

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



**VOLUME III: TECHNICAL APPENDIX PART 1
FINAL REPORT
SEPTEMBER 20, 2013**

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

VOLUME III: TECHNICAL APPENDIX PART 1

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INTRODUCTION

A. ORGANIZATION OF THE NEOSCC REGIONAL AI

The Northeast Ohio Sustainable Communities Consortium (NEOSCC) 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).

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 III.1 on the following page, with the legend identifying the entitlement counties. The region is also segmented into six (6) housing market areas. 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 into the six housing market areas. The Volume II data is presented in a similar fashion to that of **Volume I**, but provides additional details about both the FHEA and Regional AI.

This document is the **Volume III** report. This is a rather large document comprising, printed in two parts or chapters due to its size. Volume III has segmented both quantitative and qualitative data for each entitlement, the nonentitlement areas of each county, then aggregated this information to the total for each county. All county data are summed to the housing market area, as well as each of the MPO/COG metro areas. Then the tabulated data are presented for the entire NEOSCC Region. 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 III.1 presents these areas, organized as they are presented and numbered in **Volume III**.

Map III.1
Northeast Ohio Sustainable Communities Consortium Region

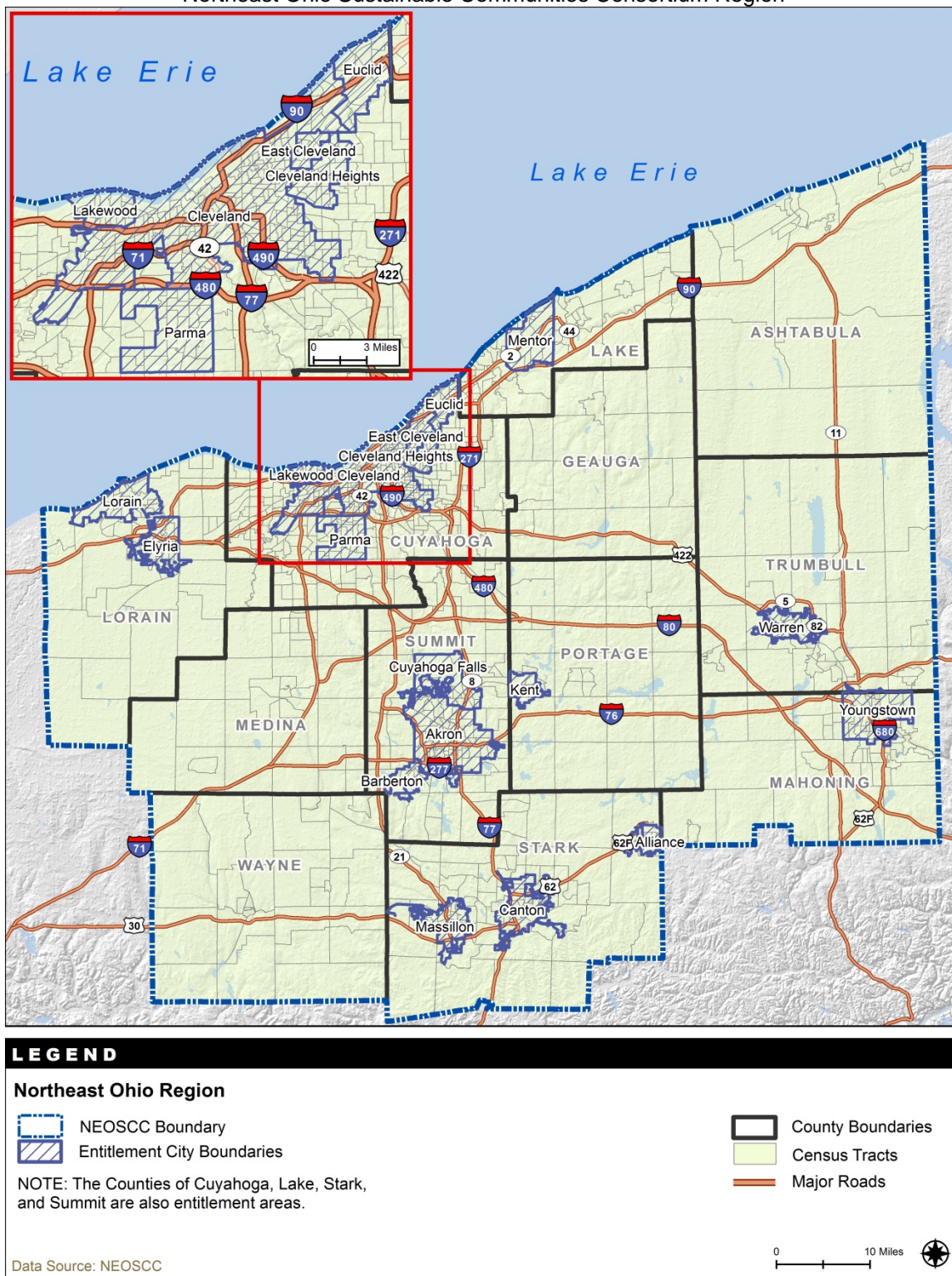


Exhibit III.1
Volume III Geographic Area Designations
 NEOSCC Region
 2013 NEOSCC Data

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

B. THE CONSISTENCY OF THE NEOSCC REGIONAL AI

For the 18 Cities and four Counties in the NEOSCC Region that have submitted an Analysis of Impediments to Fair Housing Choice to HUD, and the long list of non-entitlement areas within the NEOSCC Region that have submitted AI's to the State of Ohio, the guiding principle reported in this volume is one of unity. While impediments to fair housing choice can be reflected and expressed in many ways, nuanced in delicate manners for specific communities, the goal here was to express impediments in such ways as the Region as an entity could come together and build upon this effort. This allows the region to work more effectively toward common goals, using common terms, consistent language, and a shared vision for fair housing.

1. NORTHEAST OHIO REGION

A. CENSUS BUREAU DATA

This section contains additional data from the U.S. Census Bureau.

Table 1.A.1

Population by Age

1. Northeast Ohio Region
2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Under 5	254,547	6.5%	221,096	5.8%	-13.1%
5 to 19	831,416	21.2%	760,665	19.9%	-8.5%
20 to 24	222,473	5.7%	230,802	6.0%	3.7%
25 to 34	504,159	12.9%	438,242	11.5%	-13.1%
35 to 54	1,177,060	30.0%	1,076,417	28.2%	-8.6%
55 to 64	356,771	9.1%	505,596	13.2%	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%

Table 1.A.2

Elderly Population by Age

1. Northeast Ohio Region
2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
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%

Table 1.A.3

Population by Race and Ethnicity

1. Northeast Ohio Region
2000 & 2010 Census SF1 Data

Race	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
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	.2%	7,603	.2%	3.2%
Asian	44,616	1.1%	61,391	1.6%	37.6%
Native Hawaiian/ Pacific Islander	801	.0%	796	.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%

Table 1.A.4**Disability by Age**1. Northeast Ohio 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%
Total	234,230	12.9%	267,882	13.7%	502,112	13.3%

Table 1.A.5**Employment Status by Disability and Type: Age 18 to 64**1. Northeast Ohio Region
2010 Three-Year ACS Data

Disability Status	Population
Employed:	1,666,692
With a disability:	91,656
With a hearing difficulty	24,723
With a vision difficulty	14,686
With a cognitive difficulty	29,540
With an ambulatory difficulty	36,230
With a self-care difficulty	10,361
With an independent living difficulty	20,375
No disability	1,575,036
Unemployed:	184,991
With a disability:	24,904
With a hearing difficulty	4,266
With a vision difficulty	3,751
With a cognitive difficulty	12,622
With an ambulatory difficulty	9,254
With a self-care difficulty	2,783
With an independent living difficulty	6,618
No disability	160,087
Not in labor force:	481,743
With a disability:	140,227
With a hearing difficulty	19,301
With a vision difficulty	20,030
With a cognitive difficulty	68,299
With an ambulatory difficulty	87,158
With a self-care difficulty	33,841
With an independent living difficulty	67,801
No disability	341,516
Total	2,333,426

Table 1.A.6**Households by Income**

1. Northeast Ohio 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%
Total	1,547,523	100.0%	1,548,776	100.0%

Table 1.A.7**Poverty by Age**

1. Northeast Ohio Region

2000 Census SF3 & 2010 Five-Year ACS Data

Age	2000 Census		2010 Five-Year ACS	
	Persons in Poverty	% of Total	Persons in Poverty	% of Total
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%
Total	401,725	100.0%	519,821	100.0%
Poverty Rate	10.5%	.	13.9%	.

Table 1.A.8**Households by Year Home Built**

1. Northeast Ohio Region

2000 Census SF3 & 2010 Five-Year ACS Data

Year Built	2000 Census		2010 Five-Year ACS	
	Households	% of Total	Households	% of Total
1939 or Earlier	354,521	22.9%	337,084	21.8%
1940 to 1949	164,216	10.6%	128,425	8.3%
1950 to 1959	292,195	18.9%	284,428	18.4%
1960 to 1969	232,665	15.0%	205,759	13.3%
1970 to 1979	227,932	14.7%	216,515	14.0%
1980 to 1989	117,148	7.6%	113,905	7.4%
1990 to 1999	158,490	10.2%	151,997	9.8%
2000 to 2004	.	.	78,922	5.1%
2005 or Later	.	.	31,741	2.0%
Total	1,547,167	100.0%	1,548,776	100.0%

Table 1.A.9**Housing Units by Type**

1. Northeast Ohio Region

2000 Census SF3 & 2010 Five-Year ACS Data

Unit Type	2000 Census		2010 Five-Year ACS	
	Units	% of Total	Units	% of Total
Single-Family	1,190,838	72.1%	1,270,284	73.5%
Duplex	110,041	6.7%	106,918	6.2%
Tri- or Four-Plex	59,912	3.6%	57,655	3.3%
Apartment	253,175	15.3%	258,763	15.0%
Mobile Home	38,100	2.3%	35,126	2.0%
Boat, RV, Van, Etc.	285	.0%	282	.0%
Total	1,652,351	100.0%	1,729,028	100.0%

Table 1.A.10**Housing Units by Tenure**

1. Northeast Ohio Region

2000 & 2010 Census SF1 Data

Tenure	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
Occupied Housing Units	1,547,167	93.6%	1,557,709	89.9%	.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%
Total Housing Units	1,652,351	100.0%	1,733,494	100.0%	4.9%

Table 1.A.11**Disposition of Vacant Housing Units**

1. Northeast Ohio Region

2000 & 2010 Census SF1 Data

Disposition	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
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%	-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%

Table 1.A.12**Households by Household Size**

1. Northeast Ohio Region

2000 & 2010 Census SF1 Data

Size	2000 Census		2010 Census		% Change 00-10
	Households	% of Total	Households	% of Total	
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%	.7%

Table 1.A.13
Household Type by Tenure
 1. Northeast Ohio Region
 2000 & 2010 Census SF1 Data

Household Type	2000 Census		2010 Census		% Change 00–10
	Households	% of Total	Households	% of Total	
Family Households	1,034,880	66.9%	994,724	63.9%	-3.9%
Married-Couple Family	773,630	74.8%	706,455	71.0%	-8.7%
Owner-Occupied	671,723	86.8%	615,935	87.2%	-8.3%
Renter-Occupied	101,907	13.2%	90,520	12.8%	-11.2%
Other Family	261,250	25.2%	288,269	29.0%	10.3%
Male Householder, No Spouse	58,786	22.5%	70,728	24.5%	20.3%
Owner-Occupied	37,033	63.0%	42,553	60.2%	14.9%
Renter-Occupied	21,753	37.0%	28,175	39.8%	29.5%
Female Householder, No Spouse	202,464	77.5%	217,541	75.5%	7.4%
Owner-Occupied	104,395	51.6%	103,910	47.8%	-.5%
Renter-Occupied	98,069	48.4%	113,631	52.2%	15.9%
Non-Family Households	512,287	33.1%	562,985	36.1%	9.9%
Owner-Occupied	267,909	52.3%	299,921	53.3%	11.9%
Renter-Occupied	244,378	47.7%	263,064	46.7%	7.6%
Total	1,547,167	100.0%	1,557,709	100.0%	.7%

Table 1.A.14
Group Quarters Population
 1. Northeast Ohio Region
 2000 & 2010 Census SF1 Data

Group Quarters Type	2000 Census		2010 Census		% Change 00-10
	Population	% of Total	Population	% of Total	
Institutionalized					
Correctional Institutions	14,051	27.6%	16,482	33.8%	17.3%
Juvenile Facilities	.	.	1,906	3.9%	.
Nursing Homes	32,970	64.8%	29,634	60.8%	-10.1%
Other Institutions	3,858	7.6%	682	1.4%	-82.3%
Total	50,879	100.0%	48,704	100.0%	-4.3%
Noninstitutionalized					
College Dormitories	21,597	61.3%	26,878	67.1%	24.5%
Military Quarters	11	.0%	24	.1%	118.2%
Other Noninstitutional	13,631	38.7%	13,137	32.8%	-3.6%
Total	35,239	40.9%	40,039	45.1%	13.6%
Total Group Quarters Population	86,118	100.0%	88,743	100.0%	3.0%

Table 1.A.15
Overcrowding and Severe Overcrowding
 1. Northeast Ohio Region
 2000 Census SF3 & 2010 Five-Year ACS Data

2000 Census GPO & 2010 Five Year ACS Data							
Data Source	No Overcrowding		Overcrowding		Severe Overcrowding		Total
	Households	% of Total	Households	% of Total	Households	% of Total	
Owner							
2000 Census	1,071,409	99.1%	7,805	.7%	1,916	.2%	1,081,130
2010 ACS	1,070,482	99.4%	5,927	.6%	906	.1%	1,077,315
Renter							
2000 Census	451,835	97.0%	9,748	2.1%	4,454	1.0%	466,037
2010 ACS	462,905	98.2%	6,546	1.4%	2,010	.4%	471,461
Total							
2000 Census	1,523,244	98.5%	17,553	1.1%	6,370	.4%	1,547,167
2010 ACS	1,533,387	99.0%	12,473	.8%	2,916	.2%	1,548,776

Table 1.A.16
Households with Incomplete Plumbing Facilities
 1. Northeast Ohio Region
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Plumbing Facilities	1,541,065	1,542,078
Lacking Complete Plumbing Facilities	6,102	6,698
Total Households	1,547,167	1,548,776
Percent Lacking	.4%	.4%

Table 1.A.17
Households with Incomplete Kitchen Facilities
 1. Northeast Ohio Region
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Kitchen Facilities	1,538,711	1,534,925
Lacking Complete Kitchen Facilities	8,456	13,851
Total Households	1,547,167	1,548,776
Percent Lacking	.5%	.9%

Table 1.A.18
Cost Burden and Severe Cost Burden by Tenure
 1. Northeast Ohio Region
 2000 Census & 2010 Five-Year ACS Data

Data Source	Less Than 30%		31%-50%		Above 50%		Not Computed		Total
	Households	% of Total	Households	% of Total	Households	% of Total	Households	% of Total	
Owner With a Mortgage									
2000 Census	486,598	74.8%	108,188	16.6%	53,167	8.2%	2,447	.4%	650,400
2010 ACS	486,709	66.3%	156,740	21.4%	88,078	12.0%	2,484	.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 ACS	283,138	82.5%	35,727	10.4%	21,578	6.3%	2,861	.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 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 ACS	986,546	63.7%	294,411	19.0%	227,653	14.7%	40,166	2.6%	1,548,776

Table 1.A.19
Median Housing Costs
 1. Northeast Ohio Region
 2000 Census SF3 & 2010 Five-Year ACS Data

Housing Cost	2000 Census	2010 ACS
Median Contract Rent	\$5,338	\$6,567
Median Home Value	\$1,374,600	\$1,741,000

B. BEA DATA

This section contains additional Bureau of Economic Analysis (BEA) data that address employment and income.

Table 1.B.1
Employment by Industry
 1. Northeast Ohio Region
 Select Years 2001–2010 BEA Data

NAICS Categories	2001	2005	2006	2007	2008	2009	2010	% Change 01–10
Farm employment	15,598	13,307	13,328	13,501	12,229	12,467	12,305	-21.1%
Forestry, fishing, related activities, and other	1,325	1,762	1,734	1,058	2,238	1,228	1,658	25.1%
Mining	3,009	3,312	3,761	3,708	6,506	4,603	6,575	118.5%
Utilities	7,244	6,430	6,321	6,632	6,595	6,291	5,700	-21.3%
Construction	116,619	121,921	119,451	118,385	112,976	102,907	98,055	-15.9%
Manufacturing	343,247	289,448	285,097	274,894	265,483	225,844	225,015	-34.4%
Wholesale trade	96,560	97,030	98,462	94,673	92,988	86,845	85,007	-12.0%
Retail trade	256,367	247,187	244,766	244,155	238,911	227,244	222,821	-13.1%
Transportation and warehousing	56,763	60,815	60,219	67,497	63,727	57,799	58,929	3.8%
Information	39,483	34,470	34,638	34,551	33,448	31,006	29,538	-25.2%
Finance and insurance	107,521	106,554	105,880	107,835	108,973	112,632	113,940	6.0%
Real estate and rental and leasing	72,957	85,975	85,154	84,466	83,362	82,124	81,341	11.5%
Professional and technical services	121,679	122,829	126,524	131,611	131,795	124,981	123,250	1.3%
Management of companies and enterprises	30,875	40,348	42,221	41,078	43,227	41,637	41,195	33.4%
Administrative and waste services	132,202	138,381	141,997	144,648	141,958	131,097	136,793	3.5%
Educational services	43,893	50,960	51,552	51,847	52,931	55,391	56,553	28.8%
Health care and social assistance	251,813	268,019	274,099	281,322	286,531	291,363	294,944	17.1%
Arts, entertainment, and recreation	40,061	41,368	41,232	41,989	41,949	41,466	41,591	3.8%
Accommodation and food services	145,492	150,407	151,630	150,850	148,329	142,966	143,267	-1.5%
Other services, except public administration	121,443	120,526	119,921	120,670	119,450	116,629	114,712	-5.5%
Government and government enterprises	263,790	261,668	261,024	263,079	263,845	261,355	258,645	-2.0%
Total	2,284,649	2,279,385	2,286,338	2,295,061	2,273,686	2,177,577	2,167,846	-5.1%

Table 1.B.2
Real Earnings by Industry

1. Northeast Ohio Region
 Select Years 2001–2010 BEA Data, Real 2011 Dollars

NAICS Categories	2001	2005	2006	2007	2008	2009	2010	% Change 00–10
Farm earnings	270,384	245,912	160,858	201,790	186,610	201,800	158,116	-41.5%
Forestry, fishing, related activities, and other	45,607	39,609	38,030	21,770	42,564	19,409	24,164	-47.0%
Mining	332,541	208,004	242,057	204,313	488,193	106,596	162,837	-51.0%
Utilities	659,631	733,539	719,998	721,866	790,156	768,228	660,680	.2%
Construction	6,460,165	6,240,768	6,192,620	5,670,372	5,350,966	4,774,438	4,711,465	-27.1%
Manufacturing	23,145,071	21,042,251	20,914,748	19,952,744	19,793,102	16,191,414	17,717,122	-23.5%
Wholesale trade	6,761,709	7,102,569	7,284,385	7,210,700	7,118,407	6,407,078	6,462,696	-4.4%
Retail trade	7,866,384	7,555,972	7,330,668	7,231,500	6,831,922	6,498,594	6,515,062	-17.2%
Transportation and warehousing	2,934,160	3,423,278	3,277,022	3,490,705	3,301,533	2,901,112	3,028,146	3.2%
Information	2,288,841	2,109,881	2,076,655	2,068,305	1,970,105	1,798,789	1,736,980	-24.1%
Finance and insurance	6,887,080	6,978,323	7,108,319	6,880,200	6,237,620	6,203,712	6,131,769	-11.0%
Real estate and rental and leasing	2,087,761	2,111,231	1,835,545	1,533,749	1,831,966	1,980,572	1,854,707	-11.2%
Professional and technical services	8,183,274	8,020,989	8,205,311	8,449,552	8,903,091	8,063,769	8,139,811	-.5%
Management of companies and enterprises	2,771,937	3,851,712	4,159,551	4,243,858	4,274,781	3,956,370	4,268,952	54.0%
Administrative and waste services	3,758,082	4,133,006	4,272,602	4,489,045	4,393,224	4,037,333	4,248,891	13.1%
Educational services	1,403,083	1,607,490	1,627,754	1,602,513	1,644,752	1,695,915	1,699,006	21.1%
Health care and social assistance	12,051,600	13,256,936	13,666,376	13,526,469	14,130,783	14,455,535	14,674,469	21.8%
Arts, entertainment, and recreation	1,177,636	1,066,899	1,054,200	1,074,223	1,060,884	1,049,391	1,077,183	-8.5%
Accommodation and food services	2,769,964	2,846,016	2,816,370	2,887,050	2,760,321	2,669,123	2,804,059	1.2%
Other services, except public administration	4,007,427	3,989,329	3,880,843	3,859,794	3,667,070	3,515,988	3,561,626	-11.1%
Government and government enterprises	14,760,759	15,807,679	15,507,445	15,536,570	15,658,183	15,873,815	15,894,940	7.7%
Total	111,360,353	113,308,408	113,418,155	111,798,446	111,890,549	104,037,623	106,319,701	-4.5%

Table 1.B.3
Real Earnings Per Job by Industry
 1. Northeast Ohio Region
 Select Years 2001–2010 BEA Data, 1,000's of Real 2011 Dollars

NAICS Categories	2001	2005	2006	2007	2008	2009	2010	% Change 00–10
Farm earnings	17,335	18,480	12,069	14,946	15,260	16,187	12,850	-25.9%
Forestry, fishing, related activities, and other	34,420	22,480	21,932	20,577	19,019	15,805	14,574	-57.7%
Mining	110,516	62,803	64,360	55,101	75,037	23,158	24,766	-77.6%
Utilities	91,059	114,081	113,906	108,846	119,811	122,115	115,909	27.3%
Construction	55,395	51,187	51,842	47,898	47,364	46,396	48,049	-13.3%
Manufacturing	67,430	72,698	73,360	72,583	74,555	71,693	78,738	16.8%
Wholesale trade	70,026	73,200	73,982	76,164	76,552	73,776	76,025	8.6%
Retail trade	30,684	30,568	29,950	29,618	28,596	28,597	29,239	-4.7%
Transportation and warehousing	51,691	56,290	54,418	51,716	51,807	50,193	51,386	-.6%
Information	57,970	61,209	59,953	59,862	58,901	58,014	58,805	1.4%
Finance and insurance	64,053	65,491	67,136	63,803	57,240	55,079	53,816	-16.0%
Real estate and rental and leasing	28,616	24,556	21,556	18,158	21,976	24,117	22,802	-20.3%
Professional and technical services	67,253	65,302	64,852	64,201	67,553	64,520	66,043	-1.8%
Management of companies and enterprises	89,779	95,462	98,519	103,312	98,891	95,021	103,628	15.4%
Administrative and waste services	28,427	29,867	30,089	31,034	30,947	30,797	31,061	9.3%
Educational services	31,966	31,544	31,575	30,908	31,074	30,617	30,043	-6.0%
Health care and social assistance	47,859	49,463	49,859	48,082	49,317	49,613	49,753	4.0%
Arts, entertainment, and recreation	29,396	25,790	25,568	25,583	25,290	25,307	25,899	-11.9%
Accommodation and food services	19,039	18,922	18,574	19,139	18,609	18,670	19,572	2.8%
Other services, except public administration	32,998	33,099	32,362	31,986	30,700	30,147	31,048	-5.9%
Government and government enterprises	55,956	60,411	59,410	59,057	59,346	60,737	61,455	9.8%
Average	48,743	49,710	49,607	48,713	49,211	47,777	49,044	.62%

Table 1.B.4
Total Employment and Real Personal Income
 1. Northeast Ohio Region
 1969–2010 BEA Data, 2011 Dollars

Year	1,000s of 2011 Dollars						Per Capita Income	Total Employment	Real Average Earnings Per Job
	Earnings	Social Security Contributions	Residents Adjustments	Dividends, Interest, Rents	Transfer Payments	Personal Income			
1969	72,931,365	4,968,452	-742,360	10,512,059	5,631,603	83,364,215	20,497	1,836,900	39,704
1970	70,891,660	4,739,489	-705,625	10,747,431	6,311,047	82,505,024	20,150	1,818,576	38,982
1971	70,126,226	4,812,519	-708,633	10,893,001	7,145,860	82,643,935	20,171	1,774,429	39,520
1972	73,506,616	5,318,552	-767,272	11,039,453	7,576,667	86,036,912	21,150	1,801,768	40,797
1973	78,076,950	6,542,190	-871,710	11,458,994	8,297,154	90,419,197	22,300	1,876,734	41,603
1974	77,867,468	6,725,432	-898,584	11,972,347	8,996,915	91,212,713	22,583	1,910,026	40,768
1975	73,024,284	6,127,012	-830,332	11,611,317	10,391,148	88,069,405	21,915	1,839,710	39,693
1976	76,261,767	6,498,861	-899,005	11,700,732	10,536,863	91,101,497	22,796	1,854,765	41,117
1977	80,815,763	6,874,847	-968,049	12,193,495	10,352,176	95,518,537	23,960	1,905,601	42,410
1978	84,071,307	7,393,248	-983,814	12,895,562	10,447,051	99,036,857	24,886	1,961,348	42,864
1979	84,770,904	7,762,446	-965,683	13,647,005	10,933,389	100,623,169	25,450	1,982,649	42,756
1980	80,430,869	7,311,494	-860,091	15,280,651	12,728,369	100,268,304	25,426	1,935,694	41,551
1981	78,721,106	7,657,665	-931,731	17,246,459	12,831,953	100,210,122	25,533	1,904,551	41,333
1982	73,824,725	7,268,039	-806,973	18,212,736	14,151,303	98,113,752	25,118	1,828,109	40,383
1983	73,871,849	7,424,878	-832,306	18,944,467	14,555,555	99,114,687	25,465	1,802,772	40,977
1984	78,289,092	8,081,752	-906,168	20,694,563	14,456,309	104,452,044	26,935	1,863,097	42,021
1985	80,185,815	8,421,638	-931,682	21,238,530	14,906,743	106,977,768	27,733	1,894,474	42,326
1986	81,153,441	8,801,335	-896,635	21,373,974	15,519,373	108,348,817	28,250	1,923,688	42,186
1987	83,030,464	9,015,193	-919,671	21,093,556	15,706,084	109,895,241	28,740	1,964,895	42,257
1988	87,138,309	9,684,380	-991,925	21,645,374	15,876,664	113,984,043	29,849	2,009,908	43,354
1989	88,404,722	9,951,180	-994,990	23,159,945	16,349,038	116,967,534	30,600	2,049,110	43,143
1990	89,188,258	10,250,732	-996,038	24,002,575	17,500,987	119,445,050	31,222	2,069,522	43,096
1991	87,752,671	10,284,329	-993,504	23,206,279	18,044,466	117,725,582	30,586	2,055,429	42,693
1992	90,802,790	10,564,973	-1,126,429	22,479,696	19,192,588	120,783,671	31,183	2,043,307	44,439
1993	92,671,511	10,901,312	-1,221,391	22,622,580	19,577,170	122,748,558	31,541	2,076,795	44,622
1994	96,948,840	11,482,885	-1,426,573	23,260,224	19,841,732	127,141,337	32,570	2,130,491	45,505
1995	98,648,003	11,806,366	-1,339,248	24,160,801	20,486,716	130,149,906	33,265	2,184,069	45,167
1996	99,452,259	11,856,441	-1,218,508	25,249,082	20,772,128	132,398,520	33,758	2,215,149	44,896
1997	102,435,284	11,948,892	-1,278,144	26,671,602	21,010,567	136,890,416	34,899	2,250,536	45,516
1998	107,351,442	12,103,658	-1,336,650	28,581,538	21,054,151	143,546,823	36,606	2,273,924	47,210
1999	110,716,260	12,356,982	-1,333,179	27,653,115	21,331,479	146,010,692	37,243	2,302,023	48,095
2000	113,404,845	12,192,573	-1,325,566	28,110,225	22,122,503	150,119,435	38,316	2,323,488	48,808
2001	111,360,353	12,002,397	-1,329,423	26,253,109	23,401,935	147,683,578	37,761	2,284,649	48,743
2002	111,065,008	11,657,471	-1,302,285	24,725,206	24,417,969	147,248,426	37,724	2,250,545	49,350
2003	113,217,248	11,927,470	-1,349,037	22,803,286	24,986,785	147,730,811	37,906	2,247,645	50,371
2004	114,632,859	12,299,991	-1,336,544	22,157,538	25,265,749	148,419,612	38,187	2,264,144	50,630
2005	113,308,408	12,224,060	-1,309,581	22,295,300	25,674,100	147,744,167	38,156	2,279,385	49,710
2006	113,418,155	12,365,425	-1,288,193	24,320,263	26,153,491	150,238,292	38,953	2,286,338	49,607
2007	111,798,446	12,249,730	-1,237,234	25,971,533	26,961,323	151,244,337	39,325	2,295,061	48,713
2008	111,890,549	12,466,238	-1,167,558	26,963,174	28,375,948	153,595,875	40,043	2,273,686	49,211
2009	104,037,623	11,917,051	-1,045,971	21,677,611	31,612,125	144,364,337	37,711	2,177,577	47,777
2010	106,319,701	12,043,534	-1,066,478	21,850,060	32,505,409	147,565,158	38,649	2,167,846	49,044

C. BLS DATA

This section contains Bureau of Labor Statistics (BLS) data that address employment and income.

Table 1.C.1
Labor Force Statistics
1. Northeast Ohio Region
1990–2011 BLS Data

Year	Labor Force	Employment	Unemployment	Unemployment Rate	Statewide Unemployment Rate
1990	1,879,877	1,767,942	111,935	6.0%	5.7%
1991	1,869,525	1,741,236	128,289	6.9%	6.6%
1992	1,897,504	1,746,391	151,113	8.0%	7.4%
1993	1,908,012	1,771,118	136,894	7.2%	6.7%
1994	1,932,053	1,809,215	122,838	6.4%	5.6%
1995	1,942,396	1,838,877	103,519	5.3%	4.9%
1996	1,957,081	1,856,984	100,097	5.1%	5.0%
1997	1,975,038	1,880,973	94,065	4.8%	4.6%
1998	1,983,554	1,896,108	87,446	4.4%	4.3%
1999	1,997,009	1,909,332	87,677	4.4%	4.3%
2000	2,001,253	1,919,406	81,847	4.1%	4.0%
2001	2,001,395	1,909,349	92,046	4.6%	4.4%
2002	1,998,504	1,883,599	114,905	5.7%	5.7%
2003	2,001,189	1,876,009	125,180	6.3%	6.2%
2004	1,994,780	1,871,258	123,522	6.2%	6.1%
2005	1,995,642	1,877,960	117,682	5.9%	5.9%
2006	2,000,276	1,889,345	110,931	5.5%	5.4%
2007	2,006,899	1,888,499	118,400	5.9%	5.6%
2008	2,007,021	1,873,003	134,018	6.7%	6.5%
2009	1,988,906	1,793,516	195,390	9.8%	10.1%
2010	1,973,475	1,783,748	189,727	9.6%	10.0%
2011	1,961,552	1,799,453	162,099	8.3%	8.6%

D. HMDA DATA

The Home Mortgage Disclosure Act (HMDA) requires both depository and non-depository lenders to collect and publicly disclose information about housing-related loans and loan applications.¹ The information presented in this section presents detailed HMDA data, including denial rates and predatory lending including high annual percentage rate (APR) loans.

Table 1.D.1
Purpose of Loan by Year
 1. Northeast Ohio Region
 2004–2011 HMDA Data

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

Table 1.D.2
Occupancy Status for Home Purchase Loan Applications
 1. Northeast Ohio Region
 2004–2011 HMDA Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	Total
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
Total	120,239	138,490	131,078	88,407	59,703	55,214	48,614	45,466	687,211

Table 1.D.3
Owner-Occupied Home Purchase Loan Applications by Loan Type
 1. Northeast Ohio Region
 2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Conventional	93,410	109,154	102,818	66,846	29,934	21,125	18,867	19,371	461,525
FHA - Insured	11,422	10,145	8,637	8,991	22,338	28,177	24,412	19,928	134,050
VA - Guaranteed	1,559	1,653	1,428	1,360	1,882	2,211	2,079	2,286	14,458
Rural Housing Service or Farm Service Agency	126	112	82	179	444	1,100	885	1,182	4,110
Total	106,517	121,064	112,965	77,376	54,598	52,613	46,243	42,767	614,143

¹ Data are considered “raw” because they contain entry errors and incomplete loan applications. Starting in 2004, the HMDA data made substantive changes in reporting. It modified the way it handled Hispanic data, loan interest rates, and the reporting of multifamily loan applications.

DENIAL RATES

Table 1.D.4
Loan Applications by Action Taken
 1. Northeast Ohio 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
Total	106,517	121,064	112,965	77,376	54,598	52,613	46,243	42,767	614,143
Denial Rate	14.7%	17.5%	20.0%	18.5%	15.8%	12.7%	13.4%	14.0%	16.5%

Table 1.D.5
Denial Rates by Gender of Applicant
 1. Northeast Ohio 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%
Average	14.5%	18.9%	31.9%	16.8%	16.5%

Table 1.D.6
Loan Applications by Selected Action Taken by Gender of Applicant
 1. Northeast Ohio Region
 2004–2011 HMDA Data

Gender		2004	2005	2006	2007	2008	2009	2010	2011	Total
Male	Originated	41,388	44,075	38,174	27,862	19,408	17,288	15,542	14,092	217,829
	Denied	5,972	7,860	7,949	5,276	3,298	2,347	2,176	2,104	36,982
	Denial Rate	12.6%	15.1%	17.2%	15.9%	14.5%	12.0%	12.3%	13.0%	14.5%
Female	Originated	18,287	20,350	18,245	12,397	9,309	8,496	7,290	6,386	100,760
	Denied	3,591	5,182	5,672	3,512	1,923	1,276	1,264	1,109	23,529
	Denial Rate	16.4%	20.3%	23.7%	22.1%	17.1%	13.1%	14.8%	14.8%	18.9%
Not Available	Originated	1,236	1,760	1,820	1,223	979	851	1,012	993	9,874
	Denied	950	964	933	645	342	244	249	292	4,619
	Denial Rate	43.5%	35.4%	33.9%	34.5%	25.9%	22.3%	19.7%	22.7%	31.9%
Not Applicable	Originated	17	18	15	16	15	5	3	5	94
	Denied	2	4	1	4	5	0	1	2	19
	Denial Rate	10.5%	18.2%	6.3%	20.0%	25.0%	.0%	25.0%	28.6%	16.8%
Total	Originated	60,928	66,203	58,254	41,498	29,711	26,640	23,847	21,476	328,557
	Denied	10,515	14,010	14,555	9,437	5,568	3,867	3,690	3,507	65,149
	Denial Rate	14.7%	17.5%	20.0%	18.5%	15.8%	12.7%	13.4%	14.0%	16.5%

Table 1.D.7
Denial Rates by Race/Ethnicity of Applicant
 1. Northeast Ohio Region
 2004–2011 HMDA Data

Race/Ethnicity	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	25.0%	32.8%	28.0%	27.1%	28.1%	10.1%	18.9%	25.8%	25.8%
Asian	9.5%	10.7%	16.0%	12.8%	13.5%	16.2%	12.3%	15.1%	12.9%
Black	25.5%	32.4%	41.2%	41.8%	32.3%	23.2%	23.4%	26.6%	33.6%
White	11.6%	13.7%	14.5%	13.9%	13.1%	11.2%	12.0%	12.2%	13.0%
Not Available	35.0%	31.2%	35.7%	34.2%	26.4%	21.1%	21.1%	23.3%	30.9%
Not Applicable	16.7%	18.2%	5.6%	23.5%	11.8%	0.0%	0.0%	28.6%	15.9%
Average	14.7%	17.5%	20.0%	18.5%	15.8%	12.7%	13.4%	14.0%	16.5%
Non-Hispanic	13.1%	15.9%	18.5%	17.1%	15.0%	12.0%	12.6%	13.2%	15.3%
Hispanic	19.5%	24.1%	23.7%	26.2%	18.8%	15.0%	19.7%	16.7%	21.6%

Table 1.D.8
Loan Applications by Selected Action Taken by Race/Ethnicity of Applicant
 1. Northeast Ohio Region
 2004–2011 HMDA Data

Race		2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Originated	144	135	131	94	69	89	60	46	768
	Denied	48	66	51	35	27	10	14	16	267
	Denial Rate	25.0%	32.8%	28.0%	27.1%	28.1%	18.9%	18.9%	25.8%	25.8%
Asian	Originated	1,075	1,109	951	761	553	523	484	410	5,866
	Denied	113	133	181	112	86	101	68	73	867
	Denial Rate	9.5%	10.7%	16.0%	12.8%	13.5%	16.2%	12.3%	15.1%	12.9%
Black	Originated	5,451	6,623	6,194	3,462	2,214	1,668	1,438	1,126	28,176
	Denied	1,866	3,179	4,346	2,482	1,056	503	440	408	14,280
	Denial Rate	25.5%	32.4%	41.2%	41.8%	32.3%	23.2%	23.4%	26.6%	33.6%
White	Originated	50,850	53,707	47,497	34,944	25,233	22,988	20,344	18,422	273,985
	Denied	6,691	8,540	8,056	5,649	3,813	2,888	2,762	2,562	40,961
	Denial Rate	11.6%	13.7%	14.5%	13.9%	13.1%	11.2%	12.0%	12.2%	13.0%
Not Available	Originated	3,293	4,611	3,464	2,224	1,627	1,367	1,518	1,467	19,571
	Denied	1,774	2,088	1,920	1,155	584	365	406	446	8,738
	Denial Rate	35.0%	31.2%	35.7%	34.2%	26.4%	21.1%	21.1%	23.3%	30.9%
Not Applicable	Originated	115	18	17	13	15	5	3	5	191
	Denied	23	4	1	4	2	0	0	2	36
	Denial Rate	35.0%	31.2%	35.7%	34.2%	26.4%	21.1%	21.1%	23.3%	15.9%
Total	Originated	60,928	66,203	58,254	41,498	29,711	26,640	23,847	21,476	328,557
	Denied	10,515	14,010	14,555	9,437	5,568	3,867	3,690	3,507	65,149
	Denial Rate	14.7%	17.5%	20.0%	18.5%	15.8%	12.7%	13.4%	14.0%	16.5%
Non-Hispanic	Originated	50,726	59,726	53,528	38,413	27,398	24,681	21,887	19,640	295,999
	Denied	7,624	11,328	12,172	7,913	4,828	3,374	3,157	2,974	53,370
	Denial Rate	13.1%	15.9%	18.5%	17.1%	15.0%	12.0%	12.6%	13.2%	15.3%
Hispanic	Originated	1,246	1,322	1,263	864	606	551	462	438	6,752
	Denied	302	419	393	306	140	97	113	88	1,858
	Denial Rate	19.5%	24.1%	23.7%	26.2%	18.8%	15.0%	19.7%	16.7%	21.6%

Table 1.D.9
Loan Applications by Reason for Denial
 1. Northeast Ohio Region
 2004–2011 HMDA Data

Denial Reason	2004	2005	2006	2007	2008	2009	2010	2011	Total
Debt-to-Income Ratio	1,320	1,625	1,600	1,441	977	799	834	704	9,300
Employment History	136	174	202	161	113	95	116	106	1,103
Credit History	2,256	2,664	2,589	2,046	1,241	907	919	781	13,403
Collateral	803	1,106	1,257	994	949	753	693	631	7,186
Insufficient Cash	208	231	245	188	119	89	108	88	1,276
Unverifiable Information	271	469	567	501	239	121	109	105	2,382
Credit Application Incomplete	889	1,052	900	961	462	294	293	453	5,304
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
Total	10,515	14,010	14,555	9,437	5,568	3,867	3,690	3,507	65,149

Table 1.D.10
Denial Rates by Income of Applicant
 1. Northeast Ohio 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%
Total	14.7%	17.5%	20.0%	18.5%	15.8%	12.7%	13.4%	14.0%	16.5%

Table 1.D.11
Denial Rates of Loans by Race/Ethnicity and Income of Applicant
 1. Northeast Ohio Region
 2004–2011 HMDA Data

Race	<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	Above \$75K	Data Missing	Average
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%
Average	50.7%	27.2%	18.8%	15.8%	12.9%	9.9%	21.3%	16.5%
Non-Hispanic Ethnicity	49.9%	25.4%	17.4%	14.6%	12.0%	9.3%	16.9%	15.3%
Hispanic (Ethnicity)	48.1%	29.0%	22.5%	18.4%	17.5%	12.4%	23.6%	21.6%

Table 1.D.12
Loan Applications by Reason for Denial by Race/Ethnicity of Applicant

1. Northeast Ohio Region
 2004–2011 HMDA Data

Denial Reason	American Indian	Asian	Black	White	Not Available	Not Applicable	Total	Hispanic (Ethnicity)
Debt-to-Income Ratio	39	173	1,875	6,273	937	3	9,300	297
Employment History	4	30	160	826	83	0	1,103	44
Credit History	70	158	3,075	8,546	1,551	3	13,403	418
Collateral	25	104	1,237	5,068	746	6	7,186	202
Insufficient Cash	7	18	226	876	149	0	1,276	38
Unverifiable Information	9	51	616	1,433	268	5	2,382	64
Credit Application Incomplete	17	84	886	3,599	714	4	5,304	112
Mortgage Insurance Denied	2	3	16	91	8	0	120	7
Other	37	129	2,742	6,213	1,563	8	10,692	301
Missing	57	117	3,447	8,036	2,719	7	14,383	375
Total	267	867	14,280	40,961	8,738	36	65,149	1,858
% Missing	21.3%	13.5%	24.1%	19.6%	31.1%	19.4%	22.1%	20.2%

Table 1.D.13
Loan Applications by Income of Applicant: Originated and Denied

1. Northeast Ohio Region
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Loan Originated	352	327	372	218	166	200	175	108	1,918
	Application Denied	318	385	330	238	176	205	177	145	1,974
	Denial Rate	47.5%	54.1%	47.0%	52.2%	51.5%	50.6%	50.3%	57.3%	50.7%
\$15,001–\$30,000	Loan Originated	7,669	7,665	6,267	4,613	3,333	3,594	3,019	2,602	38,762
	Application Denied	2,509	3,242	3,127	2,056	1,193	843	838	708	14,516
	Denial Rate	24.7%	29.7%	33.3%	30.8%	26.4%	19.0%	21.7%	21.4%	27.2%
\$30,001–\$45,000	Loan Originated	14,402	15,682	13,047	9,017	6,952	6,570	5,192	4,556	75,418
	Application Denied	2,910	3,788	3,995	2,516	1,533	972	914	856	17,484
	Denial Rate	16.8%	19.5%	23.4%	21.8%	18.1%	12.9%	15.0%	15.8%	18.8%
\$45,001–\$60,000	Loan Originated	12,095	13,172	11,239	7,917	5,834	5,236	4,424	3,833	63,750
	Application Denied	1,896	2,599	2,828	1,694	1,076	678	588	570	11,929
	Denial Rate	13.6%	16.5%	20.1%	17.6%	15.6%	11.5%	11.7%	12.9%	15.8%
\$60,001–\$75,000	Loan Originated	8,139	8,891	7,502	5,371	3,788	3,274	2,912	2,659	42,536
	Application Denied	921	1,376	1,414	973	515	386	345	370	6,300
	Denial Rate	10.2%	13.4%	15.9%	15.3%	12.0%	10.5%	10.6%	12.2%	12.9%
Above \$75,000	Loan Originated	15,974	18,525	17,769	13,648	9,376	7,527	7,892	7,505	98,216
	Application Denied	1,355	2,076	2,430	1,741	1,008	703	710	773	10,796
	Denial Rate	7.8%	10.1%	12.0%	11.3%	9.7%	8.5%	8.3%	9.3%	9.9%
Data Missing	Loan Originated	2,297	1,941	2,058	714	262	239	233	213	7,957
	Application Denied	606	544	431	219	67	80	118	85	2,150
	Denial Rate	20.9%	21.9%	17.3%	23.5%	20.4%	25.1%	33.6%	28.5%	21.3%
Total	Loan Originated	60,928	66,203	58,254	41,498	29,711	26,640	23,847	21,476	328,557
	Application Denied	10,515	14,010	14,555	9,437	5,568	3,867	3,690	3,507	65,149
	Denial Rate	14.7%	17.5%	20.0%	18.5%	15.8%	12.7%	13.4%	14.0%	16.5%

Table 1.D.14
Loan Applications by Income and Race/Ethnicity of Applicant: Originated and Denied
 1. Northeast Ohio Region
 2004–2011 HMDA Data

Race		<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	> \$75K	Data Missing	Total
American Indian	Loan Originated	6	93	168	143	88	249	21	768
	Application Denied	6	76	62	39	29	47	8	267
	Denial Rate	50.0%	45.0%	27.0%	21.4%	24.8%	15.9%	27.6%	25.8%
Asian	Loan Originated	22	443	872	902	727	2,729	171	5,866
	Application Denied	26	145	166	149	97	260	24	867
	Denial Rate	54.2%	24.7%	16.0%	14.2%	11.8%	8.7%	12.3%	12.9%
Black	Loan Originated	206	5,425	8,810	5,839	3,041	4,396	459	28,176
	Application Denied	340	3,577	4,315	2,695	1,212	1,844	297	14,280
	Denial Rate	62.3%	39.7%	32.9%	31.6%	28.5%	29.6%	39.3%	33.6%
White	Loan Originated	1,472	30,556	61,360	53,323	36,325	84,218	6,731	273,985
	Application Denied	1,352	8,809	10,647	7,538	4,191	7,260	1,164	40,961
	Denial Rate	47.9%	22.4%	14.8%	12.4%	10.3%	7.9%	14.7%	13.0%
Not Available	Loan Originated	211	2,222	4,185	3,521	2,342	6,538	552	19,571
	Application Denied	249	1,903	2,287	1,499	768	1,384	648	8,738
	Denial Rate	54.1%	46.1%	35.3%	29.9%	24.7%	17.5%	54.0%	30.9%
Not Applicable	Loan Originated	1	23	23	22	13	86	23	191
	Application Denied	1	6	7	9	3	1	9	36
	Denial Rate	50.0%	20.7%	23.3%	29.0%	18.8%	1.1%	28.1%	15.9%
Total	Loan Originated	1,918	38,762	75,418	63,750	42,536	98,216	7,957	328,557
	Application Denied	1,974	14,516	17,484	11,929	6,300	10,796	2,150	65,149
	Denial Rate	50.7%	27.2%	18.8%	15.8%	12.9%	9.9%	21.3%	16.5%
Non-Hispanic Ethnicity	Loan Originated	1,608	34,510	68,250	57,777	38,655	88,260	6,939	295,999
	Application Denied	1,600	11,778	14,343	9,909	5,285	9,048	1,407	53,370
	Denial Rate	49.9%	25.4%	17.4%	14.6%	12.0%	9.3%	16.9%	15.3%
Hispanic (Ethnicity)	Loan Originated	98	1,420	1,760	1,236	683	1,377	178	6,752
	Application Denied	91	581	512	279	145	195	55	1,858
	Denial Rate	48.1%	29.0%	22.5%	18.4%	17.5%	12.4%	23.6%	21.6%

PREDATORY LENDING

Table 1.D.15
Originated Owner-Occupied Loans by HAL Status
 1. Northeast Ohio 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
Total	60,928	66,203	58,254	41,498	29,711	26,640	23,847	21,476	328,557
Percent HAL	13.3%	25.1%	24.9%	13.1%	10.7%	6.5%	.8%	.6%	15.2%

Table 1.D.16
Loans by Loan Purpose by HAL Status
 1. Northeast Ohio Region
 2004–2011 HMDA Data

Loan Purpose		2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	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
	Percent HAL	13.3%	25.1%	24.9%	13.1%	10.7%	6.5%	.8%	.6%	15.2%
Home Improvement	Other	7,682	8,556	9,159	7,926	5,595	2,959	2,735	2,955	47,567
	HAL	2,055	2,573	2,523	1,954	1,032	580	267	166	11,150
	Percent HAL	21.1%	23.1%	21.6%	19.8%	15.6%	16.4%	8.9%	5.3%	19.0%
Refinancing	Other	66,071	48,933	37,899	30,994	25,116	49,649	51,179	43,478	353,319
	HAL	14,624	21,154	18,375	8,633	4,154	2,862	378	335	70,515
	Percent HAL	18.1%	30.2%	32.7%	21.8%	14.2%	5.5%	.7%	.8%	16.6%
Total	Other	126,598	107,042	90,797	74,963	57,249	77,527	77,581	67,785	679,542
	HAL	24,762	40,377	35,413	16,042	3,173	1,721	180	124	131,566
	Percent HAL	16.4%	27.4%	28.1%	17.6%	12.7%	6.2%	1.1%	.9%	16.2%

Table 1.D.17
HALs Originated by Race of Borrower
 1. Northeast Ohio 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
Total	8,083	16,650	14,515	5,455	3,173	1,721	180	124	49,901
Hispanic (Ethnicity)	206	400	409	167	92	51	2	3	1,330

Table 1.D.18
Rate of HALs Originated by Race/Ethnicity of Borrower
 1. Northeast Ohio 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%
Average	13.3%	25.1%	24.9%	13.1%	10.7%	6.5%	0.8%	0.6%	15.2%
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%

Table 1.D.19
Loans by HAL Status by Race/Ethnicity of Borrower
 1. Northeast Ohio Region
 2004–2011 HMDA Data

Race	Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Other	125	97	92	81	59	85	60	46	645
	HAL	19	38	39	13	10	4	0	0	123
	Percent HAL	13.2%	28.1%	29.8%	13.8%	14.5%	4.5%	.0%	.0%	16.0%
Asian	Other	1,010	987	830	711	522	506	483	410	5,459
	HAL	65	122	121	50	31	17	1	0	407
	Percent HAL	6.0%	11.0%	12.7%	6.6%	5.6%	3.3%	.2%	.0%	6.9%
Black	Other	3,757	3,028	2,482	2,265	1,838	1,496	1,427	1,122	17,415
	HAL	1,694	3,595	3,712	1,197	376	172	11	4	10,761
	Percent HAL	31.1%	54.3%	59.9%	34.6%	17.0%	10.3%	.8%	.4%	38.2%
White	Other	45,580	43,307	38,248	31,159	22,656	21,522	20,183	18,306	240,961
	HAL	5,270	10,400	9,249	3,785	2,577	1,466	161	116	33,024
	Percent HAL	10.4%	19.4%	19.5%	10.8%	10.2%	6.4%	0.8%	0.6%	12.1%
Not Available	Other	2,272	2,116	2,074	1,814	1,448	1,306	1,512	1,463	14,005
	HAL	1,021	2,495	1,390	410	179	61	6	4	5,566
	Percent HAL	31.0%	54.1%	40.1%	18.4%	11.0%	4.5%	.4%	.3%	28.4%
Not Applicable	Other	101	18	13	13	15	4	2	2	171
	HAL	14	0	4	0	0	1	1	0	20
	Percent HAL	12.2%	.0%	23.5%	.0%	.0%	20.0%	33.3%	.0%	10.0%
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
	Percent HAL	13.3%	25.1%	24.9%	13.1%	10.7%	6.5%	.8%	.6%	15.2%
Non-Hispanic Ethnicity	Other	44,401	46,223	40,766	33,504	24,522	23,079	21,719	19,527	253,741
	HAL	6,325	13,503	12,762	4,909	2,876	1,602	168	113	42,258
	Percent HAL	12.5%	22.6%	23.8%	12.8%	10.5%	6.5%	.8%	.6%	14.3%
Hispanic (Ethnicity)	Other	1,040	922	854	697	514	500	460	435	5,422
	HAL	206	400	409	167	92	51	2	3	1,330
	Percent HAL	16.5%	30.3%	32.4%	19.3%	15.2%	9.3%	.4%	.7%	19.7%

Table 1.D.20
Rates of HALs by Income of Borrower
 1. Northeast Ohio Region
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Average
\$15,000 or Below	17.6%	26.0%	25.5%	25.2%	20.5%	13.0%	1.7%	.9%	18.8%
\$15,001–\$30,000	22.0%	37.1%	37.1%	22.9%	19.3%	10.0%	1.5%	1.5%	23.2%
\$30,001–\$45,000	18.1%	33.0%	31.9%	17.3%	14.1%	8.3%	1.0%	.7%	20.0%
\$45,001–\$60,000	15.0%	28.8%	27.9%	13.8%	10.9%	6.3%	.7%	.4%	17.0%
\$60,001–\$75,000	10.1%	21.2%	22.7%	11.2%	9.0%	5.4%	.4%	.4%	13.1%
Above \$75,000	5.8%	13.1%	13.6%	6.7%	5.7%	3.7%	0.4%	.4%	7.7%
Data Missing	7.2%	21.7%	32.8%	23.8%	4.6%	2.1%	.4%	.0%	18.2%
Average	13.3%	25.1%	24.9%	13.1%	10.7%	6.5%	.8%	.6%	15.2%

Table 1.D.21
Loans by HAL Status by Income of Borrower
 1. Northeast Ohio Region
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Other	290	242	277	163	132	174	172	107	1,557
	HAL	62	85	95	55	34	26	3	1	361
	Percent HAL	17.6%	26.0%	25.5%	25.2%	20.5%	13.0%	1.7%	.9%	18.8%
\$15,001–\$30,000	Other	5,981	4,821	3,945	3,556	2,691	3,233	2,975	2,564	29,766
	HAL	1,688	2,844	2,322	1,057	642	361	44	38	8,996
	Percent HAL	22.0%	37.1%	37.1%	22.9%	19.3%	10.0%	1.5%	1.5%	23.2%
\$30,001–\$45,000	Other	11,801	10,501	8,881	7,459	5,975	6,024	5,140	4,526	60,307
	HAL	2,601	5,181	4,166	1,558	977	546	52	30	15,111
	Percent HAL	18.1%	33.0%	31.9%	17.3%	14.1%	8.3%	1.0%	.7%	20.0%
\$45,001–\$60,000	Other	10,277	9,373	8,102	6,822	5,197	4,907	4,392	3,817	52,887
	HAL	1,818	3,799	3,137	1,095	637	329	32	16	10,863
	Percent HAL	15.0%	28.8%	27.9%	13.8%	10.9%	6.3%	.7%	.4%	17.0%
\$60,001–\$75,000	Other	7,315	7,004	5,801	4,769	3,448	3,097	2,899	2,648	36,981
	HAL	824	1,887	1,701	602	340	177	13	11	5,555
	Percent HAL	10.1%	21.2%	22.7%	11.2%	9.0%	5.4%	.4%	.4%	13.1%
Above \$75,000	Other	15,049	16,093	15,351	12,730	8,845	7,250	7,857	7,477	90,652
	HAL	925	2,432	2,418	918	531	277	35	28	7,564
	Percent HAL	5.8%	13.1%	13.6%	6.7%	5.7%	3.7%	.4%	.4%	7.7%
Data Missing	Other	2,132	1,519	1,382	544	250	234	232	213	6,506
	HAL	165	422	676	170	12	5	1	0	1,451
	Percent HAL	7.2%	21.7%	32.8%	23.8%	4.6%	2.1%	.4%	.0%	18.2%
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
	Percent HAL	13.3%	25.1%	24.9%	13.1%	10.7%	6.5%	.8%	.6%	15.2%

E. CRA DATA

Additional data tables related to Community Reinvestment Act (CRA) data are presented in this section.

Table 1.E.1
Small Business Loans Originated: \$100,000 or Less by Tract MFI
 1. Northeast Ohio Region
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	3,309	5,548	27,004	20,562	610	57,033
2001	4,032	6,610	30,451	21,853	788	63,734
2002	4,268	7,623	36,880	26,107	836	75,714
2003	4,373	9,993	36,668	28,048	350	79,432
2004	4,157	9,345	37,209	27,765	321	78,797
2005	3,920	9,454	39,685	30,327	251	83,637
2006	5,252	12,483	52,296	45,096	467	115,594
2007	5,531	13,373	57,267	49,930	406	126,507
2008	4,145	9,913	42,575	38,315	315	95,263
2009	1,796	4,195	17,867	17,266	150	41,274
2010	1,663	3,891	16,390	15,564	146	37,654
2011	2,110	4,715	20,713	19,111	209	46,858
Total	44,556	97,143	415,005	339,944	4,849	901,497
Loan Amount (\$1,000s)						
2000	47,440	76,748	356,482	268,550	10,114	759,334
2001	51,201	75,857	368,026	269,683	10,228	774,995
2002	52,362	84,215	406,810	309,106	13,522	866,015
2003	48,615	105,286	383,395	299,534	5,062	841,892
2004	46,215	101,799	383,708	309,080	4,392	845,194
2005	50,744	107,935	448,882	361,518	4,551	973,630
2006	51,710	128,037	536,980	469,862	4,909	1,191,498
2007	58,646	143,320	573,429	529,580	4,416	1,309,391
2008	44,106	101,121	417,692	405,060	4,378	972,357
2009	24,723	59,593	223,961	210,443	2,598	521,318
2010	25,856	63,587	241,907	224,608	2,913	558,871
2011	35,556	76,044	310,754	286,522	3,377	712,253
Total	537,174	1,123,542	4,652,026	3,943,546	70,460	10,326,748

Table 1.E.2
Small Business Loans Originated: \$100,001 to \$250,000 by Tract MFI
 1. Northeast Ohio Region
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	210	265	1,106	926	39	2,546
2001	222	323	1,479	1,170	57	3,251
2002	235	358	1,477	1,275	77	3,422
2003	195	420	1,281	1,086	25	3,007
2004	224	422	1,363	1,073	25	3,107
2005	216	394	1,244	1,025	15	2,894
2006	189	383	1,260	1,011	17	2,860
2007	177	336	1,094	948	11	2,566
2008	137	253	869	790	13	2,062
2009	94	233	678	626	13	1,644
2010	133	292	955	871	16	2,267
2011	154	286	1,008	917	14	2,379
Total	2,186	3,965	13,814	11,718	322	32,005
Loan Amount (\$1,000s)						
2000	36,051	45,508	191,306	163,049	7,254	443,168
2001	38,752	56,928	259,978	208,527	10,747	574,932
2002	42,616	64,010	261,164	222,103	14,919	604,812
2003	34,267	74,170	223,375	194,831	4,396	531,039
2004	39,875	76,724	243,227	190,360	4,699	554,885
2005	39,488	70,909	223,495	182,579	2,644	519,115
2006	34,140	69,560	222,122	181,205	3,115	510,142
2007	32,047	59,719	192,768	168,188	2,014	454,736
2008	25,030	44,651	151,694	140,368	2,396	364,139
2009	17,072	41,604	118,798	109,329	2,493	289,296
2010	25,117	53,517	169,889	154,858	2,612	405,993
2011	28,933	51,331	177,856	162,665	2,402	423,187
Total	393,388	708,631	2,435,672	2,078,062	59,691	5,675,444

Table 1.E.3
Small Business Loans Originated: More than \$250,000 by Tract MFI
 1. Northeast Ohio Region
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	166	176	1,022	886	61	2,311
2001	220	263	1,301	1,131	60	2,975
2002	270	305	1,537	1,388	84	3,584
2003	178	411	1,409	1,180	29	3,207
2004	221	445	1,451	1,252	38	3,407
2005	248	392	1,311	1,199	26	3,176
2006	217	383	1,229	1,140	24	2,993
2007	159	360	1,092	1,043	13	2,667
2008	149	309	814	927	16	2,215
2009	125	264	795	776	12	1,972
2010	213	386	1,104	1,045	23	2,771
2011	169	364	1,060	987	19	2,599
Total	2,335	4,058	14,125	12,954	405	33,877
Loan Amount (\$1,000s)						
2000	87,600	84,681	524,605	448,421	31,722	1,177,029
2001	114,040	138,621	676,184	591,614	33,209	1,553,668
2002	142,835	164,608	816,158	734,192	46,998	1,904,791
2003	95,891	224,301	744,182	632,081	13,661	1,710,116
2004	113,280	245,183	775,341	676,960	20,656	1,831,420
2005	138,145	215,046	705,684	659,125	15,049	1,733,049
2006	116,369	214,586	665,067	626,805	14,692	1,637,519
2007	91,054	197,565	587,430	566,216	7,488	1,449,753
2008	80,668	168,126	433,690	513,867	9,194	1,205,545
2009	68,673	149,889	421,318	428,066	7,416	1,075,362
2010	120,011	219,105	605,880	569,958	12,348	1,527,302
2011	96,328	205,496	558,827	526,830	11,100	1,398,581
Total	1,264,894	2,227,207	7,514,366	6,974,135	223,533	18,204,135

Table 1.E.4
Small Business Loans to Businesses with Gross Annual Revenues of Less Than
\$1 Million by Tract MFI
 1. Northeast Ohio Region
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	1,216	2,339	11,274	8,355	233	23,417
2001	1,660	2,749	13,494	9,962	382	28,247
2002	1,168	2,062	10,145	8,167	301	21,843
2003	1,316	3,087	12,334	9,599	88	26,424
2004	1,283	2,968	12,372	9,594	89	26,306
2005	1,640	4,105	18,169	14,041	82	38,037
2006	1,709	4,422	20,464	16,165	104	42,864
2007	1,873	4,783	21,701	17,429	90	45,876
2008	1,160	2,940	13,677	11,047	61	28,885
2009	549	1,430	6,530	5,764	28	14,301
2010	559	1,496	6,268	5,359	33	13,715
2011	883	2,082	9,614	8,656	64	21,299
Total	15,016	34,463	156,042	124,138	1,555	331,214
Loan Amount (\$1,000s)						
2000	53,913	88,979	452,765	393,055	18,256	1,006,968
2001	63,448	98,936	546,094	505,464	15,795	1,229,737
2002	90,008	128,826	604,911	576,336	25,914	1,425,995
2003	56,466	137,895	541,738	460,134	6,487	1,202,720
2004	56,055	129,933	468,796	420,546	6,131	1,081,461
2005	63,770	128,531	512,253	456,861	3,631	1,165,046
2006	48,503	123,685	523,422	478,427	3,648	1,177,685
2007	48,721	112,395	479,078	436,742	2,962	1,079,898
2008	37,276	74,000	326,023	324,687	3,856	765,842
2009	20,067	54,195	209,593	216,075	761	500,691
2010	25,144	73,633	266,213	263,751	3,206	631,947
2011	34,978	71,192	307,287	283,618	2,000	699,075
Total	598,349	1,222,200	5,238,173	4,815,696	92,647	11,967,065

F. COMPLAINT DATA

This section contains data regarding fair housing complaints, as provided by the U.S. Department of Housing and Urban Development (HUD), the Ohio Civil Rights Commission (OCRC), the Fair Housing Contact Service (FHCS), The Housing Resources and Advocacy Center, and the Fair Housing Resource Center (FHRC).

HUD COMPLAINTS

Table 1.F.1
Fair Housing Complaints by Basis
 1. Northeast Ohio Region
 2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color	3	4	3	6	16	10	2	1	2	47
Disability	106	105	141	77	120	87	120	90	56	902
Family Status	34	27	45	49	46	148	87	100	47	583
National Origin	6	10	12	11	39	21	31	6	7	143
Race	106	71	100	80	117	101	76	55	37	743
Religion	4	10	5	3	15	2	5	3	5	52
Sex	17	22	34	22	24	38	38	15	18	228
Total Bases	276	249	340	248	377	407	359	270	172	2,698
Total Complaints	252	225	281	205	288	347	309	248	142	2,297

Table 1.F.2
Fair Housing Complaints by Issue
 1. Northeast Ohio Region
 2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Discrimination in terms, conditions or privileges relating to rental	51	60	73	40	55	73	94	43	16	505
Discriminatory refusal to rent	60	56	51	59	51	38	47	21	26	409
Failure to make reasonable accommodation	49	40	56	31	32	38	68	51	26	391
Discriminatory terms, conditions, privileges, or services and facilities	23	28	39	33	54	37	45	50	45	354
Discriminatory advertisement - rental	3	2	7	1	19	111	17	54	29	243
Discriminatory advertising, statements, and notices	10	7	8	11	32	23	57	35	15	198
Discriminatory acts under Section 818 (coercion, etc.)	14	23	23	14	5	17	26	20	15	157
Discriminatory refusal to rent and negotiate for rental	19	16	15	16	12	20	28	6	6	138
Other discriminatory acts	24	15	15	8	18	4	10	8	9	111
Otherwise deny or make housing available	4	1	2	3	1	6	12	17	11	57
Discrimination in services and facilities relating to rental	4	2	7	8	6	6	7	7	3	50
Non-compliance with design and construction requirements (handicap)	4	2	18	3	4	3	1	4	9	48
False denial or representation of availability - rental	4	2	6	2	10	11	3	2	1	41
Discriminatory refusal to negotiate for rental	3		6	4	4	8	9	4		38
Discriminatory financing (includes real estate transactions)	4		7	6	6	1	1	2	1	28
Discrimination in making of loans	7	2		3	2	1	5	2		22
Using ordinances to discriminate in zoning and land use	1	1	1		15	2	1	1		22
Discriminatory refusal to sell	1	3	3	3	1	1	4	1	4	21
Discrimination in terms, conditions, privileges relating to sale	4	2	3		4	1	3	1	3	21
Failure to provide accessible and usable public and common user areas	3	1	13	1				3		21
Failure to permit reasonable modification	3	3	3	1	3		1	3	3	20
Discrimination in the terms or conditions for making loans	3		2	1		2	5	4	1	18
False denial or representation of availability	1		2		5	1	1		1	11
Steering	1		1	2	1	2	3			10
Failure to provide an accessible route into and thru the covered unit	1	1	5	2				1		10
Discriminatory refusal to sell and negotiate for sale	2	1	3			2	1			9
Failure to provide an accessible building entrance	1	2	4				1			8
Discriminatory advertising - sale	2				2	2				6
Refusing to provide insurance	3			2	1					6
Restriction of choices relative to a rental	2		1			3				6
Redlining - insurance	1				3					4
Failure to provide usable doors	2		1						1	4
Discriminatory refusal to negotiate for sale					1	2				3
Discrimination in the selling of residential real property					2		1			3
Discrimination in the appraising of residential real property				1		2				3
Discrimination in terms and conditions of membership	2	1								3
Discrimination in services and facilities relating to sale	1					1	1			3
Refusing to provide municipal services or property				1		1		1		3
False denial or representation of availability - sale							1		1	2
Discrimination in the brokering of residential real property		1		1						2
Discriminatory brokerage service					1		1			2
Redlining - mortgage			2							2
Adverse action against an employee						2				2
Failure to provide usable kitchens and bathrooms	1	1								2
Blockbusting - rental						1				1
Redlining	1									1
Restriction of choices relative to a sale	1									1
Use of discriminatory indicators	1									1
Total Issues	321	273	377	257	350	422	454	341	226	3,021
Total Complaints	252	225	281	205	288	347	309	248	142	2,297

Table 1.F.3
Fair Housing Complaints by Closure Status
 1. Northeast Ohio Region
 2004–2012 HUD Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Administrative Closure	26	28	28	30	42	59	40	24	7	284
Cause (FHAP)	30	21	40	22	44	104	70	62	6	399
Charged (HUD)					1	4				5
Conciliated / Settled	98	91	118	67	89	92	123	65	29	772
DOJ Closure	1				7					8
No Cause	97	85	95	86	105	87	72	62	1	690
Open						1	4	35	99	139
Total Complaints	252	225	281	205	288	347	309	248	142	2,297

HUD Complaints Found With Cause

Table 1.F.4
Fair Housing Complaints Found With Cause by Basis
 1. Northeast Ohio Region
 2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color	1	1	1	4		2	1			10
Disability	62	65	92	45	71	47	87	43	10	522
Family Status	24	16	28	29	33	108	65	67	20	390
National Origin	3	2	8	2	16	13	12	5		61
Race	44	27	37	20	36	41	29	12	5	251
Religion	1	1	1		3	1	1	2		10
Sex	9	8	11	6	4	22	22	6	3	91
Total Bases	144	120	178	106	163	234	217	135	38	1,335
Total Complaints	129	112	158	89	141	200	193	127	35	1,184

Table 1.F.5
Fair Housing Complaints Found With Cause by Issue
 1. Northeast Ohio Region
 2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Failure to make reasonable accommodation	32	28	37	21	24	26	52	29	6	255
Discrimination in terms, conditions or privileges relating to rental	22	23	30	15	26	32	58	20	4	230
Discriminatory refusal to rent	35	29	24	25	29	26	32	14	6	220
Discriminatory advertisement - rental	2	1	5	1	15	81	14	35	14	168
Discriminatory terms, conditions, privileges, or services and facilities	7	13	21	12	23	18	20	19	7	140
Discriminatory advertising, statements, and notices	6	5	4	9	23	19	41	24	4	135
Discriminatory refusal to rent and negotiate for rental	12	6	7	9	8	13	24	2		81
Discriminatory acts under Section 818 (coercion, etc.)	6	7	12	4	4	7	9	8	1	58
Other discriminatory acts	12	7	6	3	4	2	3	3	3	43
Non-compliance with design and construction requirements (handicap)	4	2	13	3	4		1	1	1	29
Discrimination in services and facilities relating to rental	1		6	4	2	5	6	3	1	28
False denial or representation of availability - rental	3	2	4	2	4	8	3	1		27
Otherwise deny or make housing available	2	1	1	2		3	5	7	1	22
Discriminatory refusal to negotiate for rental	2		3	3	2	6	4	1		21
Failure to provide accessible and usable public and common user areas	2	1	11	1						15
Failure to permit reasonable modification	3	3	3	1	1			2		13
Discrimination in making of loans	2	1		2	1		3			9
Using ordinances to discriminate in zoning and land use	1		1		7					9
Failure to provide an accessible route into and thru the covered unit	1	1	5	2						9
False denial or representation of availability	1		2		4	1				8
Failure to provide an accessible building entrance	1	2	4							7
Discriminatory refusal to sell		1	1	1			1	1	1	6
Discrimination in the terms or conditions for making loans	1			1		1	2	1		6
Steering	1			2		1	2			6
Discriminatory refusal to sell and negotiate for sale	1	1	2			1				5
Discriminatory financing (includes real estate transactions)	2		1			1		1		5
Restriction of choices relative to a rental	1		1			3				5
Discrimination in terms, conditions, privileges relating to sale	1		1				1		1	4
Discriminatory advertising - sale	1				1	1				3
Discrimination in services and facilities relating to sale	1						1			2
Refusing to provide insurance	1				1					2
Adverse action against an employee						2				2
Failure to provide usable doors	1		1							2
Failure to provide usable kitchens and bathrooms	1	1								2
Blockbusting - rental						1				1
Discrimination in the appraising of residential real property						1				1
Discriminatory brokerage service							1			1
Discrimination in terms and conditions of membership		1								1
Total Issues	169	136	206	123	183	259	283	172	50	1,581
Total Complaints	129	112	158	89	141	200	193	127	35	1,184

OHIO CIVIL RIGHTS COMMISSION COMPLAINTS

Table 1.F.6
Fair Housing Complaints by Basis
 1. Northeast Ohio Region
 2004–2012 OCRC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Age	1		1							2
Ancestry				1			1			2
Color	10	11	14	4	10	12	10	11	4	86
Disability	114	99	191	93	93	78	105	85	14	872
Family Status	31	17	34	48	51	41	53	45	12	332
Gender	23	24	54	30	28	29	36	23	11	258
National Origin	7	11	9	11	34	11	20	7	2	112
Race	102	89	104	88	84	63	63	64	19	715
Religion	6	7	6	9	5	1	5	5		44
Retaliation	24	46	45	34	31	24	23	76	10	313
Other	4	1	4	5	1	1		1	1	18
Total Bases	322	305	462	323	355	281	316	317	73	2,754
Total Complaints	261	235	348	233	251	213	254	245	49	2,089

Table 1.F.7
Fair Housing Complaints by Issue
 1. Northeast Ohio Region
 2004–2012 OCRC Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Advertising	14	2	5	2	4	12	21	26	9	95
Constructive Discharge			1							1
Demotion						1				1
Discharge				3						3
Exclusion	32	51	8	24	58	20	15			208
Harassment	26	28	24	20	22	22	15	11	4	172
Intimidation	13	13	30	13	23	12	15	17	9	145
Maternity				1						1
Other	121	90	104	67	68	60	90	89	21	710
Reasonable Accommodation	39	30	96	25	32	18	57	37	8	342
Recall			1							1
Sexual Harassment	8	6	9	6	6	4	3	1	3	46
Terms and Conditions	76	91	164	120	114	103	105	114	14	901
Testing				1						1
Total Issues	329	311	442	282	327	252	321	295	68	2,627
Total Complaints	261	235	348	233	251	213	254	245	49	2,089

Table 1.F.8
Fair Housing Complaints by Closure Status
 1. Northeast Ohio Region
 2004–2012 OCRC Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Administrative Closure	10	3	3	7	8	19	15	17	4	86
CP Failed to Cooperate	4	4	10	22	3	12	16	10	2	83
CP Refused Full Relief			32							32
CP Withdrawal – No Benefit	27	23	15	12	21	8	27	12	5	150
Failure to Locate Charging Party	1		2		2					5
Hearings Discrimination Finding			1							1
Inquiry Closed		1								1
No Cause Finding Issued	100	98	113	108	100	66	61	71	4	721
No Jurisdiction	1	4	7	2	3	5	5	5	6	38
Open Charge Closed By Legal Activity		5	9		1	5				20
Settlement With Benefits	50	37	87	38	54	63	75	49	16	469
Successful Conciliation	6	5	17	12	19	11	18	5		93
Withdrawal With Benefits	56	55	52	32	40	24	37	76	12	384
Missing	6									6
Total Complaints	261	235	348	233	251	213	254	245	49	2,089

FAIR HOUSING CONTACT SERVICE COMPLAINTS

Table 1.F.9
Fair Housing Complaints by Basis
 1. Northeast Ohio Region
 2004–2012 FHCS Data

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

Table 1.F.10
Fair Housing Complaints by Closure Status
 1. Northeast Ohio Region
 2004–2012 FHCS Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Closed			74	51	54	62	15	23	4	283
Dismissed			6	1	3	2	1	1		14
Elected not to pursue						12	12	6	14	44
Independently resolved						26	16	20	6	68
Inquiry			52	33	81	3	1	3	20	193
Lack of jurisdiction					18				1	19
No contact							46	50	10	106
No probable cause			24	24	17	12	8	9	1	95
Pending			16	19	2	1	1	4	10	53
Probable cause			8	4		7	22	22	1	64
Reasonable accommodation granted				1			5	8	8	22
Reasonable modification granted							1	3	2	6
Referred for other assistance							9	3	9	21
Settled			36	6	8	23	26	19	11	129
Settled through OCRC					10	1			1	12
Withdrawal of Charge					7			4	3	14
Missing	72	21		3	1					97
Total Complaints	72	21	216	142	201	149	163	175	101	1,240

FAIR HOUSING RESOURCE CENTER COMPLAINTS

Table 1.F.11
Fair Housing Complaints by Basis
 1. Northeast Ohio 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
Family Status	5	12	5	3	2	2		2	2	33
National Origin	4		4					1		9
Race	16	6	7	2	4	3	6	6	2	52
Sex	2		3			1				6
Other	3	4	11	19	11	6	11	15	13	93
Total Bases	74	46	54	37	23	28	44	37	33	376
Total Complaints	74	46	54	37	23	28	43	33	32	370

Table 1.F.12
Fair Housing Complaints by Issue Type
 1. Northeast Ohio 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
Sales		1								1
Advertising			2	7	2	1	1		1	14
Total	74	46	54	37	23	28	43	33	32	370

Table 1.F.13
Fair Housing Complaints by Closure Status
 1. Northeast Ohio Region
 2004– 2012 FHRC Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Investigated and referred to HUD/OCRC	2	1			1	2	1			7
Investigated and settled		1								1
Settled through counseling	65	40	46	34	21	22	35	28	26	317
Complaint filed in federal court								1		690
Reasonable Accommodation Granted	6	4	3	3		4	7	4	6	37
Referred to OCRC	1		5		1					7
Total	74	46	54	37	23	28	43	33	32	370

THE HOUSING RESOURCE AND ADVOCACY CENTER

Table 1.F.14
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
Total Bases	6	13	36	44	53	56	120	87	152	567
Total Complaints	6	13	24	40	48	50	105	78	98	462

Table 1.F.15
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
Total	6	13	24	40	48	50	105	78	98	462
Total Complaints	6	13	24	40	48	50	105	78	98	462

Table 1.F.16
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
Total	7	21	30	48	59	48	97	82	118	510
Total Complaints	6	13	24	40	48	50	105	78	98	462

G. FAIR HOUSING SURVEY FOR HOUSING STAKEHOLDERS DATA

This section presents public involvement data gathered through the 2012–2013 Fair Housing Survey for Housing Stakeholders.

As discussed in volumes **I** and **II**, the NEOSCC elected to utilize an online survey instrument as a means to encourage public input in the Regional AI process. The 2012–2013 Fair Housing Survey for Housing Stakeholders targeted individuals involved in the housing arena, although anyone could complete the survey. This sample selection method is known as a judgmental sample rather than a statistical sample. The primary purpose was to measure stakeholder knowledge and understanding of fair housing law, existing issues, and affirmatively further fair housing. An initial contact list was assembled by the NEOSCC and recipients were asked to forward the survey to members of their communities and organizations. However, some of the subareas of the Region did not respond to the survey.

In addition, some respondents did not answer all the questions or and did not answer the opinion-based questions from which analysis about impediments to fair housing choice can be drawn. Table 1.G.1 presents the number of responses as well as the number of

incomplete surveys from each of the geographic areas identified in this volume. As shown, thorough analyses cannot be drawn from the survey for all geographic areas; thus, the impediments identified for nearly all areas are based on the region-wide responses, when locally specific issues cannot be shown.

Table 1.G.1
Fair Housing Survey – Complete and Missing
 Northeast Ohio Region
 2012–2013 Fair Housing Survey for Housing Stakeholders Data

Area	Total	Missing Answer	Percent Missing
1. NOACA Region	81	23	28.4%
2. NEFCO Region	48	12	25.0%
3. Eastgate Region	54	13	24.1%
4. Akron Housing Market Area	38	9	23.7%
5. Ashtabula Housing Market Area	7	1	14.3%
6. Canton-Massillon Housing Market Area	7	2	28.6%
7. Cleveland Housing Market Area	81	23	28.4%
8. Wooster Housing Market Area	3	1	33.3%
9. Youngstown-Warren Housing Market Area	47	12	25.5%
10. Ashtabula County	7	1	14.3%
11. Cuyahoga County	50	16	32.0%
12. City of Cleveland	36	11	30.6%
13. City of Lakewood	5	2	40.0%
14. Remainder of Cuyahoga County	9	3	33.3%
15. Geauga County	4	2	50.0%
16. Lake County	18	2	11.1%
17. City of Mentor	7	1	14.3%
18. Remainder of Lake County	11	1	9.1%
19. Lorain County	3	0	0.0%
20. City of Lorain	2	0	0.0%
21. Remainder of Lorain County	1	0	0.0%
22. Mahoning County	22	5	22.7%
23. City of Youngstown	20	5	25.0%
24. Remainder of Mahoning County	2	0	0.0%
25. Medina County	6	3	50.0%
26. Portage County	12	2	16.7%
27. City of Kent	9	2	22.2%
28. Remainder of Portage County	3	0	0.0%
29. Stark County	7	2	28.6%
30. City of Alliance	1	1	100.0%
31. City of Canton	6	1	16.7%
32. Remainder of Stark County	0	0	0.0%
33. Summit County	26	7	26.9%
34. City of Akron	23	7	30.4%
35. City of Barberton	1	0	0.0%
36. Remainder of Summit County	2	0	0.0%
37. Trumbull County	25	7	28.0%
38. City of Warren	24	7	29.2%
39. Remainder of Trumbull County	1	0	0.0%
40. Wayne County	3	1	33.3%
Northeast Ohio Region	183	48	26.2%

Table 1.G.2**Primary Role of Respondent**

1. Northeast Ohio 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
Total	183

FEDERAL, STATE, AND LOCAL LAWS**Table 1.G.3****Familiarity with Fair Housing Laws**

1. Northeast Ohio Region
2012–2013 Fair Housing Survey
for Housing Stakeholders Data

Familiarity	Total
Not Familiar	13
Somewhat Familiar	53
Very Familiar	67
Missing	50
Total	183

Table 1.G.4**Perceptions About Fair Housing Laws**

1. Northeast Ohio 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 think fair housing laws are adequately enforced?	93	27	8	55	183

Table 1.G.5**Fair Housing Activities**

1. Northeast Ohio Region
2012–2013 Fair Housing Survey for Housing Stakeholders Data

2012 - 2016 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

Table 1.G.6**Protected Classes**

1. Northeast Ohio 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
Total	433

Table 1.G.7**Fair Housing Violation Referrals**

1. Northeast Ohio 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	14
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
Total	153

LOCAL FAIR HOUSING

Table 1.G.8

Local Fair Housing

1. Northeast Ohio 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

FAIR HOUSING IN THE PRIVATE SECTOR

Table 1.G.9

Barriers to Fair Housing in the Private Sector

1. Northeast Ohio Region

2012–2013 Fair Housing Survey for Housing Stakeholders Data

Question	Yes	No	Don't Know	Missing	Total
Are you aware of any questionable practices or barriers to fair housing choice in:					
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

FAIR HOUSING IN THE PUBLIC SECTOR

Table 1.G.10

Barriers to Fair Housing in the Public Sector

1. Northeast Ohio Region

2012–2013 Fair Housing Survey for Housing Stakeholders Data

Question	Yes	No	Don't Know	Missing	Total
Are you aware of any questionable practices or barriers to fair housing choice in:					
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

NARRATIVE COMMENTS

Federal, State, and Local Laws

Table 1.G.11
How did you become aware of fair housing laws?

1. Northeast Ohio Region
2013 Fair Housing Survey Data

Comments:
<p>15 years of Community Development and working with Federal CDBG, HOME and other funds 25 years in HUD rental programs 25 years of working in the non-profit field of affordable housing As a landlord and community development professional As a landlord, I must know "the rules". Attended Fair Housing Commission meetings while working for a different county. Attending meetings with Fair Housing staff. Training from Portage County Regional Planning Attending workshops Because of my professional work experience in areas of community development and public housing. Been doing this for over 30 years dealing with HUD and ODOD, now ODSA Been involved with low income housing for 15 years, training in various settings Being educated as a fair housing board member By living in communities that stressed pro-integration policies. Conferences, Meetings, Studying them...etc... education Education experience From Vince Curry (FHAA) Akron, Ohio about 12 years ago. gdgdg Generally through my work. I am a civil rights attorney specializing in housing law. I am a housing advocate and present trainings on Fair Housing. I am a Real Estate broker I am an approved Continuing Education provider and Instructor for the Division of Real Estate and regularly teach Fair Housing to real estate licensees. I am an attorney on the housing team. I am part of the Trumbull Housing Collaborative and I am a homeless outreach worker I am responsible for administering the CDBG/housing programs and ensuring compliance with all applicable regulations, including fair housing requirements. I am the Fair Housing Coordinator for the County I became familiar with fair housing laws in connection with the housing programs our PHA administers. I did some property management (landlord) - almost all laws are heavily biased toward the tenant. If tenants know the laws, they can game the system and easily get 2 to 3 months free rent before they are thrown out by the sheriff and the owner not only loses rent but also damages to the property and legal fees. So called "fair" housing doesn't seem to address this side of the equation. I have taken trainings and read in this area. I have worked in the Fair Housing non-profit field since 2000. I have worked with the Fair Housing Board and Community Legal Aid with regard to housing issues. I hold a real estate license in Ohio and it is a requirement of licensing. I worked on the update to the County of Summit Analysis of Impediments to Fair Housing Choice In order to acquire a real estate license we must take fair housing at both the state and local level as part of our real estate law course, and then re-take it every three years in order to maintain our license In the past I was a landlord; also, I have been asked by a number of international students to intervene in tenant/landlord disputes. Internet HUD NFCC It be the job for which I do. Ongoing education Our agency participates on the local Housing Collaborative. personal experiences Property Management Training Read information supplied by local housing authority. Real estate agent/Broker for the last 30 years Real Estate Association real estate classes, trainings, etc.. Real Estate Investors Assoc education Real estate law Real estate license and continuing education classes. realtors must always go to classes Reasonable Accommodation/Fair Housing and 504 Compliance Office for AMHA Research and seminars.</p>

Retired city planner in Warren.

The Akron Area Board of REALTORS sponsors civil rights continuing education classes which are required of real estate licensees every three years. As an organization we're also dedicated to promoting fair housing and equal housing and coordinate activities and educational programs promoting these values.

The Housing Authority must be very cognizant of the fair housing laws as an owner and manager of various types of housing programs.

The housing authority works closely with it's local fair housing agency to serve tenants in common

The PHA does periodic trainings for staff, and I also regularly attend housing conferences and workshops.

through job training

through my employment situation

Through my work and multiple trainings on the topic.

Through participating on various community related development efforts that dealt with housing regulations.

Through real estate

Through trade associations such as HBA and Realtors

Through trainings for Housing Counselors under HUD.

Throughout my career as a Real Estate Agent the education and updates keep us aware of fair housing laws.

Training sessions and workshops are attended by staff. We review HUD notifications.

Training through the City of Lakewood

Trainings and review of regulations

Was a Realtor for over 15 years

We're a fair housing agency.

When I read of government (local, county, state, federal) being able to tell the owner who they could rent or sell to.

With events at association on Fair Housing

Work on a housing services board.

Worked as a CSR for Banks- Loan officer and now in the City Fair Housing Board

Working closely and sharing contracts with The Housing Research and Advocacy Center

Working with city government

Table 1.G.12
How should fair housing laws be changed?

1. Northeast Ohio Region
 2013 Fair Housing Survey Data

Comments:
<p>According to the U.S. Constitution, every citizen is protected in the buying or leasing of housing. No laws are needed. Follow the U.S. Constitution.</p> <p>Add ban the box...Discrimination based on Felony/arrest records.</p> <p>Additional protected classes</p> <p>Additional protected classes, particularly Sexual Orientation should be added</p> <p>All People with Children don't need to be in ashelter for no longer than 2 days because this is to tramatic for all involved be it a fire abuse etc.. Too many empty homes that need to be occupied and adaquately repaired.First time done job that last a lifetime no work done shabby to get more money in the near futrue. On going program to assist elderly in any repairs of older sturtured property.</p> <p>As stated above, the laws are extremely biased toward the drags on society. The laws should be changed so that delinquent people face the choice of paying (what they already promised to pay) their rent or moving out within days not months. This would cause these people to get more responsible and serious about their lives and be a better impact on our society (and economy). The ways the laws are now, it only encourages irresponsibility.</p> <p>criminal background checks, all offenses should not bar you from living in decent housing, landlords should be responsible to affordable and decent housing,</p> <p>Expand protected classes in our community</p> <p>Fair housing laws need to be more inclusive off vulnerable populations not just based on ethnicity and disability. seniors, renters, low income, populations, and students should all be protected classes in my opinion.</p> <p>Familial status because sometimes a landlord should have the option to rent certain units to certain size families.</p> <p>Federal and/or Ohio Law should include sexual orientation.</p> <p>get rid of it. involves government at the expense of liberty. tort law has existed for centuries as remediation.</p> <p>Have inspectors to go and find out if the laws are being upheld. The Urban League has done it in the past.</p> <p>I should be able to rent my property to anyone i want to. It is my property and I want someone that will take care of it.</p> <p>I think source of income and sexual orientation should be federally protected classes.</p> <p>Include sexual orientation/identity</p> <p>More funding needs to be provided for investigation & enforcement of the current laws.</p> <p>Need to include sexual orientation Those reentrying Income</p> <p>Property owner should have the final say in who he does or does not rent to. Most property owners are only concerned about the color "green" and getting paid on regular basis. Laws force landlords to take renters who may not qualify financially.</p> <p>Property owners should be able to rent to anyone they wish.....and NOT to anyone they do not wish, without threat by the government. It's a constitutional concept called PRIVATE PROPERTY RIGHTS.</p> <p>Sexual Orientation should be added.</p> <p>should add sexual preference or identiy</p> <p>They should be strengthened and the penalties made heavier, especially for municipalities and counties that receive federal funds.</p> <p>They should be strengthened for enforcement purposes and to include additional protected classes.</p> <p>Think laws should be upadated to reflex issues and concern revelant to a changing conditions.</p> <p>To afford greater protection to wider groups and harsher penalties for violators.</p> <p>to included formerly incarcerated persons as a portected class</p>

Local Fair Housing

Table 1.G.13

Are there any specific geographic areas that have fair housing problems?

1. Northeast Ohio Region
2013 Fair Housing Survey Data

Comments:
<p>All areas in the County have Fair Housing issues. Personally seen them in Cleveland, North Olmsted, Lakewood, Westlake, Rocky River, Olmsted Falls, South Euclid, Cleveland Hts., Solon, Mayfield Hts., Strongsville, Middleburg Hts., Shaker Hts, Cuyahga Hts. (race, national origin, religion, family status, disability)</p> <p>All geographic areas. Housing discrimination occurs everywhere.</p> <p>Complaints cluster in higher density areas but nothing that would seem out of the norm in number of complaints in any one area</p> <p>Few people of color located anywhere in the county except for Painesville.</p> <p>In Alliance I have known of issues.</p> <p>Little Italy, various other enclaves in the city, specifically ethnic ones</p> <p>north side</p> <p>Race discrimination is still a problem in suburban areas. Discrimination against persons with disabilities is still rampant.</p> <p>Suburbs have limited development through restrictive zoning</p> <p>Summer wind development. And barnstone development.</p> <p>The City of Mentor defers all of their CDBG funds to Western Reserve Community Development. The net effect is the restriction of providing basic Life Safety funds to repair Mentor Seniors and Disabled homes.</p> <p>The third ward. The rich class has very few medium housing rentals if any at all.</p> <p>The urban centers of Youngstown and Warren have too few safe and affordable housing options.</p> <p>There is a perception of Fair housing issues in key growth areas of our city.</p> <p>These areas include the SE sides of town and parts of the NE and NW</p> <p>yes, limits need to be placed on rental units. they are priced at above 45% of the average household income.</p>

Table 1.G.14

Are there any specific groups in that face housing discrimination?

1. Northeast Ohio Region
2013 Fair Housing Survey Data

Comments:
<p>African Americans, Hispanics would seem to be most impacted</p> <p>All members of protected classes and individuals who have been incarcerated, pay their rent with sources of income other than employment, among others.</p> <p>All of the protected classes.</p> <p>disabled</p> <p>Disabled</p> <p>Elderly/disabled; families with children in need of rentals.</p> <p>Formerly incarcerated persons often face discrimination when attempting secure housing</p> <p>Homeless and very low income trying to get in subsidized housing. It takes 6 to 8 weeks to pass screening by then I lost touch with those waiting for housing. Entire process is too long, yet there are a plenty of empty units at the high rise in warren sitting empty.</p> <p>Individuals with mental illness and those who have a criminal background</p> <p>low income, convicted felons, other than registered sex offenders</p> <p>Mental illness</p> <p>mentally ill</p> <p>Minorities and women with children</p> <p>Muslims/Arabs, Latinos (all), African Americans, families with children, people with disabilities</p> <p>Not so much discrimination as the ability to afford to live in the community. Affordable housing option are limited.</p> <p>Or, perhaps criminals.</p> <p>Persons with disabilities</p> <p>Possibly-Those with felony records</p> <p>Race, color, disability, familial status especially. People refusing to rent or grant accommodations.</p> <p>Racial and ethnic minorities</p> <p>Racial and ethnic minorities.</p> <p>Racial minorities in particular seem most prevalent</p> <p>racial minorities, low income households, special needs populations</p> <p>Senior citizens..... who rent from RDW (a rental landlord). They are being assessed more rent money if they try to have say 2 seniors who want to rent a 2 bedroom or loft apartment from this landlord, location in question is Boardman, in the Huntington Woods area apartments. This owner is forever ripping these people off with some nickel and dime charges for everything and anything he can come up with, monthly and yearly, on lease renewals you name it. This is not fair or right.</p> <p>The black and Indian community from my earlier examples.</p> <p>The elderly and disabled.</p> <p>The southeast side of Canton is very segregated and reserved for mainly low-income individuals. Historically in Canton, this is where the African-American community has been displaced and forced to be there.</p> <p>They are disparate impact issues. Housing not in neighborhoods, but rather across from industrial site.</p> <p>unemployed out of work - no rentals or not enough</p>

Table 1.G.15
Please share any additional comments.

1. Northeast Ohio Region
 2013 Fair Housing Survey Data

Comments:
<p>All of the potential violations of the federal, state, and local fair housing laws occur in our area. Housing discrimination and segregated communities are a growing problem that effect not only where one lives but in many respects ones life chances through access to quality schools, transportation, employment, and a healthy environment. The health and sustainability of the community as a whole suffers without housing choice and integration. I would be happy to talk with you about any of these issues in more detail.</p> <p>Comment on English. Language barrier needs to be addressed during the permitting process. Either they know English or they hire a translator (at their expense, not the counties). If you pander to their specific language during the permitting - and then turn them over to contractors that only speak English - you are setting up an opportunity for failure for both parties. Resisting to assimilate to our common language will only serve to keep that person in a limited socioeconomic class which will not serve them or the community particularly well.</p> <p>Follow the U.S. Constitution</p> <p>given the fast number of persons returning to their community after a period of incarceration I would strongly advocate for making such persons a protected class to end housing discrimination against them.</p> <p>Howard Hanna real estate company agents that work in Canfield discriminate often.</p> <p>I encourage Fair Housing groups to continue to educate the community, advocate, and promote Fair Housing laws.</p> <p>It is an important issue.</p> <p>n/a</p> <p>see box 3 above.</p> <p>Several of the questions such as, "...Do you think fair housing laws serve a useful purpose" are not easily answered "yes" or "no", and "don't know" isn't of much use to you for the survey.</p> <p>The concept of "Fair Housing" sounds good but flies in the face of Liberty and Private Property rights that this nation was founded on. It has gone way too far.</p> <p>There needs to be more effort assisting Condo homeowners in the resolution of their complaints against Condo associations.</p> <p>This survey is obviously heavily biased. Where are the questions regarding the multitude of problems that landlords continually face?? If this survey even attempted to be even handed it might have been useful in seeing the real big picture of housing concerns - unfortunately this will end up being another biased paper and waste of tax payer money.</p>

Fair Housing in the Private Sector

Table 1.G.16

Are you aware of any questionable practices or barriers to fair housing choice in the rental housing market?

1. Northeast Ohio Region
2013 Fair Housing Survey Data

Comments:
<p>A person with an Indian accent could not rent a place but when he called back and changed his voice he was offered to see the place.</p> <p>Canfield Ohio does not accept people of color</p> <p>color</p> <p>Difficulties faced by persons with disabilities</p> <p>Disability , accommodations</p> <p>Family status & marital status - refusing to rent to a single mom with children; other attempts to refuse to allow children.</p> <p>Have heard from various senior friends that they feel they are being charged more for rent so they won't choose to live in certain apartment communities, charging more if say two sisters decide to split the rent and live together to help keep their rental expense down.</p> <p>I am aware that these things happen, but only from reporting for the agency we contract with for Fair Housing services.</p> <p>I think it is arbitrary that rental properties under 3 units is exempt from Fair Housing practices</p> <p>Landlords have been known to discriminate against formerly homeless individuals</p> <p>Landlords who don't want black tenants. I work with HIV positive persons and know people who've been kicked out when the landlord found out.</p> <p>Landlords who don't want to rent to families with children and try to advertise "no children" which is illegal.</p> <p>Making reasonable accommodations; families with children; therapy animals. Many non-traditional landlords (people who couldn't sell their homes) do not understand Fair Housing.</p> <p>Obtaining affordable housing is a barrier to the poor and working poor.</p> <p>Ongoing turnover in managers and new rental creates a lack of knowledge resulting in poor decisions</p> <p>Persons with disabilities especially face discriminatory policies put in place by landlords and local governments. I am also aware of local landlords who prefer to deny applications from immigrants and persons on student or work visas.</p> <p>rather than answer each of these separately, let me simply state that I have a general sense that practices negatively impacting fair housing continue to be practiced, though less frequently, and less blatantly, than in the past. I believe the practices are now more likely to be informal.</p> <p>refusal to rent based on disability</p> <p>Refusal to rent to people who are affiliated with the local mental health agency (discrimination based on disability).</p> <p>Refusal to rent, differences in price/fees, denial of reasonable modifications & accommodations,</p> <p>Segregation resulting from housing discrimination against all protected classes Lack of accessible housing for people with disabilities Discrimination against families with children based on incorrect occupancy We would be happy to discuss these issues in more detail.</p> <p>Some barriers include racial make up of different communities within the immediate vicinity of Canton</p> <p>Specific neighborhoods - less welcoming to minorities, like Little Italy...Gentrifying neighborhoods like Tremont with little affordable housing</p> <p>There are landlords who prefer not to rent to people with what they consider to be too many children. I have also heard of families who have trouble renting housing in certain areas because of reluctance to accept Housing Choice Vouchers. This can make it difficult for families to have adequate housing options.</p> <p>There are sexual orientation, religious, and ethnicity barriers.</p> <p>There are still people that discriminate on the basis of disability and race especially.</p> <p>There is a lack of availability of affordable housing in areas of opportunity.</p> <p>Though cases I have seen come through our office.</p> <p>Unknown.</p> <p>We've referred callers to Fair Housing Contact Services based on alleged discrimination for renters in the area of ADA compliance and familial status.</p> <p>When employed we referred to the proper organizations and if they were politically connected we would be directed NOT to do it..</p> <p>Zoning requirements for minimum square footage conflict with HUD requirements</p>

Table 1.G.17**Are you aware of any questionable practices or barriers to fair housing choice in the real estate industry?**

1. Northeast Ohio Region
2013 Fair Housing Survey Data

Comments:
<p>A coworker said she decided to change her name from an ethnic one to a more common one so she could go through the process of looking at and buying a home. Her decision was based on her experience of not getting calls back from people in the home buying process in the area in the past.</p> <p>Again race plays a part. I only "know" this anecdotally.</p> <p>All too common practice even today.</p> <p>I am aware that these things happen, but only from reporting for the agency we contract with for Fair Housing services.</p> <p>I know some minorities who do not feel welcomed to live in certain parts of the county.</p> <p>I know someone who sued their realtor because they were not being permitted to view all available housing within a community. The realtor was showing African American families homes in specific sections of the city.</p> <p>Mental disabilities were the basis of eviction of a Senior from her home.</p> <p>racial</p> <p>see above</p> <p>See above answer in block number 1.</p> <p>Steering Blockbusting Lack of knowledge about fair housing laws Lack of supervision and training of real estate agents by brokerage firms</p> <p>Steering, differences in level of service</p> <p>tend to be biased against Cleveland neighborhoods</p> <p>The amount of segregation must point to some racial steering.</p> <p>The industry is pretty well trained and the consequences for violation are well known.</p> <p>There are locations where the real estate agents actively work to maintain adult only communities as well as minimize the number of minority families living in the area.</p>

Table 1.G.18**Are you aware of any questionable practices or barriers to fair housing choice in the mortgage and home lending industry?**

1. Northeast Ohio Region
2013 Fair Housing Survey Data

Comments:
<p>A lot of the foreclosures on homes in the area were filed against minorities, many women who were victims of lending scams</p> <p>A neighbor of mine was turned down for a refinance mortgage when her lender refused to consider her disability income.</p> <p>Differences in level of service, rates, loan products, application requirements</p> <p>Disproportionate loan denials</p> <p>HUD regulation prohibit home improvement grants & loans to persons living in mobile homes in mobile home parks.</p> <p>I am aware that these things happen, but only from reporting for the agency we contract with for Fair Housing services.</p> <p>I personally have visited several banks and was basically turned away with before they even took my application. They gave me the "ive been doing this for years and you probably dont qualify"</p> <p>It is my belief that people of different races are treated substantially differently by the lending community. Minorities are denied access to credit or charged higher interest rates.</p> <p>Loan products that were developed such as the interest only product and the ARM loan product created a scenario that adversely impacted racial minorities more than other ethnic groups. These loan products were used more consistently in urban areas to finance homes and rental properties.</p> <p>More minorities are denied loans for mortgages.</p> <p>Mortgages are offered in only certin areas and Private mortgage insurance is disportionately apply to minoeities</p> <p>People of color are denied and receive high-cost loans more often.</p> <p>People of color have difficulty obtaining loans. Part of that is based on neighborhoods.</p> <p>Persons of color higher rates. I am a single woman with an 800 credit score currently refinancing and was given a quote of over 1% higher from the bank's mortgage dept than I'd been quoted by two different branch staff. When I pointed it out, suddenly that lower rate was in fact available.</p> <p>Probable to minorities or others with large families.</p> <p>Redlining Different terms and conditions Inaccessible information about lending practices</p> <p>see above story.</p> <p>Taking advantage of the elderly. This was before the Predatory Lending penalties were issued. Hopefully, it's better now. However, there are still greedy folks out there.</p> <p>Women and racial minorities have higher interest rate and are denied loan modifications at at higher rate than Whites.</p>

Table 1.G.19**Are you aware of any questionable practices or barriers to fair housing choice in the housing construction or accessible housing design fields?**1. Northeast Ohio Region
2013 Fair Housing Survey Data

Comments:
<p>Afordable housing not being built by developers all over the place, inaccessiblity Enforcement, Enforcement, Enforcement. Handicapped acessibilty is required by law. I understand a Canfield new housing development would not permit any section 8 in there (summer wind development). I understand they want no people of color Inaccessible housing Lack of knowledge or ignoring building code and fair housing law requirements Differences in treatment based on location/neighborhood of property. More Universal Design is needed. Recently, K&D got in a major suit over building inaccessible housing and bribing building officials Sometimes the building code doesn't work. Sometimes there are NIMBYS that have too much influence. stupid question - the federal government passed a law against that in the Reagan administration - the full employment act for attorneys. Try looking at the housing being built around the University of Akron for compliance with the building code. When buildings are accessible it is often side,hard to get to entrance.</p>

Table 1.G.20**Are you aware of any questionable practices or barriers to fair housing choice in the home insurance industry?**1. Northeast Ohio Region
2013 Fair Housing Survey Data

Comments:
<p>In the insurance industry many companies fail to ensure homes in communities with an older housing stock and they refuse in some respects to insure rental property due to age of the housing and the type of features that exist in the homes. Most of the homes in urbanized areas are occupied by minorities and renters which are protected classes. by virtue of looking at housing age and rental factors you are by default making it difficult to obtain or maintain insurance for certain groups. Even if the basis for insurance companies decision are not racially motivated. the factors in which insurance companies make decisions on who to ensure and at what rate will impact certain groups more than others. Insurance companies drop Seniors' homeowner's insurance policies prior to the completion of HUD assistance application & construction process. Limiting policies and coverages to racial minorities many of the families we work with have inadequate or no home owners insurance. We work exclusively with low income home owners. often difficult to get insurance coverage in low income areas Redlining Different terms and conditions Inaccessible information about practices Differences in treatment based on location/neighborhood of property. The refusal to insure homes near abandoned properties has a disparate impact on people of color.</p>

Table 1.G.21
Are you aware of any questionable practices or barriers to fair housing choice in the home appraisal industry?

1. Northeast Ohio Region
 2013 Fair Housing Survey Data

Comments:
<p>Appraisers often use language in describing neighborhoods and properties that violate Fair Housing requirements. Basing home values on the racial & ethnic composition of neighborhoods.</p> <p>But, I would assume there is.</p> <p>Have not seen anything as blatant as example cited above</p> <p>I think the appraisal industry is fully out of whack and contributing to the slow housing market. They have over-corrected and hampering sales and legitimate increase in values which hurts everyone</p> <p>In the past Black neighborhoods had houses appraised to high and now with the decline they have declined in value at a greater percentage than similar 'white' neighborhoods</p> <p>It seems that race is associated with lower neighborhood values. Perhaps, it is by coincidence that high crime rates are cited as factors creating lower values.</p> <p>its a known fact that lower income minority communities housing stock appraises lower than non-minority communities. The reason for this one can assume is not primarily condition of the housing stock. when racial composition changes in neighborhoods so does the housing values in those communities.</p> <p>many homes in minority areas were valued below there actual value</p> <p>Redlining Different terms and conditions Inaccessible information about practices Differences in treatment based on location/neighborhood of property.</p> <p>The changing real estate market has affected rental comparables and property values.</p>

Table 1.G.22
Are you aware of any questionable practices or barriers to fair housing choice in any other housing services?

1. Northeast Ohio Region
 2013 Fair Housing Survey Data

Comments:
<p>Crappy, unsafe, substandard rental units and rental houses for the poor.</p> <p>Differences in treatment of individuals and maintenance of property based on location/neighborhood of property.</p> <p>If the lenders don't want you to have a home they will tel you that the value does not meet the price.</p> <p>In Cleveland, a family member who is White has found it difficult to foreclosure prevention assistance. One person she talked to told her their service was only for Black people.</p> <p>In Ward 1 in Garfield minority interest seeking to purchase a home in the Garfield community are steered to the Ward 1 area of the City. Many of those minorities who desire to live in that community because of the school system end up in Ward 1 because that area of Garfield falls under the CMSD jurisdiction. By steering minorities to this area those families with school aged children don't get the benefit of going to Garfield schools, rather they must attend John Adams which is a CMSD institution.</p> <p>Lack or low and moderate rental units</p> <p>The City of Akron has reduced its housing inspection program which impacts the minority community the most.</p>

Fair Housing in the Public Sector

Table 1.G.23
Are you aware of any questionable practices or barriers to fair housing choice in land use policies?

1. Northeast Ohio Region
 2013 Fair Housing Survey Data

Comments:
<p>and why wouldn't a community choose to do that?</p> <p>big lot zoning, NIMBY concerning affordable housing</p> <p>Concentration of multi-family housing in segregated areas.</p> <p>For an example of concentrating housing for persons with disabilities in locations where they will be isolated, look at the development of the Madeline Terrace (name?) being undertaken by the Community Support Services. They will be creating an apartment complex where only people with disabilities will be allowed to live, concentrating them into an area where there are few available alternatives for shopping, recreation, etc. It is all being done to reduce the cost of providing services, rather than trying to integrate people with disabilities into the wider community. It will become a modern day 'ghetto'.</p> <p>It is more economic but large lot zoning excludes many from living here, although not specifically for Fair Housing</p> <p>It's known as 'zoning'. It is a practice that has been in existence for a long time. I only have problems with it when the zoning gets changed for crony capitalistic reasons, or when the government, through grants, intrudes on a community.</p> <p>Land use for multi-family units is limited to 3 major cities</p> <p>Localities have been increasing densities allowed in areas as sewers are extended.</p> <p>Low-income housing is concentrated in areas bordering industrial sites.</p> <p>more and more we are seeing the desire to create compact mixed use communities that offer convenience by promoting walkability and creates sustainable developments. However many of the developments that are created concentrate people of similar incomes and social status. We are moving toward a mixed income scenario with some developments however it is not as much as we need</p> <p>Policies that concentrate multi-family housing in limited areas</p> <p>SOME suburban communities limit densities making it next to impossible to build multi family units without getting a variance, which can be a very dicey procedure.</p> <p>There are townships that do not provide for multi-family housing at all.</p> <p>Violent NIMBYs have been the rule in the past and present. There have been marches currently in 2012 in Warren against elderly housing units.</p> <p>Youngstown is currently updating their zoning code but the current code limits these types of uses in specific zoned areas.</p>

Table 1.G.24
Are you aware of any questionable practices or barriers to fair housing choice in zoning laws?

1. Northeast Ohio Region
 2013 Fair Housing Survey Data

Comments:
<p>Actually Geauga County Commissioners are quite open and active in placing homes for the developmentally disabled</p> <p>Around Wick Park, a commercial owner asked me to help her find a suitable location for a purposed group home looking to locate to an adjacent corner from her office. Told her no, will not help her now that I know what she was up too. Against the law for me and I walked. And, this person is an attorney and major landlord of many inferior homes in Youngstown. She builds home on a variety of grants and takes advantage of manipulating the public when she sells these homes or charges out rent to the low income tenants, Bad news here!</p> <p>at what point does someone else's rights supplant mine - especially in regard to property?</p> <p>Group homes and other such uses are restricted and need to be heard before the Board of Zoning Appeals</p> <p>Inadequate.</p> <p>It is becoming less of an issue now</p> <p>Laws are not followed in Canfield.</p> <p>Laws that restrict placement of group homes</p> <p>Often group homes are a "conditional use".</p> <p>Pretty much the same at number 1</p> <p>Problems with group homes in residential communities.</p> <p>Prohibition of group homes. Restrictive definitions of families.</p> <p>Religious community for whom I work are being challenged for wanting to build moderate income apartments in their motherhouse, despite the fact that the residences in question sit on land the community used to own. When they tried to build a senior apt bldg years ago locals had the land declared wet lands, then the developer that wanted to put high end homes on it got it reversed.</p> <p>Same as above for multifamily housing.</p> <p>The City of Green keeps trying to limit multi-family rental housing as do other communities.</p> <p>Zoning and Spacing requirements limit the placement of group homes</p> <p>Zoning laws restrict minimum square footage to large single family homes</p>

Table 1.G.25**Are you aware of any questionable practices or barriers to fair housing choice in occupancy standards or health and safety codes?**

1. Northeast Ohio Region
2013 Fair Housing Survey Data

Comments:

Certain suburbs are more active in monitoring and forcing the correction of health and safety codes than others. There is often more attention paid to higher income subsections of the community.
Code enforcement rarely occurs here
Codes have not been enforced in low-income neighborhoods for years. It is getting better.
equality under the law!
Inadequate code enforcement in communities of color and immigrant communities.
No ability to enforce health codes in rental properties
Probably decades out of date.
Restrictions on definition of family, overly restrictive occupancy
Russell Township recently adopted an extremely limited definition of family in an effort to keep out "house-mates".
See box 2 above.
The community that I live in is not immigrant but low income and high poverty and the homes are not up to code and codes are not enforced. Health department does not enforce violations
There are health and safety code violations that are not adequately enforced in low income minority communities due to the impact of the housing crisis (foreclosed/substandard housing) in many of these areas. The volume of housing issues outweighs our ability to police.
This is more a matter of selective enforcement. The City of Kent enforces their occupancy standard where they feel students might choose to live.
Unsure, but there may be concerns more around migrant workers.

Table 1.G.26**Are you aware of any questionable practices or barriers to fair housing choice in property tax policies?**

1. Northeast Ohio Region
2013 Fair Housing Survey Data

Comments:

City of Youngstown, especially around the YSU and Wick Park areas.
County provides funding on an as needed basis for accessibility through CDBG funds and is becoming better equipped in identifying partners that can assist in funding these needs as well.
Disinvestment and foreclosures resulting from lending discrimination result in diminished property values in minority neighborhoods. In this area look to where the cities choose to spend their CDBG funds. The biggest need is in the oldest sections of town, which is where the lowest level of public spending occurs. When redevelopment does occur, little attention is given to where the lowest income families will be moved to or the condition of their new housing.
Lack of tax incentives for making home improvements
Modifications cost the private owner money and yet there are many cases where the person requesting the mods have very little disposable income
No Lake County community is currently providing tax incentives to plan or construct the amount of required Universal Design housing that will be required for the vast increase that baby boomers will need within ten years.
Republicans have run Ohio for too long to update them.
Septic
Why?

Table 1.G.27**Are you aware of any questionable practices or barriers to fair housing choice in the permitting process?**

1. Northeast Ohio Region
2013 Fair Housing Survey Data

Comments:
<p>Ahem....this is America. Those who come here need to assimilate. Offering alternate language documents only serves to delay this process.</p> <p>Barriers are found wherever housing for persons with disabilities is being developed.</p> <p>I am not aware of a community that has translated forms into Spanish within the County.</p> <p>Permits denied based on protected class or segregated neighborhood. Permit requirements not followed in segregated neighborhoods.</p> <p>The language of business in Ohio is English. We don't ask they give up their own practices or religion, but they came to this country and I believe they should assimilate to our language at the very least.</p> <p>Warren probably does not do it. They are required to have an interpreter on call.</p> <p>we do not currently offer permitting process information in alternative languages via the internet or otherwise.</p> <p>What language hosul it be, Spanish? what about the French Itlaian or Serbian, Russian native speaker. It gets ridiculous. It becomes the responsibility of the foreign speaker to get some one that speaks English to translate it for him or her. .</p> <p>Why?</p>

Table 1.G.28**Are you aware of any questionable practices or barriers to fair housing choice in housing construction standards?**

1. Northeast Ohio Region
2013 Fair Housing Survey Data

Comments:
<p>A property owner should be able to construct housing units with a minimum of government intrusion/red tape.</p> <p>Although accessibility requirements are in the Ohio Building Codes, the local building inspectors have no training on those standards, and approve plans that are not accessible</p> <p>But sometimes, the permitting agencies don't know the standards thoroughly.</p> <p>Lack of enforcement. Building officials don't have to certify that residences are accessible prior to construction or occupancy permitting.</p> <p>Lake County Building Deaprtment has a track record of being counterproductive in their interaction with the building and design communities. Assistance in understanding guidelines are blocked because of this department's adversarial leadership</p> <p>Most Building Deaprtments and architects are able to refer to online standards</p> <p>Septic?</p> <p>State and National Building codes, probably a versions behind.</p> <p>There is a widespread failure to enforce the building code in all of its details.</p> <p>What is your definition of accessible housing?</p>

Table 1.G.29**Are you aware of any questionable practices or barriers to fair housing choice in neighborhood or community development policies?**

1. Northeast Ohio Region
2013 Fair Housing Survey Data

Comments:

a great deal of money is devoted to projects in so called "targeted development".
Canfield does not permit low Income housing
City of Youngstown, especailly the YSU and Wick Park areas, and the Wick Neighbors Association, they want everything torn down if they don't like existing commercial bldg's next to reisdential locations, even if the out of town owner has the bldg on the market ot sell.
Community development efforts are too strongly focused on the areas of greatest need. More effort should be made to strengthen areas with some market confidence so that they can remain solid and grow.
Community Development in our area, is very shady and secretive about their work, you can not get a straight forward answer from them? the program has not benefited the community at all, the head of two nonprofit organizations that handle the HUD money is the same person, and he gets paid by both of them, the the housing program is a failure, and I think they should be investigated, due to past problems with mismanagement of money.
Gentrifying neighborhoods focused on eliminating affordable housing, thus a disparate impact on people of color
investments in "trendy" neighborhoods result in displacement of current residents
Isn't that what zoning does - restrict property rights?
Low-income housing is not near to transportation or jobs creating a disparate impact on people of color and females.
policies that encourage development in narrowly defined areas of the community
Policies that encourage economic development without considering the impact on existing residential communities when developments occur in racially or ethnically segregated communities.
The local government does not encourage development that is real and applicable to this area. Developers have a difficult time with so much red tape and lack of incentives.
The lowest income neighborhoods, which most often have the highest concentration of persons in protected classes, get the least amount of monies spent.
We have a master plan, but there is no implementation taken due to the person running the position at present.

Table 1.G.30**Are you aware of any barriers that limit access to government services, such as a lack of transportation or employment services?**

1. Northeast Ohio Region
2013 Fair Housing Survey Data

Comments:

At times the phones are difficult to get through on and if people work during the day, they are unable to get a hold of someone in the evening.
But those public services are all located on bus lines.
for many with low-incomes transportation to various government services can present a problem if the service is located out of their area.
Is it your position that the government must supply transportation and employment services?
lack of affordable public transportation
lack of transportation lack of employment services lack of employment opportunities
Lack of transportation as well as the probability of reduced transportation due to budget cuts in public transportation
lack of transportation or employment services
Limited public transportation.
limited times that the buses run.
no bus routes to many outlying areas of the county
No transportation levy in county so funds for transportation are quite limited
Public education of the availability of HUD assistance programs is not being funded or done.
Public transit is limit, difficult, and hard to navigate..The ticketing machines are next to impossible. Very hard to use. Disparate impact on the poor and people of color.
Public transportation has been shrinking due to budgetary constraints
Public transportation is limited
Public transportation options poor.
RTA eliminated the circulator and reduced routes in community
There is currently no form of public transportation in our county.
There is very limited public transportation (by appointment only). Many officials are parttime and not available to residents at times residents can see them.
transportation
Transportation
Transportation system is biased to the automobile.
Transportation, especially for people with disabilities.
We only have a limited transportation system from the county. It is not enough to serve the needs of the community.
Yes we do not have a public transit system, and most jobs are outside of the city in the rural area, limited transportation is a major problem for our area. Looking for ways to reinstate the public transit, the system that we have in place is not economic sound and does not benefit enough people for cost
Yes, there is a huge lack of public transportation.
Youngstown recently cut back on bus service due to budget cuts.

Table 1.G.31**Are you aware of any questionable practices or barriers to fair housing choice in any other public administrative actions or regulations?**

1. Northeast Ohio Region
2013 Fair Housing Survey Data

Comments:

Barberton limits where group homes can go. Not a permitted use in a residential district.
Canfield zoning Canfield trustees Canfield residents
Certain cities make it more difficult for landlords to rent out the houses. For example, they may impose high Certificate of Occupancy fees in order to make it less attractive.
Definition of family, large lot zoning.
High rental rates are far too high for a town as Warren with hundreds of vacant rental units.
Lake County Building Department is required to lead Fair Housing policies but are blocked because of this department's adversarial leadership
Sustainable construction requirements and LEED residential developments are targeted for high end properties and developments instead of lower income residential projects.
The attitudes of many elected and appointed officials tends to support those with the most money rather than trying to maintain a liveable community for everyone.
There are many jurisdictions within County and cannot be sure how each is performing
There are too many to detail within the scope of this survey.

H. LAND USE PLANNING SURVEY DATA

This section contains data regarding the potential effects of local land use and housing policies on fair housing choice, as gathered from the Fair Housing Survey for Government Officials.

FAIR HOUSING SURVEY FOR GOVERNMENT OFFICIALS

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 was conducted predominately online. Respondents were solicited by mass-distributed emails sent by the NEOSCC, members of the Progress Review Team, and other various organizations in the 12-county region.

This section contains data gathered from the public sector staff in the Northeast Ohio Region that completed the Fair Housing Survey for Government Officials.²

Table 1.H.1
Housing Development
 1. Northeast Ohio Region
 2012 Fair Housing Survey for Government Officials Data

Question: Does your jurisdiction have...	Yes	No	Don't Know	Missing	Total
Housing Development					
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
Occupancy Standards					
A definition for the term "family"?	44	28	24	76	172
Residential occupancy standards or limits?	27	36	30	79	172
Special Needs Housing					
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
Fair Housing Policies					
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

I. IMPEDIMENTS

The *2013 Northeast Ohio Regional Analysis of Impediments to Fair Housing Choice* uncovered several potential issues regarding fair housing in the Northeast Ohio Region. Identification of these items as probable impediments to fair housing choice was based on HUD's definition of impediments as actions, omissions, or decisions that restrict housing choice due to protected class status or actions, omissions, or decisions that have this effect.

² For areas with both nonentitlement and entitlement communities, the results of the nonentitlement community government official survey and the entitlement community interviews were summed.

The identified impediments are supported by evidence uncovered during the Regional AI process, with impediments of higher need being those identified in multiple sources.

These probable impediments in the entirety of the Northeast Ohio Region are presented in **Volumes I and II** of the Regional AI. They are accompanied by suggested actions that jurisdictions in the Region may implement in order to alleviate or eliminate these impediments, and are accompanied by measurable objectives. The goal of these actions and measurable objectives is to assist these agencies in offering greater housing choice for all citizens of the Northeast Ohio Region.

The following list presents the private and public sector impediments found in the Northeast Ohio Region.

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. 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.

IMPEDIMENTS MATRIX

The matrix on the following page includes the impediment, data source, or sources that indicated its existence, protected classes most affected, and ranking of need for action. Level of need for action was determined based on the number of data sources that identified each impediment.

Table 1.I.1
Impediments Matrix
 1. Northeast Ohio 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 ³		
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

³ 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.

2. NOACA REGION

A. CENSUS BUREAU DATA

This section contains additional data from the U.S. Census Bureau.

Table 2.A.1
Population by Age
2. NOACA Region
2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Under 5	141,425	6.6%	120,979	5.8%	-14.5%
5 to 19	455,720	21.2%	414,859	20.0%	-9.0%
20 to 24	116,580	5.4%	119,186	5.7%	2.2%
25 to 34	282,674	13.2%	242,552	11.7%	-14.2%
35 to 54	646,637	30.1%	592,558	28.5%	-8.4%
55 to 64	193,528	9.0%	271,394	13.1%	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%

Table 2.A.2
Elderly Population by Age
2. NOACA Region
2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
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%

Table 2.A.3
Population by Race and Ethnicity
2. NOACA Region
2000 & 2010 Census SF1 Data

Race	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
White	1,634,927	76.1%	1,538,382	74.1%	-5.9%
Black	413,797	19.3%	416,528	20.1%	.7%
American Indian	3,926	.2%	4,056	.2%	3.3%
Asian	30,350	1.4%	40,522	2.0%	33.5%
Native Hawaiian/ Pacific Islander	488	.0%	398	.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%

Table 2.A.4
Disability by Age
 2. NOACA Region
 2010 Three-Year ACS Data

Age	Male		Female		Total	
	Disabled Population	Disability Rate	Disabled Population	Disability Rate	Disabled Population	Disability Rate
Under 5	479	.8%	592	1.0%	1,071	.9%
5 to 17	14,040	7.6%	8,407	4.7%	22,447	6.2%
18 to 34	14,760	7.4%	13,929	6.7%	28,689	7.0%
35 to 64	53,351	12.9%	59,289	13.3%	112,640	13.1%
65 to 74	16,765	24.3%	20,634	24.3%	37,399	24.3%
75 or Older	25,883	46.6%	45,485	50.9%	71,368	49.3%
Total	125,278	12.7%	148,336	13.9%	273,614	13.3%

Table 2.A.5
Employment Status by Disability and Type: Age 18 to 64
 2. NOACA Region
 2010 Three-Year ACS Data

Disability Status	Population
Employed:	910,507
With a disability:	52,806
With a hearing difficulty	13,675
With a vision difficulty	8,597
With a cognitive difficulty	17,381
With an ambulatory difficulty	20,926
With a self-care difficulty	5,969
With an independent living difficulty	12,124
No disability	857,701
Unemployed:	101,515
With a disability:	14,402
With a hearing difficulty	2,262
With a vision difficulty	2,151
With a cognitive difficulty	7,194
With an ambulatory difficulty	5,770
With a self-care difficulty	1,568
With an independent living difficulty	3,911
No disability	87,113
Not in labor force:	255,679
With a disability:	74,121
With a hearing difficulty	10,232
With a vision difficulty	11,284
With a cognitive difficulty	36,304
With an ambulatory difficulty	46,244
With a self-care difficulty	18,354
With an independent living difficulty	37,156
No disability	181,558
Total	1,267,701

Table 2.A.6
Households by Income

2. NOACA 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	132,221	15.5%	122,033	14.4%
\$15,000 to \$19,999	52,357	6.1%	48,223	5.7%
\$20,000 to \$24,999	55,887	6.5%	47,821	5.7%
\$25,000 to \$34,999	108,593	12.7%	91,975	10.9%
\$35,000 to \$49,999	141,723	16.6%	123,836	14.6%
\$50,000 to \$74,999	171,989	20.2%	157,235	18.6%
\$75,000 to \$99,999	92,133	10.8%	102,030	12.1%
\$100,000 or More	98,484	11.5%	152,968	18.1%
Total	853,387	100.0%	846,121	100.0%

Table 2.A.7
Poverty by Age

2. NOACA Region
2000 Census SF3 & 2010 Five-Year ACS Data

Age	2000 Census		2010 Five-Year ACS	
	Persons in Poverty	% of Total	Persons in Poverty	% of Total
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%
Total	226,498	100.0%	281,442	100.0%
Poverty Rate	10.8%	.	13.8%	.

Table 2.A.8
Households by Year Home Built

2. NOACA Region
2000 Census SF3 & 2010 Five-Year ACS Data

Year Built	2000 Census		2010 Five-Year ACS	
	Households	% of Total	Households	% of Total
1939 or Earlier	201,118	23.6%	193,312	22.8%
1940 to 1949	95,502	11.2%	72,439	8.6%
1950 to 1959	170,875	20.0%	166,213	19.6%
1960 to 1969	130,753	15.3%	114,008	13.5%
1970 to 1979	115,922	13.6%	110,444	13.1%
1980 to 1989	60,744	7.1%	58,254	6.9%
1990 to 1999	78,251	9.2%	74,922	8.9%
2000 to 2004	.	.	39,373	4.7%
2005 or Later	.	.	17,156	2.0%
Total	853,165	100.0%	846,121	100.0%

Table 2.A.9
Housing Units by Type

2. NOACA Region
2000 Census SF3 & 2010 Five-Year ACS Data

Unit Type	2000 Census		2010 Five-Year ACS	
	Units	% of Total	Units	% of Total
Single-Family	630,903	69.2%	670,546	70.4%
Duplex	68,745	7.5%	70,145	7.4%
Tri- or Four-Plex	32,266	3.5%	30,576	3.2%
Apartment	168,259	18.5%	170,255	17.9%
Mobile Home	11,084	1.2%	10,888	1.1%
Boat, RV, Van, Etc.	99	.0%	190	.0%
Total	911,356	100.0%	952,600	100.0%

Table 2.A.10
Housing Units by Tenure

2. NOACA Region
2000 & 2010 Census SF1 Data

Tenure	2000 Census		2010 Census		% Change 00–10
	Units	% of Total	Units	% of Total	
Occupied Housing Units	853,165	93.6%	854,893	89.4%	.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%
Total Housing Units	911,356	100.0%	955,756	100.0%	4.9%

Table 2.A.11
Disposition of Vacant Housing Units

2. NOACA Region
2000 & 2010 Census SF1 Data

Disposition	2000 Census		2010 Census		% Change 00–10
	Units	% of Total	Units	% of Total	
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%	-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%

Table 2.A.12
Households by Household Size

2. NOACA Region
2000 & 2010 Census SF1 Data

Size	2000 Census		2010 Census		% Change 00–10
	Households	% of Total	Households	% of Total	
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%	.2%

Table 2.A.13
Household Type by Tenure
 2. NOACA Region
 2000 & 2010 Census SF1 Data

Household Type	2000 Census		2010 Census		% Change 00–10
	Households	% of Total	Households	% of Total	
Family Households	560,570	65.7%	536,325	62.7%	-4.3%
Married-Couple Family	409,187	73.0%	372,601	69.5%	-8.9%
Owner-Occupied	353,197	86.3%	323,611	86.9%	-8.4%
Renter-Occupied	55,990	13.7%	48,990	13.1%	-12.5%
Other Family	151,383	27.0%	163,724	30.5%	8.2%
Male Householder, No Spouse	32,748	21.6%	37,839	23.1%	15.5%
Owner-Occupied	20,205	61.7%	22,367	59.1%	10.7%
Renter-Occupied	12,543	38.3%	15,472	40.9%	23.4%
Female Householder, No Spouse	118,635	78.4%	125,885	76.9%	6.1%
Owner-Occupied	59,746	50.4%	58,948	46.8%	-1.3%
Renter-Occupied	58,889	49.6%	66,937	53.2%	13.7%
Non-Family Households	292,595	34.3%	318,568	37.3%	8.9%
Owner-Occupied	147,724	50.5%	164,938	51.8%	11.7%
Renter-Occupied	144,871	49.5%	153,630	48.2%	6.0%
Total	853,165	100.0%	854,893	100.0%	.2%

Table 2.A.14
Group Quarters Population
 2. NOACA Region
 2000 & 2010 Census SF1 Data

Group Quarters Type	2000 Census		2010 Census		% Change 00-10
	Population	% of Total	Population	% of Total	
Institutionalized					
Correctional Institutions	7,838	28.9%	8,059	31.8%	2.8%
Juvenile Facilities	.	.	1,265	5.0%	.
Nursing Homes	17,192	63.3%	15,804	62.3%	-8.1%
Other Institutions	2,135	7.9%	225	.9%	-89.5%
Total	27,165	100.0%	25,353	100.0%	-6.7%
Noninstitutionalized					
College Dormitories	8,805	51.9%	10,934	60.5%	24.2%
Military Quarters	11	.1%	24	.1%	118.2%
Other Noninstitutional	8,147	48.0%	7,120	39.4%	-12.6%
Total	16,963	38.4%	18,078	41.6%	6.6%
Total Group Quarters Population	44,128	100.0%	43,431	100.0%	-1.6%

Table 2.A.15
Overcrowding and Severe Overcrowding
 2. NOACA Region
 2000 Census SF3 & 2010 Five-Year ACS Data

Data Source	No Overcrowding		Overcrowding		Severe Overcrowding		Total
	Households	% of Total	Households	% of Total	Households	% of Total	
Owner							
2000 Census	575,561	99.1%	4,270	.7%	1,047	.2%	580,878
2010 ACS	572,560	99.4%	2,880	.5%	480	.1%	575,920
Renter							
2000 Census	263,441	96.8%	5,975	2.2%	2,871	1.1%	272,287
2010 ACS	265,263	98.2%	3,771	1.4%	1,167	.4%	270,201
Total							
2000 Census	839,002	98.3%	10,245	1.2%	3,918	.5%	853,165
2010 ACS	837,823	99.0%	6,651	.8%	1,647	.2%	846,121

Table 2.A.16
Households with Incomplete Plumbing Facilities
 2. NOACA Region
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Plumbing Facilities	849,780	842,039
Lacking Complete Plumbing Facilities	3,385	4,082
Total Households	853,165	846,121
Percent Lacking	.4%	.5%

Table 2.A.17
Households with Incomplete Kitchen Facilities
 2. NOACA Region
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Kitchen Facilities	848,363	837,873
Lacking Complete Kitchen Facilities	4,802	8,248
Total Households	853,165	846,121
Percent Lacking	.6%	1.0%

Table 2.A.18
Cost Burden and Severe Cost Burden by Tenure
 2. NOACA Region
 2000 Census & 2010 Five-Year ACS Data

Data Source	Less Than 30%		31%-50%		Above 50%		Not Computed		Total
	Households	% of Total	Households	% of Total	Households	% of Total	Households	% of Total	
Owner With a Mortgage									
2000 Census	263,610	73.2%	63,071	17.5%	31,754	8.8%	1,445	.4%	359,880
2010 ACS	260,382	64.7%	89,198	22.2%	51,434	12.8%	1,427	.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 ACS	140,063	80.7%	19,642	11.3%	12,252	7.1%	1,522	.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 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 ACS	523,928	61.9%	166,419	19.7%	133,839	15.8%	21,935	2.6%	846,121

Table 2.A.19
Median Housing Costs
 2. NOACA Region
 2000 Census SF3 & 2010 Five-Year ACS Data

Housing Cost	2000 Census	2010 ACS
Median Contract Rent	\$2,485	\$3,021
Median Home Value	\$683,600	\$858,500

B. BEA DATA

This section contains additional Bureau of Economic Analysis (BEA) data that address employment and income.

Table 2.B.1
Employment by Industry
 2. NOACA Region
 Select Years 2001–2010 BEA Data

NAICS Categories	2001	2005	2006	2007	2008	2009	2010	% Change 01–10
Farm employment	6,240	5,220	5,274	5,374	4,683	4,831	4,736	-24.1%
Forestry, fishing, related activities, and other	1,022	774	749	(D) ⁴	880	176	345	-66.2%
Mining	1,159	340	375	(D)	474	262	396	-65.8%
Utilities	3,466	3,702	3,560	3,854	3,847	3,612	3,133	-9.6%
Construction	63,553	65,687	63,892	63,699	60,973	55,620	52,947	-16.7%
Manufacturing	183,307	152,776	151,391	147,148	142,786	123,026	121,558	-33.7%
Wholesale trade	60,942	58,797	60,381	56,153	54,587	50,711	49,463	-18.8%
Retail trade	137,380	129,860	129,139	128,873	126,691	121,379	118,731	-13.6%
Transportation and warehousing	33,048	33,501	33,858	38,746	37,662	33,958	33,410	1.1%
Information	26,741	22,500	22,106	21,950	21,264	19,577	18,987	-29.0%
Finance and insurance	74,747	71,723	71,460	72,508	72,283	74,129	74,539	-.3%
Real estate and rental and leasing	44,311	52,219	51,844	51,555	51,131	50,477	50,190	13.3%
Professional and technical services	82,439	82,348	84,002	86,828	86,948	81,939	80,214	-2.7%
Management of companies and enterprises	18,411	23,317	24,746	23,660	23,913	22,779	22,734	23.5%
Administrative and waste services	78,595	80,987	82,480	83,866	82,520	76,617	79,196	.8%
Educational services	29,271	35,389	36,082	36,629	37,439	39,588	40,211	37.4%
Health care and social assistance	146,089	157,456	161,609	166,205	169,053	172,713	176,105	20.5%
Arts, entertainment, and recreation	24,302	24,876	24,806	25,453	25,373	25,300	25,396	4.5%
Accommodation and food services	81,655	82,666	84,519	83,485	82,206	79,158	78,977	-3.3%
Other services, except public administration	67,347	65,734	65,880	66,440	65,781	64,364	63,223	-6.1%
Government and government enterprises	149,902	147,730	147,955	149,145	149,029	147,110	145,798	-2.7%
Total	1,318,974	1,303,194	1,312,017	1,318,238	1,305,178	1,254,584	1,247,466	-5.4%

⁴ (D): These data are not shown to avoid disclosure of confidential information, but estimates are included in the totals.

Table 2.B.2
Real Earnings by Industry

2. NOACA Region
 Select Years 2001–2010 BEA Data, Real 2011 Dollars

NAICS Categories	2001	2005	2006	2007	2008	2009	2010	% Change 00–10
Farm earnings	155,867	145,447	90,630	108,949	93,150	109,369	77,881	-50.0%
Forestry, fishing, related activities, and other	29,752	17,254	17,659	(D) ⁵	19,016	2,797	4,975	-83.3%
Mining	281,104	22,294	20,662	(D)	15,357	3,160	3,452	-98.8%
Utilities	318,200	417,965	413,353	432,099	468,153	456,014	371,038	16.6%
Construction	3,676,059	3,601,825	3,542,426	3,217,409	3,081,457	2,754,128	2,716,750	-26.1%
Manufacturing	12,966,786	11,587,121	11,489,071	11,086,880	11,356,769	9,261,226	10,259,889	-20.9%
Wholesale trade	4,590,585	4,613,303	4,760,777	4,619,850	4,491,505	4,055,217	4,115,702	-10.3%
Retail trade	4,326,997	4,024,323	3,926,554	3,917,188	3,673,696	3,554,154	3,536,409	-18.3%
Transportation and warehousing	1,722,771	2,063,276	1,998,714	2,137,852	2,048,672	1,828,054	1,846,238	7.2%
Information	1,642,473	1,469,798	1,419,998	1,411,277	1,358,768	1,219,416	1,217,855	-25.9%
Finance and insurance	5,130,119	5,143,280	5,265,790	5,099,625	4,637,903	4,608,536	4,534,796	-11.6%
Real estate and rental and leasing	1,473,978	1,544,541	1,323,067	1,114,608	1,335,675	1,441,801	1,343,722	-8.8%
Professional and technical services	6,416,811	6,101,234	6,195,539	6,368,506	6,665,623	5,954,904	5,944,549	-7.4%
Management of companies and enterprises	1,680,322	2,295,069	2,551,133	2,480,056	2,420,109	2,168,285	2,392,493	42.4%
Administrative and waste services	2,437,155	2,629,691	2,708,540	2,845,501	2,717,685	2,435,047	2,577,732	5.8%
Educational services	1,089,234	1,265,299	1,275,889	1,249,335	1,276,487	1,316,831	1,310,059	20.3%
Health care and social assistance	7,168,164	7,974,347	8,297,794	8,141,095	8,509,719	8,763,933	9,019,713	25.8%
Arts, entertainment, and recreation	901,659	834,135	818,491	850,308	865,524	859,671	889,440	-1.4%
Accommodation and food services	1,695,318	1,708,409	1,709,830	1,731,183	1,638,271	1,570,664	1,640,872	-3.2%
Other services, except public administration	2,349,933	2,271,269	2,214,073	2,217,533	2,132,268	2,044,833	2,061,591	-12.3%
Government and government enterprises	9,074,030	9,668,023	9,525,040	9,589,380	9,640,640	9,701,102	9,708,616	7.0%
Total	69,372,466	69,868,333	70,103,061	69,153,086	69,493,322	64,526,831	66,034,437	-4.8%

⁵ (D): These data are not shown to avoid disclosure of confidential information, but estimates are included in the totals.

Table 2.B.3
Real Earnings Per Job by Industry
 2. NOACA Region
 Select Years 2001–2010 BEA Data, 1,000's of Real 2011 Dollars

NAICS Categories	2001	2005	2006	2007	2008	2009	2010	% Change 00–10
Farm earnings	24,979	27,863	17,184	20,273	19,891	22,639	16,444	-34.2%
Forestry, fishing, related activities, and other	29,112	22,291	23,577	(D) ⁶	21,609	15,890	14,420	-50.5%
Mining	242,540	65,569	55,100	(D)	32,400	12,062	8,718	-96.4%
Utilities	91,806	112,903	116,111	112,117	121,693	126,250	118,429	29.0%
Construction	57,842	54,833	55,444	50,510	50,538	49,517	51,311	-11.3%
Manufacturing	70,738	75,844	75,890	75,345	79,537	75,279	84,403	19.3%
Wholesale trade	75,327	78,462	78,846	82,273	82,282	79,967	83,208	10.5%
Retail trade	31,497	30,990	30,406	30,396	28,997	29,281	29,785	-5.4%
Transportation and warehousing	52,129	61,588	59,032	55,176	54,396	53,833	55,260	6.0%
Information	61,422	65,324	64,236	64,295	63,900	62,288	64,141	4.4%
Finance and insurance	68,633	71,710	73,689	70,332	64,163	62,169	60,838	-11.4%
Real estate and rental and leasing	33,264	29,578	25,520	21,620	26,123	28,564	26,773	-19.5%
Professional and technical services	77,837	74,091	73,755	73,346	76,662	72,675	74,109	-4.8%
Management of companies and enterprises	91,267	98,429	103,093	104,821	101,205	95,188	105,239	15.3%
Administrative and waste services	31,009	32,471	32,839	33,929	32,934	31,782	32,549	5.0%
Educational services	37,212	35,754	35,361	34,108	34,095	33,263	32,580	-12.4%
Health care and social assistance	49,067	50,645	51,345	48,982	50,338	50,743	51,218	4.4%
Arts, entertainment, and recreation	37,102	33,532	32,996	33,407	34,112	33,979	35,023	-5.6%
Accommodation and food services	20,762	20,666	20,230	20,736	19,929	19,842	20,777	.1%
Other services, except public administration	34,893	34,552	33,608	33,376	32,415	31,770	32,608	-6.5%
Government and government enterprises	60,533	65,444	64,378	64,296	64,690	65,945	66,590	10.0%
Average	52,596	53,613	53,432	52,459	53,244	51,433	52,935	.64%

⁶ (D): These data are not shown to avoid disclosure of confidential information, but estimates are included in the totals.

Table 2.B.4
Total Employment and Real Personal Income
 2. NOACA Region
 1969–2010 BEA Data, 2011 Dollars

Year	1,000s of 2011 Dollars						Per Capita Income	Total Employment	Real Average Earnings Per Job
	Earnings	Social Security Contributions	Residents Adjustments	Dividends, Interest, Rents	Transfer Payments	Personal Income			
1969	44,677,674	3,025,477	-1,436,114	6,749,915	3,290,887	50,256,885	21,805	1,091,630	40,927
1970	43,223,984	2,865,730	-1,292,319	6,865,099	3,692,118	49,623,151	21,400	1,076,814	40,141
1971	42,610,255	2,899,831	-1,310,124	6,924,324	4,210,482	49,535,106	21,420	1,044,149	40,809
1972	44,293,711	3,179,466	-1,382,135	6,989,407	4,446,611	51,168,128	22,466	1,053,824	42,031
1973	46,744,422	3,887,018	-1,527,602	7,262,401	4,850,623	53,442,826	23,584	1,095,299	42,677
1974	46,713,471	4,001,056	-1,604,522	7,594,622	5,224,631	53,927,146	23,993	1,114,246	41,924
1975	44,112,059	3,674,920	-1,599,601	7,302,631	5,879,515	52,019,683	23,248	1,077,447	40,941
1976	46,198,455	3,920,397	-1,784,190	7,319,896	5,888,153	53,701,917	24,191	1,088,064	42,459
1977	49,053,342	4,136,403	-2,034,563	7,580,215	5,815,153	56,277,743	25,423	1,114,106	44,029
1978	51,102,671	4,451,800	-2,234,051	8,006,928	5,864,858	58,288,606	26,412	1,148,501	44,495
1979	51,369,251	4,663,315	-2,362,013	8,450,449	6,123,785	58,918,157	26,970	1,159,618	44,298
1980	48,755,071	4,394,183	-2,316,446	9,341,939	7,164,740	58,551,121	26,952	1,133,734	43,004
1981	47,558,800	4,582,569	-2,307,587	10,534,399	7,191,980	58,395,023	27,008	1,112,891	42,734
1982	45,184,794	4,413,978	-2,165,868	11,135,233	7,873,722	57,613,903	26,789	1,072,341	42,137
1983	45,242,371	4,510,931	-2,138,986	11,534,370	8,151,012	58,277,836	27,150	1,058,826	42,729
1984	47,894,203	4,903,022	-2,255,737	12,615,279	8,177,479	61,528,201	28,734	1,090,297	43,928
1985	49,384,216	5,140,296	-2,315,643	12,940,664	8,417,487	63,286,427	29,695	1,106,952	44,613
1986	50,152,268	5,399,310	-2,302,322	12,936,684	8,757,242	64,144,562	30,248	1,123,074	44,656
1987	51,526,363	5,554,656	-2,346,343	12,856,364	8,820,292	65,302,020	30,892	1,145,205	44,993
1988	54,260,211	5,970,224	-2,433,922	13,178,119	8,904,053	67,938,237	32,320	1,171,445	46,319
1989	54,926,143	6,124,811	-2,511,577	13,908,095	9,147,962	69,345,811	32,964	1,194,435	45,985
1990	55,794,796	6,355,752	-2,591,093	14,835,661	9,697,091	71,380,702	33,922	1,206,598	46,241
1991	54,649,047	6,342,554	-2,529,186	14,233,058	10,062,831	70,073,195	33,092	1,192,489	45,828
1992	56,175,603	6,491,275	-2,620,466	13,606,068	10,674,626	71,344,556	33,479	1,181,133	47,561
1993	56,961,561	6,639,277	-2,621,117	13,813,878	10,914,275	72,429,321	33,839	1,195,585	47,643
1994	59,335,859	6,998,987	-2,768,045	14,008,155	11,035,971	74,612,954	34,763	1,223,705	48,489
1995	60,638,849	7,200,195	-2,898,689	14,475,813	11,409,763	76,425,541	35,543	1,251,048	48,470
1996	61,253,072	7,222,283	-3,010,844	15,238,811	11,530,772	77,789,529	36,121	1,268,542	48,286
1997	63,392,608	7,335,664	-3,295,289	15,980,251	11,673,781	80,415,686	37,356	1,290,060	49,139
1998	66,438,956	7,448,577	-3,576,807	17,259,035	11,669,424	84,342,030	39,200	1,308,642	50,769
1999	68,972,819	7,653,374	-3,971,351	16,607,402	11,826,160	85,781,656	39,900	1,325,778	52,024
2000	70,998,106	7,587,735	-4,199,754	16,830,850	12,252,007	88,293,473	41,114	1,340,411	52,967
2001	69,372,466	7,439,065	-3,993,708	15,798,683	12,909,166	86,647,542	40,456	1,318,974	52,596
2002	68,600,205	7,159,685	-3,817,342	15,075,712	13,458,812	86,157,702	40,332	1,292,744	53,066
2003	69,876,272	7,321,555	-3,864,145	13,453,611	13,757,125	85,901,309	40,307	1,292,129	54,078
2004	70,960,466	7,541,551	-3,914,794	13,374,060	13,901,041	86,779,223	40,877	1,299,535	54,605
2005	69,868,333	7,457,146	-3,820,019	13,609,189	14,079,037	86,279,394	40,858	1,303,194	53,613
2006	70,103,061	7,558,058	-3,803,571	14,905,333	14,318,136	87,964,901	41,900	1,312,017	53,432
2007	69,153,086	7,494,364	-3,715,768	15,560,452	14,745,118	88,248,524	42,192	1,318,238	52,459
2008	69,493,322	7,628,956	-3,505,161	16,033,472	15,440,178	89,832,855	43,083	1,305,178	53,244
2009	64,526,831	7,305,685	-3,276,768	12,889,442	17,094,983	83,928,804	40,330	1,254,584	51,433
2010	66,034,437	7,385,514	-3,363,064	12,993,441	17,592,860	85,872,160	41,373	1,247,466	52,935

C. BLS DATA

This section contains Bureau of Labor Statistics (BLS) data that address employment and income.

Table 2.C.1
Labor Force Statistics
 2. NOACA Region
 1990–2011 BLS Data

Year	Labor Force	Employment	Unemployment	Unemployment Rate	Statewide Unemployment Rate
1990	1,038,126	977,409	60,717	5.8%	5.7%
1991	1,021,995	950,993	71,002	6.9%	6.6%
1992	1,036,234	953,833	82,401	8.0%	7.4%
1993	1,047,133	970,976	76,157	7.3%	6.7%
1994	1,061,358	991,448	69,910	6.6%	5.6%
1995	1,064,553	1,006,811	57,742	5.4%	4.9%
1996	1,071,683	1,019,970	51,713	4.8%	5.0%
1997	1,087,941	1,038,381	49,560	4.6%	4.6%
1998	1,099,727	1,054,165	45,562	4.1%	4.3%
1999	1,113,103	1,066,600	46,503	4.2%	4.3%
2000	1,105,888	1,062,855	43,033	3.9%	4.0%
2001	1,108,246	1,059,727	48,519	4.4%	4.4%
2002	1,105,536	1,045,636	59,900	5.4%	5.7%
2003	1,105,555	1,039,412	66,143	6.0%	6.2%
2004	1,096,866	1,031,672	65,194	5.9%	6.1%
2005	1,091,575	1,029,126	62,449	5.7%	5.9%
2006	1,093,710	1,033,395	60,315	5.5%	5.4%
2007	1,101,169	1,034,424	66,745	6.1%	5.6%
2008	1,100,367	1,026,186	74,181	6.7%	6.5%
2009	1,084,374	988,723	95,651	8.8%	10.1%
2010	1,080,862	986,439	94,423	8.7%	10.0%
2011	1,082,818	999,486	83,332	7.7%	8.6%

D. HMDA DATA

The Home Mortgage Disclosure Act (HMDA) requires both depository and non-depository lenders to collect and publicly disclose information about housing-related loans and loan applications.⁷ The information presented in this section presents detailed HMDA data, including denial rates and predatory lending including high annual percentage rate (APR) loans.

Table 2.D.1
Purpose of Loan by Year
2. NOACA Region
2004–2011 HMDA Data

Purpose	2004	2005	2006	2007	2008	2009	2010	2011	Total
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
Total	209,937	218,184	189,957	135,871	93,036	103,476	92,759	83,960	1,127,180

Table 2.D.2
Occupancy Status for Home Purchase Loan Applications
2. NOACA Region
2004–2011 HMDA Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	Total
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
Total	69,464	79,904	76,175	50,408	33,884	31,515	27,385	24,821	393,556

Table 2.D.3
Owner-Occupied Home Purchase Loan Applications by Loan Type
2. NOACA Region
2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Conventional	53,577	62,120	58,762	37,902	16,870	12,280	10,748	10,631	262,890
FHA - Insured	6,802	6,018	4,763	4,935	12,917	16,203	14,025	11,245	76,908
VA - Guaranteed	847	867	741	712	1,084	1,246	1,093	1,233	7,823
Rural Housing Service or Farm Service Agency	20	28	20	53	109	346	258	312	1,146
Total	61,246	69,033	64,286	43,602	30,980	30,075	26,124	23,421	348,767

⁷ Data are considered “raw” because they contain entry errors and incomplete loan applications. Starting in 2004, the HMDA data made substantive changes in reporting. It modified the way it handled Hispanic data, loan interest rates, and the reporting of multifamily loan applications.

DENIAL RATES

Table 2.D.4
Loan Applications by Action Taken
 2. NOACA Region
 2004–2011 HMDA Data

Action	2004	2005	2006	2007	2008	2009	2010	2011	Total
Loan Originated	35,244	38,039	32,622	22,799	16,676	15,055	13,424	11,843	185,702
Application Approved but not Accepted	4,151	4,125	3,894	2,383	1,177	741	716	620	17,807
Application Denied	5,735	7,902	8,547	5,455	3,080	2,002	1,919	1,805	36,445
Application Withdrawn by Applicant	3,888	4,710	4,254	1,985	1,630	1,381	1,282	1,235	20,365
File Closed for Incompleteness	1,035	1,112	971	768	397	294	343	226	5,146
Loan Purchased by the Institution	11,193	13,044	13,959	10,158	7,992	10,596	8,439	7,692	83,073
Preapproval Request Denied	0	101	39	54	28	6	1	0	229
Preapproval Approved but not Accepted	0	0	0	0	0	0	0	0	0
Total	61,246	69,033	64,286	43,602	30,980	30,075	26,124	23,421	348,767
Denial Rate	14.0%	17.2%	20.8%	19.3%	15.6%	11.7%	12.5%	13.2%	16.4%

Table 2.D.5
Denial Rates by Gender of Applicant
 2. NOACA Region
 2004–2011 HMDA Data

Year	Male	Female	Not Available	Not Applicable	Average
2004	11.9%	15.6%	42.4%	13.3%	14.0%
2005	14.8%	19.7%	37.1%	16.7%	17.2%
2006	17.7%	24.9%	33.6%	11.1%	20.8%
2007	16.4%	23.2%	32.0%	40.0%	19.3%
2008	14.4%	16.9%	23.9%	33.3%	15.6%
2009	10.7%	12.5%	21.9%	.0%	11.7%
2010	11.1%	14.4%	18.0%	.0%	12.5%
2011	12.0%	14.5%	21.4%	.0%	13.2%
Average	14.2%	19.0%	31.2%	19.4%	16.4%

Table 2.D.6
Loan Applications by Selected Action Taken by Gender of Applicant
 2. NOACA Region
 2004–2011 HMDA Data

Gender		2004	2005	2006	2007	2008	2009	2010	2011	Total
Male	Originated	23,302	24,675	20,840	14,868	10,605	9,619	8,570	7,636	120,115
	Denied	3,139	4,284	4,468	2,924	1,779	1,157	1,073	1,037	19,861
	Denial Rate	11.9%	14.8%	17.7%	16.4%	14.4%	10.7%	11.1%	12.0%	14.2%
Female	Originated	11,234	12,386	10,731	7,162	5,500	4,946	4,265	3,679	59,903
	Denied	2,083	3,046	3,551	2,168	1,120	709	717	625	14,019
	Denial Rate	15.6%	19.7%	24.9%	23.2%	16.9%	12.5%	14.4%	14.5%	19.0%
Not Available	Originated	695	963	1,043	763	563	486	587	526	5,626
	Denied	511	569	527	359	177	136	129	143	2,551
	Denial Rate	42.4%	37.1%	33.6%	32.0%	23.9%	21.9%	18.0%	21.4%	31.2%
Not Applicable	Originated	13	15	8	6	8	4	2	2	58
	Denied	2	3	1	4	4	0	0	0	14
	Denial Rate	13.3%	16.7%	11.1%	40.0%	33.3%	.0%	.0%	.0%	19.4%
Total	Originated	35,244	38,039	32,622	22,799	16,676	15,055	13,424	11,843	185,702
	Denied	5,735	7,902	8,547	5,455	3,080	2,002	1,919	1,805	36,445
	Denial Rate	14.0%	17.2%	20.8%	19.3%	15.6%	11.7%	12.5%	13.2%	16.4%

Table 2.D.7
Denial Rates by Race/Ethnicity of Applicant
 2. NOACA Region
 2004–2011 HMDA Data

Race/Ethnicity	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	21.4%	31.9%	24.3%	26.5%	22.8%	12.2%	20.0%	31.4%	24.7%
Asian	8.7%	9.5%	14.5%	13.3%	13.6%	15.3%	11.8%	15.7%	12.2%
Black	25.2%	33.7%	43.2%	43.8%	32.9%	23.6%	23.8%	27.0%	34.8%
White	10.3%	12.2%	13.1%	12.9%	12.0%	9.6%	10.6%	11.0%	11.7%
Not Available	33.4%	31.4%	36.1%	32.1%	24.8%	19.8%	19.1%	20.7%	29.9%
Not Applicable	12.5%	16.7%	9.1%	50.0%	11.1%	0.0%	0.0%	.0%	13.8%
Average	14.0%	17.2%	20.8%	19.3%	15.6%	11.7%	12.5%	13.2%	16.4%
Non-Hispanic	12.4%	15.6%	19.2%	17.9%	14.8%	11.0%	11.7%	12.5%	15.1%
Hispanic	18.0%	22.1%	23.2%	26.1%	20.0%	14.6%	19.6%	14.8%	20.8%

Table 2.D.8
Loan Applications by Selected Action Taken by Race/Ethnicity of Applicant
 2. NOACA Region
 2004–2011 HMDA Data

Race		2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Originated	103	94	87	50	44	43	28	24	473
	Denied	28	44	28	18	13	6	7	11	155
	Denial Rate	21.4%	31.9%	24.3%	26.5%	22.8%	20.0%	20.0%	31.4%	24.7%
Asian	Originated	717	784	630	507	362	349	321	269	3,939
	Denied	68	82	107	78	57	63	43	50	548
	Denial Rate	8.7%	9.5%	14.5%	13.3%	13.6%	15.3%	11.8%	15.7%	12.2%
Black	Originated	4,084	4,870	4,547	2,548	1,683	1,259	1,059	796	20,846
	Denied	1,374	2,475	3,460	1,985	826	389	330	294	11,133
	Denial Rate	25.2%	33.7%	43.2%	43.8%	32.9%	23.6%	23.8%	27.0%	34.8%
White	Originated	28,231	29,678	25,322	18,303	13,606	12,548	11,092	9,885	148,665
	Denied	3,242	4,109	3,804	2,715	1,862	1,334	1,321	1,224	19,611
	Denial Rate	10.3%	12.2%	13.1%	12.9%	12.0%	9.6%	10.6%	11.0%	11.7%
Not Available	Originated	2,018	2,598	2,026	1,387	973	852	922	866	11,642
	Denied	1,010	1,189	1,147	655	321	210	218	226	4,976
	Denial Rate	33.4%	31.4%	36.1%	32.1%	24.8%	19.8%	19.1%	20.7%	29.9%
Not Applicable	Originated	91	15	10	4	8	4	2	3	137
	Denied	13	3	1	4	1	0	0	0	22
	Denial Rate	33.4%	31.4%	36.1%	32.1%	24.8%	19.8%	19.1%	20.7%	13.8%
Total	Originated	35,244	38,039	32,622	22,799	16,676	15,055	13,424	11,843	185,702
	Denied	5,735	7,902	8,547	5,455	3,080	2,002	1,919	1,805	36,445
	Denial Rate	14.0%	17.2%	20.8%	19.3%	15.6%	11.7%	12.5%	13.2%	16.4%
Non-Hispanic	Originated	28,930	34,074	29,658	20,779	15,251	13,803	12,217	10,716	165,428
	Denied	4,103	6,306	7,067	4,538	2,639	1,709	1,622	1,530	29,514
	Denial Rate	12.4%	15.6%	19.2%	17.9%	14.8%	11.0%	11.7%	12.5%	15.1%
Hispanic	Originated	927	988	956	647	436	411	329	334	5,028
	Denied	203	281	289	229	109	70	80	58	1,319
	Denial Rate	18.0%	22.1%	23.2%	26.1%	20.0%	14.6%	19.6%	14.8%	20.8%

Table 2.D.9
Loan Applications by Reason for Denial
 2. NOACA Region
 2004–2011 HMDA Data

Denial Reason	2004	2005	2006	2007	2008	2009	2010	2011	Total
Debt-to-Income Ratio	772	931	922	913	587	441	467	402	5,435
Employment History	69	87	127	79	65	47	55	57	586
Credit History	1,209	1,405	1,501	1,237	656	468	461	401	7,338
Collateral	451	639	712	569	562	418	360	324	4,035
Insufficient Cash	116	127	155	113	69	51	61	46	738
Unverifiable Information	158	255	374	303	157	69	70	59	1,445
Credit Application Incomplete	547	632	525	562	214	119	141	202	2,942
Mortgage Insurance Denied	0	5	5	5	17	13	13	7	65
Other	1,111	2,075	1,570	750	306	172	161	132	6,277
Missing	1,302	1,746	2,656	924	447	204	130	175	7,584
Total	5,735	7,902	8,547	5,455	3,080	2,002	1,919	1,805	36,445

Table 2.D.10
Denial Rates by Income of Applicant
 2. NOACA Region
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	48.0%	57.9%	50.3%	55.4%	56.7%	51.8%	49.3%	56.4%	53.0%
\$15,001–\$30,000	23.5%	30.6%	36.8%	34.4%	27.0%	18.8%	21.6%	21.9%	28.2%
\$30,001–\$45,000	16.6%	19.7%	25.4%	24.3%	18.3%	12.0%	14.9%	15.5%	19.4%
\$45,001–\$60,000	13.6%	17.1%	22.1%	19.1%	15.9%	11.2%	10.8%	12.4%	16.4%
\$60,001–\$75,000	10.3%	13.3%	17.2%	16.1%	12.6%	10.4%	10.9%	11.2%	13.3%
Above \$75,000	7.8%	10.2%	12.5%	11.4%	9.8%	7.9%	7.5%	8.9%	9.9%
Data Missing	19.2%	21.8%	16.1%	24.9%	19.8%	20.7%	34.6%	25.5%	20.2%
Total	14.0%	17.2%	20.8%	19.3%	15.6%	11.7%	12.5%	13.2%	16.4%

Table 2.D.11
Denial Rates of Loans by Race/Ethnicity and Income of Applicant
 2. NOACA Region
 2004–2011 HMDA Data

Race	<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	Above \$75K	Data Missing	Average
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%	15.0%	16.7%	28.6%	15.4%	1.6%	37.5%	13.8%
Average	53.0%	28.2%	19.4%	16.4%	13.3%	9.9%	20.2%	16.4%
Non-Hispanic Ethnicity	52.5%	26.5%	18.0%	15.2%	12.3%	9.3%	16.1%	15.1%
Hispanic (Ethnicity)	46.2%	27.1%	22.1%	17.7%	18.7%	11.6%	23.6%	20.8%

Table 2.D.12
Loan Applications by Reason for Denial by Race/Ethnicity of Applicant
 2. NOACA Region
 2004–2011 HMDA Data

Denial Reason	American Indian	Asian	Black	White	Not Available	Not Applicable	Total	Hispanic (Ethnicity)
Debt-to-Income Ratio	20	105	1,514	3,218	576	2	5,435	209
Employment History	2	22	123	391	48	0	586	30
Credit History	46	101	2,369	3,990	830	2	7,338	294
Collateral	18	69	977	2,545	422	4	4,035	148
Insufficient Cash	4	10	177	465	82	0	738	32
Unverifiable Information	7	32	460	788	153	5	1,445	46
Credit Application Incomplete	7	54	683	1,774	422	2	2,942	84
Mortgage Insurance Denied	1	3	11	46	4	0	65	4
Other	24	92	2,168	3,091	900	2	6,277	229
Missing	26	60	2,651	3,303	1,539	5	7,584	243
Total	155	548	11,133	19,611	4,976	22	36,445	1,319
% Missing	16.8%	10.9%	23.8%	16.8%	30.9%	22.7%	20.8%	18.4%

Table 2.D.13
Loan Applications by Income of Applicant: Originated and Denied
 2. NOACA Region
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Loan Originated	131	120	142	79	58	80	70	48	728
	Application Denied	121	165	144	98	76	86	68	62	820
	Denial Rate	48.0%	57.9%	50.3%	55.4%	56.7%	51.8%	49.3%	56.4%	53.0%
\$15,001–\$30,000	Loan Originated	3,736	3,585	2,678	2,063	1,569	1,702	1,469	1,230	18,032
	Application Denied	1,150	1,584	1,558	1,080	581	394	405	345	7,097
	Denial Rate	23.5%	30.6%	36.8%	34.4%	27.0%	18.8%	21.6%	21.9%	28.2%
\$30,001–\$45,000	Loan Originated	8,146	8,766	6,851	4,601	3,703	3,565	2,753	2,359	40,744
	Application Denied	1,619	2,151	2,335	1,479	832	487	482	434	9,819
	Denial Rate	16.6%	19.7%	25.4%	24.3%	18.3%	12.0%	14.9%	15.5%	19.4%
\$45,001–\$60,000	Loan Originated	6,925	7,517	6,294	4,294	3,300	3,003	2,471	2,091	35,895
	Application Denied	1,091	1,549	1,784	1,013	623	380	300	296	7,036
	Denial Rate	13.6%	17.1%	22.1%	19.1%	15.9%	11.2%	10.8%	12.4%	16.4%
\$60,001–\$75,000	Loan Originated	4,757	5,234	4,340	2,956	2,153	1,876	1,649	1,439	24,404
	Application Denied	545	804	901	568	309	217	202	182	3,728
	Denial Rate	10.3%	13.3%	17.2%	16.1%	12.6%	10.4%	10.9%	11.2%	13.3%
Above \$75,000	Loan Originated	10,027	11,605	10,967	8,380	5,735	4,683	4,889	4,553	60,839
	Application Denied	848	1,311	1,566	1,076	620	400	397	444	6,662
	Denial Rate	7.8%	10.2%	12.5%	11.4%	9.8%	7.9%	7.5%	8.9%	9.9%
Data Missing	Loan Originated	1,522	1,212	1,350	426	158	146	123	123	5,060
	Application Denied	361	338	259	141	39	38	65	42	1,283
	Denial Rate	19.2%	21.8%	16.1%	24.9%	19.8%	20.7%	34.6%	25.5%	20.2%
Total	Loan Originated	35,244	38,039	32,622	22,799	16,676	15,055	13,424	11,843	185,702
	Application Denied	5,735	7,902	8,547	5,455	3,080	2,002	1,919	1,805	36,445
	Denial Rate	14.0%	17.2%	20.8%	19.3%	15.6%	11.7%	12.5%	13.2%	16.4%

Table 2.D.14
Loan Applications by Income and Race/Ethnicity of Applicant: Originated and Denied
 2. NOACA Region
 2004–2011 HMDA Data

Race		<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	> \$75K	Data Missing	Total
American Indian	Loan Originated	4	57	96	96	62	145	13	473
	Application Denied	1	43	30	25	17	34	5	155
	Denial Rate	20.0%	43.0%	23.8%	20.7%	21.5%	19.0%	27.8%	24.7%
Asian	Loan Originated	14	256	604	615	468	1,866	116	3,939
	Application Denied	17	82	92	95	67	178	17	548
	Denial Rate	54.8%	24.3%	13.2%	13.4%	12.5%	8.7%	12.8%	12.2%
Black	Loan Originated	94	3,855	6,925	4,503	2,227	2,906	336	20,846
	Application Denied	223	2,654	3,547	2,189	928	1,360	232	11,133
	Denial Rate	70.3%	40.8%	33.9%	32.7%	29.4%	31.9%	40.8%	34.8%
White	Loan Originated	520	12,716	30,707	28,635	20,253	51,601	4,233	148,665
	Application Denied	467	3,343	4,857	3,847	2,249	4,222	626	19,611
	Denial Rate	47.3%	20.8%	13.7%	11.8%	10.0%	7.6%	12.9%	11.7%
Not Available	Loan Originated	95	1,131	2,392	2,031	1,383	4,258	352	11,642
	Application Denied	112	972	1,289	874	465	867	397	4,976
	Denial Rate	54.1%	46.2%	35.0%	30.1%	25.2%	16.9%	53.0%	29.9%
Not Applicable	Loan Originated	1	17	20	15	11	63	10	137
	Application Denied	0	3	4	6	2	1	6	22
	Denial Rate	.0%	15.0%	16.7%	28.6%	15.4%	1.6%	37.5%	13.8%
Total	Loan Originated	728	18,032	40,744	35,895	24,404	60,839	5,060	185,702
	Application Denied	820	7,097	9,819	7,036	3,728	6,662	1,283	36,445
	Denial Rate	53.0%	28.2%	19.4%	16.4%	13.3%	9.9%	20.2%	16.4%
Non-Hispanic Ethnicity	Loan Originated	582	15,594	36,326	32,233	21,997	54,323	4,373	165,428
	Application Denied	642	5,631	7,959	5,799	3,083	5,563	837	29,514
	Denial Rate	52.5%	26.5%	18.0%	15.2%	12.3%	9.3%	16.1%	15.1%
Hispanic (Ethnicity)	Loan Originated	64	1,063	1,363	920	488	994	136	5,028
	Application Denied	55	395	386	198	112	131	42	1,319
	Denial Rate	46.2%	27.1%	22.1%	17.7%	18.7%	11.6%	23.6%	20.8%

PREDATORY LENDING

Table 2.D.15
Originated Owner-Occupied Loans by HAL Status
 2. NOACA Region
 2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Other	30,866	28,810	24,698	19,944	15,197	14,214	13,334	11,796	158,859
HAL	4,378	9,229	7,924	2,855	1,479	841	90	47	26,843
Total	35,244	38,039	32,622	22,799	16,676	15,055	13,424	11,843	185,702
Percent HAL	12.4%	24.3%	24.3%	12.5%	8.9%	5.6%	.7%	.4%	14.5%

Table 2.D.16
Loans by Loan Purpose by HAL Status
 2. NOACA Region
 2004–2011 HMDA Data

Loan Purpose		2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	Other	30,866	28,810	24,698	19,944	15,197	14,214	13,334	11,796	158,859
	HAL	4,378	9,229	7,924	2,855	1,479	841	90	47	26,843
	Percent HAL	12.4%	24.3%	24.3%	12.5%	8.9%	5.6%	.7%	.4%	14.5%
Home Improvement	Other	4,398	4,917	5,185	4,633	3,281	1,734	1,532	1,725	27,405
	HAL	968	1,161	1,222	872	456	266	129	74	5,148
	Percent HAL	18.0%	19.1%	19.1%	15.8%	12.2%	13.3%	7.8%	4.1%	15.8%
Refinancing	Other	36,943	27,797	20,377	16,291	13,496	27,608	28,319	24,382	195,213
	HAL	7,122	10,959	9,249	4,212	1,727	1,212	171	138	34,790
	Percent HAL	16.2%	28.3%	31.2%	20.5%	11.3%	4.2%	.6%	.6%	15.1%
Total	Other	72,207	61,524	50,260	40,868	31,974	43,556	43,185	37,903	381,477
	HAL	12,468	21,349	18,395	7,939	1,479	841	90	47	66,781
	Percent HAL	14.7%	25.8%	26.8%	16.3%	10.3%	5.1%	.9%	.7%	14.9%

Table 2.D.17
HALs Originated by Race of Borrower
 2. NOACA Region
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	12	27	28	7	6	1	0	0	81
Asian	40	77	76	28	13	8	1	0	243
Black	1,290	2,699	2,770	910	282	117	10	3	8,081
White	2,434	5,022	4,276	1,687	1,098	681	76	42	15,316
Not Available	591	1,404	774	223	80	34	3	2	3,111
Not Applicable	11	0	0	0	0	0	0	0	11
Total	4,378	9,229	7,924	2,855	1,479	841	90	47	26,843
Hispanic (Ethnicity)	136	276	315	129	68	37	2	3	966

Table 2.D.18
Rate of HALs Originated by Race/Ethnicity of Borrower
 2. NOACA Region
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	11.7%	28.7%	32.2%	14.0%	13.6%	2.3%	.0%	.0%	17.1%
Asian	5.6%	9.8%	12.1%	5.5%	3.6%	2.3%	.3%	.0%	6.2%
Black	31.6%	55.4%	60.9%	35.7%	16.8%	9.3%	.9%	.4%	38.8%
White	8.6%	16.9%	16.9%	9.2%	8.1%	5.4%	.7%	.4%	10.3%
Not Available	29.3%	54.0%	38.2%	16.1%	8.2%	4.0%	.3%	.2%	26.7%
Not Applicable	12.1%	.0%	.0%	.0%	.0%	.0%	.0%	.0%	8%
Average	12.4%	24.3%	24.3%	12.5%	8.9%	5.6%	0.7%	0.4%	14.5%
Non-Hispanic Ethnicity	11.5%	21.5%	23.2%	12.1%	8.7%	5.6%	.7%	.4%	13.5%
Hispanic (Ethnicity)	14.7%	27.9%	32.9%	19.9%	15.6%	9.0%	.6%	.9%	19.2%

Table 2.D.19
Loans by HAL Status by Race/Ethnicity of Borrower
 2. NOACA Region
 2004–2011 HMDA Data

Race	Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Other	91	67	59	43	38	42	28	24	392
	HAL	12	27	28	7	6	1	0	0	81
	Percent HAL	11.7%	28.7%	32.2%	14.0%	13.6%	2.3%	.0%	.0%	17.1%
Asian	Other	677	707	554	479	349	341	320	269	3,696
	HAL	40	77	76	28	13	8	1	0	243
	Percent HAL	5.6%	9.8%	12.1%	5.5%	3.6%	2.3%	.3%	.0%	6.2%
Black	Other	2,794	2,171	1,777	1,638	1,401	1,142	1,049	793	12,765
	HAL	1,290	2,699	2,770	910	282	117	10	3	8,081
	Percent HAL	31.6%	55.4%	60.9%	35.7%	16.8%	9.3%	.9%	.4%	38.8%
White	Other	25,797	24,656	21,046	16,616	12,508	11,867	11,016	9,843	133,349
	HAL	2,434	5,022	4,276	1,687	1,098	681	76	42	15,316
	Percent HAL	8.6%	16.9%	16.9%	9.2%	8.1%	5.4%	0.7%	0.4%	10.3%
Not Available	Other	1,427	1,194	1,252	1,164	893	818	919	864	8,531
	HAL	591	1,404	774	223	80	34	3	2	3,111
	Percent HAL	29.3%	54.0%	38.2%	16.1%	8.2%	4.0%	.3%	.2%	26.7%
Not Applicable	Other	80	15	10	4	8	4	2	2	126
	HAL	11	0	0	0	0	0	0	0	11
	Percent HAL	12.1%	.0%	.0%	.0%	.0%	.0%	.0%	.0%	8.0%
Total	Other	30,866	28,810	24,698	19,944	15,197	14,214	13,334	11,796	158,859
	HAL	4,378	9,229	7,924	2,855	1,479	841	90	47	26,843
	Percent HAL	12.4%	24.3%	24.3%	12.5%	8.9%	5.6%	.7%	.4%	14.5%
Non-Hispanic Ethnicity	Other	25,613	26,732	22,791	18,257	13,929	13,034	12,133	10,677	143,166
	HAL	3,317	7,342	6,867	2,522	1,322	769	84	39	22,262
	Percent HAL	11.5%	21.5%	23.2%	12.1%	8.7%	5.6%	.7%	.4%	13.5%
Hispanic (Ethnicity)	Other	791	712	641	518	368	374	327	331	4,062
	HAL	136	276	315	129	68	37	2	3	966
	Percent HAL	14.7%	27.9%	32.9%	19.9%	15.6%	9.0%	.6%	.9%	19.2%

Table 2.D.20
Rates of HALs by Income of Borrower
 2. NOACA Region
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Average
\$15,000 or Below	11.5%	15.8%	16.9%	12.7%	24.1%	10.0%	.0%	2.1%	12.5%
\$15,001–\$30,000	21.0%	35.5%	34.4%	21.7%	15.6%	7.9%	1.4%	1.0%	21.3%
\$30,001–\$45,000	17.7%	32.6%	33.0%	17.5%	11.9%	7.9%	.9%	.5%	19.9%
\$45,001–\$60,000	14.9%	29.7%	28.7%	14.2%	10.1%	5.8%	.5%	.3%	17.3%
\$60,001–\$75,000	10.0%	20.9%	24.2%	11.3%	8.0%	5.2%	.5%	.2%	13.3%
Above \$75,000	5.4%	13.0%	13.2%	6.6%	4.6%	3.1%	0.5%	.3%	7.4%
Data Missing	5.8%	20.7%	31.1%	22.8%	5.7%	2.1%	.0%	.0%	17.2%
Average	12.4%	24.3%	24.3%	12.5%	8.9%	5.6%	.7%	.4%	14.5%

Table 2.D.21
Loans by HAL Status by Income of Borrower
 2. NOACA Region
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Other	116	101	118	69	44	72	70	47	637
	HAL	15	19	24	10	14	8	0	1	91
	Percent HAL	11.5%	15.8%	16.9%	12.7%	24.1%	10.0%	.0%	2.1%	12.5%
\$15,001–\$30,000	Other	2,951	2,314	1,756	1,616	1,324	1,568	1,449	1,218	14,196
	HAL	785	1,271	922	447	245	134	20	12	3,836
	Percent HAL	21.0%	35.5%	34.4%	21.7%	15.6%	7.9%	1.4%	1.0%	21.3%
\$30,001–\$45,000	Other	6,701	5,910	4,592	3,794	3,263	3,285	2,727	2,348	32,620
	HAL	1,445	2,856	2,259	807	440	280	26	11	8,124
	Percent HAL	17.7%	32.6%	33.0%	17.5%	11.9%	7.9%	.9%	.5%	19.9%
\$45,001–\$60,000	Other	5,896	5,284	4,487	3,683	2,967	2,829	2,458	2,084	29,688
	HAL	1,029	2,233	1,807	611	333	174	13	7	6,207
	Percent HAL	14.9%	29.7%	28.7%	14.2%	10.1%	5.8%	.5%	.3%	17.3%
\$60,001–\$75,000	Other	4,280	4,140	3,291	2,623	1,980	1,779	1,641	1,436	21,170
	HAL	477	1,094	1,049	333	173	97	8	3	3,234
	Percent HAL	10.0%	20.9%	24.2%	11.3%	8.0%	5.2%	.5%	.2%	13.3%
Above \$75,000	Other	9,489	10,100	9,524	7,830	5,470	4,538	4,866	4,540	56,357
	HAL	538	1,505	1,443	550	265	145	23	13	4,482
	Percent HAL	5.4%	13.0%	13.2%	6.6%	4.6%	3.1%	.5%	.3%	7.4%
Data Missing	Other	1,433	961	930	329	149	143	123	123	4,191
	HAL	89	251	420	97	9	3	0	0	869
	Percent HAL	5.8%	20.7%	31.1%	22.8%	5.7%	2.1%	.0%	.0%	17.2%
Total	Other	30,866	28,810	24,698	19,944	15,197	14,214	13,334	11,796	158,859
	HAL	4,378	9,229	7,924	2,855	1,479	841	90	47	26,843
	Percent HAL	12.4%	24.3%	24.3%	12.5%	8.9%	5.6%	.7%	.4%	14.5%

E. CRA DATA

Additional data tables related to Community Reinvestment Act (CRA) data are presented in this section.

Table 2.E.1
Small Business Loans Originated: \$100,000 or Less by Tract MFI
 2. NOACA Region
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	2,019	2,657	13,697	12,460	610	31,443
2001	2,328	3,133	15,654	13,285	788	35,188
2002	2,550	3,671	19,204	16,010	836	42,271
2003	2,509	5,633	18,140	17,853	350	44,485
2004	2,485	5,336	18,376	17,598	321	44,116
2005	2,342	5,516	19,447	19,235	251	46,791
2006	3,298	7,535	27,050	29,334	467	67,684
2007	3,489	8,114	29,418	32,649	406	74,076
2008	2,621	5,938	21,866	25,345	315	56,085
2009	1,090	2,642	9,228	11,389	150	24,499
2010	984	2,370	8,379	10,275	146	22,154
2011	1,318	2,826	10,463	12,526	209	27,342
Total	27,033	55,371	210,922	217,959	4,849	516,134
Loan Amount (\$1,000s)						
2000	29,764	35,109	181,378	155,291	10,114	411,656
2001	28,929	32,485	187,414	160,793	10,228	419,849
2002	30,840	39,917	214,570	191,960	13,522	490,809
2003	26,510	59,340	194,031	195,003	5,062	479,946
2004	26,529	58,983	191,134	198,976	4,392	480,014
2005	28,768	66,360	225,005	231,826	4,551	556,510
2006	31,175	76,178	277,403	306,767	4,909	696,432
2007	35,993	87,569	298,711	349,028	4,416	775,717
2008	27,413	61,086	222,488	275,057	4,378	590,422
2009	13,841	38,128	117,891	138,297	2,598	310,755
2010	15,415	38,290	122,378	145,949	2,913	324,945
2011	22,036	46,548	155,944	185,606	3,377	413,511
Total	317,213	639,993	2,388,347	2,534,553	70,460	5,950,566

Table 2.E.2
Small Business Loans Originated: \$100,001 to \$250,000 by Tract MFI
 2. NOACA Region
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	115	111	570	500	39	1,335
2001	121	155	783	674	57	1,790
2002	130	190	756	764	77	1,917
2003	101	226	582	654	25	1,588
2004	135	230	619	653	25	1,662
2005	126	205	572	624	15	1,542
2006	86	224	581	624	17	1,532
2007	95	196	538	553	11	1,393
2008	78	153	473	528	13	1,245
2009	37	139	313	387	13	889
2010	84	162	474	535	16	1,271
2011	88	166	510	570	14	1,348
Total	1,196	2,157	6,771	7,066	322	17,512
Loan Amount (\$1,000s)						
2000	19,485	19,862	99,248	88,863	7,254	234,712
2001	21,284	27,968	139,130	120,690	10,747	319,819
2002	23,853	35,071	136,320	134,073	14,919	344,236
2003	17,684	40,282	104,380	118,013	4,396	284,755
2004	24,204	41,650	111,523	117,327	4,699	299,403
2005	23,314	37,638	103,475	111,644	2,644	278,715
2006	15,761	40,562	105,094	112,446	3,115	276,978
2007	16,942	35,490	96,514	98,279	2,014	249,239
2008	14,615	27,444	82,884	94,234	2,396	221,573
2009	6,703	24,958	54,525	66,919	2,493	155,598
2010	15,760	29,457	86,093	95,050	2,612	228,972
2011	16,749	29,470	90,177	101,938	2,402	240,736
Total	216,354	389,852	1,209,363	1,259,476	59,691	3,134,736

Table 2.E.3
Small Business Loans Originated: More than \$250,000 by Tract MFI
 2. NOACA Region
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	103	96	580	500	61	1,340
2001	122	136	741	640	60	1,699
2002	147	168	827	779	84	2,005
2003	90	249	705	706	29	1,779
2004	124	256	734	754	38	1,906
2005	136	232	660	751	26	1,805
2006	129	221	612	705	24	1,691
2007	91	213	593	654	13	1,564
2008	81	196	452	582	16	1,327
2009	75	151	412	481	12	1,131
2010	118	251	604	670	23	1,666
2011	89	212	554	621	19	1,495
Total	1,305	2,381	7,474	7,843	405	19,408
Loan Amount (\$1,000s)						
2000	53,722	49,342	302,326	254,275	31,722	691,387
2001	64,265	72,602	386,382	341,387	33,209	897,845
2002	78,140	92,523	445,613	414,725	46,998	1,077,999
2003	49,189	139,668	373,437	382,940	13,661	958,895
2004	61,590	146,198	392,004	408,961	20,656	1,029,409
2005	76,651	130,160	357,400	418,477	15,049	997,737
2006	71,128	128,637	333,511	395,606	14,692	943,574
2007	50,183	117,244	321,010	365,509	7,488	861,434
2008	43,791	109,521	238,153	325,279	9,194	725,938
2009	42,144	86,576	214,366	266,980	7,416	617,482
2010	67,125	145,389	333,750	366,950	12,348	925,562
2011	53,647	120,671	286,891	327,315	11,100	799,624
Total	711,575	1,338,531	3,984,843	4,268,404	223,533	10,526,886

Table 2.E.4
Small Business Loans to Businesses with Gross Annual Revenues of Less Than
\$1 Million by Tract MFI
 2. NOACA Region
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	791	1,030	5,633	5,011	233	12,698
2001	1,031	1,398	7,071	5,947	382	15,829
2002	720	985	5,235	4,867	301	12,108
2003	765	1,748	6,149	6,169	88	14,919
2004	765	1,721	6,116	6,142	89	14,833
2005	982	2,380	9,034	9,061	82	21,539
2006	1,093	2,663	10,453	10,466	104	24,779
2007	1,194	2,900	11,164	11,338	90	26,686
2008	727	1,759	7,033	7,228	61	16,808
2009	316	911	3,379	3,793	28	8,427
2010	325	898	3,191	3,508	33	7,955
2011	569	1,259	4,875	5,644	64	12,411
Total	9,278	19,652	79,333	79,174	1,555	188,992
Loan Amount (\$1,000s)						
2000	37,222	38,350	242,044	219,579	18,256	555,451
2001	37,705	54,140	281,206	281,780	15,795	670,626
2002	57,604	69,737	318,828	323,338	25,914	795,421
2003	28,045	84,574	269,150	277,992	6,487	666,248
2004	35,095	82,525	230,748	251,710	6,131	606,209
2005	37,341	78,001	253,993	280,940	3,631	653,906
2006	27,345	76,300	266,086	294,342	3,648	667,721
2007	30,902	67,395	253,961	273,227	2,962	628,447
2008	21,476	46,584	173,947	203,180	3,856	449,043
2009	6,846	32,189	108,481	125,862	761	274,139
2010	13,421	41,868	133,538	160,479	3,206	352,512
2011	19,713	41,690	144,252	175,894	2,000	383,549
Total	352,715	713,353	2,676,234	2,868,323	92,647	6,703,272

F. COMPLAINT DATA

This section contains data regarding fair housing complaints, as provided by the U.S. Department of Housing and Urban Development (HUD), the Ohio Civil Rights Commission (OCRC), the Fair Housing Contact Service (FHCS), and the Fair Housing Resource Center (FHRC).

HUD COMPLAINTS

Table 2.F.1
Fair Housing Complaints by Basis
2. NOACA Region
2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color	2	3	2	2	1	1			1	12
Disability	45	50	62	23	68	33	43	35	17	376
Family Status	10	13	24	19	26	90	47	66	35	330
National Origin	3	8	9	10	36	15	22	5	4	112
Race	45	43	51	45	82	54	44	18	15	397
Religion	2	6	3	3	11		2	2	4	33
Sex	5	5	16	13	11	19	25	9	8	111
Total Bases	112	128	167	115	235	212	183	135	84	1,371
Total Complaints	98	118	129	91	185	196	164	122	71	1,174

Table 2.F.2
Fair Housing Complaints by Issue
 2. NOACA Region
 2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Discrimination in terms, conditions or privileges relating to rental	16	39	37	21	28	38	41	21	7	248
Discriminatory refusal to rent	37	40	31	27	35	22	32	10	12	246
Failure to make reasonable accommodation	20	20	34	12	19	12	23	21	8	169
Discriminatory advertisement - rental		2	3		17	77	8	29	26	162
Discriminatory terms, conditions, privileges, or services and facilities	5	11	16	15	31	17	25	25	16	161
Discriminatory advertising, statements, and notices	6	5	6	4	23	12	45	29	10	140
Discriminatory acts under Section 818 (coercion, etc.)	13	18	11	7	4	8	11	11	7	90
Discriminatory refusal to rent and negotiate for rental	3	9	13	3	6	9	7	3	2	55
Other discriminatory acts	6	4	1	5	3	1	3	5	4	32
Otherwise deny or make housing available			1	1		5	10	9		26
False denial or representation of availability - rental	1	2	3		6	6	1	1		20
Discrimination in services and facilities relating to rental	1		1	5	3	3	4	3		20
Using ordinances to discriminate in zoning and land use	1	1	1		15	1				19
Discriminatory financing (includes real estate transactions)	2		6	5	2	1			1	17
Non-compliance with design and construction requirements (handicap)	2	2	3		3	3	1	1		15
Discriminatory refusal to negotiate for rental			2	1	4	5	2			14
Discrimination in terms, conditions, privileges relating to sale	2	1	2		2	1	3	1		12
Discrimination in making of loans		1		3	2	1	3	1		11
Discriminatory refusal to sell	1		2	2	1	1	3			10
Discrimination in the terms or conditions for making loans	1		1	1		2	3	2		10
Failure to permit reasonable modification	3	2	1		3		1			10
False denial or representation of availability			2		5	1				8
Discriminatory refusal to sell and negotiate for sale	1		2			1	1			5
Steering			1		1	2	1			5
Discriminatory advertising - sale					2	2				4
Refusing to provide insurance	2			2						4
Redlining - insurance	1				3					4
Discrimination in services and facilities relating to sale	1					1	1			3
Discriminatory refusal to negotiate for sale					1	1				2
Discrimination in the selling of residential real property					1		1			2
Discrimination in the appraising of residential real property						2				2
Redlining - mortgage			2							2
Restriction of choices relative to a rental			1			1				2
Failure to provide an accessible building entrance		1					1			2
Failure to provide accessible and usable public and common user areas	1		1							2
Failure to provide usable doors	1								1	2
Blockbusting - rental						1				1
Discrimination in the brokering of residential real property				1						1
Discriminatory brokerage service					1					1
Use of discriminatory indicators	1									1
Refusing to provide municipal services or property						1				1
Total Issues	128	158	184	115	221	238	231	172	94	1,541
Total Complaints	98	118	129	91	185	196	164	122	71	1,174

Table 2.F.3
Fair Housing Complaints by Closure Status
 2. NOACA Region
 2004–2012 HUD Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Administrative Closure	14	22	12	11	28	26	27	9	1	150
Cause (FHAP)	8	14	14	9	30	76	39	31	6	227
Charged (HUD)						1				1
Conciliated / Settled	42	41	59	23	61	53	65	30	14	388
DOJ Closure	1				7					8
No Cause	33	41	44	48	59	39	33	29		326
Open						1		23	50	74
Total Complaints	98	118	129	91	185	196	164	122	71	1,174

HUD Complaints Found With Cause

Table 2.F.4
Fair Housing Complaints Found With Cause by Basis
 2. NOACA Region
 2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color	1			1						2
Disability	29	30	38	13	43	18	28	16	4	219
Family Status	8	8	16	10	18	78	40	41	15	234
National Origin	1	1	5	1	16	8	10	4		46
Race	16	13	20	11	33	23	22	3	1	142
Religion	1	1	1		3			2		8
Sex	2	1	5	3	3	11	15	3	2	45
Total Bases	58	54	85	39	116	138	115	69	22	696
Total Complaints	51	55	73	32	98	130	104	61	20	624

Table 2.F.5
Fair Housing Complaints Found With Cause by Issue
 2. NOACA Region
 2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Discriminatory refusal to rent	20	21	17	10	21	17	20	7	2	135
Discriminatory advertisement - rental		1	3		14	70	7	15	12	122
Discrimination in terms, conditions or privileges relating to rental	8	14	17	9	17	18	24	11	2	120
Failure to make reasonable accommodation	14	13	22	8	14	11	16	10	2	110
Discriminatory advertising, statements, and notices	4	4	4	3	15	9	34	22	2	97
Discriminatory terms, conditions, privileges, or services and facilities	1	5	5	3	15	9	11	7	2	58
Discriminatory acts under Section 818 (coercion, etc.)	6	5	6	2	3	3	3	4		32
Discriminatory refusal to rent and negotiate for rental	2	3	7	1	4	4	6	1		28
False denial or representation of availability - rental		2	2		3	5	1			13
Otherwise deny or make housing available			1			2	5	3		11
Other discriminatory acts	2			2	2		2	1	1	10
Non-compliance with design and construction requirements (handicap)	2	2	1		3		1	1		10
Using ordinances to discriminate in zoning and land use	1		1		7					9
Discrimination in services and facilities relating to rental			1	2		2	3			8
False denial or representation of availability			2		4	1				7
Discrimination in making of loans		1		2	1		3			7
Failure to permit reasonable modification	3	2	1		1					7
Discriminatory refusal to negotiate for rental			1		2	3				6
Discriminatory financing (includes real estate transactions)	1		1			1				3
Discrimination in the terms or conditions for making loans				1		1	1			3
Discrimination in terms, conditions, privileges relating to sale	1		1				1			3
Discriminatory refusal to sell			1				1			2
Discriminatory refusal to sell and negotiate for sale			2							2
Discriminatory advertising - sale					1	1				2
Discrimination in services and facilities relating to sale	1						1			2
Steering						1	1			2
Restriction of choices relative to a rental			1			1				2
Blockbusting - rental						1				1
Discrimination in the appraising of residential real property						1				1
Refusing to provide insurance	1									1
Failure to provide an accessible building entrance		1								1
Failure to provide accessible and usable public and common user areas			1							1
Total Issues	67	74	98	43	127	161	141	82	23	816
Total Complaints	51	55	73	32	98	130	104	61	20	624

OHIO CIVIL RIGHTS COMMISSION COMPLAINTS

Table 2.F.6
Fair Housing Complaints by Basis
 2. NOACA Region
 2004–2012 OCRRC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color	3	5	1	1	2	2		1	1	16
Disability	48	51	103	31	49	29	40	33	7	391
Family Status	10	12	16	18	28	21	29	33	8	175
Gender	8	9	23	18	15	14	28	11	6	132
National Origin	5	8	5	10	32	3	16	3		82
Race	49	53	47	48	39	41	41	22	7	370
Religion	2	4	3	6	1		3	3		22
Retaliation	12	25	15	18	14	11	15	15	6	131
Other		1		2	1	1		1		6
Total Bases	137	168	213	152	206	120	172	122	35	1,325
Total Complaints	113	133	173	106	156	102	142	90	23	1,038

Table 2.F.7
Fair Housing Complaints by Issue
 2. NOACA Region
 2004–2012 OCRRC Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Advertising	8	2	2		4	11	19	19	7	72
Discharge				2						2
Exclusion	27	51	8	23	49	15	15			188
Harassment	13	24	5	16	13	17	6	2	3	99
Intimidation	5	10	4	3	4	2	2	1	4	35
Maternity				1						1
Other	44	43	69	43	50	35	71	33	2	390
Reasonable Accommodation	20	20	63	11	25	10	12	14	4	179
Recall			1							1
Sexual Harassment	1	4	1	4	4	2	1	1	3	21
Terms and Conditions	29	43	38	27	51	29	33	33	5	288
Testing				1						1
Total Issues	147	197	191	131	200	121	159	103	28	1,277
Total Complaints	113	133	173	106	156	102	142	90	23	1,038

Table 2.F.8
Fair Housing Complaints by Closure Status
 2. NOACA Region
 2004–2012 OCRRC Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Administrative Closure	4	1		7	1	2	6	2	4	27
CP Failed to Cooperate	1	3	3	6	2	8	11	4		38
CP Refused Full Relief			32							32
CP Withdrawal – No Benefit	17	19	6	6	10	5	20	7	1	91
Failure to Locate Charging Party	1		1		2					4
Inquiry Closed		1								1
No Cause Finding Issued	39	44	49	59	54	29	32	36	3	345
No Jurisdiction		3	4	2	2	3	3		1	18
Open Charge Closed By Legal Activity		4	5		1					10
Settlement With Benefits	15	15	37	13	39	39	38	24	8	228
Successful Conciliation	3	2	5	4	15	5	9	2		45
Withdrawal With Benefits	31	41	31	9	30	11	23	15	6	197
Missing	2									2
Total Complaints	113	133	173	106	156	102	142	90	23	1,038

FAIR HOUSING CONTACT SERVICE COMPLAINTS

Table 2.F.9
Fair Housing Complaints by Basis
 2. NOACA Region
 2004–2012 FHCS Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Ancestry	1									1
Color	1			1						2
Criminal Background							1			1
Disability	5		7	2	1	2		1		18
Familial Status							3	2		5
National Origin			2				1			3
Race	1		4	1			1			7
Retaliation	1									1
Sex			2	1			2	2		7
Other							1			1
Total Bases	9	0	15	5	1	2	9	5	0	46
Total Complaints	6		14	3	1	2	4	3		33

Table 2.F.10
Fair Housing Complaints by Closure Status
 2. NOACA Region
 2004–2012 FHCS Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Closed			3	2				1		6
Independently resolved						1				1
Inquiry			4		1					5
No contact							1			1
No probable cause			2	1			2			5
Pending			2					1		3
Probable cause										0
Referred for other assistance							1			1
Settled			3			1		1		5
Missing	6									6
Total Complaints	6	0	14	3	1	2	4	3	0	33

FAIR HOUSING RESOURCE CENTER COMPLAINTS

Table 2.F.11
Fair Housing Complaints by Basis
 2. NOACA Region
 2004– 2012 FHRC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability	44	24	24	13	4	14	26	12	16	177
Family Status	5	12	5	3	2	2		2	1	32
National Origin	4		4					1		9
Race	16	6	6	2	4	2	6	6	2	50
Sex	2		3			1				6
Other	2	4	11	17	11	6	10	14	13	88
Total Bases	73	46	53	35	21	25	42	35	32	362
Total Complaints	73	46	53	35	21	25	41	31	31	356

Table 2.F.12
Fair Housing Complaints by Issue Type
 2. NOACA Region
 2004– 2012 FHRC Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Rental	73	45	51	28	19	24	40	31	30	341
Sales		1								1
Advertising			2	7	2	1	1		1	14
Total	73	46	53	35	21	25	41	31	31	356

Table 2.F.13
Fair Housing Complaints by Closure Status
 2. NOACA Region
 2004– 2012 FHRC Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Investigated and referred to HUD/OCRC	2	1				1	2	1		7
Investigated and settled		1								1
Settled through counseling	64	40	45	32	19	19	35	26	25	305
Complaint filed in federal court								1		326
Reasonable Accommodation Granted	6	4	3	3		4	5	4	6	35
Referred to OCRC	1		5		1					7
Total	73	46	53	35	21	25	41	31	31	356

THE HOUSING RESEARCH AND ADVOCACY CENTER

Table 2.F.14
Fair Housing Complaints by Basis

2 NOACA Region
2004–2012 HRAC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability	2		9	14	18	22	55	42	52	214
Race	2	11	13	12	21	14	24	15	25	137
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	1	1	3	12	4	2	24
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
Sexual Harassment						1				1
Total Bases	6	13	36	41	53	55	118	86	152	560
Total Complaints	6	13	24	38	48	49	103	77	98	456

Table 2.F.15
Fair Housing Complaints by Issue

2 NOACA Region
2004–2012 HRAC Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Rental	6	10	21	30	44	48	93	75	85	412
Sale		3	2	7	2		1	2	2	19
Shelter							5			5
Other			1	1	1	1	4		9	17
Mortgage					1				2	3
Total	6	13	24	38	48	49	103	77	98	456
Total Complaints	6	13	24	38	48	49	103	77	98	456

Table 2.F.16
Fair Housing Complaints by Action Taken

2 NOACA Region
 2004–2012 HRAC Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Referred to OCRC	4	12	11	21	30	13	40	21	43	195
Fair Housing Info Given			8	7	9	22	24	30	56	156
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
Total	7	21	30	46	59	47	96	82	118	506
Total Complaints	6	13	24	38	48	49	103	77	98	456

G. FAIR HOUSING SURVEY FOR HOUSING STAKEHOLDERS DATA

This section presents public involvement data gathered through the 2012–2013 Fair Housing Survey for Housing Stakeholders.

Table 2.G.1
Primary Role of Respondent

2. NOACA Region
 2012–2013 Fair Housing Survey for Housing
 Stakeholders Data

Primary Role	Total
Advocate/Service Provider	29
Banking/Finance	2
Condo or Homeowner Association Leader	2
Construction/Development	5
Insurance	1
Law/Legal Services	.
Local Government	17
Property Management	2
Real Estate	6
Resident Advisory Council Leader	1
Other Role	16
Total	81

FEDERAL, STATE, AND LOCAL LAWS

Table 2.G.2
Familiarity with Fair Housing Laws

2. NOACA Region
2012–2013 Fair Housing Survey for Housing Stakeholders Data

Familiarity	Total
Not Familiar	3
Somewhat Familiar	26
Very Familiar	29
Missing	23
Total	81

Table 2.G.3
Perceptions About Fair Housing Laws

2. NOACA 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?	52	4	2	23	81
Are fair housing laws difficult to understand or follow?	14	31	11	25	81
Do you think fair housing laws should be changed?	13	24	19	25	81
Do you think fair housing laws are adequately enforced?	43	9	3	26	81

Table 2.G.4
Fair Housing Activities

2. NOACA 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?		43	9	3	26	81
Have you participated in fair housing training?		38	6	1	36	81
Are you aware of any fair housing testing?		24	21	10	26	81
Testing and education	Too Little	Right Amount	Too Much	Don't Know	Missing	Total
Is there sufficient outreach and education activity?	21	16	2	14	28	81
Is there sufficient testing?	12	6	3	34	26	81

Table 2.G.5**Protected Classes**

2. NOACA Region
2012–2013 Fair Housing Survey
for Housing Stakeholders Data

Protected Class	Total
Family Status	32
Religion	26
Gender	26
National Origin	24
Color	15
Sexual Orientation	15
Age	13
Military	13
Disability	5
Ancestry	7
Ethnicity	5
Race	3
Other	27
Total	212

Table 2.G.6**Fair Housing Violation Referrals**

2. NOACA Region
2012–2013 Fair Housing Survey for Housing
Stakeholders Data

Referral	Total
Cleveland Tenants Organization	6
Cleveland Fair Housing Board	4
City	3
Fair Housing Resource Center	14
Legal Aid	3
Other	3
Don't Know	2
Heights Community Congress	2
Housing Advocates, Inc.	2
Housing Research and Advocacy Center	2
Medina County Fair Housing	2
OCRC	11
HUD	10
ACLU	1
County	1
Total	66

LOCAL FAIR HOUSING**Table 2.G.7****Local Fair Housing**

2. NOACA 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?	28	17	5	31	81
Are there any specific geographic areas that have fair housing problems?	10	17	23	31	81
Are there any specific groups in that face housing discrimination?	12	15	21	33	81

FAIR HOUSING IN THE PRIVATE SECTOR

Table 2.G.8
Barriers to Fair Housing in the Private Sector
 2. NOACA Region
 2012–2013 Fair Housing Survey for Housing Stakeholders Data

Question	Yes	No	Don't Know	Missing	Total
Are you aware of any questionable practices or barriers to fair housing choice in:					
The rental housing market?	13	28	11	29	81
The real estate industry?	10	25	16	30	81
The mortgage and home lending industry?	13	22	18	28	81
The housing construction or accessible housing design fields?	9	23	21	28	81
The home insurance industry?	9	20	24	28	81
The home appraisal industry?	9	21	22	29	81
Any other housing services?	5	23	23	30	81

FAIR HOUSING IN THE PUBLIC SECTOR

Table 2.G.9
Barriers to Fair Housing in the Public Sector
 2. NOACA Region
 2012–2013 Fair Housing Survey for Housing Stakeholders Data

Question	Yes	No	Don't Know	Missing	Total
Are you aware of any questionable practices or barriers to fair housing choice in:					
Land use policies?	7	31	13	30	81
Zoning laws?	10	23	17	31	81
Occupancy standards or health and safety codes?	9	27	15	30	81
Property tax policies?	3	27	21	30	81
Permitting process?	4	25	21	31	81
Housing construction standards?	4	27	19	31	81
Neighborhood or community development policies?	7	27	17	30	81
Limited access to government services, such as employment services?	16	26	7	32	81
Public administrative actions or regulations?	6	23	22	30	81

NARRATIVE COMMENTS

Federal, State, and Local Laws

Table 2.G.10
How did you become aware of fair housing laws?

2. NOACA Region
 2013 Fair Housing Survey Data

Comments:
15 years of Community Development and working with Federal CDBG, HOME and other funds 25 years of working in the non-profit field of affordable housing As a landlord and community development professional Attended Fair Housing Commission meetings while working for a different county. Attending workshops Because of my professional work experience in areas of community development and public housing. Being educated as a fair housing board member By living in communities that stressed pro-integration policies. Conferences, Meetings, Studying them...etc... experience I am an approved Continuing Education provider and Instructor for the Division of Real Estate and regularly teach Fair Housing to real estate licensees. I am the Fair Housing Coordinator for the County I have worked in the Fair Housing non-profit field since 2000. I hold a real estate license in Ohio and it is a requirement of licensing. In order to acquire a real estate license we must take fair housing at both the state and local level as part of our real estate law course, and then re-take it every three years in order to maintain our license

Internet HUD NFCC
 It be the job for which I do.
 Research and seminars.
 The Housing Authority must be very cognizant of the fair housing laws as an owner and manager of various types of housing programs.
 The housing authority works closely with it's local fair housing agency to serve tenants in common
 The PHA does periodic trainings for staff, and I also regularly attend housing conferences and workshops.
 Through participating on various community related development efforts that dealt with housing regulations.
 Training sessions and workshops are attended by staff. We review HUD notifications.
 Training through the City of Lakewood
 Trainings and review of regulations
 We're a fair housing agency.
 Worked as a CSR for Banks- Loan officer and now in the City Fair Housing Board
 Working closely and sharing contracts with The Housing Research and Advocacy Center
 Working with city government

Table 2.G.11
How should fair housing laws be changed?

2. NOACA Region
 2013 Fair Housing Survey Data

Comments:
<p>Add ban the box...Discrimination based on Felony/arrest records. Additional protected classes, particularly Sexual Orientation should be added All People with Children don't need to be in ashelter for no longer than 2 days because this is to tramatic for all involved be it a fire abuse etc.. Too many empty homes that need to be occupied and adaquately repaired.First time done job that last a lifetime no work done shabby to get more money in the near futrue. On going program to assist elderly in any repairs of older sturtured property. Fair housing laws need to be more inclusive off vulnerable populations not just based on ethnicity and disability. seniors, renters, low income, populations, and students should all be protected classes in my opinion. Federal and/or Ohio Law should include sexual orientation. More funding needs to be provided for investigation & enforcement of the current laws. Sexual Orientation should be added. should add sexual preference or identiy They should be strengthened for enforcement purposes and to include additional protected classes. To afford greater protection to wider groups and harsher penalties for violators. to included formerly incarcerated persons as a portected class</p>

Local Fair Housing

Table 2.G.12
Are there any specific geographic areas that have fair housing problems?

2. NOACA Region
 2013 Fair Housing Survey Data

Comments:
<p>All areas in the County have Fair Housing issues. Personally seen them in Cleveland, North Olmsted, Lakewood, Westlake, Rocky River, Olmsted Falls, South Euclid, Cleveland Hts., Solon, Mayfield Hts., Strongsville, Middleburg Hts., Shaker Hts, Cuyahga Hts. (race, national origin, religion, family status, disability) All geographic areas. Housing discrimination occurs everywhere. Complaints cluster in higher density areas but nothing that would seem out of the norm in number of complaints in any one area Few people of color located anywhere in the county except for Painesville. Little Italy, various other enclaves in the city, specifically ethnic ones Suburbs have limited development through restictive zoning The City of Mentor defers all of their CDBG funds to Western Reserve Community Development. The net effect is the restriction of providing basic Life Safety funds to repair Mentor Seniors and Disabled homes. There is a perception of Fair housing issues in key growth areas of our city.</p>

Table 2.G.13
Are there any specific groups in that face housing discrimination?

2. NOACA Region
 2013 Fair Housing Survey Data

Comments:
<p>African Americans, Hispanics would seem to be most impacted All members of protected classes and individuals who have been incarcerated, pay their rent with sources of income other than employment, among others. Elderly/disabled; families with children in need of rentals.</p>

Formerly incarcerated persons often face discrimination when attempting secure housing
 Muslims/Arabs, Latinos (all), African Americans, families with children, people with disabilities
 Not so much discrimination as the ability to afford to live in the community. Affordable housing options are limited.
 Possibly-Those with felony records
 Racial and ethnic minorities
 Racial minorities in particular seem most prevalent
 The elderly and disabled.

Table 2.G.14
Please share any additional comments.

2. NOACA Region
 2013 Fair Housing Survey Data

Comments:
<p>All of the potential violations of the federal, state, and local fair housing laws occur in our area. Housing discrimination and segregated communities are a growing problem that effect not only where one lives but in many respects ones life chances through access to quality schools, transportation, employment, and a healthy environment. The health and sustainability of the community as a whole suffers without housing choice and integration. I would be happy to talk with you about any of these issues in more detail.</p> <p>given the fast number of persons returning to their community after a period of incarceration I would strongly advocate for making such persons a protected class to end housing discrimination against them.</p> <p>It is an important issue.</p> <p>Several of the questions such as, "...Do you think fair housing laws serve a useful purpose" are not easily answered "yes" or "no", and "don't know" isn't of much use to you for the survey.</p> <p>There needs to be more effort assisting Condo homeowners in the resolution of their complaints against Condo associations.</p>

Fair Housing in the Private Sector

Table 2.G.15

Are you aware of any questionable practices or barriers to fair housing choice in the rental housing market?

2. NOACA Region
2013 Fair Housing Survey Data

Comments:
<p>Family status & marital status - refusing to rent to a single mom with children; other attempts to refuse to allow children.</p> <p>I think it is arbitrary that rental properties under 3 units is exempt from Fair Housing practices</p> <p>Landlords who don't want to rent to families with children and try to advertise "no children" which is illegal.</p> <p>Making reasonable accommodations; families with children; therapy animals. Many non-traditional landlords (people who couldn't sell their homes) do not understand Fair Housing.</p> <p>Ongoing turnover in managers and new rental creates a lack of knowledge resulting in poor decisions</p> <p>Refusal to rent, differences in price/fees, denial of reasonable modifications & accommodations,</p> <p>Segregation resulting from housing discrimination against all protected classes Lack of accessible housing for people with disabilities Discrimination against families with children based on incorrect occupancy We would be happy to discuss these issues in more detail.</p> <p>Specific neighborhoods - less welcoming to minorities, like Little Italy...Gentrifying neighborhoods like Tremont with little affordable housing</p> <p>There are landlords who prefer not to rent to people with what they consider to be too many children. I have also heard of families who have trouble renting housing in certain areas because of reluctance to accept Housing Choice Vouchers. This can make it difficult for families to have adequate housing options.</p> <p>Zoning requirements for minimum square footage conflict with HUD requirements</p>

Table 2.G.16

Are you aware of any questionable practices or barriers to fair housing choice in the real estate industry?

2. NOACA Region
2013 Fair Housing Survey Data

Comments:
<p>I know someone who sued their realtor because they were not being permitted to view all available housing within a community. The realtor was showing African American families homes in specific sections of the city.</p> <p>Mental disabilities were the basis of eviction of a Senior from her home.</p> <p>see above</p> <p>Steering Blockbusting Lack of knowledge about fair housing laws Lack of supervision and training of real estate agents by brokerage firms</p> <p>Steering, differences in level of service</p> <p>tend to be biased against Cleveland neighborhoods</p> <p>The amount of segregation must point to some racial steering.</p> <p>The industry is pretty well trained and the consequences for violation are well known.</p>

Table 2.G.17

Are you aware of any questionable practices or barriers to fair housing choice in the mortgage and home lending industry?

2. NOACA Region
2013 Fair Housing Survey Data

Comments:
<p>A lot of the foreclosures on homes in the area were filed against minorities, many women who were victims of lending scams</p> <p>A neighbor of mine was turned down for a refinance mortgage when her lender refused to consider her disability income.</p> <p>Differences in level of service, rates, loan products, application requirements</p> <p>Disproportionate loan denials</p> <p>HUD regulation prohibit home improvement grants & loans to persons living in mobile homes in mobile home parks.</p> <p>It is my belief that people of different races are treated substantially differently by the lending community. Minorities are denied access to credit or charged higher interest rates.</p> <p>Loan products that were developed such as the interest only product and the ARM loan product created a scenario that adversely impacted racial minorities more than other ethnic groups. These loan products were used more consistently in urban areas to finance homes and rental properties.</p> <p>Mortgages are offered in only certain areas and Private mortgage insurance is disproportionately apply to minorities</p> <p>People of color are denied and receive high-cost loans more often.</p> <p>Redlining Different terms and conditions Inaccessible information about lending practices</p> <p>Women and racial minorities have higher interest rate and are denied loan modifications at a higher rate than Whites.</p>

Table 2.G.18**Are you aware of any questionable practices or barriers to fair housing choice in the housing construction or accessible housing design fields?**2. NOACA Region
2013 Fair Housing Survey Data

Comments:
affordable housing not being built by developers Inaccessible housing Lack of knowledge or ignoring building code and fair housing law requirements Differences in treatment based on location/neighborhood of property. More Universal Design is needed. Recently, K&D got in a major suit over building inaccessible housing and bribing building officials When buildings are accessible it is often side,hard to get to entrance.

Table 2.G.19**Are you aware of any questionable practices or barriers to fair housing choice in the home insurance industry?**2. NOACA Region
2013 Fair Housing Survey Data

Comments:
In the insurance industry many companies fail to ensure homes in communities with an older housing stock and they refuse in some respects to insure rental property due to age of the housing and the type of features that exist in the homes. Most of the homes in urbanized areas are occupied by minorities and renters which are protected classes. by virtue of looking at housing age and rental factors you are by default making it difficult to obtain or maintain insurance for certain groups. Even if the basis for insurance companies decision are not racially motivated. the factors in which insurance companies make decisions on who to ensure and at what rate will impact certain groups more than others. Insurance companies drop Seniors' homeowner's insurance policies prior to the completion of HUD assistance application & construction process. Limiting policies and coverages to racial minorities often difficult to get insurance coverage in low income areas Redlining Different terms and conditions Inaccessible information about practices Differences in treatment based on location/neighborhood of property.

Table 2.G.20**Are you aware of any questionable practices or barriers to fair housing choice in the home appraisal industry?**2. NOACA Region
2013 Fair Housing Survey Data

Comments:
Appraisers often use language in describing neighborhoods and properties that violate Fair Housing requirements. Basing home values on the racial & ethnic composition of neighborhoods. Have not seen anything as blatant as example cited above I think the appraisal industry is fully out of whack and contributing to the slow housing market. They have over-corrected and hampering sales and legitimate increase in values which hurts everyone In the past Black neighborhoods had houses appraised to high and now with the decline they have declined in value at a greater percentage than similar 'white' neighborhoods its a known fact that lower income minority communities housing stock appraises lower than non-minority communities. The reason for this one can assume is not primarily condition of the housing stock. when racial composition changes in neighborhoods so does the housing values in those communities. many homes in minority areas were valued below there actual value Redlining Different terms and conditions Inaccessible information about practices Differences in treatment based on location/neighborhood of property. The changing real estate market has affected rental comparables and property values.

Table 2.G.21**Are you aware of any questionable practices or barriers to fair housing choice in any other housing services?**

2. NOACA Region
2013 Fair Housing Survey Data

Comments:
<p>Differences in treatment of individuals and maintenance of property based on location/neighborhood of property.</p> <p>In Cleveland, a family member who is White has found it difficult to foreclosure prevention assistance. One person she talked to told her their service was only for Black people.</p> <p>In Ward 1 in Garfield minority interest seeking to purchase a home in the Garfield community are steered to the Ward 1 area of the City. Many of those minorities who desire to live in that community because of the school system end up in Ward 1 because that area of Garfield falls under the CMSD jurisdiction. By steering minorities to this area those families with school aged children don't get the benefit of going to Garfield schools, rather they must attend John Adams which is a CMSD institution.</p> <p>Lack of low and moderate rental units</p>

Fair Housing in the Public Sector**Table 2.G.22****Are you aware of any questionable practices or barriers to fair housing choice in land use policies?**

2. NOACA Region
2013 Fair Housing Survey Data

Comments:
<p>Concentration of multi-family housing in segregated areas.</p> <p>It is more economic but large lot zoning excludes many from living here, although not specifically for Fair Housing</p> <p>Land use for multi-family units is limited to 3 major cities</p> <p>Localities have been increasing densities allowed in areas as sewers are extended.</p> <p>more and more we are seeing the desire to create compact mixed use communities that offer convenience by promoting walkability and creates sustainable developments. However many of the developments that are created concentrate people of similar incomes and social status. We are moving toward a mixed income scenario with some developments however it is not as much as we need</p> <p>Policies that concentrate multi-family housing in limited areas</p> <p>There are townships that do not provide for multi-family housing at all.</p>

Table 2.G.23**Are you aware of any questionable practices or barriers to fair housing choice in zoning laws?**

2. NOACA Region
2013 Fair Housing Survey Data

Comments:
<p>Actually Geauga County Commissioners are quite open and active in placing homes for the developmentally disabled</p> <p>Group homes and other such uses are restricted and need to be heard before the Board of Zoning Appeals</p> <p>Laws that restrict placement of group homes</p> <p>Often group homes are a "conditional use".</p> <p>Prohibition of group homes. Restrictive definitions of families.</p> <p>Zoning laws restrict minimum square footage to large single family homes</p>

Table 2.G.24**Are you aware of any questionable practices or barriers to fair housing choice in occupancy standards or health and safety codes?**

2. NOACA Region
2013 Fair Housing Survey Data

Comments:
<p>Certain suburbs are more active in monitoring and forcing the correction of health and safety codes than others. There is often more attention paid to higher income subsections of the community.</p> <p>Inadequate code enforcement in communities of color and immigrant communities.</p> <p>No ability to enforce health codes in rental properties</p> <p>Restrictions on definition of family, overly restrictive occupancy</p> <p>Russell Township recently adopted an extremely limited definition of family in an effort to keep out "house-mates".</p> <p>There are health and safety code violations that are not adequately enforced in low income minority communities due to the impact of the housing crisis (foreclosed/substandard housing) in many of these areas. The volume of housing issues outweighs our ability to police.</p> <p>Unsure, but there may be concerns more around migrant workers.</p>

Table 2.G.25**Are you aware of any questionable practices or barriers to fair housing choice in property tax policies?**

2. NOACA Region
2013 Fair Housing Survey Data

Comments:

County provides funding on an as needed basis for accessibility through CDBG funds and is becoming better equipped in identifying partners that can assist in funding these needs as well.
Disinvestment and foreclosures resulting from lending discrimination result in diminished property values in minority neighborhoods. No Lake County community is currently providing tax incentives to plan or construct the amount of required Universal Design housing that will be required for the vast increase that baby boomers will need within ten years.

Table 2.G.26**Are you aware of any questionable practices or barriers to fair housing choice in the permitting process?**

2. NOACA Region
2013 Fair Housing Survey Data

Comments:

I am not aware of a community that has translated forms into Spanish within the County.
Permits denied based on protected class or segregated neighborhood. Permit requirements not followed in segregated neighborhoods.
we do not currently offer permitting process information in alternative languages via the internet or otherwise.

Table 2.G.27**Are you aware of any questionable practices or barriers to fair housing choice in housing construction standards?**

2. NOACA Region
2013 Fair Housing Survey Data

Comments:

Although accessibility requirements are in the Ohio Building Codes, the local building inspectors have no training on those standards, and approve plans that are not accessible
Lack of enforcement. Building officials don't have to certify that residences are accessible prior to construction or occupancy permitting.
Lake County Building Department has a track record of being counterproductive in their interaction with the building and design communities. Assistance in understanding guidelines are blocked because of this department's adversarial leadership
Most Building Departments and architects are able to refer to online standards

Table 2.G.28**Are you aware of any barriers that limit access to government services, such as a lack of transportation or employment services?**

2. NOACA Region
2013 Fair Housing Survey Data

Comments:

Community development efforts are too strongly focused on the areas of greatest need. More effort should be made to strengthen areas with some market confidence so that they can remain solid and grow.
Gentrifying neighborhoods focused on eliminating affordable housing, thus a disparate impact on people of color
investments in "trendy" neighborhoods result in displacement of current residents
policies that encourage development in narrowly defined areas of the community
Policies that encourage economic development without considering the impact on existing residential communities when developments occur in racially or ethnically segregated communities.

Table 2.G.29**Are you aware of any questionable practices or barriers to fair housing choice in any other public administrative actions or regulations?**2. NOACA Region
2013 Fair Housing Survey Data

Comments:
<p>for many with low-incomes transportation to various government services can present a problem if the service is located out of their area.</p> <p>lack of affordable public transportation</p> <p>Lack of transportation as well as the probability of reduced transportation due to budget cuts in public transportation</p> <p>lack of transportation or employment services</p> <p>Limited public transportation.</p> <p>No transportation levy in county so funds for transportation are quite limited</p> <p>Public education of the availability of HUD assistance programs is not being funded or done.</p> <p>Public transit is limit, difficult, and hard to navigate..The ticketing machines are next to impossible. Very hard to use. Disparate impact on the poor and people of color.</p> <p>Public transportation has been shrinking due to budgetary constraints</p> <p>RTA eliminated the circulator and reduced routes in community</p> <p>There is very limited public transportation (by appointment only). Many officials are parttime and not available to residents at times residents can see them.</p> <p>Transportation</p> <p>Transportation system is biased to the automobile.</p> <p>Transportation, especially for people with disabilities.</p>

H. LAND USE PLANNING SURVEY DATA

This section contains data regarding the potential effects of local land use and housing policies on fair housing choice, as gathered from the Fair Housing Survey for Government Officials.

FAIR HOUSING SURVEY FOR GOVERNMENT OFFICIALS

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 was conducted predominately online. Respondents were solicited by mass-distributed emails sent by the NEOSCC, members of the Progress Review Team, and other various organizations in the 12-county region.

This section contains data gathered from the public sector staff in the NOACA Region that received and completed the survey.⁸

⁸ For areas with both nonentitlement and entitlement communities, the results of the nonentitlement community government official survey and the entitlement community interviews were summed.

Table 2.H.1
Housing Development
 2. NOACA Region
 2012 Fair Housing Survey for Government Officials Data

Question: Does your jurisdiction have...	Yes	No	Don't Know	Missing	Total
Housing Development					
Definitions for "dwelling unit" or "residential unit"?	25	4	5	28	62
Guidelines that encourage development affordable housing units?	9	18	7	28	62
Any potential barriers to the development of low- to moderate- income housing?	4	18	11	29	62
Guidelines that allow the development of mixed use housing?	17	10	7	28	62
Any potential barriers to the development of mixed use housing?	12	11	11	28	62
Occupancy Standards					
A definition for the term "family"?	19	7	8	28	62
Residential occupancy standards or limits?	11	9	13	29	62
Special Needs Housing					
A definition for the term "disability"?	7	16	7	32	62
Development standards for making housing accessible to persons with disabilities?	7	13	9	33	62
A process by which persons with disabilities can request modification to the jurisdiction's policies?	8	12	10	32	62
Standards for the development of senior housing?	6	15	8	33	62
Guidelines that distinguish senior citizen housing from other residential uses?	13	8	8	33	62
Guidelines for developing housing for any other special needs populations?	12	11	7	32	62
Fair Housing Policies					
A fair housing ordinance, policy, or regulation?	16	4	9	33	62
Policies or practices for "affirmatively furthering fair housing"?	14	8	7	33	62

I. IMPEDIMENTS

The 2013 Northeast Ohio Regional Analysis of Impediments to Fair Housing Choice uncovered several potential issues regarding fair housing in the NOACA Region. Identification of these items as probable impediments to fair housing choice was based on HUD's definition of impediments as actions, omissions, or decisions that restrict housing choice due to protected class status or actions, omissions, or decisions that have this effect. The identified impediments are supported by evidence uncovered during the Regional AI process, with impediments of higher need being those identified in multiple sources.

These probable impediments in the entirety of the Northeast Ohio Region are presented in **Volumes I** and **II** of the Regional AI. They are accompanied by suggested actions that jurisdictions in the Region may implement in order to alleviate or eliminate these impediments, and are accompanied by measurable objectives. The goal of these actions and measurable objectives is to assist these agencies in offering greater housing choice for all citizens of the Northeast Ohio Region.

The following list presents the private and public sector impediments found in the NOACA Region.

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.

IMPEDIMENTS MATRIX

The matrix on the following page includes the impediment, data source, or sources that indicated its existence, protected classes most affected, and ranking of need for action. Level of need for action was determined based on the number of data sources that identified each impediment.

Table 2.I.1
Impediments Matrix
 2. NOACA 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 ⁹		
Private Sector												
1	Denial of available housing units in the rental markets		X				X	X			Black and Hispanic persons	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			All	L
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	Disabled persons, families	L
6	Lack of inclusionary policies							X		X	All	M

⁹ 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.

3. NEFCO REGION

A. CENSUS BUREAU DATA

This section contains additional data from the U.S. Census Bureau.

Table 3.A.1

Population by Age

3. NEFCO Region

2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Under 5	77,288	6.5%	69,335	5.8%	-10.3%
5 to 19	253,861	21.4%	240,606	20.2%	-5.2%
20 to 24	73,956	6.2%	80,829	6.8%	9.3%
25 to 34	151,706	12.8%	136,450	11.4%	-10.1%
35 to 54	357,088	30.1%	332,019	27.8%	-7.0%
55 to 64	106,782	9.0%	156,615	13.1%	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%	.7%

Table 3.A.2

Elderly Population by Age

3. NEFCO Region

2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
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%

Table 3.A.3

Population by Race and Ethnicity

3. NEFCO Region

2000 & 2010 Census SF1 Data

Race	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
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	.2%	2,455	.2%	-.4%
Asian	11,686	1.0%	17,828	1.5%	52.6%
Native Hawaiian/ Pacific Islander	192	.0%	284	.0%	47.9%
Other	3,280	.3%	5,302	.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%	.7%
Non-Hispanic	1,174,419	99.1	1,174,808	98.4%	.0%
Hispanic	10,203	.9%	18,498	1.6%	81.3%

Table 3.A.4
Disability by Age
 3. NEFCO Region
 2010 Three-Year ACS Data

Age	Male		Female		Total	
	Disabled Population	Disability Rate	Disabled Population	Disability Rate	Disabled Population	Disability Rate
Under 5	35	.1%	141	.4%	176	.3%
5 to 17	8,394	8.1%	4,051	4.0%	12,445	6.1%
18 to 34	7,689	6.2%	6,728	5.3%	14,417	5.7%
35 to 64	28,733	12.1%	31,308	12.5%	60,041	12.3%
65 to 74	10,397	25.6%	11,636	24.3%	22,033	24.9%
75 or Older	15,359	49.3%	24,054	49.8%	39,413	49.6%
Total	70,607	12.3%	77,918	12.8%	148,525	12.6%

Table 3.A.5
Employment Status by Disability and Type: Age 18 to 64
 3. NEFCO Region
 2010 Three-Year ACS Data

Disability Status	Population
Employed:	535,445
With a disability:	26,252
With a hearing difficulty	7,715
With a vision difficulty	4,008
With a cognitive difficulty	8,057
With an ambulatory difficulty	10,067
With a self-care difficulty	2,913
With an independent living difficulty	5,574
No disability	509,193
Unemployed:	56,654
With a disability:	6,961
With a hearing difficulty	1,163
With a vision difficulty	1,126
With a cognitive difficulty	3,512
With an ambulatory difficulty	2,246
With a self-care difficulty	781
With an independent living difficulty	1,760
No disability	49,693
Not in labor force:	146,916
With a disability:	41,245
With a hearing difficulty	5,463
With a vision difficulty	5,652
With a cognitive difficulty	19,763
With an ambulatory difficulty	25,409
With a self-care difficulty	9,688
With an independent living difficulty	19,412
No disability	105,671
Total	739,015

Table 3.A.6
Households by Income

3. NEFCO 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	67,833	14.6%	65,185	13.6%
\$15,000 to \$19,999	29,097	6.3%	27,494	5.7%
\$20,000 to \$24,999	31,798	6.9%	27,994	5.9%
\$25,000 to \$34,999	63,656	13.7%	55,847	11.7%
\$35,000 to \$49,999	82,012	17.7%	75,080	15.7%
\$50,000 to \$74,999	96,483	20.8%	92,547	19.4%
\$75,000 to \$99,999	46,247	10.0%	58,613	12.3%
\$100,000 or More	45,963	9.9%	75,497	15.8%
Total	463,089	100.0%	478,257	100.0%

Table 3.A.7
Poverty by Age

3. NEFCO Region
2000 Census SF3 & 2010 Five-Year ACS Data

Age	2000 Census		2010 Five-Year ACS	
	Persons in Poverty	% of Total	Persons in Poverty	% of Total
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%
Total	108,949	100.0%	151,943	100.0%
Poverty Rate	9.4%	.	13.0%	.

