

**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 2
FINAL REPORT
SEPTEMBER 20, 2013**

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**VOLUME III: TECHNICAL APPENDIX
PART 2**

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I. 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

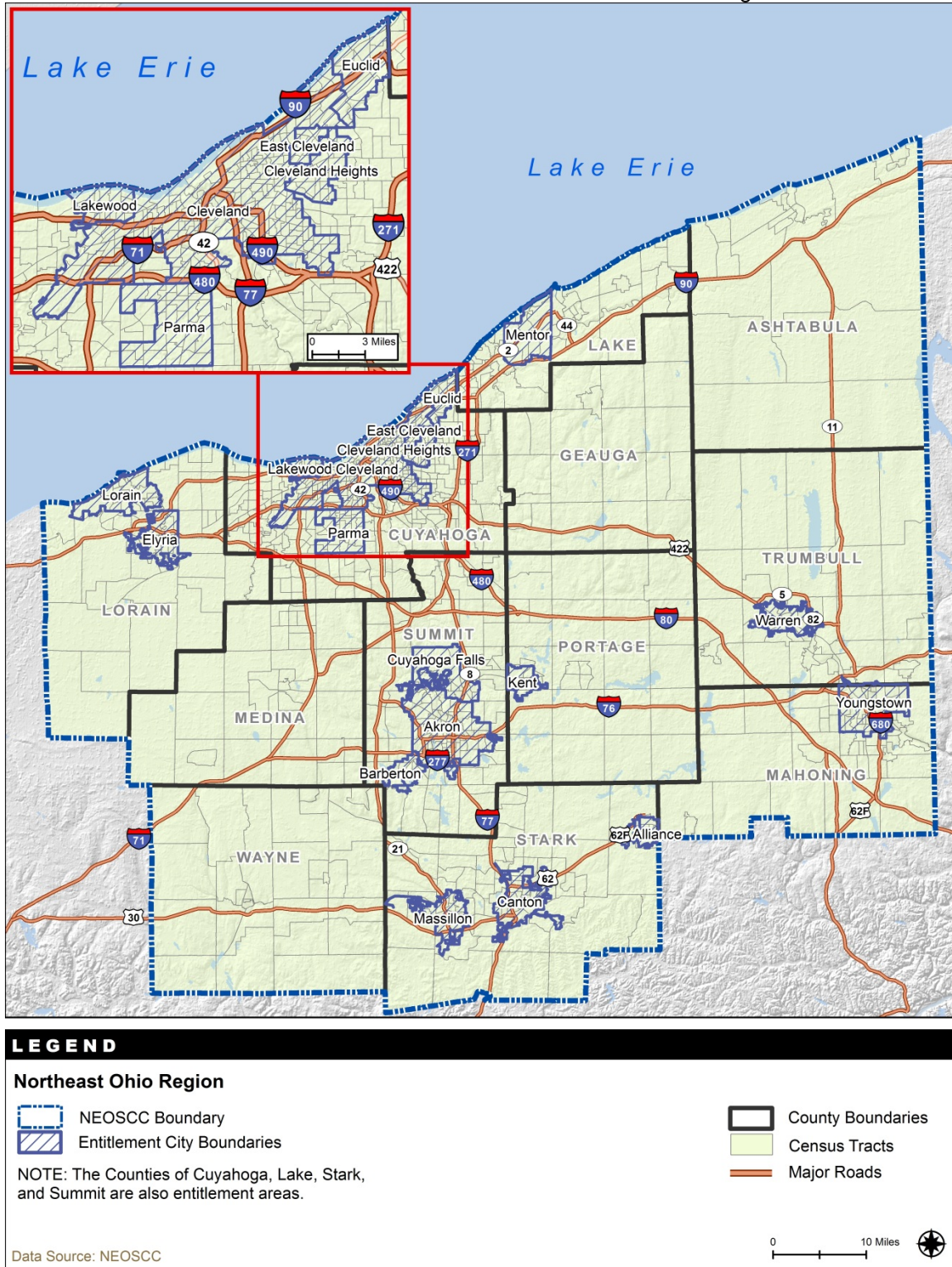


Exhibit III.1
Volume III Geographic Area Designations
 NEOSCC Region
 2013 NEOSCC Data

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.

24. LORAIN COUNTY

A. CENSUS BUREAU DATA

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

Table 24.A.1

Population by Age

24. Lorain County

2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Under 5	19,734	6.9%	18,037	6.0%	-8.6%
5 to 19	62,744	22.0%	62,386	20.7%	-.6%
20 to 24	16,846	5.9%	17,074	5.7%	1.4%
25 to 34	36,416	12.8%	33,625	11.2%	-7.7%
35 to 54	87,715	30.8%	87,535	29.0%	-.2%
55 to 64	25,626	9.0%	39,568	13.1%	54.4%
65 or Older	35,583	12.5%	43,131	14.3%	21.2%
Total	284,664	100.0%	301,356	100.0%	5.9%

Table 24.A.2

Elderly Population by Age

24. Lorain County

2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
65 to 66	4,007	11.3%	5,324	12.3%	32.9%
67 to 69	5,676	16.0%	7,562	17.5%	33.2%
70 to 74	9,240	26.0%	10,042	23.3%	8.7%
75 to 79	7,739	21.7%	7,737	17.9%	.0%
80 to 84	5,097	14.3%	6,470	15.0%	26.9%
85 or Older	3,824	10.7%	5,996	13.9%	56.8%
Total	35,583	100.0%	43,131	100.0%	21.2%

Table 24.A.3

Population by Race and Ethnicity

24. Lorain County

2000 & 2010 Census SF1 Data

Race	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
White	243,514	85.5%	255,410	84.8%	4.9%
Black	24,203	8.5%	25,799	8.6%	6.6%
American Indian	845	.3%	883	.3%	4.5%
Asian	1,703	.6%	2,811	.9%	65.1%
Native Hawaiian/ Pacific Islander	74	.0%	49	.0%	-33.8%
Other	8,160	2.9%	7,410	2.5%	-9.2%
Two or More Races	6,165	2.2%	8,994	3.0%	45.9%
Total	284,664	100.0%	301,356	100.0%	5.9%
Non-Hispanic	264,988	93.1	276,066	91.6%	4.2%
Hispanic	19,676	6.9%	25,290	8.4%	28.5%

Table 24.A.4
Disability by Age
 24. Lorain County
 2010 Three-Year ACS Data

Age	Male		Female		Total	
	Disabled Population	Disability Rate	Disabled Population	Disability Rate	Disabled Population	Disability Rate
Under 5	117	1.2%	97	1.1%	214	1.2%
5 to 17	2,370	8.6%	1,060	4.0%	3,430	6.3%
18 to 34	1,882	6.9%	2,141	7.4%	4,023	7.2%
35 to 64	8,138	13.6%	8,782	13.7%	16,920	13.6%
65 to 74	3,061	29.7%	2,477	20.8%	5,538	25.0%
75 or Older	3,424	48.7%	5,771	53.3%	9,195	51.5%
Total	18,992	13.4%	20,328	13.5%	39,320	13.4%

Table 24.A.5
Employment Status by Disability and Type: Age 18 to 64
 24. Lorain County
 2010 Three-Year ACS Data

Disability Status	Population
Employed:	129,194
With a disability:	8,524
With a hearing difficulty	1,882
With a vision difficulty	1,289
With a cognitive difficulty	2,659
With an ambulatory difficulty	3,706
With a self-care difficulty	567
With an independent living difficulty	1,738
No disability	120,670
Unemployed:	13,813
With a disability:	1,822
With a hearing difficulty	314
With a vision difficulty	327
With a cognitive difficulty	917
With an ambulatory difficulty	890
With a self-care difficulty	224
With an independent living difficulty	699
No disability	11,991
Not in labor force:	37,346
With a disability:	10,597
With a hearing difficulty	1,796
With a vision difficulty	1,673
With a cognitive difficulty	4,787
With an ambulatory difficulty	6,585
With a self-care difficulty	2,287
With an independent living difficulty	4,893
No disability	26,749
Total	180,353

Table 24.A.6
Households by Income

24. Lorain 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	13,560	12.8%	14,215	12.4%
\$15,000 to \$19,999	6,392	6.0%	5,768	5.0%
\$20,000 to \$24,999	6,600	6.2%	6,140	5.4%
\$25,000 to \$34,999	13,385	12.6%	12,090	10.6%
\$35,000 to \$49,999	18,511	17.5%	16,937	14.8%
\$50,000 to \$74,999	23,835	22.5%	23,425	20.5%
\$75,000 to \$99,999	12,217	11.5%	15,141	13.2%
\$100,000 or More	11,375	10.7%	20,763	18.1%
Total	105,875	100.0%	114,479	100.0%

Table 24.A.7
Poverty by Age

24. Lorain 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	3,914	15.8%	5,581	14.7%
6 to 17	5,883	23.7%	9,169	24.2%
18 to 64	12,760	51.4%	19,991	52.7%
65 or Older	2,252	9.1%	3,171	8.4%
Total	24,809	100.0%	37,912	100.0%
Poverty Rate	9.0%	.	13.1%	.

Table 24.A.8
Households by Year Home Built

24. Lorain 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	18,608	17.6%	17,939	15.7%
1940 to 1949	8,965	8.5%	7,052	6.2%
1950 to 1959	18,912	17.9%	19,407	17.0%
1960 to 1969	17,469	16.5%	15,902	13.9%
1970 to 1979	19,997	18.9%	18,879	16.5%
1980 to 1989	7,896	7.5%	7,508	6.6%
1990 to 1999	13,989	13.2%	13,313	11.6%
2000 to 2004	.	.	10,095	8.8%
2005 or Later	.	.	4,384	3.8%
Total	105,836	100.0%	114,479	100.0%

Table 24.A.9
Housing Units by Type

24. Lorain 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	87,221	78.3%	100,673	80.2%
Duplex	5,243	4.7%	5,068	4.0%
Tri- or Four-Plex	3,135	2.8%	3,536	2.8%
Apartment	12,279	11.0%	13,430	10.7%
Mobile Home	3,470	3.1%	2,839	2.3%
Boat, RV, Van, Etc.	20	.0%	0	.0%
Total	111,368	100.0%	125,546	100.0%

Table 24.A.10
Housing Units by Tenure

24. Lorain County
2000 & 2010 Census SF1 Data

Tenure	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
Occupied Housing Units	105,836	95.0%	116,274	91.5%	9.9%
Owner-Occupied	78,481	74.2%	84,746	72.9%	8.0%
Renter-Occupied	27,355	25.8%	31,528	27.1%	15.3%
Vacant Housing Units	5,532	5.0%	10,762	8.5%	94.5%
Total Housing Units	111,368	100.0%	127,036	100.0%	14.1%

Table 24.A.11
Disposition of Vacant Housing Units

24. Lorain County
2000 & 2010 Census SF1 Data

Disposition	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
For Rent	2,227	40.3%	4,173	38.8%	87.4%
For Sale	1,114	20.1%	2,110	19.6%	89.4%
Rented or Sold, Not Occupied	558	10.1%	756	7.0%	35.5%
For Seasonal, Recreational, or Occasional Use	396	7.2%	714	6.6%	80.3%
For Migrant Workers	1	0.0%	2	.0%	100.0%
Other Vacant	1,236	22.3%	3,007	27.9%	143.3%
Total	5,532	100.0%	10,762	100.0%	94.5%

Table 24.A.12
Households by Household Size

24. Lorain County
2000 & 2010 Census SF1 Data

Size	2000 Census		2010 Census		% Change 00-10
	Households	% of Total	Households	% of Total	
One Person	24,966	23.6%	30,248	26.0%	21.2%
Two Persons	35,206	33.3%	40,193	34.6%	14.2%
Three Persons	18,653	17.6%	19,125	16.4%	2.5%
Four Persons	16,051	15.2%	15,588	13.4%	-2.9%
Five Persons	7,228	6.8%	7,268	6.3%	.6%
Six Persons	2,478	2.3%	2,552	2.2%	3.0%
Seven Persons or More	1,254	1.2%	1,300	1.1%	3.7%
Total	105,836	100.0%	116,274	100.0%	9.9%

Table 24.A.13
Household Type by Tenure
 24. Lorain County
 2000 & 2010 Census SF1 Data

Household Type	2000 Census		2010 Census		% Change 00–10
	Households	% of Total	Households	% of Total	
Family Households	76,192	72.0%	80,077	68.9%	5.1%
Married-Couple Family	58,469	76.7%	58,748	73.4%	.5%
Owner-Occupied	51,690	88.4%	52,065	88.6%	.7%
Renter-Occupied	6,779	11.6%	6,683	11.4%	-1.4%
Other Family	17,723	23.3%	21,329	26.6%	20.3%
Male Householder, No Spouse	4,399	24.8%	5,574	26.1%	26.7%
Owner-Occupied	2,836	64.5%	3,456	62.0%	21.9%
Renter-Occupied	1,563	35.5%	2,118	38.0%	35.5%
Female Householder, No Spouse	13,324	75.2%	15,755	73.9%	18.2%
Owner-Occupied	6,742	50.6%	7,579	48.1%	12.4%
Renter-Occupied	6,582	49.4%	8,176	51.9%	24.2%
Non-Family Households	29,644	28.0%	36,197	31.1%	22.1%
Owner-Occupied	17,213	58.1%	21,646	59.8%	25.8%
Renter-Occupied	12,431	41.9%	14,551	40.2%	17.1%
Total	105,836	100.0%	116,274	100.0%	9.9%

Table 24.A.14
Group Quarters Population
 24. Lorain 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	4,099	67.7%	4,445	68.1%	8.4%
Juvenile Facilities	.	.	65	1.0%	.
Nursing Homes	1,857	30.7%	2,009	30.8%	8.2%
Other Institutions	102	1.7%	11	.2%	-89.2%
Total	6,058	100.0%	6,530	100.0%	7.8%
Noninstitutionalized					
College Dormitories	1,849	76.2%	2,198	78.4%	18.9%
Military Quarters	1	.0%	0	.0%	-100.0%
Other Noninstitutional	576	23.7%	604	21.6%	4.9%
Total	2,426	28.6%	2,802	30.0%	15.5%
Total Group Quarters Population	8,484	100.0%	9,332	100.0%	10.0%

Table 24.A.15
Overcrowding and Severe Overcrowding
 24. Lorain 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	77,730	99.1%	615	.8%	127	.2%	78,472
2010 ACS	84,501	99.5%	338	.4%	116	.1%	84,955
Renter							
2000 Census	26,220	95.8%	799	2.9%	345	1.3%	27,364
2010 ACS	28,737	97.3%	605	2.0%	182	.6%	29,524
Total							
2000 Census	103,950	98.2%	1,414	1.3%	472	.4%	105,836
2010 ACS	113,238	98.9%	943	.8%	298	.3%	114,479

Table 24.A.16
Households with Incomplete Plumbing Facilities
 24. Lorain County
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Plumbing Facilities	105,619	114,132
Lacking Complete Plumbing Facilities	217	347
Total Households	105,836	114,479
Percent Lacking	.2%	.3%

Table 24.A.17
Households with Incomplete Kitchen Facilities
 24. Lorain County
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Kitchen Facilities	105,513	113,616
Lacking Complete Kitchen Facilities	323	863
Total Households	105,836	114,479
Percent Lacking	.3%	.8%

Table 24.A.18
Cost Burden and Severe Cost Burden by Tenure
 24. Lorain 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	39,028	76.6%	8,197	16.1%	3,600	7.1%	101	.2%	50,926
2010 ACS	40,870	68.2%	12,554	20.9%	6,321	10.5%	221	.4%	59,966
Owner Without a Mortgage									
2000 Census	17,557	89.9%	1,192	6.1%	549	2.8%	242	1.2%	19,540
2010 ACS	21,456	85.9%	2,048	8.2%	1,367	5.5%	118	.5%	24,989
Renter									
2000 Census	15,658	57.8%	4,995	18.4%	4,377	16.2%	2,044	7.5%	27,074
2010 ACS	13,141	44.5%	5,815	19.7%	8,102	27.4%	2,466	8.4%	29,524
Total									
2000 Census	72,243	74.1%	14,384	14.7%	8,526	8.7%	2,387	2.4%	97,540
2010 ACS	75,467	65.9%	20,417	17.8%	15,790	13.8%	2,805	2.5%	114,479

Table 24.A.19
Median Housing Costs
 24. Lorain County
 2000 Census SF3 & 2010 Five-Year ACS Data

Housing Cost	2000 Census	2010 ACS
Median Contract Rent	\$435	\$538
Median Home Value	\$115,100	\$147,400

B. BEA DATA

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

Table 24.B.1
Employment by Industry
24. Lorain County
Select Years 2001–2010 BEA Data

NAICS Categories	2001	2005	2006	2007	2008	2009	2010	% Change 01–10
Farm employment	1,814	1,692	1,797	1,929	1,640	1,705	1,665	-8.2%
Forestry, fishing, related activities, and other	(D) ¹	(D)	(D)	(D)	(D)	(D)	163	.
Mining	(D)	(D)	(D)	(D)	(D)	(D)	120	.
Utilities	609	398	391	386	393	397	351	-42.4%
Construction	8,521	9,095	8,708	8,410	7,658	6,649	6,355	-25.4%
Manufacturing	26,562	21,690	20,661	20,158	19,585	16,461	16,076	-39.5%
Wholesale trade	3,105	3,329	3,450	3,448	3,475	3,330	3,370	8.5%
Retail trade	16,086	16,440	16,649	16,758	16,280	15,702	15,520	-3.5%
Transportation and warehousing	3,006	2,935	2,932	3,066	2,919	2,675	2,655	-11.7%
Information	1,821	1,667	1,664	1,601	1,348	1,217	1,168	-35.9%
Finance and insurance	3,107	3,289	3,305	3,507	3,712	4,127	4,304	38.5%
Real estate and rental and leasing	4,012	5,178	5,222	5,293	5,052	4,774	4,677	16.6%
Professional and technical services	4,040	4,510	4,712	5,083	5,054	4,909	4,759	17.8%
Management of companies and enterprises	401	447	778	792	883	803	902	124.9%
Administrative and waste services	5,792	6,734	6,937	6,785	7,829	7,548	7,414	28.0%
Educational services	2,896	3,341	3,494	3,630	3,671	3,789	3,893	34.4%
Health care and social assistance	13,261	13,830	14,106	14,265	14,588	14,578	14,824	11.8%
Arts, entertainment, and recreation	2,133	2,484	2,429	2,374	2,307	2,356	2,397	12.4%
Accommodation and food services	7,931	8,712	8,909	8,587	8,731	8,342	8,347	5.2%
Other services, except public administration	7,969	7,789	7,672	7,639	7,500	7,189	7,261	-8.9%
Government and government enterprises	16,032	16,560	16,775	16,630	16,547	16,648	16,541	3.2%
Total	129,315	130,358	130,831	130,606	129,455	123,459	122,762	-5.1%

¹ (D): These data are not shown to avoid disclosure of confidential information, but estimates are included in the totals.

Table 24.B.2
Real Earnings by Industry

24. Lorain County
 Select Years 2001–2010 BEA Data, Real 2011 Dollars

NAICS Categories	2001	2005	2006	2007	2008	2009	2010	% Change 00–10
Farm earnings	40,201	52,856	34,568	45,983	36,583	41,523	32,018	-20.4%
Forestry, fishing, related activities, and other	(D) ²	(D)	(D)	(D)	(D)	(D)	2,065	.
Mining	(D)	(D)	(D)	(D)	(D)	(D)	732	.
Utilities	50,480	38,191	38,533	36,923	40,589	41,503	37,471	-25.8%
Construction	416,027	417,698	391,631	346,276	314,391	266,121	257,093	-38.2%
Manufacturing	1,957,098	1,762,384	1,712,061	1,593,244	1,555,025	1,236,502	1,331,210	-32.0%
Wholesale trade	163,626	182,518	192,112	194,119	202,406	186,148	196,782	20.3%
Retail trade	445,169	452,836	450,781	442,568	427,942	427,424	428,179	-3.8%
Transportation and warehousing	128,678	130,734	127,544	130,250	124,926	105,774	102,919	-20.0%
Information	70,455	68,170	68,997	61,931	48,423	42,948	39,646	-43.7%
Finance and insurance	121,168	138,091	146,231	126,679	112,215	121,372	123,825	2.2%
Real estate and rental and leasing	66,774	61,640	56,002	47,013	58,351	62,313	56,499	-15.4%
Professional and technical services	153,365	172,385	176,078	197,342	209,494	192,902	188,322	22.8%
Management of companies and enterprises	38,536	33,607	72,519	76,215	82,049	84,840	95,685	148.3%
Administrative and waste services	153,195	182,742	185,749	183,383	203,746	195,528	192,821	25.9%
Educational services	105,156	116,314	116,885	121,058	124,771	131,810	132,866	26.4%
Health care and social assistance	568,309	641,823	644,051	634,000	642,078	648,051	671,042	18.1%
Arts, entertainment, and recreation	30,030	31,310	29,951	27,082	25,261	25,742	25,730	-14.3%
Accommodation and food services	125,833	143,240	142,078	144,304	143,898	136,044	139,644	11.0%
Other services, except public administration	259,702	235,649	230,179	228,824	215,615	205,613	218,130	-16.0%
Government and government enterprises	932,988	1,023,336	1,014,763	1,001,403	1,012,471	1,028,016	1,033,821	10.8%
Total	5,830,736	5,892,447	5,838,430	5,646,251	5,584,413	5,182,495	5,306,498	-9.0%

² (D): These data are not shown to avoid disclosure of confidential information, but estimates are included in the totals.

Table 24.B.3
Real Earnings Per Job by Industry
 24. Lorain 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	22,161	31,239	19,237	23,838	22,307	24,354	19,230	-13.2%
Forestry, fishing, related activities, and other	(D) ³	(D)	(D)	(D)	(D)	(D)	12,670	.
Mining	(D)	(D)	(D)	(D)	(D)	(D)	6,103	.
Utilities	82,890	95,958	98,551	95,654	103,280	104,541	106,755	28.8%
Construction	48,824	45,926	44,974	41,174	41,054	40,024	40,455	-17.1%
Manufacturing	73,680	81,253	82,864	79,038	79,399	75,117	82,807	12.4%
Wholesale trade	52,698	54,827	55,685	56,299	58,246	55,900	58,392	10.8%
Retail trade	27,674	27,545	27,076	26,409	26,286	27,221	27,589	-.3%
Transportation and warehousing	42,807	44,543	43,501	42,482	42,797	39,542	38,764	-9.4%
Information	38,690	40,894	41,464	38,683	35,922	35,290	33,943	-12.3%
Finance and insurance	38,998	41,986	44,245	36,122	30,230	29,409	28,770	-26.2%
Real estate and rental and leasing	16,644	11,904	10,724	8,882	11,550	13,053	12,080	-27.4%
Professional and technical services	37,962	38,223	37,368	38,824	41,451	39,296	39,572	4.2%
Management of companies and enterprises	96,100	75,183	93,213	96,232	92,921	105,654	106,080	10.4%
Administrative and waste services	26,449	27,137	26,777	27,028	26,025	25,905	26,008	-1.7%
Educational services	36,311	34,814	33,453	33,349	33,988	34,788	34,129	-6.0%
Health care and social assistance	42,856	46,408	45,658	44,444	44,014	44,454	45,267	5.6%
Arts, entertainment, and recreation	14,079	12,605	12,331	11,408	10,950	10,926	10,734	-23.8%
Accommodation and food services	15,866	16,442	15,948	16,805	16,481	16,308	16,730	5.4%
Other services, except public administration	32,589	30,254	30,002	29,955	28,749	28,601	30,041	-7.8%
Government and government enterprises	58,195	61,796	60,493	60,217	61,188	61,750	62,500	7.4%
Average	45,090	45,202	44,626	43,232	43,138	41,978	43,226	-4.13%

³ (D): These data are not shown to avoid disclosure of confidential information, but estimates are included in the totals.

Table 24.B.4
Total Employment and Real Personal Income
 24. Lorain 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	3,656,144	244,119	467,075	458,014	284,165	4,621,279	18,187	93,980	38,903
1970	3,601,636	235,609	429,158	477,245	319,402	4,591,833	17,853	94,671	38,045
1971	3,831,663	256,156	415,688	493,485	372,094	4,856,774	18,743	96,259	39,805
1972	3,946,364	280,283	458,343	504,730	390,170	5,019,323	19,251	97,482	40,485
1973	4,257,484	352,762	495,858	523,610	428,089	5,352,278	20,210	103,247	41,237
1974	4,276,111	366,054	518,893	545,839	471,783	5,446,573	20,316	105,007	40,724
1975	4,068,128	337,670	487,063	540,617	570,352	5,328,490	19,843	101,424	40,109
1976	4,291,323	359,539	538,582	550,547	571,117	5,592,030	21,093	102,609	41,822
1977	4,778,618	402,019	558,422	580,852	555,566	6,071,440	22,409	107,928	44,276
1978	4,920,378	430,169	618,853	618,951	557,811	6,285,823	22,787	111,634	44,077
1979	4,894,292	441,142	642,732	658,914	617,561	6,372,357	23,344	112,085	43,667
1980	4,428,584	389,575	669,485	757,980	835,097	6,301,570	22,942	105,046	42,158
1981	4,435,217	423,227	672,142	850,949	761,900	6,296,981	23,052	103,360	42,911
1982	3,869,535	372,984	727,230	920,150	889,217	6,033,148	22,196	95,631	40,464
1983	3,999,180	396,345	713,723	947,034	877,173	6,140,766	22,776	96,321	41,518
1984	4,180,284	425,045	783,360	1,064,362	849,712	6,452,672	24,013	98,932	42,254
1985	4,335,996	448,077	829,109	1,087,332	879,057	6,683,417	24,910	100,689	43,063
1986	4,290,927	459,862	886,730	1,098,298	933,148	6,749,242	25,240	102,502	41,861
1987	4,390,188	474,966	923,590	1,100,595	936,234	6,875,641	25,661	106,543	41,205
1988	4,732,400	523,164	961,675	1,110,703	942,924	7,224,538	26,914	109,704	43,137
1989	4,585,205	514,612	1,041,570	1,223,035	961,854	7,297,052	27,004	110,733	41,408
1990	4,498,906	515,497	1,097,897	1,222,605	1,023,920	7,327,831	26,970	111,800	40,240
1991	4,458,709	517,907	1,057,399	1,178,158	1,090,709	7,267,068	26,533	111,139	40,118
1992	4,793,320	558,926	978,446	1,149,823	1,179,401	7,542,064	27,309	113,384	42,275
1993	5,024,006	598,573	941,635	1,159,802	1,185,010	7,711,880	27,731	117,301	42,831
1994	5,279,470	629,600	1,034,360	1,218,860	1,212,968	8,116,059	29,011	120,943	43,653
1995	5,315,676	633,521	1,106,173	1,301,119	1,260,834	8,350,282	29,708	123,997	42,870
1996	5,348,663	631,045	1,166,891	1,366,868	1,284,724	8,536,101	30,235	125,805	42,515
1997	5,314,860	611,595	1,336,535	1,513,805	1,303,937	8,857,542	31,242	126,136	42,136
1998	5,653,737	619,574	1,309,087	1,602,917	1,311,315	9,257,483	32,662	125,068	45,206
1999	5,799,014	634,765	1,467,637	1,577,916	1,341,870	9,551,673	33,709	127,631	45,436
2000	5,953,808	632,632	1,529,932	1,625,436	1,409,618	9,886,162	34,677	131,509	45,273
2001	5,830,736	629,905	1,579,224	1,488,492	1,522,362	9,790,910	34,254	129,315	45,090
2002	5,656,262	591,138	1,586,843	1,374,054	1,610,354	9,636,375	33,519	126,733	44,631
2003	5,883,276	610,743	1,607,615	1,338,199	1,668,194	9,886,542	34,019	127,705	46,069
2004	5,953,355	640,710	1,680,740	1,233,787	1,703,766	9,930,938	33,996	129,700	45,901
2005	5,892,447	640,131	1,758,587	1,272,445	1,758,574	10,041,922	34,055	130,358	45,202
2006	5,838,430	644,953	1,897,989	1,342,273	1,824,665	10,258,405	34,510	130,831	44,626
2007	5,646,251	627,156	2,001,745	1,491,773	1,881,338	10,393,951	34,807	130,606	43,232
2008	5,584,413	633,275	2,018,424	1,645,159	2,020,767	10,635,488	35,473	129,455	43,138
2009	5,182,495	600,915	1,969,364	1,551,994	2,273,317	10,376,255	34,485	123,459	41,978
2010	5,306,498	610,739	2,071,847	1,548,683	2,348,261	10,664,550	35,368	122,762	43,226

C. BLS DATA

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

Table 24.C.1
Labor Force Statistics
 24. Lorain County
 1990–2011 BLS Data

Year	Labor Force	Employment	Unemployment	Unemployment Rate	Statewide Unemployment Rate
1990	135,349	124,534	10,815	8.0%	5.7%
1991	134,759	121,704	13,055	9.7%	6.6%
1992	135,550	122,672	12,878	9.5%	7.4%
1993	135,278	125,566	9,712	7.2%	6.7%
1994	138,271	128,976	9,295	6.7%	5.6%
1995	140,223	130,504	9,719	6.9%	4.9%
1996	141,422	132,921	8,501	6.0%	5.0%
1997	143,859	135,859	8,000	5.6%	4.6%
1998	144,921	137,849	7,072	4.9%	4.3%
1999	146,518	139,862	6,656	4.5%	4.3%
2000	148,876	142,708	6,168	4.1%	4.0%
2001	150,276	142,898	7,378	4.9%	4.4%
2002	150,566	142,098	8,468	5.6%	5.7%
2003	152,524	143,080	9,444	6.2%	6.2%
2004	152,273	143,286	8,987	5.9%	6.1%
2005	153,676	144,734	8,942	5.8%	5.9%
2006	158,200	148,899	9,301	5.9%	5.4%
2007	160,565	150,386	10,179	6.3%	5.6%
2008	162,428	150,774	11,654	7.2%	6.5%
2009	161,485	145,623	15,862	9.8%	10.1%
2010	158,977	144,279	14,698	9.2%	10.0%
2011	158,978	146,187	12,791	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.⁴ The information presented in this section presents detailed HMDA data, including denial rates and predatory lending including high annual percentage rate (APR) loans.

Table 24.D.1
Purpose of Loan by Year
24. Lorain County
2004–2011 HMDA Data

Purpose	2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	11,079	12,056	10,853	7,127	5,472	5,075	4,503	4,127	60,292
Home Improvement	2,021	2,726	2,513	2,011	1,631	945	696	650	13,193
Refinancing	19,104	19,195	15,772	11,137	7,542	10,330	9,305	8,189	100,574
Total	32,204	33,977	29,138	20,275	14,645	16,350	14,504	12,966	174,059

Table 24.D.2
Occupancy Status for Home Purchase Loan Applications
24. Lorain County
2004–2011 HMDA Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	Total
Owner-Occupied	10,197	11,076	9,842	6,498	5,063	4,783	4,289	3,887	55,635
Not Owner-Occupied	806	940	990	606	405	290	208	236	4,481
Not Applicable	76	40	21	23	4	2	6	4	176
Total	11,079	12,056	10,853	7,127	5,472	5,075	4,503	4,127	60,292

Table 24.D.3
Owner-Occupied Home Purchase Loan Applications by Loan Type
24. Lorain County
2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Conventional	8,506	9,508	8,678	5,436	2,661	1,796	1,683	1,631	39,899
FHA - Insured	1,486	1,364	985	895	2,149	2,613	2,287	1,917	13,696
VA - Guaranteed	199	198	174	157	244	316	290	279	1,857
Rural Housing Service or Farm Service Agency	6	6	5	10	9	58	29	60	183
Total	10,197	11,076	9,842	6,498	5,063	4,783	4,289	3,887	55,635

⁴ 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 24.D.4
Loan Applications by Action Taken
 24. Lorain County
 2004–2011 HMDA Data

Action	2004	2005	2006	2007	2008	2009	2010	2011	Total
Loan Originated	5,683	6,094	5,049	3,452	2,722	2,424	2,154	1,977	29,555
Application Approved but not Accepted	574	653	603	317	205	114	94	98	2,658
Application Denied	878	1,089	1,033	648	470	304	339	259	5,020
Application Withdrawn by Applicant	596	681	544	270	228	235	198	162	2,914
File Closed for Incompleteness	202	187	164	118	39	46	49	39	844
Loan Purchased by the Institution	2,264	2,359	2,446	1,683	1,393	1,660	1,455	1,352	14,612
Preapproval Request Denied	0	13	3	10	6	0	0	0	32
Preapproval Approved but not Accepted	0	0	0	0	0	0	0	0	0
Total	10,197	11,076	9,842	6,498	5,063	4,783	4,289	3,887	55,635
Denial Rate	13.4%	15.2%	17.0%	15.8%	14.7%	11.1%	13.6%	11.6%	14.5%

Table 24.D.5
Denial Rates by Gender of Applicant
 24. Lorain County
 2004–2011 HMDA Data

Year	Male	Female	Not Available	Not Applicable	Average
2004	11.4%	16.3%	38.1%	.0%	13.4%
2005	13.4%	16.5%	42.9%	60.0%	15.2%
2006	14.7%	20.7%	32.4%	%	17.0%
2007	13.8%	18.4%	35.8%	33.3%	15.8%
2008	14.2%	15.0%	26.3%	%	14.7%
2009	10.2%	13.0%	15.1%	.0%	11.1%
2010	12.1%	15.8%	26.0%	%	13.6%
2011	10.8%	12.4%	21.3%	%	11.6%
Average	12.9%	16.7%	33.2%	40.0%	14.5%

Table 24.D.6
Loan Applications by Selected Action Taken by Gender of Applicant
 24. Lorain County
 2004–2011 HMDA Data

Gender		2004	2005	2006	2007	2008	2009	2010	2011	Total
Male	Originated	4,063	4,337	3,503	2,409	1,851	1,665	1,506	1,353	20,687
	Denied	525	670	604	386	306	189	208	163	3,051
	Denial Rate	11.4%	13.4%	14.7%	13.8%	14.2%	10.2%	12.1%	10.8%	12.9%
Female	Originated	1,528	1,631	1,425	962	812	713	591	565	8,227
	Denied	297	323	371	217	143	107	111	80	1,649
	Denial Rate	16.3%	16.5%	20.7%	18.4%	15.0%	13.0%	15.8%	12.4%	16.7%
Not Available	Originated	91	124	121	79	59	45	57	59	635
	Denied	56	93	58	44	21	8	20	16	316
	Denial Rate	38.1%	42.9%	32.4%	35.8%	26.3%	15.1%	26.0%	21.3%	33.2%
Not Applicable	Originated	1	2	0	2	0	1	0	0	6
	Denied	0	3	0	1	0	0	0	0	4
	Denial Rate	.0%	60.0%	%	33.3%	%	.0%	%	%	40.0%
Total	Originated	5,683	6,094	5,049	3,452	2,722	2,424	2,154	1,977	29,555
	Denied	878	1,089	1,033	648	470	304	339	259	5,020
	Denial Rate	13.4%	15.2%	17.0%	15.8%	14.7%	11.1%	13.6%	11.6%	14.5%

Table 24.D.7
Denial Rates by Race/Ethnicity of Applicant
 24. Lorain County
 2004–2011 HMDA Data

Race/Ethnicity	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	21.4%	28.6%	47.1%	37.5%	11.1%	.0%	37.5%	42.9%	29.1%
Asian	7.2%	8.7%	17.8%	17.4%	19.1%	15.0%	9.7%	15.4%	13.1%
Black	23.4%	25.2%	32.4%	29.3%	22.4%	18.3%	24.1%	16.7%	25.8%
White	11.7%	13.3%	14.3%	14.1%	13.7%	10.7%	12.7%	10.8%	12.9%
Not Available	31.8%	28.9%	39.2%	33.3%	27.3%	16.1%	21.0%	17.3%	29.6%
Not Applicable	11.5%	60.0%	.0%	33.3%	%	0.0%	0%	%	19.4%
Average	13.4%	15.2%	17.0%	15.8%	14.7%	11.1%	13.6%	11.6%	14.5%
Non-Hispanic	12.5%	13.7%	15.1%	14.1%	13.9%	10.5%	12.7%	10.9%	13.3%
Hispanic	20.4%	19.2%	21.3%	27.5%	17.2%	15.1%	16.5%	9.8%	19.8%

Table 24.D.8
Loan Applications by Selected Action Taken by Race/Ethnicity of Applicant
 24. Lorain County
 2004–2011 HMDA Data

Race		2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Originated	11	10	9	5	8	9	5	4	61
	Denied	3	4	8	3	1	0	3	3	25
	Denial Rate	21.4%	28.6%	47.1%	37.5%	11.1%	37.5%	37.5%	42.9%	29.1%
Asian	Originated	90	84	83	38	38	34	28	22	417
	Denied	7	8	18	8	9	6	3	4	63
	Denial Rate	7.2%	8.7%	17.8%	17.4%	19.1%	15.0%	9.7%	15.4%	13.1%
Black	Originated	200	252	223	111	97	67	63	60	1,073
	Denied	61	85	107	46	28	15	20	12	374
	Denial Rate	23.4%	25.2%	32.4%	29.3%	22.4%	18.3%	24.1%	16.7%	25.8%
White	Originated	5,086	5,327	4,503	3,146	2,467	2,219	1,949	1,776	26,473
	Denied	677	819	752	515	390	265	284	216	3,918
	Denial Rate	11.7%	13.3%	14.3%	14.1%	13.7%	10.7%	12.7%	10.8%	12.9%
Not Available	Originated	273	419	230	150	112	94	109	115	1,502
	Denied	127	170	148	75	42	18	29	24	633
	Denial Rate	31.8%	28.9%	39.2%	33.3%	27.3%	16.1%	21.0%	17.3%	29.6%
Not Applicable	Originated	23	2	1	2	0	1	0	0	29
	Denied	3	3	0	1	0	0	0	0	7
	Denial Rate	31.8%	28.9%	39.2%	33.3%	27.3%	16.1%	21.0%	17.3%	19.4%
Total	Originated	5,683	6,094	5,049	3,452	2,722	2,424	2,154	1,977	29,555
	Denied	878	1,089	1,033	648	470	304	339	259	5,020
	Denial Rate	13.4%	15.2%	17.0%	15.8%	14.7%	11.1%	13.6%	11.6%	14.5%
Non-Hispanic	Originated	4,550	5,395	4,572	3,144	2,486	2,222	1,979	1,805	26,153
	Denied	650	856	814	514	402	260	288	220	4,004
	Denial Rate	12.5%	13.7%	15.1%	14.1%	13.9%	10.5%	12.7%	10.9%	13.3%
Hispanic	Originated	249	248	247	158	125	107	81	83	1,298
	Denied	64	59	67	60	26	19	16	9	320
	Denial Rate	20.4%	19.2%	21.3%	27.5%	17.2%	15.1%	16.5%	9.8%	19.8%

Table 24.D.9
Loan Applications by Reason for Denial
 24. Lorain County
 2004–2011 HMDA Data

Denial Reason	2004	2005	2006	2007	2008	2009	2010	2011	Total
Debt-to-Income Ratio	104	145	132	126	100	69	89	57	822
Employment History	10	10	24	13	9	3	11	3	83
Credit History	215	231	198	156	107	78	82	71	1,138
Collateral	55	88	77	53	85	50	63	43	514
Insufficient Cash	18	23	27	15	8	5	9	10	115
Unverifiable Information	29	35	37	27	26	10	9	7	180
Credit Application Incomplete	70	81	59	55	24	10	11	23	333
Mortgage Insurance Denied	0	3	0	0	3	4	2	0	12
Other	180	237	171	65	30	31	26	20	760
Missing	197	236	308	138	78	44	37	25	1,063
Total	878	1,089	1,033	648	470	304	339	259	5,020

Table 24.D.10
Denial Rates by Income of Applicant
 24. Lorain County
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	37.3%	41.5%	33.3%	57.1%	52.4%	47.4%	42.9%	33.3%	41.8%
\$15,001–\$30,000	22.8%	27.1%	34.0%	28.3%	24.1%	17.7%	21.7%	19.4%	25.5%
\$30,001–\$45,000	16.9%	18.3%	23.0%	18.9%	15.3%	9.7%	15.7%	11.5%	17.3%
\$45,001–\$60,000	14.2%	14.4%	19.5%	16.1%	14.6%	12.3%	13.3%	12.1%	15.1%
\$60,001–\$75,000	9.3%	11.3%	12.4%	14.9%	12.8%	12.5%	11.2%	12.3%	11.8%
Above \$75,000	6.3%	9.1%	8.1%	8.9%	10.9%	5.5%	8.4%	7.5%	8.1%
Data Missing	19.9%	21.2%	9.9%	21.3%	9.1%	28.6%	39.3%	27.6%	18.1%
Total	13.4%	15.2%	17.0%	15.8%	14.7%	11.1%	13.6%	11.6%	14.5%

Table 24.D.11
Denial Rates of Loans by Race/Ethnicity and Income of Applicant
 24. Lorain County
 2004–2011 HMDA Data

Race	<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	Above \$75K	Data Missing	Average
American Indian	.0%	50.0%	35.7%	30.8%	28.6%	23.5%	.0%	29.1%
Asian	40.0%	37.5%	13.2%	22.8%	9.4%	6.8%	9.1%	13.1%
Black	75.0%	31.3%	28.5%	27.9%	16.1%	19.3%	25.8%	25.8%
White	41.6%	23.4%	15.2%	13.3%	11.0%	7.3%	13.8%	12.9%
Not Available	35.9%	44.8%	35.2%	32.2%	21.8%	16.1%	53.9%	29.6%
Not Applicable	.0%	14.3%	25.0%	50.0%	.0%	.0%	33.3%	19.4%
Average	41.8%	25.5%	17.3%	15.1%	11.8%	8.1%	18.1%	14.5%
Non-Hispanic Ethnicity	40.8%	23.8%	15.7%	14.3%	11.1%	7.5%	14.4%	13.3%
Hispanic (Ethnicity)	51.9%	28.0%	22.9%	13.7%	15.1%	10.9%	18.6%	19.8%

Table 24.D.12
Loan Applications by Reason for Denial by Race/Ethnicity of Applicant
 24. Lorain County
 2004–2011 HMDA Data

Denial Reason	American Indian	Asian	Black	White	Not Available	Not Applicable	Total	Hispanic (Ethnicity)
Debt-to-Income Ratio	2	12	63	666	78	1	822	58
Employment History	1	2	4	70	6	0	83	7
Credit History	7	18	89	900	124	0	1,138	70
Collateral	4	6	20	436	46	2	514	25
Insufficient Cash	1	2	3	102	7	0	115	7
Unverifiable Information	0	2	21	136	19	2	180	11
Credit Application Incomplete	1	4	20	271	37	0	333	22
Mortgage Insurance Denied	0	0	0	12	0	0	12	2
Other	2	12	70	587	89	0	760	50
Missing	7	5	84	738	227	2	1,063	68
Total	25	63	374	3,918	633	7	5,020	320
% Missing	28.0%	7.9%	22.5%	18.8%	35.9%	28.6%	21.2%	21.3%

Table 24.D.13
Loan Applications by Income of Applicant: Originated and Denied
 24. Lorain County
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Loan Originated	32	24	36	12	10	20	16	16	166
	Application Denied	19	17	18	16	11	18	12	8	119
	Denial Rate	37.3%	41.5%	33.3%	57.1%	52.4%	47.4%	42.9%	33.3%	41.8%
\$15,001–\$30,000	Loan Originated	589	628	447	360	315	321	263	203	3,126
	Application Denied	174	234	230	142	100	69	73	49	1,071
	Denial Rate	22.8%	27.1%	34.0%	28.3%	24.1%	17.7%	21.7%	19.4%	25.5%
\$30,001–\$45,000	Loan Originated	1,263	1,217	949	629	532	524	419	406	5,939
	Application Denied	256	273	283	147	96	56	78	53	1,242
	Denial Rate	16.9%	18.3%	23.0%	18.9%	15.3%	9.7%	15.7%	11.5%	17.3%
\$45,001–\$60,000	Loan Originated	1,035	1,282	922	615	548	419	377	355	5,553
	Application Denied	171	216	224	118	94	59	58	49	989
	Denial Rate	14.2%	14.4%	19.5%	16.1%	14.6%	12.3%	13.3%	12.1%	15.1%
\$60,001–\$75,000	Loan Originated	805	875	663	461	375	342	286	222	4,029
	Application Denied	83	111	94	81	55	49	36	31	540
	Denial Rate	9.3%	11.3%	12.4%	14.9%	12.8%	12.5%	11.2%	12.3%	11.8%
Above \$75,000	Loan Originated	1,726	1,878	1,768	1,316	912	778	776	754	9,908
	Application Denied	117	187	155	128	111	45	71	61	875
	Denial Rate	6.3%	9.1%	8.1%	8.9%	10.9%	5.5%	8.4%	7.5%	8.1%
Data Missing	Loan Originated	233	190	264	59	30	20	17	21	834
	Application Denied	58	51	29	16	3	8	11	8	184
	Denial Rate	19.9%	21.2%	9.9%	21.3%	9.1%	28.6%	39.3%	27.6%	18.1%
Total	Loan Originated	5,683	6,094	5,049	3,452	2,722	2,424	2,154	1,977	29,555
	Application Denied	878	1,089	1,033	648	470	304	339	259	5,020
	Denial Rate	13.4%	15.2%	17.0%	15.8%	14.7%	11.1%	13.6%	11.6%	14.5%

Table 24.D.14
Loan Applications by Income and Race/Ethnicity of Applicant: Originated and Denied
 24. Lorain County
 2004–2011 HMDA Data

Race		<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	> \$75K	Data Missing	Total
American Indian	Loan Originated	2	4	9	9	10	26	1	61
	Application Denied	0	4	5	4	4	8	0	25
	Denial Rate	.0%	50.0%	35.7%	30.8%	28.6%	23.5%	.0%	29.1%
Asian	Loan Originated	3	15	59	71	48	191	30	417
	Application Denied	2	9	9	21	5	14	3	63
	Denial Rate	40.0%	37.5%	13.2%	22.8%	9.4%	6.8%	9.1%	13.1%
Black	Loan Originated	3	191	274	207	187	188	23	1,073
	Application Denied	9	87	109	80	36	45	8	374
	Denial Rate	75.0%	31.3%	28.5%	27.9%	16.1%	19.3%	25.8%	25.8%
White	Loan Originated	132	2,752	5,284	5,025	3,596	8,953	731	26,473
	Application Denied	94	842	950	768	443	704	117	3,918
	Denial Rate	41.6%	23.4%	15.2%	13.3%	11.0%	7.3%	13.8%	12.9%
Not Available	Loan Originated	25	158	307	238	186	541	47	1,502
	Application Denied	14	128	167	113	52	104	55	633
	Denial Rate	35.9%	44.8%	35.2%	32.2%	21.8%	16.1%	53.9%	29.6%
Not Applicable	Loan Originated	1	6	6	3	2	9	2	29
	Application Denied	0	1	2	3	0	0	1	7
	Denial Rate	.0%	14.3%	25.0%	50.0%	.0%	.0%	33.3%	19.4%
Total	Loan Originated	166	3,126	5,939	5,553	4,029	9,908	834	29,555
	Application Denied	119	1,071	1,242	989	540	875	184	5,020
	Denial Rate	41.8%	25.5%	17.3%	15.1%	11.8%	8.1%	18.1%	14.5%
Non-Hispanic Ethnicity	Loan Originated	129	2,675	5,243	4,940	3,594	8,865	707	26,153
	Application Denied	89	834	975	822	447	718	119	4,004
	Denial Rate	40.8%	23.8%	15.7%	14.3%	11.1%	7.5%	14.4%	13.3%
Hispanic (Ethnicity)	Loan Originated	13	265	324	265	152	244	35	1,298
	Application Denied	14	103	96	42	27	30	8	320
	Denial Rate	51.9%	28.0%	22.9%	13.7%	15.1%	10.9%	18.6%	19.8%

PREDATORY LENDING

Table 24.D.15
Originated Owner-Occupied Loans by HAL Status
 24. Lorain County
 2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Other	4,992	4,671	3,912	3,044	2,458	2,251	2,122	1,952	25,402
HAL	691	1,423	1,137	408	264	173	32	25	4,153
Total	5,683	6,094	5,049	3,452	2,722	2,424	2,154	1,977	29,555
Percent HAL	12.2%	23.4%	22.5%	11.8%	9.7%	7.1%	1.5%	1.3%	14.1%

Table 24.D.16
Loans by Loan Purpose by HAL Status
 24. Lorain County
 2004–2011 HMDA Data

Loan Purpose		2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	Other	4,992	4,671	3,912	3,044	2,458	2,251	2,122	1,952	25,402
	HAL	691	1,423	1,137	408	264	173	32	25	4,153
	Percent HAL	12.2%	23.4%	22.5%	11.8%	9.7%	7.1%	1.5%	1.3%	14.1%
Home Improvement	Other	458	653	649	592	533	304	255	252	3,696
	HAL	167	236	229	122	52	37	20	16	879
	Percent HAL	26.7%	26.5%	26.1%	17.1%	8.9%	10.9%	7.3%	6.0%	19.2%
Refinancing	Other	5,276	4,157	3,275	2,689	2,332	4,449	4,363	3,837	30,378
	HAL	1,192	1,838	1,571	658	314	217	25	34	5,849
	Percent HAL	18.4%	30.7%	32.4%	19.7%	11.9%	4.7%	.6%	.9%	16.1%
Total	Other	10,726	9,481	7,836	6,325	5,323	7,004	6,740	6,041	59,476
	HAL	2,050	3,497	2,937	1,188	264	173	32	25	10,881
	Percent HAL	16.0%	26.9%	27.3%	15.8%	10.6%	5.7%	1.1%	1.2%	15.5%

Table 24.D.17
HALs Originated by Race of Borrower
 24. Lorain County
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	2	1	1	1	1	0	0	0	6
Asian	5	9	17	2	1	1	0	0	35
Black	59	116	132	19	7	2	0	0	335
White	566	1,029	893	360	242	166	32	25	3,313
Not Available	56	268	94	26	13	4	0	0	461
Not Applicable	3	0	0	0	0	0	0	0	3
Total	691	1,423	1,137	408	264	173	32	25	4,153
Hispanic (Ethnicity)	44	69	84	39	19	13	2	2	272

Table 24.D.18
Rate of HALs Originated by Race/Ethnicity of Borrower
 24. Lorain County
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	18.2%	10.0%	11.1%	20.0%	12.5%	.0%	.0%	.0%	9.8%
Asian	5.6%	10.7%	20.5%	5.3%	2.6%	2.9%	.0%	.0%	8.4%
Black	29.5%	46.0%	59.2%	17.1%	7.2%	3.0%	.0%	.0%	31.2%
White	11.1%	19.3%	19.8%	11.4%	9.8%	7.5%	1.6%	1.4%	12.5%
Not Available	20.5%	64.0%	40.9%	17.3%	11.6%	4.3%	.0%	.0%	30.7%
Not Applicable	13.0%	.0%	.0%	.0%	%	.0%	%	%	10%
Average	12.2%	23.4%	22.5%	11.8%	9.7%	7.1%	01.5%	01.3%	14.1%
Non-Hispanic Ethnicity	552	1,075	958	345	230	158	29	21	3,368
Hispanic (Ethnicity)	17.7%	27.8%	34.0%	24.7%	15.2%	12.1%	2.5%	2.4%	21.0%

Table 24.D.19
Loans by HAL Status by Race/Ethnicity of Borrower
 24. Lorain County
 2004–2011 HMDA Data

Race	Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Other	9	9	8	4	7	9	5	4	55
	HAL	2	1	1	1	1	0	0	0	6
	Percent HAL	18.2%	10.0%	11.1%	20.0%	12.5%	.0%	.0%	.0%	9.8%
Asian	Other	85	75	66	36	37	33	28	22	382
	HAL	5	9	17	2	1	1	0	0	35
	Percent HAL	5.6%	10.7%	20.5%	5.3%	2.6%	2.9%	.0%	.0%	8.4%
Black	Other	141	136	91	92	90	65	63	60	738
	HAL	59	116	132	19	7	2	0	0	335
	Percent HAL	29.5%	46.0%	59.2%	17.1%	7.2%	3.0%	.0%	.0%	31.2%
White	Other	4,520	4,298	3,610	2,786	2,225	2,053	1,917	1,751	23,160
	HAL	566	1,029	893	360	242	166	32	25	3,313
	Percent HAL	11.1%	19.3%	19.8%	11.4%	9.8%	7.5%	01.6%	01.4%	12.5%
Not Available	Other	217	151	136	124	99	90	109	115	1,041
	HAL	56	268	94	26	13	4	0	0	461
	Percent HAL	20.5%	64.0%	40.9%	17.3%	11.6%	4.3%	.0%	.0%	30.7%
Not Applicable	Other	20	2	1	2	0	1	0	0	26
	HAL	3	0	0	0	0	0	0	0	3
	Percent HAL	13.0%	.0%	.0%	.0%	%	.0%	%	%	10.0%
Total	Other	4,992	4,671	3,912	3,044	2,458	2,251	2,122	1,952	25,402
	HAL	691	1,423	1,137	408	264	173	32	25	4,153
	Percent HAL	12.2%	23.4%	22.5%	11.8%	9.7%	7.1%	1.5%	1.3%	14.1%
Non-Hispanic Ethnicity	Other	3,998	4,320	3,614	2,799	2,256	2,064	1,950	1,784	22,785
	HAL	552	1,075	958	345	230	158	29	21	3,368
	Percent HAL	12.1%	19.9%	21.0%	11.0%	9.3%	7.1%	1.5%	1.2%	12.9%
Hispanic (Ethnicity)	Other	205	179	163	119	106	94	79	81	1,026
	HAL	44	69	84	39	19	13	2	2	272
	Percent HAL	17.7%	27.8%	34.0%	24.7%	15.2%	12.1%	2.5%	2.4%	21.0%

Table 24.D.20
Rates of HALs by Income of Borrower
 24. Lorain County
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Average
\$15,000 or Below	21.9%	16.7%	16.7%	25.0%	20.0%	10.0%	.0%	.0%	14.5%
\$15,001–\$30,000	22.2%	35.0%	38.3%	20.0%	17.8%	10.6%	3.0%	3.0%	22.3%
\$30,001–\$45,000	18.9%	33.3%	31.2%	17.3%	12.2%	9.2%	2.9%	2.2%	19.9%
\$45,001–\$60,000	13.4%	29.1%	30.0%	14.1%	10.0%	7.2%	.8%	.8%	17.4%
\$60,001–\$75,000	10.7%	17.9%	20.5%	10.2%	8.0%	5.6%	.7%	.9%	11.9%
Above \$75,000	4.8%	12.0%	10.0%	5.3%	5.8%	5.1%	0.9%	.7%	6.7%
Data Missing	2.6%	20.0%	28.0%	33.9%	10.0%	.0%	.0%	.0%	16.9%
Average	12.2%	23.4%	22.5%	11.8%	9.7%	7.1%	1.5%	1.3%	14.1%

Table 24.D.21
Loans by HAL Status by Income of Borrower
 24. Lorain County
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Other	25	20	30	9	8	18	16	16	142
	HAL	7	4	6	3	2	2	0	0	24
	Percent HAL	21.9%	16.7%	16.7%	25.0%	20.0%	10.0%	.0%	.0%	14.5%
\$15,001–\$30,000	Other	458	408	276	288	259	287	255	197	2,428
	HAL	131	220	171	72	56	34	8	6	698
	Percent HAL	22.2%	35.0%	38.3%	20.0%	17.8%	10.6%	3.0%	3.0%	22.3%
\$30,001–\$45,000	Other	1,024	812	653	520	467	476	407	397	4,756
	HAL	239	405	296	109	65	48	12	9	1,183
	Percent HAL	18.9%	33.3%	31.2%	17.3%	12.2%	9.2%	2.9%	2.2%	19.9%
\$45,001 – \$60,000	Other	896	909	645	528	493	389	374	352	4,586
	HAL	139	373	277	87	55	30	3	3	967
	Percent HAL	13.4%	29.1%	30.0%	14.1%	10.0%	7.2%	.8%	.8%	17.4%
\$60,001–\$75,000	Other	719	718	527	414	345	323	284	220	3,550
	HAL	86	157	136	47	30	19	2	2	479
	Percent HAL	10.7%	17.9%	20.5%	10.2%	8.0%	5.6%	.7%	.9%	11.9%
Above \$75,000	Other	1,643	1,652	1,591	1,246	859	738	769	749	9,247
	HAL	83	226	177	70	53	40	7	5	661
	Percent HAL	4.8%	12.0%	10.0%	5.3%	5.8%	5.1%	.9%	.7%	6.7%
Data Missing	Other	227	152	190	39	27	20	17	21	693
	HAL	6	38	74	20	3	0	0	0	141
	Percent HAL	2.6%	20.0%	28.0%	33.9%	10.0%	.0%	.0%	.0%	16.9%
Total	Other	4,992	4,671	3,912	3,044	2,458	2,251	2,122	1,952	25,402
	HAL	691	1,423	1,137	408	264	173	32	25	4,153
	Percent HAL	12.2%	23.4%	22.5%	11.8%	9.7%	7.1%	1.5%	1.3%	14.1%

E. CRA DATA

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

Table 24.E.1
Small Business Loans Originated: \$100,000 or Less by Tract MFI
 24. Lorain 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	147	380	2,171	860		3,558
2001	176	432	2,299	995		3,902
2002	203	488	3,042	1,205		4,938
2003	196	665	2,710	1,393		4,964
2004	140	667	2,755	1,434		4,996
2005	134	721	2,909	1,573		5,337
2006	183	905	4,018	2,424		7,530
2007	167	956	4,464	2,702		8,289
2008	137	685	3,356	2,087		6,265
2009	56	258	1,310	870		2,494
2010	47	212	1,145	718		2,122
2011	54	249	1,500	951		2,754
Total	1,640	6,618	31,679	17,212	0	57,149
Loan Amount (\$1,000s)						
2000	2,508	5,000	33,253	12,968		53,729
2001	2,998	4,487	34,174	14,913		56,572
2002	2,042	4,527	34,139	13,837		54,545
2003	2,445	5,941	29,709	15,401		53,496
2004	1,392	6,029	28,238	15,283		50,942
2005	1,121	6,071	29,622	17,113		53,927
2006	1,775	7,172	39,081	24,398		72,426
2007	1,955	8,351	43,570	27,550		81,426
2008	1,390	5,471	28,882	22,293		58,036
2009	630	2,591	13,893	9,022		26,136
2010	654	2,292	14,027	10,044		27,017
2011	670	3,743	21,886	14,882		41,181
Total	19,580	61,675	350,474	197,704	0	629,433

Table 24.E.2
Small Business Loans Originated: \$100,001 to \$250,000 by Tract MFI
 24. Lorain 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	7	15	121	50		193
2001	12	22	174	95		303
2002	9	21	127	75		232
2003	5	30	99	68		202
2004	14	25	98	64		201
2005	4	12	63	57		136
2006	6	8	77	74		165
2007	4	17	69	48		138
2008	6	11	68	33		118
2009	0	6	35	31		72
2010	0	11	54	41		106
2011	3	7	78	34		122
Total	70	185	1,063	670	0	1,988
Loan Amount (\$1,000s)						
2000	957	2,295	20,312	8,921		32,485
2001	2,174	3,737	29,602	16,460		51,973
2002	1,786	3,470	22,058	13,057		40,371
2003	994	5,415	16,817	11,835		35,061
2004	2,646	4,058	17,420	11,504		35,628
2005	848	2,052	11,343	9,597		23,840
2006	1,166	1,538	14,132	13,700		30,536
2007	717	3,174	12,340	8,583		24,814
2008	926	1,903	11,806	5,856		20,491
2009	0	1,121	5,947	5,697		12,765
2010	0	1,938	9,575	7,331		18,844
2011	465	1,337	13,500	6,079		21,381
Total	12,679	32,038	184,852	118,620	0	348,189

Table 24.E.3
Small Business Loans Originated: More than \$250,000 by Tract MFI
 24. Lorain 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	14	108	62		193
2001	8	23	141	71		243
2002	13	18	118	63		212
2003	10	20	107	50		187
2004	5	14	102	56		177
2005	10	14	64	38		126
2006	3	10	89	48		150
2007	6	9	87	40		142
2008	4	6	53	46		109
2009	2	8	50	31		91
2010	9	14	63	53		139
2011	5	11	68	38		122
Total	84	161	1,050	596	0	1,891
Loan Amount (\$1,000s)						
2000	4,257	6,159	51,455	27,370		89,241
2001	3,277	10,381	72,491	33,840		119,989
2002	5,690	9,139	58,695	31,523		105,047
2003	4,272	10,140	55,962	25,036		95,410
2004	1,700	7,559	55,239	29,050		93,548
2005	6,051	7,132	32,610	20,429		66,222
2006	1,172	6,844	47,058	24,002		79,076
2007	3,055	5,368	46,101	22,986		77,510
2008	2,255	2,352	28,231	24,458		57,296
2009	1,300	4,753	23,763	16,583		46,399
2010	5,740	8,104	33,109	26,988		73,941
2011	4,031	5,764	33,895	19,647		63,337
Total	42,800	83,695	538,609	301,912	0	967,016

Table 24.E.4
Small Business Loans to Businesses with Gross Annual Revenues of Less Than \$1 Million by Tract MFI
 24. Lorain 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	69	128	954	377		1,528
2001	110	195	1,087	470		1,862
2002	58	128	831	337		1,354
2003	43	197	900	467		1,607
2004	30	208	901	476		1,615
2005	47	294	1,238	704		2,283
2006	72	282	1,541	924		2,819
2007	73	330	1,690	1,016		3,109
2008	51	197	1,104	627		1,979
2009	12	84	446	310		852
2010	12	76	425	287		800
2011	21	124	694	469		1,308
Total	598	2,243	11,811	6,464	0	21,116
Loan Amount (\$1,000s)						
2000	3,930	5,023	46,115	17,647		72,715
2001	4,139	6,831	67,273	27,738		105,981
2002	6,226	6,274	53,823	25,411		91,734
2003	2,860	7,425	41,523	21,959		73,767
2004	1,031	8,900	33,684	16,823		60,438
2005	2,053	6,262	24,015	19,053		51,383
2006	1,662	4,703	39,422	23,274		69,061
2007	1,272	6,844	36,566	20,844		65,526
2008	908	3,112	27,414	17,912		49,346
2009	164	2,572	15,432	8,738		26,906
2010	147	2,787	14,823	14,698		32,455
2011	1,166	3,634	19,267	13,047		37,114
Total	25,558	64,367	419,357	227,144	0	736,426

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 24.F.1
Fair Housing Complaints by Basis
 24. Lorain County
 2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color			2							2
Disability	5	9	2	1	4	3	2	3		29
Family Status	1		3		2	7	1	4	4	22
National Origin		1	1		2	2	1		3	10
Race	5	8	7	3	5	2	3	1	2	36
Religion		1	1		1				3	6
Sex	1	1	4	1	4		3	2		16
Total Bases	12	20	20	5	18	14	10	10	12	121
Total Complaints	11	18	10	5	13	14	8	9	6	94

Table 24.F.2
Fair Housing Complaints by Issue
 24. Lorain County
 2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Discriminatory refusal to rent	5	5	2	2	3	2	4			23
Discrimination in terms, conditions or privileges relating to rental	1	5	3	1	1	2	1	1		15
Discriminatory terms, conditions, privileges, or services and facilities		2	2	1	2	1	1	2	3	14
Failure to make reasonable accommodation	1	3	2	1		1	2	2		12
Discriminatory advertisement - rental					1	6			3	10
Discriminatory acts under Section 818 (coercion, etc.)	2	4		1		1		2		10
Discriminatory advertising, statements, and notices						2	1	3		6
Non-compliance with design and construction requirements (handicap)		2			2					4
Discrimination in terms, conditions, privileges relating to sale		1			1			1		3
Otherwise deny or make housing available							1	2		3
Other discriminatory acts			1	1		1				3
Discriminatory refusal to negotiate for sale					1	1				2
Discriminatory refusal to rent and negotiate for rental			1		1					2
Discriminatory financing (includes real estate transactions)			2							2
Failure to permit reasonable modification	2									2
Discriminatory refusal to negotiate for rental			1							1
Discriminatory advertising - sale					1					1
False denial or representation of availability						1				1
Discrimination in the terms or conditions for making loans								1		1
Discriminatory brokerage service					1					1
Discrimination in services and facilities relating to sale	1									1
Discrimination in services and facilities relating to rental	1									1
Refusing to provide municipal services or property						1				1
Using ordinances to discriminate in zoning and land use						1				1
Total Issues	13	22	14	7	14	20	10	14	6	120
Total Complaints	11	18	10	5	13	14	8	9	6	94

Table 24.F.3
Fair Housing Complaints by Closure Status
 24. Lorain County
 2004–2012 HUD Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Administrative Closure Cause (FHAP)	3	3	1		1	1	1			10
Conciliated / Settled		2			2	5		1		10
No Cause	6	4	4	3	6	3	3	3		32
Open	2	9	5	2	4	5	4	4		35
								1	6	7
Total Complaints	11	18	10	5	13	14	8	9	6	94

HUD Complaints Found With Cause

Table 24.F.4
Fair Housing Complaints Found With Cause by Basis
 24. Lorain County
 2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability	5	4		1	3	2	1	2		18
Family Status			2		2	6		2		12
Race	1	1	3	1	2		1			9
Sex			3	1	1					5
Total Bases	6	5	8	3	8	8	2	4		44
Total Complaints	6	6	4	3	8	8	3	4		42

Table 24.F.5
Fair Housing Complaints Found With Cause by Issue
 24. Lorain County
 2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Failure to make reasonable accommodation			1	1		1		1	2	8
Discriminatory advertisement - rental						1	6			7
Discrimination in terms, conditions or privileges relating to rental				1	2	1	1	1		7
Non-compliance with design and construction requirements (handicap)				2		2				4
Discriminatory advertising, statements, and notices							1		2	3
Failure to permit reasonable modification			2							2
Discriminatory refusal to rent			2	1	1	1	3	1	1	10
Discriminatory refusal to rent and negotiate for rental					1					1
Discriminatory advertising - sale						1				1
False denial or representation of availability							1			1
Discriminatory terms, conditions, privileges, or services and facilities						1				1
Discrimination in services and facilities relating to sale			1							1
Discriminatory acts under Section 818 (coercion, etc.)				1						1
Total Issues	6	6	4	3	9	11	4	4	0	47
Total Complaints	6	6	4	3	8	8	3	4		42

OHIO CIVIL RIGHTS COMMISSION COMPLAINTS

Table 24.F.6
Fair Housing Complaints by Basis
 24. Lorain County
 2004–2012 OCRRC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color	1		1		1					3
Disability	6	5	1	1	4	3	2	1		23

Family Status	1	1	2	1	1	2	2	6	16	
Gender	1		5	2	4		2	1	15	
National Origin	1	1			3	1			6	
Race	4	9	6	3	2	2	2	1	30	
Religion			1	1	1				3	
Retaliation	2	6	2	1	2	1	2	1	17	
Total Bases	16	22	18	9	19	9	10	10	0	113
Total Complaints	13	20	9	7	13	8	8	8		86

Table 24.F.7
Fair Housing Complaints by Issue
 24. Lorain County
 2004–2012 OCR Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Advertising					1	1	4	3		9
Exclusion	2	10		2	3	2	1			20
Harassment	4	8				1				13
Intimidation		1								1
Other	8	6	2	3	8	1	2			30
Reasonable Accommodation	2	3	1	1	1			1		9
Sexual Harassment		1		1						2
Terms and Conditions	3	5	6	1	4	3	3	4		29
Total Issues	19	34	9	8	17	8	10	8	0	113
Total Complaints	13	20	9	7	13	8	8	8		86

Table 24.F.8
Fair Housing Complaints by Closure Status
 24. Lorain County
 2004–2012 OCR 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	6	3					1	1		11
Failure to Locate Charging Party					1					1
No Cause Finding Issued	1	10	5	1	4	3	4	4		32
No Jurisdiction		1								1
Settlement With Benefits	4	2	1	3	2	3	1	2		18
Successful Conciliation				1	1		1			3
Withdrawal With Benefits	2	4	2	1	5	1	1	1		17
Total Complaints	13	20	9	7	13	8	8	8	0	86

FAIR HOUSING CONTACT SERVICE COMPLAINTS

Table 24.F.9
Fair Housing Complaints by Basis
24. Lorain County
2004–2012 FHCS Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability	2					1				3
Race			1							1
Sex			1							1
Total Bases	2	0	2	0	0	1	0	0	0	5
Total Complaints	2		1			1				4

Table 24.F.10
Fair Housing Complaints by Closure Status
24. Lorain County
2004–2012 FHCS Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Inquiry			1							1
Settled						1				1
Missing	2									2
Total Complaints	2	0	1	0	0	1	0	0	0	4

FAIR HOUSING RESOURCE CENTER COMPLAINTS

Table 24.F.11
Fair Housing Complaints by Basis
24. Lorain County
2004– 2012 FHRC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability									1	1
Total Bases	0	0	0	0	0	0	0	0	1	1
Total Complaints									1	1

Table 24.F.12
Fair Housing Complaints by Issue Type
24. Lorain County
2004– 2012 FHRC Data

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

Table 24.F.13
Fair Housing Complaints by Closure Status
24. Lorain County
2004– 2012 FHRC Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Settled through counseling									1	1
Complaint filed in federal court										35
Total	0	0	0	0	0	0	0	0	1	1

THE HOUSING RESEARCH AND ADVOCACY CENTER COMPLAINTS

Table 24.F.14
Fair Housing Complaints by Basis

24 Lorain County
2004–2012 HRAC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability						1				1
Gender							1			1
National Origin				1						1
Race								1		1
Sex				1						1
Total Bases	0	0	0	2	0	1	1	1	0	5
Total Complaints				2		1	1	1		5

Table 24.F.15
Fair Housing Complaints by Issue

24 Lorain County
2004–2012 HRAC Data

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

Table 24.F.16
Fair Housing Complaints by Action Taken

24 Lorain County
2004–2012 HRAC Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Referred to OCRC				1		1				2
HRAC Conducted Test				1				1		2
Fair Housing Info Given								1		1
Referred to Attorney							1			1
Total	0	0	0	2	0	1	1	2	0	6
Total Complaints				2		1	1	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 24.G.1
Primary Role of Respondent

24. Lorain County
2012–2013 Fair Housing Survey for Housing
Stakeholders Data

Primary Role	Total
Local Government	2
Other Role	1
Total	3

FEDERAL, STATE, AND LOCAL LAWS

Table 24.G.2
Familiarity with Fair
Housing Laws

24. Lorain County
2012–2013 Fair Housing Survey
for Housing Stakeholders Data

Familiarity	Total
Not Familiar	0
Somewhat Familiar	1
Very Familiar	2
Missing	0
Total	3

Table 24.G.3
Perceptions About Fair Housing Laws

24. Lorain 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?	3				3
Are fair housing laws difficult to understand or follow?		3			3
Do you think fair housing laws should be changed?		2	1		3
Do you thing fair housing laws are adequately enforced?	3				3

Table 24.G.4
Fair Housing Activities

24. Lorain 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				3
Have you participated in fair housing training?		3				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?	2			1		3

Table 24.G.5
Protected Classes

24. Lorain County
2012–2013 Fair Housing Survey
for Housing Stakeholders Data

Protected Class	Total
Family Status	2
Religion	2
Gender	1
National Origin	2
Color	1
Sexual Orientation	1
Military	2
Other	2
Total	13

Table 24.G.6
Fair Housing Violation Referrals

24. Lorain County
2012–2013 Fair Housing Survey
for Housing Stakeholders Data

Referral	Total
County	1
HUD	1
OCRC	2
Total	4

LOCAL FAIR HOUSING

Table 24.G.7
Local Fair Housing

24. Lorain 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?	3				3
Are there any specific geographic areas that have fair housing problems?	1	2			3
Are there any specific groups in that face housing discrimination?	1	1	1		3

FAIR HOUSING IN THE PRIVATE SECTOR

Table 24.G.8

Barriers to Fair Housing in the Private Sector

24. Lorain 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	1		3
The real estate industry?			2	1	3
The mortgage and home lending industry?	1	1	1		3
The housing construction or accessible housing design fields?		1	2		3
The home insurance industry?		1	2		3
The home appraisal industry?		1	2		3
Any other housing services?		1	2		3

FAIR HOUSING IN THE PUBLIC SECTOR

Table 24.G.9

Barriers to Fair Housing in the Public Sector

24. Lorain 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		3
Zoning laws?	1	2			3
Occupancy standards or health and safety codes?	1	1	1		3
Property tax policies?	1	2			3
Permitting process?	2	1			3
Housing construction standards?	1	1	1		3
Neighborhood or community development policies?	1	2			3
Limited access to government services, such as employment services?	1	1	1		3
Public administrative actions or regulations?		1	2		3

NARRATIVE COMMENTS

Federal, State, and Local Laws

Table 24.G.10

How did you become aware of fair housing laws?

24. Lorain County

2013 Fair Housing Survey Data

Comments:
15 years of Community Development and working with Federal CDBG, HOME and other funds The Housing Authority must be very cognizant of the fair housing laws as an owner and manager of various types of housing programs.

Local Fair Housing**Table 24.G.11****Are there any specific geographic areas that have fair housing problems?**24. Lorain County
2013 Fair Housing Survey Data

Comments:
Complaints cluster in higher density areas but nothing that would seem out of the norm in number of complaints in any one area

Table 24.G.12**Are there any specific groups in that face housing discrimination?**24. Lorain County
2013 Fair Housing Survey Data

Comments:
African Americans, Hispanics would seem to be most impacted

Fair Housing in the Private Sector**Table 24.G.13****Are you aware of any questionable practices or barriers to fair housing choice in the rental housing market?**24. Lorain County
2013 Fair Housing Survey Data

Comments:
Ongoing turnover in managers and new rental creates a lack of knowledge resulting in poor decisions

Table 24.G.14**Are you aware of any questionable practices or barriers to fair housing choice in the mortgage and home lending industry?**24. Lorain County
2013 Fair Housing Survey Data

Comments:
Disproportionate loan denials

Table 24.G.15**Are you aware of any questionable practices or barriers to fair housing choice in the home appraisal industry?**24. Lorain County
2013 Fair Housing Survey Data

Comments:
Have not seen anything as blatant as example cited above

Fair Housing in the Public Sector**Table 24.G.16****Are you aware of any questionable practices or barriers to fair housing choice in land use policies?**24. Lorain County
2013 Fair Housing Survey Data

Comments:
Localities have been increasing densities allowed in areas as sewers are extended.

Table 24.G.17**Are you aware of any questionable practices or barriers to fair housing choice in occupancy standards or health and safety codes?**

24. Lorain County
2013 Fair Housing Survey Data

Comments:
Unsure, but there may be concerns more around migrant workers.

Table 24.G.18**Are you aware of any questionable practices or barriers to fair housing choice in property tax policies?**

24. Lorain County
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.

Table 24.G.19**Are you aware of any questionable practices or barriers to fair housing choice in the permitting process?**

24. Lorain County
2013 Fair Housing Survey Data

Comments:
I am not aware of a community that has translated forms into Spanish within the County.

Table 24.G.20**Are you aware of any questionable practices or barriers to fair housing choice in housing construction standards?**

24. Lorain County
2013 Fair Housing Survey Data

Comments:
Most Building Departments and architects are able to refer to online standards

Table 24.G.21**Are you aware of any barriers that limit access to government services, such as a lack of transportation or employment services?**

24. Lorain County
2013 Fair Housing Survey Data

Comments:
Public transportation has been shrinking due to budgetary constraints

Table 24.G.22**Are you aware of any questionable practices or barriers to fair housing choice in any other public administrative actions or regulations?**

24. Lorain County
2013 Fair Housing Survey Data

Comments:
There are many jurisdictions within County and cannot be sure how each is performing

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 Lorain County that received and completed the survey.⁵

Table 24.H.1
Housing Development
24. Lorain 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"?	1	4	0	5	10
Guidelines that encourage development affordable housing units?	2	3	0	5	10
Any potential barriers to the development of low- to moderate- income housing?	1	2	2	5	10
Guidelines that allow the development of mixed use housing?	2	3	0	5	10
Any potential barriers to the development of mixed use housing?	2	3	0	5	10
Occupancy Standards					
A definition for the term "family"?	1	3	1	5	10
Residential occupancy standards or limits?	1	3	1	5	10
Special Needs Housing					
A definition for the term "disability"?	1	4	0	5	0
Development standards for making housing accessible to persons with disabilities?	2	3	0	5	10
A process by which persons with disabilities can request modification to the jurisdiction's policies?	2	3	0	5	10
Standards for the development of senior housing?	1	4	0	5	10
Guidelines that distinguish senior citizen housing from other residential uses?	1	2	1	6	10
Guidelines for developing housing for any other special needs populations?	2	2	1	5	10
Fair Housing Policies					
A fair housing ordinance, policy, or regulation?	4	1	0	5	10
Policies or practices for "affirmatively furthering fair housing"?	3	2	0	5	10

I. IMPEDIMENTS

The 2013 Northeast Ohio Regional Analysis of Impediments to Fair Housing Choice uncovered several potential issues regarding fair housing in the Lorain 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

⁵ For areas with both nonentitlement and entitlement communities, the results of the nonentitlement community government official survey and the entitlement community interviews were summed.

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 Lorain 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 in Lorain 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.

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 Lorain 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. 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, some of which were seen in Lorain County. 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 and it exists in Lorain 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 24.I.1
Impediments Matrix
 24. Lorain 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 ⁶		
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	Lack of inclusionary policies							X		X	All	M

⁶ 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.

25. CITY OF ELYRIA

A. CENSUS BUREAU DATA

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

Table 25.A.1

Population by Age

25. City of Elyria

2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Under 5	4,419	7.9%	3,763	6.9%	-14.8%
5 to 19	11,824	21.1%	10,887	20.0%	-7.9%
20 to 24	3,622	6.5%	3,499	6.4%	-3.4%
25 to 34	8,273	14.8%	7,091	13.0%	-14.3%
35 to 54	15,884	28.4%	14,794	27.1%	-6.9%
55 to 64	4,682	8.4%	6,685	12.3%	42.8%
65 or Older	7,249	13.0%	7,814	14.3%	7.8%
Total	55,953	100.0%	54,533	100.0%	-2.5%

Table 25.A.2

Elderly Population by Age

25. City of Elyria

2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
65 to 66	785	10.8%	868	11.1%	10.6%
67 to 69	1,123	15.5%	1,245	15.9%	10.9%
70 to 74	1,782	24.6%	1,784	22.8%	.1%
75 to 79	1,576	21.7%	1,425	18.2%	-9.6%
80 to 84	1,073	14.8%	1,207	15.4%	12.5%
85 or Older	910	12.6%	1,285	16.4%	41.2%
Total	7,249	100.0%	7,814	100.0%	7.8%

Table 25.A.3

Population by Race and Ethnicity

25. City of Elyria

2000 & 2010 Census SF1 Data

Race	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
White	45,517	81.3%	42,601	78.1%	-6.4%
Black	7,928	14.2%	8,441	15.5%	6.5%
American Indian	150	.3%	162	.3%	8.0%
Asian	340	.6%	435	.8%	27.9%
Native Hawaiian/ Pacific Islander	11	.0%	4	.0%	-63.6%
Other	532	1.0%	636	1.2%	19.5%
Two or More Races	1,475	2.6%	2,254	4.1%	52.8%
Total	55,953	100.0%	54,533	100.0%	-2.5%
Non-Hispanic	54,400	97.2	51,884	95.1%	-4.6%
Hispanic	1,553	2.8%	2,649	4.9%	70.6%

Table 25.A.4
Disability by Age
 25. City of Elyria
 2010 Three-Year ACS Data

Age	Male		Female		Total	
	Disabled Population	Disability Rate	Disabled Population	Disability Rate	Disabled Population	Disability Rate
Under 5	50	3.0%	0	.0%	50	1.5%
5 to 17	421	9.9%	228	4.5%	649	7.0%
18 to 34	354	5.7%	310	5.5%	664	5.6%
35 to 64	1,754	17.1%	1,862	16.2%	3,616	16.7%
65 to 74	709	36.3%	316	14.1%	1,025	24.5%
75 or Older	594	50.6%	865	50.3%	1,459	50.4%
Total	3,882	15.2%	3,581	12.9%	7,463	14.0%

Table 25.A.5
Employment Status by Disability and Type: Age 18 to 64
 25. City of Elyria
 2010 Three-Year ACS Data

Disability Status	Population
Employed:	24,094
With a disability:	1,768
With a hearing difficulty	261
With a vision difficulty	287
With a cognitive difficulty	443
With an ambulatory difficulty	937
With a self-care difficulty	146
With an independent living difficulty	340
No disability	22,326
Unemployed:	2,840
With a disability:	280
With a hearing difficulty	116
With a vision difficulty	74
With a cognitive difficulty	93
With an ambulatory difficulty	140
With a self-care difficulty	25
With an independent living difficulty	113
No disability	2,560
Not in labor force:	6,684
With a disability:	2,232
With a hearing difficulty	313
With a vision difficulty	429
With a cognitive difficulty	970
With an ambulatory difficulty	1,483
With a self-care difficulty	423
With an independent living difficulty	1,072
No disability	4,452
Total	33,618

Table 25.A.6
Households by Income

25. City of Elyria
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	3,398	15.1%	3,412	15.3%
\$15,000 to \$19,999	1,731	7.7%	1,382	6.2%
\$20,000 to \$24,999	1,673	7.4%	1,496	6.7%
\$25,000 to \$34,999	3,444	15.3%	2,995	13.4%
\$35,000 to \$49,999	4,198	18.7%	3,837	17.2%
\$50,000 to \$74,999	4,657	20.7%	4,724	21.2%
\$75,000 to \$99,999	1,845	8.2%	2,350	10.5%
\$100,000 or More	1,516	6.7%	2,139	9.6%
Total	22,462	100.0%	22,335	100.0%

Table 25.A.7
Poverty by Age

25. City of Elyria
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	1,265	19.8%	1,305	15.3%
6 to 17	1,556	24.3%	2,062	24.1%
18 to 64	3,047	47.7%	4,464	52.2%
65 or Older	525	8.2%	722	8.4%
Total	6,393	100.0%	8,553	100.0%
Poverty Rate	11.7%	.	15.9%	.

Table 25.A.8
Households by Year Home Built

25. City of Elyria
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	4,477	20.0%	4,359	19.5%
1940 to 1949	2,241	10.0%	1,739	7.8%
1950 to 1959	3,708	16.5%	3,944	17.7%
1960 to 1969	3,824	17.1%	3,426	15.3%
1970 to 1979	4,611	20.6%	4,224	18.9%
1980 to 1989	1,734	7.7%	1,385	6.2%
1990 to 1999	1,824	8.1%	1,666	7.5%
2000 to 2004	.	.	1,143	5.1%
2005 or Later	.	.	449	2.0%
Total	22,419	100.0%	22,335	100.0%

Table 25.A.9
Housing Units by Type

25. City of Elyria
 2000 Census SF3 & 2010 Five-Year ACS Data

Unit Type	2000 Census		2010 Five-Year ACS	
	Units	% of Total	Units	% of Total
Single-Family	15,380	64.5%	17,007	68.2%
Duplex	1,296	5.4%	1,379	5.5%
Tri- or Four-Plex	940	3.9%	932	3.7%
Apartment	4,492	18.8%	4,150	16.7%
Mobile Home	1,733	7.3%	1,451	5.8%
Boat, RV, Van, Etc.	0	.0%	0	.0%
Total	23,841	100.0%	24,919	100.0%

Table 25.A.10
Housing Units by Tenure

25. City of Elyria
 2000 & 2010 Census SF1 Data

Tenure	2000 Census		2010 Census		% Change 00–10
	Units	% of Total	Units	% of Total	
Occupied Housing Units	22,409	94.0%	22,400	89.3%	.0%
Owner-Occupied	14,485	64.6%	13,647	60.9%	-5.8%
Renter-Occupied	7,924	35.4%	8,753	39.1%	10.5%
Vacant Housing Units	1,432	6.0%	2,685	10.7%	87.5%
Total Housing Units	23,841	100.0%	25,085	100.0%	5.2%

Table 25.A.11
Disposition of Vacant Housing Units

25. City of Elyria
 2000 & 2010 Census SF1 Data

Disposition	2000 Census		2010 Census		% Change 00–10
	Units	% of Total	Units	% of Total	
For Rent	765	53.4%	1,353	50.4%	76.9%
For Sale	228	15.9%	418	15.6%	83.3%
Rented or Sold, Not Occupied	100	7.0%	141	5.3%	41.0%
For Seasonal, Recreational, or Occasional Use	60	4.2%	59	2.2%	-1.7%
For Migrant Workers	0	0.0%	1	.0%	%
Other Vacant	279	19.5%	713	26.6%	155.6%
Total	1,432	100.0%	2,685	100.0%	87.5%

Table 25.A.12
Households by Household Size
 25. City of Elyria
 2000 & 2010 Census SF1 Data

Size	2000 Census		2010 Census		% Change 00–10
	Households	% of Total	Households	% of Total	
One Person	6,387	28.5%	6,829	30.5%	6.9%
Two Persons	7,284	32.5%	7,463	33.3%	2.5%
Three Persons	3,831	17.1%	3,660	16.3%	-4.5%
Four Persons	2,941	13.1%	2,605	11.6%	-11.4%
Five Persons	1,307	5.8%	1,169	5.2%	-10.6%
Six Persons	461	2.1%	413	1.8%	-10.4%
Seven Persons or More	198	.9%	261	1.2%	31.8%
Total	22,409	100.0%	22,400	100.0%	.0%

Table 25.A.13
Household Type by Tenure
 25. City of Elyria
 2000 & 2010 Census SF1 Data

Household Type	2000 Census		2010 Census		% Change 00–10
	Households	% of Total	Households	% of Total	
Family Households	14,827	66.2%	14,093	62.9%	-5.0%
Married-Couple Family	10,398	70.1%	8,858	62.9%	-14.8%
Owner-Occupied	8,634	83.0%	7,280	82.2%	-15.7%
Renter-Occupied	1,764	17.0%	1,578	17.8%	-10.5%
Other Family	4,429	29.9%	5,235	37.1%	18.2%
Male Householder, No Spouse	1,035	23.4%	1,246	23.8%	20.4%
Owner-Occupied	589	56.9%	654	52.5%	11.0%
Renter-Occupied	446	43.1%	592	47.5%	32.7%
Female Householder, No Spouse	3,394	76.6%	3,989	76.2%	17.5%
Owner-Occupied	1,495	44.0%	1,573	39.4%	5.2%
Renter-Occupied	1,899	56.0%	2,416	60.6%	27.2%
Non-Family Households	7,582	33.8%	8,307	37.1%	9.6%
Owner-Occupied	3,767	49.7%	4,140	49.8%	9.9%
Renter-Occupied	3,815	50.3%	4,167	50.2%	9.2%
Total	22,409	100.0%	22,400	100.0%	.0%

Table 25.A.14
Group Quarters Population
 25. City of Elyria
 2000 & 2010 Census SF1 Data

Group Quarters Type	2000 Census		2010 Census		% Change 00-10
	Population	% of Total	Population	% of Total	
Institutionalized					
Correctional Institutions	384	44.4%	390	44.3%	1.6%
Juvenile Facilities	.	.	61	6.9%	.
Nursing Homes	407	47.1%	430	48.8%	5.7%
Other Institutions	73	8.4%	0	.0%	-100.0%
Total	864	100.0%	881	100.0%	2.0%
Noninstitutionalized					
College Dormitories	0	.0%	0	.0%	%
Military Quarters	0	.0%	0	.0%	%
Other Noninstitutional	70	100.0%	159	100.0%	127.1%
Total	70	7.5%	159	15.3%	127.1%
Total Group Quarters Population	934	100.0%	1,040	100.0%	11.3%

Table 25.A.15
Overcrowding and Severe Overcrowding
 25. City of Elyria
 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	14,357	99.1%	88	.6%	44	.3%	14,489
2010 ACS	14,089	99.4%	79	.6%	11	.1%	14,179
Renter							
2000 Census	7,713	97.3%	165	2.1%	52	.7%	7,930
2010 ACS	7,966	97.7%	140	1.7%	50	.6%	8,156
Total							
2000 Census	22,070	98.4%	253	1.1%	96	.4%	22,419
2010 ACS	22,055	98.7%	219	1.0%	61	.3%	22,335

Table 25.A.16
Households with Incomplete Plumbing Facilities
 25. City of Elyria
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Plumbing Facilities	22,388	22,240
Lacking Complete Plumbing Facilities	31	95
Total Households	22,419	22,335
Percent Lacking	.1%	.4%

Table 25.A.17
Households with Incomplete Kitchen Facilities
 25. City of Elyria
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Kitchen Facilities	22,369	22,163
Lacking Complete Kitchen Facilities	50	172
Total Households	22,419	22,335
Percent Lacking	.2%	.8%

Table 25.A.18
Cost Burden and Severe Cost Burden by Tenure
 25. City of Elyria
 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	6,819	76.4%	1,450	16.3%	639	7.2%	12	.1%	8,920
2010 ACS	6,818	69.0%	1,988	20.1%	996	10.1%	73	.7%	9,875
Owner Without a Mortgage									
2000 Census	3,193	90.2%	220	6.2%	64	1.8%	64	1.8%	3,541
2010 ACS	3,658	85.0%	361	8.4%	285	6.6%	0	.0%	4,304
Renter									
2000 Census	4,662	58.9%	1,468	18.5%	1,350	17.1%	435	5.5%	7,915
2010 ACS	3,967	48.6%	1,725	21.2%	1,950	23.9%	514	6.3%	8,156
Total									
2000 Census	14,674	72.0%	3,138	15.4%	2,053	10.1%	511	2.5%	20,376
2010 ACS	14,443	64.7%	4,074	18.2%	3,231	14.5%	587	2.6%	22,335

Table 25.A.19
Median Housing Costs
 25. City of Elyria
 2000 Census SF3 & 2010 Five-Year ACS Data

Housing Cost	2000 Census	2010 ACS
Median Contract Rent	\$430	\$535
Median Home Value	\$96,600	\$110,100

B. BLS DATA

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

Table 25.B.1
Labor Force Statistics
 25. City of Elyria
 1990–2011 BLS Data

Year	Labor Force	Employment	Unemployment	Unemployment Rate	Statewide Unemployment Rate
1990	29,252	26,730	2,522	8.6%	5.7%
1991	29,166	26,122	3,044	10.4%	6.6%
1992	29,333	26,330	3,003	10.2%	7.4%
1993	29,216	26,951	2,265	7.8%	6.7%
1994	29,850	27,683	2,167	7.3%	5.6%
1995	30,277	28,011	2,266	7.5%	4.9%
1996	30,512	28,530	1,982	6.5%	5.0%
1997	31,025	29,160	1,865	6.0%	4.6%
1998	31,236	29,587	1,649	5.3%	4.3%
1999	31,571	30,019	1,552	4.9%	4.3%
2000	30,184	28,676	1,508	5.0%	4.0%
2001	30,519	28,714	1,805	5.9%	4.4%
2002	30,624	28,553	2,071	6.8%	5.7%
2003	29,636	27,771	1,865	6.3%	6.2%
2004	29,450	27,691	1,759	6.0%	6.1%
2005	29,366	27,658	1,708	5.8%	5.9%
2006	29,542	27,771	1,771	6.0%	5.4%
2007	29,579	27,666	1,913	6.5%	5.6%
2008	29,615	27,495	2,120	7.2%	6.5%
2009	29,408	26,415	2,993	10.2%	10.1%
2010	28,982	26,275	2,707	9.3%	10.0%
2011	28,947	26,622	2,325	8.0%	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.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 25.C.1
Purpose of Loan by Year
25. City of Elyria
2004–2011 HMDA Data

Purpose	2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	2,014	2,224	1,947	1,217	882	799	653	608	10,344
Home Improvement	392	554	600	447	350	208	144	145	2,840
Refinancing	3,644	3,757	3,092	2,120	1,345	1,272	1,007	921	17,158
Total	6,050	6,535	5,639	3,784	2,577	2,279	1,804	1,674	30,342

Table 25.C.2
Occupancy Status for Home Purchase Loan Applications
25. City of Elyria
2004–2011 HMDA Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	Total
Owner-Occupied	1,809	2,029	1,738	1,089	792	732	613	565	9,367
Not Owner-Occupied	187	185	204	124	89	67	40	41	937
Not Applicable	18	10	5	4	1	0	0	2	40
Total	2,014	2,224	1,947	1,217	882	799	653	608	10,344

Table 25.C.3
Owner-Occupied Home Purchase Loan Applications by Loan Type
25. City of Elyria
2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Conventional	1,396	1,660	1,481	836	275	176	123	168	6,115
FHA - Insured	374	332	225	218	475	517	437	353	2,931
VA - Guaranteed	39	37	31	35	42	39	53	44	320
Rural Housing Service or Farm Service Agency	0	0	1	0	0	0	0	0	1
Total	1,809	2,029	1,738	1,089	792	732	613	565	9,367

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 25.C.4
Loan Applications by Action Taken
 25. City of Elyria
 2004–2011 HMDA Data

Action	2004	2005	2006	2007	2008	2009	2010	2011	Total
Loan Originated	881	1,026	779	470	376	341	261	245	4,379
Application Approved but not Accepted	110	151	126	58	32	14	10	20	521
Application Denied	188	250	230	143	81	40	55	54	1,041
Application Withdrawn by Applicant	119	131	97	53	32	34	29	14	509
File Closed for Incompleteness	45	36	36	29	4	9	5	10	174
Loan Purchased by the Institution	466	431	469	336	265	294	253	222	2,736
Preapproval Request Denied	0	4	1	0	2	0	0	0	7
Preapproval Approved but not Accepted	0	0	0	0	0	0	0	0	0
Total	1,809	2,029	1,738	1,089	792	732	613	565	9,367
Denial Rate	17.6%	19.6%	22.8%	23.3%	17.7%	10.5%	17.4%	18.1%	19.2%

Table 25.C.5
Denial Rates by Gender of Applicant
 25. City of Elyria
 2004–2011 HMDA Data

Year	Male	Female	Not Available	Not Applicable	Average
2004	16.3%	17.8%	52.0%	%	17.6%
2005	17.5%	20.9%	50.0%	100.0%	19.6%
2006	19.4%	26.3%	44.1%	%	22.8%
2007	19.2%	26.9%	66.7%	%	23.3%
2008	19.0%	14.8%	33.3%	%	17.7%
2009	9.7%	10.1%	50.0%	%	10.5%
2010	16.9%	16.7%	42.9%	%	17.4%
2011	18.1%	17.7%	22.2%	%	18.1%
Average	17.4%	20.2%	48.0%	100.0%	19.2%

Table 25.C.6
Loan Applications by Selected Action Taken by Gender of Applicant
 25. City of Elyria
 2004–2011 HMDA Data

Gender		2004	2005	2006	2007	2008	2009	2010	2011	Total
Male	Originated	587	691	485	316	218	214	167	145	2,823
	Denied	114	147	117	75	51	23	34	32	593
	Denial Rate	16.3%	17.5%	19.4%	19.2%	19.0%	9.7%	16.9%	18.1%	17.4%
Female	Originated	282	318	275	147	150	124	90	93	1,479
	Denied	61	84	98	54	26	14	18	20	375
	Denial Rate	17.8%	20.9%	26.3%	26.9%	14.8%	10.1%	16.7%	17.7%	20.2%
Not Available	Originated	12	17	19	7	8	3	4	7	77
	Denied	13	17	15	14	4	3	3	2	71
	Denial Rate	52.0%	50.0%	44.1%	66.7%	33.3%	50.0%	42.9%	22.2%	48.0%
Not Applicable	Originated	0	0	0	0	0	0	0	0	0
	Denied	0	2	0	0	0	0	0	0	2
	Denial Rate	%	100.0%	%	%	%	%	%	%	100.0%
Total	Originated	881	1,026	779	470	376	341	261	245	4,379
	Denied	188	250	230	143	81	40	55	54	1,041
	Denial Rate	17.6%	19.6%	22.8%	23.3%	17.7%	10.5%	17.4%	18.1%	19.2%

Table 25.C.7
Denial Rates by Race/Ethnicity of Applicant
 25. City of Elyria
 2004–2011 HMDA Data

Race/Ethnicity	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	.0%	50.0%	.0%	.0%	%	.0%	%	%	12.5%
Asian	6.7%	.0%	.0%	33.3%	100.0%	.0%	33.3%	.0%	10.9%
Black	23.0%	26.0%	36.2%	37.3%	24.3%	15.0%	28.6%	23.8%	28.5%
White	15.6%	17.7%	18.8%	19.0%	15.7%	9.6%	16.1%	17.3%	16.7%
Not Available	43.1%	29.8%	51.3%	67.6%	37.5%	25.0%	22.2%	23.8%	39.5%
Not Applicable	100.0%	100.0%	%	%	%	0%	0%	%	100.0%
Average	17.6%	19.6%	22.8%	23.3%	17.7%	10.5%	17.4%	18.1%	19.2%
Non-Hispanic	16.5%	17.4%	20.0%	19.8%	16.4%	9.0%	16.3%	18.2%	17.3%
Hispanic	23.5%	29.6%	17.1%	45.0%	25.0%	20.0%	11.1%	.0%	23.5%

Table 25.C.8
Loan Applications by Selected Action Taken by Race/Ethnicity of Applicant
 25. City of Elyria
 2004–2011 HMDA Data

Race		2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Originated	1	1	2	1	0	2	0	0	7
	Denied	0	1	0	0	0	0	0	0	1
	Denial Rate	.0%	50.0%	.0%	.0%	%	%	%	%	12.5%
Asian	Originated	14	8	10	4	0	1	2	2	41
	Denied	1	0	0	2	1	0	1	0	5
	Denial Rate	6.7%	.0%	.0%	33.3%	100.0%	.0%	33.3%	.0%	10.9%
Black	Originated	57	74	60	32	28	17	15	16	299
	Denied	17	26	34	19	9	3	6	5	119
	Denial Rate	23.0%	26.0%	36.2%	37.3%	24.3%	15.0%	28.6%	23.8%	28.5%
White	Originated	776	858	668	422	333	309	230	211	3,807
	Denied	143	185	155	99	62	33	44	44	765
	Denial Rate	15.6%	17.7%	18.8%	19.0%	15.7%	9.6%	16.1%	17.3%	16.7%
Not Available	Originated	33	85	39	11	15	12	14	16	225
	Denied	25	36	41	23	9	4	4	5	147
	Denial Rate	43.1%	29.8%	51.3%	67.6%	37.5%	25.0%	22.2%	23.8%	39.5%
Not Applicable	Originated	0	0	0	0	0	0	0	0	0
	Denied	2	2	0	0	0	0	0	0	4
	Denial Rate	43.1%	29.8%	51.3%	67.6%	37.5%	25.0%	22.2%	23.8%	100.0%
Total	Originated	881	1,026	779	470	376	341	261	245	4,379
	Denied	188	250	230	143	81	40	55	54	1,041
	Denial Rate	17.6%	19.6%	22.8%	23.3%	17.7%	10.5%	17.4%	18.1%	19.2%
Non-Hispanic	Originated	747	929	714	445	353	324	242	224	3,978
	Denied	148	196	178	110	69	32	47	50	830
	Denial Rate	16.5%	17.4%	20.0%	19.8%	16.4%	9.0%	16.3%	18.2%	17.3%
Hispanic	Originated	26	19	34	11	9	8	8	9	124
	Denied	8	8	7	9	3	2	1	0	38
	Denial Rate	23.5%	29.6%	17.1%	45.0%	25.0%	20.0%	11.1%	.0%	23.5%

Table 25.C.9
Loan Applications by Reason for Denial
 25. City of Elyria
 2004–2011 HMDA Data

Denial Reason	2004	2005	2006	2007	2008	2009	2010	2011	Total
Debt-to-Income Ratio	23	27	30	26	13	3	9	13	144
Employment History	3	2	7	2	0	1	1	1	17
Credit History	52	50	44	41	25	15	20	21	268
Collateral	7	19	21	9	14	1	10	6	87
Insufficient Cash	2	6	7	1	0	2	3	0	21
Unverifiable Information	4	6	5	4	2	1	1	1	24
Credit Application Incomplete	14	17	11	6	8	0	3	4	63
Mortgage Insurance Denied	0	0	0	0	0	0	0	0	0
Other	43	56	40	12	6	6	6	2	171
Missing	40	67	65	42	13	11	2	6	246
Total	188	250	230	143	81	40	55	54	1,041

Table 25.C.10
Denial Rates by Income of Applicant
 25. City of Elyria
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	45.5%	33.3%	46.2%	66.7%	55.6%	42.9%	18.2%	42.9%	43.0%
\$15,001–\$30,000	21.9%	30.0%	33.3%	26.7%	20.6%	12.3%	20.0%	27.2%	25.2%
\$30,001–\$45,000	18.0%	18.6%	21.9%	24.0%	17.2%	8.8%	17.2%	13.3%	18.4%
\$45,001–\$60,000	15.3%	15.4%	29.1%	15.6%	11.8%	6.8%	12.7%	15.4%	17.0%
\$60,001–\$75,000	12.8%	16.0%	9.0%	15.9%	11.4%	12.5%	17.2%	6.9%	13.1%
Above \$75,000	12.1%	14.7%	12.8%	25.0%	25.0%	7.5%	20.8%	16.7%	15.7%
Data Missing	27.9%	33.3%	11.4%	50.0%	.0%	25.0%	%	25.0%	26.0%
Total	17.6%	19.6%	22.8%	23.3%	17.7%	10.5%	17.4%	18.1%	19.2%

Table 25.C.11
Denial Rates of Loans by Race/Ethnicity and Income of Applicant
 25. City of Elyria
 2004–2011 HMDA Data

Race	<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	Above \$75K	Data Missing	Average
American Indian	.0%	%	50.0%	%	.0%	.0%	.0%	12.5%
Asian	.0%	.0%	12.5%	11.1%	16.7%	11.1%	.0%	10.9%
Black	50.0%	32.6%	25.7%	35.4%	15.8%	25.9%	50.0%	28.5%
White	42.9%	23.8%	16.4%	13.1%	11.7%	12.6%	16.2%	16.7%
Not Available	54.5%	35.4%	36.0%	40.9%	31.0%	39.6%	69.6%	39.5%
Not Applicable	%	100.0%	%	100.0%	%	%	%	100.0%
Average	43.0%	25.2%	18.4%	17.0%	13.1%	15.7%	26.0%	19.2%
Non-Hispanic Ethnicity	37.3%	23.5%	16.1%	15.9%	12.5%	13.8%	18.1%	17.3%
Hispanic (Ethnicity)	66.7%	34.9%	22.9%	9.4%	9.5%	20.0%	50.0%	23.5%

Table 25.C.12
Loan Applications by Reason for Denial by Race/Ethnicity of Applicant
 25. City of Elyria
 2004–2011 HMDA Data

Denial Reason	American Indian	Asian	Black	White	Not Available	Not Applicable	Total	Hispanic (Ethnicity)
Debt-to-Income Ratio	0	1	16	108	18	1	144	8
Employment History	0	0	0	17	0	0	17	0
Credit History	0	2	34	203	29	0	268	8
Collateral	1	0	8	65	12	1	87	4
Insufficient Cash	0	1	0	20	0	0	21	0
Unverifiable Information	0	0	3	17	3	1	24	1
Credit Application Incomplete	0	1	10	46	6	0	63	2
Mortgage Insurance Denied	0	0	0	0	0	0	0	0
Other	0	0	21	129	21	0	171	4
Missing	0	0	27	160	58	1	246	11
Total	1	5	119	765	147	4	1,041	38
% Missing	.0%	.0%	22.7%	20.9%	39.5%	25.0%	23.6%	28.9%

Table 25.C.13
Loan Applications by Income of Applicant: Originated and Denied
 25. City of Elyria
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Loan Originated	6	8	7	3	4	4	9	4	45
	Application Denied	5	4	6	6	5	3	2	3	34
	Denial Rate	45.5%	33.3%	46.2%	66.7%	55.6%	42.9%	18.2%	42.9%	43.0%
\$15,001–\$30,000	Loan Originated	150	161	132	107	81	100	72	59	862
	Application Denied	42	69	66	39	21	14	18	22	291
	Denial Rate	21.9%	30.0%	33.3%	26.7%	20.6%	12.3%	20.0%	27.2%	25.2%
\$30,001–\$45,000	Loan Originated	305	306	235	136	125	114	82	78	1,381
	Application Denied	67	70	66	43	26	11	17	12	312
	Denial Rate	18.0%	18.6%	21.9%	24.0%	17.2%	8.8%	17.2%	13.3%	18.4%
\$45,001–\$60,000	Loan Originated	171	247	144	103	97	55	55	44	916
	Application Denied	31	45	59	19	13	4	8	8	187
	Denial Rate	15.3%	15.4%	29.1%	15.6%	11.8%	6.8%	12.7%	15.4%	17.0%
\$60,001–\$75,000	Loan Originated	109	131	101	53	31	28	24	27	504
	Application Denied	16	25	10	10	4	4	5	2	76
	Denial Rate	12.8%	16.0%	9.0%	15.9%	11.4%	12.5%	17.2%	6.9%	13.1%
Above \$75,000	Loan Originated	109	151	129	63	36	37	19	30	574
	Application Denied	15	26	19	21	12	3	5	6	107
	Denial Rate	12.1%	14.7%	12.8%	25.0%	25.0%	7.5%	20.8%	16.7%	15.7%
Data Missing	Loan Originated	31	22	31	5	2	3	0	3	97
	Application Denied	12	11	4	5	0	1	0	1	34
	Denial Rate	27.9%	33.3%	11.4%	50.0%	.0%	25.0%	.	25.0%	26.0%
Total	Loan Originated	881	1,026	779	470	376	341	261	245	4,379
	Application Denied	188	250	230	143	81	40	55	54	1,041
	Denial Rate	17.6%	19.6%	22.8%	23.3%	17.7%	10.5%	17.4%	18.1%	19.2%

Table 25.C.14
Loan Applications by Income and Race/Ethnicity of Applicant: Originated and Denied
 25. City of Elyria
 2004–2011 HMDA Data

Race		<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	> \$75K	Data Missing	Total
American Indian	Loan Originated	2	0	1	0	2	1	1	7
	Application Denied	0	0	1	0	0	0	0	1
	Denial Rate	.0%	%	50.0%	%	.0%	.0%	.0%	12.5%
Asian	Loan Originated	1	1	14	8	5	8	4	41
	Application Denied	0	0	2	1	1	1	0	5
	Denial Rate	.0%	.0%	12.5%	11.1%	16.7%	11.1%	.0%	10.9%
Black	Loan Originated	1	62	84	62	48	40	2	299
	Application Denied	1	30	29	34	9	14	2	119
	Denial Rate	50.0%	32.6%	25.7%	35.4%	15.8%	25.9%	50.0%	28.5%
White	Loan Originated	36	757	1,202	807	429	493	83	3,807
	Application Denied	27	237	235	122	57	71	16	765
	Denial Rate	42.9%	23.8%	16.4%	13.1%	11.7%	12.6%	16.2%	16.7%
Not Available	Loan Originated	5	42	80	39	20	32	7	225
	Application Denied	6	23	45	27	9	21	16	147
	Denial Rate	54.5%	35.4%	36.0%	40.9%	31.0%	39.6%	69.6%	39.5%
Not Applicable	Loan Originated	0	0	0	0	0	0	0	0
	Application Denied	0	1	0	3	0	0	0	4
	Denial Rate	%	100.0%	%	100.0%	%	%	%	100.0%
Total	Loan Originated	45	862	1,381	916	504	574	97	4,379
	Application Denied	34	291	312	187	76	107	34	1,041
	Denial Rate	43.0%	25.2%	18.4%	17.0%	13.1%	15.7%	26.0%	19.2%
Non-Hispanic Ethnicity	Loan Originated	37	788	1,254	834	456	523	86	3,978
	Application Denied	22	242	240	158	65	84	19	830
	Denial Rate	37.3%	23.5%	16.1%	15.9%	12.5%	13.8%	18.1%	17.3%
Hispanic (Ethnicity)	Loan Originated	2	28	37	29	19	8	1	124
	Application Denied	4	15	11	3	2	2	1	38
	Denial Rate	66.7%	34.9%	22.9%	9.4%	9.5%	20.0%	50.0%	23.5%

PREDATORY LENDING

Table 25.C.15
Originated Owner-Occupied Loans by HAL Status
 25. City of Elyria
 2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Other	711	674	531	390	325	309	256	243	3,439
HAL	170	352	248	80	51	32	5	2	940
Total	881	1,026	779	470	376	341	261	245	4,379
Percent HAL	19.3%	34.3%	31.8%	17.0%	13.6%	9.4%	1.9%	.8%	21.5%

Table 25.C.16
Loans by Loan Purpose by HAL Status
 25. City of Elyria
 2004–2011 HMDA Data

Loan Purpose		2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	Other	711	674	531	390	325	309	256	243	3,439
	HAL	170	352	248	80	51	32	5	2	940
	Percent HAL	19.3%	34.3%	31.8%	17.0%	13.6%	9.4%	1.9%	.8%	21.5%
Home Improvement	Other	88	109	153	100	97	64	50	55	716
	HAL	32	66	56	32	7	13	3	3	212
	Percent HAL	26.7%	37.7%	26.8%	24.2%	6.7%	16.9%	5.7%	5.2%	22.8%
Refinancing	Other	825	650	484	392	354	415	361	349	3,830
	HAL	257	425	356	120	72	34	8	7	1,279
	Percent HAL	23.8%	39.5%	42.4%	23.4%	16.9%	7.6%	2.2%	2.0%	25.0%
Total	Other	1,624	1,433	1,168	882	776	788	667	647	7,985
	HAL	459	843	660	232	51	32	5	2	2,431
	Percent HAL	22.0%	37.0%	36.1%	20.8%	14.3%	9.1%	2.3%	1.8%	23.3%

Table 25.C.17
HALs Originated by Race of Borrower
 25. City of Elyria
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	1	0	0	1	0	0	0	0	2
Asian	2	1	4	0	0	0	0	0	7
Black	15	31	37	5	0	2	0	0	90
White	143	249	188	70	49	29	5	2	735
Not Available	9	71	19	4	2	1	0	0	106
Not Applicable	0	0	0	0	0	0	0	0	0
Total	170	352	248	80	51	32	5	2	940
Hispanic (Ethnicity)	7	7	7	4	2	0	0	0	27

Table 25.C.18
Rate of HALs Originated by Race/Ethnicity of Borrower
 25. City of Elyria
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	100.0%	.0%	.0%	100.0%	%	.0%	%	%	28.6%
Asian	14.3%	12.5%	40.0%	.0%	%	.0%	.0%	.0%	17.1%
Black	26.3%	41.9%	61.7%	15.6%	.0%	11.8%	.0%	.0%	30.1%
White	18.4%	29.0%	28.1%	16.6%	14.7%	9.4%	2.2%	.9%	19.3%
Not Available	27.3%	83.5%	48.7%	36.4%	13.3%	8.3%	.0%	.0%	47.1%
Not Applicable	%	%	%	%	%	%	%	%	%
Average	19.3%	34.3%	31.8%	17.0%	13.6%	9.4%	01.9%	0.8%	21.5%
Non-Hispanic Ethnicity	19.0%	29.8%	31.8%	16.0%	13.3%	9.6%	1.7%	.4%	20.1%
Hispanic (Ethnicity)	26.9%	36.8%	20.6%	36.4%	22.2%	.0%	.0%	.0%	21.8%

Table 25.C.19
Loans by HAL Status by Race/Ethnicity of Borrower
 25. City of Elyria
 2004–2011 HMDA Data

Race	Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Other	0	1	2	0	0	2	0	0	5
	HAL	1	0	0	1	0	0	0	0	2
	Percent HAL	100.0%	.0%	.0%	100.0%	%	.0%	%	%	28.6%
Asian	Other	12	7	6	4	0	1	2	2	34
	HAL	2	1	4	0	0	0	0	0	7
	Percent HAL	14.3%	12.5%	40.0%	.0%	%	.0%	.0%	.0%	17.1%
Black	Other	42	43	23	27	28	15	15	16	209
	HAL	15	31	37	5	0	2	0	0	90
	Percent HAL	26.3%	41.9%	61.7%	15.6%	.0%	11.8%	.0%	.0%	30.1%
White	Other	633	609	480	352	284	280	225	209	3,072
	HAL	143	249	188	70	49	29	5	2	735
	Percent HAL	18.4%	29.0%	28.1%	16.6%	14.7%	9.4%	02.2%	0.9%	19.3%
Not Available	Other	24	14	20	7	13	11	14	16	119
	HAL	9	71	19	4	2	1	0	0	106
	Percent HAL	27.3%	83.5%	48.7%	36.4%	13.3%	8.3%	.0%	.0%	47.1%
Not Applicable	Other	0	0	0	0	0	0	0	0	0
	HAL	0	0	0	0	0	0	0	0	0
	Percent HAL	%	%	%	%	%	%	%	%	.0%
Total	Other	711	674	531	390	325	309	256	243	3,439
	HAL	170	352	248	80	51	32	5	2	940
	Percent HAL	19.3%	34.3%	31.8%	17.0%	13.6%	9.4%	1.9%	.8%	21.5%
Non-Hispanic Ethnicity	Other	605	652	487	374	306	293	238	223	3,178
	HAL	142	277	227	71	47	31	4	1	800
	Percent HAL	19.0%	29.8%	31.8%	16.0%	13.3%	9.6%	1.7%	.4%	20.1%
Hispanic (Ethnicity)	Other	19	12	27	7	7	8	8	9	97
	HAL	7	7	7	4	2	0	0	0	27
	Percent HAL	26.9%	36.8%	20.6%	36.4%	22.2%	.0%	.0%	.0%	21.8%

Table 25.C.20
Rates of HALs by Income of Borrower
 25. City of Elyria
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Average
\$15,000 or Below	50.0%	.0%	28.6%	66.7%	25.0%	.0%	.0%	.0%	17.8%
\$15,001–\$30,000	24.7%	41.6%	45.5%	15.0%	17.3%	10.0%	1.4%	.0%	23.8%
\$30,001–\$45,000	22.6%	39.2%	34.0%	20.6%	15.2%	12.3%	2.4%	.0%	24.0%
\$45,001–\$60,000	19.9%	38.9%	34.0%	19.4%	7.2%	9.1%	.0%	2.3%	23.1%
\$60,001–\$75,000	16.5%	29.0%	26.7%	15.1%	19.4%	.0%	.0%	3.7%	19.4%
Above \$75,000	6.4%	16.6%	14.7%	7.9%	11.1%	8.1%	010.5%	.0%	11.3%
Data Missing	6.5%	27.3%	35.5%	20.0%	.0%	.0%	%	.0%	20.6%
Average	19.3%	34.3%	31.8%	17.0%	13.6%	9.4%	1.9%	.8%	21.5%

Table 25.C.21
Loans by HAL Status by Income of Borrower
 25. City of Elyria
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Other	3	8	5	1	3	4	9	4	37
	HAL	3	0	2	2	1	0	0	0	8
	Percent HAL	50.0%	.0%	28.6%	66.7%	25.0%	.0%	.0%	.0%	17.8%
\$15,001–\$30,000	Other	113	94	72	91	67	90	71	59	657
	HAL	37	67	60	16	14	10	1	0	205
	Percent HAL	24.7%	41.6%	45.5%	15.0%	17.3%	10.0%	1.4%	.0%	23.8%
\$30,001–\$45,000	Other	236	186	155	108	106	100	80	78	1,049
	HAL	69	120	80	28	19	14	2	0	332
	Percent HAL	22.6%	39.2%	34.0%	20.6%	15.2%	12.3%	2.4%	.0%	24.0%
\$45,001–\$60,000	Other	137	151	95	83	90	50	55	43	704
	HAL	34	96	49	20	7	5	0	1	212
	Percent HAL	19.9%	38.9%	34.0%	19.4%	7.2%	9.1%	.0%	2.3%	23.1%
\$60,001–\$75,000	Other	91	93	74	45	25	28	24	26	406
	HAL	18	38	27	8	6	0	0	1	98
	Percent HAL	16.5%	29.0%	26.7%	15.1%	19.4%	.0%	.0%	3.7%	19.4%
Above \$75,000	Other	102	126	110	58	32	34	17	30	509
	HAL	7	25	19	5	4	3	2	0	65
	Percent HAL	6.4%	16.6%	14.7%	7.9%	11.1%	8.1%	10.5%	.0%	11.3%
Data Missing	Other	29	16	20	4	2	3	0	3	77
	HAL	2	6	11	1	0	0	0	0	20
	Percent HAL	6.5%	27.3%	35.5%	20.0%	.0%	.0%	%	.0%	20.6%
Total	Other	711	674	531	390	325	309	256	243	3,439
	HAL	170	352	248	80	51	32	5	2	940
	Percent HAL	19.3%	34.3%	31.8%	17.0%	13.6%	9.4%	1.9%	.8%	21.5%

D. CRA DATA

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

Table 25.D.1
Small Business Loans Originated: \$100,000 or Less by Tract MFI
 25. City of Elyria
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	66	166	427			659
2001	68	176	441			685
2002	93	220	598			911
2003	163	196	574			933
2004	118	218	517			853
2005	114	240	600			954
2006	144	299	841			1,284
2007	132	275	915			1,322
2008	108	230	667			1,005
2009	44	104	211			359
2010	36	65	233			334
2011	44	91	286			421
Total	1,130	2,280	6,310	0	0	9,720
Loan Amount (\$1,000s)						
2000	1,191	2,078	6,900			10,169
2001	983	2,245	6,445			9,673
2002	1,106	2,270	8,628			12,004
2003	1,951	1,658	6,937			10,546
2004	1,261	1,941	5,447			8,649
2005	1,013	2,209	6,685			9,907
2006	1,283	2,672	8,048			12,003
2007	1,445	2,626	8,527			12,598
2008	1,213	2,249	5,861			9,323
2009	508	959	2,547			4,014
2010	456	653	3,003			4,112
2011	540	1,277	4,821			6,638
Total	12,950	22,837	73,849	0	0	109,636

Table 25.D.2
Small Business Loans Originated: \$100,001 to \$250,000 by Tract MFI
 25. City of Elyria
 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	7	28			36
2001	5	14	35			54
2002	4	13	30			47
2003	5	12	29			46
2004	11	9	31			51
2005	4	3	18			25
2006	5	4	27			36
2007	3	4	20			27
2008	6	4	14			24
2009	0	3	8			11
2010	0	2	15			17
2011	2	2	26			30
Total	46	77	281	0	0	404
Loan Amount (\$1,000s)						
2000	110	883	5,190			6,183
2001	982	2,369	5,916			9,267
2002	846	2,283	5,209			8,338
2003	994	2,331	4,763			8,088
2004	2,167	1,562	5,155			8,884
2005	848	410	3,173			4,431
2006	1,016	785	5,082			6,883
2007	467	740	3,647			4,854
2008	926	669	2,667			4,262
2009	0	611	1,675			2,286
2010	0	327	2,635			2,962
2011	315	408	4,658			5,381
Total	8,671	13,378	49,770	0	0	71,819

Table 25.D.3
Small Business Loans Originated: More than \$250,000 by Tract MFI
 25. City of Elyria
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	4	8	31			43
2001	4	13	29			46
2002	6	12	39			57
2003	10	4	46			60
2004	5	9	45			59
2005	10	5	24			39
2006	2	3	32			37
2007	5	4	30			39
2008	4	2	14			20
2009	1	2	17			20
2010	8	5	14			27
2011	3	4	22			29
Total	62	71	343	0	0	476
Loan Amount (\$1,000s)						
2000	2,313	3,521	15,091			20,925
2001	1,327	6,531	15,960			23,818
2002	2,244	6,584	21,253			30,081
2003	4,272	1,770	26,430			32,472
2004	1,700	4,978	25,390			32,068
2005	6,051	2,925	14,359			23,335
2006	872	1,875	19,583			22,330
2007	2,655	2,257	16,560			21,472
2008	2,255	767	6,715			9,737
2009	950	755	7,328			9,033
2010	5,290	2,643	7,105			15,038
2011	2,376	2,202	11,801			16,379
Total	32,305	36,808	187,575	0	0	256,688

Table 25.D.4
Small Business Loans to Businesses with Gross Annual Revenues of Less Than \$1 Million by Tract MFI
 25. City of Elyria
 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	55	195			282
2001	43	71	201			315
2002	30	62	157			249
2003	31	65	186			282
2004	26	68	149			243
2005	41	107	222			370
2006	57	97	290			444
2007	59	91	297			447
2008	43	73	191			307
2009	12	36	81			129
2010	11	31	85			127
2011	16	50	130			196
Total	401	806	2,184	0	0	3,391
Loan Amount (\$1,000s)						
2000	1,946	1,410	8,565			11,921
2001	1,301	2,802	12,506			16,609
2002	3,247	3,389	11,460			18,096
2003	2,541	2,887	11,159			16,587
2004	1,024	3,963	6,589			11,576
2005	1,992	2,527	5,964			10,483
2006	1,271	1,892	10,306			13,469
2007	956	2,287	5,847			9,090
2008	838	1,218	4,762			6,818
2009	164	1,022	2,415			3,601
2010	135	1,245	1,663			3,043
2011	257	2,294	3,220			5,771
Total	15,672	26,936	84,456	0	0	127,064

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 25.E.1
Fair Housing Complaints by Basis
25. City of Elyria
2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability	2		1			2		1		6
Family Status			2		1	1	1			5
National Origin									1	1
Race	1	1	3	1		1		1		8
Sex	1		3				1	1		6
Total Bases	4	1	9	1	1	4	2	3	1	26
Total Complaints	3	1	5	1	1	4	2	2	1	20

Table 25.E.2
Fair Housing Complaints by Issue
25. City of Elyria
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		1		6
Discriminatory refusal to rent	1		1			1	2			5
Discriminatory terms, conditions, privileges, or services and facilities						1		1	1	3
Failure to make reasonable accommodation	1		1				1			3
Discriminatory advertising, statements, and notices						1	1			2
Discriminatory refusal to negotiate for sale						1				1
Discriminatory refusal to rent and negotiate for rental			1							1
Discriminatory advertisement - rental					1					1
False denial or representation of availability						1				1
Discriminatory financing (includes real estate transactions)			1							1
Discrimination in services and facilities relating to rental	1									1
Discriminatory acts under Section 818 (coercion, etc.)						1				1
Total Issues	3	1	6	1	1	7	4	2	1	26
Total Complaints	3	1	5	1	1	4	2	2	1	20

Table 25.E.3
Fair Housing Complaints by Closure Status
25. City of Elyria
2004–2012 HUD Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Administrative Closure	1					1				2
Conciliated / Settled	2	1	4	1	1	1	1			11
No Cause			1			2	1	2		6
Open									1	1
Total Complaints	3	1	5	1	1	4	2	2	1	20

HUD Complaints Found With Cause

Table 25.E.4
Fair Housing Complaints Found With Cause by Basis
 25. City of Elyria
 2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability	2					1				3
Family Status			2		1					3
Race		1	3	1						5
Sex			3							3
Total Bases	2	1	8	1	1	1				14
Total Complaints	2	1	4	1	1	1	1			11

Table 25.E.5
Fair Housing Complaints Found With Cause by Issue
 25. City of Elyria
 2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Discriminatory refusal to rent			1		1		1	1		4
Discrimination in terms, conditions or privileges relating to rental				1	2	1				4
Failure to make reasonable accommodation			1					1		2
Discriminatory refusal to rent and negotiate for rental					1					1
Discriminatory advertisement - rental						1				1
False denial or representation of availability							1			1
Total Issues	2	1	4	1	1	2	2	0	0	13
Total Complaints	2	1	4	1	1	1	1			11

OHIO CIVIL RIGHTS COMMISSION COMPLAINTS

Table 25.E.6
Fair Housing Complaints by Basis
 25. City of Elyria
 2004–2012 OCRRC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability	2		1			3	1			7
Family Status			1	1		1				3
Gender			3	1			1	1		6
Race		1	2	1	1			1		6
Religion				1						1
Retaliation	2	1		1		1	1			6
Total Bases	4	2	7	5	0	6	3	2	0	29
Total Complaints	3	2	4	3		5	2	1		20

Table 25.E.7
Fair Housing Complaints by Issue
 25. City of Elyria
 2004–2012 OCRRC Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Advertising							1			1
Exclusion		1		1		1				3
Harassment	1	1				1				3
Other	2	2	1	2		1	1			9
Reasonable Accommodation			1							1
Terms and Conditions	1		2			2	1	1		7
Total Issues	4	4	4	3	0	5	3	1	0	24
Total Complaints	3	2	4	3		5	2	1		20

Table 25.E.8
Fair Housing Complaints by Closure Status
 25. City of Elyria
 2004–2012 OCRRC 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									2
No Cause Finding Issued				1		2	1	1		5
No Jurisdiction		1								1
Settlement With Benefits		1	1	1		1				4
Withdrawal With Benefits	1		2	1		1	1			6
Total Complaints	3	2	4	3	0	5	2	1	0	20

FAIR HOUSING RESOURCE CENTER COMPLAINTS

Table 25.E.11
Fair Housing Complaints by Basis
 25. City of Elyria
 2004– 2012 FHRC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability									1	1
Total Bases	0	0	0	0	0	0	0	0	1	1
Total Complaints									1	1

Table 25.E.12
Fair Housing Complaints by Issue Type
 25. City of Elyria
 2004– 2012 FHRC Data

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

Table 25.E.13
Fair Housing Complaints by Closure Status
 25. City of Elyria
 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	0	0	0	0	0	1	1

THE HOUSING RESEARCH AND ADVOCACY CENTER COMPLAINTS

Table 25.E.14
Fair Housing Complaints by Basis
 25 City of Elyria
 2004–2012 HRAC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Race								1		1
Total Bases	0	0	0	0	0	0	0	1	0	1
Total Complaints								1		1

Table 25.E.15
Fair Housing Complaints by Issue
 25 City of Elyria
 2004–2012 HRAC Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Rental								1		1
Total	0	0	0	0	0	0	0	1	0	1
Total Complaints								1		1

Table 25.E.16
Fair Housing Complaints by Action Taken
 25 City of Elyria
 2004–2012 HRAC Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Fair Housing Info Given								1		1
HRAC Conducted Test								1		1
Total	0	0	0	0	0	0	0	2	0	2
Total Complaints								1		1

F. FAIR HOUSING SURVEY FOR HOUSING STAKEHOLDERS DATA

No responses were received from Elyria 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 25.G.1
Housing Development
 25. City of Elyria
 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"?	No
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"?	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?	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 Elyria. 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 Elyria.

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 25.H.1
Impediments Matrix
 25. City of Elyria
 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 ⁸		
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	Lack of inclusionary policies							X		X	All	M

⁸ 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.

26. CITY OF LORAIN

A. CENSUS BUREAU DATA

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

Table 26.A.1

Population by Age

26. City of Lorain

2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Under 5	5,473	8.0%	4,661	7.3%	-14.8%
5 to 19	15,814	23.0%	14,225	22.2%	-10.0%
20 to 24	4,353	6.3%	3,829	6.0%	-12.0%
25 to 34	9,260	13.5%	7,934	12.4%	-14.3%
35 to 54	18,655	27.2%	16,868	26.3%	-9.6%
55 to 64	5,515	8.0%	7,668	12.0%	39.0%
65 or Older	9,582	14.0%	8,912	13.9%	-7.0%
Total	68,652	100.0%	64,097	100.0%	-6.6%

Table 26.A.2

Elderly Population by Age

26. City of Lorain

2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
65 to 66	949	9.9%	973	10.9%	2.5%
67 to 69	1,389	14.5%	1,401	15.7%	.9%
70 to 74	2,612	27.3%	1,994	22.4%	-23.7%
75 to 79	2,133	22.3%	1,643	18.4%	-23.0%
80 to 84	1,456	15.2%	1,514	17.0%	4.0%
85 or Older	1,043	10.9%	1,387	15.6%	33.0%
Total	9,582	100.0%	8,912	100.0%	-7.0%

Table 26.A.3

Population by Race and Ethnicity

26. City of Lorain

2000 & 2010 Census SF1 Data

Race	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
White	47,848	69.7%	43,505	67.9%	-9.1%
Black	10,943	15.9%	11,262	17.6%	2.9%
American Indian	304	.4%	324	.5%	6.6%
Asian	227	.3%	228	.4%	.4%
Native Hawaiian/ Pacific Islander	24	.0%	9	.0%	-62.5%
Other	6,565	9.6%	5,310	8.3%	-19.1%
Two or More Races	2,741	4.0%	3,459	5.4%	26.2%
Total	68,652	100.0%	64,097	100.0%	-6.6%
Non-Hispanic	54,214	79.0	47,920	74.8%	-11.6%
Hispanic	14,438	21.0%	16,177	25.2%	12.0%

Table 26.A.4
Disability by Age
 26. City of Lorain
 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%	41	1.6%	41	.8%
5 to 17	994	15.0%	357	5.5%	1,351	10.3%
18 to 34	700	11.5%	715	10.0%	1,415	10.7%
35 to 64	2,518	22.0%	2,902	22.8%	5,420	22.4%
65 to 74	623	32.8%	777	32.7%	1,400	32.7%
75 or Older	674	42.9%	1,629	59.5%	2,303	53.4%
Total	5,509	18.2%	6,421	18.9%	11,930	18.6%

Table 26.A.5
Employment Status by Disability and Type: Age 18 to 64
 26. City of Lorain
 2010 Three-Year ACS Data

Disability Status	Population
Employed:	23,181
With a disability:	2,178
With a hearing difficulty	365
With a vision difficulty	279
With a cognitive difficulty	785
With an ambulatory difficulty	917
With a self-care difficulty	53
With an independent living difficulty	436
No disability	21,003
Unemployed:	4,256
With a disability:	815
With a hearing difficulty	132
With a vision difficulty	194
With a cognitive difficulty	518
With an ambulatory difficulty	355
With a self-care difficulty	97
With an independent living difficulty	331
No disability	3,441
Not in labor force:	9,989
With a disability:	3,842
With a hearing difficulty	692
With a vision difficulty	825
With a cognitive difficulty	1,836
With an ambulatory difficulty	2,349
With a self-care difficulty	824
With an independent living difficulty	1,753
No disability	6,147
Total	37,426

Table 26.A.6
Households by Income

26. City of Lorain
 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	5,600	21.2%	6,055	23.3%
\$15,000 to \$19,999	2,161	8.2%	1,877	7.2%
\$20,000 to \$24,999	2,067	7.8%	1,752	6.8%
\$25,000 to \$34,999	3,714	14.1%	3,213	12.4%
\$35,000 to \$49,999	4,577	17.3%	4,134	15.9%
\$50,000 to \$74,999	5,037	19.1%	4,412	17.0%
\$75,000 to \$99,999	1,819	6.9%	2,240	8.6%
\$100,000 or More	1,447	5.5%	2,271	8.8%
Total	26,422	100.0%	25,954	100.0%

Table 26.A.7
Poverty by Age

26. City of Lorain
 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	1,960	16.9%	3,002	16.6%
6 to 17	3,177	27.4%	4,992	27.6%
18 to 64	5,598	48.3%	8,899	49.3%
65 or Older	847	7.3%	1,166	6.5%
Total	11,582	100.0%	18,059	100.0%
Poverty Rate	17.1%	.	27.9%	.

Table 26.A.8
Households by Year Home Built

26. City of Lorain
 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	5,552	21.0%	5,581	21.5%
1940 to 1949	3,215	12.2%	2,145	8.3%
1950 to 1959	5,702	21.6%	5,966	23.0%
1960 to 1969	5,208	19.7%	5,049	19.5%
1970 to 1979	4,357	16.5%	3,663	14.1%
1980 to 1989	1,177	4.5%	1,006	3.9%
1990 to 1999	1,196	4.5%	1,070	4.1%
2000 to 2004	.	.	854	3.3%
2005 or Later	.	.	620	2.4%
Total	26,407	100.0%	25,954	100.0%

Table 26.A.9
Housing Units by Type

26. City of Lorain
 2000 Census SF3 & 2010 Five-Year ACS Data

Unit Type	2000 Census		2010 Five-Year ACS	
	Units	% of Total	Units	% of Total
Single-Family	19,869	70.5%	20,957	71.0%
Duplex	2,563	9.1%	2,395	8.1%
Tri- or Four-Plex	1,131	4.0%	1,173	4.0%
Apartment	4,340	15.4%	4,748	16.1%
Mobile Home	289	1.0%	235	.8%
Boat, RV, Van, Etc.	8	.0%	0	.0%
Total	28,200	100.0%	29,508	100.0%

Table 26.A.10
Housing Units by Tenure

26. City of Lorain
 2000 & 2010 Census SF1 Data

Tenure	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
Occupied Housing Units	26,434	93.6%	25,529	87.6%	-3.4%
Owner-Occupied	16,184	61.2%	14,753	57.8%	-8.8%
Renter-Occupied	10,250	38.8%	10,776	42.2%	5.1%
Vacant Housing Units	1,797	6.4%	3,615	12.4%	101.2%
Total Housing Units	28,231	100.0%	29,144	100.0%	3.2%

Table 26.A.11
Disposition of Vacant Housing Units

26. City of Lorain
 2000 & 2010 Census SF1 Data

Disposition	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
For Rent	798	44.4%	1,642	45.4%	105.8%
For Sale	271	15.1%	557	15.4%	105.5%
Rented or Sold, Not Occupied	209	11.6%	216	6.0%	3.3%
For Seasonal, Recreational, or Occasional Use	52	2.9%	83	2.3%	59.6%
For Migrant Workers	0	0.0%	0	.0%	%
Other Vacant	467	26.0%	1,117	30.9%	139.2%
Total	1,797	100.0%	3,615	100.0%	101.2%

Table 26.A.12
Households by Household Size
 26. City of Lorain
 2000 & 2010 Census SF1 Data

Size	2000 Census		2010 Census		% Change 00-10
	Households	% of Total	Households	% of Total	
One Person	7,241	27.4%	7,871	30.8%	8.7%
Two Persons	8,117	30.7%	7,693	30.1%	-5.2%
Three Persons	4,670	17.7%	4,228	16.6%	-9.5%
Four Persons	3,553	13.4%	3,061	12.0%	-13.8%
Five Persons	1,703	6.4%	1,608	6.3%	-5.6%
Six Persons	704	2.7%	633	2.5%	-10.1%
Seven Persons or More	446	1.7%	435	1.7%	-2.5%
Total	26,434	100.0%	25,529	100.0%	-3.4%

Table 26.A.13
Household Type by Tenure
 26. City of Lorain
 2000 & 2010 Census SF1 Data

Household Type	2000 Census		2010 Census		% Change 00-10
	Households	% of Total	Households	% of Total	
Family Households	17,981	68.0%	16,368	64.1%	-9.0%
Married-Couple Family	11,533	64.1%	9,466	57.8%	-17.9%
Owner-Occupied	9,353	81.1%	7,555	79.8%	-19.2%
Renter-Occupied	2,180	18.9%	1,911	20.2%	-12.3%
Other Family	6,448	35.9%	6,902	42.2%	7.0%
Male Householder, No Spouse	1,365	21.2%	1,547	22.4%	13.3%
Owner-Occupied	762	55.8%	807	52.2%	5.9%
Renter-Occupied	603	44.2%	740	47.8%	22.7%
Female Householder, No Spouse	5,083	78.8%	5,355	77.6%	5.4%
Owner-Occupied	1,895	37.3%	1,883	35.2%	-.6%
Renter-Occupied	3,188	62.7%	3,472	64.8%	8.9%
Non-Family Households	8,453	32.0%	9,161	35.9%	8.4%
Owner-Occupied	4,174	49.4%	4,508	49.2%	8.0%
Renter-Occupied	4,279	50.6%	4,653	50.8%	8.7%
Total	26,434	100.0%	25,529	100.0%	-3.4%

Table 26.A.14
Group Quarters Population
 26. City of Lorain
 2000 & 2010 Census SF1 Data

Group Quarters Type	2000 Census		2010 Census		% Change 00-10
	Population	% of Total	Population	% of Total	
Institutionalized					
Correctional Institutions	24	4.5%	10	2.3%	-58.3%
Juvenile Facilities	.	.	0	.0%	.
Nursing Homes	499	94.3%	423	95.3%	-15.2%
Other Institutions	6	1.1%	11	2.5%	83.3%
Total	529	100.0%	444	100.0%	-16.1%
Noninstitutionalized					
College Dormitories	0	.0%	0	.0%	%
Military Quarters	1	.5%	0	.0%	-100.0%
Other Noninstitutional	193	99.5%	218	100.0%	13.0%
Total	194	26.8%	218	32.9%	12.4%
Total Group Quarters Population	723	100.0%	662	100.0%	-8.4%

Table 26.A.15
Overcrowding and Severe Overcrowding
 26. City of Lorain
 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	15,867	98.5%	213	1.3%	32	.2%	16,112
2010 ACS	14,976	98.7%	119	.8%	71	.5%	15,166
Renter							
2000 Census	9,624	93.5%	441	4.3%	230	2.2%	10,295
2010 ACS	10,430	96.7%	254	2.4%	104	1.0%	10,788
Total							
2000 Census	25,491	96.5%	654	2.5%	262	1.0%	26,407
2010 ACS	25,406	97.9%	373	1.4%	175	.7%	25,954

Table 26.A.16
Households with Incomplete Plumbing Facilities
 26. City of Lorain
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Plumbing Facilities	26,341	25,850
Lacking Complete Plumbing Facilities	66	104
Total Households	26,407	25,954
Percent Lacking	.2%	.4%

Table 26.A.17
Households with Incomplete Kitchen Facilities
 26. City of Lorain
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Kitchen Facilities	26,288	25,607
Lacking Complete Kitchen Facilities	119	347
Total Households	26,407	25,954
Percent Lacking	.5%	1.3%

Table 26.A.18
Cost Burden and Severe Cost Burden by Tenure
 26. City of Lorain
 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	7,361	74.2%	1,744	17.6%	794	8.0%	24	.2%	9,923
2010 ACS	6,559	65.1%	2,380	23.6%	1,130	11.2%	14	.1%	10,083
Owner Without a Mortgage									
2000 Census	4,684	89.1%	313	6.0%	166	3.2%	92	1.8%	5,255
2010 ACS	4,332	85.2%	454	8.9%	247	4.9%	50	1.0%	5,083
Renter									
2000 Census	5,805	56.5%	1,859	18.1%	1,873	18.2%	739	7.2%	10,276
2010 ACS	4,274	39.6%	1,914	17.7%	3,727	34.5%	873	8.1%	10,788
Total									
2000 Census	17,850	70.1%	3,916	15.4%	2,833	11.1%	855	3.4%	25,454
2010 ACS	15,165	58.4%	4,748	18.3%	5,104	19.7%	937	3.6%	25,954

Table 26.A.19
Median Housing Costs
 26. City of Lorain
 2000 Census SF3 & 2010 Five-Year ACS Data

Housing Cost	2000 Census	2010 ACS
Median Contract Rent	\$408	\$490
Median Home Value	\$86,000	\$104,700

B. BLS DATA

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

Table 26.B.1
Labor Force Statistics
 26. City of Lorain
 1990–2011 BLS Data

Year	Labor Force	Employment	Unemployment	Unemployment Rate	Statewide Unemployment Rate
1990	31,942	28,262	3,680	11.5%	5.7%
1991	32,060	27,619	4,441	13.9%	6.6%
1992	32,221	27,839	4,382	13.6%	7.4%
1993	31,800	28,496	3,304	10.4%	6.7%
1994	32,431	29,269	3,162	9.7%	5.6%
1995	32,923	29,616	3,307	10.0%	4.9%
1996	33,057	30,165	2,892	8.7%	5.0%
1997	33,553	30,831	2,722	8.1%	4.6%
1998	33,689	31,283	2,406	7.1%	4.3%
1999	34,005	31,740	2,265	6.7%	4.3%
2000	32,827	30,823	2,004	6.1%	4.0%
2001	33,263	30,865	2,398	7.2%	4.4%
2002	33,444	30,692	2,752	8.2%	5.7%
2003	32,012	29,596	2,416	7.5%	6.2%
2004	31,593	29,327	2,266	7.2%	6.1%
2005	31,475	29,310	2,165	6.9%	5.9%
2006	33,114	30,806	2,308	7.0%	5.4%
2007	33,379	30,867	2,512	7.5%	5.6%
2008	33,569	30,771	2,798	8.3%	6.5%
2009	33,460	29,588	3,872	11.6%	10.1%
2010	30,487	27,053	3,434	11.3%	10.0%
2011	30,475	27,410	3,065	10.1%	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.⁹ The information presented in this section presents detailed HMDA data, including denial rates and predatory lending including high annual percentage rate (APR) loans.

Table 26.C.1
Purpose of Loan by Year
26. City of Lorain
2004–2011 HMDA Data

Purpose	2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	2,244	2,553	2,348	1,336	1,029	826	637	565	11,538
Home Improvement	524	743	586	426	373	231	163	137	3,183
Refinancing	4,416	4,454	3,410	2,525	1,474	1,344	967	841	19,431
Total	7,184	7,750	6,344	4,287	2,876	2,401	1,767	1,543	34,152

Table 26.C.2
Occupancy Status for Home Purchase Loan Applications
26. City of Lorain
2004–2011 HMDA Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	Total
Owner-Occupied	1,901	2,164	1,951	1,115	918	726	583	522	9,880
Not Owner-Occupied	323	378	390	209	110	99	52	43	1,604
Not Applicable	20	11	7	12	1	1	2	0	54
Total	2,244	2,553	2,348	1,336	1,029	826	637	565	11,538

Table 26.C.3
Owner-Occupied Home Purchase Loan Applications by Loan Type
26. City of Lorain
2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Conventional	1,345	1,687	1,615	827	362	208	139	111	6,294
FHA - Insured	501	434	304	261	510	463	402	372	3,247
VA - Guaranteed	54	43	32	27	46	55	42	39	338
Rural Housing Service or Farm Service Agency	1	0	0	0	0	0	0	0	1
Total	1,901	2,164	1,951	1,115	918	726	583	522	9,880

⁹ 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 26.C.4
Loan Applications by Action Taken
 26. City of Lorain
 2004–2011 HMDA Data

Action	2004	2005	2006	2007	2008	2009	2010	2011	Total
Loan Originated	903	1,032	795	481	440	329	242	243	4,465
Application Approved but not Accepted	120	148	129	60	28	21	6	8	520
Application Denied	222	283	304	143	90	58	57	41	1,198
Application Withdrawn by Applicant	108	121	118	48	44	35	26	22	522
File Closed for Incompleteness	36	35	39	36	6	9	4	3	168
Loan Purchased by the Institution	512	540	566	339	309	274	248	205	2,993
Preapproval Request Denied	0	5	0	8	1	0	0	0	14
Preapproval Approved but not Accepted	0	0	0	0	0	0	0	0	0
Total	1,901	2,164	1,951	1,115	918	726	583	522	9,880
Denial Rate	19.7%	21.5%	27.7%	22.9%	17.0%	15.0%	19.1%	14.4%	21.2%

Table 26.C.5
Denial Rates by Gender of Applicant
 26. City of Lorain
 2004–2011 HMDA Data

Year	Male	Female	Not Available	Not Applicable	Average
2004	16.3%	25.1%	38.1%	%	19.7%
2005	20.7%	20.0%	47.2%	%	21.5%
2006	27.5%	25.8%	48.6%	%	27.7%
2007	20.4%	27.1%	33.3%	.0%	22.9%
2008	19.1%	12.8%	27.3%	%	17.0%
2009	15.4%	13.7%	28.6%	%	15.0%
2010	18.2%	21.2%	.0%	%	19.1%
2011	11.3%	18.3%	28.6%	%	14.4%
Average	20.0%	21.6%	40.9%	.0%	21.2%

Table 26.C.6
Loan Applications by Selected Action Taken by Gender of Applicant
 26. City of Lorain
 2004–2011 HMDA Data

Gender		2004	2005	2006	2007	2008	2009	2010	2011	Total
Male	Originated	601	660	508	319	262	204	157	149	2,860
	Denied	117	172	193	82	62	37	35	19	717
	Denial Rate	16.3%	20.7%	27.5%	20.4%	19.1%	15.4%	18.2%	11.3%	20.0%
Female	Originated	289	344	268	151	170	120	82	89	1,513
	Denied	97	86	93	56	25	19	22	20	418
	Denial Rate	25.1%	20.0%	25.8%	27.1%	12.8%	13.7%	21.2%	18.3%	21.6%
Not Available	Originated	13	28	19	10	8	5	3	5	91
	Denied	8	25	18	5	3	2	0	2	63
	Denial Rate	38.1%	47.2%	48.6%	33.3%	27.3%	28.6%	.0%	28.6%	40.9%
Not Applicable	Originated	0	0	0	1	0	0	0	0	1
	Denied	0	0	0	0	0	0	0	0	0
	Denial Rate	%	%	%	.0%	%	%	%	%	.0%
Total	Originated	903	1,032	795	481	440	329	242	243	4,465
	Denied	222	283	304	143	90	58	57	41	1,198
	Denial Rate	19.7%	21.5%	27.7%	22.9%	17.0%	15.0%	19.1%	14.4%	21.2%

Table 26.C.7
Denial Rates by Race/Ethnicity of Applicant
 26. City of Lorain
 2004–2011 HMDA Data

Race/Ethnicity	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	%	50.0%	33.3%	100.0%	50.0%	%	.0%	%	54.5%
Asian	17.6%	8.3%	18.8%	50.0%	16.7%	.0%	100.0%	%	18.5%
Black	26.4%	26.1%	37.9%	26.4%	22.6%	11.4%	19.4%	14.8%	27.4%
White	16.7%	19.3%	21.7%	20.8%	15.1%	13.9%	18.7%	14.2%	18.3%
Not Available	41.8%	31.4%	55.8%	41.2%	33.3%	44.4%	21.4%	16.7%	39.5%
Not Applicable	7.1%	%	.0%	.0%	%	0%	0%	%	6.3%
Average	19.7%	21.5%	27.7%	22.9%	17.0%	15.0%	19.1%	14.4%	21.2%
Non-Hispanic	18.2%	20.4%	25.4%	20.0%	16.2%	14.4%	17.6%	13.2%	19.5%
Hispanic	22.3%	22.0%	26.1%	29.6%	17.1%	15.6%	24.5%	15.2%	22.9%

Table 26.C.8
Loan Applications by Selected Action Taken by Race/Ethnicity of Applicant
 26. City of Lorain
 2004–2011 HMDA Data

Race		2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Originated	0	1	2	0	1	0	1	0	5
	Denied	0	1	1	3	1	0	0	0	6
	Denial Rate	%	50.0%	33.3%	100.0%	50.0%	.0%	.0%	%	54.5%
Asian	Originated	14	11	13	2	10	3	0	0	53
	Denied	3	1	3	2	2	0	1	0	12
	Denial Rate	17.6%	8.3%	18.8%	50.0%	16.7%	.0%	100.0%	%	18.5%
Black	Originated	92	122	105	39	41	31	25	23	478
	Denied	33	43	64	14	12	4	6	4	180
	Denial Rate	26.4%	26.1%	37.9%	26.4%	22.6%	11.4%	19.4%	14.8%	27.4%
White	Originated	731	793	624	419	370	285	205	200	3,627
	Denied	147	190	173	110	66	46	47	33	812
	Denial Rate	16.7%	19.3%	21.7%	20.8%	15.1%	13.9%	18.7%	14.2%	18.3%
Not Available	Originated	53	105	50	20	18	10	11	20	287
	Denied	38	48	63	14	9	8	3	4	187
	Denial Rate	41.8%	31.4%	55.8%	41.2%	33.3%	44.4%	21.4%	16.7%	39.5%
Not Applicable	Originated	13	0	1	1	0	0	0	0	15
	Denied	1	0	0	0	0	0	0	0	1
	Denial Rate	41.8%	31.4%	55.8%	41.2%	33.3%	44.4%	21.4%	16.7%	6.3%
Total	Originated	903	1,032	795	481	440	329	242	243	4,465
	Denied	222	283	304	143	90	58	57	41	1,198
	Denial Rate	19.7%	21.5%	27.7%	22.9%	17.0%	15.0%	19.1%	14.4%	21.2%
Non-Hispanic	Originated	641	800	619	367	358	268	197	197	3,447
	Denied	143	205	211	92	69	45	42	30	837
	Denial Rate	18.2%	20.4%	25.4%	20.0%	16.2%	14.4%	17.6%	13.2%	19.5%
Hispanic	Originated	153	138	130	95	68	54	37	39	714
	Denied	44	39	46	40	14	10	12	7	212
	Denial Rate	22.3%	22.0%	26.1%	29.6%	17.1%	15.6%	24.5%	15.2%	22.9%

Table 26.C.9
Loan Applications by Reason for Denial
 26. City of Lorain
 2004–2011 HMDA Data

Denial Reason	2004	2005	2006	2007	2008	2009	2010	2011	Total
Debt-to-Income Ratio	27	36	41	32	17	14	13	11	191
Employment History	0	3	7	3	4	0	2	1	20
Credit History	46	56	47	32	23	13	19	12	248
Collateral	12	21	15	8	11	11	11	7	96
Insufficient Cash	1	5	5	4	3	2	1	3	24
Unverifiable Information	5	7	12	6	5	3	0	1	39
Credit Application Incomplete	12	15	13	14	5	2	1	3	65
Mortgage Insurance Denied	0	0	0	0	1	2	1	0	4
Other	72	65	45	12	6	7	2	1	210
Missing	47	75	119	32	15	4	7	2	301
Total	222	283	304	143	90	58	57	41	1,198

Table 26.C.10
Denial Rates by Income of Applicant
 26. City of Lorain
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	33.3%	52.9%	27.3%	60.0%	62.5%	33.3%	63.6%	25.0%	42.3%
\$15,001–\$30,000	22.6%	26.3%	38.2%	32.9%	21.0%	17.3%	21.0%	14.9%	26.3%
\$30,001–\$45,000	20.2%	23.5%	29.8%	19.4%	15.1%	12.4%	20.7%	11.6%	21.4%
\$45,001–\$60,000	18.1%	18.8%	25.8%	20.5%	12.6%	13.3%	12.7%	13.3%	18.9%
\$60,001–\$75,000	16.7%	9.5%	23.2%	18.8%	12.5%	14.7%	13.5%	19.2%	15.8%
Above \$75,000	9.3%	16.9%	15.9%	16.1%	17.8%	11.9%	7.1%	11.9%	14.4%
Data Missing	44.1%	28.0%	15.0%	18.2%	20.0%	40.0%	40.0%	33.3%	28.2%
Total	19.7%	21.5%	27.7%	22.9%	17.0%	15.0%	19.1%	14.4%	21.2%

Table 26.C.11
Denial Rates of Loans by Race/Ethnicity and Income of Applicant
 26. City of Lorain
 2004–2011 HMDA Data

Race	<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	Above \$75K	Data Missing	Average
American Indian	%	.0%	75.0%	.0%	%	60.0%	%	54.5%
Asian	50.0%	23.1%	14.3%	27.3%	33.3%	.0%	20.0%	18.5%
Black	80.0%	29.0%	31.7%	24.4%	17.7%	18.4%	15.4%	27.4%
White	39.0%	23.0%	17.6%	16.2%	14.2%	13.7%	26.8%	18.3%
Not Available	35.7%	50.0%	39.0%	42.3%	30.3%	17.7%	50.0%	39.5%
Not Applicable	.0%	.0%	16.7%	.0%	.0%	.0%	%	6.3%
Average	42.3%	26.3%	21.4%	18.9%	15.8%	14.4%	28.2%	21.2%
Non-Hispanic Ethnicity	43.8%	24.3%	19.8%	17.6%	14.6%	13.8%	25.6%	19.5%
Hispanic (Ethnicity)	44.4%	27.2%	23.9%	16.7%	19.2%	16.2%	18.5%	22.9%

Table 26.C.12
Loan Applications by Reason for Denial by Race/Ethnicity of Applicant
 26. City of Lorain
 2004–2011 HMDA Data

Denial Reason	American Indian	Asian	Black	White	Not Available	Not Applicable	Total	Hispanic (Ethnicity)
Debt-to-Income Ratio	0	1	32	134	24	0	191	36
Employment History	0	0	4	12	4	0	20	5
Credit History	2	2	32	183	29	0	248	45
Collateral	0	0	7	79	10	0	96	14
Insufficient Cash	1	0	3	20	0	0	24	7
Unverifiable Information	0	1	12	21	4	1	39	6
Credit Application Incomplete	1	0	8	51	5	0	65	16
Mortgage Insurance Denied	0	0	0	4	0	0	4	1
Other	0	6	39	133	32	0	210	40
Missing	2	2	43	175	79	0	301	42
Total	6	12	180	812	187	1	1,198	212
% Missing	33.3%	16.7%	23.9%	21.6%	42.2%	.0%	25.1%	19.8%

Table 26.C.13
Loan Applications by Income of Applicant: Originated and Denied
 26. City of Lorain
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Loan Originated	8	8	16	4	3	8	4	9	60
	Application Denied	4	9	6	6	5	4	7	3	44
	Denial Rate	33.3%	52.9%	27.3%	60.0%	62.5%	33.3%	63.6%	25.0%	42.3%
\$15,001–\$30,000	Loan Originated	216	233	144	104	109	81	64	57	1,008
	Application Denied	63	83	89	51	29	17	17	10	359
	Denial Rate	22.6%	26.3%	38.2%	32.9%	21.0%	17.3%	21.0%	14.9%	26.3%
\$30,001–\$45,000	Loan Originated	300	296	226	129	118	99	65	76	1,309
	Application Denied	76	91	96	31	21	14	17	10	356
	Denial Rate	20.2%	23.5%	29.8%	19.4%	15.1%	12.4%	20.7%	11.6%	21.4%
\$45,001–\$60,000	Loan Originated	158	224	175	89	83	72	48	39	888
	Application Denied	35	52	61	23	12	11	7	6	207
	Denial Rate	18.1%	18.8%	25.8%	20.5%	12.6%	13.3%	12.7%	13.3%	18.9%
\$60,001–\$75,000	Loan Originated	85	105	73	52	63	29	32	21	460
	Application Denied	17	11	22	12	9	5	5	5	86
	Denial Rate	16.7%	9.5%	23.2%	18.8%	12.5%	14.7%	13.5%	19.2%	15.8%
Above \$75,000	Loan Originated	117	148	127	94	60	37	26	37	646
	Application Denied	12	30	24	18	13	5	2	5	109
	Denial Rate	9.3%	16.9%	15.9%	16.1%	17.8%	11.9%	7.1%	11.9%	14.4%
Data Missing	Loan Originated	19	18	34	9	4	3	3	4	94
	Application Denied	15	7	6	2	1	2	2	2	37
	Denial Rate	44.1%	28.0%	15.0%	18.2%	20.0%	40.0%	40.0%	33.3%	28.2%
Total	Loan Originated	903	1,032	795	481	440	329	242	243	4,465
	Application Denied	222	283	304	143	90	58	57	41	1,198
	Denial Rate	19.7%	21.5%	27.7%	22.9%	17.0%	15.0%	19.1%	14.4%	21.2%

Table 26.C.14
Loan Applications by Income and Race/Ethnicity of Applicant: Originated and Denied
 26. City of Lorain
 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	1	0	2	0	5
	Application Denied	0	0	3	0	0	3	0	6
	Denial Rate	%	.0%	75.0%	.0%	%	60.0%	%	54.5%
Asian	Loan Originated	1	10	18	8	2	10	4	53
	Application Denied	1	3	3	3	1	0	1	12
	Denial Rate	50.0%	23.1%	14.3%	27.3%	33.3%	.0%	20.0%	18.5%
Black	Loan Originated	2	115	149	96	65	40	11	478
	Application Denied	8	47	69	31	14	9	2	180
	Denial Rate	80.0%	29.0%	31.7%	24.4%	17.7%	18.4%	15.4%	27.4%
White	Loan Originated	47	812	1,047	740	369	541	71	3,627
	Application Denied	30	243	223	143	61	86	26	812
	Denial Rate	39.0%	23.0%	17.6%	16.2%	14.2%	13.7%	26.8%	18.3%
Not Available	Loan Originated	9	66	89	41	23	51	8	287
	Application Denied	5	66	57	30	10	11	8	187
	Denial Rate	35.7%	50.0%	39.0%	42.3%	30.3%	17.7%	50.0%	39.5%
Not Applicable	Loan Originated	1	4	5	2	1	2	0	15
	Application Denied	0	0	1	0	0	0	0	1
	Denial Rate	.0%	.0%	16.7%	.0%	.0%	.0%	%	6.3%
Total	Loan Originated	60	1,008	1,309	888	460	646	94	4,465
	Application Denied	44	359	356	207	86	109	37	1,198
	Denial Rate	42.3%	26.3%	21.4%	18.9%	15.8%	14.4%	28.2%	21.2%
Non-Hispanic Ethnicity	Loan Originated	41	734	1,010	700	374	524	64	3,447
	Application Denied	32	235	250	150	64	84	22	837
	Denial Rate	43.8%	24.3%	19.8%	17.6%	14.6%	13.8%	25.6%	19.5%
Hispanic (Ethnicity)	Loan Originated	10	206	220	135	59	62	22	714
	Application Denied	8	77	69	27	14	12	5	212
	Denial Rate	44.4%	27.2%	23.9%	16.7%	19.2%	16.2%	18.5%	22.9%

PREDATORY LENDING

Table 26.C.15
Originated Owner-Occupied Loans by HAL Status
 26. City of Lorain
 2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Other	710	655	487	385	391	297	240	243	3,408
HAL	193	377	308	96	49	32	2	0	1,057
Total	903	1,032	795	481	440	329	242	243	4,465
Percent HAL	21.4%	36.5%	38.7%	20.0%	11.1%	9.7%	.8%	.0%	23.7%

Table 26.C.16
Loans by Loan Purpose by HAL Status
 26. City of Lorain
 2004–2011 HMDA Data

Loan Purpose		2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	Other	710	655	487	385	391	297	240	243	3,408
	HAL	193	377	308	96	49	32	2	0	1,057
	Percent HAL	21.4%	36.5%	38.7%	20.0%	11.1%	9.7%	.8%	.0%	23.7%
Home Improvement	Other	95	140	108	95	97	66	66	43	710
	HAL	46	62	64	32	13	6	3	2	228
	Percent HAL	32.6%	30.7%	37.2%	25.2%	11.8%	8.3%	4.3%	4.4%	24.3%
Refinancing	Other	826	660	444	405	324	412	336	313	3,720
	HAL	343	460	362	162	74	30	4	7	1,442
	Percent HAL	29.3%	41.1%	44.9%	28.6%	18.6%	6.8%	1.2%	2.2%	27.9%
Total	Other	1,631	1,455	1,039	885	812	775	642	599	7,838
	HAL	582	899	734	290	49	32	2	0	2,727
	Percent HAL	26.3%	38.2%	41.4%	24.7%	14.3%	8.1%	1.4%	1.5%	25.8%

Table 26.C.17
HALs Originated by Race of Borrower
 26. City of Lorain
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	0	0	1	0	1	0	0	0	2
Asian	2	1	7	1	1	0	0	0	12
Black	33	62	67	9	6	0	0	0	177
White	136	235	202	80	37	32	2	0	724
Not Available	19	79	31	6	4	0	0	0	139
Not Applicable	3	0	0	0	0	0	0	0	3
Total	193	377	308	96	49	32	2	0	1,057
Hispanic (Ethnicity)	35	42	50	26	12	8	0	0	173

Table 26.C.18
Rate of HALs Originated by Race/Ethnicity of Borrower
 26. City of Lorain
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	%	.0%	50.0%	%	100.0%	%	.0%	%	40.0%
Asian	14.3%	9.1%	53.8%	50.0%	10.0%	.0%	%	%	22.6%
Black	35.9%	50.8%	63.8%	23.1%	14.6%	.0%	.0%	.0%	37.0%
White	18.6%	29.6%	32.4%	19.1%	10.0%	11.2%	1.0%	.0%	20.0%
Not Available	35.8%	75.2%	62.0%	30.0%	22.2%	.0%	.0%	.0%	48.4%
Not Applicable	23.1%	%	.0%	.0%	%	%	%	%	20%
Average	21.4%	36.5%	38.7%	20.0%	11.1%	9.7%	0.8%	0.0%	23.7%
Non-Hispanic Ethnicity	20.7%	33.1%	37.2%	17.2%	9.2%	9.0%	1.0%	%	%
Hispanic (Ethnicity)	22.9%	30.4%	38.5%	27.4%	17.6%	14.8%	.0%	.0%	24.2%

Table 26.C.19
Loans by HAL Status by Race/Ethnicity of Borrower
 26. City of Lorain
 2004–2011 HMDA Data

Race	Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Other	0	1	1	0	0	0	1	0	3
	HAL	0	0	1	0	1	0	0	0	2
	Percent HAL	%	.0%	50.0%	%	100.0%	%	.0%	%	40.0%
Asian	Other	12	10	6	1	9	3	0	0	41
	HAL	2	1	7	1	1	0	0	0	12
	Percent HAL	14.3%	9.1%	53.8%	50.0%	10.0%	.0%	%	%	22.6%
Black	Other	59	60	38	30	35	31	25	23	301
	HAL	33	62	67	9	6	0	0	0	177
	Percent HAL	35.9%	50.8%	63.8%	23.1%	14.6%	.0%	.0%	.0%	37.0%
White	Other	595	558	422	339	333	253	203	200	2,903
	HAL	136	235	202	80	37	32	2	0	724
	Percent HAL	18.6%	29.6%	32.4%	19.1%	10.0%	11.2%	01.0%	0.0%	20.0%
Not Available	Other	34	26	19	14	14	10	11	20	148
	HAL	19	79	31	6	4	0	0	0	139
	Percent HAL	35.8%	75.2%	62.0%	30.0%	22.2%	.0%	.0%	.0%	48.4%
Not Applicable	Other	10	0	1	1	0	0	0	0	12
	HAL	3	0	0	0	0	0	0	0	3
	Percent HAL	23.1%	%	.0%	.0%	%	%	%	%	20.0%
Total	Other	710	655	487	385	391	297	240	243	3,408
	HAL	193	377	308	96	49	32	2	0	1,057
	Percent HAL	21.4%	36.5%	38.7%	20.0%	11.1%	9.7%	.8%	.0%	23.7%
Non-Hispanic Ethnicity	Other	508	535	389	304	325	244	195	197	2,697
	HAL	133	265	230	63	33	24	2		
	Percent HAL	20.7%	33.1%	37.2%	17.2%	9.2%	9.0%	1.0%	%	%
Hispanic (Ethnicity)	Other	118	96	80	69	56	46	37	39	541
	HAL	35	42	50	26	12	8	0	0	173
	Percent HAL	22.9%	30.4%	38.5%	27.4%	17.6%	14.8%	.0%	.0%	24.2%

Table 26.C.20
Rates of HALs by Income of Borrower
 26. City of Lorain
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Average
\$15,000 or Below	25.0%	25.0%	18.8%	25.0%	33.3%	25.0%	.0%	.0%	18.3%
\$15,001–\$30,000	28.7%	42.1%	45.8%	26.9%	15.6%	7.4%	.0%	.0%	27.5%
\$30,001–\$45,000	26.3%	42.6%	45.1%	20.2%	11.0%	10.1%	.0%	.0%	27.2%
\$45,001–\$60,000	20.3%	41.1%	49.1%	18.0%	12.0%	8.3%	2.1%	.0%	27.4%
\$60,001–\$75,000	11.8%	26.7%	21.9%	23.1%	4.8%	10.3%	3.1%	.0%	15.9%
Above \$75,000	5.1%	17.6%	17.3%	9.6%	6.7%	13.5%	0.0%	.0%	11.1%
Data Missing	10.5%	27.8%	38.2%	44.4%	25.0%	.0%	.0%	.0%	26.6%
Average	21.4%	36.5%	38.7%	20.0%	11.1%	9.7%	.8%	.0%	23.7%

Table 26.C.21
Loans by HAL Status by Income of Borrower
 26. City of Lorain
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Other	6	6	13	3	2	6	4	9	49
	HAL	2	2	3	1	1	2	0	0	11
	Percent HAL	25.0%	25.0%	18.8%	25.0%	33.3%	25.0%	.0%	.0%	18.3%
\$15,001–\$30,000	Other	154	135	78	76	92	75	64	57	731
	HAL	62	98	66	28	17	6	0	0	277
	Percent HAL	28.7%	42.1%	45.8%	26.9%	15.6%	7.4%	.0%	.0%	27.5%
\$30,001–\$45,000	Other	221	170	124	103	105	89	65	76	953
	HAL	79	126	102	26	13	10	0	0	356
	Percent HAL	26.3%	42.6%	45.1%	20.2%	11.0%	10.1%	.0%	.0%	27.2%
\$45,001–\$60,000	Other	126	132	89	73	73	66	47	39	645
	HAL	32	92	86	16	10	6	1	0	243
	Percent HAL	20.3%	41.1%	49.1%	18.0%	12.0%	8.3%	2.1%	.0%	27.4%
\$60,001–\$75,000	Other	75	77	57	40	60	26	31	21	387
	HAL	10	28	16	12	3	3	1	0	73
	Percent HAL	11.8%	26.7%	21.9%	23.1%	4.8%	10.3%	3.1%	.0%	15.9%
Above \$75,000	Other	111	122	105	85	56	32	26	37	574
	HAL	6	26	22	9	4	5	0	0	72
	Percent HAL	5.1%	17.6%	17.3%	9.6%	6.7%	13.5%	.0%	.0%	11.1%
Data Missing	Other	17	13	21	5	3	3	3	4	69
	HAL	2	5	13	4	1	0	0	0	25
	Percent HAL	10.5%	27.8%	38.2%	44.4%	25.0%	.0%	.0%	.0%	26.6%
Total	Other	710	655	487	385	391	297	240	243	3,408
	HAL	193	377	308	96	49	32	2	0	1,057
	Percent HAL	21.4%	36.5%	38.7%	20.0%	11.1%	9.7%	.8%	.0%	23.7%

D. CRA DATA

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

Table 26.D.1
Small Business Loans Originated: \$100,000 or Less by Tract MFI
 26. City of Lorain
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	81	182	309	12		584
2001	108	224	261	27		620
2002	110	225	358	38		731
2003	33	425	328			786
2004	22	382	320			724
2005	20	423	316			759
2006	39	523	476			1,038
2007	35	609	468			1,112
2008	29	409	400			838
2009	12	137	159			308
2010	11	129	122			262
2011	10	141	176			327
Total	510	3,809	3,693	77	0	8,089
Loan Amount (\$1,000s)						
2000	1,317	2,506	4,505	366		8,694
2001	2,015	1,996	3,447	458		7,916
2002	936	1,965	2,749	646		6,296
2003	494	4,064	2,928			7,486
2004	131	3,554	3,142			6,827
2005	108	3,479	2,352			5,939
2006	492	4,013	3,767			8,272
2007	510	5,184	4,198			9,892
2008	177	2,964	2,850			5,991
2009	122	1,306	1,259			2,687
2010	198	1,377	1,122			2,697
2011	130	2,213	2,110			4,453
Total	6,630	34,621	34,429	1,470	0	77,150

Table 26.D.2
Small Business Loans Originated: \$100,001 to \$250,000 by Tract MFI
 26. City of Lorain
 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	6	14	1		27
2001	7	6	13	4		30
2002	5	7	10	4		26
2003	0	15	8			23
2004	3	11	17			31
2005	0	8	6			14
2006	1	4	14			19
2007	1	8	6			15
2008	0	6	7			13
2009	0	2	3			5
2010	0	9	1			10
2011	1	4	6			11
Total	24	86	105	9	0	224
Loan Amount (\$1,000s)						
2000	847	1,045	1,934	161		3,987
2001	1,192	1,086	2,214	630		5,122
2002	940	1,020	1,779	706		4,445
2003	0	2,485	1,414			3,899
2004	479	1,792	3,002			5,273
2005	0	1,492	1,292			2,784
2006	150	753	2,661			3,564
2007	250	1,635	871			2,756
2008	0	1,084	1,309			2,393
2009	0	360	540			900
2010	0	1,611	196			1,807
2011	150	781	910			1,841
Total	4,008	15,144	18,122	1,497	0	38,771

Table 26.D.3
Small Business Loans Originated: More than \$250,000 by Tract MFI
 26. City of Lorain
 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	4	16	1		26
2001	4	7	16	2		29
2002	7	1	14	0		22
2003	0	12	4			16
2004	0	4	10			14
2005	0	9	2			11
2006	1	7	5			13
2007	1	5	3			9
2008	0	3	9			12
2009	1	6	7			14
2010	1	9	1			11
2011	2	7	6			15
Total	22	74	93	3	0	192
Loan Amount (\$1,000s)						
2000	1,944	1,940	9,430	360		13,674
2001	1,950	2,876	8,805	740		14,371
2002	3,446	376	6,659	0		10,481
2003	0	5,787	2,480			8,267
2004	0	2,231	6,217			8,448
2005	0	4,207	1,236			5,443
2006	300	4,969	2,986			8,255
2007	400	3,111	2,243			5,754
2008	0	1,065	4,946			6,011
2009	350	3,998	3,969			8,317
2010	450	5,461	300			6,211
2011	1,655	3,562	2,350			7,567
Total	10,495	39,583	51,621	1,100	0	102,799

Table 26.D.4
Small Business Loans to Businesses with Gross Annual Revenues of Less Than \$1 Million by Tract MFI
 26. City of Lorain
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	37	58	138	9		242
2001	67	111	126	18		322
2002	28	52	91	14		185
2003	12	116	90			218
2004	4	116	106			226
2005	6	171	133			310
2006	15	152	192			359
2007	14	208	175			397
2008	8	115	131			254
2009	0	44	49			93
2010	1	40	43			84
2011	5	65	87			157
Total	197	1,248	1,361	41	0	2,847
Loan Amount (\$1,000s)						
2000	1,984	2,469	6,756	761		11,970
2001	2,838	3,302	7,595	736		14,471
2002	2,979	2,101	6,986	875		12,941
2003	319	3,810	3,349			7,478
2004	7	4,253	5,838			10,098
2005	61	3,668	2,326			6,055
2006	391	2,554	4,322			7,267
2007	316	3,949	2,901			7,166
2008	70	1,793	3,946			5,809
2009	0	1,442	885			2,327
2010	12	1,430	490			1,932
2011	909	1,132	2,470			4,511
Total	9,886	31,903	47,864	2,372	0	92,025

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 26.E.1
Fair Housing Complaints by Basis
26. City of Lorain
2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color			2							2
Disability	2	2	1			1	1	1		8
Family Status	1		1						2	4
National Origin		1	1		2		1			5
Race	4	2	4		3	1	2			16
Religion		1	1						1	3
Sex			1	1	3		2			7
Total Bases	7	6	11	1	8	2	6	1	3	45
Total Complaints	7	7	5	1	4	2	4	1	3	34

Table 26.E.2
Fair Housing Complaints by Issue
26. City of Lorain
2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Discriminatory refusal to rent	4	2	1	1		1	2			11
Discriminatory acts under Section 818 (coercion, etc.)	2	4								6
Discrimination in terms, conditions or privileges relating to rental	1	1	1		1	1				5
Failure to make reasonable accommodation			1	1		1		1		4
Discriminatory advertisement - rental									3	3
Discriminatory terms, conditions, privileges, or services and facilities			2				1			3
Discriminatory refusal to negotiate for sale					1					1
Discriminatory refusal to negotiate for rental			1							1
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 terms, conditions, privileges relating to sale					1					1
Discrimination in services and facilities relating to sale	1									1
Otherwise deny or make housing available							1			1
Other discriminatory acts			1							1
Failure to permit reasonable modification	1									1
Total Issues	9	8	8	1	4	4	4	1	3	42
Total Complaints	7	7	5	1	4	2	4	1	3	34

Table 26.E.3
Fair Housing Complaints by Closure Status
 26. City of Lorain
 2004–2012 HUD Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Administrative Closure	2	2	1				1			6
Conciliated / Settled	3	2		1	1	1		1		9
No Cause	2	3	4		3	1	3			16
Open									3	3
Total Complaints	7	7	5	1	4	2	4	1	3	34

HUD Complaints Found With Cause

Table 26.E.4
Fair Housing Complaints Found With Cause by Basis
 26. City of Lorain
 2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability	2	1				1		1		5
Race	1									1
Sex				1	1					2
Total Bases	3	1		1	1	1		1		8
Total Complaints	3	2		1	1	1		1		9

Table 26.E.5
Fair Housing Complaints Found With Cause by Issue
 26. City of Lorain
 2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Failure to make reasonable accommodation			1					1		3
Discriminatory refusal to rent			1		1					2
Discrimination in terms, conditions or privileges relating to rental						1	1			2
Discriminatory advertising, statements, and notices								1		1
Discrimination in services and facilities relating to sale	1									1
Discriminatory acts under Section 818 (coercion, etc.)			1							1
Failure to permit reasonable modification	1									1
Total Issues	3	2	0	1	1	3	0	1	0	11
Total Complaints	3	2		1	1	1		1		9

OHIO CIVIL RIGHTS COMMISSION COMPLAINTS

Table 26.E.6
Fair Housing Complaints by Basis
 26. City of Lorain
 2004–2012 OCRRC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color			1							1
Disability	3	1			1		1	1		7
Family Status	1		1							2
Gender	1		2	1	2		1			7
National Origin	1	1			1					3
Race	3	2	4	1	1	2	2			14
Religion			1							1
Retaliation		5	2		1		1			9
Total Bases	9	9	11	2	6	1	5	1	0	44
Total Complaints	8	9	5	2	4	1	4	1		34

Table 26.E.7
Fair Housing Complaints by Issue
 26. City of Lorain
 2004–2012 OCRC Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Advertising							1			1
Exclusion	2	2		1	1	1	1			8
Harassment	3	4								7
Intimidation		1								1
Other	5	1	1		3		1			11
Reasonable Accommodation	1	1						1		3
Sexual Harassment				1						1
Terms and Conditions	2	3	4	1	1		2			13
Total Issues	13	12	5	3	5	1	5	1	0	45
Total Complaints	8	9	5	2	4	1	4	1		34

Table 26.E.8
Fair Housing Complaints by Closure Status
 26. City of Lorain
 2004–2012 OCRC Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
CP Failed to Cooperate				1						1
CP Withdrawal – No Benefit	4	2					1			7
No Cause Finding Issued		3	5		2		2			12
Settlement With Benefits	3	1		1	1	1	1			8
Withdrawal With Benefits	1	3			1			1		6
Total Complaints	8	9	5	2	4	1	4	1	0	34

FAIR HOUSING CONTACT SERVICE COMPLAINTS

Table 26.E.9
Fair Housing Complaints by Basis
 26. City of Lorain
 2004–2012 FHCS Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability	2									2
Total Bases	2	0	0	0	0	0	0	0	0	2
Total Complaints	2									2

Table 26.E.10
Fair Housing Complaints by Closure Status
 26. City of Lorain
 2004–2012 FHCS Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Missing	2									2
Total Complaints	2	0	0	0	0	0	0	0	0	2

THE HOUSING RESEARCH AND ADVOCACY CENTER COMPLAINTS

Table 26.E.11
Fair Housing Complaints by Basis

26 City of Lorain
2004–2012 HRAC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Gender							1			1
Sex				1						1
Total Bases	0	0	0	1	0	0	1	0	0	2
Total Complaints				1			1			2

Table 26.E.12
Fair Housing Complaints by Issue

26 City of Lorain
2004–2012 HRAC Data

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

Table 26.E.13
Fair Housing Complaints by Action Taken

26 City of Lorain
2004–2012 HRAC Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Referred to Attorney							1			1
HRAC Conducted Test				1						1
Total	0	0	0	1	0	0	1	0	0	2
Total Complaints				1			1			2

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 26.F.1
Primary Role of Respondent

26. City of Lorain
2012–2013 Fair Housing Survey for Housing
Stakeholders Data

Primary Role	Total
Local Government	1
Other Role	1
Total	2

FEDERAL, STATE, AND LOCAL LAWS

Table 26.F.2
Familiarity with Fair Housing Laws

26. City of Lorain
2012–2013 Fair Housing Survey
for Housing Stakeholders Data

Familiarity	Total
Not Familiar	0
Somewhat Familiar	0
Very Familiar	2
Missing	0
Total	2

Table 26.F.3
Perceptions About Fair Housing Laws

26. City of Lorain
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				2
Are fair housing laws difficult to understand or follow?		2			2
Do you think fair housing laws should be changed?		1	1		2
Do you think fair housing laws are adequately enforced?	2				2

Table 26.F.4
Fair Housing Activities

26. City of Lorain
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?		2				2
Have you participated in fair housing training?		2				2
Are you aware of any fair housing testing?		2				2
Testing and education	Too Little	Right Amount	Too Much	Don't Know	Missing	Total
Is there sufficient outreach and education activity?		1		1		2
Is there sufficient testing?	1			1		2

Table 26.F.5**Protected Classes**

26. City of Lorain

2012–2013 Fair Housing Survey
for Housing Stakeholders Data

Protected Class	Total
Family Status	1
Religion	1
Gender	1
National Origin	1
Color	1
Military	1
Other	2
Total	8

Table 26.F.6**Fair Housing Violation Referrals**

26. City of Lorain

2012–2013 Fair Housing Survey for
Housing Stakeholders Data

Referral	Total
HUD	1
OCRC	1
Total	2

LOCAL FAIR HOUSING**Table 26.F.7****Local Fair Housing**

26. City of Lorain

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
Are there any specific geographic areas that have fair housing problems?	1	1			2
Are there any specific groups in that face housing discrimination?		1	1		2

FAIR HOUSING IN THE PRIVATE SECTOR**Table 26.F.8****Barriers to Fair Housing in the Private Sector**

26. City of Lorain

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
The real estate industry?		1		1	2
The mortgage and home lending industry?	1	1			2
The housing construction or accessible housing design fields?	1	1			2
The home insurance industry?	1	1			2
The home appraisal industry?	1	1			2
Any other housing services?	1	1			2

FAIR HOUSING IN THE PUBLIC SECTOR

Table 26.F.9
Barriers to Fair Housing in the Public Sector
 26. City of Lorain
 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
Zoning laws?	1	1			2
Occupancy standards or health and safety codes?	1	1			2
Property tax policies?	1	1			2
Permitting process?	1	1			2
Housing construction standards?	1	1			2
Neighborhood or community development policies?	1	1			2
Limited access to government services, such as employment services?		1	1		2
Public administrative actions or regulations?		1	1		2

NARRATIVE COMMENTS

Federal, State, and Local Laws

Table 26.F.10
How did you become aware of fair housing laws?
 26. City of Lorain
 2013 Fair Housing Survey Data

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

G. LAND USE PLANNING SURVEY DATA

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. While multiple attempts were made to contact the prospective survey respondents in each community, in the City of Lorain, no planning or development staff responded to complete the interview.

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 Lorain. 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 Lorain.

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 Lorain.*

Results of the Fair Housing Surveys indicate that the City appears to not have sufficient policies or practices that adequately address the duty to affirmatively further fair housing.

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, such as in the City. 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. This is sometimes considered NIMBYism and appears to have occurred in the City.

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 26.H.1
Impediments Matrix
 26. City of Lorain
 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 ¹⁰		
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	Lack of inclusionary policies							X		X	All	M

¹⁰ 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.

