in NOACA, 9 in NEFCO, and 11 in Eastgate. More than 96 percent of these RCAP and/or ECAP areas had unemployment rates of 10.1 percent or more, 98 percent of these tracts had more than one-third of renters experiencing cost burdens; more than 95 percent of these tracts had “other vacant” rates of 13.6 percent or more; and more than 75 percent had neighborhood school proficiency index values of less than 20, or very low.

## AREAS OF OPPORTUNITY

Areas of opportunity were quantitatively defined by a set of five relationships constructed of education, economics, housing, transportation, and public health. Within these categories, variables that were chosen include:

- A school proficiency index,
- High school graduation rates,
- A Labor market index,
- The share of housing that is occupied,
- The homeownership rate,
- The lack of overcrowding,
- The lack of predatory loans,
- A high quality transit services index,
- Travel times to work, and
- An environmental hazard index.

Data were available at the Census tract- or block group-level.

The NEOSCC Region has 91 Census tracts with the highest ranking of opportunity. Of these 39 are in NOACA, 37 are in NEFCO, and 15 are in Eastgate. Interestingly, the metro area with the fewest people also has a proportionately greater number of areas of opportunity.

## A CALL FOR PUBLIC AND PRIVATE INVESTMENT

While specifying what particular efforts should be implemented throughout the 12-County Region is beyond the scope of this part of the NEOSCC Regional AI, key actions will be considered as part of NEOSCC's larger planning effort, Vibrant NEO 2040. Substantial economic development, public infrastructure, and affordable housing investments will result in gains, gains that will reduce disparities in burdens and benefits enjoyed by living in the NEOSCC Region.

Areas that have received private sector investment in the past have typically not been in areas of lower income residents, as demonstrated by the Community Reinvestment Act data evaluation. Areas that contain RCAP or ECAP areas are in need of both public and private investment.

Such investment can be removal of "other vacant" dwellings not available to the marketplace, rehab of existing structures, redevelopment of existing vacant buildings, redevelopment of underutilized housing, or replacement of old and dilapidated infrastructure. Expansion of the public transportation system is a key objective. Greater access to areas of opportunity would be a key in the process of creating opportunity to those currently not able to access these areas of the NEOSCC Region. Additionally, future investments in public and assisted housing, particular for the production of affordable housing, should consider the spatial distribution of existing residents and whether the proposed affordable housing project is over concentrating racial and ethnic minorities.



# I. INTRODUCTION

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## A. OVERVIEW

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The Northeast Ohio Sustainable Communities Consortium (NEOSCC) and this Regional Analysis of Impediments for Fair Housing Choice are funded as part of a highly competitive, first-of-its kind, \$4.25 million federal grant from the U.S. Department of Housing and Urban Development (HUD) as part of the Partnership for Sustainable Communities. Part of that program, the Sustainable Communities Initiative (SCI), is an interagency collaboration between HUD, the U.S. Department of Transportation, and the U.S. Environmental Protection Agency.

In June 2009, these three agencies joined together to create the Partnership for Sustainable Communities. The aim of the Partnership is to help communities nationwide improve access to affordable housing, increase transportation options, and lower transportation costs while protecting the environment.

The Regional Analysis of Impediments for Fair Housing Choice (Regional AI) is one component of the NEOSCC's planning efforts to create a shared vision for a more vibrant, resilient, and sustainable Northeast Ohio for all of its residents.

One of the SCI's grant programs is the Sustainable Communities Regional Planning Grant Program (SCRPG), which supports metropolitan and multijurisdictional planning efforts that integrate housing, land use, economic and workforce development, transportation, and infrastructure. In particular, this is implemented through a Fair Housing and Equity Assessment (FHEA), a method that aids in identifying priorities for future investments that enhance equity and access to opportunity. Equity refers to development patterns that structure social and economic opportunities of residents, where uneven spatial development patterns may reinforce old racial and class divides, or even create new ones. Areas of opportunity are physical places, areas within communities that provide everything one needs to thrive, including quality employment, good schools, affordable housing, efficient public transportation, safe streets, services, parks, and full-service grocery stores. Areas lacking opportunity, then, have the opposite of these attributes. Equitable development requires thinking about equity impacts at the front end, prior to the investment occurring.<sup>1</sup> That thinking involves analysis of demographic and market data to evaluate current issues for citizens who may have previously been marginalized from the community planning process.

That notion also involves three separate steps for completion of a Regional Fair Housing and Equity Assessment: 1) data, 2) deliberation; and 3) decision making. This report explores data that has been collected through both quantitative and qualitative methods and makes recommendations about the findings of the analysis. These recommendations are designed to initiate the deliberation of the equity discussions, as well as aid in prioritizing investments decisions throughout the region.

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<sup>1</sup> Regional Equity and the Quest for Full Inclusion. PolicyLink, 2008.



## COMMUNITY PLANNING AND DEVELOPMENT GRANTS

In 1994, the HUD's Office of Community Planning and Development issued new rules consolidating the planning, application, reporting and citizen participation processes for four formula grant programs: Community Development Block Grants (CDBG), Home Investment Partnerships (HOME), Emergency Shelter Grants program (ESG),<sup>2</sup> and Housing Opportunities for Persons with HIV/AIDS (HOPWA). The new single-planning process was intended to more comprehensively fulfill three basic goals: to provide decent housing, to provide a suitable living environment and to expand economic opportunities. This was termed the Consolidated Plan for Housing and Community Development.

Within that context, the CDBG program has a regulatory requirement based on obligations found in Section 808(e)(5) of the Fair Housing Act, which requires the HUD Secretary to administer the department's housing and community development programs in a manner that "affirmatively furthers fair housing." The HOME Investment Partnerships program finds its statutory requirements in the Comprehensive Housing Affordability Strategy, a product of the 1990 Cranston-Gonzalez National Affordable Housing Act.

So, as a consequence of that, in March 1996, HUD released a two-volume *Fair Housing Planning Guide*. The first volume related to a historical perspective of fair housing as well as how to prepare an AI, how to undertake activities to correct any identified impediments, and the types of documentary records that are to be maintained. In the guide, HUD defines "affirmatively furthering fair housing" obligations as having three elements:

- Conducting an analysis to identify impediments to fair housing choice,
- Taking appropriate actions to overcome the effects of any impediments identified therein, and
- Maintaining records reflecting the analysis and actions taken.<sup>3</sup>

While the commitment to affirmatively further fair housing is not defined by statute, HUD requires its CPD grantees to conduct an analysis to identify impediments to fair housing choice within the jurisdiction and to take actions to overcome the impediments recognized in the study. HUD describes impediments to fair housing as:

- "Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin that restrict housing choices or the availability of housing choices and
- Any actions, omissions, or decisions which have [this] effect."<sup>4</sup>

While Title VIII of the Civil Rights Act of 1968 provides the list of federally protected classes listed above, states and local units of government may also enact fair housing laws that extend protection to additional classes of persons.

HUD interprets the broad objectives of affirmatively furthering fair housing to include:

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<sup>2</sup> The Emergency Shelter Grants program was renamed the Emergency Solutions Grants program in 2011.

<sup>3</sup> (HUD FHEO 1996) *Fair Housing Planning Guide*. Vol. 1.

<sup>4</sup> *Ibid.*

- Analyzing and working to eliminate housing discrimination in the jurisdiction;
- Promoting fair housing choice for all persons;
- Providing opportunities for racially and ethnically inclusive patterns of housing occupancy;
- Promoting housing that is physically accessible to and usable by all persons, particularly persons with disabilities; and
- Fostering compliance with the nondiscrimination provisions of the Fair Housing Act.

The AI therefore represents a comprehensive examination of both quantitative and qualitative information. Extending beyond a simple identification of violations of fair housing law, the AI is a process that explores key issues and obstacles that influence affirmatively furthering fair housing as well as the effectiveness of the fair housing system.

In the NEOSCC Region, there are 22 such units of local government, both cities and counties, that prepare Consolidated Plans for Housing and Community Development; these 22 jurisdictions also prepare AIs for submittal to HUD. Furthermore, the State of Ohio Community Development Department must prepare its own Analysis of Impediments to Fair Housing Choice; the CDBG, HOME, ESG, or HOPWA funds it receives are directed to nonentitlement areas of the State.

## ECONOMIES OF SCALE IN FAIR HOUSING EVALUATIONS

In January of 2012, HUD Secretary Shaun Donovan, recognizing that an FHEA and AI are similar and overlapping studies, urged communities receiving an SCRPG required to prepare an FHEA also consider an alternative, the Regional Analysis of Impediments to Fair Housing Choice. A Regional AI can be a more valuable tool for effectively and proactively assessing fair housing issues at the regional level, as well as fulfilling one of several Sustainable Communities goals, making government more efficient and responsive to community needs.

The requirements of this Regional AI also provided the 22 communities with an opportunity of having their Analyses of Impediments conducted within a Regional context, as one larger study rather than 22 separate efforts. The NEOSCC is commended for preparing an analysis that addresses all the pieces required for the local units of government. **Volume I** of the Regional AI emphasizes the FHEA components to these studies, while **Volumes II** and **III** devote significant effort to analyzing impediments to fair housing choice.

## B. NORTHEAST OHIO SUSTAINABLE COMMUNITIES CONSORTIUM

During the summer of 2010, a group of key Northeast Ohio regional players, including the Region's metropolitan planning organizations, six of the 12 counties, five of the largest cities, three metropolitan housing authorities, the Fund for Our Economic Future, the Regional Prosperity Initiative, and Cleveland State University, convened to develop and submit a proposal for the Partnership for Sustainable Communities Category One: Planning Grants. During the proposal planning process, which was funded by the Fund for Our Economic Future, this unprecedented collaboration of stakeholders in Northeast Ohio agreed to establish a new, independent initiative with a formal, truly collaborative governance structure and a

small but dedicated operating structure. The Northeast Ohio Areawide Coordinating Agency (NOACA) volunteered to serve as the lead applicant and fiscal agent on the proposal submission.

In November of 2010, Northeast Ohio was awarded a \$4.25 million federal grant from HUD to fund the development of a regional sustainability plan. In order to manage the three-year planning process, the Northeast Ohio Sustainable Communities Consortium (NEOSCC) was established in January 2011. The NEOSCC will develop a coordinated and integrated approach to planning efforts for land use, transportation, economic and workforce development, and infrastructure investments for a 12-county planning area comprising Ashtabula, Cuyahoga, Geauga, Lake, Lorain, Mahoning, Medina, Portage, Summit, Stark, Trumbull, and Wayne counties.

Building on the original 23 member organizations, the NEOSCC Board has added 10 additional members and now includes 33 organizations. These members have committed more than \$2.3 million of in-kind services as part of the required match for the grant proposal.

NEOSCC's mission is to create conditions for a more vibrant, resilient, and sustainable Northeast Ohio, a region that is full of vitality, is a good steward of its built and natural resources, and is adaptable and responsive to change. As of early 2013, the NEOSCC's membership included:

- Akron Metropolitan Area Transportation Study (AMATS)
- Akron Metropolitan Housing Authority
- Akron Urban League
- Ashtabula County
- Catholic Charities, Diocese of Youngstown
- The Center for Community Solutions
- City of Akron
- City of Cleveland
- City of Elyria
- City of Youngstown
- Cleveland Metroparks
- Cleveland Museum of Natural History
- Cleveland State University
- Cuyahoga County
- Cuyahoga Metropolitan Housing Authority
- Eastgate Regional Council of Governments (Eastgate)
- Fund for Our Economic Future
- Greater Cleveland RTA
- Lorain County Community College
- Lorain County Growth Partnership
- Mahoning County
- Northeast Ohio Areawide Coordinating Agency (NOACA) (Fiscal agent)
- Northeast Ohio Community Development Alliance
- Northeast Ohio Four-County Regional Planning & Development Organization (NEFCO)

- Policy Bridge
- Regional Prosperity Initiative
- Stark County
- Stark County Regional Planning Commission/Stark County Area Transportation Study (RPC/SCATS)
- Stark Metropolitan Housing Authority
- Summit County
- Summit County Health District
- Trumbull County
- Youngstown State University<sup>5</sup>

The Regional AI process was led by the NEOSCC and its Regional AI Progress Review Team, which was made up of members of the entitlement communities, nonentitlement counties, and a few metropolitan housing authorities.

This volume of the Regional AI includes an analysis that identifies both Census tract specific and region-wide equity and opportunity issues. It also addresses regional and region-wide impediments to fair housing choice. The other two volumes of this document focus more specifically on impediments seen and encountered in the Region.

## ORGANIZATION OF THE THREE-VOLUME REGIONAL AI REPORT

The Region comprises 12 counties, containing the geographic areas of the Northeast Ohio Areawide Coordinating Agency (NOACA), the Northeast Ohio Four County Regional Planning and Development Organization (NEFCO), and the Eastgate Regional Council of Governments (Eastgate). The counties and geographic areas covered by each of these organizations are presented in Map 1.1.

However, the NEOSCC Region also has 22 entitlement communities comprising 18 cities and four of the Region's counties, the boundaries for all the entitlement cities are shown on Map 1.1 as well, with the legend identifying the entitlement counties. Consequently, there are three volumes to this Regional AI.

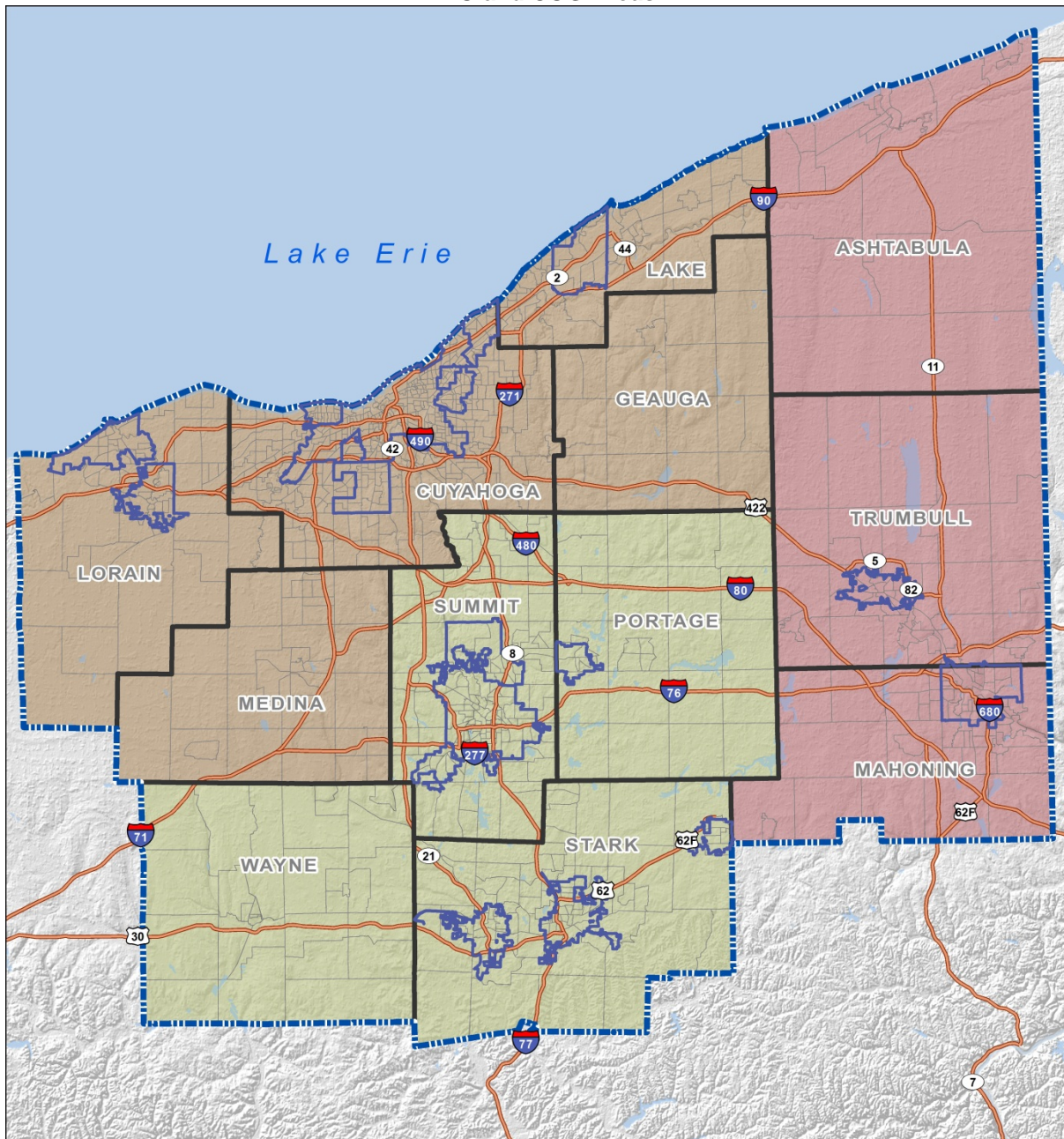
**Volume I** presents the MPO and COG service areas, with particular emphasis on the requirements of a Fair Housing and Equity Assessment (FHEA). There are tables, charts, geographic maps, and related narratives all of which focus on the Region in its entirety and more general comparisons across the three MPO/COG operating areas. This particular document spends considerably more effort on the evaluation and reporting integration and segregation indices, racially and ethnically concentrated areas of poverty, and areas of opportunity seen in the three regions and the NEOSCC Region in its entirety.

**Volume II** segments the geographic areas of the NEOSCC Region differently, separating it into six housing market areas, as presented in Map 1.2. This document evaluates data in a similar fashion to that of **Volume I**, but provides additional details about both the FHEA and Regional AI.

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<sup>5</sup> (NEOSCC 2012)

**Map I.1**  
**MPO and COG Areas**



### LEGEND

#### Northeast Ohio Region MPO and COGs

Eastgate NEFCO NOACA

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

NEOSCC Boundary  
County Boundaries  
Census Tract Boundaries

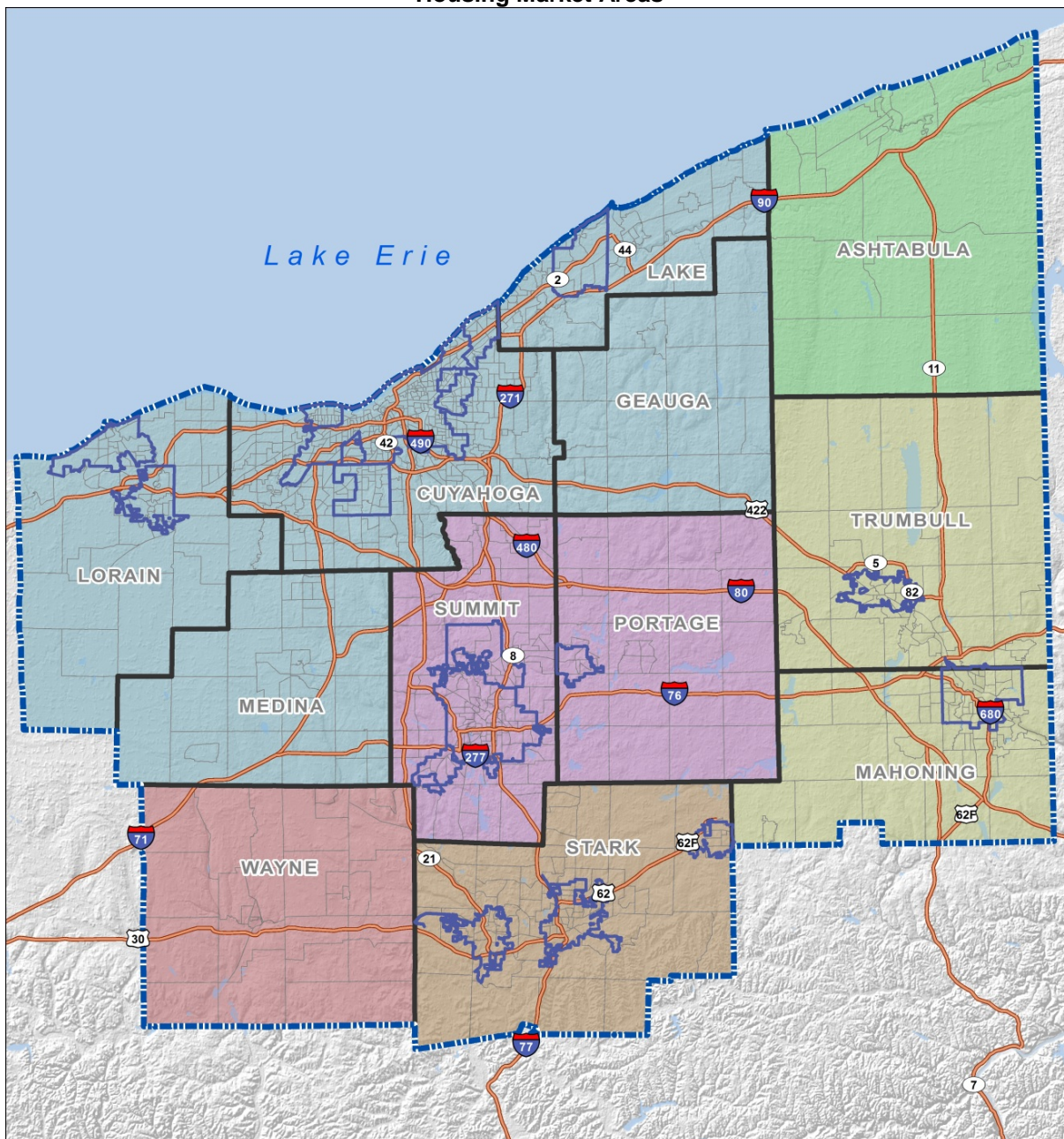
Major Roads

0 10 Miles





**Map I.2**  
**Housing Market Areas**



### LEGEND

#### Northeast Ohio Region Housing Market Areas

Akron	Canton-Massillon	Wooster
Ashtabula	Cleveland	Youngstown-Warren

Entitlement City Boundaries

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

Data Source: NEOSCC

- NEOSCC Boundary
- County Boundaries
- Census Tract Boundaries
- Major Roads

0 10 Miles

There is also a **Volume III**. This rather large document comprising two printed parts has segmented quantitative and qualitative data for each entitlement, the nonentitlement areas of each county, then summed this information to the total county. Then all the county data are summed to the housing market area, as well as each of the MPO/COG areas. Specifics associated with the FHEA are not presented in this third volume. However, impediments to fair housing choice are identified for each level of the **Volume III** geography, along with suggestions that local communities can consider. Consequently, there are actually 49 geographic areas, including a separate tabulation for the Cuyahoga Urban County. Exhibit 1.1 presents these areas, organized as they are to be presented in **Volume III**.

**Exhibit I.1**  
**Volume III Geographic Area Designations**

NEOSCC Region  
2013 NEOSCC Data

Area	Area
<b>MPO/COG Areas</b>	<b>Counties and Entitlement Cities (Cont'd)</b>
1. NEOSCC Region	24. Lorain County
2. NOACA Metro Area	25. Elyria
3. NEFCO Metro Area	26. Lorain
4. Eastgate Metro Area	27. Remainder of Lorain County
	28. Mahoning County
<b>Housing Market Areas</b>	29. Youngstown
5. Akron Housing Market Area	30. Remainder of Mahoning County
6. Ashtabula Housing Market Area	31. Medina County
7. Canton-Massillon Housing Market Area	32. Portage County
8. Cleveland Housing Market Area	33. Kent
9. Wooster Housing Market Area	34. Remainder of Portage County
10. Youngstown-Warren Housing Market Area	35. Stark County
	36. Alliance
<b>Counties and Entitlement Cities</b>	37. Canton
11. Ashtabula County	38. Massillon
12. Cuyahoga County	39. Remainder of Stark County
13. Cleveland	40. Summit County
14. Cleveland Heights	41. Akron
15. East Cleveland	42. Barberton
16. Euclid	43. Cuyahoga Falls
17. Lakewood	44. Remainder of Summit County
18. Parma	45. Trumbull County
19. Remainder of Cuyahoga County	46. Warren
20. Geauga County	47. Remainder of Trumbull County
21. Lake County	48. Wayne County
22. Mentor	49. Cuyahoga Urban County
23. Remainder of Lake County	

## C. RESEARCH METHODOLOGY

The Regional AI process involves a thorough examination of a variety of sources from both the public and private sectors as related to housing, particularly for persons who are protected under fair housing laws. It also includes a broad array of information that is used to compute levels of concentrated poverty, indices of segregation, and areas of opportunity. Additional Regional AI sources include Census data, employment and income information, home mortgage application data, business lending data, fair housing complaint records, surveys of housing industry experts and stakeholders, and telephone interviews with planners throughout the region. Some data and information were also received directly from HUD, or the

inspiration for computing the data were derived from HUD guidance. The following describes the larger pieces of that analytical effort.

The data for this Regional AI come from a variety of publically available data sources augmented with additional data collected specifically for this project. Below is a brief discussion of how these data were gathered.

## SOCIOECONOMIC DATA

Secondary and quantitative data were drawn from the Census Bureau, including 2000 and 2010 Census counts, as well as American Community Survey data averages from 2006 through 2010. Data from these sources included population, households, racial and ethnic attributes of the population, household and personal income, poverty, housing occupancy, housing units by tenure, cost burdens, and housing conditions. Other data were drawn from records provided by the Bureau of Labor Statistics, the Bureau of Economic Analysis, and a variety of other sources.

The Census data presented in this report came from four different data products offered by the U.S. Census Bureau. All Census products can be queried using the American Fact Finder, <http://factfinder2.census.gov>. However, more advanced data users may retrieve the data from one of the locations shown below.

- Intercensal Population Estimates offer population counts between decennial censuses: <http://www.census.gov/popest/data/datasets.html>.
- The 2000 Census data come from two separate files, the summary file (SF) 1 full count and the SF3 one-in-six sample:  
[http://www2.census.gov/census\\_2000/datasets/Summary\\_File\\_1/Ohio/](http://www2.census.gov/census_2000/datasets/Summary_File_1/Ohio/) and  
[http://www2.census.gov/census\\_2000/datasets/Summary\\_File\\_3/Ohio/](http://www2.census.gov/census_2000/datasets/Summary_File_3/Ohio/).
- The 2010 Census SF1 can be found here: [http://www2.census.gov/census\\_2010/04-Summary\\_File\\_1/Ohio/](http://www2.census.gov/census_2010/04-Summary_File_1/Ohio/), or can be converted to a .SAS file from the University of Missouri: <http://mcdc.missouri.edu/cgi-bin/uexplore?/pub/data/sf12010>.
- The 2010 five-year ACS data can be found here: [http://www2.census.gov/acs2010\\_5yr/summaryfile/2006-2010\\_ACSSF\\_By\\_State\\_All\\_Tables/](http://www2.census.gov/acs2010_5yr/summaryfile/2006-2010_ACSSF_By_State_All_Tables/). The disability data is only available in the 3-year ACS data, available here: [http://www2.census.gov/acs2010\\_3yr/summaryfile/2008-2010\\_ACSSF\\_By\\_State\\_All\\_Tables/](http://www2.census.gov/acs2010_3yr/summaryfile/2008-2010_ACSSF_By_State_All_Tables/).

Bureau of Economic Analysis (BEA) data on employment and income came from four specific tables in the BEA's Local Areas Personal Income and Employment Dataset: the CA04, CA05, CA25, and CA30 tables. These can be accessed here: <http://www.bea.gov/iTable/iTable.cfm?ReqID=70&step=1&isuri=1&acrdn=5#reqid=70&step=1&isuri=1> or downloaded here: <http://www.bea.gov/regional/downloadzip.cfm>.

The Bureau of Labor Statistics (BLS) data about the labor force for county and sub-county geographies are from the BLS's Local Area Unemployment Statistics, which can be found here: <http://www.bls.gov/lau/>. They also can be downloaded in text file format here: <ftp://ftp.bls.gov/pub/time.series/la/>.

Specific data were drawn from HUD's Office of Policy Development and Research FHEA database, specifically designed for use with the SCI grant requirements associated with an FHEA. These data included such information as Racially Concentrated Areas of Poverty (RCAPs); Ethnically Concentrated Areas of Poverty (ECAPs); racial and ethnic indices such as the isolation index, diversity index, dissimilarity index, and job access index. These data were derived for the Census tracts and block groups, and are presented in geographic maps.

## **BARRIERS IN THE PRIVATE SECTOR**

### ***Lending Data***

To examine possible fair housing issues in the home mortgage market, Home Mortgage Disclosure Act (HMDA) data were analyzed. The HMDA was enacted by Congress in 1975 and has since been amended several times. It is intended to provide the public with loan data that can be used to determine whether financial institutions are serving the housing credit needs of their communities and to assist in identifying possible discriminatory lending patterns. HMDA requires lenders to publicly disclose the race, ethnicity, and sex of mortgage applicants, along with loan application amounts, household income, the Census tract in which the home is located, and information concerning prospective lender actions related to the loan application. For this analysis, HMDA data from 2004 through 2010 were analyzed, with the measurement of denial rates by Census tract and by race and ethnicity of applicants the key research objectives. These data were also examined to identify the groups and geographic areas most likely to encounter higher denial rates and receive loans with unusually high interest rates.

The 2009–2011 HMDA data are provided from the FFIEC here:

<http://www.ffiec.gov/hmda/hmdaraw.htm>. Data for years prior to 2009 must be ordered from the National Archives: <http://www.ffiec.gov/hmda/nationalarchives.htm>

The CRA data for 2005–2011 are provided online by the FFIEC: <http://www.ffiec.gov/cra/craproducts.htm> and must be ordered here: <http://www.ffiec.gov/orderform.htm> for years prior to 2005.

### ***Housing Complaint Data***

Housing complaint data were used to analyze discrimination in the renting and selling of housing. HUD provided fair housing complaint data for the Region from January of 2004 through September of 2012. This information included the basis, or protected class pursuant to the complaint; the issue, or prospective discriminatory action, pursuant to the grievance; and the closure status of the alleged fair housing infraction, which relates to the result of the investigation. The review of 2,297 fair housing complaints from within the Region allowed for inspection of the tone, the relative degree and frequency of certain types of unfair housing practices, and the degree to which complaints were found to be with cause. The Ohio Civil Rights Commission (OCRC), Fair Housing Contact Service (FHCS), and Fair Housing Resource Center (FHRC) also provided housing complaint and intake information for the same period. Analysis of complaint data focused on determining which protected classes may have been disproportionately impacted by housing discrimination based on the number of complaints, while acknowledging that many individuals may be reluctant to step forward with a fair housing complaint for fear of retaliation or similar repercussion.

Housing discrimination data were requested from and provided by HUD (<http://portal.hud.gov/hudportal/HUD>), the OCRC (<http://crc.ohio.gov/>), the FHCS (<http://www.fairhousingakron.org/>), and the FHRC (<http://www.fhrc.org/>).

## **BARRIERS IN THE PUBLIC SECTOR**

### ***Public Services***

Community features, including public services and facilities, are essential parts of good neighborhoods, leading to a more desirable community and more demand for housing in these areas. Conversely, lack of public services and facilities may be detrimental to neighborhoods. The Regional AI evaluated the location of multi-family assisted and low income housing tax credit housing compared to racial and ethnic concentrations, to evaluate whether the distribution of such housing correlated with over-concentrations of poverty.

### ***Government Official Surveys and Interviews***

This Regional AI also reviews public sector land use policies and codes to evaluate any potential effects of public sector practices and policies that may not be in the spirit of affirmatively furthering fair housing. These data were collected online.

#### ***Fair Housing Survey for Government Officials***

Policies relating to housing development, special needs housing, and fair housing choice were addressed for nonentitlement jurisdictions in the NEOSCC Region in order to evaluate the public sector environment for a variety of housing types, including affordable housing, mixed-use housing, senior housing, and group homes. Because the policy environment of a jurisdiction can have a large effect on the type and quantity of housing built, in order to affirmatively further fair housing for all residents, local governments should consider the effects of their regulations.

In the Region's many nonentitlement cities and counties, public sector policies were evaluated through the 2012–2013 Fair Housing Survey for Government Officials, which were conducted online with planning, community development, building, and other staff. The purpose of the surveys was to gain detailed insight into common zoning and planning ordinances, practices, and policies and see if they might be construed as not in the spirit of AFFH. Survey questions related to several commonly defined practices and terms, such as:

- Definitions of “dwelling unit” and “family”;
- Occupancy standards;
- Definitions of “disability”;
- Development standards for housing for persons with disabilities;
- Programs or practices relating to the development of affordable, mixed-use, accessible, or senior housing; and
- Policies relating to group homes or other special needs housing.

### *Land Use Planning Interviews*

To gather similar information from planning staff at the 18 entitlement cities and four entitlement counties in the NEOSCC Region, telephone interviews were conducted. The names of appropriate planning and community development staff at these communities were solicited from members of the Progress Review Team, representing each entitlement community, and a survey nearly identical to the 2012–2013 Fair Housing Survey for Government Officials was conducted over the phone. This allowed for more thorough answers to the same key questions about public sector policies.

## **PUBLIC ENGAGEMENT AND INPUT**

### ***Housing Stakeholder Survey***

One of the methods HUD recommends for gathering public input about perceived impediments to fair housing choice is to conduct a survey. As such, the NEOSCC elected to utilize a survey instrument as a means to encourage public input in the Regional AI process. This step was a cost-effective and efficient method to utilize research resources. The survey data were collected online.

The 2012–2013 Fair Housing Survey for Housing Stakeholders targeted individuals involved in the housing arena, although anyone was allowed to complete the survey. An initial contact list was assembled by the NEOSCC and respondents were asked to forward the survey to their members, with the goal of targeting experts in at least the following areas:

- Residential and commercial building codes and regulations;
- Residential health and safety codes and regulations (structural, water, and sewer);
- Local land use planning;
- Banking and real estate;
- Renter rights and obligations, including civil rights; and
- Fair housing, disability, social service, and other advocacy organizations.

Furthermore, these entities were utilized to help promote public involvement throughout the Regional AI process. The 2012–2013 Fair Housing Survey for Housing Stakeholders, an internet-based instrument, received 165 replies; this effort was conducted from November 2012 through July of 2013.

The survey was designed to address a wide variety of issues related to fair housing and affirmatively furthering fair housing. If limited input on a particular topic was received, it was assumed that the entirety of stakeholders did not view the issue as one of high pervasiveness or impact. This does not mean that the issue was nonexistent in the Region, but rather that there was not a large perception of its prevalence, as gauged by survey participants.

### ***Fair Housing Forums***

As part of the process of involving the public in the development of the Regional AI, the NEOSCC conducted 13 fair housing forums during the week of March 11 of 2013. The forums



were designed to offer the public and stakeholders the opportunity to supply commentary on the status of fair housing in the Region as well as provide feedback on the initial findings of the Regional AI. A detailed discussion of these sessions is presented in **Section VI**.

### ***Formal Presentations***

Another 11 formal fair housing presentations were held across the Region during the week of June 17, 2013 to allow public input and reaction to preliminary findings of the Regional AI.

## **PUBLIC REVIEW**

The NEOSCC conducted the public input process associated with this Regional AI. The key actions that were used to notify the public of the Regional AI process included email announcements, public postings, newspaper advertisements and notices, phone calls, and other communication activities directed to citizens and stakeholders in the fair housing arena. The complete NEOSCC Engagement Framework for the Regional AI public review is presented in **Appendix A** of this document.

### ***Public Review Period***

The 30-day public review period for the Regional AI Draft for Public Review occurred in June and July of 2013. This Regional AI is available online at [www.VibrantNEO.org](http://www.VibrantNEO.org).





## II. SOCIO-ECONOMIC CONTEXT

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This section presents demographic, economic, and housing factors that influence housing choice as it relates to the NEOSCC Region, as well as the three MPO/COG areas. This information was collected from the Census Bureau, the Bureau of Economic Analysis, the Bureau of Labor Statistics, and other sources. Data were used to analyze a broad range of socio-economic characteristics, including population growth, race, ethnicity, segregation and integration, disability, employment, poverty, racially and ethnically concentrated areas of poverty, housing trends and areas of opportunity; these data are also available by Census tract, and are shown in geographic maps. Ultimately, the information presented in this section helps illustrate the underlying conditions that shape housing market behavior, housing choice, segregation, and opportunity in the NEOSCC Region.

To supplement 2000 and 2010 Census data, information for this analysis was also gathered from the Census Bureau's American Community Survey (ACS). The ACS data cover similar topics to the decennial counts but include data not appearing in the 2010 Census, such as household income and poverty. The key difference of these datasets is that ACS data represent a five-year average of annual data estimates, while Census data are based on point-in-time 100 percent counts; the ACS data reported herein span the years from 2006 through 2010. The ACS figures are not directly comparable to decennial Census counts because they do not account for certain population groups such as the homeless. However, percentage distributions from the ACS data can be compared to distributions from the 2000 and 2010 Censuses.

In addition, HUD's Office of Policy Development and Research (PDR) in 2012 made available selected data for Fair Housing and Equity Assessment evaluations. Some of this information is by Census tract, such as unemployment rates by Census tract.

### A. DEMOGRAPHICS

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A review of demographic data can help to better understand past housing location choices, particularly as the information is related to age, race, ethnicity, and a few other parameters. It can also highlight areas of segregation in the NEOSCC Region. This discussion begins with changes in the population.

#### POPULATION DYNAMICS

Table II.1 presents population counts in the NEOSCC Region, separated into the NOACA, NEFCO, and Eastgate regions, as drawn from the 2000 and 2010 Censuses and annual intercensal estimates. Of course, the NOACA Region was approximately twice as large as the NEFCO Region, which was in turn about twice as large as the Eastgate region. When reviewed over time, we see that the entire 12-county area experienced a population decline, falling by 3.1 percent from 2000 through 2012, but the NEFCO Region managed to continue to grow. Even though it declined in some years, 2012 saw a return to positive territory, as shown in Table II.1.

**Table II.1**  
**Population Estimates**

NEOSCC Region  
2000 & 2010 Census Data & Intercensal Estimates

Year	NOACA Region	NEFCO Region	Eastgate Region	NEOSCC Region
2000	2,148,143	1,184,622	585,399	3,918,164
2001	2,141,787	1,187,564	581,705	3,911,056
2002	2,136,201	1,189,084	578,059	3,903,344
2003	2,131,150	1,190,927	575,252	3,897,329
2004	2,122,934	1,191,714	572,013	3,886,661
2005	2,111,699	1,192,151	568,266	3,872,116
2006	2,099,415	1,192,876	564,637	3,856,928
2007	2,091,596	1,194,524	559,905	3,846,025
2008	2,085,110	1,195,051	555,589	3,835,750
2009	2,081,063	1,194,159	552,924	3,828,146
2010	2,077,240	1,193,306	550,632	3,821,178
2011	2,068,397	1,191,876	546,614	3,806,887
2012	2,063,535	1,191,978	542,940	3,798,453
<b>% Change 00–12</b>	<b>-3.9%</b>	<b>0.6%</b>	<b>-7.3%</b>	<b>-3.1%</b>

## POPULATION BY AGE

Data on population by age in 2000 and 2010 in the NEOSCC Region, presented in Table II.2, show that the largest population groups in both Census counts represented persons aged 35 to 54 and 5 to 19, which comprised 28.2 and 19.9 percent in 2010, respectively. This was also true when comparing the three other regions: these age groups were the largest. While most groups declined in absolute numbers, persons from the age of 20 to 24 rose 3.7 percent in the NEOSCC Region over the decade, and persons aged 55 to 64 shot up nearly 42 percent. This was even more pronounced in the NEFCO region, where persons in this age cohort rose by 46.7 percent over the decade. Persons the age of 65 or older rose too, but at a slower rate, 2.9 percent in the NEOSCC Region, with NEFCO rising at the highest rate, 8.2 percent over the decade.

**Table II.2**  
**Population by Age**

NEOSCC Region  
2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00-10
	Population	% of Total	Population	% of Total	
NOACA Region					
Under 5	141,425	6.6%	120,979	5.80%	-14.5%
5 to 19	455,720	21.2%	414,859	20.00%	-9.0%
20 to 24	116,580	5.4%	119,186	5.70%	2.2%
25 to 34	282,674	13.2%	242,552	11.70%	-14.2%
35 to 54	646,637	30.1%	592,558	28.50%	-8.4%
55 to 64	193,528	9.0%	271,394	13.10%	40.2%
65 or Older	311,579	14.5%	315,712	15.2%	1.3%
Total	2,148,143	100.0%	2,077,240	100.0%	-3.3%
NEFCO Region					
Under 5	77,288	6.5%	69,335	5.80%	-10.3%
5 to 19	253,861	21.4%	240,606	20.20%	-5.2%
20 to 24	73,956	6.2%	80,829	6.80%	9.3%
25 to 34	151,706	12.8%	136,450	11.40%	-10.1%
35 to 54	357,088	30.1%	332,019	27.80%	-7.0%
55 to 64	106,782	9.0%	156,615	13.10%	46.7%
65 or Older	163,941	13.8%	177,452	14.9%	8.2%
Total	1,184,622	100.0%	1,193,306	100.0%	0.7%
Eastgate Region					
Under 5	35,834	6.1%	30,782	5.60%	-14.1%
5 to 19	121,835	20.8%	105,200	19.10%	-13.7%
20 to 24	31,937	5.5%	30,787	5.60%	-3.6%
25 to 34	69,779	11.9%	59,240	10.80%	-15.1%
35 to 54	173,335	29.6%	151,840	27.60%	-12.4%
55 to 64	56,461	9.6%	77,587	14.10%	37.4%
65 or Older	96,218	16.4%	95,196	17.3%	-1.1%
Total	585,399	100.0%	550,632	100.0%	-5.9%
NEOSCC Region					
Under 5	254,547	6.5%	221,096	5.80%	-13.1%
5 to 19	831,416	21.2%	760,665	19.90%	-8.5%
20 to 24	222,473	5.7%	230,802	6.00%	3.7%
25 to 34	504,159	12.9%	438,242	11.50%	-13.1%
35 to 54	1,177,060	30.0%	1,076,417	28.20%	-8.6%
55 to 64	356,771	9.1%	505,596	13.20%	41.7%
65 or Older	571,738	14.6%	588,360	15.4%	2.9%
Total	3,918,164	100.0%	3,821,178	100.0%	-2.5%

More information regarding the elderly population was also collected from the 2000 and 2010 Census counts, as shown in Table II.3. While this group as a whole expanded by a modest 2.9 percent over the decade, the share of persons aged 85 years or older rose by more than 35 percent, from 67,103 people in 2000 to 90,906 in 2010. This particular age group tends to have a higher incidence of frailties, such as difficulties with activities of daily living (ADLs). Two or more ADLs can be interpreted as an individual with disabilities. Furthermore, the elderly population grew even more dramatically in both the NEFCO and Eastgate regions, rising 40.5 percent and 38.7 percent. Hence, the older disabled age cohort expanded quite rapidly in Northeast Ohio.

**Table II.3**  
**Elderly Population by Age**  
 NEOSCC Region  
 2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00-10
	Population	% of Total	Population	% of Total	
NOACA Region					
65 to 66	31,735	10.2%	36,553	11.6%	15.2%
67 to 69	47,062	15.1%	52,681	16.7%	11.9%
70 to 74	79,033	25.4%	69,533	22.0%	-12.0%
75 to 79	69,461	22.3%	57,658	18.3%	-17.0%
80 to 84	46,753	15.0%	49,725	15.8%	6.4%
85 or Older	37,535	12.0%	49,562	15.7%	32.0%
Total	311,579	100.0%	315,712	100.0%	1.3%
NEFCO Region					
65 to 66	17,076	10.4%	21,457	12.1%	25.7%
67 to 69	25,694	15.7%	29,815	16.8%	16.0%
70 to 74	42,646	26.0%	39,744	22.4%	-6.8%
75 to 79	36,505	22.3%	32,465	18.3%	-11.1%
80 to 84	23,270	14.2%	27,635	15.6%	18.8%
85 or Older	18,750	11.4%	26,336	14.8%	40.5%
Total	163,941	100.0%	177,452	100.0%	8.2%
Eastgate Region					
65 to 66	9,547	9.9%	10,771	11.3%	12.8%
67 to 69	14,439	15.0%	15,666	16.5%	8.5%
70 to 74	25,014	26.0%	20,740	21.8%	-17.1%
75 to 79	21,737	22.6%	17,535	18.4%	-19.3%
80 to 84	14,662	15.2%	15,476	16.3%	5.6%
85 or Older	10,819	11.2%	15,008	15.8%	38.7%
Total	96,218	100.0%	95,196	100.0%	-1.1%
NEOSCC Region					
65 to 66	58,358	10.2%	68,781	11.7%	17.9%
67 to 69	87,195	15.3%	98,162	16.7%	12.6%
70 to 74	146,693	25.7%	130,017	22.1%	-11.4%
75 to 79	127,703	22.3%	107,658	18.3%	-15.7%
80 to 84	84,685	14.8%	92,836	15.8%	9.6%
85 or Older	67,104	11.7%	90,906	15.5%	35.5%
Total	571,738	100.0%	588,360	100.0%	2.9%

## POPULATION BY RACE AND ETHNICITY

Between the 2000 and 2010 censuses, the total population in the NEOSCC Region declined, as noted previously. The racial and ethnic composition of the Region also changed, with a decline in the white population of 4.7 percent, an increase of 1.5 percent in the black population, as well as an increase of 37 percent in Asian persons. The Hispanic population also increased substantially, with a jump of nearly 42 percent, at the same time that the non-Hispanic population declined by 3.6 percent, as shown in Table II.4. Generally, these patterns existed in each of the three Regions as well, but the Hispanic population rose by 81.3 percent in the NEFCO Region, the fastest in all of the NEOSCC Region. The black population also rose by 9.1 in this region.

**Table II.4**  
**Population by Race and Ethnicity**  
 NEOSCC Region  
 2000 & 2010 Census SF1 Data

Race	2000 Census		2010 Census		% Change 00-10
	Population	% of Total	Population	% of Total	
NOACA Region					
White	1,634,927	76.1%	1,538,382	74.1%	-5.9%
Black	413,797	19.3%	416,528	20.1%	0.7%
American Indian	3,926	0.2%	4,056	0.2%	3.3%
Asian	30,350	1.4%	40,522	2.0%	33.5%
Native Hawaiian/ Pacific Islander	488	0.0%	398	0.0%	-18.4%
Other	31,125	1.4%	35,224	1.7%	13.2%
Two or More Races	33,530	1.6%	42,130	2.0%	25.6%
Total	2,148,143	100.0%	2,077,240	100.0%	-3.3%
Non-Hispanic	2,075,573	96.6%	1,979,107	95.3%	-4.6%
Hispanic	72,570	3.4%	98,133	4.7%	35.2%
NEFCO Region					
White	1,045,900	88.3%	1,028,157	86.2%	-1.7%
Black	105,416	8.9%	115,056	9.6%	9.1%
American Indian	2,466	0.2%	2,455	0.2%	-0.4%
Asian	11,686	1.0%	17,828	1.5%	52.6%
Native Hawaiian/ Pacific Islander	192	0.0%	284	0.0%	47.9%
Other	3,280	0.3%	5,302	0.4%	61.6%
Two or More Races	15,682	1.3%	24,224	2.0%	54.5%
Total	1,184,622	100.0%	1,193,306	100.0%	0.7%
Non-Hispanic	1,174,419	99.1%	1,174,808	98.4%	0.0%
Hispanic	10,203	0.9%	18,498	1.6%	81.3%
Eastgate Region					
White	508,446	86.9%	472,002	85.7%	-7.2%
Black	61,909	10.6%	58,436	10.6%	-5.6%
American Indian	973	0.2%	1,092	0.2%	12.2%
Asian	2,580	0.4%	3,041	0.6%	17.9%
Native Hawaiian/ Pacific Islander	121	0.0%	114	0.0%	-5.8%
Other	4,006	0.7%	5,175	0.9%	29.2%
Two or More Races	7,364	1.3%	10,772	2.0%	46.3%
Total	585,399	100.0%	550,632	100.0%	-5.9%
Non-Hispanic	573,673	98.0%	533,254	96.8%	-7.0%
Hispanic	11,726	2.0%	17,378	3.2%	48.2%
NEOSCC Region					
White	3,189,273	81.4%	3,038,541	79.5%	-4.7%
Black	581,122	14.8%	590,020	15.4%	1.5%
American Indian	7,365	0.2%	7,603	0.2%	3.2%
Asian	44,616	1.1%	61,391	1.6%	37.6%
Native Hawaiian/ Pacific Islander	801	0.0%	796	0.0%	-0.6%
Other	38,411	1.0%	45,701	1.2%	19.0%
Two or More Races	56,576	1.4%	77,126	2.0%	36.3%
Total	3,918,164	100.0%	3,821,178	100.0%	-2.5%
Non-Hispanic	3,823,665	97.6%	3,687,169	96.5%	-3.6%
Hispanic	94,499	2.4%	134,009	3.5%	41.8%

The geographic distribution of racial and ethnic minorities can vary significantly throughout an area. HUD has determined that an area demonstrates a disproportionate share of a particular population when the percentage of that population is 10 percentage points or more above the study area average. For example, the NEOSCC Region's black population represented 15.4

percent in 2010. If an area were to exceed 25.4 percent, then there would be a disproportionate share, or an overconcentration of such a population.

This analysis of racial and ethnic distribution was conducted by calculating race or ethnicity as the percentage of total population within each Census tract and then plotting the data on a geographic map for both 2000 and 2010. In this fashion, any over-concentrations of such populations can be seen, as well as the changes in such concentrations over time.

Map II.1 presents the distribution of the concentration of black persons in 2000, an average of 14.8 percent. Many Census tracts had extremely high concentrations of black residents, sometimes reaching as high as 100 percent. Most of these concentrations were in or near the more urbanized areas of the Region, such as Cleveland, Youngstown, or Akron.

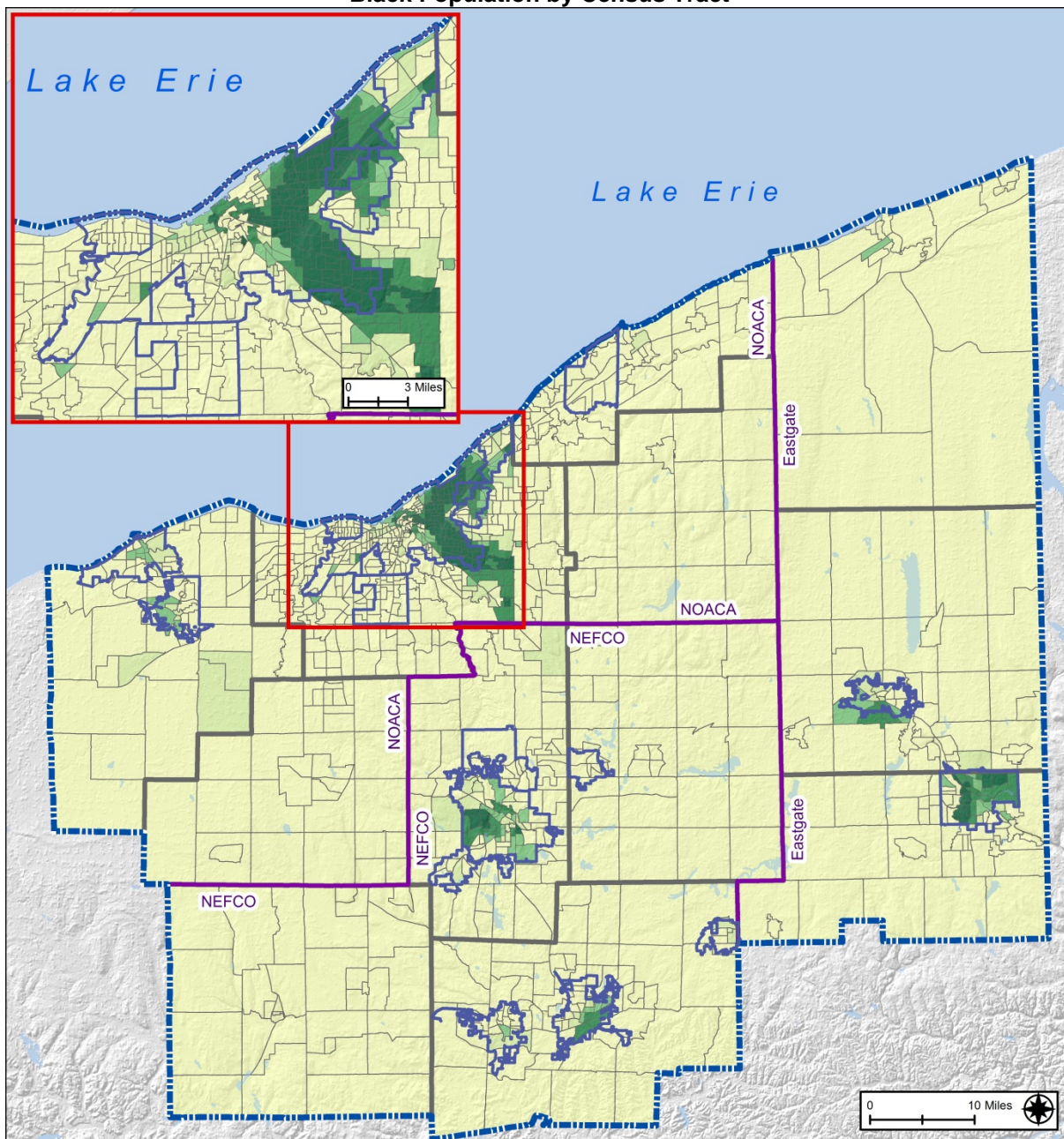
The black population rose slightly in percentage share over the decade, up to the 15.4 percent in 2010 shown previously. When examined by Census tract, 2010 Census data show more Census tracts with high concentrations of black persons than there were in 2000, suggesting that the concentration of the black population also increased, as shown in Map II.2.

Maps II.3 and II.4 present a similar set of special relationships for persons of Hispanic ethnicity as well. In 2000, the NEOSCC Region had a Hispanic population that comprised 2.4 percent of the total, with the remaining 97.6 percent as non-Hispanic. Hence, all Census tracts with a concentration over 12.4 percent could be construed to have an overconcentration of Hispanic persons, a disproportionate share. As can be seen therein, several areas were located in Lorain County, Cuyahoga County, Mahoning County and Lake County, although there were relatively fewer than seen with the black population.

The disproportionate share of Hispanic persons was calculated from the 2010 Census as well. Overall, we see a rise in the Hispanic population, rising to 3.5 percent of the region's population. Furthermore, several more Census tracts indicated that an overconcentration of the Hispanic population continued throughout the Region.



**Map II.1**  
**Black Population by Census Tract**



### LEGEND

#### 2000 Black Population Distribution

2000 Average Black Population Among All Census Tracts in the NEOSCC Region = 14.8%

Disproportionate Share Threshold = 24.8% (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.)

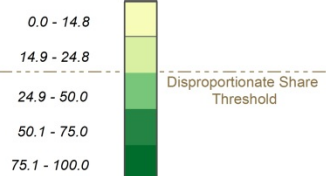
- Census Tract Boundaries
- Entitlement City Boundaries
- MPO/COG Boundaries

NEOSCC Boundary

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

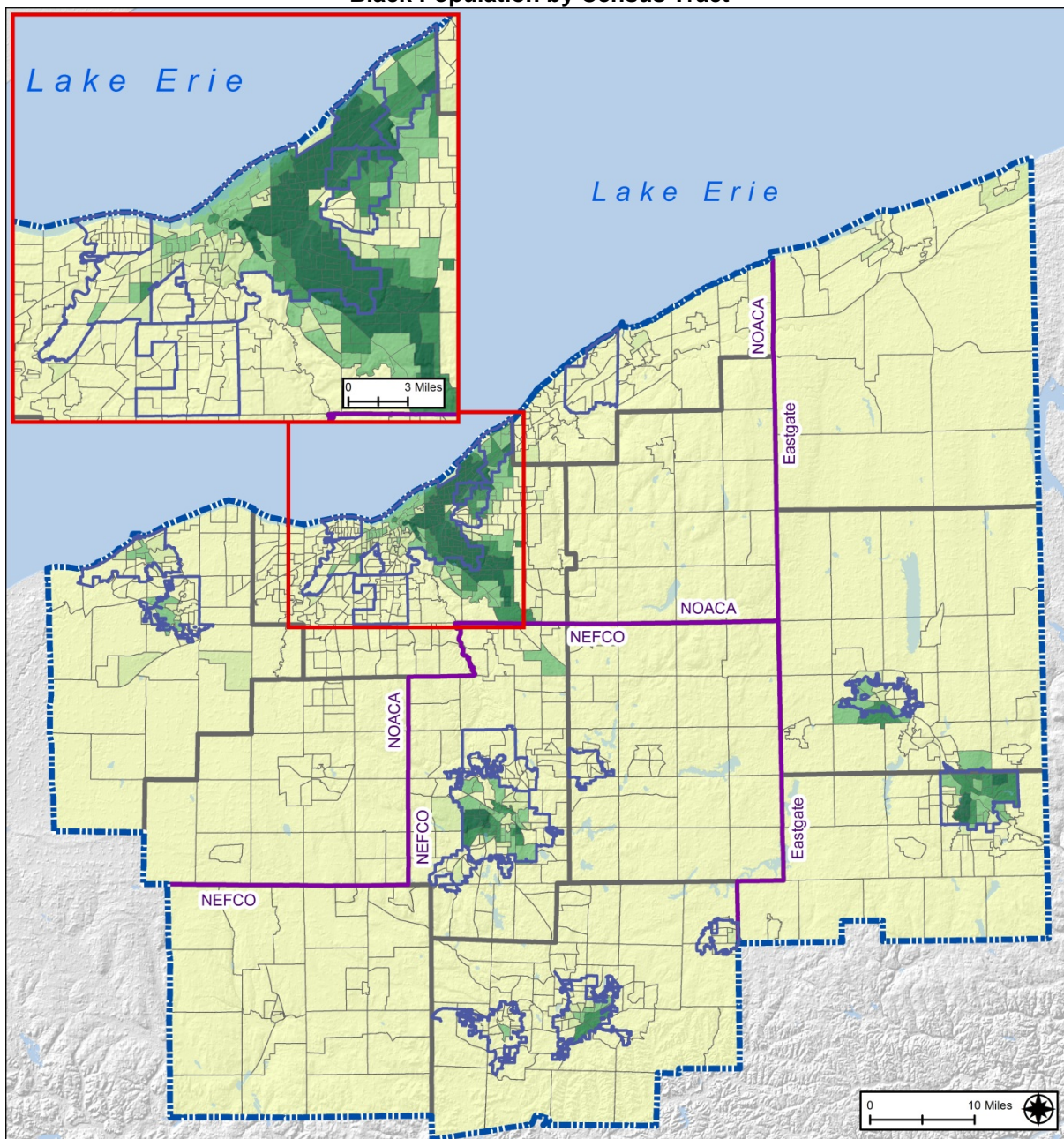
Data Source: 2000 Census

#### Percent Black





**Map II.2**  
**Black Population by Census Tract**



### LEGEND

#### 2010 Black Population Distribution

2010 Average Black Population Among All Census Tracts in the NEOSCC Region = 15.4%

Disproportionate Share Threshold = 25.4% (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.)

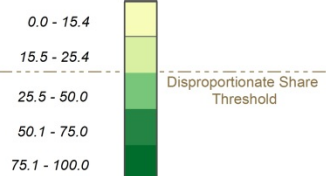
- Census Tract Boundaries
- Entitlement City Boundaries
- MPO/COG Boundaries

- NEOSCC Boundary

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

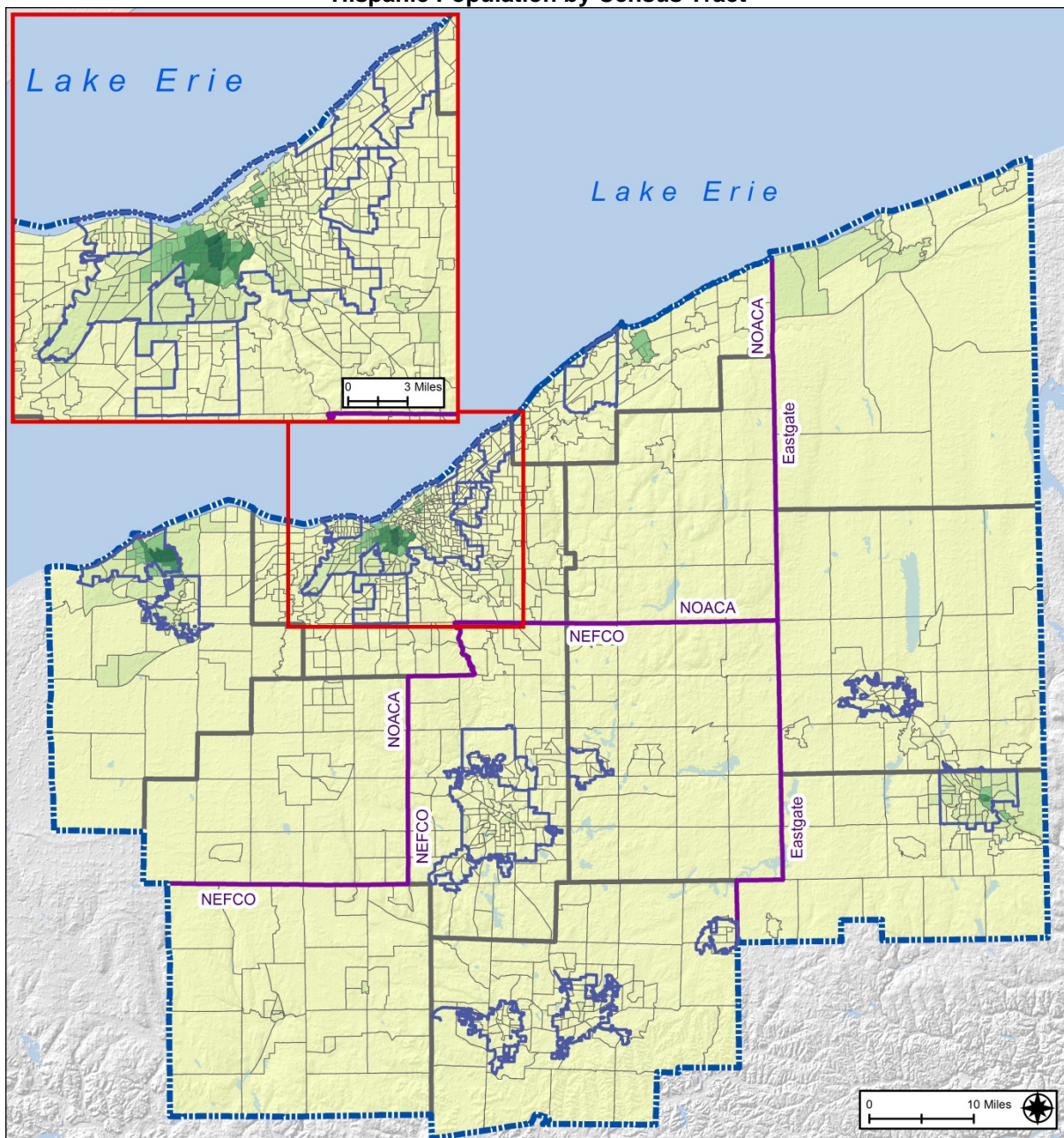
Data Source: 2010 Census

#### Percent Black





**Map II.3**  
**Hispanic Population by Census Tract**



### LEGEND

#### 2000 Hispanic Population Distribution

2000 Average Hispanic Population Among All Census Tracts in the NEOSCC Region = 2.4%

Disproportionate Share Threshold = 12.4% (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.)

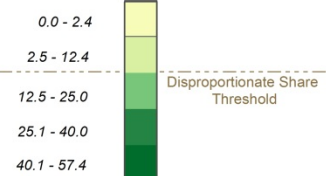
- Census Tract Boundaries
- Entitlement City Boundaries
- MPO/COG Boundaries

- NEOSCC Boundary

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

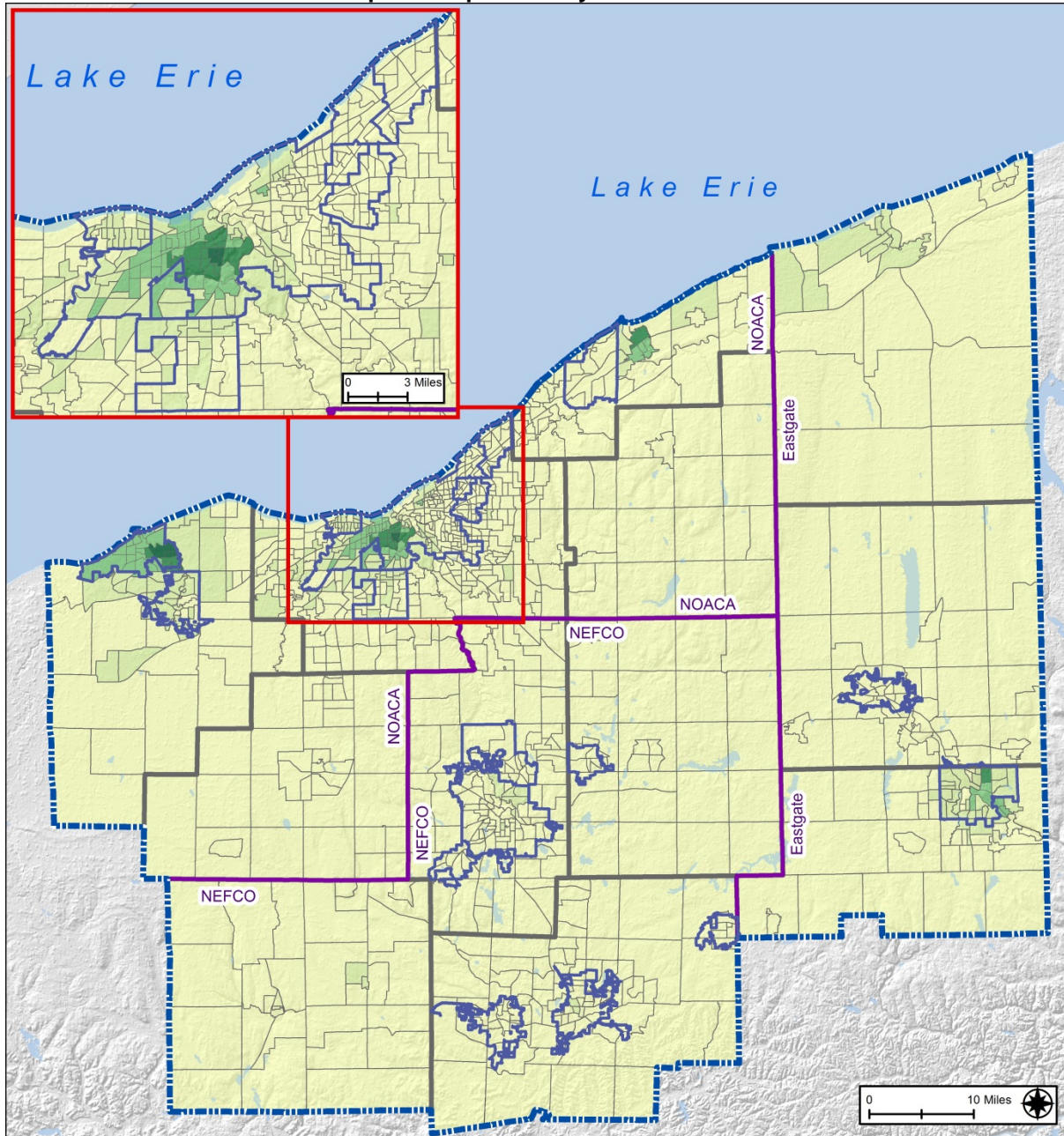
Data Source: 2000 Census

#### Percent Hispanic





**Map II.4**  
**Hispanic Population by Census Tract**



### LEGEND

#### 2010 Hispanic Population Distribution

2010 Average Hispanic Population Among All Census Tracts in the NEOSCC Region = 3.5%

Disproportionate Share Threshold = 13.5% (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.)

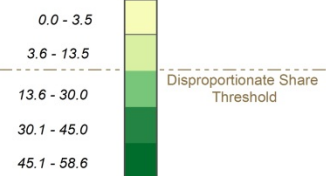
- Census Tract Boundaries
- Entitlement City Boundaries
- MPO/COG Boundaries

NEOSCC Boundary

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

Data Source: 2010 Census

#### Percent Hispanic



## DISABILITY STATUS

The Census Bureau defines disability as a lasting physical, mental, or emotional condition that makes it difficult for a person to conduct daily activities of living or impedes him or her from being able to go outside the home alone or to work.

