

State of Ohio Analysis of Impediments

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Executive Summary

Ohio Fair Housing Law

The Ohio Fair Housing Law (Ohio Revised Code 4112.02(h)) gives all persons in the federally protected classes the right to live wherever they can afford to buy a home or rent an apartment. The Ohio law also adds two additional protected classes: ancestry and military status. According to Ohio law, it is unlawful, on the basis of race, color, religion, sex, national origin, ancestry, military status, disability, or familial status to:

- Refuse to rent, sell, finance, or insure housing accommodations or residential property
- Represent to any person that housing accommodations are not available for inspection, sale, rental, or lease
- Refuse to lend money for the purchase, construction, repair, rehabilitation, or maintenance of housing accommodations or rental property
- Discriminate against any person in the purchase, renewal, or terms and conditions of fire, extended coverage, of homeowners or renter's insurance
- Refuse to consider without prejudice the combined income of both spouses
- Print, publish, or circulate any statement or advertisement which would indicate a preference or limitation
- Deny any person membership in any multiple listing services or real estate broker's organization

No one may take any of the following actions based on race, color, national origin, religion, sex, familial status, or disability:

- Refuse to make a mortgage loan
- Fail to provide information regarding loans
- Deny or make different terms for home loans, such as different interest rates, points, or fees
- Discriminate in appraising the property
- Refuse to purchase the loan or set different terms or conditions for purchasing a loan.

In addition, it is illegal for anyone to:

- Coerce, intimidate, threaten, or interfere with anyone exercising their rights granted under the Fair Housing Act or assisting others who are exercising that right
- Make, print, publish, or post statements or advertisements that a house or an apartment is available only to persons of a certain race, color, religion, sex, familial status, or disability

In Ohio, the Ohio Civil Rights Commission enforces state laws against discrimination. The Commission receives and investigates discrimination charges – on the basis of protected class – in the areas of employment, public accommodation, housing, credit and disability in higher education.

Federal Fair Housing Law

Title VIII of the Civil Rights Act of 1968, and amended in 1988, is also known as The Fair Housing Act. The Act prohibits discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions, based on race, color, national origin, religion, sex, familial status (including children under the age of 18 living with parents or legal custodians, pregnant women, and people securing custody of children under the age of 18), and disability.

The Fair Housing Act covers most housing. In some situations, owner-occupied buildings with up to four units, single-family housing sales or rentals that did not use a real estate agent or broker and housing operated by private clubs and organizations that only allow members to occupy units are exempt from the law.

The U. S. Department of Housing and Urban Development (HUD) is the federal agency charged with enforcing the Fair Housing Act. When an individual files a complaint, HUD will notify the complainant and will also:

- Notify the alleged violator of the complaint and allow the party to submit a response
- Investigate the complaint and determine whether there is reasonable cause to believe a violation occurred
- Notify the complainant if HUD cannot complete an investigation within 100 days of receiving the complaint.

HUD will try to reach an agreement with the alleged violator (respondent). The conciliation agreement must protect both the complainant and the public interest. If the respondent signs a conciliation agreement, HUD will take no further action on the complaint. If, however, HUD has reasonable cause to believe that the respondent breached the conciliation agreement, it will recommend that the U.S. Attorney General file suit.

HUD requires communities receiving funds under the Community Development Block Grant program to certify that they affirmatively further fair housing as part of their consolidated planning process.

While not defined in statute, HUD describes the obligation to affirmatively further fair housing as a process consisting of three components:

1. Complete an Analysis of Impediments to Fair Housing Choice
2. Implement actions in order to overcome the identified impediments
3. Document the actions taken in order to overcome these impediments

Methodology

The process for the Analysis of Impediments is a comprehensive examination of data related to housing, affirmatively furthering fair housing, housing transactions/conditions and the fair housing program’s delivery system. The main sources of data for this report includes 2009-2013 American Community Survey data and data collected from federal and state agencies that relate to demographic and housing characteristics within Ohio.

Jurisdictions in Ohio that receive funds from HUD directly are known as entitlement communities. These communities report to HUD. Data that contains information on these areas are identified. This report serves as the Analysis of Impediments to Fair Housing Choice for the State of Ohio’s non-entitlement communities, which are communities that do not have a direct relationship with HUD and receive funds from the State of Ohio (Table 1). The non-entitlement communities are the focus of this Analysis of Impediment.