27. REMAINDER OF LORAIN COUNTY

A. CENSUS BUREAU DATA

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

Table 27.A.1

Population by Age

27. Remainder of Lorain County
2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Under 5	9,842	6.1%	9,613	5.3%	-2.3%
5 to 19	35,106	21.9%	37,274	20.4%	6.2%
20 to 24	8,871	5.5%	9,746	5.3%	9.9%
25 to 34	18,883	11.8%	18,600	10.2%	-1.5%
35 to 54	53,176	33.2%	55,873	30.6%	5.1%
55 to 64	15,429	9.6%	25,215	13.8%	63.4%
65 or Older	18,752	11.7%	26,405	14.5%	40.8%
Total	160,059	100.0%	182,726	100.0%	14.2%

Table 27.A.2

Elderly Population by Age

27. Remainder of Lorain County
2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
65 to 66	2,273	12.1%	3,483	13.2%	53.2%
67 to 69	3,164	16.9%	4,916	18.6%	55.4%
70 to 74	4,846	25.8%	6,264	23.7%	29.3%
75 to 79	4,030	21.5%	4,669	17.7%	15.9%
80 to 84	2,568	13.7%	3,749	14.2%	46.0%
85 or Older	1,871	10.0%	3,324	12.6%	77.7%
Total	18,752	100.0%	26,405	100.0%	40.8%

Table 27.A.3

Population by Race and Ethnicity

27. Remainder of Lorain County
2000 & 2010 Census SF1 Data

Race	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
White	150,149	93.8%	169,304	92.7%	12.8%
Black	5,332	3.3%	6,096	3.3%	14.3%
American Indian	391	.2%	397	.2%	1.5%
Asian	1,136	.7%	2,148	1.2%	89.1%
Native Hawaiian/ Pacific Islander	39	.0%	36	.0%	-7.7%
Other	1,063	.7%	1,464	.8%	37.7%
Two or More Races	1,949	1.2%	3,281	1.8%	68.3%
Total	160,059	100.0%	182,726	100.0%	14.2%
Non-Hispanic	156,374	97.7	176,262	96.5%	12.7%
Hispanic	3,685	2.3%	6,464	3.5%	75.4%

Table 27.A.4**Disability by Age**27. Remainder of Lorain County
2010 Three-Year ACS Data

Age	Male		Female		Total	
	Disabled Population	Disability Rate	Disabled Population	Disability Rate	Disabled Population	Disability Rate
Under 5	67	1.3%	56	1.2%	123	1.3%
5 to 17	955	5.7%	475	3.2%	1,430	4.5%
18 to 34	828	5.5%	1,116	7.0%	1,944	6.3%
35 to 64	3,866	10.1%	4,018	10.1%	7,884	10.1%
65 to 74	1,729	26.8%	1,384	19.0%	3,113	22.7%
75 or Older	2,156	50.3%	3,277	51.5%	5,433	51.0%
Total	9,601	11.2%	10,326	11.6%	19,927	11.4%

Table 27.A.5**Employment Status by Disability and Type: Age 18 to 64**27. Remainder of Lorain County
2010 Three-Year ACS Data

Disability Status	Population
Employed:	81,919
With a disability:	4,578
With a hearing difficulty	1,256
With a vision difficulty	723
With a cognitive difficulty	1,431
With an ambulatory difficulty	1,852
With a self-care difficulty	368
With an independent living difficulty	962
No disability	77,341
Unemployed:	6,717
With a disability:	727
With a hearing difficulty	66
With a vision difficulty	59
With a cognitive difficulty	306
With an ambulatory difficulty	395
With a self-care difficulty	102
With an independent living difficulty	255
No disability	5,990
Not in labor force:	20,673
With a disability:	4,523
With a hearing difficulty	791
With a vision difficulty	419
With a cognitive difficulty	1,981
With an ambulatory difficulty	2,753
With a self-care difficulty	1,040
With an independent living difficulty	2,068
No disability	16,150
Total	109,309

Table 27.A.6**Households by Income**

27. Remainder of Lorain 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	4,562	8.0%	4,748	7.2%
\$15,000 to \$19,999	2,500	4.4%	2,509	3.8%
\$20,000 to \$24,999	2,860	5.0%	2,892	4.4%
\$25,000 to \$34,999	6,227	10.9%	5,882	8.9%
\$35,000 to \$49,999	9,736	17.1%	8,966	13.5%
\$50,000 to \$74,999	14,141	24.8%	14,289	21.6%
\$75,000 to \$99,999	8,553	15.0%	10,551	15.9%
\$100,000 or More	8,412	14.8%	16,353	24.7%
Total	56,991	100.0%	66,190	100.0%

Table 27.A.7**Poverty by Age**

27. Remainder of Lorain 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	689	10.1%	1,274	11.3%
6 to 17	1,150	16.8%	2,115	18.7%
18 to 64	4,115	60.2%	6,628	58.7%
65 or Older	880	12.9%	1,283	11.4%
Total	6,834	100.0%	11,300	100.0%
Poverty Rate	4.5%	.	6.6%	.

Table 27.A.8**Households by Year Home Built**

27. Remainder of Lorain 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	8,579	15.0%	7,999	12.1%
1940 to 1949	3,509	6.2%	3,168	4.8%
1950 to 1959	9,502	16.7%	9,497	14.3%
1960 to 1969	8,437	14.8%	7,427	11.2%
1970 to 1979	11,029	19.3%	10,992	16.6%
1980 to 1989	4,985	8.7%	5,117	7.7%
1990 to 1999	10,969	19.2%	10,577	16.0%
2000 to 2004	.	.	8,098	12.2%
2005 or Later	.	.	3,315	5.0%
Total	57,010	100.0%	66,190	100.0%

Table 27.A.9**Housing Units by Type**27. Remainder of Lorain 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	51,972	87.6%	62,709	88.2%
Duplex	1,384	2.3%	1,294	1.8%
Tri- or Four-Plex	1,064	1.8%	1,431	2.0%
Apartment	3,447	5.8%	4,532	6.4%
Mobile Home	1,448	2.4%	1,153	1.6%
Boat, RV, Van, Etc.	12	.0%	0	.0%
Total	59,327	100.0%	71,119	100.0%

Table 27.A.10**Housing Units by Tenure**27. Remainder of Lorain County
2000 & 2010 Census SF1 Data

Tenure	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
Occupied Housing Units	56,993	96.1%	68,345	93.9%	19.9%
Owner-Occupied	47,812	83.9%	56,346	82.4%	17.8%
Renter-Occupied	9,181	16.1%	11,999	17.6%	30.7%
Vacant Housing Units	2,303	3.9%	4,462	6.1%	93.7%
Total Housing Units	59,296	100.0%	72,807	100.0%	22.8%

Table 27.A.11**Disposition of Vacant Housing Units**27. Remainder of Lorain County
2000 & 2010 Census SF1 Data

Disposition	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
For Rent	664	28.8%	1,178	26.4%	77.4%
For Sale	615	26.7%	1,135	25.4%	84.6%
Rented or Sold, Not Occupied	249	10.8%	399	8.9%	60.2%
For Seasonal, Recreational, or Occasional Use	284	12.3%	572	12.8%	101.4%
For Migrant Workers	1	0.0%	1	.0%	.0%
Other Vacant	490	21.3%	1,177	26.4%	140.2%
Total	2,303	100.0%	4,462	100.0%	93.7%

Table 27.A.12
Households by Household Size
 27. Remainder of Lorain County
 2000 & 2010 Census SF1 Data

Size	2000 Census		2010 Census		% Change 00-10
	Households	% of Total	Households	% of Total	
One Person	11,338	19.9%	15,548	22.7%	37.1%
Two Persons	19,805	34.7%	25,037	36.6%	26.4%
Three Persons	10,152	17.8%	11,237	16.4%	10.7%
Four Persons	9,557	16.8%	9,922	14.5%	3.8%
Five Persons	4,218	7.4%	4,491	6.6%	6.5%
Six Persons	1,313	2.3%	1,506	2.2%	14.7%
Seven Persons or More	610	1.1%	604	.9%	-1.0%
Total	56,993	100.0%	68,345	100.0%	19.9%

Table 27.A.13
Household Type by Tenure
 27. Remainder of Lorain County
 2000 & 2010 Census SF1 Data

Household Type	2000 Census		2010 Census		% Change 00-10
	Households	% of Total	Households	% of Total	
Family Households	43,384	76.1%	49,616	72.6%	14.4%
Married-Couple Family	36,538	84.2%	40,424	81.5%	10.6%
Owner-Occupied	33,703	92.2%	37,230	92.1%	10.5%
Renter-Occupied	2,835	7.8%	3,194	7.9%	12.7%
Other Family	6,846	15.8%	9,192	18.5%	34.3%
Male Householder, No Spouse	1,999	29.2%	2,781	30.3%	39.1%
Owner-Occupied	1,485	74.3%	1,995	71.7%	34.3%
Renter-Occupied	514	25.7%	786	28.3%	52.9%
Female Householder, No Spouse	4,847	70.8%	6,411	69.7%	32.3%
Owner-Occupied	3,352	69.2%	4,123	64.3%	23.0%
Renter-Occupied	1,495	30.8%	2,288	35.7%	53.0%
Non-Family Households	13,609	23.9%	18,729	27.4%	37.6%
Owner-Occupied	9,272	68.1%	12,998	69.4%	40.2%
Renter-Occupied	4,337	31.9%	5,731	30.6%	32.1%
Total	56,993	100.0%	68,345	100.0%	19.9%

Table 27.A.14
Group Quarters Population
 27. Remainder of Lorain 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	3,691	79.1%	4,045	77.7%	9.6%
Juvenile Facilities	.	.	4	.1%	.
Nursing Homes	951	20.4%	1,156	22.2%	21.6%
Other Institutions	23	.5%	0	.0%	-100.0%
Total	4,665	100.0%	5,205	100.0%	11.6%
Noninstitutionalized					
College Dormitories	1,849	85.5%	2,198	90.6%	18.9%
Military Quarters	0	.0%	0	.0%	%
Other Noninstitutional	313	14.5%	227	9.4%	-27.5%
Total	2,162	31.7%	2,425	31.8%	12.2%
Total Group Quarters Population	6,827	100.0%	7,630	100.0%	11.8%

Table 27.A.15
Overcrowding and Severe Overcrowding
 27. Remainder of Lorain 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	
					Households	% of Total	
Owner							
2000 Census	47,506	99.2%	314	.7%	51	.1%	47,871
2010 ACS	55,436	99.7%	140	.3%	34	.1%	55,610
Renter							
2000 Census	8,883	97.2%	193	2.1%	63	.7%	9,139
2010 ACS	10,341	97.7%	211	2.0%	28	.3%	10,580
Total							
2000 Census	56,389	98.9%	507	.9%	114	.2%	57,010
2010 ACS	65,777	99.4%	351	.5%	62	.1%	66,190

Table 27.A.16
Households with Incomplete Plumbing Facilities
 27. Remainder of Lorain County
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Plumbing Facilities	56,890	66,042
Lacking Complete Plumbing Facilities	120	148
Total Households	57,010	66,190
Percent Lacking	.2%	.2%

Table 27.A.17
Households with Incomplete Kitchen Facilities
 27. Remainder of Lorain County
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Kitchen Facilities	56,856	65,846
Lacking Complete Kitchen Facilities	154	344
Total Households	57,010	66,190
Percent Lacking	.3%	.5%

Table 27.A.18
Cost Burden and Severe Cost Burden by Tenure
 27. Remainder of Lorain 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	24,848	77.4%	5,003	15.6%	2,167	6.8%	65	.2%	32,083
2010 ACS	27,493	68.7%	8,186	20.5%	4,195	10.5%	134	.3%	40,008
Owner Without a Mortgage									
2000 Census	9,680	90.1%	659	6.1%	319	3.0%	86	.8%	10,744
2010 ACS	13,466	86.3%	1,233	7.9%	835	5.4%	68	.4%	15,602
Renter									
2000 Census	5,191	58.4%	1,668	18.8%	1,154	13.0%	870	9.8%	8,883
2010 ACS	4,900	46.3%	2,176	20.6%	2,425	22.9%	1,079	10.2%	10,580
Total									
2000 Census	39,719	76.8%	7,330	14.2%	3,640	7.0%	1,021	2.0%	51,710
2010 ACS	45,859	69.3%	11,595	17.5%	7,455	11.3%	1,281	1.9%	66,190

Table 27.A.19
Median Housing Costs
 27. Remainder of Lorain County
 2000 Census SF3 & 2010 Five-Year ACS Data

Housing Cost	2000 Census	2010 ACS
Median Contract Rent	\$-403	\$-487
Median Home Value	\$-67,500	\$-67,400

B. BLS DATA

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

Table 27.B.1
Labor Force Statistics
 27. Remainder of Lorain County
 1990–2011 BLS Data

Year	Labor Force	Employment	Unemployment	Unemployment Rate	Statewide Unemployment Rate
1990	74,155	69,542	4,613	6.2%	5.7%
1991	73,533	67,963	5,570	7.6%	6.6%
1992	73,996	68,503	5,493	7.4%	7.4%
1993	74,262	70,119	4,143	5.6%	6.7%
1994	75,990	72,024	3,966	5.2%	5.6%
1995	77,023	72,877	4,146	5.4%	4.9%
1996	77,853	74,226	3,627	4.7%	5.0%
1997	79,281	75,868	3,413	4.3%	4.6%
1998	79,996	76,979	3,017	3.8%	4.3%
1999	80,942	78,103	2,839	3.5%	4.3%
2000	85,865	83,209	2,656	3.1%	4.0%
2001	86,494	83,319	3,175	3.7%	4.4%
2002	86,498	82,853	3,645	4.2%	5.7%
2003	90,876	85,713	5,163	5.7%	6.2%
2004	91,230	86,268	4,962	5.4%	6.1%
2005	92,835	87,766	5,069	5.5%	5.9%
2006	95,544	90,322	5,222	5.5%	5.4%
2007	97,607	91,853	5,754	5.9%	5.6%
2008	99,244	92,508	6,736	6.8%	6.5%
2009	98,617	89,620	8,997	9.1%	10.1%
2010	99,508	90,951	8,557	8.6%	10.0%
2011	99,556	92,155	7,401	7.4%	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.¹¹ The information presented in this section presents detailed HMDA data, including denial rates and predatory lending including high annual percentage rate (APR) loans.

Table 27.C.1
Purpose of Loan by Year
 27. Remainder of Lorain County
 2004–2011 HMDA Data

Purpose	2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	6,821	7,279	6,558	4,574	3,561	3,450	3,213	2,954	38,410
Home Improvement	1,105	1,429	1,327	1,138	908	506	389	368	7,170
Refinancing	11,044	10,984	9,270	6,492	4,723	7,714	7,331	6,427	63,985
Total	18,970	19,692	17,155	12,204	9,192	11,670	10,933	9,749	109,565

Table 27.C.2
Occupancy Status for Home Purchase Loan Applications
 27. Remainder of Lorain County
 2004–2011 HMDA Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	Total
Owner-Occupied	6,487	6,883	6,153	4,294	3,353	3,325	3,093	2,800	36,388
Not Owner-Occupied	296	377	396	273	206	124	116	152	1,940
Not Applicable	38	19	9	7	2	1	4	2	82
Total	6,821	7,279	6,558	4,574	3,561	3,450	3,213	2,954	38,410

Table 27.C.3
Owner-Occupied Home Purchase Loan Applications by Loan Type
 27. Remainder of Lorain County
 2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Conventional	5,765	6,161	5,582	3,773	2,024	1,412	1,421	1,352	27,490
FHA - Insured	611	598	456	416	1,164	1,633	1,448	1,192	7,518
VA - Guaranteed	106	118	111	95	156	222	195	196	1,199
Rural Housing Service or Farm Service Agency	5	6	4	10	9	58	29	60	181
Total	6,487	6,883	6,153	4,294	3,353	3,325	3,093	2,800	36,388

¹¹ 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 27.C.4
Loan Applications by Action Taken
 27. Remainder of Lorain County
 2004–2011 HMDA Data

Action	2004	2005	2006	2007	2008	2009	2010	2011	Total
Loan Originated	3,899	4,036	3,475	2,501	1,906	1,754	1,651	1,489	20,711
Application Approved but not Accepted	344	354	348	199	145	79	78	70	1,617
Application Denied	468	556	499	362	299	206	227	164	2,781
Application Withdrawn by Applicant	369	429	329	169	152	166	143	126	1,883
File Closed for Incompleteness	121	116	89	53	29	28	40	26	502
Loan Purchased by the Institution	1,286	1,388	1,411	1,008	819	1,092	954	925	8,883
Preapproval Request Denied	0	4	2	2	3	0	0	0	11
Preapproval Approved but not Accepted	0	0	0	0	0	0	0	0	0
Total	6,487	6,883	6,153	4,294	3,353	3,325	3,093	2,800	36,388
Denial Rate	10.7%	12.1%	12.6%	12.6%	13.6%	10.5%	12.1%	9.9%	11.8%

Table 27.C.5
Denial Rates by Gender of Applicant
 27. Remainder of Lorain County
 2004–2011 HMDA Data

Year	Male	Female	Not Available	Not Applicable	Average
2004	9.3%	12.7%	34.7%	.0%	10.7%
2005	10.5%	13.6%	39.2%	33.3%	12.1%
2006	10.5%	16.9%	23.1%	%	12.6%
2007	11.4%	13.9%	28.7%	50.0%	12.6%
2008	12.3%	15.8%	24.6%	%	13.6%
2009	9.4%	13.6%	7.5%	.0%	10.5%
2010	10.5%	14.5%	25.4%	%	12.1%
2011	9.6%	9.5%	20.3%	%	9.9%
Average	10.4%	14.1%	28.0%	28.6%	11.8%

Table 27.C.6
Loan Applications by Selected Action Taken by Gender of Applicant
 27. Remainder of Lorain County
 2004–2011 HMDA Data

Gender		2004	2005	2006	2007	2008	2009	2010	2011	Total
Male	Originated	2,875	2,986	2,510	1,774	1,371	1,247	1,182	1,059	15,004
	Denied	294	351	294	229	193	129	139	112	1,741
	Denial Rate	9.3%	10.5%	10.5%	11.4%	12.3%	9.4%	10.5%	9.6%	10.4%
Female	Originated	957	969	882	664	492	469	419	383	5,235
	Denied	139	153	180	107	92	74	71	40	856
	Denial Rate	12.7%	13.6%	16.9%	13.9%	15.8%	13.6%	14.5%	9.5%	14.1%
Not Available	Originated	66	79	83	62	43	37	50	47	467
	Denied	35	51	25	25	14	3	17	12	182
	Denial Rate	34.7%	39.2%	23.1%	28.7%	24.6%	7.5%	25.4%	20.3%	28.0%
Not Applicable	Originated	1	2	0	1	0	1	0	0	5
	Denied	0	1	0	1	0	0	0	0	2
	Denial Rate	.0%	33.3%	%	50.0%	%	.0%	%	%	28.6%
Total	Originated	3,899	4,036	3,475	2,501	1,906	1,754	1,651	1,489	20,711
	Denied	468	556	499	362	299	206	227	164	2,781
	Denial Rate	10.7%	12.1%	12.6%	12.6%	13.6%	10.5%	12.1%	9.9%	11.8%

Table 27.C.7
Denial Rates by Race/Ethnicity of Applicant
 27. Remainder of Lorain County
 2004–2011 HMDA Data

Race/Ethnicity	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	23.1%	20.0%	58.3%	.0%	.0%	.0%	42.9%	42.9%	26.9%
Asian	4.6%	9.7%	20.0%	11.1%	17.6%	16.7%	3.7%	16.7%	12.5%
Black	17.7%	22.2%	13.4%	24.5%	20.0%	29.6%	25.8%	12.5%	20.2%
White	9.8%	10.8%	11.7%	11.7%	12.9%	10.3%	11.3%	9.2%	10.9%
Not Available	25.5%	27.3%	23.8%	24.2%	23.3%	7.7%	20.8%	16.0%	23.2%
Not Applicable	.0%	33.3%	%	50.0%	%	0.0%	0%	%	12.5%
Average	10.7%	12.1%	12.6%	12.6%	13.6%	10.5%	12.1%	9.9%	11.8%
Non-Hispanic	10.2%	11.0%	11.6%	11.8%	12.9%	10.1%	11.4%	9.2%	11.1%
Hispanic	14.6%	11.7%	14.4%	17.5%	15.8%	13.5%	7.7%	5.4%	13.2%

Table 27.C.8
Loan Applications by Selected Action Taken by Race/Ethnicity of Applicant
 27. Remainder of Lorain County
 2004–2011 HMDA Data

Race		2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Originated	10	8	5	4	7	7	4	4	49
	Denied	3	2	7	0	0	0	3	3	18
	Denial Rate	23.1%	20.0%	58.3%	.0%	.0%	42.9%	42.9%	42.9%	26.9%
Asian	Originated	62	65	60	32	28	30	26	20	323
	Denied	3	7	15	4	6	6	1	4	46
	Denial Rate	4.6%	9.7%	20.0%	11.1%	17.6%	16.7%	3.7%	16.7%	12.5%
Black	Originated	51	56	58	40	28	19	23	21	296
	Denied	11	16	9	13	7	8	8	3	75
	Denial Rate	17.7%	22.2%	13.4%	24.5%	20.0%	29.6%	25.8%	12.5%	20.2%
White	Originated	3,579	3,676	3,211	2,305	1,764	1,625	1,514	1,365	19,039
	Denied	387	444	424	306	262	186	193	139	2,341
	Denial Rate	9.8%	10.8%	11.7%	11.7%	12.9%	10.3%	11.3%	9.2%	10.9%
Not Available	Originated	187	229	141	119	79	72	84	79	990
	Denied	64	86	44	38	24	6	22	15	299
	Denial Rate	25.5%	27.3%	23.8%	24.2%	23.3%	7.7%	20.8%	16.0%	23.2%
Not Applicable	Originated	10	2	0	1	0	1	0	0	14
	Denied	0	1	0	1	0	0	0	0	2
	Denial Rate	25.5%	27.3%	23.8%	24.2%	23.3%	7.7%	20.8%	16.0%	12.5%
Total	Originated	3,899	4,036	3,475	2,501	1,906	1,754	1,651	1,489	20,711
	Denied	468	556	499	362	299	206	227	164	2,781
	Denial Rate	10.7%	12.1%	12.6%	12.6%	13.6%	10.5%	12.1%	9.9%	11.8%
Non-Hispanic	Originated	3,162	3,666	3,239	2,332	1,775	1,630	1,540	1,384	18,728
	Denied	359	455	425	312	264	183	199	140	2,337
	Denial Rate	10.2%	11.0%	11.6%	11.8%	12.9%	10.1%	11.4%	9.2%	11.1%
Hispanic	Originated	70	91	83	52	48	45	36	35	460
	Denied	12	12	14	11	9	7	3	2	70
	Denial Rate	14.6%	11.7%	14.4%	17.5%	15.8%	13.5%	7.7%	5.4%	13.2%

Table 27.C.9
Loan Applications by Reason for Denial
 27. Remainder of Lorain County
 2004–2011 HMDA Data

Denial Reason	2004	2005	2006	2007	2008	2009	2010	2011	Total
Debt-to-Income Ratio	54	82	61	68	70	52	67	33	487
Employment History	7	5	10	8	5	2	8	1	46
Credit History	117	125	107	83	59	50	43	38	622
Collateral	36	48	41	36	60	38	42	30	331
Insufficient Cash	15	12	15	10	5	1	5	7	70
Unverifiable Information	20	22	20	17	19	6	8	5	117
Credit Application Incomplete	44	49	35	35	11	8	7	16	205
Mortgage Insurance Denied	0	3	0	0	2	2	1	0	8
Other	65	116	86	41	18	18	18	17	379
Missing	110	94	124	64	50	29	28	17	516
Total	468	556	499	362	299	206	227	164	2,781

Table 27.C.10
Denial Rates by Income of Applicant
 27. Remainder of Lorain County
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	35.7%	33.3%	31.6%	44.4%	25.0%	57.9%	50.0%	40.0%	40.2%
\$15,001–\$30,000	23.6%	25.9%	30.5%	25.9%	28.6%	21.3%	23.0%	16.3%	25.1%
\$30,001–\$45,000	14.7%	15.4%	19.9%	16.7%	14.5%	9.1%	13.9%	11.0%	15.0%
\$45,001–\$60,000	12.9%	12.8%	14.7%	15.2%	15.8%	13.1%	13.6%	11.4%	13.7%
\$60,001–\$75,000	7.6%	10.5%	11.3%	14.2%	13.0%	12.3%	10.2%	12.1%	11.0%
Above \$75,000	5.7%	7.7%	6.9%	7.1%	9.5%	5.0%	8.1%	6.8%	7.1%
Data Missing	14.5%	18.0%	8.7%	16.7%	7.7%	26.3%	39.1%	26.3%	14.9%
Total	10.7%	12.1%	12.6%	12.6%	13.6%	10.5%	12.1%	9.9%	11.8%

Table 27.C.11
Denial Rates of Loans by Race/Ethnicity and Income of Applicant
 27. Remainder of Lorain County
 2004–2011 HMDA Data

Race	<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	Above \$75K	Data Missing	Average
American Indian	%	57.1%	12.5%	33.3%	33.3%	17.9%	%	26.9%
Asian	50.0%	60.0%	12.9%	23.6%	6.8%	7.0%	8.3%	12.5%
Black	%	41.7%	21.2%	23.4%	14.9%	16.9%	28.6%	20.2%
White	43.0%	23.4%	13.9%	12.6%	10.4%	6.5%	11.5%	10.9%
Not Available	21.4%	43.8%	32.0%	26.2%	18.8%	13.6%	49.2%	23.2%
Not Applicable	%	.0%	50.0%	.0%	.0%	.0%	33.3%	12.5%
Average	40.2%	25.1%	15.0%	13.7%	11.0%	7.1%	14.9%	11.8%
Non-Hispanic Ethnicity	40.7%	23.6%	14.0%	13.1%	10.3%	6.6%	12.3%	11.1%
Hispanic (Ethnicity)	66.7%	26.2%	19.3%	10.6%	12.9%	8.4%	14.3%	13.2%

Table 27.C.12
Loan Applications by Reason for Denial by Race/Ethnicity of Applicant
 27. Remainder of Lorain County
 2004–2011 HMDA Data

Denial Reason	American Indian	Asian	Black	White	Not Available	Not Applicable	Total	Hispanic (Ethnicity)
Debt-to-Income Ratio	2	10	15	424	36	0	487	14
Employment History	1	2	0	41	2	0	46	2
Credit History	5	14	23	514	66	0	622	17
Collateral	3	6	5	292	24	1	331	7
Insufficient Cash	0	1	0	62	7	0	70	0
Unverifiable Information	0	1	6	98	12	0	117	4
Credit Application Incomplete	0	3	2	174	26	0	205	4
Mortgage Insurance Denied	0	0	0	8	0	0	8	1
Other	2	6	10	325	36	0	379	6
Missing	5	3	14	403	90	1	516	15
Total	18	46	75	2,341	299	2	2,781	70
% Missing	27.8%	6.5%	18.7%	17.2%	30.1%	50.0%	18.6%	21.4%

Table 27.C.13
Loan Applications by Income of Applicant: Originated and Denied
 27. Remainder of Lorain County
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Loan Originated	18	8	13	5	3	8	3	3	61
	Application Denied	10	4	6	4	1	11	3	2	41
	Denial Rate	35.7%	33.3%	31.6%	44.4%	25.0%	57.9%	50.0%	40.0%	40.2%
\$15,001–\$30,000	Loan Originated	223	234	171	149	125	140	127	87	1,256
	Application Denied	69	82	75	52	50	38	38	17	421
	Denial Rate	23.6%	25.9%	30.5%	25.9%	28.6%	21.3%	23.0%	16.3%	25.1%
\$30,001–\$45,000	Loan Originated	658	615	488	364	289	311	272	252	3,249
	Application Denied	113	112	121	73	49	31	44	31	574
	Denial Rate	14.7%	15.4%	19.9%	16.7%	14.5%	9.1%	13.9%	11.0%	15.0%
\$45,001–\$60,000	Loan Originated	706	811	603	423	368	292	274	272	3,749
	Application Denied	105	119	104	76	69	44	43	35	595
	Denial Rate	12.9%	12.8%	14.7%	15.2%	15.8%	13.1%	13.6%	11.4%	13.7%
\$60,001–\$75,000	Loan Originated	611	639	489	356	281	285	230	174	3,065
	Application Denied	50	75	62	59	42	40	26	24	378
	Denial Rate	7.6%	10.5%	11.3%	14.2%	13.0%	12.3%	10.2%	12.1%	11.0%
Above \$75,000	Loan Originated	1,500	1,579	1,512	1,159	816	704	731	687	8,688
	Application Denied	90	131	112	89	86	37	64	50	659
	Denial Rate	5.7%	7.7%	6.9%	7.1%	9.5%	5.0%	8.1%	6.8%	7.1%
Data Missing	Loan Originated	183	150	199	45	24	14	14	14	643
	Application Denied	31	33	19	9	2	5	9	5	113
	Denial Rate	14.5%	18.0%	8.7%	16.7%	7.7%	26.3%	39.1%	26.3%	14.9%
Total	Loan Originated	3,899	4,036	3,475	2,501	1,906	1,754	1,651	1,489	20,711
	Application Denied	468	556	499	362	299	206	227	164	2,781
	Denial Rate	10.7%	12.1%	12.6%	12.6%	13.6%	10.5%	12.1%	9.9%	11.8%

Table 27.C.14
Loan Applications by Income and Race/Ethnicity of Applicant: Originated and Denied
 27. Remainder of Lorain 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	7	8	8	23	0	49
	Application Denied	0	4	1	4	4	5	0	18
	Denial Rate	%	57.1%	12.5%	33.3%	33.3%	17.9%	%	26.9%
Asian	Loan Originated	1	4	27	55	41	173	22	323
	Application Denied	1	6	4	17	3	13	2	46
	Denial Rate	50.0%	60.0%	12.9%	23.6%	6.8%	7.0%	8.3%	12.5%
Black	Loan Originated	0	14	41	49	74	108	10	296
	Application Denied	0	10	11	15	13	22	4	75
	Denial Rate	%	41.7%	21.2%	23.4%	14.9%	16.9%	28.6%	20.2%
White	Loan Originated	49	1,183	3,035	3,478	2,798	7,919	577	19,039
	Application Denied	37	362	492	503	325	547	75	2,341
	Denial Rate	43.0%	23.4%	13.9%	12.6%	10.4%	6.5%	11.5%	10.9%
Not Available	Loan Originated	11	50	138	158	143	458	32	990
	Application Denied	3	39	65	56	33	72	31	299
	Denial Rate	21.4%	43.8%	32.0%	26.2%	18.8%	13.6%	49.2%	23.2%
Not Applicable	Loan Originated	0	2	1	1	1	7	2	14
	Application Denied	0	0	1	0	0	0	1	2
	Denial Rate	%	.0%	50.0%	.0%	.0%	.0%	33.3%	12.5%
Total	Loan Originated	61	1,256	3,249	3,749	3,065	8,688	643	20,711
	Application Denied	41	421	574	595	378	659	113	2,781
	Denial Rate	40.2%	25.1%	15.0%	13.7%	11.0%	7.1%	14.9%	11.8%
Non-Hispanic Ethnicity	Loan Originated	51	1,153	2,979	3,406	2,764	7,818	557	18,728
	Application Denied	35	357	485	514	318	550	78	2,337
	Denial Rate	40.7%	23.6%	14.0%	13.1%	10.3%	6.6%	12.3%	11.1%
Hispanic (Ethnicity)	Loan Originated	1	31	67	101	74	174	12	460
	Application Denied	2	11	16	12	11	16	2	70
	Denial Rate	66.7%	26.2%	19.3%	10.6%	12.9%	8.4%	14.3%	13.2%

PREDATORY LENDING

Table 27.C.15
Originated Owner-Occupied Loans by HAL Status
 27. Remainder of Lorain County
 2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Other	3,571	3,342	2,894	2,269	1,742	1,645	1,626	1,466	18,555
HAL	328	694	581	232	164	109	25	23	2,156
Total	3,899	4,036	3,475	2,501	1,906	1,754	1,651	1,489	20,711
Percent HAL	8.4%	17.2%	16.7%	9.3%	8.6%	6.2%	1.5%	1.5%	10.4%

Table 27.C.16
Loans by Loan Purpose by HAL Status
 27. Remainder of Lorain County
 2004–2011 HMDA Data

Loan Purpose		2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	Other	3,571	3,342	2,894	2,269	1,742	1,645	1,626	1,466	18,555
	HAL	328	694	581	232	164	109	25	23	2,156
	Percent HAL	8.4%	17.2%	16.7%	9.3%	8.6%	6.2%	1.5%	1.5%	10.4%
Home Improvement	Other	275	404	388	397	339	174	139	154	2,270
	HAL	89	108	109	58	32	18	14	11	439
	Percent HAL	24.5%	21.1%	21.9%	12.7%	8.6%	9.4%	9.2%	6.7%	16.2%
Refinancing	Other	3,625	2,847	2,347	1,892	1,654	3,622	3,666	3,175	22,828
	HAL	592	953	853	376	168	153	13	20	3,128
	Percent HAL	14.0%	25.1%	26.7%	16.6%	9.2%	4.1%	.4%	.6%	12.1%
Total	Other	7,471	6,593	5,629	4,558	3,735	5,441	5,431	4,795	43,653
	HAL	1,009	1,755	1,543	666	164	109	25	23	5,723
	Percent HAL	11.9%	21.0%	21.5%	12.7%	8.9%	4.9%	.9%	1.1%	11.6%

Table 27.C.17
HALs Originated by Race of Borrower
 27. Remainder of Lorain County
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	1	1	0	0	0	0	0	0	2
Asian	1	7	6	1	0	1	0	0	16
Black	11	23	28	5	1	0	0	0	68
White	287	545	503	210	156	105	25	23	1,854
Not Available	28	118	44	16	7	3	0	0	216
Not Applicable	0	0	0	0	0	0	0	0	0
Total	328	694	581	232	164	109	25	23	2,156
Hispanic (Ethnicity)	2	20	27	9	5	5	2	2	72

Table 27.C.18
Rate of HALs Originated by Race/Ethnicity of Borrower
 27. Remainder of Lorain County
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	10.0%	12.5%	.0%	.0%	.0%	.0%	.0%	.0%	4.1%
Asian	1.6%	10.8%	10.0%	3.1%	.0%	3.3%	.0%	.0%	5.0%
Black	21.6%	41.1%	48.3%	12.5%	3.6%	.0%	.0%	.0%	23.0%
White	8.0%	14.8%	15.7%	9.1%	8.8%	6.5%	1.7%	1.7%	9.7%
Not Available	15.0%	51.5%	31.2%	13.4%	8.9%	4.2%	.0%	.0%	21.8%
Not Applicable	.0%	.0%	%	.0%	%	.0%	%	%	0%
Average	8.4%	17.2%	16.7%	9.3%	8.6%	6.2%	01.5%	01.5%	10.4%
Non-Hispanic Ethnicity	8.8%	14.5%	15.5%	9.0%	8.5%	6.3%	1.5%	1.4%	9.7%
Hispanic (Ethnicity)	2.9%	22.0%	32.5%	17.3%	10.4%	11.1%	5.6%	5.7%	15.7%

Table 27.C.19
Loans by HAL Status by Race/Ethnicity of Borrower
 27. Remainder of Lorain County
 2004–2011 HMDA Data

Race	Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Other	9	7	5	4	7	7	4	4	47
	HAL	1	1	0	0	0	0	0	0	2
	Percent HAL	10.0%	12.5%	.0%	.0%	.0%	.0%	.0%	.0%	4.1%
Asian	Other	61	58	54	31	28	29	26	20	307
	HAL	1	7	6	1	0	1	0	0	16
	Percent HAL	1.6%	10.8%	10.0%	3.1%	.0%	3.3%	.0%	.0%	5.0%
Black	Other	40	33	30	35	27	19	23	21	228
	HAL	11	23	28	5	1	0	0	0	68
	Percent HAL	21.6%	41.1%	48.3%	12.5%	3.6%	.0%	.0%	.0%	23.0%
White	Other	3,292	3,131	2,708	2,095	1,608	1,520	1,489	1,342	17,185
	HAL	287	545	503	210	156	105	25	23	1,854
	Percent HAL	8.0%	14.8%	15.7%	9.1%	8.8%	6.5%	01.7%	01.7%	9.7%
Not Available	Other	159	111	97	103	72	69	84	79	774
	HAL	28	118	44	16	7	3	0	0	216
	Percent HAL	15.0%	51.5%	31.2%	13.4%	8.9%	4.2%	.0%	.0%	21.8%
Not Applicable	Other	10	2	0	1	0	1	0	0	14
	HAL	0	0	0	0	0	0	0	0	0
	Percent HAL	.0%	.0%	%	.0%	%	.0%	%	%	0.0%
Total	Other	3,571	3,342	2,894	2,269	1,742	1,645	1,626	1,466	18,555
	HAL	328	694	581	232	164	109	25	23	2,156
	Percent HAL	8.4%	17.2%	16.7%	9.3%	8.6%	6.2%	1.5%	1.5%	10.4%
Non-Hispanic Ethnicity	Other	2,885	3,133	2,738	2,121	1,625	1,527	1,517	1,364	16,910
	HAL	277	533	501	211	150	103	23	20	1,818
	Percent HAL	8.8%	14.5%	15.5%	9.0%	8.5%	6.3%	1.5%	1.4%	9.7%
Hispanic (Ethnicity)	Other	68	71	56	43	43	40	34	33	388
	HAL	2	20	27	9	5	5	2	2	72
	Percent HAL	2.9%	22.0%	32.5%	17.3%	10.4%	11.1%	5.6%	5.7%	15.7%

Table 27.C.20
Rates of HALs by Income of Borrower
 27. Remainder of Lorain County
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Average
\$15,000 or Below	11.1%	25.0%	7.7%	.0%	.0%	.0%	.0%	.0%	8.2%
\$15,001–\$30,000	14.3%	23.5%	26.3%	18.8%	20.0%	12.9%	5.5%	6.9%	17.2%
\$30,001–\$45,000	13.8%	25.9%	23.4%	15.1%	11.4%	7.7%	3.7%	3.6%	15.2%
\$45,001–\$60,000	10.3%	22.8%	23.5%	12.1%	10.3%	6.5%	.7%	.7%	13.7%
\$60,001–\$75,000	9.5%	14.2%	19.0%	7.6%	7.5%	5.6%	.4%	.6%	10.0%
Above \$75,000	4.7%	11.1%	9.0%	4.8%	5.5%	4.5%	0.7%	.7%	6.0%
Data Missing	1.1%	18.0%	25.1%	33.3%	8.3%	.0%	.0%	.0%	14.9%
Average	8.4%	17.2%	16.7%	9.3%	8.6%	6.2%	1.5%	1.5%	10.4%

Table 27.C.21
Loans by HAL Status by Income of Borrower
 27. Remainder of Lorain County
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Other	16	6	12	5	3	8	3	3	56
	HAL	2	2	1	0	0	0	0	0	5
	Percent HAL	11.1%	25.0%	7.7%	.0%	.0%	.0%	.0%	.0%	8.2%
\$15,001–\$30,000	Other	191	179	126	121	100	122	120	81	1,040
	HAL	32	55	45	28	25	18	7	6	216
	Percent HAL	14.3%	23.5%	26.3%	18.8%	20.0%	12.9%	5.5%	6.9%	17.2%
\$30,001–\$45,000	Other	567	456	374	309	256	287	262	243	2,754
	HAL	91	159	114	55	33	24	10	9	495
	Percent HAL	13.8%	25.9%	23.4%	15.1%	11.4%	7.7%	3.7%	3.6%	15.2%
\$45,001–\$60,000	Other	633	626	461	372	330	273	272	270	3,237
	HAL	73	185	142	51	38	19	2	2	512
	Percent HAL	10.3%	22.8%	23.5%	12.1%	10.3%	6.5%	.7%	.7%	13.7%
\$60,001–\$75,000	Other	553	548	396	329	260	269	229	173	2,757
	HAL	58	91	93	27	21	16	1	1	308
	Percent HAL	9.5%	14.2%	19.0%	7.6%	7.5%	5.6%	.4%	.6%	10.0%
Above \$75,000	Other	1,430	1,404	1,376	1,103	771	672	726	682	8,164
	HAL	70	175	136	56	45	32	5	5	524
	Percent HAL	4.7%	11.1%	9.0%	4.8%	5.5%	4.5%	.7%	.7%	6.0%
Data Missing	Other	181	123	149	30	22	14	14	14	547
	HAL	2	27	50	15	2	0	0	0	96
	Percent HAL	1.1%	18.0%	25.1%	33.3%	8.3%	.0%	.0%	.0%	14.9%
Total	Other	3,571	3,342	2,894	2,269	1,742	1,645	1,626	1,466	18,555
	HAL	328	694	581	232	164	109	25	23	2,156
	Percent HAL	8.4%	17.2%	16.7%	9.3%	8.6%	6.2%	1.5%	1.5%	10.4%

D. CRA DATA

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

Table 27.D.1
Small Business Loans Originated: \$100,000 or Less by Tract MFI
 27. Remainder of Lorain 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	32	1,435	848		2,315
2001	0	32	1,597	968		2,597
2002	0	43	2,086	1,167		3,296
2003	0	44	1,808	1,393		3,245
2004	0	67	1,918	1,434		3,419
2005	0	58	1,993	1,573		3,624
2006	0	83	2,701	2,424		5,208
2007	0	72	3,081	2,702		5,855
2008	0	46	2,289	2,087		4,422
2009	0	17	940	870		1,827
2010	0	18	790	718		1,526
2011	0	17	1,038	951		2,006
Total	0	529	21,676	17,135	0	39,340
Loan Amount (\$1,000s)						
2000	0	416	21,848	12,602		34,866
2001	0	246	24,282	14,455		38,983
2002	0	292	22,762	13,191		36,245
2003	0	219	19,844	15,401		35,464
2004	0	534	19,649	15,283		35,466
2005	0	383	20,585	17,113		38,081
2006	0	487	27,266	24,398		52,151
2007	0	541	30,845	27,550		58,936
2008	0	258	20,171	22,293		42,722
2009	0	326	10,087	9,022		19,435
2010	0	262	9,902	10,044		20,208
2011	0	253	14,955	14,882		30,090
Total	0	4,217	242,196	196,234	0	442,647

Table 27.D.2
Small Business Loans Originated: \$100,001 to \$250,000 by Tract MFI
 27. Remainder of Lorain 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	2	79	49		130
2001	0	2	126	91		219
2002	0	1	87	71		159
2003	0	3	62	68		133
2004	0	5	50	64		119
2005	0	1	39	57		97
2006	0	0	36	74		110
2007	0	5	43	48		96
2008	0	1	47	33		81
2009	0	1	24	31		56
2010	0	0	38	41		79
2011	0	1	46	34		81
Total	0	22	677	661	0	1,360
Loan Amount (\$1,000s)						
2000	0	367	13,188	8,760		22,315
2001	0	282	21,472	15,830		37,584
2002	0	167	15,070	12,351		27,588
2003	0	599	10,640	11,835		23,074
2004	0	704	9,263	11,504		21,471
2005	0	150	6,878	9,597		16,625
2006	0	0	6,389	13,700		20,089
2007	0	799	7,822	8,583		17,204
2008	0	150	7,830	5,856		13,836
2009	0	150	3,732	5,697		9,579
2010	0	0	6,744	7,331		14,075
2011	0	148	7,932	6,079		14,159
Total	0	3,516	116,960	117,123	0	237,599

Table 27.D.3
Small Business Loans Originated: More than \$250,000 by Tract MFI
 27. Remainder of Lorain 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	2	61	61		124
2001	0	3	96	69		168
2002	0	5	65	63		133
2003	0	4	57	50		111
2004	0	1	47	56		104
2005	0	0	38	38		76
2006	0	0	52	48		100
2007	0	0	54	40		94
2008	0	1	30	46		77
2009	0	0	26	31		57
2010	0	0	48	53		101
2011	0	0	40	38		78
Total	0	16	614	593	0	1,223
Loan Amount (\$1,000s)						
2000	0	698	26,934	27,010		54,642
2001	0	974	47,726	33,100		81,800
2002	0	2,179	30,783	31,523		64,485
2003	0	2,583	27,052	25,036		54,671
2004	0	350	23,632	29,050		53,032
2005	0	0	17,015	20,429		37,444
2006	0	0	24,489	24,002		48,491
2007	0	0	27,298	22,986		50,284
2008	0	520	16,570	24,458		41,548
2009	0	0	12,466	16,583		29,049
2010	0	0	25,704	26,988		52,692
2011	0	0	19,744	19,647		39,391
Total	0	7,304	299,413	300,812	0	607,529

Table 27.D.4
Small Business Loans to Businesses with Gross Annual Revenues of Less Than \$1 Million by Tract MFI
 27. Remainder of Lorain 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	15	621	368		1,004
2001	0	13	760	452		1,225
2002	0	14	583	323		920
2003	0	16	624	467		1,107
2004	0	24	646	476		1,146
2005	0	16	883	704		1,603
2006	0	33	1,059	924		2,016
2007	0	31	1,218	1,016		2,265
2008	0	9	782	627		1,418
2009	0	4	316	310		630
2010	0	5	297	287		589
2011	0	9	477	469		955
Total	0	189	8,266	6,423	0	14,878
Loan Amount (\$1,000s)						
2000	0	1,144	30,794	16,886		48,824
2001	0	727	47,172	27,002		74,901
2002	0	784	35,377	24,536		60,697
2003	0	728	27,015	21,959		49,702
2004	0	684	21,257	16,823		38,764
2005	0	67	15,725	19,053		34,845
2006	0	257	24,794	23,274		48,325
2007	0	608	27,818	20,844		49,270
2008	0	101	18,706	17,912		36,719
2009	0	108	12,132	8,738		20,978
2010	0	112	12,670	14,698		27,480
2011	0	208	13,577	13,047		26,832
Total	0	5,528	287,037	224,772	0	517,337

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 27.E.1
Fair Housing Complaints by Basis
27. Remainder of Lorain County
2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability	1	7	0	1	4	0	1	1		15
Family Status	0		0		1	6	0	4	2	13
National Origin		0	0		0	2	0		2	4
Race	0	5	0	2	2	0	1	0	2	12
Religion		0	0		1				2	3
Sex	0	1	0	0	1		0	1		3
Total Bases	1	13	0	3	9	8	2	6	8	50
Total Complaints	1	10	0	3	8	8	2	6	2	40

Table 27.E.2
Fair Housing Complaints by Issue
27. Remainder of Lorain County
2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Discriminatory terms, conditions, privileges, or services and facilities		2	0	1	2	0	0	1	2	8
Discriminatory refusal to rent	0	3	0	1	3	0	0			7
Discriminatory advertisement - rental					0	6			0	6
Failure to make reasonable accommodation	0	2	0	1		0	1	1		5
Discrimination in terms, conditions or privileges relating to rental	0	3	0	0	0	0	1	0		4
Non-compliance with design and construction requirements (handicap)		2			2					4
Discriminatory advertising, statements, and notices						0	0	3		3
Discriminatory acts under Section 818 (coercion, etc.)	0	0		1		0		2		3
Discrimination in terms, conditions, privileges relating to sale		1			0			1		2
Otherwise deny or make housing available							0	2		2
Other discriminatory acts			0	1		1				2
Discriminatory advertising - sale					1					1
Discrimination in the terms or conditions for making loans								1		1
Discriminatory brokerage service					1					1
Refusing to provide municipal services or property						1				1
Using ordinances to discriminate in zoning and land use						1				1
Failure to permit reasonable modification	1									1
Total Issues	1	13	0	5	9	9	2	11	2	52
Total Complaints	1	10	0	3	8	8	2	6	2	40

Table 27.E.3
Fair Housing Complaints by Closure Status
 27. Remainder of Lorain County
 2004–2012 HUD Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Administrative Closure Cause (FHAP)	0	1	0		1	0	0			2
Conciliated / Settled		2			2	5		1		10
No Cause	1	1	0	1	4	1	2	2		12
Open	0	6	0	2	1	2	0	2		13
								1	2	3
Total Complaints	1	10	0	3	8	8	2	6	2	40

HUD Complaints Found With Cause

Table 27.E.4
Fair Housing Complaints Found With Cause by Basis
 27. Remainder of Lorain County
 2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability	1	3		1	3	0	1	1		10
Family Status			0		1	6		2		9
Race	0	0	0	0	2		1			3
Total Bases	1	3	0	1	6	6	2	3		22
Total Complaints	1	3	0	1	6	6	2	3		22

Table 27.E.5
Fair Housing Complaints Found With Cause by Issue
 27. Remainder of Lorain County
 2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Discriminatory advertisement - rental					0	6				6
Discriminatory refusal to rent			0	1	0	3	0	0		4
Non-compliance with design and construction requirements (handicap)				2		2				4
Failure to make reasonable accommodation		0	0		1		0	1	1	3
Discriminatory advertising, statements, and notices						0		2		2
Discriminatory advertising - sale					1					1
Discriminatory terms, conditions, privileges, or services and facilities					1					1
Discrimination in terms, conditions or privileges relating to rental			0	0	0	0	0	1		1
Failure to permit reasonable modification	1									1
Total Issues	1	3	0	1	7	6	2	3	0	23
Total Complaints	1	3	0	1	6	6	2	3		22

OHIO CIVIL RIGHTS COMMISSION COMPLAINTS

Table 27.E.6
Fair Housing Complaints by Basis
 27. Remainder of Lorain County
 2004–2012 OCR Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color	1		0		1					2
Disability	1	4	0	1	3	0	0	0		9
Family Status	0	1	0	0	1	1	2	6		11
Gender	0		0	0	2		0	0		2
National Origin	0	0			2	1				3
Race	1	6	0	1	0	0	0	0		10
Religion			0	0	1					1
Retaliation	0	0	0	0	1	0	0	1		2
Total Bases	3	11	0	2	13	2	2	7	0	40
Total Complaints	2	9	0	2	9	2	2	6		32

Table 27.E.7
Fair Housing Complaints by Issue
 27. Remainder of Lorain County
 2004–2012 OCR Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Advertising					1	1	2	3		7
Exclusion	0	7		0	2	0	0			9
Harassment	0	3				0				3
Other	1	3	0	1	5	0	0			10
Reasonable Accommodation	1	2	0	1	1			0		5
Sexual Harassment		1		0						1
Terms and Conditions	0	2	0	0	3	1	0	3		9
Total Issues	2	18	0	2	12	2	2	6	0	44
Total Complaints	2	9	0	2	9	2	2	6		32

Table 27.E.8
Fair Housing Complaints by Closure Status
 27. Remainder of Lorain County
 2004–2012 OCR Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
CP Withdrawal – No Benefit	0	1					0	1		2
Failure to Locate Charging Party					1					1
No Cause Finding Issued	1	7	0	0	2	1	1	3		15
Settlement With Benefits	1	0	0	1	1	1	0	2		6
Successful Conciliation				1	1		1			3
Withdrawal With Benefits	0	1	0	0	4	0	0	0		5
Total Complaints	2	9	0	2	9	2	2	6	0	32

FAIR HOUSING CONTACT SERVICE COMPLAINTS

Table 27.E.9
Fair Housing Complaints by Basis
 27. Remainder of Lorain County
 2004–2012 FHCS Data

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

Table 27.E.10
Fair Housing Complaints by Closure Status
 27. Remainder of Lorain County
 2004–2012 FHCS Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Inquiry			1							1
Settled						1				1
Total Complaints	0	0	1	0	0	1	0	0	0	2

THE HOUSING RESEARCH AND ADVOCACY CENTER COMPLAINTS

Table 27.E.11
Fair Housing Complaints by Basis
 27 Remainder of Lorain County
 2004–2012 HRAC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability						1				1
National Origin				1						1
Total Bases	0	0	0	1	0	1	0	0	0	2
Total Complaints				1		1	0	0		2

Table 27.E.12
Fair Housing Complaints by Issue
 27 Remainder of Lorain County
 2004–2012 HRAC Data

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

Table 27.E.13
Fair Housing Complaints by Action Taken

27 Remainder of Lorain County
 2004–2012 HRAC Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Referred to OCRC				1		1				2
Total	0	0	0	1	0	1	0	0	0	2
Total Complaints				1		1	0	0		2

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 27.F.1

Primary Role of Respondent
 27. Remainder of Lorain County
 2012–2013 Fair Housing Survey for Housing
 Stakeholders Data

Primary Role	Total
Local Government	1
Total	1

FEDERAL, STATE, AND LOCAL LAWS

Table 27.F.2
**Familiarity with Fair
 Housing Laws**

27. Remainder of Lorain County
 2012–2013 Fair Housing Survey
 for Housing Stakeholders Data

Familiarity	Total
Not Familiar	0
Somewhat Familiar	1
Very Familiar	0
Missing	0
Total	1

Table 27.F.3
Perceptions About Fair Housing Laws

27. Remainder of Lorain 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
Are fair housing laws difficult to understand or follow?		1			1
Do you think fair housing laws should be changed?		1			1
Do you think fair housing laws are adequately enforced?	1				1

Table 27.F.4

Fair Housing Activities
 27. Remainder of Lorain County
 2012–2013 Fair Housing Survey for Housing Stakeholders Data

Question	Yes	No	Don't	Missing	Total
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Know						
Is there a training process available to learn about fair housing laws?	1					1
Have you participated in fair housing training?	1					1
Are you aware of any fair housing testing?			1			1
Testing and education	Too Little	Right Amount	Too Much	Don't Know	Missing	Total
Is there sufficient outreach and education activity?	1					1
Is there sufficient testing?	1					1

Table 27.F.5**Protected Classes**

27. Remainder of Lorain County
2012–2013 Fair Housing Survey
for Housing Stakeholders Data

Protected Class	Total
Family Status	1
Religion	1
National Origin	1
Sexual Orientation	1
Military	1
Total	5

Table 27.F.6**Fair Housing Violation Referrals**

27. Remainder of Lorain County
2012–2013 Fair Housing Survey for
Housing Stakeholders Data

Referral	Total
County	1
OCRC	1
Total	2

LOCAL FAIR HOUSING

Table 27.F.7

Local Fair Housing

27. Remainder of Lorain 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
Are there any specific geographic areas that have fair housing problems?	0	1			1
Are there any specific groups in that face housing discrimination?	1	0	0		1

FAIR HOUSING IN THE PRIVATE SECTOR

Table 27.F.8

Barriers to Fair Housing in the Private Sector

27. Remainder of Lorain 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	0	0		1
The real estate industry?			1	0	1
The mortgage and home lending industry?	1	0	0		1
The housing construction or accessible housing design fields?		0	1		1
The home insurance industry?		0	1		1
The home appraisal industry?		0	1		1
Any other housing services?		0	1		1

FAIR HOUSING IN THE PUBLIC SECTOR

Table 27.F.9

Barriers to Fair Housing in the Public Sector

27. Remainder of Lorain 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	0		1
Zoning laws?	0	1			1
Occupancy standards or health and safety codes?	0	0	1		1
Property tax policies?	0	1			1
Permitting process?	1	0			1
Housing construction standards?	0	0	1		1
Neighborhood or community development policies?	0	1			1
Limited access to government services, such as employment services?	1	0	0		1
Public administrative actions or regulations?		0	1		1

NARRATIVE COMMENTS

Federal, State, and Local Laws

Table 27.F.10

How did you become aware of fair housing laws?

27. Remainder of Lorain County
2013 Fair Housing Survey Data

Comments:
15 years of Community Development and working with Federal CDBG, HOME and other funds

Local Fair Housing**Table 27.F.11****Are there any specific geographic areas that have fair housing problems?**27. Remainder of Lorain County
2013 Fair Housing Survey Data

Comments:
Complaints cluster in higher density areas but nothing that would seem out of the norm in number of complaints in any one area

Table 27.F.12**Are there any specific groups in that face housing discrimination?**27. Remainder of Lorain County
2013 Fair Housing Survey Data

Comments:
African Americans, Hispanics would seem to be most impacted

Fair Housing in the Private Sector**Table 27.F.13****Are you aware of any questionable practices or barriers to fair housing choice in the rental housing market?**27. Remainder of Lorain County
2013 Fair Housing Survey Data

Comments:
Ongoing turnover in managers and new rental creates a lack of knowledge resulting in poor decisions

Table 27.F.14**Are you aware of any questionable practices or barriers to fair housing choice in the mortgage and home lending industry?**27. Remainder of Lorain County
2013 Fair Housing Survey Data

Comments:
Disproportionate loan denials

Table 27.F.15**Are you aware of any questionable practices or barriers to fair housing choice in the home appraisal industry?**27. Remainder of Lorain County
2013 Fair Housing Survey Data

Comments:
Have not seen anything as blatant as example cited above

Fair Housing in the Public Sector**Table 27.F.16****Are you aware of any questionable practices or barriers to fair housing choice in land use policies?**27. Remainder of Lorain County
2013 Fair Housing Survey Data

Comments:
Localities have been increasing densities allowed in areas as sewers are extended.

Table 27.F.17**Are you aware of any questionable practices or barriers to fair housing choice in occupancy standards or health and safety codes?**27. Remainder of Lorain County
2013 Fair Housing Survey Data

Comments:
Unsure, but there may be concerns more around migrant workers.

Table 27.F.18**Are you aware of any questionable practices or barriers to fair housing choice in property tax policies?**27. Remainder of Lorain County
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.

Table 27.F.19**Are you aware of any questionable practices or barriers to fair housing choice in the permitting process?**27. Remainder of Lorain County
2013 Fair Housing Survey Data

Comments:
I am not aware of a community that has translated forms into Spanish within the County.

Table 27.F.20**Are you aware of any questionable practices or barriers to fair housing choice in housing construction standards?**27. Remainder of Lorain County
2013 Fair Housing Survey Data

Comments:
Most Building Departments and architects are able to refer to online standards

Table 27.F.21**Are you aware of any barriers that limit access to government services, such as a lack of transportation or employment services?**27. Remainder of Lorain County
2013 Fair Housing Survey Data

Comments:
Public transportation has been shrinking due to budgetary constraints

Table 27.F.22**Are you aware of any questionable practices or barriers to fair housing choice in any other public administrative actions or regulations?**27. Remainder of Lorain County
2013 Fair Housing Survey Data

Comments:
There are many jurisdictions within County and cannot be sure how each is performing

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 Lorain County the received and completed the survey.¹²

Table 27.G.1
Housing Development
 27. Remainder of Lorain 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"?		4	0	5	9
Guidelines that encourage development affordable housing units?	1	3	0	5	9
Any potential barriers to the development of low- to moderate- income housing?	1	2	1	5	9
Guidelines that allow the development of mixed use housing?	1	3	0	5	9
Any potential barriers to the development of mixed use housing?	1	3	0	5	9
Occupancy Standards					
A definition for the term "family"?	1	2	1	5	9
Residential occupancy standards or limits?	1	3	0	5	9
Special Needs Housing					
A definition for the term "disability"?	1	3	0	5	9
Development standards for making housing accessible to persons with disabilities?	2	2	0	5	9
A process by which persons with disabilities can request modification to the jurisdiction's policies?	2	2	0	5	9
Standards for the development of senior housing?	1	3	0	5	9
Guidelines that distinguish senior citizen housing from other residential uses?	1	1	1	6	9
Guidelines for developing housing for any other special needs populations?	1	2	1	5	9
Fair Housing Policies					
A fair housing ordinance, policy, or regulation?	3	1	0	5	9
Policies or practices for "affirmatively furthering fair housing"?	2	2	0	5	9

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 Lorain 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

¹² For areas with both nonentitlement and entitlement communities, the results of the nonentitlement community government official survey and the entitlement community interviews were summed.

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 Remainder of Lorain 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 in the remainder of Lorain 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.

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 Lorain 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. 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 and appears to still existing in the remainder of Lorain 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. This is sometimes considered NIMBYism and appears to exist in the remainder of Lorain 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 27.H.1
Impediments Matrix
 27. Remainder of Lorain 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 ¹³		
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	Lack of inclusionary policies							X		X	All	M

¹³ 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.

28. MAHONING COUNTY

A. CENSUS BUREAU DATA

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

Table 28.A.1
Population by Age
28. Mahoning County
2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Under 5	15,332	6.0%	12,810	5.4%	-16.4%
5 to 19	52,549	20.4%	44,955	18.8%	-14.5%
20 to 24	14,810	5.8%	13,739	5.8%	-7.2%
25 to 34	29,626	11.5%	25,845	10.8%	-12.8%
35 to 54	75,604	29.4%	65,006	27.2%	-14.0%
55 to 64	23,905	9.3%	33,766	14.1%	41.3%
65 or Older	45,729	17.8%	42,702	17.9%	-6.6%
Total	257,555	100.0%	238,823	100.0%	-7.3%

Table 28.A.2
Elderly Population by Age
28. Mahoning County
2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
65 to 66	4,173	9.1%	4,377	10.3%	4.9%
67 to 69	6,591	14.4%	6,599	15.5%	.1%
70 to 74	11,986	26.2%	8,955	21.0%	-25.3%
75 to 79	10,611	23.2%	7,935	18.6%	-25.2%
80 to 84	7,146	15.6%	7,466	17.5%	4.5%
85 or Older	5,222	11.4%	7,370	17.3%	41.1%
Total	45,729	100.0%	42,702	100.0%	-6.6%

Table 28.A.3
Population by Race and Ethnicity
28. Mahoning County
2000 & 2010 Census SF1 Data

Race	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
White	208,727	81.0%	190,848	79.9%	-8.6%
Black	40,884	15.9%	37,433	15.7%	-8.4%
American Indian	445	.2%	491	.2%	10.3%
Asian	1,220	.5%	1,682	.7%	37.9%
Native Hawaiian/ Pacific Islander	62	.0%	51	.0%	-17.7%
Other	2,656	1.0%	3,418	1.4%	28.7%
Two or More Races	3,561	1.4%	4,900	2.1%	37.6%
Total	257,555	100.0%	238,823	100.0%	-7.3%
Non-Hispanic	249,915	97.0	227,687	95.3%	-8.9%
Hispanic	7,640	3.0%	11,136	4.7%	45.8%

Table 28.A.4
Disability by Age
 28. Mahoning County
 2010 Three-Year ACS Data

Age	Male		Female		Total	
	Disabled Population	Disability Rate	Disabled Population	Disability Rate	Disabled Population	Disability Rate
Under 5	94	1.4%	20	.3%	114	.9%
5 to 17	1,576	7.9%	1,518	7.9%	3,094	7.9%
18 to 34	1,911	8.7%	1,439	6.4%	3,350	7.6%
35 to 64	7,186	15.3%	7,316	14.6%	14,502	14.9%
65 to 74	1,865	21.5%	2,644	24.4%	4,509	23.1%
75 or Older	3,991	49.6%	5,945	44.7%	9,936	46.5%
Total	16,623	14.8%	18,882	15.4%	35,505	15.1%

Table 28.A.5
Employment Status by Disability and Type: Age 18 to 64
 28. Mahoning County
 2010 Three-Year ACS Data

Disability Status	Population
Employed:	97,242
With a disability:	6,311
With a hearing difficulty	1,570
With a vision difficulty	1,086
With a cognitive difficulty	1,921
With an ambulatory difficulty	2,521
With a self-care difficulty	737
With an independent living difficulty	1,423
No disability	90,931
Unemployed:	12,748
With a disability:	1,917
With a hearing difficulty	432
With a vision difficulty	332
With a cognitive difficulty	983
With an ambulatory difficulty	819
With a self-care difficulty	257
With an independent living difficulty	559
No disability	10,831
Not in labor force:	31,644
With a disability:	9,624
With a hearing difficulty	1,197
With a vision difficulty	1,097
With a cognitive difficulty	5,050
With an ambulatory difficulty	6,145
With a self-care difficulty	2,159
With an independent living difficulty	4,245
No disability	22,020
Total	141,634

Table 28.A.6**Households by Income**

28. Mahoning 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	20,366	19.8%	17,416	17.6%
\$15,000 to \$19,999	7,989	7.8%	7,124	7.2%
\$20,000 to \$24,999	8,194	8.0%	7,290	7.4%
\$25,000 to \$34,999	14,438	14.1%	12,510	12.6%
\$35,000 to \$49,999	17,204	16.8%	14,881	15.0%
\$50,000 to \$74,999	18,877	18.4%	18,441	18.6%
\$75,000 to \$99,999	8,297	8.1%	9,762	9.9%
\$100,000 or More	7,264	7.1%	11,600	11.7%
Total	102,629	100.0%	99,024	100.0%

Table 28.A.7**Poverty by Age**

28. Mahoning 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	4,300	13.7%	4,867	12.5%
6 to 17	7,300	23.3%	8,687	22.3%
18 to 64	15,941	50.9%	21,319	54.7%
65 or Older	3,787	12.1%	4,106	10.5%
Total	31,328	100.0%	38,979	100.0%
Poverty Rate	12.5%	.	16.6%	.

Table 28.A.8**Households by Year Home Built**

28. Mahoning 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	21,638	21.1%	19,860	20.1%
1940 to 1949	12,250	11.9%	9,190	9.3%
1950 to 1959	22,422	21.9%	20,718	20.9%
1960 to 1969	15,337	15.0%	13,639	13.8%
1970 to 1979	15,172	14.8%	13,878	14.0%
1980 to 1989	6,287	6.1%	6,817	6.9%
1990 to 1999	9,481	9.2%	9,290	9.4%
2000 to 2004	.	.	4,246	4.3%
2005 or Later	.	.	1,386	1.4%
Total	102,587	100.0%	99,024	100.0%

Table 28.A.9**Housing Units by Type**

28. Mahoning 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	87,765	78.5%	89,212	79.4%
Duplex	4,689	4.2%	4,625	4.1%
Tri- or Four-Plex	4,183	3.7%	4,122	3.7%
Apartment	13,145	11.8%	12,556	11.2%
Mobile Home	1,980	1.8%	1,802	1.6%
Boat, RV, Van, Etc.	0	.0%	0	.0%
Total	111,762	100.0%	112,317	100.0%

Table 28.A.10**Housing Units by Tenure**

28. Mahoning County

2000 & 2010 Census SF1 Data

Tenure	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
Occupied Housing Units	102,587	91.8%	98,712	88.3%	-3.8%
Owner-Occupied	74,654	72.8%	69,692	70.6%	-6.6%
Renter-Occupied	27,933	27.2%	29,020	29.4%	3.9%
Vacant Housing Units	9,175	8.2%	13,121	11.7%	43.0%
Total Housing Units	111,762	100.0%	111,833	100.0%	.1%

Table 28.A.11**Disposition of Vacant Housing Units**

28. Mahoning County

2000 & 2010 Census SF1 Data

Disposition	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
For Rent	2,998	32.7%	3,561	27.1%	18.8%
For Sale	1,416	15.4%	1,726	13.2%	21.9%
Rented or Sold, Not Occupied	2,572	28.0%	585	4.5%	-77.3%
For Seasonal, Recreational, or Occasional Use	621	6.8%	779	5.9%	25.4%
For Migrant Workers	2	0.0%	3	.0%	50.0%
Other Vacant	1,566	17.1%	6,467	49.3%	313.0%
Total	9,175	100.0%	13,121	100.0%	43.0%

Table 28.A.12
Households by Household Size
 28. Mahoning County
 2000 & 2010 Census SF1 Data

Size	2000 Census		2010 Census		% Change 00-10
	Households	% of Total	Households	% of Total	
One Person	29,881	29.1%	31,365	31.8%	5.0%
Two Persons	33,852	33.0%	33,341	33.8%	-1.5%
Three Persons	16,404	16.0%	15,123	15.3%	-7.8%
Four Persons	13,453	13.1%	11,191	11.3%	-16.8%
Five Persons	5,992	5.8%	5,004	5.1%	-16.5%
Six Persons	2,014	2.0%	1,756	1.8%	-12.8%
Seven Persons or More	991	1.0%	932	.9%	-6.0%
Total	102,587	100.0%	98,712	100.0%	-3.8%

Table 28.A.13
Household Type by Tenure
 28. Mahoning County
 2000 & 2010 Census SF1 Data

Household Type	2000 Census		2010 Census		% Change 00-10
	Households	% of Total	Households	% of Total	
Family Households	68,865	67.1%	62,676	63.5%	-9.0%
Married-Couple Family	50,285	73.0%	43,140	68.8%	-14.2%
Owner-Occupied	44,734	89.0%	38,284	88.7%	-14.4%
Renter-Occupied	5,551	11.0%	4,856	11.3%	-12.5%
Other Family	18,580	27.0%	19,536	31.2%	5.1%
Male Householder, No Spouse	4,104	22.1%	4,707	24.1%	14.7%
Owner-Occupied	2,868	69.9%	3,106	66.0%	8.3%
Renter-Occupied	1,236	30.1%	1,601	34.0%	29.5%
Female Householder, No Spouse	14,476	77.9%	14,829	75.9%	2.4%
Owner-Occupied	8,019	55.4%	7,464	50.3%	-6.9%
Renter-Occupied	6,457	44.6%	7,365	49.7%	14.1%
Non-Family Households	33,722	32.9%	36,036	36.5%	6.9%
Owner-Occupied	19,033	56.4%	20,838	57.8%	9.5%
Renter-Occupied	14,689	43.6%	15,198	42.2%	3.5%
Total	102,587	100.0%	98,712	100.0%	-3.8%

Table 28.A.14
Group Quarters Population
 28. Mahoning 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	2,499	47.0%	3,227	56.8%	29.1%
Juvenile Facilities	.	.	62	1.1%	.
Nursing Homes	2,508	47.1%	2,373	41.7%	-5.4%
Other Institutions	314	5.9%	24	.4%	-92.4%
Total	5,321	100.0%	5,686	100.0%	6.9%
Noninstitutionalized					
College Dormitories	856	44.4%	1,283	57.3%	49.9%
Military Quarters	0	.0%	0	.0%	%
Other Noninstitutional	1,070	55.6%	956	42.7%	-10.7%
Total	1,926	26.6%	2,239	28.3%	16.3%
Total Group Quarters Population	7,247	100.0%	7,925	100.0%	9.4%

Table 28.A.15
Overcrowding and Severe Overcrowding
 28. Mahoning 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	74,050	99.1%	482	.6%	158	.2%	74,690
2010 ACS	71,158	99.5%	372	.5%	18	.0%	71,548
Renter							
2000 Census	27,102	97.2%	536	1.9%	259	.9%	27,897
2010 ACS	27,116	98.7%	204	.7%	156	.6%	27,476
Total							
2000 Census	101,152	98.6%	1,018	1.0%	417	.4%	102,587
2010 ACS	98,274	99.2%	576	.6%	174	.2%	99,024

Table 28.A.16
Households with Incomplete Plumbing Facilities
 28. Mahoning County
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Plumbing Facilities	102,145	98,688
Lacking Complete Plumbing Facilities	442	336
Total Households	102,587	99,024
Percent Lacking	.4%	.3%

Table 28.A.17
Households with Incomplete Kitchen Facilities
 28. Mahoning County
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Kitchen Facilities	102,084	98,366
Lacking Complete Kitchen Facilities	503	658
Total Households	102,587	99,024
Percent Lacking	.5%	.7%

Table 28.A.18
Cost Burden and Severe Cost Burden by Tenure
 28. Mahoning 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	29,996	74.8%	6,459	16.1%	3,402	8.5%	240	.6%	40,097
2010 ACS	29,272	66.8%	9,056	20.7%	5,361	12.2%	122	.3%	43,811
Owner Without a Mortgage									
2000 Census	24,031	87.6%	1,921	7.0%	1,093	4.0%	375	1.4%	27,420
2010 ACS	23,304	84.0%	2,549	9.2%	1,689	6.1%	195	.7%	27,737
Renter									
2000 Census	14,933	54.2%	5,031	18.3%	4,756	17.3%	2,831	10.3%	27,551
2010 ACS	11,390	41.5%	6,224	22.7%	7,141	26.0%	2,721	9.9%	27,476
Total									
2000 Census	68,960	72.5%	13,411	14.1%	9,251	9.7%	3,446	3.6%	95,068
2010 ACS	63,966	64.6%	17,829	18.0%	14,191	14.3%	3,038	3.1%	99,024

Table 28.A.19
Median Housing Costs
 28. Mahoning County
 2000 Census SF3 & 2010 Five-Year ACS Data

Housing Cost	2000 Census	2010 ACS
Median Contract Rent	\$372	\$459
Median Home Value	\$79,700	\$98,400

B. BEA DATA

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

Table 28.B.1
Employment by Industry
 28. Mahoning County
 Select Years 2001–2010 BEA Data

NAICS Categories	2001	2005	2006	2007	2008	2009	2010	% Change 01–10
Farm employment	820	683	681	688	634	644	638	-22.2%
Forestry, fishing, related activities, and other	(D) ¹⁴	(D)	102	122	118	108	110	%
Mining	(D)	(D)	622	690	852	805	833	%
Utilities	755	446	408	412	414	398	367	-51.4%
Construction	8,459	8,313	8,193	8,015	7,644	6,805	6,484	-23.3%
Manufacturing	12,032	10,618	10,331	10,295	9,971	8,623	8,603	-28.5%
Wholesale trade	5,246	5,677	5,663	5,791	6,121	5,733	5,343	1.8%
Retail trade	19,254	17,821	17,761	17,719	16,794	16,172	15,329	-20.4%
Transportation and warehousing	3,844	4,886	4,949	5,066	5,175	4,380	4,575	19.0%
Information	2,392	2,314	2,340	2,419	2,291	2,074	1,532	-36.0%
Finance and insurance	4,959	4,933	4,871	5,038	5,168	5,426	5,551	11.9%
Real estate and rental and leasing	4,028	4,668	4,633	4,761	4,538	4,415	4,270	6.0%
Professional and technical services	5,252	5,229	5,571	5,838	5,577	5,477	5,432	3.4%
Management of companies and enterprises	805	939	920	925	1,083	943	922	14.5%
Administrative and waste services	9,410	8,795	9,404	9,738	9,126	8,865	10,366	10.2%
Educational services	1,930	2,163	2,073	2,090	2,116	2,204	2,229	15.5%
Health care and social assistance	19,150	18,860	18,722	18,964	19,167	19,632	19,429	1.5%
Arts, entertainment, and recreation	2,028	1,965	1,899	1,913	2,003	1,943	2,038	.5%
Accommodation and food services	9,852	10,477	10,214	10,235	9,754	9,649	9,865	.1%
Other services, except public administration	8,171	8,128	7,834	7,822	7,718	7,554	7,440	-8.9%
Government and government enterprises	16,992	17,092	17,291	17,170	17,315	17,614	16,840	-.9%
Total	136,038	134,626	134,482	135,711	133,579	129,464	128,196	-5.8%

¹⁴ (D): These data are not shown to avoid disclosure of confidential information, but estimates are included in the totals.

Table 28.B.2
Real Earnings by Industry

28. Mahoning County
 Select Years 2001–2010 BEA Data, Real 2011 Dollars

NAICS Categories	2001	2005	2006	2007	2008	2009	2010	% Change 00–10
Farm earnings	9,447	7,707	6,750	8,804	8,668	8,993	7,873	-16.7%
Forestry, fishing, related activities, and other	(D) ¹⁵	(D)	1,064	1,171	1,334	1,094	1,100	%
Mining	(D)	(D)	56,896	53,412	73,235	24,189	24,984	%
Utilities	64,859	43,282	38,522	38,078	44,111	41,885	37,736	-41.8%
Construction	393,557	406,838	405,819	387,197	353,771	316,854	308,988	-21.5%
Manufacturing	600,749	573,966	567,942	551,994	538,882	460,829	402,896	-32.9%
Wholesale trade	310,844	355,938	367,982	382,401	430,959	395,469	365,142	17.5%
Retail trade	644,837	599,993	564,308	541,840	498,277	486,615	480,041	-25.6%
Transportation and warehousing	182,759	238,092	240,567	234,074	230,741	183,246	199,721	9.3%
Information	107,536	114,156	110,029	121,183	111,967	103,350	71,213	-33.8%
Finance and insurance	223,057	245,390	245,172	234,754	216,587	209,519	212,418	-4.8%
Real estate and rental and leasing	126,061	98,355	83,259	64,661	77,050	87,442	76,230	-39.5%
Professional and technical services	223,477	238,792	247,894	262,909	295,512	272,656	288,756	29.2%
Management of companies and enterprises	45,445	52,582	50,914	52,777	52,232	57,817	53,372	17.4%
Administrative and waste services	215,243	241,656	267,058	271,692	260,645	263,009	311,771	44.8%
Educational services	35,008	45,266	43,169	44,260	45,311	47,533	47,514	35.7%
Health care and social assistance	858,663	869,265	838,868	838,380	870,785	898,336	880,344	2.5%
Arts, entertainment, and recreation	23,284	15,245	15,469	16,082	15,510	15,750	17,026	-26.9%
Accommodation and food services	159,854	165,176	159,708	166,855	158,722	159,734	167,617	4.9%
Other services, except public administration	267,195	263,058	250,819	237,256	210,314	199,737	203,428	-23.9%
Government and government enterprises	827,625	904,004	907,371	900,092	897,308	921,155	923,069	11.5%
Total	5,342,573	5,533,291	5,469,581	5,409,875	5,391,923	5,155,210	5,081,239	-4.9%

¹⁵ (D): These data are not shown to avoid disclosure of confidential information, but estimates are included in the totals.

Table 28.B.3
Real Earnings Per Job by Industry
 28. Mahoning 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	11,521	11,285	9,912	12,797	13,673	13,964	12,339	7.1%
Forestry, fishing, related activities, and other	(D) ¹⁶	(D)	10,432	9,596	11,307	10,130	10,000	%
Mining	(D)	(D)	91,473	77,409	85,957	30,048	29,993	%
Utilities	85,906	97,046	94,418	92,423	106,547	105,239	102,822	19.7%
Construction	46,525	48,940	49,532	48,309	46,281	46,562	47,654	2.4%
Manufacturing	49,929	54,056	54,975	53,618	54,045	53,442	46,832	-6.2%
Wholesale trade	59,254	62,698	64,980	66,034	70,407	68,981	68,340	15.3%
Retail trade	33,491	33,668	31,772	30,580	29,670	30,090	31,316	-6.5%
Transportation and warehousing	47,544	48,729	48,609	46,205	44,588	41,837	43,655	-8.2%
Information	44,957	49,333	47,021	50,096	48,873	49,831	46,484	3.4%
Finance and insurance	44,980	49,745	50,333	46,597	41,909	38,614	38,267	-14.9%
Real estate and rental and leasing	31,296	21,070	17,971	13,581	16,979	19,806	17,852	-43.0%
Professional and technical services	42,551	45,667	44,497	45,034	52,988	49,782	53,158	24.9%
Management of companies and enterprises	56,453	55,998	55,341	57,057	48,229	61,312	57,888	2.5%
Administrative and waste services	22,874	27,477	28,398	27,900	28,561	29,668	30,076	31.5%
Educational services	18,139	20,927	20,824	21,177	21,414	21,567	21,316	17.5%
Health care and social assistance	44,839	46,090	44,807	44,209	45,431	45,759	45,311	1.1%
Arts, entertainment, and recreation	11,481	7,758	8,146	8,407	7,743	8,106	8,354	-27.2%
Accommodation and food services	16,226	15,766	15,636	16,302	16,273	16,554	16,991	4.7%
Other services, except public administration	32,700	32,364	32,017	30,332	27,250	26,441	27,343	-16.4%
Government and government enterprises	48,707	52,890	52,477	52,422	51,823	52,297	54,814	12.5%
Average	39,272	41,101	40,671	39,864	40,365	39,820	39,636	.93%

¹⁶ (D): These data are not shown to avoid disclosure of confidential information, but estimates are included in the totals.

Table 28.B.4
Total Employment and Real Personal Income
 28. Mahoning 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	4,844,711	337,107	-70,383	572,517	455,391	5,465,129	18,118	128,924	37,579
1970	4,742,251	325,681	-130,143	598,613	510,772	5,395,812	17,690	129,122	36,727
1971	4,528,882	318,444	-83,280	616,379	573,428	5,316,965	17,359	124,265	36,447
1972	4,742,651	348,069	-62,628	631,287	602,433	5,565,673	18,320	126,347	37,538
1973	5,083,263	430,950	-18,711	666,713	657,466	5,957,782	19,690	131,271	38,723
1974	5,214,288	456,414	-97,677	707,692	713,871	6,081,760	19,858	133,379	39,095
1975	4,822,289	412,495	-96,811	697,367	840,159	5,850,509	20,211	127,115	37,935
1976	4,994,108	430,902	-52,820	715,548	871,481	6,097,414	20,487	127,556	39,151
1977	5,227,591	452,814	1,149	759,437	903,345	6,438,709	21,674	131,217	39,838
1978	5,128,479	457,422	143,858	797,076	949,605	6,561,596	22,423	130,309	39,356
1979	5,126,809	475,869	216,079	859,577	982,227	6,708,824	23,209	130,744	39,212
1980	4,704,362	433,180	264,525	989,173	1,097,747	6,622,627	22,940	125,497	37,485
1981	4,447,338	438,816	299,521	1,111,866	1,122,265	6,542,175	22,967	121,655	36,557
1982	4,065,948	405,411	130,114	1,138,820	1,259,644	6,189,115	21,855	116,475	34,908
1983	3,833,475	385,858	259,954	1,220,064	1,264,365	6,192,000	22,044	111,892	34,261
1984	3,978,989	412,653	293,705	1,315,569	1,222,327	6,397,937	23,104	115,274	34,518
1985	4,013,816	424,710	268,341	1,367,123	1,252,355	6,476,925	23,593	116,883	34,341
1986	4,057,640	443,409	193,448	1,406,185	1,307,477	6,521,341	24,034	119,401	33,983
1987	4,146,133	452,739	150,376	1,322,715	1,334,648	6,501,133	24,215	121,733	34,060
1988	4,423,353	491,399	140,738	1,344,004	1,339,043	6,755,740	25,391	125,255	35,316
1989	4,517,209	518,014	138,242	1,441,860	1,368,430	6,947,726	26,144	128,588	35,129
1990	4,588,242	533,824	54,811	1,398,424	1,481,838	6,989,491	26,366	130,817	35,074
1991	4,532,295	537,372	112,075	1,382,603	1,516,937	7,006,537	26,410	130,766	34,659
1992	4,539,658	538,594	336,346	1,369,485	1,594,868	7,301,764	27,401	127,779	35,528
1993	4,620,891	554,344	366,922	1,338,821	1,599,812	7,372,102	27,634	128,267	36,025
1994	4,734,970	577,333	531,871	1,379,733	1,607,046	7,676,287	28,872	131,008	36,143
1995	4,790,229	588,882	446,014	1,445,259	1,651,219	7,743,839	29,244	133,651	35,841
1996	4,841,290	592,029	225,295	1,438,650	1,649,587	7,562,792	28,680	134,981	35,867
1997	4,984,444	596,246	243,742	1,546,229	1,651,095	7,829,264	29,865	136,789	36,439
1998	5,212,263	603,302	192,874	1,609,997	1,643,799	8,055,631	30,887	140,943	36,982
1999	5,343,086	612,789	199,590	1,545,116	1,651,176	8,126,179	31,358	141,331	37,805
2000	5,327,929	589,830	227,121	1,579,521	1,694,577	8,239,317	32,047	140,325	37,968
2001	5,342,573	582,676	219,003	1,495,757	1,780,889	8,255,546	32,341	136,038	39,272
2002	5,450,937	577,424	222,416	1,385,729	1,836,669	8,318,328	32,879	133,422	40,855
2003	5,532,772	591,241	266,048	1,354,880	1,869,877	8,432,335	33,502	133,697	41,382
2004	5,534,536	598,688	202,075	1,241,780	1,884,861	8,264,565	33,081	133,295	41,521
2005	5,533,291	604,521	143,260	1,236,918	1,905,528	8,214,476	33,163	134,626	41,101
2006	5,469,581	604,530	162,674	1,369,713	1,923,407	8,320,844	33,809	134,482	40,671
2007	5,409,875	604,804	125,088	1,501,481	1,963,687	8,395,326	34,484	135,711	39,864
2008	5,391,923	617,102	49,644	1,576,279	2,068,633	8,469,377	35,059	133,579	40,365
2009	5,155,210	606,971	-111,275	1,228,722	2,295,288	7,960,975	33,164	129,464	39,820
2010	5,081,239	600,163	-41,179	1,236,776	2,342,286	8,018,959	33,649	128,196	39,636

C. BLS DATA

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

Table 28.C.1
Labor Force Statistics
 28. Mahoning County
 1990–2011 BLS Data

Year	Labor Force	Employment	Unemployment	Unemployment Rate	Statewide Unemployment Rate
1990	118,105	109,651	8,454	7.2%	5.7%
1991	117,389	109,184	8,205	7.0%	6.6%
1992	119,950	108,800	11,150	9.3%	7.4%
1993	119,064	108,856	10,208	8.6%	6.7%
1994	120,255	110,409	9,846	8.2%	5.6%
1995	120,135	112,311	7,824	6.5%	4.9%
1996	119,391	111,307	8,084	6.8%	5.0%
1997	119,636	112,126	7,510	6.3%	4.6%
1998	118,599	111,054	7,545	6.4%	4.3%
1999	116,686	110,124	6,562	5.6%	4.3%
2000	120,302	114,173	6,129	5.1%	4.0%
2001	118,322	111,518	6,804	5.8%	4.4%
2002	118,073	109,749	8,324	7.0%	5.7%
2003	118,062	109,290	8,772	7.4%	6.2%
2004	119,246	110,399	8,847	7.4%	6.1%
2005	119,363	111,219	8,144	6.8%	5.9%
2006	119,301	111,777	7,524	6.3%	5.4%
2007	115,889	108,701	7,188	6.2%	5.6%
2008	115,012	106,845	8,167	7.1%	6.5%
2009	115,523	101,361	14,162	12.3%	10.1%
2010	114,525	101,546	12,979	11.3%	10.0%
2011	112,938	102,106	10,832	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.¹⁷ The information presented in this section presents detailed HMDA data, including denial rates and predatory lending including high annual percentage rate (APR) loans.

Table 28.D.1
Purpose of Loan by Year
28. Mahoning County
2004–2011 HMDA Data

Purpose	2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	6,500	7,262	6,969	4,668	3,080	2,832	2,443	2,455	36,209
Home Improvement	2,068	2,319	2,013	1,954	1,307	807	695	537	11,700
Refinancing	13,854	13,329	11,637	8,239	5,741	6,862	6,099	5,222	70,983
Total	22,422	22,910	20,619	14,861	10,128	10,501	9,237	8,214	118,892

Table 28.D.2
Occupancy Status for Home Purchase Loan Applications
28. Mahoning County
2004–2011 HMDA Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	Total
Owner-Occupied	5,710	6,425	6,192	4,147	2,742	2,657	2,298	2,294	32,465
Not Owner-Occupied	713	772	730	479	334	173	141	159	3,501
Not Applicable	77	65	47	42	4	2	4	2	243
Total	6,500	7,262	6,969	4,668	3,080	2,832	2,443	2,455	36,209

Table 28.D.3
Owner-Occupied Home Purchase Loan Applications by Loan Type
28. Mahoning County
2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Conventional	5,015	5,897	5,781	3,686	1,666	1,230	1,135	1,075	25,485
FHA - Insured	558	408	336	385	933	1,233	1,019	1,045	5,917
VA - Guaranteed	128	110	71	67	120	126	112	121	855
Rural Housing Service or Farm Service Agency	9	10	4	9	23	68	32	53	208
Total	5,710	6,425	6,192	4,147	2,742	2,657	2,298	2,294	32,465

¹⁷ 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 28.D.4
Loan Applications by Action Taken
 28. Mahoning County
 2004–2011 HMDA Data

Action	2004	2005	2006	2007	2008	2009	2010	2011	Total
Loan Originated	3,375	3,587	3,268	2,433	1,647	1,486	1,333	1,267	18,396
Application Approved but not Accepted	469	524	414	251	132	75	76	73	2,014
Application Denied	635	797	932	550	314	241	243	243	3,955
Application Withdrawn by Applicant	412	589	386	178	96	94	82	85	1,922
File Closed for Incompleteness	61	62	80	53	25	19	13	17	330
Loan Purchased by the Institution	758	859	1,112	681	528	742	551	609	5,840
Preapproval Request Denied	0	7	0	1	0	0	0	0	8
Preapproval Approved but not Accepted	0	0	0	0	0	0	0	0	0
Total	5,710	6,425	6,192	4,147	2,742	2,657	2,298	2,294	32,465
Denial Rate	15.8%	18.2%	22.2%	18.4%	16.0%	14.0%	15.4%	16.1%	17.7%

Table 28.D.5
Denial Rates by Gender of Applicant
 28. Mahoning County
 2004–2011 HMDA Data

Year	Male	Female	Not Available	Not Applicable	Average
2004	13.2%	17.9%	54.8%	.0%	15.8%
2005	15.8%	21.9%	32.2%	100.0%	18.2%
2006	19.2%	27.3%	29.7%	.0%	22.2%
2007	15.4%	22.6%	34.4%	%	18.4%
2008	14.4%	18.5%	22.2%	.0%	16.0%
2009	13.4%	13.8%	23.6%	.0%	14.0%
2010	14.3%	16.3%	24.7%	%	15.4%
2011	14.3%	18.5%	22.3%	%	16.1%
Average	15.4%	20.8%	31.6%	20.0%	17.7%

Table 28.D.6
Loan Applications by Selected Action Taken by Gender of Applicant
 28. Mahoning County
 2004–2011 HMDA Data

Gender		2004	2005	2006	2007	2008	2009	2010	2011	Total
Male	Originated	2,362	2,451	2,186	1,618	1,091	941	884	833	12,366
	Denied	358	459	519	294	184	146	147	139	2,246
	Denial Rate	13.2%	15.8%	19.2%	15.4%	14.4%	13.4%	14.3%	14.3%	15.4%
Female	Originated	955	1,037	946	735	492	489	385	347	5,386
	Denied	208	290	356	214	112	78	75	79	1,412
	Denial Rate	17.9%	21.9%	27.3%	22.6%	18.5%	13.8%	16.3%	18.5%	20.8%
Not Available	Originated	57	99	135	80	63	55	64	87	640
	Denied	69	47	57	42	18	17	21	25	296
	Denial Rate	54.8%	32.2%	29.7%	34.4%	22.2%	23.6%	24.7%	22.3%	31.6%
Not Applicable	Originated	1	0	1	0	1	1	0	0	4
	Denied	0	1	0	0	0	0	0	0	1
	Denial Rate	.0%	100.0%	.0%	%	.0%	.0%	%	%	20.0%
Total	Originated	3,375	3,587	3,268	2,433	1,647	1,486	1,333	1,267	18,396
	Denied	635	797	932	550	314	241	243	243	3,955
	Denial Rate	15.8%	18.2%	22.2%	18.4%	16.0%	14.0%	15.4%	16.1%	17.7%

Table 28.D.7
Denial Rates by Race/Ethnicity of Applicant
 28. Mahoning County
 2004–2011 HMDA Data

Race/Ethnicity	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	60.0%	60.0%	20.0%	33.3%	.0%	14.3%	.0%	.0%	28.9%
Asian	18.2%	13.8%	18.8%	28.6%	33.3%	13.0%	16.7%	38.5%	20.7%
Black	35.9%	29.9%	39.5%	35.0%	33.9%	27.7%	20.8%	31.7%	33.9%
White	11.5%	15.4%	18.9%	15.1%	14.0%	12.4%	13.8%	14.2%	14.7%
Not Available	41.3%	32.2%	36.0%	37.1%	26.5%	29.1%	29.5%	24.8%	33.7%
Not Applicable	50.0%	100.0%	.0%	%	.0%	0.0%	0%	%	40.0%
Average	15.8%	18.2%	22.2%	18.4%	16.0%	14.0%	15.4%	16.1%	17.7%
Non-Hispanic	13.7%	16.6%	20.9%	16.6%	15.1%	12.9%	13.7%	14.5%	16.1%
Hispanic	23.3%	29.7%	28.4%	29.7%	23.0%	15.0%	22.0%	39.4%	26.8%

Table 28.D.8
Loan Applications by Selected Action Taken by Race/Ethnicity of Applicant
 28. Mahoning County
 2004–2011 HMDA Data

Race		2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Originated	4	2	4	4	4	6	4	4	32
	Denied	6	3	1	2	0	1	0	0	13
	Denial Rate	60.0%	60.0%	20.0%	33.3%	.0%	.0%	.0%	.0%	28.9%
Asian	Originated	27	25	26	20	6	20	10	8	142
	Denied	6	4	6	8	3	3	2	5	37
	Denial Rate	18.2%	13.8%	18.8%	28.6%	33.3%	13.0%	16.7%	38.5%	20.7%
Black	Originated	198	281	245	169	80	47	61	43	1,124
	Denied	111	120	160	91	41	18	16	20	577
	Denial Rate	35.9%	29.9%	39.5%	35.0%	33.9%	27.7%	20.8%	31.7%	33.9%
White	Originated	2,968	3,039	2,780	2,116	1,473	1,339	1,167	1,106	15,988
	Denied	386	555	646	376	240	189	187	183	2,762
	Denial Rate	11.5%	15.4%	18.9%	15.1%	14.0%	12.4%	13.8%	14.2%	14.7%
Not Available	Originated	175	240	212	124	83	73	91	106	1,104
	Denied	123	114	119	73	30	30	38	35	562
	Denial Rate	41.3%	32.2%	36.0%	37.1%	26.5%	29.1%	29.5%	24.8%	33.7%
Not Applicable	Originated	3	0	1	0	1	1	0	0	6
	Denied	3	1	0	0	0	0	0	0	4
	Denial Rate	41.3%	32.2%	36.0%	37.1%	26.5%	29.1%	29.5%	24.8%	40.0%
Total	Originated	3,375	3,587	3,268	2,433	1,647	1,486	1,333	1,267	18,396
	Denied	635	797	932	550	314	241	243	243	3,955
	Denial Rate	15.8%	18.2%	22.2%	18.4%	16.0%	14.0%	15.4%	16.1%	17.7%
Non-Hispanic	Originated	2,871	3,256	2,979	2,250	1,523	1,375	1,215	1,146	16,615
	Denied	454	649	788	447	271	203	193	194	3,199
	Denial Rate	13.7%	16.6%	20.9%	16.6%	15.1%	12.9%	13.7%	14.5%	16.1%
Hispanic	Originated	69	83	83	64	47	34	32	20	432
	Denied	21	35	33	27	14	6	9	13	158
	Denial Rate	23.3%	29.7%	28.4%	29.7%	23.0%	15.0%	22.0%	39.4%	26.8%

Table 28.D.9
Loan Applications by Reason for Denial
 28. Mahoning County
 2004–2011 HMDA Data

Denial Reason	2004	2005	2006	2007	2008	2009	2010	2011	Total
Debt-to-Income Ratio	63	61	101	61	36	50	53	56	481
Employment History	12	16	12	11	5	6	6	11	79
Credit History	145	134	148	103	88	60	69	59	806
Collateral	55	48	70	38	46	42	41	27	367
Insufficient Cash	9	13	9	14	10	2	10	6	73
Unverifiable Information	17	27	29	40	12	3	6	3	137
Credit Application Incomplete	39	41	59	61	45	29	23	43	340
Mortgage Insurance Denied	1	0	2	1	2	1	3	0	10
Other	146	268	180	49	18	18	15	10	704
Missing	148	189	322	172	52	30	17	28	958
Total	635	797	932	550	314	241	243	243	3,955

Table 28.D.10
Denial Rates by Income of Applicant
 28. Mahoning County
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	36.4%	39.0%	40.6%	44.9%	35.0%	40.4%	53.7%	59.4%	42.2%
\$15,001–\$30,000	23.4%	25.3%	32.9%	29.9%	22.8%	19.3%	16.2%	20.9%	25.6%
\$30,001–\$45,000	16.8%	18.4%	22.9%	19.5%	15.4%	12.6%	13.3%	17.4%	18.1%
\$45,001–\$60,000	12.2%	15.9%	22.8%	14.0%	19.2%	11.6%	15.9%	13.9%	16.0%
\$60,001–\$75,000	11.1%	15.9%	11.2%	11.3%	12.6%	11.6%	14.4%	15.3%	12.8%
Above \$75,000	7.8%	10.5%	12.5%	9.3%	8.5%	10.1%	9.9%	8.9%	9.8%
Data Missing	26.0%	24.7%	20.0%	30.6%	11.8%	17.4%	30.6%	40.0%	24.9%
Total	15.8%	18.2%	22.2%	18.4%	16.0%	14.0%	15.4%	16.1%	17.7%

Table 28.D.11
Denial Rates of Loans by Race/Ethnicity and Income of Applicant
 28. Mahoning County
 2004–2011 HMDA Data

Race	<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	Above \$75K	Data Missing	Average
American Indian	50.0%	27.3%	50.0%	.0%	66.7%	9.1%	%	28.9%
Asian	100.0%	36.1%	32.4%	14.3%	9.1%	11.3%	.0%	20.7%
Black	45.8%	38.6%	29.9%	28.7%	35.0%	25.4%	53.8%	33.9%
White	40.7%	21.5%	15.1%	13.9%	10.4%	8.5%	19.8%	14.7%
Not Available	44.1%	43.6%	38.0%	29.6%	26.4%	19.2%	55.0%	33.7%
Not Applicable	100.0%	100.0%	.0%	50.0%	100.0%	.0%	.0%	40.0%
Average	42.2%	25.6%	18.1%	16.0%	12.8%	9.8%	24.9%	17.7%
Non-Hispanic Ethnicity	41.1%	23.9%	16.2%	14.9%	12.0%	9.1%	20.0%	16.1%
Hispanic (Ethnicity)	42.9%	33.7%	26.5%	23.4%	8.5%	8.2%	26.3%	26.8%

Table 28.D.12
Loan Applications by Reason for Denial by Race/Ethnicity of Applicant
 28. Mahoning County
 2004–2011 HMDA Data

Denial Reason	American Indian	Asian	Black	White	Not Available	Not Applicable	Total	Hispanic (Ethnicity)
Debt-to-Income Ratio	1	7	44	378	50	1	481	30
Employment History	0	1	8	60	10	0	79	5
Credit History	4	7	149	543	103	0	806	38
Collateral	0	3	38	288	37	1	367	14
Insufficient Cash	0	0	8	53	12	0	73	2
Unverifiable Information	0	1	27	92	17	0	137	7
Credit Application Incomplete	1	7	36	250	44	2	340	7
Mortgage Insurance Denied	0	0	0	10	0	0	10	1
Other	3	2	131	473	95	0	704	27
Missing	4	9	136	615	194	0	958	27
Total	13	37	577	2,762	562	4	3,955	158
% Missing	30.8%	24.3%	23.6%	22.3%	34.5%	.0%	24.2%	17.1%

Table 28.D.13
Loan Applications by Income of Applicant: Originated and Denied
 28. Mahoning County
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Loan Originated	68	47	60	43	26	28	25	13	310
	Application Denied	39	30	41	35	14	19	29	19	226
	Denial Rate	36.4%	39.0%	40.6%	44.9%	35.0%	40.4%	53.7%	59.4%	42.2%
\$15,001–\$30,000	Loan Originated	640	701	615	423	277	285	232	197	3,370
	Application Denied	196	238	301	180	82	68	45	52	1,162
	Denial Rate	23.4%	25.3%	32.9%	29.9%	22.8%	19.3%	16.2%	20.9%	25.6%
\$30,001–\$45,000	Loan Originated	815	893	836	615	435	366	294	284	4,538
	Application Denied	165	202	248	149	79	53	45	60	1,001
	Denial Rate	16.8%	18.4%	22.9%	19.5%	15.4%	12.6%	13.3%	17.4%	18.1%
\$45,001–\$60,000	Loan Originated	679	736	587	486	303	274	259	260	3,584
	Application Denied	94	139	173	79	72	36	49	42	684
	Denial Rate	12.2%	15.9%	22.8%	14.0%	19.2%	11.6%	15.9%	13.9%	16.0%
\$60,001–\$75,000	Loan Originated	410	430	387	283	201	176	154	155	2,196
	Application Denied	51	81	49	36	29	23	26	28	323
	Denial Rate	11.1%	15.9%	11.2%	11.3%	12.6%	11.6%	14.4%	15.3%	12.8%
Above \$75,000	Loan Originated	666	707	703	549	390	338	344	346	4,043
	Application Denied	56	83	100	56	36	38	38	34	441
	Denial Rate	7.8%	10.5%	12.5%	9.3%	8.5%	10.1%	9.9%	8.9%	9.8%
Data Missing	Loan Originated	97	73	80	34	15	19	25	12	355
	Application Denied	34	24	20	15	2	4	11	8	118
	Denial Rate	26.0%	24.7%	20.0%	30.6%	11.8%	17.4%	30.6%	40.0%	24.9%
Total	Loan Originated	3,375	3,587	3,268	2,433	1,647	1,486	1,333	1,267	18,396
	Application Denied	635	797	932	550	314	241	243	243	3,955
	Denial Rate	15.8%	18.2%	22.2%	18.4%	16.0%	14.0%	15.4%	16.1%	17.7%

Table 28.D.14
Loan Applications by Income and Race/Ethnicity of Applicant: Originated and Denied
 28. Mahoning County
 2004–2011 HMDA Data

Race		<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	> \$75K	Data Missing	Total
American Indian	Loan Originated	1	8	6	6	1	10	0	32
	Application Denied	1	3	6	0	2	1	0	13
	Denial Rate	50.0%	27.3%	50.0%	.0%	66.7%	9.1%	%	28.9%
Asian	Loan Originated	0	23	23	24	20	47	5	142
	Application Denied	1	13	11	4	2	6	0	37
	Denial Rate	100.0%	36.1%	32.4%	14.3%	9.1%	11.3%	.0%	20.7%
Black	Loan Originated	45	385	295	201	89	103	6	1,124
	Application Denied	38	242	126	81	48	35	7	577
	Denial Rate	45.8%	38.6%	29.9%	28.7%	35.0%	25.4%	53.8%	33.9%
White	Loan Originated	226	2,761	3,964	3,126	1,966	3,629	316	15,988
	Application Denied	155	754	706	503	227	339	78	2,762
	Denial Rate	40.7%	21.5%	15.1%	13.9%	10.4%	8.5%	19.8%	14.7%
Not Available	Loan Originated	38	193	248	226	120	252	27	1,104
	Application Denied	30	149	152	95	43	60	33	562
	Denial Rate	44.1%	43.6%	38.0%	29.6%	26.4%	19.2%	55.0%	33.7%
Not Applicable	Loan Originated	0	0	2	1	0	2	1	6
	Application Denied	1	1	0	1	1	0	0	4
	Denial Rate	100.0%	100.0%	.0%	50.0%	100.0%	.0%	.0%	40.0%
Total	Loan Originated	310	3,370	4,538	3,584	2,196	4,043	355	18,396
	Application Denied	226	1,162	1,001	684	323	441	118	3,955
	Denial Rate	42.2%	25.6%	18.1%	16.0%	12.8%	9.8%	24.9%	17.7%
Non-Hispanic Ethnicity	Loan Originated	249	2,997	4,124	3,253	1,991	3,693	308	16,615
	Application Denied	174	939	798	571	271	369	77	3,199
	Denial Rate	41.1%	23.9%	16.2%	14.9%	12.0%	9.1%	20.0%	16.1%
Hispanic (Ethnicity)	Loan Originated	24	136	111	59	43	45	14	432
	Application Denied	18	69	40	18	4	4	5	158
	Denial Rate	42.9%	33.7%	26.5%	23.4%	8.5%	8.2%	26.3%	26.8%

PREDATORY LENDING

Table 28.D.15
Originated Owner-Occupied Loans by HAL Status
 28. Mahoning County
 2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Other	2,759	2,524	2,298	2,020	1,410	1,371	1,328	1,264	14,974
HAL	616	1,063	970	413	237	115	5	3	3,422
Total	3,375	3,587	3,268	2,433	1,647	1,486	1,333	1,267	18,396
Percent HAL	18.3%	29.6%	29.7%	17.0%	14.4%	7.7%	.4%	.2%	18.6%

Table 28.D.16
Loans by Loan Purpose by HAL Status
 28. Mahoning County
 2004–2011 HMDA Data

Loan Purpose	2004	2005	2006	2007	2008	2009	2010	2011	Total
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Home Purchase	Other	2,759	2,524	2,298	2,020	1,410	1,371	1,328	1,264	14,974
	HAL	616	1,063	970	413	237	115	5	3	3,422
	Percent HAL	18.3%	29.6%	29.7%	17.0%	14.4%	7.7%	.4%	.2%	18.6%
Home Improvement	Other	478	493	543	585	368	282	274	246	3,269
	HAL	156	199	170	137	89	58	16	8	833
	Percent HAL	24.6%	28.8%	23.8%	19.0%	19.5%	17.1%	5.5%	3.1%	20.3%
Refinancing	Other	3,422	2,486	2,158	1,750	1,488	2,848	2,830	2,358	19,340
	HAL	1,050	1,335	1,183	602	395	269	17	18	4,869
	Percent HAL	23.5%	34.9%	35.4%	25.6%	21.0%	8.6%	.6%	.8%	20.1%
Total	Other	6,659	5,503	4,999	4,355	3,266	4,501	4,432	3,868	37,583
	HAL	1,822	2,597	2,323	1,152	237	115	5	3	9,124
	Percent HAL	21.5%	32.1%	31.7%	20.9%	18.1%	8.9%	.9%	.7%	19.5%

Table 28.D.17
HALs Originated by Race of Borrower
 28. Mahoning County
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	0	1	2	1	1	1	0	0	6
Asian	4	11	5	1	1	0	0	0	22
Black	83	178	169	75	15	5	0	0	525
White	446	745	703	305	204	102	5	3	2,513
Not Available	82	128	91	31	16	6	0	0	354
Not Applicable	1	0	0	0	0	1	0	0	2
Total	616	1,063	970	413	237	115	5	3	3,422
Hispanic (Ethnicity)	13	32	33	14	11	6	0	0	109

Table 28.D.18
Rate of HALs Originated by Race/Ethnicity of Borrower
 28. Mahoning County
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	.0%	50.0%	50.0%	25.0%	25.0%	16.7%	.0%	.0%	18.8%
Asian	14.8%	44.0%	19.2%	5.0%	16.7%	.0%	.0%	.0%	15.5%
Black	41.9%	63.3%	69.0%	44.4%	18.8%	10.6%	.0%	.0%	46.7%
White	15.0%	24.5%	25.3%	14.4%	13.8%	7.6%	.4%	.3%	15.7%
Not Available	46.9%	53.3%	42.9%	25.0%	19.3%	8.2%	.0%	.0%	32.1%
Not Applicable	33.3%	%	.0%	%	.0%	100.0%	%	%	33%
Average	18.3%	29.6%	29.7%	17.0%	14.4%	7.7%	0.4%	0.2%	18.6%
Non-Hispanic Ethnicity	17.1%	27.8%	28.6%	16.4%	13.9%	7.6%	.4%	.3%	17.7%
Hispanic (Ethnicity)	18.8%	38.6%	39.8%	21.9%	23.4%	17.6%	.0%	.0%	25.2%

Table 28.D.19
Loans by HAL Status by Race/Ethnicity of Borrower
 28. Mahoning County
 2004–2011 HMDA Data

Race	Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Other	4	1	2	3	3	5	4	4	26
	HAL	0	1	2	1	1	1	0	0	6
	Percent HAL	.0%	50.0%	50.0%	25.0%	25.0%	16.7%	.0%	.0%	18.8%
Asian	Other	23	14	21	19	5	20	10	8	120
	HAL	4	11	5	1	1	0	0	0	22
	Percent HAL	14.8%	44.0%	19.2%	5.0%	16.7%	.0%	.0%	.0%	15.5%
Black	Other	115	103	76	94	65	42	61	43	599
	HAL	83	178	169	75	15	5	0	0	525
	Percent HAL	41.9%	63.3%	69.0%	44.4%	18.8%	10.6%	.0%	.0%	46.7%
White	Other	2,522	2,294	2,077	1,811	1,269	1,237	1,162	1,103	13,475
	HAL	446	745	703	305	204	102	5	3	2,513
	Percent HAL	15.0%	24.5%	25.3%	14.4%	13.8%	7.6%	0.4%	0.3%	15.7%
Not Available	Other	93	112	121	93	67	67	91	106	750
	HAL	82	128	91	31	16	6	0	0	354
	Percent HAL	46.9%	53.3%	42.9%	25.0%	19.3%	8.2%	.0%	.0%	32.1%
Not Applicable	Other	2	0	1	0	1	0	0	0	4
	HAL	1	0	0	0	0	1	0	0	2
	Percent HAL	33.3%	%	.0%	%	.0%	100.0%	%	%	33.0%
Total	Other	2,759	2,524	2,298	2,020	1,410	1,371	1,328	1,264	14,974
	HAL	616	1,063	970	413	237	115	5	3	3,422
	Percent HAL	18.3%	29.6%	29.7%	17.0%	14.4%	7.7%	.4%	.2%	18.6%
Non-Hispanic Ethnicity	Other	2,379	2,350	2,128	1,880	1,311	1,271	1,210	1,143	13,672
	HAL	492	906	851	370	212	104	5	3	2,943
	Percent HAL	17.1%	27.8%	28.6%	16.4%	13.9%	7.6%	.4%	.3%	17.7%
Hispanic (Ethnicity)	Other	56	51	50	50	36	28	32	20	323
	HAL	13	32	33	14	11	6	0	0	109
	Percent HAL	18.8%	38.6%	39.8%	21.9%	23.4%	17.6%	.0%	.0%	25.2%

Table 28.D.20
Rates of HALs by Income of Borrower
 28. Mahoning County
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Average
\$15,000 or Below	29.4%	46.8%	41.7%	41.9%	34.6%	10.7%	.0%	.0%	31.3%
\$15,001–\$30,000	29.2%	47.4%	49.4%	27.2%	20.9%	11.2%	1.3%	.5%	30.6%
\$30,001–\$45,000	21.2%	34.4%	32.4%	20.0%	19.3%	9.6%	.3%	.0%	21.9%
\$45,001–\$60,000	19.3%	27.4%	27.6%	13.6%	13.9%	6.6%	.4%	.0%	17.4%
\$60,001–\$75,000	10.5%	20.0%	21.2%	12.4%	9.5%	6.3%	.0%	.0%	12.6%
Above \$75,000	7.4%	13.4%	14.2%	8.4%	6.4%	4.7%	0.0%	.6%	8.2%
Data Missing	13.4%	26.0%	32.5%	29.4%	.0%	.0%	.0%	.0%	19.2%
Average	18.3%	29.6%	29.7%	17.0%	14.4%	7.7%	.4%	.2%	18.6%

Table 28.D.21
Loans by HAL Status by Income of Borrower
 28. Mahoning County
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Other	48	25	35	25	17	25	25	13	213
	HAL	20	22	25	18	9	3	0	0	97
	Percent HAL	29.4%	46.8%	41.7%	41.9%	34.6%	10.7%	.0%	.0%	31.3%
\$15,001–\$30,000	Other	453	369	311	308	219	253	229	196	2,338
	HAL	187	332	304	115	58	32	3	1	1,032
	Percent HAL	29.2%	47.4%	49.4%	27.2%	20.9%	11.2%	1.3%	.5%	30.6%
\$30,001–\$45,000	Other	642	586	565	492	351	331	293	284	3,544
	HAL	173	307	271	123	84	35	1	0	994
	Percent HAL	21.2%	34.4%	32.4%	20.0%	19.3%	9.6%	.3%	.0%	21.9%
\$45,001–\$60,000	Other	548	534	425	420	261	256	258	260	2,962
	HAL	131	202	162	66	42	18	1	0	622
	Percent HAL	19.3%	27.4%	27.6%	13.6%	13.9%	6.6%	.4%	.0%	17.4%
\$60,001–\$75,000	Other	367	344	305	248	182	165	154	155	1,920
	HAL	43	86	82	35	19	11	0	0	276
	Percent HAL	10.5%	20.0%	21.2%	12.4%	9.5%	6.3%	.0%	.0%	12.6%
Above \$75,000	Other	617	612	603	503	365	322	344	344	3,710
	HAL	49	95	100	46	25	16	0	2	333
	Percent HAL	7.4%	13.4%	14.2%	8.4%	6.4%	4.7%	.0%	.6%	8.2%
Data Missing	Other	84	54	54	24	15	19	25	12	287
	HAL	13	19	26	10	0	0	0	0	68
	Percent HAL	13.4%	26.0%	32.5%	29.4%	.0%	.0%	.0%	.0%	19.2%
Total	Other	2,759	2,524	2,298	2,020	1,410	1,371	1,328	1,264	14,974
	HAL	616	1,063	970	413	237	115	5	3	3,422
	Percent HAL	18.3%	29.6%	29.7%	17.0%	14.4%	7.7%	.4%	.2%	18.6%

E. CRA DATA

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

Table 28.E.1
Small Business Loans Originated: \$100,000 or Less by Tract MFI
 28. Mahoning 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	415	436	1,556	1,637		4,044
2001	427	426	1,694	1,705		4,252
2002	424	460	1,997	1,883		4,764
2003	222	905	2,249	2,199		5,575
2004	200	846	2,283	2,015		5,344
2005	163	683	2,400	2,073		5,319
2006	241	888	2,913	2,782		6,824
2007	240	956	3,198	3,025		7,419
2008	172	671	2,249	2,305		5,397
2009	81	256	885	1,029		2,251
2010	86	258	882	1,001		2,227
2011	105	311	1,129	1,193		2,738
Total	2,776	7,096	23,435	22,847	0	56,154
Loan Amount (\$1,000s)						
2000	5,289	5,237	22,108	22,939		55,573
2001	4,417	4,762	19,544	22,031		50,754
2002	5,372	4,658	21,254	23,019		54,303
2003	2,733	8,869	21,728	21,955		55,285
2004	2,095	9,169	23,584	20,771		55,619
2005	2,001	7,364	26,673	25,112		61,150
2006	2,530	8,660	32,115	27,682		70,987
2007	2,349	9,003	32,404	32,361		76,117
2008	1,716	6,650	20,083	22,728		51,177
2009	1,367	4,073	11,719	13,744		30,903
2010	1,480	4,772	16,279	17,802		40,333
2011	1,773	5,041	18,256	20,347		45,417
Total	33,122	78,258	265,747	270,491	0	647,618

Table 28.E.2
Small Business Loans Originated: \$100,001 to \$250,000 by Tract MFI
 28. Mahoning 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	23	23	63	90		199
2001	20	15	76	104		215
2002	22	20	75	134		251
2003	5	29	87	111		232
2004	6	30	81	101		218
2005	6	44	75	115		240
2006	13	25	76	86		200
2007	7	33	85	99		224
2008	12	21	36	69		138
2009	14	31	63	57		165
2010	5	27	48	67		147
2011	15	30	83	92		220
Total	148	328	848	1,125	0	2,449
Loan Amount (\$1,000s)						
2000	3,860	3,414	11,093	15,737		34,104
2001	3,459	2,790	12,875	19,333		38,457
2002	3,571	3,400	12,792	23,246		43,009
2003	895	5,069	14,508	19,648		40,120
2004	1,113	5,178	14,420	17,727		38,438
2005	1,225	7,921	13,198	20,028		42,372
2006	2,402	4,687	13,291	14,939		35,319
2007	1,278	5,840	14,460	17,228		38,806
2008	2,115	3,739	6,698	11,789		24,341
2009	2,450	5,700	11,227	9,636		29,013
2010	1,068	5,001	8,347	12,171		26,587
2011	2,618	5,715	14,274	16,314		38,921
Total	26,054	58,454	147,183	197,796	0	429,487

Table 28.E.3
Small Business Loans Originated: More than \$250,000 by Tract MFI
 28. Mahoning 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	19	13	60	87		179
2001	28	14	61	118		221
2002	19	12	66	140		237
2003	12	28	66	88		194
2004	9	37	89	95		230
2005	7	36	54	87		184
2006	4	33	57	91		185
2007	5	34	55	99		193
2008	6	30	44	79		159
2009	7	31	63	81		182
2010	20	36	62	92		210
2011	10	40	71	84		205
Total	146	344	748	1,141	0	2,379
Loan Amount (\$1,000s)						
2000	11,193	4,771	28,940	43,862		88,766
2001	14,481	7,828	28,587	61,409		112,305
2002	9,517	6,877	30,993	72,265		119,652
2003	6,334	15,156	33,299	44,914		99,703
2004	4,844	19,261	45,069	51,762		120,936
2005	4,119	18,992	28,219	45,033		96,363
2006	2,173	18,520	29,525	45,189		95,407
2007	2,725	16,582	26,906	48,039		94,252
2008	3,850	15,290	22,435	37,402		78,977
2009	3,744	16,919	30,778	41,791		93,232
2010	9,847	19,208	32,538	43,524		105,117
2011	5,134	21,818	35,330	42,502		104,784
Total	77,961	181,222	372,619	577,692	0	1,209,494

Table 28.E.4
Small Business Loans to Businesses with Gross Annual Revenues of Less Than \$1 Million by Tract MFI
 28. Mahoning 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	112	157	658	702		1,629
2001	170	145	741	815		1,871
2002	93	113	556	660		1,422
2003	73	272	777	811		1,933
2004	62	238	701	713		1,714
2005	49	285	1,069	993		2,396
2006	65	304	1,131	1,050		2,550
2007	68	328	1,174	1,136		2,706
2008	36	192	738	744		1,710
2009	18	92	351	368		829
2010	25	117	384	420		946
2011	34	158	552	611		1,355
Total	805	2,401	8,832	9,023	0	21,061
Loan Amount (\$1,000s)						
2000	5,215	5,540	28,712	34,655		74,122
2001	5,544	4,695	29,105	51,230		90,574
2002	6,471	6,745	35,904	54,512		103,632
2003	5,720	10,560	35,050	38,351		89,681
2004	3,689	8,948	30,176	44,017		86,830
2005	2,013	9,068	29,761	41,439		82,281
2006	1,787	9,793	33,367	45,335		90,282
2007	1,310	8,568	26,956	39,973		76,807
2008	1,242	4,600	14,366	27,987		48,195
2009	469	3,979	15,064	26,056		45,568
2010	1,387	7,068	15,731	22,508		46,694
2011	2,663	5,129	19,640	27,466		54,898
Total	37,510	84,693	313,832	453,529	0	889,564

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 28.F.1
Fair Housing Complaints by Basis
28. Mahoning County
2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color					2					2
Disability	5		3	7	3	1	2	3	2	26
Family Status	1	2	3	1		1	1	1	2	12
National Origin					1				1	2
Race	3	1	1	4	2	4	3	2	4	24
Religion	1		1		1			1	1	5
Sex				2						2
Total Bases	10	3	8	14	9	6	6	7	10	73
Total Complaints	8	3	7	14	6	6	6	6	6	62

Table 28.F.2
Fair Housing Complaints by Issue
28. Mahoning County
2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Discriminatory advertisement - rental			2		1	1		1		5
Discriminatory refusal to rent and negotiate for rental				2			1		1	4
Other discriminatory acts		1			1			1	1	4
Discriminatory acts under Section 818 (coercion, etc.)			1	1				1	1	4
Discriminatory advertising, statements, and notices							1	1	1	3
Discriminatory financing (includes real estate transactions)					1		1	1		3
Otherwise deny or make housing available	1						1		1	3
Discriminatory refusal to sell				1					1	2
False denial or representation of availability	1						1			2
False denial or representation of availability - rental					1				1	2
Discrimination in terms, conditions or privileges relating to rental	3	2	1	1	1	3	3	1		15
Discriminatory refusal to rent	1			6		1			2	10
Discriminatory terms, conditions, privileges, or services and facilities	1		2	1	1	1		2	2	10
Failure to make reasonable accommodation	3		3	1	1		1	1		10
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
Discrimination in services and facilities relating to rental							1			1
Steering							1			1
Failure to provide usable doors	1									1
Failure to permit reasonable modification				1						1
Total Issues	11	3	9	14	8	6	12	9	13	85
Total Complaints	8	3	7	14	6	6	6	6	6	62

Table 28.F.3
Fair Housing Complaints by Closure Status
 28. Mahoning County
 2004–2012 HUD Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Administrative Closure Cause (FHAP)		1	1	3		3	3	1	1	13
Conciliated / Settled	5	1	3	8	3	1	2	1		24
No Cause	3	1	2	3	3	2	1	2	1	18
Open									4	4
Total Complaints	8	3	7	14	6	6	6	6	6	62

HUD Complaints Found With Cause

Table 28.F.4
Fair Housing Complaints Found With Cause by Basis
 28. Mahoning County
 2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability	4		2	5	3		2	1		17
Family Status		1	2	1				1		5
Race	2			1		1				4
Sex				1						1
Total Bases	6	1	4	8	3	1	2	2		27
Total Complaints	5	1	4	8	3	1	2	3		27

Table 28.F.5
Fair Housing Complaints Found With Cause by Issue
 28. Mahoning County
 2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Failure to make reasonable accommodation			3		2	1	1		1	9
Discriminatory refusal to rent			1			3		1		5
Discriminatory terms, conditions, privileges, or services and facilities			1		1	1				4
Discrimination in terms, conditions or privileges relating to rental				1		1		1		4
Discriminatory advertisement - rental					2				1	3
Discriminatory refusal to sell						1				1
False denial or representation of availability			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
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	8	1	6	8	3	1	3	4	0	34
Total Complaints	5	1	4	8	3	1	2	3		27

OHIO CIVIL RIGHTS COMMISSION COMPLAINTS

Table 28.F.6
Fair Housing Complaints by Basis
 28. Mahoning County
 2004–2012 OCRC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Age	1									1
Color				1		3				4

Disability	4		3	6	1	2	3	2	1	22
Family Status			3	2			1			6
Gender			1	3		1	1			6
Race	4		2	4	5	2	2	1	2	22
Religion	1			1	1			1		4
Retaliation				2	1			1	1	5
Total Bases	10	0	9	19	5	11	7	5	4	70
Total Complaints	7		7	15	3	7	7	3	3	52

Table 28.F.7
Fair Housing Complaints by Issue
 28. Mahoning County
 2004–2012 OCRRC 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	2	1			2	7
Other	3			5		1	2	2	1	14
Reasonable Accommodation	2		1				1			4
Terms and Conditions	2		7	11	2	6	5	1	2	36
Total Issues	7	0	10	21	4	8	8	3	5	66
Total Complaints	7		7	15	3	7	7	3	3	52

Table 28.F.8
Fair Housing Complaints by Closure Status
 28. Mahoning County
 2004–2012 OCRRC Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
CP Failed to Cooperate				3		1	2	1		7
CP Withdrawal – No Benefit				1			1		1	3
No Cause Finding Issued	3		4	4	2	5	1	1	1	21
No Jurisdiction									1	1
Settlement With Benefits	3		1	5			2			11
Successful Conciliation			1							1
Withdrawal With Benefits	1		1	2	1	1	1	1		8
Total Complaints	7	0	7	15	3	7	7	3	3	52

FAIR HOUSING CONTACT SERVICE COMPLAINTS

Table 28.F.9
Fair Housing Complaints by Basis
28. Mahoning County
2004–2012 FHCS Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability				1	2					3
Familial Status					2			1		3
Race					1					1
Total Bases	0	0	0	1	5	0	0	1	0	7
Total Complaints				1	5			1		7

Table 28.F.10
Fair Housing Complaints by Closure Status
28. Mahoning County
2004–2012 FHCS Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Inquiry					1					1
Lack of jurisdiction					3					3
No probable cause				1						1
Pending										0
Probable cause								1		1
Withdrawal of Charge					1					1
Total Complaints	0	0	0	1	5	0	0	1	0	7

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 28.G.1
Primary Role of Respondent
28. Mahoning County
2012–2013 Fair Housing Survey for Housing
Stakeholders Data

Primary Role	Total
Advocate/Service Provider	5
Condo or Homeowner Association Leader	1
Construction/Development	2
Law/Legal Services	1
Local Government	2
Property Management	3
Real Estate	5
Other Role	3
Total	22

FEDERAL, STATE, AND LOCAL LAWS

Table 28.G.2
Familiarity with Fair
Housing Laws
28. Mahoning County
2012–2013 Fair Housing Survey
for Housing Stakeholders Data

Familiarity	Total
Not Familiar	2
Somewhat Familiar	7

Very Familiar	7
Missing	6
Total	22

Table 28.G.3
Perceptions About Fair Housing Laws

28. Mahoning 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?	17			5	22
Are fair housing laws difficult to understand or follow?	5	8	4	5	22
Do you think fair housing laws should be changed?	2	7	8	5	22
Do you think fair housing laws are adequately enforced?	10	6	1	5	22

Table 28.G.4
Fair Housing Activities

28. Mahoning 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?		10	6	1	5	22
Have you participated in fair housing training?		9	1		12	22
Are you aware of any fair housing testing?		4	7	6	5	22
Testing and education	Too Little	Right Amount	Too Much	Don't Know	Missing	Total
Is there sufficient outreach and education activity?	8	3		6	5	22
Is there sufficient testing?	2			15	5	22

Table 28.G.5
Protected Classes

28. Mahoning County
2012–2013 Fair Housing Survey
for Housing Stakeholders Data

Protected Class	Total
Family Status	5
Religion	7
Gender	7
National Origin	2
Color	3
Sexual Orientation	2
Age	6
Military	2
Disability	1
Ancestry	2
Ethnicity	2
Total	39

Table 28.G.6
Fair Housing Violation Referrals

28. Mahoning County
2012–2013 Fair Housing Survey for Housing
Stakeholders Data

Referral	Total
County	2
HUD	2
Legal Aid	3
OCRC	2
Other	1

Youngstown Human Relations Commission	6
Total	16

LOCAL FAIR HOUSING

Table 28.G.7

Local Fair Housing

28. Mahoning 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?	6	7	3	6	22
Are there any specific geographic areas that have fair housing problems?	3	4	7	8	22
Are there any specific groups in that face housing discrimination?	7	3	6	6	22

FAIR HOUSING IN THE PRIVATE SECTOR

Table 28.G.8

Barriers to Fair Housing in the Private Sector

28. Mahoning 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	7	2	7	22
The real estate industry?	3	8	4	7	22
The mortgage and home lending industry?	6	4	5	7	22
The housing construction or accessible housing design fields?	3	5	7	7	22
The home insurance industry?	4	5	6	7	22
The home appraisal industry?	1	5	9	7	22
Any other housing services?		5	9	8	22

FAIR HOUSING IN THE PUBLIC SECTOR

Table 28.G.9

Barriers to Fair Housing in the Public Sector

28. Mahoning 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?	4	7	5	6	22
Zoning laws?	5	6	4	7	22
Occupancy standards or health and safety codes?	1	5	9	7	22
Property tax policies?	2	5	9	6	22
Permitting process?		5	11	6	22
Housing construction standards?		6	10	6	22
Neighborhood or community development policies?	4	7	5	6	22
Limited access to government services, such as employment services?	5	6	5	6	22
Public administrative actions or regulations?		5	10	7	22

NARRATIVE COMMENTS

Federal, State, and Local Laws

Table 28.G.10

How did you become aware of fair housing laws?

28. Mahoning County

2013 Fair Housing Survey Data

Comments:
<p>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. In the past I was a landlord; also, I have been asked by a number of international students to intervene in tenant/landlord disputes. real estate classes, trainings, etc.. Real Estate Investors Assoc education Real estate law Work on a housing services board.</p>

Table 28.G.11

How should fair housing laws be changed?

28. Mahoning County

2013 Fair Housing Survey Data

Comments:
<p>Need to include sexual orientation Those reentering Income Think laws should be updated to reflex issues and concern revelant to a changing conditions.</p>

Local Fair Housing

Table 28.G.13

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

28. Mahoning County

2013 Fair Housing Survey Data

Comments:
<p>north side Summer wind development. And barnstone development. The urban centers of Youngstown and Warren have too few safe and affordable housing options.</p>

Table 28.G.14
Are there any specific groups in that face housing discrimination?

28. Mahoning County
 2013 Fair Housing Survey Data

Comments:
<p>disabled 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 wit, monthly and yearly, on lease renwals 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.</p>

Table 28.G.15
Please share any additional comments.

28. Mahoning County
 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 28.G.16
Are you aware of any questionable practices or barriers to fair housing choice in the rental housing market?

28. Mahoning County
 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 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.</p>

Table 28.G.17
Are you aware of any questionable practices or barriers to fair housing choice in the real estate industry?

28. Mahoning County
 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. Again race plays a part. I only "know" this anecdotally. See above answer in block number 1.</p>

Table 28.G.18**Are you aware of any questionable practices or barriers to fair housing choice in the mortgage and home lending industry?**

28. Mahoning County
2013 Fair Housing Survey Data

Comments:
<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>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 28.G.19**Are you aware of any questionable practices or barriers to fair housing choice in the housing construction or accessible housing design fields?**

28. Mahoning County
2013 Fair Housing Survey Data

Comments:
<p>Enforcement, Enforcement, Enforcement.</p> <p>Handicapped accessibility is required by law.</p> <p>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</p>

Table 28.G.20**Are you aware of any questionable practices or barriers to fair housing choice in the home insurance industry?**

28. Mahoning County
2013 Fair Housing Survey Data

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

Table 28.G.21**Are you aware of any questionable practices or barriers to fair housing choice in the home appraisal industry?**

28. Mahoning County
2013 Fair Housing Survey Data

Comments:
<p>But, I would assume there is.</p>

Table 28.G.22**Are you aware of any questionable practices or barriers to fair housing choice in any other housing services?**

28. Mahoning County
2013 Fair Housing Survey Data

Comments:
<p>Crappy, unsafe, substandard rental units and rental houses for the poor.</p>

Fair Housing in the Public Sector

Table 28.G.23

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

28. Mahoning County
2013 Fair Housing Survey Data

Comments:
big lot zoning, NIMBY concerning affordable housing Low-income housing is concentrated in areas bordering industrial sites. Youngstown is currently updating their zoning code but the current code limits these types of uses in specific zoned areas.

Table 28.G.24

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

28. Mahoning County
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 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! Laws 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 28.G.25

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

28. Mahoning County
2013 Fair Housing Survey Data

Comments:
Codes have not been enforced in low-income neighborhoods for years. It is getting better. See box 2 above.

Table 28.G.26

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

28. Mahoning County
2013 Fair Housing Survey Data

Comments:
City of Youngstown, especially around the YSU and Wick Park areas.

Table 28.G.27

Are you aware of any questionable practices or barriers to fair housing choice in housing construction standards?

28. Mahoning County
2013 Fair Housing Survey Data

Comments:
But sometimes, the permitting agencies don't know the standards thoroughly.

Table 28.G.28**Are you aware of any questionable practices or barriers to fair housing choice in neighborhood or community development policies?**28. Mahoning County
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 reisidential locations, even if the out of town owner has the bldg on the market ot sell. Low-inome housing is not near to transportation or jobs creating a disparate impact on people of color and females.

Table 28.G.29**Are you aware of any barriers that limit access to government services, such as a lack of transportation or employment services?**28. Mahoning County
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 options poor. Youngstown recently cut back on bus service due to budget cuts.

Table 28.G.30**Are you aware of any questionable practices or barriers to fair housing choice in any other public administrative actions or regulations?**28. Mahoning County
2013 Fair Housing Survey Data

Comments:
Canfield zoning Canfield trustees Canfield residents

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 Mahoning County that received and completed the survey.¹⁸

¹⁸ 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 28.H.1
Housing Development
 28. Mahoning 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"?	4	0	6	6	16
Guidelines that encourage development affordable housing units?	3	4	4	5	16
Any potential barriers to the development of low- to moderate- income housing?	5	5	1	5	16
Guidelines that allow the development of mixed use housing?	5		6	5	16
Any potential barriers to the development of mixed use housing?	2	3	6	5	16
Occupancy Standards					
A definition for the term "family"?	4	1	6	5	16
Residential occupancy standards or limits?	4	1	6	5	16
Special Needs Housing					
A definition for the term "disability"?	3	2	5	6	16
Development standards for making housing accessible to persons with disabilities?	3	3	4	6	16
A process by which persons with disabilities can request modification to the jurisdiction's policies?	3	2	5	6	16
Standards for the development of senior housing?	2	5	3	6	16
Guidelines that distinguish senior citizen housing from other residential uses?	1	3	6	6	16
Guidelines for developing housing for any other special needs populations?	3	1	6	6	16
Fair Housing Policies					
A fair housing ordinance, policy, or regulation?	4	1	4	7	16
Policies or practices for "affirmatively furthering fair housing"?	2	2	4	8	16

I. IMPEDIMENTS

The 2013 Northeast Ohio Regional Analysis of Impediments to Fair Housing Choice uncovered several potential issues regarding fair housing in the Mahoning 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 Mahoning 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 in Mahoning County.

Results of the Fair Housing Surveys indicate that a number of local communities in the County lack or do not have sufficient policies or practices that adequately address the duty to affirmatively further fair housing.

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 Mahoning 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 Mahoning 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 County 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 communities within the County 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 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. 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 in Mahoning 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 28.I.1
Impediments Matrix
 28. Mahoning 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 ¹⁹		
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

¹⁹ 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.

29. CITY OF YOUNGSTOWN

A. CENSUS BUREAU DATA

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

Table 29.A.1

Population by Age

29. City of Youngstown
2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Under 5	5,851	7.1%	4,318	6.4%	-26.2%
5 to 19	17,800	21.7%	13,242	19.8%	-25.6%
20 to 24	5,774	7.0%	5,031	7.5%	-12.9%
25 to 34	10,233	12.5%	8,481	12.7%	-17.1%
35 to 54	21,543	26.3%	17,119	25.6%	-20.5%
55 to 64	6,526	8.0%	8,235	12.3%	26.2%
65 or Older	14,299	17.4%	10,556	15.8%	-26.2%
Total	82,026	100.0%	66,982	100.0%	-18.3%

Table 29.A.2

Elderly Population by Age

29. City of Youngstown
2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
65 to 66	1,262	8.8%	999	9.5%	-20.8%
67 to 69	1,984	13.9%	1,429	13.5%	-28.0%
70 to 74	3,817	26.7%	2,173	20.6%	-43.1%
75 to 79	3,256	22.8%	2,019	19.1%	-38.0%
80 to 84	2,236	15.6%	1,996	18.9%	-10.7%
85 or Older	1,744	12.2%	1,940	18.4%	11.2%
Total	14,299	100.0%	10,556	100.0%	-26.2%

Table 29.A.3

Population by Race and Ethnicity

29. City of Youngstown
2000 & 2010 Census SF1 Data

Race	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
White	41,737	50.9%	31,508	47.0%	-24.5%
Black	35,937	43.8%	30,257	45.2%	-15.8%
American Indian	246	.3%	237	.4%	-3.7%
Asian	267	.3%	297	.4%	11.2%
Native Hawaiian/ Pacific Islander	29	.0%	17	.0%	-41.4%
Other	1,797	2.2%	2,193	3.3%	22.0%
Two or More Races	2,013	2.5%	2,473	3.7%	22.9%
Total	82,026	100.0%	66,982	100.0%	-18.3%
Non-Hispanic	77,744	94.8	60,775	90.7%	-21.8%
Hispanic	4,282	5.2%	6,207	9.3%	45.0%

Table 29.A.4
Disability by Age
 29. City of Youngstown
 2010 Three-Year ACS Data

Age	Male		Female		Total	
	Disabled Population	Disability Rate	Disabled Population	Disability Rate	Disabled Population	Disability Rate
Under 5	56	3.0%	20	1.0%	76	2.0%
5 to 17	653	11.0%	730	13.9%	1,383	12.4%
18 to 34	789	10.6%	855	12.3%	1,644	11.4%
35 to 64	3,111	26.8%	3,069	24.0%	6,180	25.3%
65 to 74	412	21.3%	901	31.8%	1,313	27.5%
75 or Older	1,201	56.5%	2,070	56.0%	3,271	56.2%
Total	6,222	20.1%	7,645	22.8%	13,867	21.5%

Table 29.A.5
Employment Status by Disability and Type: Age 18 to 64
 29. City of Youngstown
 2010 Three-Year ACS Data

Disability Status	Population
Employed:	21,995
With a disability:	2,492
With a hearing difficulty	727
With a vision difficulty	407
With a cognitive difficulty	704
With an ambulatory difficulty	958
With a self-care difficulty	161
With an independent living difficulty	522
No disability	19,503
Unemployed:	5,294
With a disability:	905
With a hearing difficulty	85
With a vision difficulty	222
With a cognitive difficulty	453
With an ambulatory difficulty	435
With a self-care difficulty	168
With an independent living difficulty	351
No disability	4,389
Not in labor force:	11,475
With a disability:	4,427
With a hearing difficulty	449
With a vision difficulty	503
With a cognitive difficulty	2,431
With an ambulatory difficulty	2,852
With a self-care difficulty	952
With an independent living difficulty	1,776
No disability	7,048
Total	38,764

Table 29.A.6**Households by Income**

29. City of Youngstown

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	10,617	33.0%	8,980	31.5%
\$15,000 to \$19,999	3,178	9.9%	2,920	10.2%
\$20,000 to \$24,999	2,696	8.4%	2,662	9.3%
\$25,000 to \$34,999	5,053	15.7%	4,052	14.2%
\$35,000 to \$49,999	4,771	14.8%	3,823	13.4%
\$50,000 to \$74,999	3,809	11.8%	3,845	13.5%
\$75,000 to \$99,999	1,229	3.8%	1,276	4.5%
\$100,000 or More	854	2.7%	962	3.4%
Total	32,207	100.0%	28,520	100.0%

Table 29.A.7**Poverty by Age**

29. City of Youngstown

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	2,958	15.5%	2,597	12.2%
6 to 17	4,703	24.6%	5,505	25.9%
18 to 64	9,655	50.5%	11,497	54.1%
65 or Older	1,811	9.5%	1,641	7.7%
Total	19,127	100.0%	21,240	100.0%
Poverty Rate	24.8%	.	32.7%	.

Table 29.A.8**Households by Year Home Built**

29. City of Youngstown

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	11,418	35.5%	10,914	38.3%
1940 to 1949	6,015	18.7%	4,261	14.9%
1950 to 1959	8,160	25.4%	6,789	23.8%
1960 to 1969	3,315	10.3%	3,151	11.0%
1970 to 1979	2,139	6.6%	1,506	5.3%
1980 to 1989	666	2.1%	781	2.7%
1990 to 1999	464	1.4%	597	2.1%
2000 to 2004	.	.	385	1.3%
2005 or Later	.	.	136	.5%
Total	32,177	100.0%	28,520	100.0%

Table 29.A.9**Housing Units by Type**

29. City of Youngstown

2000 Census SF3 & 2010 Five-Year ACS Data

Unit Type	2000 Census		2010 Five-Year ACS	
	Units	% of Total	Units	% of Total
Single-Family	28,951	77.9%	28,282	79.5%
Duplex	2,194	5.9%	2,229	6.3%
Tri- or Four-Plex	1,682	4.5%	1,269	3.6%
Apartment	4,241	11.4%	3,638	10.2%
Mobile Home	90	.2%	143	.4%
Boat, RV, Van, Etc.	0	.0%	0	.0%
Total	37,158	100.0%	35,561	100.0%

Table 29.A.10**Housing Units by Tenure**

29. City of Youngstown

2000 & 2010 Census SF1 Data

Tenure	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
Occupied Housing Units	32,177	86.6%	26,839	81.0%	-16.6%
Owner-Occupied	20,605	64.0%	15,639	58.3%	-24.1%
Renter-Occupied	11,572	36.0%	11,200	41.7%	-3.2%
Vacant Housing Units	4,982	13.4%	6,284	19.0%	26.1%
Total Housing Units	37,159	100.0%	33,123	100.0%	-10.9%

Table 29.A.11**Disposition of Vacant Housing Units**

29. City of Youngstown

2000 & 2010 Census SF1 Data

Disposition	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
For Rent	1,509	30.3%	1,408	22.4%	-6.7%
For Sale	478	9.6%	514	8.2%	7.5%
Rented or Sold, Not Occupied	1,883	37.8%	234	3.7%	-87.6%
For Seasonal, Recreational, or Occasional Use	78	1.6%	61	1.0%	-21.8%
For Migrant Workers	0	0.0%	0	.0%	.
Other Vacant	1,034	20.8%	4,067	64.7%	293.3%
Total	4,982	100.0%	6,284	100.0%	26.1%

Table 29.A.12**Households by Household Size**

29. City of Youngstown

2000 & 2010 Census SF1 Data

Size	2000 Census		2010 Census		% Change 00-10
	Households	% of Total	Households	% of Total	
One Person	10,937	34.0%	10,148	37.8%	-7.2%
Two Persons	9,625	29.9%	7,854	29.3%	-18.4%
Three Persons	4,985	15.5%	4,015	15.0%	-19.5%
Four Persons	3,508	10.9%	2,558	9.5%	-27.1%
Five Persons	1,801	5.6%	1,316	4.9%	-26.9%
Six Persons	806	2.5%	533	2.0%	-33.9%
Seven Persons or More	515	1.6%	415	1.5%	-19.4%
Total	32,177	100.0%	26,839	100.0%	-16.6%

Table 29.A.13
Household Type by Tenure
 29. City of Youngstown
 2000 & 2010 Census SF1 Data

Household Type	2000 Census		2010 Census		% Change 00–10
	Households	% of Total	Households	% of Total	
Family Households	19,729	61.3%	15,150	56.4%	-23.2%
Married-Couple Family	10,691	54.2%	6,878	45.4%	-35.7%
Owner-Occupied	8,994	84.1%	5,584	81.2%	-37.9%
Renter-Occupied	1,697	15.9%	1,294	18.8%	-23.7%
Other Family	9,038	45.8%	8,272	54.6%	-8.5%
Male Householder, No Spouse	1,675	18.5%	1,613	19.5%	-3.7%
Owner-Occupied	1,121	66.9%	975	60.4%	-13.0%
Renter-Occupied	554	33.1%	638	39.6%	15.2%
Female Householder, No Spouse	7,363	81.5%	6,659	80.5%	-9.6%
Owner-Occupied	3,496	47.5%	2,722	40.9%	-22.1%
Renter-Occupied	3,867	52.5%	3,937	59.1%	1.8%
Non-Family Households	12,448	38.7%	11,689	43.6%	-6.1%
Owner-Occupied	6,994	56.2%	6,358	54.4%	-9.1%
Renter-Occupied	5,454	43.8%	5,331	45.6%	-2.3%
Total	32,177	100.0%	26,839	100.0%	-16.6%

Table 29.A.14
Group Quarters Population
 29. City of Youngstown
 2000 & 2010 Census SF1 Data

Group Quarters Type	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Institutionalized					
Correctional Institutions	2,493	71.3%	3,223	82.0%	29.3%
Juvenile Facilities	.	.	62	1.6%	.
Nursing Homes	723	20.7%	644	16.4%	-10.9%
Other Institutions	282	8.1%	0	.0%	-100.0%
Total	3,498	100.0%	3,929	100.0%	12.3%
Noninstitutionalized					
College Dormitories	848	56.7%	1,245	65.5%	46.8%
Military Quarters	0	.0%	0	.0%	.
Other Noninstitutional	648	43.3%	657	34.5%	1.4%
Total	1,496	30.0%	1,902	32.6%	27.1%
Total Group Quarters Population	4,994	100.0%	5,831	100.0%	16.8%

Table 29.A.15
Overcrowding and Severe Overcrowding
 29. City of Youngstown
 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	20,362	98.8%	174	.8%	64	.3%	20,600
2010 ACS	17,249	99.3%	118	.7%	0	.0%	17,367
Renter							
2000 Census	11,195	96.7%	270	2.3%	112	1.0%	11,577
2010 ACS	11,000	98.6%	87	.8%	66	.6%	11,153
Total							
2000 Census	31,557	98.1%	444	1.4%	176	.5%	32,177
2010 ACS	28,249	99.0%	205	.7%	66	.2%	28,520

Table 29.A.16
Households with Incomplete Plumbing Facilities
 29. City of Youngstown
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Plumbing Facilities	32,009	28,402
Lacking Complete Plumbing Facilities	168	118
Total Households	32,177	28,520
Percent Lacking	.5%	.4%

Table 29.A.17
Households with Incomplete Kitchen Facilities
 29. City of Youngstown
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Kitchen Facilities	31,982	28,269
Lacking Complete Kitchen Facilities	195	251
Total Households	32,177	28,520
Percent Lacking	.6%	.9%

Table 29.A.18
Cost Burden and Severe Cost Burden by Tenure
 29. City of Youngstown
 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	6,963	70.1%	1,736	17.5%	1,152	11.6%	86	.9%	9,937
2010 ACS	5,557	60.5%	2,113	23.0%	1,445	15.7%	73	.8%	9,188
Owner Without a Mortgage									
2000 Census	8,110	84.2%	792	8.2%	526	5.5%	199	2.1%	9,627
2010 ACS	6,490	79.3%	984	12.0%	608	7.4%	97	1.2%	8,179
Renter									
2000 Census	5,239	45.4%	2,151	18.6%	2,556	22.1%	1,603	13.9%	11,549
2010 ACS	3,718	33.3%	2,369	21.2%	3,735	33.5%	1,331	11.9%	11,153
Total									
2000 Census	20,312	65.3%	4,679	15.0%	4,234	13.6%	1,888	6.1%	31,113
2010 ACS	15,765	55.3%	5,466	19.2%	5,788	20.3%	1,501	5.3%	28,520

Table 29.A.19
Median Housing Costs
 29. City of Youngstown
 2000 Census SF3 & 2010 Five-Year ACS Data

Housing Cost	2000 Census	2010 ACS
Median Contract Rent	\$296	\$389
Median Home Value	\$40,900	\$51,800

B. BLS DATA

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

Table 29.B.1
Labor Force Statistics
 29. City of Youngstown
 1990–2011 BLS Data

Year	Labor Force	Employment	Unemployment	Unemployment Rate	Statewide Unemployment Rate
1990	35,421	30,996	4,425	12.5%	5.7%
1991	35,158	30,863	4,295	12.2%	6.6%
1992	36,592	30,755	5,837	16.0%	7.4%
1993	36,115	30,771	5,344	14.8%	6.7%
1994	36,364	31,210	5,154	14.2%	5.6%
1995	35,844	31,748	4,096	11.4%	4.9%
1996	35,696	31,464	4,232	11.9%	5.0%
1997	35,626	31,695	3,931	11.0%	4.6%
1998	35,341	31,392	3,949	11.2%	4.3%
1999	34,564	31,129	3,435	9.9%	4.3%
2000	31,934	29,086	2,848	8.9%	4.0%
2001	31,572	28,410	3,162	10.0%	4.4%
2002	31,827	27,959	3,868	12.2%	5.7%
2003	30,391	27,569	2,822	9.3%	6.2%
2004	32,239	29,313	2,926	9.1%	6.1%
2005	31,996	29,335	2,661	8.3%	5.9%
2006	31,869	29,381	2,488	7.8%	5.4%
2007	29,147	26,879	2,268	7.8%	5.6%
2008	28,942	26,364	2,578	8.9%	6.5%
2009	28,936	24,966	3,970	13.7%	10.1%
2010	26,332	22,763	3,569	13.6%	10.0%
2011	25,999	22,889	3,110	12.0%	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.²⁰ The information presented in this section presents detailed HMDA data, including denial rates and predatory lending including high annual percentage rate (APR) loans.

Table 29.C.1
Purpose of Loan by Year
29. City of Youngstown
2004–2011 HMDA Data

Purpose	2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	1,660	1,781	1,702	995	553	411	298	266	7,666
Home Improvement	760	829	675	566	471	247	223	111	3,882
Refinancing	3,689	3,547	2,849	1,888	1,076	802	638	562	15,051
Total	6,109	6,157	5,226	3,449	2,100	1,460	1,159	939	26,599

Table 29.C.2
Occupancy Status for Home Purchase Loan Applications
29. City of Youngstown
2004–2011 HMDA Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	Total
Owner-Occupied	1,285	1,412	1,352	798	422	361	273	244	6,147
Not Owner-Occupied	355	353	331	184	130	50	24	21	1,448
Not Applicable	20	16	19	13	1	0	1	1	71
Total	1,660	1,781	1,702	995	553	411	298	266	7,666

Table 29.C.3
Owner-Occupied Home Purchase Loan Applications by Loan Type
29. City of Youngstown
2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Conventional	1,091	1,278	1,243	678	224	132	96	77	4,819
FHA - Insured	159	113	91	103	189	192	164	145	1,156
VA - Guaranteed	35	20	18	17	8	37	11	22	168
Rural Housing Service or Farm Service Agency	0	1	0	0	1	0	2	0	4
Total	1,285	1,412	1,352	798	422	361	273	244	6,147

²⁰ 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 29.C.4
Loan Applications by Action Taken
 29. City of Youngstown
 2004–2011 HMDA Data

Action	2004	2005	2006	2007	2008	2009	2010	2011	Total
Loan Originated	616	640	567	382	210	171	126	99	2,811
Application Approved but not Accepted	135	150	106	46	22	9	7	10	485
Application Denied	220	263	310	186	74	52	54	45	1,204
Application Withdrawn by Applicant	100	158	93	45	16	17	7	7	443
File Closed for Incompleteness	11	15	17	12	6	5	2	4	72
Loan Purchased by the Institution	203	185	259	127	94	107	77	79	1,131
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	1,285	1,412	1,352	798	422	361	273	244	6,147
Denial Rate	26.3%	29.1%	35.3%	32.7%	26.1%	23.3%	30.0%	31.3%	30.0%

Table 29.C.5
Denial Rates by Gender of Applicant
 29. City of Youngstown
 2004–2011 HMDA Data

Year	Male	Female	Not Available	Not Applicable	Average
2004	25.1%	24.0%	60.0%	%	26.3%
2005	26.6%	31.2%	42.1%	%	29.1%
2006	33.7%	35.8%	50.0%	%	35.3%
2007	30.8%	32.2%	62.5%	%	32.7%
2008	25.7%	25.2%	44.4%	%	26.1%
2009	22.1%	25.5%	12.5%	%	23.3%
2010	22.4%	35.4%	43.8%	%	30.0%
2011	29.2%	33.3%	28.6%	%	31.3%
Average	28.0%	30.5%	48.9%	%	30.0%

Table 29.C.6
Loan Applications by Selected Action Taken by Gender of Applicant
 29. City of Youngstown
 2004–2011 HMDA Data

Gender		2004	2005	2006	2007	2008	2009	2010	2011	Total
Male	Originated	353	367	301	207	110	88	66	46	1,538
	Denied	118	133	153	92	38	25	19	19	597
	Denial Rate	25.1%	26.6%	33.7%	30.8%	25.7%	22.1%	22.4%	29.2%	28.0%
Female	Originated	247	251	246	166	95	76	51	48	1,180
	Denied	78	114	137	79	32	26	28	24	518
	Denial Rate	24.0%	31.2%	35.8%	32.2%	25.2%	25.5%	35.4%	33.3%	30.5%
Not Available	Originated	16	22	20	9	5	7	9	5	93
	Denied	24	16	20	15	4	1	7	2	89
	Denial Rate	60.0%	42.1%	50.0%	62.5%	44.4%	12.5%	43.8%	28.6%	48.9%
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	616	640	567	382	210	171	126	99	2,811
	Denied	220	263	310	186	74	52	54	45	1,204
	Denial Rate	26.3%	29.1%	35.3%	32.7%	26.1%	23.3%	30.0%	31.3%	30.0%

Table 29.C.7
Denial Rates by Race/Ethnicity of Applicant
 29. City of Youngstown
 2004–2011 HMDA Data

Race/Ethnicity	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	100.0%	33.3%	33.3%	%	.0%	.0%	%	%	50.0%
Asian	.0%	33.3%	100.0%	.0%	.0%	.0%	%	%	23.1%
Black	36.2%	28.7%	39.7%	37.4%	38.0%	37.5%	26.5%	30.3%	35.2%
White	17.5%	26.2%	29.3%	26.8%	20.2%	20.2%	28.1%	30.7%	24.6%
Not Available	46.3%	45.1%	56.5%	54.5%	40.0%	22.2%	44.0%	40.0%	47.6%
Not Applicable	50.0%	%	%	%	%	0%	0%	%	50.0%
Average	26.3%	29.1%	35.3%	32.7%	26.1%	23.3%	30.0%	31.3%	30.0%
Non-Hispanic	23.3%	27.4%	34.4%	29.9%	25.0%	23.2%	26.4%	28.3%	28.1%
Hispanic	35.1%	31.3%	32.6%	33.3%	36.4%	25.0%	33.3%	57.1%	33.6%

Table 29.C.8
Loan Applications by Selected Action Taken by Race/Ethnicity of Applicant
 29. City of Youngstown
 2004–2011 HMDA Data

Race		2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Originated	0	2	2	0	1	1	0	0	6
	Denied	4	1	1	0	0	0	0	0	6
	Denial Rate	100.0%	33.3%	33.3%	%	.0%	%	%	%	50.0%
Asian	Originated	3	2	0	3	1	1	0	0	10
	Denied	0	1	2	0	0	0	0	0	3
	Denial Rate	.0%	33.3%	100.0%	.0%	.0%	.0%	%	%	23.1%
Black	Originated	134	186	164	114	49	25	25	23	720
	Denied	76	75	108	68	30	15	9	10	391
	Denial Rate	36.2%	28.7%	39.7%	37.4%	38.0%	37.5%	26.5%	30.3%	35.2%
White	Originated	420	394	364	240	150	130	87	70	1,855
	Denied	89	140	151	88	38	33	34	31	604
	Denial Rate	17.5%	26.2%	29.3%	26.8%	20.2%	20.2%	28.1%	30.7%	24.6%
Not Available	Originated	58	56	37	25	9	14	14	6	219
	Denied	50	46	48	30	6	4	11	4	199
	Denial Rate	46.3%	45.1%	56.5%	54.5%	40.0%	22.2%	44.0%	40.0%	47.6%
Not Applicable	Originated	1	0	0	0	0	0	0	0	1
	Denied	1	0	0	0	0	0	0	0	1
	Denial Rate	46.3%	45.1%	56.5%	54.5%	40.0%	22.2%	44.0%	40.0%	50.0%
Total	Originated	616	640	567	382	210	171	126	99	2,811
	Denied	220	263	310	186	74	52	54	45	1,204
	Denial Rate	26.3%	29.1%	35.3%	32.7%	26.1%	23.3%	30.0%	31.3%	30.0%
Non-Hispanic	Originated	504	557	500	337	186	149	106	91	2,430
	Denied	153	210	262	144	62	45	38	36	950
	Denial Rate	23.3%	27.4%	34.4%	29.9%	25.0%	23.2%	26.4%	28.3%	28.1%
Hispanic	Originated	24	33	31	24	14	9	8	3	146
	Denied	13	15	15	12	8	3	4	4	74
	Denial Rate	35.1%	31.3%	32.6%	33.3%	36.4%	25.0%	33.3%	57.1%	33.6%

Table 29.C.9
Loan Applications by Reason for Denial
 29. City of Youngstown
 2004–2011 HMDA Data

Denial Reason	2004	2005	2006	2007	2008	2009	2010	2011	Total
Debt-to-Income Ratio	25	10	26	19	9	12	17	7	125
Employment History	4	5	1	2	1	1	1	1	16
Credit History	51	43	65	43	33	19	18	14	286
Collateral	18	16	21	15	5	3	8	6	92
Insufficient Cash	6	5	2	3	0	1	2	1	20
Unverifiable Information	1	6	7	11	0	0	0	0	25
Credit Application Incomplete	11	12	20	14	5	5	1	6	74
Mortgage Insurance Denied	0	0	0	0	0	0	0	0	0
Other	57	96	58	22	5	5	3	3	249
Missing	47	70	110	57	16	6	4	7	317
Total	220	263	310	186	74	52	54	45	1,204

Table 29.C.10
Denial Rates by Income of Applicant
 29. City of Youngstown
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	35.1%	35.4%	38.5%	43.8%	40.0%	50.0%	52.4%	54.5%	40.9%
\$15,001–\$30,000	27.0%	30.1%	38.2%	33.8%	29.5%	21.6%	27.0%	35.6%	31.4%
\$30,001–\$45,000	25.9%	28.5%	29.2%	31.8%	26.7%	21.0%	23.3%	18.8%	27.5%
\$45,001–\$60,000	21.0%	21.6%	39.8%	18.3%	17.1%	17.9%	29.2%	24.0%	25.0%
\$60,001–\$75,000	22.9%	36.6%	27.3%	35.1%	5.9%	7.1%	14.3%	37.5%	26.6%
Above \$75,000	26.1%	27.5%	28.9%	26.9%	16.7%	16.7%	25.0%	28.6%	26.6%
Data Missing	33.3%	35.0%	47.4%	58.3%	50.0%	100.0%	100.0%	50.0%	45.5%
Total	26.3%	29.1%	35.3%	32.7%	26.1%	23.3%	30.0%	31.3%	30.0%

Table 29.C.11
Denial Rates of Loans by Race/Ethnicity and Income of Applicant
 29. City of Youngstown
 2004–2011 HMDA Data

Race	<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	Above \$75K	Data Missing	Average
American Indian	100.0%	66.7%	60.0%	.0%	%	.0%	%	50.0%
Asian	%	28.6%	.0%	.0%	.0%	33.3%	%	23.1%
Black	41.4%	37.8%	32.5%	26.8%	36.4%	32.5%	66.7%	35.2%
White	40.5%	25.0%	22.5%	20.4%	18.5%	21.9%	38.0%	24.6%
Not Available	40.5%	52.1%	43.6%	47.5%	64.7%	35.7%	55.6%	47.6%
Not Applicable	%	100.0%	%	.0%	%	%	%	50.0%
Average	40.9%	31.4%	27.5%	25.0%	26.6%	26.6%	45.5%	30.0%
Non-Hispanic Ethnicity	40.6%	29.7%	25.4%	23.1%	25.0%	25.8%	40.7%	28.1%
Hispanic (Ethnicity)	41.9%	36.0%	34.5%	13.3%	.0%	25.0%	66.7%	33.6%

Table 29.C.12
Loan Applications by Reason for Denial by Race/Ethnicity of Applicant

29. City of Youngstown
 2004–2011 HMDA Data

Denial Reason	American Indian	Asian	Black	White	Not Available	Not Applicable	Total	Hispanic (Ethnicity)
Debt-to-Income Ratio	1	0	30	79	15	0	125	15
Employment History	0	0	5	7	4	0	16	4
Credit History	3	0	104	145	34	0	286	16
Collateral	0	0	25	57	10	0	92	5
Insufficient Cash	0	0	5	11	4	0	20	0
Unverifiable Information	0	0	9	13	3	0	25	1
Credit Application Incomplete	0	1	25	38	9	1	74	7
Mortgage Insurance Denied	0	0	0	0	0	0	0	0
Other	1	0	90	113	45	0	249	11
Missing	1	2	98	141	75	0	317	15
Total	6	3	391	604	199	1	1,204	74
% Missing	16.7%	66.7%	25.1%	23.3%	37.7%	.0%	26.3%	20.3%

Table 29.C.13
Loan Applications by Income of Applicant: Originated and Denied

29. City of Youngstown
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Loan Originated	37	31	32	27	12	12	10	5	166
	Application Denied	20	17	20	21	8	12	11	6	115
	Denial Rate	35.1%	35.4%	38.5%	43.8%	40.0%	50.0%	52.4%	54.5%	40.9%
\$15,001–\$30,000	Loan Originated	235	267	231	153	79	69	54	38	1,126
	Application Denied	87	115	143	78	33	19	20	21	516
	Denial Rate	27.0%	30.1%	38.2%	33.8%	29.5%	21.6%	27.0%	35.6%	31.4%
\$30,001–\$45,000	Loan Originated	177	183	172	105	63	49	33	26	808
	Application Denied	62	73	71	49	23	13	10	6	307
	Denial Rate	25.9%	28.5%	29.2%	31.8%	26.7%	21.0%	23.3%	18.8%	27.5%
\$45,001–\$60,000	Loan Originated	94	91	71	49	34	23	17	19	398
	Application Denied	25	25	47	11	7	5	7	6	133
	Denial Rate	21.0%	21.6%	39.8%	18.3%	17.1%	17.9%	29.2%	24.0%	25.0%
\$60,001–\$75,000	Loan Originated	27	26	24	24	16	13	6	5	141
	Application Denied	8	15	9	13	1	1	1	3	51
	Denial Rate	22.9%	36.6%	27.3%	35.1%	5.9%	7.1%	14.3%	37.5%	26.6%
Above \$75,000	Loan Originated	34	29	27	19	5	5	6	5	130
	Application Denied	12	11	11	7	1	1	2	2	47
	Denial Rate	26.1%	27.5%	28.9%	26.9%	16.7%	16.7%	25.0%	28.6%	26.6%
Data Missing	Loan Originated	12	13	10	5	1	0	0	1	42
	Application Denied	6	7	9	7	1	1	3	1	35
	Denial Rate	33.3%	35.0%	47.4%	58.3%	50.0%	100.0%	100.0%	50.0%	45.5%
Total	Loan Originated	616	640	567	382	210	171	126	99	2,811
	Application Denied	220	263	310	186	74	52	54	45	1,204
	Denial Rate	26.3%	29.1%	35.3%	32.7%	26.1%	23.3%	30.0%	31.3%	30.0%

Table 29.C.14
Loan Applications by Income and Race/Ethnicity of Applicant: Originated and Denied
 29. City of Youngstown
 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	2	0	1	0	6
	Application Denied	1	2	3	0	0	0	0	6
	Denial Rate	100.0%	66.7%	60.0%	.0%	%	.0%	%	50.0%
Asian	Loan Originated	0	5	1	1	1	2	0	10
	Application Denied	0	2	0	0	0	1	0	3
	Denial Rate	%	28.6%	.0%	.0%	.0%	33.3%	%	23.1%
Black	Loan Originated	41	318	199	104	28	27	3	720
	Application Denied	29	193	96	38	16	13	6	391
	Denial Rate	41.4%	37.8%	32.5%	26.8%	36.4%	32.5%	66.7%	35.2%
White	Loan Originated	103	735	540	258	106	82	31	1,855
	Application Denied	70	245	157	66	24	23	19	604
	Denial Rate	40.5%	25.0%	22.5%	20.4%	18.5%	21.9%	38.0%	24.6%
Not Available	Loan Originated	22	67	66	32	6	18	8	219
	Application Denied	15	73	51	29	11	10	10	199
	Denial Rate	40.5%	52.1%	43.6%	47.5%	64.7%	35.7%	55.6%	47.6%
Not Applicable	Loan Originated	0	0	0	1	0	0	0	1
	Application Denied	0	1	0	0	0	0	0	1
	Denial Rate	%	100.0%	%	.0%	%	%	%	50.0%
Total	Loan Originated	166	1,126	808	398	141	130	42	2,811
	Application Denied	115	516	307	133	51	47	35	1,204
	Denial Rate	40.9%	31.4%	27.5%	25.0%	26.6%	26.6%	45.5%	30.0%
Non-Hispanic Ethnicity	Loan Originated	129	984	695	352	123	115	32	2,430
	Application Denied	88	416	237	106	41	40	22	950
	Denial Rate	40.6%	29.7%	25.4%	23.1%	25.0%	25.8%	40.7%	28.1%
Hispanic (Ethnicity)	Loan Originated	18	64	38	13	9	3	1	146
	Application Denied	13	36	20	2	0	1	2	74
	Denial Rate	41.9%	36.0%	34.5%	13.3%	.0%	25.0%	66.7%	33.6%

PREDATORY LENDING

Table 29.C.15
Originated Owner-Occupied Loans by HAL Status
 29. City of Youngstown
 2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Other	371	282	239	249	151	145	126	99	1,662
HAL	245	358	328	133	59	26	0	0	1,149
Total	616	640	567	382	210	171	126	99	2,811
Percent HAL	39.8%	55.9%	57.8%	34.8%	28.1%	15.2%	.0%	.0%	40.9%

Table 29.C.16
Loans by Loan Purpose by HAL Status
 29. City of Youngstown
 2004–2011 HMDA Data

Loan Purpose	2004	2005	2006	2007	2008	2009	2010	2011	Total
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Home Purchase	Other	371	282	239	249	151	145	126	99	1,662
	HAL	245	358	328	133	59	26	0	0	1,149
	Percent HAL	39.8%	55.9%	57.8%	34.8%	28.1%	15.2%	.0%	.0%	40.9%
Home Improvement	Other	97	96	96	97	72	48	53	19	578
	HAL	55	71	61	41	21	14	5	0	268
	Percent HAL	36.2%	42.5%	38.9%	29.7%	22.6%	22.6%	8.6%	.0%	31.7%
Refinancing	Other	472	296	247	177	96	156	166	154	1,764
	HAL	358	417	341	159	88	44	1	3	1,411
	Percent HAL	43.1%	58.5%	58.0%	47.3%	47.8%	22.0%	.6%	1.9%	44.4%
Total	Other	940	674	582	523	319	349	345	272	4,004
	HAL	658	846	730	333	59	26	0	0	2,828
	Percent HAL	41.2%	55.7%	55.6%	38.9%	34.5%	19.4%	1.7%	1.1%	41.4%

Table 29.C.17
HALs Originated by Race of Borrower
 29. City of Youngstown
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	0	1	2	0	0	0	0	0	3
Asian	2	1	0	1	1	0	0	0	5
Black	64	123	119	58	11	4	0	0	379
White	137	187	181	63	44	18	0	0	630
Not Available	41	46	26	11	3	4	0	0	131
Not Applicable	1	0	0	0	0	0	0	0	1
Total	245	358	328	133	59	26	0	0	1,149
Hispanic (Ethnicity)	8	18	20	7	6	2	0	0	61

Table 29.C.18
Rate of HALs Originated by Race/Ethnicity of Borrower
 29. City of Youngstown
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	%	50.0%	100.0%	%	.0%	.0%	%	%	50.0%
Asian	66.7%	50.0%	%	33.3%	100.0%	.0%	%	%	50.0%
Black	47.8%	66.1%	72.6%	50.9%	22.4%	16.0%	.0%	.0%	52.6%
White	32.6%	47.5%	49.7%	26.3%	29.3%	13.8%	.0%	.0%	34.0%
Not Available	70.7%	82.1%	70.3%	44.0%	33.3%	28.6%	.0%	.0%	59.8%
Not Applicable	100.0%	%	%	%	%	%	%	%	100%
Average	39.8%	55.9%	57.8%	34.8%	28.1%	15.2%	0.0%	0.0%	40.9%
Non-Hispanic Ethnicity	36.9%	54.0%	56.8%	34.7%	26.9%	14.1%	%	%	%
Hispanic (Ethnicity)	33.3%	54.5%	64.5%	29.2%	42.9%	22.2%	.0%	.0%	41.8%

Table 29.C.19
Loans by HAL Status by Race/Ethnicity of Borrower
 29. City of Youngstown
 2004–2011 HMDA Data

Race	Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Other	0	1	0	0	1	1	0	0	3
	HAL	0	1	2	0	0	0	0	0	3
	Percent HAL	%	50.0%	100.0%	%	.0%	.0%	%	%	50.0%
Asian	Other	1	1	0	2	0	1	0	0	5
	HAL	2	1	0	1	1	0	0	0	5
	Percent HAL	66.7%	50.0%	%	33.3%	100.0%	.0%	%	%	50.0%
Black	Other	70	63	45	56	38	21	25	23	341
	HAL	64	123	119	58	11	4	0	0	379
	Percent HAL	47.8%	66.1%	72.6%	50.9%	22.4%	16.0%	.0%	.0%	52.6%
White	Other	283	207	183	177	106	112	87	70	1,225
	HAL	137	187	181	63	44	18	0	0	630
	Percent HAL	32.6%	47.5%	49.7%	26.3%	29.3%	13.8%	0.0%	0.0%	34.0%
Not Available	Other	17	10	11	14	6	10	14	6	88
	HAL	41	46	26	11	3	4	0	0	131
	Percent HAL	70.7%	82.1%	70.3%	44.0%	33.3%	28.6%	.0%	.0%	59.8%
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	371	282	239	249	151	145	126	99	1,662
	HAL	245	358	328	133	59	26	0	0	1,149
	Percent HAL	39.8%	55.9%	57.8%	34.8%	28.1%	15.2%	.0%	.0%	40.9%
Non-Hispanic Ethnicity	Other	318	256	216	220	136	128	106	91	1,471
	HAL	186	301	284	117	50	21			
	Percent HAL	36.9%	54.0%	56.8%	34.7%	26.9%	14.1%	%	%	%
Hispanic (Ethnicity)	Other	16	15	11	17	8	7	8	3	85
	HAL	8	18	20	7	6	2	0	0	61
	Percent HAL	33.3%	54.5%	64.5%	29.2%	42.9%	22.2%	.0%	.0%	41.8%

Table 29.C.20
Rates of HALs by Income of Borrower
 29. City of Youngstown
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Average
\$15,000 or Below	43.2%	54.8%	56.3%	40.7%	41.7%	8.3%	.0%	.0%	41.0%
\$15,001–\$30,000	43.8%	68.5%	67.5%	41.8%	22.8%	13.0%	.0%	.0%	47.3%
\$30,001–\$45,000	37.3%	43.7%	54.7%	35.2%	30.2%	14.3%	.0%	.0%	37.5%
\$45,001–\$60,000	39.4%	57.1%	52.1%	20.4%	41.2%	21.7%	.0%	.0%	38.9%
\$60,001–\$75,000	29.6%	38.5%	37.5%	29.2%	18.8%	30.8%	.0%	.0%	29.1%
Above \$75,000	26.5%	37.9%	37.0%	15.8%	.0%	.0%	0.0%	.0%	25.4%
Data Missing	50.0%	38.5%	40.0%	20.0%	.0%	%	%	.0%	38.1%
Average	39.8%	55.9%	57.8%	34.8%	28.1%	15.2%	.0%	.0%	40.9%

Table 29.C.21
Loans by HAL Status by Income of Borrower
 29. City of Youngstown
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Other	21	14	14	16	7	11	10	5	98
	HAL	16	17	18	11	5	1	0	0	68
	Percent HAL	43.2%	54.8%	56.3%	40.7%	41.7%	8.3%	.0%	.0%	41.0%
\$15,001–\$30,000	Other	132	84	75	89	61	60	54	38	593
	HAL	103	183	156	64	18	9	0	0	533
	Percent HAL	43.8%	68.5%	67.5%	41.8%	22.8%	13.0%	.0%	.0%	47.3%
\$30,001–\$45,000	Other	111	103	78	68	44	42	33	26	505
	HAL	66	80	94	37	19	7	0	0	303
	Percent HAL	37.3%	43.7%	54.7%	35.2%	30.2%	14.3%	.0%	.0%	37.5%
\$45,001–\$60,000	Other	57	39	34	39	20	18	17	19	243
	HAL	37	52	37	10	14	5	0	0	155
	Percent HAL	39.4%	57.1%	52.1%	20.4%	41.2%	21.7%	.0%	.0%	38.9%
\$60,001–\$75,000	Other	19	16	15	17	13	9	6	5	100
	HAL	8	10	9	7	3	4	0	0	41
	Percent HAL	29.6%	38.5%	37.5%	29.2%	18.8%	30.8%	.0%	.0%	29.1%
Above \$75,000	Other	25	18	17	16	5	5	6	5	97
	HAL	9	11	10	3	0	0	0	0	33
	Percent HAL	26.5%	37.9%	37.0%	15.8%	.0%	.0%	.0%	.0%	25.4%
Data Missing	Other	6	8	6	4	1	0	0	1	26
	HAL	6	5	4	1	0	0	0	0	16
	Percent HAL	50.0%	38.5%	40.0%	20.0%	.0%	%	%	.0%	38.1%
Total	Other	371	282	239	249	151	145	126	99	1,662
	HAL	245	358	328	133	59	26	0	0	1,149
	Percent HAL	39.8%	55.9%	57.8%	34.8%	28.1%	15.2%	.0%	.0%	40.9%

D. CRA DATA

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

Table 29.D.1
Small Business Loans Originated: \$100,000 or Less by Tract MFI
 29. City of Youngstown
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	413	296	252			961
2001	422	306	336			1,064
2002	422	330	356			1,108
2003	203	730	271			1,204
2004	188	700	232			1,120
2005	142	520	277			939
2006	216	714	310			1,240
2007	208	752	348			1,308
2008	155	532	223			910
2009	71	216	87			374
2010	78	200	70			348
2011	92	252	99			443
Total	2,610	5,548	2,861	0	0	11,019
Loan Amount (\$1,000s)						
2000	5,238	3,739	2,872			11,849
2001	4,354	3,444	2,915			10,713
2002	5,317	3,360	3,142			11,819
2003	2,532	7,433	2,196			12,161
2004	2,023	7,504	1,952			11,479
2005	1,622	5,933	2,304			9,859
2006	2,198	6,555	3,085			11,838
2007	2,072	7,140	2,927			12,139
2008	1,604	5,572	1,845			9,021
2009	1,275	3,406	786			5,467
2010	1,327	3,716	776			5,819
2011	1,636	4,394	995			7,025
Total	31,198	62,196	25,795	0	0	119,189

Table 29.D.2
Small Business Loans Originated: \$100,001 to \$250,000 by Tract MFI
 29. City of Youngstown
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	23	20	5			48
2001	20	15	3			38
2002	22	13	10			45
2003	5	23	4			32
2004	6	27	3			36
2005	6	38	6			50
2006	12	23	2			37
2007	7	23	4			34
2008	12	17	0			29
2009	14	26	1			41
2010	5	20	0			25
2011	12	21	3			36
Total	144	266	41	0	0	451
Loan Amount (\$1,000s)						
2000	3,860	2,929	644			7,433
2001	3,459	2,790	626			6,875
2002	3,571	2,047	1,710			7,328
2003	895	4,150	587			5,632
2004	1,113	4,630	515			6,258
2005	1,225	6,893	1,021			9,139
2006	2,252	4,337	323			6,912
2007	1,278	4,165	710			6,153
2008	2,115	3,154	0			5,269
2009	2,450	4,890	149			7,489
2010	1,068	3,719	0			4,787
2011	2,013	3,992	512			6,517
Total	25,299	47,696	6,797	0	0	79,792

Table 29.D.3
Small Business Loans Originated: More than \$250,000 by Tract MFI
 29. City of Youngstown
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	19	9	3			31
2001	28	11	4			43
2002	19	8	10			37
2003	12	22	6			40
2004	9	29	2			40
2005	6	28	2			36
2006	4	22	5			31
2007	5	23	6			34
2008	6	23	3			32
2009	7	21	5			33
2010	18	31	1			50
2011	10	30	5			45
Total	143	257	52	0	0	452
Loan Amount (\$1,000s)						
2000	11,193	3,295	1,474			15,962
2001	14,481	6,228	1,521			22,230
2002	9,517	5,267	4,628			19,412
2003	6,334	10,572	2,449			19,355
2004	4,844	14,682	1,500			21,026
2005	3,372	14,655	1,521			19,548
2006	2,173	12,412	2,750			17,335
2007	2,725	10,445	1,935			15,105
2008	3,850	12,120	1,121			17,091
2009	3,744	11,085	2,478			17,307
2010	8,801	16,208	645			25,654
2011	5,134	16,108	2,306			23,548
Total	76,168	133,077	24,328	0	0	233,573

Table 29.D.4
Small Business Loans to Businesses with Gross Annual Revenues of Less Than \$1 Million by Tract MFI
 29. City of Youngstown
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	111	98	101			310
2001	167	100	162			429
2002	92	72	86			250
2003	64	215	86			365
2004	54	192	65			311
2005	40	212	117			369
2006	58	243	119			420
2007	60	270	120			450
2008	29	153	69			251
2009	16	75	32			123
2010	22	90	28			140
2011	31	125	42			198
Total	744	1,845	1,027	0	0	3,616
Loan Amount (\$1,000s)						
2000	5,165	4,485	2,807			12,457
2001	5,484	3,501	3,061			12,046
2002	6,421	3,595	4,306			14,322
2003	5,603	9,109	2,454			17,166
2004	3,651	7,092	1,186			11,929
2005	1,081	7,534	1,859			10,474
2006	1,594	6,566	2,861			11,021
2007	1,224	5,753	1,605			8,582
2008	1,198	4,148	1,009			6,355
2009	446	2,988	1,064			4,498
2010	1,266	6,083	393			7,742
2011	2,590	4,514	1,735			8,839
Total	35,723	65,368	24,340	0	0	125,431

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 29.E.1
Fair Housing Complaints by Basis
29. City of Youngstown
2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color					1					1
Disability	3		1	4	2		2	2		14
Family Status			1				1			2
National Origin					1					1
Race	2	1	1	1	1	4	2	2	1	15
Religion			1		1			1		3
Sex				1						1
Total Bases	5	1	4	6	6	4	5	5	1	37
Total Complaints	4	1	3	6	4	4	5	4	1	32

Table 29.E.2
Fair Housing Complaints by Issue
29. City of Youngstown
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		1	2	2	1		7
Discriminatory refusal to rent		1		4		1				6
Failure to make reasonable accommodation	2		1	1	1		1			6
Discriminatory terms, conditions, privileges, or services and facilities	1		1			1		2		5
Discriminatory financing (includes real estate transactions)					1		1	1		3
Discriminatory advertising, statements, and notices							1	1		2
False denial or representation of availability	1						1			2
Otherwise deny or make housing available	1						1			2
Other discriminatory acts		1			1					2
Discriminatory refusal to sell									1	1
Discriminatory refusal to rent and 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
Discrimination in services and facilities relating to rental							1			1
Steering							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	7	1	3	6	5	4	11	6	3	46
Total Complaints	4	1	3	6	4	4	5	4	1	32

Table 29.E.3
Fair Housing Complaints by Closure Status
29. City of Youngstown
2004–2012 HUD Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
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Administrative Closure Cause (FHAP)		1	1		1	2	1		6
Conciliated / Settled	4		1	4	2	1	2		14
No Cause		1	1	1	2	2	1	2	10
Open								1	1
Total Complaints	4	1	3	6	4	4	5	4	32

HUD Complaints Found With Cause

Table 29.E.4
Fair Housing Complaints Found With Cause by Basis
29. City of Youngstown
2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color										
Disability	3		1	4	2		2			12
Race	2					1				3
Total Bases	5		1	4	2	1	2			15
Total Complaints	4		1	4	2	1	2	1		15

Table 29.E.5
Fair Housing Complaints Found With Cause by Issue
29. City of Youngstown
2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Failure to make reasonable accommodation	2		1	1	1		1			6
Discriminatory refusal to rent	1			2		1				4
Discrimination in terms, conditions or privileges relating to rental					1		1			2
False denial or representation of availability	1									1
Discriminatory financing (includes real estate transactions)								1		1
Discriminatory terms, conditions, privileges, or services and facilities	1									1
Discrimination in services and facilities relating to rental							1			1
Otherwise deny or make housing available	1									1
Failure to provide usable doors	1									1
Failure to permit reasonable modification				1						1
Total Issues	7	0	1	4	2	1	3	1	0	19
Total Complaints	4		1	4	2	1	2	1		15

OHIO CIVIL RIGHTS COMMISSION COMPLAINTS

Table 29.E.6
Fair Housing Complaints by Basis
 29. City of Youngstown
 2004–2012 OCRC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Age	1									1
Color				1		2				3
Disability	2		1	4	1	2	3	1		14
Family Status			1	1			1			3
Gender				3			1			4
National Origin										
Race	3		2	2	3	2	2	1		14
Religion	1			1	1			1		4
Retaliation				1	1					2
Other										
Total Bases	7	0	4	13	4	7	7	3	0	45
Total Complaints	4		4	9	2	5	7	2		33

Table 29.E.7
Fair Housing Complaints by Issue
 29. City of Youngstown
 2004–2012 OCRC Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Advertising				1						1
Intimidation				2	2	1				5
Maternity										
Other	2			3		1	2	1		9
Reasonable Accommodation			1				1			2
Terms and Conditions	2		4	8	1	4	5	1		25
Total Issues	4	0	5	14	3	6	8	2	0	42
Total Complaints	4		4	9	2	5	7	2		33

Table 29.E.8
Fair Housing Complaints by Closure Status
 29. City of Youngstown
 2004–2012 OCRC Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
CP Failed to Cooperate				2		1	2	1		6
CP Withdrawal – No Benefit				1			1			2
No Cause Finding Issued	2		2	2	1	3	1	1		12
Settlement With Benefits	1		1	3			2			7
Withdrawal With Benefits	1		1	1	1	1	1			6
Total Complaints	4	0	4	9	2	5	7	2	0	33

FAIR HOUSING CONTACT SERVICE COMPLAINTS

Table 29.E.9
Fair Housing Complaints by Basis
 29. City of Youngstown
 2004–2012 FHCS Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability					1					1
Familial Status					1					1
Race					1					1
Total Bases	0	0	0	0	3	0	0	0	0	3
Total Complaints					3					3

Table 29.E.10
Fair Housing Complaints by Closure Status
 29. City of Youngstown
 2004–2012 FHCS Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Inquiry						1				1
Lack of jurisdiction						2				2
Total Complaints	0	0	0	0	0	3	0	0	0	3

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 29.F.1
Primary Role of Respondent
 29. City of Youngstown
 2012–2013 Fair Housing Survey for Housing
 Stakeholders Data

Primary Role	Total
Advocate/Service Provider	5
Condo or Homeowner Association Leader	1
Construction/Development	2
Law/Legal Services	1
Local Government	2
Property Management	3
Real Estate	4
Other Role	2
Total	20

FEDERAL, STATE, AND LOCAL LAWS

Table 29.F.2
Familiarity with Fair Housing Laws

29. City of Youngstown
2012–2013 Fair Housing Survey
for Housing Stakeholders Data

Familiarity	Total
Not Familiar	2
Somewhat Familiar	7
Very Familiar	5
Missing	6
Total	20

Table 29.F.3
Perceptions About Fair Housing Laws

29. City of Youngstown
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?	15			5	20
Are fair housing laws difficult to understand or follow?	5	6	4	5	20
Do you think fair housing laws should be changed?	2	6	7	5	20
Do you think fair housing laws are adequately enforced?	8	6	1	5	20

Table 29.F.4
Fair Housing Activities

29. City of Youngstown
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?		8	6	1	5	20
Have you participated in fair housing training?		7	1		12	20
Are you aware of any fair housing testing?		4	6	5	5	20
Testing and education	Too Little	Right Amount	Too Much	Don't Know	Missing	Total
Is there sufficient outreach and education activity?	7	2		6	5	20
Is there sufficient testing?	1			14	5	20

Table 29.F.5
Protected Classes

29. City of Youngstown
2012–2013 Fair Housing Survey
for Housing Stakeholders Data

Protected Class	Total
Family Status	4
Religion	6
Gender	6
National Origin	2
Color	3
Sexual Orientation	2
Age	4
Military	2
Disability	1
Ancestry	2
Ethnicity	2
Total	34

Table 29.F.6
Fair Housing Violation Referrals
 29. City of Youngstown
 2012–2013 Fair Housing Survey for Housing
 Stakeholders Data

Referral	Total
County	1
HUD	1
Legal Aid	3
OCRC	2
Other	1
Youngstown Human Relations Commission	6
Total	14

LOCAL FAIR HOUSING

Table 29.F.7
Local Fair Housing
 29. City of Youngstown
 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?	5	7	2	6	20
Are there any specific geographic areas that have fair housing problems?	2	3	7	8	20
Are there any specific groups in that face housing discrimination?	7	2	5	6	20

FAIR HOUSING IN THE PRIVATE SECTOR

Table 29.F.8
Barriers to Fair Housing in the Private Sector
 29. City of Youngstown
 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	6	2	7	20
The real estate industry?	3	7	3	7	20
The mortgage and home lending industry?	5	4	4	7	20
The housing construction or accessible housing design fields?	1	5	7	7	20
The home insurance industry?	4	4	5	7	20
The home appraisal industry?	1	4	8	7	20
Any other housing services?		4	8	8	20

FAIR HOUSING IN THE PUBLIC SECTOR

Table 29.F.9

Barriers to Fair Housing in the Public Sector

29. City of Youngstown

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	6	4	6	20
Zoning laws?	5	6	3	6	20
Occupancy standards or health and safety codes?	1	5	7	7	20
Property tax policies?	2	5	7	6	20
Permitting process?		4	10	6	20
Housing construction standards?		5	9	6	20
Neighborhood or community development policies?	3	6	5	6	20
Limited access to government services, such as employment services?	5	6	3	6	20
Public administrative actions or regulations?		4	10	6	20

NARRATIVE COMMENTS

Federal, State, and Local Laws

Table 29.F.10

How did you become aware of fair housing laws?