Among all persons aged 5 years or younger, as indicated in the 2010 three-year ACS estimates, 13.3 percent of the NEOSCC Region population was disabled, with nearly 50 percent of all persons aged 75 or older with disabilities, as shown in Table II.5.

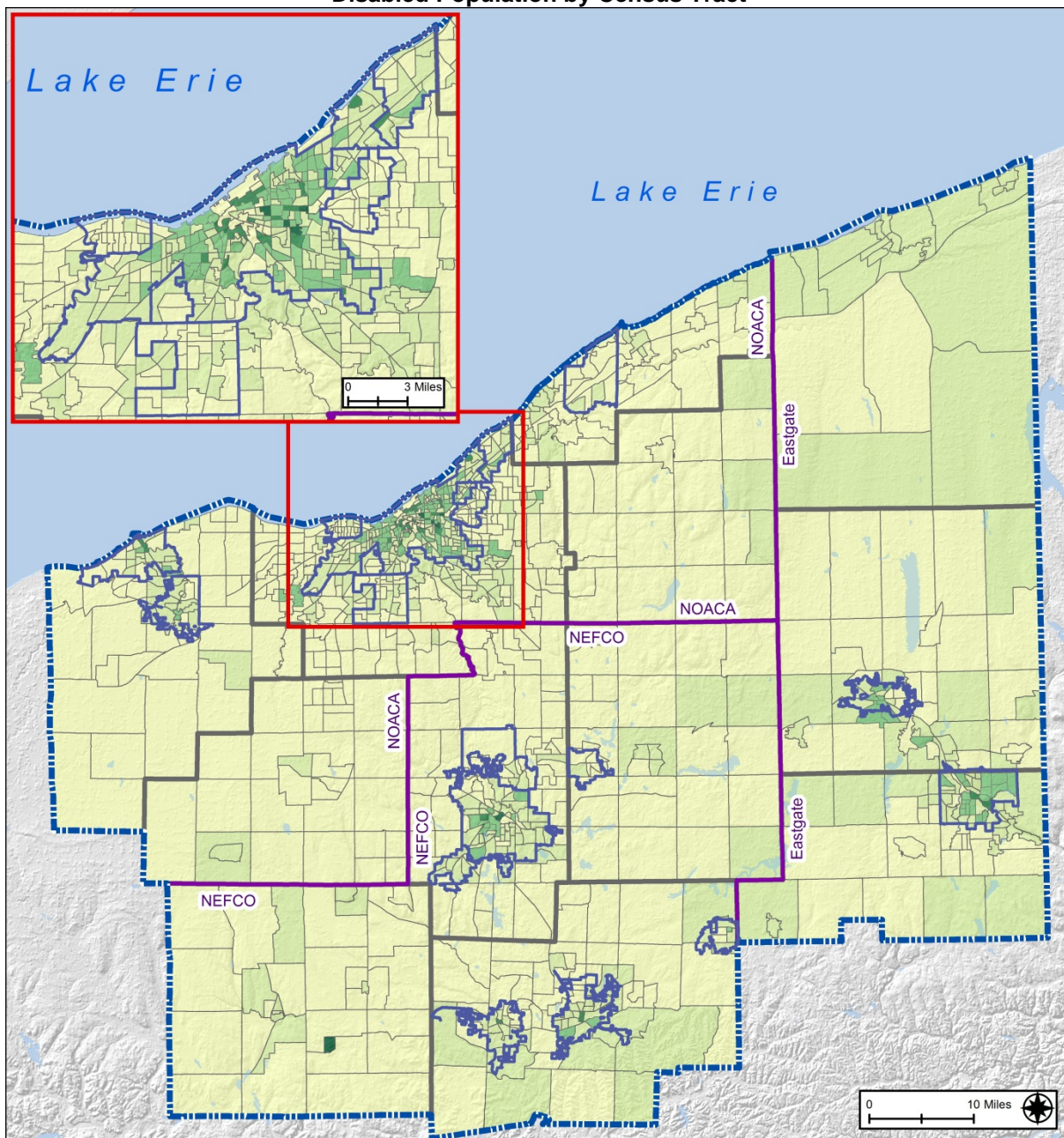
**Table II.5**  
**Disability by Age**  
NEOSCC Region  
2010 Three-Year ACS Data

Age	Male		Female		Total	
	Disabled Population	Disability Rate	Disabled Population	Disability Rate	Disabled Population	Disability Rate
Under 5	608	.5%	836	.8%	1,444	.6%
5 to 17	25,972	7.7%	15,201	4.7%	41,173	6.2%
18 to 34	26,987	7.2%	23,931	6.2%	50,918	6.7%
35 to 64	98,603	13.0%	107,266	13.2%	205,869	13.1%
65 to 74	32,456	24.8%	38,232	24.3%	70,688	24.5%
75 or Older	49,604	47.7%	82,416	49.9%	132,020	49.1%
<b>Total</b>	<b>234,230</b>	<b>12.9%</b>	<b>267,882</b>	<b>13.7%</b>	<b>502,112</b>	<b>13.3%</b>

Disability data from the ACS are not available by Census tract, as it is for a variety of other concepts, so geographic distribution of the disabled population in the NEOSCC Region as of the 2000 Census is presented in Map II.5.



**Map II.5**  
**Disabled Population by Census Tract**



### LEGEND

#### 2000 Disability Rate Distribution

2000 Average Disability Rate Among All Census Tracts in the NEOSCC Region = 18.3%

Disproportionate Share Threshold = 28.3% (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.)

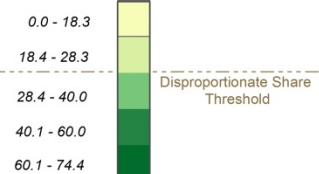
- Census Tract Boundaries
- Entitlement City Boundaries
- MPO/COG Boundaries

- NEOSCC Boundary

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

Data Source: 2000 Census

#### Disability Rate



## B. SEGREGATION AND INTEGRATION

As part of the data evaluation contained within a Fair Housing and Equity Assessment, a set of computations are designed to test for the presence and degree of segregation or integration. These are quantitative indices computed from the relative concentrations of selected classes or people within subsets of areas compared to the larger area. For example, to compute the segregation index for a county, one would evaluate all the Census tracts in the county. The result would give an indication of the relative segregation or integration that has occurred in that county.

While these indices can give a point-in-time view of the status of a particular area, more interesting are the changes that are going on in the NEOSCC Region and each of its counties. Three indices were computed: the diversity index, a measure of how even or uneven the population is distributed spatially within an area; the isolation index, a measure indicating whether a person of a particular group would meet a person of another group during their day; and the dissimilarity index, a measure of the uniformity, or lack thereof. In all cases, these indices range from 0 to 1 in value, with a value of 1 indicating total segregation and a value of 0 indicating total integration.

### DIVERSITY INDEX

Table II.6 presents the black/white and the Hispanic/Non-Hispanic diversity indices by county as calculated from the 2000 and 2010 decennial censuses. This quantitative measure represents the likelihood that two persons chose at random from the same area belong to different race or ethnic groups. Here, a value of 1 indicates that all tracts have the same composition of race or ethnicity as the larger area, and a value of 0 indicates that all tracts have only one population subgroup. In general, the more rural areas tended to have fewer minorities and lower rates of diversity. However, most counties experienced falling diversity index values over the last decade. This suggests that the trend in the NEOSCC Region is for a less diverse population.

The diversity index for Hispanic versus Non-Hispanic populations was more mixed across the Region, with the index declining over the decade and some other areas becoming more integrated.

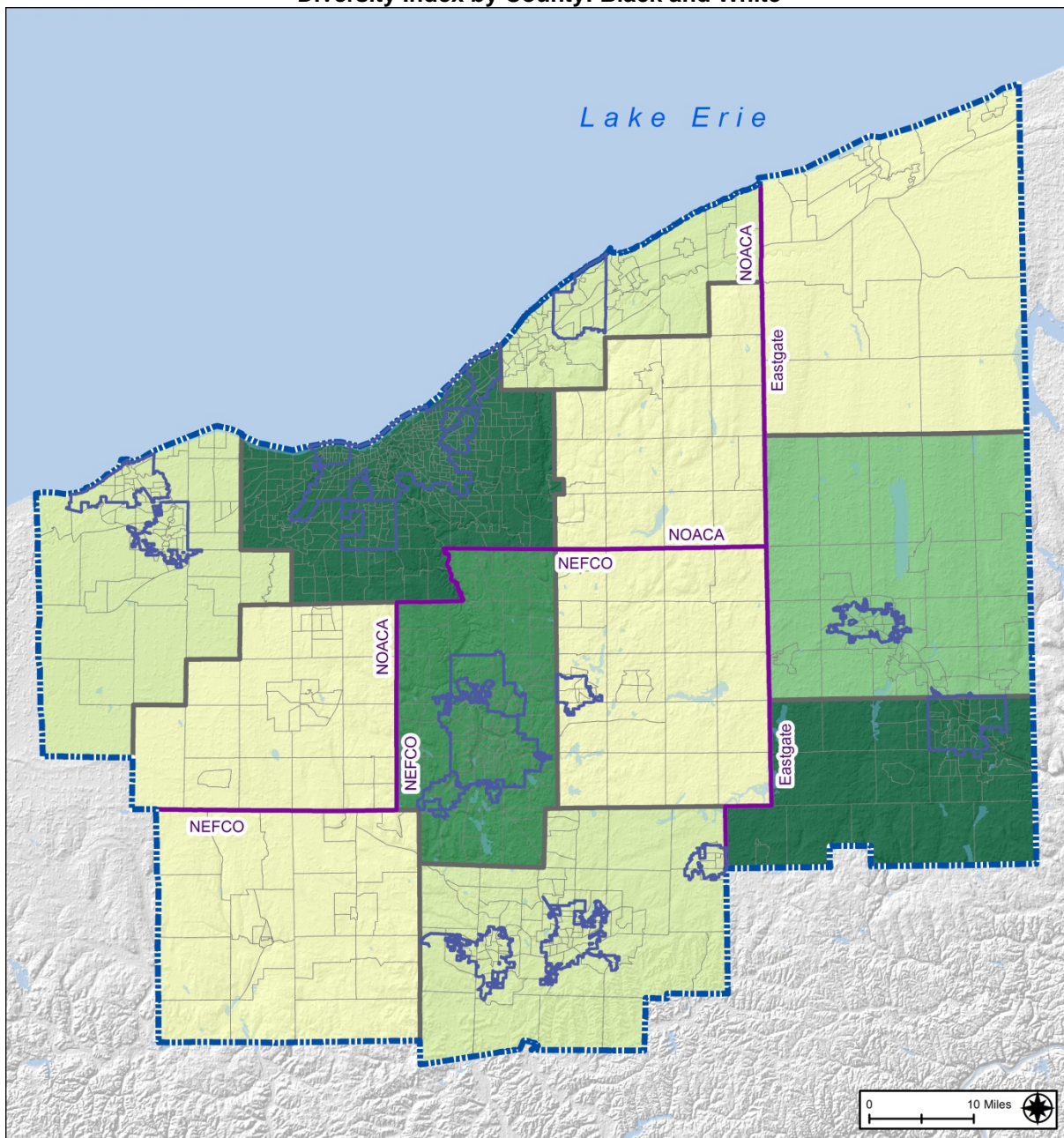
The diversity index for black and white persons for 2000 and 2010 is presented in Maps II.6 and II.7.

**Table II.6**  
**Diversity Indices**  
NEOSCC Region  
2000 and 2010 Census Data

County	Black-White		Hispanic-Non-Hispanic	
	2000	2010	2000	2010
Ashtabula	.16	.17	.09	.10
Cuyahoga	.63	.54	.23	.19
Geauga	.14	.10	.01	.02
Lake	.23	.19	.19	.20
Lorain	.25	.22	.22	.18
Mahoning	.54	.44	.12	.13
Medina	.10	.06	.01	.01
Portage	.13	.12	.02	.02
Stark	.29	.26	.02	.03
Summit	.43	.36	.02	.02
Trumbull	.33	.30	.02	.02
Wayne	.14	.11	.02	.03



**Map II.6**  
**Diversity Index by County: Black and White**



### LEGEND

#### 2000 Diversity Index by County: Black and White

A diversity index score of 0 represents perfectly even racial distribution; a score of 1 represents 100% composition of one race.

- Census Tract Boundaries
- Entitlement City Boundaries
- MPO/COG Boundaries

- NEOSCC Boundary

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

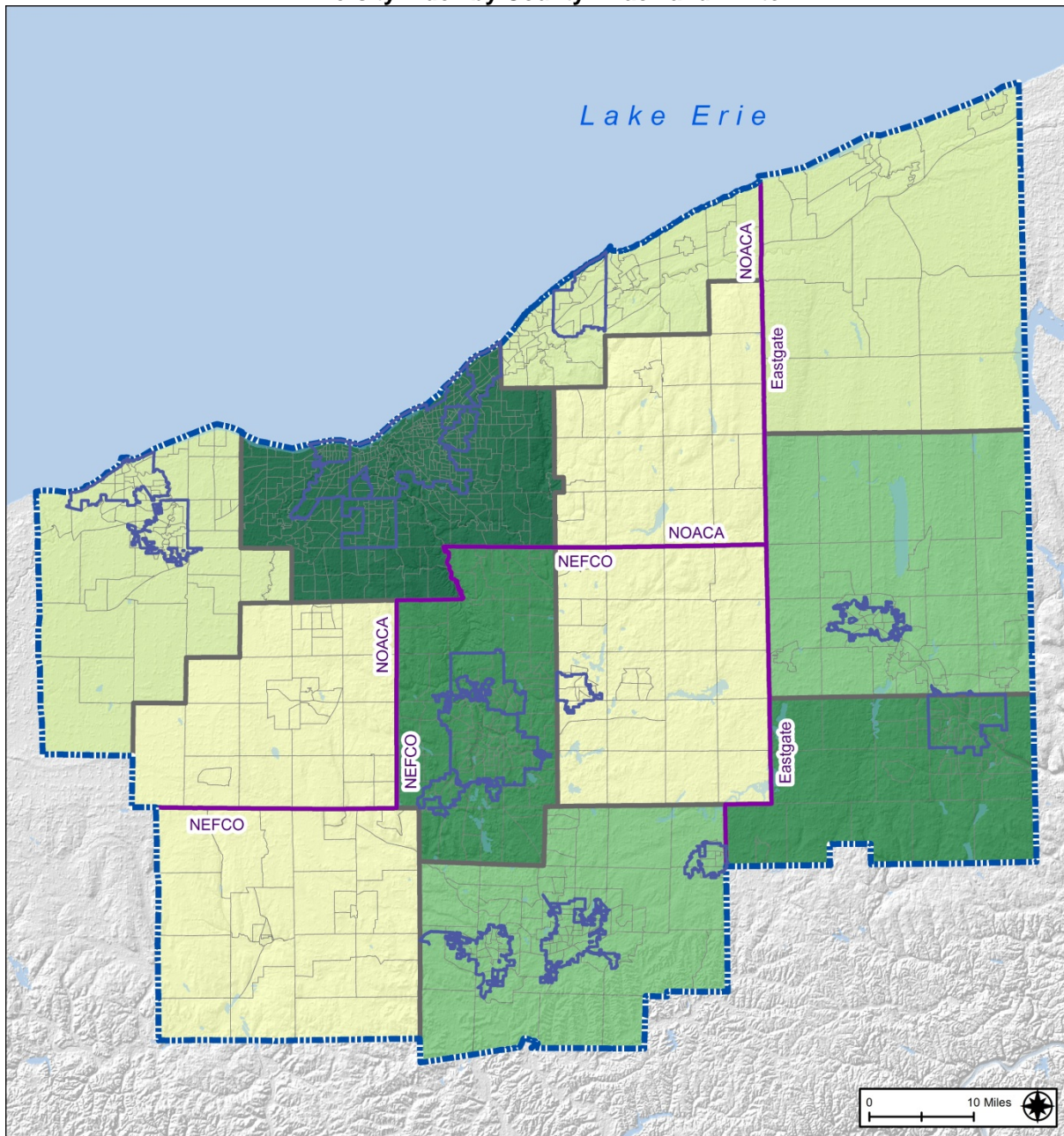
Data Source: 2000 Census

#### Diversity Index: Black/White

- 0.10 - 0.21
- 0.22 - 0.31
- 0.32 - 0.42
- 0.43 - 0.53
- 0.54 - 0.63



**Map II.7**  
**Diversity Index by County: Black and White**



### LEGEND

#### 2010 Diversity Index by County: Black and White

A diversity index score of 0 represents perfectly even racial distribution; a score of 1 represents 100% composition of one race.

- Census Tract Boundaries
- Entitlement City Boundaries
- MPO/COG Boundaries

- NEOSCC Boundary

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

Data Source: 2010 Census

#### Diversity Index: Black/White

- 0.06 - 0.16
- 0.17 - 0.25
- 0.26 - 0.35
- 0.36 - 0.45
- 0.46 - 0.54





## DISSIMILARITY INDEX

Another approach to measuring the level of segregation in a community is to compute the dissimilarity index. This index, computed at the Census tract level for each county in the NEOSCC Region, gives some idea as to the degree that segregation of black and white persons occurs within each county. Again, with a value of 1, an area is totally segregated and with a value of 0, an area is totally integrated. HUD PDR data documentation also provides some insight into what these particular statistics mean. HUD suggests that an index value of .40 or less indicates low segregation, a value of .41 to .54 indicates moderate segregation; and a value of .55 or more suggests high segregation.

As shown in Table II.7, in 2010, Cuyahoga, Mahoning, Summit, and Trumbull counties were all considered as highly segregated areas. Just Geauga and Medina counties were considered of low segregation. Still, the degree of segregation declined across all counties from 2000 to 2010.

A few communities also had relatively high Hispanic/Non-Hispanic Dissimilarity index values, such as Cuyahoga, Lorain, and Ashtabula counties. However, none can be considered as highly segregated for these persons; and, further all of the Hispanic/Non-Hispanic index values declined over the decade.

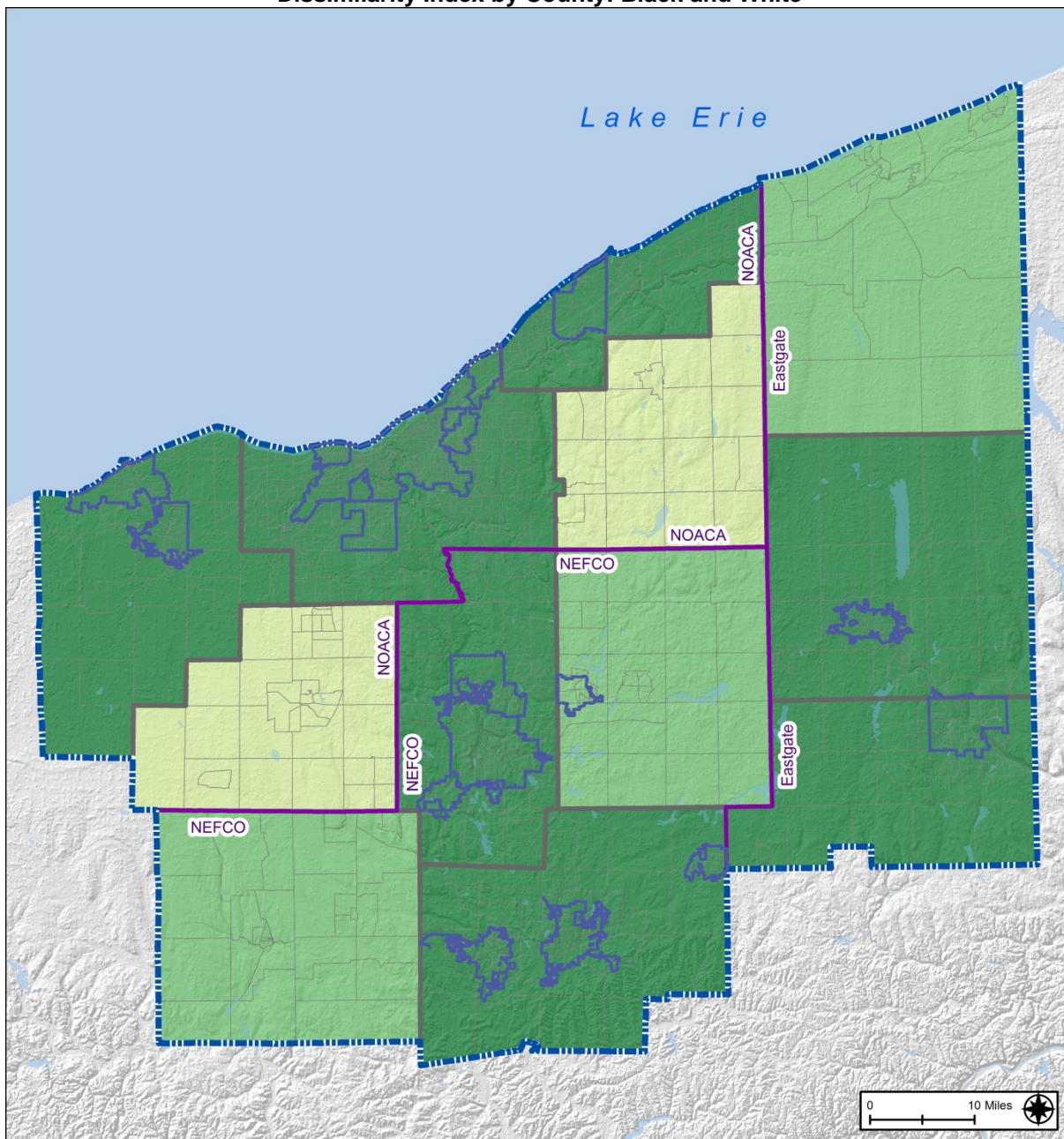
**Table II.7**  
**Dissimilarity Indices**  
NEOSCC Region  
2000 and 2010 Census Data

County	Black-White		Hispanic-Non Hispanic	
	2000	2010	2000	2010
Ashtabula	.46	.50	.42	.40
Cuyahoga	.79	.71	.54	.49
Gauga	.39	.34	.15	.17
Lake	.60	.54	.51	.51
Lorain	.55	.52	.55	.49
Mahoning	.78	.70	.39	.40
Medina	.39	.32	.17	.16
Portage	.46	.42	.19	.20
Stark	.58	.54	.16	.19
Summit	.67	.60	.20	.18
Trumbull	.64	.61	.17	.18
Wayne	.53	.47	.16	.22

The Black/White Dissimilarity Indices for 2000 and 2010 are presented in Maps II.8 and II.9.



**Map II.8**  
**Dissimilarity Index by County: Black and White**



## LEGEND

### 2000 Dissimilarity Index by County: Black and White

A dissimilarity index score of 0 indicates no difference in racial composition among the tracts as compared to the county; a score of 1 represents complete segregation as compared to the county.

- Census Tract Boundaries
- Entitlement City Boundaries
- MPO/COG Boundaries

- NEOSCC Boundary

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

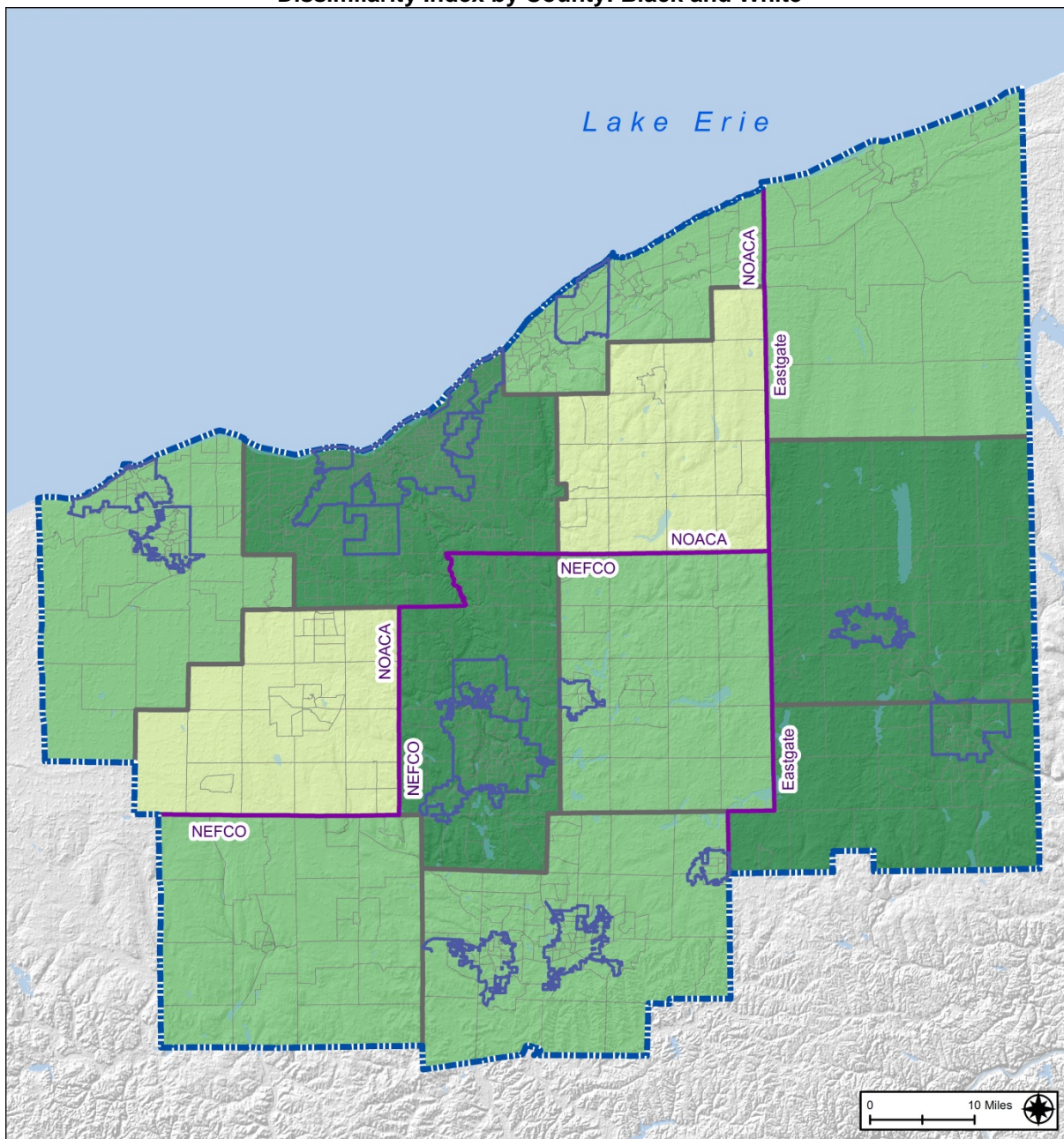
Data Source: 2000 Census

Dissimilarity Index:  
Black/White

- Low Segregation - 0.0 - 0.40
- Moderate Segregation - 0.41 - 0.54
- High Segregation - 0.55 - 0.79



**Map II.9**  
**Dissimilarity Index by County: Black and White**



### LEGEND

#### 2010 Dissimilarity Index by County: Black and White

A dissimilarity index score of 0 indicates no difference in racial composition among the tracts as compared to the county; a score of 1 represents complete segregation as compared to the county.

- Census Tract Boundaries
- Entitlement City Boundaries
- MPO/COG Boundaries

- NEOSCC Boundary

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

Data Source: 2010 Census

Dissimilarity Index:  
Black/White

- Low Segregation - 0.0 - 0.40
- Moderate Segregation - 0.41 - 0.54
- High Segregation - 0.55 - 0.71





## ISOLATION INDEX

The last measure of segregation presented in this study is the isolation index. It represents the propensity for a minority member to be exposed only to other minority members when leaving the house, with higher values representing greater isolation, and hence more segregation. Table II.8 presents the isolation index values for each county in the NEOSCC Region.

The degree of isolation was rather high for black persons in a few counties, chiefly Cuyahoga, Mahoning, and Summit, with values of .7, .5, and .44. The isolation index for Hispanic persons was quite low, meaning that there was very little isolation for Hispanic persons in the NEOSCC Region, with the most experienced in Lorain County.

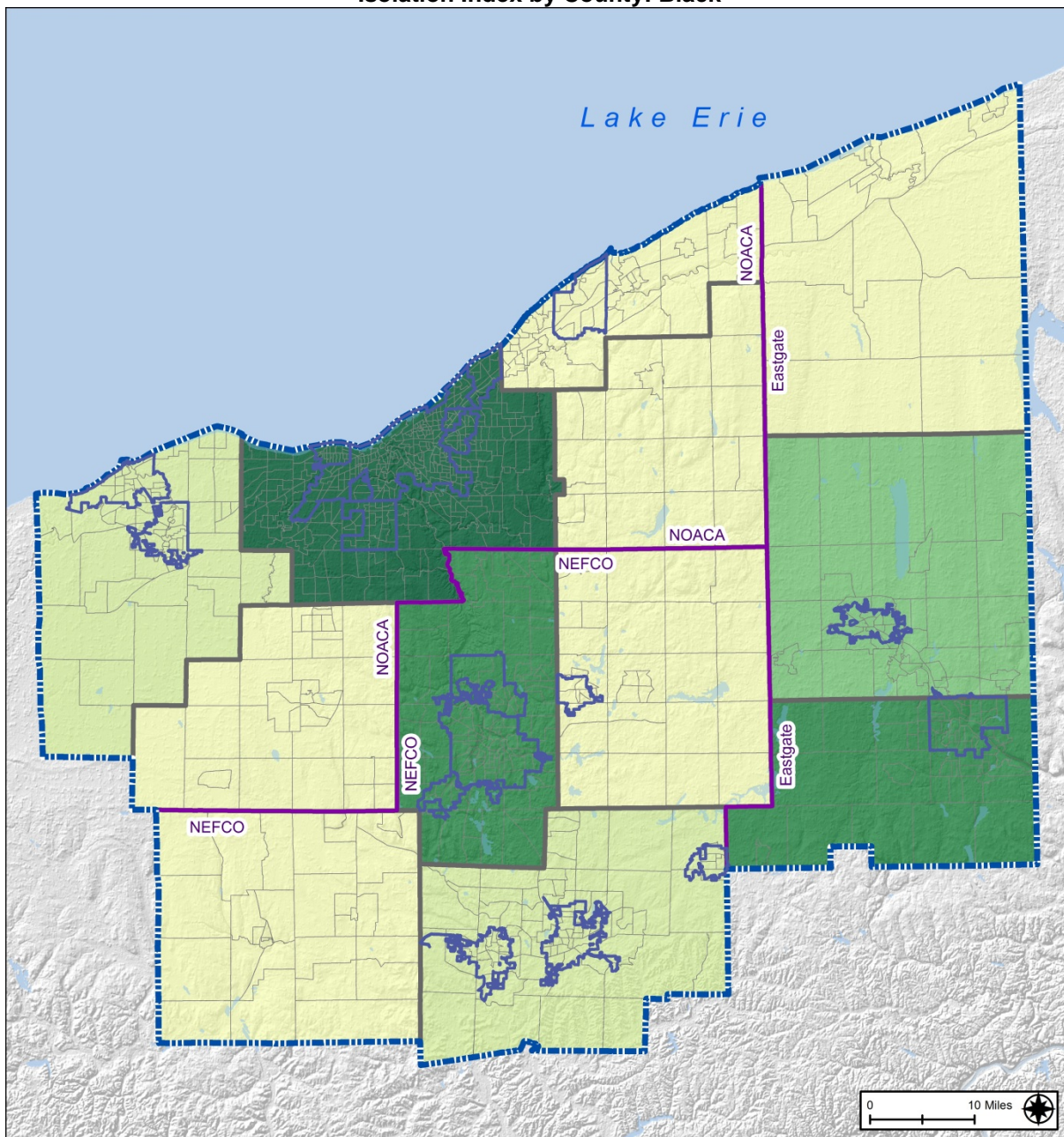
**Table II.8**  
**Isolation Indices**  
NEOSCC Region  
2000 and 2010 Census Data

County	Black		Hispanic	
	2000	2010	2000	2010
Ashtabula	.10	.11	.05	.07
Cuyahoga	.75	.70	.17	.17
Geauga	.06	.04	.01	.01
Lake	.10	.10	.09	.15
Lorain	.21	.20	.22	.22
Mahoning	.60	.50	.09	.12
Medina	.03	.02	.01	.02
Portage	.07	.08	.01	.02
Stark	.28	.25	.01	.02
Summit	.48	.44	.01	.02
Trumbull	.33	.29	.01	.02
Wayne	.04	.03	.01	.02

Geographic maps presenting these data have also been prepared and are presented in Maps II.10 through II.13.

The results of this segregation analysis indicates that for black persons, there was a considerable level of segregation in the NEOSCC Region and that the Hispanic population was somewhat segregated.

**Map II.10**  
**Isolation Index by County: Black**



### LEGEND

#### 2000 Black Isolation Index by County

An isolation index score of 1 indicates that a black person has a 100% chance of encountering only black persons. A score of 0 indicates that a black person has a 0% chance of encountering a black person.

- Census Tract Boundaries
- Entitlement City Boundaries
- MPO/COG Boundaries

- NEOSCC Boundary

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

Data Source: 2000 Census

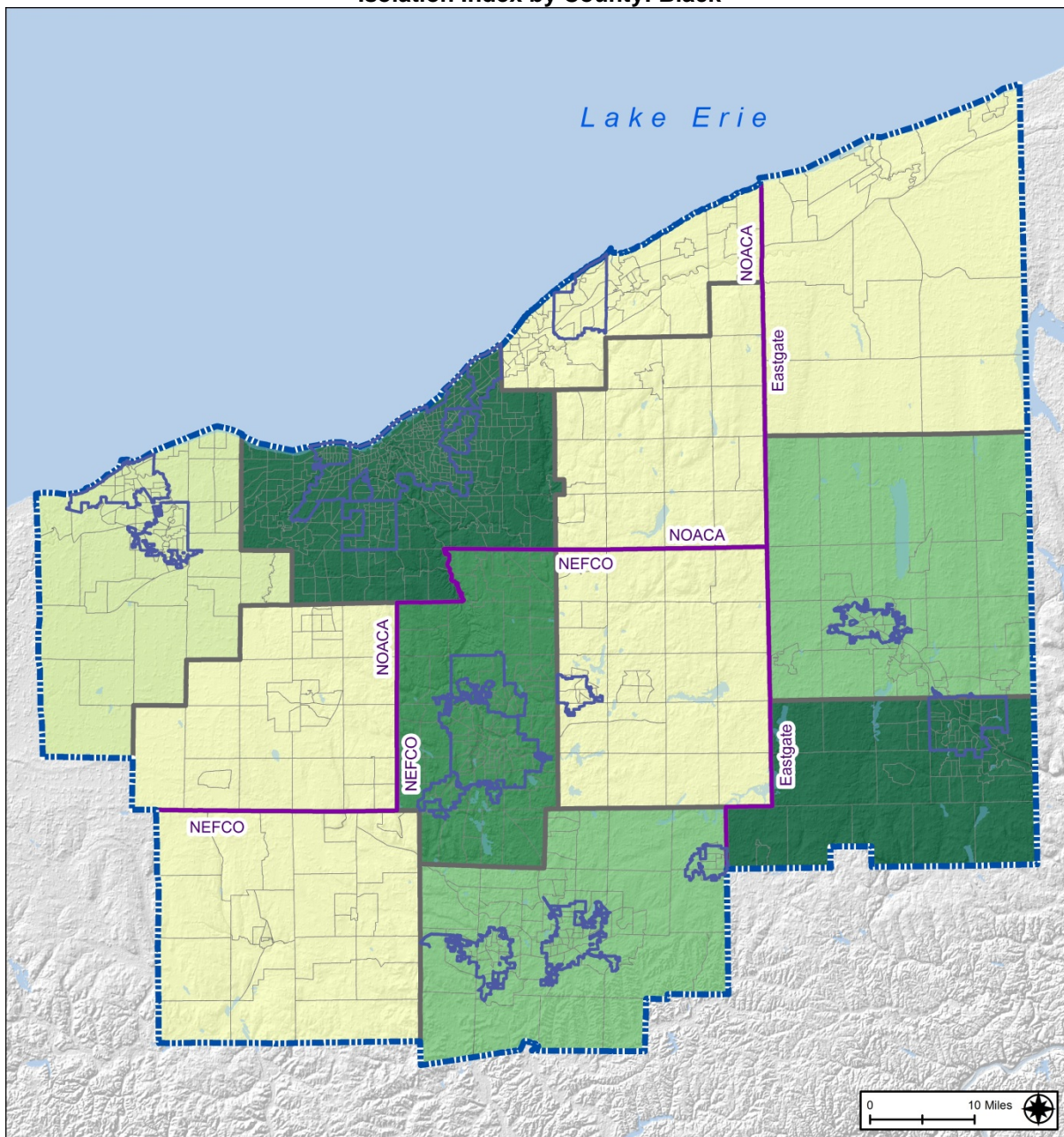
#### Isolation Index (Black)

- 0.03 - 0.17
- 0.18 - 0.32
- 0.33 - 0.46
- 0.47 - 0.61
- 0.62 - 0.75





**Map II.11**  
**Isolation Index by County: Black**



### LEGEND

#### 2010 Black Isolation Index by County

An isolation index score of 1 indicates that a black person has a 100% chance of encountering only black persons. A score of 0 indicates that a black person has a 0% chance of encountering a black person.

- Census Tract Boundaries
- Entitlement City Boundaries
- MPO/COG Boundaries

NEOSCC Boundary

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

Data Source: 2010 Census

#### Isolation Index (Black)

0.01 - 0.09

0.10 - 0.17

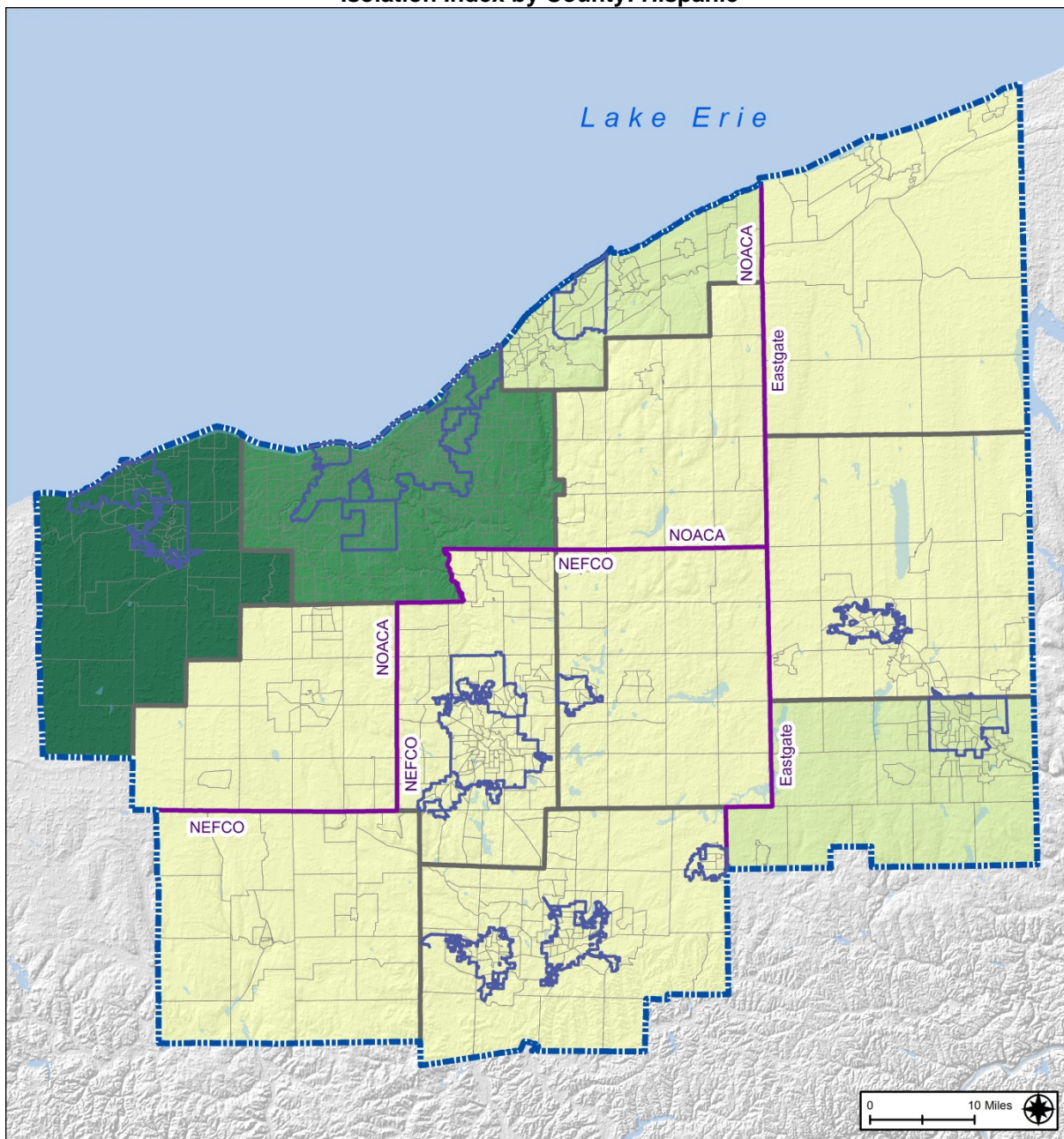
0.18 - 0.24

0.25 - 0.32

0.33 - 0.40






**Map II.12**  
**Isolation Index by County: Hispanic**



### LEGEND

#### 2000 Hispanic Isolation Index by County

An isolation index score of 1 indicates that a Hispanic person has a 100% chance of encountering only Hispanic persons. A score of 0 indicates that a Hispanic person has a 0% chance of encountering a Hispanic person.

-  Census Tract Boundaries
-  Entitlement City Boundaries
-  MPO/COG Boundaries

-  NEOSCC Boundary

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

Data Source: 2000 Census

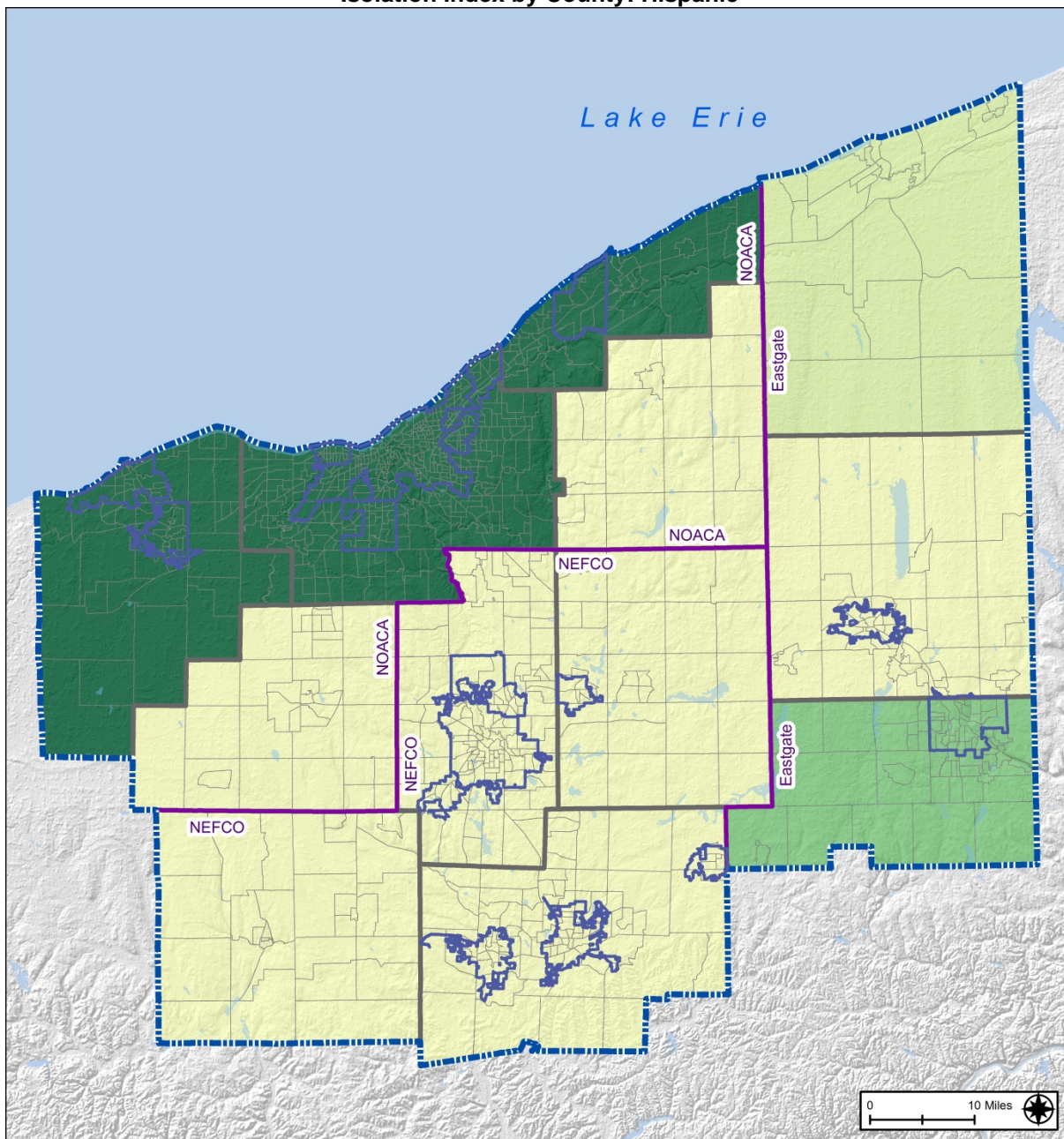
#### Isolation Index (Hispanic)

- 0.01 - 0.05
- 0.06 - 0.09
- 0.10 - 0.14
- 0.15 - 0.18
- 0.19 - 0.22





**Map II.13**  
**Isolation Index by County: Hispanic**



### LEGEND

#### 2010 Hispanic Isolation Index by County

An isolation index score of 1 indicates that a Hispanic person has a 100% chance of encountering only Hispanic persons. A score of 0 indicates that a Hispanic person has a 0% chance of encountering a Hispanic person.

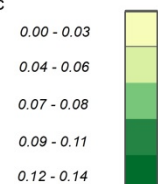
- Census Tract Boundaries
- Entitlement City Boundaries
- MPO/COG Boundaries

- NEOSCC Boundary

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

Data Source: 2010 Census

#### Isolation Index (Hispanic)



### ***Historic Patterns of Racial and Ethnic Concentrations in Housing***

While the reasons for high proportions of racial and ethnic minorities in particular tracts are numerous and varied, examination of the historical context for segregation and integration in the Region is essential for understanding areas of opportunity in current and future contexts. As the geographic maps discussed previously suggest, heavy concentrations of black persons in particular exist in the Region, particularly in the larger cities.

Several examples of public and private sector influences on housing choice for black families exist in the Region. In what is now referred to as the Great Migration, almost a half-million blacks moved from the southern United States to the north between the years of 1910-1940. In the 1920s alone, Cleveland's black population more than doubled.<sup>6</sup> While this influx provided Cleveland—as well as Ohio's other industrial centers, including Youngstown and Akron—with workers, the migration also placed an enormous strain on the housing market. The increasing concentration of blacks was often taken advantage of by landlords who charged black tenants higher rates than whites. Furthermore, for many black persons, the suburban housing market was simply too expensive, while those who did try to establish themselves in the suburbs faced hostile reactions.<sup>7</sup>

The lack of suitable housing options for black residents was further compounded in the 1930s when public housing officials, influenced by the banking industry expectation that racially integrated communities were unhealthy neighborhoods and destined for declining property values, began construction of segregated housing developments. These new constructions often created unequal opportunity for black families; black residents of a particularly disastrous housing project in Cleveland found themselves surrounded by a city dump, and paying 200%-300% more in rent than families living in a white housing development that boasted numerous amenities and was located near the downtown area.<sup>8</sup>

In Cleveland, urban renewal efforts of the 1950s attempted to improve conditions of many inner-city neighborhoods, and aimed to tear down homes and relocate “Negro families with minimal trouble.” Officials agreed that the only place to relocate these displaced families was in existing black neighborhoods, thus reinforcing established segregation.<sup>9</sup>

The Great Migration into northern cities slowed and the black population stabilized in the 1970s and 1980s. By this time, however, Cleveland was the most segregated major metropolitan area in the U.S. and possessed comparatively few stable, integrated tracts.<sup>10</sup> The poorer, minority race areas expanded into East Cleveland, and other suburbs such as Shaker Heights and Cleveland Heights also absorbed some of the black residents by the 1970s. Public and private sector policies influenced these patterns.

In another example, in the 1990s policies and practices in Parma had the effect of excluding black persons from living in the city, even after HUD determined almost 3,000 units of low-income housing would be needed to remedy these discriminatory tactics. However, the

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<sup>6</sup> (Kusner 1976) *A Ghetto Takes Shape*, p.

<sup>7</sup> Keer 2011) *Derelict Paradise*, p.

<sup>8</sup> Keer 2011) *Derelict Paradise*, p 133.

<sup>9</sup> (Keer 2011) *Derelict Paradise*, p.

<sup>10</sup> (Galster 1987) *The Ecology of Racial Discrimination in Housing: An Exploratory Model*



legislature failed to support this effort, effectively stopping these integration efforts in Parma.<sup>11</sup> These occurrences unfortunately represent common examples of uses of urban renewal and public housing efforts in the U.S.

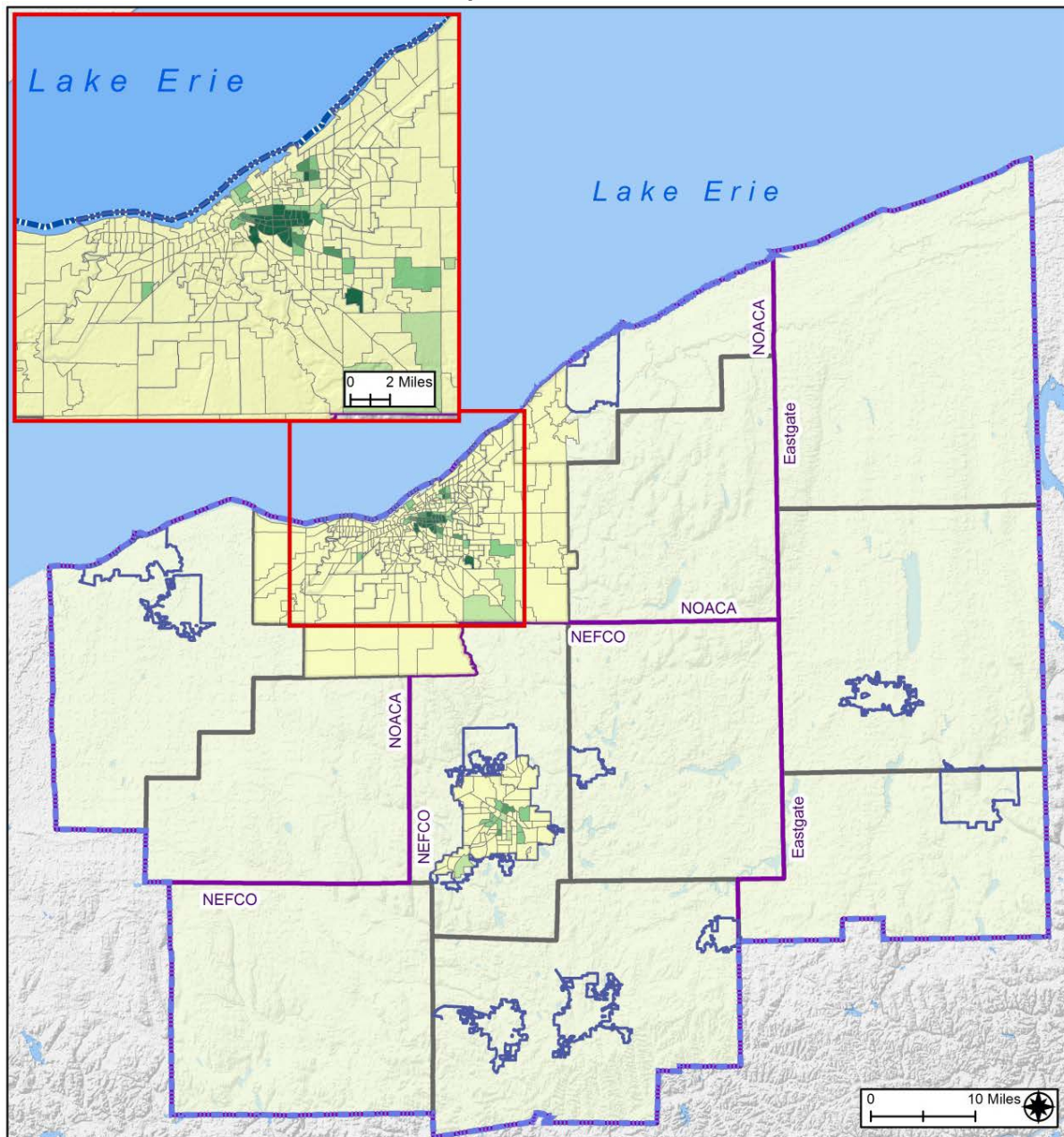
To help visualize patterns of racial distribution in the region during this time, race was calculated as the percentage of total population within each Census tract and then the data was plotted on a geographic map for the years of 1950, 1960, 1970, 1980, and 1990. In this fashion, any over-concentrations of non-white populations can be seen, as well as the changes in such concentrations over time.

Maps II.14 - II.18 present the distribution of the concentration of non-white persons between the years of 1950-1990. During this time the average non-white population among the census tracts of the region grew from 9.1% in 1950 to 20.2% to 1990. For all years, many Census tracts had extremely high concentrations of black residents, sometimes reaching as high as 100 percent. Most of these concentrations were in or near the more urbanized areas of the Region, such as Cleveland, Youngstown, or Akron.

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<sup>11</sup> (Carey 1997) *The Need for Community-Based Housing Development in Integration Efforts*

**Map II.14**  
**Non-White Population Distribution: 1950**



### LEGEND

#### 1950 Non-White Population Distribution

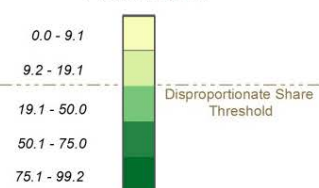
1950 Average Non-White Population Among All Census Tracts in the NEOSCC Region = 9.1%  
 Disproportionate Share Threshold = 19.1% (A disproportionate share exists when the share of a population in a given area is at least 10 percentage points greater than the study area average.)

- Entitlement City Boundaries
- NEOSCC Boundary
- No Data Available

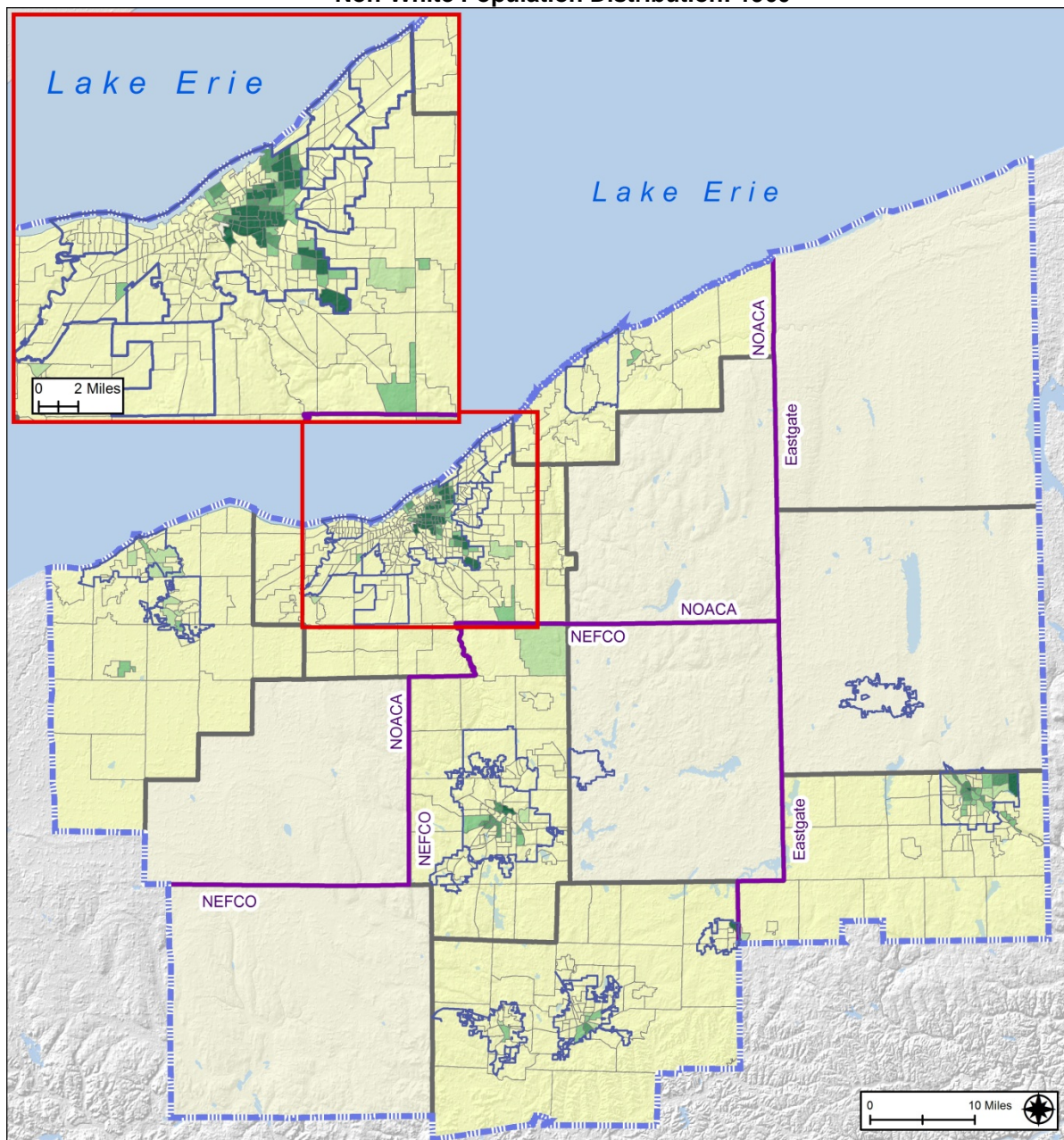
NOTE: The Counties of Cuyahoga, Lake, Stark, and Summit are also entitlement areas.

Data Source: 1950 Census, NHGIS

#### Percent Black



**Map II.15**  
**Non-White Population Distribution: 1960**



## LEGEND

### 1960 Non-White Population Distribution

1960 Average Non-White Population Among All Census Tracts in the NEOSCC Region = 12.3%

Disproportionate Share Threshold = 22.3% (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.)

- Entitlement City Boundaries
- NEOSCC Boundary
- No Data Available

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

Data Source: 1960 Census, NHGIS

### Percent Non-White

0.0 - 12.3

12.4 - 22.3

22.4 - 50.0

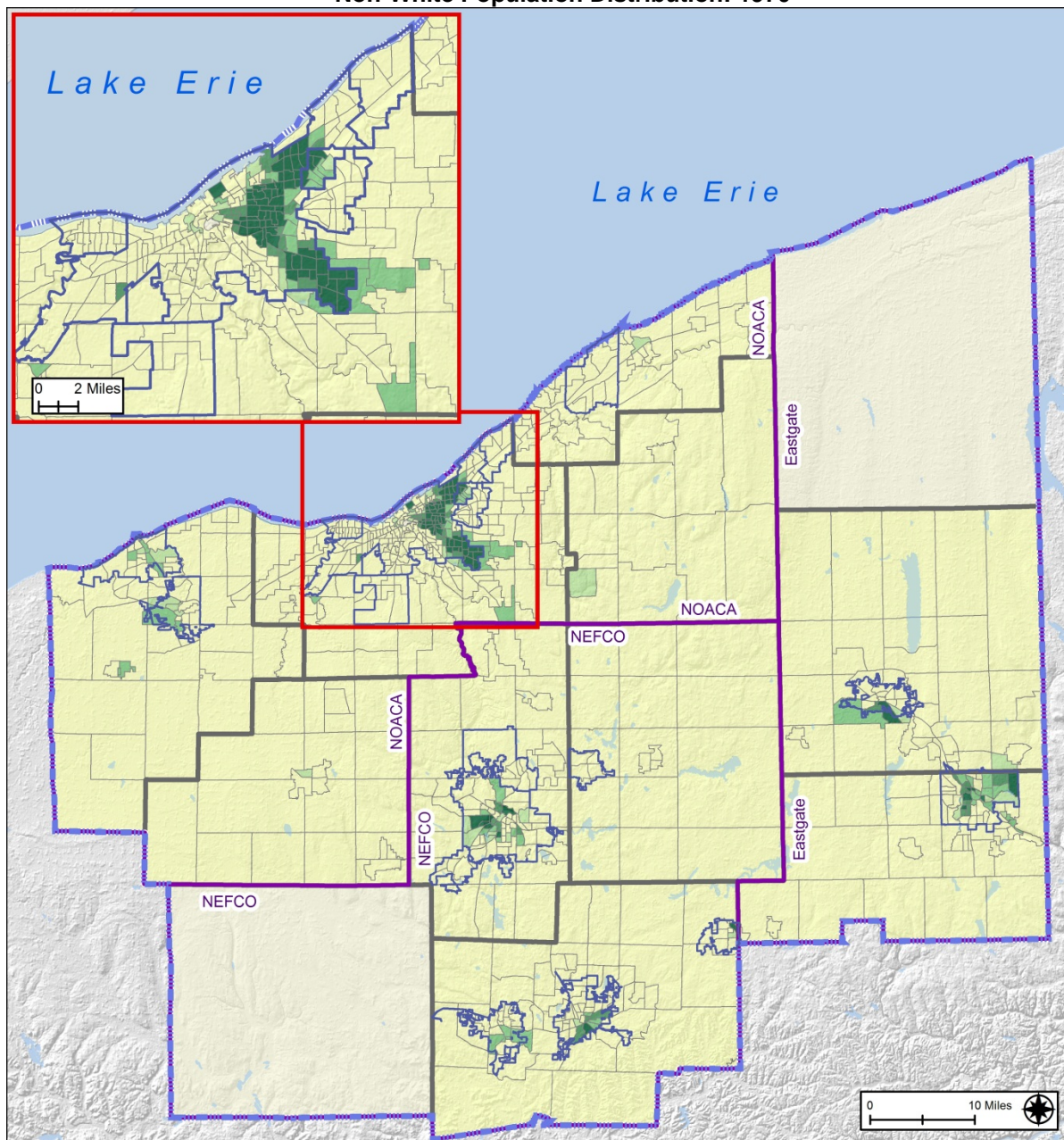
50.1 - 75.0

75.1 - 99.9

Disproportionate Share Threshold



**Map II.16**  
**Non-White Population Distribution: 1970**



## LEGEND

### 1970 Non-White Population Distribution

1970 Average Non-White Population Among All Census Tracts in the NEOSCC Region = 14.8%

Disproportionate Share Threshold = 24.8% (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.)

- Entitlement City Boundaries
- NEOSCC Boundary
- No Data Available

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

Data Source: 1970 Census, NHGIS

### Percent Non-White

0.0 - 14.8

14.9 - 24.8

24.9 - 50.0

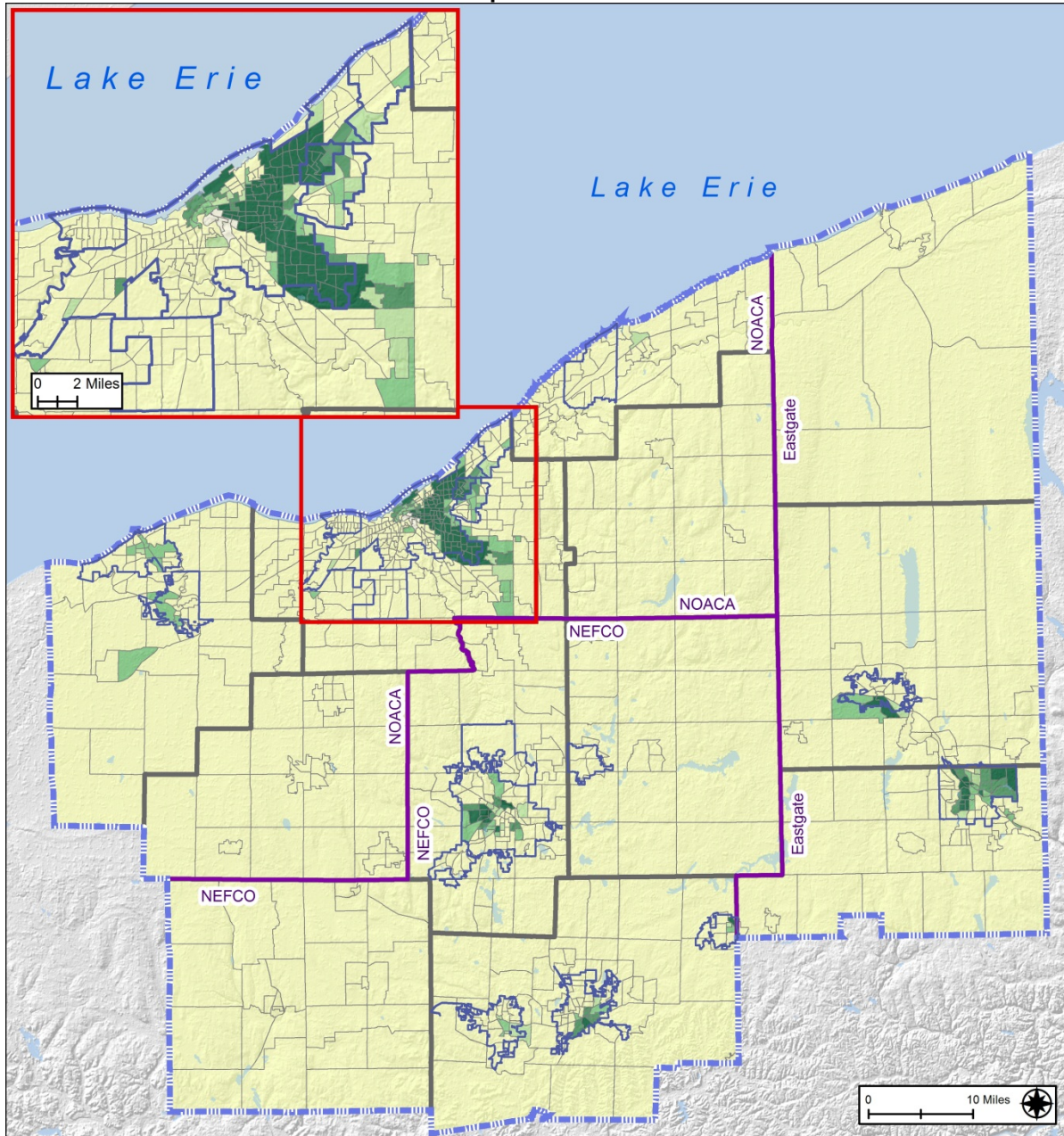
50.1 - 75.0

75.1 - 99.9

Disproportionate Share Threshold



**Map II.17**  
**Non-White Population Distribution: 1980**



## LEGEND

### 1980 Non-White Population Distribution

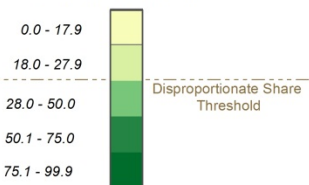
1980 Average Non-White Population Among All Census Tracts in the NEOSCC Region = 17.9%  
 Disproportionate Share Threshold = 27.9% (A disproportionate share exists when the share of a population in a given area is at least 10 percentage points greater than the study area average.)