Table 3.A.8
Households by Year Home Built

3. NEFCO Region
2000 Census SF3 & 2010 Five-Year ACS Data

Year Built	2000 Census		2010 Five-Year ACS	
	Households	% of Total	Households	% of Total
1939 or Earlier	100,738	21.8%	94,989	19.9%
1940 to 1949	43,452	9.4%	36,054	7.5%
1950 to 1959	76,862	16.6%	75,724	15.8%
1960 to 1969	68,551	14.8%	61,790	12.9%
1970 to 1979	73,760	15.9%	71,436	14.9%
1980 to 1989	40,827	8.8%	40,501	8.5%
1990 to 1999	58,808	12.7%	56,502	11.8%
2000 to 2004	.	.	29,753	6.2%
2005 or Later	.	.	11,508	2.4%
Total	462,998	100.0%	478,257	100.0%

Table 3.A.9
Housing Units by Type

3. NEFCO Region
2000 Census SF3 & 2010 Five-Year ACS Data

Unit Type	2000 Census		2010 Five-Year ACS	
	Units	% of Total	Units	% of Total
Single-Family	366,221	74.7%	399,761	76.6%
Duplex	29,770	6.1%	25,756	4.9%
Tri- or Four-Plex	18,747	3.8%	18,172	3.5%
Apartment	59,680	12.2%	63,671	12.2%
Mobile Home	15,823	3.2%	14,260	2.7%
Boat, RV, Van, Etc.	83	.0%	74	.0%
Total	490,324	100.0%	521,694	100.0%

Table 3.A.10
Housing Units by Tenure

3. NEFCO Region
2000 & 2010 Census SF1 Data

Tenure	2000 Census		2010 Census		% Change 00–10
	Units	% of Total	Units	% of Total	
Occupied Housing Units	462,998	94.4%	478,730	91.4%	3.4%
Owner-Occupied	330,241	71.3%	332,098	69.4%	.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%
Total Housing Units	490,324	100.0%	523,643	100.0%	6.8%

Table 3.A.11
Disposition of Vacant Housing Units

3. NEFCO Region
2000 & 2010 Census SF1 Data

Disposition	2000 Census		2010 Census		% Change 00–10
	Units	% of Total	Units	% of Total	
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%	-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%

Table 3.A.12
Households by Household Size

3. NEFCO Region
2000 & 2010 Census SF1 Data

Size	2000 Census		2010 Census		% Change 00–10
	Households	% of Total	Households	% of Total	
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%	-.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%

Table 3.A.13
Household Type by Tenure
 3. NEFCO Region
 2000 & 2010 Census SF1 Data

Household Type	2000 Census		2010 Census		% Change 00–10
	Households	% of Total	Households	% of Total	
Family Households	316,029	68.3%	312,354	65.2%	-1.2%
Married-Couple Family	245,513	77.7%	230,617	73.8%	-6.1%
Owner-Occupied	213,776	87.1%	201,441	87.3%	-5.8%
Renter-Occupied	31,737	12.9%	29,176	12.7%	-8.1%
Other Family	70,516	22.3%	81,737	26.2%	15.9%
Male Householder, No Spouse	16,748	23.8%	21,587	26.4%	28.9%
Owner-Occupied	10,522	62.8%	12,794	59.3%	21.6%
Renter-Occupied	6,226	37.2%	8,793	40.7%	41.2%
Female Householder, No Spouse	53,768	76.2%	60,150	73.6%	11.9%
Owner-Occupied	27,971	52.0%	28,887	48.0%	3.3%
Renter-Occupied	25,797	48.0%	31,263	52.0%	21.2%
Non-Family Households	146,969	31.7%	166,376	34.8%	13.2%
Owner-Occupied	77,972	53.1%	88,976	53.5%	14.1%
Renter-Occupied	68,997	46.9%	77,400	46.5%	12.2%
Total	462,998	100.0%	478,730	100.0%	3.4%

Table 3.A.14
Group Quarters Population
 3. NEFCO Region
 2000 & 2010 Census SF1 Data

Group Quarters Type	2000 Census		2010 Census		% Change 00-10
	Population	% of Total	Population	% of Total	
Institutionalized					
Correctional Institutions	1,887	14.3%	1,904	16.9%	.9%
Juvenile Facilities	.	.	526	4.7%	.
Nursing Homes	10,004	75.7%	8,561	75.9%	-14.4%
Other Institutions	1,318	10.0%	288	2.6%	-78.1%
Total	13,209	100.0%	11,279	100.0%	-14.6%
Noninstitutionalized					
College Dormitories	11,936	76.1%	14,661	76.8%	22.8%
Military Quarters	0	.0%	0	.0%	%
Other Noninstitutional	3,745	23.9%	4,436	23.2%	18.5%
Total	15,681	54.3%	19,097	62.9%	21.8%
Total Group Quarters Population	28,890	100.0%	30,376	100.0%	5.1%

Table 3.A.15
Overcrowding and Severe Overcrowding
 3. NEFCO Region
 2000 Census SF3 & 2010 Five-Year ACS Data

Data Source	No Overcrowding		Overcrowding		Severe Overcrowding		Total
	Households	% of Total	Households	% of Total	Households	% of Total	
Owner							
2000 Census	327,613	99.2%	2,182	.7%	476	.1%	330,271
2010 ACS	334,905	99.4%	1,798	.5%	299	.1%	337,002
Renter							
2000 Census	129,216	97.4%	2,408	1.8%	1,103	.8%	132,727
2010 ACS	138,672	98.2%	2,075	1.5%	508	.4%	141,255
Total							
2000 Census	456,829	98.7%	4,590	1.0%	1,579	.3%	462,998
2010 ACS	473,577	99.0%	3,873	.8%	807	.2%	478,257

Table 3.A.16
Households with Incomplete Plumbing Facilities
 3. NEFCO Region
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Plumbing Facilities	461,283	476,558
Lacking Complete Plumbing Facilities	1,715	1,699
Total Households	462,998	478,257
Percent Lacking	.4%	.4%

Table 3.A.17
Households with Incomplete Kitchen Facilities
 3. NEFCO Region
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Kitchen Facilities	460,599	474,686
Lacking Complete Kitchen Facilities	2,399	3,571
Total Households	462,998	478,257
Percent Lacking	.5%	.7%

Table 3.A.18
Cost Burden and Severe Cost Burden by Tenure
 3. NEFCO Region
 2000 Census & 2010 Five-Year ACS Data

2000 Census & 2010 Five-Year ACS Data									
Data Source	Less Than 30%		31%-50%		Above 50%		Not Computed		Total
	Households	% of Total	Households	% of Total	Households	% of Total	Households	% of Total	
Owner With a Mortgage									
2000 Census	155,365	76.8%	31,875	15.8%	14,438	7.1%	613	.3%	202,291
2010 ACS	158,152	68.5%	47,675	20.7%	24,273	10.5%	662	.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 ACS	89,603	84.3%	9,979	9.4%	5,777	5.4%	881	.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 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 ACS	314,787	65.8%	88,738	18.6%	63,295	13.2%	11,437	2.4%	478,257

Table 3.A.19
Median Housing Costs
 3. NEFCO Region
 2000 Census SF3 & 2010 Five-Year ACS Data

Housing Cost	2000 Census	2010 ACS
Median Contract Rent	\$1,726	\$2,172
Median Home Value	\$440,500	\$563,100

B. BEA DATA

This section contains additional Bureau of Economic Analysis (BEA) data that address employment and income.

Table 3.B.1
Employment by Industry
 3. NEFCO Region
 Select Years 2001–2010 BEA Data

NAICS Categories	2001	2005	2006	2007	2008	2009	2010	% Change 01–10
Farm employment	5,919	5,144	5,148	5,218	4,808	4,878	4,828	-18.4%
Forestry, fishing, related activities, and other	178	625	549	579	862	575	825	363.5%
Mining	1,178	2,314	2,048	2,242	4,164	2,551	4,275	262.9%
Utilities	2,726	1,875	1,909	1,899	1,860	1,835	1,765	-35.3%
Construction	36,710	39,278	39,000	38,200	36,243	32,954	31,245	-14.9%
Manufacturing	110,765	95,435	93,743	92,126	88,344	76,424	75,037	-32.3%
Wholesale trade	29,420	28,749	28,654	29,042	28,582	27,118	27,020	-8.2%
Retail trade	79,836	79,446	78,429	78,315	77,147	72,206	71,585	-10.3%
Transportation and warehousing	14,472	17,457	16,202	18,437	15,856	14,656	16,106	11.3%
Information	8,895	8,403	8,649	8,727	8,541	8,086	7,746	-12.9%
Finance and insurance	23,845	25,900	25,558	26,121	27,285	28,750	29,433	23.4%
Real estate and rental and leasing	19,905	23,824	23,457	23,041	22,589	22,192	21,961	10.3%
Professional and technical services	30,367	31,956	32,621	34,478	34,995	33,373	33,354	9.8%
Management of companies and enterprises	10,958	15,488	15,660	15,594	17,187	16,966	16,449	50.1%
Administrative and waste services	37,755	40,604	42,408	43,346	42,621	38,127	39,196	3.8%
Educational services	11,157	11,717	11,816	11,736	11,985	12,169	12,593	12.9%
Health care and social assistance	69,883	72,375	73,967	76,354	78,518	79,483	80,063	14.6%
Arts, entertainment, and recreation	11,514	12,108	12,191	12,338	12,304	12,047	12,025	4.4%
Accommodation and food services	43,397	46,592	46,313	46,628	46,167	44,497	44,768	3.2%
Other services, except public administration	37,177	38,250	37,705	37,881	37,588	36,605	36,053	-3.0%
Government and government enterprises	78,957	79,820	79,170	80,272	81,364	80,714	80,188	1.6%
Total	671,266	686,376	686,615	692,519	689,590	658,650	655,350	-2.4%

Table 3.B.2
Real Earnings by Industry

3. NEFCO Region
 Select Years 2001–2010 BEA Data, Real 2011 Dollars

NAICS Categories	2001	2005	2006	2007	2008	2009	2010	% Change 00–10
Farm earnings	96,326	74,731	51,235	67,878	66,176	64,703	58,996	-38.8%
Forestry, fishing, related activities, and other	11,330	14,557	12,272	12,717	15,921	10,296	12,922	14.0%
Mining	41,667	165,442	142,948	130,733	383,790	73,028	128,224	207.7%
Utilities	250,296	230,497	223,672	206,796	227,112	224,293	207,646	-17.0%
Construction	2,083,529	1,924,946	1,948,089	1,790,579	1,658,592	1,462,743	1,435,578	-31.1%
Manufacturing	6,909,460	6,430,730	6,335,128	6,110,086	6,041,094	5,161,355	5,540,985	-19.8%
Wholesale trade	1,820,943	1,943,366	1,965,872	2,015,665	2,001,237	1,793,825	1,817,594	-.2%
Retail trade	2,403,118	2,442,274	2,365,665	2,302,496	2,205,882	2,018,095	2,058,508	-14.3%
Transportation and warehousing	763,298	891,338	792,706	882,530	795,923	684,777	772,204	1.2%
Information	467,888	471,016	480,781	471,260	438,316	422,644	395,275	-15.5%
Finance and insurance	1,357,757	1,416,484	1,427,522	1,373,399	1,233,436	1,249,853	1,251,844	-7.8%
Real estate and rental and leasing	404,463	397,964	359,620	293,810	350,710	380,860	367,124	-9.2%
Professional and technical services	1,418,131	1,576,425	1,630,751	1,685,946	1,812,730	1,710,743	1,776,714	25.3%
Management of companies and enterprises	995,539	1,457,323	1,497,534	1,653,882	1,738,233	1,666,245	1,749,191	75.7%
Administrative and waste services	959,084	1,074,744	1,121,778	1,198,430	1,239,647	1,168,893	1,178,514	22.9%
Educational services	255,835	270,429	281,496	284,011	299,442	307,187	315,035	23.1%
Health care and social assistance	3,364,527	3,590,099	3,653,250	3,701,305	3,914,949	3,964,841	3,972,755	18.1%
Arts, entertainment, and recreation	225,166	192,019	196,018	184,544	159,778	154,580	151,591	-32.7%
Accommodation and food services	744,638	784,749	764,286	802,356	775,832	754,599	797,785	7.1%
Other services, except public administration	1,123,732	1,191,293	1,159,749	1,155,957	1,102,688	1,059,367	1,079,211	-4.0%
Government and government enterprises	4,016,912	4,356,300	4,223,138	4,208,975	4,291,704	4,400,793	4,411,553	9.8%
Total	29,981,587	31,275,688	31,142,274	30,940,265	31,160,635	29,184,676	29,805,607	-.6%

Table 3.B.3
Real Earnings Per Job by Industry
 3. NEFCO Region

Select Years 2001–2010 BEA Data, 1,000's of Real 2011 Dollars

NAICS Categories	2001	2005	2006	2007	2008	2009	2010	% Change 00–10
Farm earnings	16,274	14,528	9,952	13,008	13,764	13,264	12,220	-24.9%
Forestry, fishing, related activities, and other	63,653	23,291	22,353	21,964	18,470	17,906	15,663	-75.4%
Mining	35,371	71,496	69,799	58,311	92,168	28,627	29,994	-15.2%
Utilities	91,818	122,932	117,167	108,897	122,103	122,231	117,647	28.1%
Construction	56,756	49,008	49,951	46,874	45,763	44,387	45,946	-19.0%
Manufacturing	62,379	67,383	67,580	66,323	68,381	67,536	73,843	18.4%
Wholesale trade	61,895	67,598	68,607	69,405	70,017	66,149	67,268	8.7%
Retail trade	30,101	30,741	30,163	29,400	28,593	27,949	28,756	-4.5%
Transportation and warehousing	52,743	51,059	48,926	47,867	50,197	46,723	47,945	-9.1%
Information	52,601	56,053	55,588	54,000	51,319	52,269	51,030	-3.0%
Finance and insurance	56,941	54,691	55,854	52,578	45,206	43,473	42,532	-25.3%
Real estate and rental and leasing	20,320	16,704	15,331	12,752	15,526	17,162	16,717	-17.7%
Professional and technical services	46,700	49,331	49,991	48,899	51,800	51,261	53,268	14.1%
Management of companies and enterprises	90,850	94,094	95,628	106,059	101,137	98,211	106,340	17.0%
Administrative and waste services	25,403	26,469	26,452	27,648	29,085	30,658	30,067	18.4%
Educational services	22,930	23,080	23,823	24,200	24,985	25,243	25,017	9.1%
Health care and social assistance	48,145	49,604	49,390	48,476	49,861	49,883	49,620	3.1%
Arts, entertainment, and recreation	19,556	15,859	16,079	14,957	12,986	12,831	12,606	-35.5%
Accommodation and food services	17,159	16,843	16,503	17,208	16,805	16,958	17,820	3.9%
Other services, except public administration	30,227	31,145	30,758	30,515	29,336	28,941	29,934	-1.0%
Government and government enterprises	50,875	54,577	53,343	52,434	52,747	54,523	55,015	8.1%
Average	44,664	45,566	45,356	44,678	45,187	44,310	45,480	1.83%

Table 3.B.4
Total Employment and Real Personal Income
 3. NEFCO Region
 1969–2010 BEA Data, 2011 Dollars

Year	1,000s of 2011 Dollars						Per Capita Income	Total Employment	Real Average Earnings Per Job
	Earnings	Social Security Contributions	Residents Adjustments	Dividends, Interest, Rents	Transfer Payments	Personal Income			
1969	18,096,189	1,243,156	686,447	2,551,679	1,457,997	21,549,157	19,033	478,528	37,816
1970	17,849,714	1,205,680	559,832	2,628,929	1,623,659	21,456,455	18,836	477,940	37,347
1971	17,585,696	1,219,831	594,069	2,683,201	1,818,221	21,461,357	18,786	467,920	37,583
1972	18,657,217	1,365,503	622,089	2,738,589	1,940,971	22,593,361	19,842	480,416	38,836
1973	19,749,125	1,671,511	693,208	2,825,810	2,152,429	23,749,061	20,681	501,281	39,397
1974	19,669,567	1,715,304	732,488	2,937,941	2,344,275	23,968,966	20,958	510,879	38,501
1975	18,375,372	1,548,261	764,430	2,880,232	2,800,301	23,272,074	20,313	492,511	37,310
1976	18,931,373	1,618,181	896,231	2,924,123	2,849,249	23,982,795	21,078	493,810	38,337
1977	20,036,754	1,721,477	1,075,215	3,073,009	2,771,375	25,234,876	22,283	511,830	39,147
1978	20,921,543	1,861,128	1,222,390	3,255,472	2,764,607	26,302,884	23,227	528,681	39,573
1979	21,247,594	1,967,718	1,322,098	3,462,436	2,908,764	26,973,173	23,766	536,479	39,606
1980	20,390,349	1,878,461	1,336,564	3,912,936	3,353,589	27,114,978	23,856	526,294	38,743
1981	20,170,199	1,990,493	1,258,838	4,425,265	3,424,122	27,287,932	24,058	521,876	38,649
1982	19,062,656	1,899,918	1,179,225	4,692,302	3,741,530	26,775,795	23,694	505,753	37,692
1983	18,973,267	1,930,975	1,164,139	4,905,223	3,869,312	26,980,966	23,963	496,946	38,180
1984	20,076,412	2,097,377	1,208,784	5,329,813	3,829,002	28,346,635	25,234	516,259	38,888
1985	20,385,949	2,166,842	1,245,842	5,484,880	3,964,946	28,914,775	25,880	527,812	38,624
1986	20,650,285	2,260,691	1,246,145	5,576,511	4,126,356	29,338,606	26,375	535,305	38,577
1987	21,223,917	2,324,033	1,239,662	5,508,275	4,203,128	29,850,949	26,829	550,355	38,564
1988	22,020,137	2,482,379	1,260,584	5,691,155	4,272,845	30,762,342	27,425	563,456	39,080
1989	22,426,261	2,551,736	1,318,999	6,298,840	4,416,569	31,908,933	28,367	575,127	38,994
1990	22,635,973	2,626,851	1,330,425	6,240,515	4,765,818	32,345,880	28,664	583,420	38,799
1991	22,425,846	2,656,501	1,303,835	6,071,872	4,879,951	32,025,004	28,163	583,771	38,415
1992	23,421,981	2,765,646	1,339,484	6,052,795	5,238,998	33,287,613	29,052	584,562	40,068
1993	24,195,454	2,892,588	1,301,714	6,055,012	5,348,606	34,008,199	29,474	599,374	40,368
1994	25,214,151	3,055,049	1,394,371	6,407,836	5,448,858	35,410,167	30,522	619,087	40,728
1995	25,868,045	3,155,877	1,446,361	6,751,579	5,630,214	36,540,322	31,324	636,619	40,633
1996	26,430,247	3,196,331	1,510,975	6,970,342	5,744,120	37,459,352	31,916	647,445	40,822
1997	27,107,826	3,197,175	1,648,964	7,445,891	5,821,602	38,827,108	32,994	658,767	41,149
1998	28,760,414	3,267,692	1,832,362	7,914,154	5,863,857	41,103,095	34,865	661,048	43,507
1999	29,353,787	3,297,287	2,181,682	7,726,835	5,958,453	41,923,470	35,452	670,673	43,768
2000	30,148,957	3,260,190	2,324,686	7,962,834	6,211,881	43,388,167	36,594	678,731	44,420
2001	29,981,587	3,228,210	2,085,074	7,286,312	6,613,321	42,738,084	35,988	671,266	44,664
2002	30,299,776	3,187,408	1,946,869	6,693,327	6,939,509	42,692,073	35,903	668,208	45,345
2003	30,836,525	3,265,412	1,962,935	6,480,574	7,121,889	43,136,510	36,221	667,464	46,200
2004	31,291,506	3,388,031	2,008,189	6,150,501	7,206,874	43,269,040	36,308	676,299	46,269
2005	31,275,688	3,404,009	1,921,899	6,174,453	7,360,838	43,328,869	36,345	686,376	45,566
2006	31,142,274	3,426,067	1,950,697	6,723,417	7,547,886	43,938,208	36,834	686,615	45,356
2007	30,940,265	3,420,023	1,891,666	7,396,084	7,817,889	44,625,881	37,359	692,519	44,678
2008	31,160,635	3,519,733	1,705,722	7,729,496	8,281,054	45,357,175	37,954	689,590	45,187
2009	29,184,676	3,369,159	1,650,255	6,257,075	9,306,626	43,029,472	36,033	658,650	44,310
2010	29,805,607	3,396,591	1,736,148	6,312,503	9,606,852	44,064,518	36,943	655,350	45,480

C. BLS DATA

This section contains Bureau of Labor Statistics (BLS) data that address employment and income.

Table 3.C.1
Labor Force Statistics
 3. NEFCO Region
 1990–2011 BLS Data

Year	Labor Force	Employment	Unemployment	Unemployment Rate	Statewide Unemployment Rate
1990	568,049	537,077	30,972	5.5%	5.7%
1991	574,136	537,870	36,266	6.3%	6.6%
1992	582,675	541,035	41,640	7.1%	7.4%
1993	585,122	548,190	36,932	6.3%	6.7%
1994	592,731	561,747	30,984	5.2%	5.6%
1995	599,172	571,785	27,387	4.6%	4.9%
1996	607,473	577,620	29,853	4.9%	5.0%
1997	608,214	580,433	27,781	4.6%	4.6%
1998	605,062	580,526	24,536	4.1%	4.3%
1999	608,060	582,193	25,867	4.3%	4.3%
2000	616,959	592,093	24,866	4.0%	4.0%
2001	618,398	591,265	27,133	4.4%	4.4%
2002	618,038	582,380	35,658	5.8%	5.7%
2003	620,962	582,585	38,377	6.2%	6.2%
2004	623,456	585,502	37,954	6.1%	6.1%
2005	629,220	592,754	36,466	5.8%	5.9%
2006	632,164	598,818	33,346	5.3%	5.4%
2007	635,390	600,876	34,514	5.4%	5.6%
2008	638,142	598,163	39,979	6.3%	6.5%
2009	633,951	569,279	64,672	10.2%	10.1%
2010	625,893	561,961	63,932	10.2%	10.0%
2011	616,581	563,459	53,122	8.6%	8.6%

D. HMDA DATA

The Home Mortgage Disclosure Act (HMDA) requires both depository and non-depository lenders to collect and publicly disclose information about housing-related loans and loan applications.¹⁰ The information presented in this section presents detailed HMDA data, including denial rates and predatory lending including high annual percentage rate (APR) loans.

Table 3.D.1
Purpose of Loan by Year
3. NEFCO Region
2004–2011 HMDA Data

Purpose	2004	2005	2006	2007	2008	2009	2010	2011	Total
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
Total	122,057	124,980	112,717	80,511	53,882	60,495	54,377	48,480	657,499

Table 3.D.2
Occupancy Status for Home Purchase Loan Applications
3. NEFCO Region
2004–2011 HMDA Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	Total
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
Total	36,838	42,617	39,787	27,613	18,913	17,741	15,860	15,196	214,565

Table 3.D.3
Owner-Occupied Home Purchase Loan Applications by Loan Type
3. NEFCO Region
2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Conventional	29,141	34,223	31,795	21,122	9,648	6,486	5,948	6,536	144,899
FHA - Insured	3,156	3,000	2,807	2,903	6,984	9,371	8,069	6,457	42,747
VA - Guaranteed	473	549	517	467	553	695	730	770	4,754
Rural Housing Service or Farm Service Agency	48	37	39	83	194	425	354	554	1,734
Total	32,818	37,809	35,158	24,575	17,379	16,977	15,101	14,317	194,134

¹⁰ Data are considered “raw” because they contain entry errors and incomplete loan applications. Starting in 2004, the HMDA data made substantive changes in reporting. It modified the way it handled Hispanic data, loan interest rates, and the reporting of multifamily loan applications.

DENIAL RATES

Table 3.D.4
Loan Applications by Action Taken
 3. NEFCO Region
 2004–2011 HMDA Data

Action	2004	2005	2006	2007	2008	2009	2010	2011	Total
Loan Originated	18,579	20,405	18,635	13,537	9,545	8,753	7,746	7,045	104,245
Application Approved but not Accepted	2,063	2,291	2,048	1,181	700	404	426	344	9,457
Application Denied	3,300	4,236	3,932	2,637	1,635	1,244	1,176	1,117	19,277
Application Withdrawn by Applicant	1,945	2,839	2,073	1,148	876	735	750	691	11,057
File Closed for Incompleteness	654	630	537	360	194	158	123	109	2,765
Loan Purchased by the Institution	6,277	7,366	7,923	5,707	4,426	5,680	4,880	5,011	47,270
Preapproval Request Denied	0	40	10	5	3	2	0	0	60
Preapproval Approved but not Accepted	0	2	0	0	0	1	0	0	3
Total	32,818	37,809	35,158	24,575	17,379	16,977	15,101	14,317	194,134
Denial Rate	15.1%	17.2%	17.4%	16.3%	14.6%	12.4%	13.2%	13.7%	15.6%

Table 3.D.5
Denial Rates by Gender of Applicant
 3. NEFCO Region
 2004–2011 HMDA Data

Year	Male	Female	Not Available	Not Applicable	Average
2004	13.1%	16.9%	43.6%	.0%	15.1%
2005	15.0%	20.5%	33.9%	.0%	17.2%
2006	15.3%	20.0%	35.6%	.0%	17.4%
2007	14.4%	18.6%	39.1%	.0%	16.3%
2008	13.4%	15.7%	29.5%	.0%	14.6%
2009	12.2%	12.1%	21.2%	%	12.4%
2010	12.3%	14.3%	19.6%	50.0%	13.2%
2011	12.9%	13.7%	23.2%	25.0%	13.7%
Average	13.9%	17.5%	32.5%	6.3%	15.6%

Table 3.D.6
Loan Applications by Selected Action Taken by Gender of Applicant
 3. NEFCO Region
 2004–2011 HMDA Data

Gender		2004	2005	2006	2007	2008	2009	2010	2011	Total
Male	Originated	13,087	14,108	12,628	9,469	6,485	5,831	5,187	4,700	71,495
	Denied	1,972	2,482	2,284	1,590	1,005	809	726	698	11,566
	Denial Rate	13.1%	15.0%	15.3%	14.4%	13.4%	12.2%	12.3%	12.9%	13.9%
Female	Originated	5,120	5,769	5,524	3,772	2,786	2,662	2,254	2,018	29,905
	Denied	1,043	1,485	1,383	863	518	365	375	320	6,352
	Denial Rate	16.9%	20.5%	20.0%	18.6%	15.7%	12.1%	14.3%	13.7%	17.5%
Not Available	Originated	369	525	479	286	268	260	304	324	2,815
	Denied	285	269	265	184	112	70	74	98	1,357
	Denial Rate	43.6%	33.9%	35.6%	39.1%	29.5%	21.2%	19.6%	23.2%	32.5%
Not Applicable	Originated	3	3	4	10	6	0	1	3	30
	Denied	0	0	0	0	0	0	1	1	2
	Denial Rate	.0%	.0%	.0%	.0%	.0%	%	50.0%	25.0%	6.3%
Total	Originated	18,579	20,405	18,635	13,537	9,545	8,753	7,746	7,045	104,245
	Denied	3,300	4,236	3,932	2,637	1,635	1,244	1,176	1,117	19,277
	Denial Rate	15.1%	17.2%	17.4%	16.3%	14.6%	12.4%	13.2%	13.7%	15.6%

Table 3.D.7
Denial Rates by Race/Ethnicity of Applicant
 3. NEFCO Region
 2004–2011 HMDA Data

Race/Ethnicity	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	23.8%	32.7%	35.2%	28.0%	38.5%	7.5%	24.1%	17.6%	26.7%
Asian	9.6%	14.0%	17.4%	10.0%	12.3%	17.5%	12.8%	11.6%	13.2%
Black	24.6%	28.8%	33.7%	36.2%	28.1%	20.5%	22.9%	23.0%	29.2%
White	12.9%	14.8%	14.5%	13.7%	13.0%	11.6%	12.2%	12.3%	13.5%
Not Available	36.5%	31.4%	34.0%	35.8%	27.4%	20.7%	20.2%	26.0%	31.2%
Not Applicable	26.1%	.0%	.0%	.0%	.0%	0%	0.0%	33.3%	14.3%
Average	15.1%	17.2%	17.4%	16.3%	14.6%	12.4%	13.2%	13.7%	15.6%
Non-Hispanic	13.4%	15.7%	16.1%	15.0%	13.9%	12.0%	12.6%	12.7%	14.4%
Hispanic	24.7%	28.6%	23.3%	21.0%	10.1%	12.5%	17.6%	15.3%	21.6%

Table 3.D.8
Loan Applications by Selected Action Taken by Race/Ethnicity of Applicant
 3. NEFCO Region
 2004–2011 HMDA Data

Race		2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Originated	32	33	35	36	16	37	22	14	225
	Denied	10	16	19	14	10	3	7	3	82
	Denial Rate	23.8%	32.7%	35.2%	28.0%	38.5%	24.1%	24.1%	17.6%	26.7%
Asian	Originated	312	277	281	216	179	151	143	129	1,688
	Denied	33	45	59	24	25	32	21	17	256
	Denial Rate	9.6%	14.0%	17.4%	10.0%	12.3%	17.5%	12.8%	11.6%	13.2%
Black	Originated	1,020	1,308	1,255	657	409	325	266	258	5,498
	Denied	332	528	637	373	160	84	79	77	2,270
	Denial Rate	24.6%	28.8%	33.7%	36.2%	28.1%	20.5%	22.9%	23.0%	29.2%
White	Originated	16,323	17,440	16,116	12,046	8,479	7,864	6,888	6,218	91,374
	Denied	2,415	3,031	2,731	1,907	1,268	1,027	961	870	14,210
	Denial Rate	12.9%	14.8%	14.5%	13.7%	13.0%	11.6%	12.2%	12.3%	13.5%
Not Available	Originated	875	1,344	944	573	456	376	426	424	5,418
	Denied	504	616	486	319	172	98	108	149	2,452
	Denial Rate	36.5%	31.4%	34.0%	35.8%	27.4%	20.7%	20.2%	26.0%	31.2%
Not Applicable	Originated	17	3	4	9	6	0	1	2	42
	Denied	6	0	0	0	0	0	0	1	7
	Denial Rate	36.5%	31.4%	34.0%	35.8%	27.4%	20.7%	20.2%	26.0%	14.3%
Total	Originated	18,579	20,405	18,635	13,537	9,545	8,753	7,746	7,045	104,245
	Denied	3,300	4,236	3,932	2,637	1,635	1,244	1,176	1,117	19,277
	Denial Rate	15.1%	17.2%	17.4%	16.3%	14.6%	12.4%	13.2%	13.7%	15.6%
Non-Hispanic	Originated	15,824	18,726	17,483	12,818	8,930	8,248	7,203	6,543	95,775
	Denied	2,451	3,496	3,349	2,257	1,439	1,121	1,043	953	16,109
	Denial Rate	13.4%	15.7%	16.1%	15.0%	13.9%	12.0%	12.6%	12.7%	14.4%
Hispanic	Originated	204	210	184	128	98	91	89	72	1,076
	Denied	67	84	56	34	11	13	19	13	297
	Denial Rate	24.7%	28.6%	23.3%	21.0%	10.1%	12.5%	17.6%	15.3%	21.6%

Table 3.D.9
Loan Applications by Reason for Denial
 3. NEFCO Region
 2004–2011 HMDA Data

Denial Reason	2004	2005	2006	2007	2008	2009	2010	2011	Total
Debt-to-Income Ratio	392	506	451	384	288	246	253	192	2,712
Employment History	51	58	48	58	37	33	47	31	363
Credit History	693	908	728	538	381	278	277	248	4,051
Collateral	229	339	378	316	264	230	224	218	2,198
Insufficient Cash	62	75	59	50	28	30	34	28	366
Unverifiable Information	76	157	136	135	52	42	27	34	659
Credit Application Incomplete	242	315	234	250	136	91	99	162	1,529
Mortgage Insurance Denied	2	0	5	0	7	11	6	3	34
Other	669	1,037	694	280	112	83	96	75	3,046
Missing	884	841	1,199	626	330	200	113	126	4,319
Total	3,300	4,236	3,932	2,637	1,635	1,244	1,176	1,117	19,277

Table 3.D.10
Denial Rates by Income of Applicant
 3. NEFCO Region
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	46.6%	53.6%	45.0%	55.1%	50.4%	51.8%	49.1%	53.9%	50.2%
\$15,001–\$30,000	26.5%	30.4%	29.0%	26.0%	24.5%	17.3%	21.9%	20.3%	26.0%
\$30,001–\$45,000	17.0%	18.9%	20.3%	17.9%	16.8%	12.9%	13.7%	14.7%	17.4%
\$45,001–\$60,000	13.1%	14.9%	15.7%	15.3%	13.4%	10.7%	10.7%	12.7%	13.9%
\$60,001–\$75,000	9.3%	12.5%	13.4%	13.9%	10.3%	10.0%	9.6%	11.7%	11.6%
Above \$75,000	7.7%	9.6%	10.9%	11.0%	9.3%	8.5%	9.1%	9.6%	9.6%
Data Missing	22.6%	21.5%	17.0%	19.4%	21.3%	32.6%	30.8%	28.3%	21.5%
Total	15.1%	17.2%	17.4%	16.3%	14.6%	12.4%	13.2%	13.7%	15.6%

Table 3.D.11
Denial Rates of Loans by Race/Ethnicity and Income of Applicant
 3. NEFCO Region
 2004–2011 HMDA Data

Race	<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	Above \$75K	Data Missing	Average
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%	9.1%	14.3%
Average	50.2%	26.0%	17.4%	13.9%	11.6%	9.6%	21.5%	15.6%
Non-Hispanic Ethnicity	48.9%	24.0%	16.0%	13.0%	10.9%	8.9%	17.1%	14.4%
Hispanic (Ethnicity)	66.7%	32.4%	23.2%	19.5%	16.7%	14.3%	18.8%	21.6%

Table 3.D.12
Loan Applications by Reason for Denial by Race/Ethnicity of Applicant
 3. NEFCO Region
 2004–2011 HMDA Data

Denial Reason	American Indian	Asian	Black	White	Not Available	Not Applicable	Total	Hispanic (Ethnicity)
Debt-to-Income Ratio	14	59	285	2,104	250	0	2,712	46
Employment History	2	5	28	306	22	0	363	5
Credit History	16	44	480	3,039	472	0	4,051	63
Collateral	6	30	204	1,731	226	1	2,198	33
Insufficient Cash	3	7	39	270	47	0	366	3
Unverifiable Information	1	17	118	446	77	0	659	8
Credit Application Incomplete	7	23	137	1,168	194	0	1,529	11
Mortgage Insurance Denied	1	0	3	26	4	0	34	2
Other	10	34	398	2,144	455	5	3,046	42
Missing	22	37	578	2,976	705	1	4,319	84
Total	82	256	2,270	14,210	2,452	7	19,277	297
% Missing	26.8%	14.5%	25.5%	20.9%	28.8%	14.3%	22.4%	28.3%

Table 3.D.13
Loan Applications by Income of Applicant: Originated and Denied
 3. NEFCO Region
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Loan Originated	118	117	120	62	58	66	56	35	632
	Application Denied	103	135	98	76	59	71	54	41	637
	Denial Rate	46.6%	53.6%	45.0%	55.1%	50.4%	51.8%	49.1%	53.9%	50.2%
\$15,001–\$30,000	Loan Originated	2,536	2,616	2,300	1,619	1,135	1,325	1,056	932	13,519
	Application Denied	915	1,143	939	570	368	278	296	237	4,746
	Denial Rate	26.5%	30.4%	29.0%	26.0%	24.5%	17.3%	21.9%	20.3%	26.0%
\$30,001–\$45,000	Loan Originated	4,377	4,841	4,209	3,013	2,285	2,216	1,756	1,555	24,252
	Application Denied	895	1,128	1,075	659	461	327	279	268	5,092
	Denial Rate	17.0%	18.9%	20.3%	17.9%	16.8%	12.9%	13.7%	14.7%	17.4%
\$45,001–\$60,000	Loan Originated	3,756	4,032	3,603	2,594	1,873	1,694	1,437	1,209	20,198
	Application Denied	566	707	671	467	290	203	172	176	3,252
	Denial Rate	13.1%	14.9%	15.7%	15.3%	13.4%	10.7%	10.7%	12.7%	13.9%
\$60,001–\$75,000	Loan Originated	2,513	2,715	2,383	1,780	1,195	1,084	958	898	13,526
	Application Denied	258	387	370	288	137	120	102	119	1,781
	Denial Rate	9.3%	12.5%	13.4%	13.9%	10.3%	10.0%	9.6%	11.7%	11.6%
Above \$75,000	Loan Originated	4,704	5,530	5,468	4,249	2,925	2,306	2,409	2,350	29,941
	Application Denied	395	584	666	524	300	215	240	250	3,174
	Denial Rate	7.7%	9.6%	10.9%	11.0%	9.3%	8.5%	9.1%	9.6%	9.6%
Data Missing	Loan Originated	575	554	552	220	74	62	74	66	2,177
	Application Denied	168	152	113	53	20	30	33	26	595
	Denial Rate	22.6%	21.5%	17.0%	19.4%	21.3%	32.6%	30.8%	28.3%	21.5%
Total	Loan Originated	18,579	20,405	18,635	13,537	9,545	8,753	7,746	7,045	104,245
	Application Denied	3,300	4,236	3,932	2,637	1,635	1,244	1,176	1,117	19,277
	Denial Rate	15.1%	17.2%	17.4%	16.3%	14.6%	12.4%	13.2%	13.7%	15.6%

Table 3.D.14
Loan Applications by Income and Race/Ethnicity of Applicant: Originated and Denied
 3. NEFCO Region
 2004–2011 HMDA Data

Race		<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	> \$75K	Data Missing	Total
American Indian	Loan Originated	1	23	59	37	23	79	3	225
	Application Denied	3	23	23	12	8	11	2	82
	Denial Rate	75.0%	50.0%	28.0%	24.5%	25.8%	12.2%	40.0%	26.7%
Asian	Loan Originated	5	151	220	238	231	795	48	1,688
	Application Denied	7	43	57	45	26	71	7	256
	Denial Rate	58.3%	22.2%	20.6%	15.9%	10.1%	8.2%	12.7%	13.2%
Black	Loan Originated	57	1,041	1,380	980	639	1,299	102	5,498
	Application Denied	54	597	568	369	214	414	54	2,270
	Denial Rate	48.6%	36.4%	29.2%	27.4%	25.1%	24.2%	34.6%	29.2%
White	Loan Originated	520	11,659	21,437	17,973	11,953	25,963	1,869	91,374
	Application Denied	502	3,464	3,811	2,459	1,331	2,283	360	14,210
	Denial Rate	49.1%	22.9%	15.1%	12.0%	10.0%	8.1%	16.2%	13.5%
Not Available	Loan Originated	49	640	1,155	966	678	1,785	145	5,418
	Application Denied	71	617	631	365	202	395	171	2,452
	Denial Rate	59.2%	49.1%	35.3%	27.4%	23.0%	18.1%	54.1%	31.2%
Not Applicable	Loan Originated	0	5	1	4	2	20	10	42
	Application Denied	0	2	2	2	0	0	1	7
	Denial Rate	%	28.6%	66.7%	33.3%	.0%	.0%	9.1%	14.3%
Total	Loan Originated	632	13,519	24,252	20,198	13,526	29,941	2,177	104,245
	Application Denied	637	4,746	5,092	3,252	1,781	3,174	595	19,277
	Denial Rate	50.2%	26.0%	17.4%	13.9%	11.6%	9.6%	21.5%	15.6%
Non-Hispanic Ethnicity	Loan Originated	567	12,460	22,510	18,634	12,486	27,190	1,928	95,775
	Application Denied	543	3,926	4,272	2,776	1,523	2,672	397	16,109
	Denial Rate	48.9%	24.0%	16.0%	13.0%	10.9%	8.9%	17.1%	14.4%
Hispanic (Ethnicity)	Loan Originated	7	169	225	207	125	317	26	1,076
	Application Denied	14	81	68	50	25	53	6	297
	Denial Rate	66.7%	32.4%	23.2%	19.5%	16.7%	14.3%	18.8%	21.6%

PREDATORY LENDING

Table 3.D.15
Originated Owner-Occupied Loans by HAL Status
 3. NEFCO Region
 2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Other	16,188	15,336	14,205	11,874	8,410	8,098	7,682	6,995	88,788
HAL	2,391	5,069	4,430	1,663	1,135	655	64	50	15,457
Total	18,579	20,405	18,635	13,537	9,545	8,753	7,746	7,045	104,245
Percent HAL	12.9%	24.8%	23.8%	12.3%	11.9%	7.5%	.8%	.7%	14.8%

Table 3.D.16
Loans by Loan Purpose by HAL Status
 3. NEFCO Region
 2004–2011 HMDA Data

Loan Purpose		2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	Other	16,188	15,336	14,205	11,874	8,410	8,098	7,682	6,995	88,788
	HAL	2,391	5,069	4,430	1,663	1,135	655	64	50	15,457
	Percent HAL	12.9%	24.8%	23.8%	12.3%	11.9%	7.5%	.8%	.7%	14.8%
Home Improvement	Other	2,016	2,241	2,438	1,938	1,526	740	663	711	12,273
	HAL	709	886	870	679	335	177	94	67	3,817
	Percent HAL	26.0%	28.3%	26.3%	25.9%	18.0%	19.3%	12.4%	8.6%	23.7%
Refinancing	Other	21,170	15,024	12,304	10,289	8,098	16,395	16,988	14,075	114,343
	HAL	4,969	6,899	6,148	2,917	1,411	1,026	153	142	23,665
	Percent HAL	19.0%	31.5%	33.3%	22.1%	14.8%	5.9%	.9%	1.0%	17.1%
Total	Other	39,374	32,601	28,947	24,101	18,034	25,233	25,333	21,781	215,404
	HAL	8,069	12,854	11,448	5,259	1,135	655	64	50	42,939
	Percent HAL	17.0%	28.3%	28.3%	17.9%	13.8%	6.9%	1.2%	1.2%	16.6%

Table 3.D.17
HALs Originated by Race of Borrower
 3. NEFCO Region
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	6	9	8	5	2	2	0	0	32
Asian	18	28	36	17	17	9	0	0	125
Black	265	639	688	186	70	47	0	0	1,895
White	1,850	3,689	3,316	1,352	989	579	60	48	11,883
Not Available	251	704	380	103	57	18	3	2	1,518
Not Applicable	1	0	2	0	0	0	1	0	4
Total	2,391	5,069	4,430	1,663	1,135	655	64	50	15,457
Hispanic (Ethnicity)	41	77	49	20	10	7	0	0	204

Table 3.D.18
Rate of HALs Originated by Race/Ethnicity of Borrower
 3. NEFCO Region
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	18.8%	27.3%	22.9%	13.9%	12.5%	5.4%	.0%	.0%	14.2%
Asian	5.8%	10.1%	12.8%	7.9%	9.5%	6.0%	.0%	.0%	7.4%
Black	26.0%	48.9%	54.8%	28.3%	17.1%	14.5%	.0%	.0%	34.5%
White	11.3%	21.2%	20.6%	11.2%	11.7%	7.4%	.9%	.8%	13.0%
Not Available	28.7%	52.4%	40.3%	18.0%	12.5%	4.8%	.7%	.5%	28.0%
Not Applicable	5.9%	.0%	50.0%	.0%	.0%	%	100.0%	.0%	10%
Average	12.9%	24.8%	23.8%	12.3%	11.9%	7.5%	0.8%	0.7%	14.8%
Non-Hispanic Ethnicity	12.5%	22.7%	22.9%	12.1%	11.7%	7.6%	.8%	.7%	14.2%
Hispanic (Ethnicity)	20.1%	36.7%	26.6%	15.6%	10.2%	7.7%	.0%	.0%	19.0%

Table 3.D.19
Loans by HAL Status by Race/Ethnicity of Borrower
 3. NEFCO Region
 2004–2011 HMDA Data

Race	Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Other	26	24	27	31	14	35	22	14	193
	HAL	6	9	8	5	2	2	0	0	32
	Percent HAL	18.8%	27.3%	22.9%	13.9%	12.5%	5.4%	.0%	.0%	14.2%
Asian	Other	294	249	245	199	162	142	143	129	1,563
	HAL	18	28	36	17	17	9	0	0	125
	Percent HAL	5.8%	10.1%	12.8%	7.9%	9.5%	6.0%	.0%	.0%	7.4%
Black	Other	755	669	567	471	339	278	266	258	3,603
	HAL	265	639	688	186	70	47	0	0	1,895
	Percent HAL	26.0%	48.9%	54.8%	28.3%	17.1%	14.5%	.0%	.0%	34.5%
White	Other	14,473	13,751	12,800	10,694	7,490	7,285	6,828	6,170	79,491
	HAL	1,850	3,689	3,316	1,352	989	579	60	48	11,883
	Percent HAL	11.3%	21.2%	20.6%	11.2%	11.7%	7.4%	0.9%	0.8%	13.0%
Not Available	Other	624	640	564	470	399	358	423	422	3,900
	HAL	251	704	380	103	57	18	3	2	1,518
	Percent HAL	28.7%	52.4%	40.3%	18.0%	12.5%	4.8%	.7%	.5%	28.0%
Not Applicable	Other	16	3	2	9	6	0	0	0	38
	HAL	1	0	2	0	0	0	1	0	4
	Percent HAL	5.9%	.0%	50.0%	.0%	.0%	%	100.0%	.0%	10.0%
Total	Other	16,188	15,336	14,205	11,874	8,410	8,098	7,682	6,995	88,788
	HAL	2,391	5,069	4,430	1,663	1,135	655	64	50	15,457
	Percent HAL	12.9%	24.8%	23.8%	12.3%	11.9%	7.5%	.8%	.7%	14.8%
Non-Hispanic Ethnicity	Other	13,851	14,470	13,478	11,273	7,883	7,625	7,144	6,495	82,219
	HAL	1,973	4,256	4,005	1,545	1,047	623	59	48	13,556
	Percent HAL	12.5%	22.7%	22.9%	12.1%	11.7%	7.6%	.8%	.7%	14.2%
Hispanic (Ethnicity)	Other	163	133	135	108	88	84	89	72	872
	HAL	41	77	49	20	10	7	0	0	204
	Percent HAL	20.1%	36.7%	26.6%	15.6%	10.2%	7.7%	.0%	.0%	19.0%

Table 3.D.20
Rates of HALs by Income of Borrower
 3. NEFCO Region
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Average
\$15,000 or Below	14.4%	29.1%	22.5%	25.8%	10.3%	15.2%	.0%	.0%	17.4%
\$15,001–\$30,000	20.7%	36.7%	35.7%	22.2%	22.0%	12.5%	1.4%	1.9%	23.0%
\$30,001–\$45,000	17.2%	33.1%	29.0%	15.0%	14.9%	8.7%	1.2%	.7%	18.9%
\$45,001–\$60,000	14.0%	26.9%	25.8%	12.6%	11.5%	7.0%	.9%	.5%	15.9%
\$60,001–\$75,000	9.4%	21.4%	19.7%	10.4%	9.5%	5.5%	.4%	.7%	12.3%
Above \$75,000	6.2%	12.5%	14.0%	6.5%	7.1%	4.6%	0.5%	.4%	7.9%
Data Missing	8.0%	21.1%	35.3%	22.3%	4.1%	3.2%	.0%	.0%	18.9%
Average	12.9%	24.8%	23.8%	12.3%	11.9%	7.5%	.8%	.7%	14.8%

Table 3.D.21
Loans by HAL Status by Income of Borrower
 3. NEFCO Region
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Other	101	83	93	46	52	56	56	35	522
	HAL	17	34	27	16	6	10	0	0	110
	Percent HAL	14.4%	29.1%	22.5%	25.8%	10.3%	15.2%	.0%	.0%	17.4%
\$15,001–\$30,000	Other	2,011	1,656	1,480	1,260	885	1,160	1,041	914	10,407
	HAL	525	960	820	359	250	165	15	18	3,112
	Percent HAL	20.7%	36.7%	35.7%	22.2%	22.0%	12.5%	1.4%	1.9%	23.0%
\$30,001–\$45,000	Other	3,626	3,240	2,990	2,562	1,945	2,024	1,735	1,544	19,666
	HAL	751	1,601	1,219	451	340	192	21	11	4,586
	Percent HAL	17.2%	33.1%	29.0%	15.0%	14.9%	8.7%	1.2%	.7%	18.9%
\$45,001–\$60,000	Other	3,231	2,948	2,672	2,268	1,658	1,575	1,424	1,203	16,979
	HAL	525	1,084	931	326	215	119	13	6	3,219
	Percent HAL	14.0%	26.9%	25.8%	12.6%	11.5%	7.0%	.9%	.5%	15.9%
\$60,001–\$75,000	Other	2,277	2,133	1,913	1,594	1,081	1,024	954	892	11,868
	HAL	236	582	470	186	114	60	4	6	1,658
	Percent HAL	9.4%	21.4%	19.7%	10.4%	9.5%	5.5%	.4%	.7%	12.3%
Above \$75,000	Other	4,413	4,839	4,700	3,973	2,718	2,199	2,398	2,341	27,581
	HAL	291	691	768	276	207	107	11	9	2,360
	Percent HAL	6.2%	12.5%	14.0%	6.5%	7.1%	4.6%	.5%	.4%	7.9%
Data Missing	Other	529	437	357	171	71	60	74	66	1,765
	HAL	46	117	195	49	3	2	0	0	412
	Percent HAL	8.0%	21.1%	35.3%	22.3%	4.1%	3.2%	.0%	.0%	18.9%
Total	Other	16,188	15,336	14,205	11,874	8,410	8,098	7,682	6,995	88,788
	HAL	2,391	5,069	4,430	1,663	1,135	655	64	50	15,457
	Percent HAL	12.9%	24.8%	23.8%	12.3%	11.9%	7.5%	.8%	.7%	14.8%

E. CRA DATA

Additional data tables related to Community Reinvestment Act (CRA) data are presented in this section.

Table 3.E.1
Small Business Loans Originated: \$100,000 or Less by Tract MFI
 3. NEFCO Region
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	818	1,829	9,930	5,380		17,957
2001	1,209	2,181	10,928	5,719		20,037
2002	1,190	2,401	12,963	6,759		23,313
2003	1,439	2,742	12,536	7,191		23,908
2004	1,349	2,651	12,365	7,253		23,618
2005	1,287	2,696	13,480	8,143		25,606
2006	1,578	3,447	17,099	11,847		33,971
2007	1,673	3,636	18,712	12,925		36,946
2008	1,247	2,811	14,211	9,710		27,979
2009	570	1,054	5,880	4,379		11,883
2010	530	1,038	5,407	3,878		10,853
2011	634	1,298	6,967	4,920		13,819
Total	13,524	27,784	140,478	88,104	0	269,890
Loan Amount (\$1,000s)						
2000	11,638	26,892	128,075	73,653		240,258
2001	16,904	29,007	133,443	72,091		251,445
2002	14,743	28,878	145,415	78,534		267,570
2003	17,140	29,285	130,642	74,946		252,013
2004	15,997	28,924	129,671	81,853		256,445
2005	18,395	28,381	152,018	95,295		294,089
2006	16,958	36,632	176,601	125,119		355,310
2007	18,947	39,612	188,186	135,000		381,745
2008	14,082	28,885	137,011	99,612		279,590
2009	8,683	13,820	69,885	53,305		145,693
2010	7,834	16,156	77,559	54,575		156,124
2011	10,463	19,528	105,685	74,628		210,304
Total	171,784	326,000	1,574,191	1,018,611	0	3,090,586

Table 3.E.2
Small Business Loans Originated: \$100,001 to \$250,000 by Tract MFI
 3. NEFCO Region
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	68	100	390	266		824
2001	75	107	514	322		1,018
2002	79	96	550	318		1,043
2003	81	142	483	286		992
2004	75	141	506	291		1,013
2005	81	114	453	259		907
2006	83	112	475	282		952
2007	71	90	352	274		787
2008	45	68	275	186		574
2009	39	50	222	172		483
2010	41	83	324	249		697
2011	48	78	310	238		674
Total	786	1,181	4,854	3,143	0	9,964
Loan Amount (\$1,000s)						
2000	12,086	17,223	66,800	46,557		142,666
2001	12,909	18,611	90,206	56,572		178,298
2002	14,544	17,250	95,333	55,216		182,343
2003	14,487	24,852	82,938	51,069		173,346
2004	13,219	25,993	89,887	50,757		179,856
2005	14,567	20,085	82,093	46,240		162,985
2006	14,647	20,470	82,736	50,477		168,330
2007	13,245	15,840	61,471	48,925		139,481
2008	7,895	11,659	47,074	33,182		99,810
2009	7,069	8,651	39,315	31,088		86,123
2010	7,788	15,097	55,991	43,993		122,869
2011	8,932	14,099	55,078	41,602		119,711
Total	141,388	209,830	848,922	555,678	0	1,755,818

Table 3.E.3
Small Business Loans Originated: More than \$250,000 by Tract MFI
 3. NEFCO Region
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	43	55	318	256		672
2001	66	94	426	305		891
2002	99	101	566	408		1,174
2003	70	102	510	356		1,038
2004	84	134	491	375		1,084
2005	100	101	460	331		992
2006	75	118	438	323		954
2007	62	102	359	273		796
2008	62	72	252	253		639
2009	41	69	239	196		545
2010	70	85	345	268		768
2011	68	88	321	260		737
Total	840	1,121	4,725	3,604	0	10,290
Loan Amount (\$1,000s)						
2000	21,695	24,233	160,221	127,592		333,741
2001	33,482	48,788	223,089	155,147		460,506
2002	52,944	52,766	300,280	219,351		625,341
2003	37,945	51,589	272,378	190,288		552,200
2004	45,347	69,658	270,722	202,290		588,017
2005	54,746	52,105	249,261	179,476		535,588
2006	38,685	60,772	235,973	175,443		510,873
2007	37,731	57,260	191,554	144,357		430,902
2008	33,027	36,658	138,662	144,690		353,037
2009	21,485	39,327	130,552	108,906		300,270
2010	40,109	46,090	189,679	152,410		428,288
2011	36,647	48,873	169,835	144,492		399,847
Total	453,843	588,119	2,532,206	1,944,442	0	5,518,610

Table 3.E.4
Small Business Loans to Businesses with Gross Annual Revenues of Less Than
\$1 Million by Tract MFI
 3. NEFCO Region
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	289	852	4,158	2,129		7,428
2001	438	843	4,767	2,633		8,681
2002	333	656	3,649	2,149		6,787
2003	421	837	4,156	2,338		7,752
2004	422	843	4,176	2,452		7,893
2005	551	1,162	6,012	3,623		11,348
2006	504	1,223	6,714	4,234		12,675
2007	577	1,271	6,965	4,471		13,284
2008	363	833	4,414	2,764		8,374
2009	203	327	2,100	1,478		4,108
2010	184	382	1,999	1,281		3,846
2011	255	547	3,189	2,209		6,200
Total	4,540	9,776	52,299	31,761	0	98,376
Loan Amount (\$1,000s)						
2000	9,914	33,372	150,722	109,492		303,500
2001	19,005	28,403	194,137	132,932		374,477
2002	23,838	35,021	214,750	163,242		436,851
2003	19,766	35,451	180,467	128,039		363,723
2004	15,451	31,792	158,484	112,401		318,128
2005	21,702	33,059	167,498	120,505		342,764
2006	17,227	30,867	168,779	125,818		342,691
2007	15,459	30,758	152,837	110,449		309,503
2008	13,692	19,713	107,859	84,935		226,199
2009	12,572	13,252	62,278	57,094		145,196
2010	9,355	18,861	86,618	74,112		188,946
2011	11,748	19,559	109,504	72,013		212,824
Total	189,729	330,108	1,753,933	1,291,032	0	3,564,802

F. COMPLAINT DATA

This section contains data regarding fair housing complaints, as provided by the U.S. Department of Housing and Urban Development (HUD), the Ohio Civil Rights Commission (OCRC), and the Fair Housing Contact Service (FHCS).

HUD COMPLAINTS

Table 3.F.1
Fair Housing Complaints by Basis
 3. NEFCO Region
 2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color	1		1	4	12	8	2		1	29
Disability	53	52	71	42	37	50	70	46	31	452
Family Status	23	12	18	26	17	53	37	33	10	229
National Origin	3	2	3	1	2	5	9	1	2	28
Race	56	23	44	28	31	39	28	30	17	296
Religion	1	4	1		2	2	3			13
Sex	12	17	18	6	13	16	13	5	10	110
Total Bases	149	110	156	107	114	173	162	115	71	1,157
Total Complaints	141	98	137	91	81	133	133	108	59	981

Table 3.F.2
Fair Housing Complaints by Issue
 3. NEFCO Region
 2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Discriminatory refusal to sell		3					1	1	3	8
Discriminatory refusal to sell and negotiate for sale	1	1	1			1				4
Discriminatory refusal to rent	21	16	20	25	10	14	15	10	11	142
Discriminatory refusal to negotiate for rental	3		4	3		3	7	3		23
Discriminatory refusal to rent and negotiate for rental	16	7	2	10	5	11	19	1	3	74
Discriminatory advertising, statements, and notices	4	2	2	5	3	9	9	4	4	42
Discriminatory advertising - sale	2									2
Discriminatory advertisement - rental	3		2	1	1	31	9	24	3	74
False denial or representation of availability									1	1
False denial or representation of availability - sale							1			1
False denial or representation of availability - rental	3		3	2	3	4	1	1		17
Discriminatory financing (includes real estate transactions)	2		1	1	3			1		8
Discrimination in making of loans	7	1					2	1		11
Discrimination in the terms or conditions for making loans	2		1				1	2	1	7
Discrimination in the brokering of residential real property		1								1
Discrimination in the appraising of residential real property				1						1
Discriminatory brokerage service							1			1
Discrimination in terms and conditions of membership	2	1								3
Discriminatory terms, conditions, privileges, or services and facilities	17	15	19	17	20	19	20	19	24	170
Discrimination in terms, conditions, privileges relating to sale	2	1	1		2				2	8
Discrimination in terms, conditions or privileges relating to rental	30	18	30	16	22	30	46	19	9	220
Discrimination in services and facilities relating to rental	3	2	6	3	2	2	2	2	1	23
Refusing to provide insurance	1				1					2
Steering	1			2			1			4
Redlining	1									1
Otherwise deny or make housing available	3		1	2	1	1	1	3	10	22
Other discriminatory acts	18	10	14	3	14	3	7	2	4	75
Restriction of choices relative to a sale	1									1
Restriction of choices relative to a rental	2					2				4
Adverse action against an employee						2				2
Refusing to provide municipal services or property				1				1		2
Discriminatory acts under Section 818 (coercion, etc.)	1	3	11	5	1	9	15	8	6	59
Using ordinances to discriminate in zoning and land use							1			1
Non-compliance with design and construction requirements (handicap)	2		15	3	1			3	8	32
Failure to provide an accessible building entrance	1		4							5
Failure to provide accessible and usable public and common user areas	2	1	12	1				3		19
Failure to provide usable doors			1							1
Failure to provide an accessible route into and thru the covered unit	1	1	5	2				1		10
Failure to provide usable kitchens and bathrooms	1	1								2
Failure to permit reasonable modification		1	2					3	3	9
Failure to make reasonable accommodation	24	17	18	15	8	24	44	25	14	189
Total Issues	177	102	175	118	97	165	203	137	107	1,281
Total Complaints	141	98	137	91	81	133	133	108	59	981

Table 3.F.3
Fair Housing Complaints by Closure Status
 3. NEFCO Region
 2004–2012 HUD Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Administrative Closure	11	5	13	16	14	25	8	11	5	108
Cause (FHAP)	22	7	25	11	4	28	29	27		153
Charged (HUD)					1	3				4
Conciliated / Settled	50	46	54	31	21	35	54	29	13	333
No Cause	58	40	45	33	41	42	38	29		326
Open							4	12	41	57
Total Complaints	141	98	137	91	81	133	133	108	59	981

HUD Complaints Found With Cause

Table 3.F.4
Fair Housing Complaints Found With Cause by Basis
 3. NEFCO Region
 2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color			1	3		2	1			7
Disability	28	33	50	22	14	27	53	20	4	251
Family Status	16	7	10	16	12	30	23	25	5	144
National Origin	2	1	3	1		5	2	1		15
Race	26	12	16	7	3	17	7	8	4	100
Religion						1	1			2
Sex	7	7	6	2	1	9	7	3	1	43
Total Bases	79	60	86	51	30	91	94	57	14	562
Total Complaints	72	53	79	42	26	66	83	56	13	490

Table 3.F.5
Fair Housing Complaints Found With Cause by Issue
 3. NEFCO Region
 2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Discriminatory refusal to sell		1						1	1	3
Discriminatory refusal to sell and negotiate for sale	1	1				1				3
Discriminatory refusal to rent	13	8	7	12	2	8	12	7	4	73
Discriminatory refusal to negotiate for rental	2		2	3		3	4	1		15
Discriminatory refusal to rent and negotiate for rental	10	3		7	3	9	18			50
Discriminatory advertising, statements, and notices	2	1		4	2	9	6	2	2	28
Discriminatory advertising - sale	1									1
Discriminatory advertisement - rental	2			1	1	11	7	19	2	43
False denial or representation of availability - rental	3		2	2	1	3	1	1		13
Discriminatory financing (includes real estate transactions)	1									1
Discrimination in making of loans	2									2
Discrimination in the terms or conditions for making loans	1						1	1		3
Discriminatory brokerage service							1			1
Discrimination in terms and conditions of membership		1								1
Discriminatory terms, conditions, privileges, or services and facilities	5	7	14	8	5	9	9	9	5	71
Discrimination in terms, conditions, privileges relating to sale									1	1
Discrimination in terms, conditions or privileges relating to rental	14	8	12	4	6	14	30	8	2	98
Discrimination in services and facilities relating to rental	1		5	2	1	2	2	1		14
Refusing to provide insurance					1					1
Steering	1			2			1			4
Otherwise deny or make housing available	1			2		1		1	1	6
Other discriminatory acts	10	7	6	1	2	2	1	1	2	32
Restriction of choices relative to a rental	1					2				3
Adverse action against an employee						2				2
Discriminatory acts under Section 818 (coercion, etc.)		1	5	1	1	4	6	4	1	23
Non-compliance with design and construction requirements (handicap)	2		12	3	1					18
Failure to provide an accessible building entrance	1		4							5
Failure to provide accessible and usable public and common user areas	2	1	10	1						14
Failure to provide usable doors			1							1
Failure to provide an accessible route into and thru the covered unit	1	1	5	2						9
Failure to provide usable kitchens and bathrooms	1	1								2
Failure to permit reasonable modification		1	2					2		5
Failure to make reasonable accommodation	15	13	13	9	5	14	35	14	3	121
Total Issues	93	55	100	64	31	94	134	72	24	667
Total Complaints	72	53	79	42	26	66	83	56	13	490

OHIO CIVIL RIGHTS COMMISSION COMPLAINTS

Table 3.F.6
Fair Housing Complaints by Basis
 3. NEFCO Region
 2004–2012 OCRC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Age			1							1
Ancestry				1			1			2
Color	7	6	13	2	7	7	10	9	3	64
Disability	60	46	79	52	32	43	59	45	5	421
Family Status	21	5	15	24	22	19	22	11	4	143
Gender	15	14	30	9	13	13	7	11	5	117
National Origin	2	3	4	1	2	6	4	4	2	28
Race	44	34	51	33	33	19	19	34	10	291
Religion	3	3	3	2	2	1	2	1		17
Retaliation	12	18	30	13	16	13	7	60	3	172
Other	4		4	3					1	12
Total Bases	168	129	230	140	127	135	131	175	33	1,268
Total Complaints	135	98	159	102	79	92	101	141	22	929

Table 3.F.7
Fair Housing Complaints by Issue
 3. NEFCO Region
 2004–2012 OCRC Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Advertising	6		2	1		1	2	7	2	21
Constructive Discharge			1							1
Demotion						1				1
Exclusion	5			1	4	5				15
Harassment	12	4	18	2	9	5	9	9	1	69
Intimidation	8	3	26	8	16	8	13	16	3	101
Other	73	45	34	14	15	17	16	51	18	283
Reasonable Accommodation	15	10	28	11		6	42	20	3	135
Sexual Harassment	7	2	8	2	2	1	2			24
Terms and Conditions	43	46	114	79	59	66	66	73	7	553
Total Issues	169	110	231	118	105	110	150	176	34	1,203
Total Complaints	135	98	159	102	79	92	101	141	22	929

Table 3.F.8
Fair Housing Complaints by Closure Status
 3. NEFCO Region
 2004–2012 OCRC Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Administrative Closure	6	2	3		7	17	9	15		59
CP Failed to Cooperate	3	1	5	13	1	1	3	3	2	32
CP Withdrawal – No Benefit	10	4	9	4	11	3	5	5	3	54
Failure to Locate Charging Party			1							1
Hearings Discrimination Finding			1							1
No Cause Finding Issued	54	51	56	43	42	29	27	30		332
No Jurisdiction	1	1	3		1	1	2	5	4	18
Open Charge Closed By Legal Activity		1	4			5				10
Settlement With Benefits	32	22	46	18	9	21	34	21	8	211
Successful Conciliation	3	3	11	8		5	8	3		41
Withdrawal With Benefits	23	13	20	16	8	10	13	59	5	167
Missing	3									3
Total Complaints	135	98	159	102	79	92	101	141	22	929

FAIR HOUSING CONTACT SERVICE COMPLAINTS

Table 3.F.9
Fair Housing Complaints by Basis
 3. NEFCO Region
 2004–2012 FHCS Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Advertising	5									5
Age					1	1		1		3
Ancestry				1	1				1	3
Color	3	4	9	7	7			3	1	34
Criminal Background					2	2			1	5
Disability	31	8	81	69	75	66	86	85	51	552
Familial Status	15	4	42	26	41	30	37	40	9	244
Harassment				3	7	3	3			16
National Origin			14	3	9	10	5	4	2	47
Race	22	8	55	35	39	42	30	31	17	279
Retaliation	1		15	10	15	19	9	8	5	82
Sex	6	3	20	12	16	18	15	11	18	119
Other				6	15	9	3	1	1	35
None			14							14
Unknown				5	1					6
Total Bases	83	27	250	177	229	200	188	184	106	1,444
Total Complaints	66	21	201	137	187	145	159	171	92	1,179

Table 3.F.10
Fair Housing Complaints by Closure Status
 3. NEFCO Region
 2004–2012 FHCS Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Closed			71	48	51	60	15	22	4	271
Dismissed			6	1	3	2	1	1		14
Elected not to pursue						12	12	6	13	43
Independently resolved						25	16	20	6	67
Inquiry			48	33	79	3	1	3	17	184
Lack of jurisdiction					12				1	13
No contact							45	50	9	104
No probable cause			22	22	16	12	6	9		87
Pending			13	19	2	1	1	3	8	47
Probable cause			8	4		7	22	21	1	63
Reasonable accommodation granted				1			5	8	7	21
Reasonable modification granted							1	3	2	6
Referred for other assistance							8	3	9	20
Settled			33	6	8	22	26	18	11	124
Settled through OCRC					10	1			1	12
Withdrawal of Charge					5			4	3	12
Missing	66	21		3	1					91
Total Complaints	66	21	201	137	187	145	159	171	92	1,179

THE HOUSING RESEARCH AND ADVOCACY CENTER

Table 3.F.11
Fair Housing Complaints by Basis

3 NEFCO Region
2004–2012 HRAC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability				1				1		2
Race				1			1			2
Sex				1			1			2
Accessibility						1				1
Total Bases	0	0	0	3	0	1	2	1	0	7
Total Complaints				2		1	2	1		6

Table 3.F.12
Fair Housing Complaints by Issue

3 NEFCO Region
2004–2012 HRAC Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Rental				1		1	2	1		5
Sale				1						1
Total	0	0	0	2	0	1	2	1	0	6
Total Complaints				2		1	2	1		6

Table 3.F.13
Fair Housing Complaints by Action Taken

3 NEFCO Region
2004–2012 HRAC Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Referred to OCRC				2			1			3
Fair Housing Info Given						1				1
Total	0	0	0	2	0	1	1	0	0	4
Total Complaints				2		1	2	1		6

G. FAIR HOUSING SURVEY FOR HOUSING STAKEHOLDERS DATA

This section presents public involvement data gathered through the 2012–2013 Fair Housing Survey for Housing Stakeholders.

Table 3.G.1

Primary Role of Respondent

3. NEFCO Region

2012–2013 Fair Housing Survey for Housing Stakeholders Data

Primary Role	Total
Advocate/Service Provider	15
Condo or Homeowner Association Leader	1
Construction/Development	5
Law/Legal Services	4
Local Government	7
Property Management	5
Real Estate	3
Resident Advisory Council Leader	1
Other Role	7
Total	48

FEDERAL, STATE, AND LOCAL LAWS

Table 3.G.2

Familiarity with Fair Housing Laws

3. NEFCO Region

2012–2013 Fair Housing Survey for Housing Stakeholders Data

Familiarity	Total
Not Familiar	4
Somewhat Familiar	12
Very Familiar	20
Missing	12
Total	48

Table 3.G.3

Perceptions About Fair Housing Laws

3. NEFCO 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?	29	6	1	12	48
Are fair housing laws difficult to understand or follow?	15	19	1	13	48
Do you think fair housing laws should be changed?	10	15	10	13	48
Do you think fair housing laws are adequately enforced?	26	4	3	15	48

Table 3.G.4
Fair Housing Activities

3. NEFCO Region
 2012–2013 Fair Housing Survey for Housing Stakeholders Data

2012 - 2016 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?		26	4	3	15	48
Have you participated in fair housing training?		24	5	1	18	48
Are you aware of any fair housing testing?		21	9	3	15	48
Testing and education	Too Little	Right Amount	Too Much	Don't Know	Missing	Total
Is there sufficient outreach and education activity?	13	10	3	7	15	48
Is there sufficient testing?	9	7		17	15	48

Table 3.G.5

Protected Classes

3. NEFCO Region
 2012–2013 Fair Housing Survey
 for Housing Stakeholders Data

Protected Class	Total
Family Status	19
Religion	14
Gender	14
National Origin	8
Color	11
Sexual Orientation	7
Age	6
Military	8
Disability	3
Ancestry	2
Ethnicity	1
Race	1
Other	8
Total	103

Table 3.G.6
Fair Housing Violation Referrals
 3. NEFCO Region
 2012–2013 Fair Housing Survey for Housing
 Stakeholders Data

Referral	Total
Fair Housing Contact Service	17
Fair Housing Advocates Association	7
HUD	4
Other	3
City	2
City of Canton Fair Housing	2
Lawyer	2
Legal Aid	2
OCRC	2
Stark County Fair Housing Department	2
Would not refer	2
Fair Housing Contact Service	17
ACLU	1
County	1
Total	47

LOCAL FAIR HOUSING

Table 3.G.7
Local Fair Housing
 3. NEFCO 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?	16	9	3	20	48
Are there any specific geographic areas that have fair housing problems?	4	13	11	20	48
Are there any specific groups in that face housing discrimination?	10	8	11	19	48

FAIR HOUSING IN THE PRIVATE SECTOR

Table 3.G.8
Barriers to Fair Housing in the Private Sector
 3. NEFCO Region
 2012–2013 Fair Housing Survey for Housing Stakeholders Data

Question	Yes	No	Don't Know	Missing	Total
Are you aware of any questionable practices or barriers to fair housing choice in:					
The rental housing market?	15	11	7	15	48
The real estate industry?	5	15	11	17	48
The mortgage and home lending industry?	2	15	15	16	48
The housing construction or accessible housing design fields?	4	16	12	16	48
The home insurance industry?	1	15	16	16	48
The home appraisal industry?	2	13	16	17	48
Any other housing services?	1	15	15	17	48

FAIR HOUSING IN THE PUBLIC SECTOR

Table 3.G.9
Barriers to Fair Housing in the Public Sector
 3. NEFCO Region
 2012–2013 Fair Housing Survey for Housing Stakeholders Data

Question	Yes	No	Don't Know	Missing	Total
Are you aware of any questionable practices or barriers to fair housing choice in:					

Land use policies?	7	12	10	19	48
Zoning laws?	6	13	10	19	48
Occupancy standards or health and safety codes?	2	13	14	19	48
Property tax policies?	2	14	13	19	48
Permitting process?	3	10	16	19	48
Housing construction standards?	3	12	14	19	48
Neighborhood or community development policies?	2	12	15	19	48
Limited access to government services, such as employment services?	4	17	8	19	48
Public administrative actions or regulations?	2	13	14	19	48

NARRATIVE COMMENTS

Federal, State, and Local Laws

Table 3.G.10
How did you become aware of fair housing laws?

3. NEFCO Region
2013 Fair Housing Survey Data

Comments:
<p>As a landlord, I must know "the rules".</p> <p>Attending meetings with Fair Housing staff. Training from Portage County Regional Planning</p> <p>Been involved with low income housing for 15 years, training in various settings</p> <p>Education</p> <p>From Vince Curry (FHAA) Akron, Ohio about 12 years ago.</p> <p>I am a civil rights attorney specializing in housing law.</p> <p>I am an attorney on the housing team.</p> <p>I am responsible for administering the CDBG/housing programs and ensuring compliance with all applicable regulations, including fair housing requirements.</p> <p>I became familiar with fair housing laws in connection with the housing programs our PHA administers.</p> <p>I did some property management (landlord) - almost all laws are heavily biased toward the tenant. If tenants know the laws, they can game the system and easily get 2 to 3 months free rent before they are thrown out by the sheriff and the owner not only loses rent but also damages to the property and legal fees. So called "fair" housing doesn't seem to address this side of the equation.</p> <p>I have taken trainings and read in this area.</p> <p>I have worked with the Fair Housing Board and Community Legal Aid with regard to housing issues.</p> <p>I worked on the update to the County of Summit Analysis of Impediments to Fair Housing Choice</p> <p>Property Management Training</p> <p>Read information supplied by local housing authority.</p> <p>Real Estate Association</p> <p>Reasonable Accommodation/Fair Housing and 504 Compliance Office for AMHA</p> <p>The Akron Area Board of REALTORS sponsors civil rights continuing education classes which are required of real estate licensees every three years. As an organization we're also dedicated to promoting fair housing and equal housing and coordinate activities and educational programs promoting these values.</p> <p>through job training</p> <p>through my employment situation</p> <p>Through my work and multiple trainings on the topic.</p> <p>Through trade associations such as HBA and Realtors</p> <p>When I read of government (local, county, state, federal) being able to tell the owner who they could rent or sell to.</p>

Table 3.G.11
How should fair housing laws be changed?

3. NEFCO Region
2013 Fair Housing Survey Data

Comments:
<p>According to the U.S. Constitution, every citizen is protected in the buying or leasing of housing. No laws are needed. Follow the U.S. Constitution.</p> <p>Additional protected classes</p> <p>As stated above, the laws are extremely biased toward the drags on society. The laws should be changed so that delinquent people face the choice of paying (what they already promised to pay) their rent or moving out within days not months. This would cause these people to get more responsible and serious about their lives and be a better impact on our society (and economy). The ways the laws are now, it only encourages irresponsibility.</p> <p>Expand protected classes in our community</p> <p>get rid of it. involves government at the expense of liberty. tort law has existed for centuries as remediation.</p> <p>I think source of income and sexual orientation should be federally protected classes.</p> <p>Include sexual orientation/identity</p>

Property owner should have the final say in who he does or does not rent to. Most property owners are only concerned about the color "green" and getting paid on regular basis. Laws force landlords to take renters who may not qualify financially. Property owners should be able to rent to anyone they wish.....and NOT to anyone they do not wish, without threat by the government. It's a constitutional concept called PRIVATE PROPERTY RIGHTS. They should be strengthened and the penalties made heavier, especially for municipalities and counties that receive federal funds.

Local Fair Housing

Table 3.G.12

Are there any specific geographic areas that have fair housing problems?

3. NEFCO Region
2013 Fair Housing Survey Data

Comments:
In Alliance I have known of issues. Race discrimination is still a problem in suburban areas. Discrimination against persons with disabilities is still rampant. These areas include the SE sides of town and parts of the NE and NW

Table 3.G.13

Are there any specific groups in that face housing discrimination?

3. NEFCO Region
2013 Fair Housing Survey Data

Comments:
All of the protected classes. Disabled Mental illness mentally ill Minorities and women with children Or, perhaps criminals. Persons with disabilities Race, color, disability, familial status especially. People refusing to rent or grant accommodations. The southeast side of Canton is very segregated and reserved for mainly low-income individuals. Historically in Canton, this is where the African-American community has been displaced and forced to be there.

Table 3.G.14
Please share any additional comments.

3. NEFCO Region
 2013 Fair Housing Survey Data

Comments:
<p>Comment on English. Language barrier needs to be addressed during the permitting process. Either they know English or they hire a translator (at their expense, not the counties). If you pander to their specific language during the permitting - and then turn them over to contractors that only speak English - you are setting up an opportunity for failure for both parties. Resisting to assimilate to our common language will only serve to keep that person in a limited socioeconomic class which will not serve them or the community particularly well.</p> <p>Follow the U.S. Constitution</p> <p>I encourage Fair Housing groups to continue to educate the community, advocate, and promote Fair Housing laws.</p> <p>n/a</p> <p>The concept of "Fair Housing" sounds good but flies in the face of Liberty and Private Property rights that this nation was founded on. It has gone way too far.</p> <p>This survey is obviously heavily biased. Where are the questions regarding the multitude of problems that landlords continually face?? If this survey even attempted to be even handed it might have been useful in seeing the real big picture of housing concerns - unfortunately this will end up being another biased paper and waste of tax payer money.</p>

Fair Housing in the Private Sector

Table 3.G.15
Are you aware of any questionable practices or barriers to fair housing choice in the rental housing market?

3. NEFCO Region
 2013 Fair Housing Survey Data

Comments:
<p>Difficulties faced by persons with disabilities</p> <p>Disability , accommodations</p> <p>I am aware that these things happen, but only from reporting for the agency we contract with for Fair Housing services.</p> <p>Landlords have been known to discriminate against formerly homeless individuals</p> <p>Obtaining affordable housing is a barrier to the poor and working poor.</p> <p>Persons with disabilities especially face discriminatory policies put in place by landlords and local governments. I am also aware of local landlords who prefer to deny applications from immigrants and persons on student or work visas.</p> <p>refusal to rent based on disability</p> <p>Refusal to rent to people who are affiliated with the local mental health agency (discrimination based on disability).</p> <p>Some barriers include racial make up of different communities within the immediate vicinity of Canton</p> <p>There are still people that discriminate on the basis of disability and race especially.</p> <p>There is a lack of availability of affordable housing in areas of opportunity.</p> <p>Though cases I have seen come through our office.</p> <p>We've referred callers to Fair Housing Contact Services based on alleged discrimination for renters in the area of ADA compliance and familial status.</p>

Table 3.G.16
Are you aware of any questionable practices or barriers to fair housing choice in the real estate industry?

3. NEFCO Region
 2013 Fair Housing Survey Data

Comments:
<p>I am aware that these things happen, but only from reporting for the agency we contract with for Fair Housing services.</p> <p>I know some minorities who do not feel welcomed to live in certain parts of the county.</p> <p>racial</p> <p>There are locations where the real estate agents actively work to maintain adult only communities as well as minimize the number of minority families living in the area.</p>

Table 3.G.17
Are you aware of any questionable practices or barriers to fair housing choice in the mortgage and home lending industry?

3. NEFCO Region
 2013 Fair Housing Survey Data

Comments:
<p>I am aware that these things happen, but only from reporting for the agency we contract with for Fair Housing services.</p>

More minorities are denied loans for mortgages.

Table 3.G.18

Are you aware of any questionable practices or barriers to fair housing choice in the housing construction or accessible housing design fields?

3. NEFCO Region
2013 Fair Housing Survey Data

Comments:
all over the place, inaccessibility stupid question - the federal government passed a law against that in the Reagan administration - the full employment act for attorneys. Try looking at the housing being built around the University of Akron for compliance with the building code.

Table 3.G.19

Are you aware of any questionable practices or barriers to fair housing choice in the home insurance industry?

3. NEFCO Region
2013 Fair Housing Survey Data

Comments:

Table 3.G.20

Are you aware of any questionable practices or barriers to fair housing choice in the home appraisal industry?

3. NEFCO Region
2013 Fair Housing Survey Data

Comments:
It seems that race is associated with lower neighborhood values. Perhaps, it is by coincidence that high crime rates are cited as factors creating lower values.

Table 3.G.21

Are you aware of any questionable practices or barriers to fair housing choice in any other housing services?

3. NEFCO Region
2013 Fair Housing Survey Data

Comments:
The City of Akron has reduced its housing inspection program which impacts the minority community the most.

Fair Housing in the Public Sector

Table 3.G.22

Are you aware of any questionable practices or barriers to fair housing choice in land use policies?

3. NEFCO Region
2013 Fair Housing Survey Data

Comments:
<p>and why wouldn't a community choose to do that?</p> <p>For an example of concentrating housing for persons with disabilities in locations where they will be isolated, look at the development of the Madeline Terrace (name?) being undertaken by the Community Support Services. They will be creating an apartment complex where only people with disabilities will be allowed to live, concentrating them into an area where there are few available alternatives for shopping, recreation, etc. It is all being done to reduce the cost of providing services, rather than trying to integrate people with disabilities into the wider community. It will become a modern day 'ghetto'.</p> <p>It's known as 'zoning'. It is a practice that has been in existence for a long time. I only have problems with it when the zoning gets changed for crony capitalistic reasons, or when the government, through grants, intrudes on a community.</p> <p>Some suburban communities limit densities making it next to impossible to build multi family units without getting a variance, which can be a very dicey procedure.</p>

Table 3.G.23

Are you aware of any questionable practices or barriers to fair housing choice in zoning laws?

3. NEFCO Region
2013 Fair Housing Survey Data

Comments
<p>at what point does someone else's rights supplant mine - especially in regard to property?</p> <p>It is becoming less of an issue now</p> <p>Pretty much the same at number 1</p> <p>Problems with group homes in residential communities.</p> <p>The City of Green keeps trying to limit multi-family rental housing as do other communities.</p>

Table 3.G.24

Are you aware of any questionable practices or barriers to fair housing choice in occupancy standards or health and safety codes?

3. NEFCO Region
2013 Fair Housing Survey Data

Comments:
<p>equality under the law!</p> <p>This is more a matter of selective enforcement. The City of Kent enforces their occupancy standard where they feel students might choose to live.</p>

Table 3.G.25

Are you aware of any questionable practices or barriers to fair housing choice in property tax policies?

3. NEFCO Region
2013 Fair Housing Survey Data

Comments:
<p>In this area look to where the cities choose to spend their CDBG funds. The biggest need is in the oldest sections of town, which is where the lowest level of public spending occurs. When redevelopment does occur, little attention is given to where the lowest income families will be moved to or the condition of their new housing.</p> <p>Modifications cost the private owner money and yet there are many cases where the person requesting the mods have very little disposable income</p> <p>Why?</p>

Table 3.G.26**Are you aware of any questionable practices or barriers to fair housing choice in the permitting process?**3. NEFCO Region
2013 Fair Housing Survey Data

Comments:
Ahem.....this is America. Those who come here need to assimilate. Offering alternate language documents only serves to delay this process.
Barriers are found wherever housing for persons with disabilities is being developed.
The language of business in Ohio is English. We don't ask they give up their own practices or religion, but they came to this country and I believe they should assimilate to our language at the very least.
What language house it be, Spanish? what about the French Italian or Serbian, Russian native speaker. It gets ridiculous. It becomes the responsibility of the foreign speaker to get some one that speaks English to translate it for him or her. . Why?

Table 3.G.27**Are you aware of any questionable practices or barriers to fair housing choice in housing construction standards?**3. NEFCO Region
2013 Fair Housing Survey Data

Comments:
A property owner should be able to construct housing units with a minimum of government intrusion/red tape.
There is a widespread failure to enforce the building code in all of its details.
What is your definition of accessible housing?

Table 3.G.28**Are you aware of any questionable practices or barriers to fair housing choice in neighborhood or community development policies?**3. NEFCO Region
2013 Fair Housing Survey Data

Comments:
Isn't that what zoning does - restrict property rights?
The lowest income neighborhoods, which most often have the highest concentration of persons in protected classes, get the least amount of monies spent.

Table 3.G.29**Are you aware of any barriers that limit access to government services, such as a lack of transportation or employment services?**3. NEFCO Region
2013 Fair Housing Survey Data

Comments:
At times the phones are difficult to get through on and if people work during the day, they are unable to get a hold of someone in the evening.
But those public services are all located on bus lines.
Is it your position that the government must supply transportation and employment services?
no bus routes to many outlying areas of the county

Table 3.G.30**Are you aware of any questionable practices or barriers to fair housing choice in any other public administrative actions or regulations?**3. NEFCO Region
2013 Fair Housing Survey Data

Comments:
Barberton limits where group homes can go. Not a permitted use in a residential district.
The attitudes of many elected and appointed officials tends to support those with the most money rather than trying to maintain a liveable community for everyone.

H. LAND USE PLANNING SURVEY DATA

This section contains data regarding the potential effects of local land use and housing policies on fair housing choice, as gathered from the Fair Housing Survey for Government Officials.

FAIR HOUSING SURVEY FOR GOVERNMENT OFFICIALS

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 was conducted predominately online. Respondents were solicited by mass-distributed emails sent by the NEOSCC, members of the Progress Review Team, and other various organizations in the 12-county region.

This section contains data gathered from the public sector staff in the NEFCO Region that received and completed the survey.¹¹

Table 3.H.1
Housing Development
 3. NEFCO Region
 2012 Fair Housing Survey for Government Officials Data

Question: Does your jurisdiction have...	Yes	No	Don't Know	Missing	Total
Housing Development					
Definitions for "dwelling unit" or "residential unit"?	15	1	4	9	29
Guidelines that encourage development affordable housing units?	4	11	4	10	29
Any potential barriers to the development of low- to moderate- income housing?	6	11	3	9	29
Guidelines that allow the development of mixed use housing?	12	6	1	10	29
Any potential barriers to the development of mixed use housing?	10	8	1	10	29
Occupancy Standards					
A definition for the term "family"?	12	4	3	10	29
Residential occupancy standards or limits?	7	8	4	10	29
Special Needs Housing					
A definition for the term "disability"?	6	7	5	11	29
Development standards for making housing accessible to persons with disabilities?	1	12	5	11	29
A process by which persons with disabilities can request modification to the jurisdiction's policies?	8	5	5	11	29
Standards for the development of senior housing?	2	12	4	11	29
Guidelines that distinguish senior citizen housing from other residential uses?	2	10	6	11	29
Guidelines for developing housing for any other special needs populations?	6	9	3	11	29
Fair Housing Policies					
A fair housing ordinance, policy, or regulation?	5	7	7	10	29
Policies or practices for "affirmatively furthering fair housing"?	8	6	4	11	29

I. IMPEDIMENTS

The 2013 *Northeast Ohio Regional Analysis of Impediments to Fair Housing Choice* uncovered several potential issues regarding fair housing in the NEFCO Region. Identification of these items as probable impediments to fair housing choice was based on HUD's definition of impediments as actions, omissions, or decisions that restrict housing

¹¹ For areas with both nonentitlement and entitlement communities, the results of the nonentitlement community government official survey and the entitlement community interviews were summed.

choice due to protected class status or actions, omissions, or decisions that have this effect. The identified impediments are supported by evidence uncovered during the Regional AI process, with impediments of higher need being those identified in multiple sources.

These probable impediments in the entirety of the Northeast Ohio Region are presented in **Volumes I and II** of the Regional AI. They are accompanied by suggested actions that jurisdictions in the Region may implement in order to alleviate or eliminate these impediments, and are accompanied by measurable objectives. The goal of these actions and measureable objectives is to assist these agencies in offering greater housing choice for all citizens of the Northeast Ohio Region.

The following list presents the private and public sector impediments found in the NEFCO Region.

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.

IMPEDIMENTS MATRIX

The matrix on the following page includes the impediment, data source, or sources that indicated its existence, protected classes most affected, and ranking of need for action. Level of need for action was determined based on the number of data sources that identified each impediment.

Table 3.I.1
Impediments Matrix
 3. NEFCO 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 ¹²			
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				Disabled persons	L
Public Sector													
1	Lack of sufficient fair housing policies or practices by several units of local government		X					X				All	M
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		All	M
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

¹² 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.

4. EASTGATE REGION

A. CENSUS BUREAU DATA

This section contains additional data from the U.S. Census Bureau.

Table 4.A.1
Population by Age
4. Eastgate Region
2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Under 5	35,834	6.1%	30,782	5.6%	-14.1%
5 to 19	121,835	20.8%	105,200	19.1%	-13.7%
20 to 24	31,937	5.5%	30,787	5.6%	-3.6%
25 to 34	69,779	11.9%	59,240	10.8%	-15.1%
35 to 54	173,335	29.6%	151,840	27.6%	-12.4%
55 to 64	56,461	9.6%	77,587	14.1%	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%

Table 4.A.2
Elderly Population by Age
4. Eastgate Region
2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
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%

Table 4.A.3
Population by Race and Ethnicity
4. Eastgate Region
2000 & 2010 Census SF1 Data

Race	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
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	.2%	1,092	.2%	12.2%
Asian	2,580	.4%	3,041	.6%	17.9%
Native Hawaiian/ Pacific Islander	121	.0%	114	.0%	-5.8%
Other	4,006	.7%	5,175	.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%

Table 4.A.4
Disability by Age
 4. Eastgate Region
 2010 Three-Year ACS Data

Age	Male		Female		Total	
	Disabled Population	Disability Rate	Disabled Population	Disability Rate	Disabled Population	Disability Rate
Under 5	94	.6%	103	.7%	197	.6%
5 to 17	3,538	7.5%	2,743	6.0%	6,281	6.8%
18 to 34	4,538	9.2%	3,274	6.5%	7,812	7.8%
35 to 64	16,519	15.0%	16,669	14.3%	33,188	14.6%
65 to 74	5,294	25.2%	5,962	24.3%	11,256	24.7%
75 or Older	8,362	48.6%	12,877	46.9%	21,239	47.6%
Total	38,345	14.7%	41,628	14.9%	79,973	14.8%

Table 4.A.5
Employment Status by Disability and Type: Age 18 to 64
 4. Eastgate Region
 2010 Three-Year ACS Data

Disability Status	Population
Employed:	220,740
With a disability:	12,598
With a hearing difficulty	3,333
With a vision difficulty	2,081
With a cognitive difficulty	4,102
With an ambulatory difficulty	5,237
With a self-care difficulty	1,479
With an independent living difficulty	2,677
No disability	208,142
Unemployed:	26,822
With a disability:	3,541
With a hearing difficulty	841
With a vision difficulty	474
With a cognitive difficulty	1,916
With an ambulatory difficulty	1,238
With a self-care difficulty	434
With an independent living difficulty	947
No disability	23,281
Not in labor force:	79,148
With a disability:	24,861
With a hearing difficulty	3,606
With a vision difficulty	3,094
With a cognitive difficulty	12,232
With an ambulatory difficulty	15,505
With a self-care difficulty	5,799
With an independent living difficulty	11,233
No disability	54,287
Total	326,710

Table 4.A.6
Households by Income

4. Eastgate 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	41,505	18.0%	37,381	16.7%
\$15,000 to \$19,999	17,804	7.7%	15,453	6.9%
\$20,000 to \$24,999	17,980	7.8%	15,725	7.0%
\$25,000 to \$34,999	33,202	14.4%	27,759	12.4%
\$35,000 to \$49,999	40,757	17.6%	36,216	16.1%
\$50,000 to \$74,999	44,443	19.2%	43,598	19.4%
\$75,000 to \$99,999	19,658	8.5%	23,588	10.5%
\$100,000 or More	15,698	6.8%	24,678	11.0%
Total	231,047	100.0%	224,398	100.0%

Table 4.A.7

Poverty by Age

4. Eastgate Region
2000 Census SF3 & 2010 Five-Year ACS Data

Age	2000 Census		2010 Five-Year ACS	
	Persons in Poverty	% of Total	Persons in Poverty	% of Total
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%
Total	66,278	100.0%	86,436	100.0%
Poverty Rate	11.6%	.	15.9%	.

Table 4.A.8

Households by Year Home Built

4. Eastgate Region
2000 Census SF3 & 2010 Five-Year ACS Data

Year Built	2000 Census		2010 Five-Year ACS	
	Households	% of Total	Households	% of Total
1939 or Earlier	52,665	22.8%	48,783	21.7%
1940 to 1949	25,262	10.9%	19,932	8.9%
1950 to 1959	44,458	19.2%	42,491	18.9%
1960 to 1969	33,361	14.4%	29,961	13.4%
1970 to 1979	38,250	16.6%	34,635	15.4%
1980 to 1989	15,577	6.7%	15,150	6.8%
1990 to 1999	21,431	9.3%	20,573	9.2%
2000 to 2004	.	.	9,796	4.4%
2005 or Later	.	.	3,077	1.4%
Total	231,004	100.0%	224,398	100.0%

Table 4.A.9
Housing Units by Type

4. Eastgate Region
2000 Census SF3 & 2010 Five-Year ACS Data

Unit Type	2000 Census		2010 Five-Year ACS	
	Units	% of Total	Units	% of Total
Single-Family	193,714	77.3%	199,977	78.5%
Duplex	11,526	4.6%	11,017	4.3%
Tri- or Four-Plex	8,899	3.6%	8,907	3.5%
Apartment	25,236	10.1%	24,837	9.8%
Mobile Home	11,193	4.5%	9,978	3.9%
Boat, RV, Van, Etc.	103	.0%	18	.0%
Total	250,671	100.0%	254,734	100.0%

Table 4.A.10
Housing Units by Tenure

4. Eastgate Region
2000 & 2010 Census SF1 Data

Tenure	2000 Census		2010 Census		% Change 00–10
	Units	% of Total	Units	% of Total	
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%
Total Housing Units	250,671	100.0%	254,095	100.0%	1.4%

Table 4.A.11
Disposition of Vacant Housing Units

4. Eastgate Region
2000 & 2010 Census SF1 Data

Disposition	2000 Census		2010 Census		% Change 00–10
	Units	% of Total	Units	% of Total	
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%	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%

Table 4.A.12
Households by Household Size

4. Eastgate Region
2000 & 2010 Census SF1 Data

Size	2000 Census		2010 Census		% Change 00–10
	Households	% of Total	Households	% of Total	
One Person	63,586	27.5%	67,064	29.9%	5.5%
Two Persons	77,589	33.6%	77,408	34.5%	-.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%

Table 4.A.13
Household Type by Tenure
 4. Eastgate Region
 2000 & 2010 Census SF1 Data

Household Type	2000 Census		2010 Census		% Change 00–10
	Households	% of Total	Households	% of Total	
Family Households	158,281	68.5%	146,045	65.2%	-7.7%
Married-Couple Family	118,930	75.1%	103,237	70.7%	-13.2%
Owner-Occupied	104,750	88.1%	90,883	88.0%	-13.2%
Renter-Occupied	14,180	11.9%	12,354	12.0%	-12.9%
Other Family	39,351	24.9%	42,808	29.3%	8.8%
Male Householder, No Spouse	9,290	23.6%	11,302	26.4%	21.7%
Owner-Occupied	6,306	67.9%	7,392	65.4%	17.2%
Renter-Occupied	2,984	32.1%	3,910	34.6%	31.0%
Female Householder, No Spouse	30,061	76.4%	31,506	73.6%	4.8%
Owner-Occupied	16,678	55.5%	16,075	51.0%	-3.6%
Renter-Occupied	13,383	44.5%	15,431	49.0%	15.3%
Non-Family Households	72,723	31.5%	78,041	34.8%	7.3%
Owner-Occupied	42,213	58.0%	46,007	59.0%	9.0%
Renter-Occupied	30,510	42.0%	32,034	41.0%	5.0%
Total	231,004	100.0%	224,086	100.0%	-3.0%

Table 4.A.14
Group Quarters Population
 4. Eastgate Region
 2000 & 2010 Census SF1 Data

Group Quarters Type	2000 Census		2010 Census		% Change 00-10
	Population	% of Total	Population	% of Total	
Institutionalized					
Correctional Institutions	4,326	41.2%	6,519	54.0%	50.7%
Juvenile Facilities	.	.	115	1.0%	.
Nursing Homes	5,774	55.0%	5,269	43.6%	-8.7%
Other Institutions	405	3.9%	169	1.4%	-58.3%
Total	10,505	100.0%	12,072	100.0%	14.9%
Noninstitutionalized					
College Dormitories	856	33.0%	1,283	44.8%	49.9%
Military Quarters	0	.0%	0	.0%	%
Other Noninstitutional	1,739	67.0%	1,581	55.2%	-9.1%
Total	2,595	19.8%	2,864	19.2%	10.4%
Total Group Quarters Population	13,100	100.0%	14,936	100.0%	14.0%

Table 4.A.15
Overcrowding and Severe Overcrowding
 4. Eastgate Region
 2000 Census SF3 & 2010 Five-Year ACS Data

Data Source	No Overcrowding		Overcrowding		Severe Overcrowding		Total
	Households	% of Total	Households	% of Total	Households	% of Total	
Owner							
2000 Census	168,235	99.0%	1,353	.8%	393	.2%	169,981
2010 ACS	163,017	99.2%	1,249	.8%	127	.1%	164,393
Renter							
2000 Census	59,178	97.0%	1,365	2.2%	480	.8%	61,023
2010 ACS	58,970	98.3%	700	1.2%	335	.6%	60,005
Total							
2000 Census	227,413	98.4%	2,718	1.2%	873	.4%	231,004
2010 ACS	221,987	98.9%	1,949	.9%	462	.2%	224,398

Table 4.A.16
Households with Incomplete Plumbing Facilities
 4. Eastgate Region
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Plumbing Facilities	230,002	223,481
Lacking Complete Plumbing Facilities	1,002	917
Total Households	231,004	224,398
Percent Lacking	.4%	.4%

Table 4.A.17
Households with Incomplete Kitchen Facilities
 4. Eastgate Region
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Kitchen Facilities	229,749	222,366
Lacking Complete Kitchen Facilities	1,255	2,032
Total Households	231,004	224,398
Percent Lacking	.5%	.9%

Table 4.A.18
Cost Burden and Severe Cost Burden by Tenure
 4. Eastgate Region
 2000 Census & 2010 Five-Year ACS Data

Data Source	Less Than 30%		31%-50%		Above 50%		Not Computed		Total
	Households	% of Total	Households	% of Total	Households	% of Total	Households	% of Total	
Owner With a Mortgage									
2000 Census	67,623	76.6%	13,242	15.0%	6,975	7.9%	389	.4%	88,229
2010 ACS	68,175	67.6%	19,867	19.7%	12,371	12.3%	395	.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 ACS	53,472	84.1%	6,106	9.6%	3,549	5.6%	458	.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 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 ACS	147,831	65.9%	39,254	17.5%	30,519	13.6%	6,794	3.0%	224,398

Table 4.A.19
Median Housing Costs
 4. Eastgate Region
 2000 Census SF3 & 2010 Five-Year ACS Data

Housing Cost	2000 Census	2010 ACS
Median Contract Rent	\$1,127	\$1,374
Median Home Value	\$250,500	\$319,400

B. BEA DATA

This section contains additional Bureau of Economic Analysis (BEA) data that address employment and income.

Table 4.B.1
Employment by Industry
 4. Eastgate Region
 Select Years 2001–2010 BEA Data

NAICS Categories	2001	2005	2006	2007	2008	2009	2010	% Change 01–10
Farm employment	3,439	2,943	2,906	2,909	2,738	2,758	2,741	-20.3%
Forestry, fishing, related activities, and other	125	363	436	479	496	477	488	290.4%
Mining	672	658	1,338	1,466	1,868	1,790	1,904	183.3%
Utilities	1,052	853	852	879	888	844	802	-23.8%
Construction	16,356	16,956	16,559	16,486	15,760	14,333	13,863	-15.2%
Manufacturing	49,175	41,237	39,963	35,620	34,353	26,394	28,420	-42.2%
Wholesale trade	6,198	9,484	9,427	9,478	9,819	9,016	8,524	37.5%
Retail trade	39,151	37,881	37,198	36,967	35,073	33,659	32,505	-17.0%
Transportation and warehousing	9,243	9,857	10,159	10,314	10,209	9,185	9,413	1.8%
Information	3,847	3,567	3,883	3,874	3,643	3,343	2,805	-27.1%
Finance and insurance	8,929	8,931	8,862	9,206	9,405	9,753	9,968	11.6%
Real estate and rental and leasing	8,741	9,932	9,853	9,870	9,642	9,455	9,190	5.1%
Professional and technical services	8,873	8,525	9,901	10,305	9,852	9,669	9,682	9.1%
Management of companies and enterprises	1,506	1,543	1,815	1,824	2,127	1,892	2,012	33.6%
Administrative and waste services	15,852	16,790	17,109	17,436	16,817	16,353	18,401	16.1%
Educational services	3,465	3,854	3,654	3,482	3,507	3,634	3,749	8.2%
Health care and social assistance	35,841	38,188	38,523	38,763	38,960	39,167	38,776	8.2%
Arts, entertainment, and recreation	4,245	4,384	4,235	4,198	4,272	4,119	4,170	-1.8%
Accommodation and food services	20,440	21,149	20,798	20,737	19,956	19,311	19,522	-4.5%
Other services, except public administration	16,919	16,542	16,336	16,349	16,081	15,660	15,436	-8.8%
Government and government enterprises	34,931	34,118	33,899	33,662	33,452	33,531	32,659	-6.5%
Total	294,409	289,815	287,706	284,304	278,918	264,343	265,030	-10.0%

Table 4.B.2
Real Earnings by Industry

4. Eastgate Region
 Select Years 2001–2010 BEA Data, Real 2011 Dollars

NAICS Categories	2001	2005	2006	2007	2008	2009	2010	% Change 00–10
Farm earnings	18,191	25,734	18,993	24,963	27,284	27,727	21,240	16.8%
Forestry, fishing, related activities, and other	4,524	7,799	8,100	9,053	7,628	6,316	6,267	38.5%
Mining	9,770	20,268	78,447	73,579	89,046	30,408	31,161	219.0%
Utilities	91,135	85,076	82,972	82,972	94,890	87,921	81,996	-10.0%
Construction	700,577	713,997	702,104	662,384	610,917	557,567	559,137	-20.2%
Manufacturing	3,268,826	3,024,400	3,090,549	2,755,778	2,395,239	1,768,833	1,916,248	-41.4%
Wholesale trade	350,181	545,900	557,736	575,184	625,665	558,036	529,400	51.2%
Retail trade	1,136,269	1,089,374	1,038,449	1,011,815	952,343	926,344	920,144	-19.0%
Transportation and warehousing	448,091	468,664	485,603	470,323	456,938	388,281	409,703	-8.6%
Information	178,480	169,067	175,876	185,768	173,021	156,728	123,850	-30.6%
Finance and insurance	399,204	418,558	415,007	407,175	366,280	345,323	345,128	-13.5%
Real estate and rental and leasing	209,319	168,725	152,859	125,331	145,581	157,910	143,861	-31.3%
Professional and technical services	348,332	343,330	379,022	395,099	424,738	398,123	418,548	20.2%
Management of companies and enterprises	96,076	99,320	110,884	109,920	116,439	121,840	127,268	32.5%
Administrative and waste services	361,844	428,571	442,285	445,114	435,891	433,393	492,644	36.1%
Educational services	58,014	71,761	70,369	69,167	68,823	71,897	73,912	27.4%
Health care and social assistance	1,518,909	1,692,491	1,715,331	1,684,068	1,706,115	1,726,761	1,682,001	10.7%
Arts, entertainment, and recreation	50,811	40,745	39,691	39,371	35,582	35,140	36,151	-28.9%
Accommodation and food services	330,008	352,858	342,254	353,511	346,218	343,860	365,402	10.7%
Other services, except public administration	533,763	526,767	507,022	486,304	432,114	411,787	420,824	-21.2%
Government and government enterprises	1,669,817	1,783,356	1,759,267	1,738,215	1,725,839	1,771,920	1,774,771	6.3%
Total	12,006,299	12,164,388	12,172,820	11,705,094	11,236,592	10,326,116	10,479,657	-12.7%

Table 4.B.3
Real Earnings Per Job by Industry
 4. Eastgate Region
 Select Years 2001–2010 BEA Data, 1,000's of Real 2011 Dollars

NAICS Categories	2001	2005	2006	2007	2008	2009	2010	% Change 00–10
Farm earnings	5,290	8,744	6,536	8,581	9,965	10,053	7,749	46.5%
Forestry, fishing, related activities, and other	36,195	21,486	18,578	18,899	15,378	13,242	12,842	-64.5%
Mining	14,538	30,802	58,630	50,191	47,669	16,988	16,366	12.6%
Utilities	86,631	99,738	97,386	94,393	106,858	104,172	102,239	18.0%
Construction	42,833	42,109	42,400	40,179	38,764	38,901	40,333	-5.8%
Manufacturing	66,473	73,342	77,335	77,366	69,724	67,016	67,426	1.4%
Wholesale trade	56,499	57,560	59,164	60,686	63,720	61,894	62,107	9.9%
Retail trade	29,023	28,758	27,917	27,371	27,153	27,521	28,308	-2.5%
Transportation and warehousing	48,479	47,546	47,800	45,600	44,758	42,273	43,525	-10.2%
Information	46,395	47,397	45,294	47,952	47,494	46,883	44,153	-4.8%
Finance and insurance	44,709	46,866	46,830	44,229	38,945	35,407	34,624	-22.6%
Real estate and rental and leasing	23,947	16,988	15,514	12,698	15,099	16,701	15,654	-34.6%
Professional and technical services	39,258	40,273	38,281	38,341	43,112	41,175	43,229	10.1%
Management of companies and enterprises	63,795	64,368	61,093	60,263	54,743	64,397	63,254	-.8%
Administrative and waste services	22,826	25,525	25,851	25,528	25,920	26,502	26,773	17.3%
Educational services	16,743	18,620	19,258	19,864	19,625	19,784	19,715	17.8%
Health care and social assistance	42,379	44,320	44,527	43,445	43,791	44,087	43,377	2.4%
Arts, entertainment, and recreation	11,970	9,294	9,372	9,378	8,329	8,531	8,669	-27.6%
Accommodation and food services	16,145	16,684	16,456	17,047	17,349	17,806	18,717	15.9%
Other services, except public administration	31,548	31,844	31,037	29,745	26,871	26,295	27,263	-13.6%
Government and government enterprises	47,803	52,270	51,897	51,637	51,591	52,844	54,342	13.7%
Average	40,781	41,973	42,310	41,171	40,286	39,063	39,541	-3.04%

Table 4.B.4
Total Employment and Real Personal Income
 4. Eastgate Region
 1969–2010 BEA Data, 2011 Dollars

Year	1,000s of 2011 Dollars						Per Capita Income	Total Employment	Real Average Earnings Per Job
	Earnings	Social Security Contributions	Residents Adjustments	Dividends, Interest, Rents	Transfer Payments	Personal Income			
1969	10,157,502	699,819	7,306	1,210,465	882,719	11,558,174	18,346	266,742	38,080
1970	9,817,962	668,079	26,861	1,253,403	995,269	11,425,418	17,945	263,822	37,214
1971	9,930,275	692,858	7,422	1,285,477	1,117,156	11,647,472	18,135	262,360	37,850
1972	10,555,688	773,582	-7,225	1,311,457	1,189,085	12,275,422	18,837	267,528	39,456
1973	11,583,402	983,661	-37,317	1,370,783	1,294,103	13,227,310	20,660	280,154	41,347
1974	11,484,430	1,009,072	-26,551	1,439,784	1,428,009	13,316,601	20,559	284,901	40,310
1975	10,536,853	903,830	4,839	1,428,455	1,711,332	12,777,649	20,110	269,752	39,061
1976	11,131,939	960,283	-11,046	1,456,714	1,799,462	13,416,786	21,006	272,891	40,793
1977	11,725,667	1,016,967	-8,701	1,540,270	1,765,648	14,005,918	21,868	279,665	41,928
1978	12,047,094	1,080,320	27,848	1,633,161	1,817,586	14,445,368	22,562	284,166	42,395
1979	12,154,060	1,131,413	74,232	1,734,119	1,900,840	14,731,839	23,231	286,552	42,415
1980	11,285,448	1,038,850	119,792	2,025,775	2,210,040	14,602,204	23,017	275,666	40,939
1981	10,992,107	1,084,603	117,018	2,286,795	2,215,851	14,527,168	23,119	269,784	40,744
1982	9,577,274	954,142	179,670	2,385,201	2,536,051	13,724,054	21,949	250,015	38,307
1983	9,656,211	982,972	142,541	2,504,875	2,535,230	13,855,885	22,356	247,000	39,094
1984	10,318,478	1,081,354	140,785	2,749,472	2,449,827	14,577,208	23,768	256,541	40,222
1985	10,415,650	1,114,500	138,120	2,812,985	2,524,311	14,776,566	24,269	259,710	40,105
1986	10,350,888	1,141,334	159,542	2,860,778	2,635,775	14,865,649	24,674	265,309	39,014
1987	10,280,184	1,136,504	187,010	2,728,917	2,682,664	14,742,271	24,683	269,335	38,169
1988	10,857,962	1,231,778	181,414	2,776,100	2,699,766	15,283,464	25,689	275,007	39,482
1989	11,052,319	1,274,633	197,589	2,953,010	2,784,506	15,712,791	26,459	279,548	39,536
1990	10,757,489	1,268,129	264,629	2,926,399	3,038,079	15,718,467	26,509	279,504	38,488
1991	10,677,778	1,285,274	231,847	2,901,349	3,101,683	15,627,383	26,294	279,169	38,248
1992	11,205,206	1,308,053	154,552	2,820,833	3,278,964	16,151,502	27,073	277,612	40,363
1993	11,514,496	1,369,447	98,011	2,753,689	3,314,288	16,311,038	27,297	281,836	40,855
1994	12,398,830	1,428,849	-52,900	2,844,232	3,356,902	17,118,216	28,664	287,699	43,097
1995	12,141,110	1,450,295	113,080	2,933,409	3,446,739	17,184,043	28,843	296,402	40,962
1996	11,768,939	1,437,828	281,361	3,039,930	3,497,236	17,149,639	28,836	299,162	39,340
1997	11,934,850	1,416,053	368,181	3,245,460	3,515,184	17,647,621	29,758	301,709	39,557
1998	12,152,072	1,387,389	407,794	3,408,350	3,520,871	18,101,698	30,634	304,234	39,943
1999	12,389,654	1,406,322	456,491	3,318,878	3,546,866	18,305,567	31,131	305,572	40,546
2000	12,257,782	1,344,647	549,502	3,316,542	3,658,615	18,437,795	31,533	304,346	40,276
2001	12,006,299	1,335,121	579,211	3,168,114	3,879,448	18,297,951	31,456	294,409	40,781
2002	12,165,027	1,310,378	568,187	2,956,168	4,019,648	18,398,652	31,828	289,593	42,007
2003	12,504,451	1,340,503	552,172	2,869,101	4,107,771	18,692,992	32,495	288,052	43,410
2004	12,380,887	1,370,409	570,061	2,632,977	4,157,834	18,371,349	32,117	288,310	42,943
2005	12,164,388	1,362,905	588,539	2,511,658	4,234,225	18,135,904	31,914	289,815	41,973
2006	12,172,820	1,381,300	564,681	2,691,513	4,287,468	18,335,183	32,473	287,706	42,310
2007	11,705,094	1,335,343	586,868	3,014,997	4,398,315	18,369,931	32,809	284,304	41,171
2008	11,236,592	1,317,549	631,881	3,200,206	4,654,715	18,405,846	33,129	278,918	40,286
2009	10,326,116	1,242,207	580,542	2,531,094	5,210,516	17,406,061	31,480	264,343	39,063
2010	10,479,657	1,261,428	560,438	2,544,117	5,305,697	17,628,480	32,066	265,030	39,541

C. BLS DATA

This section contains Bureau of Labor Statistics (BLS) data that address employment and income.

Table 4.C.1
Labor Force Statistics
 4. Eastgate Region
 1990–2011 BLS Data

Year	Labor Force	Employment	Unemployment	Unemployment Rate	Statewide Unemployment Rate
1990	273,702	253,456	20,246	7.4%	5.7%
1991	273,394	252,373	21,021	7.7%	6.6%
1992	278,595	251,523	27,072	9.7%	7.4%
1993	275,757	251,952	23,805	8.6%	6.7%
1994	277,964	256,020	21,944	7.9%	5.6%
1995	278,671	260,281	18,390	6.6%	4.9%
1996	277,925	259,394	18,531	6.7%	5.0%
1997	278,883	262,159	16,724	6.0%	4.6%
1998	278,765	261,417	17,348	6.2%	4.3%
1999	275,846	260,539	15,307	5.5%	4.3%
2000	278,406	264,458	13,948	5.0%	4.0%
2001	274,751	258,357	16,394	6.0%	4.4%
2002	274,930	255,583	19,347	7.0%	5.7%
2003	274,672	254,012	20,660	7.5%	6.2%
2004	274,458	254,084	20,374	7.4%	6.1%
2005	274,847	256,080	18,767	6.8%	5.9%
2006	274,402	257,132	17,270	6.3%	5.4%
2007	270,340	253,199	17,141	6.3%	5.6%
2008	268,512	248,654	19,858	7.4%	6.5%
2009	270,581	235,514	35,067	13.0%	10.1%
2010	266,720	235,348	31,372	11.8%	10.0%
2011	262,153	236,508	25,645	9.8%	8.6%

D. HMDA DATA

The Home Mortgage Disclosure Act (HMDA) requires both depository and non-depository lenders to collect and publicly disclose information about housing-related loans and loan applications.¹³ The information presented in this section presents detailed HMDA data, including denial rates and predatory lending including high annual percentage rate (APR) loans.

Table 4.D.1
Purpose of Loan by Year
4. Eastgate Region
2004–2011 HMDA Data

Purpose	2004	2005	2006	2007	2008	2009	2010	2011	Total
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
Total	52,220	54,721	48,774	35,265	23,803	22,640	20,488	18,483	276,394

Table 4.D.2
Occupancy Status for Home Purchase Loan Applications
4. Eastgate Region
2004–2011 HMDA Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	Total
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
Total	13,937	15,969	15,116	10,386	6,906	5,958	5,369	5,449	79,090

Table 4.D.3
Owner-Occupied Home Purchase Loan Applications by Loan Type
4. Eastgate Region
2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Conventional	10,692	12,811	12,261	7,822	3,416	2,359	2,171	2,204	53,736
FHA - Insured	1,464	1,127	1,067	1,153	2,437	2,603	2,318	2,226	14,395
VA - Guaranteed	239	237	170	181	245	270	256	283	1,881
Rural Housing Service or Farm Service Agency	58	47	23	43	141	329	273	316	1,230
Total	12,453	14,222	13,521	9,199	6,239	5,561	5,018	5,029	71,242

¹³ Data are considered “raw” because they contain entry errors and incomplete loan applications. Starting in 2004, the HMDA data made substantive changes in reporting. It modified the way it handled Hispanic data, loan interest rates, and the reporting of multifamily loan applications.

DENIAL RATES

Table 4.D.4
Loan Applications by Action Taken
 4. Eastgate Region
 2004–2011 HMDA Data

Action	2004	2005	2006	2007	2008	2009	2010	2011	Total
Loan Originated	7,105	7,759	6,997	5,162	3,490	2,832	2,677	2,588	38,610
Application Approved but not Accepted	932	1,108	891	538	300	179	160	154	4,262
Application Denied	1,480	1,872	2,076	1,345	853	621	595	585	9,427
Application Withdrawn by Applicant	936	1,195	826	440	291	231	193	215	4,327
File Closed for Incompleteness	177	205	204	134	59	45	34	46	904
Loan Purchased by the Institution	1,823	2,066	2,522	1,572	1,244	1,653	1,359	1,441	13,680
Preapproval Request Denied	0	17	5	8	2	0	0	0	32
Preapproval Approved but not Accepted	0	0	0	0	0	0	0	0	0
Total	12,453	14,222	13,521	9,199	6,239	5,561	5,018	5,029	71,242
Denial Rate	17.2%	19.4%	22.9%	20.7%	19.6%	18.0%	18.2%	18.4%	19.6%

Table 4.D.5
Denial Rates by Gender of Applicant
 4. Eastgate Region
 2004–2011 HMDA Data

Year	Male	Female	Not Available	Not Applicable	Average
2004	14.7%	19.4%	47.2%	.0%	17.2%
2005	17.1%	22.9%	31.7%	100.0%	19.4%
2006	20.3%	27.1%	32.1%	.0%	22.9%
2007	17.8%	24.7%	37.0%	%	20.7%
2008	18.1%	21.8%	26.4%	50.0%	19.6%
2009	17.2%	18.5%	26.6%	.0%	18.0%
2010	17.4%	18.2%	27.5%	%	18.2%
2011	17.4%	19.2%	26.3%	100.0%	18.4%
Average	17.5%	22.4%	33.2%	33.3%	19.6%

Table 4.D.6
Loan Applications by Selected Action Taken by Gender of Applicant
 4. Eastgate Region
 2004–2011 HMDA Data

Gender		2004	2005	2006	2007	2008	2009	2010	2011	Total
Male	Originated	4,999	5,292	4,706	3,525	2,318	1,838	1,785	1,756	26,219
	Denied	861	1,094	1,197	762	514	381	377	369	5,555
	Denial Rate	14.7%	17.1%	20.3%	17.8%	18.1%	17.2%	17.4%	17.4%	17.5%
Female	Originated	1,933	2,195	1,990	1,463	1,023	888	771	689	10,952
	Denied	465	651	738	481	285	202	172	164	3,158
	Denial Rate	19.4%	22.9%	27.1%	24.7%	21.8%	18.5%	18.2%	19.2%	22.4%
Not Available	Originated	172	272	298	174	148	105	121	143	1,433
	Denied	154	126	141	102	53	38	46	51	711
	Denial Rate	47.2%	31.7%	32.1%	37.0%	26.4%	26.6%	27.5%	26.3%	33.2%
Not Applicable	Originated	1	0	3	0	1	1	0	0	6
	Denied	0	1	0	0	1	0	0	1	3
	Denial Rate	.0%	100.0%	.0%	%	50.0%	.0%	%	100.0%	33.3%
Total	Originated	7,105	7,759	6,997	5,162	3,490	2,832	2,677	2,588	38,610
	Denied	1,480	1,872	2,076	1,345	853	621	595	585	9,427
	Denial Rate	17.2%	19.4%	22.9%	20.7%	19.6%	18.0%	18.2%	18.4%	19.6%

Table 4.D.7
Denial Rates by Race/Ethnicity of Applicant
 4. Eastgate Region
 2004–2011 HMDA Data

Race/Ethnicity	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	52.6%	42.9%	30.8%	27.3%	30.8%	10.0%	.0%	20.0%	30.0%
Asian	20.7%	11.1%	27.3%	20.8%	25.0%	20.7%	16.7%	33.3%	20.9%
Black	31.6%	28.3%	38.8%	32.5%	36.5%	26.3%	21.5%	33.9%	32.4%
White	14.1%	17.5%	20.1%	18.3%	17.8%	17.0%	16.9%	16.8%	17.4%
Not Available	39.4%	29.7%	36.7%	40.7%	31.5%	29.1%	32.0%	28.6%	34.3%
Not Applicable	36.4%	100.0%	.0%	%	50.0%	0.0%	0%	100.0%	36.8%
Average	17.2%	19.4%	22.9%	20.7%	19.6%	18.0%	18.2%	18.4%	19.6%
Non-Hispanic	15.2%	18.1%	21.6%	18.8%	18.9%	17.1%	16.6%	17.1%	18.2%
Hispanic	21.8%	30.3%	28.1%	32.6%	21.7%	22.2%	24.1%	34.7%	27.2%

Table 4.D.8
Loan Applications by Selected Action Taken by Race/Ethnicity of Applicant
 4. Eastgate Region
 2004–2011 HMDA Data

Race		2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Originated	9	8	9	8	9	9	10	8	70
	Denied	10	6	4	3	4	1	0	2	30
	Denial Rate	52.6%	42.9%	30.8%	27.3%	30.8%	.0%	.0%	20.0%	30.0%
Asian	Originated	46	48	40	38	12	23	20	12	239
	Denied	12	6	15	10	4	6	4	6	63
	Denial Rate	20.7%	11.1%	27.3%	20.8%	25.0%	20.7%	16.7%	33.3%	20.9%
Black	Originated	347	445	392	257	122	84	113	72	1,832
	Denied	160	176	249	124	70	30	31	37	877
	Denial Rate	31.6%	28.3%	38.8%	32.5%	36.5%	26.3%	21.5%	33.9%	32.4%
White	Originated	6,296	6,589	6,059	4,595	3,148	2,576	2,364	2,319	33,946
	Denied	1,034	1,400	1,521	1,027	683	527	480	468	7,140
	Denial Rate	14.1%	17.5%	20.1%	18.3%	17.8%	17.0%	16.9%	16.8%	17.4%
Not Available	Originated	400	669	494	264	198	139	170	177	2,511
	Denied	260	283	287	181	91	57	80	71	1,310
	Denial Rate	39.4%	29.7%	36.7%	40.7%	31.5%	29.1%	32.0%	28.6%	34.3%
Not Applicable	Originated	7	0	3	0	1	1	0	0	12
	Denied	4	1	0	0	1	0	0	1	7
	Denial Rate	39.4%	29.7%	36.7%	40.7%	31.5%	29.1%	32.0%	28.6%	36.8%
Total	Originated	7,105	7,759	6,997	5,162	3,490	2,832	2,677	2,588	38,610
	Denied	1,480	1,872	2,076	1,345	853	621	595	585	9,427
	Denial Rate	17.2%	19.4%	22.9%	20.7%	19.6%	18.0%	18.2%	18.4%	19.6%
Non-Hispanic	Originated	5,972	6,926	6,387	4,816	3,217	2,630	2,467	2,381	34,796
	Denied	1,070	1,526	1,756	1,118	750	544	492	491	7,747
	Denial Rate	15.2%	18.1%	21.6%	18.8%	18.9%	17.1%	16.6%	17.1%	18.2%
Hispanic	Originated	115	124	123	89	72	49	44	32	648
	Denied	32	54	48	43	20	14	14	17	242
	Denial Rate	21.8%	30.3%	28.1%	32.6%	21.7%	22.2%	24.1%	34.7%	27.2%

Table 4.D.9
Loan Applications by Reason for Denial
 4. Eastgate Region
 2004–2011 HMDA Data

Denial Reason	2004	2005	2006	2007	2008	2009	2010	2011	Total
Debt-to-Income Ratio	156	188	227	144	102	112	114	110	1,153
Employment History	16	29	27	24	11	15	14	18	154
Credit History	354	351	360	271	204	161	181	132	2,014
Collateral	123	128	167	109	123	105	109	89	953
Insufficient Cash	30	29	31	25	22	8	13	14	172
Unverifiable Information	37	57	57	63	30	10	12	12	278
Credit Application Incomplete	100	105	141	149	112	84	53	89	833
Mortgage Insurance Denied	1	1	4	2	4	4	4	1	21
Other	301	483	314	117	52	38	34	30	1,369
Missing	362	501	748	441	193	84	61	90	2,480
Total	1,480	1,872	2,076	1,345	853	621	595	585	9,427

Table 4.D.10
Denial Rates by Income of Applicant
 4. Eastgate Region
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	47.7%	48.6%	44.4%	45.4%	45.1%	47.1%	52.9%	62.7%	48.1%
\$15,001–\$30,000	24.1%	26.0%	32.8%	30.4%	27.9%	23.2%	21.7%	22.3%	27.0%
\$30,001–\$45,000	17.4%	19.7%	22.7%	21.2%	19.9%	16.7%	18.3%	19.3%	19.8%
\$45,001–\$60,000	14.5%	17.4%	21.7%	17.2%	19.8%	15.0%	18.4%	15.5%	17.6%
\$60,001–\$75,000	12.0%	16.4%	15.5%	15.6%	13.6%	13.5%	11.8%	17.6%	14.7%
Above \$75,000	8.3%	11.5%	12.9%	12.2%	10.9%	14.1%	10.9%	11.6%	11.4%
Data Missing	27.8%	23.6%	27.4%	26.9%	21.1%	27.9%	35.7%	41.5%	27.4%
Total	17.2%	19.4%	22.9%	20.7%	19.6%	18.0%	18.2%	18.4%	19.6%

Table 4.D.11
Denial Rates of Loans by Race/Ethnicity and Income of Applicant
 4. Eastgate Region
 2004–2011 HMDA Data

Race	<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	Above \$75K	Data Missing	Average
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%	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%	40.0%	36.8%
Average	48.1%	27.0%	19.8%	17.6%	14.7%	11.4%	27.4%	19.6%
Non-Hispanic Ethnicity	47.5%	25.6%	18.3%	16.2%	14.0%	10.8%	21.3%	18.2%
Hispanic (Ethnicity)	44.9%	35.8%	25.2%	22.1%	10.3%	14.3%	30.4%	27.2%

Table 4.D.12
Loan Applications by Reason for Denial by Race/Ethnicity of Applicant
 4. Eastgate Region
 2004–2011 HMDA Data

Denial Reason	American Indian	Asian	Black	White	Not Available	Not Applicable	Total	Hispanic (Ethnicity)
Debt-to-Income Ratio	5	9	76	951	111	1	1,153	42
Employment History	0	3	9	129	13	0	154	9
Credit History	8	13	226	1,517	249	1	2,014	61
Collateral	1	5	56	792	98	1	953	21
Insufficient Cash	0	1	10	141	20	0	172	3
Unverifiable Information	1	2	38	199	38	0	278	10
Credit Application Incomplete	3	7	66	657	98	2	833	17
Mortgage Insurance Denied	0	0	2	19	0	0	21	1
Other	3	3	176	978	208	1	1,369	30
Missing	9	20	218	1,757	475	1	2,480	48
Total	30	63	877	7,140	1,310	7	9,427	242
% Missing	30.0%	31.7%	24.9%	24.6%	36.3%	14.3%	26.3%	19.8%

Table 4.D.13
Loan Applications by Income of Applicant: Originated and Denied
 4. Eastgate Region
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Loan Originated	103	90	110	77	50	54	49	25	558
	Application Denied	94	85	88	64	41	48	55	42	517
	Denial Rate	47.7%	48.6%	44.4%	45.4%	45.1%	47.1%	52.9%	62.7%	48.1%
\$15,001–\$30,000	Loan Originated	1,397	1,464	1,289	931	629	567	494	440	7,211
	Application Denied	444	515	630	406	244	171	137	126	2,673
	Denial Rate	24.1%	26.0%	32.8%	30.4%	27.9%	23.2%	21.7%	22.3%	27.0%
\$30,001–\$45,000	Loan Originated	1,879	2,075	1,987	1,403	964	789	683	642	10,422
	Application Denied	396	509	585	378	240	158	153	154	2,573
	Denial Rate	17.4%	19.7%	22.7%	21.2%	19.9%	16.7%	18.3%	19.3%	19.8%
\$45,001–\$60,000	Loan Originated	1,414	1,623	1,342	1,029	661	539	516	533	7,657
	Application Denied	239	343	373	214	163	95	116	98	1,641
	Denial Rate	14.5%	17.4%	21.7%	17.2%	19.8%	15.0%	18.4%	15.5%	17.6%
\$60,001–\$75,000	Loan Originated	869	942	779	635	440	314	305	322	4,606
	Application Denied	118	185	143	117	69	49	41	69	791
	Denial Rate	12.0%	16.4%	15.5%	15.6%	13.6%	13.5%	11.8%	17.6%	14.7%
Above \$75,000	Loan Originated	1,243	1,390	1,334	1,019	716	538	594	602	7,436
	Application Denied	112	181	198	141	88	88	73	79	960
	Denial Rate	8.3%	11.5%	12.9%	12.2%	10.9%	14.1%	10.9%	11.6%	11.4%
Data Missing	Loan Originated	200	175	156	68	30	31	36	24	720
	Application Denied	77	54	59	25	8	12	20	17	272
	Denial Rate	27.8%	23.6%	27.4%	26.9%	21.1%	27.9%	35.7%	41.5%	27.4%
Total	Loan Originated	7,105	7,759	6,997	5,162	3,490	2,832	2,677	2,588	38,610
	Application Denied	1,480	1,872	2,076	1,345	853	621	595	585	9,427
	Denial Rate	17.2%	19.4%	22.9%	20.7%	19.6%	18.0%	18.2%	18.4%	19.6%

Table 4.D.14
Loan Applications by Income and Race/Ethnicity of Applicant: Originated and Denied
 4. Eastgate Region
 2004–2011 HMDA Data

Race		<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	> \$75K	Data Missing	Total
American Indian	Loan Originated	1	13	13	10	3	25	5	70
	Application Denied	2	10	9	2	4	2	1	30
	Denial Rate	66.7%	43.5%	40.9%	16.7%	57.1%	7.4%	16.7%	30.0%
Asian	Loan Originated	3	36	48	49	28	68	7	239
	Application Denied	2	20	17	9	4	11	0	63
	Denial Rate	40.0%	35.7%	26.2%	15.5%	12.5%	13.9%	.0%	20.9%
Black	Loan Originated	55	529	505	356	175	191	21	1,832
	Application Denied	63	326	200	137	70	70	11	877
	Denial Rate	53.4%	38.1%	28.4%	27.8%	28.6%	26.8%	34.4%	32.4%
White	Loan Originated	432	6,181	9,216	6,715	4,119	6,654	629	33,946
	Application Denied	383	2,002	1,979	1,232	611	755	178	7,140
	Denial Rate	47.0%	24.5%	17.7%	15.5%	12.9%	10.2%	22.1%	17.4%
Not Available	Loan Originated	67	451	638	524	281	495	55	2,511
	Application Denied	66	314	367	260	101	122	80	1,310
	Denial Rate	49.6%	41.0%	36.5%	33.2%	26.4%	19.8%	59.3%	34.3%
Not Applicable	Loan Originated	0	1	2	3	0	3	3	12
	Application Denied	1	1	1	1	1	0	2	7
	Denial Rate	100.0%	50.0%	33.3%	25.0%	100.0%	.0%	40.0%	36.8%
Total	Loan Originated	558	7,211	10,422	7,657	4,606	7,436	720	38,610
	Application Denied	517	2,673	2,573	1,641	791	960	272	9,427
	Denial Rate	48.1%	27.0%	19.8%	17.6%	14.7%	11.4%	27.4%	19.6%
Non-Hispanic Ethnicity	Loan Originated	459	6,456	9,414	6,910	4,172	6,747	638	34,796
	Application Denied	415	2,221	2,112	1,334	679	813	173	7,747
	Denial Rate	47.5%	25.6%	18.3%	16.2%	14.0%	10.8%	21.3%	18.2%
Hispanic (Ethnicity)	Loan Originated	27	188	172	109	70	66	16	648
	Application Denied	22	105	58	31	8	11	7	242
	Denial Rate	44.9%	35.8%	25.2%	22.1%	10.3%	14.3%	30.4%	27.2%

PREDATORY LENDING

Table 4.D.15
Originated Owner-Occupied Loans by HAL Status
 4. Eastgate Region
 2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Other	5,791	5,407	4,836	4,225	2,931	2,607	2,651	2,561	31,009
HAL	1,314	2,352	2,161	937	559	225	26	27	7,601
Total	7,105	7,759	6,997	5,162	3,490	2,832	2,677	2,588	38,610
Percent HAL	18.5%	30.3%	30.9%	18.2%	16.0%	7.9%	1.0%	1.0%	19.7%

Table 4.D.16
Loans by Loan Purpose by HAL Status
 4. Eastgate Region
 2004–2011 HMDA Data

Loan Purpose		2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	Other	5,791	5,407	4,836	4,225	2,931	2,607	2,651	2,561	31,009
	HAL	1,314	2,352	2,161	937	559	225	26	27	7,601
	Percent HAL	18.5%	30.3%	30.9%	18.2%	16.0%	7.9%	1.0%	1.0%	19.7%
Home Improvement	Other	1,268	1,398	1,536	1,355	788	485	540	519	7,889
	HAL	378	526	431	403	241	137	44	25	2,185
	Percent HAL	23.0%	27.3%	21.9%	22.9%	23.4%	22.0%	7.5%	4.6%	21.7%
Refinancing	Other	7,958	6,112	5,218	4,414	3,522	5,646	5,872	5,021	43,763
	HAL	2,533	3,296	2,978	1,504	1,016	624	54	55	12,060
	Percent HAL	24.1%	35.0%	36.3%	25.4%	22.4%	10.0%	.9%	1.1%	21.6%
Total	Other	15,017	12,917	11,590	9,994	7,241	8,738	9,063	8,101	82,661
	HAL	4,225	6,174	5,570	2,844	559	225	26	27	21,846
	Percent HAL	22.0%	32.3%	32.5%	22.2%	20.1%	10.1%	1.3%	1.3%	20.9%

Table 4.D.17
HALs Originated by Race of Borrower
 4. Eastgate Region
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	1	2	3	1	2	1	0	0	10
Asian	7	17	9	5	1	0	0	0	39
Black	139	257	254	101	24	8	1	1	785
White	986	1,689	1,657	746	490	206	25	26	5,825
Not Available	179	387	236	84	42	9	0	0	937
Not Applicable	2	0	2	0	0	1	0	0	5
Total	1,314	2,352	2,161	937	559	225	26	27	7,601
Hispanic (Ethnicity)	29	47	45	18	14	7	0	0	160

Table 4.D.18
Rate of HALs Originated by Race/Ethnicity of Borrower
 4. Eastgate Region
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	11.1%	25.0%	33.3%	12.5%	22.2%	11.1%	.0%	.0%	14.3%
Asian	15.2%	35.4%	22.5%	13.2%	8.3%	.0%	.0%	.0%	16.3%
Black	40.1%	57.8%	64.8%	39.3%	19.7%	9.5%	.9%	1.4%	42.8%
White	15.7%	25.6%	27.3%	16.2%	15.6%	8.0%	1.1%	1.1%	17.2%
Not Available	44.8%	57.8%	47.8%	31.8%	21.2%	6.5%	.0%	.0%	37.3%
Not Applicable	28.6%	%	66.7%	%	.0%	100.0%	%	%	42%
Average	18.5%	30.3%	30.9%	18.2%	16.0%	7.9%	01.0%	01.0%	19.7%
Non-Hispanic Ethnicity	17.3%	27.5%	29.6%	17.5%	15.8%	8.0%	1.0%	1.1%	18.5%
Hispanic (Ethnicity)	25.2%	37.9%	36.6%	20.2%	19.4%	14.3%	.0%	.0%	24.7%

Table 4.D.19
Loans by HAL Status by Race/Ethnicity of Borrower
 4. Eastgate Region
 2004–2011 HMDA Data

Race	Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Other	8	6	6	7	7	8	10	8	60
	HAL	1	2	3	1	2	1	0	0	10
	Percent HAL	11.1%	25.0%	33.3%	12.5%	22.2%	11.1%	.0%	.0%	14.3%
Asian	Other	39	31	31	33	11	23	20	12	200
	HAL	7	17	9	5	1	0	0	0	39
	Percent HAL	15.2%	35.4%	22.5%	13.2%	8.3%	.0%	.0%	.0%	16.3%
Black	Other	208	188	138	156	98	76	112	71	1,047
	HAL	139	257	254	101	24	8	1	1	785
	Percent HAL	40.1%	57.8%	64.8%	39.3%	19.7%	9.5%	.9%	1.4%	42.8%
White	Other	5,310	4,900	4,402	3,849	2,658	2,370	2,339	2,293	28,121
	HAL	986	1,689	1,657	746	490	206	25	26	5,825
	Percent HAL	15.7%	25.6%	27.3%	16.2%	15.6%	8.0%	01.1%	01.1%	17.2%
Not Available	Other	221	282	258	180	156	130	170	177	1,574
	HAL	179	387	236	84	42	9	0	0	937
	Percent HAL	44.8%	57.8%	47.8%	31.8%	21.2%	6.5%	.0%	.0%	37.3%
Not Applicable	Other	5	0	1	0	1	0	0	0	7
	HAL	2	0	2	0	0	1	0	0	5
	Percent HAL	28.6%	%	66.7%	%	.0%	100.0%	%	%	42.0%
Total	Other	5,791	5,407	4,836	4,225	2,931	2,607	2,651	2,561	31,009
	HAL	1,314	2,352	2,161	937	559	225	26	27	7,601
	Percent HAL	18.5%	30.3%	30.9%	18.2%	16.0%	7.9%	1.0%	1.0%	19.7%
Non-Hispanic Ethnicity	Other	4,937	5,021	4,497	3,974	2,710	2,420	2,442	2,355	28,356
	HAL	1,035	1,905	1,890	842	507	210	25	26	6,440
	Percent HAL	17.3%	27.5%	29.6%	17.5%	15.8%	8.0%	1.0%	1.1%	18.5%
Hispanic (Ethnicity)	Other	86	77	78	71	58	42	44	32	488
	HAL	29	47	45	18	14	7	0	0	160
	Percent HAL	25.2%	37.9%	36.6%	20.2%	19.4%	14.3%	.0%	.0%	24.7%

Table 4.D.20
Rates of HALs by Income of Borrower
 4. Eastgate Region
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Average
\$15,000 or Below	29.1%	35.6%	40.0%	37.7%	28.0%	14.8%	6.1%	.0%	28.7%
\$15,001–\$30,000	27.1%	41.9%	45.0%	27.0%	23.4%	10.9%	1.8%	1.8%	28.4%
\$30,001–\$45,000	21.6%	34.9%	34.6%	21.4%	20.4%	9.4%	.7%	1.2%	23.0%
\$45,001–\$60,000	18.7%	29.7%	29.7%	15.4%	13.5%	6.7%	1.2%	.6%	18.8%
\$60,001–\$75,000	12.8%	22.4%	23.4%	13.1%	12.0%	6.4%	.3%	.6%	14.4%
Above \$75,000	7.7%	17.0%	15.5%	9.0%	8.2%	4.6%	0.2%	1.0%	9.7%
Data Missing	15.0%	30.9%	39.1%	35.3%	.0%	.0%	2.8%	.0%	23.6%
Average	18.5%	30.3%	30.9%	18.2%	16.0%	7.9%	1.0%	1.0%	19.7%

Table 4.D.21
Loans by HAL Status by Income of Borrower
 4. Eastgate Region
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Other	73	58	66	48	36	46	46	25	398
	HAL	30	32	44	29	14	8	3	0	160
	Percent HAL	29.1%	35.6%	40.0%	37.7%	28.0%	14.8%	6.1%	.0%	28.7%
\$15,001–\$30,000	Other	1,019	851	709	680	482	505	485	432	5,163
	HAL	378	613	580	251	147	62	9	8	2,048
	Percent HAL	27.1%	41.9%	45.0%	27.0%	23.4%	10.9%	1.8%	1.8%	28.4%
\$30,001–\$45,000	Other	1,474	1,351	1,299	1,103	767	715	678	634	8,021
	HAL	405	724	688	300	197	74	5	8	2,401
	Percent HAL	21.6%	34.9%	34.6%	21.4%	20.4%	9.4%	.7%	1.2%	23.0%
\$45,001–\$60,000	Other	1,150	1,141	943	871	572	503	510	530	6,220
	HAL	264	482	399	158	89	36	6	3	1,437
	Percent HAL	18.7%	29.7%	29.7%	15.4%	13.5%	6.7%	1.2%	.6%	18.8%
\$60,001–\$75,000	Other	758	731	597	552	387	294	304	320	3,943
	HAL	111	211	182	83	53	20	1	2	663
	Percent HAL	12.8%	22.4%	23.4%	13.1%	12.0%	6.4%	.3%	.6%	14.4%
Above \$75,000	Other	1,147	1,154	1,127	927	657	513	593	596	6,714
	HAL	96	236	207	92	59	25	1	6	722
	Percent HAL	7.7%	17.0%	15.5%	9.0%	8.2%	4.6%	.2%	1.0%	9.7%
Data Missing	Other	170	121	95	44	30	31	35	24	550
	HAL	30	54	61	24	0	0	1	0	170
	Percent HAL	15.0%	30.9%	39.1%	35.3%	.0%	.0%	2.8%	.0%	23.6%
Total	Other	5,791	5,407	4,836	4,225	2,931	2,607	2,651	2,561	31,009
	HAL	1,314	2,352	2,161	937	559	225	26	27	7,601
	Percent HAL	18.5%	30.3%	30.9%	18.2%	16.0%	7.9%	1.0%	1.0%	19.7%

E. CRA DATA

Additional data tables related to Community Reinvestment Act (CRA) data are presented in this section.

Table 4.E.1
Small Business Loans Originated: \$100,000 or Less by Tract MFI
 4. Eastgate Region
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	472	1,062	3,377	2,722		7,633
2001	495	1,296	3,869	2,849		8,509
2002	528	1,551	4,713	3,338		10,130
2003	425	1,618	5,992	3,004		11,039
2004	323	1,358	6,468	2,914		11,063
2005	291	1,242	6,758	2,949		11,240
2006	376	1,501	8,147	3,915		13,939
2007	369	1,623	9,137	4,356		15,485
2008	277	1,164	6,498	3,260		11,199
2009	136	499	2,759	1,498		4,892
2010	149	483	2,604	1,411		4,647
2011	158	591	3,283	1,665		5,697
Total	3,999	13,988	63,605	33,881	0	115,473
Loan Amount (\$1,000s)						
2000	6,038	14,747	47,029	39,606		107,420
2001	5,368	14,365	47,169	36,799		103,701
2002	6,779	15,420	46,825	38,612		107,636
2003	4,965	16,661	58,722	29,585		109,933
2004	3,689	13,892	62,903	28,251		108,735
2005	3,581	13,194	71,859	34,397		123,031
2006	3,577	15,227	82,976	37,976		139,756
2007	3,706	16,139	86,532	45,552		151,929
2008	2,611	11,150	58,193	30,391		102,345
2009	2,199	7,645	36,185	18,841		64,870
2010	2,607	9,141	41,970	24,084		77,802
2011	3,057	9,968	49,125	26,288		88,438
Total	48,177	157,549	689,488	390,382	0	1,285,596

Table 4.E.2
Small Business Loans Originated: \$100,001 to \$250,000 by Tract MFI
 4. Eastgate Region
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	27	54	146	160		387
2001	26	61	182	174		443
2002	26	72	171	193		462
2003	13	52	216	146		427
2004	14	51	238	129		432
2005	9	75	219	142		445
2006	20	47	204	105		376
2007	11	50	204	121		386
2008	14	32	121	76		243
2009	18	44	143	67		272
2010	8	47	157	87		299
2011	18	42	188	109		357
Total	204	627	2,189	1,509	0	4,529
Loan Amount (\$1,000s)						
2000	4,480	8,423	25,258	27,629		65,790
2001	4,559	10,349	30,642	31,265		76,815
2002	4,219	11,689	29,511	32,814		78,233
2003	2,096	9,036	36,057	25,749		72,938
2004	2,452	9,081	41,817	22,276		75,626
2005	1,607	13,186	37,927	24,695		77,415
2006	3,732	8,528	34,292	18,282		64,834
2007	1,860	8,389	34,783	20,984		66,016
2008	2,520	5,548	21,736	12,952		42,756
2009	3,300	7,995	24,958	11,322		47,575
2010	1,569	8,963	27,805	15,815		54,152
2011	3,252	7,762	32,601	19,125		62,740
Total	35,646	108,949	377,387	262,908	0	784,890

Table 4.E.3
Small Business Loans Originated: More than \$250,000 by Tract MFI
 4. Eastgate Region
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	20	25	124	130		299
2001	32	33	134	186		385
2002	24	36	144	201		405
2003	18	60	194	118		390
2004	13	55	226	123		417
2005	12	59	191	117		379
2006	13	44	179	112		348
2007	6	45	140	116		307
2008	6	41	110	92		249
2009	9	44	144	99		296
2010	25	50	155	107		337
2011	12	64	185	106		367
Total	190	556	1,926	1,507	0	4,179
Loan Amount (\$1,000s)						
2000	12,183	11,106	62,058	66,554		151,901
2001	16,293	17,231	66,713	95,080		195,317
2002	11,751	19,319	70,265	100,116		201,451
2003	8,757	33,044	98,367	58,853		199,021
2004	6,343	29,327	112,615	65,709		213,994
2005	6,748	32,781	99,023	61,172		199,724
2006	6,556	25,177	95,583	55,756		183,072
2007	3,140	23,061	74,866	56,350		157,417
2008	3,850	21,947	56,875	43,898		126,570
2009	5,044	23,986	76,400	52,180		157,610
2010	12,777	27,626	82,451	50,598		173,452
2011	6,034	35,952	102,101	55,023		199,110
Total	99,476	300,557	997,317	761,289	0	2,158,639

Table 4.E.4
Small Business Loans to Businesses with Gross Annual Revenues of Less Than
\$1 Million by Tract MFI
 4. Eastgate Region
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	136	457	1,483	1,215		3,291
2001	191	508	1,656	1,382		3,737
2002	115	421	1,261	1,151		2,948
2003	130	502	2,029	1,092		3,753
2004	96	404	2,080	1,000		3,580
2005	107	563	3,123	1,357		5,150
2006	112	536	3,297	1,465		5,410
2007	102	612	3,572	1,620		5,906
2008	70	348	2,230	1,055		3,703
2009	30	192	1,051	493		1,766
2010	50	216	1,078	570		1,914
2011	59	276	1,550	803		2,688
Total	1,198	5,035	24,410	13,203	0	43,846
Loan Amount (\$1,000s)						
2000	6,777	17,257	59,999	63,984		148,017
2001	6,738	16,393	70,751	90,752		184,634
2002	8,566	24,068	71,333	89,756		193,723
2003	8,655	17,870	92,121	54,103		172,749
2004	5,509	15,616	79,564	56,435		157,124
2005	4,727	17,471	90,762	55,416		168,376
2006	3,931	16,518	88,557	58,267		167,273
2007	2,360	14,242	72,280	53,066		141,948
2008	2,108	7,703	44,217	36,572		90,600
2009	649	8,754	38,834	33,119		81,356
2010	2,368	12,904	46,057	29,160		90,489
2011	3,517	9,943	53,531	35,711		102,702
Total	55,905	178,739	808,006	656,341	0	1,698,991

F. COMPLAINT DATA

This section contains data regarding fair housing complaints, as provided by the U.S. Department of Housing and Urban Development (HUD), the Ohio Civil Rights Commission (OCRC), the Fair Housing Contact Service (FHCS), and the Fair Housing Resource Center (FHRC).

HUD COMPLAINTS

Table 4.F.1
Fair Housing Complaints by Basis
 4. Eastgate Region
 2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color		1			3	1		1		6
Disability	8	3	8	12	15	4	7	9	8	74
Family Status	1	2	3	4	3	5	3	1	2	24
National Origin					1	1			1	3
Race	5	5	5	7	4	8	4	7	5	50
Religion	1		1		2			1	1	6
Sex				3		3		1		7
Total Bases	15	11	17	26	28	22	14	20	17	170
Total Complaints	13	9	15	23	22	18	12	18	12	142

Table 4.F.2
Fair Housing Complaints by Issue
 4. Eastgate Region
 2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Discriminatory refusal to sell				1	1				1	3
Discriminatory refusal to negotiate for sale						1				1
Discriminatory refusal to rent			2		7	6	2		1	21
Discriminatory refusal to negotiate for rental								1		1
Discriminatory refusal to rent and negotiate for rental				3	1		2	2	1	9
Discriminatory advertising, statements, and notices				2	6	2	3	2	1	16
Discriminatory advertisement - rental			2		1	3		1		7
False denial or representation of availability	1						1			2
False denial or representation of availability - sale									1	1
False denial or representation of availability - rental					1	1	1		1	4
Discriminatory financing (includes real estate transactions)					1		1	1		3
Discrimination in the terms or conditions for making loans							1			1
Discrimination in the selling of residential real property					1					1
Discriminatory terms, conditions, privileges, or services and facilities	1	2	4	1	3	1		6	5	23
Discrimination in terms, conditions, privileges relating to sale									1	1
Discrimination in terms, conditions or privileges relating to rental	5	3	6	3	5	5	7	3		37
Discrimination in services and facilities relating to rental					1	1	1	2	2	7
Steering							1			1
Otherwise deny or make housing available	1	1					1	5	1	9
Other discriminatory acts		1			1			1	1	4
Discriminatory acts under Section 818 (coercion, etc.)		2	1	2				1	2	8
Using ordinances to discriminate in zoning and land use						1		1		2
Non-compliance with design and construction requirements (handicap)									1	1
Failure to provide an accessible building entrance		1								1
Failure to provide usable doors	1									1
Failure to permit reasonable modification				1						1
Failure to make reasonable accommodation	5	3	4	4	5	2	1	5	4	33
Total Issues	16	13	18	24	32	19	20	32	25	199
Total Complaints	13	9	15	23	22	18	12	18	12	142

Table 4.F.3
Fair Housing Complaints by Closure Status
 4. Eastgate Region
 2004–2012 HUD Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Administrative Closure Cause (FHAP)	1	1	3	3		8	5	4	1	26
Conciliated / Settled			1	2	10		2	4		19
No Cause	6	4	5	13	7	4	4	6	2	51
Open	6	4	6	5	5	6	1	4	1	38
									8	8
Total Complaints	13	9	15	23	22	18	12	18	12	142

HUD Complaints Found With Cause

Table 4.F.4
Fair Housing Complaints Found With Cause by Basis
 4. Eastgate Region
 2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color		1								1
Disability	5	2	4	10	14	2	6	7	2	52
Family Status		1	2	3	3		2	1		12
Race	2	2	1	2		1		1		9
Sex				1		2				3
Total Bases	7	6	7	16	17	5	8	9	2	77
Total Complaints	6	4	6	15	17	4	6	10	2	70

Table 4.F.5
Fair Housing Complaints Found With Cause by Issue
 4. Eastgate Region
 2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Discriminatory refusal to sell				1						1
Discriminatory refusal to rent			2		3	6	1			12
Discriminatory refusal to rent and negotiate for rental					1	1		1		3
Discriminatory advertising, statements, and notices					2	6	1	1		10
Discriminatory advertisement - rental				2					1	3
False denial or representation of availability	1									1
False denial or representation of availability - rental							1			1
Discriminatory financing (includes real estate transactions)								1		1
Discriminatory terms, conditions, privileges, or services and facilities	1	1	2	1	3			3		11
Discrimination in terms, conditions or privileges relating to rental		1	1	2	3		4	1		12
Discrimination in services and facilities relating to rental					1	1	1	2	1	6
Otherwise deny or make housing available	1	1						3		5
Other discriminatory acts								1		1
Discriminatory acts under Section 818 (coercion, etc.)		1	1	1						3
Non-compliance with design and construction requirements (handicap)									1	1
Failure to provide an accessible building entrance		1								1
Failure to provide usable doors	1									1
Failure to permit reasonable modification				1						1
Failure to make reasonable accommodation	3	2	2	4	5	1	1	5	1	24
Total Issues	9	7	8	16	25	4	8	18	3	98
Total Complaints	6	4	6	15	17	4	6	10	2	70

OHIO CIVIL RIGHTS COMMISSION COMPLAINTS

Table 4.F.6
Fair Housing Complaints by Basis
 4. Eastgate Region
 2004–2012 OCRC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Age	1									1
Color				1	1	3		1		6
Disability	6	2	9	10	12	6	6	7	2	60
Family Status			3	6	1	1	2	1		14
Gender		1	1	3		2	1	1		9
National Origin						2				2
Race	9	2	6	7	12	3	3	8	2	54
Religion	1			1	2			1		5
Retaliation		3		3	1		1	1	1	10
Total Bases	17	8	19	31	22	26	13	20	5	161
Total Complaints	13	4	16	25	16	19	11	14	4	122

Table 4.F.7
Fair Housing Complaints by Issue
 4. Eastgate Region
 2004–2012 OCRC Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Advertising			1	1						2
Discharge				1						1
Exclusion					5					5
Harassment	1		1	2						4
Intimidation				2	3	2			2	9
Other	4	2	1	10	3	8	3	5	1	37
Reasonable Accommodation	4		5	3	7	2	3	3	1	28
Sexual Harassment						1				1
Terms and Conditions	4	2	12	14	4	8	6	8	2	60
Total Issues	13	4	20	33	22	21	12	16	6	147
Total Complaints	13	4	16	25	16	19	11	14	4	122

Table 4.F.8
Fair Housing Complaints by Closure Status
 4. Eastgate Region
 2004–2012 OCRC Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
CP Failed to Cooperate			2	3		3	2	3		13
CP Withdrawal – No Benefit				2			2		1	5
No Cause Finding Issued	7	3	8	6	4	8	2	5	1	44
No Jurisdiction						1			1	2
Settlement With Benefits	3		4	7	6	3	3	4		30
Successful Conciliation			1		4	1	1			7
Withdrawal With Benefits	2	1	1	7	2	3	1	2	1	20
Missing	1									1
Total Complaints	13	4	16	25	16	19	11	14	4	122

FAIR HOUSING CONTACT SERVICE COMPLAINTS

Table 4.F.9
Fair Housing Complaints by Basis
4. Eastgate Region
2004–2012 FHCS Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color					2					2
Disability			1	1	4	1			8	15
Familial Status					8			1		9
Race					3	1				4
Other					1				1	2
Unknown				1						1
Total Bases	0	0	1	2	18	2	0	1	9	33
Total Complaints			1	2	13	2		1	9	28

Table 4.F.10
Fair Housing Complaints by Closure Status
4. Eastgate Region
2004–2012 FHCS Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Closed				1	3	2				6
Elected not to pursue									1	1
Inquiry					1				3	4
Lack of jurisdiction					6					6
No contact									1	1
No probable cause				1	1				1	3
Pending			1						2	3
Probable cause								1		1
Reasonable accommodation granted									1	1
Withdrawal of Charge					2					2
Total Complaints	0	0	1	2	13	2	0	1	9	28

FAIR HOUSING RESOURCE CENTER COMPLAINTS

Table 4.F.11
Fair Housing Complaints by Basis
4. Eastgate Region
2004– 2012 FHRC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability					2	2	1	1		6
Family Status									1	1
Race			1			1				2
Other	1			2			1	1		5
Total Bases	1	0	1	2	2	3	2	2	1	14
Total Complaints	1		1	2	2	3	2	2	1	14

Table 4.F.12
Fair Housing Complaints by Issue Type
4. Eastgate Region
2004– 2012 FHRC Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Rental	1		1	2	2	3	2	2	1	14
Total	1	0	1	2	2	3	2	2	1	14

Table 4.F.13
Fair Housing Complaints by Closure Status
 4. Eastgate Region
 2004–2012 FHRC Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Settled through counseling	1		1	2	2	3		2	1	12
Complaint filed in federal court										38
Reasonable Accommodation Granted							2			2
Total	1	0	1	2	2	3	2	2	1	14

G. FAIR HOUSING SURVEY FOR HOUSING STAKEHOLDERS DATA

This section presents public involvement data gathered through the 2012–2013 Fair Housing Survey for Housing Stakeholders.

Table 4.G.1
Primary Role of Respondent
 4. Eastgate Region
 2012–2013 Fair Housing Survey for Housing
 Stakeholders Data

Primary Role	Total
Real Estate	17
Advocate/Service Provider	9
Local Government	5
Construction/Development	4
Property Management	4
Resident Advisory Council Leader	3
Condo or Homeowner Association Leader	2
Law/Legal Services	1
Other Role	9
Total	54

FEDERAL, STATE, AND LOCAL LAWS

Table 4.G.2
**Familiarity with Fair
 Housing Laws**

4. Eastgate Region
 2012–2013 Fair Housing Survey
 for Housing Stakeholders Data

Familiarity	Total
Not Familiar	6
Somewhat Familiar	15
Very Familiar	18
Missing	15
Total	54

Table 4.G.3
Perceptions About Fair Housing Laws

4. Eastgate 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?	37	3	1	13	54
Are fair housing laws difficult to understand or follow?	11	23	7	13	54
Do you think fair housing laws should be changed?	6	20	14	14	54
Do you think fair housing laws are adequately enforced?	24	14	2	14	54

Table 4.G.4
Fair Housing Activities

4. Eastgate 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?		24	14	2	14	54
Have you participated in fair housing training?		24	2		28	54
Are you aware of any fair housing testing?		8	18	14	14	54
Testing and education	Too Little	Right Amount	Too Much	Don't Know	Missing	Total
Is there sufficient outreach and education activity?	16	8	1	15	14	54
Is there sufficient testing?	5	2	1	32	14	54

Table 4.G.5
Protected Classes

4. Eastgate Region
2012–2013 Fair Housing Survey
for Housing Stakeholders Data

Protected Class	Total
Family Status	18
Religion	20
Gender	17
National Origin	11
Color	10
Sexual Orientation	6
Age	10
Military	7
Disability	4
Ancestry	6
Ethnicity	2
Race	2
Other	5
Total	118

Table 4.G.6
Fair Housing Violation Referrals
 4. Eastgate Region

2012–2013 Fair Housing Survey for Housing Stakeholders Data

Referral	Total
Ashtabula County Fair Housing Office	1
Board of Realtors	1
City	1
County	2
Don't Know	3
Greater Warren-Youngstown Urban League	3
HUD	10
Lawyer	2
Legal Aid	3
OCRC	2
Ohio Division of Real Estate and Professional Licensing	2
Other	4
Youngstown Human Relations Commission	6
Total	40

LOCAL FAIR HOUSING

Table 4.G.7
Local Fair Housing
 4. Eastgate 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?	11	15	9	19	54
Are there any specific geographic areas that have fair housing problems?	5	7	21	21	54
Are there any specific groups in that face housing discrimination?	10	7	17	20	54

FAIR HOUSING IN THE PRIVATE SECTOR

Table 4.G.8
Barriers to Fair Housing in the Private Sector
 4. Eastgate Region

2012–2013 Fair Housing Survey for Housing Stakeholders Data

Question	Yes	No	Don't Know	Missing	Total
Are you aware of any questionable practices or barriers to fair housing choice in:					
The rental housing market?	8	21	8	17	54
The real estate industry?	4	24	9	17	54
The mortgage and home lending industry?	8	17	12	17	54
The housing construction or accessible housing design fields?	4	18	15	17	54
The home insurance industry?	5	18	14	17	54
The home appraisal industry?	2	19	16	17	54
Any other housing services?	1	19	15	19	54

FAIR HOUSING IN THE PUBLIC SECTOR

Table 4.G.9
Barriers to Fair Housing in the Public Sector
 4. Eastgate Region
 2012–2013 Fair Housing Survey for Housing Stakeholders Data

Question	Yes	No	Don't Know	Missing	Total
Are you aware of any questionable practices or barriers to fair housing choice in:					
Land use policies?	5	22	8	19	54
Zoning laws?	6	16	12	20	54
Occupancy standards or health and safety codes?	4	15	16	19	54
Property tax policies?	6	14	16	18	54
Permitting process?	1	16	19	18	54
Housing construction standards?	2	15	19	18	54
Neighborhood or community development policies?	7	17	12	18	54
Limited access to government services, such as employment services?	11	18	7	18	54
Public administrative actions or regulations?	1	16	17	20	54

NARRATIVE COMMENTS

Federal, State, and Local Laws

Table 4.G.10
How did you become aware of fair housing laws?
 4. Eastgate Region
 2013 Fair Housing Survey Data

Comments:
25 years in HUD rental programs Been doing this for over 30 years dealing with HUD and ODOA, now ODSA< education Generally through my work. I am a housing advocate and present trainings on Fair Housing. I am a Real Estate broker I am part of the Trumbull Housing Collaborative and I am a homeless outreach worker In the past I was a landlord; also, I have been asked by a number of international students to intervene in tenant/landlord disputes. Ongoing education Our agency participates on the local Housing Collaborative. personal experiences Real estate agent/Broker for the last 30 years real estate classes, trainings, etc.. Real Estate Investors Assoc education Real estate law Real estate license and continuing education classes. realtors must always go to classes Retired city planner in Warren. Through real estate Through trainings for Housing Counselors under HUD. Throughout my career as a Real Estate Agent the education and updates keep us aware of fair housing laws. Was a Realtor for over 15 years With events at association on Fair Housing Work on a housing services board.

Table 4.G.11
How should fair housing laws be changed?

4. Eastgate Region
 2013 Fair Housing Survey Data

Comments:
<p>criminal background checks, all offenses should not bar you from living in decent housing, landlords should be responsible to affordable and decent housing,</p> <p>Familial status because sometimes a landlord should have the option to rent certain units to certain size families.</p> <p>Have inspectors to go and find out if the laws are being upheld. The Urban League has done it in the past.</p> <p>I should be able to rent my property to anyone i want to. It is my property and I want someone that will take care of it.</p> <p>Need to include sexual orientation Those reentering Income</p> <p>Think laws should be updated to reflex issues and concern revelant to a changing conditions.</p>

Local Fair Housing

Table 4.G.12
Are there any specific geographic areas that have fair housing problems?

4. Eastgate Region
 2013 Fair Housing Survey Data

Comments:
<p>north side</p> <p>Summer wind development. And barnstone development.</p> <p>The third ward. The rich class has very few medium housing rentals if any at all.</p> <p>The urban centers of Youngstown and Warren have too few safe and affordable housing options.</p> <p>yes, limits need to be placed on rental units. they are priced at above 45% of the average household income.</p>

Table 4.G.13
Are there any specific groups in that face housing discrimination?

4. Eastgate Region
 2013 Fair Housing Survey Data

Comments:
<p>disabled</p> <p>Homeless and very low income trying to get in subsidized housing. It takes 6 to8 weeks to pass screening by then I lost touch with those waiting for housing. Entire process is too long, yet there are a plenty of empty units at the high rise in warren sitting empty.</p> <p>Individuals with mental illness and those who have a criminal background</p> <p>low income, convicted felons, other than registered sex offenders</p> <p>Racial and ethnic minorities.</p> <p>racial minorities, low income households, special needs populations</p> <p>Senior citizens..... who rent from RDW (a rental landlord). They are being assessed more rent money if they try to have say 2 seniors who want to rent a 2 bedroom or loft apartment from this landlord, location in question is Boardman, in the Huntington Woods area apartments. This owner is forever ripping these people off with some nickel and dime charges for everything and anything he can come up wit, monthly and yearly, on lease renwals you name it. This is not fair or right.</p> <p>The black and Indian community from my earlier examples.</p> <p>They are disparate impact issues. Housing not in neighborhoods, but rather across from industrial site.</p> <p>unemployed out of work - no rentals or not enough</p>

Table 4.G.14
Please share any additional comments.

4. Eastgate Region
 2013 Fair Housing Survey Data

Comments:
<p>Howard Hanna real estate company agents that work in Canfield discriminate often.</p> <p>see box 3 above.</p>

Fair Housing in the Private Sector

Table 4.G.15

Are you aware of any questionable practices or barriers to fair housing choice in the rental housing market?

4. Eastgate Region

2013 Fair Housing Survey Data

Comments:
<p>A person with an Indian accent could not rent a place but when he called back and changed his voice he was offered to see the place.</p> <p>Canfield Ohio does not accept people of color</p> <p>color</p> <p>Have heard from various senior friends that they feel they are being charged more for rent so they won't choose to live in certain apartment communities, charging more if say two sisters decide to split the rent and live together to help keep their rental expense down.</p> <p>Landlords who don't want black tenants. I work with HIV positive persons and know people who've been kicked out when the landlord found out.</p> <p>rather than answer each of these separately, let me simply state that I have a general sense that practices negatively impacting fair housing continue to be practiced, though less frequently, and less blatantly, than in the past. I believe the practices are now more likely to be informal.</p> <p>There are sexual orientation, religious, and ethnicity barriers.</p> <p>Unknown.</p> <p>When employed we referred to the proper organizations and if they were politically connected we would be directed NOT to do it..</p>

Table 4.G.16

Are you aware of any questionable practices or barriers to fair housing choice in the real estate industry?

4. Eastgate Region

2013 Fair Housing Survey Data

Comments:
<p>A coworker said she decided to change her name from an ethnic one to a more common one so she could go through the process of looking at and buying a home. Her decision was based on her experience of not getting calls back from people in the home buying process in the area in the past.</p> <p>Again race plays a part. I only "know" this anecdotally.</p> <p>All too common practice even today.</p> <p>See above answer in block number 1.</p>

Table 4.G.17

Are you aware of any questionable practices or barriers to fair housing choice in the mortgage and home lending industry?

4. Eastgate Region

2013 Fair Housing Survey Data

Comments:
<p>I personally have visited several banks and was basically turned away with before they even took my application. They gave me the "ive been doing this for years and you probably dont qualify"</p> <p>People of color have difficulty obtaining loans. Part of that is based on neighborhoods.</p> <p>Persons of color higher rates. I am a single woman with an 800 credit score currently refinancing and was given a quote of over 1% higher from the bank's mortgage dept than I'd been quoted by two different branch staff. When I pointed it out, suddenly that lower rate was in fact available.</p> <p>Probable to minorities or others with large families.</p> <p>see above story.</p> <p>Taking advantage of the elderly. This was before the Predatory Lending penalties were issued. Hopefully, it's better now. However, there are still greedy folks out there.</p>

Table 4.G.18

Are you aware of any questionable practices or barriers to fair housing choice in the housing construction or accessible housing design fields?

4. Eastgate Region
2013 Fair Housing Survey Data

Comments:
Enforcement, Enforcement, Enforcement. Handicapped accessibility is required by law. I understand a Canfield new housing development would not permit any section 8 in there (summer wind development). I understand they want no people of color Sometimes the building code doesn't work. Sometimes there are NIMBYS that have too much influence.

Table 4.G.19

Are you aware of any questionable practices or barriers to fair housing choice in the home insurance industry?

4. Eastgate Region
2013 Fair Housing Survey Data

Comments:
many of the families we work with have inadequate or no home owners insurance. We work exclusively with low income home owners. The refusal to insure homes near abandoned properties has a disparate impact on people of color.

Table 4.G.20

Are you aware of any questionable practices or barriers to fair housing choice in the home appraisal industry?

4. Eastgate Region
2013 Fair Housing Survey Data

Comments:
But, I would assume there is.

Table 4.G.21

Are you aware of any questionable practices or barriers to fair housing choice in any other housing services?

4. Eastgate Region
2013 Fair Housing Survey Data

Comments:
Crappy, unsafe, substandard rental units and rental houses for the poor. If the lenders don't want you to have a home they will tell you that the value does not meet the price.

Fair Housing in the Public Sector

Table 4.G.22

Are you aware of any questionable practices or barriers to fair housing choice in land use policies?

4. Eastgate Region
?
Eastgate Region
2013 Fair Housing Survey Data

Comments:
big lot zoning, NIMBY concerning affordable housing Low-income housing is concentrated in areas bordering industrial sites. Violent NIMBIS have been the rule in the past and present. There have been marches currently in 2012 in Warren against elderly housing units. Youngstown is currently updating their zoning code but the current code limits these types of uses in specific zoned areas.

Table 4.G.23**Are you aware of any questionable practices or barriers to fair housing choice in zoning laws?**

4. Eastgate Region
2013 Fair Housing Survey Data

Comments:
<p>Around Wick Park, a commercial owner asked me to help her find a suitable location for a purposed group home looking to locate to an adjacent corner room her office. Told her no, will not help her now that I know what she was up too. Against the law for me and I walked. And, this person is an attorney and major landlord of many inferior homes in Youngstown. She builds home on a variety of grants and takes advantage of manipulating the public when she sells these homes or charges out rent to the low income tenants. Bad news here!</p> <p>Inadequate.</p> <p>Laws not followed in Canfield.</p> <p>Religious community for whom I work are being challenged for wanting to build moderate income apartments in their motherhouse, despite the fact that the residences in question sit on land the community used to own. When they tried to build a senior apt bldg years ago locals had the land declared wet lands, then the developer that wanted to put high end homes on it got it reversed.</p> <p>Same as above for multifamily housing.</p> <p>Zoning and Spacing requirements limit the placement of group homes</p>

Table 4.G.24**Are you aware of any questionable practices or barriers to fair housing choice in occupancy standards or health and safety codes?**

4. Eastgate Region
2013 Fair Housing Survey Data

Comments:
<p>Code enforcement rarely occurs here</p> <p>Codes have not been enforced in low-income neighborhoods for years. It is getting better.</p> <p>Probably decades out of date.</p> <p>See box 2 above.</p> <p>The community that I live in is not immigrant but low income and high poverty and the homes are not up to code and codes are not enforced. Health department does not enforce violations</p>

Table 4.G.25**Are you aware of any questionable practices or barriers to fair housing choice in property tax policies?**

4. Eastgate Region
2013 Fair Housing Survey Data

Comments:
<p>City of Youngstown, especially around the YSU and Wick Park areas.</p> <p>Lack of tax incentives for making home improvements</p> <p>Republicans have run Ohio for too long to update them.</p> <p>Septic</p>

Table 4.G.26**Are you aware of any questionable practices or barriers to fair housing choice in the permitting process?**

4. Eastgate Region
2013 Fair Housing Survey Data

Comments:
<p>Warren probably does not do it. They are required to have an interpreter on call.</p>

Table 4.G.27**Are you aware of any questionable practices or barriers to fair housing choice in housing construction standards?**

4. Eastgate Region
2013 Fair Housing Survey Data

Comments:
<p>But sometimes, the permitting agencies don't know the standards thoroughly.</p> <p>Septic?</p> <p>State and National Building codes, probably a versions behind.</p>

Table 4.G.28**Are you aware of any questionable practices or barriers to fair housing choice in neighborhood or community development policies?**

4. Eastgate Region
2013 Fair Housing Survey Data

Comments:
<p>a great deal of money is devoted to projects in so called "targeted development".</p> <p>Canfield does not permit low Income housing</p> <p>City of Youngstown, especailly the YSU and Wick Park areas, and the Wick Neighbors Association, they want everything torn down if they don't like existing commercial bldg's next to reisidential locations, even if the out of town owner has the bldg on the market ot sell.</p> <p>Community Development in our area, is very shady and secretive about their work, you can not get a straight forward answer from them? the program has not benefited the community at all, the head of two nonprofit organizations that handle the HUD money is the same person, and he gets paid by both of them, the the housing program is a failure, and I think they should be investigated, due to past problems with mismanagement of money.</p> <p>Low-inome housing is not near to transportation or jobs creating a disparate impact on people of color and females.</p> <p>The local government does not encourage development that is real and applicable to this area. Developers have a difficult time with so much red tape and lack of incentives.</p> <p>We have a master plan, but there is no implementation taken due to the person running the position at present.</p>

Table 4.G.29**Are you aware of any barriers that limit access to government services, such as a lack of transportation or employment services?**

4. Eastgate Region
2013 Fair Housing Survey Data

Comments:
<p>lack of transportation lack of employment services lack of employment opportunities</p> <p>limited times that the buses run.</p> <p>Public transportation is limited</p> <p>Public transportation options poor.</p> <p>There is currently no form of public transportation in our county.</p> <p>transportation</p> <p>We only have a limited transportation system from the county. It is not enough to serve the needs of the community.</p> <p>Yes we do not have a public transit system, and most jobs are outside of the city in the rural area, limited transportation is a major problem for our area. Looking for ways to reinstate the public transit, the system that we have in place is not economic sound and does not benefit enough people for cost</p> <p>Yes, there is a huge lack of public transportation.</p> <p>Youngstown recently cut back on bus service due to budget cuts.</p>

Table 4.G.30**Are you aware of any questionable practices or barriers to fair housing choice in any other public administrative actions or regulations?**

4. Eastgate Region
2013 Fair Housing Survey Data

Comments:
<p>Canfield zoning Canfield trustees Canfield residents</p> <p>High rental rates are far too high for a town as Warren with hundreds of vacant rental units.</p>

H. LAND USE PLANNING SURVEY DATA

This section contains data regarding the potential effects of local land use and housing policies on fair housing choice, as gathered from the Fair Housing Survey for Government Officials.

FAIR HOUSING SURVEY FOR GOVERNMENT OFFICIALS

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 was conducted predominately online. Respondents were solicited by mass-distributed

emails sent by the NEOSCC, members of the Progress Review Team, and other various organizations in the 12-county region.

This section contains data gathered from the sector staff in the Eastgate Region that received and completed the survey.¹⁴

Table 4.H.1
Housing Development
 4. Eastgate Region
 2012 Fair Housing Survey for Government Officials Data

Question: Does your jurisdiction have...	Yes	No	Don't Know	Missing	Total
Housing Development					
Definitions for "dwelling unit" or "residential unit"?	22	9	12	38	81
Guidelines that encourage development affordable housing units?	5	29	9	38	81
Any potential barriers to the development of low- to moderate- income housing?	15	22	7	37	81
Guidelines that allow the development of mixed use housing?	18	11	12	40	81
Any potential barriers to the development of mixed use housing?	12	14	15	40	81
Occupancy Standards					
A definition for the term "family"?	13	17	13	38	81
Residential occupancy standards or limits?	9	19	13	40	81
Special Needs Housing					
A definition for the term "disability"?	4	20	13	44	81
Development standards for making housing accessible to persons with disabilities?	8	16	12	45	81
A process by which persons with disabilities can request modification to the jurisdiction's policies?	8	14	15	44	81
Standards for the development of senior housing?	5	21	11	44	81
Guidelines that distinguish senior citizen housing from other residential uses?	3	22	12	44	81
Guidelines for developing housing for any other special needs populations?	4	20	13	44	81
Fair Housing Policies					
A fair housing ordinance, policy, or regulation?	7	15	13	46	81
Policies or practices for "affirmatively furthering fair housing"?	7	15	12	47	81

¹⁴ For areas with both nonentitlement and entitlement communities, the results of the nonentitlement community government official survey and the entitlement community interviews were summed.

I. IMPEDIMENTS

The *2013 Northeast Ohio Regional Analysis of Impediments to Fair Housing Choice* uncovered several potential issues regarding fair housing in the Eastgate Region. Identification of these items as probable impediments to fair housing choice was based on HUD's definition of impediments as actions, omissions, or decisions that restrict housing choice due to protected class status or actions, omissions, or decisions that have this effect. The identified impediments are supported by evidence uncovered during the Regional AI process, with impediments of higher need being those identified in multiple sources.

These probable impediments in the entirety of the Northeast Ohio Region are presented in **Volumes I and II** of the Regional AI. They are accompanied by suggested actions that jurisdictions in the Region may implement in order to alleviate or eliminate these impediments, and are accompanied by measurable objectives. The goal of these actions and measureable objectives is to assist these agencies in offering greater housing choice for all citizens of the Northeast Ohio Region.

The following list presents the private and public sector impediments found in the Eastgate Region.

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.

IMPEDIMENTS MATRIX

The matrix on the following page includes the impediment, data source, or sources that indicated its existence, protected classes most affected, and ranking of need for action. Level of need for action was determined based on the number of data sources that identified each impediment.

Table 4.I.1
Impediments Matrix
 4. Eastgate 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 ¹⁵		
Private Sector												
1	Denial of available housing units in the rental markets		X				X	X			Black and Hispanic persons	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			Disabled persons	L
Public Sector												
1	Lack of sufficient fair housing policies or practices by several units of local government							X			All	L
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	All	M
5	Decisions regarding definitions of "family," "dwelling unit," and related terms									X	Disabled persons, families	L
6	Lack of inclusionary policies							X		X	All	M

¹⁵ 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.

5. AKRON HOUSING MARKET AREA

A. CENSUS BUREAU DATA

This section contains additional data from the U.S. Census Bureau.

Table 5.A.1

Population by Age

5. Akron Housing Market Area
2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Under 5	45,299	6.5%	39,714	5.6%	-12.3%
5 to 19	147,376	21.2%	140,897	20.0%	-4.4%
20 to 24	45,609	6.6%	51,192	7.3%	12.2%
25 to 34	92,041	13.2%	82,263	11.7%	-10.6%
35 to 54	210,697	30.3%	197,929	28.1%	-6.1%
55 to 64	60,678	8.7%	91,418	13.0%	50.7%
65 or Older	93,260	13.4%	99,787	14.2%	7.0%
Total	694,960	100.0%	703,200	100.0%	1.2%

Table 5.A.2

Elderly Population by Age

5. Akron Housing Market Area
2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
65 to 66	9,914	10.6%	12,224	12.3%	23.3%
67 to 69	14,608	15.7%	16,656	16.7%	14.0%
70 to 74	24,543	26.3%	22,223	22.3%	-9.5%
75 to 79	20,812	22.3%	18,342	18.4%	-11.9%
80 to 84	13,035	14.0%	15,713	15.7%	20.5%
85 or Older	10,348	11.1%	14,629	14.7%	41.4%
Total	93,260	100.0%	99,787	100.0%	7.0%

Table 5.A.3

Population by Race and Ethnicity

5. Akron Housing Market Area
2000 & 2010 Census SF1 Data

Race	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
White	596,881	85.9%	585,423	83.3%	-1.9%
Black	76,448	11.0%	84,807	12.1%	10.9%
American Indian	1,363	.2%	1,311	.2%	-3.8%
Asian	8,887	1.3%	14,190	2.0%	59.7%
Native Hawaiian/ Pacific Islander	120	.0%	173	.0%	44.2%
Other	1,918	.3%	3,015	.4%	57.2%
Two or More Races	9,343	1.3%	14,281	2.0%	52.9%
Total	694,960	100.0%	703,200	100.0%	1.2%
Non-Hispanic	689,086	99.2	692,467	98.5%	.5%
Hispanic	5,874	.8%	10,733	1.5%	82.7%

Table 5.A.4**Disability by Age**5. Akron Housing Market Area
2010 Three-Year ACS Data

Age	Male		Female		Total	
	Disabled Population	Disability Rate	Disabled Population	Disability Rate	Disabled Population	Disability Rate
Under 5	0	.0%	64	.3%	64	.2%
5 to 17	4,532	7.5%	2,258	3.9%	6,790	5.7%
18 to 34	4,675	6.1%	4,215	5.4%	8,890	5.7%
35 to 64	16,297	11.6%	17,517	11.8%	33,814	11.7%
65 to 74	5,865	25.9%	6,727	24.7%	12,592	25.3%
75 or Older	8,606	48.4%	13,923	50.2%	22,529	49.5%
Total	39,975	11.8%	44,704	12.4%	84,679	12.2%

Table 5.A.5**Employment Status by Disability and Type: Age 18 to 64**5. Akron Housing Market Area
2010 Three-Year ACS Data

Disability Status	Population
Employed:	321,429
With a disability:	14,999
With a hearing difficulty	4,755
With a vision difficulty	1,978
With a cognitive difficulty	4,471
With an ambulatory difficulty	5,861
With a self-care difficulty	1,864
With an independent living difficulty	3,507
No disability	306,430
Unemployed:	35,754
With a disability:	4,594
With a hearing difficulty	736
With a vision difficulty	672
With a cognitive difficulty	2,503
With an ambulatory difficulty	1,464
With a self-care difficulty	588
With an independent living difficulty	1,295
No disability	31,160
Not in labor force:	85,660
With a disability:	23,111
With a hearing difficulty	3,015
With a vision difficulty	3,297
With a cognitive difficulty	10,778
With an ambulatory difficulty	14,241
With a self-care difficulty	6,169
With an independent living difficulty	12,201
No disability	62,549
Total	442,843

Table 5.A.6**Households by Income**

5. Akron Housing Market Area

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	40,364	14.7%	40,487	14.2%
\$15,000 to \$19,999	16,568	6.0%	15,136	5.3%
\$20,000 to \$24,999	18,164	6.6%	15,646	5.5%
\$25,000 to \$34,999	36,126	13.2%	31,513	11.1%
\$35,000 to \$49,999	46,309	16.9%	43,617	15.3%
\$50,000 to \$74,999	57,311	20.9%	54,387	19.1%
\$75,000 to \$99,999	29,204	10.6%	35,182	12.3%
\$100,000 or More	30,234	11.0%	48,973	17.2%
Total	274,280	100.0%	284,941	100.0%

Table 5.A.7**Poverty by Age**

5. Akron Housing Market Area

2000 Census SF3 & 2010 Five-Year ACS Data

Age	2000 Census		2010 Five-Year ACS	
	Persons in Poverty	% of Total	Persons in Poverty	% of Total
Under 6	8,665	13.1%	11,642	12.4%
6 to 17	14,103	21.2%	18,620	19.8%
18 to 64	37,733	56.8%	57,157	60.7%
65 or Older	5,885	8.9%	6,794	7.2%
Total	66,386	100.0%	94,213	100.0%
Poverty Rate	9.8%	.	13.7%	.

Table 5.A.8**Households by Year Home Built**

5. Akron Housing Market Area

2000 Census SF3 & 2010 Five-Year ACS Data

Year Built	2000 Census		2010 Five-Year ACS	
	Households	% of Total	Households	% of Total
1939 or Earlier	56,414	20.6%	53,585	18.8%
1940 to 1949	26,418	9.6%	20,904	7.3%
1950 to 1959	47,326	17.3%	46,634	16.4%
1960 to 1969	42,334	15.4%	37,564	13.2%
1970 to 1979	40,557	14.8%	39,633	13.9%
1980 to 1989	24,278	8.9%	25,057	8.8%
1990 to 1999	36,910	13.5%	35,522	12.5%
2000 to 2004	.	.	18,589	6.5%
2005 or Later	.	.	7,453	2.6%
Total	274,237	100.0%	284,941	100.0%

Table 5.A.9**Housing Units by Type**5. Akron Housing Market Area
2000 Census SF3 & 2010 Five-Year ACS Data

Unit Type	2000 Census		2010 Five-Year ACS	
	Units	% of Total	Units	% of Total
Single-Family	215,040	73.9%	234,411	75.3%
Duplex	15,439	5.3%	13,934	4.5%
Tri- or Four-Plex	11,001	3.8%	10,879	3.5%
Apartment	41,400	14.2%	44,930	14.4%
Mobile Home	8,039	2.8%	7,008	2.3%
Boat, RV, Van, Etc.	57	.0%	12	.0%
Total	290,976	100.0%	311,174	100.0%

Table 5.A.10**Housing Units by Tenure**5. Akron Housing Market Area
2000 & 2010 Census SF1 Data

Tenure	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
Occupied Housing Units	274,237	94.2%	285,003	91.2%	3.9%
Owner-Occupied	193,216	70.5%	194,613	68.3%	.7%
Renter-Occupied	81,021	29.5%	90,390	31.7%	11.6%
Vacant Housing Units	16,739	5.8%	27,578	8.8%	64.8%
Total Housing Units	290,976	100.0%	312,581	100.0%	7.4%

Table 5.A.11**Disposition of Vacant Housing Units**5. Akron Housing Market Area
2000 & 2010 Census SF1 Data

Disposition	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
For Rent	6,895	41.2%	9,746	35.3%	41.3%
For Sale	2,832	16.9%	4,683	17.0%	65.4%
Rented or Sold, Not Occupied	1,764	10.5%	1,510	5.5%	-14.4%
For Seasonal, Recreational, or Occasional Use	1,601	9.6%	1,876	6.8%	17.2%
For Migrant Workers	10	0.1%	2	.0%	-80.0%
Other Vacant	3,637	21.7%	9,761	35.4%	168.4%
Total	16,739	100.0%	27,578	100.0%	64.8%

Table 5.A.12**Households by Household Size**5. Akron Housing Market Area
2000 & 2010 Census SF1 Data

Size	2000 Census		2010 Census		% Change 00-10
	Households	% of Total	Households	% of Total	
One Person	74,064	27.0%	82,728	29.0%	11.7%
Two Persons	93,385	34.1%	98,325	34.5%	5.3%
Three Persons	44,838	16.4%	44,889	15.8%	.1%
Four Persons	38,158	13.9%	35,818	12.6%	-6.1%
Five Persons	16,308	5.9%	15,551	5.5%	-4.6%
Six Persons	5,163	1.9%	5,195	1.8%	.6%
Seven Persons or More	2,321	.8%	2,497	.9%	7.6%
Total	274,237	100.0%	285,003	100.0%	3.9%

Table 5.A.13
Household Type by Tenure
 5. Akron Housing Market Area
 2000 & 2010 Census SF1 Data

Household Type	2000 Census		2010 Census		% Change 00–10
	Households	% of Total	Households	% of Total	
Family Households	183,802	67.0%	181,867	63.8%	-1.1%
Married-Couple Family	140,571	76.5%	131,999	72.6%	-6.1%
Owner-Occupied	122,704	87.3%	115,528	87.5%	-5.8%
Renter-Occupied	17,867	12.7%	16,471	12.5%	-7.8%
Other Family	43,231	23.5%	49,868	27.4%	15.4%
Male Householder, No Spouse	9,980	23.1%	12,799	25.7%	28.2%
Owner-Occupied	6,341	63.5%	7,578	59.2%	19.5%
Renter-Occupied	3,639	36.5%	5,221	40.8%	43.5%
Female Householder, No Spouse	33,251	76.9%	37,069	74.3%	11.5%
Owner-Occupied	17,173	51.6%	17,720	47.8%	3.2%
Renter-Occupied	16,078	48.4%	19,349	52.2%	20.3%
Non-Family Households	90,435	33.0%	103,136	36.2%	14.0%
Owner-Occupied	46,998	52.0%	53,787	52.2%	14.4%
Renter-Occupied	43,437	48.0%	49,349	47.8%	13.6%
Total	274,237	100.0%	285,003	100.0%	3.9%

Table 5.A.14
Group Quarters Population
 5. Akron Housing Market Area
 2000 & 2010 Census SF1 Data

Group Quarters Type	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Institutionalized					
Correctional Institutions	1,314	19.2%	1,226	21.2%	-6.7%
Juvenile Facilities	.	.	103	1.8%	.
Nursing Homes	4,838	70.8%	4,270	73.8%	-11.7%
Other Institutions	685	10.0%	185	3.2%	-73.0%
Total	6,837	100.0%	5,784	100.0%	-15.4%
Noninstitutionalized					
College Dormitories	7,847	79.6%	9,366	77.4%	19.4%
Military Quarters	0	.0%	0	.0%	%
Other Noninstitutional	2,012	20.4%	2,731	22.6%	35.7%
Total	9,859	59.1%	12,097	67.7%	22.7%
Total Group Quarters Population	16,696	100.0%	17,881	100.0%	7.1%

Table 5.A.15
Overcrowding and Severe Overcrowding
 5. Akron Housing Market Area
 2000 Census SF3 & 2010 Five-Year ACS Data

2000 Census GPO & 2010 Five Year ACS Data							
Data Source	No Overcrowding		Overcrowding		Severe Overcrowding		Total
	Households	% of Total	Households	% of Total	Households	% of Total	
Owner							
2000 Census	191,837	99.3%	1,127	.6%	257	.1%	193,221
2010 ACS	196,872	99.5%	743	.4%	150	.1%	197,765
Renter							
2000 Census	78,726	97.2%	1,540	1.9%	750	.9%	81,016
2010 ACS	85,655	98.3%	1,227	1.4%	294	.3%	87,176
Total							
2000 Census	270,563	98.7%	2,667	1.0%	1,007	.4%	274,237
2010 ACS	282,527	99.2%	1,970	.7%	444	.2%	284,941

Table 5.A.16
Households with Incomplete Plumbing Facilities
 5. Akron Housing Market Area
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Plumbing Facilities	273,352	283,996
Lacking Complete Plumbing Facilities	885	945
Total Households	274,237	284,941
Percent Lacking	.3%	.3%

Table 5.A.17
Households with Incomplete Kitchen Facilities
 5. Akron Housing Market Area
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Kitchen Facilities	272,868	282,916
Lacking Complete Kitchen Facilities	1,369	2,025
Total Households	274,237	284,941
Percent Lacking	.5%	.7%

Table 5.A.18
Cost Burden and Severe Cost Burden by Tenure
 5. Akron Housing Market Area
 2000 Census & 2010 Five-Year ACS Data

2000 Census & 2010 Five-Year ACS Data									
Data Source	Less Than 30%		31%-50%		Above 50%		Not Computed		Total
	Households	% of Total	Households	% of Total	Households	% of Total	Households	% of Total	
Owner With a Mortgage									
2000 Census	93,273	76.1%	19,911	16.2%	9,094	7.4%	368	.3%	122,646
2010 ACS	93,554	67.5%	29,295	21.1%	15,356	11.1%	373	.3%	138,578
Owner Without a Mortgage									
2000 Census	45,864	89.5%	3,065	6.0%	1,703	3.3%	640	1.2%	51,272
2010 ACS	48,608	82.1%	6,200	10.5%	3,879	6.6%	500	.8%	59,187
Renter									
2000 Census	46,282	57.6%	15,545	19.3%	13,700	17.0%	4,882	6.1%	80,409
2010 ACS	39,662	45.5%	18,861	21.6%	22,353	25.6%	6,300	7.2%	87,176
Total									
2000 Census	185,419	72.9%	38,521	15.1%	24,497	9.6%	5,890	2.3%	254,327
2010 ACS	181,824	63.8%	54,356	19.1%	41,588	14.6%	7,173	2.5%	284,941

Table 5.A.19
Median Housing Costs
 5. Akron Housing Market Area
 2000 Census SF3 & 2010 Five-Year ACS Data

Housing Cost	2000 Census	2010 ACS
Median Contract Rent	\$925	\$1,193
Median Home Value	\$232,100	\$298,300

B. BEA DATA

This section contains additional Bureau of Economic Analysis (BEA) data that address employment and income.

Table 5.B.1
Employment by Industry
 5. Akron Housing Market Area
 Select Years 2001–2010 BEA Data

NAICS Categories	2001	2005	2006	2007	2008	2009	2010	% Change 01–10
Farm employment	1,576	1,375	1,364	1,372	1,275	1,291	1,279	-18.8%
Forestry, fishing, related activities, and other	(D) ¹⁶	195	325	333	367	333	336	%
Mining	437	562	1,253	1,341	1,509	1,522	1,533	250.8%
Utilities	2,025	1,230	1,264	1,327	1,304	1,309	1,194	-41.0%
Construction	20,767	21,587	22,223	21,835	20,586	18,997	18,116	-12.8%
Manufacturing	53,810	50,024	49,467	49,194	46,461	39,713	39,154	-27.2%
Wholesale trade	18,090	18,831	19,265	19,648	19,316	18,247	18,428	1.9%
Retail trade	46,518	46,541	46,133	46,368	45,914	42,362	41,994	-9.7%
Transportation and warehousing	10,326	12,530	11,165	13,125	10,825	10,042	9,836	-4.7%
Information	5,792	5,489	5,638	5,709	5,568	5,306	5,031	-13.1%
Finance and insurance	14,082	14,791	14,729	15,040	15,680	16,526	16,969	20.5%
Real estate and rental and leasing	12,673	14,587	14,342	14,142	13,761	13,545	13,376	5.5%
Professional and technical services	19,777	21,429	22,390	23,490	23,961	22,990	23,009	16.3%
Management of companies and enterprises	9,664	14,019	14,253	14,014	15,527	14,775	14,391	48.9%
Administrative and waste services	23,290	25,803	28,080	28,813	28,802	25,597	26,219	12.6%
Educational services	5,441	6,950	7,045	6,930	7,121	7,227	7,502	37.9%
Health care and social assistance	39,979	44,555	45,854	47,708	49,592	50,253	50,847	27.2%
Arts, entertainment, and recreation	7,872	8,318	8,362	8,534	8,315	8,160	8,043	2.2%
Accommodation and food services	26,251	27,934	27,700	27,894	27,746	26,813	27,010	2.9%
Other services, except public administration	21,189	21,747	21,589	21,733	21,827	21,312	20,925	-1.2%
Government and government enterprises	50,395	50,834	50,837	52,045	53,164	52,964	52,148	3.5%
Total	392,623	410,073	415,061	420,595	420,524	401,124	399,241	1.7%

¹⁶ (D): These data are not shown to avoid disclosure of confidential information, but estimates are included in the totals.

Table 5.B.2
Real Earnings by Industry
 5. Akron Housing Market Area
 Select Years 2001–2010 BEA Data, Real 2011 Dollars

NAICS Categories	2001	2005	2006	2007	2008	2009	2010	% Change 00–10
Farm earnings	10,984	14,093	7,226	9,373	11,154	14,184	7,997	-27.2%
Forestry, fishing, related activities, and other	(D) ¹⁷	4,156	5,798	5,114	3,932	3,111	3,050	%
Mining	15,240	29,857	85,774	80,694	74,133	38,774	38,943	155.5%
Utilities	177,659	161,630	155,033	154,796	169,735	169,482	146,099	-17.8%
Construction	1,118,410	1,071,573	1,136,619	1,048,894	971,123	872,392	867,819	-22.4%
Manufacturing	3,493,822	3,505,836	3,473,445	3,378,713	3,323,741	2,858,139	3,157,329	-9.6%
Wholesale trade	1,188,408	1,371,420	1,430,371	1,456,189	1,443,713	1,276,860	1,319,470	11.0%
Retail trade	1,436,324	1,478,849	1,425,135	1,403,128	1,364,831	1,231,082	1,249,412	-13.0%
Transportation and warehousing	592,562	690,074	597,608	675,663	582,759	497,798	510,703	-13.8%
Information	324,653	325,490	337,993	332,062	313,995	300,145	278,200	-14.3%
Finance and insurance	883,751	838,136	879,097	820,897	744,470	776,768	778,909	-11.9%
Real estate and rental and leasing	259,161	257,099	232,386	192,487	237,895	264,232	251,638	-2.9%
Professional and technical services	972,143	1,154,789	1,223,623	1,254,435	1,355,877	1,296,338	1,344,078	38.3%
Management of companies and enterprises	916,032	1,356,163	1,389,820	1,525,398	1,618,546	1,519,849	1,611,785	76.0%
Administrative and waste services	640,824	692,768	766,554	838,696	900,567	855,126	856,737	33.7%
Educational services	126,122	161,321	170,540	168,963	179,113	181,238	185,661	47.2%
Health care and social assistance	2,007,817	2,229,715	2,265,899	2,310,574	2,463,729	2,494,850	2,527,100	25.9%
Arts, entertainment, and recreation	166,905	144,998	147,866	138,453	113,846	108,199	105,021	-37.1%
Accommodation and food services	469,316	477,416	468,918	490,553	476,541	465,124	489,465	4.3%
Other services, except public administration	644,165	652,373	632,677	639,464	635,771	618,996	626,098	-2.8%
Government and government enterprises	2,615,405	2,860,095	2,765,921	2,762,284	2,830,407	2,912,760	2,903,881	11.0%
Total	18,177,446	19,529,745	19,678,059	19,686,830	19,901,285	18,832,840	19,341,301	6.4%

¹⁷ (D): These data are not shown to avoid disclosure of confidential information, but estimates are included in the totals.

Table 5.B.3
Real Earnings Per Job by Industry
 5. Akron Housing Market Area
 Select Years 2001–2010 BEA Data, 1,000's of Real 2011 Dollars

NAICS Categories	2001	2005	2006	2007	2008	2009	2010	% Change 00–10
Farm earnings	6,970	10,249	5,297	6,832	8,748	10,987	6,253	-10.3%
Forestry, fishing, related activities, and other	(D) ¹⁸	21,312	17,840	15,357	10,713	9,341	9,077	%
Mining	34,874	53,126	68,455	60,175	49,127	25,476	25,403	-27.2%
Utilities	87,733	131,407	122,653	116,651	130,165	129,474	122,361	39.5%
Construction	53,855	49,640	51,146	48,037	47,174	45,923	47,903	-11.1%
Manufacturing	64,929	70,083	70,217	68,681	71,538	71,970	80,639	24.2%
Wholesale trade	65,694	72,828	74,247	74,114	74,742	69,976	71,601	9.0%
Retail trade	30,877	31,775	30,892	30,261	29,726	29,061	29,752	-3.6%
Transportation and warehousing	57,385	55,074	53,525	51,479	53,835	49,572	51,922	-9.5%
Information	56,052	59,299	59,949	58,165	56,393	56,567	55,297	-1.3%
Finance and insurance	62,758	56,665	59,685	54,581	47,479	47,003	45,902	-26.9%
Real estate and rental and leasing	20,450	17,625	16,203	13,611	17,288	19,508	18,813	-8.0%
Professional and technical services	49,155	53,889	54,650	53,403	56,587	56,387	58,415	18.8%
Management of companies and enterprises	94,788	96,737	97,511	108,848	104,241	102,866	112,000	18.2%
Administrative and waste services	27,515	26,848	27,299	29,108	31,267	33,407	32,676	18.8%
Educational services	23,180	23,212	24,207	24,381	25,153	25,078	24,748	6.8%
Health care and social assistance	50,222	50,044	49,416	48,432	49,680	49,646	49,700	-1.0%
Arts, entertainment, and recreation	21,202	17,432	17,683	16,224	13,692	13,260	13,057	-38.4%
Accommodation and food services	17,878	17,091	16,928	17,586	17,175	17,347	18,122	1.4%
Other services, except public administration	30,401	29,998	29,306	29,424	29,128	29,044	29,921	-1.6%
Government and government enterprises	51,898	56,263	54,408	53,075	53,239	54,995	55,685	7.3%
Average	46,297	47,625	47,410	46,807	47,325	46,950	48,445	4.64%

¹⁸ (D): These data are not shown to avoid disclosure of confidential information, but estimates are included in the totals.

Table 5.B.4
Total Employment and Real Personal Income
 5. Akron Housing Market Area
 1969–2010 BEA Data, 2011 Dollars

Year	1,000s of 2011 Dollars						Per Capita Income	Total Employment	Real Average Earnings Per Job
	Earnings	Social Security Contributions	Residents Adjustments	Dividends, Interest, Rents	Transfer Payments	Personal Income			
1969	11,089,284	766,985	537,895	1,506,394	868,264	13,234,851	19,572	280,847	39,485
1970	10,918,707	738,933	415,199	1,555,125	966,750	13,116,848	19,316	279,931	39,005
1971	10,837,598	753,069	406,607	1,590,168	1,078,722	13,160,026	19,375	274,958	39,415
1972	11,427,297	839,829	409,030	1,623,579	1,154,171	13,774,248	20,345	283,207	40,350
1973	11,913,215	1,010,777	471,200	1,661,636	1,282,676	14,317,950	21,174	292,971	40,663
1974	11,721,819	1,022,724	502,922	1,720,756	1,398,806	14,321,580	21,366	296,332	39,556
1975	10,869,656	912,271	529,534	1,675,729	1,671,321	13,833,970	20,560	285,325	38,096
1976	11,068,319	944,057	654,037	1,696,757	1,688,932	14,163,988	21,206	284,907	38,849
1977	11,825,311	1,013,879	753,665	1,774,235	1,630,235	14,969,566	22,605	297,537	39,744
1978	12,263,616	1,088,779	861,883	1,871,305	1,625,796	15,533,821	23,589	305,459	40,148
1979	12,324,306	1,137,917	933,506	1,977,795	1,702,721	15,800,411	23,927	307,763	40,045
1980	11,876,630	1,086,575	944,499	2,218,584	1,958,184	15,911,322	24,096	300,754	39,490
1981	11,657,156	1,142,281	922,117	2,510,839	1,990,779	15,938,611	24,191	297,681	39,160
1982	11,152,283	1,101,576	846,566	2,682,287	2,131,935	15,711,494	23,946	289,691	38,497
1983	11,268,611	1,139,039	805,932	2,812,459	2,206,575	15,954,538	24,397	285,981	39,403
1984	11,837,777	1,227,826	858,403	3,075,614	2,189,196	16,733,163	25,668	296,150	39,972
1985	12,110,409	1,275,847	883,641	3,184,035	2,273,185	17,175,424	26,487	303,855	39,856
1986	12,444,670	1,348,654	845,542	3,238,382	2,350,176	17,530,116	27,109	308,919	40,285
1987	12,711,890	1,377,555	870,850	3,214,453	2,402,206	17,821,845	27,511	316,920	40,111
1988	13,123,603	1,464,206	903,293	3,309,644	2,451,963	18,324,297	28,070	325,266	40,347
1989	13,499,630	1,522,324	941,501	3,700,707	2,549,445	19,168,959	29,238	333,052	40,533
1990	13,574,711	1,561,896	979,077	3,676,654	2,759,200	19,427,746	29,496	337,124	40,266
1991	13,531,713	1,589,658	945,150	3,592,240	2,822,573	19,302,018	29,048	337,813	40,057
1992	14,145,704	1,662,878	956,632	3,596,697	3,023,125	20,059,281	29,950	341,070	41,474
1993	14,616,919	1,734,984	896,066	3,580,220	3,116,760	20,474,980	30,373	350,680	41,682
1994	15,226,353	1,835,338	969,754	3,784,702	3,205,038	21,350,509	31,488	364,299	41,796
1995	15,640,637	1,898,110	1,006,213	4,074,913	3,339,860	22,163,513	32,491	374,193	41,798
1996	16,131,265	1,945,186	1,039,758	4,194,150	3,391,609	22,811,596	33,192	380,965	42,343
1997	16,603,155	1,946,903	1,180,292	4,495,591	3,445,336	23,777,471	34,487	387,561	42,840
1998	17,523,676	1,985,253	1,339,960	4,814,885	3,452,904	25,146,172	36,389	386,713	45,314
1999	17,913,397	2,006,526	1,650,427	4,655,020	3,508,791	25,721,109	37,109	394,182	45,444
2000	18,404,531	1,984,217	1,767,081	4,834,320	3,659,344	26,681,060	38,338	396,898	46,371
2001	18,177,446	1,936,206	1,632,816	4,396,629	3,899,966	26,170,651	37,488	392,623	46,297
2002	18,588,270	1,932,810	1,453,201	4,041,853	4,093,700	26,244,214	37,517	393,033	47,294
2003	19,116,071	1,997,495	1,403,516	3,965,735	4,195,684	26,683,512	38,057	394,628	48,441
2004	19,463,116	2,087,287	1,408,131	3,704,869	4,259,647	26,748,476	38,114	402,254	48,385
2005	19,529,745	2,103,307	1,296,767	3,818,914	4,340,801	26,882,921	38,268	410,073	47,625
2006	19,678,059	2,143,119	1,286,408	4,169,738	4,455,112	27,446,198	39,073	415,061	47,410
2007	19,686,830	2,152,979	1,186,364	4,574,769	4,606,806	27,901,790	39,666	420,595	46,807
2008	19,901,285	2,219,616	1,001,731	4,766,778	4,867,362	28,317,540	40,264	420,524	47,325
2009	18,832,840	2,131,068	984,421	3,830,858	5,472,849	26,989,900	38,373	401,124	46,950
2010	19,341,301	2,154,932	1,051,011	3,865,071	5,658,282	27,760,732	39,496	399,241	48,445

C. BLS DATA

This section contains Bureau of Labor Statistics (BLS) data that address employment and income.

Table 5.C.1
Labor Force Statistics
 5. Akron Housing Market Area
 1990–2011 BLS Data

Year	Labor Force	Employment	Unemployment	Unemployment Rate	Statewide Unemployment Rate
1990	332,617	315,587	17,030	5.1%	5.7%
1991	336,973	316,829	20,144	6.0%	6.6%
1992	344,224	320,500	23,724	6.9%	7.4%
1993	346,406	325,362	21,044	6.1%	6.7%
1994	353,291	335,474	17,817	5.0%	5.6%
1995	356,583	340,519	16,064	4.5%	4.9%
1996	361,774	344,779	16,995	4.7%	5.0%
1997	362,337	346,286	16,051	4.4%	4.6%
1998	360,136	345,469	14,667	4.1%	4.3%
1999	363,532	348,196	15,336	4.2%	4.3%
2000	365,082	350,165	14,917	4.1%	4.0%
2001	365,160	348,718	16,442	4.5%	4.4%
2002	365,989	344,583	21,406	5.8%	5.7%
2003	370,045	347,586	22,459	6.1%	6.2%
2004	373,490	351,193	22,297	6.0%	6.1%
2005	378,862	357,362	21,500	5.7%	5.9%
2006	383,255	363,420	19,835	5.2%	5.4%
2007	385,658	365,021	20,637	5.4%	5.6%
2008	388,451	364,627	23,824	6.1%	6.5%
2009	385,305	347,554	37,751	9.8%	10.1%
2010	380,423	342,886	37,537	9.9%	10.0%
2011	374,097	342,492	31,605	8.4%	8.6%

D. HMDA DATA

The Home Mortgage Disclosure Act (HMDA) requires both depository and non-depository lenders to collect and publicly disclose information about housing-related loans and loan applications.¹⁹ The information presented in this section presents detailed HMDA data, including denial rates and predatory lending including high annual percentage rate (APR) loans.

Table 5.D.1

Purpose of Loan by Year

5. Akron Housing Market Area
2004–2011 HMDA Data

Purpose	2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	23,453	27,697	25,432	17,369	11,713	11,199	9,753	9,167	135,783
Home Improvement	4,992	6,075	5,528	4,552	3,399	1,878	1,252	1,306	28,982
Refinancing	46,339	43,972	38,280	26,920	17,632	24,417	22,699	18,924	239,183
Total	74,784	77,744	69,240	48,841	32,744	37,494	33,704	29,397	403,948

Table 5.D.2

Occupancy Status for Home Purchase Loan Applications

5. Akron Housing Market Area
2004–2011 HMDA Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	Total
Owner-Occupied	20,779	24,373	22,198	15,404	10,747	10,772	9,310	8,651	122,234
Not Owner-Occupied	2,461	3,142	3,098	1,802	916	408	435	498	12,760
Not Applicable	213	182	136	163	50	19	8	18	789
Total	23,453	27,697	25,432	17,369	11,713	11,199	9,753	9,167	135,783

Table 5.D.3

Owner-Occupied Home Purchase Loan Applications by Loan Type

5. Akron Housing Market Area
2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Conventional	18,579	22,144	20,227	13,387	6,088	4,182	3,779	4,080	92,466
FHA - Insured	1,945	1,907	1,663	1,712	4,318	6,025	4,983	3,981	26,534
VA - Guaranteed	247	315	304	300	327	436	472	457	2,858
Rural Housing Service or Farm Service Agency	8	7	4	5	14	129	76	133	376
Total	20,779	24,373	22,198	15,404	10,747	10,772	9,310	8,651	122,234

¹⁹ Data are considered “raw” because they contain entry errors and incomplete loan applications. Starting in 2004, the HMDA data made substantive changes in reporting. It modified the way it handled Hispanic data, loan interest rates, and the reporting of multifamily loan applications.

DENIAL RATES

Table 5.D.4
Loan Applications by Action Taken
 5. Akron Housing Market Area
 2004–2011 HMDA Data

Action	2004	2005	2006	2007	2008	2009	2010	2011	Total
Loan Originated	11,805	13,130	11,684	8,391	5,846	5,402	4,753	4,281	65,292
Application Approved but not Accepted	1,359	1,459	1,325	784	434	263	264	204	6,092
Application Denied	1,980	2,642	2,452	1,615	976	730	669	645	11,709
Application Withdrawn by Applicant	1,301	1,913	1,339	735	557	499	481	443	7,268
File Closed for Incompleteness	388	434	355	229	124	111	78	70	1,789
Loan Purchased by the Institution	3,946	4,770	5,039	3,647	2,808	3,765	3,065	3,008	30,048
Preapproval Request Denied	0	23	4	3	2	1	0	0	33
Preapproval Approved but not Accepted	0	2	0	0	0	1	0	0	3
Total	20,779	24,373	22,198	15,404	10,747	10,772	9,310	8,651	122,234
Denial Rate	14.4%	16.8%	17.3%	16.1%	14.3%	11.9%	12.3%	13.1%	15.2%

Table 5.D.5
Denial Rates by Gender of Applicant
 5. Akron Housing Market Area
 2004–2011 HMDA Data

Year	Male	Female	Not Available	Not Applicable	Average
2004	12.6%	15.7%	42.7%	.0%	14.4%
2005	14.4%	20.2%	33.1%	.0%	16.8%
2006	14.8%	20.6%	35.9%	.0%	17.3%
2007	14.2%	18.6%	36.0%	.0%	16.1%
2008	13.1%	15.0%	31.7%	.0%	14.3%
2009	11.5%	11.6%	23.4%	%	11.9%
2010	11.4%	13.4%	19.8%	100.0%	12.3%
2011	12.3%	12.9%	24.0%	%	13.1%
Average	13.4%	17.2%	32.5%	5.6%	15.2%

Table 5.D.6
Loan Applications by Selected Action Taken by Gender of Applicant
 5. Akron Housing Market Area
 2004–2011 HMDA Data

Gender		2004	2005	2006	2007	2008	2009	2010	2011	Total
Male	Originated	8,244	8,993	7,762	5,772	3,895	3,534	3,169	2,818	44,187
	Denied	1,187	1,513	1,346	953	587	458	407	394	6,845
	Denial Rate	12.6%	14.4%	14.8%	14.2%	13.1%	11.5%	11.4%	12.3%	13.4%
Female	Originated	3,326	3,806	3,620	2,421	1,795	1,717	1,410	1,264	19,359
	Denied	620	966	939	554	318	226	218	188	4,029
	Denial Rate	15.7%	20.2%	20.6%	18.6%	15.0%	11.6%	13.4%	12.9%	17.2%
Not Available	Originated	232	330	298	192	153	151	174	199	1,729
	Denied	173	163	167	108	71	46	43	63	834
	Denial Rate	42.7%	33.1%	35.9%	36.0%	31.7%	23.4%	19.8%	24.0%	32.5%
Not Applicable	Originated	3	1	4	6	3	0	0	0	17
	Denied	0	0	0	0	0	0	1	0	1
	Denial Rate	.0%	.0%	.0%	.0%	.0%	%	100.0%	%	5.6%
Total	Originated	11,805	13,130	11,684	8,391	5,846	5,402	4,753	4,281	65,292
	Denied	1,980	2,642	2,452	1,615	976	730	669	645	11,709
	Denial Rate	14.4%	16.8%	17.3%	16.1%	14.3%	11.9%	12.3%	13.1%	15.2%

Table 5.D.7
Denial Rates by Race/Ethnicity of Applicant
 5. Akron Housing Market Area
 2004–2011 HMDA Data

Race/Ethnicity	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	13.6%	25.0%	29.0%	26.7%	53.3%	20.0%	15.4%	16.7%	25.6%
Asian	9.0%	12.9%	18.7%	10.4%	11.2%	16.0%	13.2%	13.7%	13.1%
Black	22.8%	28.1%	32.8%	35.8%	27.2%	19.8%	20.2%	24.5%	28.4%
White	12.1%	14.2%	13.8%	13.1%	12.4%	10.8%	11.3%	11.3%	12.7%
Not Available	35.5%	30.9%	34.9%	33.9%	28.3%	20.3%	20.5%	25.6%	30.9%
Not Applicable	25.0%	.0%	.0%	.0%	.0%	0%	0%	%	12.0%
Average	14.4%	16.8%	17.3%	16.1%	14.3%	11.9%	12.3%	13.1%	15.2%
Non-Hispanic	12.7%	15.3%	15.9%	14.8%	13.6%	11.3%	11.7%	12.1%	14.0%
Hispanic	22.0%	29.7%	23.1%	20.0%	4.3%	12.3%	19.7%	15.1%	21.0%

Table 5.D.8
Loan Applications by Selected Action Taken by Race/Ethnicity of Applicant
 5. Akron Housing Market Area
 2004–2011 HMDA Data

Race		2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Originated	19	21	22	22	7	12	11	5	119
	Denied	3	7	9	8	8	3	2	1	41
	Denial Rate	13.6%	25.0%	29.0%	26.7%	53.3%	15.4%	15.4%	16.7%	25.6%
Asian	Originated	252	236	226	172	150	121	118	107	1,382
	Denied	25	35	52	20	19	23	18	17	209
	Denial Rate	9.0%	12.9%	18.7%	10.4%	11.2%	16.0%	13.2%	13.7%	13.1%
Black	Originated	826	1,050	1,040	519	321	263	217	200	4,436
	Denied	244	411	507	290	120	65	55	65	1,757
	Denial Rate	22.8%	28.1%	32.8%	35.8%	27.2%	19.8%	20.2%	24.5%	28.4%
White	Originated	10,141	10,974	9,795	7,275	5,086	4,758	4,143	3,708	55,880
	Denied	1,398	1,810	1,564	1,093	719	576	526	472	8,158
	Denial Rate	12.1%	14.2%	13.8%	13.1%	12.4%	10.8%	11.3%	11.3%	12.7%
Not Available	Originated	558	848	597	398	279	248	264	261	3,453
	Denied	307	379	320	204	110	63	68	90	1,541
	Denial Rate	35.5%	30.9%	34.9%	33.9%	28.3%	20.3%	20.5%	25.6%	30.9%
Not Applicable	Originated	9	1	4	5	3	0	0	0	22
	Denied	3	0	0	0	0	0	0	0	3
	Denial Rate	35.5%	30.9%	34.9%	33.9%	28.3%	20.3%	20.5%	25.6%	12.0%
Total	Originated	11,805	13,130	11,684	8,391	5,846	5,402	4,753	4,281	65,292
	Denied	1,980	2,642	2,452	1,615	976	730	669	645	11,709
	Denial Rate	14.4%	16.8%	17.3%	16.1%	14.3%	11.9%	12.3%	13.1%	15.2%
Non-Hispanic	Originated	9,985	12,058	10,949	7,887	5,444	5,090	4,427	3,978	59,818
	Denied	1,454	2,173	2,074	1,370	856	651	587	547	9,712
	Denial Rate	12.7%	15.3%	15.9%	14.8%	13.6%	11.3%	11.7%	12.1%	14.0%
Hispanic	Originated	124	137	130	84	67	57	53	45	697
	Denied	35	58	39	21	3	8	13	8	185
	Denial Rate	22.0%	29.7%	23.1%	20.0%	4.3%	12.3%	19.7%	15.1%	21.0%

Table 5.D.9
Loan Applications by Reason for Denial
 5. Akron Housing Market Area
 2004–2011 HMDA Data

Denial Reason	2004	2005	2006	2007	2008	2009	2010	2011	Total
Debt-to-Income Ratio	239	324	290	241	176	147	155	105	1,677
Employment History	29	42	23	37	23	14	24	14	206
Credit History	445	535	447	336	220	163	147	144	2,437
Collateral	143	211	231	198	152	140	120	143	1,338
Insufficient Cash	44	50	34	25	18	13	20	18	222
Unverifiable Information	47	109	98	89	33	27	17	20	440
Credit Application Incomplete	157	207	148	148	91	48	60	97	956
Mortgage Insurance Denied	1	0	4	0	3	5	5	0	18
Other	388	664	435	191	70	54	59	39	1,900
Missing	487	500	742	350	190	119	62	65	2,515
Total	1,980	2,642	2,452	1,615	976	730	669	645	11,709

Table 5.D.10
Denial Rates by Income of Applicant
 5. Akron Housing Market Area
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	48.0%	55.0%	40.8%	57.7%	53.4%	50.6%	45.3%	42.4%	49.3%
\$15,001–\$30,000	26.5%	31.0%	27.9%	26.8%	24.1%	17.1%	21.2%	19.1%	25.9%
\$30,001–\$45,000	17.4%	19.0%	21.4%	18.3%	17.0%	12.7%	13.8%	14.4%	17.7%
\$45,001–\$60,000	13.2%	15.5%	16.5%	15.7%	14.2%	9.3%	9.8%	13.9%	14.1%
\$60,001–\$75,000	8.9%	11.9%	15.1%	14.1%	9.9%	10.1%	8.2%	11.2%	11.6%
Above \$75,000	7.4%	9.5%	11.1%	11.1%	9.2%	8.6%	9.3%	9.6%	9.6%
Data Missing	18.5%	20.9%	15.3%	18.9%	22.4%	36.2%	33.9%	23.3%	19.7%
Total	14.4%	16.8%	17.3%	16.1%	14.3%	11.9%	12.3%	13.1%	15.2%

Table 5.D.11
Denial Rates of Loans by Race/Ethnicity and Income of Applicant
 5. Akron Housing Market Area
 2004–2011 HMDA Data

Race	<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	Above \$75K	Data Missing	Average
American Indian	100.0%	47.8%	21.7%	29.4%	33.3%	5.6%	25.0%	25.6%
Asian	87.5%	21.5%	21.6%	16.6%	9.9%	8.2%	9.3%	13.1%
Black	44.1%	35.9%	28.8%	26.8%	24.9%	24.0%	29.1%	28.4%
White	48.1%	22.1%	15.0%	12.1%	9.7%	7.9%	14.5%	12.7%
Not Available	57.4%	52.1%	36.6%	27.1%	22.1%	18.0%	52.3%	30.9%
Not Applicable	%	.0%	100.0%	100.0%	.0%	.0%	.0%	12.0%
Average	49.3%	25.9%	17.7%	14.1%	11.6%	9.6%	19.7%	15.2%
Non-Hispanic Ethnicity	48.4%	23.6%	16.1%	13.3%	10.9%	9.0%	15.4%	14.0%
Hispanic (Ethnicity)	40.0%	32.6%	24.3%	19.3%	16.3%	15.4%	11.1%	21.0%

Table 5.D.12
Loan Applications by Reason for Denial by Race/Ethnicity of Applicant
 5. Akron Housing Market Area
 2004–2011 HMDA Data

Denial Reason	American Indian	Asian	Black	White	Not Available	Not Applicable	Total	Hispanic (Ethnicity)
Debt-to-Income Ratio	4	52	235	1,213	173	0	1,677	33
Employment History	2	4	22	164	14	0	206	1
Credit History	5	32	352	1,755	293	0	2,437	44
Collateral	3	27	157	1,001	149	1	1,338	22
Insufficient Cash	1	7	33	152	29	0	222	2
Unverifiable Information	1	13	92	284	50	0	440	5
Credit Application Incomplete	3	17	113	699	124	0	956	9
Mortgage Insurance Denied	1	0	1	13	3	0	18	0
Other	7	27	321	1,240	303	2	1,900	28
Missing	14	30	431	1,637	403	0	2,515	41
Total	41	209	1,757	8,158	1,541	3	11,709	185
% Missing	34.1%	14.4%	24.5%	20.1%	26.2%	.0%	21.5%	22.2%

Table 5.D.13
Loan Applications by Income of Applicant: Originated and Denied
 5. Akron Housing Market Area
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Loan Originated	52	54	74	30	27	38	29	19	323
	Application Denied	48	66	51	41	31	39	24	14	314
	Denial Rate	48.0%	55.0%	40.8%	57.7%	53.4%	50.6%	45.3%	42.4%	49.3%
\$15,001–\$30,000	Loan Originated	1,400	1,486	1,284	854	623	714	548	507	7,416
	Application Denied	504	668	496	313	198	147	147	120	2,593
	Denial Rate	26.5%	31.0%	27.9%	26.8%	24.1%	17.1%	21.2%	19.1%	25.9%
\$30,001–\$45,000	Loan Originated	2,619	2,961	2,417	1,718	1,315	1,321	994	847	14,192
	Application Denied	552	694	660	384	270	193	159	143	3,055
	Denial Rate	17.4%	19.0%	21.4%	18.3%	17.0%	12.7%	13.8%	14.4%	17.7%
\$45,001–\$60,000	Loan Originated	2,325	2,466	2,151	1,534	1,080	1,072	878	702	12,208
	Application Denied	353	451	426	285	179	110	95	113	2,012
	Denial Rate	13.2%	15.5%	16.5%	15.7%	14.2%	9.3%	9.8%	13.9%	14.1%
\$60,001–\$75,000	Loan Originated	1,626	1,768	1,497	1,102	743	670	570	556	8,532
	Application Denied	159	238	266	181	82	75	51	70	1,122
	Denial Rate	8.9%	11.9%	15.1%	14.1%	9.9%	10.1%	8.2%	11.2%	11.6%
Above \$75,000	Loan Originated	3,370	4,002	3,869	3,007	2,013	1,550	1,695	1,604	21,110
	Application Denied	270	421	482	377	203	145	173	171	2,242
	Denial Rate	7.4%	9.5%	11.1%	11.1%	9.2%	8.6%	9.3%	9.6%	9.6%
Data Missing	Loan Originated	413	393	392	146	45	37	39	46	1,511
	Application Denied	94	104	71	34	13	21	20	14	371
	Denial Rate	18.5%	20.9%	15.3%	18.9%	22.4%	36.2%	33.9%	23.3%	19.7%
Total	Loan Originated	11,805	13,130	11,684	8,391	5,846	5,402	4,753	4,281	65,292
	Application Denied	1,980	2,642	2,452	1,615	976	730	669	645	11,709
	Denial Rate	14.4%	16.8%	17.3%	16.1%	14.3%	11.9%	12.3%	13.1%	15.2%

Table 5.D.14
Loan Applications by Income and Race/Ethnicity of Applicant: Originated and Denied
 5. Akron Housing Market Area
 2004–2011 HMDA Data

Race		<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	> \$75K	Data Missing	Total
American Indian	Loan Originated	0	12	36	24	10	34	3	119
	Application Denied	2	11	10	10	5	2	1	41
	Denial Rate	100.0%	47.8%	21.7%	29.4%	33.3%	5.6%	25.0%	25.6%
Asian	Loan Originated	1	113	174	191	201	663	39	1,382
	Application Denied	7	31	48	38	22	59	4	209
	Denial Rate	87.5%	21.5%	21.6%	16.6%	9.9%	8.2%	9.3%	13.1%
Black	Loan Originated	38	752	1,095	778	537	1,146	90	4,436
	Application Denied	30	422	444	285	178	361	37	1,757
	Denial Rate	44.1%	35.9%	28.8%	26.8%	24.9%	24.0%	29.1%	28.4%
White	Loan Originated	255	6,199	12,188	10,631	7,350	17,986	1,271	55,880
	Application Denied	236	1,760	2,148	1,461	794	1,543	216	8,158
	Denial Rate	48.1%	22.1%	15.0%	12.1%	9.7%	7.9%	14.5%	12.7%
Not Available	Loan Originated	29	339	699	584	433	1,266	103	3,453
	Application Denied	39	369	403	217	123	277	113	1,541
	Denial Rate	57.4%	52.1%	36.6%	27.1%	22.1%	18.0%	52.3%	30.9%
Not Applicable	Loan Originated	0	1	0	0	1	15	5	22
	Application Denied	0	0	2	1	0	0	0	3
	Denial Rate	%	.0%	100.0%	100.0%	.0%	.0%	.0%	12.0%
Total	Loan Originated	323	7,416	14,192	12,208	8,532	21,110	1,511	65,292
	Application Denied	314	2,593	3,055	2,012	1,122	2,242	371	11,709
	Denial Rate	49.3%	25.9%	17.7%	14.1%	11.6%	9.6%	19.7%	15.2%
Non-Hispanic Ethnicity	Loan Originated	283	6,835	13,145	11,219	7,850	19,149	1,337	59,818
	Application Denied	265	2,112	2,525	1,718	960	1,889	243	9,712
	Denial Rate	48.4%	23.6%	16.1%	13.3%	10.9%	9.0%	15.4%	14.0%
Hispanic (Ethnicity)	Loan Originated	6	89	143	142	82	219	16	697
	Application Denied	4	43	46	34	16	40	2	185
	Denial Rate	40.0%	32.6%	24.3%	19.3%	16.3%	15.4%	11.1%	21.0%

PREDATORY LENDING

Table 5.D.15
Originated Owner-Occupied Loans by HAL Status
 5. Akron Housing Market Area
 2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Other	10,336	10,002	8,919	7,389	5,185	4,993	4,720	4,249	55,793
HAL	1,469	3,128	2,765	1,002	661	409	33	32	9,499
Total	11,805	13,130	11,684	8,391	5,846	5,402	4,753	4,281	65,292
Percent HAL	12.4%	23.8%	23.7%	11.9%	11.3%	7.6%	.7%	.7%	14.5%

Table 5.D.16
Loans by Loan Purpose by HAL Status
 5. Akron Housing Market Area
 2004–2011 HMDA Data

Loan Purpose		2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	Other	10,336	10,002	8,919	7,389	5,185	4,993	4,720	4,249	55,793
	HAL	1,469	3,128	2,765	1,002	661	409	33	32	9,499
	Percent HAL	12.4%	23.8%	23.7%	11.9%	11.3%	7.6%	.7%	.7%	14.5%
Home Improvement	Other	1,275	1,500	1,457	1,191	888	427	340	368	7,446
	HAL	403	524	488	372	179	95	43	29	2,133
	Percent HAL	24.0%	25.9%	25.1%	23.8%	16.8%	18.2%	11.2%	7.3%	22.3%
Refinancing	Other	12,906	9,107	7,475	6,283	4,961	10,299	10,775	8,665	70,471
	HAL	2,936	4,130	3,610	1,680	726	560	78	76	13,796
	Percent HAL	18.5%	31.2%	32.6%	21.1%	12.8%	5.2%	.7%	.9%	16.4%
Total	Other	24,517	20,609	17,851	14,863	11,034	15,719	15,835	13,282	133,710
	HAL	4,808	7,782	6,863	3,054	661	409	33	32	25,428
	Percent HAL	16.4%	27.4%	27.8%	17.0%	12.4%	6.3%	1.0%	1.0%	16.0%

Table 5.D.17
HALs Originated by Race of Borrower
 5. Akron Housing Market Area
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	2	5	5	5	1	0	0	0	18
Asian	14	18	27	10	14	7	0	0	90
Black	208	503	579	146	58	37	0	0	1,531
White	1,108	2,137	1,914	765	556	353	32	31	6,896
Not Available	137	465	238	76	32	12	1	1	962
Not Applicable	0	0	2	0	0	0	0	0	2
Total	1,469	3,128	2,765	1,002	661	409	33	32	9,499
Hispanic (Ethnicity)	20	48	36	15	9	3	0	0	131

Table 5.D.18
Rate of HALs Originated by Race/Ethnicity of Borrower
 5. Akron Housing Market Area
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	10.5%	23.8%	22.7%	22.7%	14.3%	.0%	.0%	.0%	15.1%
Asian	5.6%	7.6%	11.9%	5.8%	9.3%	5.8%	.0%	.0%	6.5%
Black	25.2%	47.9%	55.7%	28.1%	18.1%	14.1%	.0%	.0%	34.5%
White	10.9%	19.5%	19.5%	10.5%	10.9%	7.4%	.8%	.8%	12.3%
Not Available	24.6%	54.8%	39.9%	19.1%	11.5%	4.8%	.4%	.4%	27.9%
Not Applicable	.0%	.0%	50.0%	.0%	.0%	%	%	%	9%
Average	12.4%	23.8%	23.7%	11.9%	11.3%	7.6%	0.7%	0.7%	14.5%
Non-Hispanic Ethnicity	12.2%	21.5%	22.8%	11.6%	11.1%	7.6%	.7%	.8%	13.8%
Hispanic (Ethnicity)	16.1%	35.0%	27.7%	17.9%	13.4%	5.3%	.0%	.0%	18.8%

Table 5.D.19
Loans by HAL Status by Race/Ethnicity of Borrower
 5. Akron Housing Market Area
 2004–2011 HMDA Data

Race	Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Other	17	16	17	17	6	12	11	5	101
	HAL	2	5	5	5	1	0	0	0	18
	Percent HAL	10.5%	23.8%	22.7%	22.7%	14.3%	.0%	.0%	.0%	15.1%
Asian	Other	238	218	199	162	136	114	118	107	1,292
	HAL	14	18	27	10	14	7	0	0	90
	Percent HAL	5.6%	7.6%	11.9%	5.8%	9.3%	5.8%	.0%	.0%	6.5%
Black	Other	618	547	461	373	263	226	217	200	2,905
	HAL	208	503	579	146	58	37	0	0	1,531
	Percent HAL	25.2%	47.9%	55.7%	28.1%	18.1%	14.1%	.0%	.0%	34.5%
White	Other	9,033	8,837	7,881	6,510	4,530	4,405	4,111	3,677	48,984
	HAL	1,108	2,137	1,914	765	556	353	32	31	6,896
	Percent HAL	10.9%	19.5%	19.5%	10.5%	10.9%	7.4%	0.8%	0.8%	12.3%
Not Available	Other	421	383	359	322	247	236	263	260	2,491
	HAL	137	465	238	76	32	12	1	1	962
	Percent HAL	24.6%	54.8%	39.9%	19.1%	11.5%	4.8%	.4%	.4%	27.9%
Not Applicable	Other	9	1	2	5	3	0	0	0	20
	HAL	0	0	2	0	0	0	0	0	2
	Percent HAL	.0%	.0%	50.0%	.0%	.0%	%	%	%	9.0%
Total	Other	10,336	10,002	8,919	7,389	5,185	4,993	4,720	4,249	55,793
	HAL	1,469	3,128	2,765	1,002	661	409	33	32	9,499
	Percent HAL	12.4%	23.8%	23.7%	11.9%	11.3%	7.6%	.7%	.7%	14.5%
Non-Hispanic Ethnicity	Other	8,762	9,467	8,457	6,971	4,842	4,703	4,395	3,947	51,544
	HAL	1,223	2,591	2,492	916	602	387	32	31	8,274
	Percent HAL	12.2%	21.5%	22.8%	11.6%	11.1%	7.6%	.7%	.8%	13.8%
Hispanic (Ethnicity)	Other	104	89	94	69	58	54	53	45	566
	HAL	20	48	36	15	9	3	0	0	131
	Percent HAL	16.1%	35.0%	27.7%	17.9%	13.4%	5.3%	.0%	.0%	18.8%

Table 5.D.20
Rates of HALs by Income of Borrower
 5. Akron Housing Market Area
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Average
\$15,000 or Below	11.5%	20.4%	17.6%	16.7%	11.1%	15.8%	.0%	.0%	13.6%
\$15,001–\$30,000	20.5%	35.1%	37.1%	23.2%	21.5%	13.2%	.7%	1.8%	23.2%
\$30,001–\$45,000	17.9%	34.6%	29.5%	15.3%	15.1%	10.1%	.9%	1.1%	19.9%
\$45,001–\$60,000	13.7%	26.6%	26.5%	13.0%	11.1%	6.4%	1.3%	.4%	16.0%
\$60,001–\$75,000	9.3%	21.3%	19.2%	11.0%	8.9%	5.2%	.5%	.7%	12.2%
Above \$75,000	6.2%	11.5%	14.6%	6.1%	6.8%	4.6%	0.4%	.4%	7.8%
Data Missing	7.0%	20.1%	36.0%	21.9%	4.4%	2.7%	.0%	.0%	18.8%
Average	12.4%	23.8%	23.7%	11.9%	11.3%	7.6%	.7%	.7%	14.5%

Table 5.D.21
Loans by HAL Status by Income of Borrower
 5. Akron Housing Market Area
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Other	46	43	61	25	24	32	29	19	279
	HAL	6	11	13	5	3	6	0	0	44
	Percent HAL	11.5%	20.4%	17.6%	16.7%	11.1%	15.8%	.0%	.0%	13.6%
\$15,001–\$30,000	Other	1,113	965	808	656	489	620	544	498	5,693
	HAL	287	521	476	198	134	94	4	9	1,723
	Percent HAL	20.5%	35.1%	37.1%	23.2%	21.5%	13.2%	.7%	1.8%	23.2%
\$30,001–\$45,000	Other	2,150	1,936	1,704	1,455	1,116	1,188	985	838	11,372
	HAL	469	1,025	713	263	199	133	9	9	2,820
	Percent HAL	17.9%	34.6%	29.5%	15.3%	15.1%	10.1%	.9%	1.1%	19.9%
\$45,001–\$60,000	Other	2,006	1,811	1,580	1,334	960	1,003	867	699	10,260
	HAL	319	655	571	200	120	69	11	3	1,948
	Percent HAL	13.7%	26.6%	26.5%	13.0%	11.1%	6.4%	1.3%	.4%	16.0%
\$60,001–\$75,000	Other	1,475	1,392	1,210	981	677	635	567	552	7,489
	HAL	151	376	287	121	66	35	3	4	1,043
	Percent HAL	9.3%	21.3%	19.2%	11.0%	8.9%	5.2%	.5%	.7%	12.2%
Above \$75,000	Other	3,162	3,541	3,305	2,824	1,876	1,479	1,689	1,597	19,473
	HAL	208	461	564	183	137	71	6	7	1,637
	Percent HAL	6.2%	11.5%	14.6%	6.1%	6.8%	4.6%	.4%	.4%	7.8%
Data Missing	Other	384	314	251	114	43	36	39	46	1,227
	HAL	29	79	141	32	2	1	0	0	284
	Percent HAL	7.0%	20.1%	36.0%	21.9%	4.4%	2.7%	.0%	.0%	18.8%
Total	Other	10,336	10,002	8,919	7,389	5,185	4,993	4,720	4,249	55,793
	HAL	1,469	3,128	2,765	1,002	661	409	33	32	9,499
	Percent HAL	12.4%	23.8%	23.7%	11.9%	11.3%	7.6%	.7%	.7%	14.5%

E. CRA DATA

Additional data tables related to Community Reinvestment Act (CRA) data are presented in this section.