Table 1: Ohio Non-entitlement Counties							
Adams	Clark	Fairfield	Henry	Logan	Monroe	Preble	Union
Allen	Clermont	Fayette	Highland	Lorain	Morgan	Putnam	Van Wert
Ashland	Clinton	Fulton	Hocking	Lucas	Morrow	Richland	Vinton
Ashtabula	Columbiana	Gallia	Holmes	Madison	Muskingum	Ross	Washington
Athens	Coshocton	Geauga	Huron	Mahoning	Noble	Sandusky	Wayne
Auglaize	Crawford	Greene	Jackson	Marion	Ottawa	Scioto	Williams
Belmont	Darke	Guernsey	Jefferson	Medina	Paulding	Seneca	Wood
Brown	Defiance	Hancock	Knox	Meigs	Perry	Shelby	Wyandot
Carroll	Delaware	Hardin	Lawrence	Mercer	Pickaway	Trumbull	
Champaign	Erie	Harrison	Licking	Miami	Pike	Tuscarawas	
Ohio Non-entitlement Cities							
Ashland	Delaware	Medina	Oregon	Troy			
Ashtabula	Findlay	Mount Vernon	Piqua	Wadsworth			
Athens	Fremont	New Philadelphia	Portsmouth	Wooster			
Chillicothe	Marion	Niles	Sidney	Xenia			
Defiance	Marysville	Norwalk	Tiffin	Zanesville			

Fair Housing Impediments

After analyzing the compiled data for the Analysis of Impediments, the state identified four impediments to fair housing. These identified impediments are the focus of the state's action plan:

1. Housing needs for the disabled

Disabled residents comprise 13 percent of the state's population. In the Appalachian region, disabled residents comprise between 25 and 50 percent of the total population. The supply of affordable housing units in rural areas is not sufficient to meet demand for the disabled Ohioans.

2. Housing for older adults

By 2030, nearly 30 percent of Ohio's population will be 55 years or older. Many older adults also have an accompanying disability, the most common being ambulatory. In addition to increasing the stock of affordable housing options for an older population, Ohio will need to increase the affordable housing stock for disabled older adults who may need more specialized services than the general disabled population.

3. Educating Hispanic populations about fair housing rights

Ohio's Hispanic population grew 76 percent since 2000. In north and northwest Ohio, there is a large Hispanic migrant worker population. Communities will have to identify ways to educate Spanish-speaking residents on their fair housing rights and regulations.

4. Access to public transit in rural areas

In Ohio, 34 rural transit agencies need to replace 25 percent of the existing fleet, which includes vehicles that have past their useful life and provide more services to low- and moderate-income individuals and older adults. Currently, 27 counties do not have any existing public transit services. By 2025, as Ohio's rural population grows older and rely more on public transit, these counties will need to provide more than 4 million trips per year.

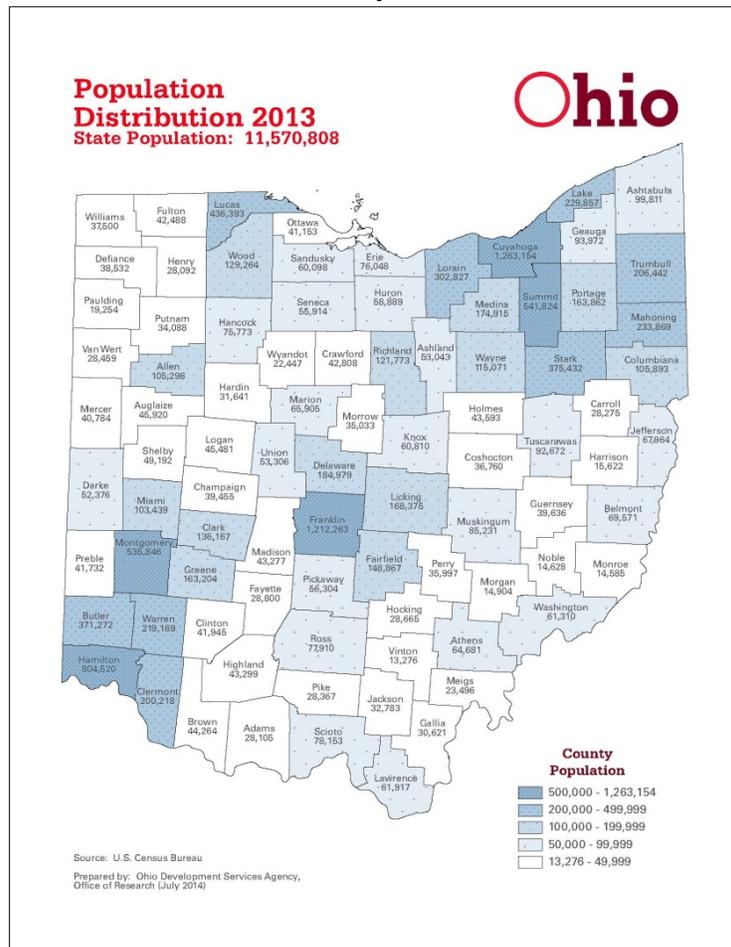
Section 1: State Overview

Ohio is the 7th most populous state in the nation with a total population of more than 11.5 million people. The state’s population accounts for 3.7 percent of the nation’s 316 million population. Since 2000, Ohio’s population increased by 1.9 percent and current projections indicate that the state’s population will remain level through 2040. The state’s total projected population in 2040 is estimated at 11.7 million, a .93% increase compared to 2013.