29. City of Youngstown

2013 Fair Housing Survey Data

Comments:
Generally through my work. I am a housing advocate and present trainings on Fair Housing. In the past I was a landlord; also, I have been asked by a number of international students to intervene in tenant/landlord disputes. real estate classes, trainings, etc.. Real Estate Investors Assoc education Work on a housing services board.

Table 29.F.11

How should fair housing laws be changed?

29. City of Youngstown

2013 Fair Housing Survey Data

Comments:
Need to include sexual orientation Those reentering Income Think laws should be updated to reflect issues and concern relevant to a changing conditions.

Local Fair Housing

Table 29.F.12

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

29. City of Youngstown

2013 Fair Housing Survey Data

Comments:
north side The urban centers of Youngstown and Warren have too few safe and affordable housing options.

Table 29.F.13**Are there any specific groups in that face housing discrimination?**

29. City of Youngstown
2013 Fair Housing Survey Data

Comments:
<p>disabled 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 wit, 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.</p>

Table 29.F.14**Please share any additional comments.**

29. City of Youngstown
2013 Fair Housing Survey Data

Comments:
see box 3 above.

Fair Housing in the Private Sector**Table 29.F.15****Are you aware of any questionable practices or barriers to fair housing choice in the rental housing market?**

29. City of Youngstown
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. 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.</p>

Table 29.F.16**Are you aware of any questionable practices or barriers to fair housing choice in the real estate industry?**

29. City of Youngstown
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. Again race plays a part. I only "know" this anecdotally. See above answer in block number 1.</p>

Table 29.F.17**Are you aware of any questionable practices or barriers to fair housing choice in the mortgage and home lending industry?**

City of Youngstown
2013 Fair Ho29. City of Youngstown
using Survey Data

Comments:
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. see above story.

Table 29.F.18**Are you aware of any questionable practices or barriers to fair housing choice in the housing construction or accessible housing design fields?**

29. City of Youngstown
2013 Fair Housing Survey Data

Comments:
Handicapped acessibility is required by law.

Table 29.F.19**Are you aware of any questionable practices or barriers to fair housing choice in the home insurance industry?**

29. City of Youngstown
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 29.F.20**Are you aware of any questionable practices or barriers to fair housing choice in any other housing services?**

29. City of Youngstown
2013 Fair Housing Survey Data

Comments:
Crappy, unsafe, substandard rental units and rental houses for the poor.

Fair Housing in the Public Sector**Table 29.F.21****Are you aware of any questionable practices or barriers to fair housing choice in land use policies?**

29. City of Youngstown
2013 Fair Housing Survey Data

Comments:
big lot zoning, NIMBY concerning affordable housing Low-income housing is concentrated in areas bordering industrial sites. Youngstown is currently updating their zoning code but the current code limits these types of uses in specific zoned areas.

Table 29.F.22**Are you aware of any questionable practices or barriers to fair housing choice in zoning laws?**

29. City of Youngstown
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>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 29.F.23**Are you aware of any questionable practices or barriers to fair housing choice in occupancy standards or health and safety codes?**

29. City of Youngstown
2013 Fair Housing Survey Data

Comments:
<p>Codes have not been enforced in low-income neighborhoods for years. It is getting better.</p> <p>See box 2 above.</p>

Table 29.F.24**Are you aware of any questionable practices or barriers to fair housing choice in property tax policies?**

29. City of Youngstown
2013 Fair Housing Survey Data

Comments:
<p>City of Youngstown, especially around the YSU and Wick Park areas.</p>

Table 29.F.25**Are you aware of any questionable practices or barriers to fair housing choice in neighborhood or community development policies?**

29. City of Youngstown
2013 Fair Housing Survey Data

Comments:
<p>a great deal of money is devoted to projects in so called "targeted development".</p> <p>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 to sell.</p> <p>Low-income housing is not near to transportation or jobs creating a disparate impact on people of color and females.</p>

Table 29.F.26**Are you aware of any barriers that limit access to government services, such as a lack of transportation or employment services?**

29. City of Youngstown
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 options poor.</p> <p>Youngstown recently cut back on bus service due to budget cuts.</p>

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 29.G.1
Housing Development
 29. City of Youngstown
 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?	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?	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 Youngstown. 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 Youngstown.

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 in the City of Youngstown.*

Results of the Fair Housing Surveys indicate that the City does not have sufficient policies or practices to completely address the duty to affirmatively further fair housing.

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 City of Youngstown to deal with the scope and size of the fair housing problem. 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 City 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 the City 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 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. 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 in Youngstown. 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 29.H.1
Impediments Matrix
 29. City of Youngstown
 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	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

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.

30. REMAINDER OF MAHONING COUNTY

A. CENSUS BUREAU DATA

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

Table 30.A.1

Population by Age

30. Remainder of Mahoning County
2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Under 5	9,474	5.4%	8,489	4.9%	-10.4%
5 to 19	34,735	19.8%	31,712	18.5%	-8.7%
20 to 24	9,032	5.1%	8,705	5.1%	-3.6%
25 to 34	19,391	11.1%	17,362	10.1%	-10.5%
35 to 54	54,045	30.8%	47,882	27.9%	-11.4%
55 to 64	17,374	9.9%	25,525	14.9%	46.9%
65 or Older	31,420	17.9%	32,137	18.7%	2.3%
Total	175,471	100.0%	171,812	100.0%	-2.1%

Table 30.A.2

Elderly Population by Age

30. Remainder of Mahoning County
2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
65 to 66	2,910	9.3%	3,376	10.5%	16.0%
67 to 69	4,605	14.7%	5,170	16.1%	12.3%
70 to 74	8,165	26.0%	6,780	21.1%	-17.0%
75 to 79	7,353	23.4%	5,914	18.4%	-19.6%
80 to 84	4,910	15.6%	5,468	17.0%	11.4%
85 or Older	3,477	11.1%	5,429	16.9%	56.1%
Total	31,420	100.0%	32,137	100.0%	2.3%

Table 30.A.3

Population by Race and Ethnicity

30. Remainder of Mahoning County
2000 & 2010 Census SF1 Data

Race	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
White	166,945	95.1%	159,319	92.7%	-4.6%
Black	4,942	2.8%	7,169	4.2%	45.1%
American Indian	199	.1%	254	.1%	27.6%
Asian	952	.5%	1,384	.8%	45.4%
Native Hawaiian/ Pacific Islander	33	.0%	34	.0%	3.0%
Other	856	.5%	1,224	.7%	43.0%
Two or More Races	1,544	.9%	2,428	1.4%	57.3%
Total	175,471	100.0%	171,812	100.0%	-2.1%
Non-Hispanic	172,120	98.1	166,883	97.1%	-3.0%
Hispanic	3,351	1.9%	4,929	2.9%	47.1%

Table 30.A.4**Disability by Age**30. Remainder of Mahoning County
2010 Three-Year ACS Data

Age	Male		Female		Total	
	Disabled Population	Disability Rate	Disabled Population	Disability Rate	Disabled Population	Disability Rate
Under 5	94	1.4%	20	.3%	114	.9%
5 to 17	1,576	7.9%	1,518	7.9%	3,094	7.9%
18 to 34	1,911	8.7%	1,439	6.4%	3,350	7.6%
35 to 64	7,186	15.3%	7,316	14.6%	14,502	14.9%
65 to 74	1,865	21.5%	2,644	24.4%	4,509	23.1%
75 or Older	3,991	49.6%	5,945	44.7%	9,936	46.5%
Total	16,623	14.8%	18,882	15.4%	35,505	15.1%

Table 30.A.5**Employment Status by Disability and Type: Age 18 to 64**30. Remainder of Mahoning County
2010 Three-Year ACS Data

Disability Status	Population
Employed:	97,242
With a disability:	6,311
With a hearing difficulty	1,570
With a vision difficulty	1,086
With a cognitive difficulty	1,921
With an ambulatory difficulty	2,521
With a self-care difficulty	737
With an independent living difficulty	1,423
No disability	90,931
Unemployed:	12,748
With a disability:	1,917
With a hearing difficulty	432
With a vision difficulty	332
With a cognitive difficulty	983
With an ambulatory difficulty	819
With a self-care difficulty	257
With an independent living difficulty	559
No disability	10,831
Not in labor force:	31,644
With a disability:	9,624
With a hearing difficulty	1,197
With a vision difficulty	1,097
With a cognitive difficulty	5,050
With an ambulatory difficulty	6,145
With a self-care difficulty	2,159
With an independent living difficulty	4,245
No disability	22,020
Total	141,634

Table 30.A.6**Households by Income**

30. Remainder of Mahoning 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	9,730	13.8%	8,394	11.9%
\$15,000 to \$19,999	4,805	6.8%	4,204	6.0%
\$20,000 to \$24,999	5,498	7.8%	4,628	6.6%
\$25,000 to \$34,999	9,385	13.3%	8,458	12.0%
\$35,000 to \$49,999	12,433	17.7%	11,058	15.7%
\$50,000 to \$74,999	15,068	21.4%	14,596	20.7%
\$75,000 to \$99,999	7,068	10.0%	8,486	12.0%
\$100,000 or More	6,410	9.1%	10,638	15.1%
Total	70,397	100.0%	70,462	100.0%

Table 30.A.7**Poverty by Age**

30. Remainder of Mahoning 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	1,342	11.0%	2,270	12.8%
6 to 17	2,579	21.2%	3,182	17.9%
18 to 64	6,268	51.5%	9,822	55.4%
65 or Older	1,976	16.2%	2,465	13.9%
Total	12,165	100.0%	17,739	100.0%
Poverty Rate	7.0%	.	10.4%	.

Table 30.A.8**Households by Year Home Built**

30. Remainder of Mahoning 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	10,200	14.5%	8,904	12.6%
1940 to 1949	6,235	8.9%	4,929	7.0%
1950 to 1959	14,262	20.3%	13,929	19.8%
1960 to 1969	12,022	17.1%	10,488	14.9%
1970 to 1979	13,033	18.5%	12,372	17.6%
1980 to 1989	5,621	8.0%	6,036	8.6%
1990 to 1999	9,017	12.8%	8,693	12.3%
2000 to 2004	.	.	3,861	5.5%
2005 or Later	.	.	1,250	1.8%
Total	70,390	100.0%	70,462	100.0%

Table 30.A.9**Housing Units by Type**30. Remainder of Mahoning 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	58,802	78.8%	60,888	79.4%
Duplex	2,495	3.3%	2,396	3.1%
Tri- or Four-Plex	2,501	3.4%	2,853	3.7%
Apartment	8,904	11.9%	8,918	11.6%
Mobile Home	1,882	2.5%	1,659	2.2%
Boat, RV, Van, Etc.	0	.0%	0	.0%
Total	74,584	100.0%	76,714	100.0%

Table 30.A.10**Housing Units by Tenure**30. Remainder of Mahoning County
2000 & 2010 Census SF1 Data

Tenure	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
Occupied Housing Units	70,388	94.4%	71,856	91.3%	2.1%
Owner-Occupied	54,035	76.8%	54,038	75.2%	.0%
Renter-Occupied	16,353	23.2%	17,818	24.8%	9.0%
Vacant Housing Units	4,192	5.6%	6,830	8.7%	62.9%
Total Housing Units	74,580	100.0%	78,686	100.0%	5.5%

Table 30.A.11**Disposition of Vacant Housing Units**30. Remainder of Mahoning County
2000 & 2010 Census SF1 Data

Disposition	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
For Rent	1,489	35.5%	2,151	31.5%	44.5%
For Sale	938	22.4%	1,212	17.7%	29.2%
Rented or Sold, Not Occupied	688	16.4%	351	5.1%	-49.0%
For Seasonal, Recreational, or Occasional Use	543	13.0%	718	10.5%	32.2%
For Migrant Workers	2	0.0%	3	.0%	50.0%
Other Vacant	532	12.7%	2,395	35.1%	350.2%
Total	4,192	100.0%	6,830	100.0%	62.9%

Table 30.A.12**Households by Household Size**30. Remainder of Mahoning County
2000 & 2010 Census SF1 Data

Size	2000 Census		2010 Census		% Change 00-10
	Households	% of Total	Households	% of Total	
One Person	18,935	26.9%	21,207	29.5%	12.0%
Two Persons	24,221	34.4%	25,482	35.5%	5.2%
Three Persons	11,419	16.2%	11,107	15.5%	-2.7%
Four Persons	9,943	14.1%	8,633	12.0%	-13.2%
Five Persons	4,188	5.9%	3,688	5.1%	-11.9%
Six Persons	1,207	1.7%	1,222	1.7%	1.2%
Seven Persons or More	475	.7%	517	.7%	8.8%
Total	70,388	100.0%	71,856	100.0%	2.1%

Table 30.A.13

Household Type by Tenure
30. Remainder of Mahoning County
2000 & 2010 Census SF1 Data

Household Type	2000 Census		2010 Census		% Change 00–10
	Households	% of Total	Households	% of Total	
Family Households	49,124	69.8%	47,521	66.1%	-3.3%
Married-Couple Family	39,587	80.6%	36,260	76.3%	-8.4%
Owner-Occupied	35,734	90.3%	32,698	90.2%	-8.5%
Renter-Occupied	3,853	9.7%	3,562	9.8%	-7.6%
Other Family	9,537	19.4%	11,261	23.7%	18.1%
Male Householder, No Spouse	2,427	25.4%	3,092	27.5%	27.4%
Owner-Occupied	1,746	71.9%	2,130	68.9%	22.0%
Renter-Occupied	681	28.1%	962	31.1%	41.3%
Female Householder, No Spouse	7,110	74.6%	8,169	72.5%	14.9%
Owner-Occupied	4,522	63.6%	4,740	58.0%	4.8%
Renter-Occupied	2,588	36.4%	3,429	42.0%	32.5%
Non-Family Households	21,264	30.2%	24,335	33.9%	14.4%
Owner-Occupied	12,033	56.6%	14,470	59.5%	20.3%
Renter-Occupied	9,231	43.4%	9,865	40.5%	6.9%
Total	70,388	100.0%	71,856	100.0%	2.1%

Table 30.A.14

Group Quarters Population
30. Remainder of Mahoning 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	6	.3%	4	.2%	-33.3%
Juvenile Facilities	.	.	0	.0%	.
Nursing Homes	1,785	97.9%	1,729	98.4%	-3.1%
Other Institutions	32	1.8%	24	1.4%	-25.0%
Total	1,823	100.0%	1,757	100.0%	-3.6%
Noninstitutionalized					
College Dormitories	8	1.9%	38	11.3%	375.0%
Military Quarters	0	.0%	0	.0%	%
Other Noninstitutional	422	98.1%	299	88.7%	-29.1%
Total	430	19.1%	337	16.1%	-21.6%
Total Group Quarters Population	2,253	100.0%	2,094	100.0%	-7.1%

Table 30.A.15

Overcrowding and Severe Overcrowding
30. Remainder of Mahoning 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	53,680	99.3%	308	.6%	94	.2%	54,082
2010 ACS	53,867	99.5%	254	.5%	18	.0%	54,139
Renter							
2000 Census	15,895	97.5%	266	1.6%	147	.9%	16,308
2010 ACS	16,116	98.7%	117	.7%	90	.6%	16,323
Total							
2000 Census	69,575	98.8%	574	.8%	241	.3%	70,390
2010 ACS	69,983	99.3%	371	.5%	108	.2%	70,462

Table 30.A.16

Households with Incomplete Plumbing Facilities
 30. Remainder of Mahoning County
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Plumbing Facilities	70,116	70,244
Lacking Complete Plumbing Facilities	274	218
Total Households	70,390	70,462
Percent Lacking	.4%	.3%

Table 30.A.17

Households with Incomplete Kitchen Facilities
 30. Remainder of Mahoning County
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Kitchen Facilities	70,082	70,055
Lacking Complete Kitchen Facilities	308	407
Total Households	70,390	70,462
Percent Lacking	.4%	.6%

Table 30.A.18

Cost Burden and Severe Cost Burden by Tenure
 30. Remainder of Mahoning 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	23,033	76.4%	4,723	15.7%	2,250	7.5%	154	.5%	30,160
2010 ACS	23,715	68.5%	6,943	20.1%	3,916	11.3%	49	.1%	34,623
Owner Without a Mortgage									
2000 Census	15,921	89.5%	1,129	6.3%	567	3.2%	176	1.0%	17,793
2010 ACS	16,814	86.2%	1,523	7.8%	1,081	5.5%	98	.5%	19,516
Renter									
2000 Census	9,694	60.6%	2,874	18.0%	2,194	13.7%	1,228	7.7%	15,990
2010 ACS	7,672	47.0%	3,855	23.6%	3,406	20.9%	1,390	8.5%	16,323
Total									
2000 Census	48,648	76.1%	8,726	13.6%	5,011	7.8%	1,558	2.4%	63,943
2010 ACS	48,201	68.4%	12,321	17.5%	8,403	11.9%	1,537	2.2%	70,462

Table 30.A.19

Median Housing Costs
 30. Remainder of Mahoning County
 2000 Census SF3 & 2010 Five-Year ACS Data

Housing Cost	2000 Census	2010 ACS
Median Contract Rent	\$-299	\$70
Median Home Value	\$38,800	\$46,600

B. BLS DATA

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

Table 30.B.1
Labor Force Statistics
 30. Remainder of Mahoning County
 1990–2011 BLS Data

Year	Labor Force	Employment	Unemployment	Unemployment Rate	Statewide Unemployment Rate
1990	82,684	78,655	4,029	4.9%	5.7%
1991	82,231	78,321	3,910	4.8%	6.6%
1992	83,358	78,045	5,313	6.4%	7.4%
1993	82,949	78,085	4,864	5.9%	6.7%
1994	83,891	79,199	4,692	5.6%	5.6%
1995	84,291	80,563	3,728	4.4%	4.9%
1996	83,695	79,843	3,852	4.6%	5.0%
1997	84,010	80,431	3,579	4.3%	4.6%
1998	83,258	79,662	3,596	4.3%	4.3%
1999	82,122	78,995	3,127	3.8%	4.3%
2000	88,368	85,087	3,281	3.7%	4.0%
2001	86,750	83,108	3,642	4.2%	4.4%
2002	86,246	81,790	4,456	5.2%	5.7%
2003	87,671	81,721	5,950	6.8%	6.2%
2004	87,007	81,086	5,921	6.8%	6.1%
2005	87,367	81,884	5,483	6.3%	5.9%
2006	87,432	82,396	5,036	5.8%	5.4%
2007	86,742	81,822	4,920	5.7%	5.6%
2008	86,070	80,481	5,589	6.5%	6.5%
2009	86,587	76,395	10,192	11.8%	10.1%
2010	88,193	78,783	9,410	10.7%	10.0%
2011	86,939	79,217	7,722	8.9%	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.²² The information presented in this section presents detailed HMDA data, including denial rates and predatory lending including high annual percentage rate (APR) loans.

Table 30.C.1

Purpose of Loan by Year
30. Remainder of Mahoning County
2004–2011 HMDA Data

Purpose	2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	4,840	5,481	5,267	3,673	2,527	2,421	2,145	2,189	28,543
Home Improvement	1,308	1,490	1,338	1,388	836	560	472	426	7,818
Refinancing	10,165	9,782	8,788	6,351	4,665	6,060	5,461	4,660	55,932
Total	16,313	16,753	15,393	11,412	8,028	9,041	8,078	7,275	92,293

Table 30.C.2

Occupancy Status for Home Purchase Loan Applications
30. Remainder of Mahoning County
2004–2011 HMDA Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	Total
Owner-Occupied	4,425	5,013	4,840	3,349	2,320	2,296	2,025	2,050	26,318
Not Owner-Occupied	358	419	399	295	204	123	117	138	2,053
Not Applicable	57	49	28	29	3	2	3	1	172
Total	4,840	5,481	5,267	3,673	2,527	2,421	2,145	2,189	28,543

Table 30.C.3

Owner-Occupied Home Purchase Loan Applications by Loan Type
30. Remainder of Mahoning County
2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Conventional	3,924	4,619	4,538	3,008	1,442	1,098	1,039	998	20,666
FHA - Insured	399	295	245	282	744	1,041	855	900	4,761
VA - Guaranteed	93	90	53	50	112	89	101	99	687
Rural Housing Service or Farm Service Agency	9	9	4	9	22	68	30	53	204
Total	4,425	5,013	4,840	3,349	2,320	2,296	2,025	2,050	26,318

²² 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 30.C.4
Loan Applications by Action Taken
 30. Remainder of Mahoning County
 2004–2011 HMDA Data

Action	2004	2005	2006	2007	2008	2009	2010	2011	Total
Loan Originated	2,759	2,947	2,701	2,051	1,437	1,315	1,207	1,168	15,585
Application Approved but not Accepted	334	374	308	205	110	66	69	63	1,529
Application Denied	415	534	622	364	240	189	189	198	2,751
Application Withdrawn by Applicant	312	431	293	133	80	77	75	78	1,479
File Closed for Incompleteness	50	47	63	41	19	14	11	13	258
Loan Purchased by the Institution	555	674	853	554	434	635	474	530	4,709
Preapproval Request Denied	0	6	0	1	0	0	0	0	7
Preapproval Approved but not Accepted	0	0	0	0	0	0	0	0	0
Total	4,425	5,013	4,840	3,349	2,320	2,296	2,025	2,050	26,318
Denial Rate	13.1%	15.3%	18.7%	15.1%	14.3%	12.6%	13.5%	14.5%	15.0%

Table 30.C.5
Denial Rates by Gender of Applicant
 30. Remainder of Mahoning County
 2004–2011 HMDA Data

Year	Male	Female	Not Available	Not Applicable	Average
2004	10.7%	15.5%	52.3%	.0%	13.1%
2005	13.5%	18.3%	28.7%	100.0%	15.3%
2006	16.3%	23.8%	24.3%	.0%	18.7%
2007	12.5%	19.2%	27.6%	%	15.1%
2008	13.0%	16.8%	19.4%	.0%	14.3%
2009	12.4%	11.2%	25.0%	.0%	12.6%
2010	13.5%	12.3%	20.3%	%	13.5%
2011	13.2%	15.5%	21.9%	%	14.5%
Average	13.2%	17.5%	27.5%	20.0%	15.0%

Table 30.C.6
Loan Applications by Selected Action Taken by Gender of Applicant
 30. Remainder of Mahoning County
 2004–2011 HMDA Data

Gender		2004	2005	2006	2007	2008	2009	2010	2011	Total
Male	Originated	2,009	2,084	1,885	1,411	981	853	818	787	10,828
	Denied	240	326	366	202	146	121	128	120	1,649
	Denial Rate	10.7%	13.5%	16.3%	12.5%	13.0%	12.4%	13.5%	13.2%	13.2%
Female	Originated	708	786	700	569	397	413	334	299	4,206
	Denied	130	176	219	135	80	52	47	55	894
	Denial Rate	15.5%	18.3%	23.8%	19.2%	16.8%	11.2%	12.3%	15.5%	17.5%
Not Available	Originated	41	77	115	71	58	48	55	82	547
	Denied	45	31	37	27	14	16	14	23	207
	Denial Rate	52.3%	28.7%	24.3%	27.6%	19.4%	25.0%	20.3%	21.9%	27.5%
Not Applicable	Originated	1	0	1	0	1	1	0	0	4
	Denied	0	1	0	0	0	0	0	0	1
	Denial Rate	.0%	100.0%	.0%	%	.0%	.0%	%	%	20.0%
Total	Originated	2,759	2,947	2,701	2,051	1,437	1,315	1,207	1,168	15,585
	Denied	415	534	622	364	240	189	189	198	2,751
	Denial Rate	13.1%	15.3%	18.7%	15.1%	14.3%	12.6%	13.5%	14.5%	15.0%

Table 30.C.7
Denial Rates by Race/Ethnicity of Applicant
 30. Remainder of Mahoning County
 2004–2011 HMDA Data

Race/Ethnicity	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	33.3%	100.0%	.0%	33.3%	.0%	16.7%	.0%	.0%	21.2%
Asian	20.0%	11.5%	13.3%	32.0%	37.5%	13.6%	16.7%	38.5%	20.5%
Black	35.4%	32.1%	39.1%	29.5%	26.2%	12.0%	16.3%	33.3%	31.5%
White	10.4%	13.6%	17.0%	13.3%	13.2%	11.4%	12.4%	12.8%	13.2%
Not Available	38.4%	27.0%	28.9%	30.3%	24.5%	30.6%	26.0%	23.7%	29.1%
Not Applicable	50.0%	100.0%	.0%	%	.0%	0.0%	0%	%	37.5%
Average	13.1%	15.3%	18.7%	15.1%	14.3%	12.6%	13.5%	14.5%	15.0%
Non-Hispanic	11.3%	14.0%	17.5%	13.7%	13.5%	11.4%	12.3%	13.0%	13.7%
Hispanic	15.1%	28.6%	25.7%	27.3%	15.4%	10.7%	17.2%	34.6%	22.7%

Table 30.C.8
Loan Applications by Selected Action Taken by Race/Ethnicity of Applicant
 30. Remainder of Mahoning County
 2004–2011 HMDA Data

Race		2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Originated	4	0	2	4	3	5	4	4	26
	Denied	2	2	0	2	0	1	0	0	7
	Denial Rate	33.3%	100.0%	.0%	33.3%	.0%	.0%	.0%	.0%	21.2%
Asian	Originated	24	23	26	17	5	19	10	8	132
	Denied	6	3	4	8	3	3	2	5	34
	Denial Rate	20.0%	11.5%	13.3%	32.0%	37.5%	13.6%	16.7%	38.5%	20.5%
Black	Originated	64	95	81	55	31	22	36	20	404
	Denied	35	45	52	23	11	3	7	10	186
	Denial Rate	35.4%	32.1%	39.1%	29.5%	26.2%	12.0%	16.3%	33.3%	31.5%
White	Originated	2,548	2,645	2,416	1,876	1,323	1,209	1,080	1,036	14,133
	Denied	297	415	495	288	202	156	153	152	2,158
	Denial Rate	10.4%	13.6%	17.0%	13.3%	13.2%	11.4%	12.4%	12.8%	13.2%
Not Available	Originated	117	184	175	99	74	59	77	100	885
	Denied	73	68	71	43	24	26	27	31	363
	Denial Rate	38.4%	27.0%	28.9%	30.3%	24.5%	30.6%	26.0%	23.7%	29.1%
Not Applicable	Originated	2	0	1	0	1	1	0	0	5
	Denied	2	1	0	0	0	0	0	0	3
	Denial Rate	38.4%	27.0%	28.9%	30.3%	24.5%	30.6%	26.0%	23.7%	37.5%
Total	Originated	2,759	2,947	2,701	2,051	1,437	1,315	1,207	1,168	15,585
	Denied	415	534	622	364	240	189	189	198	2,751
	Denial Rate	13.1%	15.3%	18.7%	15.1%	14.3%	12.6%	13.5%	14.5%	15.0%
Non-Hispanic	Originated	2,367	2,699	2,479	1,913	1,337	1,226	1,109	1,055	14,185
	Denied	301	439	526	303	209	158	155	158	2,249
	Denial Rate	11.3%	14.0%	17.5%	13.7%	13.5%	11.4%	12.3%	13.0%	13.7%
Hispanic	Originated	45	50	52	40	33	25	24	17	286
	Denied	8	20	18	15	6	3	5	9	84
	Denial Rate	15.1%	28.6%	25.7%	27.3%	15.4%	10.7%	17.2%	34.6%	22.7%

Table 30.C.9
Loan Applications by Reason for Denial
 30. Remainder of Mahoning County
 2004–2011 HMDA Data

Denial Reason	2004	2005	2006	2007	2008	2009	2010	2011	Total
Debt-to-Income Ratio	38	51	75	42	27	38	36	49	356
Employment History	8	11	11	9	4	5	5	10	63
Credit History	94	91	83	60	55	41	51	45	520
Collateral	37	32	49	23	41	39	33	21	275
Insufficient Cash	3	8	7	11	10	1	8	5	53
Unverifiable Information	16	21	22	29	12	3	6	3	112
Credit Application Incomplete	28	29	39	47	40	24	22	37	266
Mortgage Insurance Denied	1	0	2	1	2	1	3	0	10
Other	89	172	122	27	13	13	12	7	455
Missing	101	119	212	115	36	24	13	21	641
Total	415	534	622	364	240	189	189	198	2,751

Table 30.C.10
Denial Rates by Income of Applicant
 30. Remainder of Mahoning County
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	38.0%	44.8%	42.9%	46.7%	30.0%	30.4%	54.5%	61.9%	43.5%
\$15,001–\$30,000	21.2%	22.1%	29.2%	27.4%	19.8%	18.5%	12.3%	16.3%	22.4%
\$30,001–\$45,000	13.9%	15.4%	21.0%	16.4%	13.1%	11.2%	11.8%	17.3%	15.7%
\$45,001–\$60,000	10.6%	15.0%	19.6%	13.5%	19.5%	11.0%	14.8%	13.0%	14.7%
\$60,001–\$75,000	10.1%	14.0%	9.9%	8.2%	13.1%	11.9%	14.5%	14.3%	11.7%
Above \$75,000	6.5%	9.6%	11.6%	8.5%	8.3%	10.0%	9.6%	8.6%	9.1%
Data Missing	24.8%	22.1%	13.6%	21.6%	6.7%	13.6%	24.2%	38.9%	21.0%
Total	13.1%	15.3%	18.7%	15.1%	14.3%	12.6%	13.5%	14.5%	15.0%

Table 30.C.11
Denial Rates of Loans by Race/Ethnicity and Income of Applicant
 30. Remainder of Mahoning County
 2004–2011 HMDA Data

Race	<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	Above \$75K	Data Missing	Average
American Indian	.0%	12.5%	42.9%	.0%	66.7%	10.0%	.	21.2%
Asian	100.0%	37.9%	33.3%	14.8%	9.5%	10.0%	.0%	20.5%
Black	69.2%	42.2%	23.8%	30.7%	34.4%	22.4%	25.0%	31.5%
White	40.9%	20.1%	13.8%	13.2%	9.8%	8.2%	17.2%	13.2%
Not Available	48.4%	37.6%	35.7%	25.4%	21.9%	17.6%	54.8%	29.1%
Not Applicable	100.0%	%	.0%	100.0%	100.0%	.0%	.0%	37.5%
Average	43.5%	22.4%	15.7%	14.7%	11.7%	9.1%	21.0%	15.0%
Non-Hispanic Ethnicity	41.7%	20.6%	14.1%	13.8%	11.0%	8.4%	16.6%	13.7%
Hispanic (Ethnicity)	45.5%	31.4%	21.5%	25.8%	10.5%	6.7%	18.8%	22.7%

Table 30.C.12
Loan Applications by Reason for Denial by Race/Ethnicity of Applicant
 30. Remainder of Mahoning County
 2004–2011 HMDA Data

Denial Reason	American Indian	Asian	Black	White	Not Available	Not Applicable	Total	Hispanic (Ethnicity)
Debt-to-Income Ratio	0	7	14	299	35	1	356	15
Employment History	0	1	3	53	6	0	63	1
Credit History	1	7	45	398	69	0	520	22
Collateral	0	3	13	231	27	1	275	9
Insufficient Cash	0	0	3	42	8	0	53	2
Unverifiable Information	0	1	18	79	14	0	112	6
Credit Application Incomplete	1	6	11	212	35	1	266	0
Mortgage Insurance Denied	0	0	0	10	0	0	10	1
Other	2	2	41	360	50	0	455	16
Missing	3	7	38	474	119	0	641	12
Total	7	34	186	2,158	363	3	2,751	84
% Missing	42.9%	20.6%	20.4%	22.0%	32.8%	.0%	23.3%	14.3%

Table 30.C.13
Loan Applications by Income of Applicant: Originated and Denied
 30. Remainder of Mahoning County
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Loan Originated	31	16	28	16	14	16	15	8	144
	Application Denied	19	13	21	14	6	7	18	13	111
	Denial Rate	38.0%	44.8%	42.9%	46.7%	30.0%	30.4%	54.5%	61.9%	43.5%
\$15,001–\$30,000	Loan Originated	405	434	384	270	198	216	178	159	2,244
	Application Denied	109	123	158	102	49	49	25	31	646
	Denial Rate	21.2%	22.1%	29.2%	27.4%	19.8%	18.5%	12.3%	16.3%	22.4%
\$30,001–\$45,000	Loan Originated	638	710	664	510	372	317	261	258	3,730
	Application Denied	103	129	177	100	56	40	35	54	694
	Denial Rate	13.9%	15.4%	21.0%	16.4%	13.1%	11.2%	11.8%	17.3%	15.7%
\$45,001–\$60,000	Loan Originated	585	645	516	437	269	251	242	241	3,186
	Application Denied	69	114	126	68	65	31	42	36	551
	Denial Rate	10.6%	15.0%	19.6%	13.5%	19.5%	11.0%	14.8%	13.0%	14.7%
\$60,001–\$75,000	Loan Originated	383	404	363	259	185	163	148	150	2,055
	Application Denied	43	66	40	23	28	22	25	25	272
	Denial Rate	10.1%	14.0%	9.9%	8.2%	13.1%	11.9%	14.5%	14.3%	11.7%
Above \$75,000	Loan Originated	632	678	676	530	385	333	338	341	3,913
	Application Denied	44	72	89	49	35	37	36	32	394
	Denial Rate	6.5%	9.6%	11.6%	8.5%	8.3%	10.0%	9.6%	8.6%	9.1%
Data Missing	Loan Originated	85	60	70	29	14	19	25	11	313
	Application Denied	28	17	11	8	1	3	8	7	83
	Denial Rate	24.8%	22.1%	13.6%	21.6%	6.7%	13.6%	24.2%	38.9%	21.0%
Total	Loan Originated	2,759	2,947	2,701	2,051	1,437	1,315	1,207	1,168	15,585
	Application Denied	415	534	622	364	240	189	189	198	2,751
	Denial Rate	13.1%	15.3%	18.7%	15.1%	14.3%	12.6%	13.5%	14.5%	15.0%

Table 30.C.14
Loan Applications by Income and Race/Ethnicity of Applicant: Originated and Denied
 30. Remainder of Mahoning County
 2004–2011 HMDA Data

Race		<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	> \$75K	Data Missing	Total
American Indian	Loan Originated	1	7	4	4	1	9	0	26
	Application Denied	0	1	3	0	2	1	0	7
	Denial Rate	.0%	12.5%	42.9%	.0%	66.7%	10.0%	%	21.2%
Asian	Loan Originated	0	18	22	23	19	45	5	132
	Application Denied	1	11	11	4	2	5	0	34
	Denial Rate	100.0%	37.9%	33.3%	14.8%	9.5%	10.0%	.0%	20.5%
Black	Loan Originated	4	67	96	97	61	76	3	404
	Application Denied	9	49	30	43	32	22	1	186
	Denial Rate	69.2%	42.2%	23.8%	30.7%	34.4%	22.4%	25.0%	31.5%
White	Loan Originated	123	2,026	3,424	2,868	1,860	3,547	285	14,133
	Application Denied	85	509	549	437	203	316	59	2,158
	Denial Rate	40.9%	20.1%	13.8%	13.2%	9.8%	8.2%	17.2%	13.2%
Not Available	Loan Originated	16	126	182	194	114	234	19	885
	Application Denied	15	76	101	66	32	50	23	363
	Denial Rate	48.4%	37.6%	35.7%	25.4%	21.9%	17.6%	54.8%	29.1%
Not Applicable	Loan Originated	0	0	2	0	0	2	1	5
	Application Denied	1	0	0	1	1	0	0	3
	Denial Rate	100.0%	%	.0%	100.0%	100.0%	.0%	.0%	37.5%
Total	Loan Originated	144	2,244	3,730	3,186	2,055	3,913	313	15,585
	Application Denied	111	646	694	551	272	394	83	2,751
	Denial Rate	43.5%	22.4%	15.7%	14.7%	11.7%	9.1%	21.0%	15.0%
Non-Hispanic Ethnicity	Loan Originated	120	2,013	3,429	2,901	1,868	3,578	276	14,185
	Application Denied	86	523	561	465	230	329	55	2,249
	Denial Rate	41.7%	20.6%	14.1%	13.8%	11.0%	8.4%	16.6%	13.7%
Hispanic (Ethnicity)	Loan Originated	6	72	73	46	34	42	13	286
	Application Denied	5	33	20	16	4	3	3	84
	Denial Rate	45.5%	31.4%	21.5%	25.8%	10.5%	6.7%	18.8%	22.7%

PREDATORY LENDING

Table 30.C.15
Originated Owner-Occupied Loans by HAL Status
 30. Remainder of Mahoning County
 2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Other	2,388	2,242	2,059	1,771	1,259	1,226	1,202	1,165	13,312
HAL	371	705	642	280	178	89	5	3	2,273
Total	2,759	2,947	2,701	2,051	1,437	1,315	1,207	1,168	15,585
Percent HAL	13.4%	23.9%	23.8%	13.7%	12.4%	6.8%	.4%	.3%	14.6%

Table 30.C.16
Loans by Loan Purpose by HAL Status
 30. Remainder of Mahoning County
 2004–2011 HMDA Data

Loan Purpose		2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	Other	2,388	2,242	2,059	1,771	1,259	1,226	1,202	1,165	13,312
	HAL	371	705	642	280	178	89	5	3	2,273
	Percent HAL	13.4%	23.9%	23.8%	13.7%	12.4%	6.8%	.4%	.3%	14.6%
Home Improvement	Other	381	397	447	488	296	234	221	227	2,691
	HAL	101	128	109	96	68	44	11	8	565
	Percent HAL	21.0%	24.4%	19.6%	16.4%	18.7%	15.8%	4.7%	3.4%	17.4%
Refinancing	Other	2,950	2,190	1,911	1,573	1,392	2,692	2,664	2,204	17,576
	HAL	692	918	842	443	307	225	16	15	3,458
	Percent HAL	19.0%	29.5%	30.6%	22.0%	18.1%	7.7%	.6%	.7%	16.4%
Total	Other	5,719	4,829	4,417	3,832	2,947	4,152	4,087	3,596	33,579
	HAL	1,164	1,751	1,593	819	178	89	5	3	6,296
	Percent HAL	16.9%	26.6%	26.5%	17.6%	15.8%	7.9%	.8%	.7%	15.8%

Table 30.C.17
HALs Originated by Race of Borrower
 30. Remainder of Mahoning County
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	0	0	0	1	1	1	0	0	3
Asian	2	10	5	0	0	0	0	0	17
Black	19	55	50	17	4	1	0	0	146
White	309	558	522	242	160	84	5	3	1,883
Not Available	41	82	65	20	13	2	0	0	223
Not Applicable	0	0	0	0	0	1	0	0	1
Total	371	705	642	280	178	89	5	3	2,273
Hispanic (Ethnicity)	5	14	13	7	5	4	0	0	48

Table 30.C.18
Rate of HALs Originated by Race/Ethnicity of Borrower
 30. Remainder of Mahoning County
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	.0%	%	.0%	25.0%	33.3%	20.0%	.0%	.0%	11.5%
Asian	8.3%	43.5%	19.2%	.0%	.0%	.0%	.0%	.0%	12.9%
Black	29.7%	57.9%	61.7%	30.9%	12.9%	4.5%	.0%	.0%	36.1%
White	12.1%	21.1%	21.6%	12.9%	12.1%	6.9%	.5%	.3%	13.3%
Not Available	35.0%	44.6%	37.1%	20.2%	17.6%	3.4%	.0%	.0%	25.2%
Not Applicable	.0%	%	.0%	%	.0%	100.0%	%	%	20%
Average	13.4%	23.9%	23.8%	13.7%	12.4%	6.8%	0.4%	0.3%	14.6%
Non-Hispanic Ethnicity	12.9%	22.4%	22.9%	13.2%	12.1%	6.8%	.5%	.3%	14.0%
Hispanic (Ethnicity)	11.1%	28.0%	25.0%	17.5%	15.2%	16.0%	.0%	.0%	16.8%

Table 30.C.19
Loans by HAL Status by Race/Ethnicity of Borrower
 30. Remainder of Mahoning County
 2004–2011 HMDA Data

Race	Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Other	4	0	2	3	2	4	4	4	23
	HAL	0	0	0	1	1	1	0	0	3
	Percent HAL	.0%	%	.0%	25.0%	33.3%	20.0%	.0%	.0%	11.5%
Asian	Other	22	13	21	17	5	19	10	8	115
	HAL	2	10	5	0	0	0	0	0	17
	Percent HAL	8.3%	43.5%	19.2%	.0%	.0%	.0%	.0%	.0%	12.9%
Black	Other	45	40	31	38	27	21	36	20	258
	HAL	19	55	50	17	4	1	0	0	146
	Percent HAL	29.7%	57.9%	61.7%	30.9%	12.9%	4.5%	.0%	.0%	36.1%
White	Other	2,239	2,087	1,894	1,634	1,163	1,125	1,075	1,033	12,250
	HAL	309	558	522	242	160	84	5	3	1,883
	Percent HAL	12.1%	21.1%	21.6%	12.9%	12.1%	6.9%	0.5%	0.3%	13.3%
Not Available	Other	76	102	110	79	61	57	77	100	662
	HAL	41	82	65	20	13	2	0	0	223
	Percent HAL	35.0%	44.6%	37.1%	20.2%	17.6%	3.4%	.0%	.0%	25.2%
Not Applicable	Other	2	0	1	0	1	0	0	0	4
	HAL	0	0	0	0	0	1	0	0	1
	Percent HAL	.0%	%	.0%	%	.0%	100.0%	%	%	20.0%
Total	Other	2,388	2,242	2,059	1,771	1,259	1,226	1,202	1,165	13,312
	HAL	371	705	642	280	178	89	5	3	2,273
	Percent HAL	13.4%	23.9%	23.8%	13.7%	12.4%	6.8%	.4%	.3%	14.6%
Non-Hispanic Ethnicity	Other	2,061	2,094	1,912	1,660	1,175	1,143	1,104	1,052	12,201
	HAL	306	605	567	253	162	83	5	3	1,984
	Percent HAL	12.9%	22.4%	22.9%	13.2%	12.1%	6.8%	.5%	.3%	14.0%
Hispanic (Ethnicity)	Other	40	36	39	33	28	21	24	17	238
	HAL	5	14	13	7	5	4	0	0	48
	Percent HAL	11.1%	28.0%	25.0%	17.5%	15.2%	16.0%	.0%	.0%	16.8%

Table 30.C.20
Rates of HALs by Income of Borrower
 30. Remainder of Mahoning County
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Average
\$15,000 or Below	12.9%	31.3%	25.0%	43.8%	28.6%	12.5%	.0%	.0%	20.1%
\$15,001–\$30,000	20.7%	34.3%	38.5%	18.9%	20.2%	10.6%	1.7%	.6%	22.2%
\$30,001–\$45,000	16.8%	32.0%	26.7%	16.9%	17.5%	8.8%	.4%	.0%	18.5%
\$45,001–\$60,000	16.1%	23.3%	24.2%	12.8%	10.4%	5.2%	.4%	.0%	14.7%
\$60,001–\$75,000	9.1%	18.8%	20.1%	10.8%	8.6%	4.3%	.0%	.0%	11.4%
Above \$75,000	6.3%	12.4%	13.3%	8.1%	6.5%	4.8%	0.0%	.6%	7.7%
Data Missing	8.2%	23.3%	31.4%	31.0%	.0%	.0%	.0%	.0%	16.6%
Average	13.4%	23.9%	23.8%	13.7%	12.4%	6.8%	.4%	.3%	14.6%

Table 30.C.21
Loans by HAL Status by Income of Borrower
 30. Remainder of Mahoning County
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Other	27	11	21	9	10	14	15	8	115
	HAL	4	5	7	7	4	2	0	0	29
	Percent HAL	12.9%	31.3%	25.0%	43.8%	28.6%	12.5%	.0%	.0%	20.1%
\$15,001–\$30,000	Other	321	285	236	219	158	193	175	158	1,745
	HAL	84	149	148	51	40	23	3	1	499
	Percent HAL	20.7%	34.3%	38.5%	18.9%	20.2%	10.6%	1.7%	.6%	22.2%
\$30,001–\$45,000	Other	531	483	487	424	307	289	260	258	3,039
	HAL	107	227	177	86	65	28	1	0	691
	Percent HAL	16.8%	32.0%	26.7%	16.9%	17.5%	8.8%	.4%	.0%	18.5%
\$45,001–\$60,000	Other	491	495	391	381	241	238	241	241	2,719
	HAL	94	150	125	56	28	13	1	0	467
	Percent HAL	16.1%	23.3%	24.2%	12.8%	10.4%	5.2%	.4%	.0%	14.7%
\$60,001–\$75,000	Other	348	328	290	231	169	156	148	150	1,820
	HAL	35	76	73	28	16	7	0	0	235
	Percent HAL	9.1%	18.8%	20.1%	10.8%	8.6%	4.3%	.0%	.0%	11.4%
Above \$75,000	Other	592	594	586	487	360	317	338	339	3,613
	HAL	40	84	90	43	25	16	0	2	300
	Percent HAL	6.3%	12.4%	13.3%	8.1%	6.5%	4.8%	.0%	.6%	7.7%
Data Missing	Other	78	46	48	20	14	19	25	11	261
	HAL	7	14	22	9	0	0	0	0	52
	Percent HAL	8.2%	23.3%	31.4%	31.0%	.0%	.0%	.0%	.0%	16.6%
Total	Other	2,388	2,242	2,059	1,771	1,259	1,226	1,202	1,165	13,312
	HAL	371	705	642	280	178	89	5	3	2,273
	Percent HAL	13.4%	23.9%	23.8%	13.7%	12.4%	6.8%	.4%	.3%	14.6%

D. CRA DATA

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

Table 30.D.1
Small Business Loans Originated: \$100,000 or Less by Tract MFI
 30. Remainder of Mahoning 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	2	140	1,304	1,637		3,083
2001	5	120	1,358	1,705		3,188
2002	2	130	1,641	1,883		3,656
2003	19	175	1,978	2,199		4,371
2004	12	146	2,051	2,015		4,224
2005	21	163	2,123	2,073		4,380
2006	25	174	2,603	2,782		5,584
2007	32	204	2,850	3,025		6,111
2008	17	139	2,026	2,305		4,487
2009	10	40	798	1,029		1,877
2010	8	58	812	1,001		1,879
2011	13	59	1,030	1,193		2,295
Total	166	1,548	20,574	22,847	0	45,135
Loan Amount (\$1,000s)						
2000	51	1,498	19,236	22,939		43,724
2001	63	1,318	16,629	22,031		40,041
2002	55	1,298	18,112	23,019		42,484
2003	201	1,436	19,532	21,955		43,124
2004	72	1,665	21,632	20,771		44,140
2005	379	1,431	24,369	25,112		51,291
2006	332	2,105	29,030	27,682		59,149
2007	277	1,863	29,477	32,361		63,978
2008	112	1,078	18,238	22,728		42,156
2009	92	667	10,933	13,744		25,436
2010	153	1,056	15,503	17,802		34,514
2011	137	647	17,261	20,347		38,392
Total	1,924	16,062	239,952	270,491	0	528,429

Table 30.D.2
Small Business Loans Originated: \$100,001 to \$250,000 by Tract MFI
 30. Remainder of Mahoning 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	3	58	90		151
2001	0	0	73	104		177
2002	0	7	65	134		206
2003	0	6	83	111		200
2004	0	3	78	101		182
2005	0	6	69	115		190
2006	1	2	74	86		163
2007	0	10	81	99		190
2008	0	4	36	69		109
2009	0	5	62	57		124
2010	0	7	48	67		122
2011	3	9	80	92		184
Total	4	62	807	1,125	0	1,998
Loan Amount (\$1,000s)						
2000	0	485	10,449	15,737		26,671
2001	0	0	12,249	19,333		31,582
2002	0	1,353	11,082	23,246		35,681
2003	0	919	13,921	19,648		34,488
2004	0	548	13,905	17,727		32,180
2005	0	1,028	12,177	20,028		33,233
2006	150	350	12,968	14,939		28,407
2007	0	1,675	13,750	17,228		32,653
2008	0	585	6,698	11,789		19,072
2009	0	810	11,078	9,636		21,524
2010	0	1,282	8,347	12,171		21,800
2011	605	1,723	13,762	16,314		32,404
Total	755	10,758	140,386	197,796	0	349,695

Table 30.D.3
Small Business Loans Originated: More than \$250,000 by Tract MFI
 30. Remainder of Mahoning 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	4	57	87		148
2001	0	3	57	118		178
2002	0	4	56	140		200
2003	0	6	60	88		154
2004	0	8	87	95		190
2005	1	8	52	87		148
2006	0	11	52	91		154
2007	0	11	49	99		159
2008	0	7	41	79		127
2009	0	10	58	81		149
2010	2	5	61	92		160
2011	0	10	66	84		160
Total	3	87	696	1,141	0	1,927
Loan Amount (\$1,000s)						
2000	0	1,476	27,466	43,862		72,804
2001	0	1,600	27,066	61,409		90,075
2002	0	1,610	26,365	72,265		100,240
2003	0	4,584	30,850	44,914		80,348
2004	0	4,579	43,569	51,762		99,910
2005	747	4,337	26,698	45,033		76,815
2006	0	6,108	26,775	45,189		78,072
2007	0	6,137	24,971	48,039		79,147
2008	0	3,170	21,314	37,402		61,886
2009	0	5,834	28,300	41,791		75,925
2010	1,046	3,000	31,893	43,524		79,463
2011	0	5,710	33,024	42,502		81,236
Total	1,793	48,145	348,291	577,692	0	975,921

Table 30.D.4
Small Business Loans to Businesses with Gross Annual Revenues of Less Than \$1 Million by Tract MFI
 30. Remainder of Mahoning 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	59	557	702		1,319
2001	3	45	579	815		1,442
2002	1	41	470	660		1,172
2003	9	57	691	811		1,568
2004	8	46	636	713		1,403
2005	9	73	952	993		2,027
2006	7	61	1,012	1,050		2,130
2007	8	58	1,054	1,136		2,256
2008	7	39	669	744		1,459
2009	2	17	319	368		706
2010	3	27	356	420		806
2011	3	33	510	611		1,157
Total	61	556	7,805	9,023	0	17,445
Loan Amount (\$1,000s)						
2000	50	1,055	25,905	34,655		61,665
2001	60	1,194	26,044	51,230		78,528
2002	50	3,150	31,598	54,512		89,310
2003	117	1,451	32,596	38,351		72,515
2004	38	1,856	28,990	44,017		74,901
2005	932	1,534	27,902	41,439		71,807
2006	193	3,227	30,506	45,335		79,261
2007	86	2,815	25,351	39,973		68,225
2008	44	452	13,357	27,987		41,840
2009	23	991	14,000	26,056		41,070
2010	121	985	15,338	22,508		38,952
2011	73	615	17,905	27,466		46,059
Total	1,787	19,325	289,492	453,529	0	764,133

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 30.E.1
Fair Housing Complaints by Basis
30. Remainder of Mahoning County
2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color					1					1
Disability	2		2	3	1	1	0	1	2	12
Family Status	1	2	2	1		1	0	1	2	10
National Origin					0				1	1
Race	1	0	0	3	1	0	1	0	3	9
Religion	1		0		0			0	1	2
Sex				1						1
Total Bases	5	2	4	8	3	2	1	2	9	36
Total Complaints	4	2	4	8	2	2	1	2	5	30

Table 30.E.2
Fair Housing Complaints by Issue
30. Remainder of Mahoning 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	2	0	1	0	1	1	0	8
Discriminatory advertisement - rental				2		1	1		1	5
Discriminatory terms, conditions, privileges, or services and facilities	0		1	1	1	0		0	2	5
Discriminatory refusal to rent	0			2		0			2	4
Failure to make reasonable accommodation	1		2	0	0		0	1		4
Discriminatory refusal to rent and negotiate for rental				2			0		1	3
Discriminatory acts under Section 818 (coercion, etc.)			1	1				0	1	3
False denial or representation of availability - rental					1				1	2
Other discriminatory acts		0			0			1	1	2
Discriminatory refusal to sell				1					0	1
Discriminatory advertising, statements, and notices							0	0	1	1
Otherwise deny or make housing available	0						0		1	1
Total Issues	4	2	6	8	3	2	1	3	10	39
Total Complaints	4	2	4	8	2	2	1	2	5	30

Table 30.E.3
Fair Housing Complaints by Closure Status
 30. Remainder of Mahoning County
 2004–2012 HUD Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Administrative Closure Cause (FHAP)		1	0	2		2	1	0	1	7
Conciliated / Settled	1	1	2	4	1	0	0	1		10
No Cause	3	0	1	2	1	0	0	0	1	8
Open									3	3
Total Complaints	4	2	4	8	2	2	1	2	5	30

HUD Complaints Found With Cause

Table 30.E.4
Fair Housing Complaints Found With Cause by Basis
 30. Remainder of Mahoning County
 2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability	1		1	1	1		0	1		5
Family Status		1	2	1				1		5
Race	0			1		0				1
Sex				1						1
Total Bases	1	1	3	4	1	0	0	2		12
Total Complaints	1	1	3	4	1	0	0	2		12

Table 30.E.5
Fair Housing Complaints Found With Cause by Issue
 30. Remainder of Mahoning County
 2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Discriminatory advertisement - rental					2			1		3
Discriminatory terms, conditions, privileges, or services and facilities			0		1	1	1			3
Failure to make reasonable accommodation			1		1	0	0	0	1	3
Discrimination in terms, conditions or privileges relating to rental				1		1	0	0		2
Discriminatory refusal to sell						1				1
Discriminatory refusal to rent			0			1		0		1
Other discriminatory acts								1		1
Discriminatory acts under Section 818 (coercion, etc.)					1					1
Total Issues	1	1	5	4	1	0	0	3	0	15
Total Complaints	1	1	3	4	1	0	0	2		12

OHIO CIVIL RIGHTS COMMISSION COMPLAINTS

Table 30.E.6**Fair Housing Complaints by Basis**

30. Remainder of Mahoning County

2004–2012 OCRC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color				0		1				1
Disability	2		2	2	0	0	0	1	1	8
Family Status			2	1			0			3
Gender			1	0		1	0			2
Race	1		0	2	2	0	0	0	2	8
Retaliation				1	0			1	1	3
Total Bases	3	0	5	6	1	4	0	2	4	25
Total Complaints	3		3	6	1	2	0	1	3	19

Table 30.E.7**Fair Housing Complaints by Issue**

30. Remainder of Mahoning County

2004–2012 OCRC Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Advertising			1	0						1
Discharge				1						1
Harassment			1	1						2
Intimidation				0	0	0			2	2
Other	1			2		0	0	1	1	5
Reasonable Accommodation	2		0				0			2
Terms and Conditions	0		3	3	1	2	0	0	2	11
Total Issues	3	0	5	7	1	2	0	1	5	24
Total Complaints	3		3	6	1	2	0	1	3	19

Table 30.E.8**Fair Housing Complaints by Closure Status**

30. Remainder of Mahoning County

2004–2012 OCRC Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
CP Failed to Cooperate				1		0	0	0		1
CP Withdrawal – No Benefit				0			0		1	1
No Cause Finding Issued	1		2	2	1	2	0	0	1	9
No Jurisdiction									1	1
Settlement With Benefits	2		0	2			0			4
Successful Conciliation			1							1
Withdrawal With Benefits	0		0	1	0	0	0	1		2
Total Complaints	3	0	3	6	1	2	0	1	3	19

FAIR HOUSING CONTACT SERVICE COMPLAINTS

Table 30.E.9
Fair Housing Complaints by Basis
 30. Remainder of Mahoning County
 2004–2012 FHCS Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability				1	1					2
Familial Status					1			1		2
Total Bases	0	0	0	1	2	0	0	1	0	4
Total Complaints				1	2			1		4

Table 30.E.10
Fair Housing Complaints by Closure Status
 30. Remainder of Mahoning County
 2004–2012 FHCS Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Lack of jurisdiction					1					1
No probable cause				1						1
Probable cause								1		1
Withdrawal of Charge					1					1
Total Complaints	0	0	0	1	2	0	0	1	0	4

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 30.F.1
Primary Role of Respondent
 30. Remainder of Mahoning County
 2012–2013 Fair Housing Survey for Housing
 Stakeholders Data

Primary Role	Total
Real Estate	1
Other Role	1
Total	2

FEDERAL, STATE, AND LOCAL LAWS

Table 30.F.2
**Familiarity with Fair
 Housing Laws**

30. Remainder of Mahoning
 County
 2012–2013 Fair Housing Survey
 for Housing Stakeholders Data

Familiarity	Total
Not Familiar	0
Somewhat Familiar	0
Very Familiar	2
Missing	0
Total	2

Table 30.F.3
Perceptions About Fair Housing Laws

30. Remainder of Mahoning 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?	2			0	2
Are fair housing laws difficult to understand or follow?	0	2	0	0	2
Do you think fair housing laws should be changed?	0	1	1	0	2
Do you think fair housing laws are adequately enforced?	2	0	0	0	2

Table 30.F.4

Fair Housing Activities

30. Remainder of Mahoning 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?		2	0	0	0	2
Have you participated in fair housing training?		2	0		0	2
Are you aware of any fair housing testing?		0	1	1	0	2
Testing and education	Too Little	Right Amount	Too Much	Don't Know	Missing	Total
Is there sufficient outreach and education activity?	1	1		0	0	2
Is there sufficient testing?	1			1	0	2

Table 30.F.5

Protected Classes

30. Remainder of Mahoning County
 2012–2013 Fair Housing Survey for Housing Stakeholders Data

Protected Class	Total
Family Status	1
Religion	1
Gender	1
Age	2
Total	5

Table 30.F.6

Fair Housing Violation Referrals

30. Remainder of Mahoning County
 2012–2013 Fair Housing Survey for Housing Stakeholders Data

Referral	Total
County	1
HUD	1
Total	2

LOCAL FAIR HOUSING

Table 30.F.7

Local Fair Housing

30. Remainder of Mahoning 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	0	1	0	2
Are there any specific geographic areas that have fair housing problems?	1	1	0	0	2
Are there any specific groups in that face housing discrimination?	0	1	1	0	2

FAIR HOUSING IN THE PRIVATE SECTOR

Table 30.F.8

Barriers to Fair Housing in the Private Sector

30. Remainder of Mahoning 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	0	0	2
The real estate industry?	0	1	1	0	2
The mortgage and home lending industry?	1	0	1	0	2
The housing construction or accessible housing design fields?	2	0	0	0	2
The home insurance industry?	0	1	1	0	2
The home appraisal industry?	0	1	1	0	2
Any other housing services?		1	1	0	2

FAIR HOUSING IN THE PUBLIC SECTOR

Table 30.F.9

Barriers to Fair Housing in the Public Sector

30. Remainder of Mahoning 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	1	1	0	2
Zoning laws?	0	0	1	1	2
Occupancy standards or health and safety codes?	0	0	2	0	2
Property tax policies?	0	0	2	0	2
Permitting process?		1	1	0	2
Housing construction standards?		1	1	0	2
Neighborhood or community development policies?	1	1	0	0	2
Limited access to government services, such as employment services?	0	0	2	0	2
Public administrative actions or regulations?		1	0	1	2

NARRATIVE COMMENTS

Federal, State, and Local Laws

Table 30.F.10

How did you become aware of fair housing laws?

30. Remainder of Mahoning County
2013 Fair Housing Survey Data

Comments:
Been doing this for over 30 years dealing with HUD and ODO, now ODSA< Real estate law

Local Fair Housing**Table 30.F.11****Are there any specific geographic areas that have fair housing problems?**30. Remainder of Mahoning County
2013 Fair Housing Survey Data

Comments:
Summer wind development. And barnstone development.

Table 30.F.12**Please share any additional comments.**30. Remainder of Mahoning County
2013 Fair Housing Survey Data

Comments:
Howard Hanna real estate company agents that work in Canfield discriminate often.

Fair Housing in the Private Sector**Table 30.F.13****Are you aware of any questionable practices or barriers to fair housing choice in the rental housing market?**30. Remainder of Mahoning County
2013 Fair Housing Survey Data

Comments:
Canfield Ohio does not accept people of color

Table 30.18**Are you aware of any questionable practices or barriers to fair housing choice in the mortgage and home lending industry?**30. Remainder of Mahoning County
2013 Fair Housing Survey Data

Comments:
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 30.F.14**Are you aware of any questionable practices or barriers to fair housing choice in the housing construction or accessible housing design fields?**30. Remainder of Mahoning County
2013 Fair Housing Survey Data

Comments:
Enforcement, Enforcement, Enforcement. 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

Table 30.F.15**Are you aware of any questionable practices or barriers to fair housing choice in the home appraisal industry?**30. Remainder of Mahoning County
2013 Fair Housing Survey Data

Comments:
But, I would assume there is.

Fair Housing in the Public Sector

Table 30.F.16

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

30. Remainder of Mahoning County
2013 Fair Housing Survey Data

Comments:
Laws r not followed in Canfield.

Table 30.F.17

Are you aware of any questionable practices or barriers to fair housing choice in housing construction standards?

30. Remainder of Mahoning County
2013 Fair Housing Survey Data

Comments:
But sometimes, the permitting agencies don't know the standards thoroughly.

Table 30.F.18

Are you aware of any questionable practices or barriers to fair housing choice in neighborhood or community development policies?

30. Remainder of Mahoning County
2013 Fair Housing Survey Data

Comments:
Canfield does not permit low Income housing

Table 30.F.19

Are you aware of any questionable practices or barriers to fair housing choice in any other public administrative actions or regulations?

30. Remainder of Mahoning County
2013 Fair Housing Survey Data

Comments:
Canfield zoning Canfield trustees Canfield residents

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 Mahoning County that received and completed the survey.²³

²³ 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 30.G.1
Housing Development
 30. Remainder of Mahoning 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	0	6	6	15
Guidelines that encourage development affordable housing units?	2	4	4	5	15
Any potential barriers to the development of low- to moderate- income housing?	5	4	1	5	15
Guidelines that allow the development of mixed use housing?	4		6	5	15
Any potential barriers to the development of mixed use housing?	1	3	6	5	15
Occupancy Standards					
A definition for the term "family"?	3	1	6	5	15
Residential occupancy standards or limits?	3	1	6	5	15
Special Needs Housing					
A definition for the term "disability"?	2	2	5	6	15
Development standards for making housing accessible to persons with disabilities?	3	2	4	6	15
A process by which persons with disabilities can request modification to the jurisdiction's policies?	2	2	5	6	15
Standards for the development of senior housing?	2	4	3	6	15
Guidelines that distinguish senior citizen housing from other residential uses?	1	2	6	6	15
Guidelines for developing housing for any other special needs populations?	2	1	6	6	15
Fair Housing Policies					
A fair housing ordinance, policy, or regulation?	3	1	4	7	15
Policies or practices for "affirmatively furthering fair housing"?	1	2	4	8	15

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 Mahoning 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 Mahoning 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 in the remainder of Mahoning County.

Results of the Fair Housing Surveys indicate that a few communities in Mahoning County lack or do not have sufficient policies or practices that adequately address the duty to affirmatively further fair housing.

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 Mahoning 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 Mahoning 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 remainder of Mahoning County 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 in the remainder of Mahoning County. 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 30.H.1
Impediments Matrix
 30. Remainder of Mahoning 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 ²⁴		
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	Lack of inclusionary policies							X		X	All	M

²⁴ 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.

31. MEDINA COUNTY

A. CENSUS BUREAU DATA

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

Table 31.A.1

Population by Age

31. Medina County

2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Under 5	10,632	7.0%	10,327	6.0%	-2.9%
5 to 19	34,405	22.8%	37,348	21.7%	8.6%
20 to 24	7,045	4.7%	7,801	4.5%	10.7%
25 to 34	19,177	12.7%	17,926	10.4%	-6.5%
35 to 54	50,018	33.1%	53,661	31.1%	7.3%
55 to 64	13,905	9.2%	22,668	13.2%	63.0%
65 or Older	15,913	10.5%	22,601	13.1%	42.0%
Total	151,095	100.0%	172,332	100.0%	14.1%

Table 31.A.2

Elderly Population by Age

31. Medina County

2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
65 to 66	1,899	11.9%	3,085	13.6%	62.5%
67 to 69	2,673	16.8%	4,399	19.5%	64.6%
70 to 74	4,096	25.7%	5,322	23.5%	29.9%
75 to 79	3,402	21.4%	3,856	17.1%	13.3%
80 to 84	2,125	13.4%	3,066	13.6%	44.3%
85 or Older	1,718	10.8%	2,873	12.7%	67.2%
Total	15,913	100.0%	22,601	100.0%	42.0%

Table 31.A.3

Population by Race and Ethnicity

31. Medina County

2000 & 2010 Census SF1 Data

Race	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
White	146,956	97.3%	165,642	96.1%	12.7%
Black	1,323	.9%	2,027	1.2%	53.2%
American Indian	232	.2%	247	.1%	6.5%
Asian	969	.6%	1,660	1.0%	71.3%
Native Hawaiian/ Pacific Islander	25	.0%	18	.0%	-28.0%
Other	375	.2%	652	.4%	73.9%
Two or More Races	1,215	.8%	2,086	1.2%	71.7%
Total	151,095	100.0%	172,332	100.0%	14.1%
Non-Hispanic	149,696	99.1	169,585	98.4%	13.3%
Hispanic	1,399	.9%	2,747	1.6%	96.4%

Table 31.A.4
Disability by Age
 31. Medina County
 2010 Three-Year ACS Data

Age	Male		Female		Total	
	Disabled Population	Disability Rate	Disabled Population	Disability Rate	Disabled Population	Disability Rate
Under 5	42	.8%	25	.5%	67	.6%
5 to 17	770	4.5%	602	3.6%	1,372	4.1%
18 to 34	968	6.6%	653	4.4%	1,621	5.5%
35 to 64	3,761	10.1%	3,625	9.4%	7,386	9.7%
65 to 74	1,305	22.4%	1,235	19.2%	2,540	20.7%
75 or Older	1,521	40.5%	2,540	48.1%	4,061	44.9%
Total	8,367	10.0%	8,680	10.0%	17,047	10.0%

Table 31.A.5
Employment Status by Disability and Type: Age 18 to 64
 31. Medina County
 2010 Three-Year ACS Data

Disability Status	Population
Employed:	81,993
With a disability:	3,932
With a hearing difficulty	1,523
With a vision difficulty	478
With a cognitive difficulty	1,010
With an ambulatory difficulty	1,241
With a self-care difficulty	388
With an independent living difficulty	536
No disability	78,061
Unemployed:	5,566
With a disability:	469
With a hearing difficulty	72
With a vision difficulty	60
With a cognitive difficulty	290
With an ambulatory difficulty	126
With a self-care difficulty	0
With an independent living difficulty	144
No disability	5,097
Not in labor force:	17,723
With a disability:	4,606
With a hearing difficulty	738
With a vision difficulty	731
With a cognitive difficulty	2,058
With an ambulatory difficulty	3,036
With a self-care difficulty	1,411
With an independent living difficulty	2,506
No disability	13,117
Total	105,282

Table 31.A.6
Households by Income

31. Medina 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	4,194	7.7%	4,290	6.7%
\$15,000 to \$19,999	2,112	3.9%	2,388	3.7%
\$20,000 to \$24,999	2,697	4.9%	2,573	4.0%
\$25,000 to \$34,999	5,618	10.3%	5,406	8.4%
\$35,000 to \$49,999	8,864	16.3%	8,322	13.0%
\$50,000 to \$74,999	14,159	26.0%	13,604	21.2%
\$75,000 to \$99,999	8,706	16.0%	10,917	17.0%
\$100,000 or More	8,188	15.0%	16,702	26.0%
Total	54,538	100.0%	64,202	100.0%

Table 31.A.7
Poverty by Age

31. Medina 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	936	13.7%	1,170	11.0%
6 to 17	1,631	23.8%	2,598	24.5%
18 to 64	3,559	52.0%	5,684	53.6%
65 or Older	723	10.6%	1,146	10.8%
Total	6,849	100.0%	10,598	100.0%
Poverty Rate	4.6%	.	6.3%	.

Table 31.A.8
Households by Year Home Built

31. Medina 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	7,360	13.5%	6,725	10.5%
1940 to 1949	2,024	3.7%	1,837	2.9%
1950 to 1959	6,153	11.3%	6,153	9.6%
1960 to 1969	5,746	10.5%	5,293	8.2%
1970 to 1979	13,058	23.9%	12,843	20.0%
1980 to 1989	6,553	12.0%	6,381	9.9%
1990 to 1999	13,648	25.0%	14,280	22.2%
2000 to 2004	.	.	7,939	12.4%
2005 or Later	.	.	2,751	4.3%
Total	54,542	100.0%	64,202	100.0%

Table 31.A.9
Housing Units by Type

31. Medina County
2000 Census SF3 & 2010 Five-Year ACS Data

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

Table 31.A.10
Housing Units by Tenure

31. Medina County
2000 & 2010 Census SF1 Data

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

Table 31.A.11
Disposition of Vacant Housing Units

31. Medina County
2000 & 2010 Census SF1 Data

Disposition	2000 Census		2010 Census		% Change 00–10
	Units	% of Total	Units	% of Total	
For Rent	733	32.6%	1,400	34.7%	91.0%
For Sale	502	22.3%	880	21.8%	75.3%
Rented or Sold, Not Occupied	330	14.7%	291	7.2%	-11.8%
For Seasonal, Recreational, or Occasional Use	298	13.2%	443	11.0%	48.7%
For Migrant Workers	1	0.0%	0	.0%	-100.0%
Other Vacant	387	17.2%	1,024	25.4%	164.6%
Total	2,251	100.0%	4,038	100.0%	79.4%

Table 31.A.12
Households by Household Size

31. Medina County
2000 & 2010 Census SF1 Data

Size	2000 Census		2010 Census		% Change 00–10
	Households	% of Total	Households	% of Total	
One Person	10,286	18.9%	14,072	21.6%	36.8%
Two Persons	18,439	33.8%	23,226	35.7%	26.0%
Three Persons	9,891	18.1%	10,864	16.7%	9.8%
Four Persons	9,780	17.9%	10,233	15.7%	4.6%
Five Persons	4,253	7.8%	4,602	7.1%	8.2%
Six Persons	1,355	2.5%	1,476	2.3%	8.9%
Seven Persons or More	538	1.0%	670	1.0%	24.5%
Total	54,542	100.0%	65,143	100.0%	19.4%

Table 31.A.13
Household Type by Tenure
 31. Medina County
 2000 & 2010 Census SF1 Data

Household Type	2000 Census		2010 Census		% Change 00–10
	Households	% of Total	Households	% of Total	
Family Households	42,202	77.4%	48,214	74.0%	14.2%
Married-Couple Family	36,255	85.9%	40,031	83.0%	10.4%
Owner-Occupied	33,054	91.2%	36,756	91.8%	11.2%
Renter-Occupied	3,201	8.8%	3,275	8.2%	2.3%
Other Family	5,947	14.1%	8,183	17.0%	37.6%
Male Householder, No Spouse	1,686	28.4%	2,498	30.5%	48.2%
Owner-Occupied	1,167	69.2%	1,715	68.7%	47.0%
Renter-Occupied	519	30.8%	783	31.3%	50.9%
Female Householder, No Spouse	4,261	71.6%	5,685	69.5%	33.4%
Owner-Occupied	2,656	62.3%	3,449	60.7%	29.9%
Renter-Occupied	1,605	37.7%	2,236	39.3%	39.3%
Non-Family Households	12,340	22.6%	16,929	26.0%	37.2%
Owner-Occupied	7,439	60.3%	10,616	62.7%	42.7%
Renter-Occupied	4,901	39.7%	6,313	37.3%	28.8%
Total	54,542	100.0%	65,143	100.0%	19.4%

Table 31.A.14
Group Quarters Population
 31. Medina 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	228	18.2%	136	13.6%	-40.4%
Juvenile Facilities	.	.	23	2.3%	.
Nursing Homes	1,021	81.3%	844	84.1%	-17.3%
Other Institutions	7	.6%	0	.0%	-100.0%
Total	1,256	100.0%	1,003	100.0%	-20.1%
Noninstitutionalized					
College Dormitories	0	.0%	0	.0%	%
Military Quarters	0	.0%	0	.0%	%
Other Noninstitutional	263	100.0%	195	100.0%	-25.9%
Total	263	17.3%	195	16.3%	-25.9%
Total Group Quarters Population	1,519	100.0%	1,198	100.0%	-21.1%

Table 31.A.15
Overcrowding and Severe Overcrowding
 31. Medina 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	43,960	99.2%	276	.6%	66	.1%	44,302
2010 ACS	52,228	99.5%	263	.5%	14	.0%	52,505
Renter							
2000 Census	9,970	97.4%	214	2.1%	56	.5%	10,240
2010 ACS	11,407	97.5%	225	1.9%	65	.6%	11,697
Total							
2000 Census	53,930	98.9%	490	.9%	122	.2%	54,542
2010 ACS	63,635	99.1%	488	.8%	79	.1%	64,202

Table 31.A.16
Households with Incomplete Plumbing Facilities
 31. Medina County
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Plumbing Facilities	54,318	63,782
Lacking Complete Plumbing Facilities	224	420
Total Households	54,542	64,202
Percent Lacking	.4%	.7%

Table 31.A.17
Households with Incomplete Kitchen Facilities
 31. Medina County
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Kitchen Facilities	54,313	63,520
Lacking Complete Kitchen Facilities	229	682
Total Households	54,542	64,202
Percent Lacking	.4%	1.1%

Table 31.A.18
Cost Burden and Severe Cost Burden by Tenure
 31. Medina 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	22,720	76.0%	5,106	17.1%	1,994	6.7%	59	.2%	29,879
2010 ACS	27,466	68.9%	8,544	21.4%	3,719	9.3%	130	.3%	39,859
Owner Without a Mortgage									
2000 Census	8,516	91.7%	421	4.5%	230	2.5%	122	1.3%	9,289
2010 ACS	10,815	85.5%	1,067	8.4%	608	4.8%	156	1.2%	12,646
Renter									
2000 Census	5,988	60.4%	2,051	20.7%	1,243	12.5%	625	6.3%	9,907
2010 ACS	5,741	49.1%	2,715	23.2%	2,558	21.9%	683	5.8%	11,697
Total									
2000 Census	37,224	75.9%	7,578	15.4%	3,467	7.1%	806	1.6%	49,075
2010 ACS	44,022	68.6%	12,326	19.2%	6,885	10.7%	969	1.5%	64,202

Table 31.A.19
Median Housing Costs
 31. Medina County
 2000 Census SF3 & 2010 Five-Year ACS Data

Housing Cost	2000 Census	2010 ACS
Median Contract Rent	\$521	\$636
Median Home Value	\$144,400	\$184,900

B. BEA DATA

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

Table 31.B.1
Employment by Industry
 31. Medina County
 Select Years 2001–2010 BEA Data

NAICS Categories	2001	2005	2006	2007	2008	2009	2010	% Change 01–10
Farm employment	1,548	1,193	1,120	1,050	982	990	983	-36.5%
Forestry, fishing, related activities, and other	164	168	147	(D)	178	176	182	11.0%
Mining	230	200	219	(D)	268	262	276	20.0%
Utilities	(D) ²⁵	(D)	(D)	(D)	(D)	(D)	(D)	%
Construction	5,518	6,806	6,255	6,242	6,023	5,763	5,340	-3.2%
Manufacturing	11,132	10,254	10,446	10,471	10,155	8,727	8,849	-20.5%
Wholesale trade	3,394	3,608	3,596	(D)	(D)	(D)	(D)	%
Retail trade	9,243	10,318	10,707	11,122	10,834	10,745	10,744	16.2%
Transportation and warehousing	(D)	(D)	(D)	4,136	4,158	3,897	3,740	%
Information	763	845	852	835	812	703	715	-6.3%
Finance and insurance	2,279	2,595	2,599	2,718	2,950	3,379	3,499	53.5%
Real estate and rental and leasing	2,838	4,000	4,207	4,158	4,104	4,229	4,188	47.6%
Professional and technical services	3,961	4,259	4,357	4,584	4,450	4,312	4,429	11.8%
Management of companies and enterprises	2,016	2,571	2,675	2,673	2,849	2,694	2,736	35.7%
Administrative and waste services	4,417	5,138	5,085	5,156	5,493	5,303	5,038	14.1%
Educational services	504	865	862	871	945	960	1,002	98.8%
Health care and social assistance	5,967	6,744	7,109	7,312	7,616	7,833	8,012	34.3%
Arts, entertainment, and recreation	1,595	2,021	1,979	1,979	2,049	1,916	1,879	17.8%
Accommodation and food services	4,697	5,270	5,407	5,754	5,550	5,397	5,500	17.1%
Other services, except public administration	3,624	4,184	4,251	4,389	4,307	4,308	4,241	17.0%
Government and government enterprises	7,201	7,779	7,901	8,094	8,101	8,015	7,782	8.1%
Total	74,394	82,629	83,803	85,470	85,249	82,802	82,444	10.8%

²⁵ (D): These data are not shown to avoid disclosure of confidential information, but estimates are included in the totals.

Table 31.B.2
Real Earnings by Industry

31. Medina County
 Select Years 2001–2010 BEA Data, Real 2011 Dollars

NAICS Categories	2001	2005	2006	2007	2008	2009	2010	% Change 00–10
Farm earnings	14,286	17,903	10,249	10,526	10,665	14,927	8,865	-37.9%
Forestry, fishing, related activities, and other	3,215	4,176	4,041	(D)	3,582	2,797	2,910	-9.5%
Mining	5,003	10,417	11,960	(D)	7,417	3,160	2,720	-45.6%
Utilities	(D) ²⁶	(D)	(D)	(D)	(D)	(D)	(D)	%
Construction	249,179	332,801	314,922	280,707	258,372	249,353	241,130	-3.2%
Manufacturing	602,253	603,773	601,185	605,255	603,108	527,611	551,635	-8.4%
Wholesale trade	203,332	217,893	216,002	(D)	(D)	(D)	(D)	%
Retail trade	256,456	281,032	284,202	288,581	273,656	271,193	275,050	7.3%
Transportation and warehousing	(D)	(D)	(D)	180,117	181,147	168,243	161,942	%
Information	31,154	31,896	29,940	27,674	26,893	22,621	22,332	-28.3%
Finance and insurance	81,133	106,905	109,556	108,272	97,372	97,140	94,186	16.1%
Real estate and rental and leasing	64,238	48,064	46,372	35,174	43,378	49,847	45,611	-29.0%
Professional and technical services	163,659	163,581	167,346	169,399	168,063	152,924	162,069	-1.0%
Management of companies and enterprises	142,772	264,263	273,589	255,625	255,148	224,743	242,539	69.9%
Administrative and waste services	140,958	151,578	141,535	137,748	140,542	147,198	137,356	-2.6%
Educational services	8,371	11,923	11,506	12,369	13,316	13,660	14,184	69.4%
Health care and social assistance	234,006	281,817	290,943	288,401	302,449	309,084	309,451	32.2%
Arts, entertainment, and recreation	25,744	25,140	25,882	24,837	22,912	22,179	21,303	-17.3%
Accommodation and food services	71,890	78,157	78,462	86,563	85,489	86,508	89,844	25.0%
Other services, except public administration	107,835	136,637	136,660	135,255	127,396	127,476	127,632	18.4%
Government and government enterprises	359,502	415,673	417,581	422,579	428,346	436,622	436,485	21.4%
Total	2,932,873	3,370,287	3,355,124	3,301,925	3,262,414	3,117,127	3,153,252	7.5%

²⁶ (D): These data are not shown to avoid disclosure of confidential information, but estimates are included in the totals.

Table 31.B.3
Real Earnings Per Job by Industry
 31. Medina 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	9,229	15,007	9,151	10,025	10,860	15,078	9,019	-2.3%
Forestry, fishing, related activities, and other	19,603	24,858	27,491	(D)	20,124	15,890	15,988	-18.4%
Mining	21,752	52,084	54,611	(D)	27,674	12,062	9,854	-54.7%
Utilities	(D) ²⁷	(D)	(D)	(D)	(D)	(D)	(D)	%
Construction	45,157	48,898	50,347	44,971	42,898	43,268	45,155	.0%
Manufacturing	54,101	58,882	57,552	57,803	59,390	60,457	62,339	15.2%
Wholesale trade	59,909	60,392	60,067	(D)	(D)	(D)	(D)	%
Retail trade	27,746	27,237	26,544	25,947	25,259	25,239	25,600	-7.7%
Transportation and warehousing	(D)	(D)	(D)	43,549	43,566	43,173	43,300	%
Information	40,831	37,747	35,141	33,142	33,119	32,177	31,233	-23.5%
Finance and insurance	35,600	41,197	42,153	39,835	33,007	28,748	26,918	-24.4%
Real estate and rental and leasing	22,635	12,016	11,023	8,459	10,570	11,787	10,891	-51.9%
Professional and technical services	41,317	38,408	38,409	36,954	37,767	35,465	36,593	-11.4%
Management of companies and enterprises	70,820	102,786	102,276	95,632	89,557	83,423	88,647	25.2%
Administrative and waste services	31,913	29,501	27,834	26,716	25,586	27,758	27,264	-14.6%
Educational services	16,610	13,784	13,348	14,201	14,091	14,229	14,156	-14.8%
Health care and social assistance	39,217	41,788	40,926	39,442	39,712	39,459	38,623	-1.5%
Arts, entertainment, and recreation	16,141	12,439	13,078	12,550	11,182	11,575	11,338	-29.8%
Accommodation and food services	15,305	14,831	14,511	15,044	15,403	16,029	16,335	6.7%
Other services, except public administration	29,756	32,657	32,148	30,817	29,579	29,591	30,095	1.1%
Government and government enterprises	49,924	53,435	52,852	52,209	52,876	54,476	56,089	12.3%
Average	39,423	40,788	40,036	38,632	38,269	37,645	38,247	-2.98%

²⁷ (D): These data are not shown to avoid disclosure of confidential information, but estimates are included in the totals.

Table 31.B.4
Total Employment and Real Personal Income
 31. Medina 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	731,921	46,543	634,251	171,334	78,459	1,569,421	18,952	23,985	30,514
1970	778,883	48,958	569,991	180,852	86,537	1,567,305	18,855	25,138	30,984
1971	836,358	54,449	595,409	188,900	93,088	1,659,305	19,648	26,488	31,576
1972	880,871	59,043	686,524	196,176	102,015	1,806,542	21,203	27,358	32,196
1973	960,494	74,670	763,692	208,305	116,886	1,974,708	21,942	29,915	32,107
1974	969,231	78,466	816,919	219,286	129,237	2,056,207	22,133	31,068	31,197
1975	933,714	72,182	812,783	227,927	156,963	2,059,204	21,264	30,566	30,548
1976	1,007,221	78,490	889,440	234,765	163,890	2,216,825	22,360	31,855	31,619
1977	1,089,358	85,617	996,465	248,738	160,760	2,409,705	23,351	34,123	31,923
1978	1,179,591	97,145	1,086,872	264,615	166,328	2,600,261	24,099	36,459	32,353
1979	1,249,924	107,967	1,133,535	285,996	182,072	2,743,560	24,648	38,511	32,457
1980	1,154,424	99,985	1,157,408	332,640	235,273	2,779,760	24,505	37,589	30,713
1981	1,129,580	104,439	1,151,055	376,197	231,073	2,783,467	24,349	37,363	30,232
1982	1,095,912	101,634	1,097,757	404,650	263,407	2,760,092	24,005	36,707	29,855
1983	1,125,556	107,421	1,089,282	425,409	273,392	2,806,218	24,355	37,494	30,019
1984	1,221,662	119,187	1,149,590	471,057	275,815	2,998,937	25,978	39,555	30,885
1985	1,239,328	123,620	1,196,311	490,363	290,227	3,092,610	26,852	40,513	30,592
1986	1,305,204	135,549	1,212,364	508,140	310,106	3,200,266	27,754	42,392	30,788
1987	1,388,876	145,680	1,230,530	504,468	319,941	3,298,134	28,244	44,580	31,155
1988	1,515,329	163,808	1,259,030	536,122	335,741	3,482,414	29,188	46,393	32,663
1989	1,579,574	173,408	1,294,145	585,301	353,096	3,638,708	30,109	48,004	32,905
1990	1,611,851	181,434	1,311,760	591,226	386,302	3,719,705	30,258	49,279	32,708
1991	1,634,638	187,855	1,318,214	581,533	409,864	3,756,394	29,934	50,206	32,558
1992	1,771,245	205,471	1,362,297	602,046	442,482	3,972,599	30,938	52,446	33,772
1993	1,874,259	220,318	1,396,197	616,855	456,844	4,123,837	31,474	55,135	33,994
1994	2,009,933	240,009	1,490,863	671,719	465,248	4,397,753	32,858	57,859	34,739
1995	2,141,874	258,483	1,513,723	733,325	488,578	4,619,017	33,740	60,391	35,467
1996	2,240,271	268,100	1,529,885	798,970	520,175	4,821,201	34,424	62,769	35,691
1997	2,387,497	280,642	1,611,743	904,508	536,873	5,159,979	36,084	65,598	36,396
1998	2,625,579	296,614	1,694,570	979,834	548,712	5,552,081	38,138	69,060	38,019
1999	2,778,239	311,468	1,786,216	984,136	573,837	5,810,959	38,964	71,146	39,050
2000	2,870,954	309,970	1,888,643	1,016,277	607,561	6,073,464	40,023	72,845	39,412
2001	2,932,873	318,247	1,853,174	937,255	658,459	6,063,515	39,281	74,394	39,423
2002	3,009,220	318,500	1,821,568	882,932	698,436	6,093,655	38,690	75,564	39,823
2003	3,172,881	338,121	1,845,881	881,493	730,212	6,292,345	39,247	77,670	40,851
2004	3,260,545	355,672	1,877,832	843,502	747,282	6,373,489	39,089	79,950	40,782
2005	3,370,287	369,300	1,848,852	857,941	783,076	6,490,857	39,350	82,629	40,788
2006	3,355,124	373,823	1,890,521	978,538	821,225	6,671,584	39,879	83,803	40,036
2007	3,301,925	370,233	1,932,667	1,122,989	860,292	6,847,639	40,572	85,470	38,632
2008	3,262,414	373,608	1,956,146	1,096,056	924,581	6,865,588	40,307	85,249	38,269
2009	3,117,127	363,159	1,933,829	907,109	1,046,835	6,641,741	38,685	82,802	37,645
2010	3,153,252	365,182	2,027,807	907,466	1,080,517	6,803,861	39,424	82,444	38,247

C. BLS DATA

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

Table 31.C.1
Labor Force Statistics
 31. Medina County
 1990–2011 BLS Data

Year	Labor Force	Employment	Unemployment	Unemployment Rate	Statewide Unemployment Rate
1990	65,043	61,681	3,362	5.2%	5.7%
1991	65,045	60,994	4,051	6.2%	6.6%
1992	67,129	62,315	4,814	7.2%	7.4%
1993	68,823	64,604	4,219	6.1%	6.7%
1994	71,220	67,181	4,039	5.7%	5.6%
1995	72,736	69,377	3,359	4.6%	4.9%
1996	74,980	71,896	3,084	4.1%	5.0%
1997	77,552	74,676	2,876	3.7%	4.6%
1998	79,592	77,065	2,527	3.2%	4.3%
1999	82,777	79,942	2,835	3.4%	4.3%
2000	84,945	82,178	2,767	3.3%	4.0%
2001	86,862	83,617	3,245	3.7%	4.4%
2002	88,542	84,500	4,042	4.6%	5.7%
2003	90,434	85,779	4,655	5.1%	6.2%
2004	91,591	86,942	4,649	5.1%	6.1%
2005	92,759	88,224	4,535	4.9%	5.9%
2006	94,903	90,302	4,601	4.8%	5.4%
2007	96,557	91,381	5,176	5.4%	5.6%
2008	97,538	91,719	5,819	6.0%	6.5%
2009	97,418	89,654	7,764	8.0%	10.1%
2010	96,776	89,228	7,548	7.8%	10.0%
2011	96,880	90,408	6,472	6.7%	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.²⁸ The information presented in this section presents detailed HMDA data, including denial rates and predatory lending including high annual percentage rate (APR) loans.

Table 31.D.1
Purpose of Loan by Year
31. Medina County
2004–2011 HMDA Data

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

Table 31.D.2
Occupancy Status for Home Purchase Loan Applications
31. Medina County
2004–2011 HMDA Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	Total
Owner-Occupied	5,943	6,401	5,713	4,599	3,251	3,111	3,029	2,826	34,873
Not Owner-Occupied	290	406	379	262	143	78	109	131	1,798
Not Applicable	31	10	5	5	5	2	1	4	63
Total	6,264	6,817	6,097	4,866	3,399	3,191	3,139	2,961	36,734

Table 31.D.3
Owner-Occupied Home Purchase Loan Applications by Loan Type
31. Medina County
2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Conventional	5,433	5,941	5,340	4,163	1,880	1,353	1,372	1,376	26,858
FHA - Insured	435	360	284	339	1,193	1,530	1,482	1,193	6,816
VA - Guaranteed	75	90	83	77	158	161	135	183	962
Rural Housing Service or Farm Service Agency	0	10	6	20	20	67	40	74	237
Total	5,943	6,401	5,713	4,599	3,251	3,111	3,029	2,826	34,873

²⁸ 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 31.D.4
Loan Applications by Action Taken
 31. Medina County
 2004–2011 HMDA Data

Action	2004	2005	2006	2007	2008	2009	2010	2011	Total
Loan Originated	3,723	3,961	3,388	2,705	1,856	1,667	1,642	1,462	20,404
Application Approved but not Accepted	334	312	284	210	123	76	88	77	1,504
Application Denied	418	477	458	399	252	176	199	166	2,545
Application Withdrawn by Applicant	318	373	295	161	138	115	127	147	1,674
File Closed for Incompleteness	96	93	79	84	28	24	40	20	464
Loan Purchased by the Institution	1,054	1,178	1,208	1,039	853	1,053	933	954	8,272
Preapproval Request Denied	0	7	1	1	1	0	0	0	10
Preapproval Approved but not Accepted	0	0	0	0	0	0	0	0	0
Total	5,943	6,401	5,713	4,599	3,251	3,111	3,029	2,826	34,873
Denial Rate	10.1%	10.7%	11.9%	12.9%	12.0%	9.5%	10.8%	10.2%	11.1%

Table 31.D.5
Denial Rates by Gender of Applicant
 31. Medina County
 2004–2011 HMDA Data

Year	Male	Female	Not Available	Not Applicable	Average
2004	8.6%	12.0%	32.5%	.0%	10.1%
2005	9.6%	13.3%	21.1%	.0%	10.7%
2006	9.8%	16.3%	21.1%	.0%	11.9%
2007	10.7%	16.9%	27.7%	%	12.9%
2008	12.1%	10.4%	21.4%	.0%	12.0%
2009	9.3%	10.5%	8.3%	.0%	9.5%
2010	10.8%	11.7%	7.4%	%	10.8%
2011	9.0%	10.8%	24.4%	%	10.2%
Average	9.9%	13.3%	21.3%	.0%	11.1%

Table 31.D.6
Loan Applications by Selected Action Taken by Gender of Applicant
 31. Medina County
 2004–2011 HMDA Data

Gender		2004	2005	2006	2007	2008	2009	2010	2011	Total
Male	Originated	2,805	2,963	2,435	1,988	1,331	1,184	1,137	1,048	14,891
	Denied	265	314	266	239	184	121	137	104	1,630
	Denial Rate	8.6%	9.6%	9.8%	10.7%	12.1%	9.3%	10.8%	9.0%	9.9%
Female	Originated	835	907	849	636	480	416	417	355	4,895
	Denied	114	139	165	129	56	49	55	43	750
	Denial Rate	12.0%	13.3%	16.3%	16.9%	10.4%	10.5%	11.7%	10.8%	13.3%
Not Available	Originated	81	90	101	81	44	66	88	59	610
	Denied	39	24	27	31	12	6	7	19	165
	Denial Rate	32.5%	21.1%	21.1%	27.7%	21.4%	8.3%	7.4%	24.4%	21.3%
Not Applicable	Originated	2	1	3	0	1	1	0	0	8
	Denied	0	0	0	0	0	0	0	0	0
	Denial Rate	.0%	.0%	.0%	%	.0%	.0%	%	%	.0%
Total	Originated	3,723	3,961	3,388	2,705	1,856	1,667	1,642	1,462	20,404
	Denied	418	477	458	399	252	176	199	166	2,545
	Denial Rate	10.1%	10.7%	11.9%	12.9%	12.0%	9.5%	10.8%	10.2%	11.1%

Table 31.D.7
Denial Rates by Race/Ethnicity of Applicant
 31. Medina County
 2004–2011 HMDA Data

Race/Ethnicity	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	18.2%	8.3%	9.1%	50.0%	42.9%	.0%	.0%	12.5%	15.7%
Asian	7.7%	8.5%	26.2%	22.0%	16.7%	25.0%	18.8%	13.3%	16.8%
Black	23.1%	23.5%	26.7%	39.2%	33.3%	41.2%	11.8%	20.0%	28.1%
White	9.0%	9.8%	10.8%	11.1%	11.0%	8.8%	10.8%	9.5%	10.1%
Not Available	24.0%	22.7%	21.4%	29.0%	23.3%	13.9%	10.4%	19.2%	21.5%
Not Applicable	11.1%	.0%	.0%	%	.0%	0.0%	0%	%	6.7%
Average	10.1%	10.7%	11.9%	12.9%	12.0%	9.5%	10.8%	10.2%	11.1%
Non-Hispanic	9.3%	9.7%	11.2%	11.8%	11.2%	9.5%	10.7%	9.5%	10.4%
Hispanic	21.8%	17.6%	14.3%	20.0%	11.1%	8.7%	21.1%	15.0%	16.9%

Table 31.D.8
Loan Applications by Selected Action Taken by Race/Ethnicity of Applicant
 31. Medina County
 2004–2011 HMDA Data

Race		2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Originated	9	11	10	3	4	9	6	7	59
	Denied	2	1	1	3	3	0	0	1	11
	Denial Rate	18.2%	8.3%	9.1%	50.0%	42.9%	.0%	.0%	12.5%	15.7%
Asian	Originated	36	43	31	32	20	15	13	13	203
	Denied	3	4	11	9	4	5	3	2	41
	Denial Rate	7.7%	8.5%	26.2%	22.0%	16.7%	25.0%	18.8%	13.3%	16.8%
Black	Originated	30	39	44	31	12	10	15	8	189
	Denied	9	12	16	20	6	7	2	2	74
	Denial Rate	23.1%	23.5%	26.7%	39.2%	33.3%	41.2%	11.8%	20.0%	28.1%
White	Originated	3,440	3,646	3,098	2,507	1,740	1,533	1,488	1,350	18,802
	Denied	340	395	375	313	215	148	180	141	2,107
	Denial Rate	9.0%	9.8%	10.8%	11.1%	11.0%	8.8%	10.8%	9.5%	10.1%
Not Available	Originated	200	221	202	132	79	99	120	84	1,137
	Denied	63	65	55	54	24	16	14	20	311
	Denial Rate	24.0%	22.7%	21.4%	29.0%	23.3%	13.9%	10.4%	19.2%	21.5%
Not Applicable	Originated	8	1	3	0	1	1	0	0	14
	Denied	1	0	0	0	0	0	0	0	1
	Denial Rate	24.0%	22.7%	21.4%	29.0%	23.3%	13.9%	10.4%	19.2%	6.7%
Total	Originated	3,723	3,961	3,388	2,705	1,856	1,667	1,642	1,462	20,404
	Denied	418	477	458	399	252	176	199	166	2,545
	Denial Rate	10.1%	10.7%	11.9%	12.9%	12.0%	9.5%	10.8%	10.2%	11.1%
Non-Hispanic	Originated	3,028	3,665	3,143	2,532	1,743	1,531	1,507	1,354	18,503
	Denied	310	393	398	339	220	160	181	142	2,143
	Denial Rate	9.3%	9.7%	11.2%	11.8%	11.2%	9.5%	10.7%	9.5%	10.4%
Hispanic	Originated	43	42	48	36	24	21	15	17	246
	Denied	12	9	8	9	3	2	4	3	50
	Denial Rate	21.8%	17.6%	14.3%	20.0%	11.1%	8.7%	21.1%	15.0%	16.9%

Table 31.D.9
Loan Applications by Reason for Denial
 31. Medina County
 2004–2011 HMDA Data

Denial Reason	2004	2005	2006	2007	2008	2009	2010	2011	Total
Debt-to-Income Ratio	60	59	54	71	58	34	43	37	416
Employment History	9	13	18	7	4	7	8	14	80
Credit History	86	96	84	91	40	39	47	26	509
Collateral	40	35	39	37	45	39	40	33	308
Insufficient Cash	7	8	7	7	4	3	5	3	44
Unverifiable Information	13	19	19	19	15	6	6	3	100
Credit Application Incomplete	55	43	49	44	22	15	11	14	253
Mortgage Insurance Denied	0	0	0	0	1	1	2	3	7
Other	51	121	75	50	21	12	21	15	366
Missing	97	83	113	73	42	20	16	18	462
Total	418	477	458	399	252	176	199	166	2,545

Table 31.D.10
Denial Rates by Income of Applicant
 31. Medina County
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	45.0%	38.5%	60.0%	58.3%	33.3%	25.0%	50.0%	55.6%	47.1%
\$15,001–\$30,000	22.9%	20.1%	23.2%	26.4%	22.0%	14.2%	20.7%	17.6%	21.4%
\$30,001–\$45,000	13.3%	12.8%	13.8%	16.5%	17.7%	11.1%	15.3%	15.8%	14.2%
\$45,001–\$60,000	10.6%	13.2%	12.6%	13.0%	11.6%	10.8%	10.3%	8.7%	11.7%
\$60,001–\$75,000	7.7%	8.8%	11.4%	11.4%	9.9%	9.8%	9.8%	9.6%	9.7%
Above \$75,000	6.4%	7.6%	9.3%	9.5%	8.8%	7.1%	6.1%	6.7%	7.9%
Data Missing	11.1%	13.4%	10.4%	19.7%	5.6%	6.3%	37.5%	13.3%	13.4%
Total	10.1%	10.7%	11.9%	12.9%	12.0%	9.5%	10.8%	10.2%	11.1%

Table 31.D.11
Denial Rates of Loans by Race/Ethnicity and Income of Applicant
 31. Medina County
 2004–2011 HMDA Data

Race	<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	Above \$75K	Data Missing	Average
American Indian	%	50.0%	21.4%	20.0%	18.2%	7.1%	.0%	15.7%
Asian	100.0%	44.4%	9.4%	26.2%	15.2%	13.6%	11.1%	16.8%
Black	%	44.4%	31.3%	31.9%	11.3%	33.0%	23.1%	28.1%
White	45.4%	18.9%	13.1%	10.8%	9.1%	7.0%	11.0%	10.1%
Not Available	66.7%	54.0%	30.8%	20.4%	16.4%	14.6%	38.5%	21.5%
Not Applicable	%	.0%	%	.0%	50.0%	.0%	.0%	6.7%
Average	47.1%	21.4%	14.2%	11.7%	9.7%	7.9%	13.4%	11.1%
Non-Hispanic Ethnicity	44.2%	19.1%	13.3%	11.2%	9.0%	7.5%	11.8%	10.4%
Hispanic (Ethnicity)	%	28.6%	14.0%	22.2%	24.6%	10.9%	.0%	16.9%

Table 31.D.12
Loan Applications by Reason for Denial by Race/Ethnicity of Applicant

31. Medina County
 2004–2011 HMDA Data

Denial Reason	American Indian	Asian	Black	White	Not Available	Not Applicable	Total	Hispanic (Ethnicity)
Debt-to-Income Ratio	2	7	7	352	48	0	416	3
Employment History	0	6	0	70	4	0	80	3
Credit History	5	8	15	422	59	0	509	11
Collateral	0	5	9	273	21	0	308	9
Insufficient Cash	0	0	2	38	4	0	44	1
Unverifiable Information	0	3	7	81	9	0	100	2
Credit Application Incomplete	1	3	9	199	40	1	253	3
Mortgage Insurance Denied	0	0	0	7	0	0	7	0
Other	0	5	8	300	53	0	366	8
Missing	3	4	17	365	73	0	462	10
Total	11	41	74	2,107	311	1	2,545	50
% Missing	27.3%	9.8%	23.0%	17.3%	23.5%	.0%	18.2%	20.0%

Table 31.D.13
Loan Applications by Income of Applicant: Originated and Denied

31. Medina County
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Loan Originated	11	16	8	5	6	3	2	4	55
	Application Denied	9	10	12	7	3	1	2	5	49
	Denial Rate	45.0%	38.5%	60.0%	58.3%	33.3%	25.0%	50.0%	55.6%	47.1%
\$15,001–\$30,000	Loan Originated	202	195	156	145	103	115	115	98	1,129
	Application Denied	60	49	47	52	29	19	30	21	307
	Denial Rate	22.9%	20.1%	23.2%	26.4%	22.0%	14.2%	20.7%	17.6%	21.4%
\$30,001–\$45,000	Loan Originated	617	615	469	344	297	329	276	245	3,192
	Application Denied	95	90	75	68	64	41	50	46	529
	Denial Rate	13.3%	12.8%	13.8%	16.5%	17.7%	11.1%	15.3%	15.8%	14.2%
\$45,001–\$60,000	Loan Originated	707	738	587	467	357	321	305	264	3,746
	Application Denied	84	112	85	70	47	39	35	25	497
	Denial Rate	10.6%	13.2%	12.6%	13.0%	11.6%	10.8%	10.3%	8.7%	11.7%
\$60,001–\$75,000	Loan Originated	669	706	570	449	281	240	222	208	3,345
	Application Denied	56	68	73	58	31	26	24	22	358
	Denial Rate	7.7%	8.8%	11.4%	11.4%	9.9%	9.8%	9.8%	9.6%	9.7%
Above \$75,000	Loan Originated	1,349	1,575	1,452	1,242	795	644	702	630	8,389
	Application Denied	93	130	149	131	77	49	46	45	720
	Denial Rate	6.4%	7.6%	9.3%	9.5%	8.8%	7.1%	6.1%	6.7%	7.9%
Data Missing	Loan Originated	168	116	146	53	17	15	20	13	548
	Application Denied	21	18	17	13	1	1	12	2	85
	Denial Rate	11.1%	13.4%	10.4%	19.7%	5.6%	6.3%	37.5%	13.3%	13.4%
Total	Loan Originated	3,723	3,961	3,388	2,705	1,856	1,667	1,642	1,462	20,404
	Application Denied	418	477	458	399	252	176	199	166	2,545
	Denial Rate	10.1%	10.7%	11.9%	12.9%	12.0%	9.5%	10.8%	10.2%	11.1%

Table 31.D.14
Loan Applications by Income and Race/Ethnicity of Applicant: Originated and Denied
 31. Medina 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	11	8	9	26	3	59
	Application Denied	0	2	3	2	2	2	0	11
	Denial Rate	%	50.0%	21.4%	20.0%	18.2%	7.1%	.0%	15.7%
Asian	Loan Originated	0	5	29	31	28	102	8	203
	Application Denied	1	4	3	11	5	16	1	41
	Denial Rate	100.0%	44.4%	9.4%	26.2%	15.2%	13.6%	11.1%	16.8%
Black	Loan Originated	0	5	22	32	47	73	10	189
	Application Denied	0	4	10	15	6	36	3	74
	Denial Rate	%	44.4%	31.3%	31.9%	11.3%	33.0%	23.1%	28.1%
White	Loan Originated	53	1,076	2,991	3,493	3,077	7,618	494	18,802
	Application Denied	44	250	451	423	308	570	61	2,107
	Denial Rate	45.4%	18.9%	13.1%	10.8%	9.1%	7.0%	11.0%	10.1%
Not Available	Loan Originated	2	40	139	180	183	561	32	1,137
	Application Denied	4	47	62	46	36	96	20	311
	Denial Rate	66.7%	54.0%	30.8%	20.4%	16.4%	14.6%	38.5%	21.5%
Not Applicable	Loan Originated	0	1	0	2	1	9	1	14
	Application Denied	0	0	0	0	1	0	0	1
	Denial Rate	%	.0%	%	.0%	50.0%	.0%	.0%	6.7%
Total	Loan Originated	55	1,129	3,192	3,746	3,345	8,389	548	20,404
	Application Denied	49	307	529	497	358	720	85	2,545
	Denial Rate	47.1%	21.4%	14.2%	11.7%	9.7%	7.9%	13.4%	11.1%
Non-Hispanic Ethnicity	Loan Originated	53	1,057	2,941	3,432	3,037	7,510	473	18,503
	Application Denied	42	249	450	432	300	607	63	2,143
	Denial Rate	44.2%	19.1%	13.3%	11.2%	9.0%	7.5%	11.8%	10.4%
Hispanic (Ethnicity)	Loan Originated	0	10	37	49	43	98	9	246
	Application Denied	0	4	6	14	14	12	0	50
	Denial Rate	%	28.6%	14.0%	22.2%	24.6%	10.9%	.0%	16.9%

PREDATORY LENDING

Table 31.D.15
Originated Owner-Occupied Loans by HAL Status
 31. Medina County
 2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Other	3,459	3,304	2,849	2,492	1,715	1,600	1,639	1,460	18,518
HAL	264	657	539	213	141	67	3	2	1,886
Total	3,723	3,961	3,388	2,705	1,856	1,667	1,642	1,462	20,404
Percent HAL	7.1%	16.6%	15.9%	7.9%	7.6%	4.0%	.2%	.1%	9.2%

Table 31.D.16
Loans by Loan Purpose by HAL Status
 31. Medina County
 2004–2011 HMDA Data

Loan Purpose		2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	Other	3,459	3,304	2,849	2,492	1,715	1,600	1,639	1,460	18,518
	HAL	264	657	539	213	141	67	3	2	1,886
	Percent HAL	7.1%	16.6%	15.9%	7.9%	7.6%	4.0%	.2%	.1%	9.2%
Home Improvement	Other	366	439	417	402	291	112	138	178	2,343
	HAL	79	97	91	75	32	24	15	2	415
	Percent HAL	17.8%	18.1%	17.9%	15.7%	9.9%	17.6%	9.8%	1.1%	15.0%
Refinancing	Other	3,707	2,857	2,253	1,814	1,679	3,679	3,858	3,174	23,021
	HAL	529	914	811	403	154	152	19	23	3,005
	Percent HAL	12.5%	24.2%	26.5%	18.2%	8.4%	4.0%	.5%	.7%	11.5%
Total	Other	7,532	6,600	5,519	4,708	3,685	5,391	5,635	4,812	43,882
	HAL	872	1,668	1,441	691	141	67	3	2	5,306
	Percent HAL	10.4%	20.2%	20.7%	12.8%	8.2%	4.3%	.7%	.6%	10.8%

Table 31.D.17
HALs Originated by Race of Borrower
 31. Medina County
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	1	5	1	0	0	0	0	0	7
Asian	2	5	2	0	0	0	0	0	9
Black	4	9	18	5	2	0	0	0	38
White	233	539	456	194	132	65	2	2	1,623
Not Available	24	99	62	14	7	2	1	0	209
Not Applicable	0	0	0	0	0	0	0	0	0
Total	264	657	539	213	141	67	3	2	1,886
Hispanic (Ethnicity)	5	8	11	6	3	1	0	0	34

Table 31.D.18
Rate of HALs Originated by Race/Ethnicity of Borrower
 31. Medina County
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	11.1%	45.5%	10.0%	.0%	.0%	.0%	.0%	.0%	11.9%
Asian	5.6%	11.6%	6.5%	.0%	.0%	.0%	.0%	.0%	4.4%
Black	13.3%	23.1%	40.9%	16.1%	16.7%	.0%	.0%	.0%	20.1%
White	6.8%	14.8%	14.7%	7.7%	7.6%	4.2%	.1%	.1%	8.6%
Not Available	12.0%	44.8%	30.7%	10.6%	8.9%	2.0%	.8%	.0%	18.4%
Not Applicable	.0%	.0%	.0%	%	.0%	.0%	%	%	0%
Average	7.1%	16.6%	15.9%	7.9%	7.6%	4.0%	0.2%	0.1%	9.2%
Non-Hispanic Ethnicity	6.8%	14.7%	15.0%	7.7%	7.4%	4.1%	.1%	.1%	8.7%
Hispanic (Ethnicity)	11.6%	19.0%	22.9%	16.7%	12.5%	4.8%	.0%	.0%	13.8%

Table 31.D.19
Loans by HAL Status by Race/Ethnicity of Borrower
 31. Medina County
 2004–2011 HMDA Data

Race	Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Other	8	6	9	3	4	9	6	7	52
	HAL	1	5	1	0	0	0	0	0	7
	Percent HAL	11.1%	45.5%	10.0%	.0%	.0%	.0%	.0%	.0%	11.9%
Asian	Other	34	38	29	32	20	15	13	13	194
	HAL	2	5	2	0	0	0	0	0	9
	Percent HAL	5.6%	11.6%	6.5%	.0%	.0%	.0%	.0%	.0%	4.4%
Black	Other	26	30	26	26	10	10	15	8	151
	HAL	4	9	18	5	2	0	0	0	38
	Percent HAL	13.3%	23.1%	40.9%	16.1%	16.7%	.0%	.0%	.0%	20.1%
White	Other	3,207	3,107	2,642	2,313	1,608	1,468	1,486	1,348	17,179
	HAL	233	539	456	194	132	65	2	2	1,623
	Percent HAL	6.8%	14.8%	14.7%	7.7%	7.6%	4.2%	0.1%	0.1%	8.6%
Not Available	Other	176	122	140	118	72	97	119	84	928
	HAL	24	99	62	14	7	2	1	0	209
	Percent HAL	12.0%	44.8%	30.7%	10.6%	8.9%	2.0%	.8%	.0%	18.4%
Not Applicable	Other	8	1	3	0	1	1	0	0	14
	HAL	0	0	0	0	0	0	0	0	0
	Percent HAL	.0%	.0%	.0%	%	.0%	.0%	%	%	0.0%
Total	Other	3,459	3,304	2,849	2,492	1,715	1,600	1,639	1,460	18,518
	HAL	264	657	539	213	141	67	3	2	1,886
	Percent HAL	7.1%	16.6%	15.9%	7.9%	7.6%	4.0%	.2%	.1%	9.2%
Non-Hispanic Ethnicity	Other	2,822	3,127	2,672	2,338	1,614	1,468	1,505	1,352	16,898
	HAL	206	538	471	194	129	63	2	2	1,605
	Percent HAL	6.8%	14.7%	15.0%	7.7%	7.4%	4.1%	.1%	.1%	8.7%
Hispanic (Ethnicity)	Other	38	34	37	30	21	20	15	17	212
	HAL	5	8	11	6	3	1	0	0	34
	Percent HAL	11.6%	19.0%	22.9%	16.7%	12.5%	4.8%	.0%	.0%	13.8%

Table 31.D.20
Rates of HALs by Income of Borrower
 31. Medina County
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Average
\$15,000 or Below	9.1%	12.5%	12.5%	.0%	33.3%	33.3%	.0%	.0%	12.7%
\$15,001–\$30,000	11.4%	14.9%	23.1%	15.2%	12.6%	7.0%	.9%	.0%	11.7%
\$30,001–\$45,000	10.5%	23.7%	17.3%	9.3%	9.8%	4.6%	.4%	.0%	11.6%
\$45,001–\$60,000	10.2%	20.2%	15.3%	8.4%	9.8%	3.7%	.3%	.0%	10.6%
\$60,001–\$75,000	6.1%	15.9%	18.6%	8.5%	8.5%	5.0%	.0%	.0%	10.0%
Above \$75,000	3.9%	12.8%	12.5%	5.8%	4.7%	3.0%	0.0%	.3%	6.7%
Data Missing	5.4%	14.7%	30.1%	18.9%	5.9%	.0%	.0%	.0%	14.8%
Average	7.1%	16.6%	15.9%	7.9%	7.6%	4.0%	.2%	.1%	9.2%

Table 31.D.21
Loans by HAL Status by Income of Borrower
 31. Medina County
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Other	10	14	7	5	4	2	2	4	48
	HAL	1	2	1	0	2	1	0	0	7
	Percent HAL	9.1%	12.5%	12.5%	.0%	33.3%	33.3%	.0%	.0%	12.7%
\$15,001–\$30,000	Other	179	166	120	123	90	107	114	98	997
	HAL	23	29	36	22	13	8	1	0	132
	Percent HAL	11.4%	14.9%	23.1%	15.2%	12.6%	7.0%	.9%	.0%	11.7%
\$30,001–\$45,000	Other	552	469	388	312	268	314	275	245	2,823
	HAL	65	146	81	32	29	15	1	0	369
	Percent HAL	10.5%	23.7%	17.3%	9.3%	9.8%	4.6%	.4%	.0%	11.6%
\$45,001–\$60,000	Other	635	589	497	428	322	309	304	264	3,348
	HAL	72	149	90	39	35	12	1	0	398
	Percent HAL	10.2%	20.2%	15.3%	8.4%	9.8%	3.7%	.3%	.0%	10.6%
\$60,001–\$75,000	Other	628	594	464	411	257	228	222	208	3,012
	HAL	41	112	106	38	24	12	0	0	333
	Percent HAL	6.1%	15.9%	18.6%	8.5%	8.5%	5.0%	.0%	.0%	10.0%
Above \$75,000	Other	1,296	1,373	1,271	1,170	758	625	702	628	7,823
	HAL	53	202	181	72	37	19	0	2	566
	Percent HAL	3.9%	12.8%	12.5%	5.8%	4.7%	3.0%	.0%	.3%	6.7%
Data Missing	Other	159	99	102	43	16	15	20	13	467
	HAL	9	17	44	10	1	0	0	0	81
	Percent HAL	5.4%	14.7%	30.1%	18.9%	5.9%	.0%	.0%	.0%	14.8%
Total	Other	3,459	3,304	2,849	2,492	1,715	1,600	1,639	1,460	18,518
	HAL	264	657	539	213	141	67	3	2	1,886
	Percent HAL	7.1%	16.6%	15.9%	7.9%	7.6%	4.0%	.2%	.1%	9.2%

E. CRA DATA

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

Table 31.E.1
Small Business Loans Originated: \$100,000 or Less by Tract MFI
 31. Medina 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		99	1,117	1,155		2,371
2001		132	1,332	1,278		2,742
2002		190	1,653	1,455		3,298
2003			1,638	1,898		3,536
2004			1,763	1,872		3,635
2005			1,887	2,194		4,081
2006			2,493	3,061		5,554
2007			2,749	3,504		6,253
2008			1,948	2,665		4,613
2009			896	1,226		2,122
2010			807	1,123		1,930
2011			1,012	1,486		2,498
Total	0	421	19,295	22,917	0	42,633
Loan Amount (\$1,000s)						
2000		1,542	16,119	15,519		33,180
2001		1,609	20,112	19,717		41,438
2002		1,593	21,529	18,805		41,927
2003			17,388	21,330		38,718
2004			20,493	21,241		41,734
2005			22,202	25,782		47,984
2006			25,711	32,448		58,159
2007			28,019	39,325		67,344
2008			19,042	27,469		46,511
2009			10,394	14,200		24,594
2010			9,967	14,121		24,088
2011			13,215	20,958		34,173
Total	0	4,744	224,191	270,915	0	499,850

Table 31.E.2
Small Business Loans Originated: \$100,001 to \$250,000 by Tract MFI
 31. Medina 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		6	60	48		114
2001		11	95	80		186
2002		12	85	79		176
2003			65	97		162
2004			72	76		148
2005			63	78		141
2006			71	80		151
2007			66	83		149
2008			30	61		91
2009			23	38		61
2010			25	60		85
2011			34	57		91
Total	0	29	689	837	0	1,555
Loan Amount (\$1,000s)						
2000		1,113	10,856	8,510		20,479
2001		1,898	16,930	14,465		33,293
2002		1,975	15,199	13,444		30,618
2003			11,540	17,589		29,129
2004			12,354	13,782		26,136
2005			10,692	13,968		24,660
2006			12,201	14,248		26,449
2007			11,244	14,062		25,306
2008			5,523	10,820		16,343
2009			3,886	6,018		9,904
2010			3,953	10,129		14,082
2011			5,576	9,972		15,548
Total	0	4,986	119,954	147,007	0	271,947

Table 31.E.3
Small Business Loans Originated: More than \$250,000 by Tract MFI
 31. Medina 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		5	63	42		110
2001		13	97	48		158
2002		16	91	68		175
2003			87	97		184
2004			86	89		175
2005			61	94		155
2006			60	72		132
2007			69	80		149
2008			43	59		102
2009			35	32		67
2010			50	60		110
2011			44	72		116
Total	0	34	786	813	0	1,633
Loan Amount (\$1,000s)						
2000		2,070	35,149	20,923		58,142
2001		6,554	48,763	26,242		81,559
2002		8,281	49,090	35,191		92,562
2003			44,314	51,737		96,051
2004			42,928	48,606		91,534
2005			31,135	53,431		84,566
2006			30,806	40,157		70,963
2007			37,305	41,453		78,758
2008			21,613	32,579		54,192
2009			18,381	18,074		36,455
2010			25,922	33,376		59,298
2011			22,451	40,758		63,209
Total	0	16,905	407,857	442,527	0	867,289

Table 31.E.4
Small Business Loans to Businesses with Gross Annual Revenues of Less Than \$1 Million by Tract MFI
 31. Medina 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		53	494	484		1,031
2001		73	637	609		1,319
2002		47	505	473		1,025
2003			525	591		1,116
2004			570	590		1,160
2005			916	980		1,896
2006			1,030	1,118		2,148
2007			1,131	1,290		2,421
2008			647	840		1,487
2009			315	471		786
2010			323	414		737
2011			458	668		1,126
Total	0	173	7,551	8,528	0	16,252
Loan Amount (\$1,000s)						
2000		2,342	22,429	23,074		47,845
2001		6,614	27,899	36,137		70,650
2002		4,085	30,466	32,968		67,519
2003			25,735	28,506		54,241
2004			23,185	28,129		51,314
2005			25,060	34,924		59,984
2006			24,047	30,135		54,182
2007			26,642	32,459		59,101
2008			13,811	23,811		37,622
2009			7,327	12,581		19,908
2010			9,890	15,102		24,992
2011			13,789	23,753		37,542
Total	0	13,041	250,280	321,579	0	584,900

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 31.F.1
Fair Housing Complaints by Basis
31. Medina County
2004–2012 HUD Data

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

Table 31.F.2
Fair Housing Complaints by Issue
31. Medina County
2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Failure to make reasonable accommodation	3		2		1	1		1		8
Discriminatory acts under Section 818 (coercion, etc.)	3	2			1	1				7
Discriminatory advertisement - rental						5				5
Discriminatory terms, conditions, privileges, or services and facilities	1		1			2		1		5
Discriminatory advertising, statements, and notices	2								1	3
Non-compliance with design and construction requirements (handicap)	1		2							3
Discriminatory refusal to sell and negotiate for sale			2							2
Discriminatory refusal to rent and negotiate for rental	1			1						2
False denial or representation of availability - rental						2				2
Discriminatory refusal to rent	3	1	5		1	2			1	13
Discrimination in terms, conditions or privileges relating to rental	1	2	5		1	1		2		12
Discrimination in terms, conditions, privileges relating to sale			1							1
Discrimination in services and facilities relating to rental					1					1
Otherwise deny or make housing available						1				1
Other discriminatory acts	1									1
Using ordinances to discriminate in zoning and land use					1					1
Failure to provide an accessible building entrance		1								1
Failure to permit reasonable modification		1								1
Total Issues	16	7	18	1	6	15	0	4	2	69
Total Complaints	11	5	14	2	5	12		4	1	54

Table 31.F.3
Fair Housing Complaints by Closure Status
 31. Medina County
 2004–2012 HUD Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Administrative Closure Cause (FHAP)	4	1	1	1		3		2		12
Conciliated / Settled	2		1	1		3		1		8
No Cause	3	3	7		2	4			1	20
	2	1	5		3	2		1		14
Total Complaints	11	5	14	2	5	12		4	1	54

HUD Complaints Found With Cause

Table 31.F.4
Fair Housing Complaints Found With Cause by Basis
 31. Medina County
 2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability	3	2	7	1	1	2				16
Family Status	3	1				5		1	1	11
Race	1		1		1					3
Total Bases	7	3	8	1	2	7		1	1	30
Total Complaints	5	3	8	1	2	7		1	1	28

Table 31.F.5
Fair Housing Complaints Found With Cause by Issue
 31. Medina County
 2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Discriminatory refusal to rent			2	1	2				1	6
Discrimination in terms, conditions or privileges relating to rental			1	1	1		1		1	5
Discriminatory advertisement - rental								4		4
Failure to make reasonable accommodation					2		1	1		4
Discriminatory terms, conditions, privileges, or services and facilities					1			2		3
Discriminatory refusal to sell and negotiate for sale					2					2
Discriminatory advertising, statements, and notices			1						1	2
False denial or representation of availability - rental								2		2
Discriminatory acts under Section 818 (coercion, etc.)						1				2
Discriminatory refusal to rent and negotiate for rental			1							1
Discrimination in terms, conditions, privileges relating to sale					1					1
Otherwise deny or make housing available								1		1
Other discriminatory acts			1							1
Non-compliance with design and construction requirements (handicap)			1							1
Failure to provide an accessible building entrance				1						1
Failure to permit reasonable modification				1						1
Total Issues	8	4	9	0	3	10	0	1	2	37
Total Complaints	5	3	8	1	2	7		1	1	28

OHIO CIVIL RIGHTS COMMISSION COMPLAINTS

Table 31.F.6
Fair Housing Complaints by Basis
 31. Medina County
 2004–2012 OCRRC Data

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

Table 31.F.7
Fair Housing Complaints by Issue
 31. Medina County
 2004–2012 OCRRC Data

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

Table 31.F.8
Fair Housing Complaints by Closure Status
 31. Medina County
 2004–2012 OCRRC 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	2	1								3
No Cause Finding Issued	7	2	5		2	3	1	1		21
No Jurisdiction			1				1			2
Settlement With Benefits	1	3	6		3	3	4	1	3	24
Successful Conciliation	1									1
Withdrawal With Benefits	2	1	2		1					6
Missing	2									2
Total Complaints	16	7	14	1	6	7	6	4	3	64

FAIR HOUSING CONTACT SERVICE COMPLAINTS

Table 31.F.9
Fair Housing Complaints by Basis
 31. Medina County
 2004–2012 FHCS Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
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Disability	2		7	2	1	1		1		14
Familial Status							3	2		5
National Origin			2				1			3
Race			3				1			4
Retaliation	1									1
Sex							2	2		4
Total Bases	3	0	12	2	1	1	7	5	0	31
Total Complaints	3		12	2	1	1	3	3		25

Table 31.F.10
Fair Housing Complaints by Closure Status
 31. Medina County
 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			2		1					3
No contact							1			1
No probable cause			2				2			4
Pending			2					1		3
Settled			3					1		4
Missing	3									3
Total Complaints	3	0	12	2	1	1	3	3	0	25

THE HOUSING RESEARCH AND ADVOCACY CENTER COMPLAINTS

Table 31.F.11
Fair Housing Complaints by Basis
 31 Medina County
 2004–2012 HRAC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability								1		1
Race								1		1
Total Bases	0	0	0	0	0	0	0	2	0	2
Total Complaints								1		1

Table 31.F.12
Fair Housing Complaints by Issue
 31 Medina County
 2004–2012 HRAC Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Rental								1		1
Total	0	0	0	0	0	0	0	1	0	1
Total Complaints								1		1

Table 31.F.13
Fair Housing Complaints by Action Taken
 31 Medina County
 2004–2012 HRAC Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Fair Housing Info Given								1		1
Referred to Attorney								1		1

Total	0	0	0	0	0	0	0	2	0	2
Total Complaints								1		1

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 31.G.1

Primary Role of Respondent

31. Medina County
2012–2013 Fair Housing Survey for Housing
Stakeholders Data

Primary Role	Total
Advocate/Service Provider	3
Local Government	2
Other Role	1
Total	6

FEDERAL, STATE, AND LOCAL LAWS

Table 31.G.2

**Familiarity with Fair
Housing Laws**

31. Medina County
2012–2013 Fair Housing Survey
for Housing Stakeholders Data

Familiarity	Total
Not Familiar	0
Somewhat Familiar	2
Very Familiar	1
Missing	3
Total	6

Table 31.G.3

Perceptions About Fair Housing Laws

31. Medina 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?	3			3	6
Are fair housing laws difficult to understand or follow?	1	1	1	3	6
Do you think fair housing laws should be changed?		1	2	3	6
Do you think fair housing laws are adequately enforced?	3			3	6

Table 31.G.4

Fair Housing Activities

31. Medina 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?	3			3	6	
Have you participated in fair housing training?	3			3	6	
Are you aware of any fair housing testing?		2	1	3	6	
Testing and education	Too Little	Right Amount	Too Much	Don't Know	Missing	Total
Is there sufficient outreach and education activity?	1	2			3	6

Is there sufficient testing?	3	3	6
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Table 31.G.5
Groups Identified as
Protected Classes

31. Medina County
2012–2013 Fair Housing Survey
for Housing Stakeholders Data

Protected Class	Total
Family Status	1
Religion	1
Gender	1
National Origin	1
Color	1
Military	1
Other	2
Total	9

Table 31.G.6
Fair Housing Violation Referrals
31. Medina County
2012–2013 Fair Housing Survey for
Housing Stakeholders Data

Referral	Total
Legal Aid	1
Medina County Fair Housing	2
OCRC	1
Total	4

LOCAL FAIR HOUSING

Table 31.G.7
Local Fair Housing
31. Medina 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		3	6
Are there any specific geographic areas that have fair housing problems?	1		2	3	6
Are there any specific groups in that face housing discrimination?	1	1	1	3	6

FAIR HOUSING IN THE PRIVATE SECTOR

Table 31.G.8
Barriers to Fair Housing in the Private Sector
31. Medina 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	1		3	6
The real estate industry?		3		3	6
The mortgage and home lending industry?		3		3	6
The housing construction or accessible housing design fields?	1	1	1	3	6
The home insurance industry?		3		3	6
The home appraisal industry?		3		3	6
Any other housing services?		2		4	6

FAIR HOUSING IN THE PUBLIC SECTOR

Table 31.G.9
Barriers to Fair Housing in the Public Sector
 31. Medina 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		3	6
Zoning laws?	2	1		3	6
Occupancy standards or health and safety codes?	1	1	1	3	6
Property tax policies?		2	1	3	6
Permitting process?		1	2	3	6
Housing construction standards?		1	2	3	6
Neighborhood or community development policies?			3	3	6
Limited access to government services, such as employment services?	3			3	6
Public administrative actions or regulations?			3	3	6

NARRATIVE COMMENTS

Federal, State, and Local Laws

Table 31.G.10
How did you become aware of fair housing laws?
 31. Medina County
 2013 Fair Housing Survey Data

Comments:
I am the Fair Housing Coordinator for the County Trainings and review of regulations

Local Fair Housing

Table 31.G.11
Are there any specific geographic areas that have fair housing problems?
 31. Medina County
 2013 Fair Housing Survey Data

Comments:
Suburbs have limited development through restrictive zoning

Table 31.G.12
Are there any specific groups in that face housing discrimination?
 31. Medina County
 2013 Fair Housing Survey Data

Comments:
Not so much discrimination as the ability to afford to live in the community. Affordable housing option are limited.

Table 31.G.13
Please share any additional comments.
 31. Medina County
 2013 Fair Housing Survey Data

Comments:
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.

Fair Housing in the Private Sector**Table 31.G.14****Are you aware of any questionable practices or barriers to fair housing choice in the rental housing market?**31. Medina County
2013 Fair Housing Survey Data

Comments:
Family status & marital status - refusing to rent to a single mom with children; other attempts to refuse to allow children. Zoning requirements for minimum square footage conflict with HUD requirements

Table 31.G.15**Are you aware of any questionable practices or barriers to fair housing choice in the housing construction or accessible housing design fields?**31. Medina County
2013 Fair Housing Survey Data

Comments:
Afordable housing not being built by developers

Table 31.G.16**Are you aware of any questionable practices or barriers to fair housing choice in any other housing services?**31. Medina County
2013 Fair Housing Survey Data

Comments:
Lack of low and moderate rental units

Fair Housing in the Public Sector**Table 31.G.17****Are you aware of any questionable practices or barriers to fair housing choice in land use policies?**31. Medina County
2013 Fair Housing Survey Data

Comments:
Land use for multi-family units is limited to 3 major cities There are townships that do not provide for multi-family housing at all.

Table 31.G.18**Are you aware of any questionable practices or barriers to fair housing choice in zoning laws?**31. Medina County
2013 Fair Housing Survey Data

Comments:
Often group homes are a "conditional use". Zoning laws restrict minimum square footage to large single family homes

Table 31.G.19**Are you aware of any questionable practices or barriers to fair housing choice in occupancy standards or health and safety codes?**31. Medina County
2013 Fair Housing Survey Data

Comments:
No ability to enforce health codes in rental properties

Table 31.G.20

Are you aware of any barriers that limit access to government services, such as a lack of transportation or employment services?

31. Medina County
2013 Fair Housing Survey Data

Comments:
Lack of transportation as well as the probability of reduced transportation due to budget cuts in public transportation
Limited public transportation.
No transportation levy in county so funds for transportation are quite limited

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 Medina County that received and completed the survey.²⁹

²⁹ 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 31.H.1
Housing Development
 31. Medina 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"?	1	0	1	3	5
Guidelines that encourage development affordable housing units?	0	2	0	3	5
Any potential barriers to the development of low- to moderate- income housing?	2	0	0	3	5
Guidelines that allow the development of mixed use housing?	0	1	1	3	5
Any potential barriers to the development of mixed use housing?	1	0	1	3	5
Occupancy Standards					
A definition for the term "family"?	1	0	1	3	5
Residential occupancy standards or limits?	0	2	0	3	5
Special Needs Housing					
A definition for the term "disability"?	0	0	1	4	5
Development standards for making housing accessible to persons with disabilities?	0	1	0	4	5
A process by which persons with disabilities can request modification to the jurisdiction's policies?	1	0	0	4	5
Standards for the development of senior housing?	0	1	0	4	5
Guidelines that distinguish senior citizen housing from other residential uses?	0	1	0	4	5
Guidelines for developing housing for any other special needs populations?	0	1	0	4	5
Fair Housing Policies					
A fair housing ordinance, policy, or regulation?	0	0	1	4	5
Policies or practices for "affirmatively furthering fair housing"?	0	1	0	4	5

I. IMPEDIMENTS

The 2013 Northeast Ohio Regional Analysis of Impediments to Fair Housing Choice uncovered several potential issues regarding fair housing in the Medina 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 Medina 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 Median County

Results of the Fair Housing Surveys indicate that a number of local communities in Medina County lack or do not have sufficient policies or practices that adequately address the duty to affirmatively further fair housing.

Suggestion: Construct a regional guidebook that lists a series of best practices that are appropriate for the communities in Northeast Ohio, both rural and suburban, 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, and Medina County has received accolades for its fair housing outreach, there still seems to be a lack of a sufficient fair housing outreach and education component to these advocacy efforts in Medina 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. 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 County 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. However, in Medina County, this impediment is on a much smaller scale.

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 in Medina County. 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 31.I.1
Impediments Matrix
 31. Medina 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 ³⁰			
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	Lack of inclusionary policies							X		X		All	M

³⁰ 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.

32. PORTAGE COUNTY

A. CENSUS BUREAU DATA

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

Table 32.A.1

Population by Age

32. Portage County

2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Under 5	9,297	6.1%	8,190	5.1%	-11.9%
5 to 19	34,006	22.4%	33,588	20.8%	-1.2%
20 to 24	14,600	9.6%	17,081	10.6%	17.0%
25 to 34	19,374	12.7%	17,724	11.0%	-8.5%
35 to 54	44,917	29.5%	44,123	27.3%	-1.8%
55 to 64	13,179	8.7%	19,894	12.3%	51.0%
65 or Older	16,688	11.0%	20,819	12.9%	24.8%
Total	152,061	100.0%	161,419	100.0%	6.2%

Table 32.A.2

Elderly Population by Age

32. Portage County

2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
65 to 66	2,103	12.6%	2,866	13.8%	36.3%
67 to 69	2,966	17.8%	3,906	18.8%	31.7%
70 to 74	4,402	26.4%	4,875	23.4%	10.7%
75 to 79	3,426	20.5%	3,819	18.3%	11.5%
80 to 84	2,115	12.7%	2,902	13.9%	37.2%
85 or Older	1,676	10.0%	2,451	11.8%	46.2%
Total	16,688	100.0%	20,819	100.0%	24.8%

Table 32.A.3

Population by Race and Ethnicity

32. Portage County

2000 & 2010 Census SF1 Data

Race	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
White	143,545	94.4%	148,936	92.3%	3.8%
Black	4,840	3.2%	6,687	4.1%	38.2%
American Indian	277	.2%	296	.2%	6.9%
Asian	1,246	.8%	2,305	1.4%	85.0%
Native Hawaiian/ Pacific Islander	20	.0%	40	.0%	100.0%
Other	328	.2%	413	.3%	25.9%
Two or More Races	1,805	1.2%	2,742	1.7%	51.9%
Total	152,061	100.0%	161,419	100.0%	6.2%
Non-Hispanic	150,968	99.3	159,346	98.7%	5.5%
Hispanic	1,093	.7%	2,073	1.3%	89.7%

Table 32.A.4
Disability by Age
 32. Portage 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%	64	1.6%	64	.8%
5 to 17	1,341	10.4%	546	4.4%	1,887	7.5%
18 to 34	1,370	6.7%	793	3.7%	2,163	5.1%
35 to 64	3,901	12.3%	3,976	12.3%	7,877	12.3%
65 to 74	1,520	28.4%	1,496	25.1%	3,016	26.6%
75 or Older	1,596	46.8%	2,660	56.6%	4,256	52.5%
Total	9,728	12.5%	9,535	11.7%	19,263	12.1%

Table 32.A.5
Employment Status by Disability and Type: Age 18 to 64
 32. Portage County
 2010 Three-Year ACS Data

Disability Status	Population
Employed:	75,485
With a disability:	3,800
With a hearing difficulty	1,772
With a vision difficulty	494
With a cognitive difficulty	794
With an ambulatory difficulty	1,016
With a self-care difficulty	132
With an independent living difficulty	478
No disability	71,685
Unemployed:	9,306
With a disability:	1,157
With a hearing difficulty	172
With a vision difficulty	263
With a cognitive difficulty	700
With an ambulatory difficulty	348
With a self-care difficulty	103
With an independent living difficulty	80
No disability	8,149
Not in labor force:	21,201
With a disability:	5,083
With a hearing difficulty	792
With a vision difficulty	638
With a cognitive difficulty	2,414
With an ambulatory difficulty	2,751
With a self-care difficulty	960
With an independent living difficulty	2,267
No disability	16,118
Total	105,992

Table 32.A.6**Households by Income**

32. Portage 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	7,584	13.4%	8,263	13.4%
\$15,000 to \$19,999	3,010	5.3%	3,354	5.4%
\$20,000 to \$24,999	3,757	6.7%	3,260	5.3%
\$25,000 to \$34,999	7,378	13.1%	6,409	10.4%
\$35,000 to \$49,999	10,104	17.9%	9,384	15.2%
\$50,000 to \$74,999	12,695	22.5%	11,989	19.4%
\$75,000 to \$99,999	6,350	11.3%	8,728	14.1%
\$100,000 or More	5,537	9.8%	10,432	16.9%
Total	56,415	100.0%	61,819	100.0%

Table 32.A.7**Poverty by Age**

32. Portage 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	1,427	10.7%	2,673	13.0%
6 to 17	2,171	16.2%	2,776	13.5%
18 to 64	8,887	66.3%	14,231	69.4%
65 or Older	910	6.8%	814	4.0%
Total	13,395	100.0%	20,494	100.0%
Poverty Rate	9.3%	.	13.5%	.

Table 32.A.8**Households by Year Home Built**

32. Portage 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	8,856	15.7%	9,097	14.7%
1940 to 1949	3,491	6.2%	2,779	4.5%
1950 to 1959	6,856	12.1%	7,132	11.5%
1960 to 1969	9,173	16.3%	7,551	12.2%
1970 to 1979	11,290	20.0%	10,895	17.6%
1980 to 1989	6,512	11.5%	6,639	10.7%
1990 to 1999	10,271	18.2%	9,703	15.7%
2000 to 2004	.	.	5,422	8.8%
2005 or Later	.	.	2,601	4.2%
Total	56,449	100.0%	61,819	100.0%

Table 32.A.9**Housing Units by Type**

32. Portage 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	40,900	68.1%	47,342	70.8%
Duplex	3,001	5.0%	3,013	4.5%
Tri- or Four-Plex	2,398	4.0%	2,426	3.6%
Apartment	8,247	13.7%	9,400	14.1%
Mobile Home	5,514	9.2%	4,679	7.0%
Boat, RV, Van, Etc.	36	.1%	0	.0%
Total	60,096	100.0%	66,860	100.0%

Table 32.A.10**Housing Units by Tenure**

32. Portage County

2000 & 2010 Census SF1 Data

Tenure	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
Occupied Housing Units	56,449	93.9%	62,222	92.2%	10.2%
Owner-Occupied	40,242	71.3%	43,479	69.9%	8.0%
Renter-Occupied	16,207	28.7%	18,743	30.1%	15.6%
Vacant Housing Units	3,647	6.1%	5,250	7.8%	44.0%
Total Housing Units	60,096	100.0%	67,472	100.0%	12.3%

Table 32.A.11**Disposition of Vacant Housing Units**

32. Portage County

2000 & 2010 Census SF1 Data

Disposition	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
For Rent	1,194	32.7%	1,916	36.5%	60.5%
For Sale	650	17.8%	864	16.5%	32.9%
Rented or Sold, Not Occupied	282	7.7%	349	6.6%	23.8%
For Seasonal, Recreational, or Occasional Use	680	18.6%	730	13.9%	7.4%
For Migrant Workers	6	0.2%	0	.0%	-100.0%
Other Vacant	835	22.9%	1,391	26.5%	66.6%
Total	3,647	100.0%	5,250	100.0%	44.0%

Table 32.A.12**Households by Household Size**

32. Portage County

2000 & 2010 Census SF1 Data

Size	2000 Census		2010 Census		% Change 00-10
	Households	% of Total	Households	% of Total	
One Person	13,151	23.3%	15,803	25.4%	20.2%
Two Persons	19,773	35.0%	22,741	36.5%	15.0%
Three Persons	9,791	17.3%	10,265	16.5%	4.8%
Four Persons	8,542	15.1%	8,166	13.1%	-4.4%
Five Persons	3,602	6.4%	3,549	5.7%	-1.5%
Six Persons	1,149	2.0%	1,178	1.9%	2.5%
Seven Persons or More	441	.8%	520	.8%	17.9%
Total	56,449	100.0%	62,222	100.0%	10.2%

Table 32.A.13
Household Type by Tenure
 32. Portage County
 2000 & 2010 Census SF1 Data

Household Type	2000 Census		2010 Census		% Change 00–10
	Households	% of Total	Households	% of Total	
Family Households	39,201	69.4%	40,757	65.5%	4.0%
Married-Couple Family	31,388	80.1%	31,165	76.5%	-.7%
Owner-Occupied	27,406	87.3%	27,622	88.6%	.8%
Renter-Occupied	3,982	12.7%	3,543	11.4%	-11.0%
Other Family	7,813	19.9%	9,592	23.5%	22.8%
Male Householder, No Spouse	2,102	26.9%	2,830	29.5%	34.6%
Owner-Occupied	1,378	65.6%	1,819	64.3%	32.0%
Renter-Occupied	724	34.4%	1,011	35.7%	39.6%
Female Householder, No Spouse	5,711	73.1%	6,762	70.5%	18.4%
Owner-Occupied	3,134	54.9%	3,516	52.0%	12.2%
Renter-Occupied	2,577	45.1%	3,246	48.0%	26.0%
Non-Family Households	17,248	30.6%	21,465	34.5%	24.4%
Owner-Occupied	8,324	48.3%	10,522	49.0%	26.4%
Renter-Occupied	8,924	51.7%	10,943	51.0%	22.6%
Total	56,449	100.0%	62,222	100.0%	10.2%

Table 32.A.14
Group Quarters Population
 32. Portage 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	157	14.8%	179	20.0%	14.0%
Juvenile Facilities	.	.	22	2.5%	.
Nursing Homes	741	69.8%	696	77.6%	-6.1%
Other Institutions	164	15.4%	0	.0%	-100.0%
Total	1,062	100.0%	897	100.0%	-15.5%
Noninstitutionalized					
College Dormitories	6,213	95.7%	6,792	96.8%	9.3%
Military Quarters	0	.0%	0	.0%	%
Other Noninstitutional	277	4.3%	225	3.2%	-18.8%
Total	6,490	85.9%	7,017	88.7%	8.1%
Total Group Quarters Population	7,552	100.0%	7,914	100.0%	4.8%

Table 32.A.15
Overcrowding and Severe Overcrowding
 32. Portage 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	39,950	99.3%	240	.6%	35	.1%	40,225
2010 ACS	42,545	99.6%	145	.3%	29	.1%	42,719
Renter							
2000 Census	15,782	97.3%	331	2.0%	111	.7%	16,224
2010 ACS	18,851	98.7%	206	1.1%	43	.2%	19,100
Total							
2000 Census	55,732	98.7%	571	1.0%	146	.3%	56,449
2010 ACS	61,396	99.3%	351	.6%	72	.1%	61,819

Table 32.A.16
Households with Incomplete Plumbing Facilities
 32. Portage County
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Plumbing Facilities	56,261	61,574
Lacking Complete Plumbing Facilities	188	245
Total Households	56,449	61,819
Percent Lacking	.3%	.4%

Table 32.A.17
Households with Incomplete Kitchen Facilities
 32. Portage County
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Kitchen Facilities	56,210	61,202
Lacking Complete Kitchen Facilities	239	617
Total Households	56,449	61,819
Percent Lacking	.4%	1.0%

Table 32.A.18
Cost Burden and Severe Cost Burden by Tenure
 32. Portage 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	17,650	77.5%	3,589	15.8%	1,455	6.4%	91	.4%	22,785
2010 ACS	20,075	67.4%	6,293	21.1%	3,354	11.3%	83	.3%	29,805
Owner Without a Mortgage									
2000 Census	7,855	90.6%	510	5.9%	242	2.8%	66	.8%	8,673
2010 ACS	10,810	83.7%	1,158	9.0%	811	6.3%	135	1.0%	12,914
Renter									
2000 Census	8,913	56.0%	3,056	19.2%	3,002	18.9%	938	5.9%	15,909
2010 ACS	8,274	43.3%	4,061	21.3%	5,434	28.5%	1,331	7.0%	19,100
Total									
2000 Census	34,418	72.7%	7,155	15.1%	4,699	9.9%	1,095	2.3%	47,367
2010 ACS	39,159	63.3%	11,512	18.6%	9,599	15.5%	1,549	2.5%	61,819

Table 32.A.19
Median Housing Costs
 32. Portage County
 2000 Census SF3 & 2010 Five-Year ACS Data

Housing Cost	2000 Census	2010 ACS
Median Contract Rent	\$469	\$622
Median Home Value	\$123,000	\$157,100

B. BEA DATA

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

Table 32.B.1
Employment by Industry
 32. Portage County
 Select Years 2001–2010 BEA Data

NAICS Categories	2001	2005	2006	2007	2008	2009	2010	% Change 01–10
Farm employment	1,133	971	954	951	893	901	894	-21.1%
Forestry, fishing, related activities, and other	(D) ³¹	195	185	190	201	183	187	%
Mining	437	562	588	610	687	742	735	68.2%
Utilities	(D)	18	(D)	40	(D)	(D)	(D)	%
Construction	4,423	4,648	4,620	4,555	4,403	3,965	3,754	-15.1%
Manufacturing	13,771	12,588	12,682	11,993	11,237	9,902	9,934	-27.9%
Wholesale trade	2,862	2,839	3,058	3,271	3,139	3,044	2,955	3.2%
Retail trade	7,270	7,556	7,313	7,610	8,018	7,613	7,573	4.2%
Transportation and warehousing	(D)	1,818	(D)	1,830	(D)	(D)	(D)	%
Information	763	632	658	652	632	554	499	-34.6%
Finance and insurance	1,346	1,443	1,499	1,673	1,760	1,981	2,053	52.5%
Real estate and rental and leasing	2,329	2,814	2,833	2,770	2,762	2,733	2,729	17.2%
Professional and technical services	2,565	3,126	3,092	3,070	3,346	3,093	3,100	20.9%
Management of companies and enterprises	420	576	811	824	867	867	934	122.4%
Administrative and waste services	2,251	2,831	2,998	2,962	2,811	2,669	2,889	28.3%
Educational services	1,271	1,394	1,354	1,310	1,334	1,387	1,436	13.0%
Health care and social assistance	3,793	4,145	4,239	4,617	4,890	4,886	4,879	28.6%
Arts, entertainment, and recreation	2,195	2,020	2,127	1,994	1,668	1,574	1,552	-29.3%
Accommodation and food services	4,762	5,005	4,895	5,090	5,041	5,104	5,088	6.8%
Other services, except public administration	3,991	4,408	4,339	4,383	4,267	4,054	3,942	-1.2%
Government and government enterprises	15,195	15,808	15,937	16,551	17,061	16,908	16,770	10.4%
Total	72,547	75,397	75,965	76,946	76,920	74,000	73,804	1.7%

³¹ (D): These data are not shown to avoid disclosure of confidential information, but estimates are included in the totals.

Table 32.B.2
Real Earnings by Industry

32. Portage County
 Select Years 2001–2010 BEA Data, Real 2011 Dollars

NAICS Categories	2001	2005	2006	2007	2008	2009	2010	% Change 00–10
Farm earnings	6,212	9,121	4,754	5,822	7,668	9,699	5,690	-8.4%
Forestry, fishing, related activities, and other	(D) ³²	4,156	3,976	3,369	2,507	2,086	2,092	%
Mining	15,240	29,857	31,281	31,246	45,764	28,576	32,011	110.0%
Utilities	(D)	416	(D)	2,552	(D)	(D)	(D)	%
Construction	196,880	193,234	199,897	179,209	160,433	142,919	138,900	-29.4%
Manufacturing	828,687	811,574	810,220	748,952	741,800	656,792	692,815	-16.4%
Wholesale trade	170,773	186,638	203,937	219,257	211,206	195,466	191,329	12.0%
Retail trade	213,677	216,804	197,762	201,856	206,672	191,428	196,247	-8.2%
Transportation and warehousing	(D)	92,337	(D)	77,577	(D)	(D)	(D)	%
Information	31,808	29,286	29,433	28,206	23,077	21,249	18,302	-42.5%
Finance and insurance	45,993	71,846	69,943	69,222	58,514	60,499	60,642	31.9%
Real estate and rental and leasing	45,348	36,083	40,598	32,121	50,239	57,114	63,223	39.4%
Professional and technical services	79,495	109,787	112,884	104,508	117,926	102,819	112,200	41.1%
Management of companies and enterprises	23,755	30,101	50,704	51,867	61,786	49,488	58,694	147.1%
Administrative and waste services	46,399	61,548	61,791	63,387	63,236	62,677	73,783	59.0%
Educational services	26,727	29,395	30,283	31,789	32,585	31,528	33,365	24.8%
Health care and social assistance	135,008	146,993	151,125	164,458	175,956	172,199	169,709	25.7%
Arts, entertainment, and recreation	45,670	33,928	35,125	32,378	20,568	19,872	18,693	-59.1%
Accommodation and food services	74,221	78,985	78,611	83,245	80,902	82,163	84,161	13.4%
Other services, except public administration	110,680	130,630	122,988	127,589	122,824	115,215	113,633	2.7%
Government and government enterprises	722,751	820,041	804,561	811,275	833,666	861,247	880,123	21.8%
Total	2,900,803	3,122,759	3,119,631	3,069,885	3,102,735	2,940,430	3,027,520	4.4%

³² (D): These data are not shown to avoid disclosure of confidential information, but estimates are included in the totals.

Table 32.B.3
Real Earnings Per Job by Industry
 32. Portage 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	5,483	9,393	4,983	6,122	8,587	10,764	6,365	16.1%
Forestry, fishing, related activities, and other	(D) ³³	21,312	21,494	17,732	12,471	11,398	11,186	%
Mining	34,874	53,126	53,200	51,224	66,615	38,512	43,552	24.9%
Utilities	(D)	23,113	(D)	63,789	(D)	(D)	(D)	%
Construction	44,513	41,574	43,268	39,343	36,437	36,045	37,000	-16.9%
Manufacturing	60,176	64,472	63,887	62,449	66,014	66,329	69,742	15.9%
Wholesale trade	59,669	65,741	66,690	67,031	67,284	64,213	64,748	8.5%
Retail trade	29,392	28,693	27,043	26,525	25,776	25,145	25,914	-11.8%
Transportation and warehousing	(D)	50,790	(D)	42,392	(D)	(D)	(D)	%
Information	41,688	46,338	44,731	43,261	36,514	38,355	36,678	-12.0%
Finance and insurance	34,170	49,789	46,660	41,376	33,246	30,540	29,538	-13.6%
Real estate and rental and leasing	19,471	12,823	14,330	11,596	18,189	20,898	23,167	19.0%
Professional and technical services	30,992	35,121	36,509	34,042	35,244	33,243	36,193	16.8%
Management of companies and enterprises	56,560	52,258	62,520	62,945	71,264	57,079	62,841	11.1%
Administrative and waste services	20,613	21,741	20,611	21,400	22,496	23,483	25,539	23.9%
Educational services	21,029	21,086	22,366	24,266	24,426	22,731	23,235	10.5%
Health care and social assistance	35,594	35,463	35,651	35,620	35,983	35,243	34,783	-2.3%
Arts, entertainment, and recreation	20,806	16,796	16,514	16,238	12,331	12,625	12,044	-42.1%
Accommodation and food services	15,586	15,781	16,059	16,355	16,049	16,098	16,541	6.1%
Other services, except public administration	27,732	29,635	28,345	29,110	28,785	28,420	28,826	3.9%
Government and government enterprises	47,565	51,875	50,484	49,017	48,864	50,937	52,482	10.3%
Average	39,986	41,418	41,067	39,897	40,338	39,735	41,021	2.59%

³³ (D): These data are not shown to avoid disclosure of confidential information, but estimates are included in the totals.

Table 32.B.4
Total Employment and Real Personal Income
 32. Portage 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	1,273,101	71,437	687,232	193,139	109,330	2,191,365	17,809	37,323	34,113
1970	1,293,381	70,603	603,033	204,425	126,016	2,156,253	17,061	38,034	34,006
1971	1,254,734	69,953	621,494	214,390	146,357	2,167,021	16,826	36,841	34,056
1972	1,298,772	75,198	672,303	224,234	158,468	2,278,579	17,584	37,686	34,463
1973	1,386,553	93,099	718,877	237,048	167,209	2,416,589	18,413	40,153	34,533
1974	1,366,349	94,190	728,081	250,063	197,176	2,447,478	18,458	40,824	33,469
1975	1,264,591	83,468	696,763	245,759	272,254	2,395,899	18,048	39,805	31,770
1976	1,364,835	92,201	734,863	257,939	273,450	2,538,886	18,993	41,525	32,867
1977	1,397,692	95,749	859,018	278,147	257,979	2,697,088	20,210	42,842	32,625
1978	1,458,265	105,225	933,995	294,018	249,862	2,830,916	21,052	44,837	32,524
1979	1,488,684	113,087	968,168	312,132	273,205	2,929,102	21,817	46,308	32,146
1980	1,430,124	107,822	965,726	358,914	349,671	2,996,612	21,996	46,313	30,879
1981	1,416,644	114,667	935,546	405,319	322,616	2,965,458	21,573	46,339	30,571
1982	1,358,513	109,663	862,456	435,430	357,973	2,904,708	21,035	45,602	29,790
1983	1,404,177	118,198	839,546	455,906	375,974	2,957,404	21,380	45,932	30,570
1984	1,525,748	130,550	867,890	498,487	367,244	3,128,820	22,643	48,076	31,736
1985	1,557,895	135,935	880,372	517,547	380,350	3,200,230	23,201	49,421	31,522
1986	1,604,278	142,557	873,192	525,660	398,785	3,259,359	23,507	50,267	31,915
1987	1,706,328	155,019	839,493	524,270	409,131	3,324,203	23,872	52,714	32,370
1988	1,817,445	170,346	834,121	544,044	422,296	3,447,560	24,430	54,611	33,280
1989	1,864,361	179,093	852,082	594,910	444,586	3,576,845	25,143	56,157	33,198
1990	1,916,491	187,638	852,525	592,404	476,583	3,650,365	25,571	57,054	33,590
1991	1,931,658	193,346	848,250	593,418	481,168	3,661,148	25,428	57,963	33,326
1992	2,055,625	205,698	845,580	590,959	529,876	3,816,341	26,219	59,166	34,743
1993	2,114,818	216,077	897,350	607,984	546,678	3,950,753	27,110	60,543	34,931
1994	2,233,356	231,938	965,985	660,092	551,331	4,178,826	28,526	63,345	35,258
1995	2,364,549	251,239	957,876	668,076	580,917	4,320,180	29,211	66,327	35,651
1996	2,442,277	257,493	920,533	699,252	583,721	4,388,290	29,394	67,781	36,032
1997	2,619,154	267,738	901,948	782,827	602,697	4,638,888	30,935	70,787	37,000
1998	2,757,519	270,846	964,448	827,568	612,469	4,891,158	32,523	70,794	38,951
1999	2,849,796	279,975	1,000,557	823,430	619,281	5,013,091	33,115	71,710	39,741
2000	2,851,331	271,882	1,103,827	840,614	658,415	5,182,305	33,982	72,369	39,400
2001	2,900,803	277,859	986,741	761,439	718,724	5,089,847	33,147	72,547	39,986
2002	2,985,242	272,313	971,408	715,949	766,452	5,166,738	33,406	72,236	41,326
2003	3,045,913	281,528	1,017,517	716,446	788,493	5,286,841	33,896	73,516	41,432
2004	3,069,030	292,554	1,046,182	676,495	803,736	5,302,889	33,825	74,581	41,151
2005	3,122,759	296,844	1,021,349	691,410	829,748	5,368,422	34,092	75,397	41,418
2006	3,119,631	302,988	1,076,186	747,014	856,908	5,496,749	34,839	75,965	41,067
2007	3,069,885	299,334	1,104,667	814,352	894,961	5,584,531	35,090	76,946	39,897
2008	3,102,735	308,809	1,087,728	828,827	964,706	5,675,188	35,430	76,920	40,338
2009	2,940,430	297,892	1,010,046	693,993	1,109,763	5,456,340	33,843	74,000	39,735
2010	3,027,520	302,724	1,046,808	700,241	1,164,624	5,636,468	34,927	73,804	41,021

C. BLS DATA

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

Table 32.C.1
Labor Force Statistics
 32. Portage County
 1990–2011 BLS Data

Year	Labor Force	Employment	Unemployment	Unemployment Rate	Statewide Unemployment Rate
1990	75,100	71,208	3,892	5.2%	5.7%
1991	76,101	71,638	4,463	5.9%	6.6%
1992	78,338	72,906	5,432	6.9%	7.4%
1993	78,882	74,244	4,638	5.9%	6.7%
1994	80,243	76,150	4,093	5.1%	5.6%
1995	81,080	77,665	3,415	4.2%	4.9%
1996	82,754	79,027	3,727	4.5%	5.0%
1997	82,292	78,893	3,399	4.1%	4.6%
1998	81,994	78,822	3,172	3.9%	4.3%
1999	83,002	79,669	3,333	4.0%	4.3%
2000	84,761	81,467	3,294	3.9%	4.0%
2001	84,828	81,220	3,608	4.3%	4.4%
2002	85,023	80,397	4,626	5.4%	5.7%
2003	86,527	81,507	5,020	5.8%	6.2%
2004	87,577	82,528	5,049	5.8%	6.1%
2005	89,083	84,144	4,939	5.5%	5.9%
2006	89,941	85,391	4,550	5.1%	5.4%
2007	91,255	86,425	4,830	5.3%	5.6%
2008	92,234	86,495	5,739	6.2%	6.5%
2009	92,222	83,083	9,139	9.9%	10.1%
2010	92,463	83,570	8,893	9.6%	10.0%
2011	91,043	83,474	7,569	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.³⁴ The information presented in this section presents detailed HMDA data, including denial rates and predatory lending including high annual percentage rate (APR) loans.