Entitlement City Boundaries NEOSCC Boundary

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

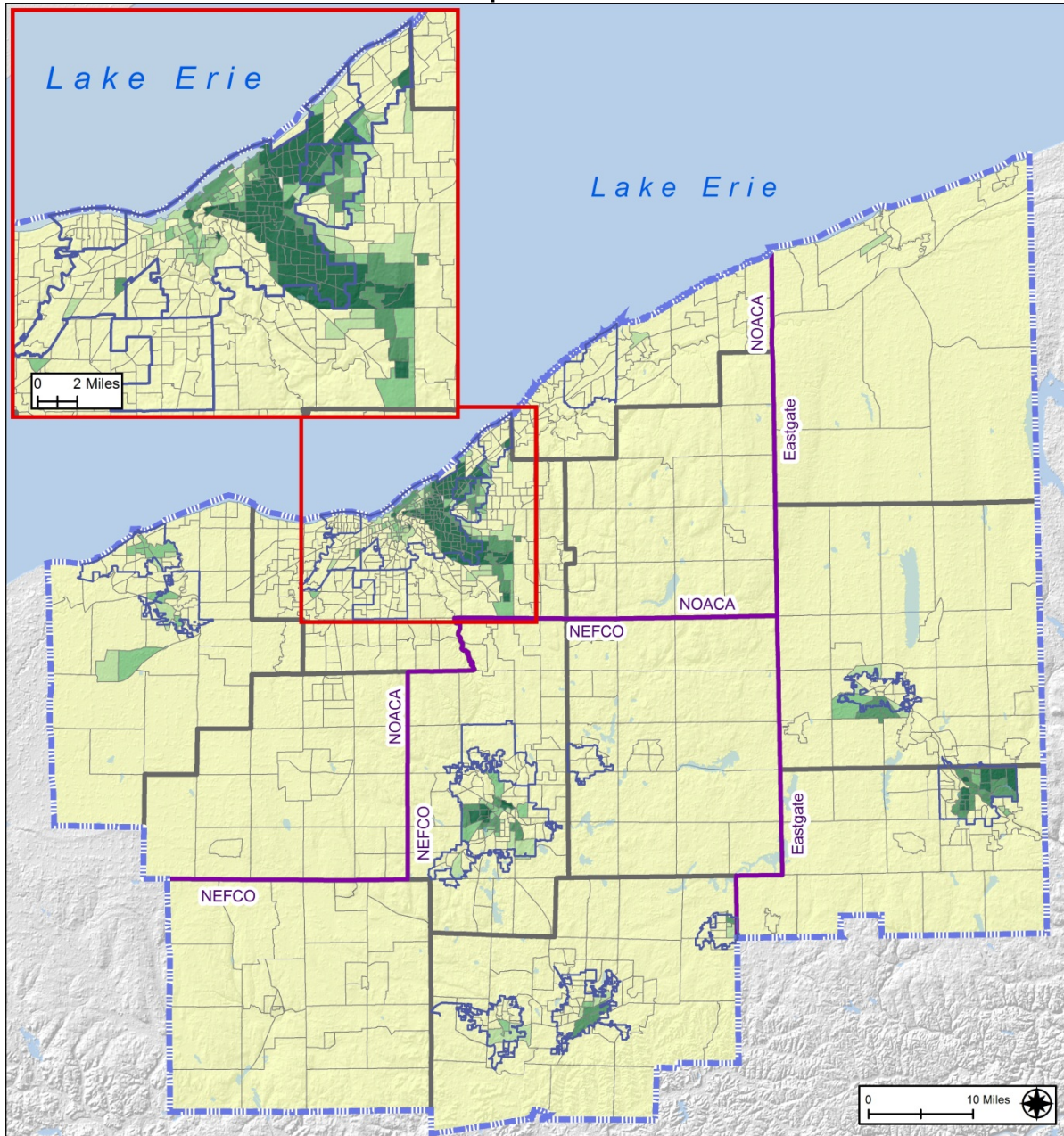
Data Source: 1980 Census, NHGIS

#### Percent Non-White





**Map II.18**  
**Non-White Population Distribution: 1990**



### LEGEND

#### 1990 Non-White Population Distribution

1990 Average Non-White Population Among All Census Tracts in the NEOSCC Region = 20.2%

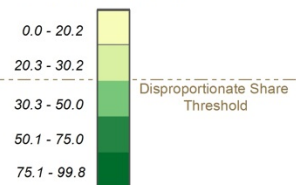
Disproportionate Share Threshold = 30.2% (A disproportionate share exists when the share of a population in a given area is at least 10 percentage points greater than the study area average.)

Entitlement City Boundaries NEOSCC Boundary

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

Data Source: 1990 Census, NHGIS

#### Percent Non-White



## C. ECONOMICS

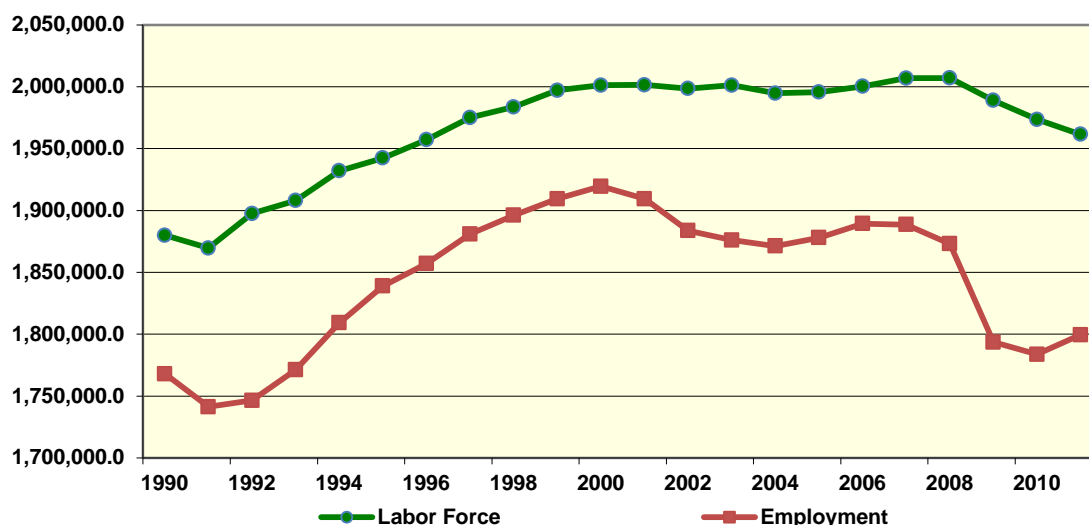
Data describing the economy are presented in the following section. This information highlights additional aspects to the factors influencing housing choice and the distribution of equity.

### LABOR FORCE AND EMPLOYMENT

Data regarding the labor force, defined as the total number of persons working or looking for work and gathered from the Bureau of Labor Statistics (BLS). Diagram II.1 graphically presents the NEOSCC Region's labor force and employment and the trends since 1990.

The gap between the labor force and the number of employed persons represents the level of unemployment. As noted in Diagram II.1, since 2008, unemployment was quite high in the NEOSCC Region, and the actual number of people working or seeking work fell each year through 2011.

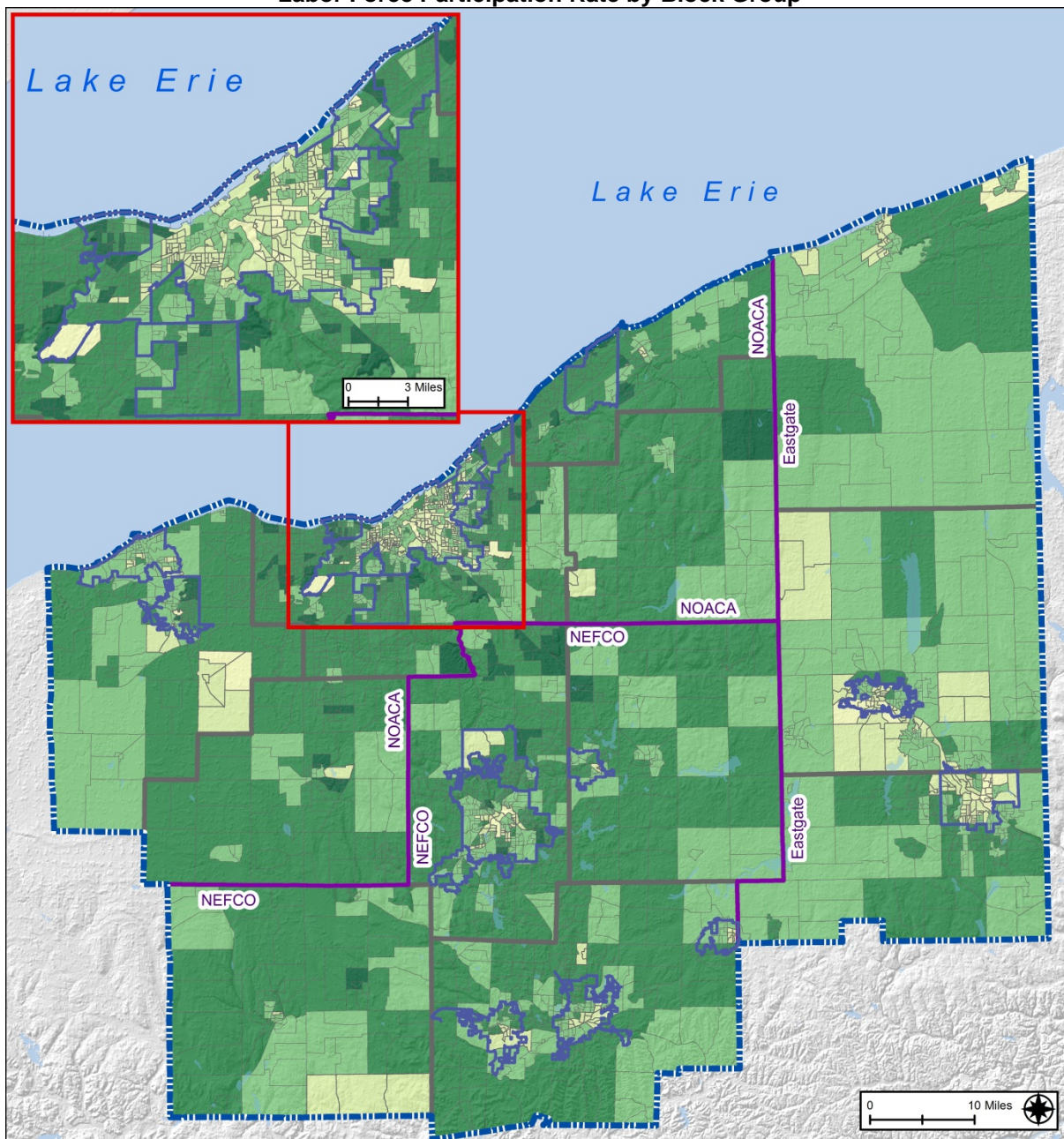
**Diagram II.1**  
**Labor Force and Total Employment**  
NEOSCC Region  
1990–2011 BLS Annual Data



As well, labor force participation rates varied significantly over the NEOSCC Region, as shown in Map II.19, on the following page. The labor force participation rates, as computed by HUD PDR, were much lower in the more urbanized areas of the NEOSCC Region.



**Map II.19**  
**Labor Force Participation Rate by Block Group**



### LEGEND

#### Labor Force Participation Rate

The labor force participation rate for every tract as a whole is assigned to each block group within that tract.

- Block Group Boundaries
- Entitlement City Boundaries
- MPO/COG Boundaries
- NEOSCC Boundary

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

Data Source: 2012 HUD PDR; 2006–2010 ACS

#### Labor Force Participation Rate

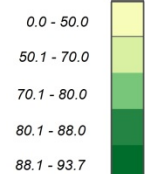
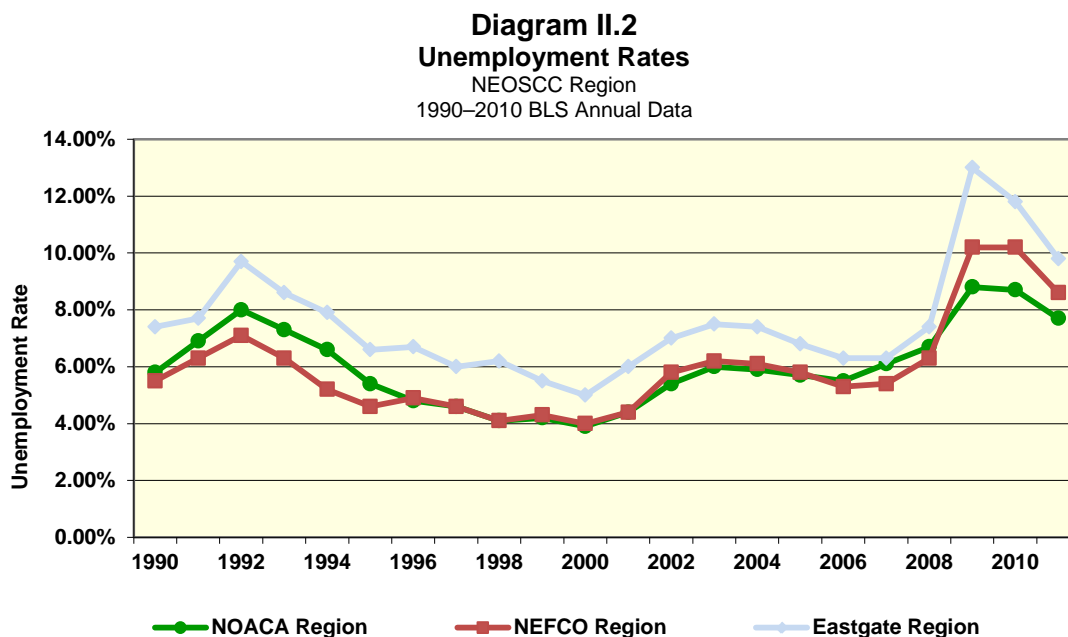
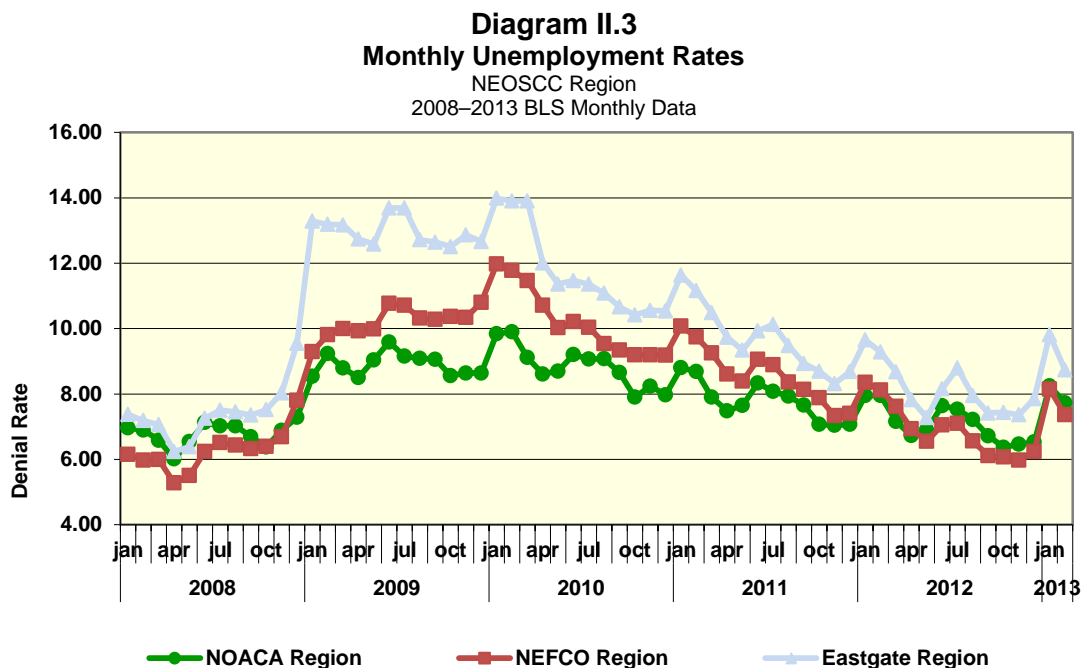




Diagram II.2 presents the yearly unemployment rates for each of the MPO/COG areas in the NEOSCC Region over this same period. Eastgate was traditionally slightly higher than the other planning areas. By 2011, NOACA had the lowest rate of the three.



When examined by month, some seasonal fluctuation in unemployment rates can be seen, as shown in Diagram II.3. Again the Eastgate region tended to have the highest unemployment rates, reaching about 14 percent in early 2010.

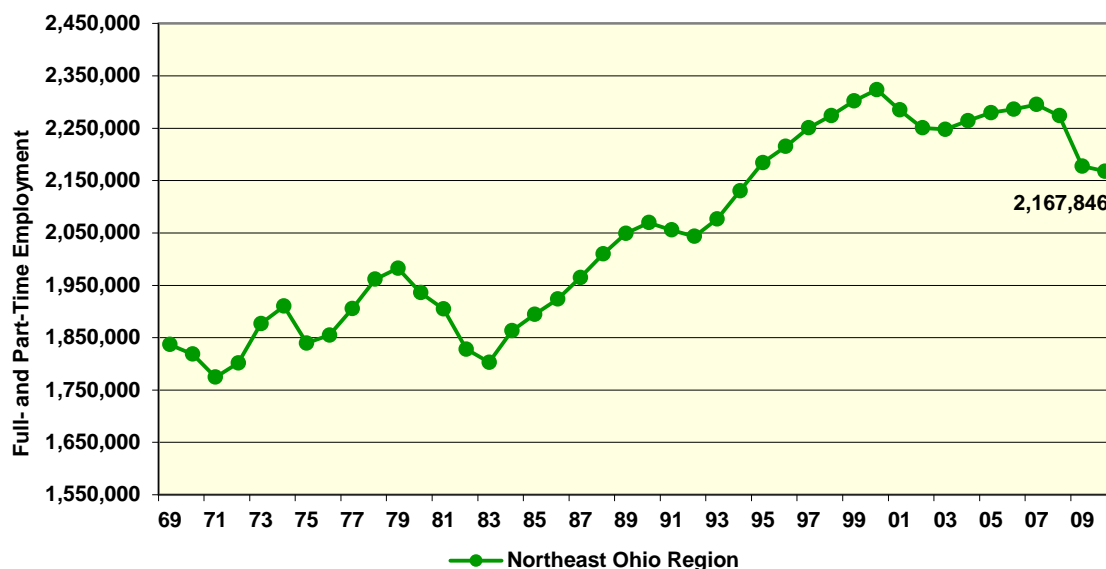


Map II.20 on the following page presents the unemployment rate by Census tract seen throughout the NEOSCC Region. As is typified in those data, areas with higher unemployment rates tended to also contain higher racial and ethnic concentrations, such as in Akron, Cleveland, and Youngstown.

## FULL- AND PART-TIME EMPLOYMENT AND EARNINGS

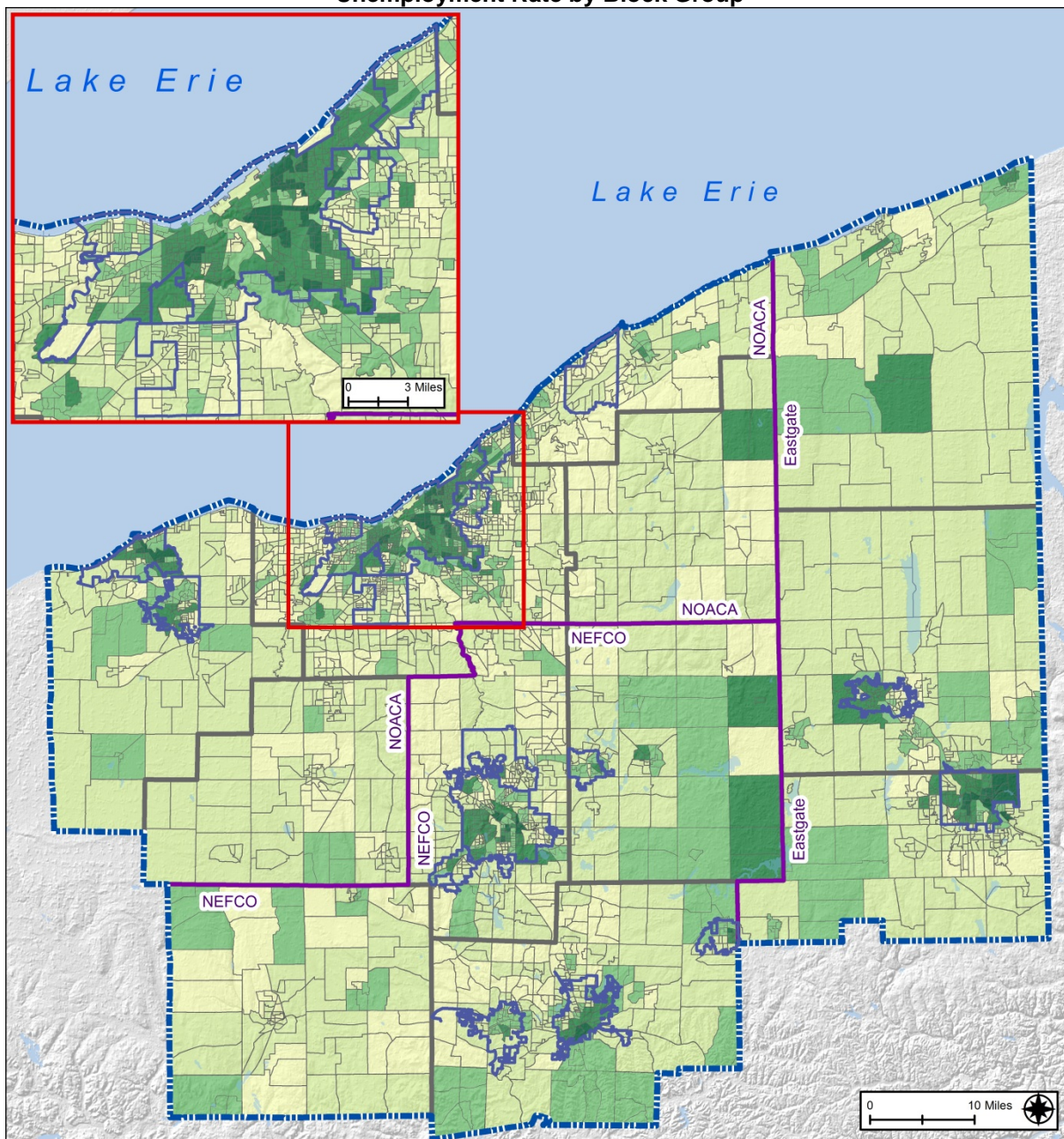
The Bureau of Economic Analysis (BEA) provides an alternate view of employment: a count of both full- and part-time jobs.<sup>12</sup> Thus, a person working more than one job can be counted more than once. As shown in Diagram II.4, the total number of jobs in the NEOSCC Region has been on a decline over the last few years, dropping by nearly 200,000 jobs, with a very sharp decline between 2008 and 2009.

**Diagram II.4**  
**Total Full- and Part-Time Employment**  
 NEOSCC Region  
 1969–2010 BEA Data



<sup>12</sup> Data are, in part, from administrative records, and the most current BEA data available were through 2010.

**Map II.20**  
**Unemployment Rate by Block Group**



## LEGEND

### Unemployment Rate

The unemployment rate for every tract as a whole is assigned to each block group within that tract.

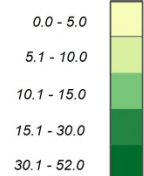
- Block Group Boundaries
- Entitlement City Boundaries
- MPO/COG Boundaries

- NEOSCC Boundary

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

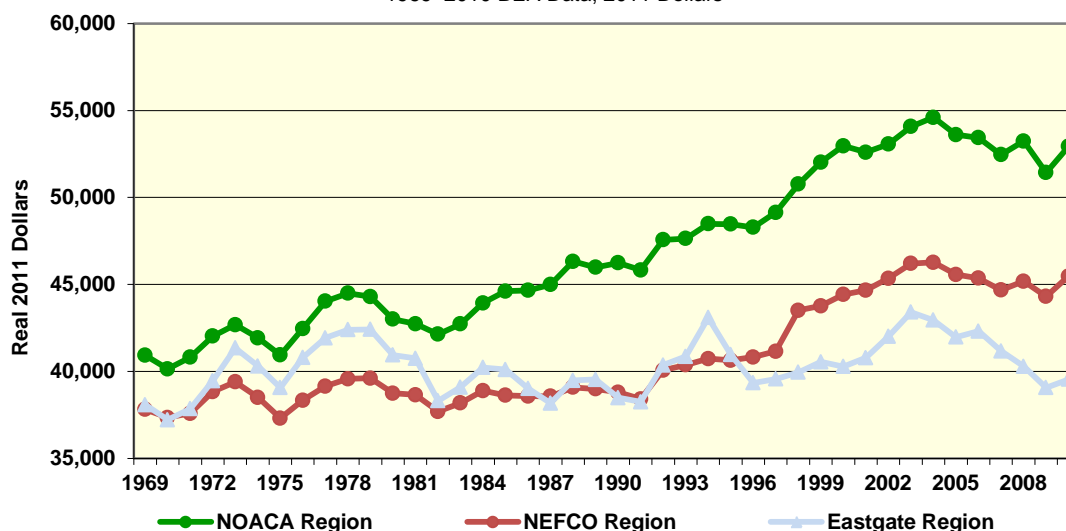
Data Source: 2012 HUD PDR; 2006–2010 ACS

### Unemployment Rate



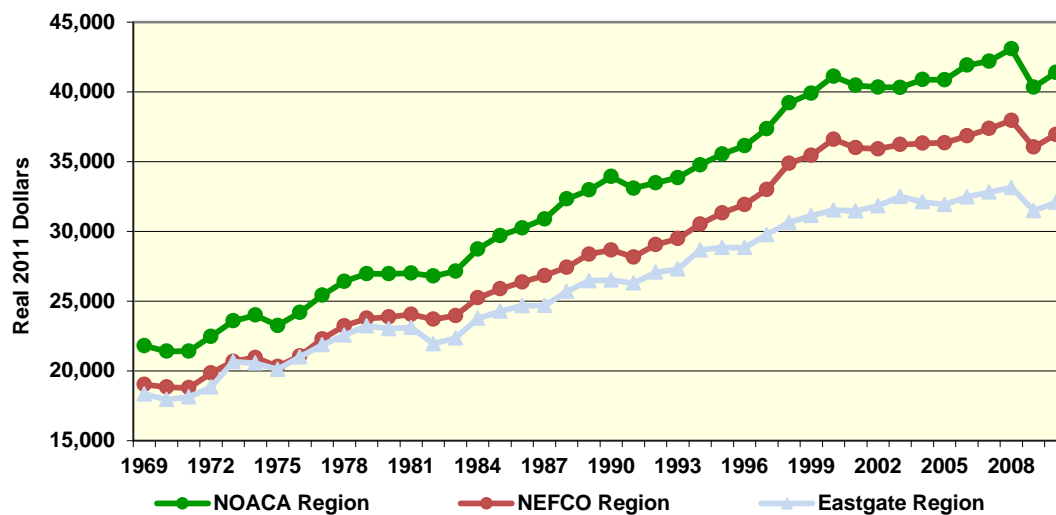
This is a troublesome pattern, but it is also important to view the wage rates that workers experienced during such economic times. Comparing average earnings per job is one method. When the total earnings from employment is divided by the number of jobs and then deflated to remove the effects of inflation, average real earnings per job is determined. Diagram II.5 shows real average earnings per job for each of the MPO/COG areas in the NEOSCC Region. Although there were declines in the past few years, the NOACA region maintained a higher wage level than other areas of the NEOSCC Region. The Eastgate area tended to be much lower, more than \$10,000 less than wages in NOACA over the past several years.

**Diagram II.5**  
**Real Average Earnings Per Job**  
 NEOSCC Region  
 1969–2010 BEA Data, 2011 Dollars



Another gauge of economic health involves income from all sources: wages earned; transfer payments; and property income such as dividends, interest, and rents. When these figures are added together and divided by population, per capita income is determined. Diagram II.6 shows real per capita income in the NEOSCC Region from 1969 through 2010 and for each of the MPO/COG areas. Over the 40-year period, per capita income continued to expand well. However, between 2008 and 2009, this measure of economic well-being declined substantially.

**Diagram II.6**  
**Real Per Capita Income**  
 NEOSCC Region  
 1969–2010 BEA Data, 2011 Dollars



## HOUSEHOLD INCOME

Table II.9 presents the number of households in the NEOSCC Region by income range, as derived from the 2000 Census count and the 2010 five-year ACS estimates. In 2000, 15.6 percent of households had incomes under \$15,000, and an additional 15.1 percent had incomes between \$15,000 and \$24,999. The largest shares were of households earning between \$25,000 and \$74,999. More recent ACS data showed that the percentage of households with incomes of less than \$15,000 decreased to 14.5, and the other lower-income categories decreased as well. The shares of households earning \$50,000 and more all increased. These findings suggest that incomes in the Region improved.



**Table II.9**  
**Households by Income**

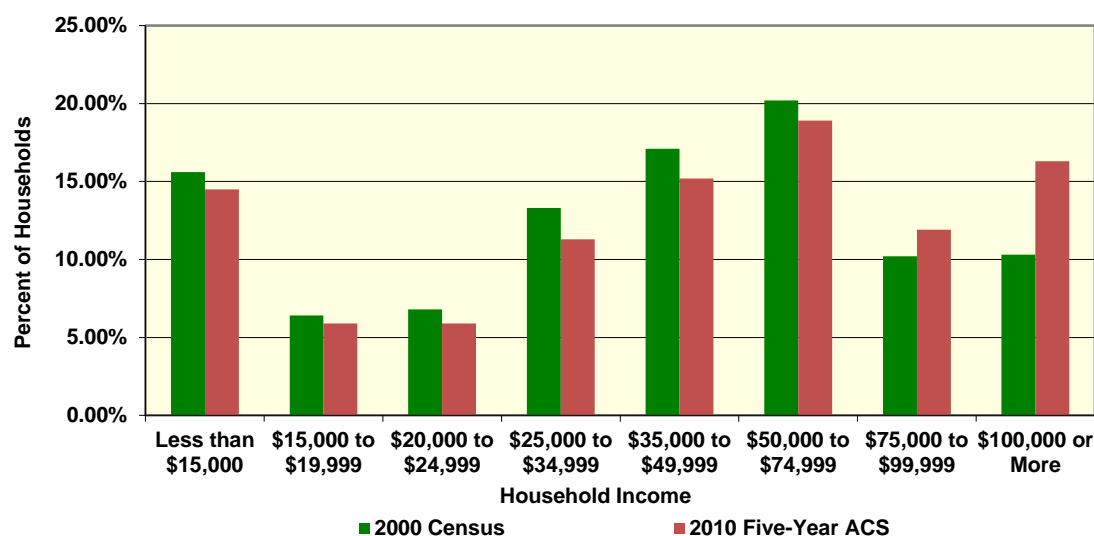
NEOSCC Region  
2000 Census SF3 & 2010 Five-Year ACS Data

Income	2000 Census		2010 Five-Year ACS	
	Households	% of Total	Households	% of Total
Less than \$15,000	241,559	15.6%	224,599	14.5%
\$15,000 to \$19,999	99,258	6.4%	91,170	5.9%
\$20,000 to \$24,999	105,665	6.8%	91,540	5.9%
\$25,000 to \$34,999	205,451	13.3%	175,581	11.3%
\$35,000 to \$49,999	264,492	17.1%	235,132	15.2%
\$50,000 to \$74,999	312,915	20.2%	293,380	18.9%
\$75,000 to \$99,999	158,038	10.2%	184,231	11.9%
\$100,000 or More	160,145	10.3%	253,143	16.3%
<b>Total</b>	<b>1,547,523</b>	<b>100.0%</b>	<b>1,548,776</b>	<b>100.0%</b>

Diagram II.7 presents these income distributions graphically and further demonstrates the shift from lower- to medium- and higher-income households over time.

**Diagram II.7**  
**Households by Income**

NEOSCC Region  
2000 Census SF3 & 2010 Five-Year ACS Data



## POVERTY

The Census Bureau uses a set of income thresholds that vary by family size and composition to determine poverty status. If a family's total income is less than the threshold for its size, then that family, and every individual in it, is considered poor. The poverty thresholds do not vary geographically, but they are updated annually for inflation using the Consumer Price Index. The official poverty definition counts income before taxes and does not include capital gains and non-cash benefits such as public housing, Medicaid, and food stamps. Poverty is not defined for persons in military barracks, institutional group quarters, or for unrelated individuals under age 15 such as foster children.

In the NEOSCC Region the poverty rate in 2000 was 10.5 percent, with 401,725 persons considered to be living in poverty, as shown in Table II.10. There were 54,592 children aged 5 and below living in poverty at that time, in addition to 42,043 persons aged 65 and older. The 2010 ACS data showed that poverty in the NEOSCC Region increased to 13.9 percent. Poverty also increased for those in their primary earning years of 18 to 64, from 52.7 percent to 55.7 percent. However, between the three MPO/COG areas, the poverty rates were different. The area with the smallest population, Eastgate, also tended to have the highest poverty rate, at 15.9 percent in 2010, compared to NOACA at 13.9 percent and NEFCO at 13.0 percent.

**Table II.10**  
**Poverty by Age**

NEOSCC Region

2000 Census SF3 & 2010 Five-Year ACS Data

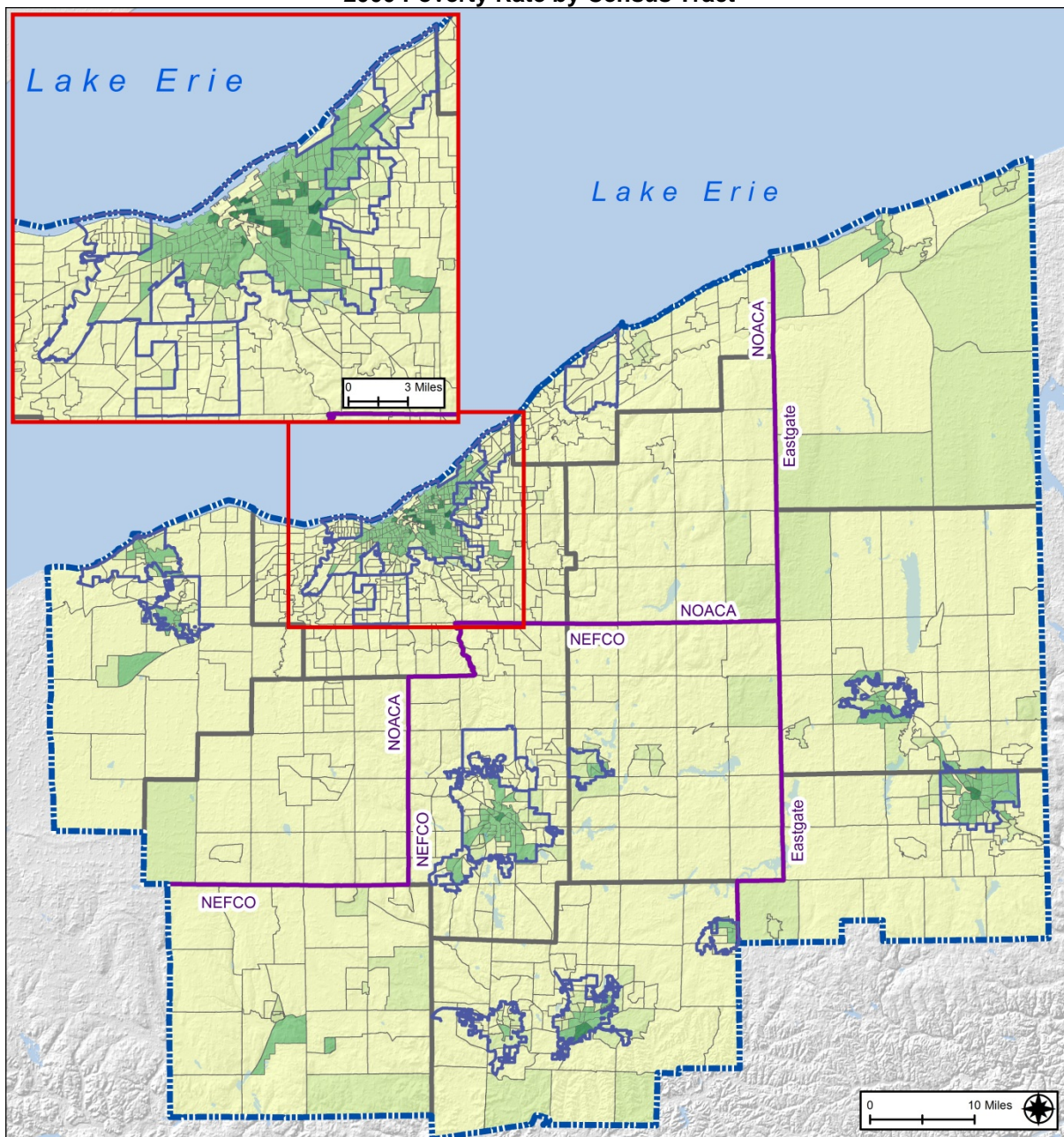
Age	2000 Census		2010 Five-Year ACS	
	Population in Poverty	% of Total	Population in Poverty	% of Total
<b>NOACA Region</b>				
Under 6	30,743	13.6%	35,687	12.7%
6 to 17	54,213	23.9%	65,415	23.2%
18 to 64	117,308	51.8%	153,158	54.4%
65 or Older	24,234	10.7%	27,182	9.7%
<b>Total</b>	<b>226,498</b>	<b>100.0%</b>	<b>281,442</b>	<b>100.0%</b>
<b>Poverty Rate</b>	<b>10.8%</b>	<b>.</b>	<b>13.8%</b>	<b>.</b>
<b>NEFCO Region</b>				
Under 6	14,644	13.4%	20,068	13.2%
6 to 17	23,614	21.7%	31,289	20.6%
18 to 64	60,424	55.5%	89,064	58.6%
65 or Older	10,267	9.4%	11,522	7.6%
<b>Total</b>	<b>108,949</b>	<b>100.0%</b>	<b>151,943</b>	<b>100.0%</b>
<b>Poverty Rate</b>	<b>9.4%</b>	<b>.</b>	<b>13.0%</b>	<b>.</b>
<b>Eastgate Region</b>				
Under 6	9,205	13.9%	10,861	12.6%
6 to 17	15,476	23.4%	19,790	22.9%
18 to 64	34,055	51.4%	47,552	55.0%
65 or Older	7,542	11.4%	8,233	9.5%
<b>Total</b>	<b>66,278</b>	<b>100.0%</b>	<b>86,436</b>	<b>100.0%</b>
<b>Poverty Rate</b>	<b>11.6%</b>	<b>.</b>	<b>15.9%</b>	<b>.</b>
<b>NEOSCC Region</b>				
Under 6	54,592	13.6%	66,616	12.8%
6 to 17	93,303	23.2%	116,494	22.4%
18 to 64	211,787	52.7%	289,774	55.7%
65 or Older	42,043	10.5%	46,937	9.0%
<b>Total</b>	<b>401,725</b>	<b>100.0%</b>	<b>519,821</b>	<b>100.0%</b>
<b>Poverty Rate</b>	<b>10.5%</b>	<b>.</b>	<b>13.9%</b>	<b>.</b>

While there were differences between the MPO/COG areas, poverty was not spread evenly throughout these three regions either, as some Census tracts had much higher rates of poverty than did others. Map II.21 presents the poverty rates in 2000 geographically. Census tracts that had a disproportionate share of persons living in poverty were those areas where the poverty rate was greater than 20.5 percent. As noted in the map, these areas tended to be clustered in and around the more urbanized areas of the NEOSCC Region.

Data from the 2010 ACS were also mapped to determine the spatial distribution of poverty. As shown in Map II.22, the geographic spread of poverty expanded, with many more Census tracts having a disproportionate share of poverty. In addition, the poverty rate increased to 13.9 percent over the decade.



**Map II.21**  
**2000 Poverty Rate by Census Tract**



### LEGEND

#### 2000 Poverty Rate Distribution

2000 Average Poverty Rate Among All Census Tracts in the NEOSCC Region = 10.5%

Disproportionate Share Threshold = 10.5% (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.)

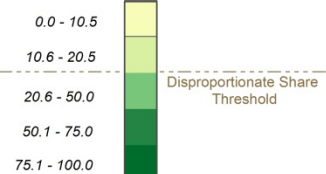
- Census Tract Boundaries
- Entitlement City Boundaries
- MPO/COG Boundaries

- NEOSCC Boundary

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

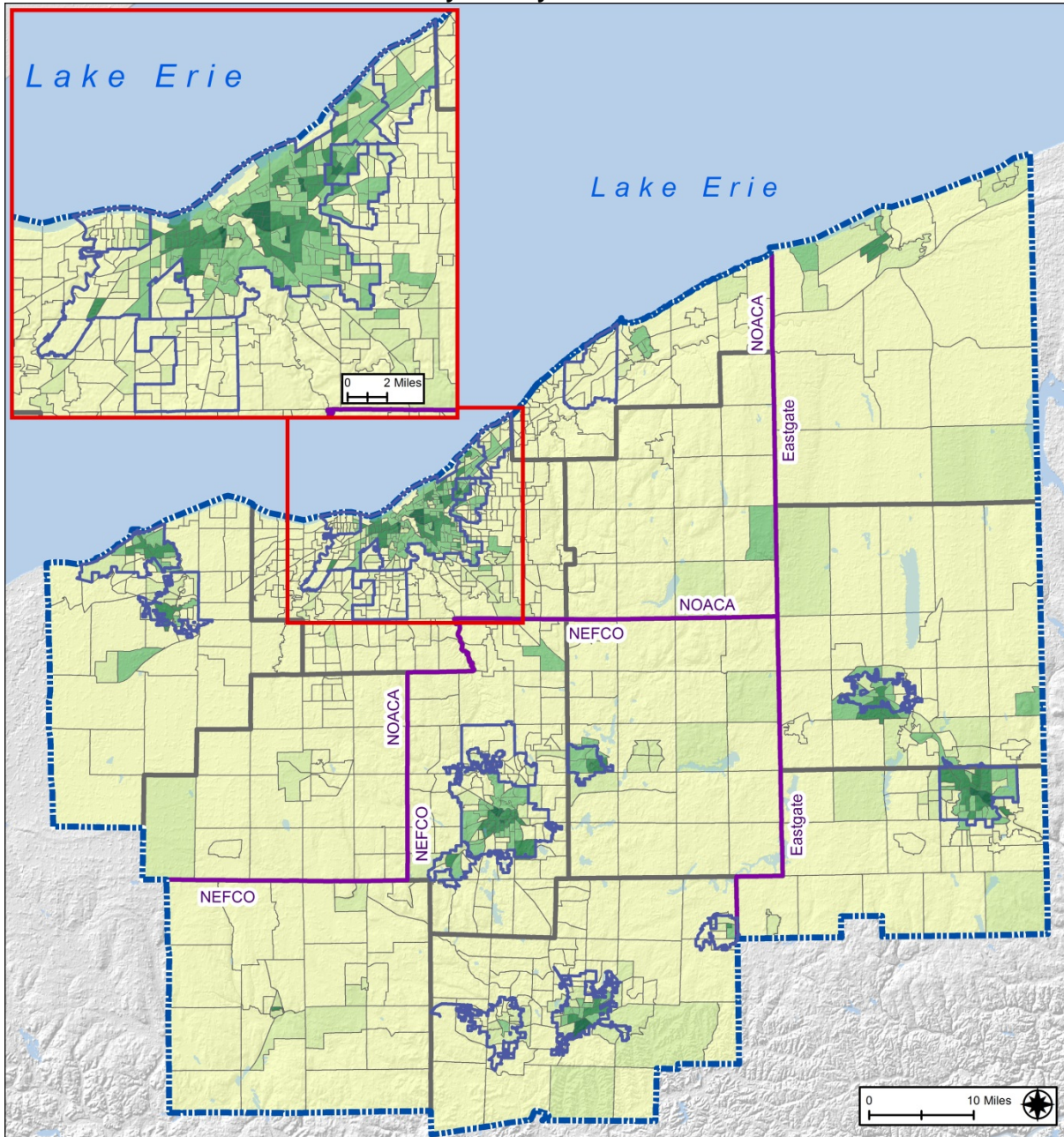
Data Source: 2000 Census

#### Poverty Rate





**Map II.22**  
**Poverty Rate by Census Tract**



### LEGEND

#### 2006–2010 Poverty Rate Distribution

2006–2010 Average Poverty Rate Among All Census Tracts in the NEOSCC Region = 13.9%

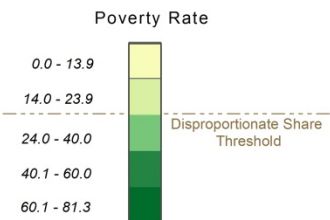
Disproportionate Share Threshold = 23.9% (A disproportionate share exists when the share of a population in a given area is at least 10 percentage points greater than the study area average.)

- Census Tract Boundaries
- Entitlement City Boundaries
- MPO/COG Boundaries

- NEOSCC Boundary

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

Data Source: 2006–2010 ACS



## TRANSPORTATION INFRASTRUCTURE

Concentrations of poverty can be viewed from the perspective of the ability of the persons residing in these areas and their ability to secure a mode of transportation to their hoped for place of employment. A geographic map was prepared that overlays all the transportation networks throughout the NEOSCC Region as well as poverty and location of employment centers. As shown in Map II.23, often the transportation system does not link well with residents' ability to get to an employment center. This is particularly true for employment centers that are slightly outside of the central cities.

## D. RACIALLY AND ETHNICALLY CONCENTRATED AREAS OF POVERTY

The geographic maps presented previously demonstrate that there are areas with high concentrations of poverty, with some tracts having nearly 100 percent of its residents in poverty. Previously presented in this document are areas with high concentrations of racial and ethnic minorities. Together, these concepts were reviewed in detail by HUD's definition for a racially concentrated area of poverty (RCAP) or ethnically concentrated area of poverty (ECAP). These areas exist when at least 50 percent of the population is non-white or Hispanic, respectively, and at least 40 percent of the population is in poverty. Hence, this classification system is binary: "yes" or "no" whether the condition exists in the Census tract.

HUD's FHEA database presents data for racially and/or ethnically concentrated areas using the 2005–2009 five-year ACS data by Census tract. These data are presented in Map II.24. As shown therein, nearly all of such areas were contained within the urbanized areas of the NEOSCC Region, with Cleveland having the greatest number of such tracts.

The RCAP and ECAP classification was updated using newer ACS data, as well as separating the racial and ethnic measures to better identify. The resulting calculations are shown in the following tables and maps. As shown in Table II.11, there were 61 RCAP and/or ECAP tracts in the Region, with more than half of these (41) in the NOACA region, 9 in the NEFCO region, and 11 in the Eastgate area. However, the highest proportion of RCAP and/or ECAP tracts was located in the Eastgate area.

**Table II.11**  
**Census Tracts by RCAP/ECAP Status**

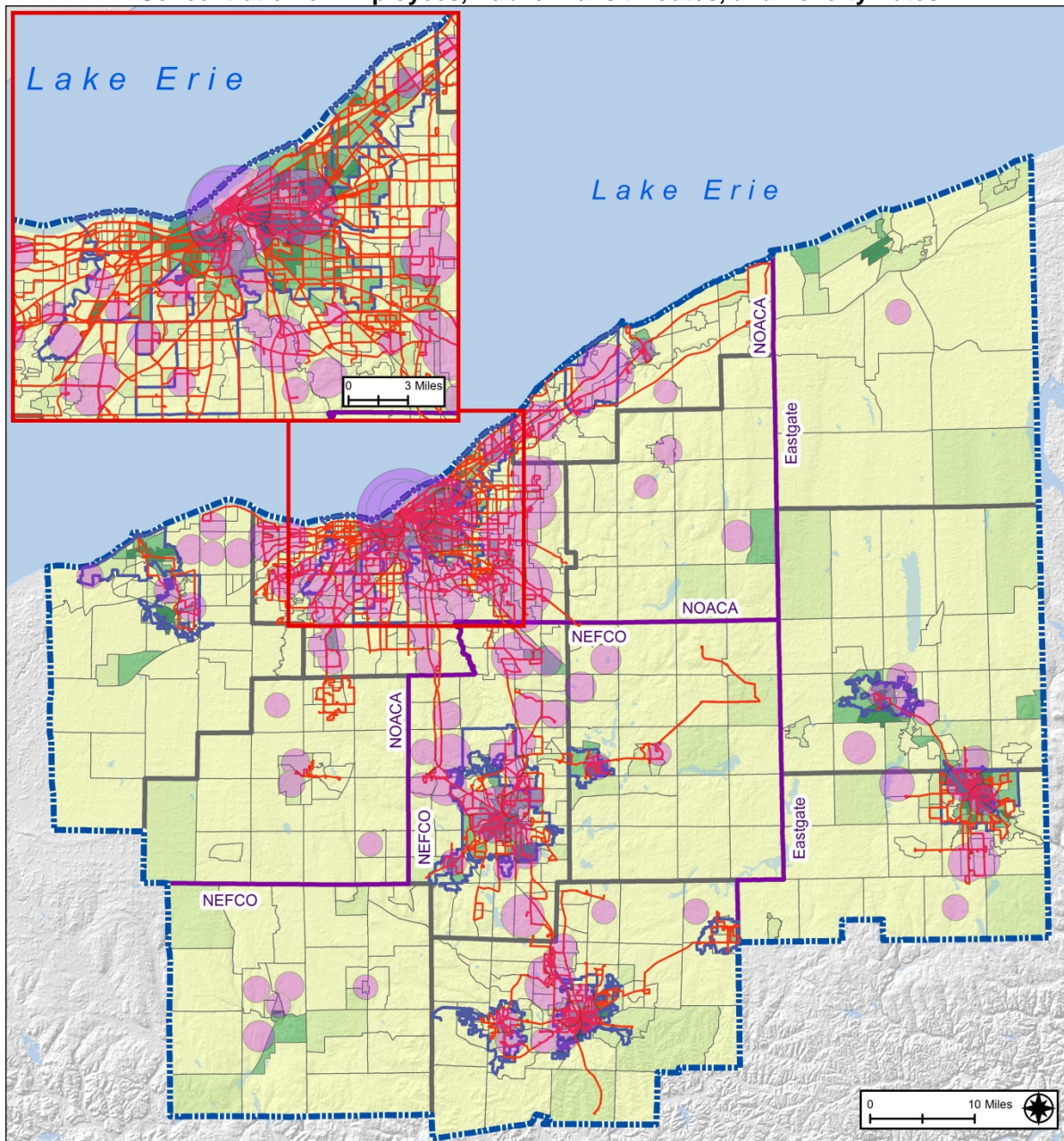
NEOSCC Region  
HUD PDR, 2010 Census, and 2010 Five-Year ACS Data

Region	Total Tracts	RCAP	ECAP	RCAP or ECAP	% RCAP or ECAP
NOACA	638	41	1	41	6.4%
NEFCO	288	9	0	9	3.1%
Eastgate	151	11	0	11	7.3%
<b>Total</b>	<b>1,077</b>	<b>61</b>	<b>1</b>	<b>61</b>	<b>5.7%</b>

Table II.12 shows common issues among RCAP and/or ECAP tracts, including several economic and housing variables. More than 96 percent of RCAP and/or ECAP tracts had an unemployment rate of more than 10 percent, and in the same percentage of these tracts, more than 13.6 percent of the housing stock was vacant and classified as "other vacant." In 98.4 percent of these tracts, more than 31.1 percent of renters were cost-burdened.



**Map II.23**  
**Concentration of Employees, Public Transit Routes, and Poverty Rates**



#### LEGEND

##### Concentration of Employees, Public Transit Routes, and Poverty Rates

2006–2010 Average Poverty Rate Among All Census Tracts in the NEOSCC Region = 13.2%

- Census Tract Boundaries
- Entitlement City Boundaries
- MPO/COG Boundaries

- Public Transit Routes
- NEOSCC Boundary

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

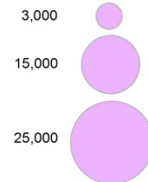
##### Poverty Rate

0.0 - 13.2  
 13.3 - 23.2  
 23.4 - 40.0  
 40.1 - 60.0  
 60.1 - 81.2



##### Tracts with 3,000 - 49,381 Employees

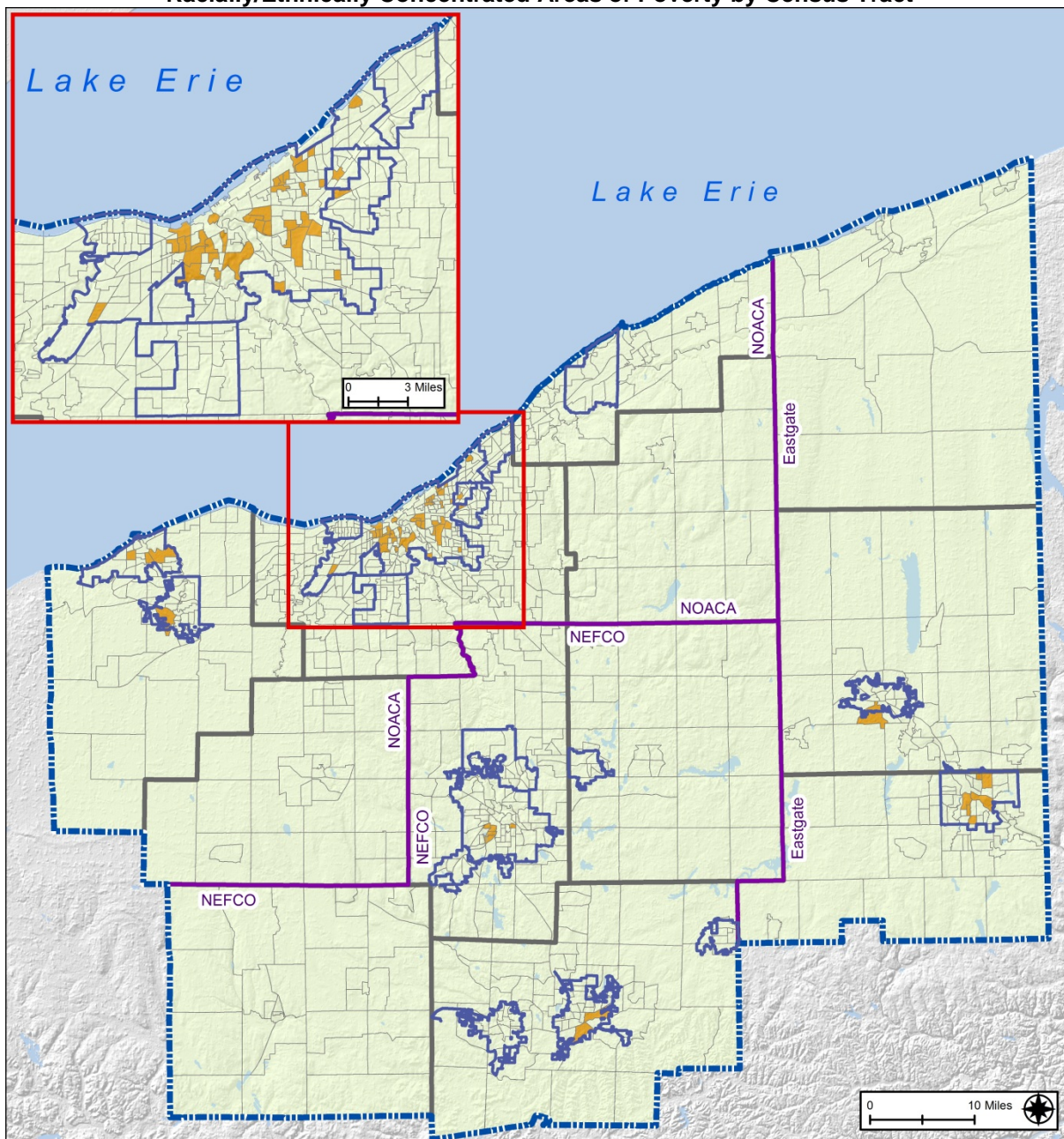
3,000  
 15,000  
 25,000



Data Source: 2010 LEHD, NEOSCC, 2006–2010 ACS



**Map II.24**  
**Racially/Ethnically Concentrated Areas of Poverty by Census Tract**



#### LEGEND

##### 2005–2009 Racially/Ethnically Concentrated Areas of Poverty (HUD PDR)

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

- RCAPs/ECAPs
- Non RCAP/ECAP Census Tracts
- Entitlement City Boundaries
- NEOSCC Boundary
- MPO/COG Boundaries

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

Data Source: 2012 HUD PDR using 2005–2009 ACS

**Table II.12**  
**Census Tracts in RCAP & ECAP Areas by Condition**  
 NEOSCC Region  
 HUD PDR, 2010 Census, and 2010 Five-Year ACS Data

Condition	NOACA	NEFCO	Eastgate	Tracts w/ Condition	RCAP/ECAP Tracts	% RCAP/ ECAP Tracts w/ Condition
<b>Economics</b>						
Unemployment Rate > 10%	40	8	11	59	61	96.7%
Labor Market Engagement Index < 20	36	9	10	55	61	90.2%
Labor Force Participation Rate < 70%	21	6	9	36	61	59.0%
<b>Housing</b>						
Median Contract Rent < \$1,000	41	9	11	61	61	100.0%
Renter Units with Cost Burden > 31.1%	40	9	11	60	61	98.4%
Vacant Units Which Are "Other" Vacant > 13.6%	38	9	11	58	61	95.1%
Owner Units with a Mortgage > 31.4%	33	9	8	50	61	82.0%
Median Home Value < \$100,000	32	7	11	50	61	82.0%
Neighborhood School Proficiency Index < 2 0	38	2	6	46	61	75.4%
Owner Units without a Mortgage > 20.4%	21	3	8	32	61	52.5%
Occupied Units with Overcrowding > 10.8%	.	.	.	0	61	0.0%
Occupied Units Lacking Kitchen Facilities > 10.9%	.	.	.	0	61	0.0%
Occupied Units Lacking Plumbing Facilities > 10.4%	.	.	.	0	61	0.0%

Map II.25 presents the RCAP areas in the NEOSCC Region. All the RCAP areas were wholly or partially contained in the larger cities of the Region. There was only one ECAP tract, shown in Map II.26, located in Lakewood in the NOACA region.

### ***Historic Patterns of Racially and Ethnically Concentrated Poverty***

As mentioned previously, some of the reasons for current concentrations of inequitably distributed poverty can be examined from a historical perspective. Having particular effect on working-class families in Cleveland were the urban renewal development efforts of the 1950s and 60s. In many Cleveland neighborhoods, blocks of older homes were demolished and residents were displaced to make room for new housing, commercial, and infrastructure development. This occurred around the same period of de-institutionalization of homeless shelters and mental hospitals. While some black families were directed to particular public housing sites, most of them were left with no formal housing options as a result of urban renewal efforts. Thus, the 1950s saw a large increase in the homeless black population, such as in the Gladstone urban renewal area of Cedar-Central, where hundreds of residents without jobs or opportunities to move were left homeless.<sup>13</sup>

Nationwide, metropolitan areas have experienced increasing economic segregation since World War II. Despite decreased poverty levels overall since the 1960s, the concentration of poverty in the metropolitan areas of the Region has only intensified. In fact, the number of poor residents living in extremely poor neighborhoods increased by nearly 30% during the 1970s.<sup>14</sup> This extreme economic segregation is a result of two, often simultaneous conditions, (1) the gradual abandonment of decaying sections of the central city by the non-poor and (2) local practices that exclude poor and minorities from affluent areas.<sup>15</sup> The practice of redlining—denying or charging more for banking and insurance services in high-risk areas (often black inner city neighborhoods)—was prevalent at a region-wide scale until the late 1970s when federal regulations helped to curtail the practice. By this time, however, the damage had been done.

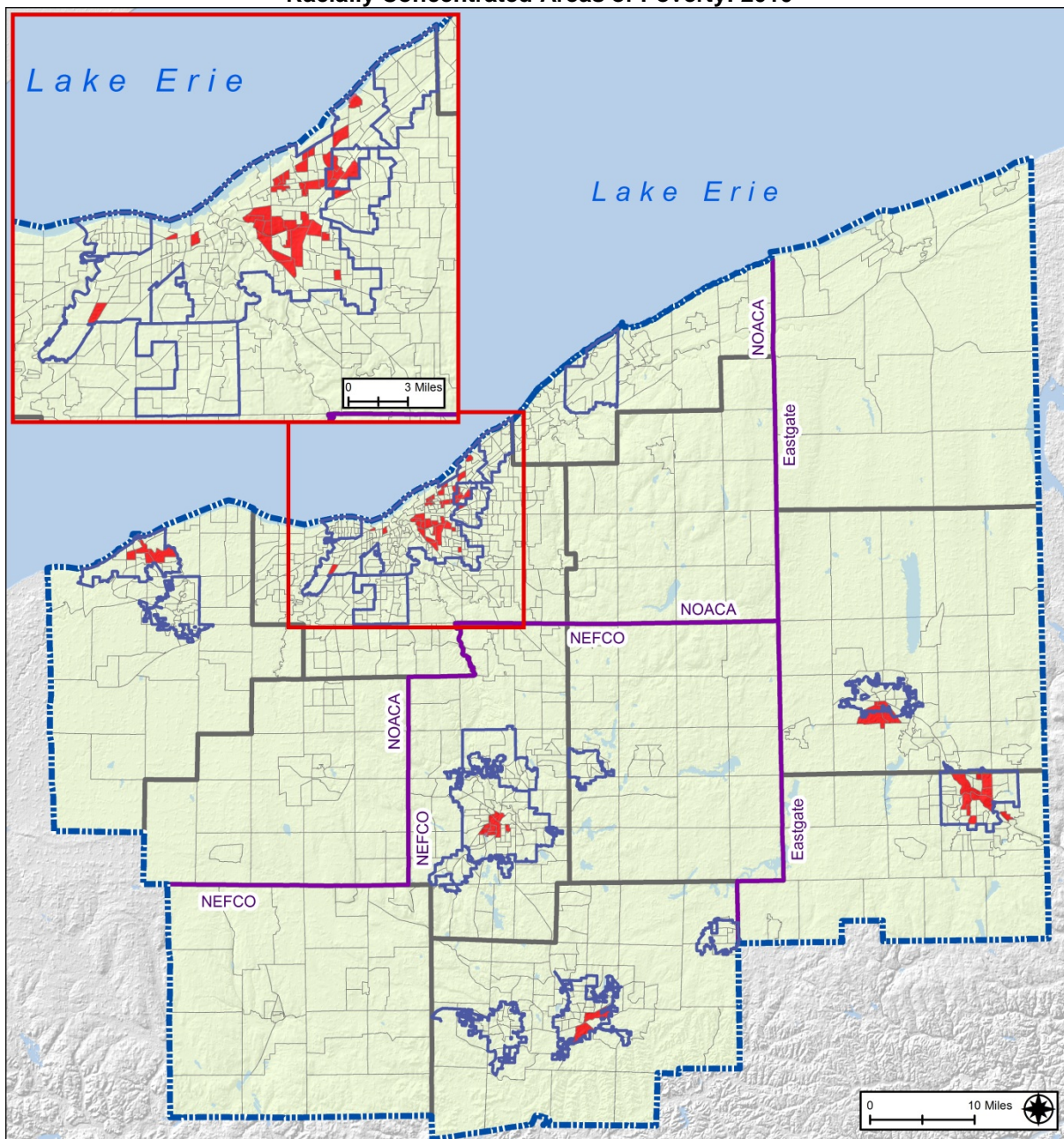
<sup>13</sup> (Kerr 2011) *Derelict Paradise*, p. 143–143

<sup>14</sup> (Holloway 1999) *Race, Scale, and Concentration of Poverty in Columbus Ohio*, Abstract.

<sup>15</sup> (Massey 1996) *Demography*, Vol 3, No. 4. The Age of Extremes: Concentrated Affluence and Poverty in the 21<sup>st</sup> Century. P 395-412.



**Map II.25**  
**Racially Concentrated Areas of Poverty: 2010**



#### LEGEND

##### 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.

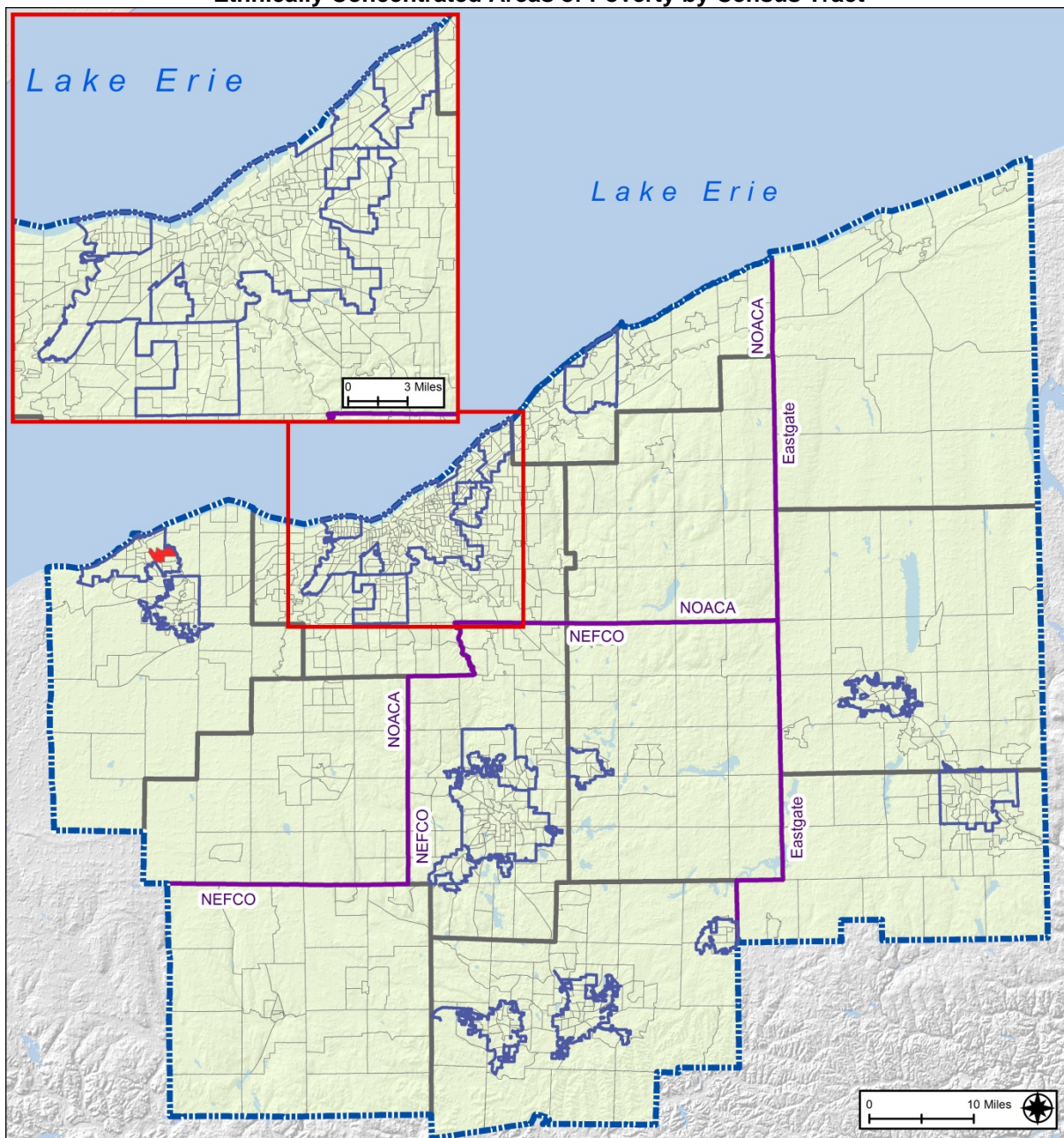
- RCAPs
- Non-RCAP Census Tracts
- Entitlement City Boundaries
- MPO/COG Boundaries
- NEOSCC Boundary

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

Data Source: 2006–2010 ACS



**Map II.26**  
**Ethnically Concentrated Areas of Poverty by Census Tract**



#### LEGEND

##### 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
- MPO/COG Boundaries

□ NEOSCC Boundary

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

Data Source: 2006–2010 ACS



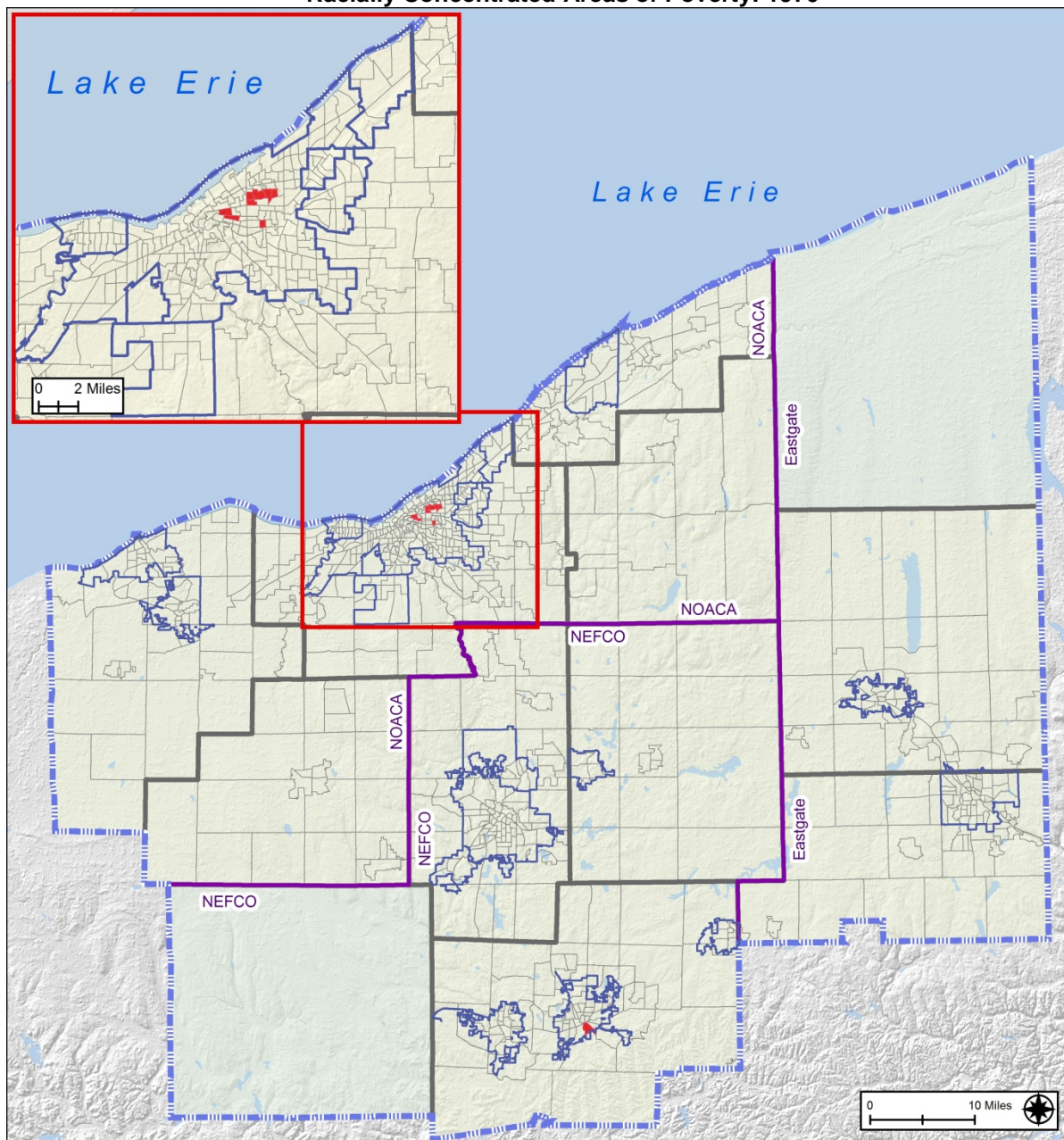
Geographic isolation of the poor, particularly when combined with high levels of racial segregation, results in the abandonment of poor urban neighborhoods and, ultimately, complete community disinvestment. The lack of social resources and grim conditions of these inner-city neighborhoods compromise the ability of residents to overcome their difficulties and realize a higher quality of life.<sup>16</sup>

Maps II.27 – II.30 present the distribution of Racially Concentrated Areas of Poverty (RCAPs) in the NEOSCC Region between the years of 1970 and 2000. The growth in the number of RCAP Census tracts can be seen clearly within all Metropolitan areas of the entire 12-county Region.