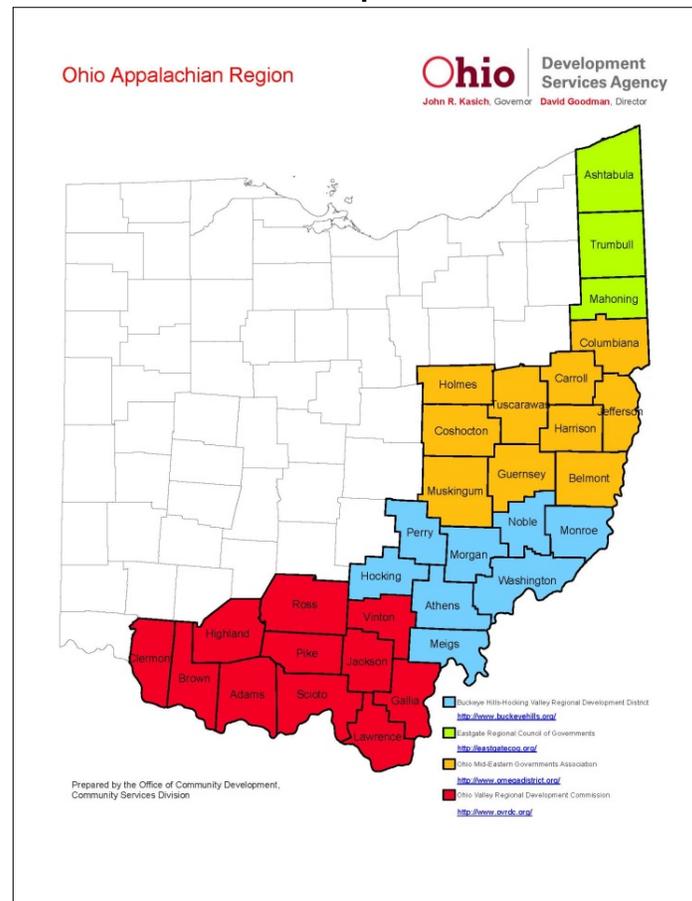
The median age in Ohio is 39.3 years compared to 37.4 years nationally. Since 2000, Ohio’s median age increased by 3.1 years. Although the nation as a whole is aging, Ohio is aging at a faster rate. Of Ohio’s total population, 15 percent is aged 65 years or older. In 2040, an estimated 19.9 percent of the state’s population will be aged 65 or older.

Nearly 80 percent of the state’s population lives in one of the state’s 14 metropolitan areas. More than 31 percent reside in four northeast areas: Cleveland, Akron, Youngstown and Canton. Central Ohio, which includes the Columbus metropolitan area, is home to 17 percent of the population and 22 percent live in three southwest metropolitan areas: Cincinnati, Dayton and Springfield (Map 1 and Map 2).

Map 1



Map 3

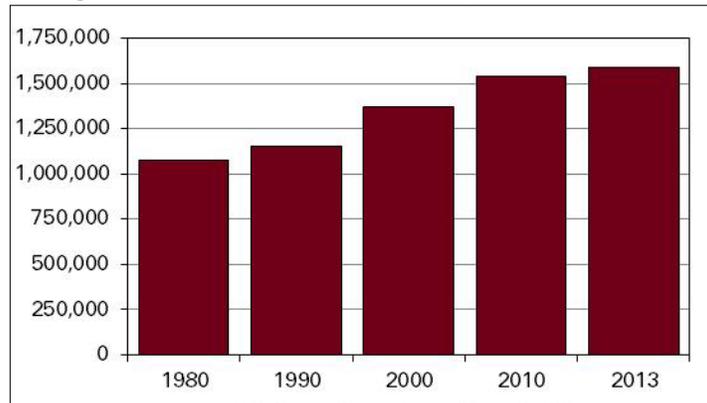


Race and Ethnicity

Under federal fair housing laws, race, national origin and color are protected classes and Ohio also includes ancestry as a protected class in state law. Nationally, minorities comprise 37 percent of the population. In Ohio, minorities make up 19 percent of the total population. Ohio's total minority population increased 20 percent since 2000 and the number of immigrants in Ohio increased 33 percent, while the white, non-Hispanic population decreased 2 percent during the same time. In Ohio's Appalachian region, minorities comprise 7.1 percent of the total population.