Table 32.D.1
Purpose of Loan by Year
32. Portage County
2004–2011 HMDA Data

Purpose	2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	4,627	5,360	5,148	3,821	2,476	2,252	2,147	2,028	27,859
Home Improvement	1,129	1,235	1,192	1,017	679	361	264	261	6,138
Refinancing	9,655	9,189	8,208	6,081	4,113	5,850	5,137	4,458	52,691
Total	15,411	15,784	14,548	10,919	7,268	8,463	7,548	6,747	86,688

Table 32.D.2
Occupancy Status for Home Purchase Loan Applications
32. Portage County
2004–2011 HMDA Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	Total
Owner-Occupied	4,229	4,916	4,670	3,506	2,266	2,169	2,050	1,897	25,703
Not Owner-Occupied	329	382	426	261	192	78	91	126	1,885
Not Applicable	69	62	52	54	18	5	6	5	271
Total	4,627	5,360	5,148	3,821	2,476	2,252	2,147	2,028	27,859

Table 32.D.3
Owner-Occupied Home Purchase Loan Applications by Loan Type
32. Portage County
2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Conventional	3,896	4,564	4,292	3,078	1,383	883	840	866	19,802
FHA - Insured	287	267	295	340	816	1,051	1,004	798	4,858
VA - Guaranteed	39	79	80	83	54	107	132	102	676
Rural Housing Service or Farm Service Agency	7	6	3	5	13	128	74	131	367
Total	4,229	4,916	4,670	3,506	2,266	2,169	2,050	1,897	25,703

³⁴ 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 32.D.4
Loan Applications by Action Taken
 32. Portage County
 2004–2011 HMDA Data

Action	2004	2005	2006	2007	2008	2009	2010	2011	Total
Loan Originated	2,317	2,665	2,573	1,902	1,232	1,091	1,012	934	13,726
Application Approved but not Accepted	290	312	265	215	114	59	46	50	1,351
Application Denied	503	598	522	415	242	179	187	176	2,822
Application Withdrawn by Applicant	256	319	291	175	135	110	102	91	1,479
File Closed for Incompleteness	96	88	75	59	18	23	21	22	402
Loan Purchased by the Institution	767	931	943	740	525	706	682	624	5,918
Preapproval Request Denied	0	3	1	0	0	1	0	0	5
Preapproval Approved but not Accepted	0	0	0	0	0	0	0	0	0
Total	4,229	4,916	4,670	3,506	2,266	2,169	2,050	1,897	25,703
Denial Rate	17.8%	18.3%	16.9%	17.9%	16.4%	14.1%	15.6%	15.9%	17.1%

Table 32.D.5
Denial Rates by Gender of Applicant
 32. Portage County
 2004–2011 HMDA Data

Year	Male	Female	Not Available	Not Applicable	Average
2004	15.3%	20.9%	42.6%	.0%	17.8%
2005	14.8%	26.3%	33.0%	.0%	18.3%
2006	15.1%	19.1%	37.0%	.0%	16.9%
2007	14.9%	23.0%	40.6%	.0%	17.9%
2008	14.4%	18.9%	34.5%	.0%	16.4%
2009	13.1%	14.2%	34.1%	%	14.1%
2010	13.7%	21.0%	14.3%	%	15.6%
2011	12.9%	20.0%	36.7%	%	15.9%
Average	14.6%	21.1%	35.1%	.0%	17.1%

Table 32.D.6
Loan Applications by Selected Action Taken by Gender of Applicant
 32. Portage County
 2004–2011 HMDA Data

Gender		2004	2005	2006	2007	2008	2009	2010	2011	Total
Male	Originated	1,651	1,972	1,827	1,358	860	761	719	663	9,811
	Denied	298	343	324	238	145	115	114	98	1,675
	Denial Rate	15.3%	14.8%	15.1%	14.9%	14.4%	13.1%	13.7%	12.9%	14.6%
Female	Originated	603	631	682	500	335	303	245	240	3,539
	Denied	159	225	161	149	78	50	65	60	947
	Denial Rate	20.9%	26.3%	19.1%	23.0%	18.9%	14.2%	21.0%	20.0%	21.1%
Not Available	Originated	62	61	63	41	36	27	48	31	369
	Denied	46	30	37	28	19	14	8	18	200
	Denial Rate	42.6%	33.0%	37.0%	40.6%	34.5%	34.1%	14.3%	36.7%	35.1%
Not Applicable	Originated	1	1	1	3	1	0	0	0	7
	Denied	0	0	0	0	0	0	0	0	0
	Denial Rate	.0%	.0%	.0%	.0%	.0%	%	%	%	.0%
Total	Originated	2,317	2,665	2,573	1,902	1,232	1,091	1,012	934	13,726
	Denied	503	598	522	415	242	179	187	176	2,822
	Denial Rate	17.8%	18.3%	16.9%	17.9%	16.4%	14.1%	15.6%	15.9%	17.1%

Table 32.D.7
Denial Rates by Race/Ethnicity of Applicant
 32. Portage County
 2004–2011 HMDA Data

Race/Ethnicity	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	.0%	50.0%	.0%	44.4%	66.7%	.0%	.0%	.0%	25.7%
Asian	7.1%	16.2%	26.3%	4.8%	30.4%	17.6%	26.1%	22.2%	18.9%
Black	25.3%	32.4%	27.9%	37.0%	33.3%	25.0%	36.4%	23.3%	30.6%
White	16.3%	16.8%	14.8%	15.5%	14.0%	13.0%	14.7%	14.1%	15.3%
Not Available	35.5%	30.6%	35.3%	40.0%	37.4%	28.1%	16.7%	37.1%	33.5%
Not Applicable	20.0%	.0%	.0%	.0%	.0%	0%	0%	%	10.0%
Average	17.8%	18.3%	16.9%	17.9%	16.4%	14.1%	15.6%	15.9%	17.1%
Non-Hispanic	15.8%	16.9%	15.3%	16.5%	15.3%	13.4%	15.5%	14.7%	15.7%
Hispanic	31.4%	43.3%	23.3%	14.3%	14.3%	.0%	9.1%	11.1%	24.5%

Table 32.D.8
Loan Applications by Selected Action Taken by Race/Ethnicity of Applicant
 32. Portage County
 2004–2011 HMDA Data

Race		2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Originated	2	3	8	5	1	2	4	1	26
	Denied	0	3	0	4	2	0	0	0	9
	Denial Rate	.0%	50.0%	.0%	44.4%	66.7%	.0%	.0%	.0%	25.7%
Asian	Originated	26	31	28	20	16	14	17	7	159
	Denied	2	6	10	1	7	3	6	2	37
	Denial Rate	7.1%	16.2%	26.3%	4.8%	30.4%	17.6%	26.1%	22.2%	18.9%
Black	Originated	59	75	106	68	32	27	21	23	411
	Denied	20	36	41	40	16	9	12	7	181
	Denial Rate	25.3%	32.4%	27.9%	37.0%	33.3%	25.0%	36.4%	23.3%	30.6%
White	Originated	2,097	2,405	2,300	1,726	1,125	1,007	905	859	12,424
	Denied	409	487	400	316	183	151	156	141	2,243
	Denial Rate	16.3%	16.8%	14.8%	15.5%	14.0%	13.0%	14.7%	14.1%	15.3%
Not Available	Originated	129	150	130	81	57	41	65	44	697
	Denied	71	66	71	54	34	16	13	26	351
	Denial Rate	35.5%	30.6%	35.3%	40.0%	37.4%	28.1%	16.7%	37.1%	33.5%
Not Applicable	Originated	4	1	1	2	1	0	0	0	9
	Denied	1	0	0	0	0	0	0	0	1
	Denial Rate	35.5%	30.6%	35.3%	40.0%	37.4%	28.1%	16.7%	37.1%	10.0%
Total	Originated	2,317	2,665	2,573	1,902	1,232	1,091	1,012	934	13,726
	Denied	503	598	522	415	242	179	187	176	2,822
	Denial Rate	17.8%	18.3%	16.9%	17.9%	16.4%	14.1%	15.6%	15.9%	17.1%
Non-Hispanic	Originated	1,954	2,486	2,420	1,804	1,152	1,038	937	880	12,671
	Denied	367	504	436	356	208	161	172	152	2,356
	Denial Rate	15.8%	16.9%	15.3%	16.5%	15.3%	13.4%	15.5%	14.7%	15.7%
Hispanic	Originated	24	17	23	12	12	8	10	8	114
	Denied	11	13	7	2	2	0	1	1	37
	Denial Rate	31.4%	43.3%	23.3%	14.3%	14.3%	.0%	9.1%	11.1%	24.5%

Table 32.D.9
Loan Applications by Reason for Denial
 32. Portage County
 2004–2011 HMDA Data

Denial Reason	2004	2005	2006	2007	2008	2009	2010	2011	Total
Debt-to-Income Ratio	54	86	72	58	52	32	44	31	429
Employment History	6	12	11	11	8	1	5	3	57
Credit History	126	134	96	93	69	52	49	43	662
Collateral	33	49	59	46	33	26	36	46	328
Insufficient Cash	12	18	3	8	3	1	4	5	54
Unverifiable Information	2	11	15	18	3	7	4	6	66
Credit Application Incomplete	40	43	33	37	14	16	16	22	221
Mortgage Insurance Denied	0	0	0	0	0	1	1	0	2
Other	72	110	93	53	12	12	15	6	373
Missing	158	135	140	91	48	31	13	14	630
Total	503	598	522	415	242	179	187	176	2,822

Table 32.D.10
Denial Rates by Income of Applicant
 32. Portage County
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	57.1%	66.7%	43.8%	60.0%	66.7%	70.0%	80.0%	57.1%	61.3%
\$15,001–\$30,000	36.7%	42.7%	26.7%	36.5%	34.0%	21.5%	34.1%	22.9%	33.3%
\$30,001–\$45,000	22.1%	21.2%	21.9%	20.8%	19.8%	18.6%	16.7%	20.3%	20.7%
\$45,001–\$60,000	16.4%	15.0%	15.3%	15.6%	16.5%	9.1%	14.7%	17.8%	15.2%
\$60,001–\$75,000	8.3%	13.8%	14.1%	15.0%	11.3%	9.4%	8.5%	11.1%	12.1%
Above \$75,000	9.8%	11.1%	13.5%	11.8%	9.4%	10.2%	10.1%	10.4%	11.2%
Data Missing	25.3%	17.9%	11.9%	30.0%	23.1%	55.6%	60.0%	27.3%	21.3%
Total	17.8%	18.3%	16.9%	17.9%	16.4%	14.1%	15.6%	15.9%	17.1%

Table 32.D.11
Denial Rates of Loans by Race/Ethnicity and Income of Applicant
 32. Portage County
 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%	21.4%	42.9%	.0%	.0%	100.0%	25.7%
Asian	100.0%	23.1%	19.2%	31.7%	17.9%	9.8%	25.0%	18.9%
Black	66.7%	54.8%	28.6%	30.0%	26.5%	31.5%	5.0%	30.6%
White	56.5%	31.1%	19.0%	13.7%	10.6%	9.1%	18.8%	15.3%
Not Available	80.0%	57.1%	42.3%	24.5%	23.6%	23.4%	53.1%	33.5%
Not Applicable	%	.0%	%	100.0%	.0%	.0%	.0%	10.0%
Average	61.3%	33.3%	20.7%	15.2%	12.1%	11.2%	21.3%	17.1%
Non-Hispanic Ethnicity	57.8%	30.6%	19.0%	14.3%	11.2%	10.5%	16.9%	15.7%
Hispanic (Ethnicity)	66.7%	56.5%	21.1%	25.7%	6.7%	11.4%	.0%	24.5%

Table 32.D.12
Loan Applications by Reason for Denial by Race/Ethnicity of Applicant
 32. Portage County
 2004–2011 HMDA Data

Denial Reason	American Indian	Asian	Black	White	Not Available	Not Applicable	Total	Hispanic (Ethnicity)
Debt-to-Income Ratio	0	14	28	329	58	0	429	3
Employment History	1	1	5	48	2	0	57	0
Credit History	0	3	45	542	72	0	662	8
Collateral	0	2	12	265	49	0	328	4
Insufficient Cash	0	3	3	43	5	0	54	0
Unverifiable Information	1	2	5	49	9	0	66	0
Credit Application Incomplete	1	4	15	178	23	0	221	1
Mortgage Insurance Denied	0	0	1	1	0	0	2	0
Other	2	6	30	277	57	1	373	4
Missing	4	2	37	511	76	0	630	17
Total	9	37	181	2,243	351	1	2,822	37
% Missing	44.4%	5.4%	20.4%	22.8%	21.7%	.0%	22.3%	45.9%

Table 32.D.13
Loan Applications by Income of Applicant: Originated and Denied
 32. Portage County
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Loan Originated	9	6	9	6	3	3	2	3	41
	Application Denied	12	12	7	9	6	7	8	4	65
	Denial Rate	57.1%	66.7%	43.8%	60.0%	66.7%	70.0%	80.0%	57.1%	61.3%
\$15,001–\$30,000	Loan Originated	205	201	209	148	99	139	87	101	1,189
	Application Denied	119	150	76	85	51	38	45	30	594
	Denial Rate	36.7%	42.7%	26.7%	36.5%	34.0%	21.5%	34.1%	22.9%	33.3%
\$30,001–\$45,000	Loan Originated	504	545	460	365	268	232	209	192	2,775
	Application Denied	143	147	129	96	66	53	42	49	725
	Denial Rate	22.1%	21.2%	21.9%	20.8%	19.8%	18.6%	16.7%	20.3%	20.7%
\$45,001–\$60,000	Loan Originated	532	548	519	374	243	250	197	157	2,820
	Application Denied	104	97	94	69	48	25	34	34	505
	Denial Rate	16.4%	15.0%	15.3%	15.6%	16.5%	9.1%	14.7%	17.8%	15.2%
\$60,001–\$75,000	Loan Originated	385	411	420	300	196	164	140	136	2,152
	Application Denied	35	66	69	53	25	17	13	17	295
	Denial Rate	8.3%	13.8%	14.1%	15.0%	11.3%	9.4%	8.5%	11.1%	12.1%
Above \$75,000	Loan Originated	614	885	860	681	413	299	375	337	4,464
	Application Denied	67	111	134	91	43	34	42	39	561
	Denial Rate	9.8%	11.1%	13.5%	11.8%	9.4%	10.2%	10.1%	10.4%	11.2%
Data Missing	Loan Originated	68	69	96	28	10	4	2	8	285
	Application Denied	23	15	13	12	3	5	3	3	77
	Denial Rate	25.3%	17.9%	11.9%	30.0%	23.1%	55.6%	60.0%	27.3%	21.3%
Total	Loan Originated	2,317	2,665	2,573	1,902	1,232	1,091	1,012	934	13,726
	Application Denied	503	598	522	415	242	179	187	176	2,822
	Denial Rate	17.8%	18.3%	16.9%	17.9%	16.4%	14.1%	15.6%	15.9%	17.1%

Table 32.D.14
Loan Applications by Income and Race/Ethnicity of Applicant: Originated and Denied
 32. Portage 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	11	4	2	7	0	26
	Application Denied	1	1	3	3	0	0	1	9
	Denial Rate	100.0%	33.3%	21.4%	42.9%	.0%	.0%	100.0%	25.7%
Asian	Loan Originated	0	10	21	28	23	74	3	159
	Application Denied	2	3	5	13	5	8	1	37
	Denial Rate	100.0%	23.1%	19.2%	31.7%	17.9%	9.8%	25.0%	18.9%
Black	Loan Originated	1	14	45	77	72	183	19	411
	Application Denied	2	17	18	33	26	84	1	181
	Denial Rate	66.7%	54.8%	28.6%	30.0%	26.5%	31.5%	5.0%	30.6%
White	Loan Originated	37	1,108	2,567	2,572	1,944	3,949	247	12,424
	Application Denied	48	501	603	410	230	394	57	2,243
	Denial Rate	56.5%	31.1%	19.0%	13.7%	10.6%	9.1%	18.8%	15.3%
Not Available	Loan Originated	3	54	131	139	110	245	15	697
	Application Denied	12	72	96	45	34	75	17	351
	Denial Rate	80.0%	57.1%	42.3%	24.5%	23.6%	23.4%	53.1%	33.5%
Not Applicable	Loan Originated	0	1	0	0	1	6	1	9
	Application Denied	0	0	0	1	0	0	0	1
	Denial Rate	%	.0%	%	100.0%	.0%	.0%	.0%	10.0%
Total	Loan Originated	41	1,189	2,775	2,820	2,152	4,464	285	13,726
	Application Denied	65	594	725	505	295	561	77	2,822
	Denial Rate	61.3%	33.3%	20.7%	15.2%	12.1%	11.2%	21.3%	17.1%
Non-Hispanic Ethnicity	Loan Originated	35	1,105	2,572	2,603	1,991	4,105	260	12,671
	Application Denied	48	487	603	433	252	480	53	2,356
	Denial Rate	57.8%	30.6%	19.0%	14.3%	11.2%	10.5%	16.9%	15.7%
Hispanic (Ethnicity)	Loan Originated	1	10	30	26	14	31	2	114
	Application Denied	2	13	8	9	1	4	0	37
	Denial Rate	66.7%	56.5%	21.1%	25.7%	6.7%	11.4%	.0%	24.5%

PREDATORY LENDING

Table 32.D.15
Originated Owner-Occupied Loans by HAL Status
 32. Portage County
 2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Other	2,021	2,073	2,019	1,639	1,080	1,002	989	906	11,729
HAL	296	592	554	263	152	89	23	28	1,997
Total	2,317	2,665	2,573	1,902	1,232	1,091	1,012	934	13,726
Percent HAL	12.8%	22.2%	21.5%	13.8%	12.3%	8.2%	2.3%	3.0%	14.5%

Table 32.D.16
Loans by Loan Purpose by HAL Status
 32. Portage County
 2004–2011 HMDA Data

Loan Purpose		2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	Other	2,021	2,073	2,019	1,639	1,080	1,002	989	906	11,729
	HAL	296	592	554	263	152	89	23	28	1,997
	Percent HAL	12.8%	22.2%	21.5%	13.8%	12.3%	8.2%	2.3%	3.0%	14.5%
Home Improvement	Other	310	340	352	315	194	97	89	84	1,781
	HAL	90	116	114	98	42	23	9	10	502
	Percent HAL	22.5%	25.4%	24.5%	23.7%	17.8%	19.2%	9.2%	10.6%	22.0%
Refinancing	Other	2,792	2,044	1,730	1,517	1,254	2,464	2,438	1,997	16,236
	HAL	540	807	759	372	166	147	9	21	2,821
	Percent HAL	16.2%	28.3%	30.5%	19.7%	11.7%	5.6%	.4%	1.0%	14.8%
Total	Other	5,123	4,457	4,101	3,471	2,528	3,563	3,516	2,987	29,746
	HAL	926	1,515	1,427	733	152	89	23	28	5,320
	Percent HAL	15.3%	25.4%	25.8%	17.4%	12.5%	6.8%	1.2%	1.9%	15.2%

Table 32.D.17
HALs Originated by Race of Borrower
 32. Portage County
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	0	2	3	1	1	0	0	0	7
Asian	3	3	9	1	0	0	0	0	16
Black	13	36	45	15	2	0	0	0	111
White	258	478	464	227	147	87	22	27	1,710
Not Available	22	73	33	19	2	2	1	1	153
Not Applicable	0	0	0	0	0	0	0	0	0
Total	296	592	554	263	152	89	23	28	1,997
Hispanic (Ethnicity)	5	5	4	4	1	0	0	0	19

Table 32.D.18
Rate of HALs Originated by Race/Ethnicity of Borrower
 32. Portage County
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	.0%	66.7%	37.5%	20.0%	100.0%	.0%	.0%	.0%	26.9%
Asian	11.5%	9.7%	32.1%	5.0%	.0%	.0%	.0%	.0%	10.1%
Black	22.0%	48.0%	42.5%	22.1%	6.3%	.0%	.0%	.0%	27.0%
White	12.3%	19.9%	20.2%	13.2%	13.1%	8.6%	2.4%	3.1%	13.8%
Not Available	17.1%	48.7%	25.4%	23.5%	3.5%	4.9%	1.5%	2.3%	22.0%
Not Applicable	.0%	.0%	.0%	.0%	.0%	%	%	%	0%
Average	12.8%	22.2%	21.5%	13.8%	12.3%	8.2%	02.3%	03.0%	14.5%
Non-Hispanic Ethnicity	12.8%	20.7%	21.4%	13.4%	12.8%	8.3%	2.3%	3.1%	14.3%
Hispanic (Ethnicity)	20.8%	29.4%	17.4%	33.3%	8.3%	.0%	.0%	.0%	16.7%

Table 32.D.19
Loans by HAL Status by Race/Ethnicity of Borrower
 32. Portage County
 2004–2011 HMDA Data

Race	Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Other	2	1	5	4	0	2	4	1	19
	HAL	0	2	3	1	1	0	0	0	7
	Percent HAL	.0%	66.7%	37.5%	20.0%	100.0%	.0%	.0%	.0%	26.9%
Asian	Other	23	28	19	19	16	14	17	7	143
	HAL	3	3	9	1	0	0	0	0	16
	Percent HAL	11.5%	9.7%	32.1%	5.0%	.0%	.0%	.0%	.0%	10.1%
Black	Other	46	39	61	53	30	27	21	23	300
	HAL	13	36	45	15	2	0	0	0	111
	Percent HAL	22.0%	48.0%	42.5%	22.1%	6.3%	.0%	.0%	.0%	27.0%
White	Other	1,839	1,927	1,836	1,499	978	920	883	832	10,714
	HAL	258	478	464	227	147	87	22	27	1,710
	Percent HAL	12.3%	19.9%	20.2%	13.2%	13.1%	8.6%	02.4%	03.1%	13.8%
Not Available	Other	107	77	97	62	55	39	64	43	544
	HAL	22	73	33	19	2	2	1	1	153
	Percent HAL	17.1%	48.7%	25.4%	23.5%	3.5%	4.9%	1.5%	2.3%	22.0%
Not Applicable	Other	4	1	1	2	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	2,021	2,073	2,019	1,639	1,080	1,002	989	906	11,729
	HAL	296	592	554	263	152	89	23	28	1,997
	Percent HAL	12.8%	22.2%	21.5%	13.8%	12.3%	8.2%	2.3%	3.0%	14.5%
Non-Hispanic Ethnicity	Other	1,704	1,972	1,903	1,562	1,004	952	915	853	10,865
	HAL	250	514	517	242	148	86	22	27	1,806
	Percent HAL	12.8%	20.7%	21.4%	13.4%	12.8%	8.3%	2.3%	3.1%	14.3%
Hispanic (Ethnicity)	Other	19	12	19	8	11	8	10	8	95
	HAL	5	5	4	4	1	0	0	0	19
	Percent HAL	20.8%	29.4%	17.4%	33.3%	8.3%	.0%	.0%	.0%	16.7%

Table 32.D.20
Rates of HALs by Income of Borrower
 32. Portage County
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Average
\$15,000 or Below	22.2%	16.7%	22.2%	.0%	.0%	.0%	.0%	.0%	12.2%
\$15,001–\$30,000	16.6%	25.9%	26.8%	24.3%	35.4%	18.0%	1.1%	6.9%	20.7%
\$30,001–\$45,000	19.0%	32.8%	22.6%	17.8%	14.2%	9.9%	3.8%	4.2%	18.8%
\$45,001–\$60,000	13.9%	25.2%	23.7%	15.8%	11.5%	6.0%	5.1%	1.9%	16.0%
\$60,001–\$75,000	10.4%	22.1%	20.2%	12.3%	11.2%	6.7%	.7%	2.2%	13.5%
Above \$75,000	7.5%	13.1%	16.4%	8.4%	6.8%	5.0%	0.8%	2.1%	9.3%
Data Missing	5.9%	21.7%	44.8%	32.1%	10.0%	.0%	.0%	.0%	25.3%
Average	12.8%	22.2%	21.5%	13.8%	12.3%	8.2%	2.3%	3.0%	14.5%

Table 32.D.21
Loans by HAL Status by Income of Borrower
 32. Portage County
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Other	7	5	7	6	3	3	2	3	36
	HAL	2	1	2	0	0	0	0	0	5
	Percent HAL	22.2%	16.7%	22.2%	.0%	.0%	.0%	.0%	.0%	12.2%
\$15,001–\$30,000	Other	171	149	153	112	64	114	86	94	943
	HAL	34	52	56	36	35	25	1	7	246
	Percent HAL	16.6%	25.9%	26.8%	24.3%	35.4%	18.0%	1.1%	6.9%	20.7%
\$30,001–\$45,000	Other	408	366	356	300	230	209	201	184	2,254
	HAL	96	179	104	65	38	23	8	8	521
	Percent HAL	19.0%	32.8%	22.6%	17.8%	14.2%	9.9%	3.8%	4.2%	18.8%
\$45,001–\$60,000	Other	458	410	396	315	215	235	187	154	2,370
	HAL	74	138	123	59	28	15	10	3	450
	Percent HAL	13.9%	25.2%	23.7%	15.8%	11.5%	6.0%	5.1%	1.9%	16.0%
\$60,001–\$75,000	Other	345	320	335	263	174	153	139	133	1,862
	HAL	40	91	85	37	22	11	1	3	290
	Percent HAL	10.4%	22.1%	20.2%	12.3%	11.2%	6.7%	.7%	2.2%	13.5%
Above \$75,000	Other	568	769	719	624	385	284	372	330	4,051
	HAL	46	116	141	57	28	15	3	7	413
	Percent HAL	7.5%	13.1%	16.4%	8.4%	6.8%	5.0%	.8%	2.1%	9.3%
Data Missing	Other	64	54	53	19	9	4	2	8	213
	HAL	4	15	43	9	1	0	0	0	72
	Percent HAL	5.9%	21.7%	44.8%	32.1%	10.0%	.0%	.0%	.0%	25.3%
Total	Other	2,021	2,073	2,019	1,639	1,080	1,002	989	906	11,729
	HAL	296	592	554	263	152	89	23	28	1,997
	Percent HAL	12.8%	22.2%	21.5%	13.8%	12.3%	8.2%	2.3%	3.0%	14.5%

E. CRA DATA

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

Table 32.E.1
Small Business Loans Originated: \$100,000 or Less by Tract MFI
 32. Portage 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		42	1,484	311		1,837
2001		43	1,658	316		2,017
2002		64	2,129	433		2,626
2003		140	2,139	422		2,701
2004		150	2,149	466		2,765
2005		165	2,334	490		2,989
2006		185	3,215	796		4,196
2007		204	3,447	838		4,489
2008		195	2,729	671		3,595
2009		79	1,161	325		1,565
2010		59	1,030	272		1,361
2011		74	1,253	273		1,600
Total	0	1,400	24,728	5,613	0	31,741
Loan Amount (\$1,000s)						
2000		550	16,733	3,827		21,110
2001		689	17,586	3,796		22,071
2002		751	23,071	4,066		27,888
2003		1,248	20,656	3,955		25,859
2004		1,416	20,499	4,595		26,510
2005		1,496	25,035	5,245		31,776
2006		1,743	30,821	8,057		40,621
2007		2,003	32,089	7,872		41,964
2008		1,880	26,156	6,451		34,487
2009		1,103	14,968	3,792		19,863
2010		814	14,737	3,225		18,776
2011		731	15,281	3,848		19,860
Total	0	14,424	257,632	58,729	0	330,785

Table 32.E.2
Small Business Loans Originated: \$100,001 to \$250,000 by Tract MFI
 32. Portage 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		2	50	10		62
2001		1	84	18		103
2002		1	83	15		99
2003		4	89	21		114
2004		3	91	21		115
2005		3	61	10		74
2006		1	91	15		107
2007		1	56	2		59
2008		1	60	5		66
2009		0	45	4		49
2010		4	51	9		64
2011		1	50	8		59
Total	0	22	811	138	0	971
Loan Amount (\$1,000s)						
2000		500	8,083	1,718		10,301
2001		250	15,202	3,650		19,102
2002		250	14,171	2,792		17,213
2003		738	15,190	3,921		19,849
2004		700	16,044	4,126		20,870
2005		663	11,147	1,888		13,698
2006		250	16,352	2,813		19,415
2007		122	10,626	400		11,148
2008		188	10,768	896		11,852
2009		0	7,513	811		8,324
2010		609	9,163	1,459		11,231
2011		185	8,690	1,354		10,229
Total	0	4,455	142,949	25,828	0	173,232

Table 32.E.3
Small Business Loans Originated: More than \$250,000 by Tract MFI
 32. Portage 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	54	15		69
2001		1	51	10		62
2002		3	68	14		85
2003		6	73	17		96
2004		3	60	22		85
2005		4	60	15		79
2006		2	52	16		70
2007		1	72	10		83
2008		3	49	13		65
2009		1	49	12		62
2010		3	55	19		77
2011		1	51	12		64
Total	0	28	694	175	0	897
Loan Amount (\$1,000s)						
2000		0	26,700	8,965		35,665
2001		290	26,461	5,899		32,650
2002		1,650	36,684	9,050		47,384
2003		2,590	42,107	10,410		55,107
2004		1,300	35,325	12,896		49,521
2005		1,750	34,142	8,544		44,436
2006		1,265	29,291	6,443		36,999
2007		554	37,690	5,053		43,297
2008		1,371	28,774	6,618		36,763
2009		750	25,851	6,918		33,519
2010		1,217	29,755	9,570		40,542
2011		1,000	27,865	6,512		35,377
Total	0	13,737	380,645	96,878	0	491,260

Table 32.E.4
Small Business Loans to Businesses with Gross Annual Revenues of Less Than \$1 Million by Tract MFI
 32. Portage 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		16	618	114		748
2001		19	662	127		808
2002		17	616	110		743
2003		54	659	152		865
2004		61	713	168		942
2005		78	1,027	200		1,305
2006		64	1,220	227		1,511
2007		70	1,292	273		1,635
2008		57	816	171		1,044
2009		26	402	85		513
2010		24	338	84		446
2011		31	503	131		665
Total	0	517	8,866	1,842	0	11,225
Loan Amount (\$1,000s)						
2000		609	25,746	6,544		32,899
2001		285	26,449	5,439		32,173
2002		881	32,149	5,549		38,579
2003		2,655	29,170	5,432		37,257
2004		642	22,667	7,914		31,223
2005		2,025	22,332	4,945		29,302
2006		773	25,294	6,156		32,223
2007		1,303	28,188	4,249		33,740
2008		1,422	20,297	2,802		24,521
2009		587	11,687	2,660		14,934
2010		787	14,985	4,165		19,937
2011		634	15,158	5,208		21,000
Total	0	12,603	274,122	61,063	0	347,788

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 32.F.1
Fair Housing Complaints by Basis
32. Portage County
2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color										
Disability	2	6	8	8	5	5	5	3	6	48
Family Status	1	3	2	4	4	4	3	2		23
National Origin			1				1			2
Race	2	3	5	4	3	2	1	2		22
Religion		1								1
Sex	1		2	1	1		1	1		7
Total Bases	6	13	18	17	13	11	11	8	6	103
Total Complaints	4	10	18	15	10	11	10	8	6	92

Table 32.F.2
Fair Housing Complaints by Issue
32. Portage County
2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Non-compliance with design and construction requirements (handicap)			2		1				6	9
Discriminatory refusal to rent and negotiate for rental		1		1		4	1			7
Otherwise deny or make housing available									6	6
Discriminatory advertising, statements, and notices					1	2	2			5
Discriminatory advertisement - rental				1	1	1		1		4
Discrimination in services and facilities relating to rental			1	1				1		3
Discriminatory acts under Section 818 (coercion, etc.)				3						3
Discriminatory terms, conditions, privileges, or services and facilities		1	2	8	2	2	2	1	6	24
Discrimination in terms, conditions or privileges relating to rental	2	2	8	1	1	4	3	1		22
Discrimination in terms, conditions, privileges relating to sale			1		1					2
Restriction of choices relative to a rental						2				2
Failure to make reasonable accommodation	1	1	3		1	2	5	3		16
Discriminatory refusal to rent	1	2		3	1	1	1	1		10
Other discriminatory acts	2	3	2	1	2					10
Discriminatory refusal to sell and negotiate for sale			1							1
Discriminatory financing (includes real estate transactions)					1					1
Discrimination in the terms or conditions for making loans							1			1
Discriminatory brokerage service							1			1
Refusing to provide municipal services or property								1		1
Total Issues	6	10	20	19	12	18	16	9	18	128
Total Complaints	4	10	18	15	10	11	10	8	6	92

Table 32.F.3
Fair Housing Complaints by Closure Status
32. Portage County
2004–2012 HUD Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Administrative Closure			2	1	1			1		5

Cause (FHAP)		2	3	3	1	2	3	2		16
Charged (HUD)						2				2
Conciliated / Settled	3	5	6	5	5	5	4	2		35
No Cause	1	3	7	6	3	2	1	3		26
Open							2		6	8
Total Complaints	4	10	18	15	10	11	10	8	6	92

HUD Complaints Found With Cause

Table 32.F.4
Fair Housing Complaints Found With Cause by Basis
32. Portage County
2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability	2	5	6	5	4	5	2			29
Family Status	1	2	2	1	4	4	3	2		19
National Origin			1				1			2
Race	1	3					1	1		6
Sex				1			1	1		3
Total Bases	4	10	9	7	8	9	8	4		59
Total Complaints	3	7	9	8	6	9	7	4		53

Table 32.F.5
Fair Housing Complaints Found With Cause by Issue
32. Portage County
2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Failure to make reasonable accommodation		1	2		1	2	2			9
Discriminatory refusal to rent		1		3		1	1	1		8
Other discriminatory acts		3			2					7
Discriminatory refusal to rent and negotiate for rental		1				4	1			6
Discriminatory advertising, statements, and notices					1	2	2			5
Discriminatory advertisement - rental				1	1	1		1		4
Discrimination in services and facilities relating to rental			1	1				1		3
Non-compliance with design and construction requirements (handicap)			2		1					3
Restriction of choices relative to a rental						2				2
Discrimination in terms, conditions or privileges relating to rental	1		4		1	3	3			12
Discriminatory terms, conditions, privileges, or services and facilities		1	2	5		1		1		10
Discrimination in the terms or conditions for making loans							1			1
Discriminatory brokerage service							1			1
Total Issues	5	7	11	10	7	16	11	4	0	71
Total Complaints	3	7	9	8	6	9	7	4		53

OHIO CIVIL RIGHTS COMMISSION COMPLAINTS

Table 32.F.6
Fair Housing Complaints by Basis
 32. Portage County
 2004–2012 OCRC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color		1	1				1	1		4
Disability	2	5	8	10	2	6	6	5	1	45
Family Status		3	2	4	4	2	4	1		20
Gender	2		5	5	1	1	1		1	16
National Origin			1			1				2
Race	2	8	8	3	1	2	2	3		29
Religion		1								1
Retaliation	1	3	4	3	1	3	2	49	1	67
Other	1			3						4
Total Bases	8	21	29	28	10	14	16	59	3	188
Total Complaints	6	15	22	18	8	8	10	58	2	147

Table 32.F.7
Fair Housing Complaints by Issue
 32. Portage County
 2004–2012 OCRC Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Advertising				1						1
Constructive Discharge			1							1
Exclusion					1					1
Harassment			2	1		2				5
Intimidation		1	1	3	2		2	4		13
Other	4	6	6	3	2	2	3	29	2	57
Reasonable Accommodation		2	2	2			5	2		13
Sexual Harassment	1		2							3
Terms and Conditions	2	7	16	12	5	5	6	29		82
Total Issues	7	16	30	22	10	9	16	64	2	176
Total Complaints	6	15	22	18	8	8	10	58	2	147

Table 32.F.8
Fair Housing Complaints by Closure Status
 32. Portage County
 2004–2012 OCRC Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Administrative Closure			1				2	1		4
CP Withdrawal – No Benefit			1	1		1				3
No Cause Finding Issued	3	7	11	12	4	3	3	6		49
No Jurisdiction							1	1	1	3
Settlement With Benefits	1	5	8	4	2	4	4			28
Successful Conciliation		1						1		2
Withdrawal With Benefits	2	2	1	1	2			49	1	58
Total Complaints	6	15	22	18	8	8	10	58	2	147

FAIR HOUSING CONTACT SERVICE COMPLAINTS

Table 32.F.9
Fair Housing Complaints by Basis
 32. Portage County
 2004–2012 FHCS Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Advertising	1									1
Color			1	1						2
Criminal Background					1	1				2
Disability	3		11	14	17	17	14	14	8	98
Familial Status	2	1	8	8	4	3	7	3		36
Harassment				1	2					3
National Origin			1		1	1	1		1	5
Race	1	1	8	10	5	1	5	2		33
Retaliation			2	1	2	3	4		2	14
Sex			4	2	3	1	3			13
Other				2	2	3	2		1	10
None			1							1
Unknown					1					1
Total Bases	7	2	36	39	38	30	36	19	12	219
Total Complaints	5	2	29	27	27	24	29	21	12	176

Table 32.F.10
Fair Housing Complaints by Closure Status
 32. Portage County
 2004–2012 FHCS Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Closed			12	6	7	8	3	1		37
Dismissed							1			1
Elected not to pursue						3			1	4
Independently resolved						3	3	3	2	11
Inquiry			8	9	15			1	2	35
Lack of jurisdiction									1	1
No contact							8	7	2	17
No probable cause			1	4	1	2	3	3		14
Pending			1	6						7
Probable cause			1	1		1	1	2		6
Reasonable accommodation granted							1	2	2	5
Reasonable modification granted								2		2
Referred for other assistance							5		2	7
Settled			6	1	2	7	4			20
Settled through OCRC					2					2
Withdrawal of Charge										
Missing	5	2								7
Total Complaints	5	2	29	27	27	24	29	21	12	176

THE HOUSING RESEARCH AND ADVOCACY CENTER COMPLAINTS

Table 32.F.11
Fair Housing Complaints by Basis

32 Portage County
2004–2012 HRAC Data

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

Table 32.F.12
Fair Housing Complaints by Issue

32 Portage County
2004–2012 HRAC Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Rental				1			2			3
Total	0	0	0	1	0	0	2	0	0	3
Total Complaints				1			2			3

Table 32.F.13
Fair Housing Complaints by Action Taken

32 Portage County
2004–2012 HRAC Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Referred to OCRC				1			1			2
Missing Action							1			1
Total	0	0	0	1	0	0	2	0	0	3
Total Complaints				1			2			3

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 32.G.1
Primary Role of Respondent

32. Portage County
 2012–2013 Fair Housing Survey for Housing
 Stakeholders Data

Primary Role	Total
Advocate/Service Provider	5
Banking/Finance	
Condo or Homeowner Association Leader	
Construction/Development	2
Insurance	
Law/Legal Services	
Local Government	2
Property Management	2
Real Estate	
Resident Advisory Council Leader	
Other Role	1
Total	12

FEDERAL, STATE, AND LOCAL LAWS

Table 32.G.2
**Familiarity with Fair
 Housing Laws**

32. Portage County
 2012–2013 Fair Housing Survey
 for Housing Stakeholders Data

Familiarity	Total
Not Familiar	
Somewhat Familiar	3
Very Familiar	7
Missing	2
Total	12

Table 32.G.3
Perceptions About Fair Housing Laws

32. Portage 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?	9	1		2	12
Are fair housing laws difficult to understand or follow?	4	6		2	12
Do you think fair housing laws should be changed?	1	6	3	2	12
Do you think fair housing laws are adequately enforced?	8	1	1	2	12

Table 32.G.4
Fair Housing Activities

32. Portage County
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?		8	1	1	2	12
Have you participated in fair housing training?		7	2		3	12
Are you aware of any fair housing testing?		4	6		2	12
Testing and education	Too Little	Right Amount	Too Much	Don't Know	Missing	Total
Is there sufficient outreach and education activity?	4	4	1	1	2	12
Is there sufficient testing?	2	2		6	2	12

Table 32.G.5

Protected Classes

32. Portage County
2012–2013 Fair Housing Survey
for Housing Stakeholders Data

Protected Class	Total
Family Status	3
Religion	3
Gender	1
National Origin	1
Color	2
Sexual Orientation	1
Age	1
Military	2
Disability	1
Ancestry	1
Ethnicity	
Race	
Other	1
Total	17

Table 32.G.6

Fair Housing Violation Referrals

32. Portage County
2012–2013 Fair Housing Survey for Housing
Stakeholders Data

Referral	Total
ACLU	8
City	2
Cleveland Fair Housing Board	1
Cleveland Tenants Organization	1
Total	12

LOCAL FAIR HOUSING

Table 32.G.7

Local Fair Housing

32. Portage 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	5	1	4	12
Are there any specific geographic areas that have fair housing problems?		5	3	4	12
Are there any specific groups in that face housing discrimination?	3	3	2	4	12

FAIR HOUSING IN THE PRIVATE SECTOR

Table 32.G.8

Barriers to Fair Housing in the Private Sector

32. Portage 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	3	2	3	12
The real estate industry?	1	5	3	3	12
The mortgage and home lending industry?		6	3	3	12
The housing construction or accessible housing design fields?	1	6	2	3	12
The home insurance industry?		6	3	3	12
The home appraisal industry?		5	3	4	12
Any other housing services?		6	3	3	12

FAIR HOUSING IN THE PUBLIC SECTOR

Table 32.G.9

Barriers to Fair Housing in the Public Sector

32. Portage 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	3	4	4	12
Zoning laws?		4	4	4	12
Occupancy standards or health and safety codes?		4	4	4	12
Property tax policies?		5	3	4	12
Permitting process?		4	4	4	12
Housing construction standards?		4	4	4	12
Neighborhood or community development policies?		4	4	4	12
Limited access to government services, such as employment services?		7	1	4	12
Public administrative actions or regulations?		6	2	4	12

NARRATIVE COMMENTS

Federal, State, and Local Laws

Table 32.G.10

How did you become aware of fair housing laws?

32. Portage County

2013 Fair Housing Survey Data

Comments:
<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>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 have worked with the Fair Housing Board and Community Legal Aid with regard to housing issues.</p> <p>Property Management Training</p> <p>Read information supplied by local housing authority.</p> <p>Through my work and multiple trainings on the topic.</p>

Table 32.G.11

How should fair housing laws be changed?

32. Portage County

2013 Fair Housing Survey Data

Comments:
<p>Property owner should have the final say in who he does or does not rent to. Most property owners are only</p>

concerned about the color "green" and getting paid on regular basis. Laws force landlords to take renters who may not qualify financially.

Local Fair Housing

Table 32.G.12

Are there any specific groups in that face housing discrimination?

32. Portage County
2013 Fair Housing Survey Data

Comments:
Mental illness mentally ill Persons with disabilities

Table 32.G.13

Please share any additional comments.

32. Portage County
2013 Fair Housing Survey Data

Comments:
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.

Fair Housing in the Private Sector

Table 32.G.14

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

32. Portage County
2013 Fair Housing Survey Data

Comments:
Difficulties faced by persons with disabilities Obtaining affordable housing is a barrier to the poor and working poor. Refusal to rent to people who are affiliated with the local mental health agency (discrimination based on disability).

Fair Housing in the Public Sector

Table 32.G.15

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

32. Portage County
2013 Fair Housing Survey Data

Comments:
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.

Table 32.G.16
Are you aware of any questionable practices or barriers to fair housing choice in housing construction standards?

32. Portage County
 2013 Fair Housing Survey Data

Comments:
What is your definition of accessible housing?

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 Portage County that received and completed the survey.³⁵

Table 32.H.1
Housing Development
 32. Portage 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"?	4	0	0	1	5
Guidelines that encourage development affordable housing units?	1	2	1	1	5
Any potential barriers to the development of low- to moderate- income housing?	0	4	0	1	5
Guidelines that allow the development of mixed use housing?	2	2	0	1	5
Any potential barriers to the development of mixed use housing?	1	3	0	1	5
Occupancy Standards					
A definition for the term "family"?	3	1	0	1	5
Residential occupancy standards or limits?	3	0	1	1	5
Special Needs Housing					
A definition for the term "disability"?	2	1	1	1	5
Development standards for making housing accessible to persons with disabilities?	0	4	0	1	5
A process by which persons with disabilities can request modification to the jurisdiction's policies?	2	2	0	1	5
Standards for the development of senior housing?	0	4	0	1	5
Guidelines that distinguish senior citizen housing from other residential uses?	0	3	1	1	5
Guidelines for developing housing for any other special needs populations?	1	3	0	1	5
Fair Housing Policies					
A fair housing ordinance, policy, or regulation?	2	2	0	1	5
Policies or practices for "affirmatively furthering fair housing"?	2	2	0	1	5

³⁵ 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 Portage 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 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 Portage 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 in Portage County.*

Results of the Fair Housing Surveys indicate that a few local communities in the County 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 Portage 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:* Decisions regarding definitions of “family,” “dwelling unit,” and related terms

Decisions made by some communities in the County 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 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. Encourage adoption.

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 in the County. 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 32.I.1
Impediments Matrix
 32. Portage 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 ³⁶		
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			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	Decisions regarding definitions of "family," "dwelling unit," and related terms									X	Disabled persons, families	L
5	Lack of inclusionary policies							X		X	All	M

³⁶ 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.

33. CITY OF KENT

A. CENSUS BUREAU DATA

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

Table 33.A.1

Population by Age

33. City of Kent

2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Under 5	1,397	5.0%	1,207	4.2%	-13.6%
5 to 19	6,972	25.0%	7,304	25.3%	4.8%
20 to 24	7,351	26.3%	8,274	28.6%	12.6%
25 to 34	3,639	13.0%	3,352	11.6%	-7.9%
35 to 54	5,256	18.8%	4,474	15.5%	-14.9%
55 to 64	1,186	4.2%	2,150	7.4%	81.3%
65 or Older	2,105	7.5%	2,143	7.4%	1.8%
Total	27,906	100.0%	28,904	100.0%	3.6%

Table 33.A.2

Elderly Population by Age

33. City of Kent

2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
65 to 66	186	8.8%	262	12.2%	40.9%
67 to 69	309	14.7%	347	16.2%	12.3%
70 to 74	530	25.2%	417	19.5%	-21.3%
75 to 79	478	22.7%	379	17.7%	-20.7%
80 to 84	339	16.1%	380	17.7%	12.1%
85 or Older	263	12.5%	358	16.7%	36.1%
Total	2,105	100.0%	2,143	100.0%	1.8%

Table 33.A.3

Population by Race and Ethnicity

33. City of Kent

2000 & 2010 Census SF1 Data

Race	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
White	24,018	86.1%	24,019	83.1%	.0%
Black	2,541	9.1%	2,782	9.6%	9.5%
American Indian	53	.2%	52	.2%	-1.9%
Asian	599	2.1%	1,065	3.7%	77.8%
Native Hawaiian/ Pacific Islander	9	.0%	17	.1%	88.9%
Other	124	.4%	134	.5%	8.1%
Two or More Races	562	2.0%	835	2.9%	48.6%
Total	27,906	100.0%	28,904	100.0%	3.6%
Non-Hispanic	27,549	98.7	28,262	97.8%	2.6%
Hispanic	357	1.3%	642	2.2%	79.8%

Table 33.A.4
Disability by Age
 33. City of Kent
 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	137	10.2%	123	8.2%	260	9.1%
18 to 34	454	7.2%	336	3.7%	790	5.1%
35 to 64	431	13.0%	430	11.7%	861	12.3%
65 to 74	212	35.8%	86	12.0%	298	22.8%
75 or Older	87	40.7%	408	66.2%	495	59.6%
Total	1,321	10.6%	1,383	8.5%	2,704	9.4%

Table 33.A.5
Employment Status by Disability and Type: Age 18 to 64
 33. City of Kent
 2010 Three-Year ACS Data

Disability Status	Population
Employed:	14,052
With a disability:	619
With a hearing difficulty	303
With a vision difficulty	43
With a cognitive difficulty	184
With an ambulatory difficulty	206
With a self-care difficulty	0
With an independent living difficulty	84
No disability	13,433
Unemployed:	2,222
With a disability:	223
With a hearing difficulty	0
With a vision difficulty	50
With a cognitive difficulty	149
With an ambulatory difficulty	24
With a self-care difficulty	24
With an independent living difficulty	0
No disability	1,999
Not in labor force:	6,059
With a disability:	809
With a hearing difficulty	112
With a vision difficulty	106
With a cognitive difficulty	493
With an ambulatory difficulty	339
With a self-care difficulty	100
With an independent living difficulty	213
No disability	5,250
Total	22,333

Table 33.A.6
Households by Income

33. City of Kent
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	2,744	28.0%	3,289	30.3%
\$15,000 to \$19,999	672	6.9%	1,014	9.3%
\$20,000 to \$24,999	873	8.9%	845	7.8%
\$25,000 to \$34,999	1,289	13.2%	840	7.7%
\$35,000 to \$49,999	1,438	14.7%	1,376	12.7%
\$50,000 to \$74,999	1,353	13.8%	1,326	12.2%
\$75,000 to \$99,999	731	7.5%	1,013	9.3%
\$100,000 or More	684	7.0%	1,152	10.6%
Total	9,784	100.0%	10,855	100.0%

Table 33.A.7
Poverty by Age

33. City of Kent
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	574	10.2%	866	10.8%
6 to 17	508	9.0%	480	6.0%
18 to 64	4,351	77.4%	6,537	81.9%
65 or Older	189	3.4%	101	1.3%
Total	5,622	100.0%	7,984	100.0%
Poverty Rate	25.2%	.	34.0%	.

Table 33.A.8
Households by Year Home Built

33. City of Kent
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	1,763	18.0%	1,681	15.5%
1940 to 1949	727	7.4%	502	4.6%
1950 to 1959	1,294	13.2%	1,487	13.7%
1960 to 1969	2,193	22.4%	1,891	17.4%
1970 to 1979	2,322	23.7%	2,466	22.7%
1980 to 1989	729	7.4%	958	8.8%
1990 to 1999	771	7.9%	934	8.6%
2000 to 2004	.	.	567	5.2%
2005 or Later	.	.	369	3.4%
Total	9,799	100.0%	10,855	100.0%

Table 33.A.9
Housing Units by Type

33. City of Kent
2000 Census SF3 & 2010 Five-Year ACS Data

Unit Type	2000 Census		2010 Five-Year ACS	
	Units	% of Total	Units	% of Total
Single-Family	4,695	44.9%	5,529	46.7%
Duplex	917	8.8%	878	7.4%
Tri- or Four-Plex	708	6.8%	689	5.8%
Apartment	4,056	38.8%	4,724	39.9%
Mobile Home	85	.8%	11	.1%
Boat, RV, Van, Etc.	0	.0%	0	.0%
Total	10,461	100.0%	11,831	100.0%

Table 33.A.10
Housing Units by Tenure

33. City of Kent
2000 & 2010 Census SF1 Data

Tenure	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
Occupied Housing Units	9,772	93.6%	10,288	92.1%	5.3%
Owner-Occupied	3,697	37.8%	3,808	37.0%	3.0%
Renter-Occupied	6,075	62.2%	6,480	63.0%	6.7%
Vacant Housing Units	663	6.4%	886	7.9%	33.6%
Total Housing Units	10,435	100.0%	11,174	100.0%	7.1%

Table 33.A.11
Disposition of Vacant Housing Units

33. City of Kent
2000 & 2010 Census SF1 Data

Disposition	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
For Rent	414	62.4%	565	63.8%	36.5%
For Sale	67	10.1%	92	10.4%	37.3%
Rented or Sold, Not Occupied	29	4.4%	32	3.6%	10.3%
For Seasonal, Recreational, or Occasional Use	19	2.9%	40	4.5%	110.5%
For Migrant Workers	0	0.0%	0	.0%	%
Other Vacant	134	20.2%	157	17.7%	17.2%
Total	663	100.0%	886	100.0%	33.6%

Table 33.A.12
Households by Household Size

33. City of Kent
2000 & 2010 Census SF1 Data

Size	2000 Census		2010 Census		% Change 00-10
	Households	% of Total	Households	% of Total	
One Person	3,169	32.4%	3,440	33.4%	8.6%
Two Persons	3,335	34.1%	3,657	35.5%	9.7%
Three Persons	1,645	16.8%	1,606	15.6%	-2.4%
Four Persons	988	10.1%	971	9.4%	-1.7%
Five Persons	445	4.6%	411	4.0%	-7.6%
Six Persons	134	1.4%	137	1.3%	2.2%
Seven Persons or More	56	.6%	66	.6%	17.9%
Total	9,772	100.0%	10,288	100.0%	5.3%

Table 33.A.13
Household Type by Tenure
 33. City of Kent
 2000 & 2010 Census SF1 Data

Household Type	2000 Census		2010 Census		% Change 00-10
	Households	% of Total	Households	% of Total	
Family Households	4,801	49.1%	4,501	43.8%	-6.2%
Married-Couple Family	3,205	66.8%	2,827	62.8%	-11.8%
Owner-Occupied	2,302	71.8%	2,233	79.0%	-3.0%
Renter-Occupied	903	28.2%	594	21.0%	-34.2%
Other Family	1,596	33.2%	1,674	37.2%	4.9%
Male Householder, No Spouse	301	18.9%	392	23.4%	30.2%
Owner-Occupied	109	36.2%	152	38.8%	39.4%
Renter-Occupied	192	63.8%	240	61.2%	25.0%
Female Householder, No Spouse	1,295	81.1%	1,282	76.6%	-1.0%
Owner-Occupied	335	25.9%	346	27.0%	3.3%
Renter-Occupied	960	74.1%	936	73.0%	-2.5%
Non-Family Households	4,971	50.9%	5,787	56.3%	16.4%
Owner-Occupied	951	19.1%	1,077	18.6%	13.2%
Renter-Occupied	4,020	80.9%	4,710	81.4%	17.2%
Total	9,772	100.0%	10,288	100.0%	5.3%

Table 33.A.14
Group Quarters Population
 33. City of Kent
 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	1.1%	0	.0%	-100.0%
Juvenile Facilities	.	.	0	.0%	.
Nursing Homes	91	98.9%	81	100.0%	-11.0%
Other Institutions	0	.0%	0	.0%	%
Total	92	100.0%	81	100.0%	-12.0%
Noninstitutionalized					
College Dormitories	5,542	98.4%	5,922	98.9%	6.9%
Military Quarters	0	.0%	0	.0%	%
Other Noninstitutional	91	1.6%	64	1.1%	-29.7%
Total	5,633	98.4%	5,986	98.7%	6.3%
Total Group Quarters Population	5,725	100.0%	6,067	100.0%	6.0%

Table 33.A.15
Overcrowding and Severe Overcrowding
 33. City of Kent
 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	3,742	100.0%	0	.0%	0	.0%	3,742
2010 ACS	4,159	100.0%	0	.0%	0	.0%	4,159
Renter							
2000 Census	5,839	96.4%	157	2.6%	61	1.0%	6,057
2010 ACS	6,644	99.2%	40	.6%	12	.2%	6,696
Total							
2000 Census	9,581	97.8%	157	1.6%	61	.6%	9,799
2010 ACS	10,803	99.5%	40	.4%	12	.1%	10,855

Table 33.A.16
Households with Incomplete Plumbing Facilities
 33. City of Kent
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Plumbing Facilities	9,782	10,801
Lacking Complete Plumbing Facilities	17	54
Total Households	9,799	10,855
Percent Lacking	.2%	.5%

Table 33.A.17
Households with Incomplete Kitchen Facilities
 33. City of Kent
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Kitchen Facilities	9,705	10,634
Lacking Complete Kitchen Facilities	94	221
Total Households	9,799	10,855
Percent Lacking	1.0%	2.0%

Table 33.A.18
Cost Burden and Severe Cost Burden by Tenure
 33. City of Kent
 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	1,931	80.8%	297	12.4%	162	6.8%	0	.0%	2,390
2010 ACS	2,109	67.7%	562	18.0%	428	13.7%	16	.5%	3,115
Owner Without a Mortgage									
2000 Census	964	89.4%	44	4.1%	62	5.8%	8	.7%	1,078
2010 ACS	977	93.6%	31	3.0%	22	2.1%	14	1.3%	1,044
Renter									
2000 Census	2,976	49.1%	1,294	21.4%	1,461	24.1%	326	5.4%	6,057
2010 ACS	2,185	32.6%	1,382	20.6%	2,763	41.3%	366	5.5%	6,696
Total									
2000 Census	5,871	61.6%	1,635	17.2%	1,685	17.7%	334	3.5%	9,525
2010 ACS	5,271	48.6%	1,975	18.2%	3,213	29.6%	396	3.6%	10,855

Table 33.A.19
Median Housing Costs
 33. City of Kent
 2000 Census SF3 & 2010 Five-Year ACS Data

Housing Cost	2000 Census	2010 ACS
Median Contract Rent	\$458	\$596
Median Home Value	\$113,300	\$145,100

B. BLS DATA

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

Table 33.B.1
Labor Force Statistics
 33. City of Kent
 1990–2011 BLS Data

Year	Labor Force	Employment	Unemployment	Unemployment Rate	Statewide Unemployment Rate
1990	15,254	14,341	913	6.0%	5.7%
1991	15,474	14,427	1,047	6.8%	6.6%
1992	15,958	14,683	1,275	8.0%	7.4%
1993	16,040	14,952	1,088	6.8%	6.7%
1994	16,296	15,336	960	5.9%	5.6%
1995	16,442	15,641	801	4.9%	4.9%
1996	16,791	15,916	875	5.2%	5.0%
1997	16,687	15,889	798	4.8%	4.6%
1998	16,618	15,874	744	4.5%	4.3%
1999	16,827	16,045	782	4.6%	4.3%
2000	14,129	13,517	612	4.3%	4.0%
2001	14,146	13,476	670	4.7%	4.4%
2002	14,200	13,340	860	6.1%	5.7%
2003	16,651	15,929	722	4.3%	6.2%
2004	16,750	15,978	772	4.6%	6.1%
2005	16,985	16,211	774	4.6%	5.9%
2006	17,127	16,407	720	4.2%	5.4%
2007	17,471	16,694	777	4.4%	5.6%
2008	17,443	16,538	905	5.2%	6.5%
2009	16,976	15,695	1,281	7.5%	10.1%
2010	17,295	15,950	1,345	7.8%	10.0%
2011	17,093	15,931	1,162	6.8%	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.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 33.C.1
Purpose of Loan by Year
 33. City of Kent
 2004–2011 HMDA Data

Purpose	2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	548	597	675	562	309	257	242	204	3,394
Home Improvement	97	97	79	75	70	32	29	24	503
Refinancing	945	821	722	539	343	578	530	433	4,911
Total	1,590	1,515	1,476	1,176	722	867	801	661	8,808

Table 33.C.2
Occupancy Status for Home Purchase Loan Applications
 33. City of Kent
 2004–2011 HMDA Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	Total
Owner-Occupied	480	486	547	495	258	228	209	174	2,877
Not Owner-Occupied	63	106	125	62	50	28	29	27	490
Not Applicable	5	5	3	5	1	1	4	3	27
Total	548	597	675	562	309	257	242	204	3,394

Table 33.C.3
Owner-Occupied Home Purchase Loan Applications by Loan Type
 33. City of Kent
 2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Conventional	427	438	469	443	147	83	68	81	2,156
FHA - Insured	44	39	58	42	105	137	121	87	633
VA - Guaranteed	9	9	20	10	6	8	20	6	88
Rural Housing Service or Farm Service Agency	0	0	0	0	0	0	0	0	0
Total	480	486	547	495	258	228	209	174	2,877

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 33.C.4
Loan Applications by Action Taken
 33. City of Kent
 2004–2011 HMDA Data

Action	2004	2005	2006	2007	2008	2009	2010	2011	Total
Loan Originated	273	270	314	241	147	116	107	85	1,553
Application Approved but not Accepted	36	25	24	26	7	8	0	3	129
Application Denied	46	53	43	53	21	16	17	10	259
Application Withdrawn by Applicant	37	24	20	30	10	10	9	3	143
File Closed for Incompleteness	16	5	2	7	0	0	4	0	34
Loan Purchased by the Institution	72	108	144	138	73	78	72	73	758
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	480	486	547	495	258	228	209	174	2,877
Denial Rate	14.4%	16.4%	12.0%	18.0%	12.5%	12.1%	13.7%	10.5%	14.3%

Table 33.C.5
Denial Rates by Gender of Applicant
 33. City of Kent
 2004–2011 HMDA Data

Year	Male	Female	Not Available	Not Applicable	Average
2004	10.4%	22.4%	20.0%	%	14.4%
2005	15.1%	22.4%	.0%	%	16.4%
2006	11.3%	10.6%	66.7%	%	12.0%
2007	14.9%	21.4%	71.4%	.0%	18.0%
2008	11.9%	14.6%	.0%	%	12.5%
2009	12.3%	10.9%	20.0%	%	12.1%
2010	9.8%	18.9%	40.0%	%	13.7%
2011	6.6%	10.3%	60.0%	%	10.5%
Average	12.3%	17.1%	34.7%	.0%	14.3%

Table 33.C.6
Loan Applications by Selected Action Taken by Gender of Applicant
 33. City of Kent
 2004–2011 HMDA Data

Gender		2004	2005	2006	2007	2008	2009	2010	2011	Total
Male	Originated	189	202	211	172	104	71	74	57	1,080
	Denied	22	36	27	30	14	10	8	4	151
	Denial Rate	10.4%	15.1%	11.3%	14.9%	11.9%	12.3%	9.8%	6.6%	12.3%
Female	Originated	76	59	101	66	41	41	30	26	440
	Denied	22	17	12	18	7	5	7	3	91
	Denial Rate	22.4%	22.4%	10.6%	21.4%	14.6%	10.9%	18.9%	10.3%	17.1%
Not Available	Originated	8	9	2	2	2	4	3	2	32
	Denied	2	0	4	5	0	1	2	3	17
	Denial Rate	20.0%	.0%	66.7%	71.4%	.0%	20.0%	40.0%	60.0%	34.7%
Not Applicable	Originated	0	0	0	1	0	0	0	0	1
	Denied	0	0	0	0	0	0	0	0	0
	Denial Rate	%	%	%	.0%	%	%	%	%	.0%
Total	Originated	273	270	314	241	147	116	107	85	1,553
	Denied	46	53	43	53	21	16	17	10	259
	Denial Rate	14.4%	16.4%	12.0%	18.0%	12.5%	12.1%	13.7%	10.5%	14.3%

Table 33.C.7
Denial Rates by Race/Ethnicity of Applicant
 33. City of Kent
 2004–2011 HMDA Data

Race/Ethnicity	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	.0%	%	%	75.0%	%	%	%	%	60.0%
Asian	16.7%	20.0%	.0%	25.0%	33.3%	.0%	%	%	14.7%
Black	50.0%	20.0%	25.0%	30.4%	22.2%	.0%	.0%	%	26.4%
White	13.8%	15.9%	9.4%	13.2%	11.8%	12.9%	12.2%	7.0%	12.5%
Not Available	6.7%	20.0%	52.6%	50.0%	.0%	11.1%	42.9%	44.4%	33.0%
Not Applicable	%	%	%	.0%	%	0%	0%	%	.0%
Average	14.4%	16.4%	12.0%	18.0%	12.5%	12.1%	13.7%	10.5%	14.3%
Non-Hispanic	13.2%	15.5%	10.1%	16.1%	12.5%	12.3%	12.1%	8.1%	13.0%
Hispanic	50.0%	50.0%	50.0%	.0%	.0%	.0%	.0%	.0%	17.6%

Table 33.C.8
Loan Applications by Selected Action Taken by Race/Ethnicity of Applicant
 33. City of Kent
 2004–2011 HMDA Data

Race		2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Originated	1	0	0	1	0	0	0	0	2
	Denied	0	0	0	3	0	0	0	0	3
	Denial Rate	.0%	%	%	75.0%	%	%	%	%	60.0%
Asian	Originated	5	8	7	3	2	4	0	0	29
	Denied	1	2	0	1	1	0	0	0	5
	Denial Rate	16.7%	20.0%	.0%	25.0%	33.3%	.0%	%	%	14.7%
Black	Originated	4	12	9	16	7	3	2	0	53
	Denied	4	3	3	7	2	0	0	0	19
	Denial Rate	50.0%	20.0%	25.0%	30.4%	22.2%	.0%	.0%	%	26.4%
White	Originated	249	238	289	210	135	101	101	80	1,403
	Denied	40	45	30	32	18	15	14	6	200
	Denial Rate	13.8%	15.9%	9.4%	13.2%	11.8%	12.9%	12.2%	7.0%	12.5%
Not Available	Originated	14	12	9	10	3	8	4	5	65
	Denied	1	3	10	10	0	1	3	4	32
	Denial Rate	6.7%	20.0%	52.6%	50.0%	.0%	11.1%	42.9%	44.4%	33.0%
Not Applicable	Originated	0	0	0	1	0	0	0	0	1
	Denied	0	0	0	0	0	0	0	0	0
	Denial Rate	6.7%	20.0%	52.6%	50.0%	.0%	11.1%	42.9%	44.4%	.0%
Total	Originated	273	270	314	241	147	116	107	85	1,553
	Denied	46	53	43	53	21	16	17	10	259
	Denial Rate	14.4%	16.4%	12.0%	18.0%	12.5%	12.1%	13.7%	10.5%	14.3%
Non-Hispanic	Originated	244	257	304	224	140	107	102	79	1,457
	Denied	37	47	34	43	20	15	14	7	217
	Denial Rate	13.2%	15.5%	10.1%	16.1%	12.5%	12.3%	12.1%	8.1%	13.0%
Hispanic	Originated	1	1	1	3	4	2	1	1	14
	Denied	1	1	1	0	0	0	0	0	3
	Denial Rate	50.0%	50.0%	50.0%	.0%	.0%	.0%	.0%	.0%	17.6%

Table 33.C.9
Loan Applications by Reason for Denial
 33. City of Kent
 2004–2011 HMDA Data

Denial Reason	2004	2005	2006	2007	2008	2009	2010	2011	Total
Debt-to-Income Ratio	3	6	6	11	3	3	5	2	39
Employment History	1	2	0	0	2	0	0	0	5
Credit History	8	10	13	10	3	2	1	4	51
Collateral	1	3	5	5	3	3	3	1	24
Insufficient Cash	0	4	0	0	1	0	0	1	6
Unverifiable Information	0	0	2	2	0	0	1	0	5
Credit Application Incomplete	4	5	0	4	1	3	5	0	22
Mortgage Insurance Denied	0	0	0	0	0	0	0	0	0
Other	12	11	8	10	4	2	2	0	49
Missing	17	12	9	11	4	3	0	2	58
Total	46	53	43	53	21	16	17	10	259

Table 33.C.10
Denial Rates by Income of Applicant
 33. City of Kent
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	40.0%	%	40.0%	60.0%	%	.0%	66.7%	100.0%	50.0%
\$15,001–\$30,000	25.8%	36.0%	23.3%	46.7%	31.3%	15.4%	36.4%	.0%	29.2%
\$30,001–\$45,000	15.4%	27.9%	19.4%	20.5%	5.4%	15.0%	10.3%	22.2%	18.1%
\$45,001–\$60,000	14.5%	15.0%	11.2%	14.0%	15.2%	9.4%	13.6%	16.7%	13.5%
\$60,001–\$75,000	10.4%	10.2%	3.3%	2.0%	6.1%	11.8%	6.3%	.0%	6.3%
Above \$75,000	4.8%	6.6%	8.8%	12.5%	10.3%	7.5%	6.1%	8.6%	8.6%
Data Missing	33.3%	20.0%	6.7%	50.0%	100.0%	%	33.3%	%	24.4%
Total	14.4%	16.4%	12.0%	18.0%	12.5%	12.1%	13.7%	10.5%	14.3%

Table 33.C.11
Denial Rates of Loans by Race/Ethnicity and Income of Applicant
 33. City of Kent
 2004–2011 HMDA Data

Race	<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	Above \$75K	Data Missing	Average
American Indian	%	%	%	75.0%	%	.0%	%	60.0%
Asian	%	66.7%	.0%	20.0%	16.7%	.0%	.0%	14.7%
Black	%	80.0%	30.8%	16.7%	15.4%	27.3%	.0%	26.4%
White	30.8%	25.0%	17.0%	12.4%	4.8%	7.0%	20.5%	12.5%
Not Available	85.7%	62.5%	33.3%	14.3%	17.6%	25.0%	100.0%	33.0%
Not Applicable	%	%	%	%	%	.0%	%	.0%
Average	50.0%	29.2%	18.1%	13.5%	6.3%	8.6%	24.4%	14.3%
Non-Hispanic Ethnicity	27.3%	27.0%	17.4%	13.5%	5.0%	7.8%	12.8%	13.0%
Hispanic (Ethnicity)	.0%	100.0%	16.7%	.0%	.0%	25.0%	%	17.6%

Table 33.C.12
Loan Applications by Reason for Denial by Race/Ethnicity of Applicant

33. City of Kent
 2004–2011 HMDA Data

Denial Reason	American Indian	Asian	Black	White	Not Available	Not Applicable	Total	Hispanic (Ethnicity)
Debt-to-Income Ratio	0	1	3	27	8	0	39	0
Employment History	0	0	0	5	0	0	5	0
Credit History	0	1	1	43	6	0	51	0
Collateral	0	0	0	23	1	0	24	1
Insufficient Cash	0	2	2	1	1	0	6	0
Unverifiable Information	1	0	0	4	0	0	5	0
Credit Application Incomplete	1	0	1	18	2	0	22	0
Mortgage Insurance Denied	0	0	0	0	0	0	0	0
Other	0	1	7	37	4	0	49	0
Missing	1	0	5	42	10	0	58	2
Total	3	5	19	200	32	0	259	3
% Missing	33.3%	.0%	26.3%	21.0%	31.3%	%	22.4%	66.7%

Table 33.C.13
Loan Applications by Income of Applicant: Originated and Denied

33. City of Kent
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Loan Originated	3	0	3	2	0	1	1	0	10
	Application Denied	2	0	2	3	0	0	2	1	10
	Denial Rate	40.0%	%	40.0%	60.0%	%	.0%	66.7%	100.0%	50.0%
\$15,001–\$30,000	Loan Originated	23	16	23	16	11	11	7	12	119
	Application Denied	8	9	7	14	5	2	4	0	49
	Denial Rate	25.8%	36.0%	23.3%	46.7%	31.3%	15.4%	36.4%	.0%	29.2%
\$30,001–\$45,000	Loan Originated	66	49	54	66	35	34	26	14	344
	Application Denied	12	19	13	17	2	6	3	4	76
	Denial Rate	15.4%	27.9%	19.4%	20.5%	5.4%	15.0%	10.3%	22.2%	18.1%
\$45,001–\$60,000	Loan Originated	71	68	79	43	28	29	19	15	352
	Application Denied	12	12	10	7	5	3	3	3	55
	Denial Rate	14.5%	15.0%	11.2%	14.0%	15.2%	9.4%	13.6%	16.7%	13.5%
\$60,001–\$75,000	Loan Originated	43	44	58	49	31	15	15	13	268
	Application Denied	5	5	2	1	2	2	1	0	18
	Denial Rate	10.4%	10.2%	3.3%	2.0%	6.1%	11.8%	6.3%	.0%	6.3%
Above \$75,000	Loan Originated	59	85	83	63	42	26	37	31	426
	Application Denied	3	6	8	9	6	3	3	2	40
	Denial Rate	4.8%	6.6%	8.8%	12.5%	12.5%	10.3%	7.5%	6.1%	8.6%
Data Missing	Loan Originated	8	8	14	2	0	0	2	0	34
	Application Denied	4	2	1	2	1	0	1	0	11
	Denial Rate	33.3%	20.0%	6.7%	50.0%	100.0%	%	33.3%	%	24.4%
Total	Loan Originated	273	270	314	241	147	116	107	85	1,553
	Application Denied	46	53	43	53	21	16	17	10	259
	Denial Rate	14.4%	16.4%	12.0%	18.0%	12.5%	12.1%	13.7%	10.5%	14.3%

Table 33.C.14
Loan Applications by Income and Race/Ethnicity of Applicant: Originated and Denied

33. City of Kent
 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	1	0	1	0	2
	Application Denied	0	0	0	3	0	0	0	3
	Denial Rate	%	%	%	75.0%	%	.0%	%	60.0%
Asian	Loan Originated	0	1	4	8	5	9	2	29
	Application Denied	0	2	0	2	1	0	0	5
	Denial Rate	%	66.7%	.0%	20.0%	16.7%	.0%	.0%	14.7%
Black	Loan Originated	0	1	9	15	11	16	1	53
	Application Denied	0	4	4	3	2	6	0	19
	Denial Rate	%	80.0%	30.8%	16.7%	15.4%	27.3%	.0%	26.4%
White	Loan Originated	9	114	317	310	238	384	31	1,403
	Application Denied	4	38	65	44	12	29	8	200
	Denial Rate	30.8%	25.0%	17.0%	12.4%	4.8%	7.0%	20.5%	12.5%
Not Available	Loan Originated	1	3	14	18	14	15	0	65
	Application Denied	6	5	7	3	3	5	3	32
	Denial Rate	85.7%	62.5%	33.3%	14.3%	17.6%	25.0%	100.0%	33.0%
Not Applicable	Loan Originated	0	0	0	0	0	1	0	1
	Application Denied	0	0	0	0	0	0	0	0
	Denial Rate	%	%	%	%	%	.0%	%	.0%
Total	Loan Originated	10	119	344	352	268	426	34	1,553
	Application Denied	10	49	76	55	18	40	11	259
	Denial Rate	50.0%	29.2%	18.1%	13.5%	6.3%	8.6%	24.4%	14.3%
Non-Hispanic Ethnicity	Loan Originated	8	116	322	328	249	400	34	1,457
	Application Denied	3	43	68	51	13	34	5	217
	Denial Rate	27.3%	27.0%	17.4%	13.5%	5.0%	7.8%	12.8%	13.0%
Hispanic (Ethnicity)	Loan Originated	1	0	5	2	3	3	0	14
	Application Denied	0	1	1	0	0	1	0	3
	Denial Rate	.0%	100.0%	16.7%	.0%	.0%	25.0%	%	17.6%

PREDATORY LENDING

Table 33.C.15
Originated Owner-Occupied Loans by HAL Status

33. City of Kent
 2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Other	247	212	265	212	134	113	107	84	1,374
HAL	26	58	49	29	13	3	0	1	179
Total	273	270	314	241	147	116	107	85	1,553
Percent HAL	9.5%	21.5%	15.6%	12.0%	8.8%	2.6%	.0%	1.2%	11.5%

Table 33.C.16
Loans by Loan Purpose by HAL Status

33. City of Kent
 2004–2011 HMDA Data

Loan Purpose		2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	Other	247	212	265	212	134	113	107	84	1,374
	HAL	26	58	49	29	13	3	0	1	179
	Percent HAL	9.5%	21.5%	15.6%	12.0%	8.8%	2.6%	.0%	1.2%	11.5%
Home Improvement	Other	21	23	25	21	19	7	7	9	132
	HAL	11	13	8	9	3	0	2	3	49
	Percent HAL	34.4%	36.1%	24.2%	30.0%	13.6%	.0%	22.2%	25.0%	27.1%
Refinancing	Other	258	186	165	140	119	247	254	198	1,567
	HAL	47	67	61	28	5	19	2	0	229
	Percent HAL	15.4%	26.5%	27.0%	16.7%	4.0%	7.1%	.8%	.0%	12.8%
Total	Other	526	421	455	373	272	367	368	291	3,073
	HAL	84	138	118	66	13	3	0	1	457
	Percent HAL	13.8%	24.7%	20.6%	15.0%	7.2%	5.7%	1.1%	1.4%	12.9%

Table 33.C.17
HALs Originated by Race of Borrower

33. City of Kent
 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	0	0	0	0	0	0	0	0	0
Black	0	7	0	4	0	0	0	0	11
White	23	47	49	22	13	3	0	1	158
Not Available	3	4	0	2	0	0	0	0	9
Not Applicable	0	0	0	0	0	0	0	0	0
Total	26	58	49	29	13	3	0	1	179
Hispanic (Ethnicity)	0	0	0	2	0	0	0	0	2

Table 33.C.18
Rate of HALs Originated by Race/Ethnicity of Borrower

33. City of Kent
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	.0%	%	%	100.0%	%	%	%	%	50.0%
Asian	.0%	.0%	.0%	.0%	.0%	.0%	%	%	.0%
Black	.0%	58.3%	.0%	25.0%	.0%	.0%	.0%	%	20.8%
White	9.2%	19.7%	17.0%	10.5%	9.6%	3.0%	.0%	1.3%	11.3%
Not Available	21.4%	33.3%	.0%	20.0%	.0%	.0%	.0%	.0%	13.8%
Not Applicable	%	%	%	.0%	%	%	%	%	0%
Average	9.5%	21.5%	15.6%	12.0%	8.8%	2.6%	0.0%	01.2%	11.5%
Non-Hispanic Ethnicity	9.4%	21.0%	16.1%	12.1%	9.3%	2.8%	%	1.3%	%
Hispanic (Ethnicity)	.0%	.0%	.0%	66.7%	.0%	.0%	.0%	.0%	14.3%

Table 33.C.19
Loans by HAL Status by Race/Ethnicity of Borrower
 33. City of Kent
 2004–2011 HMDA Data

Race	Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Other	1	0	0	0	0	0	0	0	1
	HAL	0	0	0	1	0	0	0	0	1
	Percent HAL	.0%	%	%	100.0%	%	%	%	%	50.0%
Asian	Other	5	8	7	3	2	4	0	0	29
	HAL	0	0	0	0	0	0	0	0	0
	Percent HAL	.0%	.0%	.0%	.0%	.0%	.0%	%	%	.0%
Black	Other	4	5	9	12	7	3	2	0	42
	HAL	0	7	0	4	0	0	0	0	11
	Percent HAL	.0%	58.3%	.0%	25.0%	.0%	.0%	.0%	%	20.8%
White	Other	226	191	240	188	122	98	101	79	1,245
	HAL	23	47	49	22	13	3	0	1	158
	Percent HAL	9.2%	19.7%	17.0%	10.5%	9.6%	3.0%	0.0%	01.3%	11.3%
Not Available	Other	11	8	9	8	3	8	4	5	56
	HAL	3	4	0	2	0	0	0	0	9
	Percent HAL	21.4%	33.3%	.0%	20.0%	.0%	.0%	.0%	.0%	13.8%
Not Applicable	Other	0	0	0	1	0	0	0	0	1
	HAL	0	0	0	0	0	0	0	0	0
	Percent HAL	%	%	%	.0%	%	%	%	%	0.0%
Total	Other	247	212	265	212	134	113	107	84	1,374
	HAL	26	58	49	29	13	3	0	1	179
	Percent HAL	9.5%	21.5%	15.6%	12.0%	8.8%	2.6%	.0%	1.2%	11.5%
Non-Hispanic Ethnicity	Other	221	203	255	197	127	104	102	78	1,287
	HAL	23	54	49	27	13	3		1	
	Percent HAL	9.4%	21.0%	16.1%	12.1%	9.3%	2.8%	%	1.3%	%
Hispanic (Ethnicity)	Other	1	1	1	1	4	2	1	1	12
	HAL	0	0	0	2	0	0	0	0	2
	Percent HAL	.0%	.0%	.0%	66.7%	.0%	.0%	.0%	.0%	14.3%

Table 33.C.20
Rates of HALs by Income of Borrower
 33. City of Kent
 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	4.3%	12.5%	21.7%	12.5%	36.4%	9.1%	.0%	.0%	12.6%
\$30,001–\$45,000	16.7%	26.5%	14.8%	19.7%	8.6%	5.9%	.0%	.0%	14.5%
\$45,001–\$60,000	11.3%	23.5%	13.9%	14.0%	3.6%	.0%	.0%	.0%	11.9%
\$60,001–\$75,000	.0%	29.5%	6.9%	8.2%	6.5%	.0%	.0%	7.7%	9.0%
Above \$75,000	6.8%	15.3%	16.9%	6.3%	7.1%	.0%	0.0%	.0%	8.9%
Data Missing	25.0%	12.5%	50.0%	.0%	%	%	.0%	%	29.4%
Average	9.5%	21.5%	15.6%	12.0%	8.8%	2.6%	.0%	1.2%	11.5%

Table 33.C.21
Loans by HAL Status by Income of Borrower
 33. City of Kent
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Other	3	0	3	2	0	1	1	0	10
	HAL	0	0	0	0	0	0	0	0	0
	Percent HAL	.0%	%	.0%	.0%	%	.0%	.0%	%	.0%
\$15,001–\$30,000	Other	22	14	18	14	7	10	7	12	104
	HAL	1	2	5	2	4	1	0	0	15
	Percent HAL	4.3%	12.5%	21.7%	12.5%	36.4%	9.1%	.0%	.0%	12.6%
\$30,001–\$45,000	Other	55	36	46	53	32	32	26	14	294
	HAL	11	13	8	13	3	2	0	0	50
	Percent HAL	16.7%	26.5%	14.8%	19.7%	8.6%	5.9%	.0%	.0%	14.5%
\$45,001 – \$60,000	Other	63	52	68	37	27	29	19	15	310
	HAL	8	16	11	6	1	0	0	0	42
	Percent HAL	11.3%	23.5%	13.9%	14.0%	3.6%	.0%	.0%	.0%	11.9%
\$60,001–\$75,000	Other	43	31	54	45	29	15	15	12	244
	HAL	0	13	4	4	2	0	0	1	24
	Percent HAL	.0%	29.5%	6.9%	8.2%	6.5%	.0%	.0%	7.7%	9.0%
Above \$75,000	Other	55	72	69	59	39	26	37	31	388
	HAL	4	13	14	4	3	0	0	0	38
	Percent HAL	6.8%	15.3%	16.9%	6.3%	7.1%	.0%	.0%	.0%	8.9%
Data Missing	Other	6	7	7	2	0	0	2	0	24
	HAL	2	1	7	0	0	0	0	0	10
	Percent HAL	25.0%	12.5%	50.0%	.0%	%	%	.0%	%	29.4%
Total	Other	247	212	265	212	134	113	107	84	1,374
	HAL	26	58	49	29	13	3	0	1	179
	Percent HAL	9.5%	21.5%	15.6%	12.0%	8.8%	2.6%	.0%	1.2%	11.5%

D. CRA DATA

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

Table 33.D.1
Small Business Loans Originated: \$100,000 or Less by Tract MFI
 33. City of Kent
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000			170			170
2001			242			242
2002			302			302
2003		32	436			468
2004		39	354			393
2005		47	328			375
2006		56	485			541
2007		68	560			628
2008		73	394			467
2009		27	166			193
2010		22	136			158
2011		20	168			188
Total	0	384	3,741	0	0	4,125
Loan Amount (\$1,000s)						
2000			2,087			2,087
2001			3,090			3,090
2002			3,643			3,643
2003		295	5,033			5,328
2004		335	4,193			4,528
2005		392	4,264			4,656
2006		337	4,794			5,131
2007		534	5,866			6,400
2008		712	4,117			4,829
2009		324	2,230			2,554
2010		329	2,378			2,707
2011		217	2,192			2,409
Total	0	3,475	43,887	0	0	47,362

Table 33.D.2
Small Business Loans Originated: \$100,001 to \$250,000 by Tract MFI
 33. City of Kent
 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			6
2001			19			19
2002			17			17
2003		1	20			21
2004		1	20			21
2005		0	17			17
2006		1	10			11
2007		0	15			15
2008		0	17			17
2009		0	11			11
2010		0	14			14
2011		0	8			8
Total	0	3	174	0	0	177
Loan Amount (\$1,000s)						
2000			892			892
2001			3,499			3,499
2002			3,163			3,163
2003		150	3,243			3,393
2004		200	3,624			3,824
2005		0	3,186			3,186
2006		250	2,080			2,330
2007		0	3,164			3,164
2008		0	3,004			3,004
2009		0	2,062			2,062
2010		0	2,556			2,556
2011		0	1,256			1,256
Total	0	600	31,729	0	0	32,329

Table 33.D.3
Small Business Loans Originated: More than \$250,000 by Tract MFI
 33. City of Kent
 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			7
2001			11			11
2002			13			13
2003		1	16			17
2004		1	9			10
2005		2	12			14
2006		0	3			3
2007		1	8			9
2008		2	9			11
2009		0	8			8
2010		0	6			6
2011		0	7			7
Total	0	7	109	0	0	116
Loan Amount (\$1,000s)						
2000			3,659			3,659
2001			5,502			5,502
2002			6,978			6,978
2003		435	9,121			9,556
2004		300	4,133			4,433
2005		850	6,136			6,986
2006		0	1,850			1,850
2007		554	4,158			4,712
2008		900	4,826			5,726
2009		0	4,288			4,288
2010		0	3,270			3,270
2011		0	4,901			4,901
Total	0	3,039	58,822	0	0	61,861

Table 33.D.4
Small Business Loans to Businesses with Gross Annual Revenues of Less Than \$1 Million by Tract MFI
 33. City of Kent
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000			80			80
2001			115			115
2002			107			107
2003		13	134			147
2004		15	115			130
2005		24	150			174
2006		20	188			208
2007		21	213			234
2008		21	136			157
2009		13	58			71
2010		7	49			56
2011		6	66			72
Total	0	140	1,411	0	0	1,551
Loan Amount (\$1,000s)						
2000			2,770			2,770
2001			6,267			6,267
2002			5,640			5,640
2003		167	5,837			6,004
2004		93	2,467			2,560
2005		528	3,374			3,902
2006		162	3,673			3,835
2007		239	5,076			5,315
2008		810	2,645			3,455
2009		220	1,599			1,819
2010		235	1,679			1,914
2011		77	2,280			2,357
Total	0	2,531	43,307	0	0	45,838

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 33.E.1
Fair Housing Complaints by Basis
33. City of Kent
2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color										
Disability		3	5	5	2	5	3			23
Family Status		1	1	3	1	1	3	1		11
National Origin			1				1			2
Race	1	1		3			1	1		7
Religion		1								1
Sex	1		2	1	1		1			6
Total Bases	2	6	9	12	4	6	9	2		50
Total Complaints	1	4	9	11	3	6	8	2		44

Table 33.E.2
Fair Housing Complaints by Issue
33. City of Kent
2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Failure to make reasonable accommodation			1	2		1	2	3		9
Discriminatory refusal to rent					3		1	1		5
Discriminatory refusal to rent and negotiate for rental			1		1		2	1		5
Discriminatory advertising, statements, and notices						1		2		3
Other discriminatory acts				2	1					3
Discriminatory advertisement - rental					1				1	2
Discriminatory terms, conditions, privileges, or services and facilities			1	2	6		1	2		12
Discrimination in terms, conditions or privileges relating to rental		1	1	4	1		1	2		10
Discriminatory financing (includes real estate transactions)						1				1
Discrimination in the terms or conditions for making loans								1		1
Discriminatory brokerage service							1			1
Discrimination in terms, conditions, privileges relating to sale						1				1
Discrimination in services and facilities relating to rental									1	1
Discriminatory acts under Section 818 (coercion, etc.)				1						1
Total Issues	1	4	10	14	4	7	13	2	0	55
Total Complaints	1	4	9	11	3	6	8	2		44

Table 33.E.3
Fair Housing Complaints by Closure Status
 33. City of Kent
 2004–2012 HUD Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Administrative Closure			1	1						2
Cause (FHAP)		1	1	3		1	2	1		9
Conciliated / Settled		2	5	4	2	5	4	1		23
No Cause	1	1	2	3	1					8
Open							2			2
Total Complaints	1	4	9	11	3	6	8	2		44

HUD Complaints Found With Cause

Table 33.E.4
Fair Housing Complaints Found With Cause by Basis
 33. City of Kent
 2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability		3	4	4	1	5	1			18
Family Status		1	1	1	1	1	3	1		9
National Origin			1				1			2
Race		1					1	1		3
Sex				1			1			2
Total Bases		5	6	6	2	6	7	2		34
Total Complaints		3	6	7	2	6	6	2		32

Table 33.E.5
Fair Housing Complaints Found With Cause by Issue
 33. City of Kent
 2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Discriminatory terms, conditions, privileges, or services and facilities			1	2	5		1			9
Failure to make reasonable accommodation			1	2		1	2	1		7
Discrimination in terms, conditions or privileges relating to rental				3			1	2		6
Discriminatory refusal to rent				3			1	1		5
Discriminatory refusal to rent and negotiate for rental		1					2	1		4
Discriminatory advertising, statements, and notices					1		2			3
Discriminatory advertisement - rental					1			1		2
Discrimination in the terms or conditions for making loans							1			1
Discriminatory brokerage service							1			1
Discrimination in services and facilities relating to rental								1		1
Total Issues	0	3	7	9	2	7	9	2	0	39
Total Complaints		3	6	7	2	6	6	2		32

OHIO CIVIL RIGHTS COMMISSION COMPLAINTS

Table 33.E.6
Fair Housing Complaints by Basis
 33. City of Kent
 2004–2012 OCRC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color							1			1
Disability		2	5	5	1	4	5	1		23
Family Status			1	1			3			5
Gender	1		4	2	1					8
National Origin			1							1
Race	1		1	1		2	2	1		6
Religion		1								1
Retaliation	1		3	1		3	1	49		58
Other				2						2
Total Bases	3	3	15	12	2	7	12	51	0	105
Total Complaints	2	3	10	7	1	4	7	51		85

Table 33.E.7
Fair Housing Complaints by Issue
 33. City of Kent
 2004–2012 OCRC Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Advertising				1						1
Harassment			2			1				3
Intimidation				1			1			2
Other		1	1			2	3	27		34
Reasonable Accommodation		1	2	2			4	1		10
Sexual Harassment	1		2							3
Terms and Conditions	1	1	8	5	1	2	3	23		44
Total Issues	2	3	15	9	1	5	11	51	0	97
Total Complaints	2	3	10	7	1	4	7	51		85

Table 33.E.8
Fair Housing Complaints by Closure Status
 33. City of Kent
 2004–2012 OCRC Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Administrative Closure							2			2
CP Withdrawal – No Benefit			1			1				2
No Cause Finding Issued	2	1	4	3	1	1	2	2		16
Settlement With Benefits		2	5	3		2	3			15
Withdrawal With Benefits				1				49		50
Total Complaints	2	3	10	7	1	4	7	51	0	85

FAIR HOUSING CONTACT SERVICE COMPLAINTS

Table 33.E.9
Fair Housing Complaints by Basis
 33. City of Kent
 2004–2012 FHCS Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color			1	1						2
Criminal Background					1					1
Disability			7	6	6	10	6	7	2	44
Familial Status			3	3	2	3	5			16
Harassment					1					1
National Origin			1						1	2
Race	1		4	7	3		2	2		19
Retaliation					1	3	2		1	7
Sex			1	1	1	1				4
Other				1	1	1	2		1	6
None			1							1
Total Bases	1	0	18	19	16	18	17	9	5	103
Total Complaints	1		14	14	10	14	14	10	5	82

Table 33.E.10
Fair Housing Complaints by Closure Status
 33. City of Kent
 2004–2012 FHCS Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Closed			7	2	1	4	2	1		17
Elected not to pursue						2				2
Independently resolved						2	1			3
Inquiry			3	6	7				1	17
Lack of jurisdiction									1	1
No contact							3	5	2	10
No probable cause				1		1	2	1		5
Pending				3						3
Probable cause			1	1		1	1			4
Reasonable accommodation granted							1	1		2
Reasonable modification granted								2		2
Referred for other assistance							3		1	4
Settled			3	1	2	4	1			11
Missing	1									1
Total Complaints	1	0	14	14	10	14	14	10	5	82

THE HOUSING RESEARCH AND ADVOCACY CENTER COMPLAINTS

Table 33.E.11
Fair Housing Complaints by Basis

33 City of Kent
2004–2012 HRAC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Race							1			1
Sex							1			1
Total Bases	0	0	0	0	0	0	2	0	0	2
Total Complaints							2			2

Table 33.E.12
Fair Housing Complaints by Issue

33 City of Kent
2004–2012 HRAC Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Rental							2			2
Total	0	0	0	0	0	0	2	0	0	2
Total Complaints							2			2

Table 33.E.13
Fair Housing Complaints by Action Taken

33 City of Kent
2004–2012 HRAC Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Referred to OCRC							1			1
Missing Action							1			1
Total	0	0	0	0	0	0	2	0	0	2
Total Complaints							2			2

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 33.F.1
Primary Role of Respondent

33. City of Kent
2012–2013 Fair Housing Survey for Housing
Stakeholders Data

Primary Role	Total
Advocate/Service Provider	4
Local Government	2
Property Management	2
Other Role	1
Total	9

FEDERAL, STATE, AND LOCAL LAWS

Table 33.F.2
Familiarity with Fair
Housing Laws

33. City of Kent
2012–2013 Fair Housing Survey
for Housing Stakeholders Data

Familiarity	Total
Not Familiar	0
Somewhat Familiar	2
Very Familiar	5
Missing	2
Total	9

Table 33.F.3
Perceptions About Fair Housing Laws

33. City of Kent
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?	7			2	9
Are fair housing laws difficult to understand or follow?	2	5		2	9
Do you think fair housing laws should be changed?		5	2	2	9
Do you thing fair housing laws are adequately enforced?	6	1		2	9

Table 33.F.4
Fair Housing Activities

33. City of Kent
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		2	9
Have you participated in fair housing training?		6	1		2	9
Are you aware of any fair housing testing?		3	4		2	9
Testing and education	Too Little	Right Amount	Too Much	Don't Know	Missing	Total
Is there sufficient outreach and education activity?	3	4			2	9
Is there sufficient testing?	2	2		3	2	9

Table 33.F.5

Protected Classes

33. City of Kent
2012–2013 Fair Housing Survey
for Housing Stakeholders Data

Protected Class	Total
Family Status	3
Religion	2
Gender	1
National Origin	1
Color	2
Age	1
Military	2
Disability	1
Ancestry	1
Other	1
Total	15

Table 33.F.6

Fair Housing Violation Referrals

33. City of Kent
2012–2013 Fair Housing Survey for
Housing Stakeholders Data

Referral	Total
Fair Housing Contact Service	7
Total	7

LOCAL FAIR HOUSING

Table 33.F.7

Local Fair Housing

33. City of Kent
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	1	4	9
Are there any specific geographic areas that have fair housing problems?		3	2	4	9
Are there any specific groups in that face housing discrimination?	2	2	1	4	9

FAIR HOUSING IN THE PRIVATE SECTOR

Table 33.F.8

Barriers to Fair Housing in the Private Sector

33. City of Kent

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	2	1	3	9
The real estate industry?		4	2	3	9
The mortgage and home lending industry?		4	2	3	9
The housing construction or accessible housing design fields?	1	4	1	3	9
The home insurance industry?		4	2	3	9
The home appraisal industry?		3	2	4	9
Any other housing services?		4	2	3	9

FAIR HOUSING IN THE PUBLIC SECTOR

Table 33.F.9

Barriers to Fair Housing in the Public Sector

33. City of Kent

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	4	9
Zoning laws?		3	2	4	9
Occupancy standards or health and safety codes?		3	2	4	9
Property tax policies?		3	2	4	9
Permitting process?		3	2	4	9
Housing construction standards?		3	2	4	9
Neighborhood or community development policies?		2	3	4	9
Limited access to government services, such as employment services?		5		4	9
Public administrative actions or regulations?		5		4	9

NARRATIVE COMMENTS

Federal, State, and Local Laws

Table 33.F.10

How did you become aware of fair housing laws?

33. City of Kent

2013 Fair Housing Survey Data

Comments:
<p>Been involved with low income housing for 15 years, training in various settings</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 have worked with the Fair Housing Board and Community Legal Aid with regard to housing issues.</p> <p>Through my work and multiple trainings on the topic.</p>

Local Fair Housing

Table 33.F.11

Are there any specific groups in that face housing discrimination?

33. City of Kent

2013 Fair Housing Survey Data

Comments:
<p>Mental illness</p>

Persons with disabilities

Fair Housing in the Private Sector**Table 33.F.12****Are you aware of any questionable practices or barriers to fair housing choice in the rental housing market?**

33. City of Kent

2013 Fair Housing Survey Data

Comments:

Difficulties faced by persons with disabilities

Obtaining affordable housing is a barrier to the poor and working poor.

Refusal to rent to people who are affiliated with the local mental health agency (discrimination based on disability).

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 33.G.1
Housing Development
 33. City of Kent
 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"?	No
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?	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?	Don't know
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 Kent. 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 Kent.

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 Kent.

Results of the Fair Housing Surveys indicate that Kent does not have sufficient policies or practices to completely address the duty to affirmatively further fair housing.

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 Kent. 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:* Decisions regarding definitions of “family,” “dwelling unit,” and related terms

Decisions made by the City of Kent 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 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. Encourage adoption.

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 in Kent. 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 33.H.1
Impediments Matrix
 33. City of Kent
 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 ³⁸		
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	Decisions regarding definitions of "family," "dwelling unit," and related terms									X	Disabled persons, families	L
5	Lack of inclusionary policies							X		X	All	M

³⁸ 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.

34. REMAINDER OF PORTAGE COUNTY

A. CENSUS BUREAU DATA

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

Table 34.A.1

Population by Age

34. Remainder of Portage County
2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Under 5	7,900	6.4%	6,983	5.3%	-11.6%
5 to 19	27,034	21.8%	26,284	19.8%	-2.8%
20 to 24	7,249	5.8%	8,807	6.6%	21.5%
25 to 34	15,735	12.7%	14,372	10.8%	-8.7%
35 to 54	39,661	31.9%	39,649	29.9%	.0%
55 to 64	11,993	9.7%	17,744	13.4%	48.0%
65 or Older	14,583	11.7%	18,676	14.1%	28.1%
Total	124,155	100.0%	132,515	100.0%	6.7%

Table 34.A.2

Elderly Population by Age

34. Remainder of Portage County
2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
65 to 66	1,917	13.1%	2,604	13.9%	35.8%
67 to 69	2,657	18.2%	3,559	19.1%	33.9%
70 to 74	3,872	26.6%	4,458	23.9%	15.1%
75 to 79	2,948	20.2%	3,440	18.4%	16.7%
80 to 84	1,776	12.2%	2,522	13.5%	42.0%
85 or Older	1,413	9.7%	2,093	11.2%	48.1%
Total	14,583	100.0%	18,676	100.0%	28.1%

Table 34.A.3

Population by Race and Ethnicity

34. Remainder of Portage County
2000 & 2010 Census SF1 Data

Race	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
White	119,527	96.3%	124,917	94.3%	4.5%
Black	2,299	1.9%	3,905	2.9%	69.9%
American Indian	224	.2%	244	.2%	8.9%
Asian	647	.5%	1,240	.9%	91.7%
Native Hawaiian/ Pacific Islander	11	.0%	23	.0%	109.1%
Other	204	.2%	279	.2%	36.8%
Two or More Races	1,243	1.0%	1,907	1.4%	53.4%
Total	124,155	100.0%	132,515	100.0%	6.7%
Non-Hispanic	123,419	99.4%	131,084	98.9%	6.2%
Hispanic	736	.6%	1,431	1.1%	94.4%

Table 34.A.4**Disability by Age**34. Remainder of Portage 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%	64	1.9%	64	.9%
5 to 17	1,204	10.4%	423	3.9%	1,627	7.3%
18 to 34	916	6.5%	457	3.6%	1,373	5.1%
35 to 64	3,470	12.3%	3,546	12.4%	7,016	12.3%
65 to 74	1,308	27.5%	1,410	26.9%	2,718	27.2%
75 or Older	1,509	47.2%	2,252	55.1%	3,761	51.6%
Total	8,407	12.8%	8,152	12.5%	16,559	12.7%

Table 34.A.5**Employment Status by Disability and Type: Age 18 to 64**34. Remainder of Portage County
2010 Three-Year ACS Data

Disability Status	Population
Employed:	61,433
With a disability:	3,181
With a hearing difficulty	1,469
With a vision difficulty	451
With a cognitive difficulty	610
With an ambulatory difficulty	810
With a self-care difficulty	132
With an independent living difficulty	394
No disability	58,252
Unemployed:	7,084
With a disability:	934
With a hearing difficulty	172
With a vision difficulty	213
With a cognitive difficulty	551
With an ambulatory difficulty	324
With a self-care difficulty	79
With an independent living difficulty	80
No disability	6,150
Not in labor force:	15,142
With a disability:	4,274
With a hearing difficulty	680
With a vision difficulty	532
With a cognitive difficulty	1,921
With an ambulatory difficulty	2,412
With a self-care difficulty	860
With an independent living difficulty	2,054
No disability	10,868
Total	83,659

Table 34.A.6**Households by Income**34. Remainder of Portage 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	4,840	10.4%	4,974	9.8%
\$15,000 to \$19,999	2,338	5.0%	2,340	4.6%
\$20,000 to \$24,999	2,884	6.2%	2,415	4.7%
\$25,000 to \$34,999	6,089	13.1%	5,569	10.9%
\$35,000 to \$49,999	8,666	18.6%	8,008	15.7%
\$50,000 to \$74,999	11,342	24.3%	10,663	20.9%
\$75,000 to \$99,999	5,619	12.0%	7,715	15.1%
\$100,000 or More	4,853	10.4%	9,280	18.2%
Total	46,631	100.0%	50,964	100.0%

Table 34.A.7**Poverty by Age**34. Remainder of Portage 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	853	11.0%	1,807	14.4%
6 to 17	1,663	21.4%	2,296	18.4%
18 to 64	4,536	58.4%	7,694	61.5%
65 or Older	721	9.3%	713	5.7%
Total	7,773	100.0%	12,510	100.0%
Poverty Rate	6.4%	.	9.7%	.

Table 34.A.8**Households by Year Home Built**34. Remainder of Portage 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	7,093	15.2%	7,416	14.6%
1940 to 1949	2,764	5.9%	2,277	4.5%
1950 to 1959	5,562	11.9%	5,645	11.1%
1960 to 1969	6,980	15.0%	5,660	11.1%
1970 to 1979	8,968	19.2%	8,429	16.5%
1980 to 1989	5,783	12.4%	5,681	11.1%
1990 to 1999	9,500	20.4%	8,769	17.2%
2000 to 2004	.	.	4,855	9.5%
2005 or Later	.	.	2,232	4.4%
Total	46,650	100.0%	50,964	100.0%

Table 34.A.9**Housing Units by Type**34. Remainder of Portage 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	36,205	72.9%	41,813	76.0%
Duplex	2,084	4.2%	2,135	3.9%
Tri- or Four-Plex	1,690	3.4%	1,737	3.2%
Apartment	4,191	8.4%	4,676	8.5%
Mobile Home	5,429	10.9%	4,668	8.5%
Boat, RV, Van, Etc.	36	.1%	0	.0%
Total	49,635	100.0%	55,029	100.0%

Table 34.A.10**Housing Units by Tenure**34. Remainder of Portage County
2000 & 2010 Census SF1 Data

Tenure	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
Occupied Housing Units	46,677	94.0%	51,934	92.2%	11.3%
Owner-Occupied	36,545	78.3%	39,671	76.4%	8.6%
Renter-Occupied	10,132	21.7%	12,263	23.6%	21.0%
Vacant Housing Units	2,984	6.0%	4,364	7.8%	46.2%
Total Housing Units	49,661	100.0%	56,298	100.0%	13.4%

Table 34.A.11**Disposition of Vacant Housing Units**34. Remainder of Portage County
2000 & 2010 Census SF1 Data

Disposition	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
For Rent	780	26.1%	1,351	31.0%	73.2%
For Sale	583	19.5%	772	17.7%	32.4%
Rented or Sold, Not Occupied	253	8.5%	317	7.3%	25.3%
For Seasonal, Recreational, or Occasional Use	661	22.2%	690	15.8%	4.4%
For Migrant Workers	6	0.2%	0	.0%	-100.0%
Other Vacant	701	23.5%	1,234	28.3%	76.0%
Total	2,984	100.0%	4,364	100.0%	46.2%

Table 34.A.12**Households by Household Size**34. Remainder of Portage County
2000 & 2010 Census SF1 Data

Size	2000 Census		2010 Census		% Change 00-10
	Households	% of Total	Households	% of Total	
One Person	9,982	21.4%	12,363	23.8%	23.9%
Two Persons	16,438	35.2%	19,084	36.7%	16.1%
Three Persons	8,146	17.5%	8,659	16.7%	6.3%
Four Persons	7,554	16.2%	7,195	13.9%	-4.8%
Five Persons	3,157	6.8%	3,138	6.0%	-.6%
Six Persons	1,015	2.2%	1,041	2.0%	2.6%
Seven Persons or More	385	.8%	454	.9%	17.9%
Total	46,677	100.0%	51,934	100.0%	11.3%

Table 34.A.13**Household Type by Tenure**34. Remainder of Portage County
2000 & 2010 Census SF1 Data

Household Type	2000 Census		2010 Census		% Change 00–10
	Households	% of Total	Households	% of Total	
Family Households	34,400	73.7%	36,256	69.8%	5.4%
Married-Couple Family	28,183	81.9%	28,338	78.2%	.5%
Owner-Occupied	25,104	89.1%	25,389	89.6%	1.1%
Renter-Occupied	3,079	10.9%	2,949	10.4%	-4.2%
Other Family	6,217	18.1%	7,918	21.8%	27.4%
Male Householder, No Spouse	1,801	29.0%	2,438	30.8%	35.4%
Owner-Occupied	1,269	70.5%	1,667	68.4%	31.4%
Renter-Occupied	532	29.5%	771	31.6%	44.9%
Female Householder, No Spouse	4,416	71.0%	5,480	69.2%	24.1%
Owner-Occupied	2,799	63.4%	3,170	57.8%	13.3%
Renter-Occupied	1,617	36.6%	2,310	42.2%	42.9%
Non-Family Households	12,277	26.3%	15,678	30.2%	27.7%
Owner-Occupied	7,373	60.1%	9,445	60.2%	28.1%
Renter-Occupied	4,904	39.9%	6,233	39.8%	27.1%
Total	46,677	100.0%	51,934	100.0%	11.3%

Table 34.A.14**Group Quarters Population**34. Remainder of Portage 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	156	16.1%	179	21.9%	14.7%
Juvenile Facilities	.	.	22	2.7%	.
Nursing Homes	650	67.0%	615	75.4%	-5.4%
Other Institutions	164	16.9%	0	.0%	-100.0%
Total	970	100.0%	816	100.0%	-15.9%
Noninstitutionalized					
College Dormitories	671	78.3%	870	84.4%	29.7%
Military Quarters	0	.0%	0	.0%	%
Other Noninstitutional	186	21.7%	161	15.6%	-13.4%
Total	857	46.9%	1,031	55.8%	20.3%
Total Group Quarters Population	1,827	100.0%	1,847	100.0%	1.1%

Table 34.A.15**Overcrowding and Severe Overcrowding**34. Remainder of Portage 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	36,208	99.2%	240	.7%	35	.1%	36,483
2010 ACS	38,386	99.5%	145	.4%	29	.1%	38,560
Renter							
2000 Census	9,943	97.8%	174	1.7%	50	.5%	10,167
2010 ACS	12,207	98.4%	166	1.3%	31	.2%	12,404
Total							
2000 Census	46,151	98.9%	414	.9%	85	.2%	46,650
2010 ACS	50,593	99.3%	311	.6%	60	.1%	50,964

Table 34.A.16
Households with Incomplete Plumbing Facilities
 34. Remainder of Portage County
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Plumbing Facilities	46,479	50,773
Lacking Complete Plumbing Facilities	171	191
Total Households	46,650	50,964
Percent Lacking	.4%	.4%

Table 34.A.17
Households with Incomplete Kitchen Facilities
 34. Remainder of Portage County
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Kitchen Facilities	46,505	50,568
Lacking Complete Kitchen Facilities	145	396
Total Households	46,650	50,964
Percent Lacking	.3%	.8%

Table 34.A.18
Cost Burden and Severe Cost Burden by Tenure
 34. Remainder of Portage 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	15,719	77.1%	3,292	16.1%	1,293	6.3%	91	.4%	20,395
2010 ACS	17,966	67.3%	5,731	21.5%	2,926	11.0%	67	.3%	26,690
Owner Without a Mortgage									
2000 Census	6,891	90.7%	466	6.1%	180	2.4%	58	.8%	7,595
2010 ACS	9,833	82.8%	1,127	9.5%	789	6.6%	121	1.0%	11,870
Renter									
2000 Census	5,937	60.3%	1,762	17.9%	1,541	15.6%	612	6.2%	9,852
2010 ACS	6,089	49.1%	2,679	21.6%	2,671	21.5%	965	7.8%	12,404
Total									
2000 Census	28,547	75.4%	5,520	14.6%	3,014	8.0%	761	2.0%	37,842
2010 ACS	33,888	66.5%	9,537	18.7%	6,386	12.5%	1,153	2.3%	50,964

Table 34.A.19
Median Housing Costs
 34. Remainder of Portage County
 2000 Census SF3 & 2010 Five-Year ACS Data

Housing Cost	2000 Census	2010 ACS
Median Contract Rent	\$11	\$26
Median Home Value	\$9,700	\$12,000

B. BLS DATA

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

Table 34.B.1
Labor Force Statistics
 34. Remainder of Portage County
 1990–2011 BLS Data

Year	Labor Force	Employment	Unemployment	Unemployment Rate	Statewide Unemployment Rate
1990	59,846	56,867	2,979	5.0%	5.7%
1991	60,627	57,211	3,416	5.6%	6.6%
1992	62,380	58,223	4,157	6.7%	7.4%
1993	62,842	59,292	3,550	5.6%	6.7%
1994	63,947	60,814	3,133	4.9%	5.6%
1995	64,638	62,024	2,614	4.0%	4.9%
1996	65,963	63,111	2,852	4.3%	5.0%
1997	65,605	63,004	2,601	4.0%	4.6%
1998	65,376	62,948	2,428	3.7%	4.3%
1999	66,175	63,624	2,551	3.9%	4.3%
2000	70,632	67,950	2,682	3.8%	4.0%
2001	70,682	67,744	2,938	4.2%	4.4%
2002	70,823	67,057	3,766	5.3%	5.7%
2003	69,876	65,578	4,298	6.2%	6.2%
2004	70,827	66,550	4,277	6.0%	6.1%
2005	72,098	67,933	4,165	5.8%	5.9%
2006	72,814	68,984	3,830	5.3%	5.4%
2007	73,784	69,731	4,053	5.5%	5.6%
2008	74,791	69,957	4,834	6.5%	6.5%
2009	75,246	67,388	7,858	10.4%	10.1%
2010	75,168	67,620	7,548	10.0%	10.0%
2011	73,950	67,543	6,407	8.7%	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.³⁹ The information presented in this section presents detailed HMDA data, including denial rates and predatory lending including high annual percentage rate (APR) loans.

Table 34.C.1

Purpose of Loan by Year

34. Remainder of Portage County
2004–2011 HMDA Data

Purpose	2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	4,079	4,763	4,473	3,259	2,167	1,995	1,905	1,824	24,465
Home Improvement	1,032	1,138	1,113	942	609	329	235	237	5,635
Refinancing	8,710	8,368	7,486	5,542	3,770	5,272	4,607	4,025	47,780
Total	13,821	14,269	13,072	9,743	6,546	7,596	6,747	6,086	77,880

Table 34.C.2

Occupancy Status for Home Purchase Loan Applications

34. Remainder of Portage County
2004–2011 HMDA Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	Total
Owner-Occupied	3,749	4,430	4,123	3,011	2,008	1,941	1,841	1,723	22,826
Not Owner-Occupied	266	276	301	199	142	50	62	99	1,395
Not Applicable	64	57	49	49	17	4	2	2	244
Total	4,079	4,763	4,473	3,259	2,167	1,995	1,905	1,824	24,465

Table 34.C.3

Owner-Occupied Home Purchase Loan Applications by Loan Type

34. Remainder of Portage County
2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Conventional	3,469	4,126	3,823	2,635	1,236	800	772	785	17,646
FHA - Insured	243	228	237	298	711	914	883	711	4,225
VA - Guaranteed	30	70	60	73	48	99	112	96	588
Rural Housing Service or Farm Service Agency	7	6	3	5	13	128	74	131	367
Total	3,749	4,430	4,123	3,011	2,008	1,941	1,841	1,723	22,826

³⁹ 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 34.C.4
Loan Applications by Action Taken
 34. Remainder of Portage County
 2004–2011 HMDA Data

Action	2004	2005	2006	2007	2008	2009	2010	2011	Total
Loan Originated	2,044	2,395	2,259	1,661	1,085	975	905	849	12,173
Application Approved but not Accepted	254	287	241	189	107	51	46	47	1,222
Application Denied	457	545	479	362	221	163	170	166	2,563
Application Withdrawn by Applicant	219	295	271	145	125	100	93	88	1,336
File Closed for Incompleteness	80	83	73	52	18	23	17	22	368
Loan Purchased by the Institution	695	823	799	602	452	628	610	551	5,160
Preapproval Request Denied	0	2	1	0	0	1	0	0	4
Preapproval Approved but not Accepted	0	0	0	0	0	0	0	0	0
Total	3,749	4,430	4,123	3,011	2,008	1,941	1,841	1,723	22,826
Denial Rate	18.3%	18.5%	17.5%	17.9%	16.9%	14.3%	15.8%	16.4%	17.4%

Table 34.C.5
Denial Rates by Gender of Applicant
 34. Remainder of Portage County
 2004–2011 HMDA Data

Year	Male	Female	Not Available	Not Applicable	Average
2004	15.9%	20.6%	44.9%	.0%	18.3%
2005	14.8%	26.7%	36.6%	.0%	18.5%
2006	15.5%	20.4%	35.1%	.0%	17.5%
2007	14.9%	23.2%	37.1%	.0%	17.9%
2008	14.8%	19.5%	35.8%	.0%	16.9%
2009	13.2%	14.7%	36.1%	%	14.3%
2010	14.1%	21.2%	11.8%	%	15.8%
2011	13.4%	21.0%	34.1%	%	16.4%
Average	14.9%	21.6%	35.2%	.0%	17.4%

Table 34.C.6
Loan Applications by Selected Action Taken by Gender of Applicant
 34. Remainder of Portage County
 2004–2011 HMDA Data

Gender		2004	2005	2006	2007	2008	2009	2010	2011	Total
Male	Originated	1,462	1,770	1,616	1,186	756	690	645	606	8,731
	Denied	276	307	297	208	131	105	106	94	1,524
	Denial Rate	15.9%	14.8%	15.5%	14.9%	14.8%	13.2%	14.1%	13.4%	14.9%
Female	Originated	527	572	581	434	294	262	215	214	3,099
	Denied	137	208	149	131	71	45	58	57	856
	Denial Rate	20.6%	26.7%	20.4%	23.2%	19.5%	14.7%	21.2%	21.0%	21.6%
Not Available	Originated	54	52	61	39	34	23	45	29	337
	Denied	44	30	33	23	19	13	6	15	183
	Denial Rate	44.9%	36.6%	35.1%	37.1%	35.8%	36.1%	11.8%	34.1%	35.2%
Not Applicable	Originated	1	1	1	2	1	0	0	0	6
	Denied	0	0	0	0	0	0	0	0	0
	Denial Rate	.0%	.0%	.0%	.0%	.0%	%	%	%	.0%
Total	Originated	2,044	2,395	2,259	1,661	1,085	975	905	849	12,173
	Denied	457	545	479	362	221	163	170	166	2,563
	Denial Rate	18.3%	18.5%	17.5%	17.9%	16.9%	14.3%	15.8%	16.4%	17.4%

Table 34.C.7
Denial Rates by Race/Ethnicity of Applicant
 34. Remainder of Portage County
 2004–2011 HMDA Data

Race/Ethnicity	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	.0%	50.0%	.0%	20.0%	66.7%	.0%	.0%	.0%	20.0%
Asian	4.5%	14.8%	32.3%	.0%	30.0%	23.1%	26.1%	22.2%	19.8%
Black	22.5%	34.4%	28.1%	38.8%	35.9%	27.3%	38.7%	23.3%	31.2%
White	16.6%	16.9%	15.5%	15.8%	14.3%	13.1%	15.0%	14.8%	15.6%
Not Available	37.8%	31.3%	33.5%	38.3%	38.6%	31.3%	14.1%	36.1%	33.5%
Not Applicable	20.0%	.0%	.0%	.0%	.0%	0%	0%	%	11.1%
Average	18.3%	18.5%	17.5%	17.9%	16.9%	14.3%	15.8%	16.4%	17.4%
Non-Hispanic	16.2%	17.0%	16.0%	16.5%	15.7%	13.6%	15.9%	15.3%	16.0%
Hispanic	30.3%	42.9%	21.4%	18.2%	20.0%	.0%	10.0%	12.5%	25.4%

Table 34.C.8
Loan Applications by Selected Action Taken by Race/Ethnicity of Applicant
 34. Remainder of Portage County
 2004–2011 HMDA Data

Race		2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Originated	1	3	8	4	1	2	4	1	24
	Denied	0	3	0	1	2	0	0	0	6
	Denial Rate	.0%	50.0%	.0%	20.0%	66.7%	.0%	.0%	.0%	20.0%
Asian	Originated	21	23	21	17	14	10	17	7	130
	Denied	1	4	10	0	6	3	6	2	32
	Denial Rate	4.5%	14.8%	32.3%	.0%	30.0%	23.1%	26.1%	22.2%	19.8%
Black	Originated	55	63	97	52	25	24	19	23	358
	Denied	16	33	38	33	14	9	12	7	162
	Denial Rate	22.5%	34.4%	28.1%	38.8%	35.9%	27.3%	38.7%	23.3%	31.2%
White	Originated	1,848	2,167	2,011	1,516	990	906	804	779	11,021
	Denied	369	442	370	284	165	136	142	135	2,043
	Denial Rate	16.6%	16.9%	15.5%	15.8%	14.3%	13.1%	15.0%	14.8%	15.6%
Not Available	Originated	115	138	121	71	54	33	61	39	632
	Denied	70	63	61	44	34	15	10	22	319
	Denial Rate	37.8%	31.3%	33.5%	38.3%	38.6%	31.3%	14.1%	36.1%	33.5%
Not Applicable	Originated	4	1	1	1	1	0	0	0	8
	Denied	1	0	0	0	0	0	0	0	1
	Denial Rate	37.8%	31.3%	33.5%	38.3%	38.6%	31.3%	14.1%	36.1%	11.1%
Total	Originated	2,044	2,395	2,259	1,661	1,085	975	905	849	12,173
	Denied	457	545	479	362	221	163	170	166	2,563
	Denial Rate	18.3%	18.5%	17.5%	17.9%	16.9%	14.3%	15.8%	16.4%	17.4%
Non-Hispanic	Originated	1,710	2,229	2,116	1,580	1,012	931	835	801	11,214
	Denied	330	457	402	313	188	146	158	145	2,139
	Denial Rate	16.2%	17.0%	16.0%	16.5%	15.7%	13.6%	15.9%	15.3%	16.0%
Hispanic	Originated	23	16	22	9	8	6	9	7	100
	Denied	10	12	6	2	2	0	1	1	34
	Denial Rate	30.3%	42.9%	21.4%	18.2%	20.0%	.0%	10.0%	12.5%	25.4%

Table 34.C.9
Loan Applications by Reason for Denial
 34. Remainder of Portage County
 2004–2011 HMDA Data

Denial Reason	2004	2005	2006	2007	2008	2009	2010	2011	Total
Debt-to-Income Ratio	51	80	66	47	49	29	39	29	390
Employment History	5	10	11	11	6	1	5	3	52
Credit History	118	124	83	83	66	50	48	39	611
Collateral	32	46	54	41	30	23	33	45	304
Insufficient Cash	12	14	3	8	2	1	4	4	48
Unverifiable Information	2	11	13	16	3	7	3	6	61
Credit Application Incomplete	36	38	33	33	13	13	11	22	199
Mortgage Insurance Denied	0	0	0	0	0	1	1	0	2
Other	60	99	85	43	8	10	13	6	324
Missing	141	123	131	80	44	28	13	12	572
Total	457	545	479	362	221	163	170	166	2,563

Table 34.C.10
Denial Rates by Income of Applicant
 34. Remainder of Portage County
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	62.5%	66.7%	45.5%	60.0%	66.7%	77.8%	85.7%	50.0%	64.0%
\$15,001–\$30,000	37.9%	43.3%	27.1%	35.0%	34.3%	22.0%	33.9%	25.2%	33.7%
\$30,001–\$45,000	23.0%	20.5%	22.2%	20.9%	21.5%	19.2%	17.6%	20.2%	21.1%
\$45,001–\$60,000	16.6%	15.0%	16.0%	15.8%	16.7%	9.1%	14.8%	17.9%	15.4%
\$60,001–\$75,000	8.1%	14.3%	15.6%	17.2%	12.2%	9.1%	8.8%	12.1%	12.8%
Above \$75,000	10.3%	11.6%	14.0%	11.7%	9.1%	10.2%	10.3%	10.8%	11.4%
Data Missing	24.1%	17.6%	12.8%	27.8%	16.7%	55.6%	100.0%	27.3%	20.8%
Total	18.3%	18.5%	17.5%	17.9%	16.9%	14.3%	15.8%	16.4%	17.4%

Table 34.C.11
Denial Rates of Loans by Race/Ethnicity and Income of Applicant
 34. Remainder of Portage County
 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%	21.4%	.0%	.0%	.0%	100.0%	20.0%
Asian	100.0%	10.0%	22.7%	35.5%	18.2%	11.0%	50.0%	19.8%
Black	66.7%	50.0%	28.0%	32.6%	28.2%	31.8%	5.3%	31.2%
White	61.1%	31.8%	19.3%	13.9%	11.3%	9.3%	18.5%	15.6%
Not Available	75.0%	56.8%	43.2%	25.8%	24.4%	23.3%	48.3%	33.5%
Not Applicable	%	.0%	%	100.0%	.0%	.0%	.0%	11.1%
Average	64.0%	33.7%	21.1%	15.4%	12.8%	11.4%	20.8%	17.4%
Non-Hispanic Ethnicity	62.5%	31.0%	19.2%	14.4%	12.1%	10.7%	17.5%	16.0%
Hispanic (Ethnicity)	100.0%	54.5%	21.9%	27.3%	8.3%	9.7%	.0%	25.4%

Table 34.C.12
Loan Applications by Reason for Denial by Race/Ethnicity of Applicant
 34. Remainder of Portage County
 2004–2011 HMDA Data

Denial Reason	American Indian	Asian	Black	White	Not Available	Not Applicable	Total	Hispanic (Ethnicity)
Debt-to-Income Ratio	0	13	25	302	50	0	390	3
Employment History	1	1	5	43	2	0	52	0
Credit History	0	2	44	499	66	0	611	8
Collateral	0	2	12	242	48	0	304	3
Insufficient Cash	0	1	1	42	4	0	48	0
Unverifiable Information	0	2	5	45	9	0	61	0
Credit Application Incomplete	0	4	14	160	21	0	199	1
Mortgage Insurance Denied	0	0	1	1	0	0	2	0
Other	2	5	23	240	53	1	324	4
Missing	3	2	32	469	66	0	572	15
Total	6	32	162	2,043	319	1	2,563	34
% Missing	50.0%	6.3%	19.8%	23.0%	20.7%	.0%	22.3%	44.1%

Table 34.C.13
Loan Applications by Income of Applicant: Originated and Denied
 34. Remainder of Portage County
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Loan Originated	6	6	6	4	3	2	1	3	31
	Application Denied	10	12	5	6	6	7	6	3	55
	Denial Rate	62.5%	66.7%	45.5%	60.0%	66.7%	77.8%	85.7%	50.0%	64.0%
\$15,001–\$30,000	Loan Originated	182	185	186	132	88	128	80	89	1,070
	Application Denied	111	141	69	71	46	36	41	30	545
	Denial Rate	37.9%	43.3%	27.1%	35.0%	34.3%	22.0%	33.9%	25.2%	33.7%
\$30,001–\$45,000	Loan Originated	438	496	406	299	233	198	183	178	2,431
	Application Denied	131	128	116	79	64	47	39	45	649
	Denial Rate	23.0%	20.5%	22.2%	20.9%	21.5%	19.2%	17.6%	20.2%	21.1%
\$45,001–\$60,000	Loan Originated	461	480	440	331	215	221	178	142	2,468
	Application Denied	92	85	84	62	43	22	31	31	450
	Denial Rate	16.6%	15.0%	16.0%	15.8%	16.7%	9.1%	14.8%	17.9%	15.4%
\$60,001–\$75,000	Loan Originated	342	367	362	251	165	149	125	123	1,884
	Application Denied	30	61	67	52	23	15	12	17	277
	Denial Rate	8.1%	14.3%	15.6%	17.2%	12.2%	9.1%	8.8%	12.1%	12.8%
Above \$75,000	Loan Originated	555	800	777	618	371	273	338	306	4,038
	Application Denied	64	105	126	82	37	31	39	37	521
	Denial Rate	10.3%	11.6%	14.0%	11.7%	9.1%	10.2%	10.3%	10.8%	11.4%
Data Missing	Loan Originated	60	61	82	26	10	4	0	8	251
	Application Denied	19	13	12	10	2	5	2	3	66
	Denial Rate	24.1%	17.6%	12.8%	27.8%	16.7%	55.6%	100.0%	27.3%	20.8%
Total	Loan Originated	2,044	2,395	2,259	1,661	1,085	975	905	849	12,173
	Application Denied	457	545	479	362	221	163	170	166	2,563
	Denial Rate	18.3%	18.5%	17.5%	17.9%	16.9%	14.3%	15.8%	16.4%	17.4%

Table 34.C.14
Loan Applications by Income and Race/Ethnicity of Applicant: Originated and Denied
 34. Remainder of Portage 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	11	3	2	6	0	24
	Application Denied	1	1	3	0	0	0	1	6
	Denial Rate	100.0%	33.3%	21.4%	.0%	.0%	.0%	100.0%	20.0%
Asian	Loan Originated	0	9	17	20	18	65	1	130
	Application Denied	2	1	5	11	4	8	1	32
	Denial Rate	100.0%	10.0%	22.7%	35.5%	18.2%	11.0%	50.0%	19.8%
Black	Loan Originated	1	13	36	62	61	167	18	358
	Application Denied	2	13	14	30	24	78	1	162
	Denial Rate	66.7%	50.0%	28.0%	32.6%	28.2%	31.8%	5.3%	31.2%
White	Loan Originated	28	994	2,250	2,262	1,706	3,565	216	11,021
	Application Denied	44	463	538	366	218	365	49	2,043
	Denial Rate	61.1%	31.8%	19.3%	13.9%	11.3%	9.3%	18.5%	15.6%
Not Available	Loan Originated	2	51	117	121	96	230	15	632
	Application Denied	6	67	89	42	31	70	14	319
	Denial Rate	75.0%	56.8%	43.2%	25.8%	24.4%	23.3%	48.3%	33.5%
Not Applicable	Loan Originated	0	1	0	0	1	5	1	8
	Application Denied	0	0	0	1	0	0	0	1
	Denial Rate	%	.0%	%	100.0%	.0%	.0%	.0%	11.1%
Total	Loan Originated	31	1,070	2,431	2,468	1,884	4,038	251	12,173
	Application Denied	55	545	649	450	277	521	66	2,563
	Denial Rate	64.0%	33.7%	21.1%	15.4%	12.8%	11.4%	20.8%	17.4%
Non-Hispanic Ethnicity	Loan Originated	27	989	2,250	2,275	1,742	3,705	226	11,214
	Application Denied	45	444	535	382	239	446	48	2,139
	Denial Rate	62.5%	31.0%	19.2%	14.4%	12.1%	10.7%	17.5%	16.0%
Hispanic (Ethnicity)	Loan Originated	0	10	25	24	11	28	2	100
	Application Denied	2	12	7	9	1	3	0	34
	Denial Rate	100.0%	54.5%	21.9%	27.3%	8.3%	9.7%	.0%	25.4%

PREDATORY LENDING

Table 34.C.15
Originated Owner-Occupied Loans by HAL Status
 34. Remainder of Portage County
 2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Other	1,774	1,861	1,754	1,427	946	889	882	822	10,355
HAL	270	534	505	234	139	86	23	27	1,818
Total	2,044	2,395	2,259	1,661	1,085	975	905	849	12,173
Percent HAL	13.2%	22.3%	22.4%	14.1%	12.8%	8.8%	2.5%	3.2%	14.9%

Table 34.C.16
Loans by Loan Purpose by HAL Status
 34. Remainder of Portage County
 2004–2011 HMDA Data

Loan Purpose		2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	Other	1,774	1,861	1,754	1,427	946	889	882	822	10,355
	HAL	270	534	505	234	139	86	23	27	1,818
	Percent HAL	13.2%	22.3%	22.4%	14.1%	12.8%	8.8%	2.5%	3.2%	14.9%
Home Improvement	Other	289	317	327	294	175	90	82	75	1,649
	HAL	79	103	106	89	39	23	7	7	453
	Percent HAL	21.5%	24.5%	24.5%	23.2%	18.2%	20.4%	7.9%	8.5%	21.6%
Refinancing	Other	2,534	1,858	1,565	1,377	1,135	2,217	2,184	1,799	14,669
	HAL	493	740	698	344	161	128	7	21	2,592
	Percent HAL	16.3%	28.5%	30.8%	20.0%	12.4%	5.5%	.3%	1.2%	15.0%
Total	Other	4,597	4,036	3,646	3,098	2,256	3,196	3,148	2,696	26,673
	HAL	842	1,377	1,309	667	139	86	23	27	4,863
	Percent HAL	15.5%	25.4%	26.4%	17.7%	13.1%	6.9%	1.2%	2.0%	15.4%

Table 34.C.17
HALs Originated by Race of Borrower
 34. Remainder of Portage County
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	0	2	3	0	1	0	0	0	6
Asian	3	3	9	1	0	0	0	0	16
Black	13	29	45	11	2	0	0	0	100
White	235	431	415	205	134	84	22	26	1,552
Not Available	19	69	33	17	2	2	1	1	144
Not Applicable	0	0	0	0	0	0	0	0	0
Total	270	534	505	234	139	86	23	27	1,818
Hispanic (Ethnicity)	5	5	4	2	1	0	0	0	17

Table 34.C.18
Rate of HALs Originated by Race/Ethnicity of Borrower
 34. Remainder of Portage County
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	.0%	66.7%	37.5%	.0%	100.0%	.0%	.0%	.0%	25.0%
Asian	14.3%	13.0%	42.9%	5.9%	.0%	.0%	.0%	.0%	12.3%
Black	23.6%	46.0%	46.4%	21.2%	8.0%	.0%	.0%	.0%	27.9%
White	12.7%	19.9%	20.6%	13.5%	13.5%	9.3%	2.7%	3.3%	14.1%
Not Available	16.5%	50.0%	27.3%	23.9%	3.7%	6.1%	1.6%	2.6%	22.8%
Not Applicable	.0%	.0%	.0%	.0%	.0%	%	%	%	0%
Average	13.2%	22.3%	22.4%	14.1%	12.8%	8.8%	02.5%	03.2%	14.9%
Non-Hispanic Ethnicity	9.4%	21.0%	16.1%	12.1%	9.3%	2.8%	%	1.3%	%
Hispanic (Ethnicity)	21.7%	31.3%	18.2%	22.2%	12.5%	.0%	.0%	.0%	17.0%

Table 34.C.19
Loans by HAL Status by Race/Ethnicity of Borrower
 34. Remainder of Portage County
 2004–2011 HMDA Data

Race	Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Other	1	1	5	4	0	2	4	1	18
	HAL	0	2	3	0	1	0	0	0	6
	Percent HAL	.0%	66.7%	37.5%	.0%	100.0%	.0%	.0%	.0%	25.0%
Asian	Other	18	20	12	16	14	10	17	7	114
	HAL	3	3	9	1	0	0	0	0	16
	Percent HAL	14.3%	13.0%	42.9%	5.9%	.0%	.0%	.0%	.0%	12.3%
Black	Other	42	34	52	41	23	24	19	23	258
	HAL	13	29	45	11	2	0	0	0	100
	Percent HAL	23.6%	46.0%	46.4%	21.2%	8.0%	.0%	.0%	.0%	27.9%
White	Other	1,613	1,736	1,596	1,311	856	822	782	753	9,469
	HAL	235	431	415	205	134	84	22	26	1,552
	Percent HAL	12.7%	19.9%	20.6%	13.5%	13.5%	9.3%	02.7%	03.3%	14.1%
Not Available	Other	96	69	88	54	52	31	60	38	488
	HAL	19	69	33	17	2	2	1	1	144
	Percent HAL	16.5%	50.0%	27.3%	23.9%	3.7%	6.1%	1.6%	2.6%	22.8%
Not Applicable	Other	4	1	1	1	1	0	0	0	8
	HAL	0	0	0	0	0	0	0	0	0
	Percent HAL	.0%	.0%	.0%	.0%	.0%	%	%	%	0.0%
Total	Other	1,774	1,861	1,754	1,427	946	889	882	822	10,355
	HAL	270	534	505	234	139	86	23	27	1,818
	Percent HAL	13.2%	22.3%	22.4%	14.1%	12.8%	8.8%	2.5%	3.2%	14.9%
Non-Hispanic Ethnicity	Other	1,483	1,769	1,648	1,365	877	848	813	775	9,578
	HAL	227	460	468	215	135	83	22	26	1,636
	Percent HAL	13.3%	20.6%	22.1%	13.6%	13.3%	8.9%	2.6%	3.2%	14.6%
Hispanic (Ethnicity)	Other	18	11	18	7	7	6	9	7	83
	HAL	5	5	4	2	1	0	0	0	17
	Percent HAL	21.7%	31.3%	18.2%	22.2%	12.5%	.0%	.0%	.0%	17.0%

Table 34.C.20
Rates of HALs by Income of Borrower
 34. Remainder of Portage County
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Average
\$15,000 or Below	33.3%	16.7%	33.3%	.0%	.0%	.0%	.0%	.0%	16.1%
\$15,001–\$30,000	18.1%	27.0%	27.4%	25.8%	35.2%	18.8%	1.3%	7.9%	21.6%
\$30,001–\$45,000	19.4%	33.5%	23.6%	17.4%	15.0%	10.6%	4.4%	4.5%	19.4%
\$45,001–\$60,000	14.3%	25.4%	25.5%	16.0%	12.6%	6.8%	5.6%	2.1%	16.5%
\$60,001–\$75,000	11.7%	21.3%	22.4%	13.1%	12.1%	7.4%	.8%	1.6%	14.1%
Above \$75,000	7.6%	12.9%	16.3%	8.6%	6.7%	5.5%	0.9%	2.3%	9.3%
Data Missing	3.3%	23.0%	43.9%	34.6%	10.0%	.0%	%	.0%	24.7%
Average	13.2%	22.3%	22.4%	14.1%	12.8%	8.8%	2.5%	3.2%	14.9%

Table 34.C.21
Loans by HAL Status by Income of Borrower
 34. Remainder of Portage County
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Other	4	5	4	4	3	2	1	3	26
	HAL	2	1	2	0	0	0	0	0	5
	Percent HAL	33.3%	16.7%	33.3%	.0%	.0%	.0%	.0%	.0%	16.1%
\$15,001–\$30,000	Other	149	135	135	98	57	104	79	82	839
	HAL	33	50	51	34	31	24	1	7	231
	Percent HAL	18.1%	27.0%	27.4%	25.8%	35.2%	18.8%	1.3%	7.9%	21.6%
\$30,001–\$45,000	Other	353	330	310	247	198	177	175	170	1,960
	HAL	85	166	96	52	35	21	8	8	471
	Percent HAL	19.4%	33.5%	23.6%	17.4%	15.0%	10.6%	4.4%	4.5%	19.4%
\$45,001 – \$60,000	Other	395	358	328	278	188	206	168	139	2,060
	HAL	66	122	112	53	27	15	10	3	408
	Percent HAL	14.3%	25.4%	25.5%	16.0%	12.6%	6.8%	5.6%	2.1%	16.5%
\$60,001–\$75,000	Other	302	289	281	218	145	138	124	121	1,618
	HAL	40	78	81	33	20	11	1	2	266
	Percent HAL	11.7%	21.3%	22.4%	13.1%	12.1%	7.4%	.8%	1.6%	14.1%
Above \$75,000	Other	513	697	650	565	346	258	335	299	3,663
	HAL	42	103	127	53	25	15	3	7	375
	Percent HAL	7.6%	12.9%	16.3%	8.6%	6.7%	5.5%	.9%	2.3%	9.3%
Data Missing	Other	58	47	46	17	9	4	0	8	189
	HAL	2	14	36	9	1	0	0	0	62
	Percent HAL	3.3%	23.0%	43.9%	34.6%	10.0%	.0%	%	.0%	24.7%
Total	Other	1,774	1,861	1,754	1,427	946	889	882	822	10,355
	HAL	270	534	505	234	139	86	23	27	1,818
	Percent HAL	13.2%	22.3%	22.4%	14.1%	12.8%	8.8%	2.5%	3.2%	14.9%

D. CRA DATA

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

Table 34.D.1
Small Business Loans Originated: \$100,000 or Less by Tract MFI
 34. Remainder of Portage 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		42	1,314	311		1,667
2001		43	1,416	316		1,775
2002		64	1,827	433		2,324
2003		108	1,703	422		2,233
2004		111	1,795	466		2,372
2005		118	2,006	490		2,614
2006		129	2,730	796		3,655
2007		136	2,887	838		3,861
2008		122	2,335	671		3,128
2009		52	995	325		1,372
2010		37	894	272		1,203
2011		54	1,085	273		1,412
Total	0	1,016	20,987	5,613	0	27,616
Loan Amount (\$1,000s)						
2000		550	14,646	3,827		19,023
2001		689	14,496	3,796		18,981
2002		751	19,428	4,066		24,245
2003		953	15,623	3,955		20,531
2004		1,081	16,306	4,595		21,982
2005		1,104	20,771	5,245		27,120
2006		1,406	26,027	8,057		35,490
2007		1,469	26,223	7,872		35,564
2008		1,168	22,039	6,451		29,658
2009		779	12,738	3,792		17,309
2010		485	12,359	3,225		16,069
2011		514	13,089	3,848		17,451
Total	0	10,949	213,745	58,729	0	283,423

Table 34.D.2
Small Business Loans Originated: \$100,001 to \$250,000 by Tract MFI
 34. Remainder of Portage 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		2	44	10		56
2001		1	65	18		84
2002		1	66	15		82
2003		3	69	21		93
2004		2	71	21		94
2005		3	44	10		57
2006		0	81	15		96
2007		1	41	2		44
2008		1	43	5		49
2009		0	34	4		38
2010		4	37	9		50
2011		1	42	8		51
Total	0	19	637	138	0	794
Loan Amount (\$1,000s)						
2000		500	7,191	1,718		9,409
2001		250	11,703	3,650		15,603
2002		250	11,008	2,792		14,050
2003		588	11,947	3,921		16,456
2004		500	12,420	4,126		17,046
2005		663	7,961	1,888		10,512
2006		0	14,272	2,813		17,085
2007		122	7,462	400		7,984
2008		188	7,764	896		8,848
2009		0	5,451	811		6,262
2010		609	6,607	1,459		8,675
2011		185	7,434	1,354		8,973
Total	0	3,855	111,220	25,828	0	140,903

Table 34.D.3
Small Business Loans Originated: More than \$250,000 by Tract MFI
 34. Remainder of Portage 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	47	15		62
2001		1	40	10		51
2002		3	55	14		72
2003		5	57	17		79
2004		2	51	22		75
2005		2	48	15		65
2006		2	49	16		67
2007		0	64	10		74
2008		1	40	13		54
2009		1	41	12		54
2010		3	49	19		71
2011		1	44	12		57
Total	0	21	585	175	0	781
Loan Amount (\$1,000s)						
2000		0	23,041	8,965		32,006
2001		290	20,959	5,899		27,148
2002		1,650	29,706	9,050		40,406
2003		2,155	32,986	10,410		45,551
2004		1,000	31,192	12,896		45,088
2005		900	28,006	8,544		37,450
2006		1,265	27,441	6,443		35,149
2007		0	33,532	5,053		38,585
2008		471	23,948	6,618		31,037
2009		750	21,563	6,918		29,231
2010		1,217	26,485	9,570		37,272
2011		1,000	22,964	6,512		30,476
Total	0	10,698	321,823	96,878	0	429,399

Table 34.D.4
Small Business Loans to Businesses with Gross Annual Revenues of Less Than \$1 Million by Tract MFI
 34. Remainder of Portage 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		16	538	114		668
2001		19	547	127		693
2002		17	509	110		636
2003		41	525	152		718
2004		46	598	168		812
2005		54	877	200		1,131
2006		44	1,032	227		1,303
2007		49	1,079	273		1,401
2008		36	680	171		887
2009		13	344	85		442
2010		17	289	84		390
2011		25	437	131		593
Total	0	377	7,455	1,842	0	9,674
Loan Amount (\$1,000s)						
2000		609	22,976	6,544		30,129
2001		285	20,182	5,439		25,906
2002		881	26,509	5,549		32,939
2003		2,488	23,333	5,432		31,253
2004		549	20,200	7,914		28,663
2005		1,497	18,958	4,945		25,400
2006		611	21,621	6,156		28,388
2007		1,064	23,112	4,249		28,425
2008		612	17,652	2,802		21,066
2009		367	10,088	2,660		13,115
2010		552	13,306	4,165		18,023
2011		557	12,878	5,208		18,643
Total	0	10,072	230,815	61,063	0	301,950

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 34.E.1
Fair Housing Complaints by Basis
 34. Remainder of Portage County
 2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability	2	3	3	3	3	0	2	3	6	25
Family Status	1	2	1	1	3	3	0	1		12
Race	1	2	5	1	3	2	0	1		15
Sex	0		0	0	0		0	1		1
Total Bases	4	7	9	5	9	5	2	6	6	53
Total Complaints	3	6	9	4	7	5	2	6	6	48

Table 34.E.2
Fair Housing Complaints by Issue
 34. Remainder of Portage County
 2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Non-compliance with design and construction requirements (handicap)			2		1				6	9
Other discriminatory acts		2	3	0	2					7
Failure to make reasonable accommodation	1	0	1		0	0	2	3		7
Otherwise deny or make housing available									6	6
Discriminatory refusal to rent	1	2		0	1	0	0	1		5
Discriminatory refusal to rent and negotiate for rental		0		0		2	0			2
Discriminatory advertising, statements, and notices					0	2	0			2
Discriminatory advertisement - rental				0	1	1		0		2
Discrimination in services and facilities relating to rental			1	1				0		2
Restriction of choices relative to a rental						2				2
Discriminatory acts under Section 818 (coercion, etc.)				2						2
Discriminatory terms, conditions, privileges, or services and facilities		0	0	2	2	1	0	1	6	12
Discrimination in terms, conditions or privileges relating to rental	1	1	4	0	1	3	1	1		12
Discriminatory refusal to sell and negotiate for sale			1							1
Discrimination in terms, conditions, privileges relating to sale			1		0					1
Refusing to provide municipal services or property								1		1
Total Issues	5	6	10	5	8	11	3	7	18	73
Total Complaints	3	6	9	4	7	5	2	6	6	48

Table 34.E.3
Fair Housing Complaints by Closure Status
 34. Remainder of Portage County
 2004–2012 HUD Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Administrative Closure			1	0	1			1		3
Cause (FHAP)		1	2	0	1	1	1	1		7
Charged (HUD)						2				2
Conciliated / Settled	3	3	1	1	3	0	0	1		12
No Cause	0	2	5	3	2	2	1	3		18
Open							0		6	6
Total Complaints	3	6	9	4	7	5	2	6	6	48

HUD Complaints Found With Cause

Table 34.E.4
Fair Housing Complaints Found With Cause by Basis
 34. Remainder of Portage County
 2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability	2	2	2	1	3	0	1			11
Family Status	1	1	1	0	3	3	0	1		10
Race	1	2					0	0		3
Sex				0			0	1		1
Total Bases	4	5	3	1	6	3	1	2		25
Total Complaints	3	4	3	1	4	3	1	2		21

Table 34.E.5
Fair Housing Complaints Found With Cause by Issue
 34. Remainder of Portage County
 2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Other discriminatory acts		2	3			2				7
Discrimination in terms, conditions or privileges relating to rental	1			1		1	2	1		6
Discriminatory refusal to rent	1	1			0		0	0	1	3
Non-compliance with design and construction requirements (handicap)				2		1				3
Discriminatory refusal to rent and negotiate for rental			0				2	0		2
Discriminatory advertising, statements, and notices					0	2	0			2
Discriminatory advertisement - rental					0	1	1		0	2
Discrimination in services and facilities relating to rental				1	1				0	2
Restriction of choices relative to a rental							2			2
Failure to make reasonable accommodation	1	0	0		0	0	1			2
Discriminatory terms, conditions, privileges, or services and facilities		0	0	0		0		1		1
Total Issues	5	4	4	1	5	9	2	2	0	32
Total Complaints	3	4	3	1	4	3	1	2		21

OHIO CIVIL RIGHTS COMMISSION COMPLAINTS

Table 34.E.6
Fair Housing Complaints by Basis
 34. Remainder of Portage County
 2004–2012 OCRRC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color		1	1				0	1		3
Disability	2	3	3	5	1	2	1	4	1	22
Family Status		3	1	3	4	2	1	1		15
Gender	1		1	3	0	1	1		1	8
National Origin			0			1				1
Race	1	8	7	2	1	0	0	2		23
Retaliation	0	3	1	2	1	0	1	0	1	9
Other	1			1						2
Total Bases	5	18	14	16	8	7	4	8	3	83
Total Complaints	4	12	12	11	7	4	3	7	2	62

Table 34.E.7
Fair Housing Complaints by Issue
 34. Remainder of Portage County
 2004–2012 OCRRC Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Constructive Discharge			1							1
Exclusion					1					1
Harassment			0	1		1				2
Intimidation		1	1	2	2		1	4		11
Other	4	5	5	3	2	0	0	2	2	23
Reasonable Accommodation		1	0	0			1	1		3
Terms and Conditions	1	6	8	7	4	3	3	6		38
Total Issues	5	13	15	13	9	4	5	13	2	79
Total Complaints	4	12	12	11	7	4	3	7	2	62

Table 34.E.8
Fair Housing Complaints by Closure Status
 34. Remainder of Portage County
 2004–2012 OCRRC Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Administrative Closure			1				0	1		2
CP Withdrawal – No Benefit			0	1		0				1
No Cause Finding Issued	1	6	7	9	3	2	1	4		33
No Jurisdiction							1	1	1	3
Settlement With Benefits	1	3	3	1	2	2	1			13
Successful Conciliation		1						1		2
Withdrawal With Benefits	2	2	1	0	2			0	1	8
Total Complaints	4	12	12	11	7	4	3	7	2	62

FAIR HOUSING CONTACT SERVICE COMPLAINTS

Table 34.E.9
Fair Housing Complaints by Basis
 34. Remainder of Portage County
 2004–2012 FHCS Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Advertising	1									1
Criminal Background					0	1				1
Disability	3		4	8	11	7	8	7	6	54
Familial Status	2	1	5	5	2	0	2	3		20
Harassment				1	1					2
National Origin			0		1	1	1		0	3
Race	0	1	4	3	2	1	3	0		14
Retaliation			2	1	1	0	2		1	7
Sex			3	1	2	0	3			9
Other				1	1	2	0		0	4
Unknown					1					1
Total Bases	6	2	18	20	22	12	19	10	7	116
Total Complaints	4	2	15	13	17	10	15	11	7	94

Table 34.E.10
Fair Housing Complaints by Closure Status
 34. Remainder of Portage County
 2004–2012 FHCS Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Closed			5	4	6	4	1	0		20
Dismissed							1			1
Elected not to pursue						1			1	2
Independently resolved						1	2	3	2	8
Inquiry			5	3	8			1	1	18
No contact							5	2	0	7
No probable cause			1	3	1	1	1	2		9
Pending			1	3						4
Probable cause			0	0		0	0	2		2
Reasonable accommodation granted							0	1	2	3
Referred for other assistance							2		1	3
Settled			3	0	0	3	3			9
Settled through OCRC					2					2
Missing	4	2								6
Total Complaints	4	2	15	13	17	10	15	11	7	94

THE HOUSING RESEARCH AND ADVOCACY CENTER COMPLAINTS

Table 34.E.11
Fair Housing Complaints by Basis

34 Remainder of Portage County
2004–2012 HRAC 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			0			1

Table 34.E.12
Fair Housing Complaints by Issue

34 Remainder of Portage County
2004–2012 HRAC Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Rental				1			0			1
Total	0	0	0	1	0	0	0	0	0	1
Total Complaints				1			0			1

Table 34.E.13
Fair Housing Complaints by Action Taken

34 Remainder of Portage County
2004–2012 HRAC Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Referred to OCRC				1			0			1
Total	0	0	0	1	0	0	0	0	0	1
Total Complaints				1			0			1

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 34.F.1
Primary Role of Respondent
34. Remainder of Portage County
2012–2013 Fair Housing Survey for Housing
Stakeholders Data

Primary Role	Total
Advocate/Service Provider	1
Construction/Development	2
Total	3

FEDERAL, STATE, AND LOCAL LAWS

Table 34.F.2
Familiarity with Fair Housing Laws

34. Remainder of Portage County
2012–2013 Fair Housing Survey
for Housing Stakeholders Data

Familiarity	Total
Not Familiar	0
Somewhat Familiar	1
Very Familiar	2
Missing	0
Total	3

Table 34.F.3
Perceptions About Fair Housing Laws

34. Remainder of Portage 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?	2	1	0	0	3
Are fair housing laws difficult to understand or follow?	2	1	0	0	3
Do you think fair housing laws should be changed?	1	1	1	0	3
Do you think fair housing laws are adequately enforced?	2	0	1	0	3

Table 34.F.4
Fair Housing Activities

34. Remainder of Portage County
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?		2	0	1	0	3
Have you participated in fair housing training?		1	1		1	3
Are you aware of any fair housing testing?		1	2	0	0	3
Testing and education	Too Little	Right Amount	Too Much	Don't Know	Missing	Total
Is there sufficient outreach and education activity?	1	0	1	1	0	3
Is there sufficient testing?	0	0		3	0	3

Table 34.F.5
Protected Classes

34. Remainder of Portage County
2012–2013 Fair Housing Survey
for Housing Stakeholders Data

Protected Class	Total
Religion	1
Sexual Orientation	1
Total	2

Table 34.F.6
Fair Housing Violation Referrals
 34. Remainder of Portage County
 2012–2013 Fair Housing Survey for
 Housing Stakeholders Data

Referral	Total
ACLU	1
Fair Housing Contact Service	1
HUD	1
Other	2
Total	5

LOCAL FAIR HOUSING

Table 34.F.7
Local Fair Housing
 34. Remainder of Portage 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?	0	3	0	0	3
Are there any specific geographic areas that have fair housing problems?	0	2	1	0	3
Are there any specific groups in that face housing discrimination?	1	1	1	0	3

FAIR HOUSING IN THE PRIVATE SECTOR

Table 34.F.8
Barriers to Fair Housing in the Private Sector
 34. Remainder of Portage 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	1	0	3
The real estate industry?	1	1	1	0	3
The mortgage and home lending industry?	0	2	1	0	3
The housing construction or accessible housing design fields?	0	2	1	0	3
The home insurance industry?	0	2	1	0	3
The home appraisal industry?	0	2	1	0	3
Any other housing services?	0	2	1	0	3

FAIR HOUSING IN THE PUBLIC SECTOR

Table 34.F.9

Barriers to Fair Housing in the Public Sector

34. Remainder of Portage 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	1	0	3
Zoning laws?	0	1	2	0	3
Occupancy standards or health and safety codes?	0	1	2	0	3
Property tax policies?	0	2	1	0	3
Permitting process?	0	1	2	0	3
Housing construction standards?	0	1	2	0	3
Neighborhood or community development policies?	0	2	1	0	3
Limited access to government services, such as employment services?	0	2	1	0	3
Public administrative actions or regulations?	0	1	2	0	3

NARRATIVE COMMENTS

Federal, State, and Local Laws

Table 34.F.10

How did you become aware of fair housing laws?

34. Remainder of Portage County
2013 Fair Housing Survey Data

Comments:
Attending meetings with Fair Housing staff. Training from Portage County Regional Planning Property Management Training Read information supplied by local housing authority.

Table 34.F.11

How should fair housing laws be changed?

34. Remainder of Portage County
2013 Fair Housing Survey Data

Comments:
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.

Local Fair Housing

Table 34.F.12

Are there any specific groups in that face housing discrimination?

34. Remainder of Portage County
2013 Fair Housing Survey Data

Comments:
mentally ill

Table 34.F.13
Please share any additional comments.

34. Remainder of Portage County
 2013 Fair Housing Survey Data

Comments:
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.

Fair Housing in the Public Sector

Table 34.F.14
Are you aware of any questionable practices or barriers to fair housing choice in the permitting process?

34. Remainder of Portage County
 2013 Fair Housing Survey Data

Comments:
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.

Table 34.F.15
Are you aware of any questionable practices or barriers to fair housing choice in housing construction standards?

34. Remainder of Portage County
 2013 Fair Housing Survey Data

Comments:
What is your definition of accessible housing?

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 Portage County that received and completed the survey.⁴⁰

⁴⁰ 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 34.G.1
Housing Development
 34. Remainder of Portage 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	0	0	1	4
Guidelines that encourage development affordable housing units?	0	2	1	1	4
Any potential barriers to the development of low- to moderate- income housing?	0	3	0	1	4
Guidelines that allow the development of mixed use housing?	1	2	0	1	4
Any potential barriers to the development of mixed use housing?	0	3	0	1	4
Occupancy Standards					
A definition for the term "family"?	3	0	0	1	4
Residential occupancy standards or limits?	2	0	1	1	4
Special Needs Housing					
A definition for the term "disability"?	1	1	1	1	4
Development standards for making housing accessible to persons with disabilities?	0	3	0	1	4
A process by which persons with disabilities can request modification to the jurisdiction's policies?	1	2	0	1	4
Standards for the development of senior housing?	0	3	0	1	4
Guidelines that distinguish senior citizen housing from other residential uses?	0	3	0	1	4
Guidelines for developing housing for any other special needs populations?	0	3	0	1	4
Fair Housing Policies					
A fair housing ordinance, policy, or regulation?	1	2	0	1	4
Policies or practices for "affirmatively furthering fair housing"?	1	2	0	1	4

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 Portage 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 Portage 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 in the remainder of Portage County.

Results of the Fair Housing Surveys indicate that a few communities in the remainder of Portage County lack or do not have sufficient policies or practices that adequately address the duty to affirmatively further fair housing.

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 Portage 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 in the remainder of Portage County. 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 34.H.1
Impediments Matrix
 34. Remainder of Portage 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 ⁴¹			
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				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	Lack of inclusionary policies							X		X		All	M

⁴¹ 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.

35. STARK COUNTY

A. CENSUS BUREAU DATA

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

Table 35.A.1

Population by Age

35. Stark County

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 35.A.2

Elderly Population by Age

35. Stark County

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 35.A.3

Population by Race and Ethnicity

35. Stark County

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 35.A.4
Disability by Age
 35. Stark County
 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 35.A.5
Employment Status by Disability and Type: Age 18 to 64
 35. Stark County
 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 35.A.6
Households by Income

35. Stark 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	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 35.A.7
Poverty by Age

35. Stark 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	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 35.A.8
Households by Year Home Built

35. Stark 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	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 35.A.9**Housing Units by Type**

35. Stark 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	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 35.A.10**Housing Units by Tenure**

35. Stark County

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 35.A.11**Disposition of Vacant Housing Units**

35. Stark County

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 35.A.12**Households by Household Size**

35. Stark County

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 35.A.13
Household Type by Tenure
 35. Stark County
 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 35.A.14
Group Quarters Population
 35. Stark 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	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 35.A.15
Overcrowding and Severe Overcrowding
 35. Stark 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	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 35.A.16
Households with Incomplete Plumbing Facilities
 35. Stark County
 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 35.A.17
Households with Incomplete Kitchen Facilities
 35. Stark County
 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 35.A.18
Cost Burden and Severe Cost Burden by Tenure
 35. Stark 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	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 35.A.19
Median Housing Costs
 35. Stark County
 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 35.B.1
Employment by Industry
 35. Stark County
 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) ⁴²	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%

⁴² (D): These data are not shown to avoid disclosure of confidential information, but estimates are included in the totals.

Table 35.B.2
Real Earnings by Industry

35. Stark County
 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) ⁴³	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%

⁴³ (D): These data are not shown to avoid disclosure of confidential information, but estimates are included in the totals.

Table 35.B.3
Real Earnings Per Job by Industry
 35. Stark 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	13,254	9,280	5,818	8,416	13,338	13,560	11,654	-12.1%
Forestry, fishing, related activities, and other	(D) ⁴⁴	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	42,637	42,475	42,247	41,470	41,980	40,253	40,566	-4.86%

⁴⁴ (D): These data are not shown to avoid disclosure of confidential information, but estimates are included in the totals.

Table 35.B.4
Total Employment and Real Personal Income
 35. Stark 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	5,820,618	403,023	34,539	848,185	497,339	6,797,659	18,373	160,468	36,275
1970	5,734,666	393,890	34,714	869,584	555,426	6,800,500	18,245	160,488	35,734
1971	5,501,500	388,543	79,784	882,170	626,103	6,701,013	17,882	155,354	35,414
1972	5,918,982	439,606	95,266	896,486	665,711	7,136,840	19,179	158,651	37,308
1973	6,420,916	552,514	98,043	933,556	732,846	7,632,846	20,008	167,857	38,252
1974	6,548,805	582,008	99,044	978,765	795,034	7,839,639	20,504	173,250	37,798
1975	6,206,136	536,604	105,920	965,089	944,776	7,685,316	20,323	167,417	37,072
1976	6,448,910	564,670	112,595	983,128	971,843	7,951,805	21,157	167,645	38,468
1977	6,729,367	588,719	179,191	1,039,304	951,605	8,310,748	22,094	170,935	39,367
1978	7,067,270	641,704	205,855	1,103,035	948,509	8,682,965	22,947	177,987	39,706
1979	7,302,632	690,030	225,291	1,180,512	1,005,460	9,023,865	23,918	182,663	39,978
1980	6,941,305	654,242	245,670	1,346,475	1,168,450	9,047,658	23,886	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	23,674	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	37,346
1984	6,530,143	698,073	272,052	1,786,052	1,355,200	9,245,373	24,781	172,224	37,916
1985	6,573,332	716,528	285,854	1,813,077	1,393,547	9,349,282	25,243	175,330	37,491
1986	6,472,004	728,447	329,080	1,833,351	1,465,098	9,371,086	25,510	176,798	36,606
1987	6,683,925	753,359	310,593	1,796,707	1,486,063	9,523,929	26,037	182,656	36,594
1988	6,987,358	809,466	307,146	1,841,486	1,504,443	9,830,968	26,755	186,249	37,517
1989	7,020,350	820,596	328,763	2,022,688	1,543,500	10,094,704	27,426	189,396	37,066
1990	7,103,996	846,094	315,173	2,011,219	1,668,695	10,252,988	27,856	192,441	36,916
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	28,126	190,459	38,159
1993	7,464,416	913,292	371,106	1,928,934	1,841,465	10,692,628	28,531	192,961	38,684
1994	7,764,851	961,068	390,450	2,049,459	1,814,776	11,058,468	29,405	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	39,332
1996	8,009,893	987,779	428,027	2,168,141	1,915,170	11,533,452	30,529	205,201	39,035
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	41,033
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	35,028	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	42,637
2002	9,119,918	987,996	461,766	2,081,877	2,292,972	12,968,536	34,412	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	34,867	211,268	41,470
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	34,096	199,500	40,566

C. BLS DATA

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

Table 35.C.1
Labor Force Statistics
 35. Stark County
 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.⁴⁵ The information presented in this section presents detailed HMDA data, including denial rates and predatory lending including high annual percentage rate (APR) loans.

Table 35.D.1
Purpose of Loan by Year
35. Stark County
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 35.D.2
Occupancy Status for Home Purchase Loan Applications
35. Stark County
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 35.D.3
Owner-Occupied Home Purchase Loan Applications by Loan Type
35. Stark County
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

⁴⁵ 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 35.D.4
Loan Applications by Action Taken
 35. Stark County
 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 35.D.5
Denial Rates by Gender of Applicant
 35. Stark County
 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 35.D.6
Loan Applications by Selected Action Taken by Gender of Applicant
 35. Stark County
 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 35.D.7
Denial Rates by Race/Ethnicity of Applicant
 35. Stark County
 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 35.D.8
Loan Applications by Selected Action Taken by Race/Ethnicity of Applicant
 35. Stark County
 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 35.D.9
Loan Applications by Reason for Denial
 35. Stark County
 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 35.D.10
Denial Rates by Income of Applicant
 35. Stark County
 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 35.D.11
Denial Rates of Loans by Race/Ethnicity and Income of Applicant
 35. Stark County
 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 35.D.12
Loan Applications by Reason for Denial by Race/Ethnicity of Applicant
 35. Stark County
 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 35.D.13
Loan Applications by Income of Applicant: Originated and Denied
 35. Stark County
 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 35.D.14
Loan Applications by Income and Race/Ethnicity of Applicant: Originated and Denied
 35. Stark County
 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 35.D.15
Originated Owner-Occupied Loans by HAL Status
 35. Stark County
 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 35.D.16
Loans by Loan Purpose by HAL Status
 35. Stark County
 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 35.D.17
HALs Originated by Race of Borrower
 35. Stark County
 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 35.D.18
Rate of HALs Originated by Race/Ethnicity of Borrower
 35. Stark County
 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 35.D.19
Loans by HAL Status by Race/Ethnicity of Borrower
 35. Stark County
 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 35.D.20
Rates of HALs by Income of Borrower
 35. Stark County
 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 35.D.21
Loans by HAL Status by Income of Borrower
 35. Stark County
 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 35.E.1
Small Business Loans Originated: \$100,000 or Less by Tract MFI
 35. Stark 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	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 35.E.2
Small Business Loans Originated: \$100,001 to \$250,000 by Tract MFI
 35. Stark 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	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 35.E.3
Small Business Loans Originated: More than \$250,000 by Tract MFI
 35. Stark 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	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 35.E.4
Small Business Loans to Businesses with Gross Annual Revenues of Less Than
\$1 Million by Tract MFI
 35. Stark 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	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 35.F.1
Fair Housing Complaints by Basis
 35. Stark County
 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 35.F.2
Fair Housing Complaints by Issue
 35. Stark County
 2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
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
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
False denial or representation of availability - rental				1		2		1		4
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
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
Discriminatory acts under Section 818 (coercion, etc.)		1	2		1	6	9	2	2	23
Discrimination in making of loans	1							1		2
Adverse action against an employee						2				2
Non-compliance with design and construction requirements (handicap)			9					3	2	14
Discriminatory advertisement - rental						5		3	3	11
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 35.F.3
Fair Housing Complaints by Closure Status
 35. Stark County
 2004–2012 HUD Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Administrative Closure	2	1	1	2	5	5	4	1	2	23
Cause (FHAP)	1	1	12	2		11	9	4		40
Conciliated / Settled	5	5	7	8	2	7	23	7	6	70
No Cause	6	6	11	8	8	10	14	3		66
Open							1	4	15	20
Total Complaints	14	13	31	20	15	33	51	19	23	219

HUD Complaints Found With Cause

Table 35.F.4
Fair Housing Complaints Found With Cause by Basis
 35. Stark County
 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 35.F.5
Fair Housing Complaints Found With Cause by Issue
 35. Stark County
 2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
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
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
Adverse action against an employee						2				2
Failure to permit reasonable modification			1					1		2
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
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 35.F.6
Fair Housing Complaints by Basis
 35. Stark County
 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 35.F.7
Fair Housing Complaints by Issue
 35. Stark County
 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 35.F.8
Fair Housing Complaints by Closure Status
 35. Stark County
 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 35.F.9
Fair Housing Complaints by Basis
 35. Stark County
 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 35.F.10
Fair Housing Complaints by Closure Status
 35. Stark County
 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 35.G.1

Primary Role of Respondent

35. Stark County
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 35.G.2

**Familiarity with Fair
Housing Laws**

35. Stark County
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 35.G.3

Perceptions About Fair Housing Laws

35. Stark 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			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 35.G.4
Fair Housing Activities

35. Stark County
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 35.G.5

Protected Classes

35. Stark County
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 35.G.6

Fair Housing Violation Referrals

35. Stark County
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 35.G.7

Local Fair Housing

35. Stark 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	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 35.G.8

Barriers to Fair Housing in the Private Sector

35. Stark 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?	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 35.G.9

Barriers to Fair Housing in the Public Sector

35. Stark 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	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 35.G.10

How did you become aware of fair housing laws?

35. Stark County

2013 Fair Housing Survey Data

Comments:
I have taken trainings and read in this area.

Table 35.G.11

How should fair housing laws be changed?

35. Stark County

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 35.G.12

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

35. Stark County
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 35.G.13

Are there any specific groups in that face housing discrimination?

35. Stark County
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 35.G.14

Please share any additional comments.

35. Stark County
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 35.G.15

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

35. Stark County
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 35.G.16

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

35. Stark County
2013 Fair Housing Survey Data

Comments:
I know some minorities who do not feel welcomed to live in certain parts of the county.

Table 35.G.17

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

35. Stark County
2013 Fair Housing Survey Data

Comments:
More minorities are denied loans for mortgages.

Table 35.G.18

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

35. Stark County
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 35.G.19

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

35. Stark County
2013 Fair Housing Survey Data

Comments:
Problems with group homes in residential communities.

Table 35.G.20

Are you aware of any barriers that limit access to government services, such as a lack of transportation or employment services?

35. Stark County
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 Stark County that received and completed the survey.⁴⁶

⁴⁶ 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 35.H.1
Housing Development
 35. Stark 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"?	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?		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 Stark 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 Stark 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 in Stark County.

Results of the Fair Housing Surveys indicate that a number of local communities lack in the County or do not have sufficient policies or practices that adequately address the duty to affirmatively further fair housing.

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 Stark 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:* Policies and practices used decades ago have resulted in segregation of minority populations

Fair housing choice in the County 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 in the County. 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 35.I.1
Impediments Matrix
 35. Stark 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 ⁴⁷		
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			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	Lack of inclusionary policies							X		X	All	M

⁴⁷ 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.

36. CITY OF ALLIANCE

A. CENSUS BUREAU DATA

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

Table 36.A.1

Population by Age

36. City of Alliance

2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Under 5	1,563	6.7%	1,445	6.5%	-7.5%
5 to 19	5,141	22.1%	4,655	20.9%	-9.5%
20 to 24	2,345	10.1%	2,380	10.7%	1.5%
25 to 34	2,839	12.2%	2,599	11.6%	-8.5%
35 to 54	5,729	24.6%	5,139	23.0%	-10.3%
55 to 64	1,864	8.0%	2,605	11.7%	39.8%
65 or Older	3,772	16.2%	3,499	15.7%	-7.2%
Total	23,253	100.0%	22,322	100.0%	-4.0%

Table 36.A.2

Elderly Population by Age

36. City of Alliance

2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
65 to 66	335	8.9%	371	10.6%	10.7%
67 to 69	486	12.9%	511	14.6%	5.1%
70 to 74	921	24.4%	699	20.0%	-24.1%
75 to 79	904	24.0%	595	17.0%	-34.2%
80 to 84	626	16.6%	628	17.9%	.3%
85 or Older	500	13.3%	695	19.9%	39.0%
Total	3,772	100.0%	3,499	100.0%	-7.2%

Table 36.A.3

Population by Race and Ethnicity

36. City of Alliance

2000 & 2010 Census SF1 Data

Race	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
White	19,884	85.5%	18,895	84.6%	-5.0%
Black	2,602	11.2%	2,333	10.5%	-10.3%
American Indian	39	.2%	38	.2%	-2.6%
Asian	180	.8%	168	.8%	-6.7%
Native Hawaiian/ Pacific Islander	4	.0%	4	.0%	.0%
Other	96	.4%	116	.5%	20.8%
Two or More Races	448	1.9%	768	3.4%	71.4%
Total	23,253	100.0%	22,322	100.0%	-4.0%
Non-Hispanic	22,982	98.8	21,904	98.1%	-4.7%
Hispanic	271	1.2%	418	1.9%	54.2%

Table 36.A.4
Disability by Age
 36. City of Alliance
 2010 Three-Year ACS Data

Age	Male		Female		Total	
	Disabled Population	Disability Rate	Disabled Population	Disability Rate	Disabled Population	Disability Rate
Under 5	18	2.9%	0	.0%	18	1.4%
5 to 17	130	7.4%	90	5.5%	220	6.5%
18 to 34	134	4.7%	172	5.8%	306	5.3%
35 to 64	651	15.9%	807	18.6%	1,458	17.3%
65 to 74	123	20.4%	247	26.1%	370	23.9%
75 or Older	298	40.7%	449	43.5%	747	42.3%
Total	1,354	12.7%	1,765	15.2%	3,119	14.0%

Table 36.A.5
Employment Status by Disability and Type: Age 18 to 64
 36. City of Alliance
 2010 Three-Year ACS Data

Disability Status	Population
Employed:	8,814
With a disability:	346
With a hearing difficulty	208
With a vision difficulty	145
With a cognitive difficulty	22
With an ambulatory difficulty	75
With a self-care difficulty	22
With an independent living difficulty	53
No disability	8,468
Unemployed:	1,535
With a disability:	205
With a hearing difficulty	0
With a vision difficulty	0
With a cognitive difficulty	150
With an ambulatory difficulty	105
With a self-care difficulty	50
With an independent living difficulty	69
No disability	1,330
Not in labor force:	3,867
With a disability:	1,213
With a hearing difficulty	118
With a vision difficulty	230
With a cognitive difficulty	548
With an ambulatory difficulty	665
With a self-care difficulty	110
With an independent living difficulty	315
No disability	2,654
Total	14,216

Table 36.A.6
Households by Income

36. City of Alliance
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	2,096	23.5%	1,839	20.4%
\$15,000 to \$19,999	894	10.0%	912	10.1%
\$20,000 to \$24,999	723	8.1%	814	9.0%
\$25,000 to \$34,999	1,393	15.6%	1,333	14.8%
\$35,000 to \$49,999	1,716	19.2%	1,527	16.9%
\$50,000 to \$74,999	1,258	14.1%	1,535	17.0%
\$75,000 to \$99,999	536	6.0%	590	6.5%
\$100,000 or More	316	3.5%	461	5.1%
Total	8,932	100.0%	9,011	100.0%

Table 36.A.7
Poverty by Age

36. City of Alliance
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	622	16.2%	536	13.5%
6 to 17	844	22.0%	806	20.3%
18 to 64	1,988	51.8%	2,332	58.7%
65 or Older	381	9.9%	298	7.5%
Total	3,835	100.0%	3,972	100.0%
Poverty Rate	18.0%	.	19.2%	.

Table 36.A.8
Households by Year Home Built

36. City of Alliance
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	3,371	38.1%	3,561	39.5%
1940 to 1949	1,347	15.2%	980	10.9%
1950 to 1959	1,492	16.9%	1,406	15.6%
1960 to 1969	769	8.7%	711	7.9%
1970 to 1979	941	10.6%	1,030	11.4%
1980 to 1989	478	5.4%	258	2.9%
1990 to 1999	445	5.0%	612	6.8%
2000 to 2004	.	.	342	3.8%
2005 or Later	.	.	111	1.2%
Total	8,843	100.0%	9,011	100.0%

Table 36.A.9**Housing Units by Type**

36. City of Alliance

2000 Census SF3 & 2010 Five-Year ACS Data

Unit Type	2000 Census		2010 Five-Year ACS	
	Units	% of Total	Units	% of Total
Single-Family	6,750	69.9%	7,257	69.6%
Duplex	1,099	11.4%	804	7.7%
Tri- or Four-Plex	523	5.4%	610	5.9%
Apartment	1,253	13.0%	1,640	15.7%
Mobile Home	36	.4%	111	1.1%
Boat, RV, Van, Etc.	0	.0%	0	.0%
Total	9,661	100.0%	10,422	100.0%

Table 36.A.10**Housing Units by Tenure**

36. City of Alliance

2000 & 2010 Census SF1 Data

Tenure	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
Occupied Housing Units	8,908	91.6%	8,631	86.1%	-3.1%
Owner-Occupied	5,382	60.4%	4,745	55.0%	-11.8%
Renter-Occupied	3,526	39.6%	3,886	45.0%	10.2%
Vacant Housing Units	822	8.4%	1,391	13.9%	69.2%
Total Housing Units	9,730	100.0%	10,022	100.0%	3.0%

Table 36.A.11**Disposition of Vacant Housing Units**

36. City of Alliance

2000 & 2010 Census SF1 Data

Disposition	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
For Rent	397	48.3%	575	41.3%	44.8%
For Sale	139	16.9%	156	11.2%	12.2%
Rented or Sold, Not Occupied	114	13.9%	73	5.2%	-36.0%
For Seasonal, Recreational, or Occasional Use	16	1.9%	29	2.1%	81.3%
For Migrant Workers	0	0.0%	0	.0%	%
Other Vacant	156	19.0%	558	40.1%	257.7%
Total	822	100.0%	1,391	100.0%	69.2%

Table 36.A.12**Households by Household Size**

36. City of Alliance

2000 & 2010 Census SF1 Data

Size	2000 Census		2010 Census		% Change 00-10
	Households	% of Total	Households	% of Total	
One Person	2,745	30.8%	2,759	32.0%	.5%
Two Persons	2,920	32.8%	2,880	33.4%	-1.4%
Three Persons	1,366	15.3%	1,279	14.8%	-6.4%
Four Persons	1,057	11.9%	950	11.0%	-10.1%
Five Persons	534	6.0%	443	5.1%	-17.0%
Six Persons	200	2.2%	186	2.2%	-7.0%
Seven Persons or More	86	1.0%	134	1.6%	55.8%
Total	8,908	100.0%	8,631	100.0%	-3.1%

Table 36.A.13
Household Type by Tenure
 36. City of Alliance
 2000 & 2010 Census SF1 Data

Household Type	2000 Census		2010 Census		% Change 00–10
	Households	% of Total	Households	% of Total	
Family Households	5,668	63.6%	5,232	60.6%	-7.7%
Married-Couple Family	3,933	69.4%	3,244	62.0%	-17.5%
Owner-Occupied	3,083	78.4%	2,473	76.2%	-19.8%
Renter-Occupied	850	21.6%	771	23.8%	-9.3%
Other Family	1,735	30.6%	1,988	38.0%	14.6%
Male Householder, No Spouse	404	23.3%	512	25.8%	26.7%
Owner-Occupied	214	53.0%	233	45.5%	8.9%
Renter-Occupied	190	47.0%	279	54.5%	46.8%
Female Householder, No Spouse	1,331	76.7%	1,476	74.2%	10.9%
Owner-Occupied	583	43.8%	535	36.2%	-8.2%
Renter-Occupied	748	56.2%	941	63.8%	25.8%
Non-Family Households	3,240	36.4%	3,399	39.4%	4.9%
Owner-Occupied	1,502	46.4%	1,504	44.2%	.1%
Renter-Occupied	1,738	53.6%	1,895	55.8%	9.0%
Total	8,908	100.0%	8,631	100.0%	-3.1%

Table 36.A.14
Group Quarters Population
 36. City of Alliance
 2000 & 2010 Census SF1 Data

Group Quarters Type	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Institutionalized					
Correctional Institutions	0	.0%	0	.0%	%
Juvenile Facilities	.	.	0	.0%	.
Nursing Homes	380	97.9%	317	100.0%	-16.6%
Other Institutions	8	2.1%	0	.0%	-100.0%
Total	388	100.0%	317	100.0%	-18.3%
Noninstitutionalized					
College Dormitories	1,343	95.8%	1,423	95.0%	6.0%
Military Quarters	0	.0%	0	.0%	%
Other Noninstitutional	59	4.2%	75	5.0%	27.1%
Total	1,402	78.3%	1,498	82.5%	6.8%
Total Group Quarters Population	1,790	100.0%	1,815	100.0%	1.4%

Table 36.A.15
Overcrowding and Severe Overcrowding
 36. City of Alliance
 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	5,303	99.3%	38	.7%	0	.0%	5,341
2010 ACS	4,919	100.0%	0	.0%	0	.0%	4,919
Renter							
2000 Census	3,403	97.2%	77	2.2%	22	.6%	3,502
2010 ACS	4,004	97.8%	88	2.2%	0	.0%	4,092
Total							
2000 Census	8,706	98.5%	115	1.3%	22	.2%	8,843
2010 ACS	8,923	99.0%	88	1.0%	0	.0%	9,011

Table 36.A.16
Households with Incomplete Plumbing Facilities
 36. City of Alliance
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Plumbing Facilities	8,811	8,930
Lacking Complete Plumbing Facilities	32	81
Total Households	8,843	9,011
Percent Lacking	.4%	.9%

Table 36.A.17
Households with Incomplete Kitchen Facilities
 36. City of Alliance
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Kitchen Facilities	8,832	8,924
Lacking Complete Kitchen Facilities	11	87
Total Households	8,843	9,011
Percent Lacking	.1%	1.0%

Table 36.A.18
Cost Burden and Severe Cost Burden by Tenure
 36. City of Alliance
 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	2,393	77.6%	436	14.1%	247	8.0%	7	.2%	3,083
2010 ACS	2,077	67.8%	629	20.5%	344	11.2%	13	.4%	3,063
Owner Without a Mortgage									
2000 Census	1,709	89.9%	109	5.7%	60	3.2%	22	1.2%	1,900
2010 ACS	1,519	81.8%	226	12.2%	111	6.0%	0	.0%	1,856
Renter									
2000 Census	1,944	55.5%	751	21.4%	573	16.4%	234	6.7%	3,502
2010 ACS	2,184	53.4%	974	23.8%	821	20.1%	113	2.8%	4,092
Total									
2000 Census	6,046	71.3%	1,296	15.3%	880	10.4%	263	3.1%	8,485
2010 ACS	5,780	64.1%	1,829	20.3%	1,276	14.2%	126	1.4%	9,011

Table 36.A.19
Median Housing Costs
 36. City of Alliance
 2000 Census SF3 & 2010 Five-Year ACS Data

Housing Cost	2000 Census	2010 ACS
Median Contract Rent	\$712	\$429
Median Home Value	\$71,400	\$85,200

B. 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.⁴⁸ The information presented in this section presents detailed HMDA data, including denial rates and predatory lending including high annual percentage rate (APR) loans.

Table 36.B.1
Purpose of Loan by Year
36. City of Alliance
2004–2011 HMDA Data

Purpose	2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	507	585	734	358	263	182	179	156	2,964
Home Improvement	217	232	248	206	124	47	25	33	1,132
Refinancing	1,466	1,446	1,230	832	452	376	297	241	6,340
Total	2,190	2,263	2,212	1,396	839	605	501	430	10,436

Table 36.B.2
Occupancy Status for Home Purchase Loan Applications
36. City of Alliance
2004–2011 HMDA Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	Total
Owner-Occupied	429	502	620	311	234	167	164	137	2,564
Not Owner-Occupied	70	80	111	46	27	15	15	19	383
Not Applicable	8	3	3	1	2	0	0	0	17
Total	507	585	734	358	263	182	179	156	2,964

Table 36.B.3
Owner-Occupied Home Purchase Loan Applications by Loan Type
36. City of Alliance
2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Conventional	363	437	538	243	88	59	52	38	1,818
FHA - Insured	56	60	69	63	140	97	105	89	679
VA - Guaranteed	10	5	13	5	6	11	7	10	67
Rural Housing Service or Farm Service Agency	0	0	0	0	0	0	0	0	0
Total	429	502	620	311	234	167	164	137	2,564

⁴⁸ 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 36.B.4
Loan Applications by Action Taken
 36. City of Alliance
 2004–2011 HMDA Data

Action	2004	2005	2006	2007	2008	2009	2010	2011	Total
Loan Originated	211	246	287	153	127	90	98	66	1,278
Application Approved but not Accepted	40	49	37	16	9	5	6	4	166
Application Denied	65	69	125	42	32	15	13	25	386
Application Withdrawn by Applicant	25	38	37	17	8	8	8	1	142
File Closed for Incompleteness	13	6	11	5	13	2	0	2	52
Loan Purchased by the Institution	75	92	123	78	45	46	39	39	537
Preapproval Request Denied	0	2	0	0	0	1	0	0	3
Preapproval Approved but not Accepted	0	0	0	0	0	0	0	0	0
Total	429	502	620	311	234	167	164	137	2,564
Denial Rate	23.6%	21.9%	30.3%	21.5%	20.1%	14.3%	11.7%	27.5%	23.2%

Table 36.B.5
Denial Rates by Gender of Applicant
 36. City of Alliance
 2004–2011 HMDA Data

Year	Male	Female	Not Available	Not Applicable	Average
2004	19.6%	29.6%	30.0%	%	23.6%
2005	21.1%	22.6%	30.0%	%	21.9%
2006	26.6%	33.8%	46.2%	%	30.3%
2007	23.1%	14.8%	36.4%	%	21.5%
2008	16.7%	27.7%	33.3%	.0%	20.1%
2009	15.4%	14.3%	.0%	%	14.3%
2010	14.8%	8.9%	.0%	%	11.7%
2011	24.6%	32.1%	50.0%	%	27.5%
Average	21.4%	25.2%	33.3%	.0%	23.2%

Table 36.B.6
Loan Applications by Selected Action Taken by Gender of Applicant
 36. City of Alliance
 2004–2011 HMDA Data

Gender		2004	2005	2006	2007	2008	2009	2010	2011	Total
Male	Originated	135	150	177	100	90	55	52	46	805
	Denied	33	40	64	30	18	10	9	15	219
	Denial Rate	19.6%	21.1%	26.6%	23.1%	16.7%	15.4%	14.8%	24.6%	21.4%
Female	Originated	69	89	96	46	34	30	41	19	424
	Denied	29	26	49	8	13	5	4	9	143
	Denial Rate	29.6%	22.6%	33.8%	14.8%	27.7%	14.3%	8.9%	32.1%	25.2%
Not Available	Originated	7	7	14	7	2	5	5	1	48
	Denied	3	3	12	4	1	0	0	1	24
	Denial Rate	30.0%	30.0%	46.2%	36.4%	33.3%	.0%	.0%	50.0%	33.3%
Not Applicable	Originated	0	0	0	0	1	0	0	0	1
	Denied	0	0	0	0	0	0	0	0	0
	Denial Rate	%	%	%	%	.0%	%	%	%	.0%
Total	Originated	211	246	287	153	127	90	98	66	1,278
	Denied	65	69	125	42	32	15	13	25	386
	Denial Rate	23.6%	21.9%	30.3%	21.5%	20.1%	14.3%	11.7%	27.5%	23.2%

Table 36.B.7
Denial Rates by Race/Ethnicity of Applicant
 36. City of Alliance
 2004–2011 HMDA Data

Race/Ethnicity	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	.0%	%	.0%	%	%	.0%	.0%	%	.0%
Asian	.0%	75.0%	%	.0%	%	.0%	.0%	.0%	30.0%
Black	12.5%	.0%	60.0%	42.9%	40.0%	.0%	.0%	100.0%	33.9%
White	23.3%	21.6%	28.0%	19.1%	18.9%	15.6%	12.7%	26.4%	22.1%
Not Available	32.0%	29.4%	36.8%	42.9%	40.0%	.0%	.0%	50.0%	32.7%
Not Applicable	%	%	%	%	.0%	0%	0%	%	.0%
Average	23.6%	21.9%	30.3%	21.5%	20.1%	14.3%	11.7%	27.5%	23.2%
Non-Hispanic	22.2%	21.2%	28.8%	19.9%	19.3%	15.0%	12.5%	26.1%	22.2%
Hispanic	.0%	25.0%	100.0%	.0%	.0%	%	%	100.0%	25.0%

Table 36.B.8
Loan Applications by Selected Action Taken by Race/Ethnicity of Applicant
 36. City of Alliance
 2004–2011 HMDA Data

Race		2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Originated	1	0	1	0	0	2	2	0	6
	Denied	0	0	0	0	0	0	0	0	0
	Denial Rate	.0%	%	.0%	%	%	.0%	.0%	%	.0%
Asian	Originated	2	1	0	1	0	1	1	1	7
	Denied	0	3	0	0	0	0	0	0	3
	Denial Rate	.0%	75.0%	%	.0%	%	.0%	.0%	.0%	30.0%
Black	Originated	7	12	8	4	3	2	1	0	37
	Denied	1	0	12	3	2	0	0	1	19
	Denial Rate	12.5%	.0%	60.0%	42.9%	40.0%	.0%	.0%	100.0%	33.9%
White	Originated	184	221	254	140	120	81	89	64	1,153
	Denied	56	61	99	33	28	15	13	23	328
	Denial Rate	23.3%	21.6%	28.0%	19.1%	18.9%	15.6%	12.7%	26.4%	22.1%
Not Available	Originated	17	12	24	8	3	4	5	1	74
	Denied	8	5	14	6	2	0	0	1	36
	Denial Rate	32.0%	29.4%	36.8%	42.9%	40.0%	.0%	.0%	50.0%	32.7%
Not Applicable	Originated	0	0	0	0	1	0	0	0	1
	Denied	0	0	0	0	0	0	0	0	0
	Denial Rate	32.0%	29.4%	36.8%	42.9%	40.0%	.0%	.0%	50.0%	.0%
Total	Originated	211	246	287	153	127	90	98	66	1,278
	Denied	65	69	125	42	32	15	13	25	386
	Denial Rate	23.6%	21.9%	30.3%	21.5%	20.1%	14.3%	11.7%	27.5%	23.2%
Non-Hispanic	Originated	179	230	264	145	121	85	91	65	1,180
	Denied	51	62	107	36	29	15	13	23	336
	Denial Rate	22.2%	21.2%	28.8%	19.9%	19.3%	15.0%	12.5%	26.1%	22.2%
Hispanic	Originated	4	3	0	1	1	0	0	0	9
	Denied	0	1	1	0	0	0	0	1	3
	Denial Rate	.0%	25.0%	100.0%	.0%	.0%	%	%	100.0%	25.0%

Table 36.B.9
Loan Applications by Reason for Denial
 36. City of Alliance
 2004–2011 HMDA Data

Denial Reason	2004	2005	2006	2007	2008	2009	2010	2011	Total
Debt-to-Income Ratio	8	6	8	4	4	3	3	5	41
Employment History	0	2	5	0	1	0	1	2	11
Credit History	17	12	16	12	10	5	5	5	82
Collateral	3	3	10	4	3	0	2	3	28
Insufficient Cash	1	2	4	1	2	0	0	1	11
Unverifiable Information	2	2	3	0	0	2	0	1	10
Credit Application Incomplete	2	3	4	6	4	3	2	5	29
Mortgage Insurance Denied	0	0	0	0	0	0	0	0	0
Other	10	17	34	3	2	1	0	2	69
Missing	22	22	41	12	6	1	0	1	105
Total	65	69	125	42	32	15	13	25	386

Table 36.B.10
Denial Rates by Income of Applicant
 36. City of Alliance
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	54.5%	50.0%	50.0%	28.6%	60.0%	66.7%	33.3%	87.5%	53.7%
\$15,001–\$30,000	25.8%	26.8%	39.9%	25.0%	28.0%	10.7%	11.1%	33.3%	28.3%
\$30,001–\$45,000	26.2%	23.8%	28.9%	21.3%	17.8%	12.9%	6.9%	14.8%	22.6%
\$45,001–\$60,000	11.4%	13.8%	21.9%	11.5%	4.0%	23.8%	7.7%	.0%	14.5%
\$60,001–\$75,000	5.0%	5.3%	14.3%	18.2%	25.0%	.0%	27.3%	20.0%	12.9%
Above \$75,000	27.3%	20.0%	23.1%	25.0%	15.4%	.0%	6.7%	18.2%	18.4%
Data Missing	33.3%	14.3%	23.1%	.0%	%	50.0%	.0%	100.0%	23.1%
Total	23.6%	21.9%	30.3%	21.5%	20.1%	14.3%	11.7%	27.5%	23.2%

Table 36.B.11
Denial Rates of Loans by Race/Ethnicity and Income of Applicant
 36. City of Alliance
 2004–2011 HMDA Data

Race	<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	Above \$75K	Data Missing	Average
American Indian	.0%	.0%	.0%	.0%	%	.0%	%	.0%
Asian	%	.0%	100.0%	.0%	50.0%	.0%	%	30.0%
Black	100.0%	36.4%	38.9%	28.6%	25.0%	.0%	%	33.9%
White	54.2%	27.3%	21.0%	13.5%	11.1%	18.6%	25.0%	22.1%
Not Available	50.0%	40.5%	30.6%	28.6%	20.0%	27.3%	.0%	32.7%
Not Applicable	%	.0%	%	%	%	%	%	.0%
Average	53.7%	28.3%	22.6%	14.5%	12.9%	18.4%	23.1%	23.2%
Non-Hispanic Ethnicity	53.1%	27.9%	20.7%	14.1%	12.0%	17.5%	20.6%	22.2%
Hispanic (Ethnicity)	100.0%	.0%	33.3%	.0%	50.0%	.0%	%	25.0%

Table 36.B.12
Loan Applications by Reason for Denial by Race/Ethnicity of Applicant

36. City of Alliance
 2004–2011 HMDA Data

Denial Reason	American Indian	Asian	Black	White	Not Available	Not Applicable	Total	Hispanic (Ethnicity)
Debt-to-Income Ratio	0	0	1	37	3	0	41	0
Employment History	0	0	0	11	0	0	11	0
Credit History	0	0	3	73	6	0	82	0
Collateral	0	0	4	22	2	0	28	0
Insufficient Cash	0	0	1	9	1	0	11	0
Unverifiable Information	0	0	0	10	0	0	10	0
Credit Application Incomplete	0	1	1	23	4	0	29	0
Mortgage Insurance Denied	0	0	0	0	0	0	0	0
Other	0	2	5	55	7	0	69	1
Missing	0	0	4	88	13	0	105	2
Total	0	3	19	328	36	0	386	3
% Missing	%	.0%	21.1%	26.8%	36.1%	%	27.2%	66.7%

Table 36.B.13
Loan Applications by Income of Applicant: Originated and Denied

36. City of Alliance
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Loan Originated	5	4	3	5	2	1	4	1	25
	Application Denied	6	4	3	2	3	2	2	7	29
	Denial Rate	54.5%	50.0%	50.0%	28.6%	60.0%	66.7%	33.3%	87.5%	53.7%
\$15,001–\$30,000	Loan Originated	66	82	83	48	36	25	32	20	392
	Application Denied	23	30	55	16	14	3	4	10	155
	Denial Rate	25.8%	26.8%	39.9%	25.0%	28.0%	10.7%	11.1%	33.3%	28.3%
\$30,001–\$45,000	Loan Originated	62	64	96	48	37	27	27	23	384
	Application Denied	22	20	39	13	8	4	2	4	112
	Denial Rate	26.2%	23.8%	28.9%	21.3%	17.8%	12.9%	6.9%	14.8%	22.6%
\$45,001–\$60,000	Loan Originated	39	50	57	23	24	16	12	9	230
	Application Denied	5	8	16	3	1	5	1	0	39
	Denial Rate	11.4%	13.8%	21.9%	11.5%	4.0%	23.8%	7.7%	.0%	14.5%
\$60,001–\$75,000	Loan Originated	19	18	18	9	6	6	8	4	88
	Application Denied	1	1	3	2	2	0	3	1	13
	Denial Rate	5.0%	5.3%	14.3%	18.2%	25.0%	.0%	27.3%	20.0%	12.9%
Above \$75,000	Loan Originated	16	16	20	18	22	14	14	9	129
	Application Denied	6	4	6	6	4	0	1	2	29
	Denial Rate	27.3%	20.0%	23.1%	25.0%	15.4%	.0%	6.7%	18.2%	18.4%
Data Missing	Loan Originated	4	12	10	2	0	1	1	0	30
	Application Denied	2	2	3	0	0	1	0	1	9
	Denial Rate	33.3%	14.3%	23.1%	.0%	%	50.0%	.0%	100.0%	23.1%
Total	Loan Originated	211	246	287	153	127	90	98	66	1,278
	Application Denied	65	69	125	42	32	15	13	25	386
	Denial Rate	23.6%	21.9%	30.3%	21.5%	20.1%	14.3%	11.7%	27.5%	23.2%

Table 36.B.14
Loan Applications by Income and Race/Ethnicity of Applicant: Originated and Denied

36. City of Alliance
 2004–2011 HMDA Data

Race		<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	> \$75K	Data Missing	Total
American Indian	Loan Originated	1	1	1	2	0	1	0	6
	Application Denied	0	0	0	0	0	0	0	0
	Denial Rate	.0%	.0%	.0%	.0%	%	.0%	%	.0%
Asian	Loan Originated	0	3	0	1	1	2	0	7
	Application Denied	0	0	2	0	1	0	0	3
	Denial Rate	%	.0%	100.0%	.0%	50.0%	.0%	%	30.0%
Black	Loan Originated	0	14	11	5	3	4	0	37
	Application Denied	1	8	7	2	1	0	0	19
	Denial Rate	100.0%	36.4%	38.9%	28.6%	25.0%	.0%	%	33.9%
White	Loan Originated	22	351	347	212	80	114	27	1,153
	Application Denied	26	132	92	33	10	26	9	328
	Denial Rate	54.2%	27.3%	21.0%	13.5%	11.1%	18.6%	25.0%	22.1%
Not Available	Loan Originated	2	22	25	10	4	8	3	74
	Application Denied	2	15	11	4	1	3	0	36
	Denial Rate	50.0%	40.5%	30.6%	28.6%	20.0%	27.3%	.0%	32.7%
Not Applicable	Loan Originated	0	1	0	0	0	0	0	1
	Application Denied	0	0	0	0	0	0	0	0
	Denial Rate	%	.0%	%	%	%	%	%	.0%
Total	Loan Originated	25	392	384	230	88	129	30	1,278
	Application Denied	29	155	112	39	13	29	9	386
	Denial Rate	53.7%	28.3%	22.6%	14.5%	12.9%	18.4%	23.1%	23.2%
Non-Hispanic Ethnicity	Loan Originated	23	360	357	214	81	118	27	1,180
	Application Denied	26	139	93	35	11	25	7	336
	Denial Rate	53.1%	27.9%	20.7%	14.1%	12.0%	17.5%	20.6%	22.2%
Hispanic (Ethnicity)	Loan Originated	0	3	2	1	1	2	0	9
	Application Denied	1	0	1	0	1	0	0	3
	Denial Rate	100.0%	.0%	33.3%	.0%	50.0%	.0%	%	25.0%

PREDATORY LENDING

Table 36.B.15
Originated Owner-Occupied Loans by HAL Status

36. City of Alliance
 2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Other	169	158	169	122	95	83	98	66	960
HAL	42	88	118	31	32	7	0	0	318
Total	211	246	287	153	127	90	98	66	1,278
Percent HAL	19.9%	35.8%	41.1%	20.3%	25.2%	7.8%	.0%	.0%	24.9%

Table 36.B.16
Loans by Loan Purpose by HAL Status
 36. City of Alliance
 2004–2011 HMDA Data

Loan Purpose		2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	Other	169	158	169	122	95	83	98	66	960
	HAL	42	88	118	31	32	7	0	0	318
	Percent HAL	19.9%	35.8%	41.1%	20.3%	25.2%	7.8%	.0%	.0%	24.9%
Home Improvement	Other	35	33	54	35	23	8	3	7	198
	HAL	20	20	33	20	13	4	0	0	110
	Percent HAL	36.4%	37.7%	37.9%	36.4%	36.1%	33.3%	.0%	.0%	35.7%
Refinancing	Other	264	189	150	123	95	125	130	91	1,167
	HAL	128	142	131	57	30	20	6	1	515
	Percent HAL	32.7%	42.9%	46.6%	31.7%	24.0%	13.8%	4.4%	1.1%	30.6%
Total	Other	468	380	373	280	213	216	231	164	2,325
	HAL	190	250	282	108	32	7	0	0	943
	Percent HAL	28.9%	39.7%	43.1%	27.8%	26.0%	12.6%	2.5%	.6%	28.9%

Table 36.B.17
HALs Originated by Race of Borrower
 36. City of Alliance
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	0	0	1	0	0	0	0	0	1
Asian	0	0	0	1	0	0	0	0	1
Black	4	5	6	2	0	0	0	0	17
White	32	77	100	28	30	7	0	0	274
Not Available	6	6	11	0	2	0	0	0	25
Not Applicable	0	0	0	0	0	0	0	0	0
Total	42	88	118	31	32	7	0	0	318
Hispanic (Ethnicity)	1	2	0	0	0	0	0	0	3

Table 36.B.18
Rate of HALs Originated by Race/Ethnicity of Borrower
 36. City of Alliance
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	.0%	%	100.0%	%	%	.0%	.0%	%	16.7%
Asian	.0%	.0%	%	100.0%	%	.0%	.0%	.0%	14.3%
Black	57.1%	41.7%	75.0%	50.0%	.0%	.0%	.0%	%	45.9%
White	17.4%	34.8%	39.4%	20.0%	25.0%	8.6%	.0%	.0%	23.8%
Not Available	35.3%	50.0%	45.8%	.0%	66.7%	.0%	.0%	.0%	33.8%
Not Applicable	%	%	%	%	.0%	%	%	%	0%
Average	19.9%	35.8%	41.1%	20.3%	25.2%	7.8%	0.0%	0.0%	24.9%
Non-Hispanic Ethnicity	18.4%	34.8%	40.2%	21.4%	24.8%	8.2%	%	%	%
Hispanic (Ethnicity)	25.0%	66.7%	%	.0%	.0%	%	%	%	33.3%

Table 36.B.19
Loans by HAL Status by Race/Ethnicity of Borrower
 36. City of Alliance
 2004–2011 HMDA Data

Race	Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Other	1	0	0	0	0	2	2	0	5
	HAL	0	0	1	0	0	0	0	0	1
	Percent HAL	.0%	%	100.0%	%	%	.0%	.0%	%	16.7%
Asian	Other	2	1	0	0	0	1	1	1	6
	HAL	0	0	0	1	0	0	0	0	1
	Percent HAL	.0%	.0%	%	100.0%	%	.0%	.0%	.0%	14.3%
Black	Other	3	7	2	2	3	2	1	0	20
	HAL	4	5	6	2	0	0	0	0	17
	Percent HAL	57.1%	41.7%	75.0%	50.0%	.0%	.0%	.0%	%	45.9%
White	Other	152	144	154	112	90	74	89	64	879
	HAL	32	77	100	28	30	7	0	0	274
	Percent HAL	17.4%	34.8%	39.4%	20.0%	25.0%	8.6%	0.0%	0.0%	23.8%
Not Available	Other	11	6	13	8	1	4	5	1	49
	HAL	6	6	11	0	2	0	0	0	25
	Percent HAL	35.3%	50.0%	45.8%	.0%	66.7%	.0%	.0%	.0%	33.8%
Not Applicable	Other	0	0	0	0	1	0	0	0	1
	HAL	0	0	0	0	0	0	0	0	0
	Percent HAL	%	%	%	%	.0%	%	%	%	0.0%
Total	Other	169	158	169	122	95	83	98	66	960
	HAL	42	88	118	31	32	7	0	0	318
	Percent HAL	19.9%	35.8%	41.1%	20.3%	25.2%	7.8%	.0%	.0%	24.9%
Non-Hispanic Ethnicity	Other	146	150	158	114	91	78	91	65	893
	HAL	33	80	106	31	30	7			
	Percent HAL	18.4%	34.8%	40.2%	21.4%	24.8%	8.2%	%	%	%
Hispanic (Ethnicity)	Other	3	1	0	1	1	0	0	0	6
	HAL	1	2	0	0	0	0	0	0	3
	Percent HAL	25.0%	66.7%	%	.0%	.0%	%	%	%	33.3%

Table 36.B.20
Rates of HALs by Income of Borrower
 36. City of Alliance
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Average
\$15,000 or Below	20.0%	50.0%	33.3%	20.0%	50.0%	100.0%	.0%	.0%	28.0%
\$15,001–\$30,000	18.2%	40.2%	45.8%	29.2%	27.8%	16.0%	.0%	.0%	28.3%
\$30,001–\$45,000	25.8%	39.1%	43.8%	20.8%	35.1%	.0%	.0%	.0%	27.6%
\$45,001–\$60,000	28.2%	40.0%	35.1%	8.7%	20.8%	12.5%	.0%	.0%	26.1%
\$60,001–\$75,000	.0%	.0%	50.0%	11.1%	33.3%	.0%	.0%	.0%	13.6%
Above \$75,000	6.3%	18.8%	30.0%	11.1%	4.5%	.0%	0.0%	.0%	10.1%
Data Missing	25.0%	41.7%	20.0%	50.0%	%	.0%	.0%	%	30.0%
Average	19.9%	35.8%	41.1%	20.3%	25.2%	7.8%	.0%	.0%	24.9%

Table 36.B.21
Loans by HAL Status by Income of Borrower
 36. City of Alliance
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Other	4	2	2	4	1	0	4	1	18
	HAL	1	2	1	1	1	1	0	0	7
	Percent HAL	20.0%	50.0%	33.3%	20.0%	50.0%	100.0%	.0%	.0%	28.0%
\$15,001–\$30,000	Other	54	49	45	34	26	21	32	20	281
	HAL	12	33	38	14	10	4	0	0	111
	Percent HAL	18.2%	40.2%	45.8%	29.2%	27.8%	16.0%	.0%	.0%	28.3%
\$30,001–\$45,000	Other	46	39	54	38	24	27	27	23	278
	HAL	16	25	42	10	13	0	0	0	106
	Percent HAL	25.8%	39.1%	43.8%	20.8%	35.1%	.0%	.0%	.0%	27.6%
\$45,001–\$60,000	Other	28	30	37	21	19	14	12	9	170
	HAL	11	20	20	2	5	2	0	0	60
	Percent HAL	28.2%	40.0%	35.1%	8.7%	20.8%	12.5%	.0%	.0%	26.1%
\$60,001–\$75,000	Other	19	18	9	8	4	6	8	4	76
	HAL	0	0	9	1	2	0	0	0	12
	Percent HAL	.0%	.0%	50.0%	11.1%	33.3%	.0%	.0%	.0%	13.6%
Above \$75,000	Other	15	13	14	16	21	14	14	9	116
	HAL	1	3	6	2	1	0	0	0	13
	Percent HAL	6.3%	18.8%	30.0%	11.1%	4.5%	.0%	.0%	.0%	10.1%
Data Missing	Other	3	7	8	1	0	1	1	0	21
	HAL	1	5	2	1	0	0	0	0	9
	Percent HAL	25.0%	41.7%	20.0%	50.0%	%	.0%	.0%	%	30.0%
Total	Other	169	158	169	122	95	83	98	66	960
	HAL	42	88	118	31	32	7	0	0	318
	Percent HAL	19.9%	35.8%	41.1%	20.3%	25.2%	7.8%	.0%	.0%	24.9%

C. CRA DATA

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

Table 36.C.1
Small Business Loans Originated: \$100,000 or Less by Tract MFI
 36. City of Alliance
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	41	60	90	49		240
2001	37	72	102	48		259
2002	40	86	102	53		281
2003	50	115	193			358
2004	42	110	201			353
2005	51	114	191			356
2006	68	135	264			467
2007	58	152	298			508
2008	46	94	215			355
2009	16	33	82			131
2010	16	42	73			131
2011	18	48	136			202
Total	483	1,061	1,947	150	0	3,641
Loan Amount (\$1,000s)						
2000	359	951	1,236	569		3,115
2001	511	534	1,420	238		2,703
2002	423	917	1,321	488		3,149
2003	369	1,246	1,905			3,520
2004	348	961	1,905			3,214
2005	309	1,087	2,137			3,533
2006	774	1,587	2,398			4,759
2007	373	1,709	2,535			4,617
2008	523	849	1,891			3,263
2009	326	399	1,246			1,971
2010	215	858	1,198			2,271
2011	173	630	1,901			2,704
Total	4,703	11,728	21,093	1,295	0	38,819

Table 36.C.2
Small Business Loans Originated: \$100,001 to \$250,000 by Tract MFI
 36. City of Alliance
 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	3	8	0		11
2001	0	1	2	0		3
2002	3	4	4	1		12
2003	0	7	6			13
2004	0	2	7			9
2005	2	6	5			13
2006	0	3	7			10
2007	0	4	8			12
2008	0	1	2			3
2009	2	4	5			11
2010	2	5	4			11
2011	0	1	4			5
Total	9	41	62	1	0	113
Loan Amount (\$1,000s)						
2000	0	460	1,473	0		1,933
2001	0	238	338	0		576
2002	575	750	635	125		2,085
2003	0	1,233	1,035			2,268
2004	0	223	1,088			1,311
2005	433	995	938			2,366
2006	0	480	1,023			1,503
2007	0	805	1,098			1,903
2008	0	200	239			439
2009	251	683	831			1,765
2010	333	1,027	739			2,099
2011	0	125	639			764
Total	1,592	7,219	10,076	125	0	19,012

Table 36.C.3
Small Business Loans Originated: More than \$250,000 by Tract MFI
 36. City of Alliance
 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	1	5	4		10
2001	1	3	2	3		9
2002	0	5	4	1		10
2003	0	5	12			17
2004	0	1	7			8
2005	1	1	9			11
2006	0	3	2			5
2007	0	3	2			5
2008	0	3	2			5
2009	0	3	0			3
2010	0	4	2			6
2011	0	2	2			4
Total	2	34	49	8	0	93
Loan Amount (\$1,000s)						
2000	0	301	2,750	1,540		4,591
2001	330	1,450	2,000	1,209		4,989
2002	0	2,312	2,738	340		5,390
2003	0	2,736	6,272			9,008
2004	0	635	4,809			5,444
2005	300	996	4,860			6,156
2006	0	1,995	1,557			3,552
2007	0	2,250	1,225			3,475
2008	0	1,600	630			2,230
2009	0	1,638	0			1,638
2010	0	2,365	780			3,145
2011	0	1,250	610			1,860
Total	630	19,528	28,231	3,089	0	51,478

Table 36.C.4
Small Business Loans to Businesses with Gross Annual Revenues of Less Than \$1 Million by Tract MFI
 36. City of Alliance
 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	28	37	17		96
2001	22	26	50	15		113
2002	10	20	35	14		79
2003	15	37	60			112
2004	12	30	65			107
2005	19	46	94			159
2006	23	41	82			146
2007	25	46	93			164
2008	11	24	63			98
2009	7	9	19			35
2010	8	15	27			50
2011	5	20	62			87
Total	171	342	687	46	0	1,246
Loan Amount (\$1,000s)						
2000	200	1,244	2,455	197		4,096
2001	359	330	834	371		1,894
2002	282	2,338	1,922	688		5,230
2003	220	1,552	4,667			6,439
2004	115	295	1,650			2,060
2005	289	861	3,723			4,873
2006	451	941	2,312			3,704
2007	190	2,667	2,046			4,903
2008	134	429	854			1,417
2009	454	542	702			1,698
2010	429	324	724			1,477
2011	56	190	1,389			1,635
Total	3,179	11,713	23,278	1,256	0	39,426

D. 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 36.D.1
Fair Housing Complaints by Basis
36. City of Alliance
2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability		1		1		1		1		4
Family Status						1				1
Race			1					1		2
Total Bases		1	1	1		2		2		7
Total Complaints		1	1	1		2		2		7

Table 36.D.2
Fair Housing Complaints by Issue
36. City of Alliance
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	1						2
Failure to make reasonable accommodation					1			1		2
Discriminatory advertising, statements, and notices						1				1
Discriminatory terms, conditions, privileges, or services and facilities								1		1
Discrimination in services and facilities relating to rental						1				1
Total Issues	0	1	1	1	0	2	0	2	0	7
Total Complaints		1	1	1		2		2		7

Table 36.D.3
Fair Housing Complaints by Closure Status
36. City of Alliance
2004–2012 HUD Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Cause (FHAP)						1				1
Conciliated / Settled						1		1		2
No Cause		1	1	1				1		4
Total Complaints		1	1	1		2		2		7

HUD Complaints Found With Cause

Table 36.D.4
Fair Housing Complaints Found With Cause by Basis
 36. City of Alliance
 2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability						1		1		2
Family Status						1				1
Total Bases						2		1		3
Total Complaints						2		1		3

Table 36.D.5
Fair Housing Complaints Found With Cause by Issue
 36. City of Alliance
 2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Discriminatory advertising, statements, and notices						1				1
Discrimination in services and facilities relating to rental						1				1
Failure to make reasonable accommodation								1		1
Total Issues	0	0	0	0	0	2	0	1	0	3
Total Complaints						2		1		3

OHIO CIVIL RIGHTS COMMISSION COMPLAINTS

Table 36.D.6
Fair Housing Complaints by Basis
 36. City of Alliance
 2004–2012 OCRRC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability					2	3		1		6
Family Status									1	1
Race				1						1
Total Bases	0	0	0	1	2	3	0	1	1	8
Total Complaints				1	2	3		1	1	8

Table 36.D.7
Fair Housing Complaints by Issue
 36. City of Alliance
 2004–2012 OCRRC Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Reasonable Accommodation								1		1
Terms and Conditions				1	2	3			1	7
Total Issues	0	0	0	1	2	3	0	1	1	8
Total Complaints				1	2	3		1	1	8

Table 36.D.8
Fair Housing Complaints by Closure Status
 36. City of Alliance
 2004–2012 OCRC Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Administrative Closure					2	2				4
CP Withdrawal – No Benefit								1		1
No Cause Finding Issued				1						1
Settlement With Benefits						1			1	2
Total Complaints	0	0	0	1	2	3	0	1	1	8

FAIR HOUSING CONTACT SERVICE COMPLAINTS

Table 36.D.9
Fair Housing Complaints by Basis
 36. City of Alliance
 2004–2012 FHCS Data

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

Table 36.D.10
Fair Housing Complaints by Closure Status
 36. City of Alliance
 2004–2012 FHCS Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Lack of jurisdiction					1					1
No contact							1			1
No probable cause			1							1
Probable cause						1				1
Settled									1	1
Settled through OCRC					1					1
Total Complaints	0	0	1	0	2	1	1	0	1	6

E. 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 36.E.1
Primary Role of Respondent
 36. City of Alliance
 2012–2013 Fair Housing Survey for Housing
 Stakeholders Data

Primary Role	Total
Local Government	1
Total	1

FEDERAL, STATE, AND LOCAL LAWS

Table 36.E.2
Familiarity with Fair Housing Laws

36. City of Alliance
2012–2013 Fair Housing Survey
for Housing Stakeholders Data

Familiarity	Total
Not Familiar	0
Somewhat Familiar	0
Very Familiar	0
Missing	1
Total	1

Table 36.E.3
Perceptions About Fair Housing Laws

36. City of Alliance
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
Are fair housing laws difficult to understand or follow?				1	1
Do you think fair housing laws should be changed?				1	1
Do you think fair housing laws are adequately enforced?				1	1

Table 36.E.4
Fair Housing Activities

36. City of Alliance
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?					1	1
Have you participated in fair housing training?					1	1
Are you aware of any fair housing testing?					1	1
Testing and education	Too Little	Right Amount	Too Much	Don't Know	Missing	Total
Is there sufficient outreach and education activity?					1	1
Is there sufficient testing?					1	1

Table 36.E.5
Protected Classes

36. City of Alliance
2012–2013 Fair Housing Survey
for Housing Stakeholders Data

Protected Class	Total
Total	0

Table 36.E.6
Fair Housing Violation Referrals

36. City of Alliance
2012–2013 Fair Housing Survey for
Housing Stakeholders Data

Referral	Total
Total	0

LOCAL FAIR HOUSING

Table 36.E.7

Local Fair Housing

36. City of Alliance

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
Are there any specific geographic areas that have fair housing problems?				1	1
Are there any specific groups in that face housing discrimination?				1	1

FAIR HOUSING IN THE PRIVATE SECTOR

Table 36.E.8

Barriers to Fair Housing in the Private Sector

36. City of Alliance

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
The real estate industry?				1	1
The mortgage and home lending industry?				1	1
The housing construction or accessible housing design fields?				1	1
The home insurance industry?				1	1
The home appraisal industry?				1	1
Any other housing services?				1	1

FAIR HOUSING IN THE PUBLIC SECTOR

Table 36.E.9

Barriers to Fair Housing in the Public Sector

36. City of Alliance

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
Zoning laws?				1	1
Occupancy standards or health and safety codes?				1	1
Property tax policies?				1	1
Permitting process?				1	1
Housing construction standards?				1	1
Neighborhood or community development policies?				1	1
Limited access to government services, such as employment services?				1	1
Public administrative actions or regulations?				1	1

F. 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 36.F.1
Housing Development
 36. City of Alliance
 2012 Land Use Planning Interview Data

Question: Does your jurisdiction...	Response
Housing Development	
Have a definition for the term "dwelling unit"?	No
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?	Yes
Special Needs Housing	
Have a definition for the term "disability"?	No
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?	Don't know
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"?	Don't know

G. IMPEDIMENTS

The 2013 Northeast Ohio Regional Analysis of Impediments to Fair Housing Choice uncovered several potential issues regarding fair housing in the City of Alliance. 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 Alliance.