Table 5.E.1
Small Business Loans Originated: \$100,000 or Less by Tract MFI
 5. Akron Housing Market Area
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	560	1,136	5,544	3,310		10,550
2001	737	1,356	6,234	3,341		11,668
2002	847	1,573	7,344	4,015		13,779
2003	1,177	1,792	6,632	4,943		14,544
2004	1,096	1,727	6,446	4,901		14,170
2005	1,051	1,763	7,029	5,402		15,245
2006	1,277	2,315	9,471	8,272		21,335
2007	1,368	2,430	10,197	9,005		23,000
2008	1,016	1,897	7,806	6,817		17,536
2009	484	748	3,361	3,111		7,704
2010	450	657	2,919	2,676		6,702
2011	522	860	3,670	3,372		8,424
Total	10,585	18,254	76,653	59,165	0	164,657
Loan Amount (\$1,000s)						
2000	8,448	17,576	70,882	43,304		140,210
2001	10,445	19,057	76,575	41,755		147,832
2002	10,620	18,245	83,788	46,357		159,010
2003	13,810	19,272	65,593	51,912		150,587
2004	13,456	19,520	65,552	54,928		153,456
2005	15,120	18,117	79,963	63,527		176,727
2006	13,371	24,979	94,300	85,283		217,933
2007	16,158	26,909	100,126	92,357		235,550
2008	11,178	19,890	75,861	71,198		178,127
2009	6,919	9,685	40,174	37,581		94,359
2010	6,500	9,565	40,332	37,543		93,940
2011	8,865	12,264	53,904	50,725		125,758
Total	134,890	215,079	847,050	676,470	0	1,873,489

Table 5.E.2
Small Business Loans Originated: \$100,001 to \$250,000 by Tract MFI
 5. Akron Housing Market Area
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	52	56	218	150		476
2001	48	87	303	200		638
2002	53	64	331	189		637
2003	70	90	257	190		607
2004	62	94	262	209		627
2005	63	72	244	183		562
2006	75	79	273	210		637
2007	60	66	208	213		547
2008	38	47	169	130		384
2009	35	26	136	115		312
2010	35	53	170	184		442
2011	44	50	171	170		435
Total	635	784	2,742	2,143	0	6,304
Loan Amount (\$1,000s)						
2000	9,515	9,583	37,171	26,658		82,927
2001	8,249	14,951	53,988	36,194		113,382
2002	9,720	11,564	57,369	33,243		111,896
2003	12,832	16,036	44,112	34,860		107,840
2004	10,981	17,448	46,548	36,925		111,902
2005	11,308	12,342	45,005	33,774		102,429
2006	13,334	14,237	48,992	37,750		114,313
2007	11,255	11,487	37,660	38,290		98,692
2008	6,977	7,441	29,365	23,176		66,959
2009	6,349	4,511	23,870	20,704		55,434
2010	6,775	9,191	29,984	32,632		78,582
2011	8,211	9,041	30,460	30,034		77,746
Total	115,506	137,832	484,524	384,240	0	1,122,102

Table 5.E.3
Small Business Loans Originated: More than \$250,000 by Tract MFI
 5. Akron Housing Market Area
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	35	32	176	153		396
2001	51	67	234	181		533
2002	68	60	328	248		704
2003	60	66	236	250		612
2004	71	82	219	237		609
2005	85	64	237	248		634
2006	66	83	230	231		610
2007	57	71	208	216		552
2008	58	46	141	207		452
2009	36	47	141	134		358
2010	63	54	164	185		466
2011	61	56	168	191		476
Total	711	728	2,482	2,481	0	6,402
Loan Amount (\$1,000s)						
2000	17,485	14,544	89,505	78,659		200,193
2001	26,981	34,984	123,865	95,311		281,141
2002	37,953	33,894	174,775	133,476		380,098
2003	32,185	31,598	127,127	133,711		324,621
2004	37,995	42,200	118,701	129,003		327,899
2005	45,955	33,907	127,316	136,126		343,304
2006	34,082	42,449	125,499	127,844		329,874
2007	34,431	39,613	108,136	112,234		294,414
2008	29,977	22,735	76,836	116,920		246,468
2009	18,546	27,363	75,308	74,458		195,675
2010	35,784	28,834	86,543	106,029		257,190
2011	32,828	28,867	90,186	106,470		258,351
Total	384,202	380,988	1,323,797	1,350,241	0	3,439,228

Table 5.E.4
Small Business Loans to Businesses with Gross Annual Revenues of Less Than
\$1 Million by Tract MFI
 5. Akron Housing Market Area
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	202	486	2,403	1,263		4,354
2001	266	505	2,836	1,515		5,122
2002	218	413	2,127	1,280		4,038
2003	336	529	2,089	1,568		4,522
2004	350	518	2,134	1,640		4,642
2005	441	768	3,135	2,361		6,705
2006	397	838	3,688	2,841		7,764
2007	481	856	3,859	3,019		8,215
2008	293	573	2,375	1,909		5,150
2009	170	217	1,177	1,015		2,579
2010	147	224	1,056	845		2,272
2011	216	364	1,672	1,479		3,731
Total	3,517	6,291	28,551	20,735	0	59,094
Loan Amount (\$1,000s)						
2000	7,390	21,098	88,022	65,050		181,560
2001	11,977	17,207	110,390	70,765		210,339
2002	16,856	22,204	129,265	97,901		266,226
2003	16,137	23,699	86,638	84,965		211,439
2004	13,728	18,880	72,709	73,658		178,975
2005	16,746	20,559	87,097	85,211		209,613
2006	14,296	19,305	88,183	83,497		205,281
2007	13,971	19,592	88,941	75,146		197,650
2008	11,922	14,560	61,292	59,028		146,802
2009	11,418	7,725	35,736	36,570		91,449
2010	7,149	10,321	45,491	47,532		110,493
2011	10,681	14,924	57,630	46,565		129,800
Total	152,271	210,074	951,394	825,888	0	2,139,627

F. COMPLAINT DATA

This section contains data regarding fair housing complaints, as provided by the U.S. Department of Housing and Urban Development (HUD), the Ohio Civil Rights Commission (OCRC), and the Fair Housing Contact Service (FHCS).

HUD COMPLAINTS

Table 5.F.1
Fair Housing Complaints by Basis
 5. Akron Housing Market Area
 2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color	1		1	1	11	5	1		1	21
Disability	50	44	45	37	29	38	40	36	21	340
Family Status	19	10	13	17	13	40	28	28	3	171
National Origin	2		3	1	2	2	3	1	1	15
Race	45	18	37	19	24	24	11	22	10	210
Religion	1	2			1	1	3			8
Sex	12	16	15	5	11	13	11	4	8	95
Total Bases	130	90	114	80	91	123	97	91	44	860
Total Complaints	124	80	99	69	63	96	81	85	35	732

Table 5.F.2
Fair Housing Complaints by Issue
 5. Akron Housing Market Area
 2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Discriminatory refusal to sell		3						1	3	7
Discriminatory refusal to sell and negotiate for sale	1	1	1			1				4
Discriminatory refusal to rent	16	13	13	18	8	6	12	6	6	98
Discriminatory refusal to negotiate for rental	3		3			3	5	2		16
Discriminatory refusal to rent and negotiate for rental	15	5	2	5	4	7	1	1	1	41
Discriminatory advertising, statements, and notices	4	2	2	3	2	6	8	2	2	31
Discriminatory advertising - sale	2									2
Discriminatory advertisement - rental	3		2	1	1	26	9	21		63
False denial or representation of availability									1	1
False denial or representation of availability - rental	3		3		3	2	1			12
Discriminatory financing (includes real estate transactions)	1		1	1	2			1		6
Discrimination in making of loans	6	1					2			9
Discrimination in the terms or conditions for making loans	2		1				1	2		6
Discrimination in the appraising of residential real property				1						1
Discriminatory brokerage service							1			1
Discrimination in terms and conditions of membership	2	1								3
Discriminatory terms, conditions, privileges, or services and facilities	16	12	14	14	14	14	11	11	19	125
Discrimination in terms, conditions, privileges relating to sale	1	1	1		2				2	7
Discrimination in terms, conditions or privileges relating to rental	29	14	24	13	18	20	29	17	4	168
Discrimination in services and facilities relating to rental	2	2	4	3	2		1	2		16
Refusing to provide insurance	1				1					2
Steering	1									1
Otherwise deny or make housing available	2			1			1	1	7	12
Other discriminatory acts	16	9	12	3	12	2	6	2	2	64
Restriction of choices relative to a rental	2					2				4
Refusing to provide municipal services or property				1				1		2
Discriminatory acts under Section 818 (coercion, etc.)	1	2	9	4		3	6	5	4	34
Using ordinances to discriminate in zoning and land use							1			1
Non-compliance with design and construction requirements (handicap)	2		6	3	1				6	18
Failure to provide an accessible building entrance	1		1							2
Failure to provide accessible and usable public and common user areas	2		3	1				3		9
Failure to provide an accessible route into and thru the covered unit	1	1	2	2				1		7
Failure to provide usable kitchens and bathrooms	1	1								2
Failure to permit reasonable modification		1	1					2	2	6
Failure to make reasonable accommodation	22	14	16	11	7	24	26	21	11	152
Total Issues	158	83	121	85	77	116	121	102	70	933
Total Complaints	124	80	99	69	63	96	81	85	35	732

Table 5.F.3
Fair Housing Complaints by Closure Status
 5. Akron Housing Market Area
 2004–2012 HUD Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Administrative Closure	8	4	11	14	9	20	4	7	3	80
Cause (FHAP)	19	6	12	8	4	17	20	23		109
Charged (HUD)					1	3				4
Conciliated / Settled	45	39	43	22	19	25	30	21	6	250
No Cause	52	31	33	25	30	31	24	26		252
Open							3	8	26	37
Total Complaints	124	80	99	69	63	96	81	85	35	732

HUD Complaints Found With Cause

Table 5.F.4
Fair Housing Complaints Found With Cause by Basis
 5. Akron Housing Market Area
 2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color			1	1						2
Disability	26	29	30	19	13	23	26	13	4	183
Family Status	12	6	7	9	11	20	20	21	1	107
National Origin	1		3	1		2	1	1		9
Race	24	10	14	4	3	9	4	7	1	76
Religion							1			1
Sex	7	6	6	1	1	7	5	2		35
Total Bases	70	51	61	35	28	61	57	44	6	413
Total Complaints	64	45	55	30	24	45	50	44	6	363

Table 5.F.5
Fair Housing Complaints Found With Cause by Issue
 5. Akron Housing Market Area
 2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Discriminatory refusal to sell		1						1	1	3
Discriminatory refusal to sell and negotiate for sale	1	1				1				3
Discriminatory refusal to rent	8	7	5	8	1	2	10	4	1	46
Discriminatory refusal to negotiate for rental	2		2			3	2			9
Discriminatory refusal to rent and negotiate for rental	9	3		2	3	6	1			24
Discriminatory advertising, statements, and notices	2	1		2	2	6	5	2	1	21
Discriminatory advertising - sale	1									1
Discriminatory advertisement - rental	2			1	1	9	7	17		37
False denial or representation of availability - rental	3		2		1	2	1			9
Discriminatory financing (includes real estate transactions)	1									1
Discrimination in making of loans	2									2
Discrimination in the terms or conditions for making loans	1						1	1		3
Discriminatory brokerage service							1			1
Discrimination in terms and conditions of membership		1								1
Discriminatory terms, conditions, privileges, or services and facilities	5	6	9	8	5	6	5	7	3	54
Discrimination in terms, conditions, privileges relating to sale									1	1
Discrimination in terms, conditions or privileges relating to rental	13	7	10	3	6	9	20	7		75
Discrimination in services and facilities relating to rental	1		4	2	1		1	1		10
Refusing to provide insurance					1					1
Steering	1									1
Otherwise deny or make housing available	1			1				1	1	4
Other discriminatory acts	10	6	5	1	2	1	1	1	2	29
Restriction of choices relative to a rental	1					2				3
Discriminatory acts under Section 818 (coercion, etc.)			5			1	3	3		12
Non-compliance with design and construction requirements (handicap)	2		5	3	1					11
Failure to provide an accessible building entrance	1		1							2
Failure to provide accessible and usable public and common user areas	2		3	1						6
Failure to provide an accessible route into and thru the covered unit	1	1	2	2						6
Failure to provide usable kitchens and bathrooms	1	1								2
Failure to permit reasonable modification		1	1					1		3
Failure to make reasonable accommodation	13	10	12	7	5	14	17	10	3	91
Total Issues	84	46	66	41	29	62	75	56	13	472
Total Complaints	64	45	55	30	24	45	50	44	6	363

OHIO CIVIL RIGHTS COMMISSION COMPLAINTS

Table 5.F.6
Fair Housing Complaints by Basis
 5. Akron Housing Market Area
 2004–2012 OCRC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Age			1							1
Ancestry				1			1			2
Color	4	6	12	2	6	4	3	9	1	47
Disability	54	42	50	44	24	25	36	36	5	316
Family Status	16	5	12	16	19	9	19	8	1	105
Gender	14	13	25	9	13	10	7	7	3	101
National Origin	2	1	3	1	1	2	3	1	1	15
Race	36	27	43	23	24	11	11	28	6	225
Religion	3	2	2	2	1	1	1	1		13
Retaliation	12	15	26	11	14	11	6	55	3	153
Other	4		2	3					1	10
Total Bases	145	111	176	112	105	86	87	145	21	988
Total Complaints	116	84	119	78	63	54	66	121	14	715

Table 5.F.7
Fair Housing Complaints by Issue
 5. Akron Housing Market Area
 2004–2012 OCRC Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Advertising	3		2	1		1	2	4		13
Constructive Discharge			1							1
Demotion						1				1
Exclusion	4			1	4	3				12
Harassment	11	4	16	2	9	5	5	7	1	60
Intimidation	8	3	20	6	12	6	6	11	2	74
Other	58	38	26	11	13	12	14	46	12	230
Reasonable Accommodation	14	7	18	11		5	29	17	3	104
Sexual Harassment	6	2	8	2	2		2			22
Terms and Conditions	39	42	86	57	44	34	42	62	4	410
Total Issues	143	96	177	91	84	67	100	147	22	927
Total Complaints	116	84	119	78	63	54	66	121	14	715

Table 5.F.8
Fair Housing Complaints by Closure Status
 5. Akron Housing Market Area
 2004–2012 OCRC Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Administrative Closure	6	2	3		2	9	8	12		42
CP Failed to Cooperate	3	1	4	12	1		1	2	1	25
CP Withdrawal – No Benefit	5	3	9	4	10	3	3	4	3	44
Hearings Discrimination Finding			1							1
No Cause Finding Issued	47	41	46	33	33	21	17	26		264
No Jurisdiction	1	1	3		1	1	2	2	3	14
Open Charge Closed By Legal Activity		1	3							4
Settlement With Benefits	27	22	29	16	9	15	22	16	3	159
Successful Conciliation	3	3	4	7			1	1		19
Withdrawal With Benefits	21	10	17	6	7	5	12	58	4	140
Missing	3									3
Total Complaints	116	84	119	78	63	54	66	121	14	715

FAIR HOUSING CONTACT SERVICE COMPLAINTS

Table 5.F.9
Fair Housing Complaints by Basis
 5. Akron Housing Market Area
 2004–2012 FHCS Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Advertising	5									5
Age					1	1		1		3
Ancestry				1	1					2
Color	3	4	8	7	7			3	1	33
Criminal Background					2	2				4
Disability	31	7	78	68	71	62	67	79	46	509
Familial Status	15	4	41	21	35	26	37	29	2	210
Harassment				3	7	3	3			16
National Origin			12	3	8	7	5	4	2	41
Race	21	8	51	35	35	42	30	30	17	269
Retaliation	1		15	9	15	14	8	8	5	75
Sex	6	3	20	12	16	18	15	11	15	116
Other				6	15	8	2	1	1	33
None			14							14
Unknown				5	1					6
Total Bases	82	26	239	170	214	183	167	166	89	1,336
Total Complaints	65	20	193	131	173	131	138	154	79	1,084

Table 5.F.10
Fair Housing Complaints by Closure Status
 5. Akron Housing Market Area
 2004–2012 FHCS Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Closed			70	45	47	60	12	22	4	260
Dismissed			6	1	3	2	1	1		14
Elected not to pursue						11	12	5	10	38
Independently resolved						21	15	20	6	62
Inquiry			46	32	78	3	1	3	15	178
Lack of jurisdiction					10				1	11
No contact							44	45	8	97
No probable cause			20	21	13	10	6	9		79
Pending			12	19	2		1	2	6	42
Probable cause			8	4		4	15	14		45
Reasonable accommodation granted				1			4	8	7	20
Reasonable modification granted							1	3	2	6
Referred for other assistance							7	3	9	19
Settled			31	6	8	19	19	15	7	105
Settled through OCRC					7	1			1	9
Withdrawal of Charge					4			4	3	11
Missing	65	20		2	1					88
Total Complaints	65	20	193	131	173	131	138	154	79	1,084

THE HOUSING RESEARCH AND ADVOCACY CENTER

Table 5.F.11
Fair Housing Complaints by Basis

5 Akron Housing Market Area
2004–2012 HRAC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability				1				1		2
Race				1			1			2
Sex				1			1			2
Accessibility						1				1
Total Bases	0	0	0	3	0	1	2	1	0	7
Total Complaints				2		1	2	1		6

Table 5.F.12
Fair Housing Complaints by Issue

5 Akron Housing Market Area
2004–2012 HRAC Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Rental				1		1	2	1		5
Sale				1						1
Total	0	0	0	2	0	1	2	1	0	6
Total Complaints				2		1	2	1		6

Table 5.F.13
Fair Housing Complaints by Action Taken

5 Akron Housing Market Area
2004–2012 HRAC Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Referred to OCRC				2			1			3
Fair Housing Info Given						1				1
Total	0	0	0	2	0	1	1	0	0	4
Total Complaints				2		1	2	1		6

G. FAIR HOUSING SURVEY FOR HOUSING STAKEHOLDERS DATA

This section presents public involvement data gathered through the 2012–2013 Fair Housing Survey for Housing Stakeholders.

Table 5.G.1

Primary Role of Respondent

5. Akron Housing Market Area
2012–2013 Fair Housing Survey for Housing
Stakeholders Data

Primary Role	Total
Advocate/Service Provider	14
Construction/Development	4
Law/Legal Services	2
Local Government	5
Property Management	5
Real Estate	2
Resident Advisory Council Leader	1
Other Role	5
Total	38

FEDERAL, STATE, AND LOCAL LAWS

Table 5.G.2

**Familiarity with Fair
Housing Laws**

5. Akron Housing Market Area
2012–2013 Fair Housing Survey
for Housing Stakeholders Data

Familiarity	Total
Not Familiar	3
Somewhat Familiar	10
Very Familiar	16
Missing	9
Total	38

Table 5.G.3

Perceptions About Fair Housing Laws

5. Akron Housing Market Area
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?	23	5	1	9	38
Are fair housing laws difficult to understand or follow?	12	15	1	10	38
Do you think fair housing laws should be changed?	7	12	9	10	38
Do you think fair housing laws are adequately enforced?	20	3	3	12	38

Table 5.G.4**Fair Housing Activities**

5. Akron Housing Market Area
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?		20	3	3	12	38
Have you participated in fair housing training?		18	5	1	14	38
Are you aware of any fair housing testing?		18	6	2	12	38
Testing and education	Too Little	Right Amount	Too Much	Don't Know	Missing	Total
Is there sufficient outreach and education activity?	9	8	3	6	12	38
Is there sufficient testing?	6	5		15	12	38

Table 5.G.5**Protected Classes**

5. Akron Housing Market Area
2012–2013 Fair Housing Survey
for Housing Stakeholders Data

Protected Class	Total
Family Status	15
Religion	11
Gender	10
National Origin	6
Color	8
Sexual Orientation	4
Age	5
Military	5
Disability	3
Ancestry	1
Race	1
Other	4
Total	74

Table 5.G.6**Fair Housing Violation Referrals**

5. Akron Housing Market Area
2012–2013 Fair Housing Survey for Housing
Stakeholders Data

Referral	Total
ACLU	1
County	1
Fair Housing Advocates Association	7
Fair Housing Contact Service	17
HUD	4
Lawyer	1
Legal Aid	1
OCRC	2
Other	3
Would not refer	2
Total	39

LOCAL FAIR HOUSING**Table 5.G.7****Local Fair Housing**

5. Akron Housing Market Area
2012–2013 Fair Housing Survey for Housing Stakeholders Data

Question	Yes	No	Don't Know	Missing	Total
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Are you aware of any city or county fair housing ordinance, regulation, or plan?	12	8	2	16	38
Are there any specific geographic areas that have fair housing problems?	1	11	9	17	38
Are there any specific groups in that face housing discrimination?	7	7	8	16	38

FAIR HOUSING IN THE PRIVATE SECTOR

Table 5.G.8
Barriers to Fair Housing in the Private Sector
 5. Akron Housing Market Area
 2012–2013 Fair Housing Survey for Housing Stakeholders Data

Question	Yes	No	Don't Know	Missing	Total
Are you aware of any questionable practices or barriers to fair housing choice in:					
The rental housing market?	11	9	6	12	38
The real estate industry?	4	12	8	14	38
The mortgage and home lending industry?	1	12	12	13	38
The housing construction or accessible housing design fields?	4	12	9	13	38
The home insurance industry?	1	12	12	13	38
The home appraisal industry?	1	10	13	14	38
Any other housing services?	1	12	11	14	38

FAIR HOUSING IN THE PUBLIC SECTOR

Table 5.G.9
Barriers to Fair Housing in the Public Sector
 5. Akron Housing Market Area
 2012–2013 Fair Housing Survey for Housing Stakeholders Data

Question	Yes	No	Don't Know	Missing	Total
Are you aware of any questionable practices or barriers to fair housing choice in:					
Land use policies?	6	8	8	16	38
Zoning laws?	5	9	8	16	38
Occupancy standards or health and safety codes?	2	9	11	16	38
Property tax policies?	2	10	10	16	38
Permitting process?	3	6	13	16	38
Housing construction standards?	3	8	11	16	38
Neighborhood or community development policies?	2	8	12	16	38
Limited access to government services, such as employment services?	2	13	7	16	38
Public administrative actions or regulations?	2	10	10	16	38

NARRATIVE COMMENTS

Federal, State, and Local Laws

Table 5.G.10
How did you become aware of fair housing laws?
 5. Akron Housing Market Area
 2013 Fair Housing Survey Data

Comments:
As a landlord, I must know "the rules". Attending meetings with Fair Housing staff. Training from Portage County Regional Planning Been involved with low income housing for 15 years, training in various settings Education From Vince Curry (FHAA) Akron, Ohio about 12 years ago. I am a civil rights attorney specializing in housing law. I am an attorney on the housing team. I am responsible for administering the CDBG/housing programs and ensuring compliance with all applicable regulations, including fair housing requirements. I became familiar with fair housing laws in connection with the housing programs our PHA administers. I did some property management (landlord) - almost all laws are heavily biased toward the tenant. If tenants know the laws, they can game the system and easily get 2 to 3 months free rent before they are thrown out by the sheriff and the owner not only

loses rent but also damages to the property and legal fees. So called "fair" housing doesn't seem to address this side of the equation.

I have worked with the Fair Housing Board and Community Legal Aid with regard to housing issues.

I worked on the update to the County of Summit Analysis of Impediments to Fair Housing Choice

Property Management Training

Read information supplied by local housing authority.

Reasonable Accommodation/Fair Housing and 504 Compliance Office for AMHA

The Akron Area Board of REALTORS sponsors civil rights continuing education classes which are required of real estate licensees every three years. As an organization we're also dedicated to promoting fair housing and equal housing and coordinate activities and educational programs promoting these values.

through job training

through my employment situation

Through my work and multiple trainings on the topic.

Through trade associations such as HBA and Realtors

Table 5.G.11 How should fair housing laws be changed?

5. Akron Housing Market Area
2013 Fair Housing Survey Data

Comments:
According to the U.S. Constitution, every citizen is protected in the buying or leasing of housing. No laws are needed. Follow the U.S. Constitution.
Additional protected classes
As stated above, the laws are extremely biased toward the drags on society. The laws should be changed so that delinquent people face the choice of paying (what they already promised to pay) their rent or moving out within days not months. This would cause these people to get more responsible and serious about their lives and be a better impact on our society (and economy). The way the laws are now, it only encourages irresponsibility.
Expand protected classes in our community
Property owner should have the final say in who he does or does not rent to. Most property owners are only concerned about the color "green" and getting paid on regular basis. Laws force landlords to take renters who may not qualify financially.
Property owners should be able to rent to anyone they wish.....and NOT to anyone they do not wish, without threat by the government. It's a constitutional concept called PRIVATE PROPERTY RIGHTS.
They should be strengthened and the penalties made heavier, especially for municipalities and counties that receive federal funds.

Local Fair Housing

Table 5.G.12

Are there any specific geographic areas that have fair housing problems?

5. Akron Housing Market Area
2013 Fair Housing Survey Data

Comments:
Race discrimination is still a problem in suburban areas. Discrimination against persons with disabilities is still rampant.

Table 5.G.13

Are there any specific groups in that face housing discrimination?

5. Akron Housing Market Area
2013 Fair Housing Survey Data

Comments:
All of the protected classes. Disabled Mental illness mentally ill Persons with disabilities

Table 5.G.14

Please share any additional comments.

5. Akron Housing Market Area
2013 Fair Housing Survey Data

Comments:
<p>Comment on English. Language barrier needs to be addressed during the permitting process. Either they know English or they hire a translator (at their expense, not the counties). If you pander to their specific language during the permitting - and then turn them over to contractors that only speak English - you are setting up an opportunity for failure for both parties. Resisting to assimilate to our common language will only serve to keep that person in a limited socioeconomic class which will not serve them or the community particularly well.</p> <p>Follow the U.S. Constitution</p> <p>The concept of "Fair Housing" sounds good but flies in the face of Liberty and Private Property rights that this nation was founded on. It has gone way too far.</p> <p>This survey is obviously heavily biased. Where are the questions regarding the multitude of problems that landlords continually face?? If this survey even attempted to be even handed it might have been useful in seeing the real big picture of housing concerns - unfortunately this will end up being another biased paper and waste of tax payer money.</p>

Fair Housing in the Private Sector

Table 5.G.15

Are you aware of any questionable practices or barriers to fair housing choice in the rental housing market?

5. Akron Housing Market Area
2013 Fair Housing Survey Data

Comments:
<p>Difficulties faced by persons with disabilities</p> <p>Disability , accommodations</p> <p>I am aware that these things happen, but only from reporting for the agency we contract with for Fair Housing services.</p> <p>Obtaining affordable housing is a barrier to the poor and working poor.</p> <p>Persons with disabilities especially face discriminatory policies put in place by landlords and local governments. I am also aware of local landlords who prefer to deny applications from immigrants and persons on student or work visas.</p> <p>refusal to rent based on disability</p> <p>Refusal to rent to people who are affiliated with the local mental health agency (discrimination based on disability).</p> <p>Though cases I have seen come through our office.</p> <p>We've referred callers to Fair Housing Contact Services based on alleged discrimination for renters in the area of ADA compliance and familial status.</p>

Table 5.G.16**Are you aware of any questionable practices or barriers to fair housing choice in the real estate industry?**5. Akron Housing Market Area
2013 Fair Housing Survey Data**Comments:**

I am aware that these things happen, but only from reporting for the agency we contract with for Fair Housing services.

racial

There are locations where the real estate agents actively work to maintain adult only communities as well as minimize the number of minority families living in the area.

Table 5.G.17**Are you aware of any questionable practices or barriers to fair housing choice in the mortgage and home lending industry?**5. Akron Housing Market Area
2013 Fair Housing Survey Data**Comments:**

I am aware that these things happen, but only from reporting for the agency we contract with for Fair Housing services.

Table 5.G.18**Are you aware of any questionable practices or barriers to fair housing choice in the housing construction or accessible housing design fields?**5. Akron Housing Market Area
2013 Fair Housing Survey Data**Comments:**

all over the place, inaccessibility

Try looking at the housing being built around the University of Akron for compliance with the building code.

Table 5.G.19**Are you aware of any questionable practices or barriers to fair housing choice in any other housing services?**5. Akron Housing Market Area
2013 Fair Housing Survey Data**Comments:**

The City of Akron has reduced its housing inspection program which impacts the minority community the most.

Fair Housing in the Public Sector**Table 5.G.20****Are you aware of any questionable practices or barriers to fair housing choice in land use policies?**5. Akron Housing Market Area
2013 Fair Housing Survey Data**Comments:**

For an example of concentrating housing for persons with disabilities in locations where they will be isolated, look at the development of the Madeline Terrace (name?) being undertaken by the Community Support Services. They will be creating an apartment complex where only people with disabilities will be allowed to live, concentrating them into an area where there are few available alternatives for shopping, recreation, etc. It is all being done to reduce the cost of providing services, rather than trying to integrate people with disabilities into the wider community. It will become a modern day 'ghetto'.

It's known as 'zoning'. It is a practice that has been in existence for a long time. I only have problems with it when the zoning gets changed for crony capitalistic reasons, or when the government, through grants, intrudes on a community.

SOME suburban communities limit densities making it next to impossible to build multi family units without getting a variance, which can be a very dicey procedure.

Table 5.G.21**Are you aware of any questionable practices or barriers to fair housing choice in zoning laws?**

5. Akron Housing Market Area
2013 Fair Housing Survey Data

Comments:
It is becoming less of an issue now Pretty much the same at number 1 The City of Green keeps trying to limit multi-family rental housing as do other communities.

Table 5.G.22**Are you aware of any questionable practices or barriers to fair housing choice in occupancy standards or health and safety codes?**

5. Akron Housing Market Area
2013 Fair Housing Survey Data

Comments:
This is more a matter of selective enforcement. The City of Kent enforces their occupancy standard where they feel students might choose to live.

Table 5.G.23**Are you aware of any questionable practices or barriers to fair housing choice in property tax policies?**

5. Akron Housing Market Area
2013 Fair Housing Survey Data

Comments:
In this area look to where the cities choose to spend their CDBG funds. The biggest need is in the oldest sections of town, which is where the lowest level of public spending occurs. When redevelopment does occur, little attention is given to where the lowest income families will be moved to or the condition of their new housing. Modifications cost the private owner money and yet there are many cases where the person requesting the mods have very little disposable income

Table 5.G.24**Are you aware of any questionable practices or barriers to fair housing choice in the permitting process?**

5. Akron Housing Market Area
2013 Fair Housing Survey Data

Comments:
Ahem....this is America. Those who come here need to assimilate. Offering alternate language documents only serves to delay this process. Barriers are found wherever housing for persons with disabilities is being developed. The language of business in Ohio is English. We don't ask they give up their own practices or religion, but they came to this country and I believe they should assimilate to our language at the very least. What language hosul it be, Spanish? what about the French Itlaian or Serbian, Russian native speaker. It gets ridiculous. It becomes the responsibility of the foreign speaker to get some one that speaks English to translate it for him or her. .

Table 5.G.25**Are you aware of any questionable practices or barriers to fair housing choice in housing construction standards?**

5. Akron Housing Market Area
2013 Fair Housing Survey Data

Comments:
A property owner should be able to construct housing units with a minimum of government intrusion/red tape. There is a widespread failure to enforce the building code in all of its details. What is your definition of accessible housing?

Table 5.G.26**Are you aware of any questionable practices or barriers to fair housing choice in neighborhood or community development policies?**

5. Akron Housing Market Area
2013 Fair Housing Survey Data

Comments:

The lowest income neighborhoods, which most often have the highest concentration of persons in protected classes, get the least amount of monies spent.

Table 5.G.27**Are you aware of any barriers that limit access to government services, such as a lack of transportation or employment services?**

5. Akron Housing Market Area
2013 Fair Housing Survey Data

Comments:

But those public services are all located on bus lines.
no bus routes to many outlying areas of the county

Table 5.G.28**Are you aware of any questionable practices or barriers to fair housing choice in any other public administrative actions or regulations?**

5. Akron Housing Market Area
2013 Fair Housing Survey Data

Comments:

Barberton limits where group homes can go. Not a permitted use in a residential district.
The attitudes of many elected and appointed officials tends to support those with the most money rather than trying to maintain a liveable community for everyone.

H. LAND USE PLANNING SURVEY DATA

This section contains data regarding the potential effects of local land use and housing policies on fair housing choice, as gathered from the Fair Housing Survey for Government Officials.

FAIR HOUSING SURVEY FOR GOVERNMENT OFFICIALS

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 was conducted predominately online. Respondents were solicited by mass-distributed emails sent by the NEOSCC, members of the Progress Review Team, and other various organizations in the 12-county region.

This section contains data gathered from the 23 public sector staff in the Akron Housing Market Area that received and completed the survey.²⁰

²⁰ For areas with both nonentitlement and entitlement communities, the results of the nonentitlement community government official survey and the entitlement community interviews were summed.

Table 5.H.1
Housing Development
 5. Akron Housing Market Area
 2012 Fair Housing Survey for Government Officials Data

Question: Does your jurisdiction have...	Yes	No	Don't Know	Missing	Total
Housing Development					
Definitions for "dwelling unit" or "residential unit"?	14	0	3	6	23
Guidelines that encourage development affordable housing units?	2	11	4	6	23
Any potential barriers to the development of low- to moderate- income housing?	5	10	3	5	23
Guidelines that allow the development of mixed use housing?	10	6	1	6	23
Any potential barriers to the development of mixed use housing?	8	8	1	6	23
Occupancy Standards					
A definition for the term "family"?	10	4	3	6	23
Residential occupancy standards or limits?	5	8	4	6	23
Special Needs Housing					
A definition for the term "disability"?	5	6	5	7	23
Development standards for making housing accessible to persons with disabilities?	0	12	4	7	23
A process by which persons with disabilities can request modification to the jurisdiction's policies?	7	4	5	7	23
Standards for the development of senior housing?	1	12	3	7	23
Guidelines that distinguish senior citizen housing from other residential uses?	2	9	5	7	23
Guidelines for developing housing for any other special needs populations?	4	9	3	7	23
Fair Housing Policies					
A fair housing ordinance, policy, or regulation?	4	7	5	7	23
Policies or practices for "affirmatively furthering fair housing"?	6	6	4	7	23

I. IMPEDIMENTS

The 2013 Northeast Ohio Regional Analysis of Impediments to Fair Housing Choice uncovered several potential issues regarding fair housing in the Akron Housing Market Area. Identification of these items as probable impediments to fair housing choice was based on HUD's definition of impediments as actions, omissions, or decisions that restrict housing choice due to protected class status or actions, omissions, or decisions that have this effect. The identified impediments are supported by evidence uncovered during the Regional AI process, with impediments of higher need being those identified in multiple sources.

These probable impediments in the entirety of the Northeast Ohio Region are presented in **Volumes I and II** of the Regional AI. They are accompanied by suggested actions that jurisdictions in the Region may implement in order to alleviate or eliminate these impediments, and are accompanied by measurable objectives. The goal of these actions and measurable objectives is to assist these agencies in offering greater housing choice for all citizens of the Northeast Ohio Region.

The following list presents the private and public sector impediments found in the Akron Housing Market Area.

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.

IMPEDIMENTS MATRIX

The matrix on the following page includes the impediment, data source, or sources that indicated its existence, protected classes most affected, and ranking of need for action. Level of need for action was determined based on the number of data sources that identified each impediment.

Table 5.I.1
Impediments Matrix
 5. Akron Housing Market Area
 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 ²¹		
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			Disabled persons	L
Public Sector												
1	Lack of sufficient fair housing policies or practices by several units of local government		X					X			All	M
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	All	M
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

²¹ 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.

6. ASHTABULA HOUSING MARKET AREA

A. CENSUS BUREAU DATA

This section contains additional data from the U.S. Census Bureau.

Table 6.A.1

Population by Age

6. Ashtabula Housing Market Area
2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Under 5	6,725	6.5%	6,326	6.2%	-5.9%
5 to 19	22,708	22.1%	20,188	19.9%	-11.1%
20 to 24	5,233	5.1%	5,500	5.4%	5.1%
25 to 34	12,724	12.4%	11,052	10.9%	-13.1%
35 to 54	30,458	29.6%	28,905	28.5%	-5.1%
55 to 64	9,829	9.6%	13,649	13.4%	38.9%
65 or Older	15,051	14.7%	15,877	15.6%	5.5%
Total	102,728	100.0%	101,497	100.0%	-1.2%

Table 6.A.2

Elderly Population by Age

6. Ashtabula Housing Market Area
2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
65 to 66	1,597	10.6%	2,022	12.7%	26.6%
67 to 69	2,356	15.7%	2,869	18.1%	21.8%
70 to 74	3,882	25.8%	3,547	22.3%	-8.6%
75 to 79	3,141	20.9%	2,854	18.0%	-9.1%
80 to 84	2,261	15.0%	2,275	14.3%	.6%
85 or Older	1,814	12.1%	2,310	14.5%	27.3%
Total	15,051	100.0%	15,877	100.0%	5.5%

Table 6.A.3

Population by Race and Ethnicity

6. Ashtabula Housing Market Area
2000 & 2010 Census SF1 Data

Race	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
White	96,635	94.1%	94,041	92.7%	-2.7%
Black	3,247	3.2%	3,586	3.5%	10.4%
American Indian	195	.2%	241	.2%	23.6%
Asian	346	.3%	375	.4%	8.4%
Native Hawaiian/ Pacific Islander	25	.0%	22	.0%	-12.0%
Other	878	.9%	1,086	1.1%	23.7%
Two or More Races	1,402	1.4%	2,146	2.1%	53.1%
Total	102,728	100.0%	101,497	100.0%	-1.2%
Non-Hispanic	100,436	97.8	98,056	96.6%	-2.4%
Hispanic	2,292	2.2%	3,441	3.4%	50.1%

Table 6.A.4**Disability by Age**6. Ashtabula Housing Market Area
2010 Three-Year ACS Data

Age	Male		Female		Total	
	Disabled Population	Disability Rate	Disabled Population	Disability Rate	Disabled Population	Disability Rate
Under 5	0	.0%	60	1.9%	60	1.0%
5 to 17	696	7.8%	491	5.4%	1,187	6.6%
18 to 34	764	8.6%	584	6.3%	1,348	7.4%
35 to 64	3,035	14.7%	3,103	14.9%	6,138	14.8%
65 to 74	1,108	28.9%	994	24.1%	2,102	26.4%
75 or Older	1,340	47.8%	1,903	46.0%	3,243	46.7%
Total	6,943	14.4%	7,135	14.1%	14,078	14.3%

Table 6.A.5**Employment Status by Disability and Type: Age 18 to 64**6. Ashtabula Housing Market Area
2010 Three-Year ACS Data

Disability Status	Population
Employed:	40,315
With a disability:	2,093
With a hearing difficulty	771
With a vision difficulty	600
With a cognitive difficulty	609
With an ambulatory difficulty	846
With a self-care difficulty	317
With an independent living difficulty	511
No disability	38,222
Unemployed:	5,135
With a disability:	428
With a hearing difficulty	112
With a vision difficulty	14
With a cognitive difficulty	329
With an ambulatory difficulty	86
With a self-care difficulty	33
With an independent living difficulty	67
No disability	4,707
Not in labor force:	14,111
With a disability:	4,965
With a hearing difficulty	1,114
With a vision difficulty	1,042
With a cognitive difficulty	2,270
With an ambulatory difficulty	2,912
With a self-care difficulty	1,147
With an independent living difficulty	2,611
No disability	9,146
Total	59,561

Table 6.A.6**Households by Income**

6. Ashtabula Housing Market Area
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	6,836	17.3%	6,325	16.3%
\$15,000 to \$19,999	3,156	8.0%	2,798	7.2%
\$20,000 to \$24,999	3,252	8.2%	2,599	6.7%
\$25,000 to \$34,999	6,132	15.5%	4,671	12.0%
\$35,000 to \$49,999	7,370	18.7%	6,537	16.8%
\$50,000 to \$74,999	7,678	19.5%	8,002	20.6%
\$75,000 to \$99,999	3,082	7.8%	4,184	10.8%
\$100,000 or More	1,931	4.9%	3,795	9.8%
Total	39,437	100.0%	38,911	100.0%

Table 6.A.7**Poverty by Age**

6. Ashtabula Housing Market Area
2000 Census SF3 & 2010 Five-Year ACS Data

Age	2000 Census		2010 Five-Year ACS	
	Persons in Poverty	% of Total	Persons in Poverty	% of Total
Under 6	1,619	13.3%	1,979	12.8%
6 to 17	2,968	24.4%	3,212	20.8%
18 to 64	6,363	52.3%	8,891	57.6%
65 or Older	1,212	10.0%	1,365	8.8%
Total	12,162	100.0%	15,447	100.0%
Poverty Rate	12.1%	.	15.7%	.

Table 6.A.8**Households by Year Home Built**

6. Ashtabula Housing Market Area
2000 Census SF3 & 2010 Five-Year ACS Data

Year Built	2000 Census		2010 Five-Year ACS	
	Households	% of Total	Households	% of Total
1939 or Earlier	12,462	31.6%	12,597	32.4%
1940 to 1949	3,958	10.0%	2,839	7.3%
1950 to 1959	5,581	14.2%	5,280	13.6%
1960 to 1969	4,223	10.7%	3,514	9.0%
1970 to 1979	6,329	16.1%	5,391	13.9%
1980 to 1989	2,704	6.9%	2,259	5.8%
1990 to 1999	4,140	10.5%	4,052	10.4%
2000 to 2004	.	.	2,240	5.8%
2005 or Later	.	.	739	1.9%
Total	39,397	100.0%	38,911	100.0%

Table 6.A.9**Housing Units by Type**6. Ashtabula Housing Market Area
2000 Census SF3 & 2010 Five-Year ACS Data

Unit Type	2000 Census		2010 Five-Year ACS	
	Units	% of Total	Units	% of Total
Single-Family	33,247	75.9%	35,704	77.5%
Duplex	2,189	5.0%	2,009	4.4%
Tri- or Four-Plex	1,436	3.3%	1,534	3.3%
Apartment	2,937	6.7%	3,430	7.4%
Mobile Home	3,912	8.9%	3,359	7.3%
Boat, RV, Van, Etc.	71	.2%	18	.0%
Total	43,792	100.0%	46,054	100.0%

Table 6.A.10**Housing Units by Tenure**6. Ashtabula Housing Market Area
2000 & 2010 Census SF1 Data

Tenure	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
Occupied Housing Units	39,397	90.0%	39,363	85.4%	-.1%
Owner-Occupied	29,188	74.1%	28,269	71.8%	-3.1%
Renter-Occupied	10,209	25.9%	11,094	28.2%	8.7%
Vacant Housing Units	4,395	10.0%	6,736	14.6%	53.3%
Total Housing Units	43,792	100.0%	46,099	100.0%	5.3%

Table 6.A.11**Disposition of Vacant Housing Units**6. Ashtabula Housing Market Area
2000 & 2010 Census SF1 Data

Disposition	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
For Rent	841	19.1%	1,256	18.6%	49.3%
For Sale	538	12.2%	842	12.5%	56.5%
Rented or Sold, Not Occupied	554	12.6%	343	5.1%	-38.1%
For Seasonal, Recreational, or Occasional Use	1,906	43.4%	2,449	36.4%	28.5%
For Migrant Workers	1	0.0%	2	.0%	100.0%
Other Vacant	555	12.6%	1,844	27.4%	232.3%
Total	4,395	100.0%	6,736	100.0%	53.3%

Table 6.A.12**Households by Household Size**6. Ashtabula Housing Market Area
2000 & 2010 Census SF1 Data

Size	2000 Census		2010 Census		% Change 00-10
	Households	% of Total	Households	% of Total	
One Person	9,783	24.8%	10,607	26.9%	8.4%
Two Persons	13,585	34.5%	13,895	35.3%	2.3%
Three Persons	6,561	16.7%	6,206	15.8%	-5.4%
Four Persons	5,585	14.2%	4,799	12.2%	-14.1%
Five Persons	2,452	6.2%	2,315	5.9%	-5.6%
Six Persons	880	2.2%	921	2.3%	4.7%
Seven Persons or More	551	1.4%	620	1.6%	12.5%
Total	39,397	100.0%	39,363	100.0%	-.1%

Table 6.A.13
Household Type by Tenure
 6. Ashtabula Housing Market Area
 2000 & 2010 Census SF1 Data

Household Type	2000 Census		2010 Census		% Change 00–10
	Households	% of Total	Households	% of Total	
Family Households	27,768	70.5%	26,495	67.3%	-4.6%
Married-Couple Family	21,581	77.7%	19,353	73.0%	-10.3%
Owner-Occupied	18,572	86.1%	16,621	85.9%	-10.5%
Renter-Occupied	3,009	13.9%	2,732	14.1%	-9.2%
Other Family	6,187	22.3%	7,142	27.0%	15.4%
Male Householder, No Spouse	1,709	27.6%	2,257	31.6%	32.1%
Owner-Occupied	1,128	66.0%	1,414	62.6%	25.4%
Renter-Occupied	581	34.0%	843	37.4%	45.1%
Female Householder, No Spouse	4,478	72.4%	4,885	68.4%	9.1%
Owner-Occupied	2,438	54.4%	2,462	50.4%	1.0%
Renter-Occupied	2,040	45.6%	2,423	49.6%	18.8%
Non-Family Households	11,629	29.5%	12,868	32.7%	10.7%
Owner-Occupied	7,050	60.6%	7,772	60.4%	10.2%
Renter-Occupied	4,579	39.4%	5,096	39.6%	11.3%
Total	39,397	100.0%	39,363	100.0%	-.1%

Table 6.A.14
Group Quarters Population
 6. Ashtabula Housing Market Area
 2000 & 2010 Census SF1 Data

Group Quarters Type	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Institutionalized					
Correctional Institutions	98	7.3%	1,536	52.1%	1467.3%
Juvenile Facilities	.	.	14	.5%	.
Nursing Homes	1,218	90.2%	1,255	42.5%	3.0%
Other Institutions	35	2.6%	145	4.9%	314.3%
Total	1,351	100.0%	2,950	100.0%	118.4%
Noninstitutionalized					
College Dormitories	0	.0%	0	.0%	.
Military Quarters	0	.0%	0	.0%	.
Other Noninstitutional	414	100.0%	240	100.0%	-42.0%
Total	414	23.5%	240	7.5%	-42.0%
Total Group Quarters Population	1,765	100.0%	3,190	100.0%	80.7%

Table 6.A.15
Overcrowding and Severe Overcrowding
 6. Ashtabula Housing Market Area
 2000 Census SF3 & 2010 Five-Year ACS Data

Data Source	No Overcrowding		Overcrowding		Severe Overcrowding		Total
	Households	% of Total	Households	% of Total	Households	% of Total	
Owner							
2000 Census	28,754	98.5%	322	1.1%	111	.4%	29,187
2010 ACS	27,917	98.6%	328	1.2%	66	.2%	28,311
Renter							
2000 Census	9,881	96.8%	224	2.2%	105	1.0%	10,210
2010 ACS	10,324	97.4%	173	1.6%	103	1.0%	10,600
Total							
2000 Census	38,635	98.1%	546	1.4%	216	.5%	39,397
2010 ACS	38,241	98.3%	501	1.3%	169	.4%	38,911

Table 6.A.16
Households with Incomplete Plumbing Facilities
 6. Ashtabula Housing Market Area
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Plumbing Facilities	39,147	38,597
Lacking Complete Plumbing Facilities	250	314
Total Households	39,397	38,911
Percent Lacking	.6%	.8%

Table 6.A.17
Households with Incomplete Kitchen Facilities
 6. Ashtabula Housing Market Area
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Kitchen Facilities	39,089	38,301
Lacking Complete Kitchen Facilities	308	610
Total Households	39,397	38,911
Percent Lacking	.8%	1.6%

Table 6.A.18
Cost Burden and Severe Cost Burden by Tenure
 6. Ashtabula Housing Market Area
 2000 Census & 2010 Five-Year ACS Data

Data Source	Less Than 30%		31%-50%		Above 50%		Not Computed		Total
	Households	% of Total	Households	% of Total	Households	% of Total	Households	% of Total	
Owner With a Mortgage									
2000 Census	10,309	74.6%	2,344	17.0%	1,128	8.2%	36	.3%	13,817
2010 ACS	12,180	67.1%	3,630	20.0%	2,255	12.4%	91	.5%	18,156
Owner Without a Mortgage									
2000 Census	6,995	89.7%	479	6.1%	195	2.5%	130	1.7%	7,799
2010 ACS	8,388	82.6%	1,085	10.7%	616	6.1%	66	.6%	10,155
Renter									
2000 Census	5,712	58.4%	1,867	19.1%	1,310	13.4%	887	9.1%	9,776
2010 ACS	4,542	42.8%	2,291	21.6%	2,616	24.7%	1,151	10.9%	10,600
Total									
2000 Census	23,016	73.3%	4,690	14.9%	2,633	8.4%	1,053	3.4%	31,392
2010 ACS	25,110	64.5%	7,006	18.0%	5,487	14.1%	1,308	3.4%	38,911

Table 6.A.19
Median Housing Costs
 6. Ashtabula Housing Market Area
 2000 Census SF3 & 2010 Five-Year ACS Data

Housing Cost	2000 Census	2010 ACS
Median Contract Rent	\$374	\$464
Median Home Value	\$85,300	\$118,500

B. BEA DATA

This section contains additional Bureau of Economic Analysis (BEA) data that address employment and income.

Table 6.B.1
Employment by Industry
 6. Ashtabula Housing Market Area
 Select Years 2001–2010 BEA Data

NAICS Categories	2001	2005	2006	2007	2008	2009	2010	% Change 01–10
Farm employment	1,484	1,263	1,242	1,239	1,165	1,173	1,165	-21.5%
Forestry, fishing, related activities, and other	(D) ²²	193	186	200	207	203	207	%
Mining	143	144	182	205	267	255	271	89.5%
Utilities	297	259	252	257	275	263	266	-10.4%
Construction	3,194	3,539	3,380	3,388	3,224	3,116	3,009	-5.8%
Manufacturing	9,917	8,870	8,666	8,068	7,913	6,552	6,752	-31.9%
Wholesale trade	952	995	962	994	973	851	816	-14.3%
Retail trade	5,654	5,979	5,986	5,929	5,698	5,370	5,267	-6.8%
Transportation and warehousing	1,318	1,360	1,481	1,561	1,543	1,574	1,527	15.9%
Information	591	547	532	522	503	456	453	-23.4%
Finance and insurance	1,160	1,085	1,091	1,141	1,200	1,247	1,300	12.1%
Real estate and rental and leasing	1,555	1,775	1,725	1,676	1,645	1,625	1,601	3.0%
Professional and technical services	(D)	(D)	1,338	1,384	1,368	1,305	1,313	%
Management of companies and enterprises	(D)	(D)	207	227	295	195	174	%
Administrative and waste services	1,704	2,166	1,888	1,876	1,930	1,939	2,308	35.4%
Educational services	515	547	503	464	478	486	521	1.2%
Health care and social assistance	5,276	5,762	5,865	6,187	6,346	6,354	6,282	19.1%
Arts, entertainment, and recreation	743	738	728	696	746	682	686	-7.7%
Accommodation and food services	3,201	3,458	3,187	3,154	3,037	2,882	2,937	-8.2%
Other services, except public administration	2,584	2,688	2,700	2,695	2,799	2,744	2,754	6.6%
Government and government enterprises	5,828	5,640	5,605	5,646	5,486	5,384	5,308	-8.9%
Total	47,684	48,449	47,706	47,509	47,098	44,656	44,917	-5.8%

²² (D): These data are not shown to avoid disclosure of confidential information, but estimates are included in the totals.

Table 6.B.2
Real Earnings by Industry
 6. Ashtabula Housing Market Area
 Select Years 2001–2010 BEA Data, Real 2011 Dollars

NAICS Categories	2001	2005	2006	2007	2008	2009	2010	% Change 00–10
Farm earnings	6,192	11,702	8,008	11,266	13,204	13,072	8,153	31.7%
Forestry, fishing, related activities, and other	(D) ²³	3,883	3,957	4,349	3,519	2,766	2,726	.
Mining	3,867	7,346	9,512	9,369	7,141	3,208	3,104	-19.7%
Utilities	26,276	26,715	25,980	25,552	29,587	27,012	27,294	3.9%
Construction	102,336	109,746	101,054	88,995	80,585	88,295	89,356	-12.7%
Manufacturing	520,551	504,773	477,059	443,635	442,539	369,152	393,722	-24.4%
Wholesale trade	39,337	41,294	42,013	45,373	46,109	38,490	37,435	-4.8%
Retail trade	124,548	130,914	129,147	129,102	123,638	120,166	120,140	-3.5%
Transportation and warehousing	66,606	62,510	63,780	64,711	64,255	63,423	62,850	-5.6%
Information	22,712	19,373	18,909	18,474	18,128	17,405	15,915	-29.9%
Finance and insurance	37,894	37,261	36,708	38,280	38,448	34,050	33,843	-10.7%
Real estate and rental and leasing	19,174	13,303	14,243	11,069	15,604	15,964	16,929	-11.7%
Professional and technical services	(D)	(D)	30,546	30,705	33,186	32,448	34,126	.
Management of companies and enterprises	(D)	(D)	6,818	6,635	9,775	9,840	5,915	.
Administrative and waste services	28,052	43,973	35,262	34,831	33,296	32,040	40,509	44.4%
Educational services	6,040	6,269	6,394	6,265	6,449	6,403	6,799	12.6%
Health care and social assistance	188,081	209,481	215,589	222,292	233,086	236,902	231,208	22.9%
Arts, entertainment, and recreation	6,132	5,168	5,136	4,682	4,039	3,762	4,653	-24.1%
Accommodation and food services	44,900	49,609	45,330	47,433	44,329	43,652	44,803	-.2%
Other services, except public administration	71,129	80,226	78,560	76,384	73,953	71,270	73,410	3.2%
Government and government enterprises	263,173	279,433	274,912	271,976	265,757	271,050	268,560	2.0%
Total	1,615,183	1,676,072	1,628,917	1,591,376	1,586,627	1,500,370	1,521,451	-5.8%

²³ (D): These data are not shown to avoid disclosure of confidential information, but estimates are included in the totals.

Table 6.B.3
Real Earnings Per Job by Industry
 6. Ashtabula Housing Market Area
 Select Years 2001–2010 BEA Data, 1,000's of Real 2011 Dollars

NAICS Categories	2001	2005	2006	2007	2008	2009	2010	% Change 00–10
Farm earnings	4,173	9,265	6,447	9,093	11,334	11,144	6,999	67.7%
Forestry, fishing, related activities, and other	(D) ²⁴	20,117	21,272	21,743	17,002	13,624	13,169	.
Mining	27,043	51,012	52,264	45,700	26,745	12,580	11,453	-57.6%
Utilities	88,473	103,145	103,093	99,424	107,590	102,709	102,611	16.0%
Construction	32,040	31,010	29,898	26,268	24,995	28,336	29,696	-7.3%
Manufacturing	52,491	56,908	55,050	54,987	55,926	56,342	58,312	11.1%
Wholesale trade	41,321	41,502	43,673	45,647	47,388	45,229	45,877	11.0%
Retail trade	22,028	21,896	21,575	21,775	21,699	22,377	22,810	3.5%
Transportation and warehousing	50,535	45,963	43,066	41,455	41,643	40,294	41,159	-18.6%
Information	38,429	35,418	35,543	35,390	36,040	38,168	35,132	-8.6%
Finance and insurance	32,667	34,342	33,646	33,550	32,040	27,305	26,033	-20.3%
Real estate and rental and leasing	12,331	7,495	8,257	6,604	9,486	9,824	10,574	-14.2%
Professional and technical services	(D)	(D)	22,829	22,186	24,259	24,864	25,991	.
Management of companies and enterprises	(D)	(D)	32,939	29,227	33,136	50,463	33,992	.
Administrative and waste services	16,462	20,301	18,677	18,567	17,252	16,524	17,551	6.6%
Educational services	11,728	11,460	12,713	13,503	13,491	13,175	13,050	11.3%
Health care and social assistance	35,648	36,356	36,759	35,929	36,730	37,284	36,805	3.2%
Arts, entertainment, and recreation	8,254	7,003	7,055	6,726	5,415	5,515	6,783	-17.8%
Accommodation and food services	14,027	14,346	14,223	15,039	14,596	15,146	15,255	8.8%
Other services, except public administration	27,527	29,846	29,096	28,343	26,421	25,973	26,656	-3.2%
Government and government enterprises	45,157	49,545	49,048	48,171	48,443	50,344	50,595	12.0%
Average	33,873	34,595	34,145	33,496	33,688	33,598	33,872	.00%

²⁴ (D): These data are not shown to avoid disclosure of confidential information, but estimates are included in the totals.

Table 6.B.4
Total Employment and Real Personal Income
 6. Ashtabula Housing Market Area
 1969–2010 BEA Data, 2011 Dollars

Year	1,000s of 2011 Dollars						Per Capita Income	Total Employment	Real Average Earnings Per Job
	Earnings	Social Security Contributions	Residents Adjustments	Dividends, Interest, Rents	Transfer Payments	Personal Income			
1969	1,291,758	93,596	121,525	175,894	144,007	1,639,589	16,785	38,425	33,618
1970	1,270,279	90,477	119,826	184,313	158,010	1,641,951	16,649	38,210	33,245
1971	1,293,772	94,703	125,370	190,962	179,229	1,694,630	16,834	38,309	33,772
1972	1,296,042	98,855	137,545	197,001	192,782	1,724,514	17,103	37,851	34,241
1973	1,384,667	120,198	154,385	207,596	211,013	1,837,463	18,294	39,442	35,106
1974	1,409,001	127,050	162,026	217,580	224,816	1,886,373	18,655	41,011	34,357
1975	1,268,444	110,756	166,267	214,458	268,501	1,806,915	17,713	38,492	32,953
1976	1,349,382	119,221	180,179	214,888	274,193	1,899,421	18,778	39,603	34,073
1977	1,421,851	128,048	192,254	225,351	269,543	1,980,951	19,507	41,200	34,511
1978	1,497,030	137,858	213,052	241,056	273,906	2,087,185	20,364	42,533	35,197
1979	1,508,091	143,390	239,244	256,267	289,477	2,149,689	20,716	41,983	35,921
1980	1,407,305	134,180	239,597	295,700	331,008	2,139,430	20,568	41,272	34,098
1981	1,361,995	137,272	240,962	329,502	343,325	2,138,513	20,763	39,712	34,297
1982	1,235,966	124,869	237,263	340,402	392,879	2,081,641	20,221	37,397	33,050
1983	1,201,559	123,657	246,761	358,940	404,188	2,087,791	20,478	36,954	32,515
1984	1,302,352	137,922	264,985	388,280	397,816	2,215,511	21,852	38,434	33,885
1985	1,303,414	140,682	264,894	394,299	418,213	2,240,138	22,232	38,876	33,527
1986	1,331,644	148,445	258,977	399,851	434,686	2,276,713	22,723	39,580	33,644
1987	1,310,821	146,160	268,842	381,584	439,577	2,254,665	22,577	39,625	33,081
1988	1,311,277	150,905	285,296	382,718	441,375	2,269,761	22,714	39,628	33,090
1989	1,291,136	150,150	307,225	392,919	456,978	2,298,108	23,059	40,489	31,889
1990	1,284,502	150,518	331,844	400,958	485,098	2,351,884	23,521	40,180	31,969
1991	1,271,934	151,388	317,217	372,308	505,628	2,315,698	23,098	40,191	31,647
1992	1,313,354	155,257	336,083	371,569	531,226	2,396,974	23,813	40,586	32,360
1993	1,372,223	163,873	335,046	362,023	544,016	2,449,433	24,230	41,991	32,679
1994	1,446,738	174,562	349,393	377,065	556,857	2,555,491	25,182	43,689	33,114
1995	1,448,835	178,419	362,101	395,805	567,638	2,595,959	25,495	44,713	32,403
1996	1,498,208	181,178	349,835	409,146	592,313	2,668,325	26,127	45,744	32,752
1997	1,511,536	178,793	418,219	447,104	595,402	2,793,468	27,199	46,149	32,753
1998	1,612,496	183,870	406,865	465,041	595,418	2,895,949	28,161	48,096	33,527
1999	1,651,045	186,099	410,999	455,375	608,673	2,939,992	28,600	48,829	33,813
2000	1,624,991	177,952	451,982	462,457	627,108	2,988,587	29,099	49,012	33,155
2001	1,615,183	178,000	445,415	450,785	672,844	3,006,227	29,343	47,684	33,873
2002	1,647,925	175,716	435,619	428,306	708,145	3,044,278	29,678	47,477	34,710
2003	1,670,835	178,422	456,346	407,200	727,231	3,083,190	30,031	47,336	35,297
2004	1,701,843	186,286	446,510	359,545	742,779	3,064,391	29,853	48,266	35,260
2005	1,676,072	187,117	452,772	331,626	760,843	3,034,196	29,562	48,449	34,595
2006	1,628,917	184,432	455,042	343,933	773,151	3,016,611	29,476	47,706	34,145
2007	1,591,376	181,987	451,663	383,942	803,008	3,048,002	29,837	47,509	33,496
2008	1,586,627	187,651	436,660	418,670	844,533	3,098,840	30,433	47,098	33,688
2009	1,500,370	182,513	382,406	337,625	951,603	2,989,491	29,429	44,656	33,598
2010	1,521,451	186,092	400,826	342,661	972,801	3,051,648	30,075	44,917	33,872

C. BLS DATA

This section contains Bureau of Labor Statistics (BLS) data that address employment and income.

Table 6.C.1
Labor Force Statistics
 6. Ashtabula Housing Market Area
 1990–2011 BLS Data

Year	Labor Force	Employment	Unemployment	Unemployment Rate	Statewide Unemployment Rate
1990	45,523	42,054	3,469	7.6%	5.7%
1991	45,447	41,352	4,095	9.0%	6.6%
1992	45,754	41,156	4,598	10.0%	7.4%
1993	45,248	41,313	3,935	8.7%	6.7%
1994	45,902	42,224	3,678	8.0%	5.6%
1995	45,599	42,458	3,141	6.9%	4.9%
1996	46,493	43,086	3,407	7.3%	5.0%
1997	46,713	43,798	2,915	6.2%	4.6%
1998	47,138	44,107	3,031	6.4%	4.3%
1999	47,184	44,403	2,781	5.9%	4.3%
2000	50,545	48,105	2,440	4.8%	4.0%
2001	49,544	46,567	2,977	6.0%	4.4%
2002	50,483	46,777	3,706	7.3%	5.7%
2003	50,097	46,200	3,897	7.8%	6.2%
2004	50,042	46,421	3,621	7.2%	6.1%
2005	50,344	46,775	3,569	7.1%	5.9%
2006	49,641	46,381	3,260	6.6%	5.4%
2007	49,217	45,799	3,418	6.9%	5.6%
2008	48,661	44,790	3,871	8.0%	6.5%
2009	48,571	42,139	6,432	13.2%	10.1%
2010	48,457	42,358	6,099	12.6%	10.0%
2011	47,509	42,454	5,055	10.6%	8.6%

D. HMDA DATA

The Home Mortgage Disclosure Act (HMDA) requires both depository and non-depository lenders to collect and publicly disclose information about housing-related loans and loan applications.²⁵ The information presented in this section presents detailed HMDA data, including denial rates and predatory lending including high annual percentage rate (APR) loans.

Table 6.D.1

Purpose of Loan by Year
6. Ashtabula Housing Market Area
2004–2011 HMDA Data

Purpose	2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	2,367	2,939	2,824	1,876	1,231	1,042	978	1,093	14,350
Home Improvement	875	1,129	1,109	866	487	291	251	281	5,289
Refinancing	6,532	6,399	5,658	3,763	2,542	2,370	2,056	2,016	31,336
Total	9,774	10,467	9,591	6,505	4,260	3,703	3,285	3,390	50,975

Table 6.D.2

Occupancy Status for Home Purchase Loan Applications
6. Ashtabula Housing Market Area
2004–2011 HMDA Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	Total
Owner-Occupied	2,072	2,566	2,460	1,563	1,085	949	875	981	12,551
Not Owner-Occupied	192	296	272	220	128	79	96	108	1,391
Not Applicable	103	77	92	93	18	14	7	4	408
Total	2,367	2,939	2,824	1,876	1,231	1,042	978	1,093	14,350

Table 6.D.3

Owner-Occupied Home Purchase Loan Applications by Loan Type
6. Ashtabula Housing Market Area
2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Conventional	1,696	2,260	2,116	1,207	449	261	240	393	8,622
FHA - Insured	302	231	294	289	500	469	420	346	2,851
VA - Guaranteed	33	44	32	38	43	45	51	57	343
Rural Housing Service or Farm Service Agency	41	31	18	29	93	174	164	185	735
Total	2,072	2,566	2,460	1,563	1,085	949	875	981	12,551

²⁵ Data are considered “raw” because they contain entry errors and incomplete loan applications. Starting in 2004, the HMDA data made substantive changes in reporting. It modified the way it handled Hispanic data, loan interest rates, and the reporting of multifamily loan applications.

DENIAL RATES

Table 6.D.4
Loan Applications by Action Taken
 6. Ashtabula Housing Market Area
 2004–2011 HMDA Data

Action	2004	2005	2006	2007	2008	2009	2010	2011	Total
Loan Originated	1,046	1,279	1,136	797	530	389	371	459	6,007
Application Approved but not Accepted	126	172	157	82	51	35	15	25	663
Application Denied	307	390	394	252	172	130	114	115	1,874
Application Withdrawn by Applicant	159	173	144	88	63	40	43	58	768
File Closed for Incompleteness	34	61	50	20	14	10	9	7	205
Loan Purchased by the Institution	400	489	577	323	255	345	323	317	3,029
Preapproval Request Denied	0	2	2	1	0	0	0	0	5
Preapproval Approved but not Accepted	0	0	0	0	0	0	0	0	0
Total	2,072	2,566	2,460	1,563	1,085	949	875	981	12,551
Denial Rate	22.7%	23.4%	25.8%	24.0%	24.5%	25.0%	23.5%	20.0%	23.8%

Table 6.D.5
Denial Rates by Gender of Applicant
 6. Ashtabula Housing Market Area
 2004–2011 HMDA Data

Year	Male	Female	Not Available	Not Applicable	Average
2004	20.0%	25.6%	41.0%	%	22.7%
2005	21.6%	28.1%	22.6%	%	23.4%
2006	24.8%	26.9%	32.5%	%	25.8%
2007	20.7%	28.5%	39.0%	%	24.0%
2008	24.5%	21.3%	50.0%	%	24.5%
2009	23.5%	25.5%	50.0%	%	25.0%
2010	23.0%	21.2%	38.7%	%	23.5%
2011	19.0%	16.2%	50.0%	100.0%	20.0%
Average	22.1%	25.5%	35.9%	100.0%	23.8%

Table 6.D.6
Loan Applications by Selected Action Taken by Gender of Applicant
 6. Ashtabula Housing Market Area
 2004–2011 HMDA Data

Gender		2004	2005	2006	2007	2008	2009	2010	2011	Total
Male	Originated	735	885	778	540	363	277	248	336	4,162
	Denied	184	244	256	141	118	85	74	79	1,181
	Denial Rate	20.0%	21.6%	24.8%	20.7%	24.5%	23.5%	23.0%	19.0%	22.1%
Female	Originated	265	312	302	221	155	102	104	109	1,570
	Denied	91	122	111	88	42	35	28	21	538
	Denial Rate	25.6%	28.1%	26.9%	28.5%	21.3%	25.5%	21.2%	16.2%	25.5%
Not Available	Originated	46	82	56	36	12	10	19	14	275
	Denied	32	24	27	23	12	10	12	14	154
	Denial Rate	41.0%	22.6%	32.5%	39.0%	50.0%	50.0%	38.7%	50.0%	35.9%
Not Applicable	Originated	0	0	0	0	0	0	0	0	0
	Denied	0	0	0	0	0	0	0	1	1
	Denial Rate	%	%	%	%	%	%	%	100.0%	100.0%
Total	Originated	1,046	1,279	1,136	797	530	389	371	459	6,007
	Denied	307	390	394	252	172	130	114	115	1,874
	Denial Rate	22.7%	23.4%	25.8%	24.0%	24.5%	25.0%	23.5%	20.0%	23.8%

Table 6.D.7
Denial Rates by Race/Ethnicity of Applicant
 6. Ashtabula Housing Market Area
 2004–2011 HMDA Data

Race/Ethnicity	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	80.0%	50.0%	100.0%	50.0%	66.7%	.0%	.0%	.0%	46.4%
Asian	41.7%	9.1%	71.4%	28.6%	.0%	100.0%	.0%	%	35.6%
Black	41.7%	30.8%	44.4%	27.3%	28.6%	100.0%	20.0%	50.0%	37.2%
White	20.3%	23.1%	23.8%	22.1%	22.7%	23.6%	22.2%	18.1%	22.2%
Not Available	37.8%	24.5%	37.2%	41.8%	40.0%	38.5%	39.1%	40.0%	34.9%
Not Applicable	.0%	%	%	%	%	0%	0%	100.0%	50.0%
Average	22.7%	23.4%	25.8%	24.0%	24.5%	25.0%	23.5%	20.0%	23.8%
Non-Hispanic	21.0%	22.9%	24.4%	21.8%	23.1%	24.4%	21.8%	17.7%	22.4%
Hispanic	20.0%	33.3%	38.7%	44.4%	22.2%	20.0%	14.3%	42.9%	30.1%

Table 6.D.8
Loan Applications by Selected Action Taken by Race/Ethnicity of Applicant
 6. Ashtabula Housing Market Area
 2004–2011 HMDA Data

Race		2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Originated	1	3	0	1	2	1	4	3	15
	Denied	4	3	1	1	4	0	0	0	13
	Denial Rate	80.0%	50.0%	100.0%	50.0%	66.7%	.0%	.0%	.0%	46.4%
Asian	Originated	7	10	2	5	4	0	1	0	29
	Denied	5	1	5	2	0	3	0	0	16
	Denial Rate	41.7%	9.1%	71.4%	28.6%	.0%	100.0%	.0%	%	35.6%
Black	Originated	14	18	20	16	5	0	8	5	86
	Denied	10	8	16	6	2	2	2	5	51
	Denial Rate	41.7%	30.8%	44.4%	27.3%	28.6%	100.0%	20.0%	50.0%	37.2%
White	Originated	944	1,097	1,028	722	483	372	330	430	5,406
	Denied	240	329	321	205	142	115	94	95	1,541
	Denial Rate	20.3%	23.1%	23.8%	22.1%	22.7%	23.6%	22.2%	18.1%	22.2%
Not Available	Originated	79	151	86	53	36	16	28	21	470
	Denied	48	49	51	38	24	10	18	14	252
	Denial Rate	37.8%	24.5%	37.2%	41.8%	40.0%	38.5%	39.1%	40.0%	34.9%
Not Applicable	Originated	1	0	0	0	0	0	0	0	1
	Denied	0	0	0	0	0	0	0	1	1
	Denial Rate	37.8%	24.5%	37.2%	41.8%	40.0%	38.5%	39.1%	40.0%	50.0%
Total	Originated	1,046	1,279	1,136	797	530	389	371	459	6,007
	Denied	307	390	394	252	172	130	114	115	1,874
	Denial Rate	22.7%	23.4%	25.8%	24.0%	24.5%	25.0%	23.5%	20.0%	23.8%
Non-Hispanic	Originated	844	1,096	1,033	737	483	357	338	432	5,320
	Denied	224	325	333	205	145	115	94	93	1,534
	Denial Rate	21.0%	22.9%	24.4%	21.8%	23.1%	24.4%	21.8%	17.7%	22.4%
Hispanic	Originated	24	18	19	10	14	12	6	4	107
	Denied	6	9	12	8	4	3	1	3	46
	Denial Rate	20.0%	33.3%	38.7%	44.4%	22.2%	20.0%	14.3%	42.9%	30.1%

Table 6.D.9
Loan Applications by Reason for Denial
 6. Ashtabula Housing Market Area
 2004–2011 HMDA Data

Denial Reason	2004	2005	2006	2007	2008	2009	2010	2011	Total
Debt-to-Income Ratio	34	58	43	31	22	21	18	16	243
Employment History	1	7	6	2	2	2	2	1	23
Credit History	67	87	81	46	37	38	43	22	421
Collateral	30	39	43	28	35	32	19	39	265
Insufficient Cash	11	5	12	2	2	0	1	1	34
Unverifiable Information	5	9	8	5	8	1	4	4	44
Credit Application Incomplete	31	15	28	21	14	5	5	4	123
Mortgage Insurance Denied	0	0	0	0	0	2	0	0	2
Other	54	69	48	34	9	8	9	8	239
Missing	74	101	125	83	43	21	13	20	480
Total	307	390	394	252	172	130	114	115	1,874

Table 6.D.10
Denial Rates by Income of Applicant
 6. Ashtabula Housing Market Area
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	78.6%	59.4%	43.3%	47.1%	60.0%	69.2%	40.0%	57.1%	56.7%
\$15,001–\$30,000	28.9%	29.0%	33.3%	33.5%	33.3%	25.0%	29.8%	21.7%	30.0%
\$30,001–\$45,000	20.9%	23.5%	25.3%	22.6%	22.4%	21.3%	22.1%	20.8%	22.8%
\$45,001–\$60,000	19.3%	21.4%	23.2%	23.1%	21.8%	22.8%	20.4%	19.2%	21.5%
\$60,001–\$75,000	18.8%	18.9%	22.0%	19.7%	19.2%	26.7%	12.5%	14.9%	19.4%
Above \$75,000	10.6%	14.9%	18.0%	15.3%	18.5%	25.7%	20.6%	17.1%	16.6%
Data Missing	31.1%	32.4%	35.1%	33.3%	.0%	60.0%	57.1%	50.0%	35.1%
Total	22.7%	23.4%	25.8%	24.0%	24.5%	25.0%	23.5%	20.0%	23.8%

Table 6.D.11
Denial Rates of Loans by Race/Ethnicity and Income of Applicant
 6. Ashtabula Housing Market Area
 2004–2011 HMDA Data

Race	<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	Above \$75K	Data Missing	Average
American Indian	100.0%	55.6%	40.0%	50.0%	50.0%	16.7%	100.0%	46.4%
Asian	.0%	50.0%	33.3%	21.4%	50.0%	50.0%	%	35.6%
Black	83.3%	46.7%	27.3%	40.6%	21.4%	29.4%	40.0%	37.2%
White	57.6%	28.3%	21.7%	19.4%	18.3%	15.2%	26.1%	22.2%
Not Available	41.2%	42.0%	33.2%	35.4%	26.7%	23.9%	81.0%	34.9%
Not Applicable	%	%	%	%	%	%	50.0%	50.0%
Average	56.7%	30.0%	22.8%	21.5%	19.4%	16.6%	35.1%	23.8%
Non-Hispanic Ethnicity	57.7%	28.6%	21.8%	19.8%	19.0%	15.3%	25.0%	22.4%
Hispanic (Ethnicity)	57.1%	38.5%	16.1%	22.2%	11.8%	71.4%	66.7%	30.1%

Table 6.D.12
Loan Applications by Reason for Denial by Race/Ethnicity of Applicant
 6. Ashtabula Housing Market Area
 2004–2011 HMDA Data

Denial Reason	American Indian	Asian	Black	White	Not Available	Not Applicable	Total	Hispanic (Ethnicity)
Debt-to-Income Ratio	2	2	8	206	25	0	243	7
Employment History	0	1	0	22	0	0	23	2
Credit History	2	5	16	354	44	0	421	16
Collateral	1	1	5	223	35	0	265	2
Insufficient Cash	0	0	0	32	2	0	34	0
Unverifiable Information	1	0	1	30	12	0	44	2
Credit Application Incomplete	2	0	1	105	15	0	123	7
Mortgage Insurance Denied	0	0	0	2	0	0	2	0
Other	0	0	7	198	33	1	239	2
Missing	5	7	13	369	86	0	480	8
Total	13	16	51	1,541	252	1	1,874	46
% Missing	38.5%	43.8%	25.5%	23.9%	34.1%	.0%	25.6%	17.4%

Table 6.D.13
Loan Applications by Income of Applicant: Originated and Denied
 6. Ashtabula Housing Market Area
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Loan Originated	6	13	17	9	4	4	12	3	68
	Application Denied	22	19	13	8	6	9	8	4	89
	Denial Rate	78.6%	59.4%	43.3%	47.1%	60.0%	69.2%	40.0%	57.1%	56.7%
\$15,001–\$30,000	Loan Originated	224	238	206	145	112	87	73	94	1,179
	Application Denied	91	97	103	73	56	29	31	26	506
	Denial Rate	28.9%	29.0%	33.3%	33.5%	33.3%	25.0%	29.8%	21.7%	30.0%
\$30,001–\$45,000	Loan Originated	317	377	361	240	152	140	113	118	1,818
	Application Denied	84	116	122	70	44	38	32	31	537
	Denial Rate	20.9%	23.5%	25.3%	22.6%	22.4%	21.3%	22.1%	20.8%	22.8%
\$45,001–\$60,000	Loan Originated	221	291	232	160	122	71	74	97	1,268
	Application Denied	53	79	70	48	34	21	19	23	347
	Denial Rate	19.3%	21.4%	23.2%	23.1%	21.8%	22.8%	20.4%	19.2%	21.5%
\$60,001–\$75,000	Loan Originated	121	154	128	102	63	33	42	57	700
	Application Denied	28	36	36	25	15	12	6	10	168
	Denial Rate	18.8%	18.9%	22.0%	19.7%	19.2%	26.7%	12.5%	14.9%	19.4%
Above \$75,000	Loan Originated	126	183	168	133	75	52	54	87	878
	Application Denied	15	32	37	24	17	18	14	18	175
	Denial Rate	10.6%	14.9%	18.0%	15.3%	18.5%	25.7%	20.6%	17.1%	16.6%
Data Missing	Loan Originated	31	23	24	8	2	2	3	3	96
	Application Denied	14	11	13	4	0	3	4	3	52
	Denial Rate	31.1%	32.4%	35.1%	33.3%	.0%	60.0%	57.1%	50.0%	35.1%
Total	Loan Originated	1,046	1,279	1,136	797	530	389	371	459	6,007
	Application Denied	307	390	394	252	172	130	114	115	1,874
	Denial Rate	22.7%	23.4%	25.8%	24.0%	24.5%	25.0%	23.5%	20.0%	23.8%

Table 6.D.14
Loan Applications by Income and Race/Ethnicity of Applicant: Originated and Denied
 6. Ashtabula Housing Market Area
 2004–2011 HMDA Data

Race		<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	> \$75K	Data Missing	Total
American Indian	Loan Originated	0	4	3	1	2	5	0	15
	Application Denied	1	5	2	1	2	1	1	13
	Denial Rate	100.0%	55.6%	40.0%	50.0%	50.0%	16.7%	100.0%	46.4%
Asian	Loan Originated	1	3	8	11	2	4	0	29
	Application Denied	0	3	4	3	2	4	0	16
	Denial Rate	.0%	50.0%	33.3%	21.4%	50.0%	50.0%	%	35.6%
Black	Loan Originated	1	16	24	19	11	12	3	86
	Application Denied	5	14	9	13	3	5	2	51
	Denial Rate	83.3%	46.7%	27.3%	40.6%	21.4%	29.4%	40.0%	37.2%
White	Loan Originated	56	1,073	1,652	1,133	630	774	88	5,406
	Application Denied	76	424	457	273	141	139	31	1,541
	Denial Rate	57.6%	28.3%	21.7%	19.4%	18.3%	15.2%	26.1%	22.2%
Not Available	Loan Originated	10	83	131	104	55	83	4	470
	Application Denied	7	60	65	57	20	26	17	252
	Denial Rate	41.2%	42.0%	33.2%	35.4%	26.7%	23.9%	81.0%	34.9%
Not Applicable	Loan Originated	0	0	0	0	0	0	1	1
	Application Denied	0	0	0	0	0	0	1	1
	Denial Rate	%	%	%	%	%	%	50.0%	50.0%
Total	Loan Originated	68	1,179	1,818	1,268	700	878	96	6,007
	Application Denied	89	506	537	347	168	175	52	1,874
	Denial Rate	56.7%	30.0%	22.8%	21.5%	19.4%	16.6%	35.1%	23.8%
Non-Hispanic Ethnicity	Loan Originated	55	1,042	1,611	1,121	623	778	90	5,320
	Application Denied	75	417	449	277	146	140	30	1,534
	Denial Rate	57.7%	28.6%	21.8%	19.8%	19.0%	15.3%	25.0%	22.4%
Hispanic (Ethnicity)	Loan Originated	3	32	26	28	15	2	1	107
	Application Denied	4	20	5	8	2	5	2	46
	Denial Rate	57.1%	38.5%	16.1%	22.2%	11.8%	71.4%	66.7%	30.1%

PREDATORY LENDING

Table 6.D.15
Originated Owner-Occupied Loans by HAL Status
 6. Ashtabula Housing Market Area
 2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Other	825	824	756	612	446	352	362	453	4,630
HAL	221	455	380	185	84	37	9	6	1,377
Total	1,046	1,279	1,136	797	530	389	371	459	6,007
Percent HAL	21.1%	35.6%	33.5%	23.2%	15.8%	9.5%	2.4%	1.3%	22.9%

Table 6.D.16
Loans by Loan Purpose by HAL Status
 6. Ashtabula Housing Market Area
 2004–2011 HMDA Data

Loan Purpose		2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	Other	825	824	756	612	446	352	362	453	4,630
	HAL	221	455	380	185	84	37	9	6	1,377
	Percent HAL	21.1%	35.6%	33.5%	23.2%	15.8%	9.5%	2.4%	1.3%	22.9%
Home Improvement	Other	239	237	342	200	92	49	59	87	1,305
	HAL	79	115	98	91	48	18	13	7	469
	Percent HAL	24.8%	32.7%	22.3%	31.3%	34.3%	26.9%	18.1%	7.4%	26.4%
Refinancing	Other	1,389	1,078	909	708	508	679	693	698	6,662
	HAL	527	613	587	246	174	71	11	20	2,249
	Percent HAL	27.5%	36.3%	39.2%	25.8%	25.5%	9.5%	1.6%	2.8%	25.2%
Total	Other	2,453	2,139	2,007	1,520	1,046	1,080	1,114	1,238	12,597
	HAL	827	1,183	1,065	522	84	37	9	6	4,095
	Percent HAL	25.2%	35.6%	34.7%	25.6%	22.6%	10.4%	2.9%	2.6%	24.5%

Table 6.D.17
HALs Originated by Race of Borrower
 6. Ashtabula Housing Market Area
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	0	1	0	0	0	0	0	0	1
Asian	1	6	1	3	0	0	0	0	11
Black	5	8	12	1	0	0	0	0	26
White	189	376	336	169	71	35	9	6	1,191
Not Available	26	64	31	12	13	2	0	0	148
Not Applicable	0	0	0	0	0	0	0	0	0
Total	221	455	380	185	84	37	9	6	1,377
Hispanic (Ethnicity)	9	8	8	3	1	1	0	0	30

Table 6.D.18
Rate of HALs Originated by Race/Ethnicity of Borrower
 6. Ashtabula Housing Market Area
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	.0%	33.3%	%	.0%	.0%	.0%	.0%	.0%	6.7%
Asian	14.3%	60.0%	50.0%	60.0%	.0%	%	.0%	%	37.9%
Black	35.7%	44.4%	60.0%	6.3%	.0%	%	.0%	.0%	30.2%
White	20.0%	34.3%	32.7%	23.4%	14.7%	9.4%	2.7%	1.4%	22.0%
Not Available	32.9%	42.4%	36.0%	22.6%	36.1%	12.5%	.0%	.0%	31.5%
Not Applicable	.0%	%	%	%	%	%	%	%	0%
Average	21.1%	35.6%	33.5%	23.2%	15.8%	9.5%	02.4%	01.3%	22.9%
Non-Hispanic Ethnicity	20.4%	34.2%	32.9%	23.2%	15.1%	9.5%	2.7%	1.2%	22.2%
Hispanic (Ethnicity)	37.5%	44.4%	42.1%	30.0%	7.1%	8.3%	.0%	.0%	28.0%

Table 6.D.19
Loans by HAL Status by Race/Ethnicity of Borrower
 6. Ashtabula Housing Market Area
 2004–2011 HMDA Data

Race	Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Other	1	2	0	1	2	1	4	3	14
	HAL	0	1	0	0	0	0	0	0	1
	Percent HAL	.0%	33.3%	%	.0%	.0%	.0%	.0%	.0%	6.7%
Asian	Other	6	4	1	2	4	0	1	0	18
	HAL	1	6	1	3	0	0	0	0	11
	Percent HAL	14.3%	60.0%	50.0%	60.0%	.0%	%	.0%	%	37.9%
Black	Other	9	10	8	15	5	0	8	5	60
	HAL	5	8	12	1	0	0	0	0	26
	Percent HAL	35.7%	44.4%	60.0%	6.3%	.0%	%	.0%	.0%	30.2%
White	Other	755	721	692	553	412	337	321	424	4,215
	HAL	189	376	336	169	71	35	9	6	1,191
	Percent HAL	20.0%	34.3%	32.7%	23.4%	14.7%	9.4%	02.7%	01.4%	22.0%
Not Available	Other	53	87	55	41	23	14	28	21	322
	HAL	26	64	31	12	13	2	0	0	148
	Percent HAL	32.9%	42.4%	36.0%	22.6%	36.1%	12.5%	.0%	.0%	31.5%
Not Applicable	Other	1	0	0	0	0	0	0	0	1
	HAL	0	0	0	0	0	0	0	0	0
	Percent HAL	.0%	%	%	%	%	%	%	%	0.0%
Total	Other	825	824	756	612	446	352	362	453	4,630
	HAL	221	455	380	185	84	37	9	6	1,377
	Percent HAL	21.1%	35.6%	33.5%	23.2%	15.8%	9.5%	2.4%	1.3%	22.9%
Non-Hispanic Ethnicity	Other	672	721	693	566	410	323	329	427	4,141
	HAL	172	375	340	171	73	34	9	5	1,179
	Percent HAL	20.4%	34.2%	32.9%	23.2%	15.1%	9.5%	2.7%	1.2%	22.2%
Hispanic (Ethnicity)	Other	15	10	11	7	13	11	6	4	77
	HAL	9	8	8	3	1	1	0	0	30
	Percent HAL	37.5%	44.4%	42.1%	30.0%	7.1%	8.3%	.0%	.0%	28.0%

Table 6.D.20
Rates of HALs by Income of Borrower
 6. Ashtabula Housing Market Area
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Average
\$15,000 or Below	66.7%	15.4%	41.2%	44.4%	25.0%	.0%	16.7%	.0%	29.4%
\$15,001–\$30,000	29.0%	44.5%	38.3%	29.0%	20.5%	13.8%	4.1%	3.2%	28.2%
\$30,001–\$45,000	23.0%	34.7%	38.0%	29.6%	18.4%	11.4%	2.7%	.8%	25.3%
\$45,001–\$60,000	19.5%	39.2%	30.6%	19.4%	11.5%	8.5%	.0%	.0%	22.0%
\$60,001–\$75,000	18.2%	31.2%	29.7%	13.7%	15.9%	3.0%	.0%	1.8%	19.1%
Above \$75,000	10.3%	25.1%	21.4%	15.0%	10.7%	3.8%	0.0%	1.1%	14.4%
Data Missing	3.2%	34.8%	50.0%	37.5%	.0%	.0%	33.3%	.0%	26.0%
Average	21.1%	35.6%	33.5%	23.2%	15.8%	9.5%	2.4%	1.3%	22.9%

Table 6.D.21
Loans by HAL Status by Income of Borrower
 6. Ashtabula Housing Market Area
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Other	2	11	10	5	3	4	10	3	48
	HAL	4	2	7	4	1	0	2	0	20
	Percent HAL	66.7%	15.4%	41.2%	44.4%	25.0%	.0%	16.7%	.0%	29.4%
\$15,001–\$30,000	Other	159	132	127	103	89	75	70	91	846
	HAL	65	106	79	42	23	12	3	3	333
	Percent HAL	29.0%	44.5%	38.3%	29.0%	20.5%	13.8%	4.1%	3.2%	28.2%
\$30,001–\$45,000	Other	244	246	224	169	124	124	110	117	1,358
	HAL	73	131	137	71	28	16	3	1	460
	Percent HAL	23.0%	34.7%	38.0%	29.6%	18.4%	11.4%	2.7%	.8%	25.3%
\$45,001–\$60,000	Other	178	177	161	129	108	65	74	97	989
	HAL	43	114	71	31	14	6	0	0	279
	Percent HAL	19.5%	39.2%	30.6%	19.4%	11.5%	8.5%	.0%	.0%	22.0%
\$60,001–\$75,000	Other	99	106	90	88	53	32	42	56	566
	HAL	22	48	38	14	10	1	0	1	134
	Percent HAL	18.2%	31.2%	29.7%	13.7%	15.9%	3.0%	.0%	1.8%	19.1%
Above \$75,000	Other	113	137	132	113	67	50	54	86	752
	HAL	13	46	36	20	8	2	0	1	126
	Percent HAL	10.3%	25.1%	21.4%	15.0%	10.7%	3.8%	.0%	1.1%	14.4%
Data Missing	Other	30	15	12	5	2	2	2	3	71
	HAL	1	8	12	3	0	0	1	0	25
	Percent HAL	3.2%	34.8%	50.0%	37.5%	.0%	.0%	33.3%	.0%	26.0%
Total	Other	825	824	756	612	446	352	362	453	4,630
	HAL	221	455	380	185	84	37	9	6	1,377
	Percent HAL	21.1%	35.6%	33.5%	23.2%	15.8%	9.5%	2.4%	1.3%	22.9%

E. CRA DATA

Additional data tables related to Community Reinvestment Act (CRA) data are presented in this section.

Table 6.E.1
Small Business Loans Originated: \$100,000 or Less by Tract MFI
 6. Ashtabula Housing Market Area
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	33	439	513			985
2001	50	620	787			1,457
2002	58	770	973			1,801
2003	48	426	1,355			1,829
2004		239	1,555			1,794
2005		223	1,663			1,886
2006		268	1,890			2,158
2007		285	2,158			2,443
2008		184	1,621			1,805
2009		99	613			712
2010		75	527			602
2011		102	699			801
Total	189	3,730	14,354	0	0	18,273
Loan Amount (\$1,000s)						
2000	456	6,460	7,392			14,308
2001	666	6,101	8,760			15,527
2002	628	7,314	8,655			16,597
2003	743	4,406	13,038			18,187
2004		1,906	13,708			15,614
2005		2,302	16,230			18,532
2006		2,334	18,035			20,369
2007		2,824	19,407			22,231
2008		1,671	13,433			15,104
2009		1,332	7,479			8,811
2010		1,266	6,868			8,134
2011		1,606	8,543			10,149
Total	2,493	39,522	141,548	0	0	183,563

Table 6.E.2
Small Business Loans Originated: \$100,001 to \$250,000 by Tract MFI
 6. Ashtabula Housing Market Area
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	3	25	21			49
2001	2	33	25			60
2002	3	36	34			73
2003	2	10	40			52
2004		11	37			48
2005		19	45			64
2006		15	42			57
2007		5	37			42
2008		4	22			26
2009		6	13			19
2010		6	34			40
2011		2	26			28
Total	10	172	376	0	0	558
Loan Amount (\$1,000s)						
2000	420	4,137	3,508			8,065
2001	330	5,386	4,613			10,329
2002	543	5,893	5,791			12,227
2003	311	1,735	6,646			8,692
2004		2,295	6,392			8,687
2005		3,275	7,449			10,724
2006		2,600	6,973			9,573
2007		860	6,067			6,927
2008		646	3,957			4,603
2009		1,035	2,351			3,386
2010		1,169	6,319			7,488
2011		295	4,143			4,438
Total	1,604	29,326	64,209	0	0	95,139

Table 6.E.3
Small Business Loans Originated: More than \$250,000 by Tract MFI
 6. Ashtabula Housing Market Area
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	0	8	13			21
2001	3	11	18			32
2002	4	17	28			49
2003	0	11	28			39
2004		6	33			39
2005		11	46			57
2006		7	35			42
2007		4	21			25
2008		6	22			28
2009		5	12			17
2010		3	22			25
2011		6	24			30
Total	7	95	302	0	0	404
Loan Amount (\$1,000s)						
2000	0	4,188	7,161			11,349
2001	1,111	5,929	9,818			16,858
2002	1,934	9,902	14,261			26,097
2003	0	6,356	15,093			21,449
2004		2,504	17,103			19,607
2005		6,518	24,927			31,445
2006		4,430	21,599			26,029
2007		2,800	12,619			15,419
2008		3,520	12,143			15,663
2009		3,127	6,156			9,283
2010		1,839	11,363			13,202
2011		3,470	13,915			17,385
Total	3,045	54,583	166,158	0	0	223,786

Table 6.E.4
Small Business Loans to Businesses with Gross Annual Revenues of Less Than \$1 Million by Tract MFI
 6. Ashtabula Housing Market Area
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	20	219	277			516
2001	16	253	292			561
2002	14	205	223			442
2003	14	151	414			579
2004		85	523			608
2005		133	840			973
2006		98	817			915
2007		140	925			1,065
2008		63	586			649
2009		54	256			310
2010		35	203			238
2011		54	333			387
Total	64	1,490	5,689	0	0	7,243
Loan Amount (\$1,000s)						
2000	490	8,014	10,391			18,895
2001	749	7,857	10,372			18,978
2002	1,613	12,514	11,327			25,454
2003	433	3,632	13,387			17,452
2004		3,922	13,449			17,371
2005		5,181	19,932			25,113
2006		3,658	17,263			20,921
2007		2,406	14,556			16,962
2008		1,310	10,729			12,039
2009		2,778	5,497			8,275
2010		2,512	7,275			9,787
2011		2,582	7,662			10,244
Total	3,285	56,366	141,840	0	0	201,491

F. COMPLAINT DATA

This section contains data regarding fair housing complaints, as provided by the U.S. Department of Housing and Urban Development (HUD), the Ohio Civil Rights Commission (OCRC), and the Fair Housing Contact Service (FHCS).

HUD COMPLAINTS

Table 6.F.1
Fair Housing Complaints by Basis
6. Ashtabula Housing Market Area
2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability		2	1	4	11	3	4	5	2	32
Family Status				2	2		2			6
National Origin						1				1
Race	1	1	3	1	1	2		2		11
Sex						1				1
Total Bases	1	3	4	7	14	7	6	7	2	51
Total Complaints	1	2	3	6	14	5	4	7	2	44

Table 6.F.2
Fair Housing Complaints by Issue
6. Ashtabula Housing Market Area
2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Discriminatory refusal to rent					6					6
Discriminatory refusal to rent and negotiate for rental				1	1			1		3
Discriminatory advertising, statements, and notices				2	6	1				10
False denial or representation of availability - rental							1			1
Discriminatory terms, conditions, privileges, or services and facilities		1	1		2			3	1	8
Discrimination in terms, conditions or privileges relating to rental	1	1	2		2	1	3	1		11
Discrimination in services and facilities relating to rental					1			2		3
Otherwise deny or make housing available								3		3
Discriminatory acts under Section 818 (coercion, etc.)		1		1						2
Using ordinances to discriminate in zoning and land use						1				1
Non-compliance with design and construction requirements (handicap)									1	1
Failure to provide an accessible building entrance		1								1
Failure to make reasonable accommodation		2		3	4	2		4		15
Total Issues	1	6	3	7	22	5	5	14	2	65
Total Complaints	1	2	3	6	14	5	4	7	2	44

Table 6.F.3
Fair Housing Complaints by Closure Status
 6. Ashtabula Housing Market Area
 2004–2012 HUD Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Administrative Closure Cause (FHAP)			1			2		1		4
Conciliated / Settled		1	1	4	3	2	2	4	1	18
No Cause	1	1	1		1	1				5
Open									1	1
Total Complaints	1	2	3	6	14	5	4	7	2	44

HUD Complaints Found With Cause

Table 6.F.4
Fair Housing Complaints Found With Cause by Basis
 6. Ashtabula Housing Market Area
 2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability		1	1	4	11	2	4	5	1	29
Family Status				2	2		2			6
Race		1	1	1				1		4
Sex						1				1
Total Bases	2	2	2	7	13	3	6	6	1	40
Total Complaints	1	1	1	6	13	2	4	6	1	34

Table 6.F.5
Fair Housing Complaints Found With Cause by Issue
 6. Ashtabula Housing Market Area
 2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Failure to make reasonable accommodation			1		3	4	1		4	13
Discriminatory advertising, statements, and notices						2	6	1	1	10
Discriminatory refusal to rent							6			6
Discriminatory terms, conditions, privileges, or services and facilities			1				2		3	6
Discrimination in terms, conditions or privileges relating to rental					1		1		3	6
Discrimination in services and facilities relating to rental							1		2	3
Discriminatory refusal to rent and negotiate for rental						1	1			2
Otherwise deny or make housing available									2	2
Discriminatory acts under Section 818 (coercion, etc.)			1			1				2
False denial or representation of availability - rental								1		1
Non-compliance with design and construction requirements (handicap)									1	1
Failure to provide an accessible building entrance			1							1
Total Issues	0	4	1	7	21	2	5	12	1	53
Total Complaints		1	1	6	13	2	4	6	1	34

OHIO CIVIL RIGHTS COMMISSION COMPLAINTS

Table 6.F.6
Fair Housing Complaints by Basis
 6. Ashtabula Housing Market Area
 2004–2012 OCRC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Family Status				4				1		5
Retaliation		2		1						3
Disability		1		3	10	4	2	3		23
Race	2	1	3	1	5			3		17
National Origin						1				1
Total Bases	2	4	3	9	12	10	2	7	0	49
Total Complaints	1	2	2	7	10	7	2	5		36

Table 6.F.7
Fair Housing Complaints by Issue
 6. Ashtabula Housing Market Area
 2004–2012 OCRC Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Terms and Conditions		1	1		2			3		7
Exclusion					5					5
Harassment	1			1						2
Reasonable Accommodation				2	7	2	2	3		16
Other		1	1	5	1	5		1		14
Intimidation						1				1
Total Issues	1	2	2	8	15	8	2	7	0	45
Total Complaints	1	2	2	7	10	7	2	5		36

Table 6.F.8
Fair Housing Complaints by Closure Status
 6. Ashtabula Housing Market Area
 2004–2012 OCRC Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
No Cause Finding Issued	1	2	1	1	1	1				7
Successful Conciliation					4	1	1			6
Withdrawal With Benefits				4		1		1		6
CP Failed to Cooperate			1			1		1		3
Settlement With Benefits				1	5	2	1	3		12
CP Withdrawal – No Benefit				1						1
No Jurisdiction						1				1
Total Complaints	1	2	2	7	10	7	2	5	0	36

FAIR HOUSING RESOURCE CENTER COMPLAINTS

Table 6.F.11
Fair Housing Complaints by Basis
6. Ashtabula Housing Market Area
2004– 2012 FHRC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability					2	2	1	1		6
Family Status									1	1
Race			1			1				2
Other	1			2			1	1		5
Total Bases	1	0	1	2	2	3	2	2	1	14
Total Complaints	1		1	2	2	3	2	2	1	14

Table 6.F.12
Fair Housing Complaints by Issue Type
6. Ashtabula Housing Market Area
2004– 2012 FHRC Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Rental	1		1	2	2	3	2	2	1	14
Total	1	0	1	2	2	3	2	2	1	14

Table 6.F.13
Fair Housing Complaints by Closure Status
6. Ashtabula Housing Market Area
2004– 2012 FHRC Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Settled through counseling		1		1	2	2	3		2	12
Complaint filed in federal court										5
Reasonable Accommodation Granted									2	2
Total	1	0	1	2	2	3	2	2	1	14

G. FAIR HOUSING SURVEY FOR HOUSING STAKEHOLDERS DATA

This section presents public involvement data gathered through the 2012–2013 Fair Housing Survey for Housing Stakeholders.

Table 6.G.1
Primary Role of Respondent
6. Ashtabula Housing Market Area
2012–2013 Fair Housing Survey for Housing
Stakeholders Data

Primary Role	Total
Advocate/Service Provider	1
Real Estate	2
Other Role	4
Total	7

FEDERAL, STATE, AND LOCAL LAWS

Table 6.G.2
Familiarity with Fair Housing Laws

6. Ashtabula Housing Market Area
2012–2013 Fair Housing Survey
for Housing Stakeholders Data

Familiarity	Total
Not Familiar	1
Somewhat Familiar	0
Very Familiar	5
Missing	1
Total	7

Table 6.G.3
Perceptions About Fair Housing Laws

6. Ashtabula Housing Market Area
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?	6			1	7
Are fair housing laws difficult to understand or follow?	1	4	1	1	7
Do you think fair housing laws should be changed?	1	4		2	7
Do you think fair housing laws are adequately enforced?	4		1	2	7

Table 6.G.4
Fair Housing Activities

6. Ashtabula Housing Market Area
2012–2013 Fair Housing Survey for Housing Stakeholders Data

2012 - 2016 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?		4		1	2	7
Have you participated in fair housing training?		5			2	7
Are you aware of any fair housing testing?		4	1		2	7
Testing and education	Too Little	Right Amount	Too Much	Don't Know	Missing	Total
Is there sufficient outreach and education activity?	2	1	1	1	2	7
Is there sufficient testing?		1	1	3	2	7

Table 6.G.5
Protected Classes

6. Ashtabula Housing Market Area
2012–2013 Fair Housing Survey
for Housing Stakeholders Data

Protected Class	Total
Family Status	4
Religion	4
Gender	3
National Origin	2
Color	2
Sexual Orientation	1
Age	1
Military	2
Ancestry	1
Other	1
Total	21

Table 6.G.6
Fair Housing Violation Referrals
 6. Ashtabula Housing Market Area
 2012–2013 Fair Housing Survey for Housing
 Stakeholders Data

Referral	Total
Ashtabula County Fair Housing Office	1
Don't Know	1
HUD	2
Total	4

LOCAL FAIR HOUSING

Table 6.G.7
Local Fair Housing
 6. Ashtabula Housing Market Area
 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?	1	2		4	7
Are there any specific geographic areas that have fair housing problems?		1	2	4	7
Are there any specific groups in that face housing discrimination?		1	2	4	7

FAIR HOUSING IN THE PRIVATE SECTOR

Table 6.G.8
Barriers to Fair Housing in the Private Sector
 6. Ashtabula Housing Market Area
 2012–2013 Fair Housing Survey for Housing Stakeholders Data

Question	Yes	No	Don't Know	Missing	Total
Are you aware of any questionable practices or barriers to fair housing choice in:					
The rental housing market?	4	1		2	7
The real estate industry?	5			2	7
The mortgage and home lending industry?	5			2	7
The housing construction or accessible housing design fields?	4	1		2	7
The home insurance industry?	4	1		2	7
The home appraisal industry?	5			2	7
Any other housing services?	4			3	7

FAIR HOUSING IN THE PUBLIC SECTOR

Table 6.G.9
Barriers to Fair Housing in the Public Sector
 6. Ashtabula Housing Market Area
 2012–2013 Fair Housing Survey for Housing Stakeholders Data

Question	Yes	No	Don't Know	Missing	Total
Are you aware of any questionable practices or barriers to fair housing choice in:					
Land use policies?		2	1	4	7
Zoning laws?		2	1	4	7
Occupancy standards or health and safety codes?		2	1	4	7
Property tax policies?	1	1	1	4	7
Permitting process?		2	1	4	7
Housing construction standards?		2	1	4	7
Neighborhood or community development policies?		2	1	4	7
Limited access to government services, such as employment services?		3		4	7
Public administrative actions or regulations?		3		4	7

NARRATIVE COMMENTS

Federal, State, and Local Laws

Table 6.G.10
How did you become aware of fair housing laws?
 6. Ashtabula Housing Market Area
 2013 Fair Housing Survey Data

Comments:
education I am a Real Estate broker Through trainings for Housing Counselors under HUD. Was a Realtor for over 15 years

Table 6.G.11
How should fair housing laws be changed?
 6. Ashtabula Housing Market Area
 2013 Fair Housing Survey Data

Comments:
Familial status because sometimes a landlord should have the option to rent certain units to certain size families.

H. LAND USE PLANNING SURVEY DATA

This section contains data regarding the potential effects of local land use and housing policies on fair housing choice, as gathered from the Fair Housing Survey for Government Officials.

FAIR HOUSING SURVEY FOR GOVERNMENT OFFICIALS

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 was conducted predominately online. Respondents were solicited by mass-distributed emails sent by the NEOSCC, members of the Progress Review Team, and other various organizations in the 12-county region.

This section contains data gathered from the public sector staff in the Ashtabula Housing Market Area that received and completed the survey.²⁶

Table 6.H.1
Housing Development
 6. Ashtabula Housing Market Area
 2012 Fair Housing Survey for Government Officials Data

Question: Does your jurisdiction have...	Yes	No	Don't Know	Missing	Total
Housing Development					
Definitions for "dwelling unit" or "residential unit"?	0	0	0	3	3
Guidelines that encourage development affordable housing units?	0	0	0	3	3
Any potential barriers to the development of low- to moderate- income housing?	0	0	0	3	3
Guidelines that allow the development of mixed use housing?	0	0	0	3	3
Any potential barriers to the development of mixed use housing?	0	0	0	3	3
Occupancy Standards					
A definition for the term "family"?	0	0	0	3	3
Residential occupancy standards or limits?	0	0	0	3	3
Special Needs Housing					
A definition for the term "disability"?	0	0	0	3	3
Development standards for making housing accessible to persons with disabilities?	0	0	0	3	3
A process by which persons with disabilities can request modification to the jurisdiction's policies?	0	0	0	3	3
Standards for the development of senior housing?	0	0	0	3	3
Guidelines that distinguish senior citizen housing from other residential uses?	0	0	0	3	3
Guidelines for developing housing for any other special needs populations?	0	0	0	3	3
Fair Housing Policies					
A fair housing ordinance, policy, or regulation?	0	0	0	3	3
Policies or practices for "affirmatively furthering fair housing"?	0	0	0	3	3

I. IMPEDIMENTS

The *2013 Northeast Ohio Regional Analysis of Impediments to Fair Housing Choice* uncovered several potential issues regarding fair housing in the Ashtabula Housing Market Area. Identification of these items as probable impediments to fair housing choice was based on HUD's definition of impediments as actions, omissions, or decisions that restrict housing choice due to protected class status or actions, omissions, or decisions that have this effect. The identified impediments are supported by evidence uncovered during the Regional AI process, with impediments of higher need being those identified in multiple sources.

These probable impediments in the entirety of the Northeast Ohio Region are presented in **Volumes I** and **II** of the Regional AI. They are accompanied by suggested actions that jurisdictions in the Region may implement in order to alleviate or eliminate these impediments, and are accompanied by measurable objectives. The goal of these actions and measurable objectives is to assist these agencies in offering greater housing choice for all citizens of the Northeast Ohio Region.

²⁶ For areas with both nonentitlement and entitlement communities, the results of the nonentitlement community government official survey and the entitlement community interviews were summed.

The following list presents the private and public sector impediments found in the Ashtabula Housing Market Area.

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:* 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.

IMPEDIMENTS MATRIX

The matrix on the following page includes the impediment, data source, or sources that indicated its existence, protected classes most affected, and ranking of need for action. Level of need for action was determined based on the number of data sources that identified each impediment.

Table 6.I.1
Impediments Matrix
 6. Ashtabula Housing Market Area
 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 ²⁷		
Private Sector												
1	Denial of available housing units in the rental markets		X				X	X			Black and Hispanic persons	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			Disabled persons	L
Public Sector												
1	Lack of sufficient fair housing policies or practices by several units of local government							X			All	L
2	Lack of sufficient fair housing outreach and education efforts							X	X	X	All	H
3	Land use and planning decisions and operational practices resulting in unequal access to government services such as transportation							X		X	All	M
4	Lack of inclusionary policies							X		X	All	M

²⁷ 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.

7. CANTON-MASSILLON HOUSING MARKET AREA

A. CENSUS BUREAU DATA

This section contains additional data from the U.S. Census Bureau.

Table 7.A.1

Population by Age

7. Canton-Massillon Housing Market Area
2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00-10
	Population	% of Total	Population	% of Total	
Under 5	24,167	6.4%	21,830	5.8%	-9.7%
5 to 19	80,029	21.2%	74,719	19.9%	-6.6%
20 to 24	21,069	5.6%	22,200	5.9%	5.4%
25 to 34	46,097	12.2%	41,437	11.0%	-10.1%
35 to 54	113,655	30.1%	103,609	27.6%	-8.8%
55 to 64	36,027	9.5%	50,813	13.5%	41.0%
65 or Older	57,054	15.1%	60,978	16.2%	6.9%
Total	378,098	100.0%	375,586	100.0%	-7%

Table 7.A.2

Elderly Population by Age

7. Canton-Massillon Housing Market Area
2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00-10
	Population	% of Total	Population	% of Total	
65 to 66	5,663	9.9%	7,168	11.8%	26.6%
67 to 69	8,759	15.4%	10,187	16.7%	16.3%
70 to 74	14,633	25.6%	13,564	22.2%	-7.3%
75 to 79	12,882	22.6%	11,025	18.1%	-14.4%
80 to 84	8,322	14.6%	9,584	15.7%	15.2%
85 or Older	6,795	11.9%	9,450	15.5%	39.1%
Total	57,054	100.0%	60,978	100.0%	6.9%

Table 7.A.3

Population by Race and Ethnicity

7. Canton-Massillon Housing Market Area
2000 & 2010 Census SF1 Data

Race	2000 Census		2010 Census		% Change 00-10
	Population	% of Total	Population	% of Total	
White	341,342	90.3%	333,191	88.7%	-2.4%
Black	27,219	7.2%	28,537	7.6%	4.8%
American Indian	920	.2%	961	.3%	4.5%
Asian	2,059	.5%	2,764	.7%	34.2%
Native Hawaiian/ Pacific Islander	57	.0%	85	.0%	49.1%
Other	1,098	.3%	1,720	.5%	56.6%
Two or More Races	5,403	1.4%	8,328	2.2%	54.1%
Total	378,098	100.0%	375,586	100.0%	-7%
Non-Hispanic	374,606	99.1	369,621	98.4%	-1.3%
Hispanic	3,492	.9%	5,965	1.6%	70.8%

Table 7.A.4**Disability by Age**7. Canton-Massillon Housing Market Area
2010 Three-Year ACS Data

Age	Male		Female		Total	
	Disabled Population	Disability Rate	Disabled Population	Disability Rate	Disabled Population	Disability Rate
Under 5	35	.3%	54	.5%	89	.4%
5 to 17	3,162	9.5%	1,323	4.2%	4,485	6.9%
18 to 34	2,410	6.7%	2,122	5.7%	4,532	6.2%
35 to 64	9,811	13.1%	10,724	13.5%	20,535	13.3%
65 to 74	3,616	26.2%	3,825	23.6%	7,441	24.8%
75 or Older	5,235	49.5%	8,139	49.3%	13,374	49.4%
Total	24,269	13.5%	26,187	13.7%	50,456	13.6%

Table 7.A.5**Employment Status by Disability and Type: Age 18 to 64**7. Canton-Massillon Housing Market Area
2010 Three-Year ACS Data

Disability Status	Population
Employed:	162,185
With a disability:	8,182
With a hearing difficulty	2,009
With a vision difficulty	1,807
With a cognitive difficulty	2,579
With an ambulatory difficulty	3,046
With a self-care difficulty	820
With an independent living difficulty	1,556
No disability	154,003
Unemployed:	17,183
With a disability:	2,026
With a hearing difficulty	327
With a vision difficulty	413
With a cognitive difficulty	865
With an ambulatory difficulty	670
With a self-care difficulty	149
With an independent living difficulty	425
No disability	15,157
Not in labor force:	48,241
With a disability:	14,859
With a hearing difficulty	2,040
With a vision difficulty	1,952
With a cognitive difficulty	7,568
With an ambulatory difficulty	9,296
With a self-care difficulty	3,091
With an independent living difficulty	6,018
No disability	33,382
Total	227,609

Table 7.A.6**Households by Income**

7. Canton-Massillon Housing Market Area
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	22,355	15.1%	20,093	13.3%
\$15,000 to \$19,999	10,098	6.8%	9,962	6.6%
\$20,000 to \$24,999	10,646	7.2%	9,815	6.5%
\$25,000 to \$34,999	21,309	14.4%	19,145	12.7%
\$35,000 to \$49,999	27,793	18.7%	24,237	16.1%
\$50,000 to \$74,999	30,062	20.3%	29,214	19.4%
\$75,000 to \$99,999	13,287	9.0%	17,833	11.8%
\$100,000 or More	12,773	8.6%	20,622	13.7%
Total	148,323	100.0%	150,921	100.0%

Table 7.A.7**Poverty by Age**

7. Canton-Massillon Housing Market Area
2000 Census SF3 & 2010 Five-Year ACS Data

Age	2000 Census		2010 Five-Year ACS	
	Persons in Poverty	% of Total	Persons in Poverty	% of Total
Under 6	4,825	14.2%	6,785	14.5%
6 to 17	7,364	21.7%	9,981	21.4%
18 to 64	18,161	53.6%	26,155	56.0%
65 or Older	3,515	10.4%	3,765	8.1%
Total	33,865	100.0%	46,686	100.0%
Poverty Rate	9.2%	.	12.7%	.

Table 7.A.8**Households by Year Home Built**

7. Canton-Massillon Housing Market Area
2000 Census SF3 & 2010 Five-Year ACS Data

Year Built	2000 Census		2010 Five-Year ACS	
	Households	% of Total	Households	% of Total
1939 or Earlier	34,785	23.5%	32,061	21.2%
1940 to 1949	14,911	10.1%	13,290	8.8%
1950 to 1959	24,704	16.7%	24,685	16.4%
1960 to 1969	21,219	14.3%	19,831	13.1%
1970 to 1979	25,896	17.5%	24,062	15.9%
1980 to 1989	11,947	8.1%	11,237	7.4%
1990 to 1999	14,854	10.0%	14,686	9.7%
2000 to 2004	.	.	8,021	5.3%
2005 or Later	.	.	3,048	2.0%
Total	148,316	100.0%	150,921	100.0%

Table 7.A.9**Housing Units by Type**7. Canton-Massillon Housing Market Area
2000 Census SF3 & 2010 Five-Year ACS Data

Unit Type	2000 Census		2010 Five-Year ACS	
	Units	% of Total	Units	% of Total
Single-Family	120,324	76.6%	130,627	79.3%
Duplex	11,391	7.3%	8,981	5.4%
Tri- or Four-Plex	6,051	3.9%	5,925	3.6%
Apartment	15,407	9.8%	15,614	9.5%
Mobile Home	3,825	2.4%	3,615	2.2%
Boat, RV, Van, Etc.	26	.0%	62	.0%
Total	157,024	100.0%	164,824	100.0%

Table 7.A.10**Housing Units by Tenure**7. Canton-Massillon Housing Market Area
2000 & 2010 Census SF1 Data

Tenure	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
Occupied Housing Units	148,316	94.5%	151,089	91.4%	1.9%
Owner-Occupied	107,365	72.4%	106,365	70.4%	-.9%
Renter-Occupied	40,951	27.6%	44,724	29.6%	9.2%
Vacant Housing Units	8,708	5.5%	14,126	8.6%	62.2%
Total Housing Units	157,024	100.0%	165,215	100.0%	5.2%

Table 7.A.11**Disposition of Vacant Housing Units**7. Canton-Massillon Housing Market Area
2000 & 2010 Census SF1 Data

Disposition	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
For Rent	3,636	41.8%	4,993	35.3%	37.3%
For Sale	1,566	18.0%	2,453	17.4%	56.6%
Rented or Sold, Not Occupied	986	11.3%	840	5.9%	-14.8%
For Seasonal, Recreational, or Occasional Use	443	5.1%	726	5.1%	63.9%
For Migrant Workers	81	0.9%	8	.1%	-90.1%
Other Vacant	1,996	22.9%	5,106	36.1%	155.8%
Total	8,708	100.0%	14,126	100.0%	62.2%

Table 7.A.12**Households by Household Size**7. Canton-Massillon Housing Market Area
2000 & 2010 Census SF1 Data

Size	2000 Census		2010 Census		% Change 00-10
	Households	% of Total	Households	% of Total	
One Person	38,711	26.1%	42,453	28.1%	9.7%
Two Persons	51,469	34.7%	53,410	35.4%	3.8%
Three Persons	24,369	16.4%	23,851	15.8%	-2.1%
Four Persons	20,655	13.9%	18,613	12.3%	-9.9%
Five Persons	9,044	6.1%	8,210	5.4%	-9.2%
Six Persons	2,797	1.9%	3,021	2.0%	8.0%
Seven Persons or More	1,271	.9%	1,531	1.0%	20.5%
Total	148,316	100.0%	151,089	100.0%	1.9%

Table 7.A.13**Household Type by Tenure**7. Canton-Massillon Housing Market Area
2000 & 2010 Census SF1 Data

Household Type	2000 Census		2010 Census		% Change 00–10
	Households	% of Total	Households	% of Total	
Family Households	102,739	69.3%	100,417	66.5%	-2.3%
Married-Couple Family	80,342	78.2%	74,289	74.0%	-7.5%
Owner-Occupied	70,135	87.3%	64,976	87.5%	-7.4%
Renter-Occupied	10,207	12.7%	9,313	12.5%	-8.8%
Other Family	22,397	21.8%	26,128	26.0%	16.7%
Male Householder, No Spouse	5,401	24.1%	6,985	26.7%	29.3%
Owner-Occupied	3,339	61.8%	4,124	59.0%	23.5%
Renter-Occupied	2,062	38.2%	2,861	41.0%	38.7%
Female Householder, No Spouse	16,996	75.9%	19,143	73.3%	12.6%
Owner-Occupied	8,920	52.5%	9,207	48.1%	3.2%
Renter-Occupied	8,076	47.5%	9,936	51.9%	23.0%
Non-Family Households	45,577	30.7%	50,672	33.5%	11.2%
Owner-Occupied	24,971	54.8%	28,058	55.4%	12.4%
Renter-Occupied	20,606	45.2%	22,614	44.6%	9.7%
Total	148,316	100.0%	151,089	100.0%	1.9%

Table 7.A.14**Group Quarters Population**7. Canton-Massillon Housing Market Area
2000 & 2010 Census SF1 Data

Group Quarters Type	2000 Census		2010 Census		% Change 00-10
	Population	% of Total	Population	% of Total	
Institutionalized					
Correctional Institutions	419	8.2%	560	12.8%	33.7%
Juvenile Facilities	.	.	342	7.8%	.
Nursing Homes	4,126	81.1%	3,367	77.0%	-18.4%
Other Institutions	542	10.7%	103	2.4%	-81.0%
Total	5,087	100.0%	4,372	100.0%	-14.1%
Noninstitutionalized					
College Dormitories	2,591	67.4%	3,377	69.0%	30.3%
Military Quarters	0	.0%	0	.0%	%
Other Noninstitutional	1,255	32.6%	1,515	31.0%	20.7%
Total	3,846	43.1%	4,892	52.8%	27.2%
Total Group Quarters Population	8,933	100.0%	9,264	100.0%	3.7%

Table 7.A.15**Overcrowding and Severe Overcrowding**7. Canton-Massillon Housing Market Area
2000 Census SF3 & 2010 Five-Year ACS Data

Data Source	No Overcrowding		Overcrowding		Severe Overcrowding		Total
	Households	% of Total	Households	% of Total	Households	% of Total	
Owner							
2000 Census	106,648	99.3%	641	.6%	108	.1%	107,397
2010 ACS	106,551	99.4%	521	.5%	93	.1%	107,165
Renter							
2000 Census	40,011	97.8%	671	1.6%	237	.6%	40,919
2010 ACS	42,882	98.0%	696	1.6%	178	.4%	43,756
Total							
2000 Census	146,659	98.9%	1,312	.9%	345	.2%	148,316
2010 ACS	149,433	99.0%	1,217	.8%	271	.2%	150,921

Table 7.A.16
Households with Incomplete Plumbing Facilities
 7. Canton-Massillon Housing Market Area
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Plumbing Facilities	147,836	150,553
Lacking Complete Plumbing Facilities	480	368
Total Households	148,316	150,921
Percent Lacking	.3%	.2%

Table 7.A.17
Households with Incomplete Kitchen Facilities
 7. Canton-Massillon Housing Market Area
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Kitchen Facilities	147,721	150,000
Lacking Complete Kitchen Facilities	595	921
Total Households	148,316	150,921
Percent Lacking	.4%	.6%

Table 7.A.18
Cost Burden and Severe Cost Burden by Tenure
 7. Canton-Massillon Housing Market Area
 2000 Census & 2010 Five-Year ACS Data

Data Source	Less Than 30%		31%-50%		Above 50%		Not Computed		Total
	Households	% of Total	Households	% of Total	Households	% of Total	Households	% of Total	
Owner With a Mortgage									
2000 Census	50,123	77.5%	9,814	15.2%	4,526	7.0%	214	.3%	64,677
2010 ACS	50,235	69.9%	14,240	19.8%	7,126	9.9%	239	.3%	71,840
Owner Without a Mortgage									
2000 Census	29,752	91.7%	1,376	4.2%	844	2.6%	458	1.4%	32,430
2010 ACS	30,870	87.4%	2,713	7.7%	1,468	4.2%	274	.8%	35,325
Renter									
2000 Census	24,829	61.4%	7,193	17.8%	5,660	14.0%	2,751	6.8%	40,433
2010 ACS	21,832	49.9%	9,923	22.7%	9,239	21.1%	2,762	6.3%	43,756
Total									
2000 Census	104,704	76.1%	18,383	13.4%	11,030	8.0%	3,423	2.5%	137,540
2010 ACS	102,937	68.2%	26,876	17.8%	17,833	11.8%	3,275	2.2%	150,921

Table 7.A.19
Median Housing Costs
 7. Canton-Massillon Housing Market Area
 2000 Census SF3 & 2010 Five-Year ACS Data

Housing Cost	2000 Census	2010 ACS
Median Contract Rent	\$398	\$490
Median Home Value	\$100,300	\$128,000

B. BEA DATA

This section contains additional Bureau of Economic Analysis (BEA) data that address employment and income.

Table 7.B.1
Employment by Industry
 7. Canton-Massillon Housing Market Area
 Select Years 2001–2010 BEA Data

NAICS Categories	2001	2005	2006	2007	2008	2009	2010	% Change 01–10
Farm employment	1,673	1,484	1,495	1,526	1,412	1,429	1,417	-15.3%
Forestry, fishing, related activities, and other	(D) ²⁸	210	(D)	(D)	249	(D)	242	%
Mining	(D)	1,018	(D)	(D)	1,562	(D)	1,711	%
Utilities	701	645	645	572	556	526	500	-28.7%
Construction	12,397	13,704	12,948	12,600	12,097	10,760	10,128	-18.3%
Manufacturing	41,245	30,782	30,006	29,910	29,165	25,334	24,471	-40.7%
Wholesale trade	9,283	8,052	7,404	7,322	7,198	6,843	6,582	-29.1%
Retail trade	26,843	26,291	25,737	25,564	24,976	24,000	23,858	-11.1%
Transportation and warehousing	4,146	4,927	5,037	5,312	5,031	4,614	4,477	8.0%
Information	2,656	2,467	2,548	2,574	2,510	2,328	2,353	-11.4%
Finance and insurance	7,941	9,308	9,004	9,158	9,657	10,172	10,329	30.1%
Real estate and rental and leasing	6,000	7,679	7,554	7,375	7,295	7,171	7,139	19.0%
Professional and technical services	8,627	8,748	8,487	8,817	8,766	8,223	8,135	-5.7%
Management of companies and enterprises	867	892	925	1,084	1,109	1,662	1,535	77.0%
Administrative and waste services	12,347	12,479	12,027	12,165	11,775	10,839	11,307	-8.4%
Educational services	4,238	4,767	4,771	4,806	4,864	4,942	5,091	20.1%
Health care and social assistance	25,633	27,820	28,113	28,646	28,926	29,230	29,216	14.0%
Arts, entertainment, and recreation	3,086	3,217	3,200	3,141	3,250	3,227	3,299	6.9%
Accommodation and food services	13,778	15,194	15,176	15,405	15,171	14,602	14,752	7.1%
Other services, except public administration	13,170	13,408	13,034	13,049	12,877	12,457	12,295	-6.6%
Government and government enterprises	20,829	21,133	20,801	20,807	20,802	20,369	20,663	-.8%
Total	217,160	214,225	210,254	211,268	209,248	200,593	199,500	-8.1%

²⁸ (D): These data are not shown to avoid disclosure of confidential information, but estimates are included in the totals.

Table 7.B.2
Real Earnings by Industry
 7. Canton-Massillon Housing Market Area
 Select Years 2001–2010 BEA Data, Real 2011 Dollars

NAICS Categories	2001	2005	2006	2007	2008	2009	2010	% Change 00–10
Farm earnings	22,173	13,771	8,698	12,843	18,833	19,377	16,514	-25.5%
Forestry, fishing, related activities, and other	(D) ²⁹	4,166	(D)	(D)	4,232	(D)	2,913	.
Mining	(D)	81,137	(D)	(D)	236,696	(D)	57,173	.
Utilities	72,637	68,867	68,640	52,000	57,378	54,811	54,867	-24.5%
Construction	784,175	642,106	610,496	560,386	523,275	447,181	431,044	-45.0%
Manufacturing	2,500,423	2,014,800	1,976,520	1,935,266	1,932,211	1,616,788	1,605,937	-35.8%
Wholesale trade	528,030	477,382	437,017	440,052	437,000	403,469	386,118	-26.9%
Retail trade	797,405	799,614	779,372	742,805	684,839	642,493	663,569	-16.8%
Transportation and warehousing	170,737	201,265	195,098	206,868	213,164	186,979	190,623	11.6%
Information	121,077	119,980	116,674	115,381	104,175	102,681	101,860	-15.9%
Finance and insurance	392,962	482,056	457,898	458,813	403,913	390,052	391,592	-.3%
Real estate and rental and leasing	114,874	115,141	97,614	77,753	89,733	96,118	91,951	-20.0%
Professional and technical services	366,297	352,705	343,090	346,381	365,165	329,392	338,749	-7.5%
Management of companies and enterprises	54,991	64,799	73,059	93,739	84,816	112,051	108,143	96.7%
Administrative and waste services	286,264	335,362	306,928	314,796	298,149	277,924	288,195	.7%
Educational services	88,994	109,109	110,956	115,048	120,329	125,949	129,374	45.4%
Health care and social assistance	1,193,099	1,360,384	1,387,351	1,390,731	1,451,220	1,469,991	1,445,655	21.2%
Arts, entertainment, and recreation	50,821	40,714	41,118	39,182	38,774	39,862	40,463	-20.4%
Accommodation and food services	226,681	255,496	246,526	262,251	250,883	243,322	261,069	15.2%
Other services, except public administration	393,850	442,060	427,602	417,758	375,303	351,160	359,609	-8.7%
Government and government enterprises	1,040,134	1,118,228	1,092,543	1,091,180	1,094,171	1,109,440	1,127,470	8.4%
Total	9,259,175	9,099,143	8,882,606	8,761,158	8,784,258	8,074,422	8,092,885	-12.6%

²⁹ (D): These data are not shown to avoid disclosure of confidential information, but estimates are included in the totals.

Table 7.B.3
Real Earnings Per Job by Industry
 7. Canton-Massillon Housing Market Area
 Select Years 2001–2010 BEA Data, 1,000's of Real 2011 Dollars

NAICS Categories	2001	2005	2006	2007	2008	2009	2010	% Change 00–10
Farm earnings	13,254	9,280	5,818	8,416	13,338	13,560	11,654	-12.1%
Forestry, fishing, related activities, and other	(D) ³⁰	19,838	(D)	(D)	16,998	(D)	12,037	.
Mining	(D)	79,702	(D)	(D)	151,534	(D)	33,415	.
Utilities	103,619	106,770	106,418	90,910	103,198	104,204	109,733	5.9%
Construction	63,255	46,855	47,150	44,475	43,257	41,560	42,560	-32.7%
Manufacturing	60,624	65,454	65,871	64,703	66,251	63,819	65,626	8.3%
Wholesale trade	56,881	59,287	59,024	60,100	60,711	58,961	58,663	3.1%
Retail trade	29,706	30,414	30,282	29,057	27,420	26,771	27,813	-6.4%
Transportation and warehousing	41,181	40,849	38,733	38,943	42,370	40,524	42,578	3.4%
Information	45,586	48,634	45,790	44,826	41,504	44,107	43,289	-5.0%
Finance and insurance	49,485	51,789	50,855	50,100	41,826	38,346	37,912	-23.4%
Real estate and rental and leasing	19,146	14,994	12,922	10,543	12,301	13,404	12,880	-32.7%
Professional and technical services	42,459	40,318	40,425	39,286	41,657	40,057	41,641	-1.9%
Management of companies and enterprises	63,426	72,645	78,982	86,475	76,479	67,419	70,451	11.1%
Administrative and waste services	23,185	26,874	25,520	25,877	25,321	25,641	25,488	9.9%
Educational services	20,999	22,888	23,256	23,938	24,739	25,485	25,412	21.0%
Health care and social assistance	46,545	48,900	49,349	48,549	50,170	50,291	49,482	6.3%
Arts, entertainment, and recreation	16,468	12,656	12,849	12,474	11,930	12,353	12,265	-25.5%
Accommodation and food services	16,452	16,816	16,244	17,024	16,537	16,664	17,697	7.6%
Other services, except public administration	29,905	32,970	32,807	32,015	29,145	28,190	29,248	-2.2%
Government and government enterprises	49,937	52,914	52,524	52,443	52,599	54,467	54,565	9.3%
Average	42,638	42,475	42,247	41,469	41,980	40,253	40,566	-4.86%

³⁰ (D): These data are not shown to avoid disclosure of confidential information, but estimates are included in the totals.

Table 7.B.4
Total Employment and Real Personal Income
 7. Canton-Massillon Housing Market Area
 1969–2010 BEA Data, 2011 Dollars

Year	1,000s of 2011 Dollars						Per Capita Income	Total Employment	Real Average Earnings Per Job
	Earnings	Social Security Contributions	Residents Adjustments	Dividends, Interest, Rents	Transfer Payments	Personal Income			
1969	5,820,618	403,023	34,539	848,185	497,339	6,797,659	18,373	160,468	36,273
1970	5,734,666	393,890	34,714	869,584	555,426	6,800,500	18,246	160,488	35,733
1971	5,501,500	388,543	79,784	882,170	626,103	6,701,013	17,880	155,354	35,413
1972	5,918,982	439,606	95,266	896,486	665,711	7,136,840	19,181	158,651	37,308
1973	6,420,916	552,514	98,043	933,556	732,846	7,632,846	20,009	167,857	38,252
1974	6,548,805	582,008	99,044	978,765	795,034	7,839,639	20,505	173,250	37,800
1975	6,206,136	536,604	105,920	965,089	944,776	7,685,316	20,324	167,417	37,070
1976	6,448,910	564,670	112,595	983,128	971,843	7,951,805	21,156	167,645	38,468
1977	6,729,367	588,719	179,191	1,039,304	951,605	8,310,748	22,095	170,935	39,368
1978	7,067,270	641,704	205,855	1,103,035	948,509	8,682,965	22,946	177,987	39,707
1979	7,302,632	690,030	225,291	1,180,512	1,005,460	9,023,865	23,917	182,663	39,979
1980	6,941,305	654,242	245,670	1,346,475	1,168,450	9,047,658	23,887	179,289	38,716
1981	6,933,466	699,641	213,612	1,519,165	1,192,036	9,158,638	24,247	177,877	38,979
1982	6,375,956	652,228	234,291	1,603,124	1,337,986	8,899,130	23,673	170,417	37,414
1983	6,173,003	639,470	268,172	1,654,063	1,378,292	8,834,061	23,635	165,297	37,345
1984	6,530,143	698,073	272,052	1,786,052	1,355,200	9,245,373	24,780	172,224	37,917
1985	6,573,332	716,528	285,854	1,813,077	1,393,547	9,349,282	25,242	175,330	37,491
1986	6,472,004	728,447	329,080	1,833,351	1,465,098	9,371,086	25,511	176,798	36,607
1987	6,683,925	753,359	310,593	1,796,707	1,486,063	9,523,929	26,037	182,656	36,593
1988	6,987,358	809,466	307,146	1,841,486	1,504,443	9,830,968	26,755	186,249	37,516
1989	7,020,350	820,596	328,763	2,022,688	1,543,500	10,094,704	27,425	189,396	37,067
1990	7,103,996	846,094	315,173	2,011,219	1,668,695	10,252,988	27,856	192,441	36,915
1991	6,980,613	847,120	319,824	1,932,811	1,702,889	10,089,017	27,257	192,046	36,349
1992	7,267,758	874,977	340,810	1,919,361	1,820,664	10,473,615	28,127	190,459	38,159
1993	7,464,416	913,292	371,106	1,928,934	1,841,465	10,692,628	28,530	192,961	38,684
1994	7,764,851	961,068	390,450	2,049,459	1,814,776	11,058,468	29,406	197,143	39,387
1995	7,950,295	990,830	409,466	2,088,880	1,864,621	11,322,431	30,030	202,137	39,331
1996	8,009,893	987,779	428,027	2,168,141	1,915,170	11,533,452	30,529	205,201	39,034
1997	8,138,800	985,541	425,437	2,306,220	1,925,073	11,809,989	31,263	208,903	38,960
1998	8,776,187	1,018,609	439,635	2,408,660	1,949,833	12,555,707	33,256	213,876	41,034
1999	8,960,991	1,023,785	477,161	2,384,692	1,981,742	12,780,801	33,792	215,340	41,613
2000	9,273,069	1,018,335	493,350	2,435,738	2,057,801	13,241,622	35,027	219,874	42,174
2001	9,259,175	1,024,427	413,681	2,237,011	2,184,882	13,070,322	34,642	217,160	42,638
2002	9,119,918	987,996	461,766	2,081,877	2,292,972	12,968,536	34,411	213,940	42,628
2003	9,075,539	992,224	523,499	2,004,393	2,355,409	12,966,616	34,420	211,393	42,932
2004	9,116,518	1,012,705	556,951	1,890,380	2,367,895	12,919,039	34,299	212,437	42,914
2005	9,099,143	1,018,797	562,091	1,814,838	2,433,648	12,890,923	34,280	214,225	42,475
2006	8,882,606	1,002,838	590,036	1,974,918	2,494,582	12,939,304	34,397	210,254	42,247
2007	8,761,158	994,459	609,325	2,177,738	2,587,089	13,140,850	34,868	211,268	41,469
2008	8,784,258	1,022,819	611,087	2,253,075	2,749,051	13,374,651	35,463	209,248	41,980
2009	8,074,422	976,661	579,632	1,871,314	3,082,462	12,631,169	33,575	200,593	40,253
2010	8,092,885	973,034	607,607	1,890,355	3,181,349	12,799,162	34,095	199,500	40,566

C. BLS DATA

This section contains Bureau of Labor Statistics (BLS) data that address employment and income.

Table 7.C.1
Labor Force Statistics
 7. Canton-Massillon Housing Market Area
 1990–2011 BLS Data

Year	Labor Force	Employment	Unemployment	Unemployment Rate	Statewide Unemployment Rate
1990	183,182	171,757	11,425	6.2%	5.7%
1991	185,153	172,033	13,120	7.1%	6.6%
1992	186,387	171,797	14,590	7.8%	7.4%
1993	184,993	171,708	13,285	7.2%	6.7%
1994	184,941	173,870	11,071	6.0%	5.6%
1995	185,842	176,537	9,305	5.0%	4.9%
1996	188,608	178,277	10,331	5.5%	5.0%
1997	188,507	179,248	9,259	4.9%	4.6%
1998	188,415	180,444	7,971	4.2%	4.3%
1999	187,303	178,819	8,484	4.5%	4.3%
2000	192,945	184,957	7,988	4.1%	4.0%
2001	193,564	185,183	8,381	4.3%	4.4%
2002	192,292	180,982	11,310	5.9%	5.7%
2003	190,944	178,077	12,867	6.7%	6.2%
2004	189,834	177,359	12,475	6.6%	6.1%
2005	189,487	177,495	11,992	6.3%	5.9%
2006	189,056	178,273	10,783	5.7%	5.4%
2007	190,142	179,126	11,016	5.8%	5.6%
2008	190,676	177,862	12,814	6.7%	6.5%
2009	190,582	169,359	21,223	11.1%	10.1%
2010	187,910	166,905	21,005	11.2%	10.0%
2011	185,923	168,787	17,136	9.2%	8.6%

D. HMDA DATA

The Home Mortgage Disclosure Act (HMDA) requires both depository and non-depository lenders to collect and publicly disclose information about housing-related loans and loan applications.³¹ The information presented in this section presents detailed HMDA data, including denial rates and predatory lending including high annual percentage rate (APR) loans.

Table 7.D.1

Purpose of Loan by Year

7. Canton-Massillon Housing Market Area
2004–2011 HMDA Data

Purpose	2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	10,580	12,023	11,620	8,059	5,692	5,238	4,844	4,702	62,758
Home Improvement	2,690	3,001	3,397	2,688	1,882	979	850	874	16,361
Refinancing	24,654	23,300	20,580	14,804	9,417	12,234	11,100	9,498	125,587
Total	37,924	38,324	35,597	25,551	16,991	18,451	16,794	15,074	204,706

Table 7.D.2

Occupancy Status for Home Purchase Loan Applications

7. Canton-Massillon Housing Market Area
2004–2011 HMDA Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	Total
Owner-Occupied	9,507	10,791	10,498	7,198	5,228	4,985	4,591	4,424	57,222
Not Owner-Occupied	949	1,172	1,075	801	448	245	249	269	5,208
Not Applicable	124	60	47	60	16	8	4	9	328
Total	10,580	12,023	11,620	8,059	5,692	5,238	4,844	4,702	62,758

Table 7.D.3

Owner-Occupied Home Purchase Loan Applications by Loan Type

7. Canton-Massillon Housing Market Area
2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Conventional	8,340	9,727	9,429	6,122	2,730	1,763	1,680	1,894	41,685
FHA - Insured	983	865	898	941	2,253	2,871	2,626	2,102	13,539
VA - Guaranteed	177	192	171	132	185	206	207	251	1,521
Rural Housing Service or Farm Service Agency	7	7	0	3	60	145	78	177	477
Total	9,507	10,791	10,498	7,198	5,228	4,985	4,591	4,424	57,222

³¹ Data are considered “raw” because they contain entry errors and incomplete loan applications. Starting in 2004, the HMDA data made substantive changes in reporting. It modified the way it handled Hispanic data, loan interest rates, and the reporting of multifamily loan applications.

DENIAL RATES

Table 7.D.4
Loan Applications by Action Taken
 7. Canton-Massillon Housing Market Area
 2004–2011 HMDA Data

Action	2004	2005	2006	2007	2008	2009	2010	2011	Total
Loan Originated	5,411	5,789	5,575	4,018	2,895	2,716	2,388	2,194	30,986
Application Approved but not Accepted	545	701	612	305	221	121	133	109	2,747
Application Denied	1,007	1,281	1,193	769	523	398	383	353	5,907
Application Withdrawn by Applicant	482	670	580	330	238	192	199	169	2,860
File Closed for Incompleteness	215	163	155	104	67	36	32	32	804
Loan Purchased by the Institution	1,847	2,173	2,378	1,670	1,284	1,521	1,456	1,567	13,896
Preapproval Request Denied	0	14	5	2	0	1	0	0	22
Preapproval Approved but not Accepted	0	0	0	0	0	0	0	0	0
Total	9,507	10,791	10,498	7,198	5,228	4,985	4,591	4,424	57,222
Denial Rate	15.7%	18.1%	17.6%	16.1%	15.3%	12.8%	13.8%	13.9%	16.0%

Table 7.D.5
Denial Rates by Gender of Applicant
 7. Canton-Massillon Housing Market Area
 2004–2011 HMDA Data

Year	Male	Female	Not Available	Not Applicable	Average
2004	13.0%	18.5%	49.5%	%	15.7%
2005	16.0%	20.6%	39.4%	%	18.1%
2006	16.4%	18.3%	36.6%	%	17.6%
2007	14.3%	17.7%	43.5%	.0%	16.1%
2008	14.0%	17.2%	24.8%	.0%	15.3%
2009	12.8%	12.5%	15.7%	%	12.8%
2010	12.7%	15.6%	17.5%	%	13.8%
2011	13.8%	13.2%	18.1%	100.0%	13.9%
Average	14.5%	17.5%	33.1%	16.7%	16.0%

Table 7.D.6
Loan Applications by Selected Action Taken by Gender of Applicant
 7. Canton-Massillon Housing Market Area
 2004–2011 HMDA Data

Gender		2004	2005	2006	2007	2008	2009	2010	2011	Total
Male	Originated	3,822	4,003	3,849	2,835	2,011	1,817	1,579	1,477	21,393
	Denied	571	762	756	472	328	266	230	236	3,621
	Denial Rate	13.0%	16.0%	16.4%	14.3%	14.0%	12.8%	12.7%	13.8%	14.5%
Female	Originated	1,488	1,643	1,582	1,102	782	808	696	613	8,714
	Denied	337	426	354	237	162	115	129	93	1,853
	Denial Rate	18.5%	20.6%	18.3%	17.7%	17.2%	12.5%	15.6%	13.2%	17.5%
Not Available	Originated	101	143	144	78	100	91	113	104	874
	Denied	99	93	83	60	33	17	24	23	432
	Denial Rate	49.5%	39.4%	36.6%	43.5%	24.8%	15.7%	17.5%	18.1%	33.1%
Not Applicable	Originated	0	0	0	3	2	0	0	0	5
	Denied	0	0	0	0	0	0	0	1	1
	Denial Rate	%	%	%	.0%	.0%	%	%	100.0%	16.7%
Total	Originated	5,411	5,789	5,575	4,018	2,895	2,716	2,388	2,194	30,986
	Denied	1,007	1,281	1,193	769	523	398	383	353	5,907
	Denial Rate	15.7%	18.1%	17.6%	16.1%	15.3%	12.8%	13.8%	13.9%	16.0%

Table 7.D.7
Denial Rates by Race/Ethnicity of Applicant
 7. Canton-Massillon Housing Market Area
 2004–2011 HMDA Data

Race/Ethnicity	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	36.4%	38.9%	40.0%	36.4%	28.6%	.0%	45.5%	14.3%	30.5%
Asian	10.9%	20.5%	8.2%	9.5%	12.0%	20.7%	8.7%	.0%	11.9%
Black	31.3%	31.3%	36.9%	37.3%	31.4%	23.6%	31.8%	17.9%	32.4%
White	13.2%	15.8%	15.5%	13.7%	14.0%	12.1%	12.9%	12.9%	14.1%
Not Available	39.7%	33.6%	33.4%	39.3%	25.3%	21.2%	18.2%	25.3%	32.0%
Not Applicable	22.2%	%	%	.0%	.0%	0%	0%	100.0%	20.0%
Average	15.7%	18.1%	17.6%	16.1%	15.3%	12.8%	13.8%	13.9%	16.0%
Non-Hispanic	13.7%	16.7%	16.3%	14.7%	14.5%	12.4%	13.5%	13.0%	14.8%
Hispanic	29.0%	23.1%	17.0%	24.4%	20.8%	10.3%	9.1%	8.0%	20.6%

Table 7.D.8
Loan Applications by Selected Action Taken by Race/Ethnicity of Applicant
 7. Canton-Massillon Housing Market Area
 2004–2011 HMDA Data

Race		2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Originated	7	11	9	7	5	15	6	6	66
	Denied	4	7	6	4	2	0	5	1	29
	Denial Rate	36.4%	38.9%	40.0%	36.4%	28.6%	45.5%	45.5%	14.3%	30.5%
Asian	Originated	49	31	45	38	22	23	21	16	245
	Denied	6	8	4	4	3	6	2	0	33
	Denial Rate	10.9%	20.5%	8.2%	9.5%	12.0%	20.7%	8.7%	.0%	11.9%
Black	Originated	184	250	198	133	81	55	45	55	1,001
	Denied	84	114	116	79	37	17	21	12	480
	Denial Rate	31.3%	31.3%	36.9%	37.3%	31.4%	23.6%	31.8%	17.9%	32.4%
White	Originated	4,913	5,121	5,042	3,690	2,637	2,515	2,172	1,981	28,071
	Denied	746	962	926	587	431	346	323	293	4,614
	Denial Rate	13.2%	15.8%	15.5%	13.7%	14.0%	12.1%	12.9%	12.9%	14.1%
Not Available	Originated	251	376	281	147	148	108	144	136	1,591
	Denied	165	190	141	95	50	29	32	46	748
	Denial Rate	39.7%	33.6%	33.4%	39.3%	25.3%	21.2%	18.2%	25.3%	32.0%
Not Applicable	Originated	7	0	0	3	2	0	0	0	12
	Denied	2	0	0	0	0	0	0	1	3
	Denial Rate	39.7%	33.6%	33.4%	39.3%	25.3%	21.2%	18.2%	25.3%	20.0%
Total	Originated	5,411	5,789	5,575	4,018	2,895	2,716	2,388	2,194	30,986
	Denied	1,007	1,281	1,193	769	523	398	383	353	5,907
	Denial Rate	15.7%	18.1%	17.6%	16.1%	15.3%	12.8%	13.8%	13.9%	16.0%
Non-Hispanic	Originated	4,653	5,321	5,233	3,846	2,721	2,564	2,204	2,036	28,578
	Denied	741	1,063	1,022	661	460	362	345	304	4,958
	Denial Rate	13.7%	16.7%	16.3%	14.7%	14.5%	12.4%	13.5%	13.0%	14.8%
Hispanic	Originated	71	60	44	31	19	26	30	23	304
	Denied	29	18	9	10	5	3	3	2	79
	Denial Rate	29.0%	23.1%	17.0%	24.4%	20.8%	10.3%	9.1%	8.0%	20.6%

Table 7.D.9
Loan Applications by Reason for Denial
 7. Canton-Massillon Housing Market Area
 2004–2011 HMDA Data

Denial Reason	2004	2005	2006	2007	2008	2009	2010	2011	Total
Debt-to-Income Ratio	104	132	111	103	85	76	73	67	751
Employment History	16	16	21	17	11	18	12	16	127
Credit History	174	273	217	143	121	80	96	72	1,176
Collateral	57	92	123	84	91	66	82	57	652
Insufficient Cash	17	19	21	21	10	14	12	7	121
Unverifiable Information	27	44	32	41	17	13	8	11	193
Credit Application Incomplete	68	90	62	88	39	37	34	56	474
Mortgage Insurance Denied	1	0	0	0	2	3	0	1	7
Other	235	325	216	66	34	26	27	30	959
Missing	308	290	390	206	113	65	39	36	1,447
Total	1,007	1,281	1,193	769	523	398	383	353	5,907

Table 7.D.10
Denial Rates by Income of Applicant
 7. Canton-Massillon Housing Market Area
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	43.6%	50.0%	45.5%	51.7%	44.4%	48.9%	49.0%	63.9%	48.5%
\$15,001–\$30,000	26.1%	29.4%	29.9%	22.9%	25.6%	17.0%	22.3%	19.6%	25.4%
\$30,001–\$45,000	16.0%	18.7%	19.2%	17.4%	16.6%	12.0%	12.6%	14.0%	16.6%
\$45,001–\$60,000	11.7%	14.4%	14.1%	14.5%	12.1%	12.9%	10.5%	10.6%	13.0%
\$60,001–\$75,000	9.0%	14.6%	10.8%	13.4%	10.4%	10.2%	10.8%	13.3%	11.6%
Above \$75,000	8.3%	9.4%	10.4%	10.2%	10.0%	8.1%	8.9%	8.7%	9.4%
Data Missing	31.9%	25.6%	22.6%	21.4%	22.6%	25.9%	27.3%	37.9%	26.7%
Total	15.7%	18.1%	17.6%	16.1%	15.3%	12.8%	13.8%	13.9%	16.0%

Table 7.D.11
Denial Rates of Loans by Race/Ethnicity and Income of Applicant
 7. Canton-Massillon Housing Market Area
 2004–2011 HMDA Data

Race	<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	Above \$75K	Data Missing	Average
American Indian	.0%	71.4%	33.3%	22.2%	27.3%	12.5%	100.0%	30.5%
Asian	.0%	27.5%	13.2%	12.8%	8.0%	6.0%	25.0%	11.9%
Black	55.8%	37.0%	30.2%	28.0%	26.8%	26.5%	63.0%	32.4%
White	48.0%	22.7%	15.0%	11.5%	10.2%	8.3%	19.6%	14.1%
Not Available	52.5%	45.6%	31.8%	28.3%	25.8%	18.7%	63.5%	32.0%
Not Applicable	%	25.0%	%	20.0%	%	.0%	33.3%	20.0%
Average	48.5%	25.4%	16.6%	13.0%	11.6%	9.4%	26.7%	16.0%
Non-Hispanic Ethnicity	47.3%	23.5%	15.5%	12.2%	10.7%	8.7%	21.4%	14.8%
Hispanic (Ethnicity)	88.9%	30.9%	21.0%	14.5%	13.2%	7.9%	28.6%	20.6%

Table 7.D.12
Loan Applications by Reason for Denial by Race/Ethnicity of Applicant
 7. Canton-Massillon Housing Market Area
 2004–2011 HMDA Data

Denial Reason	American Indian	Asian	Black	White	Not Available	Not Applicable	Total	Hispanic (Ethnicity)
Debt-to-Income Ratio	6	6	44	637	58	0	751	10
Employment History	0	0	6	114	7	0	127	3
Credit History	7	8	117	905	139	0	1,176	12
Collateral	3	1	45	544	59	0	652	6
Insufficient Cash	2	0	6	97	16	0	121	1
Unverifiable Information	0	3	25	142	23	0	193	3
Credit Application Incomplete	4	5	23	381	61	0	474	2
Mortgage Insurance Denied	0	0	2	5	0	0	7	0
Other	1	5	73	746	132	2	959	10
Missing	6	5	139	1,043	253	1	1,447	32
Total	29	33	480	4,614	748	3	5,907	79
% Missing	20.7%	15.2%	29.0%	22.6%	33.8%	33.3%	24.5%	40.5%

Table 7.D.13
Loan Applications by Income of Applicant: Originated and Denied
 7. Canton-Massillon Housing Market Area
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Loan Originated	57	52	42	28	30	24	26	13	272
	Application Denied	44	52	35	30	24	23	25	23	256
	Denial Rate	43.6%	50.0%	45.5%	51.7%	44.4%	48.9%	49.0%	63.9%	48.5%
\$15,001–\$30,000	Loan Originated	904	923	848	623	398	514	408	345	4,963
	Application Denied	320	384	361	185	137	105	117	84	1,693
	Denial Rate	26.1%	29.4%	29.9%	22.9%	25.6%	17.0%	22.3%	19.6%	25.4%
\$30,001–\$45,000	Loan Originated	1,375	1,481	1,437	999	731	726	587	552	7,888
	Application Denied	261	340	341	210	146	99	85	90	1,572
	Denial Rate	16.0%	18.7%	19.2%	17.4%	16.6%	12.0%	12.6%	14.0%	16.6%
\$45,001–\$60,000	Loan Originated	1,151	1,229	1,130	800	615	486	444	395	6,250
	Application Denied	153	207	186	136	85	72	52	47	938
	Denial Rate	11.7%	14.4%	14.1%	14.5%	12.1%	12.9%	10.5%	10.6%	13.0%
\$60,001–\$75,000	Loan Originated	711	745	688	496	362	336	313	254	3,905
	Application Denied	70	127	83	77	42	38	38	39	514
	Denial Rate	9.0%	14.6%	10.8%	13.4%	10.4%	10.2%	10.8%	13.3%	11.6%
Above \$75,000	Loan Originated	1,083	1,231	1,307	1,017	735	610	586	617	7,186
	Application Denied	98	127	151	116	82	54	57	59	744
	Denial Rate	8.3%	9.4%	10.4%	10.2%	10.0%	8.1%	8.9%	8.7%	9.4%
Data Missing	Loan Originated	130	128	123	55	24	20	24	18	522
	Application Denied	61	44	36	15	7	7	9	11	190
	Denial Rate	31.9%	25.6%	22.6%	21.4%	22.6%	25.9%	27.3%	37.9%	26.7%
Total	Loan Originated	5,411	5,789	5,575	4,018	2,895	2,716	2,388	2,194	30,986
	Application Denied	1,007	1,281	1,193	769	523	398	383	353	5,907
	Denial Rate	15.7%	18.1%	17.6%	16.1%	15.3%	12.8%	13.8%	13.9%	16.0%

Table 7.D.14
Loan Applications by Income and Race/Ethnicity of Applicant: Originated and Denied
 7. Canton-Massillon Housing Market Area
 2004–2011 HMDA Data

Race		<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	> \$75K	Data Missing	Total
American Indian	Loan Originated	1	4	18	7	8	28	0	66
	Application Denied	0	10	9	2	3	4	1	29
	Denial Rate	.0%	71.4%	33.3%	22.2%	27.3%	12.5%	100.0%	30.5%
Asian	Loan Originated	4	29	33	41	23	109	6	245
	Application Denied	0	11	5	6	2	7	2	33
	Denial Rate	.0%	27.5%	13.2%	12.8%	8.0%	6.0%	25.0%	11.9%
Black	Loan Originated	19	281	266	188	93	144	10	1,001
	Application Denied	24	165	115	73	34	52	17	480
	Denial Rate	55.8%	37.0%	30.2%	28.0%	26.8%	26.5%	63.0%	32.4%
White	Loan Originated	229	4,385	7,189	5,726	3,588	6,481	473	28,071
	Application Denied	211	1,287	1,265	744	408	584	115	4,614
	Denial Rate	48.0%	22.7%	15.0%	11.5%	10.2%	8.3%	19.6%	14.1%
Not Available	Loan Originated	19	261	382	284	193	421	31	1,591
	Application Denied	21	219	178	112	67	97	54	748
	Denial Rate	52.5%	45.6%	31.8%	28.3%	25.8%	18.7%	63.5%	32.0%
Not Applicable	Loan Originated	0	3	0	4	0	3	2	12
	Application Denied	0	1	0	1	0	0	1	3
	Denial Rate	%	25.0%	%	20.0%	%	.0%	33.3%	20.0%
Total	Loan Originated	272	4,963	7,888	6,250	3,905	7,186	522	30,986
	Application Denied	256	1,693	1,572	938	514	744	190	5,907
	Denial Rate	48.5%	25.4%	16.6%	13.0%	11.6%	9.4%	26.7%	16.0%
Non-Hispanic Ethnicity	Loan Originated	248	4,551	7,325	5,807	3,624	6,561	462	28,578
	Application Denied	223	1,401	1,343	804	434	627	126	4,958
	Denial Rate	47.3%	23.5%	15.5%	12.2%	10.7%	8.7%	21.4%	14.8%
Hispanic (Ethnicity)	Loan Originated	1	67	64	47	33	82	10	304
	Application Denied	8	30	17	8	5	7	4	79
	Denial Rate	88.9%	30.9%	21.0%	14.5%	13.2%	7.9%	28.6%	20.6%

PREDATORY LENDING

Table 7.D.15
Originated Owner-Occupied Loans by HAL Status
 7. Canton-Massillon Housing Market Area
 2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Other	4,679	4,116	4,147	3,487	2,493	2,507	2,376	2,186	25,991
HAL	732	1,673	1,428	531	402	209	12	8	4,995
Total	5,411	5,789	5,575	4,018	2,895	2,716	2,388	2,194	30,986
Percent HAL	13.5%	28.9%	25.6%	13.2%	13.9%	7.7%	.5%	.4%	16.1%

Table 7.D.16
Loans by Loan Purpose by HAL Status
 7. Canton-Massillon Housing Market Area
 2004–2011 HMDA Data

Loan Purpose		2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	Other	4,679	4,116	4,147	3,487	2,493	2,507	2,376	2,186	25,991
	HAL	732	1,673	1,428	531	402	209	12	8	4,995
	Percent HAL	13.5%	28.9%	25.6%	13.2%	13.9%	7.7%	.5%	.4%	16.1%
Home Improvement	Other	590	593	812	611	527	270	276	290	3,969
	HAL	245	281	327	255	139	68	45	32	1,392
	Percent HAL	29.3%	32.2%	28.7%	29.4%	20.9%	20.1%	14.0%	9.9%	26.0%
Refinancing	Other	6,615	4,679	3,889	3,193	2,484	4,774	4,977	4,202	34,813
	HAL	1,673	2,333	2,100	997	560	387	58	57	8,165
	Percent HAL	20.2%	33.3%	35.1%	23.8%	18.4%	7.5%	1.2%	1.3%	19.0%
Total	Other	11,884	9,388	8,848	7,291	5,504	7,551	7,629	6,678	64,773
	HAL	2,650	4,287	3,855	1,783	402	209	12	8	14,552
	Percent HAL	18.2%	31.3%	30.3%	19.6%	16.7%	8.1%	1.5%	1.4%	18.3%

Table 7.D.17
HALs Originated by Race of Borrower
 7. Canton-Massillon Housing Market Area
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	1	4	1	0	1	2	0	0	9
Asian	2	9	6	7	3	2	0	0	29
Black	57	132	107	40	11	9	0	0	356
White	583	1,344	1,198	461	362	191	10	8	4,157
Not Available	88	184	116	23	25	5	2	0	443
Not Applicable	1	0	0	0	0	0	0	0	1
Total	732	1,673	1,428	531	402	209	12	8	4,995
Hispanic (Ethnicity)	19	24	11	3	1	3	0	0	61

Table 7.D.18
Rate of HALs Originated by Race/Ethnicity of Borrower
 7. Canton-Massillon Housing Market Area
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	14.3%	36.4%	11.1%	.0%	20.0%	13.3%	.0%	.0%	13.6%
Asian	4.1%	29.0%	13.3%	18.4%	13.6%	8.7%	.0%	.0%	11.8%
Black	31.0%	52.8%	54.0%	30.1%	13.6%	16.4%	.0%	.0%	35.6%
White	11.9%	26.2%	23.8%	12.5%	13.7%	7.6%	.5%	.4%	14.8%
Not Available	35.1%	48.9%	41.3%	15.6%	16.9%	4.6%	1.4%	.0%	27.8%
Not Applicable	14.3%	%	%	.0%	.0%	%	%	%	8%
Average	13.5%	28.9%	25.6%	13.2%	13.9%	7.7%	0.5%	0.4%	16.1%
Non-Hispanic Ethnicity	12.7%	27.4%	24.9%	13.1%	13.7%	7.8%	.5%	.4%	15.6%
Hispanic (Ethnicity)	26.8%	40.0%	25.0%	9.7%	5.3%	11.5%	.0%	.0%	20.1%

Table 7.D.19
Loans by HAL Status by Race/Ethnicity of Borrower
 7. Canton-Massillon Housing Market Area
 2004–2011 HMDA Data

Race	Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Other	6	7	8	7	4	13	6	6	57
	HAL	1	4	1	0	1	2	0	0	9
	Percent HAL	14.3%	36.4%	11.1%	.0%	20.0%	13.3%	.0%	.0%	13.6%
Asian	Other	47	22	39	31	19	21	21	16	216
	HAL	2	9	6	7	3	2	0	0	29
	Percent HAL	4.1%	29.0%	13.3%	18.4%	13.6%	8.7%	.0%	.0%	11.8%
Black	Other	127	118	91	93	70	46	45	55	645
	HAL	57	132	107	40	11	9	0	0	356
	Percent HAL	31.0%	52.8%	54.0%	30.1%	13.6%	16.4%	.0%	.0%	35.6%
White	Other	4,330	3,777	3,844	3,229	2,275	2,324	2,162	1,973	23,914
	HAL	583	1,344	1,198	461	362	191	10	8	4,157
	Percent HAL	11.9%	26.2%	23.8%	12.5%	13.7%	7.6%	0.5%	0.4%	14.8%
Not Available	Other	163	192	165	124	123	103	142	136	1,148
	HAL	88	184	116	23	25	5	2	0	443
	Percent HAL	35.1%	48.9%	41.3%	15.6%	16.9%	4.6%	1.4%	.0%	27.8%
Not Applicable	Other	6	0	0	3	2	0	0	0	11
	HAL	1	0	0	0	0	0	0	0	1
	Percent HAL	14.3%	%	%	.0%	.0%	%	%	%	8.0%
Total	Other	4,679	4,116	4,147	3,487	2,493	2,507	2,376	2,186	25,991
	HAL	732	1,673	1,428	531	402	209	12	8	4,995
	Percent HAL	13.5%	28.9%	25.6%	13.2%	13.9%	7.7%	.5%	.4%	16.1%
Non-Hispanic Ethnicity	Other	4,062	3,865	3,930	3,343	2,348	2,364	2,194	2,028	24,134
	HAL	591	1,456	1,303	503	373	200	10	8	4,444
	Percent HAL	12.7%	27.4%	24.9%	13.1%	13.7%	7.8%	.5%	.4%	15.6%
Hispanic (Ethnicity)	Other	52	36	33	28	18	23	30	23	243
	HAL	19	24	11	3	1	3	0	0	61
	Percent HAL	26.8%	40.0%	25.0%	9.7%	5.3%	11.5%	.0%	.0%	20.1%

Table 7.D.20
Rates of HALs by Income of Borrower
 7. Canton-Massillon Housing Market Area
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Average
\$15,000 or Below	17.5%	40.4%	33.3%	32.1%	6.7%	12.5%	.0%	.0%	21.7%
\$15,001–\$30,000	20.6%	41.8%	36.0%	21.5%	24.9%	11.7%	1.0%	.9%	23.7%
\$30,001–\$45,000	16.7%	34.1%	30.4%	14.8%	15.7%	7.0%	.5%	.2%	18.9%
\$45,001–\$60,000	15.1%	29.0%	27.1%	12.8%	13.2%	9.3%	.2%	.5%	17.1%
\$60,001–\$75,000	7.9%	22.7%	22.8%	9.7%	11.9%	5.1%	.3%	.0%	12.6%
Above \$75,000	6.0%	16.5%	12.7%	7.3%	8.3%	5.2%	0.5%	.3%	8.4%
Data Missing	9.2%	25.0%	35.0%	29.1%	4.2%	5.0%	.0%	.0%	20.1%
Average	13.5%	28.9%	25.6%	13.2%	13.9%	7.7%	.5%	.4%	16.1%

Table 7.D.21
Loans by HAL Status by Income of Borrower
 7. Canton-Massillon Housing Market Area
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Other	47	31	28	19	28	21	26	13	213
	HAL	10	21	14	9	2	3	0	0	59
	Percent HAL	17.5%	40.4%	33.3%	32.1%	6.7%	12.5%	.0%	.0%	21.7%
\$15,001–\$30,000	Other	718	537	543	489	299	454	404	342	3,786
	HAL	186	386	305	134	99	60	4	3	1,177
	Percent HAL	20.6%	41.8%	36.0%	21.5%	24.9%	11.7%	1.0%	.9%	23.7%
\$30,001–\$45,000	Other	1,146	976	1,000	851	616	675	584	551	6,399
	HAL	229	505	437	148	115	51	3	1	1,489
	Percent HAL	16.7%	34.1%	30.4%	14.8%	15.7%	7.0%	.5%	.2%	18.9%
\$45,001–\$60,000	Other	977	872	824	698	534	441	443	393	5,182
	HAL	174	357	306	102	81	45	1	2	1,068
	Percent HAL	15.1%	29.0%	27.1%	12.8%	13.2%	9.3%	.2%	.5%	17.1%
\$60,001–\$75,000	Other	655	576	531	448	319	319	312	254	3,414
	HAL	56	169	157	48	43	17	1	0	491
	Percent HAL	7.9%	22.7%	22.8%	9.7%	11.9%	5.1%	.3%	.0%	12.6%
Above \$75,000	Other	1,018	1,028	1,141	943	674	578	583	615	6,580
	HAL	65	203	166	74	61	32	3	2	606
	Percent HAL	6.0%	16.5%	12.7%	7.3%	8.3%	5.2%	.5%	.3%	8.4%
Data Missing	Other	118	96	80	39	23	19	24	18	417
	HAL	12	32	43	16	1	1	0	0	105
	Percent HAL	9.2%	25.0%	35.0%	29.1%	4.2%	5.0%	.0%	.0%	20.1%
Total	Other	4,679	4,116	4,147	3,487	2,493	2,507	2,376	2,186	25,991
	HAL	732	1,673	1,428	531	402	209	12	8	4,995
	Percent HAL	13.5%	28.9%	25.6%	13.2%	13.9%	7.7%	.5%	.4%	16.1%

E. CRA DATA

Additional data tables related to Community Reinvestment Act (CRA) data are presented in this section.

Table 7.E.1
Small Business Loans Originated: \$100,000 or Less by Tract MFI
 7. Canton-Massillon Housing Market Area
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	258	611	3,299	1,750		5,918
2001	472	729	3,477	1,882		6,560
2002	343	692	3,907	2,047		6,989
2003	262	855	3,872	1,955		6,944
2004	253	875	3,875	1,947		6,950
2005	236	867	4,400	2,263		7,766
2006	301	1,081	5,450	3,006		9,838
2007	305	1,154	6,056	3,313		10,828
2008	231	870	4,564	2,444		8,109
2009	86	285	1,706	1,081		3,158
2010	80	364	1,686	1,005		3,135
2011	112	417	2,240	1,309		4,078
Total	2,939	8,800	44,532	24,002	0	80,273
Loan Amount (\$1,000s)						
2000	3,190	7,555	44,492	25,748		80,985
2001	6,459	7,940	39,100	24,172		77,671
2002	4,123	7,839	42,545	24,946		79,453
2003	3,330	9,212	39,891	20,211		72,644
2004	2,541	9,008	39,313	22,067		72,929
2005	3,275	9,628	46,225	25,841		84,969
2006	3,587	11,140	56,265	34,290		105,282
2007	2,789	12,253	60,381	36,166		111,589
2008	2,904	8,504	42,920	24,681		79,009
2009	1,764	4,012	19,985	13,395		39,156
2010	1,334	6,439	24,430	14,194		46,397
2011	1,598	6,935	33,570	19,981		62,084
Total	36,894	100,465	489,117	285,692	0	912,168

Table 7.E.2
Small Business Loans Originated: \$100,001 to \$250,000 by Tract MFI
 7. Canton-Massillon Housing Market Area
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	16	39	125	102		282
2001	27	18	134	93		272
2002	26	17	140	106		289
2003	11	46	126	90		273
2004	13	44	136	71		264
2005	18	38	135	68		259
2006	8	32	149	64		253
2007	11	23	94	54		182
2008	7	21	64	51		143
2009	4	24	63	51		142
2010	6	27	88	55		176
2011	4	28	92	61		185
Total	151	357	1,346	866	0	2,720
Loan Amount (\$1,000s)						
2000	2,571	6,834	21,863	17,547		48,815
2001	4,660	3,210	23,181	15,411		46,462
2002	4,824	3,252	24,157	17,852		50,085
2003	1,655	7,888	21,252	15,095		45,890
2004	2,238	7,919	23,836	12,064		46,057
2005	3,259	6,991	24,443	11,229		45,922
2006	1,313	6,033	25,095	11,309		43,750
2007	1,990	4,113	15,795	9,378		31,276
2008	918	4,218	10,673	9,176		24,985
2009	720	4,140	11,313	9,331		25,504
2010	1,013	5,456	14,836	9,421		30,726
2011	721	5,058	16,238	10,436		32,453
Total	25,882	65,112	232,682	148,249	0	471,925

Table 7.E.3
Small Business Loans Originated: More than \$250,000 by Tract MFI
 7. Canton-Massillon Housing Market Area
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	8	21	107	92		228
2001	15	22	126	82		245
2002	31	31	155	122		339
2003	10	33	165	99		307
2004	13	51	163	134		361
2005	15	35	136	77		263
2006	9	34	137	85		265
2007	5	30	97	55		187
2008	4	23	65	42		134
2009	5	21	70	60		156
2010	7	29	100	73		209
2011	7	29	100	59		195
Total	129	359	1,421	980	0	2,889
Loan Amount (\$1,000s)						
2000	4,210	8,743	51,571	43,690		108,214
2001	6,501	11,659	63,888	37,239		119,287
2002	14,991	14,757	83,127	64,660		177,535
2003	5,760	18,738	87,278	53,832		165,608
2004	7,352	26,931	92,025	71,737		198,045
2005	8,791	17,348	76,379	40,731		143,249
2006	4,603	17,723	72,757	45,117		140,200
2007	3,300	17,147	54,468	31,063		105,978
2008	3,050	12,549	35,753	25,841		77,193
2009	2,939	11,464	37,664	33,684		85,751
2010	4,325	16,006	54,684	40,885		115,900
2011	3,819	18,173	49,490	32,826		104,308
Total	69,641	191,238	759,084	521,305	0	1,541,268

Table 7.E.4
Small Business Loans to Businesses with Gross Annual Revenues of Less Than
\$1 Million by Tract MFI
 7. Canton-Massillon Housing Market Area
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	87	303	1,213	707		2,310
2001	172	283	1,241	864		2,560
2002	115	176	1,010	674		1,975
2003	85	267	1,225	661		2,238
2004	72	307	1,228	631		2,238
2005	110	361	1,890	1,024		3,385
2006	107	371	2,124	1,146		3,748
2007	96	395	2,160	1,211		3,862
2008	70	249	1,394	699		2,412
2009	33	104	590	367		1,094
2010	37	153	636	352		1,178
2011	39	173	1,040	609		1,861
Total	1,023	3,142	15,751	8,945	0	28,861
Loan Amount (\$1,000s)						
2000	2,524	9,561	47,075	37,092		96,252
2001	7,028	8,503	48,564	39,145		103,240
2002	6,982	9,372	53,816	48,491		118,661
2003	3,629	10,450	60,544	40,405		115,028
2004	1,723	12,319	50,015	34,150		98,207
2005	4,956	11,744	53,437	30,545		100,682
2006	2,931	10,543	58,052	37,558		109,084
2007	1,488	10,731	41,479	31,180		84,878
2008	1,770	4,707	29,495	23,108		59,080
2009	1,154	5,479	16,537	18,174		41,344
2010	2,206	8,496	24,005	21,761		56,468
2011	1,067	3,871	35,114	20,919		60,971
Total	37,458	105,776	518,133	382,528	0	1,043,895

F. COMPLAINT DATA

This section contains data regarding fair housing complaints, as provided by the U.S. Department of Housing and Urban Development (HUD), the Ohio Civil Rights Commission (OCRC), and the Fair Housing Contact Service (FHCS).

HUD COMPLAINTS

Table 7.F.1
Fair Housing Complaints by Basis
 7. Canton-Massillon Housing Market Area
 2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color				3	1	1	1			6
Disability	3	5	21	4	7	12	29	9	10	100
Family Status	2	2	3	8	3	13	9	5	6	51
National Origin	1	2					6		1	10
Race	10	4	6	9	4	12	17	5	7	74
Religion			1		1	1				3
Sex			3		2	3	2	1	1	12
Total Bases	16	13	34	24	18	42	64	20	25	256
Total Complaints	14	13	31	20	15	33	51	19	23	219

Table 7.F.2
Fair Housing Complaints by Issue
 7. Canton-Massillon Housing Market Area
 2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Discrimination in terms, conditions or privileges relating to rental	1	3	4	2	3	8	17	1	4	43
Discriminatory terms, conditions, privileges, or services and facilities	1	2	3	3	6	5	9	6	5	40
Discriminatory refusal to rent	3	2	7	7	1	6	3	4	4	37
Failure to make reasonable accommodation	2	2	1	3	1		17	3	3	32
Discriminatory refusal to rent and negotiate for rental	1	2		4	1	3	18		2	31
Discriminatory acts under Section 818 (coercion, etc.)		1	2		1	6	9	2	2	23
Non-compliance with design and construction requirements (handicap)			9					3	2	14
Discriminatory advertisement - rental						5		3	3	11
Otherwise deny or make housing available	1		1		1	1		2	3	9
Failure to provide accessible and usable public and common user areas		1	8							9
Other discriminatory acts	2		1		1	1	1		2	8
Discriminatory advertising, statements, and notices				2	1	2	1		1	7
Discriminatory refusal to negotiate for rental			1	2			2	1		6
Discrimination in services and facilities relating to rental	1		1			2	1		1	6
False denial or representation of availability - rental				1		2		1		4
Steering				2			1			3
Failure to provide an accessible building entrance			3							3
Failure to provide an accessible route into and thru the covered unit			3							3
Failure to permit reasonable modification			1					1	1	3
Discrimination in making of loans	1							1		2
Adverse action against an employee						2				2
Discriminatory refusal to sell							1			1
False denial or representation of availability - sale							1			1
Discriminatory financing (includes real estate transactions)					1					1
Discrimination in the terms or conditions for making loans									1	1
Discrimination in the brokering of residential real property			1							1
Discrimination in terms, conditions, privileges relating to sale	1									1
Redlining	1									1
Restriction of choices relative to a sale	1									1
Failure to provide usable doors			1							1
Total Issues	16	14	46	26	17	43	81	28	34	305
Total Complaints	14	13	31	20	15	33	51	19	23	219

Table 7.F.3
Fair Housing Complaints by Closure Status
 7. Canton-Massillon Housing Market Area
 2004–2012 HUD Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Administrative Closure Cause (FHAP)	2	1	1	2	5	5	4	1	2	23
Conciliated / Settled	1	1	12	2		11	9	4		40
No Cause	5	5	7	8	2	7	23	7	6	70
Open	6	6	11	8	8	10	14	3		66
							1	4	15	20
Total Complaints	14	13	31	20	15	33	51	19	23	219

HUD Complaints Found With Cause

Table 7.F.4
Fair Housing Complaints Found With Cause by Basis
 7. Canton-Massillon Housing Market Area
 2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color				2		1	1			4
Disability	2	3	15	2	1	4	26	6		59
Family Status	2	1	2	6	1	10	3	4	3	32
National Origin	1	1					1			3
Race	2	2	2	3		6	3	1	3	22
Religion						1				1
Sex						2	2	1		5
Total Bases	7	7	19	13	2	24	36	12	6	126
Total Complaints	6	6	19	10	2	18	32	11	6	110

Table 7.F.5
Fair Housing Complaints Found With Cause by Issue
 7. Canton-Massillon Housing Market Area
 2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Failure to make reasonable accommodation	2	2		1			17	3		25
Discriminatory refusal to rent and negotiate for rental	1			4		2	17			24
Discriminatory refusal to rent	3	1	2	4	1	4	2	3	2	22
Discrimination in terms, conditions or privileges relating to rental	1	1	2			4	10	1	1	20
Discriminatory terms, conditions, privileges, or services and facilities		1	3			3	4	2	2	15
Discriminatory acts under Section 818 (coercion, etc.)		1			1	3	3	1	1	10
Non-compliance with design and construction requirements (handicap)			7							7
Failure to provide accessible and usable public and common user areas		1	6							7
Discriminatory advertisement - rental						2		2	2	6
Discriminatory refusal to negotiate for rental				2			2	1		5
Discriminatory advertising, statements, and notices				2		2	1			5
False denial or representation of availability - rental				1		1		1		3
Discrimination in services and facilities relating to rental						2	1			3
Steering				2			1			3
Failure to provide an accessible building entrance			3							3
Failure to provide an accessible route into and thru the covered unit			3							3
Adverse action against an employee						2				2
Failure to permit reasonable modification			1					1		2
Otherwise deny or make housing available						1				1
Other discriminatory acts						1				1
Failure to provide usable doors			1							1
Total Issues	7	7	28	16	2	27	58	15	8	168
Total Complaints	6	6	19	10	2	18	32	11	6	110

OHIO CIVIL RIGHTS COMMISSION COMPLAINTS

Table 7.F.6
Fair Housing Complaints by Basis
 7. Canton-Massillon Housing Market Area
 2004–2012 OCRRC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color	3		1		1	1	7		2	15
Disability	6	2	25	7	8	18	22	8		96
Family Status	3		3	6	2	10	3	2	2	31
Gender	1		4			3		4	1	13
National Origin		2	1		1	1	1	3	1	10
Race	8	6	7	10	8	8	8	5	4	59
Religion			1		1		1			3
Retaliation		3	4	2	2	2	1	5		19
Other			2							2
Total Bases	21	13	48	25	18	43	43	27	10	248
Total Complaints	17	10	34	21	13	34	34	17	7	187

Table 7.F.7
Fair Housing Complaints by Issue
 7. Canton-Massillon Housing Market Area
 2004–2012 OCRRC Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Advertising	3							2	2	7
Exclusion	1					1				2
Harassment	1		2				4	1		8
Intimidation			6	2	4	1	7	5	1	26
Other	13	5	8	2	1	5	2	5	5	46
Reasonable Accommodation	1	3	9			1	12	3		29
Sexual Harassment	1					1				2
Terms and Conditions	4	2	23	20	13	28	24	9	3	126
Total Issues	24	10	48	24	18	37	49	25	11	246
Total Complaints	17	10	34	21	13	34	34	17	7	187

Table 7.F.8
Fair Housing Complaints by Closure Status
 7. Canton-Massillon Housing Market Area
 2004–2012 OCRRC Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Administrative Closure					5	8	1	2		16
CP Failed to Cooperate				1		1	2	1	1	6
CP Withdrawal – No Benefit	3	1			1		2	1		8
Failure to Locate Charging Party			1							1
No Cause Finding Issued	7	7	9	10	6	7	10	4		60
No Jurisdiction								3	1	4
Open Charge Closed By Legal Activity			1			5				6
Settlement With Benefits	5		14	2		6	11	5	4	47
Successful Conciliation			6			5	7	1		19
Withdrawal With Benefits	2	2	3	8	1	2	1		1	20
Total Complaints	17	10	34	21	13	34	34	17	7	187

FAIR HOUSING CONTACT SERVICE COMPLAINTS

Table 7.F.9
Fair Housing Complaints by Basis
 7. Canton-Massillon Housing Market Area
 2004–2012 FHCS Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Ancestry									1	1
Color			1							1
Criminal Background									1	1
Disability			3	1	3	4	19	5	3	38
Familial Status			1	5	6	4		8	6	30
National Origin			1		1					2
Race	1		3		4					8
Retaliation				1		5	1			7
Sex									2	2
Other						1	1			2
Total Bases	1	0	9	7	14	14	21	13	13	92
Total Complaints	1		7	6	13	11	21	13	10	82

Table 7.F.10
Fair Housing Complaints by Closure Status
 7. Canton-Massillon Housing Market Area
 2004–2012 FHCS Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
----------------	------	------	------	------	------	------	------	------	------	-------

Closed			3	3			3			9
Elected not to pursue					1			1	2	4
Independently resolved					1	1				2
Inquiry	2	1	1						2	6
Lack of jurisdiction				2						2
No contact						1	3			4
No probable cause	2	1	3		2					8
Pending	1				1		1	2		5
Probable cause					3	7	5	1		16
Reasonable accommodation granted						1				1
Referred for other assistance						1				1
Settled	2				3	7	3	3		18
Settled through OCRC				3						3
Withdrawal of Charge				1						1
Missing	1		1							2
Total Complaints	1	0	7	6	13	11	21	13	10	82

G. FAIR HOUSING SURVEY FOR HOUSING STAKEHOLDERS DATA

This section presents public involvement data gathered through the 2012–2013 Fair Housing Survey for Housing Stakeholders.

Table 7.G.1

Primary Role of Respondent

7. Canton-Massillon Housing Market Area
2012–2013 Fair Housing Survey for Housing Stakeholders Data

Primary Role	Total
Advocate/Service Provider	1
Construction/Development	1
Law/Legal Services	2
Local Government	2
Other Role	1
Total	7

FEDERAL, STATE, AND LOCAL LAWS

Table 7.G.2

Familiarity with Fair Housing Laws

7. Canton-Massillon Housing Market Area
2012–2013 Fair Housing Survey for Housing Stakeholders Data

Familiarity	Total
Not Familiar	1
Somewhat Familiar	1
Very Familiar	3
Missing	2
Total	7

Table 7.G.3
Perceptions About Fair Housing Laws

7. Canton-Massillon Housing Market Area
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?	5			2	7
Are fair housing laws difficult to understand or follow?	2	3		2	7
Do you think fair housing laws should be changed?	2	2	1	2	7
Do you think fair housing laws are adequately enforced?	5			2	7

Table 7.G.4
Fair Housing Activities

7. Canton-Massillon Housing Market Area
2012–2013 Fair Housing Survey for Housing Stakeholders Data

2012-2016 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?		5			2	7
Have you participated in fair housing training?		5			2	7
Are you aware of any fair housing testing?		3	1	1	2	7
Testing and education	Too Little	Right Amount	Too Much	Don't Know	Missing	Total
Is there sufficient outreach and education activity?	4	1			2	7
Is there sufficient testing?	3	1		1	2	7

Table 7.G.5

Protected Classes

7. Canton-Massillon Housing Market Area
2012–2013 Fair Housing Survey for Housing Stakeholders Data

Protected Class	Total
Family Status	3
Religion	1
Gender	2
National Origin	1
Color	2
Sexual Orientation	2
Age	1
Military	3
Ancestry	1
Other	2
Total	18

Table 7.G.6

Fair Housing Violation Referrals

7. Canton-Massillon Housing Market Area
2012–2013 Fair Housing Survey for Housing Stakeholders Data

Referral	Total
City	1
City of Canton Fair Housing	2
Legal Aid	1
Stark County Fair Housing Department	2
Total	6

LOCAL FAIR HOUSING

Table 7.G.7

Local Fair Housing

7. Canton-Massillon Housing Market Area
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?	4	1		2	7
Are there any specific geographic areas that have fair housing problems?	3	1	1	2	7
Are there any specific groups in that face housing discrimination?	3		2	2	7

FAIR HOUSING IN THE PRIVATE SECTOR

Table 7.G.8

Barriers to Fair Housing in the Private Sector

7. Canton-Massillon Housing Market Area
2012–2013 Fair Housing Survey for Housing Stakeholders Data

Question	Yes	No	Don't Know	Missing	Total
Are you aware of any questionable practices or barriers to fair housing choice in:					
The rental housing market?	4		1	2	7
The real estate industry?	1	1	3	2	7
The mortgage and home lending industry?	1	1	3	2	7
The housing construction or accessible housing design fields?		2	3	2	7
The home insurance industry?		1	4	2	7
The home appraisal industry?	1	1	3	2	7
Any other housing services?		1	4	2	7

FAIR HOUSING IN THE PUBLIC SECTOR

Table 7.G.9

Barriers to Fair Housing in the Public Sector

7. Canton-Massillon Housing Market Area
2012–2013 Fair Housing Survey for Housing Stakeholders Data

Question	Yes	No	Don't Know	Missing	Total
Are you aware of any questionable practices or barriers to fair housing choice in:					
Land use policies?	1	2	2	2	7
Zoning laws?	1	2	2	2	7
Occupancy standards or health and safety codes?		2	3	2	7
Property tax policies?		2	3	2	7
Permitting process?		2	3	2	7
Housing construction standards?		2	3	2	7
Neighborhood or community development policies?		2	3	2	7
Limited access to government services, such as employment services?	2	2	1	2	7
Public administrative actions or regulations?		1	4	2	7

NARRATIVE COMMENTS

Federal, State, and Local Laws

Table 7.G.10

How did you become aware of fair housing laws?

7. Canton-Massillon Housing Market Area
2013 Fair Housing Survey Data

Comments:
I have taken trainings and read in this area.

Table 7.G.11
How should fair housing laws be changed?

7. Canton-Massillon Housing Market Area
 2013 Fair Housing Survey Data

Comments:
I think source of income and sexual orientation should be federally protected classes. Include sexual orientation/identity

Local Fair Housing

Table 7.G.12
Are there any specific geographic areas that have fair housing problems?

7. Canton-Massillon Housing Market Area
 2013 Fair Housing Survey Data

Comments:
In Alliance I have known of issues. These areas include the SE sides of town and parts of the NE and NW

Table 7.G.13
Are there any specific groups in that face housing discrimination?

7. Canton-Massillon Housing Market Area
 2013 Fair Housing Survey Data

Comments:
Minorities and women with children Race, color, disability, familial status especially. People refusing to rent or grant accommodations. The southeast side of Canton is very segregated and reserved for mainly low-income individuals. Historically in Canton, this is where the African-American community has been displaced and forced to be there.

Table 7.G.14
Please share any additional comments.

7. Canton-Massillon Housing Market Area
 2013 Fair Housing Survey Data

Comments:
I encourage Fair Housing groups to continue to educate the community, advocate, and promote Fair Housing laws. n/a

Fair Housing in the Private Sector**Table 7.G.15****Are you aware of any questionable practices or barriers to fair housing choice in the rental housing market?**7. Canton-Massillon Housing Market Area
2013 Fair Housing Survey Data

Comments:
Landlords have been known to discriminate against formerly homeless individuals Some barriers include racial make up of different communities within the immediate vicinity of Canton There are still people that discriminate on the basis of disability and race especially. There is a lack of availability of affordable housing in areas of opportunity.

Table 7.G.16**Are you aware of any questionable practices or barriers to fair housing choice in the real estate industry?**7. Canton-Massillon Housing Market Area
2013 Fair Housing Survey Data

Comments:
I know some minorities who do not feel welcomed to live in certain parts of the county.

Table 7.G.17**Are you aware of any questionable practices or barriers to fair housing choice in the mortgage and home lending industry?**7. Canton-Massillon Housing Market Area
2013 Fair Housing Survey Data

Comments:
More minorities are denied loans for mortgages.

Table 7.G.18**Are you aware of any questionable practices or barriers to fair housing choice in the home appraisal industry?**7. Canton-Massillon Housing Market Area
2013 Fair Housing Survey Data

Comments:
It seems that race is associated with lower neighborhood values. Perhaps, it is by coincidence that high crime rates are cited as factors creating lower values.

Fair Housing in the Public Sector**Table 7.G.19****Are you aware of any questionable practices or barriers to fair housing choice in zoning laws?**7. Canton-Massillon Housing Market Area
2013 Fair Housing Survey Data

Comments:
Problems with group homes in residential communities.

Table 7.G.20**Are you aware of any barriers that limit access to government services, such as a lack of transportation or employment services?**7. Canton-Massillon Housing Market Area
2013 Fair Housing Survey Data

Comments:
At times the phones are difficult to get through on and if people work during the day, they are unable to get a hold of someone in the evening.

H. LAND USE PLANNING SURVEY DATA

This section contains data regarding the potential effects of local land use and housing policies on fair housing choice, as gathered from the Fair Housing Survey for Government Officials.

FAIR HOUSING SURVEY FOR GOVERNMENT OFFICIALS

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 was conducted predominately online. Respondents were solicited by mass-distributed emails sent by the NEOSCC, members of the Progress Review Team, and other various organizations in the 12-county region.

This section contains data gathered from the public sector staff in the Canton-Massillon Housing Market Area that received and completed the survey.³²

Table 7.H.1
Housing Development
 7. Canton-Massillon Housing Market Area
 2012 Fair Housing Survey for Government Officials Data

Question: Does your jurisdiction have...	Yes	No	Don't Know	Missing	Total
Housing Development					
Definitions for "dwelling unit" or "residential unit"?	1	1	0	2	4
Guidelines that encourage development affordable housing units?	2	0	0	2	4
Any potential barriers to the development of low- to moderate- income housing?	1	1	0	2	4
Guidelines that allow the development of mixed use housing?	2	0	0	2	4
Any potential barriers to the development of mixed use housing?	2	0	0	2	4
Occupancy Standards					
A definition for the term "family"?	2	0	0	2	4
Residential occupancy standards or limits?	2	0	0	2	4
Special Needs Housing					
A definition for the term "disability"?	1	1	0	2	4
Development standards for making housing accessible to persons with disabilities?	1	0	1	2	4
A process by which persons with disabilities can request modification to the jurisdiction's policies?	1	1	0	2	4
Standards for the development of senior housing?	1	0	1	2	4
Guidelines that distinguish senior citizen housing from other residential uses?	0	1	1	2	4
Guidelines for developing housing for any other special needs populations?	2	0	0	2	4
Fair Housing Policies					
A fair housing ordinance, policy, or regulation?	1	0	1	2	4
Policies or practices for "affirmatively furthering fair housing"?	2	0	0	2	4

I. IMPEDIMENTS

The *2013 Northeast Ohio Regional Analysis of Impediments to Fair Housing Choice* uncovered several potential issues regarding fair housing in the Canton-Massillon Housing Market Area. Identification of these items as probable impediments to fair housing choice was based on HUD's definition of impediments as actions, omissions, or decisions that restrict housing choice due to protected class status or actions, omissions, or decisions that

³² For areas with both nonentitlement and entitlement communities, the results of the nonentitlement community government official survey and the entitlement community interviews were summed.

have this effect. The identified impediments are supported by evidence uncovered during the Regional AI process, with impediments of higher need being those identified in multiple sources.

These probable impediments in the entirety of the Northeast Ohio Region are presented in **Volumes I and II** of the Regional AI. They are accompanied by suggested actions that jurisdictions in the Region may implement in order to alleviate or eliminate these impediments, and are accompanied by measurable objectives. The goal of these actions and measureable objectives is to assist these agencies in offering greater housing choice for all citizens of the Northeast Ohio Region.

The following list presents the private and public sector impediments found in the Canton-Massillon Housing Market Area.

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:* 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.

IMPEDIMENTS MATRIX

The matrix on the following page includes the impediment, data source, or sources that indicated its existence, protected classes most affected, and ranking of need for action. Level of need for action was determined based on the number of data sources that identified each impediment.

Table 7.I.1
Impediments Matrix
 7. Canton-Massillon Housing Market Area
 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 ³³			
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				Disabled persons	L
Public Sector													
1	Lack of sufficient fair housing policies or practices by several units of local government							X				All	L
2	Lack of sufficient fair housing outreach and education efforts							X	X	X		All	H
3	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		All	M
5	Lack of inclusionary policies							X		X		All	M

³³ 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.

8. CLEVELAND HOUSING MARKET AREA

A. CENSUS BUREAU DATA

This section contains additional data from the U.S. Census Bureau.

Table 8.A.1

Population by Age

8. Cleveland Housing Market Area
2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Under 5	141,425	6.6%	120,979	5.8%	-14.5%
5 to 19	455,720	21.2%	414,859	20.0%	-9.0%
20 to 24	116,580	5.4%	119,186	5.7%	2.2%
25 to 34	282,674	13.2%	242,552	11.7%	-14.2%
35 to 54	646,637	30.1%	592,558	28.5%	-8.4%
55 to 64	193,528	9.0%	271,394	13.1%	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%

Table 8.A.2

Elderly Population by Age

8. Cleveland Housing Market Area
2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
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%

Table 8.A.3

Population by Race and Ethnicity

8. Cleveland Housing Market Area
2000 & 2010 Census SF1 Data

Race	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
White	1,634,927	76.1%	1,538,382	74.1%	-5.9%
Black	413,797	19.3%	416,528	20.1%	.7%
American Indian	3,926	.2%	4,056	.2%	3.3%
Asian	30,350	1.4%	40,522	2.0%	33.5%
Native Hawaiian/ Pacific Islander	488	.0%	398	.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%

Table 8.A.4**Disability by Age**8. Cleveland Housing Market Area
2010 Three-Year ACS Data

Age	Male		Female		Total	
	Disabled Population	Disability Rate	Disabled Population	Disability Rate	Disabled Population	Disability Rate
Under 5	479	.8%	592	1.0%	1,071	.9%
5 to 17	14,040	7.6%	8,407	4.7%	22,447	6.2%
18 to 34	14,760	7.4%	13,929	6.7%	28,689	7.0%
35 to 64	53,351	12.9%	59,289	13.3%	112,640	13.1%
65 to 74	16,765	24.3%	20,634	24.3%	37,399	24.3%
75 or Older	25,883	46.6%	45,485	50.9%	71,368	49.3%
Total	125,278	12.7%	148,336	13.9%	273,614	13.3%

Table 8.A.5**Employment Status by Disability and Type: Age 18 to 64**8. Cleveland Housing Market Area
2010 Three-Year ACS Data

Disability Status	Population
Employed:	910,507
With a disability:	52,806
With a hearing difficulty	13,675
With a vision difficulty	8,597
With a cognitive difficulty	17,381
With an ambulatory difficulty	20,926
With a self-care difficulty	5,969
With an independent living difficulty	12,124
No disability	857,701
Unemployed:	101,515
With a disability:	14,402
With a hearing difficulty	2,262
With a vision difficulty	2,151
With a cognitive difficulty	7,194
With an ambulatory difficulty	5,770
With a self-care difficulty	1,568
With an independent living difficulty	3,911
No disability	87,113
Not in labor force:	255,679
With a disability:	74,121
With a hearing difficulty	10,232
With a vision difficulty	11,284
With a cognitive difficulty	36,304
With an ambulatory difficulty	46,244
With a self-care difficulty	18,354
With an independent living difficulty	37,156
No disability	181,558
Total	1,267,701

Table 8.A.6**Households by Income**8. Cleveland Housing Market Area
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	132,221	15.5%	122,033	14.4%
\$15,000 to \$19,999	52,357	6.1%	48,223	5.7%
\$20,000 to \$24,999	55,887	6.5%	47,821	5.7%
\$25,000 to \$34,999	108,593	12.7%	91,975	10.9%
\$35,000 to \$49,999	141,723	16.6%	123,836	14.6%
\$50,000 to \$74,999	171,989	20.2%	157,235	18.6%
\$75,000 to \$99,999	92,133	10.8%	102,030	12.1%
\$100,000 or More	98,484	11.5%	152,968	18.1%
Total	853,387	100.0%	846,121	100.0%

Table 8.A.7**Poverty by Age**8. Cleveland Housing Market Area
2000 Census SF3 & 2010 Five-Year ACS Data

Age	2000 Census		2010 Five-Year ACS	
	Persons in Poverty	% of Total	Persons in Poverty	% of Total
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%
Total	226,498	100.0%	281,442	100.0%
Poverty Rate	10.8%	.	13.8%	.

Table 8.A.8**Households by Year Home Built**8. Cleveland Housing Market Area
2000 Census SF3 & 2010 Five-Year ACS Data

Year Built	2000 Census		2010 Five-Year ACS	
	Households	% of Total	Households	% of Total
1939 or Earlier	201,118	23.6%	193,312	22.8%
1940 to 1949	95,502	11.2%	72,439	8.6%
1950 to 1959	170,875	20.0%	166,213	19.6%
1960 to 1969	130,753	15.3%	114,008	13.5%
1970 to 1979	115,922	13.6%	110,444	13.1%
1980 to 1989	60,744	7.1%	58,254	6.9%
1990 to 1999	78,251	9.2%	74,922	8.9%
2000 to 2004	.	.	39,373	4.7%
2005 or Later	.	.	17,156	2.0%
Total	853,165	100.0%	846,121	100.0%

Table 8.A.9**Housing Units by Type**8. Cleveland Housing Market Area
2000 Census SF3 & 2010 Five-Year ACS Data

Unit Type	2000 Census		2010 Five-Year ACS	
	Units	% of Total	Units	% of Total
Single-Family	630,903	69.2%	670,546	70.4%
Duplex	68,745	7.5%	70,145	7.4%
Tri- or Four-Plex	32,266	3.5%	30,576	3.2%
Apartment	168,259	18.5%	170,255	17.9%
Mobile Home	11,084	1.2%	10,888	1.1%
Boat, RV, Van, Etc.	99	.0%	190	.0%
Total	911,356	100.0%	952,600	100.0%

Table 8.A.10**Housing Units by Tenure**8. Cleveland Housing Market Area
2000 & 2010 Census SF1 Data

Tenure	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
Occupied Housing Units	853,165	93.6%	854,893	89.4%	.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%
Total Housing Units	911,356	100.0%	955,756	100.0%	4.9%

Table 8.A.11**Disposition of Vacant Housing Units**8. Cleveland Housing Market Area
2000 & 2010 Census SF1 Data

Disposition	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
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%	-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%

Table 8.A.12**Households by Household Size**8. Cleveland Housing Market Area
2000 & 2010 Census SF1 Data

Size	2000 Census		2010 Census		% Change 00-10
	Households	% of Total	Households	% of Total	
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%	.2%

Table 8.A.13

Household Type by Tenure
8. Cleveland Housing Market Area
2000 & 2010 Census SF1 Data

Household Type	2000 Census		2010 Census		% Change 00–10
	Households	% of Total	Households	% of Total	
Family Households	560,570	65.7%	536,325	62.7%	-4.3%
Married-Couple Family	409,187	73.0%	372,601	69.5%	-8.9%
Owner-Occupied	353,197	86.3%	323,611	86.9%	-8.4%
Renter-Occupied	55,990	13.7%	48,990	13.1%	-12.5%
Other Family	151,383	27.0%	163,724	30.5%	8.2%
Male Householder, No Spouse	32,748	21.6%	37,839	23.1%	15.5%
Owner-Occupied	20,205	61.7%	22,367	59.1%	10.7%
Renter-Occupied	12,543	38.3%	15,472	40.9%	23.4%
Female Householder, No Spouse	118,635	78.4%	125,885	76.9%	6.1%
Owner-Occupied	59,746	50.4%	58,948	46.8%	-1.3%
Renter-Occupied	58,889	49.6%	66,937	53.2%	13.7%
Non-Family Households	292,595	34.3%	318,568	37.3%	8.9%
Owner-Occupied	147,724	50.5%	164,938	51.8%	11.7%
Renter-Occupied	144,871	49.5%	153,630	48.2%	6.0%
Total	853,165	100.0%	854,893	100.0%	.2%

Table 8.A.14

Group Quarters Population
8. Cleveland Housing Market Area
2000 & 2010 Census SF1 Data

Group Quarters Type	2000 Census		2010 Census		% Change 00-10
	Population	% of Total	Population	% of Total	
Institutionalized					
Correctional Institutions	7,838	28.9%	8,059	31.8%	2.8%
Juvenile Facilities	.	.	1,265	5.0%	.
Nursing Homes	17,192	63.3%	15,804	62.3%	-8.1%
Other Institutions	2,135	7.9%	225	.9%	-89.5%
Total	27,165	100.0%	25,353	100.0%	-6.7%
Noninstitutionalized					
College Dormitories	8,805	51.9%	10,934	60.5%	24.2%
Military Quarters	11	.1%	24	.1%	118.2%
Other Noninstitutional	8,147	48.0%	7,120	39.4%	-12.6%
Total	16,963	38.4%	18,078	41.6%	6.6%
Total Group Quarters Population	44,128	100.0%	43,431	100.0%	-1.6%

Table 8.A.15

Overcrowding and Severe Overcrowding
8. Cleveland Housing Market Area
2000 Census SF3 & 2010 Five-Year ACS Data

2000 Census GPO & 2010 Five Year ACS Data							
Data Source	No Overcrowding		Overcrowding		Severe Overcrowding		Total
	Households	% of Total	Households	% of Total	Households	% of Total	
Owner							
2000 Census	575,561	99.1%	4,270	.7%	1,047	.2%	580,878
2010 ACS	572,560	99.4%	2,880	.5%	480	.1%	575,920
Renter							
2000 Census	263,441	96.8%	5,975	2.2%	2,871	1.1%	272,287
2010 ACS	265,263	98.2%	3,771	1.4%	1,167	.4%	270,201
Total							
2000 Census	839,002	98.3%	10,245	1.2%	3,918	.5%	853,165
2010 ACS	837,823	99.0%	6,651	.8%	1,647	.2%	846,121

Table 8.A.16
Households with Incomplete Plumbing Facilities
 8. Cleveland Housing Market Area
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Plumbing Facilities	849,780	842,039
Lacking Complete Plumbing Facilities	3,385	4,082
Total Households	853,165	846,121
Percent Lacking	.4%	.5%

Table 8.A.17
Households with Incomplete Kitchen Facilities
 8. Cleveland Housing Market Area
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Kitchen Facilities	848,363	837,873
Lacking Complete Kitchen Facilities	4,802	8,248
Total Households	853,165	846,121
Percent Lacking	.6%	1.0%

Table 8.A.18
Cost Burden and Severe Cost Burden by Tenure
 8. Cleveland Housing Market Area
 2000 Census & 2010 Five-Year ACS Data

Data Source	Less Than 30%		31%-50%		Above 50%		Not Computed		Total
	Households	% of Total	Households	% of Total	Households	% of Total	Households	% of Total	
Owner With a Mortgage									
2000 Census	263,610	73.2%	63,071	17.5%	31,754	8.8%	1,445	.4%	359,880
2010 ACS	260,382	64.7%	89,198	22.2%	51,434	12.8%	1,427	.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 ACS	140,063	80.7%	19,642	11.3%	12,252	7.1%	1,522	.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 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 ACS	523,928	61.9%	166,419	19.7%	133,839	15.8%	21,935	2.6%	846,121

Table 8.A.19
Median Housing Costs
 8. Cleveland Housing Market Area
 2000 Census SF3 & 2010 Five-Year ACS Data

Housing Cost	2000 Census	2010 ACS
Median Contract Rent	\$2,485	\$3,021
Median Home Value	\$683,600	\$858,500

B. BEA DATA

This section contains additional Bureau of Economic Analysis (BEA) data that address employment and income.

Table 8.B.1
Employment by Industry
 8. Cleveland Housing Market Area
 Select Years 2001–2010 BEA Data

NAICS Categories	2001	2005	2006	2007	2008	2009	2010	% Change 01–10
Farm employment	6,240	5,220	5,274	5,374	4,683	4,831	4,736	-24.1%
Forestry, fishing, related activities, and other	1,022	774	749	(D) ³⁴	880	176	345	-66.2%
Mining	1,159	340	375	(D)	474	262	396	-65.8%
Utilities	3,466	3,702	3,560	3,854	3,847	3,612	3,133	-9.6%
Construction	63,553	65,687	63,892	63,699	60,973	55,620	52,947	-16.7%
Manufacturing	183,307	152,776	151,391	147,148	142,786	123,026	121,558	-33.7%
Wholesale trade	60,942	58,797	60,381	56,153	54,587	50,711	49,463	-18.8%
Retail trade	137,380	129,860	129,139	128,873	126,691	121,379	118,731	-13.6%
Transportation and warehousing	33,048	33,501	33,858	38,746	37,662	33,958	33,410	1.1%
Information	26,741	22,500	22,106	21,950	21,264	19,577	18,987	-29.0%
Finance and insurance	74,747	71,723	71,460	72,508	72,283	74,129	74,539	-.3%
Real estate and rental and leasing	44,311	52,219	51,844	51,555	51,131	50,477	50,190	13.3%
Professional and technical services	82,439	82,348	84,002	86,828	86,948	81,939	80,214	-2.7%
Management of companies and enterprises	18,411	23,317	24,746	23,660	23,913	22,779	22,734	23.5%
Administrative and waste services	78,595	80,987	82,480	83,866	82,520	76,617	79,196	.8%
Educational services	29,271	35,389	36,082	36,629	37,439	39,588	40,211	37.4%
Health care and social assistance	146,089	157,456	161,609	166,205	169,053	172,713	176,105	20.5%
Arts, entertainment, and recreation	24,302	24,876	24,806	25,453	25,373	25,300	25,396	4.5%
Accommodation and food services	81,655	82,666	84,519	83,485	82,206	79,158	78,977	-3.3%
Other services, except public administration	67,347	65,734	65,880	66,440	65,781	64,364	63,223	-6.1%
Government and government enterprises	149,902	147,730	147,955	149,145	149,029	147,110	145,798	-2.7%
Total	1,318,974	1,303,194	1,312,017	1,318,238	1,305,178	1,254,584	1,247,466	-5.4%

³⁴ (D): These data are not shown to avoid disclosure of confidential information, but estimates are included in the totals.

Table 8.B.2
Real Earnings by Industry
 8. Cleveland Housing Market Area
 Select Years 2001–2010 BEA Data, Real 2011 Dollars

NAICS Categories	2001	2005	2006	2007	2008	2009	2010	% Change 00–10
Farm earnings	155,867	145,447	90,630	108,949	93,150	109,369	77,881	-50.0%
Forestry, fishing, related activities, and other	29,752	17,254	17,659	(D) ³⁵	19,016	2,797	4,975	-83.3%
Mining	281,104	22,294	20,662	(D)	15,357	3,160	3,452	-98.8%
Utilities	318,200	417,965	413,353	432,099	468,153	456,014	371,038	16.6%
Construction	3,676,059	3,601,825	3,542,426	3,217,409	3,081,457	2,754,128	2,716,750	-26.1%
Manufacturing	12,966,786	11,587,121	11,489,071	11,086,880	11,356,769	9,261,226	10,259,889	-20.9%
Wholesale trade	4,590,585	4,613,303	4,760,777	4,619,850	4,491,505	4,055,217	4,115,702	-10.3%
Retail trade	4,326,997	4,024,323	3,926,554	3,917,188	3,673,696	3,554,154	3,536,409	-18.3%
Transportation and warehousing	1,722,771	2,063,276	1,998,714	2,137,852	2,048,672	1,828,054	1,846,238	7.2%
Information	1,642,473	1,469,798	1,419,998	1,411,277	1,358,768	1,219,416	1,217,855	-25.9%
Finance and insurance	5,130,119	5,143,280	5,265,790	5,099,625	4,637,903	4,608,536	4,534,796	-11.6%
Real estate and rental and leasing	1,473,978	1,544,541	1,323,067	1,114,608	1,335,675	1,441,801	1,343,722	-8.8%
Professional and technical services	6,416,811	6,101,234	6,195,539	6,368,506	6,665,623	5,954,904	5,944,549	-7.4%
Management of companies and enterprises	1,680,322	2,295,069	2,551,133	2,480,056	2,420,109	2,168,285	2,392,493	42.4%
Administrative and waste services	2,437,155	2,629,691	2,708,540	2,845,501	2,717,685	2,435,047	2,577,732	5.8%
Educational services	1,089,234	1,265,299	1,275,889	1,249,335	1,276,487	1,316,831	1,310,059	20.3%
Health care and social assistance	7,168,164	7,974,347	8,297,794	8,141,095	8,509,719	8,763,933	9,019,713	25.8%
Arts, entertainment, and recreation	901,659	834,135	818,491	850,308	865,524	859,671	889,440	-1.4%
Accommodation and food services	1,695,318	1,708,409	1,709,830	1,731,183	1,638,271	1,570,664	1,640,872	-3.2%
Other services, except public administration	2,349,933	2,271,269	2,214,073	2,217,533	2,132,268	2,044,833	2,061,591	-12.3%
Government and government enterprises	9,074,030	9,668,023	9,525,040	9,589,380	9,640,640	9,701,102	9,708,616	7.0%
Total	69,372,466	69,868,333	70,103,061	69,153,086	69,493,322	64,526,831	66,034,437	-4.8%

³⁵ (D): These data are not shown to avoid disclosure of confidential information, but estimates are included in the totals.

Table 8.B.3
Real Earnings Per Job by Industry
 8. Cleveland Housing Market Area
 Select Years 2001–2010 BEA Data, 1,000's of Real 2011 Dollars

NAICS Categories	2001	2005	2006	2007	2008	2009	2010	% Change 00–10
Farm earnings	24,979	27,863	17,184	20,273	19,891	22,639	16,444	-34.2%
Forestry, fishing, related activities, and other	29,112	22,291	23,577	(D) ³⁶	21,609	15,890	14,420	-50.5%
Mining	242,540	65,569	55,100	(D)	32,400	12,062	8,718	-96.4%
Utilities	91,806	112,903	116,111	112,117	121,693	126,250	118,429	29.0%
Construction	57,842	54,833	55,444	50,510	50,538	49,517	51,311	-11.3%
Manufacturing	70,738	75,844	75,890	75,345	79,537	75,279	84,403	19.3%
Wholesale trade	75,327	78,462	78,846	82,273	82,282	79,967	83,208	10.5%
Retail trade	31,497	30,990	30,406	30,396	28,997	29,281	29,785	-5.4%
Transportation and warehousing	52,129	61,588	59,032	55,176	54,396	53,833	55,260	6.0%
Information	61,422	65,324	64,236	64,295	63,900	62,288	64,141	4.4%
Finance and insurance	68,633	71,710	73,689	70,332	64,163	62,169	60,838	-11.4%
Real estate and rental and leasing	33,264	29,578	25,520	21,620	26,123	28,564	26,773	-19.5%
Professional and technical services	77,837	74,091	73,755	73,346	76,662	72,675	74,109	-4.8%
Management of companies and enterprises	91,267	98,429	103,093	104,821	101,205	95,188	105,239	15.3%
Administrative and waste services	31,009	32,471	32,839	33,929	32,934	31,782	32,549	5.0%
Educational services	37,212	35,754	35,361	34,108	34,095	33,263	32,580	-12.4%
Health care and social assistance	49,067	50,645	51,345	48,982	50,338	50,743	51,218	4.4%
Arts, entertainment, and recreation	37,102	33,532	32,996	33,407	34,112	33,979	35,023	-5.6%
Accommodation and food services	20,762	20,666	20,230	20,736	19,929	19,842	20,777	.1%
Other services, except public administration	34,893	34,552	33,608	33,376	32,415	31,770	32,608	-6.5%
Government and government enterprises	60,533	65,444	64,378	64,296	64,690	65,945	66,590	10.0%
Average	52,596	53,613	53,432	52,459	53,244	51,433	52,935	.64%

³⁶ (D): These data are not shown to avoid disclosure of confidential information, but estimates are included in the totals.

Table 8.B.4
Total Employment and Real Personal Income
 8. Cleveland Housing Market Area
 1969–2010 BEA Data, 2011 Dollars

Year	1,000s of 2011 Dollars						Per Capita Income	Total Employment	Real Average Earnings Per Job
	Earnings	Social Security Contributions	Residents Adjustments	Dividends, Interest, Rents	Transfer Payments	Personal Income			
1969	44,677,674	3,025,477	-1,436,114	6,749,915	3,290,887	50,256,885	21,805	1,091,630	40,927
1970	43,223,984	2,865,730	-1,292,319	6,865,099	3,692,118	49,623,151	21,400	1,076,814	40,141
1971	42,610,255	2,899,831	-1,310,124	6,924,324	4,210,482	49,535,106	21,420	1,044,149	40,809
1972	44,293,711	3,179,466	-1,382,135	6,989,407	4,446,611	51,168,128	22,466	1,053,824	42,031
1973	46,744,422	3,887,018	-1,527,602	7,262,401	4,850,623	53,442,826	23,584	1,095,299	42,677
1974	46,713,471	4,001,056	-1,604,522	7,594,622	5,224,631	53,927,146	23,993	1,114,246	41,924
1975	44,112,059	3,674,920	-1,599,601	7,302,631	5,879,515	52,019,683	23,248	1,077,447	40,941
1976	46,198,455	3,920,397	-1,784,190	7,319,896	5,888,153	53,701,917	24,191	1,088,064	42,459
1977	49,053,342	4,136,403	-2,034,563	7,580,215	5,815,153	56,277,743	25,423	1,114,106	44,029
1978	51,102,671	4,451,800	-2,234,051	8,006,928	5,864,858	58,288,606	26,412	1,148,501	44,495
1979	51,369,251	4,663,315	-2,362,013	8,450,449	6,123,785	58,918,157	26,970	1,159,618	44,298
1980	48,755,071	4,394,183	-2,316,446	9,341,939	7,164,740	58,551,121	26,952	1,133,734	43,004
1981	47,558,800	4,582,569	-2,307,587	10,534,399	7,191,980	58,395,023	27,008	1,112,891	42,734
1982	45,184,794	4,413,978	-2,165,868	11,135,233	7,873,722	57,613,903	26,789	1,072,341	42,137
1983	45,242,371	4,510,931	-2,138,986	11,534,370	8,151,012	58,277,836	27,150	1,058,826	42,729
1984	47,894,203	4,903,022	-2,255,737	12,615,279	8,177,479	61,528,201	28,734	1,090,297	43,928
1985	49,384,216	5,140,296	-2,315,643	12,940,664	8,417,487	63,286,427	29,695	1,106,952	44,613
1986	50,152,268	5,399,310	-2,302,322	12,936,684	8,757,242	64,144,562	30,248	1,123,074	44,656
1987	51,526,363	5,554,656	-2,346,343	12,856,364	8,820,292	65,302,020	30,892	1,145,205	44,993
1988	54,260,211	5,970,224	-2,433,922	13,178,119	8,904,053	67,938,237	32,320	1,171,445	46,319
1989	54,926,143	6,124,811	-2,511,577	13,908,095	9,147,962	69,345,811	32,964	1,194,435	45,985
1990	55,794,796	6,355,752	-2,591,093	14,835,661	9,697,091	71,380,702	33,922	1,206,598	46,241
1991	54,649,047	6,342,554	-2,529,186	14,233,058	10,062,831	70,073,195	33,092	1,192,489	45,828
1992	56,175,603	6,491,275	-2,620,466	13,606,068	10,674,626	71,344,556	33,479	1,181,133	47,561
1993	56,961,561	6,639,277	-2,621,117	13,813,878	10,914,275	72,429,321	33,839	1,195,585	47,643
1994	59,335,859	6,998,987	-2,768,045	14,008,155	11,035,971	74,612,954	34,763	1,223,705	48,489
1995	60,638,849	7,200,195	-2,898,689	14,475,813	11,409,763	76,425,541	35,543	1,251,048	48,470
1996	61,253,072	7,222,283	-3,010,844	15,238,811	11,530,772	77,789,529	36,121	1,268,542	48,286
1997	63,392,608	7,335,664	-3,295,289	15,980,251	11,673,781	80,415,686	37,356	1,290,060	49,139
1998	66,438,956	7,448,577	-3,576,807	17,259,035	11,669,424	84,342,030	39,200	1,308,642	50,769
1999	68,972,819	7,653,374	-3,971,351	16,607,402	11,826,160	85,781,656	39,900	1,325,778	52,024
2000	70,998,106	7,587,735	-4,199,754	16,830,850	12,252,007	88,293,473	41,114	1,340,411	52,967
2001	69,372,466	7,439,065	-3,993,708	15,798,683	12,909,166	86,647,542	40,456	1,318,974	52,596
2002	68,600,205	7,159,685	-3,817,342	15,075,712	13,458,812	86,157,702	40,332	1,292,744	53,066
2003	69,876,272	7,321,555	-3,864,145	13,453,611	13,757,125	85,901,309	40,307	1,292,129	54,078
2004	70,960,466	7,541,551	-3,914,794	13,374,060	13,901,041	86,779,223	40,877	1,299,535	54,605
2005	69,868,333	7,457,146	-3,820,019	13,609,189	14,079,037	86,279,394	40,858	1,303,194	53,613
2006	70,103,061	7,558,058	-3,803,571	14,905,333	14,318,136	87,964,901	41,900	1,312,017	53,432
2007	69,153,086	7,494,364	-3,715,768	15,560,452	14,745,118	88,248,524	42,192	1,318,238	52,459
2008	69,493,322	7,628,956	-3,505,161	16,033,472	15,440,178	89,832,855	43,083	1,305,178	53,244
2009	64,526,831	7,305,685	-3,276,768	12,889,442	17,094,983	83,928,804	40,330	1,254,584	51,433
2010	66,034,437	7,385,514	-3,363,064	12,993,441	17,592,860	85,872,160	41,373	1,247,466	52,935

C. BLS DATA

This section contains Bureau of Labor Statistics (BLS) data that address employment and income.