For the United States taken as a whole, the African American population is more than 43.6 million, accounting for 13.8 percent of the nation's total population. Since 2000, the African American community in the U.S. has experienced an increase of more than 7.2 million persons, or 19.8 percent. Ohio's African American community is comprised of nearly 1.6 million people, accounting for 13.7 percent of the state's total population (Figure 1). Ohio's African American population in relation to the state's total population is 6.1 percent below the national average. In 1980 there were more than 1 million African Americans, comprising 10 percent of Ohio's total population. According to the 2013 American Community Survey, Ohio's African American population has increased by 15.9 percent since 2000. In Ohio's Appalachian region, African Americans represent 4.4 percent of the population.

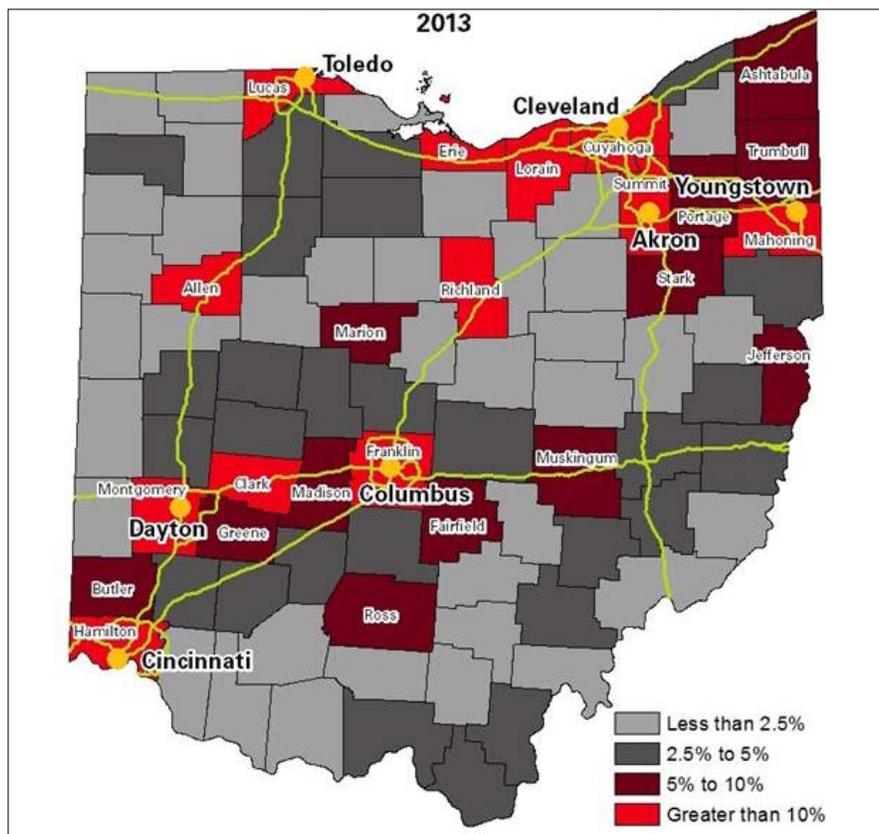
Figure 1: African American Population in Ohio



Source: 2009-2013 American Community Survey

The majority of African Americans in Ohio live in urban areas. Four out of every 10 African Americans in the state live in the cities of Cincinnati, Cleveland, or Columbus. In Columbus there are 247,000 African American residents; 211,000 in Cleveland; and 130,000 in Cincinnati. The Cleveland metropolitan area alone is home to more than 25 percent of Ohio's African American population.

Map 4: 2013 African American Population by County in Ohio



Source: 2009-2013 American Community Survey

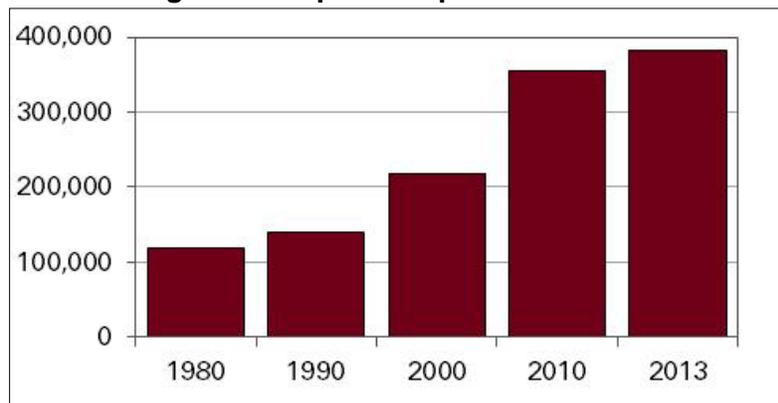
Total African American Population		Percent of County Population	
Cuyahoga	398,314	Cuyahoga	31.5%
Franklin	289,897	Hamilton	27.5%
Hamilton	221,160	Franklin	23.9%
Montgomery	120,746	Montgomery	22.5%
Lucas	93,853	Lucas	21.5%
Summit	87,234	Mahoning	17.2%
Mahoning	40,318	Summit	16.1%
Stark	35,071	Allen	14.3%
Butler	34,281	Clark	10.8%
Lorain	32,127	Erie	10.6%
Trumbull	19,927	Lorain	10.6%
Allen	15,093	Richland	10.4%

Source: 2009-2013 American Community Survey

More than 450,000 individuals in Ohio were born in other countries. There are more than 63,000 foreign-born African Americans living in Ohio. This constitutes 13 percent of all foreign-born residents, but the number is growing. Roughly 75 percent of foreign-born African Americans emigrated from Africa. Close to half of the African migration came from eastern Africa with a majority of the remainder coming from western Africa. Of foreign-born African Americans, more than two-thirds report speaking only English or English “very well”.