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 Alliance.

Results of the Fair Housing Surveys indicate that the City may not have sufficient policies or practices that completely address the duty to affirmatively further fair housing.

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 City of Alliance 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 the City of Alliance.

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 in the City of Alliance. 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 36.G.1
Impediments Matrix
 36. City of Alliance
 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 ⁴⁹		
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	Lack of inclusionary policies							X		X	All	M

⁴⁹ 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.

37. CITY OF CANTON

A. CENSUS BUREAU DATA

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

Table 37.A.1

Population by Age

37. City of Canton

2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Under 5	6,309	7.8%	5,744	7.9%	-9.0%
5 to 19	17,565	21.7%	14,934	20.5%	-15.0%
20 to 24	5,547	6.9%	5,510	7.5%	-.7%
25 to 34	11,613	14.4%	9,768	13.4%	-15.9%
35 to 54	22,052	27.3%	19,159	26.2%	-13.1%
55 to 64	6,164	7.6%	8,517	11.7%	38.2%
65 or Older	11,556	14.3%	9,375	12.8%	-18.9%
Total	80,806	100.0%	73,007	100.0%	-9.7%

Table 37.A.2

Elderly Population by Age

37. City of Canton

2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
65 to 66	1,026	8.9%	1,167	12.4%	13.7%
67 to 69	1,560	13.5%	1,398	14.9%	-10.4%
70 to 74	2,912	25.2%	2,045	21.8%	-29.8%
75 to 79	2,581	22.3%	1,635	17.4%	-36.7%
80 to 84	1,817	15.7%	1,557	16.6%	-14.3%
85 or Older	1,660	14.4%	1,573	16.8%	-5.2%
Total	11,556	100.0%	9,375	100.0%	-18.9%

Table 37.A.3

Population by Race and Ethnicity

37. City of Canton

2000 & 2010 Census SF1 Data

Race	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
White	60,164	74.5%	50,458	69.1%	-16.1%
Black	16,999	21.0%	17,666	24.2%	3.9%
American Indian	396	.5%	349	.5%	-11.9%
Asian	257	.3%	253	.3%	-1.6%
Native Hawaiian/ Pacific Islander	24	.0%	35	.0%	45.8%
Other	492	.6%	734	1.0%	49.2%
Two or More Races	2,474	3.1%	3,512	4.8%	42.0%
Total	80,806	100.0%	73,007	100.0%	-9.7%
Non-Hispanic	79,800	98.8	71,108	97.4%	-10.9%
Hispanic	1,006	1.2%	1,899	2.6%	88.8%

Table 37.A.4
Disability by Age
 37. City of Canton
 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%	54	1.8%	54	.9%
5 to 17	696	10.4%	319	5.0%	1,015	7.8%
18 to 34	666	8.4%	597	6.6%	1,263	7.5%
35 to 64	3,029	23.0%	3,255	22.3%	6,284	22.6%
65 to 74	614	30.8%	798	32.6%	1,412	31.8%
75 or Older	684	46.6%	1,824	58.9%	2,508	54.9%
Total	5,689	16.6%	6,847	17.8%	12,536	17.2%

Table 37.A.5
Employment Status by Disability and Type: Age 18 to 64
 37. City of Canton
 2010 Three-Year ACS Data

Disability Status	Population
Employed:	28,224
With a disability:	1,677
With a hearing difficulty	320
With a vision difficulty	417
With a cognitive difficulty	646
With an ambulatory difficulty	827
With a self-care difficulty	97
With an independent living difficulty	264
No disability	26,547
Unemployed:	4,850
With a disability:	696
With a hearing difficulty	218
With a vision difficulty	99
With a cognitive difficulty	187
With an ambulatory difficulty	230
With a self-care difficulty	16
With an independent living difficulty	151
No disability	4,154
Not in labor force:	11,623
With a disability:	5,174
With a hearing difficulty	518
With a vision difficulty	679
With a cognitive difficulty	2,624
With an ambulatory difficulty	3,250
With a self-care difficulty	919
With an independent living difficulty	2,092
No disability	6,449
Total	44,697

Table 37.A.6
Households by Income

37. City of Canton
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	8,449	25.9%	7,803	25.4%
\$15,000 to \$19,999	2,820	8.7%	2,631	8.6%
\$20,000 to \$24,999	3,034	9.3%	2,490	8.1%
\$25,000 to \$34,999	5,024	15.4%	4,989	16.2%
\$35,000 to \$49,999	5,704	17.5%	4,583	14.9%
\$50,000 to \$74,999	4,625	14.2%	4,296	14.0%
\$75,000 to \$99,999	1,579	4.8%	2,236	7.3%
\$100,000 or More	1,329	4.1%	1,713	5.6%
Total	32,564	100.0%	30,741	100.0%

Table 37.A.7
Poverty by Age

37. City of Canton
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	2,343	15.7%	3,607	18.5%
6 to 17	3,517	23.5%	4,267	21.9%
18 to 64	7,902	52.8%	10,286	52.9%
65 or Older	1,195	8.0%	1,288	6.6%
Total	14,957	100.0%	19,448	100.0%
Poverty Rate	19.2%	.	27.1%	.

Table 37.A.8
Households by Year Home Built

37. City of Canton
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	13,907	42.8%	12,959	42.2%
1940 to 1949	5,036	15.5%	4,264	13.9%
1950 to 1959	5,560	17.1%	5,293	17.2%
1960 to 1969	3,491	10.7%	2,598	8.5%
1970 to 1979	2,631	8.1%	2,517	8.2%
1980 to 1989	1,152	3.5%	1,296	4.2%
1990 to 1999	753	2.3%	925	3.0%
2000 to 2004	.	.	688	2.2%
2005 or Later	.	.	201	.7%
Total	32,530	100.0%	30,741	100.0%

Table 37.A.9**Housing Units by Type**

37. City of Canton

2000 Census SF3 & 2010 Five-Year ACS Data

Unit Type	2000 Census		2010 Five-Year ACS	
	Units	% of Total	Units	% of Total
Single-Family	24,818	70.0%	25,846	71.9%
Duplex	3,726	10.5%	3,066	8.5%
Tri- or Four-Plex	1,926	5.4%	1,660	4.6%
Apartment	4,928	13.9%	5,318	14.8%
Mobile Home	79	.2%	62	.2%
Boat, RV, Van, Etc.	0	.0%	0	.0%
Total	35,477	100.0%	35,952	100.0%

Table 37.A.10**Housing Units by Tenure**

37. City of Canton

2000 & 2010 Census SF1 Data

Tenure	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
Occupied Housing Units	32,489	91.5%	29,705	85.9%	-8.6%
Owner-Occupied	19,394	59.7%	15,837	53.3%	-18.3%
Renter-Occupied	13,095	40.3%	13,868	46.7%	5.9%
Vacant Housing Units	3,013	8.5%	4,866	14.1%	61.5%
Total Housing Units	35,502	100.0%	34,571	100.0%	-2.6%

Table 37.A.11**Disposition of Vacant Housing Units**

37. City of Canton

2000 & 2010 Census SF1 Data

Disposition	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
For Rent	1,485	49.3%	1,618	33.3%	9.0%
For Sale	432	14.3%	712	14.6%	64.8%
Rented or Sold, Not Occupied	321	10.7%	143	2.9%	-55.5%
For Seasonal, Recreational, or Occasional Use	49	1.6%	73	1.5%	49.0%
For Migrant Workers	0	0.0%	0	.0%	%
Other Vacant	726	24.1%	2,320	47.7%	219.6%
Total	3,013	100.0%	4,866	100.0%	61.5%

Table 37.A.12**Households by Household Size**

37. City of Canton

2000 & 2010 Census SF1 Data

Size	2000 Census		2010 Census		% Change 00-10
	Households	% of Total	Households	% of Total	
One Person	10,727	33.0%	10,507	35.4%	-2.1%
Two Persons	9,896	30.5%	8,787	29.6%	-11.2%
Three Persons	5,045	15.5%	4,557	15.3%	-9.7%
Four Persons	3,826	11.8%	3,064	10.3%	-19.9%
Five Persons	1,871	5.8%	1,633	5.5%	-12.7%
Six Persons	708	2.2%	724	2.4%	2.3%
Seven Persons or More	416	1.3%	433	1.5%	4.1%
Total	32,489	100.0%	29,705	100.0%	-8.6%

Table 37.A.13
Household Type by Tenure
 37. City of Canton
 2000 & 2010 Census SF1 Data

Household Type	2000 Census		2010 Census		% Change 00–10
	Households	% of Total	Households	% of Total	
Family Households	19,772	60.9%	17,127	57.7%	-13.4%
Married-Couple Family	12,050	60.9%	9,155	53.5%	-24.0%
Owner-Occupied	9,792	81.3%	7,159	78.2%	-26.9%
Renter-Occupied	2,258	18.7%	1,996	21.8%	-11.6%
Other Family	7,722	39.1%	7,972	46.5%	3.2%
Male Householder, No Spouse	1,523	19.7%	1,691	21.2%	11.0%
Owner-Occupied	836	54.9%	850	50.3%	1.7%
Renter-Occupied	687	45.1%	841	49.7%	22.4%
Female Householder, No Spouse	6,199	80.3%	6,281	78.8%	1.3%
Owner-Occupied	2,686	43.3%	2,297	36.6%	-14.5%
Renter-Occupied	3,513	56.7%	3,984	63.4%	13.4%
Non-Family Households	12,717	39.1%	12,578	42.3%	-1.1%
Owner-Occupied	6,080	47.8%	5,531	44.0%	-9.0%
Renter-Occupied	6,637	52.2%	7,047	56.0%	6.2%
Total	32,489	100.0%	29,705	100.0%	-8.6%

Table 37.A.14
Group Quarters Population
 37. City of Canton
 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	26.9%	546	43.5%	30.3%
Juvenile Facilities	.	.	8	.6%	.
Nursing Homes	1,124	72.3%	701	55.8%	-37.6%
Other Institutions	12	.8%	1	.1%	-91.7%
Total	1,555	100.0%	1,256	100.0%	-19.2%
Noninstitutionalized					
College Dormitories	807	54.3%	1,031	55.9%	27.8%
Military Quarters	0	.0%	0	.0%	%
Other Noninstitutional	680	45.7%	815	44.1%	19.9%
Total	1,487	48.9%	1,846	59.5%	24.1%
Total Group Quarters Population	3,042	100.0%	3,102	100.0%	2.0%

Table 37.A.15
Overcrowding and Severe Overcrowding
 37. City of Canton
 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	19,190	99.0%	149	.8%	36	.2%	19,375
2010 ACS	17,208	99.3%	123	.7%	0	.0%	17,331
Renter							
2000 Census	12,724	96.7%	310	2.4%	121	.9%	13,155
2010 ACS	12,953	96.6%	292	2.2%	165	1.2%	13,410
Total							
2000 Census	31,914	98.1%	459	1.4%	157	.5%	32,530
2010 ACS	30,161	98.1%	415	1.3%	165	.5%	30,741

Table 37.A.16
Households with Incomplete Plumbing Facilities
 37. City of Canton
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Plumbing Facilities	32,362	30,646
Lacking Complete Plumbing Facilities	168	95
Total Households	32,530	30,741
Percent Lacking	.5%	.3%

Table 37.A.17
Households with Incomplete Kitchen Facilities
 37. City of Canton
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Kitchen Facilities	32,331	30,495
Lacking Complete Kitchen Facilities	199	246
Total Households	32,530	30,741
Percent Lacking	.6%	.8%

Table 37.A.18
Cost Burden and Severe Cost Burden by Tenure
 37. City of Canton
 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	8,824	73.6%	2,023	16.9%	1,054	8.8%	86	.7%	11,987
2010 ACS	7,709	65.4%	2,450	20.8%	1,521	12.9%	107	.9%	11,787
Owner Without a Mortgage									
2000 Census	5,712	88.8%	363	5.6%	221	3.4%	136	2.1%	6,432
2010 ACS	4,687	84.5%	379	6.8%	419	7.6%	59	1.1%	5,544
Renter									
2000 Census	7,414	56.5%	2,466	18.8%	2,246	17.1%	1,003	7.6%	13,129
2010 ACS	5,857	43.7%	3,372	25.1%	3,328	24.8%	853	6.4%	13,410
Total									
2000 Census	21,950	69.6%	4,852	15.4%	3,521	11.2%	1,225	3.9%	31,548
2010 ACS	18,253	59.4%	6,201	20.2%	5,268	17.1%	1,019	3.3%	30,741

Table 37.A.19
Median Housing Costs
 37. City of Canton
 2000 Census SF3 & 2010 Five-Year ACS Data

Housing Cost	2000 Census	2010 ACS
Median Contract Rent	\$352	\$437
Median Home Value	\$66,300	\$82,000

B. BLS DATA

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

Table 37.B.1
Labor Force Statistics
 37. City of Canton
 1990–2011 BLS Data

Year	Labor Force	Employment	Unemployment	Unemployment Rate	Statewide Unemployment Rate
1990	37,448	33,772	3,676	9.8%	5.7%
1991	38,048	33,827	4,221	11.1%	6.6%
1992	38,474	33,780	4,694	12.2%	7.4%
1993	38,037	33,763	4,274	11.2%	6.7%
1994	37,750	34,188	3,562	9.4%	5.6%
1995	37,706	34,712	2,994	7.9%	4.9%
1996	38,379	35,055	3,324	8.7%	5.0%
1997	38,224	35,245	2,979	7.8%	4.6%
1998	38,046	35,481	2,565	6.7%	4.3%
1999	37,890	35,161	2,729	7.2%	4.3%
2000	37,527	34,907	2,620	7.0%	4.0%
2001	37,698	34,949	2,749	7.3%	4.4%
2002	37,866	34,156	3,710	9.8%	5.7%
2003	36,408	33,553	2,855	7.8%	6.2%
2004	36,086	33,267	2,819	7.8%	6.1%
2005	35,825	33,087	2,738	7.6%	5.9%
2006	35,457	32,998	2,459	6.9%	5.4%
2007	35,461	33,067	2,394	6.8%	5.6%
2008	35,647	32,803	2,844	8.0%	6.5%
2009	35,567	31,222	4,345	12.2%	10.1%
2010	33,166	28,905	4,261	12.8%	10.0%
2011	32,772	29,231	3,541	10.8%	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.⁵⁰ The information presented in this section presents detailed HMDA data, including denial rates and predatory lending including high annual percentage rate (APR) loans.

Table 37.C.1
Purpose of Loan by Year
37. City of Canton
2004–2011 HMDA Data

Purpose	2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	2,349	2,629	2,438	1,521	892	781	646	588	11,844
Home Improvement	689	695	882	681	542	276	234	244	4,243
Refinancing	5,760	5,570	4,746	3,119	1,732	1,622	1,251	1,019	24,819
Total	8,798	8,894	8,066	5,321	3,166	2,679	2,131	1,851	40,906

Table 37.C.2
Occupancy Status for Home Purchase Loan Applications
37. City of Canton
2004–2011 HMDA Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	Total
Owner-Occupied	1,940	2,124	2,061	1,163	756	712	593	541	9,890
Not Owner-Occupied	371	485	368	345	134	68	53	45	1,869
Not Applicable	38	20	9	13	2	1	0	2	85
Total	2,349	2,629	2,438	1,521	892	781	646	588	11,844

Table 37.C.3
Owner-Occupied Home Purchase Loan Applications by Loan Type
37. City of Canton
2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Conventional	1,594	1,843	1,822	890	309	170	143	173	6,944
FHA - Insured	304	244	206	254	419	510	430	352	2,719
VA - Guaranteed	42	37	33	19	28	31	19	16	225
Rural Housing Service or Farm Service Agency	0	0	0	0	0	1	1	0	2
Total	1,940	2,124	2,061	1,163	756	712	593	541	9,890

⁵⁰ 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 37.C.4
Loan Applications by Action Taken
 37. City of Canton
 2004–2011 HMDA Data

Action	2004	2005	2006	2007	2008	2009	2010	2011	Total
Loan Originated	961	1,035	976	584	397	349	273	245	4,820
Application Approved but not Accepted	141	147	146	34	34	13	19	13	547
Application Denied	307	351	312	202	89	55	56	45	1,417
Application Withdrawn by Applicant	109	139	118	65	37	28	27	19	542
File Closed for Incompleteness	55	33	37	18	6	9	2	3	163
Loan Purchased by the Institution	367	415	469	258	193	258	216	216	2,392
Preapproval Request Denied	0	4	3	2	0	0	0	0	9
Preapproval Approved but not Accepted	0	0	0	0	0	0	0	0	0
Total	1,940	2,124	2,061	1,163	756	712	593	541	9,890
Denial Rate	24.2%	25.3%	24.2%	25.7%	18.3%	13.6%	17.0%	15.5%	22.7%

Table 37.C.5
Denial Rates by Gender of Applicant
 37. City of Canton
 2004–2011 HMDA Data

Year	Male	Female	Not Available	Not Applicable	Average
2004	20.9%	24.2%	76.1%	%	24.2%
2005	20.3%	28.8%	54.8%	%	25.3%
2006	24.7%	21.2%	45.3%	%	24.2%
2007	22.6%	26.8%	65.4%	.0%	25.7%
2008	17.0%	19.5%	27.8%	%	18.3%
2009	12.4%	13.6%	40.0%	%	13.6%
2010	14.2%	20.0%	33.3%	%	17.0%
2011	16.1%	13.4%	30.0%	%	15.5%
Average	20.3%	23.1%	53.2%	.0%	22.7%

Table 37.C.6
Loan Applications by Selected Action Taken by Gender of Applicant
 37. City of Canton
 2004–2011 HMDA Data

Gender		2004	2005	2006	2007	2008	2009	2010	2011	Total
Male	Originated	571	626	557	342	244	190	169	141	2,840
	Denied	151	159	183	100	50	27	28	27	725
	Denial Rate	20.9%	20.3%	24.7%	22.6%	17.0%	12.4%	14.2%	16.1%	20.3%
Female	Originated	379	376	390	232	140	153	96	97	1,863
	Denied	121	152	105	85	34	24	24	15	560
	Denial Rate	24.2%	28.8%	21.2%	26.8%	19.5%	13.6%	20.0%	13.4%	23.1%
Not Available	Originated	11	33	29	9	13	6	8	7	116
	Denied	35	40	24	17	5	4	4	3	132
	Denial Rate	76.1%	54.8%	45.3%	65.4%	27.8%	40.0%	33.3%	30.0%	53.2%
Not Applicable	Originated	0	0	0	1	0	0	0	0	1
	Denied	0	0	0	0	0	0	0	0	0
	Denial Rate	%	%	%	.0%	%	%	%	%	.0%
Total	Originated	961	1,035	976	584	397	349	273	245	4,820
	Denied	307	351	312	202	89	55	56	45	1,417
	Denial Rate	24.2%	25.3%	24.2%	25.7%	18.3%	13.6%	17.0%	15.5%	22.7%

Table 37.C.7
Denial Rates by Race/Ethnicity of Applicant
 37. City of Canton
 2004–2011 HMDA Data

Race/Ethnicity	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	60.0%	42.9%	100.0%	75.0%	.0%	%	%	%	55.0%
Asian	33.3%	50.0%	.0%	.0%	%	.0%	.0%	%	20.0%
Black	40.6%	34.3%	33.1%	38.9%	31.9%	26.9%	30.0%	23.1%	35.0%
White	18.4%	20.4%	20.1%	20.3%	16.3%	11.3%	14.9%	13.9%	18.3%
Not Available	51.8%	45.6%	47.7%	65.2%	25.0%	46.7%	29.4%	33.3%	47.2%
Not Applicable	20.0%	%	%	.0%	%	0%	0%	%	16.7%
Average	24.2%	25.3%	24.2%	25.7%	18.3%	13.6%	17.0%	15.5%	22.7%
Non-Hispanic	21.0%	22.4%	21.9%	22.7%	17.3%	11.7%	16.3%	14.1%	20.1%
Hispanic	50.0%	38.5%	16.7%	38.5%	.0%	40.0%	.0%	20.0%	36.9%

Table 37.C.8
Loan Applications by Selected Action Taken by Race/Ethnicity of Applicant
 37. City of Canton
 2004–2011 HMDA Data

Race		2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Originated	2	4	0	1	2	0	0	0	9
	Denied	3	3	2	3	0	0	0	0	11
	Denial Rate	60.0%	42.9%	100.0%	75.0%	.0%	%	%	%	55.0%
Asian	Originated	6	1	2	5	0	1	1	0	16
	Denied	3	1	0	0	0	0	0	0	4
	Denial Rate	33.3%	50.0%	.0%	.0%	%	.0%	.0%	%	20.0%
Black	Originated	85	134	113	69	32	19	21	20	493
	Denied	58	70	56	44	15	7	9	6	265
	Denial Rate	40.6%	34.3%	33.1%	38.9%	31.9%	26.9%	30.0%	23.1%	35.0%
White	Originated	809	815	805	492	339	321	239	217	4,037
	Denied	183	209	203	125	66	41	42	35	904
	Denial Rate	18.4%	20.4%	20.1%	20.3%	16.3%	11.3%	14.9%	13.9%	18.3%
Not Available	Originated	55	81	56	16	24	8	12	8	260
	Denied	59	68	51	30	8	7	5	4	232
	Denial Rate	51.8%	45.6%	47.7%	65.2%	25.0%	46.7%	29.4%	33.3%	47.2%
Not Applicable	Originated	4	0	0	1	0	0	0	0	5
	Denied	1	0	0	0	0	0	0	0	1
	Denial Rate	51.8%	45.6%	47.7%	65.2%	25.0%	46.7%	29.4%	33.3%	16.7%
Total	Originated	961	1,035	976	584	397	349	273	245	4,820
	Denied	307	351	312	202	89	55	56	45	1,417
	Denial Rate	24.2%	25.3%	24.2%	25.7%	18.3%	13.6%	17.0%	15.5%	22.7%
Non-Hispanic	Originated	815	941	901	562	373	338	261	232	4,423
	Denied	216	271	252	165	78	45	51	38	1,116
	Denial Rate	21.0%	22.4%	21.9%	22.7%	17.3%	11.7%	16.3%	14.1%	20.1%
Hispanic	Originated	17	16	15	8	1	3	1	4	65
	Denied	17	10	3	5	0	2	0	1	38
	Denial Rate	50.0%	38.5%	16.7%	38.5%	.0%	40.0%	.0%	20.0%	36.9%

Table 37.C.9
Loan Applications by Reason for Denial
 37. City of Canton
 2004–2011 HMDA Data

Denial Reason	2004	2005	2006	2007	2008	2009	2010	2011	Total
Debt-to-Income Ratio	28	38	21	18	12	7	8	6	138
Employment History	6	5	8	5	2	4	3	4	37
Credit History	48	76	48	40	23	13	24	15	287
Collateral	19	20	22	16	16	7	3	6	109
Insufficient Cash	4	4	3	7	1	0	3	2	24
Unverifiable Information	8	11	15	8	2	1	2	1	48
Credit Application Incomplete	13	18	16	21	5	4	3	3	83
Mortgage Insurance Denied	1	0	0	0	0	1	0	0	2
Other	77	101	56	16	4	5	4	5	268
Missing	103	78	123	71	24	13	6	3	421
Total	307	351	312	202	89	55	56	45	1,417

Table 37.C.10
Denial Rates by Income of Applicant
 37. City of Canton
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	47.9%	47.3%	46.3%	60.0%	27.3%	18.2%	44.4%	57.1%	46.3%
\$15,001–\$30,000	27.1%	31.4%	29.0%	27.3%	22.3%	14.4%	20.5%	14.7%	26.5%
\$30,001–\$45,000	20.6%	19.0%	22.8%	28.2%	19.4%	13.6%	7.8%	13.6%	20.3%
\$45,001–\$60,000	18.0%	18.5%	18.2%	19.8%	11.3%	12.1%	11.4%	11.4%	16.9%
\$60,001–\$75,000	13.8%	21.5%	16.5%	15.4%	16.7%	6.1%	25.0%	20.7%	16.9%
Above \$75,000	15.7%	15.6%	17.2%	15.9%	10.8%	16.7%	15.6%	14.3%	15.6%
Data Missing	61.5%	48.6%	26.9%	26.3%	22.2%	50.0%	25.0%	.0%	42.2%
Total	24.2%	25.3%	24.2%	25.7%	18.3%	13.6%	17.0%	15.5%	22.7%

Table 37.C.11
Denial Rates of Loans by Race/Ethnicity and Income of Applicant
 37. City of Canton
 2004–2011 HMDA Data

Race	<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	Above \$75K	Data Missing	Average
American Indian	%	80.0%	50.0%	33.3%	.0%	66.7%	%	55.0%
Asian	.0%	37.5%	.0%	.0%	%	.0%	50.0%	20.0%
Black	52.9%	38.2%	30.5%	29.0%	31.6%	23.5%	60.0%	35.0%
White	45.1%	21.6%	16.7%	13.1%	11.4%	13.2%	27.5%	18.3%
Not Available	47.1%	48.5%	41.8%	45.2%	54.3%	31.4%	84.6%	47.2%
Not Applicable	%	50.0%	%	.0%	%	.0%	.0%	16.7%
Average	46.3%	26.5%	20.3%	16.9%	16.9%	15.6%	42.2%	22.7%
Non-Hispanic Ethnicity	44.7%	23.9%	18.3%	14.7%	12.9%	13.6%	33.0%	20.1%
Hispanic (Ethnicity)	83.3%	35.4%	20.0%	40.0%	.0%	55.6%	57.1%	36.9%

Table 37.C.12
Loan Applications by Reason for Denial by Race/Ethnicity of Applicant

37. City of Canton
 2004–2011 HMDA Data

Denial Reason	American Indian	Asian	Black	White	Not Available	Not Applicable	Total	Hispanic (Ethnicity)
Debt-to-Income Ratio	2	1	22	101	12	0	138	5
Employment History	0	0	4	29	4	0	37	0
Credit History	3	1	63	186	34	0	287	7
Collateral	1	0	20	77	11	0	109	4
Insufficient Cash	1	0	1	17	5	0	24	0
Unverifiable Information	0	0	15	26	7	0	48	2
Credit Application Incomplete	1	1	12	57	12	0	83	2
Mortgage Insurance Denied	0	0	1	1	0	0	2	0
Other	0	1	40	181	45	1	268	5
Missing	3	0	87	229	102	0	421	13
Total	11	4	265	904	232	1	1,417	38
% Missing	27.3%	.0%	32.8%	25.3%	44.0%	.0%	29.7%	34.2%

Table 37.C.13
Loan Applications by Income of Applicant: Originated and Denied

37. City of Canton
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Loan Originated	25	29	22	10	8	9	10	3	116
	Application Denied	23	26	19	15	3	2	8	4	100
	Denial Rate	47.9%	47.3%	46.3%	60.0%	27.3%	18.2%	44.4%	57.1%	46.3%
\$15,001–\$30,000	Loan Originated	337	354	313	186	115	125	93	81	1,604
	Application Denied	125	162	128	70	33	21	24	14	577
	Denial Rate	27.1%	31.4%	29.0%	27.3%	22.3%	14.4%	20.5%	14.7%	26.5%
\$30,001–\$45,000	Loan Originated	301	329	311	176	133	95	83	76	1,504
	Application Denied	78	77	92	69	32	15	7	12	382
	Denial Rate	20.6%	19.0%	22.8%	28.2%	19.4%	13.6%	7.8%	13.6%	20.3%
\$45,001–\$60,000	Loan Originated	168	167	153	101	71	58	39	31	788
	Application Denied	37	38	34	25	9	8	5	4	160
	Denial Rate	18.0%	18.5%	18.2%	19.8%	11.3%	12.1%	11.4%	11.4%	16.9%
\$60,001–\$75,000	Loan Originated	56	62	81	44	30	31	18	23	345
	Application Denied	9	17	16	8	6	2	6	6	70
	Denial Rate	13.8%	21.5%	16.5%	15.4%	16.7%	6.1%	25.0%	20.7%	16.9%
Above \$75,000	Loan Originated	59	76	77	53	33	30	27	30	385
	Application Denied	11	14	16	10	4	6	5	5	71
	Denial Rate	15.7%	15.6%	17.2%	15.9%	10.8%	16.7%	15.6%	14.3%	15.6%
Data Missing	Loan Originated	15	18	19	14	7	1	3	1	78
	Application Denied	24	17	7	5	2	1	1	0	57
	Denial Rate	61.5%	48.6%	26.9%	26.3%	22.2%	50.0%	25.0%	.0%	42.2%
Total	Loan Originated	961	1,035	976	584	397	349	273	245	4,820
	Application Denied	307	351	312	202	89	55	56	45	1,417
	Denial Rate	24.2%	25.3%	24.2%	25.7%	18.3%	13.6%	17.0%	15.5%	22.7%

Table 37.C.14
Loan Applications by Income and Race/Ethnicity of Applicant: Originated and Denied

37. City of Canton
 2004–2011 HMDA Data

Race		<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	> \$75K	Data Missing	Total
American Indian	Loan Originated	0	1	4	2	1	1	0	9
	Application Denied	0	4	4	1	0	2	0	11
	Denial Rate	%	80.0%	50.0%	33.3%	.0%	66.7%	%	55.0%
Asian	Loan Originated	1	5	3	2	0	4	1	16
	Application Denied	0	3	0	0	0	0	1	4
	Denial Rate	.0%	37.5%	.0%	.0%	%	.0%	50.0%	20.0%
Black	Loan Originated	16	202	146	71	26	26	6	493
	Application Denied	18	125	64	29	12	8	9	265
	Denial Rate	52.9%	38.2%	30.5%	29.0%	31.6%	23.5%	60.0%	35.0%
White	Loan Originated	90	1,307	1,266	677	302	329	66	4,037
	Application Denied	74	361	253	102	39	50	25	904
	Denial Rate	45.1%	21.6%	16.7%	13.1%	11.4%	13.2%	27.5%	18.3%
Not Available	Loan Originated	9	88	85	34	16	24	4	260
	Application Denied	8	83	61	28	19	11	22	232
	Denial Rate	47.1%	48.5%	41.8%	45.2%	54.3%	31.4%	84.6%	47.2%
Not Applicable	Loan Originated	0	1	0	2	0	1	1	5
	Application Denied	0	1	0	0	0	0	0	1
	Denial Rate	%	50.0%	%	.0%	%	.0%	.0%	16.7%
Total	Loan Originated	116	1,604	1,504	788	345	385	78	4,820
	Application Denied	100	577	382	160	70	71	57	1,417
	Denial Rate	46.3%	26.5%	20.3%	16.9%	16.9%	15.6%	42.2%	22.7%
Non-Hispanic Ethnicity	Loan Originated	104	1,461	1,391	737	323	342	65	4,423
	Application Denied	84	460	311	127	48	54	32	1,116
	Denial Rate	44.7%	23.9%	18.3%	14.7%	12.9%	13.6%	33.0%	20.1%
Hispanic (Ethnicity)	Loan Originated	1	31	20	3	3	4	3	65
	Application Denied	5	17	5	2	0	5	4	38
	Denial Rate	83.3%	35.4%	20.0%	40.0%	.0%	55.6%	57.1%	36.9%

PREDATORY LENDING

Table 37.C.15
Originated Owner-Occupied Loans by HAL Status

37. City of Canton
 2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Other	739	576	597	454	304	300	271	245	3,486
HAL	222	459	379	130	93	49	2	0	1,334
Total	961	1,035	976	584	397	349	273	245	4,820
Percent HAL	23.1%	44.3%	38.8%	22.3%	23.4%	14.0%	.7%	.0%	27.7%

Table 37.C.16
Loans by Loan Purpose by HAL Status

37. City of Canton
 2004–2011 HMDA Data

Loan Purpose		2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	Other	739	576	597	454	304	300	271	245	3,486
	HAL	222	459	379	130	93	49	2	0	1,334
	Percent HAL	23.1%	44.3%	38.8%	22.3%	23.4%	14.0%	.7%	.0%	27.7%
Home Improvement	Other	103	97	133	108	142	92	80	65	820
	HAL	72	52	76	66	41	17	12	12	348
	Percent HAL	41.1%	34.9%	36.4%	37.9%	22.4%	15.6%	13.0%	15.6%	29.8%
Refinancing	Other	1,019	697	587	403	270	413	412	345	4,146
	HAL	496	664	564	233	131	91	11	11	2,201
	Percent HAL	32.7%	48.8%	49.0%	36.6%	32.7%	18.1%	2.6%	3.1%	34.7%
Total	Other	1,861	1,370	1,317	965	716	805	763	655	8,452
	HAL	790	1,175	1,019	429	93	49	2	0	3,883
	Percent HAL	29.8%	46.2%	43.6%	30.8%	27.0%	16.3%	3.2%	3.4%	31.5%

Table 37.C.17
HALs Originated by Race of Borrower

37. City of Canton
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	0	2	0	0	1	0	0	0	3
Asian	1	0	1	0	0	1	0	0	3
Black	30	83	63	27	6	5	0	0	214
White	158	319	280	100	78	43	2	0	980
Not Available	32	55	35	3	8	0	0	0	133
Not Applicable	1	0	0	0	0	0	0	0	1
Total	222	459	379	130	93	49	2	0	1,334
Hispanic (Ethnicity)	3	10	7	1	0	1	0	0	22

Table 37.C.18
Rate of HALs Originated by Race/Ethnicity of Borrower

37. City of Canton
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	.0%	50.0%	%	.0%	50.0%	%	%	%	33.3%
Asian	16.7%	.0%	50.0%	.0%	%	100.0%	.0%	%	18.8%
Black	35.3%	61.9%	55.8%	39.1%	18.8%	26.3%	.0%	.0%	43.4%
White	19.5%	39.1%	34.8%	20.3%	23.0%	13.4%	.8%	.0%	24.3%
Not Available	58.2%	67.9%	62.5%	18.8%	33.3%	.0%	.0%	.0%	51.2%
Not Applicable	25.0%	%	%	.0%	%	%	%	%	20%
Average	23.1%	44.3%	38.8%	22.3%	23.4%	14.0%	0.7%	0.0%	27.7%
Non-Hispanic Ethnicity	21.8%	42.0%	37.2%	22.4%	22.8%	14.2%	.8%	%	%
Hispanic (Ethnicity)	17.6%	62.5%	46.7%	12.5%	.0%	33.3%	.0%	.0%	33.8%

Table 37.C.19
Loans by HAL Status by Race/Ethnicity of Borrower
 37. City of Canton
 2004–2011 HMDA Data

Race	Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Other	2	2	0	1	1	0	0	0	6
	HAL	0	2	0	0	1	0	0	0	3
	Percent HAL	.0%	50.0%	%	.0%	50.0%	%	%	%	33.3%
Asian	Other	5	1	1	5	0	0	1	0	13
	HAL	1	0	1	0	0	1	0	0	3
	Percent HAL	16.7%	.0%	50.0%	.0%	%	100.0%	.0%	%	18.8%
Black	Other	55	51	50	42	26	14	21	20	279
	HAL	30	83	63	27	6	5	0	0	214
	Percent HAL	35.3%	61.9%	55.8%	39.1%	18.8%	26.3%	.0%	.0%	43.4%
White	Other	651	496	525	392	261	278	237	217	3,057
	HAL	158	319	280	100	78	43	2	0	980
	Percent HAL	19.5%	39.1%	34.8%	20.3%	23.0%	13.4%	0.8%	0.0%	24.3%
Not Available	Other	23	26	21	13	16	8	12	8	127
	HAL	32	55	35	3	8	0	0	0	133
	Percent HAL	58.2%	67.9%	62.5%	18.8%	33.3%	.0%	.0%	.0%	51.2%
Not Applicable	Other	3	0	0	1	0	0	0	0	4
	HAL	1	0	0	0	0	0	0	0	1
	Percent HAL	25.0%	%	%	.0%	%	%	%	%	20.0%
Total	Other	739	576	597	454	304	300	271	245	3,486
	HAL	222	459	379	130	93	49	2	0	1,334
	Percent HAL	23.1%	44.3%	38.8%	22.3%	23.4%	14.0%	.7%	.0%	27.7%
Non-Hispanic Ethnicity	Other	637	546	566	436	288	290	259	232	3,254
	HAL	178	395	335	126	85	48	2		
	Percent HAL	21.8%	42.0%	37.2%	22.4%	22.8%	14.2%	.8%	%	%
Hispanic (Ethnicity)	Other	14	6	8	7	1	2	1	4	43
	HAL	3	10	7	1	0	1	0	0	22
	Percent HAL	17.6%	62.5%	46.7%	12.5%	.0%	33.3%	.0%	.0%	33.8%

Table 37.C.20
Rates of HALs by Income of Borrower
 37. City of Canton
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Average
\$15,000 or Below	24.0%	51.7%	36.4%	50.0%	.0%	.0%	.0%	.0%	29.3%
\$15,001–\$30,000	26.1%	50.6%	47.6%	30.1%	27.8%	21.6%	.0%	.0%	33.1%
\$30,001–\$45,000	26.6%	45.6%	40.2%	17.0%	25.6%	8.4%	2.4%	.0%	28.5%
\$45,001–\$60,000	20.2%	41.3%	31.4%	18.8%	22.5%	17.2%	.0%	.0%	24.9%
\$60,001–\$75,000	10.7%	30.6%	32.1%	22.7%	26.7%	3.2%	.0%	.0%	20.3%
Above \$75,000	11.9%	25.0%	20.8%	7.5%	9.1%	10.0%	0.0%	.0%	13.5%
Data Missing	6.7%	44.4%	36.8%	42.9%	.0%	.0%	.0%	.0%	28.2%
Average	23.1%	44.3%	38.8%	22.3%	23.4%	14.0%	.7%	.0%	27.7%

Table 37.C.21
Loans by HAL Status by Income of Borrower
 37. City of Canton
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Other	19	14	14	5	8	9	10	3	82
	HAL	6	15	8	5	0	0	0	0	34
	Percent HAL	24.0%	51.7%	36.4%	50.0%	.0%	.0%	.0%	.0%	29.3%
\$15,001–\$30,000	Other	249	175	164	130	83	98	93	81	1,073
	HAL	88	179	149	56	32	27	0	0	531
	Percent HAL	26.1%	50.6%	47.6%	30.1%	27.8%	21.6%	.0%	.0%	33.1%
\$30,001–\$45,000	Other	221	179	186	146	99	87	81	76	1,075
	HAL	80	150	125	30	34	8	2	0	429
	Percent HAL	26.6%	45.6%	40.2%	17.0%	25.6%	8.4%	2.4%	.0%	28.5%
\$45,001–\$60,000	Other	134	98	105	82	55	48	39	31	592
	HAL	34	69	48	19	16	10	0	0	196
	Percent HAL	20.2%	41.3%	31.4%	18.8%	22.5%	17.2%	.0%	.0%	24.9%
\$60,001–\$75,000	Other	50	43	55	34	22	30	18	23	275
	HAL	6	19	26	10	8	1	0	0	70
	Percent HAL	10.7%	30.6%	32.1%	22.7%	26.7%	3.2%	.0%	.0%	20.3%
Above \$75,000	Other	52	57	61	49	30	27	27	30	333
	HAL	7	19	16	4	3	3	0	0	52
	Percent HAL	11.9%	25.0%	20.8%	7.5%	9.1%	10.0%	.0%	.0%	13.5%
Data Missing	Other	14	10	12	8	7	1	3	1	56
	HAL	1	8	7	6	0	0	0	0	22
	Percent HAL	6.7%	44.4%	36.8%	42.9%	.0%	.0%	.0%	.0%	28.2%
Total	Other	739	576	597	454	304	300	271	245	3,486
	HAL	222	459	379	130	93	49	2	0	1,334
	Percent HAL	23.1%	44.3%	38.8%	22.3%	23.4%	14.0%	.7%	.0%	27.7%

D. CRA DATA

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

Table 37.D.1
Small Business Loans Originated: \$100,000 or Less by Tract MFI
 37. City of Canton
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	217	346	304	96		963
2001	435	518	438	88		1,479
2002	303	477	434	105		1,319
2003	145	589	412	128		1,274
2004	135	618	367	138		1,258
2005	109	583	432	147		1,271
2006	139	752	603	173		1,667
2007	144	759	580	195		1,678
2008	106	585	450	135		1,276
2009	49	188	133	54		424
2010	43	249	142	49		483
2011	69	272	162	47		550
Total	1,894	5,936	4,457	1,355	0	13,642
Loan Amount (\$1,000s)						
2000	2,831	4,986	3,407	1,230		12,454
2001	5,948	5,912	4,568	902		17,330
2002	3,700	5,663	3,752	1,230		14,345
2003	2,095	6,103	4,019	1,124		13,341
2004	1,581	6,233	3,190	1,184		12,188
2005	2,211	6,549	3,925	1,324		14,009
2006	1,953	7,431	6,480	1,815		17,679
2007	1,909	8,121	5,371	2,265		17,666
2008	1,421	5,994	3,297	1,439		12,151
2009	1,188	2,820	1,431	629		6,068
2010	668	4,326	2,135	654		7,783
2011	1,199	4,790	2,103	725		8,817
Total	26,704	68,928	43,678	14,521	0	153,831

Table 37.D.2
Small Business Loans Originated: \$100,001 to \$250,000 by Tract MFI
 37. City of Canton
 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	31	6	3		56
2001	27	10	13	7		57
2002	23	12	14	3		52
2003	9	34	17	2		62
2004	9	35	4	2		50
2005	11	26	6	4		47
2006	7	23	6	3		39
2007	11	15	10	2		38
2008	5	18	6	3		32
2009	2	17	8	1		28
2010	2	18	5	2		27
2011	2	23	9	0		34
Total	124	262	104	32	0	522
Loan Amount (\$1,000s)						
2000	2,571	5,444	1,085	652		9,752
2001	4,660	1,678	2,064	1,071		9,473
2002	4,249	2,377	2,451	570		9,647
2003	1,405	5,749	2,733	280		10,167
2004	1,608	6,489	830	350		9,277
2005	2,036	4,930	1,064	684		8,714
2006	1,163	4,385	1,024	465		7,037
2007	1,990	2,767	1,608	352		6,717
2008	702	3,637	1,161	607		6,107
2009	469	3,082	1,588	248		5,387
2010	380	3,566	800	363		5,109
2011	433	4,266	1,842	0		6,541
Total	21,666	48,370	18,250	5,642	0	93,928

Table 37.D.3
Small Business Loans Originated: More than \$250,000 by Tract MFI
 37. City of Canton
 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	13	7	1		29
2001	14	17	11	2		44
2002	31	16	13	2		62
2003	10	23	6	3		42
2004	12	41	3	4		60
2005	14	29	7	4		54
2006	8	26	6	0		40
2007	5	24	7	0		36
2008	3	16	4	2		25
2009	3	15	4	2		24
2010	4	20	6	3		33
2011	6	21	4	5		36
Total	118	261	78	28	0	485
Loan Amount (\$1,000s)						
2000	4,210	5,065	3,854	500		13,629
2001	6,171	8,609	4,547	1,050		20,377
2002	14,991	7,420	6,129	800		29,340
2003	5,760	12,802	2,292	1,832		22,686
2004	6,906	21,627	1,200	1,731		31,464
2005	8,491	14,058	3,082	2,307		27,938
2006	4,303	12,848	2,966	0		20,117
2007	3,300	13,669	3,090	0		20,059
2008	2,300	9,377	2,125	1,442		15,244
2009	2,039	7,576	2,353	1,379		13,347
2010	2,550	10,656	2,694	1,556		17,456
2011	3,450	13,410	1,433	2,809		21,102
Total	64,471	137,117	35,765	15,406	0	252,759

Table 37.D.4
Small Business Loans to Businesses with Gross Annual Revenues of Less Than \$1 Million by Tract MFI
 37. City of Canton
 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	126	134	44		377
2001	150	162	154	40		506
2002	105	132	115	37		389
2003	47	184	141	38		410
2004	35	227	103	53		418
2005	49	232	184	76		541
2006	53	245	228	87		613
2007	42	246	203	84		575
2008	37	156	144	55		392
2009	20	66	48	15		149
2010	15	102	57	24		198
2011	23	111	71	22		227
Total	649	1,989	1,582	575	0	4,795
Loan Amount (\$1,000s)						
2000	2,324	6,479	4,219	2,078		15,100
2001	6,669	6,166	5,076	1,680		19,591
2002	6,700	6,204	5,332	1,165		19,401
2003	2,808	6,434	5,003	2,045		16,290
2004	1,312	10,223	2,900	1,969		16,404
2005	3,960	9,459	4,485	1,212		19,116
2006	1,755	7,537	5,115	1,470		15,877
2007	1,147	6,028	4,557	1,540		13,272
2008	1,290	2,608	3,760	2,302		9,960
2009	645	4,391	1,655	1,232		7,923
2010	449	6,907	2,651	1,761		11,768
2011	739	3,020	3,194	1,689		8,642
Total	29,798	75,456	47,947	20,143	0	173,344

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 37.E.1
Fair Housing Complaints by Basis
37. City of Canton
2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color				3	1		1			5
Disability	1	2	7	1	3	7	18	5	5	49
Family Status		2	1	5	2	5	7	4	1	27
National Origin							6			6
Race	6		4	8	3	4	17	4	5	51
Religion			1			1				2
Sex			2		2	2	2	1	1	10
Total Bases	7	4	15	17	11	19	51	14	12	150
Total Complaints	6	5	13	14	9	15	38	13	11	124

Table 37.E.2
Fair Housing Complaints by Issue
37. City of Canton
2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Discriminatory refusal to negotiate for rental				1	2			1		4
Discriminatory advertisement - rental								2		4
Discrimination in services and facilities relating to rental	1		1			1			1	4
Failure to provide accessible and usable public and common user areas		1	3							4
Discriminatory advertising, statements, and notices					1		1		1	3
False denial or representation of availability - rental					1	1		1		3
Steering				2			1			3
Otherwise deny or make housing available	1		1						1	3
Other discriminatory acts	1					1	1			3
Discrimination in terms, conditions or privileges relating to rental			2	1	2	4	15	1	2	27
Discriminatory terms, conditions, privileges, or services and facilities	1	1	2	3	4	3	7	3	2	26
Discriminatory refusal to rent		2	6	5	1	3	3	4		24
Discriminatory refusal to rent and negotiate for rental				3	1	3	12		2	21
Failure to provide an accessible route into and thru the covered unit			2							2
Failure to permit reasonable modification								1	1	2
Discriminatory acts under Section 818 (coercion, etc.)			1		1	3	9	2	2	18
Failure to make reasonable accommodation		1	1	1			8	2	3	16
Discriminatory refusal to sell							1			1
False denial or representation of availability - sale							1			1
Discrimination in making of loans								1		1
Discrimination in the terms or conditions for making loans									1	1
Discrimination in terms, conditions, privileges relating to sale	1									1
Restriction of choices relative to a sale	1									1
Total Issues	6	5	20	18	10	21	59	18	16	173
Total Complaints	6	5	13	14	9	15	38	13	11	124

Table 37.E.3
Fair Housing Complaints by Closure Status
 37. City of Canton
 2004–2012 HUD Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Administrative Closure Cause (FHAP)	2		1	2	3	3	4		1	16
Conciliated / Settled		3	3	5	2	2	17	5	3	40
No Cause	4	2	6	5	4	5	13	2		41
Open							1	2	7	10
Total Complaints	6	5	13	14	9	15	38	13	11	124

HUD Complaints Found With Cause

Table 37.E.4
Fair Housing Complaints Found With Cause by Basis
 37. City of Canton
 2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color				2			1			3
Disability		2	4		1	1	16	5		29
Family Status	1	1	1	4	1	4	1	3	1	16
National Origin							1			1
Race			1	3		1	3	1	2	11
Religion						1				1
Sex						2	2	1		5
Total Bases	3	6	9	2	9	24	10	3	66	
Total Complaints	3	6	7	2	7	20	9	3	57	

Table 37.E.5
Fair Housing Complaints Found With Cause by Issue
 37. City of Canton
 2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Discriminatory acts under Section 818 (coercion, etc.)					1	1	3	1	1	7
Discriminatory refusal to negotiate for rental					2			1		3
False denial or representation of availability - rental					1	1		1		3
Steering					2		1			3
Failure to provide accessible and usable public and common user areas		1	2							3
Discriminatory advertisement - rental						1		1		2
Failure to provide an accessible route into and thru the covered unit			2							2
Discriminatory refusal to rent and negotiate for rental				3		2	11			16
Discriminatory refusal to rent		1	1	3	1	2	2	3		13
Discrimination in terms, conditions or privileges relating to rental			1			1	8	1	1	12
Discriminatory terms, conditions, privileges, or services and facilities			2			2	3	2	2	11
Failure to make reasonable accommodation		1					8	2		11
Discriminatory advertising, statements, and notices							1			1
Discrimination in services and facilities relating to rental						1				1
Other discriminatory acts						1				1
Failure to permit reasonable modification								1		1
Total Issues	0	3	8	11	2	12	37	13	4	90
Total Complaints		3	6	7	2	7	20	9	3	57

OHIO CIVIL RIGHTS COMMISSION COMPLAINTS

Table 37.E.6
Fair Housing Complaints by Basis
 37. City of Canton
 2004–2012 OCRC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color	3		1		1	1	7		1	14
Disability	2	1	12	3	4	8	11	1		42
Family Status	1			6	1	2	1	1		12
Gender			1			2		2	1	6
National Origin			1		1		1	3		6
Race	5		4	9	4	7	7	5	3	39
Religion			1		1		1			3
Retaliation		1	2	1	2	1	1	2		10
Other			1							1
Total Bases	11	2	23	19	12	18	29	14	5	133
Total Complaints	8	2	14	16	7	14	20	7	3	91

Table 37.E.7
Fair Housing Complaints by Issue
 37. City of Canton
 2004–2012 OCRC Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Advertising									1	1
Exclusion	1									1
Harassment							4			4
Intimidation			2	2	3		7	2	1	17
Other	6	1	4	1		2	2	3	3	22
Reasonable Accommodation		1	3			1	6	1		12
Terms and Conditions	3		10	16	7	11	16	4	1	68
Total Issues	10	2	19	19	10	14	35	10	6	125
Total Complaints	8	2	14	16	7	14	20	7	3	91

Table 37.E.8
Fair Housing Complaints by Closure Status
 37. City of Canton
 2004–2012 OCRC Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Administrative Closure					3	5				8
CP Failed to Cooperate				1			1		1	3
CP Withdrawal – No Benefit	2						2			4
Failure to Locate Charging Party			1							1
No Cause Finding Issued	5	1	3	6	3	3	9	4		34
No Jurisdiction								2		2
Settlement With Benefits	1		8	1		3	6		1	20
Successful Conciliation			2			2	2	1		7
Withdrawal With Benefits		1		8	1	1			1	12
Total Complaints	8	2	14	16	7	14	20	7	3	91

FAIR HOUSING CONTACT SERVICE COMPLAINTS

Table 37.E.9
Fair Housing Complaints by Basis
 37. City of Canton
 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					2		6	3	1	12
Familial Status				2	2	2		3		9
National Origin			1		1					2
Race			1		3					4
Total Bases	0	0	3	2	8	2	6	6	3	30
Total Complaints			1	2	7	2	6	6	2	26

Table 37.E.10
Fair Housing Complaints by Closure Status
 37. City of Canton
 2004–2012 FHCS Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Closed				1	2		1			4
Elected not to pursue									1	1
Inquiry					1				1	2
No contact								2		2
No probable cause				1	2					3
Probable cause						2	2	3		7
Settled			1				3	1		5
Settled through OCRC					1					1
Withdrawal of Charge					1					1
Total Complaints	0	0	1	2	7	2	6	6	2	26

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 37.F.1
Primary Role of Respondent
 37. City of Canton
 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	1
Other Role	1
Total	6

FEDERAL, STATE, AND LOCAL LAWS

Table 37.F.2
Familiarity with Fair Housing Laws

37. City of Canton
2012–2013 Fair Housing Survey
for Housing Stakeholders Data

Familiarity	Total
Not Familiar	1
Somewhat Familiar	1
Very Familiar	3
Missing	1
Total	6

Table 37.F.3
Perceptions About Fair Housing Laws

37. City of Canton
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	6
Are fair housing laws difficult to understand or follow?	2	3		1	6
Do you think fair housing laws should be changed?	2	2	1	1	6
Do you think fair housing laws are adequately enforced?	5			1	6

Table 37.F.4
Fair Housing Activities

37. City of Canton
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			1	6
Have you participated in fair housing training?		5			1	6
Are you aware of any fair housing testing?		3	1	1	1	6
Testing and education	Too Little	Right Amount	Too Much	Don't Know	Missing	Total
Is there sufficient outreach and education activity?	4	1			1	6
Is there sufficient testing?	3	1		1	1	6

Table 37.F.5
Protected Classes

37. City of Canton
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 37.F.6
Fair Housing Violation Referrals
 37. City of Canton
 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 37.F.7
Local Fair Housing
 37. City of Canton
 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	6
Are there any specific geographic areas that have fair housing problems?	3	1	1	1	6
Are there any specific groups in that face housing discrimination?	3		2	1	6

FAIR HOUSING IN THE PRIVATE SECTOR

Table 37.F.8
Barriers to Fair Housing in the Private Sector
 37. City of Canton
 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	1	6
The real estate industry?	1	1	3	1	6
The mortgage and home lending industry?	1	1	3	1	6
The housing construction or accessible housing design fields?		2	3	1	6
The home insurance industry?		1	4	1	6
The home appraisal industry?	1	1	3	1	6
Any other housing services?		1	4	1	6

FAIR HOUSING IN THE PUBLIC SECTOR

Table 37.F.9

Barriers to Fair Housing in the Public Sector

37. City of Canton

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	1	6
Zoning laws?	1	2	2	1	6
Occupancy standards or health and safety codes?		2	3	1	6
Property tax policies?		2	3	1	6
Permitting process?		2	3	1	6
Housing construction standards?		2	3	1	6
Neighborhood or community development policies?		2	3	1	6
Limited access to government services, such as employment services?	2	2	1	1	6
Public administrative actions or regulations?		1	4	1	6

NARRATIVE COMMENTS

Federal, State, and Local Laws

Table 37.F.10

How did you become aware of fair housing laws?

37. City of Canton

2013 Fair Housing Survey Data

Comments:
I have taken trainings and read in this area.

Table 37.F.11

How should fair housing laws be changed?

37. City of Canton

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 37.F.12

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

37. City of Canton

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 37.F.13

Are there any specific groups in that face housing discrimination?

37. City of Canton

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 37.F.14**Please share any additional comments.**37. City of Canton
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 37.F.15****Are you aware of any questionable practices or barriers to fair housing choice in the rental housing market?**37. City of Canton
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 37.F.16**Are you aware of any questionable practices or barriers to fair housing choice in the real estate industry?**37. City of Canton
2013 Fair Housing Survey Data

Comments:
I know some minorities who do not feel welcomed to live in certain parts of the county.

Table 37.F.17**Are you aware of any questionable practices or barriers to fair housing choice in the mortgage and home lending industry?**37. City of Canton
2013 Fair Housing Survey Data

Comments:
More minorities are denied loans for mortgages.

Table 37.F.18**Are you aware of any questionable practices or barriers to fair housing choice in the home appraisal industry?**37. City of Canton
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 37.F.19****Are you aware of any questionable practices or barriers to fair housing choice in zoning laws?**37. City of Canton
2013 Fair Housing Survey Data

Comments:
Problems with group homes in residential communities.

Table 37.F.20

Are you aware of any barriers that limit access to government services, such as a lack of transportation or employment services?

37. City of Canton
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.

G. LAND USE PLANNING SURVEY DATA

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. While multiple attempts were made to contact the prospective survey respondents in each community, or the Progress Review Team member for communities where no names were received, in the City of Canton, no planning or development staff responded to complete the interview.

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 Canton. 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 Canton.

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 Canton.

Results of the Fair Housing Surveys indicate that Canton does not have sufficient policies or practices that completely address the duty to affirmatively further fair housing.

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 City of Canton. 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 the City of Canton.

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 37.H.1
Impediments Matrix
 37. City of Canton
 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 ⁵¹		
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	Lack of inclusionary policies							X		X	All	M

⁵¹ 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.

38. CITY OF MASSILLON

A. CENSUS BUREAU DATA

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

Table 38.A.1

Population by Age

38. City of Massillon

2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Under 5	2,058	6.6%	2,051	6.4%	-.3%
5 to 19	6,612	21.1%	6,180	19.2%	-6.5%
20 to 24	1,739	5.6%	1,775	5.5%	2.1%
25 to 34	4,099	13.1%	4,097	12.7%	.0%
35 to 54	8,806	28.1%	8,632	26.8%	-2.0%
55 to 64	2,960	9.4%	4,031	12.5%	36.2%
65 or Older	5,051	16.1%	5,383	16.7%	6.6%
Total	31,325	100.0%	32,149	100.0%	2.6%

Table 38.A.2

Elderly Population by Age

38. City of Massillon

2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
65 to 66	479	9.5%	653	12.1%	36.3%
67 to 69	796	15.8%	809	15.0%	1.6%
70 to 74	1,302	25.8%	1,169	21.7%	-10.2%
75 to 79	1,087	21.5%	994	18.5%	-8.6%
80 to 84	774	15.3%	900	16.7%	16.3%
85 or Older	613	12.1%	858	15.9%	40.0%
Total	5,051	100.0%	5,383	100.0%	6.6%

Table 38.A.3

Population by Race and Ethnicity

38. City of Massillon

2000 & 2010 Census SF1 Data

Race	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
White	27,622	88.2%	28,094	87.4%	1.7%
Black	2,942	9.4%	2,822	8.8%	-4.1%
American Indian	71	.2%	95	.3%	33.8%
Asian	79	.3%	128	.4%	62.0%
Native Hawaiian/ Pacific Islander	1	.0%	7	.0%	600.0%
Other	108	.3%	169	.5%	56.5%
Two or More Races	502	1.6%	834	2.6%	66.1%
Total	31,325	100.0%	32,149	100.0%	2.6%
Non-Hispanic	31,024	99.0	31,498	98.0%	1.5%
Hispanic	301	1.0%	651	2.0%	116.3%

Table 38.A.4
Disability by Age
 38. City of Massillon
 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	237	9.1%	120	5.5%	357	7.5%
18 to 34	345	10.0%	334	10.3%	679	10.1%
35 to 64	907	14.8%	1,088	16.9%	1,995	15.9%
65 to 74	365	34.0%	255	20.1%	620	26.5%
75 or Older	405	45.7%	896	49.7%	1,301	48.4%
Total	2,259	14.8%	2,693	17.1%	4,952	16.0%

Table 38.A.5
Employment Status by Disability and Type: Age 18 to 64
 38. City of Massillon
 2010 Three-Year ACS Data

Disability Status	Population
Employed:	13,003
With a disability:	734
With a hearing difficulty	169
With a vision difficulty	198
With a cognitive difficulty	320
With an ambulatory difficulty	70
With a self-care difficulty	14
With an independent living difficulty	199
No disability	12,269
Unemployed:	1,704
With a disability:	350
With a hearing difficulty	17
With a vision difficulty	55
With a cognitive difficulty	195
With an ambulatory difficulty	167
With a self-care difficulty	0
With an independent living difficulty	61
No disability	1,354
Not in labor force:	4,573
With a disability:	1,590
With a hearing difficulty	316
With a vision difficulty	350
With a cognitive difficulty	1,076
With an ambulatory difficulty	955
With a self-care difficulty	515
With an independent living difficulty	876
No disability	2,983
Total	19,280

Table 38.A.6
Households by Income

38. City of Massillon
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	2,408	18.9%	2,196	16.7%
\$15,000 to \$19,999	1,011	7.9%	902	6.9%
\$20,000 to \$24,999	1,068	8.4%	1,170	8.9%
\$25,000 to \$34,999	2,221	17.5%	1,788	13.6%
\$35,000 to \$49,999	2,198	17.3%	2,315	17.6%
\$50,000 to \$74,999	2,314	18.2%	2,370	18.0%
\$75,000 to \$99,999	849	6.7%	1,394	10.6%
\$100,000 or More	651	5.1%	1,032	7.8%
Total	12,720	100.0%	13,167	100.0%

Table 38.A.7
Poverty by Age

38. City of Massillon
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	524	16.1%	517	11.4%
6 to 17	667	20.5%	767	16.9%
18 to 64	1,699	52.3%	2,877	63.4%
65 or Older	359	11.0%	377	8.3%
Total	3,249	100.0%	4,538	100.0%
Poverty Rate	10.7%	.	14.7%	.

Table 38.A.8
Households by Year Home Built

38. City of Massillon
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	4,757	37.6%	4,582	34.8%
1940 to 1949	1,379	10.9%	1,271	9.7%
1950 to 1959	2,057	16.3%	2,062	15.7%
1960 to 1969	1,541	12.2%	1,467	11.1%
1970 to 1979	1,436	11.4%	881	6.7%
1980 to 1989	530	4.2%	741	5.6%
1990 to 1999	944	7.5%	1,223	9.3%
2000 to 2004	.	.	729	5.5%
2005 or Later	.	.	211	1.6%
Total	12,644	100.0%	13,167	100.0%

Table 38.A.9**Housing Units by Type**

38. City of Massillon

2000 Census SF3 & 2010 Five-Year ACS Data

Unit Type	2000 Census		2010 Five-Year ACS	
	Units	% of Total	Units	% of Total
Single-Family	10,281	75.9%	11,902	81.1%
Duplex	1,047	7.7%	819	5.6%
Tri- or Four-Plex	634	4.7%	470	3.2%
Apartment	1,202	8.9%	1,178	8.0%
Mobile Home	375	2.8%	299	2.0%
Boat, RV, Van, Etc.	0	.0%	0	.0%
Total	13,539	100.0%	14,668	100.0%

Table 38.A.10**Housing Units by Tenure**

38. City of Massillon

2000 & 2010 Census SF1 Data

Tenure	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
Occupied Housing Units	12,677	93.4%	13,140	90.6%	3.7%
Owner-Occupied	8,743	69.0%	8,742	66.5%	.0%
Renter-Occupied	3,934	31.0%	4,398	33.5%	11.8%
Vacant Housing Units	890	6.6%	1,357	9.4%	52.5%
Total Housing Units	13,567	100.0%	14,497	100.0%	6.9%

Table 38.A.11**Disposition of Vacant Housing Units**

38. City of Massillon

2000 & 2010 Census SF1 Data

Disposition	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
For Rent	303	34.0%	512	37.7%	69.0%
For Sale	156	17.5%	270	19.9%	73.1%
Rented or Sold, Not Occupied	98	11.0%	82	6.0%	-16.3%
For Seasonal, Recreational, or Occasional Use	28	3.1%	48	3.5%	71.4%
For Migrant Workers	0	0.0%	1	.1%	%
Other Vacant	305	34.3%	444	32.7%	45.6%
Total	890	100.0%	1,357	100.0%	52.5%

Table 38.A.12**Households by Household Size**

38. City of Massillon

2000 & 2010 Census SF1 Data

Size	2000 Census		2010 Census		% Change 00-10
	Households	% of Total	Households	% of Total	
One Person	3,756	29.6%	4,091	31.1%	8.9%
Two Persons	4,243	33.5%	4,358	33.2%	2.7%
Three Persons	1,990	15.7%	2,059	15.7%	3.5%
Four Persons	1,667	13.1%	1,582	12.0%	-5.1%
Five Persons	709	5.6%	660	5.0%	-6.9%
Six Persons	204	1.6%	248	1.9%	21.6%
Seven Persons or More	108	.9%	142	1.1%	31.5%
Total	12,677	100.0%	13,140	100.0%	3.7%

Table 38.A.13
Household Type by Tenure
 38. City of Massillon
 2000 & 2010 Census SF1 Data

Household Type	2000 Census		2010 Census		% Change 00–10
	Households	% of Total	Households	% of Total	
Family Households	8,324	65.7%	8,268	62.9%	-.7%
Married-Couple Family	6,056	72.8%	5,637	68.2%	-6.9%
Owner-Occupied	5,127	84.7%	4,783	84.9%	-6.7%
Renter-Occupied	929	15.3%	854	15.1%	-8.1%
Other Family	2,268	27.2%	2,631	31.8%	16.0%
Male Householder, No Spouse	518	22.8%	674	25.6%	30.1%
Owner-Occupied	317	61.2%	353	52.4%	11.4%
Renter-Occupied	201	38.8%	321	47.6%	59.7%
Female Householder, No Spouse	1,750	77.2%	1,957	74.4%	11.8%
Owner-Occupied	888	50.7%	914	46.7%	2.9%
Renter-Occupied	862	49.3%	1,043	53.3%	21.0%
Non-Family Households	4,353	34.3%	4,872	37.1%	11.9%
Owner-Occupied	2,411	55.4%	2,692	55.3%	11.7%
Renter-Occupied	1,942	44.6%	2,180	44.7%	12.3%
Total	12,677	100.0%	13,140	100.0%	3.7%

Table 38.A.14
Group Quarters Population
 38. City of Massillon
 2000 & 2010 Census SF1 Data

Group Quarters Type	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Institutionalized					
Correctional Institutions	0	.0%	0	.0%	%
Juvenile Facilities	.	.	233	34.1%	.
Nursing Homes	284	40.7%	348	51.0%	22.5%
Other Institutions	413	59.3%	102	14.9%	-75.3%
Total	697	100.0%	683	100.0%	-2.0%
Noninstitutionalized					
College Dormitories	6	3.8%	21	7.8%	250.0%
Military Quarters	0	.0%	0	.0%	%
Other Noninstitutional	150	96.2%	247	92.2%	64.7%
Total	156	18.3%	268	28.2%	71.8%
Total Group Quarters Population	853	100.0%	951	100.0%	11.5%

Table 38.A.15
Overcrowding and Severe Overcrowding
 38. City of Massillon
 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	8,603	99.2%	59	.7%	7	.1%	8,669
2010 ACS	8,964	99.7%	18	.2%	12	.1%	8,994
Renter							
2000 Census	3,903	98.2%	46	1.2%	26	.7%	3,975
2010 ACS	4,155	99.6%	18	.4%	0	.0%	4,173
Total							
2000 Census	12,506	98.9%	105	.8%	33	.3%	12,644
2010 ACS	13,119	99.6%	36	.3%	12	.1%	13,167

Table 38.A.16
Households with Incomplete Plumbing Facilities
 38. City of Massillon
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Plumbing Facilities	12,569	13,132
Lacking Complete Plumbing Facilities	75	35
Total Households	12,644	13,167
Percent Lacking	.6%	.3%

Table 38.A.17
Households with Incomplete Kitchen Facilities
 38. City of Massillon
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Kitchen Facilities	12,596	13,132
Lacking Complete Kitchen Facilities	48	35
Total Households	12,644	13,167
Percent Lacking	.4%	.3%

Table 38.A.18
Cost Burden and Severe Cost Burden by Tenure
 38. City of Massillon
 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	3,967	74.7%	899	16.9%	439	8.3%	5	.1%	5,310
2010 ACS	4,097	67.5%	1,265	20.8%	678	11.2%	34	.6%	6,074
Owner Without a Mortgage									
2000 Census	2,432	90.2%	173	6.4%	41	1.5%	51	1.9%	2,697
2010 ACS	2,408	82.5%	349	12.0%	116	4.0%	47	1.6%	2,920
Renter									
2000 Census	2,297	57.9%	851	21.4%	503	12.7%	317	8.0%	3,968
2010 ACS	1,845	44.2%	1,013	24.3%	1,041	24.9%	274	6.6%	4,173
Total									
2000 Census	8,696	72.6%	1,923	16.1%	983	8.2%	373	3.1%	11,975
2010 ACS	8,350	63.4%	2,627	20.0%	1,835	13.9%	355	2.7%	13,167

Table 38.A.19
Median Housing Costs
 38. City of Massillon
 2000 Census SF3 & 2010 Five-Year ACS Data

Housing Cost	2000 Census	2010 ACS
Median Contract Rent	\$356	\$452
Median Home Value	\$82,500	\$98,900

B. BLS DATA

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

Table 38.B.1
Labor Force Statistics
 38. City of Massillon
 1990–2011 BLS Data

Year	Labor Force	Employment	Unemployment	Unemployment Rate	Statewide Unemployment Rate
1990	14,192	13,084	1,108	7.8%	5.7%
1991	14,378	13,106	1,272	8.8%	6.6%
1992	14,502	13,087	1,415	9.8%	7.4%
1993	14,369	13,081	1,288	9.0%	6.7%
1994	14,320	13,246	1,074	7.5%	5.6%
1995	14,352	13,449	903	6.3%	4.9%
1996	14,583	13,581	1,002	6.9%	5.0%
1997	14,553	13,655	898	6.2%	4.6%
1998	14,519	13,746	773	5.3%	4.3%
1999	14,445	13,622	823	5.7%	4.3%
2000	15,730	15,065	665	4.2%	4.0%
2001	15,781	15,083	698	4.4%	4.4%
2002	15,682	14,741	941	6.0%	5.7%
2003	15,736	14,545	1,191	7.6%	6.2%
2004	15,641	14,544	1,097	7.0%	6.1%
2005	15,650	14,636	1,014	6.5%	5.9%
2006	15,685	14,774	911	5.8%	5.4%
2007	15,911	14,940	971	6.1%	5.6%
2008	16,047	14,929	1,118	7.0%	6.5%
2009	16,154	14,258	1,896	11.7%	10.1%
2010	15,701	13,918	1,783	11.4%	10.0%
2011	15,603	14,075	1,528	9.8%	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.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 38.C.1
Purpose of Loan by Year
38. City of Massillon
2004–2011 HMDA Data

Purpose	2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	810	947	957	593	386	372	338	295	4,698
Home Improvement	247	287	304	280	128	96	67	70	1,479
Refinancing	2,072	1,987	1,666	1,253	773	748	655	509	9,663
Total	3,129	3,221	2,927	2,126	1,287	1,216	1,060	874	15,840

Table 38.C.2
Occupancy Status for Home Purchase Loan Applications
38. City of Massillon
2004–2011 HMDA Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	Total
Owner-Occupied	729	843	851	511	352	352	324	277	4,239
Not Owner-Occupied	72	97	106	74	34	20	14	18	435
Not Applicable	9	7	0	8	0	0	0	0	24
Total	810	947	957	593	386	372	338	295	4,698

Table 38.C.3
Owner-Occupied Home Purchase Loan Applications by Loan Type
38. City of Massillon
2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Conventional	620	733	747	426	147	81	74	84	2,912
FHA - Insured	91	94	91	75	192	263	244	177	1,227
VA - Guaranteed	18	16	13	10	13	8	6	16	100
Rural Housing Service or Farm Service Agency	0	0	0	0	0	0	0	0	0
Total	729	843	851	511	352	352	324	277	4,239

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 38.C.4
Loan Applications by Action Taken
 38. City of Massillon
 2004–2011 HMDA Data

Action	2004	2005	2006	2007	2008	2009	2010	2011	Total
Loan Originated	391	464	434	293	182	185	152	133	2,234
Application Approved but not Accepted	51	41	44	18	8	12	10	5	189
Application Denied	99	120	111	66	37	30	39	18	520
Application Withdrawn by Applicant	33	49	43	25	16	14	7	7	194
File Closed for Incompleteness	16	11	12	11	8	3	3	3	67
Loan Purchased by the Institution	139	156	207	98	101	108	113	111	1,033
Preapproval Request Denied	0	2	0	0	0	0	0	0	2
Preapproval Approved but not Accepted	0	0	0	0	0	0	0	0	0
Total	729	843	851	511	352	352	324	277	4,239
Denial Rate	20.2%	20.5%	20.4%	18.4%	16.9%	14.0%	20.4%	11.9%	18.9%

Table 38.C.5
Denial Rates by Gender of Applicant
 38. City of Massillon
 2004–2011 HMDA Data

Year	Male	Female	Not Available	Not Applicable	Average
2004	17.6%	20.5%	68.8%	%	20.2%
2005	17.4%	25.4%	33.3%	%	20.5%
2006	17.8%	20.5%	51.7%	%	20.4%
2007	18.0%	16.1%	62.5%	%	18.4%
2008	16.8%	14.5%	33.3%	%	16.9%
2009	16.5%	10.0%	.0%	%	14.0%
2010	17.2%	27.9%	14.3%	%	20.4%
2011	14.3%	9.4%	7.1%	%	11.9%
Average	17.3%	19.6%	37.6%	%	18.9%

Table 38.C.6
Loan Applications by Selected Action Taken by Gender of Applicant
 38. City of Massillon
 2004–2011 HMDA Data

Gender		2004	2005	2006	2007	2008	2009	2010	2011	Total
Male	Originated	258	309	300	196	129	116	96	72	1,476
	Denied	55	65	65	43	26	23	20	12	309
	Denial Rate	17.6%	17.4%	17.8%	18.0%	16.8%	16.5%	17.2%	14.3%	17.3%
Female	Originated	128	141	120	94	47	63	44	48	685
	Denied	33	48	31	18	8	7	17	5	167
	Denial Rate	20.5%	25.4%	20.5%	16.1%	14.5%	10.0%	27.9%	9.4%	19.6%
Not Available	Originated	5	14	14	3	6	6	12	13	73
	Denied	11	7	15	5	3	0	2	1	44
	Denial Rate	68.8%	33.3%	51.7%	62.5%	33.3%	.0%	14.3%	7.1%	37.6%
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	391	464	434	293	182	185	152	133	2,234
	Denied	99	120	111	66	37	30	39	18	520
	Denial Rate	20.2%	20.5%	20.4%	18.4%	16.9%	14.0%	20.4%	11.9%	18.9%

Table 38.C.7
Denial Rates by Race/Ethnicity of Applicant
 38. City of Massillon
 2004–2011 HMDA Data

Race/Ethnicity	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	%	100.0%	.0%	%	%	%	%	.0%	33.3%
Asian	.0%	.0%	.0%	.0%	.0%	.0%	.0%	%	.0%
Black	22.6%	25.7%	43.3%	55.6%	33.3%	25.0%	40.0%	.0%	33.6%
White	18.2%	19.0%	16.5%	15.0%	15.0%	13.9%	20.4%	11.5%	16.8%
Not Available	52.0%	32.6%	50.0%	53.8%	30.8%	14.3%	16.7%	17.6%	36.9%
Not Applicable	%	%	%	%	%	0%	0%	%	%
Average	20.2%	20.5%	20.4%	18.4%	16.9%	14.0%	20.4%	11.9%	18.9%
Non-Hispanic	19.9%	19.4%	18.1%	17.4%	15.9%	13.3%	21.2%	11.2%	17.8%
Hispanic	.0%	50.0%	.0%	.0%	%	.0%	.0%	%	12.0%

Table 38.C.8
Loan Applications by Selected Action Taken by Race/Ethnicity of Applicant
 38. City of Massillon
 2004–2011 HMDA Data

Race		2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Originated	0	0	1	0	0	0	0	1	2
	Denied	0	1	0	0	0	0	0	0	1
	Denial Rate	%	100.0%	.0%	%	%	%	%	.0%	33.3%
Asian	Originated	1	1	2	2	1	3	1	0	11
	Denied	0	0	0	0	0	0	0	0	0
	Denial Rate	.0%	.0%	.0%	.0%	.0%	.0%	.0%	%	.0%
Black	Originated	24	26	17	8	8	3	3	2	91
	Denied	7	9	13	10	4	1	2	0	46
	Denial Rate	22.6%	25.7%	43.3%	55.6%	33.3%	25.0%	40.0%	.0%	33.6%
White	Originated	354	408	394	277	164	173	133	116	2,019
	Denied	79	96	78	49	29	28	34	15	408
	Denial Rate	18.2%	19.0%	16.5%	15.0%	15.0%	13.9%	20.4%	11.5%	16.8%
Not Available	Originated	12	29	20	6	9	6	15	14	111
	Denied	13	14	20	7	4	1	3	3	65
	Denial Rate	52.0%	32.6%	50.0%	53.8%	30.8%	14.3%	16.7%	17.6%	36.9%
Not Applicable	Originated	0	0	0	0	0	0	0	0	0
	Denied	0	0	0	0	0	0	0	0	0
	Denial Rate	52.0%	32.6%	50.0%	53.8%	30.8%	14.3%	16.7%	17.6%	%
Total	Originated	391	464	434	293	182	185	152	133	2,234
	Denied	99	120	111	66	37	30	39	18	520
	Denial Rate	20.2%	20.5%	20.4%	18.4%	16.9%	14.0%	20.4%	11.9%	18.9%
Non-Hispanic	Originated	343	429	408	284	174	176	134	119	2,067
	Denied	85	103	90	60	33	27	36	15	449
	Denial Rate	19.9%	19.4%	18.1%	17.4%	15.9%	13.3%	21.2%	11.2%	17.8%
Hispanic	Originated	7	3	5	2	0	2	3	0	22
	Denied	0	3	0	0	0	0	0	0	3
	Denial Rate	.0%	50.0%	.0%	.0%	%	.0%	.0%	%	12.0%

Table 38.C.9
Loan Applications by Reason for Denial
 38. City of Massillon
 2004–2011 HMDA Data

Denial Reason	2004	2005	2006	2007	2008	2009	2010	2011	Total
Debt-to-Income Ratio	9	9	11	5	8	2	8	1	53
Employment History	2	3	1	0	0	1	0	1	8
Credit History	18	20	27	16	8	6	9	6	110
Collateral	3	4	12	9	8	5	10	2	53
Insufficient Cash	3	2	4	5	0	1	0	0	15
Unverifiable Information	2	9	1	2	1	1	0	0	16
Credit Application Incomplete	7	12	0	8	2	1	3	4	37
Mortgage Insurance Denied	0	0	0	0	0	0	0	0	0
Other	26	24	19	6	1	7	4	1	88
Missing	29	37	36	15	9	6	5	3	140
Total	99	120	111	66	37	30	39	18	520

Table 38.C.10
Denial Rates by Income of Applicant
 38. City of Massillon
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	50.0%	60.0%	30.8%	40.0%	.0%	14.3%	57.1%	75.0%	43.1%
\$15,001–\$30,000	30.0%	27.0%	32.1%	25.7%	21.1%	18.6%	18.5%	5.9%	25.7%
\$30,001–\$45,000	19.2%	19.7%	16.9%	12.1%	21.4%	12.3%	28.3%	8.0%	17.2%
\$45,001–\$60,000	10.5%	14.7%	17.2%	17.9%	8.3%	14.3%	18.9%	13.0%	14.4%
\$60,001–\$75,000	6.7%	15.6%	9.8%	20.8%	17.4%	6.3%	11.1%	11.1%	11.9%
Above \$75,000	15.4%	8.9%	4.0%	16.3%	10.7%	5.6%	5.9%	10.7%	10.1%
Data Missing	58.3%	18.8%	25.0%	.0%	50.0%	25.0%	.0%	66.7%	33.3%
Total	20.2%	20.5%	20.4%	18.4%	16.9%	14.0%	20.4%	11.9%	18.9%

Table 38.C.11
Denial Rates of Loans by Race/Ethnicity and Income of Applicant
 38. City of Massillon
 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%	%	33.3%
Asian	%	%	.0%	.0%	.0%	.0%	.0%	.0%
Black	50.0%	37.0%	35.9%	33.3%	9.1%	27.3%	%	33.6%
White	44.0%	22.3%	16.2%	12.5%	9.0%	8.9%	33.3%	16.8%
Not Available	.0%	55.7%	21.4%	27.3%	57.1%	15.8%	40.0%	36.9%
Not Applicable	%	%	%	%	%	%	%	%
Average	43.1%	25.7%	17.2%	14.4%	11.9%	10.1%	33.3%	18.9%
Non-Hispanic Ethnicity	44.6%	23.2%	17.1%	14.2%	10.1%	9.1%	32.6%	17.8%
Hispanic (Ethnicity)	%	22.2%	.0%	.0%	50.0%	.0%	%	12.0%

Table 38.C.12
Loan Applications by Reason for Denial by Race/Ethnicity of Applicant
 38. City of Massillon
 2004–2011 HMDA Data

Denial Reason	American Indian	Asian	Black	White	Not Available	Not Applicable	Total	Hispanic (Ethnicity)
Debt-to-Income Ratio	0	0	3	48	2	0	53	0
Employment History	0	0	1	7	0	0	8	0
Credit History	0	0	15	85	10	0	110	0
Collateral	0	0	2	46	5	0	53	0
Insufficient Cash	0	0	2	12	1	0	15	0
Unverifiable Information	0	0	2	12	2	0	16	1
Credit Application Incomplete	1	0	3	28	5	0	37	0
Mortgage Insurance Denied	0	0	0	0	0	0	0	0
Other	0	0	6	69	13	0	88	1
Missing	0	0	12	101	27	0	140	1
Total	1	0	46	408	65	0	520	3
% Missing	.0%	%	26.1%	24.8%	41.5%	%	26.9%	33.3%

Table 38.C.13
Loan Applications by Income of Applicant: Originated and Denied
 38. City of Massillon
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Loan Originated	2	6	9	3	3	6	3	1	33
	Application Denied	2	9	4	2	0	1	4	3	25
	Denial Rate	50.0%	60.0%	30.8%	40.0%	.0%	14.3%	57.1%	75.0%	43.1%
\$15,001–\$30,000	Loan Originated	105	116	114	75	45	57	53	32	597
	Application Denied	45	43	54	26	12	13	12	2	207
	Denial Rate	30.0%	27.0%	32.1%	25.7%	21.1%	18.6%	18.5%	5.9%	25.7%
\$30,001–\$45,000	Loan Originated	105	151	148	102	44	57	33	46	686
	Application Denied	25	37	30	14	12	8	13	4	143
	Denial Rate	19.2%	19.7%	16.9%	12.1%	21.4%	12.3%	28.3%	8.0%	17.2%
\$45,001–\$60,000	Loan Originated	85	99	72	55	44	30	30	20	435
	Application Denied	10	17	15	12	4	5	7	3	73
	Denial Rate	10.5%	14.7%	17.2%	17.9%	8.3%	14.3%	18.9%	13.0%	14.4%
\$60,001–\$75,000	Loan Originated	56	38	37	19	19	15	16	8	208
	Application Denied	4	7	4	5	4	1	2	1	28
	Denial Rate	6.7%	15.6%	9.8%	20.8%	17.4%	6.3%	11.1%	11.1%	11.9%
Above \$75,000	Loan Originated	33	41	48	36	25	17	16	25	241
	Application Denied	6	4	2	7	3	1	1	3	27
	Denial Rate	15.4%	8.9%	4.0%	16.3%	10.7%	5.6%	5.9%	10.7%	10.1%
Data Missing	Loan Originated	5	13	6	3	2	3	1	1	34
	Application Denied	7	3	2	0	2	1	0	2	17
	Denial Rate	58.3%	18.8%	25.0%	.0%	50.0%	25.0%	.0%	66.7%	33.3%
Total	Loan Originated	391	464	434	293	182	185	152	133	2,234
	Application Denied	99	120	111	66	37	30	39	18	520
	Denial Rate	20.2%	20.5%	20.4%	18.4%	16.9%	14.0%	20.4%	11.9%	18.9%

Table 38.C.14
Loan Applications by Income and Race/Ethnicity of Applicant: Originated and Denied
 38. City of Massillon
 2004–2011 HMDA Data

Race		<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	> \$75K	Data Missing	Total
American Indian	Loan Originated	0	0	1	0	0	1	0	2
	Application Denied	0	1	0	0	0	0	0	1
	Denial Rate	%	100.0%	.0%	%	%	.0%	%	33.3%
Asian	Loan Originated	0	0	4	3	1	2	1	11
	Application Denied	0	0	0	0	0	0	0	0
	Denial Rate	%	%	.0%	.0%	.0%	.0%	.0%	.0%
Black	Loan Originated	3	29	25	16	10	8	0	91
	Application Denied	3	17	14	8	1	3	0	46
	Denial Rate	50.0%	37.0%	35.9%	33.3%	9.1%	27.3%	%	33.6%
White	Loan Originated	28	541	623	392	191	214	30	2,019
	Application Denied	22	155	120	56	19	21	15	408
	Denial Rate	44.0%	22.3%	16.2%	12.5%	9.0%	8.9%	33.3%	16.8%
Not Available	Loan Originated	2	27	33	24	6	16	3	111
	Application Denied	0	34	9	9	8	3	2	65
	Denial Rate	.0%	55.7%	21.4%	27.3%	57.1%	15.8%	40.0%	36.9%
Not Applicable	Loan Originated	0	0	0	0	0	0	0	0
	Application Denied	0	0	0	0	0	0	0	0
	Denial Rate	%	%	%	%	%	%	%	%
Total	Loan Originated	33	597	686	435	208	241	34	2,234
	Application Denied	25	207	143	73	28	27	17	520
	Denial Rate	43.1%	25.7%	17.2%	14.4%	11.9%	10.1%	33.3%	18.9%
Non-Hispanic Ethnicity	Loan Originated	31	552	640	398	196	219	31	2,067
	Application Denied	25	167	132	66	22	22	15	449
	Denial Rate	44.6%	23.2%	17.1%	14.2%	10.1%	9.1%	32.6%	17.8%
Hispanic (Ethnicity)	Loan Originated	0	7	5	6	1	3	0	22
	Application Denied	0	2	0	0	1	0	0	3
	Denial Rate	%	22.2%	.0%	.0%	50.0%	.0%	%	12.0%

PREDATORY LENDING

Table 38.C.15
Originated Owner-Occupied Loans by HAL Status
 38. City of Massillon
 2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Other	310	291	276	235	150	168	152	133	1,715
HAL	81	173	158	58	32	17	0	0	519
Total	391	464	434	293	182	185	152	133	2,234
Percent HAL	20.7%	37.3%	36.4%	19.8%	17.6%	9.2%	.0%	.0%	23.2%

Table 38.C.16
Loans by Loan Purpose by HAL Status
 38. City of Massillon
 2004–2011 HMDA Data

Loan Purpose		2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	Other	310	291	276	235	150	168	152	133	1,715
	HAL	81	173	158	58	32	17	0	0	519
	Percent HAL	20.7%	37.3%	36.4%	19.8%	17.6%	9.2%	.0%	.0%	23.2%
Home Improvement	Other	47	36	44	52	26	22	11	19	257
	HAL	28	31	34	37	6	5	6	3	150
	Percent HAL	37.3%	46.3%	43.6%	41.6%	18.8%	18.5%	35.3%	13.6%	36.9%
Refinancing	Other	408	306	230	241	162	223	254	202	2,026
	HAL	179	231	178	91	57	26	8	9	779
	Percent HAL	30.5%	43.0%	43.6%	27.4%	26.0%	10.4%	3.1%	4.3%	27.8%
Total	Other	765	633	550	528	338	413	417	354	3,998
	HAL	288	435	370	186	32	17	0	0	1,448
	Percent HAL	27.4%	40.7%	40.2%	26.1%	21.9%	10.4%	3.2%	3.3%	26.6%

Table 38.C.17
HALs Originated by Race of Borrower
 38. City of Massillon
 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	1	0	0	0	1
Black	5	11	8	4	0	1	0	0	29
White	67	140	139	52	29	16	0	0	443
Not Available	9	22	11	2	2	0	0	0	46
Not Applicable	0	0	0	0	0	0	0	0	0
Total	81	173	158	58	32	17	0	0	519
Hispanic (Ethnicity)	4	2	0	0	0	0	0	0	6

Table 38.C.18
Rate of HALs Originated by Race/Ethnicity of Borrower
 38. City of Massillon
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	%	%	.0%	%	%	%	%	.0%	.0%
Asian	.0%	.0%	.0%	.0%	100.0%	.0%	.0%	%	9.1%
Black	20.8%	42.3%	47.1%	50.0%	.0%	33.3%	.0%	.0%	31.9%
White	18.9%	34.3%	35.3%	18.8%	17.7%	9.2%	.0%	.0%	21.9%
Not Available	75.0%	75.9%	55.0%	33.3%	22.2%	.0%	.0%	.0%	41.4%
Not Applicable	%	%	%	%	%	%	%	%	%
Average	20.7%	37.3%	36.4%	19.8%	17.6%	9.2%	0.0%	0.0%	23.2%
Non-Hispanic Ethnicity	19.2%	34.5%	35.8%	19.4%	17.8%	9.7%	%	%	%
Hispanic (Ethnicity)	57.1%	66.7%	.0%	.0%	%	.0%	.0%	%	27.3%

Table 38.C.19
Loans by HAL Status by Race/Ethnicity of Borrower
 38. City of Massillon
 2004–2011 HMDA Data

Race	Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Other	0	0	1	0	0	0	0	1	2
	HAL	0	0	0	0	0	0	0	0	0
	Percent HAL	%	%	.0%	%	%	%	%	.0%	.0%
Asian	Other	1	1	2	2	0	3	1	0	10
	HAL	0	0	0	0	1	0	0	0	1
	Percent HAL	.0%	.0%	.0%	.0%	100.0%	.0%	.0%	%	9.1%
Black	Other	19	15	9	4	8	2	3	2	62
	HAL	5	11	8	4	0	1	0	0	29
	Percent HAL	20.8%	42.3%	47.1%	50.0%	.0%	33.3%	.0%	.0%	31.9%
White	Other	287	268	255	225	135	157	133	116	1,576
	HAL	67	140	139	52	29	16	0	0	443
	Percent HAL	18.9%	34.3%	35.3%	18.8%	17.7%	9.2%	0.0%	0.0%	21.9%
Not Available	Other	3	7	9	4	7	6	15	14	65
	HAL	9	22	11	2	2	0	0	0	46
	Percent HAL	75.0%	75.9%	55.0%	33.3%	22.2%	.0%	.0%	.0%	41.4%
Not Applicable	Other	0	0	0	0	0	0	0	0	0
	HAL	0	0	0	0	0	0	0	0	0
	Percent HAL	%	%	%	%	%	%	%	%	.0%
Total	Other	310	291	276	235	150	168	152	133	1,715
	HAL	81	173	158	58	32	17	0	0	519
	Percent HAL	20.7%	37.3%	36.4%	19.8%	17.6%	9.2%	.0%	.0%	23.2%
Non-Hispanic Ethnicity	Other	277	281	262	229	143	159	134	119	1,604
	HAL	66	148	146	55	31	17			
	Percent HAL	19.2%	34.5%	35.8%	19.4%	17.8%	9.7%	%	%	%
Hispanic (Ethnicity)	Other	3	1	5	2	0	2	3	0	16
	HAL	4	2	0	0	0	0	0	0	6
	Percent HAL	57.1%	66.7%	.0%	.0%	%	.0%	.0%	%	27.3%

Table 38.C.20
Rates of HALs by Income of Borrower
 38. City of Massillon
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Average
\$15,000 or Below	50.0%	33.3%	44.4%	33.3%	33.3%	16.7%	.0%	.0%	30.3%
\$15,001–\$30,000	26.7%	50.0%	36.8%	28.0%	17.8%	12.3%	.0%	.0%	27.5%
\$30,001–\$45,000	24.8%	39.1%	40.5%	21.6%	18.2%	7.0%	.0%	.0%	26.1%
\$45,001–\$60,000	21.2%	34.3%	43.1%	16.4%	15.9%	6.7%	.0%	.0%	23.2%
\$60,001–\$75,000	12.5%	13.2%	27.0%	5.3%	26.3%	.0%	.0%	.0%	13.5%
Above \$75,000	3.0%	24.4%	18.8%	8.3%	12.0%	11.8%	0.0%	.0%	11.6%
Data Missing	.0%	38.5%	33.3%	33.3%	.0%	33.3%	.0%	.0%	26.5%
Average	20.7%	37.3%	36.4%	19.8%	17.6%	9.2%	.0%	.0%	23.2%

Table 38.C.21
Loans by HAL Status by Income of Borrower
 38. City of Massillon
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Other	1	4	5	2	2	5	3	1	23
	HAL	1	2	4	1	1	1	0	0	10
	Percent HAL	50.0%	33.3%	44.4%	33.3%	33.3%	16.7%	.0%	.0%	30.3%
\$15,001–\$30,000	Other	77	58	72	54	37	50	53	32	433
	HAL	28	58	42	21	8	7	0	0	164
	Percent HAL	26.7%	50.0%	36.8%	28.0%	17.8%	12.3%	.0%	.0%	27.5%
\$30,001–\$45,000	Other	79	92	88	80	36	53	33	46	507
	HAL	26	59	60	22	8	4	0	0	179
	Percent HAL	24.8%	39.1%	40.5%	21.6%	18.2%	7.0%	.0%	.0%	26.1%
\$45,001–\$60,000	Other	67	65	41	46	37	28	30	20	334
	HAL	18	34	31	9	7	2	0	0	101
	Percent HAL	21.2%	34.3%	43.1%	16.4%	15.9%	6.7%	.0%	.0%	23.2%
\$60,001–\$75,000	Other	49	33	27	18	14	15	16	8	180
	HAL	7	5	10	1	5	0	0	0	28
	Percent HAL	12.5%	13.2%	27.0%	5.3%	26.3%	.0%	.0%	.0%	13.5%
Above \$75,000	Other	32	31	39	33	22	15	16	25	213
	HAL	1	10	9	3	3	2	0	0	28
	Percent HAL	3.0%	24.4%	18.8%	8.3%	12.0%	11.8%	.0%	.0%	11.6%
Data Missing	Other	5	8	4	2	2	2	1	1	25
	HAL	0	5	2	1	0	1	0	0	9
	Percent HAL	.0%	38.5%	33.3%	33.3%	.0%	33.3%	.0%	.0%	26.5%
Total	Other	310	291	276	235	150	168	152	133	1,715
	HAL	81	173	158	58	32	17	0	0	519
	Percent HAL	20.7%	37.3%	36.4%	19.8%	17.6%	9.2%	.0%	.0%	23.2%

D. CRA DATA

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

Table 38.D.1
Small Business Loans Originated: \$100,000 or Less by Tract MFI
 38. City of Massillon
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000		194	155			349
2001		130	192			322
2002		109	252			361
2003	67	111	149			327
2004	76	110	185			371
2005	76	122	198			396
2006	94	131	266			491
2007	103	155	280			538
2008	79	135	204			418
2009	21	42	87			150
2010	21	44	84			149
2011	25	70	88			183
Total	562	1,353	2,140	0	0	4,055
Loan Amount (\$1,000s)						
2000		1,384	2,528			3,912
2001		1,260	1,964			3,224
2002		1,127	2,870			3,997
2003	866	1,532	1,519			3,917
2004	612	1,317	2,264			4,193
2005	755	1,209	1,885			3,849
2006	860	1,221	2,831			4,912
2007	507	1,646	2,958			5,111
2008	960	1,269	1,706			3,935
2009	250	578	709			1,537
2010	451	730	1,255			2,436
2011	226	1,008	1,181			2,415
Total	5,487	14,281	23,670	0	0	43,438

Table 38.D.2
Small Business Loans Originated: \$100,001 to \$250,000 by Tract MFI
 38. City of Massillon
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000		4	9			13
2001		3	15			18
2002		1	22			23
2003	2	4	8			14
2004	4	5	10			19
2005	5	3	10			18
2006	1	3	12			16
2007	0	4	8			12
2008	2	2	3			7
2009	0	3	1			4
2010	2	3	5			10
2011	2	1	1			4
Total	18	36	104	0	0	158
Loan Amount (\$1,000s)						
2000		680	1,673			2,353
2001		569	2,707			3,276
2002		125	3,817			3,942
2003	250	706	1,382			2,338
2004	630	857	1,788			3,275
2005	790	635	2,031			3,456
2006	150	568	1,979			2,697
2007	0	541	1,225			1,766
2008	216	381	522			1,119
2009	0	375	130			505
2010	300	663	959			1,922
2011	288	250	122			660
Total	2,624	6,350	18,335	0	0	27,309

Table 38.D.3
Small Business Loans Originated: More than \$250,000 by Tract MFI
 38. City of Massillon
 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	6			12
2001		1	15			16
2002		7	14			21
2003	0	5	14			19
2004	1	9	14			24
2005	0	5	9			14
2006	1	5	11			17
2007	0	2	8			10
2008	1	3	2			6
2009	2	3	3			8
2010	3	5	12			20
2011	1	3	6			10
Total	9	54	114	0	0	177
Loan Amount (\$1,000s)						
2000		2,877	3,194			6,071
2001		600	7,410			8,010
2002		3,400	8,018			11,418
2003	0	3,200	8,036			11,236
2004	446	4,669	8,366			13,481
2005	0	2,294	5,120			7,414
2006	300	2,880	6,870			10,050
2007	0	826	4,287			5,113
2008	750	1,212	1,350			3,312
2009	900	2,250	1,346			4,496
2010	1,775	2,985	5,493			10,253
2011	369	2,500	3,200			6,069
Total	4,540	29,693	62,690	0	0	96,923

Table 38.D.4
Small Business Loans to Businesses with Gross Annual Revenues of Less Than \$1 Million by Tract MFI
 38. City of Massillon
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000		142	72			214
2001		89	82			171
2002		22	73			95
2003	23	32	45			100
2004	25	34	54			113
2005	42	55	85			182
2006	31	51	118			200
2007	29	62	101			192
2008	22	51	62			135
2009	6	17	29			52
2010	14	25	41			80
2011	11	37	35			83
Total	203	617	797	0	0	1,617
Loan Amount (\$1,000s)						
2000		1,380	2,593			3,973
2001		1,327	4,540			5,867
2002		812	5,570			6,382
2003	601	2,208	2,849			5,658
2004	296	1,460	2,222			3,978
2005	707	773	1,959			3,439
2006	725	1,186	1,999			3,910
2007	151	1,524	2,011			3,686
2008	346	1,529	1,375			3,250
2009	55	390	554			999
2010	1,328	928	1,773			4,029
2011	272	573	440			1,285
Total	4,481	14,090	27,885	0	0	46,456

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 38.E.1
Fair Housing Complaints by Basis
38. City of Massillon
2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color						1				1
Disability	1	1	5		3	4	9		2	25
Family Status	2			1		5			2	10
National Origin		2							1	3
Race	3	2	1	1		7				14
Religion					1					1
Total Bases	6	5	6	2	4	17	9		5	54
Total Complaints	5	4	6	2	3	12	9		5	46

Table 38.E.2
Fair Housing Complaints by Issue
38. City of Massillon
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					6			9
Failure to make reasonable accommodation	1						8			9
Discriminatory terms, conditions, privileges, or services and facilities			1		2	2	1		1	7
Discriminatory refusal to rent	2			1		3				6
Discriminatory advertisement - rental						1			2	3
Non-compliance with design and construction requirements (handicap)			3							3
Failure to provide accessible and usable public and common user areas			3							3
Discriminatory advertising, statements, and notices				1		1				2
Other discriminatory acts	1				1					2
Adverse action against an employee						2				2
Discriminatory acts under Section 818 (coercion, etc.)						2				2
Failure to provide an accessible building entrance			2							2
Discrimination in terms, conditions or privileges relating to rental		2	1	1		4	1		2	11
Discriminatory refusal to negotiate for rental							1			1
Discriminatory financing (includes real estate transactions)					1					1
Discrimination in making of loans	1									1
Redlining	1									1
Otherwise deny or make housing available						1				1
Failure to provide usable doors			1							1
Failure to provide an accessible route into and thru the covered unit			1							1
Failure to permit reasonable modification			1							1
Total Issues	7	4	13	3	4	16	17	0	5	69
Total Complaints	5	4	6	2	3	12	9		5	46

Table 38.E.3
Fair Housing Complaints by Closure Status
 38. City of Massillon
 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	3	1	4	1		3	4		1	17
No Cause	2	2	1	1	2	3				11
Open									3	3
Total Complaints	5	4	6	2	3	12	9		5	46

HUD Complaints Found With Cause

Table 38.E.4
Fair Housing Complaints Found With Cause by Basis
 38. City of Massillon
 2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color						1				1
Disability	1		4			2	9			16
Family Status	2			1		4			1	8
National Origin		1								1
Race	1	1	1			5				8
Total Bases	4	2	5	1		12	9		1	34
Total Complaints	3	1	5	1		8	9		1	28

Table 38.E.5
Fair Housing Complaints Found With Cause by Issue
 38. City of Massillon
 2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Failure to make reasonable accommodation			1						8	9
Discriminatory refusal to rent and negotiate for rental			1						6	7
Discrimination in terms, conditions or privileges relating to rental				1	1			3	1	6
Discriminatory refusal to rent			2			1		2		5
Discriminatory terms, conditions, privileges, or services and facilities					1			1	1	3
Failure to provide accessible and usable public and common user areas					3					3
Discriminatory advertising, statements, and notices						1		1		2
Adverse action against an employee								2		2
Discriminatory acts under Section 818 (coercion, etc.)								2		2
Non-compliance with design and construction requirements (handicap)					2					2
Failure to provide an accessible building entrance					2					2
Discriminatory refusal to negotiate for rental									1	1
Discriminatory advertisement - rental										1
Otherwise deny or make housing available							1			1
Failure to provide usable doors					1					1
Failure to provide an accessible route into and thru the covered unit					1					1
Failure to permit reasonable modification					1					1
Total Issues	4	1	12	2	0	12	17	0	1	49
Total Complaints	3	1	5	1		8	9		1	28

OHIO CIVIL RIGHTS COMMISSION COMPLAINTS

Table 38.E.6
Fair Housing Complaints by Basis
 38. City of Massillon
 2004–2012 OCRC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability	3	1	1			2	9	2		18
Family Status	2					6			1	9
National Origin									1	1
Race	3	1			3	1	1			8
Retaliation						1		2		3
Other			1							1
Total Bases	8	2	2	0	0	12	10	4	2	40
Total Complaints	7	2	2			9	10	2	2	34

Table 38.E.7
Fair Housing Complaints by Issue
 38. City of Massillon
 2004–2012 OCRC Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Advertising	3								1	4
Harassment	1									1
Intimidation						1		1		2
Other	6		1			2			1	10
Reasonable Accommodation		2	1				5			8
Terms and Conditions	1					7	5	2	1	16
Total Issues	11	2	2	0	0	10	10	3	3	41
Total Complaints	7	2	2			9	10	2	2	34

Table 38.E.8
Fair Housing Complaints by Closure Status
 38. City of Massillon
 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			2
CP Withdrawal – No Benefit	1									1
No Cause Finding Issued	1	2	1			1				5
No Jurisdiction								1	1	2
Open Charge Closed By Legal Activity						5				5
Settlement With Benefits	3		1			1	4	1	1	11
Successful Conciliation							5			5
Withdrawal With Benefits	2									2
Total Complaints	7	2	2	0	0	9	10	2	2	34

FAIR HOUSING CONTACT SERVICE COMPLAINTS

Table 38.E.9
Fair Housing Complaints by Basis
 38. City of Massillon
 2004–2012 FHCS Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability			1		1	3	13		2	20
Familial Status						2			4	6
Retaliation						5	1			6
Sex									2	2
Other						1				1
Total Bases	0	0	1	0	1	11	14	0	8	35
Total Complaints			1		1	8	14		6	30

Table 38.E.10
Fair Housing Complaints by Closure Status
 38. City of Massillon
 2004–2012 FHCS Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Closed							2			2
Elected not to pursue						1			1	2
Independently resolved						1	1			2
Inquiry			1						1	2
No probable cause					1	2				3
Pending						1			2	3
Probable cause							5		1	6
Reasonable accommodation granted							1			1
Referred for other assistance							1			1
Settled						3	4		1	8
Total Complaints	0	0	1	0	1	8	14	0	6	30

F. FAIR HOUSING SURVEY FOR HOUSING STAKEHOLDERS DATA

No responses were received from Massillon in the 2012–2013 Fair Housing Survey for Housing Stakeholders.

G. LAND USE PLANNING SURVEY DATA

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. While multiple attempts were made to contact the prospective survey respondents in each community, or the Progress Review Team member for communities where no names were received, in the City of Massillon, no planning or development staff responded to complete the interview.

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 Massillon. 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 Massillon.

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 Massillon.*

Results of the Fair Housing Surveys indicate that City may not have sufficient policies or practices to completely address the duty to affirmatively further fair housing.

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 City of Massillon. 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 the City of Massillon.

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 in the City. 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 38.H.1
Impediments Matrix
 38. City of Massillon
 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 ⁵³		
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			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	Lack of inclusionary policies							X		X	All	M

⁵³ 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.

39. REMAINDER OF STARK COUNTY

A. CENSUS BUREAU DATA

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

Table 39.A.1

Population by Age

39. Remainder of Stark County
2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Under 5	14,244	5.9%	12,594	5.1%	-11.6%
5 to 19	50,725	20.9%	48,952	19.7%	-3.5%
20 to 24	11,442	4.7%	12,539	5.1%	9.6%
25 to 34	27,548	11.3%	24,977	10.1%	-9.3%
35 to 54	77,084	31.8%	70,687	28.5%	-8.3%
55 to 64	25,044	10.3%	35,667	14.4%	42.4%
65 or Older	36,685	15.1%	42,732	17.2%	16.5%
Total	242,772	100.0%	248,148	100.0%	2.2%

Table 39.A.2

Elderly Population by Age

39. Remainder of Stark County
2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
65 to 66	3,824	10.4%	4,979	11.7%	30.2%
67 to 69	5,919	16.1%	7,469	17.5%	26.2%
70 to 74	9,502	25.9%	9,655	22.6%	1.6%
75 to 79	8,312	22.7%	7,803	18.3%	-6.1%
80 to 84	5,105	13.9%	6,501	15.2%	27.3%
85 or Older	4,023	11.0%	6,325	14.8%	57.2%
Total	36,685	100.0%	42,732	100.0%	16.5%

Table 39.A.3

Population by Race and Ethnicity

39. Remainder of Stark County
2000 & 2010 Census SF1 Data

Race	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
White	233,717	96.3%	235,775	95.0%	.9%
Black	4,681	1.9%	5,723	2.3%	22.3%
American Indian	414	.2%	479	.2%	15.7%
Asian	1,544	.6%	2,216	.9%	43.5%
Native Hawaiian/ Pacific Islander	28	.0%	39	.0%	39.3%
Other	405	.2%	702	.3%	73.3%
Two or More Races	1,983	.8%	3,214	1.3%	62.1%
Total	242,772	100.0%	248,148	100.0%	2.2%
Non-Hispanic	240,851	99.2	245,151	98.8%	1.8%
Hispanic	1,921	.8%	2,997	1.2%	56.0%

Table 39.A.4**Disability by Age**39. Remainder of Stark County
2010 Three-Year ACS Data

Age	Male		Female		Total	
	Disabled Population	Disability Rate	Disabled Population	Disability Rate	Disabled Population	Disability Rate
Under 5	17	.3%	0	.0%	17	.1%
5 to 17	2,099	9.4%	794	3.7%	2,893	6.7%
18 to 34	1,265	5.8%	1,019	4.6%	2,284	5.2%
35 to 64	5,224	10.1%	5,574	10.3%	10,798	10.2%
65 to 74	2,514	24.8%	2,525	21.8%	5,039	23.2%
75 or Older	3,848	51.5%	4,970	47.0%	8,818	48.9%
Total	14,967	12.5%	14,882	11.8%	29,849	12.2%

Table 39.A.5**Employment Status by Disability and Type: Age 18 to 64**39. Remainder of Stark County
2010 Three-Year ACS Data

Disability Status	Population
Employed:	112,144
With a disability:	5,425
With a hearing difficulty	1,312
With a vision difficulty	1,047
With a cognitive difficulty	1,591
With an ambulatory difficulty	2,074
With a self-care difficulty	687
With an independent living difficulty	1,040
No disability	106,719
Unemployed:	9,094
With a disability:	775
With a hearing difficulty	92
With a vision difficulty	259
With a cognitive difficulty	333
With an ambulatory difficulty	168
With a self-care difficulty	83
With an independent living difficulty	144
No disability	8,319
Not in labor force:	28,178
With a disability:	6,882
With a hearing difficulty	1,088
With a vision difficulty	693
With a cognitive difficulty	3,320
With an ambulatory difficulty	4,426
With a self-care difficulty	1,547
With an independent living difficulty	2,735
No disability	21,296
Total	149,416

Table 39.A.6**Households by Income**39. Remainder of Stark 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	9,421	10.0%	8,297	8.5%
\$15,000 to \$19,999	5,379	5.7%	5,517	5.6%
\$20,000 to \$24,999	5,821	6.2%	5,341	5.4%
\$25,000 to \$34,999	12,671	13.5%	11,035	11.3%
\$35,000 to \$49,999	18,175	19.3%	15,812	16.1%
\$50,000 to \$74,999	21,865	23.2%	21,013	21.4%
\$75,000 to \$99,999	10,323	11.0%	13,613	13.9%
\$100,000 or More	10,477	11.1%	17,416	17.8%
Total	94,132	100.0%	98,044	100.0%

Table 39.A.7**Poverty by Age**39. Remainder of Stark 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	11.3%	2,125	11.3%
6 to 17	2,354	19.8%	4,141	22.1%
18 to 64	6,590	55.6%	10,660	56.9%
65 or Older	1,580	13.3%	1,802	9.6%
Total	11,860	100.0%	18,728	100.0%
Poverty Rate	5.0%	.	7.7%	.

Table 39.A.8**Households by Year Home Built**39. Remainder of Stark 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	12,770	13.5%	11,001	11.2%
1940 to 1949	7,149	7.6%	6,775	6.9%
1950 to 1959	15,595	16.5%	15,924	16.2%
1960 to 1969	15,418	16.3%	15,055	15.4%
1970 to 1979	20,888	22.1%	19,634	20.0%
1980 to 1989	9,787	10.4%	8,942	9.1%
1990 to 1999	12,712	13.5%	11,926	12.2%
2000 to 2004	.	.	6,262	6.4%
2005 or Later	.	.	2,525	2.6%
Total	94,319	100.0%	98,044	100.0%

Table 39.A.9**Housing Units by Type**39. Remainder of Stark 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	78,487	79.8%	85,664	82.5%
Duplex	5,519	5.6%	4,292	4.1%
Tri- or Four-Plex	2,968	3.0%	3,185	3.1%
Apartment	8,024	8.2%	7,478	7.2%
Mobile Home	3,343	3.4%	3,143	3.0%
Boat, RV, Van, Etc.	26	.0%	62	.1%
Total	98,367	100.0%	103,824	100.0%

Table 39.A.10**Housing Units by Tenure**39. Remainder of Stark County
2000 & 2010 Census SF1 Data

Tenure	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
Occupied Housing Units	94,264	95.9%	99,634	93.9%	5.7%
Owner-Occupied	73,860	78.4%	77,059	77.3%	4.3%
Renter-Occupied	20,404	21.6%	22,575	22.7%	10.6%
Vacant Housing Units	3,985	4.1%	6,519	6.1%	63.6%
Total Housing Units	98,249	100.0%	106,153	100.0%	8.0%

Table 39.A.11**Disposition of Vacant Housing Units**39. Remainder of Stark County
2000 & 2010 Census SF1 Data

Disposition	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
For Rent	1,451	36.4%	2,290	35.1%	57.8%
For Sale	840	21.1%	1,315	20.2%	56.5%
Rented or Sold, Not Occupied	454	11.4%	542	8.3%	19.4%
For Seasonal, Recreational, or Occasional Use	350	8.8%	576	8.8%	64.6%
For Migrant Workers	81	02.0%	7	.1%	-91.4%
Other Vacant	809	20.3%	1,789	27.4%	121.1%
Total	3,985	100.0%	6,519	100.0%	63.6%

Table 39.A.12**Households by Household Size**39. Remainder of Stark County
2000 & 2010 Census SF1 Data

Size	2000 Census		2010 Census		% Change 00-10
	Households	% of Total	Households	% of Total	
One Person	21,492	22.8%	25,106	25.2%	16.8%
Two Persons	34,416	36.5%	37,392	37.5%	8.6%
Three Persons	15,968	16.9%	15,958	16.0%	-.1%
Four Persons	14,107	15.0%	13,018	13.1%	-7.7%
Five Persons	5,933	6.3%	5,474	5.5%	-7.7%
Six Persons	1,686	1.8%	1,864	1.9%	10.6%
Seven Persons or More	662	.7%	822	.8%	24.2%
Total	94,264	100.0%	99,634	100.0%	5.7%

Table 39.A.13**Household Type by Tenure**39. Remainder of Stark County
2000 & 2010 Census SF1 Data

Household Type	2000 Census		2010 Census		% Change 00–10
	Households	% of Total	Households	% of Total	
Family Households	68,987	73.2%	69,799	70.1%	1.2%
Married-Couple Family	58,310	84.5%	56,258	80.6%	-3.5%
Owner-Occupied	52,139	89.4%	50,566	89.9%	-3.0%
Renter-Occupied	6,171	10.6%	5,692	10.1%	-7.8%
Other Family	10,677	15.5%	13,541	19.4%	26.8%
Male Householder, No Spouse	2,958	27.7%	4,110	30.4%	38.9%
Owner-Occupied	1,973	66.7%	2,689	65.4%	36.3%
Renter-Occupied	985	33.3%	1,421	34.6%	44.3%
Female Householder, No Spouse	7,719	72.3%	9,431	69.6%	22.2%
Owner-Occupied	4,764	61.7%	5,463	57.9%	14.7%
Renter-Occupied	2,955	38.3%	3,968	42.1%	34.3%
Non-Family Households	25,277	26.8%	29,835	29.9%	18.0%
Owner-Occupied	14,984	59.3%	18,341	61.5%	22.4%
Renter-Occupied	10,293	40.7%	11,494	38.5%	11.7%
Total	94,264	100.0%	99,634	100.0%	5.7%

Table 39.A.14**Group Quarters Population**39. Remainder of Stark 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	0	.0%	14	.7%	%
Juvenile Facilities	.	.	101	4.8%	.
Nursing Homes	2,338	95.5%	2,001	94.6%	-14.4%
Other Institutions	109	4.5%	0	.0%	-100.0%
Total	2,447	100.0%	2,116	100.0%	-13.5%
Noninstitutionalized					
College Dormitories	435	54.3%	902	70.5%	107.4%
Military Quarters	0	.0%	0	.0%	%
Other Noninstitutional	366	45.7%	378	29.5%	3.3%
Total	801	24.7%	1,280	37.7%	59.8%
Total Group Quarters Population	3,248	100.0%	3,396	100.0%	4.6%

Table 39.A.15**Overcrowding and Severe Overcrowding**39. Remainder of Stark 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	73,560	99.4%	395	.5%	65	.1%	74,020
2010 ACS	75,502	99.4%	380	.5%	81	.1%	75,963
Renter							
2000 Census	19,993	98.5%	238	1.2%	68	.3%	20,299
2010 ACS	21,770	98.6%	298	1.3%	13	.1%	22,081
Total							
2000 Census	93,553	99.2%	633	.7%	133	.1%	94,319
2010 ACS	97,272	99.2%	678	.7%	94	.1%	98,044

Table 39.A.16
Households with Incomplete Plumbing Facilities
 39. Remainder of Stark County
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Plumbing Facilities	94,114	97,887
Lacking Complete Plumbing Facilities	205	157
Total Households	94,319	98,044
Percent Lacking	.2%	.2%

Table 39.A.17
Households with Incomplete Kitchen Facilities
 39. Remainder of Stark County
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Kitchen Facilities	93,982	97,491
Lacking Complete Kitchen Facilities	337	553
Total Households	94,319	98,044
Percent Lacking	.4%	.6%

Table 39.A.18
Cost Burden and Severe Cost Burden by Tenure
 39. Remainder of Stark 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	34,939	78.9%	6,456	14.6%	2,786	6.3%	116	.3%	44,297
2010 ACS	36,352	71.4%	9,896	19.4%	4,583	9.0%	85	.2%	50,916
Owner Without a Mortgage									
2000 Census	19,899	93.0%	731	3.4%	522	2.4%	249	1.2%	21,401
2010 ACS	22,256	88.9%	1,801	7.2%	822	3.3%	168	.7%	25,047
Renter									
2000 Census	13,174	66.4%	3,131	15.8%	2,344	11.8%	1,197	6.0%	19,846
2010 ACS	11,946	54.1%	4,564	20.7%	4,049	18.3%	1,522	6.9%	22,081
Total									
2000 Census	68,012	79.5%	10,318	12.1%	5,652	6.6%	1,562	1.8%	85,544
2010 ACS	70,554	72.0%	16,261	16.6%	9,454	9.6%	1,775	1.8%	98,044

Table 39.A.19
Median Housing Costs
 39. Remainder of Stark County
 2000 Census SF3 & 2010 Five-Year ACS Data

Housing Cost	2000 Census	2010 ACS
Median Contract Rent	\$-647	\$-828
Median Home Value	\$-119,900	\$-138,100

B. BLS DATA

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

Table 39.B.1
Labor Force Statistics
 39. Remainder of Stark County
 1990–2011 BLS Data

Year	Labor Force	Employment	Unemployment	Unemployment Rate	Statewide Unemployment Rate
1990	131,542	124,901	6,641	5.0%	5.7%
1991	132,727	125,100	7,627	5.7%	6.6%
1992	133,411	124,930	8,481	6.4%	7.4%
1993	132,587	124,864	7,723	5.8%	6.7%
1994	132,871	126,436	6,435	4.8%	5.6%
1995	133,784	128,376	5,408	4.0%	4.9%
1996	135,646	129,641	6,005	4.4%	5.0%
1997	135,730	130,348	5,382	4.0%	4.6%
1998	135,850	131,217	4,633	3.4%	4.3%
1999	134,968	130,036	4,932	3.7%	4.3%
2000	139,688	134,985	4,703	3.4%	4.0%
2001	140,085	135,151	4,934	3.5%	4.4%
2002	138,744	132,085	6,659	4.8%	5.7%
2003	138,800	129,979	8,821	6.4%	6.2%
2004	138,107	129,548	8,559	6.2%	6.1%
2005	138,012	129,772	8,240	6.0%	5.9%
2006	137,914	130,501	7,413	5.4%	5.4%
2007	138,770	131,119	7,651	5.5%	5.6%
2008	138,982	130,130	8,852	6.4%	6.5%
2009	138,861	123,879	14,982	10.8%	10.1%
2010	139,043	124,082	14,961	10.8%	10.0%
2011	137,548	125,481	12,067	8.8%	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.⁵⁴ The information presented in this section presents detailed HMDA data, including denial rates and predatory lending including high annual percentage rate (APR) loans.

Table 39.C.1

Purpose of Loan by Year
39. Remainder of Stark County
2004–2011 HMDA Data

Purpose	2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	6,914	7,862	7,491	5,587	4,151	3,903	3,681	3,663	43,252
Home Improvement	1,537	1,787	1,963	1,521	1,088	560	524	527	9,507
Refinancing	15,356	14,297	12,938	9,600	6,460	9,488	8,897	7,729	84,765
Total	23,807	23,946	22,392	16,708	11,699	13,951	13,102	11,919	137,524

Table 39.C.2

Occupancy Status for Home Purchase Loan Applications
39. Remainder of Stark County
2004–2011 HMDA Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	Total
Owner-Occupied	6,409	7,322	6,966	5,213	3,886	3,754	3,510	3,469	40,529
Not Owner-Occupied	436	510	490	336	253	142	167	187	2,521
Not Applicable	69	30	35	38	12	7	4	7	202
Total	6,914	7,862	7,491	5,587	4,151	3,903	3,681	3,663	43,252

Table 39.C.3

Owner-Occupied Home Purchase Loan Applications by Loan Type
39. Remainder of Stark County
2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Conventional	5,763	6,714	6,322	4,563	2,186	1,453	1,411	1,599	30,011
FHA - Insured	532	467	532	549	1,502	2,001	1,847	1,484	8,914
VA - Guaranteed	107	134	112	98	138	156	175	209	1,129
Rural Housing Service or Farm Service Agency	7	7	0	3	60	144	77	177	475
Total	6,409	7,322	6,966	5,213	3,886	3,754	3,510	3,469	40,529

⁵⁴ 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 39.C.4
Loan Applications by Action Taken
 39. Remainder of Stark County
 2004–2011 HMDA Data

Action	2004	2005	2006	2007	2008	2009	2010	2011	Total
Loan Originated	3,848	4,044	3,878	2,988	2,189	2,092	1,865	1,750	22,654
Application Approved but not Accepted	313	464	385	237	170	91	98	87	1,845
Application Denied	536	741	645	459	365	298	275	265	3,584
Application Withdrawn by Applicant	315	444	382	223	177	142	157	142	1,982
File Closed for Incompleteness	131	113	95	70	40	22	27	24	522
Loan Purchased by the Institution	1,266	1,510	1,579	1,236	945	1,109	1,088	1,201	9,934
Preapproval Request Denied	0	6	2	0	0	0	0	0	8
Preapproval Approved but not Accepted	0	0	0	0	0	0	0	0	0
Total	6,409	7,322	6,966	5,213	3,886	3,754	3,510	3,469	40,529
Denial Rate	12.2%	15.5%	14.3%	13.3%	14.3%	12.5%	12.9%	13.2%	13.7%

Table 39.C.5
Denial Rates by Gender of Applicant
 39. Remainder of Stark County
 2004–2011 HMDA Data

Year	Male	Female	Not Available	Not Applicable	Average
2004	10.4%	14.4%	39.1%	%	12.2%
2005	14.6%	16.2%	32.6%	%	15.5%
2006	13.6%	14.8%	26.9%	%	14.3%
2007	12.0%	14.7%	36.6%	.0%	13.3%
2008	13.1%	16.0%	23.3%	.0%	14.3%
2009	12.4%	12.3%	14.9%	%	12.5%
2010	12.1%	14.0%	17.0%	%	12.9%
2011	13.0%	12.5%	17.8%	100.0%	13.2%
Average	12.7%	14.6%	26.7%	25.0%	13.7%

Table 39.C.6
Loan Applications by Selected Action Taken by Gender of Applicant
 39. Remainder of Stark County
 2004–2011 HMDA Data

Gender		2004	2005	2006	2007	2008	2009	2010	2011	Total
Male	Originated	2,858	2,918	2,815	2,197	1,548	1,456	1,262	1,218	16,272
	Denied	332	498	444	299	234	206	173	182	2,368
	Denial Rate	10.4%	14.6%	13.6%	12.0%	13.1%	12.4%	12.1%	13.0%	12.7%
Female	Originated	912	1,037	976	730	561	562	515	449	5,742
	Denied	154	200	169	126	107	79	84	64	983
	Denial Rate	14.4%	16.2%	14.8%	14.7%	16.0%	12.3%	14.0%	12.5%	14.6%
Not Available	Originated	78	89	87	59	79	74	88	83	637
	Denied	50	43	32	34	24	13	18	18	232
	Denial Rate	39.1%	32.6%	26.9%	36.6%	23.3%	14.9%	17.0%	17.8%	26.7%
Not Applicable	Originated	0	0	0	2	1	0	0	0	3
	Denied	0	0	0	0	0	0	0	1	1
	Denial Rate	%	%	%	.0%	.0%	%	%	100.0%	25.0%
Total	Originated	3,848	4,044	3,878	2,988	2,189	2,092	1,865	1,750	22,654
	Denied	536	741	645	459	365	298	275	265	3,584
	Denial Rate	12.2%	15.5%	14.3%	13.3%	14.3%	12.5%	12.9%	13.2%	13.7%

Table 39.C.7
Denial Rates by Race/Ethnicity of Applicant
 39. Remainder of Stark County
 2004–2011 HMDA Data

Race/Ethnicity	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	20.0%	30.0%	36.4%	14.3%	40.0%	.0%	55.6%	16.7%	25.8%
Asian	7.0%	12.5%	8.9%	11.8%	12.5%	25.0%	10.0%	.0%	11.0%
Black	20.9%	31.0%	36.8%	29.7%	29.6%	22.5%	33.3%	13.2%	28.3%
White	10.7%	13.9%	13.2%	12.0%	13.3%	11.9%	12.0%	12.2%	12.5%
Not Available	33.7%	28.9%	23.6%	30.8%	24.3%	18.9%	17.6%	25.2%	26.6%
Not Applicable	25.0%	%	%	.0%	.0%	0%	0%	100.0%	25.0%
Average	12.2%	15.5%	14.3%	13.3%	14.3%	12.5%	12.9%	13.2%	13.7%
Non-Hispanic	10.5%	14.4%	13.5%	12.3%	13.5%	12.3%	12.5%	12.3%	12.8%
Hispanic	21.8%	9.5%	17.2%	20.0%	22.7%	4.5%	10.3%	.0%	14.4%

Table 39.C.8
Loan Applications by Selected Action Taken by Race/Ethnicity of Applicant
 39. Remainder of Stark County
 2004–2011 HMDA Data

Race		2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Originated	4	7	7	6	3	13	4	5	49
	Denied	1	3	4	1	2	0	5	1	17
	Denial Rate	20.0%	30.0%	36.4%	14.3%	40.0%	55.6%	55.6%	16.7%	25.8%
Asian	Originated	40	28	41	30	21	18	18	15	211
	Denied	3	4	4	4	3	6	2	0	26
	Denial Rate	7.0%	12.5%	8.9%	11.8%	12.5%	25.0%	10.0%	.0%	11.0%
Black	Originated	68	78	60	52	38	31	20	33	380
	Denied	18	35	35	22	16	9	10	5	150
	Denial Rate	20.9%	31.0%	36.8%	29.7%	29.6%	22.5%	33.3%	13.2%	28.3%
White	Originated	3,566	3,677	3,589	2,781	2,014	1,940	1,711	1,584	20,862
	Denied	428	596	546	380	308	262	234	220	2,974
	Denial Rate	10.7%	13.9%	13.2%	12.0%	13.3%	11.9%	12.0%	12.2%	12.5%
Not Available	Originated	167	254	181	117	112	90	112	113	1,146
	Denied	85	103	56	52	36	21	24	38	415
	Denial Rate	33.7%	28.9%	23.6%	30.8%	24.3%	18.9%	17.6%	25.2%	26.6%
Not Applicable	Originated	3	0	0	2	1	0	0	0	6
	Denied	1	0	0	0	0	0	0	1	2
	Denial Rate	33.7%	28.9%	23.6%	30.8%	24.3%	18.9%	17.6%	25.2%	25.0%
Total	Originated	3,848	4,044	3,878	2,988	2,189	2,092	1,865	1,750	22,654
	Denied	536	741	645	459	365	298	275	265	3,584
	Denial Rate	12.2%	15.5%	14.3%	13.3%	14.3%	12.5%	12.9%	13.2%	13.7%
Non-Hispanic	Originated	3,316	3,721	3,660	2,855	2,053	1,965	1,718	1,620	20,908
	Denied	389	627	573	400	320	275	245	228	3,057
	Denial Rate	10.5%	14.4%	13.5%	12.3%	13.5%	12.3%	12.5%	12.3%	12.8%
Hispanic	Originated	43	38	24	20	17	21	26	19	208
	Denied	12	4	5	5	5	1	3	0	35
	Denial Rate	21.8%	9.5%	17.2%	20.0%	22.7%	4.5%	10.3%	.0%	14.4%

Table 39.C.9
Loan Applications by Reason for Denial
 39. Remainder of Stark County
 2004–2011 HMDA Data

Denial Reason	2004	2005	2006	2007	2008	2009	2010	2011	Total
Debt-to-Income Ratio	59	79	71	76	61	64	54	55	519
Employment History	8	6	7	12	8	13	8	9	71
Credit History	91	165	126	75	80	56	58	46	697
Collateral	32	65	79	55	64	54	67	46	462
Insufficient Cash	9	11	10	8	7	13	9	4	71
Unverifiable Information	15	22	13	31	14	9	6	9	119
Credit Application Incomplete	46	57	42	53	28	29	26	44	325
Mortgage Insurance Denied	0	0	0	0	2	2	0	1	5
Other	122	183	107	41	27	13	19	22	534
Missing	154	153	190	108	74	45	28	29	781
Total	536	741	645	459	365	298	275	265	3,584

Table 39.C.10
Denial Rates by Income of Applicant
 39. Remainder of Stark County
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	34.2%	50.0%	52.9%	52.4%	51.4%	69.2%	55.0%	52.9%	51.0%
\$15,001–\$30,000	24.3%	28.7%	26.8%	18.9%	27.9%	18.1%	25.1%	21.5%	24.1%
\$30,001–\$45,000	13.0%	18.0%	16.9%	14.5%	15.4%	11.6%	12.4%	14.7%	15.0%
\$45,001–\$60,000	10.5%	13.6%	12.5%	13.4%	13.0%	12.4%	9.7%	10.7%	12.2%
\$60,001–\$75,000	8.8%	14.0%	9.8%	12.8%	8.9%	11.0%	9.1%	12.4%	11.0%
Above \$75,000	7.1%	8.7%	9.9%	9.3%	9.8%	7.9%	8.6%	8.1%	8.8%
Data Missing	20.9%	20.6%	21.4%	21.7%	16.7%	21.1%	29.6%	33.3%	22.0%
Total	12.2%	15.5%	14.3%	13.3%	14.3%	12.5%	12.9%	13.2%	13.7%

Table 39.C.11
Denial Rates of Loans by Race/Ethnicity and Income of Applicant
 39. Remainder of Stark County
 2004–2011 HMDA Data

Race	<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	Above \$75K	Data Missing	Average
American Indian	%	71.4%	29.4%	25.0%	30.0%	7.4%	100.0%	25.8%
Asian	.0%	27.6%	10.3%	14.6%	4.5%	6.5%	20.0%	11.0%
Black	100.0%	29.4%	26.3%	26.2%	27.0%	27.9%	66.7%	28.3%
White	50.0%	22.6%	13.9%	11.1%	10.1%	7.7%	15.9%	12.5%
Not Available	64.7%	41.2%	28.9%	24.7%	18.9%	17.7%	58.8%	26.6%
Not Applicable	%	.0%	%	33.3%	%	.0%	50.0%	25.0%
Average	51.0%	24.1%	15.0%	12.2%	11.0%	8.8%	22.0%	13.7%
Non-Hispanic Ethnicity	49.4%	22.6%	14.0%	11.4%	10.5%	8.2%	17.5%	12.8%
Hispanic (Ethnicity)	100.0%	29.7%	22.9%	14.0%	9.7%	2.7%	.0%	14.4%

Table 39.C.12
Loan Applications by Reason for Denial by Race/Ethnicity of Applicant
 39. Remainder of Stark County
 2004–2011 HMDA Data

Denial Reason	American Indian	Asian	Black	White	Not Available	Not Applicable	Total	Hispanic (Ethnicity)
Debt-to-Income Ratio	4	5	18	451	41	0	519	5
Employment History	0	0	1	67	3	0	71	3
Credit History	4	7	36	561	89	0	697	5
Collateral	2	1	19	399	41	0	462	2
Insufficient Cash	1	0	2	59	9	0	71	1
Unverifiable Information	0	3	8	94	14	0	119	0
Credit Application Incomplete	2	3	7	273	40	0	325	0
Mortgage Insurance Denied	0	0	1	4	0	0	5	0
Other	1	2	22	441	67	1	534	3
Missing	3	5	36	625	111	1	781	16
Total	17	26	150	2,974	415	2	3,584	35
% Missing	17.6%	19.2%	24.0%	21.0%	26.7%	50.0%	21.8%	45.7%

Table 39.C.13
Loan Applications by Income of Applicant: Originated and Denied
 39. Remainder of Stark County
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Loan Originated	25	13	8	10	17	8	9	8	98
	Application Denied	13	13	9	11	18	18	11	9	102
	Denial Rate	34.2%	50.0%	52.9%	52.4%	51.4%	69.2%	55.0%	52.9%	51.0%
\$15,001–\$30,000	Loan Originated	396	371	338	314	202	307	230	212	2,370
	Application Denied	127	149	124	73	78	68	77	58	754
	Denial Rate	24.3%	28.7%	26.8%	18.9%	27.9%	18.1%	25.1%	21.5%	24.1%
\$30,001–\$45,000	Loan Originated	907	937	882	673	517	547	444	407	5,314
	Application Denied	136	206	180	114	94	72	63	70	935
	Denial Rate	13.0%	18.0%	16.9%	14.5%	15.4%	11.6%	12.4%	14.7%	15.0%
\$45,001–\$60,000	Loan Originated	859	913	848	621	476	382	363	335	4,797
	Application Denied	101	144	121	96	71	54	39	40	666
	Denial Rate	10.5%	13.6%	12.5%	13.4%	13.0%	12.4%	9.7%	10.7%	12.2%
\$60,001–\$75,000	Loan Originated	580	627	552	424	307	284	271	219	3,264
	Application Denied	56	102	60	62	30	35	27	31	403
	Denial Rate	8.8%	14.0%	9.8%	12.8%	8.9%	11.0%	9.1%	12.4%	11.0%
Above \$75,000	Loan Originated	975	1,098	1,162	910	655	549	529	553	6,431
	Application Denied	75	105	127	93	71	47	50	49	617
	Denial Rate	7.1%	8.7%	9.9%	9.3%	9.8%	7.9%	8.6%	8.1%	8.8%
Data Missing	Loan Originated	106	85	88	36	15	15	19	16	380
	Application Denied	28	22	24	10	3	4	8	8	107
	Denial Rate	20.9%	20.6%	21.4%	21.7%	16.7%	21.1%	29.6%	33.3%	22.0%
Total	Loan Originated	3,848	4,044	3,878	2,988	2,189	2,092	1,865	1,750	22,654
	Application Denied	536	741	645	459	365	298	275	265	3,584
	Denial Rate	12.2%	15.5%	14.3%	13.3%	14.3%	12.5%	12.9%	13.2%	13.7%

Table 39.C.14
Loan Applications by Income and Race/Ethnicity of Applicant: Originated and Denied
 39. Remainder of Stark 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	12	3	7	25	0	49
	Application Denied	0	5	5	1	3	2	1	17
	Denial Rate	%	71.4%	29.4%	25.0%	30.0%	7.4%	100.0%	25.8%
Asian	Loan Originated	3	21	26	35	21	101	4	211
	Application Denied	0	8	3	6	1	7	1	26
	Denial Rate	.0%	27.6%	10.3%	14.6%	4.5%	6.5%	20.0%	11.0%
Black	Loan Originated	0	36	84	96	54	106	4	380
	Application Denied	2	15	30	34	20	41	8	150
	Denial Rate	100.0%	29.4%	26.3%	26.2%	27.0%	27.9%	66.7%	28.3%
White	Loan Originated	89	2,186	4,953	4,445	3,015	5,824	350	20,862
	Application Denied	89	639	800	553	340	487	66	2,974
	Denial Rate	50.0%	22.6%	13.9%	11.1%	10.1%	7.7%	15.9%	12.5%
Not Available	Loan Originated	6	124	239	216	167	373	21	1,146
	Application Denied	11	87	97	71	39	80	30	415
	Denial Rate	64.7%	41.2%	28.9%	24.7%	18.9%	17.7%	58.8%	26.6%
Not Applicable	Loan Originated	0	1	0	2	0	2	1	6
	Application Denied	0	0	0	1	0	0	1	2
	Denial Rate	%	.0%	%	33.3%	%	.0%	50.0%	25.0%
Total	Loan Originated	98	2,370	5,314	4,797	3,264	6,431	380	22,654
	Application Denied	102	754	935	666	403	617	107	3,584
	Denial Rate	51.0%	24.1%	15.0%	12.2%	11.0%	8.8%	22.0%	13.7%
Non-Hispanic Ethnicity	Loan Originated	90	2,178	4,937	4,458	3,024	5,882	339	20,908
	Application Denied	88	635	807	576	353	526	72	3,057
	Denial Rate	49.4%	22.6%	14.0%	11.4%	10.5%	8.2%	17.5%	12.8%
Hispanic (Ethnicity)	Loan Originated	0	26	37	37	28	73	7	208
	Application Denied	2	11	11	6	3	2	0	35
	Denial Rate	100.0%	29.7%	22.9%	14.0%	9.7%	2.7%	.0%	14.4%

PREDATORY LENDING

Table 39.C.15
Originated Owner-Occupied Loans by HAL Status
 39. Remainder of Stark County
 2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Other	3,461	3,091	3,105	2,676	1,944	1,956	1,855	1,742	19,830
HAL	387	953	773	312	245	136	10	8	2,824
Total	3,848	4,044	3,878	2,988	2,189	2,092	1,865	1,750	22,654
Percent HAL	10.1%	23.6%	19.9%	10.4%	11.2%	6.5%	.5%	.5%	12.5%

Table 39.C.16
Loans by Loan Purpose by HAL Status
 39. Remainder of Stark County
 2004–2011 HMDA Data

Loan Purpose		2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	Other	3,461	3,091	3,105	2,676	1,944	1,956	1,855	1,742	19,830
	HAL	387	953	773	312	245	136	10	8	2,824
	Percent HAL	10.1%	23.6%	19.9%	10.4%	11.2%	6.5%	.5%	.5%	12.5%
Home Improvement	Other	405	427	581	416	336	148	182	199	2,694
	HAL	125	178	184	132	79	42	27	17	784
	Percent HAL	23.6%	29.4%	24.1%	24.1%	19.0%	22.1%	12.9%	7.9%	22.5%
Refinancing	Other	4,924	3,487	2,922	2,426	1,957	4,013	4,181	3,564	27,474
	HAL	870	1,296	1,227	616	342	250	33	36	4,670
	Percent HAL	15.0%	27.1%	29.6%	20.2%	14.9%	5.9%	.8%	1.0%	14.5%
Total	Other	8,790	7,005	6,608	5,518	4,237	6,117	6,218	5,505	49,998
	HAL	1,382	2,427	2,184	1,060	245	136	10	8	8,278
	Percent HAL	13.6%	25.7%	24.8%	16.1%	13.6%	6.5%	1.1%	1.1%	14.2%

Table 39.C.17
HALs Originated by Race of Borrower
 39. Remainder of Stark County
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	1	2	0	0	0	2	0	0	5
Asian	1	9	5	6	2	1	0	0	24
Black	18	33	30	7	5	3	0	0	96
White	326	808	679	281	225	125	8	8	2,460
Not Available	41	101	59	18	13	5	2	0	239
Not Applicable	0	0	0	0	0	0	0	0	0
Total	387	953	773	312	245	136	10	8	2,824
Hispanic (Ethnicity)	11	10	4	2	1	2	0	0	30

Table 39.C.18
Rate of HALs Originated by Race/Ethnicity of Borrower
 39. Remainder of Stark County
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	25.0%	28.6%	.0%	.0%	.0%	15.4%	.0%	.0%	10.2%
Asian	2.5%	32.1%	12.2%	20.0%	9.5%	5.6%	.0%	.0%	11.4%
Black	26.5%	42.3%	50.0%	13.5%	13.2%	9.7%	.0%	.0%	25.3%
White	9.1%	22.0%	18.9%	10.1%	11.2%	6.4%	.5%	.5%	11.8%
Not Available	24.6%	39.8%	32.6%	15.4%	11.6%	5.6%	1.8%	.0%	20.9%
Not Applicable	.0%	%	%	.0%	.0%	%	%	%	0%
Average	10.1%	23.6%	19.9%	10.4%	11.2%	6.5%	0.5%	0.5%	12.5%
Non-Hispanic Ethnicity	9.5%	22.4%	19.6%	10.2%	11.1%	6.5%	.5%	.5%	12.1%
Hispanic (Ethnicity)	25.6%	26.3%	16.7%	10.0%	5.9%	9.5%	.0%	.0%	14.4%

Table 39.C.19
Loans by HAL Status by Race/Ethnicity of Borrower
 39. Remainder of Stark County
 2004–2011 HMDA Data

Race	Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Other	3	5	7	6	3	11	4	5	44
	HAL	1	2	0	0	0	2	0	0	5
	Percent HAL	25.0%	28.6%	.0%	.0%	.0%	15.4%	.0%	.0%	10.2%
Asian	Other	39	19	36	24	19	17	18	15	187
	HAL	1	9	5	6	2	1	0	0	24
	Percent HAL	2.5%	32.1%	12.2%	20.0%	9.5%	5.6%	.0%	.0%	11.4%
Black	Other	50	45	30	45	33	28	20	33	284
	HAL	18	33	30	7	5	3	0	0	96
	Percent HAL	26.5%	42.3%	50.0%	13.5%	13.2%	9.7%	.0%	.0%	25.3%
White	Other	3,240	2,869	2,910	2,500	1,789	1,815	1,703	1,576	18,402
	HAL	326	808	679	281	225	125	8	8	2,460
	Percent HAL	9.1%	22.0%	18.9%	10.1%	11.2%	6.4%	0.5%	0.5%	11.8%
Not Available	Other	126	153	122	99	99	85	110	113	907
	HAL	41	101	59	18	13	5	2	0	239
	Percent HAL	24.6%	39.8%	32.6%	15.4%	11.6%	5.6%	1.8%	.0%	20.9%
Not Applicable	Other	3	0	0	2	1	0	0	0	6
	HAL	0	0	0	0	0	0	0	0	0
	Percent HAL	.0%	%	%	.0%	.0%	%	%	%	0.0%
Total	Other	3,461	3,091	3,105	2,676	1,944	1,956	1,855	1,742	19,830
	HAL	387	953	773	312	245	136	10	8	2,824
	Percent HAL	10.1%	23.6%	19.9%	10.4%	11.2%	6.5%	.5%	.5%	12.5%
Non-Hispanic Ethnicity	Other	3,002	2,888	2,944	2,564	1,826	1,837	1,710	1,612	18,383
	HAL	314	833	716	291	227	128	8	8	2,525
	Percent HAL	9.5%	22.4%	19.6%	10.2%	11.1%	6.5%	.5%	.5%	12.1%
Hispanic (Ethnicity)	Other	32	28	20	18	16	19	26	19	178
	HAL	11	10	4	2	1	2	0	0	30
	Percent HAL	25.6%	26.3%	16.7%	10.0%	5.9%	9.5%	.0%	.0%	14.4%

Table 39.C.20
Rates of HALs by Income of Borrower
 39. Remainder of Stark County
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Average
\$15,000 or Below	8.0%	15.4%	12.5%	20.0%	.0%	12.5%	.0%	.0%	8.2%
\$15,001–\$30,000	14.6%	31.3%	22.5%	13.7%	24.3%	7.2%	1.7%	1.4%	15.7%
\$30,001–\$45,000	11.8%	28.9%	23.8%	12.8%	11.6%	7.1%	.2%	.2%	14.6%
\$45,001–\$60,000	12.9%	25.6%	24.4%	11.6%	11.1%	8.1%	.3%	.6%	14.8%
\$60,001–\$75,000	7.4%	23.1%	20.3%	8.5%	9.1%	5.6%	.4%	.0%	11.7%
Above \$75,000	5.7%	15.6%	11.6%	7.1%	8.2%	4.9%	0.6%	.4%	8.0%
Data Missing	9.4%	16.5%	36.4%	22.2%	6.7%	.0%	.0%	.0%	17.1%
Average	10.1%	23.6%	19.9%	10.4%	11.2%	6.5%	.5%	.5%	12.5%

Table 39.C.21
Loans by HAL Status by Income of Borrower
 39. Remainder of Stark County
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Other	23	11	7	8	17	7	9	8	90
	HAL	2	2	1	2	0	1	0	0	8
	Percent HAL	8.0%	15.4%	12.5%	20.0%	.0%	12.5%	.0%	.0%	8.2%
\$15,001–\$30,000	Other	338	255	262	271	153	285	226	209	1,999
	HAL	58	116	76	43	49	22	4	3	371
	Percent HAL	14.6%	31.3%	22.5%	13.7%	24.3%	7.2%	1.7%	1.4%	15.7%
\$30,001–\$45,000	Other	800	666	672	587	457	508	443	406	4,539
	HAL	107	271	210	86	60	39	1	1	775
	Percent HAL	11.8%	28.9%	23.8%	12.8%	11.6%	7.1%	.2%	.2%	14.6%
\$45,001–\$60,000	Other	748	679	641	549	423	351	362	333	4,086
	HAL	111	234	207	72	53	31	1	2	711
	Percent HAL	12.9%	25.6%	24.4%	11.6%	11.1%	8.1%	.3%	.6%	14.8%
\$60,001–\$75,000	Other	537	482	440	388	279	268	270	219	2,883
	HAL	43	145	112	36	28	16	1	0	381
	Percent HAL	7.4%	23.1%	20.3%	8.5%	9.1%	5.6%	.4%	.0%	11.7%
Above \$75,000	Other	919	927	1,027	845	601	522	526	551	5,918
	HAL	56	171	135	65	54	27	3	2	513
	Percent HAL	5.7%	15.6%	11.6%	7.1%	8.2%	4.9%	.6%	.4%	8.0%
Data Missing	Other	96	71	56	28	14	15	19	16	315
	HAL	10	14	32	8	1	0	0	0	65
	Percent HAL	9.4%	16.5%	36.4%	22.2%	6.7%	.0%	.0%	.0%	17.1%
Total	Other	3,461	3,091	3,105	2,676	1,944	1,956	1,855	1,742	19,830
	HAL	387	953	773	312	245	136	10	8	2,824
	Percent HAL	10.1%	23.6%	19.9%	10.4%	11.2%	6.5%	.5%	.5%	12.5%

D. CRA DATA

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

Table 39.D.1
Small Business Loans Originated: \$100,000 or Less by Tract MFI
 39. Remainder of Stark 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	2,750	1,605		4,366
2001	0	9	2,745	1,746		4,500
2002	0	20	3,119	1,889		5,028
2003	0	40	3,118	1,827		4,985
2004	0	37	3,122	1,809		4,968
2005	0	48	3,579	2,116		5,743
2006	0	63	4,317	2,833		7,213
2007	0	88	4,898	3,118		8,104
2008	0	56	3,695	2,309		6,060
2009	0	22	1,404	1,027		2,453
2010	0	29	1,387	956		2,372
2011	0	27	1,854	1,262		3,143
Total	0	450	35,988	22,497	0	58,935
Loan Amount (\$1,000s)						
2000	0	234	37,321	23,949		61,504
2001	0	234	31,148	23,032		54,414
2002	0	132	34,602	23,228		57,962
2003	0	331	32,448	19,087		51,866
2004	0	497	31,954	20,883		53,334
2005	0	783	38,278	24,517		63,578
2006	0	901	44,556	32,475		77,932
2007	0	777	49,517	33,901		84,195
2008	0	392	36,026	23,242		59,660
2009	0	215	16,599	12,766		29,580
2010	0	525	19,842	13,540		33,907
2011	0	507	28,385	19,256		48,148
Total	0	5,528	400,676	269,876	0	676,080

Table 39.D.2
Small Business Loans Originated: \$100,001 to \$250,000 by Tract MFI
 39. Remainder of Stark 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	1	102	99		202
2001	0	4	104	86		194
2002	0	0	100	102		202
2003	0	1	95	88		184
2004	0	2	115	69		186
2005	0	3	114	64		181
2006	0	3	124	61		188
2007	0	0	68	52		120
2008	0	0	53	48		101
2009	0	0	49	50		99
2010	0	1	74	53		128
2011	0	3	78	61		142
Total	0	18	1,076	833	0	1,927
Loan Amount (\$1,000s)						
2000	0	250	17,632	16,895		34,777
2001	0	725	18,072	14,340		33,137
2002	0	0	17,254	17,157		34,411
2003	0	200	16,102	14,815		31,117
2004	0	350	20,130	11,714		32,194
2005	0	431	20,410	10,545		31,386
2006	0	600	21,069	10,844		32,513
2007	0	0	11,864	9,026		20,890
2008	0	0	8,751	8,569		17,320
2009	0	0	8,764	9,083		17,847
2010	0	200	12,338	9,058		21,596
2011	0	417	13,635	10,436		24,488
Total	0	3,173	186,021	142,482	0	331,676

Table 39.D.3
Small Business Loans Originated: More than \$250,000 by Tract MFI
 39. Remainder of Stark 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	1	89	87		177
2001	0	1	98	77		176
2002	0	3	124	119		246
2003	0	0	133	96		229
2004	0	0	139	130		269
2005	0	0	111	73		184
2006	0	0	118	85		203
2007	0	1	80	55		136
2008	0	1	57	40		98
2009	0	0	63	58		121
2010	0	0	80	70		150
2011	0	3	88	54		145
Total	0	10	1,180	944	0	2,134
Loan Amount (\$1,000s)						
2000	0	500	41,773	41,650		83,923
2001	0	1,000	49,931	34,980		85,911
2002	0	1,625	66,242	63,520		131,387
2003	0	0	70,678	52,000		122,678
2004	0	0	77,650	70,006		147,656
2005	0	0	63,317	38,424		101,741
2006	0	0	61,364	45,117		106,481
2007	0	402	45,866	31,063		77,331
2008	0	360	31,648	24,399		56,407
2009	0	0	33,965	32,305		66,270
2010	0	0	45,717	39,329		85,046
2011	0	1,013	44,247	30,017		75,277
Total	0	4,900	632,398	502,810	0	1,140,108

Table 39.D.4
Small Business Loans to Businesses with Gross Annual Revenues of Less Than \$1 Million by Tract MFI
 39. Remainder of Stark 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	7	970	646		1,623
2001	0	6	955	809		1,770
2002	0	2	787	623		1,412
2003	0	14	979	623		1,616
2004	0	16	1,006	578		1,600
2005	0	28	1,527	948		2,503
2006	0	34	1,696	1,059		2,789
2007	0	41	1,763	1,127		2,931
2008	0	18	1,125	644		1,787
2009	0	12	494	352		858
2010	0	11	511	328		850
2011	0	5	872	587		1,464
Total	0	194	12,685	8,324	0	21,203
Loan Amount (\$1,000s)						
2000	0	458	37,808	34,817		73,083
2001	0	680	38,114	37,094		75,888
2002	0	18	40,992	46,638		87,648
2003	0	256	48,025	38,360		86,641
2004	0	341	43,243	32,181		75,765
2005	0	651	43,270	29,333		73,254
2006	0	879	48,626	36,088		85,593
2007	0	512	32,865	29,640		63,017
2008	0	141	23,506	20,806		44,453
2009	0	156	13,626	16,942		30,724
2010	0	337	18,857	20,000		39,194
2011	0	88	30,091	19,230		49,409
Total	0	4,517	419,023	361,129	0	784,669

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 39.E.1
Fair Housing Complaints by Basis
 39. Remainder of Stark County
 2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability	1	1	9	2	1	0	2	3	3	22
Family Status	0	0	2	2	1	2	2	1	3	13
National Origin	1	0					0		0	1
Race	1	2	0	0	1	1	0	0	2	7
Sex			1		0	1	0	0	0	2
Total Bases	3	3	12	4	3	4	4	4	8	45
Total Complaints	3	3	11	3	3	4	4	4	7	42

Table 39.E.2
Fair Housing Complaints by Issue
 39. Remainder of Stark County
 2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Discriminatory refusal to rent	1	0	1	1	0	0	0	0	4	7
Discriminatory terms, conditions, privileges, or services and facilities	0	1	0	0	0	0	1	2	2	6
Otherwise deny or make housing available	0		0		1	0		2	2	5
Failure to make reasonable accommodation	1	1	0	1	1		1	0	0	5
Discriminatory advertisement - rental						2		1	1	4
Discrimination in terms, conditions or privileges relating to rental	1	0	0	0	1	0	1	0	0	3
Other discriminatory acts	0		1		0	0	0		2	3
Discriminatory acts under Section 818 (coercion, etc.)		1	1		0	1	0	0	0	3
Failure to provide accessible and usable public and common user areas		0	2							2
Non-compliance with design and construction requirements (handicap)			6					3	2	11
Discriminatory refusal to negotiate for rental			0	0			1	0		1
Discriminatory refusal to rent and negotiate for rental	0	0		1	0	0	0		0	1
Discriminatory advertising, statements, and notices				1	0	0	0		0	1
False denial or representation of availability - rental				0		1		0		1
Discrimination in the brokering of residential real property		1								1
Discrimination in services and facilities relating to rental	0		0			0	1		0	1
Failure to provide an accessible building entrance			1							1
Total Issues	3	4	12	4	3	4	5	8	13	56
Total Complaints	3	3	11	3	3	4	4	4	7	42

Table 39.E.3
Fair Housing Complaints by Closure Status
 39. Remainder of Stark County
 2004–2012 HUD Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Administrative Closure	0	0	0	0	1	1	0	1	0	3
Cause (FHAP)	1	1	8	0		0	1	0		11
Conciliated / Settled	2	1	0	2	0	1	2	1	2	11
No Cause	0	1	3	1	2	2	1	0		10
Open							0	2	5	7
Total Complaints	3	3	11	3	3	4	4	4	7	42

HUD Complaints Found With Cause

Table 39.E.4
Fair Housing Complaints Found With Cause by Basis
 39. Remainder of Stark County
 2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability	1	1	7	2	0	0	1	0		12
Family Status	0	0	1	1	0	1	2	1	1	7
National Origin	1	0					0			1
Race	1	1	0	0		0	0	0	1	3
Total Bases	3	2	8	3	0	1	3	1	2	23
Total Complaints	3	2	8	2	0	1	3	1	2	22

Table 39.E.5
Fair Housing Complaints Found With Cause by Issue
 39. Remainder of Stark County
 2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Non-compliance with design and construction requirements (handicap)			5							5
Discriminatory refusal to rent	1	0	1	0	0	0	0	0	2	4
Failure to make reasonable accommodation	1	1		1			1	0		4
Discriminatory advertisement - rental						1		1	1	3
Discrimination in terms, conditions or privileges relating to rental	1	0	0			0	1	0	0	2
Discriminatory refusal to negotiate for rental				0			1	0		1
Discriminatory refusal to rent and negotiate for rental	0			1		0	0			1
Discriminatory advertising, statements, and notices				1		0	0			1
Discriminatory terms, conditions, privileges, or services and facilities		1	0			0	0	0	0	1
Discrimination in services and facilities relating to rental						0	1			1
Discriminatory acts under Section 818 (coercion, etc.)		1			0	0	0	0	0	1
Failure to provide an accessible building entrance			1							1
Failure to provide accessible and usable public and common user areas		0	1							1
Total Issues	3	3	8	3	0	1	4	1	3	26
Total Complaints	3	2	8	2	0	1	3	1	2	22

OHIO CIVIL RIGHTS COMMISSION COMPLAINTS

Table 39.E.6
Fair Housing Complaints by Basis
 39. Remainder of Stark County
 2004–2012 OCRC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color	0		0		0	0	0		1	1
Disability	1	0	12	4	2	5	2	4		30
Family Status	0		3	0	1	2	2	1	0	9
Gender	1		3			1		2	0	7
National Origin		2	0		0	1	0	0	0	3
Race	0	5	3	0	1	0	0	0	1	11
Retaliation		2	2	1	0	0	0	1		6
Total Bases	2	9	23	5	4	10	4	8	2	67
Total Complaints	2	6	18	4	4	8	4	7	1	54

Table 39.E.7
Fair Housing Complaints by Issue
 39. Remainder of Stark County
 2004–2012 OCRC Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Advertising	0							2	0	2
Exclusion	0					1				1
Harassment	0		2				0	1		3
Intimidation			4	0	1	0	0	2	0	7
Other	1	4	3	1	1	1	0	2	1	14
Reasonable Accommodation	1	0	5			0	1	1		8
Sexual Harassment	1					1				2
Terms and Conditions	0	2	13	3	4	7	3	3	0	35
Total Issues	3	6	27	4	6	10	4	11	1	72
Total Complaints	2	6	18	4	4	8	4	7	1	54

Table 39.E.8
Fair Housing Complaints by Closure Status
 39. Remainder of Stark County
 2004–2012 OCRRC Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Administrative Closure					0	0	1	2		3
CP Failed to Cooperate				0		0	0	1	0	1
CP Withdrawal – No Benefit	0	1			1		0	0		2
No Cause Finding Issued	1	4	5	3	3	3	1	0		20
Open Charge Closed By Legal Activity			1			0				1
Settlement With Benefits	1		5	1		1	1	4	1	14
Successful Conciliation			4			3	0	0		7
Withdrawal With Benefits	0	1	3	0	0	1	1		0	6
Total Complaints	2	6	18	4	4	8	4	7	1	54

FAIR HOUSING CONTACT SERVICE COMPLAINTS

Table 39.E.9
Fair Housing Complaints by Basis
 39. Remainder of Stark County
 2004–2012 FHCS Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability			2	1	0	0	0	2	0	5
Familial Status			1	3	2	0		5	1	12
Race	1		1		1					3
Retaliation				1		0	0			1
Total Bases	1	0	4	5	3	0	0	7	1	21
Total Complaints	1		4	4	3	0	0	7	1	20

Table 39.E.10
Fair Housing Complaints by Closure Status
 39. Remainder of Stark County
 2004–2012 FHCS Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Closed				2	1		0			3
Elected not to pursue						0		1	0	1
Inquiry			1	1	0				0	2
Lack of jurisdiction					1					1
No contact							0	1		1
No probable cause			1	0	0	0				1
Pending			1			0		1	0	2
Probable cause						0	0	2	0	2
Settled			1			0	0	2	1	4
Settled through OCRRC					1					1
Missing	1			1						2
Total Complaints	1	0	4	4	3	0	0	7	1	20

F. FAIR HOUSING SURVEY FOR HOUSING STAKEHOLDERS DATA

No responses were received from the remainder of Stark County 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 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 Stark County that received and completed the survey.⁵⁵

Table 39.G.1
Housing Development
 39. Remainder of Stark 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"?	1	0	0	2	3
Guidelines that encourage development affordable housing units?	1	0	0	2	3
Any potential barriers to the development of low- to moderate- income housing?	1	0	0	2	3
Guidelines that allow the development of mixed use housing?	1	0	0	2	3
Any potential barriers to the development of mixed use housing?	1	0	0	2	3
Occupancy Standards					
A definition for the term "family"?	1	0	0	2	3
Residential occupancy standards or limits?	1	0	0	2	3
Special Needs Housing					
A definition for the term "disability"?	1	0	0	2	3
Development standards for making housing accessible to persons with disabilities?	1	0	0	2	3
A process by which persons with disabilities can request modification to the jurisdiction's policies?	1	0	0	2	3
Standards for the development of senior housing?	1	0	0	2	3
Guidelines that distinguish senior citizen housing from other residential uses?	0	0	1	2	3
Guidelines for developing housing for any other special needs populations?	1	0	0	2	3
Fair Housing Policies					
A fair housing ordinance, policy, or regulation?	1	0	0	2	3
Policies or practices for "affirmatively furthering fair housing"?	1	0	0	2	3

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 Stark 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.

⁵⁵ 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 Remainder of Stark 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 in the remainder of Stark County*

Results of the Fair Housing Surveys indicate that a number of local communities in the remainder of Stark County lack or do not have sufficient policies or practices that adequately address the duty to affirmatively further fair housing.

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 Stark 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 in the remainder of Stark County. 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 39.H.1
Impediments Matrix
 39. Remainder of Stark 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 ⁵⁶		
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	Lack of inclusionary policies							X		X	All	M

⁵⁶ 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.

40. SUMMIT COUNTY

A. CENSUS BUREAU DATA

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

Table 40.A.1

Population by Age

40. Summit County

2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00-10
	Population	% of Total	Population	% of Total	
Under 5	36,002	6.6%	31,524	5.8%	-12.4%
5 to 19	113,370	20.9%	107,309	19.8%	-5.3%
20 to 24	31,009	5.7%	34,111	6.3%	10.0%
25 to 34	72,667	13.4%	64,539	11.9%	-11.2%
35 to 54	165,780	30.5%	153,806	28.4%	-7.2%
55 to 64	47,499	8.7%	71,524	13.2%	50.6%
65 or Older	76,572	14.1%	78,968	14.6%	3.1%
Total	542,899	100.0%	541,781	100.0%	-2%

Table 40.A.2

Elderly Population by Age

40. Summit County

2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00-10
	Population	% of Total	Population	% of Total	
65 to 66	7,811	10.2%	9,358	11.9%	19.8%
67 to 69	11,642	15.2%	12,750	16.1%	9.5%
70 to 74	20,141	26.3%	17,348	22.0%	-13.9%
75 to 79	17,386	22.7%	14,523	18.4%	-16.5%
80 to 84	10,920	14.3%	12,811	16.2%	17.3%
85 or Older	8,672	11.3%	12,178	15.4%	40.4%
Total	76,572	100.0%	78,968	100.0%	3.1%

Table 40.A.3

Population by Race and Ethnicity

40. Summit County

2000 & 2010 Census SF1 Data

Race	2000 Census		2010 Census		% Change 00-10
	Population	% of Total	Population	% of Total	
White	453,336	83.5%	436,487	80.6%	-3.7%
Black	71,608	13.2%	78,120	14.4%	9.1%
American Indian	1,086	.2%	1,015	.2%	-6.5%
Asian	7,641	1.4%	11,885	2.2%	55.5%
Native Hawaiian/ Pacific Islander	100	.0%	133	.0%	33.0%
Other	1,590	.3%	2,602	.5%	63.6%
Two or More Races	7,538	1.4%	11,539	2.1%	53.1%
Total	542,899	100.0%	541,781	100.0%	-2%
Non-Hispanic	538,118	99.1%	533,121	98.4%	-.9%
Hispanic	4,781	.9%	8,660	1.6%	81.1%

Table 40.A.4
Disability by Age
 40. Summit 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%	0	.0%	0	.0%
5 to 17	3,191	6.8%	1,712	3.7%	4,903	5.3%
18 to 34	3,305	5.9%	3,422	6.0%	6,727	6.0%
35 to 64	12,396	11.4%	13,541	11.7%	25,937	11.6%
65 to 74	4,345	25.1%	5,231	24.6%	9,576	24.9%
75 or Older	7,010	48.8%	11,263	48.9%	18,273	48.9%
Total	30,247	11.7%	35,169	12.6%	65,416	12.2%

Table 40.A.5
Employment Status by Disability and Type: Age 18 to 64
 40. Summit County
 2010 Three-Year ACS Data

Disability Status	Population
Employed:	245,944
With a disability:	11,199
With a hearing difficulty	2,983
With a vision difficulty	1,484
With a cognitive difficulty	3,677
With an ambulatory difficulty	4,845
With a self-care difficulty	1,732
With an independent living difficulty	3,029
No disability	234,745
Unemployed:	26,448
With a disability:	3,437
With a hearing difficulty	564
With a vision difficulty	409
With a cognitive difficulty	1,803
With an ambulatory difficulty	1,116
With a self-care difficulty	485
With an independent living difficulty	1,215
No disability	23,011
Not in labor force:	64,459
With a disability:	18,028
With a hearing difficulty	2,223
With a vision difficulty	2,659
With a cognitive difficulty	8,364
With an ambulatory difficulty	11,490
With a self-care difficulty	5,209
With an independent living difficulty	9,934
No disability	46,431
Total	336,851

Table 40.A.6
Households by Income

40. Summit 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	32,780	15.0%	32,224	14.4%
\$15,000 to \$19,999	13,558	6.2%	11,782	5.3%
\$20,000 to \$24,999	14,407	6.6%	12,386	5.6%
\$25,000 to \$34,999	28,748	13.2%	25,104	11.3%
\$35,000 to \$49,999	36,205	16.6%	34,233	15.3%
\$50,000 to \$74,999	44,616	20.5%	42,398	19.0%
\$75,000 to \$99,999	22,854	10.5%	26,454	11.9%
\$100,000 or More	24,697	11.3%	38,541	17.3%
Total	217,865	100.0%	223,122	100.0%

Table 40.A.7
Poverty by Age

40. Summit 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	7,238	13.7%	8,969	12.2%
6 to 17	11,932	22.5%	15,844	21.5%
18 to 64	28,846	54.4%	42,926	58.2%
65 or Older	4,975	9.4%	5,980	8.1%
Total	52,991	100.0%	73,719	100.0%
Poverty Rate	9.9%	.	13.8%	.