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<sup>16</sup> (Massey 1996) *Demography*, Vol 3, No. 4. The Age of Extremes: Concentrated Affluence and Poverty in the 21<sup>st</sup> Century. P 395-412.

**Map II.27**  
**Racially Concentrated Areas of Poverty: 1970**



### LEGEND

#### 1970 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.

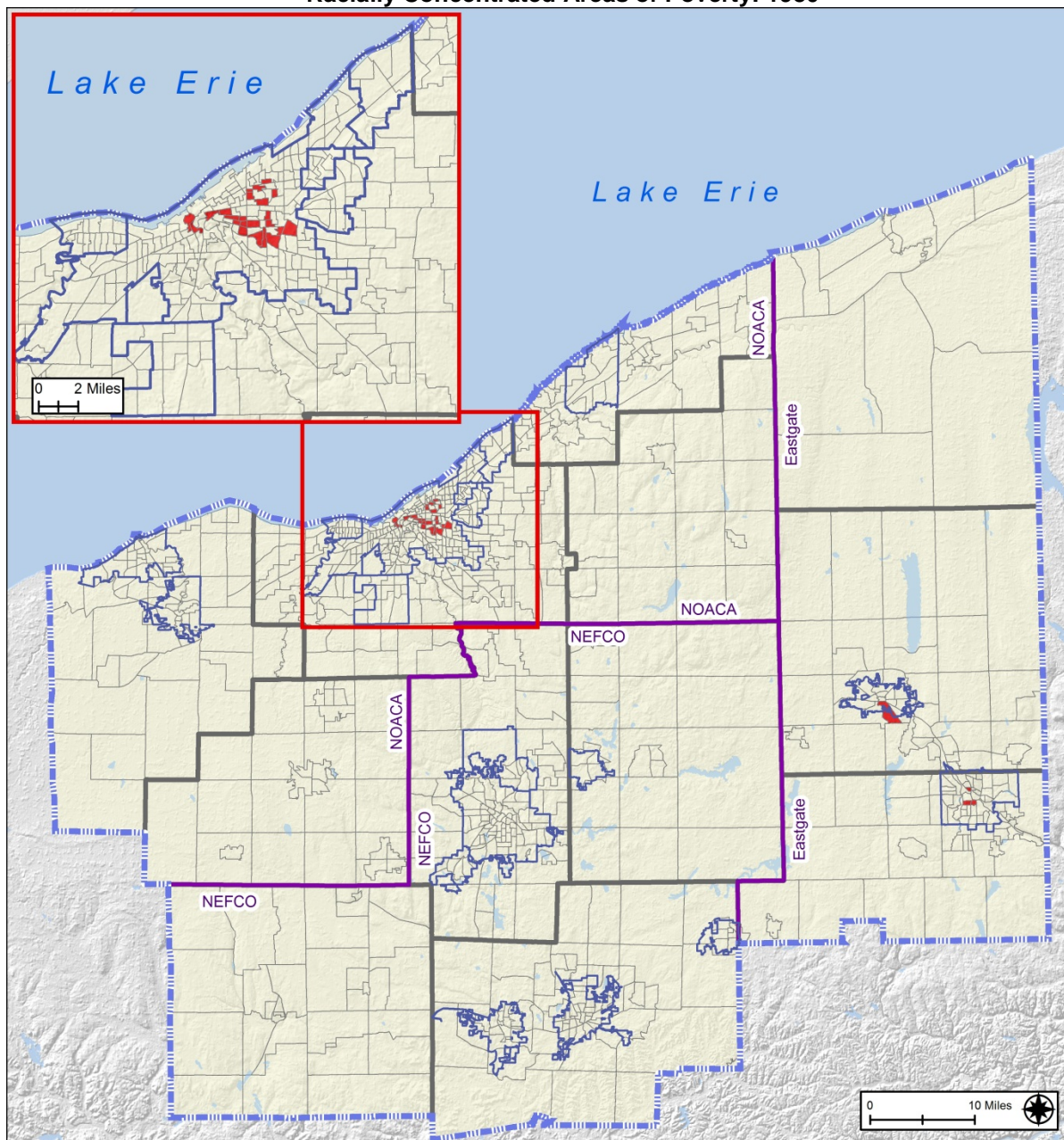
- |  |  |
|--|--|
| <span style="display: inline-block; width: 15px; height: 15px; background-color: red; border: 1px solid black;"></span> RCAP                     | <span style="display: inline-block; width: 20px; border-bottom: 2px solid blue;"></span> Entitlement City Boundaries |
| <span style="display: inline-block; width: 20px; height: 15px; background-color: yellow; border: 1px solid black;"></span> Non RCAP Census Tract | <span style="display: inline-block; width: 20px; border-bottom: 2px dashed blue;"></span> NEOSCC Boundary            |
| <span style="display: inline-block; width: 20px; height: 15px; background-color: lightgreen; border: 1px solid black;"></span> No Data           |  |

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

Data Source: 1970 Census, NHGIS



**Map II.28**  
**Racially Concentrated Areas of Poverty: 1980**



### LEGEND

#### 1980 Racially Concentrated Areas of Poverty

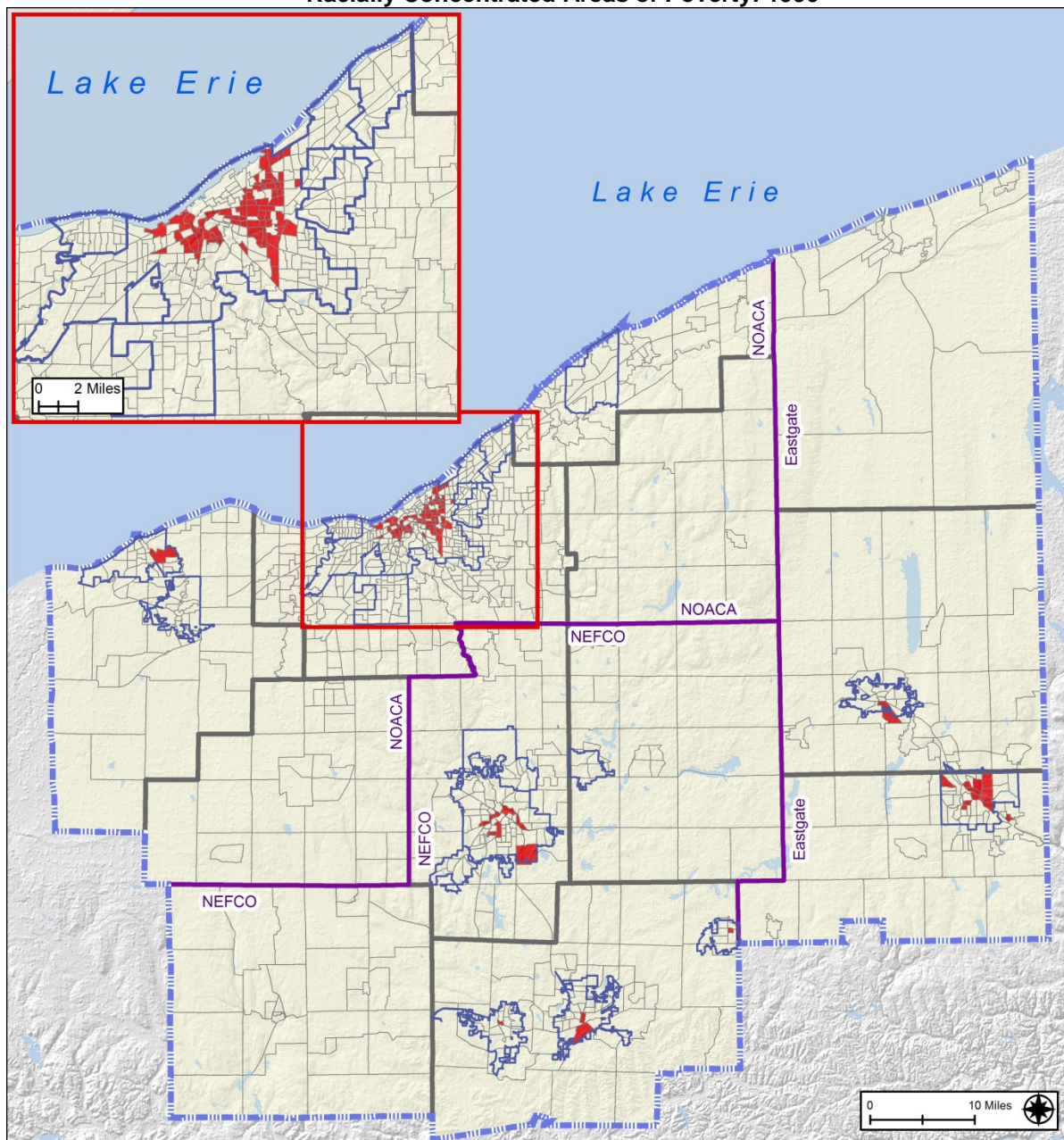
A Census Tract is considered a racially concentrated area of poverty (RCAP) when 50 percent or more of the population are non-white AND 40 percent or more of the total population are in poverty.

- |   |  |
|---|--|
| <span style="display: inline-block; width: 15px; height: 15px; background-color: red; border: 1px solid black;"></span> RCAP                      | <span style="display: inline-block; width: 20px; border-bottom: 2px solid blue;"></span> Entitlement City Boundaries |
| <span style="display: inline-block; width: 20px; height: 15px; background-color: yellow; border: 1px solid black;"></span> Non RCAP Census Tracts | <span style="display: inline-block; width: 20px; border-bottom: 2px dashed blue;"></span> NEOSCC Boundary            |
- NOTE: The Counties of Cuyahoga, Lake, Stark, and Summit are also entitlement areas.

Data Source: 1980 Census, NHGIS



**Map II.29**  
**Racially Concentrated Areas of Poverty: 1990**



### LEGEND

#### 1990 Racially Concentrated Areas of Poverty

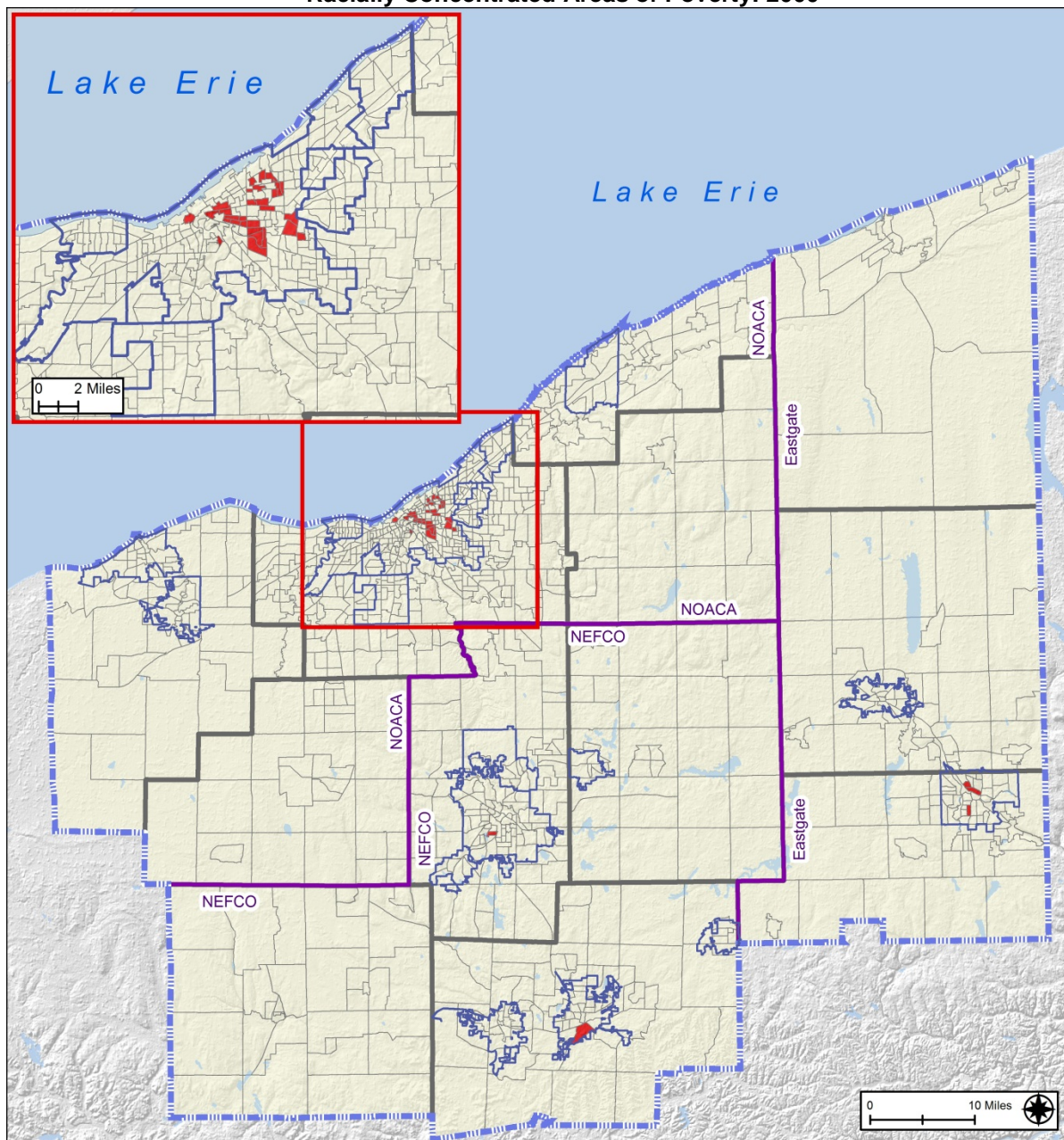
A Census Tract is considered a racially concentrated area of poverty (RCAP) when 50 percent or more of the population are non-white AND 40 percent or more of the population are in poverty.

- |  |  |
|--|--|
| <span style="display: inline-block; width: 15px; height: 15px; background-color: red; border: 1px solid black;"></span> RCAP                     | <span style="display: inline-block; width: 20px; border-bottom: 2px solid blue;"></span> Entitlement City Boundaries |
| <span style="display: inline-block; width: 15px; height: 15px; background-color: yellow; border: 1px solid black;"></span> Non RCAP Census Tract | <span style="display: inline-block; width: 20px; border-bottom: 2px dashed blue;"></span> NEOSCC Boundary            |
- NOTE: The Counties of Cuyahoga, Lake, Stark, and Summit are also entitlement areas.

Data Source: 1990 Census, NHGIS



**Map II.30**  
**Racially Concentrated Areas of Poverty: 2000**



### LEGEND

#### 2000 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 population are in poverty.

- |  |  |
|--|--|
| <span style="display: inline-block; width: 15px; height: 15px; background-color: red; border: 1px solid black;"></span> RCAP                     | <span style="display: inline-block; width: 20px; border-bottom: 2px solid blue;"></span> Entitlement City Boundaries |
| <span style="display: inline-block; width: 15px; height: 15px; background-color: yellow; border: 1px solid black;"></span> Non RCAP Census Tract | <span style="display: inline-block; width: 20px; border-bottom: 2px dashed blue;"></span> NEOSCC Boundary            |
- NOTE: The Counties of Cuyahoga, Lake, Stark, and Summit are also entitlement areas.

Data Source: 2000 Census, NHGIS

## E. HOUSING

Within the demographic and economic trends and influences, residents of the NEOSCC Region have exercised housing choice. Data presented in the following section document the outcomes of these choices according to several measures.

### CHARACTERISTICS OF THE HOUSING STOCK

Data regarding the number of housing units counted in the NEOSCC Region are presented in Table II.13. In total, the number of housing units increased by 4.9 percent between 2000 and 2010, from 1,652,351 to 1,733,494 units. During this time, the population of the Region decreased by 2.5 percent, which suggests that housing production drastically outpaced demand for housing.

**Table II.13**  
**Housing Units**

NEOSCC Region  
2000 & 2010 Census SF1 Data

Year	NOACA	NEFCO	Eastgate	NEOSCC Region
2000 Census	911,356	490,324	250,671	1,652,351
2010 Census	955,756	523,643	254,095	1,733,494
% Change	4.9%	6.8%	1.4%	4.9%

The change in housing units can also be examined by occupancy status. Between 2000 and 2010, the number of occupied housing units increased by a scant 0.7 percent, with NOACA rising by a meager 0.2 percent, NEFCO up by 3.4 percent and Eastgate falling by 3.0 percent, as presented in Table II.14. Homeownership fell from 69.9 to 68.2 percent, and in each of the MPO/COG areas. Conversely, the share of occupied housing units occupied by renters increased considerably, with renters rising 4.7 percent in NOACA, 10.5 percent in NEFCO, and 4.4 percent in Eastgate.

The difficulties seen, however, pertain to the rising housing stock and declining population. These caused the share of vacant housing to rise appreciably throughout the NEOSCC Region. The number of vacant units rose by 73.3 percent in NOACA, 64.4 percent in NEFCO, and 52.6 percent in Eastgate. Also shown in Table II.14, at the time of the 2000 Census, the vacant housing stock represented 105,184 units and by 2010, this figure reached 175,785, a region-wide jump of 67.1 percent.

**Table II.14**  
**Housing Units by Tenure**

NEOSCC Region  
2000 & 2010 Census SF1 Data

Tenure	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
NOACA Region					
Occupied Housing Units	853,165	93.6%	854,893	89.4%	0.2%
Owner-Occupied	580,872	68.1%	569,864	66.7%	-1.9%
Renter-Occupied	272,293	31.9%	285,029	33.3%	4.7%
Vacant Housing Units	58,191	6.4%	100,863	10.6%	73.3%
<b>Total Housing Units</b>	<b>911,356</b>	<b>100.0%</b>	<b>955,756</b>	<b>100.0%</b>	<b>4.9%</b>
NEFCO Region					
Occupied Housing Units	462,998	94.4%	478,730	91.4%	3.4%
Owner-Occupied	330,241	71.3%	332,098	69.4%	0.6%
Renter-Occupied	132,757	28.7%	146,632	30.6%	10.5%
Vacant Housing Units	27,326	5.6%	44,913	8.6%	64.4%
<b>Total Housing Units</b>	<b>490,324</b>	<b>100.0%</b>	<b>523,643</b>	<b>100.0%</b>	<b>6.8%</b>
Eastgate Region					
Occupied Housing Units	231,004	92.2%	224,086	88.2%	-3.0%
Owner-Occupied	169,947	73.6%	160,357	71.6%	-5.6%
Renter-Occupied	61,057	26.4%	63,729	28.4%	4.4%
Vacant Housing Units	19,667	7.8%	30,009	11.8%	52.6%
<b>Total Housing Units</b>	<b>250,671</b>	<b>100.0%</b>	<b>254,095</b>	<b>100.0%</b>	<b>1.4%</b>
NEOSCC Region					
Occupied Housing Units	1,547,167	93.6%	1,557,709	89.9%	0.7%
Owner-Occupied	1,081,060	69.9%	1,062,319	68.2%	-1.7%
Renter-Occupied	466,107	30.1%	495,390	31.8%	6.3%
Vacant Housing Units	105,184	6.4%	175,785	10.1%	67.1%
<b>Total Housing Units</b>	<b>1,652,351</b>	<b>100.0%</b>	<b>1,733,494</b>	<b>100.0%</b>	<b>4.9%</b>

## VACANT HOUSING

In regard to these vacant units, a portion of the vacant units in 2000 and 2010 were for rent or for seasonal or recreational use, and many came from the number of for-rent units which rose from roughly 44,000 to more than 65,000 units, by about 48 percent. Still, the rise in the number of homes for sale was also very large, with such units increasing by about 70 percent. Unfortunately, many housing units fell out of the housing market entirely, some not being for sale or for rent ("other vacant"). This group grew by 167 percent, from roughly 23,000 to 63,000 units. The NOACA region saw an increase of 137.6 percent, NEFCO about 160 percent, and Eastgate about 337 percent. These data are shown in Table II.15.



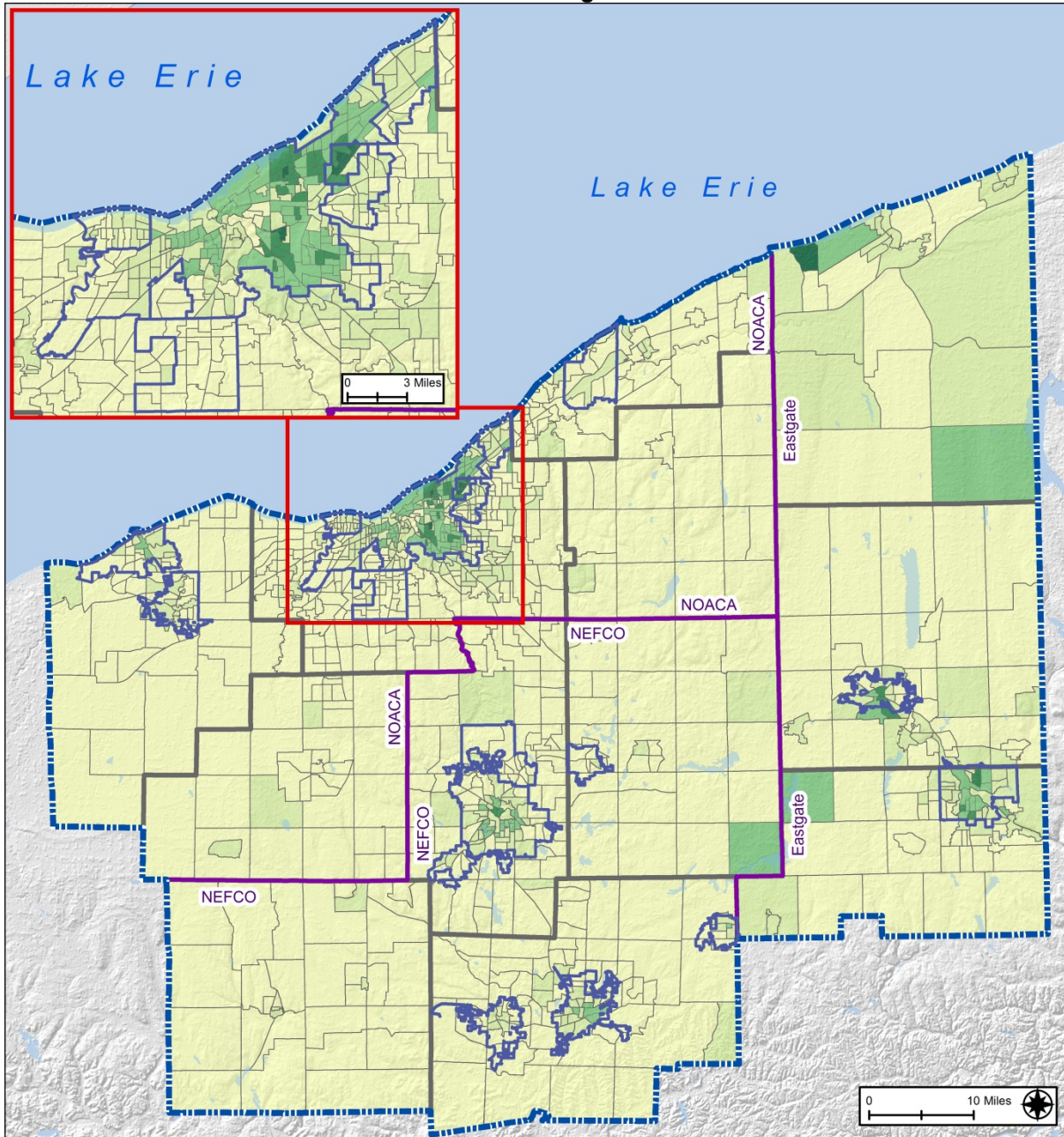
**Table II.15**  
**Disposition of Vacant Housing Units**  
 NEOSCC Region  
 2000 & 2010 Census SF1 Data

Disposition	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
NOACA Region					
For Rent	26,264	45.1%	41,037	40.7%	56.2%
For Sale	7,931	13.6%	14,782	14.7%	86.4%
Rented or Sold, Not Occupied	5,517	9.5%	5,336	5.3%	-3.3%
For Seasonal, Recreational, or Occasional Use	3,767	6.5%	4,788	4.7%	27.1%
For Migrant Workers	20	0.0%	16	0.0%	-20.0%
Other Vacant	14,692	25.2%	34,904	34.6%	137.6%
Total	58,191	100.0%	100,863	100.0%	73.3%
NEFCO Region					
For Rent	11,238	41.1%	15,963	35.5%	42.0%
For Sale	4,745	17.4%	7,708	17.2%	62.4%
Rented or Sold, Not Occupied	2,987	10.9%	2,546	5.7%	-14.8%
For Seasonal, Recreational, or Occasional Use	2,173	8.0%	2,846	6.3%	31.0%
For Migrant Workers	94	0.3%	13	0.0%	-86.2%
Other Vacant	6,089	22.3%	15,837	35.3%	160.1%
Total	27,326	100.0%	44,913	100.0%	64.4%
Eastgate Region					
For Rent	6,527	33.2%	8,143	27.1%	24.8%
For Sale	3,063	15.6%	4,260	14.2%	39.1%
Rented or Sold, Not Occupied	4,320	22.0%	1,478	4.9%	-65.8%
For Seasonal, Recreational, or Occasional Use	2,919	14.8%	3,727	12.4%	27.7%
For Migrant Workers	4	0.0%	5	0.0%	25.0%
Other Vacant	2,834	14.4%	12,396	41.3%	337.4%
Total	19,667	100.0%	30,009	100.0%	52.6%
NEOSCC Region					
For Rent	44,029	41.9%	65,143	37.1%	48.0%
For Sale	15,739	15.0%	26,750	15.2%	70.0%
Rented or Sold, Not Occupied	12,824	12.2%	9,360	5.3%	-27.0%
For Seasonal, Recreational, or Occasional Use	8,859	8.4%	11,361	6.5%	28.2%
For Migrant Workers	118	0.1%	34	0.0%	-71.2%
Other Vacant	23,615	22.5%	63,137	35.9%	167.4%
Total	105,184	100.0%	175,785	100.0%	67.1%

Map II.31 shows the concentration of vacant units per tract in 2010. The vacancy rate was 10.1 percent region-wide and several tracts demonstrated disproportionate shares of at least 20.1 percent. As shown in the map, these tended to be more highly concentrated in the Cleveland area, but several other jurisdictions also had high concentrations of vacant housing, such as in Youngstown. Interestingly, several areas in Ashtabula County also had this vacant housing issue.

The shares of “other vacant” units are presented in Map II.32. While there were indeed higher concentrations of other vacant housing in the urbanized areas, this problem is also seen in many areas far from the urbanized core of the NEOSCC Region.

**Map II.31**  
**Vacant Housing Units**



### LEGEND

#### 2010 Vacant Housing Unit Distribution

2010 Average Vacant Units Among All Census Tracts in the NEOSCC Region = 10.1%

Disproportionate Share Threshold = 20.1% (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.)

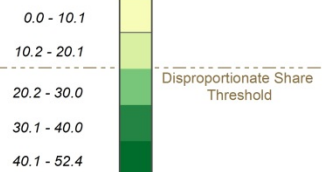
- Census Tract Boundaries
- Entitlement City Boundaries
- MPO/COG Boundaries

- NEOSCC Boundary

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

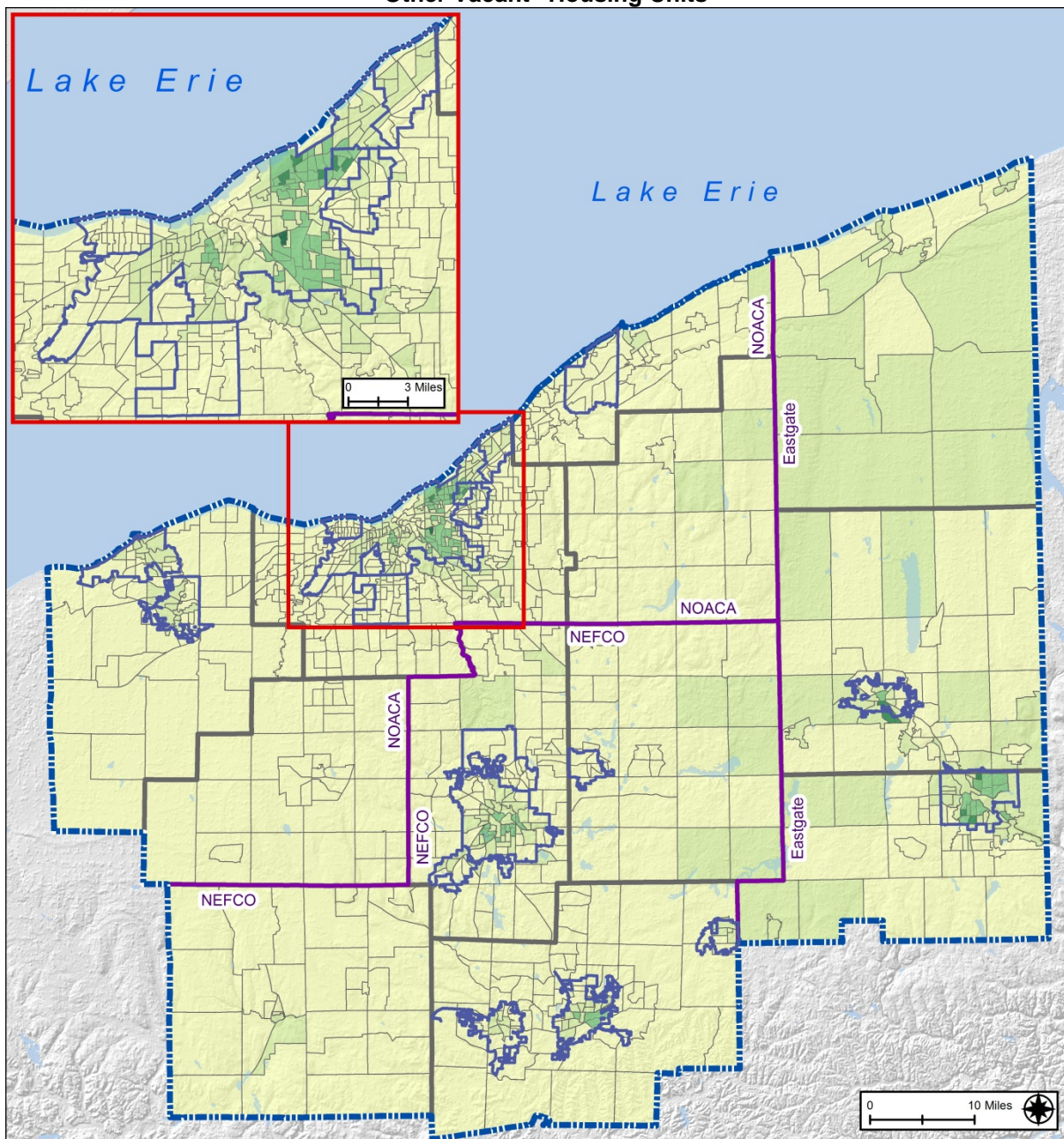
Data Source: 2010 Census

#### Percent Vacant





**Map II.32**  
**"Other Vacant" Housing Units**



### LEGEND

#### 2010 "Other Vacant" Housing Unit Distribution

2010 Average "Other Vacant" Units Among All Census Tracts in the NEOSCC Region = 3.6%

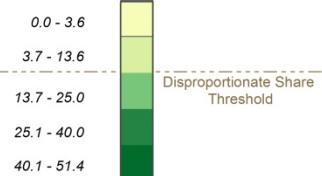
Disproportionate Share Threshold = 13.6% (A disproportionate share exists when the share of a population in a given area is at least 10 percentage points greater than the study area average.)

- Census Tract Boundaries
- Entitlement City Boundaries
- MPO/COG Boundaries
- NEOSCC Boundary

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

Data Source: 2010 Census

#### Percent "Other Vacant"





## HOUSEHOLD SIZE

Housing choices can also be examined by household size. The number of persons per household, as counted in the NEOSCC Region at the time of the 2000 and 2010 Censuses is presented in Table II.16. As shown, in 2000, 28.2 percent of households represented one-person households, with this rate rising to 30.5 in 2010. In fact, throughout the three MPO/COG areas, just the number of one-person households increased in all areas. Several age cohort groups declined, such as four-person households in Eastgate, the number of which fell by more than 16 percent. The declines in numbers of many larger households caused the total number of households to rise by only 0.7 percent, despite the overall population decline.

**Table II.16**  
**Households by Household Size**  
NEOSCC Region  
2000 & 2010 Census SF1 Data

Size	2000 Census		2010 Census		% Change 00-10
	Households	% of Total	Households	% of Total	
NOACA Region					
One Person	251,178	29.4%	271,617	31.8%	8.1%
Two Persons	273,297	32.0%	278,850	32.6%	2.0%
Three Persons	135,710	15.9%	129,948	15.2%	-4.2%
Four Persons	112,616	13.2%	101,837	11.9%	-9.6%
Five Persons	52,139	6.1%	46,182	5.4%	-11.4%
Six Persons	18,148	2.1%	16,709	2.0%	-7.9%
Seven Persons or More	10,077	1.2%	9,750	1.1%	-3.2%
Total	853,165	100.0%	854,893	100.0%	0.2%
NEFCO Region					
One Person	121,965	26.3%	135,870	28.4%	11.4%
Two Persons	158,753	34.3%	166,814	34.8%	5.1%
Three Persons	75,839	16.4%	75,302	15.7%	-0.7%
Four Persons	64,947	14.0%	59,952	12.5%	-7.7%
Five Persons	28,103	6.1%	26,311	5.5%	-6.4%
Six Persons	8,946	1.9%	9,376	2.0%	4.8%
Seven Persons or More	4,445	1.0%	5,105	1.1%	14.8%
Total	462,998	100.0%	478,730	100.0%	3.4%
Eastgate Region					
One Person	63,586	27.5%	67,064	29.9%	5.5%
Two Persons	77,589	33.6%	77,408	34.5%	-0.2%
Three Persons	38,040	16.5%	35,060	15.6%	-7.8%
Four Persons	31,140	13.5%	25,948	11.6%	-16.7%
Five Persons	13,603	5.9%	11,684	5.2%	-14.1%
Six Persons	4,566	2.0%	4,301	1.9%	-5.8%
Seven Persons or More	2,480	1.1%	2,621	1.2%	5.7%
Total	231,004	100.0%	224,086	100.0%	-3.0%
NEOSCC Region					
One Person	436,729	28.2%	474,551	30.5%	8.7%
Two Persons	509,639	32.9%	523,072	33.6%	2.6%
Three Persons	249,589	16.1%	240,310	15.4%	-3.7%
Four Persons	208,703	13.5%	187,737	12.1%	-10.0%
Five Persons	93,845	6.1%	84,177	5.4%	-10.3%
Six Persons	31,660	2.0%	30,386	2.0%	-4.0%
Seven Persons or More	17,002	1.1%	17,476	1.1%	2.8%
Total	1,547,167	100.0%	1,557,709	100.0%	0.7%

## HOUSING PROBLEMS

The 2000 Census reported some information regarding the physical condition of housing units.<sup>17</sup> These data relate to overcrowding, incomplete plumbing or kitchen facilities, and cost burdens, all of which can be considered as a housing problem. While these data were not collected during the course of the 2010 Census, data were available for comparison from the 2010 ACS.

### *Overcrowding*

Overcrowding occurs when a housing unit has more than one person per room but less than 1.5, with severe overcrowding occurring with 1.5 persons per room or more. At the time of the 2000 Census, 17,553 households, or 1.1 percent of the NEOSCC Region, were overcrowded, and another 6,370 or .4 percent of households were severely overcrowded, as shown in Table II.17. This housing problem was considerably more prevalent in renter-occupied households compared to owner-occupied households, with a slightly higher share of renters in the NOACA area experiencing overcrowding than shares elsewhere in the NEOSCC Region. On the other hand, overcrowding generally declined over the decade, as presented in the 2010 ACS data, with the share of severely overcrowded households decreasing significantly for both owner- and renter-occupied households.

### *Incomplete Facilities*

Incomplete plumbing or kitchen facilities are other indicators of potential housing problems. According to the Census Bureau, a housing unit is classified as lacking complete plumbing facilities when any of the following are not present: piped hot and cold water, a flush toilet, and a bathtub or shower. Likewise, a unit is categorized as deficient when any of the following are missing from the kitchen: a sink with piped hot and cold water, a range or cook top and oven, and a refrigerator.

At the time of the 2000 Census, 6,102 units, or .4 percent of all housing units in the Region, were lacking complete plumbing facilities, as shown in Table II.18. The 2010 ACS data showed that the percentage of units with this housing problem increased to an estimated 6,698 units, or .4 percent. As with overcrowding, the NOACA area tended to have a slightly higher rate of units lacking complete plumbing facilities.

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<sup>17</sup> Summary File 3 (SF3), as defined by the Census Bureau, “consists of 813 detailed tables of [the 2000 Census’] social, economic, and housing characteristics compiled from a sample of approximately 19 million housing units (about one in six households) that received the 2000 Census long-form questionnaire.” (U.S. Census Bureau 2011) These sample data include sampling error and may not sum precisely to the 100 percent sample typically presented in the 2000 Census.

**Table II.17**  
**Overcrowding and Severe Overcrowding**

NEOSCC Region  
 2000 Census SF3 & 2010 Five-Year ACS Data

Data Source	No Overcrowding		Overcrowding		Severe Overcrowding		Total
	Households	%	Households	%	Households	%	
NOACA Region							
Owner							
2000 Census	575,561	99.1%	4,270	0.7%	1,047	0.2%	580,878
2010 Five-Year ACS	572,560	99.4%	2,880	0.5%	480	0.1%	575,920
Renter							
2000 Census	263,441	96.8%	5,975	2.2%	2,871	1.1%	272,287
2010 Five-Year ACS	265,263	98.2%	3,771	1.4%	1,167	0.4%	270,201
Total							
2000 Census	839,002	98.3%	10,245	1.2%	3,918	0.5%	853,165
2010 Five-Year ACS	837,823	99.0%	6,651	0.8%	1,647	0.2%	846,121
NEFCO Region							
Owner							
2000 Census	327,613	99.2%	2,182	0.7%	476	0.1%	330,271
2010 Five-Year ACS	334,905	99.4%	1,798	0.5%	299	0.1%	337,002
Renter							
2000 Census	129,216	97.4%	2,408	1.8%	1,103	0.8%	132,727
2010 Five-Year ACS	138,672	98.2%	2,075	1.5%	508	0.4%	141,255
Total							
2000 Census	456,829	98.7%	4,590	1.0%	1,579	0.3%	462,998
2010 Five-Year ACS	473,577	99.0%	3,873	0.8%	807	0.2%	478,257
Eastgate Region							
Owner							
2000 Census	168,235	99.0%	1,353	0.8%	393	0.2%	169,981
2010 Five-Year ACS	163,017	99.2%	1,249	0.8%	127	0.1%	164,393
Renter							
2000 Census	59,178	97.0%	1,365	2.2%	480	0.8%	61,023
2010 Five-Year ACS	58,970	98.3%	700	1.2%	335	0.6%	60,005
Total							
2000 Census	227,413	98.4%	2,718	1.2%	873	0.4%	231,004
2010 Five-Year ACS	221,987	98.9%	1,949	0.9%	462	0.2%	224,398
NEOSCC Region							
Owner							
2000 Census	1,071,409	99.1%	7,805	0.7%	1,916	0.2%	1,081,130
2010 Five-Year ACS	1,070,482	99.4%	5,927	0.6%	906	0.1%	1,077,315
Renter							
2000 Census	451,835	97.0%	9,748	2.1%	4,454	1.0%	466,037
2010 Five-Year ACS	462,905	98.2%	6,546	1.4%	2,010	0.4%	471,461
Total							
2000 Census	1,523,244	98.5%	17,553	1.1%	6,370	0.4%	1,547,167
2010 Five-Year ACS	1,533,387	99.0%	12,473	0.8%	2,916	0.2%	1,548,776



**Table II.18**  
**Households with Incomplete Plumbing Facilities**

NEOSCC Region  
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 Five-Year ACS
<b>NOACA Region</b>		
With Complete Plumbing Facilities	849,780	842,039
Lacking Complete Plumbing Facilities	3,385	4,082
<b>Total Households</b>	<b>853,165</b>	<b>846,121</b>
<b>Percent Lacking</b>	<b>0.4%</b>	<b>0.5%</b>
<b>NEFCO Region</b>		
With Complete Plumbing Facilities	461,283	476,558
Lacking Complete Plumbing Facilities	1,715	1,699
<b>Total Households</b>	<b>462,998</b>	<b>478,257</b>
<b>Percent Lacking</b>	<b>0.4%</b>	<b>0.4%</b>
<b>Eastgate Region</b>		
With Complete Plumbing Facilities	230,002	223,481
Lacking Complete Plumbing Facilities	1,002	917
<b>Total Households</b>	<b>231,004</b>	<b>224,398</b>
<b>Percent Lacking</b>	<b>0.4%</b>	<b>0.4%</b>
<b>NEOSCC Region</b>		
With Complete Plumbing Facilities	1,541,065	1,542,078
Lacking Complete Plumbing Facilities	6,102	6,698
<b>Total Households</b>	<b>1,547,167</b>	<b>1,548,776</b>
<b>Percent Lacking</b>	<b>0.4%</b>	<b>0.4%</b>

Table II.19 shows the number of housing units with incomplete kitchen facilities in the Region. The most recent data reported slightly higher percentages of units with incomplete kitchen facilities than with incomplete plumbing facilities, with .5 percent of total units counted as incomplete in 2000 and .9 percent in 2010.

**Table II.19**  
**Households with Incomplete Kitchen Facilities**

NEOSCC Region  
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 Five-Year ACS
<b>NOACA Region</b>		
With Complete Kitchen Facilities	848,363	837,873
Lacking Complete Kitchen Facilities	4,802	8,248
<b>Total Households</b>	<b>853,165</b>	<b>846,121</b>
<b>Percent Lacking</b>	<b>0.6%</b>	<b>1.0%</b>
<b>NEFCO Region</b>		
With Complete Kitchen Facilities	460,599	474,686
Lacking Complete Kitchen Facilities	2,399	3,571
<b>Total Households</b>	<b>462,998</b>	<b>478,257</b>
<b>Percent Lacking</b>	<b>0.5%</b>	<b>0.7%</b>
<b>Eastgate Region</b>		
With Complete Kitchen Facilities	229,749	222,366
Lacking Complete Kitchen Facilities	1,255	2,032
<b>Total Households</b>	<b>231,004</b>	<b>224,398</b>
<b>Percent Lacking</b>	<b>0.5%</b>	<b>0.9%</b>
<b>NEOSCC Region</b>		
With Complete Kitchen Facilities	1,538,711	1,534,925
Lacking Complete Kitchen Facilities	8,456	13,851
<b>Total Households</b>	<b>1,547,167</b>	<b>1,548,776</b>
<b>Percent Lacking</b>	<b>0.5%</b>	<b>0.9%</b>

## ***Cost Burden***

The third type of housing problem reported in the 2000 Census was cost burden, which occurs when a household has gross housing costs that range from 30 to 49.9 percent of gross household income; severe cost burden occurs when gross housing costs represent 50 percent or more of gross household income. For homeowners, gross housing costs include property taxes, insurance, energy payments, water and sewer service, and refuse collection. If the homeowner has a mortgage, the determination also includes principal and interest payments on the mortgage loan. For renters, this figure represents monthly rent plus utility charges.

Table II.20 shows that 15.0 percent of households were cost burdened and 10.1 percent were severely cost burdened in 2000. Nationally at that time, the average Census figures were 16.2 and 11.5 percent, respectively. The 2010 ACS data averages showed that cost burden and severe cost burden increased to 23.5 and 19.7 percent, respectively. The rates also increased for the subcategories. For example, the rate of cost burden for owners with a mortgage increased to 21.4 percent and the rate of severe cost burden for this group increased to 12.0 percent. For renters, the cost burden rate rose to 25.0 percent, and the severe cost burden rate rose to 14.7 percent. These circumstances also tended to occur for the three MPO/COG areas.

Renters with a severe cost burden are at risk of homelessness. Cost-burdened renters who experience one financial setback often must choose between rent and food or rent and health care for their families. Similarly, homeowners with a mortgage who have just one unforeseen financial constraint—such as temporary illness, divorce, or the loss of employment—may face foreclosure or bankruptcy. Furthermore, households that no longer have a mortgage yet still experience a severe cost burden may be unable to conduct periodic maintenance and repair of their homes, and in turn, may contribute to a dilapidation and blight problem. All three of these situations should be of concern to policymakers and program managers.

**Table II.20**  
**Cost Burden and Severe Cost Burden by Tenure**

NEOSCC Region  
 2000 Census & 2010 Five-Year ACS Data

Data Source	Less Than 30%		31%-50%		Above 50%		Not Computed		Total
	Households	%	Households	%	Households	%	Households	%	
NOACA Region									
Owner With a Mortgage									
2000 Census	263,610	73.2%	63,071	17.5%	31,754	8.8%	1,445	0.4%	359,880
2010 Five-Year ACS	260,382	64.7%	89,198	22.2%	51,434	12.8%	1,427	0.4%	402,441
Owner Without a Mortgage									
2000 Census	136,509	87.7%	10,722	6.9%	6,334	4.1%	2,149	1.4%	155,714
2010 Five-Year ACS	140,063	80.7%	19,642	11.3%	12,252	7.1%	1,522	0.9%	173,479
Renter									
2000 Census	153,519	56.7%	49,684	18.4%	49,317	18.2%	18,074	6.7%	270,594
2010 Five-Year ACS	123,483	45.7%	57,579	21.3%	70,153	26.0%	18,986	7.0%	270,201
Total									
2000 Census	553,638	70.4%	123,477	15.7%	87,405	11.1%	21,668	2.8%	786,188
2010 Five-Year ACS	523,928	61.9%	166,419	19.7%	133,839	15.8%	21,935	2.6%	846,121
NEFCO Region									
Owner With a Mortgage									
2000 Census	155,365	76.8%	31,875	15.8%	14,438	7.1%	613	0.3%	202,291
2010 Five-Year ACS	158,152	68.5%	47,675	20.7%	24,273	10.5%	662	0.3%	230,762
Owner Without a Mortgage									
2000 Census	82,838	90.5%	4,748	5.2%	2,746	3.0%	1,201	1.3%	91,533
2010 Five-Year ACS	89,603	84.3%	9,979	9.4%	5,777	5.4%	881	0.8%	106,240
Renter									
2000 Census	77,705	59.3%	24,432	18.6%	20,549	15.7%	8,350	6.4%	131,036
2010 Five-Year ACS	67,032	47.5%	31,084	22.0%	33,245	23.5%	9,894	7.0%	141,255
Total									
2000 Census	315,908	74.4%	61,055	14.4%	37,733	8.9%	10,164	2.4%	424,860
2010 Five-Year ACS	314,787	65.8%	88,738	18.6%	63,295	13.2%	11,437	2.4%	478,257
Eastgate Region									
Owner With a Mortgage									
2000 Census	67,623	76.6%	13,242	15.0%	6,975	7.9%	389	0.4%	88,229
2010 Five-Year ACS	68,175	67.6%	19,867	19.7%	12,371	12.3%	395	0.4%	100,808
Owner Without a Mortgage									
2000 Census	51,249	89.3%	3,424	6.0%	1,896	3.3%	840	1.5%	57,409
2010 Five-Year ACS	53,472	84.1%	6,106	9.6%	3,549	5.6%	458	0.7%	63,585
Renter									
2000 Census	34,022	56.8%	10,744	17.9%	9,502	15.9%	5,647	9.4%	59,915
2010 Five-Year ACS	26,184	43.6%	13,281	22.1%	14,599	24.3%	5,941	9.9%	60,005
Total									
2000 Census	152,894	74.4%	27,410	13.3%	18,373	8.9%	6,876	3.3%	205,553
2010 Five-Year ACS	147,831	65.9%	39,254	17.5%	30,519	13.6%	6,794	3.0%	224,398
NEOSCC Region									
Owner With a Mortgage									
2000 Census	486,598	74.8%	108,188	16.6%	53,167	8.2%	2,447	0.4%	650,400
2010 Five-Year ACS	486,709	66.3%	156,740	21.4%	88,078	12.0%	2,484	0.3%	734,011
Owner Without a Mortgage									
2000 Census	270,596	88.8%	18,894	6.2%	10,976	3.6%	4,190	1.4%	304,656
2010 Five-Year ACS	283,138	82.5%	35,727	10.4%	21,578	6.3%	2,861	0.8%	343,304
Renter									
2000 Census	265,246	57.5%	84,860	18.4%	79,368	17.2%	32,071	6.9%	461,545
2010 Five-Year ACS	216,699	46.0%	101,944	21.6%	117,997	25.0%	34,821	7.4%	471,461
Total									
2000 Census	1,022,440	72.2%	211,942	15.0%	143,511	10.1%	38,708	2.7%	1,416,601
2010 Five-Year ACS	986,546	63.7%	294,411	19.0%	227,653	14.7%	40,166	2.6%	1,548,776



### *Housing and Transportation Affordability/Overburden*

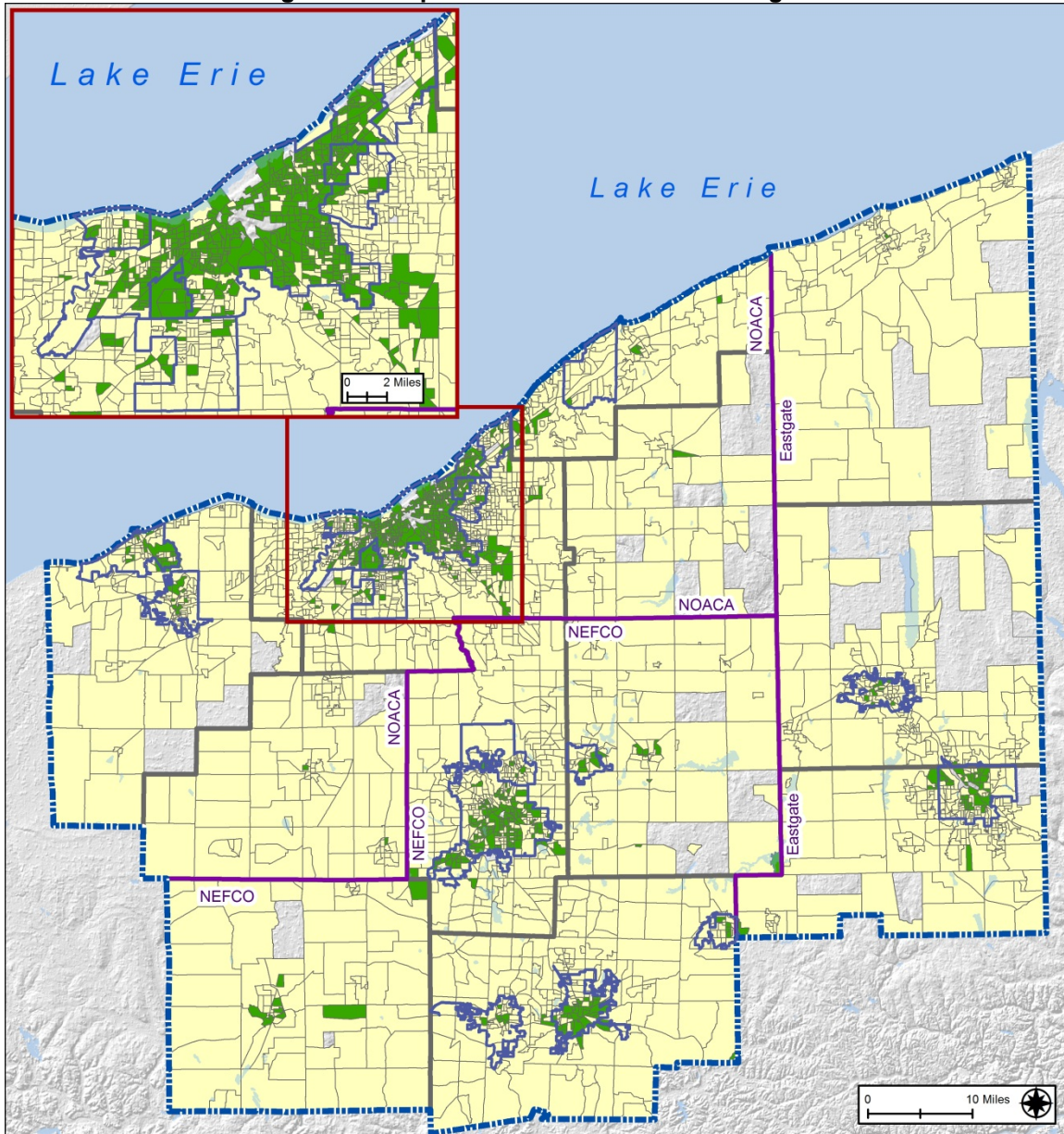
Center for Neighborhood Technology's (CNT's) Housing and Transportation (H+T<sup>®</sup>) Affordability Index provides a more comprehensive examination of housing and living costs, and therefore true affordability. The H+T<sup>®</sup> Index measures transportation costs in addition to housing costs, at a neighborhood (Census block group) level.

The 2009 H+T<sup>®</sup> Index uses data from the 2005–2009 ACS, uses the median selected monthly owner costs (for owners with a mortgage) and median gross rent (for renters paying cash rent) to measure housing costs. Housing costs plus typical housing costs are compared to the area median income (AMI) for each area to determine the percentage of income spent on these expenses (calculated using AMI, area average household size, and area average commuters per household).

The H+T<sup>®</sup> Index shows that transportation costs vary between and within areas depending on neighborhood characteristics. Households in location-efficient neighborhoods—compact, mixed use, and with convenient access to jobs, services, transit, and amenities—tend to have lower transportation costs. People who live in location-inefficient places that require automobiles for most trips are more likely to have high transportation costs. Households spending 45.0 percent or more of their income on housing and transportation costs, excluding the cost of gasoline, are considered to be living in “unaffordable” locations and are “overburdened” by their housing and transportation costs.

As shown in Map II.33, households in most block groups in the NEOSCC Region spent more than 45.0 percent of their incomes on housing and transportation, with only a few block groups outside urban areas experiencing a lower average rate. The majority of the block groups deemed affordable by the H+T<sup>®</sup> Index were located in large cities, primarily Cleveland, Akron, Canton, and Youngstown.

**Map II.33**  
**Housing and Transportation Costs as a Percentage of AMI**



#### LEGEND

##### H+T® Affordability Index

The H+T® Affordability Index measures housing and transportation costs as a percentage of AMI. The Index was calculated for each block group using AMI, area average household size, and area average commuters per household.

- Block Group Boundaries
- Entitlement City Boundaries
- MPO/COG Boundaries

Data Source: 2009 CNT

- No Data
- NEOSCC Boundary

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

Housing and Transportation Costs as Percent of AMI

- 23.0 - 45.0
- More than 45.0

## HOUSING COSTS

The five-year ACS estimates also report data on housing costs, such as median contract rent and median home value. These figures are reported as median values per Census tract; as well as other Census geographies. However, the mean or median values cannot be computed for the entire NEOSCC Region, or any of the MPO/COG areas. Still, such values can be presented by Census tract, as with other concepts presented throughout this document.

### ***Rental Housing Costs***

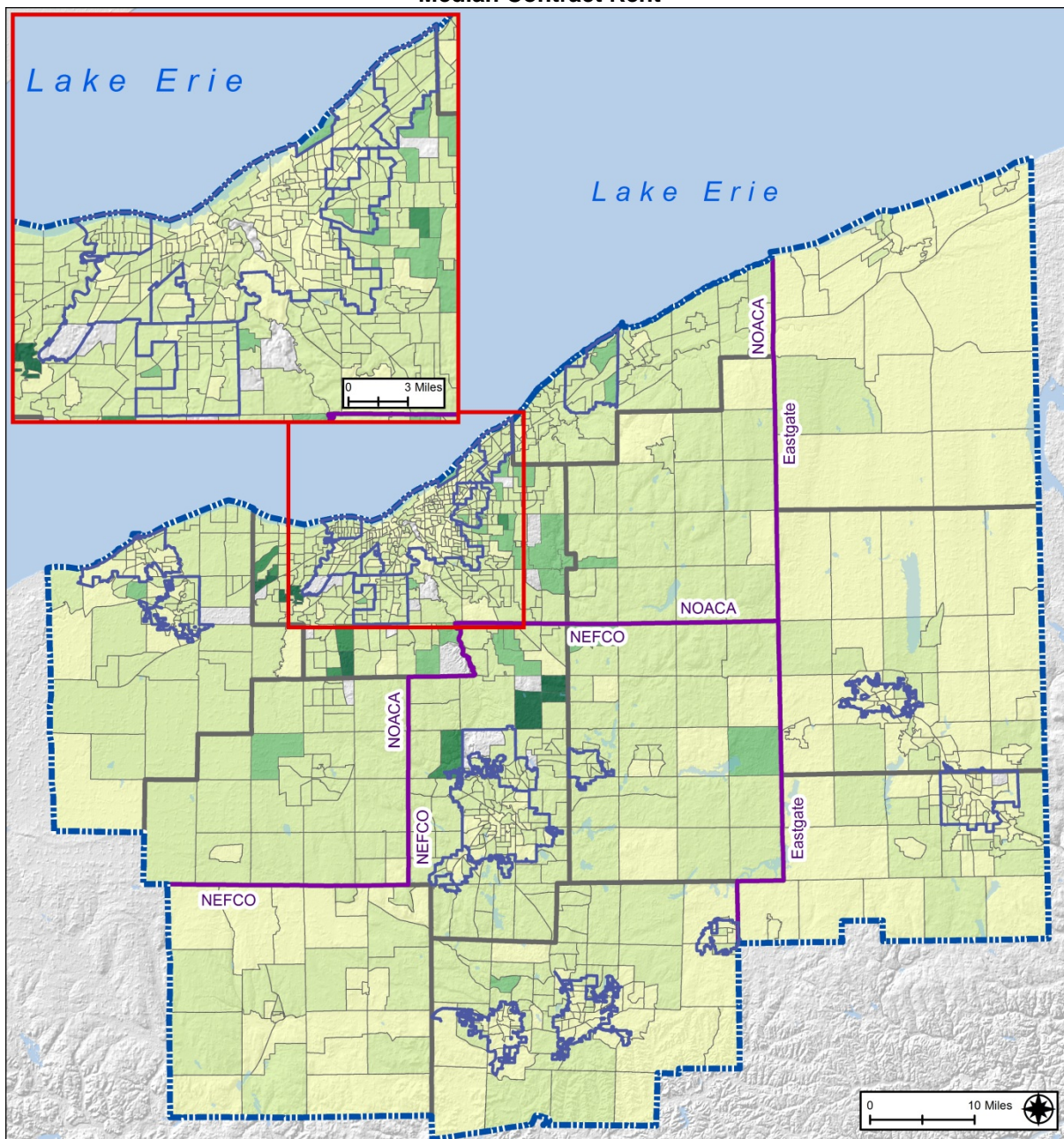
Map II.34 presents data on median contract rent prices by Census tract. In general, the highest contract rents were seen outside of the urbanized areas.

### ***Owner-Occupied Housing Costs***

The distribution of owner-occupied home values in the NEOSCC Region as reported in the 2010 ACS is presented in Map II.35. A few similarities can be seen when comparing this map to the previous map; the areas with the highest home values were also in tracts surrounding the urbanized areas, especially Cleveland.



**Map II.34**  
**Median Contract Rent**



### LEGEND

#### 2006–2010 Median Contract Rent Distribution

2006–2010 Median Contract Rent Among All Census Tracts in Ohio = \$532

- Census Tract Boundaries
- Entitlement City Boundaries
- MPO/COG Boundaries

- NEOSCC Boundary

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

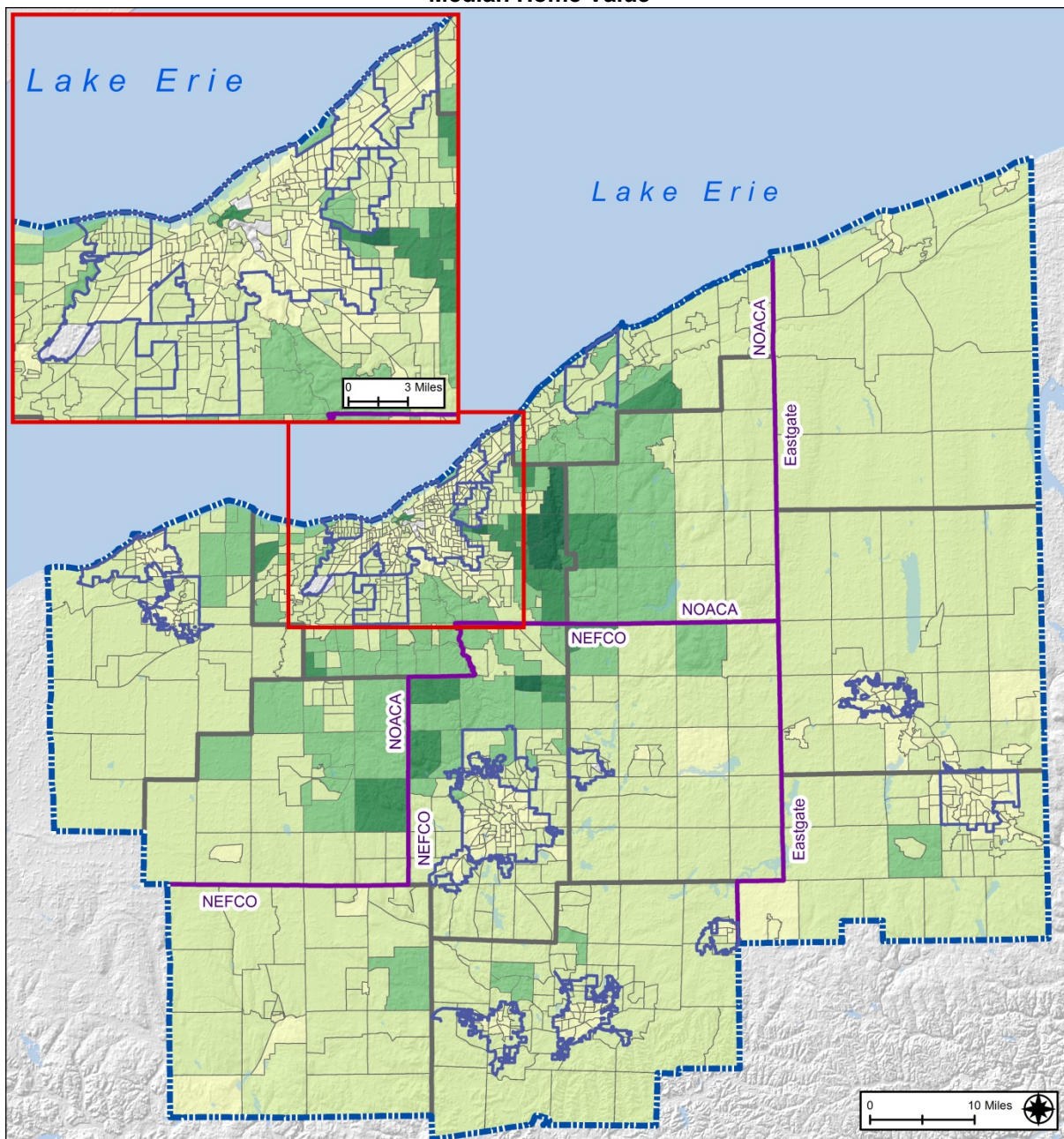
Data Source: 2006–2010 ACS

#### Median Contract Rent

- \$99 - 500
- 501 - 1,000
- 1,001 - 1,500
- 1,501 - 2,000
- More than \$2,000



**Map II.35**  
**Median Home Value**



### LEGEND

#### 2006–2010 Median Home Value Distribution

2006–2010 Median Home Value Among All Census Tracts in Ohio = \$136,400

- Census Tract Boundaries
- Entitlement City Boundaries
- MPO/COG Boundaries

NEOSCC Boundary

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

Data Source: 2006–2010 ACS

#### Median Home Value

- \$12,600 - 100,000
- 100,001 - 200,000
- 200,001 - 300,000
- 300,001 - 400,000
- 400,001 - 553,900



## F. AREAS OF OPPORTUNITY

One of the key provisions of preparing the NEOSCC's Fair Housing and Equity Assessment (FHEA) is to develop a shared understanding of the dynamics that enhance, or limit, opportunity. One of the purposes of addressing this issue is to open a Regional discussion about factors and investments that promote opportunity. Existing areas of opportunity are physical places, areas within communities that provide everything one needs to thrive, including quality employment, good schools, affordable housing, efficient public transportation, safe streets, services, parks, and full-service grocery stores. Areas lacking opportunity, then, have the opposite of these attributes. Sustained exposure to highly distressed neighborhoods is associated with higher drop-out rates and lower economic performance. Hence, it is the disparities in access to opportunity, or community assets, that negatively impacts the provision of quality education and economic advancement. Persons with greater exposure to asset rich neighborhoods realize many gains, both educational and in terms of economic well-being. Equitable development requires thinking about equity impacts at the front end, prior to the investment occurring.<sup>18</sup> Defining the opportunity areas for the NEOSCC Region comprised assembling key data to create an opportunity index with values ranging from zero, an area having no opportunity, to one—an area having perfect opportunity.