Table 8.C.1
Labor Force Statistics
 8. Cleveland Housing Market Area
 1990–2011 BLS Data

Year	Labor Force	Employment	Unemployment	Unemployment Rate	Statewide Unemployment Rate
1990	1,038,126	977,409	60,717	5.8%	5.7%
1991	1,021,995	950,993	71,002	6.9%	6.6%
1992	1,036,234	953,833	82,401	8.0%	7.4%
1993	1,047,133	970,976	76,157	7.3%	6.7%
1994	1,061,358	991,448	69,910	6.6%	5.6%
1995	1,064,553	1,006,811	57,742	5.4%	4.9%
1996	1,071,683	1,019,970	51,713	4.8%	5.0%
1997	1,087,941	1,038,381	49,560	4.6%	4.6%
1998	1,099,727	1,054,165	45,562	4.1%	4.3%
1999	1,113,103	1,066,600	46,503	4.2%	4.3%
2000	1,105,888	1,062,855	43,033	3.9%	4.0%
2001	1,108,246	1,059,727	48,519	4.4%	4.4%
2002	1,105,536	1,045,636	59,900	5.4%	5.7%
2003	1,105,555	1,039,412	66,143	6.0%	6.2%
2004	1,096,866	1,031,672	65,194	5.9%	6.1%
2005	1,091,575	1,029,126	62,449	5.7%	5.9%
2006	1,093,710	1,033,395	60,315	5.5%	5.4%
2007	1,101,169	1,034,424	66,745	6.1%	5.6%
2008	1,100,367	1,026,186	74,181	6.7%	6.5%
2009	1,084,374	988,723	95,651	8.8%	10.1%
2010	1,080,862	986,439	94,423	8.7%	10.0%
2011	1,082,818	999,486	83,332	7.7%	8.6%

D. HMDA DATA

The Home Mortgage Disclosure Act (HMDA) requires both depository and non-depository lenders to collect and publicly disclose information about housing-related loans and loan applications.³⁷ The information presented in this section presents detailed HMDA data, including denial rates and predatory lending including high annual percentage rate (APR) loans.

Table 8.D.1

Purpose of Loan by Year
8. Cleveland Housing Market Area
2004–2011 HMDA Data

Purpose	2004	2005	2006	2007	2008	2009	2010	2011	Total
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
Total	209,937	218,184	189,957	135,871	93,036	103,476	92,759	83,960	1,127,180

Table 8.D.2

Occupancy Status for Home Purchase Loan Applications
8. Cleveland Housing Market Area
2004–2011 HMDA Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	Total
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
Total	69,464	79,904	76,175	50,408	33,884	31,515	27,385	24,821	393,556

Table 8.D.3

Owner-Occupied Home Purchase Loan Applications by Loan Type
8. Cleveland Housing Market Area
2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Conventional	53,577	62,120	58,762	37,902	16,870	12,280	10,748	10,631	262,890
FHA - Insured	6,802	6,018	4,763	4,935	12,917	16,203	14,025	11,245	76,908
VA - Guaranteed	847	867	741	712	1,084	1,246	1,093	1,233	7,823
Rural Housing Service or Farm Service Agency	20	28	20	53	109	346	258	312	1,146
Total	61,246	69,033	64,286	43,602	30,980	30,075	26,124	23,421	348,767

³⁷ Data are considered “raw” because they contain entry errors and incomplete loan applications. Starting in 2004, the HMDA data made substantive changes in reporting. It modified the way it handled Hispanic data, loan interest rates, and the reporting of multifamily loan applications.

DENIAL RATES

Table 8.D.4
Loan Applications by Action Taken
 8. Cleveland Housing Market Area
 2004–2011 HMDA Data

Action	2004	2005	2006	2007	2008	2009	2010	2011	Total
Loan Originated	35,244	38,039	32,622	22,799	16,676	15,055	13,424	11,843	185,702
Application Approved but not Accepted	4,151	4,125	3,894	2,383	1,177	741	716	620	17,807
Application Denied	5,735	7,902	8,547	5,455	3,080	2,002	1,919	1,805	36,445
Application Withdrawn by Applicant	3,888	4,710	4,254	1,985	1,630	1,381	1,282	1,235	20,365
File Closed for Incompleteness	1,035	1,112	971	768	397	294	343	226	5,146
Loan Purchased by the Institution	11,193	13,044	13,959	10,158	7,992	10,596	8,439	7,692	83,073
Preapproval Request Denied	0	101	39	54	28	6	1	0	229
Preapproval Approved but not Accepted	0	0	0	0	0	0	0	0	0
Total	61,246	69,033	64,286	43,602	30,980	30,075	26,124	23,421	348,767
Denial Rate	14.0%	17.2%	20.8%	19.3%	15.6%	11.7%	12.5%	13.2%	16.4%

Table 8.D.5
Denial Rates by Gender of Applicant
 8. Cleveland Housing Market Area
 2004–2011 HMDA Data

Year	Male	Female	Not Available	Not Applicable	Average
2004	11.9%	15.6%	42.4%	13.3%	14.0%
2005	14.8%	19.7%	37.1%	16.7%	17.2%
2006	17.7%	24.9%	33.6%	11.1%	20.8%
2007	16.4%	23.2%	32.0%	40.0%	19.3%
2008	14.4%	16.9%	23.9%	33.3%	15.6%
2009	10.7%	12.5%	21.9%	.0%	11.7%
2010	11.1%	14.4%	18.0%	.0%	12.5%
2011	12.0%	14.5%	21.4%	.0%	13.2%
Average	14.2%	19.0%	31.2%	19.4%	16.4%

Table 8.D.6
Loan Applications by Selected Action Taken by Gender of Applicant
 8. Cleveland Housing Market Area
 2004–2011 HMDA Data

Gender		2004	2005	2006	2007	2008	2009	2010	2011	Total
Male	Originated	23,302	24,675	20,840	14,868	10,605	9,619	8,570	7,636	120,115
	Denied	3,139	4,284	4,468	2,924	1,779	1,157	1,073	1,037	19,861
	Denial Rate	11.9%	14.8%	17.7%	16.4%	14.4%	10.7%	11.1%	12.0%	14.2%
Female	Originated	11,234	12,386	10,731	7,162	5,500	4,946	4,265	3,679	59,903
	Denied	2,083	3,046	3,551	2,168	1,120	709	717	625	14,019
	Denial Rate	15.6%	19.7%	24.9%	23.2%	16.9%	12.5%	14.4%	14.5%	19.0%
Not Available	Originated	695	963	1,043	763	563	486	587	526	5,626
	Denied	511	569	527	359	177	136	129	143	2,551
	Denial Rate	42.4%	37.1%	33.6%	32.0%	23.9%	21.9%	18.0%	21.4%	31.2%
Not Applicable	Originated	13	15	8	6	8	4	2	2	58
	Denied	2	3	1	4	4	0	0	0	14
	Denial Rate	13.3%	16.7%	11.1%	40.0%	33.3%	.0%	.0%	.0%	19.4%
Total	Originated	35,244	38,039	32,622	22,799	16,676	15,055	13,424	11,843	185,702
	Denied	5,735	7,902	8,547	5,455	3,080	2,002	1,919	1,805	36,445
	Denial Rate	14.0%	17.2%	20.8%	19.3%	15.6%	11.7%	12.5%	13.2%	16.4%

Table 8.D.7
Denial Rates by Race/Ethnicity of Applicant
 8. Cleveland Housing Market Area
 2004–2011 HMDA Data

Race/Ethnicity	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	21.4%	31.9%	24.3%	26.5%	22.8%	12.2%	20.0%	31.4%	24.7%
Asian	8.7%	9.5%	14.5%	13.3%	13.6%	15.3%	11.8%	15.7%	12.2%
Black	25.2%	33.7%	43.2%	43.8%	32.9%	23.6%	23.8%	27.0%	34.8%
White	10.3%	12.2%	13.1%	12.9%	12.0%	9.6%	10.6%	11.0%	11.7%
Not Available	33.4%	31.4%	36.1%	32.1%	24.8%	19.8%	19.1%	20.7%	29.9%
Not Applicable	12.5%	16.7%	9.1%	50.0%	11.1%	0.0%	0.0%	.0%	13.8%
Average	14.0%	17.2%	20.8%	19.3%	15.6%	11.7%	12.5%	13.2%	16.4%
Non-Hispanic	12.4%	15.6%	19.2%	17.9%	14.8%	11.0%	11.7%	12.5%	15.1%
Hispanic	18.0%	22.1%	23.2%	26.1%	20.0%	14.6%	19.6%	14.8%	20.8%

Table 8.D.8
Loan Applications by Selected Action Taken by Race/Ethnicity of Applicant
 8. Cleveland Housing Market Area
 2004–2011 HMDA Data

Race		2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Originated	103	94	87	50	44	43	28	24	473
	Denied	28	44	28	18	13	6	7	11	155
	Denial Rate	21.4%	31.9%	24.3%	26.5%	22.8%	20.0%	20.0%	31.4%	24.7%
Asian	Originated	717	784	630	507	362	349	321	269	3,939
	Denied	68	82	107	78	57	63	43	50	548
	Denial Rate	8.7%	9.5%	14.5%	13.3%	13.6%	15.3%	11.8%	15.7%	12.2%
Black	Originated	4,084	4,870	4,547	2,548	1,683	1,259	1,059	796	20,846
	Denied	1,374	2,475	3,460	1,985	826	389	330	294	11,133
	Denial Rate	25.2%	33.7%	43.2%	43.8%	32.9%	23.6%	23.8%	27.0%	34.8%
White	Originated	28,231	29,678	25,322	18,303	13,606	12,548	11,092	9,885	148,665
	Denied	3,242	4,109	3,804	2,715	1,862	1,334	1,321	1,224	19,611
	Denial Rate	10.3%	12.2%	13.1%	12.9%	12.0%	9.6%	10.6%	11.0%	11.7%
Not Available	Originated	2,018	2,598	2,026	1,387	973	852	922	866	11,642
	Denied	1,010	1,189	1,147	655	321	210	218	226	4,976
	Denial Rate	33.4%	31.4%	36.1%	32.1%	24.8%	19.8%	19.1%	20.7%	29.9%
Not Applicable	Originated	91	15	10	4	8	4	2	3	137
	Denied	13	3	1	4	1	0	0	0	22
	Denial Rate	33.4%	31.4%	36.1%	32.1%	24.8%	19.8%	19.1%	20.7%	13.8%
Total	Originated	35,244	38,039	32,622	22,799	16,676	15,055	13,424	11,843	185,702
	Denied	5,735	7,902	8,547	5,455	3,080	2,002	1,919	1,805	36,445
	Denial Rate	14.0%	17.2%	20.8%	19.3%	15.6%	11.7%	12.5%	13.2%	16.4%
Non-Hispanic	Originated	28,930	34,074	29,658	20,779	15,251	13,803	12,217	10,716	165,428
	Denied	4,103	6,306	7,067	4,538	2,639	1,709	1,622	1,530	29,514
	Denial Rate	12.4%	15.6%	19.2%	17.9%	14.8%	11.0%	11.7%	12.5%	15.1%
Hispanic	Originated	927	988	956	647	436	411	329	334	5,028
	Denied	203	281	289	229	109	70	80	58	1,319
	Denial Rate	18.0%	22.1%	23.2%	26.1%	20.0%	14.6%	19.6%	14.8%	20.8%

Table 8.D.9
Loan Applications by Reason for Denial
 8. Cleveland Housing Market Area
 2004–2011 HMDA Data

Denial Reason	2004	2005	2006	2007	2008	2009	2010	2011	Total
Debt-to-Income Ratio	772	931	922	913	587	441	467	402	5,435
Employment History	69	87	127	79	65	47	55	57	586
Credit History	1,209	1,405	1,501	1,237	656	468	461	401	7,338
Collateral	451	639	712	569	562	418	360	324	4,035
Insufficient Cash	116	127	155	113	69	51	61	46	738
Unverifiable Information	158	255	374	303	157	69	70	59	1,445
Credit Application Incomplete	547	632	525	562	214	119	141	202	2,942
Mortgage Insurance Denied	0	5	5	5	17	13	13	7	65
Other	1,111	2,075	1,570	750	306	172	161	132	6,277
Missing	1,302	1,746	2,656	924	447	204	130	175	7,584
Total	5,735	7,902	8,547	5,455	3,080	2,002	1,919	1,805	36,445

Table 8.D.10
Denial Rates by Income of Applicant
 8. Cleveland Housing Market Area
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	48.0%	57.9%	50.3%	55.4%	56.7%	51.8%	49.3%	56.4%	53.0%
\$15,001–\$30,000	23.5%	30.6%	36.8%	34.4%	27.0%	18.8%	21.6%	21.9%	28.2%
\$30,001–\$45,000	16.6%	19.7%	25.4%	24.3%	18.3%	12.0%	14.9%	15.5%	19.4%
\$45,001–\$60,000	13.6%	17.1%	22.1%	19.1%	15.9%	11.2%	10.8%	12.4%	16.4%
\$60,001–\$75,000	10.3%	13.3%	17.2%	16.1%	12.6%	10.4%	10.9%	11.2%	13.3%
Above \$75,000	7.8%	10.2%	12.5%	11.4%	9.8%	7.9%	7.5%	8.9%	9.9%
Data Missing	19.2%	21.8%	16.1%	24.9%	19.8%	20.7%	34.6%	25.5%	20.2%
Total	14.0%	17.2%	20.8%	19.3%	15.6%	11.7%	12.5%	13.2%	16.4%

Table 8.D.11
Denial Rates of Loans by Race/Ethnicity and Income of Applicant
 8. Cleveland Housing Market Area
 2004–2011 HMDA Data

Race	<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	Above \$75K	Data Missing	Average
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%	15.0%	16.7%	28.6%	15.4%	1.6%	37.5%	13.8%
Average	53.0%	28.2%	19.4%	16.4%	13.3%	9.9%	20.2%	16.4%
Non-Hispanic Ethnicity	52.5%	26.5%	18.0%	15.2%	12.3%	9.3%	16.1%	15.1%
Hispanic (Ethnicity)	46.2%	27.1%	22.1%	17.7%	18.7%	11.6%	23.6%	20.8%

Table 8.D.12
Loan Applications by Reason for Denial by Race/Ethnicity of Applicant
 8. Cleveland Housing Market Area
 2004–2011 HMDA Data

Denial Reason	American Indian	Asian	Black	White	Not Available	Not Applicable	Total	Hispanic (Ethnicity)
Debt-to-Income Ratio	20	105	1,514	3,218	576	2	5,435	209
Employment History	2	22	123	391	48	0	586	30
Credit History	46	101	2,369	3,990	830	2	7,338	294
Collateral	18	69	977	2,545	422	4	4,035	148
Insufficient Cash	4	10	177	465	82	0	738	32
Unverifiable Information	7	32	460	788	153	5	1,445	46
Credit Application Incomplete	7	54	683	1,774	422	2	2,942	84
Mortgage Insurance Denied	1	3	11	46	4	0	65	4
Other	24	92	2,168	3,091	900	2	6,277	229
Missing	26	60	2,651	3,303	1,539	5	7,584	243
Total	155	548	11,133	19,611	4,976	22	36,445	1,319
% Missing	16.8%	10.9%	23.8%	16.8%	30.9%	22.7%	20.8%	18.4%

Table 8.D.13
Loan Applications by Income of Applicant: Originated and Denied
 8. Cleveland Housing Market Area
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Loan Originated	131	120	142	79	58	80	70	48	728
	Application Denied	121	165	144	98	76	86	68	62	820
	Denial Rate	48.0%	57.9%	50.3%	55.4%	56.7%	51.8%	49.3%	56.4%	53.0%
\$15,001–\$30,000	Loan Originated	3,736	3,585	2,678	2,063	1,569	1,702	1,469	1,230	18,032
	Application Denied	1,150	1,584	1,558	1,080	581	394	405	345	7,097
	Denial Rate	23.5%	30.6%	36.8%	34.4%	27.0%	18.8%	21.6%	21.9%	28.2%
\$30,001–\$45,000	Loan Originated	8,146	8,766	6,851	4,601	3,703	3,565	2,753	2,359	40,744
	Application Denied	1,619	2,151	2,335	1,479	832	487	482	434	9,819
	Denial Rate	16.6%	19.7%	25.4%	24.3%	18.3%	12.0%	14.9%	15.5%	19.4%
\$45,001–\$60,000	Loan Originated	6,925	7,517	6,294	4,294	3,300	3,003	2,471	2,091	35,895
	Application Denied	1,091	1,549	1,784	1,013	623	380	300	296	7,036
	Denial Rate	13.6%	17.1%	22.1%	19.1%	15.9%	11.2%	10.8%	12.4%	16.4%
\$60,001–\$75,000	Loan Originated	4,757	5,234	4,340	2,956	2,153	1,876	1,649	1,439	24,404
	Application Denied	545	804	901	568	309	217	202	182	3,728
	Denial Rate	10.3%	13.3%	17.2%	16.1%	12.6%	10.4%	10.9%	11.2%	13.3%
Above \$75,000	Loan Originated	10,027	11,605	10,967	8,380	5,735	4,683	4,889	4,553	60,839
	Application Denied	848	1,311	1,566	1,076	620	400	397	444	6,662
	Denial Rate	7.8%	10.2%	12.5%	11.4%	9.8%	7.9%	7.5%	8.9%	9.9%
Data Missing	Loan Originated	1,522	1,212	1,350	426	158	146	123	123	5,060
	Application Denied	361	338	259	141	39	38	65	42	1,283
	Denial Rate	19.2%	21.8%	16.1%	24.9%	19.8%	20.7%	34.6%	25.5%	20.2%
Total	Loan Originated	35,244	38,039	32,622	22,799	16,676	15,055	13,424	11,843	185,702
	Application Denied	5,735	7,902	8,547	5,455	3,080	2,002	1,919	1,805	36,445
	Denial Rate	14.0%	17.2%	20.8%	19.3%	15.6%	11.7%	12.5%	13.2%	16.4%

Table 8.D.14
Loan Applications by Income and Race/Ethnicity of Applicant: Originated and Denied
 8. Cleveland Housing Market Area
 2004–2011 HMDA Data

Race		<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	> \$75K	Data Missing	Total
American Indian	Loan Originated	4	57	96	96	62	145	13	473
	Application Denied	1	43	30	25	17	34	5	155
	Denial Rate	20.0%	43.0%	23.8%	20.7%	21.5%	19.0%	27.8%	24.7%
Asian	Loan Originated	14	256	604	615	468	1,866	116	3,939
	Application Denied	17	82	92	95	67	178	17	548
	Denial Rate	54.8%	24.3%	13.2%	13.4%	12.5%	8.7%	12.8%	12.2%
Black	Loan Originated	94	3,855	6,925	4,503	2,227	2,906	336	20,846
	Application Denied	223	2,654	3,547	2,189	928	1,360	232	11,133
	Denial Rate	70.3%	40.8%	33.9%	32.7%	29.4%	31.9%	40.8%	34.8%
White	Loan Originated	520	12,716	30,707	28,635	20,253	51,601	4,233	148,665
	Application Denied	467	3,343	4,857	3,847	2,249	4,222	626	19,611
	Denial Rate	47.3%	20.8%	13.7%	11.8%	10.0%	7.6%	12.9%	11.7%
Not Available	Loan Originated	95	1,131	2,392	2,031	1,383	4,258	352	11,642
	Application Denied	112	972	1,289	874	465	867	397	4,976
	Denial Rate	54.1%	46.2%	35.0%	30.1%	25.2%	16.9%	53.0%	29.9%
Not Applicable	Loan Originated	1	17	20	15	11	63	10	137
	Application Denied	0	3	4	6	2	1	6	22
	Denial Rate	.0%	15.0%	16.7%	28.6%	15.4%	1.6%	37.5%	13.8%
Total	Loan Originated	728	18,032	40,744	35,895	24,404	60,839	5,060	185,702
	Application Denied	820	7,097	9,819	7,036	3,728	6,662	1,283	36,445
	Denial Rate	53.0%	28.2%	19.4%	16.4%	13.3%	9.9%	20.2%	16.4%
Non-Hispanic Ethnicity	Loan Originated	582	15,594	36,326	32,233	21,997	54,323	4,373	165,428
	Application Denied	642	5,631	7,959	5,799	3,083	5,563	837	29,514
	Denial Rate	52.5%	26.5%	18.0%	15.2%	12.3%	9.3%	16.1%	15.1%
Hispanic (Ethnicity)	Loan Originated	64	1,063	1,363	920	488	994	136	5,028
	Application Denied	55	395	386	198	112	131	42	1,319
	Denial Rate	46.2%	27.1%	22.1%	17.7%	18.7%	11.6%	23.6%	20.8%

PREDATORY LENDING

Table 8.D.15
Originated Owner-Occupied Loans by HAL Status
 8. Cleveland Housing Market Area
 2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Other	30,866	28,810	24,698	19,944	15,197	14,214	13,334	11,796	158,859
HAL	4,378	9,229	7,924	2,855	1,479	841	90	47	26,843
Total	35,244	38,039	32,622	22,799	16,676	15,055	13,424	11,843	185,702
Percent HAL	12.4%	24.3%	24.3%	12.5%	8.9%	5.6%	.7%	.4%	14.5%

Table 8.D.16
Loans by Loan Purpose by HAL Status
 8. Cleveland Housing Market Area
 2004–2011 HMDA Data

Loan Purpose		2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	Other	30,866	28,810	24,698	19,944	15,197	14,214	13,334	11,796	158,859
	HAL	4,378	9,229	7,924	2,855	1,479	841	90	47	26,843
	Percent HAL	12.4%	24.3%	24.3%	12.5%	8.9%	5.6%	.7%	.4%	14.5%
Home Improvement	Other	4,398	4,917	5,185	4,633	3,281	1,734	1,532	1,725	27,405
	HAL	968	1,161	1,222	872	456	266	129	74	5,148
	Percent HAL	18.0%	19.1%	19.1%	15.8%	12.2%	13.3%	7.8%	4.1%	15.8%
Refinancing	Other	36,943	27,797	20,377	16,291	13,496	27,608	28,319	24,382	195,213
	HAL	7,122	10,959	9,249	4,212	1,727	1,212	171	138	34,790
	Percent HAL	16.2%	28.3%	31.2%	20.5%	11.3%	4.2%	.6%	.6%	15.1%
Total	Other	72,207	61,524	50,260	40,868	31,974	43,556	43,185	37,903	381,477
	HAL	12,468	21,349	18,395	7,939	1,479	841	90	47	66,781
	Percent HAL	14.7%	25.8%	26.8%	16.3%	10.3%	5.1%	.9%	.7%	14.9%

Table 8.D.17
HALs Originated by Race of Borrower
 8. Cleveland Housing Market Area
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	12	27	28	7	6	1	0	0	81
Asian	40	77	76	28	13	8	1	0	243
Black	1,290	2,699	2,770	910	282	117	10	3	8,081
White	2,434	5,022	4,276	1,687	1,098	681	76	42	15,316
Not Available	591	1,404	774	223	80	34	3	2	3,111
Not Applicable	11	0	0	0	0	0	0	0	11
Total	4,378	9,229	7,924	2,855	1,479	841	90	47	26,843
Hispanic (Ethnicity)	136	276	315	129	68	37	2	3	966

Table 8.D.18
Rate of HALs Originated by Race/Ethnicity of Borrower
 8. Cleveland Housing Market Area
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	11.7%	28.7%	32.2%	14.0%	13.6%	2.3%	.0%	.0%	17.1%
Asian	5.6%	9.8%	12.1%	5.5%	3.6%	2.3%	.3%	.0%	6.2%
Black	31.6%	55.4%	60.9%	35.7%	16.8%	9.3%	.9%	.4%	38.8%
White	8.6%	16.9%	16.9%	9.2%	8.1%	5.4%	.7%	.4%	10.3%
Not Available	29.3%	54.0%	38.2%	16.1%	8.2%	4.0%	.3%	.2%	26.7%
Not Applicable	12.1%	.0%	.0%	.0%	.0%	.0%	.0%	.0%	8%
Average	12.4%	24.3%	24.3%	12.5%	8.9%	5.6%	0.7%	0.4%	14.5%
Non-Hispanic Ethnicity	11.5%	21.5%	23.2%	12.1%	8.7%	5.6%	.7%	.4%	13.5%
Hispanic (Ethnicity)	14.7%	27.9%	32.9%	19.9%	15.6%	9.0%	.6%	.9%	19.2%

Table 8.D.19
Loans by HAL Status by Race/Ethnicity of Borrower
 8. Cleveland Housing Market Area
 2004–2011 HMDA Data

Race	Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Other	91	67	59	43	38	42	28	24	392
	HAL	12	27	28	7	6	1	0	0	81
	Percent HAL	11.7%	28.7%	32.2%	14.0%	13.6%	2.3%	.0%	.0%	17.1%
Asian	Other	677	707	554	479	349	341	320	269	3,696
	HAL	40	77	76	28	13	8	1	0	243
	Percent HAL	5.6%	9.8%	12.1%	5.5%	3.6%	2.3%	.3%	.0%	6.2%
Black	Other	2,794	2,171	1,777	1,638	1,401	1,142	1,049	793	12,765
	HAL	1,290	2,699	2,770	910	282	117	10	3	8,081
	Percent HAL	31.6%	55.4%	60.9%	35.7%	16.8%	9.3%	.9%	.4%	38.8%
White	Other	25,797	24,656	21,046	16,616	12,508	11,867	11,016	9,843	133,349
	HAL	2,434	5,022	4,276	1,687	1,098	681	76	42	15,316
	Percent HAL	8.6%	16.9%	16.9%	9.2%	8.1%	5.4%	0.7%	0.4%	10.3%
Not Available	Other	1,427	1,194	1,252	1,164	893	818	919	864	8,531
	HAL	591	1,404	774	223	80	34	3	2	3,111
	Percent HAL	29.3%	54.0%	38.2%	16.1%	8.2%	4.0%	.3%	.2%	26.7%
Not Applicable	Other	80	15	10	4	8	4	2	2	126
	HAL	11	0	0	0	0	0	0	0	11
	Percent HAL	12.1%	.0%	.0%	.0%	.0%	.0%	.0%	.0%	8.0%
Total	Other	30,866	28,810	24,698	19,944	15,197	14,214	13,334	11,796	158,859
	HAL	4,378	9,229	7,924	2,855	1,479	841	90	47	26,843
	Percent HAL	12.4%	24.3%	24.3%	12.5%	8.9%	5.6%	.7%	.4%	14.5%
Non-Hispanic Ethnicity	Other	25,613	26,732	22,791	18,257	13,929	13,034	12,133	10,677	143,166
	HAL	3,317	7,342	6,867	2,522	1,322	769	84	39	22,262
	Percent HAL	11.5%	21.5%	23.2%	12.1%	8.7%	5.6%	.7%	.4%	13.5%
Hispanic (Ethnicity)	Other	791	712	641	518	368	374	327	331	4,062
	HAL	136	276	315	129	68	37	2	3	966
	Percent HAL	14.7%	27.9%	32.9%	19.9%	15.6%	9.0%	.6%	.9%	19.2%

Table 8.D.20
Rates of HALs by Income of Borrower
 8. Cleveland Housing Market Area
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Average
\$15,000 or Below	11.5%	15.8%	16.9%	12.7%	24.1%	10.0%	.0%	2.1%	12.5%
\$15,001–\$30,000	21.0%	35.5%	34.4%	21.7%	15.6%	7.9%	1.4%	1.0%	21.3%
\$30,001–\$45,000	17.7%	32.6%	33.0%	17.5%	11.9%	7.9%	.9%	.5%	19.9%
\$45,001–\$60,000	14.9%	29.7%	28.7%	14.2%	10.1%	5.8%	.5%	.3%	17.3%
\$60,001–\$75,000	10.0%	20.9%	24.2%	11.3%	8.0%	5.2%	.5%	.2%	13.3%
Above \$75,000	5.4%	13.0%	13.2%	6.6%	4.6%	3.1%	0.5%	.3%	7.4%
Data Missing	5.8%	20.7%	31.1%	22.8%	5.7%	2.1%	.0%	.0%	17.2%
Average	12.4%	24.3%	24.3%	12.5%	8.9%	5.6%	.7%	.4%	14.5%

Table 8.D.21
Loans by HAL Status by Income of Borrower
 8. Cleveland Housing Market Area
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Other	116	101	118	69	44	72	70	47	637
	HAL	15	19	24	10	14	8	0	1	91
	Percent HAL	11.5%	15.8%	16.9%	12.7%	24.1%	10.0%	.0%	2.1%	12.5%
\$15,001–\$30,000	Other	2,951	2,314	1,756	1,616	1,324	1,568	1,449	1,218	14,196
	HAL	785	1,271	922	447	245	134	20	12	3,836
	Percent HAL	21.0%	35.5%	34.4%	21.7%	15.6%	7.9%	1.4%	1.0%	21.3%
\$30,001–\$45,000	Other	6,701	5,910	4,592	3,794	3,263	3,285	2,727	2,348	32,620
	HAL	1,445	2,856	2,259	807	440	280	26	11	8,124
	Percent HAL	17.7%	32.6%	33.0%	17.5%	11.9%	7.9%	.9%	.5%	19.9%
\$45,001–\$60,000	Other	5,896	5,284	4,487	3,683	2,967	2,829	2,458	2,084	29,688
	HAL	1,029	2,233	1,807	611	333	174	13	7	6,207
	Percent HAL	14.9%	29.7%	28.7%	14.2%	10.1%	5.8%	.5%	.3%	17.3%
\$60,001–\$75,000	Other	4,280	4,140	3,291	2,623	1,980	1,779	1,641	1,436	21,170
	HAL	477	1,094	1,049	333	173	97	8	3	3,234
	Percent HAL	10.0%	20.9%	24.2%	11.3%	8.0%	5.2%	.5%	.2%	13.3%
Above \$75,000	Other	9,489	10,100	9,524	7,830	5,470	4,538	4,866	4,540	56,357
	HAL	538	1,505	1,443	550	265	145	23	13	4,482
	Percent HAL	5.4%	13.0%	13.2%	6.6%	4.6%	3.1%	.5%	.3%	7.4%
Data Missing	Other	1,433	961	930	329	149	143	123	123	4,191
	HAL	89	251	420	97	9	3	0	0	869
	Percent HAL	5.8%	20.7%	31.1%	22.8%	5.7%	2.1%	.0%	.0%	17.2%
Total	Other	30,866	28,810	24,698	19,944	15,197	14,214	13,334	11,796	158,859
	HAL	4,378	9,229	7,924	2,855	1,479	841	90	47	26,843
	Percent HAL	12.4%	24.3%	24.3%	12.5%	8.9%	5.6%	.7%	.4%	14.5%

E. CRA DATA

Additional data tables related to Community Reinvestment Act (CRA) data are presented in this section.

Table 8.E.1
Small Business Loans Originated: \$100,000 or Less by Tract MFI
 8. Cleveland Housing Market Area
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	2,019	2,657	13,697	12,460	610	31,443
2001	2,328	3,133	15,654	13,285	788	35,188
2002	2,550	3,671	19,204	16,010	836	42,271
2003	2,509	5,633	18,140	17,853	350	44,485
2004	2,485	5,336	18,376	17,598	321	44,116
2005	2,342	5,516	19,447	19,235	251	46,791
2006	3,298	7,535	27,050	29,334	467	67,684
2007	3,489	8,114	29,418	32,649	406	74,076
2008	2,621	5,938	21,866	25,345	315	56,085
2009	1,090	2,642	9,228	11,389	150	24,499
2010	984	2,370	8,379	10,275	146	22,154
2011	1,318	2,826	10,463	12,526	209	27,342
Total	27,033	55,371	210,922	217,959	4,849	516,134
Loan Amount (\$1,000s)						
2000	29,764	35,109	181,378	155,291	10,114	411,656
2001	28,929	32,485	187,414	160,793	10,228	419,849
2002	30,840	39,917	214,570	191,960	13,522	490,809
2003	26,510	59,340	194,031	195,003	5,062	479,946
2004	26,529	58,983	191,134	198,976	4,392	480,014
2005	28,768	66,360	225,005	231,826	4,551	556,510
2006	31,175	76,178	277,403	306,767	4,909	696,432
2007	35,993	87,569	298,711	349,028	4,416	775,717
2008	27,413	61,086	222,488	275,057	4,378	590,422
2009	13,841	38,128	117,891	138,297	2,598	310,755
2010	15,415	38,290	122,378	145,949	2,913	324,945
2011	22,036	46,548	155,944	185,606	3,377	413,511
Total	317,213	639,993	2,388,347	2,534,553	70,460	5,950,566

Table 8.E.2
Small Business Loans Originated: \$100,001 to \$250,000 by Tract MFI
 8. Cleveland Housing Market Area
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	115	111	570	500	39	1,335
2001	121	155	783	674	57	1,790
2002	130	190	756	764	77	1,917
2003	101	226	582	654	25	1,588
2004	135	230	619	653	25	1,662
2005	126	205	572	624	15	1,542
2006	86	224	581	624	17	1,532
2007	95	196	538	553	11	1,393
2008	78	153	473	528	13	1,245
2009	37	139	313	387	13	889
2010	84	162	474	535	16	1,271
2011	88	166	510	570	14	1,348
Total	1,196	2,157	6,771	7,066	322	17,512
Loan Amount (\$1,000s)						
2000	19,485	19,862	99,248	88,863	7,254	234,712
2001	21,284	27,968	139,130	120,690	10,747	319,819
2002	23,853	35,071	136,320	134,073	14,919	344,236
2003	17,684	40,282	104,380	118,013	4,396	284,755
2004	24,204	41,650	111,523	117,327	4,699	299,403
2005	23,314	37,638	103,475	111,644	2,644	278,715
2006	15,761	40,562	105,094	112,446	3,115	276,978
2007	16,942	35,490	96,514	98,279	2,014	249,239
2008	14,615	27,444	82,884	94,234	2,396	221,573
2009	6,703	24,958	54,525	66,919	2,493	155,598
2010	15,760	29,457	86,093	95,050	2,612	228,972
2011	16,749	29,470	90,177	101,938	2,402	240,736
Total	216,354	389,852	1,209,363	1,259,476	59,691	3,134,736

Table 8.E.3
Small Business Loans Originated: More than \$250,000 by Tract MFI
 8. Cleveland Housing Market Area
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	103	96	580	500	61	1,340
2001	122	136	741	640	60	1,699
2002	147	168	827	779	84	2,005
2003	90	249	705	706	29	1,779
2004	124	256	734	754	38	1,906
2005	136	232	660	751	26	1,805
2006	129	221	612	705	24	1,691
2007	91	213	593	654	13	1,564
2008	81	196	452	582	16	1,327
2009	75	151	412	481	12	1,131
2010	118	251	604	670	23	1,666
2011	89	212	554	621	19	1,495
Total	1,305	2,381	7,474	7,843	405	19,408
Loan Amount (\$1,000s)						
2000	53,722	49,342	302,326	254,275	31,722	691,387
2001	64,265	72,602	386,382	341,387	33,209	897,845
2002	78,140	92,523	445,613	414,725	46,998	1,077,999
2003	49,189	139,668	373,437	382,940	13,661	958,895
2004	61,590	146,198	392,004	408,961	20,656	1,029,409
2005	76,651	130,160	357,400	418,477	15,049	997,737
2006	71,128	128,637	333,511	395,606	14,692	943,574
2007	50,183	117,244	321,010	365,509	7,488	861,434
2008	43,791	109,521	238,153	325,279	9,194	725,938
2009	42,144	86,576	214,366	266,980	7,416	617,482
2010	67,125	145,389	333,750	366,950	12,348	925,562
2011	53,647	120,671	286,891	327,315	11,100	799,624
Total	711,575	1,338,531	3,984,843	4,268,404	223,533	10,526,886

Table 8.E.4
Small Business Loans to Businesses with Gross Annual Revenues of Less Than
\$1 Million by Tract MFI
 8. Cleveland Housing Market Area
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	791	1,030	5,633	5,011	233	12,698
2001	1,031	1,398	7,071	5,947	382	15,829
2002	720	985	5,235	4,867	301	12,108
2003	765	1,748	6,149	6,169	88	14,919
2004	765	1,721	6,116	6,142	89	14,833
2005	982	2,380	9,034	9,061	82	21,539
2006	1,093	2,663	10,453	10,466	104	24,779
2007	1,194	2,900	11,164	11,338	90	26,686
2008	727	1,759	7,033	7,228	61	16,808
2009	316	911	3,379	3,793	28	8,427
2010	325	898	3,191	3,508	33	7,955
2011	569	1,259	4,875	5,644	64	12,411
Total	9,278	19,652	79,333	79,174	1,555	188,992
Loan Amount (\$1,000s)						
2000	37,222	38,350	242,044	219,579	18,256	555,451
2001	37,705	54,140	281,206	281,780	15,795	670,626
2002	57,604	69,737	318,828	323,338	25,914	795,421
2003	28,045	84,574	269,150	277,992	6,487	666,248
2004	35,095	82,525	230,748	251,710	6,131	606,209
2005	37,341	78,001	253,993	280,940	3,631	653,906
2006	27,345	76,300	266,086	294,342	3,648	667,721
2007	30,902	67,395	253,961	273,227	2,962	628,447
2008	21,476	46,584	173,947	203,180	3,856	449,043
2009	6,846	32,189	108,481	125,862	761	274,139
2010	13,421	41,868	133,538	160,479	3,206	352,512
2011	19,713	41,690	144,252	175,894	2,000	383,549
Total	352,715	713,353	2,676,234	2,868,323	92,647	6,703,272

F. COMPLAINT DATA

This section contains data regarding fair housing complaints, as provided by the U.S. Department of Housing and Urban Development (HUD), the Ohio Civil Rights Commission (OCRC), the Fair Housing Contact Service (FHCS), the Housing Resource and Advocacy Center, and the Fair Housing Resource Center (FHRC).

HUD COMPLAINTS

Table 8.F.1
Fair Housing Complaints by Basis
 8. Cleveland Housing Market Area
 2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color	2	3	2	2	1	1			1	12
Disability	45	50	62	23	68	33	43	35	17	376
Family Status	10	13	24	19	26	90	47	66	35	330
National Origin	3	8	9	10	36	15	22	5	4	112
Race	45	43	51	45	82	54	44	18	15	397
Religion	2	6	3	3	11		2	2	4	33
Sex	5	5	16	13	11	19	25	9	8	111
Total Bases	112	128	167	115	235	212	183	135	84	1,371
Total Complaints	98	118	129	91	185	196	164	122	71	1,174

Table 8.F.2
Fair Housing Complaints by Issue
 8. Cleveland Housing Market Area
 2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Discrimination in terms, conditions or privileges relating to rental	16	39	37	21	28	38	41	21	7	248
Discriminatory refusal to rent	37	40	31	27	35	22	32	10	12	246
Failure to make reasonable accommodation	20	20	34	12	19	12	23	21	8	169
Discriminatory advertisement - rental		2	3		17	77	8	29	26	162
Discriminatory terms, conditions, privileges, or services and facilities	5	11	16	15	31	17	25	25	16	161
Discriminatory advertising, statements, and notices	6	5	6	4	23	12	45	29	10	140
Discriminatory acts under Section 818 (coercion, etc.)	13	18	11	7	4	8	11	11	7	90
Discriminatory refusal to rent and negotiate for rental	3	9	13	3	6	9	7	3	2	55
Other discriminatory acts	6	4	1	5	3	1	3	5	4	32
Otherwise deny or make housing available			1	1		5	10	9		26
False denial or representation of availability - rental	1	2	3		6	6	1	1		20
Discrimination in services and facilities relating to rental	1		1	5	3	3	4	3		20
Using ordinances to discriminate in zoning and land use	1	1	1		15	1				19
Discriminatory financing (includes real estate transactions)	2		6	5	2	1			1	17
Non-compliance with design and construction requirements (handicap)	2	2	3		3	3	1	1		15
Discriminatory refusal to negotiate for rental			2	1	4	5	2			14
Discrimination in terms, conditions, privileges relating to sale	2	1	2		2	1	3	1		12
Discrimination in making of loans		1		3	2	1	3	1		11
Discriminatory refusal to sell	1		2	2	1	1	3			10
Discrimination in the terms or conditions for making loans	1		1	1		2	3	2		10
Failure to permit reasonable modification	3	2	1		3		1			10
False denial or representation of availability			2		5	1				8
Discriminatory refusal to sell and negotiate for sale	1		2			1	1			5
Steering			1		1	2	1			5
Discriminatory advertising - sale					2	2				4
Refusing to provide insurance	2			2						4
Redlining - insurance	1				3					4
Discrimination in services and facilities relating to sale	1					1	1			3
Discriminatory refusal to negotiate for sale					1	1				2
Discrimination in the selling of residential real property					1		1			2
Discrimination in the appraising of residential real property						2				2
Redlining - mortgage			2							2
Restriction of choices relative to a rental			1			1				2
Failure to provide an accessible building entrance		1					1			2
Failure to provide accessible and usable public and common user areas	1		1							2
Failure to provide usable doors	1								1	2
Blockbusting - rental						1				1
Discrimination in the brokering of residential real property				1						1
Discriminatory brokerage service					1					1
Use of discriminatory indicators	1									1
Refusing to provide municipal services or property						1				1
Total Issues	128	158	184	115	221	238	231	172	94	1,541
Total Complaints	98	118	129	91	185	196	164	122	71	1,174

Table 8.F.3
Fair Housing Complaints by Closure Status
 8. Cleveland Housing Market Area
 2004–2012 HUD Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Administrative Closure	14	22	12	11	28	26	27	9	1	150
Cause (FHAP)	8	14	14	9	30	76	39	31	6	227
Charged (HUD)						1				1
Conciliated / Settled	42	41	59	23	61	53	65	30	14	388
DOJ Closure	1				7					8
No Cause	33	41	44	48	59	39	33	29		326
Open						1		23	50	74
Total Complaints	98	118	129	91	185	196	164	122	71	1,174

HUD Complaints Found With Cause

Table 8.F.4
Fair Housing Complaints Found With Cause by Basis
 8. Cleveland Housing Market Area
 2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color	1			1						2
Disability	29	30	38	13	43	18	28	16	4	219
Family Status	8	8	16	10	18	78	40	41	15	234
National Origin	1	1	5	1	16	8	10	4		46
Race	16	13	20	11	33	23	22	3	1	142
Religion	1	1	1		3			2		8
Sex	2	1	5	3	3	11	15	3	2	45
Total Bases	58	54	85	39	116	138	115	69	22	696
Total Complaints	51	55	73	32	98	130	104	61	20	624

Table 8.F.5
Fair Housing Complaints Found With Cause by Issue
 8. Cleveland Housing Market Area
 2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Discriminatory advertising, statements, and notices	4	4	4	3	15	9	34	22	2	97
Using ordinances to discriminate in zoning and land use	1		1		7					9
Discrimination in services and facilities relating to rental			1	2		2	3			8
False denial or representation of availability			2		4	1				7
Discrimination in making of loans		1		2	1		3			7
Failure to permit reasonable modification	3	2	1		1					7
Discriminatory refusal to negotiate for rental			1		2	3				6
Discriminatory terms, conditions, privileges, or services and facilities	1	5	5	3	15	9	11	7	2	58
Discriminatory acts under Section 818 (coercion, etc.)	6	5	6	2	3	3	3	4		32
Discriminatory financing (includes real estate transactions)	1		1			1				3
Discrimination in the terms or conditions for making loans				1		1	1			3
Discrimination in terms, conditions, privileges relating to sale	1		1				1			3
Discriminatory refusal to rent and negotiate for rental	2	3	7	1	4	4	6	1		28
Discriminatory refusal to sell			1				1			2
Discriminatory refusal to sell and negotiate for sale			2							2
Discriminatory advertising - sale					1	1				2
Discrimination in services and facilities relating to sale	1						1			2
Steering						1	1			2
Restriction of choices relative to a rental			1			1				2
Discriminatory refusal to rent	20	21	17	10	21	17	20	7	2	135
False denial or representation of availability - rental		2	2		3	5	1			13
Discriminatory advertisement - rental		1	3		14	70	7	15	12	122
Discrimination in terms, conditions or privileges relating to rental	8	14	17	9	17	18	24	11	2	120
Failure to make reasonable accommodation	14	13	22	8	14	11	16	10	2	110
Otherwise deny or make housing available			1			2	5	3		11
Other discriminatory acts	2			2	2		2	1	1	10
Non-compliance with design and construction requirements (handicap)	2	2	1		3		1	1		10
Blockbusting - rental						1				1
Discrimination in the appraising of residential real property						1				1
Refusing to provide insurance	1									1
Failure to provide an accessible building entrance		1								1
Failure to provide accessible and usable public and common user areas			1							1
Total Issues	67	74	98	43	127	161	141	82	23	816
Total Complaints	51	55	73	32	98	130	104	61	20	624

OHIO CIVIL RIGHTS COMMISSION COMPLAINTS

Table 8.F.6
Fair Housing Complaints by Basis
 8. Cleveland Housing Market Area
 2004–2012 OCRC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color	3	5	1	1	2	2		1	1	16
Disability	48	51	103	31	49	29	40	33	7	391
Family Status	10	12	16	18	28	21	29	33	8	175
Gender	8	9	23	18	15	14	28	11	6	132
National Origin	5	8	5	10	32	3	16	3		82
Race	49	53	47	48	39	41	41	22	7	370
Religion	2	4	3	6	1		3	3		22
Retaliation	12	25	15	18	14	11	15	15	6	131
Other		1		2	1	1		1		6
Total Bases	137	168	213	152	206	120	172	122	35	1,325
Total Complaints	113	133	173	106	156	102	142	90	23	1,038

Table 8.F.7
Fair Housing Complaints by Issue
 8. Cleveland Housing Market Area
 2004–2012 OCRC Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Advertising	8	2	2		4	11	19	19	7	72
Discharge				2						2
Exclusion	27	51	8	23	49	15	15			188
Harassment	13	24	5	16	13	17	6	2	3	99
Intimidation	5	10	4	3	4	2	2	1	4	35
Maternity				1						1
Other	44	43	69	43	50	35	71	33	2	390
Reasonable Accommodation	20	20	63	11	25	10	12	14	4	179
Recall			1							1
Sexual Harassment	1	4	1	4	4	2	1	1	3	21
Terms and Conditions	29	43	38	27	51	29	33	33	5	288
Testing				1						1
Total Issues	147	197	191	131	200	121	159	103	28	1,277
Total Complaints	113	133	173	106	156	102	142	90	23	1,038

Table 8.F.8
Fair Housing Complaints by Closure Status
 8. Cleveland Housing Market Area
 2004–2012 OCRC Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Administrative Closure	4	1		7	1	2	6	2	4	27
CP Failed to Cooperate	1	3	3	6	2	8	11	4		38
CP Refused Full Relief			32							32
CP Withdrawal – No Benefit	17	19	6	6	10	5	20	7	1	91
Failure to Locate Charging Party	1		1		2					4
Inquiry Closed		1								1
No Cause Finding Issued	39	44	49	59	54	29	32	36	3	345
No Jurisdiction		3	4	2	2	3	3		1	18
Open Charge Closed By Legal Activity		4	5		1					10
Settlement With Benefits	15	15	37	13	39	39	38	24	8	228
Successful Conciliation	3	2	5	4	15	5	9	2		45
Withdrawal With Benefits	31	41	31	9	30	11	23	15	6	197
Missing	2									2
Total Complaints	113	133	173	106	156	102	142	90	23	1,038

FAIR HOUSING CONTACT SERVICE COMPLAINTS

Table 8.F.9
Fair Housing Complaints by Basis
 8. Cleveland Housing Market Area
 2004–2012 FHCS Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Ancestry	1									1
Color	1			1						2
Criminal Background							1			1
Disability	5		7	2	1	2		1		18
Familial Status							3	2		5
National Origin			2				1			3
Race	1		4	1			1			7
Retaliation	1									1
Sex			2	1			2	2		7
Other							1			1
Total Bases	9	0	15	5	1	2	9	5	0	46
Total Complaints	6		14	3	1	2	4	3		33

Table 8.F.10
Fair Housing Complaints by Closure Status
 8. Cleveland Housing Market Area
 2004–2012 FHCS Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Closed			3	2				1		6
Dismissed										
Elected not to pursue										
Independently resolved						1				1
Inquiry			4		1					5
Lack of jurisdiction										
No contact							1			1
No probable cause			2	1			2			5
Pending			2					1		3
Probable cause										0
Reasonable accommodation granted										
Reasonable modification granted										
Referred for other assistance							1			1
Settled			3			1		1		5
Settled through OCRC										
Withdrawal of Charge										
Missing	6									6
Total Complaints	6	0	14	3	1	2	4	3	0	33

FAIR HOUSING RESOURCE CENTER COMPLAINTS

Table 8.F.11
Fair Housing Complaints by Basis
 8. Cleveland Housing Market Area
 2004–2012 FHRC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability	44	24	24	13	4	14	26	12	16	177
Family Status	5	12	5	3	2	2		2	1	32
National Origin	4		4					1		9
Race	16	6	6	2	4	2	6	6	2	50
Sex	2		3			1				6
Other	2	4	11	17	11	6	10	14	13	88
Total Bases	73	46	53	35	21	25	42	35	32	362
Total Complaints	73	46	53	35	21	25	41	31	31	356

Table 8.F.12
Fair Housing Complaints by Issue Type
 8. Cleveland Housing Market Area
 2004–2012 FHRC Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Rental	73	45	51	28	19	24	40	31	30	341
Sales		1								1
Advertising			2	7	2	1	1		1	14
Total	73	46	53	35	21	25	41	31	31	356

Table 8.F.13
Fair Housing Complaints by Closure Status
 8. Cleveland Housing Market Area
 2004– 2012 FHRC Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Investigated and referred to HUD/OCRC	2	1			1	2	1			7
Investigated and settled		1								1
Settled through counseling	64	40	45	32	19	19	35	26	25	305
Complaint filed in federal court								1		326
Reasonable Accommodation Granted	6	4	3	3		4	5	4	6	35
Referred to OCRC	1		5		1					7
Total	73	46	53	35	21	25	41	31	31	356

THE HOUSING RESEARCH AND ADVOCACY CENTER

Table 8.F.13
Fair Housing Complaints by Basis
 8 Cleveland Housing Market Area
 2004–2012 HRAC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability	2		9	14	18	22	55	42	52	214
Race	2	11	13	12	21	14	24	15	25	137
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	1	1	3	12	4	2	24
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
Sexual Harassment						1				1
Total Bases	6	13	36	41	53	55	118	86	152	560
Total Complaints	6	13	24	38	48	49	103	77	98	456

Table 8.F.14
Fair Housing Complaints by Issue

8 Cleveland Housing Market Area
 2004–2012 HRAC Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Rental	6	10	21	30	44	48	93	75	85	412
Sale		3	2	7	2		1	2	2	19
Other			1	1	1	1	4		9	17
Shelter							5			5
Mortgage					1				2	3
Total	6	13	24	38	48	49	103	77	98	456
Total Complaints	6	13	24	38	48	49	103	77	98	456

Table 8.F.15
Fair Housing Complaints by Action Taken

8 Cleveland Housing Market Area
 2004–2012 HRAC Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Referred to OCRC	4	12	11	21	30	13	40	21	43	195
Fair Housing Info Given			8	7	9	22	24	30	56	156
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
Total	7	21	30	46	59	47	96	82	118	506
Total Complaints	6	13	24	38	48	49	103	77	98	456

G. FAIR HOUSING SURVEY FOR HOUSING STAKEHOLDERS DATA

This section presents public involvement data gathered through the 2012–2013 Fair Housing Survey for Housing Stakeholders.

Table 8.G.1

Primary Role of Respondent
8. Cleveland Housing Market Area
2012–2013 Fair Housing Survey for Housing
Stakeholders Data

Primary Role	Total
Advocate/Service Provider	29
Banking/Finance	2
Condo or Homeowner Association Leader	2
Construction/Development	5
Insurance	1
Local Government	17
Property Management	2
Real Estate	6
Resident Advisory Council Leader	1
Other Role	16
Total	81

FEDERAL, STATE, AND LOCAL LAWS

Table 8.G.2

**Familiarity with Fair
Housing Laws**

8. Cleveland Housing Market Area
2012–2013 Fair Housing Survey
for Housing Stakeholders Data

Familiarity	Total
Not Familiar	3
Somewhat Familiar	26
Very Familiar	29
Missing	23
Total	81

Table 8.G.3
Perceptions About Fair Housing Laws

8. Cleveland Housing Market Area
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?	52	4	2	23	81
Are fair housing laws difficult to understand or follow?	14	31	11	25	81
Do you think fair housing laws should be changed?	13	24	19	25	81
Do you think fair housing laws are adequately enforced?	43	9	3	26	81

Table 8.G.4
Fair Housing Activities

8. Cleveland Housing Market Area
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?		43	9	3	26	81
Have you participated in fair housing training?		38	6	1	36	81
Are you aware of any fair housing testing?		24	21	10	26	81
Testing and education	Too Little	Right Amount	Too Much	Don't Know	Missing	Total
Is there sufficient outreach and education activity?	21	16	2	14	28	81
Is there sufficient testing?	12	6	3	34	26	81

Table 8.G.5

Protected Classes

8. Cleveland Housing Market Area
2012–2013 Fair Housing Survey for Housing Stakeholders Data

Protected Class	Total
Family Status	32
Religion	26
Gender	26
National Origin	24
Color	15
Sexual Orientation	15
Age	13
Military	13
Disability	5
Ancestry	7
Ethnicity	5
Race	3
Other	27
Total	212

Table 8.G.6
Fair Housing Violation Referrals
 8. Cleveland Housing Market Area
 2012–2013 Fair Housing Survey for Housing
 Stakeholders Data

Referral	Total
ACLU	1
City	3
Cleveland Fair Housing Board	4
Cleveland Tenants Organization	6
County	1
Don't Know	2
Fair Housing Resource Center	14
Heights Community Congress	2
Housing Advocates, Inc.	2
Housing Research and Advocacy Center	2
HUD	10
Legal Aid	3
Medina County Fair Housing	2
OCRC	11
Other	3
Total	66

LOCAL FAIR HOUSING

Table 8.G.7
Local Fair Housing
 8. Cleveland Housing Market Area
 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?	28	17	5	31	81
Are there any specific geographic areas that have fair housing problems?	10	17	23	31	81
Are there any specific groups in that face housing discrimination?	12	15	21	33	81

FAIR HOUSING IN THE PRIVATE SECTOR

Table 8.G.8
Barriers to Fair Housing in the Private Sector
 8. Cleveland Housing Market Area
 2012–2013 Fair Housing Survey for Housing Stakeholders Data

Question	Yes	No	Don't Know	Missing	Total
Are you aware of any questionable practices or barriers to fair housing choice in:					
The rental housing market?	13	28	11	29	81
The real estate industry?	10	25	16	30	81
The mortgage and home lending industry?	13	22	18	28	81
The housing construction or accessible housing design fields?	9	23	21	28	81
The home insurance industry?	9	20	24	28	81
The home appraisal industry?	9	21	22	29	81
Any other housing services?	5	23	23	30	81

FAIR HOUSING IN THE PUBLIC SECTOR

Table 8.G.9
Barriers to Fair Housing in the Public Sector
 8. Cleveland Housing Market Area
 2012–2013 Fair Housing Survey for Housing Stakeholders Data

Question	Yes	No	Don't Know	Missing	Total
----------	-----	----	------------	---------	-------

Are you aware of any questionable practices or barriers to fair housing choice in:					
Land use policies?	7	31	13	30	81
Zoning laws?	10	23	17	31	81
Occupancy standards or health and safety codes?	9	27	15	30	81
Property tax policies?	3	27	21	30	81
Permitting process?	4	25	21	31	81
Housing construction standards?	4	27	19	31	81
Neighborhood or community development policies?	7	27	17	30	81
Limited access to government services, such as employment services?	16	26	7	32	81
Public administrative actions or regulations?	6	23	22	30	81

NARRATIVE COMMENTS

Federal, State, and Local Laws

Table 8.G.10
How did you become aware of fair housing laws?

8. Cleveland Housing Market Area
2013 Fair Housing Survey Data

Comments:
15 years of Community Development and working with Federal CDBG, HOME and other funds
25 years of working in the non-profit field of affordable housing
As a landlord and community development professional
Attended Fair Housing Commission meetings while working for a different county.
Attending workshops
Because of my professional work experience in areas of community development and public housing.
Being educated as a fair housing board member
By living in communities that stressed pro-integration policies.
Conferences, Meetings, Studying them...etc...
experience
gdgdg
I am an approved Continuing Education provider and Instructor for the Division of Real Estate and regularly teach Fair Housing to real estate licensees.
I am the Fair Housing Coordinator for the County
I have worked in the Fair Housing non-profit field since 2000.
I hold a real estate license in Ohio and it is a requirement of licensing.
In order to acquire a real estate license we must take fair housing at both the state and local level as part of our real estate law course, and then re-take it every three years in order to maintain our license
Internet HUD NFCC
It be the job for which I do.
Research and seminars.
The Housing Authority must be very cognizant of the fair housing laws as an owner and manager of various types of housing programs.
The housing authority works closely with it's local fair housing agency to serve tenants in common
The PHA does periodic trainings for staff, and I also regularly attend housing conferences and workshops.
Through participating on various community related development efforts that dealt with housing regulations.
Training sessions and workshops are attended by staff. We review HUD notifications.
Training through the City of Lakewood
Trainings and review of regulations
We're a fair housing agency.
Worked as a CSR for Banks- Loan officer and now in the City Fair Housing Board
Working closely and sharing contracts with The Housing Research and Advocacy Center
Working with city government

Table 8.G.11
How should fair housing laws be changed?

8. Cleveland Housing Market Area

2013 Fair Housing Survey Data

Comments:
Add ban the box...Discrimination based on Felony/arrest records.
Additional protected classes, particularly Sexual Orientation should be added
All People with Children don't need to be in ashelter for no longer than 2 days because this is to tramatic for all involved be it a fire abuse etc.. Too many empty homes that need to be occupied and adaquately repaired.First time done job that last a lifetime no work done shabby to get more money in the near futrue. On going program to assist elderly in any repairs of older sturtured

property.
 Fair housing laws need to be more inclusive off vulnerable populations not just based on ethnicity and disability. seniors, renters, low income, populations, and students should all be protected classes in my opinion.
 Federal and/or Ohio Law should include sexual orientation.
 More funding needs to be provided for investigation & enforcement of the current laws.
 Sexual Orientation should be added.
 should add sexual preference or identiy
 They should be strengthened for enforcement purposes and to include additional protected classes.
 To afford greater protection to wider groups and harsher penalties for violators.
 to included formerly incarcerated persons as a portected class

Local Fair Housing

Table 8.G.12
Are there any specific geographic areas that have fair housing problems?

8. Cleveland Housing Market Area
 2013 Fair Housing Survey Data

Comments:
<p>All areas in the County have Fair Housing issues. Personally seen them in Cleveland, North Olmsted, Lakewood, Westlake, Rocky River, Olmsted Falls, South Euclid, Cleveland Hts., Solon, Mayfield Hts., Strongsville, Middleburg Hts., Shaker Hts, Cuyahga Hts. (race, national origin, religion, family status, disability)</p> <p>All geographic areas. Housing discrimination occurs everywhere.</p> <p>Complaints cluster in higher density areas but nothing that would seem out of the norm in number of complaints in any one area</p> <p>Few people of color located anywhere in the county except for Painesville.</p> <p>Little Italy, various other enclaves in the city, specifically ethnic ones</p> <p>Suburbs have limited development through restictive zoning</p> <p>The City of Mentor defers all of their CDBG funds to Western Reserve Community Development. The net effect is the restriction of providing basic Life Safety funds to repair Mentor Seniors and Disabled homes.</p> <p>There is a perception of Fair housing issues in key growth areas of our city.</p>

Table 8.G.13
Are there any specific groups in that face housing discrimination?

8. Cleveland Housing Market Area
 2013 Fair Housing Survey Data

Comments:
<p>African Americans, Hispanics would seem to be most impacted</p> <p>All members of protected classes and individuals who have been incarcerated, pay their rent with sources of income other than employment, among others.</p> <p>Elderly/disabled; families with children in need of rentals.</p> <p>Formerly incarcerated persons often face discrimination when attempting secure housing</p> <p>Muslims/Arabs, Latinos (all), African Americans, families with children, people with disabilities</p> <p>Not so much discrimination as the ability to afford to live in the community. Affordable housing option are limited.</p> <p>Possibly-Those with felony records</p> <p>Racial and ethnic minorities</p> <p>Racial minorities in particular seem most prevalent</p> <p>The elderly and disbaled.</p>

Table 8.G.14
Please share any additional comments.

8. Cleveland Housing Market Area
 2013 Fair Housing Survey Data

Comments:
<p>All of the potential violations of the federal, state, and local fair housing laws occur in our area. Housing discrimination and segregated communities are a growing problem that effect not only where one lives but in many respects ones life chances through access to quality schools, transportation, employment, and a healthy environment. The health and sustainability of the community as a whole suffers without housing choice and integration. I would be happy to talk with you about any of these issues in more detail.</p> <p>given the fast number of persons returning to their community after a period of incarceration I would strongly advocate for making such persons a protected class to end housing discrimination against them.</p> <p>It is an important issue.</p> <p>Several of the questions such as, "...Do you think fair housing laws serve a useful purpose" are not easily answered "yes" or "no", and "don't know" isn't of much use to you for the survey.</p> <p>There needs to be more effort assisting Condo homeowners in the resolution of their complaints against Condo associations.</p>

Fair Housing in the Private Sector

Table 8.G.15
Are you aware of any questionable practices or barriers to fair housing choice in the rental housing market?

8. Cleveland Housing Market Area
 2013 Fair Housing Survey Data

Comments:
<p>Family status & marital status - refusing to rent to a single mom with children; other attempts to refuse to allow children.</p> <p>I think it is arbitrary that rental properties under 3 units is exempt from Fair Housing practices</p> <p>Landlords who don't want to rent to families with children and try to advertise "no children" which is illegal.</p> <p>Making reasonable accomodations; families with children; therapy animals. Many non-traditional landlords (people who couldn't sell their homes) do not understand Fair Housing.</p> <p>Ongoing turnover in managers and new rental creates a lack of knowledge resulting in poor decisions</p> <p>Refusal to rent, differences in price/fees, denial of reasonable modifications & accommodations,</p> <p>Segregation resulting from housing discrimination against all protected classes Lack of accessible housing for people with disabilities Discrimination against families with children based on incorrect occupancy We would be happy to discuss these issues in more detail.</p> <p>Specific neighborhoods - less welcoming to minorities, like Little Italy...Gentrifying neighborhoods like Tremont with little affordable housing</p> <p>There are landlords who prefer not to rent to people with what they consider to be too many children. I have also heard of families who have trouble renting housing in certain areas because of reluctance to accept Housing Choice Vouchers. This can make it difficult for families to have adequate housing options.</p> <p>Zoning requirments for minimum square footage conflict with HUD requirments</p>

Table 8.G.16
Are you aware of any questionable practices or barriers to fair housing choice in the real estate industry?

8. Cleveland Housing Market Area
 2013 Fair Housing Survey Data

Comments:
<p>I know someone who sued their realtor because they were not being permitted to view all available housing within a community. The realtor was showing African American families homes in specific sections of the city.</p> <p>Mental disabilities were the basis of eviction of a Senior from her home.</p> <p>see above</p> <p>Steering Blockbusting Lack of knowledge about fair housing laws Lack of supervision and training of real estate agents by brokerage firms</p> <p>Steering, differences in level of service</p> <p>tend to be biased against Cleveland neighborhoods</p> <p>The amount of segregation must point to some racial steering.</p> <p>The industry is pretty well trained and the consequences for violation are well known.</p>

Table 8.G.17**Are you aware of any questionable practices or barriers to fair housing choice in the mortgage and home lending industry?**8. Cleveland Housing Market Area
2013 Fair Housing Survey Data**Comments:**

A lot of the foreclosures on homes in the area were filed against minorities, many women who were victims of lending scams
 A neighbor of mine was turned down for a refinance mortgage when her lender refused to consider her disability income.
 Differences in level of service, rates, loan products, application requirements
 Disproportionate loan denials
 HUD regulation prohibit home improvement grants & loans to persons living in mobile homes in mobile home parks.
 It is my belief that people of different races are treated substantially differently by the lending community. Minorities are denied access to credit or charged higher interest rates.
 Loan products that were developed such as the interest only product and the ARM loan product created a scenario that adversely impacted racial minorities more than other ethnic groups. These loan products were used more consistently in urban areas to finance homes and rental properties.
 Mortgages are offered in only certain areas and Private mortgage insurance is disproportionately applied to minorities
 People of color are denied and receive high-cost loans more often.
 Redlining Different terms and conditions Inaccessible information about lending practices
 Women and racial minorities have higher interest rate and are denied loan modifications at a higher rate than Whites.

Table 8.G.18**Are you aware of any questionable practices or barriers to fair housing choice in the housing construction or accessible housing design fields?**8. Cleveland Housing Market Area
2013 Fair Housing Survey Data**Comments:**

Affordable housing not being built by developers
 Inaccessible housing
 Lack of knowledge or ignoring building code and fair housing law requirements Differences in treatment based on location/neighborhood of property.
 More Universal Design is needed.
 Recently, K&D got in a major suit over building inaccessible housing and bribing building officials
 When buildings are accessible it is often side, hard to get to entrance.

Table 8.G.19**Are you aware of any questionable practices or barriers to fair housing choice in the home insurance industry?**8. Cleveland Housing Market Area
2013 Fair Housing Survey Data**Comments:**

In the insurance industry many companies fail to insure homes in communities with an older housing stock and they refuse in some respects to insure rental property due to age of the housing and the type of features that exist in the homes. Most of the homes in urbanized areas are occupied by minorities and renters which are protected classes. By virtue of looking at housing age and rental factors you are by default making it difficult to obtain or maintain insurance for certain groups. Even if the basis for insurance companies' decision are not racially motivated, the factors in which insurance companies make decisions on who to insure and at what rate will impact certain groups more than others.
 Insurance companies drop Seniors' homeowner's insurance policies prior to the completion of HUD assistance application & construction process.
 Limiting policies and coverages to racial minorities
 often difficult to get insurance coverage in low income areas
 Redlining Different terms and conditions Inaccessible information about practices Differences in treatment based on location/neighborhood of property.

Table 8.G.20**Are you aware of any questionable practices or barriers to fair housing choice in the home appraisal industry?**8. Cleveland Housing Market Area
2013 Fair Housing Survey Data**Comments:**

Appraisers often use language in describing neighborhoods and properties that violate Fair Housing requirements. Basing home values on the racial & ethnic composition of neighborhoods.

Have not seen anything as blatant as example cited above

I think the appraisal industry is fully out of whack and contributing to the slow housing market. They have over-corrected and hampering sales and legitimate increase in values which hurts everyone

In the past Black neighborhoods had houses appraised to high and now with the decline they have declined in value at a greater percentage than similar 'white' neighborhoods

its a known fact that lower income minority communities housing stock appraises lower than non-minority communities. The reason for this one can assume is not primarily condition of the housing stock. when racial composition changes in neighborhoods so does the housing values in those communities.

many homes in minority areas were valued below there actual value

Redlining Different terms and conditions Inaccessible information about practices Differences in treatment based on location/neighborhood of property.

The changing real estate market has affected rental comparables and property values.

Table 8.G.21**Are you aware of any questionable practices or barriers to fair housing choice in any other housing services?**8. Cleveland Housing Market Area
2013 Fair Housing Survey Data**Comments:**

Differences in treatment of individuals and maintenance of property based on location/neighborhood of property.

In Cleveland, a family member who is White has found it difficult to foreclosure prevention assistance. One person she talked to told her their service was only for Black people.

In Ward 1 in Garfield minority interest seeking to purchase a home in the Garfield community are steered to the Ward 1 area of the City. Many of those minorities who desire to live in that community because of the school system end up in Ward 1 because that area of Garfield falls under the CMSD jurisdiction. By steering minorities to this area those families with school aged children don't get the benefit of going to Garfield schools, rather they must attend John Adams which is a CMSD institution.

Lack or low and moderate rental units

Fair Housing in the Public Sector**Table 8.G.22****Are you aware of any questionable practices or barriers to fair housing choice in land use policies?**8. Cleveland Housing Market Area
2013 Fair Housing Survey Data**Comments:**

Concentration of multi-family housing in segregated areas.

It is more economic but large lot zoning excludes many from living here, although not specifically for Fair Housing

Land use for multi-family units is limited to 3 major cities

Localities have been increasing densities allowed in areas as sewers are extended.

more and more we are seeing the desire to create compact mixed use communities that offer convenience by promoting walkability and creates sustainable developments. However many of the developments that are created concentrate people of similar incomes and social status. We are moving toward a mixed income scenario with some developments however it is not as much as we need

Policies that concentrate multi-family housing in limited areas

There are townships that do not provide for multi-family housing at all.

Table 8.G.23**Are you aware of any questionable practices or barriers to fair housing choice in zoning laws?**8. Cleveland Housing Market Area
2013 Fair Housing Survey Data**Comments:**

Actually Geauga County Commissioners are quite open and active in placing homes for the developmentally disabled Group homes and other such uses are restricted and need to be heard before the Board of Zoning Appeals

Laws that restrict placement of group homes

Often group homes are a "conditional use".

Prohibition of group homes. Restrictive definitions of families.

Zoning laws restrict minimum square footage to large single family homes

Table 8.G.24**Are you aware of any questionable practices or barriers to fair housing choice in occupancy standards or health and safety codes?**8. Cleveland Housing Market Area
2013 Fair Housing Survey Data**Comments:**

Certain suburbs are more active in monitoring and forcing the correction of health and safety codes than others. There is often more attention paid to higher income subsections of the community.

Inadequate code enforcement in communities of color and immigrant communities.

No ability to enforce health codes in rental properties

Restrictions on definition of family, overly restrictive occupancy

Russell Township recently adopted an extremely limited definition of family in an effort to keep out "house-mates".

There are health and safety code violations that are not adequately enforced in low income minority communities due to the impact of the housing crisis (foreclosed/substandard housing) in many of these areas. The volume of housing issues outweighs our ability to police.

Unsure, but there may be concerns more around migrant workers.

Table 8.G.25**Are you aware of any questionable practices or barriers to fair housing choice in property tax policies?**8. Cleveland Housing Market Area
2013 Fair Housing Survey Data**Comments:**

County provides funding on an as needed basis for accessibility through CDBG funds and is becoming better equipped in identifying partners that can assist in funding these needs as well.

Disinvestment and foreclosures resulting from lending discrimination result in diminished property values in minority neighborhoods.

No Lake County community is currently providing tax incentives to plan or construct the amount of required Universal Design housing that will be required for the vast increase that baby boomers will need within ten years.

Table 8.G.26**Are you aware of any questionable practices or barriers to fair housing choice in the permitting process?**8. Cleveland Housing Market Area
2013 Fair Housing Survey Data**Comments:**

I am not aware of a community that has translated forms into Spanish within the County.

Permits denied based on protected class or segregated neighborhood. Permit requirements not followed in segregated neighborhoods.

we do not currently offer permitting process information in alternative languages via the internet or otherwise.

Table 8.G.27**Are you aware of any questionable practices or barriers to fair housing choice in housing construction standards?**8. Cleveland Housing Market Area
2013 Fair Housing Survey Data

Comments:
<p>Although accessibility requirements are in the Ohio Building Codes, the local building inspectors have no training on those standards, and approve plans that are not accessible</p> <p>Lack of enforcement. Building officials don't have to certify that residences are accessible prior to construction or occupancy permitting.</p> <p>Lake County Building Department has a track record of being counterproductive in their interaction with the building and design communities. Assistance in understanding guidelines are blocked because of this department's adversarial leadership</p> <p>Most Building Departments and architects are able to refer to online standards</p>

Table 8.G.28**Are you aware of any questionable practices or barriers to fair housing choice in neighborhood or community development policies?**8. Cleveland Housing Market Area
2013 Fair Housing Survey Data

Comments:
<p>Community development efforts are too strongly focused on the areas of greatest need. More effort should be made to strengthen areas with some market confidence so that they can remain solid and grow.</p> <p>Gentrifying neighborhoods focused on eliminating affordable housing, thus a disparate impact on people of color</p> <p>investments in "trendy" neighborhoods result in displacement of current residents</p> <p>policies that encourage development in narrowly defined areas of the community</p> <p>Policies that encourage economic development without considering the impact on existing residential communities when developments occur in racially or ethnically segregated communities.</p>

Table 8.G.29**Are you aware of any barriers that limit access to government services, such as a lack of transportation or employment services?**8. Cleveland Housing Market Area
2013 Fair Housing Survey Data

Comments:
<p>for many with low-incomes transportation to various government services can present a problem if the service is located out of their area.</p> <p>lack of affordable public transportation</p> <p>Lack of transportation as well as the probability of reduced transportation due to budget cuts in public transportation</p> <p>lack of transportation or employment services</p> <p>Limited public transportation.</p> <p>No transportation levy in county so funds for transportation are quite limited</p> <p>Public education of the availability of HUD assistance programs is not being funded or done.</p> <p>Public transit is limit, difficult, and hard to navigate..The ticketing machines are next to impossible. Very hard to use. Disparate impact on the poor and people of color.</p> <p>Public transportation has been shrinking due to budgetary constraints</p> <p>RTA eliminated the circulator and reduced routes in community</p> <p>There is very limited public transportation (by appointment only). Many officials are parttime and not available to residents at times residents can see them.</p> <p>Transportation</p> <p>Transportation system is biased to the automobile.</p> <p>Transportation, especially for people with disabilities.</p>

Table 8.G.30**Are you aware of any questionable practices or barriers to fair housing choice in any other public administrative actions or regulations?**8. Cleveland Housing Market Area
2013 Fair Housing Survey Data

Comments:
<p>Certain cities make it more difficult for landlords to rent out the houses. For example, they may impose high Certificate of Occupancy fees in order to make it less attractive.</p> <p>Definition of family, large lot zoning.</p> <p>Lake County Building Department is required to lead Fair Housing policies but are blocked because of this department's adversarial leadership</p> <p>Sustainable construction requirements and LEED residential developments are targeted for high end properties and developments instead of lower income residential projects.</p> <p>There are many jurisdictions within County and cannot be sure how each is performing</p> <p>There are too many to detail within the scope of this survey.</p>

H. LAND USE PLANNING SURVEY DATA

This section contains data regarding the potential effects of local land use and housing policies on fair housing choice, as gathered from the Fair Housing Survey for Government Officials.

FAIR HOUSING SURVEY FOR GOVERNMENT OFFICIALS

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 was conducted predominately online. Respondents were solicited by mass-distributed emails sent by the NEOSCC, members of the Progress Review Team, and other various organizations in the 12-county region.

This section contains data gathered from the public sector staff in the Cleveland Housing Market Area that received and completed the survey.³⁸

³⁸ For areas with both nonentitlement and entitlement communities, the results of the nonentitlement community government official survey and the entitlement community interviews were summed.

Table 8.H.1
Housing Development
 8. Cleveland Housing Market Area
 2012 Fair Housing Survey for Government Officials Data

Question: Does your jurisdiction have...	Yes	No	Don't Know	Missing	Total
Housing Development					
Definitions for "dwelling unit" or "residential unit"?	25	4	5	28	62
Guidelines that encourage development affordable housing units?	9	18	7	28	62
Any potential barriers to the development of low- to moderate- income housing?	4	18	11	29	62
Guidelines that allow the development of mixed use housing?	17	10	7	28	62
Any potential barriers to the development of mixed use housing?	12	11	11	28	62
Occupancy Standards					
A definition for the term "family"?	19	7	8	28	62
Residential occupancy standards or limits?	11	9	13	29	62
Special Needs Housing					
A definition for the term "disability"?	7	16	7	32	62
Development standards for making housing accessible to persons with disabilities?	7	13	9	33	62
A process by which persons with disabilities can request modification to the jurisdiction's policies?	8	12	10	32	62
Standards for the development of senior housing?	6	15	8	33	62
Guidelines that distinguish senior citizen housing from other residential uses?	13	8	8	33	62
Guidelines for developing housing for any other special needs populations?	12	11	7	32	62
Fair Housing Policies					
A fair housing ordinance, policy, or regulation?	16	4	9	33	62
Policies or practices for "affirmatively furthering fair housing"?	14	8	7	33	62

I. IMPEDIMENTS

The 2013 Northeast Ohio Regional Analysis of Impediments to Fair Housing Choice uncovered several potential issues regarding fair housing in the Cleveland Housing Market Area. Identification of these items as probable impediments to fair housing choice was based on HUD's definition of impediments as actions, omissions, or decisions that restrict housing choice due to protected class status or actions, omissions, or decisions that have this effect. The identified impediments are supported by evidence uncovered during the Regional AI process, with impediments of higher need being those identified in multiple sources.

These probable impediments in the entirety of the Northeast Ohio Region are presented in **Volumes I and II** of the Regional AI. They are accompanied by suggested actions that jurisdictions in the Region may implement in order to alleviate or eliminate these impediments, and are accompanied by measurable objectives. The goal of these actions and measurable objectives is to assist these agencies in offering greater housing choice for all citizens of the Northeast Ohio Region.

The following list presents the private and public sector impediments found in the Cleveland Housing Market Area.

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.

IMPEDIMENTS MATRIX

The matrix on the following page includes the impediment, data source, or sources that indicated its existence, protected classes most affected, and ranking of need for action. Level of need for action was determined based on the number of data sources that identified each impediment.

Table 8.I.1
Impediments Matrix
 8. Cleveland Housing Market Area
 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 ³⁹			
Private Sector													
1	Denial of available housing units in the rental markets		X				X	X				Black and Hispanic persons	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				All	L
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		Disabled persons, families	L
6	Lack of inclusionary policies							X		X		All	M

³⁹ 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.

9. WOOSTER HOUSING MARKET AREA

A. CENSUS BUREAU DATA

This section contains additional data from the U.S. Census Bureau.

Table 9.A.1

Population by Age

9. Wooster Housing Market Area
2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Under 5	7,822	7.0%	7,791	6.8%	-.4%
5 to 19	26,456	23.7%	24,990	21.8%	-5.5%
20 to 24	7,278	6.5%	7,437	6.5%	2.2%
25 to 34	13,568	12.2%	12,750	11.1%	-6.0%
35 to 54	32,736	29.3%	30,481	26.6%	-6.9%
55 to 64	10,077	9.0%	14,384	12.6%	42.7%
65 or Older	13,627	12.2%	16,687	14.6%	22.5%
Total	111,564	100.0%	114,520	100.0%	2.6%

Table 9.A.2

Elderly Population by Age

9. Wooster Housing Market Area
2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
65 to 66	1,499	11.0%	2,065	12.4%	37.8%
67 to 69	2,327	17.1%	2,972	17.8%	27.7%
70 to 74	3,470	25.5%	3,957	23.7%	14.0%
75 to 79	2,811	20.6%	3,098	18.6%	10.2%
80 to 84	1,913	14.0%	2,338	14.0%	22.2%
85 or Older	1,607	11.8%	2,257	13.5%	40.4%
Total	13,627	100.0%	16,687	100.0%	22.5%

Table 9.A.3

Population by Race and Ethnicity

9. Wooster Housing Market Area
2000 & 2010 Census SF1 Data

Race	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
White	107,677	96.5%	109,543	95.7%	1.7%
Black	1,749	1.6%	1,712	1.5%	-2.1%
American Indian	183	.2%	183	.2%	.0%
Asian	740	.7%	874	.8%	18.1%
Native Hawaiian/ Pacific Islander	15	.0%	26	.0%	73.3%
Other	264	.2%	567	.5%	114.8%
Two or More Races	936	.8%	1,615	1.4%	72.5%
Total	111,564	100.0%	114,520	100.0%	2.6%
Non-Hispanic	110,727	99.2	112,720	98.4%	1.8%
Hispanic	837	.8%	1,800	1.6%	115.1%

Table 9.A.4**Disability by Age**9. Wooster Housing Market Area
2010 Three-Year ACS Data

Age	Male		Female		Total	
	Disabled Population	Disability Rate	Disabled Population	Disability Rate	Disabled Population	Disability Rate
Under 5	0	.0%	23	.6%	23	.3%
5 to 17	700	6.5%	470	4.4%	1,170	5.5%
18 to 34	604	4.9%	391	3.4%	995	4.2%
35 to 64	2,625	12.0%	3,067	13.5%	5,692	12.7%
65 to 74	916	22.1%	1,084	23.8%	2,000	23.0%
75 or Older	1,518	53.5%	1,992	48.6%	3,510	50.6%
Total	6,363	11.4%	7,027	12.2%	13,390	11.8%

Table 9.A.5**Employment Status by Disability and Type: Age 18 to 64**9. Wooster Housing Market Area
2010 Three-Year ACS Data

Disability Status	Population
Employed:	51,831
With a disability:	3,071
With a hearing difficulty	951
With a vision difficulty	223
With a cognitive difficulty	1,007
With an ambulatory difficulty	1,160
With a self-care difficulty	229
With an independent living difficulty	511
No disability	48,760
Unemployed:	3,717
With a disability:	341
With a hearing difficulty	100
With a vision difficulty	41
With a cognitive difficulty	144
With an ambulatory difficulty	112
With a self-care difficulty	44
With an independent living difficulty	40
No disability	3,376
Not in labor force:	13,015
With a disability:	3,275
With a hearing difficulty	408
With a vision difficulty	403
With a cognitive difficulty	1,417
With an ambulatory difficulty	1,872
With a self-care difficulty	428
With an independent living difficulty	1,193
No disability	9,740
Total	68,563

Table 9.A.6**Households by Income**

9. Wooster Housing Market Area
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	5,114	12.6%	4,605	10.9%
\$15,000 to \$19,999	2,431	6.0%	2,396	5.7%
\$20,000 to \$24,999	2,988	7.4%	2,533	6.0%
\$25,000 to \$34,999	6,221	15.4%	5,189	12.2%
\$35,000 to \$49,999	7,910	19.5%	7,226	17.0%
\$50,000 to \$74,999	9,110	22.5%	8,946	21.1%
\$75,000 to \$99,999	3,756	9.3%	5,598	13.2%
\$100,000 or More	2,956	7.3%	5,902	13.9%
Total	40,486	100.0%	42,395	100.0%

Table 9.A.7**Poverty by Age**

9. Wooster Housing Market Area
2000 Census SF3 & 2010 Five-Year ACS Data

Age	2000 Census		2010 Five-Year ACS	
	Persons in Poverty	% of Total	Persons in Poverty	% of Total
Under 6	1,154	13.3%	1,641	14.9%
6 to 17	2,147	24.7%	2,688	24.3%
18 to 64	4,530	52.1%	5,752	52.1%
65 or Older	867	10.0%	963	8.7%
Total	8,698	100.0%	11,044	100.0%
Poverty Rate	8.0%	.	9.9%	.

Table 9.A.8**Households by Year Home Built**

9. Wooster Housing Market Area
2000 Census SF3 & 2010 Five-Year ACS Data

Year Built	2000 Census		2010 Five-Year ACS	
	Households	% of Total	Households	% of Total
1939 or Earlier	9,539	23.6%	9,343	22.0%
1940 to 1949	2,123	5.2%	1,860	4.4%
1950 to 1959	4,832	11.9%	4,405	10.4%
1960 to 1969	4,998	12.4%	4,395	10.4%
1970 to 1979	7,307	18.1%	7,741	18.3%
1980 to 1989	4,602	11.4%	4,207	9.9%
1990 to 1999	7,044	17.4%	6,294	14.8%
2000 to 2004	.	.	3,143	7.4%
2005 or Later	.	.	1,007	2.4%
Total	40,445	100.0%	42,395	100.0%

Table 9.A.9**Housing Units by Type**9. Wooster Housing Market Area
2000 Census SF3 & 2010 Five-Year ACS Data

Unit Type	2000 Census		2010 Five-Year ACS	
	Units	% of Total	Units	% of Total
Single-Family	30,857	72.9%	34,723	76.0%
Duplex	2,940	6.9%	2,841	6.2%
Tri- or Four-Plex	1,695	4.0%	1,368	3.0%
Apartment	2,873	6.8%	3,127	6.8%
Mobile Home	3,959	9.4%	3,637	8.0%
Boat, RV, Van, Etc.	0	.0%	0	.0%
Total	42,324	100.0%	45,696	100.0%

Table 9.A.10**Housing Units by Tenure**9. Wooster Housing Market Area
2000 & 2010 Census SF1 Data

Tenure	2000 Census		2010 Census		% Change 00–10
	Units	% of Total	Units	% of Total	
Occupied Housing Units	40,445	95.6%	42,638	93.0%	5.4%
Owner-Occupied	29,660	73.3%	31,120	73.0%	4.9%
Renter-Occupied	10,785	26.7%	11,518	27.0%	6.8%
Vacant Housing Units	1,879	4.4%	3,209	7.0%	70.8%
Total Housing Units	42,324	100.0%	45,847	100.0%	8.3%

Table 9.A.11**Disposition of Vacant Housing Units**9. Wooster Housing Market Area
2000 & 2010 Census SF1 Data

Disposition	2000 Census		2010 Census		% Change 00–10
	Units	% of Total	Units	% of Total	
For Rent	707	37.6%	1,224	38.1%	73.1%
For Sale	347	18.5%	572	17.8%	64.8%
Rented or Sold, Not Occupied	237	12.6%	196	6.1%	-17.3%
For Seasonal, Recreational, or Occasional Use	129	6.9%	244	7.6%	89.1%
For Migrant Workers	3	0.2%	3	.1%	.0%
Other Vacant	456	24.3%	970	30.2%	112.7%
Total	1,879	100.0%	3,209	100.0%	70.8%

Table 9.A.12**Households by Household Size**9. Wooster Housing Market Area
2000 & 2010 Census SF1 Data

Size	2000 Census		2010 Census		% Change 00–10
	Households	% of Total	Households	% of Total	
One Person	9,190	22.7%	10,689	25.1%	16.3%
Two Persons	13,899	34.4%	15,079	35.4%	8.5%
Three Persons	6,632	16.4%	6,562	15.4%	-1.1%
Four Persons	6,134	15.2%	5,521	12.9%	-10.0%
Five Persons	2,751	6.8%	2,550	6.0%	-7.3%
Six Persons	986	2.4%	1,160	2.7%	17.6%
Seven Persons or More	853	2.1%	1,077	2.5%	26.3%
Total	40,445	100.0%	42,638	100.0%	5.4%

Table 9.A.13

Household Type by Tenure
9. Wooster Housing Market Area
2000 & 2010 Census SF1 Data

Household Type	2000 Census		2010 Census		% Change 00–10
	Households	% of Total	Households	% of Total	
Family Households	29,488	72.9%	30,070	70.5%	2.0%
Married-Couple Family	24,600	83.4%	24,329	80.9%	-1.1%
Owner-Occupied	20,937	85.1%	20,937	86.1%	.0%
Renter-Occupied	3,663	14.9%	3,392	13.9%	-7.4%
Other Family	4,888	16.6%	5,741	19.1%	17.5%
Male Householder, No Spouse	1,367	28.0%	1,803	31.4%	31.9%
Owner-Occupied	842	61.6%	1,092	60.6%	29.7%
Renter-Occupied	525	38.4%	711	39.4%	35.4%
Female Householder, No Spouse	3,521	72.0%	3,938	68.6%	11.8%
Owner-Occupied	1,878	53.3%	1,960	49.8%	4.4%
Renter-Occupied	1,643	46.7%	1,978	50.2%	20.4%
Non-Family Households	10,957	27.1%	12,568	29.5%	14.7%
Owner-Occupied	6,003	54.8%	7,131	56.7%	18.8%
Renter-Occupied	4,954	45.2%	5,437	43.3%	9.7%
Total	40,445	100.0%	42,638	100.0%	5.4%

Table 9.A.14

Group Quarters Population
9. Wooster Housing Market Area
2000 & 2010 Census SF1 Data

Group Quarters Type	2000 Census		2010 Census		% Change 00-10
	Population	% of Total	Population	% of Total	
Institutionalized					
Correctional Institutions	154	12.0%	118	10.5%	-23.4%
Juvenile Facilities	.	.	81	7.2%	.
Nursing Homes	1,040	80.9%	924	82.3%	-11.2%
Other Institutions	91	7.1%	0	.0%	-100.0%
Total	1,285	100.0%	1,123	100.0%	-12.6%
Noninstitutionalized					
College Dormitories	1,498	75.8%	1,918	91.0%	28.0%
Military Quarters	0	.0%	0	.0%	%
Other Noninstitutional	478	24.2%	190	9.0%	-60.3%
Total	1,976	60.6%	2,108	65.2%	6.7%
Total Group Quarters Population	3,261	100.0%	3,231	100.0%	-.9%

Table 9.A.15

Overcrowding and Severe Overcrowding
9. Wooster Housing Market Area
2000 Census SF3 & 2010 Five-Year ACS Data

Data Source	No Overcrowding		Overcrowding		Severe Overcrowding		Total
	Households	% of Total	Households	% of Total	Households	% of Total	
Owner							
2000 Census	29,128	98.2%	414	1.4%	111	.4%	29,653
2010 ACS	31,482	98.2%	534	1.7%	56	.2%	32,072
Renter							
2000 Census	10,479	97.1%	197	1.8%	116	1.1%	10,792
2010 ACS	10,135	98.2%	152	1.5%	36	.3%	10,323
Total							
2000 Census	39,607	97.9%	611	1.5%	227	.6%	40,445
2010 ACS	41,617	98.2%	686	1.6%	92	.2%	42,395

Table 9.A.16
Households with Incomplete Plumbing Facilities
 9. Wooster Housing Market Area
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Plumbing Facilities	40,095	42,009
Lacking Complete Plumbing Facilities	350	386
Total Households	40,445	42,395
Percent Lacking	.9%	.9%

Table 9.A.17
Households with Incomplete Kitchen Facilities
 9. Wooster Housing Market Area
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Kitchen Facilities	40,010	41,770
Lacking Complete Kitchen Facilities	435	625
Total Households	40,445	42,395
Percent Lacking	1.1%	1.5%

Table 9.A.18
Cost Burden and Severe Cost Burden by Tenure
 9. Wooster Housing Market Area
 2000 Census & 2010 Five-Year ACS Data

2000 Census & 2010 Five-Year ACS Data									
Data Source	Less Than 30%		31%-50%		Above 50%		Not Computed		Total
	Households	% of Total	Households	% of Total	Households	% of Total	Households	% of Total	
Owner With a Mortgage									
2000 Census	11,969	80.0%	2,150	14.4%	818	5.5%	31	.2%	14,968
2010 ACS	14,363	70.6%	4,140	20.3%	1,791	8.8%	50	.2%	20,344
Owner Without a Mortgage									
2000 Census	7,222	92.2%	307	3.9%	199	2.5%	103	1.3%	7,831
2010 ACS	10,125	86.3%	1,066	9.1%	430	3.7%	107	.9%	11,728
Renter									
2000 Census	6,594	64.7%	1,694	16.6%	1,189	11.7%	717	7.0%	10,194
2010 ACS	5,538	53.6%	2,300	22.3%	1,653	16.0%	832	8.1%	10,323
Total									
2000 Census	25,785	78.2%	4,151	12.6%	2,206	6.7%	851	2.6%	32,993
2010 ACS	30,026	70.8%	7,506	17.7%	3,874	9.1%	989	2.3%	42,395

Table 9.A.19
Median Housing Costs
 9. Wooster Housing Market Area
 2000 Census SF3 & 2010 Five-Year ACS Data

Housing Cost	2000 Census	2010 ACS
Median Contract Rent	\$403	\$489
Median Home Value	\$108,100	\$136,800

B. BEA DATA

This section contains additional Bureau of Economic Analysis (BEA) data that address employment and income.

Table 9.B.1
Employment by Industry
 9. Wooster Housing Market Area
 Select Years 2001–2010 BEA Data

NAICS Categories	2001	2005	2006	2007	2008	2009	2010	% Change 01–10
Farm employment	2,670	2,285	2,289	2,320	2,121	2,158	2,132	-20.1%
Forestry, fishing, related activities, and other	178	220	224	246	246	242	247	38.8%
Mining	741	734	795	901	1,093	1,029	1,031	39.1%
Utilities	(D) ⁴⁰	(D)	(D)	(D)	(D)	(D)	71	%
Construction	3,546	3,987	3,829	3,765	3,560	3,197	3,001	-15.4%
Manufacturing	15,710	14,629	14,270	13,022	12,718	11,377	11,412	-27.4%
Wholesale trade	2,047	1,866	1,985	2,072	2,068	2,028	2,010	-1.8%
Retail trade	6,475	6,614	6,559	6,383	6,257	5,844	5,733	-11.5%
Transportation and warehousing	(D)	(D)	(D)	(D)	(D)	(D)	1,793	%
Information	447	447	463	444	463	452	362	-19.0%
Finance and insurance	1,822	1,801	1,825	1,923	1,948	2,052	2,135	17.2%
Real estate and rental and leasing	1,232	1,558	1,561	1,524	1,533	1,476	1,446	17.4%
Professional and technical services	1,963	1,779	1,744	2,171	2,268	2,160	2,210	12.6%
Management of companies and enterprises	427	577	482	496	551	529	523	22.5%
Administrative and waste services	2,118	2,322	2,301	2,368	2,044	1,691	1,670	-21.2%
Educational services	1,478	(D)	(D)	(D)	(D)	(D)	(D)	%
Health care and social assistance	4,271	(D)	(D)	(D)	(D)	(D)	(D)	%
Arts, entertainment, and recreation	556	573	629	663	739	660	683	22.8%
Accommodation and food services	3,368	3,464	3,437	3,329	3,250	3,082	3,006	-10.7%
Other services, except public administration	2,818	3,095	3,082	3,099	2,884	2,836	2,833	.5%
Government and government enterprises	7,733	7,853	7,532	7,420	7,398	7,381	7,377	-4.6%
Total	61,483	62,078	61,300	60,656	59,818	56,933	56,609	-7.9%

⁴⁰ (D): These data are not shown to avoid disclosure of confidential information, but estimates are included in the totals.

Table 9.B.2
Real Earnings by Industry
 9. Wooster Housing Market Area
 Select Years 2001–2010 BEA Data, Real 2011 Dollars

NAICS Categories	2001	2005	2006	2007	2008	2009	2010	% Change 00–10
Farm earnings	63,168	46,867	35,311	45,662	36,189	31,142	34,485	-45.4%
Forestry, fishing, related activities, and other	11,330	6,235	6,473	7,604	7,757	7,185	6,959	-38.6%
Mining	26,428	54,448	57,174	50,039	72,960	34,253	32,108	21.5%
Utilities	(D) ⁴¹	(D)	(D)	(D)	(D)	(D)	6,681	.
Construction	180,944	211,266	200,974	181,299	164,194	143,170	136,716	-24.4%
Manufacturing	915,214	910,094	885,164	796,107	785,141	686,429	777,719	-15.0%
Wholesale trade	104,505	94,563	98,485	119,424	120,524	113,496	112,006	7.2%
Retail trade	169,389	163,811	161,158	156,563	156,213	144,520	145,527	-14.1%
Transportation and warehousing	(D)	(D)	(D)	(D)	(D)	(D)	70,879	.
Information	22,158	25,546	26,114	23,817	20,146	19,818	15,216	-31.3%
Finance and insurance	81,043	96,292	90,528	93,689	85,054	83,033	81,343	.4%
Real estate and rental and leasing	30,428	25,724	29,620	23,570	23,082	20,511	23,536	-22.7%
Professional and technical services	79,691	68,931	64,039	85,130	91,687	85,013	93,887	17.8%
Management of companies and enterprises	24,517	36,361	34,656	34,745	34,872	34,345	29,264	19.4%
Administrative and waste services	31,995	46,614	48,296	44,939	40,932	35,843	33,583	5.0%
Educational services	40,719	(D)	(D)	(D)	(D)	(D)	(D)	.
Health care and social assistance	163,611	(D)	(D)	(D)	(D)	(D)	(D)	.
Arts, entertainment, and recreation	7,441	6,307	7,034	6,909	7,158	6,519	6,108	-17.9%
Accommodation and food services	48,641	51,837	48,843	49,551	48,409	46,153	47,251	-2.9%
Other services, except public administration	85,716	96,859	99,470	98,736	91,614	89,211	93,504	9.1%
Government and government enterprises	361,373	377,977	364,673	355,511	367,125	378,594	380,202	5.2%
Total	2,544,967	2,646,800	2,581,609	2,492,278	2,475,092	2,277,414	2,371,421	-6.8%

⁴¹ (D): These data are not shown to avoid disclosure of confidential information, but estimates are included in the totals.

Table 9.B.3
Real Earnings Per Job by Industry
 9. Wooster Housing Market Area
 Select Years 2001–2010 BEA Data, 1,000's of Real 2011 Dollars

NAICS Categories	2001	2005	2006	2007	2008	2009	2010	% Change 00–10
Farm earnings	23,659	20,511	15,427	19,682	17,062	14,431	16,175	-31.6%
Forestry, fishing, related activities, and other	63,653	28,340	28,899	30,909	31,533	29,691	28,176	-55.7%
Mining	35,665	74,180	71,917	55,537	66,752	33,288	31,143	-12.7%
Utilities	(D) ⁴²	(D)	(D)	(D)	(D)	(D)	94,093	.
Construction	51,028	52,989	52,487	48,154	46,122	44,783	45,557	-10.7%
Manufacturing	58,257	62,212	62,030	61,136	61,735	60,335	68,149	17.0%
Wholesale trade	51,053	50,677	49,614	57,637	58,280	55,965	55,724	9.2%
Retail trade	26,160	24,767	24,571	24,528	24,966	24,730	25,384	-3.0%
Transportation and warehousing	(D)	(D)	(D)	(D)	(D)	(D)	39,531	.
Information	49,571	57,150	56,401	53,642	43,513	43,845	42,033	-15.2%
Finance and insurance	44,480	53,466	49,604	48,720	43,662	40,465	38,100	-14.3%
Real estate and rental and leasing	24,698	16,511	18,975	15,466	15,057	13,896	16,277	-34.1%
Professional and technical services	40,597	38,747	36,719	39,213	40,426	39,358	42,483	4.6%
Management of companies and enterprises	57,417	63,017	71,900	70,049	63,289	64,925	55,953	-2.5%
Administrative and waste services	15,106	20,075	20,989	18,978	20,025	21,197	20,109	33.1%
Educational services	27,550	(D)	(D)	(D)	(D)	(D)	(D)	.
Health care and social assistance	38,307	(D)	(D)	(D)	(D)	(D)	(D)	.
Arts, entertainment, and recreation	13,382	11,008	11,182	10,420	9,686	9,877	8,942	-33.2%
Accommodation and food services	14,442	14,964	14,211	14,885	14,895	14,975	15,719	8.8%
Other services, except public administration	30,417	31,295	32,274	31,860	31,766	31,457	33,005	8.5%
Government and government enterprises	46,731	48,132	48,417	47,913	49,625	51,293	51,539	10.3%
Average	41,393	42,637	42,114	41,089	41,377	40,002	41,891	1.20%

⁴² (D): These data are not shown to avoid disclosure of confidential information, but estimates are included in the totals.

Table 9.B.4
Total Employment and Real Personal Income
 9. Wooster Housing Market Area
 1969–2010 BEA Data, 2011 Dollars

Year	1,000s of 2011 Dollars						Per Capita Income	Total Employment	Real Average Earnings Per Job
	Earnings	Social Security Contributions	Residents Adjustments	Dividends, Interest, Rents	Transfer Payments	Personal Income			
1969	1,186,287	73,148	114,013	197,101	92,394	1,516,647	17,637	37,213	31,878
1970	1,196,341	72,857	109,919	204,220	101,484	1,539,107	17,623	37,521	31,885
1971	1,246,598	78,218	107,678	210,863	113,396	1,600,318	18,103	37,608	33,147
1972	1,310,938	86,068	117,792	218,523	121,088	1,682,273	18,786	38,558	33,999
1973	1,414,994	108,220	123,965	230,618	136,907	1,798,264	19,827	40,453	34,979
1974	1,398,943	110,572	130,522	238,420	150,435	1,807,748	19,854	41,297	33,875
1975	1,299,580	99,386	128,976	239,414	184,204	1,752,788	18,507	39,769	32,678
1976	1,414,145	109,455	129,600	244,237	188,474	1,867,002	19,859	41,258	34,276
1977	1,482,076	118,879	142,359	259,470	189,536	1,954,563	20,766	43,358	34,182
1978	1,590,657	130,645	154,651	281,133	190,301	2,086,098	21,838	45,235	35,164
1979	1,620,655	139,772	163,302	304,129	200,583	2,148,897	22,088	46,053	35,191
1980	1,572,414	137,643	146,396	347,877	226,954	2,155,999	22,112	46,251	33,997
1981	1,579,576	148,571	123,110	395,261	241,307	2,190,682	22,429	46,318	34,103
1982	1,534,418	146,115	98,368	406,891	271,609	2,165,171	22,085	45,645	33,616
1983	1,531,654	152,467	90,035	438,701	284,445	2,192,367	22,327	45,668	33,539
1984	1,708,492	171,477	78,330	468,146	284,607	2,368,098	24,083	47,885	35,679
1985	1,702,208	174,467	76,346	487,768	298,214	2,390,069	24,279	48,627	35,005
1986	1,733,611	183,590	71,523	504,779	311,082	2,437,405	24,781	49,588	34,960
1987	1,828,101	193,119	58,219	497,115	314,859	2,505,175	25,294	50,779	36,001
1988	1,909,176	208,707	50,144	540,025	316,439	2,607,076	25,704	51,941	36,757
1989	1,906,280	208,816	48,735	575,445	323,624	2,645,269	26,149	52,679	36,187
1990	1,957,266	218,861	36,175	552,642	337,923	2,665,146	26,195	53,855	36,343
1991	1,913,520	219,723	38,861	546,822	354,489	2,633,969	25,691	53,912	35,493
1992	2,008,519	227,791	42,042	536,737	395,210	2,754,718	26,573	53,033	37,873
1993	2,114,120	244,312	34,543	545,859	390,381	2,840,590	27,072	55,733	37,933
1994	2,222,946	258,643	34,167	573,676	429,045	3,001,191	28,308	57,645	38,563
1995	2,277,113	266,937	30,682	587,786	425,734	3,054,378	28,454	60,289	37,770
1996	2,289,088	263,366	43,190	608,051	437,341	3,114,304	28,668	61,279	37,355
1997	2,365,872	264,731	43,234	644,079	451,194	3,239,648	29,565	62,303	37,974
1998	2,460,551	263,830	52,766	690,609	461,120	3,401,217	30,832	60,459	40,698
1999	2,479,399	266,976	54,093	687,124	467,921	3,421,561	30,772	61,151	40,546
2000	2,471,357	257,638	64,254	692,776	494,737	3,465,485	31,034	61,959	39,887
2001	2,544,967	267,577	38,578	652,671	528,472	3,497,111	31,179	61,483	41,393
2002	2,591,588	266,602	31,902	569,597	552,837	3,479,323	30,877	61,235	42,322
2003	2,644,914	275,694	35,920	510,447	570,796	3,486,383	30,835	61,443	43,047
2004	2,711,871	288,038	43,107	555,253	579,332	3,601,524	31,804	61,608	44,018
2005	2,646,800	281,905	63,040	540,700	586,389	3,555,025	31,293	62,078	42,637
2006	2,581,609	280,110	74,253	578,761	598,192	3,552,706	31,092	61,300	42,114
2007	2,492,278	272,585	95,977	643,577	623,994	3,583,241	31,370	60,656	41,089
2008	2,475,092	277,297	92,904	709,644	664,642	3,664,984	31,978	59,818	41,377
2009	2,277,414	261,430	86,202	554,903	751,316	3,408,404	29,745	56,933	40,002
2010	2,371,421	268,625	77,530	557,077	767,221	3,504,624	30,606	56,609	41,891

C. BLS DATA

This section contains Bureau of Labor Statistics (BLS) data that address employment and income.

Table 9.C.1
Labor Force Statistics
 9. Wooster Housing Market Area
 1990–2011 BLS Data

Year	Labor Force	Employment	Unemployment	Unemployment Rate	Statewide Unemployment Rate
1990	52,250	49,733	2,517	4.8%	5.7%
1991	52,010	49,008	3,002	5.8%	6.6%
1992	52,064	48,738	3,326	6.4%	7.4%
1993	53,723	51,120	2,603	4.8%	6.7%
1994	54,499	52,403	2,096	3.8%	5.6%
1995	56,747	54,729	2,018	3.6%	4.9%
1996	57,091	54,564	2,527	4.4%	5.0%
1997	57,370	54,899	2,471	4.3%	4.6%
1998	56,511	54,613	1,898	3.4%	4.3%
1999	57,225	55,178	2,047	3.6%	4.3%
2000	58,932	56,971	1,961	3.3%	4.0%
2001	59,674	57,364	2,310	3.9%	4.4%
2002	59,757	56,815	2,942	4.9%	5.7%
2003	59,973	56,922	3,051	5.1%	6.2%
2004	60,132	56,950	3,182	5.3%	6.1%
2005	60,871	57,897	2,974	4.9%	5.9%
2006	59,853	57,125	2,728	4.6%	5.4%
2007	59,590	56,729	2,861	4.8%	5.6%
2008	59,015	55,674	3,341	5.7%	6.5%
2009	58,064	52,366	5,698	9.8%	10.1%
2010	57,560	52,170	5,390	9.4%	10.0%
2011	56,561	52,180	4,381	7.7%	8.6%

D. HMDA DATA

The Home Mortgage Disclosure Act (HMDA) requires both depository and non-depository lenders to collect and publicly disclose information about housing-related loans and loan applications.⁴³ The information presented in this section presents detailed HMDA data, including denial rates and predatory lending including high annual percentage rate (APR) loans.

Table 9.D.1

Purpose of Loan by Year

9. Wooster Housing Market Area
2004–2011 HMDA Data

Purpose	2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	2,805	2,897	2,735	2,185	1,508	1,304	1,263	1,327	16,024
Home Improvement	615	708	604	573	416	212	152	159	3,439
Refinancing	5,929	5,307	4,541	3,361	2,223	3,034	2,464	2,523	29,382
Total	9,349	8,912	7,880	6,119	4,147	4,550	3,879	4,009	48,845

Table 9.D.2

Occupancy Status for Home Purchase Loan Applications

9. Wooster Housing Market Area
2004–2011 HMDA Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	Total
Owner-Occupied	2,532	2,645	2,462	1,973	1,404	1,220	1,200	1,242	14,678
Not Owner-Occupied	233	216	235	181	91	75	55	74	1,160
Not Applicable	40	36	38	31	13	9	8	11	186
Total	2,805	2,897	2,735	2,185	1,508	1,304	1,263	1,327	16,024

Table 9.D.3

Owner-Occupied Home Purchase Loan Applications by Loan Type

9. Wooster Housing Market Area
2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Conventional	2,222	2,352	2,139	1,613	830	541	489	562	10,748
FHA - Insured	228	228	246	250	413	475	460	374	2,674
VA - Guaranteed	49	42	42	35	41	53	51	62	375
Rural Housing Service or Farm Service Agency	33	23	35	75	120	151	200	244	881
Total	2,532	2,645	2,462	1,973	1,404	1,220	1,200	1,242	14,678

⁴³ Data are considered “raw” because they contain entry errors and incomplete loan applications. Starting in 2004, the HMDA data made substantive changes in reporting. It modified the way it handled Hispanic data, loan interest rates, and the reporting of multifamily loan applications.

DENIAL RATES

Table 9.D.4
Loan Applications by Action Taken
 9. Wooster Housing Market Area
 2004–2011 HMDA Data

Action	2004	2005	2006	2007	2008	2009	2010	2011	Total
Loan Originated	1,363	1,486	1,376	1,128	804	635	605	570	7,967
Application Approved but not Accepted	159	131	111	92	45	20	29	31	618
Application Denied	313	313	287	253	136	116	124	119	1,661
Application Withdrawn by Applicant	162	256	154	83	81	44	70	79	929
File Closed for Incompleteness	51	33	27	27	3	11	13	7	172
Loan Purchased by the Institution	484	423	506	390	334	394	359	436	3,326
Preapproval Request Denied	0	3	1	0	1	0	0	0	5
Preapproval Approved but not Accepted	0	0	0	0	0	0	0	0	0
Total	2,532	2,645	2,462	1,973	1,404	1,220	1,200	1,242	14,678
Denial Rate	18.7%	17.4%	17.3%	18.3%	14.5%	15.4%	17.0%	17.3%	17.3%

Table 9.D.5
Denial Rates by Gender of Applicant
 9. Wooster Housing Market Area
 2004–2011 HMDA Data

Year	Male	Female	Not Available	Not Applicable	Average
2004	17.3%	21.9%	26.5%	%	18.7%
2005	15.7%	22.5%	20.0%	.0%	17.4%
2006	15.2%	21.8%	28.8%	%	17.3%
2007	16.1%	22.4%	50.0%	.0%	18.3%
2008	13.5%	15.4%	34.8%	.0%	14.5%
2009	15.0%	14.9%	28.0%	%	15.4%
2010	16.9%	15.9%	29.2%	.0%	17.0%
2011	14.4%	21.7%	36.4%	.0%	17.3%
Average	15.7%	20.4%	30.0%	.0%	17.3%

Table 9.D.6
Loan Applications by Selected Action Taken by Gender of Applicant
 9. Wooster Housing Market Area
 2004–2011 HMDA Data

Gender		2004	2005	2006	2007	2008	2009	2010	2011	Total
Male	Originated	1,021	1,112	1,017	862	579	480	439	405	5,915
	Denied	214	207	182	165	90	85	89	68	1,100
	Denial Rate	17.3%	15.7%	15.2%	16.1%	13.5%	15.0%	16.9%	14.4%	15.7%
Female	Originated	306	320	322	249	209	137	148	141	1,832
	Denied	86	93	90	72	38	24	28	39	470
	Denial Rate	21.9%	22.5%	21.8%	22.4%	15.4%	14.9%	15.9%	21.7%	20.4%
Not Available	Originated	36	52	37	16	15	18	17	21	212
	Denied	13	13	15	16	8	7	7	12	91
	Denial Rate	26.5%	20.0%	28.8%	50.0%	34.8%	28.0%	29.2%	36.4%	30.0%
Not Applicable	Originated	0	2	0	1	1	0	1	3	8
	Denied	0	0	0	0	0	0	0	0	0
	Denial Rate	%	.0%	%	.0%	.0%	%	.0%	.0%	.0%
Total	Originated	1,363	1,486	1,376	1,128	804	635	605	570	7,967
	Denied	313	313	287	253	136	116	124	119	1,661
	Denial Rate	18.7%	17.4%	17.3%	18.3%	14.5%	15.4%	17.0%	17.3%	17.3%

Table 9.D.7
Denial Rates by Race/Ethnicity of Applicant
 9. Wooster Housing Market Area
 2004–2011 HMDA Data

Race/Ethnicity	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	33.3%	66.7%	50.0%	22.2%	.0%	.0%	.0%	25.0%	23.1%
Asian	15.4%	16.7%	23.1%	.0%	30.0%	30.0%	20.0%	.0%	18.7%
Black	28.6%	27.3%	45.2%	44.4%	30.0%	22.2%	42.9%	.0%	35.1%
White	17.6%	16.1%	15.9%	17.4%	13.5%	15.1%	16.4%	16.6%	16.2%
Not Available	32.7%	28.1%	27.5%	41.7%	29.3%	23.1%	30.8%	32.5%	30.4%
Not Applicable	50.0%	.0%	%	.0%	.0%	0%	0.0%	.0%	11.1%
Average	18.7%	17.4%	17.3%	18.3%	14.5%	15.4%	17.0%	17.3%	17.3%
Non-Hispanic	17.8%	16.2%	16.3%	17.2%	13.9%	15.4%	16.3%	16.2%	16.3%
Hispanic	25.0%	38.1%	44.4%	18.8%	20.0%	20.0%	33.3%	42.9%	30.6%

Table 9.D.8
Loan Applications by Selected Action Taken by Race/Ethnicity of Applicant
 9. Wooster Housing Market Area
 2004–2011 HMDA Data

Race		2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Originated	6	1	4	7	4	10	5	3	40
	Denied	3	2	4	2	0	0	0	1	12
	Denial Rate	33.3%	66.7%	50.0%	22.2%	.0%	.0%	.0%	25.0%	23.1%
Asian	Originated	11	10	10	6	7	7	4	6	61
	Denied	2	2	3	0	3	3	1	0	14
	Denial Rate	15.4%	16.7%	23.1%	.0%	30.0%	30.0%	20.0%	.0%	18.7%
Black	Originated	10	8	17	5	7	7	4	3	61
	Denied	4	3	14	4	3	2	3	0	33
	Denial Rate	28.6%	27.3%	45.2%	44.4%	30.0%	22.2%	42.9%	.0%	35.1%
White	Originated	1,269	1,345	1,279	1,081	756	591	573	529	7,423
	Denied	271	259	241	227	118	105	112	105	1,438
	Denial Rate	17.6%	16.1%	15.9%	17.4%	13.5%	15.1%	16.4%	16.6%	16.2%
Not Available	Originated	66	120	66	28	29	20	18	27	374
	Denied	32	47	25	20	12	6	8	13	163
	Denial Rate	32.7%	28.1%	27.5%	41.7%	29.3%	23.1%	30.8%	32.5%	30.4%
Not Applicable	Originated	1	2	0	1	1	0	1	2	8
	Denied	1	0	0	0	0	0	0	0	1
	Denial Rate	32.7%	28.1%	27.5%	41.7%	29.3%	23.1%	30.8%	32.5%	11.1%
Total	Originated	1,363	1,486	1,376	1,128	804	635	605	570	7,967
	Denied	313	313	287	253	136	116	124	119	1,661
	Denial Rate	18.7%	17.4%	17.3%	18.3%	14.5%	15.4%	17.0%	17.3%	17.3%
Non-Hispanic	Originated	1,186	1,347	1,301	1,085	765	594	572	529	7,379
	Denied	256	260	253	226	123	108	111	102	1,439
	Denial Rate	17.8%	16.2%	16.3%	17.2%	13.9%	15.4%	16.3%	16.2%	16.3%
Hispanic	Originated	9	13	10	13	12	8	6	4	75
	Denied	3	8	8	3	3	2	3	3	33
	Denial Rate	25.0%	38.1%	44.4%	18.8%	20.0%	20.0%	33.3%	42.9%	30.6%

Table 9.D.9
Loan Applications by Reason for Denial
 9. Wooster Housing Market Area
 2004–2011 HMDA Data

Denial Reason	2004	2005	2006	2007	2008	2009	2010	2011	Total
Debt-to-Income Ratio	49	50	50	40	27	23	25	20	284
Employment History	6	0	4	4	3	1	11	1	30
Credit History	74	100	64	59	40	35	34	32	438
Collateral	29	36	24	34	21	24	22	18	208
Insufficient Cash	1	6	4	4	0	3	2	3	23
Unverifiable Information	2	4	6	5	2	2	2	3	26
Credit Application Incomplete	17	18	24	14	6	6	5	9	99
Mortgage Insurance Denied	0	0	1	0	2	3	1	2	9
Other	46	48	43	23	8	3	10	6	187
Missing	89	51	67	70	27	16	12	25	357
Total	313	313	287	253	136	116	124	119	1,661

Table 9.D.10
Denial Rates by Income of Applicant
 9. Wooster Housing Market Area
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	55.0%	60.7%	75.0%	55.6%	80.0%	69.2%	83.3%	57.1%	64.4%
\$15,001–\$30,000	28.2%	30.5%	32.8%	33.6%	22.4%	21.1%	24.2%	29.2%	28.8%
\$30,001–\$45,000	17.6%	19.1%	17.2%	18.0%	15.8%	17.2%	16.7%	18.3%	17.6%
\$45,001–\$60,000	17.6%	12.7%	15.5%	15.0%	12.7%	13.4%	17.9%	12.5%	14.8%
\$60,001–\$75,000	14.1%	9.8%	9.6%	14.2%	12.6%	8.2%	14.8%	10.2%	11.8%
Above \$75,000	9.7%	10.8%	10.2%	12.1%	7.8%	9.9%	7.2%	13.4%	10.3%
Data Missing	28.9%	10.8%	14.0%	17.4%	.0%	28.6%	26.7%	33.3%	19.1%
Total	18.7%	17.4%	17.3%	18.3%	14.5%	15.4%	17.0%	17.3%	17.3%

Table 9.D.11
Denial Rates of Loans by Race/Ethnicity and Income of Applicant
 9. Wooster Housing Market Area
 2004–2011 HMDA Data

Race	<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	Above \$75K	Data Missing	Average
American Indian	100.0%	22.2%	44.4%	.0%	.0%	22.7%	%	23.1%
Asian	%	10.0%	23.5%	14.3%	22.2%	17.9%	25.0%	18.7%
Black	%	55.6%	32.1%	44.0%	18.2%	10.0%	.0%	35.1%
White	60.4%	27.9%	16.2%	13.6%	11.3%	9.4%	18.8%	16.2%
Not Available	91.7%	42.0%	40.3%	26.9%	18.8%	17.6%	26.7%	30.4%
Not Applicable	%	50.0%	.0%	%	.0%	.0%	.0%	11.1%
Average	64.4%	28.8%	17.6%	14.8%	11.8%	10.3%	19.1%	17.3%
Non-Hispanic Ethnicity	60.4%	27.8%	16.5%	13.6%	11.3%	9.5%	17.8%	16.3%
Hispanic (Ethnicity)	100.0%	38.1%	21.7%	30.8%	28.6%	27.3%	%	30.6%

Table 9.D.12
Loan Applications by Reason for Denial by Race/Ethnicity of Applicant
 9. Wooster Housing Market Area
 2004–2011 HMDA Data

Denial Reason	American Indian	Asian	Black	White	Not Available	Not Applicable	Total	Hispanic (Ethnicity)
Debt-to-Income Ratio	4	1	6	254	19	0	284	3
Employment History	0	1	0	28	1	0	30	1
Credit History	4	4	11	379	40	0	438	7
Collateral	0	2	2	186	18	0	208	5
Insufficient Cash	0	0	0	21	2	0	23	0
Unverifiable Information	0	1	1	20	4	0	26	0
Credit Application Incomplete	0	1	1	88	9	0	99	0
Mortgage Insurance Denied	0	0	0	8	1	0	9	2
Other	2	2	4	158	20	1	187	4
Missing	2	2	8	296	49	0	357	11
Total	12	14	33	1,438	163	1	1,661	33
% Missing	16.7%	14.3%	24.2%	20.6%	30.1%	.0%	21.5%	33.3%

Table 9.D.13
Loan Applications by Income of Applicant: Originated and Denied
 9. Wooster Housing Market Area
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Loan Originated	9	11	4	4	1	4	1	3	37
	Application Denied	11	17	12	5	4	9	5	4	67
	Denial Rate	55.0%	60.7%	75.0%	55.6%	80.0%	69.2%	83.3%	57.1%	64.4%
\$15,001–\$30,000	Loan Originated	232	207	168	142	114	97	100	80	1,140
	Application Denied	91	91	82	72	33	26	32	33	460
	Denial Rate	28.2%	30.5%	32.8%	33.6%	22.4%	21.1%	24.2%	29.2%	28.8%
\$30,001–\$45,000	Loan Originated	383	399	355	296	239	169	175	156	2,172
	Application Denied	82	94	74	65	45	35	35	35	465
	Denial Rate	17.6%	19.1%	17.2%	18.0%	15.8%	17.2%	16.7%	18.3%	17.6%
\$45,001–\$60,000	Loan Originated	280	337	322	260	178	136	115	112	1,740
	Application Denied	60	49	59	46	26	21	25	16	302
	Denial Rate	17.6%	12.7%	15.5%	15.0%	12.7%	13.4%	17.9%	12.5%	14.8%
\$60,001–\$75,000	Loan Originated	176	202	198	182	90	78	75	88	1,089
	Application Denied	29	22	21	30	13	7	13	10	145
	Denial Rate	14.1%	9.8%	9.6%	14.2%	12.6%	8.2%	14.8%	10.2%	11.8%
Above \$75,000	Loan Originated	251	297	292	225	177	146	128	129	1,645
	Application Denied	27	36	33	31	15	16	10	20	188
	Denial Rate	9.7%	10.8%	10.2%	12.1%	7.8%	9.9%	7.2%	13.4%	10.3%
Data Missing	Loan Originated	32	33	37	19	5	5	11	2	144
	Application Denied	13	4	6	4	0	2	4	1	34
	Denial Rate	28.9%	10.8%	14.0%	17.4%	.0%	28.6%	26.7%	33.3%	19.1%
Total	Loan Originated	1,363	1,486	1,376	1,128	804	635	605	570	7,967
	Application Denied	313	313	287	253	136	116	124	119	1,661
	Denial Rate	18.7%	17.4%	17.3%	18.3%	14.5%	15.4%	17.0%	17.3%	17.3%

Table 9.D.14
Loan Applications by Income and Race/Ethnicity of Applicant: Originated and Denied
 9. Wooster Housing Market Area
 2004–2011 HMDA Data

Race		<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	> \$75K	Data Missing	Total
American Indian	Loan Originated	0	7	5	6	5	17	0	40
	Application Denied	1	2	4	0	0	5	0	12
	Denial Rate	100.0%	22.2%	44.4%	.0%	.0%	22.7%	%	23.1%
Asian	Loan Originated	0	9	13	6	7	23	3	61
	Application Denied	0	1	4	1	2	5	1	14
	Denial Rate	%	10.0%	23.5%	14.3%	22.2%	17.9%	25.0%	18.7%
Black	Loan Originated	0	8	19	14	9	9	2	61
	Application Denied	0	10	9	11	2	1	0	33
	Denial Rate	%	55.6%	32.1%	44.0%	18.2%	10.0%	.0%	35.1%
White	Loan Originated	36	1,075	2,060	1,616	1,015	1,496	125	7,423
	Application Denied	55	417	398	254	129	156	29	1,438
	Denial Rate	60.4%	27.9%	16.2%	13.6%	11.3%	9.4%	18.8%	16.2%
Not Available	Loan Originated	1	40	74	98	52	98	11	374
	Application Denied	11	29	50	36	12	21	4	163
	Denial Rate	91.7%	42.0%	40.3%	26.9%	18.8%	17.6%	26.7%	30.4%
Not Applicable	Loan Originated	0	1	1	0	1	2	3	8
	Application Denied	0	1	0	0	0	0	0	1
	Denial Rate	%	50.0%	.0%	%	.0%	.0%	.0%	11.1%
Total	Loan Originated	37	1,140	2,172	1,740	1,089	1,645	144	7,967
	Application Denied	67	460	465	302	145	188	34	1,661
	Denial Rate	64.4%	28.8%	17.6%	14.8%	11.8%	10.3%	19.1%	17.3%
Non-Hispanic Ethnicity	Loan Originated	36	1,074	2,040	1,608	1,012	1,480	129	7,379
	Application Denied	55	413	404	254	129	156	28	1,439
	Denial Rate	60.4%	27.8%	16.5%	13.6%	11.3%	9.5%	17.8%	16.3%
Hispanic (Ethnicity)	Loan Originated	0	13	18	18	10	16	0	75
	Application Denied	2	8	5	8	4	6	0	33
	Denial Rate	100.0%	38.1%	21.7%	30.8%	28.6%	27.3%	%	30.6%

PREDATORY LENDING

Table 9.D.15
Originated Owner-Occupied Loans by HAL Status
 9. Wooster Housing Market Area
 2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Other	1,173	1,218	1,139	998	732	598	586	560	7,004
HAL	190	268	237	130	72	37	19	10	963
Total	1,363	1,486	1,376	1,128	804	635	605	570	7,967
Percent HAL	13.9%	18.0%	17.2%	11.5%	9.0%	5.8%	3.1%	1.8%	12.1%

Table 9.D.16
Loans by Loan Purpose by HAL Status
 9. Wooster Housing Market Area
 2004–2011 HMDA Data

Loan Purpose		2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	Other	1,173	1,218	1,139	998	732	598	586	560	7,004
	HAL	190	268	237	130	72	37	19	10	963
	Percent HAL	13.9%	18.0%	17.2%	11.5%	9.0%	5.8%	3.1%	1.8%	12.1%
Home Improvement	Other	151	148	169	136	111	43	47	53	858
	HAL	61	81	55	52	17	14	6	6	292
	Percent HAL	28.8%	35.4%	24.6%	27.7%	13.3%	24.6%	11.3%	10.2%	25.4%
Refinancing	Other	1,649	1,238	940	813	653	1,322	1,236	1,208	9,059
	HAL	360	436	438	240	125	79	17	9	1,704
	Percent HAL	17.9%	26.0%	31.8%	22.8%	16.1%	5.6%	1.4%	.7%	15.8%
Total	Other	2,973	2,604	2,248	1,947	1,496	1,963	1,869	1,821	16,921
	HAL	611	785	730	422	72	37	19	10	2,959
	Percent HAL	17.0%	23.2%	24.5%	17.8%	12.5%	6.2%	2.2%	1.4%	14.9%

Table 9.D.17
HALs Originated by Race of Borrower
 9. Wooster Housing Market Area
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	3	0	2	0	0	0	0	0	5
Asian	2	1	3	0	0	0	0	0	6
Black	0	4	2	0	1	1	0	0	8
White	159	208	204	126	71	35	18	9	830
Not Available	26	55	26	4	0	1	0	1	113
Not Applicable	0	0	0	0	0	0	1	0	1
Total	190	268	237	130	72	37	19	10	963
Hispanic (Ethnicity)	2	5	2	2	0	1	0	0	12

Table 9.D.18
Rate of HALs Originated by Race/Ethnicity of Borrower
 9. Wooster Housing Market Area
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	50.0%	.0%	50.0%	.0%	.0%	.0%	.0%	.0%	12.5%
Asian	18.2%	10.0%	30.0%	.0%	.0%	.0%	.0%	.0%	9.8%
Black	.0%	50.0%	11.8%	.0%	14.3%	14.3%	.0%	.0%	13.1%
White	12.5%	15.5%	15.9%	11.7%	9.4%	5.9%	3.1%	1.7%	11.2%
Not Available	39.4%	45.8%	39.4%	14.3%	.0%	5.0%	.0%	3.7%	30.2%
Not Applicable	.0%	.0%	%	.0%	.0%	%	100.0%	.0%	13%
Average	13.9%	18.0%	17.2%	11.5%	9.0%	5.8%	03.1%	01.8%	12.1%
Non-Hispanic Ethnicity	13.4%	15.5%	16.1%	11.6%	9.4%	6.1%	3.0%	1.7%	11.4%
Hispanic (Ethnicity)	22.2%	38.5%	20.0%	15.4%	.0%	12.5%	.0%	.0%	16.0%

Table 9.D.19
Loans by HAL Status by Race/Ethnicity of Borrower
 9. Wooster Housing Market Area
 2004–2011 HMDA Data

Race	Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Other	3	1	2	7	4	10	5	3	35
	HAL	3	0	2	0	0	0	0	0	5
	Percent HAL	50.0%	.0%	50.0%	.0%	.0%	.0%	.0%	.0%	12.5%
Asian	Other	9	9	7	6	7	7	4	6	55
	HAL	2	1	3	0	0	0	0	0	6
	Percent HAL	18.2%	10.0%	30.0%	.0%	.0%	.0%	.0%	.0%	9.8%
Black	Other	10	4	15	5	6	6	4	3	53
	HAL	0	4	2	0	1	1	0	0	8
	Percent HAL	.0%	50.0%	11.8%	.0%	14.3%	14.3%	.0%	.0%	13.1%
White	Other	1,110	1,137	1,075	955	685	556	555	520	6,593
	HAL	159	208	204	126	71	35	18	9	830
	Percent HAL	12.5%	15.5%	15.9%	11.7%	9.4%	5.9%	03.1%	01.7%	11.2%
Not Available	Other	40	65	40	24	29	19	18	26	261
	HAL	26	55	26	4	0	1	0	1	113
	Percent HAL	39.4%	45.8%	39.4%	14.3%	.0%	5.0%	.0%	3.7%	30.2%
Not Applicable	Other	1	2	0	1	1	0	0	0	7
	HAL	0	0	0	0	0	0	1	0	1
	Percent HAL	.0%	.0%	%	.0%	.0%	%	100.0%	.0%	13.0%
Total	Other	1,173	1,218	1,139	998	732	598	586	560	7,004
	HAL	190	268	237	130	72	37	19	10	963
	Percent HAL	13.9%	18.0%	17.2%	11.5%	9.0%	5.8%	3.1%	1.8%	12.1%
Non-Hispanic Ethnicity	Other	1,027	1,138	1,091	959	693	558	555	520	6,541
	HAL	159	209	210	126	72	36	17	9	838
	Percent HAL	13.4%	15.5%	16.1%	11.6%	9.4%	6.1%	3.0%	1.7%	11.4%
Hispanic (Ethnicity)	Other	7	8	8	11	12	7	6	4	63
	HAL	2	5	2	2	0	1	0	0	12
	Percent HAL	22.2%	38.5%	20.0%	15.4%	.0%	12.5%	.0%	.0%	16.0%

Table 9.D.20
Rates of HALs by Income of Borrower
 9. Wooster Housing Market Area
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Average
\$15,000 or Below	11.1%	18.2%	.0%	50.0%	100.0%	25.0%	.0%	.0%	18.9%
\$15,001–\$30,000	22.4%	25.6%	23.2%	19.0%	14.9%	11.3%	7.0%	7.5%	18.6%
\$30,001–\$45,000	13.8%	17.8%	19.4%	13.5%	10.9%	4.7%	5.1%	.6%	12.8%
\$45,001–\$60,000	11.4%	21.4%	16.8%	9.2%	7.9%	3.7%	.9%	.9%	11.7%
\$60,001–\$75,000	16.5%	18.3%	13.1%	9.3%	5.6%	10.3%	.0%	2.3%	11.4%
Above \$75,000	7.2%	9.1%	13.0%	8.4%	5.1%	2.7%	01.6%	.0%	7.1%
Data Missing	15.6%	18.2%	29.7%	5.3%	.0%	.0%	.0%	.0%	16.0%
Average	13.9%	18.0%	17.2%	11.5%	9.0%	5.8%	3.1%	1.8%	12.1%

Table 9.D.21
Loans by HAL Status by Income of Borrower
 9. Wooster Housing Market Area
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Other	8	9	4	2	0	3	1	3	30
	HAL	1	2	0	2	1	1	0	0	7
	Percent HAL	11.1%	18.2%	.0%	50.0%	100.0%	25.0%	.0%	.0%	18.9%
\$15,001–\$30,000	Other	180	154	129	115	97	86	93	74	928
	HAL	52	53	39	27	17	11	7	6	212
	Percent HAL	22.4%	25.6%	23.2%	19.0%	14.9%	11.3%	7.0%	7.5%	18.6%
\$30,001–\$45,000	Other	330	328	286	256	213	161	166	155	1,895
	HAL	53	71	69	40	26	8	9	1	277
	Percent HAL	13.8%	17.8%	19.4%	13.5%	10.9%	4.7%	5.1%	.6%	12.8%
\$45,001–\$60,000	Other	248	265	268	236	164	131	114	111	1,537
	HAL	32	72	54	24	14	5	1	1	203
	Percent HAL	11.4%	21.4%	16.8%	9.2%	7.9%	3.7%	.9%	.9%	11.7%
\$60,001–\$75,000	Other	147	165	172	165	85	70	75	86	965
	HAL	29	37	26	17	5	8	0	2	124
	Percent HAL	16.5%	18.3%	13.1%	9.3%	5.6%	10.3%	.0%	2.3%	11.4%
Above \$75,000	Other	233	270	254	206	168	142	126	129	1,528
	HAL	18	27	38	19	9	4	2	0	117
	Percent HAL	7.2%	9.1%	13.0%	8.4%	5.1%	2.7%	1.6%	.0%	7.1%
Data Missing	Other	27	27	26	18	5	5	11	2	121
	HAL	5	6	11	1	0	0	0	0	23
	Percent HAL	15.6%	18.2%	29.7%	5.3%	.0%	.0%	.0%	.0%	16.0%
Total	Other	1,173	1,218	1,139	998	732	598	586	560	7,004
	HAL	190	268	237	130	72	37	19	10	963
	Percent HAL	13.9%	18.0%	17.2%	11.5%	9.0%	5.8%	3.1%	1.8%	12.1%

E. CRA DATA

Additional data tables related to Community Reinvestment Act (CRA) data are presented in this section.

Table 9.E.1
Small Business Loans Originated: \$100,000 or Less by Tract MFI
 9. Wooster Housing Market Area
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000		82	1,087	320		1,489
2001		96	1,217	496		1,809
2002		136	1,712	697		2,545
2003		95	2,032	293		2,420
2004		49	2,044	405		2,498
2005		66	2,051	478		2,595
2006		51	2,178	569		2,798
2007		52	2,459	607		3,118
2008		44	1,841	449		2,334
2009		21	813	187		1,021
2010		17	802	197		1,016
2011		21	1,057	239		1,317
Total	0	730	19,293	4,937	0	24,960
Loan Amount (\$1,000s)						
2000		1,761	12,701	4,601		19,063
2001		2,010	17,768	6,164		25,942
2002		2,794	19,082	7,231		29,107
2003		801	25,158	2,823		28,782
2004		396	24,806	4,858		30,060
2005		636	25,830	5,927		32,393
2006		513	26,036	5,546		32,095
2007		450	27,679	6,477		34,606
2008		491	18,230	3,733		22,454
2009		123	9,726	2,329		12,178
2010		152	12,797	2,838		15,787
2011		329	18,211	3,922		22,462
Total	0	10,456	238,024	56,449	0	304,929

Table 9.E.2
Small Business Loans Originated: \$100,001 to \$250,000 by Tract MFI
 9. Wooster Housing Market Area
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000		5	47	14		66
2001		2	77	29		108
2002		15	79	23		117
2003		6	100	6		112
2004		3	108	11		122
2005		4	74	8		86
2006		1	53	8		62
2007		1	50	7		58
2008		0	42	5		47
2009		0	23	6		29
2010		3	66	10		79
2011		0	47	7		54
Total	0	40	766	134	0	940
Loan Amount (\$1,000s)						
2000		806	7,766	2,352		10,924
2001		450	13,037	4,967		18,454
2002		2,434	13,807	4,121		20,362
2003		928	17,574	1,114		19,616
2004		626	19,503	1,768		21,897
2005		752	12,645	1,237		14,634
2006		200	8,649	1,418		10,267
2007		240	8,016	1,257		9,513
2008		0	7,036	830		7,866
2009		0	4,132	1,053		5,185
2010		450	11,171	1,940		13,561
2011		0	8,380	1,132		9,512
Total	0	6,886	131,716	23,189	0	161,791

Table 9.E.3
Small Business Loans Originated: More than \$250,000 by Tract MFI
 9. Wooster Housing Market Area
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000		2	35	11		48
2001		5	66	42		113
2002		10	83	38		131
2003		3	109	7		119
2004		1	109	4		114
2005		2	87	6		95
2006		1	71	7		79
2007		1	54	2		57
2008		3	46	4		53
2009		1	28	2		31
2010		2	81	10		93
2011		3	53	10		66
Total	0	34	822	143	0	999
Loan Amount (\$1,000s)						
2000		946	19,145	5,243		25,334
2001		2,145	35,336	22,597		60,078
2002		4,115	42,378	21,215		67,708
2003		1,253	57,973	2,745		61,971
2004		527	59,996	1,550		62,073
2005		850	45,566	2,619		49,035
2006		600	37,717	2,482		40,799
2007		500	28,950	1,060		30,510
2008		1,374	26,073	1,929		29,376
2009		500	17,580	764		18,844
2010		1,250	48,452	5,496		55,198
2011		1,833	30,159	5,196		37,188
Total	0	15,893	449,325	72,896	0	538,114

Table 9.E.4
Small Business Loans to Businesses with Gross Annual Revenues of Less Than \$1 Million by Tract MFI
 9. Wooster Housing Market Area
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000		63	542	159		764
2001		55	690	254		999
2002		67	512	195		774
2003		41	842	109		992
2004		18	814	181		1,013
2005		33	987	238		1,258
2006		14	902	247		1,163
2007		20	946	241		1,207
2008		11	645	156		812
2009		6	333	96		435
2010		5	307	84		396
2011		10	477	121		608
Total	0	343	7,997	2,081	0	10,421
Loan Amount (\$1,000s)						
2000		2,713	15,625	7,350		25,688
2001		2,693	35,183	23,022		60,898
2002		3,445	31,669	16,850		51,964
2003		1,302	33,285	2,669		37,256
2004		593	35,760	4,593		40,946
2005		756	26,964	4,749		32,469
2006		1,019	22,544	4,763		28,326
2007		435	22,417	4,123		26,975
2008		446	17,072	2,799		20,317
2009		48	10,005	2,350		12,403
2010		44	17,122	4,819		21,985
2011		764	16,760	4,529		22,053
Total	0	14,258	284,406	82,616	0	381,280

F. COMPLAINT DATA

This section contains data regarding fair housing complaints, as provided by the U.S. Department of Housing and Urban Development (HUD), the Ohio Civil Rights Commission (OCRC), and the Fair Housing Contact Service (FHCS).

HUD COMPLAINTS

Table 9.F.1
Fair Housing Complaints by Basis
9. Wooster Housing Market Area
2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color						2				2
Disability		3	5	1	1		1	1		12
Family Status	2		2	1	1				1	7
National Origin						3				3
Race	1	1	1		3	3		3		12
Religion		2								2
Sex		1		1					1	3
Total Bases	3	7	8	3	5	8	1	4	2	41
Total Complaints	3	5	7	2	3	4	1	4	1	30

Table 9.F.2
Fair Housing Complaints by Issue
9. Wooster Housing Market Area
2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Discrimination in terms, conditions or privileges relating to rental			1	2	1	1	2		1	9
Discriminatory refusal to rent		2	1			1	2		1	7
Discriminatory terms, conditions, privileges, or services and facilities			1	2				2		5
Failure to make reasonable accommodation			1	1	1		1	1		5
Discriminatory advertising, statements, and notices						1		2	1	4
Other discriminatory acts			1	1		1				3
Discriminatory refusal to rent and negotiate for rental					1	1				2
Discriminatory acts under Section 818 (coercion, etc.)					1			1		2
Discriminatory refusal to negotiate for rental					1					1
False denial or representation of availability - rental					1					1
Discriminatory financing (includes real estate transactions)	1									1
Discrimination in services and facilities relating to rental				1						1
Otherwise deny or make housing available					1					1
Failure to provide accessible and usable public and common user areas				1						1
Total Issues	3	5	8	7	3	6	1	7	3	43
Total Complaints	3	5	7	2	3	4	1	4	1	30

Table 9.F.3
Fair Housing Complaints by Closure Status
 9. Wooster Housing Market Area
 2004–2012 HUD Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Administrative Closure Cause (FHAP)	1		1					3		5
Conciliated / Settled	2		1	1						4
No Cause		2	4	1		3	1	1	1	13
		3	1		3	1				8
Total Complaints	3	5	7	2	3	4	1	4	1	30

HUD Complaints Found With Cause

Table 9.F.4
Fair Housing Complaints Found With Cause by Basis
 9. Wooster Housing Market Area
 2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color						1				1
Disability		1	5	1			1	1		9
Family Status	2		1	1					1	5
National Origin						3				3
Race						2				2
Sex		1		1					1	3
Total Bases	2	2	6	3		6	1	1	2	23
Total Complaints	2	2	5	2		3	1	1	1	17

Table 9.F.5
Fair Housing Complaints Found With Cause by Issue
 9. Wooster Housing Market Area
 2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Discriminatory refusal to rent	2					2			1	5
Failure to make reasonable accommodation		1	1	1			1	1		5
Discrimination in terms, conditions or privileges relating to rental				1		1			1	3
Discriminatory refusal to rent and negotiate for rental				1		1				2
Discriminatory advertising, statements, and notices						1			1	2
Discriminatory terms, conditions, privileges, or services and facilities			2							2
Other discriminatory acts		1	1							2
Discriminatory refusal to negotiate for rental				1						1
False denial or representation of availability - rental				1						1
Discrimination in services and facilities relating to rental			1							1
Otherwise deny or make housing available				1						1
Discriminatory acts under Section 818 (coercion, etc.)				1						1
Failure to provide accessible and usable public and common user areas			1							1
Total Issues	2	2	6	7	0	5	1	1	3	27
Total Complaints	2	2	5	2		3	1	1	1	17

OHIO CIVIL RIGHTS COMMISSION COMPLAINTS

Table 9.F.6
Fair Housing Complaints by Basis
 9. Wooster Housing Market Area
 2004–2012 OCRC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color						2				2
Disability		2	4	1			1	1		9
Family Status	2			2	1			1	1	7
Gender		1	1						1	3
National Origin						3				3
Race		1	1		1			1		7
Religion		1								1
Total Bases	2	5	6	3	4	6	1	3	2	32
Total Complaints	2	4	6	3	3	4	1	3	1	27

Table 9.F.7
Fair Housing Complaints by Issue
 9. Wooster Housing Market Area
 2004–2012 OCRC Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Advertising								1		1
Exclusion						1				1
Harassment								1		1
Intimidation						1				1
Other	2	2		1	1				1	7
Reasonable Accommodation			1				1			2
Terms and Conditions		2	5	2	2	4		2		17
Total Issues	2	4	6	3	3	6	1	4	1	30
Total Complaints	2	4	6	3	3	4	1	3	1	27

Table 9.F.8
Fair Housing Complaints by Closure Status
 9. Wooster Housing Market Area
 2004–2012 OCRC Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Administrative Closure								1		1
CP Failed to Cooperate			1							1
CP Withdrawal – No Benefit	2									2
No Cause Finding Issued		3	1		3	1				8
Settlement With Benefits			3				1		1	5
Successful Conciliation			1	1				1		3
Withdrawal With Benefits		1		2		3		1		7
Total Complaints	2	4	6	3	3	4	1	3	1	27

FAIR HOUSING CONTACT SERVICE COMPLAINTS

Table 9.F.9
Fair Housing Complaints by Basis
 9. Wooster Housing Market Area
 2004–2012 FHCS Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability		1			1			1	2	5
Familial Status								3	1	4
National Origin			1			3				4
Race			1					1		2
Sex									1	1
Total Bases	0	1	2	0	1	3	0	5	4	16
Total Complaints		1	1		1	3		4	3	13

Table 9.F.10
Fair Housing Complaints by Closure Status
 9. Wooster Housing Market Area
 2004–2012 FHCS Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Closed			1		1					2
Elected not to pursue									1	1
Independently resolved						3				3
No contact								2	1	3
Probable cause								2		2
Settled									1	1
Missing		1								1
Total Complaints	0	1	1	0	1	3	0	4	3	13

G. FAIR HOUSING SURVEY FOR HOUSING STAKEHOLDERS DATA

This section presents public involvement data gathered through the 2012–2013 Fair Housing Survey for Housing Stakeholders.

Table 9.G.1
Primary Role of Respondent
 9. Wooster Housing Market Area
 2012–2013 Fair Housing Survey for Housing
 Stakeholders Data

Primary Role	Total
Condo or Homeowner Association Leader	1
Real Estate	1
Other Role	1
Total	3

FEDERAL, STATE, AND LOCAL LAWS

Table 9.G.2
Familiarity with Fair Housing Laws

9. Wooster Housing Market Area
2012–2013 Fair Housing Survey
for Housing Stakeholders Data

Familiarity	Total
Not Familiar	0
Somewhat Familiar	1
Very Familiar	1
Missing	1
Total	3

Table 9.G.3
Perceptions About Fair Housing Laws

9. Wooster Housing Market Area
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?	1	1		1	3
Are fair housing laws difficult to understand or follow?	1	1		1	3
Do you think fair housing laws should be changed?	1	1		1	3
Do you think fair housing laws are adequately enforced?	1	1		1	3

Table 9.G.4
Fair Housing Activities

9. Wooster Housing Market Area
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?	1	1		1	3	
Have you participated in fair housing training?	1			2	3	
Are you aware of any fair housing testing?		2		1	3	
Testing and education	Too Little	Right Amount	Too Much	Don't Know	Missing	Total
Is there sufficient outreach and education activity?		1		1	1	3
Is there sufficient testing?		1		1	1	3

Table 9.G.5
Protected Classes

9. Wooster Housing Market Area
2012–2013 Fair Housing Survey
for Housing Stakeholders Data

Protected Class	Total
Family Status	1
Religion	2
Gender	2
National Origin	1
Color	1
Sexual Orientation	1
Ethnicity	1
Other	2
Total	11

Table 9.G.6
Fair Housing Violation
Referrals

9. Wooster Housing Market Area
 2012–2013 Fair Housing Survey
 for Housing Stakeholders Data

Referral	Total
City	1
Lawyer	1
Total	2

LOCAL FAIR HOUSING

Table 9.G.7
Local Fair Housing

9. Wooster Housing Market Area
 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?			1	2	3
Are there any specific geographic areas that have fair housing problems?		1	1	1	3
Are there any specific groups in that face housing discrimination?		1	1	1	3

FAIR HOUSING IN THE PRIVATE SECTOR

Table 9.G.8
Barriers to Fair Housing in the Private Sector

9. Wooster Housing Market Area
 2012–2013 Fair Housing Survey for Housing Stakeholders Data

Question	Yes	No	Don't Know	Missing	Total
Are you aware of any questionable practices or barriers to fair housing choice in:					
The rental housing market?	2		1		3
The real estate industry?	2		1		3
The mortgage and home lending industry?	2		1		3
The housing construction or accessible housing design fields?	2		1		3
The home insurance industry?	2		1		3
The home appraisal industry?	2		1		3
Any other housing services?	2		1		3

FAIR HOUSING IN THE PUBLIC SECTOR

Table 9.G.9
Barriers to Fair Housing in the Public Sector
 9. Wooster Housing Market Area
 2012–2013 Fair Housing Survey for Housing Stakeholders Data

Question	Yes	No	Don't Know	Missing	Total
Are you aware of any questionable practices or barriers to fair housing choice in:					
Land use policies?		2		1	3
Zoning laws?		2		1	3
Occupancy standards or health and safety codes?		2		1	3
Property tax policies?		2		1	3
Permitting process?		2		1	3
Housing construction standards?		2		1	3
Neighborhood or community development policies?		2		1	3
Limited access to government services, such as employment services?		2		1	3
Public administrative actions or regulations?		2		1	3

NARRATIVE COMMENTS

Federal, State, and Local Laws

Table G.9.10
How did you become aware of fair housing laws?

9. Wooster Housing Market Area
 2013 Fair Housing Survey Data

Comments:
Real Estate Association When I read of government (local, county, state, federal) being able to tell the owner who they could rent or sell to.

Table G.9.11
How should fair housing laws be changed?

9. Wooster Housing Market Area
 2013 Fair Housing Survey Data

Comments:
get rid of it. involves government at the expense of liberty. tort law has existed for centuries as remediation.

Local Fair Housing

Table G.9.12
Are there any specific groups in that face housing discrimination?

9. Wooster Housing Market Area
 2013 Fair Housing Survey Data

Comments:
Or, perhaps criminals.

Fair Housing in the Private Sector**Table G.9.13**

Are you aware of any questionable practices or barriers to fair housing choice in the housing construction or accessible housing design fields?

9. Wooster Housing Market Area
2013 Fair Housing Survey Data

Comments:
stupid question - the federal government passed a law against that in the Reagan administration - the full employment act for attorneys.

Fair Housing in the Public Sector**Table G.9.14**

Are you aware of any questionable practices or barriers to fair housing choice in land use policies?

9. Wooster Housing Market Area
2013 Fair Housing Survey Data

Comments:
and why wouldn't a community choose to do that?

Table 9.G.15

Are you aware of any questionable practices or barriers to fair housing choice in zoning laws?

9. Wooster Housing Market Area
2013 Fair Housing Survey Data

Comments:
at what point does someone else's rights supplant mine - especially in regard to property?

Table 9.G.16

Are you aware of any questionable practices or barriers to fair housing choice in occupancy standards or health and safety codes?

9. Wooster Housing Market Area
2013 Fair Housing Survey Data

Comments:
equality under the law!

Table 9.G.17

Are you aware of any questionable practices or barriers to fair housing choice in property tax policies?

9. Wooster Housing Market Area
2013 Fair Housing Survey Data

Comments:
Why?

Table 9.G.18

Are you aware of any questionable practices or barriers to fair housing choice in the permitting process?

9. Wooster Housing Market Area
2013 Fair Housing Survey Data

Comments:
Why?

Table 9.G.19**Are you aware of any questionable practices or barriers to fair housing choice in neighborhood or community development policies?**9. Wooster Housing Market Area
2013 Fair Housing Survey Data

Comments:
Isn't that what zoning does - restrict property rights?

Table 9.G.20**Are you aware of any barriers that limit access to government services, such as a lack of transportation or employment services?**9. Wooster Housing Market Area
2013 Fair Housing Survey Data

Comments:
Is it your position that the government must supply transportation and employment services?

H. LAND USE PLANNING SURVEY DATA

This section contains data regarding the potential effects of local land use and housing policies on fair housing choice, as gathered from the Fair Housing Survey for Government Officials.

FAIR HOUSING SURVEY FOR GOVERNMENT OFFICIALS

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 was conducted predominately online. Respondents were solicited by mass-distributed emails sent by the NEOSCC, members of the Progress Review Team, and other various organizations in the 12-county region.

This section contains data gathered from the public sector staff in the Wooster Housing Market Area that received and completed the survey.⁴⁴

⁴⁴ For areas with both nonentitlement and entitlement communities, the results of the nonentitlement community government official survey and the entitlement community interviews were summed.

Table 9.H.1
Housing Development
 9. Wooster Housing Market Area
 2012 Fair Housing Survey for Government Officials Data

Question: Does your jurisdiction have...	Yes	No	Don't Know	Missing	Total
Housing Development					
Definitions for "dwelling unit" or "residential unit"?	0	0	1	1	2
Guidelines that encourage development affordable housing units?	0	0	0	2	2
Any potential barriers to the development of low- to moderate- income housing?	0	0	0	2	2
Guidelines that allow the development of mixed use housing?	0	0	0	2	2
Any potential barriers to the development of mixed use housing?	0	0	0	2	2
Occupancy Standards					
A definition for the term "family"?	0	0	0	2	2
Residential occupancy standards or limits?	0	0	0	2	2
Special Needs Housing					
A definition for the term "disability"?	0	0	0	2	2
Development standards for making housing accessible to persons with disabilities?	0	0	0	2	2
A process by which persons with disabilities can request modification to the jurisdiction's policies?	0	0	0	2	2
Standards for the development of senior housing?	0	0	0	2	2
Guidelines that distinguish senior citizen housing from other residential uses?	0	0	0	2	2
Guidelines for developing housing for any other special needs populations?	0	0	0	2	2
Fair Housing Policies					
A fair housing ordinance, policy, or regulation?	0	0	1	1	2
Policies or practices for "affirmatively furthering fair housing"?	0	0	0	2	2

I. IMPEDIMENTS

The 2013 Northeast Ohio Regional Analysis of Impediments to Fair Housing Choice uncovered several potential issues regarding fair housing in the Wooster Housing Market Area. Identification of these items as probable impediments to fair housing choice was based on HUD's definition of impediments as actions, omissions, or decisions that restrict housing choice due to protected class status or actions, omissions, or decisions that have this effect. The identified impediments are supported by evidence uncovered during the Regional AI process, with impediments of higher need being those identified in multiple sources.

These probable impediments in the entirety of the Northeast Ohio Region are presented in **Volumes I and II** of the Regional AI. They are accompanied by suggested actions that jurisdictions in the Region may implement in order to alleviate or eliminate these impediments, and are accompanied by measurable objectives. The goal of these actions and measureable objectives is to assist these agencies in offering greater housing choice for all citizens of the Northeast Ohio Region.

The following list presents the private and public sector impediments found in the Wooster Housing Market Area.

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:* 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.

IMPEDIMENTS MATRIX

The matrix on the following page includes the impediment, data source, or sources that indicated its existence, protected classes most affected, and ranking of need for action. Level of need for action was determined based on the number of data sources that identified each impediment.

Table 9.I.1
Impediments Matrix
 9. Wooster Housing Market Area
 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 ⁴⁵		
Private Sector												
1	Denial of available housing units in the rental markets		X				X	X			Black and Hispanic persons	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		Black and Hispanic persons	M
10	Failure to comply with accessibility requirements in construction of housing units							X			Disabled persons	L
Public Sector												
1	Lack of sufficient fair housing policies or practices by several units of local government							X			All	L
2	Lack of sufficient fair housing outreach and education efforts							X	X	X	All	H
3	Land use and planning decisions and operational practices resulting in unequal access to government services such as transportation							X		X	All	M
4	Lack of inclusionary policies							X		X	All	M

⁴⁵ 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.

10. YOUNGSTOWN-WARREN HOUSING MARKET AREA

A. CENSUS BUREAU DATA

This section contains additional data from the U.S. Census Bureau.

Table 10.A.1

Population by Age

10. Youngstown-Warren Housing Market Area
2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00-10
	Population	% of Total	Population	% of Total	
Under 5	29,109	6.0%	24,456	5.4%	-16.0%
5 to 19	99,127	20.5%	85,012	18.9%	-14.2%
20 to 24	26,704	5.5%	25,287	5.6%	-5.3%
25 to 34	57,055	11.8%	48,188	10.7%	-15.5%
35 to 54	142,877	29.6%	122,935	27.4%	-14.0%
55 to 64	46,632	9.7%	63,938	14.2%	37.1%
65 or Older	81,167	16.8%	79,319	17.7%	-2.3%
Total	482,671	100.0%	449,135	100.0%	-6.9%

Table 10.A.2

Elderly Population by Age

10. Youngstown-Warren Housing Market Area
2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00-10
	Population	% of Total	Population	% of Total	
65 to 66	7,950	9.8%	8,749	11.0%	10.1%
67 to 69	12,083	14.9%	12,797	16.1%	5.9%
70 to 74	21,132	26.0%	17,193	21.7%	-18.6%
75 to 79	18,596	22.9%	14,681	18.5%	-21.1%
80 to 84	12,401	15.3%	13,201	16.6%	6.5%
85 or Older	9,005	11.1%	12,698	16.0%	41.0%
Total	81,167	100.0%	79,319	100.0%	-2.3%

Table 10.A.3

Population by Race and Ethnicity

10. Youngstown-Warren Housing Market Area
2000 & 2010 Census SF1 Data

Race	2000 Census		2010 Census		% Change 00-10
	Population	% of Total	Population	% of Total	
White	411,811	85.3%	377,961	84.2%	-8.2%
Black	58,662	12.2%	54,850	12.2%	-6.5%
American Indian	778	.2%	851	.2%	9.4%
Asian	2,234	.5%	2,666	.6%	19.3%
Native Hawaiian/ Pacific Islander	96	.0%	92	.0%	-4.2%
Other	3,128	.6%	4,089	.9%	30.7%
Two or More Races	5,962	1.2%	8,626	1.9%	44.7%
Total	482,671	100.0%	449,135	100.0%	-6.9%
Non-Hispanic	473,237	98.0%	435,198	96.9%	-8.0%
Hispanic	9,434	2.0%	13,937	3.1%	47.7%

Table 10.A.4**Disability by Age**10. Youngstown-Warren Housing Market Area
2010 Three-Year ACS Data

Age	Male		Female		Total	
	Disabled Population	Disability Rate	Disabled Population	Disability Rate	Disabled Population	Disability Rate
Under 5	94	.7%	43	.4%	137	.6%
5 to 17	2,842	7.4%	2,252	6.2%	5,094	6.8%
18 to 34	3,774	9.3%	2,690	6.5%	6,464	7.9%
35 to 64	13,484	15.0%	13,566	14.2%	27,050	14.6%
65 to 74	4,186	24.4%	4,968	24.3%	9,154	24.4%
75 or Older	7,022	48.8%	10,974	47.1%	17,996	47.7%
Total	31,402	14.8%	34,493	15.1%	65,895	14.9%

Table 10.A.5**Employment Status by Disability and Type: Age 18 to 64**10. Youngstown-Warren Housing Market Area
2010 Three-Year ACS Data

Disability Status	Population
Employed:	180,425
With a disability:	10,505
With a hearing difficulty	2,562
With a vision difficulty	1,481
With a cognitive difficulty	3,493
With an ambulatory difficulty	4,391
With a self-care difficulty	1,162
With an independent living difficulty	2,166
No disability	169,920
Unemployed:	21,687
With a disability:	3,113
With a hearing difficulty	729
With a vision difficulty	460
With a cognitive difficulty	1,587
With an ambulatory difficulty	1,152
With a self-care difficulty	401
With an independent living difficulty	880
No disability	18,574
Not in labor force:	65,037
With a disability:	19,896
With a hearing difficulty	2,492
With a vision difficulty	2,052
With a cognitive difficulty	9,962
With an ambulatory difficulty	12,593
With a self-care difficulty	4,652
With an independent living difficulty	8,622
No disability	45,141
Total	267,149

Table 10.A.6**Households by Income**10. Youngstown-Warren Housing Market Area
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	34,669	18.1%	31,056	16.7%
\$15,000 to \$19,999	14,648	7.6%	12,655	6.8%
\$20,000 to \$24,999	14,728	7.7%	13,126	7.1%
\$25,000 to \$34,999	27,070	14.1%	23,088	12.4%
\$35,000 to \$49,999	33,387	17.4%	29,679	16.0%
\$50,000 to \$74,999	36,765	19.2%	35,596	19.2%
\$75,000 to \$99,999	16,576	8.7%	19,404	10.5%
\$100,000 or More	13,767	7.2%	20,883	11.3%
Total	191,610	100.0%	185,487	100.0%

Table 10.A.7**Poverty by Age**10. Youngstown-Warren Housing Market Area
2000 Census SF3 & 2010 Five-Year ACS Data

Age	2000 Census		2010 Five-Year ACS	
	Persons in Poverty	% of Total	Persons in Poverty	% of Total
Under 6	7,586	14.0%	8,882	12.5%
6 to 17	12,508	23.1%	16,578	23.4%
18 to 64	27,692	51.2%	38,661	54.5%
65 or Older	6,330	11.7%	6,868	9.7%
Total	54,116	100.0%	70,989	100.0%
Poverty Rate	11.5%	.	16.0%	.

Table 10.A.8**Households by Year Home Built**10. Youngstown-Warren Housing Market Area
2000 Census SF3 & 2010 Five-Year ACS Data

Year Built	2000 Census		2010 Five-Year ACS	
	Households	% of Total	Households	% of Total
1939 or Earlier	40,203	21.0%	36,186	19.5%
1940 to 1949	21,304	11.1%	17,093	9.2%
1950 to 1959	38,877	20.3%	37,211	20.1%
1960 to 1969	29,138	15.2%	26,447	14.3%
1970 to 1979	31,921	16.7%	29,244	15.8%
1980 to 1989	12,873	6.7%	12,891	6.9%
1990 to 1999	17,291	9.0%	16,521	8.9%
2000 to 2004	.	.	7,556	4.1%
2005 or Later	.	.	2,338	1.3%
Total	191,607	100.0%	185,487	100.0%

Table 10.A.9**Housing Units by Type**10. Youngstown-Warren Housing Market Area
2000 Census SF3 & 2010 Five-Year ACS Data

Unit Type	2000 Census		2010 Five-Year ACS	
	Units	% of Total	Units	% of Total
Single-Family	160,467	77.6%	164,273	78.7%
Duplex	9,337	4.5%	9,008	4.3%
Tri- or Four-Plex	7,463	3.6%	7,373	3.5%
Apartment	22,299	10.8%	21,407	10.3%
Mobile Home	7,281	3.5%	6,619	3.2%
Boat, RV, Van, Etc.	32	.0%	0	.0%
Total	206,879	100.0%	208,680	100.0%

Table 10.A.10**Housing Units by Tenure**10. Youngstown-Warren Housing Market Area
2000 & 2010 Census SF1 Data

Tenure	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
Occupied Housing Units	191,607	92.6%	184,723	88.8%	-3.6%
Owner-Occupied	140,759	73.5%	132,088	71.5%	-6.2%
Renter-Occupied	50,848	26.5%	52,635	28.5%	3.5%
Vacant Housing Units	15,272	7.4%	23,273	11.2%	52.4%
Total Housing Units	206,879	100.0%	207,996	100.0%	.5%

Table 10.A.11**Disposition of Vacant Housing Units**10. Youngstown-Warren Housing Market Area
2000 & 2010 Census SF1 Data

Disposition	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
For Rent	5,686	37.2%	6,887	29.6%	21.1%
For Sale	2,525	16.5%	3,418	14.7%	35.4%
Rented or Sold, Not Occupied	3,766	24.7%	1,135	4.9%	-69.9%
For Seasonal, Recreational, or Occasional Use	1,013	6.6%	1,278	5.5%	26.2%
For Migrant Workers	3	0.0%	3	.0%	.0%
Other Vacant	2,279	14.9%	10,552	45.3%	363.0%
Total	15,272	100.0%	23,273	100.0%	52.4%

Table 10.A.12**Households by Household Size**10. Youngstown-Warren Housing Market Area
2000 & 2010 Census SF1 Data

Size	2000 Census		2010 Census		% Change 00-10
	Households	% of Total	Households	% of Total	
One Person	53,803	28.1%	56,457	30.6%	4.9%
Two Persons	64,004	33.4%	63,513	34.4%	-.8%
Three Persons	31,479	16.4%	28,854	15.6%	-8.3%
Four Persons	25,555	13.3%	21,149	11.4%	-17.2%
Five Persons	11,151	5.8%	9,369	5.1%	-16.0%
Six Persons	3,686	1.9%	3,380	1.8%	-8.3%
Seven Persons or More	1,929	1.0%	2,001	1.1%	3.7%
Total	191,607	100.0%	184,723	100.0%	-3.6%

Table 10.A.13**Household Type by Tenure**10. Youngstown-Warren Housing Market Area
2000 & 2010 Census SF1 Data

Household Type	2000 Census		2010 Census		% Change 00-10
	Households	% of Total	Households	% of Total	
Family Households	130,513	68.1%	119,550	64.7%	-8.4%
Married-Couple Family	97,349	74.6%	83,884	70.2%	-13.8%
Owner-Occupied	86,178	88.5%	74,262	88.5%	-13.8%
Renter-Occupied	11,171	11.5%	9,622	11.5%	-13.9%
Other Family	33,164	25.4%	35,666	29.8%	7.5%
Male Householder, No Spouse	7,581	22.9%	9,045	25.4%	19.3%
Owner-Occupied	5,178	68.3%	5,978	66.1%	15.4%
Renter-Occupied	2,403	31.7%	3,067	33.9%	27.6%
Female Householder, No Spouse	25,583	77.1%	26,621	74.6%	4.1%
Owner-Occupied	14,240	55.7%	13,613	51.1%	-4.4%
Renter-Occupied	11,343	44.3%	13,008	48.9%	14.7%
Non-Family Households	61,094	31.9%	65,173	35.3%	6.7%
Owner-Occupied	35,163	57.6%	38,235	58.7%	8.7%
Renter-Occupied	25,931	42.4%	26,938	41.3%	3.9%
Total	191,607	100.0%	184,723	100.0%	-3.6%

Table 10.A.14**Group Quarters Population**10. Youngstown-Warren Housing Market Area
2000 & 2010 Census SF1 Data

Group Quarters Type	2000 Census		2010 Census		% Change 00-10
	Population	% of Total	Population	% of Total	
Institutionalized					
Correctional Institutions	4,228	46.2%	4,983	54.6%	17.9%
Juvenile Facilities	.	.	101	1.1%	.
Nursing Homes	4,556	49.8%	4,014	44.0%	-11.9%
Other Institutions	370	4.0%	24	.3%	-93.5%
Total	9,154	100.0%	9,122	100.0%	-.3%
Noninstitutionalized					
College Dormitories	856	39.2%	1,283	48.9%	49.9%
Military Quarters	0	.0%	0	.0%	%
Other Noninstitutional	1,325	60.8%	1,341	51.1%	1.2%
Total	2,181	19.2%	2,624	22.3%	20.3%
Total Group Quarters Population	11,335	100.0%	11,746	100.0%	3.6%

Table 10.A.15**Overcrowding and Severe Overcrowding**10. Youngstown-Warren Housing Market Area
2000 Census SF3 & 2010 Five-Year ACS Data

Data Source	No Overcrowding		Overcrowding		Severe Overcrowding		Total
	Households	% of Total	Households	% of Total	Households	% of Total	
Owner							
2000 Census	139,481	99.1%	1,031	.7%	282	.2%	140,794
2010 ACS	135,100	99.3%	921	.7%	61	.0%	136,082
Renter							
2000 Census	49,297	97.0%	1,141	2.2%	375	.7%	50,813
2010 ACS	48,646	98.5%	527	1.1%	232	.5%	49,405
Total							
2000 Census	188,778	98.5%	2,172	1.1%	657	.3%	191,607
2010 ACS	183,746	99.1%	1,448	.8%	293	.2%	185,487

Table 10.A.16**Households with Incomplete Plumbing Facilities**

10. Youngstown-Warren Housing Market Area

2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Plumbing Facilities	190,855	184,884
Lacking Complete Plumbing Facilities	752	603
Total Households	191,607	185,487
Percent Lacking	.4%	.3%

Table 10.A.17**Households with Incomplete Kitchen Facilities**

10. Youngstown-Warren Housing Market Area

2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Kitchen Facilities	190,660	184,065
Lacking Complete Kitchen Facilities	947	1,422
Total Households	191,607	185,487
Percent Lacking	.5%	.8%

Table 10.A.18**Cost Burden and Severe Cost Burden by Tenure**

10. Youngstown-Warren Housing Market Area

2000 Census & 2010 Five-Year ACS Data

Data Source	Less Than 30%		31%-50%		Above 50%		Not Computed		Total
	Households	% of Total	Households	% of Total	Households	% of Total	Households	% of Total	
Owner With a Mortgage									
2000 Census	57,314	77.0%	10,898	14.6%	5,847	7.9%	353	.5%	74,412
2010 ACS	55,995	67.7%	16,237	19.6%	10,116	12.2%	304	.4%	82,652
Owner Without a Mortgage									
2000 Census	44,254	89.2%	2,945	5.9%	1,701	3.4%	710	1.4%	49,610
2010 ACS	45,084	84.4%	5,021	9.4%	2,933	5.5%	392	.7%	53,430
Renter									
2000 Census	28,310	56.5%	8,877	17.7%	8,192	16.3%	4,760	9.5%	50,139
2010 ACS	21,642	43.8%	10,990	22.2%	11,983	24.3%	4,790	9.7%	49,405
Total									
2000 Census	129,878	74.6%	22,720	13.0%	15,740	9.0%	5,823	3.3%	174,161
2010 ACS	122,721	66.2%	32,248	17.4%	25,032	13.5%	5,486	3.0%	185,487

Table 10.A.19**Median Housing Costs**

10. Youngstown-Warren Housing Market Area

2000 Census SF3 & 2010 Five-Year ACS Data

Housing Cost	2000 Census	2010 ACS
Median Contract Rent	\$753	\$910
Median Home Value	\$165,200	\$200,900

B. BEA DATA

This section contains additional Bureau of Economic Analysis (BEA) data that address employment and income.

Table 10.B.1
Employment by Industry
 10. Youngstown-Warren Housing Market Area
 Select Years 2001–2010 BEA Data

NAICS Categories	2001	2005	2006	2007	2008	2009	2010	% Change 01–10
Farm employment	1,955	1,680	1,664	1,670	1,573	1,585	1,576	-19.4%
Forestry, fishing, related activities, and other	125	170	250	279	289	274	281	124.8%
Mining	529	514	1,156	1,261	1,601	1,535	1,633	208.7%
Utilities	755	594	600	622	613	581	536	-29.0%
Construction	13,162	13,417	13,179	13,098	12,536	11,217	10,854	-17.5%
Manufacturing	39,258	32,367	31,297	27,552	26,440	19,842	21,668	-44.8%
Wholesale trade	5,246	8,489	8,465	8,484	8,846	8,165	7,708	46.9%
Retail trade	33,497	31,902	31,212	31,038	29,375	28,289	27,238	-18.7%
Transportation and warehousing	7,925	8,497	8,678	8,753	8,666	7,611	7,886	-.5%
Information	3,256	3,020	3,351	3,352	3,140	2,887	2,352	-27.8%
Finance and insurance	7,769	7,846	7,771	8,065	8,205	8,506	8,668	11.6%
Real estate and rental and leasing	7,186	8,157	8,128	8,194	7,997	7,830	7,589	5.6%
Professional and technical services	8,873	8,525	8,563	8,921	8,484	8,364	8,369	-5.7%
Management of companies and enterprises	1,506	1,543	1,608	1,597	1,832	1,697	1,838	22.0%
Administrative and waste services	14,148	14,624	15,221	15,560	14,887	14,414	16,093	13.7%
Educational services	2,950	3,307	3,151	3,018	3,029	3,148	3,228	9.4%
Health care and social assistance	30,565	32,426	32,658	32,576	32,614	32,813	32,494	6.3%
Arts, entertainment, and recreation	3,502	3,646	3,507	3,502	3,526	3,437	3,484	-.5%
Accommodation and food services	17,239	17,691	17,611	17,583	16,919	16,429	16,585	-3.8%
Other services, except public administration	14,335	13,854	13,636	13,654	13,282	12,916	12,682	-11.5%
Government and government enterprises	29,103	28,478	28,294	28,016	27,966	28,147	27,351	-6.0%
Total	246,725	241,366	240,000	236,795	231,820	219,687	220,113	-10.8%

Table 10.B.2
Real Earnings by Industry

10. Youngstown-Warren Housing Market Area
 Select Years 2001–2010 BEA Data, Real 2011 Dollars

NAICS Categories	2001	2005	2006	2007	2008	2009	2010	% Change 00–10
Farm earnings	11,999	14,032	10,986	13,697	14,081	14,656	13,086	9.1%
Forestry, fishing, related activities, and other	4,524	3,917	4,143	4,704	4,108	3,551	3,541	-21.7%
Mining	5,903	12,922	68,935	64,211	81,905	27,200	28,057	375.3%
Utilities	64,859	58,362	56,993	57,420	65,303	60,908	54,701	-15.7%
Construction	598,242	604,252	601,050	573,389	530,331	469,272	469,780	-21.5%
Manufacturing	2,748,275	2,519,627	2,613,490	2,312,143	1,952,700	1,399,681	1,522,527	-44.6%
Wholesale trade	310,844	504,606	515,722	529,811	579,557	519,546	491,965	58.3%
Retail trade	1,011,721	958,460	909,303	882,714	828,705	806,178	800,004	-20.9%
Transportation and warehousing	381,486	406,154	421,822	405,612	392,683	324,858	346,852	-9.1%
Information	155,768	149,693	156,968	167,294	154,893	139,324	107,936	-30.7%
Finance and insurance	361,310	381,298	378,299	368,895	327,833	311,273	311,285	-13.8%
Real estate and rental and leasing	190,145	155,422	138,616	114,263	129,978	141,946	126,933	-33.2%
Professional and technical services	348,332	343,330	348,476	364,394	391,552	365,675	384,422	10.4%
Management of companies and enterprises	96,076	99,320	104,065	103,286	106,664	111,999	121,353	26.3%
Administrative and waste services	333,792	384,599	407,023	410,283	402,595	401,353	452,136	35.5%
Educational services	51,974	65,492	63,975	62,901	62,375	65,493	67,113	29.1%
Health care and social assistance	1,330,828	1,483,010	1,499,742	1,461,776	1,473,029	1,489,859	1,450,793	9.0%
Arts, entertainment, and recreation	44,679	35,577	34,555	34,689	31,543	31,378	31,498	-29.5%
Accommodation and food services	285,109	303,249	296,924	306,078	301,889	300,208	320,599	12.4%
Other services, except public administration	462,634	446,541	428,462	409,920	358,161	340,517	347,414	-24.9%
Government and government enterprises	1,406,644	1,503,923	1,484,355	1,466,239	1,460,082	1,500,870	1,506,211	7.1%
Total	10,391,116	10,488,316	10,543,903	10,113,718	9,649,965	8,825,746	8,958,206	-13.8%

Table 10.B.3**Real Earnings Per Job by Industry**

10. Youngstown-Warren Housing Market Area
 Select Years 2001–2010 BEA Data, 1,000's of Real 2011 Dollars

NAICS Categories	2001	2005	2006	2007	2008	2009	2010	% Change 00–10
Farm earnings	6,137	8,352	6,602	8,202	8,951	9,246	8,304	35.3%
Forestry, fishing, related activities, and other	36,195	23,039	16,573	16,860	14,215	12,959	12,601	-65.2%
Mining	11,158	25,140	59,632	50,921	51,159	17,720	17,181	54.0%
Utilities	85,906	98,252	94,988	92,314	106,530	104,834	102,054	18.8%
Construction	45,452	45,036	45,607	43,777	42,305	41,836	43,282	-4.8%
Manufacturing	70,005	77,846	83,506	83,919	73,854	70,541	70,266	.4%
Wholesale trade	59,254	59,442	60,924	62,448	65,516	63,631	63,825	7.7%
Retail trade	30,203	30,044	29,133	28,440	28,211	28,498	29,371	-2.8%
Transportation and warehousing	48,137	47,800	48,608	46,340	45,313	42,683	43,983	-8.6%
Information	47,840	49,567	46,842	49,909	49,329	48,259	45,891	-4.1%
Finance and insurance	46,507	48,598	48,681	45,740	39,955	36,595	35,912	-22.8%
Real estate and rental and leasing	26,460	19,054	17,054	13,945	16,253	18,128	16,726	-36.8%
Professional and technical services	39,258	40,273	40,696	40,847	46,152	43,720	45,934	17.0%
Management of companies and enterprises	63,795	64,368	64,717	64,675	58,223	65,998	66,024	3.5%
Administrative and waste services	23,593	26,299	26,741	26,368	27,043	27,845	28,095	19.1%
Educational services	17,618	19,804	20,303	20,842	20,592	20,805	20,791	18.0%
Health care and social assistance	43,541	45,735	45,923	44,873	45,166	45,405	44,648	2.5%
Arts, entertainment, and recreation	12,758	9,758	9,853	9,905	8,946	9,130	9,041	-29.1%
Accommodation and food services	16,539	17,141	16,860	17,408	17,843	18,273	19,331	16.9%
Other services, except public administration	32,273	32,232	31,421	30,022	26,966	26,364	27,394	-15.1%
Government and government enterprises	48,333	52,810	52,462	52,336	52,209	53,323	55,070	13.9%
Average	42,116	43,454	43,933	42,711	41,627	40,174	40,698	-3.37%

Table 10.B.4
Total Employment and Real Personal Income
 10. Youngstown-Warren Housing Market Area
 1969–2010 BEA Data, 2011 Dollars

Year	1,000s of 2011 Dollars						Per Capita Income	Total Employment	Real Average Earnings Per Job
	Earnings	Social Security Contributions	Residents Adjustments	Dividends, Interest, Rents	Transfer Payments	Personal Income			
1969	8,865,743	606,223	-114,219	1,034,572	738,712	9,918,585	18,632	228,317	38,831
1970	8,547,684	577,602	-92,965	1,069,090	837,259	9,783,467	18,183	225,612	37,887
1971	8,636,503	598,155	-117,948	1,094,514	937,928	9,952,842	18,376	224,051	38,547
1972	9,259,646	674,727	-144,771	1,114,456	996,303	10,550,908	19,154	229,677	40,316
1973	10,198,735	863,463	-191,702	1,163,187	1,083,090	11,389,847	21,101	240,712	42,369
1974	10,075,429	882,022	-188,577	1,222,204	1,203,193	11,430,228	20,911	243,890	41,311
1975	9,268,408	793,075	-161,427	1,213,996	1,442,831	10,970,733	20,569	231,260	40,078
1976	9,782,557	841,062	-191,225	1,241,826	1,525,269	11,517,365	21,426	233,288	41,933
1977	10,303,817	888,919	-200,955	1,314,919	1,496,105	12,024,967	22,313	238,465	43,209
1978	10,550,064	942,462	-185,204	1,392,104	1,543,680	12,358,183	22,980	241,633	43,662
1979	10,645,969	988,022	-165,012	1,477,852	1,611,363	12,582,150	23,723	244,569	43,530
1980	9,878,143	904,670	-119,806	1,730,075	1,879,033	12,462,774	23,497	234,394	42,143
1981	9,630,111	947,331	-123,945	1,957,294	1,872,525	12,388,655	23,581	230,072	41,857
1982	8,341,308	829,273	-57,593	2,044,799	2,143,173	11,642,413	22,289	212,618	39,231
1983	8,454,652	859,315	-104,220	2,145,935	2,131,042	11,768,094	22,726	210,046	40,251
1984	9,016,125	943,432	-124,199	2,361,192	2,052,011	12,361,697	24,148	218,107	41,338
1985	9,112,236	973,818	-126,774	2,418,687	2,106,098	12,536,428	24,673	220,834	41,263
1986	9,019,244	992,889	-99,435	2,460,928	2,201,089	12,588,936	25,064	225,729	39,956
1987	8,969,363	990,345	-81,832	2,347,333	2,243,087	12,487,606	25,106	229,710	39,046
1988	9,546,685	1,080,872	-103,882	2,393,382	2,258,391	13,013,703	26,290	235,379	40,559
1989	9,761,183	1,124,483	-109,636	2,560,091	2,327,528	13,414,683	27,145	239,059	40,832
1990	9,472,987	1,117,610	-67,215	2,525,441	2,552,980	13,366,583	27,115	239,324	39,582
1991	9,405,844	1,133,886	-85,369	2,529,041	2,596,055	13,311,685	26,943	238,978	39,359
1992	9,891,852	1,152,796	-181,530	2,449,264	2,747,738	13,754,528	27,734	237,026	41,733
1993	10,142,274	1,205,574	-237,034	2,391,667	2,770,273	13,861,605	27,921	239,845	42,287
1994	10,952,092	1,254,287	-402,293	2,467,167	2,800,045	14,562,725	29,376	244,010	44,884
1995	10,692,275	1,271,875	-249,020	2,537,604	2,879,101	14,588,084	29,533	251,689	42,482
1996	10,270,731	1,256,650	-68,474	2,630,784	2,904,923	14,481,314	29,398	253,418	40,529
1997	10,423,314	1,237,261	-50,038	2,798,356	2,919,781	14,854,153	30,294	255,560	40,786
1998	10,539,576	1,203,519	930	2,943,309	2,925,453	15,205,748	31,156	256,138	41,148
1999	10,738,610	1,220,223	45,492	2,863,503	2,938,192	15,365,574	31,667	256,743	41,826
2000	10,632,791	1,166,695	97,520	2,854,085	3,031,507	15,449,208	32,051	255,334	41,643
2001	10,391,116	1,157,121	133,796	2,717,329	3,206,604	15,291,724	31,907	246,725	42,116
2002	10,517,103	1,134,663	132,568	2,527,862	3,311,503	15,354,373	32,292	242,116	43,438
2003	10,833,616	1,162,081	95,826	2,461,901	3,380,540	15,609,802	33,031	240,716	45,006
2004	10,679,044	1,184,124	123,551	2,273,432	3,415,055	15,306,958	32,612	240,044	44,488
2005	10,488,316	1,175,788	135,767	2,180,032	3,473,382	15,101,709	32,433	241,366	43,454
2006	10,543,903	1,196,868	109,639	2,347,580	3,514,317	15,318,572	33,136	240,000	43,933
2007	10,113,718	1,153,357	135,205	2,631,055	3,595,308	15,321,929	33,472	236,795	42,711
2008	9,649,965	1,129,899	195,221	2,781,536	3,810,182	15,307,006	33,733	231,820	41,627
2009	8,825,746	1,059,695	198,136	2,193,469	4,258,913	14,416,570	31,942	219,687	40,174
2010	8,958,206	1,075,336	159,612	2,201,456	4,332,895	14,576,832	32,517	220,113	40,698

C. BLS DATA

This section contains Bureau of Labor Statistics (BLS) data that address employment and income.

Table 10.C.1
Labor Force Statistics
 10. Youngstown-Warren Housing Market Area
 1990–2011 BLS Data

Year	Labor Force	Employment	Unemployment	Unemployment Rate	Statewide Unemployment Rate
1990	228,179	211,402	16,777	7.4%	5.7%
1991	227,947	211,021	16,926	7.4%	6.6%
1992	232,841	210,367	22,474	9.7%	7.4%
1993	230,509	210,639	19,870	8.6%	6.7%
1994	232,062	213,796	18,266	7.9%	5.6%
1995	233,072	217,823	15,249	6.5%	4.9%
1996	231,432	216,308	15,124	6.5%	5.0%
1997	232,170	218,361	13,809	5.9%	4.6%
1998	231,627	217,310	14,317	6.2%	4.3%
1999	228,662	216,136	12,526	5.5%	4.3%
2000	227,861	216,353	11,508	5.1%	4.0%
2001	225,207	211,790	13,417	6.0%	4.4%
2002	224,447	208,806	15,641	7.0%	5.7%
2003	224,575	207,812	16,763	7.5%	6.2%
2004	224,416	207,663	16,753	7.5%	6.1%
2005	224,503	209,305	15,198	6.8%	5.9%
2006	224,761	210,751	14,010	6.2%	5.4%
2007	221,123	207,400	13,723	6.2%	5.6%
2008	219,851	203,864	15,987	7.3%	6.5%
2009	222,010	193,375	28,635	12.9%	10.1%
2010	218,263	192,990	25,273	11.6%	10.0%
2011	214,644	194,054	20,590	9.6%	8.6%

D. HMDA DATA

The Home Mortgage Disclosure Act (HMDA) requires both depository and non-depository lenders to collect and publicly disclose information about housing-related loans and loan applications.⁴⁶ The information presented in this section presents detailed HMDA data, including denial rates and predatory lending including high annual percentage rate (APR) loans.

Table 10.D.1

Purpose of Loan by Year

10. Youngstown-Warren Housing Market Area
2004–2011 HMDA Data

Purpose	2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	11,570	13,030	12,292	8,510	5,675	4,916	4,391	4,356	64,740
Home Improvement	3,994	4,772	4,078	3,790	2,530	1,442	1,265	1,014	22,885
Refinancing	26,882	26,452	22,813	16,460	11,338	12,579	11,547	9,723	137,794
Total	42,446	44,254	39,183	28,760	19,543	18,937	17,203	15,093	225,419

Table 10.D.2

Occupancy Status for Home Purchase Loan Applications

10. Youngstown-Warren Housing Market Area
2004–2011 HMDA Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	Total
Owner-Occupied	10,381	11,656	11,061	7,636	5,154	4,612	4,143	4,048	58,691
Not Owner-Occupied	1,053	1,241	1,154	794	512	299	241	303	5,597
Not Applicable	136	133	77	80	9	5	7	5	452
Total	11,570	13,030	12,292	8,510	5,675	4,916	4,391	4,356	64,740

Table 10.D.3

Owner-Occupied Home Purchase Loan Applications by Loan Type

10. Youngstown-Warren Housing Market Area
2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Conventional	8,996	10,551	10,145	6,615	2,967	2,098	1,931	1,811	45,114
FHA - Insured	1,162	896	773	864	1,937	2,134	1,898	1,880	11,544
VA - Guaranteed	206	193	138	143	202	225	205	226	1,538
Rural Housing Service or Farm Service Agency	17	16	5	14	48	155	109	131	495
Total	10,381	11,656	11,061	7,636	5,154	4,612	4,143	4,048	58,691

⁴⁶ Data are considered “raw” because they contain entry errors and incomplete loan applications. Starting in 2004, the HMDA data made substantive changes in reporting. It modified the way it handled Hispanic data, loan interest rates, and the reporting of multifamily loan applications.

DENIAL RATES

Table 10.D.4

Loan Applications by Action Taken
10. Youngstown-Warren Housing Market Area
2004–2011 HMDA Data

Action	2004	2005	2006	2007	2008	2009	2010	2011	Total
Loan Originated	6,059	6,480	5,861	4,365	2,960	2,443	2,306	2,129	32,603
Application Approved but not Accepted	806	936	734	456	249	144	145	129	3,599
Application Denied	1,173	1,482	1,682	1,093	681	491	481	470	7,553
Application Withdrawn by Applicant	777	1,022	682	352	228	191	150	157	3,559
File Closed for Incompleteness	143	144	154	114	45	35	25	39	699
Loan Purchased by the Institution	1,423	1,577	1,945	1,249	989	1,308	1,036	1,124	10,651
Preapproval Request Denied	0	15	3	7	2	0	0	0	27
Preapproval Approved but not Accepted	0	0	0	0	0	0	0	0	0
Total	10,381	11,656	11,061	7,636	5,154	4,612	4,143	4,048	58,691
Denial Rate	16.2%	18.6%	22.3%	20.0%	18.7%	16.7%	17.3%	18.1%	18.8%

Table 10.D.5

Denial Rates by Gender of Applicant
10. Youngstown-Warren Housing Market Area
2004–2011 HMDA Data

Year	Male	Female	Not Available	Not Applicable	Average
2004	13.7%	18.3%	49.2%	.0%	16.2%
2005	16.2%	21.9%	34.9%	100.0%	18.6%
2006	19.3%	27.1%	32.0%	.0%	22.3%
2007	17.2%	24.0%	36.4%	%	20.0%
2008	16.8%	21.9%	23.2%	50.0%	18.7%
2009	15.9%	17.5%	22.8%	.0%	16.7%
2010	16.5%	17.8%	25.0%	%	17.3%
2011	17.0%	19.8%	22.3%	%	18.1%
Average	16.5%	21.8%	32.5%	25.0%	18.8%

Table 10.D.6

Loan Applications by Selected Action Taken by Gender of Applicant
10. Youngstown-Warren Housing Market Area
2004–2011 HMDA Data

Gender		2004	2005	2006	2007	2008	2009	2010	2011	Total
Male	Originated	4,264	4,407	3,928	2,985	1,955	1,561	1,537	1,420	22,057
	Denied	677	850	941	621	396	296	303	290	4,374
	Denial Rate	13.7%	16.2%	19.3%	17.2%	16.8%	15.9%	16.5%	17.0%	16.5%
Female	Originated	1,668	1,883	1,688	1,242	868	786	667	580	9,382
	Denied	374	529	627	393	243	167	144	143	2,620
	Denial Rate	18.3%	21.9%	27.1%	24.0%	21.9%	17.5%	17.8%	19.8%	21.8%
Not Available	Originated	126	190	242	138	136	95	102	129	1,158
	Denied	122	102	114	79	41	28	34	37	557
	Denial Rate	49.2%	34.9%	32.0%	36.4%	23.2%	22.8%	25.0%	22.3%	32.5%
Not Applicable	Originated	1	0	3	0	1	1	0	0	6
	Denied	0	1	0	0	1	0	0	0	2
	Denial Rate	.0%	100.0%	.0%	%	50.0%	.0%	%	%	25.0%
Total	Originated	6,059	6,480	5,861	4,365	2,960	2,443	2,306	2,129	32,603
	Denied	1,173	1,482	1,682	1,093	681	491	481	470	7,553
	Denial Rate	16.2%	18.6%	22.3%	20.0%	18.7%	16.7%	17.3%	18.1%	18.8%

Table 10.D.7
Denial Rates by Race/Ethnicity of Applicant
 10. Youngstown-Warren Housing Market Area
 2004–2011 HMDA Data

Race/Ethnicity	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	42.9%	37.5%	25.0%	22.2%	.0%	11.1%	.0%	28.6%	23.6%
Asian	15.2%	11.6%	20.8%	19.5%	33.3%	11.5%	17.4%	33.3%	18.3%
Black	31.1%	28.2%	38.5%	32.9%	36.8%	25.0%	21.6%	32.3%	32.1%
White	12.9%	16.3%	19.3%	17.5%	16.9%	15.7%	16.0%	16.5%	16.4%
Not Available	39.8%	31.1%	36.6%	40.4%	29.3%	27.6%	30.4%	26.8%	34.1%
Not Applicable	40.0%	100.0%	.0%	%	50.0%	0.0%	0%	%	35.3%
Average	16.2%	18.6%	22.3%	20.0%	18.7%	16.7%	17.3%	18.1%	18.8%
Non-Hispanic	14.2%	17.1%	21.0%	18.3%	18.1%	15.9%	15.7%	17.0%	17.4%
Hispanic	22.2%	29.8%	25.7%	30.7%	21.6%	22.9%	25.5%	33.3%	26.6%

Table 10.D.8
Loan Applications by Selected Action Taken by Race/Ethnicity of Applicant
 10. Youngstown-Warren Housing Market Area
 2004–2011 HMDA Data

Race		2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Originated	8	5	9	7	7	8	6	5	55
	Denied	6	3	3	2	0	1	0	2	17
	Denial Rate	42.9%	37.5%	25.0%	22.2%	.0%	.0%	.0%	28.6%	23.6%
Asian	Originated	39	38	38	33	8	23	19	12	210
	Denied	7	5	10	8	4	3	4	6	47
	Denial Rate	15.2%	11.6%	20.8%	19.5%	33.3%	11.5%	17.4%	33.3%	18.3%
Black	Originated	333	427	372	241	117	84	105	67	1,746
	Denied	150	168	233	118	68	28	29	32	826
	Denial Rate	31.1%	28.2%	38.5%	32.9%	36.8%	25.0%	21.6%	32.3%	32.1%
White	Originated	5,352	5,492	5,031	3,873	2,665	2,204	2,034	1,889	28,540
	Denied	794	1,071	1,200	822	541	412	386	373	5,599
	Denial Rate	12.9%	16.3%	19.3%	17.5%	16.9%	15.7%	16.0%	16.5%	16.4%
Not Available	Originated	321	518	408	211	162	123	142	156	2,041
	Denied	212	234	236	143	67	47	62	57	1,058
	Denial Rate	39.8%	31.1%	36.6%	40.4%	29.3%	27.6%	30.4%	26.8%	34.1%
Not Applicable	Originated	6	0	3	0	1	1	0	0	11
	Denied	4	1	0	0	1	0	0	0	6
	Denial Rate	39.8%	31.1%	36.6%	40.4%	29.3%	27.6%	30.4%	26.8%	35.3%
Total	Originated	6,059	6,480	5,861	4,365	2,960	2,443	2,306	2,129	32,603
	Denied	1,173	1,482	1,682	1,093	681	491	481	470	7,553
	Denial Rate	16.2%	18.6%	22.3%	20.0%	18.7%	16.7%	17.3%	18.1%	18.8%
Non-Hispanic	Originated	5,128	5,830	5,354	4,079	2,734	2,273	2,129	1,949	29,476
	Denied	846	1,201	1,423	913	605	429	398	398	6,213
	Denial Rate	14.2%	17.1%	21.0%	18.3%	18.1%	15.9%	15.7%	17.0%	17.4%
Hispanic	Originated	91	106	104	79	58	37	38	28	541
	Denied	26	45	36	35	16	11	13	14	196
	Denial Rate	22.2%	29.8%	25.7%	30.7%	21.6%	22.9%	25.5%	33.3%	26.6%

Table 10.D.9
Loan Applications by Reason for Denial
 10. Youngstown-Warren Housing Market Area
 2004–2011 HMDA Data

Denial Reason	2004	2005	2006	2007	2008	2009	2010	2011	Total
Debt-to-Income Ratio	122	130	184	113	80	91	96	94	910
Employment History	15	22	21	22	9	13	12	17	131
Credit History	287	264	279	225	167	123	138	110	1,593
Collateral	93	89	124	81	88	73	90	50	688
Insufficient Cash	19	24	19	23	20	8	12	13	138
Unverifiable Information	32	48	49	58	22	9	8	8	234
Credit Application Incomplete	69	90	113	128	98	79	48	85	710
Mortgage Insurance Denied	1	1	4	2	4	2	4	1	19
Other	247	414	266	83	43	30	25	22	1,130
Missing	288	400	623	358	150	63	48	70	2,000
Total	1,173	1,482	1,682	1,093	681	491	481	470	7,553

Table 10.D.10
Denial Rates by Income of Applicant
 10. Youngstown-Warren Housing Market Area
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	42.6%	46.2%	44.6%	45.2%	43.2%	43.8%	56.0%	63.3%	46.6%
\$15,001–\$30,000	23.1%	25.4%	32.7%	29.8%	26.7%	22.8%	20.1%	22.4%	26.4%
\$30,001–\$45,000	16.6%	18.8%	22.2%	20.9%	19.4%	15.6%	17.5%	19.0%	19.1%
\$45,001–\$60,000	13.5%	16.5%	21.4%	16.0%	19.3%	13.7%	18.0%	14.7%	16.8%
\$60,001–\$75,000	10.7%	15.9%	14.1%	14.7%	12.5%	11.6%	11.7%	18.2%	13.8%
Above \$75,000	8.0%	11.0%	12.1%	11.7%	10.0%	12.6%	9.8%	10.6%	10.7%
Data Missing	27.2%	22.1%	25.8%	25.9%	22.2%	23.7%	32.7%	40.0%	26.1%
Total	16.2%	18.6%	22.3%	20.0%	18.7%	16.7%	17.3%	18.1%	18.8%

Table 10.D.11
Denial Rates of Loans by Race/Ethnicity and Income of Applicant
 10. Youngstown-Warren Housing Market Area
 2004–2011 HMDA Data

Race	<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	Above \$75K	Data Missing	Average
American Indian	50.0%	35.7%	41.2%	10.0%	66.7%	4.8%	.0%	23.6%
Asian	50.0%	34.0%	24.5%	13.6%	7.1%	9.9%	.0%	18.3%
Black	51.8%	37.8%	28.4%	26.9%	29.0%	26.6%	33.3%	32.1%
White	44.9%	23.6%	16.8%	14.7%	11.9%	9.5%	21.4%	16.4%
Not Available	50.9%	40.8%	37.3%	32.6%	26.4%	18.9%	55.3%	34.1%
Not Applicable	100.0%	50.0%	33.3%	25.0%	100.0%	.0%	33.3%	35.3%
Average	46.6%	26.4%	19.1%	16.8%	13.8%	10.7%	26.1%	18.8%
Non-Hispanic Ethnicity	45.7%	25.0%	17.6%	15.4%	13.1%	10.1%	20.7%	17.4%
Hispanic (Ethnicity)	42.9%	35.3%	26.6%	22.1%	9.8%	8.6%	25.0%	26.6%

Table 10.D.12
Loan Applications by Reason for Denial by Race/Ethnicity of Applicant
 10. Youngstown-Warren Housing Market Area
 2004–2011 HMDA Data

Denial Reason	American Indian	Asian	Black	White	Not Available	Not Applicable	Total	Hispanic (Ethnicity)
Debt-to-Income Ratio	3	7	68	745	86	1	910	35
Employment History	0	2	9	107	13	0	131	7
Credit History	6	8	210	1,163	205	1	1,593	45
Collateral	0	4	51	569	63	1	688	19
Insufficient Cash	0	1	10	109	18	0	138	3
Unverifiable Information	0	2	37	169	26	0	234	8
Credit Application Incomplete	1	7	65	552	83	2	710	10
Mortgage Insurance Denied	0	0	2	17	0	0	19	1
Other	3	3	169	780	175	0	1,130	28
Missing	4	13	205	1,388	389	1	2,000	40
Total	17	47	826	5,599	1,058	6	7,553	196
% Missing	23.5%	27.7%	24.8%	24.8%	36.8%	16.7%	26.5%	20.4%

Table 10.D.13
Loan Applications by Income of Applicant: Originated and Denied
 10. Youngstown-Warren Housing Market Area
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Loan Originated	97	77	93	68	46	50	37	22	490
	Application Denied	72	66	75	56	35	39	47	38	428
	Denial Rate	42.6%	46.2%	44.6%	45.2%	43.2%	43.8%	56.0%	63.3%	46.6%
\$15,001–\$30,000	Loan Originated	1,173	1,226	1,083	786	517	480	421	346	6,032
	Application Denied	353	418	527	333	188	142	106	100	2,167
	Denial Rate	23.1%	25.4%	32.7%	29.8%	26.7%	22.8%	20.1%	22.4%	26.4%
\$30,001–\$45,000	Loan Originated	1,562	1,698	1,626	1,163	812	649	570	524	8,604
	Application Denied	312	393	463	308	196	120	121	123	2,036
	Denial Rate	16.6%	18.8%	22.2%	20.9%	19.4%	15.6%	17.5%	19.0%	19.1%
\$45,001–\$60,000	Loan Originated	1,193	1,332	1,110	869	539	468	442	436	6,389
	Application Denied	186	264	303	166	129	74	97	75	1,294
	Denial Rate	13.5%	16.5%	21.4%	16.0%	19.3%	13.7%	18.0%	14.7%	16.8%
\$60,001–\$75,000	Loan Originated	748	788	651	533	377	281	263	265	3,906
	Application Denied	90	149	107	92	54	37	35	59	623
	Denial Rate	10.7%	15.9%	14.1%	14.7%	12.5%	11.6%	11.7%	18.2%	13.8%
Above \$75,000	Loan Originated	1,117	1,207	1,166	886	641	486	540	515	6,558
	Application Denied	97	149	161	117	71	70	59	61	785
	Denial Rate	8.0%	11.0%	12.1%	11.7%	10.0%	12.6%	9.8%	10.6%	10.7%
Data Missing	Loan Originated	169	152	132	60	28	29	33	21	624
	Application Denied	63	43	46	21	8	9	16	14	220
	Denial Rate	27.2%	22.1%	25.8%	25.9%	22.2%	23.7%	32.7%	40.0%	26.1%
Total	Loan Originated	6,059	6,480	5,861	4,365	2,960	2,443	2,306	2,129	32,603
	Application Denied	1,173	1,482	1,682	1,093	681	491	481	470	7,553
	Denial Rate	16.2%	18.6%	22.3%	20.0%	18.7%	16.7%	17.3%	18.1%	18.8%

Table 10.D.14
Loan Applications by Income and Race/Ethnicity of Applicant: Originated and Denied
 10. Youngstown-Warren Housing Market Area
 2004–2011 HMDA Data

Race		<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	> \$75K	Data Missing	Total
American Indian	Loan Originated	1	9	10	9	1	20	5	55
	Application Denied	1	5	7	1	2	1	0	17
	Denial Rate	50.0%	35.7%	41.2%	10.0%	66.7%	4.8%	.0%	23.6%
Asian	Loan Originated	2	33	40	38	26	64	7	210
	Application Denied	2	17	13	6	2	7	0	47
	Denial Rate	50.0%	34.0%	24.5%	13.6%	7.1%	9.9%	.0%	18.3%
Black	Loan Originated	54	513	481	337	164	179	18	1,746
	Application Denied	58	312	191	124	67	65	9	826
	Denial Rate	51.8%	37.8%	28.4%	26.9%	29.0%	26.6%	33.3%	32.1%
White	Loan Originated	376	5,108	7,564	5,582	3,489	5,880	541	28,540
	Application Denied	307	1,578	1,522	959	470	616	147	5,599
	Denial Rate	44.9%	23.6%	16.8%	14.7%	11.9%	9.5%	21.4%	16.4%
Not Available	Loan Originated	57	368	507	420	226	412	51	2,041
	Application Denied	59	254	302	203	81	96	63	1,058
	Denial Rate	50.9%	40.8%	37.3%	32.6%	26.4%	18.9%	55.3%	34.1%
Not Applicable	Loan Originated	0	1	2	3	0	3	2	11
	Application Denied	1	1	1	1	1	0	1	6
	Denial Rate	100.0%	50.0%	33.3%	25.0%	100.0%	.0%	33.3%	35.3%
Total	Loan Originated	490	6,032	8,604	6,389	3,906	6,558	624	32,603
	Application Denied	428	2,167	2,036	1,294	623	785	220	7,553
	Denial Rate	46.6%	26.4%	19.1%	16.8%	13.8%	10.7%	26.1%	18.8%
Non-Hispanic Ethnicity	Loan Originated	404	5,414	7,803	5,789	3,549	5,969	548	29,476
	Application Denied	340	1,804	1,663	1,057	533	673	143	6,213
	Denial Rate	45.7%	25.0%	17.6%	15.4%	13.1%	10.1%	20.7%	17.4%
Hispanic (Ethnicity)	Loan Originated	24	156	146	81	55	64	15	541
	Application Denied	18	85	53	23	6	6	5	196
	Denial Rate	42.9%	35.3%	26.6%	22.1%	9.8%	8.6%	25.0%	26.6%

PREDATORY LENDING

Table 10.D.15
Originated Owner-Occupied Loans by HAL Status
 10. Youngstown-Warren Housing Market Area
 2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Other	4,966	4,583	4,080	3,613	2,485	2,255	2,289	2,108	26,379
HAL	1,093	1,897	1,781	752	475	188	17	21	6,224
Total	6,059	6,480	5,861	4,365	2,960	2,443	2,306	2,129	32,603
Percent HAL	18.0%	29.3%	30.4%	17.2%	16.0%	7.7%	.7%	1.0%	19.1%

Table 10.D.16
Loans by Loan Purpose by HAL Status
 10. Youngstown-Warren Housing Market Area
 2004–2011 HMDA Data

Loan Purpose		2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	Other	4,966	4,583	4,080	3,613	2,485	2,255	2,289	2,108	26,379
	HAL	1,093	1,897	1,781	752	475	188	17	21	6,224
	Percent HAL	18.0%	29.3%	30.4%	17.2%	16.0%	7.7%	.7%	1.0%	19.1%
Home Improvement	Other	1,029	1,161	1,194	1,155	696	436	481	432	6,584
	HAL	299	411	333	312	193	119	31	18	1,716
	Percent HAL	22.5%	26.1%	21.8%	21.3%	21.7%	21.4%	6.1%	4.0%	20.7%
Refinancing	Other	6,569	5,034	4,309	3,706	3,014	4,967	5,179	4,323	37,101
	HAL	2,006	2,683	2,391	1,258	842	553	43	35	9,811
	Percent HAL	23.4%	34.8%	35.7%	25.3%	21.8%	10.0%	.8%	.8%	20.9%
Total	Other	12,564	10,778	9,583	8,474	6,195	7,658	7,949	6,863	70,064
	HAL	3,398	4,991	4,505	2,322	475	188	17	21	17,751
	Percent HAL	21.3%	31.7%	32.0%	21.5%	19.6%	10.1%	1.1%	1.1%	20.2%

Table 10.D.17
HALs Originated by Race of Borrower
 10. Youngstown-Warren Housing Market Area
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	1	1	3	1	2	1	0	0	9
Asian	6	11	8	2	1	0	0	0	28
Black	134	249	242	100	24	8	1	1	759
White	797	1,313	1,321	577	419	171	16	20	4,634
Not Available	153	323	205	72	29	7	0	0	789
Not Applicable	2	0	2	0	0	1	0	0	5
Total	1,093	1,897	1,781	752	475	188	17	21	6,224
Hispanic (Ethnicity)	20	39	37	15	13	6	0	0	130

Table 10.D.18
Rate of HALs Originated by Race/Ethnicity of Borrower
 10. Youngstown-Warren Housing Market Area
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	12.5%	20.0%	33.3%	14.3%	28.6%	12.5%	.0%	.0%	16.4%
Asian	15.4%	28.9%	21.1%	6.1%	12.5%	.0%	.0%	.0%	13.3%
Black	40.2%	58.3%	65.1%	41.5%	20.5%	9.5%	1.0%	1.5%	43.5%
White	14.9%	23.9%	26.3%	14.9%	15.7%	7.8%	.8%	1.1%	16.2%
Not Available	47.7%	62.4%	50.2%	34.1%	17.9%	5.7%	.0%	.0%	38.7%
Not Applicable	33.3%	%	66.7%	%	.0%	100.0%	%	%	45%
Average	18.0%	29.3%	30.4%	17.2%	16.0%	7.7%	0.7%	01.0%	19.1%
Non-Hispanic Ethnicity	16.8%	26.2%	29.0%	16.5%	15.9%	7.7%	.8%	1.1%	17.8%
Hispanic (Ethnicity)	22.0%	36.8%	35.6%	19.0%	22.4%	16.2%	.0%	.0%	24.0%

Table 10.D.19
Loans by HAL Status by Race/Ethnicity of Borrower
 10. Youngstown-Warren Housing Market Area
 2004–2011 HMDA Data

Race	Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Other	7	4	6	6	5	7	6	5	46
	HAL	1	1	3	1	2	1	0	0	9
	Percent HAL	12.5%	20.0%	33.3%	14.3%	28.6%	12.5%	.0%	.0%	16.4%
Asian	Other	33	27	30	31	7	23	19	12	182
	HAL	6	11	8	2	1	0	0	0	28
	Percent HAL	15.4%	28.9%	21.1%	6.1%	12.5%	.0%	.0%	.0%	13.3%
Black	Other	199	178	130	141	93	76	104	66	987
	HAL	134	249	242	100	24	8	1	1	759
	Percent HAL	40.2%	58.3%	65.1%	41.5%	20.5%	9.5%	1.0%	1.5%	43.5%
White	Other	4,555	4,179	3,710	3,296	2,246	2,033	2,018	1,869	23,906
	HAL	797	1,313	1,321	577	419	171	16	20	4,634
	Percent HAL	14.9%	23.9%	26.3%	14.9%	15.7%	7.8%	0.8%	01.1%	16.2%
Not Available	Other	168	195	203	139	133	116	142	156	1,252
	HAL	153	323	205	72	29	7	0	0	789
	Percent HAL	47.7%	62.4%	50.2%	34.1%	17.9%	5.7%	.0%	.0%	38.7%
Not Applicable	Other	4	0	1	0	1	0	0	0	6
	HAL	2	0	2	0	0	1	0	0	5
	Percent HAL	33.3%	%	66.7%	%	.0%	100.0%	%	%	45.0%
Total	Other	4,966	4,583	4,080	3,613	2,485	2,255	2,289	2,108	26,379
	HAL	1,093	1,897	1,781	752	475	188	17	21	6,224
	Percent HAL	18.0%	29.3%	30.4%	17.2%	16.0%	7.7%	.7%	1.0%	19.1%
Non-Hispanic Ethnicity	Other	4,265	4,300	3,804	3,408	2,300	2,097	2,113	1,928	24,215
	HAL	863	1,530	1,550	671	434	176	16	21	5,261
	Percent HAL	16.8%	26.2%	29.0%	16.5%	15.9%	7.7%	.8%	1.1%	17.8%
Hispanic (Ethnicity)	Other	71	67	67	64	45	31	38	28	411
	HAL	20	39	37	15	13	6	0	0	130
	Percent HAL	22.0%	36.8%	35.6%	19.0%	22.4%	16.2%	.0%	.0%	24.0%

Table 10.D.20
Rates of HALs by Income of Borrower
 10. Youngstown-Warren Housing Market Area
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Average
\$15,000 or Below	26.8%	39.0%	39.8%	36.8%	28.3%	16.0%	2.7%	.0%	28.6%
\$15,001–\$30,000	26.7%	41.4%	46.3%	26.6%	24.0%	10.4%	1.4%	1.4%	28.4%
\$30,001–\$45,000	21.3%	34.9%	33.9%	19.7%	20.8%	8.9%	.4%	1.3%	22.6%
\$45,001–\$60,000	18.5%	27.6%	29.5%	14.6%	13.9%	6.4%	1.4%	.7%	18.1%
\$60,001–\$75,000	11.9%	20.7%	22.1%	12.9%	11.4%	6.8%	.4%	.4%	13.5%
Above \$75,000	7.4%	15.7%	14.7%	8.1%	8.0%	4.7%	0.2%	1.0%	9.1%
Data Missing	17.2%	30.3%	37.1%	35.0%	.0%	.0%	.0%	.0%	23.2%
Average	18.0%	29.3%	30.4%	17.2%	16.0%	7.7%	.7%	1.0%	19.1%

Table 10.D.21
Loans by HAL Status by Income of Borrower
 10. Youngstown-Warren Housing Market Area
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Other	71	47	56	43	33	42	36	22	350
	HAL	26	30	37	25	13	8	1	0	140
	Percent HAL	26.8%	39.0%	39.8%	36.8%	28.3%	16.0%	2.7%	.0%	28.6%
\$15,001–\$30,000	Other	860	719	582	577	393	430	415	341	4,317
	HAL	313	507	501	209	124	50	6	5	1,715
	Percent HAL	26.7%	41.4%	46.3%	26.6%	24.0%	10.4%	1.4%	1.4%	28.4%
\$30,001–\$45,000	Other	1,230	1,105	1,075	934	643	591	568	517	6,663
	HAL	332	593	551	229	169	58	2	7	1,941
	Percent HAL	21.3%	34.9%	33.9%	19.7%	20.8%	8.9%	.4%	1.3%	22.6%
\$45,001–\$60,000	Other	972	964	782	742	464	438	436	433	5,231
	HAL	221	368	328	127	75	30	6	3	1,158
	Percent HAL	18.5%	27.6%	29.5%	14.6%	13.9%	6.4%	1.4%	.7%	18.1%
\$60,001–\$75,000	Other	659	625	507	464	334	262	262	264	3,377
	HAL	89	163	144	69	43	19	1	1	529
	Percent HAL	11.9%	20.7%	22.1%	12.9%	11.4%	6.8%	.4%	.4%	13.5%
Above \$75,000	Other	1,034	1,017	995	814	590	463	539	510	5,962
	HAL	83	190	171	72	51	23	1	5	596
	Percent HAL	7.4%	15.7%	14.7%	8.1%	8.0%	4.7%	.2%	1.0%	9.1%
Data Missing	Other	140	106	83	39	28	29	33	21	479
	HAL	29	46	49	21	0	0	0	0	145
	Percent HAL	17.2%	30.3%	37.1%	35.0%	.0%	.0%	.0%	.0%	23.2%
Total	Other	4,966	4,583	4,080	3,613	2,485	2,255	2,289	2,108	26,379
	HAL	1,093	1,897	1,781	752	475	188	17	21	6,224
	Percent HAL	18.0%	29.3%	30.4%	17.2%	16.0%	7.7%	.7%	1.0%	19.1%

E. CRA DATA

Additional data tables related to Community Reinvestment Act (CRA) data are presented in this section.

Table 10.E.1
Small Business Loans Originated: \$100,000 or Less by Tract MFI
 10. Youngstown-Warren Housing Market Area
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	439	623	2,864	2,722		6,648
2001	445	676	3,082	2,849		7,052
2002	470	781	3,740	3,338		8,329
2003	377	1,192	4,637	3,004		9,210
2004	323	1,119	4,913	2,914		9,269
2005	291	1,019	5,095	2,949		9,354
2006	376	1,233	6,257	3,915		11,781
2007	369	1,338	6,979	4,356		13,042
2008	277	980	4,877	3,260		9,394
2009	136	400	2,146	1,498		4,180
2010	149	408	2,077	1,411		4,045
2011	158	489	2,584	1,665		4,896
Total	3,810	10,258	49,251	33,881	0	97,200
Loan Amount (\$1,000s)						
2000	5,582	8,287	39,637	39,606		93,112
2001	4,702	8,264	38,409	36,799		88,174
2002	6,151	8,106	38,170	38,612		91,039
2003	4,222	12,255	45,684	29,585		91,746
2004	3,689	11,986	49,195	28,251		93,121
2005	3,581	10,892	55,629	34,397		104,499
2006	3,577	12,893	64,941	37,976		119,387
2007	3,706	13,315	67,125	45,552		129,698
2008	2,611	9,479	44,760	30,391		87,241
2009	2,199	6,313	28,706	18,841		56,059
2010	2,607	7,875	35,102	24,084		69,668
2011	3,057	8,362	40,582	26,288		78,289
Total	45,684	118,027	547,940	390,382	0	1,102,033

Table 10.E.2
Small Business Loans Originated: \$100,001 to \$250,000 by Tract MFI
 10. Youngstown-Warren Housing Market Area
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	24	29	125	160		338
2001	24	28	157	174		383
2002	23	36	137	193		389
2003	11	42	176	146		375
2004	14	40	201	129		384
2005	9	56	174	142		381
2006	20	32	162	105		319
2007	11	45	167	121		344
2008	14	28	99	76		217
2009	18	38	130	67		253
2010	8	41	123	87		259
2011	18	40	162	109		329
Total	194	455	1,813	1,509	0	3,971
Loan Amount (\$1,000s)						
2000	4,060	4,286	21,750	27,629		57,725
2001	4,229	4,963	26,029	31,265		66,486
2002	3,676	5,796	23,720	32,814		66,006
2003	1,785	7,301	29,411	25,749		64,246
2004	2,452	6,786	35,425	22,276		66,939
2005	1,607	9,911	30,478	24,695		66,691
2006	3,732	5,928	27,319	18,282		55,261
2007	1,860	7,529	28,716	20,984		59,089
2008	2,520	4,902	17,779	12,952		38,153
2009	3,300	6,960	22,607	11,322		44,189
2010	1,569	7,794	21,486	15,815		46,664
2011	3,252	7,467	28,458	19,125		58,302
Total	34,042	79,623	313,178	262,908	0	689,751

Table 10.E.3
Small Business Loans Originated: More than \$250,000 by Tract MFI
 10. Youngstown-Warren Housing Market Area
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	20	17	111	130		278
2001	29	22	116	186		353
2002	20	19	116	201		356
2003	18	49	166	118		351
2004	13	49	193	123		378
2005	12	48	145	117		322
2006	13	37	144	112		306
2007	6	41	119	116		282
2008	6	35	88	92		221
2009	9	39	132	99		279
2010	25	47	133	107		312
2011	12	58	161	106		337
Total	183	461	1,624	1,507	0	3,775
Loan Amount (\$1,000s)						
2000	12,183	6,918	54,897	66,554		140,552
2001	15,182	11,302	56,895	95,080		178,459
2002	9,817	9,417	56,004	100,116		175,354
2003	8,757	26,688	83,274	58,853		177,572
2004	6,343	26,823	95,512	65,709		194,387
2005	6,748	26,263	74,096	61,172		168,279
2006	6,556	20,747	73,984	55,756		157,043
2007	3,140	20,261	62,247	56,350		141,998
2008	3,850	18,427	44,732	43,898		110,907
2009	5,044	20,859	70,244	52,180		148,327
2010	12,777	25,787	71,088	50,598		160,250
2011	6,034	32,482	88,186	55,023		181,725
Total	96,431	245,974	831,159	761,289	0	1,934,853

Table 10.E.4
Small Business Loans to Businesses with Gross Annual Revenues of Less Than \$1 Million by Tract MFI
 10. Youngstown-Warren Housing Market Area
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	116	238	1,206	1,215		2,775
2001	175	255	1,364	1,382		3,176
2002	101	216	1,038	1,151		2,506
2003	116	351	1,615	1,092		3,174
2004	96	319	1,557	1,000		2,972
2005	107	430	2,283	1,357		4,177
2006	112	438	2,480	1,465		4,495
2007	102	472	2,647	1,620		4,841
2008	70	285	1,644	1,055		3,054
2009	30	138	795	493		1,456
2010	50	181	875	570		1,676
2011	59	222	1,217	803		2,301
Total	1,134	3,545	18,721	13,203	0	36,603
Loan Amount (\$1,000s)						
2000	6,287	9,243	49,608	63,984		129,122
2001	5,989	8,536	60,379	90,752		165,656
2002	6,953	11,554	60,006	89,756		168,269
2003	8,222	14,238	78,734	54,103		155,297
2004	5,509	11,694	66,115	56,435		139,753
2005	4,727	12,290	70,830	55,416		143,263
2006	3,931	12,860	71,294	58,267		146,352
2007	2,360	11,836	57,724	53,066		124,986
2008	2,108	6,393	33,488	36,572		78,561
2009	649	5,976	33,337	33,119		73,081
2010	2,368	10,392	38,782	29,160		80,702
2011	3,517	7,361	45,869	35,711		92,458
Total	52,620	122,373	666,166	656,341	0	1,497,500

F. COMPLAINT DATA

This section contains data regarding fair housing complaints, as provided by the U.S. Department of Housing and Urban Development (HUD), the Ohio Civil Rights Commission (OCRC), and the Fair Housing Contact Service (FHCS).

HUD COMPLAINTS

Table 10.F.1
Fair Housing Complaints by Basis
 10. Youngstown-Warren Housing Market Area
 2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color		1			3	1		1		6
Disability	8	1	7	8	4	1	3	4	6	42
Family Status	1	2	3	2	1	5	1	1	2	18
National Origin					1				1	2
Race	4	4	2	6	3	6	4	5	5	39
Religion	1		1		2			1	1	6
Sex				3		2		1		6
Total Bases	14	8	13	19	14	15	8	13	15	119
Total Complaints	12	7	12	17	8	13	8	11	10	98

Table 10.F.2
Fair Housing Complaints by Issue
 10. Youngstown-Warren Housing Market Area
 2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Discrimination in terms, conditions or privileges relating to rental	4	2	4	3	3	4	4	2		26
Failure to make reasonable accommodation	5	1	4	1	1		1	1	4	18
Discriminatory refusal to rent	2			7		2		1	3	15
Discriminatory terms, conditions, privileges, or services and facilities	1	1	3	1	1	1		3	4	15
Discriminatory advertisement - rental			2		1	3		1		7
Discriminatory refusal to rent and negotiate for rental				2			2	1	1	6
Discriminatory advertising, statements, and notices						1	2	2	1	6
Otherwise deny or make housing available	1	1					1	2	1	6
Discriminatory acts under Section 818 (coercion, etc.)		1	1	1				1	2	6
Discrimination in services and facilities relating to rental						1	1		2	4
Other discriminatory acts		1			1			1	1	4
Discriminatory refusal to sell			1	1					1	3
False denial or representation of availability - rental					1	1			1	3
Discriminatory financing (includes real estate transactions)					1		1	1		3
False denial or representation of availability	1						1			2
Discriminatory refusal to negotiate for sale						1				1
Discriminatory refusal to negotiate for rental								1		1
False denial or representation of availability - sale									1	1
Discrimination in the terms or conditions for making loans							1			1
Discrimination in the selling of residential real property					1					1
Discrimination in terms, conditions, privileges relating to sale									1	1
Steering							1			1
Using ordinances to discriminate in zoning and land use								1		1
Failure to provide usable doors	1									1
Failure to permit reasonable modification				1						1
Total Issues	15	7	15	17	10	14	15	18	23	134
Total Complaints	12	7	12	17	8	13	8	11	10	98

Table 10.F.3
Fair Housing Complaints by Closure Status
 10. Youngstown-Warren Housing Market Area
 2004–2012 HUD Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Administrative Closure Cause (FHAP)	1	1	2	3		6	5	3	1	22
Conciliated / Settled			1					2		3
No Cause	6	3	4	9	4	2	2	2	1	33
Open	5	3	5	5	4	5	1	4	1	33
									7	7
Total Complaints	12	7	12	17	8	13	8	11	10	98

HUD Complaints Found With Cause

Table 10.F.4
Fair Housing Complaints Found With Cause by Basis
 10. Youngstown-Warren Housing Market Area
 2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color		1								1
Disability	5	1	3	6	3		2	2	1	23
Family Status		1	2	1	1			1		6
Race	2	1		1		1				5
Sex				1		1				2
Total Bases	7	4	5	9	4	2	2	3	1	37
Total Complaints	6	3	5	9	4	2	2	4	1	36

Table 10.F.5
Fair Housing Complaints Found With Cause by Issue
 10. Youngstown-Warren Housing Market Area
 2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Failure to make reasonable accommodation			3	1	2	1	1		1	11
Discriminatory refusal to rent			2			3		1		6
Discrimination in terms, conditions or privileges relating to rental				1		2	2		1	6
Discriminatory terms, conditions, privileges, or services and facilities			1		2	1	1			5
Discriminatory advertisement - rental					2					3
Discrimination in services and facilities relating to rental							1	1		3
Otherwise deny or make housing available			1	1						3
Discriminatory refusal to sell						1				1
Discriminatory refusal to rent and negotiate for rental									1	1
False denial or representation of availability			1							1
Discriminatory financing (includes real estate transactions)									1	1
Other discriminatory acts									1	1
Discriminatory acts under Section 818 (coercion, etc.)					1					1
Failure to provide usable doors			1							1
Failure to permit reasonable modification						1				1
Total Issues	9	3	7	9	4	2	3	6	2	45
Total Complaints	6	3	5	9	4	2	2	4	1	36

OHIO CIVIL RIGHTS COMMISSION COMPLAINTS

Table 10.F.6

Fair Housing Complaints by Basis
 10. Youngstown-Warren Housing Market Area
 2004–2012 OCRC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Age	1									1
Color				1	1	3		1		6
Disability	6	1	9	7	2	2	4	4	2	37
Family Status			3	2	1	1	2			9
Gender		1	1	3		2	1	1		9
National Origin						1				1
Race	7	1	3	6	7	3	3	5	2	37
Religion	1			1	2			1		5
Retaliation		1		2	1		1	1	1	7
Total Bases	15	4	16	22	10	16	11	13	5	112
Total Complaints	12	2	14	18	6	12	9	9	4	86

Table 10.F.7

Fair Housing Complaints by Issue
 10. Youngstown-Warren Housing Market Area
 2004–2012 OCRC Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Advertising			1	1						2
Discharge				1						1
Harassment			1	1						2
Intimidation				2	3	1			2	8
Other	4	1		5	2	3	3	4	1	23
Reasonable Accommodation	4		5	1			1		1	12
Sexual Harassment						1				1
Terms and Conditions	4	1	11	14	2	8	6	5	2	53
Total Issues	12	2	18	25	7	13	10	9	6	102
Total Complaints	12	2	14	18	6	12	9	9	4	86

Table 10.F.8

Fair Housing Complaints by Closure Status
 10. Youngstown-Warren Housing Market Area
 2004–2012 OCRC Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
CP Failed to Cooperate			1	3		2	2	2		10
CP Withdrawal – No Benefit				1			2		1	4
No Cause Finding Issued	6	1	7	5	3	7	2	5	1	37
No Jurisdiction									1	1
Settlement With Benefits	3		4	6	1	1	2	1		18
Successful Conciliation			1							1
Withdrawal With Benefits	2	1	1	3	2	2	1	1	1	14
Missing	1									1
Total Complaints	12	2	14	18	6	12	9	9	4	86

FAIR HOUSING CONTACT SERVICE COMPLAINTS

Table 10.F.9

Fair Housing Complaints by Basis
10. Youngstown-Warren Housing Market Area
2004–2012 FHCS Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color					2					2
Disability			1	1	4	1			8	15
Familial Status					8			1		9
Race					3	1				4
Other					1				1	2
Unknown				1						1
Total Bases	0	0	1	2	18	2	0	1	9	33
Total Complaints			1	2	13	2		1	9	28

Table 10.F.10

Fair Housing Complaints by Closure Status
10. Youngstown-Warren Housing Market Area
2004–2012 FHCS Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Closed				1	3	2				6
Elected not to pursue									1	1
Inquiry					1				3	4
Lack of jurisdiction					6					6
No contact									1	1
No probable cause				1	1				1	3
Pending			1						2	3
Probable cause								1		1
Reasonable accommodation granted									1	1
Withdrawal of Charge					2					2
Total Complaints	0	0	1	2	13	2	0	1	9	28

G. FAIR HOUSING SURVEY FOR HOUSING STAKEHOLDERS DATA

This section presents public involvement data gathered through the 2012–2013 Fair Housing Survey for Housing Stakeholders.