Table 40.A.8
Households by Year Home Built

40. Summit 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	47,558	21.8%	44,488	19.9%
1940 to 1949	22,927	10.5%	18,125	8.1%
1950 to 1959	40,470	18.6%	39,502	17.7%
1960 to 1969	33,161	15.2%	30,013	13.5%
1970 to 1979	29,267	13.4%	28,738	12.9%
1980 to 1989	17,766	8.2%	18,418	8.3%
1990 to 1999	26,639	12.2%	25,819	11.6%
2000 to 2004	.	.	13,167	5.9%
2005 or Later	.	.	4,852	2.2%
Total	217,788	100.0%	223,122	100.0%

Table 40.A.9
Housing Units by Type

40. Summit 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	174,140	75.4%	187,069	76.6%
Duplex	12,438	5.4%	10,921	4.5%
Tri- or Four-Plex	8,603	3.7%	8,453	3.5%
Apartment	33,153	14.4%	35,530	14.5%
Mobile Home	2,525	1.1%	2,329	1.0%
Boat, RV, Van, Etc.	21	.0%	12	.0%
Total	230,880	100.0%	244,314	100.0%

Table 40.A.10
Housing Units by Tenure

40. Summit County
2000 & 2010 Census SF1 Data

Tenure	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
Occupied Housing Units	217,788	94.3%	222,781	90.9%	2.3%
Owner-Occupied	152,974	70.2%	151,134	67.8%	-1.2%
Renter-Occupied	64,814	29.8%	71,647	32.2%	10.5%
Vacant Housing Units	13,092	5.7%	22,328	9.1%	70.5%
Total Housing Units	230,880	100.0%	245,109	100.0%	6.2%

Table 40.A.11
Disposition of Vacant Housing Units

40. Summit County
2000 & 2010 Census SF1 Data

Disposition	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
For Rent	5,701	43.5%	7,830	35.1%	37.3%
For Sale	2,182	16.7%	3,819	17.1%	75.0%
Rented or Sold, Not Occupied	1,482	11.3%	1,161	5.2%	-21.7%
For Seasonal, Recreational, or Occasional Use	921	7.0%	1,146	5.1%	24.4%
For Migrant Workers	4	0.0%	2	.0%	-50.0%
Other Vacant	2,802	21.4%	8,370	37.5%	198.7%
Total	13,092	100.0%	22,328	100.0%	70.5%

Table 40.A.12
Households by Household Size

40. Summit County
2000 & 2010 Census SF1 Data

Size	2000 Census		2010 Census		% Change 00-10
	Households	% of Total	Households	% of Total	
One Person	60,913	28.0%	66,925	30.0%	9.9%
Two Persons	73,612	33.8%	75,584	33.9%	2.7%
Three Persons	35,047	16.1%	34,624	15.5%	-1.2%
Four Persons	29,616	13.6%	27,652	12.4%	-6.6%
Five Persons	12,706	5.8%	12,002	5.4%	-5.5%
Six Persons	4,014	1.8%	4,017	1.8%	.1%
Seven Persons or More	1,880	.9%	1,977	.9%	5.2%
Total	217,788	100.0%	222,781	100.0%	2.3%

Table 40.A.13
Household Type by Tenure
 40. Summit County
 2000 & 2010 Census SF1 Data

Household Type	2000 Census		2010 Census		% Change 00–10
	Households	% of Total	Households	% of Total	
Family Households	144,601	66.4%	141,110	63.3%	-2.4%
Married-Couple Family	109,183	75.5%	100,834	71.5%	-7.6%
Owner-Occupied	95,298	87.3%	87,906	87.2%	-7.8%
Renter-Occupied	13,885	12.7%	12,928	12.8%	-6.9%
Other Family	35,418	24.5%	40,276	28.5%	13.7%
Male Householder, No Spouse	7,878	22.2%	9,969	24.8%	26.5%
Owner-Occupied	4,963	63.0%	5,759	57.8%	16.0%
Renter-Occupied	2,915	37.0%	4,210	42.2%	44.4%
Female Householder, No Spouse	27,540	77.8%	30,307	75.2%	10.0%
Owner-Occupied	14,039	51.0%	14,204	46.9%	1.2%
Renter-Occupied	13,501	49.0%	16,103	53.1%	19.3%
Non-Family Households	73,187	33.6%	81,671	36.7%	11.6%
Owner-Occupied	38,674	52.8%	43,265	53.0%	11.9%
Renter-Occupied	34,513	47.2%	38,406	47.0%	11.3%
Total	217,788	100.0%	222,781	100.0%	2.3%

Table 40.A.14
Group Quarters Population
 40. Summit 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	1,157	20.0%	1,047	21.4%	-9.5%
Juvenile Facilities	.	.	81	1.7%	.
Nursing Homes	4,097	70.9%	3,574	73.1%	-12.8%
Other Institutions	521	9.0%	185	3.8%	-64.5%
Total	5,775	100.0%	4,887	100.0%	-15.4%
Noninstitutionalized					
College Dormitories	1,634	48.5%	2,574	50.7%	57.5%
Military Quarters	0	.0%	0	.0%	%
Other Noninstitutional	1,735	51.5%	2,506	49.3%	44.4%
Total	3,369	36.8%	5,080	51.0%	50.8%
Total Group Quarters Population	9,144	100.0%	9,967	100.0%	9.0%

Table 40.A.15
Overcrowding and Severe Overcrowding
 40. Summit 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	151,887	99.3%	887	.6%	222	.1%	152,996
2010 ACS	154,327	99.5%	598	.4%	121	.1%	155,046
Renter							
2000 Census	62,944	97.1%	1,209	1.9%	639	1.0%	64,792
2010 ACS	66,804	98.1%	1,021	1.5%	251	.4%	68,076
Total							
2000 Census	214,831	98.6%	2,096	1.0%	861	.4%	217,788
2010 ACS	221,131	99.1%	1,619	.7%	372	.2%	223,122

Table 40.A.16
Households with Incomplete Plumbing Facilities
 40. Summit County
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Plumbing Facilities	217,091	222,422
Lacking Complete Plumbing Facilities	697	700
Total Households	217,788	223,122
Percent Lacking	.3%	.3%

Table 40.A.17
Households with Incomplete Kitchen Facilities
 40. Summit County
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Kitchen Facilities	216,658	221,714
Lacking Complete Kitchen Facilities	1,130	1,408
Total Households	217,788	223,122
Percent Lacking	.5%	.6%

Table 40.A.18
Cost Burden and Severe Cost Burden by Tenure
 40. Summit 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	75,623	75.7%	16,322	16.3%	7,639	7.6%	277	.3%	99,861
2010 ACS	73,479	67.6%	23,002	21.1%	12,002	11.0%	290	.3%	108,773
Owner Without a Mortgage									
2000 Census	38,009	89.2%	2,555	6.0%	1,461	3.4%	574	1.3%	42,599
2010 ACS	37,798	81.7%	5,042	10.9%	3,068	6.6%	365	.8%	46,273
Renter									
2000 Census	37,369	57.9%	12,489	19.4%	10,698	16.6%	3,944	6.1%	64,500
2010 ACS	31,388	46.1%	14,800	21.7%	16,919	24.9%	4,969	7.3%	68,076
Total									
2000 Census	151,001	73.0%	31,366	15.2%	19,798	9.6%	4,795	2.3%	206,960
2010 ACS	142,665	63.9%	42,844	19.2%	31,989	14.3%	5,624	2.5%	223,122

Table 40.A.19
Median Housing Costs
 40. Summit County
 2000 Census SF3 & 2010 Five-Year ACS Data

Housing Cost	2000 Census	2010 ACS
Median Contract Rent	\$456	\$571
Median Home Value	\$109,100	\$141,200

B. BEA DATA

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

Table 40.B.1
Employment by Industry
 40. Summit County
 Select Years 2001–2010 BEA Data

NAICS Categories	2001	2005	2006	2007	2008	2009	2010	% Change 01–10
Farm employment	443	404	410	421	382	390	385	-13.1%
Forestry, fishing, related activities, and other	(D) ⁵⁷	(D)	140	143	166	150	149	.
Mining	(D)	(D)	665	731	822	780	798	.
Utilities	2,025	1,212	1,264	1,287	1,304	1,309	1,194	-41.0%
Construction	16,344	16,939	17,603	17,280	16,183	15,032	14,362	-12.1%
Manufacturing	40,039	37,436	36,785	37,201	35,224	29,811	29,220	-27.0%
Wholesale trade	15,228	15,992	16,207	16,377	16,177	15,203	15,473	1.6%
Retail trade	39,248	38,985	38,820	38,758	37,896	34,749	34,421	-12.3%
Transportation and warehousing	10,326	10,712	11,165	11,295	10,825	10,042	9,836	-4.7%
Information	5,029	4,857	4,980	5,057	4,936	4,752	4,532	-9.9%
Finance and insurance	12,736	13,348	13,230	13,367	13,920	14,545	14,916	17.1%
Real estate and rental and leasing	10,344	11,773	11,509	11,372	10,999	10,812	10,647	2.9%
Professional and technical services	17,212	18,303	19,298	20,420	20,615	19,897	19,909	15.7%
Management of companies and enterprises	9,244	13,443	13,442	13,190	14,660	13,908	13,457	45.6%
Administrative and waste services	21,039	22,972	25,082	25,851	25,991	22,928	23,330	10.9%
Educational services	4,170	5,556	5,691	5,620	5,787	5,840	6,066	45.5%
Health care and social assistance	36,186	40,410	41,615	43,091	44,702	45,367	45,968	27.0%
Arts, entertainment, and recreation	5,677	6,298	6,235	6,540	6,647	6,586	6,491	14.3%
Accommodation and food services	21,489	22,929	22,805	22,804	22,705	21,709	21,922	2.0%
Other services, except public administration	17,198	17,339	17,250	17,350	17,560	17,258	16,983	-1.3%
Government and government enterprises	35,200	35,026	34,900	35,494	36,103	36,056	35,378	.5%
Total	320,076	334,676	339,096	343,649	343,604	327,124	325,437	1.7%

⁵⁷ (D): These data are not shown to avoid disclosure of confidential information, but estimates are included in the totals.

Table 40.B.2
Real Earnings by Industry
 40. Summit County

Select Years 2001–2010 BEA Data, Real 2011 Dollars

NAICS Categories	2001	2005	2006	2007	2008	2009	2010	% Change 00–10
Farm earnings	4,772	4,972	2,472	3,550	3,486	4,486	2,307	-51.6%
Forestry, fishing, related activities, and other	(D) ⁵⁸	(D)	1,822	1,745	1,425	1,025	958	.
Mining	(D)	(D)	54,492	49,448	28,369	10,199	6,932	.
Utilities	177,659	161,214	155,033	152,244	169,735	169,482	146,099	-17.8%
Construction	921,531	878,339	936,722	869,685	810,690	729,473	728,919	-20.9%
Manufacturing	2,665,135	2,694,262	2,663,225	2,629,761	2,581,941	2,201,346	2,464,514	-7.5%
Wholesale trade	1,017,635	1,184,782	1,226,434	1,236,932	1,232,507	1,081,394	1,128,141	10.9%
Retail trade	1,222,646	1,262,045	1,227,373	1,201,272	1,158,159	1,039,654	1,053,165	-13.9%
Transportation and warehousing	592,562	597,737	597,608	598,086	582,759	497,798	510,703	-13.8%
Information	292,845	296,204	308,560	303,856	290,918	278,897	259,897	-11.3%
Finance and insurance	837,758	766,290	809,153	751,675	685,956	716,269	718,266	-14.3%
Real estate and rental and leasing	213,812	221,017	191,788	160,365	187,656	207,118	188,414	-11.9%
Professional and technical services	892,648	1,045,003	1,110,738	1,149,927	1,237,951	1,193,518	1,231,879	38.0%
Management of companies and enterprises	892,277	1,326,062	1,339,116	1,473,531	1,556,760	1,470,361	1,553,091	74.1%
Administrative and waste services	594,425	631,220	704,763	775,308	837,331	792,448	782,954	31.7%
Educational services	99,394	131,926	140,256	137,175	146,528	149,710	152,296	53.2%
Health care and social assistance	1,872,809	2,082,722	2,114,774	2,146,117	2,287,773	2,322,651	2,357,391	25.9%
Arts, entertainment, and recreation	121,235	111,070	112,742	106,076	93,278	88,327	86,328	-28.8%
Accommodation and food services	395,095	398,431	390,307	407,309	395,639	382,961	405,304	2.6%
Other services, except public administration	533,485	521,743	509,689	511,874	512,948	503,781	512,465	-3.9%
Government and government enterprises	1,892,654	2,040,054	1,961,360	1,951,009	1,996,741	2,051,513	2,023,758	6.9%
Total	15,276,643	16,406,986	16,558,428	16,616,945	16,798,549	15,892,410	16,313,782	6.8%

⁵⁸ (D): These data are not shown to avoid disclosure of confidential information, but estimates are included in the totals.

Table 40.B.3
Real Earnings Per Job by Industry
 40. Summit 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	10,771	12,307	6,029	8,433	9,126	11,502	5,993	-44.4%
Forestry, fishing, related activities, and other	(D) ⁵⁹	(D)	13,013	12,201	8,585	6,832	6,430	.
Mining	(D)	(D)	81,944	67,644	34,512	13,075	8,687	.
Utilities	87,733	133,015	122,653	118,294	130,165	129,474	122,361	39.5%
Construction	56,383	51,853	53,214	50,329	50,095	48,528	50,753	-10.0%
Manufacturing	66,563	71,970	72,400	70,691	73,301	73,843	84,343	26.7%
Wholesale trade	66,827	74,086	75,673	75,529	76,189	71,130	72,910	9.1%
Retail trade	31,152	32,373	31,617	30,994	30,562	29,919	30,597	-1.8%
Transportation and warehousing	57,385	55,801	53,525	52,951	53,835	49,572	51,922	-9.5%
Information	58,231	60,985	61,960	60,086	58,938	58,690	57,347	-1.5%
Finance and insurance	65,779	57,409	61,160	56,234	49,278	49,245	48,154	-26.8%
Real estate and rental and leasing	20,670	18,773	16,664	14,102	17,061	19,156	17,696	-14.4%
Professional and technical services	51,862	57,095	57,557	56,314	60,051	59,985	61,875	19.3%
Management of companies and enterprises	96,525	98,643	99,622	111,716	106,191	105,721	115,411	19.6%
Administrative and waste services	28,253	27,478	28,098	29,991	32,216	34,562	33,560	18.8%
Educational services	23,836	23,745	24,645	24,408	25,320	25,635	25,106	5.3%
Health care and social assistance	51,755	51,540	50,818	49,804	51,178	51,197	51,283	-.9%
Arts, entertainment, and recreation	21,356	17,636	18,082	16,219	14,033	13,411	13,300	-37.7%
Accommodation and food services	18,386	17,377	17,115	17,861	17,425	17,641	18,488	.6%
Other services, except public administration	31,020	30,091	29,547	29,503	29,211	29,191	30,175	-2.7%
Government and government enterprises	53,769	58,244	56,199	54,967	55,307	56,898	57,204	6.4%
Average	47,729	49,023	48,832	48,354	48,889	48,583	50,129	5.03%

⁵⁹ (D): These data are not shown to avoid disclosure of confidential information, but estimates are included in the totals.

Table 40.B.4
Total Employment and Real Personal Income
 40. Summit 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	9,816,183	695,548	-149,337	1,313,255	758,934	11,043,487	19,962	243,524	40,311
1970	9,625,326	668,331	-187,834	1,350,700	840,734	10,960,595	19,833	241,897	39,791
1971	9,582,864	683,116	-214,886	1,375,779	932,365	10,993,005	19,971	238,117	40,245
1972	10,128,525	764,631	-263,273	1,399,345	995,703	11,495,670	20,999	245,521	41,254
1973	10,526,662	917,678	-247,677	1,424,587	1,115,467	11,901,362	21,841	252,818	41,636
1974	10,355,470	928,533	-225,160	1,470,694	1,201,630	11,874,101	22,085	255,508	40,528
1975	9,605,066	828,803	-167,229	1,429,970	1,399,067	11,438,071	21,177	245,520	39,120
1976	9,703,483	851,856	-80,826	1,438,819	1,415,482	11,625,102	21,760	243,382	39,869
1977	10,427,619	918,130	-105,353	1,496,087	1,372,255	12,272,478	23,210	254,695	40,942
1978	10,805,351	983,554	-72,113	1,577,286	1,375,934	12,702,905	24,239	260,622	41,459
1979	10,835,622	1,024,830	-34,662	1,665,662	1,429,516	12,871,308	24,464	261,455	41,443
1980	10,446,506	978,753	-21,227	1,859,670	1,608,514	12,914,710	24,643	254,441	41,057
1981	10,240,513	1,027,614	-13,429	2,105,520	1,668,163	12,973,153	24,882	251,342	40,742
1982	9,793,770	991,912	-15,890	2,246,857	1,773,962	12,806,786	24,723	244,089	40,125
1983	9,864,434	1,020,841	-33,614	2,356,553	1,830,602	12,997,134	25,206	240,049	41,094
1984	10,312,029	1,097,277	-9,487	2,577,127	1,821,952	13,604,343	26,481	248,074	41,568
1985	10,552,513	1,139,912	3,269	2,666,489	1,892,835	13,975,194	27,375	254,434	41,474
1986	10,840,392	1,206,098	-27,650	2,712,722	1,951,391	14,270,757	28,092	258,652	41,912
1987	11,005,562	1,222,536	31,358	2,690,183	1,993,075	14,497,642	28,507	264,206	41,655
1988	11,306,158	1,293,860	69,172	2,765,600	2,029,667	14,876,737	29,073	270,655	41,773
1989	11,635,270	1,343,231	89,419	3,105,797	2,104,860	15,592,114	30,372	276,895	42,021
1990	11,658,219	1,374,258	126,553	3,084,250	2,282,617	15,777,381	30,583	280,070	41,627
1991	11,600,056	1,396,313	96,900	2,998,821	2,341,405	15,640,870	30,049	279,850	41,451
1992	12,090,080	1,457,180	111,052	3,005,737	2,493,249	16,242,939	30,987	281,904	42,887
1993	12,502,101	1,518,907	-1,284	2,972,236	2,570,082	16,524,227	31,273	290,137	43,090
1994	12,992,997	1,603,400	3,769	3,124,610	2,653,707	17,171,683	32,304	300,954	43,173
1995	13,276,088	1,646,871	48,337	3,406,837	2,758,943	17,843,333	33,399	307,866	43,123
1996	13,688,988	1,687,692	119,224	3,494,898	2,807,889	18,423,306	34,246	313,184	43,709
1997	13,984,001	1,679,165	278,344	3,712,764	2,842,638	19,138,583	35,475	316,774	44,145
1998	14,766,158	1,714,408	375,512	3,987,317	2,840,435	20,255,014	37,464	315,919	46,740
1999	15,063,600	1,726,551	649,870	3,831,589	2,889,510	20,708,018	38,225	322,472	46,713
2000	15,553,200	1,712,335	663,254	3,993,706	3,000,929	21,498,755	39,560	324,529	47,925
2001	15,276,643	1,658,346	646,075	3,635,190	3,181,242	21,080,804	38,712	320,076	47,729
2002	15,603,028	1,660,497	481,793	3,325,904	3,327,248	21,077,476	38,683	320,797	48,638
2003	16,070,158	1,715,967	385,999	3,249,289	3,407,191	21,396,670	39,249	321,112	50,046
2004	16,394,086	1,794,734	361,949	3,028,374	3,455,912	21,445,587	39,347	327,673	50,031
2005	16,406,986	1,806,463	275,418	3,127,504	3,511,053	21,514,499	39,475	334,676	49,023
2006	16,558,428	1,840,131	210,223	3,422,725	3,598,204	21,949,449	40,299	339,096	48,832
2007	16,616,945	1,853,645	81,697	3,760,417	3,711,845	22,317,259	41,003	343,649	48,354
2008	16,798,549	1,910,808	-85,996	3,937,951	3,902,656	22,642,352	41,690	343,604	48,889
2009	15,892,410	1,833,176	-25,625	3,136,865	4,363,086	21,533,560	39,720	327,124	48,583
2010	16,313,782	1,852,208	4,203	3,164,830	4,493,658	22,124,264	40,858	325,437	50,129

C. BLS DATA

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

Table 40.C.1
Labor Force Statistics
 40. Summit County
 1990–2011 BLS Data

Year	Labor Force	Employment	Unemployment	Unemployment Rate	Statewide Unemployment Rate
1990	257,517	244,379	13,138	5.1%	5.7%
1991	260,872	245,191	15,681	6.0%	6.6%
1992	265,886	247,594	18,292	6.9%	7.4%
1993	267,524	251,118	16,406	6.1%	6.7%
1994	273,048	259,324	13,724	5.0%	5.6%
1995	275,503	262,854	12,649	4.6%	4.9%
1996	279,020	265,752	13,268	4.8%	5.0%
1997	280,045	267,393	12,652	4.5%	4.6%
1998	278,142	266,647	11,495	4.1%	4.3%
1999	280,530	268,527	12,003	4.3%	4.3%
2000	280,321	268,698	11,623	4.1%	4.0%
2001	280,332	267,498	12,834	4.6%	4.4%
2002	280,966	264,186	16,780	6.0%	5.7%
2003	283,518	266,079	17,439	6.2%	6.2%
2004	285,913	268,665	17,248	6.0%	6.1%
2005	289,779	273,218	16,561	5.7%	5.9%
2006	293,314	278,029	15,285	5.2%	5.4%
2007	294,403	278,596	15,807	5.4%	5.6%
2008	296,217	278,132	18,085	6.1%	6.5%
2009	293,083	264,471	28,612	9.8%	10.1%
2010	287,960	259,316	28,644	9.9%	10.0%
2011	283,054	259,018	24,036	8.5%	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.⁶⁰ The information presented in this section presents detailed HMDA data, including denial rates and predatory lending including high annual percentage rate (APR) loans.

Table 40.D.1
Purpose of Loan by Year
40. Summit County
2004–2011 HMDA Data

Purpose	2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	18,826	22,337	20,284	13,548	9,237	8,947	7,606	7,139	107,924
Home Improvement	3,863	4,840	4,336	3,535	2,720	1,517	988	1,045	22,844
Refinancing	36,684	34,783	30,072	20,839	13,519	18,567	17,562	14,466	186,492
Total	59,373	61,960	54,692	37,922	25,476	29,031	26,156	22,650	317,260

Table 40.D.2
Occupancy Status for Home Purchase Loan Applications
40. Summit County
2004–2011 HMDA Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	Total
Owner-Occupied	16,550	19,457	17,528	11,898	8,481	8,603	7,260	6,754	96,531
Not Owner-Occupied	2,132	2,760	2,672	1,541	724	330	344	372	10,875
Not Applicable	144	120	84	109	32	14	2	13	518
Total	18,826	22,337	20,284	13,548	9,237	8,947	7,606	7,139	107,924

Table 40.D.3
Owner-Occupied Home Purchase Loan Applications by Loan Type
40. Summit County
2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Conventional	14,683	17,580	15,935	10,309	4,705	3,299	2,939	3,214	72,664
FHA - Insured	1,658	1,640	1,368	1,372	3,502	4,974	3,979	3,183	21,676
VA - Guaranteed	208	236	224	217	273	329	340	355	2,182
Rural Housing Service or Farm Service Agency	1	1	1	0	1	1	2	2	9
Total	16,550	19,457	17,528	11,898	8,481	8,603	7,260	6,754	96,531

⁶⁰ 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 40.D.4
Loan Applications by Action Taken
 40. Summit County
 2004–2011 HMDA Data

Action	2004	2005	2006	2007	2008	2009	2010	2011	Total
Loan Originated	9,488	10,465	9,111	6,489	4,614	4,311	3,741	3,347	51,566
Application Approved but not Accepted	1,069	1,147	1,060	569	320	204	218	154	4,741
Application Denied	1,477	2,044	1,930	1,200	734	551	482	469	8,887
Application Withdrawn by Applicant	1,045	1,594	1,048	560	422	389	379	352	5,789
File Closed for Incompleteness	292	346	280	170	106	88	57	48	1,387
Loan Purchased by the Institution	3,179	3,839	4,096	2,907	2,283	3,059	2,383	2,384	24,130
Preapproval Request Denied	0	20	3	3	2	0	0	0	28
Preapproval Approved but not Accepted	0	2	0	0	0	1	0	0	3
Total	16,550	19,457	17,528	11,898	8,481	8,603	7,260	6,754	96,531
Denial Rate	13.5%	16.3%	17.5%	15.6%	13.7%	11.3%	11.4%	12.3%	14.7%

Table 40.D.5
Denial Rates by Gender of Applicant
 40. Summit County
 2004–2011 HMDA Data

Year	Male	Female	Not Available	Not Applicable	Average
2004	11.9%	14.5%	42.8%	.0%	13.5%
2005	14.3%	18.9%	33.1%	%	16.3%
2006	14.7%	20.9%	35.6%	.0%	17.5%
2007	13.9%	17.4%	34.6%	.0%	15.6%
2008	12.7%	14.1%	30.8%	.0%	13.7%
2009	11.0%	11.1%	20.5%	%	11.3%
2010	10.7%	11.6%	21.7%	100.0%	11.4%
2011	12.1%	11.1%	21.1%	%	12.3%
Average	13.1%	16.3%	31.8%	9.1%	14.7%

Table 40.D.6
Loan Applications by Selected Action Taken by Gender of Applicant
 40. Summit County
 2004–2011 HMDA Data

Gender		2004	2005	2006	2007	2008	2009	2010	2011	Total
Male	Originated	6,593	7,021	5,935	4,414	3,035	2,773	2,450	2,155	34,376
	Denied	889	1,170	1,022	715	442	343	293	296	5,170
	Denial Rate	11.9%	14.3%	14.7%	13.9%	12.7%	11.0%	10.7%	12.1%	13.1%
Female	Originated	2,723	3,175	2,938	1,921	1,460	1,414	1,165	1,024	15,820
	Denied	461	741	778	405	240	176	153	128	3,082
	Denial Rate	14.5%	18.9%	20.9%	17.4%	14.1%	11.1%	11.6%	11.1%	16.3%
Not Available	Originated	170	269	235	151	117	124	126	168	1,360
	Denied	127	133	130	80	52	32	35	45	634
	Denial Rate	42.8%	33.1%	35.6%	34.6%	30.8%	20.5%	21.7%	21.1%	31.8%
Not Applicable	Originated	2	0	3	3	2	0	0	0	10
	Denied	0	0	0	0	0	0	1	0	1
	Denial Rate	.0%	%	.0%	.0%	.0%	%	100.0%	%	9.1%
Total	Originated	9,488	10,465	9,111	6,489	4,614	4,311	3,741	3,347	51,566
	Denied	1,477	2,044	1,930	1,200	734	551	482	469	8,887
	Denial Rate	13.5%	16.3%	17.5%	15.6%	13.7%	11.3%	11.4%	12.3%	14.7%

Table 40.D.7
Denial Rates by Race/Ethnicity of Applicant
 40. Summit County
 2004–2011 HMDA Data

Race/Ethnicity	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	15.0%	18.2%	39.1%	19.0%	50.0%	23.1%	22.2%	20.0%	25.6%
Asian	9.2%	12.4%	17.5%	11.1%	8.2%	15.7%	10.6%	13.0%	12.3%
Black	22.6%	27.8%	33.3%	35.7%	26.5%	19.2%	18.0%	24.7%	28.1%
White	10.9%	13.4%	13.4%	12.3%	11.9%	10.2%	10.3%	10.4%	12.0%
Not Available	35.5%	31.0%	34.8%	32.1%	25.5%	18.5%	21.7%	22.8%	30.2%
Not Applicable	28.6%	%	.0%	.0%	.0%	0%	0%	%	13.3%
Average	13.5%	16.3%	17.5%	15.6%	13.7%	11.3%	11.4%	12.3%	14.7%
Non-Hispanic	11.9%	14.8%	16.1%	14.3%	13.1%	10.8%	10.6%	11.3%	13.5%
Hispanic	19.4%	27.3%	23.0%	20.9%	1.8%	14.0%	21.8%	15.9%	20.2%

Table 40.D.8
Loan Applications by Selected Action Taken by Race/Ethnicity of Applicant
 40. Summit County
 2004–2011 HMDA Data

Race		2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Originated	17	18	14	17	6	10	7	4	93
	Denied	3	4	9	4	6	3	2	1	32
	Denial Rate	15.0%	18.2%	39.1%	19.0%	50.0%	22.2%	22.2%	20.0%	25.6%
Asian	Originated	226	205	198	152	134	107	101	100	1,223
	Denied	23	29	42	19	12	20	12	15	172
	Denial Rate	9.2%	12.4%	17.5%	11.1%	8.2%	15.7%	10.6%	13.0%	12.3%
Black	Originated	767	975	934	451	289	236	196	177	4,025
	Denied	224	375	466	250	104	56	43	58	1,576
	Denial Rate	22.6%	27.8%	33.3%	35.7%	26.5%	19.2%	18.0%	24.7%	28.1%
White	Originated	8,044	8,569	7,495	5,549	3,961	3,751	3,238	2,849	43,456
	Denied	989	1,323	1,164	777	536	425	370	331	5,915
	Denial Rate	10.9%	13.4%	13.4%	12.3%	11.9%	10.2%	10.3%	10.4%	12.0%
Not Available	Originated	429	698	467	317	222	207	199	217	2,756
	Denied	236	313	249	150	76	47	55	64	1,190
	Denial Rate	35.5%	31.0%	34.8%	32.1%	25.5%	18.5%	21.7%	22.8%	30.2%
Not Applicable	Originated	5	0	3	3	2	0	0	0	13
	Denied	2	0	0	0	0	0	0	0	2
	Denial Rate	35.5%	31.0%	34.8%	32.1%	25.5%	18.5%	21.7%	22.8%	13.3%
Total	Originated	9,488	10,465	9,111	6,489	4,614	4,311	3,741	3,347	51,566
	Denied	1,477	2,044	1,930	1,200	734	551	482	469	8,887
	Denial Rate	13.5%	16.3%	17.5%	15.6%	13.7%	11.3%	11.4%	12.3%	14.7%
Non-Hispanic	Originated	8,031	9,572	8,529	6,083	4,292	4,052	3,490	3,098	47,147
	Denied	1,087	1,669	1,638	1,014	648	490	415	395	7,356
	Denial Rate	11.9%	14.8%	16.1%	14.3%	13.1%	10.8%	10.6%	11.3%	13.5%
Hispanic	Originated	100	120	107	72	55	49	43	37	583
	Denied	24	45	32	19	1	8	12	7	148
	Denial Rate	19.4%	27.3%	23.0%	20.9%	1.8%	14.0%	21.8%	15.9%	20.2%

Table 40.D.9
Loan Applications by Reason for Denial
 40. Summit County
 2004–2011 HMDA Data

Denial Reason	2004	2005	2006	2007	2008	2009	2010	2011	Total
Debt-to-Income Ratio	185	238	218	183	124	115	111	74	1,248
Employment History	23	30	12	26	15	13	19	11	149
Credit History	319	401	351	243	151	111	98	101	1,775
Collateral	110	162	172	152	119	114	84	97	1,010
Insufficient Cash	32	32	31	17	15	12	16	13	168
Unverifiable Information	45	98	83	71	30	20	13	14	374
Credit Application Incomplete	117	164	115	111	77	32	44	75	735
Mortgage Insurance Denied	1	0	4	0	3	4	4	0	16
Other	316	554	342	138	58	42	44	33	1,527
Missing	329	365	602	259	142	88	49	51	1,885
Total	1,477	2,044	1,930	1,200	734	551	482	469	8,887

Table 40.D.10
Denial Rates by Income of Applicant
 40. Summit County
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	45.6%	52.9%	40.4%	57.1%	51.0%	47.8%	37.2%	38.5%	46.9%
\$15,001–\$30,000	24.4%	28.7%	28.1%	24.4%	21.9%	15.9%	18.1%	18.1%	24.3%
\$30,001–\$45,000	16.2%	18.5%	21.3%	17.6%	16.3%	11.4%	13.0%	12.6%	16.9%
\$45,001–\$60,000	12.2%	15.6%	16.9%	15.7%	13.5%	9.4%	8.2%	12.7%	13.8%
\$60,001–\$75,000	9.1%	11.2%	15.5%	13.8%	9.4%	10.3%	8.1%	11.2%	11.5%
Above \$75,000	6.9%	9.0%	10.4%	10.9%	9.1%	8.1%	9.0%	9.4%	9.2%
Data Missing	17.1%	21.5%	16.4%	15.7%	22.2%	32.7%	31.5%	22.4%	19.3%
Total	13.5%	16.3%	17.5%	15.6%	13.7%	11.3%	11.4%	12.3%	14.7%

Table 40.D.11
Denial Rates of Loans by Race/Ethnicity and Income of Applicant
 40. Summit County
 2004–2011 HMDA Data

Race	<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	Above \$75K	Data Missing	Average
American Indian	100.0%	50.0%	21.9%	25.9%	38.5%	6.9%	.0%	25.6%
Asian	83.3%	21.4%	21.9%	13.3%	8.7%	8.0%	7.7%	12.3%
Black	43.1%	35.4%	28.9%	26.4%	24.6%	22.3%	33.6%	28.1%
White	46.3%	19.8%	13.8%	11.5%	9.4%	7.6%	13.4%	12.0%
Not Available	50.9%	51.0%	35.1%	27.9%	21.6%	16.5%	52.2%	30.2%
Not Applicable	%	%	100.0%	%	%	.0%	.0%	13.3%
Average	46.9%	24.3%	16.9%	13.8%	11.5%	9.2%	19.3%	14.7%
Non-Hispanic Ethnicity	46.7%	22.1%	15.4%	13.0%	10.8%	8.6%	15.0%	13.5%
Hispanic (Ethnicity)	28.6%	27.5%	25.2%	17.7%	18.1%	16.1%	12.5%	20.2%

Table 40.D.12
Loan Applications by Reason for Denial by Race/Ethnicity of Applicant

40. Summit County
 2004–2011 HMDA Data

Denial Reason	American Indian	Asian	Black	White	Not Available	Not Applicable	Total	Hispanic (Ethnicity)
Debt-to-Income Ratio	4	38	207	884	115	0	1,248	30
Employment History	1	3	17	116	12	0	149	1
Credit History	5	29	307	1,213	221	0	1,775	36
Collateral	3	25	145	736	100	1	1,010	18
Insufficient Cash	1	4	30	109	24	0	168	2
Unverifiable Information	0	11	87	235	41	0	374	5
Credit Application Incomplete	2	13	98	521	101	0	735	8
Mortgage Insurance Denied	1	0	0	12	3	0	16	0
Other	5	21	291	963	246	1	1,527	24
Missing	10	28	394	1,126	327	0	1,885	24
Total	32	172	1,576	5,915	1,190	2	8,887	148
% Missing	31.3%	16.3%	25.0%	19.0%	27.5%	.0%	21.2%	16.2%

Table 40.D.13
Loan Applications by Income of Applicant: Originated and Denied

40. Summit County
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Loan Originated	43	48	65	24	24	35	27	16	282
	Application Denied	36	54	44	32	25	32	16	10	249
	Denial Rate	45.6%	52.9%	40.4%	57.1%	51.0%	47.8%	37.2%	38.5%	46.9%
\$15,001–\$30,000	Loan Originated	1,195	1,285	1,075	706	524	575	461	406	6,227
	Application Denied	385	518	420	228	147	109	102	90	1,999
	Denial Rate	24.4%	28.7%	28.1%	24.4%	21.9%	15.9%	18.1%	18.1%	24.3%
\$30,001–\$45,000	Loan Originated	2,115	2,416	1,957	1,353	1,047	1,089	785	655	11,417
	Application Denied	409	547	531	288	204	140	117	94	2,330
	Denial Rate	16.2%	18.5%	21.3%	17.6%	16.3%	11.4%	13.0%	12.6%	16.9%
\$45,001–\$60,000	Loan Originated	1,793	1,918	1,632	1,160	837	822	681	545	9,388
	Application Denied	249	354	332	216	131	85	61	79	1,507
	Denial Rate	12.2%	15.6%	16.9%	15.7%	13.5%	9.4%	8.2%	12.7%	13.8%
\$60,001–\$75,000	Loan Originated	1,241	1,357	1,077	802	547	506	430	420	6,380
	Application Denied	124	172	197	128	57	58	38	53	827
	Denial Rate	9.1%	11.2%	15.5%	13.8%	9.4%	10.3%	8.1%	11.2%	11.5%
Above \$75,000	Loan Originated	2,756	3,117	3,009	2,326	1,600	1,251	1,320	1,267	16,646
	Application Denied	203	310	348	286	160	111	131	132	1,681
	Denial Rate	6.9%	9.0%	10.4%	10.9%	9.1%	8.1%	9.0%	9.4%	9.2%
Data Missing	Loan Originated	345	324	296	118	35	33	37	38	1,226
	Application Denied	71	89	58	22	10	16	17	11	294
	Denial Rate	17.1%	21.5%	16.4%	15.7%	22.2%	32.7%	31.5%	22.4%	19.3%
Total	Loan Originated	9,488	10,465	9,111	6,489	4,614	4,311	3,741	3,347	51,566
	Application Denied	1,477	2,044	1,930	1,200	734	551	482	469	8,887
	Denial Rate	13.5%	16.3%	17.5%	15.6%	13.7%	11.3%	11.4%	12.3%	14.7%

Table 40.D.14
Loan Applications by Income and Race/Ethnicity of Applicant: Originated and Denied

40. Summit County
 2004–2011 HMDA Data

Race		<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	> \$75K	Data Missing	Total
American Indian	Loan Originated	0	10	25	20	8	27	3	93
	Application Denied	1	10	7	7	5	2	0	32
	Denial Rate	100.0%	50.0%	21.9%	25.9%	38.5%	6.9%	.0%	25.6%
Asian	Loan Originated	1	103	153	163	178	589	36	1,223
	Application Denied	5	28	43	25	17	51	3	172
	Denial Rate	83.3%	21.4%	21.9%	13.3%	8.7%	8.0%	7.7%	12.3%
Black	Loan Originated	37	738	1,050	701	465	963	71	4,025
	Application Denied	28	405	426	252	152	277	36	1,576
	Denial Rate	43.1%	35.4%	28.9%	26.4%	24.6%	22.3%	33.6%	28.1%
White	Loan Originated	218	5,091	9,621	8,059	5,406	14,037	1,024	43,456
	Application Denied	188	1,259	1,545	1,051	564	1,149	159	5,915
	Denial Rate	46.3%	19.8%	13.8%	11.5%	9.4%	7.6%	13.4%	12.0%
Not Available	Loan Originated	26	285	568	445	323	1,021	88	2,756
	Application Denied	27	297	307	172	89	202	96	1,190
	Denial Rate	50.9%	51.0%	35.1%	27.9%	21.6%	16.5%	52.2%	30.2%
Not Applicable	Loan Originated	0	0	0	0	0	9	4	13
	Application Denied	0	0	2	0	0	0	0	2
	Denial Rate	%	%	100.0%	%	%	.0%	.0%	13.3%
Total	Loan Originated	282	6,227	11,417	9,388	6,380	16,646	1,226	51,566
	Application Denied	249	1,999	2,330	1,507	827	1,681	294	8,887
	Denial Rate	46.9%	24.3%	16.9%	13.8%	11.5%	9.2%	19.3%	14.7%
Non-Hispanic Ethnicity	Loan Originated	248	5,730	10,573	8,616	5,859	15,044	1,077	47,147
	Application Denied	217	1,625	1,922	1,285	708	1,409	190	7,356
	Denial Rate	46.7%	22.1%	15.4%	13.0%	10.8%	8.6%	15.0%	13.5%
Hispanic (Ethnicity)	Loan Originated	5	79	113	116	68	188	14	583
	Application Denied	2	30	38	25	15	36	2	148
	Denial Rate	28.6%	27.5%	25.2%	17.7%	18.1%	16.1%	12.5%	20.2%

PREDATORY LENDING

Table 40.D.15
Originated Owner-Occupied Loans by HAL Status

40. Summit County
 2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Other	8,315	7,929	6,900	5,750	4,105	3,991	3,731	3,343	44,064
HAL	1,173	2,536	2,211	739	509	320	10	4	7,502
Total	9,488	10,465	9,111	6,489	4,614	4,311	3,741	3,347	51,566
Percent HAL	12.4%	24.2%	24.3%	11.4%	11.0%	7.4%	.3%	.1%	14.5%

Table 40.D.16
Loans by Loan Purpose by HAL Status
 40. Summit County
 2004–2011 HMDA Data

Loan Purpose		2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	Other	8,315	7,929	6,900	5,750	4,105	3,991	3,731	3,343	44,064
	HAL	1,173	2,536	2,211	739	509	320	10	4	7,502
	Percent HAL	12.4%	24.2%	24.3%	11.4%	11.0%	7.4%	.3%	.1%	14.5%
Home Improvement	Other	965	1,160	1,105	876	694	330	251	284	5,665
	HAL	313	408	374	274	137	72	34	19	1,631
	Percent HAL	24.5%	26.0%	25.3%	23.8%	16.5%	17.9%	11.9%	6.3%	22.4%
Refinancing	Other	10,114	7,063	5,745	4,766	3,707	7,835	8,337	6,668	54,235
	HAL	2,396	3,323	2,851	1,308	560	413	69	55	10,975
	Percent HAL	19.2%	32.0%	33.2%	21.5%	13.1%	5.0%	.8%	.8%	16.8%
Total	Other	19,394	16,152	13,750	11,392	8,506	12,156	12,319	10,295	103,964
	HAL	3,882	6,267	5,436	2,321	509	320	10	4	20,108
	Percent HAL	16.7%	28.0%	28.3%	16.9%	12.4%	6.2%	.9%	.8%	16.2%

Table 40.D.17
HALs Originated by Race of Borrower
 40. Summit County
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	2	3	2	4	0	0	0	0	11
Asian	11	15	18	9	14	7	0	0	74
Black	195	467	534	131	56	37	0	0	1,420
White	850	1,659	1,450	538	409	266	10	4	5,186
Not Available	115	392	205	57	30	10	0	0	809
Not Applicable	0	0	2	0	0	0	0	0	2
Total	1,173	2,536	2,211	739	509	320	10	4	7,502
Hispanic (Ethnicity)	15	43	32	11	8	3	0	0	112

Table 40.D.18
Rate of HALs Originated by Race/Ethnicity of Borrower
 40. Summit County
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	11.8%	16.7%	14.3%	23.5%	.0%	.0%	.0%	.0%	11.8%
Asian	4.9%	7.3%	9.1%	5.9%	10.4%	6.5%	.0%	.0%	6.1%
Black	25.4%	47.9%	57.2%	29.0%	19.4%	15.7%	.0%	.0%	35.3%
White	10.6%	19.4%	19.3%	9.7%	10.3%	7.1%	.3%	.1%	11.9%
Not Available	26.8%	56.2%	43.9%	18.0%	13.5%	4.8%	.0%	.0%	29.4%
Not Applicable	.0%	%	66.7%	.0%	.0%	%	%	%	15%
Average	12.4%	24.2%	24.3%	11.4%	11.0%	7.4%	0.3%	0.1%	14.5%
Non-Hispanic Ethnicity	12.1%	21.7%	23.2%	11.1%	10.6%	7.4%	.3%	.1%	13.7%
Hispanic (Ethnicity)	15.0%	35.8%	29.9%	15.3%	14.5%	6.1%	.0%	.0%	19.2%

Table 40.D.19
Loans by HAL Status by Race/Ethnicity of Borrower
 40. Summit County
 2004–2011 HMDA Data

Race	Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Other	15	15	12	13	6	10	7	4	82
	HAL	2	3	2	4	0	0	0	0	11
	Percent HAL	11.8%	16.7%	14.3%	23.5%	.0%	.0%	.0%	.0%	11.8%
Asian	Other	215	190	180	143	120	100	101	100	1,149
	HAL	11	15	18	9	14	7	0	0	74
	Percent HAL	4.9%	7.3%	9.1%	5.9%	10.4%	6.5%	.0%	.0%	6.1%
Black	Other	572	508	400	320	233	199	196	177	2,605
	HAL	195	467	534	131	56	37	0	0	1,420
	Percent HAL	25.4%	47.9%	57.2%	29.0%	19.4%	15.7%	.0%	.0%	35.3%
White	Other	7,194	6,910	6,045	5,011	3,552	3,485	3,228	2,845	38,270
	HAL	850	1,659	1,450	538	409	266	10	4	5,186
	Percent HAL	10.6%	19.4%	19.3%	9.7%	10.3%	7.1%	0.3%	0.1%	11.9%
Not Available	Other	314	306	262	260	192	197	199	217	1,947
	HAL	115	392	205	57	30	10	0	0	809
	Percent HAL	26.8%	56.2%	43.9%	18.0%	13.5%	4.8%	.0%	.0%	29.4%
Not Applicable	Other	5	0	1	3	2	0	0	0	11
	HAL	0	0	2	0	0	0	0	0	2
	Percent HAL	.0%	%	66.7%	.0%	.0%	%	%	%	15.0%
Total	Other	8,315	7,929	6,900	5,750	4,105	3,991	3,731	3,343	44,064
	HAL	1,173	2,536	2,211	739	509	320	10	4	7,502
	Percent HAL	12.4%	24.2%	24.3%	11.4%	11.0%	7.4%	.3%	.1%	14.5%
Non-Hispanic Ethnicity	Other	7,058	7,495	6,554	5,409	3,838	3,751	3,480	3,094	40,679
	HAL	973	2,077	1,975	674	454	301	10	4	6,468
	Percent HAL	12.1%	21.7%	23.2%	11.1%	10.6%	7.4%	.3%	.1%	13.7%
Hispanic (Ethnicity)	Other	85	77	75	61	47	46	43	37	471
	HAL	15	43	32	11	8	3	0	0	112
	Percent HAL	15.0%	35.8%	29.9%	15.3%	14.5%	6.1%	.0%	.0%	19.2%

Table 40.D.20
Rates of HALs by Income of Borrower
 40. Summit County
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Average
\$15,000 or Below	9.3%	20.8%	16.9%	20.8%	12.5%	17.1%	.0%	.0%	13.8%
\$15,001–\$30,000	21.2%	36.5%	39.1%	22.9%	18.9%	12.0%	.7%	.5%	23.7%
\$30,001–\$45,000	17.6%	35.0%	31.1%	14.6%	15.4%	10.1%	.1%	.2%	20.1%
\$45,001–\$60,000	13.7%	27.0%	27.5%	12.2%	11.0%	6.6%	.1%	.0%	16.0%
\$60,001–\$75,000	8.9%	21.0%	18.8%	10.5%	8.0%	4.7%	.5%	.2%	11.8%
Above \$75,000	5.9%	11.1%	14.1%	5.4%	6.8%	4.5%	0.2%	.0%	7.4%
Data Missing	7.2%	19.8%	33.1%	19.5%	2.9%	3.0%	.0%	.0%	17.3%
Average	12.4%	24.2%	24.3%	11.4%	11.0%	7.4%	.3%	.1%	14.5%

Table 40.D.21
Loans by HAL Status by Income of Borrower
 40. Summit County
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Other	39	38	54	19	21	29	27	16	243
	HAL	4	10	11	5	3	6	0	0	39
	Percent HAL	9.3%	20.8%	16.9%	20.8%	12.5%	17.1%	.0%	.0%	13.8%
\$15,001–\$30,000	Other	942	816	655	544	425	506	458	404	4,750
	HAL	253	469	420	162	99	69	3	2	1,477
	Percent HAL	21.2%	36.5%	39.1%	22.9%	18.9%	12.0%	.7%	.5%	23.7%
\$30,001–\$45,000	Other	1,742	1,570	1,348	1,155	886	979	784	654	9,118
	HAL	373	846	609	198	161	110	1	1	2,299
	Percent HAL	17.6%	35.0%	31.1%	14.6%	15.4%	10.1%	.1%	.2%	20.1%
\$45,001–\$60,000	Other	1,548	1,401	1,184	1,019	745	768	680	545	7,890
	HAL	245	517	448	141	92	54	1	0	1,498
	Percent HAL	13.7%	27.0%	27.5%	12.2%	11.0%	6.6%	.1%	.0%	16.0%
\$60,001–\$75,000	Other	1,130	1,072	875	718	503	482	428	419	5,627
	HAL	111	285	202	84	44	24	2	1	753
	Percent HAL	8.9%	21.0%	18.8%	10.5%	8.0%	4.7%	.5%	.2%	11.8%
Above \$75,000	Other	2,594	2,772	2,586	2,200	1,491	1,195	1,317	1,267	15,422
	HAL	162	345	423	126	109	56	3	0	1,224
	Percent HAL	5.9%	11.1%	14.1%	5.4%	6.8%	4.5%	.2%	.0%	7.4%
Data Missing	Other	320	260	198	95	34	32	37	38	1,014
	HAL	25	64	98	23	1	1	0	0	212
	Percent HAL	7.2%	19.8%	33.1%	19.5%	2.9%	3.0%	.0%	.0%	17.3%
Total	Other	8,315	7,929	6,900	5,750	4,105	3,991	3,731	3,343	44,064
	HAL	1,173	2,536	2,211	739	509	320	10	4	7,502
	Percent HAL	12.4%	24.2%	24.3%	11.4%	11.0%	7.4%	.3%	.1%	14.5%

E. CRA DATA

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

Table 40.E.1
Small Business Loans Originated: \$100,000 or Less by Tract MFI
 40. Summit 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	560	1,094	4,060	2,999		8,713
2001	737	1,313	4,576	3,025		9,651
2002	847	1,509	5,215	3,582		11,153
2003	1,177	1,652	4,493	4,521		11,843
2004	1,096	1,577	4,297	4,435		11,405
2005	1,051	1,598	4,695	4,912		12,256
2006	1,277	2,130	6,256	7,476		17,139
2007	1,368	2,226	6,750	8,167		18,511
2008	1,016	1,702	5,077	6,146		13,941
2009	484	669	2,200	2,786		6,139
2010	450	598	1,889	2,404		5,341
2011	522	786	2,417	3,099		6,824
Total	10,585	16,854	51,925	53,552	0	132,916
Loan Amount (\$1,000s)						
2000	8,448	17,026	54,149	39,477		119,100
2001	10,445	18,368	58,989	37,959		125,761
2002	10,620	17,494	60,717	42,291		131,122
2003	13,810	18,024	44,937	47,957		124,728
2004	13,456	18,104	45,053	50,333		126,946
2005	15,120	16,621	54,928	58,282		144,951
2006	13,371	23,236	63,479	77,226		177,312
2007	16,158	24,906	68,037	84,485		193,586
2008	11,178	18,010	49,705	64,747		143,640
2009	6,919	8,582	25,206	33,789		74,496
2010	6,500	8,751	25,595	34,318		75,164
2011	8,865	11,533	38,623	46,877		105,898
Total	134,890	200,655	589,418	617,741	0	1,542,704

Table 40.E.2
Small Business Loans Originated: \$100,001 to \$250,000 by Tract MFI
 40. Summit 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	52	54	168	140		414
2001	48	86	219	182		535
2002	53	63	248	174		538
2003	70	86	168	169		493
2004	62	91	171	188		512
2005	63	69	183	173		488
2006	75	78	182	195		530
2007	60	65	152	211		488
2008	38	46	109	125		318
2009	35	26	91	111		263
2010	35	49	119	175		378
2011	44	49	121	162		376
Total	635	762	1,931	2,005	0	5,333
Loan Amount (\$1,000s)						
2000	9,515	9,083	29,088	24,940		72,626
2001	8,249	14,701	38,786	32,544		94,280
2002	9,720	11,314	43,198	30,451		94,683
2003	12,832	15,298	28,922	30,939		87,991
2004	10,981	16,748	30,504	32,799		91,032
2005	11,308	11,679	33,858	31,886		88,731
2006	13,334	13,987	32,640	34,937		94,898
2007	11,255	11,365	27,034	37,890		87,544
2008	6,977	7,253	18,597	22,280		55,107
2009	6,349	4,511	16,357	19,893		47,110
2010	6,775	8,582	20,821	31,173		67,351
2011	8,211	8,856	21,770	28,680		67,517
Total	115,506	133,377	341,575	358,412	0	948,870

Table 40.E.3
Small Business Loans Originated: More than \$250,000 by Tract MFI
 40. Summit 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	35	32	122	138		327
2001	51	66	183	171		471
2002	68	57	260	234		619
2003	60	60	163	233		516
2004	71	79	159	215		524
2005	85	60	177	233		555
2006	66	81	178	215		540
2007	57	70	136	206		469
2008	58	43	92	194		387
2009	36	46	92	122		296
2010	63	51	109	166		389
2011	61	55	117	179		412
Total	711	700	1,788	2,306	0	5,505
Loan Amount (\$1,000s)						
2000	17,485	14,544	62,805	69,694		164,528
2001	26,981	34,694	97,404	89,412		248,491
2002	37,953	32,244	138,091	124,426		332,714
2003	32,185	29,008	85,020	123,301		269,514
2004	37,995	40,900	83,376	116,107		278,378
2005	45,955	32,157	93,174	127,582		298,868
2006	34,082	41,184	96,208	121,401		292,875
2007	34,431	39,059	70,446	107,181		251,117
2008	29,977	21,364	48,062	110,302		209,705
2009	18,546	26,613	49,457	67,540		162,156
2010	35,784	27,617	56,788	96,459		216,648
2011	32,828	27,867	62,321	99,958		222,974
Total	384,202	367,251	943,152	1,253,363	0	2,947,968

Table 40.E.4
Small Business Loans to Businesses with Gross Annual Revenues of Less Than
\$1 Million by Tract MFI
 40. Summit 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	202	470	1,785	1,149		3,606
2001	266	486	2,174	1,388		4,314
2002	218	396	1,511	1,170		3,295
2003	336	475	1,430	1,416		3,657
2004	350	457	1,421	1,472		3,700
2005	441	690	2,108	2,161		5,400
2006	397	774	2,468	2,614		6,253
2007	481	786	2,567	2,746		6,580
2008	293	516	1,559	1,738		4,106
2009	170	191	775	930		2,066
2010	147	200	718	761		1,826
2011	216	333	1,169	1,348		3,066
Total	3,517	5,774	19,685	18,893	0	47,869
Loan Amount (\$1,000s)						
2000	7,390	20,489	62,276	58,506		148,661
2001	11,977	16,922	83,941	65,326		178,166
2002	16,856	21,323	97,116	92,352		227,647
2003	16,137	21,044	57,468	79,533		174,182
2004	13,728	18,238	50,042	65,744		147,752
2005	16,746	18,534	64,765	80,266		180,311
2006	14,296	18,532	62,889	77,341		173,058
2007	13,971	18,289	60,753	70,897		163,910
2008	11,922	13,138	40,995	56,226		122,281
2009	11,418	7,138	24,049	33,910		76,515
2010	7,149	9,534	30,506	43,367		90,556
2011	10,681	14,290	42,472	41,357		108,800
Total	152,271	197,471	677,272	764,825	0	1,791,839

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 40.F.1
Fair Housing Complaints by Basis
 40. Summit County
 2004–2012 HUD Data

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

Table 40.F.2
Fair Housing Complaints by Issue
 40. Summit County
 2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Discrimination in making of loans	6	1					2			9
Non-compliance with design and construction requirements (handicap)	2		4	3						9
Failure to provide accessible and usable public and common user areas	2		3	1				3		9
Discriminatory refusal to rent	15	11	13	15	7	5	11	5	6	88
Discriminatory refusal to sell		3						1	3	7
Failure to provide an accessible route into and thru the covered unit	1	1	2	2				1		7
Otherwise deny or make housing available	2			1			1	1	1	6
Failure to permit reasonable modification		1	1					2	2	6
Discriminatory advertisement - rental	3		2			25	9	20		59
Other discriminatory acts	14	6	10	2	10	2	6	2	2	54
Discriminatory financing (includes real estate transactions)	1		1	1	1			1		5
Discrimination in the terms or conditions for making loans	2		1					2		5
Discrimination in terms, conditions, privileges relating to sale	1	1			1				2	5
Discriminatory refusal to rent and negotiate for rental	15	4	2	4	4	3		1	1	34
Discriminatory acts under Section 818 (coercion, etc.)	1	2	9	1		3	6	5	4	31
Discriminatory refusal to sell and negotiate for sale	1	1				1				3
Discrimination in terms and conditions of membership	2	1								3
Discriminatory advertising, statements, and notices	4	2	2	3	1	4	6	2	2	26
Discriminatory advertising - sale	2									2
Refusing to provide insurance	1				1					2
Restriction of choices relative to a rental	2									2
Failure to provide an accessible building entrance	1		1							2
Failure to provide usable kitchens and bathrooms	1	1								2
Discriminatory refusal to negotiate for rental	3		3			3	5	2		16
Discrimination in terms, conditions or privileges relating to rental	27	12	16	12	17	16	26	16	4	146
Failure to make reasonable accommodation	21	13	13	11	6	22	21	18	11	136
Discrimination in services and facilities relating to rental	2	2	3	2	2		1	1		13
False denial or representation of availability - rental	3		3		3	2	1			12
Discriminatory terms, conditions, privileges, or services and facilities	16	11	12	6	12	12	9	10	13	101
False denial or representation of availability									1	1
Discrimination in the appraising of residential real property				1						1
Steering	1									1
Refusing to provide municipal services or property				1						1
Using ordinances to discriminate in zoning and land use							1			1
Total Issues	152	73	101	66	65	98	105	93	52	805
Total Complaints	120	70	81	54	53	85	71	77	29	640

Table 40.F.3
Fair Housing Complaints by Closure Status
 40. Summit County
 2004–2012 HUD Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Administrative Closure	8	4	9	13	8	20	4	6	3	75
Cause (FHAP)	19	4	9	5	3	15	17	21		93
Charged (HUD)					1	1				2
Conciliated / Settled	42	34	37	17	14	20	26	19	6	215
DOJ Closure										
No Cause	51	28	26	19	27	29	23	23		226
Open							1	8	20	29
Total Complaints	120	70	81	54	53	85	71	77	29	640

HUD Complaints Found With Cause

Table 40.F.4
Fair Housing Complaints Found With Cause by Basis
 40. Summit County
 2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color			1	1						2
Disability	24	24	24	14	9	18	24	13	4	154
Family Status	11	4	5	8	7	16	17	19	1	88
National Origin	1		2	1		2		1		7
Race	23	7	14	4	3	9	3	6	1	70
Religion							1			1
Sex	7	6	6		1	7	4	1		32
Total Bases	66	41	52	28	20	52	49	40	6	354
Total Complaints	61	38	46	22	18	36	43	40	6	310

Table 40.F.5
Fair Housing Complaints Found With Cause by Issue
 40. Summit County
 2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Discriminatory refusal to negotiate for rental	2		2			3	2			9
False denial or representation of availability - rental	3		2		1	2	1			9
Failure to make reasonable accommodation	12	9	10	7	4	12	15	10	3	82
Non-compliance with design and construction requirements (handicap)	2		3	3						8
Discrimination in services and facilities relating to rental	1		3	1	1		1			7
Discrimination in terms, conditions or privileges relating to rental	12	7	6	3	5	6	17	7		63
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
Discriminatory terms, conditions, privileges, or services and facilities	5	5	7	3	5	5	5	6	3	44
Otherwise deny or make housing available	1			1				1	1	4
Discriminatory refusal to rent	7	6	5	5	1	1	9	3	1	38
Discriminatory advertisement - rental	2					8	7	16		33
Discriminatory refusal to sell		1						1	1	3
Discriminatory refusal to sell and negotiate for sale	1	1				1				3
Failure to permit reasonable modification		1	1					1		3
Other discriminatory acts	8	3	5	1		1	1	1	2	22
Discrimination in making of loans	2									2
Discrimination in the terms or conditions for making loans	1							1		2
Failure to provide an accessible building entrance	1		1							2
Failure to provide usable kitchens and bathrooms	1	1								2
Discriminatory refusal to rent and negotiate for rental	9	2		2	3	2				18
Discriminatory advertising, statements, and notices	2	1		2	1	4	3	2	1	16
Discriminatory acts under Section 818 (coercion, etc.)			5			1	3	3		12
Discriminatory advertising - sale	1									1
Discriminatory financing (includes real estate transactions)	1									1
Discrimination in terms and conditions of membership		1								1
Discrimination in terms, conditions, privileges relating to sale									1	1
Refusing to provide insurance					1					1
Steering	1									1
Restriction of choices relative to a rental	1									1
Total Issues	79	39	55	31	22	46	64	52	13	401
Total Complaints	61	38	46	22	18	36	43	40	6	310

OHIO CIVIL RIGHTS COMMISSION COMPLAINTS

Table 40.F.6
Fair Housing Complaints by Basis
 40. Summit County
 2004–2012 OCRRC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Age			1							1
Ancestry				1			1			2
Color	4	5	11	2	6	4	2	8	1	43
Disability	52	37	42	34	22	19	30	31	4	271
Family Status	16	2	10	12	15	7	15	7	1	85
Gender	12	13	20	4	12	9	6	7	2	85
National Origin	2	1	2	1	1	1	3	1	1	13
Race	34	19	35	20	23	9	9	25	6	196
Religion	3	1	2	2	1	1	1	1		12
Retaliation	11	12	22	8	13	8	4	6	2	86
Other	3		2						1	6
Total Bases	137	90	147	84	95	72	71	86	18	800
Total Complaints	110	69	97	60	55	46	56	63	12	568

Table 40.F.7
Fair Housing Complaints by Issue
 40. Summit County
 2004–2012 OCRRC Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Advertising	3		2			1	2	4		12
Demotion						1				1
Exclusion	4			1	3	3				11
Harassment	11	4	14	1	9	3	5	7	1	55
Intimidation	8	2	19	3	10	6	4	7	2	61
Other	54	32	20	8	11	10	11	17	10	173
Reasonable Accommodation	14	5	16	9		5	24	15	3	91
Sexual Harassment	5	2	6	2	2		2			19
Terms and Conditions	37	35	70	45	39	29	36	33	4	328
Total Issues	136	80	147	69	74	58	84	83	20	751
Total Complaints	110	69	97	60	55	46	56	63	12	568

Table 40.F.8
Fair Housing Complaints by Closure Status
 40. Summit County
 2004–2012 OCRRC Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Administrative Closure	6	2	2		2	9	6	11		38
CP Failed to Cooperate	3	1	4	12	1		1	2	1	25
CP Withdrawal – No Benefit	5	3	8	3	10	2	3	4	3	41
Hearings Discrimination Finding			1							1
No Cause Finding Issued	44	34	35	21	29	18	14	20		215
No Jurisdiction	1	1	3		1	1	1	1	2	11
Open Charge Closed By Legal Activity		1	3							4
Settlement With Benefits	26	17	21	12	7	11	18	16	3	131
Successful Conciliation	3	2	4	7			1			17
Withdrawal With Benefits	19	8	16	5	5	5	12	9	3	82
Missing	3									3
Total Complaints	110	69	97	60	55	46	56	63	12	568

FAIR HOUSING CONTACT SERVICE COMPLAINTS

Table 40.F.9
Fair Housing Complaints by Basis
 40. Summit County
 2004–2012 FHCS Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Advertising	4									4
Age					1	1		1		3
Ancestry				1	1					2
Color	3	4	7	6	7			3	1	31
Criminal Background					1	1				2
Disability	28	7	67	54	54	45	53	65	38	411
Familial Status	13	3	33	13	31	23	30	26	2	174
Harassment				2	5	3	3			13
National Origin			11	3	7	6	4	4	1	36
Race	20	7	43	25	30	41	25	28	17	236
Retaliation	1		13	8	13	11	4	8	3	61
Sex	6	3	16	10	13	17	12	11	15	103
Other				4	13	5		1		23
None			13							13
Unknown				5						5
Total Bases	75	24	203	131	176	153	131	147	77	1,117
Total Complaints	60	18	164	104	146	107	109	133	67	908

Table 40.F.10
Fair Housing Complaints by Closure Status
 40. Summit County
 2004–2012 FHCS Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Closed			58	39	40	52	9	21	4	223
Dismissed			6	1	3	2		1		13
Elected not to pursue						8	12	5	9	34
Independently resolved						18	12	17	4	51
Inquiry			38	23	63	3	1	2	13	143
Lack of jurisdiction					10					10
No contact							36	38	6	80
No probable cause			19	17	12	8	3	6		65
Pending			11	13	2		1	2	6	35
Probable cause			7	3		3	14	12		39
Reasonable accommodation granted				1			3	6	5	15
Reasonable modification granted							1	1	2	4
Referred for other assistance							2	3	7	12
Settled			25	5	6	12	15	15	7	85
Settled through OCRC					5	1			1	7
Withdrawal of Charge					4			4	3	11
Missing	60	18		2	1					81
Total Complaints	60	18	164	104	146	107	109	133	67	908

THE HOUSING RESEARCH AND ADVOCACY CENTER COMPLAINTS

Table 40.F.11
Fair Housing Complaints by Basis
 40 Summit County
 2004–2012 HRAC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Accessibility						1				1
Disability								1		1
Race				1						1
Sex				1						1
Total Bases	0	0	0	2	0	1	0	1	0	4
Total Complaints				1		1		1		3

Table 40.F.12
Fair Housing Complaints by Issue
 40 Summit County
 2004–2012 HRAC Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Rental						1		1		2
Sale				1						1
Total	0	0	0	1	0	1	0	1	0	3
Total Complaints				1		1		1		3

Table 40.F.13
Fair Housing Complaints by Action Taken
 40 Summit County
 2004–2012 HRAC Data

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

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 40.G.1
Primary Role of Respondent
 40. Summit County
 2012–2013 Fair Housing Survey for Housing
 Stakeholders Data

Primary Role	Total
Advocate/Service Provider	9
Local Government	3
Property Management	3
Construction/Development	2
Law/Legal Services	2
Real Estate	2
Resident Advisory Council Leader	1
Other Role	4
Total	26

FEDERAL, STATE, AND LOCAL LAWS

Table 40.G.2
Familiarity with Fair Housing Laws

40. Summit County
2012–2013 Fair Housing Survey
for Housing Stakeholders Data

Familiarity	Total
Not Familiar	3
Somewhat Familiar	7
Very Familiar	9
Missing	7
Total	26

Table 40.G.3
Perceptions About Fair Housing Laws

40. Summit 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	4	1	7	26
Are fair housing laws difficult to understand or follow?	8	9	1	8	26
Do you think fair housing laws should be changed?	6	6	6	8	26
Do you think fair housing laws are adequately enforced?	12	2	2	10	26

Table 40.G.4
Fair Housing Activities

40. Summit County
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?		12	2	2	10	26
Have you participated in fair housing training?		11	3	1	11	26
Are you aware of any fair housing testing?		14		2	10	26
Testing and education	Too Little	Right Amount	Too Much	Don't Know	Missing	Total
Is there sufficient outreach and education activity?	5	4	2	5	10	26
Is there sufficient testing?	4	3		9	10	26

Table 40.G.5
Protected Classes

40. Summit County
2012–2013 Fair Housing Survey
for Housing Stakeholders Data

Protected Class	Total
Family Status	12
Gender	9
Religion	8
Color	6
National Origin	5
Age	4
Sexual Orientation	3
Military	3
Other	3
Disability	2
Race	1
Total	57

Table 40.G.6
Fair Housing Violation Referrals
 40. Summit County
 2012–2013 Fair Housing Survey for Housing
 Stakeholders Data

Referral	Total
County	1
Fair Housing Advocates Association	7
Fair Housing Contact Service	9
HUD	3
Lawyer	1
Legal Aid	1
OCRC	2
Other	1
Would not refer	2
Total	27

LOCAL FAIR HOUSING

Table 40.G.7
Local Fair Housing
 40. Summit 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?	10	3	1	12	26
Are there any specific geographic areas that have fair housing problems?	1	6	6	13	26
Are there any specific groups in that face housing discrimination?	4	4	6	12	26

FAIR HOUSING IN THE PRIVATE SECTOR

Table 40.G.8
Barriers to Fair Housing in the Private Sector
 40. Summit 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?	7	6	4	9	26
The real estate industry?	3	7	5	11	26
The mortgage and home lending industry?	1	6	9	10	26
The housing construction or accessible housing design fields?	3	6	7	10	26
The home insurance industry?	1	6	9	10	26
The home appraisal industry?	1	5	10	10	26
Any other housing services?	1	6	8	11	26

FAIR HOUSING IN THE PUBLIC SECTOR

Table 40.G.9
Barriers to Fair Housing in the Public Sector
 40. Summit 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?	5	5	4	12	26
Zoning laws?	5	5	4	12	26
Occupancy standards or health and safety codes?	2	5	7	12	26
Property tax policies?	2	5	7	12	26
Permitting process?	3	2	9	12	26
Housing construction standards?	3	4	7	12	26
Neighborhood or community development policies?	2	4	8	12	26
Limited access to government services, such as employment services?	2	6	6	12	26
Public administrative actions or regulations?	2	4	8	12	26

NARRATIVE COMMENTS

Federal, State, and Local Laws

Table 40.G.10
How did you become aware of fair housing laws?
 40. Summit County
 2013 Fair Housing Survey Data

Comments:
<p>As a landlord, I must know "the rules".</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 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 worked on the update to the County of Summit Analysis of Impediments to Fair Housing Choice</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 trade associations such as HBA and Realtors</p>

Table 40.G.11
How should fair housing laws be changed?

40. Summit County
 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>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>They should be strengthened and the penalties made heavier, especially for municipalities and counties that receive federal funds.</p>

Local Fair Housing

Table 40.G.12
Are there any specific geographic areas that have fair housing problems?

40. Summit County
 2013 Fair Housing Survey Data

Comments:
<p>Race discrimination is still a problem in suburban areas. Discrimination against persons with disabilities is still rampant.</p>

Table 40.G.13
Are there any specific groups in that face housing discrimination?

40. Summit County
 2013 Fair Housing Survey Data

Comments:
<p>All of the protected classes.</p> <p>Disabled</p>

Table 40.G.14
Please share any additional comments.

40. Summit County
 2013 Fair Housing Survey Data

Comments:
<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 40.G.15

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

40. Summit County
2013 Fair Housing Survey Data

Comments:
<p>Disability , accommodations I am aware that these things happen, but only from reporting for the agency we contract with for Fair Housing services. 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. refusal to rent based on disability Though cases I have seen come through our office. 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 40.G.16

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

40. Summit County
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. 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.</p>

Table 40.G.17

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

40. Summit County
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>

Table 40.G.18

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

40. Summit County
2013 Fair Housing Survey Data

Comments:
<p>all over the place, inaccessibility Try looking at the housing being built around the University of Akron for compliance with the building code.</p>

Table 40.G.19

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

40. Summit County
2013 Fair Housing Survey Data

Comments:
<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 40.G.20

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

40. Summit County
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 40.G.21

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

40. Summit County
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 40.G.22

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

40. Summit County
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 40.G.23

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

40. Summit County
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 40.G.24

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

40. Summit County
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. What language would 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 someone that speaks English to translate it for him or her. .

Table 40.G.25**Are you aware of any questionable practices or barriers to fair housing choice in housing construction standards?**

40. Summit County
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.

Table 40.G.26**Are you aware of any questionable practices or barriers to fair housing choice in neighborhood or community development policies?**

40. Summit County
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 40.G.27**Are you aware of any barriers that limit access to government services, such as a lack of transportation or employment services?**

40. Summit County
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 40.G.28**Are you aware of any questionable practices or barriers to fair housing choice in any other public administrative actions or regulations?**

40. Summit County
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 Summit County that received and completed the survey.⁶¹

Table 40.H.1
Housing Development
 40. Summit 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"?	10	0	3	5	18
Guidelines that encourage development affordable housing units?	1	9	3	5	18
Any potential barriers to the development of low- to moderate- income housing?	5	6	3	4	18
Guidelines that allow the development of mixed use housing?	8	4	1	5	18
Any potential barriers to the development of mixed use housing?	7	5	1	5	18
Occupancy Standards					
A definition for the term "family"?	7	3	3	5	18
Residential occupancy standards or limits?	2	8	3	5	18
Special Needs Housing					
A definition for the term "disability"?	3	5	4	6	18
Development standards for making housing accessible to persons with disabilities?	0	8	4	6	18
A process by which persons with disabilities can request modification to the jurisdiction's policies?	5	2	5	6	18
Standards for the development of senior housing?	1	8	3	6	18
Guidelines that distinguish senior citizen housing from other residential uses?	2	6	4	6	18
Guidelines for developing housing for any other special needs populations?	3	6	3	6	18
Fair Housing Policies					
A fair housing ordinance, policy, or regulation?	2	5	5	6	18
Policies or practices for "affirmatively furthering fair housing"?	4	4	4	6	18

I. IMPEDIMENTS

The 2013 *Northeast Ohio Regional Analysis of Impediments to Fair Housing Choice* uncovered several potential issues regarding fair housing in the Summit 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 Summit County.

⁶¹ 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 by several units of local government in Summit County.

Results of the Fair Housing Surveys indicate that a number of local communities in the County lack or do not have sufficient policies or practices that adequately address the duty to affirmatively further fair housing.

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 Summit 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:* 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. This seems to be continuing in Summit County 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 Summit County 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 in Summit County. 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 40.I.1
Impediments Matrix
 40. Summit 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 ⁶²		
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					X			All	M
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							X	Disabled persons, families	M
6	Lack of inclusionary policies		X					X		X	All	H

⁶² 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.

41. CITY OF AKRON

A. CENSUS BUREAU DATA

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

Table 41.A.1

Population by Age

41. City of Akron

2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Under 5	15,661	7.2%	13,401	6.7%	-14.4%
5 to 19	45,709	21.1%	39,709	19.9%	-13.1%
20 to 24	16,464	7.6%	17,359	8.7%	5.4%
25 to 34	33,234	15.3%	27,434	13.8%	-17.5%
35 to 54	60,111	27.7%	52,327	26.3%	-12.9%
55 to 64	16,570	7.6%	23,714	11.9%	43.1%
65 or Older	29,325	13.5%	25,166	12.6%	-14.2%
Total	217,074	100.0%	199,110	100.0%	-8.3%

Table 41.A.2

Elderly Population by Age

41. City of Akron

2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
65 to 66	2,782	9.5%	3,025	12.0%	8.7%
67 to 69	4,234	14.4%	3,926	15.6%	-7.3%
70 to 74	7,615	26.0%	5,463	21.7%	-28.3%
75 to 79	6,957	23.7%	4,651	18.5%	-33.1%
80 to 84	4,364	14.9%	4,145	16.5%	-5.0%
85 or Older	3,373	11.5%	3,956	15.7%	17.3%
Total	29,325	100.0%	25,166	100.0%	-14.2%

Table 41.A.3

Population by Race and Ethnicity

41. City of Akron

2000 & 2010 Census SF1 Data

Race	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
White	145,924	67.2%	123,879	62.2%	-15.1%
Black	61,827	28.5%	62,648	31.5%	1.3%
American Indian	575	.3%	486	.2%	-15.5%
Asian	3,257	1.5%	4,218	2.1%	29.5%
Native Hawaiian/ Pacific Islander	48	.0%	52	.0%	8.3%
Other	940	.4%	1,543	.8%	64.1%
Two or More Races	4,503	2.1%	6,284	3.2%	39.6%
Total	217,074	100.0%	199,110	100.0%	-8.3%
Non-Hispanic	214,561	98.8	194,855	97.9%	-9.2%
Hispanic	2,513	1.2%	4,255	2.1%	69.3%

Table 41.A.4
Disability by Age
 41. City of Akron
 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	1,698	9.9%	741	4.8%	2,439	7.4%
18 to 34	1,765	7.1%	1,973	7.4%	3,738	7.3%
35 to 64	5,823	16.0%	7,323	18.6%	13,146	17.4%
65 to 74	1,762	33.9%	2,205	29.7%	3,967	31.4%
75 or Older	2,437	51.1%	3,609	48.1%	6,046	49.3%
Total	13,485	14.3%	15,851	15.2%	29,336	14.8%

Table 41.A.5
Employment Status by Disability and Type: Age 18 to 64
 41. City of Akron
 2010 Three-Year ACS Data

Disability Status	Population
Employed:	85,032
With a disability:	5,242
With a hearing difficulty	1,008
With a vision difficulty	653
With a cognitive difficulty	1,940
With an ambulatory difficulty	2,577
With a self-care difficulty	980
With an independent living difficulty	1,468
No disability	79,790
Unemployed:	14,702
With a disability:	1,959
With a hearing difficulty	328
With a vision difficulty	156
With a cognitive difficulty	1,033
With an ambulatory difficulty	493
With a self-care difficulty	250
With an independent living difficulty	798
No disability	12,743
Not in labor force:	27,422
With a disability:	9,683
With a hearing difficulty	1,035
With a vision difficulty	1,649
With a cognitive difficulty	4,584
With an ambulatory difficulty	6,220
With a self-care difficulty	2,789
With an independent living difficulty	5,608
No disability	17,739
Total	127,156

Table 41.A.6
Households by Income

41. City of Akron
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	19,821	22.0%	19,678	22.9%
\$15,000 to \$19,999	7,595	8.4%	6,284	7.3%
\$20,000 to \$24,999	7,453	8.3%	6,355	7.4%
\$25,000 to \$34,999	14,075	15.6%	11,407	13.3%
\$35,000 to \$49,999	15,100	16.8%	14,031	16.3%
\$50,000 to \$74,999	15,764	17.5%	14,481	16.8%
\$75,000 to \$99,999	5,773	6.4%	7,332	8.5%
\$100,000 or More	4,562	5.1%	6,467	7.5%
Total	90,143	100.0%	86,035	100.0%

Table 41.A.7
Poverty by Age

41. City of Akron
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	5,422	14.7%	6,210	13.1%
6 to 17	8,498	23.0%	10,385	21.9%
18 to 64	20,277	54.8%	28,122	59.3%
65 or Older	2,778	7.5%	2,723	5.7%
Total	36,975	100.0%	47,440	100.0%
Poverty Rate	17.5%	.	23.9%	.

Table 41.A.8
Households by Year Home Built

41. City of Akron
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	31,265	34.7%	29,105	33.8%
1940 to 1949	13,121	14.6%	9,241	10.7%
1950 to 1959	17,031	18.9%	16,102	18.7%
1960 to 1969	11,384	12.6%	9,914	11.5%
1970 to 1979	8,754	9.7%	8,464	9.8%
1980 to 1989	4,321	4.8%	5,427	6.3%
1990 to 1999	4,216	4.7%	4,543	5.3%
2000 to 2004	.	.	2,269	2.6%
2005 or Later	.	.	970	1.1%
Total	90,092	100.0%	86,035	100.0%

Table 41.A.9
Housing Units by Type

41. City of Akron
2000 Census SF3 & 2010 Five-Year ACS Data

Unit Type	2000 Census		2010 Five-Year ACS	
	Units	% of Total	Units	% of Total
Single-Family	67,447	69.3%	69,338	70.3%
Duplex	7,526	7.7%	6,954	7.0%
Tri- or Four-Plex	4,731	4.9%	4,504	4.6%
Apartment	17,278	17.8%	17,457	17.7%
Mobile Home	278	.3%	417	.4%
Boat, RV, Van, Etc.	5	.0%	0	.0%
Total	97,265	100.0%	98,670	100.0%

Table 41.A.10
Housing Units by Tenure

41. City of Akron
2000 & 2010 Census SF1 Data

Tenure	2000 Census		2010 Census		% Change 00–10
	Units	% of Total	Units	% of Total	
Occupied Housing Units	90,116	92.6%	83,712	86.9%	-7.1%
Owner-Occupied	53,500	59.4%	45,651	54.5%	-14.7%
Renter-Occupied	36,616	40.6%	38,061	45.5%	3.9%
Vacant Housing Units	7,199	7.4%	12,576	13.1%	74.7%
Total Housing Units	97,315	100.0%	96,288	100.0%	-1.1%

Table 41.A.11
Disposition of Vacant Housing Units

41. City of Akron
2000 & 2010 Census SF1 Data

Disposition	2000 Census		2010 Census		% Change 00–10
	Units	% of Total	Units	% of Total	
For Rent	3,552	49.3%	4,512	35.9%	27.0%
For Sale	987	13.7%	1,753	13.9%	77.6%
Rented or Sold, Not Occupied	735	10.2%	564	4.5%	-23.3%
For Seasonal, Recreational, or Occasional Use	273	3.8%	240	1.9%	-12.1%
For Migrant Workers	1	0.0%	1	.0%	.0%
Other Vacant	1,651	22.9%	5,506	43.8%	233.5%
Total	7,199	100.0%	12,576	100.0%	74.7%

Table 41.A.12
Households by Household Size

41. City of Akron
2000 & 2010 Census SF1 Data

Size	2000 Census		2010 Census		% Change 00–10
	Households	% of Total	Households	% of Total	
One Person	29,787	33.1%	29,156	34.8%	-2.1%
Two Persons	28,429	31.5%	26,212	31.3%	-7.8%
Three Persons	14,208	15.8%	12,941	15.5%	-8.9%
Four Persons	10,171	11.3%	8,692	10.4%	-14.5%
Five Persons	4,738	5.3%	4,167	5.0%	-12.1%
Six Persons	1,749	1.9%	1,560	1.9%	-10.8%
Seven Persons or More	1,034	1.1%	984	1.2%	-4.8%
Total	90,116	100.0%	83,712	100.0%	-7.1%

Table 41.A.13
Household Type by Tenure
 41. City of Akron
 2000 & 2010 Census SF1 Data

Household Type	2000 Census		2010 Census		% Change 00–10
	Households	% of Total	Households	% of Total	
Family Households	53,716	59.6%	47,084	56.2%	-12.3%
Married-Couple Family	33,812	62.9%	26,213	55.7%	-22.5%
Owner-Occupied	27,550	81.5%	20,923	79.8%	-24.1%
Renter-Occupied	6,262	18.5%	5,290	20.2%	-15.5%
Other Family	19,904	37.1%	20,871	44.3%	4.9%
Male Householder, No Spouse	3,955	19.9%	4,570	21.9%	15.5%
Owner-Occupied	2,267	57.3%	2,248	49.2%	-8%
Renter-Occupied	1,688	42.7%	2,322	50.8%	37.6%
Female Householder, No Spouse	15,949	80.1%	16,301	78.1%	2.2%
Owner-Occupied	6,827	42.8%	6,032	37.0%	-11.6%
Renter-Occupied	9,122	57.2%	10,269	63.0%	12.6%
Non-Family Households	36,400	40.4%	36,628	43.8%	.6%
Owner-Occupied	16,856	46.3%	16,448	44.9%	-2.4%
Renter-Occupied	19,544	53.7%	20,180	55.1%	3.3%
Total	90,116	100.0%	83,712	100.0%	-7.1%

Table 41.A.14
Group Quarters Population
 41. City of Akron
 2000 & 2010 Census SF1 Data

Group Quarters Type	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Institutionalized					
Correctional Institutions	1,152	51.0%	1,037	52.3%	-10.0%
Juvenile Facilities	.	.	66	3.3%	.
Nursing Homes	1,027	45.5%	878	44.3%	-14.5%
Other Institutions	80	3.5%	0	.0%	-100.0%
Total	2,259	100.0%	1,981	100.0%	-12.3%
Noninstitutionalized					
College Dormitories	1,634	61.7%	2,574	62.0%	57.5%
Military Quarters	0	.0%	0	.0%	%
Other Noninstitutional	1,015	38.3%	1,578	38.0%	55.5%
Total	2,649	54.0%	4,152	67.7%	56.7%
Total Group Quarters Population	4,908	100.0%	6,133	100.0%	25.0%

Table 41.A.15
Overcrowding and Severe Overcrowding
 41. City of Akron
 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	52,928	99.0%	395	.7%	118	.2%	53,441
2010 ACS	48,326	99.2%	306	.6%	83	.2%	48,715
Renter							
2000 Census	35,454	96.7%	767	2.1%	430	1.2%	36,651
2010 ACS	36,410	97.6%	724	1.9%	186	.5%	37,320
Total							
2000 Census	88,382	98.1%	1,162	1.3%	548	.6%	90,092
2010 ACS	84,736	98.5%	1,030	1.2%	269	.3%	86,035

Table 41.A.16
Households with Incomplete Plumbing Facilities
 41. City of Akron
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Plumbing Facilities	89,624	85,821
Lacking Complete Plumbing Facilities	468	214
Total Households	90,092	86,035
Percent Lacking	.5%	.2%

Table 41.A.17
Households with Incomplete Kitchen Facilities
 41. City of Akron
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Kitchen Facilities	89,402	85,399
Lacking Complete Kitchen Facilities	690	636
Total Households	90,092	86,035
Percent Lacking	.8%	.7%

Table 41.A.18
Cost Burden and Severe Cost Burden by Tenure
 41. City of Akron
 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	25,041	72.5%	5,731	16.6%	3,636	10.5%	141	.4%	34,549
2010 ACS	21,566	64.2%	7,144	21.3%	4,757	14.2%	112	.3%	33,579
Owner Without a Mortgage									
2000 Census	13,854	87.6%	1,027	6.5%	701	4.4%	240	1.5%	15,822
2010 ACS	12,173	80.4%	1,620	10.7%	1,156	7.6%	187	1.2%	15,136
Renter									
2000 Census	19,990	54.6%	7,467	20.4%	6,746	18.4%	2,422	6.6%	36,625
2010 ACS	14,944	40.0%	8,836	23.7%	10,772	28.9%	2,768	7.4%	37,320
Total									
2000 Census	58,885	67.7%	14,225	16.4%	11,083	12.7%	2,803	3.2%	86,996
2010 ACS	48,683	56.6%	17,600	20.5%	16,685	19.4%	3,067	3.6%	86,035

Table 41.A.19
Median Housing Costs
 41. City of Akron
 2000 Census SF3 & 2010 Five-Year ACS Data

Housing Cost	2000 Census	2010 ACS
Median Contract Rent	\$413	\$516
Median Home Value	\$76,500	\$91,800

B. BLS DATA

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

Table 41.B.1
Labor Force Statistics
 41. City of Akron
 1990–2011 BLS Data

Year	Labor Force	Employment	Unemployment	Unemployment Rate	Statewide Unemployment Rate
1990	104,576	97,182	7,394	7.1%	5.7%
1991	106,330	97,505	8,825	8.3%	6.6%
1992	108,754	98,460	10,294	9.5%	7.4%
1993	109,095	99,862	9,233	8.5%	6.7%
1994	110,849	103,125	7,724	7.0%	5.6%
1995	111,648	104,529	7,119	6.4%	4.9%
1996	113,148	105,681	7,467	6.6%	5.0%
1997	113,455	106,334	7,121	6.3%	4.6%
1998	112,507	106,037	6,470	5.8%	4.3%
1999	113,540	106,785	6,755	5.9%	4.3%
2000	107,217	100,752	6,465	6.0%	4.0%
2001	107,440	100,302	7,138	6.6%	4.4%
2002	108,393	99,060	9,333	8.6%	5.7%
2003	104,888	97,641	7,247	6.9%	6.2%
2004	105,282	98,164	7,118	6.8%	6.1%
2005	106,084	99,294	6,790	6.4%	5.9%
2006	106,872	100,628	6,244	5.8%	5.4%
2007	106,758	100,411	6,347	5.9%	5.6%
2008	107,380	100,206	7,174	6.7%	6.5%
2009	106,274	95,168	11,106	10.5%	10.1%
2010	100,673	89,642	11,031	11.0%	10.0%
2011	98,806	89,539	9,267	9.4%	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.⁶³ The information presented in this section presents detailed HMDA data, including denial rates and predatory lending including high annual percentage rate (APR) loans.

Table 41.C.1
Purpose of Loan by Year
41. City of Akron
2004–2011 HMDA Data

Purpose	2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	6,884	8,995	8,235	4,582	2,760	2,565	1,945	1,703	37,669
Home Improvement	1,750	2,218	1,893	1,528	1,216	684	420	423	10,132
Refinancing	15,455	14,647	12,399	8,197	4,743	3,964	3,237	2,747	65,389
Total	24,089	25,860	22,527	14,307	8,719	7,213	5,602	4,873	113,190

Table 41.C.2
Occupancy Status for Home Purchase Loan Applications
41. City of Akron
2004–2011 HMDA Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	Total
Owner-Occupied	5,409	6,983	6,379	3,513	2,374	2,401	1,813	1,578	30,450
Not Owner-Occupied	1,423	1,955	1,816	1,013	378	158	131	119	6,993
Not Applicable	52	57	40	56	8	6	1	6	226
Total	6,884	8,995	8,235	4,582	2,760	2,565	1,945	1,703	37,669

Table 41.C.3
Owner-Occupied Home Purchase Loan Applications by Loan Type
41. City of Akron
2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Conventional	4,371	6,007	5,616	2,821	949	620	459	510	21,353
FHA - Insured	942	879	683	646	1,346	1,682	1,251	988	8,417
VA - Guaranteed	95	97	79	46	79	99	103	80	678
Rural Housing Service or Farm Service Agency	1	0	1	0	0	0	0	0	2
Total	5,409	6,983	6,379	3,513	2,374	2,401	1,813	1,578	30,450

⁶³ 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 41.C.4
Loan Applications by Action Taken
 41. City of Akron
 2004–2011 HMDA Data

Action	2004	2005	2006	2007	2008	2009	2010	2011	Total
Loan Originated	2,730	3,164	2,834	1,725	1,165	1,119	869	713	14,319
Application Approved but not Accepted	427	530	436	170	82	47	39	30	1,761
Application Denied	686	1,039	954	518	281	185	157	126	3,946
Application Withdrawn by Applicant	347	700	454	184	107	122	87	81	2,082
File Closed for Incompleteness	84	120	121	66	32	27	16	15	481
Loan Purchased by the Institution	1,135	1,418	1,579	847	706	901	645	613	7,844
Preapproval Request Denied	0	12	1	3	1	0	0	0	17
Preapproval Approved but not Accepted	0	0	0	0	0	0	0	0	0
Total	5,409	6,983	6,379	3,513	2,374	2,401	1,813	1,578	30,450
Denial Rate	20.1%	24.7%	25.2%	23.1%	19.4%	14.2%	15.3%	15.0%	21.6%

Table 41.C.5
Denial Rates by Gender of Applicant
 41. City of Akron
 2004–2011 HMDA Data

Year	Male	Female	Not Available	Not Applicable	Average
2004	18.3%	19.3%	63.6%	.0%	20.1%
2005	23.5%	24.5%	43.1%	%	24.7%
2006	22.4%	26.7%	49.0%	.0%	25.2%
2007	21.4%	23.5%	50.7%	%	23.1%
2008	19.1%	17.9%	46.3%	.0%	19.4%
2009	15.1%	12.4%	20.0%	%	14.2%
2010	15.7%	12.4%	43.8%	%	15.3%
2011	16.3%	11.5%	26.1%	%	15.0%
Average	20.3%	21.3%	46.4%	.0%	21.6%

Table 41.C.6
Loan Applications by Selected Action Taken by Gender of Applicant
 41. City of Akron
 2004–2011 HMDA Data

Gender		2004	2005	2006	2007	2008	2009	2010	2011	Total
Male	Originated	1,734	1,851	1,635	1,084	684	654	505	402	8,549
	Denied	389	569	472	295	162	116	94	78	2,175
	Denial Rate	18.3%	23.5%	22.4%	21.4%	19.1%	15.1%	15.7%	16.3%	20.3%
Female	Originated	956	1,214	1,123	605	458	437	346	277	5,416
	Denied	229	395	410	186	100	62	49	36	1,467
	Denial Rate	19.3%	24.5%	26.7%	23.5%	17.9%	12.4%	12.4%	11.5%	21.3%
Not Available	Originated	39	99	75	36	22	28	18	34	351
	Denied	68	75	72	37	19	7	14	12	304
	Denial Rate	63.6%	43.1%	49.0%	50.7%	46.3%	20.0%	43.8%	26.1%	46.4%
Not Applicable	Originated	1	0	1	0	1	0	0	0	3
	Denied	0	0	0	0	0	0	0	0	0
	Denial Rate	.0%	%	.0%	%	.0%	%	%	%	.0%
Total	Originated	2,730	3,164	2,834	1,725	1,165	1,119	869	713	14,319
	Denied	686	1,039	954	518	281	185	157	126	3,946
	Denial Rate	20.1%	24.7%	25.2%	23.1%	19.4%	14.2%	15.3%	15.0%	21.6%

Table 41.C.7
Denial Rates by Race/Ethnicity of Applicant
 41. City of Akron
 2004–2011 HMDA Data

Race/Ethnicity	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	40.0%	37.5%	33.3%	36.4%	100.0%	40.0%	50.0%	.0%	42.2%
Asian	17.5%	18.0%	37.7%	18.2%	9.5%	15.0%	25.0%	13.3%	20.9%
Black	24.3%	31.6%	35.3%	36.7%	30.5%	17.5%	19.4%	28.8%	30.6%
White	16.1%	20.1%	18.5%	17.7%	15.9%	12.9%	12.7%	11.7%	16.9%
Not Available	48.8%	41.1%	48.3%	42.9%	37.0%	23.8%	38.6%	24.1%	42.4%
Not Applicable	50.0%	%	.0%	%	.0%	0%	0%	%	25.0%
Average	20.1%	24.7%	25.2%	23.1%	19.4%	14.2%	15.3%	15.0%	21.6%
Non-Hispanic	17.1%	22.4%	23.2%	21.3%	18.8%	13.5%	13.8%	14.1%	19.6%
Hispanic	35.9%	37.9%	22.2%	16.7%	5.0%	7.1%	18.2%	25.0%	26.0%

Table 41.C.8
Loan Applications by Selected Action Taken by Race/Ethnicity of Applicant
 41. City of Akron
 2004–2011 HMDA Data

Race		2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Originated	3	5	6	7	0	3	1	1	26
	Denied	2	3	3	4	4	2	1	0	19
	Denial Rate	40.0%	37.5%	33.3%	36.4%	100.0%	50.0%	50.0%	.0%	42.2%
Asian	Originated	47	41	33	18	19	17	15	26	216
	Denied	10	9	20	4	2	3	5	4	57
	Denial Rate	17.5%	18.0%	37.7%	18.2%	9.5%	15.0%	25.0%	13.3%	20.9%
Black	Originated	458	582	589	269	162	141	104	84	2,389
	Denied	147	269	321	156	71	30	25	34	1,053
	Denial Rate	24.3%	31.6%	35.3%	36.7%	30.5%	17.5%	19.4%	28.8%	30.6%
White	Originated	2,091	2,264	2,050	1,343	937	910	714	558	10,867
	Denied	402	568	465	288	177	135	104	74	2,213
	Denial Rate	16.1%	20.1%	18.5%	17.7%	15.9%	12.9%	12.7%	11.7%	16.9%
Not Available	Originated	130	272	155	88	46	48	35	44	818
	Denied	124	190	145	66	27	15	22	14	603
	Denial Rate	48.8%	41.1%	48.3%	42.9%	37.0%	23.8%	38.6%	24.1%	42.4%
Not Applicable	Originated	1	0	1	0	1	0	0	0	3
	Denied	1	0	0	0	0	0	0	0	1
	Denial Rate	48.8%	41.1%	48.3%	42.9%	37.0%	23.8%	38.6%	24.1%	25.0%
Total	Originated	2,730	3,164	2,834	1,725	1,165	1,119	869	713	14,319
	Denied	686	1,039	954	518	281	185	157	126	3,946
	Denial Rate	20.1%	24.7%	25.2%	23.1%	19.4%	14.2%	15.3%	15.0%	21.6%
Non-Hispanic	Originated	2,377	2,827	2,631	1,609	1,090	1,052	819	663	13,068
	Denied	492	816	795	435	252	164	131	109	3,194
	Denial Rate	17.1%	22.4%	23.2%	21.3%	18.8%	13.5%	13.8%	14.1%	19.6%
Hispanic	Originated	25	41	35	20	19	13	9	6	168
	Denied	14	25	10	4	1	1	2	2	59
	Denial Rate	35.9%	37.9%	22.2%	16.7%	5.0%	7.1%	18.2%	25.0%	26.0%

Table 41.C.9
Loan Applications by Reason for Denial
 41. City of Akron
 2004–2011 HMDA Data

Denial Reason	2004	2005	2006	2007	2008	2009	2010	2011	Total
Debt-to-Income Ratio	81	94	87	66	42	34	37	21	462
Employment History	6	16	6	11	10	4	5	1	59
Credit History	138	193	159	117	60	41	34	24	766
Collateral	57	85	84	72	45	34	24	31	432
Insufficient Cash	15	15	11	8	6	5	6	2	68
Unverifiable Information	21	59	41	17	14	6	4	4	166
Credit Application Incomplete	34	72	43	45	31	8	23	20	276
Mortgage Insurance Denied	0	0	3	0	1	0	2	0	6
Other	174	300	175	58	15	13	14	5	754
Missing	160	205	345	124	57	40	8	18	957
Total	686	1,039	954	518	281	185	157	126	3,946

Table 41.C.10
Denial Rates by Income of Applicant
 41. City of Akron
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	42.6%	57.7%	42.0%	52.5%	59.3%	34.3%	41.4%	30.0%	46.3%
\$15,001–\$30,000	28.0%	31.2%	30.6%	27.9%	23.7%	17.1%	20.5%	14.5%	27.2%
\$30,001–\$45,000	18.8%	22.9%	24.8%	21.3%	19.6%	12.9%	14.1%	13.1%	20.5%
\$45,001–\$60,000	16.3%	21.0%	21.7%	22.5%	18.1%	9.9%	5.9%	16.3%	18.3%
\$60,001–\$75,000	11.5%	17.4%	25.4%	18.9%	10.9%	11.5%	12.1%	15.0%	16.8%
Above \$75,000	12.1%	17.8%	15.6%	18.8%	11.0%	11.6%	16.2%	17.2%	15.3%
Data Missing	26.0%	36.1%	29.3%	21.4%	37.5%	53.3%	25.0%	13.3%	30.1%
Total	20.1%	24.7%	25.2%	23.1%	19.4%	14.2%	15.3%	15.0%	21.6%

Table 41.C.11
Denial Rates of Loans by Race/Ethnicity and Income of Applicant
 41. City of Akron
 2004–2011 HMDA Data

Race	<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	Above \$75K	Data Missing	Average
American Indian	100.0%	66.7%	22.2%	33.3%	60.0%	33.3%	%	42.2%
Asian	66.7%	18.7%	23.3%	22.5%	9.1%	23.1%	20.0%	20.9%
Black	45.5%	35.4%	28.5%	27.6%	25.2%	26.7%	43.2%	30.6%
White	44.7%	21.5%	16.1%	14.1%	13.7%	12.2%	19.8%	16.9%
Not Available	54.3%	51.7%	38.8%	38.7%	32.0%	28.8%	61.2%	42.4%
Not Applicable	%	%	100.0%	%	%	%	.0%	25.0%
Average	46.3%	27.2%	20.5%	18.3%	16.8%	15.3%	30.1%	21.6%
Non-Hispanic Ethnicity	46.0%	24.8%	18.6%	16.9%	15.4%	14.0%	22.9%	19.6%
Hispanic (Ethnicity)	.0%	27.0%	26.9%	26.1%	40.0%	15.0%	.0%	26.0%

Table 41.C.12
Loan Applications by Reason for Denial by Race/Ethnicity of Applicant

41. City of Akron
 2004–2011 HMDA Data

Denial Reason	American Indian	Asian	Black	White	Not Available	Not Applicable	Total	Hispanic (Ethnicity)
Debt-to-Income Ratio	2	5	122	295	38	0	462	6
Employment History	1	0	8	42	8	0	59	0
Credit History	3	13	198	445	107	0	766	17
Collateral	2	14	100	274	41	1	432	8
Insufficient Cash	0	0	20	38	10	0	68	0
Unverifiable Information	0	2	50	93	21	0	166	4
Credit Application Incomplete	0	4	67	162	43	0	276	2
Mortgage Insurance Denied	0	0	0	4	2	0	6	0
Other	3	9	200	397	145	0	754	7
Missing	8	10	288	463	188	0	957	15
Total	19	57	1,053	2,213	603	1	3,946	59
% Missing	42.1%	17.5%	27.4%	20.9%	31.2%	.0%	24.3%	25.4%

Table 41.C.13
Loan Applications by Income of Applicant: Originated and Denied

41. City of Akron
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Loan Originated	27	22	40	19	11	23	17	7	166
	Application Denied	20	30	29	21	16	12	12	3	143
	Denial Rate	42.6%	57.7%	42.0%	52.5%	59.3%	34.3%	41.4%	30.0%	46.3%
\$15,001–\$30,000	Loan Originated	667	801	694	391	271	272	213	195	3,504
	Application Denied	259	364	306	151	84	56	55	33	1,308
	Denial Rate	28.0%	31.2%	30.6%	27.9%	23.7%	17.1%	20.5%	14.5%	27.2%
\$30,001–\$45,000	Loan Originated	892	1,100	932	558	398	377	262	213	4,732
	Application Denied	207	326	308	151	97	56	43	32	1,220
	Denial Rate	18.8%	22.9%	24.8%	21.3%	19.6%	12.9%	14.1%	13.1%	20.5%
\$45,001–\$60,000	Loan Originated	515	576	555	310	199	219	174	123	2,671
	Application Denied	100	153	154	90	44	24	11	24	600
	Denial Rate	16.3%	21.0%	21.7%	22.5%	18.1%	9.9%	5.9%	16.3%	18.3%
\$60,001–\$75,000	Loan Originated	239	300	220	167	106	92	80	51	1,255
	Application Denied	31	63	75	39	13	12	11	9	253
	Denial Rate	11.5%	17.4%	25.4%	18.9%	10.9%	11.5%	12.1%	15.0%	16.8%
Above \$75,000	Loan Originated	319	296	352	247	170	129	114	111	1,738
	Application Denied	44	64	65	57	21	17	22	23	313
	Denial Rate	12.1%	17.8%	15.6%	18.8%	11.0%	11.6%	16.2%	17.2%	15.3%
Data Missing	Loan Originated	71	69	41	33	10	7	9	13	253
	Application Denied	25	39	17	9	6	8	3	2	109
	Denial Rate	26.0%	36.1%	29.3%	21.4%	37.5%	53.3%	25.0%	13.3%	30.1%
Total	Loan Originated	2,730	3,164	2,834	1,725	1,165	1,119	869	713	14,319
	Application Denied	686	1,039	954	518	281	185	157	126	3,946
	Denial Rate	20.1%	24.7%	25.2%	23.1%	19.4%	14.2%	15.3%	15.0%	21.6%

Table 41.C.14
Loan Applications by Income and Race/Ethnicity of Applicant: Originated and Denied
 41. City of Akron
 2004–2011 HMDA Data

Race		<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	> \$75K	Data Missing	Total
American Indian	Loan Originated	0	3	7	10	2	4	0	26
	Application Denied	1	6	2	5	3	2	0	19
	Denial Rate	100.0%	66.7%	22.2%	33.3%	60.0%	33.3%	%	42.2%
Asian	Loan Originated	1	74	66	31	20	20	4	216
	Application Denied	2	17	20	9	2	6	1	57
	Denial Rate	66.7%	18.7%	23.3%	22.5%	9.1%	23.1%	20.0%	20.9%
Black	Loan Originated	30	687	871	425	181	170	25	2,389
	Application Denied	25	377	347	162	61	62	19	1,053
	Denial Rate	45.5%	35.4%	28.5%	27.6%	25.2%	26.7%	43.2%	30.6%
White	Loan Originated	119	2,543	3,509	2,075	986	1,440	195	10,867
	Application Denied	96	697	673	342	156	201	48	2,213
	Denial Rate	44.7%	21.5%	16.1%	14.1%	13.7%	12.2%	19.8%	16.9%
Not Available	Loan Originated	16	197	279	130	66	104	26	818
	Application Denied	19	211	177	82	31	42	41	603
	Denial Rate	54.3%	51.7%	38.8%	38.7%	32.0%	28.8%	61.2%	42.4%
Not Applicable	Loan Originated	0	0	0	0	0	0	3	3
	Application Denied	0	0	1	0	0	0	0	1
	Denial Rate	%	%	100.0%	%	%	%	.0%	25.0%
Total	Loan Originated	166	3,504	4,732	2,671	1,255	1,738	253	14,319
	Application Denied	143	1,308	1,220	600	253	313	109	3,946
	Denial Rate	46.3%	27.2%	20.5%	18.3%	16.8%	15.3%	30.1%	21.6%
Non-Hispanic Ethnicity	Loan Originated	143	3,181	4,338	2,448	1,157	1,585	216	13,068
	Application Denied	122	1,050	991	499	210	258	64	3,194
	Denial Rate	46.0%	24.8%	18.6%	16.9%	15.4%	14.0%	22.9%	19.6%
Hispanic (Ethnicity)	Loan Originated	4	54	49	34	9	17	1	168
	Application Denied	0	20	18	12	6	3	0	59
	Denial Rate	.0%	27.0%	26.9%	26.1%	40.0%	15.0%	.0%	26.0%

PREDATORY LENDING

Table 41.C.15
Originated Owner-Occupied Loans by HAL Status
 41. City of Akron
 2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Other	2,171	1,935	1,736	1,373	961	997	868	711	10,752
HAL	559	1,229	1,098	352	204	122	1	2	3,567
Total	2,730	3,164	2,834	1,725	1,165	1,119	869	713	14,319
Percent HAL	20.5%	38.8%	38.7%	20.4%	17.5%	10.9%	.1%	.3%	24.9%

Table 41.C.16
Loans by Loan Purpose by HAL Status
 41. City of Akron
 2004–2011 HMDA Data

Loan Purpose		2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	Other	2,171	1,935	1,736	1,373	961	997	868	711	10,752
	HAL	559	1,229	1,098	352	204	122	1	2	3,567
	Percent HAL	20.5%	38.8%	38.7%	20.4%	17.5%	10.9%	.1%	.3%	24.9%
Home Improvement	Other	304	401	335	265	204	123	75	93	1,800
	HAL	155	189	168	118	54	30	16	5	735
	Percent HAL	33.8%	32.0%	33.4%	30.8%	20.9%	19.6%	17.6%	5.1%	29.0%
Refinancing	Other	2,843	1,902	1,458	1,255	807	1,115	1,154	971	11,505
	HAL	1,261	1,599	1,282	539	235	119	24	20	5,079
	Percent HAL	30.7%	45.7%	46.8%	30.0%	22.6%	9.6%	2.0%	2.0%	30.6%
Total	Other	5,318	4,238	3,529	2,893	1,972	2,235	2,097	1,775	24,057
	HAL	1,975	3,017	2,548	1,009	204	122	1	2	9,381
	Percent HAL	27.1%	41.6%	41.9%	25.9%	20.0%	10.8%	1.9%	1.5%	28.1%

Table 41.C.17
HALs Originated by Race of Borrower
 41. City of Akron
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	0	2	2	3	0	0	0	0	7
Asian	10	11	8	2	3	5	0	0	39
Black	134	319	374	91	45	30	0	0	993
White	355	688	617	233	144	84	1	2	2,124
Not Available	60	209	97	23	12	3	0	0	404
Not Applicable	0	0	0	0	0	0	0	0	0
Total	559	1,229	1,098	352	204	122	1	2	3,567
Hispanic (Ethnicity)	7	19	14	5	4	2	0	0	51

Table 41.C.18
Rate of HALs Originated by Race/Ethnicity of Borrower
 41. City of Akron
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	.0%	40.0%	33.3%	42.9%	%	.0%	.0%	.0%	26.9%
Asian	21.3%	26.8%	24.2%	11.1%	15.8%	29.4%	.0%	.0%	18.1%
Black	29.3%	54.8%	63.5%	33.8%	27.8%	21.3%	.0%	.0%	41.6%
White	17.0%	30.4%	30.1%	17.3%	15.4%	9.2%	.1%	.4%	19.5%
Not Available	46.2%	76.8%	62.6%	26.1%	26.1%	6.3%	.0%	.0%	49.4%
Not Applicable	.0%	%	.0%	%	.0%	%	%	%	0%
Average	20.5%	38.8%	38.7%	20.4%	17.5%	10.9%	0.1%	0.3%	24.9%
Non-Hispanic Ethnicity	20.0%	35.0%	37.1%	20.1%	17.2%	10.9%	.1%	.3%	23.5%
Hispanic (Ethnicity)	28.0%	46.3%	40.0%	25.0%	21.1%	15.4%	.0%	.0%	30.4%

Table 41.C.19
Loans by HAL Status by Race/Ethnicity of Borrower
 41. City of Akron
 2004–2011 HMDA Data

Race	Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Other	3	3	4	4	0	3	1	1	19
	HAL	0	2	2	3	0	0	0	0	7
	Percent HAL	.0%	40.0%	33.3%	42.9%	%	.0%	.0%	.0%	26.9%
Asian	Other	37	30	25	16	16	12	15	26	177
	HAL	10	11	8	2	3	5	0	0	39
	Percent HAL	21.3%	26.8%	24.2%	11.1%	15.8%	29.4%	.0%	.0%	18.1%
Black	Other	324	263	215	178	117	111	104	84	1,396
	HAL	134	319	374	91	45	30	0	0	993
	Percent HAL	29.3%	54.8%	63.5%	33.8%	27.8%	21.3%	.0%	.0%	41.6%
White	Other	1,736	1,576	1,433	1,110	793	826	713	556	8,743
	HAL	355	688	617	233	144	84	1	2	2,124
	Percent HAL	17.0%	30.4%	30.1%	17.3%	15.4%	9.2%	0.1%	0.4%	19.5%
Not Available	Other	70	63	58	65	34	45	35	44	414
	HAL	60	209	97	23	12	3	0	0	404
	Percent HAL	46.2%	76.8%	62.6%	26.1%	26.1%	6.3%	.0%	.0%	49.4%
Not Applicable	Other	1	0	1	0	1	0	0	0	3
	HAL	0	0	0	0	0	0	0	0	0
	Percent HAL	.0%	%	.0%	%	.0%	%	%	%	0.0%
Total	Other	2,171	1,935	1,736	1,373	961	997	868	711	10,752
	HAL	559	1,229	1,098	352	204	122	1	2	3,567
	Percent HAL	20.5%	38.8%	38.7%	20.4%	17.5%	10.9%	.1%	.3%	24.9%
Non-Hispanic Ethnicity	Other	1,902	1,838	1,655	1,285	903	937	818	661	9,999
	HAL	475	989	976	324	187	115	1	2	3,069
	Percent HAL	20.0%	35.0%	37.1%	20.1%	17.2%	10.9%	.1%	.3%	23.5%
Hispanic (Ethnicity)	Other	18	22	21	15	15	11	9	6	117
	HAL	7	19	14	5	4	2	0	0	51
	Percent HAL	28.0%	46.3%	40.0%	25.0%	21.1%	15.4%	.0%	.0%	30.4%

Table 41.C.20
Rates of HALs by Income of Borrower
 41. City of Akron
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Average
\$15,000 or Below	7.4%	27.3%	20.0%	21.1%	18.2%	21.7%	.0%	.0%	16.3%
\$15,001–\$30,000	28.0%	43.6%	48.6%	27.6%	22.5%	14.0%	.5%	.5%	30.9%
\$30,001–\$45,000	22.5%	44.3%	41.6%	20.8%	19.6%	13.8%	.0%	.5%	28.0%
\$45,001–\$60,000	18.4%	38.2%	35.3%	18.7%	15.6%	5.5%	.0%	.0%	22.9%
\$60,001–\$75,000	13.8%	31.0%	35.9%	19.2%	11.3%	6.5%	.0%	.0%	20.3%
Above \$75,000	8.8%	17.2%	20.7%	10.1%	11.8%	6.2%	0.0%	.0%	11.8%
Data Missing	18.3%	33.3%	41.5%	27.3%	.0%	14.3%	.0%	.0%	24.9%
Average	20.5%	38.8%	38.7%	20.4%	17.5%	10.9%	.1%	.3%	24.9%

Table 41.C.21
Loans by HAL Status by Income of Borrower
 41. City of Akron
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Other	25	16	32	15	9	18	17	7	139
	HAL	2	6	8	4	2	5	0	0	27
	Percent HAL	7.4%	27.3%	20.0%	21.1%	18.2%	21.7%	.0%	.0%	16.3%
\$15,001–\$30,000	Other	480	452	357	283	210	234	212	194	2,422
	HAL	187	349	337	108	61	38	1	1	1,082
	Percent HAL	28.0%	43.6%	48.6%	27.6%	22.5%	14.0%	.5%	.5%	30.9%
\$30,001–\$45,000	Other	691	613	544	442	320	325	262	212	3,409
	HAL	201	487	388	116	78	52	0	1	1,323
	Percent HAL	22.5%	44.3%	41.6%	20.8%	19.6%	13.8%	.0%	.5%	28.0%
\$45,001–\$60,000	Other	420	356	359	252	168	207	174	123	2,059
	HAL	95	220	196	58	31	12	0	0	612
	Percent HAL	18.4%	38.2%	35.3%	18.7%	15.6%	5.5%	.0%	.0%	22.9%
\$60,001–\$75,000	Other	206	207	141	135	94	86	80	51	1,000
	HAL	33	93	79	32	12	6	0	0	255
	Percent HAL	13.8%	31.0%	35.9%	19.2%	11.3%	6.5%	.0%	.0%	20.3%
Above \$75,000	Other	291	245	279	222	150	121	114	111	1,533
	HAL	28	51	73	25	20	8	0	0	205
	Percent HAL	8.8%	17.2%	20.7%	10.1%	11.8%	6.2%	.0%	.0%	11.8%
Data Missing	Other	58	46	24	24	10	6	9	13	190
	HAL	13	23	17	9	0	1	0	0	63
	Percent HAL	18.3%	33.3%	41.5%	27.3%	.0%	14.3%	.0%	.0%	24.9%
Total	Other	2,171	1,935	1,736	1,373	961	997	868	711	10,752
	HAL	559	1,229	1,098	352	204	122	1	2	3,567
	Percent HAL	20.5%	38.8%	38.7%	20.4%	17.5%	10.9%	.1%	.3%	24.9%

D. CRA DATA

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

Table 41.D.1
Small Business Loans Originated: \$100,000 or Less by Tract MFI
 41. City of Akron
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	375	930	856	352		2,513
2001	553	1,110	1,009	306		2,978
2002	633	1,270	1,081	391		3,375
2003	1,020	1,379	931	296		3,626
2004	957	1,300	938	288		3,483
2005	925	1,309	980	286		3,500
2006	1,131	1,716	1,385	416		4,648
2007	1,209	1,751	1,526	440		4,926
2008	903	1,357	1,128	327		3,715
2009	433	517	490	161		1,601
2010	415	493	372	161		1,441
2011	465	643	483	182		1,773
Total	9,019	13,775	11,179	3,606	0	37,579
Loan Amount (\$1,000s)						
2000	5,801	13,713	10,628	4,530		34,672
2001	7,071	15,689	12,673	4,010		39,443
2002	7,265	14,372	12,313	4,223		38,173
2003	11,995	15,000	8,426	2,598		38,019
2004	11,886	14,731	9,150	3,001		38,768
2005	13,320	13,937	10,216	3,025		40,498
2006	11,808	17,812	12,487	4,020		46,127
2007	13,656	19,072	13,784	4,559		51,071
2008	9,707	13,992	9,525	3,709		36,933
2009	6,023	6,937	4,703	1,858		19,521
2010	6,044	6,988	4,862	1,662		19,556
2011	8,129	9,624	7,080	2,405		27,238
Total	112,705	161,867	115,847	39,600	0	430,019

Table 41.D.2
Small Business Loans Originated: \$100,001 to \$250,000 by Tract MFI
 41. City of Akron
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	34	48	36	18		136
2001	38	69	42	19		168
2002	37	49	51	17		154
2003	68	74	22	11		175
2004	60	79	32	10		181
2005	57	57	38	6		158
2006	68	60	30	3		161
2007	53	51	27	7		138
2008	37	37	21	6		101
2009	30	18	11	10		69
2010	32	41	28	8		109
2011	40	46	16	8		110
Total	554	629	354	123	0	1,660
Loan Amount (\$1,000s)						
2000	6,146	7,968	6,161	3,339		23,614
2001	6,273	11,871	7,921	3,417		29,482
2002	6,688	8,779	9,261	3,478		28,206
2003	12,463	13,130	3,805	2,055		31,453
2004	10,622	14,599	5,440	1,791		32,452
2005	10,403	9,728	7,167	1,121		28,419
2006	12,199	10,857	5,016	726		28,798
2007	10,109	8,992	4,956	1,398		25,455
2008	6,869	5,993	3,514	946		17,322
2009	5,628	3,143	1,621	1,913		12,305
2010	6,278	7,187	4,921	1,284		19,670
2011	7,460	8,320	2,806	1,453		20,039
Total	101,138	110,567	62,589	22,921	0	297,215

Table 41.D.3
Small Business Loans Originated: More than \$250,000 by Tract MFI
 41. City of Akron
 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	25	27	10		86
2001	38	57	41	18		154
2002	45	43	55	17		160
2003	57	54	29	9		149
2004	67	65	29	9		170
2005	78	48	28	14		168
2006	63	66	28	9		166
2007	53	58	23	8		142
2008	50	39	6	10		105
2009	35	39	10	3		87
2010	58	45	15	12		130
2011	53	49	16	6		124
Total	621	588	307	125	0	1,641
Loan Amount (\$1,000s)						
2000	11,269	11,014	13,199	5,755		41,237
2001	20,416	28,747	19,589	9,894		78,646
2002	24,517	23,185	28,027	9,162		84,891
2003	29,768	25,465	14,788	5,755		75,776
2004	35,537	33,013	15,642	4,659		88,851
2005	40,820	25,558	15,055	7,810		89,243
2006	32,032	34,451	13,700	4,974		85,157
2007	31,831	30,842	11,624	3,388		77,685
2008	24,899	19,542	2,896	6,090		53,427
2009	17,946	21,445	6,565	1,350		47,306
2010	32,379	24,758	7,805	6,213		71,155
2011	27,632	24,180	8,172	2,843		62,827
Total	329,046	302,200	157,062	67,893	0	856,201

Table 41.D.4
Small Business Loans to Businesses with Gross Annual Revenues of Less Than \$1 Million by Tract MFI
 41. City of Akron
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	133	383	365	143		1,024
2001	188	408	514	163		1,273
2002	168	325	331	123		947
2003	283	406	307	86		1,082
2004	292	376	311	119		1,098
2005	379	562	456	135		1,532
2006	352	617	540	173		1,682
2007	417	626	544	151		1,738
2008	247	410	325	102		1,084
2009	142	156	170	75		543
2010	126	171	144	64		505
2011	189	267	238	87		781
Total	2,916	4,707	4,245	1,421	0	13,289
Loan Amount (\$1,000s)						
2000	4,722	17,181	12,385	4,471		38,759
2001	8,395	14,478	14,765	8,106		45,744
2002	13,068	17,650	20,272	8,744		59,734
2003	14,414	17,279	11,994	3,882		47,569
2004	12,183	15,333	11,648	5,364		44,528
2005	14,113	13,644	13,807	5,474		47,038
2006	12,522	14,067	13,171	5,469		45,229
2007	11,891	14,686	12,299	6,076		44,952
2008	10,179	10,984	6,792	4,768		32,723
2009	10,466	5,997	5,878	2,196		24,537
2010	6,282	8,398	4,556	1,849		21,085
2011	9,072	11,413	5,306	1,558		27,349
Total	127,307	161,110	132,873	57,957	0	479,247

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 41.E.1
Fair Housing Complaints by Basis
 41. City of Akron
 2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color			1		8	2			1	12
Disability	37	25	21	16	14	25	24	21	13	196
Family Status	10	5	5	6	5	21	18	19	3	92
National Origin	1				2	1	2		1	7
Race	30	8	20	7	12	11	3	12	6	109
Religion	1	1			1	1	2			6
Sex	9	11	11	4	10	6	7		4	62
Total Bases	88	50	58	33	52	67	56	52	28	484
Total Complaints	84	49	47	31	33	52	46	51	22	415

Table 41.E.2
Fair Housing Complaints by Issue
 41. City of Akron
 2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Failure to make reasonable accommodation	15	10	10	7	3	15	14	13	9	96
Discrimination in terms, conditions or privileges relating to rental	20	9	8	7	12	10	16	9	4	95
Discrimination in services and facilities relating to rental	1		2	1	2		1	1		8
Discrimination in making of loans	6						1			7
Discriminatory terms, conditions, privileges, or services and facilities	10	7	4	5	6	4	8	7	9	60
False denial or representation of availability - rental	3		2		1					6
Failure to permit reasonable modification		1	1					2	2	6
Discriminatory refusal to rent	11	8	4	7	3	4	9	2	5	53
Non-compliance with design and construction requirements (handicap)	1		3	1						5
Failure to provide accessible and usable public and common user areas			1	1				3		5
Other discriminatory acts	9	6	9	2	9	2	4	2	2	45
Discriminatory financing (includes real estate transactions)	1		1	1	1					4
Otherwise deny or make housing available	2							1	1	4
Discriminatory advertisement - rental	2		2			13	4	16		37
Discriminatory refusal to sell		1						1	1	3
Discriminatory refusal to sell and negotiate for sale	1	1				1				3
Discrimination in the terms or conditions for making loans	2		1							3
Failure to provide an accessible route into and thru the covered unit		1		1				1		3
Discriminatory refusal to rent and negotiate for rental	13	2	2		3	2			1	23
Discriminatory advertising, statements, and notices	4	2	1	3	1	2	5	1	2	21
Discrimination in terms, conditions, privileges relating to sale	1								1	2
Discriminatory acts under Section 818 (coercion, etc.)	1	2	6	1		2	4	1	1	18
Discriminatory refusal to negotiate for rental	2		3			2	3			10
Discrimination in the appraising of residential real property				1						1
Discrimination in terms and conditions of membership		1								1
Refusing to provide insurance	1									1
Steering	1									1
Restriction of choices relative to a rental	1									1
Using ordinances to discriminate in zoning and land use							1			1
Failure to provide an accessible building entrance	1									1
Failure to provide usable kitchens and bathrooms		1								1
Total Issues	109	52	60	38	41	57	70	60	38	525
Total Complaints	84	49	47	31	33	52	46	51	22	415

Table 41.E.3
Fair Housing Complaints by Closure Status
 41. City of Akron
 2004–2012 HUD Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Administrative Closure	6	2	8	6	6	11	1	3	2	45
Cause (FHAP)	16	4	5	2	1	10	15	16		69
Charged (HUD)										
Conciliated / Settled	26	24	18	9	7	14	16	12	5	131
DOJ Closure										
No Cause	36	19	16	14	19	17	13	15		149
Open							1	5	15	21
Total Complaints	84	49	47	31	33	52	46	51	22	415

HUD Complaints Found With Cause

Table 41.E.4
Fair Housing Complaints Found With Cause by Basis
 41. City of Akron
 2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color			1							1
Disability	16	16	13	7	3	14	18	9	3	99
Family Status	8	3	1	4	4	10	12	14	1	57
National Origin						1				1
Race	16	4	8	1	1	4	1	5	1	41
Religion							1			1
Sex	6	5	5		1	3	3			23
Total Bases	46	28	28	12	9	32	35	28	5	223
Total Complaints	42	28	23	11	8	24	31	28	5	200

Table 41.E.5
Fair Housing Complaints Found With Cause by Issue
 41. City of Akron
 2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Discriminatory refusal to negotiate for rental	2		2			2	2			8
Discriminatory acts under Section 818 (coercion, etc.)			3			1	3	1		8
Failure to make reasonable accommodation	7	7	8	5	2	8	12	7	2	58
False denial or representation of availability - rental	3		2							5
Discrimination in services and facilities relating to rental			2	1	1		1			5
Discrimination in terms, conditions or privileges relating to rental	8	5	4	1	4	4	12	4		42
Non-compliance with design and construction requirements (handicap)	1		2	1						4
Discriminatory refusal to sell and negotiate for sale	1	1				1				3
Otherwise deny or make housing available	1							1	1	3
Failure to permit reasonable modification		1	1					1		3
Discriminatory terms, conditions, privileges, or services and facilities	1	3		3	1	3	5	4	3	23
Discriminatory refusal to rent	5	5		1		1	7	2	1	22
Discriminatory advertisement - rental	2					4	3	12		21
Discriminatory refusal to sell								1	1	2
Discrimination in making of loans	2									2
Failure to provide accessible and usable public and common user areas			1	1						2
Failure to provide an accessible route into and thru the covered unit		1		1						2
Other discriminatory acts	6	3	4	1		1	1	1	2	19
Discriminatory advertising, statements, and notices	2	1		2	1	2	3	1	1	13
Discriminatory refusal to rent and negotiate for rental	9				2	1				12
Discriminatory financing (includes real estate transactions)	1									1
Discrimination in the terms or conditions for making loans	1									1
Discrimination in terms and conditions of membership		1								1
Discrimination in terms, conditions, privileges relating to sale									1	1
Steering	1									1
Failure to provide an accessible building entrance	1									1
Failure to provide usable kitchens and bathrooms		1								1
Total Issues	54	29	29	17	11	28	49	35	12	264
Total Complaints	42	28	23	11	8	24	31	28	5	200

OHIO CIVIL RIGHTS COMMISSION COMPLAINTS

Table 41.E.6
Fair Housing Complaints by Basis
 41. City of Akron
 2004–2012 OCRRC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Age			1							1
Ancestry				1			1			2
Color	2	1	9		5	2		4	1	24
Disability	38	30	31	18	15	15	26	17	3	193
Family Status	7	1	8	6	6	3	8	5	1	45
Gender	9	11	15	1	8	5	3	3	1	56
National Origin	1	1	1		1	1	2			7
Race	26	10	22	9	11	2	2	17	5	117
Religion	3		2	1	1	1		1		9
Retaliation	7	12	15	3	7	4	2		1	51
Other	3								1	4
Total Bases	96	66	104	39	58	42	44	47	13	509
Total Complaints	79	51	66	31	33	27	38	37	9	371

Table 41.E.7
Fair Housing Complaints by Issue
 41. City of Akron
 2004–2012 OCRRC Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Advertising	2		2				1	3		8
Demotion						1				1
Exclusion	1					1				2
Harassment	9	3	11	1	5	2	3	1	1	36
Intimidation	6	2	17	2	8	3	2	1		41
Other	38	20	10	1	4	5	4	12	7	101
Reasonable Accommodation	11	4	11	5		5	20	13	2	71
Sexual Harassment	3	1	5	1			2			12
Terms and Conditions	26	26	45	25	25	16	25	19	3	210
Total Issues	96	56	101	35	42	33	57	49	13	482
Total Complaints	79	51	66	31	33	27	38	37	9	371

Table 41.E.8
Fair Housing Complaints by Closure Status
 41. City of Akron
 2004–2012 OCRRC Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Administrative Closure	3	2	1		1	5	4	6		22
CP Failed to Cooperate	3	1	4	5			1	1	1	16
CP Withdrawal – No Benefit	4		7	2	5		3	2	3	26
Hearings Discrimination Finding			1							1
No Cause Finding Issued	34	25	24	12	19	12	9	12		147
No Jurisdiction	1	1	2		1	1	1	1	1	9
Open Charge Closed By Legal Activity		1	3							4
Settlement With Benefits	20	12	11	6	3	7	9	9	2	79
Successful Conciliation	3	2	3	3			1			12
Withdrawal With Benefits	8	7	10	3	4	2	10	6	2	52
Missing	3									3
Total Complaints	79	51	66	31	33	27	38	37	9	371

FAIR HOUSING CONTACT SERVICE COMPLAINTS

Table 41.E.9
Fair Housing Complaints by Basis
 41. City of Akron
 2004–2012 FHCS Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Advertising	2									2
Age					1	1		1		3
Ancestry				1						1
Color	3		3	3	3			2		14
Criminal Background					1	1				2
Disability	18	2	51	40	35	30	40	49	25	290
Familial Status	7	1	22	9	16	17	15	22	2	111
Harassment				1	4	3	3			11
National Origin			7	1	4	6	1	2	1	22
Race	13	1	27	17	17	29	18	18	12	152
Retaliation	1		10	7	9	3	3	2	2	37
Sex	4	2	15	8	8	9	7	9	10	72
Other				4	11	5		1		21
None			11							11
Unknown				5						5
Total Bases	48	6	146	96	109	104	87	106	52	754
Total Complaints	39	6	120	79	93	77	71	96	47	628

Table 41.E.10
Fair Housing Complaints by Closure Status
 41. City of Akron
 2004–2012 FHCS Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Closed			45	31	30	40	6	15	2	169
Dismissed			5	1	3					9
Elected not to pursue						5	6	3	7	21
Independently resolved						15	9	11	4	39
Inquiry			31	17	34	2		2	8	94
Lack of jurisdiction					6					6
No contact							27	28	4	59
No probable cause			12	13	9	5	3	5		47
Pending			7	9	2			2	6	26
Probable cause			6	2		1	10	9		28
Reasonable accommodation granted				1			2	6	4	13
Reasonable modification granted							1	1	1	3
Referred for other assistance							2	3	3	8
Settled			14	3	2	8	5	9	6	47
Settled through OCRC					2	1			1	4
Withdrawal of Charge					4			2	1	7
Missing	39	6		2	1					48
Total Complaints	39	6	120	79	93	77	71	96	47	628

THE HOUSING RESEARCH AND ADVOCACY CENTER COMPLAINTS

Table 41.E.11
Fair Housing Complaints by Basis

41 City of Akron
2004–2012 HRAC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Accessibility						1				1
Total Bases	0	0	0	0	0	1	0	0	0	1
Total Complaints						1				1

Table 41.E.12
Fair Housing Complaints by Issue

41 City of Akron
2004–2012 HRAC Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Rental						1				1
Total	0	0	0	0	0	1	0	0	0	1
Total Complaints						1				1

Table 41.E.13
Fair Housing Complaints by Action Taken

41 City of Akron
2004–2012 HRAC Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Fair Housing Info Given						1				1
Total	0	0	0	0	0	1	0	0	0	1
Total Complaints						1				1

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 41.F.1
Primary Role of Respondent

41. City of Akron
2012–2013 Fair Housing Survey for Housing
Stakeholders Data

Primary Role	Total
Advocate/Service Provider	9
Construction/Development	2
Law/Legal Services	2
Local Government	1
Property Management	2
Real Estate	2
Resident Advisory Council Leader	1
Other Role	4
Total	23

FEDERAL, STATE, AND LOCAL LAWS

Table 41.F.2
Familiarity with Fair Housing Laws

41. City of Akron
2012–2013 Fair Housing Survey
for Housing Stakeholders Data

Familiarity	Total
Not Familiar	3
Somewhat Familiar	6
Very Familiar	7
Missing	7
Total	23

Table 41.F.3
Perceptions About Fair Housing Laws

41. City of Akron
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?	12	3	1	7	23
Are fair housing laws difficult to understand or follow?	8	6	1	8	23
Do you think fair housing laws should be changed?	5	4	6	8	23
Do you think fair housing laws are adequately enforced?	10	2	2	9	23

Table 41.F.4
Fair Housing Activities

41. City of Akron
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?		10	2	2	9	23
Have you participated in fair housing training?		9	3	1	10	23
Are you aware of any fair housing testing?		12		2	9	23
Testing and education	Too Little	Right Amount	Too Much	Don't Know	Missing	Total
Is there sufficient outreach and education activity?	4	3	2	5	9	23
Is there sufficient testing?	3	2		9	9	23

Table 41.F.5
Protected Classes

41. City of Akron
2012–2013 Fair Housing Survey
for Housing Stakeholders Data

Protected Class	Total
Family Status	10
Religion	7
Gender	8
National Origin	5
Color	6
Sexual Orientation	2
Age	3
Military	3
Disability	2
Race	1
Other	2
Total	50

Table 41.F.6
Fair Housing Violation Referrals
 41. City of Akron
 2012–2013 Fair Housing Survey for Housing
 Stakeholders Data

Referral	Total
County	1
Fair Housing Advocates Association	5
Fair Housing Contact Service	8
HUD	3
Lawyer	1
Legal Aid	1
OCRC	2
Other	1
Would not refer	2
Total	24

LOCAL FAIR HOUSING

Table 41.F.7
Local Fair Housing
 41. City of Akron
 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	2	1	12	23
Are there any specific geographic areas that have fair housing problems?	1	4	5	13	23
Are there any specific groups in that face housing discrimination?	3	3	5	12	23

FAIR HOUSING IN THE PRIVATE SECTOR

Table 41.F.8
Barriers to Fair Housing in the Private Sector
 41. City of Akron
 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	5	3	9	23
The real estate industry?	2	6	4	11	23
The mortgage and home lending industry?		5	8	10	23
The housing construction or accessible housing design fields?	3	4	6	10	23
The home insurance industry?	1	4	8	10	23
The home appraisal industry?	1	3	9	10	23
Any other housing services?	1	4	7	11	23

FAIR HOUSING IN THE PUBLIC SECTOR

Table 41.F.9
Barriers to Fair Housing in the Public Sector

41. City of Akron
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	3	4	12	23
Zoning laws?	4	3	4	12	23
Occupancy standards or health and safety codes?	2	3	6	12	23
Property tax policies?	2	4	5	12	23
Permitting process?	3	1	7	12	23
Housing construction standards?	3	2	6	12	23
Neighborhood or community development policies?	2	3	6	12	23
Limited access to government services, such as employment services?	2	3	6	12	23
Public administrative actions or regulations?	1	3	7	12	23

NARRATIVE COMMENTS

Federal, State, and Local Laws

Table 41.F.10
How did you become aware of fair housing laws?

41. City of Akron
2013 Fair Housing Survey Data

Comments:
<p>As a landlord, I must know "the rules".</p> <p>Education</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 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>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 trade associations such as HBA and Realtors</p>

Table 41.F.11
How should fair housing laws be changed?

41. City of Akron
2013 Fair Housing Survey Data

Comments:
<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>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>They should be strengthened and the penalties made heavier, especially for municipalities and counties that receive federal funds.</p>

Local Fair Housing**Table 41.F.12****Are there any specific geographic areas that have fair housing problems?**

41. City of Akron

2013 Fair Housing Survey Data

Comments:
Race discrimination is still a problem in suburban areas. Discrimination against persons with disabilities is still rampant.

Table 41.F.13**Are there any specific groups in that face housing discrimination?**

41. City of Akron

2013 Fair Housing Survey Data

Comments:
All of the protected classes. Disabled

Table 41.F.14**Please share any additional comments.**

41. City of Akron

2013 Fair Housing Survey Data

Comments:
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. 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.

Fair Housing in the Private Sector**Table 41.F.15****Are you aware of any questionable practices or barriers to fair housing choice in the rental housing market?**

41. City of Akron

2013 Fair Housing Survey Data

Comments:
Disability , accommodations 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. refusal to rent based on disability Though cases I have seen come through our office. We've referred callers to Fair Housing Contact Services based on alleged discrimination for renters in the area of ADA compliance and familial status.

Table 41.F.16**Are you aware of any questionable practices or barriers to fair housing choice in the real estate industry?**

41. City of Akron

2013 Fair Housing Survey Data

Comments:
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 41.F.17**Are you aware of any questionable practices or barriers to fair housing choice in the housing construction or accessible housing design fields?**

41. City of Akron

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 41.F.18

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

41. City of Akron

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 41.F.19

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

41. City of Akron

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 41.F.20

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

41. City of Akron

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 41.F.21

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

41. City of Akron

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 41.F.22

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

41. City of Akron

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 41.F.23

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

41. City of Akron
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. 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 41.F.24

Are you aware of any questionable practices or barriers to fair housing choice in housing construction standards?

41. City of Akron
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.

Table 41.F.25

Are you aware of any questionable practices or barriers to fair housing choice in neighborhood or community development policies?

41. City of Akron
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 41.F.26

Are you aware of any barriers that limit access to government services, such as a lack of transportation or employment services?

41. City of Akron
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 41.F.27

Are you aware of any questionable practices or barriers to fair housing choice in any other public administrative actions or regulations?

41. City of Akron
2013 Fair Housing Survey Data

Comments:
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.

G. LAND USE PLANNING SURVEY DATA

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. While multiple attempts were made to contact the prospective survey respondents in each community, or the Progress Review Team member for communities where no names were received, in the City of Akron, no planning or development staff responded to complete the interview.

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 Akron. 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 Akron.

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 Akron.*

Results of the Fair Housing Surveys indicate that Akron may not have sufficient policies or practices to completely address the duty to affirmatively further fair housing.

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 Akron, given the size of the fair housing challenges facing Akron. 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 Akron 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 in Akron. 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 41.H.1
Impediments Matrix
 41. City of Akron
 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			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	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

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.

42. CITY OF BARBERTON

A. CENSUS BUREAU DATA

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

Table 42.A.1

Population by Age

42. City of Barberton

2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Under 5	2,147	7.7%	1,744	6.6%	-18.8%
5 to 19	5,427	19.5%	5,132	19.3%	-5.4%
20 to 24	1,701	6.1%	1,536	5.8%	-9.7%
25 to 34	3,824	13.7%	3,331	12.5%	-12.9%
35 to 54	7,648	27.4%	7,029	26.5%	-8.1%
55 to 64	2,338	8.4%	3,390	12.8%	45.0%
65 or Older	4,814	17.3%	4,388	16.5%	-8.8%
Total	27,899	100.0%	26,550	100.0%	-4.8%

Table 42.A.2

Elderly Population by Age

42. City of Barberton

2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
65 to 66	432	9.0%	412	9.4%	-4.6%
67 to 69	657	13.6%	634	14.4%	-3.5%
70 to 74	1,269	26.4%	942	21.5%	-25.8%
75 to 79	1,087	22.6%	829	18.9%	-23.7%
80 to 84	772	16.0%	807	18.4%	4.5%
85 or Older	597	12.4%	764	17.4%	28.0%
Total	4,814	100.0%	4,388	100.0%	-8.8%

Table 42.A.3

Population by Race and Ethnicity

42. City of Barberton

2000 & 2010 Census SF1 Data

Race	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
White	25,787	92.4%	24,113	90.8%	-6.5%
Black	1,488	5.3%	1,555	5.9%	4.5%
American Indian	74	.3%	85	.3%	14.9%
Asian	102	.4%	77	.3%	-24.5%
Native Hawaiian/ Pacific Islander	2	.0%	13	.0%	550.0%
Other	66	.2%	113	.4%	71.2%
Two or More Races	380	1.4%	594	2.2%	56.3%
Total	27,899	100.0%	26,550	100.0%	-4.8%
Non-Hispanic	27,720	99.4%	26,191	98.6%	-5.5%
Hispanic	179	.6%	359	1.4%	100.6%

Table 42.A.4
Disability by Age
 42. City of Barberton
 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	235	10.3%	200	9.7%	435	10.0%
18 to 34	98	3.9%	236	8.3%	334	6.3%
35 to 64	955	17.4%	939	18.0%	1,894	17.7%
65 to 74	238	37.1%	296	27.9%	534	31.4%
75 or Older	311	42.1%	938	55.7%	1,249	51.5%
Total	1,837	14.3%	2,609	19.4%	4,446	16.9%

Table 42.A.5
Employment Status by Disability and Type: Age 18 to 64
 42. City of Barberton
 2010 Three-Year ACS Data

Disability Status	Population
Employed:	11,454
With a disability:	622
With a hearing difficulty	160
With a vision difficulty	68
With a cognitive difficulty	134
With an ambulatory difficulty	279
With a self-care difficulty	45
With an independent living difficulty	112
No disability	10,832
Unemployed:	1,326
With a disability:	312
With a hearing difficulty	43
With a vision difficulty	33
With a cognitive difficulty	124
With an ambulatory difficulty	220
With a self-care difficulty	54
With an independent living difficulty	108
No disability	1,014
Not in labor force:	3,257
With a disability:	1,294
With a hearing difficulty	166
With a vision difficulty	233
With a cognitive difficulty	579
With an ambulatory difficulty	998
With a self-care difficulty	373
With an independent living difficulty	619
No disability	1,963
Total	16,037

Table 42.A.6**Households by Income**

42. City of Barberton

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	2,351	20.3%	2,524	22.2%
\$15,000 to \$19,999	905	7.8%	960	8.4%
\$20,000 to \$24,999	1,075	9.3%	804	7.1%
\$25,000 to \$34,999	1,814	15.7%	1,336	11.7%
\$35,000 to \$49,999	2,234	19.3%	2,179	19.2%
\$50,000 to \$74,999	1,954	16.9%	2,080	18.3%
\$75,000 to \$99,999	691	6.0%	749	6.6%
\$100,000 or More	537	4.6%	744	6.5%
Total	11,561	100.0%	11,376	100.0%

Table 42.A.7**Poverty by Age**

42. City of Barberton

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	649	17.8%	693	12.8%
6 to 17	823	22.5%	1,250	23.1%
18 to 64	1,847	50.5%	2,893	53.4%
65 or Older	337	9.2%	579	10.7%
Total	3,656	100.0%	5,415	100.0%
Poverty Rate	13.3%	.	20.6%	.

Table 42.A.8**Households by Year Home Built**

42. City of Barberton

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	3,819	33.1%	3,703	32.6%
1940 to 1949	1,638	14.2%	1,300	11.4%
1950 to 1959	2,416	20.9%	2,183	19.2%
1960 to 1969	1,327	11.5%	1,250	11.0%
1970 to 1979	1,272	11.0%	1,218	10.7%
1980 to 1989	277	2.4%	481	4.2%
1990 to 1999	791	6.9%	711	6.3%
2000 to 2004	.	.	349	3.1%
2005 or Later	.	.	181	1.6%
Total	11,540	100.0%	11,376	100.0%

Table 42.A.9**Housing Units by Type**

42. City of Barberton

2000 Census SF3 & 2010 Five-Year ACS Data

Unit Type	2000 Census		2010 Five-Year ACS	
	Units	% of Total	Units	% of Total
Single-Family	9,209	75.7%	9,641	77.0%
Duplex	933	7.7%	683	5.5%
Tri- or Four-Plex	644	5.3%	737	5.9%
Apartment	1,210	9.9%	1,273	10.2%
Mobile Home	170	1.4%	183	1.5%
Boat, RV, Van, Etc.	0	.0%	0	.0%
Total	12,166	100.0%	12,517	100.0%

Table 42.A.10**Housing Units by Tenure**

42. City of Barberton

2000 & 2010 Census SF1 Data

Tenure	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
Occupied Housing Units	11,523	94.7%	11,054	90.7%	-4.1%
Owner-Occupied	7,499	65.1%	6,899	62.4%	-8.0%
Renter-Occupied	4,024	34.9%	4,155	37.6%	3.3%
Vacant Housing Units	640	5.3%	1,137	9.3%	77.7%
Total Housing Units	12,163	100.0%	12,191	100.0%	.2%

Table 42.A.11**Disposition of Vacant Housing Units**

42. City of Barberton

2000 & 2010 Census SF1 Data

Disposition	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
For Rent	228	35.6%	334	29.4%	46.5%
For Sale	111	17.3%	237	20.8%	113.5%
Rented or Sold, Not Occupied	88	13.8%	47	4.1%	-46.6%
For Seasonal, Recreational, or Occasional Use	19	3.0%	31	2.7%	63.2%
For Migrant Workers	0	0.0%	0	.0%	%
Other Vacant	194	30.3%	488	42.9%	151.5%
Total	640	100.0%	1,137	100.0%	77.7%

Table 42.A.12**Households by Household Size**

42. City of Barberton

2000 & 2010 Census SF1 Data

Size	2000 Census		2010 Census		% Change 00-10
	Households	% of Total	Households	% of Total	
One Person	3,469	30.1%	3,561	32.2%	2.7%
Two Persons	3,834	33.3%	3,559	32.2%	-7.2%
Three Persons	1,883	16.3%	1,703	15.4%	-9.6%
Four Persons	1,417	12.3%	1,281	11.6%	-9.6%
Five Persons	620	5.4%	615	5.6%	-.8%
Six Persons	196	1.7%	224	2.0%	14.3%
Seven Persons or More	104	.9%	111	1.0%	6.7%
Total	11,523	100.0%	11,054	100.0%	-4.1%

Table 42.A.13
Household Type by Tenure
 42. City of Barberton
 2000 & 2010 Census SF1 Data

Household Type	2000 Census		2010 Census		% Change 00–10
	Households	% of Total	Households	% of Total	
Family Households	7,449	64.6%	6,880	62.2%	-7.6%
Married-Couple Family	5,178	69.5%	4,415	64.2%	-14.7%
Owner-Occupied	4,222	81.5%	3,556	80.5%	-15.8%
Renter-Occupied	956	18.5%	859	19.5%	-10.1%
Other Family	2,271	30.5%	2,465	35.8%	8.5%
Male Householder, No Spouse	497	21.9%	658	26.7%	32.4%
Owner-Occupied	306	61.6%	334	50.8%	9.2%
Renter-Occupied	191	38.4%	324	49.2%	69.6%
Female Householder, No Spouse	1,774	78.1%	1,807	73.3%	1.9%
Owner-Occupied	792	44.6%	760	42.1%	-4.0%
Renter-Occupied	982	55.4%	1,047	57.9%	6.6%
Non-Family Households	4,074	35.4%	4,174	37.8%	2.5%
Owner-Occupied	2,179	53.5%	2,249	53.9%	3.2%
Renter-Occupied	1,895	46.5%	1,925	46.1%	1.6%
Total	11,523	100.0%	11,054	100.0%	-4.1%

Table 42.A.14
Group Quarters Population
 42. City of Barberton
 2000 & 2010 Census SF1 Data

Group Quarters Type	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Institutionalized					
Correctional Institutions	0	.0%	0	.0%	%
Juvenile Facilities	.	.	0	.0%	.
Nursing Homes	238	74.6%	259	100.0%	8.8%
Other Institutions	81	25.4%	0	.0%	-100.0%
Total	319	100.0%	259	100.0%	-18.8%
Noninstitutionalized					
College Dormitories	0	.0%	0	.0%	%
Military Quarters	0	.0%	0	.0%	%
Other Noninstitutional	75	100.0%	112	100.0%	49.3%
Total	75	19.0%	112	30.2%	49.3%
Total Group Quarters Population	394	100.0%	371	100.0%	-5.8%

Table 42.A.15
Overcrowding and Severe Overcrowding
 42. City of Barberton
 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	7,474	98.9%	56	.7%	29	.4%	7,559
2010 ACS	7,281	99.4%	46	.6%	0	.0%	7,327
Renter							
2000 Census	3,894	97.8%	57	1.4%	30	.8%	3,981
2010 ACS	4,004	98.9%	45	1.1%	0	.0%	4,049
Total							
2000 Census	11,368	98.5%	113	1.0%	59	.5%	11,540
2010 ACS	11,285	99.2%	91	.8%	0	.0%	11,376

Table 42.A.16
Households with Incomplete Plumbing Facilities
 42. City of Barberton
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Plumbing Facilities	11,492	11,269
Lacking Complete Plumbing Facilities	48	107
Total Households	11,540	11,376
Percent Lacking	.4%	.9%

Table 42.A.17
Households with Incomplete Kitchen Facilities
 42. City of Barberton
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Kitchen Facilities	11,499	11,291
Lacking Complete Kitchen Facilities	41	85
Total Households	11,540	11,376
Percent Lacking	.4%	.7%

Table 42.A.18
Cost Burden and Severe Cost Burden by Tenure
 42. City of Barberton
 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	3,231	74.2%	803	18.4%	306	7.0%	14	.3%	4,354
2010 ACS	2,507	58.5%	1,077	25.1%	704	16.4%	0	.0%	4,288
Owner Without a Mortgage									
2000 Census	2,481	89.9%	131	4.7%	93	3.4%	55	2.0%	2,760
2010 ACS	2,368	77.9%	463	15.2%	184	6.1%	24	.8%	3,039
Renter									
2000 Census	2,221	55.8%	854	21.5%	613	15.4%	293	7.4%	3,981
2010 ACS	1,976	48.8%	664	16.4%	1,016	25.1%	393	9.7%	4,049
Total									
2000 Census	7,933	71.5%	1,788	16.1%	1,012	9.1%	362	3.3%	11,095
2010 ACS	6,851	60.2%	2,204	19.4%	1,904	16.7%	417	3.7%	11,376

Table 42.A.19
Median Housing Costs
 42. City of Barberton
 2000 Census SF3 & 2010 Five-Year ACS Data

Housing Cost	2000 Census	2010 ACS
Median Contract Rent	\$380	\$474
Median Home Value	\$78,800	\$96,600

B. BLS DATA

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

Table 42.B.1
Labor Force Statistics
 42. City of Barberton
 1990–2011 BLS Data

Year	Labor Force	Employment	Unemployment	Unemployment Rate	Statewide Unemployment Rate
1990	12,221	11,390	831	6.8%	5.7%
1991	12,419	11,428	991	8.0%	6.6%
1992	12,696	11,540	1,156	9.1%	7.4%
1993	12,741	11,704	1,037	8.1%	6.7%
1994	12,954	12,086	868	6.7%	5.6%
1995	13,051	12,251	800	6.1%	4.9%
1996	13,225	12,386	839	6.3%	5.0%
1997	13,262	12,462	800	6.0%	4.6%
1998	13,155	12,428	727	5.5%	4.3%
1999	13,274	12,515	759	5.7%	4.3%
2000	13,567	12,805	762	5.6%	4.0%
2001	13,588	12,747	841	6.2%	4.4%
2002	13,689	12,589	1,100	8.0%	5.7%
2003	13,285	12,342	943	7.1%	6.2%
2004	13,305	12,385	920	6.9%	6.1%
2005	13,429	12,531	898	6.7%	5.9%
2006	13,534	12,704	830	6.1%	5.4%
2007	13,559	12,649	910	6.7%	5.6%
2008	13,558	12,556	1,002	7.4%	6.5%
2009	13,590	11,922	1,668	12.3%	10.1%
2010	13,222	11,693	1,529	11.6%	10.0%
2011	12,932	11,680	1,252	9.7%	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 42.C.1
Purpose of Loan by Year
42. City of Barberton
2004–2011 HMDA Data

Purpose	2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	832	913	936	511	394	382	240	285	4,493
Home Improvement	290	344	343	271	223	140	86	96	1,793
Refinancing	2,134	2,033	1,685	1,040	619	659	550	424	9,144
Total	3,256	3,290	2,964	1,822	1,236	1,181	876	805	15,430

Table 42.C.2
Occupancy Status for Home Purchase Loan Applications
42. City of Barberton
2004–2011 HMDA Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	Total
Owner-Occupied	720	807	802	457	352	368	220	262	3,988
Not Owner-Occupied	102	103	132	50	36	14	20	22	479
Not Applicable	10	3	2	4	6	0	0	1	26
Total	832	913	936	511	394	382	240	285	4,493

Table 42.C.3
Owner-Occupied Home Purchase Loan Applications by Loan Type
42. City of Barberton
2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Conventional	585	657	691	342	123	101	47	79	2,625
FHA - Insured	127	139	96	92	219	251	155	163	1,242
VA - Guaranteed	8	11	15	23	10	15	18	20	120
Rural Housing Service or Farm Service Agency	0	0	0	0	0	1	0	0	1
Total	720	807	802	457	352	368	220	262	3,988

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 42.C.4
Loan Applications by Action Taken
 42. City of Barberton
 2004–2011 HMDA Data

Action	2004	2005	2006	2007	2008	2009	2010	2011	Total
Loan Originated	378	426	379	252	186	180	112	110	2,023
Application Approved but not Accepted	45	43	48	12	9	9	7	4	177
Application Denied	92	91	111	46	29	31	19	25	444
Application Withdrawn by Applicant	51	64	55	25	19	15	8	11	248
File Closed for Incompleteness	11	14	8	6	0	7	4	2	52
Loan Purchased by the Institution	143	168	201	116	109	126	70	110	1,043
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	720	807	802	457	352	368	220	262	3,988
Denial Rate	19.6%	17.6%	22.7%	15.4%	13.5%	14.7%	14.5%	18.5%	18.0%

Table 42.C.5
Denial Rates by Gender of Applicant
 42. City of Barberton
 2004–2011 HMDA Data

Year	Male	Female	Not Available	Not Applicable	Average
2004	15.3%	24.5%	64.3%	%	19.6%
2005	17.6%	17.6%	16.7%	%	17.6%
2006	21.5%	24.0%	37.5%	%	22.7%
2007	14.8%	16.3%	18.2%	%	15.4%
2008	14.2%	11.8%	16.7%	%	13.5%
2009	15.1%	10.4%	50.0%	%	14.7%
2010	12.5%	13.5%	42.9%	%	14.5%
2011	18.5%	11.1%	55.6%	%	18.5%
Average	16.9%	18.2%	40.6%	%	18.0%

Table 42.C.6
Loan Applications by Selected Action Taken by Gender of Applicant
 42. City of Barberton
 2004–2011 HMDA Data

Gender		2004	2005	2006	2007	2008	2009	2010	2011	Total
Male	Originated	265	257	241	161	121	107	63	66	1,281
	Denied	48	55	66	28	20	19	9	15	260
	Denial Rate	15.3%	17.6%	21.5%	14.8%	14.2%	15.1%	12.5%	18.5%	16.9%
Female	Originated	108	164	133	82	60	69	45	40	701
	Denied	35	35	42	16	8	8	7	5	156
	Denial Rate	24.5%	17.6%	24.0%	16.3%	11.8%	10.4%	13.5%	11.1%	18.2%
Not Available	Originated	5	5	5	9	5	4	4	4	41
	Denied	9	1	3	2	1	4	3	5	28
	Denial Rate	64.3%	16.7%	37.5%	18.2%	16.7%	50.0%	42.9%	55.6%	40.6%
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	378	426	379	252	186	180	112	110	2,023
	Denied	92	91	111	46	29	31	19	25	444
	Denial Rate	19.6%	17.6%	22.7%	15.4%	13.5%	14.7%	14.5%	18.5%	18.0%

Table 42.C.7
Denial Rates by Race/Ethnicity of Applicant
 42. City of Barberton
 2004–2011 HMDA Data

Race/Ethnicity	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	50.0%	.0%	75.0%	%	%	%	.0%	%	44.4%
Asian	100.0%	50.0%	100.0%	.0%	.0%	.0%	%	.0%	27.3%
Black	12.5%	50.0%	26.1%	.0%	50.0%	.0%	.0%	.0%	27.8%
White	17.1%	15.2%	21.0%	15.4%	12.3%	13.9%	14.0%	16.0%	16.3%
Not Available	48.5%	24.2%	34.5%	20.0%	25.0%	36.4%	40.0%	60.0%	34.6%
Not Applicable	%	%	%	%	%	0%	0%	%	%
Average	19.6%	17.6%	22.7%	15.4%	13.5%	14.7%	14.5%	18.5%	18.0%
Non-Hispanic	16.1%	17.1%	21.4%	15.2%	13.7%	12.8%	13.9%	14.8%	16.6%
Hispanic	28.6%	.0%	16.7%	20.0%	.0%	40.0%	.0%	50.0%	19.4%

Table 42.C.8
Loan Applications by Selected Action Taken by Race/Ethnicity of Applicant
 42. City of Barberton
 2004–2011 HMDA Data

Race		2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Originated	1	1	1	0	0	0	2	0	5
	Denied	1	0	3	0	0	0	0	0	4
	Denial Rate	50.0%	.0%	75.0%	%	%	.0%	.0%	%	44.4%
Asian	Originated	0	1	0	1	4	1	0	1	8
	Denied	1	1	1	0	0	0	0	0	3
	Denial Rate	100.0%	50.0%	100.0%	.0%	.0%	.0%	%	.0%	27.3%
Black	Originated	7	13	17	5	2	5	3	5	57
	Denied	1	13	6	0	2	0	0	0	22
	Denial Rate	12.5%	50.0%	26.1%	.0%	50.0%	.0%	.0%	.0%	27.8%
White	Originated	353	386	342	230	171	167	104	100	1,853
	Denied	73	69	91	42	24	27	17	19	362
	Denial Rate	17.1%	15.2%	21.0%	15.4%	12.3%	13.9%	14.0%	16.0%	16.3%
Not Available	Originated	17	25	19	16	9	7	3	4	100
	Denied	16	8	10	4	3	4	2	6	53
	Denial Rate	48.5%	24.2%	34.5%	20.0%	25.0%	36.4%	40.0%	60.0%	34.6%
Not Applicable	Originated	0	0	0	0	0	0	0	0	0
	Denied	0	0	0	0	0	0	0	0	0
	Denial Rate	48.5%	24.2%	34.5%	20.0%	25.0%	36.4%	40.0%	60.0%	%
Total	Originated	378	426	379	252	186	180	112	110	2,023
	Denied	92	91	111	46	29	31	19	25	444
	Denial Rate	19.6%	17.6%	22.7%	15.4%	13.5%	14.7%	14.5%	18.5%	18.0%
Non-Hispanic	Originated	333	393	360	229	170	171	105	104	1,865
	Denied	64	81	98	41	27	25	17	18	371
	Denial Rate	16.1%	17.1%	21.4%	15.2%	13.7%	12.8%	13.9%	14.8%	16.6%
Hispanic	Originated	5	7	5	4	3	3	1	1	29
	Denied	2	0	1	1	0	2	0	1	7
	Denial Rate	28.6%	.0%	16.7%	20.0%	.0%	40.0%	.0%	50.0%	19.4%

Table 42.C.9
Loan Applications by Reason for Denial
 42. City of Barberton
 2004–2011 HMDA Data

Denial Reason	2004	2005	2006	2007	2008	2009	2010	2011	Total
Debt-to-Income Ratio	15	9	12	4	5	10	7	0	62
Employment History	2	2	0	1	0	1	1	3	10
Credit History	18	21	31	11	2	4	2	2	91
Collateral	8	6	8	6	5	6	0	7	46
Insufficient Cash	1	0	2	1	2	1	1	2	10
Unverifiable Information	6	8	0	1	1	1	1	1	19
Credit Application Incomplete	6	4	8	4	4	2	1	4	33
Mortgage Insurance Denied	0	0	0	0	0	0	0	0	0
Other	20	24	18	4	2	3	3	3	77
Missing	16	17	32	14	8	3	3	3	96
Total	92	91	111	46	29	31	19	25	444

Table 42.C.10
Denial Rates by Income of Applicant
 42. City of Barberton
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	45.5%	50.0%	37.5%	40.0%	%	50.0%	50.0%	50.0%	46.0%
\$15,001–\$30,000	24.5%	23.9%	28.1%	16.7%	11.7%	17.4%	10.4%	23.4%	21.4%
\$30,001–\$45,000	16.3%	12.9%	22.0%	14.6%	12.9%	9.2%	15.2%	19.4%	15.6%
\$45,001–\$60,000	16.7%	17.3%	16.5%	15.8%	16.7%	11.4%	17.4%	4.2%	15.6%
\$60,001–\$75,000	15.8%	7.0%	20.0%	16.7%	12.5%	11.1%	.0%	18.2%	13.8%
Above \$75,000	10.3%	20.7%	18.4%	9.7%	12.5%	15.4%	17.6%	20.0%	15.3%
Data Missing	31.3%	15.4%	35.7%	16.7%	100.0%	100.0%	.0%	%	28.3%
Total	19.6%	17.6%	22.7%	15.4%	13.5%	14.7%	14.5%	18.5%	18.0%

Table 42.C.11
Denial Rates of Loans by Race/Ethnicity and Income of Applicant
 42. City of Barberton
 2004–2011 HMDA Data

Race	<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	Above \$75K	Data Missing	Average
American Indian	%	66.7%	50.0%	.0%	%	.0%	%	44.4%
Asian	%	40.0%	.0%	%	.0%	100.0%	%	27.3%
Black	%	38.1%	21.7%	50.0%	.0%	.0%	%	27.8%
White	46.7%	18.7%	14.0%	14.2%	14.3%	14.4%	24.0%	16.3%
Not Available	40.0%	51.3%	31.6%	14.3%	15.4%	33.3%	100.0%	34.6%
Not Applicable	%	%	%	%	%	%	%	%
Average	46.0%	21.4%	15.6%	15.6%	13.8%	15.3%	28.3%	18.0%
Non-Hispanic Ethnicity	46.3%	19.2%	14.2%	15.0%	14.9%	14.0%	20.8%	16.6%
Hispanic (Ethnicity)	66.7%	20.0%	10.0%	33.3%	.0%	.0%	%	19.4%

Table 42.C.12
Loan Applications by Reason for Denial by Race/Ethnicity of Applicant
 42. City of Barberton
 2004–2011 HMDA Data

Denial Reason	American Indian	Asian	Black	White	Not Available	Not Applicable	Total	Hispanic (Ethnicity)
Debt-to-Income Ratio	1	0	1	55	5	0	62	3
Employment History	0	0	0	10	0	0	10	1
Credit History	1	2	6	74	8	0	91	1
Collateral	1	0	0	41	4	0	46	0
Insufficient Cash	0	1	0	6	3	0	10	0
Unverifiable Information	0	0	1	16	2	0	19	0
Credit Application Incomplete	1	0	2	25	5	0	33	1
Mortgage Insurance Denied	0	0	0	0	0	0	0	0
Other	0	0	8	56	13	0	77	1
Missing	0	0	4	79	13	0	96	0
Total	4	3	22	362	53	0	444	7
% Missing	.0%	.0%	18.2%	21.8%	24.5%	%	21.6%	.0%

Table 42.C.13
Loan Applications by Income of Applicant: Originated and Denied
 42. City of Barberton
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Loan Originated	6	6	5	3	0	4	2	1	27
	Application Denied	5	6	3	2	0	4	2	1	23
	Denial Rate	45.5%	50.0%	37.5%	40.0%	%	50.0%	50.0%	50.0%	46.0%
\$15,001–\$30,000	Loan Originated	111	105	92	60	53	57	43	36	557
	Application Denied	36	33	36	12	7	12	5	11	152
	Denial Rate	24.5%	23.9%	28.1%	16.7%	11.7%	17.4%	10.4%	23.4%	21.4%
\$30,001–\$45,000	Loan Originated	123	155	124	88	61	69	28	25	673
	Application Denied	24	23	35	15	9	7	5	6	124
	Denial Rate	16.3%	12.9%	22.0%	14.6%	12.9%	9.2%	15.2%	19.4%	15.6%
\$45,001–\$60,000	Loan Originated	60	86	81	48	30	31	19	23	378
	Application Denied	12	18	16	9	6	4	4	1	70
	Denial Rate	16.7%	17.3%	16.5%	15.8%	16.7%	11.4%	17.4%	4.2%	15.6%
\$60,001–\$75,000	Loan Originated	32	40	28	20	21	8	4	9	162
	Application Denied	6	3	7	4	3	1	0	2	26
	Denial Rate	15.8%	7.0%	20.0%	16.7%	12.5%	11.1%	.0%	18.2%	13.8%
Above \$75,000	Loan Originated	35	23	40	28	21	11	14	16	188
	Application Denied	4	6	9	3	3	2	3	4	34
	Denial Rate	10.3%	20.7%	18.4%	9.7%	12.5%	15.4%	17.6%	20.0%	15.3%
Data Missing	Loan Originated	11	11	9	5	0	0	2	0	38
	Application Denied	5	2	5	1	1	1	0	0	15
	Denial Rate	31.3%	15.4%	35.7%	16.7%	100.0%	100.0%	.0%	%	28.3%
Total	Loan Originated	378	426	379	252	186	180	112	110	2,023
	Application Denied	92	91	111	46	29	31	19	25	444
	Denial Rate	19.6%	17.6%	22.7%	15.4%	13.5%	14.7%	14.5%	18.5%	18.0%

Table 42.C.14
Loan Applications by Income and Race/Ethnicity of Applicant: Originated and Denied
 42. City of Barberton
 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	1	0	1	0	5
	Application Denied	0	2	2	0	0	0	0	4
	Denial Rate	%	66.7%	50.0%	.0%	%	.0%	%	44.4%
Asian	Loan Originated	0	3	4	0	1	0	0	8
	Application Denied	0	2	0	0	0	1	0	3
	Denial Rate	%	40.0%	.0%	%	.0%	100.0%	%	27.3%
Black	Loan Originated	0	13	18	9	6	11	0	57
	Application Denied	0	8	5	9	0	0	0	22
	Denial Rate	%	38.1%	21.7%	50.0%	.0%	.0%	%	27.8%
White	Loan Originated	24	521	610	350	144	166	38	1,853
	Application Denied	21	120	99	58	24	28	12	362
	Denial Rate	46.7%	18.7%	14.0%	14.2%	14.3%	14.4%	24.0%	16.3%
Not Available	Loan Originated	3	19	39	18	11	10	0	100
	Application Denied	2	20	18	3	2	5	3	53
	Denial Rate	40.0%	51.3%	31.6%	14.3%	15.4%	33.3%	100.0%	34.6%
Not Applicable	Loan Originated	0	0	0	0	0	0	0	0
	Application Denied	0	0	0	0	0	0	0	0
	Denial Rate	%	%	%	%	%	%	%	%
Total	Loan Originated	27	557	673	378	162	188	38	2,023
	Application Denied	23	152	124	70	26	34	15	444
	Denial Rate	46.0%	21.4%	15.6%	15.6%	13.8%	15.3%	28.3%	18.0%
Non-Hispanic Ethnicity	Loan Originated	22	529	617	350	143	166	38	1,865
	Application Denied	19	126	102	62	25	27	10	371
	Denial Rate	46.3%	19.2%	14.2%	15.0%	14.9%	14.0%	20.8%	16.6%
Hispanic (Ethnicity)	Loan Originated	1	4	9	6	4	5	0	29
	Application Denied	2	1	1	3	0	0	0	7
	Denial Rate	66.7%	20.0%	10.0%	33.3%	.0%	.0%	%	19.4%

PREDATORY LENDING

Table 42.C.15
Originated Owner-Occupied Loans by HAL Status
 42. City of Barberton
 2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Other	303	270	238	218	156	164	111	110	1,570
HAL	75	156	141	34	30	16	1	0	453
Total	378	426	379	252	186	180	112	110	2,023
Percent HAL	19.8%	36.6%	37.2%	13.5%	16.1%	8.9%	.9%	.0%	22.4%

Table 42.C.16
Loans by Loan Purpose by HAL Status
 42. City of Barberton
 2004–2011 HMDA Data

Loan Purpose		2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	Other	303	270	238	218	156	164	111	110	1,570
	HAL	75	156	141	34	30	16	1	0	453
	Percent HAL	19.8%	36.6%	37.2%	13.5%	16.1%	8.9%	.9%	.0%	22.4%
Home Improvement	Other	76	85	93	78	73	40	35	31	511
	HAL	31	32	25	19	5	2	0	0	114
	Percent HAL	29.0%	27.4%	21.2%	19.6%	6.4%	4.8%	.0%	.0%	18.2%
Refinancing	Other	526	371	251	193	135	197	230	162	2,065
	HAL	147	197	180	67	32	27	4	3	657
	Percent HAL	21.8%	34.7%	41.8%	25.8%	19.2%	12.1%	1.7%	1.8%	24.1%
Total	Other	905	726	582	489	364	401	376	303	4,146
	HAL	253	385	346	120	30	16	1	0	1,224
	Percent HAL	21.8%	34.7%	37.3%	19.7%	15.5%	10.1%	1.3%	1.0%	22.8%

Table 42.C.17
HALs Originated by Race of Borrower
 42. City of Barberton
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	1	0	0	0	0	0	0	0	1
Asian	0	0	0	0	3	0	0	0	3
Black	4	9	13	1	0	0	0	0	27
White	61	130	113	28	25	16	1	0	374
Not Available	9	17	15	5	2	0	0	0	48
Not Applicable	0	0	0	0	0	0	0	0	0
Total	75	156	141	34	30	16	1	0	453
Hispanic (Ethnicity)	1	4	4	1	0	1	0	0	11

Table 42.C.18
Rate of HALs Originated by Race/Ethnicity of Borrower
 42. City of Barberton
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	100.0%	.0%	.0%	%	%	%	.0%	%	20.0%
Asian	%	.0%	%	.0%	75.0%	.0%	%	.0%	37.5%
Black	57.1%	69.2%	76.5%	20.0%	.0%	.0%	.0%	.0%	47.4%
White	17.3%	33.7%	33.0%	12.2%	14.6%	9.6%	1.0%	.0%	20.2%
Not Available	52.9%	68.0%	78.9%	31.3%	22.2%	.0%	.0%	.0%	48.0%
Not Applicable	%	%	%	%	%	%	%	%	%
Average	19.8%	36.6%	37.2%	13.5%	16.1%	8.9%	0.9%	0.0%	22.4%
Non-Hispanic Ethnicity	17.1%	35.1%	35.6%	12.2%	15.9%	8.8%	1.0%	%	%
Hispanic (Ethnicity)	20.0%	57.1%	80.0%	25.0%	.0%	33.3%	.0%	.0%	37.9%

Table 42.C.19
Loans by HAL Status by Race/Ethnicity of Borrower
 42. City of Barberton
 2004–2011 HMDA Data

Race	Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Other	0	1	1	0	0	0	2	0	4
	HAL	1	0	0	0	0	0	0	0	1
	Percent HAL	100.0%	.0%	.0%	%	%	%	.0%	%	20.0%
Asian	Other	0	1	0	1	1	1	0	1	5
	HAL	0	0	0	0	3	0	0	0	3
	Percent HAL	%	.0%	%	.0%	75.0%	.0%	%	.0%	37.5%
Black	Other	3	4	4	4	2	5	3	5	30
	HAL	4	9	13	1	0	0	0	0	27
	Percent HAL	57.1%	69.2%	76.5%	20.0%	.0%	.0%	.0%	.0%	47.4%
White	Other	292	256	229	202	146	151	103	100	1,479
	HAL	61	130	113	28	25	16	1	0	374
	Percent HAL	17.3%	33.7%	33.0%	12.2%	14.6%	9.6%	01.0%	0.0%	20.2%
Not Available	Other	8	8	4	11	7	7	3	4	52
	HAL	9	17	15	5	2	0	0	0	48
	Percent HAL	52.9%	68.0%	78.9%	31.3%	22.2%	.0%	.0%	.0%	48.0%
Not Applicable	Other	0	0	0	0	0	0	0	0	0
	HAL	0	0	0	0	0	0	0	0	0
	Percent HAL	%	%	%	%	%	%	%	%	.0%
Total	Other	303	270	238	218	156	164	111	110	1,570
	HAL	75	156	141	34	30	16	1	0	453
	Percent HAL	19.8%	36.6%	37.2%	13.5%	16.1%	8.9%	.9%	.0%	22.4%
Non-Hispanic Ethnicity	Other	276	255	232	201	143	156	104	104	1,471
	HAL	57	138	128	28	27	15	1		
	Percent HAL	17.1%	35.1%	35.6%	12.2%	15.9%	8.8%	1.0%	%	%
Hispanic (Ethnicity)	Other	4	3	1	3	3	2	1	1	18
	HAL	1	4	4	1	0	1	0	0	11
	Percent HAL	20.0%	57.1%	80.0%	25.0%	.0%	33.3%	.0%	.0%	37.9%

Table 42.C.20
Rates of HALs by Income of Borrower
 42. City of Barberton
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Average
\$15,000 or Below	33.3%	33.3%	20.0%	.0%	%	.0%	.0%	.0%	18.5%
\$15,001–\$30,000	17.1%	39.0%	38.0%	20.0%	20.8%	14.0%	2.3%	.0%	22.8%
\$30,001–\$45,000	24.4%	36.1%	37.9%	12.5%	21.3%	5.8%	.0%	.0%	23.9%
\$45,001–\$60,000	26.7%	38.4%	40.7%	16.7%	13.3%	9.7%	.0%	.0%	25.7%
\$60,001–\$75,000	6.3%	40.0%	35.7%	10.0%	4.8%	.0%	.0%	.0%	19.1%
Above \$75,000	11.4%	17.4%	25.0%	3.6%	4.8%	9.1%	0.0%	.0%	11.2%
Data Missing	18.2%	36.4%	55.6%	.0%	%	%	.0%	%	28.9%
Average	19.8%	36.6%	37.2%	13.5%	16.1%	8.9%	.9%	.0%	22.4%

Table 42.C.21
Loans by HAL Status by Income of Borrower
 42. City of Barberton
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Other	4	4	4	3	0	4	2	1	22
	HAL	2	2	1	0	0	0	0	0	5
	Percent HAL	33.3%	33.3%	20.0%	.0%	%	.0%	.0%	.0%	18.5%
\$15,001–\$30,000	Other	92	64	57	48	42	49	42	36	430
	HAL	19	41	35	12	11	8	1	0	127
	Percent HAL	17.1%	39.0%	38.0%	20.0%	20.8%	14.0%	2.3%	.0%	22.8%
\$30,001–\$45,000	Other	93	99	77	77	48	65	28	25	512
	HAL	30	56	47	11	13	4	0	0	161
	Percent HAL	24.4%	36.1%	37.9%	12.5%	21.3%	5.8%	.0%	.0%	23.9%
\$45,001–\$60,000	Other	44	53	48	40	26	28	19	23	281
	HAL	16	33	33	8	4	3	0	0	97
	Percent HAL	26.7%	38.4%	40.7%	16.7%	13.3%	9.7%	.0%	.0%	25.7%
\$60,001–\$75,000	Other	30	24	18	18	20	8	4	9	131
	HAL	2	16	10	2	1	0	0	0	31
	Percent HAL	6.3%	40.0%	35.7%	10.0%	4.8%	.0%	.0%	.0%	19.1%
Above \$75,000	Other	31	19	30	27	20	10	14	16	167
	HAL	4	4	10	1	1	1	0	0	21
	Percent HAL	11.4%	17.4%	25.0%	3.6%	4.8%	9.1%	.0%	.0%	11.2%
Data Missing	Other	9	7	4	5	0	0	2	0	27
	HAL	2	4	5	0	0	0	0	0	11
	Percent HAL	18.2%	36.4%	55.6%	.0%	%	%	.0%	%	28.9%
Total	Other	303	270	238	218	156	164	111	110	1,570
	HAL	75	156	141	34	30	16	1	0	453
	Percent HAL	19.8%	36.6%	37.2%	13.5%	16.1%	8.9%	.9%	.0%	22.4%

D. CRA DATA

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

Table 42.D.1
Small Business Loans Originated: \$100,000 or Less by Tract MFI
 42. City of Barberton
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000		164	319			483
2001		203	363			566
2002		239	228			467
2003	157	131	179			467
2004	139	141	167			447
2005	126	150	207			483
2006	146	230	279			655
2007	159	263	309			731
2008	113	190	257			560
2009	51	78	99			228
2010	35	53	76			164
2011	57	76	101			234
Total	983	1,918	2,584	0	0	5,485
Loan Amount (\$1,000s)						
2000		3,313	3,701			7,014
2001		2,679	3,938			6,617
2002		3,122	2,751			5,873
2003	1,815	1,785	1,702			5,302
2004	1,570	1,900	1,783			5,253
2005	1,800	1,417	2,359			5,576
2006	1,563	3,050	2,960			7,573
2007	2,502	3,424	3,365			9,291
2008	1,471	2,305	3,150			6,926
2009	896	830	983			2,709
2010	456	974	916			2,346
2011	736	816	1,842			3,394
Total	12,809	25,615	29,450	0	0	67,874

Table 42.D.2
Small Business Loans Originated: \$100,001 to \$250,000 by Tract MFI
 42. City of Barberton
 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	5			11
2001		17	8			25
2002		14	15			29
2003	2	6	11			19
2004	2	6	13			21
2005	6	8	6			20
2006	7	11	4			22
2007	7	10	8			25
2008	1	4	4			9
2009	5	1	4			10
2010	3	6	2			11
2011	4	2	2			8
Total	37	91	82	0	0	210
Loan Amount (\$1,000s)						
2000		1,115	825			1,940
2001		2,830	1,579			4,409
2002		2,535	2,578			5,113
2003	369	1,118	2,053			3,540
2004	359	1,163	2,311			3,833
2005	905	1,286	1,197			3,388
2006	1,135	2,141	822			4,098
2007	1,146	1,728	1,413			4,287
2008	108	658	527			1,293
2009	721	225	667			1,613
2010	497	995	315			1,807
2011	751	386	390			1,527
Total	5,991	16,180	14,677	0	0	36,848

Table 42.D.3
Small Business Loans Originated: More than \$250,000 by Tract MFI
 42. City of Barberton
 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	2			9
2001		9	3			12
2002		14	6			20
2003	3	4	3			10
2004	4	11	3			18
2005	7	11	6			24
2006	3	13	11			27
2007	4	9	6			19
2008	8	2	3			13
2009	1	2	2			5
2010	5	5	4			14
2011	8	0	5			13
Total	43	87	54	0	0	184
Loan Amount (\$1,000s)						
2000		3,530	800			4,330
2001		5,947	1,500			7,447
2002		9,059	3,180			12,239
2003	2,417	2,745	1,011			6,173
2004	2,458	5,937	1,500			9,895
2005	5,135	6,249	3,580			14,964
2006	2,050	6,076	5,690			13,816
2007	2,600	5,917	2,969			11,486
2008	5,078	672	1,200			6,950
2009	600	1,835	1,700			4,135
2010	3,405	2,608	2,144			8,157
2011	5,196	0	2,286			7,482
Total	28,939	50,575	27,560	0	0	107,074

Table 42.D.4
Small Business Loans to Businesses with Gross Annual Revenues of Less Than \$1 Million by Tract MFI
 42. City of Barberton
 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	244			331
2001		78	270			348
2002		71	76			147
2003	53	34	60			147
2004	58	44	45			147
2005	62	65	85			212
2006	45	94	115			254
2007	64	89	111			264
2008	46	51	72			169
2009	28	20	32			80
2010	21	15	26			62
2011	27	37	46			110
Total	404	685	1,182	0	0	2,271
Loan Amount (\$1,000s)						
2000		3,308	3,320			6,628
2001		2,444	3,515			5,959
2002		3,673	3,868			7,541
2003	1,723	1,989	2,564			6,276
2004	1,545	1,825	1,884			5,254
2005	2,633	4,156	2,839			9,628
2006	1,774	2,742	2,710			7,226
2007	2,080	2,382	2,926			7,388
2008	1,743	996	1,430			4,169
2009	952	134	665			1,751
2010	867	746	601			2,214
2011	1,609	407	1,436			3,452
Total	14,926	24,802	27,758	0	0	67,486

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 42.E.1
Fair Housing Complaints by Basis
42. City of Barberton
2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability	2	2		1		2	1	4		12
Family Status	2					1	4			7
National Origin	1		1							2
Race	2	1	5							8
Sex		1				2	2			5
Total Bases	7	4	6	1		5	7	4		34
Total Complaints	6	3	6	1		4	7	4		31

Table 42.E.2
Fair Housing Complaints by Issue
42. City of Barberton
2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Discriminatory advertisement - rental						2	5			7
Discriminatory refusal to rent		2	3							5
Discriminatory terms, conditions, privileges, or services and facilities	1		2					2		5
Discrimination in terms, conditions or privileges relating to rental			1	1			1	1		4
Discriminatory acts under Section 818 (coercion, etc.)							2	2		4
Discriminatory refusal to rent and negotiate for rental	2									2
Other discriminatory acts	1						1			2
Failure to make reasonable accommodation	2	1		1		2	1	3		10
Total Issues	6	3	6	2	0	4	10	8	0	39
Total Complaints	6	3	6	1		4	7	4		31

Table 42.E.3
Fair Housing Complaints by Closure Status
42. City of Barberton
2004–2012 HUD Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Administrative Closure		1				1				2
Cause (FHAP)			1				2			3
Charged (HUD)						1				1
Conciliated / Settled	1		4				2	3		10
No Cause	5	2	1	1		2	3			14
Open								1		1
Total Complaints	6	3	6	1		4	7	4		31

HUD Complaints Found With Cause

Table 42.E.4
Fair Housing Complaints Found With Cause by Basis
 42. City of Barberton
 2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability	1							3		4
Family Status						1	4			5
National Origin	1		1							2
Race			4							4
Sex						1				1
Total Bases	2		5			2	4	3		16
Total Complaints	1		5			1	4	3		14

Table 42.E.5
Fair Housing Complaints Found With Cause by Issue
 42. City of Barberton
 2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Discriminatory advertisement - rental						1	4			5
Failure to make reasonable accommodation		1						3		4
Discriminatory terms, conditions, privileges, or services and facilities			2					1		3
Discriminatory refusal to rent			2							2
Discrimination in terms, conditions or privileges relating to rental			1					1		2
Discriminatory acts under Section 818 (coercion, etc.)								1		1
Total Issues	1	0	5	0	0	1	4	6	0	17
Total Complaints	1		5			1	4	3		14

OHIO CIVIL RIGHTS COMMISSION COMPLAINTS

Table 42.E.6
Fair Housing Complaints by Basis
 42. City of Barberton
 2004–2012 OCRRC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color			2							2
Disability	1	2				1		5		9
Family Status	2					1	3			6
Gender		1		1		2				4
National Origin	1		1							2
Race	1		4		1					6
Retaliation				1						1
Total Bases	5	3	7	2	0	5	3	5	0	30
Total Complaints	4	2	4	1		2	3	5		21

Table 42.E.7
Fair Housing Complaints by Issue
 42. City of Barberton
 2004–2012 OCRC Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Advertising							1			1
Other	2	1	1				1	2		7
Reasonable Accommodation	1									1
Sexual Harassment				1						1
Terms and Conditions	2	1	4	1		2	2	3		15
Total Issues	5	2	5	2	0	2	4	5	0	25
Total Complaints	4	2	4	1		2	3	5		21

Table 42.E.8
Fair Housing Complaints by Closure Status
 42. City of Barberton
 2004–2012 OCRC Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Administrative Closure								2		2
CP Failed to Cooperate				1						1
CP Withdrawal – No Benefit		1								1
No Cause Finding Issued	2	1	1				2			6
Settlement With Benefits			2			1	1	3		7
Successful Conciliation			1							1
Withdrawal With Benefits	2					1				3
Total Complaints	4	2	4	1	0	2	3	5	0	21

FAIR HOUSING CONTACT SERVICE COMPLAINTS

Table 42.E.9
Fair Housing Complaints by Basis
 42. City of Barberton
 2004–2012 FHCS Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color			3	1						4
Disability		1	1	1	3	2		2	1	11
Familial Status			1		1		6			8
Harassment					1					1
National Origin			1				1			2
Race			3	1				2		6
Sex		1			3					4
Other					1					1
Total Bases	0	2	9	3	9	2	7	4	1	37
Total Complaints		1	4	2	7	2	7	4	2	29

Table 42.E.10
Fair Housing Complaints by Closure Status
 42. City of Barberton
 2004–2012 FHCS Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Closed				1	1			1		3
Elected not to pursue						1	2	1	1	5
Independently resolved						1	1			2
Inquiry			1		4					5
Lack of jurisdiction					1					1
No contact								1		1
No probable cause				1						1
Pending			1							1
Probable cause			1				2			3
Referred for other assistance									1	1
Settled			1				2	1		4
Settled through OCRC					1					1
Missing		1								1
Total Complaints	0	1	4	2	7	2	7	4	2	29

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 42.F.1
Primary Role of Respondent
 42. City of Barberton
 2012–2013 Fair Housing Survey for Housing
 Stakeholders Data

Primary Role	Total
Local Government	1
Total	1

FEDERAL, STATE, AND LOCAL LAWS

Table 42.F.2
**Familiarity with Fair
 Housing Laws**

42. City of Barberton
 2012–2013 Fair Housing Survey
 for Housing Stakeholders Data

Familiarity	Total
Not Familiar	0
Somewhat Familiar	0
Very Familiar	1
Missing	0
Total	1

Table 42.F.3
Perceptions About Fair Housing Laws

42. City of Barberton
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
Are fair housing laws difficult to understand or follow?		1			1
Do you think fair housing laws should be changed?		1			1
Do you think fair housing laws are adequately enforced?	1				1

Table 42.F.4
Fair Housing Activities

42. City of Barberton
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	
Have you participated in fair housing training?	1				1	
Are you aware of any fair housing testing?	1				1	
Testing and education	Too Little	Right Amount	Too Much	Don't Know	Missing	Total
Is there sufficient outreach and education activity?		1				1
Is there sufficient testing?		1				1

Table 42.F.5

Protected Classes

42. City of Barberton
2012–2013 Fair Housing Survey
for Housing Stakeholders Data

Protected Class	Total
Family Status	1
Gender	1
Total	2

Table 42.F.6

Fair Housing Violation Referrals

42. City of Barberton
2012–2013 Fair Housing Survey for Housing
Stakeholders Data

Referral	Total
Fair Housing Advocates Association	1
Total	1

LOCAL FAIR HOUSING

Table 42.F.7

Local Fair Housing

42. City of Barberton
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
Are there any specific geographic areas that have fair housing problems?		1			1
Are there any specific groups in that face housing discrimination?	1				1

FAIR HOUSING IN THE PRIVATE SECTOR

Table 42.F.8

Barriers to Fair Housing in the Private Sector

42. City of Barberton

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
The real estate industry?			1		1
The mortgage and home lending industry?			1		1
The housing construction or accessible housing design fields?			1		1
The home insurance industry?			1		1
The home appraisal industry?			1		1
Any other housing services?			1		1

FAIR HOUSING IN THE PUBLIC SECTOR

Table 42.F.9

Barriers to Fair Housing in the Public Sector

42. City of Barberton

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
Zoning laws?	1				1
Occupancy standards or health and safety codes?			1		1
Property tax policies?			1		1
Permitting process?			1		1
Housing construction standards?			1		1
Neighborhood or community development policies?			1		1
Limited access to government services, such as employment services?		1			1
Public administrative actions or regulations?	1				1

NARRATIVE COMMENTS

Federal, State, and Local Laws

Table 42.F.10

How did you become aware of fair housing laws?