For the United States, taken as a whole, the Hispanic population is nearly 54million, or 17.1 percent of the nation’s total population. Since 2000, the number of Hispanics within the U.S. has increased by more than 18 million, or 53 percent. Ohio’s Hispanic community is comprised of more than 383,000 people, accounting for 3.3 percent of the state’s total population. In 1980 there were less than 120,000 Hispanics in Ohio, making up 1.1 percent of the state’s total population. According to American Community Survey data, Ohio’s Hispanic population grew by 76 percent since 2000 and more than tripled since 1980.

Figure 2: Hispanic Population in Ohio

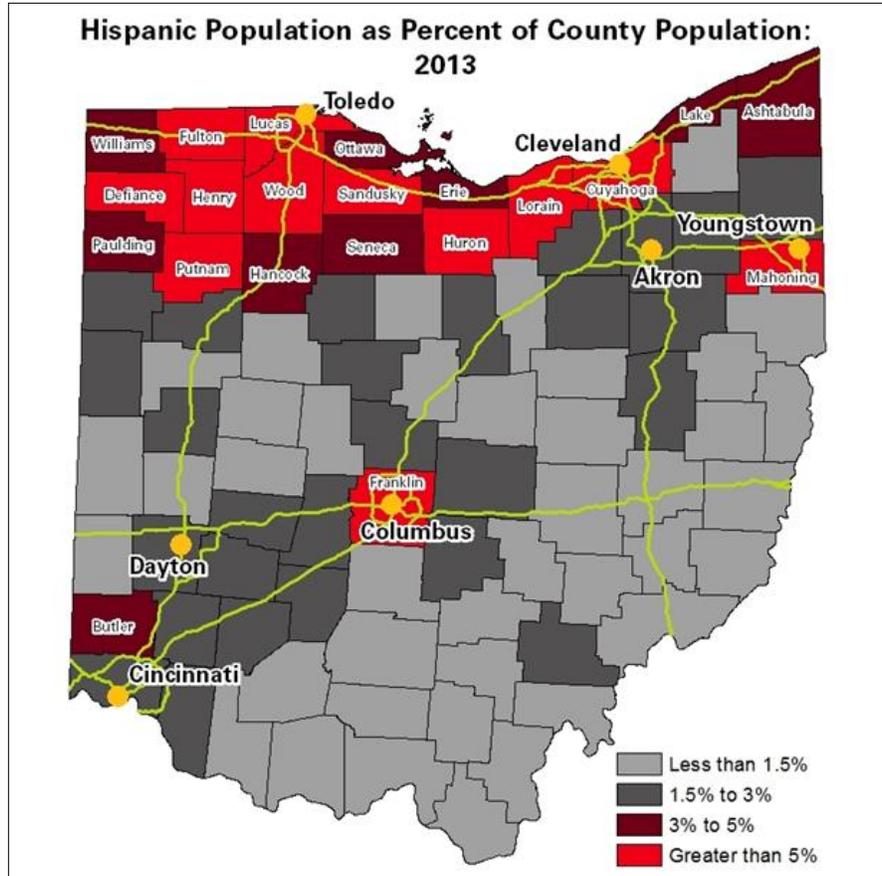


Source: 2009-2013 American Community Survey

The majority of Hispanic Ohioans live in urban areas of the state. Three out of every 10 Hispanic Ohioans live in one of four cities: Cleveland, Columbus, Lorain and Toledo. In Columbus there are 50,000 Hispanic residents, in Cleveland there are 42,000, in Toledo there

are 22,000 and in Lorain, 16,000. The Hispanic population makes up a higher proportion of county populations in the north and northwest sections of Ohio, many of which are rural. In Ohio's Appalachian region, Hispanics represent 1.6 percent of the region's population.