Table 10.G.1

Primary Role of Respondent
10. Youngstown-Warren Housing Market Area
2012–2013 Fair Housing Survey for Housing Stakeholders Data

Primary Role	Total
Advocate/Service Provider	8
Condo or Homeowner Association Leader	2
Construction/Development	4
Law/Legal Services	1
Local Government	5
Property Management	4
Real Estate	15
Resident Advisory Council Leader	3
Other Role	5
Total	47

FEDERAL, STATE, AND LOCAL LAWS

Table 10.G.2
Familiarity with Fair
Housing Laws

10. Youngstown-Warren Housing
Market Area
2012–2013 Fair Housing Survey
for Housing Stakeholders Data

Familiarity	Total
Not Familiar	5
Somewhat Familiar	15
Very Familiar	13
Missing	14
Total	47

Table 10.G.3
Perceptions About Fair Housing Laws

10. Youngstown-Warren Housing Market Area
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?	31	3	1	12	47
Are fair housing laws difficult to understand or follow?	10	19	6	12	47
Do you think fair housing laws should be changed?	5	16	14	12	47
Do you thing fair housing laws are adequately enforced?	20	14	1	12	47

Table 10.G.4
Fair Housing Activities

10. Youngstown-Warren Housing Market Area
2012–2013 Fair Housing Survey for Housing Stakeholders Data

2012 - 2016 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?		20	14	1	12	47
Have you participated in fair housing training?		19	2		26	47
Are you aware of any fair housing testing?		4	17	14	12	47
Testing and education	Too Little	Right Amount	Too Much	Don't Know	Missing	Total
Is there sufficient outreach and education activity?	14	7		14	12	47
Is there sufficient testing?	5	1		29	12	47

Table 10.G.5**Protected Classes**

10. Youngstown-Warren
Housing Market Area
2012–2013 Fair Housing Survey
for Housing Stakeholders Data

Protected Class	Total
Family Status	14
Religion	16
Gender	14
National Origin	9
Color	8
Sexual Orientation	5
Age	9
Military	5
Disability	4
Ancestry	5
Ethnicity	2
Race	2
Other	4
Total	97

Table 10.G.6**Fair Housing Violation Referrals**

10. Youngstown-Warren Housing Market Area
2012–2013 Fair Housing Survey for Housing Stakeholders Data

Referral	Total
Board of Realtors	1
City	1
County	2
Don't Know	2
Greater Warren-Youngstown Urban League	3
HUD	8
Lawyer	2
Legal Aid	3
OCRC	2
Ohio Division of Real Estate and Professional Licensing	2
Other	4
Youngstown Human Relations Commission	6
Total	36

LOCAL FAIR HOUSING**Table 10.G.7****Local Fair Housing**

10. Youngstown-Warren Housing Market Area
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?	10	13	9	15	47
Are there any specific geographic areas that have fair housing problems?	5	6	19	17	47
Are there any specific groups in that face housing discrimination?	10	6	15	16	47

FAIR HOUSING IN THE PRIVATE SECTOR

Table 10.G.8

Barriers to Fair Housing in the Private Sector

10. Youngstown-Warren Housing Market Area
2012–2013 Fair Housing Survey for Housing Stakeholders Data

Question	Yes	No	Don't Know	Missing	Total
Are you aware of any questionable practices or barriers to fair housing choice in:					
The rental housing market?	8	17	7	15	47
The real estate industry?	4	19	9	15	47
The mortgage and home lending industry?	8	12	12	15	47
The housing construction or accessible housing design fields?	4	14	14	15	47
The home insurance industry?	5	14	13	15	47
The home appraisal industry?	2	14	16	15	47
Any other housing services?	1	15	15	16	47

FAIR HOUSING IN THE PUBLIC SECTOR

Table 10.G.9

Barriers to Fair Housing in the Public Sector

10. Youngstown-Warren Housing Market Area
2012–2013 Fair Housing Survey for Housing Stakeholders Data

Question	Yes	No	Don't Know	Missing	Total
Are you aware of any questionable practices or barriers to fair housing choice in:					
Land use policies?	5	20	7	15	47
Zoning laws?	6	14	11	16	47
Occupancy standards or health and safety codes?	4	13	15	15	47
Property tax policies?	5	13	15	14	47
Permitting process?	1	14	18	14	47
Housing construction standards?	2	13	18	14	47
Neighborhood or community development policies?	7	15	11	14	47
Limited access to government services, such as employment services?	11	15	7	14	47
Public administrative actions or regulations?	1	13	17	16	47

NARRATIVE COMMENTS

Federal, State, and Local Laws

Table 10.G.10

How did you become aware of fair housing laws?

10. Youngstown-Warren Housing Market Area
2013 Fair Housing Survey Data

Comments:
<p>25 years in HUD rental programs Been doing this for over 30 years dealing with HUD and ODOD, now ODSA< Generally through my work. I am a housing advocate and present trainings on Fair Housing. I am part of the Trumbull Housing Collaborative and I am a homeless outreach worker In the past I was a landlord; also, I have been asked by a number of international students to intervene in tenant/landlord disputes. Ongoing education Our agency participates on the local Housing Collaborative. personal experiences Real estate agent/Broker fro the last 30 years real estate classes, trainings,etc.. Real Estate Investors Assoc education Real estate law Real estate license and continuing education classes. realtors must always go to classes Retired city planner in Warren. Through real estate Throughout my career as a Real Estate Agent the education and updates keep us aware of fair housing laws. With events at association on Fair Housing Work on a housing services board.</p>

Table 10.G.11

How should fair housing laws be changed?

10. Youngstown-Warren Housing Market Area
2013 Fair Housing Survey Data

Comments:
<p>criminal background checks, all offenses should not bar you from living in decent housing, landlords should be responsible to affordable and decent housing, Have inspectors to go and find out if the laws are being upheld. The Urban League has done it in the past. I should be able to rent my property to anyone i want to. It is my property and I want someone that will take care of it. Need to include sexual orientation Those reentering Income Think laws should be upadated to reflex issues and concern revelant to a changing conditions.</p>

Local Fair Housing

Table 10.G.12

Are there any specific geographic areas that have fair housing problems?

10. Youngstown-Warren Housing Market Area
2013 Fair Housing Survey Data

Comments:
<p>north side Summer wind development. And barnstone development. The third ward. The rich class has very few medium housing rentals if any at all. The urban centers of Youngstown and Warren have too few safe and affordable housing options. yes, limits need to be placed on rental units. they are priced at above 45% of the average household income.</p>

Table 10.G.13
Are there any specific groups in that face housing discrimination?

10. Youngstown-Warren Housing Market Area
 2013 Fair Housing Survey Data

Comments:
<p>disabled Homeless and very low income trying to get in subsidized housing. It takes 6 to 8 weeks to pass screening by then I lost touch with those waiting for housing. Entire process is too long, yet there are a plenty of empty units at the high rise in Warren sitting empty. Individuals with mental illness and those who have a criminal background low income, convicted felons, other than registered sex offenders Racial and ethnic minorities. racial minorities, low income households, special needs populations Senior citizens..... who rent from RDW (a rental landlord). They are being assessed more rent money if they try to have say 2 seniors who want to rent a 2 bedroom or loft apartment from this landlord, location in question is Boardman, in the Huntington Woods area apartments. This owner is forever ripping these people off with some nickel and dime charges for everything and anything he can come up with, monthly and yearly, on lease renewals you name it. This is not fair or right. The black and Indian community from my earlier examples. They are disparate impact issues. Housing not in neighborhoods, but rather across from industrial site. unemployed out of work - no rentals or not enough</p>

Table 10.G.14
Please share any additional comments.

10. Youngstown-Warren Housing Market Area
 2013 Fair Housing Survey Data

Comments:
<p>Howard Hanna real estate company agents that work in Canfield discriminate often. see box 3 above.</p>

Fair Housing in the Private Sector

Table 10.G.15
Are you aware of any questionable practices or barriers to fair housing choice in the rental housing market?

10. Youngstown-Warren Housing Market Area
 2013 Fair Housing Survey Data

Comments:
<p>A person with an Indian accent could not rent a place but when he called back and changed his voice he was offered to see the place. Canfield Ohio does not accept people of color color Have heard from various senior friends that they feel they are being charged more for rent so they won't choose to live in certain apartment communities, charging more if say two sisters decide to split the rent and live together to help keep their rental expense down. Landlords who don't want black tenants. I work with HIV positive persons and know people who've been kicked out when the landlord found out. rather than answer each of these separately, let me simply state that I have a general sense that practices negatively impacting fair housing continue to be practiced, though less frequently, and less blatantly, than in the past. I believe the practices are now more likely to be informal. There are sexual orientation, religious, and ethnicity barriers. Unknown. When employed we referred to the proper organizations and if they were politically connected we would be directed NOT to do it..</p>

Table 10.G.16**Are you aware of any questionable practices or barriers to fair housing choice in the real estate industry?**

10. Youngstown-Warren Housing Market Area
2013 Fair Housing Survey Data

Comments:
A coworker said she decided to change her name from an ethnic one to a more common one so she could go through the process of looking at and buying a home. Her decision was based on her experience of not getting calls back from people in the home buying process in the area in the past. Again race plays a part. I only "know" this anecdotally. All too common practice even today. See above answer in block number 1.

Table 10.G.17**Are you aware of any questionable practices or barriers to fair housing choice in the mortgage and home lending industry?**

10. Youngstown-Warren Housing Market Area
2013 Fair Housing Survey Data

Comments:
I personally have visited several banks and was basically turned away with before they even took my application. They gave me the "ive been doing this for years and you probably dont qualify" People of color have difficulty obtaining loans. Part of that is based on neighborhoods. Persons of color higher rates. I am a single woman with an 800 credit score currently refinancing and was given a quote of over 1% higher from the bank's mortgage dept than I'd been quoted by two different branch staff. When I pointed it out, suddenly that lower rate was in fact available. Probable to minorities or others with large families. see above story. Taking advantage of the elderly. This was before the Predatory Lending penalties were issued. Hopefully, it's better now. However, there are still greedy folks out there.

Table 10.G.18**Are you aware of any questionable practices or barriers to fair housing choice in the housing construction or accessible housing design fields?**

10. Youngstown-Warren Housing Market Area
2013 Fair Housing Survey Data

Comments:
Enforcement, Enforcement, Enforcement. Handicapped acessbilty is required by law. I understand a Canfield new housing development would not permit any section 8 in there (summer wind development). I understand they want no people of color Sometimes the building code doesn't work. Sometimes there are NIMBYS that have too much influence.

Table 10.G.19**Are you aware of any questionable practices or barriers to fair housing choice in the home insurance industry?**

10. Youngstown-Warren Housing Market Area
2013 Fair Housing Survey Data

Comments:
many of the families we work with have inadequate or no home owners insurance. We work exclusively with low income home owners. The refusal to insure homes near abandoned properties has a disparate impact on people of color.

Table 10.G.20**Are you aware of any questionable practices or barriers to fair housing choice in the home appraisal industry?**

10. Youngstown-Warren Housing Market Area
2013 Fair Housing Survey Data

Comments:
But, I would assume there is.

Table 10.G.21**Are you aware of any questionable practices or barriers to fair housing choice in any other housing services?**

10. Youngstown-Warren Housing Market Area
2013 Fair Housing Survey Data

Comments:
Crappy, unsafe, substandard rental units and rental houses for the poor. If the lenders don't want you to have a home they will tel you that the value does not meet the price.

Fair Housing in the Public Sector**Table 10.G.22****Are you aware of any questionable practices or barriers to fair housing choice in land use policies?**

10. Youngstown-Warren Housing Market Area
2013 Fair Housing Survey Data

Comments:
big lot zoning, NIMBY concerning affordable housing Low-income housing is concentrated in areas bordering industrial sites. Violent NYMBIS have been the rule in the past and present. There have been marches currently in 2012 in Warren against elderly housing units. Youngstown is currently updating their zoning code but the current code limits these types of uses in specific zoned areas.

Table 10.G.23**Are you aware of any questionable practices or barriers to fair housing choice in zoning laws?**

10. Youngstown-Warren Housing Market Area
2013 Fair Housing Survey Data

Comments:
Around Wick Park, a commercial owner asked me to help her find a suitable location for a purposed group home looking to locate to an adjacent corner rom heer office. Told her no, will not help her now that I know what she was up too. Against the law for me and I walked. And, this person is an attorney and major landord of many inferior homes in Youngstown. She builds home on a variety of grants and takes advantage of minupulating the public when she sells these homes or charges out rent to the low income tenants, Bad news here! Inadequate. Laws r not followed in Canfield. Religious community for whom I work are being challenged for wanting to build moderate income apartments in their motherhouse, despite the fact that the residences in question sit on land the community used to own. When they tried to build a senior apt bldg years ago locals had the land declared wet lands, then the developer that wanted to put high end homes on it got it reversed. Same as above for multifamily housing. Zoning and Spacing requirements limit the placement of group homes

Table 10.G.24**Are you aware of any questionable practices or barriers to fair housing choice in occupancy standards or health and safety codes?**

10. Youngstown-Warren Housing Market Area
2013 Fair Housing Survey Data

Comments:
Code enforcement rarely occurs here Codes have not been enforced in low-income neighborhoods for years. It is getting better. Probably decades out of date. See box 2 above. The community that I live in is not immigrant but low income and high poverty and the homes are not up to code and codes are not enforced. Health department does not enforce violations

Table 10.G.25**Are you aware of any questionable practices or barriers to fair housing choice in property tax policies?**

10. Youngstown-Warren Housing Market Area
2013 Fair Housing Survey Data

Comments:
City of Youngstown, especially around the YSU and Wick Park areas. Lack of tax incentives for making home improvements Republicans have run Ohio for too long to update them. Septic

Table 10.G.26**Are you aware of any questionable practices or barriers to fair housing choice in the permitting process?**

10. Youngstown-Warren Housing Market Area
2013 Fair Housing Survey Data

Comments:
Warren probably does not do it. They are required to have an interpreter on call.

Table 10.G.27**Are you aware of any questionable practices or barriers to fair housing choice in housing construction standards?**

10. Youngstown-Warren Housing Market Area
2013 Fair Housing Survey Data

Comments:
But sometimes, the permitting agencies don't know the standards thoroughly. Septic? State and National Building codes, probably a versions behind.

Table 10.G.28**Are you aware of any questionable practices or barriers to fair housing choice in neighborhood or community development policies?**

10. Youngstown-Warren Housing Market Area
2013 Fair Housing Survey Data

Comments:
a great deal of money is devoted to projects in so called "targeted development". Canfield does not permit low Income housing City of Youngstown, especially the YSU and Wick Park areas, and the Wick Neighbors Association, they want everything torn down if they don't like existing commercial bldg's next to residential locations, even if the out of town owner has the bldg on the market or sell. Community Development in our area, is very shady and secretive about their work, you can not get a straight forward answer from them? the program has not benefited the community at all, the head of two nonprofit organizations that handle the HUD money is the same person, and he gets paid by both of them, the the housing program is a failure, and I think they should be investigated, due to past problems with mismanagement of money. Low-income housing is not near to transportation or jobs creating a disparate impact on people of color and females. The local government does not encourage development that is real and applicable to this area. Developers have a difficult time with so much red tape and lack of incentives. We have a master plan, but there is no implementation taken due to the person running the position at present.

Table 10.G.29**Are you aware of any barriers that limit access to government services, such as a lack of transportation or employment services?**10. Youngstown-Warren Housing Market Area
2013 Fair Housing Survey Data

Comments:
lack of transportation lack of employment services lack of employment opportunities limited times that the buses run. Public transportation is limited Public transportation options poor. There is currently no form of public transportation in our county. transportation We only have a limited transportation system from the county. It is not enough to serve the needs of the community. Yes we do not have a public transit system, and most jobs are outside of the city in the rural area, limited transportation is a major problem for our area. Looking for ways to reinstate the public transit, the system that we have in place is not economic sound and does not benefit enough people for cost Yes, there is a huge lack of public transportation. Youngstown recently cut back on bus service due to budget cuts.

Table 10.G.30**Are you aware of any questionable practices or barriers to fair housing choice in any other public administrative actions or regulations?**10. Youngstown-Warren Housing Market Area
2013 Fair Housing Survey Data

Comments:
Canfield zoning Canfield trustees Canfield residents High rental rates are far too high for a town as Warren with hundreds of vacant rental units.

H. LAND USE PLANNING SURVEY DATA

This section contains data regarding the potential effects of local land use and housing policies on fair housing choice, as gathered from the Fair Housing Survey for Government Officials.

FAIR HOUSING SURVEY FOR GOVERNMENT OFFICIALS

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 was conducted predominately online. Respondents were solicited by mass-distributed emails sent by the NEOSCC, members of the Progress Review Team, and other various organizations in the 12-county region.

This section contains data gathered from the public sector staff in the Youngstown-Warren Housing Market Area that received and completed the survey.⁴⁷

⁴⁷ For areas with both nonentitlement and entitlement communities, the results of the nonentitlement community government official survey and the entitlement community interviews were summed.

Table 10.H.1
Housing Development
 10. Youngstown-Warren Housing Market Area
 2012 Fair Housing Survey for Government Officials Data

Question: Does your jurisdiction have...	Yes	No	Don't Know	Missing	Total
Housing Development					
Definitions for "dwelling unit" or "residential unit"?	22	9	12	35	78
Guidelines that encourage development affordable housing units?	5	29	9	35	78
Any potential barriers to the development of low- to moderate- income housing?	15	22	7	34	78
Guidelines that allow the development of mixed use housing?	18	11	12	37	78
Any potential barriers to the development of mixed use housing?	12	14	15	37	78
Occupancy Standards					
A definition for the term "family"?	13	17	13	35	78
Residential occupancy standards or limits?	9	19	13	37	78
Special Needs Housing					
A definition for the term "disability"?	4	20	13	41	78
Development standards for making housing accessible to persons with disabilities?	8	16	12	42	78
A process by which persons with disabilities can request modification to the jurisdiction's policies?	8	14	15	41	78
Standards for the development of senior housing?	5	21	11	41	78
Guidelines that distinguish senior citizen housing from other residential uses?	3	22	12	41	78
Guidelines for developing housing for any other special needs populations?	4	20	13	41	78
Fair Housing Policies					
A fair housing ordinance, policy, or regulation?	7	15	13	43	78
Policies or practices for "affirmatively furthering fair housing"?	7	15	12	44	78

I. IMPEDIMENTS

The 2013 Northeast Ohio Regional Analysis of Impediments to Fair Housing Choice uncovered several potential issues regarding fair housing in the Youngstown-Warren Housing Market Area. Identification of these items as probable impediments to fair housing choice was based on HUD's definition of impediments as actions, omissions, or decisions that restrict housing choice due to protected class status or actions, omissions, or decisions that have this effect. The identified impediments are supported by evidence uncovered during the Regional AI process, with impediments of higher need being those identified in multiple sources.

These probable impediments in the entirety of the Northeast Ohio Region are presented in **Volumes I and II** of the Regional AI. They are accompanied by suggested actions that jurisdictions in the Region may implement in order to alleviate or eliminate these impediments, and are accompanied by measurable objectives. The goal of these actions and measurable objectives is to assist these agencies in offering greater housing choice for all citizens of the Northeast Ohio Region.

The following list presents the private and public sector impediments found in the Youngstown-Warren Housing Market Area.

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.

IMPEDIMENTS MATRIX

The matrix on the following page includes the impediment, data source, or sources that indicated its existence, protected classes most affected, and ranking of need for action. Level of need for action was determined based on the number of data sources that identified each impediment.

Table 10.I.1
Impediments Matrix
 10. Youngstown-Warren Housing Market Area
 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 ⁴⁸		
Private Sector												
1	Denial of available housing units in the rental markets		X				X	X			Black and Hispanic persons	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			Disabled persons	L
Public Sector												
1	Lack of sufficient fair housing policies or practices by several units of local government							X			All	L
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	All	M
5	Decisions regarding definitions of "family," "dwelling unit," and related terms									X	Disabled persons, families	L
6	Lack of inclusionary policies							X		X	All	M

⁴⁸ 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.

11. ASHTABULA COUNTY

A. CENSUS BUREAU DATA

This section contains additional data from the U.S. Census Bureau.

Table 11.A.1
Population by Age
11. Ashtabula County
2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Under 5	6,725	6.5%	6,326	6.2%	-5.9%
5 to 19	22,708	22.1%	20,188	19.9%	-11.1%
20 to 24	5,233	5.1%	5,500	5.4%	5.1%
25 to 34	12,724	12.4%	11,052	10.9%	-13.1%
35 to 54	30,458	29.6%	28,905	28.5%	-5.1%
55 to 64	9,829	9.6%	13,649	13.4%	38.9%
65 or Older	15,051	14.7%	15,877	15.6%	5.5%
Total	102,728	100.0%	101,497	100.0%	-1.2%

Table 11.A.2
Elderly Population by Age
11. Ashtabula County
2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
65 to 66	1,597	10.6%	2,022	12.7%	26.6%
67 to 69	2,356	15.7%	2,869	18.1%	21.8%
70 to 74	3,882	25.8%	3,547	22.3%	-8.6%
75 to 79	3,141	20.9%	2,854	18.0%	-9.1%
80 to 84	2,261	15.0%	2,275	14.3%	.6%
85 or Older	1,814	12.1%	2,310	14.5%	27.3%
Total	15,051	100.0%	15,877	100.0%	5.5%

Table 11.A.3
Population by Race and Ethnicity
11. Ashtabula County
2000 & 2010 Census SF1 Data

Race	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
White	96,635	94.1%	94,041	92.7%	-2.7%
Black	3,247	3.2%	3,586	3.5%	10.4%
American Indian	195	.2%	241	.2%	23.6%
Asian	346	.3%	375	.4%	8.4%
Native Hawaiian/ Pacific Islander	25	.0%	22	.0%	-12.0%
Other	878	.9%	1,086	1.1%	23.7%
Two or More Races	1,402	1.4%	2,146	2.1%	53.1%
Total	102,728	100.0%	101,497	100.0%	-1.2%
Non-Hispanic	100,436	97.8	98,056	96.6%	-2.4%
Hispanic	2,292	2.2%	3,441	3.4%	50.1%

Table 11.A.4
Disability by Age
 11. Ashtabula County
 2010 Three-Year ACS Data

Age	Male		Female		Total	
	Disabled Population	Disability Rate	Disabled Population	Disability Rate	Disabled Population	Disability Rate
Under 5	0	.0%	60	1.9%	60	1.0%
5 to 17	696	7.8%	491	5.4%	1,187	6.6%
18 to 34	764	8.6%	584	6.3%	1,348	7.4%
35 to 64	3,035	14.7%	3,103	14.9%	6,138	14.8%
65 to 74	1,108	28.9%	994	24.1%	2,102	26.4%
75 or Older	1,340	47.8%	1,903	46.0%	3,243	46.7%
Total	6,943	14.4%	7,135	14.1%	14,078	14.3%

Table 11.A.5
Employment Status by Disability and Type: Age 18 to 64
 11. Ashtabula County
 2010 Three-Year ACS Data

Disability Status	Population
Employed:	40,315
With a disability:	2,093
With a hearing difficulty	771
With a vision difficulty	600
With a cognitive difficulty	609
With an ambulatory difficulty	846
With a self-care difficulty	317
With an independent living difficulty	511
No disability	38,222
Unemployed:	5,135
With a disability:	428
With a hearing difficulty	112
With a vision difficulty	14
With a cognitive difficulty	329
With an ambulatory difficulty	86
With a self-care difficulty	33
With an independent living difficulty	67
No disability	4,707
Not in labor force:	14,111
With a disability:	4,965
With a hearing difficulty	1,114
With a vision difficulty	1,042
With a cognitive difficulty	2,270
With an ambulatory difficulty	2,912
With a self-care difficulty	1,147
With an independent living difficulty	2,611
No disability	9,146
Total	59,561

Table 11.A.6**Households by Income**

11. Ashtabula County

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	6,836	17.3%	6,325	16.3%
\$15,000 to \$19,999	3,156	8.0%	2,798	7.2%
\$20,000 to \$24,999	3,252	8.2%	2,599	6.7%
\$25,000 to \$34,999	6,132	15.5%	4,671	12.0%
\$35,000 to \$49,999	7,370	18.7%	6,537	16.8%
\$50,000 to \$74,999	7,678	19.5%	8,002	20.6%
\$75,000 to \$99,999	3,082	7.8%	4,184	10.8%
\$100,000 or More	1,931	4.9%	3,795	9.8%
Total	39,437	100.0%	38,911	100.0%

Table 11.A.7**Poverty by Age**

11. Ashtabula County

2000 Census SF3 & 2010 Five-Year ACS Data

Age	2000 Census		2010 Five-Year ACS	
	Persons in Poverty	% of Total	Persons in Poverty	% of Total
Under 6	1,619	13.3%	1,979	12.8%
6 to 17	2,968	24.4%	3,212	20.8%
18 to 64	6,363	52.3%	8,891	57.6%
65 or Older	1,212	10.0%	1,365	8.8%
Total	12,162	100.0%	15,447	100.0%
Poverty Rate	12.1%	.	15.7%	.

Table 11.A.8**Households by Year Home Built**

11. Ashtabula County

2000 Census SF3 & 2010 Five-Year ACS Data

Year Built	2000 Census		2010 Five-Year ACS	
	Households	% of Total	Households	% of Total
1939 or Earlier	12,462	31.6%	12,597	32.4%
1940 to 1949	3,958	10.0%	2,839	7.3%
1950 to 1959	5,581	14.2%	5,280	13.6%
1960 to 1969	4,223	10.7%	3,514	9.0%
1970 to 1979	6,329	16.1%	5,391	13.9%
1980 to 1989	2,704	6.9%	2,259	5.8%
1990 to 1999	4,140	10.5%	4,052	10.4%
2000 to 2004	.	.	2,240	5.8%
2005 or Later	.	.	739	1.9%
Total	39,397	100.0%	38,911	100.0%

Table 11.A.9**Housing Units by Type**

11. Ashtabula County

2000 Census SF3 & 2010 Five-Year ACS Data

Unit Type	2000 Census		2010 Five-Year ACS	
	Units	% of Total	Units	% of Total
Single-Family	33,247	75.9%	35,704	77.5%
Duplex	2,189	5.0%	2,009	4.4%
Tri- or Four-Plex	1,436	3.3%	1,534	3.3%
Apartment	2,937	6.7%	3,430	7.4%
Mobile Home	3,912	8.9%	3,359	7.3%
Boat, RV, Van, Etc.	71	.2%	18	.0%
Total	43,792	100.0%	46,054	100.0%

Table 11.A.10**Housing Units by Tenure**

11. Ashtabula County

2000 & 2010 Census SF1 Data

Tenure	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
Occupied Housing Units	39,397	90.0%	39,363	85.4%	-.1%
Owner-Occupied	29,188	74.1%	28,269	71.8%	-3.1%
Renter-Occupied	10,209	25.9%	11,094	28.2%	8.7%
Vacant Housing Units	4,395	10.0%	6,736	14.6%	53.3%
Total Housing Units	43,792	100.0%	46,099	100.0%	5.3%

Table 11.A.11**Disposition of Vacant Housing Units**

11. Ashtabula County

2000 & 2010 Census SF1 Data

Disposition	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
For Rent	841	19.1%	1,256	18.6%	49.3%
For Sale	538	12.2%	842	12.5%	56.5%
Rented or Sold, Not Occupied	554	12.6%	343	5.1%	-38.1%
For Seasonal, Recreational, or Occasional Use	1,906	43.4%	2,449	36.4%	28.5%
For Migrant Workers	1	0.0%	2	.0%	100.0%
Other Vacant	555	12.6%	1,844	27.4%	232.3%
Total	4,395	100.0%	6,736	100.0%	53.3%

Table 11.A.12**Households by Household Size**

11. Ashtabula County

2000 & 2010 Census SF1 Data

Size	2000 Census		2010 Census		% Change 00-10
	Households	% of Total	Households	% of Total	
One Person	9,783	24.8%	10,607	26.9%	8.4%
Two Persons	13,585	34.5%	13,895	35.3%	2.3%
Three Persons	6,561	16.7%	6,206	15.8%	-5.4%
Four Persons	5,585	14.2%	4,799	12.2%	-14.1%
Five Persons	2,452	6.2%	2,315	5.9%	-5.6%
Six Persons	880	2.2%	921	2.3%	4.7%
Seven Persons or More	551	1.4%	620	1.6%	12.5%
Total	39,397	100.0%	39,363	100.0%	-.1%

Table 11.A.13
Household Type by Tenure
 11. Ashtabula County
 2000 & 2010 Census SF1 Data

Household Type	2000 Census		2010 Census		% Change 00–10
	Households	% of Total	Households	% of Total	
Family Households	27,768	70.5%	26,495	67.3%	-4.6%
Married-Couple Family	21,581	77.7%	19,353	73.0%	-10.3%
Owner-Occupied	18,572	86.1%	16,621	85.9%	-10.5%
Renter-Occupied	3,009	13.9%	2,732	14.1%	-9.2%
Other Family	6,187	22.3%	7,142	27.0%	15.4%
Male Householder, No Spouse	1,709	27.6%	2,257	31.6%	32.1%
Owner-Occupied	1,128	66.0%	1,414	62.6%	25.4%
Renter-Occupied	581	34.0%	843	37.4%	45.1%
Female Householder, No Spouse	4,478	72.4%	4,885	68.4%	9.1%
Owner-Occupied	2,438	54.4%	2,462	50.4%	1.0%
Renter-Occupied	2,040	45.6%	2,423	49.6%	18.8%
Non-Family Households	11,629	29.5%	12,868	32.7%	10.7%
Owner-Occupied	7,050	60.6%	7,772	60.4%	10.2%
Renter-Occupied	4,579	39.4%	5,096	39.6%	11.3%
Total	39,397	100.0%	39,363	100.0%	-.1%

Table 11.A.14
Group Quarters Population
 11. Ashtabula County
 2000 & 2010 Census SF1 Data

Group Quarters Type	2000 Census		2010 Census		% Change 00-10
	Population	% of Total	Population	% of Total	
Institutionalized					
Correctional Institutions	98	7.3%	1,536	52.1%	1467.3%
Juvenile Facilities	.	.	14	.5%	.
Nursing Homes	1,218	90.2%	1,255	42.5%	3.0%
Other Institutions	35	2.6%	145	4.9%	314.3%
Total	1,351	100.0%	2,950	100.0%	118.4%
Noninstitutionalized					
College Dormitories	0	.0%	0	.0%	%
Military Quarters	0	.0%	0	.0%	%
Other Noninstitutional	414	100.0%	240	100.0%	-42.0%
Total	414	23.5%	240	7.5%	-42.0%
Total Group Quarters Population	1,765	100.0%	3,190	100.0%	80.7%

Table 11.A.15
Overcrowding and Severe Overcrowding
 11. Ashtabula County
 2000 Census SF3 & 2010 Five-Year ACS Data

2000 Census GPO & 2010 Five Year ACS Data							
Data Source	No Overcrowding		Overcrowding		Severe Overcrowding		Total
	Households	% of Total	Households	% of Total	Households	% of Total	
Owner							
2000 Census	28,754	98.5%	322	1.1%	111	.4%	29,187
2010 ACS	27,917	98.6%	328	1.2%	66	.2%	28,311
Renter							
2000 Census	9,881	96.8%	224	2.2%	105	1.0%	10,210
2010 ACS	10,324	97.4%	173	1.6%	103	1.0%	10,600
Total							
2000 Census	38,635	98.1%	546	1.4%	216	.5%	39,397
2010 ACS	38,241	98.3%	501	1.3%	169	.4%	38,911

Table 11.A.16
Households with Incomplete Plumbing Facilities
 11. Ashtabula County
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Plumbing Facilities	39,147	38,597
Lacking Complete Plumbing Facilities	250	314
Total Households	39,397	38,911
Percent Lacking	.6%	.8%

Table 11.A.17
Households with Incomplete Kitchen Facilities
 11. Ashtabula County
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Kitchen Facilities	39,089	38,301
Lacking Complete Kitchen Facilities	308	610
Total Households	39,397	38,911
Percent Lacking	.8%	1.6%

Table 11.A.18
Cost Burden and Severe Cost Burden by Tenure
 11. Ashtabula County
 2000 Census & 2010 Five-Year ACS Data

2000 Census & 2010 Five-Year ACS Data									
Data Source	Less Than 30%		31%-50%		Above 50%		Not Computed		Total
	Households	% of Total	Households	% of Total	Households	% of Total	Households	% of Total	
Owner With a Mortgage									
2000 Census	10,309	74.6%	2,344	17.0%	1,128	8.2%	36	.3%	13,817
2010 ACS	12,180	67.1%	3,630	20.0%	2,255	12.4%	91	.5%	18,156
Owner Without a Mortgage									
2000 Census	6,995	89.7%	479	6.1%	195	2.5%	130	1.7%	7,799
2010 ACS	8,388	82.6%	1,085	10.7%	616	6.1%	66	.6%	10,155
Renter									
2000 Census	5,712	58.4%	1,867	19.1%	1,310	13.4%	887	9.1%	9,776
2010 ACS	4,542	42.8%	2,291	21.6%	2,616	24.7%	1,151	10.9%	10,600
Total									
2000 Census	23,016	73.3%	4,690	14.9%	2,633	8.4%	1,053	3.4%	31,392
2010 ACS	25,110	64.5%	7,006	18.0%	5,487	14.1%	1,308	3.4%	38,911

Table 11.A.19
Median Housing Costs
 11. Ashtabula County
 2000 Census SF3 & 2010 Five-Year ACS Data

Housing Cost	2000 Census	2010 ACS
Median Contract Rent	\$374	\$464
Median Home Value	\$85,300	\$118,500

B. BEA DATA

This section contains additional Bureau of Economic Analysis (BEA) data that address employment and income.

Table 11.B.1
Employment by Industry
 11. Ashtabula County
 Select Years 2001–2010 BEA Data

NAICS Categories	2001	2005	2006	2007	2008	2009	2010	% Change 01–10
Farm employment	1,484	1,263	1,242	1,239	1,165	1,173	1,165	-21.5%
Forestry, fishing, related activities, and other	(D) ⁴⁹	193	186	200	207	203	207	.
Mining	143	144	182	205	267	255	271	89.5%
Utilities	297	259	252	257	275	263	266	-10.4%
Construction	3,194	3,539	3,380	3,388	3,224	3,116	3,009	-5.8%
Manufacturing	9,917	8,870	8,666	8,068	7,913	6,552	6,752	-31.9%
Wholesale trade	952	995	962	994	973	851	816	-14.3%
Retail trade	5,654	5,979	5,986	5,929	5,698	5,370	5,267	-6.8%
Transportation and warehousing	1,318	1,360	1,481	1,561	1,543	1,574	1,527	15.9%
Information	591	547	532	522	503	456	453	-23.4%
Finance and insurance	1,160	1,085	1,091	1,141	1,200	1,247	1,300	12.1%
Real estate and rental and leasing	1,555	1,775	1,725	1,676	1,645	1,625	1,601	3.0%
Professional and technical services	(D)	(D)	1,338	1,384	1,368	1,305	1,313	.
Management of companies and enterprises	(D)	(D)	207	227	295	195	174	.
Administrative and waste services	1,704	2,166	1,888	1,876	1,930	1,939	2,308	35.4%
Educational services	515	547	503	464	478	486	521	1.2%
Health care and social assistance	5,276	5,762	5,865	6,187	6,346	6,354	6,282	19.1%
Arts, entertainment, and recreation	743	738	728	696	746	682	686	-7.7%
Accommodation and food services	3,201	3,458	3,187	3,154	3,037	2,882	2,937	-8.2%
Other services, except public administration	2,584	2,688	2,700	2,695	2,799	2,744	2,754	6.6%
Government and government enterprises	5,828	5,640	5,605	5,646	5,486	5,384	5,308	-8.9%
Total	47,684	48,449	47,706	47,509	47,098	44,656	44,917	-5.8%

⁴⁹ (D): These data are not shown to avoid disclosure of confidential information, but estimates are included in the totals.

Table 11.B.2
Real Earnings by Industry

11. Ashtabula County
 Select Years 2001–2010 BEA Data, Real 2011 Dollars

NAICS Categories	2001	2005	2006	2007	2008	2009	2010	% Change 00–10
Farm earnings	6,192	11,702	8,008	11,266	13,204	13,072	8,153	31.7%
Forestry, fishing, related activities, and other	(D) ⁵⁰	3,883	3,957	4,349	3,519	2,766	2,726	.
Mining	3,867	7,346	9,512	9,369	7,141	3,208	3,104	-19.7%
Utilities	26,276	26,715	25,980	25,552	29,587	27,012	27,294	3.9%
Construction	102,336	109,746	101,054	88,995	80,585	88,295	89,356	-12.7%
Manufacturing	520,551	504,773	477,059	443,635	442,539	369,152	393,722	-24.4%
Wholesale trade	39,337	41,294	42,013	45,373	46,109	38,490	37,435	-4.8%
Retail trade	124,548	130,914	129,147	129,102	123,638	120,166	120,140	-3.5%
Transportation and warehousing	66,606	62,510	63,780	64,711	64,255	63,423	62,850	-5.6%
Information	22,712	19,373	18,909	18,474	18,128	17,405	15,915	-29.9%
Finance and insurance	37,894	37,261	36,708	38,280	38,448	34,050	33,843	-10.7%
Real estate and rental and leasing	19,174	13,303	14,243	11,069	15,604	15,964	16,929	-11.7%
Professional and technical services	(D)	(D)	30,546	30,705	33,186	32,448	34,126	.
Management of companies and enterprises	(D)	(D)	6,818	6,635	9,775	9,840	5,915	.
Administrative and waste services	28,052	43,973	35,262	34,831	33,296	32,040	40,509	44.4%
Educational services	6,040	6,269	6,394	6,265	6,449	6,403	6,799	12.6%
Health care and social assistance	188,081	209,481	215,589	222,292	233,086	236,902	231,208	22.9%
Arts, entertainment, and recreation	6,132	5,168	5,136	4,682	4,039	3,762	4,653	-24.1%
Accommodation and food services	44,900	49,609	45,330	47,433	44,329	43,652	44,803	-.2%
Other services, except public administration	71,129	80,226	78,560	76,384	73,953	71,270	73,410	3.2%
Government and government enterprises	263,173	279,433	274,912	271,976	265,757	271,050	268,560	2.0%
Total	1,615,183	1,676,072	1,628,917	1,591,376	1,586,627	1,500,370	1,521,451	-5.8%

⁵⁰ (D): These data are not shown to avoid disclosure of confidential information, but estimates are included in the totals.

Table 11.B.3
Real Earnings Per Job by Industry
 11. Ashtabula County
 Select Years 2001–2010 BEA Data, 1,000's of Real 2011 Dollars

NAICS Categories	2001	2005	2006	2007	2008	2009	2010	% Change 00–10
Farm earnings	4,173	9,265	6,447	9,093	11,334	11,144	6,999	67.7%
Forestry, fishing, related activities, and other	(D) ⁵¹	20,117	21,272	21,743	17,002	13,624	13,169	.
Mining	27,043	51,012	52,264	45,700	26,745	12,580	11,453	-57.6%
Utilities	88,473	103,145	103,093	99,424	107,590	102,709	102,611	16.0%
Construction	32,040	31,010	29,898	26,268	24,995	28,336	29,696	-7.3%
Manufacturing	52,491	56,908	55,050	54,987	55,926	56,342	58,312	11.1%
Wholesale trade	41,321	41,502	43,673	45,647	47,388	45,229	45,877	11.0%
Retail trade	22,028	21,896	21,575	21,775	21,699	22,377	22,810	3.5%
Transportation and warehousing	50,535	45,963	43,066	41,455	41,643	40,294	41,159	-18.6%
Information	38,429	35,418	35,543	35,390	36,040	38,168	35,132	-8.6%
Finance and insurance	32,667	34,342	33,646	33,550	32,040	27,305	26,033	-20.3%
Real estate and rental and leasing	12,331	7,495	8,257	6,604	9,486	9,824	10,574	-14.2%
Professional and technical services	(D)	(D)	22,829	22,186	24,259	24,864	25,991	.
Management of companies and enterprises	(D)	(D)	32,939	29,227	33,136	50,463	33,992	.
Administrative and waste services	16,462	20,301	18,677	18,567	17,252	16,524	17,551	6.6%
Educational services	11,728	11,460	12,713	13,503	13,491	13,175	13,050	11.3%
Health care and social assistance	35,648	36,356	36,759	35,929	36,730	37,284	36,805	3.2%
Arts, entertainment, and recreation	8,254	7,003	7,055	6,726	5,415	5,515	6,783	-17.8%
Accommodation and food services	14,027	14,346	14,223	15,039	14,596	15,146	15,255	8.8%
Other services, except public administration	27,527	29,846	29,096	28,343	26,421	25,973	26,656	-3.2%
Government and government enterprises	45,157	49,545	49,048	48,171	48,443	50,344	50,595	12.0%
Average	33,873	34,594	34,145	33,496	33,688	33,598	33,873	.00%

⁵¹ (D): These data are not shown to avoid disclosure of confidential information, but estimates are included in the totals.

Table 11.B.4
Total Employment and Real Personal Income
 11. Ashtabula County
 1969–2010 BEA Data, 2011 Dollars

Year	1,000s of 2011 Dollars						Per Capita Income	Total Employment	Real Average Earnings Per Job
	Earnings	Social Security Contributions	Residents Adjustments	Dividends, Interest, Rents	Transfer Payments	Personal Income			
1969	1,291,758	93,596	121,525	175,894	144,007	1,639,589	16,784	38,425	33,618
1970	1,270,279	90,477	119,826	184,313	158,010	1,641,951	16,647	38,210	33,243
1971	1,293,772	94,703	125,370	190,962	179,229	1,694,630	16,835	38,309	33,772
1972	1,296,042	98,855	137,545	197,001	192,782	1,724,514	17,104	37,851	34,242
1973	1,384,667	120,198	154,385	207,596	211,013	1,837,463	18,296	39,442	35,105
1974	1,409,001	127,050	162,026	217,580	224,816	1,886,373	18,653	41,011	34,356
1975	1,268,444	110,756	166,267	214,458	268,501	1,806,915	17,714	38,492	32,954
1976	1,349,382	119,221	180,179	214,888	274,193	1,899,421	18,779	39,603	34,073
1977	1,421,851	128,048	192,254	225,351	269,543	1,980,951	19,508	41,200	34,510
1978	1,497,030	137,858	213,052	241,056	273,906	2,087,185	20,365	42,533	35,196
1979	1,508,091	143,390	239,244	256,267	289,477	2,149,689	20,717	41,983	35,923
1980	1,407,305	134,180	239,597	295,700	331,008	2,139,430	20,568	41,272	34,098
1981	1,361,995	137,272	240,962	329,502	343,325	2,138,513	20,764	39,712	34,297
1982	1,235,966	124,869	237,263	340,402	392,879	2,081,641	20,222	37,397	33,050
1983	1,201,559	123,657	246,761	358,940	404,188	2,087,791	20,477	36,954	32,515
1984	1,302,352	137,922	264,985	388,280	397,816	2,215,511	21,853	38,434	33,885
1985	1,303,414	140,682	264,894	394,299	418,213	2,240,138	22,231	38,876	33,527
1986	1,331,644	148,445	258,977	399,851	434,686	2,276,713	22,722	39,580	33,644
1987	1,310,821	146,160	268,842	381,584	439,577	2,254,665	22,578	39,625	33,080
1988	1,311,277	150,905	285,296	382,718	441,375	2,269,761	22,714	39,628	33,089
1989	1,291,136	150,150	307,225	392,919	456,978	2,298,108	23,059	40,489	31,888
1990	1,284,502	150,518	331,844	400,958	485,098	2,351,884	23,520	40,180	31,968
1991	1,271,934	151,388	317,217	372,308	505,628	2,315,698	23,098	40,191	31,648
1992	1,313,354	155,257	336,083	371,569	531,226	2,396,974	23,814	40,586	32,359
1993	1,372,223	163,873	335,046	362,023	544,016	2,449,433	24,230	41,991	32,679
1994	1,446,738	174,562	349,393	377,065	556,857	2,555,491	25,182	43,689	33,115
1995	1,448,835	178,419	362,101	395,805	567,638	2,595,959	25,496	44,713	32,403
1996	1,498,208	181,178	349,835	409,146	592,313	2,668,325	26,127	45,744	32,752
1997	1,511,536	178,793	418,219	447,104	595,402	2,793,468	27,199	46,149	32,754
1998	1,612,496	183,870	406,865	465,041	595,418	2,895,949	28,161	48,096	33,527
1999	1,651,045	186,099	410,999	455,375	608,673	2,939,992	28,601	48,829	33,813
2000	1,624,991	177,952	451,982	462,457	627,108	2,988,587	29,098	49,012	33,155
2001	1,615,183	178,000	445,415	450,785	672,844	3,006,227	29,344	47,684	33,873
2002	1,647,925	175,716	435,619	428,306	708,145	3,044,278	29,678	47,477	34,709
2003	1,670,835	178,422	456,346	407,200	727,231	3,083,190	30,031	47,336	35,297
2004	1,701,843	186,286	446,510	359,545	742,779	3,064,391	29,853	48,266	35,259
2005	1,676,072	187,117	452,772	331,626	760,843	3,034,196	29,562	48,449	34,594
2006	1,628,917	184,432	455,042	343,933	773,151	3,016,611	29,476	47,706	34,145
2007	1,591,376	181,987	451,663	383,942	803,008	3,048,002	29,837	47,509	33,496
2008	1,586,627	187,651	436,660	418,670	844,533	3,098,840	30,433	47,098	33,688
2009	1,500,370	182,513	382,406	337,625	951,603	2,989,491	29,429	44,656	33,598
2010	1,521,451	186,092	400,826	342,661	972,801	3,051,648	30,076	44,917	33,873

C. BLS DATA

This section contains Bureau of Labor Statistics (BLS) data that address employment and income.

Table 11.C.1
Labor Force Statistics
11. Ashtabula County
1990–2011 BLS Data

Year	Labor Force	Employment	Unemployment	Unemployment Rate	Statewide Unemployment Rate
1990	45,523	42,054	3,469	7.6%	5.7%
1991	45,447	41,352	4,095	9.0%	6.6%
1992	45,754	41,156	4,598	10.0%	7.4%
1993	45,248	41,313	3,935	8.7%	6.7%
1994	45,902	42,224	3,678	8.0%	5.6%
1995	45,599	42,458	3,141	6.9%	4.9%
1996	46,493	43,086	3,407	7.3%	5.0%
1997	46,713	43,798	2,915	6.2%	4.6%
1998	47,138	44,107	3,031	6.4%	4.3%
1999	47,184	44,403	2,781	5.9%	4.3%
2000	50,545	48,105	2,440	4.8%	4.0%
2001	49,544	46,567	2,977	6.0%	4.4%
2002	50,483	46,777	3,706	7.3%	5.7%
2003	50,097	46,200	3,897	7.8%	6.2%
2004	50,042	46,421	3,621	7.2%	6.1%
2005	50,344	46,775	3,569	7.1%	5.9%
2006	49,641	46,381	3,260	6.6%	5.4%
2007	49,217	45,799	3,418	6.9%	5.6%
2008	48,661	44,790	3,871	8.0%	6.5%
2009	48,571	42,139	6,432	13.2%	10.1%
2010	48,457	42,358	6,099	12.6%	10.0%
2011	47,509	42,454	5,055	10.6%	8.6%

D. HMDA DATA

The Home Mortgage Disclosure Act (HMDA) requires both depository and non-depository lenders to collect and publicly disclose information about housing-related loans and loan applications.⁵² The information presented in this section presents detailed HMDA data, including denial rates and predatory lending including high annual percentage rate (APR) loans.

Table 11.D.1
Purpose of Loan by Year
11. Ashtabula County
2004–2011 HMDA Data

Purpose	2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	2,367	2,939	2,824	1,876	1,231	1,042	978	1,093	14,350
Home Improvement	875	1,129	1,109	866	487	291	251	281	5,289
Refinancing	6,532	6,399	5,658	3,763	2,542	2,370	2,056	2,016	31,336
Total	9,774	10,467	9,591	6,505	4,260	3,703	3,285	3,390	50,975

Table 11.D.2
Occupancy Status for Home Purchase Loan Applications
11. Ashtabula County
2004–2011 HMDA Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	Total
Owner-Occupied	2,072	2,566	2,460	1,563	1,085	949	875	981	12,551
Not Owner-Occupied	192	296	272	220	128	79	96	108	1,391
Not Applicable	103	77	92	93	18	14	7	4	408
Total	2,367	2,939	2,824	1,876	1,231	1,042	978	1,093	14,350

Table 11.D.3
Owner-Occupied Home Purchase Loan Applications by Loan Type
11. Ashtabula County
2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Conventional	1,696	2,260	2,116	1,207	449	261	240	393	8,622
FHA - Insured	302	231	294	289	500	469	420	346	2,851
VA - Guaranteed	33	44	32	38	43	45	51	57	343
Rural Housing Service or Farm Service Agency	41	31	18	29	93	174	164	185	735
Total	2,072	2,566	2,460	1,563	1,085	949	875	981	12,551

⁵² Data are considered “raw” because they contain entry errors and incomplete loan applications. Starting in 2004, the HMDA data made substantive changes in reporting. It modified the way it handled Hispanic data, loan interest rates, and the reporting of multifamily loan applications.

DENIAL RATES

Table 11.D.4
Loan Applications by Action Taken
 11. Ashtabula County
 2004–2011 HMDA Data

Action	2004	2005	2006	2007	2008	2009	2010	2011	Total
Loan Originated	1,046	1,279	1,136	797	530	389	371	459	6,007
Application Approved but not Accepted	126	172	157	82	51	35	15	25	663
Application Denied	307	390	394	252	172	130	114	115	1,874
Application Withdrawn by Applicant	159	173	144	88	63	40	43	58	768
File Closed for Incompleteness	34	61	50	20	14	10	9	7	205
Loan Purchased by the Institution	400	489	577	323	255	345	323	317	3,029
Preapproval Request Denied	0	2	2	1	0	0	0	0	5
Preapproval Approved but not Accepted	0	0	0	0	0	0	0	0	0
Total	2,072	2,566	2,460	1,563	1,085	949	875	981	12,551
Denial Rate	22.7%	23.4%	25.8%	24.0%	24.5%	25.0%	23.5%	20.0%	23.8%

Table 11.D.5
Denial Rates by Gender of Applicant
 11. Ashtabula County
 2004–2011 HMDA Data

Year	Male	Female	Not Available	Not Applicable	Average
2004	20.0%	25.6%	41.0%	%	22.7%
2005	21.6%	28.1%	22.6%	%	23.4%
2006	24.8%	26.9%	32.5%	%	25.8%
2007	20.7%	28.5%	39.0%	%	24.0%
2008	24.5%	21.3%	50.0%	%	24.5%
2009	23.5%	25.5%	50.0%	%	25.0%
2010	23.0%	21.2%	38.7%	%	23.5%
2011	19.0%	16.2%	50.0%	100.0%	20.0%
Average	22.1%	25.5%	35.9%	100.0%	23.8%

Table 11.D.6
Loan Applications by Selected Action Taken by Gender of Applicant
 11. Ashtabula County
 2004–2011 HMDA Data

Gender		2004	2005	2006	2007	2008	2009	2010	2011	Total
Male	Originated	735	885	778	540	363	277	248	336	4,162
	Denied	184	244	256	141	118	85	74	79	1,181
	Denial Rate	20.0%	21.6%	24.8%	20.7%	24.5%	23.5%	23.0%	19.0%	22.1%
Female	Originated	265	312	302	221	155	102	104	109	1,570
	Denied	91	122	111	88	42	35	28	21	538
	Denial Rate	25.6%	28.1%	26.9%	28.5%	21.3%	25.5%	21.2%	16.2%	25.5%
Not Available	Originated	46	82	56	36	12	10	19	14	275
	Denied	32	24	27	23	12	10	12	14	154
	Denial Rate	41.0%	22.6%	32.5%	39.0%	50.0%	50.0%	38.7%	50.0%	35.9%
Not Applicable	Originated	0	0	0	0	0	0	0	0	0
	Denied	0	0	0	0	0	0	0	1	1
	Denial Rate	%	%	%	%	%	%	%	100.0%	100.0%
Total	Originated	1,046	1,279	1,136	797	530	389	371	459	6,007
	Denied	307	390	394	252	172	130	114	115	1,874
	Denial Rate	22.7%	23.4%	25.8%	24.0%	24.5%	25.0%	23.5%	20.0%	23.8%

Table 11.D.7
Denial Rates by Race/Ethnicity of Applicant
 11. Ashtabula County
 2004–2011 HMDA Data

Race/Ethnicity	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	80.0%	50.0%	100.0%	50.0%	66.7%	.0%	.0%	.0%	46.4%
Asian	41.7%	9.1%	71.4%	28.6%	.0%	100.0%	.0%	%	35.6%
Black	41.7%	30.8%	44.4%	27.3%	28.6%	100.0%	20.0%	50.0%	37.2%
White	20.3%	23.1%	23.8%	22.1%	22.7%	23.6%	22.2%	18.1%	22.2%
Not Available	37.8%	24.5%	37.2%	41.8%	40.0%	38.5%	39.1%	40.0%	34.9%
Not Applicable	.0%	%	%	%	%	0%	0%	100.0%	50.0%
Average	22.7%	23.4%	25.8%	24.0%	24.5%	25.0%	23.5%	20.0%	23.8%
Non-Hispanic	21.0%	22.9%	24.4%	21.8%	23.1%	24.4%	21.8%	17.7%	22.4%
Hispanic	20.0%	33.3%	38.7%	44.4%	22.2%	20.0%	14.3%	42.9%	30.1%

Table 11.D.8
Loan Applications by Selected Action Taken by Race/Ethnicity of Applicant
 11. Ashtabula County
 2004–2011 HMDA Data

Race		2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Originated	1	3	0	1	2	1	4	3	15
	Denied	4	3	1	1	4	0	0	0	13
	Denial Rate	80.0%	50.0%	100.0%	50.0%	66.7%	.0%	.0%	.0%	46.4%
Asian	Originated	7	10	2	5	4	0	1	0	29
	Denied	5	1	5	2	0	3	0	0	16
	Denial Rate	41.7%	9.1%	71.4%	28.6%	.0%	100.0%	.0%	%	35.6%
Black	Originated	14	18	20	16	5	0	8	5	86
	Denied	10	8	16	6	2	2	2	5	51
	Denial Rate	41.7%	30.8%	44.4%	27.3%	28.6%	100.0%	20.0%	50.0%	37.2%
White	Originated	944	1,097	1,028	722	483	372	330	430	5,406
	Denied	240	329	321	205	142	115	94	95	1,541
	Denial Rate	20.3%	23.1%	23.8%	22.1%	22.7%	23.6%	22.2%	18.1%	22.2%
Not Available	Originated	79	151	86	53	36	16	28	21	470
	Denied	48	49	51	38	24	10	18	14	252
	Denial Rate	37.8%	24.5%	37.2%	41.8%	40.0%	38.5%	39.1%	40.0%	34.9%
Not Applicable	Originated	1	0	0	0	0	0	0	0	1
	Denied	0	0	0	0	0	0	0	1	1
	Denial Rate	37.8%	24.5%	37.2%	41.8%	40.0%	38.5%	39.1%	40.0%	50.0%
Total	Originated	1,046	1,279	1,136	797	530	389	371	459	6,007
	Denied	307	390	394	252	172	130	114	115	1,874
	Denial Rate	22.7%	23.4%	25.8%	24.0%	24.5%	25.0%	23.5%	20.0%	23.8%
Non-Hispanic	Originated	844	1,096	1,033	737	483	357	338	432	5,320
	Denied	224	325	333	205	145	115	94	93	1,534
	Denial Rate	21.0%	22.9%	24.4%	21.8%	23.1%	24.4%	21.8%	17.7%	22.4%
Hispanic	Originated	24	18	19	10	14	12	6	4	107
	Denied	6	9	12	8	4	3	1	3	46
	Denial Rate	20.0%	33.3%	38.7%	44.4%	22.2%	20.0%	14.3%	42.9%	30.1%

Table 11.D.9
Loan Applications by Reason for Denial
 11. Ashtabula County
 2004–2011 HMDA Data

Denial Reason	2004	2005	2006	2007	2008	2009	2010	2011	Total
Debt-to-Income Ratio	34	58	43	31	22	21	18	16	243
Employment History	1	7	6	2	2	2	2	1	23
Credit History	67	87	81	46	37	38	43	22	421
Collateral	30	39	43	28	35	32	19	39	265
Insufficient Cash	11	5	12	2	2	0	1	1	34
Unverifiable Information	5	9	8	5	8	1	4	4	44
Credit Application Incomplete	31	15	28	21	14	5	5	4	123
Mortgage Insurance Denied	0	0	0	0	0	2	0	0	2
Other	54	69	48	34	9	8	9	8	239
Missing	74	101	125	83	43	21	13	20	480
Total	307	390	394	252	172	130	114	115	1,874

Table 11.D.10
Denial Rates by Income of Applicant
 11. Ashtabula County
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	78.6%	59.4%	43.3%	47.1%	60.0%	69.2%	40.0%	57.1%	56.7%
\$15,001–\$30,000	28.9%	29.0%	33.3%	33.5%	33.3%	25.0%	29.8%	21.7%	30.0%
\$30,001–\$45,000	20.9%	23.5%	25.3%	22.6%	22.4%	21.3%	22.1%	20.8%	22.8%
\$45,001–\$60,000	19.3%	21.4%	23.2%	23.1%	21.8%	22.8%	20.4%	19.2%	21.5%
\$60,001–\$75,000	18.8%	18.9%	22.0%	19.7%	19.2%	26.7%	12.5%	14.9%	19.4%
Above \$75,000	10.6%	14.9%	18.0%	15.3%	18.5%	25.7%	20.6%	17.1%	16.6%
Data Missing	31.1%	32.4%	35.1%	33.3%	.0%	60.0%	57.1%	50.0%	35.1%
Total	22.7%	23.4%	25.8%	24.0%	24.5%	25.0%	23.5%	20.0%	23.8%

Table 11.D.11
Denial Rates of Loans by Race/Ethnicity and Income of Applicant
 11. Ashtabula County
 2004–2011 HMDA Data

Race	<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	Above \$75K	Data Missing	Average
American Indian	100.0%	55.6%	40.0%	50.0%	50.0%	16.7%	100.0%	46.4%
Asian	.0%	50.0%	33.3%	21.4%	50.0%	50.0%	%	35.6%
Black	83.3%	46.7%	27.3%	40.6%	21.4%	29.4%	40.0%	37.2%
White	57.6%	28.3%	21.7%	19.4%	18.3%	15.2%	26.1%	22.2%
Not Available	41.2%	42.0%	33.2%	35.4%	26.7%	23.9%	81.0%	34.9%
Not Applicable	%	%	%	%	%	%	50.0%	50.0%
Average	56.7%	30.0%	22.8%	21.5%	19.4%	16.6%	35.1%	23.8%
Non-Hispanic Ethnicity	57.7%	28.6%	21.8%	19.8%	19.0%	15.3%	25.0%	22.4%
Hispanic (Ethnicity)	57.1%	38.5%	16.1%	22.2%	11.8%	71.4%	66.7%	30.1%

Table 11.D.12
Loan Applications by Reason for Denial by Race/Ethnicity of Applicant
 11. Ashtabula County
 2004–2011 HMDA Data

Denial Reason	American Indian	Asian	Black	White	Not Available	Not Applicable	Total	Hispanic (Ethnicity)
Debt-to-Income Ratio	2	2	8	206	25	0	243	7
Employment History	0	1	0	22	0	0	23	2
Credit History	2	5	16	354	44	0	421	16
Collateral	1	1	5	223	35	0	265	2
Insufficient Cash	0	0	0	32	2	0	34	0
Unverifiable Information	1	0	1	30	12	0	44	2
Credit Application Incomplete	2	0	1	105	15	0	123	7
Mortgage Insurance Denied	0	0	0	2	0	0	2	0
Other	0	0	7	198	33	1	239	2
Missing	5	7	13	369	86	0	480	8
Total	13	16	51	1,541	252	1	1,874	46
% Missing	38.5%	43.8%	25.5%	23.9%	34.1%	.0%	25.6%	17.4%

Table 11.D.13
Loan Applications by Income of Applicant: Originated and Denied
 11. Ashtabula County
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Loan Originated	6	13	17	9	4	4	12	3	68
	Application Denied	22	19	13	8	6	9	8	4	89
	Denial Rate	78.6%	59.4%	43.3%	47.1%	60.0%	69.2%	40.0%	57.1%	56.7%
\$15,001–\$30,000	Loan Originated	224	238	206	145	112	87	73	94	1,179
	Application Denied	91	97	103	73	56	29	31	26	506
	Denial Rate	28.9%	29.0%	33.3%	33.5%	33.3%	25.0%	29.8%	21.7%	30.0%
\$30,001–\$45,000	Loan Originated	317	377	361	240	152	140	113	118	1,818
	Application Denied	84	116	122	70	44	38	32	31	537
	Denial Rate	20.9%	23.5%	25.3%	22.6%	22.4%	21.3%	22.1%	20.8%	22.8%
\$45,001–\$60,000	Loan Originated	221	291	232	160	122	71	74	97	1,268
	Application Denied	53	79	70	48	34	21	19	23	347
	Denial Rate	19.3%	21.4%	23.2%	23.1%	21.8%	22.8%	20.4%	19.2%	21.5%
\$60,001–\$75,000	Loan Originated	121	154	128	102	63	33	42	57	700
	Application Denied	28	36	36	25	15	12	6	10	168
	Denial Rate	18.8%	18.9%	22.0%	19.7%	19.2%	26.7%	12.5%	14.9%	19.4%
Above \$75,000	Loan Originated	126	183	168	133	75	52	54	87	878
	Application Denied	15	32	37	24	17	18	14	18	175
	Denial Rate	10.6%	14.9%	18.0%	15.3%	18.5%	25.7%	20.6%	17.1%	16.6%
Data Missing	Loan Originated	31	23	24	8	2	2	3	3	96
	Application Denied	14	11	13	4	0	3	4	3	52
	Denial Rate	31.1%	32.4%	35.1%	33.3%	.0%	60.0%	57.1%	50.0%	35.1%
Total	Loan Originated	1,046	1,279	1,136	797	530	389	371	459	6,007
	Application Denied	307	390	394	252	172	130	114	115	1,874
	Denial Rate	22.7%	23.4%	25.8%	24.0%	24.5%	25.0%	23.5%	20.0%	23.8%

Table 11.D.14
Loan Applications by Income and Race/Ethnicity of Applicant: Originated and Denied
 11. Ashtabula County
 2004–2011 HMDA Data

Race		<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	> \$75K	Data Missing	Total
American Indian	Loan Originated	0	4	3	1	2	5	0	15
	Application Denied	1	5	2	1	2	1	1	13
	Denial Rate	100.0%	55.6%	40.0%	50.0%	50.0%	16.7%	100.0%	46.4%
Asian	Loan Originated	1	3	8	11	2	4	0	29
	Application Denied	0	3	4	3	2	4	0	16
	Denial Rate	.0%	50.0%	33.3%	21.4%	50.0%	50.0%	%	35.6%
Black	Loan Originated	1	16	24	19	11	12	3	86
	Application Denied	5	14	9	13	3	5	2	51
	Denial Rate	83.3%	46.7%	27.3%	40.6%	21.4%	29.4%	40.0%	37.2%
White	Loan Originated	56	1,073	1,652	1,133	630	774	88	5,406
	Application Denied	76	424	457	273	141	139	31	1,541
	Denial Rate	57.6%	28.3%	21.7%	19.4%	18.3%	15.2%	26.1%	22.2%
Not Available	Loan Originated	10	83	131	104	55	83	4	470
	Application Denied	7	60	65	57	20	26	17	252
	Denial Rate	41.2%	42.0%	33.2%	35.4%	26.7%	23.9%	81.0%	34.9%
Not Applicable	Loan Originated	0	0	0	0	0	0	1	1
	Application Denied	0	0	0	0	0	0	1	1
	Denial Rate	%	%	%	%	%	%	50.0%	50.0%
Total	Loan Originated	68	1,179	1,818	1,268	700	878	96	6,007
	Application Denied	89	506	537	347	168	175	52	1,874
	Denial Rate	56.7%	30.0%	22.8%	21.5%	19.4%	16.6%	35.1%	23.8%
Non-Hispanic Ethnicity	Loan Originated	55	1,042	1,611	1,121	623	778	90	5,320
	Application Denied	75	417	449	277	146	140	30	1,534
	Denial Rate	57.7%	28.6%	21.8%	19.8%	19.0%	15.3%	25.0%	22.4%
Hispanic (Ethnicity)	Loan Originated	3	32	26	28	15	2	1	107
	Application Denied	4	20	5	8	2	5	2	46
	Denial Rate	57.1%	38.5%	16.1%	22.2%	11.8%	71.4%	66.7%	30.1%

PREDATORY LENDING

Table 11.D.15
Originated Owner-Occupied Loans by HAL Status
 11. Ashtabula County
 2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Other	825	824	756	612	446	352	362	453	4,630
HAL	221	455	380	185	84	37	9	6	1,377
Total	1,046	1,279	1,136	797	530	389	371	459	6,007
Percent HAL	21.1%	35.6%	33.5%	23.2%	15.8%	9.5%	2.4%	1.3%	22.9%

Table 11.D.16
Loans by Loan Purpose by HAL Status
 11. Ashtabula County
 2004–2011 HMDA Data

Loan Purpose		2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	Other	825	824	756	612	446	352	362	453	4,630
	HAL	221	455	380	185	84	37	9	6	1,377
	Percent HAL	21.1%	35.6%	33.5%	23.2%	15.8%	9.5%	2.4%	1.3%	22.9%
Home Improvement	Other	239	237	342	200	92	49	59	87	1,305
	HAL	79	115	98	91	48	18	13	7	469
	Percent HAL	24.8%	32.7%	22.3%	31.3%	34.3%	26.9%	18.1%	7.4%	26.4%
Refinancing	Other	1,389	1,078	909	708	508	679	693	698	6,662
	HAL	527	613	587	246	174	71	11	20	2,249
	Percent HAL	27.5%	36.3%	39.2%	25.8%	25.5%	9.5%	1.6%	2.8%	25.2%
Total	Other	2,453	2,139	2,007	1,520	1,046	1,080	1,114	1,238	12,597
	HAL	827	1,183	1,065	522	84	37	9	6	4,095
	Percent HAL	25.2%	35.6%	34.7%	25.6%	22.6%	10.4%	2.9%	2.6%	24.5%

Table 11.D.17
HALs Originated by Race of Borrower
 11. Ashtabula County
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	0	1	0	0	0	0	0	0	1
Asian	1	6	1	3	0	0	0	0	11
Black	5	8	12	1	0	0	0	0	26
White	189	376	336	169	71	35	9	6	1,191
Not Available	26	64	31	12	13	2	0	0	148
Not Applicable	0	0	0	0	0	0	0	0	0
Total	221	455	380	185	84	37	9	6	1,377
Hispanic (Ethnicity)	9	8	8	3	1	1	0	0	30

Table 11.D.18
Rate of HALs Originated by Race/Ethnicity of Borrower
 11. Ashtabula County
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	.0%	33.3%	%	.0%	.0%	.0%	.0%	.0%	6.7%
Asian	14.3%	60.0%	50.0%	60.0%	.0%	%	.0%	%	37.9%
Black	35.7%	44.4%	60.0%	6.3%	.0%	%	.0%	.0%	30.2%
White	20.0%	34.3%	32.7%	23.4%	14.7%	9.4%	2.7%	1.4%	22.0%
Not Available	32.9%	42.4%	36.0%	22.6%	36.1%	12.5%	.0%	.0%	31.5%
Not Applicable	.0%	%	%	%	%	%	%	%	0%
Average	21.1%	35.6%	33.5%	23.2%	15.8%	9.5%	02.4%	01.3%	22.9%
Non-Hispanic Ethnicity	20.4%	34.2%	32.9%	23.2%	15.1%	9.5%	2.7%	1.2%	22.2%
Hispanic (Ethnicity)	37.5%	44.4%	42.1%	30.0%	7.1%	8.3%	.0%	.0%	28.0%

Table 11.D.19
Loans by HAL Status by Race/Ethnicity of Borrower
 11. Ashtabula County
 2004–2011 HMDA Data

Race	Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Other	1	2	0	1	2	1	4	3	14
	HAL	0	1	0	0	0	0	0	0	1
	Percent HAL	.0%	33.3%	%	.0%	.0%	.0%	.0%	.0%	6.7%
Asian	Other	6	4	1	2	4	0	1	0	18
	HAL	1	6	1	3	0	0	0	0	11
	Percent HAL	14.3%	60.0%	50.0%	60.0%	.0%	%	.0%	%	37.9%
Black	Other	9	10	8	15	5	0	8	5	60
	HAL	5	8	12	1	0	0	0	0	26
	Percent HAL	35.7%	44.4%	60.0%	6.3%	.0%	%	.0%	.0%	30.2%
White	Other	755	721	692	553	412	337	321	424	4,215
	HAL	189	376	336	169	71	35	9	6	1,191
	Percent HAL	20.0%	34.3%	32.7%	23.4%	14.7%	9.4%	02.7%	01.4%	22.0%
Not Available	Other	53	87	55	41	23	14	28	21	322
	HAL	26	64	31	12	13	2	0	0	148
	Percent HAL	32.9%	42.4%	36.0%	22.6%	36.1%	12.5%	.0%	.0%	31.5%
Not Applicable	Other	1	0	0	0	0	0	0	0	1
	HAL	0	0	0	0	0	0	0	0	0
	Percent HAL	.0%	%	%	%	%	%	%	%	0.0%
Total	Other	825	824	756	612	446	352	362	453	4,630
	HAL	221	455	380	185	84	37	9	6	1,377
	Percent HAL	21.1%	35.6%	33.5%	23.2%	15.8%	9.5%	2.4%	1.3%	22.9%
Non-Hispanic Ethnicity	Other	672	721	693	566	410	323	329	427	4,141
	HAL	172	375	340	171	73	34	9	5	1,179
	Percent HAL	20.4%	34.2%	32.9%	23.2%	15.1%	9.5%	2.7%	1.2%	22.2%
Hispanic (Ethnicity)	Other	15	10	11	7	13	11	6	4	77
	HAL	9	8	8	3	1	1	0	0	30
	Percent HAL	37.5%	44.4%	42.1%	30.0%	7.1%	8.3%	.0%	.0%	28.0%

Table 11.D.20
Rates of HALs by Income of Borrower
 11. Ashtabula County
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Average
\$15,000 or Below	66.7%	15.4%	41.2%	44.4%	25.0%	.0%	16.7%	.0%	29.4%
\$15,001–\$30,000	29.0%	44.5%	38.3%	29.0%	20.5%	13.8%	4.1%	3.2%	28.2%
\$30,001–\$45,000	23.0%	34.7%	38.0%	29.6%	18.4%	11.4%	2.7%	.8%	25.3%
\$45,001–\$60,000	19.5%	39.2%	30.6%	19.4%	11.5%	8.5%	.0%	.0%	22.0%
\$60,001–\$75,000	18.2%	31.2%	29.7%	13.7%	15.9%	3.0%	.0%	1.8%	19.1%
Above \$75,000	10.3%	25.1%	21.4%	15.0%	10.7%	3.8%	0.0%	1.1%	14.4%
Data Missing	3.2%	34.8%	50.0%	37.5%	.0%	.0%	33.3%	.0%	26.0%
Average	21.1%	35.6%	33.5%	23.2%	15.8%	9.5%	2.4%	1.3%	22.9%

Table 11.D.21
Loans by HAL Status by Income of Borrower
 11. Ashtabula County
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Other	2	11	10	5	3	4	10	3	48
	HAL	4	2	7	4	1	0	2	0	20
	Percent HAL	66.7%	15.4%	41.2%	44.4%	25.0%	.0%	16.7%	.0%	29.4%
\$15,001–\$30,000	Other	159	132	127	103	89	75	70	91	846
	HAL	65	106	79	42	23	12	3	3	333
	Percent HAL	29.0%	44.5%	38.3%	29.0%	20.5%	13.8%	4.1%	3.2%	28.2%
\$30,001–\$45,000	Other	244	246	224	169	124	124	110	117	1,358
	HAL	73	131	137	71	28	16	3	1	460
	Percent HAL	23.0%	34.7%	38.0%	29.6%	18.4%	11.4%	2.7%	.8%	25.3%
\$45,001–\$60,000	Other	178	177	161	129	108	65	74	97	989
	HAL	43	114	71	31	14	6	0	0	279
	Percent HAL	19.5%	39.2%	30.6%	19.4%	11.5%	8.5%	.0%	.0%	22.0%
\$60,001–\$75,000	Other	99	106	90	88	53	32	42	56	566
	HAL	22	48	38	14	10	1	0	1	134
	Percent HAL	18.2%	31.2%	29.7%	13.7%	15.9%	3.0%	.0%	1.8%	19.1%
Above \$75,000	Other	113	137	132	113	67	50	54	86	752
	HAL	13	46	36	20	8	2	0	1	126
	Percent HAL	10.3%	25.1%	21.4%	15.0%	10.7%	3.8%	.0%	1.1%	14.4%
Data Missing	Other	30	15	12	5	2	2	2	3	71
	HAL	1	8	12	3	0	0	1	0	25
	Percent HAL	3.2%	34.8%	50.0%	37.5%	.0%	.0%	33.3%	.0%	26.0%
Total	Other	825	824	756	612	446	352	362	453	4,630
	HAL	221	455	380	185	84	37	9	6	1,377
	Percent HAL	21.1%	35.6%	33.5%	23.2%	15.8%	9.5%	2.4%	1.3%	22.9%

E. CRA DATA

Additional data tables related to Community Reinvestment Act (CRA) data are presented in this section.

Table 11.E.1
Small Business Loans Originated: \$100,000 or Less by Tract MFI
 11. Ashtabula County
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	33	439	513			985
2001	50	620	787			1,457
2002	58	770	973			1,801
2003	48	426	1,355			1,829
2004		239	1,555			1,794
2005		223	1,663			1,886
2006		268	1,890			2,158
2007		285	2,158			2,443
2008		184	1,621			1,805
2009		99	613			712
2010		75	527			602
2011		102	699			801
Total	189	3,730	14,354	0	0	18,273
Loan Amount (\$1,000s)						
2000	456	6,460	7,392			14,308
2001	666	6,101	8,760			15,527
2002	628	7,314	8,655			16,597
2003	743	4,406	13,038			18,187
2004		1,906	13,708			15,614
2005		2,302	16,230			18,532
2006		2,334	18,035			20,369
2007		2,824	19,407			22,231
2008		1,671	13,433			15,104
2009		1,332	7,479			8,811
2010		1,266	6,868			8,134
2011		1,606	8,543			10,149
Total	2,493	39,522	141,548	0	0	183,563

Table 11.E.2
Small Business Loans Originated: \$100,001 to \$250,000 by Tract MFI
 11. Ashtabula County
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	3	25	21			49
2001	2	33	25			60
2002	3	36	34			73
2003	2	10	40			52
2004		11	37			48
2005		19	45			64
2006		15	42			57
2007		5	37			42
2008		4	22			26
2009		6	13			19
2010		6	34			40
2011		2	26			28
Total	10	172	376	0	0	558
Loan Amount (\$1,000s)						
2000	420	4,137	3,508			8,065
2001	330	5,386	4,613			10,329
2002	543	5,893	5,791			12,227
2003	311	1,735	6,646			8,692
2004		2,295	6,392			8,687
2005		3,275	7,449			10,724
2006		2,600	6,973			9,573
2007		860	6,067			6,927
2008		646	3,957			4,603
2009		1,035	2,351			3,386
2010		1,169	6,319			7,488
2011		295	4,143			4,438
Total	1,604	29,326	64,209	0	0	95,139

Table 11.E.3
Small Business Loans Originated: More than \$250,000 by Tract MFI
 11. Ashtabula County
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	0	8	13			21
2001	3	11	18			32
2002	4	17	28			49
2003	0	11	28			39
2004		6	33			39
2005		11	46			57
2006		7	35			42
2007		4	21			25
2008		6	22			28
2009		5	12			17
2010		3	22			25
2011		6	24			30
Total	7	95	302	0	0	404
Loan Amount (\$1,000s)						
2000	0	4,188	7,161			11,349
2001	1,111	5,929	9,818			16,858
2002	1,934	9,902	14,261			26,097
2003	0	6,356	15,093			21,449
2004		2,504	17,103			19,607
2005		6,518	24,927			31,445
2006		4,430	21,599			26,029
2007		2,800	12,619			15,419
2008		3,520	12,143			15,663
2009		3,127	6,156			9,283
2010		1,839	11,363			13,202
2011		3,470	13,915			17,385
Total	3,045	54,583	166,158	0	0	223,786

Table 11.E.4
Small Business Loans to Businesses with Gross Annual Revenues of Less Than \$1 Million by Tract MFI
 11. Ashtabula County
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	20	219	277			516
2001	16	253	292			561
2002	14	205	223			442
2003	14	151	414			579
2004		85	523			608
2005		133	840			973
2006		98	817			915
2007		140	925			1,065
2008		63	586			649
2009		54	256			310
2010		35	203			238
2011		54	333			387
Total	64	1,490	5,689	0	0	7,243
Loan Amount (\$1,000s)						
2000	490	8,014	10,391			18,895
2001	749	7,857	10,372			18,978
2002	1,613	12,514	11,327			25,454
2003	433	3,632	13,387			17,452
2004		3,922	13,449			17,371
2005		5,181	19,932			25,113
2006		3,658	17,263			20,921
2007		2,406	14,556			16,962
2008		1,310	10,729			12,039
2009		2,778	5,497			8,275
2010		2,512	7,275			9,787
2011		2,582	7,662			10,244
Total	3,285	56,366	141,840	0	0	201,491

F. COMPLAINT DATA

This section contains data regarding fair housing complaints, as provided by the U.S. Department of Housing and Urban Development (HUD), the Ohio Civil Rights Commission (OCRC), and the Fair Housing Resource Center (FHRC).

HUD COMPLAINTS

Table 11.F.1
Fair Housing Complaints by Basis
11. Ashtabula County
2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability		2	1	4	11	3	4	5	2	32
Family Status				2	2		2			6
National Origin						1				1
Race	1	1	3	1	1	2		2		11
Sex						1				1
Total Bases	1	3	4	7	14	7	6	7	2	51
Total Complaints	1	2	3	6	14	5	4	7	2	44

Table 11.F.2
Fair Housing Complaints by Issue
11. Ashtabula County
2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Discriminatory terms, conditions, privileges, or services and facilities		1	1		2			3	1	8
Discriminatory refusal to rent					6					6
Discriminatory refusal to rent and negotiate for rental				1	1			1		3
Discrimination in services and facilities relating to rental					1			2		3
Otherwise deny or make housing available								3		3
Discriminatory acts under Section 818 (coercion, etc.)		1		1						2
Failure to make reasonable accommodation		2		3	4	2		4		15
Discrimination in terms, conditions or privileges relating to rental	1	1	2		2	1	3	1		11
Discriminatory advertising, statements, and notices				2	6	1	1			10
False denial or representation of availability - rental							1			1
Using ordinances to discriminate in zoning and land use						1				1
Non-compliance with design and construction requirements (handicap)									1	1
Failure to provide an accessible building entrance		1								1
Total Issues	1	6	3	7	22	5	5	14	2	65
Total Complaints	1	2	3	6	14	5	4	7	2	44

Table 11.F.3
Fair Housing Complaints by Closure Status
 11. Ashtabula County
 2004–2012 HUD Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Administrative Closure Cause (FHAP)			1			2		1		4
Conciliated / Settled		1	1	4	3	2	2	4	1	18
No Cause	1	1	1		1	1				5
Open									1	1
Total Complaints	1	2	3	6	14	5	4	7	2	44

HUD Complaints Found With Cause

Table 11.F.4
Fair Housing Complaints Found With Cause by Basis
 11. Ashtabula County
 2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability		1	1	4	11	2	4	5	1	29
Family Status				2	2		2			6
Race		1	1	1				1		4
Sex						1				1
Total Bases	2	2	2	7	13	3	6	6	1	40
Total Complaints	1	1	1	6	13	2	4	6	1	34

Table 11.F.5
Fair Housing Complaints Found With Cause by Issue
 11. Ashtabula County
 2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Discriminatory refusal to rent					6					6
Discriminatory terms, conditions, privileges, or services and facilities			1		2			3		6
Discrimination in terms, conditions or privileges relating to rental				1	1		3	1		6
Discrimination in services and facilities relating to rental					1			2		3
Discriminatory refusal to rent and negotiate for rental				1	1					2
Otherwise deny or make housing available								2		2
Discriminatory acts under Section 818 (coercion, etc.)		1		1						2
Failure to make reasonable accommodation		1		3	4	1		4		13
Discriminatory advertising, statements, and notices				2	6	1	1			10
False denial or representation of availability - rental							1			1
Non-compliance with design and construction requirements (handicap)									1	1
Failure to provide an accessible building entrance		1								1
Total Issues	0	4	1	7	21	2	5	12	1	53
Total Complaints		1	1	6	13	2	4	6	1	34

OHIO CIVIL RIGHTS COMMISSION COMPLAINTS

Table 11.F.6
Fair Housing Complaints by Basis
 11. Ashtabula County
 2004–2012 OCRC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability		1		3	10	4	2	3		23
Family Status				4				1		5
Race	2	1	3	1	5			3		17
Retaliation		2		1						3
Total Bases	2	4	3	9	12	10	2	7	0	49
Total Complaints	1	2	2	7	10	7	2	5		36

Table 11.F.7
Fair Housing Complaints by Issue
 11. Ashtabula County
 2004–2012 OCRC Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Exclusion					5					5
Harassment	1			1						2
Intimidation						1				1
Other		1	1	5	1	5		1		14
Reasonable Accommodation				2	7	2	2	3		16
Terms and Conditions		1	1		2			3		7
Total Issues	1	2	2	8	15	8	2	7	0	45
Total Complaints	1	2	2	7	10	7	2	5		36

Table 11.F.8
Fair Housing Complaints by Closure Status
 11. Ashtabula County
 2004–2012 OCRC Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
CP Failed to Cooperate			1			1		1		3
CP Withdrawal – No Benefit				1						1
No Cause Finding Issued	1	2	1	1	1	1				7
No Jurisdiction						1				1
Settlement With Benefits				1	5	2	1	3		12
Successful Conciliation					4	1	1			6
Withdrawal With Benefits				4		1		1		6
Total Complaints	1	2	2	7	10	7	2	5	0	36

FAIR HOUSING RESOURCE CENTER COMPLAINTS

Table 11.F.11
Fair Housing Complaints by Basis
 11. Ashtabula County
 2004–2012 FHRC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability					2	2	1	1		6
Family Status									1	1
Race			1			1				2
Other	1			2			1	1		5
Total Bases	1	0	1	2	2	3	2	2	1	14
Total Complaints	1		1	2	2	3	2	2	1	14

Table 11.F.12
Fair Housing Complaints by Issue Type
 11. Ashtabula County
 2004– 2012 FHRC Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Rental	1		1	2	2	3	2	2	1	14
Total	1	0	1	2	2	3	2	2	1	14

Table 11.F.13
Fair Housing Complaints by Closure Status
 11. Ashtabula County
 2004– 2012 FHRC Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Settled through counseling	1		1	2	2	3		2	1	12
Complaint filed in federal court										5
Reasonable Accommodation Granted							2			2
Total	1	0	1	2	2	3	2	2	1	14

G. FAIR HOUSING SURVEY FOR HOUSING STAKEHOLDERS DATA

This section presents public involvement data gathered through the 2012–2013 Fair Housing Survey for Housing Stakeholders.

Table 11.G.1
Primary Role of Respondent
 11. Ashtabula County
 2012–2013 Fair Housing Survey for Housing
 Stakeholders Data

Primary Role	Total
Advocate/Service Provider	1
Real Estate	2
Other Role	4
Total	7

FEDERAL, STATE, AND LOCAL LAWS

Table 11.G.2
**Familiarity with Fair
 Housing Laws**

11. Ashtabula County
 2012–2013 Fair Housing Survey
 for Housing Stakeholders Data

Familiarity	Total
Not Familiar	1
Somewhat Familiar	0
Very Familiar	5
Missing	1
Total	7

Table 11.G.3
Perceptions About Fair Housing Laws

11. Ashtabula County
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?	6			1	7
Are fair housing laws difficult to understand or follow?	1	4	1	1	7
Do you think fair housing laws should be changed?	1	4		2	7
Do you think fair housing laws are adequately enforced?	4		1	2	7

Table 11.G.4
Fair Housing Activities

11. Ashtabula County
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?		4		1	2	7
Have you participated in fair housing training?		5			2	7
Are you aware of any fair housing testing?		4	1		2	7
Testing and education	Too Little	Right Amount	Too Much	Don't Know	Missing	Total
Is there sufficient outreach and education activity?	2	1	1	1	2	7
Is there sufficient testing?		1	1	3	2	7

Table 11.G.5
Protected Classes

11. Ashtabula County
2012–2013 Fair Housing Survey
for Housing Stakeholders Data

Protected Class	Total
Family Status	4
Religion	4
Gender	3
National Origin	2
Color	2
Sexual Orientation	1
Age	1
Military	2
Ancestry	1
Other	1
Total	21

Table 11.G.6
Fair Housing Violation Referrals

11. Ashtabula County
2012–2013 Fair Housing Survey for Housing
Stakeholders Data

Referral	Total
Ashtabula County Fair Housing Office	1
Don't Know	1
HUD	2
Total	4

LOCAL FAIR HOUSING

Table 11.G.7

Local Fair Housing

11. Ashtabula County

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?	1	2		4	7
Are there any specific geographic areas that have fair housing problems?		1	2	4	7
Are there any specific groups in that face housing discrimination?		1	2	4	7

FAIR HOUSING IN THE PRIVATE SECTOR

Table 11.G.8

Barriers to Fair Housing in the Private Sector

11. Ashtabula County

2012–2013 Fair Housing Survey for Housing Stakeholders Data

Question	Yes	No	Don't Know	Missing	Total
Are you aware of any questionable practices or barriers to fair housing choice in:					
The rental housing market?	4	1	2	7	
The real estate industry?	5		2	7	
The mortgage and home lending industry?	5		2	7	
The housing construction or accessible housing design fields?	4	1	2	7	
The home insurance industry?	4	1	2	7	
The home appraisal industry?	5		2	7	
Any other housing services?	4		3	7	

FAIR HOUSING IN THE PUBLIC SECTOR

Table 11.G.9

Barriers to Fair Housing in the Public Sector

11. Ashtabula County

2012–2013 Fair Housing Survey for Housing Stakeholders Data

Question	Yes	No	Don't Know	Missing	Total
Are you aware of any questionable practices or barriers to fair housing choice in:					
Land use policies?		2	1	4	7
Zoning laws?		2	1	4	7
Occupancy standards or health and safety codes?		2	1	4	7
Property tax policies?	1	1	1	4	7
Permitting process?		2	1	4	7
Housing construction standards?		2	1	4	7
Neighborhood or community development policies?		2	1	4	7
Limited access to government services, such as employment services?		3		4	7
Public administrative actions or regulations?		3		4	7

NARRATIVE COMMENTS

Federal, State, and Local Laws

Table 11.G.10
How did you become aware of fair housing laws?

11. Ashtabula County
2013 Fair Housing Survey Data

Comments:
education I am a Real Estate broker Through trainings for Housing Counselors under HUD. Was a Realtor for over 15 years

Table 11.G.11
How should fair housing laws be changed?

11. Ashtabula County
2013 Fair Housing Survey Data

Comments:
Familial status because sometimes a landlord should have the option to rent certain units to certain size families.

H. LAND USE PLANNING SURVEY DATA

This section contains data regarding the potential effects of local land use and housing policies on fair housing choice, as gathered from the Fair Housing Survey for Government Officials.

FAIR HOUSING SURVEY FOR GOVERNMENT OFFICIALS

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 was conducted predominately online. Respondents were solicited by mass-distributed emails sent by the NEOSCC, members of the Progress Review Team, and other various organizations in the 12-county region.

This section contains data gathered from the public sector staff in the Ashtabula County that received and completed the survey.⁵³

⁵³ For areas with both nonentitlement and entitlement communities, the results of the nonentitlement community government official survey and the entitlement community interviews were summed.

Table 11.H.1
Housing Development
 11. Ashtabula County
 2012 Fair Housing Survey for Government Officials Data

Question: Does your jurisdiction have...	Yes	No	Don't Know	Missing	Total
Housing Development					
Definitions for "dwelling unit" or "residential unit"?				3	3
Guidelines that encourage development affordable housing units?				3	3
Any potential barriers to the development of low- to moderate- income housing?				3	3
Guidelines that allow the development of mixed use housing?				3	3
Any potential barriers to the development of mixed use housing?				3	3
Occupancy Standards					
A definition for the term "family"?				3	3
Residential occupancy standards or limits?				3	3
Special Needs Housing					
A definition for the term "disability"?				3	3
Development standards for making housing accessible to persons with disabilities?				3	3
A process by which persons with disabilities can request modification to the jurisdiction's policies?				3	3
Standards for the development of senior housing?				3	3
Guidelines that distinguish senior citizen housing from other residential uses?				3	3
Guidelines for developing housing for any other special needs populations?				3	3
Fair Housing Policies					
A fair housing ordinance, policy, or regulation?				3	3
Policies or practices for "affirmatively furthering fair housing"?				3	3

I. IMPEDIMENTS

The 2013 Northeast Ohio Regional Analysis of Impediments to Fair Housing Choice uncovered several potential issues regarding fair housing in the Ashtabula County. Identification of these items as probable impediments to fair housing choice was based on HUD's definition of impediments as actions, omissions, or decisions that restrict housing choice due to protected class status or actions, omissions, or decisions that have this effect. The identified impediments are supported by evidence uncovered during the Regional AI process, with impediments of higher need being those identified in multiple sources.

These probable impediments in the entirety of the Northeast Ohio Region are presented in **Volumes I** and **II** of the Regional AI. They are accompanied by suggested actions that jurisdictions in the Region may implement in order to alleviate or eliminate these impediments, and are accompanied by measurable objectives. The goal of these actions and measurable objectives is to assist these agencies in offering greater housing choice for all citizens of the Northeast Ohio Region.

The following list presents the private and public sector impediments found in the Ashtabula County.

PRIVATE SECTOR

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

The review of fair housing cases and results of the Fair Housing Survey both supported denial of available housing units in the rental market as an

impediment to fair housing choice in the Region. Denial of housing in the rental markets was found to be most frequently based on race, disability, and familial status.

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

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

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

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

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

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

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

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

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

Suggestion: Additional training for landlords and property managers.

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

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

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

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

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

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

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

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

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

8. *Impediment: Denial of home purchase loans*

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

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

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

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

Suggestion: Utilize resources for first-time and lower-income homebuyers that belong to race, ethnic, and gender protected classes so that they can improve their credit 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:* 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.

IMPEDIMENTS MATRIX

The matrix on the following page includes the impediment, data source, or sources that indicated its existence, protected classes most affected, and ranking of need for action. Level of need for action was determined based on the number of data sources that identified each impediment.

Table 11.I.1
Impediments Matrix
 11. Ashtabula County
 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 ⁵⁴		
Private Sector												
1	Denial of available housing units in the rental markets		X				X	X			Black and Hispanic persons	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			Black and Hispanic persons	M
10	Failure to comply with accessibility requirements in construction of housing units							X			Disabled persons	L
Public Sector												
1	Lack of sufficient fair housing policies or practices by several units of local government							X			All	L
2	Lack of sufficient fair housing outreach and education efforts							X		X	All	M
3	Land use and planning decisions and operational practices resulting in unequal access to government services such as transportation							X		X	All	M
4	Lack of inclusionary policies							X		X	All	M

⁵⁴ 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.

12. CUYAHOGA COUNTY

A. CENSUS BUREAU DATA

This section contains additional data from the U.S. Census Bureau.

Table 12.A.1

Population by Age

12. Cuyahoga County

2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Under 5	90,996	6.5%	74,793	5.8%	-17.8%
5 to 19	290,567	20.8%	250,297	19.6%	-13.9%
20 to 24	77,515	5.6%	78,335	6.1%	1.1%
25 to 34	188,873	13.5%	157,986	12.3%	-16.4%
35 to 54	407,050	29.2%	356,059	27.8%	-12.5%
55 to 64	121,816	8.7%	164,111	12.8%	34.7%
65 or Older	217,161	15.6%	198,541	15.5%	-8.6%
Total	1,393,978	100.0%	1,280,122	100.0%	-8.2%

Table 12.A.2

Elderly Population by Age

12. Cuyahoga County

2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
65 to 66	21,085	9.7%	21,722	10.9%	3.0%
67 to 69	31,648	14.6%	31,211	15.7%	-1.4%
70 to 74	54,594	25.1%	42,673	21.5%	-21.8%
75 to 79	48,908	22.5%	36,842	18.6%	-24.7%
80 to 84	33,561	15.5%	32,672	16.5%	-2.6%
85 or Older	27,365	12.6%	33,421	16.8%	22.1%
Total	217,161	100.0%	198,541	100.0%	-8.6%

Table 12.A.3

Population by Race and Ethnicity

12. Cuyahoga County

2000 & 2010 Census SF1 Data

Race	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
White	938,863	67.4%	814,103	63.6%	-13.3%
Black	382,634	27.4%	380,198	29.7%	-.6%
American Indian	2,529	.2%	2,578	.2%	1.9%
Asian	25,245	1.8%	32,883	2.6%	30.3%
Native Hawaiian/ Pacific Islander	338	.0%	285	.0%	-15.7%
Other	20,962	1.5%	23,339	1.8%	11.3%
Two or More Races	23,407	1.7%	26,736	2.1%	14.2%
Total	1,393,978	100.0%	1,280,122	100.0%	-8.2%
Non-Hispanic	1,346,900	96.6%	1,218,852	95.2%	-9.5%
Hispanic	47,078	3.4%	61,270	4.8%	30.1%

Table 12.A.4
Disability by Age
 12. Cuyahoga County
 2010 Three-Year ACS Data

Age	Male		Female		Total	
	Disabled Population	Disability Rate	Disabled Population	Disability Rate	Disabled Population	Disability Rate
Under 5	320	.8%	283	.8%	603	.8%
5 to 17	9,401	8.5%	5,767	5.4%	15,168	6.9%
18 to 34	9,991	7.7%	9,690	7.0%	19,681	7.3%
35 to 64	35,123	14.2%	39,636	14.6%	74,759	14.4%
65 to 74	10,089	24.8%	14,259	27.1%	24,348	26.1%
75 or Older	17,043	47.2%	31,033	51.8%	48,076	50.1%
Total	81,967	13.6%	100,668	15.1%	182,635	14.4%

Table 12.A.5
Employment Status by Disability and Type: Age 18 to 64
 12. Cuyahoga County
 2010 Three-Year ACS Data

Disability Status	Population
Employed:	548,983
With a disability:	33,354
With a hearing difficulty	8,000
With a vision difficulty	5,565
With a cognitive difficulty	11,726
With an ambulatory difficulty	13,424
With a self-care difficulty	4,555
With an independent living difficulty	8,732
No disability	515,629
Unemployed:	70,586
With a disability:	10,592
With a hearing difficulty	1,569
With a vision difficulty	1,667
With a cognitive difficulty	5,346
With an ambulatory difficulty	4,072
With a self-care difficulty	1,074
With an independent living difficulty	2,693
No disability	59,994
Not in labor force:	166,072
With a disability:	50,494
With a hearing difficulty	6,597
With a vision difficulty	7,880
With a cognitive difficulty	25,273
With an ambulatory difficulty	31,225
With a self-care difficulty	12,429
With an independent living difficulty	25,343
No disability	115,578
Total	785,641

Table 12.A.6**Households by Income**

12. Cuyahoga County

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	103,647	18.1%	92,802	17.2%
\$15,000 to \$19,999	38,347	6.7%	34,642	6.4%
\$20,000 to \$24,999	39,784	7.0%	32,612	6.1%
\$25,000 to \$34,999	75,373	13.2%	61,422	11.4%
\$35,000 to \$49,999	93,064	16.3%	79,686	14.8%
\$50,000 to \$74,999	105,138	18.4%	92,500	17.2%
\$75,000 to \$99,999	54,848	9.6%	57,534	10.7%
\$100,000 or More	61,405	10.7%	87,746	16.3%
Total	571,606	100.0%	538,944	100.0%

Table 12.A.7**Poverty by Age**

12. Cuyahoga County

2000 Census SF3 & 2010 Five-Year ACS Data

Age	2000 Census		2010 Five-Year ACS	
	Persons in Poverty	% of Total	Persons in Poverty	% of Total
Under 6	23,900	13.3%	25,427	12.2%
6 to 17	43,414	24.2%	47,819	23.0%
18 to 64	92,976	51.8%	113,833	54.8%
65 or Older	19,082	10.6%	20,547	9.9%
Total	179,372	100.0%	207,626	100.0%
Poverty Rate	13.1%	.	16.4%	.

Table 12.A.8**Households by Year Home Built**

12. Cuyahoga County

2000 Census SF3 & 2010 Five-Year ACS Data

Year Built	2000 Census		2010 Five-Year ACS	
	Households	% of Total	Households	% of Total
1939 or Earlier	160,476	28.1%	154,816	28.7%
1940 to 1949	76,589	13.4%	55,549	10.3%
1950 to 1959	121,570	21.3%	116,556	21.6%
1960 to 1969	88,011	15.4%	74,607	13.8%
1970 to 1979	59,887	10.5%	55,640	10.3%
1980 to 1989	32,151	5.6%	30,592	5.7%
1990 to 1999	32,773	5.7%	30,237	5.6%
2000 to 2004	.	.	14,092	2.6%
2005 or Later	.	.	6,855	1.3%
Total	571,457	100.0%	538,944	100.0%

Table 12.A.9**Housing Units by Type**

12. Cuyahoga County

2000 Census SF3 & 2010 Five-Year ACS Data

Unit Type	2000 Census		2010 Five-Year ACS	
	Units	% of Total	Units	% of Total
Single-Family	392,564	63.6%	399,603	64.2%
Duplex	59,729	9.7%	61,484	9.9%
Tri- or Four-Plex	25,309	4.1%	23,094	3.7%
Apartment	136,032	22.1%	134,769	21.6%
Mobile Home	3,214	.5%	3,512	.6%
Boat, RV, Van, Etc.	55	.0%	175	.0%
Total	616,903	100.0%	622,637	100.0%

Table 12.A.10**Housing Units by Tenure**

12. Cuyahoga County

2000 & 2010 Census SF1 Data

Tenure	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
Occupied Housing Units	571,457	92.6%	545,056	87.7%	-4.6%
Owner-Occupied	360,980	63.2%	331,876	60.9%	-8.1%
Renter-Occupied	210,477	36.8%	213,180	39.1%	1.3%
Vacant Housing Units	45,446	7.4%	76,707	12.3%	68.8%
Total Housing Units	616,903	100.0%	621,763	100.0%	.8%

Table 12.A.11**Disposition of Vacant Housing Units**

12. Cuyahoga County

2000 & 2010 Census SF1 Data

Disposition	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
For Rent	21,794	48.0%	32,522	42.4%	49.2%
For Sale	5,218	11.5%	9,679	12.6%	85.5%
Rented or Sold, Not Occupied	4,109	9.0%	3,725	4.9%	-9.3%
For Seasonal, Recreational, or Occasional Use	2,338	5.1%	2,463	3.2%	5.3%
For Migrant Workers	12	0.0%	8	.0%	-33.3%
Other Vacant	11,975	26.3%	28,310	36.9%	136.4%
Total	45,446	100.0%	76,707	100.0%	68.8%

Table 12.A.12**Households by Household Size**

12. Cuyahoga County

2000 & 2010 Census SF1 Data

Size	2000 Census		2010 Census		% Change 00-10
	Households	% of Total	Households	% of Total	
One Person	187,395	32.8%	193,371	35.5%	3.2%
Two Persons	177,590	31.1%	169,700	31.1%	-4.4%
Three Persons	86,916	15.2%	79,813	14.6%	-8.2%
Four Persons	68,362	12.0%	59,072	10.8%	-13.6%
Five Persons	32,541	5.7%	26,960	4.9%	-17.2%
Six Persons	11,844	2.1%	10,017	1.8%	-15.4%
Seven Persons or More	6,809	1.2%	6,123	1.1%	-10.1%
Total	571,457	100.0%	545,056	100.0%	-4.6%

Table 12.A.13
Household Type by Tenure
 12. Cuyahoga County
 2000 & 2010 Census SF1 Data

Household Type	2000 Census		2010 Census		% Change 00–10
	Households	% of Total	Households	% of Total	
Family Households	354,615	62.1%	319,996	58.7%	-9.8%
Married-Couple Family	242,389	68.4%	204,401	63.9%	-15.7%
Owner-Occupied	203,106	83.8%	171,771	84.0%	-15.4%
Renter-Occupied	39,283	16.2%	32,630	16.0%	-16.9%
Other Family	112,226	31.6%	115,595	36.1%	3.0%
Male Householder, No Spouse	22,433	20.0%	24,307	21.0%	8.4%
Owner-Occupied	13,192	58.8%	13,420	55.2%	1.7%
Renter-Occupied	9,241	41.2%	10,887	44.8%	17.8%
Female Householder, No Spouse	89,793	80.0%	91,288	79.0%	1.7%
Owner-Occupied	42,943	47.8%	39,928	43.7%	-7.0%
Renter-Occupied	46,850	52.2%	51,360	56.3%	9.6%
Non-Family Households	216,842	37.9%	225,060	41.3%	3.8%
Owner-Occupied	101,739	46.9%	106,757	47.4%	4.9%
Renter-Occupied	115,103	53.1%	118,303	52.6%	2.8%
Total	571,457	100.0%	545,056	100.0%	-4.6%

Table 12.A.14
Group Quarters Population
 12. Cuyahoga County
 2000 & 2010 Census SF1 Data

Group Quarters Type	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Institutionalized					
Correctional Institutions	3,134	18.2%	3,135	20.3%	.0%
Juvenile Facilities	.	.	1,158	7.5%	.
Nursing Homes	12,232	71.2%	10,958	70.9%	-10.4%
Other Institutions	1,820	10.6%	214	1.4%	-88.2%
Total	17,186	100.0%	15,465	100.0%	-10.0%
Noninstitutionalized					
College Dormitories	6,651	51.2%	8,268	60.0%	24.3%
Military Quarters	5	.0%	0	.0%	-100.0%
Other Noninstitutional	6,336	48.8%	5,518	40.0%	-12.9%
Total	12,992	43.1%	13,786	47.1%	6.1%
Total Group Quarters Population	30,178	100.0%	29,251	100.0%	-3.1%

Table 12.A.15
Overcrowding and Severe Overcrowding
 12. Cuyahoga County
 2000 Census SF3 & 2010 Five-Year ACS Data

Data Source	No Overcrowding		Overcrowding		Severe Overcrowding		Total
	Households	% of Total	Households	% of Total	Households	% of Total	
Owner							
2000 Census	357,565	99.1%	2,737	.8%	686	.2%	360,988
2010 ACS	334,208	99.5%	1,651	.5%	196	.1%	336,055
Renter							
2000 Census	203,688	96.8%	4,573	2.2%	2,208	1.0%	210,469
2010 ACS	199,460	98.3%	2,560	1.3%	869	.4%	202,889
Total							
2000 Census	561,253	98.2%	7,310	1.3%	2,894	.5%	571,457
2010 ACS	533,668	99.0%	4,211	.8%	1,065	.2%	538,944

Table 12.A.16
Households with Incomplete Plumbing Facilities
 12. Cuyahoga County
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Plumbing Facilities	568,868	536,043
Lacking Complete Plumbing Facilities	2,589	2,901
Total Households	571,457	538,944
Percent Lacking	.5%	.5%

Table 12.A.17
Households with Incomplete Kitchen Facilities
 12. Cuyahoga County
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Kitchen Facilities	567,819	533,284
Lacking Complete Kitchen Facilities	3,638	5,660
Total Households	571,457	538,944
Percent Lacking	.6%	1.1%

Table 12.A.18
Cost Burden and Severe Cost Burden by Tenure
 12. Cuyahoga County
 2000 Census & 2010 Five-Year ACS Data

Data Source	Less Than 30%		31%-50%		Above 50%		Not Computed		Total
	Households	% of Total	Households	% of Total	Households	% of Total	Households	% of Total	
Owner With a Mortgage									
2000 Census	155,278	71.6%	38,981	18.0%	21,452	9.9%	1,087	.5%	216,798
2010 ACS	144,157	62.7%	51,571	22.4%	33,269	14.5%	956	.4%	229,953
Owner Without a Mortgage									
2000 Census	89,047	86.3%	7,850	7.6%	4,765	4.6%	1,526	1.5%	103,188
2010 ACS	83,005	78.2%	13,532	12.8%	8,554	8.1%	1,011	1.0%	106,102
Renter									
2000 Census	117,319	55.9%	38,336	18.3%	40,302	19.2%	13,966	6.7%	209,923
2010 ACS	91,385	45.0%	43,391	21.4%	53,817	26.5%	14,296	7.0%	202,889
Total									
2000 Census	361,644	68.2%	85,167	16.1%	66,519	12.6%	16,579	3.1%	529,909
2010 ACS	318,547	59.1%	108,494	20.1%	95,640	17.7%	16,263	3.0%	538,944

Table 12.A.19
Median Housing Costs
 12. Cuyahoga County
 2000 Census SF3 & 2010 Five-Year ACS Data

Housing Cost	2000 Census	2010 ACS
Median Contract Rent	\$463	\$578
Median Home Value	\$113,800	\$137,200

B. BEA DATA

This section contains additional Bureau of Economic Analysis (BEA) data that address employment and income.

Table 12.B.1
Employment by Industry
 12. Cuyahoga County
 Select Years 2001–2010 BEA Data

NAICS Categories	2001	2005	2006	2007	2008	2009	2010	% Change 01–10
Farm employment	362	279	277	275	231	242	236	-34.8%
Forestry, fishing, related activities, and other	326	(D) ⁵⁵	(D)	(D)	(D)	(D)	(D)	.
Mining	751	(D)	(D)	(D)	(D)	(D)	(D)	.
Utilities	2,155	1,563	1,594	1,675	1,690	1,569	1,422	-34.0%
Construction	37,072	35,957	35,637	35,808	34,659	31,648	29,989	-19.1%
Manufacturing	109,315	88,515	87,737	84,329	81,301	70,484	69,588	-36.3%
Wholesale trade	47,819	44,704	45,795	45,118	43,612	40,464	39,618	-17.2%
Retail trade	91,007	81,280	79,553	78,726	77,282	73,690	72,154	-20.7%
Transportation and warehousing	28,624	28,057	28,345	28,881	27,975	25,943	25,461	-11.1%
Information	22,716	18,622	18,212	18,154	17,732	16,383	15,688	-30.9%
Finance and insurance	64,831	61,199	60,862	61,206	60,196	60,836	60,794	-6.2%
Real estate and rental and leasing	32,537	36,292	35,697	35,516	35,578	35,312	35,210	8.2%
Professional and technical services	66,662	65,303	66,706	68,848	69,255	64,936	63,344	-5.0%
Management of companies and enterprises	15,104	18,767	19,944	18,847	18,884	17,925	17,741	17.5%
Administrative and waste services	59,757	59,311	60,183	61,242	58,302	53,758	56,288	-5.8%
Educational services	23,810	28,205	28,575	28,822	29,406	31,355	31,696	33.1%
Health care and social assistance	113,220	121,373	125,207	128,519	130,462	133,535	136,137	20.2%
Arts, entertainment, and recreation	17,334	17,172	17,251	17,929	17,784	18,011	18,023	4.0%
Accommodation and food services	57,708	56,254	57,639	56,714	55,612	53,456	53,390	-7.5%
Other services, except public administration	46,265	43,893	43,946	44,145	44,095	43,137	42,111	-9.0%
Government and government enterprises	109,603	105,710	105,687	106,972	106,730	104,819	103,804	-5.3%
Total	946,978	913,538	920,031	922,863	912,102	878,840	874,068	-7.7%

⁵⁵ (D): These data are not shown to avoid disclosure of confidential information, but estimates are included in the totals.

Table 12.B.2
Real Earnings by Industry

12. Cuyahoga County
 Select Years 2001–2010 BEA Data, Real 2011 Dollars

NAICS Categories	2001	2005	2006	2007	2008	2009	2010	% Change 00–10
Farm earnings	12,226	8,796	5,882	8,022	6,711	8,088	5,314	-56.5%
Forestry, fishing, related activities, and other	9,996	(D) ⁵⁶	(D)	(D)	(D)	(D)	(D)	.
Mining	266,814	(D)	(D)	(D)	(D)	(D)	(D)	.
Utilities	192,189	172,173	170,269	171,826	200,044	183,398	162,775	-15.3%
Construction	2,450,535	2,254,579	2,258,473	2,096,183	2,031,573	1,815,877	1,759,709	-28.2%
Manufacturing	8,155,004	7,109,446	7,053,329	6,773,965	7,108,163	5,626,527	6,359,034	-22.0%
Wholesale trade	3,811,007	3,730,725	3,866,261	3,914,761	3,757,987	3,385,525	3,462,605	-9.1%
Retail trade	3,024,197	2,648,736	2,553,980	2,564,262	2,354,923	2,261,735	2,269,838	-24.9%
Transportation and warehousing	1,535,552	1,817,889	1,758,957	1,717,636	1,648,510	1,509,618	1,531,499	-.3%
Information	1,482,629	1,315,441	1,267,272	1,270,577	1,233,257	1,106,070	1,087,837	-26.6%
Finance and insurance	4,719,048	4,684,604	4,800,019	4,666,415	4,242,933	4,204,410	4,133,675	-12.4%
Real estate and rental and leasing	1,268,446	1,335,578	1,128,075	960,327	1,144,788	1,237,925	1,148,744	-9.4%
Professional and technical services	5,692,576	5,331,134	5,421,961	5,569,972	5,863,775	5,242,281	5,226,012	-8.2%
Management of companies and enterprises	1,408,419	1,854,415	2,080,770	2,027,736	1,959,910	1,728,678	1,920,434	36.4%
Administrative and waste services	1,912,394	2,020,036	2,099,490	2,225,368	2,073,647	1,826,366	1,963,077	2.7%
Educational services	925,053	1,065,279	1,074,074	1,039,804	1,055,978	1,088,886	1,077,143	16.4%
Health care and social assistance	5,782,423	6,346,035	6,670,267	6,529,355	6,849,292	7,066,338	7,291,592	26.1%
Arts, entertainment, and recreation	786,617	728,450	715,599	751,354	774,345	769,898	800,200	1.7%
Accommodation and food services	1,290,148	1,277,109	1,280,335	1,290,094	1,205,444	1,148,586	1,209,402	-6.3%
Other services, except public administration	1,674,261	1,577,494	1,526,755	1,522,811	1,470,595	1,407,504	1,407,029	-16.0%
Government and government enterprises	6,924,450	7,278,163	7,154,430	7,223,754	7,250,852	7,259,087	7,251,915	4.7%
Total	53,323,985	52,811,577	53,213,231	52,571,531	53,032,303	49,021,181	50,239,286	-5.8%

⁵⁶ (D): These data are not shown to avoid disclosure of confidential information, but estimates are included in the totals.

Table 12.B.3
Real Earnings Per Job by Industry
 12. Cuyahoga County
 Select Years 2001–2010 BEA Data, 1,000's of Real 2011 Dollars

NAICS Categories	2001	2005	2006	2007	2008	2009	2010	% Change 00–10
Farm earnings	33,774	31,526	21,233	29,170	29,052	33,422	22,517	-33.3%
Forestry, fishing, related activities, and other	30,662	(D) ⁵⁷	(D)	(D)	(D)	(D)	(D)	.
Mining	355,278	(D)	(D)	(D)	(D)	(D)	(D)	.
Utilities	89,183	110,155	106,819	102,583	118,369	116,888	114,469	28.4%
Construction	66,102	62,702	63,374	58,540	58,616	57,377	58,678	-11.2%
Manufacturing	74,601	80,319	80,392	80,328	87,430	79,827	91,381	22.5%
Wholesale trade	79,697	83,454	84,425	86,767	86,169	83,668	87,400	9.7%
Retail trade	33,230	32,588	32,104	32,572	30,472	30,693	31,458	-5.3%
Transportation and warehousing	53,646	64,793	62,055	59,473	58,928	58,190	60,151	12.1%
Information	65,268	70,639	69,584	69,989	69,550	67,513	69,342	6.2%
Finance and insurance	72,790	76,547	78,867	76,241	70,485	69,111	67,995	-6.6%
Real estate and rental and leasing	38,985	36,801	31,601	27,039	32,177	35,057	32,626	-16.3%
Professional and technical services	85,395	81,637	81,281	80,902	84,669	80,730	82,502	-3.4%
Management of companies and enterprises	93,248	98,813	104,331	107,589	103,787	96,439	108,248	16.1%
Administrative and waste services	32,003	34,058	34,885	36,337	35,567	33,974	34,876	9.0%
Educational services	38,851	37,769	37,588	36,077	35,910	34,728	33,984	-12.5%
Health care and social assistance	51,072	52,285	53,274	50,805	52,500	52,917	53,561	4.9%
Arts, entertainment, and recreation	45,380	42,421	41,482	41,907	43,542	42,746	44,399	-2.2%
Accommodation and food services	22,356	22,703	22,213	22,747	21,676	21,487	22,652	1.3%
Other services, except public administration	36,189	35,940	34,742	34,496	33,351	32,629	33,412	-7.7%
Government and government enterprises	63,178	68,850	67,695	67,529	67,936	69,254	69,862	10.6%
Average	56,310	57,810	57,838	56,966	58,143	55,779	57,477	2.07%

⁵⁷ (D): These data are not shown to avoid disclosure of confidential information, but estimates are included in the totals.

Table 12.B.4
Total Employment and Real Personal Income
 12. Cuyahoga County
 1969–2010 BEA Data, 2011 Dollars

Year	1,000s of 2011 Dollars						Per Capita Income	Total Employment	Real Average Earnings Per Job
	Earnings	Social Security Contributions	Residents Adjustments	Dividends, Interest, Rents	Transfer Payments	Personal Income			
1969	37,626,992	2,560,491	-4,508,634	5,539,185	2,696,500	38,793,552	22,717	896,908	41,953
1970	36,088,967	2,403,679	-4,003,588	5,615,752	3,022,162	38,319,614	22,301	877,418	41,133
1971	35,089,346	2,399,412	-3,947,056	5,641,109	3,435,787	37,819,774	22,150	841,877	41,682
1972	36,506,899	2,632,440	-4,269,343	5,680,995	3,619,931	38,906,042	23,296	847,513	43,074
1973	38,308,891	3,199,688	-4,652,378	5,876,976	3,936,684	40,270,484	24,501	873,787	43,844
1974	38,114,070	3,275,080	-4,821,798	6,128,390	4,212,342	40,357,923	24,955	885,121	43,062
1975	35,843,178	3,000,153	-4,649,812	5,845,086	4,660,598	38,698,896	24,258	852,485	42,046
1976	37,373,994	3,190,730	-5,090,777	5,824,609	4,648,334	39,565,431	25,073	856,633	43,629
1977	39,460,714	3,341,526	-5,653,600	6,003,555	4,600,894	41,070,037	26,343	871,192	45,296
1978	41,037,417	3,585,258	-6,153,732	6,318,126	4,643,318	42,259,871	27,466	893,821	45,914
1979	40,961,089	3,728,714	-6,358,515	6,625,777	4,800,946	42,300,583	27,935	897,067	45,662
1980	38,987,718	3,526,924	-6,319,489	7,244,015	5,479,117	41,864,437	27,973	879,010	44,354
1981	37,880,837	3,659,240	-6,247,939	8,132,117	5,559,976	41,665,752	28,042	860,945	44,000
1982	36,198,371	3,545,512	-5,963,301	8,565,608	5,987,202	41,242,369	27,967	830,049	43,610
1983	35,952,036	3,587,097	-5,844,352	8,864,755	6,228,651	41,613,993	28,269	813,255	44,208
1984	37,959,559	3,884,727	-6,187,306	9,643,377	6,294,804	43,825,707	29,875	832,740	45,584
1985	39,323,691	4,096,247	-6,476,988	9,861,550	6,446,689	45,058,695	30,893	845,055	46,534
1986	40,190,512	4,325,210	-6,635,512	9,825,990	6,677,654	45,733,433	31,571	856,320	46,935
1987	41,260,291	4,443,379	-6,790,983	9,732,028	6,709,560	46,467,517	32,293	867,569	47,559
1988	43,295,773	4,756,702	-7,016,457	9,954,488	6,734,852	48,211,953	33,916	886,353	48,847
1989	43,768,997	4,872,623	-7,255,586	10,309,238	6,913,051	48,863,076	34,472	902,223	48,512
1990	44,448,255	5,051,825	-7,376,605	11,226,040	7,292,122	50,537,986	35,783	907,255	48,992
1991	43,379,363	5,024,539	-7,205,062	10,743,312	7,502,246	49,395,320	34,843	892,250	48,617
1992	44,104,722	5,083,625	-7,272,798	10,135,305	7,893,922	49,777,526	34,986	875,451	50,379
1993	44,402,560	5,155,832	-7,293,869	10,302,379	8,082,912	50,338,150	35,277	880,866	50,408
1994	46,095,735	5,415,255	-7,725,685	10,252,378	8,146,314	51,353,486	36,005	896,619	51,411
1995	47,090,451	5,569,490	-8,024,970	10,509,108	8,401,706	52,406,804	36,838	913,825	51,531
1996	47,323,240	5,560,256	-8,240,915	10,987,891	8,419,328	52,929,288	37,317	923,337	51,253
1997	49,104,531	5,666,034	-8,926,551	11,238,119	8,491,552	54,241,618	38,440	937,198	52,395
1998	51,176,294	5,736,025	-9,381,636	12,236,124	8,430,644	56,725,401	40,355	949,854	53,878
1999	53,105,186	5,887,012	-10,035,333	11,598,209	8,496,594	57,277,644	40,919	959,233	55,362
2000	54,762,561	5,837,768	-10,518,270	11,697,039	8,751,307	58,854,870	42,282	965,522	56,718
2001	53,323,985	5,698,933	-10,397,469	11,121,964	9,134,130	57,483,677	41,579	946,978	56,310
2002	52,688,988	5,481,168	-10,129,890	10,720,617	9,469,823	57,268,369	41,756	924,881	56,968
2003	53,287,541	5,564,678	-10,225,540	9,152,943	9,624,705	56,274,970	41,381	917,199	58,098
2004	54,105,765	5,711,545	-10,355,870	9,306,471	9,686,886	57,031,708	42,349	917,084	58,997
2005	52,811,577	5,591,450	-10,199,437	9,385,645	9,730,196	56,136,532	42,188	913,538	57,810
2006	53,213,231	5,677,648	-10,436,846	10,145,090	9,797,355	57,041,182	43,450	920,031	57,838
2007	52,571,531	5,637,942	-10,481,568	10,380,117	10,057,901	56,890,039	43,710	922,863	56,966
2008	53,032,303	5,747,104	-10,306,783	10,732,550	10,445,813	58,156,779	45,031	912,102	58,143
2009	49,021,181	5,501,065	-9,882,164	8,364,818	11,489,614	53,492,385	41,626	878,840	55,779
2010	50,239,286	5,562,099	-10,232,266	8,455,831	11,802,117	54,702,868	42,804	874,068	57,477

C. BLS DATA

This section contains Bureau of Labor Statistics (BLS) data that address employment and income.

Table 12.C.1
Labor Force Statistics
 12. Cuyahoga County
 1990–2011 BLS Data

Year	Labor Force	Employment	Unemployment	Unemployment Rate	Statewide Unemployment Rate
1990	677,607	639,379	38,228	5.6%	5.7%
1991	663,998	619,728	44,270	6.7%	6.6%
1992	671,730	619,014	52,716	7.8%	7.4%
1993	679,108	628,337	50,771	7.5%	6.7%
1994	685,303	638,829	46,474	6.8%	5.6%
1995	684,658	647,781	36,877	5.4%	4.9%
1996	685,683	652,270	33,413	4.9%	5.0%
1997	693,427	661,025	32,402	4.7%	4.6%
1998	697,497	667,360	30,137	4.3%	4.3%
1999	702,532	671,913	30,619	4.4%	4.3%
2000	693,708	665,553	28,155	4.1%	4.0%
2001	690,916	660,028	30,888	4.5%	4.4%
2002	685,574	646,908	38,666	5.6%	5.7%
2003	680,423	638,274	42,149	6.2%	6.2%
2004	671,200	629,251	41,949	6.2%	6.1%
2005	663,028	623,254	39,774	6.0%	5.9%
2006	656,783	619,187	37,596	5.7%	5.4%
2007	657,660	616,122	41,538	6.3%	5.6%
2008	653,429	607,728	45,701	7.0%	6.5%
2009	637,832	580,664	57,168	9.0%	10.1%
2010	643,453	585,634	57,819	9.0%	10.0%
2011	644,854	593,380	51,474	8.0%	8.6%

D. HMDA DATA

The Home Mortgage Disclosure Act (HMDA) requires both depository and non-depository lenders to collect and publicly disclose information about housing-related loans and loan applications.⁵⁸ The information presented in this section presents detailed HMDA data, including denial rates and predatory lending including high annual percentage rate (APR) loans.

Table 12.D.1
Purpose of Loan by Year
12. Cuyahoga County
2004–2011 HMDA Data

Purpose	2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	42,075	49,588	48,621	30,657	19,679	17,928	15,067	13,261	236,876
Home Improvement	10,397	10,993	11,555	10,848	8,236	5,040	3,784	4,029	64,882
Refinancing	75,293	71,474	54,630	40,085	26,895	33,245	30,902	28,062	360,586
Total	127,765	132,055	114,806	81,590	54,810	56,213	49,753	45,352	662,344

Table 12.D.2
Occupancy Status for Home Purchase Loan Applications
12. Cuyahoga County
2004–2011 HMDA Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	Total
Owner-Occupied	35,722	40,951	39,106	25,353	17,660	17,066	14,355	12,456	202,669
Not Owner-Occupied	6,038	8,428	9,374	5,178	1,980	838	658	781	33,275
Not Applicable	315	209	141	126	39	24	54	24	932
Total	42,075	49,588	48,621	30,657	19,679	17,928	15,067	13,261	236,876

Table 12.D.3
Owner-Occupied Home Purchase Loan Applications by Loan Type
12. Cuyahoga County
2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Conventional	31,295	37,019	35,946	22,028	9,356	6,864	5,732	5,478	153,718
FHA - Insured	3,970	3,466	2,826	2,995	7,817	9,644	8,119	6,435	45,272
VA - Guaranteed	457	465	334	329	486	552	504	542	3,669
Rural Housing Service or Farm Service Agency	0	1	0	1	1	6	0	1	10
Total	35,722	40,951	39,106	25,353	17,660	17,066	14,355	12,456	202,669

⁵⁸ Data are considered “raw” because they contain entry errors and incomplete loan applications. Starting in 2004, the HMDA data made substantive changes in reporting. It modified the way it handled Hispanic data, loan interest rates, and the reporting of multifamily loan applications.

DENIAL RATES

Table 12.D.4
Loan Applications by Action Taken
 12. Cuyahoga County
 2004–2011 HMDA Data

Action	2004	2005	2006	2007	2008	2009	2010	2011	Total
Loan Originated	20,082	21,764	18,810	12,714	9,250	8,418	7,277	6,127	104,442
Application Approved but not Accepted	2,764	2,667	2,476	1,458	674	402	405	335	11,181
Application Denied	3,647	5,417	6,255	3,775	1,966	1,216	1,078	1,087	24,441
Application Withdrawn by Applicant	2,420	2,967	2,853	1,226	970	794	725	685	12,640
File Closed for Incompleteness	589	652	602	483	273	173	204	131	3,107
Loan Purchased by the Institution	6,220	7,413	8,077	5,664	4,508	6,058	4,665	4,091	46,696
Preapproval Request Denied	0	71	33	33	19	5	1	0	162
Preapproval Approved but not Accepted	0	0	0	0	0	0	0	0	0
Total	35,722	40,951	39,106	25,353	17,660	17,066	14,355	12,456	202,669
Denial Rate	15.4%	19.9%	25.0%	22.9%	17.5%	12.6%	12.9%	15.1%	19.0%

Table 12.D.5
Denial Rates by Gender of Applicant
 12. Cuyahoga County
 2004–2011 HMDA Data

Year	Male	Female	Not Available	Not Applicable	Average
2004	13.1%	16.5%	44.3%	16.7%	15.4%
2005	17.4%	22.2%	37.1%	.0%	19.9%
2006	21.9%	28.2%	36.2%	.0%	25.0%
2007	19.8%	26.6%	32.3%	42.9%	22.9%
2008	15.8%	19.3%	24.9%	33.3%	17.5%
2009	11.4%	13.1%	26.2%	.0%	12.6%
2010	11.3%	14.8%	18.9%	.0%	12.9%
2011	13.8%	16.3%	21.0%	.0%	15.1%
Average	16.6%	21.2%	32.7%	17.8%	19.0%

Table 12.D.6
Loan Applications by Selected Action Taken by Gender of Applicant
 12. Cuyahoga County
 2004–2011 HMDA Data

Gender		2004	2005	2006	2007	2008	2009	2010	2011	Total
Male	Originated	12,384	13,055	11,159	7,753	5,497	5,041	4,373	3,679	62,941
	Denied	1,863	2,750	3,134	1,920	1,032	649	555	589	12,492
	Denial Rate	13.1%	17.4%	21.9%	19.8%	15.8%	11.4%	11.3%	13.8%	16.6%
Female	Originated	7,251	8,078	6,971	4,466	3,374	3,082	2,559	2,123	37,904
	Denied	1,434	2,300	2,737	1,618	807	463	443	412	10,214
	Denial Rate	16.5%	22.2%	28.2%	26.6%	19.3%	13.1%	14.8%	16.3%	21.2%
Not Available	Originated	437	622	676	491	373	293	344	324	3,560
	Denied	348	367	384	234	124	104	80	86	1,727
	Denial Rate	44.3%	37.1%	36.2%	32.3%	24.9%	26.2%	18.9%	21.0%	32.7%
Not Applicable	Originated	10	9	4	4	6	2	1	1	37
	Denied	2	0	0	3	3	0	0	0	8
	Denial Rate	16.7%	.0%	.0%	42.9%	33.3%	.0%	.0%	.0%	17.8%
Total	Originated	20,082	21,764	18,810	12,714	9,250	8,418	7,277	6,127	104,442
	Denied	3,647	5,417	6,255	3,775	1,966	1,216	1,078	1,087	24,441
	Denial Rate	15.4%	19.9%	25.0%	22.9%	17.5%	12.6%	12.9%	15.1%	19.0%

Table 12.D.7
Denial Rates by Race/Ethnicity of Applicant
 12. Cuyahoga County
 2004–2011 HMDA Data

Race/Ethnicity	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	23.2%	34.1%	27.1%	26.1%	23.7%	9.1%	23.5%	23.1%	26.0%
Asian	9.0%	10.2%	13.6%	11.7%	13.2%	14.9%	11.7%	16.7%	12.1%
Black	25.3%	34.3%	44.0%	44.5%	33.5%	23.7%	23.8%	28.1%	35.4%
White	9.9%	12.7%	13.7%	13.2%	12.0%	9.3%	9.8%	11.7%	11.8%
Not Available	35.2%	33.3%	39.1%	33.3%	25.1%	21.7%	20.5%	21.6%	31.9%
Not Applicable	11.5%	.0%	.0%	60.0%	14.3%	0.0%	0.0%	.0%	12.0%
Average	15.4%	19.9%	25.0%	22.9%	17.5%	12.6%	12.9%	15.1%	19.0%
Non-Hispanic	%	%	%	%	%	%	%	%	%
Hispanic	17.5%	23.6%	25.8%	24.7%	22.9%	14.5%	18.6%	15.2%	21.5%

Table 12.D.8
Loan Applications by Selected Action Taken by Race/Ethnicity of Applicant
 12. Cuyahoga County
 2004–2011 HMDA Data

Race		2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Originated	73	58	51	34	29	20	13	10	288
	Denied	22	30	19	12	9	2	4	3	101
	Denial Rate	23.2%	34.1%	27.1%	26.1%	23.7%	23.5%	23.5%	23.1%	26.0%
Asian	Originated	523	601	463	392	264	279	250	215	2,987
	Denied	52	68	73	52	40	49	33	43	410
	Denial Rate	9.0%	10.2%	13.6%	11.7%	13.2%	14.9%	11.7%	16.7%	12.1%
Black	Originated	3,775	4,490	4,187	2,350	1,537	1,160	962	709	19,170
	Denied	1,278	2,343	3,289	1,887	776	361	301	277	10,512
	Denial Rate	25.3%	34.3%	44.0%	44.5%	33.5%	23.7%	23.8%	28.1%	35.4%
White	Originated	14,357	15,036	12,796	9,037	6,777	6,429	5,497	4,660	74,589
	Denied	1,581	2,192	2,034	1,372	927	658	597	618	9,979
	Denial Rate	9.9%	12.7%	13.7%	13.2%	12.0%	9.3%	9.8%	11.7%	11.8%
Not Available	Originated	1,300	1,570	1,308	899	637	528	554	531	7,327
	Denied	707	784	840	449	213	146	143	146	3,428
	Denial Rate	35.2%	33.3%	39.1%	33.3%	25.1%	21.7%	20.5%	21.6%	31.9%
Not Applicable	Originated	54	9	5	2	6	2	1	2	81
	Denied	7	0	0	3	1	0	0	0	11
	Denial Rate	35.2%	33.3%	39.1%	33.3%	25.1%	21.7%	20.5%	21.6%	12.0%
Total	Originated	20,082	21,764	18,810	12,714	9,250	8,418	7,277	6,127	104,442
	Denied	3,647	5,417	6,255	3,775	1,966	1,216	1,078	1,087	24,441
	Denial Rate	15.4%	19.9%	25.0%	22.9%	17.5%	12.6%	12.9%	15.1%	19.0%
Non-Hispanic	Originated	16,441	19,322	16,975	11,441	8,368	7,650	6,543	5,434	92,174
	Denied	2,531	4,346	5,190	3,163	1,675	1,020	894	916	19,735
	Denial Rate	13.3%	18.4%	23.4%	21.7%	16.7%	11.8%	12.0%	14.4%	17.6%
Hispanic	Originated	562	590	562	393	243	254	210	207	3,021
	Denied	119	182	195	129	72	43	48	37	825
	Denial Rate	17.5%	23.6%	25.8%	24.7%	22.9%	14.5%	18.6%	15.2%	21.5%

Table 12.D.9
Loan Applications by Reason for Denial
 12. Cuyahoga County
 2004–2011 HMDA Data

Denial Reason	2004	2005	2006	2007	2008	2009	2010	2011	Total
Debt-to-Income Ratio	480	617	640	604	345	267	257	240	3,450
Employment History	44	48	73	49	40	30	30	36	350
Credit History	752	896	1,078	877	450	291	265	244	4,853
Collateral	288	417	512	420	355	264	194	203	2,653
Insufficient Cash	73	72	105	75	48	38	41	29	481
Unverifiable Information	91	165	278	220	100	45	45	43	987
Credit Application Incomplete	339	438	347	393	134	69	85	119	1,924
Mortgage Insurance Denied	0	1	5	4	11	6	7	3	37
Other	747	1,522	1,181	550	215	103	92	77	4,487
Missing	833	1,241	2,036	583	268	103	62	93	5,219
Total	3,647	5,417	6,255	3,775	1,966	1,216	1,078	1,087	24,441

Table 12.D.10
Denial Rates by Income of Applicant
 12. Cuyahoga County
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	53.3%	65.4%	55.5%	54.8%	58.1%	57.4%	50.0%	62.7%	57.3%
\$15,001–\$30,000	24.3%	32.9%	40.6%	37.9%	29.2%	20.5%	22.1%	23.2%	30.6%
\$30,001–\$45,000	17.5%	21.7%	28.6%	27.6%	20.0%	13.2%	14.9%	17.8%	21.6%
\$45,001–\$60,000	14.3%	19.4%	25.7%	22.1%	17.7%	11.5%	10.3%	13.7%	18.5%
\$60,001–\$75,000	12.0%	15.6%	21.1%	19.4%	14.5%	10.0%	12.0%	11.7%	15.6%
Above \$75,000	8.6%	11.9%	15.9%	13.5%	10.2%	8.2%	7.4%	10.4%	11.5%
Data Missing	20.6%	24.8%	19.8%	26.7%	25.0%	16.5%	34.6%	25.0%	22.6%
Total	15.4%	19.9%	25.0%	22.9%	17.5%	12.6%	12.9%	15.1%	19.0%

Table 12.D.11
Denial Rates of Loans by Race/Ethnicity and Income of Applicant
 12. Cuyahoga County
 2004–2011 HMDA Data

Race	<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	Above \$75K	Data Missing	Average
American Indian	33.3%	40.3%	24.7%	18.6%	15.4%	24.1%	41.7%	26.0%
Asian	63.6%	24.0%	13.5%	10.7%	12.8%	8.7%	16.5%	12.1%
Black	70.8%	41.3%	34.1%	33.1%	31.0%	32.6%	42.5%	35.4%
White	49.5%	20.1%	13.4%	11.7%	10.4%	7.9%	13.3%	11.8%
Not Available	58.7%	46.6%	36.0%	31.1%	27.9%	18.6%	52.6%	31.9%
Not Applicable	%	18.2%	12.5%	9.1%	11.1%	2.7%	50.0%	12.0%
Average	57.3%	30.6%	21.6%	18.5%	15.6%	11.5%	22.6%	19.0%
Non-Hispanic Ethnicity	57.5%	29.2%	20.2%	17.2%	14.5%	10.8%	18.3%	17.6%
Hispanic (Ethnicity)	43.7%	26.1%	22.6%	18.6%	19.5%	12.6%	25.5%	21.5%

Table 12.D.12
Loan Applications by Reason for Denial by Race/Ethnicity of Applicant
 12. Cuyahoga County
 2004–2011 HMDA Data

Denial Reason	American Indian	Asian	Black	White	Not Available	Not Applicable	Total	Hispanic (Ethnicity)
Debt-to-Income Ratio	14	76	1,418	1,575	366	1	3,450	124
Employment History	1	13	115	192	29	0	350	15
Credit History	27	68	2,233	1,975	548	2	4,853	197
Collateral	14	55	931	1,368	283	2	2,653	99
Insufficient Cash	2	8	169	242	60	0	481	19
Unverifiable Information	5	24	418	430	108	2	987	33
Credit Application Incomplete	5	45	643	954	276	1	1,924	53
Mortgage Insurance Denied	1	3	11	18	4	0	37	2
Other	21	72	2,069	1,662	662	1	4,487	147
Missing	11	46	2,505	1,563	1,092	2	5,219	136
Total	101	410	10,512	9,979	3,428	11	24,441	825
% Missing	10.9%	11.2%	23.8%	15.7%	31.9%	18.2%	21.4%	16.5%

Table 12.D.13
Loan Applications by Income of Applicant: Originated and Denied
 12. Cuyahoga County
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Loan Originated	71	66	81	57	39	46	50	25	435
	Application Denied	81	125	101	69	54	62	50	42	584
	Denial Rate	53.3%	65.4%	55.5%	54.8%	58.1%	57.4%	50.0%	62.7%	57.3%
\$15,001–\$30,000	Loan Originated	2,456	2,362	1,712	1,302	949	1,026	859	723	11,389
	Application Denied	788	1,159	1,170	794	392	264	243	219	5,029
	Denial Rate	24.3%	32.9%	40.6%	37.9%	29.2%	20.5%	22.1%	23.2%	30.6%
\$30,001–\$45,000	Loan Originated	4,947	5,588	4,484	2,891	2,257	2,117	1,573	1,258	25,115
	Application Denied	1,050	1,545	1,799	1,100	564	321	276	272	6,927
	Denial Rate	17.5%	21.7%	28.6%	27.6%	20.0%	13.2%	14.9%	17.8%	21.6%
\$45,001–\$60,000	Loan Originated	4,050	4,309	3,770	2,426	1,871	1,745	1,357	1,093	20,621
	Application Denied	676	1,037	1,304	690	403	227	156	174	4,667
	Denial Rate	14.3%	19.4%	25.7%	22.1%	17.7%	11.5%	10.3%	13.7%	18.5%
\$60,001–\$75,000	Loan Originated	2,490	2,720	2,370	1,500	1,105	971	829	718	12,703
	Application Denied	338	504	634	361	188	108	113	95	2,341
	Denial Rate	12.0%	15.6%	21.1%	19.4%	14.5%	10.0%	12.0%	11.7%	15.6%
Above \$75,000	Loan Originated	5,199	5,998	5,697	4,294	2,939	2,417	2,539	2,235	31,318
	Application Denied	489	809	1,075	672	335	215	203	260	4,058
	Denial Rate	8.6%	11.9%	15.9%	13.5%	10.2%	8.2%	7.4%	10.4%	11.5%
Data Missing	Loan Originated	869	721	696	244	90	96	70	75	2,861
	Application Denied	225	238	172	89	30	19	37	25	835
	Denial Rate	20.6%	24.8%	19.8%	26.7%	25.0%	16.5%	34.6%	25.0%	22.6%
Total	Loan Originated	20,082	21,764	18,810	12,714	9,250	8,418	7,277	6,127	104,442
	Application Denied	3,647	5,417	6,255	3,775	1,966	1,216	1,078	1,087	24,441
	Denial Rate	15.4%	19.9%	25.0%	22.9%	17.5%	12.6%	12.9%	15.1%	19.0%

Table 12.D.14
Loan Applications by Income and Race/Ethnicity of Applicant: Originated and Denied
 12. Cuyahoga County
 2004–2011 HMDA Data

Race		<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	> \$75K	Data Missing	Total
American Indian	Loan Originated	2	46	64	70	33	66	7	288
	Application Denied	1	31	21	16	6	21	5	101
	Denial Rate	33.3%	40.3%	24.7%	18.6%	15.4%	24.1%	41.7%	26.0%
Asian	Loan Originated	8	212	476	461	354	1,410	66	2,987
	Application Denied	14	67	74	55	52	135	13	410
	Denial Rate	63.6%	24.0%	13.5%	10.7%	12.8%	8.7%	16.5%	12.1%
Black	Loan Originated	87	3,638	6,558	4,162	1,925	2,511	289	19,170
	Application Denied	211	2,555	3,392	2,060	863	1,217	214	10,512
	Denial Rate	70.8%	41.3%	34.1%	33.1%	31.0%	32.6%	42.5%	35.4%
White	Loan Originated	279	6,686	16,383	14,567	9,574	24,832	2,268	74,589
	Application Denied	274	1,677	2,527	1,926	1,106	2,122	347	9,979
	Denial Rate	49.5%	20.1%	13.4%	11.7%	10.4%	7.9%	13.3%	11.8%
Not Available	Loan Originated	59	798	1,620	1,351	809	2,463	227	7,327
	Application Denied	84	697	911	609	313	562	252	3,428
	Denial Rate	58.7%	46.6%	36.0%	31.1%	27.9%	18.6%	52.6%	31.9%
Not Applicable	Loan Originated	0	9	14	10	8	36	4	81
	Application Denied	0	2	2	1	1	1	4	11
	Denial Rate	%	18.2%	12.5%	9.1%	11.1%	2.7%	50.0%	12.0%
Total	Loan Originated	435	11,389	25,115	20,621	12,703	31,318	2,861	104,442
	Application Denied	584	5,029	6,927	4,667	2,341	4,058	835	24,441
	Denial Rate	57.3%	30.6%	21.6%	18.5%	15.6%	11.5%	22.6%	19.0%
Non-Hispanic Ethnicity	Loan Originated	339	9,711	22,225	18,353	11,361	27,712	2,473	92,174
	Application Denied	458	3,997	5,614	3,822	1,930	3,361	553	19,735
	Denial Rate	57.5%	29.2%	20.2%	17.2%	14.5%	10.8%	18.3%	17.6%
Hispanic (Ethnicity)	Loan Originated	49	718	855	513	256	554	76	3,021
	Application Denied	38	253	249	117	62	80	26	825
	Denial Rate	43.7%	26.1%	22.6%	18.6%	19.5%	12.6%	25.5%	21.5%

PREDATORY LENDING

Table 12.D.15
Originated Owner-Occupied Loans by HAL Status
 12. Cuyahoga County
 2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Other	17,134	15,771	13,442	10,830	8,361	7,967	7,235	6,115	86,855
HAL	2,948	5,993	5,368	1,884	889	451	42	12	17,587
Total	20,082	21,764	18,810	12,714	9,250	8,418	7,277	6,127	104,442
Percent HAL	14.7%	27.5%	28.5%	14.8%	9.6%	5.4%	.6%	.2%	16.8%

Table 12.D.16
Loans by Loan Purpose by HAL Status
 12. Cuyahoga County
 2004–2011 HMDA Data

Loan Purpose		2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	Other	17,134	15,771	13,442	10,830	8,361	7,967	7,235	6,115	86,855
	HAL	2,948	5,993	5,368	1,884	889	451	42	12	17,587
	Percent HAL	14.7%	27.5%	28.5%	14.8%	9.6%	5.4%	.6%	.2%	16.8%
Home Improvement	Other	2,884	3,009	3,231	2,994	2,060	1,103	951	1,077	17,309
	HAL	570	611	705	560	304	166	82	40	3,038
	Percent HAL	16.5%	16.9%	17.9%	15.8%	12.9%	13.1%	7.9%	3.6%	14.9%
Refinancing	Other	20,827	15,450	10,560	8,434	6,679	13,435	13,980	12,059	101,424
	HAL	4,350	6,482	5,344	2,519	969	545	79	63	20,351
	Percent HAL	17.3%	29.6%	33.6%	23.0%	12.7%	3.9%	.6%	.5%	16.7%
Total	Other	40,845	34,230	27,233	22,258	17,100	22,505	22,166	19,251	205,588
	HAL	7,868	13,086	11,417	4,963	889	451	42	12	40,976
	Percent HAL	16.2%	27.7%	29.5%	18.2%	11.2%	4.9%	.9%	.6%	16.6%

Table 12.D.17
HALs Originated by Race of Borrower
 12. Cuyahoga County
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	8	16	25	4	3	1	0	0	57
Asian	28	52	55	25	11	7	1	0	179
Black	1,210	2,534	2,576	872	267	112	9	3	7,583
White	1,244	2,527	2,175	823	557	310	30	7	7,673
Not Available	450	864	537	160	51	21	2	2	2,087
Not Applicable	8	0	0	0	0	0	0	0	8
Total	2,948	5,993	5,368	1,884	889	451	42	12	17,587
Hispanic (Ethnicity)	82	167	186	76	43	21	0	1	576

Table 12.D.18
Rate of HALs Originated by Race/Ethnicity of Borrower
 12. Cuyahoga County
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	11.0%	27.6%	49.0%	11.8%	10.3%	5.0%	.0%	.0%	19.8%
Asian	5.4%	8.7%	11.9%	6.4%	4.2%	2.5%	.4%	.0%	6.0%
Black	32.1%	56.4%	61.5%	37.1%	17.4%	9.7%	.9%	.4%	39.6%
White	8.7%	16.8%	17.0%	9.1%	8.2%	4.8%	.5%	.2%	10.3%
Not Available	34.6%	55.0%	41.1%	17.8%	8.0%	4.0%	.4%	.4%	28.5%
Not Applicable	14.8%	.0%	.0%	.0%	.0%	.0%	.0%	.0%	10%
Average	14.7%	27.5%	28.5%	14.8%	9.6%	5.4%	0.6%	0.2%	16.8%
Non-Hispanic Ethnicity	13.3%	24.8%	27.6%	14.5%	9.5%	5.3%	.6%	.2%	15.8%
Hispanic (Ethnicity)	14.6%	28.3%	33.1%	19.3%	17.7%	8.3%	.0%	.5%	19.1%

Table 12.D.19
Loans by HAL Status by Race/Ethnicity of Borrower
 12. Cuyahoga County
 2004–2011 HMDA Data

Race	Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Other	65	42	26	30	26	19	13	10	231
	HAL	8	16	25	4	3	1	0	0	57
	Percent HAL	11.0%	27.6%	49.0%	11.8%	10.3%	5.0%	.0%	.0%	19.8%
Asian	Other	495	549	408	367	253	272	249	215	2,808
	HAL	28	52	55	25	11	7	1	0	179
	Percent HAL	5.4%	8.7%	11.9%	6.4%	4.2%	2.5%	.4%	.0%	6.0%
Black	Other	2,565	1,956	1,611	1,478	1,270	1,048	953	706	11,587
	HAL	1,210	2,534	2,576	872	267	112	9	3	7,583
	Percent HAL	32.1%	56.4%	61.5%	37.1%	17.4%	9.7%	.9%	.4%	39.6%
White	Other	13,113	12,509	10,621	8,214	6,220	6,119	5,467	4,653	66,916
	HAL	1,244	2,527	2,175	823	557	310	30	7	7,673
	Percent HAL	8.7%	16.8%	17.0%	9.1%	8.2%	4.8%	0.5%	0.2%	10.3%
Not Available	Other	850	706	771	739	586	507	552	529	5,240
	HAL	450	864	537	160	51	21	2	2	2,087
	Percent HAL	34.6%	55.0%	41.1%	17.8%	8.0%	4.0%	.4%	.4%	28.5%
Not Applicable	Other	46	9	5	2	6	2	1	1	73
	HAL	8	0	0	0	0	0	0	0	8
	Percent HAL	14.8%	.0%	.0%	.0%	.0%	.0%	.0%	.0%	10.0%
Total	Other	17,134	15,771	13,442	10,830	8,361	7,967	7,235	6,115	86,855
	HAL	2,948	5,993	5,368	1,884	889	451	42	12	17,587
	Percent HAL	14.7%	27.5%	28.5%	14.8%	9.6%	5.4%	.6%	.2%	16.8%
Non-Hispanic Ethnicity	Other	14,260	14,535	12,294	9,779	7,576	7,243	6,503	5,425	77,615
	HAL	2,181	4,787	4,681	1,662	792	407	40	9	14,559
	Percent HAL	13.3%	24.8%	27.6%	14.5%	9.5%	5.3%	.6%	.2%	15.8%
Hispanic (Ethnicity)	Other	480	423	376	317	200	233	210	206	2,445
	HAL	82	167	186	76	43	21	0	1	576
	Percent HAL	14.6%	28.3%	33.1%	19.3%	17.7%	8.3%	.0%	.5%	19.1%

Table 12.D.20
Rates of HALs by Income of Borrower
 12. Cuyahoga County
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Average
\$15,000 or Below	8.5%	18.2%	18.5%	12.3%	25.6%	10.9%	.0%	4.0%	12.9%
\$15,001–\$30,000	23.2%	39.5%	37.9%	24.8%	16.3%	7.0%	1.0%	.7%	23.8%
\$30,001–\$45,000	19.7%	35.6%	37.6%	20.5%	13.3%	8.0%	.6%	.2%	22.8%
\$45,001–\$60,000	17.7%	33.1%	32.7%	16.6%	10.7%	5.4%	.6%	.2%	19.8%
\$60,001–\$75,000	12.3%	23.9%	28.2%	13.4%	8.1%	5.0%	.5%	.0%	15.5%
Above \$75,000	6.1%	13.9%	15.5%	7.1%	4.4%	2.4%	0.5%	.1%	8.1%
Data Missing	7.0%	21.2%	33.2%	21.3%	5.6%	2.1%	.0%	.0%	17.6%
Average	14.7%	27.5%	28.5%	14.8%	9.6%	5.4%	.6%	.2%	16.8%

Table 12.D.21
Loans by HAL Status by Income of Borrower
 12. Cuyahoga County
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Other	65	54	66	50	29	41	50	24	379
	HAL	6	12	15	7	10	5	0	1	56
	Percent HAL	8.5%	18.2%	18.5%	12.3%	25.6%	10.9%	.0%	4.0%	12.9%
\$15,001–\$30,000	Other	1,887	1,430	1,063	979	794	954	850	718	8,675
	HAL	569	932	649	323	155	72	9	5	2,714
	Percent HAL	23.2%	39.5%	37.9%	24.8%	16.3%	7.0%	1.0%	.7%	23.8%
\$30,001–\$45,000	Other	3,972	3,601	2,798	2,298	1,956	1,948	1,564	1,256	19,393
	HAL	975	1,987	1,686	593	301	169	9	2	5,722
	Percent HAL	19.7%	35.6%	37.6%	20.5%	13.3%	8.0%	.6%	.2%	22.8%
\$45,001–\$60,000	Other	3,334	2,882	2,537	2,024	1,671	1,650	1,349	1,091	16,538
	HAL	716	1,427	1,233	402	200	95	8	2	4,083
	Percent HAL	17.7%	33.1%	32.7%	16.6%	10.7%	5.4%	.6%	.2%	19.8%
\$60,001–\$75,000	Other	2,184	2,069	1,701	1,299	1,015	922	825	718	10,733
	HAL	306	651	669	201	90	49	4	0	1,970
	Percent HAL	12.3%	23.9%	28.2%	13.4%	8.1%	5.0%	.5%	.0%	15.5%
Above \$75,000	Other	4,884	5,167	4,812	3,988	2,811	2,358	2,527	2,233	28,780
	HAL	315	831	885	306	128	59	12	2	2,538
	Percent HAL	6.1%	13.9%	15.5%	7.1%	4.4%	2.4%	.5%	.1%	8.1%
Data Missing	Other	808	568	465	192	85	94	70	75	2,357
	HAL	61	153	231	52	5	2	0	0	504
	Percent HAL	7.0%	21.2%	33.2%	21.3%	5.6%	2.1%	.0%	.0%	17.6%
Total	Other	17,134	15,771	13,442	10,830	8,361	7,967	7,235	6,115	86,855
	HAL	2,948	5,993	5,368	1,884	889	451	42	12	17,587
	Percent HAL	14.7%	27.5%	28.5%	14.8%	9.6%	5.4%	.6%	.2%	16.8%

E. CRA DATA

Additional data tables related to Community Reinvestment Act (CRA) data are presented in this section.

Table 12.E.1
Small Business Loans Originated: \$100,000 or Less by Tract MFI
 12. Cuyahoga County
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	1,872	1,976	7,624	8,138	610	20,220
2001	2,152	2,344	8,866	8,465	788	22,615
2002	2,347	2,574	10,395	9,990	836	26,142
2003	2,313	4,590	9,339	11,063	350	27,655
2004	2,345	4,324	9,213	10,716	321	26,919
2005	2,208	4,401	9,804	11,502	251	28,166
2006	3,115	6,169	14,229	18,153	467	42,133
2007	3,322	6,687	15,297	20,125	406	45,837
2008	2,484	4,875	11,358	15,611	315	34,643
2009	1,034	2,206	4,821	7,055	150	15,266
2010	937	1,989	4,422	6,412	146	13,906
2011	1,264	2,393	5,502	7,722	209	17,090
Total	25,393	44,528	110,870	134,952	4,849	320,592
Loan Amount (\$1,000s)						
2000	27,256	25,620	90,584	95,254	10,114	248,828
2001	25,931	24,013	94,813	97,420	10,228	252,405
2002	28,798	29,354	112,947	119,874	13,522	304,495
2003	24,065	49,581	100,014	118,794	5,062	297,516
2004	25,137	49,321	96,081	120,260	4,392	295,191
2005	27,647	55,541	116,521	143,448	4,551	347,708
2006	29,400	63,934	144,795	188,239	4,909	431,277
2007	34,038	73,648	153,651	215,735	4,416	481,488
2008	26,023	51,044	119,119	169,687	4,378	370,251
2009	13,211	32,631	63,332	86,708	2,598	198,480
2010	14,761	33,167	65,013	91,760	2,913	207,614
2011	21,366	39,186	81,966	114,359	3,377	260,254
Total	297,633	527,040	1,238,836	1,561,538	70,460	3,695,507

Table 12.E.2
Small Business Loans Originated: \$100,001 to \$250,000 by Tract MFI
 12. Cuyahoga County
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	108	78	266	290	39	781
2001	109	107	345	369	57	987
2002	121	140	381	461	77	1,180
2003	96	174	285	373	25	953
2004	121	177	290	371	25	984
2005	122	172	277	382	15	968
2006	80	190	258	356	17	901
2007	91	164	248	311	11	825
2008	72	128	250	322	13	785
2009	37	123	180	241	13	594
2010	84	140	268	340	16	848
2011	85	140	263	360	14	862
Total	1,126	1,733	3,311	4,176	322	10,668
Loan Amount (\$1,000s)						
2000	18,528	14,351	46,594	50,500	7,254	137,227
2001	19,110	19,565	62,106	66,287	10,747	177,815
2002	22,067	26,752	69,754	80,473	14,919	213,965
2003	16,690	30,808	52,358	66,492	4,396	170,744
2004	21,558	32,338	53,320	66,439	4,699	178,354
2005	22,466	31,660	51,459	68,325	2,644	176,554
2006	14,595	34,365	47,058	63,741	3,115	162,874
2007	16,225	29,492	45,156	55,155	2,014	148,042
2008	13,689	23,156	43,949	57,287	2,396	140,477
2009	6,703	21,924	31,840	42,325	2,493	105,285
2010	15,760	25,264	50,144	60,698	2,612	154,478
2011	16,284	24,586	47,153	64,540	2,402	154,965
Total	203,675	314,261	600,891	742,262	59,691	1,920,780

Table 12.E.3
Small Business Loans Originated: More than \$250,000 by Tract MFI
 12. Cuyahoga County
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	94	64	297	294	61	810
2001	114	88	375	380	60	1,017
2002	134	118	434	502	84	1,272
2003	80	203	341	419	29	1,072
2004	119	228	363	446	38	1,194
2005	126	199	356	482	26	1,189
2006	126	195	313	455	24	1,113
2007	85	180	292	397	13	967
2008	77	175	245	375	16	888
2009	73	127	226	322	12	760
2010	109	217	328	444	23	1,121
2011	84	178	303	386	19	970
Total	1,221	1,972	3,873	4,902	405	12,373
Loan Amount (\$1,000s)						
2000	49,465	33,237	155,491	157,005	31,722	426,920
2001	60,988	48,700	198,913	211,487	33,209	553,297
2002	72,450	66,404	242,067	274,066	46,998	701,985
2003	44,917	114,530	182,153	234,588	13,661	589,849
2004	59,890	130,019	197,683	244,904	20,656	653,152
2005	70,600	112,922	196,432	275,322	15,049	670,325
2006	69,956	112,111	177,307	259,024	14,692	633,090
2007	47,128	96,838	156,326	231,774	7,488	539,554
2008	41,536	98,805	130,506	214,577	9,194	494,618
2009	40,844	72,363	117,209	178,462	7,416	416,294
2010	61,385	125,476	189,998	247,042	12,348	636,249
2011	49,616	102,459	158,433	200,604	11,100	522,212
Total	668,775	1,113,864	2,102,518	2,728,855	223,533	6,837,545

Table 12.E.4
Small Business Loans to Businesses with Gross Annual Revenues of Less Than \$1 Million by Tract MFI
 12. Cuyahoga County
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	722	762	2,931	3,163	233	7,811
2001	921	1,035	3,850	3,746	382	9,934
2002	662	688	2,664	3,068	301	7,383
2003	722	1,432	3,115	3,883	88	9,240
2004	735	1,408	3,017	3,750	89	8,999
2005	935	1,924	4,598	5,573	82	13,112
2006	1,021	2,203	5,448	6,448	104	15,224
2007	1,121	2,408	5,757	6,928	90	16,304
2008	676	1,458	3,628	4,323	61	10,146
2009	304	770	1,817	2,306	28	5,225
2010	313	772	1,690	2,122	33	4,930
2011	548	1,057	2,583	3,465	64	7,717
Total	8,680	15,917	41,098	48,775	1,555	116,025
Loan Amount (\$1,000s)						
2000	33,292	27,687	117,745	134,277	18,256	331,257
2001	33,566	36,626	130,898	162,202	15,795	379,087
2002	51,378	51,205	162,954	208,995	25,914	500,446
2003	25,185	70,539	135,083	171,653	6,487	408,947
2004	34,064	69,830	118,993	150,104	6,131	379,122
2005	35,288	66,757	137,316	177,239	3,631	420,231
2006	25,683	65,481	142,927	188,072	3,648	425,811
2007	29,630	55,944	126,495	167,729	2,962	382,760
2008	20,568	40,237	89,668	122,936	3,856	277,265
2009	6,682	27,231	58,657	81,254	761	174,585
2010	13,274	35,395	72,544	100,403	3,206	224,822
2011	18,547	35,569	72,690	106,280	2,000	235,086
Total	327,157	582,501	1,365,970	1,771,144	92,647	4,139,419

F. COMPLAINT DATA

This section contains data regarding fair housing complaints, as provided by the U.S. Department of Housing and Urban Development (HUD), the Ohio Civil Rights Commission (OCRC), the Fair Housing Contact Service (FHCS), the Housing Resource and Advocacy Center, and the Fair Housing Resource Center (FHRC).⁵⁹

HUD COMPLAINTS

Table 12.F.1
Fair Housing Complaints by Basis
12. Cuyahoga County
2004–2012 HUD Data

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

⁵⁹ The FHCS is based in Akron and the FHRC is based in Painesville; however, some complainants from within Cuyahoga County used these services over the period for which data are available.

Table 12.F.2
Fair Housing Complaints by Issue
 12. Cuyahoga County
 2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Discriminatory refusal to sell	1		2	2	1	1	1			8
Discrimination in the terms or conditions for making loans	1		1	1		2	3			8
Non-compliance with design and construction requirements (handicap)	1		1		1	3	1	1		8
False denial or representation of availability			2		5					7
Discrimination in terms, conditions, privileges relating to sale	2		1		1	1	2			7
Failure to permit reasonable modification	1	1	1		3		1			7
Discriminatory acts under Section 818 (coercion, etc.)	6	12	10	6	3	5	8	9	6	65
Using ordinances to discriminate in zoning and land use	1	1	1		3					6
Steering			1		1	2	1			5
Discriminatory refusal to rent and negotiate for rental	2	7	11	2	3	7	7	1	1	41
Refusing to provide insurance	2			2						4
Discriminatory refusal to sell and negotiate for sale	1					1	1			3
Discriminatory advertising - sale					1	2				3
Other discriminatory acts	5	4		4	3		2	5	4	27
Discrimination in the selling of residential real property					1		1			2
Discrimination in services and facilities relating to sale						1	1			2
Redlining - insurance	1				1					2
Redlining - mortgage			2							2
Failure to provide accessible and usable public and common user areas	1		1							2
Failure to provide usable doors	1								1	2
Otherwise deny or make housing available			1	1		4	8	5		19
Discrimination in terms, conditions or privileges relating to rental	11	26	25	17	19	30	34	13	7	182
Discriminatory refusal to rent	22	29	15	25	28	15	21	8	11	174
Discrimination in services and facilities relating to rental			1	3	2	3	4	3		16
False denial or representation of availability - rental			3		6	4	1	1		15
Discriminatory financing (includes real estate transactions)	2		4	5	2	1			1	15
Discriminatory advertisement - rental		1	3		14	63	7	26	23	137
Discriminatory terms, conditions, privileges, or services and facilities	3	7	12	12	25	14	20	18	12	123
Discrimination in making of loans		1		3	2	1	3	1		11
Failure to make reasonable accommodation	11	13	16	10	13	7	16	15	8	109
Discriminatory advertising, statements, and notices	3	4	5	4	14	6	36	24	9	105
Discriminatory refusal to negotiate for rental			1	1	2	5	1			10
Blockbusting - rental						1				1
Discrimination in the brokering of residential real property				1						1
Restriction of choices relative to a rental						1				1
Total Issues	78	106	120	99	154	180	180	130	83	1,130
Total Complaints	59	81	83	77	130	152	135	95	61	873

Table 12.F.3
Fair Housing Complaints by Closure Status
 12. Cuyahoga County
 2004–2012 HUD Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Administrative Closure	6	18	8	9	18	19	23	6	1	108
Cause (FHAP)	2	8	8	6	17	62	29	24	6	162
Charged (HUD)						1				1
Conciliated / Settled	25	30	36	17	42	40	59	24	13	286
DOJ Closure	1				3					4
No Cause	25	25	31	45	50	29	24	21		250
Open						1		20	41	62
Total Complaints	59	81	83	77	130	152	135	95	61	873

HUD Complaints Found With Cause

Table 12.F.4
Fair Housing Complaints Found With Cause by Basis
 12. Cuyahoga County
 2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color	1			1						2
Disability	14	18	18	9	16	9	18	8	4	114
Family Status	4	6	12	8	13	61	33	35	14	186
National Origin			5	1	16	7	10	4		43
Race	11	11	14	10	30	22	20	3	1	122
Religion	1	1	1		3			2		8
Sex	2	1		2	2	11	14	2	2	36
Total Bases	33	37	50	31	80	110	95	54	21	511
Total Complaints	28	38	44	23	62	103	88	48	19	453

Table 12.F.5
Fair Housing Complaints Found With Cause by Issue
 12. Cuyahoga County
 2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Discriminatory refusal to rent	11	16	6	9	16	13	13	5	1	90
False denial or representation of availability - rental			2		3	3	1			9
Discrimination in terms, conditions or privileges relating to rental	5	9	10	7	8	15	18	6	2	80
Other discriminatory acts	1			2	2		1	1	1	8
Discrimination in making of loans		1		2	1		3			7
Discriminatory advertising, statements, and notices	2	3	3	3	6	4	26	18	1	66
Failure to make reasonable accommodation	8	10	9	6	8	6	11	6	2	66
False denial or representation of availability			2		4					6
Discrimination in services and facilities relating to rental			1			2	3			6
Using ordinances to discriminate in zoning and land use	1		1		3					5
Non-compliance with design and construction requirements (handicap)	1		1		1		1	1		5
Discriminatory terms, conditions, privileges, or services and facilities		3	4	1	11	7	8	5	2	41
Discriminatory refusal to negotiate for rental			1			3				4
Failure to permit reasonable modification	1	1	1		1					4
Discriminatory financing (includes real estate transactions)	1		1			1				3
Discrimination in the terms or conditions for making loans				1		1	1			3
Discriminatory acts under Section 818 (coercion, etc.)	4	4	6	2	2	3	3	4		28
Discriminatory refusal to rent and negotiate for rental	1	3	5	1	2	2	6	1		21
Discriminatory refusal to sell			1				1			2
Discrimination in terms, conditions, privileges relating to sale	1						1			2
Steering						1	1			2
Discriminatory advertisement - rental			3		11	58	7	14	12	105
Otherwise deny or make housing available			1			1	5	3		10
Discriminatory advertising - sale						1				1
Blockbusting - rental						1				1
Discrimination in services and facilities relating to sale							1			1
Refusing to provide insurance	1									1
Restriction of choices relative to a rental						1				1
Failure to provide accessible and usable public and common user areas			1							1
Total Issues	38	50	59	34	79	123	111	64	21	579
Total Complaints	28	38	44	23	62	103	88	48	19	453

OHIO CIVIL RIGHTS COMMISSION COMPLAINTS

Table 12.F.6
Fair Housing Complaints by Basis
 12. Cuyahoga County
 2004–2012 OCRRC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color	1	5		1	1	2		1		11
Disability	26	32	79	26	30	18	29	24	5	269
Family Status	5	9	11	12	23	16	18	18	5	117
Gender	4	7	12	16	10	10	22	7	5	93
National Origin	2	6	5	8	28	2	14	3		68
Race	34	39	30	40	31	34	34	20	6	285
Religion	1	4	2	5			2	3		17
Retaliation	5	18	11	15	12	7	11	10	5	94
Other				2	1	1		1		5
Total Bases	78	120	150	125	156	87	130	87	26	959
Total Complaints	64	88	127	86	113	74	109	64	18	743

Table 12.F.7
Fair Housing Complaints by Issue
 12. Cuyahoga County
 2004–2012 OCRRC Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Advertising	3	2	2		2	10	10	12	4	45
Discharge				2						2
Exclusion	19	32	6	16	35	8	10			126
Harassment	5	12	4	15	13	11	6	2	3	71
Intimidation	4	8	1	3	4	1	2	1	4	28
Maternity				1						1
Other	20	26	48	36	35	27	56	23	2	273
Reasonable Accommodation	13	14	50	8	12	5	11	11	3	127
Recall			1							1
Sexual Harassment	1	1	1	3	4	2	1	1	3	17
Terms and Conditions	15	30	24	21	40	21	27	23	4	205
Testing				1						1
Total Issues	80	125	137	106	145	85	123	73	23	897
Total Complaints	64	88	127	86	113	74	109	64	18	743

Table 12.F.8
Fair Housing Complaints by Closure Status
 12. Cuyahoga County
 2004–2012 OCRRC Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Administrative Closure	3	1		3	1	2	5	1	4	20
CP Failed to Cooperate		3	2	3	2	5	8	2		25
CP Refused Full Relief			32							32
CP Withdrawal – No Benefit	7	15	4	6	6	5	19	5		67
Failure to Locate Charging Party	1		1		1					3
Inquiry Closed		1								1
No Cause Finding Issued	27	27	35	56	46	21	24	27	3	266
No Jurisdiction		2	3	2	2	3	1			13
Open Charge Closed By Legal Activity			4		1					5
Settlement With Benefits	7	8	18	8	24	26	26	16	5	138
Successful Conciliation	1	2	3	2	9	3	6	1		27
Withdrawal With Benefits	18	29	25	6	21	9	20	12	6	146
Total Complaints	64	88	127	86	113	74	109	64	18	743

FAIR HOUSING CONTACT SERVICE COMPLAINTS

Table 12.F.9
Fair Housing Complaints by Basis
12. Cuyahoga County
2004–2012 FHCS Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Ancestry	1									1
Color	1			1						2
Criminal Background							1			1
Disability	1									1
Race	1			1						2
Sex			1	1						2
Other							1			1
Total Bases	4	0	1	3	0	0	2	0	0	10
Total Complaints	1		1	1			1			4

Table 12.F.10
Fair Housing Complaints by Closure Status
12. Cuyahoga County
2004–2012 FHCS Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Inquiry			1							1
No probable cause				1						1
Referred for other assistance							1			1
Missing	1									1
Total Complaints	1	0	1	1	0	0	1	0	0	4

FAIR HOUSING RESOURCE CENTER COMPLAINTS

Table 12.F.11
Fair Housing Complaints by Basis
12. Cuyahoga County
2004– 2012 FHRC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability	1	4	2	1		1	1			10
Race	1									1
Sex	1									1
Other				1				2		3
Total Bases	3	4	2	2	0	1	1	2	0	15
Total Complaints	3	4	2	2		1	1	2		15

Table 12.F.12
Fair Housing Complaints by Issue Type
12. Cuyahoga County
2004– 2012 FHRC Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Rental	3	4	2	2		1	1	2		15
Total	3	4	2	2	0	1	1	2	0	15

Table 12.F.13
Fair Housing Complaints by Closure Status
 12. Cuyahoga County
 2004–2012 FHRC Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Settled through counseling	3	4	1	2		1	1	2		14
Referred to OCRC			1							1
Total	3	4	2	2	0	1	1	2	0	15

THE HOUSING RESEARCH AND ADVOCACY CENTER

Table 12.F.14
Fair Housing Complaints by Basis
 12 Cuyahoga County
 2004–2012 HRAC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability	2		9	14	18	21	55	39	51	209
Race	2	10	13	12	21	13	24	13	25	133
Familial Status	1	2	5	5	5	8	14	8	4	52
Color				1					25	26
Gender			2	1		4	1	8	10	26
Sex			1		1	3	12	4	2	23
National Origin	1		1	4	2		2	2	8	20
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
Sexual Harassment						1				1
Total Bases	6	12	36	39	53	53	117	81	151	548
Total Complaints	6	12	24	36	48	47	102	73	97	445

Table 12.F.15
Fair Housing Complaints by Issue
 12 Cuyahoga County
 2004–2012 HRAC Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Rental	6	10	21	28	44	46	92	71	85	403
Sale		2	2	7	2		1	2	2	18
Other			1	1	1	1	4		8	16
Shelter							5			5
Mortgage					1				2	3
Total	6	12	24	36	48	47	102	73	97	445
Total Complaints	6	12	24	36	48	47	102	73	97	445

Table 12.F.16
Fair Housing Complaints by Action Taken
 12 Cuyahoga County
 2004–2012 HRAC Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Referred to OCRC	4	11	11	20	30	11	40	21	43	191
Fair Housing Info Given			8	7	9	22	24	27	55	152
Reasonable Accommodation	1		1	3	4	6	12	14	12	53
HRAC Conducted Test		7	6	6	13	3	1	4	1	41
Referred to Attorney	2			6	3	1	9	7		28
Referred to City			3			2	9	1	5	20
Agency complaint with OCRC		1	1	1				2	1	6
Referred to ACLU				1						1
Total	7	19	30	44	59	45	95	76	117	492
Total Complaints	6	12	24	36	48	47	102	73	97	445

G. FAIR HOUSING SURVEY FOR HOUSING STAKEHOLDERS DATA

This section presents public involvement data gathered through the 2012–2013 Fair Housing Survey for Housing Stakeholders.

Table 12.G.1
Primary Role of Respondent
 12. Cuyahoga County
 2012–2013 Fair Housing Survey for Housing
 Stakeholders Data

Primary Role	Total
Advocate/Service Provider	15
Banking/Finance	2
Condo or Homeowner Association Leader	2
Construction/Development	4
Insurance	1
Local Government	8
Property Management	2
Real Estate	3
Resident Advisory Council Leader	1
Other Role	12
Total	50

FEDERAL, STATE, AND LOCAL LAWS

Table 12.G.2
Familiarity with Fair Housing Laws
 12. Cuyahoga County
 2012–2013 Fair Housing Survey for Housing
 Stakeholders Data

Familiarity	Total
Not Familiar	3
Somewhat Familiar	17
Very Familiar	14
Missing	16
Total	50

Table 12.G.3
Perceptions About Fair Housing Laws

12. Cuyahoga County
 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?	31	2	1	16	50
Are fair housing laws difficult to understand or follow?	6	19	8	17	50
Do you think fair housing laws should be changed?	9	13	10	18	50
Do you thing fair housing laws are adequately enforced?	21	9	1	19	50

Table 12.G.4
Fair Housing Activities

12. Cuyahoga County
 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?		21	9	1	19	50
Have you participated in fair housing training?		18	4		28	50
Are you aware of any fair housing testing?		12	13	6	19	50
Testing and education	Too Little	Right Amount	Too Much	Don't Know	Missing	Total
Is there sufficient outreach and education activity?	14	6	1	8	21	50
Is there sufficient testing?	8	4		19	19	50

Table 12.G.5
Protected Classes

12. Cuyahoga County
 2012–2013 Fair Housing Survey
 for Housing Stakeholders Data

Protected Class	Total
Family Status	20
Religion	16
Gender	14
National Origin	14
Color	9
Sexual Orientation	12
Age	8
Military	6
Disability	1
Ancestry	5
Ethnicity	4
Race	1
Other	16
Total	126

Table 12.G.6
Fair Housing Violation Referrals
 12. Cuyahoga County
 2012–2013 Fair Housing Survey for Housing
 Stakeholders Data

Referral	Total
HUD	8
Cleveland Tenants Organization	6
OCRC	6
Cleveland Fair Housing Board	4
City	3
Don't Know	2
Heights Community Congress	2
Housing Advocates, Inc.	2
Housing Research and Advocacy Center	2
Legal Aid	2
Other	2
ACLU	1
Total	41

LOCAL FAIR HOUSING

Table 12.G.7
Local Fair Housing
 12. Cuyahoga County
 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?	16	9	3	22	50
Are there any specific geographic areas that have fair housing problems?	4	11	13	22	50
Are there any specific groups in that face housing discrimination?	6	8	12	24	50

FAIR HOUSING IN THE PRIVATE SECTOR

Table 12.G.8
Barriers to Fair Housing in the Private Sector
 12. Cuyahoga County
 2012–2013 Fair Housing Survey for Housing Stakeholders Data

Question	Yes	No	Don't Know	Missing	Total
Are you aware of any questionable practices or barriers to fair housing choice in:					
The rental housing market?	6	17	5	22	50
The real estate industry?	7	14	7	22	50
The mortgage and home lending industry?	9	10	10	21	50
The housing construction or accessible housing design fields?	7	11	11	21	50
The home insurance industry?	6	8	15	21	50
The home appraisal industry?	8	8	12	22	50
Any other housing services?	3	10	15	22	50

FAIR HOUSING IN THE PUBLIC SECTOR

Table 12.G.9
Barriers to Fair Housing in the Public Sector
 12. Cuyahoga County
 2012–2013 Fair Housing Survey for Housing Stakeholders Data

Question	Yes	No	Don't Know	Missing	Total
Are you aware of any questionable practices or barriers to fair housing choice in:					

Land use policies?	3	19	6	22	50
Zoning laws?	5	12	10	23	50
Occupancy standards or health and safety codes?	5	15	8	22	50
Property tax policies?	1	16	11	22	50
Permitting process?	2	14	11	23	50
Housing construction standards?	2	17	8	23	50
Neighborhood or community development policies?	5	16	7	22	50
Limited access to government services, such as employment services?	7	17	3	23	50
Public administrative actions or regulations?	3	14	11	22	50

NARRATIVE COMMENTS

Federal, State, and Local Laws

Table 12.G.10
How did you become aware of fair housing laws?

12. Cuyahoga County
2013 Fair Housing Survey Data

Comments:
<p>25 years of working in the non-profit field of affordable housing As a landlord and community development professional Attending workshops Because of my professional work experience in areas of community development and public housing. Being educated as a fair housing board member By living in communities that stressed pro-integration policies. Conferences, Meetings, Studying them...etc... experience I have worked in the Fair Housing non-profit field since 2000. I hold a real estate license in Ohio and it is a requirement of licensing. Internet HUD NFCC It be the job for which I do. Research and seminars. The PHA does periodic trainings for staff, and I also regularly attend housing conferences and workshops. Through participating on various community related development efforts that dealt with housing regulations. Training sessions and workshops are attended by staff. We review HUD notifications. Training through the City of Lakewood We're a fair housing agency. Worked as a CSR for Banks- Loan officer and now in the City Fair Housing Board Working closely and sharing contracts with The Housing Research and Advocacy Center Working with city government</p>

Table 12.G.11
How should fair housing laws be changed?

12. Cuyahoga County
2013 Fair Housing Survey Data

Comments:
<p>Add ban the box...Discrimination based on Felony/arrest records. Additional protected classes, particularly Sexual Orientation should be added All People with Children don't need to be in a shelter for no longer than 2 days because this is to traumatic for all involved be it a fire abuse etc.. Too many empty homes that need to be occupied and adequately repaired. First time done job that last a lifetime no work done shabby to get more money in the near future. On going program to assist elderly in any repairs of older structured property. Fair housing laws need to be more inclusive off vulnerable populations not just based on ethnicity and disability. seniors, renters, low income, populations, and students should all be protected classes in my opinion. Sexual Orientation should be added. should add sexual preference or identity They should be strengthened for enforcement purposes and to include additional protected classes. To afford greater protection to wider groups and harsher penalties for violators. to included formerly incarcerated persons as a protected class</p>

Local Fair Housing**Table 12.G.12****Are there any specific geographic areas that have fair housing problems?**

12. Cuyahoga County
2013 Fair Housing Survey Data

Comments:
<p>All areas in the County have Fair Housing issues. Personally seen them in Cleveland, North Olmsted, Lakewood, Westlake, Rocky River, Olmsted Falls, South Euclid, Cleveland Hts., Solon, Mayfield Hts., Strongsville, Middleburg Hts., Shaker Hts, Cuyahga Hts. (race, national origin, religion, family status, disability)</p> <p>All geographic areas. Housing discrimination occurs everywhere.</p> <p>Little Italy, various other enclaves in the city, specifically ethnic ones</p> <p>There is a perception of Fair housing issues in key growth areas of our city.</p>

Table 12.G.13**Are there any specific groups in that face housing discrimination?**

12. Cuyahoga County
2013 Fair Housing Survey Data

Comments:
<p>All members of protected classes and individuals who have been incarcerated, pay their rent with sources of income other than employment, among others.</p> <p>Formerly incarcerated persons often face discrimination when attempting secure housing</p> <p>Muslims/Arabs, Latinos (all), African Americans, families with children, people with disabilities</p> <p>Possibly-Those with felony records</p> <p>Racial and ethnic minorities</p> <p>Racial minorities in particular seem most prevalent</p>

Table 12.G.14**Please share any additional comments.**

12. Cuyahoga County
2013 Fair Housing Survey Data

Comments:
<p>All of the potential violations of the federal, state, and local fair housing laws occur in our area. Housing discrimination and segregated communities are a growing problem that effect not only where one lives but in many respects ones life chances through access to quality schools, transportation, employment, and a healthy environment. The health and sustainability of the community as a whole suffers without housing choice and integration. I would be happy to talk with you about any of these issues in more detail.</p> <p>Given the fast number of persons returning to their community after a period of incarceration I would strongly advocate for making such persons a protected class to end housing discrimination against them.</p> <p>It is an important issue.</p>

Fair Housing in the Private Sector

Table 12.G.15

Are you aware of any questionable practices or barriers to fair housing choice in the rental housing market?

12. Cuyahoga County
2013 Fair Housing Survey Data

Comments:
<p>I think it is arbitrary that rental properties under 3 units is exempt from Fair Housing practices</p> <p>Landlords who don't want to rent to families with children and try to advertise "no children" which is illegal.</p> <p>Refusal to rent, differences in price/fees, denial of reasonable modifications & accommodations,</p> <p>Segregation resulting from housing discrimination against all protected classes Lack of accessible housing for people with disabilities Discrimination against families with children based on incorrect occupancy We would be happy to discuss these issues in more detail.</p> <p>Specific neighborhoods - less welcoming to minorities, like Little Italy...Gentrifying neighborhoods like Tremont with little affordable housing</p> <p>There are landlords who prefer not to rent to people with what they consider to be too many children. I have also heard of families who have trouble renting housing in certain areas because of reluctance to accept Housing Choice Vouchers. This can make it difficult for families to have adequate housing options.</p>

Table 12.G.16

Are you aware of any questionable practices or barriers to fair housing choice in the real estate industry?

12. Cuyahoga County
2013 Fair Housing Survey Data

Comments:
<p>I know someone who sued their realtor because they were not being permitted to view all available housing within a community. The realtor was showing African American families homes in specific sections of the city.</p> <p>see above</p> <p>Steering Blockbusting Lack of knowledge about fair housing laws Lack of supervision and training of real estate agents by brokerage firms</p> <p>Steering, differences in level of service</p> <p>tend to be biased against Cleveland neighborhoods</p> <p>The amount of segregation must point to some racial steering.</p>

Table 12.G.17

Are you aware of any questionable practices or barriers to fair housing choice in the mortgage and home lending industry?

12. Cuyahoga County
2013 Fair Housing Survey Data

Comments:
<p>A lot of the foreclosures on homes in the area were filed against minorities, many women who were victims of lending scams</p> <p>Differences in level of service, rates, loan products, application requirements</p> <p>It is my belief that people of different races are treated substantially differently by the lending community. Minorities are denied access to credit or charged higher interest rates.</p> <p>Loan products that were developed such as the interest only product and the ARM loan product created a scenario that adversely impacted racial minorities more than other ethnic groups. These loan products were used more consistently in urban areas to finance homes and rental properties.</p> <p>Mortgages are offered in only certain areas and Private mortgage insurance is disproportionately apply to minorities</p> <p>People of color are denied and receive high-cost loans more often.</p> <p>Redlining Different terms and conditions Inaccessible information about lending practices</p> <p>Women and racial minorities have higher interest rate and are denied loan modifications at at higher rate than Whites.</p>

Table 12.G.18**Are you aware of any questionable practices or barriers to fair housing choice in the housing construction or accessible housing design fields?**

12. Cuyahoga County
2013 Fair Housing Survey Data

Comments:
<p>Inaccessible housing Lack of knowledge or ignoring building code and fair housing law requirements Differences in treatment based on location/neighborhood of property. More Universal Design is needed. Recently, K&D got in a major suit over building inaccessible housing and bribing building officials When buildings are accessible it is often side,hard to get to entrance.</p>

Table 12.G.19**Are you aware of any questionable practices or barriers to fair housing choice in the home insurance industry?**

12. Cuyahoga County
2013 Fair Housing Survey Data

Comments:
<p>In the insurance industry many companies fail to ensure homes in communities with an older housing stock and they refuse in some respects to insure rental property due to age of the housing and the type of features that exist in the homes. Most of the homes in urbanized areas are occupied by minorities and renters which are protected classes. by virtue of looking at housing age and rental factors you are by default making it difficult to obtain or maintain insurance for certain groups. Even if the basis for insurance companies decision are not racially motivated. the factors in which insurance companies make decisions on who to ensure and at what rate will impact certain groups more than others. Limiting policies and coverages to racial minorities often difficult to get insurance coverage in low income areas Redlining Different terms and conditions Inaccessible information about practices Differences in treatment based on location/neighborhood of property.</p>

Table 12.G.20**Are you aware of any questionable practices or barriers to fair housing choice in the home appraisal industry?**

12. Cuyahoga County
2013 Fair Housing Survey Data

Comments:
<p>Basing home values on the racial & ethnic composition of neighborhoods. I think the appraisal industry is fully out of whack and contributing to the slow housing market. They have over-corrected and hampering sales and legitimate increase in values which hurts everyone In the past Black neighborhoods had houses appraised to high and now with the decline they have declined in value at a greater percentage than similar 'white' neighborhoods its a known fact that lower income minority communities housing stock appraises lower than non-minority communities. The reason for this one can assume is not primarily condition of the housing stock. when racial composition changes in neighborhoods so does the housing values in those communities. many homes in minority areas were valued below there actual value Redlining Different terms and conditions Inaccessible information about practices Differences in treatment based on location/neighborhood of property. The changing real estate market has affected rental comparables and property values.</p>

Table 12.G.21**Are you aware of any questionable practices or barriers to fair housing choice in any other housing services?**12. Cuyahoga County
2013 Fair Housing Survey Data

Comments:
Differences in treatment of individuals and maintenance of property based on location/neighborhood of property. In Ward 1 in Garfield minority interest seeking to purchase a home in the Garfield community are steered to the Ward 1 area of the City. Many of those minorities who desire to live in that community because of the school system end up in Ward 1 because that area of Garfield falls under the CMSD jurisdiction. By steering minorities to this area those families with school aged children don't get the benefit of going to Garfield schools, rather they must attend John Adams which is a CMSD institution.

Fair Housing in the Public Sector**Table 12.G.22****Are you aware of any questionable practices or barriers to fair housing choice in land use policies?**12. Cuyahoga County
2013 Fair Housing Survey Data

Comments:
Concentration of multi-family housing in segregated areas. more and more we are seeing the desire to create compact mixed use communities that offer convenience by promoting walkability and creates sustainable developments. However many of the developments that are created concentrate people of similar incomes and social status. We are moving toward a mixed income scenario with some developments however it is not as much as we need Policies that concentrate multi-family housing in limited areas

Table 12.G.23**Are you aware of any questionable practices or barriers to fair housing choice in zoning laws?**12. Cuyahoga County
2013 Fair Housing Survey Data

Comments:
Group homes and other such uses are restricted and need to be heard before the Board of Zoning Appeals Laws that restrict placement of group homes Prohibition of group homes. Restrictive definitions of families.

Table 12.G.24**Are you aware of any questionable practices or barriers to fair housing choice in occupancy standards or health and safety codes?**12. Cuyahoga County
2013 Fair Housing Survey Data

Comments:
Certain suburbs are more active in monitoring and forcing the correction of health and safety codes than others. There is often more attention paid to higher income subsections of the community. Inadequate code enforcement in communities of color and immigrant communities. Restrictions on definition of family, overly restrictive occupancy There are health and safety code violations that are not adequately enforced in low income minority communities due to the impact of the housing crisis (foreclosed/substandard housing) in many of these areas. The volume of housing issues outweighs our ability to police.

Table 12.G.25**Are you aware of any questionable practices or barriers to fair housing choice in property tax policies?**12. Cuyahoga County
2013 Fair Housing Survey Data

Comments:

Disinvestment and foreclosures resulting from lending discrimination result in diminished property values in minority neighborhoods.

Table 12.G.26

Are you aware of any questionable practices or barriers to fair housing choice in the permitting process?

12. Cuyahoga County
2013 Fair Housing Survey Data

Comments:
Permits denied based on protected class or segregated neighborhood. Permit requirements not followed in segregated neighborhoods. we do not currently offer permitting process information in alternative languages via the internet or otherwise.

Table 12.G.27

Are you aware of any questionable practices or barriers to fair housing choice in housing construction standards?

12. Cuyahoga County
2013 Fair Housing Survey Data

Comments:
Although accessibility requirements are in the Ohio Building Codes, the local building inspectors have no training on those standards, and approve plans that are not accessible Lack of enforcement. Building officials don't have to certify that residences are accessible prior to construction or occupancy permitting.

Table 12.G.28

Are you aware of any questionable practices or barriers to fair housing choice in neighborhood or community development policies?

12. Cuyahoga County
2013 Fair Housing Survey Data

Comments:
Community development efforts are too strongly focused on the areas of greatest need. More effort should be made to strengthen areas with some market confidence so that they can remain solid and grow. Gentrifying neighborhoods focused on eliminating affordable housing, thus a disparate impact on people of color investments in "trendy" neighborhoods result in displacement of current residents policies that encourage development in narrowly defined areas of the community Policies that encourage economic development without considering the impact on existing residential communities when developments occur in racially or ethnically segregated communities.

Table 12.G.29

Are you aware of any barriers that limit access to government services, such as a lack of transportation or employment services?

12. Cuyahoga County
2013 Fair Housing Survey Data

Comments:
for many with low-incomes transportation to various government services can present a problem if the service is located out of their area. lack of transportation or employment services Public transit is limit, difficult, and hard to navigate. The ticketing machines are next to impossible. Very hard to use. Disparate impact on the poor and people of color. RTA eliminated the circulator and reduced routes in community Transportation Transportation system is biased to the automobile. Transportation, especially for people with disabilities.

Table 12.G.30

Are you aware of any questionable practices or barriers to fair housing choice in any other public administrative actions or regulations?

12. Cuyahoga County
2013 Fair Housing Survey Data

Comments:
Certain cities make it more difficult for landlords to rent out he houses. For example, they may impose high Certificate of Occupancy

fees in order to make it less attractive.
Sustainable construction requirements and LEED residential developments are targeted for high end properties and developments instead of lower income residential projects.
There are too many to detail within the scope of this survey.

H. LAND USE PLANNING SURVEY DATA

This section contains data regarding the potential effects of local land use and housing policies on fair housing choice, as gathered from the Fair Housing Survey for Government Officials.

FAIR HOUSING SURVEY FOR GOVERNMENT OFFICIALS

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 was conducted predominately online. Respondents were solicited by mass-distributed emails sent by the NEOSCC, members of the Progress Review Team, and other various organizations in the 12-county region.

This section contains data gathered from the public sector staff in the Cuyahoga County that received and completed the survey.⁶⁰

⁶⁰ For areas with both nonentitlement and entitlement communities, the results of the nonentitlement community government official survey and the entitlement community interviews were summed.

Table 12.H.1
Housing Development
 12. Cuyahoga County
 2012 Fair Housing Survey for Government Officials Data

Question: Does your jurisdiction have...	Yes	No	Don't Know	Missing	Total
Housing Development					
Definitions for "dwelling unit" or "residential unit"?	13		2	13	28
Guidelines that encourage development affordable housing units?	7	6	2	13	28
Any potential barriers to the development of low- to moderate- income housing?	1	8	6	13	28
Guidelines that allow the development of mixed use housing?	8	4	3	13	28
Any potential barriers to the development of mixed use housing?	6	2	7	13	28
Occupancy Standards					
A definition for the term "family"?	12		3	13	28
Residential occupancy standards or limits?	6	1	7	14	28
Special Needs Housing					
A definition for the term "disability"?	4	8	2	14	28
Development standards for making housing accessible to persons with disabilities?	4	7	3	14	28
A process by which persons with disabilities can request modification to the jurisdiction's policies?	5	6	3	14	28
Standards for the development of senior housing?	5	6	3	14	28
Guidelines that distinguish senior citizen housing from other residential uses?	8	2	4	14	28
Guidelines for developing housing for any other special needs populations?	8	3	3	14	28
Fair Housing Policies					
A fair housing ordinance, policy, or regulation?	10	1	3	14	28
Policies or practices for "affirmatively furthering fair housing"?	10	2	2	14	28

I. IMPEDIMENTS

The 2013 Northeast Ohio Regional Analysis of Impediments to Fair Housing Choice uncovered several potential issues regarding fair housing in the Cuyahoga County. Identification of these items as probable impediments to fair housing choice was based on HUD's definition of impediments as actions, omissions, or decisions that restrict housing choice due to protected class status or actions, omissions, or decisions that have this effect. The identified impediments are supported by evidence uncovered during the Regional AI process, with impediments of higher need being those identified in multiple sources.

These probable impediments in the entirety of the Northeast Ohio Region are presented in **Volumes I and II** of the Regional AI. They are accompanied by suggested actions that jurisdictions in the Region may implement in order to alleviate or eliminate these impediments, and are accompanied by measurable objectives. The goal of these actions and measurable objectives is to assist these agencies in offering greater housing choice for all citizens of the Northeast Ohio Region.

The following list presents the private and public sector impediments found in the Cuyahoga County.

PRIVATE SECTOR

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

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

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

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

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

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

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

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

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

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

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

Suggestion: Additional training for landlords and property managers.

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

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

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

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

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

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

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

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

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

8. *Impediment: Denial of home purchase loans*

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

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

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

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

Suggestion: Utilize resources for first-time and lower-income homebuyers that belong to race, ethnic, and gender protected classes so that they can improve their credit 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.

IMPEDIMENTS MATRIX

The matrix on the following page includes the impediment, data source, or sources that indicated its existence, protected classes most affected, and ranking of need for action. Level of need for action was determined based on the number of data sources that identified each impediment.

Table 12.I.1
Impediments Matrix
 12. Cuyahoga County
 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 ⁶¹			
Private Sector													
1	Denial of available housing units in the rental markets		X				X	X				Black and Hispanic persons	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				All	L
2	Lack of sufficient fair housing outreach and education efforts							X	X	X		All	M
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		Disabled persons, families	L
6	Lack of inclusionary policies							X		X		All	H

⁶¹ 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.

13. CITY OF CLEVELAND

A. CENSUS BUREAU DATA

This section contains additional data from the U.S. Census Bureau.

Table 13.A.1

Population by Age

13. City of Cleveland

2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Under 5	38,594	8.1%	28,095	7.1%	-27.2%
5 to 19	111,002	23.2%	82,840	20.9%	-25.4%
20 to 24	32,061	6.7%	30,407	7.7%	-5.2%
25 to 34	71,847	15.0%	53,996	13.6%	-24.8%
35 to 54	128,933	27.0%	109,281	27.5%	-15.2%
55 to 64	35,987	7.5%	44,700	11.3%	24.2%
65 or Older	59,979	12.5%	47,496	12.0%	-20.8%
Total	478,403	100.0%	396,815	100.0%	-17.1%

Table 13.A.2

Elderly Population by Age

13. City of Cleveland

2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
65 to 66	6,556	10.9%	5,648	11.9%	-13.8%
67 to 69	9,551	15.9%	7,982	16.8%	-16.4%
70 to 74	15,466	25.8%	10,917	23.0%	-29.4%
75 to 79	12,838	21.4%	9,142	19.2%	-28.8%
80 to 84	8,428	14.1%	7,122	15.0%	-15.5%
85 or Older	7,140	11.9%	6,685	14.1%	-6.4%
Total	59,979	100.0%	47,496	100.0%	-20.8%

Table 13.A.3

Population by Race and Ethnicity

13. City of Cleveland

2000 & 2010 Census SF1 Data

Race	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
White	198,510	41.5%	147,929	37.3%	-25.5%
Black	243,939	51.0%	211,672	53.3%	-13.2%
American Indian	1,458	.3%	1,340	.3%	-8.1%
Asian	6,444	1.3%	7,327	1.8%	13.7%
Native Hawaiian/ Pacific Islander	178	.0%	120	.0%	-32.6%
Other	17,173	3.6%	17,502	4.4%	1.9%
Two or More Races	10,701	2.2%	10,925	2.8%	2.1%
Total	478,403	100.0%	396,815	100.0%	-17.1%
Non-Hispanic	443,675	92.7	357,281	90.0%	-19.5%
Hispanic	34,728	7.3%	39,534	10.0%	13.8%

Table 13.A.4
Disability by Age
 13. City of Cleveland
 2010 Three-Year ACS Data

Age	Male		Female		Total	
	Disabled Population	Disability Rate	Disabled Population	Disability Rate	Disabled Population	Disability Rate
Under 5	80	.6%	167	1.2%	247	.9%
5 to 17	4,567	13.2%	3,137	8.6%	7,704	10.9%
18 to 34	4,417	9.9%	5,045	10.2%	9,462	10.1%
35 to 64	17,685	23.8%	19,890	24.5%	37,575	24.2%
65 to 74	3,906	36.8%	5,165	37.8%	9,071	37.4%
75 or Older	4,649	53.9%	8,693	58.7%	13,342	56.9%
Total	35,304	19.0%	42,097	20.1%	77,401	19.6%

Table 13.A.5
Employment Status by Disability and Type: Age 18 to 64
 13. City of Cleveland
 2010 Three-Year ACS Data

Disability Status	Population
Employed:	145,305
With a disability:	13,076
With a hearing difficulty	2,695
With a vision difficulty	2,291
With a cognitive difficulty	4,828
With an ambulatory difficulty	5,782
With a self-care difficulty	1,627
With an independent living difficulty	3,394
No disability	132,229
Unemployed:	34,121
With a disability:	6,116
With a hearing difficulty	909
With a vision difficulty	1,092
With a cognitive difficulty	3,164
With an ambulatory difficulty	2,333
With a self-care difficulty	511
With an independent living difficulty	1,457
No disability	28,005
Not in labor force:	69,878
With a disability:	27,845
With a hearing difficulty	3,605
With a vision difficulty	4,883
With a cognitive difficulty	14,145
With an ambulatory difficulty	18,153
With a self-care difficulty	6,291
With an independent living difficulty	13,679
No disability	42,033
Total	249,304

Table 13.A.6**Households by Income**

13. City of Cleveland

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	58,564	30.7%	50,543	29.7%
\$15,000 to \$19,999	16,954	8.9%	15,242	8.9%
\$20,000 to \$24,999	16,771	8.8%	13,048	7.7%
\$25,000 to \$34,999	28,228	14.8%	22,532	13.2%
\$35,000 to \$49,999	28,814	15.1%	25,192	14.8%
\$50,000 to \$74,999	25,592	13.4%	24,183	14.2%
\$75,000 to \$99,999	9,328	4.9%	10,707	6.3%
\$100,000 or More	6,474	3.4%	9,017	5.3%
Total	190,725	100.0%	170,464	100.0%

Table 13.A.7**Poverty by Age**

13. City of Cleveland

2000 Census SF3 & 2010 Five-Year ACS Data

Age	2000 Census		2010 Five-Year ACS	
	Persons in Poverty	% of Total	Persons in Poverty	% of Total
Under 6	18,562	15.2%	16,546	13.3%
6 to 17	32,067	26.2%	29,966	24.1%
18 to 64	62,245	50.8%	67,762	54.5%
65 or Older	9,605	7.8%	9,974	8.0%
Total	122,479	100.0%	124,248	100.0%
Poverty Rate	26.3%	.	31.2%	.

Table 13.A.8**Households by Year Home Built**

13. City of Cleveland

2000 Census SF3 & 2010 Five-Year ACS Data

Year Built	2000 Census		2010 Five-Year ACS	
	Households	% of Total	Households	% of Total
1939 or Earlier	92,837	48.7%	88,762	52.1%
1940 to 1949	32,112	16.8%	21,773	12.8%
1950 to 1959	29,611	15.5%	24,231	14.2%
1960 to 1969	17,029	8.9%	13,024	7.6%
1970 to 1979	10,160	5.3%	9,282	5.4%
1980 to 1989	3,975	2.1%	3,589	2.1%
1990 to 1999	4,909	2.6%	4,544	2.7%
2000 to 2004	.	.	3,648	2.1%
2005 or Later	.	.	1,611	.9%
Total	190,633	100.0%	170,464	100.0%

Table 13.A.9
Housing Units by Type

13. City of Cleveland
2000 Census SF3 & 2010 Five-Year ACS Data

Unit Type	2000 Census		2010 Five-Year ACS	
	Units	% of Total	Units	% of Total
Single-Family	113,958	52.8%	114,910	53.1%
Duplex	42,351	19.6%	44,721	20.7%
Tri- or Four-Plex	16,541	7.7%	14,260	6.6%
Apartment	41,877	19.4%	41,179	19.0%
Mobile Home	1,082	.5%	1,417	.7%
Boat, RV, Van, Etc.	35	.0%	74	.0%
Total	215,844	100.0%	216,561	100.0%

Table 13.A.10
Housing Units by Tenure

13. City of Cleveland
2000 & 2010 Census SF1 Data

Tenure	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
Occupied Housing Units	190,638	88.3%	167,490	80.7%	-12.1%
Owner-Occupied	92,535	48.5%	73,911	44.1%	-20.1%
Renter-Occupied	98,103	51.5%	93,579	55.9%	-4.6%
Vacant Housing Units	25,218	11.7%	40,046	19.3%	58.8%
Total Housing Units	215,856	100.0%	207,536	100.0%	-3.9%

Table 13.A.11
Disposition of Vacant Housing Units

13. City of Cleveland
2000 & 2010 Census SF1 Data

Disposition	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
For Rent	11,929	47.3%	16,688	41.7%	39.9%
For Sale	2,028	8.0%	3,033	7.6%	49.6%
Rented or Sold, Not Occupied	2,206	8.7%	1,660	4.1%	-24.8%
For Seasonal, Recreational, or Occasional Use	763	3.0%	444	1.1%	-41.8%
For Migrant Workers	4	0.0%	3	.0%	-25.0%
Other Vacant	8,288	32.9%	18,218	45.5%	119.8%
Total	25,218	100.0%	40,046	100.0%	58.8%

Table 13.A.12
Households by Household Size

13. City of Cleveland
2000 & 2010 Census SF1 Data

Size	2000 Census		2010 Census		% Change 00-10
	Households	% of Total	Households	% of Total	
One Person	67,177	35.2%	66,150	39.5%	-1.5%
Two Persons	51,656	27.1%	45,716	27.3%	-11.5%
Three Persons	29,987	15.7%	24,354	14.5%	-18.8%
Four Persons	21,126	11.1%	16,148	9.6%	-23.6%
Five Persons	11,655	6.1%	8,481	5.1%	-27.2%
Six Persons	5,150	2.7%	3,655	2.2%	-29.0%
Seven Persons or More	3,887	2.0%	2,986	1.8%	-23.2%
Total	190,638	100.0%	167,490	100.0%	-12.1%

Table 13.A.13
Household Type by Tenure
 13. City of Cleveland
 2000 & 2010 Census SF1 Data

Household Type	2000 Census		2010 Census		% Change 00–10
	Households	% of Total	Households	% of Total	
Family Households	111,998	58.7%	89,821	53.6%	-19.8%
Married-Couple Family	54,244	48.4%	37,486	41.7%	-30.9%
Owner-Occupied	38,583	71.1%	26,200	69.9%	-32.1%
Renter-Occupied	15,661	28.9%	11,286	30.1%	-27.9%
Other Family	57,754	51.6%	52,335	58.3%	-9.4%
Male Householder, No Spouse	10,459	18.1%	10,004	19.1%	-4.4%
Owner-Occupied	5,384	51.5%	4,582	45.8%	-14.9%
Renter-Occupied	5,075	48.5%	5,422	54.2%	6.8%
Female Householder, No Spouse	47,295	81.9%	42,331	80.9%	-10.5%
Owner-Occupied	17,510	37.0%	14,245	33.7%	-18.6%
Renter-Occupied	29,785	63.0%	28,086	66.3%	-5.7%
Non-Family Households	78,640	41.3%	77,669	46.4%	-1.2%
Owner-Occupied	31,058	39.5%	28,884	37.2%	-7.0%
Renter-Occupied	47,582	60.5%	48,785	62.8%	2.5%
Total	190,638	100.0%	167,490	100.0%	-12.1%

Table 13.A.14
Group Quarters Population
 13. City of Cleveland
 2000 & 2010 Census SF1 Data

2000 & 2010 Census Staff Data					
Group Quarters Type	2000 Census		2010 Census		% Change 00-10
	Population	% of Total	Population	% of Total	
Institutionalized					
Correctional Institutions	2,750	39.5%	2,695	43.1%	-2.0%
Juvenile Facilities	.	.	481	7.7%	.
Nursing Homes	3,670	52.7%	3,062	48.9%	-16.6%
Other Institutions	542	7.8%	20	.3%	-96.3%
Total	6,962	100.0%	6,258	100.0%	-10.1%
Noninstitutionalized					
College Dormitories	2,772	42.8%	3,579	47.8%	29.1%
Military Quarters	5	.1%	0	.0%	-100.0%
Other Noninstitutional	3,695	57.1%	3,905	52.2%	5.7%
Total	6,472	48.2%	7,484	54.5%	15.6%
Total Group Quarters Population	13,434	100.0%	13,742	100.0%	2.3%

Table 13.A.15
Overcrowding and Severe Overcrowding
 13. City of Cleveland
 2000 Census SF3 & 2010 Five-Year ACS Data

Data Source	No Overcrowding		Overcrowding		Severe Overcrowding		Total
	Households	% of Total	Households	% of Total	Households	% of Total	
Owner							
2000 Census	90,615	98.0%	1,431	1.5%	452	.5%	92,498
2010 ACS	79,593	99.1%	587	.7%	158	.2%	80,338
Renter							
2000 Census	94,159	95.9%	2,787	2.8%	1,189	1.2%	98,135
2010 ACS	88,397	98.1%	1,168	1.3%	561	.6%	90,126
Total							
2000 Census	184,774	96.9%	4,218	2.2%	1,641	.9%	190,633
2010 ACS	167,990	98.5%	1,755	1.0%	719	.4%	170,464

Table 13.A.16
Households with Incomplete Plumbing Facilities
 13. City of Cleveland
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Plumbing Facilities	189,124	169,224
Lacking Complete Plumbing Facilities	1,509	1,240
Total Households	190,633	170,464
Percent Lacking	.8%	.7%

Table 13.A.17
Households with Incomplete Kitchen Facilities
 13. City of Cleveland
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Kitchen Facilities	188,691	168,058
Lacking Complete Kitchen Facilities	1,942	2,406
Total Households	190,633	170,464
Percent Lacking	1.0%	1.4%

Table 13.A.18
Cost Burden and Severe Cost Burden by Tenure
 13. City of Cleveland
 2000 Census & 2010 Five-Year ACS Data

Data Source	Less Than 30%		31%-50%		Above 50%		Not Computed		Total
	Households	% of Total	Households	% of Total	Households	% of Total	Households	% of Total	
Owner With a Mortgage									
2000 Census	33,508	65.4%	9,663	18.9%	7,486	14.6%	546	1.1%	51,203
2010 ACS	30,173	54.7%	13,434	24.3%	11,248	20.4%	346	.6%	55,201
Owner Without a Mortgage									
2000 Census	19,862	82.5%	1,978	8.2%	1,546	6.4%	696	2.9%	24,082
2010 ACS	19,127	76.1%	3,573	14.2%	2,059	8.2%	378	1.5%	25,137
Renter									
2000 Census	49,864	51.0%	17,766	18.2%	22,041	22.5%	8,154	8.3%	97,825
2010 ACS	35,929	39.9%	19,153	21.3%	27,135	30.1%	7,909	8.8%	90,126
Total									
2000 Census	103,234	59.6%	29,407	17.0%	31,073	17.9%	9,396	5.4%	173,110
2010 ACS	85,229	50.0%	36,160	21.2%	40,442	23.7%	8,633	5.1%	170,464

Table 13.A.19
Median Housing Costs
 13. City of Cleveland
 2000 Census SF3 & 2010 Five-Year ACS Data

Housing Cost	2000 Census	2010 ACS
Median Contract Rent	\$379	\$485
Median Home Value	\$72,100	\$86,700

B. BLS DATA

This section contains Bureau of Labor Statistics (BLS) data that address employment and income.

Table 13.B.1
Labor Force Statistics
 13. City of Cleveland
 1990–2011 BLS Data

Year	Labor Force	Employment	Unemployment	Unemployment Rate	Statewide Unemployment Rate
1990	207,219	185,081	22,138	10.7%	5.7%
1991	205,030	179,393	25,637	12.5%	6.6%
1992	209,714	179,186	30,528	14.6%	7.4%
1993	211,286	181,885	29,401	13.9%	6.7%
1994	211,835	184,922	26,913	12.7%	5.6%
1995	208,868	187,513	21,355	10.2%	4.9%
1996	208,163	188,813	19,350	9.3%	5.0%
1997	210,111	191,347	18,764	8.9%	4.6%
1998	210,634	193,181	17,453	8.3%	4.3%
1999	212,231	194,499	17,732	8.4%	4.3%
2000	203,656	188,568	15,088	7.4%	4.0%
2001	203,556	187,003	16,553	8.1%	4.4%
2002	204,007	183,286	20,721	10.2%	5.7%
2003	195,795	179,878	15,917	8.1%	6.2%
2004	192,647	176,878	15,769	8.2%	6.1%
2005	189,466	174,683	14,783	7.8%	5.9%
2006	186,885	173,217	13,668	7.3%	5.4%
2007	187,327	172,316	15,011	8.0%	5.6%
2008	186,246	169,868	16,378	8.8%	6.5%
2009	182,260	162,466	19,794	10.9%	10.1%
2010	168,152	148,845	19,307	11.5%	10.0%
2011	168,158	150,814	17,344	10.3%	8.6%

C. HMDA DATA

The Home Mortgage Disclosure Act (HMDA) requires both depository and non-depository lenders to collect and publicly disclose information about housing-related loans and loan applications.⁶² The information presented in this section presents detailed HMDA data, including denial rates and predatory lending including high annual percentage rate (APR) loans.

Table 13.C.1
Purpose of Loan by Year
13. City of Cleveland
2004–2011 HMDA Data

Purpose	2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	12,540	16,055	15,220	8,605	4,333	3,122	2,445	2,040	64,360
Home Improvement	4,046	4,010	4,192	3,980	3,231	2,009	1,492	1,589	24,549
Refinancing	25,234	23,813	16,244	11,534	7,005	4,822	3,801	3,470	95,923
Total	41,820	43,878	35,656	24,119	14,569	9,953	7,738	7,099	184,832

Table 13.C.2
Occupancy Status for Home Purchase Loan Applications
13. City of Cleveland
2004–2011 HMDA Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	Total
Owner-Occupied	8,976	10,945	9,932	6,159	3,679	2,905	2,285	1,886	46,767
Not Owner-Occupied	3,472	5,015	5,235	2,400	640	211	152	145	17,270
Not Applicable	92	95	53	46	14	6	8	9	323
Total	12,540	16,055	15,220	8,605	4,333	3,122	2,445	2,040	64,360

Table 13.C.3
Owner-Occupied Home Purchase Loan Applications by Loan Type
13. City of Cleveland
2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Conventional	7,337	9,581	8,797	5,071	1,491	885	586	506	34,254
FHA - Insured	1,486	1,233	1,039	1,036	2,080	1,938	1,610	1,306	11,728
VA - Guaranteed	153	131	96	52	107	82	89	74	784
Rural Housing Service or Farm Service Agency	0	0	0	0	1	0	0	0	1
Total	8,976	10,945	9,932	6,159	3,679	2,905	2,285	1,886	46,767

⁶² Data are considered “raw” because they contain entry errors and incomplete loan applications. Starting in 2004, the HMDA data made substantive changes in reporting. It modified the way it handled Hispanic data, loan interest rates, and the reporting of multifamily loan applications.

DENIAL RATES

Table 13.C.4
Loan Applications by Action Taken
 13. City of Cleveland
 2004–2011 HMDA Data

Action	2004	2005	2006	2007	2008	2009	2010	2011	Total
Loan Originated	4,355	4,891	3,793	2,498	1,625	1,227	1,003	770	20,162
Application Approved but not Accepted	993	737	623	384	140	89	56	58	3,080
Application Denied	1,240	2,201	2,490	1,500	606	326	258	234	8,855
Application Withdrawn by Applicant	747	1,125	1,025	365	193	156	112	92	3,815
File Closed for Incompleteness	135	152	143	147	81	33	39	29	759
Loan Purchased by the Institution	1,506	1,809	1,844	1,248	1,027	1,073	817	703	10,027
Preapproval Request Denied	0	30	14	17	7	1	0	0	69
Preapproval Approved but not Accepted	0	0	0	0	0	0	0	0	0
Total	8,976	10,945	9,932	6,159	3,679	2,905	2,285	1,886	46,767
Denial Rate	22.2%	31.0%	39.6%	37.5%	27.2%	21.0%	20.5%	23.3%	30.5%

Table 13.C.5
Denial Rates by Gender of Applicant
 13. City of Cleveland
 2004–2011 HMDA Data

Year	Male	Female	Not Available	Not Applicable	Average
2004	20.5%	21.4%	54.6%	%	22.2%
2005	28.8%	31.8%	50.2%	.0%	31.0%
2006	38.3%	39.9%	50.0%	%	39.6%
2007	34.6%	39.5%	51.1%	100.0%	37.5%
2008	26.9%	26.6%	37.2%	50.0%	27.2%
2009	20.1%	20.3%	33.3%	.0%	21.0%
2010	20.3%	18.5%	32.0%	%	20.5%
2011	21.4%	23.8%	32.9%	%	23.3%
Average	28.8%	30.8%	46.7%	37.5%	30.5%

Table 13.C.6
Loan Applications by Selected Action Taken by Gender of Applicant
 13. City of Cleveland
 2004–2011 HMDA Data

Gender		2004	2005	2006	2007	2008	2009	2010	2011	Total
Male	Originated	2,316	2,654	1,940	1,366	852	603	519	397	10,647
	Denied	599	1,076	1,204	724	313	152	132	108	4,308
	Denial Rate	20.5%	28.8%	38.3%	34.6%	26.9%	20.1%	20.3%	21.4%	28.8%
Female	Originated	1,945	2,080	1,683	1,044	718	559	418	320	8,767
	Denied	528	970	1,116	682	260	142	95	100	3,893
	Denial Rate	21.4%	31.8%	39.9%	39.5%	26.6%	20.3%	18.5%	23.8%	30.8%
Not Available	Originated	94	154	170	88	54	64	66	53	743
	Denied	113	155	170	92	32	32	31	26	651
	Denial Rate	54.6%	50.2%	50.0%	51.1%	37.2%	33.3%	32.0%	32.9%	46.7%
Not Applicable	Originated	0	3	0	0	1	1	0	0	5
	Denied	0	0	0	2	1	0	0	0	3
	Denial Rate	%	.0%	%	100.0%	50.0%	.0%	%	%	37.5%
Total	Originated	4,355	4,891	3,793	2,498	1,625	1,227	1,003	770	20,162
	Denied	1,240	2,201	2,490	1,500	606	326	258	234	8,855
	Denial Rate	22.2%	31.0%	39.6%	37.5%	27.2%	21.0%	20.5%	23.3%	30.5%

Table 13.C.7
Denial Rates by Race/Ethnicity of Applicant
 13. City of Cleveland
 2004–2011 HMDA Data

Race/Ethnicity	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	29.4%	40.0%	35.0%	40.0%	21.1%	.0%	50.0%	33.3%	31.9%
Asian	12.3%	20.4%	34.7%	20.8%	26.2%	25.0%	8.0%	36.8%	22.3%
Black	26.4%	37.3%	49.5%	49.8%	37.7%	29.8%	25.0%	30.5%	39.8%
White	15.2%	21.8%	24.6%	23.0%	18.6%	14.7%	15.9%	18.1%	19.9%
Not Available	38.5%	46.8%	51.4%	48.2%	34.4%	31.3%	35.9%	33.3%	43.7%
Not Applicable	12.5%	.0%	%	100.0%	.0%	0.0%	0%	.0%	16.1%
Average	22.2%	31.0%	39.6%	37.5%	27.2%	21.0%	20.5%	23.3%	30.5%
Non-Hispanic	19.8%	29.3%	38.3%	36.4%	26.7%	19.9%	17.3%	22.3%	29.2%
Hispanic	19.1%	26.0%	31.4%	30.8%	23.6%	20.3%	26.4%	20.2%	25.7%

Table 13.C.8
Loan Applications by Selected Action Taken by Race/Ethnicity of Applicant
 13. City of Cleveland
 2004–2011 HMDA Data

Race		2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Originated	36	18	13	3	15	3	2	4	94
	Denied	15	12	7	2	4	0	2	2	44
	Denial Rate	29.4%	40.0%	35.0%	40.0%	21.1%	50.0%	50.0%	33.3%	31.9%
Asian	Originated	93	90	62	42	31	27	23	12	380
	Denied	13	23	33	11	11	9	2	7	109
	Denial Rate	12.3%	20.4%	34.7%	20.8%	26.2%	25.0%	8.0%	36.8%	22.3%
Black	Originated	1,499	1,872	1,535	905	532	328	219	171	7,061
	Denied	538	1,113	1,504	899	322	139	73	75	4,663
	Denial Rate	26.4%	37.3%	49.5%	49.8%	37.7%	29.8%	25.0%	30.5%	39.8%
White	Originated	2,292	2,508	1,861	1,351	943	767	659	506	10,887
	Denied	412	700	606	403	215	132	125	112	2,705
	Denial Rate	15.2%	21.8%	24.6%	23.0%	18.6%	14.7%	15.9%	18.1%	19.9%
Not Available	Originated	414	401	322	197	103	101	100	76	1,714
	Denied	259	353	340	183	54	46	56	38	1,329
	Denial Rate	38.5%	46.8%	51.4%	48.2%	34.4%	31.3%	35.9%	33.3%	43.7%
Not Applicable	Originated	21	2	0	0	1	1	0	1	26
	Denied	3	0	0	2	0	0	0	0	5
	Denial Rate	38.5%	46.8%	51.4%	48.2%	34.4%	31.3%	35.9%	33.3%	16.1%
Total	Originated	4,355	4,891	3,793	2,498	1,625	1,227	1,003	770	20,162
	Denied	1,240	2,201	2,490	1,500	606	326	258	234	8,855
	Denial Rate	22.2%	31.0%	39.6%	37.5%	27.2%	21.0%	20.5%	23.3%	30.5%
Non-Hispanic	Originated	3,272	4,094	3,229	2,113	1,407	1,025	836	619	16,595
	Denied	809	1,700	2,006	1,207	512	255	175	178	6,842
	Denial Rate	19.8%	29.3%	38.3%	36.4%	26.7%	19.9%	17.3%	22.3%	29.2%
Hispanic	Originated	313	347	277	213	120	106	81	83	1,540
	Denied	74	122	127	95	37	27	29	21	532
	Denial Rate	19.1%	26.0%	31.4%	30.8%	23.6%	20.3%	26.4%	20.2%	25.7%

Table 13.C.9
Loan Applications by Reason for Denial
 13. City of Cleveland
 2004–2011 HMDA Data

Denial Reason	2004	2005	2006	2007	2008	2009	2010	2011	Total
Debt-to-Income Ratio	161	200	228	220	97	78	53	48	1,085
Employment History	7	15	16	21	12	11	10	6	98
Credit History	276	329	467	379	148	81	78	65	1,823
Collateral	122	177	202	182	107	71	52	51	964
Insufficient Cash	14	30	45	26	14	8	6	4	147
Unverifiable Information	19	42	88	81	25	5	8	14	282
Credit Application Incomplete	86	163	100	127	45	18	16	21	576
Mortgage Insurance Denied	0	0	1	0	4	2	3	0	10
Other	231	656	468	223	65	29	20	12	1,704
Missing	324	589	875	241	89	23	12	13	2,166
Total	1,240	2,201	2,490	1,500	606	326	258	234	8,855

Table 13.C.10
Denial Rates by Income of Applicant
 13. City of Cleveland
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	60.3%	74.0%	60.3%	56.6%	53.7%	53.3%	40.0%	53.1%	58.3%
\$15,001–\$30,000	24.0%	36.0%	46.2%	45.2%	32.5%	24.0%	23.4%	26.7%	35.0%
\$30,001–\$45,000	21.5%	27.5%	40.0%	38.5%	25.3%	17.6%	20.3%	22.2%	29.6%
\$45,001–\$60,000	19.0%	30.7%	36.8%	34.5%	24.0%	19.6%	13.1%	19.2%	28.2%
\$60,001–\$75,000	16.4%	28.9%	36.6%	29.9%	27.4%	14.4%	20.5%	21.2%	26.5%
Above \$75,000	19.4%	22.9%	28.1%	19.9%	17.6%	17.1%	15.3%	13.9%	21.4%
Data Missing	36.8%	43.3%	38.4%	46.4%	52.4%	43.8%	44.4%	57.9%	41.6%
Total	22.2%	31.0%	39.6%	37.5%	27.2%	21.0%	20.5%	23.3%	30.5%

Table 13.C.11
Denial Rates of Loans by Race/Ethnicity and Income of Applicant
 13. City of Cleveland
 2004–2011 HMDA Data

Race	<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	Above \$75K	Data Missing	Average
American Indian	33.3%	39.3%	29.7%	20.8%	14.3%	16.7%	60.0%	31.9%
Asian	60.0%	26.4%	16.7%	14.5%	27.9%	23.4%	40.0%	22.3%
Black	67.0%	40.9%	37.3%	40.0%	38.0%	39.8%	51.9%	39.8%
White	49.8%	24.9%	19.7%	17.5%	16.0%	13.5%	25.2%	19.9%
Not Available	64.9%	47.1%	41.7%	39.7%	47.4%	31.6%	66.2%	43.7%
Not Applicable	%	10.0%	14.3%	.0%	33.3%	.0%	100.0%	16.1%
Average	58.3%	35.0%	29.6%	28.2%	26.5%	21.4%	41.6%	30.5%
Non-Hispanic Ethnicity	59.5%	34.7%	28.5%	26.9%	24.3%	19.8%	35.2%	29.2%
Hispanic (Ethnicity)	40.5%	25.7%	25.0%	20.7%	28.7%	25.0%	35.2%	25.7%

Table 13.C.12
Loan Applications by Reason for Denial by Race/Ethnicity of Applicant

13. City of Cleveland
 2004–2011 HMDA Data

Denial Reason	American Indian	Asian	Black	White	Not Available	Not Applicable	Total	Hispanic (Ethnicity)
Debt-to-Income Ratio	7	13	604	340	121	0	1,085	84
Employment History	0	3	42	44	9	0	98	8
Credit History	15	20	985	582	220	1	1,823	131
Collateral	6	21	440	399	96	2	964	62
Insufficient Cash	0	1	71	55	20	0	147	10
Unverifiable Information	1	6	162	82	31	0	282	18
Credit Application Incomplete	1	6	280	219	70	0	576	35
Mortgage Insurance Denied	0	0	5	3	2	0	10	1
Other	9	19	911	499	265	1	1,704	98
Missing	5	20	1,163	482	495	1	2,166	85
Total	44	109	4,663	2,705	1,329	5	8,855	532
% Missing	11.4%	18.3%	24.9%	17.8%	37.2%	20.0%	24.5%	16.0%

Table 13.C.13
Loan Applications by Income of Applicant: Originated and Denied

13. City of Cleveland
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Loan Originated	29	27	29	33	25	28	36	15	222
	Application Denied	44	77	44	43	29	32	24	17	310
	Denial Rate	60.3%	74.0%	60.3%	56.6%	53.7%	53.3%	40.0%	53.1%	58.3%
\$15,001–\$30,000	Loan Originated	1,205	1,145	821	593	397	313	265	203	4,942
	Application Denied	381	643	704	490	191	99	81	74	2,663
	Denial Rate	24.0%	36.0%	46.2%	45.2%	32.5%	24.0%	23.4%	26.7%	35.0%
\$30,001–\$45,000	Loan Originated	1,461	1,821	1,322	847	516	425	287	214	6,893
	Application Denied	399	689	883	531	175	91	73	61	2,902
	Denial Rate	21.5%	27.5%	40.0%	38.5%	25.3%	17.6%	20.3%	22.2%	29.6%
\$45,001–\$60,000	Loan Originated	800	901	787	464	352	213	199	139	3,855
	Application Denied	188	399	459	244	111	52	30	33	1,516
	Denial Rate	19.0%	30.7%	36.8%	34.5%	24.0%	19.6%	13.1%	19.2%	28.2%
\$60,001–\$75,000	Loan Originated	361	362	286	192	119	113	62	67	1,562
	Application Denied	71	147	165	82	45	19	16	18	563
	Denial Rate	16.4%	28.9%	36.6%	29.9%	27.4%	14.4%	20.5%	21.2%	26.5%
Above \$75,000	Loan Originated	391	512	458	339	206	126	144	124	2,300
	Application Denied	94	152	179	84	44	26	26	20	625
	Denial Rate	19.4%	22.9%	28.1%	19.9%	17.6%	17.1%	15.3%	13.9%	21.4%
Data Missing	Loan Originated	108	123	90	30	10	9	10	8	388
	Application Denied	63	94	56	26	11	7	8	11	276
	Denial Rate	36.8%	43.3%	38.4%	46.4%	52.4%	43.8%	44.4%	57.9%	41.6%
Total	Loan Originated	4,355	4,891	3,793	2,498	1,625	1,227	1,003	770	20,162
	Application Denied	1,240	2,201	2,490	1,500	606	326	258	234	8,855
	Denial Rate	22.2%	31.0%	39.6%	37.5%	27.2%	21.0%	20.5%	23.3%	30.5%

Table 13.C.14
Loan Applications by Income and Race/Ethnicity of Applicant: Originated and Denied
 13. City of Cleveland
 2004–2011 HMDA Data

Race		<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	> \$75K	Data Missing	Total
American Indian	Loan Originated	2	34	26	19	6	5	2	94
	Application Denied	1	22	11	5	1	1	3	44
	Denial Rate	33.3%	39.3%	29.7%	20.8%	14.3%	16.7%	60.0%	31.9%
Asian	Loan Originated	4	95	120	65	31	59	6	380
	Application Denied	6	34	24	11	12	18	4	109
	Denial Rate	60.0%	26.4%	16.7%	14.5%	27.9%	23.4%	40.0%	22.3%
Black	Loan Originated	64	2,185	2,712	1,228	430	364	78	7,061
	Application Denied	130	1,514	1,612	819	263	241	84	4,663
	Denial Rate	67.0%	40.9%	37.3%	40.0%	38.0%	39.8%	51.9%	39.8%
White	Loan Originated	126	2,215	3,465	2,218	983	1,628	252	10,887
	Application Denied	125	733	851	469	187	255	85	2,705
	Denial Rate	49.8%	24.9%	19.7%	17.5%	16.0%	13.5%	25.2%	19.9%
Not Available	Loan Originated	26	404	564	322	110	238	50	1,714
	Application Denied	48	359	403	212	99	110	98	1,329
	Denial Rate	64.9%	47.1%	41.7%	39.7%	47.4%	31.6%	66.2%	43.7%
Not Applicable	Loan Originated	0	9	6	3	2	6	0	26
	Application Denied	0	1	1	0	1	0	2	5
	Denial Rate	%	10.0%	14.3%	.0%	33.3%	.0%	100.0%	16.1%
Total	Loan Originated	222	4,942	6,893	3,855	1,562	2,300	388	20,162
	Application Denied	310	2,663	2,902	1,516	563	625	276	8,855
	Denial Rate	58.3%	35.0%	29.6%	28.2%	26.5%	21.4%	41.6%	30.5%
Non-Hispanic Ethnicity	Loan Originated	160	3,883	5,732	3,234	1,332	1,957	297	16,595
	Application Denied	235	2,059	2,289	1,188	427	483	161	6,842
	Denial Rate	59.5%	34.7%	28.5%	26.9%	24.3%	19.8%	35.2%	29.2%
Hispanic (Ethnicity)	Loan Originated	44	588	502	218	72	81	35	1,540
	Application Denied	30	203	167	57	29	27	19	532
	Denial Rate	40.5%	25.7%	25.0%	20.7%	28.7%	25.0%	35.2%	25.7%

PREDATORY LENDING

Table 13.C.15
Originated Owner-Occupied Loans by HAL Status
 13. City of Cleveland
 2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Other	3,210	2,803	2,098	1,803	1,338	1,126	996	765	14,139
HAL	1,145	2,088	1,695	695	287	101	7	5	6,023
Total	4,355	4,891	3,793	2,498	1,625	1,227	1,003	770	20,162
Percent HAL	26.3%	42.7%	44.7%	27.8%	17.7%	8.2%	.7%	.6%	29.9%

Table 13.C.16
Loans by Loan Purpose by HAL Status
 13. City of Cleveland
 2004–2011 HMDA Data

Loan Purpose		2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	Other	3,210	2,803	2,098	1,803	1,338	1,126	996	765	14,139
	HAL	1,145	2,088	1,695	695	287	101	7	5	6,023
	Percent HAL	26.3%	42.7%	44.7%	27.8%	17.7%	8.2%	.7%	.6%	29.9%
Home Improvement	Other	961	815	820	748	534	360	266	316	4,820
	HAL	193	174	200	203	117	51	27	15	980
	Percent HAL	16.7%	17.6%	19.6%	21.3%	18.0%	12.4%	9.2%	4.5%	16.9%
Refinancing	Other	4,755	3,252	1,813	1,352	893	1,096	998	906	15,065
	HAL	1,643	2,224	1,646	804	323	107	24	13	6,784
	Percent HAL	25.7%	40.6%	47.6%	37.3%	26.6%	8.9%	2.3%	1.4%	31.0%
Total	Other	8,926	6,870	4,731	3,903	2,765	2,582	2,260	1,987	34,024
	HAL	2,981	4,486	3,541	1,702	287	101	7	5	13,787
	Percent HAL	25.0%	39.5%	42.8%	30.4%	20.8%	9.1%	2.5%	1.6%	28.8%

Table 13.C.17
HALs Originated by Race of Borrower
 13. City of Cleveland
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	5	6	10	0	1	0	0	0	22
Asian	13	14	18	7	3	1	1	0	57
Black	516	1,097	959	403	118	31	3	2	3,129
White	378	679	512	215	145	58	2	3	1,992
Not Available	230	292	196	70	20	11	1	0	820
Not Applicable	3	0	0	0	0	0	0	0	3
Total	1,145	2,088	1,695	695	287	101	7	5	6,023
Hispanic (Ethnicity)	50	113	97	45	24	16	0	0	345

Table 13.C.18
Rate of HALs Originated by Race/Ethnicity of Borrower
 13. City of Cleveland
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	13.9%	33.3%	76.9%	.0%	6.7%	.0%	.0%	.0%	23.4%
Asian	14.0%	15.6%	29.0%	16.7%	9.7%	3.7%	4.3%	.0%	15.0%
Black	34.4%	58.6%	62.5%	44.5%	22.2%	9.5%	1.4%	1.2%	44.3%
White	16.5%	27.1%	27.5%	15.9%	15.4%	7.6%	.3%	.6%	18.3%
Not Available	55.6%	72.8%	60.9%	35.5%	19.4%	10.9%	1.0%	.0%	47.8%
Not Applicable	14.3%	.0%	%	%	.0%	.0%	%	.0%	12%
Average	26.3%	42.7%	44.7%	27.8%	17.7%	8.2%	0.7%	0.6%	29.9%
Non-Hispanic Ethnicity	24.0%	40.2%	44.6%	28.1%	17.3%	7.4%	.7%	.8%	28.9%
Hispanic (Ethnicity)	16.0%	32.6%	35.0%	21.1%	20.0%	15.1%	.0%	.0%	22.4%

Table 13.C.19
Loans by HAL Status by Race/Ethnicity of Borrower
 13. City of Cleveland
 2004–2011 HMDA Data

Race	Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Other	31	12	3	3	14	3	2	4	72
	HAL	5	6	10	0	1	0	0	0	22
	Percent HAL	13.9%	33.3%	76.9%	.0%	6.7%	.0%	.0%	.0%	23.4%
Asian	Other	80	76	44	35	28	26	22	12	323
	HAL	13	14	18	7	3	1	1	0	57
	Percent HAL	14.0%	15.6%	29.0%	16.7%	9.7%	3.7%	4.3%	.0%	15.0%
Black	Other	983	775	576	502	414	297	216	169	3,932
	HAL	516	1,097	959	403	118	31	3	2	3,129
	Percent HAL	34.4%	58.6%	62.5%	44.5%	22.2%	9.5%	1.4%	1.2%	44.3%
White	Other	1,914	1,829	1,349	1,136	798	709	657	503	8,895
	HAL	378	679	512	215	145	58	2	3	1,992
	Percent HAL	16.5%	27.1%	27.5%	15.9%	15.4%	7.6%	0.3%	0.6%	18.3%
Not Available	Other	184	109	126	127	83	90	99	76	894
	HAL	230	292	196	70	20	11	1	0	820
	Percent HAL	55.6%	72.8%	60.9%	35.5%	19.4%	10.9%	1.0%	.0%	47.8%
Not Applicable	Other	18	2	0	0	1	1	0	0	23
	HAL	3	0	0	0	0	0	0	0	3
	Percent HAL	14.3%	.0%	%	%	.0%	.0%	%	.0%	12.0%
Total	Other	3,210	2,803	2,098	1,803	1,338	1,126	996	765	14,139
	HAL	1,145	2,088	1,695	695	287	101	7	5	6,023
	Percent HAL	26.3%	42.7%	44.7%	27.8%	17.7%	8.2%	.7%	.6%	29.9%
Non-Hispanic Ethnicity	Other	2,486	2,450	1,790	1,520	1,164	949	830	614	11,803
	HAL	786	1,644	1,439	593	243	76	6	5	4,792
	Percent HAL	24.0%	40.2%	44.6%	28.1%	17.3%	7.4%	.7%	.8%	28.9%
Hispanic (Ethnicity)	Other	263	234	180	168	96	90	81	83	1,195
	HAL	50	113	97	45	24	16	0	0	345
	Percent HAL	16.0%	32.6%	35.0%	21.1%	20.0%	15.1%	.0%	.0%	22.4%

Table 13.C.20
Rates of HALs by Income of Borrower
 13. City of Cleveland
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Average
\$15,000 or Below	17.2%	29.6%	34.5%	18.2%	36.0%	17.9%	.0%	6.7%	19.8%
\$15,001–\$30,000	29.0%	49.8%	47.4%	35.2%	23.2%	7.7%	.8%	2.0%	33.2%
\$30,001–\$45,000	28.1%	47.0%	49.6%	31.5%	19.8%	8.9%	.7%	.0%	33.8%
\$45,001–\$60,000	29.9%	40.7%	48.5%	25.4%	16.5%	9.4%	1.0%	.0%	30.8%
\$60,001–\$75,000	20.8%	35.6%	35.3%	24.0%	10.9%	7.1%	.0%	.0%	23.8%
Above \$75,000	10.2%	22.7%	24.5%	11.8%	5.8%	4.8%	0.7%	.0%	14.2%
Data Missing	24.1%	35.0%	50.0%	30.0%	10.0%	.0%	.0%	.0%	32.0%
Average	26.3%	42.7%	44.7%	27.8%	17.7%	8.2%	.7%	.6%	29.9%

Table 13.C.21
Loans by HAL Status by Income of Borrower
 13. City of Cleveland
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Other	24	19	19	27	16	23	36	14	178
	HAL	5	8	10	6	9	5	0	1	44
	Percent HAL	17.2%	29.6%	34.5%	18.2%	36.0%	17.9%	.0%	6.7%	19.8%
\$15,001–\$30,000	Other	855	575	432	384	305	289	263	199	3,302
	HAL	350	570	389	209	92	24	2	4	1,640
	Percent HAL	29.0%	49.8%	47.4%	35.2%	23.2%	7.7%	.8%	2.0%	33.2%
\$30,001–\$45,000	Other	1,051	966	666	580	414	387	285	214	4,563
	HAL	410	855	656	267	102	38	2	0	2,330
	Percent HAL	28.1%	47.0%	49.6%	31.5%	19.8%	8.9%	.7%	.0%	33.8%
\$45,001–\$60,000	Other	561	534	405	346	294	193	197	139	2,669
	HAL	239	367	382	118	58	20	2	0	1,186
	Percent HAL	29.9%	40.7%	48.5%	25.4%	16.5%	9.4%	1.0%	.0%	30.8%
\$60,001–\$75,000	Other	286	233	185	146	106	105	62	67	1,190
	HAL	75	129	101	46	13	8	0	0	372
	Percent HAL	20.8%	35.6%	35.3%	24.0%	10.9%	7.1%	.0%	.0%	23.8%
Above \$75,000	Other	351	396	346	299	194	120	143	124	1,973
	HAL	40	116	112	40	12	6	1	0	327
	Percent HAL	10.2%	22.7%	24.5%	11.8%	5.8%	4.8%	.7%	.0%	14.2%
Data Missing	Other	82	80	45	21	9	9	10	8	264
	HAL	26	43	45	9	1	0	0	0	124
	Percent HAL	24.1%	35.0%	50.0%	30.0%	10.0%	.0%	.0%	.0%	32.0%
Total	Other	3,210	2,803	2,098	1,803	1,338	1,126	996	765	14,139
	HAL	1,145	2,088	1,695	695	287	101	7	5	6,023
	Percent HAL	26.3%	42.7%	44.7%	27.8%	17.7%	8.2%	.7%	.6%	29.9%

D. CRA DATA

Additional data tables related to Community Reinvestment Act (CRA) data are presented in this section.