42. City of Barberton

2013 Fair Housing Survey Data

Comments:
From Vince Curry (FHAA) Akron, Ohio about 12 years ago.

Fair Housing in the Public Sector

Table 42.F.11

Are you aware of any questionable practices or barriers to fair housing choice in any other public administrative actions or regulations?

42. City of Barberton

2013 Fair Housing Survey Data

Comments:
Barberton limits where group homes can go. Not a permitted use in a residential district.

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 42.G.1
Housing Development
 42. City of Barberton
 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?	Yes
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?	Don't know
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?	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 Barberton. 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 Barberton.

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 Barberton.*

Results of the Fair Housing Surveys indicate that Barberton may not have sufficient policies or practices that adequately address the duty to affirmatively further fair housing.

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 City of Barberton. 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 City of Barberton 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 in Barberton 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 in Barberton. 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 42.H.1
Impediments Matrix
 42. City of Barberton
 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	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					X				All	M
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							X		Disabled persons, families	M
6	Lack of inclusionary policies		X					X		X		All	H

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.

43. CITY OF CUYAHOGA FALLS

A. CENSUS BUREAU DATA

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

Table 43.A.1

Population by Age

43. City of Cuyahoga Falls
2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Under 5	3,221	6.5%	2,873	5.8%	-10.8%
5 to 19	8,830	17.9%	8,556	17.2%	-3.1%
20 to 24	2,928	5.9%	3,148	6.3%	7.5%
25 to 34	7,871	15.9%	7,488	15.1%	-4.9%
35 to 54	14,432	29.2%	13,717	27.6%	-5.0%
55 to 64	4,129	8.4%	6,294	12.7%	52.4%
65 or Older	7,963	16.1%	7,576	15.3%	-4.9%
Total	49,374	100.0%	49,652	100.0%	.6%

Table 43.A.2

Elderly Population by Age

43. City of Cuyahoga Falls
2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
65 to 66	716	9.0%	767	10.1%	7.1%
67 to 69	1,094	13.7%	1,189	15.7%	8.7%
70 to 74	2,204	27.7%	1,568	20.7%	-28.9%
75 to 79	1,947	24.5%	1,381	18.2%	-29.1%
80 to 84	1,185	14.9%	1,385	18.3%	16.9%
85 or Older	817	10.3%	1,286	17.0%	57.4%
Total	7,963	100.0%	7,576	100.0%	-4.9%

Table 43.A.3

Population by Race and Ethnicity

43. City of Cuyahoga Falls
2000 & 2010 Census SF1 Data

Race	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
White	47,300	95.8%	46,398	93.4%	-1.9%
Black	923	1.9%	1,642	3.3%	77.9%
American Indian	99	.2%	84	.2%	-15.2%
Asian	520	1.1%	573	1.2%	10.2%
Native Hawaiian/ Pacific Islander	6	.0%	6	.0%	.0%
Other	75	.2%	159	.3%	112.0%
Two or More Races	451	.9%	790	1.6%	75.2%
Total	49,374	100.0%	49,652	100.0%	.6%
Non-Hispanic	49,065	99.4%	48,980	98.6%	-.2%
Hispanic	309	.6%	672	1.4%	117.5%

Table 43.A.4**Disability by Age**43. City of Cuyahoga Falls
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	188	4.5%	177	4.6%	365	4.5%
18 to 34	335	5.9%	362	6.5%	697	6.2%
35 to 64	1,078	11.2%	1,386	13.2%	2,464	12.3%
65 to 74	540	32.5%	431	26.1%	971	29.3%
75 or Older	768	51.9%	1,298	54.5%	2,066	53.5%
Total	2,909	12.1%	3,654	14.4%	6,563	13.3%

Table 43.A.5**Employment Status by Disability and Type: Age 18 to 64**43. City of Cuyahoga Falls
2010 Three-Year ACS Data

Disability Status	Population
Employed:	23,460
With a disability:	1,181
With a hearing difficulty	300
With a vision difficulty	206
With a cognitive difficulty	514
With an ambulatory difficulty	453
With a self-care difficulty	171
With an independent living difficulty	440
No disability	22,279
Unemployed:	1,930
With a disability:	359
With a hearing difficulty	93
With a vision difficulty	36
With a cognitive difficulty	191
With an ambulatory difficulty	184
With a self-care difficulty	103
With an independent living difficulty	127
No disability	1,571
Not in labor force:	5,954
With a disability:	1,621
With a hearing difficulty	247
With a vision difficulty	260
With a cognitive difficulty	712
With an ambulatory difficulty	950
With a self-care difficulty	509
With an independent living difficulty	757
No disability	4,333
Total	31,344

Table 43.A.6**Households by Income**

43. City of Cuyahoga Falls

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	3,078	14.2%	2,818	12.8%
\$15,000 to \$19,999	1,203	5.5%	929	4.2%
\$20,000 to \$24,999	1,379	6.4%	1,196	5.4%
\$25,000 to \$34,999	2,928	13.5%	2,899	13.1%
\$35,000 to \$49,999	4,278	19.7%	4,097	18.6%
\$50,000 to \$74,999	5,077	23.4%	4,693	21.3%
\$75,000 to \$99,999	2,215	10.2%	2,966	13.4%
\$100,000 or More	1,548	7.1%	2,472	11.2%
Total	21,706	100.0%	22,070	100.0%

Table 43.A.7**Poverty by Age**

43. City of Cuyahoga Falls

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	420	14.0%	466	9.3%
6 to 17	492	16.4%	797	15.9%
18 to 64	1,749	58.5%	3,177	63.3%
65 or Older	330	11.0%	581	11.6%
Total	2,991	100.0%	5,021	100.0%
Poverty Rate	6.1%	.	10.2%	.

Table 43.A.8**Households by Year Home Built**

43. City of Cuyahoga Falls

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	4,061	18.7%	4,212	19.1%
1940 to 1949	2,888	13.3%	2,581	11.7%
1950 to 1959	5,414	25.0%	5,788	26.2%
1960 to 1969	2,851	13.2%	2,640	12.0%
1970 to 1979	2,415	11.1%	2,268	10.3%
1980 to 1989	1,645	7.6%	1,166	5.3%
1990 to 1999	2,394	11.0%	2,267	10.3%
2000 to 2004	.	.	850	3.9%
2005 or Later	.	.	298	1.4%
Total	21,668	100.0%	22,070	100.0%

Table 43.A.9**Housing Units by Type**

43. City of Cuyahoga Falls

2000 Census SF3 & 2010 Five-Year ACS Data

Unit Type	2000 Census		2010 Five-Year ACS	
	Units	% of Total	Units	% of Total
Single-Family	15,657	68.8%	16,824	72.2%
Duplex	1,193	5.2%	1,027	4.4%
Tri- or Four-Plex	947	4.2%	655	2.8%
Apartment	4,747	20.9%	4,646	20.0%
Mobile Home	207	.9%	135	.6%
Boat, RV, Van, Etc.	0	.0%	0	.0%
Total	22,751	100.0%	23,287	100.0%

Table 43.A.10**Housing Units by Tenure**

43. City of Cuyahoga Falls

2000 & 2010 Census SF1 Data

Tenure	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
Occupied Housing Units	21,655	95.3%	22,250	93.3%	2.7%
Owner-Occupied	14,234	65.7%	14,159	63.6%	-.5%
Renter-Occupied	7,421	34.3%	8,091	36.4%	9.0%
Vacant Housing Units	1,072	4.7%	1,609	6.7%	50.1%
Total Housing Units	22,727	100.0%	23,859	100.0%	5.0%

Table 43.A.11**Disposition of Vacant Housing Units**

43. City of Cuyahoga Falls

2000 & 2010 Census SF1 Data

Disposition	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
For Rent	529	49.3%	740	46.0%	39.9%
For Sale	168	15.7%	250	15.5%	48.8%
Rented or Sold, Not Occupied	123	11.5%	109	6.8%	-11.4%
For Seasonal, Recreational, or Occasional Use	67	6.3%	66	4.1%	-1.5%
For Migrant Workers	0	0.0%	0	.0%	%
Other Vacant	185	17.3%	444	27.6%	140.0%
Total	1,072	100.0%	1,609	100.0%	50.1%

Table 43.A.12**Households by Household Size**

43. City of Cuyahoga Falls

2000 & 2010 Census SF1 Data

Size	2000 Census		2010 Census		% Change 00-10
	Households	% of Total	Households	% of Total	
One Person	7,062	32.6%	7,925	35.6%	12.2%
Two Persons	7,553	34.9%	7,476	33.6%	-1.0%
Three Persons	3,202	14.8%	3,115	14.0%	-2.7%
Four Persons	2,494	11.5%	2,360	10.6%	-5.4%
Five Persons	998	4.6%	965	4.3%	-3.3%
Six Persons	247	1.1%	285	1.3%	15.4%
Seven Persons or More	99	.5%	124	.6%	25.3%
Total	21,655	100.0%	22,250	100.0%	2.7%

Table 43.A.13
Household Type by Tenure
 43. City of Cuyahoga Falls
 2000 & 2010 Census SF1 Data

Household Type	2000 Census		2010 Census		% Change 00–10
	Households	% of Total	Households	% of Total	
Family Households	13,307	61.5%	12,693	57.0%	-4.6%
Married-Couple Family	10,467	78.7%	9,312	73.4%	-11.0%
Owner-Occupied	8,689	83.0%	7,803	83.8%	-10.2%
Renter-Occupied	1,778	17.0%	1,509	16.2%	-15.1%
Other Family	2,840	21.3%	3,381	26.6%	19.0%
Male Householder, No Spouse	653	23.0%	834	24.7%	27.7%
Owner-Occupied	385	59.0%	476	57.1%	23.6%
Renter-Occupied	268	41.0%	358	42.9%	33.6%
Female Householder, No Spouse	2,187	77.0%	2,547	75.3%	16.5%
Owner-Occupied	1,222	55.9%	1,245	48.9%	1.9%
Renter-Occupied	965	44.1%	1,302	51.1%	34.9%
Non-Family Households	8,348	38.5%	9,557	43.0%	14.5%
Owner-Occupied	3,938	47.2%	4,635	48.5%	17.7%
Renter-Occupied	4,410	52.8%	4,922	51.5%	11.6%
Total	21,655	100.0%	22,250	100.0%	2.7%

Table 43.A.14
Group Quarters Population
 43. City of Cuyahoga Falls
 2000 & 2010 Census SF1 Data

Group Quarters Type	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Institutionalized					
Correctional Institutions	0	.0%	0	.0%	%
Juvenile Facilities	.	.	0	.0%	.
Nursing Homes	304	96.2%	345	100.0%	13.5%
Other Institutions	12	3.8%	0	.0%	-100.0%
Total	316	100.0%	345	100.0%	9.2%
Noninstitutionalized					
College Dormitories	0	.0%	0	.0%	%
Military Quarters	0	.0%	0	.0%	%
Other Noninstitutional	83	100.0%	185	100.0%	122.9%
Total	83	20.8%	185	34.9%	122.9%
Total Group Quarters Population	399	100.0%	530	100.0%	32.8%

Table 43.A.15
Overcrowding and Severe Overcrowding
 43. City of Cuyahoga Falls
 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	14,190	99.7%	40	.3%	9	.1%	14,239
2010 ACS	14,664	99.8%	27	.2%	0	.0%	14,691
Renter							
2000 Census	7,259	97.7%	117	1.6%	53	.7%	7,429
2010 ACS	7,307	99.0%	53	.7%	19	.3%	7,379
Total							
2000 Census	21,449	99.0%	157	.7%	62	.3%	21,668
2010 ACS	21,971	99.6%	80	.4%	19	.1%	22,070

Table 43.A.16
Households with Incomplete Plumbing Facilities
 43. City of Cuyahoga Falls
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Plumbing Facilities	21,626	22,040
Lacking Complete Plumbing Facilities	42	30
Total Households	21,668	22,070
Percent Lacking	.2%	.1%

Table 43.A.17
Households with Incomplete Kitchen Facilities
 43. City of Cuyahoga Falls
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Kitchen Facilities	21,624	22,050
Lacking Complete Kitchen Facilities	44	20
Total Households	21,668	22,070
Percent Lacking	.2%	.1%

Table 43.A.18
Cost Burden and Severe Cost Burden by Tenure
 43. City of Cuyahoga Falls
 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	7,006	76.0%	1,574	17.1%	621	6.7%	15	.2%	9,216
2010 ACS	7,303	70.2%	2,315	22.2%	748	7.2%	39	.4%	10,405
Owner Without a Mortgage									
2000 Census	3,776	91.8%	184	4.5%	83	2.0%	69	1.7%	4,112
2010 ACS	3,461	80.8%	488	11.4%	268	6.3%	69	1.6%	4,286
Renter									
2000 Census	4,864	65.6%	1,262	17.0%	1,050	14.2%	233	3.1%	7,409
2010 ACS	3,918	53.1%	1,679	22.8%	1,309	17.7%	473	6.4%	7,379
Total									
2000 Census	15,646	75.4%	3,020	14.6%	1,754	8.5%	317	1.5%	20,737
2010 ACS	14,682	66.5%	4,482	20.3%	2,325	10.5%	581	2.6%	22,070

Table 43.A.19
Median Housing Costs
 43. City of Cuyahoga Falls
 2000 Census SF3 & 2010 Five-Year ACS Data

Housing Cost	2000 Census	2010 ACS
Median Contract Rent	\$527	\$608
Median Home Value	\$106,100	\$125,600

B. BLS DATA

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

Table 43.B.1
Labor Force Statistics
 43. City of Cuyahoga Falls
 1990–2011 BLS Data

Year	Labor Force	Employment	Unemployment	Unemployment Rate	Statewide Unemployment Rate
1990	26,231	25,305	926	3.5%	5.7%
1991	26,494	25,389	1,105	4.2%	6.6%
1992	26,928	25,638	1,290	4.8%	7.4%
1993	27,160	26,003	1,157	4.3%	6.7%
1994	27,820	26,852	968	3.5%	5.6%
1995	28,110	27,218	892	3.2%	4.9%
1996	28,454	27,518	936	3.3%	5.0%
1997	28,580	27,688	892	3.1%	4.6%
1998	28,421	27,610	811	2.9%	4.3%
1999	28,651	27,805	846	3.0%	4.3%
2000	26,907	26,163	744	2.8%	4.0%
2001	26,869	26,047	822	3.1%	4.4%
2002	26,799	25,724	1,075	4.0%	5.7%
2003	27,602	26,122	1,480	5.4%	6.2%
2004	27,977	26,445	1,532	5.5%	6.1%
2005	28,340	26,876	1,464	5.2%	5.9%
2006	28,688	27,327	1,361	4.7%	5.4%
2007	29,258	27,833	1,425	4.9%	5.6%
2008	29,540	27,877	1,663	5.6%	6.5%
2009	29,161	26,518	2,643	9.1%	10.1%
2010	27,896	25,260	2,636	9.4%	10.0%
2011	27,420	25,230	2,190	8.0%	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 43.C.1
Purpose of Loan by Year
43. City of Cuyahoga Falls
2004–2011 HMDA Data

Purpose	2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	1,680	1,798	1,683	1,288	981	1,068	814	747	10,059
Home Improvement	300	374	329	293	243	160	74	90	1,863
Refinancing	2,941	2,818	2,437	1,765	1,135	1,718	1,580	1,330	15,724
Total	4,921	4,990	4,449	3,346	2,359	2,946	2,468	2,167	27,646

Table 43.C.2
Occupancy Status for Home Purchase Loan Applications
43. City of Cuyahoga Falls
2004–2011 HMDA Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	Total
Owner-Occupied	1,513	1,626	1,521	1,181	914	1,032	772	698	9,257
Not Owner-Occupied	151	164	155	101	64	36	42	47	760
Not Applicable	16	8	7	6	3	0	0	2	42
Total	1,680	1,798	1,683	1,288	981	1,068	814	747	10,059

Table 43.C.3
Owner-Occupied Home Purchase Loan Applications by Loan Type
43. City of Cuyahoga Falls
2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Conventional	1,315	1,407	1,320	991	411	295	214	257	6,210
FHA - Insured	173	185	163	169	466	704	517	400	2,777
VA - Guaranteed	25	34	38	21	37	33	41	41	270
Rural Housing Service or Farm Service Agency	0	0	0	0	0	0	0	0	0
Total	1,513	1,626	1,521	1,181	914	1,032	772	698	9,257

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 43.C.4
Loan Applications by Action Taken
 43. City of Cuyahoga Falls
 2004–2011 HMDA Data

Action	2004	2005	2006	2007	2008	2009	2010	2011	Total
Loan Originated	899	933	845	665	501	518	392	345	5,098
Application Approved but not Accepted	85	76	80	50	31	20	13	19	374
Application Denied	134	122	143	102	60	45	35	44	685
Application Withdrawn by Applicant	91	115	69	44	43	40	36	40	478
File Closed for Incompleteness	27	32	20	17	12	7	3	4	122
Loan Purchased by the Institution	277	345	364	303	267	402	293	246	2,497
Preapproval Request Denied	0	2	0	0	0	0	0	0	2
Preapproval Approved but not Accepted	0	1	0	0	0	0	0	0	1
Total	1,513	1,626	1,521	1,181	914	1,032	772	698	9,257
Denial Rate	13.0%	11.6%	14.5%	13.3%	10.7%	8.0%	8.2%	11.3%	11.8%

Table 43.C.5
Denial Rates by Gender of Applicant
 43. City of Cuyahoga Falls
 2004–2011 HMDA Data

Year	Male	Female	Not Available	Not Applicable	Average
2004	12.1%	13.6%	28.0%	%	13.0%
2005	10.8%	12.2%	24.1%	%	11.6%
2006	12.6%	16.2%	40.9%	%	14.5%
2007	12.6%	13.1%	33.3%	%	13.3%
2008	11.4%	8.4%	28.6%	%	10.7%
2009	8.5%	7.1%	8.3%	%	8.0%
2010	7.7%	7.5%	37.5%	%	8.2%
2011	13.3%	6.9%	21.1%	%	11.3%
Average	11.3%	11.6%	28.0%	%	11.8%

Table 43.C.6
Loan Applications by Selected Action Taken by Gender of Applicant
 43. City of Cuyahoga Falls
 2004–2011 HMDA Data

Gender		2004	2005	2006	2007	2008	2009	2010	2011	Total
Male	Originated	601	630	543	418	333	311	251	196	3,283
	Denied	83	76	78	60	43	29	21	30	420
	Denial Rate	12.1%	10.8%	12.6%	12.6%	11.4%	8.5%	7.7%	13.3%	11.3%
Female	Originated	280	281	289	233	163	196	136	134	1,712
	Denied	44	39	56	35	15	15	11	10	225
	Denial Rate	13.6%	12.2%	16.2%	13.1%	8.4%	7.1%	7.5%	6.9%	11.6%
Not Available	Originated	18	22	13	14	5	11	5	15	103
	Denied	7	7	9	7	2	1	3	4	40
	Denial Rate	28.0%	24.1%	40.9%	33.3%	28.6%	8.3%	37.5%	21.1%	28.0%
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	899	933	845	665	501	518	392	345	5,098
	Denied	134	122	143	102	60	45	35	44	685
	Denial Rate	13.0%	11.6%	14.5%	13.3%	10.7%	8.0%	8.2%	11.3%	11.8%

Table 43.C.7
Denial Rates by Race/Ethnicity of Applicant
 43. City of Cuyahoga Falls
 2004–2011 HMDA Data

Race/Ethnicity	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	.0%	%	.0%	%	.0%	.0%	%	%	.0%
Asian	.0%	12.5%	11.1%	9.1%	.0%	55.6%	20.0%	.0%	16.4%
Black	53.8%	33.3%	46.2%	21.1%	10.5%	25.0%	25.0%	.0%	28.6%
White	12.5%	10.7%	12.8%	11.8%	10.4%	6.9%	7.5%	11.2%	10.9%
Not Available	14.6%	20.0%	40.0%	31.4%	20.0%	9.5%	17.6%	16.0%	22.9%
Not Applicable	%	%	%	%	%	0%	0%	%	%
Average	13.0%	11.6%	14.5%	13.3%	10.7%	8.0%	8.2%	11.3%	11.8%
Non-Hispanic	13.3%	11.1%	13.4%	11.9%	9.8%	8.2%	7.6%	10.9%	11.3%
Hispanic	20.0%	.0%	.0%	18.2%	.0%	.0%	25.0%	20.0%	10.2%

Table 43.C.8
Loan Applications by Selected Action Taken by Race/Ethnicity of Applicant
 43. City of Cuyahoga Falls
 2004–2011 HMDA Data

Race		2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Originated	2	0	2	0	1	1	0	0	6
	Denied	0	0	0	0	0	0	0	0	0
	Denial Rate	.0%	%	.0%	%	.0%	%	%	%	.0%
Asian	Originated	7	7	8	10	1	4	4	5	46
	Denied	0	1	1	1	0	5	1	0	9
	Denial Rate	.0%	12.5%	11.1%	9.1%	.0%	55.6%	20.0%	.0%	16.4%
Black	Originated	6	8	7	15	17	6	3	3	65
	Denied	7	4	6	4	2	2	1	0	26
	Denial Rate	53.8%	33.3%	46.2%	21.1%	10.5%	25.0%	25.0%	.0%	28.6%
White	Originated	843	866	801	605	466	488	371	316	4,756
	Denied	120	104	118	81	54	36	30	40	583
	Denial Rate	12.5%	10.7%	12.8%	11.8%	10.4%	6.9%	7.5%	11.2%	10.9%
Not Available	Originated	41	52	27	35	16	19	14	21	225
	Denied	7	13	18	16	4	2	3	4	67
	Denial Rate	14.6%	20.0%	40.0%	31.4%	20.0%	9.5%	17.6%	16.0%	22.9%
Not Applicable	Originated	0	0	0	0	0	0	0	0	0
	Denied	0	0	0	0	0	0	0	0	0
	Denial Rate	14.6%	20.0%	40.0%	31.4%	20.0%	9.5%	17.6%	16.0%	%
Total	Originated	899	933	845	665	501	518	392	345	5,098
	Denied	134	122	143	102	60	45	35	44	685
	Denial Rate	13.0%	11.6%	14.5%	13.3%	10.7%	8.0%	8.2%	11.3%	11.8%
Non-Hispanic	Originated	785	865	805	624	477	491	376	320	4,743
	Denied	120	108	125	84	52	44	31	39	603
	Denial Rate	13.3%	11.1%	13.4%	11.9%	9.8%	8.2%	7.6%	10.9%	11.3%
Hispanic	Originated	8	9	10	9	4	6	3	4	53
	Denied	2	0	0	2	0	0	1	1	6
	Denial Rate	20.0%	.0%	.0%	18.2%	.0%	.0%	25.0%	20.0%	10.2%

Table 43.C.9
Loan Applications by Reason for Denial
 43. City of Cuyahoga Falls
 2004–2011 HMDA Data

Denial Reason	2004	2005	2006	2007	2008	2009	2010	2011	Total
Debt-to-Income Ratio	18	17	22	26	13	8	9	9	122
Employment History	8	0	1	5	0	0	1	0	15
Credit History	39	34	32	15	13	8	6	9	156
Collateral	2	7	7	11	10	13	6	9	65
Insufficient Cash	6	5	2	1	2	1	1	1	19
Unverifiable Information	3	7	9	6	2	3	0	0	30
Credit Application Incomplete	6	10	16	8	6	5	2	5	58
Mortgage Insurance Denied	1	0	1	0	0	0	1	0	3
Other	27	23	23	12	5	4	5	6	105
Missing	24	19	30	18	9	3	4	5	112
Total	134	122	143	102	60	45	35	44	685

Table 43.C.10
Denial Rates by Income of Applicant
 43. City of Cuyahoga Falls
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	40.0%	25.0%	33.3%	100.0%	50.0%	100.0%	.0%	33.3%	44.4%
\$15,001–\$30,000	21.2%	14.8%	17.1%	17.2%	11.5%	10.3%	9.8%	11.8%	15.1%
\$30,001–\$45,000	14.0%	14.6%	19.4%	12.5%	12.8%	6.1%	5.8%	7.7%	12.8%
\$45,001–\$60,000	11.7%	9.4%	15.6%	12.9%	6.9%	6.4%	2.4%	13.0%	10.5%
\$60,001–\$75,000	11.9%	7.7%	7.0%	14.4%	7.9%	8.3%	4.2%	7.5%	9.0%
Above \$75,000	7.3%	8.2%	10.9%	9.2%	12.0%	8.6%	16.2%	15.1%	10.2%
Data Missing	7.7%	14.7%	3.1%	40.0%	50.0%	25.0%	55.6%	33.3%	14.8%
Total	13.0%	11.6%	14.5%	13.3%	10.7%	8.0%	8.2%	11.3%	11.8%

Table 43.C.11
Denial Rates of Loans by Race/Ethnicity and Income of Applicant
 43. City of Cuyahoga Falls
 2004–2011 HMDA Data

Race	<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	Above \$75K	Data Missing	Average
American Indian	%	.0%	.0%	.0%	%	%	%	.0%
Asian	%	22.2%	18.8%	9.1%	16.7%	15.4%	%	16.4%
Black	%	22.2%	40.0%	19.2%	15.4%	37.5%	50.0%	28.6%
White	46.2%	14.4%	11.8%	9.7%	8.5%	9.3%	9.2%	10.9%
Not Available	.0%	25.7%	28.8%	22.7%	13.3%	16.1%	47.1%	22.9%
Not Applicable	%	%	%	%	%	%	%	%
Average	44.4%	15.1%	12.8%	10.5%	9.0%	10.2%	14.8%	11.8%
Non-Hispanic Ethnicity	46.2%	14.8%	12.1%	10.0%	8.6%	9.6%	11.8%	11.3%
Hispanic (Ethnicity)	%	14.3%	15.0%	7.1%	16.7%	.0%	.0%	10.2%

Table 43.C.12
Loan Applications by Reason for Denial by Race/Ethnicity of Applicant
 43. City of Cuyahoga Falls
 2004–2011 HMDA Data

Denial Reason	American Indian	Asian	Black	White	Not Available	Not Applicable	Total	Hispanic (Ethnicity)
Debt-to-Income Ratio	0	3	3	109	7	0	122	1
Employment History	0	0	3	11	1	0	15	0
Credit History	0	0	4	137	15	0	156	0
Collateral	0	2	1	56	6	0	65	3
Insufficient Cash	0	1	2	16	0	0	19	0
Unverifiable Information	0	0	5	24	1	0	30	0
Credit Application Incomplete	0	1	1	51	5	0	58	0
Mortgage Insurance Denied	0	0	0	3	0	0	3	0
Other	0	0	3	92	10	0	105	0
Missing	0	2	4	84	22	0	112	2
Total	0	9	26	583	67	0	685	6
% Missing	%	22.2%	15.4%	14.4%	32.8%	%	16.4%	33.3%

Table 43.C.13
Loan Applications by Income of Applicant: Originated and Denied
 43. City of Cuyahoga Falls
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Loan Originated	3	3	2	0	1	0	2	4	15
	Application Denied	2	1	1	3	1	2	0	2	12
	Denial Rate	40.0%	25.0%	33.3%	100.0%	50.0%	100.0%	.0%	33.3%	44.4%
\$15,001–\$30,000	Loan Originated	104	127	87	82	54	78	55	60	647
	Application Denied	28	22	18	17	7	9	6	8	115
	Denial Rate	21.2%	14.8%	17.1%	17.2%	11.5%	10.3%	9.8%	11.8%	15.1%
\$30,001–\$45,000	Loan Originated	289	268	250	189	150	169	146	108	1,569
	Application Denied	47	46	60	27	22	11	9	9	231
	Denial Rate	14.0%	14.6%	19.4%	12.5%	12.8%	6.1%	5.8%	7.7%	12.8%
\$45,001–\$60,000	Loan Originated	211	230	168	169	122	117	82	60	1,159
	Application Denied	28	24	31	25	9	8	2	9	136
	Denial Rate	11.7%	9.4%	15.6%	12.9%	6.9%	6.4%	2.4%	13.0%	10.5%
\$60,001–\$75,000	Loan Originated	104	131	119	83	70	66	46	49	668
	Application Denied	14	11	9	14	6	6	2	4	66
	Denial Rate	11.9%	7.7%	7.0%	14.4%	7.9%	8.3%	4.2%	7.5%	9.0%
Above \$75,000	Loan Originated	152	145	188	139	103	85	57	62	931
	Application Denied	12	13	23	14	14	8	11	11	106
	Denial Rate	7.3%	8.2%	10.9%	9.2%	12.0%	8.6%	16.2%	15.1%	10.2%
Data Missing	Loan Originated	36	29	31	3	1	3	4	2	109
	Application Denied	3	5	1	2	1	1	5	1	19
	Denial Rate	7.7%	14.7%	3.1%	40.0%	50.0%	25.0%	55.6%	33.3%	14.8%
Total	Loan Originated	899	933	845	665	501	518	392	345	5,098
	Application Denied	134	122	143	102	60	45	35	44	685
	Denial Rate	13.0%	11.6%	14.5%	13.3%	10.7%	8.0%	8.2%	11.3%	11.8%

Table 43.C.14
Loan Applications by Income and Race/Ethnicity of Applicant: Originated and Denied
 43. City of Cuyahoga Falls
 2004–2011 HMDA Data

Race		<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	> \$75K	Data Missing	Total
American Indian	Loan Originated	0	3	1	2	0	0	0	6
	Application Denied	0	0	0	0	0	0	0	0
	Denial Rate	%	.0%	.0%	.0%	%	%	%	.0%
Asian	Loan Originated	0	7	13	10	5	11	0	46
	Application Denied	0	2	3	1	1	2	0	9
	Denial Rate	%	22.2%	18.8%	9.1%	16.7%	15.4%	%	16.4%
Black	Loan Originated	0	7	15	21	11	10	1	65
	Application Denied	0	2	10	5	2	6	1	26
	Denial Rate	%	22.2%	40.0%	19.2%	15.4%	37.5%	50.0%	28.6%
White	Loan Originated	14	604	1,493	1,075	613	858	99	4,756
	Application Denied	12	102	199	115	57	88	10	583
	Denial Rate	46.2%	14.4%	11.8%	9.7%	8.5%	9.3%	9.2%	10.9%
Not Available	Loan Originated	1	26	47	51	39	52	9	225
	Application Denied	0	9	19	15	6	10	8	67
	Denial Rate	.0%	25.7%	28.8%	22.7%	13.3%	16.1%	47.1%	22.9%
Not Applicable	Loan Originated	0	0	0	0	0	0	0	0
	Application Denied	0	0	0	0	0	0	0	0
	Denial Rate	%	%	%	%	%	%	%	%
Total	Loan Originated	15	647	1,569	1,159	668	931	109	5,098
	Application Denied	12	115	231	136	66	106	19	685
	Denial Rate	44.4%	15.1%	12.8%	10.5%	9.0%	10.2%	14.8%	11.8%
Non-Hispanic Ethnicity	Loan Originated	14	598	1,488	1,076	615	862	90	4,743
	Application Denied	12	104	205	120	58	92	12	603
	Denial Rate	46.2%	14.8%	12.1%	10.0%	8.6%	9.6%	11.8%	11.3%
Hispanic (Ethnicity)	Loan Originated	0	6	17	13	5	9	3	53
	Application Denied	0	1	3	1	1	0	0	6
	Denial Rate	%	14.3%	15.0%	7.1%	16.7%	.0%	.0%	10.2%

PREDATORY LENDING

Table 43.C.15
Originated Owner-Occupied Loans by HAL Status
 43. City of Cuyahoga Falls
 2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Other	799	744	715	600	448	472	392	345	4,515
HAL	100	189	130	65	53	46	0	0	583
Total	899	933	845	665	501	518	392	345	5,098
Percent HAL	11.1%	20.3%	15.4%	9.8%	10.6%	8.9%	.0%	.0%	11.4%

Table 43.C.16
Loans by Loan Purpose by HAL Status
 43. City of Cuyahoga Falls
 2004–2011 HMDA Data

Loan Purpose		2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	Other	799	744	715	600	448	472	392	345	4,515
	HAL	100	189	130	65	53	46	0	0	583
	Percent HAL	11.1%	20.3%	15.4%	9.8%	10.6%	8.9%	.0%	.0%	11.4%
Home Improvement	Other	89	83	101	81	76	34	17	22	503
	HAL	21	39	30	24	15	12	1	3	145
	Percent HAL	19.1%	32.0%	22.9%	22.9%	16.5%	26.1%	5.6%	12.0%	22.4%
Refinancing	Other	938	653	538	476	327	700	755	620	5,007
	HAL	188	284	244	121	61	40	4	4	946
	Percent HAL	16.7%	30.3%	31.2%	20.3%	15.7%	5.4%	.5%	.6%	15.9%
Total	Other	1,826	1,480	1,354	1,157	851	1,206	1,164	987	10,025
	HAL	309	512	404	210	53	46	0	0	1,674
	Percent HAL	14.5%	25.7%	23.0%	15.4%	13.2%	7.5%	.4%	.7%	14.3%

Table 43.C.17
HALs Originated by Race of Borrower
 43. City of Cuyahoga Falls
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	1	0	0	0	0	0	0	0	1
Asian	1	1	2	2	0	0	0	0	6
Black	4	3	3	3	1	1	0	0	15
White	85	162	112	54	50	43	0	0	506
Not Available	9	23	13	6	2	2	0	0	55
Not Applicable	0	0	0	0	0	0	0	0	0
Total	100	189	130	65	53	46	0	0	583
Hispanic (Ethnicity)	2	5	2	0	1	0	0	0	10

Table 43.C.18
Rate of HALs Originated by Race/Ethnicity of Borrower
 43. City of Cuyahoga Falls
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	50.0%	%	.0%	%	.0%	.0%	%	%	16.7%
Asian	14.3%	14.3%	25.0%	20.0%	.0%	.0%	.0%	.0%	13.0%
Black	66.7%	37.5%	42.9%	20.0%	5.9%	16.7%	.0%	.0%	23.1%
White	10.1%	18.7%	14.0%	8.9%	10.7%	8.8%	.0%	.0%	10.6%
Not Available	22.0%	44.2%	48.1%	17.1%	12.5%	10.5%	.0%	.0%	24.4%
Not Applicable	%	%	%	%	%	%	%	%	%
Average	11.1%	20.3%	15.4%	9.8%	10.6%	8.9%	0.0%	0.0%	11.4%
Non-Hispanic Ethnicity	10.4%	17.9%	14.9%	9.6%	10.3%	9.0%	%	%	%
Hispanic (Ethnicity)	25.0%	55.6%	20.0%	.0%	25.0%	.0%	.0%	.0%	18.9%

Table 43.C.19
Loans by HAL Status by Race/Ethnicity of Borrower
 43. City of Cuyahoga Falls
 2004–2011 HMDA Data

Race	Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Other	1	0	2	0	1	1	0	0	5
	HAL	1	0	0	0	0	0	0	0	1
	Percent HAL	50.0%	%	.0%	%	.0%	.0%	%	%	16.7%
Asian	Other	6	6	6	8	1	4	4	5	40
	HAL	1	1	2	2	0	0	0	0	6
	Percent HAL	14.3%	14.3%	25.0%	20.0%	.0%	.0%	.0%	.0%	13.0%
Black	Other	2	5	4	12	16	5	3	3	50
	HAL	4	3	3	3	1	1	0	0	15
	Percent HAL	66.7%	37.5%	42.9%	20.0%	5.9%	16.7%	.0%	.0%	23.1%
White	Other	758	704	689	551	416	445	371	316	4,250
	HAL	85	162	112	54	50	43	0	0	506
	Percent HAL	10.1%	18.7%	14.0%	8.9%	10.7%	8.8%	0.0%	0.0%	10.6%
Not Available	Other	32	29	14	29	14	17	14	21	170
	HAL	9	23	13	6	2	2	0	0	55
	Percent HAL	22.0%	44.2%	48.1%	17.1%	12.5%	10.5%	.0%	.0%	24.4%
Not Applicable	Other	0	0	0	0	0	0	0	0	0
	HAL	0	0	0	0	0	0	0	0	0
	Percent HAL	%	%	%	%	%	%	%	%	.0%
Total	Other	799	744	715	600	448	472	392	345	4,515
	HAL	100	189	130	65	53	46	0	0	583
	Percent HAL	11.1%	20.3%	15.4%	9.8%	10.6%	8.9%	.0%	.0%	11.4%
Non-Hispanic Ethnicity	Other	703	710	685	564	428	447	376	320	4,233
	HAL	82	155	120	60	49	44			
	Percent HAL	10.4%	17.9%	14.9%	9.6%	10.3%	9.0%	%	%	%
Hispanic (Ethnicity)	Other	6	4	8	9	3	6	3	4	43
	HAL	2	5	2	0	1	0	0	0	10
	Percent HAL	25.0%	55.6%	20.0%	.0%	25.0%	.0%	.0%	.0%	18.9%

Table 43.C.20
Rates of HALs by Income of Borrower
 43. City of Cuyahoga Falls
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Average
\$15,000 or Below	.0%	.0%	.0%	%	.0%	%	.0%	.0%	.0%
\$15,001–\$30,000	11.5%	18.9%	12.6%	13.4%	16.7%	9.0%	.0%	.0%	11.4%
\$30,001–\$45,000	14.9%	24.3%	14.0%	8.5%	12.7%	10.1%	.0%	.0%	12.4%
\$45,001–\$60,000	9.5%	21.7%	22.6%	12.4%	12.3%	8.5%	.0%	.0%	13.3%
\$60,001–\$75,000	10.6%	16.8%	14.3%	6.0%	5.7%	10.6%	.0%	.0%	9.9%
Above \$75,000	8.6%	15.2%	10.6%	7.9%	5.8%	5.9%	0.0%	.0%	8.3%
Data Missing	2.8%	20.7%	29.0%	33.3%	.0%	.0%	.0%	.0%	15.6%
Average	11.1%	20.3%	15.4%	9.8%	10.6%	8.9%	.0%	.0%	11.4%

Table 43.C.21
Loans by HAL Status by Income of Borrower
 43. City of Cuyahoga Falls
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Other	3	3	2	0	1	0	2	4	15
	HAL	0	0	0	0	0	0	0	0	0
	Percent HAL	.0%	.0%	.0%	%	.0%	%	.0%	.0%	.0%
\$15,001–\$30,000	Other	92	103	76	71	45	71	55	60	573
	HAL	12	24	11	11	9	7	0	0	74
	Percent HAL	11.5%	18.9%	12.6%	13.4%	16.7%	9.0%	.0%	.0%	11.4%
\$30,001–\$45,000	Other	246	203	215	173	131	152	146	108	1,374
	HAL	43	65	35	16	19	17	0	0	195
	Percent HAL	14.9%	24.3%	14.0%	8.5%	12.7%	10.1%	.0%	.0%	12.4%
\$45,001 – \$60,000	Other	191	180	130	148	107	107	82	60	1,005
	HAL	20	50	38	21	15	10	0	0	154
	Percent HAL	9.5%	21.7%	22.6%	12.4%	12.3%	8.5%	.0%	.0%	13.3%
\$60,001–\$75,000	Other	93	109	102	78	66	59	46	49	602
	HAL	11	22	17	5	4	7	0	0	66
	Percent HAL	10.6%	16.8%	14.3%	6.0%	5.7%	10.6%	.0%	.0%	9.9%
Above \$75,000	Other	139	123	168	128	97	80	57	62	854
	HAL	13	22	20	11	6	5	0	0	77
	Percent HAL	8.6%	15.2%	10.6%	7.9%	5.8%	5.9%	.0%	.0%	8.3%
Data Missing	Other	35	23	22	2	1	3	4	2	92
	HAL	1	6	9	1	0	0	0	0	17
	Percent HAL	2.8%	20.7%	29.0%	33.3%	.0%	.0%	.0%	.0%	15.6%
Total	Other	799	744	715	600	448	472	392	345	4,515
	HAL	100	189	130	65	53	46	0	0	583
	Percent HAL	11.1%	20.3%	15.4%	9.8%	10.6%	8.9%	.0%	.0%	11.4%

D. CRA DATA

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

Table 43.D.1
Small Business Loans Originated: \$100,000 or Less by Tract MFI
 43. City of Cuyahoga Falls
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000			645			645
2001			700			700
2002			766			766
2003			914	58		972
2004			835	58		893
2005			882	61		943
2006			1,251	82		1,333
2007			1,339	84		1,423
2008			961	60		1,021
2009			418	18		436
2010			425	19		444
2011			485	23		508
Total	0	0	9,621	463	0	10,084
Loan Amount (\$1,000s)						
2000			7,637			7,637
2001			8,102			8,102
2002			8,573			8,573
2003			9,354	484		9,838
2004			8,146	887		9,033
2005			10,268	900		11,168
2006			13,190	1,065		14,255
2007			13,573	884		14,457
2008			8,868	480		9,348
2009			4,989	287		5,276
2010			5,528	291		5,819
2011			7,711	548		8,259
Total	0	0	105,939	5,826	0	111,765

Table 43.D.2
Small Business Loans Originated: \$100,001 to \$250,000 by Tract MFI
 43. City of Cuyahoga Falls
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000			19			19
2001			41			41
2002			25			25
2003			41	2		43
2004			37	3		40
2005			35	3		38
2006			50	1		51
2007			37	2		39
2008			22	1		23
2009			16	1		17
2010			17	2		19
2011			34	2		36
Total	0	0	374	17	0	391
Loan Amount (\$1,000s)						
2000			3,133			3,133
2001			6,966			6,966
2002			4,386			4,386
2003			7,099	370		7,469
2004			6,607	600		7,207
2005			6,373	559		6,932
2006			8,886	200		9,086
2007			6,650	375		7,025
2008			3,859	150		4,009
2009			2,852	192		3,044
2010			3,147	377		3,524
2011			5,885	286		6,171
Total	0	0	65,843	3,109	0	68,952

Table 43.D.3
Small Business Loans Originated: More than \$250,000 by Tract MFI
 43. City of Cuyahoga Falls
 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			22
2001			24			24
2002			31			31
2003			31	4		35
2004			40	0		40
2005			37	1		38
2006			35	3		38
2007			33	2		35
2008			19	0		19
2009			22	1		23
2010			41	0		41
2011			33	2		35
Total	0	0	368	13	0	381
Loan Amount (\$1,000s)						
2000			13,433			13,433
2001			13,835			13,835
2002			16,889			16,889
2003			17,336	1,461		18,797
2004			22,692	0		22,692
2005			20,165	270		20,435
2006			20,823	1,100		21,923
2007			15,937	800		16,737
2008			10,559	0		10,559
2009			11,436	500		11,936
2010			19,783	0		19,783
2011			18,557	1,170		19,727
Total	0	0	201,445	5,301	0	206,746

Table 43.D.4
Small Business Loans to Businesses with Gross Annual Revenues of Less Than \$1 Million by Tract MFI
 43. City of Cuyahoga Falls
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000			268			268
2001			341			341
2002			207			207
2003			274	20		294
2004			265	19		284
2005			387	26		413
2006			476	43		519
2007			522	27		549
2008			292	16		308
2009			159	3		162
2010			144	6		150
2011			226	11		237
Total	0	0	3,561	171	0	3,732
Loan Amount (\$1,000s)						
2000			8,704			8,704
2001			16,347			16,347
2002			13,045			13,045
2003			10,603	1,713		12,316
2004			9,698	294		9,992
2005			11,940	940		12,880
2006			14,066	664		14,730
2007			15,787	756		16,543
2008			10,352	285		10,637
2009			5,020	23		5,043
2010			8,299	407		8,706
2011			12,238	255		12,493
Total	0	0	136,099	5,337	0	141,436

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 43.E.1
Fair Housing Complaints by Basis
43. City of Cuyahoga Falls
2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color						1	1			2
Disability	4	4	6	6	8		4	3	1	36
Family Status			1	3	3	2	1	2		12
Race	1	1		5	1	3	4	4	2	21
Religion							1			1
Sex		1	2			2	1	2	1	9
Total Bases	5	6	9	14	12	8	12	11	4	81
Total Complaints	7	4	8	10	9	7	8	7	2	62

Table 43.E.2
Fair Housing Complaints by Issue
43. City of Cuyahoga Falls
2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Discriminatory refusal to rent			1	5				1		7
Discriminatory acts under Section 818 (coercion, etc.)			1			1		1	1	4
Discriminatory refusal to rent and negotiate for rental		1		2				1		4
Discrimination in services and facilities relating to rental	1			1						2
Discriminatory advertisement - rental						2				2
Discriminatory refusal to negotiate for rental							1	1		2
Discriminatory refusal to sell		1							1	2
Failure to provide accessible and usable public and common user areas	1		1							2
Failure to provide an accessible route into and thru the covered unit	1		1							2
Other discriminatory acts	2									2
Discrimination in terms, conditions or privileges relating to rental	2	1	1		1	2	6	3		16
Discriminatory terms, conditions, privileges, or services and facilities		1	3		6	3			1	14
Failure to make reasonable accommodation	2		2	1	3		2	1	1	12
Failure to provide an accessible building entrance			1							1
Failure to provide usable kitchens and bathrooms	1									1
False denial or representation of availability - rental							1			1
Otherwise deny or make housing available				1						1
Restriction of choices relative to a rental	1									1
Total Issues	11	4	11	10	10	8	10	8	4	76
Total Complaints	7	4	8	10	9	7	8	7	2	62

Table 43.E.3
Fair Housing Complaints by Closure Status
 43. City of Cuyahoga Falls
 2004–2012 HUD Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Administrative Closure Cause (FHAP)	1			5	1	2			1	9
Conciliated / Settled	3	4	5	3	4		4			23
No Cause	3		3	2	2	5	4	5		24
Open								2	1	3
Total Complaints	7	4	8	10	9	7	8	7	2	62

HUD Complaints Found With Cause

Table 43.E.4
Fair Housing Complaints Found With Cause by Basis
 43. City of Cuyahoga Falls
 2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability	3	4	3	2	5		3			20
Family Status			1	1	2		1			5
Race	1	1		2			1			5
Sex		1	1				1			3
Total Bases	4	6	5	5	7		6			33
Total Complaints	4	4	5	3	6		4			26

Table 43.E.5
Fair Housing Complaints Found With Cause by Issue
 43. City of Cuyahoga Falls
 2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Discriminatory terms, conditions, privileges, or services and facilities				1	2		4			7
Failure to make reasonable accommodation			2		1		2		1	6
Discrimination in terms, conditions or privileges relating to rental				1					3	4
Discriminatory refusal to rent						2				2
Failure to provide accessible and usable public and common user areas	1				1					2
Failure to provide an accessible route into and thru the covered unit	1				1					2
Discriminatory refusal to sell				1						1
Discriminatory refusal to rent and 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
Other discriminatory acts	1									1
Restriction of choices relative to a rental	1									1
Discriminatory acts under Section 818 (coercion, etc.)					1					1
Failure to provide an accessible building entrance					1					1
Failure to provide usable kitchens and bathrooms	1									1
Total Issues	8	4	7	3	6	0	5	0	0	33
Total Complaints	4	4	5	3	6		4			26

OHIO CIVIL RIGHTS COMMISSION COMPLAINTS

Table 43.E.6
Fair Housing Complaints by Basis
 43. City of Cuyahoga Falls
 2004–2012 OCRC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color		2					2	4		8
Disability	9	4	6	6	5		2	4		36
Family Status	1			3	4	1	2			11
Gender			2		2		2	2		8
Race	1	2	1	4	1	3	3	5		18
Religion							1			1
Retaliation	4		2	1	2					9
Total Bases	15	8	11	14	14	2	12	15	0	91
Total Complaints	11	6	9	10	8	2	6	7		59

Table 43.E.7
Fair Housing Complaints by Issue
 43. City of Cuyahoga Falls
 2004–2012 OCRC Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Advertising	1							1		2
Exclusion	2			1		1				4
Harassment	1				4	1		1		7
Intimidation	2				1			1		4
Other	6	6	1		1		2	1		17
Reasonable Accommodation	1		3				2			6
Sexual Harassment			1		1					2
Terms and Conditions	3	1	7	9	6	1	4	6		37
Total Issues	16	7	12	10	13	3	8	10	0	79
Total Complaints	11	6	9	10	8	2	6	7		59

Table 43.E.8
Fair Housing Complaints by Closure Status
 43. City of Cuyahoga Falls
 2004–2012 OCRC Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Administrative Closure	3				1	1		2		7
CP Failed to Cooperate				2	1					3
CP Withdrawal – No Benefit		1		1		1				3
No Cause Finding Issued	4	1	4	5	3		2	2		21
Settlement With Benefits	1	3	3	1	3		2	3		16
Withdrawal With Benefits	3	1	2	1			2			9
Total Complaints	11	6	9	10	8	2	6	7	0	59

FAIR HOUSING CONTACT SERVICE COMPLAINTS

Table 43.E.9
Fair Housing Complaints by Basis
 43. City of Cuyahoga Falls
 2004–2012 FHCS Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color				1					1	2
Disability	4	2	7	5	9	6	4	6	6	49
Familial Status			2	2	4	2	2			12
National Origin					2			1		3
Race			3	5		2	1	4	2	17
Retaliation			1						1	2
Sex						2	2	1	1	6
None			1							1
Total Bases	4	2	14	13	15	12	9	12	11	92
Total Complaints	4	2	13	10	15	8	8	12	7	79

Table 43.E.10
Fair Housing Complaints by Closure Status
 43. City of Cuyahoga Falls
 2004–2012 FHCS Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Closed			5	1	4	5	2	4	1	22
Elected not to pursue							1	1		2
Independently resolved						1	1	3		5
Inquiry			2	4	8	1	1		3	19
No contact							2	3	1	6
No probable cause			2	2		1		1		6
Pending				1						1
Probable cause				1						1
Reasonable accommodation granted							1			1
Settled			4	1	2					7
Settled through OCRC					1					1
Withdrawal of Charge									2	2
Missing	4	2								6
Total Complaints	4	2	13	10	15	8	8	12	7	79

F. FAIR HOUSING SURVEY FOR HOUSING STAKEHOLDERS DATA

No responses were received from Cuyahoga Falls 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 43.G.1
Housing Development
 43. City of Cuyahoga Falls
 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?	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?	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"?	No

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 Cuyahoga Falls. 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 Cuyahoga Falls.

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 Cuyahoga Falls.

Results of the Fair Housing Surveys indicate that Cuyahoga Falls may not have sufficient policies or practices that adequately address the duty to affirmatively further fair housing.

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 Cuyahoga Falls. 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:* Decisions regarding definitions of “family,” “dwelling unit,” and related terms

Decisions made within Cuyahoga Falls 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 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. Encourage adoption.

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 in Cuyahoga Falls. 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 43.H.1
Impediments Matrix
 43. City of Cuyahoga Falls
 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			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	Decisions regarding definitions of “family,” “dwelling unit,” and related terms									X	Disabled persons, families	L
5	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.

44. REMAINDER OF SUMMIT COUNTY

A. CENSUS BUREAU DATA

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

Table 44.A.1

Population by Age

44. Remainder of Summit County
2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Under 5	14,973	6.0%	13,506	5.1%	-9.8%
5 to 19	53,404	21.5%	53,912	20.2%	1.0%
20 to 24	9,916	4.0%	12,068	4.5%	21.7%
25 to 34	27,738	11.2%	26,286	9.9%	-5.2%
35 to 54	83,589	33.6%	80,733	30.3%	-3.4%
55 to 64	24,462	9.8%	38,126	14.3%	55.9%
65 or Older	34,470	13.9%	41,838	15.7%	21.4%
Total	248,552	100.0%	266,469	100.0%	7.2%

Table 44.A.2

Elderly Population by Age

44. Remainder of Summit County
2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
65 to 66	3,881	11.3%	5,154	12.3%	32.8%
67 to 69	5,657	16.4%	7,001	16.7%	23.8%
70 to 74	9,053	26.3%	9,375	22.4%	3.6%
75 to 79	7,395	21.5%	7,662	18.3%	3.6%
80 to 84	4,599	13.3%	6,474	15.5%	40.8%
85 or Older	3,885	11.3%	6,172	14.8%	58.9%
Total	34,470	100.0%	41,838	100.0%	21.4%

Table 44.A.3

Population by Race and Ethnicity

44. Remainder of Summit County
2000 & 2010 Census SF1 Data

Race	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
White	234,325	94.3%	242,097	90.9%	3.3%
Black	7,370	3.0%	12,275	4.6%	66.6%
American Indian	338	.1%	360	.1%	6.5%
Asian	3,762	1.5%	7,017	2.6%	86.5%
Native Hawaiian/ Pacific Islander	44	.0%	62	.0%	40.9%
Other	509	.2%	787	.3%	54.6%
Two or More Races	2,204	.9%	3,871	1.5%	75.6%
Total	248,552	100.0%	266,469	100.0%	7.2%
Non-Hispanic	246,772	99.3	263,095	98.7%	6.6%
Hispanic	1,780	.7%	3,374	1.3%	89.6%

Table 44.A.4**Disability by Age**44. Remainder of Summit 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%	0	.0%	0	.0%
5 to 17	1,070	4.6%	594	2.4%	1,664	3.5%
18 to 34	1,107	4.8%	851	4.0%	1,958	4.4%
35 to 64	4,540	7.9%	3,893	6.4%	8,433	7.2%
65 to 74	1,805	18.4%	2,299	20.7%	4,104	19.7%
75 or Older	3,494	47.4%	5,418	47.2%	8,912	47.3%
Total	12,016	9.4%	13,055	9.7%	25,071	9.5%

Table 44.A.5**Employment Status by Disability and Type: Age 18 to 64**44. Remainder of Summit County
2010 Three-Year ACS Data

Disability Status	Population
Employed:	125,998
With a disability:	4,154
With a hearing difficulty	1,515
With a vision difficulty	557
With a cognitive difficulty	1,089
With an ambulatory difficulty	1,536
With a self-care difficulty	536
With an independent living difficulty	1,009
No disability	121,844
Unemployed:	8,490
With a disability:	807
With a hearing difficulty	100
With a vision difficulty	184
With a cognitive difficulty	455
With an ambulatory difficulty	219
With a self-care difficulty	78
With an independent living difficulty	182
No disability	7,683
Not in labor force:	27,826
With a disability:	5,430
With a hearing difficulty	775
With a vision difficulty	517
With a cognitive difficulty	2,489
With an ambulatory difficulty	3,322
With a self-care difficulty	1,538
With an independent living difficulty	2,950
No disability	22,396
Total	162,314

Table 44.A.6**Households by Income**44. Remainder of Summit 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	7,530	8.0%	7,204	7.0%
\$15,000 to \$19,999	3,855	4.1%	3,609	3.5%
\$20,000 to \$24,999	4,500	4.8%	4,031	3.9%
\$25,000 to \$34,999	9,931	10.5%	9,462	9.1%
\$35,000 to \$49,999	14,593	15.4%	13,926	13.4%
\$50,000 to \$74,999	21,821	23.1%	21,144	20.4%
\$75,000 to \$99,999	14,175	15.0%	15,407	14.9%
\$100,000 or More	18,050	19.1%	28,858	27.8%
Total	94,455	100.0%	103,641	100.0%

Table 44.A.7**Poverty by Age**44. Remainder of Summit 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	747	8.0%	1,600	10.1%
6 to 17	2,119	22.6%	3,412	21.5%
18 to 64	4,973	53.1%	8,734	55.1%
65 or Older	1,530	16.3%	2,097	13.2%
Total	9,369	100.0%	15,843	100.0%
Poverty Rate	3.8%	.	6.1%	.

Table 44.A.8**Households by Year Home Built**44. Remainder of Summit 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	8,413	8.9%	7,468	7.2%
1940 to 1949	5,280	5.6%	5,003	4.8%
1950 to 1959	15,609	16.5%	15,429	14.9%
1960 to 1969	17,599	18.6%	16,209	15.6%
1970 to 1979	16,826	17.8%	16,788	16.2%
1980 to 1989	11,523	12.2%	11,344	10.9%
1990 to 1999	19,238	20.4%	18,298	17.7%
2000 to 2004	.	.	9,699	9.4%
2005 or Later	.	.	3,403	3.3%
Total	94,488	100.0%	103,641	100.0%

Table 44.A.9**Housing Units by Type**44. Remainder of Summit 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	81,827	82.9%	91,266	83.1%
Duplex	2,786	2.8%	2,257	2.1%
Tri- or Four-Plex	2,281	2.3%	2,557	2.3%
Apartment	9,918	10.0%	12,154	11.1%
Mobile Home	1,870	1.9%	1,594	1.5%
Boat, RV, Van, Etc.	16	.0%	12	.0%
Total	98,698	100.0%	109,840	100.0%

Table 44.A.10**Housing Units by Tenure**44. Remainder of Summit County
2000 & 2010 Census SF1 Data

Tenure	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
Occupied Housing Units	94,494	95.8%	105,765	93.8%	11.9%
Owner-Occupied	77,741	82.3%	84,425	79.8%	8.6%
Renter-Occupied	16,753	17.7%	21,340	20.2%	27.4%
Vacant Housing Units	4,181	4.2%	7,006	6.2%	67.6%
Total Housing Units	98,675	100.0%	112,771	100.0%	14.3%

Table 44.A.11**Disposition of Vacant Housing Units**44. Remainder of Summit County
2000 & 2010 Census SF1 Data

Disposition	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
For Rent	1,392	33.3%	2,244	32.0%	61.2%
For Sale	916	21.9%	1,579	22.5%	72.4%
Rented or Sold, Not Occupied	536	12.8%	441	6.3%	-17.7%
For Seasonal, Recreational, or Occasional Use	562	13.4%	809	11.5%	44.0%
For Migrant Workers	3	0.1%	1	.0%	-66.7%
Other Vacant	772	18.5%	1,932	27.6%	150.3%
Total	4,181	100.0%	7,006	100.0%	67.6%

Table 44.A.12**Households by Household Size**44. Remainder of Summit County
2000 & 2010 Census SF1 Data

Size	2000 Census		2010 Census		% Change 00-10
	Households	% of Total	Households	% of Total	
One Person	20,595	21.8%	26,283	24.9%	27.6%
Two Persons	33,796	35.8%	38,337	36.2%	13.4%
Three Persons	15,754	16.7%	16,865	15.9%	7.1%
Four Persons	15,534	16.4%	15,319	14.5%	-1.4%
Five Persons	6,350	6.7%	6,255	5.9%	-1.5%
Six Persons	1,822	1.9%	1,948	1.8%	6.9%
Seven Persons or More	643	.7%	758	.7%	17.9%
Total	94,494	100.0%	105,765	100.0%	11.9%

Table 44.A.13**Household Type by Tenure**44. Remainder of Summit County
2000 & 2010 Census SF1 Data

Household Type	2000 Census		2010 Census		% Change 00–10
	Households	% of Total	Households	% of Total	
Family Households	70,129	74.2%	74,453	70.4%	6.2%
Married-Couple Family	59,726	85.2%	60,894	81.8%	2.0%
Owner-Occupied	54,837	91.8%	55,624	91.3%	1.4%
Renter-Occupied	4,889	8.2%	5,270	8.7%	7.8%
Other Family	10,403	14.8%	13,559	18.2%	30.3%
Male Householder, No Spouse	2,773	26.7%	3,907	28.8%	40.9%
Owner-Occupied	2,005	72.3%	2,701	69.1%	34.7%
Renter-Occupied	768	27.7%	1,206	30.9%	57.0%
Female Householder, No Spouse	7,630	73.3%	9,652	71.2%	26.5%
Owner-Occupied	5,198	68.1%	6,167	63.9%	18.6%
Renter-Occupied	2,432	31.9%	3,485	36.1%	43.3%
Non-Family Households	24,365	25.8%	31,312	29.6%	28.5%
Owner-Occupied	15,701	64.4%	19,933	63.7%	27.0%
Renter-Occupied	8,664	35.6%	11,379	36.3%	31.3%
Total	94,494	100.0%	105,765	100.0%	11.9%

Table 44.A.14**Group Quarters Population**44. Remainder of Summit 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	5	.2%	10	.4%	100.0%
Juvenile Facilities	.	.	15	.7%	.
Nursing Homes	2,528	87.7%	2,092	90.9%	-17.2%
Other Institutions	348	12.1%	185	8.0%	-46.8%
Total	2,881	100.0%	2,302	100.0%	-20.1%
Noninstitutionalized					
College Dormitories	0	.0%	0	.0%	%
Military Quarters	0	.0%	0	.0%	%
Other Noninstitutional	562	100.0%	631	100.0%	12.3%
Total	562	16.3%	631	21.5%	12.3%
Total Group Quarters Population	3,443	100.0%	2,933	100.0%	-14.8%

Table 44.A.15**Overcrowding and Severe Overcrowding**44. Remainder of Summit 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	77,295	99.4%	396	.5%	66	.1%	77,757
2010 ACS	84,056	99.7%	219	.3%	38	.0%	84,313
Renter							
2000 Census	16,337	97.6%	268	1.6%	126	.8%	16,731
2010 ACS	19,083	98.7%	199	1.0%	46	.2%	19,328
Total							
2000 Census	93,632	99.1%	664	.7%	192	.2%	94,488
2010 ACS	103,139	99.5%	418	.4%	84	.1%	103,641

Table 44.A.16
Households with Incomplete Plumbing Facilities
 44. Remainder of Summit County
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Plumbing Facilities	94,349	103,292
Lacking Complete Plumbing Facilities	139	349
Total Households	94,488	103,641
Percent Lacking	.1%	.3%

Table 44.A.17
Households with Incomplete Kitchen Facilities
 44. Remainder of Summit County
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Kitchen Facilities	94,133	102,974
Lacking Complete Kitchen Facilities	355	667
Total Households	94,488	103,641
Percent Lacking	.4%	.6%

Table 44.A.18
Cost Burden and Severe Cost Burden by Tenure
 44. Remainder of Summit 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	40,345	78.0%	8,214	15.9%	3,076	5.9%	107	.2%	51,742
2010 ACS	42,103	69.6%	12,466	20.6%	5,793	9.6%	139	.2%	60,501
Owner Without a Mortgage									
2000 Census	17,898	89.9%	1,213	6.1%	584	2.9%	210	1.1%	19,905
2010 ACS	19,796	83.1%	2,471	10.4%	1,460	6.1%	85	.4%	23,812
Renter									
2000 Census	10,294	62.4%	2,906	17.6%	2,289	13.9%	996	6.0%	16,485
2010 ACS	10,550	54.6%	3,621	18.7%	3,822	19.8%	1,335	6.9%	19,328
Total									
2000 Census	68,537	77.8%	12,333	14.0%	5,949	6.8%	1,313	1.5%	88,132
2010 ACS	72,449	69.9%	18,558	17.9%	11,075	10.7%	1,559	1.5%	103,641

Table 44.A.19
Median Housing Costs
 44. Remainder of Summit County
 2000 Census SF3 & 2010 Five-Year ACS Data

Housing Cost	2000 Census	2010 ACS
Median Contract Rent	\$-864	\$-1,027
Median Home Value	\$-152,300	\$-172,800

B. BLS DATA

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

Table 44.B.1
Labor Force Statistics
 44. Remainder of Summit County
 1990–2011 BLS Data

Year	Labor Force	Employment	Unemployment	Unemployment Rate	Statewide Unemployment Rate
1990	114,489	110,502	3,987	3.5%	5.7%
1991	115,629	110,869	4,760	4.1%	6.6%
1992	117,508	111,956	5,552	4.7%	7.4%
1993	118,528	113,549	4,979	4.2%	6.7%
1994	121,425	117,261	4,164	3.4%	5.6%
1995	122,694	118,856	3,838	3.1%	4.9%
1996	124,193	120,167	4,026	3.2%	5.0%
1997	124,748	120,909	3,839	3.1%	4.6%
1998	124,059	120,572	3,487	2.8%	4.3%
1999	125,065	121,422	3,643	2.9%	4.3%
2000	132,630	128,978	3,652	2.8%	4.0%
2001	132,435	128,402	4,033	3.0%	4.4%
2002	132,085	126,813	5,272	4.0%	5.7%
2003	137,743	129,974	7,769	5.6%	6.2%
2004	139,349	131,671	7,678	5.5%	6.1%
2005	141,926	134,517	7,409	5.2%	5.9%
2006	144,220	137,370	6,850	4.7%	5.4%
2007	144,828	137,703	7,125	4.9%	5.6%
2008	145,739	137,493	8,246	5.7%	6.5%
2009	144,058	130,863	13,195	9.2%	10.1%
2010	146,169	132,721	13,448	9.2%	10.0%
2011	143,896	132,569	11,327	7.9%	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 44.C.1

Purpose of Loan by Year
44. Remainder of Summit County
2004–2011 HMDA Data

Purpose	2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	9,430	10,631	9,430	7,167	5,102	4,932	4,607	4,404	55,703
Home Improvement	1,523	1,904	1,771	1,443	1,038	533	408	436	9,056
Refinancing	16,154	15,285	13,551	9,837	7,022	12,226	12,195	9,965	96,235
Total	27,107	27,820	24,752	18,447	13,162	17,691	17,210	14,805	160,994

Table 44.C.2

Occupancy Status for Home Purchase Loan Applications
44. Remainder of Summit County
2004–2011 HMDA Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	Total
Owner-Occupied	8,908	10,041	8,826	6,747	4,841	4,802	4,455	4,216	52,836
Not Owner-Occupied	456	538	569	377	246	122	151	184	2,643
Not Applicable	66	52	35	43	15	8	1	4	224
Total	9,430	10,631	9,430	7,167	5,102	4,932	4,607	4,404	55,703

Table 44.C.3

Owner-Occupied Home Purchase Loan Applications by Loan Type
44. Remainder of Summit County
2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Conventional	8,412	9,509	8,308	6,155	3,222	2,283	2,219	2,368	42,476
FHA - Insured	416	437	426	465	1,471	2,337	2,056	1,632	9,240
VA - Guaranteed	80	94	92	127	147	182	178	214	1,114
Rural Housing Service or Farm Service Agency	0	1	0	0	1	0	2	2	6
Total	8,908	10,041	8,826	6,747	4,841	4,802	4,455	4,216	52,836

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 44.C.4
Loan Applications by Action Taken
 44. Remainder of Summit County
 2004–2011 HMDA Data

Action	2004	2005	2006	2007	2008	2009	2010	2011	Total
Loan Originated	5,481	5,942	5,053	3,847	2,762	2,494	2,368	2,179	30,126
Application Approved but not Accepted	512	498	496	337	198	128	159	101	2,429
Application Denied	565	792	722	534	364	290	271	274	3,812
Application Withdrawn by Applicant	556	715	470	307	253	212	248	220	2,981
File Closed for Incompleteness	170	180	131	81	62	47	34	27	732
Loan Purchased by the Institution	1,624	1,908	1,952	1,641	1,201	1,630	1,375	1,415	12,746
Preapproval Request Denied	0	5	2	0	1	0	0	0	8
Preapproval Approved but not Accepted	0	1	0	0	0	1	0	0	2
Total	8,908	10,041	8,826	6,747	4,841	4,802	4,455	4,216	52,836
Denial Rate	9.3%	11.8%	12.5%	12.2%	11.6%	10.4%	10.3%	11.2%	11.2%

Table 44.C.5
Denial Rates by Gender of Applicant
 44. Remainder of Summit County
 2004–2011 HMDA Data

Year	Male	Female	Not Available	Not Applicable	Average
2004	8.5%	10.0%	28.5%	.0%	9.3%
2005	9.9%	15.2%	25.9%	%	11.8%
2006	10.4%	16.2%	24.5%	.0%	12.5%
2007	10.8%	14.4%	27.0%	.0%	12.2%
2008	10.3%	13.1%	26.1%	.0%	11.6%
2009	9.5%	11.3%	19.8%	%	10.4%
2010	9.4%	11.9%	13.2%	100.0%	10.3%
2011	10.4%	11.8%	17.3%	%	11.2%
Average	9.8%	13.4%	23.2%	12.5%	11.2%

Table 44.C.6
Loan Applications by Selected Action Taken by Gender of Applicant
 44. Remainder of Summit County
 2004–2011 HMDA Data

Gender		2004	2005	2006	2007	2008	2009	2010	2011	Total
Male	Originated	3,993	4,283	3,516	2,751	1,897	1,701	1,631	1,491	21,263
	Denied	369	470	406	332	217	179	169	173	2,315
	Denial Rate	8.5%	9.9%	10.4%	10.8%	10.3%	9.5%	9.4%	10.4%	9.8%
Female	Originated	1,379	1,516	1,393	1,001	779	712	638	573	7,991
	Denied	153	272	270	168	117	91	86	77	1,234
	Denial Rate	10.0%	15.2%	16.2%	14.4%	13.1%	11.3%	11.9%	11.8%	13.4%
Not Available	Originated	108	143	142	92	85	81	99	115	865
	Denied	43	50	46	34	30	20	15	24	262
	Denial Rate	28.5%	25.9%	24.5%	27.0%	26.1%	19.8%	13.2%	17.3%	23.2%
Not Applicable	Originated	1	0	2	3	1	0	0	0	7
	Denied	0	0	0	0	0	0	1	0	1
	Denial Rate	.0%	%	.0%	.0%	.0%	%	100.0%	%	12.5%
Total	Originated	5,481	5,942	5,053	3,847	2,762	2,494	2,368	2,179	30,126
	Denied	565	792	722	534	364	290	271	274	3,812
	Denial Rate	9.3%	11.8%	12.5%	12.2%	11.6%	10.4%	10.3%	11.2%	11.2%

Table 44.C.7
Denial Rates by Race/Ethnicity of Applicant
 44. Remainder of Summit County
 2004–2011 HMDA Data

Race/Ethnicity	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	.0%	7.7%	37.5%	.0%	28.6%	14.3%	20.0%	25.0%	13.8%
Asian	6.5%	10.3%	11.3%	10.2%	8.3%	12.4%	6.8%	13.9%	9.8%
Black	18.9%	19.3%	29.3%	35.7%	21.2%	22.2%	16.5%	22.0%	23.9%
White	7.6%	10.3%	10.2%	9.8%	10.5%	9.4%	9.7%	9.6%	9.6%
Not Available	27.0%	22.6%	22.2%	26.4%	21.8%	16.4%	16.0%	21.3%	22.5%
Not Applicable	20.0%	%	.0%	.0%	.0%	0%	0%	%	9.1%
Average	9.3%	11.8%	12.5%	12.2%	11.6%	10.4%	10.3%	11.2%	11.2%
Non-Hispanic	8.3%	10.8%	11.6%	11.1%	11.0%	9.9%	9.7%	10.2%	10.4%
Hispanic	8.8%	24.1%	26.9%	23.5%	.0%	15.6%	23.1%	10.3%	18.6%

Table 44.C.8
Loan Applications by Selected Action Taken by Race/Ethnicity of Applicant
 44. Remainder of Summit County
 2004–2011 HMDA Data

Race		2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Originated	11	12	5	10	5	6	4	3	56
	Denied	0	1	3	0	2	1	1	1	9
	Denial Rate	.0%	7.7%	37.5%	.0%	28.6%	20.0%	20.0%	25.0%	13.8%
Asian	Originated	172	156	157	123	110	85	82	68	953
	Denied	12	18	20	14	10	12	6	11	103
	Denial Rate	6.5%	10.3%	11.3%	10.2%	8.3%	12.4%	6.8%	13.9%	9.8%
Black	Originated	296	372	321	162	108	84	86	85	1,514
	Denied	69	89	133	90	29	24	17	24	475
	Denial Rate	18.9%	19.3%	29.3%	35.7%	21.2%	22.2%	16.5%	22.0%	23.9%
White	Originated	4,757	5,053	4,302	3,371	2,387	2,186	2,049	1,875	25,980
	Denied	394	582	490	366	281	227	219	198	2,757
	Denial Rate	7.6%	10.3%	10.2%	9.8%	10.5%	9.4%	9.7%	9.6%	9.6%
Not Available	Originated	241	349	266	178	151	133	147	148	1,613
	Denied	89	102	76	64	42	26	28	40	467
	Denial Rate	27.0%	22.6%	22.2%	26.4%	21.8%	16.4%	16.0%	21.3%	22.5%
Not Applicable	Originated	4	0	2	3	1	0	0	0	10
	Denied	1	0	0	0	0	0	0	0	1
	Denial Rate	27.0%	22.6%	22.2%	26.4%	21.8%	16.4%	16.0%	21.3%	9.1%
Total	Originated	5,481	5,942	5,053	3,847	2,762	2,494	2,368	2,179	30,126
	Denied	565	792	722	534	364	290	271	274	3,812
	Denial Rate	9.3%	11.8%	12.5%	12.2%	11.6%	10.4%	10.3%	11.2%	11.2%
Non-Hispanic	Originated	4,536	5,487	4,733	3,621	2,555	2,338	2,190	2,011	27,471
	Denied	411	664	620	454	317	257	236	229	3,188
	Denial Rate	8.3%	10.8%	11.6%	11.1%	11.0%	9.9%	9.7%	10.2%	10.4%
Hispanic	Originated	62	63	57	39	29	27	30	26	333
	Denied	6	20	21	12	0	5	9	3	76
	Denial Rate	8.8%	24.1%	26.9%	23.5%	.0%	15.6%	23.1%	10.3%	18.6%

Table 44.C.9
Loan Applications by Reason for Denial
 44. Remainder of Summit County
 2004–2011 HMDA Data

Denial Reason	2004	2005	2006	2007	2008	2009	2010	2011	Total
Debt-to-Income Ratio	71	118	97	87	64	63	58	44	602
Employment History	7	12	5	9	5	8	12	7	65
Credit History	124	153	129	100	76	58	56	66	762
Collateral	43	64	73	63	59	61	54	50	467
Insufficient Cash	10	12	16	7	5	5	8	8	71
Unverifiable Information	15	24	33	47	13	10	8	9	159
Credit Application Incomplete	71	78	48	54	36	17	18	46	368
Mortgage Insurance Denied	0	0	0	0	2	4	1	0	7
Other	95	207	126	64	36	22	22	19	591
Missing	129	124	195	103	68	42	34	25	720
Total	565	792	722	534	364	290	271	274	3,812

Table 44.C.10
Denial Rates by Income of Applicant
 44. Remainder of Summit County
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	56.3%	50.0%	37.9%	75.0%	40.0%	63.6%	25.0%	50.0%	49.0%
\$15,001–\$30,000	16.5%	28.2%	22.9%	21.7%	25.1%	16.0%	19.4%	24.8%	21.8%
\$30,001–\$45,000	13.9%	14.5%	16.4%	15.5%	14.8%	12.2%	14.7%	13.2%	14.5%
\$45,001–\$60,000	9.8%	13.4%	13.7%	12.7%	12.9%	9.7%	9.8%	11.7%	11.9%
\$60,001–\$75,000	7.8%	9.7%	13.0%	11.8%	9.1%	10.3%	7.7%	10.9%	10.1%
Above \$75,000	6.0%	7.9%	9.4%	10.0%	8.5%	7.6%	7.7%	8.0%	8.2%
Data Missing	14.3%	16.7%	14.0%	11.5%	7.7%	20.7%	29.0%	25.8%	15.5%
Total	9.3%	11.8%	12.5%	12.2%	11.6%	10.4%	10.3%	11.2%	11.2%

Table 44.C.11
Denial Rates of Loans by Race/Ethnicity and Income of Applicant
 44. Remainder of Summit County
 2004–2011 HMDA Data

Race	<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	Above \$75K	Data Missing	Average
American Indian	%	40.0%	16.7%	22.2%	25.0%	.0%	.0%	13.8%
Asian	100.0%	26.9%	22.2%	10.9%	8.4%	7.0%	5.9%	9.8%
Black	30.0%	36.7%	30.5%	23.6%	25.0%	21.3%	26.2%	23.9%
White	49.2%	19.3%	12.5%	10.5%	8.2%	6.7%	11.4%	9.6%
Not Available	50.0%	57.0%	31.4%	22.6%	19.5%	14.5%	45.4%	22.5%
Not Applicable	%	%	100.0%	%	%	.0%	.0%	9.1%
Average	49.0%	21.8%	14.5%	11.9%	10.1%	8.2%	15.5%	11.2%
Non-Hispanic Ethnicity	48.1%	19.5%	13.1%	11.3%	9.5%	7.7%	12.4%	10.4%
Hispanic (Ethnicity)	%	34.8%	29.6%	12.5%	13.8%	17.4%	16.7%	18.6%

Table 44.C.12
Loan Applications by Reason for Denial by Race/Ethnicity of Applicant
 44. Remainder of Summit County
 2004–2011 HMDA Data

Denial Reason	American Indian	Asian	Black	White	Not Available	Not Applicable	Total	Hispanic (Ethnicity)
Debt-to-Income Ratio	1	30	81	425	65	0	602	20
Employment History	0	3	6	53	3	0	65	0
Credit History	1	14	99	557	91	0	762	18
Collateral	0	9	44	365	49	0	467	7
Insufficient Cash	1	2	8	49	11	0	71	2
Unverifiable Information	0	9	31	102	17	0	159	1
Credit Application Incomplete	1	8	28	283	48	0	368	5
Mortgage Insurance Denied	1	0	0	5	1	0	7	0
Other	2	12	80	418	78	1	591	16
Missing	2	16	98	500	104	0	720	7
Total	9	103	475	2,757	467	1	3,812	76
% Missing	22.2%	15.5%	20.6%	18.1%	22.3%	.0%	18.9%	9.2%

Table 44.C.13
Loan Applications by Income of Applicant: Originated and Denied
 44. Remainder of Summit County
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Loan Originated	7	17	18	2	12	8	6	4	74
	Application Denied	9	17	11	6	8	14	2	4	71
	Denial Rate	56.3%	50.0%	37.9%	75.0%	40.0%	63.6%	25.0%	50.0%	49.0%
\$15,001–\$30,000	Loan Originated	313	252	202	173	146	168	150	115	1,519
	Application Denied	62	99	60	48	49	32	36	38	424
	Denial Rate	16.5%	28.2%	22.9%	21.7%	25.1%	16.0%	19.4%	24.8%	21.8%
\$30,001–\$45,000	Loan Originated	811	893	651	518	438	474	349	309	4,443
	Application Denied	131	152	128	95	76	66	60	47	755
	Denial Rate	13.9%	14.5%	16.4%	15.5%	14.8%	12.2%	14.7%	13.2%	14.5%
\$45,001–\$60,000	Loan Originated	1,007	1,026	828	633	486	455	406	339	5,180
	Application Denied	109	159	131	92	72	49	44	45	701
	Denial Rate	9.8%	13.4%	13.7%	12.7%	12.9%	9.7%	9.8%	11.7%	11.9%
\$60,001–\$75,000	Loan Originated	866	886	710	532	350	340	300	311	4,295
	Application Denied	73	95	106	71	35	39	25	38	482
	Denial Rate	7.8%	9.7%	13.0%	11.8%	9.1%	10.3%	7.7%	10.9%	10.1%
Above \$75,000	Loan Originated	2,250	2,653	2,429	1,912	1,306	1,026	1,135	1,078	13,789
	Application Denied	143	227	251	212	122	84	95	94	1,228
	Denial Rate	6.0%	7.9%	9.4%	10.0%	8.5%	7.6%	7.7%	8.0%	8.2%
Data Missing	Loan Originated	227	215	215	77	24	23	22	23	826
	Application Denied	38	43	35	10	2	6	9	8	151
	Denial Rate	14.3%	16.7%	14.0%	11.5%	7.7%	20.7%	29.0%	25.8%	15.5%
Total	Loan Originated	5,481	5,942	5,053	3,847	2,762	2,494	2,368	2,179	30,126
	Application Denied	565	792	722	534	364	290	271	274	3,812
	Denial Rate	9.3%	11.8%	12.5%	12.2%	11.6%	10.4%	10.3%	11.2%	11.2%

Table 44.C.14
Loan Applications by Income and Race/Ethnicity of Applicant: Originated and Denied
 44. Remainder of Summit 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	15	7	6	22	3	56
	Application Denied	0	2	3	2	2	0	0	9
	Denial Rate	%	40.0%	16.7%	22.2%	25.0%	.0%	.0%	13.8%
Asian	Loan Originated	0	19	70	122	152	558	32	953
	Application Denied	3	7	20	15	14	42	2	103
	Denial Rate	100.0%	26.9%	22.2%	10.9%	8.4%	7.0%	5.9%	9.8%
Black	Loan Originated	7	31	146	246	267	772	45	1,514
	Application Denied	3	18	64	76	89	209	16	475
	Denial Rate	30.0%	36.7%	30.5%	23.6%	25.0%	21.3%	26.2%	23.9%
White	Loan Originated	61	1,423	4,009	4,559	3,663	11,573	692	25,980
	Application Denied	59	340	574	536	327	832	89	2,757
	Denial Rate	49.2%	19.3%	12.5%	10.5%	8.2%	6.7%	11.4%	9.6%
Not Available	Loan Originated	6	43	203	246	207	855	53	1,613
	Application Denied	6	57	93	72	50	145	44	467
	Denial Rate	50.0%	57.0%	31.4%	22.6%	19.5%	14.5%	45.4%	22.5%
Not Applicable	Loan Originated	0	0	0	0	0	9	1	10
	Application Denied	0	0	1	0	0	0	0	1
	Denial Rate	%	%	100.0%	%	%	.0%	.0%	9.1%
Total	Loan Originated	74	1,519	4,443	5,180	4,295	13,789	826	30,126
	Application Denied	71	424	755	701	482	1,228	151	3,812
	Denial Rate	49.0%	21.8%	14.5%	11.9%	10.1%	8.2%	15.5%	11.2%
Non-Hispanic Ethnicity	Loan Originated	69	1,422	4,130	4,742	3,944	12,431	733	27,471
	Application Denied	64	345	624	604	415	1,032	104	3,188
	Denial Rate	48.1%	19.5%	13.1%	11.3%	9.5%	7.7%	12.4%	10.4%
Hispanic (Ethnicity)	Loan Originated	0	15	38	63	50	157	10	333
	Application Denied	0	8	16	9	8	33	2	76
	Denial Rate	%	34.8%	29.6%	12.5%	13.8%	17.4%	16.7%	18.6%

PREDATORY LENDING

Table 44.C.15
Originated Owner-Occupied Loans by HAL Status
 44. Remainder of Summit County
 2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Other	5,042	4,980	4,211	3,559	2,540	2,358	2,360	2,177	27,227
HAL	439	962	842	288	222	136	8	2	2,899
Total	5,481	5,942	5,053	3,847	2,762	2,494	2,368	2,179	30,126
Percent HAL	8.0%	16.2%	16.7%	7.5%	8.0%	5.5%	.3%	.1%	9.6%

Table 44.C.16
Loans by Loan Purpose by HAL Status
 44. Remainder of Summit County
 2004–2011 HMDA Data

Loan Purpose		2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	Other	5,042	4,980	4,211	3,559	2,540	2,358	2,360	2,177	27,227
	HAL	439	962	842	288	222	136	8	2	2,899
	Percent HAL	8.0%	16.2%	16.7%	7.5%	8.0%	5.5%	.3%	.1%	9.6%
Home Improvement	Other	496	591	576	452	341	133	124	138	2,851
	HAL	106	148	151	113	63	28	17	11	637
	Percent HAL	17.6%	20.0%	20.8%	20.0%	15.6%	17.4%	12.1%	7.4%	18.3%
Refinancing	Other	5,807	4,137	3,498	2,842	2,438	5,823	6,198	4,915	35,658
	HAL	800	1,243	1,145	581	232	227	37	28	4,293
	Percent HAL	12.1%	23.1%	24.7%	17.0%	8.7%	3.8%	.6%	.6%	10.7%
Total	Other	11,345	9,708	8,285	6,853	5,319	8,314	8,682	7,230	65,736
	HAL	1,345	2,353	2,138	982	222	136	8	2	7,829
	Percent HAL	10.6%	19.5%	20.5%	12.5%	8.9%	4.5%	.7%	.6%	10.6%

Table 44.C.17
HALs Originated by Race of Borrower
 44. Remainder of Summit County
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	0	1	0	1	0	0	0	0	2
Asian	0	3	8	5	8	2	0	0	26
Black	53	136	144	36	10	6	0	0	385
White	349	679	608	223	190	123	8	2	2,182
Not Available	37	143	80	23	14	5	0	0	302
Not Applicable	0	0	2	0	0	0	0	0	2
Total	439	962	842	288	222	136	8	2	2,899
Hispanic (Ethnicity)	5	15	12	5	3	0	0	0	40

Table 44.C.18
Rate of HALs Originated by Race/Ethnicity of Borrower
 44. Remainder of Summit County
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	.0%	8.3%	.0%	10.0%	.0%	.0%	.0%	.0%	3.6%
Asian	.0%	1.9%	5.1%	4.1%	7.3%	2.4%	.0%	.0%	2.7%
Black	17.9%	36.6%	44.9%	22.2%	9.3%	7.1%	.0%	.0%	25.4%
White	7.3%	13.4%	14.1%	6.6%	8.0%	5.6%	.4%	.1%	8.4%
Not Available	15.4%	41.0%	30.1%	12.9%	9.3%	3.8%	.0%	.0%	18.7%
Not Applicable	.0%	%	100.0%	.0%	.0%	%	%	%	20%
Average	8.0%	16.2%	16.7%	7.5%	8.0%	5.5%	0.3%	0.1%	9.6%
Non-Hispanic Ethnicity	7.9%	14.5%	15.9%	7.2%	7.5%	5.4%	.4%	.1%	9.1%
Hispanic (Ethnicity)	8.1%	23.8%	21.1%	12.8%	10.3%	.0%	.0%	.0%	12.0%

Table 44.C.19
Loans by HAL Status by Race/Ethnicity of Borrower
 44. Remainder of Summit County
 2004–2011 HMDA Data

Race	Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Other	11	11	5	9	5	6	4	3	54
	HAL	0	1	0	1	0	0	0	0	2
	Percent HAL	.0%	8.3%	.0%	10.0%	.0%	.0%	.0%	.0%	3.6%
Asian	Other	172	153	149	118	102	83	82	68	927
	HAL	0	3	8	5	8	2	0	0	26
	Percent HAL	.0%	1.9%	5.1%	4.1%	7.3%	2.4%	.0%	.0%	2.7%
Black	Other	243	236	177	126	98	78	86	85	1,129
	HAL	53	136	144	36	10	6	0	0	385
	Percent HAL	17.9%	36.6%	44.9%	22.2%	9.3%	7.1%	.0%	.0%	25.4%
White	Other	4,408	4,374	3,694	3,148	2,197	2,063	2,041	1,873	23,798
	HAL	349	679	608	223	190	123	8	2	2,182
	Percent HAL	7.3%	13.4%	14.1%	6.6%	8.0%	5.6%	0.4%	0.1%	8.4%
Not Available	Other	204	206	186	155	137	128	147	148	1,311
	HAL	37	143	80	23	14	5	0	0	302
	Percent HAL	15.4%	41.0%	30.1%	12.9%	9.3%	3.8%	.0%	.0%	18.7%
Not Applicable	Other	4	0	0	3	1	0	0	0	8
	HAL	0	0	2	0	0	0	0	0	2
	Percent HAL	.0%	%	100.0%	.0%	.0%	%	%	%	20.0%
Total	Other	5,042	4,980	4,211	3,559	2,540	2,358	2,360	2,177	27,227
	HAL	439	962	842	288	222	136	8	2	2,899
	Percent HAL	8.0%	16.2%	16.7%	7.5%	8.0%	5.5%	.3%	.1%	9.6%
Non-Hispanic Ethnicity	Other	4,177	4,692	3,982	3,359	2,364	2,211	2,182	2,009	24,976
	HAL	359	795	751	262	191	127	8	2	2,495
	Percent HAL	7.9%	14.5%	15.9%	7.2%	7.5%	5.4%	.4%	.1%	9.1%
Hispanic (Ethnicity)	Other	57	48	45	34	26	27	30	26	293
	HAL	5	15	12	5	3	0	0	0	40
	Percent HAL	8.1%	23.8%	21.1%	12.8%	10.3%	.0%	.0%	.0%	12.0%

Table 44.C.20
Rates of HALs by Income of Borrower
 44. Remainder of Summit County
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Average
\$15,000 or Below	.0%	11.8%	11.1%	50.0%	8.3%	12.5%	.0%	.0%	9.5%
\$15,001–\$30,000	11.2%	21.8%	18.3%	17.9%	12.3%	9.5%	.7%	.9%	12.8%
\$30,001–\$45,000	12.2%	26.7%	21.4%	10.6%	11.6%	7.8%	.3%	.0%	14.0%
\$45,001–\$60,000	11.3%	20.9%	21.9%	8.5%	8.6%	6.4%	.2%	.0%	12.3%
\$60,001–\$75,000	7.5%	17.4%	13.5%	8.5%	7.7%	3.2%	.7%	.3%	9.3%
Above \$75,000	5.2%	10.1%	13.2%	4.7%	6.3%	4.1%	0.3%	.0%	6.7%
Data Missing	4.0%	14.4%	31.2%	16.9%	4.2%	.0%	.0%	.0%	14.6%
Average	8.0%	16.2%	16.7%	7.5%	8.0%	5.5%	.3%	.1%	9.6%

Table 44.C.21
Loans by HAL Status by Income of Borrower
 44. Remainder of Summit County
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Other	7	15	16	1	11	7	6	4	67
	HAL	0	2	2	1	1	1	0	0	7
	Percent HAL	.0%	11.8%	11.1%	50.0%	8.3%	12.5%	.0%	.0%	9.5%
\$15,001–\$30,000	Other	278	197	165	142	128	152	149	114	1,325
	HAL	35	55	37	31	18	16	1	1	194
	Percent HAL	11.2%	21.8%	18.3%	17.9%	12.3%	9.5%	.7%	.9%	12.8%
\$30,001–\$45,000	Other	712	655	512	463	387	437	348	309	3,823
	HAL	99	238	139	55	51	37	1	0	620
	Percent HAL	12.2%	26.7%	21.4%	10.6%	11.6%	7.8%	.3%	.0%	14.0%
\$45,001–\$60,000	Other	893	812	647	579	444	426	405	339	4,545
	HAL	114	214	181	54	42	29	1	0	635
	Percent HAL	11.3%	20.9%	21.9%	8.5%	8.6%	6.4%	.2%	.0%	12.3%
\$60,001–\$75,000	Other	801	732	614	487	323	329	298	310	3,894
	HAL	65	154	96	45	27	11	2	1	401
	Percent HAL	7.5%	17.4%	13.5%	8.5%	7.7%	3.2%	.7%	.3%	9.3%
Above \$75,000	Other	2,133	2,385	2,109	1,823	1,224	984	1,132	1,078	12,868
	HAL	117	268	320	89	82	42	3	0	921
	Percent HAL	5.2%	10.1%	13.2%	4.7%	6.3%	4.1%	.3%	.0%	6.7%
Data Missing	Other	218	184	148	64	23	23	22	23	705
	HAL	9	31	67	13	1	0	0	0	121
	Percent HAL	4.0%	14.4%	31.2%	16.9%	4.2%	.0%	.0%	.0%	14.6%
Total	Other	5,042	4,980	4,211	3,559	2,540	2,358	2,360	2,177	27,227
	HAL	439	962	842	288	222	136	8	2	2,899
	Percent HAL	8.0%	16.2%	16.7%	7.5%	8.0%	5.5%	.3%	.1%	9.6%

D. CRA DATA

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

Table 44.D.1
Small Business Loans Originated: \$100,000 or Less by Tract MFI
 44. Remainder of Summit 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	185	0	2,240	2,647		5,072
2001	184	0	2,504	2,719		5,407
2002	214	0	3,140	3,191		6,545
2003	0	142	2,469	4,167		6,778
2004	0	136	2,357	4,089		6,582
2005	0	139	2,626	4,565		7,330
2006	0	184	3,341	6,978		10,503
2007	0	212	3,576	7,643		11,431
2008	0	155	2,731	5,759		8,645
2009	0	74	1,193	2,607		3,874
2010	0	52	1,016	2,224		3,292
2011	0	67	1,348	2,894		4,309
Total	583	1,161	28,541	49,483	0	79,768
Loan Amount (\$1,000s)						
2000	2,647	0	32,183	34,947		69,777
2001	3,374	0	34,276	33,949		71,599
2002	3,355	0	37,080	38,068		78,503
2003	0	1,239	25,455	44,875		71,569
2004	0	1,473	25,974	46,445		73,892
2005	0	1,267	32,085	54,357		87,709
2006	0	2,374	34,842	72,141		109,357
2007	0	2,410	37,315	79,042		118,767
2008	0	1,713	28,162	60,558		90,433
2009	0	815	14,531	31,644		46,990
2010	0	789	14,289	32,365		47,443
2011	0	1,093	21,990	43,924		67,007
Total	9,376	13,173	338,182	572,315	0	933,046

Table 44.D.2
Small Business Loans Originated: \$100,001 to \$250,000 by Tract MFI
 44. Remainder of Summit 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	18	0	108	122		248
2001	10	0	128	163		301
2002	16	0	157	157		330
2003	0	6	94	156		256
2004	0	6	89	175		270
2005	0	4	104	164		272
2006	0	7	98	191		296
2007	0	4	80	202		286
2008	0	5	62	118		185
2009	0	7	60	100		167
2010	0	2	72	165		239
2011	0	1	69	152		222
Total	44	42	1,121	1,865	0	3,072
Loan Amount (\$1,000s)						
2000	3,369	0	18,969	21,601		43,939
2001	1,976	0	22,320	29,127		53,423
2002	3,032	0	26,973	26,973		56,978
2003	0	1,050	15,965	28,514		45,529
2004	0	986	16,146	30,408		47,540
2005	0	665	19,121	30,206		49,992
2006	0	989	17,916	34,011		52,916
2007	0	645	14,015	36,117		50,777
2008	0	602	10,697	21,184		32,483
2009	0	1,143	11,217	17,788		30,148
2010	0	400	12,438	29,512		42,350
2011	0	150	12,689	26,941		39,780
Total	8,377	6,630	198,466	332,382	0	545,855

Table 44.D.3
Small Business Loans Originated: More than \$250,000 by Tract MFI
 44. Remainder of Summit 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	11	0	71	128		210
2001	13	0	115	153		281
2002	23	0	168	217		408
2003	0	2	100	220		322
2004	0	3	87	206		296
2005	0	1	106	218		325
2006	0	2	104	203		309
2007	0	3	74	196		273
2008	0	2	64	184		250
2009	0	5	58	118		181
2010	0	1	49	154		204
2011	0	6	63	171		240
Total	47	25	1,059	2,168	0	3,299
Loan Amount (\$1,000s)						
2000	6,216	0	35,373	63,939		105,528
2001	6,565	0	62,480	79,518		148,563
2002	13,436	0	89,995	115,264		218,695
2003	0	798	51,885	116,085		168,768
2004	0	1,950	43,542	111,448		156,940
2005	0	350	54,374	119,502		174,226
2006	0	657	55,995	115,327		171,979
2007	0	2,300	39,916	102,993		145,209
2008	0	1,150	33,407	104,212		138,769
2009	0	3,333	29,756	65,690		98,779
2010	0	251	27,056	90,246		117,553
2011	0	3,687	33,306	95,945		132,938
Total	26,217	14,476	557,085	1,180,169	0	1,777,947

Table 44.D.4
Small Business Loans to Businesses with Gross Annual Revenues of Less Than \$1 Million by Tract MFI
 44. Remainder of Summit 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	69	0	908	1,006		1,983
2001	78	0	1,049	1,225		2,352
2002	50	0	897	1,047		1,994
2003	0	35	789	1,310		2,134
2004	0	37	800	1,334		2,171
2005	0	63	1,180	2,000		3,243
2006	0	63	1,337	2,398		3,798
2007	0	71	1,390	2,568		4,029
2008	0	55	870	1,620		2,545
2009	0	15	414	852		1,281
2010	0	14	404	691		1,109
2011	0	29	659	1,250		1,938
Total	197	382	10,697	17,301	0	28,577
Loan Amount (\$1,000s)						
2000	2,668	0	37,867	54,035		94,570
2001	3,582	0	49,314	57,220		110,116
2002	3,788	0	59,931	83,608		147,327
2003	0	1,776	32,307	73,938		108,021
2004	0	1,080	26,812	60,086		87,978
2005	0	734	36,179	73,852		110,765
2006	0	1,723	32,942	71,208		105,873
2007	0	1,221	29,741	64,065		95,027
2008	0	1,158	22,421	51,173		74,752
2009	0	1,007	12,486	31,691		45,184
2010	0	390	17,050	41,111		58,551
2011	0	2,470	23,492	39,544		65,506
Total	10,038	11,559	380,542	701,531	0	1,103,670

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 44.E.1
Fair Housing Complaints by Basis
 44. Remainder of Summit County
 2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color	1		0	1	3	2	0		0	7
Disability	5	7	10	6	2	6	6	5	1	48
Family Status	6	2	5	4	1	12	2	5	0	37
National Origin	0		1	1	0	1	0	1	0	4
Race	10	5	7	3	8	8	3	4	2	50
Religion	0	0			0	0	0			0
Sex	2	3	0	0	0	3	0	1	3	12
Total Bases	24	17	23	15	14	32	11	16	6	158
Total Complaints	23	14	20	12	11	22	10	15	5	132

Table 44.E.2
Fair Housing Complaints by Issue
 44. Remainder of Summit County
 2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Discriminatory refusal to rent and negotiate for rental	0	1	0	2	1	1		0	0	5
Discriminatory advertising, statements, and notices	0	0	1	0	0	2	1	1	0	5
False denial or representation of availability - rental	0		1		2	2	0			5
Other discriminatory acts	2	0	1	0	1	0	1	0	0	5
Discriminatory acts under Section 818 (coercion, etc.)	0	0	2	0		0	0	1	2	5
Discriminatory refusal to negotiate for rental	1		0			1	1	1		4
Non-compliance with design and construction requirements (handicap)	1		1	2						4
Discrimination in terms, conditions or privileges relating to rental	5	2	6	4	4	4	3	3	0	31
Discrimination in terms, conditions, privileges relating to sale	0	1			1				1	3
Discrimination in services and facilities relating to rental	0	2	1	0	0		0	0		3
Discriminatory refusal to rent	4	1	5	3	4	1	2	2	1	23
Discriminatory terms, conditions, privileges, or services and facilities	5	3	3	1	0	5	1	1	3	22
Discriminatory refusal to sell		1						0	1	2
Discriminatory advertising - sale	2									2
Discrimination in making of loans	0	1					1			2
Discrimination in the terms or conditions for making loans	0		0					2		2
Discrimination in terms and conditions of membership	2	0								2
Failure to provide accessible and usable public and common user areas	1		1	0				0		2
Failure to provide an accessible route into and thru the covered unit	0	0	1	1				0		2
Failure to make reasonable accommodation	2	2	1	2	0	5	4	1	1	18
Discriminatory advertisement - rental	1		0			8	0	4		13
False denial or representation of availability									1	1
Discriminatory financing (includes real estate transactions)	0		0	0	0			1		1
Refusing to provide insurance	0				1					1
Otherwise deny or make housing available	0			0			1	0	0	1
Refusing to provide municipal services or property				1						1
Total Issues	26	14	24	16	14	29	15	17	10	165
Total Complaints	23	14	20	12	11	22	10	15	5	132

Table 44.E.3
Fair Housing Complaints by Closure Status
 44. Remainder of Summit County
 2004–2012 HUD Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
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Administrative Closure	2	1	1	2	1	6	3	3	0	19
Cause (FHAP)	2	0	3	3	0	5	0	5		18
Charged (HUD)					1	0				1
Conciliated / Settled	12	6	10	5	3	6	4	4	1	51
No Cause	7	7	6	2	6	5	3	3		39
Open							0	0	4	4
Total Complaints	23	14	20	12	11	22	10	15	5	132

HUD Complaints Found With Cause

Table 44.E.4
Fair Housing Complaints Found With Cause by Basis
44. Remainder of Summit County
2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color			0	1						1
Disability	4	4	8	5	1	4	3	1	1	31
Family Status	3	1	3	3	1	5	0	5	0	21
National Origin	0		1	1		1		1		4
Race	6	2	2	1	2	5	1	1	0	20
Sex	1	0	0		0	3	0	1		5
Total Bases	14	7	14	11	4	18	4	9	1	82
Total Complaints	14	6	13	8	4	11	4	9	1	70

Table 44.E.5
Fair Housing Complaints Found With Cause by Issue
44. Remainder of Summit County
2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Discriminatory advertisement - rental	0					3	0	4		7
Discriminatory refusal to rent and negotiate for rental	0	1		2	1	1				5
Non-compliance with design and construction requirements (handicap)	1		1	2						4
Discriminatory advertising, statements, and notices	0	0		0	0	2	0	1	0	3
False denial or representation of availability - rental	0		0		1	2	0			3
Other discriminatory acts	1	0	1	0		0	0	0	0	2
Discriminatory acts under Section 818 (coercion, etc.)			1			0	0	1		2
Failure to provide accessible and usable public and common user areas	1		1	0						2
Failure to provide an accessible route into and thru the covered unit	0	0	1	1						2
Discrimination in terms, conditions or privileges relating to rental	4	1	1	2	1	2	2	2		15
Failure to make reasonable accommodation	2	2	1	2	0	4	2	0	1	14
Discriminatory refusal to rent	2	1	3	2	1	0	2	1	0	12
Discriminatory terms, conditions, privileges, or services and facilities	4	1	3	0	0	2	0	1	0	11
Discriminatory refusal to negotiate for rental	0		0			1	0			1
Discriminatory advertising - sale	1									1
Discrimination in the terms or conditions for making loans	0							1		1
Discrimination in services and facilities relating to rental	0		1	0	0		0			1
Refusing to provide insurance					1					1
Total Issues	16	6	14	11	5	17	6	11	1	87
Total Complaints	14	6	13	8	4	11	4	9	1	70

OHIO CIVIL RIGHTS COMMISSION COMPLAINTS

Table 44.E.6
Fair Housing Complaints by Basis
 44. Remainder of Summit County
 2004–2012 OCRC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color	2	2	0	2	1	2	0	0	0	9
Disability	4	1	5	10	2	3	2	5	1	33
Family Status	6	1	2	3	5	2	2	2	0	23
Gender	3	1	3	2	2	2	1	2	1	17
National Origin	0	0	0	1	0	0	1	1	1	4
Race	6	7	8	7	10	4	4	3	1	55
Religion	0	1	0	1	0	0	0	0		2
Retaliation	0	0	5	3	4	4	2	6	1	25
Other	0		2						0	2
Total Bases	21	13	25	29	23	23	12	19	5	170
Total Complaints	16	10	18	18	14	15	9	14	3	117

Table 44.E.7
Fair Housing Complaints by Issue
 44. Remainder of Summit County
 2004–2012 OCRC Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Advertising	0		0			1	0	0		1
Exclusion	1			0	3	1				5
Harassment	1	1	3	0	0	0	2	5	0	12
Intimidation	0	0	2	1	1	3	2	5	2	16
Other	8	5	8	7	6	5	4	2	3	48
Reasonable Accommodation	1	1	2	4		0	2	2	1	13
Sexual Harassment	2	1	0	0	1		0			4
Terms and Conditions	6	7	14	10	8	10	5	5	1	66
Total Issues	19	15	29	22	19	20	15	19	7	165
Total Complaints	16	10	18	18	14	15	9	14	3	117

Table 44.E.8
Fair Housing Complaints by Closure Status
 44. Remainder of Summit County
 2004–2012 OCRC Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Administrative Closure	0	0	1		0	3	2	1		7
CP Failed to Cooperate	0	0	0	4	0		0	1	0	5
CP Withdrawal – No Benefit	1	1	1	0	5	1	0	2	0	11
No Cause Finding Issued	4	7	6	4	7	6	1	6		41
No Jurisdiction	0	0	1		0	0	0	0	1	2
Settlement With Benefits	5	2	5	5	1	3	6	1	1	29
Successful Conciliation	0	0	0	4			0			4
Withdrawal With Benefits	6	0	4	1	1	2	0	3	1	18
Total Complaints	16	10	18	18	14	15	9	14	3	117

FAIR HOUSING CONTACT SERVICE COMPLAINTS

Table 44.E.9
Fair Housing Complaints by Basis
 44. Remainder of Summit County
 2004–2012 FHCS Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Advertising	2									2

Ancestry				0	1					1
Color	0	4	1	1	4			1	0	11
Disability	6	2	8	8	7	7	9	8	6	61
Familial Status	6	2	8	2	10	4	7	4	0	43
Harassment				1	0	0	0			1
National Origin			3	2	1	0	2	1	0	9
Race	7	6	10	2	13	10	6	4	3	61
Retaliation	0		2	1	4	8	1	6	0	22
Sex	2	0	1	2	2	6	3	1	4	21
Other				0	1	0		0		1
None			1							1
Total Bases	23	14	34	19	43	35	28	25	13	234
Total Complaints	17	9	27	13	31	20	23	21	11	172

Table 44.E.10
Fair Housing Complaints by Closure Status
 44. Remainder of Summit County
 2004–2012 FHCS Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Closed			8	6	5	7	1	1	1	29
Dismissed			1	0	0	2		1		4
Elected not to pursue						2	3	0	1	6
Independently resolved						1	1	3	0	5
Inquiry			4	2	17	0	0	0	2	25
Lack of jurisdiction					3					3
No contact							7	6	1	14
No probable cause			5	1	3	2	0	0		11
Pending			3	3	0		1	0	0	7
Probable cause			0	0		2	2	3		7
Reasonable accommodation granted				0			0	0	1	1
Reasonable modification granted							0	0	1	1
Referred for other assistance							0	0	3	3
Settled			6	1	2	4	8	5	1	27
Settled through OCRC					1	0			0	1
Withdrawal of Charge					0			2	0	2
Missing	17	9		0	0					26
Total Complaints	17	9	27	13	31	20	23	21	11	172

THE HOUSING RESEARCH AND ADVOCACY CENTER COMPLAINTS

Table 44.E.11
Fair Housing Complaints by Basis

44 Remainder of Summit County
2004–2012 HRAC Data

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

Table 44.E.12
Fair Housing Complaints by Issue

44 Remainder of Summit County
2004–2012 HRAC Data

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

Table 44.E.13
Fair Housing Complaints by Action Taken

44 Remainder of Summit County
2004–2012 HRAC Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Referred to OCRC				1				1		2
Total	0	0	0	1	0	0	0	1	0	2
Total Complaints				1		0		1		2

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 44.F.1
Primary Role of Respondent
44. Remainder of Summit County
2012–2013 Fair Housing Survey for Housing
Stakeholders Data

Primary Role	Total
Local Government	1
Property Management	1
Total	2

FEDERAL, STATE, AND LOCAL LAWS

Table 44.F.2
Familiarity with Fair Housing Laws

44. Remainder of Summit County
2012–2013 Fair Housing Survey
for Housing Stakeholders Data

Familiarity	Total
Not Familiar	0
Somewhat Familiar	1
Very Familiar	1
Missing	0
Total	2

Table 44.F.3
Perceptions About Fair Housing Laws

44. Remainder of Summit 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	0	0	2
Are fair housing laws difficult to understand or follow?	0	2	0	0	2
Do you think fair housing laws should be changed?	1	1	0	0	2
Do you think fair housing laws are adequately enforced?	1	0	0	1	2

Table 44.F.4
Fair Housing Activities

44. Remainder of Summit County
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?		1	0	0	1	2
Have you participated in fair housing training?		1	0	0	1	2
Are you aware of any fair housing testing?		1		0	1	2
Testing and education	Too Little	Right Amount	Too Much	Don't Know	Missing	Total
Is there sufficient outreach and education activity?	1	0	0	0	1	2
Is there sufficient testing?	1	0		0	1	2

Table 44.F.5
Protected Classes

44. Remainder of Summit County
2012–2013 Fair Housing Survey
for Housing Stakeholders Data

Protected Class	Total
Family Status	1
Religion	1
Sexual Orientation	1
Age	1
Other	1
Total	5

Table 44.F.6

Fair Housing Violation Referrals
 44. Remainder of Summit County
 2012–2013 Fair Housing Survey for Housing
 Stakeholders Data

Referral	Total
Fair Housing Advocates Association	1
Fair Housing Contact Service	1
Total	2

LOCAL FAIR HOUSING

Table 44.F.7

Local Fair Housing

44. Remainder of Summit 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	0	0	2
Are there any specific geographic areas that have fair housing problems?	0	1	1	0	2
Are there any specific groups in that face housing discrimination?	0	1	1	0	2

FAIR HOUSING IN THE PRIVATE SECTOR

Table 44.F.8

Barriers to Fair Housing in the Private Sector

44. Remainder of Summit 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	0	0	2
The real estate industry?	1	1	0	0	2
The mortgage and home lending industry?	1	1	0	0	2
The housing construction or accessible housing design fields?	0	2	0	0	2
The home insurance industry?	0	2	0	0	2
The home appraisal industry?	0	2	0	0	2
Any other housing services?	0	2	0	0	2

FAIR HOUSING IN THE PUBLIC SECTOR

Table 44.F.9

Barriers to Fair Housing in the Public Sector

44. Remainder of Summit 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	2	0	0	2
Zoning laws?	0	2	0	0	2
Occupancy standards or health and safety codes?	0	2	0	0	2
Property tax policies?	0	1	1	0	2
Permitting process?	0	1	1	0	2
Housing construction standards?	0	2	0	0	2
Neighborhood or community development policies?	0	1	1	0	2
Limited access to government services, such as employment services?	0	2	0	0	2
Public administrative actions or regulations?	0	1	1	0	2

NARRATIVE COMMENTS

Federal, State, and Local Laws

Table 44.F.10

How did you become aware of fair housing laws?

44. Remainder of Summit County
2013 Fair Housing Survey Data

Comments:
I worked on the update to the County of Summit Analysis of Impediments to Fair Housing Choice

Table 44.F.11

How should fair housing laws be changed?

44. Remainder of Summit County
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.

Fair Housing in the Private Sector

Table 44.F.12

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

44. Remainder of Summit County
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 44.F.13

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

44. Remainder of Summit County
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 44.F.14

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

44. Remainder of Summit County
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.

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 Summit County that received and completed the survey.⁷⁰

Table 44.G.1
Housing Development
 44. Remainder of Summit 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	3	5	16
Guidelines that encourage development affordable housing units?	0	8	3	5	16
Any potential barriers to the development of low- to moderate- income housing?	4	5	3	4	16
Guidelines that allow the development of mixed use housing?	6	4	1	5	16
Any potential barriers to the development of mixed use housing?	6	5	0	5	16
Occupancy Standards					
A definition for the term "family"?	5	3	3	5	16
Residential occupancy standards or limits?	2	7	2	5	16
Special Needs Housing					
A definition for the term "disability"?	2	4	4	6	16
Development standards for making housing accessible to persons with disabilities?	0	7	3	6	16
A process by which persons with disabilities can request modification to the jurisdiction's policies?	5	1	4	6	16
Standards for the development of senior housing?	1	6	3	6	16
Guidelines that distinguish senior citizen housing from other residential uses?	1	6	3	6	16
Guidelines for developing housing for any other special needs populations?	1	6	3	6	16
Fair Housing Policies					
A fair housing ordinance, policy, or regulation?	1	4	5	6	16
Policies or practices for "affirmatively furthering fair housing"?	2	4	4	6	16

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 Summit 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

⁷⁰ For areas with both nonentitlement and entitlement communities, the results of the nonentitlement community government official survey and the entitlement community interviews were summed.

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 Remainder of Summit 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 in the remainder of Summit County.

Results of the Fair Housing Surveys indicate that a number of local communities in the remainder of Summit County lack or do not have sufficient policies or practices that adequately address the duty to affirmatively further fair housing.

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 Summit 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 in the remainder of Summit County. 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 44.H.1
Impediments Matrix
 44. Remainder of Summit 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 ⁷¹		
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	Lack of inclusionary policies							X		X	All	M

⁷¹ 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.

45. TRUMBULL COUNTY

A. CENSUS BUREAU DATA

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

Table 45.A.1

Population by Age

45. Trumbull County

2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Under 5	13,777	6.1%	11,646	5.5%	-15.5%
5 to 19	46,578	20.7%	40,057	19.0%	-14.0%
20 to 24	11,894	5.3%	11,548	5.5%	-2.9%
25 to 34	27,429	12.2%	22,343	10.6%	-18.5%
35 to 54	67,273	29.9%	57,929	27.5%	-13.9%
55 to 64	22,727	10.1%	30,172	14.3%	32.8%
65 or Older	35,438	15.7%	36,617	17.4%	3.3%
Total	225,116	100.0%	210,312	100.0%	-6.6%

Table 45.A.2

Elderly Population by Age

45. Trumbull County

2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
65 to 66	3,777	10.7%	4,372	11.9%	15.8%
67 to 69	5,492	15.5%	6,198	16.9%	12.9%
70 to 74	9,146	25.8%	8,238	22.5%	-9.9%
75 to 79	7,985	22.5%	6,746	18.4%	-15.5%
80 to 84	5,255	14.8%	5,735	15.7%	9.1%
85 or Older	3,783	10.7%	5,328	14.6%	40.8%
Total	35,438	100.0%	36,617	100.0%	3.3%

Table 45.A.3

Population by Race and Ethnicity

45. Trumbull County

2000 & 2010 Census SF1 Data

Race	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
White	203,084	90.2%	187,113	89.0%	-7.9%
Black	17,778	7.9%	17,417	8.3%	-2.0%
American Indian	333	.1%	360	.2%	8.1%
Asian	1,014	.5%	984	.5%	-3.0%
Native Hawaiian/ Pacific Islander	34	.0%	41	.0%	20.6%
Other	472	.2%	671	.3%	42.2%
Two or More Races	2,401	1.1%	3,726	1.8%	55.2%
Total	225,116	100.0%	210,312	100.0%	-6.6%
Non-Hispanic	223,322	99.2	207,511	98.7%	-7.1%
Hispanic	1,794	.8%	2,801	1.3%	56.1%

Table 45.A.4
Disability by Age
 45. Trumbull 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%	23	.4%	23	.2%
5 to 17	1,266	7.0%	734	4.2%	2,000	5.6%
18 to 34	1,863	10.1%	1,251	6.6%	3,114	8.3%
35 to 64	6,298	14.7%	6,250	13.8%	12,548	14.3%
65 to 74	2,321	27.4%	2,324	24.3%	4,645	25.7%
75 or Older	3,031	47.8%	5,029	50.2%	8,060	49.3%
Total	14,779	14.7%	15,611	14.6%	30,390	14.7%

Table 45.A.5
Employment Status by Disability and Type: Age 18 to 64
 45. Trumbull County
 2010 Three-Year ACS Data

Disability Status	Population
Employed:	83,183
With a disability:	4,194
With a hearing difficulty	992
With a vision difficulty	395
With a cognitive difficulty	1,572
With an ambulatory difficulty	1,870
With a self-care difficulty	425
With an independent living difficulty	743
No disability	78,989
Unemployed:	8,939
With a disability:	1,196
With a hearing difficulty	297
With a vision difficulty	128
With a cognitive difficulty	604
With an ambulatory difficulty	333
With a self-care difficulty	144
With an independent living difficulty	321
No disability	7,743
Not in labor force:	33,393
With a disability:	10,272
With a hearing difficulty	1,295
With a vision difficulty	955
With a cognitive difficulty	4,912
With an ambulatory difficulty	6,448
With a self-care difficulty	2,493
With an independent living difficulty	4,377
No disability	23,121
Total	125,515

Table 45.A.6
Households by Income

45. Trumbull 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	14,303	16.1%	13,640	15.8%
\$15,000 to \$19,999	6,659	7.5%	5,531	6.4%
\$20,000 to \$24,999	6,534	7.3%	5,836	6.7%
\$25,000 to \$34,999	12,632	14.2%	10,578	12.2%
\$35,000 to \$49,999	16,183	18.2%	14,798	17.1%
\$50,000 to \$74,999	17,888	20.1%	17,155	19.8%
\$75,000 to \$99,999	8,279	9.3%	9,642	11.2%
\$100,000 or More	6,503	7.3%	9,283	10.7%
Total	88,981	100.0%	86,463	100.0%

Table 45.A.7
Poverty by Age

45. Trumbull 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	3,286	14.4%	4,015	12.5%
6 to 17	5,208	22.9%	7,891	24.7%
18 to 64	11,751	51.6%	17,342	54.2%
65 or Older	2,543	11.2%	2,762	8.6%
Total	22,788	100.0%	32,010	100.0%
Poverty Rate	10.3%	.	15.4%	.

Table 45.A.8
Households by Year Home Built

45. Trumbull 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	18,565	20.9%	16,326	18.9%
1940 to 1949	9,054	10.2%	7,903	9.1%
1950 to 1959	16,455	18.5%	16,493	19.1%
1960 to 1969	13,801	15.5%	12,808	14.8%
1970 to 1979	16,749	18.8%	15,366	17.8%
1980 to 1989	6,586	7.4%	6,074	7.0%
1990 to 1999	7,810	8.8%	7,231	8.4%
2000 to 2004	.	.	3,310	3.8%
2005 or Later	.	.	952	1.1%
Total	89,020	100.0%	86,463	100.0%

Table 45.A.9**Housing Units by Type**

45. Trumbull 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	72,702	76.4%	75,061	77.9%
Duplex	4,648	4.9%	4,383	4.5%
Tri- or Four-Plex	3,280	3.4%	3,251	3.4%
Apartment	9,154	9.6%	8,851	9.2%
Mobile Home	5,301	5.6%	4,817	5.0%
Boat, RV, Van, Etc.	32	.0%	0	.0%
Total	95,117	100.0%	96,363	100.0%

Table 45.A.10**Housing Units by Tenure**

45. Trumbull County

2000 & 2010 Census SF1 Data

Tenure	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
Occupied Housing Units	89,020	93.6%	86,011	89.4%	-3.4%
Owner-Occupied	66,105	74.3%	62,396	72.5%	-5.6%
Renter-Occupied	22,915	25.7%	23,615	27.5%	3.1%
Vacant Housing Units	6,097	6.4%	10,152	10.6%	66.5%
Total Housing Units	95,117	100.0%	96,163	100.0%	1.1%

Table 45.A.11**Disposition of Vacant Housing Units**

45. Trumbull County

2000 & 2010 Census SF1 Data

Disposition	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
For Rent	2,688	44.1%	3,326	32.8%	23.7%
For Sale	1,109	18.2%	1,692	16.7%	52.6%
Rented or Sold, Not Occupied	1,194	19.6%	550	5.4%	-53.9%
For Seasonal, Recreational, or Occasional Use	392	6.4%	499	4.9%	27.3%
For Migrant Workers	1	0.0%	0	.0%	-100.0%
Other Vacant	713	11.7%	4,085	40.2%	472.9%
Total	6,097	100.0%	10,152	100.0%	66.5%

Table 45.A.12**Households by Household Size**

45. Trumbull County

2000 & 2010 Census SF1 Data

Size	2000 Census		2010 Census		% Change 00-10
	Households	% of Total	Households	% of Total	
One Person	23,922	26.9%	25,092	29.2%	4.9%
Two Persons	30,152	33.9%	30,172	35.1%	.1%
Three Persons	15,075	16.9%	13,731	16.0%	-8.9%
Four Persons	12,102	13.6%	9,958	11.6%	-17.7%
Five Persons	5,159	5.8%	4,365	5.1%	-15.4%
Six Persons	1,672	1.9%	1,624	1.9%	-2.9%
Seven Persons or More	938	1.1%	1,069	1.2%	14.0%
Total	89,020	100.0%	86,011	100.0%	-3.4%

Table 45.A.13
Household Type by Tenure
 45. Trumbull County
 2000 & 2010 Census SF1 Data

Household Type	2000 Census		2010 Census		% Change 00–10
	Households	% of Total	Households	% of Total	
Family Households	61,648	69.3%	56,874	66.1%	-7.7%
Married-Couple Family	47,064	76.3%	40,744	71.6%	-13.4%
Owner-Occupied	41,444	88.1%	35,978	88.3%	-13.2%
Renter-Occupied	5,620	11.9%	4,766	11.7%	-15.2%
Other Family	14,584	23.7%	16,130	28.4%	10.6%
Male Householder, No Spouse	3,477	23.8%	4,338	26.9%	24.8%
Owner-Occupied	2,310	66.4%	2,872	66.2%	24.3%
Renter-Occupied	1,167	33.6%	1,466	33.8%	25.6%
Female Householder, No Spouse	11,107	76.2%	11,792	73.1%	6.2%
Owner-Occupied	6,221	56.0%	6,149	52.1%	-1.2%
Renter-Occupied	4,886	44.0%	5,643	47.9%	15.5%
Non-Family Households	27,372	30.7%	29,137	33.9%	6.4%
Owner-Occupied	16,130	58.9%	17,397	59.7%	7.9%
Renter-Occupied	11,242	41.1%	11,740	40.3%	4.4%
Total	89,020	100.0%	86,011	100.0%	-3.4%

Table 45.A.14
Group Quarters Population
 45. Trumbull 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	1,729	45.1%	1,756	51.1%	1.6%
Juvenile Facilities	.	.	39	1.1%	.
Nursing Homes	2,048	53.4%	1,641	47.8%	-19.9%
Other Institutions	56	1.5%	0	.0%	-100.0%
Total	3,833	100.0%	3,436	100.0%	-10.4%
Noninstitutionalized					
College Dormitories	0	.0%	0	.0%	%
Military Quarters	0	.0%	0	.0%	%
Other Noninstitutional	255	100.0%	385	100.0%	51.0%
Total	255	6.2%	385	10.1%	51.0%
Total Group Quarters Population	4,088	100.0%	3,821	100.0%	-6.5%

Table 45.A.15
Overcrowding and Severe Overcrowding
 45. Trumbull 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	65,431	99.0%	549	.8%	124	.2%	66,104
2010 ACS	63,942	99.1%	549	.9%	43	.1%	64,534
Renter							
2000 Census	22,195	96.9%	605	2.6%	116	.5%	22,916
2010 ACS	21,530	98.2%	323	1.5%	76	.3%	21,929
Total							
2000 Census	87,626	98.4%	1,154	1.3%	240	.3%	89,020
2010 ACS	85,472	98.9%	872	1.0%	119	.1%	86,463

Table 45.A.16
Households with Incomplete Plumbing Facilities
 45. Trumbull County
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Plumbing Facilities	88,710	86,196
Lacking Complete Plumbing Facilities	310	267
Total Households	89,020	86,463
Percent Lacking	.3%	.3%

Table 45.A.17
Households with Incomplete Kitchen Facilities
 45. Trumbull County
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Kitchen Facilities	88,576	85,699
Lacking Complete Kitchen Facilities	444	764
Total Households	89,020	86,463
Percent Lacking	.5%	.9%

Table 45.A.18
Cost Burden and Severe Cost Burden by Tenure
 45. Trumbull 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	27,318	79.6%	4,439	12.9%	2,445	7.1%	113	.3%	34,315
2010 ACS	26,723	68.8%	7,181	18.5%	4,755	12.2%	182	.5%	38,841
Owner Without a Mortgage									
2000 Census	20,223	91.1%	1,024	4.6%	608	2.7%	335	1.5%	22,190
2010 ACS	21,780	84.8%	2,472	9.6%	1,244	4.8%	197	.8%	25,693
Renter									
2000 Census	13,377	59.2%	3,846	17.0%	3,436	15.2%	1,929	8.5%	22,588
2010 ACS	10,252	46.8%	4,766	21.7%	4,842	22.1%	2,069	9.4%	21,929
Total									
2000 Census	60,918	77.0%	9,309	11.8%	6,489	8.2%	2,377	3.0%	79,093
2010 ACS	58,755	68.0%	14,419	16.7%	10,841	12.5%	2,448	2.8%	86,463

Table 45.A.19
Median Housing Costs
 45. Trumbull County
 2000 Census SF3 & 2010 Five-Year ACS Data

Housing Cost	2000 Census	2010 ACS
Median Contract Rent	\$381	\$451
Median Home Value	\$85,500	\$102,500

B. BEA DATA

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

Table 45.B.1
Employment by Industry
 45. Trumbull County
 Select Years 2001–2010 BEA Data

NAICS Categories	2001	2005	2006	2007	2008	2009	2010	% Change 01–10
Farm employment	1,135	997	983	982	939	941	938	-17.4%
Forestry, fishing, related activities, and other	125	170	148	157	171	166	171	36.8%
Mining	529	514	534	571	749	730	800	51.2%
Utilities	(D) ⁷²	148	192	210	199	183	169	.
Construction	4,703	5,104	4,986	5,083	4,892	4,412	4,370	-7.1%
Manufacturing	27,226	21,749	20,966	17,257	16,469	11,219	13,065	-52.0%
Wholesale trade	(D)	2,812	2,802	2,693	2,725	2,432	2,365	.
Retail trade	14,243	14,081	13,451	13,319	12,581	12,117	11,909	-16.4%
Transportation and warehousing	4,081	3,611	3,729	3,687	3,491	3,231	3,311	-18.9%
Information	864	706	1,011	933	849	813	820	-5.1%
Finance and insurance	2,810	2,913	2,900	3,027	3,037	3,080	3,117	10.9%
Real estate and rental and leasing	3,158	3,489	3,495	3,433	3,459	3,415	3,319	5.1%
Professional and technical services	3,621	3,296	2,992	3,083	2,907	2,887	2,937	-18.9%
Management of companies and enterprises	701	604	688	672	749	754	916	30.7%
Administrative and waste services	4,738	5,829	5,817	5,822	5,761	5,549	5,727	20.9%
Educational services	1,020	1,144	1,078	928	913	944	999	-2.1%
Health care and social assistance	11,415	13,566	13,936	13,612	13,447	13,181	13,065	14.5%
Arts, entertainment, and recreation	1,474	1,681	1,608	1,589	1,523	1,494	1,446	-1.9%
Accommodation and food services	7,387	7,214	7,397	7,348	7,165	6,780	6,720	-9.0%
Other services, except public administration	6,164	5,726	5,802	5,832	5,564	5,362	5,242	-15.0%
Government and government enterprises	12,111	11,386	11,003	10,846	10,651	10,533	10,511	-13.2%
Total	110,687	106,740	105,518	101,084	98,241	90,223	91,917	-17.0%

⁷² (D): These data are not shown to avoid disclosure of confidential information, but estimates are included in the totals.

Table 45.B.2
Real Earnings by Industry

45. Trumbull County
 Select Years 2001–2010 BEA Data, Real 2011 Dollars

NAICS Categories	2001	2005	2006	2007	2008	2009	2010	% Change 00–10
Farm earnings	2,551	6,324	4,235	4,893	5,412	5,662	5,214	104.4%
Forestry, fishing, related activities, and other	4,524	3,917	3,079	3,533	2,774	2,457	2,441	-46.0%
Mining	5,903	12,922	12,039	10,799	8,669	3,011	3,073	-47.9%
Utilities	(D) ⁷³	15,079	18,471	19,341	21,192	19,023	16,966	.
Construction	204,685	197,414	195,231	186,192	176,560	152,418	160,792	-21.4%
Manufacturing	2,147,525	1,945,661	2,045,548	1,760,149	1,413,818	938,852	1,119,631	-47.9%
Wholesale trade	(D)	148,668	147,740	147,410	148,597	124,077	126,823	.
Retail trade	366,884	358,468	344,995	340,874	330,428	319,564	319,964	-12.8%
Transportation and warehousing	198,726	168,062	181,255	171,538	161,942	141,612	147,132	-26.0%
Information	48,232	35,538	46,938	46,111	42,926	35,974	36,722	-23.9%
Finance and insurance	138,253	135,907	133,127	134,141	111,246	101,754	98,867	-28.5%
Real estate and rental and leasing	64,084	57,067	55,357	49,602	52,927	54,504	50,703	-20.9%
Professional and technical services	124,855	104,538	100,582	101,485	96,040	93,019	95,665	-23.4%
Management of companies and enterprises	50,631	46,738	53,152	50,509	54,432	54,182	67,981	34.3%
Administrative and waste services	118,549	142,943	139,964	138,591	141,950	138,344	140,364	18.4%
Educational services	16,967	20,226	20,806	18,641	17,063	17,960	19,599	15.5%
Health care and social assistance	472,165	613,746	660,874	623,396	602,244	591,523	570,449	20.8%
Arts, entertainment, and recreation	21,395	20,332	19,085	18,607	16,033	15,629	14,472	-32.4%
Accommodation and food services	125,255	138,073	137,217	139,223	143,167	140,475	152,982	22.1%
Other services, except public administration	195,439	183,484	177,642	172,664	147,847	140,779	143,986	-26.3%
Government and government enterprises	579,019	599,919	576,984	566,147	562,774	579,715	583,141	.7%
Total	5,048,542	4,955,025	5,074,322	4,703,844	4,258,042	3,670,536	3,876,967	-23.2%

⁷³ (D): These data are not shown to avoid disclosure of confidential information, but estimates are included in the totals.

Table 45.B.3
Real Earnings Per Job by Industry
 45. Trumbull 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	2,248	6,343	4,309	4,983	5,764	6,017	5,559	147.3%
Forestry, fishing, related activities, and other	36,195	23,039	20,805	22,505	16,222	14,799	14,275	-60.6%
Mining	11,158	25,140	22,545	18,912	11,575	4,125	3,842	-65.6%
Utilities	(D) ⁷⁴	101,887	96,201	92,101	106,495	103,954	100,388	.
Construction	43,522	38,678	39,156	36,630	36,092	34,546	36,795	-15.5%
Manufacturing	78,878	89,460	97,565	101,996	85,847	83,684	85,697	8.6%
Wholesale trade	(D)	52,869	52,727	54,738	54,531	51,019	53,625	.
Retail trade	25,759	25,458	25,648	25,593	26,264	26,373	26,867	4.3%
Transportation and warehousing	48,695	46,542	48,607	46,525	46,388	43,829	44,437	-8.7%
Information	55,824	50,336	46,428	49,422	50,560	44,248	44,783	-19.8%
Finance and insurance	49,200	46,655	45,906	44,315	36,630	33,037	31,719	-35.5%
Real estate and rental and leasing	20,293	16,356	15,839	14,448	15,301	15,960	15,276	-24.7%
Professional and technical services	34,481	31,717	33,617	32,917	33,037	32,220	32,572	-5.5%
Management of companies and enterprises	72,227	77,380	77,255	75,162	72,672	71,859	74,215	2.8%
Administrative and waste services	25,021	24,523	24,061	23,805	24,640	24,931	24,509	-2.0%
Educational services	16,634	17,680	19,301	20,087	18,689	19,026	19,618	17.9%
Health care and social assistance	41,364	45,241	47,422	45,798	44,786	44,877	43,662	5.6%
Arts, entertainment, and recreation	14,515	12,095	11,869	11,710	10,527	10,461	10,009	-31.0%
Accommodation and food services	16,956	19,140	18,550	18,947	19,981	20,719	22,765	34.3%
Other services, except public administration	31,707	32,044	30,617	29,606	26,572	26,255	27,468	-13.4%
Government and government enterprises	47,809	52,689	52,439	52,199	52,838	55,038	55,479	16.0%
Average	45,611	46,421	48,089	46,534	43,343	40,682	42,179	-7.52%

⁷⁴ (D): These data are not shown to avoid disclosure of confidential information, but estimates are included in the totals.

Table 45.B.4
Total Employment and Real Personal Income
 45. Trumbull 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	4,021,033	269,117	-43,836	462,054	283,322	4,453,456	19,305	99,393	40,458
1970	3,805,433	251,921	37,178	470,477	326,487	4,387,655	18,827	96,490	39,437
1971	4,107,622	279,712	-34,668	478,136	364,499	4,635,877	19,696	99,786	41,163
1972	4,516,996	326,658	-82,143	483,170	393,870	4,985,235	20,178	103,330	43,712
1973	5,115,472	432,513	-172,991	496,474	425,623	5,432,065	22,901	109,441	46,741
1974	4,861,141	425,608	-90,899	514,513	489,321	5,348,467	22,255	110,511	43,989
1975	4,446,120	380,580	-64,616	516,629	602,672	5,120,225	20,991	104,145	42,691
1976	4,788,450	410,160	-138,405	526,279	653,788	5,419,951	22,590	105,732	45,288
1977	5,076,225	436,105	-202,104	555,482	592,761	5,586,258	23,096	107,248	47,333
1978	5,421,585	485,040	-329,062	595,028	594,075	5,796,587	23,645	111,324	48,700
1979	5,519,160	512,154	-381,092	618,275	629,136	5,873,326	24,340	113,825	48,489
1980	5,173,781	471,490	-384,331	740,901	781,285	5,840,147	24,161	108,897	47,511
1981	5,182,773	508,515	-423,465	845,428	750,260	5,846,480	24,307	108,417	47,804
1982	4,275,361	423,863	-187,707	905,978	883,529	5,453,298	22,803	96,143	44,468
1983	4,621,177	473,457	-364,174	925,871	866,677	5,576,094	23,533	98,154	47,081
1984	5,037,137	530,779	-417,905	1,045,623	829,684	5,963,760	25,378	102,833	48,983
1985	5,098,420	549,108	-395,115	1,051,564	853,743	6,059,503	25,943	103,951	49,047
1986	4,961,604	549,480	-292,884	1,054,743	893,612	6,067,595	26,273	106,328	46,663
1987	4,823,230	537,606	-232,208	1,024,618	908,439	5,986,473	26,149	107,977	44,668
1988	5,123,332	589,473	-244,621	1,049,378	919,347	6,257,963	27,335	110,124	46,524
1989	5,243,974	606,468	-247,878	1,118,231	959,099	6,466,957	28,311	110,471	47,469
1990	4,884,745	583,787	-122,025	1,127,017	1,071,142	6,377,092	27,986	108,507	45,018
1991	4,873,549	596,513	-197,444	1,146,438	1,079,119	6,305,148	27,560	108,212	45,037
1992	5,352,194	614,202	-517,876	1,079,778	1,152,870	6,452,764	28,120	109,247	48,992
1993	5,521,383	651,230	-603,957	1,052,846	1,170,461	6,489,502	28,254	111,578	49,484
1994	6,217,122	676,954	-934,163	1,087,435	1,192,999	6,886,438	29,961	113,002	55,017
1995	5,902,045	682,993	-695,034	1,092,345	1,227,882	6,844,245	29,868	118,038	50,002
1996	5,429,441	664,620	-293,769	1,192,134	1,255,335	6,918,522	30,225	118,437	45,843
1997	5,438,870	641,014	-293,780	1,252,127	1,268,686	7,024,889	30,789	118,771	45,793
1998	5,327,313	600,217	-191,944	1,333,312	1,281,653	7,150,117	31,464	115,195	46,246
1999	5,395,524	607,433	-154,098	1,318,387	1,287,016	7,239,395	32,021	115,412	46,751
2000	5,304,862	576,864	-129,601	1,274,564	1,336,930	7,209,891	32,056	115,009	46,126
2001	5,048,542	574,446	-85,207	1,221,572	1,425,716	7,036,177	31,413	110,687	45,611
2002	5,066,166	557,239	-89,848	1,142,133	1,474,834	7,036,046	31,624	108,694	46,609
2003	5,300,844	570,839	-170,222	1,107,020	1,510,663	7,177,467	32,494	107,019	49,532
2004	5,144,508	585,436	-78,524	1,031,652	1,530,194	7,042,394	32,078	106,749	48,192
2005	4,955,025	571,267	-7,493	943,114	1,567,854	6,887,233	31,604	106,740	46,421
2006	5,074,322	592,338	-53,034	977,867	1,590,911	6,997,728	32,370	105,518	48,089
2007	4,703,844	548,552	10,117	1,129,574	1,631,621	6,926,603	32,322	101,084	46,534
2008	4,258,042	512,796	145,577	1,205,257	1,741,549	6,837,629	32,223	98,241	43,343
2009	3,670,536	452,724	309,411	964,747	1,963,625	6,455,595	30,553	90,223	40,682
2010	3,876,967	475,173	200,790	964,680	1,990,609	6,557,873	31,232	91,917	42,179

C. BLS DATA

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

Table 45.C.1
Labor Force Statistics
 45. Trumbull County
 1990–2011 BLS Data

Year	Labor Force	Employment	Unemployment	Unemployment Rate	Statewide Unemployment Rate
1990	110,074	101,751	8,323	7.6%	5.7%
1991	110,558	101,837	8,721	7.9%	6.6%
1992	112,891	101,567	11,324	10.0%	7.4%
1993	111,445	101,783	9,662	8.7%	6.7%
1994	111,807	103,387	8,420	7.5%	5.6%
1995	112,937	105,512	7,425	6.6%	4.9%
1996	112,041	105,001	7,040	6.3%	5.0%
1997	112,534	106,235	6,299	5.6%	4.6%
1998	113,028	106,256	6,772	6.0%	4.3%
1999	111,976	106,012	5,964	5.3%	4.3%
2000	107,559	102,180	5,379	5.0%	4.0%
2001	106,885	100,272	6,613	6.2%	4.4%
2002	106,374	99,057	7,317	6.9%	5.7%
2003	106,513	98,522	7,991	7.5%	6.2%
2004	105,170	97,264	7,906	7.5%	6.1%
2005	105,140	98,086	7,054	6.7%	5.9%
2006	105,460	98,974	6,486	6.2%	5.4%
2007	105,234	98,699	6,535	6.2%	5.6%
2008	104,839	97,019	7,820	7.5%	6.5%
2009	106,487	92,014	14,473	13.6%	10.1%
2010	103,738	91,444	12,294	11.9%	10.0%
2011	101,706	91,948	9,758	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.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 45.D.1
Purpose of Loan by Year
45. Trumbull County
2004–2011 HMDA Data

Purpose	2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	5,070	5,768	5,323	3,842	2,595	2,084	1,948	1,901	28,531
Home Improvement	1,926	2,453	2,065	1,836	1,223	635	570	477	11,185
Refinancing	13,028	13,123	11,176	8,221	5,597	5,717	5,448	4,501	66,811
Total	20,024	21,344	18,564	13,899	9,415	8,436	7,966	6,879	106,527

Table 45.D.2
Occupancy Status for Home Purchase Loan Applications
45. Trumbull County
2004–2011 HMDA Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	Total
Owner-Occupied	4,671	5,231	4,869	3,489	2,412	1,955	1,845	1,754	26,226
Not Owner-Occupied	340	469	424	315	178	126	100	144	2,096
Not Applicable	59	68	30	38	5	3	3	3	209
Total	5,070	5,768	5,323	3,842	2,595	2,084	1,948	1,901	28,531

Table 45.D.3
Owner-Occupied Home Purchase Loan Applications by Loan Type
45. Trumbull County
2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Conventional	3,981	4,654	4,364	2,929	1,301	868	796	736	19,629
FHA - Insured	604	488	437	479	1,004	901	879	835	5,627
VA - Guaranteed	78	83	67	76	82	99	93	105	683
Rural Housing Service or Farm Service Agency	8	6	1	5	25	87	77	78	287
Total	4,671	5,231	4,869	3,489	2,412	1,955	1,845	1,754	26,226

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 45.D.4
Loan Applications by Action Taken
 45. Trumbull County
 2004–2011 HMDA Data

Action	2004	2005	2006	2007	2008	2009	2010	2011	Total
Loan Originated	2,684	2,893	2,593	1,932	1,313	957	973	862	14,207
Application Approved but not Accepted	337	412	320	205	117	69	69	56	1,585
Application Denied	538	685	750	543	367	250	238	227	3,598
Application Withdrawn by Applicant	365	433	296	174	132	97	68	72	1,637
File Closed for Incompleteness	82	82	74	61	20	16	12	22	369
Loan Purchased by the Institution	665	718	833	568	461	566	485	515	4,811
Preapproval Request Denied	0	8	3	6	2	0	0	0	19
Preapproval Approved but not Accepted	0	0	0	0	0	0	0	0	0
Total	4,671	5,231	4,869	3,489	2,412	1,955	1,845	1,754	26,226
Denial Rate	16.7%	19.1%	22.4%	21.9%	21.8%	20.7%	19.7%	20.8%	20.2%

Table 45.D.5
Denial Rates by Gender of Applicant
 45. Trumbull County
 2004–2011 HMDA Data

Year	Male	Female	Not Available	Not Applicable	Average
2004	14.4%	18.9%	43.4%	%	16.7%
2005	16.7%	22.0%	37.7%	%	19.1%
2006	19.5%	26.8%	34.8%	.0%	22.4%
2007	19.3%	26.1%	38.9%	%	21.9%
2008	19.7%	25.8%	24.0%	100.0%	21.8%
2009	19.5%	23.1%	21.6%	%	20.7%
2010	19.3%	19.7%	25.5%	%	19.7%
2011	20.5%	21.5%	22.2%	%	20.8%
Average	18.0%	23.2%	33.5%	33.3%	20.2%

Table 45.D.6
Loan Applications by Selected Action Taken by Gender of Applicant
 45. Trumbull County
 2004–2011 HMDA Data

Gender		2004	2005	2006	2007	2008	2009	2010	2011	Total
Male	Originated	1,902	1,956	1,742	1,367	864	620	653	587	9,691
	Denied	319	391	422	327	212	150	156	151	2,128
	Denial Rate	14.4%	16.7%	19.5%	19.3%	19.7%	19.5%	19.3%	20.5%	18.0%
Female	Originated	713	846	742	507	376	297	282	233	3,996
	Denied	166	239	271	179	131	89	69	64	1,208
	Denial Rate	18.9%	22.0%	26.8%	26.1%	25.8%	23.1%	19.7%	21.5%	23.2%
Not Available	Originated	69	91	107	58	73	40	38	42	518
	Denied	53	55	57	37	23	11	13	12	261
	Denial Rate	43.4%	37.7%	34.8%	38.9%	24.0%	21.6%	25.5%	22.2%	33.5%
Not Applicable	Originated	0	0	2	0	0	0	0	0	2
	Denied	0	0	0	0	1	0	0	0	1
	Denial Rate	%	%	.0%	%	100.0%	%	%	%	33.3%
Total	Originated	2,684	2,893	2,593	1,932	1,313	957	973	862	14,207
	Denied	538	685	750	543	367	250	238	227	3,598
	Denial Rate	16.7%	19.1%	22.4%	21.9%	21.8%	20.7%	19.7%	20.8%	20.2%

Table 45.D.7
Denial Rates by Race/Ethnicity of Applicant
 45. Trumbull County
 2004–2011 HMDA Data

Race/Ethnicity	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	.0%	.0%	28.6%	.0%	.0%	.0%	.0%	66.7%	14.8%
Asian	7.7%	7.1%	25.0%	.0%	33.3%	.0%	18.2%	20.0%	12.8%
Black	22.4%	24.7%	36.5%	27.3%	42.2%	21.3%	22.8%	33.3%	28.6%
White	14.6%	17.4%	19.8%	20.2%	20.2%	20.5%	18.7%	19.5%	18.4%
Not Available	37.9%	30.2%	37.4%	44.6%	31.9%	25.4%	32.0%	30.6%	34.6%
Not Applicable	25.0%	%	.0%	%	100.0%	0%	0%	%	28.6%
Average	16.7%	19.1%	22.4%	21.9%	21.8%	20.7%	19.7%	20.8%	20.2%
Non-Hispanic	14.8%	17.7%	21.1%	20.3%	21.6%	20.1%	18.3%	20.3%	19.0%
Hispanic	18.5%	30.3%	12.5%	34.8%	15.4%	62.5%	40.0%	11.1%	25.9%

Table 45.D.8
Loan Applications by Selected Action Taken by Race/Ethnicity of Applicant
 45. Trumbull County
 2004–2011 HMDA Data

Race		2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Originated	4	3	5	3	3	2	2	1	23
	Denied	0	0	2	0	0	0	0	2	4
	Denial Rate	.0%	.0%	28.6%	.0%	.0%	.0%	.0%	66.7%	14.8%
Asian	Originated	12	13	12	13	2	3	9	4	68
	Denied	1	1	4	0	1	0	2	1	10
	Denial Rate	7.7%	7.1%	25.0%	.0%	33.3%	.0%	18.2%	20.0%	12.8%
Black	Originated	135	146	127	72	37	37	44	24	622
	Denied	39	48	73	27	27	10	13	12	249
	Denial Rate	22.4%	24.7%	36.5%	27.3%	42.2%	21.3%	22.8%	33.3%	28.6%
White	Originated	2,384	2,453	2,251	1,757	1,192	865	867	783	12,552
	Denied	408	516	554	446	301	223	199	190	2,837
	Denial Rate	14.6%	17.4%	19.8%	20.2%	20.2%	20.5%	18.7%	19.5%	18.4%
Not Available	Originated	146	278	196	87	79	50	51	50	937
	Denied	89	120	117	70	37	17	24	22	496
	Denial Rate	37.9%	30.2%	37.4%	44.6%	31.9%	25.4%	32.0%	30.6%	34.6%
Not Applicable	Originated	3	0	2	0	0	0	0	0	5
	Denied	1	0	0	0	1	0	0	0	2
	Denial Rate	37.9%	30.2%	37.4%	44.6%	31.9%	25.4%	32.0%	30.6%	28.6%
Total	Originated	2,684	2,893	2,593	1,932	1,313	957	973	862	14,207
	Denied	538	685	750	543	367	250	238	227	3,598
	Denial Rate	16.7%	19.1%	22.4%	21.9%	21.8%	20.7%	19.7%	20.8%	20.2%
Non-Hispanic	Originated	2,257	2,574	2,375	1,829	1,211	898	914	803	12,861
	Denied	392	552	635	466	334	226	205	204	3,014
	Denial Rate	14.8%	17.7%	21.1%	20.3%	21.6%	20.1%	18.3%	20.3%	19.0%
Hispanic	Originated	22	23	21	15	11	3	6	8	109
	Denied	5	10	3	8	2	5	4	1	38
	Denial Rate	18.5%	30.3%	12.5%	34.8%	15.4%	62.5%	40.0%	11.1%	25.9%

Table 45.D.9
Loan Applications by Reason for Denial
 45. Trumbull County
 2004–2011 HMDA Data

Denial Reason	2004	2005	2006	2007	2008	2009	2010	2011	Total
Debt-to-Income Ratio	59	69	83	52	44	41	43	38	429
Employment History	3	6	9	11	4	7	6	6	52
Credit History	142	130	131	122	79	63	69	51	787
Collateral	38	41	54	43	42	31	49	23	321
Insufficient Cash	10	11	10	9	10	6	2	7	65
Unverifiable Information	15	21	20	18	10	6	2	5	97
Credit Application Incomplete	30	49	54	67	53	50	25	42	370
Mortgage Insurance Denied	0	1	2	1	2	1	1	1	9
Other	101	146	86	34	25	12	10	12	426
Missing	140	211	301	186	98	33	31	42	1,042
Total	538	685	750	543	367	250	238	227	3,598

Table 45.D.10
Denial Rates by Income of Applicant
 45. Trumbull County
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	53.2%	54.5%	50.7%	45.7%	51.2%	47.6%	60.0%	67.9%	52.9%
\$15,001–\$30,000	22.8%	25.5%	32.6%	29.7%	30.6%	27.5%	24.4%	24.4%	27.4%
\$30,001–\$45,000	16.4%	19.2%	21.4%	22.5%	23.7%	19.1%	21.6%	20.8%	20.3%
\$45,001–\$60,000	15.2%	17.3%	19.9%	18.5%	19.5%	16.4%	20.8%	15.8%	17.9%
\$60,001–\$75,000	10.3%	16.0%	18.0%	18.3%	12.4%	11.8%	7.6%	22.0%	14.9%
Above \$75,000	8.3%	11.7%	11.6%	15.3%	12.2%	17.8%	9.7%	13.8%	12.0%
Data Missing	28.7%	19.4%	33.3%	18.8%	31.6%	33.3%	38.5%	40.0%	27.5%
Total	16.7%	19.1%	22.4%	21.9%	21.8%	20.7%	19.7%	20.8%	20.2%

Table 45.D.11
Denial Rates of Loans by Race/Ethnicity and Income of Applicant
 45. Trumbull County
 2004–2011 HMDA Data

Race	<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	Above \$75K	Data Missing	Average
American Indian	%	66.7%	20.0%	25.0%	%	.0%	.0%	14.8%
Asian	33.3%	28.6%	10.5%	12.5%	.0%	5.6%	.0%	12.8%
Black	69.0%	35.4%	25.9%	24.0%	20.2%	28.3%	14.3%	28.6%
White	50.3%	26.0%	18.5%	15.7%	13.8%	11.0%	23.5%	18.4%
Not Available	60.4%	37.5%	36.7%	35.8%	26.4%	18.4%	55.6%	34.6%
Not Applicable	%	.0%	100.0%	.0%	%	.0%	50.0%	28.6%
Average	52.9%	27.4%	20.3%	17.9%	14.9%	12.0%	27.5%	20.2%
Non-Hispanic Ethnicity	51.7%	26.4%	19.0%	16.1%	14.4%	11.8%	21.6%	19.0%
Hispanic (Ethnicity)	%	44.4%	27.1%	18.5%	14.3%	9.5%	.0%	25.9%

Table 45.D.12
Loan Applications by Reason for Denial by Race/Ethnicity of Applicant
 45. Trumbull County
 2004–2011 HMDA Data

Denial Reason	American Indian	Asian	Black	White	Not Available	Not Applicable	Total	Hispanic (Ethnicity)
Debt-to-Income Ratio	2	0	24	367	36	0	429	5
Employment History	0	1	1	47	3	0	52	2
Credit History	2	1	61	620	102	1	787	7
Collateral	0	1	13	281	26	0	321	5
Insufficient Cash	0	1	2	56	6	0	65	1
Unverifiable Information	0	1	10	77	9	0	97	1
Credit Application Incomplete	0	0	29	302	39	0	370	3
Mortgage Insurance Denied	0	0	2	7	0	0	9	0
Other	0	1	38	307	80	0	426	1
Missing	0	4	69	773	195	1	1,042	13
Total	4	10	249	2,837	496	2	3,598	38
% Missing	.0%	40.0%	27.7%	27.2%	39.3%	50.0%	29.0%	34.2%

Table 45.D.13
Loan Applications by Income of Applicant: Originated and Denied
 45. Trumbull County
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Loan Originated	29	30	33	25	20	22	12	9	180
	Application Denied	33	36	34	21	21	20	18	19	202
	Denial Rate	53.2%	54.5%	50.7%	45.7%	51.2%	47.6%	60.0%	67.9%	52.9%
\$15,001–\$30,000	Loan Originated	533	525	468	363	240	195	189	149	2,662
	Application Denied	157	180	226	153	106	74	61	48	1,005
	Denial Rate	22.8%	25.5%	32.6%	29.7%	30.6%	27.5%	24.4%	24.4%	27.4%
\$30,001–\$45,000	Loan Originated	747	805	790	548	377	283	276	240	4,066
	Application Denied	147	191	215	159	117	67	76	63	1,035
	Denial Rate	16.4%	19.2%	21.4%	22.5%	23.7%	19.1%	21.6%	20.8%	20.3%
\$45,001–\$60,000	Loan Originated	514	596	523	383	236	194	183	176	2,805
	Application Denied	92	125	130	87	57	38	48	33	610
	Denial Rate	15.2%	17.3%	19.9%	18.5%	19.5%	16.4%	20.8%	15.8%	17.9%
\$60,001–\$75,000	Loan Originated	338	358	264	250	176	105	109	110	1,710
	Application Denied	39	68	58	56	25	14	9	31	300
	Denial Rate	10.3%	16.0%	18.0%	18.3%	12.4%	11.8%	7.6%	22.0%	14.9%
Above \$75,000	Loan Originated	451	500	463	337	251	148	196	169	2,515
	Application Denied	41	66	61	61	35	32	21	27	344
	Denial Rate	8.3%	11.7%	11.6%	15.3%	12.2%	17.8%	9.7%	13.8%	12.0%
Data Missing	Loan Originated	72	79	52	26	13	10	8	9	269
	Application Denied	29	19	26	6	6	5	5	6	102
	Denial Rate	28.7%	19.4%	33.3%	18.8%	31.6%	33.3%	38.5%	40.0%	27.5%
Total	Loan Originated	2,684	2,893	2,593	1,932	1,313	957	973	862	14,207
	Application Denied	538	685	750	543	367	250	238	227	3,598
	Denial Rate	16.7%	19.1%	22.4%	21.9%	21.8%	20.7%	19.7%	20.8%	20.2%

Table 45.D.14
Loan Applications by Income and Race/Ethnicity of Applicant: Originated and Denied
 45. Trumbull County
 2004–2011 HMDA Data

Race		<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	> \$75K	Data Missing	Total
American Indian	Loan Originated	0	1	4	3	0	10	5	23
	Application Denied	0	2	1	1	0	0	0	4
	Denial Rate	%	66.7%	20.0%	25.0%	%	.0%	.0%	14.8%
Asian	Loan Originated	2	10	17	14	6	17	2	68
	Application Denied	1	4	2	2	0	1	0	10
	Denial Rate	33.3%	28.6%	10.5%	12.5%	.0%	5.6%	.0%	12.8%
Black	Loan Originated	9	128	186	136	75	76	12	622
	Application Denied	20	70	65	43	19	30	2	249
	Denial Rate	69.0%	35.4%	25.9%	24.0%	20.2%	28.3%	14.3%	28.6%
White	Loan Originated	150	2,347	3,600	2,456	1,523	2,251	225	12,552
	Application Denied	152	824	816	456	243	277	69	2,837
	Denial Rate	50.3%	26.0%	18.5%	15.7%	13.8%	11.0%	23.5%	18.4%
Not Available	Loan Originated	19	175	259	194	106	160	24	937
	Application Denied	29	105	150	108	38	36	30	496
	Denial Rate	60.4%	37.5%	36.7%	35.8%	26.4%	18.4%	55.6%	34.6%
Not Applicable	Loan Originated	0	1	0	2	0	1	1	5
	Application Denied	0	0	1	0	0	0	1	2
	Denial Rate	%	.0%	100.0%	.0%	%	.0%	50.0%	28.6%
Total	Loan Originated	180	2,662	4,066	2,805	1,710	2,515	269	14,207
	Application Denied	202	1,005	1,035	610	300	344	102	3,598
	Denial Rate	52.9%	27.4%	20.3%	17.9%	14.9%	12.0%	27.5%	20.2%
Non-Hispanic Ethnicity	Loan Originated	155	2,417	3,679	2,536	1,558	2,276	240	12,861
	Application Denied	166	865	865	486	262	304	66	3,014
	Denial Rate	51.7%	26.4%	19.0%	16.1%	14.4%	11.8%	21.6%	19.0%
Hispanic (Ethnicity)	Loan Originated	0	20	35	22	12	19	1	109
	Application Denied	0	16	13	5	2	2	0	38
	Denial Rate	%	44.4%	27.1%	18.5%	14.3%	9.5%	.0%	25.9%

PREDATORY LENDING

Table 45.D.15
Originated Owner-Occupied Loans by HAL Status
 45. Trumbull County
 2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Other	2,207	2,059	1,782	1,593	1,075	884	961	844	11,405
HAL	477	834	811	339	238	73	12	18	2,802
Total	2,684	2,893	2,593	1,932	1,313	957	973	862	14,207
Percent HAL	17.8%	28.8%	31.3%	17.5%	18.1%	7.6%	1.2%	2.1%	19.7%

Table 45.D.16
Loans by Loan Purpose by HAL Status
 45. Trumbull County
 2004–2011 HMDA Data

Loan Purpose		2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	Other	2,207	2,059	1,782	1,593	1,075	884	961	844	11,405
	HAL	477	834	811	339	238	73	12	18	2,802
	Percent HAL	17.8%	28.8%	31.3%	17.5%	18.1%	7.6%	1.2%	2.1%	19.7%
Home Improvement	Other	551	668	651	570	328	154	207	186	3,315
	HAL	143	212	163	175	104	61	15	10	883
	Percent HAL	20.6%	24.1%	20.0%	23.5%	24.1%	28.4%	6.8%	5.1%	21.0%
Refinancing	Other	3,147	2,548	2,151	1,956	1,526	2,119	2,349	1,965	17,761
	HAL	956	1,348	1,208	656	447	284	26	17	4,942
	Percent HAL	23.3%	34.6%	36.0%	25.1%	22.7%	11.8%	1.1%	.9%	21.8%
Total	Other	5,905	5,275	4,584	4,119	2,929	3,157	3,517	2,995	32,481
	HAL	1,576	2,394	2,182	1,170	238	73	12	18	8,627
	Percent HAL	21.1%	31.2%	32.2%	22.1%	21.2%	11.7%	1.5%	1.5%	21.0%

Table 45.D.17
HALs Originated by Race of Borrower
 45. Trumbull County
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	1	0	1	0	1	0	0	0	3
Asian	2	0	3	1	0	0	0	0	6
Black	51	71	73	25	9	3	1	1	234
White	351	568	618	272	215	69	11	17	2,121
Not Available	71	195	114	41	13	1	0	0	435
Not Applicable	1	0	2	0	0	0	0	0	3
Total	477	834	811	339	238	73	12	18	2,802
Hispanic (Ethnicity)	7	7	4	1	2	0	0	0	21

Table 45.D.18
Rate of HALs Originated by Race/Ethnicity of Borrower
 45. Trumbull County
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	25.0%	.0%	20.0%	.0%	33.3%	.0%	.0%	.0%	13.0%
Asian	16.7%	.0%	25.0%	7.7%	.0%	.0%	.0%	.0%	8.8%
Black	37.8%	48.6%	57.5%	34.7%	24.3%	8.1%	2.3%	4.2%	37.6%
White	14.7%	23.2%	27.5%	15.5%	18.0%	8.0%	1.3%	2.2%	16.9%
Not Available	48.6%	70.1%	58.2%	47.1%	16.5%	2.0%	.0%	.0%	46.4%
Not Applicable	33.3%	%	100.0%	%	%	%	%	%	60%
Average	17.8%	28.8%	31.3%	17.5%	18.1%	7.6%	01.2%	02.1%	19.7%
Non-Hispanic Ethnicity	16.4%	24.2%	29.4%	16.5%	18.3%	8.0%	1.2%	2.2%	18.0%
Hispanic (Ethnicity)	31.8%	30.4%	19.0%	6.7%	18.2%	.0%	.0%	.0%	19.3%

Table 45.D.19
Loans by HAL Status by Race/Ethnicity of Borrower
 45. Trumbull County
 2004–2011 HMDA Data

Race	Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Other	3	3	4	3	2	2	2	1	20
	HAL	1	0	1	0	1	0	0	0	3
	Percent HAL	25.0%	.0%	20.0%	.0%	33.3%	.0%	.0%	.0%	13.0%
Asian	Other	10	13	9	12	2	3	9	4	62
	HAL	2	0	3	1	0	0	0	0	6
	Percent HAL	16.7%	.0%	25.0%	7.7%	.0%	.0%	.0%	.0%	8.8%
Black	Other	84	75	54	47	28	34	43	23	388
	HAL	51	71	73	25	9	3	1	1	234
	Percent HAL	37.8%	48.6%	57.5%	34.7%	24.3%	8.1%	2.3%	4.2%	37.6%
White	Other	2,033	1,885	1,633	1,485	977	796	856	766	10,431
	HAL	351	568	618	272	215	69	11	17	2,121
	Percent HAL	14.7%	23.2%	27.5%	15.5%	18.0%	8.0%	01.3%	02.2%	16.9%
Not Available	Other	75	83	82	46	66	49	51	50	502
	HAL	71	195	114	41	13	1	0	0	435
	Percent HAL	48.6%	70.1%	58.2%	47.1%	16.5%	2.0%	.0%	.0%	46.4%
Not Applicable	Other	2	0	0	0	0	0	0	0	2
	HAL	1	0	2	0	0	0	0	0	3
	Percent HAL	33.3%	%	100.0%	%	%	%	%	%	60.0%
Total	Other	2,207	2,059	1,782	1,593	1,075	884	961	844	11,405
	HAL	477	834	811	339	238	73	12	18	2,802
	Percent HAL	17.8%	28.8%	31.3%	17.5%	18.1%	7.6%	1.2%	2.1%	19.7%
Non-Hispanic Ethnicity	Other	1,886	1,950	1,676	1,528	989	826	903	785	10,543
	HAL	371	624	699	301	222	72	11	18	2,318
	Percent HAL	16.4%	24.2%	29.4%	16.5%	18.3%	8.0%	1.2%	2.2%	18.0%
Hispanic (Ethnicity)	Other	15	16	17	14	9	3	6	8	88
	HAL	7	7	4	1	2	0	0	0	21
	Percent HAL	31.8%	30.4%	19.0%	6.7%	18.2%	.0%	.0%	.0%	19.3%

Table 45.D.20
Rates of HALs by Income of Borrower
 45. Trumbull County
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Average
\$15,000 or Below	20.7%	26.7%	36.4%	28.0%	20.0%	22.7%	8.3%	.0%	23.9%
\$15,001–\$30,000	23.6%	33.3%	42.1%	25.9%	27.5%	9.2%	1.6%	2.7%	25.7%
\$30,001–\$45,000	21.3%	35.5%	35.4%	19.3%	22.5%	8.1%	.4%	2.9%	23.3%
\$45,001–\$60,000	17.5%	27.9%	31.7%	15.9%	14.0%	6.2%	2.7%	1.7%	19.1%
\$60,001–\$75,000	13.6%	21.5%	23.5%	13.6%	13.6%	7.6%	.9%	.9%	14.8%
Above \$75,000	7.5%	19.0%	15.3%	7.7%	10.4%	4.7%	0.5%	1.8%	10.5%
Data Missing	22.2%	34.2%	44.2%	42.3%	.0%	.0%	.0%	.0%	28.6%
Average	17.8%	28.8%	31.3%	17.5%	18.1%	7.6%	1.2%	2.1%	19.7%

Table 45.D.21
Loans by HAL Status by Income of Borrower
 45. Trumbull County
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Other	23	22	21	18	16	17	11	9	137
	HAL	6	8	12	7	4	5	1	0	43
	Percent HAL	20.7%	26.7%	36.4%	28.0%	20.0%	22.7%	8.3%	.0%	23.9%
\$15,001–\$30,000	Other	407	350	271	269	174	177	186	145	1,979
	HAL	126	175	197	94	66	18	3	4	683
	Percent HAL	23.6%	33.3%	42.1%	25.9%	27.5%	9.2%	1.6%	2.7%	25.7%
\$30,001–\$45,000	Other	588	519	510	442	292	260	275	233	3,119
	HAL	159	286	280	106	85	23	1	7	947
	Percent HAL	21.3%	35.5%	35.4%	19.3%	22.5%	8.1%	.4%	2.9%	23.3%
\$45,001 – \$60,000	Other	424	430	357	322	203	182	178	173	2,269
	HAL	90	166	166	61	33	12	5	3	536
	Percent HAL	17.5%	27.9%	31.7%	15.9%	14.0%	6.2%	2.7%	1.7%	19.1%
\$60,001–\$75,000	Other	292	281	202	216	152	97	108	109	1,457
	HAL	46	77	62	34	24	8	1	1	253
	Percent HAL	13.6%	21.5%	23.5%	13.6%	13.6%	7.6%	.9%	.9%	14.8%
Above \$75,000	Other	417	405	392	311	225	141	195	166	2,252
	HAL	34	95	71	26	26	7	1	3	263
	Percent HAL	7.5%	19.0%	15.3%	7.7%	10.4%	4.7%	.5%	1.8%	10.5%
Data Missing	Other	56	52	29	15	13	10	8	9	192
	HAL	16	27	23	11	0	0	0	0	77
	Percent HAL	22.2%	34.2%	44.2%	42.3%	.0%	.0%	.0%	.0%	28.6%
Total	Other	2,207	2,059	1,782	1,593	1,075	884	961	844	11,405
	HAL	477	834	811	339	238	73	12	18	2,802
	Percent HAL	17.8%	28.8%	31.3%	17.5%	18.1%	7.6%	1.2%	2.1%	19.7%

E. CRA DATA

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

Table 45.E.1
Small Business Loans Originated: \$100,000 or Less by Tract MFI
 45. Trumbull 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	24	187	1,308	1,085		2,604
2001	18	250	1,388	1,144		2,800
2002	46	321	1,743	1,455		3,565
2003	155	287	2,388	805		3,635
2004	123	273	2,630	899		3,925
2005	128	336	2,695	876		4,035
2006	135	345	3,344	1,133		4,957
2007	129	382	3,781	1,331		5,623
2008	105	309	2,628	955		3,997
2009	55	144	1,261	469		1,929
2010	63	150	1,195	410		1,818
2011	53	178	1,455	472		2,158
Total	1,034	3,162	25,816	11,034	0	41,046
Loan Amount (\$1,000s)						
2000	293	3,050	17,529	16,667		37,539
2001	285	3,502	18,865	14,768		37,420
2002	779	3,448	16,916	15,593		36,736
2003	1,489	3,386	23,956	7,630		36,461
2004	1,594	2,817	25,611	7,480		37,502
2005	1,580	3,528	28,956	9,285		43,349
2006	1,047	4,233	32,826	10,294		48,400
2007	1,357	4,312	34,721	13,191		53,581
2008	895	2,829	24,677	7,663		36,064
2009	832	2,240	16,987	5,097		25,156
2010	1,127	3,103	18,823	6,282		29,335
2011	1,284	3,321	22,326	5,941		32,872
Total	12,562	39,769	282,193	119,891	0	454,415

Table 45.E.2
Small Business Loans Originated: \$100,001 to \$250,000 by Tract MFI
 45. Trumbull 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	6	62	70		139
2001	4	13	81	70		168
2002	1	16	62	59		138
2003	6	13	89	35		143
2004	8	10	120	28		166
2005	3	12	99	27		141
2006	7	7	86	19		119
2007	4	12	82	22		120
2008	2	7	63	7		79
2009	4	7	67	10		88
2010	3	14	75	20		112
2011	3	10	79	17		109
Total	46	127	965	384	0	1,522
Loan Amount (\$1,000s)						
2000	200	872	10,657	11,892		23,621
2001	770	2,173	13,154	11,932		28,029
2002	105	2,396	10,928	9,568		22,997
2003	890	2,232	14,903	6,101		24,126
2004	1,339	1,608	21,005	4,549		28,501
2005	382	1,990	17,280	4,667		24,319
2006	1,330	1,241	14,028	3,343		19,942
2007	582	1,689	14,256	3,756		20,283
2008	405	1,163	11,081	1,163		13,812
2009	850	1,260	11,380	1,686		15,176
2010	501	2,793	13,139	3,644		20,077
2011	634	1,752	14,184	2,811		19,381
Total	7,988	21,169	165,995	65,112	0	260,264

Table 45.E.3
Small Business Loans Originated: More than \$250,000 by Tract MFI
 45. Trumbull 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	4	51	43		99
2001	1	8	55	68		132
2002	1	7	50	61		119
2003	6	21	100	30		157
2004	4	12	104	28		148
2005	5	12	91	30		138
2006	9	4	87	21		121
2007	1	7	64	17		89
2008	0	5	44	13		62
2009	2	8	69	18		97
2010	5	11	71	15		102
2011	2	18	90	22		132
Total	37	117	876	366	0	1,396
Loan Amount (\$1,000s)						
2000	990	2,147	25,957	22,692		51,786
2001	701	3,474	28,308	33,671		66,154
2002	300	2,540	25,011	27,851		55,702
2003	2,423	11,532	49,975	13,939		77,869
2004	1,499	7,562	50,443	13,947		73,451
2005	2,629	7,271	45,877	16,139		71,916
2006	4,383	2,227	44,459	10,567		61,636
2007	415	3,679	35,341	8,311		47,746
2008	0	3,137	22,297	6,496		31,930
2009	1,300	3,940	39,466	10,389		55,095
2010	2,930	6,579	38,550	7,074		55,133
2011	900	10,664	52,856	12,521		76,941
Total	18,470	64,752	458,540	183,597	0	725,359

Table 45.E.4
Small Business Loans to Businesses with Gross Annual Revenues of Less Than \$1 Million by Tract MFI
 45. Trumbull 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	4	81	548	513		1,146
2001	5	110	623	567		1,305
2002	8	103	482	491		1,084
2003	43	79	838	281		1,241
2004	34	81	856	287		1,258
2005	58	145	1,214	364		1,781
2006	47	134	1,349	415		1,945
2007	34	144	1,473	484		2,135
2008	34	93	906	311		1,344
2009	12	46	444	125		627
2010	25	64	491	150		730
2011	25	64	665	192		946
Total	329	1,144	9,889	4,180	0	15,542
Loan Amount (\$1,000s)						
2000	1,072	3,703	20,896	29,329		55,000
2001	445	3,841	31,274	39,522		75,082
2002	482	4,809	24,102	35,244		64,637
2003	2,502	3,678	43,684	15,752		65,616
2004	1,820	2,746	35,939	12,418		52,923
2005	2,714	3,222	41,069	13,977		60,982
2006	2,144	3,067	37,927	12,932		56,070
2007	1,050	3,268	30,768	13,093		48,179
2008	866	1,793	19,122	8,585		30,366
2009	180	1,997	18,273	7,063		27,513
2010	981	3,324	23,051	6,652		34,008
2011	854	2,232	26,229	8,245		37,560
Total	15,110	37,680	352,334	202,812	0	607,936

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 45.F.1
Fair Housing Complaints by Basis
45. Trumbull County
2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color		1			1	1		1		4
Disability	3	1	4	1	1		1	1	4	16
Family Status				1	1	4				6
National Origin										
Race	1	3	1	2	1	2	1	3	1	15
Religion					1					1
Sex				1		2		1		4
Total Bases	4	5	5	5	5	9	2	6	5	46
Total Complaints	4	4	5	3	2	7	2	5	4	36

Table 45.F.2
Fair Housing Complaints by Issue
45. Trumbull 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			1		3	2	2	1	1	11
Failure to make reasonable accommodation			2	1	1				4	8
Discriminatory refusal to rent			1			1		1	1	5
Discriminatory terms, conditions, privileges, or services and facilities				1	1			1	2	5
Discriminatory advertising, statements, and notices							1	1		3
Discrimination in services and facilities relating to rental							1		2	3
Otherwise deny or make housing available				1				2		3
Discriminatory refusal to rent and negotiate for rental							1	1		2
Discriminatory advertisement - rental							2			2
Discriminatory acts under Section 818 (coercion, etc.)				1					1	2
Discriminatory refusal to sell					1					1
Discriminatory refusal to negotiate for sale							1			1
Discriminatory refusal to negotiate for rental								1		1
False denial or representation of availability - rental							1			1
Using ordinances to discriminate in zoning and land use								1		1
Total Issues	4	4	6	3	2	8	3	9	10	49
Total Complaints	4	4	5	3	2	7	2	5	4	36

Table 45.F.3
Fair Housing Complaints by Closure Status
 45. Trumbull County
 2004–2012 HUD Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Administrative Closure	1		1			3	2	2		9
Conciliated / Settled	1	2	1	1	1	1		1	1	9
No Cause	2	2	3	2	1	3		2		15
Open									3	3
Total Complaints	4	4	5	3	2	7	2	5	4	36

HUD Complaints Found With Cause

Table 45.F.4
Fair Housing Complaints Found With Cause by Basis
 45. Trumbull County
 2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color		1								1
Disability	1	1	1	1				1	1	6
Family Status					1					1
Race		1								1
Sex						1				1
Total Bases	1	3	1	1	1	1		1	1	10
Total Complaints	1	2	1	1	1	1		1	1	9

Table 45.F.5
Fair Housing Complaints Found With Cause by Issue
 45. Trumbull 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					1	1				2
Discrimination in services and facilities relating to rental							1		1	2
Otherwise deny or make housing available			1					1		2
Failure to make reasonable accommodation			1						1	2
Discriminatory refusal to rent			1							1
Discriminatory refusal to rent and negotiate for rental								1		1
Discriminatory terms, conditions, privileges, or services and facilities					1					1
Total Issues	1	2	1	1	1	1	1	0	2	11
Total Complaints	1	2	1	1	1	1	1	1	1	9

OHIO CIVIL RIGHTS COMMISSION COMPLAINTS

Table 45.F.6
Fair Housing Complaints by Basis
 45. Trumbull County
 2004–2012 OCRC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color					1			1		2
Disability	2	1	6	1	1		1	2	1	15
Family Status					1	1	1			3
Gender		1				1		1		3
National Origin						1				1
Race	3	1	1	2	2	1	1	4		15
Religion					1					1
Retaliation		1					1			2
Total Bases	5	4	7	3	5	5	4	8	1	42
Total Complaints	5	2	7	3	3	5	2	6	1	34

Table 45.F.7
Fair Housing Complaints by Issue
 45. Trumbull County
 2004–2012 OCRC Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Intimidation					1					1
Other	1	1			2	2	1	2		9
Reasonable Accommodation	2		4	1					1	8
Sexual Harassment						1				1
Terms and Conditions	2	1	4	3		2	1	4		17
Total Issues	5	2	8	4	3	5	2	6	1	36
Total Complaints	5	2	7	3	3	5	2	6	1	34

Table 45.F.8
Fair Housing Complaints by Closure Status
 45. Trumbull 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	3	1	3	1	1	2	1	4		16
Settlement With Benefits			3	1	1	1		1		7
Withdrawal With Benefits	1	1		1	1	1			1	6
Missing	1									1
Total Complaints	5	2	7	3	3	5	2	6	1	34

FAIR HOUSING CONTACT SERVICE COMPLAINTS

Table 45.F.9
Fair Housing Complaints by Basis
 45. Trumbull County
 2004–2012 FHCS Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color					2					2
Disability			1		2	1			8	12
Familial Status					6					6
Race					2	1				3
Other					1				1	2
Unknown				1						1
Total Bases	0	0	1	1	13	2	0	0	9	26
Total Complaints			1	1	8	2			9	21

Table 45.F.10
Fair Housing Complaints by Closure Status
 45. Trumbull County
 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									3	3
Lack of jurisdiction					3					3
No contact									1	1
No probable cause					1				1	2
Pending			1						2	3
Reasonable accommodation granted									1	1
Withdrawal of Charge					1					1
Total Complaints	0	0	1	1	8	2	0	0	9	21

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 45.G.1
Primary Role of Respondent
 45. Trumbull County
 2012–2013 Fair Housing Survey for Housing
 Stakeholders Data

Primary Role	Total
Advocate/Service Provider	3
Condo or Homeowner Association Leader	1
Construction/Development	2
Local Government	3
Property Management	1
Real Estate	10
Resident Advisory Council Leader	3
Other Role	2
Total	25

FEDERAL, STATE, AND LOCAL LAWS

Table 45.G.2
Familiarity with Fair Housing Laws

45. Trumbull County
2012–2013 Fair Housing Survey
for Housing Stakeholders Data

Familiarity	Total
Not Familiar	3
Somewhat Familiar	8
Very Familiar	6
Missing	8
Total	25

Table 45.G.3
Perceptions About Fair Housing Laws

45. Trumbull 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	3	1	7	25
Are fair housing laws difficult to understand or follow?	5	11	2	7	25
Do you think fair housing laws should be changed?	3	9	6	7	25
Do you think fair housing laws are adequately enforced?	10	8		7	25

Table 45.G.4
Fair Housing Activities

45. Trumbull County
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?		10	8		7	25
Have you participated in fair housing training?		10	1		14	25
Are you aware of any fair housing testing?			10	8	7	25
Testing and education	Too Little	Right Amount	Too Much	Don't Know	Missing	Total
Is there sufficient outreach and education activity?	6	4		8	7	25
Is there sufficient testing?	3	1		14	7	25

Table 45.G.5**Protected Classes**

45. Trumbull County

2012–2013 Fair Housing Survey for Housing Stakeholders Data

Protected Class	Total
Family Status	9
Religion	9
Gender	7
National Origin	7
Color	5
Sexual Orientation	3
Age	3
Military	3
Disability	3
Ancestry	3
Race	2
Other	4
Total	58

Table 45.G.6**Fair Housing Violation Referrals**

45. Trumbull County

2012–2013 Fair Housing Survey for Housing Stakeholders Data

Referral	Total
Board of Realtors	1
City	1
Don't Know	2
Greater Warren-Youngstown Urban League	3
HUD	6
Lawyer	2
Ohio Division of Real Estate and Professional Licensing	2
Other	3
Total	20

LOCAL FAIR HOUSING**Table 45.G.7****Local Fair Housing**

45. Trumbull 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	6	6	9	25
Are there any specific geographic areas that have fair housing problems?	2	2	12	9	25
Are there any specific groups in that face housing discrimination?	3	3	9	10	25

FAIR HOUSING IN THE PRIVATE SECTOR

Table 45.G.8

Barriers to Fair Housing in the Private Sector

45. Trumbull 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	10	5	8	25
The real estate industry?	1	11	5	8	25
The mortgage and home lending industry?	2	8	7	8	25
The housing construction or accessible housing design fields?	1	9	7	8	25
The home insurance industry?	1	9	7	8	25
The home appraisal industry?	1	9	7	8	25
Any other housing services?	1	10	6	8	25

FAIR HOUSING IN THE PUBLIC SECTOR

Table 45.G.9

Barriers to Fair Housing in the Public Sector

45. Trumbull 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	13	2	9	25
Zoning laws?	1	8	7	9	25
Occupancy standards or health and safety codes?	3	8	6	8	25
Property tax policies?	3	8	6	8	25
Permitting process?	1	9	7	8	25
Housing construction standards?	2	7	8	8	25
Neighborhood or community development policies?	3	8	6	8	25
Limited access to government services, such as employment services?	6	9	2	8	25
Public administrative actions or regulations?	1	8	7	9	25

NARRATIVE COMMENTS

Federal, State, and Local Laws

Table 45.G.10

How did you become aware of fair housing laws?