Map 5



Source: 2009-2013 American Community Survey

Total Hispanic Population		Percent of County Population	
Cuyahoga	65,784	Defiance	9.6%
Franklin	60,815	Sandusky	9.5%
Lucas	28,581	Lorain	8.9%
Lorain	26,955	Fulton	8.2%
Hamilton	22,619	Henry	7.3%
Butler	15,904	Lucas	6.5%
Montgomery	13,549	Huron	5.9%
Mahoning	12,022	Putnam	5.8%
Summit	10,006	Cuyahoga	5.2%
Lake	8,801	Mahoning	5.1%
Stark	6,838	Wood	5.1%
Wood	6,605	Franklin	5.0%

Source: 2009-2013 American Community Survey

Much of the recent increase in Ohio's Hispanic population has occurred in the Mexican community, and it has more than doubled since 2000. The number of Hispanic Ohioans with an ancestral link to Mexico is more than 192,000; nearly 75 percent of these residents were born in the United States. Recent immigration from Mexico is an important factor in the growth in Ohio's Hispanic community with more than 31,000 people arriving from Mexico since 2000.

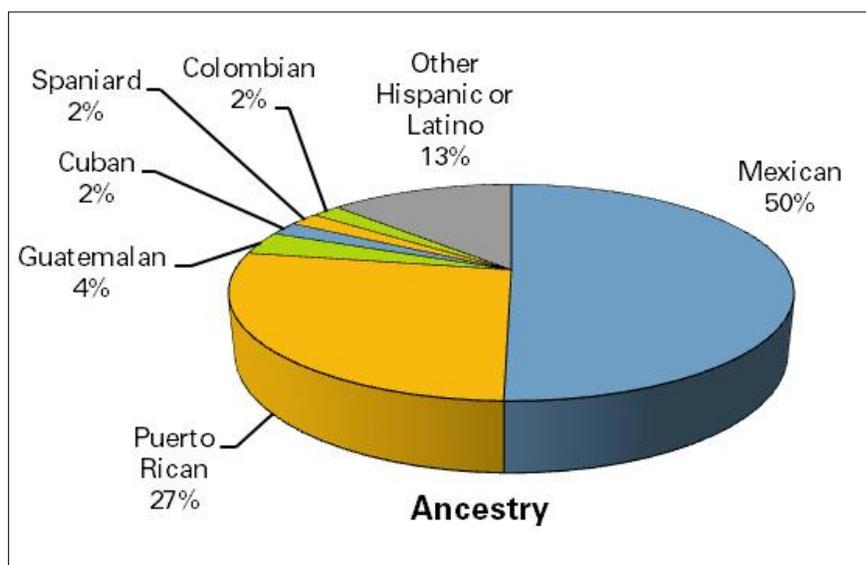
While the number of Ohio residents with Puerto Rican heritage has grown in recent decades, its portion of the Hispanic community is slowly declining, consisting of slightly more than 25 percent of Ohio's Hispanic population.

While Ohio residents with Mexican and Puerto Rican heritage make up a majority of Ohio's Hispanic community, Central America is becoming a more common point of origin. Hispanic Ohioans with ancestors in Central America have quadrupled since 2000, with a large portion having ties to Guatemala or El Salvador. Around two-thirds of Guatemalans and Salvadorans in Ohio are immigrants.

A little more than 20 percent, or roughly 84,000, of Hispanic Ohioans are foreign born; more than 50,000 of these residents arrived in the past decade or so. A larger proportion of immigrants from Latin America are young adult men. This is especially true for Mexico and Central America where roughly two-thirds of migrants are between the ages of 18 and 44 and, in Mexico's case, more than 60 percent male. Since coming to the United States, slightly less than 25 percent of foreign-born Hispanics have become naturalized citizens. The figure for Mexican migrants is slightly less at around 15 percent.

Of the Hispanic population, 75 percent speak only English or report speaking English "very well". Just more than half of the Hispanic population reports speaking Spanish at home.

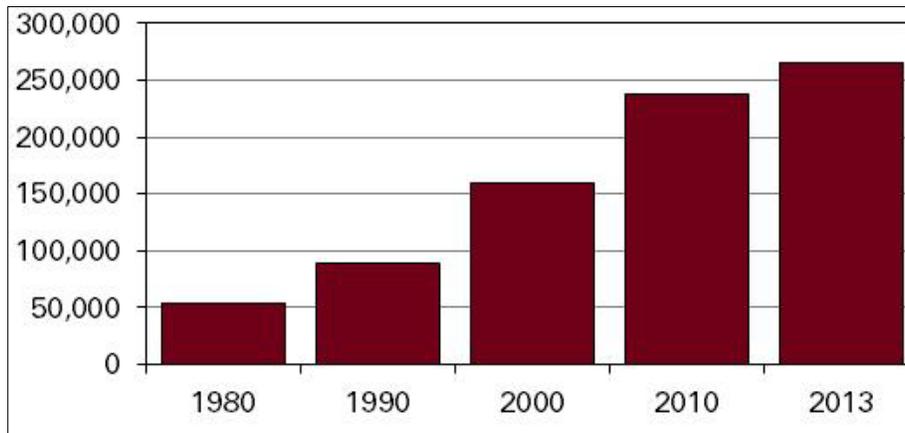
Figure 3: Hispanic Ancestry in Ohio



Source: 2009-2013 American Community Survey

As a whole, the Asian population is nearly 18.9 million, or 6.0 percent of the nation’s total population. Since 2000, the number of Asian Americans in the U.S. has increased by more than 7 million people, or 59 percent. Ohio’s Asian American community is comprised of more than 265,000 people, accounting for 2.3 percent of the state’s total population. In 1980 there were approximately 50,000 Asians in Ohio, comprising 0.5 percent of the state’s total population. Ohio’s Asian population grew by 66 percent since 2000 and more than quadrupled since 1980.