Table 13.D.1
Small Business Loans Originated: \$100,000 or Less by Tract MFI
 13. City of Cleveland
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	1,796	1,525	1,349	50	610	5,330
2001	2,090	1,806	1,487	66	788	6,237
2002	2,269	1,976	1,734	81	836	6,896
2003	2,247	3,045	1,048	342	350	7,032
2004	2,277	2,954	962	260	321	6,774
2005	2,125	2,968	1,114	267	251	6,725
2006	3,009	4,212	1,551	429	467	9,668
2007	3,222	4,712	1,672	430	406	10,442
2008	2,410	3,241	1,243	372	315	7,581
2009	1,011	1,453	503	167	150	3,284
2010	908	1,296	477	173	146	3,000
2011	1,223	1,615	619	171	209	3,837
Total	24,587	30,803	13,759	2,808	4,849	76,806
Loan Amount (\$1,000s)						
2000	26,376	19,752	14,683	628	10,114	71,553
2001	25,323	17,989	14,874	1,043	10,228	69,457
2002	28,006	21,933	16,618	938	13,522	81,017
2003	23,389	34,522	10,227	4,452	5,062	77,652
2004	24,652	33,585	9,590	2,933	4,392	75,152
2005	26,995	36,849	12,585	3,620	4,551	84,600
2006	28,366	43,722	14,348	4,706	4,909	96,051
2007	33,233	52,148	15,963	5,000	4,416	110,760
2008	25,520	33,818	11,458	4,210	4,378	79,384
2009	12,946	21,159	5,855	2,104	2,598	44,662
2010	14,421	21,869	6,433	2,512	2,913	48,148
2011	21,212	26,648	9,094	2,799	3,377	63,130
Total	290,439	363,994	141,728	34,945	70,460	901,566

Table 13.D.2
Small Business Loans Originated: \$100,001 to \$250,000 by Tract MFI
 13. City of Cleveland
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	108	59	45	2	39	253
2001	109	77	62	2	57	307
2002	119	104	76	4	77	380
2003	95	122	27	16	25	285
2004	119	116	30	17	25	307
2005	121	112	41	19	15	308
2006	79	133	39	13	17	281
2007	91	110	25	13	11	250
2008	71	83	24	6	13	197
2009	37	82	16	2	13	150
2010	84	105	34	7	16	246
2011	85	99	28	15	14	241
Total	1,118	1,202	447	116	322	3,205
Loan Amount (\$1,000s)						
2000	18,528	10,845	7,909	400	7,254	44,936
2001	19,110	13,948	10,737	370	10,747	54,912
2002	21,731	19,808	14,205	700	14,919	71,363
2003	16,570	20,915	5,405	3,155	4,396	50,441
2004	21,270	20,911	5,858	3,067	4,699	55,805
2005	22,266	20,550	7,803	3,556	2,644	56,819
2006	14,490	24,326	7,301	2,675	3,115	51,907
2007	16,225	19,917	4,512	2,370	2,014	45,038
2008	13,439	15,145	4,494	1,021	2,396	36,495
2009	6,703	14,751	2,536	356	2,493	26,839
2010	15,760	19,229	6,511	1,493	2,612	45,605
2011	16,284	18,023	5,285	2,750	2,402	44,744
Total	202,376	218,368	82,556	21,913	59,691	584,904

Table 13.D.3
Small Business Loans Originated: More than \$250,000 by Tract MFI
 13. City of Cleveland
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	92	45	60	2	61	260
2001	111	54	61	8	60	294
2002	132	82	69	6	84	373
2003	80	125	40	19	29	293
2004	119	143	51	21	38	372
2005	124	131	43	22	26	346
2006	126	127	36	19	24	332
2007	85	125	36	16	13	275
2008	77	111	38	16	16	258
2009	72	75	29	10	12	198
2010	109	132	49	14	23	327
2011	84	108	44	11	19	266
Total	1,211	1,258	556	164	405	3,594
Loan Amount (\$1,000s)						
2000	47,665	22,793	34,095	801	31,722	137,076
2001	59,846	31,003	29,710	4,872	33,209	158,640
2002	71,685	44,906	35,809	4,260	46,998	203,658
2003	44,917	71,063	23,363	11,534	13,661	164,538
2004	59,890	80,371	28,882	11,871	20,656	201,670
2005	69,995	75,709	24,537	12,131	15,049	197,421
2006	69,956	73,168	20,800	11,290	14,692	189,906
2007	47,128	69,511	18,969	8,557	7,488	151,653
2008	41,536	61,675	20,382	8,552	9,194	141,339
2009	40,344	43,031	14,273	6,229	7,416	111,293
2010	61,385	74,118	28,256	7,199	12,348	183,306
2011	49,616	63,106	21,457	5,746	11,100	151,025
Total	663,963	710,454	300,533	93,042	223,533	1,991,525

Table 13.D.4
Small Business Loans to Businesses with Gross Annual Revenues of Less Than \$1 Million by Tract MFI
 13. City of Cleveland
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	693	607	495	20	233	2,048
2001	897	770	692	38	382	2,779
2002	642	505	410	30	301	1,888
2003	699	977	334	128	88	2,226
2004	719	949	305	94	89	2,156
2005	895	1,310	467	122	82	2,876
2006	983	1,524	534	136	104	3,281
2007	1,086	1,678	580	134	90	3,568
2008	648	975	381	90	61	2,155
2009	295	502	176	55	28	1,056
2010	302	522	168	39	33	1,064
2011	530	732	298	61	64	1,685
Total	8,389	11,051	4,840	947	1,555	26,782
Loan Amount (\$1,000s)						
2000	32,795	21,358	18,902	366	18,256	91,677
2001	33,098	24,615	20,225	3,959	15,795	97,692
2002	50,418	34,118	22,794	2,800	25,914	136,044
2003	24,623	46,172	12,193	6,992	6,487	96,467
2004	33,722	44,896	9,109	6,300	6,131	100,158
2005	34,388	42,873	12,058	3,341	3,631	96,291
2006	25,061	51,199	11,325	3,935	3,648	95,168
2007	29,296	39,093	14,463	4,234	2,962	90,048
2008	20,071	26,979	10,066	2,855	3,856	63,827
2009	6,503	17,039	5,367	1,665	761	31,335
2010	13,079	25,097	7,269	1,368	3,206	50,019
2011	18,433	21,853	8,580	1,607	2,000	52,473
Total	321,487	395,292	152,351	39,422	92,647	1,001,199

E. COMPLAINT DATA

This section contains data regarding fair housing complaints, as provided by the U.S. Department of Housing and Urban Development (HUD), the Ohio Civil Rights Commission (OCRC), the Fair Housing Contact Service (FHCS), the Housing Research and Advocacy Center, and the Fair Housing Resource Center (FHRC).⁶³ While some of these agency may be based in other areas of Northeast Ohio, they have reported complaint activities that originated in the City of Cleveland; and, consequently, this data is also reported herein.

⁶³ The FHCS is based in Akron and the FHRC is based in Painesville; however, some complainants from within the City of Cleveland used these services over the period for which data are available.

HUD COMPLAINTS

Table 13.E.1
Fair Housing Complaints by Basis
 13. City of Cleveland
 2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color	1	2		2	1	1			1	8
Disability	15	14	19	9	12	8	13	6	9	105
Family Status		3	4	9	14	31	25	26	17	129
National Origin		2		4	14	4	11	2	1	38
Race	6	14	19	22	34	15	23	5	6	144
Religion	2	3	2	2	10		2		1	22
Sex	2	1	5	11	5	9	8	1	5	47
Total Bases	26	39	49	59	90	68	82	40	40	493
Total Complaints	21	37	38	44	64	59	72	41	34	410

Table 13.E.2
Fair Housing Complaints by Issue
 13. City of Cleveland
 2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Discrimination in making of loans		1		3	2	1	1	1		9
Discrimination in terms, conditions or privileges relating to rental	6	12	14	7	11	9	20	3	3	85
Discriminatory refusal to rent	6	15	8	15	9	7	9	3	5	77
Discriminatory advertisement - rental					12	31	4	12	14	73
Discriminatory advertising, statements, and notices		1	3	1	13	3	26	11	4	62
Discriminatory terms, conditions, privileges, or services and facilities	1	2	3	6	7	5	10	7	9	50
Discriminatory refusal to negotiate for rental			1	1	1	2				5
Otherwise deny or make housing available						1	2	2		5
Failure to make reasonable accommodation	6	6	7	5	5	3	6	3	4	45
False denial or representation of availability - rental			1		3					4
Discriminatory financing (includes real estate transactions)	1		1	2						4
Discrimination in the terms or conditions for making loans				1		1	2			4
Discrimination in services and facilities relating to rental			1		2		1			4
Discriminatory acts under Section 818 (coercion, etc.)	3	4	4	4	2	2	5	3	4	31
Discrimination in terms, conditions, privileges relating to sale			1		1		1			3
Discriminatory refusal to sell				1		1				2
False denial or representation of availability					2					2
Refusing to provide insurance				2						2
Non-compliance with design and construction requirements (handicap)	1				1					2
Failure to provide usable doors	1								1	2
Failure to permit reasonable modification			1				1			2
Other discriminatory acts	3	4		3	1		1	3	2	17
Discriminatory refusal to rent and negotiate for rental	1	2	6	2	1	2	1	1		16
Blockbusting - rental						1				1
Discrimination in the selling of residential real property							1			1
Discrimination in the brokering of residential real property				1						1
Redlining - mortgage			1							1
Failure to provide accessible and usable public and common user areas	1									1
Total Issues	30	47	52	54	73	69	91	49	46	511
Total Complaints	21	37	38	44	64	59	72	41	34	410

Table 13.E.3
Fair Housing Complaints by Closure Status
 13. City of Cleveland
 2004–2012 HUD Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Administrative Closure	1	8	5	5	7	6	12	4	1	49
Cause (FHAP)	1	1	2	4	12	27	15	10	2	74
Conciliated / Settled	11	18	13	7	22	15	29	10	10	135
No Cause	8	10	18	28	23	11	16	8		122
Open								9	21	30
Total Complaints	21	37	38	44	64	59	72	41	34	410

HUD Complaints Found With Cause

Table 13.E.4
Fair Housing Complaints Found With Cause by Basis
 13. City of Cleveland
 2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color	1			1						2
Disability	8	8	9	3	6	4	8	1	2	49
Family Status		2	1	3	11	26	21	17	9	90
National Origin				1	7	3	5	2		18
Race	4	6	4	6	17	7	10		1	55
Religion	1		1		3					5
Sex	2			2	1	5	5	1	2	18
Total Bases	16	16	15	16	45	45	49	21	14	237
Total Complaints	12	19	15	11	34	42	44	20	12	209

Table 13.E.5
Fair Housing Complaints Found With Cause by Issue
 13. City of Cleveland
 2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Discriminatory advertisement - rental					10	28	4	5	8	55
Discrimination in making of loans		1		2	1		1			5
Discriminatory refusal to rent and negotiate for rental			1	1			1	1		4
Otherwise deny or make housing available						1	2	1		4
Discriminatory advertising, statements, and notices		1	1	1	5	1	18	9		36
Discriminatory refusal to rent	4	10	1	4	4	5	5	2		35
Discrimination in terms, conditions or privileges relating to rental	3	3	4	2	5	5	8		2	32
Failure to make reasonable accommodation	4	5	6	2	3	3	5	1	1	30
False denial or representation of availability - rental			1		2					3
False denial or representation of availability					2					2
Discrimination in the terms or conditions for making loans				1			1			2
Discrimination in services and facilities relating to rental			1				1			2
Other discriminatory acts	1			1						2
Non-compliance with design and construction requirements (handicap)	1				1					2
Discriminatory terms, conditions, privileges, or services and facilities		2			5	2	4	4	1	18
Discriminatory acts under Section 818 (coercion, etc.)	3	2	2	2	1		2	2		14
Discriminatory refusal to negotiate for rental			1							1
Blockbusting - rental						1				1
Discriminatory financing (includes real estate transactions)	1									1
Failure to permit reasonable modification			1							1
Total Issues	17	24	19	16	39	46	52	25	12	250
Total Complaints	12	19	15	11	34	42	44	20	12	209

OHIO CIVIL RIGHTS COMMISSION COMPLAINTS

Table 13.E.6
Fair Housing Complaints by Basis
 13. City of Cleveland
 2004–2012 OCR Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color	1	4		1	1	1				8
Disability	15	19	50	15	8	5	12	9	2	135
Family Status	1	2	7	6	10	5	8	8	5	52
Gender	2	4	6	9	7	4	12	1	3	48
National Origin		3		3	9		8			23
Race	15	18	10	17	11	15	15	8	3	116
Religion	1	2	2	3			2	1		11
Retaliation	4	13	6	9	6	4	7	2	4	55
Total Bases	39	65	81	63	60	30	64	29	17	448
Total Complaints	28	49	69	43	45	23	51	25	12	345

Table 13.E.7
Fair Housing Complaints by Issue
 13. City of Cleveland
 2004–2012 OCR Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Advertising		1	1		1	3	5	6	4	21
Discharge				2						2
Exclusion	6	18	2	7	11	4	6			54
Harassment	2	7		7	5		3	1	2	27
Intimidation	3	4	1	1		1			3	13
Other	8	15	23	18	17	7	25	7	1	121
Reasonable Accommodation	7	9	35	6	2	1	2	6	1	69
Recall			1							1
Sexual Harassment	1	1	1	3	3	2	1		2	14
Terms and Conditions	9	14	11	9	15	9	15	8	2	92
Testing				1						1
Total Issues	36	69	75	54	54	27	57	28	15	415
Total Complaints	28	49	69	43	45	23	51	25	12	345

Table 13.E.8
Fair Housing Complaints by Closure Status
 13. City of Cleveland
 2004–2012 OCR Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Administrative Closure	3	1		3	1	1	3		2	14
CP Failed to Cooperate		1	2	2		2	2	1		10
CP Refused Full Relief			27							27
CP Withdrawal – No Benefit	2	9	2	1	2	2	12	5		35
Failure to Locate Charging Party	1									1
Inquiry Closed		1								1
No Cause Finding Issued	10	15	16	30	21	7	15	12	2	128
No Jurisdiction		1	1	1						3
Open Charge Closed By Legal Activity			1							1
Settlement With Benefits	2	3	6	3	9	6	10	2	4	45
Successful Conciliation		1	1	2	4	3	3			14
Withdrawal With Benefits	10	17	13	1	8	2	6	5	4	66
Total Complaints	28	49	69	43	45	23	51	25	12	345

FAIR HOUSING CONTACT SERVICE COMPLAINTS

Table 13.E.9
Fair Housing Complaints by Basis
13. City of Cleveland
2004–2012 FHCS Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Criminal Background							1			1
Sex			1							1
Other							1			1
Total Bases	0	0	1	0	0	0	2	0	0	3
Total Complaints			1				1			2

Table 13.E.10
Fair Housing Complaints by Closure Status
13. City of Cleveland
2004–2012 FHCS Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Inquiry			1							1
Referred for other assistance							1			1
Total Complaints	0	0	1	0	0	0	1	0	0	2

FAIR HOUSING RESOURCE CENTER COMPLAINTS

Table 13.E.11
Fair Housing Complaints by Basis
13. City of Cleveland
2004– 2012 FHRC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability		1	1			1	1			4
Race	1									1
Other								1		1
Total Bases	1	1	1	0	0	1	1	1	0	6
Total Complaints	1	1	1			1	1	1		6

Table 13.E.12
Fair Housing Complaints by Issue Type
13. City of Cleveland
2004– 2012 FHRC Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Rental	1	1	1			1	1	1		6
Total	1	1	1	0	0	1	1	1	0	6

Table 13.E.13
Fair Housing Complaints by Closure Status
13. City of Cleveland
2004– 2012 FHRC Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Settled through counseling		1	1	1			1	1	1	6
Total		1	1	1	0	0	1	1	1	6

THE HOUSING RESEARCH AND ADVOCACY CENTER

Table 13.E.14
Fair Housing Complaints by Basis

13 City of Cleveland
2004–2012 HRAC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability			4	5	3	11	29	20	23	95
Race	1	4	6	4	3	5	11	4	8	46
Familial Status		1	2	4	1	4	6	2	1	21
Gender			1			1	1	7	7	17
Sex			1			1	8	2	1	13
National Origin	1		1	4	1				2	9
Color									8	8
Other									6	6
Source of Income			3	1						4
Criminal History							1		2	3
Age						1			1	2
Ethnicity									2	2
N.A.								2		2
Sexual Orientation			1				1			2
Religion									1	1
Total Bases	2	5	19	18	8	23	57	37	62	231
Total Complaints	2	5	11	15	8	20	50	31	41	183

Table 13.E.15
Fair Housing Complaints by Issue

13 City of Cleveland
2004–2012 HRAC Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Rental	2	5	11	9	6	20	42	31	38	164
Sale				6	1					7
Other							3		3	6
Shelter							5			5
Mortgage					1					1
Total	2	5	11	15	8	20	50	31	41	183
Total Complaints	2	5	11	15	8	20	50	31	41	183

Table 13.E.16
Fair Housing Complaints by Action Taken

13 City of Cleveland
 2004–2012 HRAC Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Reasonable Accommodation				2		3	6	4	7	22
Fair Housing Info Given			5	4	2	10	15	10	26	72
Referred to OCRC	2	5	5	6	4	5	19	9	16	71
Referred to Attorney	1			5	1	1	4	5		17
HRAC Conducted Test		2	1	4	1	1		2		11
Agency complaint with OCRC		1		1						2
Referred to City			2				2		1	5
Referred to ACLU										0
Total	3	8	13	22	8	20	46	30	50	200
Total Complaints	2	5	11	15	8	20	50	31	41	183

F. FAIR HOUSING SURVEY FOR HOUSING STAKEHOLDERS DATA

This section presents public involvement data gathered through the 2012–2013 Fair Housing Survey for Housing Stakeholders.

Table 13.F.1

Primary Role of Respondent

13. City of Cleveland
 2012–2013 Fair Housing Survey for Housing
 Stakeholders Data

Primary Role	Total
Advocate/Service Provider	13
Local Government	6
Construction/Development	2
Banking/Finance	1
Condo or Homeowner Association Leader	1
Insurance	1
Property Management	1
Real Estate	1
Resident Advisory Council Leader	1
Other Role	9
Total	36

FEDERAL, STATE, AND LOCAL LAWS

Table 13.F.2
Familiarity with Fair Housing Laws

13. City of Cleveland
2012–2013 Fair Housing Survey for Housing Stakeholders Data

Familiarity	Total
Not Familiar	3
Somewhat Familiar	11
Very Familiar	11
Missing	11
Total	36

Table 13.F.3
Perceptions About Fair Housing Laws

13. City of Cleveland
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?	24		1	11	36
Are fair housing laws difficult to understand or follow?	6	13	5	12	36
Do you think fair housing laws should be changed?	9	8	7	12	36
Do you think fair housing laws are adequately enforced?	16	6	1	13	36

Table 13.F.4
Fair Housing Activities

13. City of Cleveland
2012–2013 Fair Housing Survey for Housing Stakeholders Data

2012 - 2016 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?		16	6	1	13	36
Have you participated in fair housing training?		14	3		19	36
Are you aware of any fair housing testing?		10	9	4	13	36
Testing and education	Too Little	Right Amount	Too Much	Don't Know	Missing	Total
Is there sufficient outreach and education activity?	11	5	1	5	14	36
Is there sufficient testing?	8	2		13	13	36

Table 13.F.5**Protected Classes**

13. City of Cleveland
2012–2013 Fair Housing Survey
for Housing Stakeholders Data

Protected Class	Total
Family Status	16
Religion	11
Gender	11
National Origin	12
Color	8
Sexual Orientation	9
Age	8
Military	6
Disability	1
Ancestry	5
Ethnicity	3
Race	1
Other	14
Total	105

Table 13.F.6**Fair Housing Violation Referrals**

13. City of Cleveland
2012–2013 Fair Housing Survey for Housing
Stakeholders Data

Referral	Total
ACLU	1
City	3
Cleveland Fair Housing Board	4
Cleveland Tenants Organization	6
Don't Know	1
Fair Housing Resource Center	1
Heights Community Congress	1
Housing Advocates, Inc.	1
Housing Research and Advocacy Center	1
HUD	8
Legal Aid	2
OCRC	6
Other	2
Total	37

LOCAL FAIR HOUSING**Table 13.F.7****Local Fair Housing**

13. City of Cleveland
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?	13	7	2	14	36
Are there any specific geographic areas that have fair housing problems?	4	7	11	14	36
Are there any specific groups in that face housing discrimination?	5	6	9	16	36

FAIR HOUSING IN THE PRIVATE SECTOR

Table 13.F.8

Barriers to Fair Housing in the Private Sector

13. City of Cleveland

2012–2013 Fair Housing Survey for Housing Stakeholders Data

Question	Yes	No	Don't Know	Missing	Total
Are you aware of any questionable practices or barriers to fair housing choice in:					
The rental housing market?	5	12	4	15	36
The real estate industry?	5	10	6	15	36
The mortgage and home lending industry?	7	7	8	14	36
The housing construction or accessible housing design fields?	6	8	9	13	36
The home insurance industry?	5	6	12	13	36
The home appraisal industry?	5	6	11	14	36
Any other housing services?	3	6	13	14	36

FAIR HOUSING IN THE PUBLIC SECTOR

Table 13.F.9

Barriers to Fair Housing in the Public Sector

13. City of Cleveland

2012–2013 Fair Housing Survey for Housing Stakeholders Data

Question	Yes	No	Don't Know	Missing	Total
Are you aware of any questionable practices or barriers to fair housing choice in:					
Land use policies?	3	14	5	14	36
Zoning laws?	4	8	9	15	36
Occupancy standards or health and safety codes?	4	10	8	14	36
Property tax policies?	1	11	10	14	36
Permitting process?	2	9	10	15	36
Housing construction standards?	2	12	8	14	36
Neighborhood or community development policies?	5	10	7	14	36
Limited access to government services, such as employment services?	6	12	3	15	36
Public administrative actions or regulations?	3	9	10	14	36

NARRATIVE COMMENTS

Federal, State, and Local Laws

Table 13.F.10

How did you become aware of fair housing laws?

13. City of Cleveland

2013 Fair Housing Survey Data

Comments:
<p>As a landlord and community development professional Attending workshops Because of my professional work experience in areas of community development and public housing. Being educated as a fair housing board member By living in communities that stressed pro-integration policies. Conferences, Meetings, Studying them...etc.. I have worked in the Fair Housing non-profit field since 2000. Internet HUD NFCC It be the job for which I do. Research and seminars. The PHA does periodic trainings for staff, and I also regularly attend housing conferences and workshops. Through participating on various community related development efforts that dealt with housing regulations. Training sessions and workshops are attended by staff. We review HUD notifications. We're a fair housing agency. Worked as a CSR for Banks- Loan officer and now in the City Fair Housing Board Working closely and sharing contracts with The Housing Research and Advocacy Center</p>

Table 13.F.11
How should fair housing laws be changed?

13. City of Cleveland
 2013 Fair Housing Survey Data

Comments:
<p>Add ban the box...Discrimination based on Felony/arrest records.</p> <p>Additional protected classes, particularly Sexual Orientation should be added</p> <p>All People with Children don't need to be in ashelter for no longer than 2 days because this is to tramatic for all involved be it a fire abuse etc.. Too many empty homes that need to be occupied and adaquately repaired.First time done job that last a lifetime no work done shabby to get more money in the near futrue. On going program to assist elderly in any repairs of older sturtured property.</p> <p>Fair housing laws need to be more inclusive off vulnerable populations not just based on ethnicity and disability. seniors, renters, low income, populations, and students should all be protected classes in my opinion.</p> <p>Sexual Orientation should be added.</p> <p>should add sexual preference or identiy</p> <p>They should be strengthened for enforcement purposes and to include additional protected classes.</p> <p>To afford greater protection to wider groups and harsher penalties for violators.</p> <p>to included formerly incarcerated persons as a portected class</p>

Local Fair Housing

Table 13.F.12
Are there any specific geographic areas that have fair housing problems?

13. City of Cleveland
 2013 Fair Housing Survey Data

Comments:
<p>All areas in the County have Fair Housing issues. Personally seen them in Cleveland, North Olmsted, Lakewood, Westlake, Rocky River, Olmsted Falls, South Euclid, Cleveland Hts., Solon, Mayfield Hts., Strongsville, Middleburg Hts., Shaker Hts, Cuyahga Hts. (race, national origin, religion, family status, disability)</p> <p>All geographic areas. Housing discrimination occurs everywhere.</p> <p>Little Italy, various other enclaves in the city, specifically ethnic ones</p> <p>There is a perception of Fair housing issues in key growth areas of our city.</p>

Table 13.F.13
Are there any specific groups in that face housing discrimination?

13. City of Cleveland
 2013 Fair Housing Survey Data

Comments:
<p>All members of protected classes and individuals who have been incarcerated, pay their rent with sources of income other than employment, among others.</p> <p>Formerly incarcerated persons often face discrimination when attempting secure housing</p> <p>Muslims/Arabs, Latinos (all), African Americans, families with children, people with disabilities</p> <p>Possibly-Those with felony records</p> <p>Racial and ethnic minorities</p> <p>Racial minorities in particular seem most prevalent</p>

Table 13.F.14
Please share any additional comments.

13. City of Cleveland
 2013 Fair Housing Survey Data

Comments:
<p>All of the potential violations of the federal, state, and local fair housing laws occur in our area. Housing discrimination and segregated communities are a growing problem that effect not only where one lives but in many respects ones life chances through access to quality schools, transportation, employment, and a healthy environment. The health and sustainability of the community as a whole suffers without housing choice and integration. I would be happy to talk with you about any of these issues in more detail.</p> <p>given the fast number of persons returning to their community after a period of incarceration I would strongly advocate for making such persons a protected class to end housing discrimination against them.</p> <p>It is an important issue.</p>

Fair Housing in the Private Sector

Table 13.F.15

Are you aware of any questionable practices or barriers to fair housing choice in the rental housing market?

13. City of Cleveland
2013 Fair Housing Survey Data

Comments:
Landlords who don't want to rent to families with children and try to advertise "no children" which is illegal. Refusal to rent, differences in price/fees, denial of reasonable modifications & accommodations, Segregation resulting from housing discrimination against all protected classes Lack of accessible housing for people with disabilities Discrimination against families with children based on incorrect occupancy We would be happy to discuss these issues in more detail. Specific neighborhoods - less welcoming to minorities, like Little Italy...Gentrifying neighborhoods like Tremont with little affordable housing There are landlords who prefer not to rent to people with what they consider to be too many children. I have also heard of families who have trouble renting housing in certain areas because of reluctance to accept Housing Choice Vouchers. This can make it difficult for families to have adequate housing options.

Table 13.F.16

Are you aware of any questionable practices or barriers to fair housing choice in the real estate industry?

13. City of Cleveland
2013 Fair Housing Survey Data

Comments:
I know someone who sued their realtor because they were not being permitted to view all available housing within a community. The realtor was showing African American families homes in specific sections of the city. Steering Blockbusting Lack of knowledge about fair housing laws Lack of supervision and training of real estate agents by brokerage firms Steering, differences in level of service tend to be biased against Cleveland neighborhoods The amount of segregation must point to some racial steering.

Table 13.F.17

Are you aware of any questionable practices or barriers to fair housing choice in the mortgage and home lending industry?

13. City of Cleveland
2013 Fair Housing Survey Data

Comments:
A lot of the foreclosures on homes in the area were filed against minorities, many women who were victims of lending scams Differences in level of service, rates, loan products, application requirements It is my belief that people of different races are treated substantially differently by the lending community. Minorities are denied access to credit or charged higher interest rates. Loan products that were developed such as the interest only product and the ARM loan product created a scenario that adversely impacted racial minorities more than other ethnic groups. These loan products were used more consistently in urban areas to finance homes and rental properties. Mortgages are offered in only certain areas and Private mortgage insurance is disproportionately applied to minorities People of color are denied and receive high-cost loans more often. Redlining Different terms and conditions Inaccessible information about lending practices

Table 13.F.18

Are you aware of any questionable practices or barriers to fair housing choice in the housing construction or accessible housing design fields?

13. City of Cleveland
2013 Fair Housing Survey Data

Comments:
Inaccessible housing Lack of knowledge or ignoring building code and fair housing law requirements Differences in treatment based on location/neighborhood of property. More Universal Design is needed. Recently, K&D got in a major suit over building inaccessible housing and bribing building officials

Table 13.F.19**Are you aware of any questionable practices or barriers to fair housing choice in the home insurance industry?**

13. City of Cleveland
2013 Fair Housing Survey Data

Comments:
In the insurance industry many companies fail to ensure homes in communities with an older housing stock and they refuse in some respects to insure rental property due to age of the housing and the type of features that exist in the homes. Most of the homes in urbanized areas are occupied by minorities and renters which are protected classes. by virtue of looking at housing age and rental factors you are by default making it difficult to obtain or maintain insurance for certain groups. Even if the basis for insurance companies decision are not racially motivated, the factors in which insurance companies make decisions on who to ensure and at what rate will impact certain groups more than others.
Limiting policies and coverages to racial minorities
often difficult to get insurance coverage in low income areas
Redlining Different terms and conditions Inaccessible information about practices Differences in treatment based on location/neighborhood of property.

Table 13.F.20**Are you aware of any questionable practices or barriers to fair housing choice in the home appraisal industry?**

13. City of Cleveland
2013 Fair Housing Survey Data

Comments:
Basing home values on the racial & ethnic composition of neighborhoods.
its a known fact that lower income minority communities housing stock appraises lower than non-minority communities. The reason for this one can assume is not primarily condition of the housing stock. when racial composition changes in neighborhoods so does the housing values in those communities.
many homes in minority areas were valued below there actual value
Redlining Different terms and conditions Inaccessible information about practices Differences in treatment based on location/neighborhood of property.
The changing real estate market has affected rental comparable and property values.

Table 13.F.21**Are you aware of any questionable practices or barriers to fair housing choice in any other housing services?**

13. City of Cleveland
2013 Fair Housing Survey Data

Comments:
Differences in treatment of individuals and maintenance of property based on location/neighborhood of property.
In Ward 1 in Garfield minority interest seeking to purchase a home in the Garfield community are steered to the Ward 1 area of the City. Many of those minorities who desire to live in that community because of the school system end up in Ward 1 because that area of Garfield falls under the CMSD jurisdiction. By steering minorities to this area those families with school aged children don't get the benefit of going to Garfield schools, rather they must attend John Adams which is a CMSD institution.

Fair Housing in the Public Sector**Table 13.F.22****Are you aware of any questionable practices or barriers to fair housing choice in land use policies?**

13. City of Cleveland
2013 Fair Housing Survey Data

Comments:
Concentration of multi-family housing in segregated areas.
more and more we are seeing the desire to create compact mixed use communities that offer convenience by promoting walkability and creates sustainable developments. However many of the developments that are created concentrate people of similar incomes and social status. We are moving toward a mixed income scenario with some developments however it is not as much as we need
Policies that concentrate multi-family housing in limited areas

Table 13.F.23**Are you aware of any questionable practices or barriers to fair housing choice in zoning laws?**

13. City of Cleveland
2013 Fair Housing Survey Data

Comments:
Group homes and other such uses are restricted and need to be heard before the Board of Zoning Appeals Laws that restrict placement of group homes Prohibition of group homes. Restrictive definitions of families.

Table 13.F.24**Are you aware of any questionable practices or barriers to fair housing choice in occupancy standards or health and safety codes?**

13. City of Cleveland
2013 Fair Housing Survey Data

Comments:
Certain suburbs are more active in monitoring and forcing the correction of health and safety codes than others. There is often more attention paid to higher income subsections of the community. Inadequate code enforcement in communities of color and immigrant communities. Restrictions on definition of family, overly restrictive occupancy There are health and safety code violations that are not adequately enforced in low income minority communities due to the impact of the housing crisis (foreclosed/substandard housing) in many of these areas. The volume of housing issues outweighs our ability to police.

Table 13.F.25**Are you aware of any questionable practices or barriers to fair housing choice in property tax policies?**

13. City of Cleveland
2013 Fair Housing Survey Data

Comments:
Disinvestment and foreclosures resulting from lending discrimination result in diminished property values in minority neighborhoods.

Table 13.F.26**Are you aware of any questionable practices or barriers to fair housing choice in the permitting process?**

13. City of Cleveland
2013 Fair Housing Survey Data

Comments:
Permits denied based on protected class or segregated neighborhood. Permit requirements not followed in segregated neighborhoods. we do not currently offer permitting process information in alternative languages via the internet or otherwise.

Table 13.F.27**Are you aware of any questionable practices or barriers to fair housing choice in housing construction standards?**

13. City of Cleveland
2013 Fair Housing Survey Data

Comments:
Although accessibility requirements are in the Ohio Building Codes, the local building inspectors have no training on those standards, and approve plans that are not accessible Lack of enforcement. Building officials don't have to certify that residences are accessible prior to construction or occupancy permitting.

Table 13.F.28**Are you aware of any questionable practices or barriers to fair housing choice in neighborhood or community development policies?**

13. City of Cleveland
2013 Fair Housing Survey Data

Comments:
Community development efforts are too strongly focused on the areas of greatest need. More effort should be made to strengthen areas with some market confidence so that they can remain solid and grow. Gentrifying neighborhoods focused on eliminating affordable housing, thus a disparate impact on people of color investments in "trendy" neighborhoods result in displacement of current residents policies that encourage development in narrowly defined areas of the community Policies that encourage economic development without considering the impact on existing residential communities when developments occur in racially or ethnically segregated communities.

Table 13.F.29**Are you aware of any barriers that limit access to government services, such as a lack of transportation or employment services?**

13. City of Cleveland
2013 Fair Housing Survey Data

Comments:
for many with low-incomes transportation to various government services can present a problem if the service is located out of their area. lack of transportation or employment services Public transit is limit, difficult, and hard to navigate. The ticketing machines are next to impossible. Very hard to use. Disparate impact on the poor and people of color. Transportation Transportation system is biased to the automobile. Transportation, especially for people with disabilities.

Table 13.F.30**Are you aware of any questionable practices or barriers to fair housing choice in any other public administrative actions or regulations?**

13. City of Cleveland
2013 Fair Housing Survey Data

Comments:
Certain cities make it more difficult for landlords to rent out the houses. For example, they may impose high Certificate of Occupancy fees in order to make it less attractive.
Sustainable construction requirements and LEED residential developments are targeted for high end properties and developments instead of lower income residential projects.
There are too many to detail within the scope of this survey.

G. LAND USE PLANNING SURVEY DATA

This section contains data regarding the potential effects of local land use and housing policies on fair housing choice, as gathered from the Land Use Planning Interview.

ENTITLEMENT COMMUNITY LAND USE PLANNING INTERVIEWS

In the Region's 18 entitlement cities and four entitlement counties, public sector policies were evaluated through individual telephone interviews that followed the structure of the 2012–2013 Fair Housing Survey for Government Officials, an online survey for nonentitlement community planning staff. This allowed for more thorough answers to the same key questions about public sector policies.

The appropriate planning and community development staff person or persons at these communities was solicited from members of the Progress Review Team, representing each entitlement community.

Table 13.G.1**Housing Development**

13. City of Cleveland
2012 Land Use Planning Interview Data

Question: Does your jurisdiction...	Response
Housing Development	
Have a definition for the term "dwelling unit"?	Yes
Encourage or allocate funding for affordable housing development?	Yes
Have any potential barriers to the development of low- to moderate- income housing?	Don't know
Occupancy Standards	
Have a definition for the term "family"?	Yes
Have any residential occupancy standards or limits?	Don't know
Allow the mixed-use housing development?	Yes
Have any potential barriers to the development of mixed-use housing?	Don't Know
Special Needs Housing	
Have a definition for the term "disability"?	Yes
Have any particular standards/policies regarding accessible housing?	Yes
Have any special process for persons with disabilities to request variances for accessible housing?	Yes
Have any special standards for the development of senior housing?	Yes
Distinguish senior citizen housing from other residential uses in any way?	Yes
Address group housing, or have any special policies for any other special needs housing?	Yes
Fair Housing Policies	
Have a fair housing ordinance, policy, or regulation?	Yes
Participate in any activities or practices for "affirmatively furthering fair housing"?	Yes

H. IMPEDIMENTS

The *2013 Northeast Ohio Regional Analysis of Impediments to Fair Housing Choice* uncovered several potential issues regarding fair housing in the City of Cleveland. Identification of these items as probable impediments to fair housing choice was based on HUD's definition of impediments as actions, omissions, or decisions that restrict housing choice due to protected class status or actions, omissions, or decisions that have this effect. The identified impediments are supported by evidence uncovered during the Regional AI process, with impediments of higher need being those identified in multiple sources.

These probable impediments in the entirety of the Northeast Ohio Region are presented in **Volumes I and II** of the Regional AI. They are accompanied by suggested actions that jurisdictions in the Region may implement in order to alleviate or eliminate these impediments, and are accompanied by measurable objectives. The goal of these actions and measureable objectives is to assist these agencies in offering greater housing choice for all citizens of the Northeast Ohio Region.

The following list presents the private and public sector impediments found in the City of Cleveland.

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 Cleveland. 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 City 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 City of Cleveland, 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 City 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 City. 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 outreach and education efforts in the City of Cleveland.*

While Northeast Ohio tends to have a strong fair housing advocacy base and has been partnering with the NEO Fair Housing Collaboration, Cleveland Municipal Housing Cort, the NAACP and the Heights Community Congress, the lack of knowledge of fair housing by many consumers seems to persist in Cleveland. Consequently, the problem is large and 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: Enhance outreach and educational activities in a uniform, methodical, and consistent fashion. This should be done in consort with local for-profit and non-profit entities as cosponsors.

2. *Impediment:* Policies and practices used decades ago have resulted in segregation of minority populations

Fair housing choice in the City is today still affected by bygone historical policies and practices that resulted in segregation of minority populations in the City of Cleveland. 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 City of Cleveland. 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 City. 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.

IMPEDIMENTS MATRIX

The matrix on the following page includes the impediment, data source, or sources that indicated its existence, protected classes most affected, and ranking of need for action. Level of need for action was determined based on the number of data sources that identified each impediment.

Table 13.H.1
Impediments Matrix
 13. City of Cleveland
 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 ⁶⁴		
Private Sector												
1	Denial of available housing units in the rental markets		X				X	X			Black and Hispanic persons	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 outreach and education efforts							X	X	X	All	H
2	Policies and practices used decades ago resulted in segregation of minority populations		X					X		X	All	H

⁶⁴ 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.

14. CITY OF CLEVELAND HEIGHTS

A. CENSUS BUREAU DATA

This section contains additional data from the U.S. Census Bureau.

Table 14.A.1

Population by Age

14. City of Cleveland Heights
2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Under 5	3,084	6.2%	2,810	6.1%	-8.9%
5 to 19	9,898	19.8%	8,645	18.7%	-12.7%
20 to 24	3,526	7.1%	3,685	8.0%	4.5%
25 to 34	8,336	16.7%	7,396	16.0%	-11.3%
35 to 54	14,965	30.0%	11,244	24.4%	-24.9%
55 to 64	4,295	8.6%	6,095	13.2%	41.9%
65 or Older	5,854	11.7%	6,246	13.5%	6.7%
Total	49,958	100.0%	46,121	100.0%	-7.7%

Table 14.A.2

Elderly Population by Age

14. City of Cleveland Heights
2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
65 to 66	659	11.3%	883	14.1%	34.0%
67 to 69	949	16.2%	1,135	18.2%	19.6%
70 to 74	1,493	25.5%	1,406	22.5%	-5.8%
75 to 79	1,284	21.9%	1,109	17.8%	-13.6%
80 to 84	839	14.3%	871	13.9%	3.8%
85 or Older	630	10.8%	842	13.5%	33.7%
Total	5,854	100.0%	6,246	100.0%	6.7%

Table 14.A.3

Population by Race and Ethnicity

14. City of Cleveland Heights
2000 & 2010 Census SF1 Data

Race	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
White	26,229	52.5%	22,984	49.8%	-12.4%
Black	20,873	41.8%	19,587	42.5%	-6.2%
American Indian	81	.2%	74	.2%	-8.6%
Asian	1,280	2.6%	1,900	4.1%	48.4%
Native Hawaiian/ Pacific Islander	5	.0%	6	.0%	20.0%
Other	338	.7%	275	.6%	-18.6%
Two or More Races	1,152	2.3%	1,295	2.8%	12.4%
Total	49,958	100.0%	46,121	100.0%	-7.7%
Non-Hispanic	49,167	98.4	45,218	98.0%	-8.0%
Hispanic	791	1.6%	903	2.0%	14.2%

Table 14.A.4**Disability by Age**14. City of Cleveland Heights
2010 Three-Year ACS Data

Age	Male		Female		Total	
	Disabled Population	Disability Rate	Disabled Population	Disability Rate	Disabled Population	Disability Rate
Under 5	0	.0%	18	1.3%	18	.7%
5 to 17	251	6.8%	142	3.8%	393	5.3%
18 to 34	161	2.6%	73	1.2%	234	1.9%
35 to 64	876	11.2%	1,093	11.2%	1,969	11.2%
65 to 74	282	17.7%	477	24.4%	759	21.4%
75 or Older	367	41.6%	1,052	56.5%	1,419	51.7%
Total	1,937	9.0%	2,855	11.6%	4,792	10.4%

Table 14.A.5**Employment Status by Disability and Type: Age 18 to 64**14. City of Cleveland Heights
2010 Three-Year ACS Data

Disability Status	Population
Employed:	21,644
With a disability:	1,058
With a hearing difficulty	100
With a vision difficulty	94
With a cognitive difficulty	231
With an ambulatory difficulty	778
With a self-care difficulty	256
With an independent living difficulty	261
No disability	20,586
Unemployed:	2,112
With a disability:	201
With a hearing difficulty	31
With a vision difficulty	37
With a cognitive difficulty	103
With an ambulatory difficulty	64
With a self-care difficulty	44
With an independent living difficulty	58
No disability	1,911
Not in labor force:	5,901
With a disability:	944
With a hearing difficulty	114
With a vision difficulty	173
With a cognitive difficulty	417
With an ambulatory difficulty	578
With a self-care difficulty	278
With an independent living difficulty	533
No disability	4,957
Total	29,657

Table 14.A.6**Households by Income**

14. City of Cleveland Heights

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	2,942	14.1%	3,576	18.3%
\$15,000 to \$19,999	1,247	6.0%	967	4.9%
\$20,000 to \$24,999	1,074	5.1%	933	4.8%
\$25,000 to \$34,999	2,343	11.2%	1,851	9.5%
\$35,000 to \$49,999	3,517	16.8%	2,734	14.0%
\$50,000 to \$74,999	4,416	21.1%	3,352	17.2%
\$75,000 to \$99,999	2,191	10.5%	2,382	12.2%
\$100,000 or More	3,202	15.3%	3,745	19.2%
Total	20,932	100.0%	19,540	100.0%

Table 14.A.7**Poverty by Age**

14. City of Cleveland Heights

2000 Census SF3 & 2010 Five-Year ACS Data

Age	2000 Census		2010 Five-Year ACS	
	Persons in Poverty	% of Total	Persons in Poverty	% of Total
Under 6	414	7.8%	803	9.2%
6 to 17	867	16.4%	2,098	23.9%
18 to 64	3,130	59.3%	5,063	57.8%
65 or Older	865	16.4%	798	9.1%
Total	5,276	100.0%	8,762	100.0%
Poverty Rate	10.6%	.	19.1%	.

Table 14.A.8**Households by Year Home Built**

14. City of Cleveland Heights

2000 Census SF3 & 2010 Five-Year ACS Data

Year Built	2000 Census		2010 Five-Year ACS	
	Households	% of Total	Households	% of Total
1939 or Earlier	11,407	54.5%	10,878	55.7%
1940 to 1949	3,443	16.4%	2,350	12.0%
1950 to 1959	2,983	14.2%	3,045	15.6%
1960 to 1969	1,252	6.0%	1,213	6.2%
1970 to 1979	947	4.5%	1,085	5.6%
1980 to 1989	617	2.9%	552	2.8%
1990 to 1999	298	1.4%	229	1.2%
2000 to 2004	.	.	131	.7%
2005 or Later	.	.	57	.3%
Total	20,947	100.0%	19,540	100.0%

Table 14.A.9**Housing Units by Type**

14. City of Cleveland Heights

2000 Census SF3 & 2010 Five-Year ACS Data

Unit Type	2000 Census		2010 Five-Year ACS	
	Units	% of Total	Units	% of Total
Single-Family	14,042	64.3%	14,477	65.1%
Duplex	1,306	6.0%	1,066	4.8%
Tri- or Four-Plex	1,340	6.1%	1,217	5.5%
Apartment	5,125	23.5%	5,475	24.6%
Mobile Home	13	.1%	0	.0%
Boat, RV, Van, Etc.	0	.0%	0	.0%
Total	21,826	100.0%	22,235	100.0%

Table 14.A.10**Housing Units by Tenure**

14. City of Cleveland Heights

2000 & 2010 Census SF1 Data

Tenure	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
Occupied Housing Units	20,913	95.9%	19,957	88.8%	-4.6%
Owner-Occupied	12,989	62.1%	11,242	56.3%	-13.4%
Renter-Occupied	7,924	37.9%	8,715	43.7%	10.0%
Vacant Housing Units	885	4.1%	2,508	11.2%	183.4%
Total Housing Units	21,798	100.0%	22,465	100.0%	3.1%

Table 14.A.11**Disposition of Vacant Housing Units**

14. City of Cleveland Heights

2000 & 2010 Census SF1 Data

Disposition	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
For Rent	415	46.9%	978	39.0%	135.7%
For Sale	161	18.2%	464	18.5%	188.2%
Rented or Sold, Not Occupied	88	9.9%	138	5.5%	56.8%
For Seasonal, Recreational, or Occasional Use	34	3.8%	81	3.2%	138.2%
For Migrant Workers	0	0.0%	0	.0%	%
Other Vacant	187	21.1%	847	33.8%	352.9%
Total	885	100.0%	2,508	100.0%	183.4%

Table 14.A.12**Households by Household Size**

14. City of Cleveland Heights

2000 & 2010 Census SF1 Data

Size	2000 Census		2010 Census		% Change 00-10
	Households	% of Total	Households	% of Total	
One Person	6,810	32.6%	7,198	36.1%	5.7%
Two Persons	6,658	31.8%	6,378	32.0%	-4.2%
Three Persons	3,323	15.9%	2,871	14.4%	-13.6%
Four Persons	2,323	11.1%	1,943	9.7%	-16.4%
Five Persons	1,061	5.1%	861	4.3%	-18.9%
Six Persons	436	2.1%	416	2.1%	-4.6%
Seven Persons or More	302	1.4%	290	1.5%	-4.0%
Total	20,913	100.0%	19,957	100.0%	-4.6%

Table 14.A.13
Household Type by Tenure
 14. City of Cleveland Heights
 2000 & 2010 Census SF1 Data

Household Type	2000 Census		2010 Census		% Change 00–10
	Households	% of Total	Households	% of Total	
Family Households	12,174	58.2%	10,834	54.3%	-11.0%
Married-Couple Family	8,622	70.8%	7,106	65.6%	-17.6%
Owner-Occupied	7,139	82.8%	5,826	82.0%	-18.4%
Renter-Occupied	1,483	17.2%	1,280	18.0%	-13.7%
Other Family	3,552	29.2%	3,728	34.4%	5.0%
Male Householder, No Spouse	598	16.8%	688	18.5%	15.1%
Owner-Occupied	423	70.7%	400	58.1%	-5.4%
Renter-Occupied	175	29.3%	288	41.9%	64.6%
Female Householder, No Spouse	2,954	83.2%	3,040	81.5%	2.9%
Owner-Occupied	1,768	59.9%	1,362	44.8%	-23.0%
Renter-Occupied	1,186	40.1%	1,678	55.2%	41.5%
Non-Family Households	8,739	41.8%	9,123	45.7%	4.4%
Owner-Occupied	3,659	41.9%	3,654	40.1%	-.1%
Renter-Occupied	5,080	58.1%	5,469	59.9%	7.7%
Total	20,913	100.0%	19,957	100.0%	-4.6%

Table 14.A.14
Group Quarters Population
 14. City of Cleveland Heights
 2000 & 2010 Census SF1 Data

Group Quarters Type	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Institutionalized					
Correctional Institutions	2	1.3%	0	.0%	-100.0%
Juvenile Facilities	.	.	0	.0%	.
Nursing Homes	155	98.7%	118	100.0%	-23.9%
Other Institutions	0	.0%	0	.0%	%
Total	157	100.0%	118	100.0%	-24.8%
Noninstitutionalized					
College Dormitories	0	.0%	534	86.1%	%
Military Quarters	0	.0%	0	.0%	%
Other Noninstitutional	104	100.0%	86	13.9%	-17.3%
Total	104	39.8%	620	84.0%	496.2%
Total Group Quarters Population	261	100.0%	738	100.0%	182.8%

Table 14.A.15
Overcrowding and Severe Overcrowding
 14. City of Cleveland Heights
 2000 Census SF3 & 2010 Five-Year ACS Data

Data Source	No Overcrowding		Overcrowding		Severe Overcrowding		Total
	Households	% of Total	Households	% of Total	Households	% of Total	
Owner							
2000 Census	12,887	99.2%	93	.7%	7	.1%	12,987
2010 ACS	11,437	99.1%	95	.8%	4	.0%	11,536
Renter							
2000 Census	7,860	98.7%	64	.8%	36	.5%	7,960
2010 ACS	7,980	99.7%	10	.1%	14	.2%	8,004
Total							
2000 Census	20,747	99.0%	157	.7%	43	.2%	20,947
2010 ACS	19,417	99.4%	105	.5%	18	.1%	19,540

Table 14.A.16
Households with Incomplete Plumbing Facilities
 14. City of Cleveland Heights
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Plumbing Facilities	20,862	19,442
Lacking Complete Plumbing Facilities	85	98
Total Households	20,947	19,540
Percent Lacking	.4%	.5%

Table 14.A.17
Households with Incomplete Kitchen Facilities
 14. City of Cleveland Heights
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Kitchen Facilities	20,620	19,186
Lacking Complete Kitchen Facilities	327	354
Total Households	20,947	19,540
Percent Lacking	1.6%	1.8%

Table 14.A.18
Cost Burden and Severe Cost Burden by Tenure
 14. City of Cleveland Heights
 2000 Census & 2010 Five-Year ACS Data

Data Source	Less Than 30%		31%-50%		Above 50%		Not Computed		Total
	Households	% of Total	Households	% of Total	Households	% of Total	Households	% of Total	
Owner With a Mortgage									
2000 Census	6,726	71.8%	1,680	17.9%	917	9.8%	45	.5%	9,368
2010 ACS	5,069	58.7%	1,967	22.8%	1,537	17.8%	69	.8%	8,642
Owner Without a Mortgage									
2000 Census	2,056	83.8%	220	9.0%	144	5.9%	33	1.3%	2,453
2010 ACS	2,177	75.2%	409	14.1%	297	10.3%	11	.4%	2,894
Renter									
2000 Census	4,565	57.3%	1,539	19.3%	1,450	18.2%	406	5.1%	7,960
2010 ACS	3,537	44.2%	1,518	19.0%	2,480	31.0%	469	5.9%	8,004
Total									
2000 Census	13,347	67.5%	3,439	17.4%	2,511	12.7%	484	2.4%	19,781
2010 ACS	10,783	55.2%	3,894	19.9%	4,314	22.1%	549	2.8%	19,540

Table 14.A.19
Median Housing Costs
 14. City of Cleveland Heights
 2000 Census SF3 & 2010 Five-Year ACS Data

Housing Cost	2000 Census	2010 ACS
Median Contract Rent	\$580	\$694
Median Home Value	\$109,500	\$143,000

B. BLS DATA

This section contains Bureau of Labor Statistics (BLS) data that address employment and income.

Table 14.B.1
Labor Force Statistics
 14. City of Cleveland Heights
 1990–2011 BLS Data

Year	Labor Force	Employment	Unemployment	Unemployment Rate	Statewide Unemployment Rate
1990	28,800	27,771	1,029	3.6%	5.7%
1991	28,109	26,917	1,192	4.2%	6.6%
1992	28,305	26,886	1,419	5.0%	7.4%
1993	28,658	27,291	1,367	4.8%	6.7%
1994	28,998	27,747	1,251	4.3%	5.6%
1995	29,128	28,135	993	3.4%	4.9%
1996	29,230	28,330	900	3.1%	5.0%
1997	29,583	28,711	872	2.9%	4.6%
1998	29,798	28,986	812	2.7%	4.3%
1999	30,008	29,184	824	2.7%	4.3%
2000	28,789	28,075	714	2.5%	4.0%
2001	28,626	27,842	784	2.7%	4.4%
2002	28,269	27,288	981	3.5%	5.7%
2003	28,151	26,859	1,292	4.6%	6.2%
2004	27,822	26,480	1,342	4.8%	6.1%
2005	27,438	26,191	1,247	4.5%	5.9%
2006	27,145	25,920	1,225	4.5%	5.4%
2007	27,014	25,722	1,292	4.8%	5.6%
2008	26,750	25,335	1,415	5.3%	6.5%
2009	25,812	24,140	1,672	6.5%	10.1%
2010	26,190	24,421	1,769	6.8%	10.0%
2011	26,438	24,745	1,693	6.4%	8.6%

C. HMDA DATA

The Home Mortgage Disclosure Act (HMDA) requires both depository and non-depository lenders to collect and publicly disclose information about housing-related loans and loan applications.⁶⁵ The information presented in this section presents detailed HMDA data, including denial rates and predatory lending including high annual percentage rate (APR) loans.

Table 14.C.1
Purpose of Loan by Year
 14. City of Cleveland Heights
 2004–2011 HMDA Data

Purpose	2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	1,585	2,086	2,138	1,325	789	748	637	486	9,794
Home Improvement	582	578	639	526	440	271	203	254	3,493
Refinancing	3,413	3,109	2,400	1,770	1,186	1,293	1,128	1,016	15,315
Total	5,580	5,773	5,177	3,621	2,415	2,312	1,968	1,756	28,602

Table 14.C.2
Occupancy Status for Home Purchase Loan Applications
 14. City of Cleveland Heights
 2004–2011 HMDA Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	Total
Owner-Occupied	1,332	1,676	1,673	1,056	689	702	605	454	8,187
Not Owner-Occupied	242	397	449	259	95	44	32	32	1,550
Not Applicable	11	13	16	10	5	2	0	0	57
Total	1,585	2,086	2,138	1,325	789	748	637	486	9,794

Table 14.C.3
Owner-Occupied Home Purchase Loan Applications by Loan Type
 14. City of Cleveland Heights
 2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Conventional	1,184	1,525	1,563	918	396	276	250	213	6,325
FHA - Insured	138	127	103	125	280	409	335	233	1,750
VA - Guaranteed	10	24	7	13	13	17	20	8	112
Rural Housing Service or Farm Service Agency	0	0	0	0	0	0	0	0	0
Total	1,332	1,676	1,673	1,056	689	702	605	454	8,187

⁶⁵ Data are considered “raw” because they contain entry errors and incomplete loan applications. Starting in 2004, the HMDA data made substantive changes in reporting. It modified the way it handled Hispanic data, loan interest rates, and the reporting of multifamily loan applications.

DENIAL RATES

Table 14.C.4
Loan Applications by Action Taken
 14. City of Cleveland Heights
 2004–2011 HMDA Data

Action	2004	2005	2006	2007	2008	2009	2010	2011	Total
Loan Originated	750	869	756	532	356	302	299	212	4,076
Application Approved but not Accepted	100	114	122	51	21	25	12	13	458
Application Denied	131	224	329	171	90	61	50	47	1,103
Application Withdrawn by Applicant	96	133	141	54	33	34	30	25	546
File Closed for Incompleteness	16	21	27	18	11	5	7	7	112
Loan Purchased by the Institution	239	311	298	230	178	274	207	150	1,887
Preapproval Request Denied	0	4	0	0	0	1	0	0	5
Preapproval Approved but not Accepted	0	0	0	0	0	0	0	0	0
Total	1,332	1,676	1,673	1,056	689	702	605	454	8,187
Denial Rate	14.9%	20.5%	30.3%	24.3%	20.2%	16.8%	14.3%	18.1%	21.3%

Table 14.C.5
Denial Rates by Gender of Applicant
 14. City of Cleveland Heights
 2004–2011 HMDA Data

Year	Male	Female	Not Available	Not Applicable	Average
2004	10.8%	18.8%	43.3%	%	14.9%
2005	18.5%	22.4%	27.7%	.0%	20.5%
2006	27.1%	34.4%	35.3%	%	30.3%
2007	18.5%	30.2%	33.9%	%	24.3%
2008	18.9%	21.8%	21.9%	.0%	20.2%
2009	15.9%	16.0%	29.2%	%	16.8%
2010	15.1%	13.7%	11.5%	%	14.3%
2011	13.1%	20.6%	40.0%	%	18.1%
Average	18.3%	24.3%	30.5%	.0%	21.3%

Table 14.C.6
Loan Applications by Selected Action Taken by Gender of Applicant
 14. City of Cleveland Heights
 2004–2011 HMDA Data

Gender		2004	2005	2006	2007	2008	2009	2010	2011	Total
Male	Originated	469	485	444	303	193	164	163	119	2,340
	Denied	57	110	165	69	45	31	29	18	524
	Denial Rate	10.8%	18.5%	27.1%	18.5%	18.9%	15.9%	15.1%	13.1%	18.3%
Female	Originated	264	349	290	192	136	121	113	81	1,546
	Denied	61	101	152	83	38	23	18	21	497
	Denial Rate	18.8%	22.4%	34.4%	30.2%	21.8%	16.0%	13.7%	20.6%	24.3%
Not Available	Originated	17	34	22	37	25	17	23	12	187
	Denied	13	13	12	19	7	7	3	8	82
	Denial Rate	43.3%	27.7%	35.3%	33.9%	21.9%	29.2%	11.5%	40.0%	30.5%
Not Applicable	Originated	0	1	0	0	2	0	0	0	3
	Denied	0	0	0	0	0	0	0	0	0
	Denial Rate	%	.0%	%	%	.0%	%	%	%	.0%
Total	Originated	750	869	756	532	356	302	299	212	4,076
	Denied	131	224	329	171	90	61	50	47	1,103
	Denial Rate	14.9%	20.5%	30.3%	24.3%	20.2%	16.8%	14.3%	18.1%	21.3%

Table 14.C.7
Denial Rates by Race/Ethnicity of Applicant
 14. City of Cleveland Heights
 2004–2011 HMDA Data

Race/Ethnicity	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	25.0%	.0%	%	50.0%	.0%	%	%	%	16.7%
Asian	4.3%	.0%	3.7%	11.1%	15.4%	25.0%	14.3%	.0%	7.9%
Black	27.4%	40.6%	51.5%	45.5%	40.3%	28.3%	24.3%	41.5%	41.1%
White	7.5%	9.4%	10.7%	10.8%	10.3%	9.3%	11.0%	9.7%	9.7%
Not Available	32.4%	22.9%	37.8%	31.3%	26.5%	32.4%	15.8%	27.3%	28.9%
Not Applicable	%	.0%	%	%	.0%	0%	0%	%	.0%
Average	14.9%	20.5%	30.3%	24.3%	20.2%	16.8%	14.3%	18.1%	21.3%
Non-Hispanic	12.9%	19.6%	29.6%	22.4%	20.4%	16.0%	15.3%	17.0%	20.5%
Hispanic	17.4%	12.5%	5.6%	25.0%	.0%	.0%	.0%	.0%	10.0%

Table 14.C.8
Loan Applications by Selected Action Taken by Race/Ethnicity of Applicant
 14. City of Cleveland Heights
 2004–2011 HMDA Data

Race		2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Originated	3	5	0	1	1	0	0	0	10
	Denied	1	0	0	1	0	0	0	0	2
	Denial Rate	25.0%	.0%	%	50.0%	.0%	%	%	%	16.7%
Asian	Originated	22	24	26	16	11	9	12	8	128
	Denied	1	0	1	2	2	3	2	0	11
	Denial Rate	4.3%	.0%	3.7%	11.1%	15.4%	25.0%	14.3%	.0%	7.9%
Black	Originated	170	208	229	122	71	66	53	31	950
	Denied	64	142	243	102	48	26	17	22	664
	Denial Rate	27.4%	40.6%	51.5%	45.5%	40.3%	28.3%	24.3%	41.5%	41.1%
White	Originated	505	547	450	338	235	204	202	149	2,630
	Denied	41	57	54	41	27	21	25	16	282
	Denial Rate	7.5%	9.4%	10.7%	10.8%	10.3%	9.3%	11.0%	9.7%	9.7%
Not Available	Originated	50	84	51	55	36	23	32	24	355
	Denied	24	25	31	25	13	11	6	9	144
	Denial Rate	32.4%	22.9%	37.8%	31.3%	26.5%	32.4%	15.8%	27.3%	28.9%
Not Applicable	Originated	0	1	0	0	2	0	0	0	3
	Denied	0	0	0	0	0	0	0	0	0
	Denial Rate	32.4%	22.9%	37.8%	31.3%	26.5%	32.4%	15.8%	27.3%	.0%
Total	Originated	750	869	756	532	356	302	299	212	4,076
	Denied	131	224	329	171	90	61	50	47	1,103
	Denial Rate	14.9%	20.5%	30.3%	24.3%	20.2%	16.8%	14.3%	18.1%	21.3%
Non-Hispanic	Originated	639	757	693	470	309	267	261	190	3,586
	Denied	95	185	291	136	79	51	47	39	923
	Denial Rate	12.9%	19.6%	29.6%	22.4%	20.4%	16.0%	15.3%	17.0%	20.5%
Hispanic	Originated	19	14	17	6	7	9	6	3	81
	Denied	4	2	1	2	0	0	0	0	9
	Denial Rate	17.4%	12.5%	5.6%	25.0%	.0%	.0%	.0%	.0%	10.0%

Table 14.C.9
Loan Applications by Reason for Denial
 14. City of Cleveland Heights
 2004–2011 HMDA Data

Denial Reason	2004	2005	2006	2007	2008	2009	2010	2011	Total
Debt-to-Income Ratio	17	29	40	24	17	13	18	16	174
Employment History	0	5	10	1	0	0	0	0	16
Credit History	23	36	58	27	16	18	9	9	196
Collateral	18	16	23	32	16	12	4	7	128
Insufficient Cash	0	4	2	6	6	3	1	0	22
Unverifiable Information	4	5	14	12	3	3	0	4	45
Credit Application Incomplete	13	18	14	11	4	4	7	5	76
Mortgage Insurance Denied	0	0	0	0	2	0	0	0	2
Other	33	61	56	33	9	5	9	2	208
Missing	23	50	112	25	17	3	2	4	236
Total	131	224	329	171	90	61	50	47	1,103

Table 14.C.10
Denial Rates by Income of Applicant
 14. City of Cleveland Heights
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	%	66.7%	50.0%	71.4%	100.0%	66.7%	100.0%	50.0%	70.4%
\$15,001–\$30,000	35.6%	35.0%	47.2%	39.6%	35.5%	24.3%	35.3%	52.0%	37.8%
\$30,001–\$45,000	23.2%	22.4%	34.2%	23.1%	24.8%	18.5%	11.4%	25.5%	24.2%
\$45,001–\$60,000	13.4%	23.8%	37.3%	30.6%	24.0%	19.0%	11.3%	12.5%	24.8%
\$60,001–\$75,000	11.3%	23.6%	33.1%	29.9%	24.4%	5.9%	6.7%	13.3%	21.9%
Above \$75,000	8.1%	12.5%	17.6%	15.3%	9.3%	13.3%	12.2%	8.8%	12.7%
Data Missing	8.3%	25.5%	29.2%	22.2%	.0%	25.0%	%	100.0%	22.6%
Total	14.9%	20.5%	30.3%	24.3%	20.2%	16.8%	14.3%	18.1%	21.3%

Table 14.C.11
Denial Rates of Loans by Race/Ethnicity and Income of Applicant
 14. City of Cleveland Heights
 2004–2011 HMDA Data

Race	<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	Above \$75K	Data Missing	Average
American Indian	%	.0%	.0%	33.3%	.0%	.0%	%	16.7%
Asian	%	22.2%	.0%	16.7%	.0%	8.2%	.0%	7.9%
Black	100.0%	47.4%	38.3%	40.6%	41.8%	38.3%	51.4%	41.1%
White	37.5%	23.0%	11.5%	9.8%	9.3%	7.3%	11.7%	9.7%
Not Available	40.0%	51.2%	32.0%	33.1%	30.9%	16.3%	41.7%	28.9%
Not Applicable	%	%	%	%	%	.0%	.0%	.0%
Average	70.4%	37.8%	24.2%	24.8%	21.9%	12.7%	22.6%	21.3%
Non-Hispanic Ethnicity	77.3%	36.6%	23.0%	23.6%	21.3%	12.4%	22.1%	20.5%
Hispanic (Ethnicity)	%	.0%	22.2%	21.1%	.0%	2.7%	.0%	10.0%

Table 14.C.12
Loan Applications by Reason for Denial by Race/Ethnicity of Applicant
 14. City of Cleveland Heights
 2004–2011 HMDA Data

Denial Reason	American Indian	Asian	Black	White	Not Available	Not Applicable	Total	Hispanic (Ethnicity)
Debt-to-Income Ratio	1	1	92	59	21	0	174	1
Employment History	0	0	10	4	2	0	16	0
Credit History	0	1	142	30	23	0	196	2
Collateral	0	2	57	47	22	0	128	2
Insufficient Cash	0	0	10	11	1	0	22	0
Unverifiable Information	0	1	25	12	7	0	45	0
Credit Application Incomplete	0	0	38	30	8	0	76	0
Mortgage Insurance Denied	0	0	0	2	0	0	2	0
Other	1	4	119	63	21	0	208	1
Missing	0	2	171	24	39	0	236	3
Total	2	11	664	282	144	0	1,103	9
% Missing	.0%	18.2%	25.8%	8.5%	27.1%	%	21.4%	33.3%

Table 14.C.13
Loan Applications by Income of Applicant: Originated and Denied
 14. City of Cleveland Heights
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Loan Originated	0	1	3	2	0	1	0	1	8
	Application Denied	0	2	3	5	3	2	3	1	19
	Denial Rate	%	66.7%	50.0%	71.4%	100.0%	66.7%	100.0%	50.0%	70.4%
\$15,001–\$30,000	Loan Originated	29	39	28	29	20	28	22	12	207
	Application Denied	16	21	25	19	11	9	12	13	126
	Denial Rate	35.6%	35.0%	47.2%	39.6%	35.5%	24.3%	35.3%	52.0%	37.8%
\$30,001–\$45,000	Loan Originated	169	170	146	113	85	66	78	41	868
	Application Denied	51	49	76	34	28	15	10	14	277
	Denial Rate	23.2%	22.4%	34.2%	23.1%	24.8%	18.5%	11.4%	25.5%	24.2%
\$45,001–\$60,000	Loan Originated	149	183	175	102	73	68	63	42	855
	Application Denied	23	57	104	45	23	16	8	6	282
	Denial Rate	13.4%	23.8%	37.3%	30.6%	24.0%	19.0%	11.3%	12.5%	24.8%
\$60,001–\$75,000	Loan Originated	133	120	99	61	31	32	28	13	517
	Application Denied	17	37	49	26	10	2	2	2	145
	Denial Rate	11.3%	23.6%	33.1%	29.9%	24.4%	5.9%	6.7%	13.3%	21.9%
Above \$75,000	Loan Originated	237	321	271	211	146	104	108	103	1,501
	Application Denied	21	46	58	38	15	16	15	10	219
	Denial Rate	8.1%	12.5%	17.6%	15.3%	9.3%	13.3%	12.2%	8.8%	12.7%
Data Missing	Loan Originated	33	35	34	14	1	3	0	0	120
	Application Denied	3	12	14	4	0	1	0	1	35
	Denial Rate	8.3%	25.5%	29.2%	22.2%	.0%	25.0%	%	100.0%	22.6%
Total	Loan Originated	750	869	756	532	356	302	299	212	4,076
	Application Denied	131	224	329	171	90	61	50	47	1,103
	Denial Rate	14.9%	20.5%	30.3%	24.3%	20.2%	16.8%	14.3%	18.1%	21.3%

Table 14.C.14
Loan Applications by Income and Race/Ethnicity of Applicant: Originated and Denied
 14. City of Cleveland Heights
 2004–2011 HMDA Data

Race		<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	> \$75K	Data Missing	Total
American Indian	Loan Originated	0	1	1	4	2	2	0	10
	Application Denied	0	0	0	2	0	0	0	2
	Denial Rate	%	.0%	.0%	33.3%	.0%	.0%	%	16.7%
Asian	Loan Originated	0	7	32	25	15	45	4	128
	Application Denied	0	2	0	5	0	4	0	11
	Denial Rate	%	22.2%	.0%	16.7%	.0%	8.2%	.0%	7.9%
Black	Loan Originated	0	81	296	269	131	156	17	950
	Application Denied	14	73	184	184	94	97	18	664
	Denial Rate	100.0%	47.4%	38.3%	40.6%	41.8%	38.3%	51.4%	41.1%
White	Loan Originated	5	97	471	478	331	1,157	91	2,630
	Application Denied	3	29	61	52	34	91	12	282
	Denial Rate	37.5%	23.0%	11.5%	9.8%	9.3%	7.3%	11.7%	9.7%
Not Available	Loan Originated	3	21	68	79	38	139	7	355
	Application Denied	2	22	32	39	17	27	5	144
	Denial Rate	40.0%	51.2%	32.0%	33.1%	30.9%	16.3%	41.7%	28.9%
Not Applicable	Loan Originated	0	0	0	0	0	2	1	3
	Application Denied	0	0	0	0	0	0	0	0
	Denial Rate	%	%	%	%	%	.0%	.0%	.0%
Total	Loan Originated	8	207	868	855	517	1,501	120	4,076
	Application Denied	19	126	277	282	145	219	35	1,103
	Denial Rate	70.4%	37.8%	24.2%	24.8%	21.9%	12.7%	22.6%	21.3%
Non-Hispanic Ethnicity	Loan Originated	5	180	770	756	455	1,314	106	3,586
	Application Denied	17	104	230	233	123	186	30	923
	Denial Rate	77.3%	36.6%	23.0%	23.6%	21.3%	12.4%	22.1%	20.5%
Hispanic (Ethnicity)	Loan Originated	0	2	14	15	13	36	1	81
	Application Denied	0	0	4	4	0	1	0	9
	Denial Rate	%	.0%	22.2%	21.1%	.0%	2.7%	.0%	10.0%

PREDATORY LENDING

Table 14.C.15
Originated Owner-Occupied Loans by HAL Status
 14. City of Cleveland Heights
 2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Other	656	623	523	455	333	280	298	211	3,379
HAL	94	246	233	77	23	22	1	1	697
Total	750	869	756	532	356	302	299	212	4,076
Percent HAL	12.5%	28.3%	30.8%	14.5%	6.5%	7.3%	.3%	.5%	17.1%

Table 14.C.16
Loans by Loan Purpose by HAL Status
 14. City of Cleveland Heights
 2004–2011 HMDA Data

Loan Purpose		2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	Other	656	623	523	455	333	280	298	211	3,379
	HAL	94	246	233	77	23	22	1	1	697
	Percent HAL	12.5%	28.3%	30.8%	14.5%	6.5%	7.3%	.3%	.5%	17.1%
Home Improvement	Other	199	202	208	170	116	65	65	91	1,116
	HAL	48	37	54	36	38	20	8	1	242
	Percent HAL	19.4%	15.5%	20.6%	17.5%	24.7%	23.5%	11.0%	1.1%	17.8%
Refinancing	Other	856	644	390	333	234	445	463	375	3,740
	HAL	206	328	239	115	39	22	1	3	953
	Percent HAL	19.4%	33.7%	38.0%	25.7%	14.3%	4.7%	.2%	.8%	20.3%
Total	Other	1,711	1,469	1,121	958	683	790	826	677	8,235
	HAL	348	611	526	228	23	22	1	1	1,892
	Percent HAL	16.9%	29.4%	31.9%	19.2%	12.8%	7.5%	1.2%	.7%	18.7%

Table 14.C.17
HALs Originated by Race of Borrower
 14. City of Cleveland Heights
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	0	3	0	1	1	0	0	0	5
Asian	1	3	2	1	0	0	0	0	7
Black	51	137	154	46	10	8	0	1	407
White	28	61	49	24	10	14	1	0	187
Not Available	14	42	28	5	2	0	0	0	91
Not Applicable	0	0	0	0	0	0	0	0	0
Total	94	246	233	77	23	22	1	1	697
Hispanic (Ethnicity)	4	5	5	0	0	0	0	0	14

Table 14.C.18
Rate of HALs Originated by Race/Ethnicity of Borrower
 14. City of Cleveland Heights
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	.0%	60.0%	%	100.0%	100.0%	%	%	%	50.0%
Asian	4.5%	12.5%	7.7%	6.3%	.0%	.0%	.0%	.0%	5.5%
Black	30.0%	65.9%	67.2%	37.7%	14.1%	12.1%	.0%	3.2%	42.8%
White	5.5%	11.2%	10.9%	7.1%	4.3%	6.9%	.5%	.0%	7.1%
Not Available	28.0%	50.0%	54.9%	9.1%	5.6%	.0%	.0%	.0%	25.6%
Not Applicable	%	.0%	%	%	.0%	%	%	%	0%
Average	12.5%	28.3%	30.8%	14.5%	6.5%	7.3%	0.3%	0.5%	17.1%
Non-Hispanic Ethnicity	11.0%	25.6%	29.4%	14.3%	6.5%	7.9%	.4%	.5%	16.1%
Hispanic (Ethnicity)	21.1%	35.7%	29.4%	.0%	.0%	.0%	.0%	.0%	17.3%

Table 14.C.19
Loans by HAL Status by Race/Ethnicity of Borrower
 14. City of Cleveland Heights
 2004–2011 HMDA Data

Race	Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Other	3	2	0	0	0	0	0	0	5
	HAL	0	3	0	1	1	0	0	0	5
	Percent HAL	.0%	60.0%	%	100.0%	100.0%	%	%	%	50.0%
Asian	Other	21	21	24	15	11	9	12	8	121
	HAL	1	3	2	1	0	0	0	0	7
	Percent HAL	4.5%	12.5%	7.7%	6.3%	.0%	.0%	.0%	.0%	5.5%
Black	Other	119	71	75	76	61	58	53	30	543
	HAL	51	137	154	46	10	8	0	1	407
	Percent HAL	30.0%	65.9%	67.2%	37.7%	14.1%	12.1%	.0%	3.2%	42.8%
White	Other	477	486	401	314	225	190	201	149	2,443
	HAL	28	61	49	24	10	14	1	0	187
	Percent HAL	5.5%	11.2%	10.9%	7.1%	4.3%	6.9%	0.5%	0.0%	7.1%
Not Available	Other	36	42	23	50	34	23	32	24	264
	HAL	14	42	28	5	2	0	0	0	91
	Percent HAL	28.0%	50.0%	54.9%	9.1%	5.6%	.0%	.0%	.0%	25.6%
Not Applicable	Other	0	1	0	0	2	0	0	0	3
	HAL	0	0	0	0	0	0	0	0	0
	Percent HAL	%	.0%	%	%	.0%	%	%	%	0.0%
Total	Other	656	623	523	455	333	280	298	211	3,379
	HAL	94	246	233	77	23	22	1	1	697
	Percent HAL	12.5%	28.3%	30.8%	14.5%	6.5%	7.3%	.3%	.5%	17.1%
Non-Hispanic Ethnicity	Other	569	563	489	403	289	246	260	189	3,008
	HAL	70	194	204	67	20	21	1	1	578
	Percent HAL	11.0%	25.6%	29.4%	14.3%	6.5%	7.9%	.4%	.5%	16.1%
Hispanic (Ethnicity)	Other	15	9	12	6	7	9	6	3	67
	HAL	4	5	5	0	0	0	0	0	14
	Percent HAL	21.1%	35.7%	29.4%	.0%	.0%	.0%	.0%	.0%	17.3%

Table 14.C.20
Rates of HALs by Income of Borrower
 14. City of Cleveland Heights
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Average
\$15,000 or Below	%	.0%	.0%	.0%	%	.0%	%	.0%	.0%
\$15,001–\$30,000	24.1%	35.9%	28.6%	3.4%	15.0%	17.9%	.0%	.0%	18.4%
\$30,001–\$45,000	20.7%	32.4%	30.8%	22.1%	11.8%	10.6%	.0%	2.4%	20.5%
\$45,001–\$60,000	16.8%	49.2%	42.9%	16.7%	6.8%	4.4%	1.6%	.0%	25.3%
\$60,001–\$75,000	10.5%	34.2%	43.4%	14.8%	9.7%	9.4%	.0%	.0%	21.9%
Above \$75,000	4.6%	12.8%	16.2%	10.9%	1.4%	3.8%	0.0%	.0%	8.3%
Data Missing	6.1%	14.3%	52.9%	14.3%	.0%	.0%	%	%	22.5%
Average	12.5%	28.3%	30.8%	14.5%	6.5%	7.3%	.3%	.5%	17.1%

Table 14.C.21
Loans by HAL Status by Income of Borrower
 14. City of Cleveland Heights
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Other	0	1	3	2	0	1	0	1	8
	HAL	0	0	0	0	0	0	0	0	0
	Percent HAL	%	.0%	.0%	.0%	%	.0%	%	.0%	.0%
\$15,001–\$30,000	Other	22	25	20	28	17	23	22	12	169
	HAL	7	14	8	1	3	5	0	0	38
	Percent HAL	24.1%	35.9%	28.6%	3.4%	15.0%	17.9%	.0%	.0%	18.4%
\$30,001–\$45,000	Other	134	115	101	88	75	59	78	40	690
	HAL	35	55	45	25	10	7	0	1	178
	Percent HAL	20.7%	32.4%	30.8%	22.1%	11.8%	10.6%	.0%	2.4%	20.5%
\$45,001–\$60,000	Other	124	93	100	85	68	65	62	42	639
	HAL	25	90	75	17	5	3	1	0	216
	Percent HAL	16.8%	49.2%	42.9%	16.7%	6.8%	4.4%	1.6%	.0%	25.3%
\$60,001–\$75,000	Other	119	79	56	52	28	29	28	13	404
	HAL	14	41	43	9	3	3	0	0	113
	Percent HAL	10.5%	34.2%	43.4%	14.8%	9.7%	9.4%	.0%	.0%	21.9%
Above \$75,000	Other	226	280	227	188	144	100	108	103	1,376
	HAL	11	41	44	23	2	4	0	0	125
	Percent HAL	4.6%	12.8%	16.2%	10.9%	1.4%	3.8%	.0%	.0%	8.3%
Data Missing	Other	31	30	16	12	1	3	0	0	93
	HAL	2	5	18	2	0	0	0	0	27
	Percent HAL	6.1%	14.3%	52.9%	14.3%	.0%	.0%	%	%	22.5%
Total	Other	656	623	523	455	333	280	298	211	3,379
	HAL	94	246	233	77	23	22	1	1	697
	Percent HAL	12.5%	28.3%	30.8%	14.5%	6.5%	7.3%	.3%	.5%	17.1%

D. CRA DATA

Additional data tables related to Community Reinvestment Act (CRA) data are presented in this section.

Table 14.D.1
Small Business Loans Originated: \$100,000 or Less by Tract MFI
 14. City of Cleveland Heights
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000		0	320	267		587
2001		11	306	286		603
2002		6	345	316		667
2003		21	456	289		766
2004		19	456	279		754
2005		23	485	308		816
2006		37	708	525		1,270
2007		33	830	568		1,431
2008		34	619	467		1,120
2009		10	235	211		456
2010		3	193	172		368
2011		10	256	180		446
Total	0	207	5,209	3,868	0	9,284
Loan Amount (\$1,000s)						
2000		0	3,614	2,639		6,253
2001		74	2,477	2,082		4,633
2002		66	3,395	3,386		6,847
2003		217	4,475	2,146		6,838
2004		82	4,250	2,526		6,858
2005		220	5,192	3,607		9,019
2006		278	6,571	4,336		11,185
2007		225	7,334	5,083		12,642
2008		143	5,452	3,910		9,505
2009		219	2,621	1,809		4,649
2010		25	2,443	1,620		4,088
2011		175	2,987	1,881		5,043
Total	0	1,724	50,811	35,025	0	87,560

Table 14.D.2
Small Business Loans Originated: \$100,001 to \$250,000 by Tract MFI
 14. City of Cleveland Heights
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000		0	9	5		14
2001		0	9	8		17
2002		0	10	6		16
2003		0	10	2		12
2004		0	9	5		14
2005		1	3	6		10
2006		0	6	5		11
2007		0	3	4		7
2008		0	8	5		13
2009		0	0	2		2
2010		0	9	2		11
2011		0	8	6		14
Total	0	1	84	56	0	141
Loan Amount (\$1,000s)						
2000		0	1,526	754		2,280
2001		0	1,380	1,426		2,806
2002		0	1,775	1,064		2,839
2003		0	1,652	350		2,002
2004		0	1,825	852		2,677
2005		138	507	1,076		1,721
2006		0	927	970		1,897
2007		0	545	751		1,296
2008		0	1,468	906		2,374
2009		0	0	266		266
2010		0	1,429	235		1,664
2011		0	1,159	950		2,109
Total	0	138	14,193	9,600	0	23,931

Table 14.D.3
Small Business Loans Originated: More than \$250,000 by Tract MFI
 14. City of Cleveland Heights
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000		1	2	3		6
2001		0	5	4		9
2002		0	6	6		12
2003		1	8	5		14
2004		0	13	6		19
2005		0	9	4		13
2006		0	5	4		9
2007		1	9	3		13
2008		1	1	2		4
2009		0	1	3		4
2010		0	5	8		13
2011		0	6	6		12
Total	0	4	70	54	0	128
Loan Amount (\$1,000s)						
2000		300	1,500	1,550		3,350
2001		0	2,356	1,665		4,021
2002		0	4,590	2,288		6,878
2003		264	4,273	2,872		7,409
2004		0	6,079	3,393		9,472
2005		0	4,304	2,662		6,966
2006		0	2,348	2,600		4,948
2007		596	4,648	1,080		6,324
2008		323	390	1,512		2,225
2009		0	325	1,538		1,863
2010		0	3,539	4,066		7,605
2011		0	3,269	2,405		5,674
Total	0	1,483	37,621	27,631	0	66,735

Table 14.D.4
Small Business Loans to Businesses with Gross Annual Revenues of Less Than \$1 Million by Tract MFI
 14. City of Cleveland Heights
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000		0	154	101		255
2001		5	116	126		247
2002		3	94	108		205
2003		6	181	99		286
2004		3	160	111		274
2005		16	247	179		442
2006		18	276	190		484
2007		8	355	208		571
2008		13	199	128		340
2009		5	78	78		161
2010		1	76	48		125
2011		6	133	72		211
Total	0	84	2,069	1,448	0	3,601
Loan Amount (\$1,000s)						
2000		0	5,052	2,737		7,789
2001		54	4,160	3,303		7,517
2002		57	6,014	3,322		9,393
2003		78	5,782	3,475		9,335
2004		17	5,705	1,958		7,680
2005		332	6,725	4,960		12,017
2006		227	5,807	3,909		9,943
2007		639	8,371	3,226		12,236
2008		58	2,479	2,436		4,973
2009		187	1,301	1,727		3,215
2010		5	4,652	1,815		6,472
2011		154	1,689	1,682		3,525
Total	0	1,808	57,737	34,550	0	94,095

E. COMPLAINT DATA

This section contains data regarding fair housing complaints, as provided by the U.S. Department of Housing and Urban Development (HUD) and the Ohio Civil Rights Commission (OCRC).

HUD COMPLAINTS

Table 14.E.1
Fair Housing Complaints by Basis
 14. City of Cleveland Heights
 2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color										
Disability		1	1	1	2					5
Family Status				1	1	13	5			20
National Origin					1		1			2
Race	3	3	1	1	3	1	3			15
Religion		1								1
Sex					1		1			2
Total Bases	3	5	2	3	8	14	10			45
Total Complaints	3	4	1	2	7	14	10			41

Table 14.E.2
Fair Housing Complaints by Issue
 14. City of Cleveland Heights
 2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Discriminatory refusal to rent		1		2	2		3			8
Discriminatory advertising, statements, and notices							5			5
Discriminatory terms, conditions, privileges, or services and facilities	1	1			1		1			4
Discrimination in terms, conditions or privileges relating to rental		2	1			1				4
Discriminatory refusal to rent and negotiate for rental		1					2			3
Refusing to provide insurance	2									2
Otherwise deny or make housing available							2			2
Failure to permit reasonable modification					2					2
Discriminatory advertisement - rental		1			1	13				15
Discriminatory refusal to sell and negotiate for sale							1			1
False denial or representation of availability - rental					1					1
Discrimination in making of loans							1			1
Other discriminatory acts							1			1
Discriminatory acts under Section 818 (coercion, etc.)					1					1
Failure to make reasonable accommodation			1							1
Total Issues	3	6	2	2	8	14	16	0	0	51
Total Complaints	3	4	1	2	7	14	10			41

Table 14.E.3
Fair Housing Complaints by Closure Status
 14. City of Cleveland Heights
 2004–2012 HUD Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Administrative Closure	1	1	1		1		2			6
Cause (FHAP)				1	1	11	5			18
Conciliated / Settled	1	2			2	2	2			9
No Cause	1	1		1	3	1	1			8
Total Complaints	3	4	1	2	7	14	10			41

HUD Complaints Found With Cause

Table 14.E.4
Fair Housing Complaints Found With Cause by Basis
 14. City of Cleveland Heights
 2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability		1		1						2
Family Status				1	1	12	5			19
Race	1	1			1	1	2			6
Sex					1					1
Total Bases	1	2		2	3	13	7			28
Total Complaints	1	2		1	3	13	7			27

Table 14.E.5
Fair Housing Complaints Found With Cause by Issue
 14. City of Cleveland Heights
 2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Discriminatory refusal to rent				1	2		3			6
Discriminatory advertising, statements, and notices							5			5
Discrimination in terms, conditions or privileges relating to rental		1				1				2
Discriminatory advertisement - rental					1	12				13
Discriminatory refusal to rent and negotiate for rental							1			1
Discrimination in making of loans							1			1
Discriminatory terms, conditions, privileges, or services and facilities		1								1
Refusing to provide insurance	1									1
Otherwise deny or make housing available							1			1
Other discriminatory acts							1			1
Discriminatory acts under Section 818 (coercion, etc.)					1					1
Total Issues	1	2	0	1	4	13	12	0	0	33
Total Complaints	1	2		1	3	13	7			27

OHIO CIVIL RIGHTS COMMISSION COMPLAINTS

Table 14.E.6
Fair Housing Complaints by Basis
 14. City of Cleveland Heights
 2004–2012 OCRRC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability		1	1	1						3
Family Status				1	1	3				5
Gender					1					1
National Origin							1			1
Race	2	1								4
Other								1		1
Total Bases	2	2	1	2	3	3	1	1	0	15
Total Complaints	2	2	1	1	3	3	1	1		14

Table 14.E.7
Fair Housing Complaints by Issue
 14. City of Cleveland Heights
 2004–2012 OCRRC Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Advertising						3				3
Exclusion	1				1					2
Harassment		1								1
Other	2			1	1	2	1	1		8
Reasonable Accommodation			1							1
Terms and Conditions		2			1					3
Total Issues	3	3	1	1	3	5	1	1	0	18
Total Complaints	2	2	1	1	3	3	1	1		14

Table 14.E.8
Fair Housing Complaints by Closure Status
 14. City of Cleveland Heights
 2004–2012 OCRC Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
CP Withdrawal – No Benefit	1						1			2
No Cause Finding Issued	1				2					3
Settlement With Benefits			1			3		1		5
Successful Conciliation					1					1
Withdrawal With Benefits		2		1						3
Total Complaints	2	2	1	1	3	3	1	1	0	14

THE HOUSING RESEARCH AND ADVOCACY CENTER

Table 14.E.9
Fair Housing Complaints by Basis
 14 City of Cleveland Heights
 2004–2012 HRAC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Familial Status							2	1		3
N.A.								1		1
Race					1					1
Sex					1					1
Sexual Orientation					1					1
Total Bases	0	0	0	0	3	0	2	2	0	7
Total Complaints					2		2	2		6

Table 14.E.10
Fair Housing Complaints by Issue
 14 City of Cleveland Heights
 2004–2012 HRAC Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Rental					2		2	2		6
Total	0	0	0	0	2	0	2	2	0	6
Total Complaints					2		2	2		6

Table 14.E.11
Fair Housing Complaints by Action Taken
 14 City of Cleveland Heights
 2004–2012 HRAC Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Referred to OCRC					1		2			3
Fair Housing Info Given					1			1		2
HRAC Conducted Test					1					1
Referred to City								1		1
Total	0	0	0	0	3	0	2	2	0	7
Total Complaints					2		2	2		6

F. FAIR HOUSING SURVEY FOR HOUSING STAKEHOLDERS DATA

No responses were received from Cleveland Heights in the 2012–2013 Fair Housing Survey for Housing Stakeholders.

G. LAND USE PLANNING SURVEY DATA

This section contains data regarding the potential effects of local land use and housing policies on fair housing choice, as gathered from the Land Use Planning Interview.

ENTITLEMENT COMMUNITY LAND USE PLANNING INTERVIEWS

In the Region's 18 entitlement cities and four entitlement counties, public sector policies were evaluated through individual telephone interviews that followed the structure of the 2012–2013 Fair Housing Survey for Government Officials, an online survey for nonentitlement community planning staff. This allowed for more thorough answers to the same key questions about public sector policies.

The appropriate planning and community development staff person or persons at these communities was solicited from members of the Progress Review Team, representing each entitlement community.

Table 14.G.1
Housing Development
 14. City of Cleveland Heights
 2012 Land Use Planning Interview Data

Question: Does your jurisdiction...	Response
Housing Development	
Have a definition for the term "dwelling unit"?	Yes
Encourage or allocate funding for affordable housing development?	Yes
Have any potential barriers to the development of low- to moderate- income housing?	No
Occupancy Standards	
Have a definition for the term "family"?	Yes
Have any residential occupancy standards or limits?	Yes
Allow the mixed-use housing development?	Yes
Have any potential barriers to the development of mixed-use housing?	Don't Know
Special Needs Housing	
Have a definition for the term "disability"?	Yes
Have any particular standards/policies regarding accessible housing?	No
Have any special process for persons with disabilities to request variances for accessible housing?	No
Have any special standards for the development of senior housing?	No
Distinguish senior citizen housing from other residential uses in any way?	Yes
Address group housing, or have any special policies for any other special needs housing?	Yes
Fair Housing Policies	
Have a fair housing ordinance, policy, or regulation?	Yes
Participate in any activities or practices for "affirmatively furthering fair housing"?	Yes

H. IMPEDIMENTS

The 2013 *Northeast Ohio Regional Analysis of Impediments to Fair Housing Choice* uncovered several potential issues regarding fair housing in the City of Cleveland Heights. Identification of these items as probable impediments to fair housing choice was based on HUD's definition of impediments as actions, omissions, or decisions that restrict housing choice due to protected class status or actions, omissions, or decisions that have this effect. The identified impediments are supported by evidence uncovered during the Regional AI process, with impediments of higher need being those identified in multiple sources.

These probable impediments in the entirety of the Northeast Ohio Region are presented in **Volumes I and II** of the Regional AI. They are accompanied by suggested actions that jurisdictions in the Region may implement in order to alleviate or eliminate these impediments, and are accompanied by measurable objectives. The goal of these actions and measurable objectives is to assist these agencies in offering greater housing choice for all citizens of the Northeast Ohio Region.

The following list presents the private and public sector impediments found in the City of Cleveland Heights.

PRIVATE SECTOR

1. *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 City 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.

2. *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.

3. *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 City 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.

4. *Impediment:* Denial of home purchase loans

Denial of home purchase loans was supported as an impediment to fair housing choice in the City 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.

5. *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 City. 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.

6. *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

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. The City of Cleveland Heights seems to also have this particular problem.

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 in Cleveland Heights. 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 other local units of government as co-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 throughout 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 and is likely still at work in Cleveland Heights.

Suggestion: Acknowledge that some legacy decisions, made long ago, may not have resulted in a more integrated City. 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, including Cleveland Heights. 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 and the responses received from the City of Cleveland Heights.

Suggestion: Construct a regional 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.

IMPEDIMENTS MATRIX

The matrix on the following page includes the impediment, data source, or sources that indicated its existence, protected classes most affected, and ranking of need for action. Level of need for action was determined based on the number of data sources that identified each impediment.

Table 14.H.1
Impediments Matrix
 14. City of Cleveland Heights
 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 ⁶⁶		
Private Sector												
1	Discriminatory terms, conditions, privileges, or facilities relating to rental		X				X	X			All	H
2	Failure to make reasonable accommodations or modifications		X				X	X			Disabled persons	H
3	Preferences stated in advertisements for rental housing							X			All	L
4	Denial of home purchase loans				X			X			Black and Hispanic persons	M
5	Predatory lending in the home purchase market				X			X	X		Black and Hispanic persons	H
6	Failure to comply with accessibility requirements in construction of housing units							X			Disabled persons	L
Public Sector												
1	Lack of sufficient fair housing policies or practices by several units of local government							X			All	L
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	All	M
5	Decisions regarding definitions of "family," "dwelling unit," and related terms									X	Disabled persons, families	L
6	Lack of inclusionary policies							X		X	All	M

⁶⁶ 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.

15. CITY OF EAST CLEVELAND

A. CENSUS BUREAU DATA

This section contains additional data from the U.S. Census Bureau.

Table 15.A.1

Population by Age

15. City of East Cleveland
2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Under 5	2,001	7.4%	1,144	6.4%	-42.8%
5 to 19	6,812	25.0%	3,407	19.1%	-50.0%
20 to 24	1,727	6.3%	1,165	6.5%	-32.5%
25 to 34	3,400	12.5%	1,870	10.5%	-45.0%
35 to 54	7,153	26.3%	4,454	25.0%	-37.7%
55 to 64	2,508	9.2%	2,457	13.8%	-2.0%
65 or Older	3,616	13.3%	3,346	18.8%	-7.5%
Total	27,217	100.0%	17,843	100.0%	-34.4%

Table 15.A.2

Elderly Population by Age

15. City of East Cleveland
2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
65 to 66	514	14.2%	340	10.2%	-33.9%
67 to 69	617	17.1%	523	15.6%	-15.2%
70 to 74	989	27.4%	870	26.0%	-12.0%
75 to 79	669	18.5%	655	19.6%	-2.1%
80 to 84	414	11.4%	526	15.7%	27.1%
85 or Older	413	11.4%	432	12.9%	4.6%
Total	3,616	100.0%	3,346	100.0%	-7.5%

Table 15.A.3

Population by Race and Ethnicity

15. City of East Cleveland
2000 & 2010 Census SF1 Data

Race	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
White	1,240	4.6%	817	4.6%	-34.1%
Black	25,418	93.4%	16,638	93.2%	-34.5%
American Indian	59	.2%	40	.2%	-32.2%
Asian	61	.2%	40	.2%	-34.4%
Native Hawaiian/ Pacific Islander	4	.0%	0	.0%	-100.0%
Other	45	.2%	37	.2%	-17.8%
Two or More Races	390	1.4%	271	1.5%	-30.5%
Total	27,217	100.0%	17,843	100.0%	-34.4%
Non-Hispanic	27,010	99.2%	17,664	99.0%	-34.6%
Hispanic	207	.8%	179	1.0%	-13.5%

Table 15.A.4**Households by Income**

15. City of East Cleveland

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	4,273	38.1%	3,313	38.1%
\$15,000 to \$19,999	1,212	10.8%	826	9.5%
\$20,000 to \$24,999	1,001	8.9%	726	8.3%
\$25,000 to \$34,999	1,627	14.5%	1,133	13.0%
\$35,000 to \$49,999	1,364	12.2%	1,249	14.3%
\$50,000 to \$74,999	1,006	9.0%	889	10.2%
\$75,000 to \$99,999	447	4.0%	247	2.8%
\$100,000 or More	292	2.6%	321	3.7%
Total	11,222	100.0%	8,704	100.0%

Table 15.A.5**Poverty by Age**

15. City of East Cleveland

2000 Census SF3 & 2010 Five-Year ACS Data

Age	2000 Census		2010 Five-Year ACS	
	Persons in Poverty	% of Total	Persons in Poverty	% of Total
Under 6	1,157	13.6%	959	13.4%
6 to 17	2,430	28.5%	1,856	26.0%
18 to 64	4,178	49.0%	3,544	49.7%
65 or Older	754	8.9%	772	10.8%
Total	8,519	100.0%	7,131	100.0%
Poverty Rate	32.0%	.	37.4%	.

Table 15.A.6**Households by Year Home Built**

15. City of East Cleveland

2000 Census SF3 & 2010 Five-Year ACS Data

Year Built	2000 Census		2010 Five-Year ACS	
	Households	% of Total	Households	% of Total
1939 or Earlier	4,625	41.3%	4,850	55.7%
1940 to 1949	2,277	20.3%	1,228	14.1%
1950 to 1959	1,636	14.6%	921	10.6%
1960 to 1969	1,504	13.4%	738	8.5%
1970 to 1979	885	7.9%	630	7.2%
1980 to 1989	215	1.9%	132	1.5%
1990 to 1999	68	.6%	71	.8%
2000 to 2004	.	.	42	.5%
2005 or Later	.	.	92	1.1%
Total	11,210	100.0%	8,704	100.0%

Table 15.A.7**Housing Units by Type**

15. City of East Cleveland

2000 Census SF3 & 2010 Five-Year ACS Data

Unit Type	2000 Census		2010 Five-Year ACS	
	Units	% of Total	Units	% of Total
Single-Family	5,735	42.5%	5,862	44.0%
Duplex	2,027	15.0%	1,885	14.2%
Tri- or Four-Plex	920	6.8%	795	6.0%
Apartment	4,780	35.4%	4,728	35.5%
Mobile Home	16	.1%	0	.0%
Boat, RV, Van, Etc.	13	.1%	43	.3%
Total	13,491	100.0%	13,313	100.0%

Table 15.A.8**Housing Units by Tenure**

15. City of East Cleveland

2000 & 2010 Census SF1 Data

Tenure	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
Occupied Housing Units	11,210	83.1%	8,286	66.2%	-26.1%
Owner-Occupied	3,984	35.5%	2,783	33.6%	-30.1%
Renter-Occupied	7,226	64.5%	5,503	66.4%	-23.8%
Vacant Housing Units	2,281	16.9%	4,237	33.8%	85.8%
Total Housing Units	13,491	100.0%	12,523	100.0%	-7.2%

Table 15.A.9**Disposition of Vacant Housing Units**

15. City of East Cleveland

2000 & 2010 Census SF1 Data

Disposition	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
For Rent	1,314	57.6%	1,583	37.4%	20.5%
For Sale	149	6.5%	367	8.7%	146.3%
Rented or Sold, Not Occupied	129	5.7%	153	3.6%	18.6%
For Seasonal, Recreational, or Occasional Use	13	.6%	4	.1%	-69.2%
For Migrant Workers	0	0.0%	1	.0%	%
Other Vacant	676	29.6%	2,129	50.2%	214.9%
Total	2,281	100.0%	4,237	100.0%	85.8%

Table 15.A.10**Households by Household Size**

15. City of East Cleveland

2000 & 2010 Census SF1 Data

Size	2000 Census		2010 Census		% Change 00-10
	Households	% of Total	Households	% of Total	
One Person	4,265	38.0%	3,829	46.2%	-10.2%
Two Persons	2,893	25.8%	2,152	26.0%	-25.6%
Three Persons	1,723	15.4%	1,101	13.3%	-36.1%
Four Persons	1,160	10.3%	566	6.8%	-51.2%
Five Persons	606	5.4%	334	4.0%	-44.9%
Six Persons	310	2.8%	150	1.8%	-51.6%
Seven Persons or More	253	2.3%	154	1.9%	-39.1%
Total	11,210	100.0%	8,286	100.0%	-26.1%

Table 15.A.11
Household Type by Tenure
 15. City of East Cleveland
 2000 & 2010 Census SF1 Data

Household Type	2000 Census		2010 Census		% Change 00–10
	Households	% of Total	Households	% of Total	
Family Households	6,419	57.3%	4,043	48.8%	-37.0%
Married-Couple Family	2,380	37.1%	1,367	33.8%	-42.6%
Owner-Occupied	1,483	62.3%	831	60.8%	-44.0%
Renter-Occupied	897	37.7%	536	39.2%	-40.2%
Other Family	4,039	62.9%	2,676	66.2%	-33.7%
Male Householder, No Spouse	641	15.9%	485	18.1%	-24.3%
Owner-Occupied	272	42.4%	191	39.4%	-29.8%
Renter-Occupied	369	57.6%	294	60.6%	-20.3%
Female Householder, No Spouse	3,398	84.1%	2,191	81.9%	-35.5%
Owner-Occupied	1,065	31.3%	731	33.4%	-31.4%
Renter-Occupied	2,333	68.7%	1,460	66.6%	-37.4%
Non-Family Households	4,791	42.7%	4,243	51.2%	-11.4%
Owner-Occupied	1,164	24.3%	1,030	24.3%	-11.5%
Renter-Occupied	3,627	75.7%	3,213	75.7%	-11.4%
Total	11,210	100.0%	8,286	100.0%	-26.1%

Table 15.A.12
Group Quarters Population
 15. City of East Cleveland
 2000 & 2010 Census SF1 Data

Group Quarters Type	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Institutionalized					
Correctional Institutions	31	9.1%	49	16.1%	58.1%
Juvenile Facilities	.	.	25	8.2%	.
Nursing Homes	290	85.5%	231	75.7%	-20.3%
Other Institutions	18	5.3%	0	.0%	-100.0%
Total	339	100.0%	305	100.0%	-10.0%
Noninstitutionalized					
College Dormitories	0	.0%	0	.0%	%
Military Quarters	0	.0%	0	.0%	%
Other Noninstitutional	110	100.0%	61	100.0%	-44.5%
Total	110	24.5%	61	16.7%	-44.5%
Total Group Quarters Population	449	100.0%	366	100.0%	-18.5%

Table 15.A.13
Overcrowding and Severe Overcrowding
 15. City of East Cleveland
 2000 Census SF3 & 2010 Five-Year ACS Data

Data Source	No Overcrowding		Overcrowding		Severe Overcrowding		Total
	Households	% of Total	Households	% of Total	Households	% of Total	
Owner							
2000 Census	3,967	99.6%	9	.2%	5	.1%	3,981
2010 ACS	3,043	99.6%	12	.4%	0	.0%	3,055
Renter							
2000 Census	7,029	97.2%	115	1.6%	85	1.2%	7,229
2010 ACS	5,503	97.4%	96	1.7%	50	.9%	5,649
Total							
2000 Census	10,996	98.1%	124	1.1%	90	.8%	11,210
2010 ACS	8,546	98.2%	108	1.2%	50	.6%	8,704

Table 15.A.14
Households with Incomplete Plumbing Facilities
 15. City of East Cleveland
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Plumbing Facilities	11,106	8,603
Lacking Complete Plumbing Facilities	104	101
Total Households	11,210	8,704
Percent Lacking	.9%	1.2%

Table 15.A.15
Households with Incomplete Kitchen Facilities
 15. City of East Cleveland
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Kitchen Facilities	11,099	8,577
Lacking Complete Kitchen Facilities	111	127
Total Households	11,210	8,704
Percent Lacking	1.0%	1.5%

Table 15.A.16
Cost Burden and Severe Cost Burden by Tenure
 15. City of East Cleveland
 2000 Census & 2010 Five-Year ACS Data

Data Source	Less Than 30%		31%-50%		Above 50%		Not Computed		Total
	Households	% of Total	Households	% of Total	Households	% of Total	Households	% of Total	
Owner With a Mortgage									
2000 Census	1,132	51.1%	512	23.1%	549	24.8%	22	1.0%	2,215
2010 ACS	944	45.0%	593	28.3%	535	25.5%	27	1.3%	2,099
Owner Without a Mortgage									
2000 Census	664	74.3%	89	10.0%	78	8.7%	63	7.0%	894
2010 ACS	644	67.4%	187	19.6%	106	11.1%	19	2.0%	956
Renter									
2000 Census	3,324	46.1%	1,492	20.7%	1,784	24.7%	614	8.5%	7,214
2010 ACS	2,058	36.4%	1,095	19.4%	1,987	35.2%	509	9.0%	5,649
Total									
2000 Census	5,120	49.6%	2,093	20.3%	2,411	23.4%	699	6.8%	10,323
2010 ACS	3,646	41.9%	1,875	21.5%	2,628	30.2%	555	6.4%	8,704

Table 15.A.17
Median Housing Costs
 15. City of East Cleveland
 2000 Census SF3 & 2010 Five-Year ACS Data

Housing Cost	2000 Census	2010 ACS
Median Contract Rent	\$397	\$496
Median Home Value	\$67,700	\$78,200

B. BLS DATA

This section contains Bureau of Labor Statistics (BLS) data that address employment and income.

Table 15.B.1
Labor Force Statistics
 15. City of East Cleveland
 1990–2011 BLS Data

Year	Labor Force	Employment	Unemployment	Unemployment Rate	Statewide Unemployment Rate
1990	14,468	12,682	1,786	12.3%	5.7%
1991	14,361	12,292	2,069	14.4%	6.6%
1992	14,742	12,278	2,464	16.7%	7.4%
1993	14,836	12,463	2,373	16.0%	6.7%
1994	14,843	12,671	2,172	14.6%	5.6%
1995	14,572	12,848	1,724	11.8%	4.9%
1996	14,499	12,937	1,562	10.8%	5.0%
1997	14,625	13,111	1,514	10.4%	4.6%
1998	14,646	13,237	1,409	9.6%	4.3%
1999	14,758	13,327	1,431	9.7%	4.3%
2000	11,042	9,870	1,172	10.6%	4.0%
2001	11,072	9,787	1,285	11.6%	4.4%
2002	11,202	9,593	1,609	14.4%	5.7%
2003	10,209	9,311	898	8.8%	6.2%
2004	10,009	9,138	871	8.7%	6.1%
2005	9,882	9,077	805	8.1%	5.9%
2006	9,717	8,984	733	7.5%	5.4%
2007	9,702	8,913	789	8.1%	5.6%
2008	9,592	8,773	819	8.5%	6.5%
2009	9,307	8,371	936	10.1%	10.1%
2010	6,988	6,118	870	12.4%	10.0%
2011	6,935	6,198	737	10.6%	8.6%

C. HMDA DATA

The Home Mortgage Disclosure Act (HMDA) requires both depository and non-depository lenders to collect and publicly disclose information about housing-related loans and loan applications.⁶⁷ The information presented in this section presents detailed HMDA data, including denial rates and predatory lending including high annual percentage rate (APR) loans.

Table 15.C.1
Purpose of Loan by Year
15. City of East Cleveland
2004–2011 HMDA Data

Purpose	2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	670	811	922	363	99	44	23	21	2,953
Home Improvement	247	173	220	191	152	95	63	65	1,206
Refinancing	1,340	1,302	917	536	270	149	119	86	4,719
Total	2,257	2,286	2,059	1,090	521	288	205	172	8,878

Table 15.C.2
Occupancy Status for Home Purchase Loan Applications
15. City of East Cleveland
2004–2011 HMDA Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	Total
Owner-Occupied	424	483	576	232	75	41	20	18	1,869
Not Owner-Occupied	238	325	338	124	21	3	1	3	1,053
Not Applicable	8	3	8	7	3	0	2	0	31
Total	670	811	922	363	99	44	23	21	2,953

Table 15.C.3
Owner-Occupied Home Purchase Loan Applications by Loan Type
15. City of East Cleveland
2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Conventional	386	461	548	207	31	7	2	3	1,645
FHA - Insured	37	20	26	24	40	31	18	14	210
VA - Guaranteed	1	2	2	1	4	3	0	1	14
Rural Housing Service or Farm Service Agency	0	0	0	0	0	0	0	0	0
Total	424	483	576	232	75	41	20	18	1,869

⁶⁷ Data are considered “raw” because they contain entry errors and incomplete loan applications. Starting in 2004, the HMDA data made substantive changes in reporting. It modified the way it handled Hispanic data, loan interest rates, and the reporting of multifamily loan applications.

DENIAL RATES

Table 15.C.4
Loan Applications by Action Taken
 15. City of East Cleveland
 2004–2011 HMDA Data

Action	2004	2005	2006	2007	2008	2009	2010	2011	Total
Loan Originated	153	174	144	65	14	11	8	4	573
Application Approved but not Accepted	76	38	61	24	6	2	1	0	208
Application Denied	89	124	200	76	22	6	3	4	524
Application Withdrawn by Applicant	42	64	68	19	6	2	2	1	204
File Closed for Incompleteness	7	14	10	8	7	0	0	0	46
Loan Purchased by the Institution	57	68	92	40	19	20	6	9	311
Preapproval Request Denied	0	1	1	0	1	0	0	0	3
Preapproval Approved but not Accepted	0	0	0	0	0	0	0	0	0
Total	424	483	576	232	75	41	20	18	1,869
Denial Rate	36.8%	41.6%	58.1%	53.9%	61.1%	35.3%	27.3%	50.0%	47.8%

Table 15.C.5
Denial Rates by Gender of Applicant
 15. City of East Cleveland
 2004–2011 HMDA Data

Year	Male	Female	Not Available	Not Applicable	Average
2004	39.0%	29.4%	81.3%	%	36.8%
2005	45.8%	36.2%	66.7%	%	41.6%
2006	55.1%	61.2%	58.3%	%	58.1%
2007	54.5%	50.7%	83.3%	%	53.9%
2008	55.0%	66.7%	100.0%	%	61.1%
2009	37.5%	33.3%	%	%	35.3%
2010	.0%	37.5%	.0%	%	27.3%
2011	100.0%	40.0%	.0%	%	50.0%
Average	49.1%	44.6%	69.2%	%	47.8%

Table 15.C.6
Loan Applications by Selected Action Taken by Gender of Applicant
 15. City of East Cleveland
 2004–2011 HMDA Data

Gender		2004	2005	2006	2007	2008	2009	2010	2011	Total
Male	Originated	61	65	75	30	9	5	2	0	247
	Denied	39	55	92	36	11	3	0	2	238
	Denial Rate	39.0%	45.8%	55.1%	54.5%	55.0%	37.5%	.0%	100.0%	49.1%
Female	Originated	89	104	64	34	5	6	5	3	310
	Denied	37	59	101	35	10	3	3	2	250
	Denial Rate	29.4%	36.2%	61.2%	50.7%	66.7%	33.3%	37.5%	40.0%	44.6%
Not Available	Originated	3	5	5	1	0	0	1	1	16
	Denied	13	10	7	5	1	0	0	0	36
	Denial Rate	81.3%	66.7%	58.3%	83.3%	100.0%	%	.0%	.0%	69.2%
Not Applicable	Originated	0	0	0	0	0	0	0	0	0
	Denied	0	0	0	0	0	0	0	0	0
	Denial Rate	%	%	%	%	%	%	%	%	%
Total	Originated	153	174	144	65	14	11	8	4	573
	Denied	89	124	200	76	22	6	3	4	524
	Denial Rate	36.8%	41.6%	58.1%	53.9%	61.1%	35.3%	27.3%	50.0%	47.8%

Table 15.C.7
Denial Rates by Race/Ethnicity of Applicant
 15. City of East Cleveland
 2004–2011 HMDA Data

Race/Ethnicity	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	100.0%	100.0%	100.0%	100.0%	%	%	%	%	100.0%
Asian	%	%	%	.0%	%	%	%	%	.0%
Black	31.7%	39.5%	57.5%	50.0%	59.3%	33.3%	33.3%	80.0%	46.2%
White	15.6%	48.6%	55.6%	52.9%	57.1%	100.0%	%	%	43.0%
Not Available	73.2%	45.0%	64.5%	91.7%	100.0%	.0%	.0%	.0%	61.4%
Not Applicable	.0%	%	%	%	%	0%	0%	%	.0%
Average	36.8%	41.6%	58.1%	53.9%	61.1%	35.3%	27.3%	50.0%	47.8%
Non-Hispanic	29.2%	39.2%	57.2%	49.6%	58.8%	37.5%	30.0%	66.7%	45.5%
Hispanic	60.0%	100.0%	%	.0%	%	%	%	%	57.1%

Table 15.C.8
Loan Applications by Selected Action Taken by Race/Ethnicity of Applicant
 15. City of East Cleveland
 2004–2011 HMDA Data

Race		2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Originated	0	0	0	0	0	0	0	0	0
	Denied	1	1	1	1	0	0	0	0	4
	Denial Rate	100.0%	100.0%	100.0%	100.0%	%	%	%	%	100.0%
Asian	Originated	0	0	0	1	0	0	0	0	1
	Denied	0	0	0	0	0	0	0	0	0
	Denial Rate	%	%	%	.0%	%	%	%	%	.0%
Black	Originated	114	133	121	55	11	10	6	1	451
	Denied	53	87	164	55	16	5	3	4	387
	Denial Rate	31.7%	39.5%	57.5%	50.0%	59.3%	33.3%	33.3%	80.0%	46.2%
White	Originated	27	19	12	8	3	0	0	0	69
	Denied	5	18	15	9	4	1	0	0	52
	Denial Rate	15.6%	48.6%	55.6%	52.9%	57.1%	100.0%	%	%	43.0%
Not Available	Originated	11	22	11	1	0	1	2	3	51
	Denied	30	18	20	11	2	0	0	0	81
	Denial Rate	73.2%	45.0%	64.5%	91.7%	100.0%	.0%	.0%	.0%	61.4%
Not Applicable	Originated	1	0	0	0	0	0	0	0	1
	Denied	0	0	0	0	0	0	0	0	0
	Denial Rate	73.2%	45.0%	64.5%	91.7%	100.0%	.0%	.0%	.0%	.0%
Total	Originated	153	174	144	65	14	11	8	4	573
	Denied	89	124	200	76	22	6	3	4	524
	Denial Rate	36.8%	41.6%	58.1%	53.9%	61.1%	35.3%	27.3%	50.0%	47.8%
Non-Hispanic	Originated	121	152	131	61	14	10	7	2	498
	Denied	50	98	175	60	20	6	3	4	416
	Denial Rate	29.2%	39.2%	57.2%	49.6%	58.8%	37.5%	30.0%	66.7%	45.5%
Hispanic	Originated	2	0	0	1	0	0	0	0	3
	Denied	3	1	0	0	0	0	0	0	4
	Denial Rate	60.0%	100.0%	%	.0%	%	%	%	%	57.1%

Table 15.C.9
Loan Applications by Reason for Denial
 15. City of East Cleveland
 2004–2011 HMDA Data

Denial Reason	2004	2005	2006	2007	2008	2009	2010	2011	Total
Debt-to-Income Ratio	14	6	13	4	5	1	0	0	43
Employment History	2	1	0	0	0	0	0	0	3
Credit History	12	17	36	26	5	1	0	1	98
Collateral	8	10	23	8	4	1	1	1	56
Insufficient Cash	2	1	0	0	0	0	1	0	4
Unverifiable Information	2	1	10	5	1	0	0	0	19
Credit Application Incomplete	5	3	9	4	1	0	0	0	22
Mortgage Insurance Denied	0	0	0	1	0	0	0	0	1
Other	19	49	39	14	3	0	1	0	125
Missing	25	36	70	14	3	3	0	2	153
Total	89	124	200	76	22	6	3	4	524

Table 15.C.10
Denial Rates by Income of Applicant
 15. City of East Cleveland
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	50.0%	100.0%	66.7%	100.0%	50.0%	%	%	%	73.3%
\$15,001–\$30,000	40.9%	50.6%	64.0%	56.3%	77.8%	33.3%	33.3%	100.0%	53.8%
\$30,001–\$45,000	29.4%	42.1%	54.7%	47.8%	53.3%	40.0%	33.3%	.0%	45.0%
\$45,001–\$60,000	41.7%	31.1%	61.7%	60.0%	75.0%	.0%	.0%	.0%	45.5%
\$60,001–\$75,000	18.2%	38.9%	38.7%	54.5%	50.0%	.0%	33.3%	.0%	37.5%
Above \$75,000	40.9%	15.4%	70.6%	46.2%	50.0%	100.0%	%	100.0%	42.2%
Data Missing	62.5%	87.5%	77.8%	50.0%	%	%	%	%	74.1%
Total	36.8%	41.6%	58.1%	53.9%	61.1%	35.3%	27.3%	50.0%	47.8%

Table 15.C.11
Denial Rates of Loans by Race/Ethnicity and Income of Applicant
 15. City of East Cleveland
 2004–2011 HMDA Data

Race	<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	Above \$75K	Data Missing	Average
American Indian	%	100.0%	100.0%	100.0%	%	%	%	100.0%
Asian	%	%	%	.0%	%	%	%	.0%
Black	88.9%	50.9%	42.3%	43.4%	41.1%	52.1%	64.3%	46.2%
White	50.0%	50.0%	54.8%	47.4%	26.7%	22.7%	50.0%	43.0%
Not Available	50.0%	73.0%	60.6%	53.6%	37.5%	38.5%	100.0%	61.4%
Not Applicable	%	%	%	%	.0%	%	%	.0%
Average	73.3%	53.8%	45.0%	45.5%	37.5%	42.2%	74.1%	47.8%
Non-Hispanic Ethnicity	83.3%	51.3%	41.9%	44.4%	36.8%	43.5%	63.2%	45.5%
Hispanic (Ethnicity)	%	50.0%	100.0%	.0%	%	100.0%	%	57.1%

Table 15.C.12
Loan Applications by Reason for Denial by Race/Ethnicity of Applicant
 15. City of East Cleveland
 2004–2011 HMDA Data

Denial Reason	American Indian	Asian	Black	White	Not Available	Not Applicable	Total	Hispanic (Ethnicity)
Debt-to-Income Ratio	0	0	30	5	8	0	43	0
Employment History	1	0	2	0	0	0	3	0
Credit History	1	0	75	14	8	0	98	1
Collateral	0	0	47	4	5	0	56	0
Insufficient Cash	0	0	4	0	0	0	4	0
Unverifiable Information	0	0	15	4	0	0	19	0
Credit Application Incomplete	0	0	17	2	3	0	22	0
Mortgage Insurance Denied	0	0	1	0	0	0	1	0
Other	1	0	86	17	21	0	125	2
Missing	1	0	110	6	36	0	153	1
Total	4	0	387	52	81	0	524	4
% Missing	25.0%	%	28.4%	11.5%	44.4%	%	29.2%	25.0%

Table 15.C.13
Loan Applications by Income of Applicant: Originated and Denied
 15. City of East Cleveland
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Loan Originated	1	0	2	0	1	0	0	0	4
	Application Denied	1	3	4	2	1	0	0	0	11
	Denial Rate	50.0%	100.0%	66.7%	100.0%	50.0%	%	%	%	73.3%
\$15,001–\$30,000	Loan Originated	39	43	31	14	2	4	2	0	135
	Application Denied	27	44	55	18	7	2	1	3	157
	Denial Rate	40.9%	50.6%	64.0%	56.3%	77.8%	33.3%	33.3%	100.0%	53.8%
\$30,001–\$45,000	Loan Originated	60	55	67	24	7	3	2	1	219
	Application Denied	25	40	81	22	8	2	1	0	179
	Denial Rate	29.4%	42.1%	54.7%	47.8%	53.3%	40.0%	33.3%	.0%	45.0%
\$45,001–\$60,000	Loan Originated	28	42	18	14	1	3	2	2	110
	Application Denied	20	19	29	21	3	0	0	0	92
	Denial Rate	41.7%	31.1%	61.7%	60.0%	75.0%	.0%	.0%	.0%	45.5%
\$60,001–\$75,000	Loan Originated	9	11	19	5	2	1	2	1	50
	Application Denied	2	7	12	6	2	0	1	0	30
	Denial Rate	18.2%	38.9%	38.7%	54.5%	50.0%	.0%	33.3%	.0%	37.5%
Above \$75,000	Loan Originated	13	22	5	7	1	0	0	0	48
	Application Denied	9	4	12	6	1	2	0	1	35
	Denial Rate	40.9%	15.4%	70.6%	46.2%	50.0%	100.0%	%	100.0%	42.2%
Data Missing	Loan Originated	3	1	2	1	0	0	0	0	7
	Application Denied	5	7	7	1	0	0	0	0	20
	Denial Rate	62.5%	87.5%	77.8%	50.0%	%	%	%	%	74.1%
Total	Loan Originated	153	174	144	65	14	11	8	4	573
	Application Denied	89	124	200	76	22	6	3	4	524
	Denial Rate	36.8%	41.6%	58.1%	53.9%	61.1%	35.3%	27.3%	50.0%	47.8%

Table 15.C.14
Loan Applications by Income and Race/Ethnicity of Applicant: Originated and Denied
 15. City of East Cleveland
 2004–2011 HMDA Data

Race		<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	> \$75K	Data Missing	Total
American Indian	Loan Originated	0	0	0	0	0	0	0	0
	Application Denied	0	1	1	2	0	0	0	4
	Denial Rate	%	100.0%	100.0%	100.0%	%	%	%	100.0%
Asian	Loan Originated	0	0	0	1	0	0	0	1
	Application Denied	0	0	0	0	0	0	0	0
	Denial Rate	%	%	%	.0%	%	%	%	.0%
Black	Loan Originated	1	111	192	86	33	23	5	451
	Application Denied	8	115	141	66	23	25	9	387
	Denial Rate	88.9%	50.9%	42.3%	43.4%	41.1%	52.1%	64.3%	46.2%
White	Loan Originated	1	14	14	10	11	17	2	69
	Application Denied	1	14	17	9	4	5	2	52
	Denial Rate	50.0%	50.0%	54.8%	47.4%	26.7%	22.7%	50.0%	43.0%
Not Available	Loan Originated	2	10	13	13	5	8	0	51
	Application Denied	2	27	20	15	3	5	9	81
	Denial Rate	50.0%	73.0%	60.6%	53.6%	37.5%	38.5%	100.0%	61.4%
Not Applicable	Loan Originated	0	0	0	0	1	0	0	1
	Application Denied	0	0	0	0	0	0	0	0
	Denial Rate	%	%	%	%	.0%	%	%	.0%
Total	Loan Originated	4	135	219	110	50	48	7	573
	Application Denied	11	157	179	92	30	35	20	524
	Denial Rate	73.3%	53.8%	45.0%	45.5%	37.5%	42.2%	74.1%	47.8%
Non-Hispanic Ethnicity	Loan Originated	2	115	198	94	43	39	7	498
	Application Denied	10	121	143	75	25	30	12	416
	Denial Rate	83.3%	51.3%	41.9%	44.4%	36.8%	43.5%	63.2%	45.5%
Hispanic (Ethnicity)	Loan Originated	0	2	0	1	0	0	0	3
	Application Denied	0	2	1	0	0	1	0	4
	Denial Rate	%	50.0%	100.0%	.0%	%	100.0%	%	57.1%

PREDATORY LENDING

Table 15.C.15
Originated Owner-Occupied Loans by HAL Status
 15. City of East Cleveland
 2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Other	68	51	29	34	10	10	8	4	214
HAL	85	123	115	31	4	1	0	0	359
Total	153	174	144	65	14	11	8	4	573
Percent HAL	55.6%	70.7%	79.9%	47.7%	28.6%	9.1%	.0%	.0%	62.7%

Table 15.C.16
Loans by Loan Purpose by HAL Status
 15. City of East Cleveland
 2004–2011 HMDA Data

Loan Purpose		2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	Other	68	51	29	34	10	10	8	4	214
	HAL	85	123	115	31	4	1	0	0	359
	Percent HAL	55.6%	70.7%	79.9%	47.7%	28.6%	9.1%	.0%	.0%	62.7%
Home Improvement	Other	39	24	28	26	27	12	6	11	173
	HAL	16	28	18	15	9	1	1	1	89
	Percent HAL	29.1%	53.8%	39.1%	36.6%	25.0%	7.7%	14.3%	8.3%	34.0%
Refinancing	Other	145	98	57	39	19	22	18	14	412
	HAL	126	130	92	28	17	4	0	2	399
	Percent HAL	46.5%	57.0%	61.7%	41.8%	47.2%	15.4%	.0%	12.5%	49.2%
Total	Other	252	173	114	99	56	44	32	29	799
	HAL	227	281	225	74	4	1	0	0	847
	Percent HAL	47.4%	61.9%	66.4%	42.8%	34.9%	12.0%	3.0%	9.4%	51.5%

Table 15.C.17
HALs Originated by Race of Borrower
 15. City of East Cleveland
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	0	0	0	0	0	0	0	0	0
Asian	0	0	0	0	0	0	0	0	0
Black	59	93	102	27	4	1	0	0	286
White	19	13	4	4	0	0	0	0	40
Not Available	6	17	9	0	0	0	0	0	32
Not Applicable	1	0	0	0	0	0	0	0	1
Total	85	123	115	31	4	1	0	0	359
Hispanic (Ethnicity)	0	0	0	0	0	0	0	0	0

Table 15.C.18
Rate of HALs Originated by Race/Ethnicity of Borrower
 15. City of East Cleveland
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	%	%	%	%	%	%	%	%	%
Asian	%	%	%	.0%	%	%	%	%	.0%
Black	51.8%	69.9%	84.3%	49.1%	36.4%	10.0%	.0%	.0%	63.4%
White	70.4%	68.4%	33.3%	50.0%	.0%	%	%	%	58.0%
Not Available	54.5%	77.3%	81.8%	.0%	%	.0%	.0%	.0%	62.7%
Not Applicable	100.0%	%	%	%	%	%	%	%	100%
Average	55.6%	70.7%	79.9%	47.7%	28.6%	9.1%	0.0%	0.0%	62.7%
Non-Hispanic Ethnicity	57.0%	71.1%	80.9%	47.5%	28.6%	10.0%	%	%	%
Hispanic (Ethnicity)	.0%	%	%	.0%	%	%	%	%	.0%

Table 15.C.19
Loans by HAL Status by Race/Ethnicity of Borrower
 15. City of East Cleveland
 2004–2011 HMDA Data

Race	Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Other	0	0	0	0	0	0	0	0	0
	HAL	0	0	0	0	0	0	0	0	0
	Percent HAL	%	%	%	%	%	%	%	%	%
Asian	Other	0	0	0	1	0	0	0	0	1
	HAL	0	0	0	0	0	0	0	0	0
	Percent HAL	%	%	%	.0%	%	%	%	%	.0%
Black	Other	55	40	19	28	7	9	6	1	165
	HAL	59	93	102	27	4	1	0	0	286
	Percent HAL	51.8%	69.9%	84.3%	49.1%	36.4%	10.0%	.0%	.0%	63.4%
White	Other	8	6	8	4	3	0	0	0	29
	HAL	19	13	4	4	0	0	0	0	40
	Percent HAL	70.4%	68.4%	33.3%	50.0%	.0%	%	0%	0%	58.0%
Not Available	Other	5	5	2	1	0	1	2	3	19
	HAL	6	17	9	0	0	0	0	0	32
	Percent HAL	54.5%	77.3%	81.8%	.0%	%	.0%	.0%	.0%	62.7%
Not Applicable	Other	0	0	0	0	0	0	0	0	0
	HAL	1	0	0	0	0	0	0	0	1
	Percent HAL	100.0%	%	%	%	%	%	%	%	100.0%
Total	Other	68	51	29	34	10	10	8	4	214
	HAL	85	123	115	31	4	1	0	0	359
	Percent HAL	55.6%	70.7%	79.9%	47.7%	28.6%	9.1%	.0%	.0%	62.7%
Non-Hispanic Ethnicity	Other	52	44	25	32	10	9	7	2	181
	HAL	69	108	106	29	4	1			
	Percent HAL	57.0%	71.1%	80.9%	47.5%	28.6%	10.0%	%	%	%
Hispanic (Ethnicity)	Other	2	0	0	1	0	0	0	0	3
	HAL	0	0	0	0	0	0	0	0	0
	Percent HAL	.0%	%	%	.0%	%	%	%	%	.0%

Table 15.C.20
Rates of HALs by Income of Borrower
 15. City of East Cleveland
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Average
\$15,000 or Below	.0%	%	.0%	%	.0%	%	%	%	.0%
\$15,001–\$30,000	51.3%	67.4%	87.1%	64.3%	100.0%	.0%	.0%	%	64.4%
\$30,001–\$45,000	58.3%	83.6%	92.5%	37.5%	28.6%	33.3%	.0%	.0%	70.8%
\$45,001–\$60,000	71.4%	73.8%	77.8%	64.3%	.0%	.0%	.0%	.0%	67.3%
\$60,001–\$75,000	77.8%	72.7%	42.1%	20.0%	.0%	.0%	.0%	.0%	48.0%
Above \$75,000	23.1%	36.4%	40.0%	28.6%	.0%	%	0%	%	31.3%
Data Missing	.0%	100.0%	100.0%	100.0%	%	%	%	%	57.1%
Average	55.6%	70.7%	79.9%	47.7%	28.6%	9.1%	.0%	.0%	62.7%

Table 15.C.21
Loans by HAL Status by Income of Borrower
 15. City of East Cleveland
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Other	1	0	2	0	1	0	0	0	4
	HAL	0	0	0	0	0	0	0	0	0
	Percent HAL	.0%	%	.0%	%	.0%	%	%	%	.0%
\$15,001–\$30,000	Other	19	14	4	5	0	4	2	0	48
	HAL	20	29	27	9	2	0	0	0	87
	Percent HAL	51.3%	67.4%	87.1%	64.3%	100.0%	.0%	.0%	%	64.4%
\$30,001–\$45,000	Other	25	9	5	15	5	2	2	1	64
	HAL	35	46	62	9	2	1	0	0	155
	Percent HAL	58.3%	83.6%	92.5%	37.5%	28.6%	33.3%	.0%	.0%	70.8%
\$45,001 – \$60,000	Other	8	11	4	5	1	3	2	2	36
	HAL	20	31	14	9	0	0	0	0	74
	Percent HAL	71.4%	73.8%	77.8%	64.3%	.0%	.0%	.0%	.0%	67.3%
\$60,001–\$75,000	Other	2	3	11	4	2	1	2	1	26
	HAL	7	8	8	1	0	0	0	0	24
	Percent HAL	77.8%	72.7%	42.1%	20.0%	.0%	.0%	.0%	.0%	48.0%
Above \$75,000	Other	10	14	3	5	1	0	0	0	33
	HAL	3	8	2	2	0	0	0	0	15
	Percent HAL	23.1%	36.4%	40.0%	28.6%	.0%	%	%	%	31.3%
Data Missing	Other	3	0	0	0	0	0	0	0	3
	HAL	0	1	2	1	0	0	0	0	4
	Percent HAL	.0%	100.0%	100.0%	100.0%	%	%	%	%	57.1%
Total	Other	68	51	29	34	10	10	8	4	214
	HAL	85	123	115	31	4	1	0	0	359
	Percent HAL	55.6%	70.7%	79.9%	47.7%	28.6%	9.1%	.0%	.0%	62.7%

D. CRA DATA

Additional data tables related to Community Reinvestment Act (CRA) data are presented in this section.

Table 15.D.1
Small Business Loans Originated: \$100,000 or Less by Tract MFI
 15. City of East Cleveland
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	76	76				152
2001	62	91				153
2002	78	87				165
2003	66	88				154
2004	68	102				170
2005	83	90				173
2006	106	146				252
2007	100	154				254
2008	74	109				183
2009	23	43				66
2010	29	32				61
2011	41	39				80
Total	806	1,057	0	0	0	1,863
Loan Amount (\$1,000s)						
2000	880	642				1,522
2001	608	593				1,201
2002	792	599				1,391
2003	676	664				1,340
2004	485	768				1,253
2005	652	919				1,571
2006	1,034	1,296				2,330
2007	805	1,134				1,939
2008	503	858				1,361
2009	265	379				644
2010	340	337				677
2011	154	374				528
Total	7,194	8,563	0	0	0	15,757

Table 15.D.2
Small Business Loans Originated: \$100,001 to \$250,000 by Tract MFI
 15. City of East Cleveland
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	0	0				0
2001	0	3				3
2002	2	3				5
2003	1	3				4
2004	2	1				3
2005	1	1				2
2006	1	1				2
2007	0	2				2
2008	1	1				2
2009	0	0				0
2010	0	1				1
2011	0	1				1
Total	8	17	0	0	0	25
Loan Amount (\$1,000s)						
2000	0	0				0
2001	0	486				486
2002	336	556				892
2003	120	475				595
2004	288	175				463
2005	200	135				335
2006	105	141				246
2007	0	285				285
2008	250	200				450
2009	0	0				0
2010	0	106				106
2011	0	102				102
Total	1,299	2,661	0	0	0	3,960

Table 15.D.3
Small Business Loans Originated: More than \$250,000 by Tract MFI
 15. City of East Cleveland
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	2	0				2
2001	3	1				4
2002	2	1				3
2003	0	4				4
2004	0	3				3
2005	2	1				3
2006	0	0				0
2007	0	1				1
2008	0	0				0
2009	1	1				2
2010	0	0				0
2011	0	0				0
Total	10	12	0	0	0	22
Loan Amount (\$1,000s)						
2000	1,800	0				1,800
2001	1,142	500				1,642
2002	765	336				1,101
2003	0	1,713				1,713
2004	0	2,005				2,005
2005	605	430				1,035
2006	0	0				0
2007	0	575				575
2008	0	0				0
2009	500	600				1,100
2010	0	0				0
2011	0	0				0
Total	4,812	6,159	0	0	0	10,971

Table 15.D.4
Small Business Loans to Businesses with Gross Annual Revenues of Less Than \$1 Million by Tract MFI
 15. City of East Cleveland
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	29	23				52
2001	24	28				52
2002	20	22				42
2003	23	21				44
2004	16	18				34
2005	40	37				77
2006	38	62				100
2007	35	61				96
2008	28	39				67
2009	9	14				23
2010	11	13				24
2011	18	19				37
Total	291	357	0	0	0	648
Loan Amount (\$1,000s)						
2000	497	392				889
2001	468	606				1,074
2002	960	916				1,876
2003	562	1,795				2,357
2004	342	304				646
2005	900	1,061				1,961
2006	622	750				1,372
2007	334	815				1,149
2008	497	409				906
2009	179	220				399
2010	195	203				398
2011	114	193				307
Total	5,670	7,664	0	0	0	13,334

E. COMPLAINT DATA

This section contains data regarding fair housing complaints, as provided by the U.S. Department of Housing and Urban Development (HUD) and the Ohio Civil Rights Commission (OCRC).

HUD COMPLAINTS

Table 15.E.1
Fair Housing Complaints by Basis
15. City of East Cleveland
2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability		1	1							2
Race	2	1							1	4
Total Bases	2	2	1						1	6
Total Complaints	2	2	1						1	6

Table 15.E.2
Fair Housing Complaints by Issue
15. City of East Cleveland
2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Discriminatory refusal to rent		2								2
Discriminatory financing (includes real estate transactions)									1	1
Discrimination in the terms or conditions for making loans			1							1
Redlining - insurance			1							1
Other discriminatory acts			1							1
Using ordinances to discriminate in zoning and land use				1						1
Total Issues	3	2	1	0	0	0	0	0	1	7
Total Complaints	2	2	1						1	6

Table 15.E.3
Fair Housing Complaints by Closure Status
15. City of East Cleveland
2004–2012 HUD Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Conciliated / Settled			1							1
No Cause	2	2								4
Open									1	1
Total Complaints	2	2	1						1	6

HUD Complaints Found With Cause

Table 15.E.4
Fair Housing Complaints Found With Cause by Basis
15. City of East Cleveland
2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability			1							1
Total Bases			1							1
Total Complaints			1							1

Table 15.E.5
Fair Housing Complaints Found With Cause by Issue
 15. City of East Cleveland
 2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Using ordinances to discriminate in zoning and land use			1							1
Total Issues	0	0	1	0	0	0	0	0	0	1
Total Complaints			1							1

OHIO CIVIL RIGHTS COMMISSION COMPLAINTS

Table 15.E.6
Fair Housing Complaints by Basis
 15. City of East Cleveland
 2004–2012 OCRRC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color		1								1
Disability		1								1
Gender		1								1
Race		1								1
Total Bases	0	4	0	0	0	0	0	0	0	4
Total Complaints		1								1

Table 15.E.7
Fair Housing Complaints by Issue
 15. City of East Cleveland
 2004–2012 OCRRC Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Exclusion		1								1
Other		1								1
Terms and Conditions		1								1
Total Issues	0	3	0	0	0	0	0	0	0	3
Total Complaints		1								1

Table 15.E.8
Fair Housing Complaints by Closure Status
 15. City of East Cleveland
 2004–2012 OCRRC Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
No Cause Finding Issued		1								1
Total Complaints	0	1	0	0	0	0	0	0	0	1

THE HOUSING RESEARCH AND ADVOCACY CENTER

Table 15.E.9
Fair Housing Complaints by Basis

15 City of East Cleveland
2004–2012 HRAC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability			1		3	1	1		1	7
Familial Status							1			1
Race			1							1
Sex							1			1
Total Bases	0	0	2	0	3	1	3	0	1	10
Total Complaints			2		3	1	3		1	10

Table 15.E.10
Fair Housing Complaints by Issue

15 City of East Cleveland
2004–2012 HRAC Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Rental			1		3	1	3		1	9
Other			1							1
Total	0	0	2	0	3	1	3	0	1	10
Total Complaints			2		3	1	3		1	10

Table 15.E.11
Fair Housing Complaints by Action Taken

15 City of East Cleveland
2004–2012 HRAC Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Fair Housing Info Given			2		1	1	1		1	6
Reasonable Accommodation					2					2
Referred to OCRC							1			1
Missing action							1			1
Total	0	0	2	0	3	1	3	0	1	10
Total Complaints			2		3	1	3		1	10

F. FAIR HOUSING SURVEY FOR HOUSING STAKEHOLDERS DATA

No responses were received from East Cleveland in the 2012–2013 Fair Housing Survey for Housing Stakeholders.

G. LAND USE PLANNING SURVEY DATA

This section contains data regarding the potential effects of local land use and housing policies on fair housing choice, as gathered from the Land Use Planning Interview.

ENTITLEMENT COMMUNITY LAND USE PLANNING INTERVIEWS

In the Region's 18 entitlement cities and four entitlement counties, public sector policies were evaluated through individual telephone interviews that followed the structure of the 2012–2013 Fair Housing Survey for Government Officials, an online survey for nonentitlement community planning staff. This allowed for more thorough answers to the same key questions about public sector policies.

The appropriate planning and community development staff person or persons at these communities was solicited from members of the Progress Review Team, representing each entitlement community.

Table 15.G.1
Housing Development
 15. City of East Cleveland
 2012 Land Use Planning Interview Data

Question: Does your jurisdiction...	Response
Housing Development	
Have a definition for the term "dwelling unit"?	Yes
Encourage or allocate funding for affordable housing development?	Yes
Have any potential barriers to the development of low- to moderate- income housing?	No
Occupancy Standards	
Have a definition for the term "family"?	Yes
Have any residential occupancy standards or limits?	Don't know
Allow the mixed-use housing development?	Yes
Have any potential barriers to the development of mixed-use housing?	Yes
Special Needs Housing	
Have a definition for the term "disability"?	Yes
Have any particular standards/policies regarding accessible housing?	No
Have any special process for persons with disabilities to request variances for accessible housing?	Don't know
Have any special standards for the development of senior housing?	No
Distinguish senior citizen housing from other residential uses in any way?	Don't know
Address group housing, or have any special policies for any other special needs housing?	No
Fair Housing Policies	
Have a fair housing ordinance, policy, or regulation?	Yes
Participate in any activities or practices for "affirmatively furthering fair housing"?	Don't know

H. IMPEDIMENTS

The 2013 *Northeast Ohio Regional Analysis of Impediments to Fair Housing Choice* uncovered several potential issues regarding fair housing in the City of East Cleveland. Identification of these items as probable impediments to fair housing choice was based on HUD's definition of impediments as actions, omissions, or decisions that restrict housing choice due to protected class status or actions, omissions, or decisions that have this effect. The identified impediments are supported by evidence uncovered during the Regional AI process, with impediments of higher need being those identified in multiple sources.

These probable impediments in the entirety of the Northeast Ohio Region are presented in **Volumes I and II** of the Regional AI. They are accompanied by suggested actions that jurisdictions in the Region may implement in order to alleviate or eliminate these impediments, and are accompanied by measurable objectives. The goal of these actions

and measureable objectives is to assist these agencies in offering greater housing choice for all citizens of the Northeast Ohio Region.

The following list presents the private and public sector impediments found in the City of East Cleveland.

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 in the City of East Cleveland.

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 in East Cleveland. 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 other local units of government as co-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 for East Cleveland.

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 in East Cleveland.

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 and was found to be in East Cleveland too.

Suggestion: Construct a regional 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 and it exists in East Cleveland.

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.

IMPEDIMENTS MATRIX

The matrix on the following page includes the impediment, data source, or sources that indicated its existence, protected classes most affected, and ranking of need for action. Level of need for action was determined based on the number of data sources that identified each impediment.

Table 15.H.1
Impediments Matrix
 15. City of East Cleveland
 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 ⁶⁸		
Private Sector												
1	Denial of available housing units in the rental markets		X				X	X			Black and Hispanic persons	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			Disabled persons	L
Public Sector												
1	Lack of sufficient fair housing policies or practices by several units of local government							X			All	L
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	All	M
5	Decisions regarding definitions of "family," "dwelling unit," and related terms									X	Disabled persons, families	L
6	Lack of inclusionary policies							X		X	All	M

⁶⁸ 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.

16. CITY OF EUCLID

A. CENSUS BUREAU DATA

This section contains additional data from the U.S. Census Bureau.

Table 16.A.1

Population by Age

16. City of Euclid

2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Under 5	3,327	6.3%	2,859	5.8%	-14.1%
5 to 19	9,452	17.9%	9,590	19.6%	1.5%
20 to 24	2,598	4.9%	2,613	5.3%	.6%
25 to 34	7,640	14.5%	5,666	11.6%	-25.8%
35 to 54	15,228	28.9%	14,007	28.6%	-8.0%
55 to 64	4,360	8.3%	6,389	13.1%	46.5%
65 or Older	10,112	19.2%	7,796	15.9%	-22.9%
Total	52,717	100.0%	48,920	100.0%	-7.2%

Table 16.A.2

Elderly Population by Age

16. City of Euclid

2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
65 to 66	754	7.5%	819	10.5%	8.6%
67 to 69	1,261	12.5%	1,166	15.0%	-7.5%
70 to 74	2,382	23.6%	1,611	20.7%	-32.4%
75 to 79	2,354	23.3%	1,404	18.0%	-40.4%
80 to 84	1,843	18.2%	1,310	16.8%	-28.9%
85 or Older	1,518	15.0%	1,486	19.1%	-2.1%
Total	10,112	100.0%	7,796	100.0%	-22.9%

Table 16.A.3

Population by Race and Ethnicity

16. City of Euclid

2000 & 2010 Census SF1 Data

Race	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
White	34,985	66.4%	21,417	43.8%	-38.8%
Black	16,116	30.6%	25,751	52.6%	59.8%
American Indian	62	.1%	102	.2%	64.5%
Asian	493	.9%	359	.7%	-27.2%
Native Hawaiian/ Pacific Islander	13	.0%	4	.0%	-69.2%
Other	184	.3%	169	.3%	-8.2%
Two or More Races	864	1.6%	1,118	2.3%	29.4%
Total	52,717	100.0%	48,920	100.0%	-7.2%
Non-Hispanic	52,113	98.9%	48,151	98.4%	-7.6%
Hispanic	604	1.1%	769	1.6%	27.3%

Table 16.A.4
Disability by Age
 16. City of Euclid
 2010 Three-Year ACS Data

Age	Male		Female		Total	
	Disabled Population	Disability Rate	Disabled Population	Disability Rate	Disabled Population	Disability Rate
Under 5	56	4.5%	0	.0%	56	2.2%
5 to 17	360	7.3%	123	2.6%	483	5.0%
18 to 34	282	6.9%	352	6.8%	634	6.8%
35 to 64	1,531	16.9%	1,876	16.9%	3,407	16.9%
65 to 74	318	23.8%	708	37.4%	1,026	31.8%
75 or Older	537	48.2%	1,463	61.4%	2,000	57.2%
Total	3,084	14.2%	4,522	16.9%	7,606	15.7%

Table 16.A.5
Employment Status by Disability and Type: Age 18 to 64
 16. City of Euclid
 2010 Three-Year ACS Data

Disability Status	Population
Employed:	21,118
With a disability:	1,878
With a hearing difficulty	574
With a vision difficulty	312
With a cognitive difficulty	719
With an ambulatory difficulty	635
With a self-care difficulty	544
With an independent living difficulty	591
No disability	19,240
Unemployed:	2,585
With a disability:	449
With a hearing difficulty	0
With a vision difficulty	74
With a cognitive difficulty	289
With an ambulatory difficulty	169
With a self-care difficulty	0
With an independent living difficulty	77
No disability	2,136
Not in labor force:	5,755
With a disability:	1,714
With a hearing difficulty	332
With a vision difficulty	243
With a cognitive difficulty	665
With an ambulatory difficulty	1,039
With a self-care difficulty	462
With an independent living difficulty	961
No disability	4,041
Total	29,458

Table 16.A.6
Households by Income

16. City of Euclid
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	4,322	17.8%	4,063	18.2%
\$15,000 to \$19,999	1,965	8.1%	1,870	8.4%
\$20,000 to \$24,999	2,172	8.9%	1,517	6.8%
\$25,000 to \$34,999	3,640	15.0%	3,145	14.1%
\$35,000 to \$49,999	4,547	18.7%	3,383	15.1%
\$50,000 to \$74,999	4,499	18.5%	4,331	19.4%
\$75,000 to \$99,999	2,071	8.5%	2,261	10.1%
\$100,000 or More	1,096	4.5%	1,779	8.0%
Total	24,312	100.0%	22,349	100.0%

Table 16.A.7
Poverty by Age

16. City of Euclid
2000 Census SF3 & 2010 Five-Year ACS Data

Age	2000 Census		2010 Five-Year ACS	
	Persons in Poverty	% of Total	Persons in Poverty	% of Total
Under 6	549	10.9%	893	11.1%
6 to 17	852	16.9%	2,068	25.6%
18 to 64	2,572	50.9%	4,220	52.2%
65 or Older	1,082	21.4%	897	11.1%
Total	5,055	100.0%	8,078	100.0%
Poverty Rate	9.7%	.	16.6%	.

Table 16.A.8
Households by Year Home Built

16. City of Euclid
2000 Census SF3 & 2010 Five-Year ACS Data

Year Built	2000 Census		2010 Five-Year ACS	
	Households	% of Total	Households	% of Total
1939 or Earlier	3,508	14.4%	3,677	16.5%
1940 to 1949	4,870	20.0%	3,909	17.5%
1950 to 1959	7,861	32.3%	8,029	35.9%
1960 to 1969	4,381	18.0%	3,383	15.1%
1970 to 1979	2,594	10.7%	1,914	8.6%
1980 to 1989	837	3.4%	723	3.2%
1990 to 1999	302	1.2%	517	2.3%
2000 to 2004	.	.	104	.5%
2005 or Later	.	.	93	.4%
Total	24,353	100.0%	22,349	100.0%

Table 16.A.9
Housing Units by Type

16. City of Euclid
2000 Census SF3 & 2010 Five-Year ACS Data

Unit Type	2000 Census		2010 Five-Year ACS	
	Units	% of Total	Units	% of Total
Single-Family	15,951	61.1%	15,138	60.2%
Duplex	999	3.8%	878	3.5%
Tri- or Four-Plex	340	1.3%	338	1.3%
Apartment	8,823	33.8%	8,796	35.0%
Mobile Home	10	.0%	8	.0%
Boat, RV, Van, Etc.	0	.0%	0	.0%
Total	26,123	100.0%	25,158	100.0%

Table 16.A.10
Housing Units by Tenure

16. City of Euclid
2000 & 2010 Census SF1 Data

Tenure	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
Occupied Housing Units	24,353	93.2%	22,685	87.1%	-6.8%
Owner-Occupied	14,478	59.5%	12,259	54.0%	-15.3%
Renter-Occupied	9,875	40.5%	10,426	46.0%	5.6%
Vacant Housing Units	1,770	6.8%	3,352	12.9%	89.4%
Total Housing Units	26,123	100.0%	26,037	100.0%	-.3%

Table 16.A.11
Disposition of Vacant Housing Units

16. City of Euclid
2000 & 2010 Census SF1 Data

Disposition	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
For Rent	1,078	60.9%	1,795	53.6%	66.5%
For Sale	213	12.0%	531	15.8%	149.3%
Rented or Sold, Not Occupied	186	10.5%	140	4.2%	-24.7%
For Seasonal, Recreational, or Occasional Use	37	2.1%	59	1.8%	59.5%
For Migrant Workers	1	0.1%	0	.0%	-100.0%
Other Vacant	255	14.4%	827	24.7%	224.3%
Total	1,770	100.0%	3,352	100.0%	89.4%

Table 16.A.12
Households by Household Size

16. City of Euclid
2000 & 2010 Census SF1 Data

Size	2000 Census		2010 Census		% Change 00-10
	Households	% of Total	Households	% of Total	
One Person	9,677	39.7%	9,395	41.4%	-2.9%
Two Persons	7,569	31.1%	6,600	29.1%	-12.8%
Three Persons	3,330	13.7%	3,201	14.1%	-3.9%
Four Persons	2,288	9.4%	2,083	9.2%	-9.0%
Five Persons	1,012	4.2%	924	4.1%	-8.7%
Six Persons	339	1.4%	336	1.5%	-.9%
Seven Persons or More	138	.6%	146	.6%	5.8%
Total	24,353	100.0%	22,685	100.0%	-6.8%

Table 16.A.13
Household Type by Tenure
 16. City of Euclid
 2000 & 2010 Census SF1 Data

Household Type	2000 Census		2010 Census		% Change 00–10
	Households	% of Total	Households	% of Total	
Family Households	13,484	55.4%	12,187	53.7%	-9.6%
Married-Couple Family	8,831	65.5%	6,449	52.9%	-27.0%
Owner-Occupied	7,153	81.0%	5,104	79.1%	-28.6%
Renter-Occupied	1,678	19.0%	1,345	20.9%	-19.8%
Other Family	4,653	34.5%	5,738	47.1%	23.3%
Male Householder, No Spouse	942	20.2%	992	17.3%	5.3%
Owner-Occupied	543	57.6%	546	55.0%	.6%
Renter-Occupied	399	42.4%	446	45.0%	11.8%
Female Householder, No Spouse	3,711	79.8%	4,746	82.7%	27.9%
Owner-Occupied	1,777	47.9%	1,919	40.4%	8.0%
Renter-Occupied	1,934	52.1%	2,827	59.6%	46.2%
Non-Family Households	10,869	44.6%	10,498	46.3%	-3.4%
Owner-Occupied	5,005	46.0%	4,690	44.7%	-6.3%
Renter-Occupied	5,864	54.0%	5,808	55.3%	-1.0%
Total	24,353	100.0%	22,685	100.0%	-6.8%

Table 16.A.14
Group Quarters Population
 16. City of Euclid
 2000 & 2010 Census SF1 Data

Group Quarters Type	2000 Census		2010 Census		% Change 00-10
	Population	% of Total	Population	% of Total	
Institutionalized					
Correctional Institutions	39	7.7%	57	11.7%	46.2%
Juvenile Facilities	.	.	41	8.4%	.
Nursing Homes	445	87.8%	391	80.0%	-12.1%
Other Institutions	23	4.5%	0	.0%	-100.0%
Total	507	100.0%	489	100.0%	-3.6%
Noninstitutionalized					
College Dormitories	0	.0%	0	.0%	.
Military Quarters	0	.0%	0	.0%	.
Other Noninstitutional	119	100.0%	186	100.0%	56.3%
Total	119	19.0%	186	27.6%	56.3%
Total Group Quarters Population	626	100.0%	675	100.0%	7.8%

Table 16.A.15
Overcrowding and Severe Overcrowding
 16. City of Euclid
 2000 Census SF3 & 2010 Five-Year ACS Data

2000 Census GPO & 2010 Five Year ACS Data							
Data Source	No Overcrowding		Overcrowding		Severe Overcrowding		Total
	Households	% of Total	Households	% of Total	Households	% of Total	
Owner							
2000 Census	14,401	99.5%	67	.5%	11	.1%	14,479
2010 ACS	12,089	99.3%	86	.7%	0	.0%	12,175
Renter							
2000 Census	9,608	97.3%	193	2.0%	73	.7%	9,874
2010 ACS	10,092	99.2%	82	.8%	0	.0%	10,174
Total							
2000 Census	24,009	98.6%	260	1.1%	84	.3%	24,353
2010 ACS	22,181	99.2%	168	.8%	0	.0%	22,349

Table 16.A.16
Households with Incomplete Plumbing Facilities
 16. City of Euclid
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Plumbing Facilities	24,280	22,176
Lacking Complete Plumbing Facilities	73	173
Total Households	24,353	22,349
Percent Lacking	.3%	.8%

Table 16.A.17
Households with Incomplete Kitchen Facilities
 16. City of Euclid
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Kitchen Facilities	24,212	22,108
Lacking Complete Kitchen Facilities	141	241
Total Households	24,353	22,349
Percent Lacking	.6%	1.1%

Table 16.A.18
Cost Burden and Severe Cost Burden by Tenure
 16. City of Euclid
 2000 Census & 2010 Five-Year ACS Data

Data Source	Less Than 30%		31%-50%		Above 50%		Not Computed		Total
	Households	% of Total	Households	% of Total	Households	% of Total	Households	% of Total	
Owner With a Mortgage									
2000 Census	6,396	73.4%	1,537	17.6%	752	8.6%	30	.3%	8,715
2010 ACS	5,420	63.5%	1,915	22.4%	1,194	14.0%	6	.1%	8,535
Owner Without a Mortgage									
2000 Census	4,257	87.1%	309	6.3%	206	4.2%	116	2.4%	4,888
2010 ACS	2,886	79.3%	416	11.4%	311	8.5%	27	.7%	3,640
Renter									
2000 Census	5,707	58.0%	1,765	17.9%	1,926	19.6%	449	4.6%	9,847
2010 ACS	4,458	43.8%	2,176	21.4%	2,905	28.6%	635	6.2%	10,174
Total									
2000 Census	16,360	69.8%	3,611	15.4%	2,884	12.3%	595	2.5%	23,450
2010 ACS	12,764	57.1%	4,507	20.2%	4,410	19.7%	668	3.0%	22,349

Table 16.A.19
Median Housing Costs
 16. City of Euclid
 2000 Census SF3 & 2010 Five-Year ACS Data

Housing Cost	2000 Census	2010 ACS
Median Contract Rent	\$483	\$603
Median Home Value	\$90,800	\$108,700

B. BLS DATA

This section contains Bureau of Labor Statistics (BLS) data that address employment and income.

Table 16.B.1
Labor Force Statistics
 16. City of Euclid
 1990–2011 BLS Data

Year	Labor Force	Employment	Unemployment	Unemployment Rate	Statewide Unemployment Rate
1990	27,319	26,117	1,202	4.4%	5.7%
1991	26,706	25,314	1,392	5.2%	6.6%
1992	26,942	25,285	1,657	6.2%	7.4%
1993	27,262	25,666	1,596	5.9%	6.7%
1994	27,556	26,095	1,461	5.3%	5.6%
1995	27,619	26,460	1,159	4.2%	4.9%
1996	27,695	26,644	1,051	3.8%	5.0%
1997	28,020	27,001	1,019	3.6%	4.6%
1998	28,208	27,260	948	3.4%	4.3%
1999	28,409	27,446	963	3.4%	4.3%
2000	27,294	26,372	922	3.4%	4.0%
2001	27,164	26,153	1,011	3.7%	4.4%
2002	26,899	25,633	1,266	4.7%	5.7%
2003	26,561	24,840	1,721	6.5%	6.2%
2004	26,102	24,394	1,708	6.5%	6.1%
2005	25,635	24,060	1,575	6.1%	5.9%
2006	25,341	23,840	1,501	5.9%	5.4%
2007	25,347	23,672	1,675	6.6%	5.6%
2008	25,151	23,309	1,842	7.3%	6.5%
2009	24,565	22,219	2,346	9.6%	10.1%
2010	25,372	23,033	2,339	9.2%	10.0%
2011	25,491	23,338	2,153	8.4%	8.6%

C. HMDA DATA

The Home Mortgage Disclosure Act (HMDA) requires both depository and non-depository lenders to collect and publicly disclose information about housing-related loans and loan applications.⁶⁹ The information presented in this section presents detailed HMDA data, including denial rates and predatory lending including high annual percentage rate (APR) loans.

Table 16.C.1
Purpose of Loan by Year
16. City of Euclid
2004–2011 HMDA Data

Purpose	2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	1,965	2,174	2,335	1,616	859	795	589	491	10,824
Home Improvement	462	475	480	428	301	180	149	191	2,666
Refinancing	3,483	3,318	2,456	1,720	1,075	1,069	707	659	14,487
Total	5,910	5,967	5,271	3,764	2,235	2,044	1,445	1,341	27,977

Table 16.C.2
Occupancy Status for Home Purchase Loan Applications
16. City of Euclid
2004–2011 HMDA Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	Total
Owner-Occupied	1,698	1,853	1,843	1,143	722	724	556	465	9,004
Not Owner-Occupied	255	311	484	461	136	70	26	26	1,769
Not Applicable	12	10	8	12	1	1	7	0	51
Total	1,965	2,174	2,335	1,616	859	795	589	491	10,824

Table 16.C.3
Owner-Occupied Home Purchase Loan Applications by Loan Type
16. City of Euclid
2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Conventional	1,304	1,544	1,607	857	216	133	62	72	5,795
FHA - Insured	355	277	211	258	484	549	476	360	2,970
VA - Guaranteed	39	32	25	28	22	42	18	33	239
Rural Housing Service or Farm Service Agency	0	0	0	0	0	0	0	0	0
Total	1,698	1,853	1,843	1,143	722	724	556	465	9,004

⁶⁹ Data are considered “raw” because they contain entry errors and incomplete loan applications. Starting in 2004, the HMDA data made substantive changes in reporting. It modified the way it handled Hispanic data, loan interest rates, and the reporting of multifamily loan applications.

DENIAL RATES

Table 16.C.4
Loan Applications by Action Taken
 16. City of Euclid
 2004–2011 HMDA Data

Action	2004	2005	2006	2007	2008	2009	2010	2011	Total
Loan Originated	879	880	783	453	318	298	225	161	3,997
Application Approved but not Accepted	137	165	129	63	23	22	16	8	563
Application Denied	231	266	311	266	112	65	41	49	1,341
Application Withdrawn by Applicant	95	104	163	52	44	31	32	20	541
File Closed for Incompleteness	23	42	20	21	12	7	5	6	136
Loan Purchased by the Institution	333	392	437	286	213	301	237	221	2,420
Preapproval Request Denied	0	4	0	2	0	0	0	0	6
Preapproval Approved but not Accepted	0	0	0	0	0	0	0	0	0
Total	1,698	1,853	1,843	1,143	722	724	556	465	9,004
Denial Rate	20.8%	23.2%	28.4%	37.0%	26.0%	17.9%	15.4%	23.3%	25.1%

Table 16.C.5
Denial Rates by Gender of Applicant
 16. City of Euclid
 2004–2011 HMDA Data

Year	Male	Female	Not Available	Not Applicable	Average
2004	17.8%	21.2%	57.6%	100.0%	20.8%
2005	22.5%	22.1%	48.7%	%	23.2%
2006	23.7%	31.6%	33.3%	%	28.4%
2007	36.3%	36.5%	48.5%	%	37.0%
2008	25.9%	23.1%	57.1%	%	26.0%
2009	18.1%	17.6%	22.2%	.0%	17.9%
2010	15.3%	13.0%	55.6%	%	15.4%
2011	25.8%	22.1%	15.4%	%	23.3%
Average	23.3%	25.3%	44.4%	50.0%	25.1%

Table 16.C.6
Loan Applications by Selected Action Taken by Gender of Applicant
 16. City of Euclid
 2004–2011 HMDA Data

Gender		2004	2005	2006	2007	2008	2009	2010	2011	Total
Male	Originated	415	438	344	198	143	145	94	69	1,846
	Denied	90	127	107	113	50	32	17	24	560
	Denial Rate	17.8%	22.5%	23.7%	36.3%	25.9%	18.1%	15.3%	25.8%	23.3%
Female	Originated	450	422	407	238	166	145	127	81	2,036
	Denied	121	120	188	137	50	31	19	23	689
	Denial Rate	21.2%	22.1%	31.6%	36.5%	23.1%	17.6%	13.0%	22.1%	25.3%
Not Available	Originated	14	20	32	17	9	7	4	11	114
	Denied	19	19	16	16	12	2	5	2	91
	Denial Rate	57.6%	48.7%	33.3%	48.5%	57.1%	22.2%	55.6%	15.4%	44.4%
Not Applicable	Originated	0	0	0	0	0	1	0	0	1
	Denied	1	0	0	0	0	0	0	0	1
	Denial Rate	100.0%	%	%	%	%	.0%	%	%	50.0%
Total	Originated	879	880	783	453	318	298	225	161	3,997
	Denied	231	266	311	266	112	65	41	49	1,341
	Denial Rate	20.8%	23.2%	28.4%	37.0%	26.0%	17.9%	15.4%	23.3%	25.1%

Table 16.C.7
Denial Rates by Race/Ethnicity of Applicant
 16. City of Euclid
 2004–2011 HMDA Data

Race/Ethnicity	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	33.3%	25.0%	50.0%	%	%	.0%	%	%	30.0%
Asian	.0%	25.0%	22.2%	37.5%	14.3%	.0%	.0%	.0%	18.6%
Black	26.1%	27.8%	32.8%	41.2%	27.3%	22.9%	19.4%	26.5%	29.8%
White	10.3%	13.6%	16.3%	23.4%	20.1%	10.9%	7.4%	18.8%	14.4%
Not Available	41.8%	37.9%	36.4%	52.6%	46.9%	20.0%	35.3%	23.8%	39.2%
Not Applicable	100.0%	%	%	%	%	0.0%	0%	%	50.0%
Average	20.8%	23.2%	28.4%	37.0%	26.0%	17.9%	15.4%	23.3%	25.1%
Non-Hispanic	18.4%	21.4%	27.9%	36.0%	24.2%	17.9%	13.7%	24.1%	23.9%
Hispanic	41.7%	66.7%	23.5%	50.0%	50.0%	10.0%	25.0%	.0%	33.3%

Table 16.C.8
Loan Applications by Selected Action Taken by Race/Ethnicity of Applicant
 16. City of Euclid
 2004–2011 HMDA Data

Race		2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Originated	2	3	1	0	0	1	0	0	7
	Denied	1	1	1	0	0	0	0	0	3
	Denial Rate	33.3%	25.0%	50.0%	%	%	%	%	%	30.0%
Asian	Originated	3	6	7	5	6	3	2	3	35
	Denied	0	2	2	3	1	0	0	0	8
	Denial Rate	.0%	25.0%	22.2%	37.5%	14.3%	.0%	.0%	.0%	18.6%
Black	Originated	397	410	438	264	176	155	112	86	2,038
	Denied	140	158	214	185	66	46	27	31	867
	Denial Rate	26.1%	27.8%	32.8%	41.2%	27.3%	22.9%	19.4%	26.5%	29.8%
White	Originated	420	389	262	157	119	122	100	56	1,625
	Denied	48	61	51	48	30	15	8	13	274
	Denial Rate	10.3%	13.6%	16.3%	23.4%	20.1%	10.9%	7.4%	18.8%	14.4%
Not Available	Originated	57	72	75	27	17	16	11	16	291
	Denied	41	44	43	30	15	4	6	5	188
	Denial Rate	41.8%	37.9%	36.4%	52.6%	46.9%	20.0%	35.3%	23.8%	39.2%
Not Applicable	Originated	0	0	0	0	0	1	0	0	1
	Denied	1	0	0	0	0	0	0	0	1
	Denial Rate	41.8%	37.9%	36.4%	52.6%	46.9%	20.0%	35.3%	23.8%	50.0%
Total	Originated	879	880	783	453	318	298	225	161	3,997
	Denied	231	266	311	266	112	65	41	49	1,341
	Denial Rate	20.8%	23.2%	28.4%	37.0%	26.0%	17.9%	15.4%	23.3%	25.1%
Non-Hispanic	Originated	747	785	702	422	297	270	214	142	3,579
	Denied	169	214	271	237	95	59	34	45	1,124
	Denial Rate	18.4%	21.4%	27.9%	36.0%	24.2%	17.9%	13.7%	24.1%	23.9%
Hispanic	Originated	7	2	13	5	3	9	3	4	46
	Denied	5	4	4	5	3	1	1	0	23
	Denial Rate	41.7%	66.7%	23.5%	50.0%	50.0%	10.0%	25.0%	.0%	33.3%

Table 16.C.9
Loan Applications by Reason for Denial
 16. City of Euclid
 2004–2011 HMDA Data

Denial Reason	2004	2005	2006	2007	2008	2009	2010	2011	Total
Debt-to-Income Ratio	28	24	46	53	19	14	7	4	195
Employment History	5	1	3	2	2	0	1	4	18
Credit History	46	47	57	75	25	19	14	21	304
Collateral	8	18	16	19	19	14	3	5	102
Insufficient Cash	1	7	2	4	2	1	1	0	18
Unverifiable Information	6	12	14	15	4	1	3	1	56
Credit Application Incomplete	13	16	5	22	9	1	4	4	74
Mortgage Insurance Denied	0	0	1	0	0	0	0	0	1
Other	77	79	77	35	10	5	3	4	290
Missing	47	62	90	41	22	10	5	6	283
Total	231	266	311	266	112	65	41	49	1,341

Table 16.C.10
Denial Rates by Income of Applicant
 16. City of Euclid
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	77.8%	60.0%	53.3%	40.0%	85.7%	28.6%	60.0%	66.7%	59.7%
\$15,001–\$30,000	27.3%	27.5%	40.1%	39.9%	26.6%	28.3%	16.7%	24.1%	30.4%
\$30,001–\$45,000	18.1%	25.4%	27.4%	36.8%	21.8%	14.9%	13.0%	21.7%	23.9%
\$45,001–\$60,000	21.3%	18.9%	29.4%	30.6%	31.0%	15.9%	13.2%	21.2%	23.9%
\$60,001–\$75,000	21.4%	13.6%	18.2%	48.9%	20.0%	5.3%	11.5%	5.6%	21.9%
Above \$75,000	11.7%	19.6%	20.5%	30.2%	25.6%	3.8%	20.0%	30.0%	19.8%
Data Missing	20.7%	39.5%	30.3%	33.3%	.0%	.0%	100.0%	.0%	30.6%
Total	20.8%	23.2%	28.4%	37.0%	26.0%	17.9%	15.4%	23.3%	25.1%

Table 16.C.11
Denial Rates of Loans by Race/Ethnicity and Income of Applicant
 16. City of Euclid
 2004–2011 HMDA Data

Race	<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	Above \$75K	Data Missing	Average
American Indian	%	100.0%	33.3%	20.0%	%	.0%	%	30.0%
Asian	%	.0%	25.0%	18.2%	.0%	33.3%	66.7%	18.6%
Black	65.6%	37.7%	27.5%	27.2%	25.9%	29.2%	31.8%	29.8%
White	57.1%	15.8%	13.2%	14.3%	12.9%	10.5%	21.0%	14.4%
Not Available	.0%	45.9%	40.8%	32.8%	38.5%	32.5%	66.7%	39.2%
Not Applicable	%	%	100.0%	%	%	.0%	%	50.0%
Average	59.7%	30.4%	23.9%	23.9%	21.9%	19.8%	30.6%	25.1%
Non-Hispanic Ethnicity	60.7%	29.4%	22.4%	23.0%	20.6%	18.5%	27.8%	23.9%
Hispanic (Ethnicity)	100.0%	22.2%	22.7%	50.0%	25.0%	25.0%	42.9%	33.3%

Table 16.C.12
Loan Applications by Reason for Denial by Race/Ethnicity of Applicant
 16. City of Euclid
 2004–2011 HMDA Data

Denial Reason	American Indian	Asian	Black	White	Not Available	Not Applicable	Total	Hispanic (Ethnicity)
Debt-to-Income Ratio	0	1	138	44	12	0	195	1
Employment History	0	0	12	6	0	0	18	0
Credit History	2	3	198	55	46	0	304	5
Collateral	0	1	69	23	9	0	102	1
Insufficient Cash	0	0	11	5	2	0	18	1
Unverifiable Information	0	2	33	15	6	0	56	1
Credit Application Incomplete	0	1	49	18	5	1	74	1
Mortgage Insurance Denied	0	0	1	0	0	0	1	0
Other	0	0	180	71	39	0	290	7
Missing	1	0	176	37	69	0	283	6
Total	3	8	867	274	188	1	1,341	23
% Missing	33.3%	.0%	20.3%	13.5%	36.7%	.0%	21.1%	26.1%

Table 16.C.13
Loan Applications by Income of Applicant: Originated and Denied
 16. City of Euclid
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Loan Originated	2	2	7	3	1	5	2	3	25
	Application Denied	7	3	8	2	6	2	3	6	37
	Denial Rate	77.8%	60.0%	53.3%	40.0%	85.7%	28.6%	60.0%	66.7%	59.7%
\$15,001–\$30,000	Loan Originated	152	132	100	86	58	76	55	44	703
	Application Denied	57	50	67	57	21	30	11	14	307
	Denial Rate	27.3%	27.5%	40.1%	39.9%	26.6%	28.3%	16.7%	24.1%	30.4%
\$30,001–\$45,000	Loan Originated	357	326	283	156	129	103	87	54	1,495
	Application Denied	79	111	107	91	36	18	13	15	470
	Denial Rate	18.1%	25.4%	27.4%	36.8%	21.8%	14.9%	13.0%	21.7%	23.9%
\$45,001–\$60,000	Loan Originated	185	202	173	111	69	69	46	26	881
	Application Denied	50	47	72	49	31	13	7	7	276
	Denial Rate	21.3%	18.9%	29.4%	30.6%	31.0%	15.9%	13.2%	21.2%	23.9%
\$60,001–\$75,000	Loan Originated	77	102	108	47	28	18	23	17	420
	Application Denied	21	16	24	45	7	1	3	1	118
	Denial Rate	21.4%	13.6%	18.2%	48.9%	20.0%	5.3%	11.5%	5.6%	21.9%
Above \$75,000	Loan Originated	83	90	89	44	32	25	12	14	389
	Application Denied	11	22	23	19	11	1	3	6	96
	Denial Rate	11.7%	19.6%	20.5%	30.2%	25.6%	3.8%	20.0%	30.0%	19.8%
Data Missing	Loan Originated	23	26	23	6	1	2	0	3	84
	Application Denied	6	17	10	3	0	0	1	0	37
	Denial Rate	20.7%	39.5%	30.3%	33.3%	.0%	.0%	100.0%	.0%	30.6%
Total	Loan Originated	879	880	783	453	318	298	225	161	3,997
	Application Denied	231	266	311	266	112	65	41	49	1,341
	Denial Rate	20.8%	23.2%	28.4%	37.0%	26.0%	17.9%	15.4%	23.3%	25.1%

Table 16.C.14
Loan Applications by Income and Race/Ethnicity of Applicant: Originated and Denied
 16. City of Euclid
 2004–2011 HMDA Data

Race		<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	> \$75K	Data Missing	Total
American Indian	Loan Originated	0	0	2	4	0	1	0	7
	Application Denied	0	1	1	1	0	0	0	3
	Denial Rate	%	100.0%	33.3%	20.0%	%	.0%	%	30.0%
Asian	Loan Originated	0	7	9	9	7	2	1	35
	Application Denied	0	0	3	2	0	1	2	8
	Denial Rate	%	.0%	25.0%	18.2%	.0%	33.3%	66.7%	18.6%
Black	Loan Originated	11	347	813	495	206	136	30	2,038
	Application Denied	21	210	309	185	72	56	14	867
	Denial Rate	65.6%	37.7%	27.5%	27.2%	25.9%	29.2%	31.8%	29.8%
White	Loan Originated	12	303	571	293	175	222	49	1,625
	Application Denied	16	57	87	49	26	26	13	274
	Denial Rate	57.1%	15.8%	13.2%	14.3%	12.9%	10.5%	21.0%	14.4%
Not Available	Loan Originated	2	46	100	80	32	27	4	291
	Application Denied	0	39	69	39	20	13	8	188
	Denial Rate	.0%	45.9%	40.8%	32.8%	38.5%	32.5%	66.7%	39.2%
Not Applicable	Loan Originated	0	0	0	0	0	1	0	1
	Application Denied	0	0	1	0	0	0	0	1
	Denial Rate	%	%	100.0%	%	%	.0%	%	50.0%
Total	Loan Originated	25	703	1,495	881	420	389	84	3,997
	Application Denied	37	307	470	276	118	96	37	1,341
	Denial Rate	59.7%	30.4%	23.9%	23.9%	21.9%	19.8%	30.6%	25.1%
Non-Hispanic Ethnicity	Loan Originated	22	642	1,343	775	369	358	70	3,579
	Application Denied	34	267	387	232	96	81	27	1,124
	Denial Rate	60.7%	29.4%	22.4%	23.0%	20.6%	18.5%	27.8%	23.9%
Hispanic (Ethnicity)	Loan Originated	0	7	17	9	3	6	4	46
	Application Denied	1	2	5	9	1	2	3	23
	Denial Rate	100.0%	22.2%	22.7%	50.0%	25.0%	25.0%	42.9%	33.3%

PREDATORY LENDING

Table 16.C.15
Originated Owner-Occupied Loans by HAL Status
 16. City of Euclid
 2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Other	671	525	386	339	255	260	225	159	2,820
HAL	208	355	397	114	63	38	0	2	1,177
Total	879	880	783	453	318	298	225	161	3,997
Percent HAL	23.7%	40.3%	50.7%	25.2%	19.8%	12.8%	.0%	1.2%	29.4%

Table 16.C.16
Loans by Loan Purpose by HAL Status
 16. City of Euclid
 2004–2011 HMDA Data

Loan Purpose		2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	Other	671	525	386	339	255	260	225	159	2,820
	HAL	208	355	397	114	63	38	0	2	1,177
	Percent HAL	23.7%	40.3%	50.7%	25.2%	19.8%	12.8%	.0%	1.2%	29.4%
Home Improvement	Other	93	90	111	81	53	32	35	45	540
	HAL	37	36	45	21	10	6	6	2	163
	Percent HAL	28.5%	28.6%	28.8%	20.6%	15.9%	15.8%	14.6%	4.3%	23.2%
Refinancing	Other	759	574	361	306	189	269	228	215	2,901
	HAL	263	348	255	112	46	33	1	2	1,060
	Percent HAL	25.7%	37.7%	41.4%	26.8%	19.6%	10.9%	.4%	.9%	26.8%
Total	Other	1,523	1,189	858	726	497	561	488	419	6,261
	HAL	508	739	697	247	63	38	0	2	2,400
	Percent HAL	25.0%	38.3%	44.8%	25.4%	19.3%	12.1%	1.4%	1.4%	27.7%

Table 16.C.17
HALs Originated by Race of Borrower
 16. City of Euclid
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	0	2	0	0	0	0	0	0	2
Asian	0	1	3	1	2	0	0	0	7
Black	122	221	258	82	36	16	0	0	735
White	58	85	92	22	22	20	0	1	300
Not Available	28	46	44	9	3	2	0	1	133
Not Applicable	0	0	0	0	0	0	0	0	0
Total	208	355	397	114	63	38	0	2	1,177
Hispanic (Ethnicity)	2	2	10	4	0	0	0	0	18

Table 16.C.18
Rate of HALs Originated by Race/Ethnicity of Borrower
 16. City of Euclid
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	.0%	66.7%	.0%	%	%	.0%	%	%	28.6%
Asian	.0%	16.7%	42.9%	20.0%	33.3%	.0%	.0%	.0%	20.0%
Black	30.7%	53.9%	58.9%	31.1%	20.5%	10.3%	.0%	.0%	36.1%
White	13.8%	21.9%	35.1%	14.0%	18.5%	16.4%	.0%	1.8%	18.5%
Not Available	49.1%	63.9%	58.7%	33.3%	17.6%	12.5%	.0%	6.3%	45.7%
Not Applicable	%	%	%	%	%	.0%	%	%	0%
Average	23.7%	40.3%	50.7%	25.2%	19.8%	12.8%	0.0%	01.2%	29.4%
Non-Hispanic Ethnicity	21.3%	36.7%	49.3%	24.6%	20.2%	13.3%	%	.7%	%
Hispanic (Ethnicity)	28.6%	100.0%	76.9%	80.0%	.0%	.0%	.0%	.0%	39.1%

Table 16.C.19
Loans by HAL Status by Race/Ethnicity of Borrower
 16. City of Euclid
 2004–2011 HMDA Data

Race	Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Other	2	1	1	0	0	1	0	0	5
	HAL	0	2	0	0	0	0	0	0	2
	Percent HAL	.0%	66.7%	.0%	%	%	.0%	%	%	28.6%
Asian	Other	3	5	4	4	4	3	2	3	28
	HAL	0	1	3	1	2	0	0	0	7
	Percent HAL	.0%	16.7%	42.9%	20.0%	33.3%	.0%	.0%	.0%	20.0%
Black	Other	275	189	180	182	140	139	112	86	1,303
	HAL	122	221	258	82	36	16	0	0	735
	Percent HAL	30.7%	53.9%	58.9%	31.1%	20.5%	10.3%	.0%	.0%	36.1%
White	Other	362	304	170	135	97	102	100	55	1,325
	HAL	58	85	92	22	22	20	0	1	300
	Percent HAL	13.8%	21.9%	35.1%	14.0%	18.5%	16.4%	0.0%	01.8%	18.5%
Not Available	Other	29	26	31	18	14	14	11	15	158
	HAL	28	46	44	9	3	2	0	1	133
	Percent HAL	49.1%	63.9%	58.7%	33.3%	17.6%	12.5%	.0%	6.3%	45.7%
Not Applicable	Other	0	0	0	0	0	1	0	0	1
	HAL	0	0	0	0	0	0	0	0	0
	Percent HAL	%	%	%	%	%	.0%	%	%	0.0%
Total	Other	671	525	386	339	255	260	225	159	2,820
	HAL	208	355	397	114	63	38	0	2	1,177
	Percent HAL	23.7%	40.3%	50.7%	25.2%	19.8%	12.8%	.0%	1.2%	29.4%
Non-Hispanic Ethnicity	Other	588	497	356	318	237	234	214	141	2,585
	HAL	159	288	346	104	60	36		1	
	Percent HAL	21.3%	36.7%	49.3%	24.6%	20.2%	13.3%	%	.7%	%
Hispanic (Ethnicity)	Other	5	0	3	1	3	9	3	4	28
	HAL	2	2	10	4	0	0	0	0	18
	Percent HAL	28.6%	100.0%	76.9%	80.0%	.0%	.0%	.0%	.0%	39.1%

Table 16.C.20
Rates of HALs by Income of Borrower
 16. City of Euclid
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Average
\$15,000 or Below	.0%	50.0%	28.6%	.0%	.0%	.0%	.0%	.0%	12.0%
\$15,001–\$30,000	29.6%	40.2%	51.0%	20.9%	24.1%	17.1%	.0%	2.3%	27.7%
\$30,001–\$45,000	25.5%	42.0%	50.9%	25.0%	17.1%	12.6%	.0%	1.9%	29.9%
\$45,001–\$60,000	20.5%	42.6%	53.2%	27.0%	24.6%	13.0%	.0%	.0%	30.9%
\$60,001–\$75,000	22.1%	49.0%	52.8%	34.0%	17.9%	5.6%	.0%	.0%	34.8%
Above \$75,000	16.9%	26.7%	42.7%	22.7%	15.6%	8.0%	0.0%	.0%	23.9%
Data Missing	13.0%	15.4%	56.5%	16.7%	.0%	.0%	%	.0%	25.0%
Average	23.7%	40.3%	50.7%	25.2%	19.8%	12.8%	.0%	1.2%	29.4%

Table 16.C.21
Loans by HAL Status by Income of Borrower
 16. City of Euclid
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Other	2	1	5	3	1	5	2	3	22
	HAL	0	1	2	0	0	0	0	0	3
	Percent HAL	.0%	50.0%	28.6%	.0%	.0%	.0%	.0%	.0%	12.0%
\$15,001–\$30,000	Other	107	79	49	68	44	63	55	43	508
	HAL	45	53	51	18	14	13	0	1	195
	Percent HAL	29.6%	40.2%	51.0%	20.9%	24.1%	17.1%	.0%	2.3%	27.7%
\$30,001–\$45,000	Other	266	189	139	117	107	90	87	53	1,048
	HAL	91	137	144	39	22	13	0	1	447
	Percent HAL	25.5%	42.0%	50.9%	25.0%	17.1%	12.6%	.0%	1.9%	29.9%
\$45,001–\$60,000	Other	147	116	81	81	52	60	46	26	609
	HAL	38	86	92	30	17	9	0	0	272
	Percent HAL	20.5%	42.6%	53.2%	27.0%	24.6%	13.0%	.0%	.0%	30.9%
\$60,001–\$75,000	Other	60	52	51	31	23	17	23	17	274
	HAL	17	50	57	16	5	1	0	0	146
	Percent HAL	22.1%	49.0%	52.8%	34.0%	17.9%	5.6%	.0%	.0%	34.8%
Above \$75,000	Other	69	66	51	34	27	23	12	14	296
	HAL	14	24	38	10	5	2	0	0	93
	Percent HAL	16.9%	26.7%	42.7%	22.7%	15.6%	8.0%	.0%	.0%	23.9%
Data Missing	Other	20	22	10	5	1	2	0	3	63
	HAL	3	4	13	1	0	0	0	0	21
	Percent HAL	13.0%	15.4%	56.5%	16.7%	.0%	.0%	%	.0%	25.0%
Total	Other	671	525	386	339	255	260	225	159	2,820
	HAL	208	355	397	114	63	38	0	2	1,177
	Percent HAL	23.7%	40.3%	50.7%	25.2%	19.8%	12.8%	.0%	1.2%	29.4%

D. CRA DATA

Additional data tables related to Community Reinvestment Act (CRA) data are presented in this section.

Table 16.D.1
Small Business Loans Originated: \$100,000 or Less by Tract MFI
 16. City of Euclid
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000		112	409			521
2001		139	626			765
2002		166	842			1,008
2003		506	358	55		919
2004		347	375	93		815
2005		334	373	33		740
2006		406	489	48		943
2007		441	568	59		1,068
2008		367	427	44		838
2009		160	160	14		334
2010		152	130	18		300
2011		160	174	22		356
Total	0	3,290	4,931	386	0	8,607
Loan Amount (\$1,000s)						
2000		1,800	4,179			5,979
2001		1,506	5,378			6,884
2002		1,758	7,595			9,353
2003		4,109	3,016	356		7,481
2004		3,775	3,214	826		7,815
2005		3,804	3,273	600		7,677
2006		3,840	4,956	329		9,125
2007		4,887	5,094	442		10,423
2008		3,151	3,706	236		7,093
2009		2,523	1,780	64		4,367
2010		2,777	1,387	135		4,299
2011		2,722	1,859	130		4,711
Total	0	36,652	45,437	3,118	0	85,207

Table 16.D.2
Small Business Loans Originated: \$100,001 to \$250,000 by Tract MFI
 16. City of Euclid
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000		5	12			17
2001		10	13			23
2002		11	20			31
2003		11	15	1		27
2004		18	14	0		32
2005		14	7	1		22
2006		13	3	0		16
2007		10	4	0		14
2008		15	6	0		21
2009		10	5	0		15
2010		9	4	0		13
2011		9	4	0		13
Total	0	135	107	2	0	244
Loan Amount (\$1,000s)						
2000		843	2,131			2,974
2001		1,718	1,944			3,662
2002		2,116	3,309			5,425
2003		2,102	2,476	250		4,828
2004		3,114	2,799	0		5,913
2005		2,616	1,292	250		4,158
2006		2,488	650	0		3,138
2007		1,916	837	0		2,753
2008		2,533	954	0		3,487
2009		1,666	943	0		2,609
2010		1,662	850	0		2,512
2011		1,293	751	0		2,044
Total	0	24,067	18,936	500	0	43,503

Table 16.D.3
Small Business Loans Originated: More than \$250,000 by Tract MFI
 16. City of Euclid
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000		2	14			16
2001		8	9			17
2002		7	21			28
2003		22	7	0		29
2004		13	6	0		19
2005		17	7	3		27
2006		14	9	1		24
2007		12	9	0		21
2008		10	10	0		20
2009		10	4	0		14
2010		17	5	0		22
2011		15	6	0		21
Total	0	147	107	4	0	258
Loan Amount (\$1,000s)						
2000		840	6,497			7,337
2001		3,679	5,620			9,299
2002		3,219	12,195			15,414
2003		11,707	4,046	0		15,753
2004		7,088	3,346	0		10,434
2005		10,052	4,477	2,340		16,869
2006		6,723	4,603	350		11,676
2007		5,050	5,695	0		10,745
2008		5,733	5,645	0		11,378
2009		4,909	1,838	0		6,747
2010		10,029	3,355	0		13,384
2011		7,801	2,456	0		10,257
Total	0	76,830	59,773	2,690	0	139,293

Table 16.D.4
Small Business Loans to Businesses with Gross Annual Revenues of Less Than \$1 Million by Tract MFI
 16. City of Euclid
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000		39	161			200
2001		64	187			251
2002		39	133			172
2003		102	126	5		233
2004		118	130	8		256
2005		139	177	12		328
2006		138	206	16		360
2007		158	215	16		389
2008		108	139	6		253
2009		56	66	2		124
2010		62	62	6		130
2011		67	97	9		173
Total	0	1,090	1,699	80	0	2,869
Loan Amount (\$1,000s)						
2000		1,356	5,479			6,835
2001		2,500	4,389			6,889
2002		1,848	8,564			10,412
2003		5,822	5,625	271		11,718
2004		5,384	4,025	152		9,561
2005		5,166	3,960	114		9,240
2006		3,660	3,541	146		7,347
2007		2,717	2,794	175		5,686
2008		2,305	2,332	27		4,664
2009		1,600	2,025	5		3,630
2010		1,067	1,005	61		2,133
2011		1,929	1,786	90		3,805
Total	0	35,354	45,525	1,041	0	81,920

E. COMPLAINT DATA

This section contains data regarding fair housing complaints, as provided by the U.S. Department of Housing and Urban Development (HUD), the Ohio Civil Rights Commission (OCRC), and the Fair Housing Contact Service (FHCS).

HUD COMPLAINTS

Table 16.E.1
Fair Housing Complaints by Basis
16. City of Euclid
2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability	2	5	1			1	3	1		13
Family Status				3	2		1	4		10
National Origin			2							2
Race	3		4		6	3	2			18
Religion		1								1
Sex	1				1					2
Total Bases	6	6	7	3	9	4	6	5		46
Total Complaints	4	6	5	3	8	4	4	5		39

Table 16.E.2
Fair Housing Complaints by Issue
16. City of Euclid
2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Discriminatory terms, conditions, privileges, or services and facilities			1		3		4	1		9
Failure to make reasonable accommodation			4	1			1	2		8
Discriminatory refusal to rent	2	1		3					1	7
Discrimination in terms, conditions or privileges relating to rental		1				1	1	2	1	6
Discriminatory refusal to sell			1		1					2
Discriminatory advertising, statements, and notices	1						1			2
Discriminatory advertisement - rental								2		2
Discrimination in services and facilities relating to rental						1		1		2
Other discriminatory acts					2					2
Discriminatory refusal to sell and negotiate for sale						1				1
Discriminatory refusal to rent and negotiate for rental		1								1
Discriminatory financing (includes real estate transactions)						1				1
Discrimination in the terms or conditions for making loans						1				1
Discrimination in services and facilities relating to sale						1				1
Steering			1							1
Restriction of choices relative to a rental						1				1
Discriminatory acts under Section 818 (coercion, etc.)		1								1
Total Issues	4	8	6	3	8	9	5	5	0	48
Total Complaints	4	6	5	3	8	4	4	5		39

Table 16.E.3
Fair Housing Complaints by Closure Status
 16. City of Euclid
 2004–2012 HUD Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Administrative Closure Cause (FHAP)	1	2			2	1		1		7
Conciliated / Settled		2			2	2	2	3		11
No Cause		1	2	1		1	2			7
	3	1	3	2	4			1		14
Total Complaints	4	6	5	3	8	4	4	5		39

HUD Complaints Found With Cause

Table 16.E.4
Fair Housing Complaints Found With Cause by Basis
 16. City of Euclid
 2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability		3	1			1	3			8
Family Status				1			1	3		5
National Origin			1							1
Race			1			2	2			5
Religion		1								1
Total Bases	4	3	1	1	3	6	3	3		20
Total Complaints	3	2	1	2	3	4	3			18

Table 16.E.5
Fair Housing Complaints Found With Cause by Issue
 16. City of Euclid
 2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Failure to make reasonable accommodation			2	1			1	2		6
Discrimination in terms, conditions or privileges relating to rental			1				1	2	1	5
Discriminatory refusal to rent			1		1					2
Discriminatory advertisement - rental									2	2
Discriminatory terms, conditions, privileges, or services and facilities					1		1			2
Other discriminatory acts						2				2
Discriminatory refusal to rent and negotiate for rental			1							1
Discriminatory advertising, statements, and notices								1		1
Discriminatory financing (includes real estate transactions)							1			1
Discrimination in the terms or conditions for making loans							1			1
Discrimination in services and facilities relating to rental							1			1
Restriction of choices relative to a rental							1			1
Total Issues	0	5	2	1	2	7	5	3	0	25
Total Complaints		3	2	1	2	3	4	3		18

OHIO CIVIL RIGHTS COMMISSION COMPLAINTS

Table 16.E.6
Fair Housing Complaints by Basis
 16. City of Euclid
 2004–2012 OCRC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability	1	1	2				2			6
Family Status				2	2					4
Gender		1			1		1			3
National Origin			1							1
Race	2	2	4	1		2	2			18
Religion		1								1
Retaliation		1	1	1	2	2	1	1		9
Other				1						1
Total Bases	3	6	8	5	12	2	6	1	0	43
Total Complaints	3	3	7	4	9	2	3	1		32

Table 16.E.7
Fair Housing Complaints by Issue
 16. City of Euclid
 2004–2012 OCRC Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Exclusion	1	1		1	1					4
Harassment	1		1	1	5	2	1			11
Intimidation					4					4
Other	1	1	4	3	5			1		15
Reasonable Accommodation		1	1				1			3
Terms and Conditions		2	1		2		1	1		7
Total Issues	3	5	7	5	17	2	3	2	0	44
Total Complaints	3	3	7	4	9	2	3	1		32

Table 16.E.8
Fair Housing Complaints by Closure Status
 16. City of Euclid
 2004–2012 OCRC Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Administrative Closure							1	1		2
CP Failed to Cooperate					1					1
CP Withdrawal – No Benefit	1	1		1						3
No Cause Finding Issued	2	1	3	3	5					14
Open Charge Closed By Legal Activity			1							1
Settlement With Benefits			2				1			3
Withdrawal With Benefits		1	1		3	2	1			8
Total Complaints	3	3	7	4	9	2	3	1	0	32

FAIR HOUSING CONTACT SERVICE COMPLAINTS

Table 16.E.9
Fair Housing Complaints by Basis
16. City of Euclid
2004–2012 FHCS Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color				1						1
Race				1						1
Sex				1						1
Total Bases	0	0	0	3	0	0	0	0	0	3
Total Complaints				1						1

Table 16.E.10
Fair Housing Complaints by Closure Status
16. City of Euclid
2004–2012 FHCS Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
No probable cause				1						1
Total Complaints	0	0	0	1	0	0	0	0	0	1

THE HOUSING RESEARCH AND ADVOCACY CENTER

Table 16.E.11
Fair Housing Complaints by Basis
16 City of Euclid
2004–2012 HRAC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability							3	1	1	5
Race						1		2	2	5
Color									2	2
Religion						1	1			2
Ethnicity									1	1
Familial Status	1									1
Gender									1	1
National Origin									1	1
Sex							1			1
Other									1	1
Total Bases	1	0	0	0	0	2	5	3	9	20
Total Complaints	1					1	5	3	4	14

Table 16.12
Fair Housing Complaints by Issue
City of Euclid
2004–2012 HRAC Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Rental	1					1	5	3	4	14
Total	1	0	0	0	0	1	5	3	4	14
Total Complaints	1					1	5	3	4	14

Table 16.13
Fair Housing Complaints by Action Taken
 City of Euclid
 2004–2012 HRAC Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Referred to OCRC	1						1	1	2	5
Fair Housing Info Given								1	1	2
Referred to Attorney							1	1		2
Referred to City							2			2
Missing Action						1	1		1	3
Total	1	0	0	0	0	1	5	3	4	14
Total Complaints	1					1	5	3	4	14

F. FAIR HOUSING SURVEY FOR HOUSING STAKEHOLDERS DATA

No responses were received from Euclid in the 2012–2013 Fair Housing Survey for Housing Stakeholders.

G. LAND USE PLANNING SURVEY DATA

This section contains data regarding the potential effects of local land use and housing policies on fair housing choice, as gathered from the Land Use Planning Interview.

ENTITLEMENT COMMUNITY LAND USE PLANNING INTERVIEWS

In the Region's 18 entitlement cities and four entitlement counties, public sector policies were evaluated through individual telephone interviews that followed the structure of the 2012–2013 Fair Housing Survey for Government Officials, an online survey for nonentitlement community planning staff. This allowed for more thorough answers to the same key questions about public sector policies.

The appropriate planning and community development staff person or persons at these communities was solicited from members of the Progress Review Team, representing each entitlement community.

Table 16.G.1
Housing Development
 16. City of Euclid
 2012 Land Use Planning Interview Data

Question: Does your jurisdiction...	Response
Housing Development	
Have a definition for the term "dwelling unit"?	Yes
Encourage or allocate funding for affordable housing development?	Yes
Have any potential barriers to the development of low- to moderate- income housing?	Yes
Occupancy Standards	
Have a definition for the term "family"?	Yes
Have any residential occupancy standards or limits?	Yes
Allow the mixed-use housing development?	Don't know
Have any potential barriers to the development of mixed-use housing?	Yes
Special Needs Housing	
Have a definition for the term "disability"?	No
Have any particular standards/policies regarding accessible housing?	No
Have any special process for persons with disabilities to request variances for accessible housing?	No
Have any special standards for the development of senior housing?	No
Distinguish senior citizen housing from other residential uses in any way?	Yes
Address group housing, or have any special policies for any other special needs housing?	Yes
Fair Housing Policies	
Have a fair housing ordinance, policy, or regulation?	Yes
Participate in any activities or practices for "affirmatively furthering fair housing"?	Yes

H. IMPEDIMENTS

The 2013 Northeast Ohio Regional Analysis of Impediments to Fair Housing Choice uncovered several potential issues regarding fair housing in the City of Euclid. Identification of these items as probable impediments to fair housing choice was based on HUD's definition of impediments as actions, omissions, or decisions that restrict housing choice due to protected class status or actions, omissions, or decisions that have this effect. The identified impediments are supported by evidence uncovered during the Regional AI process, with impediments of higher need being those identified in multiple sources.

These probable impediments in the entirety of the Northeast Ohio Region are presented in **Volumes I and II** of the Regional AI. They are accompanied by suggested actions that jurisdictions in the Region may implement in order to alleviate or eliminate these impediments, and are accompanied by measurable objectives. The goal of these actions and measurable objectives is to assist these agencies in offering greater housing choice for all citizens of the Northeast Ohio Region.

The following list presents the private and public sector impediments found in the City of Euclid.

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 in Euclid.

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, including Euclid.

Suggestion: Construct a regional 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 in Euclid. 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 other local units of government as co-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 in Euclid as well.

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, including those in Euclid.

Suggestion: Construct a regional 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.

IMPEDIMENTS MATRIX

The matrix on the following page includes the impediment, data source, or sources that indicated its existence, protected classes most affected, and ranking of need for action. Level of need for action was determined based on the number of data sources that identified each impediment.

Table 16.H.1
Impediments Matrix
 16. City of Euclid
 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 ⁷⁰			
Private Sector													
1	Denial of available housing units in the rental markets		X				X	X				Black and Hispanic persons	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				Disabled persons	L
Public Sector													
1	Lack of sufficient fair housing policies or practices by several units of local government							X				All	L
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		All	M
5	Decisions regarding definitions of "family," "dwelling unit," and related terms									X		Disabled persons, families	L
6	Lack of inclusionary policies							X		X		All	M

⁷⁰ 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.

17. CITY OF LAKEWOOD

A. CENSUS BUREAU DATA

This section contains additional data from the U.S. Census Bureau.

Table 17.A.1

Population by Age

17. City of Lakewood

2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00-10
	Population	% of Total	Population	% of Total	
Under 5	3,340	5.9%	3,023	5.8%	-9.5%
5 to 19	9,937	17.5%	8,250	15.8%	-17.0%
20 to 24	4,023	7.1%	3,904	7.5%	-3.0%
25 to 34	11,728	20.7%	10,498	20.1%	-10.5%
35 to 54	16,742	29.6%	14,794	28.4%	-11.6%
55 to 64	3,988	7.0%	5,932	11.4%	48.7%
65 or Older	6,888	12.2%	5,730	11.0%	-16.8%
Total	56,646	100.0%	52,131	100.0%	-8.0%

Table 17.A.2

Elderly Population by Age

17. City of Lakewood

2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00-10
	Population	% of Total	Population	% of Total	
65 to 66	654	9.5%	731	12.8%	11.8%
67 to 69	884	12.8%	931	16.2%	5.3%
70 to 74	1,669	24.2%	1,192	20.8%	-28.6%
75 to 79	1,438	20.9%	964	16.8%	-33.0%
80 to 84	1,146	16.6%	972	17.0%	-15.2%
85 or Older	1,097	15.9%	940	16.4%	-14.3%
Total	6,888	100.0%	5,730	100.0%	-16.8%

Table 17.A.3

Population by Race and Ethnicity

17. City of Lakewood

2000 & 2010 Census SF1 Data

Race	2000 Census		2010 Census		% Change 00-10
	Population	% of Total	Population	% of Total	
White	52,723	93.1%	45,598	87.5%	-13.5%
Black	1,116	2.0%	3,340	6.4%	199.3%
American Indian	139	.2%	149	.3%	7.2%
Asian	800	1.4%	988	1.9%	23.5%
Native Hawaiian/ Pacific Islander	15	.0%	9	.0%	-40.0%
Other	349	.6%	655	1.3%	87.7%
Two or More Races	1,504	2.7%	1,392	2.7%	-7.4%
Total	56,646	100.0%	52,131	100.0%	-8.0%
Non-Hispanic	55,377	97.8%	49,984	95.9%	-9.7%
Hispanic	1,269	2.2%	2,147	4.1%	69.2%

Table 17.A.4
Disability by Age
 17. City of Lakewood
 2010 Three-Year ACS Data

Age	Male		Female		Total	
	Disabled Population	Disability Rate	Disabled Population	Disability Rate	Disabled Population	Disability Rate
Under 5	0	.0%	0	.0%	0	.0%
5 to 17	521	13.8%	109	3.1%	630	8.6%
18 to 34	258	3.2%	721	8.4%	979	5.9%
35 to 64	1,242	12.3%	1,096	11.0%	2,338	11.6%
65 to 74	307	25.7%	493	36.3%	800	31.3%
75 or Older	563	51.7%	792	45.1%	1,355	47.6%
Total	2,891	11.3%	3,211	12.1%	6,102	11.7%

Table 17.A.5
Employment Status by Disability and Type: Age 18 to 64
 17. City of Lakewood
 2010 Three-Year ACS Data

Disability Status	Population
Employed:	28,490
With a disability:	1,388
With a hearing difficulty	300
With a vision difficulty	401
With a cognitive difficulty	596
With an ambulatory difficulty	512
With a self-care difficulty	191
With an independent living difficulty	410
No disability	27,102
Unemployed:	3,209
With a disability:	582
With a hearing difficulty	21
With a vision difficulty	27
With a cognitive difficulty	357
With an ambulatory difficulty	243
With a self-care difficulty	0
With an independent living difficulty	291
No disability	2,627
Not in labor force:	4,982
With a disability:	1,347
With a hearing difficulty	205
With a vision difficulty	45
With a cognitive difficulty	729
With an ambulatory difficulty	829
With a self-care difficulty	381
With an independent living difficulty	827
No disability	3,635
Total	36,681

Table 17.A.6**Households by Income**

17. City of Lakewood

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	3,881	14.5%	4,439	17.9%
\$15,000 to \$19,999	1,602	6.0%	1,552	6.3%
\$20,000 to \$24,999	1,872	7.0%	1,350	5.4%
\$25,000 to \$34,999	4,046	15.1%	2,828	11.4%
\$35,000 to \$49,999	5,102	19.1%	4,080	16.5%
\$50,000 to \$74,999	5,295	19.8%	4,367	17.6%
\$75,000 to \$99,999	2,471	9.2%	2,608	10.5%
\$100,000 or More	2,452	9.2%	3,576	14.4%
Total	26,721	100.0%	24,800	100.0%

Table 17.A.7**Poverty by Age**

17. City of Lakewood

2000 Census SF3 & 2010 Five-Year ACS Data

Age	2000 Census		2010 Five-Year ACS	
	Persons in Poverty	% of Total	Persons in Poverty	% of Total
Under 6	507	10.2%	890	11.3%
6 to 17	908	18.3%	1,177	14.9%
18 to 64	2,984	60.2%	5,097	64.7%
65 or Older	557	11.2%	719	9.1%
Total	4,956	100.0%	7,883	100.0%
Poverty Rate	8.9%	.	15.1%	.

Table 17.A.8**Households by Year Home Built**

17. City of Lakewood

2000 Census SF3 & 2010 Five-Year ACS Data

Year Built	2000 Census		2010 Five-Year ACS	
	Households	% of Total	Households	% of Total
1939 or Earlier	16,271	61.0%	15,986	64.5%
1940 to 1949	2,502	9.4%	1,790	7.2%
1950 to 1959	2,503	9.4%	1,972	8.0%
1960 to 1969	3,409	12.8%	2,710	10.9%
1970 to 1979	1,482	5.6%	1,569	6.3%
1980 to 1989	433	1.6%	460	1.9%
1990 to 1999	93	.3%	178	.7%
2000 to 2004	.	.	47	.2%
2005 or Later	.	.	88	.4%
Total	26,693	100.0%	24,800	100.0%

Table 17.A.9**Housing Units by Type**

17. City of Lakewood

2000 Census SF3 & 2010 Five-Year ACS Data

Unit Type	2000 Census		2010 Five-Year ACS	
	Units	% of Total	Units	% of Total
Single-Family	10,711	37.7%	10,540	37.4%
Duplex	5,481	19.3%	5,613	19.9%
Tri- or Four-Plex	2,007	7.1%	1,779	6.3%
Apartment	10,196	35.9%	10,152	36.1%
Mobile Home	14	.0%	64	.2%
Boat, RV, Van, Etc.	7	.0%	0	.0%
Total	28,416	100.0%	28,148	100.0%

Table 17.A.10**Housing Units by Tenure**

17. City of Lakewood

2000 & 2010 Census SF1 Data

Tenure	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
Occupied Housing Units	26,693	93.9%	25,274	88.7%	-5.3%
Owner-Occupied	12,063	45.2%	10,956	43.3%	-9.2%
Renter-Occupied	14,630	54.8%	14,318	56.7%	-2.1%
Vacant Housing Units	1,723	6.1%	3,224	11.3%	87.1%
Total Housing Units	28,416	100.0%	28,498	100.0%	.3%

Table 17.A.11**Disposition of Vacant Housing Units**

17. City of Lakewood

2000 & 2010 Census SF1 Data

Disposition	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
For Rent	995	57.7%	1,959	60.8%	96.9%
For Sale	115	6.7%	304	9.4%	164.3%
Rented or Sold, Not Occupied	105	6.1%	210	6.5%	100.0%
For Seasonal, Recreational, or Occasional Use	151	8.8%	108	3.3%	-28.5%
For Migrant Workers	0	0.0%	0	.0%	%
Other Vacant	357	20.7%	643	19.9%	80.1%
Total	1,723	100.0%	3,224	100.0%	87.1%

Table 17.A.12**Households by Household Size**

17. City of Lakewood

2000 & 2010 Census SF1 Data

Size	2000 Census		2010 Census		% Change 00-10
	Households	% of Total	Households	% of Total	
One Person	11,646	43.6%	11,316	44.8%	-2.8%
Two Persons	7,691	28.8%	7,355	29.1%	-4.4%
Three Persons	3,224	12.1%	3,025	12.0%	-6.2%
Four Persons	2,426	9.1%	2,139	8.5%	-11.8%
Five Persons	1,110	4.2%	892	3.5%	-19.6%
Six Persons	396	1.5%	340	1.3%	-14.1%
Seven Persons or More	200	.7%	207	.8%	3.5%
Total	26,693	100.0%	25,274	100.0%	-5.3%

Table 17.A.13
Household Type by Tenure
 17. City of Lakewood
 2000 & 2010 Census SF1 Data

Household Type	2000 Census		2010 Census		% Change 00-10
	Households	% of Total	Households	% of Total	
Family Households	12,556	47.0%	11,207	44.3%	-10.7%
Married-Couple Family	9,084	72.3%	7,499	66.9%	-17.4%
Owner-Occupied	6,617	72.8%	5,613	74.8%	-15.2%
Renter-Occupied	2,467	27.2%	1,886	25.2%	-23.6%
Other Family	3,472	27.7%	3,708	33.1%	6.8%
Male Householder, No Spouse	878	25.3%	966	26.1%	10.0%
Owner-Occupied	388	44.2%	355	36.7%	-8.5%
Renter-Occupied	490	55.8%	611	63.3%	24.7%
Female Householder, No Spouse	2,594	74.7%	2,742	73.9%	5.7%
Owner-Occupied	1,087	41.9%	923	33.7%	-15.1%
Renter-Occupied	1,507	58.1%	1,819	66.3%	20.7%
Non-Family Households	14,137	53.0%	14,067	55.7%	-.5%
Owner-Occupied	3,971	28.1%	4,065	28.9%	2.4%
Renter-Occupied	10,166	71.9%	10,002	71.1%	-1.6%
Total	26,693	100.0%	25,274	100.0%	-5.3%

Table 17.A.14
Group Quarters Population
 17. City of Lakewood
 2000 & 2010 Census SF1 Data

Group Quarters Type	2000 Census		2010 Census		% Change 00-10
	Population	% of Total	Population	% of Total	
Institutionalized					
Correctional Institutions	5	1.2%	0	.0%	-100.0%
Juvenile Facilities	.	.	1	.3%	.
Nursing Homes	406	98.8%	303	99.7%	-25.4%
Other Institutions	0	.0%	0	.0%	%
Total	411	100.0%	304	100.0%	-26.0%
Noninstitutionalized					
College Dormitories	218	60.4%	36	54.5%	-83.5%
Military Quarters	0	.0%	0	.0%	%
Other Noninstitutional	143	39.6%	30	45.5%	-79.0%
Total	361	46.8%	66	17.8%	-81.7%
Total Group Quarters Population	772	100.0%	370	100.0%	-52.1%

Table 17.A.15
Overcrowding and Severe Overcrowding
 17. City of Lakewood
 2000 Census SF3 & 2010 Five-Year ACS Data

2000 Census GPO & 2010 Five Year ACS Data							
Data Source	No Overcrowding		Overcrowding		Severe Overcrowding		Total
	Households	% of Total	Households	% of Total	Households	% of Total	
Owner							
2000 Census	11,959	99.2%	79	.7%	13	.1%	12,051
2010 ACS	10,808	99.5%	53	.5%	0	.0%	10,861
Renter							
2000 Census	14,304	97.7%	212	1.4%	126	.9%	14,642
2010 ACS	13,757	98.7%	139	1.0%	43	.3%	13,939
Total							
2000 Census	26,263	98.4%	291	1.1%	139	.5%	26,693
2010 ACS	24,565	99.1%	192	.8%	43	.2%	24,800

Table 17.A.16
Households with Incomplete Plumbing Facilities
 17. City of Lakewood
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Plumbing Facilities	26,632	24,653
Lacking Complete Plumbing Facilities	61	147
Total Households	26,693	24,800
Percent Lacking	.2%	.6%

Table 17.A.17
Households with Incomplete Kitchen Facilities
 17. City of Lakewood
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Kitchen Facilities	26,582	24,557
Lacking Complete Kitchen Facilities	111	243
Total Households	26,693	24,800
Percent Lacking	.4%	1.0%

Table 17.A.18
Cost Burden and Severe Cost Burden by Tenure
 17. City of Lakewood
 2000 Census & 2010 Five-Year ACS Data

Data Source	Less Than 30%		31%-50%		Above 50%		Not Computed		Total
	Households	% of Total	Households	% of Total	Households	% of Total	Households	% of Total	
Owner With a Mortgage									
2000 Census	5,104	76.3%	1,115	16.7%	440	6.6%	31	.5%	6,690
2010 ACS	5,277	64.6%	1,968	24.1%	912	11.2%	13	.2%	8,170
Owner Without a Mortgage									
2000 Census	1,817	86.9%	172	8.2%	96	4.6%	6	.3%	2,091
2010 ACS	2,037	75.7%	250	9.3%	345	12.8%	59	2.2%	2,691
Renter									
2000 Census	9,774	66.8%	2,477	16.9%	1,803	12.3%	588	4.0%	14,642
2010 ACS	7,067	50.7%	3,372	24.2%	2,929	21.0%	571	4.1%	13,939
Total									
2000 Census	16,695	71.3%	3,764	16.1%	2,339	10.0%	625	2.7%	23,423
2010 ACS	14,381	58.0%	5,590	22.5%	4,186	16.9%	643	2.6%	24,800

Table 17.A.19
Median Housing Costs
 17. City of Lakewood
 2000 Census SF3 & 2010 Five-Year ACS Data

Housing Cost	2000 Census	2010 ACS
Median Contract Rent	\$492	\$584
Median Home Value	\$117,900	\$138,500

B. BLS DATA

This section contains Bureau of Labor Statistics (BLS) data that address employment and income.

Table 17.B.1
Labor Force Statistics
 17. City of Lakewood
 1990–2011 BLS Data

Year	Labor Force	Employment	Unemployment	Unemployment Rate	Statewide Unemployment Rate
1990	33,402	32,192	1,210	3.6%	5.7%
1991	32,604	31,203	1,401	4.3%	6.6%
1992	32,835	31,166	1,669	5.1%	7.4%
1993	33,243	31,636	1,607	4.8%	6.7%
1994	33,635	32,164	1,471	4.4%	5.6%
1995	33,782	32,615	1,167	3.5%	4.9%
1996	33,899	32,841	1,058	3.1%	5.0%
1997	34,308	33,282	1,026	3.0%	4.6%
1998	34,554	33,600	954	2.8%	4.3%
1999	34,799	33,830	969	2.8%	4.3%
2000	34,492	33,628	864	2.5%	4.0%
2001	34,297	33,349	948	2.8%	4.4%
2002	33,873	32,686	1,187	3.5%	5.7%
2003	33,361	31,694	1,667	5.0%	6.2%
2004	32,856	31,188	1,668	5.1%	6.1%
2005	32,413	30,822	1,591	4.9%	5.9%
2006	32,011	30,492	1,519	4.7%	5.4%
2007	31,911	30,244	1,667	5.2%	5.6%
2008	31,623	29,756	1,867	5.9%	6.5%
2009	30,719	28,352	2,367	7.7%	10.1%
2010	31,675	29,303	2,372	7.5%	10.0%
2011	31,799	29,691	2,108	6.6%	8.6%

C. HMDA DATA

The Home Mortgage Disclosure Act (HMDA) requires both depository and non-depository lenders to collect and publicly disclose information about housing-related loans and loan applications.⁷¹ The information presented in this section presents detailed HMDA data, including denial rates and predatory lending including high annual percentage rate (APR) loans.