Data selected were derived from several sources, such as the PDR FHEA databases, Home Mortgage Disclosure Act information (discussed later in this document) as well as the 2010 Census and the 2010 ACS. Table II.21 presents a matrix of factors in five categories: education, economic conditions, housing, transportation, and health. The values in parenthesis represent the weighting that each of these categories is given, just as the parenthetical values following the category variables

**Table II.21**  
**Opportunity Index Area Calculation Matrix**

NEOSCC Region

2012 HUD PDR, 2004–2011 HMDA, 2010 SF1, and 2010 Five-Year ACS Data

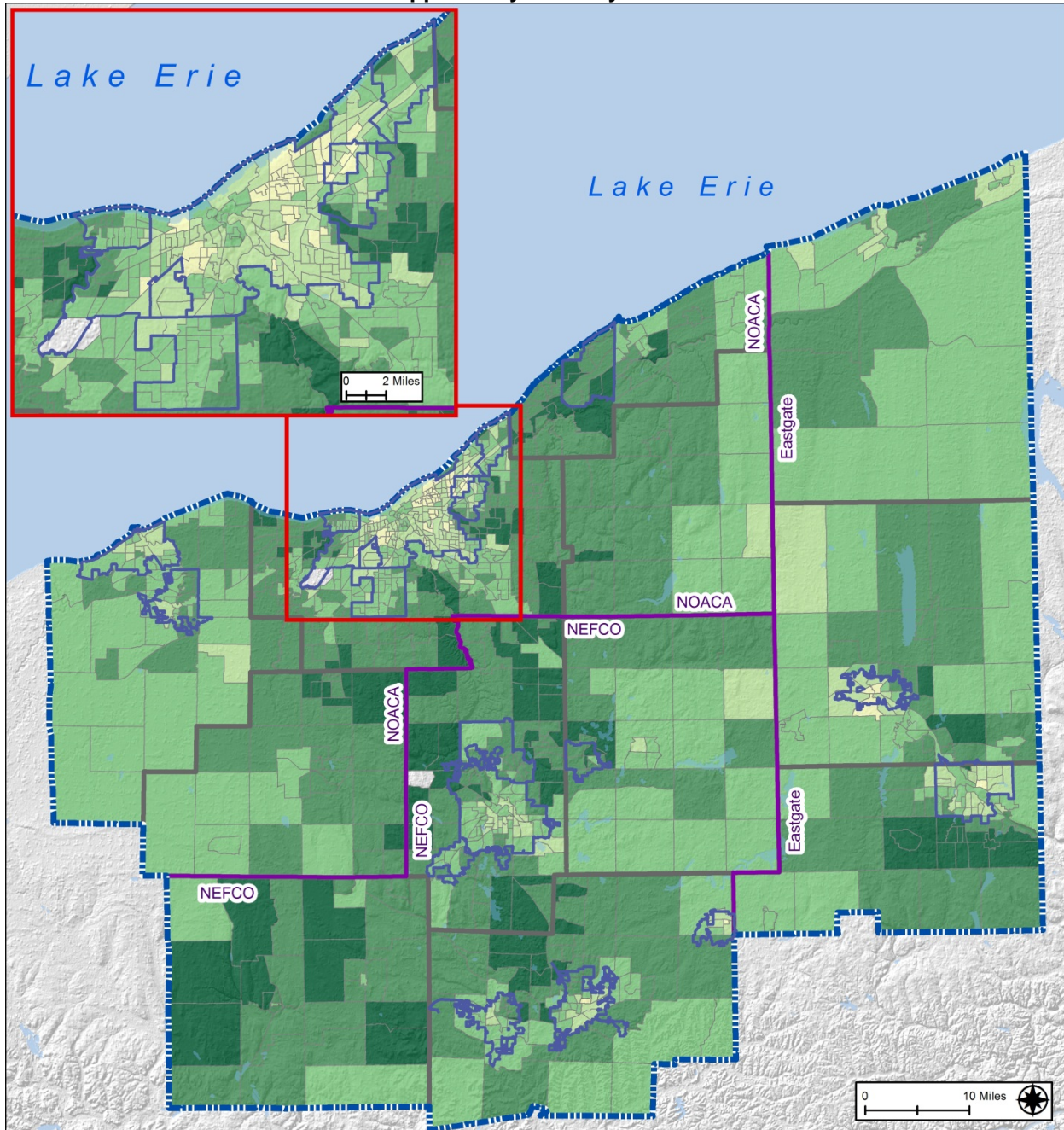
<b>Education (22.5%)</b>	<b>Economic (22.5%)</b>	<b>Housing (22.5%)</b>	<b>Transportation (22.5)</b>	<b>Health (10%)</b>
School Proficiency Index (50%)	Labor Market Index (100%)	% Occupied Housing Units (25%)	High Quality Transit Services Index (50%)	Environmental Index (100%)
High School Graduation Rate (50%)		Homeownership rate (25%)	Travel Time to Work Index (50%)	
		% No Overcrowding (25%)		
		% Non-HAL Loans (25%)		

The resulting Opportunity Index, mapped throughout the Region is presented in Map II.36, on the following page.

<sup>18</sup> Regional Equity and the Quest for Full Inclusion. PolicyLink, 2008.



**Map II.36**  
**Opportunity Index by Tract**



## LEGEND

### Opportunity Indicator Index

Opportunity is measured as an average of education, economic, housing, transportation and health factors, as measured through 2004–2010 HMDA data, 2010 Census data, and 2012 HUD PDR data. An index score of 0 represents few opportunities; a score of 1 represents many opportunities for education, economic, housing, and transportation choices.

- Census Tract Boundaries
- Entitlement City Boundaries
- Housing Market Boundaries

NEOSCC Boundary

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

### Opportunity Index

- 0.24 - 0.36
- 0.37 - 0.48
- 0.49 - 0.61
- 0.62 - 0.73
- 0.74 - 0.85



Data Source: 2012 HUD PDR, 2004–2011 HMDA, 2010 Census SF1, and 2010 ACS

## G. SUMMARY

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Analysis of demographic, economic, and housing data provides information about the level and results of past locational choices. As observed, the same areas in the region contain several problematic concerns. This includes over concentrations of racial and ethnic minorities, high rates of poverty, notable racially and ethnically concentrated areas of poverty, and often areas that lack transportation connections between areas of low-income and employment opportunities. Furthermore, the spatial distribution of areas lacking opportunity tended to correlate highly with the above-listed areas.





### III. FAIR HOUSING ENVIRONMENT

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The purpose of this section is to provide a profile of the fair housing infrastructure in the NEOSCC Region. This includes an enumeration of key agencies and organizations that contribute to affirmatively furthering fair housing, an evaluation of the presence and scope of services of existing fair housing organizations, and a review of the complaint process.

#### A. FAIR HOUSING INFRASTRUCTURE

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##### FAIR HOUSING AGENCIES

###### *U.S. Department of Housing and Urban Development*

The U.S. Department of Housing and Urban Development (HUD) oversees, administers, and enforces the federal Fair Housing Act. HUD's regional office in Chicago oversees housing, community development, and fair housing enforcement in Illinois, Indiana, Michigan, Minnesota, Ohio, and Wisconsin. The Office of Fair Housing and Equal Opportunity (FHEO) within HUD's Chicago office enforces the Fair Housing Act and other civil rights laws that prohibit discrimination in housing, mortgage lending, and other related transactions in Ohio. HUD also provides education and outreach, monitors agencies that receive HUD funding for compliance with civil rights laws, and works with state and local agencies under the Fair Housing Assistance Program (FHAP) and Fair Housing Initiative Program (FHIP), as described below.

###### *Fair Housing Assistance Program*

In the U.S., many state and local agencies have an ordinance or law that empowers a state or local governmental agency to enforce the state or local fair housing law. If HUD determines that the local entity can operate on a "substantially equivalent" level to federal agency enforcement activities, HUD contracts with that agency to process fair housing complaints and reimburses the jurisdiction on a per case basis. FHAP grants are awarded to public, not private, entities and are given on a noncompetitive, annual basis to substantially equivalent state and local fair housing enforcement agencies.

When substantially equivalent status has been granted, complaints of housing discrimination are dually filed with the state or local agency and HUD, with the state or local agency investigating most complaints. When federally subsidized housing is involved, however, HUD will typically investigate the complaint. Regardless, the state or local agency is reimbursed for complaint intake and investigation and is awarded funds for fair housing training and education.

**FHAP Recipients in the NEOSCC Region:** In the NEOSCC Region, the Ohio Civil Rights Commission (OHRC), the City of Canton Fair Housing Commission, the City of North Olmstead, and the Shaker Heights Fair Housing Review Board receive FHAP funds.

### *Fair Housing Initiative Program*

A FHIP participant may be a government agency, a private nonprofit, or a for-profit organization. FHIPs are funded through a competitive grant program that provides funds to organizations to carry out projects and activities designed to enforce and enhance compliance with fair housing law. Eligible activities include education and outreach to the public and the housing industry on fair housing rights and responsibilities as well as enforcement activities in response to fair housing complaints, such as testing and litigation.

The following FHIP initiatives, as defined on HUD's website, provide funds and competitive grants to eligible organizations:

*The Fair Housing Organizations Initiative (FHOI)* provides funding that builds the capacity and effectiveness of non-profit fair housing organizations by providing funds to handle fair housing enforcement and education initiatives more effectively. FHOI also strengthens the fair housing movement nationally by encouraging the creation and growth of organizations that focus on the rights and needs of underserved groups, particularly persons with disabilities.

[Eligible Grantees:] Applicants must be qualified fair housing enforcement organizations with at least two years of experience in complaint intake, complaint investigation, testing for fair housing violations, and meritorious claims in the three years prior to the filing of their application.

[Eligible Activities:] Grants may be used flexibly to support the basic operation and activities of new and existing non-profit fair housing organizations.

*The Private Enforcement Initiative (PEI)* offers a range of assistance to the nationwide network of fair housing groups. This initiative funds non-profit fair housing organizations to carry out testing and enforcement activities to prevent or eliminate discriminatory housing practices.

[Eligible Grantees:] Fair housing enforcement organizations that meet certain requirements related to the length and quality of previous fair housing enforcement experience may apply for FHIP-PEI funding.

[Eligible Activities:] Funds such activities as conducting complaint-based and targeted testing and other investigations of housing discrimination, linking fair-housing organizations in regional enforcement activities, and establishing effective means of meeting legal expenses in support of fair housing litigation.

*The Education and Outreach Initiative (EOI)* offers a comprehensive range of support for fair housing activities, providing funding to State and local government agencies and non-profit organizations for initiatives that explain to the general public and housing providers what equal opportunity in housing means and what housing providers need to do to comply with the Fair Housing Act.

[Eligible Grantees:] State or local governments, qualified fair housing enforcement organizations (those with at least 2 years of experience), other fair housing

organizations, and other public or private nonprofit organizations representing groups of persons protected by the Fair Housing Act may apply for FHIP-EOI funding.

[Eligible Activities:] Funds a broad range of educational activities that can be national, regional, local, or community-based in scope. Activities may include developing education materials, analyzing local impediments to housing choice, providing housing counseling and classes, convening meetings that bring together the housing industry with fair housing groups, developing technical materials on accessibility, and mounting public information campaigns. National projects that demonstrate cooperation with the real estate industry or focus on resolving the community tensions that arise as people expand their housing choices may be eligible to receive preference points.

*The Administrative Enforcement Initiative (AEI)* helps State and local governments who administer laws that include rights and remedies similar to those in the Fair Housing Act implement specialized projects that broaden an agency's range of enforcement and compliance activities. No funds are available currently for this program.

**FHIP Grants in the NEOSCC Region:** From 2008 to 2013, five agencies in the NEOSCC Region received FHIP grants. The Fair Housing Contact Service; Community Legal Aid Services; Housing Advocates, Inc.; the Housing Research and Advocacy Center; and the Fair Housing Resource Center, Inc. received funding for specific goals and program activities in those years, as shown in Table III.1.

**Table III.1**  
**FHIP Grantees**  
NEOSCC Region  
2008–2012 HUD Data

Agency/Area	2008 <sup>19</sup>	2009 <sup>20</sup>	2010 <sup>21</sup>	2011 <sup>22</sup>	2012 <sup>23</sup>
Fair Housing Contact Service	PEI Performance-Based \$275,000	Yes	PEI-PBC \$275,000	PEI-MY	Yes
Community Legal Aid Services, Inc.				EOI-L	
Housing Advocates, Inc.	PEI Performance-Based \$275,000	Yes	PEI-PBC \$275,000		
Housing Research and Advocacy Center	PEI Performance-Based \$275,000	Yes	PEI-PBC \$325,000	PEI-PB	Yes
Fair Housing Resource Center, Inc.	PEI Performance-Based \$275,000	Yes	PEI-PBC \$275,000	PEI-MY	Yes

<sup>19</sup> (HUD FHEO 2008) 2008 FHIP Grants

<sup>20</sup> (HUD FHEO 2009) 2009 FHIP Grants

<sup>21</sup> (HUD FHEO 2010) 2010 FHIP Grants

<sup>22</sup> (HUD FHEO 2011) 2011 FHIP Grants

<sup>23</sup> (HUD FHEO 2012) 2012 FHIP Grants



## **State Agencies**

### *Ohio Civil Rights Commission*

The OCRC exists within the State as an FHAP, meaning that the agency is considered substantially equivalent to HUD. As an FHAP, the OCRC is able to accept fair housing and process fair housing complaints.

The central office of the OCRC is in Columbus, and the agency has seven regional offices across the State.

The OCRC was established in 1959 by the Ohio Legislature. Its primary function is to enforce Ohio anti-discrimination laws, and it receives and investigates charges of discrimination in employment, places of public accommodation, housing, credit, and disability in higher education on the bases of race, color, religion, sex, national origin, disability, age, ancestry, military status, or familial status.

## **Local Agencies**

As mentioned previously, within the NEOSCC Region there are four FHAP agencies: the OCRC, the City of Canton Fair Housing Commission, the City of North Olmstead, and the Shaker Heights Fair Housing Review Board. There are five FHIP agencies: the Fair Housing Contact Service; Community Legal Aid Services; Housing Advocates, Inc.; the Housing Research and Advocacy Center; and the Fair Housing Resource Center, Inc. Thus, for this Regional AI addressing the Region, no additional local agencies are reviewed.

## **COMPLAINT PROCESS REVIEW**

### ***U.S. Department of Housing and Urban Development***

According to HUD's website, any person who feels that his or her housing rights have been violated may submit a complaint to HUD via phone, mail, or the internet. A complaint can be submitted to the national HUD office at:

Office of Fair Housing and Equal Opportunity  
Department of Housing and Urban Development  
451 Seventh Street SW, Room 5204  
Washington, DC 20410-2000  
Telephone: (202) 708-1112  
Toll Free: (800) 669-9777  
<http://www.HUD.gov/offices/fheo/online-complaint.cfm>

For Ohio, the contact information for the regional HUD fair housing office in Chicago is:

Chicago Regional Office of FHEO  
U.S. Department of Housing and Urban Development  
Ralph H. Metcalfe Federal Building

77 West Jackson Boulevard, Room 2101  
Chicago, Illinois 60604-3507  
(312) 353-7776 ext. 2453  
(800) 765-9372  
TTY (312) 353-7143

When a complaint is submitted, intake specialists review the information and contact the complainant in order to gather additional details and determine if the case qualifies as possible housing discrimination. Complaints specific to a state or locality that is part of HUD's FHAP organizations are referred to the appropriate parties, who have 30 days to address the complaint. If HUD is handling the case, the formal complaint is sent to the complainant for review and then sent to the alleged violator for review and response.

Next, the circumstances of the complaint are investigated through conducting interviews and examining relevant documents. During this time, the investigator attempts to rectify the situation through conciliation, if possible. The case is closed if conciliation of the two parties is achieved or if the investigator determines that there was no reasonable cause of discrimination. If reasonable cause is found, then either a federal judge or a HUD Administrative Law Judge hears the case and determines damages, if any.<sup>24</sup> A respondent may be ordered to:

- Compensate for actual damages, including humiliation, pain, and suffering;
- Provide injunctive or other equitable relief to make the housing available;
- Pay the federal government a civil penalty to vindicate the public interest, with a maximum penalty of \$10,000 for a first violation and \$50,000 for an additional violation within seven years; and/or
- Pay reasonable attorneys' fees and costs.<sup>25</sup>

### ***Ohio Civil Rights Commission***

Housing complaints must be filed with the OCRC within one year of the alleged discriminatory act. Official Charge of Discrimination forms are available on the OCRC website or in person, and can be submitted by mail or at a regional office. Complaints can be mailed to any of the seven OCRC offices.

### ***Local Agencies***

Complaints can also be filed with one of the following local agencies in the NEOSCC Region:

- Fair Housing Contact Service,
- Housing Advocates, Inc.,
- Housing Research and Advocacy Center,
- Fair Housing Advocates Association,
- Fair Housing Resource Center, Inc.,
- Fair Housing Review Board,

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<sup>24</sup> (HUD FHEO n.d.)

<sup>25</sup> (HUD FHEO n.d.)

- City of Canton Fair Housing,
- City of North Olmsted Law and Fair Housing, or
- Cleveland Fair Housing Board.

## **B. SUMMARY**

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A review of the fair housing profile in the NEOSCC Region revealed that several organizations provide fair housing services on the federal, state, and local levels. They all provide outreach and education, complaint intake, and testing and enforcement activities for both providers and consumers of housing. Examples include HUD; the Ohio Civil Rights Commission; the Fair Housing Contact Service Housing Advocates, Inc.; the Housing Research and Advocacy Center; and the Fair Housing Resource Center, Inc.



## IV. BARRIERS TO HOUSING CHOICE IN THE PRIVATE SECTOR

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As part of the Regional AI process, HUD suggests that the analysis focus on possible housing discrimination issues in both the private and public sectors. Examination of housing factors in the NEOSCC Region's public sector is presented in **Section V**, while this section focuses on research regarding the Region's private sector, including the mortgage lending market, the real estate market, the rental market, and other private sector housing industries.

### A. LENDING ANALYSIS

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Since the 1970s, the federal government has enacted several laws aimed at promoting fair lending practices in the banking and financial services industries. A brief description of selected federal laws aimed at promoting fair lending follows:

- The 1968 Fair Housing Act prohibits discrimination in housing based on race, color, religion, and national origin. Later amendments added sex, familial status, and disability. Under the Fair Housing Act, it is illegal to discriminate against any of the protected classes in the following types of residential real estate transactions: making loans to buy, build, or repair a dwelling; selling, brokering, or appraising residential real estate; and selling or renting a dwelling.
- The Equal Credit Opportunity Act was passed in 1974 and prohibits discrimination in lending based on race, color, religion, national origin, sex, marital status, age, receipt of public assistance, and the exercise of any right under the Consumer Credit Protection Act.
- The Community Reinvestment Act was enacted in 1977 and requires each federal financial supervisory agency to encourage financial institutions in order to help meet the credit needs of the entire community, including low- and moderate-income neighborhoods.
- Under the Home Mortgage Disclosure Act (HMDA), enacted in 1975 and later amended, financial institutions are required to publicly disclose the race, sex, ethnicity, and household income of mortgage applicants by the Census tract in which the loan is proposed as well as outcome of the loan application.<sup>26</sup> The analysis presented herein is from the HMDA data system.

### HOME MORTGAGE DISCLOSURE ACT

The HMDA requires both depository and non-depository lenders to collect and publicly disclose information about housing-related applications and loans.<sup>27</sup> Both types of lending institutions must meet the following set of reporting criteria:

- The institution must be a bank, credit union, or savings association;
- The total assets must exceed the coverage threshold;<sup>28</sup>

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<sup>26</sup> (Federal Reserve Bank of Boston 1993)

<sup>27</sup> Data are considered "raw" because they contain entry errors and incomplete loan applications. Starting in 2004, the HMDA data made significant changes in reporting, particularly regarding ethnicity data, loan interest rates, and the multi-family loan applications.

- The institution must have had an office in a Metropolitan Statistical Area (MSA);
- The institution must have originated at least one home purchase loan or refinancing of a home purchase loan secured by a first lien on a one- to four-family dwelling;
- The institution must be federally insured or regulated; and
- The mortgage loan must have been insured, guaranteed, or supplemented by a federal agency or intended for sale to the Federal National Mortgage Association (FNMA or Fannie Mae) or the Federal Home Loan Mortgage Corporation (FHLMC or Freddie Mac). These agencies purchase mortgages from lenders and repackage them as securities for investors, making more funds available for lenders to make new loans.

For other institutions, including non-depository institutions, additional reporting criteria are as follows:

- The institution must be a for-profit organization;
- The institution's home purchase loan originations must equal or exceed 10 percent of the institution's total loan originations, or more than \$25 million;
- The institution must have had a home or branch office in an MSA or have received applications for, originated, or purchased five or more home purchase loans, home improvement loans, or refinancing mortgages on property located in an MSA in the preceding calendar year; and
- The institution must have assets exceeding \$10 million or have originated 100 or more home purchases in the preceding calendar year.

HMDA data represent most mortgage lending activity and are thus the most comprehensive collection of information available regarding home purchase originations, home remodel loan originations, and refinancing. The Federal Financial Institutions Examination Council (FFIEC) makes HMDA data available on its website. While HMDA data are available for more years than are presented in the following pages, modifications were made in 2004 for documenting loan applicants' race and ethnicity, so data are most easily compared after that point.

### ***Home Purchase Loans***

As presented in Table IV.1, HMDA information was collected for all Census tracts in the NEOSCC Region from 2004 through 2011. During this time, 2,061,073 loan applications were reported by participating institutions for home purchases, home improvements, and refinancing mortgages. Of these loan applications, 687,211 were specifically for home purchases. NOACA had slightly less than 55 percent of all loan applications over the eight-year period, with 1.1 million loan applications. NEFCO had 657,499 applications, or nearly 32 percent; and, the Eastgate region had the remainder, at 13.4 percent of all loan applications.

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<sup>28</sup> Each December, the Federal Reserve announces the threshold for the following year. The asset threshold may change from year to year based on changes in the Consumer Price Index for Urban Wage Earners and Clerical Workers.

**Table IV.1**  
**Purpose of Loan by Year**

NEOSCC Region  
2004–2011 HMDA Data

Purpose	2004	2005	2006	2007	2008	2009	2010	2011	Total
<b>NOACA Region</b>									
Home Purchase	69,464	79,904	76,175	50,408	33,884	31,515	27,385	24,821	393,556
Home Improvement	15,734	17,680	17,701	15,866	11,902	7,190	5,430	5,741	97,244
Refinancing	124,739	120,600	96,081	69,597	47,250	64,771	59,944	53,398	636,380
<b>Total</b>	<b>209,937</b>	<b>218,184</b>	<b>189,957</b>	<b>135,871</b>	<b>93,036</b>	<b>103,476</b>	<b>92,759</b>	<b>83,960</b>	<b>1,127,180</b>
<b>NEFCO Region</b>									
Home Purchase	36,838	42,617	39,787	27,613	18,913	17,741	15,860	15,196	214,565
Home Improvement	8,297	9,784	9,529	7,813	5,697	3,069	2,254	2,339	48,782
Refinancing	76,922	72,579	63,401	45,085	29,272	39,685	36,263	30,945	394,152
<b>Total</b>	<b>122,057</b>	<b>124,980</b>	<b>112,717</b>	<b>80,511</b>	<b>53,882</b>	<b>60,495</b>	<b>54,377</b>	<b>48,480</b>	<b>657,499</b>
<b>Eastgate Region</b>									
Home Purchase	13,937	15,969	15,116	10,386	6,906	5,958	5,369	5,449	79,090
Home Improvement	4,869	5,901	5,187	4,656	3,017	1,733	1,516	1,295	28,174
Refinancing	33,414	32,851	28,471	20,223	13,880	14,949	13,603	11,739	169,130
<b>Total</b>	<b>52,220</b>	<b>54,721</b>	<b>48,774</b>	<b>35,265</b>	<b>23,803</b>	<b>22,640</b>	<b>20,488</b>	<b>18,483</b>	<b>276,394</b>
<b>NEOSCC Region</b>									
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
<b>Total</b>	<b>384,214</b>	<b>397,885</b>	<b>351,448</b>	<b>251,647</b>	<b>170,721</b>	<b>186,611</b>	<b>167,624</b>	<b>150,923</b>	<b>2,061,073</b>

Within the context of this study, housing choice, it is important to evaluate owner-occupied home purchase transactions. The home improvement and refinancing loan application categories typically apply to housing choices that have already been made. As shown in Table IV.2, of the 687,211 home purchase loan applications submitted during the period in the NEOSCC Region, 614,143 were specifically for owner-occupied homes.

However, the NOACA Region had a larger share of owner-occupied home loan applications, 56.8 percent, compared to the NEFCO share of 31.6 percent and the Eastgate share of 22.7 percent.

**Table IV.2**  
**Occupancy Status for Home Purchase Loan Applications**

NEOSCC Region  
 2004–2011 HMDA Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	Total
<b>NOACA Region</b>									
Owner-Occupied	61,246	69,033	64,286	43,602	30,980	30,075	26,124	23,421	348,767
Not Owner-Occupied	7,715	10,588	11,699	6,631	2,847	1,410	1,190	1,365	43,445
Not Applicable	503	283	190	175	57	30	71	35	1,344
<b>Total</b>	<b>69,464</b>	<b>79,904</b>	<b>76,175</b>	<b>50,408</b>	<b>33,884</b>	<b>31,515</b>	<b>27,385</b>	<b>24,821</b>	<b>393,556</b>
<b>NEFCO Region</b>									
Owner-Occupied	32,818	37,809	35,158	24,575	17,379	16,977	15,101	14,317	194,134
Not Owner-Occupied	3,643	4,530	4,408	2,784	1,455	728	739	841	19,128
Not Applicable	377	278	221	254	79	36	20	38	1,303
<b>Total</b>	<b>36,838</b>	<b>42,617</b>	<b>39,787</b>	<b>27,613</b>	<b>18,913</b>	<b>17,741</b>	<b>15,860</b>	<b>15,196</b>	<b>214,565</b>
<b>Eastgate Region</b>									
Owner-Occupied	12,453	14,222	13,521	9,199	6,239	5,561	5,018	5,029	71,242
Not Owner-Occupied	1,245	1,537	1,426	1,014	640	378	337	411	6,988
Not Applicable	239	210	169	173	27	19	14	9	860
<b>Total</b>	<b>13,937</b>	<b>15,969</b>	<b>15,116</b>	<b>10,386</b>	<b>6,906</b>	<b>5,958</b>	<b>5,369</b>	<b>5,449</b>	<b>79,090</b>
<b>NEOSCC Region</b>									
Owner-Occupied	106,517	121,064	112,965	77,376	54,598	52,613	46,243	42,767	614,143
Not Owner-Occupied	12,603	16,655	17,533	10,429	4,942	2,516	2,266	2,617	69,561
Not Applicable	1,119	771	580	602	163	85	105	82	3,507
<b>Total</b>	<b>120,239</b>	<b>138,490</b>	<b>131,078</b>	<b>88,407</b>	<b>59,703</b>	<b>55,214</b>	<b>48,614</b>	<b>45,466</b>	<b>687,211</b>

## Denial Rates

After the owner-occupied home purchase loan application is submitted, the applicant receives one of the following status designations:

- “Originated,” which indicates that the loan was made by the lending institution;
- “Approved but not accepted,” which notes loans approved but not accepted by the lender for other reasons;<sup>29</sup>
- “Application denied by financial institution,” which defines a situation wherein the loan application failed;
- “Application withdrawn by applicant,” which means that the applicant closed the application process;
- “File closed for incompleteness” which indicates the loan application process was closed by the institution due to incomplete information; or
- “Loan purchased by the institution,” which means that the previously originated loan was purchased on the secondary market.

These outcomes were used to determine denial rates presented in the following section. Factors in denial of home purchase loans, such as credit scores or down payment amounts, are not reported, but general reasons codes are reported, and are considered in the following narrative.

<sup>29</sup> An applicant’s failure to meet any of the customary loan commitment or closing conditions, such as clear-title requirements, acceptable property survey, acceptable title insurance binder, or clear termite inspection, causes the application to be coded “approved but not accepted.” (FFIEC 2013) Frequently Asked Questions, <http://www.ffiec.gov/hmda/faqreg.htm>



Only loan originations and loan denials were inspected as an indicator of the underlying success or failure of home purchase loan applications. Altogether, there were 328,557 loan originations and 65,149 applications denied for an average eight-year denial rate of 16.5 percent, as shown in Table IV.3. Owner-occupied home purchase denial rates were highest in 2006, at 20.0 percent.

**Table IV.3**  
**Loan Applications by Action Taken**

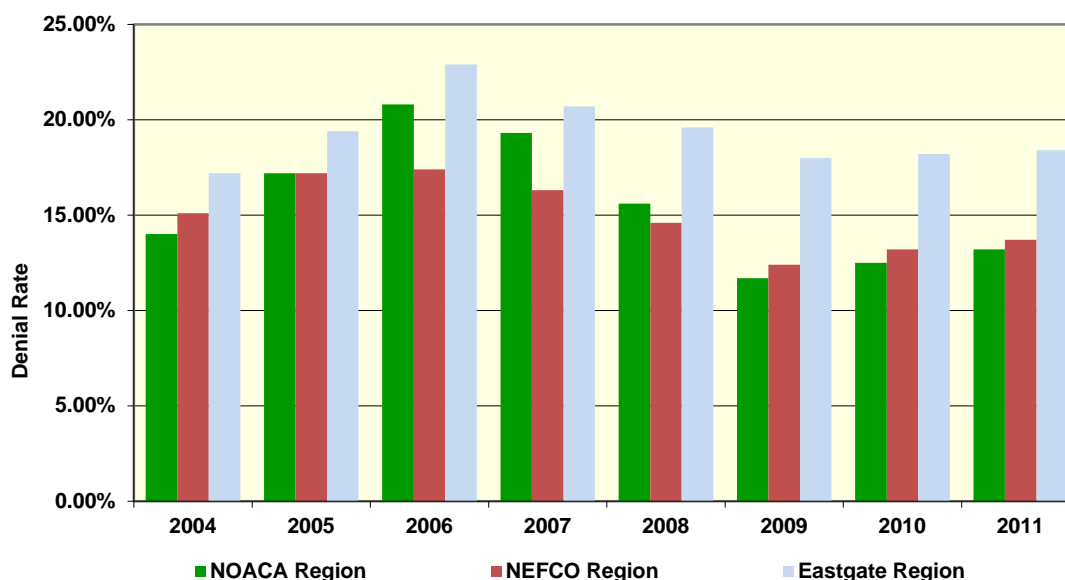
NEOSCC Region  
2004–2011 HMDA Data

Action	2004	2005	2006	2007	2008	2009	2010	2011	Total
Loan Originated	60,928	66,203	58,254	41,498	29,711	26,640	23,847	21,476	328,557
Application Approved but not Accepted	7,146	7,524	6,833	4,102	2,177	1,324	1,302	1,118	31,526
Application Denied	10,515	14,010	14,555	9,437	5,568	3,867	3,690	3,507	65,149
Application Withdrawn by Applicant	6,769	8,744	7,153	3,573	2,797	2,347	2,225	2,141	35,749
File Closed for Incompleteness	1,866	1,947	1,712	1,262	650	497	500	381	8,815
Loan Purchased by the Institution	19,293	22,476	24,404	17,437	13,662	17,929	14,678	14,144	144,023
Preapproval Request Denied	0	158	54	67	33	8	1	0	321
Preapproval Approved but not Accepted	0	2	0	0	0	1	0	0	3
<b>Total</b>	<b>106,517</b>	<b>121,064</b>	<b>112,965</b>	<b>77,376</b>	<b>54,598</b>	<b>52,613</b>	<b>46,243</b>	<b>42,767</b>	<b>614,143</b>
<b>Denial Rate</b>	<b>14.7%</b>	<b>17.5%</b>	<b>20.0%</b>	<b>18.5%</b>	<b>15.8%</b>	<b>12.7%</b>	<b>13.4%</b>	<b>14.0%</b>	<b>16.5%</b>

Denial rates varied widely by year, and by region, as shown in Diagram IV.1. Eastgate tended to have lower denial rates than the other two areas, though the denial rate for the NOACA Region decreased dramatically, from over 20 percent in 2006 to around 13 percent in 2011.

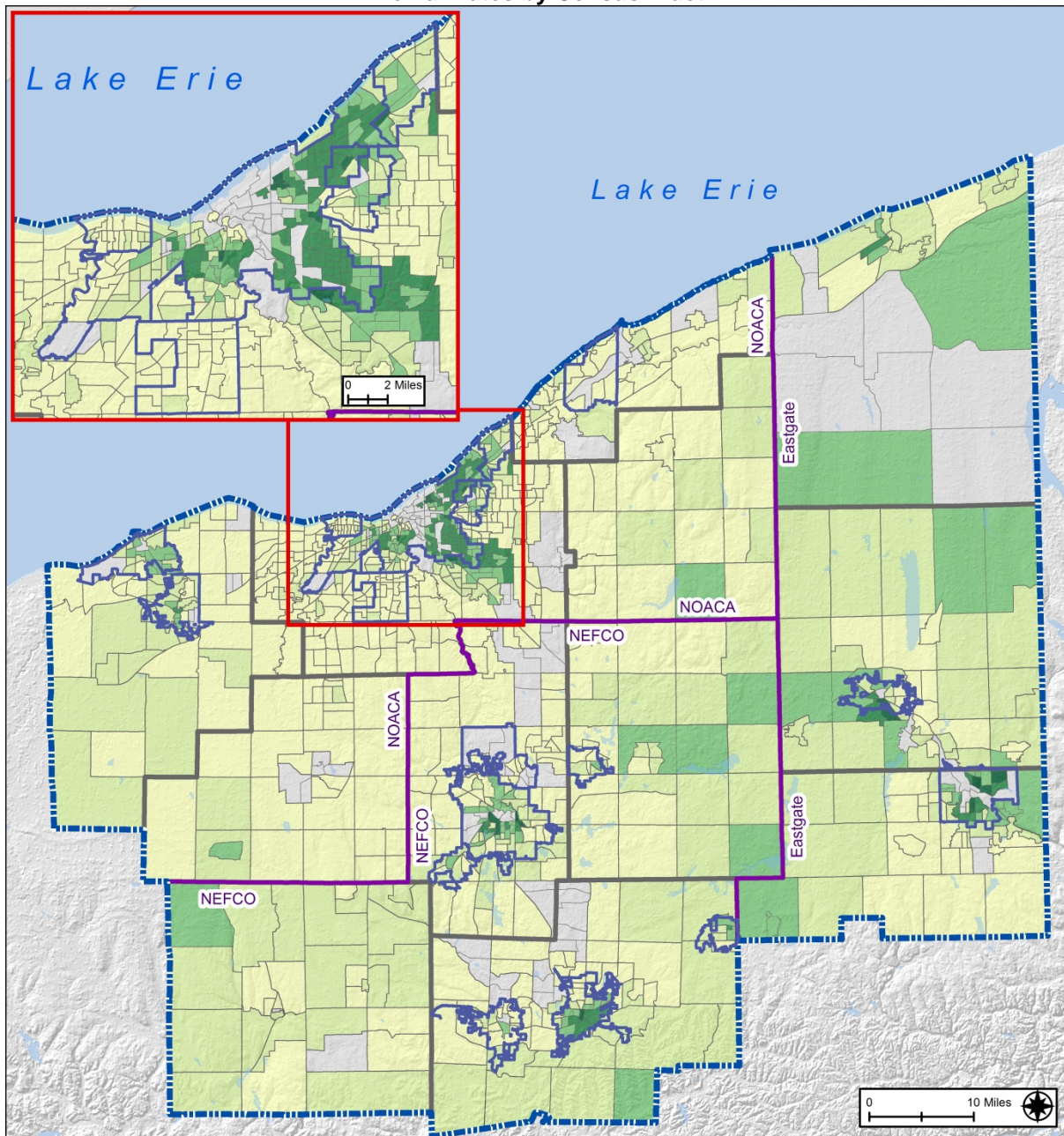
**Diagram IV.1**  
**Denial Rates by Year**

NEOSCC Region  
2004–2011 HMDA Data



Map IV.1 shows the variation in denial rates by area and Census tract. Several tracts had average denial rates above the disproportionate share threshold of 26.5 percent. Rates as high as 70.6 percent were seen; many of these were in tracts in and around Cleveland, Akron, and other of the more urbanized areas of the NEOSCC Region.

**Map IV.1**  
**Denial Rates by Census Tract**



### LEGEND

#### 2004–2011 Denial Rate Distribution

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

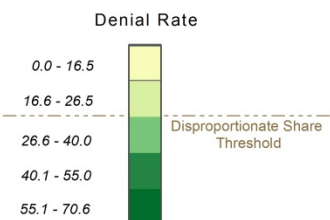
Disproportionate Share Threshold = 26.5% (A disproportionate share exists when the share of a population in a given area is at least 10 percentage points greater than the study area average.)

- Census Tract Boundaries
- Entitlement City Boundaries
- MPO/COG Boundaries

- No Loans Originated or Denied
- NEOSCC Boundary

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

Data Source: FFIEC HMDA, 2004–2011



HMDA data were also used to determine denial rates by gender. Table IV.4 shows that denial rates were not balanced, with females experiencing much higher denial rates than males for the most part. Between 2004 and 2011, on average, male applicants experienced a denial rate of 14.5 percent, while female applicants experienced a denial rate of 18.9 percent. The difference between denial rates for males and females hovered around 5 to 6 percent in several years, but began to converge after 2009, with a 1.8 percentage point difference in 2011.

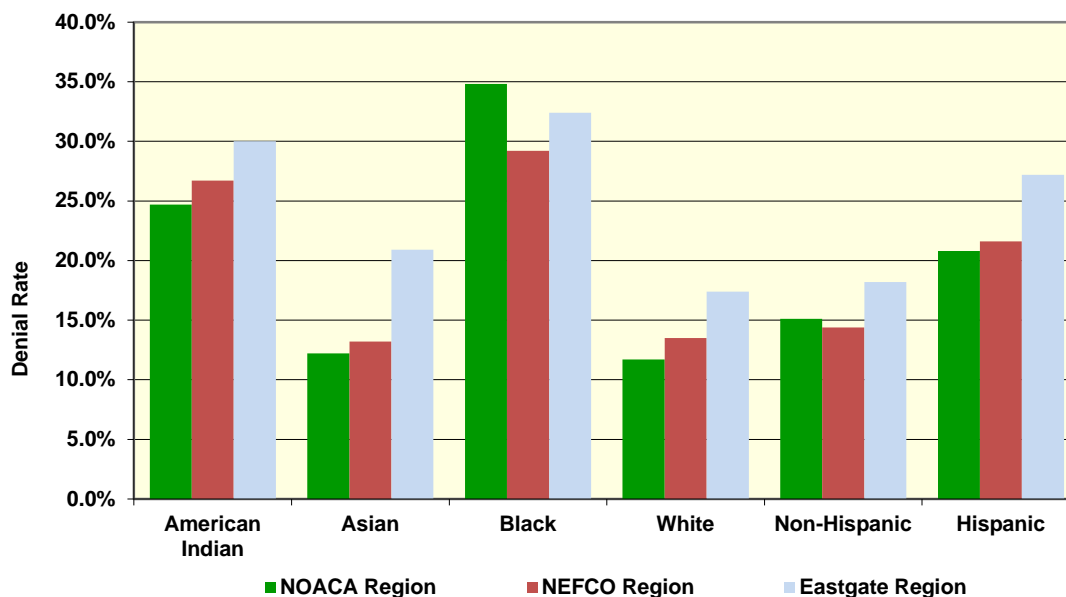
**Table IV.4**  
**Denial Rates by Gender of Applicant**  
 NEOSCC Region  
 2004–2011 HMDA Data

Year	Male	Female	Not Available	Not Applicable	Average
2004	12.6%	16.4%	43.5%	10.5%	14.7%
2005	15.1%	20.3%	35.4%	18.2%	17.5%
2006	17.2%	23.7%	33.9%	6.3%	20.0%
2007	15.9%	22.1%	34.5%	20.0%	18.5%
2008	14.5%	17.1%	25.9%	25.0%	15.8%
2009	12.0%	13.1%	22.3%	.0%	12.7%
2010	12.3%	14.8%	19.7%	25.0%	13.4%
2011	13.0%	14.8%	22.7%	28.6%	14.0%
<b>Average</b>	<b>14.5%</b>	<b>18.9%</b>	<b>31.9%</b>	<b>16.8%</b>	<b>16.5%</b>

Denial rates were also calculated by race and ethnicity of loan applicants. Diagram IV.2 presents denial rates for the racial groups of American Indian, Asian, black, and white and the ethnic categories of Hispanic and non-Hispanic. As shown, applicants of minority race and ethnicity status experienced higher denial rates than white applicants in all three regions. Black applicants had the highest denial rates among all categories, at 33.6 percent and NOACA had the highest black denial rate, close to 35 percent.

Similarly, denial rates for Hispanic persons tended to be considerably higher than those for non-Hispanic persons, with the Eastgate Region experiencing nearly a 10-percentage point difference between rates for Hispanic and non-Hispanic persons.

**Diagram IV.2**  
**Denial Rates by Race and Ethnicity of Applicant**  
 NEOSCC Region  
 2004–2011 HMDA Data

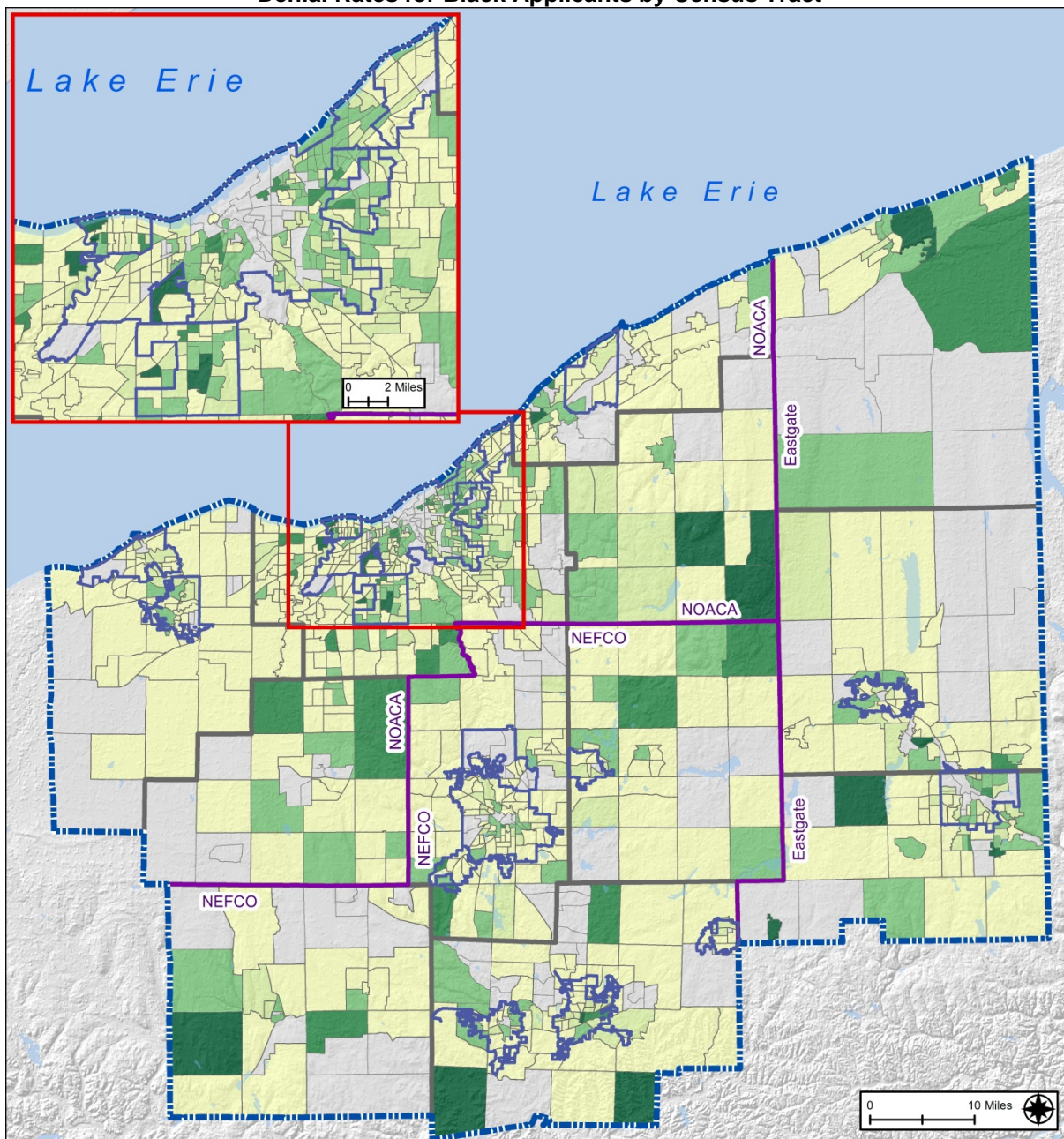


Data regarding the concentration of denial rates for black applicants in the NEOSCC Region are presented in Map IV.2. As shown, while several areas of Cleveland and other large cities saw high average denial rates for black applicants, reaching 100 percent, in many city and suburban tracts the rates were low. A few of the more rural areas saw high denial rates, but this may be due to only one or two applicants being denied. It is more concerning that many of the 60 to 80 percent denial rates still tended to congregate in areas with the highest concentration of black persons.

Map IV.3 shows denial rates for Hispanic applicants in the NEOSCC Region; these rates were even more heavily weighted to rural tracts, with many in the Eastgate and NEFCO regions having rates as high as 100 percent. Within the cities, high denial rates for Hispanic applicants ranged from the lowest to highest averages seen, suggesting large differences between neighborhoods.



**Map IV.2**  
**Denial Rates for Black Applicants by Census Tract**



### 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.)

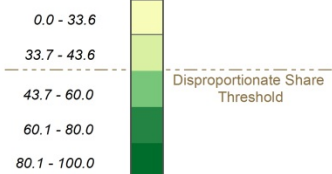
- Census Tract Boundaries
- Entitlement City Boundaries
- MPO/COG Boundaries

Data Source: FFIEC HMDA, 2004–2011

- No Loans to Black Applicants Originated or Denied
- NEOSCC Boundary

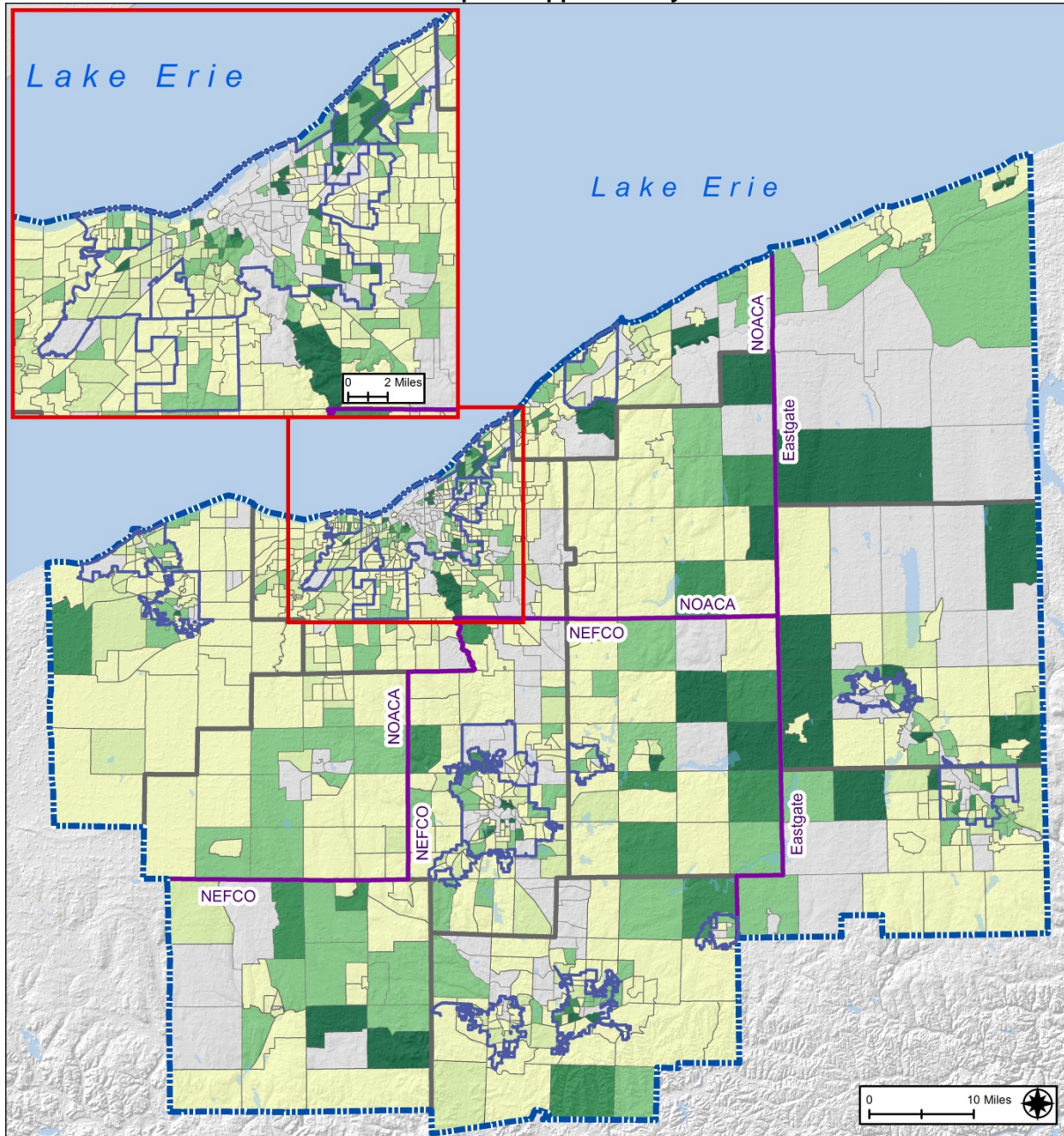
NOTE: The Counties of Cuyahoga, Lake, Stark, and Summit are also entitlement areas.

#### Denial Rate for Black Applicants





**Map IV.3**  
**Denial Rates for Hispanic Applicants by Census Tract**



#### 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
- MPO/COG Boundaries

- No Loans to Hispanic Applicants Originated or Denied
- 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

- 0.0 - 21.6
- 21.7 - 31.6
- 31.7 - 50.0
- 50.1 - 75.0
- 75.1 - 100.0



The HMDA database includes information regarding the reason for a loan denial, although financial institutions are not uniformly required to fill out this field. Nevertheless, the most frequently cited categories of denials were credit history and debt-to-income ratio, as shown in Table IV.5. These problems were most prevalent from 2004 through 2007, however, the entire rate of denial declined and the share of denial attributable to credit history and debt-to-income actually rose from 34.0 percent to 42.3 percent.

**Table IV.5**  
**Loan Applications by Reason for Denial**

NEOSCC Region  
2004–2011 HMDA Data

Denial Reason	2004	2005	2006	2007	2008	2009	2010	2011	Total
Credit History	2,256	2,664	2,589	2,046	1,241	907	919	781	13,403
Debt-to-Income Ratio	1,320	1,625	1,600	1,441	977	799	834	704	9,300
Collateral	803	1,106	1,257	994	949	753	693	631	7,186
Credit Application Incomplete	889	1,052	900	961	462	294	293	453	5,304
Unverifiable Information	271	469	567	501	239	121	109	105	2,382
Insufficient Cash	208	231	245	188	119	89	108	88	1,276
Employment History	136	174	202	161	113	95	116	106	1,103
Mortgage Insurance Denied	3	6	14	7	28	28	23	11	120
Other	2,081	3,595	2,578	1,147	470	293	291	237	10,692
Missing	2,548	3,088	4,603	1,991	970	488	304	391	14,383
<b>Total</b>	<b>10,515</b>	<b>14,010</b>	<b>14,555</b>	<b>9,437</b>	<b>5,568</b>	<b>3,867</b>	<b>3,690</b>	<b>3,507</b>	<b>65,149</b>

Table IV.6 shows denial rates by income in the NEOSCC Region. As expected, households with lower incomes were more commonly denied. Households with incomes from \$15,001 to \$30,000 were denied an average of 27.2 percent of the time, while those with incomes above \$75,000 were denied 9.9 percent of the time on average.

**Table IV.6**  
**Denial Rates by Income of Applicant**

NEOSCC Region  
2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	47.5%	54.1%	47.0%	52.2%	51.5%	50.6%	50.3%	57.3%	50.7%
\$15,001–\$30,000	24.7%	29.7%	33.3%	30.8%	26.4%	19.0%	21.7%	21.4%	27.2%
\$30,001–\$45,000	16.8%	19.5%	23.4%	21.8%	18.1%	12.9%	15.0%	15.8%	18.8%
\$45,001–\$60,000	13.6%	16.5%	20.1%	17.6%	15.6%	11.5%	11.7%	12.9%	15.8%
\$60,001–\$75,000	10.2%	13.4%	15.9%	15.3%	12.0%	10.5%	10.6%	12.2%	12.9%
Above \$75,000	7.8%	10.1%	12.0%	11.3%	9.7%	8.5%	8.3%	9.3%	9.9%
Data Missing	20.9%	21.9%	17.3%	23.5%	20.4%	25.1%	33.6%	28.5%	21.3%
<b>Total</b>	<b>14.7%</b>	<b>17.5%</b>	<b>20.0%</b>	<b>18.5%</b>	<b>15.8%</b>	<b>12.7%</b>	<b>13.4%</b>	<b>14.0%</b>	<b>16.5%</b>

Table IV.7 presents denial rates segmented by race or ethnicity and income. Minority racial and ethnic applicants often faced much higher loan denial rates than white applicants, even after correcting for income. For example, black applicants in the NEOSCC Region experienced higher loan denial rates than white applicants across all income levels; at incomes of \$15,000 to \$30,000, black applicants experienced a denial rate of 32.9 percent compared to the white denial rate of 14.8 percent for that income group. At incomes over \$75,000, black applicants had a denial rate of 29.6 percent compared to 7.9 percent for white applicants. Even more dramatic is the average denial rate for black persons having incomes above \$75,000 in the NOACA Region (31.9 percent), compared to a white denial rate of 7.6 percent. This represents

the greatest degree of disparity in black denial rates, as the NEFCO Region had rates of 24.2 and 8.1, and Eastgate 26.8 versus 10.2 for black and white persons, respectively.

**Table IV.7**  
**Denial Rates by Race and Ethnicity and Income of Applicant**

NEOSCC Region  
2004–2011 HMDA Data

Race	<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	Above \$75K	Data Missing	Average
<b>NOACA Region</b>								
American Indian	20.0%	43.0%	23.8%	20.7%	21.5%	19.0%	27.8%	24.7%
Asian	54.8%	24.3%	13.2%	13.4%	12.5%	8.7%	12.8%	12.2%
Black	70.3%	40.8%	33.9%	32.7%	29.4%	31.9%	40.8%	34.8%
White	47.3%	20.8%	13.7%	11.8%	10.0%	7.6%	12.9%	11.7%
Not Available	54.1%	46.2%	35.0%	30.1%	25.2%	16.9%	53.0%	29.9%
Not Applicable	0.0%	15.0%	16.7%	28.6%	15.4%	1.6%	37.5%	13.8%
<b>Average</b>	<b>53.0%</b>	<b>28.2%</b>	<b>19.4%</b>	<b>16.4%</b>	<b>13.3%</b>	<b>9.9%</b>	<b>20.2%</b>	<b>16.4%</b>
Hispanic (Ethnicity)	46.2%	27.1%	22.1%	17.7%	18.7%	11.6%	23.6%	20.8%
<b>NEFCO Region</b>								
American Indian	75.0%	50.0%	28.0%	24.5%	25.8%	12.2%	40.0%	26.7%
Asian	58.3%	22.2%	20.6%	15.9%	10.1%	8.2%	12.7%	13.2%
Black	48.6%	36.4%	29.2%	27.4%	25.1%	24.2%	34.6%	29.2%
White	49.1%	22.9%	15.1%	12.0%	10.0%	8.1%	16.2%	13.5%
Not Available	59.2%	49.1%	35.3%	27.4%	23.0%	18.1%	54.1%	31.2%
Not Applicable		28.6%	66.7%	33.3%	0.0%	0.0%	9.1%	14.3%
<b>Average</b>	<b>50.2%</b>	<b>26.0%</b>	<b>17.4%</b>	<b>13.9%</b>	<b>11.6%</b>	<b>9.6%</b>	<b>21.5%</b>	<b>15.6%</b>
Hispanic (Ethnicity)	66.7%	32.4%	23.2%	19.5%	16.7%	14.3%	18.8%	21.6%
<b>Eastgate Region</b>								
American Indian	66.7%	43.5%	40.9%	16.7%	57.1%	7.4%	16.7%	30.0%
Asian	40.0%	35.7%	26.2%	15.5%	12.5%	13.9%	0.0%	20.9%
Black	53.4%	38.1%	28.4%	27.8%	28.6%	26.8%	34.4%	32.4%
White	47.0%	24.5%	17.7%	15.5%	12.9%	10.2%	22.1%	17.4%
Not Available	49.6%	41.0%	36.5%	33.2%	26.4%	19.8%	59.3%	34.3%
Not Applicable	100.0%	50.0%	33.3%	25.0%	100.0%	0.0%	40.0%	36.8%
<b>Average</b>	<b>48.1%</b>	<b>27.0%</b>	<b>19.8%</b>	<b>17.6%</b>	<b>14.7%</b>	<b>11.4%</b>	<b>27.4%</b>	<b>19.6%</b>
Hispanic (Ethnicity)	44.9%	35.8%	25.2%	22.1%	10.3%	14.3%	30.4%	27.2%
<b>NEOSCC Region</b>								
American Indian	50.0%	45.0%	27.0%	21.4%	24.8%	15.9%	27.6%	25.8%
Asian	54.2%	24.7%	16.0%	14.2%	11.8%	8.7%	12.3%	12.9%
Black	62.3%	39.7%	32.9%	31.6%	28.5%	29.6%	39.3%	33.6%
White	47.9%	22.4%	14.8%	12.4%	10.3%	7.9%	14.7%	13.0%
Not Available	54.1%	46.1%	35.3%	29.9%	24.7%	17.5%	54.0%	30.9%
Not Applicable	50.0%	20.7%	23.3%	29.0%	18.8%	1.1%	28.1%	15.9%
<b>Average</b>	<b>50.7%</b>	<b>27.2%</b>	<b>18.8%</b>	<b>15.8%</b>	<b>12.9%</b>	<b>9.9%</b>	<b>21.3%</b>	<b>16.5%</b>
Hispanic (Ethnicity)	48.1%	29.0%	22.5%	18.4%	17.5%	12.4%	23.6%	21.6%



## Predatory Lending

In addition to modifications implemented in 2004 for documenting loan applicants' race and ethnicity, the HMDA reporting requirements were changed in response to the Predatory Lending Consumer Protection Act of 2002 as well as the Home Owner Equity Protection Act (HOEPA). Consequently, loan originations are now flagged in the data system for three additional attributes:

- If they are HOEPA loans;<sup>30</sup>
- Lien status, such as whether secured by a first lien, a subordinate lien, not secured by a lien, or not applicable (purchased loans); and
- Presence of high annual percentage rate loans (HALs), defined as more than three percentage points higher than comparable treasury rates for home purchase loans, or five percentage points higher for refinance loans.<sup>31</sup>

For the 2013 Regional AI analysis, originated owner-occupied home purchase loans qualifying as HALs were examined for 2004 through 2011. These high annual percentage rate (APR) loans may be construed to be predatory in nature. Table IV.8 shows that between 2004 and 2011, there were 49,901 HALs for owner-occupied homes originated in the NEOSCC Region representing 15.2 percent of the total. The number of HALs was highest in 2005 and 2006 when 16,650 and 14,515 were originated, comprising 25.1 and 24.9 percent of all mortgage loans, but decreased significantly afterward, and by 2011, only 124 HALs were made, or 0.6 percent.

**Table IV.8**  
**Originated Owner-Occupied Loans by HAL Status**  
NEOSCC Region  
2004–2011 HMDA Data

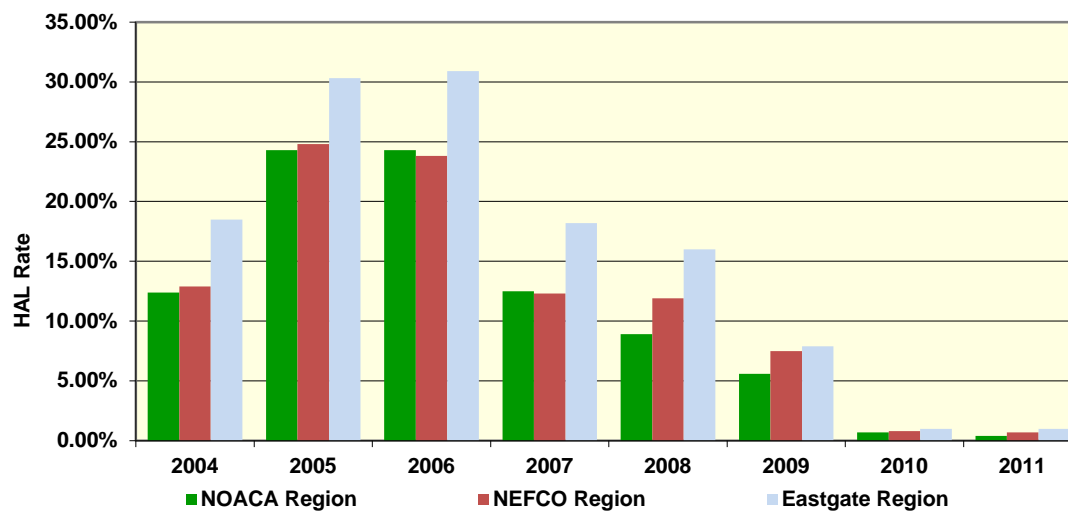
Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Other	52,845	49,553	43,739	36,043	26,538	24,919	23,667	21,352	278,656
HAL	8,083	16,650	14,515	5,455	3,173	1,721	180	124	49,901
<b>Total</b>	<b>60,928</b>	<b>66,203</b>	<b>58,254</b>	<b>41,498</b>	<b>29,711</b>	<b>26,640</b>	<b>23,847</b>	<b>21,476</b>	<b>328,557</b>
Percent HAL	13.3%	25.1%	24.9%	13.1%	10.7%	6.5%	0.8%	0.6%	15.2%

However, the rate at which these types of loans were originated varied substantially between the three metropolitan areas. Interestingly, Eastgate, with the higher level of denial rates, also tended to have a larger portion of its mortgage portfolio based in these more predatory style loans. In fact, Eastgate mortgages originated in 2005 and 2006 were more than 30 percent HALs, as shown in Diagram IV.3.

<sup>30</sup> Loans are subject to the HOEPA if they impose rates or fees above a certain threshold set by the Federal Reserve Board. (FFEIC n.d.)

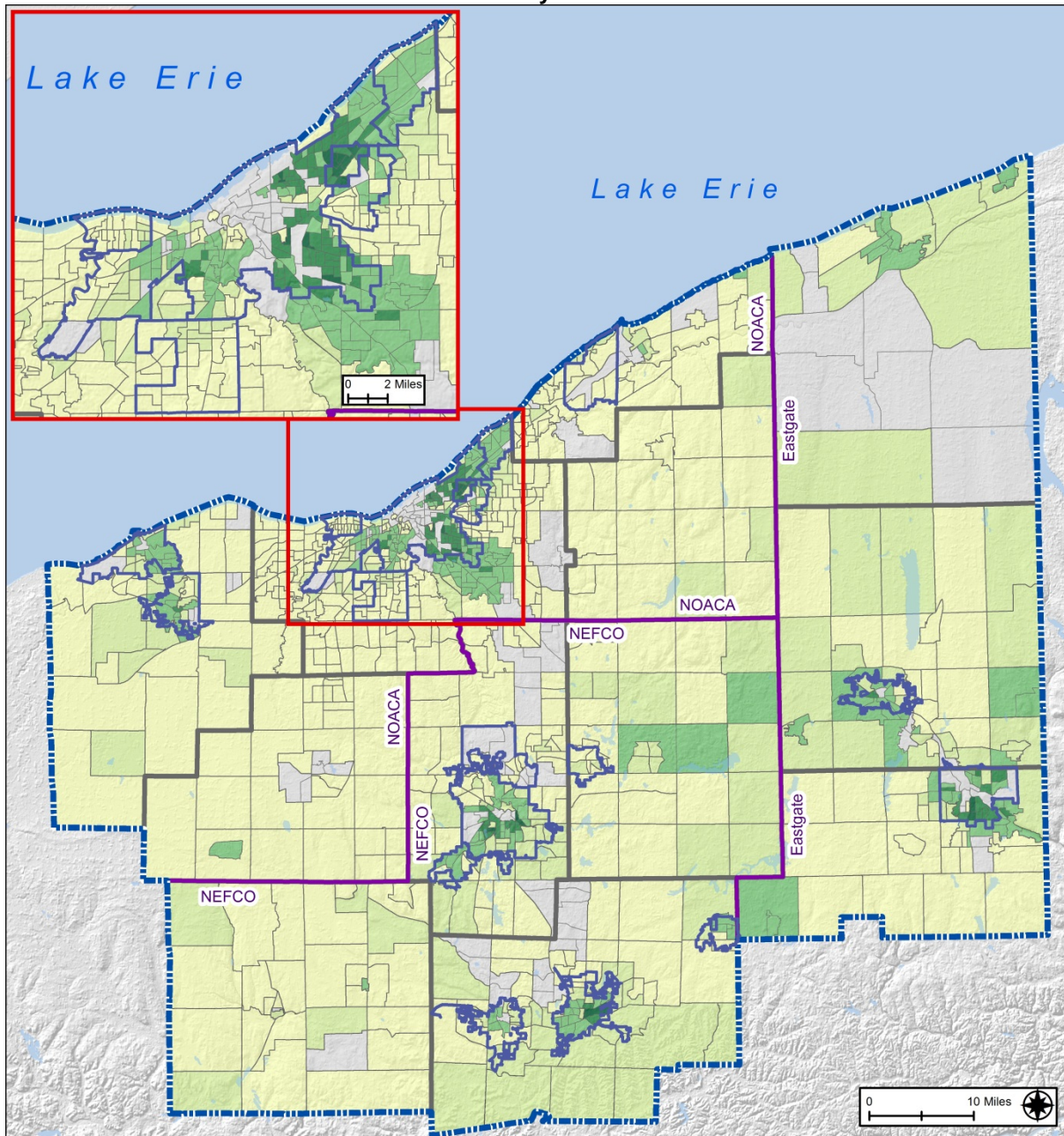
<sup>31</sup> (Board of Governors of the Federal Reserve System 2002)

**Diagram IV.3**  
**HAL Rates by Year**  
 NEOSCC Region  
 2004–2011 HMDA Data



The special distribution of HALs in the NEOSCC Region is presented in Map IV.4. Several tracts in the Region showed average proportions of borrowers who received HALs in excess of the disproportionate share threshold of 25.2 percent; these were particularly the tracts in the largest cities and their suburbs, such as Cleveland and the cities and tracts to its east and southeast, as well as Akron, Canton, and Youngstown.