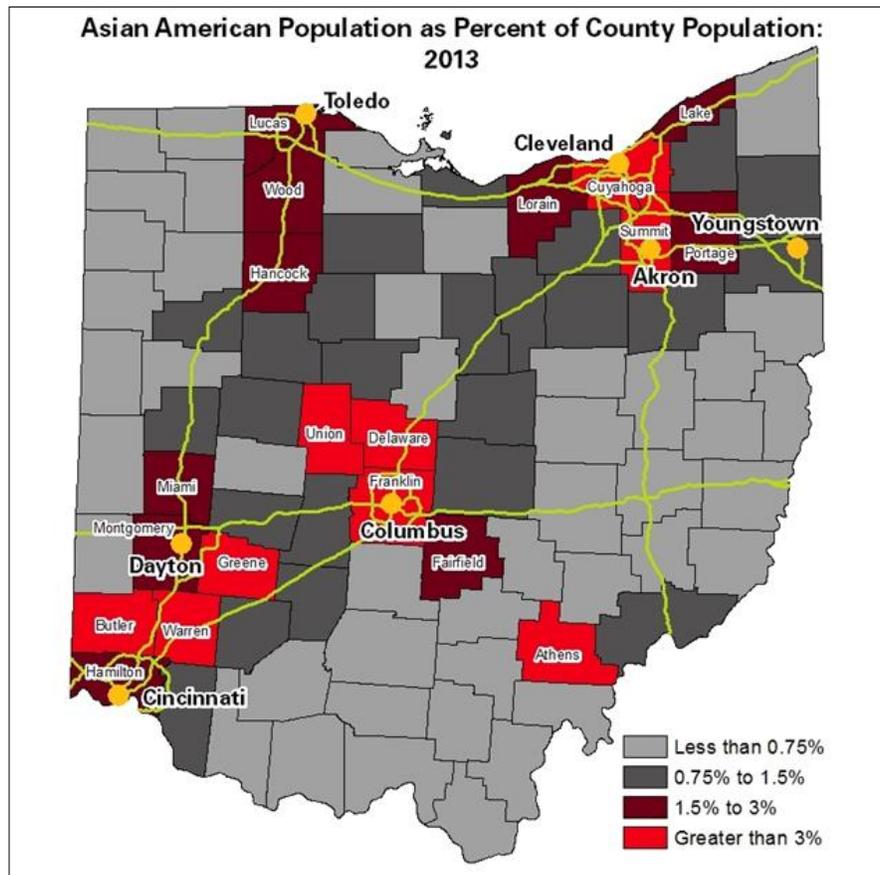
Figure 4: Asian Population in Ohio



Source: 2009-2013 American Community Survey

A majority of Asian American Ohioans live in the state’s metropolitan areas. Generally, Asian Americans in Ohio are as likely to live in the suburbs as the central city. The city of Columbus is an exception with more Asian Americans living in the city because of the influence of The Ohio State University. More than 44,500, or 17 percent, of Ohio’s Asian population live in Columbus. There are another 35,000 Asian American Ohioans living in the Columbus metropolitan area. The Cleveland-Akron metropolitan area has more than 73,000 Asian Americans residents. In Ohio’s Appalachian region, Asians represent .5 percent of the region’s population.