45. Trumbull County

2013 Fair Housing Survey Data

Comments:
<p>25 years in HUD rental programs I am part of the Trumbull Housing Collaborative and I am a homeless outreach worker Ongoing education Our agency participates on the local Housing Collaborative. personal experiences Real estate agent/Broker for the last 30 years 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</p>

Table 45.G.11
How should fair housing laws be changed?

45. Trumbull County
 2013 Fair Housing Survey Data

Comments:
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.

Local Fair Housing

Table 45.G.12
Are there any specific geographic areas that have fair housing problems?

45. Trumbull County
 2013 Fair Housing Survey Data

Comments:
The third ward. The rich class has very few medium housing rentals if any at all. yes, limits need to be placed on rental units. they are priced at above 45% of the average household income.

Table 45.G.13
Are there any specific groups in that face housing discrimination?

45. Trumbull County
 2013 Fair Housing Survey Data

Comments:
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. Individuals with mental illness and those who have a criminal background low income, convicted felons, other than registered sex offenders unemployed out of work - no rentals or not enough

Fair Housing in the Private Sector

Table 45.G.14

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

45. Trumbull County
 2013 Fair Housing Survey Data

Comments:
color Unknown. When employed we referred to the proper organizations and if they were politically connected we would be directed NOT to do it..

Table 45.G.15
Are you aware of any questionable practices or barriers to fair housing choice in the real estate industry?

45. Trumbull County
 2013 Fair Housing Survey Data

Comments:
All too common practice even today.

Table 45.G.16**Are you aware of any questionable practices or barriers to fair housing choice in the mortgage and home lending industry?**

45. Trumbull County
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"
Probable to minorities or others with large families.

Table 45.G.17**Are you aware of any questionable practices or barriers to fair housing choice in the housing construction or accessible housing design fields?**

45. Trumbull County
2013 Fair Housing Survey Data

Comments:

Sometimes the building code doesn't work. Sometimes there are NIMBYS that have too much influence.

Table 45.G.18**Are you aware of any questionable practices or barriers to fair housing choice in any other housing services?**

45. Trumbull County
2013 Fair Housing Survey Data

Comments:

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 45.G.19****Are you aware of any questionable practices or barriers to fair housing choice in land use policies?**

45. Trumbull County
2013 Fair Housing Survey Data

Comments:

Violent NYMBIS have been the rule in the past and present. There have been marches currently in 2012 in Warren against elderly housing units.

Table 45.G.20**Are you aware of any questionable practices or barriers to fair housing choice in zoning laws?**

45. Trumbull County
2013 Fair Housing Survey Data

Comments:

Inadequate.

Table 45.G.21**Are you aware of any questionable practices or barriers to fair housing choice in occupancy standards or health and safety codes?**

45. Trumbull County
2013 Fair Housing Survey Data

Comments:

Code enforcement rarely occurs here
Probably decades out of date.
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 45.G.22**Are you aware of any questionable practices or barriers to fair housing choice in property tax policies?**

45. Trumbull County
2013 Fair Housing Survey Data

Comments:
Lack of tax incentives for making home improvements Republicans have run Ohio for too long to update them. Septic

Table 45.G.23**Are you aware of any questionable practices or barriers to fair housing choice in the permitting process?**

45. Trumbull County
2013 Fair Housing Survey Data

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

Table 45.G.24**Are you aware of any questionable practices or barriers to fair housing choice in housing construction standards?**

45. Trumbull County
2013 Fair Housing Survey Data

Comments:
Septic? State and National Building codes, probably a versions behind.

Table 45.G.25**Are you aware of any questionable practices or barriers to fair housing choice in neighborhood or community development policies?**

45. Trumbull County
2013 Fair Housing Survey Data

Comments:
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. 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 45.G.26**Are you aware of any barriers that limit access to government services, such as a lack of transportation or employment services?**

45. Trumbull County
2013 Fair Housing Survey Data

Comments:
Public transportation is limited 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.

Table 45.G.27**Are you aware of any questionable practices or barriers to fair housing choice in any other public administrative actions or regulations?**45. Trumbull County
2013 Fair Housing Survey Data

Comments:
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 Trumbull County that received and completed the survey.⁷⁶

Table 45.H.1**Housing Development**
45. Trumbull 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"?	18	9	6	29	62
Guidelines that encourage development affordable housing units?	2	25	5	30	62
Any potential barriers to the development of low- to moderate- income housing?	10	17	6	29	62
Guidelines that allow the development of mixed use housing?	13	11	6	32	62
Any potential barriers to the development of mixed use housing?	10	11	9	32	62
Occupancy Standards					
A definition for the term "family"?	9	16	7	30	62
Residential occupancy standards or limits?	5	18	7	32	62
Special Needs Housing					
A definition for the term "disability"?	1	18	8	35	62
Development standards for making housing accessible to persons with disabilities?	5	13	8	36	62
A process by which persons with disabilities can request modification to the jurisdiction's policies?	5	12	10	35	62
Standards for the development of senior housing?	3	16	8	35	62
Guidelines that distinguish senior citizen housing from other residential uses?	2	19	6	35	62
Guidelines for developing housing for any other special needs populations?	1	19	7	35	62
Fair Housing Policies					
A fair housing ordinance, policy, or regulation?	3	14	9	36	62
Policies or practices for "affirmatively furthering fair housing"?	5	13	8	36	62

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.

I. IMPEDIMENTS

The 2013 Northeast Ohio Regional Analysis of Impediments to Fair Housing Choice uncovered several potential issues regarding fair housing in the Trumbull 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 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 Trumbull 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 local communities within Trumbull County*

While Trumbull County Commissioners as well as the County Housing Collaborative often meet to address housing related issues, results of the Fair Housing Surveys indicate that some local communities in the County lack or do not have sufficient policies or practices to completely address the duty to affirmatively further fair housing.

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

Northeast Ohio, and Trumbull County in particular, tends to have a strong fair housing advocacy base. However, even though Trumbull County conducts an outreach and education campaign each year, there still seems to be a lack of a sufficient fair housing outreach and education component to these advocacy efforts. This was supported by input received in the Fair Housing Survey as well as in the fair housing forums and in written input received after release of the Draft Report for Public Review.

Suggestion: Conduct more outreach and educational activities in a uniform, methodical, and consistent fashion. This should be done in consort with other for-profit, non-profit, and local units of government as co-sponsors.

3. *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. Trumbull County is no different.

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.

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 in Trumbull County. 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 45.I.1
Impediments Matrix
 45. Trumbull 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			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	Some land use and planning decisions and operational practices resulting in unequal access to government services such as transportation							X		X	All	M
3	Policies and practices used decades ago resulted in segregation of minority populations							X		X	All	M
4	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.

46. CITY OF WARREN

A. CENSUS BUREAU DATA

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

Table 46.A.1

Population by Age

46. City of Warren

2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Under 5	3,705	7.9%	2,889	7.0%	-22.0%
5 to 19	9,797	20.9%	8,002	19.3%	-18.3%
20 to 24	2,856	6.1%	2,792	6.7%	-2.2%
25 to 34	6,234	13.3%	5,499	13.2%	-11.8%
35 to 54	12,230	26.1%	10,861	26.1%	-11.2%
55 to 64	4,147	8.9%	4,869	11.7%	17.4%
65 or Older	7,863	16.8%	6,645	16.0%	-15.5%
Total	46,832	100.0%	41,557	100.0%	-11.3%

Table 46.A.2

Elderly Population by Age

46. City of Warren

2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
65 to 66	748	9.5%	746	11.2%	-.3%
67 to 69	1,122	14.3%	981	14.8%	-12.6%
70 to 74	2,002	25.5%	1,430	21.5%	-28.6%
75 to 79	1,757	22.3%	1,310	19.7%	-25.4%
80 to 84	1,234	15.7%	1,136	17.1%	-7.9%
85 or Older	1,000	12.7%	1,042	15.7%	4.2%
Total	7,863	100.0%	6,645	100.0%	-15.5%

Table 46.A.3

Population by Race and Ethnicity

46. City of Warren

2000 & 2010 Census SF1 Data

Race	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
White	33,690	71.9%	28,114	67.7%	-16.6%
Black	11,802	25.2%	11,522	27.7%	-2.4%
American Indian	62	.1%	96	.2%	54.8%
Asian	195	.4%	166	.4%	-14.9%
Native Hawaiian/ Pacific Islander	16	.0%	6	.0%	-62.5%
Other	142	.3%	274	.7%	93.0%
Two or More Races	925	2.0%	1,379	3.3%	49.1%
Total	46,832	100.0%	41,557	100.0%	-11.3%
Non-Hispanic	46,347	99.0%	40,760	98.1%	-12.1%
Hispanic	485	1.0%	797	1.9%	64.3%

Table 46.A.4
Disability by Age
 46. City of Warren
 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	1.3%	23	.7%
5 to 17	339	8.8%	269	7.1%	608	7.9%
18 to 34	379	11.1%	454	10.0%	833	10.5%
35 to 64	1,218	16.8%	1,205	16.4%	2,423	16.6%
65 to 74	374	29.2%	556	33.1%	930	31.4%
75 or Older	496	44.3%	990	54.8%	1,486	50.8%
Total	2,806	15.1%	3,497	16.7%	6,303	15.9%

Table 46.A.5
Employment Status by Disability and Type: Age 18 to 64
 46. City of Warren
 2010 Three-Year ACS Data

Disability Status	Population
Employed:	13,219
With a disability:	561
With a hearing difficulty	46
With a vision difficulty	88
With a cognitive difficulty	226
With an ambulatory difficulty	241
With a self-care difficulty	57
With an independent living difficulty	132
No disability	12,658
Unemployed:	2,113
With a disability:	268
With a hearing difficulty	48
With a vision difficulty	0
With a cognitive difficulty	174
With an ambulatory difficulty	104
With a self-care difficulty	63
With an independent living difficulty	77
No disability	1,845
Not in labor force:	7,227
With a disability:	2,427
With a hearing difficulty	233
With a vision difficulty	324
With a cognitive difficulty	1,035
With an ambulatory difficulty	1,500
With a self-care difficulty	561
With an independent living difficulty	1,143
No disability	4,800
Total	22,559

Table 46.A.6
Households by Income

46. City of Warren
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	4,727	24.5%	4,449	26.7%
\$15,000 to \$19,999	1,702	8.8%	1,375	8.3%
\$20,000 to \$24,999	1,598	8.3%	1,207	7.3%
\$25,000 to \$34,999	3,016	15.6%	1,921	11.5%
\$35,000 to \$49,999	3,372	17.5%	3,043	18.3%
\$50,000 to \$74,999	2,873	14.9%	2,616	15.7%
\$75,000 to \$99,999	1,178	6.1%	1,074	6.5%
\$100,000 or More	826	4.3%	951	5.7%
Total	19,292	100.0%	16,636	100.0%

Table 46.A.7
Poverty by Age

46. City of Warren
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	1,559	17.6%	1,956	16.4%
6 to 17	2,079	23.5%	3,126	26.2%
18 to 64	4,478	50.6%	6,062	50.9%
65 or Older	731	8.3%	777	6.5%
Total	8,847	100.0%	11,921	100.0%
Poverty Rate	19.4%	.	29.6%	.

Table 46.A.8
Households by Year Home Built

46. City of Warren
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	5,329	27.6%	4,246	25.5%
1940 to 1949	3,070	15.9%	2,519	15.1%
1950 to 1959	4,420	22.9%	4,018	24.2%
1960 to 1969	3,340	17.3%	3,224	19.4%
1970 to 1979	2,112	10.9%	1,289	7.7%
1980 to 1989	512	2.7%	592	3.6%
1990 to 1999	517	2.7%	397	2.4%
2000 to 2004	.	.	255	1.5%
2005 or Later	.	.	96	.6%
Total	19,300	100.0%	16,636	100.0%

Table 46.A.9
Housing Units by Type

46. City of Warren
2000 Census SF3 & 2010 Five-Year ACS Data

Unit Type	2000 Census		2010 Five-Year ACS	
	Units	% of Total	Units	% of Total
Single-Family	15,219	71.3%	15,000	73.3%
Duplex	1,447	6.8%	1,022	5.0%
Tri- or Four-Plex	1,439	6.7%	1,405	6.9%
Apartment	3,178	14.9%	2,992	14.6%
Mobile Home	54	.3%	54	.3%
Boat, RV, Van, Etc.	14	.1%	0	.0%
Total	21,351	100.0%	20,473	100.0%

Table 46.A.10
Housing Units by Tenure

46. City of Warren
2000 & 2010 Census SF1 Data

Tenure	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
Occupied Housing Units	19,288	90.6%	17,003	83.4%	-11.8%
Owner-Occupied	11,267	58.4%	9,610	56.5%	-14.7%
Renter-Occupied	8,021	41.6%	7,393	43.5%	-7.8%
Vacant Housing Units	1,991	9.4%	3,381	16.6%	69.8%
Total Housing Units	21,279	100.0%	20,384	100.0%	-4.2%

Table 46.A.11
Disposition of Vacant Housing Units

46. City of Warren
2000 & 2010 Census SF1 Data

Disposition	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
For Rent	1,043	52.4%	1,143	33.8%	9.6%
For Sale	291	14.6%	408	12.1%	40.2%
Rented or Sold, Not Occupied	404	20.3%	139	4.1%	-65.6%
For Seasonal, Recreational, or Occasional Use	50	2.5%	67	2.0%	34.0%
For Migrant Workers	0	0.0%	0	.0%	%
Other Vacant	203	10.2%	1,624	48.0%	700.0%
Total	1,991	100.0%	3,381	100.0%	69.8%

Table 46.A.12
Households by Household Size

46. City of Warren
2000 & 2010 Census SF1 Data

Size	2000 Census		2010 Census		% Change 00-10
	Households	% of Total	Households	% of Total	
One Person	6,344	32.9%	6,050	35.6%	-4.6%
Two Persons	6,045	31.3%	5,298	31.2%	-12.4%
Three Persons	3,060	15.9%	2,560	15.1%	-16.3%
Four Persons	2,174	11.3%	1,719	10.1%	-20.9%
Five Persons	1,024	5.3%	806	4.7%	-21.3%
Six Persons	408	2.1%	341	2.0%	-16.4%
Seven Persons or More	233	1.2%	229	1.3%	-1.7%
Total	19,288	100.0%	17,003	100.0%	-11.8%

Table 46.A.13
Household Type by Tenure
 46. City of Warren
 2000 & 2010 Census SF1 Data

Household Type	2000 Census		2010 Census		% Change 00–10
	Households	% of Total	Households	% of Total	
Family Households	12,035	62.4%	10,013	58.9%	-16.8%
Married-Couple Family	7,411	61.6%	5,412	54.0%	-27.0%
Owner-Occupied	5,821	78.5%	4,347	80.3%	-25.3%
Renter-Occupied	1,590	21.5%	1,065	19.7%	-33.0%
Other Family	4,624	38.4%	4,601	46.0%	-.5%
Male Householder, No Spouse	878	19.0%	978	21.3%	11.4%
Owner-Occupied	461	52.5%	503	51.4%	9.1%
Renter-Occupied	417	47.5%	475	48.6%	13.9%
Female Householder, No Spouse	3,746	81.0%	3,623	78.7%	-3.3%
Owner-Occupied	1,470	39.2%	1,335	36.8%	-9.2%
Renter-Occupied	2,276	60.8%	2,288	63.2%	.5%
Non-Family Households	7,253	37.6%	6,990	41.1%	-3.6%
Owner-Occupied	3,515	48.5%	3,425	49.0%	-2.6%
Renter-Occupied	3,738	51.5%	3,565	51.0%	-4.6%
Total	19,288	100.0%	17,003	100.0%	-11.8%

Table 46.A.14
Group Quarters Population
 46. City of Warren
 2000 & 2010 Census SF1 Data

Group Quarters Type	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Institutionalized					
Correctional Institutions	327	31.5%	1,756	76.3%	437.0%
Juvenile Facilities	.	.	21	.9%	.
Nursing Homes	702	67.6%	525	22.8%	-25.2%
Other Institutions	10	1.0%	0	.0%	-100.0%
Total	1,039	100.0%	2,302	100.0%	121.6%
Noninstitutionalized					
College Dormitories	0	.0%	0	.0%	%
Military Quarters	0	.0%	0	.0%	%
Other Noninstitutional	122	100.0%	215	100.0%	76.2%
Total	122	10.5%	215	8.5%	76.2%
Total Group Quarters Population	1,161	100.0%	2,517	100.0%	116.8%

Table 46.A.15
Overcrowding and Severe Overcrowding
 46. City of Warren
 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	11,210	99.3%	54	.5%	27	.2%	11,291
2010 ACS	9,465	98.8%	115	1.2%	0	.0%	9,580
Renter							
2000 Census	7,703	96.2%	265	3.3%	41	.5%	8,009
2010 ACS	6,896	97.7%	124	1.8%	36	.5%	7,056
Total							
2000 Census	18,913	98.0%	319	1.7%	68	.4%	19,300
2010 ACS	16,361	98.3%	239	1.4%	36	.2%	16,636

Table 46.A.16
Households with Incomplete Plumbing Facilities
 46. City of Warren
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Plumbing Facilities	19,222	16,552
Lacking Complete Plumbing Facilities	78	84
Total Households	19,300	16,636
Percent Lacking	.4%	.5%

Table 46.A.17
Households with Incomplete Kitchen Facilities
 46. City of Warren
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Kitchen Facilities	19,210	16,475
Lacking Complete Kitchen Facilities	90	161
Total Households	19,300	16,636
Percent Lacking	.5%	1.0%

Table 46.A.18
Cost Burden and Severe Cost Burden by Tenure
 46. City of Warren
 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	5,030	79.0%	755	11.9%	552	8.7%	27	.4%	6,364
2010 ACS	3,891	63.6%	1,148	18.8%	1,070	17.5%	7	.1%	6,116
Owner Without a Mortgage									
2000 Census	3,894	90.1%	187	4.3%	157	3.6%	86	2.0%	4,324
2010 ACS	2,789	80.5%	421	12.2%	232	6.7%	22	.6%	3,464
Renter									
2000 Census	4,563	57.0%	1,437	17.9%	1,479	18.5%	530	6.6%	8,009
2010 ACS	2,824	40.0%	1,823	25.8%	1,633	23.1%	776	11.0 %	7,056
Total									
2000 Census	13,487	72.1%	2,379	12.7%	2,188	11.7%	643	3.4%	18,697
2010 ACS	9,504	57.1%	3,392	20.4%	2,935	17.6%	805	4.8%	16,636

Table 46.A.19
Median Housing Costs
 46. City of Warren
 2000 Census SF3 & 2010 Five-Year ACS Data

Housing Cost	2000 Census	2010 ACS
Median Contract Rent	\$355	\$438
Median Home Value	\$63,400	\$72,200

B. BLS DATA

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

Table 46.B.1
Labor Force Statistics
 46. City of Warren
 1990–2011 BLS Data

Year	Labor Force	Employment	Unemployment	Unemployment Rate	Statewide Unemployment Rate
1990	22,478	19,899	2,579	11.5%	5.7%
1991	22,617	19,915	2,702	11.9%	6.6%
1992	23,372	19,863	3,509	15.0%	7.4%
1993	22,899	19,905	2,994	13.1%	6.7%
1994	22,828	20,219	2,609	11.4%	5.6%
1995	22,935	20,634	2,301	10.0%	4.9%
1996	22,715	20,534	2,181	9.6%	5.0%
1997	22,728	20,776	1,952	8.6%	4.6%
1998	22,877	20,779	2,098	9.2%	4.3%
1999	22,580	20,732	1,848	8.2%	4.3%
2000	20,215	18,687	1,528	7.6%	4.0%
2001	20,216	18,338	1,878	9.3%	4.4%
2002	20,193	18,115	2,078	10.3%	5.7%
2003	19,861	18,246	1,615	8.1%	6.2%
2004	19,556	17,917	1,639	8.4%	6.1%
2005	19,443	18,002	1,441	7.4%	5.9%
2006	19,411	18,109	1,302	6.7%	5.4%
2007	19,299	17,984	1,315	6.8%	5.6%
2008	19,282	17,665	1,617	8.4%	6.5%
2009	19,526	16,695	2,831	14.5%	10.1%
2010	18,139	15,853	2,286	12.6%	10.0%
2011	17,847	15,940	1,907	10.7%	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.⁷⁸ The information presented in this section presents detailed HMDA data, including denial rates and predatory lending including high annual percentage rate (APR) loans.

Table 46.C.1
Purpose of Loan by Year
46. City of Warren
2004–2011 HMDA Data

Purpose	2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	1,200	1,354	1,278	796	462	333	334	257	6,014
Home Improvement	437	608	482	425	243	141	107	89	2,532
Refinancing	2,956	2,819	2,350	1,575	1,070	855	749	611	12,985
Total	4,593	4,781	4,110	2,796	1,775	1,329	1,190	957	21,531

Table 46.C.2
Occupancy Status for Home Purchase Loan Applications
46. City of Warren
2004–2011 HMDA Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	Total
Owner-Occupied	1,085	1,159	1,119	672	417	308	298	224	5,282
Not Owner-Occupied	102	183	152	121	45	25	34	33	695
Not Applicable	13	12	7	3	0	0	2	0	37
Total	1,200	1,354	1,278	796	462	333	334	257	6,014

Table 46.C.3
Owner-Occupied Home Purchase Loan Applications by Loan Type
46. City of Warren
2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Conventional	902	972	982	531	196	112	111	77	3,883
FHA - Insured	163	165	129	128	206	182	166	131	1,270
VA - Guaranteed	20	22	8	13	15	14	21	16	129
Rural Housing Service or Farm Service Agency	0	0	0	0	0	0	0	0	0
Total	1,085	1,159	1,119	672	417	308	298	224	5,282

⁷⁸ 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 46.C.4
Loan Applications by Action Taken
 46. City of Warren
 2004–2011 HMDA Data

Action	2004	2005	2006	2007	2008	2009	2010	2011	Total
Loan Originated	562	596	546	332	208	141	145	101	2,631
Application Approved but not Accepted	99	100	67	37	14	10	9	10	346
Application Denied	148	171	220	146	77	46	45	33	886
Application Withdrawn by Applicant	89	116	72	28	23	6	7	10	351
File Closed for Incompleteness	22	18	17	13	5	1	2	1	79
Loan Purchased by the Institution	165	157	197	116	90	104	90	69	988
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	1,085	1,159	1,119	672	417	308	298	224	5,282
Denial Rate	20.8%	22.3%	28.7%	30.5%	27.0%	24.6%	23.7%	24.6%	25.2%

Table 46.C.5
Denial Rates by Gender of Applicant
 46. City of Warren
 2004–2011 HMDA Data

Year	Male	Female	Not Available	Not Applicable	Average
2004	16.8%	24.6%	48.1%	%	20.8%
2005	20.4%	21.6%	54.5%	%	22.3%
2006	24.5%	32.5%	47.5%	.0%	28.7%
2007	28.2%	33.8%	37.5%	%	30.5%
2008	23.5%	31.1%	30.8%	%	27.0%
2009	27.0%	21.5%	25.0%	%	24.6%
2010	22.9%	24.4%	28.6%	%	23.7%
2011	18.5%	37.2%	20.0%	%	24.6%
Average	22.2%	27.6%	42.6%	.0%	25.2%

Table 46.C.6
Loan Applications by Selected Action Taken by Gender of Applicant
 46. City of Warren
 2004–2011 HMDA Data

Gender		2004	2005	2006	2007	2008	2009	2010	2011	Total
Male	Originated	352	359	324	211	117	73	81	66	1,583
	Denied	71	92	105	83	36	27	24	15	453
	Denial Rate	16.8%	20.4%	24.5%	28.2%	23.5%	27.0%	22.9%	18.5%	22.2%
Female	Originated	196	222	199	106	82	62	59	27	953
	Denied	64	61	96	54	37	17	19	16	364
	Denial Rate	24.6%	21.6%	32.5%	33.8%	31.1%	21.5%	24.4%	37.2%	27.6%
Not Available	Originated	14	15	21	15	9	6	5	8	93
	Denied	13	18	19	9	4	2	2	2	69
	Denial Rate	48.1%	54.5%	47.5%	37.5%	30.8%	25.0%	28.6%	20.0%	42.6%
Not Applicable	Originated	0	0	2	0	0	0	0	0	2
	Denied	0	0	0	0	0	0	0	0	0
	Denial Rate	%	%	.0%	%	%	%	%	%	.0%
Total	Originated	562	596	546	332	208	141	145	101	2,631
	Denied	148	171	220	146	77	46	45	33	886
	Denial Rate	20.8%	22.3%	28.7%	30.5%	27.0%	24.6%	23.7%	24.6%	25.2%

Table 46.C.7
Denial Rates by Race/Ethnicity of Applicant
 46. City of Warren
 2004–2011 HMDA Data

Race/Ethnicity	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	%	%	33.3%	%	%	%	%	%	33.3%
Asian	.0%	.0%	.0%	.0%	50.0%	%	50.0%	%	13.3%
Black	22.4%	24.5%	40.2%	28.0%	41.9%	33.3%	26.7%	25.0%	29.8%
White	18.1%	19.9%	24.1%	29.9%	23.5%	22.2%	21.5%	23.4%	22.5%
Not Available	40.3%	37.5%	46.8%	41.3%	50.0%	45.5%	35.7%	36.4%	41.6%
Not Applicable	50.0%	%	.0%	%	%	0%	0%	%	25.0%
Average	20.8%	22.3%	28.7%	30.5%	27.0%	24.6%	23.7%	24.6%	25.2%
Non-Hispanic	19.1%	20.7%	26.7%	29.4%	27.3%	23.9%	21.8%	23.6%	23.9%
Hispanic	14.3%	.0%	33.3%	80.0%	16.7%	%	50.0%	%	32.1%

Table 46.C.8
Loan Applications by Selected Action Taken by Race/Ethnicity of Applicant
 46. City of Warren
 2004–2011 HMDA Data

Race		2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Originated	0	0	2	0	0	0	0	0	2
	Denied	0	0	1	0	0	0	0	0	1
	Denial Rate	%	%	33.3%	%	%	%	%	%	33.3%
Asian	Originated	3	3	1	4	1	0	1	0	13
	Denied	0	0	0	0	1	0	1	0	2
	Denial Rate	.0%	.0%	.0%	.0%	50.0%	%	50.0%	%	13.3%
Black	Originated	83	80	67	36	18	12	22	9	327
	Denied	24	26	45	14	13	6	8	3	139
	Denial Rate	22.4%	24.5%	40.2%	28.0%	41.9%	33.3%	26.7%	25.0%	29.8%
White	Originated	435	463	432	265	182	123	113	85	2,098
	Denied	96	115	137	113	56	35	31	26	609
	Denial Rate	18.1%	19.9%	24.1%	29.9%	23.5%	22.2%	21.5%	23.4%	22.5%
Not Available	Originated	40	50	42	27	7	6	9	7	188
	Denied	27	30	37	19	7	5	5	4	134
	Denial Rate	40.3%	37.5%	46.8%	41.3%	50.0%	45.5%	35.7%	36.4%	41.6%
Not Applicable	Originated	1	0	2	0	0	0	0	0	3
	Denied	1	0	0	0	0	0	0	0	1
	Denial Rate	40.3%	37.5%	46.8%	41.3%	50.0%	45.5%	35.7%	36.4%	25.0%
Total	Originated	562	596	546	332	208	141	145	101	2,631
	Denied	148	171	220	146	77	46	45	33	886
	Denial Rate	20.8%	22.3%	28.7%	30.5%	27.0%	24.6%	23.7%	24.6%	25.2%
Non-Hispanic	Originated	469	534	499	310	192	134	136	94	2,368
	Denied	111	139	182	129	72	42	38	29	742
	Denial Rate	19.1%	20.7%	26.7%	29.4%	27.3%	23.9%	21.8%	23.6%	23.9%
Hispanic	Originated	6	2	4	1	5	0	1	0	19
	Denied	1	0	2	4	1	0	1	0	9
	Denial Rate	14.3%	.0%	33.3%	80.0%	16.7%	%	50.0%	%	32.1%

Table 46.C.9
Loan Applications by Reason for Denial
 46. City of Warren
 2004–2011 HMDA Data

Denial Reason	2004	2005	2006	2007	2008	2009	2010	2011	Total
Debt-to-Income Ratio	14	16	22	9	6	8	8	7	90
Employment History	0	2	4	7	0	0	1	2	16
Credit History	39	31	49	33	27	16	14	8	217
Collateral	6	6	10	11	8	4	6	4	55
Insufficient Cash	3	1	0	3	2	2	1	0	12
Unverifiable Information	5	5	2	7	4	1	0	1	25
Credit Application Incomplete	8	17	15	17	11	9	9	6	92
Mortgage Insurance Denied	0	0	0	1	0	0	0	0	1
Other	31	39	21	8	5	1	2	1	108
Missing	42	54	97	50	14	5	4	4	270
Total	148	171	220	146	77	46	45	33	886

Table 46.C.10
Denial Rates by Income of Applicant
 46. City of Warren
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	50.0%	41.4%	48.1%	46.2%	90.9%	75.0%	88.9%	75.0%	56.7%
\$15,001–\$30,000	26.6%	25.7%	37.2%	40.4%	37.8%	25.4%	24.6%	25.7%	31.3%
\$30,001–\$45,000	16.7%	22.2%	21.6%	26.5%	15.7%	23.8%	19.4%	18.6%	20.9%
\$45,001–\$60,000	18.2%	22.1%	27.3%	18.2%	21.1%	9.1%	18.5%	25.0%	21.3%
\$60,001–\$75,000	9.7%	14.0%	25.6%	28.2%	5.3%	25.0%	10.0%	18.2%	16.7%
Above \$75,000	16.2%	5.2%	12.2%	31.0%	23.1%	15.4%	8.3%	13.3%	15.5%
Data Missing	26.3%	28.6%	31.3%	16.7%	25.0%	50.0%	100.0%	50.0%	29.6%
Total	20.8%	22.3%	28.7%	30.5%	27.0%	24.6%	23.7%	24.6%	25.2%

Table 46.C.11
Denial Rates of Loans by Race/Ethnicity and Income of Applicant
 46. City of Warren
 2004–2011 HMDA Data

Race	<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	Above \$75K	Data Missing	Average
American Indian	%	100.0%	%	%	%	%	.0%	33.3%
Asian	%	25.0%	.0%	33.3%	.0%	.0%	%	13.3%
Black	64.0%	35.6%	25.2%	21.4%	19.4%	35.3%	.0%	29.8%
White	53.3%	29.8%	18.1%	17.1%	15.5%	11.7%	23.9%	22.5%
Not Available	66.7%	39.2%	38.1%	51.8%	27.8%	21.1%	66.7%	41.6%
Not Applicable	%	.0%	100.0%	%	%	.0%	.0%	25.0%
Average	56.7%	31.3%	20.9%	21.3%	16.7%	15.5%	29.6%	25.2%
Non-Hispanic Ethnicity	56.3%	30.4%	19.8%	18.5%	16.4%	15.2%	20.0%	23.9%
Hispanic (Ethnicity)	%	63.6%	11.1%	.0%	.0%	33.3%	%	32.1%

Table 46.C.12
Loan Applications by Reason for Denial by Race/Ethnicity of Applicant
 46. City of Warren
 2004–2011 HMDA Data

Denial Reason	American Indian	Asian	Black	White	Not Available	Not Applicable	Total	Hispanic (Ethnicity)
Debt-to-Income Ratio	0	0	9	75	6	0	90	1
Employment History	0	0	1	12	3	0	16	1
Credit History	1	0	42	150	23	1	217	2
Collateral	0	0	6	41	8	0	55	0
Insufficient Cash	0	0	2	8	2	0	12	0
Unverifiable Information	0	0	5	16	4	0	25	1
Credit Application Incomplete	0	0	20	64	8	0	92	0
Mortgage Insurance Denied	0	0	0	1	0	0	1	0
Other	0	0	18	70	20	0	108	0
Missing	0	2	36	172	60	0	270	4
Total	1	2	139	609	134	1	886	9
% Missing	.0%	100.0%	25.9%	28.2%	44.8%	.0%	30.5%	44.4%

Table 46.C.13
Loan Applications by Income of Applicant: Originated and Denied
 46. City of Warren
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Loan Originated	11	17	14	7	1	2	1	2	55
	Application Denied	11	12	13	6	10	6	8	6	72
	Denial Rate	50.0%	41.4%	48.1%	46.2%	90.9%	75.0%	88.9%	75.0%	56.7%
\$15,001–\$30,000	Loan Originated	171	179	167	87	61	53	52	26	796
	Application Denied	62	62	99	59	37	18	17	9	363
	Denial Rate	26.6%	25.7%	37.2%	40.4%	37.8%	25.4%	24.6%	25.7%	31.3%
\$30,001–\$45,000	Loan Originated	180	179	189	122	75	48	50	35	878
	Application Denied	36	51	52	44	14	15	12	8	232
	Denial Rate	16.7%	22.2%	21.6%	26.5%	15.7%	23.8%	19.4%	18.6%	20.9%
\$45,001–\$60,000	Loan Originated	99	102	93	54	30	20	22	15	435
	Application Denied	22	29	35	12	8	2	5	5	118
	Denial Rate	18.2%	22.1%	27.3%	18.2%	21.1%	9.1%	18.5%	25.0%	21.3%
\$60,001–\$75,000	Loan Originated	56	49	29	28	18	6	9	9	204
	Application Denied	6	8	10	11	1	2	1	2	41
	Denial Rate	9.7%	14.0%	25.6%	28.2%	5.3%	25.0%	10.0%	18.2%	16.7%
Above \$75,000	Loan Originated	31	55	43	29	20	11	11	13	213
	Application Denied	6	3	6	13	6	2	1	2	39
	Denial Rate	16.2%	5.2%	12.2%	31.0%	23.1%	15.4%	8.3%	13.3%	15.5%
Data Missing	Loan Originated	14	15	11	5	3	1	0	1	50
	Application Denied	5	6	5	1	1	1	1	1	21
	Denial Rate	26.3%	28.6%	31.3%	16.7%	25.0%	50.0%	100.0%	50.0%	29.6%
Total	Loan Originated	562	596	546	332	208	141	145	101	2,631
	Application Denied	148	171	220	146	77	46	45	33	886
	Denial Rate	20.8%	22.3%	28.7%	30.5%	27.0%	24.6%	23.7%	24.6%	25.2%

Table 46.C.14
Loan Applications by Income and Race/Ethnicity of Applicant: Originated and Denied

46. City of Warren
 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	2	2
	Application Denied	0	1	0	0	0	0	0	1
	Denial Rate	%	100.0%	%	%	%	%	.0%	33.3%
Asian	Loan Originated	0	3	5	2	2	1	0	13
	Application Denied	0	1	0	1	0	0	0	2
	Denial Rate	%	25.0%	.0%	33.3%	.0%	.0%	%	13.3%
Black	Loan Originated	9	94	104	66	25	22	7	327
	Application Denied	16	52	35	18	6	12	0	139
	Denial Rate	64.0%	35.6%	25.2%	21.4%	19.4%	35.3%	.0%	29.8%
White	Loan Originated	42	639	704	340	164	174	35	2,098
	Application Denied	48	271	156	70	30	23	11	609
	Denial Rate	53.3%	29.8%	18.1%	17.1%	15.5%	11.7%	23.9%	22.5%
Not Available	Loan Originated	4	59	65	27	13	15	5	188
	Application Denied	8	38	40	29	5	4	10	134
	Denial Rate	66.7%	39.2%	38.1%	51.8%	27.8%	21.1%	66.7%	41.6%
Not Applicable	Loan Originated	0	1	0	0	0	1	1	3
	Application Denied	0	0	1	0	0	0	0	1
	Denial Rate	%	.0%	100.0%	%	%	.0%	.0%	25.0%
Total	Loan Originated	55	796	878	435	204	213	50	2,631
	Application Denied	72	363	232	118	41	39	21	886
	Denial Rate	56.7%	31.3%	20.9%	21.3%	16.7%	15.5%	29.6%	25.2%
Non-Hispanic Ethnicity	Loan Originated	49	715	784	397	184	195	44	2,368
	Application Denied	63	313	194	90	36	35	11	742
	Denial Rate	56.3%	30.4%	19.8%	18.5%	16.4%	15.2%	20.0%	23.9%
Hispanic (Ethnicity)	Loan Originated	0	4	8	4	1	2	0	19
	Application Denied	0	7	1	0	0	1	0	9
	Denial Rate	%	63.6%	11.1%	.0%	.0%	33.3%	%	32.1%

PREDATORY LENDING

Table 46.C.15
Originated Owner-Occupied Loans by HAL Status

46. City of Warren
 2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Other	401	396	303	254	159	135	143	100	1,891
HAL	161	200	243	78	49	6	2	1	740
Total	562	596	546	332	208	141	145	101	2,631
Percent HAL	28.6%	33.6%	44.5%	23.5%	23.6%	4.3%	1.4%	1.0%	28.1%

Table 46.C.16
Loans by Loan Purpose by HAL Status
 46. City of Warren
 2004–2011 HMDA Data

Loan Purpose		2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	Other	401	396	303	254	159	135	143	100	1,891
	HAL	161	200	243	78	49	6	2	1	740
	Percent HAL	28.6%	33.6%	44.5%	23.5%	23.6%	4.3%	1.4%	1.0%	28.1%
Home Improvement	Other	87	103	91	84	48	23	24	24	484
	HAL	39	53	50	43	17	16	2	2	222
	Percent HAL	31.0%	34.0%	35.5%	33.9%	26.2%	41.0%	7.7%	7.7%	31.4%
Refinancing	Other	508	360	305	230	197	235	229	213	2,277
	HAL	233	351	287	130	90	51	3	3	1,148
	Percent HAL	31.4%	49.4%	48.5%	36.1%	31.4%	17.8%	1.3%	1.4%	33.5%
Total	Other	996	859	699	568	404	393	396	337	4,652
	HAL	433	604	580	251	49	6	2	1	2,110
	Percent HAL	30.3%	41.3%	45.3%	30.6%	27.9%	15.7%	1.7%	1.7%	31.2%

Table 46.C.17
HALs Originated by Race of Borrower
 46. City of Warren
 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	0	1	0	0	0	0	0	2
Black	34	39	42	12	6	0	1	0	134
White	99	121	166	47	43	6	1	1	484
Not Available	27	40	32	19	0	0	0	0	118
Not Applicable	0	0	2	0	0	0	0	0	2
Total	161	200	243	78	49	6	2	1	740
Hispanic (Ethnicity)	2	0	1	1	0	0	0	0	4

Table 46.C.18
Rate of HALs Originated by Race/Ethnicity of Borrower
 46. City of Warren
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	%	%	.0%	%	%	%	%	%	.0%
Asian	33.3%	.0%	100.0%	.0%	.0%	%	.0%	%	15.4%
Black	41.0%	48.8%	62.7%	33.3%	33.3%	.0%	4.5%	.0%	41.0%
White	22.8%	26.1%	38.4%	17.7%	23.6%	4.9%	.9%	1.2%	23.1%
Not Available	67.5%	80.0%	76.2%	70.4%	.0%	.0%	.0%	.0%	62.8%
Not Applicable	.0%	%	100.0%	%	%	%	%	%	67%
Average	28.6%	33.6%	44.5%	23.5%	23.6%	4.3%	01.4%	01.0%	28.1%
Non-Hispanic Ethnicity	26.2%	28.3%	42.5%	20.6%	24.5%	4.5%	.7%	1.1%	25.5%
Hispanic (Ethnicity)	33.3%	.0%	25.0%	100.0%	.0%	%	.0%	%	21.1%

Table 46.C.19
Loans by HAL Status by Race/Ethnicity of Borrower
 46. City of Warren
 2004–2011 HMDA Data

Race	Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Other	0	0	2	0	0	0	0	0	2
	HAL	0	0	0	0	0	0	0	0	0
	Percent HAL	%	%	.0%	%	%	%	%	%	.0%
Asian	Other	2	3	0	4	1	0	1	0	11
	HAL	1	0	1	0	0	0	0	0	2
	Percent HAL	33.3%	.0%	100.0%	.0%	.0%	%	.0%	%	15.4%
Black	Other	49	41	25	24	12	12	21	9	193
	HAL	34	39	42	12	6	0	1	0	134
	Percent HAL	41.0%	48.8%	62.7%	33.3%	33.3%	.0%	4.5%	.0%	41.0%
White	Other	336	342	266	218	139	117	112	84	1,614
	HAL	99	121	166	47	43	6	1	1	484
	Percent HAL	22.8%	26.1%	38.4%	17.7%	23.6%	4.9%	0.9%	01.2%	23.1%
Not Available	Other	13	10	10	8	7	6	9	7	70
	HAL	27	40	32	19	0	0	0	0	118
	Percent HAL	67.5%	80.0%	76.2%	70.4%	.0%	.0%	.0%	.0%	62.8%
Not Applicable	Other	1	0	0	0	0	0	0	0	1
	HAL	0	0	2	0	0	0	0	0	2
	Percent HAL	.0%	%	100.0%	%	%	%	%	%	67.0%
Total	Other	401	396	303	254	159	135	143	100	1,891
	HAL	161	200	243	78	49	6	2	1	740
	Percent HAL	28.6%	33.6%	44.5%	23.5%	23.6%	4.3%	1.4%	1.0%	28.1%
Non-Hispanic Ethnicity	Other	346	383	287	246	145	128	135	93	1,763
	HAL	123	151	212	64	47	6	1	1	605
	Percent HAL	26.2%	28.3%	42.5%	20.6%	24.5%	4.5%	.7%	1.1%	25.5%
Hispanic (Ethnicity)	Other	4	2	3	0	5	0	1	0	15
	HAL	2	0	1	1	0	0	0	0	4
	Percent HAL	33.3%	.0%	25.0%	100.0%	.0%	%	.0%	%	21.1%

Table 46.C.20
Rates of HALs by Income of Borrower
 46. City of Warren
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Average
\$15,000 or Below	36.4%	29.4%	50.0%	28.6%	100.0%	50.0%	.0%	.0%	36.4%
\$15,001–\$30,000	28.7%	38.0%	49.1%	36.8%	31.1%	5.7%	1.9%	3.8%	32.0%
\$30,001–\$45,000	31.7%	39.1%	49.2%	20.5%	20.0%	2.1%	2.0%	.0%	29.8%
\$45,001–\$60,000	27.3%	30.4%	36.6%	16.7%	23.3%	5.0%	.0%	.0%	25.1%
\$60,001–\$75,000	26.8%	16.3%	41.4%	17.9%	16.7%	.0%	.0%	.0%	21.1%
Above \$75,000	12.9%	23.6%	27.9%	3.4%	20.0%	.0%	0.0%	.0%	16.0%
Data Missing	35.7%	33.3%	27.3%	80.0%	.0%	.0%	%	.0%	34.0%
Average	28.6%	33.6%	44.5%	23.5%	23.6%	4.3%	1.4%	1.0%	28.1%

Table 46.C.21
Loans by HAL Status by Income of Borrower
 46. City of Warren
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Other	7	12	7	5	0	1	1	2	35
	HAL	4	5	7	2	1	1	0	0	20
	Percent HAL	36.4%	29.4%	50.0%	28.6%	100.0%	50.0%	.0%	.0%	36.4%
\$15,001–\$30,000	Other	122	111	85	55	42	50	51	25	541
	HAL	49	68	82	32	19	3	1	1	255
	Percent HAL	28.7%	38.0%	49.1%	36.8%	31.1%	5.7%	1.9%	3.8%	32.0%
\$30,001–\$45,000	Other	123	109	96	97	60	47	49	35	616
	HAL	57	70	93	25	15	1	1	0	262
	Percent HAL	31.7%	39.1%	49.2%	20.5%	20.0%	2.1%	2.0%	.0%	29.8%
\$45,001–\$60,000	Other	72	71	59	45	23	19	22	15	326
	HAL	27	31	34	9	7	1	0	0	109
	Percent HAL	27.3%	30.4%	36.6%	16.7%	23.3%	5.0%	.0%	.0%	25.1%
\$60,001–\$75,000	Other	41	41	17	23	15	6	9	9	161
	HAL	15	8	12	5	3	0	0	0	43
	Percent HAL	26.8%	16.3%	41.4%	17.9%	16.7%	.0%	.0%	.0%	21.1%
Above \$75,000	Other	27	42	31	28	16	11	11	13	179
	HAL	4	13	12	1	4	0	0	0	34
	Percent HAL	12.9%	23.6%	27.9%	3.4%	20.0%	.0%	.0%	.0%	16.0%
Data Missing	Other	9	10	8	1	3	1	0	1	33
	HAL	5	5	3	4	0	0	0	0	17
	Percent HAL	35.7%	33.3%	27.3%	80.0%	.0%	.0%	%	.0%	34.0%
Total	Other	401	396	303	254	159	135	143	100	1,891
	HAL	161	200	243	78	49	6	2	1	740
	Percent HAL	28.6%	33.6%	44.5%	23.5%	23.6%	4.3%	1.4%	1.0%	28.1%

D. CRA DATA

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

Table 46.D.1
Small Business Loans Originated: \$100,000 or Less by Tract MFI
 46. City of Warren
 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	141	196	109		470
2001	18	163	193	114		488
2002	46	209	272	133		660
2003	155	153	332	41		681
2004	123	161	305	74		663
2005	128	164	277	75		644
2006	135	171	359	78		743
2007	129	205	437	78		849
2008	105	170	306	70		651
2009	55	74	139	30		298
2010	63	81	136	30		310
2011	53	106	173	44		376
Total	1,034	1,798	3,125	876	0	6,833
Loan Amount (\$1,000s)						
2000	293	2,338	2,511	1,550		6,692
2001	285	2,291	2,463	1,748		6,787
2002	779	2,319	2,198	1,683		6,979
2003	1,489	1,638	3,149	431		6,707
2004	1,594	1,637	2,260	704		6,195
2005	1,580	1,721	2,187	644		6,132
2006	1,047	1,898	2,972	569		6,486
2007	1,357	2,297	3,304	694		7,652
2008	895	1,529	2,624	653		5,701
2009	832	1,155	1,668	263		3,918
2010	1,127	1,548	1,806	369		4,850
2011	1,284	1,652	3,070	773		6,779
Total	12,562	22,023	30,212	10,081	0	74,878

Table 46.D.2
Small Business Loans Originated: \$100,001 to \$250,000 by Tract MFI
 46. City of Warren
 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	5	16	9		31
2001	4	3	11	9		27
2002	1	11	9	9		30
2003	6	1	22	2		31
2004	8	4	15	2		29
2005	3	5	13	2		23
2006	7	4	8	1		20
2007	4	8	12	2		26
2008	2	4	7	0		13
2009	4	4	4	1		13
2010	3	6	7	2		18
2011	3	4	6	2		15
Total	46	59	130	41	0	276
Loan Amount (\$1,000s)						
2000	200	768	2,776	1,513		5,257
2001	770	505	1,787	1,343		4,405
2002	105	1,742	1,466	1,572		4,885
2003	890	118	3,522	383		4,913
2004	1,339	538	2,714	420		5,011
2005	382	736	2,455	310		3,883
2006	1,330	611	1,467	250		3,658
2007	582	1,060	2,333	297		4,272
2008	405	513	1,158	0		2,076
2009	850	603	670	138		2,261
2010	501	1,011	1,120	310		2,942
2011	634	688	1,204	311		2,837
Total	7,988	8,893	22,672	6,847	0	46,400

Table 46.D.3
Small Business Loans Originated: More than \$250,000 by Tract MFI
 46. City of Warren
 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	4	3	10		18
2001	1	2	6	20		29
2002	1	6	3	15		25
2003	6	4	9	9		28
2004	4	3	11	1		19
2005	5	4	14	5		28
2006	9	4	9	0		22
2007	1	2	7	0		10
2008	0	3	6	2		11
2009	2	5	6	0		13
2010	5	3	11	2		21
2011	2	3	13	1		19
Total	37	43	98	65	0	243
Loan Amount (\$1,000s)						
2000	990	2,147	2,175	6,022		11,334
2001	701	876	3,426	10,429		15,432
2002	300	2,280	1,150	7,207		10,937
2003	2,423	1,475	4,276	3,638		11,812
2004	1,499	1,600	6,167	650		9,916
2005	2,629	2,300	5,709	1,880		12,518
2006	4,383	2,227	3,933	0		10,543
2007	415	948	4,167	0		5,530
2008	0	1,387	2,482	875		4,744
2009	1,300	2,312	2,660	0		6,272
2010	2,930	1,387	4,646	930		9,893
2011	900	2,300	7,976	304		11,480
Total	18,470	21,239	48,767	31,935	0	120,411

Table 46.D.4
Small Business Loans to Businesses with Gross Annual Revenues of Less Than \$1 Million by Tract MFI
 46. City of Warren
 2000–2011 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	4	62	89	51		206
2001	5	67	77	69		218
2002	8	65	64	47		184
2003	43	36	112	14		205
2004	34	47	93	34		208
2005	58	78	118	45		299
2006	47	65	138	23		273
2007	34	84	151	22		291
2008	34	49	72	22		177
2009	12	19	42	6		79
2010	25	30	48	8		111
2011	25	35	58	17		135
Total	329	637	1,062	358	0	2,386
Loan Amount (\$1,000s)						
2000	1,072	3,206	3,116	3,532		10,926
2001	445	1,465	2,464	8,097		12,471
2002	482	3,399	2,535	7,842		14,258
2003	2,502	2,029	4,138	2,608		11,277
2004	1,820	1,482	4,713	1,284		9,299
2005	2,714	1,682	4,988	2,473		11,857
2006	2,144	1,499	3,911	164		7,718
2007	1,050	1,633	4,100	566		7,349
2008	866	764	1,497	663		3,790
2009	180	669	625	128		1,602
2010	981	916	2,757	616		5,270
2011	854	727	4,174	1,069		6,824
Total	15,110	19,471	39,018	29,042	0	102,641

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 46.E.1
Fair Housing Complaints by Basis
 46. City of Warren
 2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color		1			1	1		1		4
Disability			2	1	1			1		5
Family Status					1	2				3
Race	1	2	1		1	2	1	1		9
Religion					1					1
Sex						1				1
Total Bases	1	3	3	1	5	6	1	3		23
Total Complaints	1	2	3	1	2	4	1	2		16

Table 46.E.2
Fair Housing Complaints by Issue
 46. City of Warren
 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	2		1	7
Otherwise deny or make housing available				1					2	3
Discriminatory terms, conditions, privileges, or services and facilities			1						1	2
Discriminatory refusal to sell				1						1
Discriminatory refusal to negotiate for sale						1				1
Discriminatory refusal to rent						1				1
Discriminatory refusal to negotiate for rental								1		1
Discriminatory refusal to rent and negotiate for rental								1		1
Discriminatory advertising, statements, and notices						1				1
Discriminatory advertisement - rental						1				1
False denial or representation of availability - rental						1				1
Failure to make reasonable accommodation				1						1
Total Issues	1	2	4	1	2	5	1	5	0	21
Total Complaints	1	2	3	1	2	4	1	2		16

Table 46.E.3
Fair Housing Complaints by Closure Status
 46. City of Warren
 2004–2012 HUD Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Administrative Closure			1			2	1	1		5
Conciliated / Settled		1		1	1			1		4
No Cause	1	1	2		1	2				7
Total Complaints	1	2	3	1	2	4	1	2		16

HUD Complaints Found With Cause

Table 46.E.4
Fair Housing Complaints Found With Cause by Basis
 46. City of Warren
 2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color		1								1
Disability				1				1		2
Family Status					1					1
Race		1								1
Total Bases		2		1	1			1		5
Total Complaints		1		1	1			1		4

Table 46.E.5
Fair Housing Complaints Found With Cause by Issue
 46. City of Warren
 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	1				2
Otherwise deny or make housing available			1					1		2
Discriminatory refusal to rent and negotiate for rental								1		1
Total Issues	0	1	0	1	1	0	0	2	0	5
Total Complaints		1		1	1			1		4

OHIO CIVIL RIGHTS COMMISSION COMPLAINTS

Table 46.E.6
Fair Housing Complaints by Basis
 46. City of Warren
 2004–2012 OCRRC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color					1			1		2
Disability		1	4	1	1		1	1		9
Family Status					1		1			2
Gender		1				1		1		3
Race	3	1	1	1	1	1	1	1		10
Religion					1					1
Retaliation		1					1			2
Total Bases	3	4	5	2	5	2	4	4	0	29
Total Complaints	3	2	5	2	3	2	2	3		22

Table 46.E.7
Fair Housing Complaints by Issue
 46. City of Warren
 2004–2012 OCRRC Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Intimidation					1					1
Other	1	1			2	1	1	1		7
Reasonable Accommodation			3	1						4
Sexual Harassment						1				1
Terms and Conditions	2	1	3	2			1	2		11
Total Issues	3	2	6	3	3	2	2	3	0	24
Total Complaints	3	2	5	2	3	2	2	3		22

Table 46.E.8
Fair Housing Complaints by Closure Status
 46. City of Warren
 2004–2012 OCRRC Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
CP Failed to Cooperate			1					1		2
CP Withdrawal – No Benefit							1			1
No Cause Finding Issued	2	1	3		1	1	1	1		10
Settlement With Benefits			1	1	1	1		1		5
Withdrawal With Benefits		1		1	1					3
Missing	1									1
Total Complaints	3	2	5	2	3	2	2	3	0	22

FAIR HOUSING CONTACT SERVICE COMPLAINTS

Table 46.E.9
Fair Housing Complaints by Basis
 46. City of Warren
 2004–2012 FHCS Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color					1					1
Disability			1		1	1			1	4
Familial Status					3					3
Race					1	1				2
Unknown				1						1
Total Bases	0	0	1	1	6	2	0	0	1	11
Total Complaints			1	1	4	2			1	9

Table 46.E.10
Fair Housing Complaints by Closure Status
 46. City of Warren
 2004–2012 FHCS Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Closed				1		2				3
Inquiry									1	1
Lack of jurisdiction					3					3
No probable cause					1					1
Pending			1							1
Probable cause										0
Total Complaints	0	0	1	1	4	2	0	0	1	9

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 46.F.1

Primary Role of Respondent

46. City of Warren
2012–2013 Fair Housing Survey for Housing
Stakeholders Data

Primary Role	Total
Advocate/Service Provider	3
Condo or Homeowner Association Leader	1
Construction/Development	2
Local Government	3
Property Management	1
Real Estate	9
Resident Advisory Council Leader	3
Other Role	2
Total	24

FEDERAL, STATE, AND LOCAL LAWS

Table 46.F.2

**Familiarity with Fair
Housing Laws**

46. City of Warren
2012–2013 Fair Housing Survey
for Housing Stakeholders Data

Familiarity	Total
Not Familiar	3
Somewhat Familiar	8
Very Familiar	5
Missing	8
Total	24

Table 46.F.3

Perceptions About Fair Housing Laws

46. City of Warren
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?	13	3	1	7	24
Are fair housing laws difficult to understand or follow?	5	10	2	7	24
Do you think fair housing laws should be changed?	3	9	5	7	24
Do you think fair housing laws are adequately enforced?	9	8		7	24

Table 46.F.4
Fair Housing Activities

46. City of Warren
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?		9	8		7	24
Have you participated in fair housing training?		9	1		14	24
Are you aware of any fair housing testing?			10	7	7	24
Testing and education	Too Little	Right Amount	Too Much	Don't Know	Missing	Total
Is there sufficient outreach and education activity?	6	3		8	7	24
Is there sufficient testing?	3	1		13	7	24

Table 46.F.5

Protected Classes

46. City of Warren
2012–2013 Fair Housing Survey
for Housing Stakeholders Data

Protected Class	Total
Family Status	9
Religion	9
Gender	7
National Origin	7
Color	5
Sexual Orientation	3
Age	2
Military	3
Disability	2
Ancestry	3
Race	2
Other	4
Total	56

Table 46.F.6

Fair Housing Violation Referrals

46. City of Warren
2012–2013 Fair Housing Survey for Housing Stakeholders Data

Referral	Total
Board of Realtors	1
City	1
Don't Know	2
Greater Warren-Youngstown Urban League	3
HUD	5
Lawyer	2
Ohio Division of Real Estate and Professional Licensing	2
Other	3
Total	19

LOCAL FAIR HOUSING

Table 46.F.7

Local Fair Housing

46. City of Warren

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	6	5	9	24
Are there any specific geographic areas that have fair housing problems?	2	1	12	9	24
Are there any specific groups in that face housing discrimination?	3	2	9	10	24

FAIR HOUSING IN THE PRIVATE SECTOR

Table 46.F.8

Barriers to Fair Housing in the Private Sector

46. City of Warren

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	10	4	8	24
The real estate industry?	1	10	5	8	24
The mortgage and home lending industry?	2	7	7	8	24
The housing construction or accessible housing design fields?	1	8	7	8	24
The home insurance industry?	1	8	7	8	24
The home appraisal industry?	1	8	7	8	24
Any other housing services?	1	9	6	8	24

FAIR HOUSING IN THE PUBLIC SECTOR

Table 46.F.9

Barriers to Fair Housing in the Public Sector

46. City of Warren

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	12	2	9	24
Zoning laws?	1	8	6	9	24
Occupancy standards or health and safety codes?	3	7	6	8	24
Property tax policies?	3	7	6	8	24
Permitting process?	1	8	7	8	24
Housing construction standards?	2	6	8	8	24
Neighborhood or community development policies?	3	7	6	8	24
Limited access to government services, such as employment services?	6	8	2	8	24
Public administrative actions or regulations?	1	7	7	9	24

NARRATIVE COMMENTS

Federal, State, and Local Laws

Table 46.F.10

How did you become aware of fair housing laws?

46. City of Warren

2013 Fair Housing Survey Data

Comments:
25 years in HUD rental programs I am part of the Trumbull Housing Collaborative and I am a homeless outreach worker Our agency participates on the local Housing Collaborative.

personal experiences
 Real estate agent/Broker fro the last 30 years
 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

Table 46.F.11
How should fair housing laws be changed?

46. City of Warren
 2013 Fair Housing Survey Data

Comments:
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.

Local Fair Housing

Table 46.F.12
Are there any specific geographic areas that have fair housing problems?

46. City of Warren
 2013 Fair Housing Survey Data

Comments:
The third ward. The rich class has very few medium housing rentals if any at all. yes, limits need to be placed on rental units. they are priced at above 45% of the average household income.

Table 46.F.13
Are there any specific groups in that face housing discrimination?

46. City of Warren
 2013 Fair Housing Survey Data

Comments:
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. Individuals with mental illness and those who have a criminal background low income, convicted felons, other than registered sex offenders unemployed out of work - no rentals or not enough

Fair Housing in the Private Sector**Table 46.F.14****Are you aware of any questionable practices or barriers to fair housing choice in the rental housing market?**46. City of Warren
2013 Fair Housing Survey Data

Comments:
color When employed we referred to the proper organizations and if they were politically connected we would be directed NOT to do it..

Table 46.F.15**Are you aware of any questionable practices or barriers to fair housing choice in the real estate industry?**46. City of Warren
2013 Fair Housing Survey Data

Comments:
All too common practice even today.

Table 46.F.16**Are you aware of any questionable practices or barriers to fair housing choice in the mortgage and home lending industry?**46. City of Warren
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" Probable to minorities or others with large families.

Table 46.F.17**Are you aware of any questionable practices or barriers to fair housing choice in the housing construction or accessible housing design fields?**46. City of Warren
2013 Fair Housing Survey Data

Comments:
Sometimes the building code doesn't work. Sometimes there are NIMBYS that have too much influence.

Table 46.F.18**Are you aware of any questionable practices or barriers to fair housing choice in any other housing services?**46. City of Warren
2013 Fair Housing Survey Data

Comments:
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 46.F.19****Are you aware of any questionable practices or barriers to fair housing choice in land use policies?**46. City of Warren
2013 Fair Housing Survey Data

Comments:
Violent NYMBIS have been the rule in the past and present. There have been marches currently in 2012 in Warren against elderly housing units.

Table 46.F.20**Are you aware of any questionable practices or barriers to fair housing choice in occupancy standards or health and safety codes?**

46. City of Warren
2013 Fair Housing Survey Data

Comments:
Code enforcement rarely occurs here Probably decades out of date. 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 46.F.21**Are you aware of any questionable practices or barriers to fair housing choice in property tax policies?**

46. City of Warren
2013 Fair Housing Survey Data

Comments:
Lack of tax incentives for making home improvements Republicans have run Ohio for too long to update them. Septic

Table 46.F.22**Are you aware of any questionable practices or barriers to fair housing choice in the permitting process?**

46. City of Warren
2013 Fair Housing Survey Data

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

Table 46.F.23**Are you aware of any questionable practices or barriers to fair housing choice in housing construction standards?**

46. City of Warren
2013 Fair Housing Survey Data

Comments:
Septic? State and National Building codes, probably a versions behind.

Table 46.F.24**Are you aware of any questionable practices or barriers to fair housing choice in neighborhood or community development policies?**

46. City of Warren
2013 Fair Housing Survey Data

Comments:
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. 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 46.F.25**Are you aware of any barriers that limit access to government services, such as a lack of transportation or employment services?**

46. City of Warren
2013 Fair Housing Survey Data

Comments:
<p>Public transportation is limited 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.</p>

Table 46.F.26**Are you aware of any questionable practices or barriers to fair housing choice in any other public administrative actions or regulations?**

46. City of Warren
2013 Fair Housing Survey Data

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

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 46.G.1
Housing Development
 46. City of Warren
 2012 Land Use Planning Interview Data

Question: Does your jurisdiction...	Response
Housing Development	
Have a definition for the term "dwelling unit"?	No
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?	No
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?	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 Warren. 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 Warren.

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 Warren.

Results of the Fair Housing Surveys indicate that the City may not have sufficient policies or practices to completely address the duty to affirmatively further fair housing.

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 City of Warren. 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 for-profit, non-profit, and 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. Warren has not been able to escape this historical context.

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 in Warren. 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 46.H.1
Impediments Matrix
 46. City of Warren
 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 ⁷⁹		
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			All	L
5	Lack of inclusionary policies							X			All	L

⁷⁹ 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.

47. REMAINDER OF TRUMBULL COUNTY

A. CENSUS BUREAU DATA

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

Table 47.A.1

Population by Age

47. Remainder of Trumbull County
2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Under 5	10,072	5.6%	8,756	5.2%	-13.1%
5 to 19	36,781	20.6%	32,054	19.0%	-12.9%
20 to 24	9,038	5.1%	8,755	5.2%	-3.1%
25 to 34	21,195	11.9%	16,842	10.0%	-20.5%
35 to 54	55,043	30.9%	47,065	27.9%	-14.5%
55 to 64	18,580	10.4%	25,302	15.0%	36.2%
65 or Older	27,575	15.5%	29,970	17.8%	8.7%
Total	178,284	100.0%	168,744	100.0%	-5.4%

Table 47.A.2

Elderly Population by Age

47. Remainder of Trumbull County
2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
65 to 66	3,029	11.0%	3,626	12.1%	19.7%
67 to 69	4,370	15.8%	5,217	17.4%	19.4%
70 to 74	7,144	25.9%	6,806	22.7%	-4.7%
75 to 79	6,228	22.6%	5,436	18.1%	-12.7%
80 to 84	4,021	14.6%	4,599	15.3%	14.4%
85 or Older	2,783	10.1%	4,286	14.3%	54.0%
Total	27,575	100.0%	29,970	100.0%	8.7%

Table 47.A.3

Population by Race and Ethnicity

47. Remainder of Trumbull County
2000 & 2010 Census SF1 Data

Race	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
White	169,394	95.0%	158,989	94.2%	-6.1%
Black	5,976	3.4%	5,895	3.5%	-1.4%
American Indian	271	.2%	264	.2%	-2.6%
Asian	819	.5%	818	.5%	-.1%
Native Hawaiian/ Pacific Islander	18	.0%	35	.0%	94.4%
Other	330	.2%	397	.2%	20.3%
Two or More Races	1,476	.8%	2,346	1.4%	58.9%
Total	178,284	100.0%	168,744	100.0%	-5.4%
Non-Hispanic	176,975	99.3	166,740	98.8%	-5.8%
Hispanic	1,309	.7%	2,004	1.2%	53.1%

Table 47.A.4**Disability by Age**47. Remainder of Trumbull County
2010 Three-Year ACS Data

Age	Male		Female		Total	
	Disabled Population	Disability Rate	Disabled Population	Disability Rate	Disabled Population	Disability Rate
Under 5	-56	-2.2%	-20	-1.1%	-76	-1.7%
5 to 17	274	3.3%	-265	-3.2%	9	.1%
18 to 34	695	9.1%	-58	-.8%	637	4.2%
35 to 64	1,969	8.2%	1,976	7.9%	3,945	8.1%
65 to 74	1,535	29.2%	867	17.2%	2,402	23.3%
75 or Older	1,334	43.1%	1,969	43.6%	3,303	43.4%
Total	5,751	11.3%	4,469	8.5%	10,220	9.9%

Table 47.A.5**Employment Status by Disability and Type: Age 18 to 64**47. Remainder of Trumbull County
2010 Three-Year ACS Data

Disability Status	Population
Employed:	47,969
With a disability:	1,141
With a hearing difficulty	219
With a vision difficulty	-100
With a cognitive difficulty	642
With an ambulatory difficulty	671
With a self-care difficulty	207
With an independent living difficulty	89
No disability	46,828
Unemployed:	1,532
With a disability:	23
With a hearing difficulty	164
With a vision difficulty	-94
With a cognitive difficulty	-23
With an ambulatory difficulty	-206
With a self-care difficulty	-87
With an independent living difficulty	-107
No disability	1,509
Not in labor force:	14,691
With a disability:	3,418
With a hearing difficulty	613
With a vision difficulty	128
With a cognitive difficulty	1,446
With an ambulatory difficulty	2,096
With a self-care difficulty	980
With an independent living difficulty	1,458
No disability	11,273
Total	64,192

Table 47.A.6**Households by Income**47. Remainder of Trumbull 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	9,576	13.7%	9,191	13.2%
\$15,000 to \$19,999	4,957	7.1%	4,156	6.0%
\$20,000 to \$24,999	4,936	7.1%	4,629	6.6%
\$25,000 to \$34,999	9,616	13.8%	8,657	12.4%
\$35,000 to \$49,999	12,811	18.4%	11,755	16.8%
\$50,000 to \$74,999	15,015	21.5%	14,539	20.8%
\$75,000 to \$99,999	7,101	10.2%	8,568	12.3%
\$100,000 or More	5,677	8.1%	8,332	11.9%
Total	69,689	100.0%	69,827	100.0%

Table 47.A.7**Poverty by Age**47. Remainder of Trumbull 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	1,727	12.4%	2,059	10.2%
6 to 17	3,129	22.4%	4,765	23.7%
18 to 64	7,273	52.2%	11,280	56.2%
65 or Older	1,812	13.0%	1,985	9.9%
Total	13,941	100.0%	20,089	100.0%
Poverty Rate	8.0%	.	11.9%	.

Table 47.A.8**Households by Year Home Built**47. Remainder of Trumbull 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	13,236	19.0%	12,080	17.3%
1940 to 1949	5,984	8.6%	5,384	7.7%
1950 to 1959	12,035	17.3%	12,475	17.9%
1960 to 1969	10,461	15.0%	9,584	13.7%
1970 to 1979	14,637	21.0%	14,077	20.2%
1980 to 1989	6,074	8.7%	5,482	7.9%
1990 to 1999	7,293	10.5%	6,834	9.8%
2000 to 2004	.	.	3,055	4.4%
2005 or Later	.	.	856	1.2%
Total	69,720	100.0%	69,827	100.0%

Table 47.A.9**Housing Units by Type**47. Remainder of Trumbull 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	57,483	77.9%	60,061	79.1%
Duplex	3,201	4.3%	3,361	4.4%
Tri- or Four-Plex	1,841	2.5%	1,846	2.4%
Apartment	5,976	8.1%	5,859	7.7%
Mobile Home	5,247	7.1%	4,763	6.3%
Boat, RV, Van, Etc.	18	.0%	0	.0%
Total	73,766	100.0%	75,890	100.0%

Table 47.A.10**Housing Units by Tenure**47. Remainder of Trumbull County
2000 & 2010 Census SF1 Data

Tenure	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
Occupied Housing Units	69,732	94.4%	69,004	91.1%	-1.0%
Owner-Occupied	54,838	78.6%	52,783	76.5%	-3.7%
Renter-Occupied	14,894	21.4%	16,221	23.5%	8.9%
Vacant Housing Units	4,105	5.6%	6,771	8.9%	64.9%
Total Housing Units	73,837	100.0%	75,775	100.0%	2.6%

Table 47.A.11**Disposition of Vacant Housing Units**47. Remainder of Trumbull County
2000 & 2010 Census SF1 Data

Disposition	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
For Rent	1,645	40.1%	2,183	32.2%	32.7%
For Sale	817	19.9%	1,284	19.0%	57.2%
Rented or Sold, Not Occupied	790	19.2%	411	6.1%	-48.0%
For Seasonal, Recreational, or Occasional Use	342	8.3%	432	6.4%	26.3%
For Migrant Workers	1	0.0%	0	.0%	-100.0%
Other Vacant	510	12.4%	2,461	36.3%	382.5%
Total	4,105	100.0%	6,771	100.0%	64.9%

Table 47.A.12**Households by Household Size**47. Remainder of Trumbull County
2000 & 2010 Census SF1 Data

Size	2000 Census		2010 Census		% Change 00-10
	Households	% of Total	Households	% of Total	
One Person	17,578	25.2%	19,042	27.6%	8.3%
Two Persons	24,107	34.6%	24,872	36.0%	3.2%
Three Persons	12,015	17.2%	11,170	16.2%	-7.0%
Four Persons	9,928	14.2%	8,238	11.9%	-17.0%
Five Persons	4,135	5.9%	3,559	5.2%	-13.9%
Six Persons	1,264	1.8%	1,283	1.9%	1.5%
Seven Persons or More	705	1.0%	840	1.2%	19.1%
Total	69,732	100.0%	69,004	100.0%	-1.0%

Table 47.A.13

Household Type by Tenure
47. Remainder of Trumbull County
2000 & 2010 Census SF1 Data

Household Type	2000 Census		2010 Census		% Change 00–10
	Households	% of Total	Households	% of Total	
Family Households	49,613	71.1%	46,857	67.9%	-5.6%
Married-Couple Family	39,653	79.9%	35,329	75.4%	-10.9%
Owner-Occupied	35,623	89.8%	31,628	89.5%	-11.2%
Renter-Occupied	4,030	10.2%	3,701	10.5%	-8.2%
Other Family	9,960	20.1%	11,528	24.6%	15.7%
Male Householder, No Spouse	2,599	26.1%	3,360	29.1%	29.3%
Owner-Occupied	1,849	71.1%	2,369	70.5%	28.1%
Renter-Occupied	750	28.9%	991	29.5%	32.1%
Female Householder, No Spouse	7,361	73.9%	8,168	70.9%	11.0%
Owner-Occupied	4,751	64.5%	4,814	58.9%	1.3%
Renter-Occupied	2,610	35.5%	3,354	41.1%	28.5%
Non-Family Households	20,119	28.9%	22,147	32.1%	10.1%
Owner-Occupied	12,615	62.7%	13,972	63.1%	10.8%
Renter-Occupied	7,504	37.3%	8,175	36.9%	8.9%
Total	69,732	100.0%	69,004	100.0%	-1.0%

Table 47.A.14

Group Quarters Population
47. Remainder of Trumbull 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	1,402	50.2%	0	.0%	-100.0%
Juvenile Facilities	.	.	18	1.6%	.
Nursing Homes	1,346	48.2%	1,116	98.4%	-17.1%
Other Institutions	46	1.6%	0	.0%	-100.0%
Total	2,794	100.0%	1,134	100.0%	-59.4%
Noninstitutionalized					
College Dormitories	0	.0%	0	.0%	%
Military Quarters	0	.0%	0	.0%	%
Other Noninstitutional	133	100.0%	170	100.0%	27.8%
Total	133	4.5%	170	13.0%	27.8%
Total Group Quarters Population	2,927	100.0%	1,304	100.0%	-55.4%

Table 47.A.15

Overcrowding and Severe Overcrowding
47. Remainder of Trumbull 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	54,221	98.9%	495	.9%	97	.2%	54,813
2010 ACS	54,477	99.1%	434	.8%	43	.1%	54,954
Renter							
2000 Census	14,492	97.2%	340	2.3%	75	.5%	14,907
2010 ACS	14,634	98.4%	199	1.3%	40	.3%	14,873
Total							
2000 Census	68,713	98.6%	835	1.2%	172	.2%	69,720
2010 ACS	69,111	99.0%	633	.9%	83	.1%	69,827

Table 47.A.16
Households with Incomplete Plumbing Facilities
 47. Remainder of Trumbull County
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Plumbing Facilities	69,488	69,644
Lacking Complete Plumbing Facilities	232	183
Total Households	69,720	69,827
Percent Lacking	.3%	.3%

Table 47.A.17
Households with Incomplete Kitchen Facilities
 47. Remainder of Trumbull County
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Kitchen Facilities	69,366	69,224
Lacking Complete Kitchen Facilities	354	603
Total Households	69,720	69,827
Percent Lacking	.5%	.9%

Table 47.A.18
Cost Burden and Severe Cost Burden by Tenure
 47. Remainder of Trumbull 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	22,288	79.7%	3,684	13.2%	1,893	6.8%	86	.3%	27,951
2010 ACS	22,832	69.8%	6,033	18.4%	3,685	11.3%	175	.5%	32,725
Owner Without a Mortgage									
2000 Census	16,329	91.4%	837	4.7%	451	2.5%	249	1.4%	17,866
2010 ACS	18,991	85.4%	2,051	9.2%	1,012	4.6%	175	.8%	22,229
Renter									
2000 Census	8,814	60.5%	2,409	16.5%	1,957	13.4%	1,399	9.6%	14,579
2010 ACS	7,428	49.9%	2,943	19.8%	3,209	21.6%	1,293	8.7%	14,873
Total									
2000 Census	47,431	78.5%	6,930	11.5%	4,301	7.1%	1,734	2.9%	60,396
2010 ACS	49,251	70.5%	11,027	15.8%	7,906	11.3%	1,643	2.4%	69,827

Table 47.A.19
Median Housing Costs
 47. Remainder of Trumbull County
 2000 Census SF3 & 2010 Five-Year ACS Data

Housing Cost	2000 Census	2010 ACS
Median Contract Rent	\$26	\$13
Median Home Value	\$22,100	\$30,300

B. BLS DATA

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

Table 47.B.1
Labor Force Statistics
 47. Remainder of Trumbull County
 1990–2011 BLS Data

Year	Labor Force	Employment	Unemployment	Unemployment Rate	Statewide Unemployment Rate
1990	87,596	81,852	5,744	6.6%	5.7%
1991	87,941	81,922	6,019	6.8%	6.6%
1992	89,519	81,704	7,815	8.7%	7.4%
1993	88,546	81,878	6,668	7.5%	6.7%
1994	88,979	83,168	5,811	6.5%	5.6%
1995	90,002	84,878	5,124	5.7%	4.9%
1996	89,326	84,467	4,859	5.4%	5.0%
1997	89,806	85,459	4,347	4.8%	4.6%
1998	90,151	85,477	4,674	5.2%	4.3%
1999	89,396	85,280	4,116	4.6%	4.3%
2000	87,344	83,493	3,851	4.4%	4.0%
2001	86,669	81,934	4,735	5.5%	4.4%
2002	86,181	80,942	5,239	6.1%	5.7%
2003	86,652	80,276	6,376	7.4%	6.2%
2004	85,614	79,347	6,267	7.3%	6.1%
2005	85,697	80,084	5,613	6.5%	5.9%
2006	86,049	80,865	5,184	6.0%	5.4%
2007	85,935	80,715	5,220	6.1%	5.6%
2008	85,557	79,354	6,203	7.3%	6.5%
2009	86,961	75,319	11,642	13.4%	10.1%
2010	85,599	75,591	10,008	11.7%	10.0%
2011	83,859	76,008	7,851	9.4%	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.⁸⁰ The information presented in this section presents detailed HMDA data, including denial rates and predatory lending including high annual percentage rate (APR) loans.

Table 47.C.1

Purpose of Loan by Year
47. Remainder of Trumbull County
2004–2011 HMDA Data

Purpose	2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	3,870	4,414	4,045	3,046	2,133	1,751	1,614	1,644	22,517
Home Improvement	1,489	1,845	1,583	1,411	980	494	463	388	8,653
Refinancing	10,072	10,304	8,826	6,646	4,527	4,862	4,699	3,890	53,826
Total	15,431	16,563	14,454	11,103	7,640	7,107	6,776	5,922	84,996

Table 47.C.2

Occupancy Status for Home Purchase Loan Applications
47. Remainder of Trumbull County
2004–2011 HMDA Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	Total
Owner-Occupied	3,586	4,072	3,750	2,817	1,995	1,647	1,547	1,530	20,944
Not Owner-Occupied	238	286	272	194	133	101	66	111	1,401
Not Applicable	46	56	23	35	5	3	1	3	172
Total	3,870	4,414	4,045	3,046	2,133	1,751	1,614	1,644	22,517

Table 47.C.3

Owner-Occupied Home Purchase Loan Applications by Loan Type
47. Remainder of Trumbull County
2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Conventional	3,079	3,682	3,382	2,398	1,105	756	685	659	15,746
FHA - Insured	441	323	308	351	798	719	713	704	4,357
VA - Guaranteed	58	61	59	63	67	85	72	89	554
Rural Housing Service or Farm Service Agency	8	6	1	5	25	87	77	78	287
Total	3,586	4,072	3,750	2,817	1,995	1,647	1,547	1,530	20,944

⁸⁰ 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 47.C.4
Loan Applications by Action Taken
 47. Remainder of Trumbull County
 2004–2011 HMDA Data

Action	2004	2005	2006	2007	2008	2009	2010	2011	Total
Loan Originated	2,122	2,297	2,047	1,600	1,105	816	828	761	11,576
Application Approved but not Accepted	238	312	253	168	103	59	60	46	1,239
Application Denied	390	514	530	397	290	204	193	194	2,712
Application Withdrawn by Applicant	276	317	224	146	109	91	61	62	1,286
File Closed for Incompleteness	60	64	57	48	15	15	10	21	290
Loan Purchased by the Institution	500	561	636	452	371	462	395	446	3,823
Preapproval Request Denied	0	7	3	6	2	0	0	0	18
Preapproval Approved but not Accepted	0	0	0	0	0	0	0	0	0
Total	3,586	4,072	3,750	2,817	1,995	1,647	1,547	1,530	20,944
Denial Rate	15.5%	18.3%	20.6%	19.9%	20.8%	20.0%	18.9%	20.3%	19.0%

Table 47.C.5
Denial Rates by Gender of Applicant
 47. Remainder of Trumbull County
 2004–2011 HMDA Data

Year	Male	Female	Not Available	Not Applicable	Average
2004	13.8%	16.5%	42.1%	%	15.5%
2005	15.8%	22.2%	32.7%	%	18.3%
2006	18.3%	24.4%	30.6%	%	20.6%
2007	17.4%	23.8%	39.4%	%	19.9%
2008	19.1%	24.2%	22.9%	100.0%	20.8%
2009	18.4%	23.5%	20.9%	%	20.0%
2010	18.8%	18.3%	25.0%	%	18.9%
2011	20.7%	18.9%	22.7%	%	20.3%
Average	17.1%	21.7%	31.1%	100.0%	19.0%

Table 47.C.6
Loan Applications by Selected Action Taken by Gender of Applicant
 47. Remainder of Trumbull County
 2004–2011 HMDA Data

Gender		2004	2005	2006	2007	2008	2009	2010	2011	Total
Male	Originated	1,550	1,597	1,418	1,156	747	547	572	521	8,108
	Denied	248	299	317	244	176	123	132	136	1,675
	Denial Rate	13.8%	15.8%	18.3%	17.4%	19.1%	18.4%	18.8%	20.7%	17.1%
Female	Originated	517	624	543	401	294	235	223	206	3,043
	Denied	102	178	175	125	94	72	50	48	844
	Denial Rate	16.5%	22.2%	24.4%	23.8%	24.2%	23.5%	18.3%	18.9%	21.7%
Not Available	Originated	55	76	86	43	64	34	33	34	425
	Denied	40	37	38	28	19	9	11	10	192
	Denial Rate	42.1%	32.7%	30.6%	39.4%	22.9%	20.9%	25.0%	22.7%	31.1%
Not Applicable	Originated	0	0	0	0	0	0	0	0	0
	Denied	0	0	0	0	1	0	0	0	1
	Denial Rate	%	%	%	%	100.0%	%	%	%	100.0%
Total	Originated	2,122	2,297	2,047	1,600	1,105	816	828	761	11,576
	Denied	390	514	530	397	290	204	193	194	2,712
	Denial Rate	15.5%	18.3%	20.6%	19.9%	20.8%	20.0%	18.9%	20.3%	19.0%

Table 47.C.7
Denial Rates by Race/Ethnicity of Applicant
 47. Remainder of Trumbull County
 2004–2011 HMDA Data

Race/Ethnicity	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	.0%	.0%	25.0%	.0%	.0%	.0%	.0%	66.7%	12.5%
Asian	10.0%	9.1%	26.7%	.0%	.0%	.0%	11.1%	20.0%	12.7%
Black	22.4%	25.0%	31.8%	26.5%	42.4%	13.8%	18.5%	37.5%	27.2%
White	13.8%	16.8%	18.6%	18.2%	19.5%	20.2%	18.2%	19.0%	17.6%
Not Available	36.9%	28.3%	34.2%	45.9%	29.4%	21.4%	31.1%	29.5%	32.6%
Not Applicable	.0%	%	%	%	100.0%	0%	0%	%	33.3%
Average	15.5%	18.3%	20.6%	19.9%	20.8%	20.0%	18.9%	20.3%	19.0%
Non-Hispanic	13.6%	16.8%	19.5%	18.2%	20.5%	19.4%	17.7%	19.8%	17.8%
Hispanic	20.0%	32.3%	5.6%	22.2%	14.3%	62.5%	37.5%	11.1%	24.4%

Table 47.C.8
Loan Applications by Selected Action Taken by Race/Ethnicity of Applicant
 47. Remainder of Trumbull County
 2004–2011 HMDA Data

Race		2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Originated	4	3	3	3	3	2	2	1	21
	Denied	0	0	1	0	0	0	0	2	3
	Denial Rate	.0%	.0%	25.0%	.0%	.0%	.0%	.0%	66.7%	12.5%
Asian	Originated	9	10	11	9	1	3	8	4	55
	Denied	1	1	4	0	0	0	1	1	8
	Denial Rate	10.0%	9.1%	26.7%	.0%	.0%	.0%	11.1%	20.0%	12.7%
Black	Originated	52	66	60	36	19	25	22	15	295
	Denied	15	22	28	13	14	4	5	9	110
	Denial Rate	22.4%	25.0%	31.8%	26.5%	42.4%	13.8%	18.5%	37.5%	27.2%
White	Originated	1,949	1,990	1,819	1,492	1,010	742	754	698	10,454
	Denied	312	401	417	333	245	188	168	164	2,228
	Denial Rate	13.8%	16.8%	18.6%	18.2%	19.5%	20.2%	18.2%	19.0%	17.6%
Not Available	Originated	106	228	154	60	72	44	42	43	749
	Denied	62	90	80	51	30	12	19	18	362
	Denial Rate	36.9%	28.3%	34.2%	45.9%	29.4%	21.4%	31.1%	29.5%	32.6%
Not Applicable	Originated	2	0	0	0	0	0	0	0	2
	Denied	0	0	0	0	1	0	0	0	1
	Denial Rate	36.9%	28.3%	34.2%	45.9%	29.4%	21.4%	31.1%	29.5%	33.3%
Total	Originated	2,122	2,297	2,047	1,600	1,105	816	828	761	11,576
	Denied	390	514	530	397	290	204	193	194	2,712
	Denial Rate	15.5%	18.3%	20.6%	19.9%	20.8%	20.0%	18.9%	20.3%	19.0%
Non-Hispanic	Originated	1,788	2,040	1,876	1,519	1,019	764	778	709	10,493
	Denied	281	413	453	337	262	184	167	175	2,272
	Denial Rate	13.6%	16.8%	19.5%	18.2%	20.5%	19.4%	17.7%	19.8%	17.8%
Hispanic	Originated	16	21	17	14	6	3	5	8	90
	Denied	4	10	1	4	1	5	3	1	29
	Denial Rate	20.0%	32.3%	5.6%	22.2%	14.3%	62.5%	37.5%	11.1%	24.4%

Table 47.C.9
Loan Applications by Reason for Denial
 47. Remainder of Trumbull County
 2004–2011 HMDA Data

Denial Reason	2004	2005	2006	2007	2008	2009	2010	2011	Total
Debt-to-Income Ratio	45	53	61	43	38	33	35	31	339
Employment History	3	4	5	4	4	7	5	4	36
Credit History	103	99	82	89	52	47	55	43	570
Collateral	32	35	44	32	34	27	43	19	266
Insufficient Cash	7	10	10	6	8	4	1	7	53
Unverifiable Information	10	16	18	11	6	5	2	4	72
Credit Application Incomplete	22	32	39	50	42	41	16	36	278
Mortgage Insurance Denied	0	1	2	0	2	1	1	1	8
Other	70	107	65	26	20	11	8	11	318
Missing	98	157	204	136	84	28	27	38	772
Total	390	514	530	397	290	204	193	194	2,712

Table 47.C.10
Denial Rates by Income of Applicant
 47. Remainder of Trumbull County
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	55.0%	64.9%	52.5%	45.5%	36.7%	41.2%	47.6%	65.0%	51.0%
\$15,001–\$30,000	20.8%	25.4%	29.7%	25.4%	27.8%	28.3%	24.3%	24.1%	25.6%
\$30,001–\$45,000	16.4%	18.3%	21.3%	21.3%	25.4%	18.1%	22.1%	21.2%	20.1%
\$45,001–\$60,000	14.4%	16.3%	18.1%	18.6%	19.2%	17.1%	21.1%	14.8%	17.2%
\$60,001–\$75,000	10.5%	16.3%	17.0%	16.9%	13.2%	10.8%	7.4%	22.3%	14.7%
Above \$75,000	7.7%	12.4%	11.6%	13.5%	11.2%	18.0%	9.8%	13.8%	11.7%
Data Missing	29.3%	16.9%	33.9%	19.2%	33.3%	30.8%	33.3%	38.5%	27.0%
Total	15.5%	18.3%	20.6%	19.9%	20.8%	20.0%	18.9%	20.3%	19.0%

Table 47.C.11
Denial Rates of Loans by Race/Ethnicity and Income of Applicant
 47. Remainder of Trumbull County
 2004–2011 HMDA Data

Race	<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	Above \$75K	Data Missing	Average
American Indian	%	50.0%	20.0%	25.0%	%	.0%	.0%	12.5%
Asian	33.3%	30.0%	14.3%	7.7%	.0%	5.9%	.0%	12.7%
Black	100.0%	34.6%	26.8%	26.3%	20.6%	25.0%	28.6%	27.2%
White	49.1%	24.5%	18.6%	15.4%	13.5%	10.9%	23.4%	17.6%
Not Available	58.3%	36.6%	36.2%	32.1%	26.2%	18.1%	51.3%	32.6%
Not Applicable	%	%	%	.0%	%	%	100.0%	33.3%
Average	51.0%	25.6%	20.1%	17.2%	14.7%	11.7%	27.0%	19.0%
Non-Hispanic Ethnicity	49.3%	24.5%	18.8%	15.6%	14.1%	11.4%	21.9%	17.8%
Hispanic (Ethnicity)	%	36.0%	30.8%	21.7%	15.4%	5.6%	.0%	24.4%

Table 47.C.12
Loan Applications by Reason for Denial by Race/Ethnicity of Applicant
 47. Remainder of Trumbull County
 2004–2011 HMDA Data

Denial Reason	American Indian	Asian	Black	White	Not Available	Not Applicable	Total	Hispanic (Ethnicity)
Debt-to-Income Ratio	2	0	15	292	30	0	339	4
Employment History	0	1	0	35	0	0	36	1
Credit History	1	1	19	470	79	0	570	5
Collateral	0	1	7	240	18	0	266	5
Insufficient Cash	0	1	0	48	4	0	53	1
Unverifiable Information	0	1	5	61	5	0	72	0
Credit Application Incomplete	0	0	9	238	31	0	278	3
Mortgage Insurance Denied	0	0	2	6	0	0	8	0
Other	0	1	20	237	60	0	318	1
Missing	0	2	33	601	135	1	772	9
Total	3	8	110	2,228	362	1	2,712	29
% Missing	.0%	25.0%	30.0%	27.0%	37.3%	100.0%	28.5%	31.0%

Table 47.C.13
Loan Applications by Income of Applicant: Originated and Denied
 47. Remainder of Trumbull County
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Loan Originated	18	13	19	18	19	20	11	7	125
	Application Denied	22	24	21	15	11	14	10	13	130
	Denial Rate	55.0%	64.9%	52.5%	45.5%	36.7%	41.2%	47.6%	65.0%	51.0%
\$15,001–\$30,000	Loan Originated	362	346	301	276	179	142	137	123	1,866
	Application Denied	95	118	127	94	69	56	44	39	642
	Denial Rate	20.8%	25.4%	29.7%	25.4%	27.8%	28.3%	24.3%	24.1%	25.6%
\$30,001–\$45,000	Loan Originated	567	626	601	426	302	235	226	205	3,188
	Application Denied	111	140	163	115	103	52	64	55	803
	Denial Rate	16.4%	18.3%	21.3%	21.3%	25.4%	18.1%	22.1%	21.2%	20.1%
\$45,001–\$60,000	Loan Originated	415	494	430	329	206	174	161	161	2,370
	Application Denied	70	96	95	75	49	36	43	28	492
	Denial Rate	14.4%	16.3%	18.1%	18.6%	19.2%	17.1%	21.1%	14.8%	17.2%
\$60,001–\$75,000	Loan Originated	282	309	235	222	158	99	100	101	1,506
	Application Denied	33	60	48	45	24	12	8	29	259
	Denial Rate	10.5%	16.3%	17.0%	16.9%	13.2%	10.8%	7.4%	22.3%	14.7%
Above \$75,000	Loan Originated	420	445	420	308	231	137	185	156	2,302
	Application Denied	35	63	55	48	29	30	20	25	305
	Denial Rate	7.7%	12.4%	11.6%	13.5%	11.2%	18.0%	9.8%	13.8%	11.7%
Data Missing	Loan Originated	58	64	41	21	10	9	8	8	219
	Application Denied	24	13	21	5	5	4	4	5	81
	Denial Rate	29.3%	16.9%	33.9%	19.2%	33.3%	30.8%	33.3%	38.5%	27.0%
Total	Loan Originated	2,122	2,297	2,047	1,600	1,105	816	828	761	11,576
	Application Denied	390	514	530	397	290	204	193	194	2,712
	Denial Rate	15.5%	18.3%	20.6%	19.9%	20.8%	20.0%	18.9%	20.3%	19.0%

Table 47.C.14
Loan Applications by Income and Race/Ethnicity of Applicant: Originated and Denied
 47. Remainder of Trumbull County
 2004–2011 HMDA Data

Race		<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	> \$75K	Data Missing	Total
American Indian	Loan Originated	0	1	4	3	0	10	3	21
	Application Denied	0	1	1	1	0	0	0	3
	Denial Rate	%	50.0%	20.0%	25.0%	%	.0%	.0%	12.5%
Asian	Loan Originated	2	7	12	12	4	16	2	55
	Application Denied	1	3	2	1	0	1	0	8
	Denial Rate	33.3%	30.0%	14.3%	7.7%	.0%	5.9%	.0%	12.7%
Black	Loan Originated	0	34	82	70	50	54	5	295
	Application Denied	4	18	30	25	13	18	2	110
	Denial Rate	100.0%	34.6%	26.8%	26.3%	20.6%	25.0%	28.6%	27.2%
White	Loan Originated	108	1,708	2,896	2,116	1,359	2,077	190	10,454
	Application Denied	104	553	660	386	213	254	58	2,228
	Denial Rate	49.1%	24.5%	18.6%	15.4%	13.5%	10.9%	23.4%	17.6%
Not Available	Loan Originated	15	116	194	167	93	145	19	749
	Application Denied	21	67	110	79	33	32	20	362
	Denial Rate	58.3%	36.6%	36.2%	32.1%	26.2%	18.1%	51.3%	32.6%
Not Applicable	Loan Originated	0	0	0	2	0	0	0	2
	Application Denied	0	0	0	0	0	0	1	1
	Denial Rate	%	%	%	.0%	%	%	100.0%	33.3%
Total	Loan Originated	125	1,866	3,188	2,370	1,506	2,302	219	11,576
	Application Denied	130	642	803	492	259	305	81	2,712
	Denial Rate	51.0%	25.6%	20.1%	17.2%	14.7%	11.7%	27.0%	19.0%
Non-Hispanic Ethnicity	Loan Originated	106	1,702	2,895	2,139	1,374	2,081	196	10,493
	Application Denied	103	552	671	396	226	269	55	2,272
	Denial Rate	49.3%	24.5%	18.8%	15.6%	14.1%	11.4%	21.9%	17.8%
Hispanic (Ethnicity)	Loan Originated	0	16	27	18	11	17	1	90
	Application Denied	0	9	12	5	2	1	0	29
	Denial Rate	%	36.0%	30.8%	21.7%	15.4%	5.6%	.0%	24.4%

PREDATORY LENDING

Table 47.C.15
Originated Owner-Occupied Loans by HAL Status
 47. Remainder of Trumbull County
 2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Other	1,806	1,663	1,479	1,339	916	749	818	744	9,514
HAL	316	634	568	261	189	67	10	17	2,062
Total	2,122	2,297	2,047	1,600	1,105	816	828	761	11,576
Percent HAL	14.9%	27.6%	27.7%	16.3%	17.1%	8.2%	1.2%	2.2%	17.8%

Table 47.C.16
Loans by Loan Purpose by HAL Status
 47. Remainder of Trumbull County
 2004–2011 HMDA Data

Loan Purpose		2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	Other	1,806	1,663	1,479	1,339	916	749	818	744	9,514
	HAL	316	634	568	261	189	67	10	17	2,062
	Percent HAL	14.9%	27.6%	27.7%	16.3%	17.1%	8.2%	1.2%	2.2%	17.8%
Home Improvement	Other	464	565	560	486	280	131	183	162	2,831
	HAL	104	159	113	132	87	45	13	8	661
	Percent HAL	18.3%	22.0%	16.8%	21.4%	23.7%	25.6%	6.6%	4.7%	18.9%
Refinancing	Other	2,639	2,188	1,846	1,726	1,329	1,884	2,120	1,752	15,484
	HAL	723	997	921	526	357	233	23	14	3,794
	Percent HAL	21.5%	31.3%	33.3%	23.4%	21.2%	11.0%	1.1%	.8%	19.7%
Total	Other	4,909	4,416	3,885	3,551	2,525	2,764	3,121	2,658	27,829
	HAL	1,143	1,790	1,602	919	189	67	10	17	6,517
	Percent HAL	18.9%	28.8%	29.2%	20.6%	20.0%	11.1%	1.5%	1.4%	19.0%

Table 47.C.17
HALs Originated by Race of Borrower
 47. Remainder of Trumbull County
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	1	0	1	0	1	0	0	0	3
Asian	1	0	2	1	0	0	0	0	4
Black	17	32	31	13	3	3	0	1	100
White	252	447	452	225	172	63	10	16	1,637
Not Available	44	155	82	22	13	1	0	0	317
Not Applicable	1	0	0	0	0	0	0	0	1
Total	316	634	568	261	189	67	10	17	2,062
Hispanic (Ethnicity)	5	7	3	0	2	0	0	0	17

Table 47.C.18
Rate of HALs Originated by Race/Ethnicity of Borrower
 47. Remainder of Trumbull County
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	25.0%	.0%	33.3%	.0%	33.3%	.0%	.0%	.0%	14.3%
Asian	11.1%	.0%	18.2%	11.1%	.0%	.0%	.0%	.0%	7.3%
Black	32.7%	48.5%	51.7%	36.1%	15.8%	12.0%	.0%	6.7%	33.9%
White	12.9%	22.5%	24.8%	15.1%	17.0%	8.5%	1.3%	2.3%	15.7%
Not Available	41.5%	68.0%	53.2%	36.7%	18.1%	2.3%	.0%	.0%	42.3%
Not Applicable	50.0%	%	%	%	%	%	%	%	50%
Average	14.9%	27.6%	27.7%	16.3%	17.1%	8.2%	01.2%	02.2%	17.8%
Non-Hispanic Ethnicity	13.9%	23.2%	26.0%	15.6%	17.2%	8.6%	1.3%	2.4%	16.3%
Hispanic (Ethnicity)	31.3%	33.3%	17.6%	.0%	33.3%	.0%	.0%	.0%	18.9%

Table 47.C.19
Loans by HAL Status by Race/Ethnicity of Borrower
 47. Remainder of Trumbull County
 2004–2011 HMDA Data

Race	Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Other	3	3	2	3	2	2	2	1	18
	HAL	1	0	1	0	1	0	0	0	3
	Percent HAL	25.0%	.0%	33.3%	.0%	33.3%	.0%	.0%	.0%	14.3%
Asian	Other	8	10	9	8	1	3	8	4	51
	HAL	1	0	2	1	0	0	0	0	4
	Percent HAL	11.1%	.0%	18.2%	11.1%	.0%	.0%	.0%	.0%	7.3%
Black	Other	35	34	29	23	16	22	22	14	195
	HAL	17	32	31	13	3	3	0	1	100
	Percent HAL	32.7%	48.5%	51.7%	36.1%	15.8%	12.0%	.0%	6.7%	33.9%
White	Other	1,697	1,543	1,367	1,267	838	679	744	682	8,817
	HAL	252	447	452	225	172	63	10	16	1,637
	Percent HAL	12.9%	22.5%	24.8%	15.1%	17.0%	8.5%	01.3%	02.3%	15.7%
Not Available	Other	62	73	72	38	59	43	42	43	432
	HAL	44	155	82	22	13	1	0	0	317
	Percent HAL	41.5%	68.0%	53.2%	36.7%	18.1%	2.3%	.0%	.0%	42.3%
Not Applicable	Other	1	0	0	0	0	0	0	0	1
	HAL	1	0	0	0	0	0	0	0	1
	Percent HAL	50.0%	%	%	%	%	%	%	%	50.0%
Total	Other	1,806	1,663	1,479	1,339	916	749	818	744	9,514
	HAL	316	634	568	261	189	67	10	17	2,062
	Percent HAL	14.9%	27.6%	27.7%	16.3%	17.1%	8.2%	1.2%	2.2%	17.8%
Non-Hispanic Ethnicity	Other	1,540	1,567	1,389	1,282	844	698	768	692	8,780
	HAL	248	473	487	237	175	66	10	17	1,713
	Percent HAL	13.9%	23.2%	26.0%	15.6%	17.2%	8.6%	1.3%	2.4%	16.3%
Hispanic (Ethnicity)	Other	11	14	14	14	4	3	5	8	73
	HAL	5	7	3	0	2	0	0	0	17
	Percent HAL	31.3%	33.3%	17.6%	.0%	33.3%	.0%	.0%	.0%	18.9%

Table 47.C.20
Rates of HALs by Income of Borrower
 47. Remainder of Trumbull County
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Average
\$15,000 or Below	11.1%	23.1%	26.3%	27.8%	15.8%	20.0%	9.1%	.0%	18.4%
\$15,001–\$30,000	21.3%	30.9%	38.2%	22.5%	26.3%	10.6%	1.5%	2.4%	22.9%
\$30,001–\$45,000	18.0%	34.5%	31.1%	19.0%	23.2%	9.4%	.0%	3.4%	21.5%
\$45,001–\$60,000	15.2%	27.3%	30.7%	15.8%	12.6%	6.3%	3.1%	1.9%	18.0%
\$60,001–\$75,000	11.0%	22.3%	21.3%	13.1%	13.3%	8.1%	1.0%	1.0%	13.9%
Above \$75,000	7.1%	18.4%	14.0%	8.1%	9.5%	5.1%	0.5%	1.9%	9.9%
Data Missing	19.0%	34.4%	48.8%	33.3%	.0%	.0%	.0%	.0%	27.4%
Average	14.9%	27.6%	27.7%	16.3%	17.1%	8.2%	1.2%	2.2%	17.8%

Table 47.C.21
Loans by HAL Status by Income of Borrower
 47. Remainder of Trumbull County
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Other	16	10	14	13	16	16	10	7	102
	HAL	2	3	5	5	3	4	1	0	23
	Percent HAL	11.1%	23.1%	26.3%	27.8%	15.8%	20.0%	9.1%	.0%	18.4%
\$15,001–\$30,000	Other	285	239	186	214	132	127	135	120	1,438
	HAL	77	107	115	62	47	15	2	3	428
	Percent HAL	21.3%	30.9%	38.2%	22.5%	26.3%	10.6%	1.5%	2.4%	22.9%
\$30,001–\$45,000	Other	465	410	414	345	232	213	226	198	2,503
	HAL	102	216	187	81	70	22	0	7	685
	Percent HAL	18.0%	34.5%	31.1%	19.0%	23.2%	9.4%	.0%	3.4%	21.5%
\$45,001 – \$60,000	Other	352	359	298	277	180	163	156	158	1,943
	HAL	63	135	132	52	26	11	5	3	427
	Percent HAL	15.2%	27.3%	30.7%	15.8%	12.6%	6.3%	3.1%	1.9%	18.0%
\$60,001–\$75,000	Other	251	240	185	193	137	91	99	100	1,296
	HAL	31	69	50	29	21	8	1	1	210
	Percent HAL	11.0%	22.3%	21.3%	13.1%	13.3%	8.1%	1.0%	1.0%	13.9%
Above \$75,000	Other	390	363	361	283	209	130	184	153	2,073
	HAL	30	82	59	25	22	7	1	3	229
	Percent HAL	7.1%	18.4%	14.0%	8.1%	9.5%	5.1%	.5%	1.9%	9.9%
Data Missing	Other	47	42	21	14	10	9	8	8	159
	HAL	11	22	20	7	0	0	0	0	60
	Percent HAL	19.0%	34.4%	48.8%	33.3%	.0%	.0%	.0%	.0%	27.4%
Total	Other	1,806	1,663	1,479	1,339	916	749	818	744	9,514
	HAL	316	634	568	261	189	67	10	17	2,062
	Percent HAL	14.9%	27.6%	27.7%	16.3%	17.1%	8.2%	1.2%	2.2%	17.8%

D. CRA DATA

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

Table 47.D.1
Small Business Loans Originated: \$100,000 or Less by Tract MFI
 47. Remainder of Trumbull 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	46	1,112	976		2,134
2001	0	87	1,195	1,030		2,312
2002	0	112	1,471	1,322		2,905
2003	0	134	2,056	764		2,954
2004	0	112	2,325	825		3,262
2005	0	172	2,418	801		3,391
2006	0	174	2,985	1,055		4,214
2007	0	177	3,344	1,253		4,774
2008	0	139	2,322	885		3,346
2009	0	70	1,122	439		1,631
2010	0	69	1,059	380		1,508
2011	0	72	1,282	428		1,782
Total	0	1,364	22,691	10,158	0	34,213
Loan Amount (\$1,000s)						
2000	0	712	15,018	15,117		30,847
2001	0	1,211	16,402	13,020		30,633
2002	0	1,129	14,718	13,910		29,757
2003	0	1,748	20,807	7,199		29,754
2004	0	1,180	23,351	6,776		31,307
2005	0	1,807	26,769	8,641		37,217
2006	0	2,335	29,854	9,725		41,914
2007	0	2,015	31,417	12,497		45,929
2008	0	1,300	22,053	7,010		30,363
2009	0	1,085	15,319	4,834		21,238
2010	0	1,555	17,017	5,913		24,485
2011	0	1,669	19,256	5,168		26,093
Total	0	17,746	251,981	109,810	0	379,537

Table 47.D.2
Small Business Loans Originated: \$100,001 to \$250,000 by Tract MFI
 47. Remainder of Trumbull 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	1	46	61		108
2001	0	10	70	61		141
2002	0	5	53	50		108
2003	0	12	67	33		112
2004	0	6	105	26		137
2005	0	7	86	25		118
2006	0	3	78	18		99
2007	0	4	70	20		94
2008	0	3	56	7		66
2009	0	3	63	9		75
2010	0	8	68	18		94
2011	0	6	73	15		94
Total	0	68	835	343	0	1,246
Loan Amount (\$1,000s)						
2000	0	104	7,881	10,379		18,364
2001	0	1,668	11,367	10,589		23,624
2002	0	654	9,462	7,996		18,112
2003	0	2,114	11,381	5,718		19,213
2004	0	1,070	18,291	4,129		23,490
2005	0	1,254	14,825	4,357		20,436
2006	0	630	12,561	3,093		16,284
2007	0	629	11,923	3,459		16,011
2008	0	650	9,923	1,163		11,736
2009	0	657	10,710	1,548		12,915
2010	0	1,782	12,019	3,334		17,135
2011	0	1,064	12,980	2,500		16,544
Total	0	12,276	143,323	58,265	0	213,864

Table 47.D.3
Small Business Loans Originated: More than \$250,000 by Tract MFI
 47. Remainder of Trumbull 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	0	48	33		81
2001	0	6	49	48		103
2002	0	1	47	46		94
2003	0	17	91	21		129
2004	0	9	93	27		129
2005	0	8	77	25		110
2006	0	0	78	21		99
2007	0	5	57	17		79
2008	0	2	38	11		51
2009	0	3	63	18		84
2010	0	8	60	13		81
2011	0	15	77	21		113
Total	0	74	778	301	0	1,153
Loan Amount (\$1,000s)						
2000	0	0	23,782	16,670		40,452
2001	0	2,598	24,882	23,242		50,722
2002	0	260	23,861	20,644		44,765
2003	0	10,057	45,699	10,301		66,057
2004	0	5,962	44,276	13,297		63,535
2005	0	4,971	40,168	14,259		59,398
2006	0	0	40,526	10,567		51,093
2007	0	2,731	31,174	8,311		42,216
2008	0	1,750	19,815	5,621		27,186
2009	0	1,628	36,806	10,389		48,823
2010	0	5,192	33,904	6,144		45,240
2011	0	8,364	44,880	12,217		65,461
Total	0	43,513	409,773	151,662	0	604,948

Table 47.D.4
Small Business Loans to Businesses with Gross Annual Revenues of Less Than \$1 Million by Tract MFI
 47. Remainder of Trumbull 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	19	459	462		940
2001	0	43	546	498		1,087
2002	0	38	418	444		900
2003	0	43	726	267		1,036
2004	0	34	763	253		1,050
2005	0	67	1,096	319		1,482
2006	0	69	1,211	392		1,672
2007	0	60	1,322	462		1,844
2008	0	44	834	289		1,167
2009	0	27	402	119		548
2010	0	34	443	142		619
2011	0	29	607	175		811
Total	0	507	8,827	3,822	0	13,156
Loan Amount (\$1,000s)						
2000	0	497	17,780	25,797		44,074
2001	0	2,376	28,810	31,425		62,611
2002	0	1,410	21,567	27,402		50,379
2003	0	1,649	39,546	13,144		54,339
2004	0	1,264	31,226	11,134		43,624
2005	0	1,540	36,081	11,504		49,125
2006	0	1,568	34,016	12,768		48,352
2007	0	1,635	26,668	12,527		40,830
2008	0	1,029	17,625	7,922		26,576
2009	0	1,328	17,648	6,935		25,911
2010	0	2,408	20,294	6,036		28,738
2011	0	1,505	22,055	7,176		30,736
Total	0	18,209	313,316	173,770	0	505,295

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 47.E.1
Fair Housing Complaints by Basis
47. Remainder of Trumbull County
2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability	3	1	2	0	0		1	0	4	11
Family Status				1	0	2				3
Race	0	1	0	2	0	0	0	2	1	6
Sex				1		1		1		3
Total Bases	3	2	2	4	0	3	1	3	5	23
Total Complaints	3	2	2	2	0	3	1	3	4	20

Table 47.E.2
Fair Housing Complaints by Issue
47. Remainder of Trumbull County
2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Failure to make reasonable accommodation		2	1	0					4	7
Discriminatory refusal to rent		1			1	0		1	1	4
Discrimination in terms, conditions or privileges relating to rental		0		1	1	0	1	0	1	4
Discriminatory terms, conditions, privileges, or services and facilities			0	1				0	2	3
Discrimination in services and facilities relating to rental						1			2	3
Discriminatory advertising, statements, and notices						0	1	1		2
Discriminatory acts under Section 818 (coercion, etc.)			1						1	2
Discriminatory refusal to rent and negotiate for rental							1	0		1
Discriminatory advertisement - rental						1				1
Using ordinances to discriminate in zoning and land use								1		1
Total Issues	3	2	2	2	0	3	2	4	10	28
Total Complaints	3	2	2	2	0	3	1	3	4	20

Table 47.E.3
Fair Housing Complaints by Closure Status
47. Remainder of Trumbull County
2004–2012 HUD Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Administrative Closure	1		0			1	1	1		4
Conciliated / Settled	1	1	1	0	0	1		0	1	5
No Cause	1	1	1	2	0	1		2		8
Open									3	3
Total Complaints	3	2	2	2	0	3	1	3	4	20

HUD Complaints Found With Cause

Table 47.E.4
Fair Housing Complaints Found With Cause by Basis
 47. Remainder of Trumbull County
 2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability	1	1	1	0				0	1	4
Sex						1				1
Total Bases	1	1	1	0	0	1		0	1	5
Total Complaints	1	1	1	0	0	1		0	1	5

Table 47.E.5
Fair Housing Complaints Found With Cause by Issue
 47. Remainder of Trumbull County
 2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Discrimination in services and facilities relating to rental						1			1	2
Failure to make reasonable accommodation			1						1	2
Discriminatory refusal to rent			1							1
Discriminatory terms, conditions, privileges, or services and facilities					1					1
Total Issues	1	1	1	0	0	1	0	0	2	6
Total Complaints	1	1	1	0	0	1		0	1	5

OHIO CIVIL RIGHTS COMMISSION COMPLAINTS

Table 47.E.6
Fair Housing Complaints by Basis
 47. Remainder of Trumbull County
 2004–2012 OCRRC Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability	2	0	2	0	0		0	1	1	6
Family Status					0	1	0			1
National Origin						1				1
Race	0	0	0	1	1	0	0	3		5
Total Bases	2	0	2	1	0	3	0	4	1	13
Total Complaints	2	0	2	1	0	3	0	3	1	12

Table 47.E.7
Fair Housing Complaints by Issue
 47. Remainder of Trumbull County
 2004–2012 OCRRC Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Other	0	0			0	1	0	1		2
Reasonable Accommodation	2		1	0					1	4
Terms and Conditions	0	0	1	1		2	0	2		6
Total Issues	2	0	2	1	0	3	0	3	1	12
Total Complaints	2	0	2	1	0	3	0	3	1	12

Table 47.E.8
Fair Housing Complaints by Closure Status
 47. Remainder of Trumbull County
 2004–2012 OCRC Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
CP Failed to Cooperate			0			1		0		1
No Cause Finding Issued	1	0	0	1	0	1	0	3		6
Settlement With Benefits			2	0	0	0		0		2
Withdrawal With Benefits	1	0		0	0	1			1	3
Total Complaints	2	0	2	1	0	3	0	3	1	12

FAIR HOUSING CONTACT SERVICE COMPLAINTS

Table 47.E.9
Fair Housing Complaints by Basis
 47. Remainder of Trumbull County
 2004–2012 FHCS Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Color					1					1
Disability			0		1	0			7	8
Familial Status				3						3
Race				1	0					1
Other				1					1	2
Total Bases	0	0	0	0	7	0	0	0	8	15
Total Complaints			0	0	4	0			8	12

Table 47.E.10
Fair Housing Complaints by Closure Status
 47. Remainder of Trumbull County
 2004–2012 FHCS Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Closed				0	3	0				3
Elected not to pursue									1	1
Inquiry									2	2
No contact									1	1
No probable cause					0				1	1
Pending			0						2	2
Reasonable accommodation granted									1	1
Withdrawal of Charge					1					1
Total Complaints	0	0	0	0	4	0	0	0	8	12

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 47.F.1

Primary Role of Respondent

47. Remainder of Trumbull County
2012–2013 Fair Housing Survey for
Housing Stakeholders Data

Primary Role	Total
Real Estate	1
Total	1

FEDERAL, STATE, AND LOCAL LAWS

Table 47.F.2

**Familiarity with Fair
Housing Laws**

47. Remainder of Trumbull County
2012–2013 Fair Housing Survey
for Housing Stakeholders Data

Familiarity	Total
Not Familiar	0
Somewhat Familiar	0
Very Familiar	1
Missing	0
Total	1

Table 47.F.3

Perceptions About Fair Housing Laws

47. Remainder of Trumbull 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	0	0	0	1
Are fair housing laws difficult to understand or follow?	0	1	0	0	1
Do you think fair housing laws should be changed?	0	0	1	0	1
Do you think fair housing laws are adequately enforced?	1	0	0	0	1

Table 47.F.4

Fair Housing Activities

47. Remainder of Trumbull County
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?		1	0		0	1
Have you participated in fair housing training?		1	0		0	1
Are you aware of any fair housing testing?			0	1	0	1
Testing and education	Too Little	Right Amount	Too Much	Don't Know	Missing	Total
Is there sufficient outreach and education activity?	0	1		0	0	1
Is there sufficient testing?	0	0		1	0	1

Table 47.F.5**Protected Classes**47. Remainder of Trumbull
County2012–2013 Fair Housing Survey
for Housing Stakeholders Data

Protected Class	Total
Age	1
Disability	1
Total	2

Table 47.F.6**Fair Housing Violation Referrals**47. Remainder of Trumbull County
2012–2013 Fair Housing Survey for
Housing Stakeholders Data

Referral	Total
HUD	1
Total	1

LOCAL FAIR HOUSING**Table 47.F.7****Local Fair Housing**47. Remainder of Trumbull 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?	0	0	1	0	1
Are there any specific geographic areas that have fair housing problems?	0	1	0	0	1
Are there any specific groups in that face housing discrimination?	0	1	0	0	1

FAIR HOUSING IN THE PRIVATE SECTOR

Table 47.F.8
Barriers to Fair Housing in the Private Sector
 47. Remainder of Trumbull 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?	0	0	1	0	1
The real estate industry?	0	1	0	0	1
The mortgage and home lending industry?	0	1	0	0	1
The housing construction or accessible housing design fields?	0	1	0	0	1
The home insurance industry?	0	1	0	0	1
The home appraisal industry?	0	1	0	0	1
Any other housing services?	0	1	0	0	1

FAIR HOUSING IN THE PUBLIC SECTOR

Table 47.F.9
Barriers to Fair Housing in the Public Sector
 47. Remainder of Trumbull 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	1	0	0	1
Zoning laws?	0	0	1	0	1
Occupancy standards or health and safety codes?	0	1	0	0	1
Property tax policies?	0	1	0	0	1
Permitting process?	0	1	0	0	1
Housing construction standards?	0	1	0	0	1
Neighborhood or community development policies?	0	1	0	0	1
Limited access to government services, such as employment services?	0	1	0	0	1
Public administrative actions or regulations?	0	1	0	0	1

NARRATIVE COMMENTS

Federal, State, and Local Laws

Table 47.F.10
How did you become aware of fair housing laws?

47. Remainder of Trumbull County
 2013 Fair Housing Survey Data

Comments:
Ongoing education

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 Trumbull County that received and completed the survey.⁸¹

Table 47.G.1
Housing Development
 47. Remainder of Trumbull 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"?	18	8	6	29	61
Guidelines that encourage development affordable housing units?	1	25	5	30	61
Any potential barriers to the development of low- to moderate- income housing?	10	16	6	29	61
Guidelines that allow the development of mixed use housing?	12	11	6	32	61
Any potential barriers to the development of mixed use housing?	10	11	8	32	61
Occupancy Standards					
A definition for the term "family"?	8	16	7	30	61
Residential occupancy standards or limits?	5	17	7	32	61
Special Needs Housing					
A definition for the term "disability"?	0	18	8	35	61
Development standards for making housing accessible to persons with disabilities?	5	12	8	36	61
A process by which persons with disabilities can request modification to the jurisdiction's policies?	5	11	10	35	61
Standards for the development of senior housing?	2	16	8	35	61
Guidelines that distinguish senior citizen housing from other residential uses?	1	19	6	35	61
Guidelines for developing housing for any other special needs populations?	0	19	7	35	61
Fair Housing Policies					
A fair housing ordinance, policy, or regulation?	2	14	9	36	61
Policies or practices for "affirmatively furthering fair housing"?	4	13	8	36	61

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 Trumbull 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

⁸¹ For areas with both nonentitlement and entitlement communities, the results of the nonentitlement community government official survey and the entitlement community interviews were summed.

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 Remainder of Trumbull 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 in the remainder of Trumbull County.

Results of the Fair Housing Surveys indicate that some local communities in Trumbull County lack or do not have sufficient policies or practices to completely address the duty to affirmatively further fair housing.

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 Trumbull County. This was supported by input received in the Fair Housing Survey as well as in the fair housing forums and in comment received during public review of the draft report.

Suggestion: Conduct more outreach and educational activities in a uniform, methodical, and consistent fashion. This should be done in consort with other for-profit, non-profit, and 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 in the remainder of Trumbull County. 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 47.H.1
Impediments Matrix
 47. Remainder of Trumbull 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 ⁸²		
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	Lack of inclusionary policies							X		X	All	M

⁸² 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.

48. WAYNE COUNTY

A. CENSUS BUREAU DATA

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

Table 48.A.1

Population by Age

48. Wayne County

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 48.A.2

Elderly Population by Age

48. Wayne County

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 48.A.3

Population by Race and Ethnicity

48. Wayne County

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 48.A.4
Disability by Age
 48. Wayne 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%	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 48.A.5
Employment Status by Disability and Type: Age 18 to 64
 48. Wayne County
 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 48.A.6
Households by Income

48. Wayne 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	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 48.A.7
Poverty by Age

48. Wayne 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	1,154	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 48.A.8
Households by Year Home Built

48. Wayne 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	9,539	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 48.A.9**Housing Units by Type**

48. Wayne 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	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 48.A.10**Housing Units by Tenure**

48. Wayne County

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 48.A.11**Disposition of Vacant Housing Units**

48. Wayne County

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 48.A.12**Households by Household Size**

48. Wayne County

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 48.A.13
Household Type by Tenure
 48. Wayne County
 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 48.A.14
Group Quarters Population
 48. Wayne 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	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 48.A.15
Overcrowding and Severe Overcrowding
 48. Wayne 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	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 48.A.16
Households with Incomplete Plumbing Facilities
 48. Wayne County
 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 48.A.17
Households with Incomplete Kitchen Facilities
 48. Wayne County
 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 48.A.18
Cost Burden and Severe Cost Burden by Tenure
 48. Wayne 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	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 48.A.19
Median Housing Costs
 48. Wayne County
 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 48.B.1
Employment by Industry
 48. Wayne County
 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) ⁸³	(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%

⁸³ (D): These data are not shown to avoid disclosure of confidential information, but estimates are included in the totals.

Table 48.B.2
Real Earnings by Industry

48. Wayne County
 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) ⁸⁴	(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%

⁸⁴ (D): These data are not shown to avoid disclosure of confidential information, but estimates are included in the totals.

Table 48.B.3
Real Earnings Per Job by Industry
 48. Wayne 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	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) ⁸⁵	(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	42,636	42,114	41,089	41,377	40,002	41,891	1.21%

⁸⁵ (D): These data are not shown to avoid disclosure of confidential information, but estimates are included in the totals.

Table 48.B.4
Total Employment and Real Personal Income
 48. Wayne 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	1,186,287	73,148	114,013	197,101	92,394	1,516,647	17,637	37,213	31,877
1970	1,196,341	72,857	109,919	204,220	101,484	1,539,107	17,620	37,521	31,882
1971	1,246,598	78,218	107,678	210,863	113,396	1,600,318	18,104	37,608	33,147
1972	1,310,938	86,068	117,792	218,523	121,088	1,682,273	18,788	38,558	33,999
1973	1,414,994	108,220	123,965	230,618	136,907	1,798,264	19,827	40,453	34,980
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	19,858	41,258	34,274
1977	1,482,076	118,879	142,359	259,470	189,536	1,954,563	20,765	43,358	34,183
1978	1,590,657	130,645	154,651	281,133	190,301	2,086,098	21,840	45,235	35,165
1979	1,620,655	139,772	163,302	304,129	200,583	2,148,897	22,088	46,053	35,190
1980	1,572,414	137,643	146,396	347,877	226,954	2,155,999	22,112	46,251	33,998
1981	1,579,576	148,571	123,110	395,261	241,307	2,190,682	22,429	46,318	34,104
1982	1,534,418	146,115	98,368	406,891	271,609	2,165,171	22,084	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	35,680
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	25,703	51,941	36,756
1989	1,906,280	208,816	48,735	575,445	323,624	2,645,269	26,150	52,679	36,186
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	25,692	53,912	35,493
1992	2,008,519	227,791	42,042	536,737	395,210	2,754,718	26,572	53,033	37,873
1993	2,114,120	244,312	34,543	545,859	390,381	2,840,590	27,073	55,733	37,932
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	28,453	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	42,636
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 48.C.1
Labor Force Statistics
 48. Wayne County
 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.⁸⁶ The information presented in this section presents detailed HMDA data, including denial rates and predatory lending including high annual percentage rate (APR) loans.

Table 48.D.1
Purpose of Loan by Year
48. Wayne County
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 48.D.2
Occupancy Status for Home Purchase Loan Applications
48. Wayne County
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 48.D.3
Owner-Occupied Home Purchase Loan Applications by Loan Type
48. Wayne County
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

⁸⁶ 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 48.D.4
Loan Applications by Action Taken
 48. Wayne County
 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 48.D.5
Denial Rates by Gender of Applicant
 48. Wayne County
 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 48.D.6
Loan Applications by Selected Action Taken by Gender of Applicant
 48. Wayne County
 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 48.D.7
Denial Rates by Race/Ethnicity of Applicant
 48. Wayne County
 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 48.D.8
Loan Applications by Selected Action Taken by Race/Ethnicity of Applicant
 48. Wayne County
 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 48.D.9
Loan Applications by Reason for Denial
 48. Wayne County
 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 48.D.10
Denial Rates by Income of Applicant
 48. Wayne County
 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 48.D.11
Denial Rates of Loans by Race/Ethnicity and Income of Applicant
 48. Wayne County
 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 48.D.12
Loan Applications by Reason for Denial by Race/Ethnicity of Applicant
 48. Wayne County
 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 48.D.13
Loan Applications by Income of Applicant: Originated and Denied
 48. Wayne County
 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 48.D.14
Loan Applications by Income and Race/Ethnicity of Applicant: Originated and Denied
 48. Wayne County
 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 48.D.15
Originated Owner-Occupied Loans by HAL Status
 48. Wayne County
 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 48.D.16
Loans by Loan Purpose by HAL Status
 48. Wayne County
 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 48.D.17
HALs Originated by Race of Borrower
 48. Wayne County
 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 48.D.18
Rate of HALs Originated by Race/Ethnicity of Borrower
 48. Wayne County
 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 48.D.19
Loans by HAL Status by Race/Ethnicity of Borrower
 48. Wayne County
 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 48.D.20
Rates of HALs by Income of Borrower
 48. Wayne County
 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 48.D.21
Loans by HAL Status by Income of Borrower
 48. Wayne County
 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 48.E.1
Small Business Loans Originated: \$100,000 or Less by Tract MFI
 48. Wayne 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		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 48.E.2
Small Business Loans Originated: \$100,001 to \$250,000 by Tract MFI
 48. Wayne 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		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 48.E.3
Small Business Loans Originated: More than \$250,000 by Tract MFI
 48. Wayne 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		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 48.E.4
Small Business Loans to Businesses with Gross Annual Revenues of Less Than \$1 Million by Tract MFI
 48. Wayne 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		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 48.F.1
Fair Housing Complaints by Basis
 48. Wayne County
 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 48.F.2
Fair Housing Complaints by Issue
 48. Wayne 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			1	2	1	1	2		1	9
Discriminatory refusal to rent		2	1			1	2			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 48.F.3
Fair Housing Complaints by Closure Status
 48. Wayne County
 2004–2012 HUD Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Administrative Closure	1		1					3		5
Cause (FHAP)	2		1	1						4
Conciliated / Settled		2	4	1		3	1	1	1	13
No Cause		3	1		3	1				8
Total Complaints	3	5	7	2	3	4	1	4	1	30

HUD Complaints Found With Cause

Table 48.F.4
Fair Housing Complaints Found With Cause by Basis
 48. Wayne County
 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 48.F.5
Fair Housing Complaints Found With Cause by Issue
 48. Wayne County
 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 48.F.6
Fair Housing Complaints by Basis
 48. Wayne County
 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 48.F.7
Fair Housing Complaints by Issue
 48. Wayne County
 2004–2012 OCRRC 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 48.F.8
Fair Housing Complaints by Closure Status
 48. Wayne County
 2004–2012 OCRRC 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 48.F.9
Fair Housing Complaints by Basis
 48. Wayne County
 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 48.F.10
Fair Housing Complaints by Closure Status
 48. Wayne County
 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 48.G.1
Primary Role of Respondent
 48. Wayne County
 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 48.G.2
**Familiarity with Fair
 Housing Laws**

48. Wayne County
 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 48.G.3
Perceptions About Fair Housing Laws

48. Wayne 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		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 48.G.4**Fair Housing Activities**

48. Wayne County

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?	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 48.G.5**Protected Classes**

48. Wayne County

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 48.G.6**Fair Housing Violation
Referrals**

48. Wayne County

2012–2013 Fair Housing Survey
for Housing Stakeholders Data

Referral	Total
City	1
Lawyer	1
Total	2

LOCAL FAIR HOUSING**Table 48.G.7****Local Fair Housing**

48. Wayne 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	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 48.G.8

Barriers to Fair Housing in the Private Sector

48. Wayne 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		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 48.G.9

Barriers to Fair Housing in the Public Sector

48. Wayne 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	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 48.G.10

How did you become aware of fair housing laws?

48. Wayne County

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 48.G.11

How should fair housing laws be changed?

48. Wayne County

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 48.G.14****Are there any specific groups in that face housing discrimination?**48. Wayne County
2013 Fair Housing Survey Data

Comments:
Or, perhaps criminals.

Fair Housing in the Private Sector**Table 48.G.19****Are you aware of any questionable practices or barriers to fair housing choice in the housing construction or accessible housing design fields?**48. Wayne County
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 48.G.20****Are you aware of any questionable practices or barriers to fair housing choice in land use policies?**48. Wayne County
2013 Fair Housing Survey Data

Comments:
and why wouldn't a community choose to do that?

Table 48.G.21**Are you aware of any questionable practices or barriers to fair housing choice in zoning laws?**48. Wayne County
2013 Fair Housing Survey Data

Comments:
at what point does someone else's rights supplant mine - especially in regard to property?

Table 48.G.22**Are you aware of any questionable practices or barriers to fair housing choice in occupancy standards or health and safety codes?**48. Wayne County
2013 Fair Housing Survey Data

Comments:
equality under the law!

Table 48.G.23**Are you aware of any questionable practices or barriers to fair housing choice in property tax policies?**48. Wayne County
2013 Fair Housing Survey Data

Comments:
Why?

Table 48.G.24

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

48. Wayne County
2013 Fair Housing Survey Data

Comments:
Why?

Table 48.G.25

Are you aware of any questionable practices or barriers to fair housing choice in neighborhood or community development policies?

48. Wayne County
2013 Fair Housing Survey Data

Comments:
Isn't that what zoning does - restrict property rights?

Table 48.G.26

Are you aware of any barriers that limit access to government services, such as a lack of transportation or employment services?

48. Wayne County
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 Wayne County that received and completed the survey.⁸⁷

⁸⁷ 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 48.H.1
Housing Development
 48. Wayne 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"?	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 Wayne 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 Wayne 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 in Wayne County.

Results of the Fair Housing Surveys indicate that a few local communities in Wayne County lack or do not have sufficient policies or practices that adequately address the duty to affirmatively further fair housing.

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 Wayne 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 in Wayne County. 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 48.I.1
Impediments Matrix
 48. Wayne 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 ⁸⁸		
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			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	Lack of inclusionary policies							X		X	All	M

⁸⁸ 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.

49. CUYAHOGA URBAN COUNTY

A. CENSUS BUREAU DATA

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

Table 49.A.1

Population by Age

49. Cuyahoga Urban County
2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Under 5	35,021	5.6%	31,775	5.1%	-9.3%
5 to 19	124,663	19.8%	120,414	19.3%	-3.4%
20 to 24	29,003	4.6%	31,174	5.0%	7.5%
25 to 34	73,209	11.6%	67,036	10.8%	-8.4%
35 to 54	194,741	30.9%	175,253	28.2%	-10.0%
55 to 64	61,408	9.8%	85,850	13.8%	39.8%
65 or Older	111,365	17.7%	110,944	17.8%	-.4%
Total	629,410	100.0%	622,446	100.0%	-1.1%

Table 49.A.2

Elderly Population by Age

49. Cuyahoga Urban County
2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
65 to 66	10,293	9.2%	11,669	10.5%	13.4%
67 to 69	15,837	14.2%	16,951	15.3%	7.0%
70 to 74	27,739	24.9%	23,197	20.9%	-16.4%
75 to 79	25,491	22.9%	20,455	18.4%	-19.8%
80 to 84	17,705	15.9%	18,856	17.0%	6.5%
85 or Older	14,300	12.8%	19,816	17.9%	38.6%
Total	111,365	100.0%	110,944	100.0%	-.4%

Table 49.A.3

Population by Race and Ethnicity

49. Cuyahoga Urban County
2000 & 2010 Census SF1 Data

Race	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
White	529,948	84.2%	486,123	78.1%	-8.3%
Black	74,011	11.8%	101,081	16.2%	36.6%
American Indian	608	.1%	714	.1%	17.4%
Asian	14,472	2.3%	20,280	3.3%	40.1%
Native Hawaiian/ Pacific Islander	105	.0%	131	.0%	24.8%
Other	2,475	.4%	3,827	.6%	54.6%
Two or More Races	7,791	1.2%	10,290	1.7%	32.1%
Total	629,410	100.0%	622,446	100.0%	-1.1%
Non-Hispanic	621,394	98.7%	607,834	97.7%	-2.2%
Hispanic	8,016	1.3%	14,612	2.3%	82.3%

Table 49.A.4**Households by Income**

49. Cuyahoga Urban 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	25,502	9.9%	23,443	9.2%
\$15,000 to \$19,999	12,919	5.0%	11,967	4.7%
\$20,000 to \$24,999	14,373	5.6%	12,688	5.0%
\$25,000 to \$34,999	30,176	11.7%	25,775	10.1%
\$35,000 to \$49,999	42,350	16.5%	36,806	14.5%
\$50,000 to \$74,999	55,016	21.4%	47,277	18.6%
\$75,000 to \$99,999	33,497	13.0%	33,824	13.3%
\$100,000 or More	43,443	16.9%	62,482	24.6%
Total	257,276	100.0%	254,262	100.0%

Table 49.A.5**Poverty by Age**

49. Cuyahoga Urban 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	2,259	7.9%	4,625	10.3%
6 to 17	5,377	18.8%	9,459	21.1%
18 to 64	15,468	54.1%	24,228	54.0%
65 or Older	5,490	19.2%	6,562	14.6%
Total	28,594	100.0%	44,874	100.0%
Poverty Rate	4.6%	.	7.4%	.

Table 49.A.6**Households by Year Home Built**

49. Cuyahoga Urban 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	28,008	10.9%	27,087	10.7%
1940 to 1949	26,862	10.4%	21,124	8.3%
1950 to 1959	62,830	24.4%	64,035	25.2%
1960 to 1969	52,391	20.4%	45,749	18.0%
1970 to 1979	38,713	15.0%	37,113	14.6%
1980 to 1989	23,399	9.1%	22,884	9.0%
1990 to 1999	25,030	9.7%	22,468	8.8%
2000 to 2004	.	.	9,298	3.7%
2005 or Later	.	.	4,504	1.8%
Total	257,233	100.0%	254,262	100.0%

Table 49.A.7**Housing Units by Type**

49. Cuyahoga Urban 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	198,385	73.7%	205,079	74.4%
Duplex	6,269	2.3%	6,049	2.2%
Tri- or Four-Plex	3,691	1.4%	4,264	1.5%
Apartment	58,934	21.9%	58,220	21.1%
Mobile Home	2,035	.8%	1,960	.7%
Boat, RV, Van, Etc.	0	.0%	58	.0%
Total	269,314	100.0%	275,630	100.0%

Table 49.A.8**Housing Units by Tenure**

49. Cuyahoga Urban County

2000 & 2010 Census SF1 Data

Tenure	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
Occupied Housing Units	257,261	95.5%	261,298	92.6%	1.6%
Owner-Occupied	193,077	75.1%	190,270	72.8%	-1.5%
Renter-Occupied	64,184	24.9%	71,028	27.2%	10.7%
Vacant Housing Units	12,080	4.5%	20,910	7.4%	73.1%
Total Housing Units	269,341	100.0%	282,208	100.0%	4.8%

Table 49.A.9**Disposition of Vacant Housing Units**

49. Cuyahoga Urban County

2000 & 2010 Census SF1 Data

Disposition	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
For Rent	5,416	44.8%	8,596	41.1%	58.7%
For Sale	2,283	18.9%	4,462	21.3%	95.4%
Rented or Sold, Not Occupied	1,245	10.3%	1,314	6.3%	5.5%
For Seasonal, Recreational, or Occasional Use	1,221	10.1%	1,622	7.8%	32.8%
For Migrant Workers	6	0.0%	4	.0%	-33.3%
Other Vacant	1,909	15.8%	4,912	23.5%	157.3%
Total	12,080	100.0%	20,910	100.0%	73.1%

Table 49.A.10**Households by Household Size**

49. Cuyahoga Urban County

2000 & 2010 Census SF1 Data

Size	2000 Census		2010 Census		% Change 00-10
	Households	% of Total	Households	% of Total	
One Person	76,385	29.7%	83,142	31.8%	8.8%
Two Persons	87,251	33.9%	87,971	33.7%	.8%
Three Persons	39,004	15.2%	39,019	14.9%	.0%
Four Persons	33,636	13.1%	31,268	12.0%	-7.0%
Five Persons	14,710	5.7%	13,457	5.2%	-8.5%
Six Persons	4,476	1.7%	4,421	1.7%	-1.2%
Seven Persons or More	1,799	.7%	2,020	.8%	12.3%
Total	257,261	100.0%	261,298	100.0%	1.6%

Table 49.A.11
Household Type by Tenure
 49. Cuyahoga Urban County
 2000 & 2010 Census SF1 Data

Household Type	2000 Census		2010 Census		% Change 00–10
	Households	% of Total	Households	% of Total	
Family Households	170,700	66.4%	166,197	63.6%	-2.6%
Married-Couple Family	137,218	80.4%	125,193	75.3%	-8.8%
Owner-Occupied	122,289	89.1%	111,048	88.7%	-9.2%
Renter-Occupied	14,929	10.9%	14,145	11.3%	-5.3%
Other Family	33,482	19.6%	41,004	24.7%	22.5%
Male Householder, No Spouse	7,558	22.6%	9,431	23.0%	24.8%
Owner-Occupied	5,188	68.6%	6,158	65.3%	18.7%
Renter-Occupied	2,370	31.4%	3,273	34.7%	38.1%
Female Householder, No Spouse	25,924	77.4%	31,573	77.0%	21.8%
Owner-Occupied	17,029	65.7%	17,859	56.6%	4.9%
Renter-Occupied	8,895	34.3%	13,714	43.4%	54.2%
Non-Family Households	86,561	33.6%	95,101	36.4%	9.9%
Owner-Occupied	48,571	56.1%	55,205	58.0%	13.7%
Renter-Occupied	37,990	43.9%	39,896	42.0%	5.0%
Total	257,261	100.0%	261,298	100.0%	1.6%

Table 49.A.12
Group Quarters Population
 49. Cuyahoga Urban 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	4.1%	322	4.7%	7.3%
Juvenile Facilities	.	.	527	7.7%	.
Nursing Homes	6,094	84.2%	5,910	86.4%	-3.0%
Other Institutions	842	11.6%	78	1.1%	-90.7%
Total	7,236	100.0%	6,837	100.0%	-5.5%
Noninstitutionalized					
College Dormitories	3,661	65.0%	4,119	79.4%	12.5%
Military Quarters	0	.0%	0	.0%	%
Other Noninstitutional	1,974	35.0%	1,071	20.6%	-45.7%
Total	5,635	43.8%	5,190	43.2%	-7.9%
Total Group Quarters Population	12,871	100.0%	12,027	100.0%	-6.6%

Table 49.A.13
Overcrowding and Severe Overcrowding
 49. Cuyahoga Urban 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	192,096	99.5%	866	.4%	176	.1%	193,138
2010 ACS	187,082	99.6%	684	.4%	34	.0%	187,800
Renter							
2000 Census	62,457	97.4%	1,027	1.6%	611	1.0%	64,095
2010 ACS	65,377	98.4%	892	1.3%	193	.3%	66,462
Total							
2000 Census	254,553	99.0%	1,893	.7%	787	.3%	257,233
2010 ACS	252,459	99.3%	1,576	.6%	227	.1%	254,262

Table 49.A.14
Households with Incomplete Plumbing Facilities
 49. Cuyahoga Urban County
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Plumbing Facilities	256,586	253,213
Lacking Complete Plumbing Facilities	647	1,049
Total Households	257,233	254,262
Percent Lacking	.3%	.4%

Table 49.A.15
Households with Incomplete Kitchen Facilities
 49. Cuyahoga Urban County
 2000 Census SF3 & 2010 Five-Year ACS Data

Households	2000 Census	2010 ACS
With Complete Kitchen Facilities	256,295	252,147
Lacking Complete Kitchen Facilities	938	2,115
Total Households	257,233	254,262
Percent Lacking	.4%	.8%

Table 49.A.16
Cost Burden and Severe Cost Burden by Tenure
 49. Cuyahoga Urban 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	88,715	73.8%	21,214	17.6%	9,935	8.3%	376	.3%	120,240
2010 ACS	84,247	65.8%	27,839	21.7%	15,577	12.2%	451	.4%	128,114
Owner Without a Mortgage									
2000 Census	49,682	87.5%	4,316	7.6%	2,292	4.0%	512	.9%	56,802
2010 ACS	47,115	78.9%	7,304	12.2%	4,845	8.1%	422	.7%	59,686
Renter									
2000 Census	38,803	60.7%	11,746	18.4%	10,173	15.9%	3,201	5.0%	63,923
2010 ACS	34,097	51.3%	13,918	20.9%	14,688	22.1%	3,759	5.7%	66,462
Total									
2000 Census	177,200	73.5%	37,276	15.5%	22,400	9.3%	4,089	1.7%	240,965
2010 ACS	165,459	65.1%	49,061	19.3%	35,110	13.8%	4,632	1.8%	254,262

B. 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.⁸⁹ The information presented in this section presents detailed HMDA data, including denial rates and predatory lending including high annual percentage rate (APR) loans.

Table 49.B.1
Purpose of Loan by Year
49. Cuyahoga Urban County
2004–2011 HMDA Data

Purpose	2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	20,904	23,528	23,178	15,715	11,038	10,867	9,418	8,397	123,045
Home Improvement	4,139	4,716	4,850	4,493	3,262	1,940	1,452	1,559	26,411
Refinancing	34,516	32,951	27,019	20,321	14,425	22,033	21,441	19,369	192,075
Total	59,559	61,195	55,047	40,529	28,725	34,840	32,311	29,325	341,531

Table 49.B.2
Occupancy Status for Home Purchase Loan Applications
49. Cuyahoga Urban County
2004–2011 HMDA Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	Total
Owner-Occupied	19,334	21,568	20,820	14,063	10,197	10,442	9,044	7,935	113,403
Not Owner-Occupied	1,421	1,901	2,310	1,608	829	414	346	453	9,282
Not Applicable	149	59	48	44	12	11	28	9	360
Total	20,904	23,528	23,178	15,715	11,038	10,867	9,418	8,397	123,045

Table 49.B.3
Owner-Occupied Home Purchase Loan Applications by Loan Type
49. Cuyahoga Urban County
2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Conventional	17,644	19,930	19,551	12,629	6,046	4,743	4,137	4,065	88,745
FHA - Insured	1,491	1,401	1,109	1,242	3,882	5,398	4,585	3,525	22,633
VA - Guaranteed	199	236	160	191	269	297	322	344	2,018
Rural Housing Service or Farm Service Agency	0	1	0	1	0	4	0	1	7
Total	19,334	21,568	20,820	14,063	10,197	10,442	9,044	7,935	113,403

⁸⁹ 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 49.B.4
Loan Applications by Action Taken
 49. Cuyahoga Urban County
 2004–2011 HMDA Data

Action	2004	2005	2006	2007	2008	2009	2010	2011	Total
Loan Originated	11,533	12,330	10,994	7,650	5,686	5,421	4,773	4,124	62,511
Application Approved but not Accepted	1,246	1,380	1,311	789	406	217	268	218	5,835
Application Denied	1,628	2,200	2,507	1,532	950	631	617	628	10,693
Application Withdrawn by Applicant	1,232	1,328	1,242	645	579	482	457	450	6,415
File Closed for Incompleteness	348	351	330	252	136	110	131	82	1,740
Loan Purchased by the Institution	3,347	3,950	4,420	3,182	2,432	3,580	2,798	2,433	26,142
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	19,334	21,568	20,820	14,063	10,197	10,442	9,044	7,935	113,403
Denial Rate	12.4%	15.1%	18.6%	16.7%	14.3%	10.4%	11.4%	13.2%	14.6%

Table 49.B.5
Denial Rates by Gender of Applicant
 49. Cuyahoga Urban County
 2004–2011 HMDA Data

Year	Male	Female	Not Available	Not Applicable	Average
2004	10.5%	13.5%	37.8%	11.1%	12.4%
2005	13.0%	17.4%	30.5%	.0%	15.1%
2006	16.2%	21.5%	29.2%	.0%	18.6%
2007	14.5%	20.0%	21.7%	25.0%	16.7%
2008	12.4%	16.7%	20.7%	33.3%	14.3%
2009	9.1%	11.2%	24.2%	%	10.4%
2010	9.6%	14.5%	13.6%	%	11.4%
2011	12.2%	14.5%	16.8%	.0%	13.2%
Average	12.6%	16.8%	25.9%	12.5%	14.6%

Table 49.B.6
Loan Applications by Selected Action Taken by Gender of Applicant
 49. Cuyahoga Urban County
 2004–2011 HMDA Data

Gender		2004	2005	2006	2007	2008	2009	2010	2011	Total
Male	Originated	7,508	7,678	6,838	4,874	3,504	3,370	2,963	2,546	39,281
	Denied	884	1,145	1,322	828	498	338	313	354	5,682
	Denial Rate	10.5%	13.0%	16.2%	14.5%	12.4%	9.1%	9.6%	12.2%	12.6%
Female	Originated	3,759	4,316	3,786	2,470	1,935	1,879	1,594	1,369	21,108
	Denied	586	909	1,034	619	387	238	270	232	4,275
	Denial Rate	13.5%	17.4%	21.5%	20.0%	16.7%	11.2%	14.5%	14.5%	16.8%
Not Available	Originated	258	332	367	303	245	172	216	208	2,101
	Denied	157	146	151	84	64	55	34	42	733
	Denial Rate	37.8%	30.5%	29.2%	21.7%	20.7%	24.2%	13.6%	16.8%	25.9%
Not Applicable	Originated	8	4	3	3	2	0	0	1	21
	Denied	1	0	0	1	1	0	0	0	3
	Denial Rate	11.1%	.0%	.0%	25.0%	33.3%	%	%	.0%	12.5%
Total	Originated	11,533	12,330	10,994	7,650	5,686	5,421	4,773	4,124	62,511
	Denied	1,628	2,200	2,507	1,532	950	631	617	628	10,693
	Denial Rate	12.4%	15.1%	18.6%	16.7%	14.3%	10.4%	11.4%	13.2%	14.6%

Table 49.B.7
Denial Rates by Race/Ethnicity of Applicant
 49. Cuyahoga Urban County
 2004–2011 HMDA Data

Race/Ethnicity	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	10.3%	34.1%	26.3%	22.6%	33.3%	6.7%	10.0%	16.7%	22.7%
Asian	7.6%	6.9%	8.9%	9.6%	10.9%	12.7%	11.7%	14.4%	9.7%
Black	23.1%	31.0%	38.1%	38.7%	29.7%	19.5%	24.1%	25.7%	31.0%
White	8.5%	10.2%	11.0%	10.7%	10.4%	8.2%	8.7%	10.5%	9.8%
Not Available	31.6%	25.9%	33.3%	25.4%	21.1%	18.4%	15.6%	19.0%	25.9%
Not Applicable	11.1%	.0%	.0%	33.3%	.0%	0%	0%	.0%	9.5%
Average	12.4%	15.1%	18.6%	16.7%	14.3%	10.4%	11.4%	13.2%	14.6%
Non-Hispanic	11.0%	14.0%	17.2%	16.0%	13.5%	9.7%	11.2%	12.7%	13.6%
Hispanic	11.0%	20.1%	19.1%	14.5%	19.2%	11.6%	9.3%	10.9%	15.2%

Table 49.B.8
Loan Applications by Selected Action Taken by Race/Ethnicity of Applicant
 49. Cuyahoga Urban County
 2004–2011 HMDA Data

Race		2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Originated	26	27	28	24	10	14	9	5	143
	Denied	3	14	10	7	5	1	1	1	42
	Denial Rate	10.3%	34.1%	26.3%	22.6%	33.3%	10.0%	10.0%	16.7%	22.7%
Asian	Originated	365	442	327	301	197	226	196	178	2,232
	Denied	30	33	32	32	24	33	26	30	240
	Denial Rate	7.6%	6.9%	8.9%	9.6%	10.9%	12.7%	11.7%	14.4%	9.7%
Black	Originated	1,566	1,826	1,813	985	735	589	558	408	8,480
	Denied	470	821	1,117	621	311	143	177	141	3,801
	Denial Rate	23.1%	31.0%	38.1%	38.7%	29.7%	19.5%	24.1%	25.7%	31.0%
White	Originated	8,905	9,207	8,126	5,819	4,338	4,268	3,665	3,187	47,515
	Denied	823	1,045	1,000	694	502	381	349	375	5,169
	Denial Rate	8.5%	10.2%	11.0%	10.7%	10.4%	8.2%	8.7%	10.5%	9.8%
Not Available	Originated	647	823	696	519	404	324	345	345	4,103
	Denied	299	287	348	177	108	73	64	81	1,437
	Denial Rate	31.6%	25.9%	33.3%	25.4%	21.1%	18.4%	15.6%	19.0%	25.9%
Not Applicable	Originated	24	5	4	2	2	0	0	1	38
	Denied	3	0	0	1	0	0	0	0	4
	Denial Rate	31.6%	25.9%	33.3%	25.4%	21.1%	18.4%	15.6%	19.0%	9.5%
Total	Originated	11,533	12,330	10,994	7,650	5,686	5,421	4,773	4,124	62,511
	Denied	1,628	2,200	2,507	1,532	950	631	617	628	10,693
	Denial Rate	12.4%	15.1%	18.6%	16.7%	14.3%	10.4%	11.4%	13.2%	14.6%
Non-Hispanic	Originated	9,568	11,163	10,079	6,979	5,194	5,007	4,345	3,720	56,055
	Denied	1,177	1,821	2,101	1,326	810	536	548	542	8,861
	Denial Rate	11.0%	14.0%	17.2%	16.0%	13.5%	9.7%	11.2%	12.7%	13.6%
Hispanic	Originated	186	175	212	147	84	99	97	90	1,090
	Denied	23	44	50	25	20	13	10	11	196
	Denial Rate	11.0%	20.1%	19.1%	14.5%	19.2%	11.6%	9.3%	10.9%	15.2%

Table 49.B.9
Loan Applications by Reason for Denial
 49. Cuyahoga Urban County
 2004–2011 HMDA Data

Denial Reason	2004	2005	2006	2007	2008	2009	2010	2011	Total
Debt-to-Income Ratio	214	287	260	257	179	137	151	149	1,634
Employment History	23	22	41	22	20	15	14	22	179
Credit History	327	392	380	328	217	148	143	131	2,066
Collateral	107	171	210	152	175	125	112	105	1,157
Insufficient Cash	47	27	51	31	21	18	23	20	238
Unverifiable Information	45	80	135	97	57	33	28	21	496
Credit Application Incomplete	197	199	179	203	62	36	54	69	999
Mortgage Insurance Denied	0	1	3	2	5	4	4	3	22
Other	311	585	468	209	103	56	49	44	1,825
Missing	357	436	780	231	111	59	39	64	2,077
Total	1,628	2,200	2,507	1,532	950	631	617	628	10,693

Table 49.B.10
Denial Rates by Income of Applicant
 49. Cuyahoga Urban County
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	42.1%	53.1%	52.1%	46.7%	56.0%	80.8%	65.2%	68.4%	54.6%
\$15,001–\$30,000	23.8%	30.6%	31.7%	30.1%	27.4%	19.4%	23.9%	22.0%	26.9%
\$30,001–\$45,000	15.1%	18.0%	21.1%	20.9%	18.7%	11.8%	14.9%	17.2%	17.6%
\$45,001–\$60,000	12.5%	14.8%	20.4%	16.7%	15.2%	10.0%	10.1%	12.7%	14.8%
\$60,001–\$75,000	10.5%	12.7%	18.1%	15.2%	12.1%	8.9%	12.0%	11.3%	13.1%
Above \$75,000	7.2%	10.4%	14.3%	12.5%	9.0%	7.2%	6.3%	9.7%	10.2%
Data Missing	18.4%	17.0%	13.3%	21.5%	21.8%	10.7%	28.6%	17.7%	17.3%
Total	12.4%	15.1%	18.6%	16.7%	14.3%	10.4%	11.4%	13.2%	14.6%

Table 49.B.11
Denial Rates of Loans by Race/Ethnicity and Income of Applicant
 49. Cuyahoga Urban 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%	15.8%	16.0%	27.4%	40.0%	22.7%
Asian	63.6%	23.8%	12.6%	8.5%	10.7%	7.5%	12.1%	9.7%
Black	77.1%	40.8%	30.8%	27.6%	26.9%	29.9%	36.5%	31.0%
White	48.6%	18.1%	11.4%	10.3%	9.6%	7.1%	10.7%	9.8%
Not Available	56.3%	46.7%	32.0%	26.4%	22.7%	16.8%	43.7%	25.9%
Not Applicable	%	100.0%	.0%	20.0%	.0%	3.8%	50.0%	9.5%
Average	54.6%	26.9%	17.6%	14.8%	13.1%	10.2%	17.3%	14.6%
Non-Hispanic Ethnicity	52.1%	25.0%	16.5%	13.9%	12.5%	9.6%	14.1%	13.6%
Hispanic (Ethnicity)	60.0%	27.5%	15.6%	16.0%	16.8%	10.0%	8.8%	15.2%

Table 49.B.12
Loan Applications by Reason for Denial by Race/Ethnicity of Applicant
 49. Cuyahoga Urban County
 2004–2011 HMDA Data

Denial Reason	American Indian	Asian	Black	White	Not Available	Not Applicable	Total	Hispanic (Ethnicity)
Debt-to-Income Ratio	5	48	540	878	162	1	1,634	28
Employment History	0	10	49	105	15	0	179	6
Credit History	6	38	807	999	216	0	2,066	44
Collateral	8	27	312	677	133	0	1,157	29
Insufficient Cash	1	6	70	132	29	0	238	4
Unverifiable Information	4	15	172	251	52	2	496	14
Credit Application Incomplete	4	31	250	545	169	0	999	10
Mortgage Insurance Denied	1	3	4	12	2	0	22	1
Other	9	42	745	756	273	0	1,825	30
Missing	4	20	852	814	386	1	2,077	30
Total	42	240	3,801	5,169	1,437	4	10,693	196
% Missing	9.5%	8.3%	22.4%	15.7%	26.9%	25.0%	19.4%	15.3%

Table 49.B.13
Loan Applications by Income of Applicant: Originated and Denied
 49. Cuyahoga Urban County
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Loan Originated	33	30	34	16	11	5	8	6	143
	Application Denied	24	34	37	14	14	21	15	13	172
	Denial Rate	42.1%	53.1%	52.1%	46.7%	56.0%	80.8%	65.2%	68.4%	54.6%
\$15,001–\$30,000	Loan Originated	804	786	576	437	345	428	363	320	4,059
	Application Denied	251	347	267	188	130	103	114	90	1,490
	Denial Rate	23.8%	30.6%	31.7%	30.1%	27.4%	19.4%	23.9%	22.0%	26.9%
\$30,001–\$45,000	Loan Originated	2,241	2,444	2,048	1,351	1,148	1,141	854	729	11,956
	Application Denied	399	537	548	357	264	153	150	151	2,559
	Denial Rate	15.1%	18.0%	21.1%	20.9%	18.7%	11.8%	14.9%	17.2%	17.6%
\$45,001–\$60,000	Loan Originated	2,300	2,387	2,072	1,416	1,078	1,140	850	720	11,963
	Application Denied	328	415	531	284	193	126	96	105	2,078
	Denial Rate	12.5%	14.8%	20.4%	16.7%	15.2%	10.0%	10.1%	12.7%	14.8%
\$60,001–\$75,000	Loan Originated	1,590	1,772	1,519	995	775	705	600	517	8,473
	Application Denied	187	257	336	178	107	69	82	66	1,282
	Denial Rate	10.5%	12.7%	18.1%	15.2%	12.1%	8.9%	12.0%	11.3%	13.1%
Above \$75,000	Loan Originated	3,978	4,456	4,294	3,271	2,268	1,927	2,043	1,781	24,018
	Application Denied	307	517	719	466	225	150	138	192	2,714
	Denial Rate	7.2%	10.4%	14.3%	12.5%	9.0%	7.2%	6.3%	9.7%	10.2%
Data Missing	Loan Originated	587	455	451	164	61	75	55	51	1,899
	Application Denied	132	93	69	45	17	9	22	11	398
	Denial Rate	18.4%	17.0%	13.3%	21.5%	21.8%	10.7%	28.6%	17.7%	17.3%
Total	Loan Originated	11,533	12,330	10,994	7,650	5,686	5,421	4,773	4,124	62,511
	Application Denied	1,628	2,200	2,507	1,532	950	631	617	628	10,693
	Denial Rate	12.4%	15.1%	18.6%	16.7%	14.3%	10.4%	11.4%	13.2%	14.6%

Table 49.B.14
Loan Applications by Income and Race/Ethnicity of Applicant: Originated and Denied
 49. Cuyahoga Urban 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	32	21	53	3	143
	Application Denied	0	7	3	6	4	20	2	42
	Denial Rate	%	53.8%	9.7%	15.8%	16.0%	27.4%	40.0%	22.7%
Asian	Loan Originated	4	80	263	323	275	1,236	51	2,232
	Application Denied	7	25	38	30	33	100	7	240
	Denial Rate	63.6%	23.8%	12.6%	8.5%	10.7%	7.5%	12.1%	9.7%
Black	Loan Originated	11	902	2,487	2,038	1,097	1,792	153	8,480
	Application Denied	37	622	1,107	778	403	766	88	3,801
	Denial Rate	77.1%	40.8%	30.8%	27.6%	26.9%	29.9%	36.5%	31.0%
White	Loan Originated	107	2,835	8,489	8,872	6,573	19,096	1,543	47,515
	Application Denied	101	628	1,088	1,014	694	1,459	185	5,169
	Denial Rate	48.6%	18.1%	11.4%	10.3%	9.6%	7.1%	10.7%	9.8%
Not Available	Loan Originated	21	236	685	694	503	1,816	148	4,103
	Application Denied	27	207	323	249	148	368	115	1,437
	Denial Rate	56.3%	46.7%	32.0%	26.4%	22.7%	16.8%	43.7%	25.9%
Not Applicable	Loan Originated	0	0	4	4	4	25	1	38
	Application Denied	0	1	0	1	0	1	1	4
	Denial Rate	%	100.0%	.0%	20.0%	.0%	3.8%	50.0%	9.5%
Total	Loan Originated	143	4,059	11,956	11,963	8,473	24,018	1,899	62,511
	Application Denied	172	1,490	2,559	2,078	1,282	2,714	398	10,693
	Denial Rate	54.6%	26.9%	17.6%	14.8%	13.1%	10.2%	17.3%	14.6%
Non-Hispanic Ethnicity	Loan Originated	123	3,674	10,830	10,809	7,644	21,302	1,673	56,055
	Application Denied	134	1,223	2,137	1,741	1,089	2,262	275	8,861
	Denial Rate	52.1%	25.0%	16.5%	13.9%	12.5%	9.6%	14.1%	13.6%
Hispanic (Ethnicity)	Loan Originated	4	87	232	205	144	387	31	1,090
	Application Denied	6	33	43	39	29	43	3	196
	Denial Rate	60.0%	27.5%	15.6%	16.0%	16.8%	10.0%	8.8%	15.2%

PREDATORY LENDING

Table 49.B.15
Originated Owner-Occupied Loans by HAL Status
 49. Cuyahoga Urban County
 2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Other	10,337	9,719	8,573	6,847	5,291	5,189	4,743	4,120	54,819
HAL	1,196	2,611	2,421	803	395	232	30	4	7,692
Total	11,533	12,330	10,994	7,650	5,686	5,421	4,773	4,124	62,511
Percent HAL	10.4%	21.2%	22.0%	10.5%	6.9%	4.3%	.6%	.1%	12.3%

Table 49.B.16
Loans by Loan Purpose by HAL Status
 49. Cuyahoga Urban County
 2004–2011 HMDA Data

Loan Purpose		2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	Other	10,337	9,719	8,573	6,847	5,291	5,189	4,743	4,120	54,819
	HAL	1,196	2,611	2,421	803	395	232	30	4	7,692
	Percent HAL	10.4%	21.2%	22.0%	10.5%	6.9%	4.3%	.6%	.1%	12.3%
Home Improvement	Other	1,266	1,505	1,658	1,515	1,044	500	445	493	8,426
	HAL	231	278	337	225	107	59	29	18	1,284
	Percent HAL	15.4%	15.6%	16.9%	12.9%	9.3%	10.6%	6.1%	3.5%	13.2%
Refinancing	Other	11,751	8,912	6,524	5,340	4,488	9,985	10,580	9,107	66,687
	HAL	1,768	2,872	2,591	1,196	437	310	51	37	9,262
	Percent HAL	13.1%	24.4%	28.4%	18.3%	8.9%	3.0%	.5%	.4%	12.2%
Total	Other	23,354	20,136	16,755	13,702	10,823	15,674	15,768	13,720	129,932
	HAL	3,195	5,761	5,349	2,224	395	232	30	4	18,238
	Percent HAL	12.0%	22.2%	24.2%	14.0%	8.0%	3.7%	.7%	.4%	12.3%

Table 49.B.17
HALs Originated by Race of Borrower
 49. Cuyahoga Urban 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	27	27	13	5	5	0	0	87
Black	456	963	1,072	309	98	56	6	0	2,960
White	577	1,247	1,107	416	274	164	23	3	3,811
Not Available	149	369	203	64	17	6	1	1	810
Not Applicable	2	0	0	0	0	0	0	0	2
Total	1,196	2,611	2,421	803	395	232	30	4	7,692
Hispanic (Ethnicity)	22	32	61	24	15	3	0	1	158

Table 49.B.18
Rate of HALs Originated by Race/Ethnicity of Borrower
 49. Cuyahoga Urban County
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	7.7%	18.5%	42.9%	4.2%	10.0%	7.1%	.0%	.0%	15.4%
Asian	2.7%	6.1%	8.3%	4.3%	2.5%	2.2%	.0%	.0%	3.9%
Black	29.1%	52.7%	59.1%	31.4%	13.3%	9.5%	1.1%	.0%	34.9%
White	6.5%	13.5%	13.6%	7.1%	6.3%	3.8%	.6%	.1%	8.0%
Not Available	23.0%	44.8%	29.2%	12.3%	4.2%	1.9%	.3%	.3%	19.7%
Not Applicable	8.3%	.0%	.0%	.0%	.0%	%	%	.0%	5%
Average	10.4%	21.2%	22.0%	10.5%	6.9%	4.3%	0.6%	0.1%	12.3%
Non-Hispanic Ethnicity	9.6%	18.9%	21.4%	10.3%	7.0%	4.4%	.7%	.1%	11.6%
Hispanic (Ethnicity)	11.8%	18.3%	28.8%	16.3%	17.9%	3.0%	.0%	1.1%	14.5%

Table 49.B.19
Loans by HAL Status by Race/Ethnicity of Borrower
 49. Cuyahoga Urban County
 2004–2011 HMDA Data

Race	Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Other	24	22	16	23	9	13	9	5	121
	HAL	2	5	12	1	1	1	0	0	22
	Percent HAL	7.7%	18.5%	42.9%	4.2%	10.0%	7.1%	.0%	.0%	15.4%
Asian	Other	355	415	300	288	192	221	196	178	2,145
	HAL	10	27	27	13	5	5	0	0	87
	Percent HAL	2.7%	6.1%	8.3%	4.3%	2.5%	2.2%	.0%	.0%	3.9%
Black	Other	1,110	863	741	676	637	533	552	408	5,520
	HAL	456	963	1,072	309	98	56	6	0	2,960
	Percent HAL	29.1%	52.7%	59.1%	31.4%	13.3%	9.5%	1.1%	.0%	34.9%
White	Other	8,328	7,960	7,019	5,403	4,064	4,104	3,642	3,184	43,704
	HAL	577	1,247	1,107	416	274	164	23	3	3,811
	Percent HAL	6.5%	13.5%	13.6%	7.1%	6.3%	3.8%	0.6%	0.1%	8.0%
Not Available	Other	498	454	493	455	387	318	344	344	3,293
	HAL	149	369	203	64	17	6	1	1	810
	Percent HAL	23.0%	44.8%	29.2%	12.3%	4.2%	1.9%	.3%	.3%	19.7%
Not Applicable	Other	22	5	4	2	2	0	0	0	36
	HAL	2	0	0	0	0	0	0	0	2
	Percent HAL	8.3%	.0%	.0%	.0%	.0%	%	%	.0%	5.0%
Total	Other	10,337	9,719	8,573	6,847	5,291	5,189	4,743	4,120	54,819
	HAL	1,196	2,611	2,421	803	395	232	30	4	7,692
	Percent HAL	10.4%	21.2%	22.0%	10.5%	6.9%	4.3%	.6%	.1%	12.3%
Non-Hispanic Ethnicity	Other	8,653	9,053	7,925	6,259	4,833	4,787	4,316	3,718	49,544
	HAL	915	2,110	2,154	720	361	220	29	2	6,511
	Percent HAL	9.6%	18.9%	21.4%	10.3%	7.0%	4.4%	.7%	.1%	11.6%
Hispanic (Ethnicity)	Other	164	143	151	123	69	96	97	89	932
	HAL	22	32	61	24	15	3	0	1	158
	Percent HAL	11.8%	18.3%	28.8%	16.3%	17.9%	3.0%	.0%	1.1%	14.5%

Table 49.B.20
Rates of HALs by Income of Borrower
 49. Cuyahoga Urban County
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Average
\$15,000 or Below	3.0%	10.0%	5.9%	6.3%	9.1%	.0%	.0%	.0%	5.6%
\$15,001–\$30,000	15.2%	26.6%	25.7%	14.4%	9.0%	5.1%	1.7%	.0%	14.8%
\$30,001–\$45,000	15.0%	28.6%	31.1%	15.0%	10.8%	7.5%	.6%	.0%	17.5%
\$45,001–\$60,000	13.8%	28.9%	25.3%	13.6%	8.5%	4.4%	.5%	.3%	15.6%
\$60,001–\$75,000	10.6%	20.3%	24.9%	10.2%	7.0%	4.5%	.7%	.0%	12.9%
Above \$75,000	5.6%	12.7%	14.2%	6.5%	3.9%	2.1%	0.5%	.1%	7.3%
Data Missing	4.8%	18.5%	27.5%	18.9%	6.6%	2.7%	.0%	.0%	14.4%
Average	10.4%	21.2%	22.0%	10.5%	6.9%	4.3%	.6%	.1%	12.3%

Table 49.B.21
Loans by HAL Status by Income of Borrower
 49. Cuyahoga Urban County
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Other	32	27	32	15	10	5	8	6	135
	HAL	1	3	2	1	1	0	0	0	8
	Percent HAL	3.0%	10.0%	5.9%	6.3%	9.1%	.0%	.0%	.0%	5.6%
\$15,001–\$30,000	Other	682	577	428	374	314	406	357	320	3,458
	HAL	122	209	148	63	31	22	6	0	601
	Percent HAL	15.2%	26.6%	25.7%	14.4%	9.0%	5.1%	1.7%	.0%	14.8%
\$30,001–\$45,000	Other	1,904	1,744	1,411	1,148	1,024	1,055	849	729	9,864
	HAL	337	700	637	203	124	86	5	0	2,092
	Percent HAL	15.0%	28.6%	31.1%	15.0%	10.8%	7.5%	.6%	.0%	17.5%
\$45,001 – \$60,000	Other	1,983	1,697	1,548	1,224	986	1,090	846	718	10,092
	HAL	317	690	524	192	92	50	4	2	1,871
	Percent HAL	13.8%	28.9%	25.3%	13.6%	8.5%	4.4%	.5%	.3%	15.6%
\$60,001–\$75,000	Other	1,422	1,413	1,141	894	721	673	596	517	7,377
	HAL	168	359	378	101	54	32	4	0	1,096
	Percent HAL	10.6%	20.3%	24.9%	10.2%	7.0%	4.5%	.7%	.0%	12.9%
Above \$75,000	Other	3,755	3,890	3,686	3,059	2,179	1,887	2,032	1,779	22,267
	HAL	223	566	608	212	89	40	11	2	1,751
	Percent HAL	5.6%	12.7%	14.2%	6.5%	3.9%	2.1%	.5%	.1%	7.3%
Data Missing	Other	559	371	327	133	57	73	55	51	1,626
	HAL	28	84	124	31	4	2	0	0	273
	Percent HAL	4.8%	18.5%	27.5%	18.9%	6.6%	2.7%	.0%	.0%	14.4%
Total	Other	10,337	9,719	8,573	6,847	5,291	5,189	4,743	4,120	54,819
	HAL	1,196	2,611	2,421	803	395	232	30	4	7,692
	Percent HAL	10.4%	21.2%	22.0%	10.5%	6.9%	4.3%	.6%	.1%	12.3%

C. CRA DATA

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

Table 49.C.1
Small Business Loans Originated: \$100,000 or Less by Tract MFI
 49. Cuyahoga Urban 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	7,311	0	11,783
2001	0	232	5,121	7,613	0	12,966
2002	0	289	5,875	9,070	0	15,234
2003	0	781	5,671	9,732	0	16,184
2004	0	772	5,680	9,466	0	15,918
2005	0	853	5,806	10,278	0	16,937
2006	0	1,191	8,490	16,161	0	25,842
2007	0	1,158	8,922	17,945	0	28,025
2008	0	989	6,748	13,858	0	21,595
2009	0	460	2,998	6,287	0	9,745
2010	0	420	2,751	5,759	0	8,930
2011	0	487	3,334	6,993	0	10,814
Total	0	7,840	65,660	120,473	0	193,973
Loan Amount (\$1,000s)						
2000	0	2,777	55,412	86,654	0	144,843
2001	0	3,140	59,287	88,928	0	151,355
2002	0	4,365	68,032	110,421	0	182,818
2003	0	8,780	64,599	105,499	0	178,878
2004	0	9,773	61,572	107,569	0	178,914
2005	0	11,732	73,442	128,543	0	213,717
2006	0	12,797	89,932	169,256	0	271,985
2007	0	12,814	93,833	193,817	0	300,464
2008	0	11,656	75,528	152,172	0	239,356
2009	0	7,318	41,786	78,109	0	127,213
2010	0	6,846	43,590	83,650	0	134,086
2011	0	8,213	53,029	103,804	0	165,046
Total	0	100,211	780,042	1,408,422	0	2,288,675

Table 49.C.2
Small Business Loans Originated: \$100,001 to \$250,000 by Tract MFI
 49. Cuyahoga Urban 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	265	0	452
2001	0	16	216	343	0	575
2002	0	19	239	434	0	692
2003	0	33	199	341	0	573
2004	0	36	174	334	0	544
2005	0	40	178	339	0	557
2006	0	38	170	325	0	533
2007	0	36	184	278	0	498
2008	0	29	177	296	0	502
2009	0	29	137	224	0	390
2010	0	22	189	311	0	522
2011	0	27	188	325	0	540
Total	0	337	2,226	3,815	0	6,378
Loan Amount (\$1,000s)						
2000	0	2,307	30,822	46,013	0	79,142
2001	0	3,288	39,808	61,569	0	104,665
2002	0	3,901	43,944	75,544	0	123,389
2003	0	6,284	36,444	60,373	0	103,101
2004	0	6,954	31,496	59,803	0	98,253
2005	0	7,474	32,885	60,339	0	100,698
2006	0	6,580	31,062	57,798	0	95,440
2007	0	6,462	33,684	49,282	0	89,428
2008	0	5,278	30,879	52,538	0	88,695
2009	0	5,096	24,857	39,602	0	69,555
2010	0	3,846	35,745	55,029	0	94,620
2011	0	4,480	33,915	58,369	0	96,764
Total	0	61,950	405,541	676,259	0	1,143,750

Table 49.C.3
Small Business Loans Originated: More than \$250,000 by Tract MFI
 49. Cuyahoga Urban 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	269	0	476
2001	0	19	262	357	0	638
2002	0	27	304	462	0	793
2003	0	46	243	376	0	665
2004	0	60	251	397	0	708
2005	0	44	256	431	0	731
2006	0	50	214	409	0	673
2007	0	35	219	367	0	621
2008	0	51	158	341	0	550
2009	0	38	167	292	0	497
2010	0	60	236	394	0	690
2011	0	51	214	353	0	618
Total	0	492	2,720	4,448	0	7,660
Loan Amount (\$1,000s)						
2000	0	6,652	100,594	142,372	0	249,618
2001	0	10,440	139,293	198,415	0	348,148
2002	0	17,443	167,685	253,297	0	438,425
2003	0	26,408	127,461	208,682	0	362,551
2004	0	36,426	135,865	217,467	0	389,758
2005	0	24,071	141,621	247,431	0	413,123
2006	0	29,838	121,789	232,907	0	384,534
2007	0	19,077	116,474	214,914	0	350,465
2008	0	30,274	85,730	195,862	0	311,866
2009	0	22,723	89,066	160,402	0	272,191
2010	0	37,248	134,495	220,976	0	392,719
2011	0	29,002	113,190	184,527	0	326,719
Total	0	289,602	1,473,263	2,477,252	0	4,240,117

Table 49.C.4
Small Business Loans to Businesses with Gross Annual Revenues of Less Than \$1 Million by Tract MFI
 49. Cuyahoga Urban 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	2,827	0	4,554
2001	0	131	2,239	3,355	0	5,725
2002	0	109	1,608	2,778	0	4,495
2003	0	274	1,887	3,453	0	5,614
2004	0	279	1,826	3,333	0	5,438
2005	0	354	2,701	4,942	0	7,997
2006	0	381	3,177	5,730	0	9,288
2007	0	418	3,289	6,170	0	9,877
2008	0	291	2,111	3,810	0	6,212
2009	0	168	1,153	2,031	0	3,352
2010	0	152	1,036	1,936	0	3,124
2011	0	208	1,487	3,171	0	4,866
Total	0	2,836	24,170	43,536	0	70,542
Loan Amount (\$1,000s)						
2000	0	3,171	73,137	120,312	0	196,620
2001	0	6,719	83,423	145,889	0	236,031
2002	0	14,006	108,367	192,944	0	315,317
2003	0	13,922	89,430	153,576	0	256,928
2004	0	16,692	74,385	134,465	0	225,542
2005	0	14,458	86,343	159,900	0	260,701
2006	0	8,514	91,216	170,214	0	269,944
2007	0	10,211	81,659	151,733	0	243,603
2008	0	10,024	54,358	111,288	0	175,670
2009	0	7,571	40,750	74,011	0	122,332
2010	0	8,522	44,906	90,982	0	144,410
2011	0	11,043	46,084	98,125	0	155,252
Total	0	124,853	874,058	1,603,439	0	2,602,350

D. 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 49.D.1
Fair Housing Complaints by Basis
 49. Cuyahoga Urban 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	15	9	10	14	5	86
Family Status	4	3	11	3	2	14	4	16	8	65
National Origin	1	2	6	5	17	5	6	2	0	44
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	60	58	36	48	20	336
Total Complaints	21	19	31	23	43	54	36	38	19	284

Table 49.D.2
Fair Housing Complaints by Issue
 49. Cuyahoga Urban 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	13	3	5	3	4	53
Discriminatory terms, conditions, privileges, or services and facilities	0	1	6	5	12	8	8	9	2	51
False denial or representation of availability			2		3					5
Other discriminatory acts	1	0		0	0		0	2	2	5
Failure to make reasonable accommodation	3	3	7	4	7	2	6	10	3	45
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
Using ordinances to discriminate in zoning and land use	1	1	0		2					4
Discriminatory advertising - sale					1	2				3
Discriminatory advertising, statements, and notices	2	1	2	3	1	3	2	8	4	26
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	4	2	24
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	54	65	48	57	27	386
Total Complaints	21	19	31	23	43	54	36	38	19	284

Table 49.D.3
Fair Housing Complaints by Closure Status
 49. Cuyahoga Urban County
 2004–2012 HUD Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Administrative Closure Cause (FHAP)	3	3	2	4	6	11	9	0	0	38
Charged (HUD)	1	3	6	1	2	13	3	8	2	39
Conciliated / Settled						1				1
DOJ Closure	10	5	14	8	16	14	19	10	2	98
No Cause	1				2					3
Open	6	8	9	10	17	14	5	11		80
						1		9	15	25
Total Complaints	21	19	31	23	43	54	36	38	19	284

HUD Complaints Found With Cause

Table 49.D.4
Fair Housing Complaints Found With Cause by Basis
 49. Cuyahoga Urban County
 2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
Disability	4	5	6	4	7	4	5	7	1	43
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	29	31	22	22	4	165
Total Complaints	12	8	20	9	20	28	22	18	4	141

Table 49.D.5
Fair Housing Complaints Found With Cause by Issue
 49. Cuyahoga Urban 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
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
Using ordinances to discriminate in zoning and land use	1		0		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	29	38	25	27	5	192
Total Complaints	12	8	20	9	20	28	22	18	4	141

OHIO CIVIL RIGHTS COMMISSION COMPLAINTS

Table 49.D.6
Fair Housing Complaints by Basis
 49. Cuyahoga Urban 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	8	9	25	8	19	11	12	15	2	109
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	17	2	4	3		38
Race	12	10	12	19	15	15	15	11	2	116
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	27	28	51	46	68	41	51	52	6	370
Total Complaints	24	22	44	33	44	36	46	33	4	286

Table 49.D.7
Fair Housing Complaints by Issue
 49. Cuyahoga Urban County
 2004–2012 OCRRC Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
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Advertising	3	0	0		1	3	4	4	0	15
Exclusion	7	9	4	7	14	1	3			45
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
Sexual Harassment	0	0	0	0	1	0	0	1	1	3
Terms and Conditions	4	8	10	12	20	9	10	13	2	88
Total Issues	31	28	48	40	58	38	53	38	6	340
Total Complaints	24	22	44	33	44	36	46	33	4	286

Table 49.D.8
Fair Housing Complaints by Closure Status
 49. Cuyahoga Urban County
 2004–2012 OCRC 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	9	9	14	18	15	12	7	14	1	99
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	7	3	10	5	2	51
Total Complaints	24	22	44	33	44	36	46	33	4	286

E. FAIR HOUSING SURVEY FOR HOUSING STAKEHOLDERS DATA

No responses were received from the Cuyahoga Urban County in the 2012–2013 Fair Housing Survey for Housing Stakeholders.

F. LAND USE PLANNING SURVEY DATA

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.

G. IMPEDIMENTS

The *2013 Northeast Ohio Regional Analysis of Impediments to Fair Housing Choice* uncovered several potential issues regarding fair housing in the Cuyahoga Urban 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 Urban 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 in the Urban County.

Results of the Fair Housing Surveys indicate that a number of local communities in the Cuyahoga Urban County lack or do not have sufficient policies or practices to completely address the duty to affirmatively further fair housing.

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 Urban County. The challenges faced in the fair housing arena in the Urban County are too large for the current resource

commitment to conquer. This was supported by input received in the Fair Housing Survey as well as in the fair housing forums.

Suggestion: Conduct even more outreach and educational activities in a uniform, methodical, and consistent fashion. This should be done in consort with other for-profit, non-profit, and 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 Urban County 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 in selected areas of the Urban County. 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 49.G.1
Impediments Matrix
 49. Cuyahoga Urban 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 ⁹⁰		
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	Lack of inclusionary policies							X		X	All	M

⁹⁰ 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.