**Map IV.4**  
**Rate of HALs by Census Tract**



### LEGEND

#### 2004–2011 HAL Rate Distribution

2004–2011 Average HAL Rate in the NEOSCC Region = 15.2%

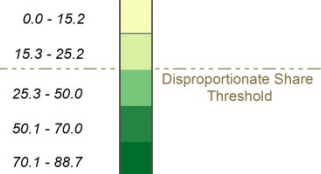
Disproportionate Share Threshold = 25.2% (A disproportionate share exists when the share of a population in a given area is at least 10 percentage points greater than the study area average.)

- Census Tract Boundaries
- Entitlement City Boundaries
- MPO/COG Boundaries
- No Loans Originated
- NEOSCC Boundary

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

Data Source: FFIEC HMDA, 2004–2011

#### HAL Rate



Though the average rate of HALs was 15.2 percent, it varied widely over the period and was most recently very low. While HAL figures improved significantly after 2006, they are a measure of the Region's underlying foreclosure risk for recent homeowners, and it is important to examine characteristics of applicants who received these HALs in the eight-year time period to see if there are lending patterns. As shown in Table IV.9, the group with the greatest number of HALs between 2004 and 2010 was white applicants, with 33,024 such loans. Black applicants took out 10,761 home purchase HALs, and Hispanic applicants received 1,330 HALs over the period. Fortunately, the number of HALs decreased significantly from 2006 to 2010 for all racial and ethnic groups.

**Table IV.9**  
**HALs Originated by Race and Ethnicity of Borrower**

NEOSCC Region  
2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	19	38	39	13	10	4	0	0	123
Asian	65	122	121	50	31	17	1	0	407
Black	1,694	3,595	3,712	1,197	376	172	11	4	10,761
White	5,270	10,400	9,249	3,785	2,577	1,466	161	116	33,024
Not Available	1,021	2,495	1,390	410	179	61	6	4	5,566
Not Applicable	14	0	4	0	0	1	1	0	20
<b>Total</b>	<b>8,083</b>	<b>16,650</b>	<b>14,515</b>	<b>5,455</b>	<b>3,173</b>	<b>1,721</b>	<b>180</b>	<b>124</b>	<b>49,901</b>
Hispanic (Ethnicity)	206	400	409	167	92	51	2	3	1,330

While the highest numbers of HALs were often seen for white applicants, further evaluation of the HMDA data revealed that HALs were issued to black and Hispanic applicants in unusually high proportions, as shown in Table IV.10. On average, 38.2 percent of loans taken by black applicants were HALs, while Hispanic borrowers received HAL loans at a rate of 19.7 percent. White applicants, however, received such loans at an average rate of only 12.1 percent during the period.

**Table IV.10**  
**Rate of HALs Originated by Race and Ethnicity of Borrower**

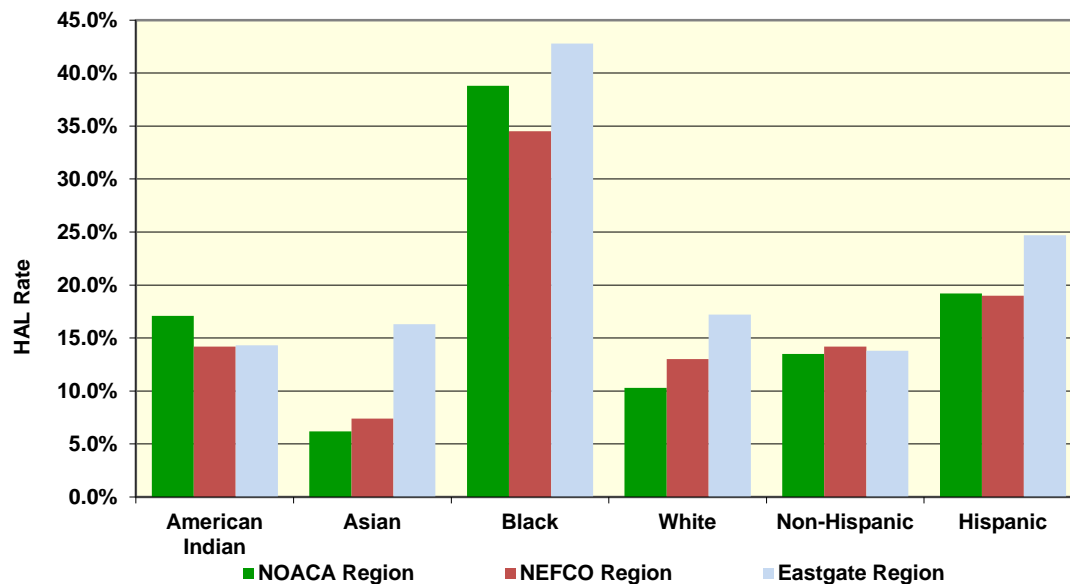
NEOSCC Region  
2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	13.2%	28.1%	29.8%	13.8%	14.5%	4.5%	.0%	.0%	16.0%
Asian	6.0%	11.0%	12.7%	6.6%	5.6%	3.3%	.2%	.0%	6.9%
Black	31.1%	54.3%	59.9%	34.6%	17.0%	10.3%	.8%	.4%	38.2%
White	10.4%	19.4%	19.5%	10.8%	10.2%	6.4%	.8%	.6%	12.1%
Not Available	31.0%	54.1%	40.1%	18.4%	11.0%	4.5%	.4%	.3%	28.4%
Not Applicable	12.2%	.0%	23.5%	.0%	.0%	20.0%	33.3%	.0%	10%
<b>Average</b>	<b>13.3%</b>	<b>25.1%</b>	<b>24.9%</b>	<b>13.1%</b>	<b>10.7%</b>	<b>6.5%</b>	<b>0.8%</b>	<b>0.6%</b>	<b>15.2%</b>
Non-Hispanic Ethnicity	12.5%	22.6%	23.8%	12.8%	10.5%	6.5%	.8%	.6%	14.3%
Hispanic (Ethnicity)	16.5%	30.3%	32.4%	19.3%	15.2%	9.3%	.4%	.7%	19.7%



Diagram IV.4 shows the rates of HALs issued to applicants by race and ethnicity and visually demonstrates that black and Hispanic applicants were issued HALs more frequently over other loans than were other applicants. However, when comparing the three planning regions, we see that Eastgate tended to have the highest rates of HALs for both black and Hispanic persons, exceeding 42 percent and almost 25 percent, respectively.

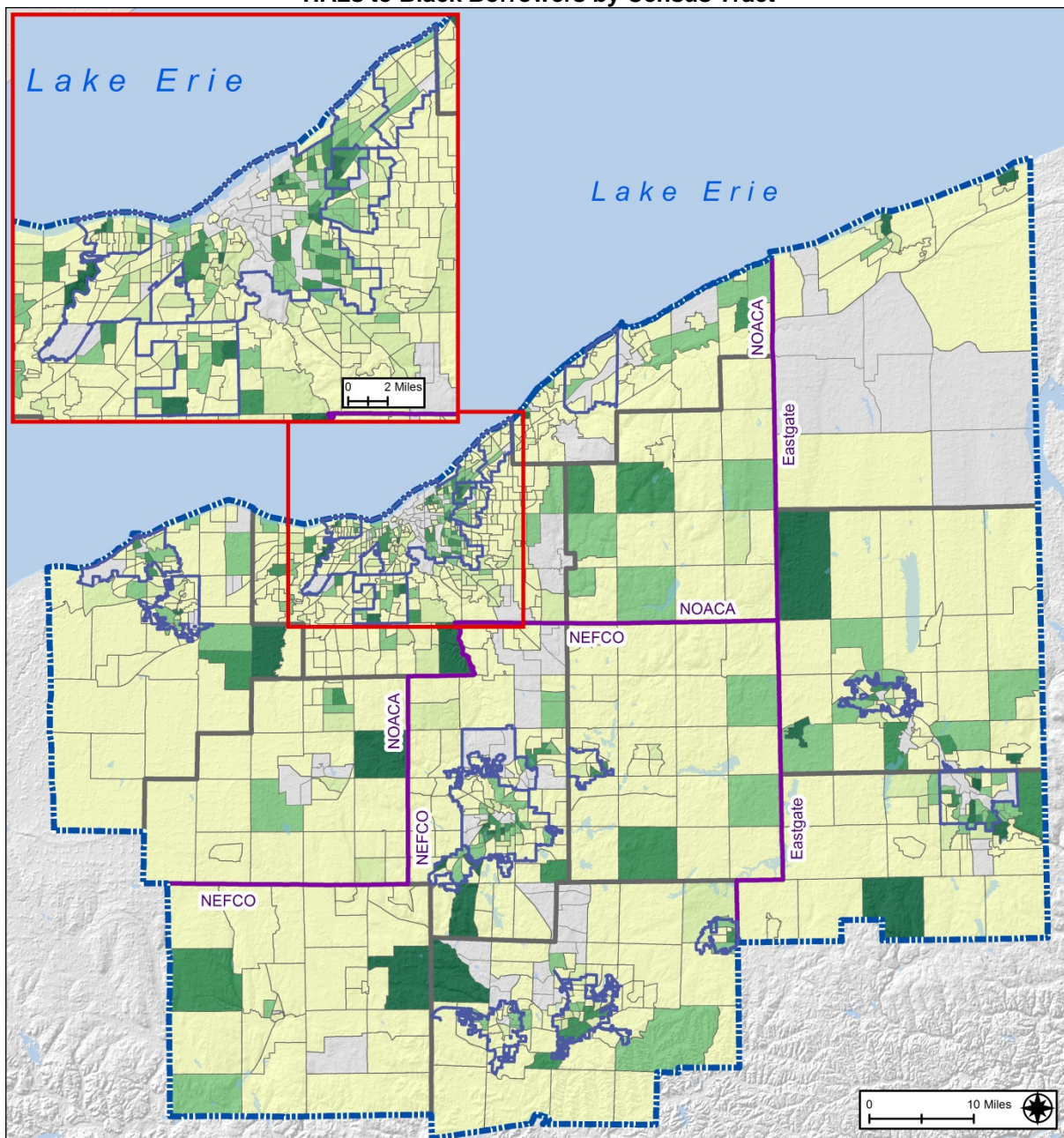
**Diagram IV.4**  
**HAL Rate by Race and Ethnicity**  
 NEOSCC Region  
 2004–2011 HMDA Data



The concentration of HALs for black borrowers is shown in Map IV.5. As shown, high HAL rates above the disproportionate share threshold of 48.2 percent were seen scattered across the Region, particularly in several central urban tracts in the large cities and in several rural tracts.

Map IV.6 shows the rates of HALs to Hispanic borrowers across the Region. These shares were also scattered across cities and counties, but there were more rural tracts with disproportionately high rates than seen in the previous map, and fewer of the darkest shades in the cities.

**Map IV.5**  
**HALs to Black Borrowers by Census Tract**



### LEGEND

#### 2004–2011 Distribution of HAL Rates for Black Borrowers

2004–2011 Average HAL Rate for Black Borrowers in the NEOSCC Region = 38.2%

Disproportionate Share Threshold = 48.2% (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.)

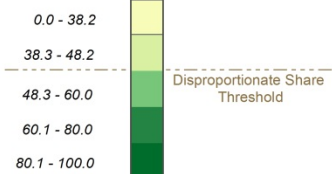
- Census Tract Boundaries
- Entitlement City Boundaries
- MPO/COG Boundaries

Data Source: FFIEC HMDA, 2004–2011

- No Loans for Black Borrowers Originated
- NEOSCC Boundary

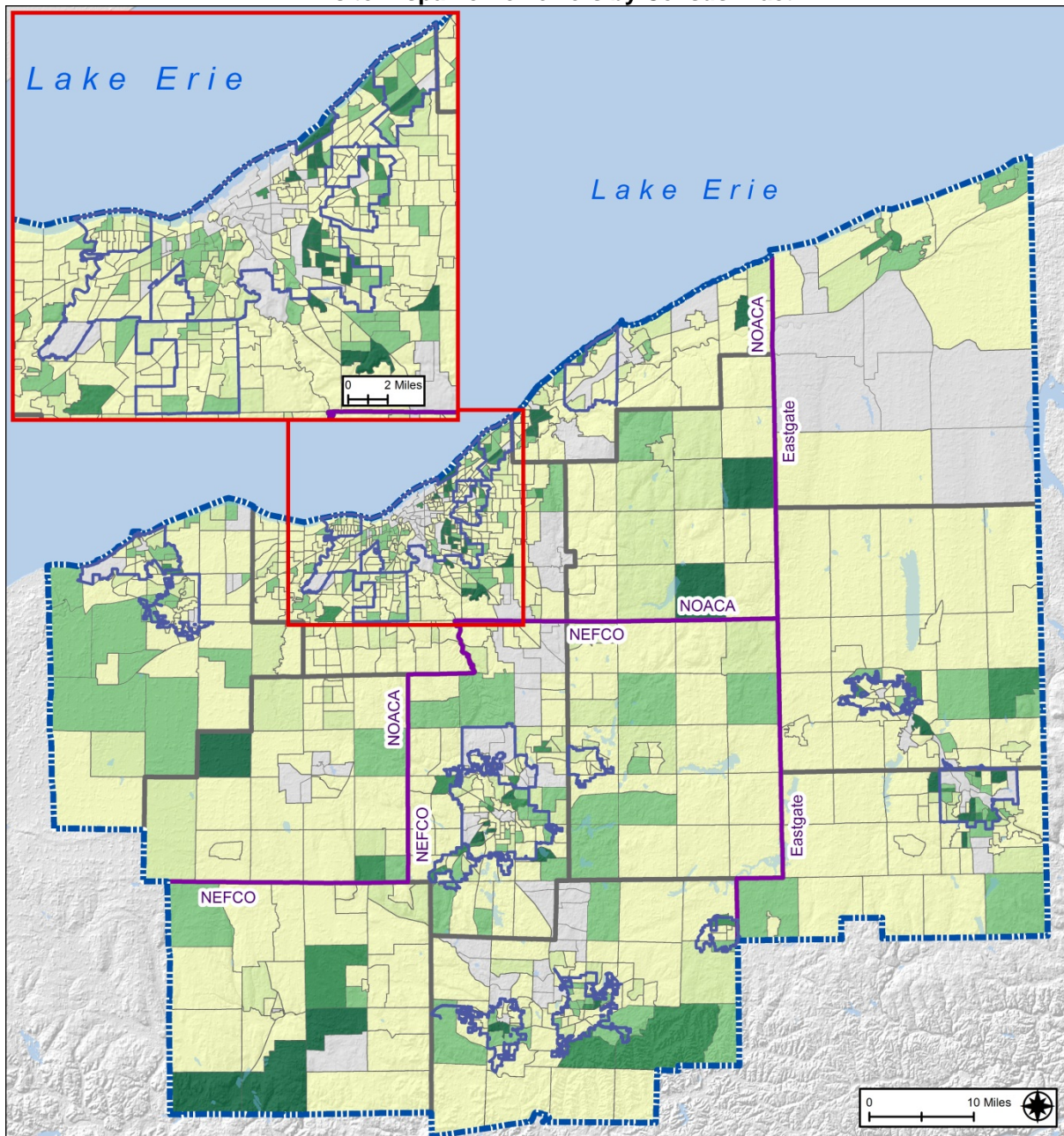
NOTE: The Counties of Cuyahoga, Lake, Stark, and Summit are also entitlement areas.

#### HAL Rate for Black Borrowers





**Map IV.6**  
**HALs to Hispanic Borrowers by Census Tract**



### LEGEND

#### 2004–2011 Distribution of HAL Rates for Hispanic Borrowers

2004–2011 Average HAL Rate for Hispanic Borrowers in the NEOSCC Region = 19.7%

Disproportionate Share Threshold = 29.7% (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.)

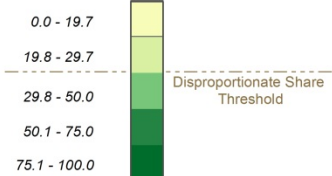
- Census Tract Boundaries
- Entitlement City Boundaries
- MPO/COG Boundaries

- No Loans to Hispanic Borrowers Originated
- NEOSCC Boundary

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

Data Source: FFIEC HMDA, 2004–2011

#### HAL Rate for Hispanic Borrowers

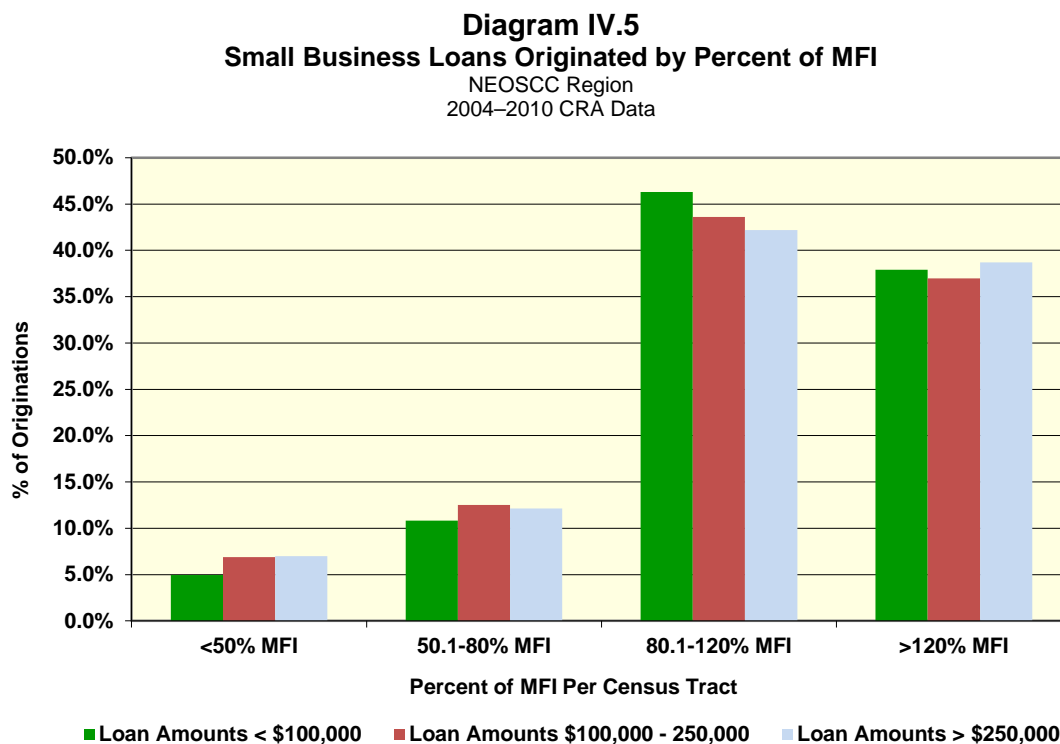


## COMMUNITY REINVESTMENT ACT DATA

Access to home mortgage and improvement loans is important for housing consumers. Still, investment patterns within an area also play a role for influencing housing choices, as viable economic activities contribute to an area's desirability. Measure of such investment can be evaluated through use of Community Reinvestment Act (CRA) data. As noted previously, the CRA was enacted in 1977 and is intended to encourage lending institutions to meet the credit needs of the communities in which they operate, including low- and moderate-income areas. Along with the HMDA data presented previously, the FFIEC also releases data mandated by the CRA.

Examination of CRA data revealed that between 2000 and 2011, 967,379 small business loans were extended to businesses in tracts that make up the NEOSCC Region. Of these, 331,214 loans went to businesses with annual revenues of less than \$1 million. The large majority of all loans, 901,497, were valued under \$100,000. Tables with complete CRA data are presented in the **Volume III**.

Small business loans were also analyzed to determine the location of funding in relation to median family income (MFI) levels. Diagram IV.5 presents the distribution of small business loans by value and by percent of MFI by Census tract. As shown, few loans went to areas with 80 percent or less of the MFI, despite the fact that these loans were designed to aid low- and moderate-income areas. The highest value loans, those for more than \$250,000, were also mostly distributed in tracts with 80.1 percent of MFI and above.





These data were also segmented into the three planning regions, to determine if there were disparities within the overall NEOSCC Region. These data are presented in Table IV.11. As shown, Eastgate tended to have the smallest share of the loans of any size in its lower-income areas. Conversely, the NOACA tended to have the highest concentration of loans of any size in its higher income areas.

**Table IV.11**  
**Percent of Small Business Loan Originations by**  
**Census Tract MFI**  
 NEOSCC Region  
 2004–2010 CRA Data

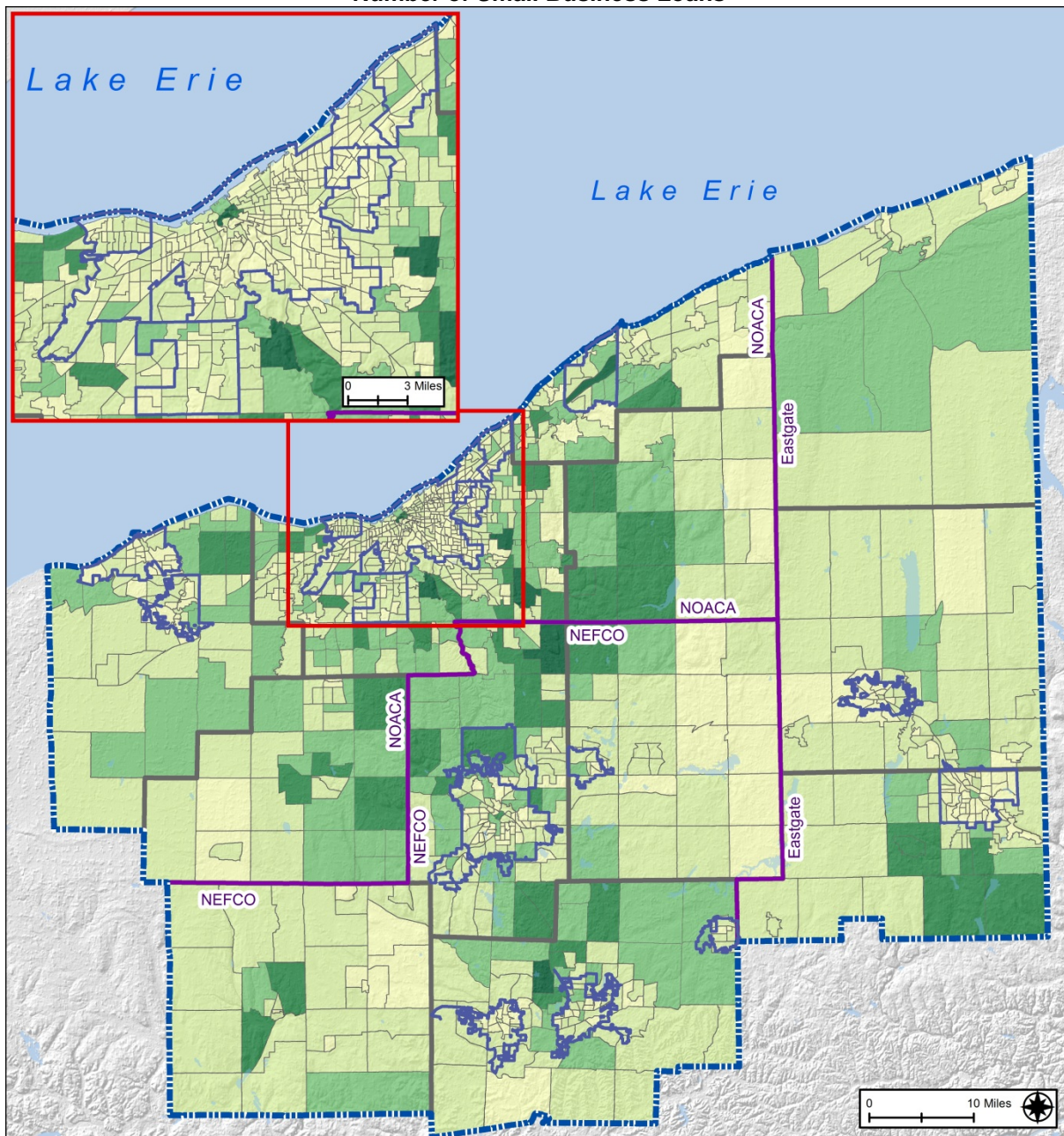
Census Tract MFI	Loan Amount		
	< 100,000	100,000 - 250,000	>250,000
<b>NOACA Region</b>			
<50% MFI	5.3%	7.0%	6.9%
50.1-80% MFI	10.8%	12.5%	12.5%
80.1-120% MFI	41.3%	39.4%	39.3%
>120% MFI	42.6%	41.1%	41.3%
<b>NEFCO Region</b>			
<50% MFI	5.0%	7.9%	8.2%
50.1-80% MFI	10.3%	11.9%	10.9%
80.1-120% MFI	52.1%	48.7%	45.9%
>120% MFI	32.6%	31.5%	35.0%
<b>Eastgate Region</b>			
<50% MFI	3.5%	4.5%	4.5%
50.1-80% MFI	12.1%	13.8%	13.3%
80.1-120% MFI	55.1%	48.3%	46.1%
>120% MFI	29.3%	33.3%	36.1%
<b>NEOSCC Region</b>			
<50% MFI	5.0%	6.9%	7.0%
50.1-80% MFI	10.8%	12.5%	12.1%
80.1-120% MFI	46.3%	43.6%	42.2%
>120% MFI	37.9%	37.0%	38.7%

Maps presenting the spatial distribution of the number of loans, as well as the volume of the lending activities, all by Census tract appear in Maps IV.7 and IV.8,. As shown therein, the urbanized areas tended to lag behind other areas of the NEOSCC Region in terms of the number and volume of loans. Hence areas that currently are defined as lacking in opportunity also are being eclipsed by investments flowing to higher opportunity areas.

Map IV.7 shows the frequency of small business loans by tract in the Region. For the most part, these loans were more commonly distributed in the suburban and rural tracts south and southeast of Cleveland, although they were also common in southern Mahoning County and north of Canton. Very few urban tracts received the highest loan values per tract in the Region.

Map IV.8 shows the cumulative average values of small business loans for each tract in the region; while many of the same tracts received significant lending attention, some of the rural tracts that received the most loans received the least funding in dollars. This suggests that many loans in small towns and less-populated tracts tended to be of lower value than the loans given in smaller, more urban tracts.

**Map IV.7**  
**Number of Small Business Loans**



### LEGEND

#### Number of Small Business Loans Invested from 2000–2011

- Census Tract Boundaries
- Entitlement City Boundaries
- MPO/COG Boundaries

- NEOSCC Boundary

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

Data Source: FFEIC 2000–2011 CRA

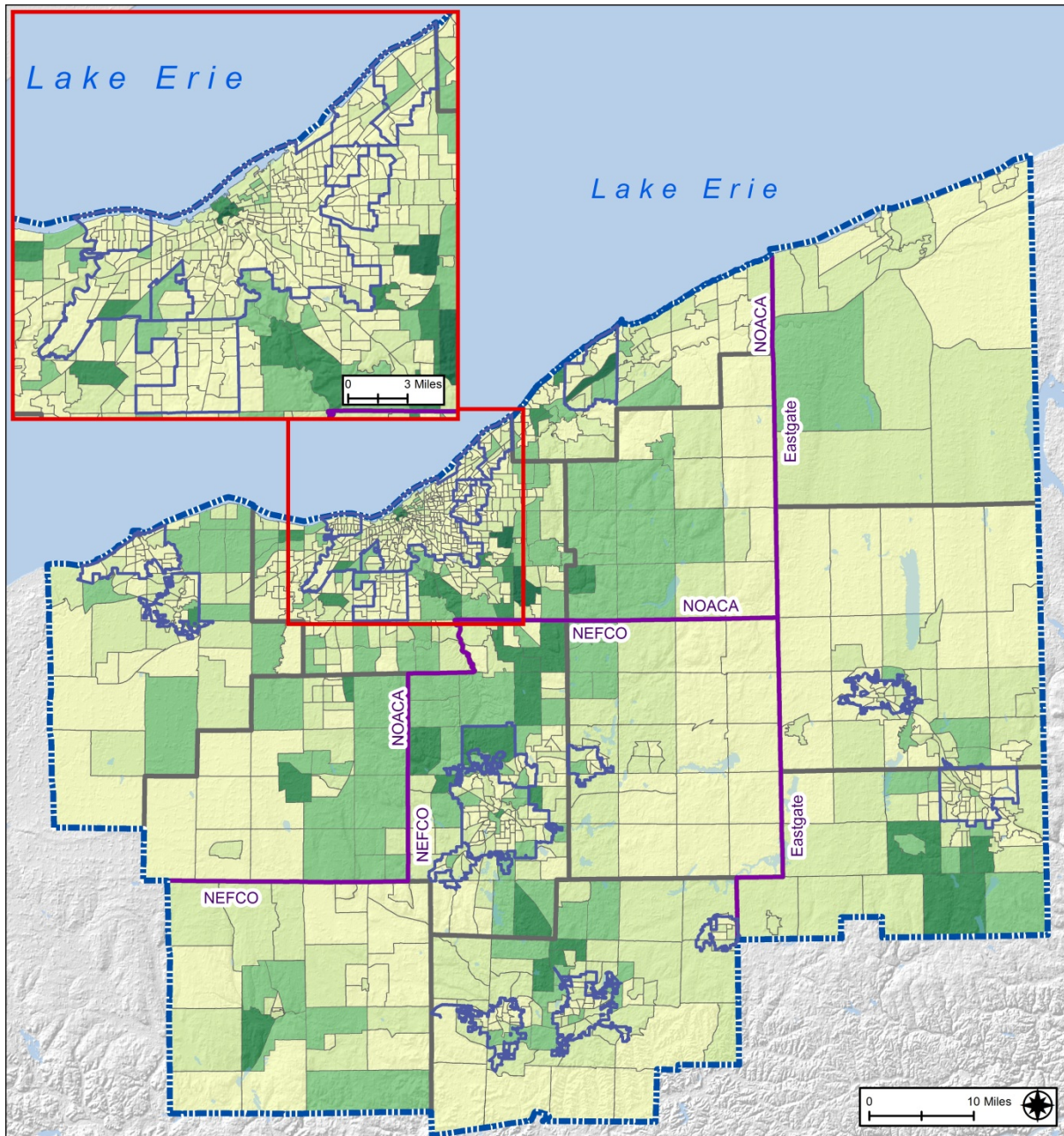
#### Total Number of Small Business Loans

- 11 - 500
- 501 - 1,250
- 1,251 - 2,250
- 2,251 - 4,500
- 4,501 - 8,086





**Map IV.8**  
**Amount of Small Business Loan Dollars**



### LEGEND

#### Amount of Small Business Loan Dollars Invested from 2000–2011

- Census Tract Boundaries
- Entitlement City Boundaries
- MPO/COG Boundaries

- NEOSCC Boundary

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

Data Source: FFEIC 2000–2011 CRA

#### Total Value of Small Business Loans (in \$1,000s)

- \$53 - 20,000
- 20,001 - 50,000
- 50,001 - 125,000
- 125,001 - 275,000
- 275,001 - 558,083



## B. FAIR HOUSING COMPLAINTS

Housing discrimination complaint data were requested from nine agencies that process complaints in the NEOSCC Region: HUD, Ohio Civil Rights Commission (OCRC), City of Canton Fair Housing, City of North Olmsted Law and Fair Housing, Fair Housing Contact Service (FHCS), The Housing Center, Fair Housing Resource Center, Inc. (FHRC), Fair Housing Review Board, and Cleveland Fair Housing Board.

These requests were made via a formal process as required in the Freedom of Information Act (FOIA) on September 10, 2012. However, only four agencies provided complaint data that could be tabulated. Data provided by these agencies are displayed in the following section, separated by agency: HUD, the OCRC, the FHCS, and the FHRC.

### U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

HUD maintains records of housing complaints that represent alleged violations of federal housing law, as described previously in **Section III**. Over the January 2004 through September 2012 period, HUD reported 2,297 complaints filed in the Region, as shown in Table IV.12. The total number of complaints ranged from a low of 205 in 2007 to a high of 347 in 2009, excluding 2012 as a partial year. Table IV.12 also presents complaint data by basis, or the protected class status of the person allegedly aggrieved in the complaint. Complainants may cite more than one basis, so the number of bases cited can exceed the total number of complaints. As shown, 2,698 bases were cited in relation to the 2,297 complaints filed. Disability was the most commonly cited basis, with 902 complaints with this basis, followed by race, with 743. Complaint activity, however, was not uniformly distributed throughout the Region. The NOACA region had 1,174 complaints, the NEFCO region 981, and Eastgate 142.

**Table IV.12**  
**Fair Housing Complaints by Basis**  
NEOSCC Region  
2004–2012 HUD Data

<b>Basis</b>	<b>NOACA Region</b>	<b>NEFCO Region</b>	<b>Eastgate Region</b>	<b>NEOSCC Region</b>
Color	12	29	6	47
Disability	376	452	74	902
Family Status	330	229	24	583
National Origin	112	28	3	143
Race	397	296	50	743
Religion	33	13	6	52
Sex	111	110	7	228
<b>Total Bases</b>	<b>1,371</b>	<b>1,157</b>	<b>170</b>	<b>2,698</b>
<b>Total Complaints</b>	<b>1,174</b>	<b>981</b>	<b>142</b>	<b>2,297</b>

HUD records the issue, or alleged discriminatory action related to each complaint. These are presented in Table IV.13. In the same way that bases are reported, more than one issue may be associated with each complaint, and 3,021 issues were cited. Discrimination in terms, conditions, or privileges relating to rental was cited 505 times; discriminatory refusal to rent was cited 409 times; failure to make reasonable accommodation was cited 391 times; and discriminatory terms, conditions, privileges, or services and facilities was cited 354 times. The



most commonly cited issues in this complaint dataset related predominantly to rental transactions, suggesting that alleged discrimination was more common in the rental market.

**Table IV.13**  
**Fair Housing Complaints by Issue**  
NEOSCC Region  
2004–2012 HUD Data

Issue	NOACA Region	NEFCO Region	Eastgate Region	NEOSCC Region
Discrimination in terms, conditions or privileges relating to rental	248	220	220	505
Discriminatory refusal to rent	246	142	142	409
Failure to make reasonable accommodation	169	189	189	391
Discriminatory terms, conditions, privileges, or services and facilities	161	170	170	354
Discriminatory advertisement - rental	162	74	74	243
Discriminatory advertising, statements and notices	140	42	42	198
Discriminatory acts under Section 818 (coercion, etc.)	90	59	59	157
Discriminatory refusal to rent and negotiate for rental	55	74	74	138
Other discriminatory acts	32	75	75	111
Otherwise deny or make housing available	26	22	22	57
Discrimination in services and facilities relating to rental	20	23	23	50
Non-compliance with design and construction requirements (handicap)	15	32	32	48
False denial or representation of availability - rental	20	17	17	41
Discriminatory refusal to negotiate for rental	14	23	23	38
Discriminatory financing (includes real estate transactions)	17	8	8	28
Discrimination in making of loans	11	11	11	22
Using ordinances to discriminate in zoning and land use	19	1	1	22
Discriminatory refusal to sell	10	8	8	21
Discrimination in terms, conditions, privileges relating to sale	12	8	8	21
Failure to provide accessible and usable public and common user areas	2	19	19	21
Failure to permit reasonable modification	10	9	9	20
Discrimination in the terms or conditions for making loans	10	7	7	18
False denial or representation of availability	8	1	1	11
Steering	5	4	4	10
Failure to provide an accessible route into and thru the covered unit		10	10	10
Discriminatory refusal to sell and negotiate for sale	5	4	4	9
Failure to provide an accessible building entrance	2	5	5	8
Discriminatory advertising - sale	4	2	2	6
Refusing to provide insurance	4	2	2	6
Restriction of choices relative to a rental	2	4	4	6
Redlining - insurance	4			4
Failure to provide usable doors	2	1	1	4
Discriminatory refusal to negotiate for sale	2			3
Discrimination in the selling of residential real property	2			3
Discrimination in the appraising of residential real property	2	1	1	3
Discrimination in terms and conditions of membership		3	3	3
Discrimination in services and facilities relating to sale	3			3
Refusing to provide municipal services or property	1	2	2	3
False denial or representation of availability - sale		1	1	2
Discrimination in the brokering of residential real property	1	1	1	2
Discriminatory brokerage service	1	1	1	2
Redlining - mortgage	2			2
Adverse action against an employee		2	2	2
Failure to provide usable kitchens and bathrooms		2	2	2
Blockbusting - rental	1			1
Redlining		1	1	1
Restriction of choices relative to a sale		1	1	1
Use of discriminatory indicators	1			1
<b>Total Issues</b>	<b>1,541</b>	<b>1,281</b>	<b>1,281</b>	<b>3,021</b>
<b>Total Complaints</b>	<b>1,174</b>	<b>981</b>	<b>981</b>	<b>2,297</b>

## OHIO CIVIL RIGHTS COMMISSION

The OCRC processes housing discrimination complaints as well. Over the January 2004 through September 2012 period, the OCRC reported 2,089 complaints filed in the Region, as shown in Table IV.14. The total number of complaints ranged from a low of 213 in 2009 to a high of 348 in 2006, excluding 2012 as a partial year.

This table also presents complaint data by basis, or the protected class status of the person allegedly aggrieved in the complaint. Complainants may cite more than one basis, so the number of bases cited can exceed the total number of complaints. As shown, 2,754 bases were cited in relation to the 2,089 complaints filed. Disability was the most commonly cited basis with the OCRC, with 872 bases, followed by race, with 715. The same order was seen in the three planning areas as well. However, retaliation represented a substantially higher portion of bases than elsewhere in the NEFCO region: 13.6 percent of the bases versus 9.9 percent in NOACA and 6.3 percent in Eastgate.

**Table IV.14**  
**Fair Housing Complaints by Basis**  
NEOSCC Region  
2004–2012 OCRC Data

<b>Basis</b>	<b>NOACA Region</b>	<b>NEFCO Region</b>	<b>Eastgate Region</b>	<b>NEOSCC Region</b>
Disability	391	421	60	872
Race	370	291	54	715
Family Status	175	143	14	332
Retaliation	131	172	10	313
Gender	132	117	9	258
National Origin	82	28	2	112
Color	16	64	6	86
Religion	22	17	5	44
Age		1	1	2
Ancestry		2		2
Other	6	12		18
<b>Total Bases</b>	<b>1,325</b>	<b>1,268</b>	<b>161</b>	<b>2,754</b>
<b>Total Complaints</b>	<b>1,038</b>	<b>929</b>	<b>122</b>	<b>2,089</b>

The OCRC also records the issue, or alleged discriminatory action related to each complaint. These are presented in Table IV.15. In the same way that bases are reported, more than one issue may be associated with each complaint. Across the NEOSCC Region, 2,627 issues were cited, with terms and conditions cited 901 times, far more than other issues. Next most common was reasonable accommodation, with 342 instances, then exclusion (208); followed by harassment (172) and intimidation (145). The issues cited within each of the three planning areas lead to slightly differing conclusions. NEFCO had a substantially higher rate of issues pertaining to terms and condition, 553 versus 288 in NOACA and 60 in Eastgate, or 46 percent of all issues, compared to 40.8 percent in Eastgate and 22.6 percent in NOACA.

**Table IV.15**  
**Fair Housing Complaints by Issue**

NEOSCC Region  
2004–2012 OCRRC Data

Issue	NOACA Region	NEFCO Region	Eastgate Region	NEOSCC Region
Terms and Conditions	288	553	60	901
Reasonable Accommodation	179	135	28	342
Exclusion	188	15	5	208
Harassment	99	69	4	172
Intimidation	35	101	9	145
Advertising	72	21	2	95
Sexual Harassment	21	24	1	46
Discharge	2		1	3
Constructive Discharge		1		1
Demotion		1		1
Maternity	1			1
Recall	1			1
Testing	1			1
Other	390	283	37	710
<b>Total Issues</b>	<b>1,277</b>	<b>1,203</b>	<b>147</b>	<b>2,627</b>
<b>Total Complaints</b>	<b>1,038</b>	<b>929</b>	<b>122</b>	<b>2,089</b>

## FAIR HOUSING CONTACT SERVICE

In Summit, Stark, Portage, and Medina counties of the NEOSCC Region, the FHCS provides a range of fair housing services, including processing complaints.

Table IV.16 presents these complaints by basis. As shown, the primary complaint basis was disability, with 585 complaints. Next-most common were race, with 290, and familial status, with 258. The number of complaints was highest in 2006 and 2008, with 266 and 248 complaints, respectively. The lowest numbers of complaints came in 2004 and 2005, with as few as 27 complaints in 2005.

**Table IV.16**  
**Fair Housing Complaints by Basis**

NEOSCC Region  
2004–2012 FHCS Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability	36	8	89	72	80	69	86	86	59	585
Race	23	8	59	36	42	43	31	31	17	290
Familial Status	15	4	42	26	49	30	40	43	9	258
Sex	6	3	22	13	16	18	17	13	18	126
Retaliation	2		15	10	15	19	9	8	5	83
National Origin			16	3	9	10	6	4	2	50
Color	4	4	9	8	9			3	1	38
Harassment				3	7	3	3			16
Criminal Background					2	2	1		1	6
Advertising	5									5
Ancestry	1			1	1				1	4
Age					1	1		1		3
Other				6	16	9	4	1	2	38
None			14							14
Unknown				6	1					7
<b>Total Bases</b>	<b>92</b>	<b>27</b>	<b>266</b>	<b>184</b>	<b>248</b>	<b>204</b>	<b>197</b>	<b>190</b>	<b>115</b>	<b>1,523</b>
<b>Total Complaints</b>	<b>72</b>	<b>21</b>	<b>216</b>	<b>142</b>	<b>201</b>	<b>149</b>	<b>163</b>	<b>175</b>	<b>101</b>	<b>1,240</b>

## THE HOUSING RESOURCE AND ADVOCACY CENTER

Working almost exclusively in Cuyahoga County of the NEOSCC Region, the HRAC provides a range of fair housing services, including testing and enforcement activities associated with fair housing complaints. As noted in Table IV.17, between 2004 and 2012, the agency received some 462 complaints, with the primary bases being disability, race, and familial status

**Table IV.17**  
**Fair Housing Complaints by Basis**

1. Northeast Ohio Region  
2004–2012 HRAC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability	2		9	15	18	22	55	43	52	216
Race	2	11	13	13	21	14	25	15	25	139
Familial Status	1	2	5	5	5	8	14	8	4	52
Gender			2	1		4	2	8	10	27
Color				1					25	26
Sex			1	2	1	3	13	4	2	26
National Origin	1		1	5	2		2	2	8	21
Other									11	11
Ethnicity								1	8	9
Religion					1	2	2		2	7
Sexual Orientation			1		1		3	1		6
Source of Income			4	1	1					6
Age						1	1		3	5
Criminal History				1			2		2	5
N.A.								5		5
Retaliation					3		1			4
Accessibility						1				1
Sexual Harassment						1				1
<b>Total Bases</b>	<b>6</b>	<b>13</b>	<b>36</b>	<b>44</b>	<b>53</b>	<b>56</b>	<b>120</b>	<b>87</b>	<b>152</b>	<b>567</b>
<b>Total Complaints</b>	<b>6</b>	<b>13</b>	<b>24</b>	<b>40</b>	<b>48</b>	<b>50</b>	<b>105</b>	<b>78</b>	<b>98</b>	<b>462</b>

As seen in Table IV.18, more than 90 percent of all HRAC complaints related to alleged infractions in the rental markets, with 417 of 462 complaints

**Table IV.18**  
**Fair Housing Complaints by Issue**

1. Northeast Ohio Region  
2004–2012 HRAC Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Rental	6	10	21	31	44	49	95	76	85	417
Sale		3	2	8	2		1	2	2	20
Other			1	1	1	1	4		9	17
Shelter							5			5
Mortgage					1				2	3
<b>Total</b>	<b>6</b>	<b>13</b>	<b>24</b>	<b>40</b>	<b>48</b>	<b>50</b>	<b>105</b>	<b>78</b>	<b>98</b>	<b>462</b>
<b>Total Complaints</b>	<b>6</b>	<b>13</b>	<b>24</b>	<b>40</b>	<b>48</b>	<b>50</b>	<b>105</b>	<b>78</b>	<b>98</b>	<b>462</b>



The HRAC also tracks the types of actions taken by the agency, whether the matter was pursued through litigation referred to another agency. Almost 43 percent of all their complaints were referred to the OCRC; and the agency conducted 44 tests, as noted in Table IV.19, below.

**Table IV.19**  
**Fair Housing Complaints by Action Taken**  
1 Northeast Ohio Region  
2004–2012 HRAC Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Referred to OCRC	4	12	11	23	30	13	41	21	43	198
Fair Housing Info Given			8	7	9	23	24	30	56	157
Reasonable Accommodation	1		1	3	4	6	12	15	12	54
HRAC Conducted Test		8	6	7	13	3	1	5	1	44
Referred to Attorney	2			6	3	1	10	8		30
Referred to City			3			2	9	1	5	20
Agency complaint with OCRC		1	1	1				2	1	6
Referred to ACLU				1						1
<b>Total</b>	<b>7</b>	<b>21</b>	<b>30</b>	<b>48</b>	<b>59</b>	<b>48</b>	<b>97</b>	<b>82</b>	<b>118</b>	<b>510</b>
Total Complaints	6	13	24	40	48	50	105	78	98	462

## FAIR HOUSING RESOURCE CENTER

In Lake, Geauga, and Ashtabula counties, the FHRC provides enforcement, testing, and other fair housing services, and processes housing discrimination complaints.

As shown in Table IV.20, 370 complaints were filed over the period with the FHRC. By far the most common basis for these complaints was disability, with 183 bases. Only 52 bases were cited for race and 33 for family status, though these were the next-most common.

**Table IV.20**  
**Fair Housing Complaints by Basis**  
NEOSCC Region  
2004– 2012 FHRC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability	44	24	24	13	6	16	27	13	16	183
Race	16	6	7	2	4	3	6	6	2	52
Family Status	5	12	5	3	2	2		2	2	33
National Origin	4		4					1		9
Sex	2		3			1				6
Other	3	4	11	19	11	6	11	15	13	93
<b>Total Bases</b>	<b>74</b>	<b>46</b>	<b>54</b>	<b>37</b>	<b>23</b>	<b>28</b>	<b>44</b>	<b>37</b>	<b>33</b>	<b>376</b>
Total Complaints	74	46	54	37	23	28	43	33	32	370

These complaints are shown by issue type in Table IV.21; the FHRC reports the housing market in which the complaint occurred rather than the type of discrimination. As shown, nearly all complaints (355 out of 370) were in the rental market.

**Table IV.21**  
**Fair Housing Complaints by Issue Type**  
 NEOSCC Region  
 2004– 2012 FHRC Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Rental	74	45	52	30	21	27	42	33	31	355
Advertising			2	7	2	1	1		1	14
Sales		1								1
<b>Total</b>	<b>74</b>	<b>46</b>	<b>54</b>	<b>37</b>	<b>23</b>	<b>28</b>	<b>43</b>	<b>33</b>	<b>32</b>	<b>370</b>

## C. FAIR HOUSING SURVEY – PRIVATE SECTOR RESULTS

Additional evaluation of fair housing within the NEOSCC Region was conducted via an online survey of stakeholders conducted from November of 2012 to July of 2013. The purpose of the survey, a relatively qualitative component of the Regional AI, was to gather insight into the knowledge, experiences, opinions, and feelings of stakeholders and interested citizens regarding fair housing. There were 183 respondents to the survey, with 81 in NOACA, 48 in NEFCO, and 54 in Eastgate. Consequently, the findings are not separated by planning area but are reported for the entire NEOSCC Region in the following narratives. Results and comments related to the questions in the private sector are presented in the following narrative, and additional survey results are discussed in **Sections V and VI**.

The NEOSCC Region 2012–2013 Fair Housing Survey for Housing Stakeholders was completed by 183 respondents. Individuals solicited for participation included representatives of housing groups, minority organizations, disability resource groups, real estate and property management associations, banking entities, and other groups involved in the fair housing arena. Most questions in the survey required simple “yes,” “no,” or “don’t know” responses, although many questions allowed the respondent to offer written comments. For example, when many respondents reported that they were aware of questionable practices or barriers, or when multiple narrative responses indicated similar issues, findings suggested likely impediments to fair housing choice.

Numerical tallies of results and summaries of some comment-driven questions are presented in this section. A complete list of written responses is available in **Volume III**.

### FAIR HOUSING IN THE PRIVATE SECTOR

In order to address perceptions of fair housing in the NEOSCC Region’s private housing sector, survey respondents were asked to identify their awareness of possible housing discrimination issues in a number of areas within the private housing sector, including the:

- Rental housing market,
- Real estate industry,
- Mortgage and home lending industry,
- Housing construction or accessible housing design fields,
- Home insurance industry,
- Home appraisal industry, and
- Any other housing services.

If respondents indicated that they were aware of possible discriminatory issues in any of these areas, they were asked to further describe issues in a narrative fashion. Tallies for each question are presented in Table IV.22.

**Table IV.22**  
**Barriers to Fair Housing in the Private Sector**  
 NEOSCC Region  
 2012–2013 Fair Housing Survey for Housing Stakeholders Data

Question	Yes	No	Don't Know	Missing	Total
<b>Are you aware of any questionable practices or barriers to fair housing choice in:</b>					
The rental housing market?	36	60	26	61	183
The real estate industry?	19	64	36	64	183
The mortgage and home lending industry?	23	54	45	61	183
The housing construction or accessible housing design fields?	17	57	48	61	183
The home insurance industry?	15	53	54	61	183
The home appraisal industry?	13	53	54	63	183
Any other housing services?	7	57	53	66	183

### ***Rental Housing***

Regarding barriers to fair housing choice in the rental housing market, 36 respondents noted awareness of fair housing issues in this area; however, 61 respondents did not answer this question. Some respondents—26—did not know about rental housing barriers, and 60 respondents reported that they were not aware of such barriers. Respondents were asked to discuss their concerns in narrative format if they replied “yes.” Comments on this question related to discrimination based on:

- Disability and need for reasonable accommodations including allowing pets,
- Race- or national origin-based refusal to rent, and
- Family and marital status, for families with children or unmarried parents.

### ***Real Estate Industry***

Only 19 respondents reported awareness of barriers to fair housing choice in the real estate industry, although the majority did not know or did not respond. Narrative comments included mentions of steering to particular neighborhoods.

### ***Mortgage and Home Lending Industry***

Regarding barriers to fair housing choice in the lending or mortgage industries, 23 respondents noted awareness of fair housing issues. Comments suggested that racial and ethnic minority applicants were more frequently denied or received lower-quality loans than did white applicants.

### ***Housing Construction or Accessible Housing Design Fields***

Barriers to fair housing choice in the housing construction or accessible housing design fields were also addressed in the survey. When asked if they were aware of fair housing issues in these areas, 17 respondents said yes. Persons who were aware of issues in the housing

construction or accessible housing design fields were also asked to provide specific examples of these issues. Respondents indicated that many homes are not accessible, that builders lack knowledge of or chose to ignore regulations, and that there is a lack of enforcement for accessibility.

### ***Home Insurance Industry***

Only 15 respondents noted barriers to fair housing choice in the home insurance industry, although many of those who took the survey did not respond or said that they did not know. Some comments suggested that it is difficult to insure homes in neighborhoods with older housing stock, abandoned properties, or low-income residents.

### ***Home Appraisal Industry***

The home appraisal industry was also investigated as part of the survey. When asked, 13 respondents noted that they were aware of barriers to fair housing choice in the home appraisal industry. Some respondents commented that appraisers make assumptions about properties based on neighborhood quality, and that they may consider minority racial areas as a detriment to property values.

### ***Any Other Housing Services***

Respondents were also asked to discuss their awareness of barriers to fair housing in any other area of the private housing sector. Only 7 respondents noted awareness of other issues, but many did not know or did not respond. Mentioned in the comments was uneven treatment in the rental and for-sale markets based on the poverty or racial minority makeup of neighborhoods.

## **D. SUMMARY**

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Evaluation of the private housing sector included review of home mortgage loan application information, mortgage lending practices, fair housing complaint data, and results from the private sector section of the 2012–2013 Fair Housing Survey for Housing Stakeholders.

Home Mortgage Disclosure Act (HMDA) data were used to analyze differences in home mortgage application denial rates in the NEOSCC Region by race, ethnicity, sex, income, and Census tract. Evaluation of home purchase loan applications from 2004 through 2011 showed that there were 328,557 loan originations and 65,149 denials, for an eight-year average loan denial rate of 16.5 percent. Denial rates were highest in 2006, at 20.0 percent. These HMDA data also showed that American Indian, black, and Hispanic applicants experienced far higher rates of loan denials than did white or Asian applicants, even after correcting for income in most cases. Further, these more frequently denied racial and ethnic groups may have been disproportionately impacted in some specific areas of the Region.

Analysis of originated loans with high annual percentage rates showed that black and Hispanic populations were also disproportionately issued these types of lower-quality loan products. Black borrowers experienced a rate nearly twice that of white applicants, for example. With



high proportions of low quality, high-annual percentage rate loans being issued to these particular groups, the burden of foreclosure may have fallen more heavily upon them.

Analysis of data from the CRA, which is intended to encourage investment in low- and moderate-income areas, showed that business loans did not tend to be directed toward the areas with highest poverty concentrations in the NEOSCC Region as commonly as they were toward moderate- and higher-income areas.

Fair housing complaint data were analyzed from HUD, the OCRC, the FHCS, and the FHRC. HUD data showed that 2,297 fair housing–related complaints were filed in the Region from 2004 through September of 2012. The number of complaints filed with this agency varied by year, ranging from 205 to 347. The protected classes most impacted by discrimination, based on the 1,184 complaints where cause was found, were disability, familial status, and race, and the most common complaint issues related to failure to make reasonable accommodation, discrimination in terms, conditions or privileges relating to rental, and discriminatory refusal to rent.

Complaints filed with the OCRC showed that of the 2,089 complaints, the most common issues were terms and conditions, reasonable accommodation, exclusion, harassment, and intimidation.

Results from the private sector portion of the 2012–2013 Fair Housing Survey for Housing Stakeholders, conducted from November of 2012 to July of 2013 as part of the Regional AI process, showed that some respondents saw possible issues of housing discrimination in the NEOSCC Region’s private housing sector.



## **V. BARRIERS TO HOUSING CHOICE IN THE PUBLIC SECTOR**

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While the previous section presented a review of the status of fair housing in the private sector, this section will focus specifically on fair housing in the public sector. HUD recommends that the Regional AI investigate a number of housing factors within the public sector, zoning and land use policies, past public infrastructure development and the placement of public housing.

### **A. PUBLIC INFRASTRUCTURE DEVELOPMENT**

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Community features, including public services and facilities, are essential parts of good neighborhoods, leading to a more desirable community and more demand for housing in these areas. The following narrative addresses the location of public transit as it relates to where people live and work, as well as evaluating the location of assisted and public housing and public policies and practices in connection to fair housing choice.

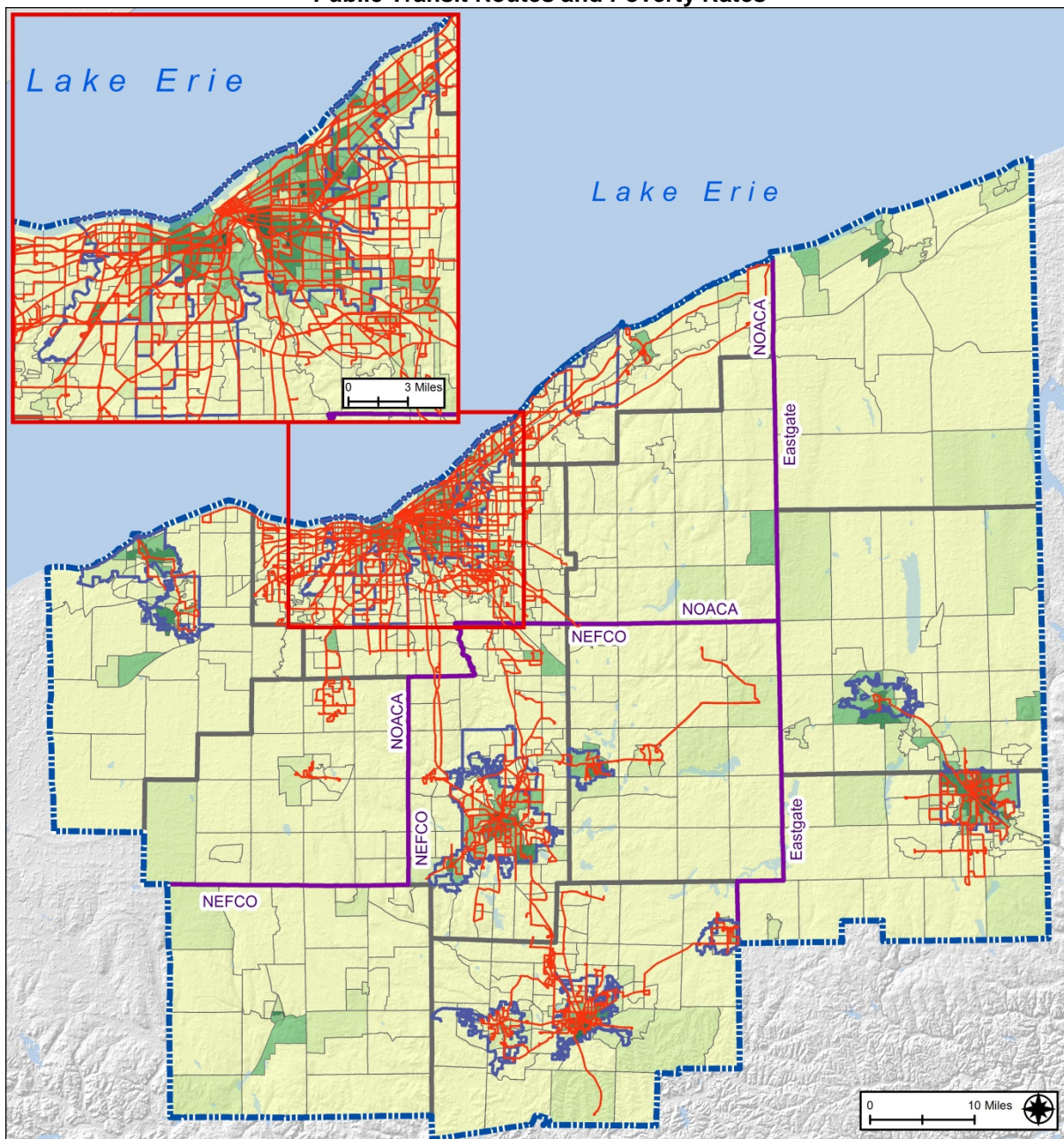
#### **PUBLIC TRANSPORTATION**

Many parts of the NEOSCC Region are thoroughly served with public transportation access, as shown in Map V.1. As shown, the Cleveland area had the highest level of concentration of transit routes, covering nearly all of the areas with higher incidences of poverty. In almost all of the entitlement cities, public transportation routes cover all or most of the city, and some reach out to smaller communities nearby. On the other hand, a few more rural areas of the 12-county region, and some areas of each of the three planning areas, there were concentrations of poverty but also a lack of public transit service. These include some city tracts in Lorain, Elyria, and Warren, where poverty was above 60 percent in some places but no transit routes served the poorest tracts.

#### **JOB TRAINING CENTERS**

The provision of employment services such as job training centers is also an important component of public services. To better assist in reviewing the capacity and planning for public transit, Map V.2 has been prepared to compare the reach of the public transit system and centers where individuals can receive job and employment training. The Ohio Department of Job and Family Services (ODJFS) certifies job training centers in the State, and some of these are located in the NEOSCC Region in high-poverty tracts where they are needed. However, a number of job training centers in the Region lack public transportation access, located in all three of the planning areas. A few high-poverty tracts, such as in Warren, Lorain, and rural Lorain County, were not served or were not widely served.

**Map V.1**  
**Public Transit Routes and Poverty Rates**



### LEGEND

#### Public Transit Routes and Poverty Rates

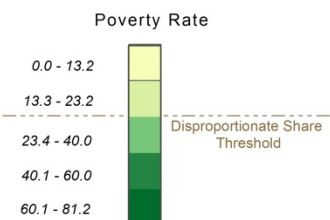
2006–2010 Average Poverty Rate Among All Census Tracts in the NEOSCC Region = 13.2%

Disproportionate Share Threshold = 23.2% (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
- MPO/COG Boundaries
- Public Transit Routes
- NEOSCC Boundary

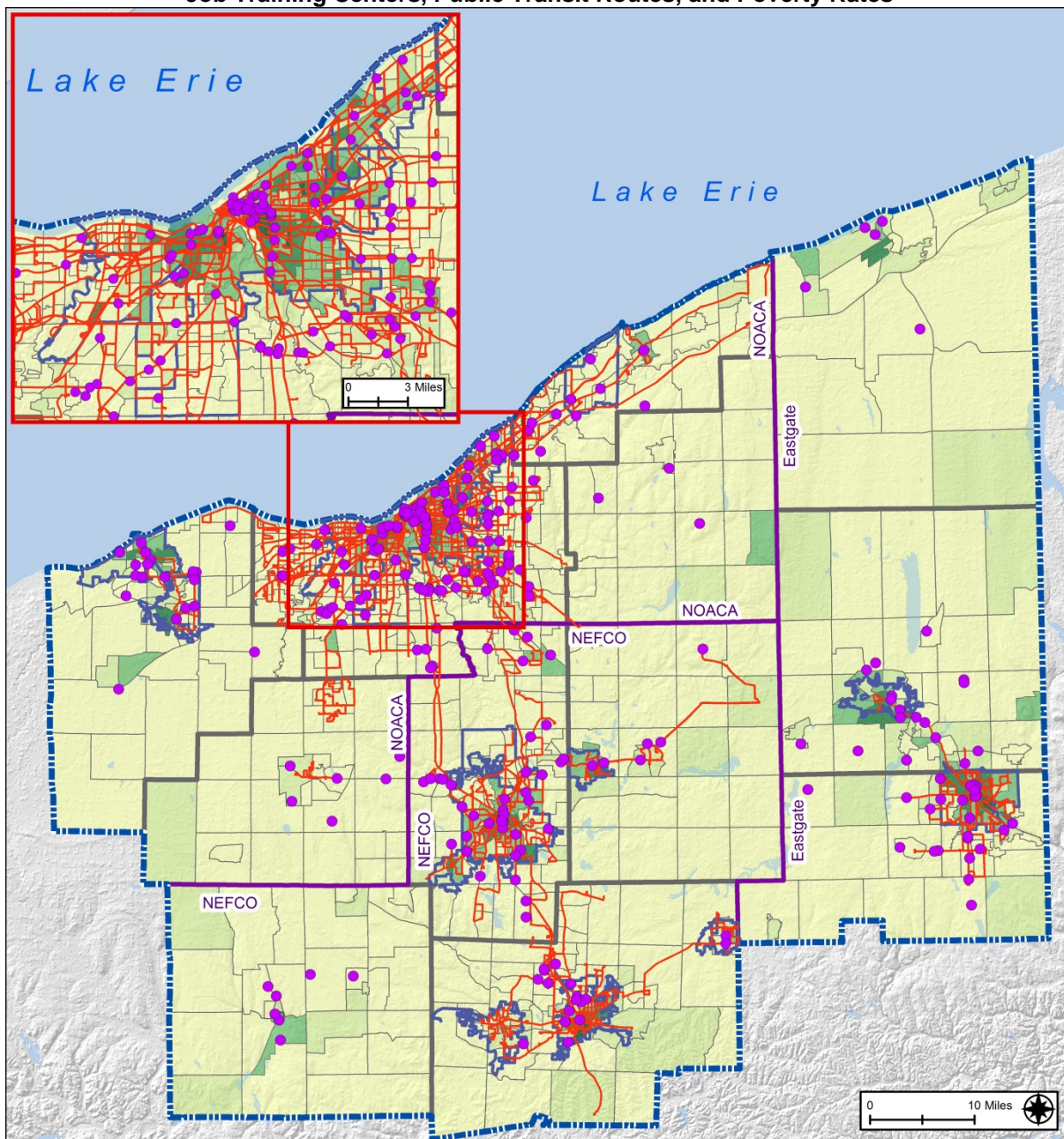
NOTE: The Counties of Cuyahoga, Lake, Stark, and Summit are also entitlement areas.

Data Source: NEOSCC, 2006–2010 ACS





**Map V.2**  
**Job Training Centers, Public Transit Routes, and Poverty Rates**



### LEGEND

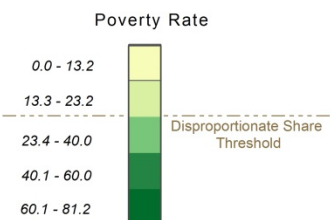
#### Job Training Centers, Public Transit Routes, and Poverty Rates

2006–2010 Average Poverty Rate Among All Census Tracts in the NEOSCC Region = 13.2%  
 Disproportionate Share Threshold = 23.2% (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
- MPO/COG Boundaries
- ODJFS Certified Job Training Center
- Public Transit Routes
- NEOSCC Boundary

Data Source: NEOSCC, 2006–2010 ACS

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



## PUBLIC AND ASSISTED HOUSING

Public or assisted housing can exist in several forms, including low-income housing projects, housing voucher programs, and supportive housing. However, it may be of concern where such housing is located, particularly if such housing is continually located in specific areas, thereby potentially concentrating such residents in certain areas. To explore this particular concept, multi-family housing projects and Low Income Housing Tax Credit (LIHTC) data were downloaded from HUD.

As presented in Map V.3, there does seem to be some higher incidence of locating this form of housing in areas that have lower incomes. Certainly, there are some constraints on locating such facilities throughout the 12-county area, such as the existence of a sewer system, but that alone cannot fully explain the degree to which such housing is concentrated in particular areas. The map shows multi-family housing properties funded by HUD rental assistance and their relation to areas of poverty.<sup>32</sup> As shown, these units were scattered widely across the Region, with many located in the highest-poverty tracts; however, some poor tracts in Cleveland, Lorain, and Akron were not served. Some properties were also located in low-poverty tracts in the Region; this is essential for creating healthy neighborhoods and limiting the concentration of poverty.

Further, when viewing LIHTC projects, as shown in Map V.4, the same issues can be identified.

Map V.5 shows public housing developments funded by HUD. As shown, the majority of these were in Cleveland, Akron, and Canton, with the largest projects in high- and medium-high-poverty areas in Cleveland.