Table 17.C.1
Purpose of Loan by Year
17. City of Lakewood
2004–2011 HMDA Data

Purpose	2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	1,592	1,871	1,714	1,104	890	856	696	622	9,345
Home Improvement	347	321	403	442	293	184	151	119	2,260
Refinancing	2,598	2,323	1,852	1,339	897	1,164	1,154	1,162	12,489
Total	4,537	4,515	3,969	2,885	2,080	2,204	2,001	1,903	24,094

Table 17.C.2
Occupancy Status for Home Purchase Loan Applications
17. City of Lakewood
2004–2011 HMDA Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	Total
Owner-Occupied	1,358	1,566	1,449	953	766	804	648	568	8,112
Not Owner-Occupied	213	281	258	144	121	48	41	50	1,156
Not Applicable	21	24	7	7	3	4	7	4	77
Total	1,592	1,871	1,714	1,104	890	856	696	622	9,345

Table 17.C.3
Owner-Occupied Home Purchase Loan Applications by Loan Type
17. City of Lakewood
2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Conventional	1,228	1,422	1,329	835	430	325	240	191	6,000
FHA - Insured	118	132	112	109	314	449	390	351	1,975
VA - Guaranteed	12	12	8	9	22	30	18	26	137
Rural Housing Service or Farm Service Agency	0	0	0	0	0	0	0	0	0
Total	1,358	1,566	1,449	953	766	804	648	568	8,112

⁷¹ Data are considered “raw” because they contain entry errors and incomplete loan applications. Starting in 2004, the HMDA data made substantive changes in reporting. It modified the way it handled Hispanic data, loan interest rates, and the reporting of multifamily loan applications.

DENIAL RATES

Table 17.C.4
Loan Applications by Action Taken
 17. City of Lakewood
 2004–2011 HMDA Data

Action	2004	2005	2006	2007	2008	2009	2010	2011	Total
Loan Originated	812	908	807	547	414	403	339	286	4,516
Application Approved but not Accepted	88	95	84	57	27	14	17	13	395
Application Denied	110	157	155	69	68	48	54	37	698
Application Withdrawn by Applicant	95	92	79	44	51	39	25	33	458
File Closed for Incompleteness	24	31	22	11	8	7	8	2	113
Loan Purchased by the Institution	229	282	302	224	197	292	204	197	1,927
Preapproval Request Denied	0	1	0	1	1	1	1	0	5
Preapproval Approved but not Accepted	0	0	0	0	0	0	0	0	0
Total	1,358	1,566	1,449	953	766	804	648	568	8,112
Denial Rate	11.9%	14.7%	16.1%	11.2%	14.1%	10.6%	13.7%	11.5%	13.4%

Table 17.C.5
Denial Rates by Gender of Applicant
 17. City of Lakewood
 2004–2011 HMDA Data

Year	Male	Female	Not Available	Not Applicable	Average
2004	11.7%	10.0%	40.0%	.0%	11.9%
2005	14.0%	14.2%	32.5%	.0%	14.7%
2006	15.5%	14.4%	34.0%	%	16.1%
2007	11.5%	7.7%	42.1%	.0%	11.2%
2008	13.9%	14.9%	8.7%	50.0%	14.1%
2009	12.0%	5.3%	26.3%	%	10.6%
2010	13.3%	14.5%	14.3%	%	13.7%
2011	12.8%	7.0%	20.0%	%	11.5%
Average	13.2%	11.7%	29.0%	20.0%	13.4%

Table 17.C.6
Loan Applications by Selected Action Taken by Gender of Applicant
 17. City of Lakewood
 2004–2011 HMDA Data

Gender		2004	2005	2006	2007	2008	2009	2010	2011	Total
Male	Originated	535	584	519	354	255	264	215	177	2,903
	Denied	71	95	95	46	41	36	33	26	443
	Denial Rate	11.7%	14.0%	15.5%	11.5%	13.9%	12.0%	13.3%	12.8%	13.2%
Female	Originated	261	296	255	181	137	125	112	93	1,460
	Denied	29	49	43	15	24	7	19	7	193
	Denial Rate	10.0%	14.2%	14.4%	7.7%	14.9%	5.3%	14.5%	7.0%	11.7%
Not Available	Originated	15	27	33	11	21	14	12	16	149
	Denied	10	13	17	8	2	5	2	4	61
	Denial Rate	40.0%	32.5%	34.0%	42.1%	8.7%	26.3%	14.3%	20.0%	29.0%
Not Applicable	Originated	1	1	0	1	1	0	0	0	4
	Denied	0	0	0	0	1	0	0	0	1
	Denial Rate	.0%	.0%	%	.0%	50.0%	%	%	%	20.0%
Total	Originated	812	908	807	547	414	403	339	286	4,516
	Denied	110	157	155	69	68	48	54	37	698
	Denial Rate	11.9%	14.7%	16.1%	11.2%	14.1%	10.6%	13.7%	11.5%	13.4%

Table 17.C.7
Denial Rates by Race/Ethnicity of Applicant
 17. City of Lakewood
 2004–2011 HMDA Data

Race/Ethnicity	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	33.3%	.0%	.0%	.0%	.0%	%	%	%	9.1%
Asian	10.0%	23.5%	22.2%	.0%	16.7%	28.6%	22.2%	16.7%	19.2%
Black	30.8%	30.4%	37.7%	52.6%	66.7%	14.3%	22.2%	22.2%	37.3%
White	9.6%	12.6%	12.2%	9.7%	11.9%	9.5%	12.9%	10.9%	11.2%
Not Available	38.9%	33.3%	35.2%	14.6%	15.8%	24.0%	19.2%	12.5%	27.6%
Not Applicable	.0%	.0%	%	%	50.0%	0%	0%	%	20.0%
Average	11.9%	14.7%	16.1%	11.2%	14.1%	10.6%	13.7%	11.5%	13.4%
Non-Hispanic	9.9%	13.1%	14.1%	9.8%	14.1%	10.0%	11.8%	11.2%	11.9%
Hispanic	16.7%	12.5%	30.8%	40.0%	30.8%	.0%	63.6%	12.5%	26.2%

Table 17.C.8
Loan Applications by Selected Action Taken by Race/Ethnicity of Applicant
 17. City of Lakewood
 2004–2011 HMDA Data

Race		2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Originated	2	3	2	2	1	0	0	0	10
	Denied	1	0	0	0	0	0	0	0	1
	Denial Rate	33.3%	.0%	.0%	.0%	.0%	%	%	%	9.1%
Asian	Originated	9	13	14	5	5	5	7	5	63
	Denied	1	4	4	0	1	2	2	1	15
	Denial Rate	10.0%	23.5%	22.2%	.0%	16.7%	28.6%	22.2%	16.7%	19.2%
Black	Originated	18	16	38	9	5	6	7	7	106
	Denied	8	7	23	10	10	1	2	2	63
	Denial Rate	30.8%	30.4%	37.7%	52.6%	66.7%	14.3%	22.2%	22.2%	37.3%
White	Originated	748	819	696	496	370	373	304	246	4,052
	Denied	79	118	97	53	50	39	45	30	511
	Denial Rate	9.6%	12.6%	12.2%	9.7%	11.9%	9.5%	12.9%	10.9%	11.2%
Not Available	Originated	33	56	57	35	32	19	21	28	281
	Denied	21	28	31	6	6	6	5	4	107
	Denial Rate	38.9%	33.3%	35.2%	14.6%	15.8%	24.0%	19.2%	12.5%	27.6%
Not Applicable	Originated	2	1	0	0	1	0	0	0	4
	Denied	0	0	0	0	1	0	0	0	1
	Denial Rate	38.9%	33.3%	35.2%	14.6%	15.8%	24.0%	19.2%	12.5%	20.0%
Total	Originated	812	908	807	547	414	403	339	286	4,516
	Denied	110	157	155	69	68	48	54	37	698
	Denial Rate	11.9%	14.7%	16.1%	11.2%	14.1%	10.6%	13.7%	11.5%	13.4%
Non-Hispanic	Originated	720	827	742	514	372	380	315	253	4,123
	Denied	79	125	122	56	61	42	42	32	559
	Denial Rate	9.9%	13.1%	14.1%	9.8%	14.1%	10.0%	11.8%	11.2%	11.9%
Hispanic	Originated	10	14	9	3	9	6	4	7	62
	Denied	2	2	4	2	4	0	7	1	22
	Denial Rate	16.7%	12.5%	30.8%	40.0%	30.8%	.0%	63.6%	12.5%	26.2%

Table 17.C.9
Loan Applications by Reason for Denial
 17. City of Lakewood
 2004–2011 HMDA Data

Denial Reason	2004	2005	2006	2007	2008	2009	2010	2011	Total
Debt-to-Income Ratio	16	27	20	12	9	10	16	4	114
Employment History	1	2	2	0	5	0	2	0	12
Credit History	16	21	30	7	12	8	4	3	101
Collateral	8	16	17	13	15	21	10	15	115
Insufficient Cash	6	0	2	3	2	0	7	3	23
Unverifiable Information	4	15	2	2	3	1	5	0	32
Credit Application Incomplete	6	15	16	6	4	4	2	3	56
Mortgage Insurance Denied	0	0	0	0	0	0	0	0	0
Other	34	39	28	16	12	3	7	8	147
Missing	19	22	38	10	6	1	1	1	98
Total	110	157	155	69	68	48	54	37	698

Table 17.C.10
Denial Rates by Income of Applicant
 17. City of Lakewood
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	66.7%	50.0%	75.0%	.0%	%	33.3%	100.0%	100.0%	55.0%
\$15,001–\$30,000	20.7%	28.6%	32.2%	7.1%	20.0%	15.2%	21.3%	16.7%	21.8%
\$30,001–\$45,000	10.4%	15.3%	16.9%	18.7%	17.5%	11.7%	20.4%	8.8%	14.9%
\$45,001–\$60,000	14.9%	15.3%	16.3%	11.5%	15.3%	7.7%	9.3%	8.7%	13.4%
\$60,001–\$75,000	7.2%	13.1%	14.0%	10.4%	12.1%	13.8%	10.0%	6.5%	11.2%
Above \$75,000	8.1%	9.8%	12.2%	6.6%	9.4%	8.6%	6.4%	15.4%	9.6%
Data Missing	16.0%	18.0%	17.8%	22.2%	14.3%	.0%	57.1%	.0%	18.2%
Total	11.9%	14.7%	16.1%	11.2%	14.1%	10.6%	13.7%	11.5%	13.4%

Table 17.C.11
Denial Rates of Loans by Race/Ethnicity and Income of Applicant
 17. City of Lakewood
 2004–2011 HMDA Data

Race	<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	Above \$75K	Data Missing	Average
American Indian	%	.0%	33.3%	.0%	.0%	.0%	.0%	9.1%
Asian	%	30.0%	21.4%	28.6%	13.3%	12.0%	%	19.2%
Black	%	61.1%	42.4%	34.2%	22.2%	32.3%	.0%	37.3%
White	56.3%	17.6%	12.0%	11.2%	9.8%	8.7%	13.2%	11.2%
Not Available	50.0%	39.0%	29.5%	31.9%	21.2%	14.0%	64.7%	27.6%
Not Applicable	%	%	.0%	%	%	.0%	50.0%	20.0%
Average	55.0%	21.8%	14.9%	13.4%	11.2%	9.6%	18.2%	13.4%
Non-Hispanic Ethnicity	56.3%	19.3%	12.7%	12.2%	10.4%	9.2%	13.3%	11.9%
Hispanic (Ethnicity)	%	33.3%	52.2%	14.8%	8.3%	16.7%	.0%	26.2%

Table 17.C.12
Loan Applications by Reason for Denial by Race/Ethnicity of Applicant
 17. City of Lakewood
 2004–2011 HMDA Data

Denial Reason	American Indian	Asian	Black	White	Not Available	Not Applicable	Total	Hispanic (Ethnicity)
Debt-to-Income Ratio	1	6	8	78	21	0	114	4
Employment History	0	0	0	12	0	0	12	0
Credit History	0	2	9	80	9	1	101	0
Collateral	0	2	4	100	9	0	115	4
Insufficient Cash	0	1	1	18	3	0	23	2
Unverifiable Information	0	0	3	23	6	0	32	0
Credit Application Incomplete	0	1	0	44	11	0	56	0
Mortgage Insurance Denied	0	0	0	0	0	0	0	0
Other	0	3	20	99	25	0	147	3
Missing	0	0	18	57	23	0	98	9
Total	1	15	63	511	107	1	698	22
% Missing	.0%	.0%	28.6%	11.2%	21.5%	.0%	14.0%	40.9%

Table 17.C.13
Loan Applications by Income of Applicant: Originated and Denied
 17. City of Lakewood
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Loan Originated	2	1	1	3	0	2	0	0	9
	Application Denied	4	1	3	0	0	1	1	1	11
	Denial Rate	66.7%	50.0%	75.0%	.0%	%	33.3%	100.0%	100.0%	55.0%
\$15,001–\$30,000	Loan Originated	65	60	40	39	32	28	37	25	326
	Application Denied	17	24	19	3	8	5	10	5	91
	Denial Rate	20.7%	28.6%	32.2%	7.1%	20.0%	15.2%	21.3%	16.7%	21.8%
\$30,001–\$45,000	Loan Originated	206	222	177	113	99	128	74	62	1,081
	Application Denied	24	40	36	26	21	17	19	6	189
	Denial Rate	10.4%	15.3%	16.9%	18.7%	17.5%	11.7%	20.4%	8.8%	14.9%
\$45,001–\$60,000	Loan Originated	165	200	170	115	100	96	78	63	987
	Application Denied	29	36	33	15	18	8	8	6	153
	Denial Rate	14.9%	15.3%	16.3%	11.5%	15.3%	7.7%	9.3%	8.7%	13.4%
\$60,001–\$75,000	Loan Originated	129	126	129	86	51	50	45	43	659
	Application Denied	10	19	21	10	7	8	5	3	83
	Denial Rate	7.2%	13.1%	14.0%	10.4%	12.1%	13.8%	10.0%	6.5%	11.2%
Above \$75,000	Loan Originated	203	258	253	184	126	96	102	88	1,310
	Application Denied	18	28	35	13	13	9	7	16	139
	Denial Rate	8.1%	9.8%	12.2%	6.6%	9.4%	8.6%	6.4%	15.4%	9.6%
Data Missing	Loan Originated	42	41	37	7	6	3	3	5	144
	Application Denied	8	9	8	2	1	0	4	0	32
	Denial Rate	16.0%	18.0%	17.8%	22.2%	14.3%	.0%	57.1%	.0%	18.2%
Total	Loan Originated	812	908	807	547	414	403	339	286	4,516
	Application Denied	110	157	155	69	68	48	54	37	698
	Denial Rate	11.9%	14.7%	16.1%	11.2%	14.1%	10.6%	13.7%	11.5%	13.4%

Table 17.C.14
Loan Applications by Income and Race/Ethnicity of Applicant: Originated and Denied
 17. City of Lakewood
 2004–2011 HMDA Data

Race		<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	> \$75K	Data Missing	Total
American Indian	Loan Originated	0	1	2	4	1	1	1	10
	Application Denied	0	0	1	0	0	0	0	1
	Denial Rate	%	.0%	33.3%	.0%	.0%	.0%	.0%	9.1%
Asian	Loan Originated	0	7	11	10	13	22	0	63
	Application Denied	0	3	3	4	2	3	0	15
	Denial Rate	%	30.0%	21.4%	28.6%	13.3%	12.0%	%	19.2%
Black	Loan Originated	0	7	34	25	14	21	5	106
	Application Denied	0	11	25	13	4	10	0	63
	Denial Rate	%	61.1%	42.4%	34.2%	22.2%	32.3%	.0%	37.3%
White	Loan Originated	7	286	966	899	579	1,184	131	4,052
	Application Denied	9	61	132	113	63	113	20	511
	Denial Rate	56.3%	17.6%	12.0%	11.2%	9.8%	8.7%	13.2%	11.2%
Not Available	Loan Originated	2	25	67	49	52	80	6	281
	Application Denied	2	16	28	23	14	13	11	107
	Denial Rate	50.0%	39.0%	29.5%	31.9%	21.2%	14.0%	64.7%	27.6%
Not Applicable	Loan Originated	0	0	1	0	0	2	1	4
	Application Denied	0	0	0	0	0	0	1	1
	Denial Rate	%	%	.0%	%	%	.0%	50.0%	20.0%
Total	Loan Originated	9	326	1,081	987	659	1,310	144	4,516
	Application Denied	11	91	189	153	83	139	32	698
	Denial Rate	55.0%	21.8%	14.9%	13.4%	11.2%	9.6%	18.2%	13.4%
Non-Hispanic Ethnicity	Loan Originated	7	289	994	900	597	1,206	130	4,123
	Application Denied	9	69	145	125	69	122	20	559
	Denial Rate	56.3%	19.3%	12.7%	12.2%	10.4%	9.2%	13.3%	11.9%
Hispanic (Ethnicity)	Loan Originated	0	6	11	23	11	10	1	62
	Application Denied	0	3	12	4	1	2	0	22
	Denial Rate	%	33.3%	52.2%	14.8%	8.3%	16.7%	.0%	26.2%

PREDATORY LENDING

Table 17.C.15
Originated Owner-Occupied Loans by HAL Status
 17. City of Lakewood
 2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Other	736	731	639	490	382	386	337	286	3,987
HAL	76	177	168	57	32	17	2	0	529
Total	812	908	807	547	414	403	339	286	4,516
Percent HAL	9.4%	19.5%	20.8%	10.4%	7.7%	4.2%	.6%	.0%	11.7%

Table 17.C.16
Loans by Loan Purpose by HAL Status
 17. City of Lakewood
 2004–2011 HMDA Data

Loan Purpose		2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	Other	736	731	639	490	382	386	337	286	3,987
	HAL	76	177	168	57	32	17	2	0	529
	Percent HAL	9.4%	19.5%	20.8%	10.4%	7.7%	4.2%	.6%	.0%	11.7%
Home Improvement	Other	116	115	139	174	93	41	34	36	748
	HAL	15	17	24	20	12	8	4	0	100
	Percent HAL	11.5%	12.9%	14.7%	10.3%	11.4%	16.3%	10.5%	.0%	11.8%
Refinancing	Other	809	627	445	305	232	459	474	445	3,796
	HAL	134	192	172	79	29	21	0	2	629
	Percent HAL	14.2%	23.4%	27.9%	20.6%	11.1%	4.4%	.0%	.4%	14.2%
Total	Other	1,661	1,473	1,223	969	707	886	845	767	8,531
	HAL	225	386	364	156	32	17	2	0	1,258
	Percent HAL	11.9%	20.8%	22.9%	13.9%	9.4%	4.9%	.7%	.3%	12.9%

Table 17.C.17
HALs Originated by Race of Borrower
 17. City of Lakewood
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	0	0	0	1	0	0	0	0	1
Asian	1	2	2	0	1	1	0	0	7
Black	1	8	23	3	0	0	0	0	35
White	68	136	120	48	27	15	2	0	416
Not Available	6	31	23	5	4	1	0	0	70
Not Applicable	0	0	0	0	0	0	0	0	0
Total	76	177	168	57	32	17	2	0	529
Hispanic (Ethnicity)	2	2	2	0	1	1	0	0	8

Table 17.C.18
Rate of HALs Originated by Race/Ethnicity of Borrower
 17. City of Lakewood
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	.0%	.0%	.0%	50.0%	.0%	%	%	%	10.0%
Asian	11.1%	15.4%	14.3%	.0%	20.0%	20.0%	.0%	.0%	11.1%
Black	5.6%	50.0%	60.5%	33.3%	.0%	.0%	.0%	.0%	33.0%
White	9.1%	16.6%	17.2%	9.7%	7.3%	4.0%	.7%	.0%	10.3%
Not Available	18.2%	55.4%	40.4%	14.3%	12.5%	5.3%	.0%	.0%	24.9%
Not Applicable	.0%	.0%	%	%	.0%	%	%	%	0%
Average	9.4%	19.5%	20.8%	10.4%	7.7%	4.2%	0.6%	0.0%	11.7%
Non-Hispanic Ethnicity	8.9%	17.0%	19.0%	10.3%	7.0%	3.9%	.6%	%	%
Hispanic (Ethnicity)	20.0%	14.3%	22.2%	.0%	11.1%	16.7%	.0%	.0%	12.9%

Table 17.C.19
Loans by HAL Status by Race/Ethnicity of Borrower
 17. City of Lakewood
 2004–2011 HMDA Data

Race	Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Other	2	3	2	1	1	0	0	0	9
	HAL	0	0	0	1	0	0	0	0	1
	Percent HAL	.0%	.0%	.0%	50.0%	.0%	%	%	%	10.0%
Asian	Other	8	11	12	5	4	4	7	5	56
	HAL	1	2	2	0	1	1	0	0	7
	Percent HAL	11.1%	15.4%	14.3%	.0%	20.0%	20.0%	.0%	.0%	11.1%
Black	Other	17	8	15	6	5	6	7	7	71
	HAL	1	8	23	3	0	0	0	0	35
	Percent HAL	5.6%	50.0%	60.5%	33.3%	.0%	.0%	.0%	.0%	33.0%
White	Other	680	683	576	448	343	358	302	246	3,636
	HAL	68	136	120	48	27	15	2	0	416
	Percent HAL	9.1%	16.6%	17.2%	9.7%	7.3%	4.0%	0.7%	0.0%	10.3%
Not Available	Other	27	25	34	30	28	18	21	28	211
	HAL	6	31	23	5	4	1	0	0	70
	Percent HAL	18.2%	55.4%	40.4%	14.3%	12.5%	5.3%	.0%	.0%	24.9%
Not Applicable	Other	2	1	0	0	1	0	0	0	4
	HAL	0	0	0	0	0	0	0	0	0
	Percent HAL	.0%	.0%	%	%	.0%	%	%	%	0.0%
Total	Other	736	731	639	490	382	386	337	286	3,987
	HAL	76	177	168	57	32	17	2	0	529
	Percent HAL	9.4%	19.5%	20.8%	10.4%	7.7%	4.2%	.6%	.0%	11.7%
Non-Hispanic Ethnicity	Other	656	686	601	461	346	365	313	253	3,681
	HAL	64	141	141	53	26	15	2		
	Percent HAL	8.9%	17.0%	19.0%	10.3%	7.0%	3.9%	.6%	%	%
Hispanic (Ethnicity)	Other	8	12	7	3	8	5	4	7	54
	HAL	2	2	2	0	1	1	0	0	8
	Percent HAL	20.0%	14.3%	22.2%	.0%	11.1%	16.7%	.0%	.0%	12.9%

Table 17.C.20
Rates of HALs by Income of Borrower
 17. City of Lakewood
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Average
\$15,000 or Below	.0%	.0%	.0%	.0%	%	.0%	%	%	.0%
\$15,001–\$30,000	20.0%	28.3%	17.5%	10.3%	12.5%	3.6%	.0%	.0%	14.1%
\$30,001–\$45,000	11.2%	23.9%	23.2%	14.2%	11.1%	4.7%	2.7%	.0%	14.1%
\$45,001–\$60,000	10.9%	21.5%	25.9%	14.8%	8.0%	4.2%	.0%	.0%	13.6%
\$60,001–\$75,000	7.8%	18.3%	24.0%	14.0%	11.8%	4.0%	.0%	.0%	12.7%
Above \$75,000	5.4%	12.4%	13.0%	4.3%	2.4%	4.2%	0.0%	.0%	6.9%
Data Missing	2.4%	22.0%	32.4%	.0%	.0%	.0%	.0%	.0%	15.3%
Average	9.4%	19.5%	20.8%	10.4%	7.7%	4.2%	.6%	.0%	11.7%

Table 17.C.21
Loans by HAL Status by Income of Borrower
 17. City of Lakewood
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Other	2	1	1	3	0	2	0	0	9
	HAL	0	0	0	0	0	0	0	0	0
	Percent HAL	.0%	.0%	.0%	.0%	%	.0%	%	%	.0%
\$15,001–\$30,000	Other	52	43	33	35	28	27	37	25	280
	HAL	13	17	7	4	4	1	0	0	46
	Percent HAL	20.0%	28.3%	17.5%	10.3%	12.5%	3.6%	.0%	.0%	14.1%
\$30,001–\$45,000	Other	183	169	136	97	88	122	72	62	929
	HAL	23	53	41	16	11	6	2	0	152
	Percent HAL	11.2%	23.9%	23.2%	14.2%	11.1%	4.7%	2.7%	.0%	14.1%
\$45,001 – \$60,000	Other	147	157	126	98	92	92	78	63	853
	HAL	18	43	44	17	8	4	0	0	134
	Percent HAL	10.9%	21.5%	25.9%	14.8%	8.0%	4.2%	.0%	.0%	13.6%
\$60,001–\$75,000	Other	119	103	98	74	45	48	45	43	575
	HAL	10	23	31	12	6	2	0	0	84
	Percent HAL	7.8%	18.3%	24.0%	14.0%	11.8%	4.0%	.0%	.0%	12.7%
Above \$75,000	Other	192	226	220	176	123	92	102	88	1,219
	HAL	11	32	33	8	3	4	0	0	91
	Percent HAL	5.4%	12.4%	13.0%	4.3%	2.4%	4.2%	.0%	.0%	6.9%
Data Missing	Other	41	32	25	7	6	3	3	5	122
	HAL	1	9	12	0	0	0	0	0	22
	Percent HAL	2.4%	22.0%	32.4%	.0%	.0%	.0%	.0%	.0%	15.3%
Total	Other	736	731	639	490	382	386	337	286	3,987
	HAL	76	177	168	57	32	17	2	0	529
	Percent HAL	9.4%	19.5%	20.8%	10.4%	7.7%	4.2%	.6%	.0%	11.7%

D. CRA DATA

Additional data tables related to Community Reinvestment Act (CRA) data are presented in this section.

Table 17.D.1
Small Business Loans Originated: \$100,000 or Less by Tract MFI
 17. City of Lakewood
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000		55	547	80		682
2001		65	586	111		762
2002		50	642	90		782
2003		149	661	42		852
2004		130	659	33		822
2005		133	767	46		946
2006		177	1,201	59		1,437
2007		189	1,284	51		1,524
2008		135	925	51		1,111
2009		80	359	24		463
2010		86	343	18		447
2011		82	482	22		586
Total	0	1,331	8,456	627	0	10,414
Loan Amount (\$1,000s)						
2000		649	5,426	651		6,726
2001		711	4,719	916		6,346
2002		633	6,388	611		7,632
2003		1,289	6,361	168		7,818
2004		1,338	6,026	472		7,836
2005		2,017	8,817	502		11,336
2006		2,001	11,524	592		14,117
2007		2,440	12,499	580		15,519
2008		1,418	9,306	437		11,161
2009		1,033	4,073	273		5,379
2010		1,313	4,137	116		5,566
2011		1,054	6,582	552		8,188
Total	0	15,896	85,858	5,870	0	107,624

Table 17.D.2
Small Business Loans Originated: \$100,001 to \$250,000 by Tract MFI
 17. City of Lakewood
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000		2	9	2		13
2001		1	22	3		26
2002		3	20	1		24
2003		5	21	0		26
2004		6	26	1		33
2005		4	19	0		23
2006		5	13	0		18
2007		6	12	1		19
2008		0	16	0		16
2009		2	6	0		8
2010		3	12	0		15
2011		4	16	3		23
Total	0	41	192	11	0	244
Loan Amount (\$1,000s)						
2000		356	1,536	285		2,177
2001		125	3,812	525		4,462
2002		371	3,765	157		4,293
2003		1,032	4,053	0		5,085
2004		1,184	4,719	220		6,123
2005		747	3,899	0		4,646
2006		830	2,528	0		3,358
2007		912	2,211	200		3,323
2008		0	2,927	0		2,927
2009		411	944	0		1,355
2010		421	1,980	0		2,401
2011		688	2,724	515		3,927
Total	0	7,077	35,098	1,902	0	44,077

Table 17.D.3
Small Business Loans Originated: More than \$250,000 by Tract MFI
 17. City of Lakewood
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000		5	11	2		18
2001		6	16	2		24
2002		1	17	8		26
2003		5	21	0		26
2004		9	22	0		31
2005		6	20	0		26
2006		4	21	1		26
2007		6	10	1		17
2008		2	19	0		21
2009		3	8	0		11
2010		8	12	1		21
2011		4	14	0		18
Total	0	59	191	15	0	265
Loan Amount (\$1,000s)						
2000		2,652	5,912	1,138		9,702
2001		3,078	8,189	1,278		12,545
2002		500	11,162	4,622		16,284
2003		3,375	10,993	0		14,368
2004		4,129	13,395	0		17,524
2005		2,660	12,457	0		15,117
2006		2,382	11,661	400		14,443
2007		2,029	5,757	1,000		8,786
2008		800	9,806	0		10,606
2009		1,100	3,668	0		4,768
2010		4,081	8,409	400		12,890
2011		2,550	7,717	0		10,267
Total	0	29,336	109,126	8,838	0	147,300

Table 17.D.4
Small Business Loans to Businesses with Gross Annual Revenues of Less Than \$1 Million by Tract MFI
 17. City of Lakewood
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000		22	213	40		275
2001		37	269	41		347
2002		10	166	26		202
2003		52	232	6		290
2004		41	241	14		296
2005		68	416	21		505
2006		80	522	16		618
2007		85	529	13		627
2008		32	316	14		362
2009		25	141	13		179
2010		22	131	5		158
2011		25	247	10		282
Total	0	499	3,423	219	0	4,141
Loan Amount (\$1,000s)						
2000		1,410	7,630	1,830		10,870
2001		2,132	9,310	1,887		13,329
2002		260	8,350	3,504		12,114
2003		2,750	10,981	40		13,771
2004		2,537	12,103	588		15,228
2005		2,867	13,138	363		16,368
2006		1,131	12,127	260		13,518
2007		2,469	8,310	188		10,967
2008		462	10,132	171		10,765
2009		614	3,885	169		4,668
2010		501	5,930	78		6,509
2011		397	7,970	212		8,579
Total	0	17,530	109,866	9,290	0	136,686

E. COMPLAINT DATA

This section contains data regarding fair housing complaints, as provided by the U.S. Department of Housing and Urban Development (HUD), the Ohio Civil Rights Commission (OCRC), and the Fair Housing Contact Service (FHCS).

HUD COMPLAINTS

Table 17.E.1
Fair Housing Complaints by Basis
17. City of Lakewood
2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability	2	1	1	2	1		2		3	12
Family Status			2		1	11	3	7	2	26
National Origin	1	1					1			3
Race	1	2	1	3	2	4	3			16
Sex				1		1	2	1		5
Total Bases	4	4	4	6	4	16	11	8	5	62
Total Complaints	3	4	5	4	4	15	11	8	5	59

Table 17.E.2
Fair Housing Complaints by Issue
17. City of Lakewood
2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Discrimination in terms, conditions or privileges relating to rental			2	2		3	1	1		9
Failure to make reasonable accommodation	1			1	1		2		1	6
Discriminatory advertising, statements, and notices		1					2	2		5
Otherwise deny or make housing available			1			1	3			5
Discriminatory refusal to rent and negotiate for rental			1				2			3
Discriminatory terms, conditions, privileges, or services and facilities		1					1		1	3
Discriminatory acts under Section 818 (coercion, etc.)	1	1	1							3
Discriminatory advertisement - rental			1		1	9	1	5	3	20
False denial or representation of availability - rental					1		1			2
Steering					1		1			2
Discriminatory refusal to rent	2	2	1	2	2	4	4		2	19
Discriminatory financing (includes real estate transactions)			1							1
Discrimination in services and facilities relating to rental				1						1
Other discriminatory acts				1						1
Total Issues	4	5	8	7	6	17	18	8	7	80
Total Complaints	3	4	5	4	4	15	11	8	5	59

Table 17.E.3
Fair Housing Complaints by Closure Status
 17. City of Lakewood
 2004–2012 HUD Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Administrative Closure Cause (FHAP)		1			1	1		1		4
Conciliated / Settled	1	1	4	1	1	5	5	3	1	22
No Cause	2	1	1	3	2		2			11
Open								1	3	4
Total Complaints	3	4	5	4	4	15	11	8	5	59

HUD Complaints Found With Cause

Table 17.E.4
Fair Housing Complaints Found With Cause by Basis
 17. City of Lakewood
 2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability	1	1	1	1	1		1		1	7
Family Status			1			11	3	5	1	21
National Origin							1			1
Race		1	1	1		3	2			8
Sex						1	2	1		4
Total Bases	1	2	3	2	1	15	9	6	2	41
Total Complaints	1	2	4	1	1	14	9	6	2	40

Table 17.E.5
Fair Housing Complaints Found With Cause by Issue
 17. City of Lakewood
 2004–2012 HUD Data

Issue	2004-2012 HSD Data									
	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Discrimination in terms, conditions or privileges relating to rental			1	1		3	1	1		7
Failure to make reasonable accommodation				1	1		1		1	4
Discriminatory refusal to rent and negotiate for rental			1				2			3
Discriminatory advertising, statements, and notices							2	1		3
Otherwise deny or make housing available			1				2			3
Discriminatory acts under Section 818 (coercion, etc.)	1	1	1							3
Discriminatory terms, conditions, privileges, or services and facilities							1		1	2
Discriminatory advertisement - rental			1			9	1	4	1	16
Discriminatory refusal to rent	1	1			1	4	3			10
False denial or representation of availability - rental							1			1
Discriminatory financing (includes real estate transactions)			1							1
Steering							1			1
Other discriminatory acts				1						1
Total Issues	2	2	6	3	2	16	15	6	3	55
Total Complaints	1	2	4	1	1	14	9	6	2	40

OHIO CIVIL RIGHTS COMMISSION COMPLAINTS

Table 17.E.6
Fair Housing Complaints by Basis
 17. City of Lakewood
 2004–2012 OCRRC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color						1				1
Disability	1	1	1	2	1	1	2		1	10

Family Status			1		3	1	2	3		10
Gender			2			1				3
National Origin	1				1					2
Race		3	4	3	4	2	2		1	19
Religion				1						1
Retaliation		1	1	1					1	4
Total Bases	2	5	9	7	7	8	6	3	3	50
Total Complaints	2	4	6	4	6	7	6	3	2	40

Table 17.E.7
Fair Housing Complaints by Issue
 17. City of Lakewood
 2004–2012 OCR Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Advertising			1			1	1	2		5
Exclusion	2	1			3	2	1			9
Harassment		1		2		2				5
Intimidation		1								1
Other		3	3	3	1	2	3	1	1	17
Reasonable Accommodation					1		1		1	3
Terms and Conditions			2		1	3	1			7
Total Issues	2	6	6	5	6	10	7	3	2	47
Total Complaints	2	4	6	4	6	7	6	3	2	40

Table 17.E.8
Fair Housing Complaints by Closure Status
 17. City of Lakewood
 2004–2012 OCR Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Administrative Closure									1	1
CP Failed to Cooperate		1			1	2				4
CP Withdrawal – No Benefit					1					1
No Cause Finding Issued	1		2	4	2		2			11
Settlement With Benefits	1				2	4	1	1	1	10
Successful Conciliation		1					1			2
Withdrawal With Benefits		2	4			1	2	2		11
Total Complaints	2	4	6	4	6	7	6	3	2	40

FAIR HOUSING RESOURCE CENTER COMPLAINTS

Table 17.E.11

Fair Housing Complaints by Basis

17. City of Lakewood
2004– 2012 FHRC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability	1									1
Sex	1									1
Total Bases	2	0	0	0	0	0	0	0	0	2
Total Complaints	2									2

Table 17.E.12

Fair Housing Complaints by Issue Type

17. City of Lakewood
2004– 2012 FHRC Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Rental	2									2
Total	2	0	0	0	0	0	0	0	0	2

Table 17.E.13

Fair Housing Complaints by Closure Status

17. City of Lakewood
2004– 2012 FHRC Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Settled through counseling	2									2
Complaint filed in federal court										11
Total	2	0	0	0	0	0	0	0	0	2

THE HOUSING RESEARCH AND ADVOCACY CENTER

Table 17.E.14
Fair Housing Complaints by Basis

17 City of Lakewood
2004–2012 HRAC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability	1		1	2	2	1	3	1	6	17
Race	1	2	1	1	2	2	3		5	17
Familial Status		1			2			2	2	7
Color									5	5
Sex						1	1	1	1	4
Ethnicity									2	2
National Origin									2	2
Religion					1				1	2
Sexual Orientation							1	1		2
Criminal History				1						1
Gender						1				1
N.A.								1		1
Retaliation					1					1
Sexual Harassment						1				1
Source of Income					1					1
Total Bases	2	3	2	4	9	6	8	6	24	64
Total Complaints	2	3	2	4	8	5	7	6	13	50

Table 17.E.15
Fair Housing Complaints by Issue

17 City of Lakewood
2004–2012 HRAC Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Rental	2	2	1	4	8	4	7	6	12	46
Sale		1	1							2
Other						1			1	2
Total	2	3	2	4	8	5	7	6	13	50
Total Complaints	2	3	2	4	8	5	7	6	13	50

Table 17.E.16
Fair Housing Complaints by Action Taken

17 City of Lakewood
2004–2012 HRAC Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Referred to OCRC		3	1	1	5	2	6	1	7	26
Fair Housing Info Given				1	2	3	1	3	6	16
Reasonable Accommodation	1		1	1					3	6
HRAC Conducted Test		2	1		2					5
Referred to Attorney	1				1					2
Agency complaint with OCRC								1		1
Referred to ACLU				1						1
Total	2	5	3	4	10	5	7	5	16	57
Total Complaints	2	3	2	4	8	5	7	6	13	50

F. FAIR HOUSING SURVEY FOR HOUSING STAKEHOLDERS DATA

This section presents public involvement data gathered through the 2012–2013 Fair Housing Survey for Housing Stakeholders.

Table 17.F.1
Primary Role of Respondent

17. City of Lakewood
2012–2013 Fair Housing Survey for Housing
Stakeholders Data

Primary Role	Total
Advocate/Service Provider	1
Banking/Finance	1
Condo or Homeowner Association Leader	1
Construction/Development	1
Other Role	1
Total	5

FEDERAL, STATE, AND LOCAL LAWS

Table 17.F.2
Familiarity with Fair Housing Laws

17. City of Lakewood
2012–2013 Fair Housing Survey
for Housing Stakeholders Data

Familiarity	Total
Not Familiar	0
Somewhat Familiar	2
Very Familiar	1
Missing	2
Total	5

Table 17.F.3
Perceptions About Fair Housing Laws

17. City of Lakewood
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?	2	1	2	5
Are fair housing laws difficult to understand or follow?		3	2	5
Do you think fair housing laws should be changed?		2	3	5
Do you thing fair housing laws are adequately enforced?	2	1	2	5

Table 17.F.4
Fair Housing Activities
 17. City of Lakewood

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?	2	1		2	5	
Have you participated in fair housing training?	2			3	5	
Are you aware of any fair housing testing?		2	1	2	5	
Testing and education	Too Little	Right Amount	Too Much	Don't Know	Missing	Total
Is there sufficient outreach and education activity?		1		2	2	5
Is there sufficient testing?				3	2	5

Table 17.F.5
Protected Classes

17. City of Lakewood

2012–2013 Fair Housing Survey
 for Housing Stakeholders Data

Protected Class	Total
Family Status	2
Religion	2
Gender	2
National Origin	2
Color	1
Sexual Orientation	1
Other	1
Total	11

Table 17.F.6
Fair Housing Violation Referrals
 17. City of Lakewood
 2012–2013 Fair Housing Survey for
 Housing Stakeholders Data

Referral	Total
Housing Advocates, Inc.	1
Total	1

LOCAL FAIR HOUSING

Table 17.F.7
Local Fair Housing
 17. City of Lakewood
 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?	1		1	3	5
Are there any specific geographic areas that have fair housing problems?			2	3	5
Are there any specific groups in that face housing discrimination?			2	3	5

FAIR HOUSING IN THE PRIVATE SECTOR

Table 17.F.8
Barriers to Fair Housing in the Private Sector
 17. City of Lakewood
 2012–2013 Fair Housing Survey for Housing Stakeholders Data

Question	Yes	No	Don't Know	Missing	Total
Are you aware of any questionable practices or barriers to fair housing choice in:					
The rental housing market?		2		3	5
The real estate industry?		2		3	5
The mortgage and home lending industry?		2		3	5
The housing construction or accessible housing design fields?		2		3	5
The home insurance industry?		2		3	5
The home appraisal industry?		2		3	5
Any other housing services?		2		3	5

FAIR HOUSING IN THE PUBLIC SECTOR

Table 17.F.9
Barriers to Fair Housing in the Public Sector
 17. City of Lakewood
 2012–2013 Fair Housing Survey for Housing Stakeholders Data

Question	Yes	No	Don't Know	Missing	Total
Are you aware of any questionable practices or barriers to fair housing choice in:					
Land use policies?		2		3	5
Zoning laws?		2		3	5
Occupancy standards or health and safety codes?		2		3	5
Property tax policies?		2		3	5
Permitting process?		2		3	5
Housing construction standards?		2		3	5
Neighborhood or community development policies?		2		3	5
Limited access to government services, such as employment services?	1	1		3	5
Public administrative actions or regulations?		1	1	3	5

NARRATIVE COMMENTS

Federal, State, and Local Laws

Table 17.F.10

How did you become aware of fair housing laws?

17. City of Lakewood
2013 Fair Housing Survey Data

Comments:
25 years of working in the non-profit field of affordable housing Training through the City of Lakewood

Table 17.F.11

Are you aware of any barriers that limit access to government services, such as a lack of transportation or employment services?

17. City of Lakewood
2013 Fair Housing Survey Data

Comments:
RTA eliminated the circulator and reduced routes in community

G. LAND USE PLANNING SURVEY DATA

This section contains data regarding the potential effects of local land use and housing policies on fair housing choice, as gathered from the Land Use Planning Interview.

ENTITLEMENT COMMUNITY LAND USE PLANNING INTERVIEWS

In the Region's 18 entitlement cities and four entitlement counties, public sector policies were evaluated through individual telephone interviews that followed the structure of the 2012–2013 Fair Housing Survey for Government Officials, an online survey for nonentitlement community planning staff. This allowed for more thorough answers to the same key questions about public sector policies.

The appropriate planning and community development staff person or persons at these communities was solicited from members of the Progress Review Team, representing each entitlement community.

Table 17.G.1
Housing Development
 17. City of Lakewood
 2012 Land Use Planning Interview Data

Question: Does your jurisdiction...	Response
Housing Development	
Have a definition for the term "dwelling unit"?	Yes
Encourage or allocate funding for affordable housing development?	No
Have any potential barriers to the development of low- to moderate- income housing?	No
Occupancy Standards	
Have a definition for the term "family"?	Yes
Have any residential occupancy standards or limits?	Yes
Allow the mixed-use housing development?	Yes
Have any potential barriers to the development of mixed-use housing?	No
Special Needs Housing	
Have a definition for the term "disability"?	No
Have any particular standards/policies regarding accessible housing?	No
Have any special process for persons with disabilities to request variances for accessible housing?	No
Have any special standards for the development of senior housing?	Don't know
Distinguish senior citizen housing from other residential uses in any way?	Yes
Address group housing, or have any special policies for any other special needs housing?	Yes
Fair Housing Policies	
Have a fair housing ordinance, policy, or regulation?	Yes
Participate in any activities or practices for "affirmatively furthering fair housing"?	Yes

H. IMPEDIMENTS

The 2013 Northeast Ohio Regional Analysis of Impediments to Fair Housing Choice uncovered several potential issues regarding fair housing in the City of Lakewood. Identification of these items as probable impediments to fair housing choice was based on HUD's definition of impediments as actions, omissions, or decisions that restrict housing choice due to protected class status or actions, omissions, or decisions that have this effect. The identified impediments are supported by evidence uncovered during the Regional AI process, with impediments of higher need being those identified in multiple sources.

These probable impediments in the entirety of the Northeast Ohio Region are presented in **Volumes I and II** of the Regional AI. They are accompanied by suggested actions that jurisdictions in the Region may implement in order to alleviate or eliminate these impediments, and are accompanied by measurable objectives. The goal of these actions and measurable objectives is to assist these agencies in offering greater housing choice for all citizens of the Northeast Ohio Region.

The following list presents the private and public sector impediments found in the City of Lakewood.

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 in Lakewood.

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, including Lakewood.

Suggestion: Construct a regional 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 in Lakewood. 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 other local units of government as co-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 in Lakewood as well.

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 in Lakewood as well.

Suggestion: Construct a regional 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. The data implicated Lakewood as well. 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.

IMPEDIMENTS MATRIX

The matrix on the following page includes the impediment, data source, or sources that indicated its existence, protected classes most affected, and ranking of need for action. Level of need for action was determined based on the number of data sources that identified each impediment.

Table 17.H.1
Impediments Matrix
 17. City of Lakewood
 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 ⁷²			
Private Sector													
1	Denial of available housing units in the rental markets		X				X	X				Black and Hispanic persons	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				Disabled persons	L
Public Sector													
1	Lack of sufficient fair housing policies or practices by several units of local government							X				All	L
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		All	M
5	Decisions regarding definitions of "family," "dwelling unit," and related terms									X		Disabled persons, families	L
6	Lack of inclusionary policies							X		X		All	M

⁷² 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.

18. CITY OF PARMA

A. CENSUS BUREAU DATA

This section contains additional data from the U.S. Census Bureau.

Table 18.A.1

Population by Age

18. City of Parma

2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Under 5	4,957	5.8%	4,491	5.5%	-9.4%
5 to 19	15,920	18.6%	14,220	17.4%	-10.7%
20 to 24	4,215	4.9%	4,922	6.0%	16.8%
25 to 34	11,792	13.8%	10,595	13.0%	-10.2%
35 to 54	24,357	28.4%	22,736	27.9%	-6.7%
55 to 64	7,621	8.9%	10,234	12.5%	34.3%
65 or Older	16,793	19.6%	14,403	17.7%	-14.2%
Total	85,655	100.0%	81,601	100.0%	-4.7%

Table 18.A.2

Elderly Population by Age

18. City of Parma

2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
65 to 66	1,370	8.2%	1,344	9.3%	-1.9%
67 to 69	2,168	12.9%	2,115	14.7%	-2.4%
70 to 74	4,169	24.8%	2,929	20.3%	-29.7%
75 to 79	4,296	25.6%	2,666	18.5%	-37.9%
80 to 84	2,809	16.7%	2,540	17.6%	-9.6%
85 or Older	1,981	11.8%	2,809	19.5%	41.8%
Total	16,793	100.0%	14,403	100.0%	-14.2%

Table 18.A.3

Population by Race and Ethnicity

18. City of Parma

2000 & 2010 Census SF1 Data

Race	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
White	81,948	95.7%	75,921	93.0%	-7.4%
Black	905	1.1%	1,887	2.3%	108.5%
American Indian	118	.1%	151	.2%	28.0%
Asian	1,349	1.6%	1,511	1.9%	12.0%
Native Hawaiian/ Pacific Islander	17	.0%	13	.0%	-23.5%
Other	384	.4%	834	1.0%	117.2%
Two or More Races	934	1.1%	1,284	1.6%	37.5%
Total	85,655	100.0%	81,601	100.0%	-4.7%
Non-Hispanic	84,332	98.5	78,686	96.4%	-6.7%
Hispanic	1,323	1.5%	2,915	3.6%	120.3%

Table 18.A.4
Disability by Age
 18. City of Parma
 2010 Three-Year ACS Data

Age	Male		Female		Total	
	Disabled Population	Disability Rate	Disabled Population	Disability Rate	Disabled Population	Disability Rate
Under 5	48	2.0%	20	.9%	68	1.5%
5 to 17	572	9.3%	379	6.7%	951	8.1%
18 to 34	609	6.8%	423	5.4%	1,032	6.1%
35 to 64	2,112	12.8%	2,013	11.5%	4,125	12.1%
65 to 74	586	20.9%	884	23.4%	1,470	22.3%
75 or Older	1,337	46.5%	2,021	49.2%	3,358	48.1%
Total	5,264	13.3%	5,740	14.0%	11,004	13.6%

Table 18.A.5
Employment Status by Disability and Type: Age 18 to 64
 18. City of Parma
 2010 Three-Year ACS Data

Disability Status	Population
Employed:	39,027
With a disability:	2,288
With a hearing difficulty	721
With a vision difficulty	498
With a cognitive difficulty	551
With an ambulatory difficulty	774
With a self-care difficulty	334
With an independent living difficulty	689
No disability	36,739
Unemployed:	3,406
With a disability:	508
With a hearing difficulty	105
With a vision difficulty	18
With a cognitive difficulty	192
With an ambulatory difficulty	215
With a self-care difficulty	187
With an independent living difficulty	118
No disability	2,898
Not in labor force:	8,393
With a disability:	2,361
With a hearing difficulty	289
With a vision difficulty	321
With a cognitive difficulty	1,145
With an ambulatory difficulty	1,396
With a self-care difficulty	627
With an independent living difficulty	1,188
No disability	6,032
Total	50,826

Table 18.A.6
Households by Income

18. City of Parma
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	3,894	11.1%	3,143	9.4%
\$15,000 to \$19,999	2,312	6.6%	2,047	6.1%
\$20,000 to \$24,999	2,345	6.7%	2,287	6.8%
\$25,000 to \$34,999	4,842	13.8%	3,878	11.6%
\$35,000 to \$49,999	6,848	19.5%	5,822	17.3%
\$50,000 to \$74,999	8,377	23.8%	7,344	21.9%
\$75,000 to \$99,999	3,984	11.3%	4,704	14.0%
\$100,000 or More	2,576	7.3%	4,345	12.9%
Total	35,178	100.0%	33,570	100.0%

Table 18.A.7
Poverty by Age

18. City of Parma
2000 Census SF3 & 2010 Five-Year ACS Data

Age	2000 Census		2010 Five-Year ACS	
	Persons in Poverty	% of Total	Persons in Poverty	% of Total
Under 6	428	10.3%	711	11.7%
6 to 17	852	20.5%	1,068	17.5%
18 to 64	2,250	54.1%	3,581	58.7%
65 or Older	627	15.1%	743	12.2%
Total	4,157	100.0%	6,103	100.0%
Poverty Rate	4.9%	.	7.5%	.

Table 18.A.8
Households by Year Home Built

18. City of Parma
2000 Census SF3 & 2010 Five-Year ACS Data

Year Built	2000 Census		2010 Five-Year ACS	
	Households	% of Total	Households	% of Total
1939 or Earlier	3,422	9.7%	3,277	9.8%
1940 to 1949	4,178	11.9%	3,154	9.4%
1950 to 1959	13,373	38.1%	13,374	39.8%
1960 to 1969	7,097	20.2%	6,903	20.6%
1970 to 1979	4,236	12.1%	3,256	9.7%
1980 to 1989	1,620	4.6%	1,501	4.5%
1990 to 1999	1,200	3.4%	1,360	4.1%
2000 to 2004	.	.	490	1.5%
2005 or Later	.	.	255	.8%
Total	35,126	100.0%	33,570	100.0%

Table 18.A.9
Housing Units by Type

18. City of Parma
2000 Census SF3 & 2010 Five-Year ACS Data

Unit Type	2000 Census		2010 Five-Year ACS	
	Units	% of Total	Units	% of Total
Single-Family	28,998	79.6%	28,676	79.4%
Duplex	1,261	3.5%	1,236	3.4%
Tri- or Four-Plex	145	.4%	211	.6%
Apartment	5,977	16.4%	5,918	16.4%
Mobile Home	33	.1%	63	.2%
Boat, RV, Van, Etc.	0	.0%	0	.0%
Total	36,414	100.0%	36,104	100.0%

Table 18.A.10
Housing Units by Tenure

18. City of Parma
2000 & 2010 Census SF1 Data

Tenure	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
Occupied Housing Units	35,126	96.5%	34,489	94.2%	-1.8%
Owner-Occupied	27,212	77.5%	25,576	74.2%	-6.0%
Renter-Occupied	7,914	22.5%	8,913	25.8%	12.6%
Vacant Housing Units	1,288	3.5%	2,119	5.8%	64.5%
Total Housing Units	36,414	100.0%	36,608	100.0%	.5%

Table 18.A.11
Disposition of Vacant Housing Units

18. City of Parma
2000 & 2010 Census SF1 Data

Disposition	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
For Rent	617	47.9%	847	40.0%	37.3%
For Sale	215	16.7%	434	20.5%	101.9%
Rented or Sold, Not Occupied	118	9.2%	88	4.2%	-25.4%
For Seasonal, Recreational, or Occasional Use	81	6.3%	94	4.4%	16.0%
For Migrant Workers	1	0.1%	0	.0%	-100.0%
Other Vacant	256	19.9%	656	31.0%	156.3%
Total	1,288	100.0%	2,119	100.0%	64.5%

Table 18.A.12
Households by Household Size

18. City of Parma
2000 & 2010 Census SF1 Data

Size	2000 Census		2010 Census		% Change 00-10
	Households	% of Total	Households	% of Total	
One Person	10,269	29.2%	10,978	31.8%	6.9%
Two Persons	11,895	33.9%	11,472	33.3%	-3.6%
Three Persons	5,505	15.7%	5,374	15.6%	-2.4%
Four Persons	4,597	13.1%	4,146	12.0%	-9.8%
Five Persons	2,022	5.8%	1,655	4.8%	-18.2%
Six Persons	629	1.8%	587	1.7%	-6.7%
Seven Persons or More	209	.6%	277	.8%	32.5%
Total	35,126	100.0%	34,489	100.0%	-1.8%

Table 18.A.13
Household Type by Tenure
 18. City of Parma
 2000 & 2010 Census SF1 Data

Household Type	2000 Census		2010 Census		% Change 00–10
	Households	% of Total	Households	% of Total	
Family Households	23,333	66.4%	21,646	62.8%	-7.2%
Married-Couple Family	18,498	79.3%	15,767	72.8%	-14.8%
Owner-Occupied	16,519	89.3%	13,824	87.7%	-16.3%
Renter-Occupied	1,979	10.7%	1,943	12.3%	-1.8%
Other Family	4,835	20.7%	5,879	27.2%	21.6%
Male Householder, No Spouse	1,241	25.7%	1,586	27.0%	27.8%
Owner-Occupied	896	72.2%	1,059	66.8%	18.2%
Renter-Occupied	345	27.8%	527	33.2%	52.8%
Female Householder, No Spouse	3,594	74.3%	4,293	73.0%	19.4%
Owner-Occupied	2,440	67.9%	2,591	60.4%	6.2%
Renter-Occupied	1,154	32.1%	1,702	39.6%	47.5%
Non-Family Households	11,793	33.6%	12,843	37.2%	8.9%
Owner-Occupied	7,357	62.4%	8,102	63.1%	10.1%
Renter-Occupied	4,436	37.6%	4,741	36.9%	6.9%
Total	35,126	100.0%	34,489	100.0%	-1.8%

Table 18.A.14
Group Quarters Population
 18. City of Parma
 2000 & 2010 Census SF1 Data

Group Quarters Type	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Institutionalized					
Correctional Institutions	7	.6%	12	1.3%	71.4%
Juvenile Facilities	.	.	83	9.3%	.
Nursing Homes	979	85.5%	792	88.3%	-19.1%
Other Institutions	159	13.9%	10	1.1%	-93.7%
Total	1,145	100.0%	897	100.0%	-21.7%
Noninstitutionalized					
College Dormitories	0	.0%	0	.0%	%
Military Quarters	0	.0%	0	.0%	%
Other Noninstitutional	79	100.0%	166	100.0%	110.1%
Total	79	6.5%	166	15.6%	110.1%
Total Group Quarters Population	1,224	100.0%	1,063	100.0%	-13.2%

Table 18.A.15
Overcrowding and Severe Overcrowding
 18. City of Parma
 2000 Census SF3 & 2010 Five-Year ACS Data

Data Source	No Overcrowding		Overcrowding		Severe Overcrowding		Total
	Households	% of Total	Households	% of Total	Households	% of Total	
Owner							
2000 Census	27,016	99.2%	184	.7%	22	.1%	27,222
2010 ACS	25,501	99.5%	134	.5%	0	.0%	25,635
Renter							
2000 Census	7,641	96.7%	175	2.2%	88	1.1%	7,904
2010 ACS	7,770	97.9%	157	2.0%	8	.1%	7,935
Total							
2000 Census	34,657	98.7%	359	1.0%	110	.3%	35,126
2010 ACS	33,271	99.1%	291	.9%	8	.0%	33,570

Table 18.A.16
Households with Incomplete Plumbing Facilities
 18. City of Parma
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Plumbing Facilities	35,023	33,477
Lacking Complete Plumbing Facilities	103	93
Total Households	35,126	33,570
Percent Lacking	.3%	.3%

Table 18.A.17
Households with Incomplete Kitchen Facilities
 18. City of Parma
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Kitchen Facilities	35,058	33,396
Lacking Complete Kitchen Facilities	68	174
Total Households	35,126	33,570
Percent Lacking	.2%	.5%

Table 18.A.18
Cost Burden and Severe Cost Burden by Tenure
 18. City of Parma
 2000 Census & 2010 Five-Year ACS Data

Data Source	Less Than 30%		31%-50%		Above 50%		Not Computed		Total
	Households	% of Total	Households	% of Total	Households	% of Total	Households	% of Total	
Owner With a Mortgage									
2000 Census	11,726	74.8%	2,805	17.9%	1,117	7.1%	37	.2%	15,685
2010 ACS	10,858	67.9%	3,262	20.4%	1,843	11.5%	23	.1%	15,986
Owner Without a Mortgage									
2000 Census	9,377	89.0%	703	6.7%	369	3.5%	82	.8%	10,531
2010 ACS	7,816	81.0%	1,282	13.3%	472	4.9%	79	.8%	9,649
Renter									
2000 Census	4,945	62.6%	1,483	18.8%	970	12.3%	502	6.4%	7,900
2010 ACS	3,943	49.7%	2,068	26.1%	1,546	19.5%	378	4.8%	7,935
Total									
2000 Census	26,048	76.4%	4,991	14.6%	2,456	7.2%	621	1.8%	34,116
2010 ACS	22,617	67.4%	6,612	19.7%	3,861	11.5%	480	1.4%	33,570

Table 18.A.19
Median Housing Costs
 18. City of Parma
 2000 Census SF3 & 2010 Five-Year ACS Data

Housing Cost	2000 Census	2010 ACS
Median Contract Rent	\$534	\$620
Median Home Value	\$113,500	\$130,600

B. BLS DATA

This section contains Bureau of Labor Statistics (BLS) data that address employment and income.

Table 18.B.1
Labor Force Statistics
 18. City of Parma
 1990–2011 BLS Data

Year	Labor Force	Employment	Unemployment	Unemployment Rate	Statewide Unemployment Rate
1990	44,168	42,988	1,180	2.7%	5.7%
1991	43,033	41,667	1,366	3.2%	6.6%
1992	43,246	41,619	1,627	3.8%	7.4%
1993	43,813	42,246	1,567	3.6%	6.7%
1994	44,386	42,952	1,434	3.2%	5.6%
1995	44,691	43,553	1,138	2.5%	4.9%
1996	44,886	43,855	1,031	2.3%	5.0%
1997	45,444	44,444	1,000	2.2%	4.6%
1998	45,800	44,870	930	2.0%	4.3%
1999	46,121	45,176	945	2.0%	4.3%
2000	44,966	43,773	1,193	2.7%	4.0%
2001	44,719	43,410	1,309	2.9%	4.4%
2002	44,185	42,547	1,638	3.7%	5.7%
2003	44,070	41,607	2,463	5.6%	6.2%
2004	43,301	40,897	2,404	5.6%	6.1%
2005	42,766	40,370	2,396	5.6%	5.9%
2006	42,286	40,012	2,274	5.4%	5.4%
2007	42,338	39,757	2,581	6.1%	5.6%
2008	42,016	39,159	2,857	6.8%	6.5%
2009	41,165	37,333	3,832	9.3%	10.1%
2010	43,142	39,264	3,878	9.0%	10.0%
2011	43,029	39,783	3,246	7.5%	8.6%

C. HMDA DATA

The Home Mortgage Disclosure Act (HMDA) requires both depository and non-depository lenders to collect and publicly disclose information about housing-related loans and loan applications.⁷³ The information presented in this section presents detailed HMDA data, including denial rates and predatory lending including high annual percentage rate (APR) loans.

Table 18.C.1
Purpose of Loan by Year
18. City of Parma
2004–2011 HMDA Data

Purpose	2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	2,398	2,638	2,712	1,545	1,443	1,292	1,026	1,000	14,054
Home Improvement	531	648	694	707	519	325	252	228	3,904
Refinancing	4,115	4,151	3,290	2,516	1,746	2,050	1,908	1,709	21,485
Total	7,044	7,437	6,696	4,768	3,708	3,667	3,186	2,937	39,443

Table 18.C.2
Occupancy Status for Home Purchase Loan Applications
18. City of Parma
2004–2011 HMDA Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	Total
Owner-Occupied	2,193	2,454	2,415	1,384	1,313	1,250	971	927	12,907
Not Owner-Occupied	183	179	296	161	129	42	54	71	1,115
Not Applicable	22	5	1	0	1	0	1	2	32
Total	2,398	2,638	2,712	1,545	1,443	1,292	1,026	1,000	14,054

Table 18.C.3
Owner-Occupied Home Purchase Loan Applications by Loan Type
18. City of Parma
2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Conventional	1,810	2,151	2,157	1,157	566	346	289	267	8,743
FHA - Insured	343	276	223	192	699	823	646	615	3,817
VA - Guaranteed	40	27	35	35	48	79	36	45	345
Rural Housing Service or Farm Service Agency	0	0	0	0	0	2	0	0	2
Total	2,193	2,454	2,415	1,384	1,313	1,250	971	927	12,907

⁷³ Data are considered “raw” because they contain entry errors and incomplete loan applications. Starting in 2004, the HMDA data made substantive changes in reporting. It modified the way it handled Hispanic data, loan interest rates, and the reporting of multifamily loan applications.

DENIAL RATES

Table 18.C.4
Loan Applications by Action Taken
 18. City of Parma
 2004–2011 HMDA Data

Action	2004	2005	2006	2007	2008	2009	2010	2011	Total
Loan Originated	1,325	1,442	1,272	757	712	636	496	453	7,093
Application Approved but not Accepted	99	121	120	63	42	24	23	18	510
Application Denied	192	217	236	121	96	64	40	74	1,040
Application Withdrawn by Applicant	92	100	121	42	54	44	53	51	557
File Closed for Incompleteness	34	35	47	22	11	8	11	3	171
Loan Purchased by the Institution	451	537	617	379	396	473	348	328	3,529
Preapproval Request Denied	0	2	2	0	2	1	0	0	7
Preapproval Approved but not Accepted	0	0	0	0	0	0	0	0	0
Total	2,193	2,454	2,415	1,384	1,313	1,250	971	927	12,907
Denial Rate	12.7%	13.1%	15.6%	13.8%	11.9%	9.1%	7.5%	14.0%	12.8%

Table 18.C.5
Denial Rates by Gender of Applicant
 18. City of Parma
 2004–2011 HMDA Data

Year	Male	Female	Not Available	Not Applicable	Average
2004	10.5%	13.8%	44.0%	%	12.7%
2005	11.7%	15.2%	20.0%	%	13.1%
2006	13.6%	19.0%	20.8%	.0%	15.6%
2007	14.3%	11.6%	25.9%	%	13.8%
2008	11.9%	10.9%	25.0%	%	11.9%
2009	9.8%	7.2%	20.0%	%	9.1%
2010	5.7%	9.2%	25.0%	%	7.5%
2011	13.6%	14.4%	21.4%	%	14.0%
Average	11.7%	13.7%	26.7%	.0%	12.8%

Table 18.C.6
Loan Applications by Selected Action Taken by Gender of Applicant
 18. City of Parma
 2004–2011 HMDA Data

Gender		2004	2005	2006	2007	2008	2009	2010	2011	Total
Male	Originated	886	951	810	486	461	404	317	293	4,608
	Denied	104	126	127	81	62	44	19	46	609
	Denial Rate	10.5%	11.7%	13.6%	14.3%	11.9%	9.8%	5.7%	13.6%	11.7%
Female	Originated	411	451	423	251	236	220	167	149	2,308
	Denied	66	81	99	33	29	17	17	25	367
	Denial Rate	13.8%	15.2%	19.0%	11.6%	10.9%	7.2%	9.2%	14.4%	13.7%
Not Available	Originated	28	40	38	20	15	12	12	11	176
	Denied	22	10	10	7	5	3	4	3	64
	Denial Rate	44.0%	20.0%	20.8%	25.9%	25.0%	20.0%	25.0%	21.4%	26.7%
Not Applicable	Originated	0	0	1	0	0	0	0	0	1
	Denied	0	0	0	0	0	0	0	0	0
	Denial Rate	%	%	.0%	%	%	%	%	%	.0%
Total	Originated	1,325	1,442	1,272	757	712	636	496	453	7,093
	Denied	192	217	236	121	96	64	40	74	1,040
	Denial Rate	12.7%	13.1%	15.6%	13.8%	11.9%	9.1%	7.5%	14.0%	12.8%

Table 18.C.7
Denial Rates by Race/Ethnicity of Applicant
 18. City of Parma
 2004–2011 HMDA Data

Race/Ethnicity	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	.0%	66.7%	.0%	20.0%	.0%	.0%	50.0%	.0%	16.0%
Asian	18.5%	9.5%	5.3%	21.1%	9.1%	14.3%	14.3%	33.3%	15.4%
Black	28.6%	36.1%	65.4%	53.3%	33.3%	14.3%	28.6%	28.6%	41.3%
White	11.1%	11.8%	14.4%	12.1%	10.8%	8.7%	6.4%	12.7%	11.5%
Not Available	31.7%	20.5%	22.5%	23.2%	25.0%	16.2%	14.7%	25.9%	23.3%
Not Applicable	.0%	%	.0%	%	%	0%	0%	%	.0%
Average	12.7%	13.1%	15.6%	13.8%	11.9%	9.1%	7.5%	14.0%	12.8%
Non-Hispanic	10.2%	12.4%	14.9%	13.2%	10.8%	8.7%	6.4%	13.4%	11.7%
Hispanic	25.0%	14.3%	20.5%	.0%	21.7%	8.0%	5.9%	19.0%	15.8%

Table 18.C.8
Loan Applications by Selected Action Taken by Race/Ethnicity of Applicant
 18. City of Parma
 2004–2011 HMDA Data

Race		2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Originated	4	1	6	4	2	2	1	1	21
	Denied	0	2	0	1	0	0	1	0	4
	Denial Rate	.0%	66.7%	.0%	20.0%	.0%	50.0%	50.0%	.0%	16.0%
Asian	Originated	22	19	18	15	10	6	6	8	104
	Denied	5	2	1	4	1	1	1	4	19
	Denial Rate	18.5%	9.5%	5.3%	21.1%	9.1%	14.3%	14.3%	33.3%	15.4%
Black	Originated	10	23	9	7	6	6	5	5	71
	Denied	4	13	17	8	3	1	2	2	50
	Denial Rate	28.6%	36.1%	65.4%	53.3%	33.3%	14.3%	28.6%	28.6%	41.3%
White	Originated	1,215	1,302	1,159	688	658	591	455	419	6,487
	Denied	151	175	195	95	80	56	31	61	844
	Denial Rate	11.1%	11.8%	14.4%	12.1%	10.8%	8.7%	6.4%	12.7%	11.5%
Not Available	Originated	69	97	79	43	36	31	29	20	404
	Denied	32	25	23	13	12	6	5	7	123
	Denial Rate	31.7%	20.5%	22.5%	23.2%	25.0%	16.2%	14.7%	25.9%	23.3%
Not Applicable	Originated	5	0	1	0	0	0	0	0	6
	Denied	0	0	0	0	0	0	0	0	0
	Denial Rate	31.7%	20.5%	22.5%	23.2%	25.0%	16.2%	14.7%	25.9%	.0%
Total	Originated	1,325	1,442	1,272	757	712	636	496	453	7,093
	Denied	192	217	236	121	96	64	40	74	1,040
	Denial Rate	12.7%	13.1%	15.6%	13.8%	11.9%	9.1%	7.5%	14.0%	12.8%
Non-Hispanic	Originated	1,151	1,294	1,156	696	660	586	451	413	6,407
	Denied	131	183	202	106	80	56	31	64	853
	Denial Rate	10.2%	12.4%	14.9%	13.2%	10.8%	8.7%	6.4%	13.4%	11.7%
Hispanic	Originated	24	36	31	16	18	23	16	17	181
	Denied	8	6	8	0	5	2	1	4	34
	Denial Rate	25.0%	14.3%	20.5%	.0%	21.7%	8.0%	5.9%	19.0%	15.8%

Table 18.C.9
Loan Applications by Reason for Denial
 18. City of Parma
 2004–2011 HMDA Data

Denial Reason	2004	2005	2006	2007	2008	2009	2010	2011	Total
Debt-to-Income Ratio	28	41	28	24	17	13	9	17	177
Employment History	6	2	1	2	0	3	2	4	20
Credit History	49	49	46	30	23	15	14	13	239
Collateral	6	7	20	12	15	14	9	15	98
Insufficient Cash	3	3	3	3	3	6	1	2	24
Unverifiable Information	10	10	12	4	5	1	1	3	46
Credit Application Incomplete	18	21	19	12	7	5	1	14	97
Mortgage Insurance Denied	0	0	0	1	0	0	0	0	1
Other	38	44	45	16	10	4	3	3	163
Missing	34	40	62	17	16	3	0	3	175
Total	192	217	236	121	96	64	40	74	1,040

Table 18.C.10
Denial Rates by Income of Applicant
 18. City of Parma
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	20.0%	50.0%	28.6%	100.0%	50.0%	44.4%	50.0%	100.0%	50.0%
\$15,001–\$30,000	19.0%	16.5%	21.7%	16.5%	19.3%	8.6%	9.6%	14.0%	15.7%
\$30,001–\$45,000	13.7%	12.4%	13.3%	12.3%	9.6%	9.0%	5.2%	13.5%	11.8%
\$45,001–\$60,000	8.2%	14.4%	18.0%	14.1%	11.4%	7.3%	5.3%	13.3%	12.4%
\$60,001–\$75,000	15.1%	9.1%	10.7%	9.3%	10.0%	13.7%	2.0%	5.8%	10.4%
Above \$75,000	10.6%	12.1%	18.1%	16.5%	12.2%	3.6%	11.4%	17.6%	13.5%
Data Missing	11.7%	10.8%	12.1%	14.3%	10.0%	40.0%	66.7%	25.0%	13.9%
Total	12.7%	13.1%	15.6%	13.8%	11.9%	9.1%	7.5%	14.0%	12.8%

Table 18.C.11
Denial Rates of Loans by Race/Ethnicity and Income of Applicant
 18. City of Parma
 2004–2011 HMDA Data

Race	<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	Above \$75K	Data Missing	Average
American Indian	%	.0%	44.4%	.0%	.0%	.0%	.0%	16.0%
Asian	100.0%	16.7%	7.1%	10.7%	29.4%	25.0%	.0%	15.4%
Black	100.0%	66.7%	37.8%	41.7%	23.5%	42.9%	.0%	41.3%
White	47.4%	13.8%	10.7%	11.2%	9.5%	12.1%	12.0%	11.5%
Not Available	50.0%	31.7%	22.2%	22.6%	13.9%	21.5%	37.5%	23.3%
Not Applicable	%	%	.0%	.0%	%	%	%	.0%
Average	50.0%	15.7%	11.8%	12.4%	10.4%	13.5%	13.9%	12.8%
Non-Hispanic Ethnicity	48.6%	14.0%	10.6%	11.7%	10.0%	12.9%	11.1%	11.7%
Hispanic (Ethnicity)	50.0%	23.5%	17.4%	9.1%	15.4%	7.4%	33.3%	15.8%

Table 18.C.12
Loan Applications by Reason for Denial by Race/Ethnicity of Applicant

18. City of Parma
 2004–2011 HMDA Data

Denial Reason	American Indian	Asian	Black	White	Not Available	Not Applicable	Total	Hispanic (Ethnicity)
Debt-to-Income Ratio	0	6	5	150	16	0	177	5
Employment History	0	0	0	17	3	0	20	1
Credit History	2	4	15	196	22	0	239	11
Collateral	0	1	1	88	8	0	98	0
Insufficient Cash	1	0	0	18	5	0	24	2
Unverifiable Information	0	0	4	37	5	0	46	0
Credit Application Incomplete	0	4	7	78	8	0	97	7
Mortgage Insurance Denied	0	0	0	1	0	0	1	0
Other	1	2	8	137	15	0	163	6
Missing	0	2	10	122	41	0	175	2
Total	4	19	50	844	123	0	1,040	34
% Missing	.0%	10.5%	20.0%	14.5%	33.3%	%	16.8%	5.9%

Table 18.C.13
Loan Applications by Income of Applicant: Originated and Denied

18. City of Parma
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Loan Originated	4	4	5	0	1	5	4	0	23
	Application Denied	1	4	2	3	1	4	4	4	23
	Denial Rate	20.0%	50.0%	28.6%	100.0%	50.0%	44.4%	50.0%	100.0%	50.0%
\$15,001–\$30,000	Loan Originated	158	152	112	96	92	149	113	117	989
	Application Denied	37	30	31	19	22	14	12	19	184
	Denial Rate	19.0%	16.5%	21.7%	16.5%	19.3%	8.6%	9.6%	14.0%	15.7%
\$30,001–\$45,000	Loan Originated	434	535	424	272	263	242	182	148	2,500
	Application Denied	69	76	65	38	28	24	10	23	333
	Denial Rate	13.7%	12.4%	13.3%	12.3%	9.6%	9.0%	5.2%	13.5%	11.8%
\$45,001–\$60,000	Loan Originated	392	369	342	183	187	140	108	91	1,812
	Application Denied	35	62	75	30	24	11	6	14	257
	Denial Rate	8.2%	14.4%	18.0%	14.1%	11.4%	7.3%	5.3%	13.3%	12.4%
\$60,001–\$75,000	Loan Originated	157	189	184	97	81	44	49	49	850
	Application Denied	28	19	22	10	9	7	1	3	99
	Denial Rate	15.1%	9.1%	10.7%	9.3%	10.0%	13.7%	2.0%	5.8%	10.4%
Above \$75,000	Loan Originated	127	160	154	91	79	53	39	42	745
	Application Denied	15	22	34	18	11	2	5	9	116
	Denial Rate	10.6%	12.1%	18.1%	16.5%	12.2%	3.6%	11.4%	17.6%	13.5%
Data Missing	Loan Originated	53	33	51	18	9	3	1	6	174
	Application Denied	7	4	7	3	1	2	2	2	28
	Denial Rate	11.7%	10.8%	12.1%	14.3%	10.0%	40.0%	66.7%	25.0%	13.9%
Total	Loan Originated	1,325	1,442	1,272	757	712	636	496	453	7,093
	Application Denied	192	217	236	121	96	64	40	74	1,040
	Denial Rate	12.7%	13.1%	15.6%	13.8%	11.9%	9.1%	7.5%	14.0%	12.8%

Table 18.C.14
Loan Applications by Income and Race/Ethnicity of Applicant: Originated and Denied

18. City of Parma
 2004–2011 HMDA Data

Race		<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	> \$75K	Data Missing	Total
American Indian	Loan Originated	0	4	5	6	2	3	1	21
	Application Denied	0	0	4	0	0	0	0	4
	Denial Rate	%	.0%	44.4%	.0%	.0%	.0%	.0%	16.0%
Asian	Loan Originated	0	15	39	25	12	12	1	104
	Application Denied	1	3	3	3	5	4	0	19
	Denial Rate	100.0%	16.7%	7.1%	10.7%	29.4%	25.0%	.0%	15.4%
Black	Loan Originated	0	5	23	21	13	8	1	71
	Application Denied	1	10	14	15	4	6	0	50
	Denial Rate	100.0%	66.7%	37.8%	41.7%	23.5%	42.9%	.0%	41.3%
White	Loan Originated	20	909	2,311	1,654	761	671	161	6,487
	Application Denied	18	145	278	209	80	92	22	844
	Denial Rate	47.4%	13.8%	10.7%	11.2%	9.5%	12.1%	12.0%	11.5%
Not Available	Loan Originated	3	56	119	103	62	51	10	404
	Application Denied	3	26	34	30	10	14	6	123
	Denial Rate	50.0%	31.7%	22.2%	22.6%	13.9%	21.5%	37.5%	23.3%
Not Applicable	Loan Originated	0	0	3	3	0	0	0	6
	Application Denied	0	0	0	0	0	0	0	0
	Denial Rate	%	%	.0%	.0%	%	%	%	.0%
Total	Loan Originated	23	989	2,500	1,812	850	745	174	7,093
	Application Denied	23	184	333	257	99	116	28	1,040
	Denial Rate	50.0%	15.7%	11.8%	12.4%	10.4%	13.5%	13.9%	12.8%
Non-Hispanic Ethnicity	Loan Originated	19	901	2,267	1,642	762	664	152	6,407
	Application Denied	18	147	268	218	85	98	19	853
	Denial Rate	48.6%	14.0%	10.6%	11.7%	10.0%	12.9%	11.1%	11.7%
Hispanic (Ethnicity)	Loan Originated	1	26	76	40	11	25	2	181
	Application Denied	1	8	16	4	2	2	1	34
	Denial Rate	50.0%	23.5%	17.4%	9.1%	15.4%	7.4%	33.3%	15.8%

PREDATORY LENDING

Table 18.C.15
Originated Owner-Occupied Loans by HAL Status

18. City of Parma
 2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Other	1,188	1,069	954	658	632	597	494	453	6,045
HAL	137	373	318	99	80	39	2	0	1,048
Total	1,325	1,442	1,272	757	712	636	496	453	7,093
Percent HAL	10.3%	25.9%	25.0%	13.1%	11.2%	6.1%	.4%	.0%	14.8%

Table 18.C.16
Loans by Loan Purpose by HAL Status
 18. City of Parma
 2004–2011 HMDA Data

Loan Purpose		2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	Other	1,188	1,069	954	658	632	597	494	453	6,045
	HAL	137	373	318	99	80	39	2	0	1,048
	Percent HAL	10.3%	25.9%	25.0%	13.1%	11.2%	6.1%	.4%	.0%	14.8%
Home Improvement	Other	186	233	232	243	173	86	85	75	1,313
	HAL	28	34	24	34	10	20	5	3	158
	Percent HAL	13.1%	12.7%	9.4%	12.3%	5.5%	18.9%	5.6%	3.8%	10.7%
Refinancing	Other	1,468	1,130	803	627	493	771	838	696	6,826
	HAL	191	364	329	167	72	44	1	3	1,171
	Percent HAL	11.5%	24.4%	29.1%	21.0%	12.7%	5.4%	.1%	.4%	14.6%
Total	Other	2,842	2,432	1,989	1,528	1,298	1,454	1,417	1,224	14,184
	HAL	356	771	671	300	80	39	2	0	2,377
	Percent HAL	11.1%	24.1%	25.2%	16.4%	11.1%	6.6%	.6%	.5%	14.4%

Table 18.C.17
HALs Originated by Race of Borrower
 18. City of Parma
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	1	0	3	1	0	0	0	0	5
Asian	3	4	2	3	0	0	0	0	12
Black	4	13	5	2	1	0	0	0	25
White	111	289	274	87	75	38	2	0	876
Not Available	16	67	34	6	4	1	0	0	128
Not Applicable	2	0	0	0	0	0	0	0	2
Total	137	373	318	99	80	39	2	0	1,048
Hispanic (Ethnicity)	2	12	10	3	3	1	0	0	31

Table 18.C.18
Rate of HALs Originated by Race/Ethnicity of Borrower
 18. City of Parma
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	25.0%	.0%	50.0%	25.0%	.0%	.0%	.0%	.0%	23.8%
Asian	13.6%	21.1%	11.1%	20.0%	.0%	.0%	.0%	.0%	11.5%
Black	40.0%	56.5%	55.6%	28.6%	16.7%	.0%	.0%	.0%	35.2%
White	9.1%	22.2%	23.6%	12.6%	11.4%	6.4%	.4%	.0%	13.5%
Not Available	23.2%	69.1%	43.0%	14.0%	11.1%	3.2%	.0%	.0%	31.7%
Not Applicable	40.0%	%	.0%	%	%	%	%	%	33%
Average	10.3%	25.9%	25.0%	13.1%	11.2%	6.1%	0.4%	0.0%	14.8%
Non-Hispanic Ethnicity	9.6%	22.0%	23.5%	12.8%	11.2%	6.3%	.4%	%	%
Hispanic (Ethnicity)	8.3%	33.3%	32.3%	18.8%	16.7%	4.3%	.0%	.0%	17.1%

Table 18.C.19
Loans by HAL Status by Race/Ethnicity of Borrower
 18. City of Parma
 2004–2011 HMDA Data

Race	Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Other	3	1	3	3	2	2	1	1	16
	HAL	1	0	3	1	0	0	0	0	5
	Percent HAL	25.0%	.0%	50.0%	25.0%	.0%	.0%	.0%	.0%	23.8%
Asian	Other	19	15	16	12	10	6	6	8	92
	HAL	3	4	2	3	0	0	0	0	12
	Percent HAL	13.6%	21.1%	11.1%	20.0%	.0%	.0%	.0%	.0%	11.5%
Black	Other	6	10	4	5	5	6	5	5	46
	HAL	4	13	5	2	1	0	0	0	25
	Percent HAL	40.0%	56.5%	55.6%	28.6%	16.7%	.0%	.0%	.0%	35.2%
White	Other	1,104	1,013	885	601	583	553	453	419	5,611
	HAL	111	289	274	87	75	38	2	0	876
	Percent HAL	9.1%	22.2%	23.6%	12.6%	11.4%	6.4%	0.4%	0.0%	13.5%
Not Available	Other	53	30	45	37	32	30	29	20	276
	HAL	16	67	34	6	4	1	0	0	128
	Percent HAL	23.2%	69.1%	43.0%	14.0%	11.1%	3.2%	.0%	.0%	31.7%
Not Applicable	Other	3	0	1	0	0	0	0	0	4
	HAL	2	0	0	0	0	0	0	0	2
	Percent HAL	40.0%	%	.0%	%	%	%	%	%	33.0%
Total	Other	1,188	1,069	954	658	632	597	494	453	6,045
	HAL	137	373	318	99	80	39	2	0	1,048
	Percent HAL	10.3%	25.9%	25.0%	13.1%	11.2%	6.1%	.4%	.0%	14.8%
Non-Hispanic Ethnicity	Other	1,040	1,009	884	607	586	549	449	413	5,537
	HAL	111	285	272	89	74	37	2		
	Percent HAL	9.6%	22.0%	23.5%	12.8%	11.2%	6.3%	.4%	%	%
Hispanic (Ethnicity)	Other	22	24	21	13	15	22	16	17	150
	HAL	2	12	10	3	3	1	0	0	31
	Percent HAL	8.3%	33.3%	32.3%	18.8%	16.7%	4.3%	.0%	.0%	17.1%

Table 18.C.20
Rates of HALs by Income of Borrower
 18. City of Parma
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Average
\$15,000 or Below	.0%	.0%	20.0%	%	.0%	.0%	.0%	%	4.3%
\$15,001–\$30,000	7.6%	26.3%	17.0%	19.8%	9.8%	4.7%	.9%	.0%	10.8%
\$30,001–\$45,000	9.9%	26.2%	23.1%	12.1%	11.4%	7.4%	.0%	.0%	14.5%
\$45,001–\$60,000	14.5%	32.0%	28.9%	9.8%	10.2%	6.4%	.9%	.0%	17.7%
\$60,001–\$75,000	8.9%	19.6%	26.1%	15.5%	9.9%	6.8%	.0%	.0%	14.7%
Above \$75,000	7.9%	19.4%	24.0%	8.8%	17.7%	3.8%	0.0%	.0%	13.7%
Data Missing	1.9%	21.2%	31.4%	33.3%	.0%	.0%	.0%	.0%	17.2%
Average	10.3%	25.9%	25.0%	13.1%	11.2%	6.1%	.4%	.0%	14.8%

Table 18.C.21
Loans by HAL Status by Income of Borrower
 18. City of Parma
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Other	4	4	4	0	1	5	4	0	22
	HAL	0	0	1	0	0	0	0	0	1
	Percent HAL	.0%	.0%	20.0%	%	.0%	.0%	.0%	%	4.3%
\$15,001–\$30,000	Other	146	112	93	77	83	142	112	117	882
	HAL	12	40	19	19	9	7	1	0	107
	Percent HAL	7.6%	26.3%	17.0%	19.8%	9.8%	4.7%	.9%	.0%	10.8%
\$30,001–\$45,000	Other	391	395	326	239	233	224	182	148	2,138
	HAL	43	140	98	33	30	18	0	0	362
	Percent HAL	9.9%	26.2%	23.1%	12.1%	11.4%	7.4%	.0%	.0%	14.5%
\$45,001 – \$60,000	Other	335	251	243	165	168	131	107	91	1,491
	HAL	57	118	99	18	19	9	1	0	321
	Percent HAL	14.5%	32.0%	28.9%	9.8%	10.2%	6.4%	.9%	.0%	17.7%
\$60,001–\$75,000	Other	143	152	136	82	73	41	49	49	725
	HAL	14	37	48	15	8	3	0	0	125
	Percent HAL	8.9%	19.6%	26.1%	15.5%	9.9%	6.8%	.0%	.0%	14.7%
Above \$75,000	Other	117	129	117	83	65	51	39	42	643
	HAL	10	31	37	8	14	2	0	0	102
	Percent HAL	7.9%	19.4%	24.0%	8.8%	17.7%	3.8%	.0%	.0%	13.7%
Data Missing	Other	52	26	35	12	9	3	1	6	144
	HAL	1	7	16	6	0	0	0	0	30
	Percent HAL	1.9%	21.2%	31.4%	33.3%	.0%	.0%	.0%	.0%	17.2%
Total	Other	1,188	1,069	954	658	632	597	494	453	6,045
	HAL	137	373	318	99	80	39	2	0	1,048
	Percent HAL	10.3%	25.9%	25.0%	13.1%	11.2%	6.1%	.4%	.0%	14.8%

D. CRA DATA

Additional data tables related to Community Reinvestment Act (CRA) data are presented in this section.

Table 18.D.1
Small Business Loans Originated: \$100,000 or Less by Tract MFI
 18. City of Parma
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000			735	175		910
2001			740	137		877
2002			957	185		1,142
2003			1,145	93		1,238
2004			1,081	91		1,172
2005			1,259	115		1,374
2006			1,790	158		1,948
2007			2,021	177		2,198
2008			1,396	143		1,539
2009			566	54		620
2010			528	49		577
2011			637	60		697
Total	0	0	12,855	1,437	0	14,292
Loan Amount (\$1,000s)						
2000			7,270	1,535		8,805
2001			8,078	1,310		9,388
2002			10,919	1,679		12,598
2003			11,336	628		11,964
2004			11,429	572		12,001
2005			13,212	1,045		14,257
2006			17,464	1,347		18,811
2007			18,928	1,617		20,545
2008			13,669	1,081		14,750
2009			7,217	681		7,898
2010			7,023	678		7,701
2011			8,415	874		9,289
Total	0	0	134,960	13,047	0	148,007

Table 18.D.2
Small Business Loans Originated: \$100,001 to \$250,000 by Tract MFI
 18. City of Parma
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000			16	5		21
2001			23	2		25
2002			16	0		16
2003			13	2		15
2004			37	2		39
2005			29	1		30
2006			27	3		30
2007			20	2		22
2008			19	3		22
2009			16	1		17
2010			20	2		22
2011			19	1		20
Total	0	0	255	24	0	279
Loan Amount (\$1,000s)						
2000			2,670	828		3,498
2001			4,425	356		4,781
2002			2,756	0		2,756
2003			2,328	276		2,604
2004			6,623	320		6,943
2005			5,073	102		5,175
2006			4,590	313		4,903
2007			3,367	263		3,630
2008			3,227	544		3,771
2009			2,560	150		2,710
2010			3,629	375		4,004
2011			3,319	105		3,424
Total	0	0	44,567	3,632	0	48,199

Table 18.D.3
Small Business Loans Originated: More than \$250,000 by Tract MFI
 18. City of Parma
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000			14	3		17
2001			22	0		22
2002			17	2		19
2003			22	1		23
2004			20	1		21
2005			21	2		23
2006			28	1		29
2007			9	0		9
2008			19	1		20
2009			17	1		18
2010			21	2		23
2011			19	1		20
Total	0	0	229	15	0	244
Loan Amount (\$1,000s)						
2000			6,893	1,830		8,723
2001			13,745	0		13,745
2002			10,626	1,118		11,744
2003			12,017	340		12,357
2004			10,116	419		10,535
2005			9,036	967		10,003
2006			16,106	500		16,606
2007			4,783	0		4,783
2008			8,553	488		9,041
2009			8,039	441		8,480
2010			11,944	685		12,629
2011			10,344	325		10,669
Total	0	0	122,202	7,113	0	129,315

Table 18.D.4
Small Business Loans to Businesses with Gross Annual Revenues of Less Than \$1 Million by Tract MFI
 18. City of Parma
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000			252	69		321
2001			347	63		410
2002			253	52		305
2003			355	34		389
2004			355	30		385
2005			590	66		656
2006			733	68		801
2007			789	71		860
2008			482	57		539
2009			203	22		225
2010			217	20		237
2011			321	30		351
Total	0	0	4,897	582	0	5,479
Loan Amount (\$1,000s)						
2000			7,545	2,381		9,926
2001			9,391	1,354		10,745
2002			8,865	1,992		10,857
2003			11,072	952		12,024
2004			13,666	860		14,526
2005			15,092	1,802		16,894
2006			18,911	1,364		20,275
2007			10,898	1,163		12,061
2008			10,301	1,627		11,928
2009			5,329	848		6,177
2010			8,782	930		9,712
2011			6,581	472		7,053
Total	0	0	126,433	15,745	0	142,178

E. COMPLAINT DATA

This section contains data regarding fair housing complaints, as provided by the U.S. Department of Housing and Urban Development (HUD), the Ohio Civil Rights Commission (OCRC), and the Fair Housing Resource Center (FHRC).

HUD COMPLAINTS

Table 18.E.1
Fair Housing Complaints by Basis
 18. City of Parma
 2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability	1				2	3	1			7
Family Status	1	5						1	2	9
National Origin		1				2	1	1		5
Race	3	4	2	1		1				11
Total Bases	5	10	2	1	2	6	2	2	2	32
Total Complaints	5	9	2	1	2	6	2	1	2	30

Table 18.E.2
Fair Housing Complaints by Issue
 18. City of Parma
 2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Discriminatory refusal to rent	2	2			1	1		1		7
Discriminatory terms, conditions, privileges, or services and facilities		2		1	1					4
Discriminatory advertising, statements, and notices		1						1	1	3
Discriminatory acts under Section 818 (coercion, etc.)		2	1							3
Failure to make reasonable accommodation	1					1				2
Discrimination in terms, conditions or privileges relating to rental	3	4	1			3	2	1		14
Discriminatory refusal to negotiate for rental						1				1
Discriminatory refusal to rent and negotiate for rental		1								1
Discriminatory advertisement - rental									1	1
Failure to permit reasonable modification					1					1
Total Issues	6	12	2	1	3	6	2	3	2	37
Total Complaints	5	9	2	1	2	6	2	1	2	30

Table 18.E.3
Fair Housing Complaints by Closure Status
 18. City of Parma
 2004–2012 HUD Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Administrative Closure		3			1					4
Cause (FHAP)		1							1	2
Conciliated / Settled	2	3	2		1	3	2	1		14
No Cause	3	2		1		3				9
Open									1	1
Total Complaints	5	9	2	1	2	6	2	1	2	30

HUD Complaints Found With Cause

Table 18.E.4
Fair Housing Complaints Found With Cause by Basis
 18. City of Parma
 2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability	1				1		1			3
Family Status		3						1	1	5
National Origin						2	1	1		4
Race	1	2	2			1				6
Total Bases	2	5	2		1	3	2	2	1	18
Total Complaints	2	4	2		1	3	2	1	1	16

Table 18.E.5
Fair Housing Complaints Found With Cause by Issue
 18. City of Parma
 2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Discrimination in terms, conditions or privileges relating to rental	2	2	1			1	2	1		9
Discriminatory refusal to rent		2			1	1		1		5
Discriminatory advertising, statements, and notices		1						1	1	3
Discriminatory acts under Section 818 (coercion, etc.)		1	1							2
Discriminatory refusal to negotiate for rental						1				1
Failure to permit reasonable modification					1					1
Failure to make reasonable accommodation	1									1
Total Issues	3	6	2	0	2	3	2	3	1	22
Total Complaints	2	4	2		1	3	2	1	1	16

OHIO CIVIL RIGHTS COMMISSION COMPLAINTS

Table 18.E.6
Fair Housing Complaints by Basis
 18. City of Parma
 2004–2012 OCRRC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability					2	1	1			4
Family Status	1	4		1	1	1				8
Gender				1						1
National Origin		1					1			2
Race	3	4			1			1		9
Retaliation		1								1
Total Bases	4	10	0	2	3	3	2	1	0	25
Total Complaints	4	7		1	3	3	2	1		21

Table 18.E.7
Fair Housing Complaints by Issue
 18. City of Parma
 2004–2012 OCRRC Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Advertising		1								1
Exclusion	2	2		1	3	1				9
Harassment		1								1
Intimidation		2								2
Other	1	2				2	2			7
Reasonable Accommodation					1					1
Terms and Conditions	1	3						1		5
Total Issues	4	11	0	1	4	3	2	1	0	26
Total Complaints	4	7		1	3	3	2	1		21

Table 18.E.8
Fair Housing Complaints by Closure Status
 18. City of Parma
 2004–2012 OCRRC Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
CP Failed to Cooperate		1								1
CP Withdrawal – No Benefit		3								3
Failure to Locate Charging Party					1					1
No Cause Finding Issued	3	1		1		2		1		8
Settlement With Benefits		1					1			2
Successful Conciliation					1					1
Withdrawal With Benefits	1	1			1	1	1			5
Total Complaints	4	7	0	1	3	3	2	1	0	21

FAIR HOUSING RESOURCE CENTER COMPLAINTS

Table 18.E.11
Fair Housing Complaints by Basis
 18. City of Parma
 2004– 2012 FHRC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability				1						1
Total Bases	0	0	0	1	0	0	0	0	0	1
Total Complaints				1						1

Table 18.E.12
Fair Housing Complaints by Issue Type
 18. City of Parma
 2004– 2012 FHRC Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Rental				1						1
Total	0	0	0	1	0	0	0	0	0	1

Table 18.E.13
Fair Housing Complaints by Closure Status
 18. City of Parma
 2004– 2012 FHRC Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Settled through counseling				1						1
Total	0	0	0	1	0	0	0	0	0	1

THE HOUSING RESEARCH AND ADVOCACY CENTER

Table 18.E.14
Fair Housing Complaints by Basis

18 City of Parma
2004–2012 HRAC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability				1		1	2	1	2	7
Race							2	1		3
Criminal History							1			1
Ethnicity									1	1
National Origin									1	1
Total Bases	0	0	0	1	0	1	5	2	4	13
Total Complaints				1		1	6	2	3	13

Table 18.E.15
Fair Housing Complaints by Issue

18 City of Parma
2004–2012 HRAC Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Rental						1	6	2	3	12
Sale				1						1
Total	0	0	0	1	0	1	6	2	3	13
Total Complaints				1		1	6	2	3	13

Table 18.E.16
Fair Housing Complaints by Action Taken

18 City of Parma
2004–2012 HRAC Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Referred to OCRC				1			2	1	2	6
Fair Housing Info Given							2	1		3
Referred to City							2			2
Reasonable Accommodation						1				1
HRAC Conducted Test							1			1
Total	0	0	0	1	0	1	7	2	2	13
Total Complaints				1		1	6	2	3	13

F. FAIR HOUSING SURVEY FOR HOUSING STAKEHOLDERS DATA

No responses were received from Parma in the 2012–2013 Fair Housing Survey for Housing Stakeholders.

G. LAND USE PLANNING SURVEY DATA

This section contains data regarding the potential effects of local land use and housing policies on fair housing choice, as gathered from the Land Use Planning Interview.

ENTITLEMENT COMMUNITY LAND USE PLANNING INTERVIEWS

In the Region's 18 entitlement cities and four entitlement counties, public sector policies were evaluated through individual telephone interviews that followed the structure of the 2012–2013 Fair Housing Survey for Government Officials, an online survey for nonentitlement community planning staff. This allowed for more thorough answers to the same key questions about public sector policies.

The appropriate planning and community development staff person or persons at these communities was solicited from members of the Progress Review Team, representing each entitlement community.

Table 18.G.1
Housing Development
 18. City of Parma
 2012 Land Use Planning Interview Data

Question: Does your jurisdiction...	Response
Housing Development	
Have a definition for the term "dwelling unit"?	Yes
Encourage or allocate funding for affordable housing development?	No
Have any potential barriers to the development of low- to moderate- income housing?	No
Occupancy Standards	
Have a definition for the term "family"?	Yes
Have any residential occupancy standards or limits?	No
Allow the mixed-use housing development?	Yes
Have any potential barriers to the development of mixed-use housing?	Yes
Special Needs Housing	
Have a definition for the term "disability"?	No
Have any particular standards/policies regarding accessible housing?	No
Have any special process for persons with disabilities to request variances for accessible housing?	Yes
Have any special standards for the development of senior housing?	No
Distinguish senior citizen housing from other residential uses in any way?	No
Address group housing, or have any special policies for any other special needs housing?	Yes
Fair Housing Policies	
Have a fair housing ordinance, policy, or regulation?	Yes
Participate in any activities or practices for "affirmatively furthering fair housing"?	Yes

H. IMPEDIMENTS

The 2013 Northeast Ohio Regional Analysis of Impediments to Fair Housing Choice uncovered several potential issues regarding fair housing in the City of Parma. Identification of these items as probable impediments to fair housing choice was based on HUD's definition of impediments as actions, omissions, or decisions that restrict housing

choice due to protected class status or actions, omissions, or decisions that have this effect. The identified impediments are supported by evidence uncovered during the Regional AI process, with impediments of higher need being those identified in multiple sources.

These probable impediments in the entirety of the Northeast Ohio Region are presented in **Volumes I and II** of the Regional AI. They are accompanied by suggested actions that jurisdictions in the Region may implement in order to alleviate or eliminate these impediments, and are accompanied by measurable objectives. The goal of these actions and measureable objectives is to assist these agencies in offering greater housing choice for all citizens of the Northeast Ohio Region.

The following list presents the private and public sector impediments found in the City of Parma.

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 in Parma

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, including Parma.

Suggestion: Construct a regional 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 in Parma. 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, including Parma. 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, including in Parma.

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 and was found in Parma as well.

Suggestion: Construct a regional 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.

IMPEDIMENTS MATRIX

The matrix on the following page includes the impediment, data source, or sources that indicated its existence, protected classes most affected, and ranking of need for action. Level of need for action was determined based on the number of data sources that identified each impediment.

Table 18.H.1
Impediments Matrix
 18. City of Parma
 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 ⁷⁴			
Private Sector													
1	Denial of available housing units in the rental markets		X				X	X				Black and Hispanic persons	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				Disabled persons	L
Public Sector													
1	Lack of sufficient fair housing policies or practices by several units of local government							X				All	L
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		All	M
5	Decisions regarding definitions of "family," "dwelling unit," and related terms									X		Disabled persons, families	L
6	Lack of inclusionary policies							X		X		All	M

⁷⁴ 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.

19. REMAINDER OF CUYAHOGA COUNTY

A. CENSUS BUREAU DATA

This section contains additional data from the U.S. Census Bureau.

Table 19.A.1

Population by Age

19. Remainder of Cuyahoga County
2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Under 5	35,693	5.5%	32,371	5.1%	-9.3%
5 to 19	127,546	19.8%	123,345	19.4%	-3.3%
20 to 24	29,365	4.6%	31,639	5.0%	7.7%
25 to 34	74,130	11.5%	67,965	10.7%	-8.3%
35 to 54	199,672	31.0%	179,543	28.2%	-10.1%
55 to 64	63,057	9.8%	88,304	13.9%	40.0%
65 or Older	113,919	17.7%	113,524	17.8%	-.3%
Total	643,382	100.0%	636,691	100.0%	-1.0%

Table 19.A.2

Elderly Population by Age

19. Remainder of Cuyahoga County
2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
65 to 66	10,578	9.3%	11,957	10.5%	13.0%
67 to 69	16,218	14.2%	17,359	15.3%	7.0%
70 to 74	28,426	25.0%	23,748	20.9%	-16.5%
75 to 79	26,029	22.8%	20,902	18.4%	-19.7%
80 to 84	18,082	15.9%	19,331	17.0%	6.9%
85 or Older	14,586	12.8%	20,227	17.8%	38.7%
Total	113,919	100.0%	113,524	100.0%	-.3%

Table 19.A.3

Population by Race and Ethnicity

19. Remainder of Cuyahoga County
2000 & 2010 Census SF1 Data

Race	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
White	543,228	84.4%	499,437	78.4%	-8.1%
Black	74,267	11.5%	101,323	15.9%	36.4%
American Indian	612	.1%	722	.1%	18.0%
Asian	14,818	2.3%	20,758	3.3%	40.1%
Native Hawaiian/ Pacific Islander	106	.0%	133	.0%	25.5%
Other	2,489	.4%	3,867	.6%	55.4%
Two or More Races	7,862	1.2%	10,451	1.6%	32.9%
Total	643,382	100.0%	636,691	100.0%	-1.0%
Non-Hispanic	635,226	98.7	621,868	97.7%	-2.1%
Hispanic	8,156	1.3%	14,823	2.3%	81.7%

Table 19.A.4**Disability by Age**19. Remainder of Cuyahoga County
2010 Three-Year ACS Data

Age	Male		Female		Total	
	Disabled Population	Disability Rate	Disabled Population	Disability Rate	Disabled Population	Disability Rate
Under 5	136	.8%	78	.5%	214	.6%
5 to 17	3,130	5.4%	1,877	3.5%	5,007	4.5%
18 to 34	4,264	7.4%	3,076	5.0%	7,340	6.2%
35 to 64	11,677	9.1%	13,668	9.6%	25,345	9.4%
65 to 74	4,690	20.3%	6,532	21.8%	11,222	21.1%
75 or Older	9,590	44.6%	17,012	48.7%	26,602	47.1%
Total	33,487	10.9%	42,243	12.5%	75,730	11.7%

Table 19.A.5**Employment Status by Disability and Type: Age 18 to 64**19. Remainder of Cuyahoga County
2010 Three-Year ACS Data

Disability Status	Population
Employed:	293,399
With a disability:	13,666
With a hearing difficulty	3,610
With a vision difficulty	1,969
With a cognitive difficulty	4,801
With an ambulatory difficulty	4,943
With a self-care difficulty	1,603
With an independent living difficulty	3,387
No disability	279,733
Unemployed:	25,153
With a disability:	2,736
With a hearing difficulty	503
With a vision difficulty	419
With a cognitive difficulty	1,241
With an ambulatory difficulty	1,048
With a self-care difficulty	332
With an independent living difficulty	692
No disability	22,417
Not in labor force:	71,163
With a disability:	16,283
With a hearing difficulty	2,052
With a vision difficulty	2,215
With a cognitive difficulty	8,172
With an ambulatory difficulty	9,230
With a self-care difficulty	4,390
With an independent living difficulty	8,155
No disability	54,880
Total	389,715

Table 19.A.6**Households by Income**19. Remainder of Cuyahoga County
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	25,771	9.8%	23,725	9.1%
\$15,000 to \$19,999	13,055	5.0%	12,138	4.7%
\$20,000 to \$24,999	14,549	5.5%	12,751	4.9%
\$25,000 to \$34,999	30,647	11.7%	26,055	10.0%
\$35,000 to \$49,999	42,872	16.3%	37,226	14.3%
\$50,000 to \$74,999	55,953	21.3%	48,034	18.5%
\$75,000 to \$99,999	34,356	13.1%	34,625	13.3%
\$100,000 or More	45,313	17.3%	64,963	25.0%
Total	262,516	100.0%	259,517	100.0%

Table 19.A.7**Poverty by Age**19. Remainder of Cuyahoga County
2000 Census SF3 & 2010 Five-Year ACS Data

Age	2000 Census		2010 Five-Year ACS	
	Persons in Poverty	% of Total	Persons in Poverty	% of Total
Under 6	2,283	7.9%	4,625	10.2%
6 to 17	5,438	18.8%	9,586	21.1%
18 to 64	15,617	54.0%	24,566	54.1%
65 or Older	5,592	19.3%	6,644	14.6%
Total	28,930	100.0%	45,421	100.0%
Poverty Rate	4.6%	.	7.3%	.

Table 19.A.8**Households by Year Home Built**19. Remainder of Cuyahoga County
2000 Census SF3 & 2010 Five-Year ACS Data

Year Built	2000 Census		2010 Five-Year ACS	
	Households	% of Total	Households	% of Total
1939 or Earlier	28,406	10.8%	27,386	10.6%
1940 to 1949	27,207	10.4%	21,345	8.2%
1950 to 1959	63,603	24.2%	64,984	25.0%
1960 to 1969	53,339	20.3%	46,636	18.0%
1970 to 1979	39,583	15.1%	37,904	14.6%
1980 to 1989	24,454	9.3%	23,635	9.1%
1990 to 1999	25,903	9.9%	23,338	9.0%
2000 to 2004	.	.	9,630	3.7%
2005 or Later	.	.	4,659	1.8%
Total	262,495	100.0%	259,517	100.0%

Table 19.A.9**Housing Units by Type**19. Remainder of Cuyahoga County
2000 Census SF3 & 2010 Five-Year ACS Data

Unit Type	2000 Census		2010 Five-Year ACS	
	Units	% of Total	Units	% of Total
Single-Family	203,169	73.9%	210,000	74.7%
Duplex	6,304	2.3%	6,085	2.2%
Tri- or Four-Plex	4,016	1.5%	4,494	1.6%
Apartment	59,254	21.6%	58,521	20.8%
Mobile Home	2,046	.7%	1,960	.7%
Boat, RV, Van, Etc.	0	.0%	58	.0%
Total	274,789	100.0%	281,118	100.0%

Table 19.A.10**Housing Units by Tenure**19. Remainder of Cuyahoga County
2000 & 2010 Census SF1 Data

Tenure	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
Occupied Housing Units	262,524	95.5%	266,875	92.6%	1.7%
Owner-Occupied	197,719	75.3%	195,149	73.1%	-1.3%
Renter-Occupied	64,805	24.7%	71,726	26.9%	10.7%
Vacant Housing Units	12,281	4.5%	21,221	7.4%	72.8%
Total Housing Units	274,805	100.0%	288,096	100.0%	4.8%

Table 19.A.11**Disposition of Vacant Housing Units**19. Remainder of Cuyahoga County
2000 & 2010 Census SF1 Data

Disposition	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
For Rent	5,446	44.3%	8,672	40.9%	59.2%
For Sale	2,337	19.0%	4,546	21.4%	94.5%
Rented or Sold, Not Occupied	1,277	10.4%	1,336	6.3%	4.6%
For Seasonal, Recreational, or Occasional Use	1,259	10.3%	1,673	7.9%	32.9%
For Migrant Workers	6	0.0%	4	.0%	-33.3%
Other Vacant	1,956	15.9%	4,990	23.5%	155.1%
Total	12,281	100.0%	21,221	100.0%	72.8%

Table 19.A.12**Households by Household Size**19. Remainder of Cuyahoga County
2000 & 2010 Census SF1 Data

Size	2000 Census		2010 Census		% Change 00-10
	Households	% of Total	Households	% of Total	
One Person	77,551	29.5%	84,505	31.7%	9.0%
Two Persons	89,228	34.0%	90,027	33.7%	.9%
Three Persons	39,824	15.2%	39,887	14.9%	.2%
Four Persons	34,442	13.1%	32,047	12.0%	-7.0%
Five Persons	15,075	5.7%	13,813	5.2%	-8.4%
Six Persons	4,584	1.7%	4,533	1.7%	-1.1%
Seven Persons or More	1,820	.7%	2,063	.8%	13.4%
Total	262,524	100.0%	266,875	100.0%	1.7%

Table 19.A.13**Household Type by Tenure**19. Remainder of Cuyahoga County
2000 & 2010 Census SF1 Data

Household Type	2000 Census		2010 Census		% Change 00–10
	Households	% of Total	Households	% of Total	
Family Households	174,651	66.5%	170,258	63.8%	-2.5%
Married-Couple Family	140,730	80.6%	128,727	75.6%	-8.5%
Owner-Occupied	125,612	89.3%	114,373	88.8%	-8.9%
Renter-Occupied	15,118	10.7%	14,354	11.2%	-5.1%
Other Family	33,921	19.4%	41,531	24.4%	22.4%
Male Householder, No Spouse	7,674	22.6%	9,586	23.1%	24.9%
Owner-Occupied	5,286	68.9%	6,287	65.6%	18.9%
Renter-Occupied	2,388	31.1%	3,299	34.4%	38.1%
Female Householder, No Spouse	26,247	77.4%	31,945	76.9%	21.7%
Owner-Occupied	17,296	65.9%	18,157	56.8%	5.0%
Renter-Occupied	8,951	34.1%	13,788	43.2%	54.0%
Non-Family Households	87,873	33.5%	96,617	36.2%	10.0%
Owner-Occupied	49,525	56.4%	56,332	58.3%	13.7%
Renter-Occupied	38,348	43.6%	40,285	41.7%	5.1%
Total	262,524	100.0%	266,875	100.0%	1.7%

Table 19.A.14**Group Quarters Population**19. Remainder of Cuyahoga County
2000 & 2010 Census SF1 Data

Group Quarters Type	2000 Census		2010 Census		% Change 00-10
	Population	% of Total	Population	% of Total	
Institutionalized					
Correctional Institutions	300	3.9%	322	4.5%	7.3%
Juvenile Facilities	.	.	527	7.4%	.
Nursing Homes	6,287	82.0%	6,061	85.4%	-3.6%
Other Institutions	1,078	14.1%	184	2.6%	-82.9%
Total	7,665	100.0%	7,094	100.0%	-7.4%
Noninstitutionalized					
College Dormitories	3,661	63.7%	4,119	79.2%	12.5%
Military Quarters	0	.0%	0	.0%	%
Other Noninstitutional	2,086	36.3%	1,084	20.8%	-48.0%
Total	5,747	42.8%	5,203	42.3%	-9.5%
Total Group Quarters Population	13,412	100.0%	12,297	100.0%	-8.3%

Table 19.A.15**Overcrowding and Severe Overcrowding**19. Remainder of Cuyahoga County
2000 Census SF3 & 2010 Five-Year ACS Data

Data Source	No Overcrowding		Overcrowding		Severe Overcrowding		Total
	Households	% of Total	Households	% of Total	Households	% of Total	
Owner							
2000 Census	196,720	99.5%	874	.4%	176	.1%	197,770
2010 ACS	191,737	99.6%	684	.4%	34	.0%	192,455
Renter							
2000 Census	63,087	97.5%	1,027	1.6%	611	.9%	64,725
2010 ACS	65,961	98.4%	908	1.4%	193	.3%	67,062
Total							
2000 Census	259,807	99.0%	1,901	.7%	787	.3%	262,495
2010 ACS	257,698	99.3%	1,592	.6%	227	.1%	259,517

Table 19.A.16
Households with Incomplete Plumbing Facilities
 19. Remainder of Cuyahoga County
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Plumbing Facilities	261,841	258,468
Lacking Complete Plumbing Facilities	654	1,049
Total Households	262,495	259,517
Percent Lacking	.2%	.4%

Table 19.A.17
Households with Incomplete Kitchen Facilities
 19. Remainder of Cuyahoga County
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Kitchen Facilities	261,557	257,402
Lacking Complete Kitchen Facilities	938	2,115
Total Households	262,495	259,517
Percent Lacking	.4%	.8%

Table 19.A.18
Cost Burden and Severe Cost Burden by Tenure
 19. Remainder of Cuyahoga County
 2000 Census & 2010 Five-Year ACS Data

2000 Census & 2010 Five-Year ACS Data									
Data Source	Less Than 30%		31%-50%		Above 50%		Not Computed		Total
	Households	% of Total	Households	% of Total	Households	% of Total	Households	% of Total	
Owner With a Mortgage									
2000 Census	90,686	73.8%	21,669	17.6%	10,191	8.3%	376	.3%	122,922
2010 ACS	86,416	65.8%	28,432	21.7%	16,000	12.2%	472	.4%	131,320
Owner Without a Mortgage									
2000 Census	51,014	87.6%	4,379	7.5%	2,326	4.0%	530	.9%	58,249
2010 ACS	48,318	79.0%	7,415	12.1%	4,964	8.1%	438	.7%	61,135
Renter									
2000 Census	39,140	60.6%	11,814	18.3%	10,328	16.0%	3,253	5.0%	64,535
2010 ACS	34,393	51.3%	14,009	20.9%	14,835	22.1%	3,825	5.7%	67,062
Total									
2000 Census	180,840	73.6%	37,862	15.4%	22,845	9.3%	4,159	1.7%	245,706
2010 ACS	169,127	65.2%	49,856	19.2%	35,799	13.8%	4,735	1.8%	259,517

Table 19.A.19
Median Housing Costs
 19. Remainder of Cuyahoga County
 2000 Census SF3 & 2010 Five-Year ACS Data

Housing Cost	2000 Census	2010 ACS
Median Contract Rent	\$-2,402	\$-2,904
Median Home Value	\$-457,700	\$-548,500

B. BLS DATA

This section contains Bureau of Labor Statistics (BLS) data that address employment and income.

Table 19.B.1
Labor Force Statistics
 19. Remainder of Cuyahoga County
 1990–2011 BLS Data

Year	Labor Force	Employment	Unemployment	Unemployment Rate	Statewide Unemployment Rate
1990	322,231	312,548	9,683	3.0%	5.7%
1991	314,155	302,942	11,213	3.6%	6.6%
1992	315,946	302,594	13,352	4.2%	7.4%
1993	320,010	307,150	12,860	4.0%	6.7%
1994	324,050	312,278	11,772	3.6%	5.6%
1995	325,998	316,657	9,341	2.9%	4.9%
1996	327,311	318,850	8,461	2.6%	5.0%
1997	331,336	323,129	8,207	2.5%	4.6%
1998	333,857	326,226	7,631	2.3%	4.3%
1999	336,206	328,451	7,755	2.3%	4.3%
2000	343,469	335,267	8,202	2.4%	4.0%
2001	341,482	332,484	8,998	2.6%	4.4%
2002	337,139	325,875	11,264	3.3%	5.7%
2003	342,276	324,085	18,191	5.3%	6.2%
2004	338,463	320,276	18,187	5.4%	6.1%
2005	335,428	318,051	17,377	5.2%	5.9%
2006	333,398	316,722	16,676	5.0%	5.4%
2007	334,021	315,498	18,523	5.5%	5.6%
2008	332,051	311,528	20,523	6.2%	6.5%
2009	324,004	297,783	26,221	8.1%	10.1%
2010	341,934	314,650	27,284	8.0%	10.0%
2011	343,004	318,811	24,193	7.1%	8.6%

C. HMDA DATA

The Home Mortgage Disclosure Act (HMDA) requires both depository and non-depository lenders to collect and publicly disclose information about housing-related loans and loan applications.⁷⁵ The information presented in this section presents detailed HMDA data, including denial rates and predatory lending including high annual percentage rate (APR) loans.

Table 19.C.1

Purpose of Loan by Year
19. Remainder of Cuyahoga County
2004–2011 HMDA Data

Purpose	2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	21,325	23,953	23,580	16,099	11,266	11,071	9,651	8,601	125,546
Home Improvement	4,182	4,788	4,927	4,574	3,300	1,976	1,474	1,583	26,804
Refinancing	35,110	33,458	27,471	20,670	14,716	22,698	22,085	19,960	196,168
Total	60,617	62,199	55,978	41,343	29,282	35,745	33,210	30,144	348,518

Table 19.C.2

Occupancy Status for Home Purchase Loan Applications
19. Remainder of Cuyahoga County
2004–2011 HMDA Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	Total
Owner-Occupied	19,741	21,974	21,218	14,426	10,416	10,640	9,270	8,138	115,823
Not Owner-Occupied	1,435	1,920	2,314	1,629	838	420	352	454	9,362
Not Applicable	149	59	48	44	12	11	29	9	361
Total	21,325	23,953	23,580	16,099	11,266	11,071	9,651	8,601	125,546

Table 19.C.3

Owner-Occupied Home Purchase Loan Applications by Loan Type
19. Remainder of Cuyahoga County
2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Conventional	18,046	20,335	19,945	12,983	6,226	4,892	4,303	4,226	90,956
FHA - Insured	1,493	1,401	1,112	1,251	3,920	5,445	4,644	3,556	22,822
VA - Guaranteed	202	237	161	191	270	299	323	355	2,038
Rural Housing Service or Farm Service Agency	0	1	0	1	0	4	0	1	7
Total	19,741	21,974	21,218	14,426	10,416	10,640	9,270	8,138	115,823

⁷⁵ Data are considered “raw” because they contain entry errors and incomplete loan applications. Starting in 2004, the HMDA data made substantive changes in reporting. It modified the way it handled Hispanic data, loan interest rates, and the reporting of multifamily loan applications.

DENIAL RATES

Table 19.C.4
Loan Applications by Action Taken
 19. Remainder of Cuyahoga County
 2004–2011 HMDA Data

Action	2004	2005	2006	2007	2008	2009	2010	2011	Total
Loan Originated	11,808	12,600	11,255	7,862	5,811	5,541	4,907	4,241	64,025
Application Approved but not Accepted	1,271	1,397	1,337	816	415	226	280	225	5,967
Application Denied	1,654	2,228	2,534	1,572	972	646	632	642	10,880
Application Withdrawn by Applicant	1,253	1,349	1,256	650	589	488	471	463	6,519
File Closed for Incompleteness	350	357	333	256	143	113	134	84	1,770
Loan Purchased by the Institution	3,405	4,014	4,487	3,257	2,478	3,625	2,846	2,483	26,595
Preapproval Request Denied	0	29	16	13	8	1	0	0	67
Preapproval Approved but not Accepted	0	0	0	0	0	0	0	0	0
Total	19,741	21,974	21,218	14,426	10,416	10,640	9,270	8,138	115,823
Denial Rate	12.3%	15.0%	18.4%	16.7%	14.3%	10.4%	11.4%	13.1%	14.5%

Table 19.C.5
Denial Rates by Gender of Applicant
 19. Remainder of Cuyahoga County
 2004–2011 HMDA Data

Year	Male	Female	Not Available	Not Applicable	Average
2004	10.5%	13.4%	37.3%	10.0%	12.3%
2005	12.8%	17.4%	30.1%	.0%	15.0%
2006	16.1%	21.2%	28.8%	.0%	18.4%
2007	14.5%	20.0%	21.5%	25.0%	16.7%
2008	12.5%	16.7%	20.7%	33.3%	14.3%
2009	9.2%	11.2%	23.5%	%	10.4%
2010	9.6%	14.4%	13.4%	.0%	11.4%
2011	12.2%	14.4%	16.3%	.0%	13.1%
Average	12.6%	16.8%	25.4%	11.5%	14.5%

Table 19.C.6
Loan Applications by Selected Action Taken by Gender of Applicant
 19. Remainder of Cuyahoga County
 2004–2011 HMDA Data

Gender		2004	2005	2006	2007	2008	2009	2010	2011	Total
Male	Originated	7,702	7,878	7,027	5,016	3,584	3,456	3,063	2,624	40,350
	Denied	903	1,161	1,344	851	510	351	325	365	5,810
	Denial Rate	10.5%	12.8%	16.1%	14.5%	12.5%	9.2%	9.6%	12.2%	12.6%
Female	Originated	3,831	4,376	3,849	2,526	1,976	1,906	1,617	1,396	21,477
	Denied	592	920	1,038	633	396	240	272	234	4,325
	Denial Rate	13.4%	17.4%	21.2%	20.0%	16.7%	11.2%	14.4%	14.4%	16.8%
Not Available	Originated	266	342	376	317	249	179	226	220	2,175
	Denied	158	147	152	87	65	55	35	43	742
	Denial Rate	37.3%	30.1%	28.8%	21.5%	20.7%	23.5%	13.4%	16.3%	25.4%
Not Applicable	Originated	9	4	3	3	2	0	1	1	23
	Denied	1	0	0	1	1	0	0	0	3
	Denial Rate	10.0%	.0%	.0%	25.0%	33.3%	%	.0%	.0%	11.5%
Total	Originated	11,808	12,600	11,255	7,862	5,811	5,541	4,907	4,241	64,025
	Denied	1,654	2,228	2,534	1,572	972	646	632	642	10,880
	Denial Rate	12.3%	15.0%	18.4%	16.7%	14.3%	10.4%	11.4%	13.1%	14.5%

Table 19.C.7
Denial Rates by Race/Ethnicity of Applicant
 19. Remainder of Cuyahoga County
 2004–2011 HMDA Data

Race/Ethnicity	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	10.3%	33.3%	25.6%	22.6%	33.3%	12.5%	9.1%	16.7%	22.8%
Asian	7.9%	7.6%	8.7%	9.4%	10.7%	12.9%	11.5%	14.8%	9.8%
Black	23.1%	31.0%	38.2%	38.9%	29.7%	19.5%	24.0%	25.7%	31.0%
White	8.5%	10.1%	10.8%	10.8%	10.5%	8.3%	8.8%	10.5%	9.8%
Not Available	31.1%	25.8%	33.1%	25.1%	21.2%	17.8%	15.3%	18.6%	25.6%
Not Applicable	10.7%	.0%	.0%	33.3%	.0%	0%	0.0%	.0%	9.1%
Average	12.3%	15.0%	18.4%	16.7%	14.3%	10.4%	11.4%	13.1%	14.5%
Non-Hispanic	10.9%	13.9%	17.1%	16.0%	13.5%	9.7%	11.2%	12.7%	13.6%
Hispanic	11.0%	20.3%	19.2%	14.4%	21.1%	11.4%	9.1%	10.6%	15.4%

Table 19.C.8
Loan Applications by Selected Action Taken by Race/Ethnicity of Applicant
 19. Remainder of Cuyahoga County
 2004–2011 HMDA Data

Race		2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Originated	26	28	29	24	10	14	10	5	146
	Denied	3	14	10	7	5	2	1	1	43
	Denial Rate	10.3%	33.3%	25.6%	22.6%	33.3%	9.1%	9.1%	16.7%	22.8%
Asian	Originated	374	449	336	308	201	229	200	179	2,276
	Denied	32	37	32	32	24	34	26	31	248
	Denial Rate	7.9%	7.6%	8.7%	9.4%	10.7%	12.9%	11.5%	14.8%	9.8%
Black	Originated	1,567	1,828	1,817	988	736	589	560	408	8,493
	Denied	471	823	1,124	628	311	143	177	141	3,818
	Denial Rate	23.1%	31.0%	38.2%	38.9%	29.7%	19.5%	24.0%	25.7%	31.0%
White	Originated	9,150	9,452	8,356	5,999	4,449	4,372	3,777	3,284	48,839
	Denied	845	1,063	1,016	723	521	394	363	386	5,311
	Denial Rate	8.5%	10.1%	10.8%	10.8%	10.5%	8.3%	8.8%	10.5%	9.8%
Not Available	Originated	666	838	713	541	413	337	359	364	4,231
	Denied	300	291	352	181	111	73	65	83	1,456
	Denial Rate	31.1%	25.8%	33.1%	25.1%	21.2%	17.8%	15.3%	18.6%	25.6%
Not Applicable	Originated	25	5	4	2	2	0	1	1	40
	Denied	3	0	0	1	0	0	0	0	4
	Denial Rate	31.1%	25.8%	33.1%	25.1%	21.2%	17.8%	15.3%	18.6%	9.1%
Total	Originated	11,808	12,600	11,255	7,862	5,811	5,541	4,907	4,241	64,025
	Denied	1,654	2,228	2,534	1,572	972	646	632	642	10,880
	Denial Rate	12.3%	15.0%	18.4%	16.7%	14.3%	10.4%	11.4%	13.1%	14.5%
Non-Hispanic	Originated	9,791	11,413	10,322	7,165	5,309	5,112	4,459	3,815	57,386
	Denied	1,198	1,841	2,123	1,361	828	551	562	554	9,018
	Denial Rate	10.9%	13.9%	17.1%	16.0%	13.5%	9.7%	11.2%	12.7%	13.6%
Hispanic	Originated	187	177	215	149	86	101	100	93	1,108
	Denied	23	45	51	25	23	13	10	11	201
	Denial Rate	11.0%	20.3%	19.2%	14.4%	21.1%	11.4%	9.1%	10.6%	15.4%

Table 19.C.9
Loan Applications by Reason for Denial
 19. Remainder of Cuyahoga County
 2004–2011 HMDA Data

Denial Reason	2004	2005	2006	2007	2008	2009	2010	2011	Total
Debt-to-Income Ratio	216	290	265	267	181	138	154	151	1,662
Employment History	23	22	41	23	21	16	15	22	183
Credit History	330	397	384	333	221	149	146	132	2,092
Collateral	118	173	211	154	179	131	115	109	1,190
Insufficient Cash	47	27	51	33	21	20	24	20	243
Unverifiable Information	46	80	138	101	59	34	28	21	507
Credit Application Incomplete	198	202	184	211	64	37	55	72	1,023
Mortgage Insurance Denied	0	1	3	2	5	4	4	3	22
Other	315	594	468	213	106	57	49	48	1,850
Missing	361	442	789	235	115	60	42	64	2,108
Total	1,654	2,228	2,534	1,572	972	646	632	642	10,880

Table 19.C.10
Denial Rates by Income of Applicant
 19. Remainder of Cuyahoga County
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	42.1%	53.0%	52.1%	46.7%	56.0%	80.8%	65.2%	68.4%	54.6%
\$15,001–\$30,000	23.8%	30.5%	31.7%	29.7%	27.5%	19.7%	24.1%	22.0%	26.9%
\$30,001–\$45,000	15.1%	18.0%	21.1%	20.8%	18.8%	11.8%	14.8%	17.2%	17.6%
\$45,001–\$60,000	12.4%	14.7%	20.2%	16.6%	15.1%	9.9%	10.1%	12.9%	14.7%
\$60,001–\$75,000	10.4%	12.5%	18.1%	15.2%	12.0%	9.1%	12.1%	11.4%	13.1%
Above \$75,000	7.2%	10.3%	14.1%	12.6%	9.3%	7.3%	6.4%	9.6%	10.2%
Data Missing	18.0%	17.1%	13.2%	22.9%	21.3%	10.6%	28.2%	17.2%	17.3%
Total	12.3%	15.0%	18.4%	16.7%	14.3%	10.4%	11.4%	13.1%	14.5%

Table 19.C.11
Denial Rates of Loans by Race/Ethnicity and Income of Applicant
 19. Remainder of Cuyahoga County
 2004–2011 HMDA Data

Race	<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	Above \$75K	Data Missing	Average
American Indian	%	53.8%	9.7%	15.4%	18.5%	27.0%	40.0%	22.8%
Asian	63.6%	23.6%	13.4%	8.4%	10.7%	7.6%	11.5%	9.8%
Black	77.1%	40.8%	30.8%	27.6%	26.8%	30.3%	36.8%	31.0%
White	48.6%	18.2%	11.4%	10.2%	9.6%	7.2%	10.9%	9.8%
Not Available	56.3%	46.8%	32.1%	26.3%	22.7%	16.5%	43.4%	25.6%
Not Applicable	%	100.0%	.0%	20.0%	.0%	3.8%	33.3%	9.1%
Average	54.6%	26.9%	17.6%	14.7%	13.1%	10.2%	17.3%	14.5%
Non-Hispanic Ethnicity	52.1%	24.9%	16.5%	13.8%	12.4%	9.6%	14.2%	13.6%
Hispanic (Ethnicity)	60.0%	28.7%	15.8%	15.9%	16.6%	10.2%	8.3%	15.4%

Table 19.C.12
Loan Applications by Reason for Denial by Race/Ethnicity of Applicant
 19. Remainder of Cuyahoga County
 2004–2011 HMDA Data

Denial Reason	American Indian	Asian	Black	White	Not Available	Not Applicable	Total	Hispanic (Ethnicity)
Debt-to-Income Ratio	5	49	541	899	167	1	1,662	29
Employment History	0	10	49	109	15	0	183	6
Credit History	7	38	809	1,018	220	0	2,092	47
Collateral	8	28	313	707	134	0	1,190	30
Insufficient Cash	1	6	72	135	29	0	243	4
Unverifiable Information	4	15	176	257	53	2	507	14
Credit Application Incomplete	4	33	252	563	171	0	1,023	10
Mortgage Insurance Denied	1	3	4	12	2	0	22	1
Other	9	44	745	776	276	0	1,850	30
Missing	4	22	857	835	389	1	2,108	30
Total	43	248	3,818	5,311	1,456	4	10,880	201
% Missing	9.3%	8.9%	22.4%	15.7%	26.7%	25.0%	19.4%	14.9%

Table 19.C.13
Loan Applications by Income of Applicant: Originated and Denied
 19. Remainder of Cuyahoga County
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Loan Originated	33	31	34	16	11	5	8	6	144
	Application Denied	24	35	37	14	14	21	15	13	173
	Denial Rate	42.1%	53.0%	52.1%	46.7%	56.0%	80.8%	65.2%	68.4%	54.6%
\$15,001–\$30,000	Loan Originated	808	791	580	445	348	428	365	322	4,087
	Application Denied	253	347	269	188	132	105	116	91	1,501
	Denial Rate	23.8%	30.5%	31.7%	29.7%	27.5%	19.7%	24.1%	22.0%	26.9%
\$30,001–\$45,000	Loan Originated	2,260	2,459	2,065	1,366	1,158	1,150	863	738	12,059
	Application Denied	403	540	551	358	268	154	150	153	2,577
	Denial Rate	15.1%	18.0%	21.1%	20.8%	18.8%	11.8%	14.8%	17.2%	17.6%
\$45,001–\$60,000	Loan Originated	2,331	2,412	2,105	1,437	1,089	1,156	861	730	12,121
	Application Denied	331	417	532	286	193	127	97	108	2,091
	Denial Rate	12.4%	14.7%	20.2%	16.6%	15.1%	9.9%	10.1%	12.9%	14.7%
\$60,001–\$75,000	Loan Originated	1,624	1,810	1,545	1,012	793	713	620	528	8,645
	Application Denied	189	259	341	182	108	71	85	68	1,303
	Denial Rate	10.4%	12.5%	18.1%	15.2%	12.0%	9.1%	12.1%	11.4%	13.1%
Above \$75,000	Loan Originated	4,145	4,635	4,467	3,418	2,349	2,013	2,134	1,864	25,025
	Application Denied	321	535	734	494	240	159	147	198	2,828
	Denial Rate	7.2%	10.3%	14.1%	12.6%	9.3%	7.3%	6.4%	9.6%	10.2%
Data Missing	Loan Originated	607	462	459	168	63	76	56	53	1,944
	Application Denied	133	95	70	50	17	9	22	11	407
	Denial Rate	18.0%	17.1%	13.2%	22.9%	21.3%	10.6%	28.2%	17.2%	17.3%
Total	Loan Originated	11,808	12,600	11,255	7,862	5,811	5,541	4,907	4,241	64,025
	Application Denied	1,654	2,228	2,534	1,572	972	646	632	642	10,880
	Denial Rate	12.3%	15.0%	18.4%	16.7%	14.3%	10.4%	11.4%	13.1%	14.5%

Table 19.C.14
Loan Applications by Income and Race/Ethnicity of Applicant: Originated and Denied
 19. Remainder of Cuyahoga County
 2004–2011 HMDA Data

Race		<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	> \$75K	Data Missing	Total
American Indian	Loan Originated	0	6	28	33	22	54	3	146
	Application Denied	0	7	3	6	5	20	2	43
	Denial Rate	%	53.8%	9.7%	15.4%	18.5%	27.0%	40.0%	22.8%
Asian	Loan Originated	4	81	265	326	276	1,270	54	2,276
	Application Denied	7	25	41	30	33	105	7	248
	Denial Rate	63.6%	23.6%	13.4%	8.4%	10.7%	7.6%	11.5%	9.8%
Black	Loan Originated	11	902	2,488	2,038	1,098	1,803	153	8,493
	Application Denied	37	622	1,107	778	403	782	89	3,818
	Denial Rate	77.1%	40.8%	30.8%	27.6%	26.8%	30.3%	36.8%	31.0%
White	Loan Originated	108	2,862	8,585	9,015	6,734	19,953	1,582	48,839
	Application Denied	102	638	1,101	1,025	712	1,540	193	5,311
	Denial Rate	48.6%	18.2%	11.4%	10.2%	9.6%	7.2%	10.9%	9.8%
Not Available	Loan Originated	21	236	689	705	510	1,920	150	4,231
	Application Denied	27	208	325	251	150	380	115	1,456
	Denial Rate	56.3%	46.8%	32.1%	26.3%	22.7%	16.5%	43.4%	25.6%
Not Applicable	Loan Originated	0	0	4	4	5	25	2	40
	Application Denied	0	1	0	1	0	1	1	4
	Denial Rate	%	100.0%	.0%	20.0%	.0%	3.8%	33.3%	9.1%
Total	Loan Originated	144	4,087	12,059	12,121	8,645	25,025	1,944	64,025
	Application Denied	173	1,501	2,577	2,091	1,303	2,828	407	10,880
	Denial Rate	54.6%	26.9%	17.6%	14.7%	13.1%	10.2%	17.3%	14.5%
Non-Hispanic Ethnicity	Loan Originated	124	3,701	10,921	10,952	7,803	22,174	1,711	57,386
	Application Denied	135	1,230	2,152	1,751	1,105	2,361	284	9,018
	Denial Rate	52.1%	24.9%	16.5%	13.8%	12.4%	9.6%	14.2%	13.6%
Hispanic (Ethnicity)	Loan Originated	4	87	235	207	146	396	33	1,108
	Application Denied	6	35	44	39	29	45	3	201
	Denial Rate	60.0%	28.7%	15.8%	15.9%	16.6%	10.2%	8.3%	15.4%

PREDATORY LENDING

Table 19.C.15
Originated Owner-Occupied Loans by HAL Status
 19. Remainder of Cuyahoga County
 2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Other	10,605	9,969	8,813	7,051	5,411	5,308	4,877	4,237	56,271
HAL	1,203	2,631	2,442	811	400	233	30	4	7,754
Total	11,808	12,600	11,255	7,862	5,811	5,541	4,907	4,241	64,025
Percent HAL	10.2%	20.9%	21.7%	10.3%	6.9%	4.2%	.6%	.1%	12.1%

Table 19.C.16
Loans by Loan Purpose by HAL Status
 19. Remainder of Cuyahoga County
 2004–2011 HMDA Data

Loan Purpose		2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	Other	10,605	9,969	8,813	7,051	5,411	5,308	4,877	4,237	56,271
	HAL	1,203	2,631	2,442	811	400	233	30	4	7,754
	Percent HAL	10.2%	20.9%	21.7%	10.3%	6.9%	4.2%	.6%	.1%	12.1%
Home Improvement	Other	1,290	1,530	1,693	1,552	1,064	507	460	503	8,599
	HAL	233	285	340	231	108	60	31	18	1,306
	Percent HAL	15.3%	15.7%	16.7%	13.0%	9.2%	10.6%	6.3%	3.5%	13.2%
Refinancing	Other	12,035	9,125	6,691	5,472	4,619	10,373	10,961	9,408	68,684
	HAL	1,787	2,896	2,611	1,214	443	314	52	38	9,355
	Percent HAL	12.9%	24.1%	28.1%	18.2%	8.8%	2.9%	.5%	.4%	12.0%
Total	Other	23,930	20,624	17,197	14,075	11,094	16,188	16,298	14,148	133,554
	HAL	3,223	5,812	5,393	2,256	400	233	30	4	18,415
	Percent HAL	11.9%	22.0%	23.9%	13.8%	7.9%	3.6%	.7%	.4%	12.1%

Table 19.C.17
HALs Originated by Race of Borrower
 19. Remainder of Cuyahoga County
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	2	5	12	1	1	1	0	0	22
Asian	10	28	28	13	5	5	0	0	89
Black	457	965	1,075	309	98	56	6	0	2,966
White	582	1,264	1,124	423	278	165	23	3	3,862
Not Available	150	369	203	65	18	6	1	1	813
Not Applicable	2	0	0	0	0	0	0	0	2
Total	1,203	2,631	2,442	811	400	233	30	4	7,754
Hispanic (Ethnicity)	22	33	62	24	15	3	0	1	160

Table 19.C.18
Rate of HALs Originated by Race/Ethnicity of Borrower
 19. Remainder of Cuyahoga County
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	7.7%	17.9%	41.4%	4.2%	10.0%	7.1%	.0%	.0%	15.1%
Asian	2.7%	6.2%	8.3%	4.2%	2.5%	2.2%	.0%	.0%	3.9%
Black	29.2%	52.8%	59.2%	31.3%	13.3%	9.5%	1.1%	.0%	34.9%
White	6.4%	13.4%	13.5%	7.1%	6.2%	3.8%	.6%	.1%	7.9%
Not Available	22.5%	44.0%	28.5%	12.0%	4.4%	1.8%	.3%	.3%	19.2%
Not Applicable	8.0%	.0%	.0%	.0%	.0%	%	.0%	.0%	5%
Average	10.2%	20.9%	21.7%	10.3%	6.9%	4.2%	0.6%	0.1%	12.1%
Non-Hispanic Ethnicity	9.4%	18.6%	21.1%	10.1%	6.9%	4.3%	.7%	.1%	11.4%
Hispanic (Ethnicity)	11.8%	18.6%	28.8%	16.1%	17.4%	3.0%	.0%	1.1%	14.4%

Table 19.C.19
Loans by HAL Status by Race/Ethnicity of Borrower
 19. Remainder of Cuyahoga County
 2004–2011 HMDA Data

Race	Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Other	24	23	17	23	9	13	10	5	124
	HAL	2	5	12	1	1	1	0	0	22
	Percent HAL	7.7%	17.9%	41.4%	4.2%	10.0%	7.1%	.0%	.0%	15.1%
Asian	Other	364	421	308	295	196	224	200	179	2,187
	HAL	10	28	28	13	5	5	0	0	89
	Percent HAL	2.7%	6.2%	8.3%	4.2%	2.5%	2.2%	.0%	.0%	3.9%
Black	Other	1,110	863	742	679	638	533	554	408	5,527
	HAL	457	965	1,075	309	98	56	6	0	2,966
	Percent HAL	29.2%	52.8%	59.2%	31.3%	13.3%	9.5%	1.1%	.0%	34.9%
White	Other	8,568	8,188	7,232	5,576	4,171	4,207	3,754	3,281	44,977
	HAL	582	1,264	1,124	423	278	165	23	3	3,862
	Percent HAL	6.4%	13.4%	13.5%	7.1%	6.2%	3.8%	0.6%	0.1%	7.9%
Not Available	Other	516	469	510	476	395	331	358	363	3,418
	HAL	150	369	203	65	18	6	1	1	813
	Percent HAL	22.5%	44.0%	28.5%	12.0%	4.4%	1.8%	.3%	.3%	19.2%
Not Applicable	Other	23	5	4	2	2	0	1	1	38
	HAL	2	0	0	0	0	0	0	0	2
	Percent HAL	8.0%	.0%	.0%	.0%	.0%	%	.0%	.0%	5.0%
Total	Other	10,605	9,969	8,813	7,051	5,411	5,308	4,877	4,237	56,271
	HAL	1,203	2,631	2,442	811	400	233	30	4	7,754
	Percent HAL	10.2%	20.9%	21.7%	10.3%	6.9%	4.2%	.6%	.1%	12.1%
Non-Hispanic Ethnicity	Other	8,869	9,286	8,149	6,438	4,944	4,891	4,430	3,813	50,820
	HAL	922	2,127	2,173	727	365	221	29	2	6,566
	Percent HAL	9.4%	18.6%	21.1%	10.1%	6.9%	4.3%	.7%	.1%	11.4%
Hispanic (Ethnicity)	Other	165	144	153	125	71	98	100	92	948
	HAL	22	33	62	24	15	3	0	1	160
	Percent HAL	11.8%	18.6%	28.8%	16.1%	17.4%	3.0%	.0%	1.1%	14.4%

Table 19.C.20
Rates of HALs by Income of Borrower
 19. Remainder of Cuyahoga County
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Average
\$15,000 or Below	3.0%	9.7%	5.9%	6.3%	9.1%	.0%	.0%	.0%	5.6%
\$15,001–\$30,000	15.1%	26.4%	25.5%	14.2%	8.9%	5.1%	1.6%	.0%	14.7%
\$30,001–\$45,000	15.0%	28.5%	31.0%	14.9%	10.7%	7.5%	.6%	.0%	17.4%
\$45,001–\$60,000	13.7%	28.7%	25.0%	13.4%	8.5%	4.3%	.5%	.3%	15.5%
\$60,001–\$75,000	10.4%	20.1%	24.7%	10.1%	6.9%	4.5%	.6%	.0%	12.8%
Above \$75,000	5.5%	12.5%	13.9%	6.3%	3.9%	2.0%	0.5%	.1%	7.1%
Data Missing	4.6%	18.2%	27.2%	19.6%	6.3%	2.6%	.0%	.0%	14.2%
Average	10.2%	20.9%	21.7%	10.3%	6.9%	4.2%	.6%	.1%	12.1%

Table 19.C.21
Loans by HAL Status by Income of Borrower
 19. Remainder of Cuyahoga County
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Other	32	28	32	15	10	5	8	6	136
	HAL	1	3	2	1	1	0	0	0	8
	Percent HAL	3.0%	9.7%	5.9%	6.3%	9.1%	.0%	.0%	.0%	5.6%
\$15,001–\$30,000	Other	686	582	432	382	317	406	359	322	3,486
	HAL	122	209	148	63	31	22	6	0	601
	Percent HAL	15.1%	26.4%	25.5%	14.2%	8.9%	5.1%	1.6%	.0%	14.7%
\$30,001–\$45,000	Other	1,922	1,758	1,425	1,162	1,034	1,064	858	738	9,961
	HAL	338	701	640	204	124	86	5	0	2,098
	Percent HAL	15.0%	28.5%	31.0%	14.9%	10.7%	7.5%	.6%	.0%	17.4%
\$45,001–\$60,000	Other	2,012	1,720	1,578	1,244	996	1,106	857	728	10,241
	HAL	319	692	527	193	93	50	4	2	1,880
	Percent HAL	13.7%	28.7%	25.0%	13.4%	8.5%	4.3%	.5%	.3%	15.5%
\$60,001–\$75,000	Other	1,455	1,447	1,164	910	738	681	616	528	7,539
	HAL	169	363	381	102	55	32	4	0	1,106
	Percent HAL	10.4%	20.1%	24.7%	10.1%	6.9%	4.5%	.6%	.0%	12.8%
Above \$75,000	Other	3,919	4,056	3,848	3,203	2,257	1,972	2,123	1,862	23,240
	HAL	226	579	619	215	92	41	11	2	1,785
	Percent HAL	5.5%	12.5%	13.9%	6.3%	3.9%	2.0%	.5%	.1%	7.1%
Data Missing	Other	579	378	334	135	59	74	56	53	1,668
	HAL	28	84	125	33	4	2	0	0	276
	Percent HAL	4.6%	18.2%	27.2%	19.6%	6.3%	2.6%	.0%	.0%	14.2%
Total	Other	10,605	9,969	8,813	7,051	5,411	5,308	4,877	4,237	56,271
	HAL	1,203	2,631	2,442	811	400	233	30	4	7,754
	Percent HAL	10.2%	20.9%	21.7%	10.3%	6.9%	4.2%	.6%	.1%	12.1%

D. CRA DATA

Additional data tables related to Community Reinvestment Act (CRA) data are presented in this section.

Table 19.D.1
Small Business Loans Originated: \$100,000 or Less by Tract MFI
 19. Remainder of Cuyahoga County
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	0	208	4,264	7,566	0	12,038
2001	0	232	5,121	7,865	0	13,218
2002	0	289	5,875	9,318	0	15,482
2003	0	781	5,671	10,242	0	16,694
2004	0	772	5,680	9,960	0	16,412
2005	0	853	5,806	10,733	0	17,392
2006	0	1,191	8,490	16,934	0	26,615
2007	0	1,158	8,922	18,840	0	28,920
2008	0	989	6,748	14,534	0	22,271
2009	0	460	2,998	6,585	0	10,043
2010	0	420	2,751	5,982	0	9,153
2011	0	487	3,334	7,267	0	11,088
Total	0	7,840	65,660	125,826	0	199,326
Loan Amount (\$1,000s)						
2000	0	2,777	55,412	89,801	0	147,990
2001	0	3,140	59,287	92,069	0	154,496
2002	0	4,365	68,032	113,260	0	185,657
2003	0	8,780	64,599	111,044	0	184,423
2004	0	9,773	61,572	112,931	0	184,276
2005	0	11,732	73,442	134,074	0	219,248
2006	0	12,797	89,932	176,929	0	279,658
2007	0	12,814	93,833	203,013	0	309,660
2008	0	11,656	75,528	159,813	0	246,997
2009	0	7,318	41,786	81,777	0	130,881
2010	0	6,846	43,590	86,699	0	137,135
2011	0	8,213	53,029	108,123	0	169,365
Total	0	100,211	780,042	1,469,533	0	2,349,786

Table 19.D.2
Small Business Loans Originated: \$100,001 to \$250,000 by Tract MFI
 19. Remainder of Cuyahoga County
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	0	12	175	276	0	463
2001	0	16	216	354	0	586
2002	0	19	239	450	0	708
2003	0	33	199	352	0	584
2004	0	36	174	346	0	556
2005	0	40	178	355	0	573
2006	0	38	170	335	0	543
2007	0	36	184	291	0	511
2008	0	29	177	308	0	514
2009	0	29	137	236	0	402
2010	0	22	189	329	0	540
2011	0	27	188	335	0	550
Total	0	337	2,226	3,967	0	6,530
Loan Amount (\$1,000s)						
2000	0	2,307	30,822	48,233	0	81,362
2001	0	3,288	39,808	63,610	0	106,706
2002	0	3,901	43,944	78,552	0	126,397
2003	0	6,284	36,444	62,461	0	105,189
2004	0	6,954	31,496	61,980	0	100,430
2005	0	7,474	32,885	63,341	0	103,700
2006	0	6,580	31,062	59,783	0	97,425
2007	0	6,462	33,684	51,571	0	91,717
2008	0	5,278	30,879	54,816	0	90,973
2009	0	5,096	24,857	41,553	0	71,506
2010	0	3,846	35,745	58,595	0	98,186
2011	0	4,480	33,915	60,220	0	98,615
Total	0	61,950	405,541	704,715	0	1,172,206

Table 19.D.3
Small Business Loans Originated: More than \$250,000 by Tract MFI
 19. Remainder of Cuyahoga County
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	0	11	196	284	0	491
2001	0	19	262	366	0	647
2002	0	27	304	480	0	811
2003	0	46	243	394	0	683
2004	0	60	251	418	0	729
2005	0	44	256	451	0	751
2006	0	50	214	429	0	693
2007	0	35	219	377	0	631
2008	0	51	158	356	0	565
2009	0	38	167	308	0	513
2010	0	60	236	419	0	715
2011	0	51	214	368	0	633
Total	0	492	2,720	4,650	0	7,862
Loan Amount (\$1,000s)						
2000	0	6,652	100,594	151,686	0	258,932
2001	0	10,440	139,293	203,672	0	353,405
2002	0	17,443	167,685	261,778	0	446,906
2003	0	26,408	127,461	219,842	0	373,711
2004	0	36,426	135,865	229,221	0	401,512
2005	0	24,071	141,621	257,222	0	422,914
2006	0	29,838	121,789	243,884	0	395,511
2007	0	19,077	116,474	221,137	0	356,688
2008	0	30,274	85,730	204,025	0	320,029
2009	0	22,723	89,066	170,254	0	282,043
2010	0	37,248	134,495	234,692	0	406,435
2011	0	29,002	113,190	192,128	0	334,320
Total	0	289,602	1,473,263	2,589,541	0	4,352,406

Table 19.D.4
Small Business Loans to Businesses with Gross Annual Revenues of Less Than
\$1 Million by Tract MFI
 19. Remainder of Cuyahoga County
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	0	71	1,656	2,933	0	4,660
2001	0	131	2,239	3,478	0	5,848
2002	0	109	1,608	2,852	0	4,569
2003	0	274	1,887	3,611	0	5,772
2004	0	279	1,826	3,493	0	5,598
2005	0	354	2,701	5,173	0	8,228
2006	0	381	3,177	6,022	0	9,580
2007	0	418	3,289	6,486	0	10,193
2008	0	291	2,111	4,028	0	6,430
2009	0	168	1,153	2,136	0	3,457
2010	0	152	1,036	2,004	0	3,192
2011	0	208	1,487	3,283	0	4,978
Total	0	2,836	24,170	45,499	0	72,505
Loan Amount (\$1,000s)						
2000	0	3,171	73,137	126,963	0	203,271
2001	0	6,719	83,423	151,699	0	241,841
2002	0	14,006	108,367	197,377	0	319,750
2003	0	13,922	89,430	159,923	0	263,275
2004	0	16,692	74,385	140,246	0	231,323
2005	0	14,458	86,343	166,659	0	267,460
2006	0	8,514	91,216	178,458	0	278,188
2007	0	10,211	81,659	158,743	0	250,613
2008	0	10,024	54,358	115,820	0	180,202
2009	0	7,571	40,750	76,840	0	125,161
2010	0	8,522	44,906	96,151	0	149,579
2011	0	11,043	46,084	102,217	0	159,344
Total	0	124,853	874,058	1,671,096	0	2,670,007

E. COMPLAINT DATA

This section contains data regarding fair housing complaints, as provided by the U.S. Department of Housing and Urban Development (HUD), the Ohio Civil Rights Commission (OCRC), the Fair Housing Contact Service (FHCS), and the Fair Housing Resource Center (FHRC).

HUD COMPLAINTS

Table 19.E.1
Fair Housing Complaints by Basis
 19. Remainder of Cuyahoga County
 2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color	0	1		0	0	0			0	1
Disability	7	7	12	7	16	9	10	16	5	89
Family Status	4	3	11	3	2	14	4	16	8	65
National Origin	1	2	6	5	18	5	6	2	0	45
Race	12	8	8	13	26	23	7	11	5	113
Religion	0	0	0	1	0		0	2	0	3
Sex	0	1	2	0	0	7	9	3	2	24
Total Bases	24	22	39	29	62	58	36	50	20	340
Total Complaints	21	19	31	23	45	54	36	40	19	288

Table 19.E.2
Fair Housing Complaints by Issue
 19. Remainder of Cuyahoga County
 2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Discrimination in services and facilities relating to rental			0	2	0	2	3	2		9
False denial or representation of availability - rental			2		1	4	0	1		8
Discriminatory financing (includes real estate transactions)	1		2	3	2	0			0	8
Otherwise deny or make housing available			0	1		2	1	3		7
Discrimination in terms, conditions or privileges relating to rental	2	7	7	8	7	13	9	7	4	64
Non-compliance with design and construction requirements (handicap)	0		1		0	3	1	1		6
Discriminatory refusal to rent	10	6	6	3	14	3	5	3	4	54
Discriminatory terms, conditions, privileges, or services and facilities	0	1	6	5	12	8	8	11	2	53
False denial or representation of availability			2		3					5
Other discriminatory acts	1	0		0	0		0	2	2	5
Using ordinances to discriminate in zoning and land use	1	1	0		3					5
Failure to make reasonable accommodation	3	3	7	4	7	2	6	12	3	47
Discriminatory refusal to sell	1		1	1	0	0	1			4
Discriminatory refusal to negotiate for rental			0	0	1	2	1			4
Discrimination in terms, conditions, privileges relating to sale	2		0		0	1	1			4
Discriminatory advertising - sale					1	2				3
Discriminatory advertising, statements, and notices	2	1	2	3	1	3	2	10	4	28
Discriminatory advertisement - rental		0	2		0	10	2	7	5	26
Discriminatory acts under Section 818 (coercion, etc.)	2	4	4	2	0	3	3	6	2	26
Discrimination in the terms or conditions for making loans	0		1	0		0	1			2
Steering			0		0	2	0			2
Failure to permit reasonable modification	1	1	0		0		0			2
Discriminatory refusal to rent and negotiate for rental	1	2	4	0	2	5	2	0	1	17
Discriminatory refusal to sell and negotiate for sale	1					0	0			1
Discrimination in making of loans		0		0	0	0	1	0		1
Discrimination in the selling of residential real property					1		0			1
Discrimination in services and facilities relating to sale						0	1			1
Redlining - insurance	0				1					1
Redlining - mortgage			1							1
Failure to provide accessible and usable public and common user areas	0		1							1
Total Issues	28	26	49	32	56	65	48	65	27	396
Total Complaints	21	19	31	23	45	54	36	40	19	288

Table 19.E.3
Fair Housing Complaints by Closure Status
 19. Remainder of Cuyahoga County
 2004–2012 HUD Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Administrative Closure	3	3	2	4	6	11	9	0	0	38
Cause (FHAP)	1	3	6	1	2	13	3	8	2	39
Charged (HUD)						1				1
Conciliated / Settled	10	5	14	8	16	14	19	10	2	98
DOJ Closure	1				3					4
No Cause	6	8	9	10	18	14	5	12		82
Open						1		10	15	26
Total Complaints	21	19	31	23	45	54	36	40	19	288

HUD Complaints Found With Cause

Table 19.E.4
Fair Housing Complaints Found With Cause by Basis
 19. Remainder of Cuyahoga County
 2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability	4	5	6	4	8	4	5	7	1	44
Family Status	4	1	10	3	1	12	3	9	3	46
National Origin			4	0	9	2	3	1		19
Race	5	1	6	3	12	8	4	3	0	42
Religion	0	0	0		0			2		2
Sex	0	1		0	0	5	7	0	0	13
Total Bases	13	8	26	10	30	31	22	22	4	166
Total Complaints	12	8	20	9	21	28	22	18	4	142

Table 19.E.5
Fair Housing Complaints Found With Cause by Issue
 19. Remainder of Cuyahoga County
 2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Discriminatory acts under Section 818 (coercion, etc.)		0	0	2	0	0	3	1	2	8
False denial or representation of availability - rental				1		1	3	0		5
False denial or representation of availability				2		2				4
Using ordinances to discriminate in zoning and land use	1		0		3					4
Discriminatory refusal to rent	6	2	5	3	8	3	2	2	1	32
Discrimination in services and facilities relating to rental			0			1	2			3
Non-compliance with design and construction requirements (handicap)	0		1		0		1	1		3
Discrimination in terms, conditions or privileges relating to rental	0	2	4	4	3	4	5	3	0	25
Failure to make reasonable accommodation	3	3	2	3	4	2	3	5	0	25
Discriminatory refusal to sell			1				1			2
Discriminatory refusal to negotiate for rental			0			2				2
Discrimination in terms, conditions, privileges relating to sale	1						1			2
Otherwise deny or make housing available			0			0	0	2		2
Other discriminatory acts	0			0	0		0	1	1	2
Failure to permit reasonable modification	1	1	0		0					2
Discriminatory advertisement - rental			2		0	9	2	3	3	19
Discriminatory advertising, statements, and notices	2	1	2	2	1	3	0	7	0	18
Discriminatory terms, conditions, privileges, or services and facilities		0	3	1	6	4	3	1	0	18
Discriminatory refusal to rent and negotiate for rental	1	2	3	0	2	2	2	0		12
Discriminatory advertising - sale						1				1
Discrimination in making of loans		0		0	0		1			1
Discrimination in services and facilities relating to sale							1			1
Steering						1	0			1
Failure to provide accessible and usable public and common user areas			1							1
Total Issues	15	11	29	13	30	38	25	27	5	193
Total Complaints	12	8	20	9	21	28	22	18	4	142

OHIO CIVIL RIGHTS COMMISSION COMPLAINTS

Table 19.E.6
Fair Housing Complaints by Basis
 19. Remainder of Cuyahoga County
 2004–2012 OCRRC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color	0	0		0	0	0		1		1

Disability	9	9	25	8	19	11	12	15	2	110
Family Status	3	3	3	2	6	6	8	7	0	38
Gender	2	1	4	6	1	5	9	6	2	36
National Origin	1	2	4	5	18	2	4	3		39
Race	12	10	12	19	15	15	15	11	2	118
Religion	0	1	0	1			0	2		4
Retaliation	1	2	3	4	4	1	3	7	0	25
Other				1	1	1		0		3
Total Bases	28	28	51	46	71	41	51	52	6	374
Total Complaints	25	22	44	33	47	36	46	33	4	290

Table 19.E.7
Fair Housing Complaints by Issue
 19. Remainder of Cuyahoga County
 2004–2012 OCRRC Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Advertising	3	0	0		1	3	4	4	0	15
Exclusion	7	9	4	7	16	1	3			47
Harassment	2	2	3	5	3	7	2	1	1	26
Intimidation	1	1	0	2	0	0	2	1	1	8
Maternity				1						1
Other	8	4	18	11	11	14	25	13	0	104
Reasonable Accommodation	6	4	13	2	8	4	7	5	1	50
Recall			0							0
Sexual Harassment	0	0	0	0	1	0	0	1	1	3
Terms and Conditions	5	8	10	12	21	9	10	13	2	90
Total Issues	32	28	48	40	61	38	53	38	6	344
Total Complaints	25	22	44	33	47	36	46	33	4	290

Table 19.E.8
Fair Housing Complaints by Closure Status
 19. Remainder of Cuyahoga County
 2004–2012 OCRRC Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Administrative Closure	0	0		0	0	1	1	0	1	3
CP Failed to Cooperate		0	0	1	0	1	6	1		9
CP Refused Full Relief			5							5
CP Withdrawal – No Benefit	3	2	2	4	3	3	6	0		23
Failure to Locate Charging Party	0		1		0					1
No Cause Finding Issued	10	9	14	18	16	12	7	14	1	101
No Jurisdiction		1	2	1	2	3	1			10
Open Charge Closed By Legal Activity			2		1					3
Settlement With Benefits	4	4	9	5	13	13	13	12	0	73
Successful Conciliation	1	0	2	0	3	0	2	1		9
Withdrawal With Benefits	7	6	7	4	9	3	10	5	2	53
Total Complaints	25	22	44	33	47	36	46	33	4	290

FAIR HOUSING CONTACT SERVICE COMPLAINTS

Table 19.E.9
Fair Housing Complaints by Basis
 19. Remainder of Cuyahoga County
 2004–2012 FHCS Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Ancestry	1									1
Color	1			0						1
Disability	1									1
Race	1			0						1

Total Bases	4	0	0	0	0	0	0	0	0	4
Total Complaints	1	0	0	0	0	0	0	0	0	1

Table 19.E.10
Fair Housing Complaints by Closure Status
 19. Remainder of Cuyahoga County
 2004–2012 FHCS Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Missing	1									1
Total Complaints	1	0	0	0	0	0	0	0	0	1

FAIR HOUSING RESOURCE CENTER COMPLAINTS

Table 19.E.11
Fair Housing Complaints by Basis
 19. Remainder of Cuyahoga County
 2004– 2012 FHRC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability	0	3	1	0		0	0			4
Other				1				1		2
Total Bases	0	3	1	1	0	0	0	1	0	6
Total Complaints	0	3	1	1	0	0	0	1	0	6

Table 19.E.12
Fair Housing Complaints by Issue Type
 19. Remainder of Cuyahoga County
 2004– 2012 FHRC Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Rental	0	3	1	1		0	0	1		6
Total	0	3	1	1	0	0	0	1	0	6

Table 19.E.13
Fair Housing Complaints by Closure Status
 19. Remainder of Cuyahoga County
 2004– 2012 FHRC Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Settled through counseling	0	3	0	1		0	0	1		5
Referred to OCRC			1							1
Total	0	3	1	1	0	0	0	1	0	6

THE HOUSING RESEARCH AND ADVOCACY CENTER

Table 19.E.14
Fair Housing Complaints by Basis

19 Remainder of Cuyahoga County
2004–2012 HRAC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability	1		3	6	10	7	17	16	18	78
Race	0	4	5	7	15	5	8	6	10	60
Familial Status	0	0	3	1	2	4	5	3	1	19
Color				1					10	11
Gender			1	1		2	0	1	2	7
National Origin	0		0	0	1		2	2	2	7
Other									4	4
Age						0	1		2	3
Ethnicity								1	2	3
Retaliation					2		1			3
Sex			0		0	1	1	1	0	3
Religion					0	1	1		0	2
N.A.								1		1
Sexual Orientation			0		0		1	0		1
Source of Income			1	0	0					1
Total Bases	1	4	13	16	30	20	37	31	51	203
Total Complaints	1	4	9	16	27	19	29	29	35	169

Table 19.E.15
Fair Housing Complaints by Issue

19 Remainder of Cuyahoga County
2004–2012 HRAC Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Rental	1	3	8	15	25	19	27	27	27	152
Sale		1	1	0	1		1	2	2	8
Other			0	1	1	0	1		4	7
Mortgage					0				2	2
Total	1	4	9	16	27	19	29	29	35	169
Total Complaints	1	4	9	16	27	19	29	29	35	169

Table 19.E.16
Fair Housing Complaints by Action Taken

19 Remainder of Cuyahoga County
 2004–2012 HRAC Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Referred to OCRC	1	3	5	12	20	4	9	9	16	79
Fair Housing Info Given			1	2	3	8	5	11	21	51
HRAC Conducted Test		3	4	2	9	2	0	2	1	23
Reasonable Accommodation	0		0	0	2	2	6	10	2	22
Referred to City			1			2	3	0	4	10
Referred to Attorney	0			1	1	0	4	1		7
Agency complaint with OCRC		0	1	0				1	1	3
Total	1	6	12	17	35	18	27	34	45	195
Total Complaints	1	4	9	16	27	19	29	29	35	169

F. FAIR HOUSING SURVEY FOR HOUSING STAKEHOLDERS DATA

This section presents public involvement data gathered through the 2012–2013 Fair Housing Survey for Housing Stakeholders.

Table 19.F.1

Primary Role of Respondent

19. Remainder of Cuyahoga County
 2012–2013 Fair Housing Survey for Housing
 Stakeholders Data

Primary Role	Total
Local Government	2
Real Estate	2
Other Role	2
Advocate/Service Provider	1
Construction/Development	1
Property Management	1
Total	9

FEDERAL, STATE, AND LOCAL LAWS

Table 19.F.2
**Familiarity with Fair
 Housing Laws**

19. Remainder of Cuyahoga
 County
 2012–2013 Fair Housing Survey
 for Housing Stakeholders Data

Familiarity	Total
Not Familiar	0
Somewhat Familiar	4
Very Familiar	2
Missing	3
Total	9

Table 19.F.3
Perceptions About Fair Housing Laws

19. Remainder of Cuyahoga County
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?	5	1	0	3	9
Are fair housing laws difficult to understand or follow?	0	3	3	3	9
Do you think fair housing laws should be changed?	0	3	3	3	9
Do you think fair housing laws are adequately enforced?	3	2	0	4	9

Table 19.F.4

Fair Housing Activities

19. Remainder of Cuyahoga County
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?		3	2	0	4	9
Have you participated in fair housing training?		2	1		6	9
Are you aware of any fair housing testing?		2	2	1	4	9
Testing and education	Too Little	Right Amount	Too Much	Don't Know	Missing	Total
Is there sufficient outreach and education activity?	3	0	0	1	5	9
Is there sufficient testing?	0	2		3	4	9

Table 19.F.5

Protected Classes

19. Remainder of Cuyahoga County
2012–2013 Fair Housing Survey for Housing Stakeholders Data

Protected Class	Total
Religion	3
Family Status	2
Sexual Orientation	2
Gender	1
Ethnicity	1
Other	1
Total	10

Table 19.F.6

Fair Housing Violation Referrals

19. Remainder of Cuyahoga County
2012–2013 Fair Housing Survey for Housing Stakeholders Data

Referral	Total
Don't Know	1
Heights Community Congress	1
Housing Research and Advocacy Center	1
Total	3

LOCAL FAIR HOUSING

Table 19.F.7

Local Fair Housing

19. Remainder of Cuyahoga County
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?	2	2	0	5	9

Are there any specific geographic areas that have fair housing problems?	0	4	0	5	9
Are there any specific groups in that face housing discrimination?	1	2	1	5	9

FAIR HOUSING IN THE PRIVATE SECTOR

Table 19.F.8

Barriers to Fair Housing in the Private Sector

19. Remainder of Cuyahoga County
2012–2013 Fair Housing Survey for Housing Stakeholders Data

Question	Yes	No	Don't Know	Missing	Total
Are you aware of any questionable practices or barriers to fair housing choice in:					
The rental housing market?	1	3	1	4	9
The real estate industry?	2	2	1	4	9
The mortgage and home lending industry?	2	1	2	4	9
The housing construction or accessible housing design fields?	1	1	2	5	9
The home insurance industry?	1	0	3	5	9
The home appraisal industry?	3	0	1	5	9
Any other housing services?	0	2	2	5	9

FAIR HOUSING IN THE PUBLIC SECTOR

Table 19.F.9

Barriers to Fair Housing in the Public Sector

19. Remainder of Cuyahoga County
2012–2013 Fair Housing Survey for Housing Stakeholders Data

Question	Yes	No	Don't Know	Missing	Total
Are you aware of any questionable practices or barriers to fair housing choice in:					
Land use policies?	0	3	1	5	9
Zoning laws?	1	2	1	5	9
Occupancy standards or health and safety codes?	1	3	0	5	9
Property tax policies?	0	3	1	5	9
Permitting process?	0	3	1	5	9
Housing construction standards?	0	3	0	6	9
Neighborhood or community development policies?	0	4	0	5	9
Limited access to government services, such as employment services?	0	4	0	5	9
Public administrative actions or regulations?	0	4	0	5	9

NARRATIVE COMMENTS

Federal, State, and Local Laws

Table 19.10

How did you become aware of fair housing laws?

19. Remainder of Cuyahoga County
2013 Fair Housing Survey Data

Comments:
experience
I hold a real estate license in Ohio and it is a requirement of licensing.
Working with city government

Fair Housing in the Private Sector

Table 19.F.11

Are you aware of any questionable practices or barriers to fair housing choice in the rental housing market?

19. Remainder of Cuyahoga County
2013 Fair Housing Survey Data

Comments:
I think it is arbitrary that rental properties under 3 units is exempt from Fair Housing practices

Table 19.F.12

Are you aware of any questionable practices or barriers to fair housing choice in the real estate industry?

19. Remainder of Cuyahoga County
2013 Fair Housing Survey Data

Comments:
see above

Table 19.F.13

Are you aware of any questionable practices or barriers to fair housing choice in the mortgage and home lending industry?

19. Remainder of Cuyahoga County
2013 Fair Housing Survey Data

Comments:
Women and racial minorities have higher interest rate and are denied loan modifications at a higher rate than Whites.

Table 19.F.14

Are you aware of any questionable practices or barriers to fair housing choice in the housing construction or accessible housing design fields?

19. Remainder of Cuyahoga County
2013 Fair Housing Survey Data

Comments:
When buildings are accessible it is often side, hard to get to entrance.

Table 19.F.15

Are you aware of any questionable practices or barriers to fair housing choice in the home appraisal industry?

19. Remainder of Cuyahoga County
2013 Fair Housing Survey Data

Comments:
I think the appraisal industry is fully out of whack and contributing to the slow housing market. They have over-corrected and hampering sales and legitimate increase in values which hurts everyone In the past Black neighborhoods had houses appraised to high and now with the decline they have declined in value at a greater percentage than similar 'white' neighborhoods

G. LAND USE PLANNING SURVEY DATA

This section contains data regarding the potential effects of local land use and housing policies on fair housing choice, as gathered from the Fair Housing Survey for Government Officials.

FAIR HOUSING SURVEY FOR GOVERNMENT OFFICIALS

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

was conducted predominately online. Respondents were solicited by mass-distributed emails sent by the NEOSCC, members of the Progress Review Team, and other various organizations in the 12-county region.

This section contains data gathered from the public sector staff in the Remainder of Cuyahoga County that received and completed the survey.⁷⁶

⁷⁶ For areas with both nonentitlement and entitlement communities, the results of the nonentitlement community government official survey and the entitlement community interviews were summed.

Table 19.G.1
Housing Development
 19. Remainder of Cuyahoga County
 2012 Fair Housing Survey for Government Officials Data

Question: Does your jurisdiction have...	Yes	No	Don't Know	Missing	Total
Housing Development					
Definitions for "dwelling unit" or "residential unit"?	7		2	13	22
Guidelines that encourage development affordable housing units?	3	4	2	13	22
Any potential barriers to the development of low- to moderate- income housing?		4	5	13	22
Guidelines that allow the development of mixed use housing?	3	4	2	13	22
Any potential barriers to the development of mixed use housing?	3	1	5	13	22
Occupancy Standards					
A definition for the term "family"?	6		3	13	22
Residential occupancy standards or limits?	3		5	14	22
Special Needs Housing					
A definition for the term "disability"?	1	5	2	14	22
Development standards for making housing accessible to persons with disabilities?	3	2	3	14	22
A process by which persons with disabilities can request modification to the jurisdiction's policies?	3	3	2	14	22
Standards for the development of senior housing?	4	2	2	14	22
Guidelines that distinguish senior citizen housing from other residential uses?	4	1	3	14	22
Guidelines for developing housing for any other special needs populations?	3	2	3	14	22
Fair Housing Policies					
A fair housing ordinance, policy, or regulation?	5	1	2	14	22
Policies or practices for "affirmatively furthering fair housing"?	4	2	2	14	22

H. IMPEDIMENTS

The 2013 Northeast Ohio Regional Analysis of Impediments to Fair Housing Choice uncovered several potential issues regarding fair housing in the Remainder of Cuyahoga County. Identification of these items as probable impediments to fair housing choice was based on HUD's definition of impediments as actions, omissions, or decisions that restrict housing choice due to protected class status or actions, omissions, or decisions that have this effect. The identified impediments are supported by evidence uncovered during the Regional AI process, with impediments of higher need being those identified in multiple sources.

These probable impediments in the entirety of the Northeast Ohio Region are presented in **Volumes I** and **II** of the Regional AI. They are accompanied by suggested actions that jurisdictions in the Region may implement in order to alleviate or eliminate these impediments, and are accompanied by measurable objectives. The goal of these actions and measurable objectives is to assist these agencies in offering greater housing choice for all citizens of the Northeast Ohio Region.

The following list presents the private and public sector impediments found in the Remainder of Cuyahoga County.

PRIVATE SECTOR

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

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

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

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

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

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

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

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

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

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

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

Suggestion: Additional training for landlords and property managers.

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

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

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

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

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

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

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

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

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

8. *Impediment: Denial of home purchase loans*

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

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

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

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

Suggestion: Utilize resources for first-time and lower-income homebuyers that belong to race, ethnic, and gender protected classes so that they can improve their credit 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 in the remainder of Cuyahoga County.

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 in the remainder of Cuyahoga County.

Suggestion: Construct a regional 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 in the remainder of Cuyahoga County. 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 in the remainder of Cuyahoga County. 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, as well as in the remainder of Cuyahoga County.

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:* 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 in the remainder of Cuyahoga County. 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.

IMPEDIMENTS MATRIX

The matrix on the following page includes the impediment, data source, or sources that indicated its existence, protected classes most affected, and ranking of need for action. Level of need for action was determined based on the number of data sources that identified each impediment.

Table 19.H.1
Impediments Matrix
 19. Remainder of Cuyahoga County
 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 ⁷⁷		
Private Sector												
1	Denial of available housing units in the rental markets		X				X	X			Black and Hispanic persons	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			Disabled persons	L
Public Sector												
1	Lack of sufficient fair housing policies or practices by several units of local government							X			All	L
2	Lack of sufficient fair housing outreach and education efforts							X	X	X	All	H
3	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	All	M
5	Lack of inclusionary policies							X		X	All	M

⁷⁷ 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.

20. GEAUGA COUNTY

A. CENSUS BUREAU DATA

This section contains additional data from the U.S. Census Bureau.

Table 20.A.1

Population by Age

20. Geauga County

2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Under 5	6,157	6.8%	5,211	5.6%	-15.4%
5 to 19	21,750	23.9%	21,169	22.7%	-2.7%
20 to 24	3,714	4.1%	4,027	4.3%	8.4%
25 to 34	8,961	9.9%	7,199	7.7%	-19.7%
35 to 54	29,820	32.8%	27,745	29.7%	-7.0%
55 to 64	9,615	10.6%	13,564	14.5%	41.1%
65 or Older	10,878	12.0%	14,474	15.5%	33.1%
Total	90,895	100.0%	93,389	100.0%	2.7%

Table 20.A.2

Elderly Population by Age

20. Geauga County

2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
65 to 66	1,316	12.1%	1,956	13.5%	48.6%
67 to 69	1,839	16.9%	2,795	19.3%	52.0%
70 to 74	2,733	25.1%	3,257	22.5%	19.2%
75 to 79	2,239	20.6%	2,515	17.4%	12.3%
80 to 84	1,467	13.5%	1,979	13.7%	34.9%
85 or Older	1,284	11.8%	1,972	13.6%	53.6%
Total	10,878	100.0%	14,474	100.0%	33.1%

Table 20.A.3

Population by Race and Ethnicity

20. Geauga County

2000 & 2010 Census SF1 Data

Race	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
White	88,553	97.4%	90,514	96.9%	2.2%
Black	1,110	1.2%	1,198	1.3%	7.9%
American Indian	69	.1%	75	.1%	8.7%
Asian	385	.4%	557	.6%	44.7%
Native Hawaiian/ Pacific Islander	10	.0%	11	.0%	10.0%
Other	123	.1%	246	.3%	100.0%
Two or More Races	645	.7%	788	.8%	22.2%
Total	90,895	100.0%	93,389	100.0%	2.7%
Non-Hispanic	90,357	99.4%	92,388	98.9%	2.2%
Hispanic	538	.6%	1,001	1.1%	86.1%

Table 20.A.4
Disability by Age
 20. Geauga County
 2010 Three-Year ACS Data

Age	Male		Female		Total	
	Disabled Population	Disability Rate	Disabled Population	Disability Rate	Disabled Population	Disability Rate
Under 5	0	.0%	26	1.0%	26	.5%
5 to 17	450	4.6%	350	3.8%	800	4.2%
18 to 34	487	7.2%	339	5.1%	826	6.2%
35 to 64	1,430	7.0%	1,812	8.6%	3,242	7.8%
65 to 74	697	18.9%	633	16.3%	1,330	17.6%
75 or Older	794	35.4%	1,519	48.5%	2,313	43.0%
Total	3,858	8.5%	4,679	10.1%	8,537	9.3%

Table 20.A.5
Employment Status by Disability and Type: Age 18 to 64
 20. Geauga County
 2010 Three-Year ACS Data

Disability Status	Population
Employed:	40,722
With a disability:	1,519
With a hearing difficulty	572
With a vision difficulty	228
With a cognitive difficulty	428
With an ambulatory difficulty	338
With a self-care difficulty	89
With an independent living difficulty	329
No disability	39,203
Unemployed:	2,990
With a disability:	332
With a hearing difficulty	19
With a vision difficulty	0
With a cognitive difficulty	168
With an ambulatory difficulty	192
With a self-care difficulty	82
With an independent living difficulty	88
No disability	2,658
Not in labor force:	11,079
With a disability:	2,217
With a hearing difficulty	463
With a vision difficulty	299
With a cognitive difficulty	1,032
With an ambulatory difficulty	1,423
With a self-care difficulty	589
With an independent living difficulty	1,260
No disability	8,862
Total	54,791

Table 20.A.6**Households by Income**

20. Geauga County

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	2,278	7.2%	2,468	7.2%
\$15,000 to \$19,999	1,087	3.4%	1,291	3.8%
\$20,000 to \$24,999	1,373	4.3%	1,360	4.0%
\$25,000 to \$34,999	3,098	9.8%	2,659	7.8%
\$35,000 to \$49,999	4,802	15.2%	4,605	13.4%
\$50,000 to \$74,999	7,114	22.5%	7,296	21.3%
\$75,000 to \$99,999	4,692	14.8%	4,598	13.4%
\$100,000 or More	7,195	22.7%	10,008	29.2%
Total	31,639	100.0%	34,285	100.0%

Table 20.A.7**Poverty by Age**

20. Geauga County

2000 Census SF3 & 2010 Five-Year ACS Data

Age	2000 Census		2010 Five-Year ACS	
	Persons in Poverty	% of Total	Persons in Poverty	% of Total
Under 6	535	13.1%	878	12.5%
6 to 17	1,062	25.9%	1,805	25.6%
18 to 64	1,973	48.2%	3,561	50.6%
65 or Older	526	12.8%	800	11.4%
Total	4,096	100.0%	7,044	100.0%
Poverty Rate	4.6%	.	7.6%	.

Table 20.A.8**Households by Year Home Built**

20. Geauga County

2000 Census SF3 & 2010 Five-Year ACS Data

Year Built	2000 Census		2010 Five-Year ACS	
	Households	% of Total	Households	% of Total
1939 or Earlier	4,744	15.0%	3,932	11.5%
1940 to 1949	1,585	5.0%	1,563	4.6%
1950 to 1959	4,835	15.3%	5,075	14.8%
1960 to 1969	4,231	13.4%	3,853	11.2%
1970 to 1979	6,143	19.4%	6,513	19.0%
1980 to 1989	4,094	12.9%	4,374	12.8%
1990 to 1999	5,998	19.0%	5,580	16.3%
2000 to 2004	.	.	2,619	7.6%
2005 or Later	.	.	776	2.3%
Total	31,630	100.0%	34,285	100.0%

Table 20.A.9**Housing Units by Type**

20. Geauga County

2000 Census SF3 & 2010 Five-Year ACS Data

Unit Type	2000 Census		2010 Five-Year ACS	
	Units	% of Total	Units	% of Total
Single-Family	29,185	89.0%	32,759	90.3%
Duplex	713	2.2%	492	1.4%
Tri- or Four-Plex	359	1.1%	251	.7%
Apartment	1,167	3.6%	1,465	4.0%
Mobile Home	1,368	4.2%	1,298	3.6%
Boat, RV, Van, Etc.	13	.0%	0	.0%
Total	32,805	100.0%	36,265	100.0%

Table 20.A.10**Housing Units by Tenure**

20. Geauga County

2000 & 2010 Census SF1 Data

Tenure	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
Occupied Housing Units	31,630	96.4%	34,264	93.7%	8.3%
Owner-Occupied	27,574	87.2%	29,371	85.7%	6.5%
Renter-Occupied	4,056	12.8%	4,893	14.3%	20.6%
Vacant Housing Units	1,175	3.6%	2,310	6.3%	96.6%
Total Housing Units	32,805	100.0%	36,574	100.0%	11.5%

Table 20.A.11**Disposition of Vacant Housing Units**

20. Geauga County

2000 & 2010 Census SF1 Data

Disposition	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
For Rent	191	16.3%	441	19.1%	130.9%
For Sale	295	25.1%	623	27.0%	111.2%
Rented or Sold, Not Occupied	127	10.8%	140	6.1%	10.2%
For Seasonal, Recreational, or Occasional Use	216	18.4%	409	17.7%	89.4%
For Migrant Workers	0	.0%	1	.0%	.
Other Vacant	346	29.4%	696	30.1%	101.2%
Total	1,175	100.0%	2,310	100.0%	96.6%

Table 20.A.12**Households by Household Size**

20. Geauga County

2000 & 2010 Census SF1 Data

Size	2000 Census		2010 Census		% Change 00-10
	Households	% of Total	Households	% of Total	
One Person	5,575	17.6%	7,258	21.2%	30.2%
Two Persons	11,044	34.9%	12,605	36.8%	14.1%
Three Persons	5,415	17.1%	5,323	15.5%	-1.7%
Four Persons	5,418	17.1%	5,017	14.6%	-7.4%
Five Persons	2,528	8.0%	2,335	6.8%	-7.6%
Six Persons	923	2.9%	924	2.7%	.1%
Seven Persons or More	727	2.3%	802	2.3%	10.3%
Total	31,630	100.0%	34,264	100.0%	8.3%

Table 20.A.13
Household Type by Tenure
 20. Geauga County
 2000 & 2010 Census SF1 Data

Household Type	2000 Census		2010 Census		% Change 00–10
	Households	% of Total	Households	% of Total	
Family Households	24,997	79.0%	25,654	74.9%	2.6%
Married-Couple Family	21,782	87.1%	21,848	85.2%	.3%
Owner-Occupied	20,368	93.5%	20,506	93.9%	.7%
Renter-Occupied	1,414	6.5%	1,342	6.1%	-5.1%
Other Family	3,215	12.9%	3,806	14.8%	18.4%
Male Householder, No Spouse	936	29.1%	1,183	31.1%	26.4%
Owner-Occupied	733	78.3%	907	76.7%	23.7%
Renter-Occupied	203	21.7%	276	23.3%	36.0%
Female Householder, No Spouse	2,279	70.9%	2,623	68.9%	15.1%
Owner-Occupied	1,679	73.7%	1,877	71.6%	11.8%
Renter-Occupied	600	26.3%	746	28.4%	24.3%
Non-Family Households	6,633	21.0%	8,610	25.1%	29.8%
Owner-Occupied	4,794	72.3%	6,081	70.6%	26.8%
Renter-Occupied	1,839	27.7%	2,529	29.4%	37.5%
Total	31,630	100.0%	34,264	100.0%	8.3%

Table 20.A.14
Group Quarters Population
 20. Geauga County
 2000 & 2010 Census SF1 Data

Group Quarters Type	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Institutionalized					
Correctional Institutions	58	7.5%	48	9.9%	-17.2%
Juvenile Facilities	.	.	10	2.1%	.
Nursing Homes	542	70.3%	427	88.0%	-21.2%
Other Institutions	171	22.2%	0	.0%	-100.0%
Total	771	100.0%	485	100.0%	-37.1%
Noninstitutionalized					
College Dormitories	0	.0%	0	.0%	.
Military Quarters	0	.0%	0	.0%	.
Other Noninstitutional	276	100.0%	379	100.0%	37.3%
Total	276	26.4%	379	43.9%	37.3%
Total Group Quarters Population	1,047	100.0%	864	100.0%	-17.5%

Table 20.A.15
Overcrowding and Severe Overcrowding
 20. Geauga County
 2000 Census SF3 & 2010 Five-Year ACS Data

Data Source	No Overcrowding		Overcrowding		Severe Overcrowding		Total
	Households	% of Total	Households	% of Total	Households	% of Total	
Owner							
2000 Census	27,220	98.6%	296	1.1%	98	.4%	27,614
2010 ACS	29,397	98.6%	346	1.2%	80	.3%	29,823
Renter							
2000 Census	3,913	97.4%	71	1.8%	32	.8%	4,016
2010 ACS	4,386	98.3%	76	1.7%	0	.0%	4,462
Total							
2000 Census	31,133	98.4%	367	1.2%	130	.4%	31,630
2010 ACS	33,783	98.5%	422	1.2%	80	.2%	34,285

Table 20.A.16
Households with Incomplete Plumbing Facilities
 20. Geauga County
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Plumbing Facilities	31,445	34,097
Lacking Complete Plumbing Facilities	185	188
Total Households	31,630	34,285
Percent Lacking	.6%	.5%

Table 20.A.17
Households with Incomplete Kitchen Facilities
 20. Geauga County
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Kitchen Facilities	31,251	33,516
Lacking Complete Kitchen Facilities	379	769
Total Households	31,630	34,285
Percent Lacking	1.2%	2.2%

Table 20.A.18
Cost Burden and Severe Cost Burden by Tenure
 20. Geauga County
 2000 Census & 2010 Five-Year ACS Data

Data Source	Less Than 30%		31%-50%		Above 50%		Not Computed		Total
	Households	% of Total	Households	% of Total	Households	% of Total	Households	% of Total	
Owner With a Mortgage									
2000 Census	12,418	73.6%	3,085	18.3%	1,330	7.9%	38	.2%	16,871
2010 ACS	13,427	62.8%	5,094	23.8%	2,781	13.0%	71	.3%	21,373
Owner Without a Mortgage									
2000 Census	5,135	88.7%	320	5.5%	279	4.8%	55	1.0%	5,789
2010 ACS	6,908	81.8%	961	11.4%	462	5.5%	119	1.4%	8,450
Renter									
2000 Census	2,263	61.7%	572	15.6%	465	12.7%	366	10.0%	3,666
2010 ACS	2,260	50.6%	1,054	23.6%	761	17.1%	387	8.7%	4,462
Total									
2000 Census	19,816	75.3%	3,977	15.1%	2,074	7.9%	459	1.7%	26,326
2010 ACS	22,595	65.9%	7,109	20.7%	4,004	11.7%	577	1.7%	34,285

Table 20.A.19
Median Housing Costs
 20. Geauga County
 2000 Census SF3 & 2010 Five-Year ACS Data

Housing Cost	2000 Census	2010 ACS
Median Contract Rent	\$513	\$617
Median Home Value	\$182,400	\$230,900

B. BEA DATA

This section contains additional Bureau of Economic Analysis (BEA) data that address employment and income.

Table 20.B.1
Employment by Industry
 20. Geauga County
 Select Years 2001–2010 BEA Data

NAICS Categories	2001	2005	2006	2007	2008	2009	2010	% Change 01–10
Farm employment	1,105	960	944	940	885	892	885	-19.9%
Forestry, fishing, related activities, and other	532	606	602	(D)	702	(D)	(D)	.
Mining	178	140	156	(D)	206	(D)	(D)	.
Utilities	(D) ⁷⁸	(D)	11	12	15	(D)	(D)	.
Construction	5,226	6,282	6,201	6,106	6,033	5,617	5,387	3.1%
Manufacturing	10,109	10,327	10,548	9,818	9,661	8,074	7,755	-23.3%
Wholesale trade	1,930	2,136	2,367	2,354	2,211	2,052	2,043	5.9%
Retail trade	4,290	4,882	5,310	5,489	5,543	5,449	5,387	25.6%
Transportation and warehousing	(D)	1,002	1,012	1,076	1,000	(D)	(D)	.
Information	300	336	294	292	280	290	283	-5.7%
Finance and insurance	1,067	1,275	1,301	1,411	1,526	1,668	1,732	62.3%
Real estate and rental and leasing	1,496	1,988	1,999	2,109	2,083	1,828	1,815	21.3%
Professional and technical services	2,324	2,299	2,414	2,376	2,347	2,373	2,392	2.9%
Management of companies and enterprises	150	275	273	244	243	281	263	75.3%
Administrative and waste services	2,639	3,188	3,194	3,249	3,229	3,244	3,326	26.0%
Educational services	737	929	891	928	924	970	949	28.8%
Health care and social assistance	3,273	3,903	3,576	4,017	4,381	4,417	4,589	40.2%
Arts, entertainment, and recreation	1,587	1,137	1,077	1,087	1,131	1,029	1,051	-33.8%
Accommodation and food services	2,477	2,742	2,899	2,755	2,704	2,646	2,601	5.0%
Other services, except public administration	2,864	3,125	3,175	3,366	3,279	3,254	3,229	12.7%
Government and government enterprises	4,195	4,383	4,431	4,447	4,461	4,529	4,624	10.2%
Total	47,578	51,924	52,675	52,892	52,844	50,451	50,170	5.4%

⁷⁸ (D): These data are not shown to avoid disclosure of confidential information, but estimates are included in the totals.

Table 20.B.2
Real Earnings by Industry
 20. Geauga County

Select Years 2001–2010 BEA Data, Real 2011 Dollars

NAICS Categories	2001	2005	2006	2007	2008	2009	2010	% Change 00–10
Farm earnings	5,378	8,291	4,541	5,640	7,387	8,778	4,630	-13.9%
Forestry, fishing, related activities, and other	16,542	13,077	13,618	(D)	15,434	(D)	(D)	.
Mining	9,287	11,877	8,703	(D)	7,941	(D)	(D)	.
Utilities	(D) ⁷⁹	(D)	(D)	(D)	64	(D)	(D)	.
Construction	219,170	252,380	248,069	201,799	194,484	167,732	170,494	-22.2%
Manufacturing	544,831	591,647	585,810	546,264	535,505	472,771	483,747	-11.2%
Wholesale trade	116,170	144,060	157,754	161,875	163,339	147,439	143,551	23.6%
Retail trade	116,130	136,052	147,969	149,793	145,689	144,054	147,258	26.8%
Transportation and warehousing	(D)	49,849	48,563	49,099	43,173	(D)	(D)	.
Information	10,374	12,550	9,770	10,149	9,015	8,873	8,814	-15.0%
Finance and insurance	57,877	68,477	63,364	63,357	56,700	59,379	59,200	2.3%
Real estate and rental and leasing	17,563	22,058	24,029	22,059	28,100	24,047	29,664	68.9%
Professional and technical services	89,890	87,745	91,650	89,643	96,610	89,284	93,083	3.6%
Management of companies and enterprises	8,848	22,150	25,735	20,423	24,815	22,387	24,984	182.4%
Administrative and waste services	79,449	98,741	92,969	94,966	86,342	80,932	82,862	4.3%
Educational services	19,977	23,963	22,000	21,346	23,707	24,130	24,019	20.2%
Health care and social assistance	131,864	162,566	167,899	169,805	178,664	182,774	183,515	39.2%
Arts, entertainment, and recreation	32,171	17,683	15,891	16,538	14,955	14,386	14,156	-56.0%
Accommodation and food services	38,386	41,008	42,611	41,128	39,257	39,101	39,604	3.2%
Other services, except public administration	79,252	94,524	94,543	105,718	104,186	98,063	100,735	27.1%
Government and government enterprises	197,271	223,411	225,231	225,795	226,052	241,086	242,488	22.9%
Total	1,843,490	2,082,120	2,090,740	2,019,049	2,001,420	1,879,070	1,911,530	3.7%

⁷⁹ (D): These data are not shown to avoid disclosure of confidential information, but estimates are included in the totals.

Table 20.B.3
Real Earnings Per Job by Industry
 20. Geauga County
 Select Years 2001–2010 BEA Data, 1,000's of Real 2011 Dollars

NAICS Categories	2001	2005	2006	2007	2008	2009	2010	% Change 00–10
Farm earnings	4,867	8,637	4,810	6,000	8,347	9,841	5,231	7.5%
Forestry, fishing, related activities, and other	31,094	21,580	22,621	(D)	21,985	(D)	(D)	.
Mining	52,176	84,835	55,786	(D)	38,547	(D)	(D)	.
Utilities	(D) ⁸⁰	(D)	(D)	(D)	4,246	(D)	(D)	.
Construction	41,938	40,175	40,005	33,049	32,237	29,861	31,649	-24.5%
Manufacturing	53,896	57,291	55,538	55,639	55,430	58,555	62,379	15.7%
Wholesale trade	60,192	67,444	66,647	68,766	73,876	71,851	70,265	16.7%
Retail trade	27,070	27,868	27,866	27,290	26,283	26,437	27,336	1.0%
Transportation and warehousing	(D)	49,750	47,987	45,631	43,173	(D)	(D)	.
Information	34,581	37,352	33,231	34,756	32,197	30,598	31,146	-9.9%
Finance and insurance	54,243	53,707	48,704	44,902	37,156	35,599	34,180	-37.0%
Real estate and rental and leasing	11,740	11,095	12,021	10,460	13,490	13,155	16,344	39.2%
Professional and technical services	38,679	38,167	37,966	37,729	41,163	37,625	38,914	.6%
Management of companies and enterprises	58,983	80,544	94,266	83,702	102,120	79,670	94,997	61.1%
Administrative and waste services	30,106	30,973	29,107	29,229	26,740	24,948	24,913	-17.2%
Educational services	27,105	25,795	24,691	23,003	25,657	24,876	25,310	-6.6%
Health care and social assistance	40,289	41,652	46,951	42,272	40,782	41,380	39,990	-.7%
Arts, entertainment, and recreation	20,272	15,552	14,755	15,214	13,223	13,980	13,469	-33.6%
Accommodation and food services	15,497	14,956	14,698	14,929	14,518	14,777	15,226	-1.7%
Other services, except public administration	27,672	30,248	29,777	31,408	31,774	30,136	31,197	12.7%
Government and government enterprises	47,025	50,972	50,831	50,775	50,673	53,232	52,441	11.5%
Average	38,746	40,099	39,691	38,173	37,874	37,245	38,101	-1.66%

⁸⁰ (D): These data are not shown to avoid disclosure of confidential information, but estimates are included in the totals.

Table 20.B.4
Total Employment and Real Personal Income
 20. Geauga County
 1969–2010 BEA Data, 2011 Dollars

Year	1,000s of 2011 Dollars						Per Capita Income	Total Employment	Real Average Earnings Per Job
	Earnings	Social Security Contributions	Residents Adjustments	Dividends, Interest, Rents	Transfer Payments	Personal Income			
1969	505,459	30,872	607,930	158,340	50,299	1,291,155	20,408	15,491	32,627
1970	516,403	31,109	544,611	160,535	56,140	1,246,580	19,782	15,946	32,386
1971	563,487	35,529	538,857	163,964	65,730	1,296,509	20,508	16,877	33,386
1972	582,790	38,150	595,535	167,258	70,367	1,377,802	21,692	17,307	33,672
1973	643,744	48,852	645,182	186,702	76,548	1,503,323	22,853	19,059	33,775
1974	647,018	51,077	677,362	203,928	82,060	1,559,292	23,603	19,481	33,214
1975	614,305	46,848	670,241	199,430	97,706	1,534,833	22,661	19,410	31,648
1976	698,042	54,595	696,845	208,166	98,862	1,647,320	24,285	20,854	33,473
1977	760,947	59,787	735,813	220,544	96,853	1,754,370	24,915	22,192	34,291
1978	828,826	67,669	775,559	234,796	99,094	1,870,606	25,537	23,780	34,854
1979	845,587	72,050	838,004	269,483	100,880	1,981,905	26,923	24,570	34,416
1980	803,663	68,459	865,570	303,257	116,336	2,020,367	27,096	23,809	33,754
1981	794,735	71,942	842,038	372,781	120,154	2,057,766	27,528	23,899	33,254
1982	787,869	73,614	802,445	374,730	135,686	2,027,116	27,051	24,368	32,333
1983	825,955	79,010	798,578	398,808	145,420	2,089,752	27,800	25,385	32,536
1984	908,662	89,310	854,598	427,581	145,144	2,246,675	29,860	27,501	33,042
1985	951,890	96,628	877,446	454,811	151,943	2,339,462	30,961	29,370	32,411
1986	984,848	104,323	884,702	464,109	156,979	2,386,315	31,289	30,576	32,210
1987	1,018,841	108,048	923,871	482,984	157,603	2,475,252	32,174	32,381	31,464
1988	1,087,438	117,973	960,574	497,056	165,091	2,592,186	32,751	32,699	33,256
1989	1,149,370	125,864	1,001,390	583,315	175,093	2,783,304	34,617	33,942	33,863
1990	1,165,801	131,168	1,025,545	593,543	198,935	2,852,655	35,062	34,894	33,410
1991	1,161,997	133,331	1,027,102	566,696	216,526	2,838,990	34,528	35,245	32,969
1992	1,217,079	139,472	1,080,031	574,501	242,698	2,974,838	35,766	35,466	34,317
1993	1,281,920	147,614	1,090,924	587,634	252,991	3,065,855	37,272	36,729	34,902
1994	1,367,978	160,644	1,154,172	638,642	268,354	3,268,502	39,194	38,380	35,643
1995	1,420,339	168,829	1,210,619	664,941	278,331	3,405,402	40,151	39,879	35,616
1996	1,505,507	177,037	1,294,354	734,199	290,858	3,647,881	42,197	41,432	36,337
1997	1,584,471	182,353	1,368,815	817,184	303,740	3,891,858	44,189	43,248	36,637
1998	1,718,474	190,984	1,435,097	867,288	316,589	4,146,464	46,469	45,165	38,049
1999	1,813,007	199,283	1,485,345	891,833	327,893	4,318,795	47,941	47,000	38,575
2000	1,829,613	196,194	1,521,369	910,250	351,207	4,416,244	48,435	47,832	38,250
2001	1,843,490	196,772	1,544,246	803,278	384,489	4,378,731	47,892	47,578	38,746
2002	1,875,531	195,343	1,511,453	759,758	405,832	4,357,230	47,376	47,569	39,427
2003	1,917,437	202,730	1,570,781	765,247	421,058	4,471,793	48,062	48,516	39,522
2004	1,999,287	215,178	1,528,268	788,443	428,671	4,529,490	48,591	49,906	40,062
2005	2,082,120	224,960	1,465,537	859,679	442,250	4,624,624	49,400	51,924	40,099
2006	2,090,740	231,563	1,460,166	1,051,664	459,803	4,830,811	51,480	52,675	39,691
2007	2,019,049	225,510	1,477,449	1,019,303	484,012	4,774,304	50,930	52,892	38,173
2008	2,001,420	230,330	1,469,460	1,045,392	505,837	4,791,778	51,204	52,844	37,874
2009	1,879,070	218,804	1,420,562	811,218	565,949	4,457,994	47,706	50,451	37,245
2010	1,911,530	219,667	1,453,816	821,902	586,733	4,554,314	48,772	50,170	38,101

C. BLS DATA

This section contains Bureau of Labor Statistics (BLS) data that address employment and income.

Table 20.C.1
Labor Force Statistics
 20. Geauga County
 1990–2011 BLS Data

Year	Labor Force	Employment	Unemployment	Unemployment Rate	Statewide Unemployment Rate
1990	42,450	40,579	1,871	4.4%	5.7%
1991	41,816	39,750	2,066	4.9%	6.6%
1992	42,861	40,178	2,683	6.3%	7.4%
1993	42,777	40,375	2,402	5.6%	6.7%
1994	43,935	41,690	2,245	5.1%	5.6%
1995	44,682	42,845	1,837	4.1%	4.9%
1996	45,837	44,313	1,524	3.3%	5.0%
1997	47,353	45,877	1,476	3.1%	4.6%
1998	48,499	47,150	1,349	2.8%	4.3%
1999	49,810	48,315	1,495	3.0%	4.3%
2000	49,128	47,589	1,539	3.1%	4.0%
2001	49,482	47,778	1,704	3.4%	4.4%
2002	49,719	47,634	2,085	4.2%	5.7%
2003	50,585	48,099	2,486	4.9%	6.2%
2004	50,528	48,068	2,460	4.9%	6.1%
2005	50,937	48,478	2,459	4.8%	5.9%
2006	51,503	49,169	2,334	4.5%	5.4%
2007	51,901	49,281	2,620	5.0%	5.6%
2008	51,841	48,922	2,919	5.6%	6.5%
2009	52,940	49,183	3,757	7.1%	10.1%
2010	50,306	46,603	3,703	7.4%	10.0%
2011	50,487	47,220	3,267	6.5%	8.6%

D. HMDA DATA

The Home Mortgage Disclosure Act (HMDA) requires both depository and non-depository lenders to collect and publicly disclose information about housing-related loans and loan applications.⁸¹ The information presented in this section presents detailed HMDA data, including denial rates and predatory lending including high annual percentage rate (APR) loans.

Table 20.D.1
Purpose of Loan by Year
20. Geauga County
2004–2011 HMDA Data

Purpose	2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	2,490	2,796	2,488	1,953	1,338	1,231	1,209	1,263	14,768
Home Improvement	553	688	703	521	329	205	152	164	3,315
Refinancing	5,206	4,973	4,447	3,247	2,357	4,598	4,117	3,699	32,644
Total	8,249	8,457	7,638	5,721	4,024	6,034	5,478	5,126	50,727

Table 20.D.2
Occupancy Status for Home Purchase Loan Applications
20. Geauga County
2004–2011 HMDA Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	Total
Owner-Occupied	2,360	2,628	2,325	1,851	1,284	1,192	1,152	1,211	14,003
Not Owner-Occupied	117	162	159	98	52	38	57	51	734
Not Applicable	13	6	4	4	2	1	0	1	31
Total	2,490	2,796	2,488	1,953	1,338	1,231	1,209	1,263	14,768

Table 20.D.3
Owner-Occupied Home Purchase Loan Applications by Loan Type
20. Geauga County
2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Conventional	2,258	2,531	2,214	1,713	962	757	686	814	11,935
FHA - Insured	92	73	87	101	264	325	360	282	1,584
VA - Guaranteed	9	17	17	26	30	45	35	50	229
Rural Housing Service or Farm Service Agency	1	7	7	11	28	65	71	65	255
Total	2,360	2,628	2,325	1,851	1,284	1,192	1,152	1,211	14,003

⁸¹ Data are considered “raw” because they contain entry errors and incomplete loan applications. Starting in 2004, the HMDA data made substantive changes in reporting. It modified the way it handled Hispanic data, loan interest rates, and the reporting of multifamily loan applications.

DENIAL RATES

Table 20.D.4
Loan Applications by Action Taken
 20. Geauga County
 2004–2011 HMDA Data

Action	2004	2005	2006	2007	2008	2009	2010	2011	Total
Loan Originated	1,489	1,540	1,327	1,050	748	619	624	700	8,097
Application Approved but not Accepted	127	136	119	126	60	59	55	30	712
Application Denied	196	284	205	168	92	82	80	72	1,179
Application Withdrawn by Applicant	155	177	131	94	78	62	59	75	831
File Closed for Incompleteness	38	47	35	24	13	14	17	13	201
Loan Purchased by the Institution	355	443	508	389	293	356	317	321	2,982
Preapproval Request Denied	0	1	0	0	0	0	0	0	1
Preapproval Approved but not Accepted	0	0	0	0	0	0	0	0	0
Total	2,360	2,628	2,325	1,851	1,284	1,192	1,152	1,211	14,003
Denial Rate	11.6%	15.6%	13.4%	13.8%	11.0%	11.7%	11.4%	9.3%	12.7%

Table 20.D.5
Denial Rates by Gender of Applicant
 20. Geauga County
 2004–2011 HMDA Data

Year	Male	Female	Not Available	Not Applicable	Average
2004	10.5%	13.1%	35.0%	%	11.6%
2005	13.2%	15.4%	56.4%	.0%	15.6%
2006	11.7%	15.5%	35.8%	50.0%	13.4%
2007	12.9%	13.5%	27.3%	%	13.8%
2008	10.7%	13.1%	3.0%	.0%	11.0%
2009	12.1%	10.9%	9.5%	%	11.7%
2010	10.0%	13.4%	18.8%	%	11.4%
2011	8.9%	8.5%	18.6%	.0%	9.3%
Average	11.5%	13.5%	29.0%	16.7%	12.7%

Table 20.D.6
Loan Applications by Selected Action Taken by Gender of Applicant
 20. Geauga County
 2004–2011 HMDA Data

Gender		2004	2005	2006	2007	2008	2009	2010	2011	Total
Male	Originated	1,151	1,141	1,019	745	536	450	443	524	6,009
	Denied	135	174	135	110	64	62	49	51	780
	Denial Rate	10.5%	13.2%	11.7%	12.9%	10.7%	12.1%	10.0%	8.9%	11.5%
Female	Originated	312	363	273	257	179	131	142	140	1,797
	Denied	47	66	50	40	27	16	22	13	281
	Denial Rate	13.1%	15.4%	15.5%	13.5%	13.1%	10.9%	13.4%	8.5%	13.5%
Not Available	Originated	26	34	34	48	32	38	39	35	286
	Denied	14	44	19	18	1	4	9	8	117
	Denial Rate	35.0%	56.4%	35.8%	27.3%	3.0%	9.5%	18.8%	18.6%	29.0%
Not Applicable	Originated	0	2	1	0	1	0	0	1	5
	Denied	0	0	1	0	0	0	0	0	1
	Denial Rate	%	.0%	50.0%	%	.0%	%	%	.0%	16.7%
Total	Originated	1,489	1,540	1,327	1,050	748	619	624	700	8,097
	Denied	196	284	205	168	92	82	80	72	1,179
	Denial Rate	11.6%	15.6%	13.4%	13.8%	11.0%	11.7%	11.4%	9.3%	12.7%

Table 20.D.7
Denial Rates by Race/Ethnicity of Applicant
 20. Geauga County
 2004–2011 HMDA Data

Race/Ethnicity	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	.0%	20.0%	.0%	.0%	.0%	.0%	.0%	50.0%	6.9%
Asian	.0%	.0%	.0%	60.0%	10.0%	16.7%	.0%	.0%	8.8%
Black	25.0%	42.1%	52.9%	42.9%	38.5%	50.0%	33.3%	50.0%	41.7%
White	10.8%	12.6%	11.5%	11.8%	10.6%	11.4%	10.7%	8.5%	11.2%
Not Available	25.8%	37.2%	28.1%	27.8%	10.0%	12.3%	18.8%	16.9%	25.6%
Not Applicable	.0%	.0%	50.0%	%	.0%	0%	0%	.0%	10.0%
Average	11.6%	15.6%	13.4%	13.8%	11.0%	11.7%	11.4%	9.3%	12.7%
Non-Hispanic	10.7%	12.7%	12.2%	12.5%	11.0%	11.7%	10.5%	8.7%	11.5%
Hispanic	7.7%	36.0%	.0%	10.0%	16.7%	.0%	25.0%	.0%	16.1%

Table 20.D.8
Loan Applications by Selected Action Taken by Race/Ethnicity of Applicant
 20. Geauga County
 2004–2011 HMDA Data

Race		2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Originated	3	4	7	5	2	3	2	1	27
	Denied	0	1	0	0	0	0	0	1	2
	Denial Rate	.0%	20.0%	.0%	.0%	.0%	.0%	.0%	50.0%	6.9%
Asian	Originated	12	6	8	2	9	5	6	4	52
	Denied	0	0	0	3	1	1	0	0	5
	Denial Rate	.0%	.0%	.0%	60.0%	10.0%	16.7%	.0%	.0%	8.8%
Black	Originated	18	22	16	12	8	2	2	1	81
	Denied	6	16	18	9	5	2	1	1	58
	Denial Rate	25.0%	42.1%	52.9%	42.9%	38.5%	50.0%	33.3%	50.0%	41.7%
White	Originated	1,386	1,393	1,226	961	683	559	562	639	7,409
	Denied	167	200	159	129	81	72	67	59	934
	Denial Rate	10.8%	12.6%	11.5%	11.8%	10.6%	11.4%	10.7%	8.5%	11.2%
Not Available	Originated	66	113	69	70	45	50	52	54	519
	Denied	23	67	27	27	5	7	12	11	179
	Denial Rate	25.8%	37.2%	28.1%	27.8%	10.0%	12.3%	18.8%	16.9%	25.6%
Not Applicable	Originated	4	2	1	0	1	0	0	1	9
	Denied	0	0	1	0	0	0	0	0	1
	Denial Rate	25.8%	37.2%	28.1%	27.8%	10.0%	12.3%	18.8%	16.9%	10.0%
Total	Originated	1,489	1,540	1,327	1,050	748	619	624	700	8,097
	Denied	196	284	205	168	92	82	80	72	1,179
	Denial Rate	11.6%	15.6%	13.4%	13.8%	11.0%	11.7%	11.4%	9.3%	12.7%
Non-Hispanic	Originated	1,292	1,411	1,247	966	691	565	569	639	7,380
	Denied	155	206	174	138	85	75	67	61	961
	Denial Rate	10.7%	12.7%	12.2%	12.5%	11.0%	11.7%	10.5%	8.7%	11.5%
Hispanic	Originated	12	16	11	9	10	6	3	6	73
	Denied	1	9	0	1	2	0	1	0	14
	Denial Rate	7.7%	36.0%	.0%	10.0%	16.7%	.0%	25.0%	.0%	16.1%

Table 20.D.9
Loan Applications by Reason for Denial
 20. Geauga County
 2004–2011 HMDA Data

Denial Reason	2004	2005	2006	2007	2008	2009	2010	2011	Total
Debt-to-Income Ratio	33	40	19	22	21	17	24	16	192
Employment History	1	5	4	3	3	1	1	0	18
Credit History	40	63	36	26	12	9	8	16	210
Collateral	23	28	23	19	19	22	21	14	169
Insufficient Cash	5	6	7	6	1	1	0	1	27
Unverifiable Information	4	10	12	5	3	1	6	1	42
Credit Application Incomplete	21	19	15	22	7	10	6	8	108
Mortgage Insurance Denied	0	0	0	0	0	0	0	0	0
Other	27	47	39	19	9	6	9	5	161
Missing	42	66	50	46	17	15	5	11	252
Total	196	284	205	168	92	82	80	72	1,179

Table 20.D.10
Denial Rates by Income of Applicant
 20. Geauga County
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	44.4%	44.4%	57.1%	100.0%	66.7%	40.0%	100.0%	100.0%	52.8%
\$15,001–\$30,000	28.7%	45.3%	24.4%	33.3%	30.2%	33.3%	15.7%	24.3%	30.5%
\$30,001–\$45,000	12.9%	28.4%	15.1%	21.8%	17.8%	12.6%	17.3%	8.4%	18.0%
\$45,001–\$60,000	13.5%	16.5%	18.3%	16.3%	13.4%	10.1%	13.2%	10.7%	14.6%
\$60,001–\$75,000	6.6%	14.4%	13.8%	11.0%	3.5%	9.9%	5.0%	11.4%	10.2%
Above \$75,000	9.4%	8.1%	10.3%	9.7%	8.0%	9.7%	9.1%	7.2%	9.0%
Data Missing	10.6%	15.4%	15.0%	11.5%	.0%	50.0%	27.3%	33.3%	13.9%
Total	11.6%	15.6%	13.4%	13.8%	11.0%	11.7%	11.4%	9.3%	12.7%

Table 20.D.11
Denial Rates of Loans by Race/Ethnicity and Income of Applicant
 20. Geauga County
 2004–2011 HMDA Data

Race	<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	Above \$75K	Data Missing	Average
American Indian	%	33.3%	14.3%	.0%	.0%	.0%	%	6.9%
Asian	%	.0%	16.7%	11.1%	.0%	8.8%	.0%	8.8%
Black	40.0%	14.3%	63.6%	41.2%	17.6%	49.4%	.0%	41.7%
White	50.0%	27.4%	15.7%	13.2%	8.9%	8.0%	9.8%	11.2%
Not Available	100.0%	66.7%	41.1%	30.1%	27.3%	12.9%	54.2%	25.6%
Not Applicable	%	%	%	%	%	.0%	33.3%	10.0%
Average	52.8%	30.5%	18.0%	14.6%	10.2%	9.0%	13.9%	12.7%
Non-Hispanic Ethnicity	50.0%	26.8%	15.7%	13.3%	8.9%	8.6%	10.1%	11.5%
Hispanic (Ethnicity)	%	42.9%	38.5%	9.1%	.0%	8.9%	25.0%	16.1%

Table 20.D.12
Loan Applications by Reason for Denial by Race/Ethnicity of Applicant

20. Geauga County
 2004–2011 HMDA Data

Denial Reason	American Indian	Asian	Black	White	Not Available	Not Applicable	Total	Hispanic (Ethnicity)
Debt-to-Income Ratio	0	1	7	159	25	0	192	1
Employment History	0	0	2	16	0	0	18	0
Credit History	1	0	7	163	39	0	210	2
Collateral	0	2	7	138	22	0	169	0
Insufficient Cash	0	0	0	21	6	0	27	0
Unverifiable Information	1	0	6	29	6	0	42	0
Credit Application Incomplete	0	0	2	86	20	0	108	1
Mortgage Insurance Denied	0	0	0	0	0	0	0	0
Other	0	0	6	132	23	0	161	3
Missing	0	2	21	190	38	1	252	7
Total	2	5	58	934	179	1	1,179	14
% Missing	.0%	40.0%	36.2%	20.3%	21.2%	100.0%	21.4%	50.0%

Table 20.D.13
Loan Applications by Income of Applicant: Originated and Denied

20. Geauga County
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Loan Originated	5	5	3	0	1	3	0	0	17
	Application Denied	4	4	4	1	2	2	1	1	19
	Denial Rate	44.4%	44.4%	57.1%	100.0%	66.7%	40.0%	100.0%	100.0%	52.8%
\$15,001–\$30,000	Loan Originated	72	52	59	40	30	22	43	28	346
	Application Denied	29	43	19	20	13	11	8	9	152
	Denial Rate	28.7%	45.3%	24.4%	33.3%	30.2%	33.3%	15.7%	24.3%	30.5%
\$30,001–\$45,000	Loan Originated	222	187	135	133	106	104	86	87	1,060
	Application Denied	33	74	24	37	23	15	18	8	232
	Denial Rate	12.9%	28.4%	15.1%	21.8%	17.8%	12.6%	17.3%	8.4%	18.0%
\$45,001–\$60,000	Loan Originated	243	237	152	154	103	107	92	92	1,180
	Application Denied	38	47	34	30	16	12	14	11	202
	Denial Rate	13.5%	16.5%	18.3%	16.3%	13.4%	10.1%	13.2%	10.7%	14.6%
\$60,001–\$75,000	Loan Originated	214	225	163	130	110	64	76	78	1,060
	Application Denied	15	38	26	16	4	7	4	10	120
	Denial Rate	6.6%	14.4%	13.8%	11.0%	3.5%	9.9%	5.0%	11.4%	10.2%
Above \$75,000	Loan Originated	657	790	747	570	390	318	319	413	4,204
	Application Denied	68	70	86	61	34	34	32	32	417
	Denial Rate	9.4%	8.1%	10.3%	9.7%	8.0%	9.7%	9.1%	7.2%	9.0%
Data Missing	Loan Originated	76	44	68	23	8	1	8	2	230
	Application Denied	9	8	12	3	0	1	3	1	37
	Denial Rate	10.6%	15.4%	15.0%	11.5%	.0%	50.0%	27.3%	33.3%	13.9%
Total	Loan Originated	1,489	1,540	1,327	1,050	748	619	624	700	8,097
	Application Denied	196	284	205	168	92	82	80	72	1,179
	Denial Rate	11.6%	15.6%	13.4%	13.8%	11.0%	11.7%	11.4%	9.3%	12.7%

Table 20.D.14
Loan Applications by Income and Race/Ethnicity of Applicant: Originated and Denied
 20. Geauga County
 2004–2011 HMDA Data

Race		<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	> \$75K	Data Missing	Total
American Indian	Loan Originated	0	2	6	2	4	13	0	27
	Application Denied	0	1	1	0	0	0	0	2
	Denial Rate	%	33.3%	14.3%	.0%	.0%	.0%	%	6.9%
Asian	Loan Originated	0	1	5	8	6	31	1	52
	Application Denied	0	0	1	1	0	3	0	5
	Denial Rate	%	.0%	16.7%	11.1%	.0%	8.8%	.0%	8.8%
Black	Loan Originated	3	6	4	10	14	39	5	81
	Application Denied	2	1	7	7	3	38	0	58
	Denial Rate	40.0%	14.3%	63.6%	41.2%	17.6%	49.4%	.0%	41.7%
White	Loan Originated	14	323	989	1,095	980	3,797	211	7,409
	Application Denied	14	122	184	166	96	329	23	934
	Denial Rate	50.0%	27.4%	15.7%	13.2%	8.9%	8.0%	9.8%	11.2%
Not Available	Loan Originated	0	14	56	65	56	317	11	519
	Application Denied	3	28	39	28	21	47	13	179
	Denial Rate	100.0%	66.7%	41.1%	30.1%	27.3%	12.9%	54.2%	25.6%
Not Applicable	Loan Originated	0	0	0	0	0	7	2	9
	Application Denied	0	0	0	0	0	0	1	1
	Denial Rate	%	%	%	%	%	.0%	33.3%	10.0%
Total	Loan Originated	17	346	1,060	1,180	1,060	4,204	230	8,097
	Application Denied	19	152	232	202	120	417	37	1,179
	Denial Rate	52.8%	30.5%	18.0%	14.6%	10.2%	9.0%	13.9%	12.7%
Non-Hispanic Ethnicity	Loan Originated	17	323	990	1,084	981	3,781	204	7,380
	Application Denied	17	118	185	167	96	355	23	961
	Denial Rate	50.0%	26.8%	15.7%	13.3%	8.9%	8.6%	10.1%	11.5%
Hispanic (Ethnicity)	Loan Originated	0	4	8	10	7	41	3	73
	Application Denied	0	3	5	1	0	4	1	14
	Denial Rate	%	42.9%	38.5%	9.1%	.0%	8.9%	25.0%	16.1%

PREDATORY LENDING

Table 20.D.15
Originated Owner-Occupied Loans by HAL Status
 20. Geauga County
 2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Other	1,401	1,310	1,183	965	689	575	621	695	7,439
HAL	88	230	144	85	59	44	3	5	658
Total	1,489	1,540	1,327	1,050	748	619	624	700	8,097
Percent HAL	5.9%	14.9%	10.9%	8.1%	7.9%	7.1%	.5%	.7%	8.1%

Table 20.D.16
Loans by Loan Purpose by HAL Status
 20. Geauga County
 2004–2011 HMDA Data

Loan Purpose		2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	Other	1,401	1,310	1,183	965	689	575	621	695	7,439
	HAL	88	230	144	85	59	44	3	5	658
	Percent HAL	5.9%	14.9%	10.9%	8.1%	7.9%	7.1%	.5%	.7%	8.1%
Home Improvement	Other	241	271	319	198	128	58	66	66	1,347
	HAL	36	52	46	32	20	11	1	3	201
	Percent HAL	13.0%	16.1%	12.6%	13.9%	13.5%	15.9%	1.5%	4.3%	13.0%
Refinancing	Other	2,135	1,601	1,362	1,105	897	2,240	2,072	1,859	13,271
	HAL	222	366	335	161	65	114	13	4	1,280
	Percent HAL	9.4%	18.6%	19.7%	12.7%	6.8%	4.8%	.6%	.2%	8.8%
Total	Other	3,777	3,182	2,864	2,268	1,714	2,873	2,759	2,620	22,057
	HAL	346	648	525	278	59	44	3	5	2,139
	Percent HAL	8.4%	16.9%	15.5%	10.9%	7.8%	5.6%	.6%	.5%	8.8%

Table 20.D.17
HALs Originated by Race of Borrower
 20. Geauga County
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	0	2	0	1	1	0	0	0	4
Asian	2	2	1	0	1	0	0	0	6
Black	6	9	9	4	3	1	0	0	32
White	69	178	117	76	50	41	3	5	539
Not Available	11	39	17	4	4	2	0	0	77
Not Applicable	0	0	0	0	0	0	0	0	0
Total	88	230	144	85	59	44	3	5	658
Hispanic (Ethnicity)	1	4	2	3	0	1	0	0	11

Table 20.D.18
Rate of HALs Originated by Race/Ethnicity of Borrower
 20. Geauga County
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	.0%	50.0%	.0%	20.0%	50.0%	.0%	.0%	.0%	14.8%
Asian	16.7%	33.3%	12.5%	.0%	11.1%	.0%	.0%	.0%	11.5%
Black	33.3%	40.9%	56.3%	33.3%	37.5%	50.0%	.0%	.0%	39.5%
White	5.0%	12.8%	9.5%	7.9%	7.3%	7.3%	.5%	.8%	7.3%
Not Available	16.7%	34.5%	24.6%	5.7%	8.9%	4.0%	.0%	.0%	14.8%
Not Applicable	.0%	.0%	.0%	%	.0%	%	%	.0%	0%
Average	5.9%	14.9%	10.9%	8.1%	7.9%	7.1%	0.5%	0.7%	8.1%
Non-Hispanic Ethnicity	5.4%	13.2%	9.9%	8.2%	8.0%	7.1%	.5%	.8%	7.6%
Hispanic (Ethnicity)	8.3%	25.0%	18.2%	33.3%	.0%	16.7%	.0%	.0%	15.1%

Table 20.D.19
Loans by HAL Status by Race/Ethnicity of Borrower
 20. Geauga County
 2004–2011 HMDA Data

Race	Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Other	3	2	7	4	1	3	2	1	23
	HAL	0	2	0	1	1	0	0	0	4
	Percent HAL	.0%	50.0%	.0%	20.0%	50.0%	.0%	.0%	.0%	14.8%
Asian	Other	10	4	7	2	8	5	6	4	46
	HAL	2	2	1	0	1	0	0	0	6
	Percent HAL	16.7%	33.3%	12.5%	.0%	11.1%	.0%	.0%	.0%	11.5%
Black	Other	12	13	7	8	5	1	2	1	49
	HAL	6	9	9	4	3	1	0	0	32
	Percent HAL	33.3%	40.9%	56.3%	33.3%	37.5%	50.0%	.0%	.0%	39.5%
White	Other	1,317	1,215	1,109	885	633	518	559	634	6,870
	HAL	69	178	117	76	50	41	3	5	539
	Percent HAL	5.0%	12.8%	9.5%	7.9%	7.3%	7.3%	0.5%	0.8%	7.3%
Not Available	Other	55	74	52	66	41	48	52	54	442
	HAL	11	39	17	4	4	2	0	0	77
	Percent HAL	16.7%	34.5%	24.6%	5.7%	8.9%	4.0%	.0%	.0%	14.8%
Not Applicable	Other	4	2	1	0	1	0	0	0	9
	HAL	0	0	0	0	0	0	0	0	0
	Percent HAL	.0%	.0%	.0%	%	.0%	%	%	.0%	0.0%
Total	Other	1,401	1,310	1,183	965	689	575	621	695	7,439
	HAL	88	230	144	85	59	44	3	5	658
	Percent HAL	5.9%	14.9%	10.9%	8.1%	7.9%	7.1%	.5%	.7%	8.1%
Non-Hispanic Ethnicity	Other	1,222	1,225	1,124	887	636	525	566	634	6,819
	HAL	70	186	123	79	55	40	3	5	561
	Percent HAL	5.4%	13.2%	9.9%	8.2%	8.0%	7.1%	.5%	.8%	7.6%
Hispanic (Ethnicity)	Other	11	12	9	6	10	5	3	6	62
	HAL	1	4	2	3	0	1	0	0	11
	Percent HAL	8.3%	25.0%	18.2%	33.3%	.0%	16.7%	.0%	.0%	15.1%

Table 20.D.20
Rates of HALs by Income of Borrower
 20. Geauga County
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Average
\$15,000 or Below	20.0%	20.0%	33.3%	%	.0%	.0%	%	%	17.6%
\$15,001–\$30,000	18.1%	21.2%	5.1%	17.5%	20.0%	27.3%	2.3%	.0%	13.6%
\$30,001–\$45,000	13.5%	16.6%	10.4%	11.3%	10.4%	9.6%	1.2%	.0%	10.6%
\$45,001–\$60,000	4.1%	20.3%	9.9%	11.0%	12.6%	10.3%	.0%	1.1%	9.7%
\$60,001–\$75,000	4.2%	22.7%	13.5%	6.9%	9.1%	4.7%	.0%	1.3%	9.9%
Above \$75,000	3.3%	10.3%	9.9%	6.0%	4.9%	4.4%	0.3%	.7%	5.9%
Data Missing	3.9%	15.9%	22.1%	13.0%	.0%	.0%	.0%	.0%	12.2%
Average	5.9%	14.9%	10.9%	8.1%	7.9%	7.1%	.5%	.7%	8.1%

Table 20.D.21
Loans by HAL Status by Income of Borrower
 20. Geauga County
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Other	4	4	2	0	1	3	0	0	14
	HAL	1	1	1	0	0	0	0	0	3
	Percent HAL	20.0%	20.0%	33.3%	%	.0%	.0%	%	%	17.6%
\$15,001–\$30,000	Other	59	41	56	33	24	16	42	28	299
	HAL	13	11	3	7	6	6	1	0	47
	Percent HAL	18.1%	21.2%	5.1%	17.5%	20.0%	27.3%	2.3%	.0%	13.6%
\$30,001–\$45,000	Other	192	156	121	118	95	94	85	87	948
	HAL	30	31	14	15	11	10	1	0	112
	Percent HAL	13.5%	16.6%	10.4%	11.3%	10.4%	9.6%	1.2%	.0%	10.6%
\$45,001 – \$60,000	Other	233	189	137	137	90	96	92	91	1,065
	HAL	10	48	15	17	13	11	0	1	115
	Percent HAL	4.1%	20.3%	9.9%	11.0%	12.6%	10.3%	.0%	1.1%	9.7%
\$60,001–\$75,000	Other	205	174	141	121	100	61	76	77	955
	HAL	9	51	22	9	10	3	0	1	105
	Percent HAL	4.2%	22.7%	13.5%	6.9%	9.1%	4.7%	.0%	1.3%	9.9%
Above \$75,000	Other	635	709	673	536	371	304	318	410	3,956
	HAL	22	81	74	34	19	14	1	3	248
	Percent HAL	3.3%	10.3%	9.9%	6.0%	4.9%	4.4%	.3%	.7%	5.9%
Data Missing	Other	73	37	53	20	8	1	8	2	202
	HAL	3	7	15	3	0	0	0	0	28
	Percent HAL	3.9%	15.9%	22.1%	13.0%	.0%	.0%	.0%	.0%	12.2%
Total	Other	1,401	1,310	1,183	965	689	575	621	695	7,439
	HAL	88	230	144	85	59	44	3	5	658
	Percent HAL	5.9%	14.9%	10.9%	8.1%	7.9%	7.1%	.5%	.7%	8.1%

E. CRA DATA

Additional data tables related to Community Reinvestment Act (CRA) data are presented in this section.