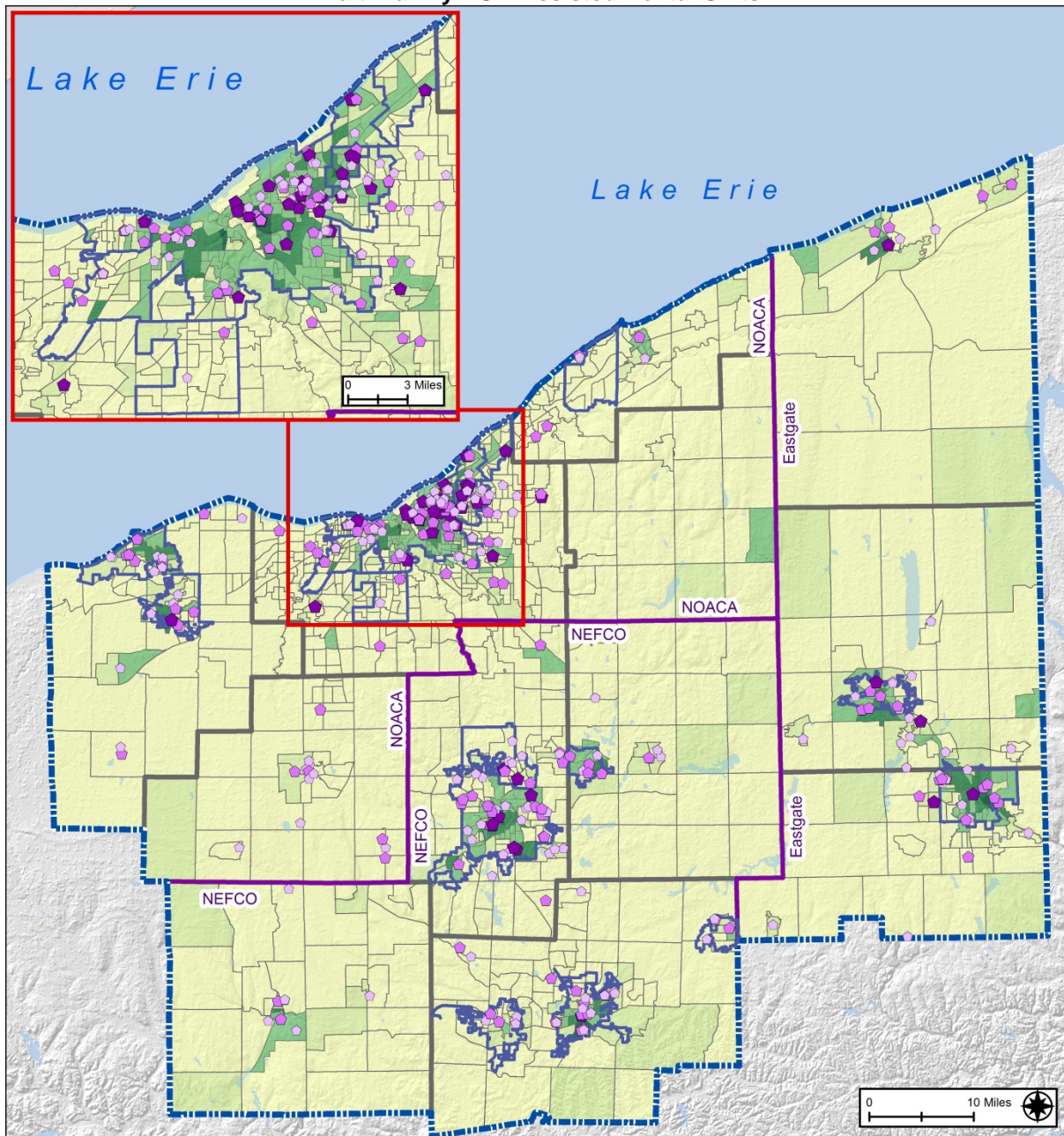
Map V.6 shows individual housing choice vouchers from the Section 8, rent supplement, Rental Assistance Payment, Below-Market Interest Rate, Project Rental Assistance Contracts, and Section 202/162 Project Assistance Contract programs. There were 32,699 of these in use in May 2013, with many at the same addresses. Still, these addresses were scattered fairly widely across the Region, with many in the larger cities, though these assistance types were also represented in smaller communities.

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<sup>32</sup> (HUD MFH 2013)



**Map V.3**  
**Multi-Family HUD-Assisted Rental Units**



### LEGEND

#### 2012 Multifamily Assisted Housing and 2010 Poverty

2006–2010 Average Poverty Rate Among All Census Tracts in the NEOSCC Region = 13.2%

Disproportionate Share Threshold = 23.2%

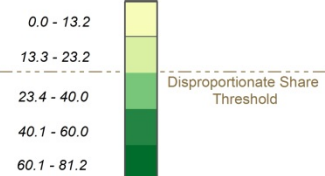
- Census Tract Boundaries
- Entitlement City Boundaries
- MPO/COG Boundaries
- NEOSCC Boundary

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

#### HUD Assisted Multifamily Units Under Contract

- ◆ 4 - 50
- ◆ 51 - 150
- ◆ 151 - 484

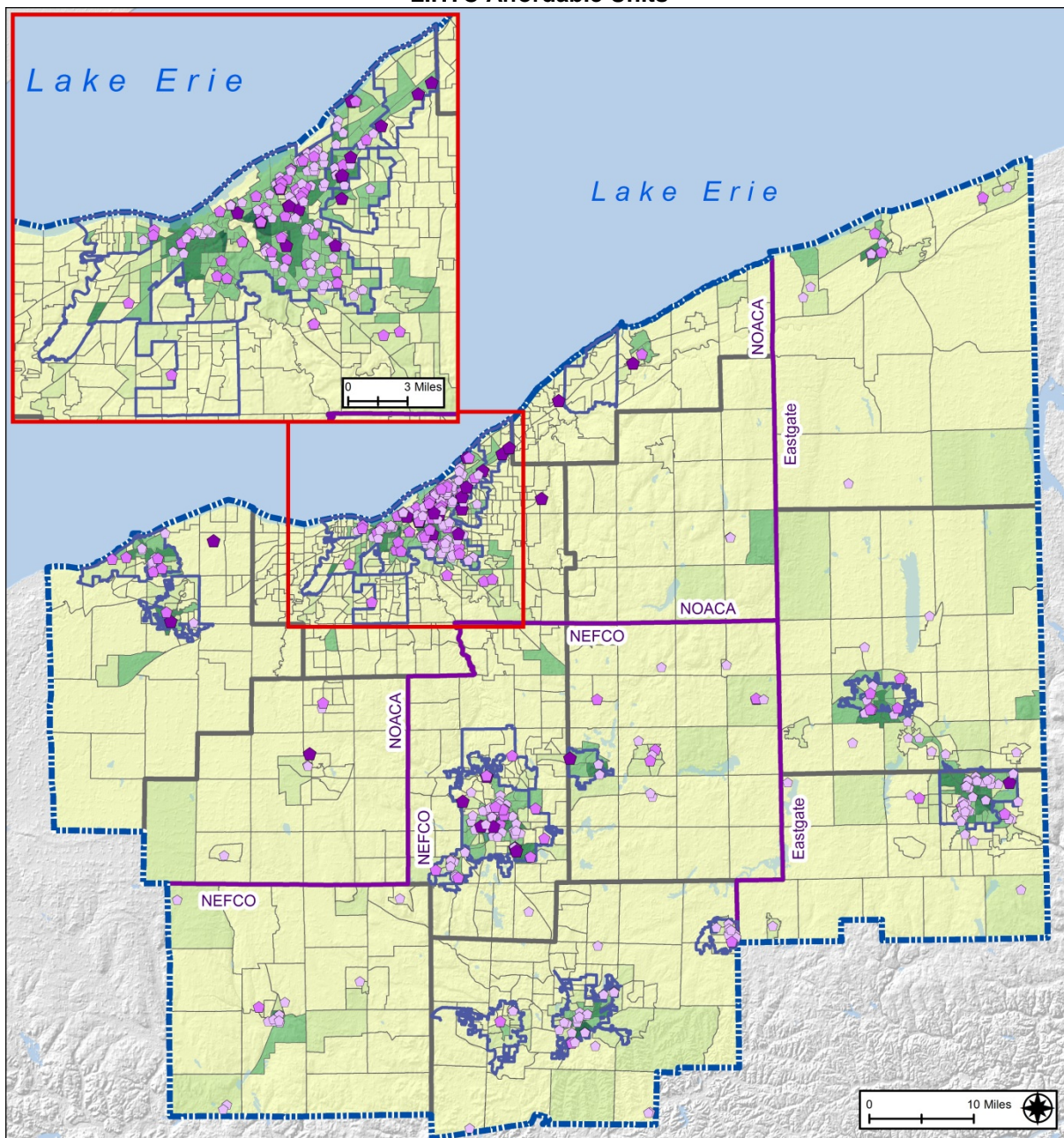
#### Poverty Rate



Data Source: December 2012 HUD FHA Office of Multifamily Housing Programs, 2006–2010 ACS



**Map V.4**  
**LIHTC Affordable Units**



### LEGEND

#### 2012 LIHTC Affordable Units and 2010 Poverty

2006–2010 Average Poverty Rate Among All Census Tracts in the NEOSCC Region = 13.2%

Disproportionate Share Threshold = 23.2%

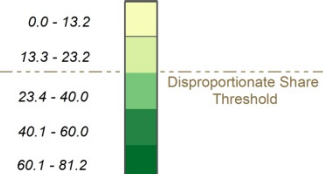
- Census Tract Boundaries
- Entitlement City Boundaries
- Housing Market Boundaries
- NEOSCC Boundary

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

#### LIHTC Affordable Units

- 1 - 50
- 51 - 150
- 151 - 500

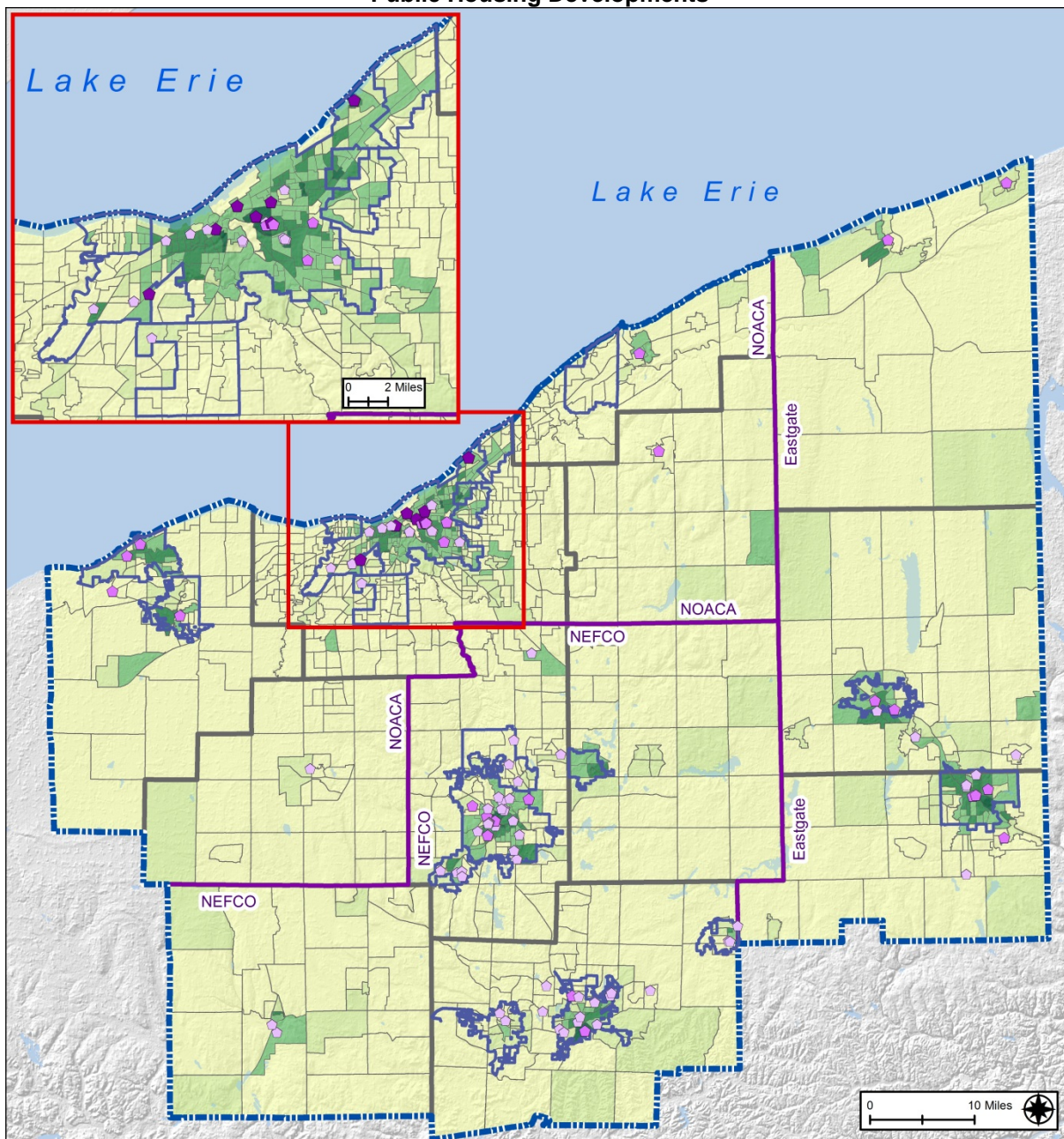
#### Poverty Rate



Data Source: August 2012 HUD PDR LIHTC Database, 2006–2010 ACS



**Map V.5**  
**Public Housing Developments**



### LEGEND

#### 2013 Public Housing Developments and 2010 Poverty

2006–2010 Average Poverty Rate Among All Census Tracts in the NEOSCC Region = 13.2%

Disproportionate Share Threshold = 23.2%

- Census Tract Boundaries
- NEOSCC Boundary
- Entitlement City Boundaries
- Housing Market Boundaries

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

Data Source: May 2013 HUD, 2006–2010 ACS

Number of Households in Development

- 2 - 50
- 51 - 150
- 151 - 261

Poverty Rate

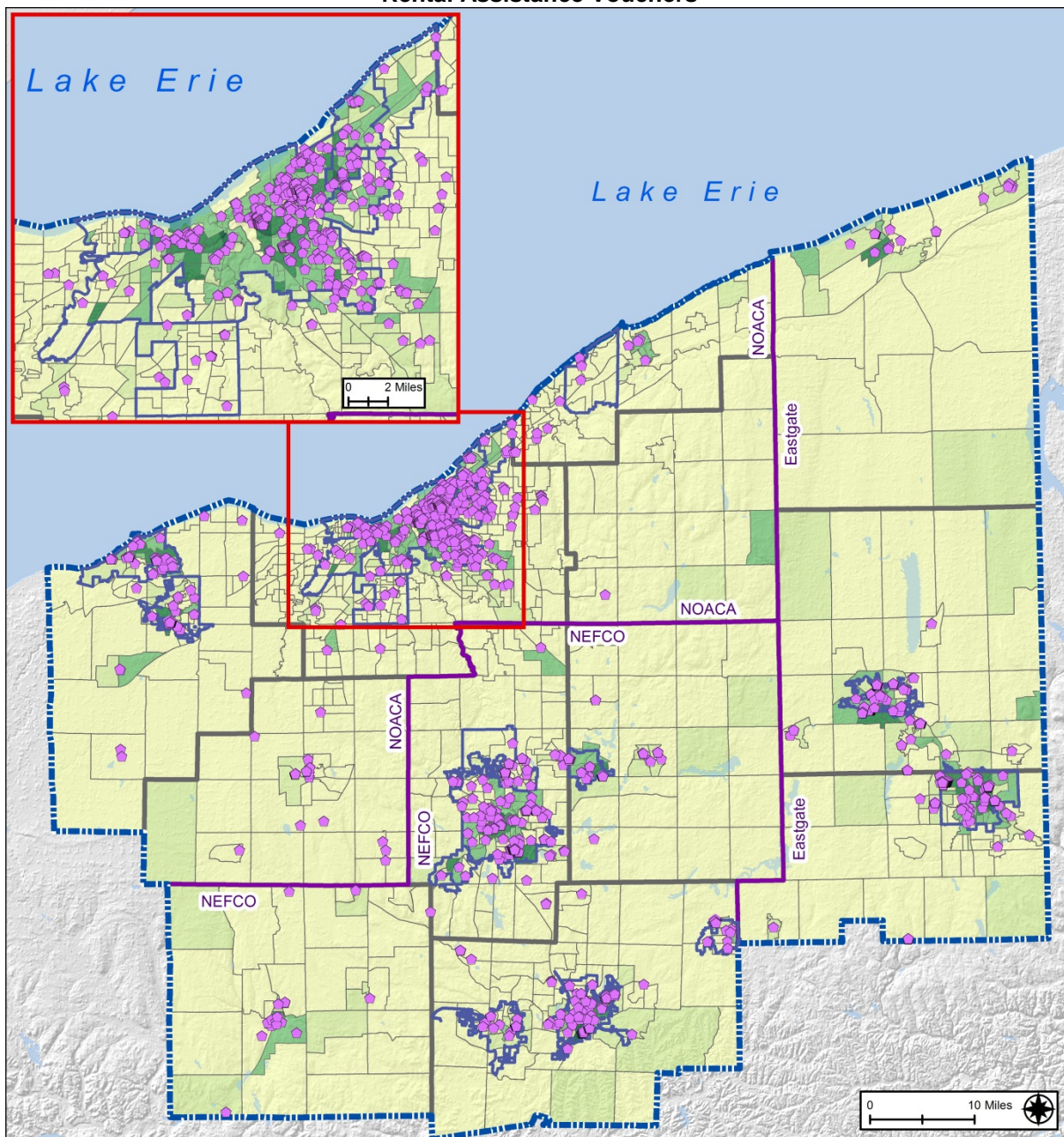
- 0.0 - 13.2
- 13.3 - 23.2
- 23.4 - 40.0
- 40.1 - 60.0
- 60.1 - 81.2



Disproportionate Share Threshold



**Map V.6**  
**Rental Assistance Vouchers**



### LEGEND

#### 2013 Rental Assistance Vouchers and 2010 Poverty

2006–2010 Average Poverty Rate Among All Census Tracts in the NEOSCC Region = 13.2%

Disproportionate Share Threshold = 23.2%

- Census Tract Boundaries
- Entitlement City Boundaries
- Housing Market Boundaries
- NEOSCC Boundary

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

Data Source: May 2013 HUD, 2006–2010 ACS

Rental Assistance Voucher



Poverty Rate

0.0 - 13.2  
13.3 - 23.2  
23.4 - 40.0  
40.1 - 60.0  
60.1 - 81.2



Disproportionate Share Threshold

## B. FAIR HOUSING SURVEY FOR GOVERNMENT OFFICIALS

This section contains data gathered from the nonentitlement community survey conducted with planners across the Region's many nonentitlement cities and counties. Through this online survey instrument, public sector policies were evaluated from November 2012 through July 2013 with planning, community development, building, and other staff. This method allowed the collection of thorough answers to key questions about public sector policies. The survey received 172 responses.

As shown in Table V.1, policies relating to housing development, special needs housing, and fair housing were addressed for each area in order to evaluate the public sector environment for a variety of housing types, including affordable housing, mixed-use housing, senior housing, and group homes. Local planning and community development staff provided details on many elements of their jurisdictions' policies. Survey questions related to zoning ordinances, planning policies, and land use practices such as:

- Definitions of "dwelling unit" and "family";
- Occupancy standards;
- Definitions of "disability";
- Development standards for housing for persons with disabilities;
- Programs or practices relating to the development of affordable, mixed-use, accessible, or senior housing; and
- Policies relating to group homes or other special needs housing.

**Table V.1**  
**Barriers to Fair Housing in the Public Sector**  
 NEOSCC Region  
 2013 Fair Housing Survey for Government Officials Data

Question: Does your jurisdiction have...	Yes	No	Don't Know	Missing	Total
<b>Housing Development</b>					
Definitions for "dwelling unit" or "residential unit"?	62	14	21	75	172
Guidelines that encourage development affordable housing units?	18	58	20	76	172
Any potential barriers to the development of low- to moderate- income housing?	25	51	21	75	172
Guidelines that allow the development of mixed use housing?	47	27	20	78	172
Any potential barriers to the development of mixed use housing?	34	33	27	78	172
<b>Occupancy Standards</b>					
A definition for the term "family"?	44	28	24	76	172
Residential occupancy standards or limits?	27	36	30	79	172
<b>Special Needs Housing</b>					
A definition for the term "disability"?	17	43	25	87	172
Development standards for making housing accessible to persons with disabilities?	16	41	26	89	172
A process by which persons with disabilities can request modification to the jurisdiction's policies?	24	31	30	87	172
Standards for the development of senior housing?	13	48	23	88	172
Guidelines that distinguish senior citizen housing from other residential uses?	18	40	26	88	172
Guidelines for developing housing for any other special needs populations?	22	40	23	87	172
<b>Fair Housing Policies</b>					
A fair housing ordinance, policy, or regulation?	28	26	29	89	172
Policies or practices for "affirmatively furthering fair housing"?	29	29	23	91	172

## DEFINITIONS

Fair housing laws seek to protect classes of persons with certain attributes from discrimination, including individuals with disabilities, seniors, and families with children. In order to support these protected classes, it is helpful to have accurate definitions of these classes and to consider the potential effects of zoning and land use policies when it concerns them. Some definitions of “dwelling” or “residential unit” can hinder the provision of housing for disabled or other special needs persons, and can inadvertently discriminate against boarding or care facilities.

### *Dwelling Unit Definitions*

Of those who responded, 62 respondents noted that their jurisdictions have definitions for “dwelling unit.” A few examples of common definitions for “dwelling unit” are presented below. The following definitions may present barriers or impediments to housing choice for nontraditional households, by defining dwelling units for “families” only:

- Any room or group of rooms located within a dwelling and forming a single habitable household unit with facilities that are used or intended to be used for living, sleeping, cooking and eating by a family.
- ...one or more rooms intended to be occupied by and providing facilities for one family including rooms and/or facilities for bathing and toilet and only one kitchen or kitchenette.
- A space within a dwelling, comprising living, dining, sleeping room or rooms, storage closets, as well as space and equipment for cooking, bathing, and toilet facilities, all used by only one family and its household employees.

These definitions are flexible for housing units of many types, including mobile homes and accessory dwellings, but on their own may not include some types of housing that may be required for persons of special needs, such as group homes, because only one family is permitted in a dwelling unit.

### *Family Definitions*

Some 44 respondents define “family” in their communities’ ordinances, and some of these definitions exclude households of non-related persons. In addition, some jurisdictions have limiting policies that restrict the number of residents allowed per dwelling unit, in addition to safety and building codes required by federal law.

A few definitions from nonentitlement city respondents in the Region that may not be in the spirit of affirmatively furthering fair housing (AFFH) by restricting household size based on related/unrelated persons and numerical restriction on number of persons:

- An individual or two (2) or more persons related by blood, marriage, guardianship, or legal adoption living together as a single housekeeping unit within a dwelling unit, plus no more than one (1) roomer or domestic servant. A family may also not consist of not more than three (3) unrelated persons.



- One (1) or more persons occupying the premises and living as a single housekeeping unit, as distinguished from a group occupying a boarding house, lodging house, club, fraternity, or hotel.
- Up to five (5) persons above the age of eighteen (18) and up to six (6) persons below the age of eighteen (18) who are related by blood, adoption, marriage, or guardianship to any of the first five above eighteen (18) years of age.

These definitions do not allow for families of any size made up of related or unrelated persons, and so prevent a large nontraditional family or group of unrelated persons from living together. In addition, some definitions exempted group homes or boarding houses; if these homes are not defined and allowed elsewhere in the code, this may be seen as discrimination against persons of special needs who live in group homes.

### ***Occupancy Standards***

Additionally, 27 respondents said their communities impose limits on the number of persons allowed in each dwelling unit (outside international building codes for health and safety), such as per bedroom or according to square footage. One respondent said that these restrictions apply only to rental housing; depending on the reasoning and application, such a policy could be seen as potentially discriminatory. Communities with definitions that may exclude selected persons may not be in the spirit of AFFH.

## **AFFORDABLE HOUSING DEVELOPMENT**

There were 18 respondents reported guidelines that encourage the development of affordable housing units, such as zoning districts that allow for smaller lots or a variety of nontraditional housing styles. A few persons said that their jurisdictions connect developers with federal or State community development funding for affordable housing projects, and one noted that such housing is addressed in the city's comprehensive plan.

However, 25 respondents noted potential barriers to affordable housing, with the most common barrier reported being that of neighborhood resistance, or NIMBYism. While neighborhood response is not a public sector control, cities that allow this resistance to sway their decisions about development applications may be in violation of the Fair Housing Act.<sup>33</sup> High land values was also cited as a barrier to affordable housing development in some cities; however, this was not a common response. In addition, while not strictly applicable to affordable housing, several communities noted that only single-family zoning was allowed, thus excluding multi-family housing such as apartments, and possibly excluding some group homes or other types of housing. Such a policy may be overly restrictive for some groups.

## **MIXED-USE HOUSING DEVELOPMENT**

Any building, set of buildings, or neighborhood used for more than one purpose is considered mixed-use, as are housing units included in such a property or development. Many respondents, 47, allow mixed-use development housing, and a few of these mentioned

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<sup>33</sup> (DOJ and HUD 1999)

financial incentives for such housing. However, 34 respondents indicated that barriers to mixed-use housing development exist; these commonly included zoning that only allows for single-family housing, thus excluding mixed-use projects that include housing. Large lot zoning requirements were also noted.

## **SPECIAL NEEDS HOUSING**

### ***Accessible Housing Policies***

Formal standards for accessible housing—including definitions, requirements for a portion of large developments, or bonuses or incentives—often improve the supply of such housing and better serve the needs of disabled persons.

Only 17 respondents in the Region replied that their communities define “disability” in their policies, and some of these merely mentioned the Americans with Disabilities Act, rather than a definition in local codes.

Only 16 persons said that their communities have specific standards for the construction of accessible multi-family housing other than building codes, and many of these referred only to county and state building codes, not citing any particular local policies.

While 24 respondents said that there was a policy in place for persons with disabilities to request a variance if necessary for accessible housing, none of these noted policies that make this process easy. Most common responses related to a standard variance application process, rather than any administrative process which may make such an application simple, efficient, and cost-effective for disabled persons and allow them to make necessary changes easily.

### ***Senior Housing Policies***

The senior population often requires specialized housing and a variety of housing opportunities. Seniors can be disabled or on limited incomes, and policies based on minimum age limits often help provide housing to those over certain age limits. Multi-family senior housing projects have different requirements and needs than do standard multi-family developments such as market-rate apartments, and as such, cities may need to address these types in their codes.

Only 13 persons noted that there were special standards for the development of senior housing, though at least one mentioned a restrictive policy such as allowing such development only by conditional use rather than by right. Nine respondents said that housing for senior citizens is distinguished from other multi-family residential uses; however, only one had a separate zoning district for senior residential facilities, and only two mentioned more lenient requirements for considerations such as parking.

### ***Group Housing Policies***

Housing for other special needs populations can include group homes or care facilities for homeless persons, those afflicted by substance abuse, HIV/AIDS survivors, youth in crisis, and victims of domestic violence. These groups often require group or temporary housing in

dedicated homes, often in residential areas. Federal fair housing law ensures that disabled persons and many other potential group home residents be allowed housing by right; this means group homes must be allowed in most residential areas.

The State of Ohio requires that group homes that meet certain criteria be allowed in residential zones; thus, any city with a more restrictive policy may be violating state law. State laws vary by type of group home; these are presented below.

Regarding residential facilities for the mentally ill, Ohio Revised Code, Title 51 Public Welfare, Chapter 5119: Department of Mental Health, part 22. Inspecting and licensing of residential facilities. allows the following:

*Any person may operate a residential facility providing accommodations and personal care services for one to five unrelated persons and licensed as a residential facility...as a permitted use in any residential district or zone, including any single-family residential district or zone of any political subdivision.*<sup>34</sup>

In addition, for group housing for persons with disabilities, Title 51, Chapter 5123: Department of Developmental Disabilities, part 19 Operation of residential facilities. states that:

*Any person may operate a licensed residential facility that provides room and board, personal care, habilitation services, and supervision in a family setting for at least six but not more than eight persons with mental retardation or a developmental disability as a permitted use in any residential district or zone, including any single-family residential district or zone, of any political subdivision.*<sup>35</sup>

Thus, Ohio law allows for many group homes of eight persons or fewer in residential zones across the State, regardless of local zoning. However, 40 respondents said that they did not define any regulations for such housing, and only 18t replied affirmatively. Some responses said that group homes were only allowed by conditional use permit, possibly excluding group homes from many zones.

## FAIR HOUSING POLICIES AND PRACTICES

At the local level, establishing a clear fair housing policy or ordinance can further ensure their commitment to AFFH; without a stated policy or code, fair housing issues may not be considered in other agency decisions, possibly impeding fair housing choice. A fair housing ordinance can simply define protected classes and discrimination, reinforce fair housing laws, and address rights and responsibilities in order to accomplish these goals.

Less than a quarter of those who answered the question, just 28 had a fair housing ordinance, policy, or regulation, and just 29 had policies or practices for “affirmatively furthering fair housing.” However, no AFFH policies or practices were noted; instead, a few responses mentioned that they have a fair housing ordinance or that they comply with federal requirements for funded projects, though were not sure what actions were done.

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<sup>34</sup> (Ohio Revised Code 2013)

<sup>35</sup> (Ohio Revised Code 2012)

These responses suggest that many of the staff who provided information on city and County policies lacked knowledge of the jurisdiction's fair housing plan, ordinance, resolution, or policy. In many cities, public sector recognition of responsibilities under the Fair Housing Act, and checking for compliance with federal standards for land use could increase fair housing access.

## C. LAND USE PLANNING INTERVIEWS

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In the Region's 22 entitlement cities and counties, public sector policies were evaluated through the Land Use Planning Interviews, which were conducted over the phone in November and December of 2012 with 29 planning, community development, building, and other staff. This method allowed the collection of thorough answers to key questions about public sector policies.

Local planning and community development staff provided details on many elements of their jurisdictions' policies. Interview questions related to zoning ordinances, planning policies, and land use practices identical to those addressed in the 2012–2013 Fair Housing Survey for Government Officials, presented previously.

### DEFINITIONS

#### *Dwelling Unit Definitions*

More than three-fourths of jurisdictions surveyed have definitions for "dwelling unit." Some definitions were not restrictive to any particular groups, and noted "household," "person," or other term for the occupants. However, a few examples definitions for "dwelling unit" may present barriers or impediments to housing choice for nontraditional households, by defining dwelling units for "families" only; these are presented below:

- ...a room or group of rooms located within a dwelling structure and forming a single habitable unit with living, sleeping, cooking, eating and sanitary facilities used or intended to be used by one (1) family.
- ...living, dining and sleeping rooms, storage closets and the space and equipment for cooking, bathing and toilet facilities, all used by one family. "Dwelling unit" does not include a tent, trailer or mobile home.
- ...an enclosed space within a building having a unique entrance and consisting of one (1) or more living and/or sleeping rooms arranged contiguously with cooking and sanitary facilities, which are not accessible from a common or public area, maintained or designed to be occupied by a single-family.

Some of these definitions are flexible for housing units of many types, including mobile homes and accessory dwellings, but others exclude structures some households may choose to inhabit. Most importantly, all three definitions may exclude some housing that may be required for persons of special needs, such as group homes, because only one family is permitted in a dwelling unit. In addition, they may exclude nontraditional families that do not fall under the jurisdiction's definition of "family."



## **Family Definitions**

More than 75 percent of those surveyed define “family” in their ordinances, and some of these definitions exclude households of non-related persons or more than a set number of residents.

While some of the “family” definitions do not restrict family and dwelling unit inhabitants by their characteristics and merely define a household, the following definitions apply in several entitlement communities in the Region and may not be in the spirit of AFFH. These restrict household size based on related/unrelated persons and numerical restriction on number of persons:

*...one or more persons occupying a single dwelling unit, provided that unless all members are related by blood, marriage, or adoption, no such family shall contain over five persons.*

One or more persons related by blood, marriage or adoption to live together in one residence unit and maintain a common household; or not more than two persons not related by blood, marriage or adoption who live together in one dwelling unit and maintain a common household. ...the following persons shall not be considered to cause a violation of this Ordinance: (a) Persons residing in a household who are the subject of pending adoption proceedings. (b) Persons residing in a household due to placement by federal, state or local agencies or regulations. (c) Foreign exchange students temporarily residing in a household pursuant to a recognized exchange program... (d) A caregiver who is required to reside in a household for the primary purpose of providing medical or health related care to an occupant of the household.

*...one individual or a number of individuals related by blood, adoption or marriage to the head of the household or to the spouse of the head of the household living, sleeping, cooking and eating together as a single housekeeping unit in a single dwelling unit, except that a family may include not more than two additional persons not related...to the head of the household or to the spouse of the head of the household. ...*

Some noted definitions do not allow for families of any size made up of related or unrelated persons, and so prevent a large nontraditional family or group of unrelated persons from living together. In addition, some definitions exempted group homes or boarding houses; if these homes are not defined and allowed elsewhere in the code, special needs persons and other potential group home residents may experience disparate impact or intentional discrimination.

## **Occupancy Standards**

Additionally, a few cities impose limits on the number of persons allowed in each dwelling unit, such as per bedroom or according to square footage. Other jurisdictions had policies imposing limits on number of unrelated. These, too, could be impediments. Communities with definitions that may exclude selected persons may not be in the spirit of AFFH.

## AFFORDABLE HOUSING DEVELOPMENT

About one-quarter of cities reported guidelines that encourage the development of affordable housing units, such as zoning districts that allow for smaller lots or a variety of nontraditional housing styles. However, several cities used HOME, CDBG, or other federal funding for affordable housing projects, and many respondents noted that there is no shortage of affordable housing supply in their communities.

While the majority of cities did not cite any barriers to affordable housing, in some places some barriers were listed. Lack of funding for subsidized housing, restrictive zoning for smaller or multi-family homes, and neighborhood resistance, or NIMBYism, were mentioned. Communities that allow this resistance to sway their decisions about development applications may be in violation of the Fair Housing Act.<sup>36</sup>

## MIXED-USE HOUSING DEVELOPMENT

Nearly all of the jurisdictions contacted in the phone survey allow mixed-use development housing. A few cities provide policy incentives to encourage mixed-use development. However, more than half of respondents indicated that barriers to mixed-use housing development exist, ranging from environmental to policy-related, such as height restrictions. Often these factors are in place to improve communities, such as height or setback regulations that allow sun access or improve aesthetics; however, they can have negative implications on other housing goals. Notably, several communities replied that the codes heavily restricted multi-family housing of all kinds, including mixed-use as well as apartment housing. Such restrictions could limit housing choice for some groups.

## SPECIAL NEEDS HOUSING

### *Accessible Housing Policies*

Less than half of communities define “disability” in their policies, and close to a third of respondents did not know if their jurisdictions had such a definition. Almost no cities have specific standards for the construction of accessible multi-family housing other than building codes, and very few have clear policies for persons with disabilities to request reasonable accommodations or modifications to city policies if necessary for accessible housing. However, some communities noted that the age of the housing stock was a barrier for the conversion of housing to accessible standards, and few cases of careful monitoring and compliance of accessible housing were noted.

### *Senior Housing Policies*

Nearly three-quarters of communities interviewed did not have any special standards to address senior housing. In a few, incentives such as lower parking requirements for senior housing are offered, and some noted recent funding for senior complexes. In the one city with a special zoning district for multi-family senior housing, the age limit for residents is 55 but will soon be

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<sup>36</sup> (DOJ and HUD 1999)

changed to 62, due to community resistance against partying by younger residents. If the city allows this change based solely on NIMBYism, the decision could be against the spirit of AFFH.

### ***Group Housing Policies***

As discussed previously, the State of Ohio requires that most types of group homes with eight persons or fewer be allowed in residential zones, regardless of local zoning; thus, any city with a more restrictive policy may be violating state law. However, some jurisdictions interviewed noted more restrictive policies such as excluding all group homes from residential zones. Some cities said that group homes of up to a certain size were allowed; above that size, they required conditional use permits or variances.

Also important for fair housing choice is the availability and location of housing for persons with special needs. According to HUD and the U.S. Department of Justice (DOJ), the Fair Housing Act states that local jurisdictions cannot impose density restrictions on group homes: it is unlawful for a city to disallow group homes to be located within a particular distance of each other.<sup>37</sup> Despite these regulations, several cities in the Region had group home density restrictions, such as prohibiting “excessive concentration” or limiting group homes to only one per block face or within 1,000 or 2,000 feet of each other. These policies may not be in the spirit of AFFH.

## **FAIR HOUSING POLICIES AND PRACTICES**

More than three-quarters of the jurisdictions interviewed had a fair housing ordinance, policy, or regulation, and nearly three-quarters had policies or practices for “affirmatively furthering fair housing.” Examples of the policies and practices seen in a few cities include:

- Referring complaints to the local fair housing agency;
- Defining additional protected classes; and
- Supporting a city fair housing commission or board.

However, several staff who provided information on city and county policies lacked knowledge of their jurisdictions’ fair housing plans, ordinances, resolutions, or policies. In many cities, public sector recognition of responsibilities under the Fair Housing Act, and checking for compliance with state and federal standards for land use, could increase the fairness of housing access.

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<sup>37</sup> (DOJ and HUD 1999)

## D. REGIONAL VARIATIONS IN LAND USE POLICIES

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Findings from respondents in each of the regional planning organizations are presented in **Volume III** of this Regional AI, and are summarized below.

### 1. NOACA REGION

Results of the 2012–2013 Fair Housing Survey for Government Officials, conducted among nonentitlement planning staff, and the Land Use Planning Interviews, conducted over the phone with entitlement community staff, are presented in full in **Volume III, Chapter 2. H** for the NOACA region.

#### *Definitions*

Of those who answered the question from the NOACA region, nearly all had definitions for “dwelling unit.” A possible issue was found in Parma, where the definition of “dwelling unit” does not include a tent, trailer, or mobile home. While 19 respondents to both surveys reported having a definition of “family,” in several cases these definitions could be exclusionary, such as in Cleveland, East Cleveland, Euclid, and Mentor. All of these definitions distinguish between related/unrelated persons and/or impose numerical limitations on family size, possibly not in the spirit of AFFH. When asked if the jurisdiction had any residential occupancy standards or limits outside of standard building codes, nine respondents replied that they did.

#### *Affordable Housing*

Regarding affordable housing development, only nine respondents in the NOACA region replied that they had special policies encouraging this, with several entitlement cities noting HOME and CDBG funding requirements that provide housing for low- to moderate-income households as part of community development efforts. In Cleveland, for example, the Community Development department operates tax abatement, land abatement, rehab, and other programs. The planning department allows for small lot subdivisions, even in single-family zones, and has created special zones for townhomes and other smaller, more affordable units.

Only four respondents reported barriers to affordable housing development, and 18 replied that there were none. Rather, some respondents said there were abundant affordable housing opportunities, through low-cost land and a slow real estate market. In East Cleveland, for example, housing costs are so low that the City hopes to gentrify some areas and reinvest to raise property values. In some cases affordable housing may also be of lower quality, particularly among rental housing; for example, in Parma there is no home inspection program, so some landlords may not renovate the interiors of aging homes. In Cleveland, barriers may exist in some areas to balance quality with affordability such as in neighborhoods with older, former small apartment homes.



### ***Mixed-Use Housing***

Many cities in the NOACA region allow mixed-use housing, with 17 respondents to the survey and interviews noting this. Another nine respondents said they do not allow mixed-use housing development. Some communities had special districts where this type of development is allowed, such as Mentor where a planned unit development district allows a variety of uses, and in several communities, such as Lakewood, many neighborhoods include a mix of historic buildings and homes mixed together. In the Cleveland zoning codes, housing is allowed in residential as well as retail or light industrial zones, thus including mixed-use housing.

### ***Special Needs Housing***

Only seven respondents from the NOACA region defined the term “disability” in their codes, and 16 did not. Among the entitlement cities, no definition of “disability” was reported by respondents from Euclid, Elyria, Lakewood, and Parma. Only seven respondents noted development standards that make housing accessible to the disabled, with 13 responding negatively. In a few communities, respondents noted policies outside standard ADA codes, such as inclusionary requirements for multi-family projects. However, several barriers were mentioned for providing accessible housing: lack of building inspectors for housing and older construction as well as the age of the housing stock can result in a smaller supply of accessible units. In East Cleveland, much of the more than 100-year-old housing stock is not at all accessible for persons with physical disabilities, and additional housing may need to be demolished, and the City hopes to find more funding for housing demolition to remove vacant units from neighborhoods.

Only eight respondents noted having special policies regarding senior housing, and 13 said that they distinguish senior housing from other residential uses in their codes, such as through more lenient parking requirements.

In several communities in the NOACA region, policies that may not be in the spirit of AFFH were found regarding group homes. In the survey and interviews, 12 respondents said that they had guidelines providing for such housing, but several cities did not. Among them, Cleveland codes do not define group housing for people with disabilities or other special needs populations, although group homes and boarding houses are not allowed in single-family districts according to the code. Some possibly overly restrictive policies regarding group home concentration were seen in Lakewood, where adult group homes cannot be within 1,000 feet of each other, and Mentor, where a code chapter states that “excessive concentration...” of group homes “...shall be avoided,” though it does not define such concentration.

### ***Fair Housing Policies and Practices***

In the NOACA region, 16 respondents said their cities have a fair housing ordinance, policy, or regulation; many of these were available in the online codes. In Cleveland, the City’s fair housing ordinance adds several additional protected classes, as mentioned previously.

When asked about their policies or practices for AFFH, 14 respondents said that these existed, and examples included referring complaints to the local fair housing agency, supporting a fair

housing board, and contracting with local nonprofits to conduct audits and other reviews of potential fair housing issues.

## **2. NEFCO REGION**

Results of the 2012–2013 Fair Housing Survey for Government Officials, conducted among nonentitlement planning staff, and the Land Use Planning Interviews, conducted over the phone with entitlement community staff, are presented in full in **Volume III, Chapter 3. H** for the NEFCO region.

### ***Definitions***

In the NEFCO region, 15 respondents reported definitions for “dwelling unit.” Possible issues for fair housing choice were seen in Barberton, where the definition of “dwelling unit” imposes numerical limitations, and in several other cities where the unit was defined as available for one “family,” where that definition was also possibly exclusionary. The “family” definition in Cuyahoga Falls distinguishes between related and unrelated persons and imposes numerical limitations, and some confusion was noted in the City of Kent’s codes relating to this definition: the code refers to “family” but does not define it, instead defining “household.” Changes were made to Kent’s codes following a 2009 Analysis of Impediments to Fair Housing Choice study, so the City’s codes may be more in the spirit of AFFH now, despite the confusing language.

### ***Affordable Housing***

Only four respondents in the NEFCO region reported having policies encouraging affordable housing, and six noted possible barriers to affordable housing. Few barriers such as NIMBYism were mentioned, and in Kent, for example, several affordable housing developments have been built in recent years with no resistance.

### ***Mixed-Use Housing***

Twelve respondents from the NEFCO region allow mixed-use housing and six do not, with some respondents stating that some mixed-use development was allowed in certain areas such as the downtown or central business district. In some cases, this use was only allowed by conditional use permit.

### ***Special Needs Housing***

Only six respondents from the NEFCO region defined the term “disability” in their codes; the entitlement cities of Alliance and Cuyahoga Falls were among these. Only one respondent reported special policies or standards to make housing accessible to persons with disabilities.

When asked about any special process for persons with disabilities who need variances for accessible housing, eight respondents replied that such a process existed. Examples included an administrative permit request process to the City of Kent, where the permit fee for an accessibility ramp or other adjustments for owner-occupied housing is waived. Also of note: in

Alliance there is no special process for disabled residents, but the City often receives calls about ADA compliance assistance.

Only two respondents noted having special policies regarding senior housing, and 12 had none. Similarly, only two respondents said that they distinguish senior housing from other residential uses in their codes, and many did not know or did not answer the question.

Policies about group homes and housing for special needs populations were reported by only six respondents from the NEFCO region, though in some communities these may be overly restrictive. In Barberton, for example, the group home definition is more restrictive than that cited in the federal Fair Housing Act and Ohio Revised Codes, and states that homes of up to 4 persons may be allowed without a special permit (as opposed to the 6 to 8 allowed in the federal and state codes). Potentially prohibitive group home density restrictions were seen in Kent, which allows "...no more than one family care home or group home per block face for the purpose of avoiding excessive concentration of such homes."

### ***Fair Housing Policies and Practices***

Only five respondents in the NEFCO region said their cities have a fair housing ordinance, policy, or regulation, compared to seven who did not. When asked about their policies or practices for AFFH, eight respondents said that these existed; for example, in Cuyahoga Falls, the City contracts with a consultant who conducts training, handles housing complaints, and wrote the City's most recent AI.

## **3. EASTGATE REGION**

Results of the 2012–2013 Fair Housing Survey for Government Officials, conducted among nonentitlement planning staff, and the Land Use Planning Interviews, conducted over the phone with entitlement community staff, are presented in full in **Volume III, Chapter 4.H** for the Eastgate region.

### ***Definitions***

Of respondents from the Eastgate region, 22 said their communities had definitions for "dwelling unit," though an addition 12 did not know. The entitlement city of Warren, however, had no definition of "dwelling unit," though did define "dwelling." In Youngstown, also an entitlement city, the definition did not exclude non-families: "A building or portion thereof providing complete living facilities for a single housekeeping unit."

Notably, while 13 respondents from the Eastgate region replied that their communities did have a definition for "family," another 13 did not know and 17 replied that they did not. Both entitlement cities had "family" definitions, and neither included discriminatory language for non-related families. Nine respondents replied that their communities had occupancy standards or limits, such as per square footage, although some of these related to international property codes for health and safety rather than potentially disparately applied policies.

## ***Affordable Housing***

Regarding affordable housing development, only five respondents in the Eastgate region replied that they had special policies encouraging this. Neither of the entitlement cities of Warren or Youngstown replied affirmatively to this question, although both noted that they often have CDBG or HOME funding available for housing for low- to moderate-income households. Across the Eastgate region, 15 respondents said there were barriers to providing affordable housing and 22 said that there were not. None of the respondents from the entitlement cities noted barriers to affordable housing; rather, in Youngstown, neighborhood resistance to market-rate housing was noted, based on environmental and traffic factors. Several affordable and supportive housing projects have been constructed in recent years.

## ***Mixed-Use Housing***

Many cities in the Eastgate region allow mixed-use housing, with 18 respondents to the survey and interviews noting this and 11 replying negatively. In both entitlement cities, mixed-use housing is allowed in all districts or all multi-family residential zones, or through a planned unit development process.

## ***Special Needs Housing***

Only four respondents from the Eastgate region defined the term “disability” or “handicap” in their codes, while 20 did not and 13 did not know. However, in both entitlement cities, the definition was as broadly inclusive as the State of Ohio definition, representing persons who have either a physical or mental impairment; have a record of such an impairment; or are regarded as having such an impairment (excluding persons with current illegal drug use). Only eight respondents noted having special standards or policies regarding the construction of accessible housing, while twice as many replied that they did not. Neither of the entitlement cities had such standards, including monitoring or compliance. Similarly, only eight respondents had a special process for persons with disabilities who need to request a reasonable accommodation variance, and neither entitlement cities had such a process with administrative, fast approval.

While just five respondents said they had special standards for the construction of senior housing while 21 did not, even fewer (three) distinguished senior housing from other multi-family residential uses, such as through reduced parking requirements or density restrictions, while 22 did not. In Warren, however, an entire zoning district is dedicated to making housing for seniors comfortable and relatively easy to develop.

When asked about housing for other special needs populations, only four respondents from the Eastgate region said they had guidelines for such housing, and 20 said they did not. Even of the cities who provide for group housing, some policies could be seen as not be in the spirit of AFFH. In Youngstown, for example, adult group homes cannot be located within 2,000 feet or less of one another without a public hearing.<sup>38</sup> This policy may adversely affect some protected class populations who require group housing, and may be contradict HUD and DOJ policy that disallows cities to restrict the relative location of group homes according to a particular

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<sup>38</sup> Codified Ordinances of the City of Youngstown, Part 17 – Health Code, Chapter 1744 Group Homes, part 1744.02 License Required.



distance.<sup>39</sup> While the Youngstown policy can be waived through a hearing, the hearing could present another potential issue: cities that allow neighborhood resistance against housing for a protected class to sway their decisions may be in violation of the Fair Housing Act.<sup>40</sup> In the Eastgate region's other entitlement city of Warren, group homes are not allowed in all residential zones, despite the Ohio Revised Code provision ensuring this.

### ***Fair Housing Policies and Practices***

Only seven respondents from the Eastgate region reported having a fair housing policy, ordinance, or regulation or practices for AFFH, in comparison to 15 who did not for both questions. Both entitlement cities did provide for AFFH in their communities, including handling complaints and conducting outreach and education with housing industry professionals.

## **E. FAIR HOUSING SURVEY – PUBLIC SECTOR RESULTS**

As mentioned previously, further evaluation of the status of fair housing within the NEOSCC Region was conducted via the 2012–2013 Fair Housing Survey for Housing Stakeholders, which was completed online by 183 stakeholders and citizens. Those solicited for participation included a wide variety of individuals from the fair housing arena. Most questions in the survey required “yes,” “no,” or “don’t know” responses, and many allowed the respondent to offer written comments. While the numerical tallies of results are presented in this section, along with summaries of some comment-heavy questions, a complete list of written responses is available in **Volume III for each area**. Other survey results are also discussed previously.

### **FAIR HOUSING IN THE PUBLIC SECTOR**

Public sector effects on housing can be complex and varied. The questions in this section of the survey asked respondents to think about possible barriers to fair housing choice within very specific areas of the public sector, as follows:

- Land use policies,
- Zoning laws,
- Occupancy standards or health and safety codes,
- Property tax policies,
- Permitting processes,
- Housing construction standards,
- Neighborhood or community development policies,
- Access to government services, and
- Any other public administrative actions or regulations.

If respondents indicated affirmatively that they were aware of possible discriminatory issues in any of these areas, they were asked to further describe issues in a narrative fashion. Tallies for each question are presented in Table V.2 and complete sets of narrative comments are

<sup>39</sup> (DOJ and HUD 1999) Group Homes, Local Land Use, and the Fair Housing Act

<sup>40</sup> (DOJ and HUD 1999) Group Homes, Local Land Use, and the Fair Housing Act

included in **Volume III** for each area. Narrative responses and practices noted by high numbers of respondents suggest that the issues raised are potential impediments to fair housing choice in parts of the Region.

**Table V.1**  
**Barriers to Fair Housing in the Public Sector**  
 NEOSCC Region  
 2012–2013 Fair Housing Survey for Housing Stakeholders Data

Question	Yes	No	Don't Know	Missing	Total
<b>Are you aware of any questionable practices or barriers to fair housing choice in:</b>					
Land use policies?	19	65	31	68	183
Zoning laws?	22	52	39	70	183
Occupancy standards or health and safety codes?	15	55	45	68	183
Property tax policies?	11	55	50	67	183
Permitting process?	8	51	56	68	183
Housing construction standards?	9	54	52	68	183
Neighborhood or community development policies?	16	56	44	67	183
Limited access to government services, such as employment services?	31	61	22	69	183
Public administrative actions or regulations?	9	52	53	69	183

### ***Land Use Policies***

When asked, 19 respondents noted that they were aware of barriers to fair housing choice related to land use policies. As indicated previously, respondents were also asked to discuss questionable practices or barriers specifically in narrative format. None of the narrative comments received in relation to this question explicitly pointed to barriers to fair housing choice based on protected class protections; however, existence of policies that exclude multi-family housing was commonly cited.

### ***Zoning Laws***

Zoning laws were also investigated as part of the survey. As many as 22 respondents noted awareness of barriers to fair housing choice due to zoning laws. Narrative comments received in relation to this question also pointed to restriction of multi-family housing, although some comments particular noted barriers to fair housing choice:

- Group homes are not allowed or are only allowed conditionally or after a longer process than for single-family homes,
- Restrictive definitions of “family,” and
- Only large single-family homes are allowed in zoning laws.

### ***Occupancy Standards or Health and Safety Codes***

Across the Region, 15 persons noted awareness of fair housing issues caused by occupancy standards or health and safety codes, and while no comments received were related to fair housing law violations, several respondents replied that code are not enforced, particularly in some suburbs and other low-income areas.

### ***Property Assessment and Tax Policies***

When asked about barriers to fair housing choice in property tax policies, 11 respondents were aware of such issues. No comments were strictly related to fair housing access impediments, although some respondents did reply that tax incentives would be helpful in providing accessible housing for persons with disabilities and for home improvement programs.

### ***Permitting Processes***

The survey also addressed perceptions of the local permitting process. Only 8 respondents noted limited access to these services as a problem in the NEOSCC Region; a few comments received noted that forms and information about permitting are only offered in English.

### ***Housing Construction Standards***

Barriers to fair housing choice in housing construction standards were also addressed in the survey. Fair housing concerns in this area were reported by 9 respondents. No comments received cited impediments for particular protected groups, although some respondents reported lack of enforcement and lack of knowledge on the part of building departments and permit officials.

### ***Neighborhood or Community Development Policies***

Only 16 respondents noted awareness of barriers to fair housing choice in neighborhood or community development policies. Most of the comments received addressed policies limiting low-income housing, and several reported that their communities did not focus development efforts in areas that needed attention. A few comments said that the lowest-income areas were also those with high protected class populations, and these areas received very little in community development resources.

### ***Limited Access to Government Services***

The survey was also used to examine awareness of situations wherein groups faced limited access to government services, including public transportation and employment services. Many respondents, 31, noted limited access to these services as a problem in NEOSCC Region. Almost all of these comments noted lack of public transit, particularly affecting those in need of government services, including disabled persons. Some comments said that the lack of service had a disparate impact on populations of minority race and ethnicity.

### ***Any Other Public Administrative Actions or Regulations***

Respondents were also asked to discuss their awareness of barriers to fair housing in any other public administrative actions or regulations. When asked, 9 respondents noted awareness of other issues, and comments included other limitations on rental housing, group homes, and smaller homes.

## F. SUMMARY

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The status of affirmatively furthering fair housing (AFFH) within the NEOSCC Region's public sector was evaluated through review of selected public services, local policies, and practices; and the results of the public sector section of the Fair Housing Survey.

Evaluation of the distribution of housing vouchers, HUD-assisted rental properties, and other affordable housing in the Region demonstrated that these assisted housing options were relatively widely distributed, and tended to be concentrated in areas other than those with the highest poverty rates.

The 2012–2013 Fair Housing Survey for Government Officials, conducted online with many of the Region's nonentitlement cities and counties, showed that many of these jurisdictions have in place some basic housing definitions such as "dwelling unit" and "family," but most tend to be restrictive and may not be in the spirit of AFFH. Very few communities define "disability" in their codes or have policies in place to offer options for persons in need of modifications to policies for reasonable accommodation. Housing for seniors and group housing are not consistently addressed in local codes, despite being accommodated in State codes. Most communities lack fair housing ordinances or practices. Across the array of communities contacted, a wide variety of policies and practices exist, several of which are not in the spirit of AFFH and may unwittingly discriminate against several groups. A more complete, consistent, and uniform approach could greatly benefit these communities in the Region.

Results of the Land Use Planning Interviews, conducted with the 22 entitlement cities and counties in the NEOSCC Region, revealed many similar issues among these communities. Some definitions of "dwelling unit" and "family" restricted housing to related families of a certain size or type, and some restricted group housing by zone despite State protections. Very few considerations were found for accessible housing or senior housing, and some policies restricting the concentration of group homes were found. Some cities may need to update their policies and codes in order to reflect the spirit of AFFH.

Some variations in local land use policies were seen within the NEOSCC Region. Within the NOACA metro area in particular, several potentially discriminatory definitions of "family" were seen, as well as several entitlement cities with no definition for "disability." In addition, multiple group home density restrictions were seen; these may not be in the spirit of AFFH. In the NEFCO area, a few "family" or "dwelling unit" definition concerns were found, as well as some cities with no definition of "disability" and two cities with possibly restrictive group home policies. In the Eastgate metro area, many communities lacked policies or provisions for providing housing for particular groups, although few potential impediments were found. However, lack of provision for group homes and group home density restrictions were seen.

Results from the public sector section of the 2012–2013 Fair Housing Survey for Housing Stakeholders revealed that some respondents in the NEOSCC Region believe there are problematic practices or policies within the public sector. Of those that did, some noted land use policies and zoning laws that particularly impact protected class populations by limiting the location of group homes and other multi-family housing, and some respondents suggested that public transit services are lacking.



## VI. PUBLIC INVOLVEMENT

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This section discusses analysis of fair housing in the NEOSCC Region as gathered from various public involvement efforts conducted as part of the Regional AI process. Public involvement feedback is a valuable source of qualitative data about impediments, but, as with any data source, citizen comments alone do not necessarily indicate the existence of countywide impediments to fair housing choice. However, survey and forum comments that support findings from other parts of the analysis can more solidly identify impediments to fair housing choice.

### A. FAIR HOUSING SURVEY

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As discussed in previous sections, a 2012–2013 Fair Housing Survey for Housing Stakeholders comprised a large portion of the public involvement efforts associated with the development of the 2013 Regional AI. While data from the survey regarding policies and practices within the private and public sectors have already been discussed, the remaining survey findings are presented in the following narrative.

The purpose of the 2012–2013 Fair Housing Survey for Housing Stakeholders, a relatively qualitative component of the Regional AI, was to gather insight into knowledge, experiences, opinions, and feelings of stakeholders and interested citizens regarding fair housing as well as to gauge the ability of informed and interested parties to understand and affirmatively further fair housing. Many organizations throughout the Region were solicited to participate.

Across the NEOSCC Region, 183 respondents completed the survey, which was conducted entirely online. Individuals solicited for participation included representatives of housing groups, minority organizations, disability resource groups, real estate and property management associations, banking entities, fair housing advocates, and other groups involved in the fair housing arena. Other survey results are also discussed in **Sections IV** and **V**. Narrative responses and practices noted by high numbers of respondents suggest that the issues raised are impediments to fair housing choice.

Respondents of the 2012–2013 Fair Housing Survey for Housing Stakeholders were asked to identify their primary role within the housing industry. As shown in Table VI.1, of the 165 responses from the Region, 53 respondents identified themselves as advocates or service providers, 29 were representatives of local government, 26 were in real estate, 14 were in construction or housing development, and 11 were property managers.

**Table VI.1**  
**Primary Role of Respondent**  
 NEOSCC Region  
 2012–2013 Fair Housing Survey for Housing  
 Stakeholders Data

Primary Role	Total
Advocate/Service Provider	53
Banking/Finance	2
Condo or Homeowner Association Leader	5
Construction/Development	14
Insurance	1
Law/Legal Services	5
Local Government	29
Property Management	11
Real Estate	26
Resident Advisory Council Leader	5
Other Role	32
<b>Total</b>	<b>183</b>

The next question asked respondents about their familiarity with fair housing laws. Results of this question are presented in Table VI.2. As shown, slightly more than half of all respondents indicated that they were somewhat familiar (53 respondents) or very familiar (67 respondents) with fair housing law, and 13 respondents said that they were unfamiliar.

**Table VI.2**  
**Familiarity with Fair  
 Housing Laws**

NEOSCC Region  
 2012–2013 Fair Housing Survey  
 for Housing Stakeholders Data

Familiarity	Total
Not Familiar	13
Somewhat Familiar	53
Very Familiar	67
Missing	50
<b>Total</b>	<b>183</b>

Table VI.3 shows the responses to a number of questions regarding federal, state, and local fair housing laws. First, respondents were asked to indicate their perceptions of the usefulness of fair housing laws in their communities. As shown, 118 respondents indicated that fair housing laws are useful, and only 13 respondents believed that fair housing laws are not useful.

Respondents were also asked if fair housing laws are difficult to understand or follow. As shown, 40 respondents said that fair housing laws are difficult to understand or follow, which represents about a third of respondents who answered this question and indicates that additional education and outreach about fair housing law may be useful.

The third question of this section inquired if fair housing laws should be changed; 29 respondents indicated affirmatively, and written responses suggested the following:

- Adding sexual orientation as a protected class;
- Adding protections for other groups, such low-income persons; and
- Offering more rights and protections for property owners and landlords.

When asked if fair housing laws are adequately enforced, 93 respondents replied that they are and 27 said that they are not.

**Table VI.3**  
**Perceptions About Fair Housing Laws**

NEOSCC Region  
2012–2013 Fair Housing Survey for Housing Stakeholders Data

Question	Yes	No	Don't Know	Missing	Total
Do you think fair housing laws are useful?	118	13	4	48	183
Are fair housing laws difficult to understand or follow?	40	73	19	51	183
Do you think fair housing laws should be changed?	29	59	43	52	183
Do you thing fair housing laws are adequately enforced?	93	27	8	55	183

The next section in the survey related to fair housing activities, including outreach and education and testing and enforcement. As shown in Table VI.4, when asked if there was a training process available to learn about fair housing laws, 93 respondents indicated affirmatively, and 86 respondents noted that they had participated in fair housing training; the latter group represented more than two-thirds of those who responded to the survey. Respondents were also asked about their awareness of fair housing testing; only 53 respondents were aware of such activity compared to 48 who were not and another 27 who did not know.

Questions in this section also invited respondents to gauge the current levels of fair housing testing and education in their communities. Nearly half of all respondents who answered the question, 50 persons, suggested that there is too little fair housing outreach and education activity in the Region, and 34 respondents said that outreach and education activities are sufficient, with only 6 indicating that there is too much. In terms of fair housing testing, 26 of the respondents who answered indicated that there is too little testing; however, many respondents, 83, did not appear to understand fair housing testing activities because they said they did not know.

**Table VI.4**  
**Fair Housing Activities**

NEOSCC Region  
2012–2013 Fair Housing Survey for Housing Stakeholders Data

2012–2013 Fair Housing Survey for Housing Stakeholders Data							
Question		Yes	No	Don't Know	Missing	Total	
Is there a training process available to learn about fair housing laws?		93	27	8	55	183	
Have you participated in fair housing training?		86	13	2	82	183	
Are you aware of any fair housing testing?		53	48	27	55	183	
Testing and education		Too Little	Right Amount	Too Much	Don't Know	Missing	Total
Is there sufficient outreach and education activity?		50	34	6	36	57	183
Is there sufficient testing?		26	15	4	83	55	183

As part of the process of measuring understanding of fair housing law through the survey instrument, respondents were asked to list their awareness of classes of persons protected by fair housing laws on federal, state, and local levels. Race and disability were offered as examples of protected classes in the question narrative, encouraging respondents to list other protected classes. Results of this question are presented in Table VI.5. Some respondents were able to correctly identify several of the protected classes, including religion, familial status, sex, national origin, and color. Of the respondents, between 69 and 36, in descending order, identified these groups. However, many respondents indicated some confusion as to protected classes when several listed sexual orientation and age for fair housing protection; these class distinctions have no such protection in federal or local law. In addition, research presented in the literature review section of this document suggests that, nationally, many persons are not able to correctly list classes of persons protected by fair housing law in their community; this generalization may be accurate in the NEOSCC Region as well.

**Table VI.5**  
**Protected Classes**  
NEOSCC Region  
2012–2013 Fair Housing  
Survey for Housing  
Stakeholders Data

Protected Class	Total
Family Status	69
Religion	60
Gender	57
National Origin	43
Color	36
Sexual Orientation	28
Age	29
Military	28
Disability	12
Ancestry	15
Ethnicity	8
Race	6
Other	40
<b>Total</b>	<b>433</b>

Respondents were also asked to indicate their awareness of where to refer persons who wish to file a fair housing complaint. While 24 respondents suggested HUD, and a good 15 to 17 respondents suggested other regional or state complaint agencies, a wide range of less appropriate venues were also suggested, such as a State agency, a tenants' organization, , or their city or county. These results suggest that, though many respondents indicated they were familiar with fair housing law, far fewer are aware of where to refer a person with a housing complaint. Responses are presented in Table VI.6.



**Table VI.6**  
**Fair Housing Violation Referrals**

NEOSCC Region  
 2012–2013 Fair Housing Survey for Housing Stakeholders Data

Referral	Total
ACLU	2
Ashtabula County Fair Housing Office	1
Board of Realtors	1
City	6
City of Canton Fair Housing	2
Cleveland Fair Housing Board	4
Cleveland Tenants Organization	6
County	4
Don't Know	5
Fair Housing Advocates Association	7
Fair Housing Contact Service	17
Fair Housing Resource Center	3
Greater Warren-Youngstown Urban League	3
Heights Community Congress	2
Housing Advocates, Inc.	2
Housing Research and Advocacy Center	2
HUD	24
Lawyer	4
Legal Aid	8
Medina County Fair Housing	2
OCRC	15
Ohio Division of Real Estate and Professional Licensing	2
Other	10
Stark County Fair Housing Department	2
Would not refer	2
Youngstown Human Relations Commission	6
<b>Total</b>	<b>142</b>

Table VI.7 presents tallied responses to survey questions related to the status of fair housing in the NEOSCC Region. First, respondents were asked if they were aware of a fair housing plan in their communities. Several respondents, 55, indicated affirmatively, but another 41 said that they were not aware of such a plan. These findings suggest that many local jurisdictions in the Region may not address fair housing choice in their policies.

Respondents were also asked to offer information regarding any specific geographic areas within the Region that might have increased fair housing issues. While a number of respondents elected not to answer the question or indicated that they did not know, 19 respondents reported that certain geographic areas of the Region had fair housing issues. Fair housing-specific comments indicated that some inner-city areas and some suburbs have particular issues.

The survey also asked if there were any specific groups that face more housing discrimination than others. While 30 said no, another 32 said yes. Most commonly listed in the narrative comments were disabled persons and racial and ethnic minorities.

**Table VI.7**  
**Local Fair Housing**

NEOSCC Region  
2012–2013 Fair Housing Survey for Housing Stakeholders Data

Question	Yes	No	Don't Know	Missing	Total
Are you aware of any city or county fair housing ordinance, regulation, or plan?	55	41	17	70	183
Are there any specific geographic areas that have fair housing problems?	19	37	55	72	183
Are there any specific groups in that face housing discrimination?	32	30	49	72	183

Any one of the responses presented in the previous pages on their own may not necessarily be considered an impediment to fair housing choice, but the high number of “don’t know” or missing responses may be due to a lack of fair housing knowledge among public sector stakeholders. This is more likely an indicator that fair housing outreach and education efforts were insufficient or ineffective, which could represent a persistent impediment to fair housing choice.

## B. FAIR HOUSING FORUMS

Public input opportunities, through 13 fair housing forums, were held in all 12 counties during the week of March 11 of 2013. The purpose of the forums was to allow the public, stakeholders, and interested parties the chance to learn more about the Regional AI process, including why the Regional AI was conducted, as well as view the preliminary findings. Public involvement was also solicited at the forums, and comments were collected from the attendees. At all the forums combined, approximately 285 citizens of the NEOSCC Region attended. Guests at the forums included housing advocates, representatives of local service agencies, real estate agents, property owners, and others. In general, several commentators from units of local government seemed to lack sufficient knowledge of the duty to affirmatively further fair housing. Furthermore, discussions and comments at the forums focused on several issues, largely relating to the rental markets. In particular, the following issues were mentioned:

- Predatory lending based on race and ethnicity,
- Racial and ethnic disparities in concentrated communities,
- Vacant housing in some areas,
- Transportation to jobs from impoverished neighborhoods,
- Lack of education for homebuyers and renters, and
- Steering to particular neighborhoods over others.

## C. FORMAL FAIR HOUSING PRESENTATIONS

The week of June 17, 2013, 11 formal presentations of the findings of the Regional AI were held across the Region. These presentations offered the public another chance to comment on the findings. At all presentations combined, there were 70 attendees.

## D. SUMMARY

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Public involvement opportunities were an intrinsic part of the development of this Regional AI. Activities included the 2012–2013 Fair Housing Survey for Housing Stakeholders to evaluate current fair housing efforts and the 13 fair housing forums wherein citizens were offered the chance to comment on initial findings of the Regional AI and offer feedback on prospective impediments. Also held were 11 formal fair housing presentations.

Results of the 2012–2013 Fair Housing Survey for Housing Stakeholders showed that the majority of respondents felt that fair housing laws are useful, whereas some respondents were not familiar with fair housing law. Of the respondents who answered the question, many noted the need for increased fair housing education and outreach activities, and a moderate need was indicated for increased fair housing testing activities.

The 13 public forums held across the Region in March of 2013 allowed citizens and agencies to voice concerns about barriers to fair housing choice. Comments received at these forums focused on lack of transportation options for some populations as well as predatory lending, primarily toward racial and ethnic minorities.





## **VII. SUMMARY OF FINDINGS**

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### **A. SOCIO-ECONOMIC CONTEXT**

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Analysis of demographic, economic, and housing data provides information about the level and results of past locational choices. As observed, the same areas in the region contain several problematic concerns. This includes over concentrations of racial and ethnic minorities, high rates of poverty, notable racially and ethnically concentrated areas of poverty, and often areas that lack good transportation connections between areas of low-income and employment opportunities. Furthermore, the spatial distribution of areas lacking opportunity tended to correlate highly with the above-listed areas.

### **B. FAIR HOUSING ENVIRONMENT**

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The Region comprises 12 counties, containing the geographic areas of the Northeast Ohio Areawide Coordinating Agency (NOACA) including Cuyahoga, Lake, Lorain, Medina and Geauga, the Northeast Ohio Four County Regional Planning and Development Organization (NEFCO), including Portage, Stark, Summit and Wayne , and the Eastgate Regional Council of Governments (Eastgate) including the counties of Ashtabula, Mahoning and Trumbull.

A review of the fair housing profile in the NEOSCC Region revealed that several organizations provide fair housing services on the federal, state, and local levels. They all provide outreach and education, complaint intake, and testing and enforcement activities for both providers and consumers of housing. Examples include HUD; the Ohio Civil Rights Commission; the Fair Housing Contact Service Housing Advocates, Inc.; the Housing Research and Advocacy Center; and the Fair Housing Resource Center, Inc.