Table 20.E.1
Small Business Loans Originated: \$100,000 or Less by Tract MFI
 20. Geauga County
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000		73	636	960		1,669
2001		83	725	1,031		1,839
2002		227	991	1,378		2,596
2003			1,079	1,596		2,675
2004			1,238	1,561		2,799
2005			1,290	1,751		3,041
2006			1,589	2,765		4,354
2007			1,794	2,932		4,726
2008			1,319	2,349		3,668
2009			580	1,037		1,617
2010			543	955		1,498
2011			673	1,096		1,769
Total	0	383	12,457	19,411	0	32,251
Loan Amount (\$1,000s)						
2000		1,166	9,676	12,436		23,278
2001		829	8,862	11,784		21,475
2002		2,037	11,263	16,847		30,147
2003			11,933	17,104		29,037
2004			12,814	16,959		29,773
2005			15,905	20,006		35,911
2006			17,228	28,182		45,410
2007			19,054	30,483		49,537
2008			14,502	26,491		40,993
2009			7,855	12,197		20,052
2010			9,736	12,820		22,556
2011			10,688	16,363		27,051
Total	0	4,032	149,516	221,672	0	375,220

Table 20.E.2
Small Business Loans Originated: \$100,001 to \$250,000 by Tract MFI
 20. Geauga County
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000		3	35	39		77
2001		5	44	47		96
2002		6	37	52		95
2003			37	55		92
2004			46	57		103
2005			43	44		87
2006			46	45		91
2007			38	41		79
2008			28	35		63
2009			30	31		61
2010			34	37		71
2011			39	46		85
Total	0	14	457	529	0	1,000
Loan Amount (\$1,000s)						
2000		493	6,024	7,040		13,557
2001		935	7,705	8,262		16,902
2002		966	6,590	9,503		17,059
2003			6,811	10,094		16,905
2004			8,370	10,132		18,502
2005			7,492	8,244		15,736
2006			8,187	8,349		16,536
2007			7,341	7,253		14,594
2008			5,264	6,316		11,580
2009			5,618	5,100		10,718
2010			6,351	6,554		12,905
2011			7,098	8,126		15,224
Total	0	2,394	82,851	94,973	0	180,218

Table 20.E.3
Small Business Loans Originated: More than \$250,000 by Tract MFI
 20. Geauga County
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000		3	25	35		63
2001		4	32	54		90
2002		5	41	44		90
2003			44	51		95
2004			48	55		103
2005			48	43		91
2006			34	43		77
2007			39	50		89
2008			30	42		72
2009			30	29		59
2010			44	43		87
2011			33	39		72
Total	0	12	448	528	0	988
Loan Amount (\$1,000s)						
2000		1,740	12,856	16,744		31,340
2001		2,314	16,453	26,432		45,199
2002		2,625	21,243	22,750		46,618
2003			24,091	27,190		51,281
2004			25,525	28,051		53,576
2005			25,077	21,819		46,896
2006			17,856	22,382		40,238
2007			19,834	27,390		47,224
2008			16,024	21,435		37,459
2009			13,890	17,052		30,942
2010			21,611	21,529		43,140
2011			16,337	18,848		35,185
Total	0	6,679	230,797	271,622	0	509,098

Table 20.E.4
Small Business Loans to Businesses with Gross Annual Revenues of Less Than \$1 Million by Tract MFI
 20. Geauga County
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000		32	293	412		737
2001		36	324	496		856
2002		60	304	409		773
2003			429	578		1,007
2004			459	601		1,060
2005			663	799		1,462
2006			612	925		1,537
2007			634	965		1,599
2008			457	681		1,138
2009			243	335		578
2010			223	313		536
2011			343	510		853
Total	0	128	4,984	7,024	0	12,136
Loan Amount (\$1,000s)						
2000		1,294	14,179	18,000		33,473
2001		1,383	14,104	24,222		39,709
2002		3,667	17,758	19,859		41,284
2003			15,561	24,015		39,576
2004			17,599	24,766		42,365
2005			19,686	17,599		37,285
2006			14,576	22,191		36,767
2007			15,942	26,034		41,976
2008			13,370	14,981		28,351
2009			9,085	10,422		19,507
2010			10,306	15,615		25,921
2011			10,916	14,496		25,412
Total	0	6,344	173,082	232,200	0	411,626

F. COMPLAINT DATA

This section contains data regarding fair housing complaints, as provided by the U.S. Department of Housing and Urban Development (HUD), the Ohio Civil Rights Commission (OCRC), and the Fair Housing Resource Center (FHRC).

HUD COMPLAINTS

Table 20.F.1
Fair Housing Complaints by Basis
20. Geauga County
2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color										
Disability			1		14	1	1	2		19
Family Status					1	1	2			4
National Origin										
Race		1	1		1		1			4
Religion										
Sex						1	1			2
Total Bases		1	2		16	3	5	2		29
Total Complaints	1	1	2	1	16	3	5	2		31

Table 20.F.2
Fair Housing Complaints by Issue
20. Geauga County
2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Failure to make reasonable accommodation			1	1	2	1		1		6
Discrimination in terms, conditions or privileges relating to rental		1	1		1			1		4
Discriminatory refusal to rent	1					1	1			3
Discriminatory advertising, statements, and notices					2		1			3
Discriminatory advertisement - rental					1	1	1			3
Discriminatory acts under Section 818 (coercion, etc.)						1	1			2
Using ordinances to discriminate in zoning and land use					11					11
Discriminatory refusal to sell							1			1
Discriminatory refusal to negotiate for rental					1					1
Discriminatory terms, conditions, privileges, or services and facilities					1					1
Discrimination in terms, conditions, privileges relating to sale							1			1
Discrimination in services and facilities relating to rental				1						1
Failure to provide an accessible building entrance							1			1
Total Issues	1	1	2	2	19	4	7	2	0	38
Total Complaints	1	1	2	1	16	3	5	2		31

Table 20.F.3
Fair Housing Complaints by Closure Status
 20. Geauga County
 2004–2012 HUD Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Administrative Closure Cause (FHAP)			1		7		1			9
Conciliated / Settled	1		1	1	2	1	1	2		6
DOJ Closure					4					4
No Cause		1			1	1	3			6
Total Complaints	1	1	2	1	16	3	5	2		31

HUD Complaints Found With Cause

Table 20.F.4
Fair Housing Complaints Found With Cause by Basis
 20. Geauga County
 2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability					7	1		2		10
Family Status					1	1	1			3
Race			1							1
Total Bases			1		8	2	1	2		14
Total Complaints	1		1	1	8	2	1	2		16

Table 20.F.5
Fair Housing Complaints Found With Cause by Issue
 20. Geauga County
 2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Failure to make reasonable accommodation					1	2	1		1	5
Using ordinances to discriminate in zoning and land use						4				4
Discriminatory advertising, statements, and notices						2		1		3
Discrimination in terms, conditions or privileges relating to rental					1	1			1	3
Discriminatory refusal to rent		1						1		2
Discriminatory advertisement - rental						1	1			2
Discriminatory refusal to negotiate for rental						1				1
Discrimination in services and facilities relating to rental					1					1
Total Issues	1	0	1	2	11	3	1	2	0	21
Total Complaints	1		1	1	8	2	1	2		16

OHIO CIVIL RIGHTS COMMISSION COMPLAINTS

Table 20.F.6
Fair Housing Complaints by Basis
 20. Geauga County
 2004–2012 OCRC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability	1	2	1	1	5	3	1			14
Family Status					2	1	1			4
Gender	2		1			1	2			6
Race			1	1		1	1			4
Religion	1									1
Retaliation	3		1	1		1	1			7
Total Bases	7	2	4	3	8	6	6	0	0	36
Total Complaints	4	2	2	2	8	5	5			28

Table 20.F.7
Fair Housing Complaints by Issue
 20. Geauga County
 2004–2012 OCRC Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Advertising	1				1					2
Exclusion		1			3	1	2			7
Harassment	1			1		2				4
Intimidation	1					1				2
Other	1	2	1		1	2	2			9
Reasonable Accommodation				1	4	1				6
Terms and Conditions	2		1		2	2	1			8
Total Issues	6	3	2	2	11	9	5	0	0	38
Total Complaints	4	2	2	2	8	5	5			28

Table 20.F.8
Fair Housing Complaints by Closure Status
 20. Geauga County
 2004–2012 OCRC Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
CP Failed to Cooperate	1						1			2
CP Withdrawal – No Benefit	2		1		1					4
No Cause Finding Issued	1				1	1	2			5
Open Charge Closed By Legal Activity		2								2
Settlement With Benefits			1		1	3	1			6
Successful Conciliation				1	3	1	1			6
Withdrawal With Benefits				1	2					3
Total Complaints	4	2	2	2	8	5	5	0	0	28

FAIR HOUSING RESOURCE CENTER COMPLAINTS

Table 20.F.11
Fair Housing Complaints by Basis
20. Geauga County
2004– 2012 FHRC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability			2					1		3
Family Status			1	1						2
Total Bases	0	0	3	1	0	0	0	1	0	5
Total Complaints			3	1				1		5

Table 20.F.12
Fair Housing Complaints by Issue Type
20. Geauga County
2004– 2012 FHRC Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Rental			3	1				1		5
Total	0	0	3	1	0	0	0	1	0	5

Table 20.F.13
Fair Housing Complaints by Closure Status
20. Geauga County
2004– 2012 FHRC Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Settled through counseling			3	1				1		5
Complaint filed in federal court										6
Total	0	0	3	1	0	0	0	1	0	5

G. FAIR HOUSING SURVEY FOR HOUSING STAKEHOLDERS DATA

This section presents public involvement data gathered through the 2012–2013 Fair Housing Survey for Housing Stakeholders.

Table 20.G.1
Primary Role of Respondent
20. Geauga County
2012–2013 Fair Housing Survey for Housing
Stakeholders Data

Primary Role	Total
Advocate/Service Provider	1
Local Government	1
Real Estate	1
Other Role	1
Total	4

FEDERAL, STATE, AND LOCAL LAWS

Table 20.G.2
Familiarity with Fair Housing Laws

20. Geauga County
2012–2013 Fair Housing Survey
for Housing Stakeholders Data

Familiarity	Total
Not Familiar	0
Somewhat Familiar	0
Very Familiar	2
Missing	2
Total	4

Table 20.G.3
Perceptions About Fair Housing Laws

20. Geauga County
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?	1	1		2	4
Are fair housing laws difficult to understand or follow?		2		2	4
Do you think fair housing laws should be changed?	1		1	2	4
Do you think fair housing laws are adequately enforced?	1		1	2	4

Table 20.G.4
Fair Housing Activities

20. Geauga County
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?	1		1	2	4	
Have you participated in fair housing training?	1			3	4	
Are you aware of any fair housing testing?	1		1	2	4	
Testing and education	Too Little	Right Amount	Too Much	Don't Know	Missing	Total
Is there sufficient outreach and education activity?	1			1	2	4
Is there sufficient testing?	1			1	2	4

Table 20.G.5
Protected Classes

20. Geauga County
2012–2013 Fair Housing Survey
for Housing Stakeholders Data

Protected Class	Total
Gender	1
National Origin	1
Color	1
Military	1
Ancestry	1
Other	2
Total	7

Table 20.G.6
Fair Housing Violation
Referrals

20. Geauga County
 2012–2013 Fair Housing Survey
 for Housing Stakeholders Data

Referral	Total
HUD	1
OCRC	1
Total	2

LOCAL FAIR HOUSING

Table 20.G.7

Local Fair Housing

20. Geauga County
 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?		1	1	2	4
Are there any specific geographic areas that have fair housing problems?			2	2	4
Are there any specific groups in that face housing discrimination?	1		1	2	4

FAIR HOUSING IN THE PRIVATE SECTOR

Table 20.G.8

Barriers to Fair Housing in the Private Sector

20. Geauga County
 2012–2013 Fair Housing Survey for Housing Stakeholders Data

Question	Yes	No	Don't Know	Missing	Total
Are you aware of any questionable practices or barriers to fair housing choice in:					
The rental housing market?	1		1	2	4
The real estate industry?		1	1	2	4
The mortgage and home lending industry?	1		1	2	4
The housing construction or accessible housing design fields?			2	2	4
The home insurance industry?			2	2	4
The home appraisal industry?	1		1	2	4
Any other housing services?	1		1	2	4

FAIR HOUSING IN THE PUBLIC SECTOR

Table 20.G.9
Barriers to Fair Housing in the Public Sector
 20. Geauga County
 2012–2013 Fair Housing Survey for Housing Stakeholders Data

Question	Yes	No	Don't Know	Missing	Total
Are you aware of any questionable practices or barriers to fair housing choice in:					
Land use policies?	1		1	2	4
Zoning laws?		1	1	2	4
Occupancy standards or health and safety codes?	1		1	2	4
Property tax policies?			2	2	4
Permitting process?			2	2	4
Housing construction standards?			2	2	4
Neighborhood or community development policies?			2	2	4
Limited access to government services, such as employment services?	1		1	2	4
Public administrative actions or regulations?	1		1	2	4

NARRATIVE COMMENTS

Federal, State, and Local Laws

Table 20.G.10
How did you become aware of fair housing laws?
 20. Geauga County
 2013 Fair Housing Survey Data

Comments:
I am an approved Continuing Education provider and Instructor for the Division of Real Estate and regularly teach Fair Housing to real estate licensees.

Table 20.G.11
How should fair housing laws be changed?
 20. Geauga County
 2013 Fair Housing Survey Data

Comments:
Federal and/or Ohio Law should include sexual orientation.

Local Fair Housing

Table 20.G.12
Are there any specific groups in that face housing discrimination?
 20. Geauga County
 2013 Fair Housing Survey Data

Comments:
Elderly/disabled; families with children in need of rentals.

Fair Housing in the Private Sector

Table 20.G.13
Are you aware of any questionable practices or barriers to fair housing choice in the rental housing market?
 20. Geauga County
 2013 Fair Housing Survey Data

Comments:
Making reasonable accommodations; families with children; therapy animals. Many non-traditional landlords (people who couldn't sell their homes) do not understand Fair Housing.

Table 20.G.14**Are you aware of any questionable practices or barriers to fair housing choice in the real estate industry?**

20. Geauga County
2013 Fair Housing Survey Data

Comments:
The industry is pretty well trained and the consequences for violation are well known.

Table 20.G.15**Are you aware of any questionable practices or barriers to fair housing choice in the mortgage and home lending industry?**

20. Geauga County
2013 Fair Housing Survey Data

Comments:
A neighbor of mine was turned down for a refinance mortgage when her lender refused to consider her disability income.

Table 20.G.16**Are you aware of any questionable practices or barriers to fair housing choice in the home appraisal industry?**

20. Geauga County
2013 Fair Housing Survey Data

Comments:
Appraisers often use language in describing neighborhoods and properties that violate Fair Housing requirements.

Table 20.G.17**Are you aware of any questionable practices or barriers to fair housing choice in any other housing services?**

20. Geauga County
2013 Fair Housing Survey Data

Comments:
In Cleveland, a family member who is White has found it difficult to foreclosure prevention assistance. One person she talked to told her their service was only for Black people.

Fair Housing in the Public Sector**Table 20.G.18****Are you aware of any questionable practices or barriers to fair housing choice in land use policies?**

20. Geauga County
2013 Fair Housing Survey Data

Comments:
It is more economic but large lot zoning excludes many from living here, although not specifically for Fair Housing

Table 20.G.19**Are you aware of any barriers that limit access to government services, such as a lack of transportation or employment services?**

20. Geauga County
2013 Fair Housing Survey Data

Comments:
There is very limited public transportation (by appointment only). Many officials are parttime and not available to residents at times residents can see them.

Table 20.G.20

Are you aware of any questionable practices or barriers to fair housing choice in any other public administrative actions or regulations?

20. Geauga County
2013 Fair Housing Survey Data

Comments:
Definition of family, large lot zoning.

H. LAND USE PLANNING SURVEY DATA

This section contains data regarding the potential effects of local land use and housing policies on fair housing choice, as gathered from the Fair Housing Survey for Government Officials.

FAIR HOUSING SURVEY FOR GOVERNMENT OFFICIALS

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 was conducted predominately online. Respondents were solicited by mass-distributed emails sent by the NEOSCC, members of the Progress Review Team, and other various organizations in the 12-county region.

This section contains data gathered from the public sector staff in the Geauga County that received and completed the survey.⁸²

⁸² For areas with both nonentitlement and entitlement communities, the results of the nonentitlement community government official survey and the entitlement community interviews were summed.

Table 20.H.1
Housing Development
 20. Geauga County
 2012 Fair Housing Survey for Government Officials Data

Question: Does your jurisdiction have...	Yes	No	Don't Know	Missing	Total
Housing Development					
Definitions for "dwelling unit" or "residential unit"?	2	0	1	2	5
Guidelines that encourage development affordable housing units?	0	0	3	2	5
Any potential barriers to the development of low- to moderate- income housing?	0	1	2	2	5
Guidelines that allow the development of mixed use housing?	0	1	2	2	5
Any potential barriers to the development of mixed use housing?	1	0	2	2	5
Occupancy Standards					
A definition for the term "family"?	1	0	2	2	5
Residential occupancy standards or limits?	0	0	3	2	5
Special Needs Housing					
A definition for the term "disability"?	0	1	2	2	5
Development standards for making housing accessible to persons with disabilities?	0	1	2	2	5
A process by which persons with disabilities can request modification to the jurisdiction's policies?	0	0	3	2	5
Standards for the development of senior housing?	0	0	3	2	5
Guidelines that distinguish senior citizen housing from other residential uses?	0	1	2	2	5
Guidelines for developing housing for any other special needs populations?	0	1	2	2	5
Fair Housing Policies					
A fair housing ordinance, policy, or regulation?	0	0	3	2	5
Policies or practices for "affirmatively furthering fair housing"?	0	0	3	2	5

I. IMPEDIMENTS

The 2013 Northeast Ohio Regional Analysis of Impediments to Fair Housing Choice uncovered several potential issues regarding fair housing in the Geauga County. Identification of these items as probable impediments to fair housing choice was based on HUD's definition of impediments as actions, omissions, or decisions that restrict housing choice due to protected class status or actions, omissions, or decisions that have this effect. The identified impediments are supported by evidence uncovered during the Regional AI process, with impediments of higher need being those identified in multiple sources.

These probable impediments in the entirety of the Northeast Ohio Region are presented in **Volumes I and II** of the Regional AI. They are accompanied by suggested actions that jurisdictions in the Region may implement in order to alleviate or eliminate these impediments, and are accompanied by measurable objectives. The goal of these actions and measurable objectives is to assist these agencies in offering greater housing choice for all citizens of the Northeast Ohio Region.

The following list presents the private and public sector impediments found in the Geauga County.

PRIVATE SECTOR

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

The review of fair housing cases and results of the Fair Housing Survey both supported denial of available housing units in the rental market as an

impediment to fair housing choice in the Region. Denial of housing in the rental markets was found to be most frequently based on race, disability, and familial status.

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

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

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

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

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

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

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

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

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

Suggestion: Additional training for landlords and property managers.

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

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

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

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

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

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

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

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

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

8. *Impediment: Denial of home purchase loans*

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

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

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

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

Suggestion: Utilize resources for first-time and lower-income homebuyers that belong to race, ethnic, and gender protected classes so that they can improve their credit 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 throughout the County.

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. This was also true for Geauga County.

Suggestion: Construct a regional 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 in the County. 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 other local units of government as co-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:* 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 in Geauga County. 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.

IMPEDIMENTS MATRIX

The matrix on the following page includes the impediment, data source, or sources that indicated its existence, protected classes most affected, and ranking of need for action. Level of need for action was determined based on the number of data sources that identified each impediment.

Table 20.I.1
Impediments Matrix
 20. Geauga County
 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 ⁸³			
Private Sector													
1	Denial of available housing units in the rental markets		X				X	X				Black and Hispanic persons	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				Black and Hispanic persons	M
10	Failure to comply with accessibility requirements in construction of housing units							X				Disabled persons	L
Public Sector													
1	Lack of sufficient fair housing policies or practices by several units of local government							X				All	L
2	Lack of sufficient fair housing outreach and education efforts							X	X	X		All	H
3	Land use and planning decisions and operational practices resulting in unequal access to government services such as transportation							X		X		All	M
4	Lack of inclusionary policies							X		X		All	M

⁸³ 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.

21. LAKE COUNTY

A. CENSUS BUREAU DATA

This section contains additional data from the U.S. Census Bureau.

Table 21.A.1

Population by Age

21. Lake County

2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Under 5	13,906	6.1%	12,611	5.5%	-9.3%
5 to 19	46,254	20.3%	43,659	19.0%	-5.6%
20 to 24	11,460	5.0%	11,949	5.2%	4.3%
25 to 34	29,247	12.9%	25,816	11.2%	-11.7%
35 to 54	72,034	31.7%	67,558	29.4%	-6.2%
55 to 64	22,566	9.9%	31,483	13.7%	39.5%
65 or Older	32,044	14.1%	36,965	16.1%	15.4%
Total	227,511	100.0%	230,041	100.0%	1.1%

Table 21.A.2

Elderly Population by Age

21. Lake County

2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
65 to 66	3,428	10.7%	4,466	12.1%	30.3%
67 to 69	5,226	16.3%	6,714	18.2%	28.5%
70 to 74	8,370	26.1%	8,239	22.3%	-1.6%
75 to 79	7,173	22.4%	6,708	18.1%	-6.5%
80 to 84	4,503	14.1%	5,538	15.0%	23.0%
85 or Older	3,344	10.4%	5,300	14.3%	58.5%
Total	32,044	100.0%	36,965	100.0%	15.4%

Table 21.A.3

Population by Race and Ethnicity

21. Lake County

2000 & 2010 Census SF1 Data

Race	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
White	217,041	95.4%	212,713	92.5%	-2.0%
Black	4,527	2.0%	7,306	3.2%	61.4%
American Indian	251	.1%	273	.1%	8.8%
Asian	2,048	.9%	2,611	1.1%	27.5%
Native Hawaiian/ Pacific Islander	41	.0%	35	.0%	-14.6%
Other	1,505	.7%	3,577	1.6%	137.7%
Two or More Races	2,098	.9%	3,526	1.5%	68.1%
Total	227,511	100.0%	230,041	100.0%	1.1%
Non-Hispanic	223,632	98.3	222,216	96.6%	-.6%
Hispanic	3,879	1.7%	7,825	3.4%	101.7%

Table 21.A.4
Disability by Age
 21. Lake County
 2010 Three-Year ACS Data

Age	Male		Female		Total	
	Disabled Population	Disability Rate	Disabled Population	Disability Rate	Disabled Population	Disability Rate
Under 5	0	.0%	161	2.7%	161	1.3%
5 to 17	1,049	5.3%	628	3.3%	1,677	4.3%
18 to 34	1,432	6.6%	1,106	5.3%	2,538	5.9%
35 to 64	4,899	10.1%	5,434	10.7%	10,333	10.4%
65 to 74	1,613	18.8%	2,030	19.9%	3,643	19.4%
75 or Older	3,101	48.2%	4,622	45.4%	7,723	46.5%
Total	12,094	10.9%	13,981	11.9%	26,075	11.4%

Table 21.A.5
Employment Status by Disability and Type: Age 18 to 64
 21. Lake County
 2010 Three-Year ACS Data

Disability Status	Population
Employed:	109,615
With a disability:	5,477
With a hearing difficulty	1,698
With a vision difficulty	1,037
With a cognitive difficulty	1,558
With an ambulatory difficulty	2,217
With a self-care difficulty	370
With an independent living difficulty	789
No disability	104,138
Unemployed:	8,560
With a disability:	1,187
With a hearing difficulty	288
With a vision difficulty	97
With a cognitive difficulty	473
With an ambulatory difficulty	490
With a self-care difficulty	188
With an independent living difficulty	287
No disability	7,373
Not in labor force:	23,459
With a disability:	6,207
With a hearing difficulty	638
With a vision difficulty	701
With a cognitive difficulty	3,154
With an ambulatory difficulty	3,975
With a self-care difficulty	1,638
With an independent living difficulty	3,154
No disability	17,252
Total	141,634

Table 21.A.6
Households by Income

21. Lake County
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	8,542	9.5%	8,258	8.8%
\$15,000 to \$19,999	4,419	4.9%	4,134	4.4%
\$20,000 to \$24,999	5,433	6.1%	5,136	5.5%
\$25,000 to \$34,999	11,119	12.4%	10,398	11.0%
\$35,000 to \$49,999	16,482	18.4%	14,286	15.2%
\$50,000 to \$74,999	21,743	24.2%	20,410	21.7%
\$75,000 to \$99,999	11,670	13.0%	13,840	14.7%
\$100,000 or More	10,321	11.5%	17,749	18.8%
Total	89,729	100.0%	94,211	100.0%

Table 21.A.7
Poverty by Age

21. Lake County
2000 Census SF3 & 2010 Five-Year ACS Data

Age	2000 Census		2010 Five-Year ACS	
	Persons in Poverty	% of Total	Persons in Poverty	% of Total
Under 6	1,458	12.8%	2,631	14.4%
6 to 17	2,223	19.5%	4,024	22.0%
18 to 64	6,040	53.1%	10,089	55.2%
65 or Older	1,651	14.5%	1,518	8.3%
Total	11,372	100.0%	18,262	100.0%
Poverty Rate	5.1%	.	8.1%	.

Table 21.A.8
Households by Year Home Built

21. Lake County
2000 Census SF3 & 2010 Five-Year ACS Data

Year Built	2000 Census		2010 Five-Year ACS	
	Households	% of Total	Households	% of Total
1939 or Earlier	9,930	11.1%	9,900	10.5%
1940 to 1949	6,339	7.1%	6,438	6.8%
1950 to 1959	19,405	21.6%	19,022	20.2%
1960 to 1969	15,296	17.1%	14,353	15.2%
1970 to 1979	16,837	18.8%	16,569	17.6%
1980 to 1989	10,050	11.2%	9,399	10.0%
1990 to 1999	11,843	13.2%	11,512	12.2%
2000 to 2004	.	.	4,628	4.9%
2005 or Later	.	.	2,390	2.5%
Total	89,700	100.0%	94,211	100.0%

Table 21.A.9
Housing Units by Type

21. Lake County
2000 Census SF3 & 2010 Five-Year ACS Data

Unit Type	2000 Census		2010 Five-Year ACS	
	Units	% of Total	Units	% of Total
Single-Family	73,943	79.1%	79,708	79.4%
Duplex	1,573	1.7%	1,528	1.5%
Tri- or Four-Plex	2,194	2.3%	2,538	2.5%
Apartment	13,439	14.4%	14,233	14.2%
Mobile Home	2,329	2.5%	2,339	2.3%
Boat, RV, Van, Etc.	9	.0%	0	.0%
Total	93,487	100.0%	100,346	100.0%

Table 21.A.10
Housing Units by Tenure

21. Lake County
2000 & 2010 Census SF1 Data

Tenure	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
Occupied Housing Units	89,700	95.9%	94,156	93.0%	5.0%
Owner-Occupied	69,521	77.5%	71,335	75.8%	2.6%
Renter-Occupied	20,179	22.5%	22,821	24.2%	13.1%
Vacant Housing Units	3,787	4.1%	7,046	7.0%	86.1%
Total Housing Units	93,487	100.0%	101,202	100.0%	8.3%

Table 21.A.11
Disposition of Vacant Housing Units

21. Lake County
2000 & 2010 Census SF1 Data

Disposition	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
For Rent	1,319	34.8%	2,501	35.5%	89.6%
For Sale	802	21.2%	1,490	21.1%	85.8%
Rented or Sold, Not Occupied	393	10.4%	424	6.0%	7.9%
For Seasonal, Recreational, or Occasional Use	519	13.7%	759	10.8%	46.2%
For Migrant Workers	6	0.2%	5	.1%	-16.7%
Other Vacant	748	19.8%	1,867	26.5%	149.6%
Total	3,787	100.0%	7,046	100.0%	86.1%

Table 21.A.12
Households by Household Size

21. Lake County
2000 & 2010 Census SF1 Data

Size	2000 Census		2010 Census		% Change 00-10
	Households	% of Total	Households	% of Total	
One Person	22,956	25.6%	26,668	28.3%	16.2%
Two Persons	31,018	34.6%	33,126	35.2%	6.8%
Three Persons	14,835	16.5%	14,823	15.7%	-.1%
Four Persons	13,005	14.5%	11,927	12.7%	-8.3%
Five Persons	5,589	6.2%	5,017	5.3%	-10.2%
Six Persons	1,548	1.7%	1,740	1.8%	12.4%
Seven Persons or More	749	.8%	855	.9%	14.2%
Total	89,700	100.0%	94,156	100.0%	5.0%

Table 21.A.13
Household Type by Tenure
 21. Lake County
 2000 & 2010 Census SF1 Data

Household Type	2000 Census		2010 Census		% Change 00–10
	Households	% of Total	Households	% of Total	
Family Households	62,564	69.7%	62,384	66.3%	-.3%
Married-Couple Family	50,292	80.4%	47,573	76.3%	-5.4%
Owner-Occupied	44,979	89.4%	42,513	89.4%	-5.5%
Renter-Occupied	5,313	10.6%	5,060	10.6%	-4.8%
Other Family	12,272	19.6%	14,811	23.7%	20.7%
Male Householder, No Spouse	3,294	26.8%	4,277	28.9%	29.8%
Owner-Occupied	2,277	69.1%	2,869	67.1%	26.0%
Renter-Occupied	1,017	30.9%	1,408	32.9%	38.4%
Female Householder, No Spouse	8,978	73.2%	10,534	71.1%	17.3%
Owner-Occupied	5,726	63.8%	6,115	58.1%	6.8%
Renter-Occupied	3,252	36.2%	4,419	41.9%	35.9%
Non-Family Households	27,136	30.3%	31,772	33.7%	17.1%
Owner-Occupied	16,539	60.9%	19,838	62.4%	19.9%
Renter-Occupied	10,597	39.1%	11,934	37.6%	12.6%
Total	89,700	100.0%	94,156	100.0%	5.0%

Table 21.A.14
Group Quarters Population
 21. Lake County
 2000 & 2010 Census SF1 Data

Group Quarters Type	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Institutionalized					
Correctional Institutions	319	16.8%	295	15.8%	-7.5%
Juvenile Facilities	.	.	9	.5%	.
Nursing Homes	1,540	81.3%	1,566	83.7%	1.7%
Other Institutions	35	1.8%	0	.0%	-100.0%
Total	1,894	100.0%	1,870	100.0%	-1.3%
Noninstitutionalized					
College Dormitories	305	30.3%	468	51.1%	53.4%
Military Quarters	5	.5%	24	2.6%	380.0%
Other Noninstitutional	696	69.2%	424	46.3%	-39.1%
Total	1,006	34.7%	916	32.9%	-8.9%
Total Group Quarters Population	2,900	100.0%	2,786	100.0%	-3.9%

Table 21.A.15
Overcrowding and Severe Overcrowding
 21. Lake County
 2000 Census SF3 & 2010 Five-Year ACS Data

Data Source	No Overcrowding		Overcrowding		Severe Overcrowding		Total
	Households	% of Total	Households	% of Total	Households	% of Total	
Owner							
2000 Census	69,086	99.4%	346	.5%	70	.1%	69,502
2010 ACS	72,226	99.5%	282	.4%	74	.1%	72,582
Renter							
2000 Census	19,650	97.3%	318	1.6%	230	1.1%	20,198
2010 ACS	21,273	98.4%	305	1.4%	51	.2%	21,629
Total							
2000 Census	88,736	98.9%	664	.7%	300	.3%	89,700
2010 ACS	93,499	99.2%	587	.6%	125	.1%	94,211

Table 21.A.16
Households with Incomplete Plumbing Facilities
 21. Lake County
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Plumbing Facilities	89,530	93,985
Lacking Complete Plumbing Facilities	170	226
Total Households	89,700	94,211
Percent Lacking	.2%	.2%

Table 21.A.17
Households with Incomplete Kitchen Facilities
 21. Lake County
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Kitchen Facilities	89,467	93,937
Lacking Complete Kitchen Facilities	233	274
Total Households	89,700	94,211
Percent Lacking	.3%	.3%

Table 21.A.18
Cost Burden and Severe Cost Burden by Tenure
 21. Lake County
 2000 Census & 2010 Five-Year ACS Data

Data Source	Less Than 30%		31%-50%		Above 50%		Not Computed		Total
	Households	% of Total	Households	% of Total	Households	% of Total	Households	% of Total	
Owner With a Mortgage									
2000 Census	34,166	75.2%	7,702	17.0%	3,378	7.4%	160	.4%	45,406
2010 ACS	34,462	67.2%	11,435	22.3%	5,344	10.4%	49	.1%	51,290
Owner Without a Mortgage									
2000 Census	16,254	90.8%	939	5.2%	511	2.9%	204	1.1%	17,908
2010 ACS	17,879	84.0%	2,034	9.6%	1,261	5.9%	118	.6%	21,292
Renter									
2000 Census	12,291	61.4%	3,730	18.6%	2,930	14.6%	1,073	5.4%	20,024
2010 ACS	10,956	50.7%	4,604	21.3%	4,915	22.7%	1,154	5.3%	21,629
Total									
2000 Census	62,711	75.2%	12,371	14.8%	6,819	8.2%	1,437	1.7%	83,338
2010 ACS	63,297	67.2%	18,073	19.2%	11,520	12.2%	1,321	1.4%	94,211

Table 21.A.19
Median Housing Costs
 21. Lake County
 2000 Census SF3 & 2010 Five-Year ACS Data

Housing Cost	2000 Census	2010 ACS
Median Contract Rent	\$553	\$652
Median Home Value	\$127,900	\$158,100

B. BEA DATA

This section contains additional Bureau of Economic Analysis (BEA) data that address employment and income.

Table 21.B.1
Employment by Industry
 21. Lake County
 Select Years 2001–2010 BEA Data

NAICS Categories	2001	2005	2006	2007	2008	2009	2010	% Change 01–10
Farm employment	1,411	1,096	1,136	1,180	945	1,002	967	-31.5%
Forestry, fishing, related activities, and other	(D) ⁸⁴	(D)	(D)	(D)	(D)	(D)	(D)	.
Mining	(D)	(D)	(D)	(D)	(D)	(D)	(D)	.
Utilities	702	1,741	1,564	1,781	1,749	1,646	1,360	93.7%
Construction	7,216	7,547	7,091	7,133	6,600	5,943	5,876	-18.6%
Manufacturing	26,189	21,990	21,999	22,372	22,084	19,280	19,290	-26.3%
Wholesale trade	4,694	5,020	5,173	5,233	5,289	4,865	4,432	-5.6%
Retail trade	16,754	16,940	16,920	16,778	16,752	15,793	14,926	-10.9%
Transportation and warehousing	1,418	1,507	1,569	1,587	1,610	1,443	1,554	9.6%
Information	1,141	1,030	1,084	1,068	1,092	984	1,133	-.7%
Finance and insurance	3,463	3,365	3,393	3,666	3,899	4,119	4,210	21.6%
Real estate and rental and leasing	3,428	4,761	4,719	4,479	4,314	4,334	4,300	25.4%
Professional and technical services	5,452	5,977	5,813	5,937	5,842	5,409	5,290	-3.0%
Management of companies and enterprises	740	1,257	1,076	1,104	1,054	1,076	1,092	47.6%
Administrative and waste services	5,990	6,616	7,081	7,434	7,667	6,764	7,130	19.0%
Educational services	1,324	2,049	2,260	2,378	2,493	2,514	2,671	101.7%
Health care and social assistance	10,368	11,606	11,611	12,092	12,006	12,350	12,543	21.0%
Arts, entertainment, and recreation	1,653	2,062	2,070	2,084	2,102	1,988	2,046	23.8%
Accommodation and food services	8,842	9,688	9,665	9,675	9,609	9,317	9,139	3.4%
Other services, except public administration	6,625	6,743	6,836	6,901	6,600	6,476	6,381	-3.7%
Government and government enterprises	12,871	13,298	13,161	13,002	13,190	13,099	13,047	1.4%
Total	120,709	124,745	124,677	126,407	125,528	119,032	118,022	-2.2%

⁸⁴ (D): These data are not shown to avoid disclosure of confidential information, but estimates are included in the totals.

Table 21.B.2
Real Earnings by Industry

21. Lake County
 Select Years 2001–2010 BEA Data, Real 2011 Dollars

NAICS Categories	2001	2005	2006	2007	2008	2009	2010	% Change 00–10
Farm earnings	83,776	57,601	35,391	38,778	31,804	36,052	27,053	-67.7%
Forestry, fishing, related activities, and other	(D) ⁸⁵	(D)	(D)	(D)	(D)	(D)	(D)	.
Mining	(D)	(D)	(D)	(D)	(D)	(D)	(D)	.
Utilities	75,531	207,601	204,551	223,350	227,456	231,114	170,792	126.1%
Construction	341,148	344,367	329,331	292,444	282,637	255,044	288,324	-15.5%
Manufacturing	1,707,601	1,519,871	1,536,685	1,568,152	1,554,967	1,397,815	1,534,262	-10.2%
Wholesale trade	296,450	338,106	328,647	349,095	367,773	336,106	312,764	5.5%
Retail trade	485,046	505,666	489,622	471,985	471,487	449,748	416,084	-14.2%
Transportation and warehousing	58,540	64,804	63,650	60,750	50,917	44,419	49,878	-14.8%
Information	47,860	41,741	44,019	40,947	41,180	38,904	59,226	23.7%
Finance and insurance	150,893	145,204	146,619	134,902	128,683	126,234	123,910	-17.9%
Real estate and rental and leasing	56,957	77,201	68,588	50,036	61,058	67,668	63,204	11.0%
Professional and technical services	317,321	346,389	338,503	342,150	327,681	277,513	275,063	-13.3%
Management of companies and enterprises	81,747	120,635	98,520	100,057	98,187	107,638	108,852	33.2%
Administrative and waste services	151,158	176,593	188,798	204,036	213,408	185,023	201,616	33.4%
Educational services	30,677	47,819	51,424	54,757	58,714	58,345	61,847	101.6%
Health care and social assistance	451,561	542,106	524,636	519,534	537,235	557,686	564,113	24.9%
Arts, entertainment, and recreation	27,096	31,552	31,167	30,497	28,051	27,467	28,051	3.5%
Accommodation and food services	169,061	168,895	166,344	169,094	164,183	160,426	162,378	-4.0%
Other services, except public administration	228,884	226,965	225,936	224,925	214,476	206,177	208,064	-9.1%
Government and government enterprises	659,820	727,441	713,035	715,850	722,919	736,291	743,907	12.7%
Total	5,441,382	5,711,901	5,605,537	5,614,330	5,612,773	5,326,958	5,423,871	-.3%

⁸⁵ (D): These data are not shown to avoid disclosure of confidential information, but estimates are included in the totals.

Table 21.B.3
Real Earnings Per Job by Industry
 21. Lake County
 Select Years 2001–2010 BEA Data, 1,000's of Real 2011 Dollars

NAICS Categories	2001	2005	2006	2007	2008	2009	2010	% Change 00–10
Farm earnings	59,373	52,556	31,154	32,863	33,655	35,980	27,977	-52.9%
Forestry, fishing, related activities, and other	(D) ⁸⁶	(D)	(D)	(D)	(D)	(D)	(D)	.
Mining	(D)	(D)	(D)	(D)	(D)	(D)	(D)	.
Utilities	107,594	119,243	130,787	125,407	130,049	140,409	125,582	16.7%
Construction	47,277	45,630	46,444	40,999	42,824	42,915	49,068	3.8%
Manufacturing	65,203	69,116	69,852	70,094	70,411	72,501	79,537	22.0%
Wholesale trade	63,155	67,352	63,531	66,710	69,536	69,086	70,570	11.7%
Retail trade	28,951	29,850	28,937	28,131	28,145	28,478	27,876	-3.7%
Transportation and warehousing	41,284	43,002	40,567	38,280	31,625	30,783	32,097	-22.3%
Information	41,946	40,525	40,607	38,340	37,711	39,537	52,273	24.6%
Finance and insurance	43,573	43,151	43,212	36,798	33,004	30,647	29,432	-32.5%
Real estate and rental and leasing	16,615	16,215	14,534	11,171	14,153	15,613	14,699	-11.5%
Professional and technical services	58,203	57,954	58,232	57,630	56,091	51,306	51,997	-10.7%
Management of companies and enterprises	110,469	95,971	91,561	90,631	93,157	100,035	99,681	-9.8%
Administrative and waste services	25,235	26,692	26,663	27,446	27,835	27,354	28,277	12.1%
Educational services	23,170	23,338	22,754	23,026	23,552	23,208	23,155	-.1%
Health care and social assistance	43,553	46,709	45,184	42,965	44,747	45,157	44,974	3.3%
Arts, entertainment, and recreation	16,392	15,302	15,057	14,634	13,345	13,816	13,710	-16.4%
Accommodation and food services	19,120	17,433	17,211	17,477	17,086	17,219	17,768	-7.1%
Other services, except public administration	34,548	33,659	33,051	32,593	32,496	31,837	32,607	-5.6%
Government and government enterprises	51,264	54,703	54,178	55,057	54,808	56,210	57,017	11.2%
Average	45,079	45,789	44,961	44,415	44,713	44,752	45,956	1.95%

⁸⁶ (D): These data are not shown to avoid disclosure of confidential information, but estimates are included in the totals.

Table 21.B.4
Total Employment and Real Personal Income
 21. Lake County
 1969–2010 BEA Data, 2011 Dollars

Year	1,000s of 2011 Dollars						Per Capita Income	Total Employment	Real Average Earnings Per Job
	Earnings	Social Security Contributions	Residents Adjustments	Dividends, Interest, Rents	Transfer Payments	Personal Income			
1969	2,157,159	143,453	1,363,264	423,043	181,464	3,981,477	20,197	61,266	35,211
1970	2,238,095	146,375	1,167,509	430,714	207,877	3,897,820	19,754	63,641	35,166
1971	2,289,401	154,284	1,086,977	436,866	243,783	3,902,743	19,701	62,648	36,545
1972	2,376,788	169,550	1,146,806	440,248	264,128	4,058,419	20,476	64,164	37,044
1973	2,573,810	211,045	1,220,045	466,808	292,415	4,342,033	21,531	69,291	37,144
1974	2,707,041	230,379	1,204,101	497,178	329,209	4,507,151	22,155	73,569	36,797
1975	2,652,734	218,066	1,080,124	489,571	393,897	4,398,259	21,018	73,562	36,063
1976	2,827,875	237,044	1,181,720	501,809	405,950	4,680,310	22,312	76,113	37,153
1977	2,963,705	247,454	1,328,337	526,526	401,079	4,972,192	23,673	78,671	37,672
1978	3,136,459	271,559	1,438,396	570,441	398,307	5,272,045	24,963	82,807	37,876
1979	3,418,358	313,442	1,382,231	610,280	422,325	5,519,753	25,973	87,385	39,119
1980	3,380,682	309,240	1,310,579	704,047	498,918	5,584,987	26,204	88,280	38,294
1981	3,318,430	323,722	1,275,117	802,354	518,878	5,591,057	26,125	87,324	38,001
1982	3,233,107	320,233	1,170,000	870,095	598,210	5,551,179	25,906	85,586	37,776
1983	3,339,643	341,058	1,103,783	898,364	626,376	5,627,108	26,236	86,371	38,665
1984	3,624,037	384,753	1,144,022	1,008,901	612,004	6,004,210	27,932	91,569	39,578
1985	3,533,312	375,726	1,258,479	1,046,608	649,571	6,112,243	28,611	91,325	38,689
1986	3,380,777	374,366	1,349,394	1,040,148	679,354	6,075,306	28,517	91,284	37,037
1987	3,468,167	382,583	1,366,649	1,036,290	696,954	6,185,477	28,993	94,132	36,844
1988	3,629,272	408,577	1,401,256	1,079,750	725,445	6,427,146	30,084	96,296	37,689
1989	3,842,996	438,303	1,406,904	1,207,207	744,868	6,763,672	31,496	99,533	38,611
1990	4,069,983	475,828	1,350,309	1,202,248	795,813	6,942,524	32,153	103,370	39,372
1991	4,014,339	478,922	1,273,161	1,163,359	843,487	6,815,424	31,229	103,649	38,730
1992	4,289,236	503,781	1,231,557	1,144,394	916,123	7,077,530	32,102	104,386	41,091
1993	4,378,816	516,940	1,243,997	1,147,208	936,519	7,189,600	32,376	105,554	41,484
1994	4,582,743	553,478	1,278,245	1,226,556	943,087	7,477,153	33,525	109,904	41,697
1995	4,670,509	569,872	1,295,765	1,267,320	980,313	7,644,036	34,006	112,956	41,349
1996	4,835,391	585,845	1,238,942	1,350,882	1,015,686	7,855,058	34,696	115,199	41,974
1997	5,001,248	595,041	1,314,168	1,506,635	1,037,679	8,264,689	36,401	117,880	42,427
1998	5,264,872	605,380	1,366,075	1,572,872	1,062,163	8,660,602	38,037	119,495	44,059
1999	5,477,373	620,846	1,324,784	1,555,307	1,085,965	8,822,584	38,763	120,768	45,355
2000	5,581,169	611,172	1,378,572	1,581,849	1,132,314	9,062,733	39,828	122,703	45,485
2001	5,441,382	595,208	1,427,118	1,447,694	1,209,725	8,930,711	39,230	120,709	45,079
2002	5,370,204	573,534	1,392,686	1,338,351	1,274,367	8,802,073	38,649	117,997	45,511
2003	5,615,137	605,283	1,337,118	1,315,729	1,312,956	8,975,657	39,500	121,039	46,391
2004	5,641,514	618,446	1,354,237	1,201,857	1,334,436	8,913,597	39,125	122,895	45,905
2005	5,711,901	631,305	1,306,442	1,233,479	1,364,941	8,985,459	39,471	124,745	45,789
2006	5,605,537	630,072	1,384,598	1,387,768	1,415,088	9,162,919	40,152	124,677	44,961
2007	5,614,330	633,523	1,353,939	1,546,269	1,461,576	9,342,592	40,810	126,407	44,415
2008	5,612,773	644,638	1,357,591	1,514,316	1,543,180	9,383,222	40,814	125,528	44,713
2009	5,326,958	621,741	1,281,641	1,254,303	1,719,268	8,960,428	38,966	119,032	44,752
2010	5,423,871	627,828	1,315,733	1,259,559	1,775,232	9,146,566	39,758	118,022	45,956

C. BLS DATA

This section contains Bureau of Labor Statistics (BLS) data that address employment and income.

Table 21.C.1
Labor Force Statistics
21. Lake County
1990–2011 BLS Data

Year	Labor Force	Employment	Unemployment	Unemployment Rate	Statewide Unemployment Rate
1990	117,677	111,236	6,441	5.5%	5.7%
1991	116,377	108,817	7,560	6.5%	6.6%
1992	118,964	109,654	9,310	7.8%	7.4%
1993	121,147	112,094	9,053	7.5%	6.7%
1994	122,629	114,772	7,857	6.4%	5.6%
1995	122,254	116,304	5,950	4.9%	4.9%
1996	123,761	118,570	5,191	4.2%	5.0%
1997	125,750	120,944	4,806	3.8%	4.6%
1998	129,218	124,741	4,477	3.5%	4.3%
1999	131,466	126,568	4,898	3.7%	4.3%
2000	129,231	124,827	4,404	3.4%	4.0%
2001	130,710	125,406	5,304	4.1%	4.4%
2002	131,135	124,496	6,639	5.1%	5.7%
2003	131,589	124,180	7,409	5.6%	6.2%
2004	131,274	124,125	7,149	5.4%	6.1%
2005	131,175	124,436	6,739	5.1%	5.9%
2006	132,321	125,838	6,483	4.9%	5.4%
2007	134,486	127,254	7,232	5.4%	5.6%
2008	135,131	127,043	8,088	6.0%	6.5%
2009	134,699	123,599	11,100	8.2%	10.1%
2010	131,350	120,695	10,655	8.1%	10.0%
2011	131,619	122,291	9,328	7.1%	8.6%

D. HMDA DATA

The Home Mortgage Disclosure Act (HMDA) requires both depository and non-depository lenders to collect and publicly disclose information about housing-related loans and loan applications.⁸⁷ The information presented in this section presents detailed HMDA data, including denial rates and predatory lending including high annual percentage rate (APR) loans.

Table 21.D.1
Purpose of Loan by Year
21. Lake County
2004–2011 HMDA Data

Purpose	2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	7,556	8,647	8,116	5,805	3,996	4,090	3,467	3,209	44,886
Home Improvement	1,556	1,861	1,695	1,330	854	591	393	429	8,709
Refinancing	14,490	14,259	12,373	8,615	5,781	8,915	8,355	7,180	79,968
Total	23,602	24,767	22,184	15,750	10,631	13,596	12,215	10,818	133,563

Table 21.D.2
Occupancy Status for Home Purchase Loan Applications
21. Lake County
2004–2011 HMDA Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	Total
Owner-Occupied	7,024	7,977	7,300	5,301	3,722	3,923	3,299	3,041	41,587
Not Owner-Occupied	464	652	797	487	267	166	158	166	3,157
Not Applicable	68	18	19	17	7	1	10	2	142
Total	7,556	8,647	8,116	5,805	3,996	4,090	3,467	3,209	44,886

Table 21.D.3
Owner-Occupied Home Purchase Loan Applications by Loan Type
21. Lake County
2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Conventional	6,085	7,121	6,584	4,562	2,011	1,510	1,275	1,332	30,480
FHA - Insured	819	755	581	605	1,494	2,091	1,777	1,418	9,540
VA - Guaranteed	107	97	133	123	166	172	129	179	1,106
Rural Housing Service or Farm Service Agency	13	4	2	11	51	150	118	112	461
Total	7,024	7,977	7,300	5,301	3,722	3,923	3,299	3,041	41,587

⁸⁷ Data are considered “raw” because they contain entry errors and incomplete loan applications. Starting in 2004, the HMDA data made substantive changes in reporting. It modified the way it handled Hispanic data, loan interest rates, and the reporting of multifamily loan applications.

DENIAL RATES

Table 21.D.4
Loan Applications by Action Taken
 21. Lake County
 2004–2011 HMDA Data

Action	2004	2005	2006	2007	2008	2009	2010	2011	Total
Loan Originated	4,267	4,680	4,048	2,878	2,100	1,927	1,727	1,577	23,204
Application Approved but not Accepted	352	357	412	272	115	90	74	80	1,752
Application Denied	596	635	596	465	300	224	223	221	3,260
Application Withdrawn by Applicant	399	512	431	234	216	175	173	166	2,306
File Closed for Incompleteness	110	133	91	59	44	37	33	23	530
Loan Purchased by the Institution	1,300	1,651	1,720	1,383	945	1,469	1,069	974	10,511
Preapproval Request Denied	0	9	2	10	2	1	0	0	24
Preapproval Approved but not Accepted	0	0	0	0	0	0	0	0	0
Total	7,024	7,977	7,300	5,301	3,722	3,923	3,299	3,041	41,587
Denial Rate	12.3%	11.9%	12.8%	13.9%	12.5%	10.4%	11.4%	12.3%	12.3%

Table 21.D.5
Denial Rates by Gender of Applicant
 21. Lake County
 2004–2011 HMDA Data

Year	Male	Female	Not Available	Not Applicable	Average
2004	10.8%	12.7%	47.4%	%	12.3%
2005	10.6%	13.4%	30.6%	.0%	11.9%
2006	10.8%	15.8%	26.0%	%	12.8%
2007	12.0%	16.3%	33.3%	%	13.9%
2008	12.2%	11.7%	25.7%	100.0%	12.5%
2009	9.6%	10.9%	24.1%	%	10.4%
2010	10.0%	13.4%	18.1%	.0%	11.4%
2011	11.2%	13.4%	22.2%	%	12.3%
Average	10.9%	13.7%	29.7%	33.3%	12.3%

Table 21.D.6
Loan Applications by Selected Action Taken by Gender of Applicant
 21. Lake County
 2004–2011 HMDA Data

Gender		2004	2005	2006	2007	2008	2009	2010	2011	Total
Male	Originated	2,899	3,179	2,724	1,973	1,390	1,279	1,111	1,032	15,587
	Denied	351	376	329	269	193	136	124	130	1,908
	Denial Rate	10.8%	10.6%	10.8%	12.0%	12.2%	9.6%	10.0%	11.2%	10.9%
Female	Originated	1,308	1,407	1,213	841	655	604	556	496	7,080
	Denied	191	218	228	164	87	74	86	77	1,125
	Denial Rate	12.7%	13.4%	15.8%	16.3%	11.7%	10.9%	13.4%	13.4%	13.7%
Not Available	Originated	60	93	111	64	55	44	59	49	535
	Denied	54	41	39	32	19	14	13	14	226
	Denial Rate	47.4%	30.6%	26.0%	33.3%	25.7%	24.1%	18.1%	22.2%	29.7%
Not Applicable	Originated	0	1	0	0	0	0	1	0	2
	Denied	0	0	0	0	1	0	0	0	1
	Denial Rate	%	.0%	%	%	100.0%	%	.0%	%	33.3%
Total	Originated	4,267	4,680	4,048	2,878	2,100	1,927	1,727	1,577	23,204
	Denied	596	635	596	465	300	224	223	221	3,260
	Denial Rate	12.3%	11.9%	12.8%	13.9%	12.5%	10.4%	11.4%	12.3%	12.3%

Table 21.D.7
Denial Rates by Race/Ethnicity of Applicant
 21. Lake County
 2004–2011 HMDA Data

Race/Ethnicity	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	12.5%	42.1%	.0%	.0%	.0%	66.7%	.0%	60.0%	29.6%
Asian	9.7%	3.8%	10.0%	12.2%	8.8%	11.1%	14.3%	6.3%	9.4%
Black	24.7%	22.1%	28.0%	34.3%	27.5%	16.7%	26.1%	10.0%	25.7%
White	10.7%	10.5%	11.6%	12.7%	11.4%	9.6%	10.8%	11.5%	11.1%
Not Available	33.5%	27.2%	26.2%	26.9%	27.0%	22.1%	18.7%	23.4%	26.9%
Not Applicable	50.0%	.0%	%	%	%	0%	0.0%	%	33.3%
Average	12.3%	11.9%	12.8%	13.9%	12.5%	10.4%	11.4%	12.3%	12.3%
Non-Hispanic	11.2%	10.6%	11.7%	12.5%	11.6%	9.6%	10.6%	11.4%	11.2%
Hispanic	10.3%	19.3%	17.8%	37.0%	15.0%	20.7%	35.5%	30.0%	22.0%

Table 21.D.8
Loan Applications by Selected Action Taken by Race/Ethnicity of Applicant
 21. Lake County
 2004–2011 HMDA Data

Race		2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Originated	7	11	10	3	1	2	2	2	38
	Denied	1	8	0	0	0	4	0	3	16
	Denial Rate	12.5%	42.1%	.0%	.0%	.0%	.0%	.0%	60.0%	29.6%
Asian	Originated	56	50	45	43	31	16	24	15	280
	Denied	6	2	5	6	3	2	4	1	29
	Denial Rate	9.7%	3.8%	10.0%	12.2%	8.8%	11.1%	14.3%	6.3%	9.4%
Black	Originated	61	67	77	44	29	20	17	18	333
	Denied	20	19	30	23	11	4	6	2	115
	Denial Rate	24.7%	22.1%	28.0%	34.3%	27.5%	16.7%	26.1%	10.0%	25.7%
White	Originated	3,962	4,276	3,699	2,652	1,939	1,808	1,596	1,460	21,392
	Denied	477	503	484	386	249	191	193	190	2,673
	Denial Rate	10.7%	10.5%	11.6%	12.7%	11.4%	9.6%	10.8%	11.5%	11.1%
Not Available	Originated	179	275	217	136	100	81	87	82	1,157
	Denied	90	103	77	50	37	23	20	25	425
	Denial Rate	33.5%	27.2%	26.2%	26.9%	27.0%	22.1%	18.7%	23.4%	26.9%
Not Applicable	Originated	2	1	0	0	0	0	1	0	4
	Denied	2	0	0	0	0	0	0	0	2
	Denial Rate	33.5%	27.2%	26.2%	26.9%	27.0%	22.1%	18.7%	23.4%	33.3%
Total	Originated	4,267	4,680	4,048	2,878	2,100	1,927	1,727	1,577	23,204
	Denied	596	635	596	465	300	224	223	221	3,260
	Denial Rate	12.3%	11.9%	12.8%	13.9%	12.5%	10.4%	11.4%	12.3%	12.3%
Non-Hispanic	Originated	3,619	4,281	3,721	2,696	1,963	1,835	1,619	1,484	21,218
	Denied	457	505	491	384	257	194	192	191	2,671
	Denial Rate	11.2%	10.6%	11.7%	12.5%	11.6%	9.6%	10.6%	11.4%	11.2%
Hispanic	Originated	61	92	88	51	34	23	20	21	390
	Denied	7	22	19	30	6	6	11	9	110
	Denial Rate	10.3%	19.3%	17.8%	37.0%	15.0%	20.7%	35.5%	30.0%	22.0%

Table 21.D.9
Loan Applications by Reason for Denial
 21. Lake County
 2004–2011 HMDA Data

Denial Reason	2004	2005	2006	2007	2008	2009	2010	2011	Total
Debt-to-Income Ratio	95	70	77	90	63	54	54	52	555
Employment History	5	11	8	7	9	6	5	4	55
Credit History	116	119	105	87	47	51	59	44	628
Collateral	45	71	61	40	58	43	42	31	391
Insufficient Cash	13	18	9	10	8	4	6	3	71
Unverifiable Information	21	26	28	32	13	7	4	5	136
Credit Application Incomplete	62	51	55	48	27	15	28	38	324
Mortgage Insurance Denied	0	1	0	1	2	2	2	1	9
Other	106	148	104	66	31	20	13	15	503
Missing	133	120	149	84	42	22	10	28	588
Total	596	635	596	465	300	224	223	221	3,260

Table 21.D.10
Denial Rates by Income of Applicant
 21. Lake County
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	40.0%	50.0%	39.1%	50.0%	75.0%	27.3%	60.0%	66.7%	47.1%
\$15,001–\$30,000	19.2%	22.1%	23.2%	25.0%	21.5%	12.4%	21.3%	20.9%	20.9%
\$30,001–\$45,000	14.4%	12.7%	15.9%	17.4%	14.3%	9.9%	13.1%	13.2%	14.1%
\$45,001–\$60,000	12.1%	12.6%	13.7%	14.2%	13.0%	9.5%	9.8%	11.4%	12.4%
\$60,001–\$75,000	8.4%	10.5%	11.4%	11.1%	9.9%	9.4%	9.6%	10.1%	10.1%
Above \$75,000	6.9%	7.8%	7.2%	8.1%	8.3%	9.8%	7.5%	8.1%	7.8%
Data Missing	21.4%	14.0%	14.1%	29.9%	27.8%	39.1%	20.0%	33.3%	19.5%
Total	12.3%	11.9%	12.8%	13.9%	12.5%	10.4%	11.4%	12.3%	12.3%

Table 21.D.11
Denial Rates of Loans by Race/Ethnicity and Income of Applicant
 21. Lake County
 2004–2011 HMDA Data

Race	<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	Above \$75K	Data Missing	Average
American Indian	%	62.5%	.0%	30.0%	45.5%	17.6%	.0%	29.6%
Asian	.0%	8.0%	12.5%	13.7%	13.5%	7.0%	.0%	9.4%
Black	50.0%	31.8%	30.2%	22.7%	27.0%	20.2%	43.8%	25.7%
White	49.4%	19.4%	12.8%	11.2%	8.9%	7.2%	12.9%	11.1%
Not Available	43.8%	37.3%	28.9%	28.4%	22.4%	13.4%	62.0%	26.9%
Not Applicable	%	.0%	%	100.0%	%	.0%	.0%	33.3%
Average	47.1%	20.9%	14.1%	12.4%	10.1%	7.8%	19.5%	12.3%
Non-Hispanic Ethnicity	45.0%	19.2%	13.0%	11.2%	9.3%	7.5%	13.3%	11.2%
Hispanic (Ethnicity)	60.0%	32.7%	17.8%	22.4%	23.1%	8.1%	35.0%	22.0%

Table 21.D.12
Loan Applications by Reason for Denial by Race/Ethnicity of Applicant
 21. Lake County
 2004–2011 HMDA Data

Denial Reason	American Indian	Asian	Black	White	Not Available	Not Applicable	Total	Hispanic (Ethnicity)
Debt-to-Income Ratio	2	9	19	466	59	0	555	23
Employment History	0	1	2	43	9	0	55	5
Credit History	6	7	25	530	60	0	628	14
Collateral	0	1	10	330	50	0	391	15
Insufficient Cash	1	0	3	62	5	0	71	5
Unverifiable Information	1	3	8	112	11	1	136	0
Credit Application Incomplete	0	2	9	264	49	0	324	5
Mortgage Insurance Denied	0	0	0	9	0	0	9	0
Other	1	3	15	410	73	1	503	21
Missing	5	3	24	447	109	0	588	22
Total	16	29	115	2,673	425	2	3,260	110
% Missing	31.3%	10.3%	20.9%	16.7%	25.6%	.0%	18.0%	20.0%

Table 21.D.13
Loan Applications by Income of Applicant: Originated and Denied
 21. Lake County
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Loan Originated	12	9	14	5	2	8	2	3	55
	Application Denied	8	9	9	5	6	3	3	6	49
	Denial Rate	40.0%	50.0%	39.1%	50.0%	75.0%	27.3%	60.0%	66.7%	47.1%
\$15,001–\$30,000	Loan Originated	417	348	304	216	172	218	189	178	2,042
	Application Denied	99	99	92	72	47	31	51	47	538
	Denial Rate	19.2%	22.1%	23.2%	25.0%	21.5%	12.4%	21.3%	20.9%	20.9%
\$30,001–\$45,000	Loan Originated	1,097	1,159	814	604	511	491	399	363	5,438
	Application Denied	185	169	154	127	85	54	60	55	889
	Denial Rate	14.4%	12.7%	15.9%	17.4%	14.3%	9.9%	13.1%	13.2%	14.1%
\$45,001–\$60,000	Loan Originated	890	951	863	632	421	411	340	287	4,795
	Application Denied	122	137	137	105	63	43	37	37	681
	Denial Rate	12.1%	12.6%	13.7%	14.2%	13.0%	9.5%	9.8%	11.4%	12.4%
\$60,001–\$75,000	Loan Originated	579	708	574	416	282	259	236	213	3,267
	Application Denied	53	83	74	52	31	27	25	24	369
	Denial Rate	8.4%	10.5%	11.4%	11.1%	9.9%	9.4%	9.6%	10.1%	10.1%
Above \$75,000	Loan Originated	1,096	1,364	1,303	958	699	526	553	521	7,020
	Application Denied	81	115	101	84	63	57	45	46	592
	Denial Rate	6.9%	7.8%	7.2%	8.1%	8.3%	9.8%	7.5%	8.1%	7.8%
Data Missing	Loan Originated	176	141	176	47	13	14	8	12	587
	Application Denied	48	23	29	20	5	9	2	6	142
	Denial Rate	21.4%	14.0%	14.1%	29.9%	27.8%	39.1%	20.0%	33.3%	19.5%
Total	Loan Originated	4,267	4,680	4,048	2,878	2,100	1,927	1,727	1,577	23,204
	Application Denied	596	635	596	465	300	224	223	221	3,260
	Denial Rate	12.3%	11.9%	12.8%	13.9%	12.5%	10.4%	11.4%	12.3%	12.3%

Table 21.D.14
Loan Applications by Income and Race/Ethnicity of Applicant: Originated and Denied
 21. Lake County
 2004–2011 HMDA Data

Race		<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	> \$75K	Data Missing	Total
American Indian	Loan Originated	0	3	6	7	6	14	2	38
	Application Denied	0	5	0	3	5	3	0	16
	Denial Rate	%	62.5%	.0%	30.0%	45.5%	17.6%	.0%	29.6%
Asian	Loan Originated	3	23	35	44	32	132	11	280
	Application Denied	0	2	5	7	5	10	0	29
	Denial Rate	.0%	8.0%	12.5%	13.7%	13.5%	7.0%	.0%	9.4%
Black	Loan Originated	1	15	67	92	54	95	9	333
	Application Denied	1	7	29	27	20	24	7	115
	Denial Rate	50.0%	31.8%	30.2%	22.7%	27.0%	20.2%	43.8%	25.7%
White	Loan Originated	42	1,879	5,060	4,455	3,026	6,401	529	21,392
	Application Denied	41	452	745	564	296	497	78	2,673
	Denial Rate	49.4%	19.4%	12.8%	11.2%	8.9%	7.2%	12.9%	11.1%
Not Available	Loan Originated	9	121	270	197	149	376	35	1,157
	Application Denied	7	72	110	78	43	58	57	425
	Denial Rate	43.8%	37.3%	28.9%	28.4%	22.4%	13.4%	62.0%	26.9%
Not Applicable	Loan Originated	0	1	0	0	0	2	1	4
	Application Denied	0	0	0	2	0	0	0	2
	Denial Rate	%	.0%	%	100.0%	%	.0%	.0%	33.3%
Total	Loan Originated	55	2,042	5,438	4,795	3,267	7,020	587	23,204
	Application Denied	49	538	889	681	369	592	142	3,260
	Denial Rate	47.1%	20.9%	14.1%	12.4%	10.1%	7.8%	19.5%	12.3%
Non-Hispanic Ethnicity	Loan Originated	44	1,828	4,927	4,424	3,024	6,455	516	21,218
	Application Denied	36	433	735	556	310	522	79	2,671
	Denial Rate	45.0%	19.2%	13.0%	11.2%	9.3%	7.5%	13.3%	11.2%
Hispanic (Ethnicity)	Loan Originated	2	66	139	83	30	57	13	390
	Application Denied	3	32	30	24	9	5	7	110
	Denial Rate	60.0%	32.7%	17.8%	22.4%	23.1%	8.1%	35.0%	22.0%

PREDATORY LENDING

Table 21.D.15
Originated Owner-Occupied Loans by HAL Status
 21. Lake County
 2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Other	3,880	3,754	3,312	2,613	1,974	1,821	1,717	1,574	20,645
HAL	387	926	736	265	126	106	10	3	2,559
Total	4,267	4,680	4,048	2,878	2,100	1,927	1,727	1,577	23,204
Percent HAL	9.1%	19.8%	18.2%	9.2%	6.0%	5.5%	.6%	.2%	11.0%

Table 21.D.16
Loans by Loan Purpose by HAL Status
 21. Lake County
 2004–2011 HMDA Data

Loan Purpose		2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	Other	3,880	3,754	3,312	2,613	1,974	1,821	1,717	1,574	20,645
	HAL	387	926	736	265	126	106	10	3	2,559
	Percent HAL	9.1%	19.8%	18.2%	9.2%	6.0%	5.5%	.6%	.2%	11.0%
Home Improvement	Other	449	545	569	447	269	157	122	152	2,710
	HAL	116	165	151	83	48	28	11	13	615
	Percent HAL	20.5%	23.2%	21.0%	15.7%	15.1%	15.1%	8.3%	7.9%	18.5%
Refinancing	Other	4,998	3,732	2,927	2,249	1,909	3,805	4,046	3,453	27,119
	HAL	829	1,359	1,188	471	225	184	35	14	4,305
	Percent HAL	14.2%	26.7%	28.9%	17.3%	10.5%	4.6%	.9%	.4%	13.7%
Total	Other	9,327	8,031	6,808	5,309	4,152	5,783	5,885	5,179	50,474
	HAL	1,332	2,450	2,075	819	126	106	10	3	7,479
	Percent HAL	12.5%	23.4%	23.4%	13.4%	8.8%	5.2%	.9%	.6%	12.9%

Table 21.D.17
HALs Originated by Race of Borrower
 21. Lake County
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	1	3	1	1	1	0	0	0	7
Asian	3	9	1	1	0	0	0	0	14
Black	11	31	35	10	3	2	1	0	93
White	322	749	635	234	117	99	9	3	2,168
Not Available	50	134	64	19	5	5	0	0	277
Not Applicable	0	0	0	0	0	0	0	0	0
Total	387	926	736	265	126	106	10	3	2,559
Hispanic (Ethnicity)	4	28	32	5	3	1	0	0	73

Table 21.D.18
Rate of HALs Originated by Race/Ethnicity of Borrower
 21. Lake County
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	14.3%	27.3%	10.0%	33.3%	100.0%	.0%	.0%	.0%	18.4%
Asian	5.4%	18.0%	2.2%	2.3%	.0%	.0%	.0%	.0%	5.0%
Black	18.0%	46.3%	45.5%	22.7%	10.3%	10.0%	5.9%	.0%	27.9%
White	8.1%	17.5%	17.2%	8.8%	6.0%	5.5%	.6%	.2%	10.1%
Not Available	27.9%	48.7%	29.5%	14.0%	5.0%	6.2%	.0%	.0%	23.9%
Not Applicable	.0%	.0%	%	%	%	%	.0%	%	0%
Average	9.1%	19.8%	18.2%	9.2%	6.0%	5.5%	0.6%	0.2%	11.0%
Non-Hispanic Ethnicity	8.5%	17.7%	17.0%	9.0%	5.9%	5.5%	.6%	.1%	10.2%
Hispanic (Ethnicity)	6.6%	30.4%	36.4%	9.8%	8.8%	4.3%	.0%	.0%	18.7%

Table 21.D.19
Loans by HAL Status by Race/Ethnicity of Borrower
 21. Lake County
 2004–2011 HMDA Data

Race	Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Other	6	8	9	2	0	2	2	2	31
	HAL	1	3	1	1	1	0	0	0	7
	Percent HAL	14.3%	27.3%	10.0%	33.3%	100.0%	.0%	.0%	.0%	18.4%
Asian	Other	53	41	44	42	31	16	24	15	266
	HAL	3	9	1	1	0	0	0	0	14
	Percent HAL	5.4%	18.0%	2.2%	2.3%	.0%	.0%	.0%	.0%	5.0%
Black	Other	50	36	42	34	26	18	16	18	240
	HAL	11	31	35	10	3	2	1	0	93
	Percent HAL	18.0%	46.3%	45.5%	22.7%	10.3%	10.0%	5.9%	.0%	27.9%
White	Other	3,640	3,527	3,064	2,418	1,822	1,709	1,587	1,457	19,224
	HAL	322	749	635	234	117	99	9	3	2,168
	Percent HAL	8.1%	17.5%	17.2%	8.8%	6.0%	5.5%	0.6%	0.2%	10.1%
Not Available	Other	129	141	153	117	95	76	87	82	880
	HAL	50	134	64	19	5	5	0	0	277
	Percent HAL	27.9%	48.7%	29.5%	14.0%	5.0%	6.2%	.0%	.0%	23.9%
Not Applicable	Other	2	1	0	0	0	0	1	1	4
	HAL	0	0	0	0	0	0	0	0	0
	Percent HAL	.0%	.0%	%	%	%	%	.0%	%	0.0%
Total	Other	3,880	3,754	3,312	2,613	1,974	1,821	1,717	1,574	20,645
	HAL	387	926	736	265	126	106	10	3	2,559
	Percent HAL	9.1%	19.8%	18.2%	9.2%	6.0%	5.5%	.6%	.2%	11.0%
Non-Hispanic Ethnicity	Other	3,311	3,525	3,087	2,454	1,847	1,734	1,609	1,482	19,049
	HAL	308	756	634	242	116	101	10	2	2,169
	Percent HAL	8.5%	17.7%	17.0%	9.0%	5.9%	5.5%	.6%	.1%	10.2%
Hispanic (Ethnicity)	Other	57	64	56	46	31	22	20	21	317
	HAL	4	28	32	5	3	1	0	0	73
	Percent HAL	6.6%	30.4%	36.4%	9.8%	8.8%	4.3%	.0%	.0%	18.7%

Table 21.D.20
Rates of HALs by Income of Borrower
 21. Lake County
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Average
\$15,000 or Below	.0%	.0%	7.1%	.0%	.0%	.0%	.0%	.0%	1.8%
\$15,001–\$30,000	11.8%	22.7%	20.7%	10.6%	8.7%	6.4%	.5%	.6%	12.0%
\$30,001–\$45,000	12.4%	24.8%	22.4%	9.6%	6.7%	7.7%	.8%	.0%	13.6%
\$45,001–\$60,000	10.3%	24.8%	22.2%	10.4%	7.1%	6.3%	.3%	.3%	13.4%
\$60,001–\$75,000	6.0%	17.4%	20.2%	9.1%	6.7%	5.4%	.8%	.0%	10.6%
Above \$75,000	5.9%	12.1%	9.7%	7.1%	4.0%	2.5%	0.5%	.2%	6.7%
Data Missing	5.7%	25.5%	31.8%	25.5%	.0%	7.1%	.0%	.0%	19.6%
Average	9.1%	19.8%	18.2%	9.2%	6.0%	5.5%	.6%	.2%	11.0%

Table 21.D.21
Loans by HAL Status by Income of Borrower
 21. Lake County
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Other	12	9	13	5	2	8	2	3	54
	HAL	0	0	1	0	0	0	0	0	1
	Percent HAL	.0%	.0%	7.1%	.0%	.0%	.0%	.0%	.0%	1.8%
\$15,001–\$30,000	Other	368	269	241	193	157	204	188	177	1,797
	HAL	49	79	63	23	15	14	1	1	245
	Percent HAL	11.8%	22.7%	20.7%	10.6%	8.7%	6.4%	.5%	.6%	12.0%
\$30,001–\$45,000	Other	961	872	632	546	477	453	396	363	4,700
	HAL	136	287	182	58	34	38	3	0	738
	Percent HAL	12.4%	24.8%	22.4%	9.6%	6.7%	7.7%	.8%	.0%	13.6%
\$45,001–\$60,000	Other	798	715	671	566	391	385	339	286	4,151
	HAL	92	236	192	66	30	26	1	1	644
	Percent HAL	10.3%	24.8%	22.2%	10.4%	7.1%	6.3%	.3%	.3%	13.4%
\$60,001–\$75,000	Other	544	585	458	378	263	245	234	213	2,920
	HAL	35	123	116	38	19	14	2	0	347
	Percent HAL	6.0%	17.4%	20.2%	9.1%	6.7%	5.4%	.8%	.0%	10.6%
Above \$75,000	Other	1,031	1,199	1,177	890	671	513	550	520	6,551
	HAL	65	165	126	68	28	13	3	1	469
	Percent HAL	5.9%	12.1%	9.7%	7.1%	4.0%	2.5%	.5%	.2%	6.7%
Data Missing	Other	166	105	120	35	13	13	8	12	472
	HAL	10	36	56	12	0	1	0	0	115
	Percent HAL	5.7%	25.5%	31.8%	25.5%	.0%	7.1%	.0%	.0%	19.6%
Total	Other	3,880	3,754	3,312	2,613	1,974	1,821	1,717	1,574	20,645
	HAL	387	926	736	265	126	106	10	3	2,559
	Percent HAL	9.1%	19.8%	18.2%	9.2%	6.0%	5.5%	.6%	.2%	11.0%

E. CRA DATA

Additional data tables related to Community Reinvestment Act (CRA) data are presented in this section.

Table 21.E.1
Small Business Loans Originated: \$100,000 or Less by Tract MFI
 21. Lake County
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000		129	2,149	1,347		3,625
2001		142	2,432	1,516		4,090
2002		192	3,123	1,982		5,297
2003		378	3,374	1,903		5,655
2004		345	3,407	2,015		5,767
2005		394	3,557	2,215		6,166
2006		461	4,721	2,931		8,113
2007		471	5,114	3,386		8,971
2008		378	3,885	2,633		6,896
2009		178	1,621	1,201		3,000
2010		169	1,462	1,067		2,698
2011		184	1,776	1,271		3,231
Total	0	3,421	36,621	23,467	0	63,509
Loan Amount (\$1,000s)						
2000		1,781	31,746	19,114		52,641
2001		1,547	29,453	16,959		47,959
2002		2,406	34,692	22,597		59,695
2003		3,818	34,987	22,374		61,179
2004		3,633	33,508	25,233		62,374
2005		4,748	40,755	25,477		70,980
2006		5,072	50,588	33,500		89,160
2007		5,570	54,417	35,935		95,922
2008		4,571	40,943	29,117		74,631
2009		2,906	22,417	16,170		41,493
2010		2,831	23,635	17,204		43,670
2011		3,619	28,189	19,044		50,852
Total	0	42,502	425,330	282,724	0	750,556

Table 21.E.2
Small Business Loans Originated: \$100,001 to \$250,000 by Tract MFI
 21. Lake County
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000		9	88	73		170
2001		10	125	83		218
2002		11	126	97		234
2003		22	96	61		179
2004		28	113	85		226
2005		21	126	63		210
2006		26	129	69		224
2007		15	117	70		202
2008		14	97	77		188
2009		10	45	46		101
2010		11	93	57		161
2011		19	96	73		188
Total	0	196	1,251	854	0	2,301
Loan Amount (\$1,000s)						
2000		1,610	15,462	13,892		30,964
2001		1,833	22,787	15,216		39,836
2002		1,908	22,719	17,596		42,223
2003		4,059	16,854	12,003		32,916
2004		5,254	20,059	15,470		40,783
2005		3,926	22,489	11,510		37,925
2006		4,659	23,516	12,408		40,583
2007		2,824	20,433	13,226		36,483
2008		2,385	16,342	13,955		32,682
2009		1,913	7,234	7,779		16,926
2010		2,255	16,070	10,338		28,663
2011		3,547	16,850	13,221		33,618
Total	0	36,173	220,815	156,614	0	413,602

Table 21.E.3
Small Business Loans Originated: More than \$250,000 by Tract MFI
 21. Lake County
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000		10	87	67		164
2001		8	96	87		191
2002		11	143	102		256
2003		26	126	89		241
2004		14	135	108		257
2005		19	131	94		244
2006		16	116	87		219
2007		24	106	87		217
2008		15	81	60		156
2009		16	71	67		154
2010		20	119	70		209
2011		23	106	86		215
Total	0	202	1,317	1,004	0	2,523
Loan Amount (\$1,000s)						
2000		6,136	47,375	32,233		85,744
2001		4,653	49,762	43,386		97,801
2002		6,074	74,518	51,195		131,787
2003		14,998	66,917	44,389		126,304
2004		8,620	70,629	58,350		137,599
2005		10,106	72,146	47,476		129,728
2006		9,682	60,484	50,041		120,207
2007		15,038	61,444	41,906		118,388
2008		8,364	41,779	32,230		82,373
2009		9,460	41,123	36,809		87,392
2010		11,809	63,110	38,015		112,934
2011		12,448	55,775	47,458		115,681
Total	0	117,388	705,062	523,488	0	1,345,938

Table 21.E.4
Small Business Loans to Businesses with Gross Annual Revenues of Less Than \$1 Million by Tract MFI
 21. Lake County
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000		55	961	575		1,591
2001		59	1,173	626		1,858
2002		62	931	580		1,573
2003		119	1,180	650		1,949
2004		105	1,169	725		1,999
2005		162	1,619	1,005		2,786
2006		178	1,822	1,051		3,051
2007		162	1,952	1,139		3,253
2008		104	1,197	757		2,058
2009		57	558	371		986
2010		50	530	372		952
2011		78	797	532		1,407
Total	0	1,191	13,889	8,383	0	23,463
Loan Amount (\$1,000s)						
2000		2,004	41,576	26,581		70,161
2001		2,686	41,032	31,481		75,199
2002		4,506	53,827	36,105		94,438
2003		6,610	51,248	31,859		89,717
2004		3,795	37,287	31,888		72,970
2005		4,982	47,916	32,125		85,023
2006		6,116	45,114	30,670		81,900
2007		4,607	48,316	26,161		79,084
2008		3,235	29,684	23,540		56,459
2009		2,386	17,980	12,867		33,233
2010		3,686	25,975	14,661		44,322
2011		2,487	27,590	18,318		48,395
Total	0	47,100	467,545	316,256	0	830,901

F. COMPLAINT DATA

This section contains data regarding fair housing complaints, as provided by the U.S. Department of Housing and Urban Development (HUD), the Ohio Civil Rights Commission (OCRC), the Housing Resource and Advocacy Center, and the Fair Housing Resource Center (FHRC).

HUD COMPLAINTS

Table 21.F.1
Fair Housing Complaints by Basis
21. Lake County
2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color	1									1
Disability	7	10	15	2	16	5	11	6		72
Family Status	1	1	2	2	2	6	6	6	1	27
National Origin	1	1		1		2	1			6
Race	8	2	3	2	3	3	2	1	1	25
Religion										
Sex			4				1	1	1	7
Total Bases	18	14	24	7	21	16	21	14	3	138
Total Complaints	16	13	20	6	21	15	16	12	3	122

Table 21.F.2
Fair Housing Complaints by Issue
21. Lake County
2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Discriminatory advertisement - rental		1			1	2		3		7
Discriminatory acts under Section 818 (coercion, etc.)	2		1				2		1	6
Discrimination in terms, conditions or privileges relating to rental	3	5	3	3	6	5	6	4		35
Failure to make reasonable accommodation	5	4	13		3	2	5	2		34
Discriminatory refusal to rent	6	5	9		3	2	6	2		33
False denial or representation of availability - rental	1	2								3
Otherwise deny or make housing available							1	2		3
Discriminatory advertising, statements, and notices	1	1	1		7	4	7	2		23
Discriminatory refusal to negotiate for rental					1		1			2
Discrimination in the appraising of residential real property						2				2
Redlining - insurance					2					2
Discriminatory terms, conditions, privileges, or services and facilities	1	2	1	2	3		4	4	1	18
Discriminatory refusal to rent and negotiate for rental		2	1		2	2		2	1	10
Discriminatory refusal to sell							1			1
Discrimination in the terms or conditions for making loans								1		1
Discrimination in services and facilities relating to rental				1						1
Other discriminatory acts							1			1
Restriction of choices relative to a rental			1							1
Use of discriminatory indicators	1									1
Total Issues	20	22	30	6	28	19	34	22	3	184
Total Complaints	16	13	20	6	21	15	16	12	3	122

Table 21.F.3
Fair Housing Complaints by Closure Status
 21. Lake County
 2004–2012 HUD Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Administrative Closure	1		1	1	2	3	2	1		11
Cause (FHAP)	4	4	5	2	9	5	9	3		41
Conciliated / Settled	7	4	11	2	9	5	3	3		44
No Cause	4	5	3	1	1	2	2	3		21
Open								2	3	5
Total Complaints	16	13	20	6	21	15	16	12	3	122

HUD Complaints Found With Cause

Table 21.F.4
Fair Housing Complaints Found With Cause by Basis
 21. Lake County
 2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability	7	6	13	2	16	4	9	4		61
Family Status	1	1	2	2	2	5	6	3		22
National Origin	1	1				1				3
Race	3	1	1			1	1			7
Sex			2				1	1		4
Total Bases	12	9	18	4	18	11	17	8		97
Total Complaints	11	8	16	4	18	10	12	6		85

Table 21.F.5
Fair Housing Complaints Found With Cause by Issue
 21. Lake County
 2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Discriminatory refusal to rent and negotiate for rental			1		2	2				5
Discriminatory advertisement - rental		1			1	1		1		4
Discriminatory refusal to rent	4	3	8		2	2	6	2		27
Failure to make reasonable accommodation	5	2	11		3	2	3	1		27
Discrimination in terms, conditions or privileges relating to rental	2	3	3	1	6	2	5	3		25
Discriminatory advertising, statements, and notices	1	1	1		7	4	7	2		23
False denial or representation of availability - rental			2							2
Discriminatory terms, conditions, privileges, or services and facilities	1	2		2	3		3	2		13
Discriminatory refusal to negotiate for rental					1					1
Discrimination in the appraising of residential real property						1				1
Discrimination in services and facilities relating to rental				1						1
Other discriminatory acts							1			1
Restriction of choices relative to a rental			1							1
Discriminatory acts under Section 818 (coercion, etc.)		1								1
Total Issues	14	14	25	4	25	14	25	11	0	132
Total Complaints	11	8	16	4	18	10	12	6		85

OHIO CIVIL RIGHTS COMMISSION COMPLAINTS

Table 21.F.6
Fair Housing Complaints by Basis
 21. Lake County
 2004–2012 OCRC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color									1	1
Disability	7	9	13	3	10	3	7	7	2	61
Family Status	1	1	3	4	1	1	3	6		20
Gender			4		1	1		1	1	8
National Origin	1	1		2			2			6
Race	8	5	5	4	3	4	4	1	1	35
Retaliation				1		1	1	4	1	8
Total Bases	17	16	25	14	16	9	17	19	6	139
Total Complaints	16	16	21	10	16	8	14	14	2	117

Table 21.F.7
Fair Housing Complaints by Issue
 21. Lake County
 2004–2012 OCRC Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Advertising	2							3		5
Exclusion	3	6	1	4	6	2	2			24
Harassment	3	4				1				8
Other	4	7	10	4	5	2	9	8		49
Reasonable Accommodation	3	3	9	1	7	3	1	1	1	29
Terms and Conditions	5	3	2	5	3	2	2	5	1	28
Total Issues	20	23	22	14	21	10	14	17	2	143
Total Complaints	16	16	21	10	16	8	14	14	2	117

Table 21.F.8
Fair Housing Complaints by Closure Status
 21. Lake County
 2004–2012 OCRC Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Administrative Closure				4			1	1		6
CP Failed to Cooperate				1		1	2			4
CP Withdrawal – No Benefit			1		3			1	1	6
No Cause Finding Issued	3	5	4	2	1	1	1	4		21
No Jurisdiction							1		1	2
Open Charge Closed By Legal Activity		2	1							3
Settlement With Benefits	3	2	11	2	9	4	6	5		42
Successful Conciliation	1		2		2	1	1	1		8
Withdrawal With Benefits	9	7	2	1	1	1	2	2		25
Total Complaints	16	16	21	10	16	8	14	14	2	117

FAIR HOUSING RESOURCE CENTER COMPLAINTS

Table 21.F.11
Fair Housing Complaints by Basis
 21. Lake County
 2004– 2012 FHRC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability	43	20	20	12	4	13	25	11	15	163
Family Status	5	12	4	2	2	2		2	1	30
National Origin	4		4					1		9
Race	15	6	6	2	4	2	6	6	2	49
Sex	1		3			1				5
Other	2	4	11	16	11	6	10	12	13	85
Total Bases	70	42	48	32	21	24	41	32	31	341
Total Complaints	70	42	48	32	21	24	40	28	30	335

Table 21.F.12
Fair Housing Complaints by Issue Type
 21. Lake County
 2004– 2012 FHRC Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Rental	70	41	46	25	19	23	39	28	29	320
Sales		1								1
Advertising			2	7	2	1	1		1	14
Total	70	42	48	32	21	24	40	28	30	335

Table 21.F.13
Fair Housing Complaints by Closure Status
 21. Lake County
 2004– 2012 FHRC Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Investigated and referred to HUD/OCRC	2	1				1	2	1		7
Investigated and settled		1								1
Settled through counseling	61	36	41	29	19	18	34	23	24	285
Complaint filed in federal court								1		21
Reasonable Accommodation Granted	6	4	3	3		4	5	4	6	35
Referred to OCRC	1		4		1					6
Total	70	42	48	32	21	24	40	28	30	335

THE HOUSING RESEARCH AND ADVOCACY CENTER

Table 21.F.14
Fair Housing Complaints by Basis

Lake County
2004–2012 HRAC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability								2	1	3
Race		1				1				2
Total Bases	0	1	0	0	0	1	0	2	1	5
Total Complaints		1				1		2	1	5

Table 21.F.15
Fair Housing Complaints by Issue

Lake County
2004–2012 HRAC Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Rental						1		2		3
Sale		1								1
Other									1	1
Total	0	1	0	0	0	1	0	2	1	5
Total Complaints		1				1		2	1	5

Table 21.F.16
Fair Housing Complaints by Action Taken

21 Lake County
2004–2012 HRAC Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Fair Housing Info Given								1	1	2
Referred to OCRC			1			1				2
Reasonable Accommodation								1		1
HRAC Conducted Test			1							1
Total	0	2	0	0	0	1	0	2	1	6
Total Complaints		1				1		2	1	5

G. FAIR HOUSING SURVEY FOR HOUSING STAKEHOLDERS DATA

This section presents public involvement data gathered through the 2012–2013 Fair Housing Survey for Housing Stakeholders.

Table 21.G.1
Primary Role of Respondent

21. Lake County
2012–2013 Fair Housing Survey for Housing
Stakeholders Data

Primary Role	Total
Local Government	4
Real Estate	2
Advocate/Service Provider	10
Construction/Development	1
Other Role	1
Total	18

FEDERAL, STATE, AND LOCAL LAWS

Table 21.G.2
**Familiarity with Fair
Housing Laws**

21. Lake County
2012–2013 Fair Housing Survey
for Housing Stakeholders Data

Familiarity	Total
Not Familiar	0
Somewhat Familiar	6
Very Familiar	10
Missing	2
Total	18

Table 21.G.3
Perceptions About Fair Housing Laws

21. Lake County
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?	14	1	1	2	18
Are fair housing laws difficult to understand or follow?	7	6	2	3	18
Do you think fair housing laws should be changed?	3	8	5	2	18
Do you think fair housing laws are adequately enforced?	15		1	2	18

Table 21.G.4
Fair Housing Activities
 21. Lake County

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?	15		1	2	18	
Have you participated in fair housing training?	13	2	1	2	18	
Are you aware of any fair housing testing?	9	5	2	2	18	
Testing and education	Too Little	Right Amount	Too Much	Don't Know	Missing	Total
Is there sufficient outreach and education activity?	5	6	1	4	2	18
Is there sufficient testing?	2	1	3	10	2	18

Table 21.G.5
Protected Classes
 21. Lake County

2012–2013 Fair Housing Survey
 for Housing Stakeholders Data

Protected Class	Total
Family Status	9
Religion	7
Gender	9
National Origin	6
Color	3
Sexual Orientation	2
Age	5
Military	3
Disability	4
Ancestry	1
Ethnicity	1
Race	2
Other	5
Total	57

Table 21.G.6
Fair Housing Violation Referrals
 21. Lake County
 2012–2013 Fair Housing Survey for
 Housing Stakeholders Data

Referral	Total
Fair Housing Resource Center	13
OCRC	1
Other	1
Total	15

LOCAL FAIR HOUSING

Table 21.G.7
Local Fair Housing
 21. Lake County

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?	8	5	1	4	18
Are there any specific geographic areas that have fair housing problems?	4	4	6	4	18
Are there any specific groups in that face housing discrimination?	3	5	6	4	18

FAIR HOUSING IN THE PRIVATE SECTOR

Table 21.G.8
Barriers to Fair Housing in the Private Sector
 21. Lake County
 2012–2013 Fair Housing Survey for Housing Stakeholders Data

Question	Yes	No	Don't Know	Missing	Total
Are you aware of any questionable practices or barriers to fair housing choice in:					
The rental housing market?	3	9	4	2	18
The real estate industry?	3	7	6	2	18
The mortgage and home lending industry?	2	8	6	2	18
The housing construction or accessible housing design fields?	1	10	5	2	18
The home insurance industry?	3	8	5	2	18
The home appraisal industry?		9	7	2	18
Any other housing services?	1	10	5	2	18

FAIR HOUSING IN THE PUBLIC SECTOR

Table 21.G.9
Barriers to Fair Housing in the Public Sector
 21. Lake County
 2012–2013 Fair Housing Survey for Housing Stakeholders Data

Question	Yes	No	Don't Know	Missing	Total
Are you aware of any questionable practices or barriers to fair housing choice in:					
Land use policies?	1	9	5	3	18
Zoning laws?	2	7	6	3	18
Occupancy standards or health and safety codes?	1	10	4	3	18
Property tax policies?	1	7	7	3	18
Permitting process?		9	6	3	18
Housing construction standards?	1	8	6	3	18
Neighborhood or community development policies?	1	9	5	3	18
Limited access to government services, such as employment services?	4	8	2	4	18
Public administrative actions or regulations?	2	8	5	3	18

NARRATIVE COMMENTS

Federal, State, and Local Laws

Table 21.G.10
How did you become aware of fair housing laws?

21. Lake County
 2013 Fair Housing Survey Data

Comments:
<p>Attended Fair Housing Commission meetings while working for a different county.</p> <p>In order to acquire a real estate license we must take fair housing at both the state and local level as part of our real estate law course, and then re-take it every three years in order to maintain our license</p> <p>The housing authority works closely with it's local fair housing agency to serve tenants in common</p>

Table 21.G.11
How should fair housing laws be changed?

21. Lake County
 2013 Fair Housing Survey Data

Comments:
<p>More funding needs to be provided for investigation & enforcement of the current laws.</p>

Local Fair Housing**Table 21.G.12****Are there any specific geographic areas that have fair housing problems?**21. Lake County
2013 Fair Housing Survey Data

Comments:
Few people of color located anywhere in the county except for Painesville. The City of Mentor defers all of their CDBG funds to Western Reserve Community Development. The net effect is the restriction of providing basic Life Safety funds to repair Mentor Seniors and Disabled homes.

Table 21.G.13**Are there any specific groups in that face housing discrimination?**21. Lake County
2013 Fair Housing Survey Data

Comments:
The elderly and disabled.

Table 21.G.14**Please share any additional comments.**21. Lake County
2013 Fair Housing Survey Data

Comments:
There needs to be more effort assisting Condo homeowners in the resolution of their complaints against Condo associations.

Fair Housing in the Private Sector**Table 21.G.15****Are you aware of any questionable practices or barriers to fair housing choice in the real estate industry?**21. Lake County
2013 Fair Housing Survey Data

Comments:
Mental disabilities were the basis of eviction of a Senior from her home.

Table 21.G.16**Are you aware of any questionable practices or barriers to fair housing choice in the mortgage and home lending industry?**21. Lake County
2013 Fair Housing Survey Data

Comments:
HUD regulation prohibit home improvement grants & loans to persons living in mobile homes in mobile home parks.

Table 21.G.17**Are you aware of any questionable practices or barriers to fair housing choice in the home insurance industry?**21. Lake County
2013 Fair Housing Survey Data

Comments:
Insurance companies drop Seniors' homeowner's insurance policies prior to the completion of HUD assistance application & construction process.

Table 21.G.18**Are you aware of any questionable practices or barriers to fair housing choice in property tax policies?**21. Lake County
2013 Fair Housing Survey Data

Comments:

No Lake County community is currently providing tax incentives to plan or construct the amount of required Universal Design housing that will be required for the vast increase that baby boomers will need within ten years.

Table 21.G.19

Are you aware of any questionable practices or barriers to fair housing choice in housing construction standards?

21. Lake County
2013 Fair Housing Survey Data

Comments:
Lake County Building Department has a track record of being counterproductive in their interaction with the building and design communities. Assistance in understanding guidelines are blocked because of this department's adversarial leadership

Table 21.G.20

Are you aware of any barriers that limit access to government services, such as a lack of transportation or employment services?

21. Lake County
2013 Fair Housing Survey Data

Comments:
lack of affordable public transportation Public education of the availability of HUD assistance programs is not being funded or done.

Table 21.G.21

Are you aware of any questionable practices or barriers to fair housing choice in any other public administrative actions or regulations?

21. Lake County
2013 Fair Housing Survey Data

Comments:
Lake County Building Department is required to lead Fair Housing policies but are blocked because of this department's adversarial leadership

H. LAND USE PLANNING SURVEY DATA

This section contains data regarding the potential effects of local land use and housing policies on fair housing choice, as gathered from the Fair Housing Survey for Government Officials.

FAIR HOUSING SURVEY FOR GOVERNMENT OFFICIALS

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 was conducted predominately online. Respondents were solicited by mass-distributed emails sent by the NEOSCC, members of the Progress Review Team, and other various organizations in the 12-county region.

This section contains data gathered from the public sector staff in the Lake County that received and completed the survey.⁸⁸

⁸⁸ For areas with both nonentitlement and entitlement communities, the results of the nonentitlement community government official survey and the entitlement community interviews were summed.

Table 21.H.1
Housing Development
 21. Lake County
 2012 Fair Housing Survey for Government Officials Data

Question: Does your jurisdiction have...	Yes	No	Don't Know	Missing	Total
Housing Development					
Definitions for "dwelling unit" or "residential unit"?	8	0	1	5	14
Guidelines that encourage development affordable housing units?	0	7	2	5	14
Any potential barriers to the development of low- to moderate- income housing?		7	1	6	14
Guidelines that allow the development of mixed use housing?	7	1	1	5	14
Any potential barriers to the development of mixed use housing?	2	6	1	5	14
Occupancy Standards					
A definition for the term "family"?	4	4	1	5	14
Residential occupancy standards or limits?	4	3	2	5	14
Special Needs Housing					
A definition for the term "disability"?	2	3	2	7	14
Development standards for making housing accessible to persons with disabilities?	1	1	4	8	14
A process by which persons with disabilities can request modification to the jurisdiction's policies?	0	3	4	7	14
Standards for the development of senior housing?	0	4	2	8	14
Guidelines that distinguish senior citizen housing from other residential uses?	4	2	1	7	14
Guidelines for developing housing for any other special needs populations?	2	4	1	7	14
Fair Housing Policies					
A fair housing ordinance, policy, or regulation?	2	2	2	8	14
Policies or practices for "affirmatively furthering fair housing"?	1	3	2	8	14

I. IMPEDIMENTS

The 2013 Northeast Ohio Regional Analysis of Impediments to Fair Housing Choice uncovered several potential issues regarding fair housing in the Lake County. Identification of these items as probable impediments to fair housing choice was based on HUD's definition of impediments as actions, omissions, or decisions that restrict housing choice due to protected class status or actions, omissions, or decisions that have this effect. The identified impediments are supported by evidence uncovered during the Regional AI process, with impediments of higher need being those identified in multiple sources.

These probable impediments in the entirety of the Northeast Ohio Region are presented in **Volumes I** and **II** of the Regional AI. They are accompanied by suggested actions that jurisdictions in the Region may implement in order to alleviate or eliminate these impediments, and are accompanied by measurable objectives. The goal of these actions and measurable objectives is to assist these agencies in offering greater housing choice for all citizens of the Northeast Ohio Region.

The following list presents the private and public sector impediments found in the Lake County.

PRIVATE SECTOR

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

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

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

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

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

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

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

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

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

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

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

Suggestion: Additional training for landlords and property managers.

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

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

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

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

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

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

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

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

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

8. *Impediment: Denial of home purchase loans*

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

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

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

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

Suggestion: Utilize resources for first-time and lower-income homebuyers that belong to race, ethnic, and gender protected classes so that they can improve their credit 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 in Lake County.

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, including Lake County.

Suggestion: Construct a regional 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 in Lake County. 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 other local units of government as co-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 in Lake County. 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:* 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 was evident in Lake County as well. This impediment was identified through review of the results of the Fair Housing Survey for Government Officials.

Suggestion: Construct a regional 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.

5. *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 and exists in Lake County.

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.

IMPEDIMENTS MATRIX

The matrix on the following page includes the impediment, data source, or sources that indicated its existence, protected classes most affected, and ranking of need for action. Level of need for action was determined based on the number of data sources that identified each impediment.

Table 21.I.1
Impediments Matrix
 21. Lake County
 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 ⁸⁹		
Private Sector												
1	Denial of available housing units in the rental markets		X				X	X			Black and Hispanic persons	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			Black and Hispanic persons	M
10	Failure to comply with accessibility requirements in construction of housing units							X			Disabled persons	L
Public Sector												
1	Lack of sufficient fair housing policies or practices by several units of local government							X			All	L
2	Lack of sufficient fair housing outreach and education efforts							X	X	X	All	H
3	Land use and planning decisions and operational practices resulting in unequal access to government services such as transportation							X		X	All	M
4	Decisions regarding definitions of "family," "dwelling unit," and related terms									X	Disabled persons, families	L
5	Lack of inclusionary policies							X		X	All	M

⁸⁹ 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.

22. CITY OF MENTOR

A. CENSUS BUREAU DATA

This section contains additional data from the U.S. Census Bureau.

Table 22.A.1

Population by Age

22. City of Mentor

2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Under 5	3,026	6.0%	2,183	4.6%	-27.9%
5 to 19	11,138	22.2%	8,817	18.7%	-20.8%
20 to 24	2,140	4.3%	2,216	4.7%	3.6%
25 to 34	5,595	11.1%	4,537	9.6%	-18.9%
35 to 54	17,241	34.3%	14,331	30.4%	-16.9%
55 to 64	4,969	9.9%	7,287	15.5%	46.6%
65 or Older	6,169	12.3%	7,788	16.5%	26.2%
Total	50,278	100.0%	47,159	100.0%	-6.2%

Table 22.A.2

Elderly Population by Age

22. City of Mentor

2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
65 to 66	707	11.5%	959	12.3%	35.6%
67 to 69	1,049	17.0%	1,522	19.5%	45.1%
70 to 74	1,585	25.7%	1,722	22.1%	8.6%
75 to 79	1,379	22.4%	1,367	17.6%	-.9%
80 to 84	857	13.9%	1,094	14.0%	27.7%
85 or Older	592	9.6%	1,124	14.4%	89.9%
Total	6,169	100.0%	7,788	100.0%	26.2%

Table 22.A.3

Population by Race and Ethnicity

22. City of Mentor

2000 & 2010 Census SF1 Data

Race	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
White	48,920	97.3%	45,404	96.3%	-7.2%
Black	324	.6%	454	1.0%	40.1%
American Indian	24	.0%	37	.1%	54.2%
Asian	597	1.2%	646	1.4%	8.2%
Native Hawaiian/ Pacific Islander	16	.0%	6	.0%	-62.5%
Other	91	.2%	145	.3%	59.3%
Two or More Races	306	.6%	467	1.0%	52.6%
Total	50,278	100.0%	47,159	100.0%	-6.2%
Non-Hispanic	49,915	99.3	46,535	98.7%	-6.8%
Hispanic	363	.7%	624	1.3%	71.9%

Table 22.A.4
Disability by Age
 22. City of Mentor
 2010 Three-Year ACS Data

Age	Male		Female		Total	
	Disabled Population	Disability Rate	Disabled Population	Disability Rate	Disabled Population	Disability Rate
Under 5	0	.0%	0	.0%	0	.0%
5 to 17	217	5.6%	117	3.0%	334	4.3%
18 to 34	227	6.2%	287	6.8%	514	6.5%
35 to 64	1,387	13.2%	1,082	9.7%	2,469	11.4%
65 to 74	426	24.0%	520	24.5%	946	24.2%
75 or Older	627	43.6%	971	46.8%	1,598	45.5%
Total	2,884	12.7%	2,977	12.0%	5,861	12.4%

Table 22.A.5
Employment Status by Disability and Type: Age 18 to 64
 22. City of Mentor
 2010 Three-Year ACS Data

Disability Status	Population
Employed:	22,629
With a disability:	1,199
With a hearing difficulty	333
With a vision difficulty	239
With a cognitive difficulty	392
With an ambulatory difficulty	565
With a self-care difficulty	174
With an independent living difficulty	252
No disability	21,430
Unemployed:	1,685
With a disability:	229
With a hearing difficulty	89
With a vision difficulty	0
With a cognitive difficulty	63
With an ambulatory difficulty	123
With a self-care difficulty	39
With an independent living difficulty	39
No disability	1,456
Not in labor force:	5,333
With a disability:	1,555
With a hearing difficulty	86
With a vision difficulty	144
With a cognitive difficulty	913
With an ambulatory difficulty	1,086
With a self-care difficulty	627
With an independent living difficulty	940
No disability	3,778
Total	29,647

Table 22.A.6
Households by Income

22. City of Mentor
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	1,116	5.9%	1,095	5.8%
\$15,000 to \$19,999	625	3.3%	524	2.8%
\$20,000 to \$24,999	1,003	5.3%	707	3.8%
\$25,000 to \$34,999	1,896	10.1%	1,678	8.9%
\$35,000 to \$49,999	3,225	17.2%	2,786	14.8%
\$50,000 to \$74,999	4,563	24.3%	4,352	23.1%
\$75,000 to \$99,999	3,320	17.7%	3,175	16.9%
\$100,000 or More	3,010	16.0%	4,489	23.9%
Total	18,758	100.0%	18,806	100.0%

Table 22.A.7
Poverty by Age

22. City of Mentor
2000 Census SF3 & 2010 Five-Year ACS Data

Age	2000 Census		2010 Five-Year ACS	
	Persons in Poverty	% of Total	Persons in Poverty	% of Total
Under 6	122	8.9%	385	15.2%
6 to 17	285	20.9%	617	24.3%
18 to 64	703	51.5%	1,316	51.9%
65 or Older	256	18.7%	217	8.6%
Total	1,366	100.0%	2,535	100.0%
Poverty Rate	2.7%	.	5.4%	.

Table 22.A.8
Households by Year Home Built

22. City of Mentor
2000 Census SF3 & 2010 Five-Year ACS Data

Year Built	2000 Census		2010 Five-Year ACS	
	Households	% of Total	Households	% of Total
1939 or Earlier	1,106	5.9%	823	4.4%
1940 to 1949	786	4.2%	787	4.2%
1950 to 1959	3,092	16.4%	3,018	16.0%
1960 to 1969	3,796	20.2%	3,846	20.5%
1970 to 1979	3,997	21.3%	4,136	22.0%
1980 to 1989	3,456	18.4%	3,067	16.3%
1990 to 1999	2,564	13.6%	2,518	13.4%
2000 to 2004	.	.	486	2.6%
2005 or Later	.	.	125	.7%
Total	18,797	100.0%	18,806	100.0%

Table 22.A.9
Housing Units by Type

22. City of Mentor
2000 Census SF3 & 2010 Five-Year ACS Data

Unit Type	2000 Census		2010 Five-Year ACS	
	Units	% of Total	Units	% of Total
Single-Family	16,783	87.0%	17,202	87.4%
Duplex	112	.6%	65	.3%
Tri- or Four-Plex	513	2.7%	510	2.6%
Apartment	1,538	8.0%	1,627	8.3%
Mobile Home	355	1.8%	285	1.4%
Boat, RV, Van, Etc.	0	.0%	0	.0%
Total	19,301	100.0%	19,689	100.0%

Table 22.A.10
Housing Units by Tenure

22. City of Mentor
2000 & 2010 Census SF1 Data

Tenure	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
Occupied Housing Units	18,797	97.4%	19,166	94.8%	2.0%
Owner-Occupied	16,438	87.5%	16,389	85.5%	-.3%
Renter-Occupied	2,359	12.5%	2,777	14.5%	17.7%
Vacant Housing Units	504	2.6%	1,052	5.2%	108.7%
Total Housing Units	19,301	100.0%	20,218	100.0%	4.8%

Table 22.A.11
Disposition of Vacant Housing Units

22. City of Mentor
2000 & 2010 Census SF1 Data

Disposition	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
For Rent	141	28.0%	351	33.4%	148.9%
For Sale	150	29.8%	260	24.7%	73.3%
Rented or Sold, Not Occupied	55	10.9%	54	5.1%	-1.8%
For Seasonal, Recreational, or Occasional Use	72	14.3%	107	10.2%	48.6%
For Migrant Workers	0	0.0%	0	.0%	%
Other Vacant	86	17.1%	280	26.6%	225.6%
Total	504	100.0%	1,052	100.0%	108.7%

Table 22.A.12
Households by Household Size

22. City of Mentor
2000 & 2010 Census SF1 Data

Size	2000 Census		2010 Census		% Change 00-10
	Households	% of Total	Households	% of Total	
One Person	3,861	20.5%	4,930	25.7%	27.7%
Two Persons	6,466	34.4%	7,031	36.7%	8.7%
Three Persons	3,373	17.9%	3,168	16.5%	-6.1%
Four Persons	3,257	17.3%	2,540	13.3%	-22.0%
Five Persons	1,362	7.2%	1,064	5.6%	-21.9%
Six Persons	358	1.9%	310	1.6%	-13.4%
Seven Persons or More	120	.6%	123	.6%	2.5%
Total	18,797	100.0%	19,166	100.0%	2.0%

Table 22.A.13
Household Type by Tenure
 22. City of Mentor
 2000 & 2010 Census SF1 Data

Household Type	2000 Census		2010 Census		% Change 00–10
	Households	% of Total	Households	% of Total	
Family Households	14,235	75.7%	13,339	69.6%	-6.3%
Married-Couple Family	11,957	84.0%	10,803	81.0%	-9.7%
Owner-Occupied	11,201	93.7%	10,161	94.1%	-9.3%
Renter-Occupied	756	6.3%	642	5.9%	-15.1%
Other Family	2,278	16.0%	2,536	19.0%	11.3%
Male Householder, No Spouse	600	26.3%	728	28.7%	21.3%
Owner-Occupied	454	75.7%	548	75.3%	20.7%
Renter-Occupied	146	24.3%	180	24.7%	23.3%
Female Householder, No Spouse	1,678	73.7%	1,808	71.3%	7.7%
Owner-Occupied	1,261	75.1%	1,296	71.7%	2.8%
Renter-Occupied	417	24.9%	512	28.3%	22.8%
Non-Family Households	4,562	24.3%	5,827	30.4%	27.7%
Owner-Occupied	3,522	77.2%	4,384	75.2%	24.5%
Renter-Occupied	1,040	22.8%	1,443	24.8%	38.8%
Total	18,797	100.0%	19,166	100.0%	2.0%

Table 22.A.14
Group Quarters Population
 22. City of Mentor
 2000 & 2010 Census SF1 Data

Group Quarters Type	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Institutionalized					
Correctional Institutions	4	1.2%	0	.0%	-100.0%
Juvenile Facilities	.	.	0	.0%	.
Nursing Homes	320	98.8%	381	100.0%	19.1%
Other Institutions	0	.0%	0	.0%	%
Total	324	100.0%	381	100.0%	17.6%
Noninstitutionalized					
College Dormitories	0	.0%	0	.0%	%
Military Quarters	0	.0%	0	.0%	%
Other Noninstitutional	152	100.0%	22	100.0%	-85.5%
Total	152	31.9%	22	5.5%	-85.5%
Total Group Quarters Population	476	100.0%	403	100.0%	-15.3%

Table 22.A.15
Overcrowding and Severe Overcrowding
 22. City of Mentor
 2000 Census SF3 & 2010 Five-Year ACS Data

Data Source	No Overcrowding		Overcrowding		Severe Overcrowding		Total
	Households	% of Total	Households	% of Total	Households	% of Total	
Owner							
2000 Census	16,390	99.7%	39	.2%	7	.0%	16,436
2010 ACS	16,337	99.9%	11	.1%	0	.0%	16,348
Renter							
2000 Census	2,291	97.0%	42	1.8%	28	1.2%	2,361
2010 ACS	2,420	98.5%	38	1.5%	0	.0%	2,458
Total							
2000 Census	18,681	99.4%	81	.4%	35	.2%	18,797
2010 ACS	18,757	99.7%	49	.3%	0	.0%	18,806

Table 22.A.16
Households with Incomplete Plumbing Facilities
 22. City of Mentor
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Plumbing Facilities	18,758	18,735
Lacking Complete Plumbing Facilities	39	71
Total Households	18,797	18,806
Percent Lacking	.2%	.4%

Table 22.A.17
Households with Incomplete Kitchen Facilities
 22. City of Mentor
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Kitchen Facilities	18,728	18,687
Lacking Complete Kitchen Facilities	69	119
Total Households	18,797	18,806
Percent Lacking	.4%	.6%

Table 22.A.18
Cost Burden and Severe Cost Burden by Tenure
 22. City of Mentor
 2000 Census & 2010 Five-Year ACS Data

Data Source	Less Than 30%		31%-50%		Above 50%		Not Computed		Total
	Households	% of Total	Households	% of Total	Households	% of Total	Households	% of Total	
Owner With a Mortgage									
2000 Census	8,871	76.0%	1,934	16.6%	801	6.9%	60	.5%	11,666
2010 ACS	8,821	71.5%	2,482	20.1%	1,031	8.4%	0	.0%	12,334
Owner Without a Mortgage									
2000 Census	3,148	91.3%	163	4.7%	109	3.2%	29	.8%	3,449
2010 ACS	3,422	85.3%	276	6.9%	316	7.9%	0	.0%	4,014
Renter									
2000 Census	1,520	64.6%	423	18.0%	294	12.5%	115	4.9%	2,352
2010 ACS	1,207	49.1%	507	20.6%	659	26.8%	85	3.5%	2,458
Total									
2000 Census	13,539	77.5%	2,520	14.4%	1,204	6.9%	204	1.2%	17,467
2010 ACS	13,450	71.5%	3,265	17.4%	2,006	10.7%	85	.5%	18,806

Table 22.A.19
Median Housing Costs
 22. City of Mentor
 2000 Census SF3 & 2010 Five-Year ACS Data

Housing Cost	2000 Census	2010 ACS
Median Contract Rent	\$614	\$709
Median Home Value	\$147,400	\$172,600

B. BLS DATA

This section contains Bureau of Labor Statistics (BLS) data that address employment and income.

Table 22.B.1
Labor Force Statistics
 22. City of Mentor
 1990–2011 BLS Data

Year	Labor Force	Employment	Unemployment	Unemployment Rate	Statewide Unemployment Rate
1990	26,336	25,114	1,222	4.6%	5.7%
1991	26,001	24,567	1,434	5.5%	6.6%
1992	26,522	24,756	1,766	6.7%	7.4%
1993	27,024	25,307	1,717	6.4%	6.7%
1994	27,402	25,912	1,490	5.4%	5.6%
1995	27,386	26,257	1,129	4.1%	4.9%
1996	27,754	26,769	985	3.5%	5.0%
1997	28,216	27,305	911	3.2%	4.6%
1998	29,011	28,162	849	2.9%	4.3%
1999	29,504	28,575	929	3.1%	4.3%
2000	29,581	28,787	794	2.7%	4.0%
2001	29,876	28,920	956	3.2%	4.4%
2002	29,908	28,711	1,197	4.0%	5.7%
2003	30,164	28,684	1,480	4.9%	6.2%
2004	30,081	28,669	1,412	4.7%	6.1%
2005	30,144	28,773	1,371	4.5%	5.9%
2006	30,416	29,105	1,311	4.3%	5.4%
2007	30,904	29,452	1,452	4.7%	5.6%
2008	31,014	29,372	1,642	5.3%	6.5%
2009	30,521	28,287	2,234	7.3%	10.1%
2010	27,942	25,856	2,086	7.5%	10.0%
2011	27,983	26,198	1,785	6.4%	8.6%

C. HMDA DATA

The Home Mortgage Disclosure Act (HMDA) requires both depository and non-depository lenders to collect and publicly disclose information about housing-related loans and loan applications.⁹⁰ The information presented in this section presents detailed HMDA data, including denial rates and predatory lending including high annual percentage rate (APR) loans.

Table 22.C.1
Purpose of Loan by Year
22. City of Mentor
2004–2011 HMDA Data

Purpose	2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	1,550	1,783	1,602	1,232	833	888	714	737	9,339
Home Improvement	290	412	347	266	187	130	86	88	1,806
Refinancing	2,964	2,966	2,661	1,814	1,299	2,118	2,084	1,713	17,619
Total	4,804	5,161	4,610	3,312	2,319	3,136	2,884	2,538	28,764

Table 22.C.2
Occupancy Status for Home Purchase Loan Applications
22. City of Mentor
2004–2011 HMDA Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	Total
Owner-Occupied	1,455	1,679	1,482	1,135	789	851	689	699	8,779
Not Owner-Occupied	82	97	118	94	43	37	23	38	532
Not Applicable	13	7	2	3	1	0	2	0	28
Total	1,550	1,783	1,602	1,232	833	888	714	737	9,339

Table 22.C.3
Owner-Occupied Home Purchase Loan Applications by Loan Type
22. City of Mentor
2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Conventional	1,302	1,527	1,365	1,001	461	388	305	330	6,679
FHA - Insured	131	137	101	100	293	421	356	320	1,859
VA - Guaranteed	22	15	16	34	35	42	28	49	241
Rural Housing Service or Farm Service Agency	0	0	0	0	0	0	0	0	0
Total	1,455	1,679	1,482	1,135	789	851	689	699	8,779

⁹⁰ Data are considered “raw” because they contain entry errors and incomplete loan applications. Starting in 2004, the HMDA data made substantive changes in reporting. It modified the way it handled Hispanic data, loan interest rates, and the reporting of multifamily loan applications.

DENIAL RATES

Table 22.C.4
Loan Applications by Action Taken
 22. City of Mentor
 2004–2011 HMDA Data

Action	2004	2005	2006	2007	2008	2009	2010	2011	Total
Loan Originated	926	1,018	852	652	462	443	382	400	5,135
Application Approved but not Accepted	67	65	77	48	23	20	19	16	335
Application Denied	117	126	104	70	50	46	41	42	596
Application Withdrawn by Applicant	82	103	79	43	41	31	33	29	441
File Closed for Incompleteness	19	23	19	10	8	8	6	5	98
Loan Purchased by the Institution	244	340	351	309	204	303	208	207	2,166
Preapproval Request Denied	0	4	0	3	1	0	0	0	8
Preapproval Approved but not Accepted	0	0	0	0	0	0	0	0	0
Total	1,455	1,679	1,482	1,135	789	851	689	699	8,779
Denial Rate	11.2%	11.0%	10.9%	9.7%	9.8%	9.4%	9.7%	9.5%	10.4%

Table 22.C.5
Denial Rates by Gender of Applicant
 22. City of Mentor
 2004–2011 HMDA Data

Year	Male	Female	Not Available	Not Applicable	Average
2004	9.9%	11.8%	42.9%	%	11.2%
2005	8.8%	13.1%	39.3%	%	11.0%
2006	8.4%	13.3%	31.6%	%	10.9%
2007	8.0%	11.0%	30.8%	%	9.7%
2008	9.5%	10.7%	6.3%	%	9.8%
2009	8.0%	11.6%	16.7%	%	9.4%
2010	6.5%	13.4%	29.4%	.0%	9.7%
2011	10.8%	6.3%	16.7%	%	9.5%
Average	8.8%	11.8%	29.0%	.0%	10.4%

Table 22.C.6
Loan Applications by Selected Action Taken by Gender of Applicant
 22. City of Mentor
 2004–2011 HMDA Data

Gender		2004	2005	2006	2007	2008	2009	2010	2011	Total
Male	Originated	616	662	559	439	305	298	246	257	3,382
	Denied	68	64	51	38	32	26	17	31	327
	Denial Rate	9.9%	8.8%	8.4%	8.0%	9.5%	8.0%	6.5%	10.8%	8.8%
Female	Originated	298	339	267	195	142	130	123	133	1,627
	Denied	40	51	41	24	17	17	19	9	218
	Denial Rate	11.8%	13.1%	13.3%	11.0%	10.7%	11.6%	13.4%	6.3%	11.8%
Not Available	Originated	12	17	26	18	15	15	12	10	125
	Denied	9	11	12	8	1	3	5	2	51
	Denial Rate	42.9%	39.3%	31.6%	30.8%	6.3%	16.7%	29.4%	16.7%	29.0%
Not Applicable	Originated	0	0	0	0	0	0	1	0	1
	Denied	0	0	0	0	0	0	0	0	0
	Denial Rate	%	%	%	%	%	%	.0%	%	.0%
Total	Originated	926	1,018	852	652	462	443	382	400	5,135
	Denied	117	126	104	70	50	46	41	42	596
	Denial Rate	11.2%	11.0%	10.9%	9.7%	9.8%	9.4%	9.7%	9.5%	10.4%

Table 22.C.7
Denial Rates by Race/Ethnicity of Applicant
 22. City of Mentor
 2004–2011 HMDA Data

Race/Ethnicity	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	.0%	%	%	.0%	%	%	%	100.0%	40.0%
Asian	15.0%	.0%	.0%	18.2%	11.1%	.0%	100.0%	.0%	11.7%
Black	14.3%	22.2%	14.3%	37.5%	.0%	.0%	%	20.0%	18.8%
White	9.8%	10.1%	10.0%	8.5%	9.4%	8.8%	8.6%	8.6%	9.4%
Not Available	35.2%	23.7%	24.6%	22.5%	15.6%	18.2%	23.1%	16.0%	23.6%
Not Applicable	.0%	%	%	%	%	0%	0.0%	%	.0%
Average	11.2%	11.0%	10.9%	9.7%	9.8%	9.4%	9.7%	9.5%	10.4%
Non-Hispanic	10.2%	10.0%	9.6%	8.9%	9.8%	8.5%	7.9%	9.6%	9.5%
Hispanic	11.1%	18.2%	20.0%	16.7%	.0%	33.3%	75.0%	.0%	18.5%

Table 22.C.8
Loan Applications by Selected Action Taken by Race/Ethnicity of Applicant
 22. City of Mentor
 2004–2011 HMDA Data

Race		2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Originated	2	0	0	1	0	0	0	0	3
	Denied	0	0	0	0	0	0	0	2	2
	Denial Rate	.0%	%	%	.0%	%	%	%	100.0%	40.0%
Asian	Originated	17	7	7	9	8	1	0	4	53
	Denied	3	0	0	2	1	0	1	0	7
	Denial Rate	15.0%	.0%	.0%	18.2%	11.1%	.0%	100.0%	.0%	11.7%
Black	Originated	12	7	6	5	2	3	0	4	39
	Denied	2	2	1	3	0	0	0	1	9
	Denial Rate	14.3%	22.2%	14.3%	37.5%	.0%	.0%	%	20.0%	18.8%
White	Originated	859	946	793	606	425	412	361	371	4,773
	Denied	93	106	88	56	44	40	34	35	496
	Denial Rate	9.8%	10.1%	10.0%	8.5%	9.4%	8.8%	8.6%	8.6%	9.4%
Not Available	Originated	35	58	46	31	27	27	20	21	265
	Denied	19	18	15	9	5	6	6	4	82
	Denial Rate	35.2%	23.7%	24.6%	22.5%	15.6%	18.2%	23.1%	16.0%	23.6%
Not Applicable	Originated	1	0	0	0	0	0	1	0	2
	Denied	0	0	0	0	0	0	0	0	0
	Denial Rate	35.2%	23.7%	24.6%	22.5%	15.6%	18.2%	23.1%	16.0%	.0%
Total	Originated	926	1,018	852	652	462	443	382	400	5,135
	Denied	117	126	104	70	50	46	41	42	596
	Denial Rate	11.2%	11.0%	10.9%	9.7%	9.8%	9.4%	9.7%	9.5%	10.4%
Non-Hispanic	Originated	811	941	792	614	424	419	361	378	4,740
	Denied	92	105	84	60	46	39	31	40	497
	Denial Rate	10.2%	10.0%	9.6%	8.9%	9.8%	8.5%	7.9%	9.6%	9.5%
Hispanic	Originated	8	9	8	5	8	2	1	3	44
	Denied	1	2	2	1	0	1	3	0	10
	Denial Rate	11.1%	18.2%	20.0%	16.7%	.0%	33.3%	75.0%	.0%	18.5%

Table 22.C.9
Loan Applications by Reason for Denial
 22. City of Mentor
 2004–2011 HMDA Data

Denial Reason	2004	2005	2006	2007	2008	2009	2010	2011	Total
Debt-to-Income Ratio	21	21	17	14	4	8	12	13	110
Employment History	0	3	0	2	2	2	0	0	9
Credit History	24	17	15	8	11	7	10	4	96
Collateral	5	13	5	6	11	14	7	5	66
Insufficient Cash	1	1	3	1	0	0	1	0	7
Unverifiable Information	6	7	3	3	3	1	1	1	25
Credit Application Incomplete	12	8	8	10	5	1	6	8	58
Mortgage Insurance Denied	0	0	0	1	0	1	0	0	2
Other	17	35	20	12	7	3	2	3	99
Missing	31	21	33	13	7	9	2	8	124
Total	117	126	104	70	50	46	41	42	596

Table 22.C.10
Denial Rates by Income of Applicant
 22. City of Mentor
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	33.3%	100.0%	.0%	50.0%	%	.0%	%	50.0%	41.7%
\$15,001–\$30,000	18.2%	19.0%	18.8%	13.3%	14.7%	16.7%	18.4%	12.0%	16.9%
\$30,001–\$45,000	14.7%	8.2%	14.5%	11.4%	11.0%	12.6%	15.0%	12.9%	12.2%
\$45,001–\$60,000	12.1%	13.5%	10.3%	14.4%	12.1%	10.1%	8.4%	3.4%	11.2%
\$60,001–\$75,000	10.3%	11.4%	14.1%	9.6%	10.1%	3.3%	8.5%	9.1%	10.5%
Above \$75,000	4.2%	8.0%	6.8%	5.3%	6.7%	5.3%	3.4%	9.9%	6.3%
Data Missing	14.0%	19.4%	4.2%	7.7%	.0%	37.5%	.0%	.0%	12.0%
Total	11.2%	11.0%	10.9%	9.7%	9.8%	9.4%	9.7%	9.5%	10.4%

Table 22.C.11
Denial Rates of Loans by Race/Ethnicity and Income of Applicant
 22. City of Mentor
 2004–2011 HMDA Data

Race	<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	Above \$75K	Data Missing	Average
American Indian	%	100.0%	.0%	%	%	.0%	%	40.0%
Asian	.0%	14.3%	16.7%	.0%	20.0%	13.0%	.0%	11.7%
Black	%	100.0%	28.6%	26.7%	.0%	10.5%	%	18.8%
White	37.5%	15.2%	11.4%	10.4%	9.4%	5.9%	6.3%	9.4%
Not Available	66.7%	31.4%	22.6%	23.3%	27.5%	11.2%	68.8%	23.6%
Not Applicable	%	%	%	%	%	.0%	.0%	.0%
Average	41.7%	16.9%	12.2%	11.2%	10.5%	6.3%	12.0%	10.4%
Non-Hispanic Ethnicity	33.3%	15.7%	11.5%	10.1%	9.2%	6.2%	7.2%	9.5%
Hispanic (Ethnicity)	%	.0%	17.6%	33.3%	28.6%	9.1%	.0%	18.5%

Table 22.C.12
Loan Applications by Reason for Denial by Race/Ethnicity of Applicant
 22. City of Mentor
 2004–2011 HMDA Data

Denial Reason	American Indian	Asian	Black	White	Not Available	Not Applicable	Total	Hispanic (Ethnicity)
Debt-to-Income Ratio	1	1	1	92	15	0	110	2
Employment History	0	0	0	9	0	0	9	0
Credit History	0	2	0	86	8	0	96	2
Collateral	0	1	0	55	10	0	66	2
Insufficient Cash	0	0	0	7	0	0	7	0
Unverifiable Information	0	1	2	22	0	0	25	0
Credit Application Incomplete	0	0	1	47	10	0	58	0
Mortgage Insurance Denied	0	0	0	2	0	0	2	0
Other	0	1	2	83	13	0	99	2
Missing	1	1	3	93	26	0	124	2
Total	2	7	9	496	82	0	596	10
% Missing	50.0%	14.3%	33.3%	18.8%	31.7%	%	20.8%	20.0%

Table 22.C.13
Loan Applications by Income of Applicant: Originated and Denied
 22. City of Mentor
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Loan Originated	2	0	1	1	0	2	0	1	7
	Application Denied	1	2	0	1	0	0	0	1	5
	Denial Rate	33.3%	100.0%	.0%	50.0%	%	.0%	%	50.0%	41.7%
\$15,001–\$30,000	Loan Originated	81	68	56	39	29	35	40	44	392
	Application Denied	18	16	13	6	5	7	9	6	80
	Denial Rate	18.2%	19.0%	18.8%	13.3%	14.7%	16.7%	18.4%	12.0%	16.9%
\$30,001–\$45,000	Loan Originated	197	236	148	156	97	111	85	88	1,118
	Application Denied	34	21	25	20	12	16	15	13	156
	Denial Rate	14.7%	8.2%	14.5%	11.4%	11.0%	12.6%	15.0%	12.9%	12.2%
\$45,001–\$60,000	Loan Originated	210	198	175	107	94	89	87	86	1,046
	Application Denied	29	31	20	18	13	10	8	3	132
	Denial Rate	12.1%	13.5%	10.3%	14.4%	12.1%	10.1%	8.4%	3.4%	11.2%
\$60,001–\$75,000	Loan Originated	139	171	140	103	71	59	54	50	787
	Application Denied	16	22	23	11	8	2	5	5	92
	Denial Rate	10.3%	11.4%	14.1%	9.6%	10.1%	3.3%	8.5%	9.1%	10.5%
Above \$75,000	Loan Originated	248	320	286	234	168	142	114	127	1,639
	Application Denied	11	28	21	13	12	8	4	14	111
	Denial Rate	4.2%	8.0%	6.8%	5.3%	6.7%	5.3%	3.4%	9.9%	6.3%
Data Missing	Loan Originated	49	25	46	12	3	5	2	4	146
	Application Denied	8	6	2	1	0	3	0	0	20
	Denial Rate	14.0%	19.4%	4.2%	7.7%	.0%	37.5%	.0%	.0%	12.0%
Total	Loan Originated	926	1,018	852	652	462	443	382	400	5,135
	Application Denied	117	126	104	70	50	46	41	42	596
	Denial Rate	11.2%	11.0%	10.9%	9.7%	9.8%	9.4%	9.7%	9.5%	10.4%

Table 22.C.14
Loan Applications by Income and Race/Ethnicity of Applicant: Originated and Denied
 22. City of Mentor
 2004–2011 HMDA Data

Race		<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	> \$75K	Data Missing	Total
American Indian	Loan Originated	0	0	2	0	0	1	0	3
	Application Denied	0	2	0	0	0	0	0	2
	Denial Rate	%	100.0%	.0%	%	%	.0%	%	40.0%
Asian	Loan Originated	1	6	5	8	8	20	5	53
	Application Denied	0	1	1	0	2	3	0	7
	Denial Rate	.0%	14.3%	16.7%	.0%	20.0%	13.0%	.0%	11.7%
Black	Loan Originated	0	0	5	11	6	17	0	39
	Application Denied	0	1	2	4	0	2	0	9
	Denial Rate	%	100.0%	28.6%	26.7%	.0%	10.5%	%	18.8%
White	Loan Originated	5	362	1,041	981	736	1,513	135	4,773
	Application Denied	3	65	134	114	76	95	9	496
	Denial Rate	37.5%	15.2%	11.4%	10.4%	9.4%	5.9%	6.3%	9.4%
Not Available	Loan Originated	1	24	65	46	37	87	5	265
	Application Denied	2	11	19	14	14	11	11	82
	Denial Rate	66.7%	31.4%	22.6%	23.3%	27.5%	11.2%	68.8%	23.6%
Not Applicable	Loan Originated	0	0	0	0	0	1	1	2
	Application Denied	0	0	0	0	0	0	0	0
	Denial Rate	%	%	%	%	%	.0%	.0%	.0%
Total	Loan Originated	7	392	1,118	1,046	787	1,639	146	5,135
	Application Denied	5	80	156	132	92	111	20	596
	Denial Rate	41.7%	16.9%	12.2%	11.2%	10.5%	6.3%	12.0%	10.4%
Non-Hispanic Ethnicity	Loan Originated	6	364	1,019	974	731	1,517	129	4,740
	Application Denied	3	68	132	110	74	100	10	497
	Denial Rate	33.3%	15.7%	11.5%	10.1%	9.2%	6.2%	7.2%	9.5%
Hispanic (Ethnicity)	Loan Originated	0	2	14	8	5	10	5	44
	Application Denied	0	0	3	4	2	1	0	10
	Denial Rate	%	.0%	17.6%	33.3%	28.6%	9.1%	.0%	18.5%

PREDATORY LENDING

Table 22.C.15
Originated Owner-Occupied Loans by HAL Status
 22. City of Mentor
 2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Other	851	838	718	601	440	420	381	399	4,648
HAL	75	180	134	51	22	23	1	1	487
Total	926	1,018	852	652	462	443	382	400	5,135
Percent HAL	8.1%	17.7%	15.7%	7.8%	4.8%	5.2%	.3%	.3%	9.5%

Table 22.C.16
Loans by Loan Purpose by HAL Status
 22. City of Mentor
 2004–2011 HMDA Data

Loan Purpose		2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	Other	851	838	718	601	440	420	381	399	4,648
	HAL	75	180	134	51	22	23	1	1	487
	Percent HAL	8.1%	17.7%	15.7%	7.8%	4.8%	5.2%	.3%	.3%	9.5%
Home Improvement	Other	84	147	126	90	72	33	34	38	624
	HAL	25	29	33	18	7	7	1	0	120
	Percent HAL	22.9%	16.5%	20.8%	16.7%	8.9%	17.5%	2.9%	.0%	16.1%
Refinancing	Other	1,140	838	678	523	453	962	1,061	880	6,535
	HAL	146	286	267	84	53	35	7	2	880
	Percent HAL	11.4%	25.4%	28.3%	13.8%	10.5%	3.5%	.7%	.2%	11.9%
Total	Other	2,075	1,823	1,522	1,214	965	1,415	1,476	1,317	11,807
	HAL	246	495	434	153	22	23	1	1	1,487
	Percent HAL	10.6%	21.4%	22.2%	11.2%	7.8%	4.4%	.6%	.2%	11.2%

Table 22.C.17
HALs Originated by Race of Borrower
 22. City of Mentor
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	0	0	0	0	0	0	0	0	0
Asian	1	1	0	1	0	0	0	0	3
Black	1	1	4	2	0	1	0	0	9
White	62	152	117	42	22	21	1	1	418
Not Available	11	26	13	6	0	1	0	0	57
Not Applicable	0	0	0	0	0	0	0	0	0
Total	75	180	134	51	22	23	1	1	487
Hispanic (Ethnicity)	0	1	2	0	1	0	0	0	4

Table 22.C.18
Rate of HALs Originated by Race/Ethnicity of Borrower
 22. City of Mentor
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	.0%	%	%	.0%	%	%	%	%	.0%
Asian	5.9%	14.3%	.0%	11.1%	.0%	.0%	%	.0%	5.7%
Black	8.3%	14.3%	66.7%	40.0%	.0%	33.3%	%	.0%	23.1%
White	7.2%	16.1%	14.8%	6.9%	5.2%	5.1%	.3%	.3%	8.8%
Not Available	31.4%	44.8%	28.3%	19.4%	.0%	3.7%	.0%	.0%	21.5%
Not Applicable	.0%	%	%	%	%	%	.0%	%	0%
Average	8.1%	17.7%	15.7%	7.8%	4.8%	5.2%	0.3%	0.3%	9.5%
Non-Hispanic Ethnicity	7.6%	15.7%	14.8%	7.2%	4.7%	5.3%	.3%	.3%	8.8%
Hispanic (Ethnicity)	.0%	11.1%	25.0%	.0%	12.5%	.0%	.0%	.0%	9.1%

Table 22.C.19
Loans by HAL Status by Race/Ethnicity of Borrower
 22. City of Mentor
 2004–2011 HMDA Data

Race	Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Other	2	0	0	1	0	0	0	0	3
	HAL	0	0	0	0	0	0	0	0	0
	Percent HAL	.0%	%	%	.0%	%	%	%	%	.0%
Asian	Other	16	6	7	8	8	1	0	4	50
	HAL	1	1	0	1	0	0	0	0	3
	Percent HAL	5.9%	14.3%	.0%	11.1%	.0%	.0%	%	.0%	5.7%
Black	Other	11	6	2	3	2	2	0	4	30
	HAL	1	1	4	2	0	1	0	0	9
	Percent HAL	8.3%	14.3%	66.7%	40.0%	.0%	33.3%	%	.0%	23.1%
White	Other	797	794	676	564	403	391	360	370	4,355
	HAL	62	152	117	42	22	21	1	1	418
	Percent HAL	7.2%	16.1%	14.8%	6.9%	5.2%	5.1%	0.3%	0.3%	8.8%
Not Available	Other	24	32	33	25	27	26	20	21	208
	HAL	11	26	13	6	0	1	0	0	57
	Percent HAL	31.4%	44.8%	28.3%	19.4%	.0%	3.7%	.0%	.0%	21.5%
Not Applicable	Other	1	0	0	0	0	0	1	1	2
	HAL	0	0	0	0	0	0	0	0	0
	Percent HAL	.0%	%	%	%	%	%	.0%	%	0.0%
Total	Other	851	838	718	601	440	420	381	399	4,648
	HAL	75	180	134	51	22	23	1	1	487
	Percent HAL	8.1%	17.7%	15.7%	7.8%	4.8%	5.2%	.3%	.3%	9.5%
Non-Hispanic Ethnicity	Other	749	793	675	570	404	397	360	377	4,325
	HAL	62	148	117	44	20	22	1	1	415
	Percent HAL	7.6%	15.7%	14.8%	7.2%	4.7%	5.3%	.3%	.3%	8.8%
Hispanic (Ethnicity)	Other	8	8	6	5	7	2	1	3	40
	HAL	0	1	2	0	1	0	0	0	4
	Percent HAL	.0%	11.1%	25.0%	.0%	12.5%	.0%	.0%	.0%	9.1%

Table 22.C.20
Rates of HALs by Income of Borrower
 22. City of Mentor
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Average
\$15,000 or Below	.0%	%	.0%	.0%	%	.0%	%	.0%	.0%
\$15,001–\$30,000	14.8%	17.6%	10.7%	10.3%	10.3%	5.7%	.0%	.0%	9.9%
\$30,001–\$45,000	14.2%	21.6%	18.2%	9.6%	3.1%	8.1%	.0%	.0%	11.9%
\$45,001–\$60,000	5.2%	24.2%	21.1%	7.5%	5.3%	6.7%	.0%	1.2%	11.1%
\$60,001–\$75,000	7.2%	12.9%	13.6%	8.7%	7.0%	1.7%	.0%	.0%	8.4%
Above \$75,000	4.4%	13.1%	11.5%	4.7%	3.6%	3.5%	0.9%	.0%	6.7%
Data Missing	6.1%	20.0%	26.1%	33.3%	.0%	.0%	.0%	.0%	16.4%
Average	8.1%	17.7%	15.7%	7.8%	4.8%	5.2%	.3%	.3%	9.5%

Table 22.C.21
Loans by HAL Status by Income of Borrower
 22. City of Mentor
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Other	2	0	1	1	0	2	0	1	7
	HAL	0	0	0	0	0	0	0	0	0
	Percent HAL	.0%	%	.0%	.0%	%	.0%	%	.0%	.0%
\$15,001–\$30,000	Other	69	56	50	35	26	33	40	44	353
	HAL	12	12	6	4	3	2	0	0	39
	Percent HAL	14.8%	17.6%	10.7%	10.3%	10.3%	5.7%	.0%	.0%	9.9%
\$30,001–\$45,000	Other	169	185	121	141	94	102	85	88	985
	HAL	28	51	27	15	3	9	0	0	133
	Percent HAL	14.2%	21.6%	18.2%	9.6%	3.1%	8.1%	.0%	.0%	11.9%
\$45,001 – \$60,000	Other	199	150	138	99	89	83	87	85	930
	HAL	11	48	37	8	5	6	0	1	116
	Percent HAL	5.2%	24.2%	21.1%	7.5%	5.3%	6.7%	.0%	1.2%	11.1%
\$60,001–\$75,000	Other	129	149	121	94	66	58	54	50	721
	HAL	10	22	19	9	5	1	0	0	66
	Percent HAL	7.2%	12.9%	13.6%	8.7%	7.0%	1.7%	.0%	.0%	8.4%
Above \$75,000	Other	237	278	253	223	162	137	113	127	1,530
	HAL	11	42	33	11	6	5	1	0	109
	Percent HAL	4.4%	13.1%	11.5%	4.7%	3.6%	3.5%	.9%	.0%	6.7%
Data Missing	Other	46	20	34	8	3	5	2	4	122
	HAL	3	5	12	4	0	0	0	0	24
	Percent HAL	6.1%	20.0%	26.1%	33.3%	.0%	.0%	.0%	.0%	16.4%
Total	Other	851	838	718	601	440	420	381	399	4,648
	HAL	75	180	134	51	22	23	1	1	487
	Percent HAL	8.1%	17.7%	15.7%	7.8%	4.8%	5.2%	.3%	.3%	9.5%

D. CRA DATA

Additional data tables related to Community Reinvestment Act (CRA) data are presented in this section.

Table 22.D.1
Small Business Loans Originated: \$100,000 or Less by Tract MFI
 22. City of Mentor
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000			260	697		957
2001			256	801		1,057
2002			330	1,047		1,377
2003			458	1,021		1,479
2004			459	1,079		1,538
2005			543	1,132		1,675
2006			680	1,521		2,201
2007			783	1,615		2,398
2008			556	1,268		1,824
2009			244	592		836
2010			198	533		731
2011			275	662		937
Total	0	0	5,042	11,968	0	17,010
Loan Amount (\$1,000s)						
2000			4,215	10,444		14,659
2001			2,866	9,057		11,923
2002			3,305	13,239		16,544
2003			5,375	13,337		18,712
2004			4,428	14,478		18,906
2005			5,360	14,302		19,662
2006			6,942	18,191		25,133
2007			7,778	18,207		25,985
2008			5,422	15,588		21,010
2009			2,530	9,475		12,005
2010			2,963	9,907		12,870
2011			4,008	11,409		15,417
Total	0	0	55,192	157,634	0	212,826

Table 22.D.2
Small Business Loans Originated: \$100,001 to \$250,000 by Tract MFI
 22. City of Mentor
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000			6	48		54
2001			14	51		65
2002			4	60		64
2003			4	41		45
2004			7	58		65
2005			13	47		60
2006			11	48		59
2007			8	47		55
2008			9	51		60
2009			6	30		36
2010			11	44		55
2011			8	53		61
Total	0	0	101	578	0	679
Loan Amount (\$1,000s)						
2000			1,000	9,282		10,282
2001			2,623	9,418		12,041
2002			665	11,104		11,769
2003			580	8,426		9,006
2004			1,099	10,583		11,682
2005			2,456	8,424		10,880
2006			1,857	8,653		10,510
2007			1,351	8,997		10,348
2008			1,241	9,435		10,676
2009			817	5,292		6,109
2010			1,741	8,017		9,758
2011			1,346	9,781		11,127
Total	0	0	16,776	107,412	0	124,188

Table 22.D.3
Small Business Loans Originated: More than \$250,000 by Tract MFI
 22. City of Mentor
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000			7	47		54
2001			6	60		66
2002			14	75		89
2003			15	63		78
2004			12	87		99
2005			11	71		82
2006			4	70		74
2007			5	67		72
2008			4	41		45
2009			2	54		56
2010			17	53		70
2011			12	72		84
Total	0	0	109	760	0	869
Loan Amount (\$1,000s)						
2000			3,712	22,560		26,272
2001			2,680	30,414		33,094
2002			6,913	37,142		44,055
2003			8,345	32,851		41,196
2004			7,531	47,341		54,872
2005			5,671	36,688		42,359
2006			1,939	41,176		43,115
2007			3,008	33,622		36,630
2008			1,958	23,371		25,329
2009			800	31,755		32,555
2010			8,831	29,648		38,479
2011			4,998	40,881		45,879
Total	0	0	56,386	407,449	0	463,835

Table 22.D.4
Small Business Loans to Businesses with Gross Annual Revenues of Less Than \$1 Million by Tract MFI
 22. City of Mentor
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000			136	297		433
2001			122	347		469
2002			117	331		448
2003			168	361		529
2004			140	379		519
2005			279	514		793
2006			272	515		787
2007			306	519		825
2008			184	353		537
2009			95	189		284
2010			78	201		279
2011			143	252		395
Total	0	0	2,040	4,258	0	6,298
Loan Amount (\$1,000s)						
2000			6,637	15,875		22,512
2001			4,240	17,169		21,409
2002			6,882	21,684		28,566
2003			7,133	19,345		26,478
2004			4,433	17,772		22,205
2005			6,227	21,019		27,246
2006			5,112	17,711		22,823
2007			6,275	12,377		18,652
2008			4,613	12,262		16,875
2009			2,164	6,213		8,377
2010			4,428	8,556		12,984
2011			5,714	9,855		15,569
Total	0	0	63,858	179,838	0	243,696

E. COMPLAINT DATA

This section contains data regarding fair housing complaints, as provided by the U.S. Department of Housing and Urban Development (HUD), the Ohio Civil Rights Commission (OCRC), and the Fair Housing Resource Center (FHRC).

HUD COMPLAINTS

Table 22.E.1
Fair Housing Complaints by Basis
 22. City of Mentor
 2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability	1		3	1	3		3			11
Family Status			1	2		2	1	2		8
Race	1				1		2			4
Total Bases	2		4	3	4	2	6	2		23
Total Complaints	2		3	3	4	2	5	2		21

Table 22.E.2
Fair Housing Complaints by Issue
 22. City of Mentor
 2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Discriminatory refusal to rent	1		2				2			5
Discriminatory advertising, statements, and notices			1		2		2			5
Discriminatory advertisement - rental						2		2		4
Failure to make reasonable accommodation			2				2			4
Discriminatory terms, conditions, privileges, or services and facilities				2			1			3
Discrimination in terms, conditions or privileges relating to rental					2		1			3
Discriminatory acts under Section 818 (coercion, etc.)	1						2			3
Discriminatory refusal to negotiate for rental							1			1
Discrimination in services and facilities relating to rental				1						1
Redlining - insurance					1					1
Otherwise deny or make housing available							1			1
Total Issues	2	0	5	3	5	2	12	2	0	31
Total Complaints	2		3	3	4	2	5	2		21

Table 22.E.3
Fair Housing Complaints by Closure Status
 22. City of Mentor
 2004–2012 HUD Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Administrative Closure					1	1	1			3
Cause (FHAP)			1	2	1	1	1			6
Conciliated / Settled	1		2	1	2		2			8
No Cause	1						1			2
Open								2		2
Total Complaints	2		3	3	4	2	5	2		21

HUD Complaints Found With Cause

Table 22.E.4
Fair Housing Complaints Found With Cause by Basis
 22. City of Mentor
 2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability	1		3	1	3		2			10
Family Status			1	2		1	1			5
Race							1			1
Total Bases	1		4	3	3	1	4			16
Total Complaints	1		3	3	3	1	3			14

Table 22.E.5
Fair Housing Complaints Found With Cause by Issue
 22. City of Mentor
 2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Discriminatory refusal to rent	1		2				2			5
Discriminatory advertising, statements, and notices			1		2		2			5
Discrimination in terms, conditions or privileges relating to rental					2		1			3
Failure to make reasonable accommodation			2				1			3
Discriminatory terms, conditions, privileges, or services and facilities				2						2
Discriminatory advertisement - rental						1				1
Discrimination in services and facilities relating to rental				1						1
Total Issues	1	0	5	3	4	1	6	0	0	20
Total Complaints	1		3	3	3	1	3			14

OHIO CIVIL RIGHTS COMMISSION COMPLAINTS

Table 22.E.6
Fair Housing Complaints by Basis
 22. City of Mentor
 2004–2012 OCRRC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability	2	1	2	1	1			2		9
Family Status			2	4				3		9
Gender			2		1			1		4
National Origin							2			2
Race	2	4				2	2			9
Retaliation								1		1
Total Bases	4	5	6	5	3	0	4	7	0	34
Total Complaints	4	5	4	5	3		4	5		30

Table 22.E.7
Fair Housing Complaints by Issue
 22. City of Mentor
 2004–2012 OCRRC Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Advertising	1							2		3
Exclusion	1			3	1					5
Harassment	1	4								5
Other			3	1	2		4	2		12
Reasonable Accommodation			1	1	1			1		4
Terms and Conditions	2	1		3				3		9
Total Issues	5	5	4	8	4	0	4	8	0	38
Total Complaints	4	5	4	5	3		4	5		30

Table 22.E.8
Fair Housing Complaints by Closure Status
 22. City of Mentor
 2004–2012 OCR Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Administrative Closure				4				1		5
CP Failed to Cooperate							1			1
CP Withdrawal – No Benefit					1					1
No Cause Finding Issued	2							1		3
No Jurisdiction							1			1
Settlement With Benefits			3		2		1	2		8
Successful Conciliation			1							1
Withdrawal With Benefits	2	5		1			1	1		10
Total Complaints	4	5	4	5	3	0	4	5	0	30

FAIR HOUSING RESOURCE CENTER COMPLAINTS

Table 22.E.11
Fair Housing Complaints by Basis
 22. City of Mentor
 2004– 2012 FHRC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability	5	3	2	3		1	4	4	1	23
Family Status	1	3	1	1						6
National Origin	1									1
Race		2					1	2		5
Other		1	3	2	1	1	1		1	10
Total Bases	7	9	6	6	1	2	6	6	2	45
Total Complaints	7	9	6	6	1	2	6	5	2	44

Table 22.E.12
Fair Housing Complaints by Issue Type
 22. City of Mentor
 2004– 2012 FHRC Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Rental	7	8	6	6	1	2	6	5	2	43
Sales		1								1
Total	7	9	6	6	1	2	6	5	2	44

Table 22.E.13
Fair Housing Complaints by Closure Status
 22. City of Mentor
 2004– 2012 FHRC Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Settled through counseling	6	8	5	6	1	2	6	3	2	39
Complaint filed in federal court										2
Reasonable Accommodation Granted	1	1						2		4
Referred to OCRC				1						1
Total	7	9	6	6	1	2	6	5	2	44

F. FAIR HOUSING SURVEY FOR HOUSING STAKEHOLDERS DATA

This section presents public involvement data gathered through the 2012–2013 Fair Housing Survey for Housing Stakeholders.

Table 22.F.1

Primary Role of Respondent

22. City of Mentor
2012–2013 Fair Housing Survey for Housing
Stakeholders Data

Primary Role	Total
Advocate/Service Provider	5
Real Estate	2
Total	7

FEDERAL, STATE, AND LOCAL LAWS

Table 22.F.2

**Familiarity with Fair
Housing Laws**

22. City of Mentor
2012–2013 Fair Housing Survey
for Housing Stakeholders Data

Familiarity	Total
Not Familiar	0
Somewhat Familiar	1
Very Familiar	5
Missing	1
Total	7

Table 22.F.3

Perceptions About Fair Housing Laws

22. City of Mentor
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?	4	1	1	1	7
Are fair housing laws difficult to understand or follow?	3	1	1	2	7
Do you think fair housing laws should be changed?	3	2	1	1	7
Do you think fair housing laws are adequately enforced?	6			1	7

Table 22.F.4

Fair Housing Activities

22. City of Mentor
2012–2013 Fair Housing Survey for Housing Stakeholders Data

2012 - 2016 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?		6			1	7
Have you participated in fair housing training?		4	2		1	7
Are you aware of any fair housing testing?		3	2	1	1	7
Testing and education	Too Little	Right Amount	Too Much	Don't Know	Missing	Total
Is there sufficient outreach and education activity?	1	2	1	2	1	7
Is there sufficient testing?	1		1	4	1	7

Table 22.F.5**Protected Classes**

22. City of Mentor

2012–2013 Fair Housing Survey
for Housing Stakeholders Data

Protected Class	Total
Family Status	3
Religion	2
Gender	3
National Origin	2
Color	2
Age	2
Military	1
Disability	2
Ethnicity	1
Race	2
Total	20

Table 22.F.6**Fair Housing Violation Referrals**

22. City of Mentor

2012–2013 Fair Housing Survey for
Housing Stakeholders Data

Referral	Total
Fair Housing Resource Center	1
Total	1

LOCAL FAIR HOUSING**Table 22.F.7****Local Fair Housing**

22. City of Mentor

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?	4	1	1	1	7
Are there any specific geographic areas that have fair housing problems?	2	2	2	1	7
Are there any specific groups in that face housing discrimination?	1	2	3	1	7

FAIR HOUSING IN THE PRIVATE SECTOR**Table 22.F.8****Barriers to Fair Housing in the Private Sector**

22. City of Mentor

2012–2013 Fair Housing Survey for Housing Stakeholders Data

Question	Yes	No	Don't Know	Missing	Total
Are you aware of any questionable practices or barriers to fair housing choice in:					
The rental housing market?	1	5		1	7
The real estate industry?	1	4	1	1	7
The mortgage and home lending industry?	1	4	1	1	7
The housing construction or accessible housing design fields?		5	1	1	7
The home insurance industry?	1	4	1	1	7
The home appraisal industry?		5	1	1	7
Any other housing services?		5	1	1	7

FAIR HOUSING IN THE PUBLIC SECTOR

Table 22.F.9

Barriers to Fair Housing in the Public Sector

22. City of Mentor

2012–2013 Fair Housing Survey for Housing Stakeholders Data

Question	Yes	No	Don't Know	Missing	Total
Are you aware of any questionable practices or barriers to fair housing choice in:					
Land use policies?		4	2	1	7
Zoning laws?		3	3	1	7
Occupancy standards or health and safety codes?		5	1	1	7
Property tax policies?	1	4	1	1	7
Permitting process?		5	1	1	7
Housing construction standards?	1	4	1	1	7
Neighborhood or community development policies?		5	1	1	7
Limited access to government services, such as employment services?	3	3		1	7
Public administrative actions or regulations?	1	4	1	1	7

NARRATIVE COMMENTS

Federal, State, and Local Laws

Table 22.F.10

How did you become aware of fair housing laws?

22. City of Mentor

2013 Fair Housing Survey Data

Comments:
In order to acquire a real estate license we must take fair housing at both the state and local level as part of our real estate law course, and then re-take it every three years in order to maintain our license

Table 22.F.11

How should fair housing laws be changed?

22. City of Mentor

2013 Fair Housing Survey Data

Comments:
More funding needs to be provided for investigation & enforcement of the current laws.

Local Fair Housing

Table 22.F.12

Are there any specific geographic areas that have fair housing problems?

22. City of Mentor

2013 Fair Housing Survey Data

Comments:
Few people of color located anywhere in the county except for Painesville. The City of Mentor defers all of their CDBG funds to Western Reserve Community Development. The net effect is the restriction of providing basic Life Safety funds to repair Mentor Seniors and Disabled homes.

Table 22.F.13**Are there any specific groups in that face housing discrimination?**

22. City of Mentor
2013 Fair Housing Survey Data

Comments:
The elderly and disbaled.

Table 22.F.14**Please share any additional comments.**

22. City of Mentor
2013 Fair Housing Survey Data

Comments:
There needs to be more effort assisting Condo homeowners in the resolution of their complaints against Condo associations.

Fair Housing in the Private Sector**Table 22.F.15****Are you aware of any questionable practices or barriers to fair housing choice in the real estate industry?**

22. City of Mentor
2013 Fair Housing Survey Data

Comments:
Mental disabilities were the basis of eviction of a Senior from her home.

Table 22.F.16**Are you aware of any questionable practices or barriers to fair housing choice in the mortgage and home lending industry?**

22. City of Mentor
2013 Fair Housing Survey Data

Comments:
HUD regulation prohibit home improvement grants & loans to persons living in mobile homes in mobile home parks.

Table 22.F.17**Are you aware of any questionable practices or barriers to fair housing choice in the home insurance industry?**

22. City of Mentor
2013 Fair Housing Survey Data

Comments:
Insurance companies drop Seniors' homeowner's insurance policies prior to the completion of HUD assistance application & construction process.

Fair Housing in the Public Sector**Table 22.F.18****Are you aware of any questionable practices or barriers to fair housing choice in property tax policies?**

22. City of Mentor
2013 Fair Housing Survey Data

Comments:
No Lake County community is currently providing tax incentives to plan or construct the amount of required Universal Design housing that will be required for the vast increase that baby boomers will need within ten years.

Table 22.F.19**Are you aware of any questionable practices or barriers to fair housing choice in housing construction standards?**

22. City of Mentor
2013 Fair Housing Survey Data

Comments:
Lake County Building Department has a track record of being counterproductive in their interaction with the building and design communities. Assistance in understanding guidelines are blocked because of this department's adversarial leadership

Table 22.F.20**Are you aware of any barriers that limit access to government services, such as a lack of transportation or employment services?**

22. City of Mentor
2013 Fair Housing Survey Data

Comments:
Public education of the availability of HUD assistance programs is not being funded or done.

Table 22.F.21**Are you aware of any questionable practices or barriers to fair housing choice in any other public administrative actions or regulations?**

22. City of Mentor
2013 Fair Housing Survey Data

Comments:
Lake County Building Department is required to lead Fair Housing policies but are blocked because of this department's adversarial leadership

G. LAND USE PLANNING SURVEY DATA

This section contains data regarding the potential effects of local land use and housing policies on fair housing choice, as gathered from the Land Use Planning Interview.

ENTITLEMENT COMMUNITY LAND USE PLANNING INTERVIEWS

In the Region's 18 entitlement cities and four entitlement counties, public sector policies were evaluated through individual telephone interviews that followed the structure of the 2012–2013 Fair Housing Survey for Government Officials, an online survey for nonentitlement community planning staff. This allowed for more thorough answers to the same key questions about public sector policies.

The appropriate planning and community development staff person or persons at these communities was solicited from members of the Progress Review Team, representing each entitlement community.

Table 22.G.1
Housing Development
 22. City of Mentor
 2012 Land Use Planning Interview Data

Question: Does your jurisdiction...	Response
Housing Development	
Have a definition for the term "dwelling unit"?	Yes
Encourage or allocate funding for affordable housing development?	Don't know
Have any potential barriers to the development of low- to moderate- income housing?	No
Occupancy Standards	
Have a definition for the term "family"?	Yes
Have any residential occupancy standards or limits?	Yes
Allow the mixed-use housing development?	Yes
Have any potential barriers to the development of mixed-use housing?	Yes
Special Needs Housing	
Have a definition for the term "disability"?	Yes
Have any particular standards/policies regarding accessible housing?	Don't know
Have any special process for persons with disabilities to request variances for accessible housing?	No
Have any special standards for the development of senior housing?	No
Distinguish senior citizen housing from other residential uses in any way?	Yes
Address group housing, or have any special policies for any other special needs housing?	Yes
Fair Housing Policies	
Have a fair housing ordinance, policy, or regulation?	No
Participate in any activities or practices for "affirmatively furthering fair housing"?	Yes

H. IMPEDIMENTS

The 2013 Northeast Ohio Regional Analysis of Impediments to Fair Housing Choice uncovered several potential issues regarding fair housing in the City of Mentor. Identification of these items as probable impediments to fair housing choice was based on HUD's definition of impediments as actions, omissions, or decisions that restrict housing choice due to protected class status or actions, omissions, or decisions that have this effect. The identified impediments are supported by evidence uncovered during the Regional AI process, with impediments of higher need being those identified in multiple sources.

These probable impediments in the entirety of the Northeast Ohio Region are presented in **Volumes I and II** of the Regional AI. They are accompanied by suggested actions that jurisdictions in the Region may implement in order to alleviate or eliminate these impediments, and are accompanied by measurable objectives. The goal of these actions and measurable objectives is to assist these agencies in offering greater housing choice for all citizens of the Northeast Ohio Region.

The following list presents the private and public sector impediments found in the City of Mentor.

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:* Failure to have sufficient fair housing policies or practices in Mentor.

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, including Mentor.

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

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

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

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

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

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

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

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

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

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

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

5. *Impediment: 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: Implementation of exclusionary policies*

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

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, including the City of Mentor. 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 other local units of government as co-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, including Mentor. 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, including Mentor. 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 and exists in Mentor.

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.

IMPEDIMENTS MATRIX

The matrix on the following page includes the impediment, data source, or sources that indicated its existence, protected classes most affected, and ranking of need for action. Level of need for action was determined based on the number of data sources that identified each impediment.

Table 22.H.1
Impediments Matrix
 22. City of Mentor
 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 ⁹¹			
Private Sector													
1	Denial of available housing units in the rental markets		X				X	X				Black and Hispanic persons	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				Black and Hispanic persons	M
10	Failure to comply with accessibility requirements in construction of housing units							X				Disabled persons	L
Public Sector													
1	Lack of sufficient fair housing policies or practices by several units of local government							X				All	L
2	Lack of sufficient fair housing outreach and education efforts							X		X		All	M
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		All	M
5	Decisions regarding definitions of "family," "dwelling unit," and related terms									X		Disabled persons, families	L
6	Lack of inclusionary policies							X		X		All	M

⁹¹ 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.

23. REMAINDER OF LAKE COUNTY

A. CENSUS BUREAU DATA

This section contains additional data from the U.S. Census Bureau.

Table 23.A.1

Population by Age

23. Remainder of Lake County
2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Under 5	10,880	6.1%	10,428	5.7%	-4.2%
5 to 19	35,116	19.8%	34,842	19.1%	-.8%
20 to 24	9,320	5.3%	9,733	5.3%	4.4%
25 to 34	23,652	13.3%	21,279	11.6%	-10.0%
35 to 54	54,793	30.9%	53,227	29.1%	-2.9%
55 to 64	17,597	9.9%	24,196	13.2%	37.5%
65 or Older	25,875	14.6%	29,177	16.0%	12.8%
Total	177,233	100.0%	182,882	100.0%	3.2%

Table 23.A.2

Elderly Population by Age

23. Remainder of Lake County
2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
65 to 66	2,721	10.5%	3,507	12.0%	28.9%
67 to 69	4,177	16.1%	5,192	17.8%	24.3%
70 to 74	6,785	26.2%	6,517	22.3%	-3.9%
75 to 79	5,794	22.4%	5,341	18.3%	-7.8%
80 to 84	3,646	14.1%	4,444	15.2%	21.9%
85 or Older	2,752	10.6%	4,176	14.3%	51.7%
Total	25,875	100.0%	29,177	100.0%	12.8%

Table 23.A.3

Population by Race and Ethnicity

23. Remainder of Lake County
2000 & 2010 Census SF1 Data

Race	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
White	168,121	94.9%	167,309	91.5%	-.5%
Black	4,203	2.4%	6,852	3.7%	63.0%
American Indian	227	.1%	236	.1%	4.0%
Asian	1,451	.8%	1,965	1.1%	35.4%
Native Hawaiian/ Pacific Islander	25	.0%	29	.0%	16.0%
Other	1,414	.8%	3,432	1.9%	142.7%
Two or More Races	1,792	1.0%	3,059	1.7%	70.7%
Total	177,233	100.0%	182,882	100.0%	3.2%
Non-Hispanic	173,717	98.0	175,681	96.1%	1.1%
Hispanic	3,516	2.0%	7,201	3.9%	104.8%

Table 23.A.4**Disability by Age**23. Remainder of Lake County
2010 Three-Year ACS Data

Age	Male		Female		Total	
	Disabled Population	Disability Rate	Disabled Population	Disability Rate	Disabled Population	Disability Rate
Under 5	0	.0%	161	3.3%	161	1.6%
5 to 17	832	5.2%	511	3.4%	1,343	4.3%
18 to 34	1,205	6.7%	819	4.9%	2,024	5.8%
35 to 64	3,512	9.3%	4,352	11.0%	7,864	10.2%
65 to 74	1,187	17.5%	1,510	18.7%	2,697	18.1%
75 or Older	2,474	49.6%	3,651	45.1%	6,125	46.8%
Total	9,210	10.4%	11,004	11.9%	20,214	11.2%

Table 23.A.5**Employment Status by Disability and Type: Age 18 to 64**23. Remainder of Lake County
2010 Three-Year ACS Data

Disability Status	Population
Employed:	86,986
With a disability:	4,278
With a hearing difficulty	1,365
With a vision difficulty	798
With a cognitive difficulty	1,166
With an ambulatory difficulty	1,652
With a self-care difficulty	196
With an independent living difficulty	537
No disability	82,708
Unemployed:	6,875
With a disability:	958
With a hearing difficulty	199
With a vision difficulty	97
With a cognitive difficulty	410
With an ambulatory difficulty	367
With a self-care difficulty	149
With an independent living difficulty	248
No disability	5,917
Not in labor force:	18,126
With a disability:	4,652
With a hearing difficulty	552
With a vision difficulty	557
With a cognitive difficulty	2,241
With an ambulatory difficulty	2,889
With a self-care difficulty	1,011
With an independent living difficulty	2,214
No disability	13,474
Total	111,987

Table 23.A.6**Households by Income**23. Remainder of Lake County
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	7,426	10.5%	7,163	9.5%
\$15,000 to \$19,999	3,794	5.3%	3,610	4.8%
\$20,000 to \$24,999	4,430	6.2%	4,429	5.9%
\$25,000 to \$34,999	9,223	13.0%	8,720	11.6%
\$35,000 to \$49,999	13,257	18.7%	11,500	15.3%
\$50,000 to \$74,999	17,180	24.2%	16,058	21.3%
\$75,000 to \$99,999	8,350	11.8%	10,665	14.1%
\$100,000 or More	7,311	10.3%	13,260	17.6%
Total	70,971	100.0%	75,405	100.0%

Table 23.A.7**Poverty by Age**23. Remainder of Lake County
2000 Census SF3 & 2010 Five-Year ACS Data

Age	2000 Census		2010 Five-Year ACS	
	Persons in Poverty	% of Total	Persons in Poverty	% of Total
Under 6	1,336	13.4%	2,246	14.3%
6 to 17	1,938	19.4%	3,407	21.7%
18 to 64	5,337	53.3%	8,773	55.8%
65 or Older	1,395	13.9%	1,301	8.3%
Total	10,006	100.0%	15,727	100.0%
Poverty Rate	5.7%	.	8.8%	.

Table 23.A.8**Households by Year Home Built**23. Remainder of Lake County
2000 Census SF3 & 2010 Five-Year ACS Data

Year Built	2000 Census		2010 Five-Year ACS	
	Households	% of Total	Households	% of Total
1939 or Earlier	8,824	12.4%	9,077	12.0%
1940 to 1949	5,553	7.8%	5,651	7.5%
1950 to 1959	16,313	23.0%	16,004	21.2%
1960 to 1969	11,500	16.2%	10,507	13.9%
1970 to 1979	12,840	18.1%	12,433	16.5%
1980 to 1989	6,594	9.3%	6,332	8.4%
1990 to 1999	9,279	13.1%	8,994	11.9%
2000 to 2004	.	.	4,142	5.5%
2005 or Later	.	.	2,265	3.0%
Total	70,903	100.0%	75,405	100.0%

Table 23.A.9**Housing Units by Type**23. Remainder of Lake County
2000 Census SF3 & 2010 Five-Year ACS Data

Unit Type	2000 Census		2010 Five-Year ACS	
	Units	% of Total	Units	% of Total
Single-Family	57,160	77.0%	62,506	77.5%
Duplex	1,461	2.0%	1,463	1.8%
Tri- or Four-Plex	1,681	2.3%	2,028	2.5%
Apartment	11,901	16.0%	12,606	15.6%
Mobile Home	1,974	2.7%	2,054	2.5%
Boat, RV, Van, Etc.	9	.0%	0	.0%
Total	74,186	100.0%	80,657	100.0%

Table 23.A.10**Housing Units by Tenure**23. Remainder of Lake County
2000 & 2010 Census SF1 Data

Tenure	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
Occupied Housing Units	70,903	95.6%	74,990	92.6%	5.8%
Owner-Occupied	53,083	74.9%	54,946	73.3%	3.5%
Renter-Occupied	17,820	25.1%	20,044	26.7%	12.5%
Vacant Housing Units	3,283	4.4%	5,994	7.4%	82.6%
Total Housing Units	74,186	100.0%	80,984	100.0%	9.2%

Table 23.A.11**Disposition of Vacant Housing Units**23. Remainder of Lake County
2000 & 2010 Census SF1 Data

Disposition	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
For Rent	1,178	35.9%	2,150	35.9%	82.5%
For Sale	652	19.9%	1,230	20.5%	88.7%
Rented or Sold, Not Occupied	338	10.3%	370	6.2%	9.5%
For Seasonal, Recreational, or Occasional Use	447	13.6%	652	10.9%	45.9%
For Migrant Workers	6	0.2%	5	.1%	-16.7%
Other Vacant	662	20.2%	1,587	26.5%	139.7%
Total	3,283	100.0%	5,994	100.0%	82.6%

Table 23.A.12**Households by Household Size**23. Remainder of Lake County
2000 & 2010 Census SF1 Data

Size	2000 Census		2010 Census		% Change 00-10
	Households	% of Total	Households	% of Total	
One Person	19,095	26.9%	21,738	29.0%	13.8%
Two Persons	24,552	34.6%	26,095	34.8%	6.3%
Three Persons	11,462	16.2%	11,655	15.5%	1.7%
Four Persons	9,748	13.7%	9,387	12.5%	-3.7%
Five Persons	4,227	6.0%	3,953	5.3%	-6.5%
Six Persons	1,190	1.7%	1,430	1.9%	20.2%
Seven Persons or More	629	.9%	732	1.0%	16.4%
Total	70,903	100.0%	74,990	100.0%	5.8%

Table 23.A.13**Household Type by Tenure**23. Remainder of Lake County
2000 & 2010 Census SF1 Data

Household Type	2000 Census		2010 Census		% Change 00–10
	Households	% of Total	Households	% of Total	
Family Households	48,329	68.2%	49,045	65.4%	1.5%
Married-Couple Family	38,335	79.3%	36,770	75.0%	-4.1%
Owner-Occupied	33,778	88.1%	32,352	88.0%	-4.2%
Renter-Occupied	4,557	11.9%	4,418	12.0%	-3.1%
Other Family	9,994	20.7%	12,275	25.0%	22.8%
Male Householder, No Spouse	2,694	27.0%	3,549	28.9%	31.7%
Owner-Occupied	1,823	67.7%	2,321	65.4%	27.3%
Renter-Occupied	871	32.3%	1,228	34.6%	41.0%
Female Householder, No Spouse	7,300	73.0%	8,726	71.1%	19.5%
Owner-Occupied	4,465	61.2%	4,819	55.2%	7.9%
Renter-Occupied	2,835	38.8%	3,907	44.8%	37.8%
Non-Family Households	22,574	31.8%	25,945	34.6%	14.9%
Owner-Occupied	13,017	57.7%	15,454	59.6%	18.7%
Renter-Occupied	9,557	42.3%	10,491	40.4%	9.8%
Total	70,903	100.0%	74,990	100.0%	5.8%

Table 23.A.14**Group Quarters Population**23. Remainder of Lake County
2000 & 2010 Census SF1 Data

Group Quarters Type	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Institutionalized					
Correctional Institutions	315	20.1%	295	19.8%	-6.3%
Juvenile Facilities	.	.	9	.6%	.
Nursing Homes	1,220	77.7%	1,185	79.6%	-2.9%
Other Institutions	35	2.2%	0	.0%	-100.0%
Total	1,570	100.0%	1,489	100.0%	-5.2%
Noninstitutionalized					
College Dormitories	305	35.7%	468	52.3%	53.4%
Military Quarters	5	.6%	24	2.7%	380.0%
Other Noninstitutional	544	63.7%	402	45.0%	-26.1%
Total	854	35.2%	894	37.5%	4.7%
Total Group Quarters Population	2,424	100.0%	2,383	100.0%	-1.7%

Table 23.A.15**Overcrowding and Severe Overcrowding**23. Remainder of Lake County
2000 Census SF3 & 2010 Five-Year ACS Data

Data Source	No Overcrowding		Overcrowding		Severe Overcrowding		Total
	Households	% of Total	Households	% of Total	Households	% of Total	
Owner							
2000 Census	52,696	99.3%	307	.6%	63	.1%	53,066
2010 ACS	55,889	99.4%	271	.5%	74	.1%	56,234
Renter							
2000 Census	17,359	97.3%	276	1.5%	202	1.1%	17,837
2010 ACS	18,853	98.3%	267	1.4%	51	.3%	19,171
Total							
2000 Census	70,055	98.8%	583	.8%	265	.4%	70,903
2010 ACS	74,742	99.1%	538	.7%	125	.2%	75,405

Table 23.A.16
Households with Incomplete Plumbing Facilities
 23. Remainder of Lake County
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Plumbing Facilities	70,772	75,250
Lacking Complete Plumbing Facilities	131	155
Total Households	70,903	75,405
Percent Lacking	.2%	.2%

Table 23.A.17
Households with Incomplete Kitchen Facilities
 23. Remainder of Lake County
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Kitchen Facilities	70,739	75,250
Lacking Complete Kitchen Facilities	164	155
Total Households	70,903	75,405
Percent Lacking	.2%	.2%

Table 23.A.18
Cost Burden and Severe Cost Burden by Tenure
 23. Remainder of Lake County
 2000 Census & 2010 Five-Year ACS Data

Data Source	Less Than 30%		31%-50%		Above 50%		Not Computed		Total
	Households	% of Total	Households	% of Total	Households	% of Total	Households	% of Total	
Owner With a Mortgage									
2000 Census	25,295	75.0%	5,768	17.1%	2,577	7.6%	100	.3%	33,740
2010 ACS	25,641	65.8%	8,953	23.0%	4,313	11.1%	49	.1%	38,956
Owner Without a Mortgage									
2000 Census	13,106	90.6%	776	5.4%	402	2.8%	175	1.2%	14,459
2010 ACS	14,457	83.7%	1,758	10.2%	945	5.5%	118	.7%	17,278
Renter									
2000 Census	10,771	60.9%	3,307	18.7%	2,636	14.9%	958	5.4%	17,672
2010 ACS	9,749	50.9%	4,097	21.4%	4,256	22.2%	1,069	5.6%	19,171
Total									
2000 Census	49,172	74.6%	9,851	15.0%	5,615	8.5%	1,233	1.9%	65,871
2010 ACS	49,847	66.1%	14,808	19.6%	9,514	12.6%	1,236	1.6%	75,405

Table 23.A.19
Median Housing Costs
 23. Remainder of Lake County
 2000 Census SF3 & 2010 Five-Year ACS Data

Housing Cost	2000 Census	2010 ACS
Median Contract Rent	\$-61	\$-57
Median Home Value	\$-19,500	\$-14,500

B. BLS DATA

This section contains Bureau of Labor Statistics (BLS) data that address employment and income.

Table 23.B.1
Labor Force Statistics
 23. Remainder of Lake County
 1990–2011 BLS Data

Year	Labor Force	Employment	Unemployment	Unemployment Rate	Statewide Unemployment Rate
1990	91,341	86,122	5,219	5.7%	5.7%
1991	90,376	84,250	6,126	6.8%	6.6%
1992	92,442	84,898	7,544	8.2%	7.4%
1993	94,123	86,787	7,336	7.8%	6.7%
1994	95,227	88,860	6,367	6.7%	5.6%
1995	94,868	90,047	4,821	5.1%	4.9%
1996	96,007	91,801	4,206	4.4%	5.0%
1997	97,534	93,639	3,895	4.0%	4.6%
1998	100,207	96,579	3,628	3.6%	4.3%
1999	101,962	97,993	3,969	3.9%	4.3%
2000	99,650	96,040	3,610	3.6%	4.0%
2001	100,834	96,486	4,348	4.3%	4.4%
2002	101,227	95,785	5,442	5.4%	5.7%
2003	101,425	95,496	5,929	5.8%	6.2%
2004	101,193	95,456	5,737	5.7%	6.1%
2005	101,031	95,663	5,368	5.3%	5.9%
2006	101,905	96,733	5,172	5.1%	5.4%
2007	103,582	97,802	5,780	5.6%	5.6%
2008	104,117	97,671	6,446	6.2%	6.5%
2009	104,178	95,312	8,866	8.5%	10.1%
2010	103,408	94,839	8,569	8.3%	10.0%
2011	103,636	96,093	7,543	7.3%	8.6%

C. HMDA DATA

The Home Mortgage Disclosure Act (HMDA) requires both depository and non-depository lenders to collect and publicly disclose information about housing-related loans and loan applications.⁹² The information presented in this section presents detailed HMDA data, including denial rates and predatory lending including high annual percentage rate (APR) loans.

Table 23.C.1
Purpose of Loan by Year
 23. Remainder of Lake County
 2004–2011 HMDA Data

Purpose	2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	6,006	6,864	6,514	4,573	3,163	3,202	2,753	2,472	35,547
Home Improvement	1,266	1,449	1,348	1,064	667	461	307	341	6,903
Refinancing	11,526	11,293	9,712	6,801	4,482	6,797	6,271	5,467	62,349
Total	18,798	19,606	17,574	12,438	8,312	10,460	9,331	8,280	104,799

Table 23.C.2
Occupancy Status for Home Purchase Loan Applications
 23. Remainder of Lake County
 2004–2011 HMDA Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	Total
Owner-Occupied	5,569	6,298	5,818	4,166	2,933	3,072	2,610	2,342	32,808
Not Owner-Occupied	382	555	679	393	224	129	135	128	2,625
Not Applicable	55	11	17	14	6	1	8	2	114
Total	6,006	6,864	6,514	4,573	3,163	3,202	2,753	2,472	35,547

Table 23.C.3
Owner-Occupied Home Purchase Loan Applications by Loan Type
 23. Remainder of Lake County
 2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Conventional	4,783	5,594	5,219	3,561	1,550	1,122	970	1,002	23,801
FHA - Insured	688	618	480	505	1,201	1,670	1,421	1,098	7,681
VA - Guaranteed	85	82	117	89	131	130	101	130	865
Rural Housing Service or Farm Service Agency	13	4	2	11	51	150	118	112	461
Total	5,569	6,298	5,818	4,166	2,933	3,072	2,610	2,342	32,808

⁹² Data are considered “raw” because they contain entry errors and incomplete loan applications. Starting in 2004, the HMDA data made substantive changes in reporting. It modified the way it handled Hispanic data, loan interest rates, and the reporting of multifamily loan applications.

DENIAL RATES

Table 23.C.4
Loan Applications by Action Taken
 23. Remainder of Lake County
 2004–2011 HMDA Data

Action	2004	2005	2006	2007	2008	2009	2010	2011	Total
Loan Originated	3,341	3,662	3,196	2,226	1,638	1,484	1,345	1,177	18,069
Application Approved but not Accepted	285	292	335	224	92	70	55	64	1,417
Application Denied	479	509	492	395	250	178	182	179	2,664
Application Withdrawn by Applicant	317	409	352	191	175	144	140	137	1,865
File Closed for Incompleteness	91	110	72	49	36	29	27	18	432
Loan Purchased by the Institution	1,056	1,311	1,369	1,074	741	1,166	861	767	8,345
Preapproval Request Denied	0	5	2	7	1	1	0	0	16
Preapproval Approved but not Accepted	0	0	0	0	0	0	0	0	0
Total	5,569	6,298	5,818	4,166	2,933	3,072	2,610	2,342	32,808
Denial Rate	12.5%	12.2%	13.3%	15.1%	13.2%	10.7%	11.9%	13.2%	12.8%

Table 23.C.5
Denial Rates by Gender of Applicant
 23. Remainder of Lake County
 2004–2011 HMDA Data

Year	Male	Female	Not Available	Not Applicable	Average
2004	11.0%	13.0%	48.4%	%	12.5%
2005	11.0%	13.5%	28.3%	.0%	12.2%
2006	11.4%	16.5%	24.1%	%	13.3%
2007	13.1%	17.8%	34.3%	%	15.1%
2008	12.9%	12.0%	31.0%	100.0%	13.2%
2009	10.1%	10.7%	27.5%	%	10.7%
2010	11.0%	13.4%	14.5%	%	11.9%
2011	11.3%	15.8%	23.5%	%	13.2%
Average	11.5%	14.3%	29.9%	50.0%	12.8%

Table 23.C.6
Loan Applications by Selected Action Taken by Gender of Applicant
 23. Remainder of Lake County
 2004–2011 HMDA Data

Gender		2004	2005	2006	2007	2008	2009	2010	2011	Total
Male	Originated	2,283	2,517	2,165	1,534	1,085	981	865	775	12,205
	Denied	283	312	278	231	161	110	107	99	1,581
	Denial Rate	11.0%	11.0%	11.4%	13.1%	12.9%	10.1%	11.0%	11.3%	11.5%
Female	Originated	1,010	1,068	946	646	513	474	433	363	5,453
	Denied	151	167	187	140	70	57	67	68	907
	Denial Rate	13.0%	13.5%	16.5%	17.8%	12.0%	10.7%	13.4%	15.8%	14.3%
Not Available	Originated	48	76	85	46	40	29	47	39	410
	Denied	45	30	27	24	18	11	8	12	175
	Denial Rate	48.4%	28.3%	24.1%	34.3%	31.0%	27.5%	14.5%	23.5%	29.9%
Not Applicable	Originated	0	1	0	0	0	0	0	0	1
	Denied	0	0	0	0	1	0	0	0	1
	Denial Rate	%	.0%	%	%	100.0%	%	%	%	50.0%
Total	Originated	3,341	3,662	3,196	2,226	1,638	1,484	1,345	1,177	18,069
	Denied	479	509	492	395	250	178	182	179	2,664
	Denial Rate	12.5%	12.2%	13.3%	15.1%	13.2%	10.7%	11.9%	13.2%	12.8%

Table 23.C.7
Denial Rates by Race/Ethnicity of Applicant
 23. Remainder of Lake County
 2004–2011 HMDA Data

Race/Ethnicity	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	16.7%	42.1%	.0%	.0%	.0%	66.7%	.0%	33.3%	28.6%
Asian	7.1%	4.4%	11.6%	10.5%	8.0%	11.8%	11.1%	8.3%	8.8%
Black	26.9%	22.1%	29.0%	33.9%	28.9%	19.0%	26.1%	6.7%	26.5%
White	11.0%	10.7%	12.0%	13.9%	11.9%	9.8%	11.4%	12.5%	11.6%
Not Available	33.0%	28.1%	26.6%	28.1%	30.5%	23.9%	17.3%	25.6%	27.8%
Not Applicable	66.7%	.0%	%	%	%	0%	0%	%	50.0%
Average	12.5%	12.2%	13.3%	15.1%	13.2%	10.7%	11.9%	13.2%	12.8%
Non-Hispanic	11.5%	10.7%	12.2%	13.5%	12.1%	9.9%	11.3%	12.0%	11.7%
Hispanic	10.2%	19.4%	17.5%	38.7%	18.8%	19.2%	29.6%	33.3%	22.4%

Table 23.C.8
Loan Applications by Selected Action Taken by Race/Ethnicity of Applicant
 23. Remainder of Lake County
 2004–2011 HMDA Data

Race		2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Originated	5	11	10	2	1	2	2	2	35
	Denied	1	8	0	0	0	4	0	1	14
	Denial Rate	16.7%	42.1%	.0%	.0%	.0%	.0%	.0%	33.3%	28.6%
Asian	Originated	39	43	38	34	23	15	24	11	227
	Denied	3	2	5	4	2	2	3	1	22
	Denial Rate	7.1%	4.4%	11.6%	10.5%	8.0%	11.8%	11.1%	8.3%	8.8%
Black	Originated	49	60	71	39	27	17	17	14	294
	Denied	18	17	29	20	11	4	6	1	106
	Denial Rate	26.9%	22.1%	29.0%	33.9%	28.9%	19.0%	26.1%	6.7%	26.5%
White	Originated	3,103	3,330	2,906	2,046	1,514	1,396	1,235	1,089	16,619
	Denied	384	397	396	330	205	151	159	155	2,177
	Denial Rate	11.0%	10.7%	12.0%	13.9%	11.9%	9.8%	11.4%	12.5%	11.6%
Not Available	Originated	144	217	171	105	73	54	67	61	892
	Denied	71	85	62	41	32	17	14	21	343
	Denial Rate	33.0%	28.1%	26.6%	28.1%	30.5%	23.9%	17.3%	25.6%	27.8%
Not Applicable	Originated	1	1	0	0	0	0	0	0	2
	Denied	2	0	0	0	0	0	0	0	2
	Denial Rate	33.0%	28.1%	26.6%	28.1%	30.5%	23.9%	17.3%	25.6%	50.0%
Total	Originated	3,341	3,662	3,196	2,226	1,638	1,484	1,345	1,177	18,069
	Denied	479	509	492	395	250	178	182	179	2,664
	Denial Rate	12.5%	12.2%	13.3%	15.1%	13.2%	10.7%	11.9%	13.2%	12.8%
Non-Hispanic	Originated	2,808	3,340	2,929	2,082	1,539	1,416	1,258	1,106	16,478
	Denied	365	400	407	324	211	155	161	151	2,174
	Denial Rate	11.5%	10.7%	12.2%	13.5%	12.1%	9.9%	11.3%	12.0%	11.7%
Hispanic	Originated	53	83	80	46	26	21	19	18	346
	Denied	6	20	17	29	6	5	8	9	100
	Denial Rate	10.2%	19.4%	17.5%	38.7%	18.8%	19.2%	29.6%	33.3%	22.4%

Table 23.C.9
Loan Applications by Reason for Denial
 23. Remainder of Lake County
 2004–2011 HMDA Data

Denial Reason	2004	2005	2006	2007	2008	2009	2010	2011	Total
Debt-to-Income Ratio	74	49	60	76	59	46	42	39	445
Employment History	5	8	8	5	7	4	5	4	46
Credit History	92	102	90	79	36	44	49	40	532
Collateral	40	58	56	34	47	29	35	26	325
Insufficient Cash	12	17	6	9	8	4	5	3	64
Unverifiable Information	15	19	25	29	10	6	3	4	111
Credit Application Incomplete	50	43	47	38	22	14	22	30	266
Mortgage Insurance Denied	0	1	0	0	2	1	2	1	7
Other	89	113	84	54	24	17	11	12	404
Missing	102	99	116	71	35	13	8	20	464
Total	479	509	492	395	250	178	182	179	2,664

Table 23.C.10
Denial Rates by Income of Applicant
 23. Remainder of Lake County
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	41.2%	43.8%	40.9%	50.0%	75.0%	33.3%	60.0%	71.4%	47.8%
\$15,001–\$30,000	19.4%	22.9%	24.2%	27.2%	22.7%	11.6%	22.0%	23.4%	21.7%
\$30,001–\$45,000	14.4%	13.8%	16.2%	19.3%	15.0%	9.1%	12.5%	13.2%	14.5%
\$45,001–\$60,000	12.0%	12.3%	14.5%	14.2%	13.3%	9.3%	10.3%	14.5%	12.8%
\$60,001–\$75,000	7.8%	10.2%	10.5%	11.6%	9.8%	11.1%	9.9%	10.4%	10.0%
Above \$75,000	7.6%	7.7%	7.3%	8.9%	8.8%	11.3%	8.5%	7.5%	8.2%
Data Missing	24.0%	12.8%	17.2%	35.2%	33.3%	40.0%	25.0%	42.9%	21.7%
Total	12.5%	12.2%	13.3%	15.1%	13.2%	10.7%	11.9%	13.2%	12.8%

Table 23.C.11
Denial Rates of Loans by Race/Ethnicity and Income of Applicant
 23. Remainder of Lake County
 2004–2011 HMDA Data

Race	<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	Above \$75K	Data Missing	Average
American Indian	%	50.0%	.0%	30.0%	45.5%	18.8%	.0%	28.6%
Asian	.0%	5.6%	11.8%	16.3%	11.1%	5.9%	.0%	8.8%
Black	50.0%	28.6%	30.3%	22.1%	29.4%	22.0%	43.8%	26.5%
White	50.7%	20.3%	13.2%	11.5%	8.8%	7.6%	14.9%	11.6%
Not Available	38.5%	38.6%	30.7%	29.8%	20.6%	14.0%	60.5%	27.8%
Not Applicable	%	.0%	%	100.0%	%	.0%	%	50.0%
Average	47.8%	21.7%	14.5%	12.8%	10.0%	8.2%	21.7%	12.8%
Non-Hispanic Ethnicity	46.5%	20.0%	13.4%	11.4%	9.3%	7.9%	15.1%	11.7%
Hispanic (Ethnicity)	60.0%	33.3%	17.8%	21.1%	21.9%	7.8%	46.7%	22.4%

Table 23.C.12
Loan Applications by Reason for Denial by Race/Ethnicity of Applicant
 23. Remainder of Lake County
 2004–2011 HMDA Data

Denial Reason	American Indian	Asian	Black	White	Not Available	Not Applicable	Total	Hispanic (Ethnicity)
Debt-to-Income Ratio	1	8	18	374	44	0	445	21
Employment History	0	1	2	34	9	0	46	5
Credit History	6	5	25	444	52	0	532	12
Collateral	0	0	10	275	40	0	325	13
Insufficient Cash	1	0	3	55	5	0	64	5
Unverifiable Information	1	2	6	90	11	1	111	0
Credit Application Incomplete	0	2	8	217	39	0	266	5
Mortgage Insurance Denied	0	0	0	7	0	0	7	0
Other	1	2	13	327	60	1	404	19
Missing	4	2	21	354	83	0	464	20
Total	14	22	106	2,177	343	2	2,664	100
% Missing	28.6%	9.1%	19.8%	16.3%	24.2%	.0%	17.4%	20.0%

Table 23.C.13
Loan Applications by Income of Applicant: Originated and Denied
 23. Remainder of Lake County
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Loan Originated	10	9	13	4	2	6	2	2	48
	Application Denied	7	7	9	4	6	3	3	5	44
	Denial Rate	41.2%	43.8%	40.9%	50.0%	75.0%	33.3%	60.0%	71.4%	47.8%
\$15,001–\$30,000	Loan Originated	336	280	248	177	143	183	149	134	1,650
	Application Denied	81	83	79	66	42	24	42	41	458
	Denial Rate	19.4%	22.9%	24.2%	27.2%	22.7%	11.6%	22.0%	23.4%	21.7%
\$30,001–\$45,000	Loan Originated	900	923	666	448	414	380	314	275	4,320
	Application Denied	151	148	129	107	73	38	45	42	733
	Denial Rate	14.4%	13.8%	16.2%	19.3%	15.0%	9.1%	12.5%	13.2%	14.5%
\$45,001–\$60,000	Loan Originated	680	753	688	525	327	322	253	201	3,749
	Application Denied	93	106	117	87	50	33	29	34	549
	Denial Rate	12.0%	12.3%	14.5%	14.2%	13.3%	9.3%	10.3%	14.5%	12.8%
\$60,001–\$75,000	Loan Originated	440	537	434	313	211	200	182	163	2,480
	Application Denied	37	61	51	41	23	25	20	19	277
	Denial Rate	7.8%	10.2%	10.5%	11.6%	9.8%	11.1%	9.9%	10.4%	10.0%
Above \$75,000	Loan Originated	848	1,044	1,017	724	531	384	439	394	5,381
	Application Denied	70	87	80	71	51	49	41	32	481
	Denial Rate	7.6%	7.7%	7.3%	8.9%	8.8%	11.3%	8.5%	7.5%	8.2%
Data Missing	Loan Originated	127	116	130	35	10	9	6	8	441
	Application Denied	40	17	27	19	5	6	2	6	122
	Denial Rate	24.0%	12.8%	17.2%	35.2%	33.3%	40.0%	25.0%	42.9%	21.7%
Total	Loan Originated	3,341	3,662	3,196	2,226	1,638	1,484	1,345	1,177	18,069
	Application Denied	479	509	492	395	250	178	182	179	2,664
	Denial Rate	12.5%	12.2%	13.3%	15.1%	13.2%	10.7%	11.9%	13.2%	12.8%

Table 23.C.14
Loan Applications by Income and Race/Ethnicity of Applicant: Originated and Denied
 23. Remainder of Lake County
 2004–2011 HMDA Data

Race		<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	> \$75K	Data Missing	Total
American Indian	Loan Originated	0	3	4	7	6	13	2	35
	Application Denied	0	3	0	3	5	3	0	14
	Denial Rate	%	50.0%	.0%	30.0%	45.5%	18.8%	.0%	28.6%
Asian	Loan Originated	2	17	30	36	24	112	6	227
	Application Denied	0	1	4	7	3	7	0	22
	Denial Rate	.0%	5.6%	11.8%	16.3%	11.1%	5.9%	.0%	8.8%
Black	Loan Originated	1	15	62	81	48	78	9	294
	Application Denied	1	6	27	23	20	22	7	106
	Denial Rate	50.0%	28.6%	30.3%	22.1%	29.4%	22.0%	43.8%	26.5%
White	Loan Originated	37	1,517	4,019	3,474	2,290	4,888	394	16,619
	Application Denied	38	387	611	450	220	402	69	2,177
	Denial Rate	50.7%	20.3%	13.2%	11.5%	8.8%	7.6%	14.9%	11.6%
Not Available	Loan Originated	8	97	205	151	112	289	30	892
	Application Denied	5	61	91	64	29	47	46	343
	Denial Rate	38.5%	38.6%	30.7%	29.8%	20.6%	14.0%	60.5%	27.8%
Not Applicable	Loan Originated	0	1	0	0	0	1	0	2
	Application Denied	0	0	0	2	0	0	0	2
	Denial Rate	%	.0%	%	100.0%	%	.0%	%	50.0%
Total	Loan Originated	48	1,650	4,320	3,749	2,480	5,381	441	18,069
	Application Denied	44	458	733	549	277	481	122	2,664
	Denial Rate	47.8%	21.7%	14.5%	12.8%	10.0%	8.2%	21.7%	12.8%
Non-Hispanic Ethnicity	Loan Originated	38	1,464	3,908	3,450	2,293	4,938	387	16,478
	Application Denied	33	365	603	446	236	422	69	2,174
	Denial Rate	46.5%	20.0%	13.4%	11.4%	9.3%	7.9%	15.1%	11.7%
Hispanic (Ethnicity)	Loan Originated	2	64	125	75	25	47	8	346
	Application Denied	3	32	27	20	7	4	7	100
	Denial Rate	60.0%	33.3%	17.8%	21.1%	21.9%	7.8%	46.7%	22.4%

PREDATORY LENDING

Table 23.C.15
Originated Owner-Occupied Loans by HAL Status
 23. Remainder of Lake County
 2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Other	3,029	2,916	2,594	2,012	1,534	1,401	1,336	1,175	15,997
HAL	312	746	602	214	104	83	9	2	2,072
Total	3,341	3,662	3,196	2,226	1,638	1,484	1,345	1,177	18,069
Percent HAL	9.3%	20.4%	18.8%	9.6%	6.3%	5.6%	.7%	.2%	11.5%

Table 23.C.16
Loans by Loan Purpose by HAL Status
 23. Remainder of Lake County
 2004–2011 HMDA Data

Loan Purpose		2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	Other	3,029	2,916	2,594	2,012	1,534	1,401	1,336	1,175	15,997
	HAL	312	746	602	214	104	83	9	2	2,072
	Percent HAL	9.3%	20.4%	18.8%	9.6%	6.3%	5.6%	.7%	.2%	11.5%
Home Improvement	Other	365	398	443	357	197	124	88	114	2,086
	HAL	91	136	118	65	41	21	10	13	495
	Percent HAL	20.0%	25.5%	21.0%	15.4%	17.2%	14.5%	10.2%	10.2%	19.2%
Refinancing	Other	3,858	2,894	2,249	1,726	1,456	2,843	2,985	2,573	20,584
	HAL	683	1,073	921	387	172	149	28	12	3,425
	Percent HAL	15.0%	27.0%	29.1%	18.3%	10.6%	5.0%	.9%	.5%	14.3%
Total	Other	7,252	6,208	5,286	4,095	3,187	4,368	4,409	3,862	38,667
	HAL	1,086	1,955	1,641	666	104	83	9	2	5,992
	Percent HAL	13.0%	23.9%	23.7%	14.0%	9.0%	5.5%	1.1%	.7%	13.4%

Table 23.C.17
HALs Originated by Race of Borrower
 23. Remainder of Lake County
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	1	3	1	1	1	0	0	0	7
Asian	2	8	1	0	0	0	0	0	11
Black	10	30	31	8	3	1	1	0	84
White	260	597	518	192	95	78	8	2	1,750
Not Available	39	108	51	13	5	4	0	0	220
Not Applicable	0	0	0	0	0	0	0	0	0
Total	312	746	602	214	104	83	9	2	2,072
Hispanic (Ethnicity)	4	27	30	5	2	1	0	0	69

Table 23.C.18
Rate of HALs Originated by Race/Ethnicity of Borrower
 23. Remainder of Lake County
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	20.0%	27.3%	10.0%	50.0%	100.0%	.0%	.0%	.0%	20.0%
Asian	5.1%	18.6%	2.6%	.0%	.0%	.0%	.0%	.0%	4.8%
Black	20.4%	50.0%	43.7%	20.5%	11.1%	5.9%	5.9%	.0%	28.6%
White	8.4%	17.9%	17.8%	9.4%	6.3%	5.6%	.6%	.2%	10.5%
Not Available	27.1%	49.8%	29.8%	12.4%	6.8%	7.4%	.0%	.0%	24.7%
Not Applicable	.0%	.0%	%	%	%	%	%	%	0%
Average	9.3%	20.4%	18.8%	9.6%	6.3%	5.6%	0.7%	0.2%	11.5%
Non-Hispanic Ethnicity	8.8%	18.2%	17.7%	9.5%	6.2%	5.6%	.7%	.1%	10.6%
Hispanic (Ethnicity)	7.5%	32.5%	37.5%	10.9%	7.7%	4.8%	.0%	.0%	19.9%

Table 23.C.19
Loans by HAL Status by Race/Ethnicity of Borrower
 23. Remainder of Lake County
 2004–2011 HMDA Data

Race	Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Other	4	8	9	1	0	2	2	2	28
	HAL	1	3	1	1	1	0	0	0	7
	Percent HAL	20.0%	27.3%	10.0%	50.0%	100.0%	.0%	.0%	.0%	20.0%
Asian	Other	37	35	37	34	23	15	24	11	216
	HAL	2	8	1	0	0	0	0	0	11
	Percent HAL	5.1%	18.6%	2.6%	.0%	.0%	.0%	.0%	.0%	4.8%
Black	Other	39	30	40	31	24	16	16	14	210
	HAL	10	30	31	8	3	1	1	0	84
	Percent HAL	20.4%	50.0%	43.7%	20.5%	11.1%	5.9%	5.9%	.0%	28.6%
White	Other	2,843	2,733	2,388	1,854	1,419	1,318	1,227	1,087	14,869
	HAL	260	597	518	192	95	78	8	2	1,750
	Percent HAL	8.4%	17.9%	17.8%	9.4%	6.3%	5.6%	0.6%	0.2%	10.5%
Not Available	Other	105	109	120	92	68	50	67	61	672
	HAL	39	108	51	13	5	4	0	0	220
	Percent HAL	27.1%	49.8%	29.8%	12.4%	6.8%	7.4%	.0%	.0%	24.7%
Not Applicable	Other	1	1	0	0	0	0	0	0	2
	HAL	0	0	0	0	0	0	0	0	0
	Percent HAL	.0%	.0%	%	%	%	%	%	%	0.0%
Total	Other	3,029	2,916	2,594	2,012	1,534	1,401	1,336	1,175	15,997
	HAL	312	746	602	214	104	83	9	2	2,072
	Percent HAL	9.3%	20.4%	18.8%	9.6%	6.3%	5.6%	.7%	.2%	11.5%
Non-Hispanic Ethnicity	Other	2,562	2,732	2,412	1,884	1,443	1,337	1,249	1,105	14,724
	HAL	246	608	517	198	96	79	9	1	1,754
	Percent HAL	8.8%	18.2%	17.7%	9.5%	6.2%	5.6%	.7%	.1%	10.6%
Hispanic (Ethnicity)	Other	49	56	50	41	24	20	19	18	277
	HAL	4	27	30	5	2	1	0	0	69
	Percent HAL	7.5%	32.5%	37.5%	10.9%	7.7%	4.8%	.0%	.0%	19.9%

Table 23.C.20
Rates of HALs by Income of Borrower
 23. Remainder of Lake County
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Average
\$15,000 or Below	.0%	.0%	7.7%	.0%	.0%	.0%	.0%	.0%	2.1%
\$15,001–\$30,000	11.0%	23.9%	23.0%	10.7%	8.4%	6.6%	.7%	.7%	12.5%
\$30,001–\$45,000	12.0%	25.6%	23.3%	9.6%	7.5%	7.6%	1.0%	.0%	14.0%
\$45,001–\$60,000	11.9%	25.0%	22.5%	11.0%	7.6%	6.2%	.4%	.0%	14.1%
\$60,001–\$75,000	5.7%	18.8%	22.4%	9.3%	6.6%	6.5%	1.1%	.0%	11.3%
Above \$75,000	6.4%	11.8%	9.1%	7.9%	4.1%	2.1%	0.5%	.3%	6.7%
Data Missing	5.5%	26.7%	33.8%	22.9%	.0%	11.1%	.0%	.0%	20.6%
Average	9.3%	20.4%	18.8%	9.6%	6.3%	5.6%	.7%	.2%	11.5%

Table 23.C.21
Loans by HAL Status by Income of Borrower
 23. Remainder of Lake County
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Other	10	9	12	4	2	6	2	2	47
	HAL	0	0	1	0	0	0	0	0	1
	Percent HAL	.0%	.0%	7.7%	.0%	.0%	.0%	.0%	.0%	2.1%
\$15,001–\$30,000	Other	299	213	191	158	131	171	148	133	1,444
	HAL	37	67	57	19	12	12	1	1	206
	Percent HAL	11.0%	23.9%	23.0%	10.7%	8.4%	6.6%	.7%	.7%	12.5%
\$30,001–\$45,000	Other	792	687	511	405	383	351	311	275	3,715
	HAL	108	236	155	43	31	29	3	0	605
	Percent HAL	12.0%	25.6%	23.3%	9.6%	7.5%	7.6%	1.0%	.0%	14.0%
\$45,001 – \$60,000	Other	599	565	533	467	302	302	252	201	3,221
	HAL	81	188	155	58	25	20	1	0	528
	Percent HAL	11.9%	25.0%	22.5%	11.0%	7.6%	6.2%	.4%	.0%	14.1%
\$60,001–\$75,000	Other	415	436	337	284	197	187	180	163	2,199
	HAL	25	101	97	29	14	13	2	0	281
	Percent HAL	5.7%	18.8%	22.4%	9.3%	6.6%	6.5%	1.1%	.0%	11.3%
Above \$75,000	Other	794	921	924	667	509	376	437	393	5,021
	HAL	54	123	93	57	22	8	2	1	360
	Percent HAL	6.4%	11.8%	9.1%	7.9%	4.1%	2.1%	.5%	.3%	6.7%
Data Missing	Other	120	85	86	27	10	8	6	8	350
	HAL	7	31	44	8	0	1	0	0	91
	Percent HAL	5.5%	26.7%	33.8%	22.9%	.0%	11.1%	.0%	.0%	20.6%
Total	Other	3,029	2,916	2,594	2,012	1,534	1,401	1,336	1,175	15,997
	HAL	312	746	602	214	104	83	9	2	2,072
	Percent HAL	9.3%	20.4%	18.8%	9.6%	6.3%	5.6%	.7%	.2%	11.5%

D. CRA DATA

Additional data tables related to Community Reinvestment Act (CRA) data are presented in this section.

Table 23.D.1
Small Business Loans Originated: \$100,000 or Less by Tract MFI
 23. Remainder of Lake County
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000		129	1,889	650		2,668
2001		142	2,176	715		3,033
2002		192	2,793	935		3,920
2003		378	2,916	882		4,176
2004		345	2,948	936		4,229
2005		394	3,014	1,083		4,491
2006		461	4,041	1,410		5,912
2007		471	4,331	1,771		6,573
2008		378	3,329	1,365		5,072
2009		178	1,377	609		2,164
2010		169	1,264	534		1,967
2011		184	1,501	609		2,294
Total	0	3,421	31,579	11,499	0	46,499
Loan Amount (\$1,000s)						
2000		1,781	27,531	8,670		37,982
2001		1,547	26,587	7,902		36,036
2002		2,406	31,387	9,358		43,151
2003		3,818	29,612	9,037		42,467
2004		3,633	29,080	10,755		43,468
2005		4,748	35,395	11,175		51,318
2006		5,072	43,646	15,309		64,027
2007		5,570	46,639	17,728		69,937
2008		4,571	35,521	13,529		53,621
2009		2,906	19,887	6,695		29,488
2010		2,831	20,672	7,297		30,800
2011		3,619	24,181	7,635		35,435
Total	0	42,502	370,138	125,090	0	537,730

Table 23.D.2
Small Business Loans Originated: \$100,001 to \$250,000 by Tract MFI
 23. Remainder of Lake County
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000		9	82	25		116
2001		10	111	32		153
2002		11	122	37		170
2003		22	92	20		134
2004		28	106	27		161
2005		21	113	16		150
2006		26	118	21		165
2007		15	109	23		147
2008		14	88	26		128
2009		10	39	16		65
2010		11	82	13		106
2011		19	88	20		127
Total	0	196	1,150	276	0	1,622
Loan Amount (\$1,000s)						
2000		1,610	14,462	4,610		20,682
2001		1,833	20,164	5,798		27,795
2002		1,908	22,054	6,492		30,454
2003		4,059	16,274	3,577		23,910
2004		5,254	18,960	4,887		29,101
2005		3,926	20,033	3,086		27,045
2006		4,659	21,659	3,755		30,073
2007		2,824	19,082	4,229		26,135
2008		2,385	15,101	4,520		22,006
2009		1,913	6,417	2,487		10,817
2010		2,255	14,329	2,321		18,905
2011		3,547	15,504	3,440		22,491
Total	0	36,173	204,039	49,202	0	289,414

Table 23.D.3
Small Business Loans Originated: More than \$250,000 by Tract MFI
 23. Remainder of Lake County
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000		10	80	20		110
2001		8	90	27		125
2002		11	129	27		167
2003		26	111	26		163
2004		14	123	21		158
2005		19	120	23		162
2006		16	112	17		145
2007		24	101	20		145
2008		15	77	19		111
2009		16	69	13		98
2010		20	102	17		139
2011		23	94	14		131
Total	0	202	1,208	244	0	1,654
Loan Amount (\$1,000s)						
2000		6,136	43,663	9,673		59,472
2001		4,653	47,082	12,972		64,707
2002		6,074	67,605	14,053		87,732
2003		14,998	58,572	11,538		85,108
2004		8,620	63,098	11,009		82,727
2005		10,106	66,475	10,788		87,369
2006		9,682	58,545	8,865		77,092
2007		15,038	58,436	8,284		81,758
2008		8,364	39,821	8,859		57,044
2009		9,460	40,323	5,054		54,837
2010		11,809	54,279	8,367		74,455
2011		12,448	50,777	6,577		69,802
Total	0	117,388	648,676	116,039	0	882,103

Table 23.D.4
Small Business Loans to Businesses with Gross Annual Revenues of Less Than \$1 Million by Tract MFI
 23. Remainder of Lake County
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000		55	825	278		1,158
2001		59	1,051	279		1,389
2002		62	814	249		1,125
2003		119	1,012	289		1,420
2004		105	1,029	346		1,480
2005		162	1,340	491		1,993
2006		178	1,550	536		2,264
2007		162	1,646	620		2,428
2008		104	1,013	404		1,521
2009		57	463	182		702
2010		50	452	171		673
2011		78	654	280		1,012
Total	0	1,191	11,849	4,125	0	17,165
Loan Amount (\$1,000s)						
2000		2,004	34,939	10,706		47,649
2001		2,686	36,792	14,312		53,790
2002		4,506	46,945	14,421		65,872
2003		6,610	44,115	12,514		63,239
2004		3,795	32,854	14,116		50,765
2005		4,982	41,689	11,106		57,777
2006		6,116	40,002	12,959		59,077
2007		4,607	42,041	13,784		60,432
2008		3,235	25,071	11,278		39,584
2009		2,386	15,816	6,654		24,856
2010		3,686	21,547	6,105		31,338
2011		2,487	21,876	8,463		32,826
Total	0	47,100	403,687	136,418	0	587,205

E. COMPLAINT DATA

This section contains data regarding fair housing complaints, as provided by the U.S. Department of Housing and Urban Development (HUD), the Ohio Civil Rights Commission (OCRC), and the Fair Housing Resource Center (FHRC).

HUD COMPLAINTS

Table 23.E.1
Fair Housing Complaints by Basis
23. Remainder of Lake County
2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color	1									1
Disability	6	10	12	1	13	5	8	6		61
Family Status	1	1	1	0	2	4	5	4	1	19
National Origin	1	1		1		2	1			6
Race	7	2	3	2	2	3	0	1	1	21
Sex			4				1	1	1	7
Total Bases	16	14	20	4	17	14	15	12	3	115
Total Complaints	14	13	17	3	17	13	11	10	3	101

Table 23.E.2
Fair Housing Complaints by Issue
23. Remainder of Lake County
2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Discrimination in terms, conditions or privileges relating to rental	3	5	3	3	4	5	5	4		32
Failure to make reasonable accommodation	5	4	11		3	2	3	2		30
Discriminatory advertisement - rental		1			1	0		1		3
False denial or representation of availability - rental	1	2								3
Discriminatory acts under Section 818 (coercion, etc.)	1		1				0		1	3
Discriminatory refusal to rent	5	5	7		3	2	4	2		28
Discrimination in the appraising of residential real property						2				2
Otherwise deny or make housing available							0	2		2
Discriminatory advertising, statements, and notices	1	1	0		5	4	5	2		18
Discriminatory terms, conditions, privileges, or services and facilities	1	2	1	0	3		3	4	1	15
Discriminatory refusal to rent and negotiate for rental		2	1		2	2		2	1	10
Discriminatory refusal to sell							1			1
Discriminatory refusal to negotiate for rental					1		0			1
Discrimination in the terms or conditions for making loans								1		1
Redlining - insurance					1					1
Other discriminatory acts							1			1
Restriction of choices relative to a rental			1							1
Use of discriminatory indicators	1									1
Total Issues	18	22	25	3	23	17	22	20	3	153
Total Complaints	14	13	17	3	17	13	11	10	3	101

Table 23.E.3
Fair Housing Complaints by Closure Status
 23. Remainder of Lake County
 2004–2012 HUD Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Administrative Closure Cause (FHAP)	1		1	1	1	2	1	1		8
Conciliated / Settled	4	4	4	0	8	4	8	3		35
No Cause	6	4	9	1	7	5	1	3		36
Open	3	5	3	1	1	2	1	3		19
								0	3	3
Total Complaints	14	13	17	3	17	13	11	10	3	101

HUD Complaints Found With Cause

Table 23.E.4
Fair Housing Complaints Found With Cause by Basis
 23. Remainder of Lake County
 2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability	6	6	10	1	13	4	7	4		51
Family Status	1	1	1	0	2	4	5	3		17
National Origin	1	1				1				3
Race	3	1	1			1	0			6
Sex			2				1	1		4
Total Bases	11	9	14	1	15	10	13	8		81
Total Complaints	10	8	13	1	15	9	9	6		71

Table 23.E.5
Fair Housing Complaints Found With Cause by Issue
 23. Remainder of Lake County
 2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Discriminatory refusal to rent and negotiate for rental					1		2	2		5
Discriminatory advertisement - rental				1			1	0	1	3
Failure to make reasonable accommodation			5	2	9		3	2	2	24
Discriminatory refusal to rent			3	3	6		2	2	4	22
Discrimination in terms, conditions or privileges relating to rental			2	3	3	1	4	2	4	22
False denial or representation of availability - rental				2						2
Discriminatory advertising, statements, and notices			1	1	0		5	4	5	18
Discriminatory terms, conditions, privileges, or services and facilities			1	2		0	3		3	11
Discriminatory refusal to negotiate for rental							1			1
Discrimination in the appraising of residential real property								1		1
Other discriminatory acts									1	1
Restriction of choices relative to a rental					1					1
Discriminatory acts under Section 818 (coercion, etc.)			1							1
Total Issues	13	14	20	1	21	13	19	11	0	112
Total Complaints	10	8	13	1	15	9	9	6		71

OHIO CIVIL RIGHTS COMMISSION COMPLAINTS

Table 23.E.6
Fair Housing Complaints by Basis
 23. Remainder of Lake County
 2004–2012 OCRC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color									1	1
Disability	5	8	11	2	9	3	7	5	2	52

Family Status	1	1	1	0	1	1	3	3		11
Gender			2		0	1		0	1	4
National Origin	1	1		2			0			4
Race	6	1	5	4	3	2	2	1	1	26
Retaliation				1		1	1	3	1	7
Total Bases	13	11	19	9	13	9	13	12	6	105
Total Complaints	12	11	17	5	13	8	10	9	2	87

Table 23.E.7
Fair Housing Complaints by Issue
 23. Remainder of Lake County
 2004–2012 OCRRC Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Advertising	1							1		2
Exclusion	2	6	1	1	5	2	2			19
Harassment	2	0				1				3
Other	4	7	7	3	3	2	5	6		37
Reasonable Accommodation	3	3	8	0	6	3	1	0	1	25
Terms and Conditions	3	2	2	2	3	2	2	2	1	19
Total Issues	15	18	18	6	17	10	10	9	2	105
Total Complaints	12	11	17	5	13	8	10	9	2	87

Table 23.E.8
Fair Housing Complaints by Closure Status
 23. Remainder of Lake County
 2004–2012 OCRRC Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Administrative Closure				0			1	0		1
CP Failed to Cooperate				1		1	1			3
CP Withdrawal – No Benefit			1		2			1	1	5
No Cause Finding Issued	1	5	4	2	1	1	1	3		18
No Jurisdiction							0		1	1
Open Charge Closed By Legal Activity		2	1							3
Settlement With Benefits	3	2	8	2	7	4	5	3		34
Successful Conciliation	1		1		2	1	1	1		7
Withdrawal With Benefits	7	2	2	0	1	1	1	1		15
Total Complaints	12	11	17	5	13	8	10	9	2	87

FAIR HOUSING RESOURCE CENTER COMPLAINTS

Table 23.E.11

Fair Housing Complaints by Basis

23. Remainder of Lake County
2004– 2012 FHRC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability	38	17	18	9	4	12	21	7	14	140
Family Status	4	9	3	1	2	2		2	1	24
National Origin	3		4					1		8
Race	15	4	6	2	4	2	5	4	2	44
Sex	1		3			1				5
Other	2	3	8	14	10	5	9	12	12	75
Total Bases	63	33	42	26	20	22	35	26	29	296
Total Complaints	63	33	42	26	20	22	34	23	28	291

Table 23.E.12

Fair Housing Complaints by Issue Type

23. Remainder of Lake County
2004– 2012 FHRC Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Rental	63	33	40	19	18	21	33	23	27	277
Advertising			2	7	2	1	1		1	14
Total	63	33	42	26	20	22	34	23	28	291

Table 23.E.13

Fair Housing Complaints by Closure Status

23. Remainder of Lake County
2004– 2012 FHRC Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Investigated and referred to HUD/OCRC	2	1				1	2	1		7
Investigated and settled		1								1
Settled through counseling	55	28	36	23	18	16	28	20	22	246
Complaint filed in federal court								1		19
Reasonable Accommodation Granted	5	3	3	3		4	5	2	6	31
Referred to OCRC	1		3		1					5
Total	63	33	42	26	20	22	34	23	28	291

F. FAIR HOUSING SURVEY FOR HOUSING STAKEHOLDERS DATA

This section presents public involvement data gathered through the 2012–2013 Fair Housing Survey for Housing Stakeholders.

Table 23.F.1

Primary Role of Respondent

23. Remainder of Lake County
2012–2013 Fair Housing Survey for Housing
Stakeholders Data

Primary Role	Total
Advocate/Service Provider	5
Construction/Development	1
Local Government	4
Other Role	1
Total	11

FEDERAL, STATE, AND LOCAL LAWS

Table 23.F.2
Familiarity with Fair Housing Laws

23. Remainder of Lake County
2012–2013 Fair Housing Survey
for Housing Stakeholders Data

Familiarity	Total
Not Familiar	0
Somewhat Familiar	5
Very Familiar	5
Missing	1
Total	11

Table 23.F.3
Perceptions About Fair Housing Laws

23. Remainder of Lake County
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?	10	0	0	1	11
Are fair housing laws difficult to understand or follow?	4	5	1	1	11
Do you think fair housing laws should be changed?	0	6	4	1	11
Do you think fair housing laws are adequately enforced?	9		1	1	11

Table 23.F.4
Fair Housing Activities

23. Remainder of Lake County
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?		9		1	1	11
Have you participated in fair housing training?		9	0	1	1	11
Are you aware of any fair housing testing?		6	3	1	1	11
Testing and education	Too Little	Right Amount	Too Much	Don't Know	Missing	Total
Is there sufficient outreach and education activity?	4	4	0	2	1	11
Is there sufficient testing?	1	1	2	6	1	11

Table 23.F.5
Protected Classes

23. Remainder of Lake County
2012–2013 Fair Housing Survey
for Housing Stakeholders Data

Protected Class	Total
Family Status	6
Gender	6
Religion	5
National Origin	4
Age	3
Sexual Orientation	2
Military	2
Disability	2
Color	1
Ancestry	1
Other	5
Total	37

Table 23.F.6

Fair Housing Violation Referrals
 23. Remainder of Lake County
 2012–2013 Fair Housing Survey for
 Housing Stakeholders Data

Referral	Total
Fair Housing Resource Center	1
OCRC	1
Other	1
Total	3

LOCAL FAIR HOUSING

Table 23.F.7

Local Fair Housing

23. Remainder of Lake County
 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?	4	4	0	3	11
Are there any specific geographic areas that have fair housing problems?	2	2	4	3	11
Are there any specific groups in that face housing discrimination?	2	3	3	3	11

FAIR HOUSING IN THE PRIVATE SECTOR

Table 23.F.8

Barriers to Fair Housing in the Private Sector

23. Remainder of Lake County
 2012–2013 Fair Housing Survey for Housing Stakeholders Data

Question	Yes	No	Don't Know	Missing	Total
Are you aware of any questionable practices or barriers to fair housing choice in:					
The rental housing market?	2	4	4	1	11
The real estate industry?	2	3	5	1	11
The mortgage and home lending industry?	1	4	5	1	11
The housing construction or accessible housing design fields?	1	5	4	1	11
The home insurance industry?	2	4	4	1	11
The home appraisal industry?		4	6	1	11
Any other housing services?	1	5	4	1	11

FAIR HOUSING IN THE PUBLIC SECTOR

Table 23.F.9
Barriers to Fair Housing in the Public Sector
 23. Remainder of Lake County
 2012–2013 Fair Housing Survey for Housing Stakeholders Data

Question	Yes	No	Don't Know	Missing	Total
Are you aware of any questionable practices or barriers to fair housing choice in:					
Land use policies?	1	5	3	2	11
Zoning laws?	2	4	3	2	11
Occupancy standards or health and safety codes?	1	5	3	2	11
Property tax policies?	0	3	6	2	11
Permitting process?		4	5	2	11
Housing construction standards?	0	4	5	2	11
Neighborhood or community development policies?	1	4	4	2	11
Limited access to government services, such as employment services?	1	5	2	3	11
Public administrative actions or regulations?	1	4	4	2	11

NARRATIVE COMMENTS

Federal, State, and Local Laws

Table 23.F.10
How did you become aware of fair housing laws?
 23. Remainder of Lake County
 2013 Fair Housing Survey Data

Comments:
Attended Fair Housing Commission meetings while working for a different county.
The housing authority works closely with it's local fair housing agency to serve tenants in common

Fair Housing in the Public Sector

Table 23.F.11
Are you aware of any barriers that limit access to government services, such as a lack of transportation or employment services?
 23. Remainder of Lake County
 2013 Fair Housing Survey Data

Comments:
lack of affordable public transportation

G. LAND USE PLANNING SURVEY DATA

This section contains data regarding the potential effects of local land use and housing policies on fair housing choice, as gathered from the Fair Housing Survey for Government Officials.

FAIR HOUSING SURVEY FOR GOVERNMENT OFFICIALS

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 was conducted predominately online. Respondents were solicited by mass-distributed emails sent by the NEOSCC, members of the Progress Review Team, and other various organizations in the 12-county region.

This section contains data gathered from the public sector staff in the Remainder of Lake County that received and completed the survey.⁹³

Table 23.G.1
Housing Development
 23. Remainder of Lake County
 2012 Fair Housing Survey for Government Officials Data

Question: Does your jurisdiction have...	Yes	No	Don't Know	Missing	Total
Housing Development					
Definitions for "dwelling unit" or "residential unit"?	7	0	1	5	13
Guidelines that encourage development affordable housing units?	0	7	1	5	13
Any potential barriers to the development of low- to moderate- income housing?	0	6	1	6	13
Guidelines that allow the development of mixed use housing?	6	1	1	5	13
Any potential barriers to the development of mixed use housing?	1	6	1	5	13
Occupancy Standards					
A definition for the term "family"?	1	2	0	3	6
Residential occupancy standards or limits?	1	2	0	3	6
Special Needs Housing					
A definition for the term "disability"?	0	1	0	5	6
Development standards for making housing accessible to persons with disabilities?	0	0	0	6	6
A process by which persons with disabilities can request modification to the jurisdiction's policies?	0	1	0	5	6
Standards for the development of senior housing?	0	1	0	5	6
Guidelines that distinguish senior citizen housing from other residential uses?	1	0	0	5	6
Guidelines for developing housing for any other special needs populations?	0	1	0	5	6
Fair Housing Policies					
A fair housing ordinance, policy, or regulation?	0	1	0	5	6
Policies or practices for "affirmatively furthering fair housing"?	0	1	0	5	6

H. IMPEDIMENTS

The 2013 *Northeast Ohio Regional Analysis of Impediments to Fair Housing Choice* uncovered several potential issues regarding fair housing in the Remainder of Lake County. Identification of these items as probable impediments to fair housing choice was based on HUD's definition of impediments as actions, omissions, or decisions that restrict housing choice due to protected class status or actions, omissions, or decisions that have this effect. The identified impediments are supported by evidence uncovered during the Regional AI process, with impediments of higher need being those identified in multiple sources.

These probable impediments in the entirety of the Northeast Ohio Region are presented in **Volumes I and II** of the Regional AI. They are accompanied by suggested actions that jurisdictions in the Region may implement in order to alleviate or eliminate these impediments, and are accompanied by measurable objectives. The goal of these actions and measurable objectives is to assist these agencies in offering greater housing choice for all citizens of the Northeast Ohio Region.

The following list presents the private and public sector impediments found in the Remainder of Lake County.

⁹³ For areas with both nonentitlement and entitlement communities, the results of the nonentitlement community government official survey and the entitlement community interviews were summed.

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 in the remainder of Lake County

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. This was also true in the remainder of Lake County.

Suggestion: Construct a regional 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, including the remainder of Lake County. 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 in the remainder of Lake County. 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:* 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 and exists in the remainder of Lake County.

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.

IMPEDIMENTS MATRIX

The matrix on the following page includes the impediment, data source, or sources that indicated its existence, protected classes most affected, and ranking of need for action. Level of need for action was determined based on the number of data sources that identified each impediment.

Table 23.H.1
Impediments Matrix
 23. Remainder of Lake County
 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 ⁹⁴		
Private Sector												
1	Denial of available housing units in the rental markets		X				X	X			Black and Hispanic persons	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			Black and Hispanic persons	M
10	Failure to comply with accessibility requirements in construction of housing units							X			Disabled persons	L
Public Sector												
1	Lack of sufficient fair housing policies or practices by several units of local government							X			All	L
2	Lack of sufficient fair housing outreach and education efforts							X		X	All	M
3	Land use and planning decisions and operational practices resulting in unequal access to government services such as transportation							X		X	All	M
4	Lack of inclusionary policies							X		X	All	M

⁹⁴ 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.