### **C. BARRIERS TO HOUSING CHOICE IN THE PRIVATE SECTOR**

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Evaluation of the private housing sector included review of home mortgage loan application information, mortgage lending practices, fair housing complaint data, and results from the private sector section of the 2012–2013 Fair Housing Survey for Housing Stakeholders.

Home Mortgage Disclosure Act (HMDA) data were used to analyze differences in home mortgage application denial rates in the NEOSCC Region by race, ethnicity, sex, income, and Census tract. Evaluation of home purchase loan applications from 2004 through 2011 showed that there were 328,557 loan originations and 65,149 denials, for an eight-year average loan denial rate of 16.5 percent. Denial rates were highest in 2006, at 20.0 percent. These HMDA data also showed that American Indian, black, and Hispanic applicants experienced far higher rates of loan denials than did white or Asian applicants, even after correcting for income in most cases. Further, these more frequently denied racial and ethnic groups may have been disproportionately impacted in some specific areas of the Region.

Analysis of originated loans with high annual percentage rates showed that black and Hispanic populations were also disproportionately issued these types of lower-quality loan products.

Black borrowers experienced a rate nearly twice that of white applicants, for example. With high proportions of low quality, high-annual percentage rate loans being issued to these particular groups, the burden of foreclosure may have fallen more heavily upon them.

Analysis of data from the CRA, which is intended to encourage investment in low- and moderate-income areas, showed that business loans did not tend to be directed toward the areas with highest poverty concentrations in the NEOSCC Region as commonly as they were toward moderate- and higher-income areas.

Fair housing complaint data were analyzed from HUD, the OCRC, the FHCS, and the FHRC. HUD data showed that 2,297 fair housing–related complaints were filed in the Region from 2004 through September of 2012. The number of complaints filed with this agency varied by year, ranging from 205 to 347. The protected classes most impacted by discrimination, based on the 1,184 complaints where cause was found, were disability, familial status, and race, and the most common complaint issues related to failure to make reasonable accommodation, discrimination in terms, conditions or privileges relating to rental, and discriminatory refusal to rent.

Complaints filed with the OCRC showed that of the 2,089 complaints, the most common issues were terms and conditions, reasonable accommodation, exclusion, harassment, and intimidation.

Results from the private sector portion of the 2012–2013 Fair Housing Survey for Housing Stakeholders, conducted from November of 2012 to July of 2013 as part of the Regional AI process, showed that some respondents saw possible issues of housing discrimination in the NEOSCC Region’s private housing sector.

## **D. BARRIERS TO HOUSING CHOICE IN THE PUBLIC SECTOR**

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The status of affirmatively furthering fair housing (AFFH) within the NEOSCC Region’s public sector was evaluated through review of selected public services, local policies, and practices; and the results of the public sector section of the Fair Housing Survey.

Evaluation of the distribution of housing vouchers, HUD-assisted rental properties, and other affordable housing in the Region demonstrated that these assisted housing options were relatively widely distributed, and tended to be concentrated in areas other than those with the highest poverty rates.

The 2012–2013 Fair Housing Survey for Government Officials, conducted online with many of the Region’s nonentitlement cities and counties, showed that many of these jurisdictions have in place some basic housing definitions such as “dwelling unit” and “family,” but most tend to be restrictive and may not be in the spirit of AFFH. Very few communities define “disability” in their codes or have policies in place to offer options for persons in need of modifications to policies for reasonable accommodation. Housing for seniors and group housing are not consistently addressed in local codes, despite being accommodated in State codes. Most communities lack fair housing ordinances or practices. Across the array of communities contacted, a wide variety of policies and practices exist, several of which are not in the spirit of

AFFH and may unwittingly discriminate against several groups. A more complete, consistent, and uniform approach could greatly benefit these communities in the Region.

Results of the Land Use Planning Interviews, conducted with the 22 entitlement cities and counties in the NEOSCC Region, revealed many similar issues among these communities. Some definitions of “dwelling unit” and “family” restricted housing to related families of a certain size or type, and some restricted group housing by zone despite State protections. Very few considerations were found for accessible housing or senior housing, and some policies restricting the concentration of group homes were found. Some cities may need to update their policies and codes in order to reflect the spirit of AFFH.

Some variations in local land use policies were seen within the NEOSCC Region. Within the NOACA metro area in particular, several potentially discriminatory definitions of “family” were seen, as well as several entitlement cities with no definition for “disability.” In addition, multiple group home density restrictions were seen; these may not be in the spirit of AFFH. In the NEFCO metro area, a few “family” or “dwelling unit” definition concerns were found, as well as some cities with no definition of “disability” and two cities with possibly restrictive group home policies. In the Eastgate metro area, many communities lacked policies or provisions for providing housing for particular groups, although few potential impediments were found. However, lack of provision for group homes and group home density restrictions were seen.

Results from the public sector section of the 2012–2013 Fair Housing Survey for Housing Stakeholders revealed that some respondents in the NEOSCC Region believe there are problematic practices or policies within the public sector. Of those that did, some noted land use policies and zoning laws that particularly impact protected class populations by limiting the location of group homes and other multi-family housing, and some respondents suggested that public transit services are lacking.

## E. PUBLIC INVOLVEMENT

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Public involvement opportunities were an intrinsic part of the development of this Regional AI. Activities included the 2012–2013 Fair Housing Survey for Housing Stakeholders to evaluate current fair housing efforts and the 13 fair housing forums wherein citizens were offered the chance to comment on initial findings of the Regional AI and offer feedback on prospective impediments. Also held were 11 formal fair housing presentations.

Results of the 2012–2013 Fair Housing Survey for Housing Stakeholders showed that the majority of respondents felt that fair housing laws are useful, whereas some respondents were not familiar with fair housing law. Of the respondents who answered the question, many noted the need for increased fair housing education and outreach activities, and a moderate need was indicated for increased fair housing testing activities.

The 13 public forums held across the Region in March of 2013 allowed citizens and agencies to voice concerns about barriers to fair housing choice. Comments received at these forums focused on lack of transportation options for some populations as well as predatory lending, primarily toward racial and ethnic minorities.





## VIII. IMPEDIMENTS, SUGGESTED ACTIONS, AND FHEA FINDINGS

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Provisions to affirmatively further fair housing are long-standing components of the U.S. Department of Housing and Urban Development's (HUD's) housing and community development programs. In exchange for receiving federal funds from HUD, the NEOSCC Region certifies that they are affirmatively furthering fair housing (AFFH). The requirements of such certification comprise the following elements:

- Conduct an Analysis of Impediments to Fair Housing Choice,
- Take actions to remedy impediments if impediments are identified, and
- Maintain records of the analysis and actions taken.

This report, which represents the first element in the certification process noted above, has resulted in the finding of several impediments to fair housing choice. HUD defines impediments to fair housing choice, reprinted here from the Fair Housing Planning Guide, page 2-8, as:

- Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin which restrict housing choices or the availability of housing choices [and]
- Any actions, omissions, or decisions which have [this] effect.<sup>41</sup>

While several issues within the housing market were uncovered in the process of conducting this Regional AI, only issues that qualify as impediments to fair housing choice were included based on the definition printed above.

The identified impediments in both the private and public sectors are listed, accompanied by specific actions that the NEOSCC Region may consider in an attempt to remedy these issues.

Following the list of private and public sector impediments, Table ES.1 is a matrix documenting the impediment, data source that indicated its existence, protected classes most affected, and level of need for action. Impediments that were identified in only one data source, such as the review of HUD complaint data, were indicated as having a relatively low need for action. Impediments found in two to three data sources were deemed to be of medium need, and impediments documented in four or more areas of research were noted to be of high need for action.

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<sup>41</sup> (HUD FHEO 1996, 2-8)

## A. IMPEDIMENTS TO FAIR HOUSING CHOICE AND SUGGESTED ACTIONS

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### 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 rating, 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.

## PUBLIC SECTOR

1. *Impediment:* Lack of 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:* Lack of sufficient fair housing outreach and education efforts

While Northeast Ohio tends to have a strong fair housing advocacy base, there still seems to be a lack of a sufficient 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:* Some 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:* Policies and practices used decades ago have resulted in segregation of minority populations

Fair housing choice in the Region is today still affected by bygone historical policies and practices that resulted in segregation of minority populations. This impediment may still 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:* Decisions regarding definitions of "family," "dwelling unit," and related terms

Decisions made by cities within the Region regarding definitions of "family," "dwelling unit" and related terms within land use planning and zoning policies may restrict housing choice for the classes of race, national origin, familial status and disability. This impediment was identified through review of the results of the Fair Housing Survey for Government Officials.

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.

6. *Impediment:* Lack of inclusionary 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 different types of housing throughout the Region.

**Table VIII.1**  
**Impediments Matrix**  
 NEOSCC Region  
 2013 Regional AI/FHEA Data

Impediment		Source										Protected Groups Most Affected	Need for Action
		Socio-Economic Data	Fair Housing Law/ Study/Case Review	Fair Housing Environment	HMDA Data	CRA Data	Complaint Data	Fair Housing Survey	Fair Housing Forums	Other <sup>42</sup>			
Private Sector													
1	Denial of available housing units in the rental markets		X				X	X			Black and Hispanic persons, families	H	
2	Discriminatory terms, conditions, privileges, or facilities relating to rental		X				X	X			All	H	
3	Failure to make reasonable accommodations or modifications		X				X	X			Disabled persons	H	
4	Steering activities in the rental markets							X			Black and Hispanic persons	L	
5	Preferences stated in advertisements for rental housing							X			All	L	
6	Denial of availability of housing in the home purchase markets							X			Black and Hispanic persons	L	
7	Steering activities in home sales markets		X					X			Black and Hispanic persons	M	
8	Denial of home purchase loans				X			X			Black and Hispanic persons	M	
9	Predatory lending in the home purchase market				X			X	X		Black and Hispanic persons	H	
10	Failure to comply with accessibility requirements in construction of housing units		X					X			Disabled persons	M	
Public Sector													
1	Lack of sufficient fair housing policies or practices by several units of local government		X					X		X	All	H	
2	Lack of sufficient fair housing outreach and education efforts							X	X	X	All	H	
3	Some land use and planning decisions and operational practices resulting in unequal access to government services such as transportation							X		X	All	M	
4	Policies and practices used decades ago resulted in segregation of minority populations		X					X		X	All	H	
5	Decisions regarding definitions of “family,” “dwelling unit,” and related terms		X							X	Disabled persons, families	M	
6	Lack of inclusionary policies		X					X		X	All	H	

<sup>42</sup> Other sources of data regarding possible issues or impediments include interviews or surveys with planning staff and other government officials, geographic data from local sources, additional stakeholder feedback, and any other data sources that informed specific, focused parts of the Regional AI.

## **B. FAIR HOUSING AND EQUITY ASSESSMENT FINDINGS**

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Equity and access to opportunity are critical underpinnings of the Sustainable Communities Regional Planning Grant (SCRPG) program. Grantees are creating a more inclusive conversation on regional issues, with a particular emphasis on engaging those who have traditionally been marginalized from the community planning process. This has provided new insight into the disparate burdens and benefits experienced by different groups across a region. One way to address these disparities is the Fair Housing and Equity Assessment (FHEA), which SCRPG program participants are required to complete.<sup>43</sup>

### **INTEGRATION AND SEGREGATION**

This FHEA evaluation quantified indices of segregation. These indices indicate that the NEOSCC Region had a lack of racial and ethnic diversity in some areas and high concentrations of racial and ethnic minorities in other areas. All three planning areas have counties that have dissimilarity indices that indicate the presence of high levels of segregation. These tend to have grown from a series of historical decisions pertaining to past discrimination and segregation actions by both public and private sector decision makers. It is time for our legacy to change.

### **RACIALLY AND ETHNICALLY CONCENTRATED AREAS OF POVERTY**

There were 61 Census tracts that were made up of at least 40 percent poverty and 50 percent non-white racial minorities (RCAPs); there was one Census tract that also had an ethnically concentrated area of poverty (ECAPs) throughout the NEOSCC Region, for a combined total of 61 tracts, or about 5.7 percent of the total tracts as of 2011. Census tracts representing RCAPs and/or ECAPs appeared in all three planning areas, with 41 in NOACA, 9 in NEFCO, and 11 in Eastgate. More than 96 percent of these RCAP and/or ECAP areas had unemployment rates of 10.1 percent or more, 98 percent of these tracts had more than one-third of renters experiencing cost burdens; more than 95 percent of these tracts had “other vacant” rates of 13.6 percent or more; and more than 75 percent had neighborhood school proficiency index values of less than 20, or very low.

### **AREAS OF OPPORTUNITY**

Areas of opportunity were quantitatively defined by a set of five relationships constructed of education, economics, housing, transportation, and public health. Within these categories, variables that were chosen include:

- A school proficiency index,
- High school graduation rates,
- A Labor market index,
- The share of housing that is occupied,
- The homeownership rate,

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<sup>43</sup> (HUD 2012) Regional Fair Housing and Equity Assessment  
[http://portal.hud.gov/hudportal/HUD?src=/program\\_offices/sustainable\\_housing\\_communities/regional\\_fairhsg\\_equityassesmt](http://portal.hud.gov/hudportal/HUD?src=/program_offices/sustainable_housing_communities/regional_fairhsg_equityassesmt)

- The lack of overcrowding,
- The lack of predatory loans,
- A high quality transit services index,
- Travel times to work, and
- An environmental hazard index.

Data were available at the Census tract- or block group-level.

The NEOSCC Region has 91 Census tracts with the highest ranking of opportunity. Of these 39 are in NOACA, 37 are in NEFCO, and 15 are in Eastgate. Interestingly, the metro area with the fewest people also has a proportionately greater number of areas of opportunity.

## **A CALL FOR PUBLIC AND PRIVATE INVESTMENT**

While specifying what particular efforts should be implemented throughout the 12-County Region is beyond the scope of this part of the NEOSCC Regional AI, key actions will be considered as part of NEOSCC's larger planning effort, Vibrant NEO 2040. Substantial economic development, public infrastructure, and affordable housing investments will result in gains, gains that will reduce disparities in burdens and benefits enjoyed by living in the NEOSCC Region.

Areas that have received private sector investment in the past have typically not been in areas of lower income residents, as demonstrated by the Community Reinvestment Act data evaluation. Areas that contain RCAP or ECAP areas are in need of both public and private investment.

Such investment can be removal of "other vacant" dwellings not available to the marketplace, rehab of existing structures, redevelopment of existing vacant buildings, redevelopment of underutilized housing, or replacement of old and dilapidated infrastructure. Expansion of the public transportation system is a key objective. Greater access to areas of opportunity would be a key in the process of creating opportunity to those currently not able to access these areas of the NEOSCC Region. Additionally, future investments in public and assisted housing, particular for the production of affordable housing, should consider the spatial distribution of existing residents and whether the proposed affordable housing project is over concentrating racial and ethnic minorities.



## IX. ORGANIZATION BACKGROUND

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### A. NORTHEAST OHIO SUSTAINABLE COMMUNITIES CONSORTIUM

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In June 2009, the U.S. Department of Housing and Urban Development (HUD), U.S. Department of Transportation (DOT), and the U.S. Environmental Protection Agency (EPA) joined together to create the Partnership for Sustainable Communities. The aim of the Partnership is to help communities nationwide improve access to affordable housing, increase transportation options, and lower transportation costs while protecting the environment.

The Partnership for Sustainable Communities coordinates federal housing, transportation, water, and other infrastructure investments to make neighborhoods more prosperous, allow people to live closer to jobs, save households time and money, and reduce pollution. The Partnership agencies incorporate the Partnership's six principles of livability into federal funding programs, policies, and future legislative proposals.

During the summer of 2010, a group of key Northeast Ohio regional players, including the Region's metropolitan planning organizations, six of the 12 counties, five of the largest cities, three metropolitan housing authorities, the Fund for Our Economic Future, the Regional Prosperity Initiative, and Cleveland State University, convened to develop and submit a proposal for the Partnership for Sustainable Communities Category One: Planning Grants. During the proposal planning process, which was funded by the Fund for Our Economic Future, this unprecedented collaboration of stakeholders in Northeast Ohio agreed to establish a new, independent initiative with a formal, truly collaborative governance structure and a small but dedicated operating structure. The Northeast Ohio Areawide Coordinating Agency (NOACA) volunteered to serve as the lead applicant and fiscal agent on the proposal submission.

In November of 2010, Northeast Ohio was awarded a \$4.25 million federal grant from HUD to fund the development of a regional sustainability plan. In order to manage the three-year planning process, the Northeast Ohio Sustainable Communities Consortium (NEOSCC) was established in January 2011. The NEOSCC will develop a coordinated and integrated approach to planning efforts for land use, transportation, economic and workforce development, and infrastructure investments for a 12-county planning area comprising Ashtabula, Cuyahoga, Geauga, Lake, Lorain, Mahoning, Medina, Portage, Summit, Stark, Trumbull, and Wayne counties.

Building on the original 23 member organizations, the NEOSCC Board has added 10 additional members and now includes 33 organizations. These members have committed more than \$2.3 million of in-kind services as part of the required match for the grant proposal.

A small staff, participating members of the NEOSCC, community leaders, and consultants lead the program work. During the course of the plan development, a variety of engagement efforts will be launched to facilitate input from stakeholders throughout the entire Northeast Ohio Region.

## NEOSCC'S MISSION

NEOSCC's purpose centers on three words:

- **Vibrant**—Full of energy and enthusiasm: vigorous, lively, and vital;
- **Resilient**—Responsive to change, adaptable, able to spring back and rebound; and
- **Sustainable**—Meeting present needs while retaining the ability to meet future needs, not exhausting resources.

NEOSCC's mission is to create conditions for a more vibrant, resilient, and sustainable Northeast Ohio—a Northeast Ohio that is full of vitality, a good steward of its built and natural resources, and adaptable and responsive to change.

## B. VIBRANT NEO 2040

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Vibrant NEO 2040 is a regional visioning and decision-making framework. This initiative is founded on the idea that a shared vision for the future, developed through a robust community and stakeholder engagement process, will lead us to a healthier, more economically and socially equitable future for the region. It is a new way of doing business for Northeast Ohio.

Vibrant NEO 2040 is an opportunity for Northeast Ohio communities to explore the Region's long-term development patterns and for Northeast Ohioans to think together about what we want for the future of our region. The goal of Vibrant NEO 2040 is to create a shared framework for our future that reflects the values, voices and vision of Northeast Ohioans.

In short, Vibrant NEO 2040 will be a roadmap to a stronger Northeast Ohio, a roadmap that NEOSCC will be charting with YOU – the residents and organizations of this region.

And Vibrant NEO 2040 will be a roadmap that needs to be followed. It will be a plan that we all need to see implemented. So, to ensure NEOSCC members have bought into Vibrant NEO 2040 and carry forth its vision, NEOSCC will seek the approval of Vibrant NEO 2040 by its Governing Board in October 2013.

## X. GLOSSARY

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**Accessible housing:** Housing designed to allow easier access for physically disabled or vision impaired persons.

**ACS:** American Community Survey

**AFFH:** Affirmatively furthering fair housing [choice]

**AI:** Analysis of Impediments to Fair Housing Choice

**AMI:** Area median income

**BEA:** Bureau of Economic Analysis

**BLS:** Bureau of Labor Statistics

**CDBG:** Community Development Block Grant

**Census tract:** Census tract boundaries are updated with each decennial census. They are drawn based on population size and ideally represent approximately the same number of persons for each tract.

**COG:** Council of Governments

**Consolidated Plan:** Consolidated Plan for Housing and Community Development

**Cost burden:** Occurs when a household has gross housing costs that range from 30.1 to 50 percent of gross household income.

**CNT:** Center for Neighborhood Technology

**CPD:** HUD Office of Community Planning and Development

**CRA:** Community Reinvestment Act

**Disability:** A lasting physical, mental, or emotional condition that makes it difficult for a person to conduct daily activities of living or impedes him or her from being able to go outside the home alone or to work.

**Disproportionate share:** Exists when the percentage of a population is 10 percentage points or more above the study area average.

**DOJ:** U.S. Department of Justice

**Eastgate:** Eastgate Regional Council of Governments

**ECAP:** Ethnically Concentrated Area of Poverty

**ESG:** Emergency Shelter Grants program

**FHCS:** Fair Housing Contact Service

**FHEA:** Fair Housing and Equity Assessment

**FHRC:** Fair Housing Resource Center, Inc.

**Fannie Mae:** Federal National Mortgage Association (FNMA), a government-sponsored enterprise that purchases mortgages from lenders and repackages them as mortgage-backed securities for investors.

**Family:** A family is a group of two people or more related by birth, marriage, or adoption and residing together.

**FFIEC:** Federal Financial Institutions Examination Council

**FHAP:** Fair Housing Assistance Program

**FHEO:** Fair Housing and Equal Opportunity

**FHIP:** Fair Housing Initiative Program

**Floor area ratio:** The ratio of the total floor area of a building to the land on which it is situated, or the limit imposed on such a ratio.

**Freddie Mac:** Federal Home Loan Mortgage Corporation (FHLMC), a government-sponsored enterprise that purchases mortgages from lenders and repackages them as mortgage-backed securities for investors.

**GAO:** U.S. General Accounting Office

**Gross housing costs:** For homeowners, gross housing costs include property taxes, insurance, energy payments, water and sewer service, and refuse collection. If the homeowner has a mortgage, the determination also includes principal and interest payments on the mortgage loan. For renters, this figure represents monthly rent and electricity or natural gas energy charges.

**H+T<sup>®</sup> Index:** The Center for Neighborhood Technology's Housing and Transportation Affordability Index. Planners, lenders, and most consumers traditionally measure housing affordability as 30 percent or less of income. The H+T<sup>®</sup> Index proposes expanding the definition of housing affordability to include transportation costs to better reflect the true cost of households' location choices. Based on research in metro areas ranging from large cities with extensive transit to small metro areas with extremely limited transit options, the CNT has found 15 percent of income to be an attainable goal for transportation affordability. By combining this 15 percent level with the 30 percent housing affordability standard, the H+T<sup>®</sup> Index recommends a new view of affordability, one defined as combined housing and transportation costs consuming no more than 45 percent of household income.

**HAL:** High annual percentage rate (APR) loan, defined as more than three percentage points higher than comparable treasury rates for home purchase loans, or five percentage points higher for refinance loans.<sup>44</sup>

**HMDA:** Home Mortgage Disclosure Act

**HOME:** HOME Investment Partnerships

**HOPWA:** Housing Opportunities for Persons with AIDS

**Household:** A household consists of all the people who occupy a housing unit. A house, an apartment or other group of rooms, or a single room, is regarded as a housing unit when it is occupied or intended for occupancy as separate living quarters; that is, when the occupants do not live with any other persons in the structure and there is direct access from the outside or through a common hall.

**Housing problems:** Overcrowding, incomplete plumbing or kitchen facilities, or cost burdens

**HUD:** U.S. Department of Housing and Urban Development

**Incomplete kitchen facilities:** A housing unit is classified as lacking complete kitchen facilities when any of the following are not present: a sink with piped hot and cold water, a range or cook top and oven, and a refrigerator.

**Incomplete plumbing facilities:** A housing unit is classified as lacking complete plumbing facilities when any of the following are not present: piped hot and cold water, a flush toilet, and a bathtub or shower.

**Labor force:** The total number of persons working or looking for work

**MFI:** Median family income

**Mixed-use development:** The use of a building, set of buildings, or neighborhood for more than one purpose.

**MPO:** Metropolitan Planning Organization

**MSA:** Metropolitan Statistical Area

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<sup>44</sup> (Board of Governors of the Federal Reserve System 2002)



**NEFCO:** Northeast Ohio Four County Regional Planning and Development Organization

**NEOSCC:** Northeast Ohio Sustainable Communities Consortium

**NIMBYism:** “Not in my backyard” mentality among community members, often in protest of affordable or multi-family housing.

**NOACA:** Northeast Ohio Areawide Coordinating Agency

**OSHC:** HUD’s Office of Sustainable Housing and Communities

**Other vacant units:** Housing units that are not for sale or rent

**Overcrowding:** Overcrowding occurs when a housing unit has more than one to 1.5 persons per room.

**Poverty:** The Census Bureau uses a set of money income thresholds that vary by family size and composition to determine who is in poverty. If a family’s total income is less than the family’s threshold, then that family and every individual in it is considered in poverty. The official poverty thresholds do not vary geographically, but they are updated for inflation using Consumer Price Index (CPI-U). The official poverty definition uses money income before taxes and does not include capital gains or noncash benefits (such as public housing, Medicaid, and food stamps).

**Predatory loans:** As defined by the Predatory Lending Consumer Protection Act of 2002 as well as the Home Owner Equity Protection Act (HOEPA), loans are considered predatory based on:

1. If they are HOEPA loans;<sup>45</sup>
2. Lien status, such as whether secured by a first lien, a subordinate lien, not secured by a lien, or not applicable (purchased loans); and
3. Presence of HALs. For full definition, see **HAL**.

**Protected Class:** Group of people protected from discrimination and harassment. Ohio residents are protected from housing discrimination based on race, sex, religion, familial status, disability, national origin, color, ancestry, and military status.

**Public housing:** Public housing was established to provide decent and safe rental housing for eligible low-income families, the elderly, and persons with disabilities.

**Regional AI:** Regional Analysis of Impediments to Fair Housing Choice

**RCAP:** Racially Concentrated Area of Poverty

**RDA:** Redevelopment agency

**SCI:** Sustainable Communities Initiative (see **OSHC**). The SCI consists of two grant programs: Sustainable Communities Regional Planning Grants and Community Challenge Planning Grants.

**SCRPG:** Sustainable Communities Regional Planning Grant Program (see **SCI**)

**Severe cost burden:** Occurs when gross housing costs represent 50.1 percent or more of gross household income.

**Severe overcrowding:** Occurs when a housing unit has more than 1.5 persons per room.

**Steering:** Actions of real estate agents or landlords to discourage a prospective buyer or tenant from seeing or selecting properties in certain areas due to their racial or ethnic composition.

**Tenure:** The status by which a housing unit is held. A housing unit is “owned” if the owner or co-owner lives in the unit, even if it is mortgaged or not fully paid for. A cooperative or condominium unit is “owned” only if the owner or co-owner lives in it. All other occupied

<sup>45</sup> Loans are subject to the HOEPA if they impose rates or fees above a certain threshold set by the Federal Reserve Board. (FFEIC n.d.)

units are classified as “rented,” including units rented for cash rent and those occupied without payment of cash rent.

## **XI. APPENDICES**

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### **A. REGIONAL AI ENGAGEMENT FRAMEWORK**

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The NEOSCC's Engagement Framework and principles are included in this appendix.

## Northeast Ohio Sustainable Communities Consortium

### **Engagement Framework**

A critical component of the Consortium's work, if not the most critical, is the engagement of stakeholders throughout Northeast Ohio in the planning process. The 12-county planning foot print contains diverse geographical, cultural, demographic and commercial stakeholders that constitute Northeast Ohio's unique strengths. It is in bringing this diversity together to design a vision in which they are vested, that a plan and shared commitment can lead to action.

As part of the Regional Analysis of Impediments to Fair Housing Choice, NEOSCC is committed to providing ample opportunity for citizens and communities of Northeast Ohio to share their views on Fair Housing Choice. In striving to create a shared vision for the NEOSCC efforts, one of the primary goals for engagement is to:

- Reach as many individuals and organizations throughout the 12 counties to engage and act. Paying particular attention to the following groups:
  - those typically underserved or unrepresented in the planning process- working with the marginalized while accommodating limited English speakers, persons with disabilities and the aging
  - those who historically have not found value in previous planning activities
  - those who dismiss this effort for other reasons

In order to meet its goal of "Engage in a Dialogue that leads to action," the NEOSCC Communications and Engagement Committee identified four key elements of its engagement process to ensure a more meaningful participatory experience: **Learning, Sharing, Creating and Acting**. These elements are seen as critical to all engagement activities and will be organic in the processes.

The following are other key principles of the NEOSCC engagement efforts:

<b>BACK AND FORTH</b>	A dialogue will be created and a timely follow-up loop will be documented and celebrated. This is critical in creating a shared vision and vested interest.
<b>EVERY VOTE COUNTS</b>	Ensure that contributions influence decision making
<b>SEE-THROUGH</b>	Be transparent, genuine and support the mission of the NEOSCC
<b>SEEING IS BELIEVING</b>	Throughout the engagement process, visualization techniques will be used to gather opinion, clarify, and build consensus
<b>MAKE IT WORK</b>	Engagement will be flexible and use creative approaches. It will also be tailored to reach diverse audiences

NEOSCC and Vibrant NEO 2040 are largely funded by a highly competitive, first-of-its kind, \$4.25M federal grant from the U.S. Department of Housing and Urban Development (HUD) as part of the Partnership for Sustainable Communities Initiative. The Sustainable Communities Initiative is an interagency collaboration among HUD, the U.S. Department of Transportation, and the U.S. Environmental Protection Agency.



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<b>A SEAT AT THE TABLE</b>	Embrace and respect difference of opinion and the challenging viewpoints
<b>EVERY WHICH WAY</b>	Develop opportunities for participants to understand and engage each other
<b>MAKE IT FUN</b>	This should be an energetic process that attracts interest and participation
<b>EARLY AND OFTEN</b>	Encourage early and active participation
<b>NO PERMISSION NEEDED</b>	Nurture leadership and a high level of involvement
<b>MEASURING UP</b>	Implement evaluation and measurement tools to ensure effectiveness

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## Regional Analysis of Impediments to Fair Housing Choice

NEOSCC has established the following citizen and community engagement protocol for the development of the Regional Analysis of Impediments to Fair Housing Choice.

30-day advance public notice will be given for all public meetings.

- All public meetings will be held at locations accessible to people with disabilities.
- All public meetings will be held at a time and place convenient to people, with easily accessible parking and along public transportation routes (if available).
- NEOSCC will provide translators for people who do not speak English when requests are made at least five days prior to the public meeting.
- The following forms of public notice are:
  - Print:
    - Flyers of overall public meeting schedule in all 12 counties and in each county
  - NEOSCC Website:
    - Downloadable flyer of overall meeting schedule
    - Calendar page listing all public meetings
    - Fair Housing Forums page



- Email Blasts:
  - NEOSCC newsletter (1,300+ contacts)
  - NEOSCC Board Member Organizations (66 contacts)
  - NEOSCC Housing and Communities Work Stream (54 contacts)
  - NEOSCC Regional Ai Progress Review Team (38 contacts)
  - Fair Housing Agencies (in all 12 counties)
  - Public Housing Authorities (in all 12 counties)
- Social Media Launch:
  - Blog post
  - Twitter
  - Facebook post
  - LinkedIn post
- Miscellaneous:
  - NEOSCC Vibrant NEO 2040 presentations
  - Flyer Distribution at NEOSCC Events
  - Request promotional assistance from local jurisdictions
  - Press release to newspapers of general circulation in each NEOSCC housing market: Akron, Ashtabula, Canton-Massillon, Cleveland, Wooster, and Youngstown-Warren
  - Media advisory to all 12 county publications

## **B. FAIR HOUSING SURVEY FOR HOUSING STAKEHOLDERS**

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This appendix presents the entirety of the Fair Housing Survey for Housing Stakeholders.

## 2012 Northeast Ohio Fair Housing Survey for Housing

### 1. Fair Housing in Your Community

Ensuring equal access to housing is a vital part of making our Northeast Ohio communities great places to live. The Northeast Ohio Sustainable Communities Consortium (NEOSCC) is currently conducting a study concerning fair housing. The study is called a "Regional Analysis of Impediments to Fair Housing Choice", better known as a Regional AI. NEOSCC is largely funded by a highly competitive, first-of-its kind, \$4.25M federal grant from the U.S. Department of Housing and Urban Development (HUD) as part of the Partnership for Sustainable Communities Initiative. The Sustainable Communities Initiative is an interagency collaboration among HUD, the U.S. Department of Transportation, and the U.S. Environmental Protection Agency.

The NEOSCC is conducting this study about fair housing choice in its 12 county region. The goals of the study are to identify whether barriers to fair housing choice exist in Northeast Ohio in the rental and real estate markets and the mortgage lending, insurance, and appraisal industries. The study looks at both public and private policies and practices that may inadvertently lead to housing discrimination.

This Regional AI process includes soliciting the opinions of persons involved in the housing industry. That's why we're asking you to provide your opinions and experiences regarding fair housing in your community in the 12 county Northeast Ohio region.

Your answers are anonymous and will only be reported in a compilation with all other responses. The survey should take up to about 10 minutes. Thank you for your time.

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## 2012 Northeast Ohio Fair Housing Survey for Housing

### \* 1. Which one city will you be referencing in this survey?

Throughout the survey, please make sure that all of your responses relate to the same one area.

If you wish to address an additional area, please complete this survey and then take it a second time, indicating the other geographic area.

- ☐ Akron
- ☐ Alliance
- ☐ Barberton
- ☐ Canton
- ☐ Cleveland
- ☐ Cleveland Heights
- ☐ Cuyahoga Falls
- ☐ East Cleveland
- ☐ Elyria
- ☐ Euclid
- ☐ Kent
- ☐ Lakewood
- ☐ Lorain
- ☐ Massillon
- ☐ Mentor
- ☐ Parma
- ☐ Warren
- ☐ Youngstown
- ☐ Other

If you selected "Other," please specify.

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## 2012 Northeast Ohio Fair Housing Survey for Housing

**\* 2. Throughout the survey, your responses will relate to the one area you chose in the first question. However, please tell us the county in which your community resides.**

☐ Ashtabula County  
☐ Cuyahoga County  
☐ Geauga County  
☐ Lake County  
☐ Lorain County  
☐ Mahoning County  
☐ Medina County  
☐ Portage County  
☐ Stark County  
☐ Summit County  
☐ Trumbull County  
☐ Wayne County  
☐ Other--Outside Northeast Ohio region

If you selected "Other," please specify.

**3. What is your primary role in the housing industry?**

<input type="radio"/> Advocate/Service Provider	<input type="radio"/> Law/Legal services
<input type="radio"/> Banking/Finance	<input type="radio"/> Local government
<input type="radio"/> Construction/Development	<input type="radio"/> Property management
<input type="radio"/> Condo or Homeowner Association leader	<input type="radio"/> Real estate
<input type="radio"/> Insurance	<input type="radio"/> Resident Advisory Council leader
<input type="radio"/> Other (please specify)	

## 2. Federal, State and Local Fair Housing Laws

First, let's talk about fair housing laws. Fair housing laws prohibit discrimination against protected classes of persons in the buying or leasing of housing. In Ohio, fair housing laws are covered by the Federal Fair Housing Act as well as the Ohio Fair Housing Law.

## 2012 Northeast Ohio Fair Housing Survey for Housing

### 1. How familiar are you with fair housing laws?

- ☐ Not familiar
 ☐ Somewhat familiar
 ☐ Very familiar

If you selected "Somewhat familiar" or "Very familiar," please describe how you became aware of fair housing laws.

### 2. Do you think fair housing laws serve a useful purpose?

- ☐ Yes
 ☐ No
 ☐ Don't know

### 3. Do you think fair housing laws are difficult to understand or follow?

- ☐ Yes
 ☐ No
 ☐ Don't know

4. Under fair housing law, it is illegal to discriminate in housing matters based upon a person's race or disability, for example. Therefore, race and disability are protected classes.

Please cite any other classes of persons protected under fair housing law in your community in the spaces below.

1.	<input type="text"/>
2.	<input type="text"/>
3.	<input type="text"/>
4.	<input type="text"/>
5.	<input type="text"/>
6.	<input type="text"/>
7.	<input type="text"/>
8.	<input type="text"/>
9.	<input type="text"/>
10.	<input type="text"/>

5. Where would you refer someone whose fair housing rights had been violated so that they could file a complaint?

### 6. Do you feel that fair housing laws are adequately enforced in your designated community?

- ☐ Yes
 ☐ No
 ☐ Don't Know

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## 2012 Northeast Ohio Fair Housing Survey for Housing

**7. Based on your knowledge of fair housing law, do you think that fair housing laws should be changed?**

☐ Yes
 ☐ No
 ☐ Don't know

If you answered "Yes," how should fair housing laws be changed?

### 3. Fair Housing Activities in Your Designated Community

Now let's talk about fair housing activities in your designated community.

**1. Outreach and education activities, such as training and seminars, are used to help people better understand their rights and obligations under fair housing law.**

**Are you aware of any educational activities or training opportunities available to you to learn about fair housing laws?**

☐ Yes
 ☐ No
 ☐ Don't know

**2. If you answered "yes" to the previous question, have you participated in fair housing activities or training?**

☐ Yes
 ☐ No
 ☐ Don't know

**3. Please assess the level of fair housing outreach and education activity in your designated community.**

☐ There is too much
 ☐ There is too little  
☐ There is the right amount
 ☐ Don't know

**4. Fair housing testing is often used to assess potential violations of fair housing law. Testing can include activities such as evaluating building practices to determine compliance with accessibility laws or testing if some people are treated differently when inquiring about available rental units.**

**Are you aware of any fair housing testing of any sort in your designated community?**

☐ Yes
 ☐ No
 ☐ Don't know

**5. Please assess the current level of fair housing testing in your designated community.**

☐ There is too much
 ☐ There is too little  
☐ There is the right amount
 ☐ Don't know

### 4. Barriers to Fair Housing in the Private Sector



## 2012 Northeast Ohio Fair Housing Survey for Housing

HUD defines barriers to fair housing choice as "actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin which restrict housing choices or the availability of housing choices."

In the questions below, please think about the PRIVATE SECTOR housing issue cited in the question and tell us if you are aware of any barriers related to fair housing choice in each private sector area. If you can think of practices or barriers, identify them in the box provided. Please note, examples provided represent only one of many possible scenarios.

Are you aware of any barriers to fair housing choice in your designated community regarding:

**1. The rental housing market? (Example: Refusing to rent based on religion or color.)**

☐ Yes

☐ No

☐ Don't know

If you answered "Yes" to this question, please discuss the barriers to fair housing choice in the rental housing market in the box below.

**2. The real estate industry? (Example: Only showing properties to families with children in certain areas.)**

☐ Yes

☐ No

☐ Don't know

If you answered "Yes" to this question, please discuss the barriers in the box below.

**3. The mortgage and home lending industry? (Example: Offering higher interest rates to women or racial minorities.)**

☐ Yes

☐ No

☐ Don't know

If you answered "Yes" to this question, please discuss the barriers in the box below.

## 2012 Northeast Ohio Fair Housing Survey for Housing

**4. The housing construction or housing design fields? (Example: New rental complexes built with narrow doorways that do not allow wheelchair accessibility.)**

☐ Yes

☐ No

☐ Don't know

If you answered "Yes" to this question, please discuss the barriers in the box below.

**5. The home insurance industry? (Example: Limiting policies and coverages to racial minorities.)**

☐ Yes

☐ No

☐ Don't know

If you answered "Yes" to this question, please discuss the barriers in the box below.

**6. The home appraisal industry? (Example: Basing home values on the ethnic composition of neighborhoods.)**

☐ Yes

☐ No

☐ Don't know

If you answered "Yes" to this question, please discuss the barriers in the box below.

**7. Any other housing services?**

☐ Yes

☐ No

☐ Don't know

If you answered "Yes" to this question, please identify the housing service and discuss the barriers in the box below.

### 5. Barriers to Fair Housing in the Public Sector

Now let's talk about the status of fair housing choice in the PUBLIC SECTOR in your designated community. In the questions below, please indicate if you are aware of any policies or practices that may act as barriers to fair housing choice. If you are aware of any such practices or barriers, please explain them in the box provided.

Are you aware of any barriers to fair housing choice in your designated community regarding:

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## 2012 Northeast Ohio Fair Housing Survey for Housing

### 1. Land use policies? (Example: Policies that concentrate multi-family housing in limited areas.)

☐ Yes

☐ No

☐ Don't know

If you answered "Yes" to this question, please discuss the barriers to fair housing choice in regard to zoning laws in the box below.

### 2. Zoning laws? (Example: Laws that restrict placement of group homes.)

☐ Yes

☐ No

☐ Don't know

If you answered "Yes" to this question, please discuss the barriers in the box below.

### 3. Occupancy standards or health and safety codes? (Example: Codes being inadequately enforced in immigrant communities.)

☐ Yes

☐ No

☐ Don't know

If you answered "Yes" to this question, please discuss the barriers in the box below.

### 4. Property assessment and tax policies? (Example: Lack of tax incentives for making reasonable accommodations or modifications.)

☐ Yes

☐ No

☐ Don't know

If you answered "Yes" to this question, please discuss the barriers in the box below.

### 5. The permitting process? (Example: Not offering written documents on procedures in alternate languages.)

☐ Yes

☐ No

☐ Don't know

If you answered "Yes" to this question, please discuss the barriers in the box below.

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### 2012 Northeast Ohio Fair Housing Survey for Housing

**6. Housing construction standards? (Example: Lack of or confusing guidelines for the construction of accessible housing.)**

☐ Yes
 ☐ No
 ☐ Don't know

If you answered "Yes" to this question, please discuss the barriers in the box below.

**7. Neighborhood or community development policies? (Example: Policies that encourage development in narrowly defined areas of the community.)**

☐ Yes
 ☐ No
 ☐ Don't know

If you answered "Yes" to this question, please discuss the barriers in the box below.

**8. Are you aware of any barriers that limit access to government services, such as a lack of transportation or employment services?**

☐ Yes
 ☐ No
 ☐ Don't know

If you answered "Yes" to this question, please discuss the barriers in the box below.

**9. Are there any other public administrative actions or regulations in your community that act as barriers to fair housing choice?**

☐ Yes
 ☐ No
 ☐ Don't know

If you answered "Yes" to this question, please indicate the administrative action or regulation and discuss how it creates barriers to fair housing choice.

### 6. Concluding Questions

Thank you again for taking part in this research effort. There are just a few general questions we have before the end.

**1. Are you aware of any city or county fair housing ordinance, regulation, or plan?**

☐ Yes
 ☐ No
 ☐ Don't know



### 2012 Northeast Ohio Fair Housing Survey for Housing

**2. Are there any specific geographic areas in your designated community that have fair housing problems?**

☐ Yes
 ☐ No
 ☐ Don't know

If you answered "Yes," please describe the geographic areas with fair housing problems and the types of issues these areas have.

**3. Are there any specific groups in your designated community that face housing discrimination?**

☐ Yes
 ☐ No
 ☐ Don't know

If you answered "Yes," please describe the groups that face housing discrimination and the types of issues these groups have.

**4. Please share any additional comments regarding fair housing in the box below.**

**5. The information you share with us will be anonymous. However, if we have questions about any of your responses, we would like to be able to contact you for clarification. Please provide the following information:**

Organization:

Name:

E-mail address:

Phone number:

Zip code:

**6. The Regional AI is expected to be available for public review sometime in May 2013. Would you like to receive notification by email at the address provided above?**

☐ Yes; I provided my email above.
 ☐ No



## C. FAIR HOUSING SURVEY FOR GOVERNMENT OFFICIALS

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This appendix presents the entirety of the Fair Housing Survey for Government Officials.

## 2012 Northeast Ohio Fair Housing Survey for Government Officials

### 1. Introduction to the Fair Housing Survey

Access to fair housing is a vital part of making our Northeast Ohio communities great places to live. We want to hear about your housing experiences. Through its Vibrant NEO 2040 initiative, the Northeast Ohio Sustainable Communities Consortium (NEOSCC) is working to create a vibrant and resilient Northeast Ohio that increases our quality of life, connects our communities, welcomes diversity, restores and protects our natural resources and creates a competitive economic framework for our region. A big part of our work is focusing on the way we live in our communities, including taking a good look at fair and equal access to housing.

The U.S. Department of Housing and Urban Development requires us to conduct an assessment concerning fair housing in Northeast Ohio as part of the federal Partnership for Sustainable Communities Initiative. NEOSCC and Vibrant NEO 2040 are largely funded by a highly competitive, first-of-its kind, \$4.25M federal grant from the U.S. Department of Housing and Urban Development (HUD) as part of the Partnership for Sustainable Communities Initiative. The Sustainable Communities Initiative is an interagency collaboration among HUD, the U.S. Department of Transportation, and the U.S. Environmental Protection Agency. The goal of the fair housing assessment for NEOSCC is to identify and document how we're working regionally to overcome any barriers to fair housing choice.

As a leader in the region we would ask for your involvement in this assessment. That's why we're requesting your participation in this survey to provide your opinions and experiences regarding fair housing in your community.

Your answers will be anonymous and will only be reported in a compilation with other responses. This survey should take about 10 minutes to complete.

**\* 1. What is the name of your city, village, township, or county?**

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## 2012 Northeast Ohio Fair Housing Survey for Government Officials

**\* 2. In which county is your city, village, or township located? For county staff persons filling out this survey, simply select your county.**

- ☐ Ashtabula County
- ☐ Cuyahoga County
- ☐ Geauga County
- ☐ Lake County
- ☐ Lorain County
- ☐ Mahoning County
- ☐ Medina County
- ☐ Portage County
- ☐ Stark County
- ☐ Summit County
- ☐ Trumbull County
- ☐ Wayne County
- ☐ Other (Outside the region)

If you selected "Other," please specify

### 2. Housing Development in Your Jurisdiction

Does your jurisdiction have in its planning or development codes:

**1. Definitions for the terms "dwelling unit" or "residential unit"?**

- ☐ Yes ☐ No ☐ Don't know

If you selected "Yes," please describe below.

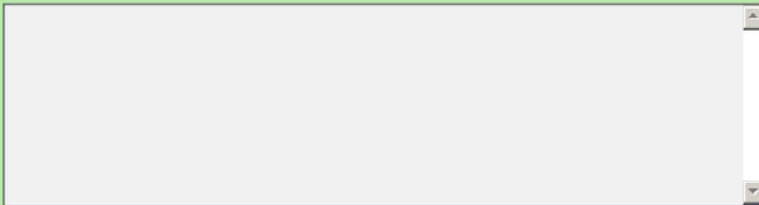
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**2. Guidelines that encourage the development of affordable housing units, such as mixed income housing or inclusionary zoning, defined as a mandatory approach that requires developers to make a portion of the housing units in their project affordable to low- and moderate-income households?**

☐ Yes☐ No☐ Don't know

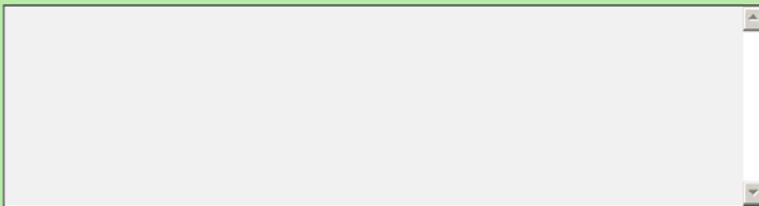
If you selected "Yes," please describe below.



**3. Any potential barriers to providing low- to moderate-income housing, such as neighborhood resistance, growth control measures, or superfluous permitting/building requirements or fees?**

☐ Yes☐ No☐ Don't Know

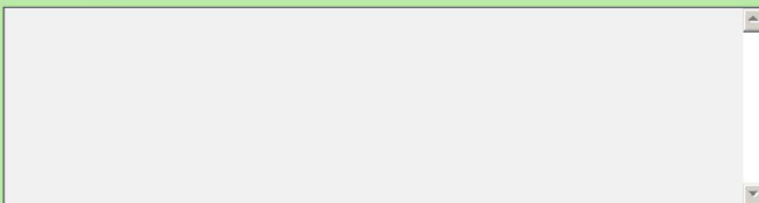
Please describe the barriers or assistance options for providers of affordable housing.



**4. A definition for the term "family"?**

☐ Yes☐ No☐ Don't know

If you selected "Yes," please describe briefly, including the number of non-related persons allowed in a dwelling unit.



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## 2012 Northeast Ohio Fair Housing Survey for Government Officials

**5. Residential occupancy standards or limits, such as a standard of no more than two persons per bedroom or a limit of five unrelated persons in a single-family home?**

☐ Yes

☐ No

☐ Don't know

If you selected "Yes," please describe below.

**6. Guidelines that allow the development of mixed use housing, defined as buildings serving as a combination of residential, commercial, office, institutional, or other use?**

☐ Yes

☐ No

☐ Don't know

If you selected "Yes," do you offer any financial or other incentives to developers of mixed use housing?

**7. Any potential barriers to the development of mixed use housing, such as strict zoning requirements, height or density restrictions, or any other challenges?**

☐ Yes

☐ No

☐ Don't Know

If you selected "Yes," please describe below.

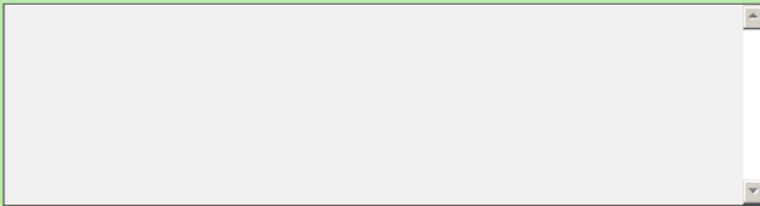
### 3. Special Needs Housing in Your Jurisdiction

Does your jurisdiction have in its planning or development codes:

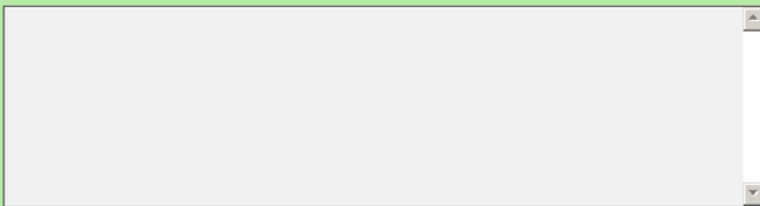
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**2012 Northeast Ohio Fair Housing Survey for Government Officials****1. A definition for the term "disability"?**☐ Yes☐ No☐ Don't know

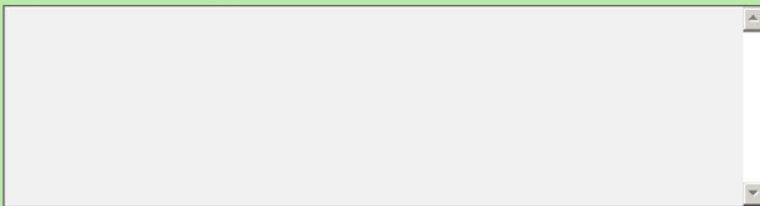
If you selected "Yes," please describe below.

**2. Standards for the construction of accessible multi-family housing, including monitoring and compliance?**☐ Yes☐ No☐ Don't know

If you selected "Yes," please describe below.

**3. Options for persons with disabilities to request reasonable accommodations or modifications to the jurisdiction's policies if necessary for accessible housing?**☐ Yes☐ No☐ Don't know

If you selected "Yes," please describe below.



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**4. Standards for the development of senior housing, such as housing that must be solely occupied by persons 62 years of age or older, or where 80 percent of the units are occupied by at least one person who is at least 55 years of age?**

☐ Yes

☐ No

☐ Don't know

If you selected "Yes," please describe how and in which zones these standards are applied.

**5. Guidelines that distinguish senior citizen housing from other residential uses, including with conditional use permits, parking differences, or other code requirements?**

☐ Yes

☐ No

☐ Don't know

If you selected "Yes," please describe below.

**6. Guidelines for the provision of housing for any other special needs populations (those struggling with homelessness, domestic violence, substance abuse recovery, youth in crisis, HIV/AIDS, etc.), such as exceptions that allow such housing in residential zones?**

☐ Yes

☐ No

☐ Don't know

If you selected "Yes," please describe the policy that allows such housing.

### 4. Fair Housing in Your Jurisdiction

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## 2012 Northeast Ohio Fair Housing Survey for Government Officials

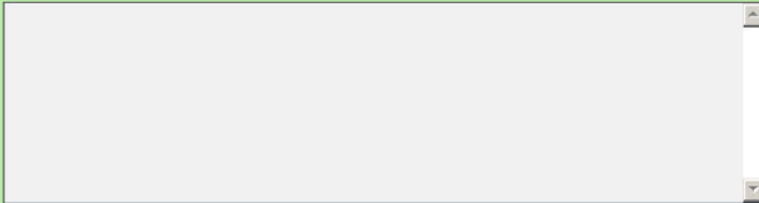
**1. Does your jurisdiction have policies or codes for "affirmatively furthering fair housing" practices?**

☐ Yes

☐ No

☐ Don't know

If you selected "Yes," please describe below.



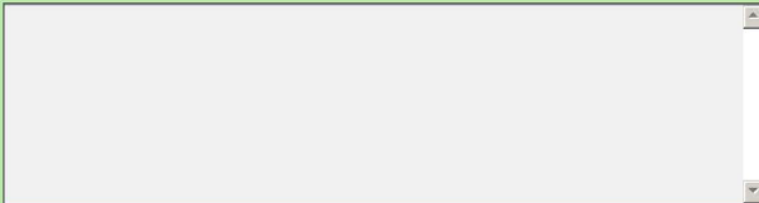
**2. Does your jurisdiction have a fair housing ordinance, policy, or regulation?**

☐ Yes

☐ No

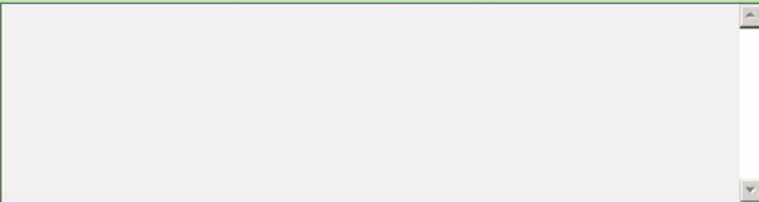
☐ Don't know

If you selected "Yes," please describe when it was passed, or what effects, if any, it has had. Does it differ from state fair housing laws?



### 5. Concluding Questions

**1. If you have any additional comments or questions about this survey or about your local planning and zoning policies and practices, please note them in the box below.**



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## 2012 Northeast Ohio Fair Housing Survey for Government Officials

**2. The information you share with us will be anonymous and aggregated with all other responses. However, if we have questions about any of your responses, we would like to be able to contact you for clarification. As such, we ask that you please provide the following information:**

**Name:**   
**City:**   
**Email:**   
**Phone Number:**

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## **D. FAIR HOUSING FORUMS FLYERS**

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This appendix contains the flyers for the fair housing forums, in English and Spanish.

# 2013 Northeast Ohio Fair Housing Forums

Sponsor: Northeast Ohio Sustainable Communities Consortium (NEOSCC)



## You are invited to attend!

The NEOSCC is currently undertaking a study to evaluate fair housing throughout the 12 Counties of Northeast Ohio. It is known as a Regional Analysis of Impediments to Fair Housing Choice.

Listen to preliminary findings of the study. Provide your knowledge, opinions, and feelings about fair housing choice. Please offer your suggestions on how to eliminate impediments to fair housing choice - ways we can work together to further fair housing in Northeast Ohio.

***State and Federal fair housing laws prohibit discrimination in housing based on race, color, religion, sex, national origin, disability, familial status, ancestry or military status.***

### Schedule

#### March 11

- 9:00am – Summit County, Akron Urban League (President's Hall), 440 Vernon Odom Blvd., Akron
- 1:30pm – Cuyahoga County, Cuyahoga Metropolitan Housing Authority (Corporate Offices, Board Room)  
8120 Kinsman Rd., Cleveland
- 6:00pm – Cuyahoga County, Hall of La Sagrada Familia, 7719 Detroit Ave., Cleveland

#### March 12

- 9:30am – Wayne County, Wayne Metropolitan Housing Authority (Training & Conference Center),  
1273 W. Old Lincoln Way, Wooster
- 2:00pm – Medina County, City of Medina, City Hall (Multi-purpose Room), 132 North Elmwood Ave., Medina
- 6:30pm – Lorain County, Lorain County Transportation & Community Center, 40 East Ave., Elyria

#### March 13

- 9:30am – Ashtabula County, Ashtabula County Head Start (Lake Erie Room), 4510 Main Ave., Ashtabula
- 2:00pm – Lake County, Lake County Administration Bldg., 105 Main St., Painesville
- 6:30pm – Geauga County, Geauga Metropolitan Housing Authority (Community Room)  
385 Center St., Chardon

#### March 14

- 9:30am – Portage County, Portage County Regional Planning Commission, 124 N. Prospect St., Ravenna
- 2:00pm – Trumbull County, The Wean Foundation (Western Reserve Room), 147 W. Market St., Warren
- 6:30pm – Mahoning County, Covelli Centre (Community Room), 229 E. Front St., Youngstown

#### March 15

- 9:30am – Stark County, The Metropolitan Centre, 601 Cleveland Ave. N.W., Canton

For more information visit <http://vibrantneo.org/calendar/>.

***For anyone in need of special accommodations,  
please provide advance notice at least five days prior to the event  
by contacting Anthony Kobak (NEOSCC) at 330-375-2949.***

**NEOSCC**

NEOSCC and Vibrant NEO 2040 are largely funded by a highly competitive, first-of-its kind, \$4.25M federal grant from the U.S. Department of Housing and Urban Development (HUD) as part of the Partnership for Sustainable Communities Initiative. The Sustainable Communities Initiative is an interagency collaboration among HUD, the U.S. Department of Transportation, and the U.S. Environmental Protection Agency.

# 2013 Northeast Ohio Fair Housing Forum

**Patrocinador: Northeast Ohio Sostenible Consorcio Comunidades (NEOSCC)**

## Usted está invitado a asistir!

El NEOSCC está llevando a cabo un estudio para evaluar la equidad de vivienda a lo largo de los 12 condados del noreste de Ohio. Se le conoce como un análisis regional de los impedimentos para Elección de Vivienda Justa.

Escuchar a los resultados preliminares del estudio. Proporcione a su conocimiento, las opiniones y sentimientos acerca de la elección de vivienda justa. Por favor ofrezcan sus sugerencias sobre la manera de eliminar los obstáculos a la elección de vivienda justa - maneras en que podemos trabajar juntos a una vivienda más justa en el noreste de Ohio.

Las leyes estatales y federales de vivienda justa prohíben la discriminación en la vivienda por motivos de raza, color, religión, sexo, origen nacional, discapacidad, estado civil, ascendencia o situación militar.

### **Programar:**

#### 11 de marzo

- 9:00am – Summit County, Akron Urban League (President's Hall), 440 Vernon Odom Blvd., Akron
- 1:30pm – Cuyahoga County, Cuyahoga Metropolitan Housing Authority (Corporate Offices, Board Room)  
8120 Kinsman Rd., Cleveland
- 6:00pm – Cuyahoga County, Hall of La Sagrada Familia, 7719 Detroit Ave., Cleveland

#### 12 de marzo

- 9:30am – Wayne County, Wayne Metropolitan Housing Authority (Training & Conference Center),  
1273 W. Old Lincoln Way, Wooster
- 2:00pm – Medina County, City of Medina, City Hall (Multi-purpose Room), 132 North Elmwood Ave., Medina
- 6:30pm – Lorain County, Lorain County Transportation & Community Center, 40 East Ave., Elyria

#### 13 de marzo

- 9:30am – Ashtabula County, Ashtabula County Head Start (Lake Erie Room), 4510 Main Ave., Ashtabula
- 2:00pm – Lake County, Lake County Administration Bldg., 105 Main St., Painesville
- 6:30pm – Geauga County, Geauga Metropolitan Housing Authority (Community Room)  
385 Center St., Chardon

#### 14 de marzo

- 9:30am – Portage County, Portage County Regional Planning Commission, 124 N. Prospect St., Ravenna
- 2:00pm – Trumbull County, The Wean Foundation (Western Reserve Room), 147 W. Market St., Warren
- 6:30pm – Mahoning County, Covelli Centre (Community Room), 229 E. Front St., Youngstown

#### 15 de marzo

- 9:30am – Stark County, The Metropolitan Centre, 601 Cleveland Ave. N.W., Canton

Para obtener más información, visite [vibrantneo.org/calendar](http://vibrantneo.org/calendar)



***Para cualquier persona en necesidad de servicios especiales, por favor proporcione por anticipado al menos cinco días antes del evento poniéndose en contacto con Anthony Kobak (NEOSCC) al 330-375-2949.***

NEO NEOSCC vibrante y 2040 están financiados en gran parte por un mercado altamente competitivo de primera de su especie subsidio de \$ 4.25m federal de los EE.UU. Departamento de Vivienda y Desarrollo Urbano (HUD) en el marco de la Asociación para la Iniciativa de Comunidades Sostenibles. La Iniciativa de Comunidades Sostenibles es una colaboración interinstitucional entre HUD el Departamento de Transporte de EE.UU. y la Agencia de Protección Ambiental de EE.UU.





## **E. PUBLIC REVIEW AND FORMAL FAIR HOUSING PRESENTATIONS FLYERS**

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This appendix contains the English and Spanish flyers for the public review period and formal fair housing presentations.

# 2013 Northeast Ohio Fair Housing Draft Report Review and Presentations



## You are invited!

The Northeast Ohio Sustainable Communities Consortium (NEOSCC) is currently undertaking a study to evaluate fair housing throughout the 12 Counties of Northeast Ohio. It is known as a Regional Analysis of Impediments to Fair Housing Choice.

The public comment period will include on-line, in-print and presentation options for your review. Provide your knowledge, opinions, and feelings about fair housing choice.

The purpose of the comment period is to allow the public an opportunity to review and comment on the draft findings and suggested recommendations. **COMMENTS WILL BE ACCEPTED UNTIL JULY 9, 2013.** Please note that these are proposed findings and recommendations and are subject to change. All interested citizens are encouraged to attend any of the public meetings and/or forward written comments to: NEOSCC, 146 S. High Street, Suite 800, Akron, OH 44308 or [akobak@neoscc.org](mailto:akobak@neoscc.org).

***State and Federal fair housing laws prohibit discrimination in housing based on race, color, religion, sex, national origin, disability, familial status, ancestry or military status.***

### Schedule

#### On-Line or In Print Review

##### June 10 – July 9

Three-volume draft study available for public comment online at [www.vibrantneo.org](http://www.vibrantneo.org) or may be reviewed at the following locations (fees may apply for copies):

- NEOSCC, 146 S. High Street, Suite 800, Akron, OH
- Northeast Ohio Areawide Coordinating Agency, 1299 Superior Avenue, Cleveland, OH
- Stark County Regional Planning Commission, 201 3<sup>rd</sup> Street NE, Suite #201, Canton, OH
- Eastgate Regional Council of Governments, 100 East Federal Street, Suite 1000, Youngstown, OH

#### Presentations

##### June 18

- 9:00am – Mahoning County, Covelli Centre (Community Room), 229 E. Front St., Youngstown
- 11:30am - Trumbull County, The Wean Foundation (Western Reserve Room), 147 W. Market St., Warren
- 2:30pm – Lake & Geauga Counties, Mentor Municipal Center, City Council Chambers, 3<sup>rd</sup> Floor, 8500 Civic Center Blvd., Mentor
- 7:00pm – Ashtabula County, Ashtabula County Old Courthouse, Commissioners Meeting Room, 2<sup>nd</sup> Floor, 25 W. Jefferson St., Jefferson

##### June 19

- 9:00am – Portage County, Portage County Regional Planning Commission, 124 N. Prospect St., Ravenna
- 11:30am - Summit County, Akron Urban League (President's Hall), 440 Vernon Odom Blvd., Akron
- 2:30pm – Medina County, City of Medina, City Hall (Multi-purpose Room), 132 North Elmwood Ave., Medina
- 7:00pm – Stark & Wayne Counties, The Lillian Beane Center, 1711 16<sup>th</sup> St. SE, Massillon

##### June 20

- 9:00am - Lorain County, Lorain County Transportation & Community Center, 40 East Ave., Elyria
- 12:00pm – Cuyahoga County, The Castele Learning & Conference Center at Lutheran Hospital, 1730 West 25<sup>th</sup> St., Cleveland
- 2:30pm – Cuyahoga County, Cleveland Heights Community Center, All-Purpose Room, 1 Monticello Blvd., Cleveland Heights

For more information visit <http://vibrantneo.org/calendar/>.

*For anyone in need of special accommodations,  
please provide advance notice at least five days prior to the event  
by contacting Anthony Kobak (NEOSCC) at 330-375-2949.*



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# Proyecto de Informe de la Revisión y Presentaciones Feria 2013 de la Vivienda del Noreste de Ohio



## ¡Usted está invitado!

El Consorcio del noreste de Ohio de Comunidades Sustentables (NEOSCC) está llevando a cabo un estudio para evaluar la equidad de vivienda a través de los 12 condados del noreste de Ohio. Se le conoce como un análisis regional de Impedimentos para la Elección de Vivienda Justa.

El periodo de comentarios públicos incluirá un formato electrónicamente, una opción de presentación para su revisión a la impresión y proporcionará los conocimientos, opiniones y sentimientos acerca de la elección de vivienda justa.

El propósito del periodo de comentarios es permitir al público la oportunidad de revisar y comentar sobre el proyecto de conclusiones y recomendaciones sugeridas. Los COMENTARIOS serán aceptados hasta el 09 de julio 2013. Por favor, tenga en cuenta que se trata de conclusiones y recomendaciones propuestas, y están sujetas a cambios. Se anima a todos los ciudadanos interesados asistir a cualquiera de las reuniones públicas y/o someta sus comentarios escritos a: NEOSCC, 146 S. High Street, Suite 800, Akron, OH 44308 o [akobak@neoscc.org](mailto:akobak@neoscc.org).

Las leyes federales de vivienda justa establecen y prohíben la discriminación en la vivienda por motivos de raza, color, religión, sexo, origen nacional, discapacidad, estado familiar, ascendencia o situación militar.

### Programación

En línea o en formato para Imprimir

#### Junio 10 – Julio 9

Proyecto de estudio de tres volúmenes disponibles para hacer comentarios en línea público en [www.vibrantneo.org](http://www.vibrantneo.org) o puede ser revisado en los siguientes lugares (comisiones pueden solicitar copias):

- NEOSCC, 146 S. High Street, Suite 800, Akron, OH
- Agencia Coordinadora de Ohio Areawide del Noreste, 1299 Superior Avenue, Cleveland, OH
- Comisión de Stark County Regional Planning, 201 NE 3rd Street, Suite # 201, Canton, OH
- Consejo Regional de Gobiernos Eastgate, 100 Federal Street Oriental, Suite 1000, Youngstown, OH

### Presentations

#### Junio 18

- 9:00 am - Condado de Mahoning, Covelli Center (Sala de la Comunidad), 229 E. Front St., Youngstown
- 11:30 am - Condado de Trumbull, la Fundación Destete (Salon de la Western Reserve), 147 W. Market St., Warren
- 2:30 pm - Geauga Lake & Counties, Centro Municipal del Mentor, Ayuntamiento de Salas, 3rd Floor, 8500 Civic Center Blvd, Mentor.
- 7:00 pm - Condado de Ashtabula, Corte Antigua de Ashtabula, Sala de Reuniones del Comisionados, 2 º piso, 25 W. Jefferson St., Jefferson

#### Junio 19

- 9:00 am - Condado de Portage, Departamento de Comisión y Planificación Regional del Condado de Portage, 124 N. St. de la perspectiva, Ravenna
- 11:30 am - Condado de Summit, Akron Liga Urbana (Hall del Presidente), 440 Vernon Odom Blvd, Akron.
- 2:30 pm - Condado de Medina, la ciudad de Medina, City Hall (salón de usos múltiples), 132 North Elmwood Ave, Medina.
- 7:00 pm - Stark y los condados de Wayne, el Centro Lillian Beane, 1711 16th St. SE, Massillon

#### Junio 20

- 9:00 am - Condado de Lorain, Centro de Transportacion y Comunidad del Condado, 40 East Ave, Elyria.
- 12:00 - Condado de Cuyahoga, El Castele Learning & Centro de Conferencias en el Hospital Luterano, 1730 West 25th St., Cleveland
- 2:30 pm - Condado de Cuyahoga, el Centro de Comunidad de Cleveland Heights, Salon de Usos Multiples, 1 Monticello Blvd, Cleveland Heights.

Para mas informacion visite <http://vibrantneo.org/calendar/>.

Para cualquier persona en necesidad de servicios especiales, por favor proporcione una notificación anticipada al menos cinco días antes del evento poniéndose en contacto con Anthony Kobak (NEOSCC) al 330-375-2949.