Map 6



Source: 2009-2013 American Community Survey

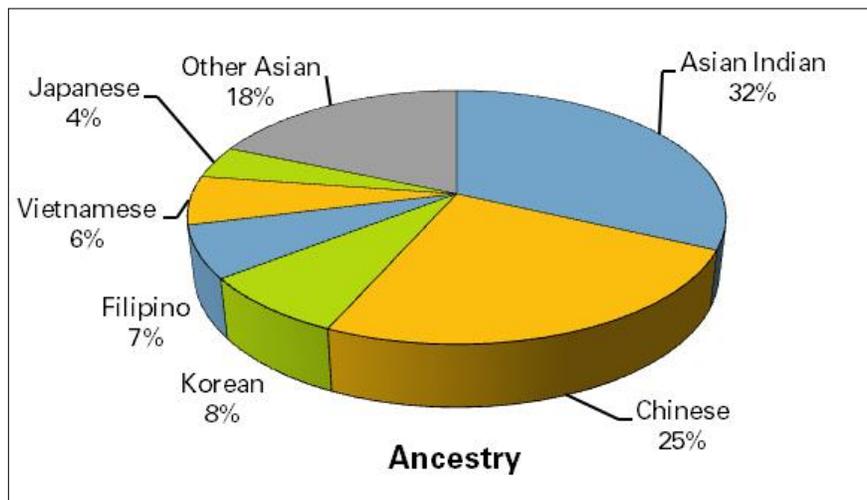
Total Asian American Population		Percent of County Population	
Franklin	60,991	Delaware	5.7%
Cuyahoga	42,589	Warren	5.1%
Hamilton	22,195	Franklin	5.0%
Summit	16,593	Greene	3.8%
Montgomery	13,526	Athens	3.8%
Butler	11,872	Cuyahoga	3.4%
Warren	11,086	Union	3.3%
Delaware	10,561	Butler	3.2%
Lucas	9,520	Summit	3.1%
Greene	6,249	Hamilton	2.8%
Lorain	4,642	Montgomery	2.5%
Stark	4,327	Lucas	2.2%

Source: 2009-2013 American Community Survey

Nearly 40 percent of Ohio's foreign-born population is from Asia. More than 74,000 of the nearly 266,000 Asian Americans in Ohio are of Indian descent. The Indian community is growing

quickly and has expanded by 80 percent since 2000. Roughly 25 percent of foreign-born Indians emigrated from India since 2000. Chinese American, the second largest group behind Indian, accounts for 25 percent of Asians in Ohio. The Chinese community is growing quickly, doubling or increasing around 32,000 people, since 2000. Around two-thirds of this growth is due to international migration. The Ohio Vietnamese community, while smaller, is experiencing significant growth. Since 2000 it has grown by more than 50 percent to around 18,000 people. The Filipino and Korean populations are also growing, but at a slightly slower pace. The size of the Japanese community has not changed significantly since 2000. Roughly 75 percent of Asian American Ohioans speak a language other than English at home. How proficient they are at English depends, to some extent, on their or their family’s country of origin. About 90 percent of the foreign-born Asian population in Ohio with ties to south central Asia, mainly India, speaks a language other than English at home. Of these, around 75 percent report speaking English “very well”. About 50 percent of Asian Americans that speak Chinese, Korean, or Japanese at home report speaking English “very well.” Less than 25 percent from these three groups reports speaking English at home.

Figure 5: Asian Ancestry in Ohio



Source: 2009-2013 American Community Survey

Household Characteristics

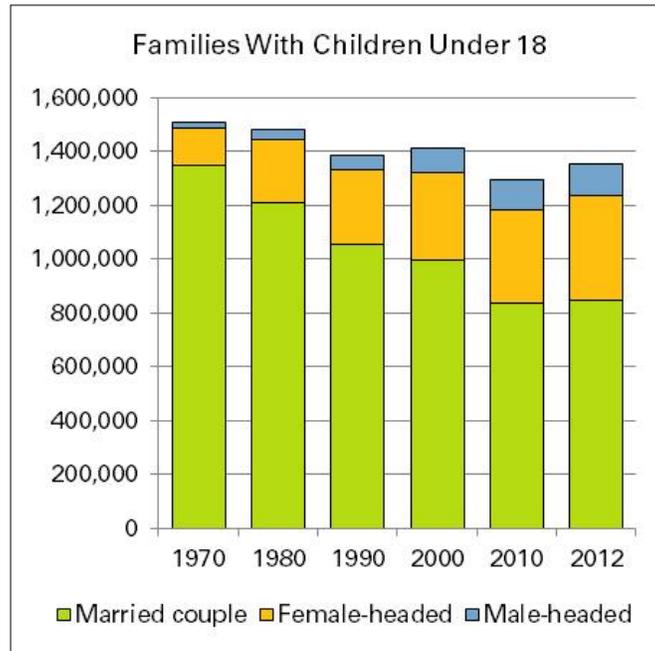
Familial status and disability are protected classes in federal fair housing laws. In Ohio, the average household size is 2.47 individuals, down from 3.43 in 1950. Of all households in the state, 30 percent consist of one individual living alone.

Nationally, more than 32 percent of families have children. Less than 30 percent of Ohio’s households consist of families with children. Married-couple families with children living at home comprise 28.5 percent of all families. There are nearly 3 million families in Ohio, of which 43.6 percent have children living at home younger than age 18. Of all married-couple families:

- 119,200 marriages include at least one African American spouse
 - 43 percent with children living at home
- nearly 39,000 marriages include at least one Hispanic spouse
 - 62 percent with children living at home
- nearly 41,500 marriages include at least one Asian American spouse
 - 57 percent with children living at home

Single-female and single-male households without a spouse that have children younger than 18 years living at home represent 11.7 and 3.4 percent of families, respectively. Of the total single-mother households, African-American mothers comprise 64 percent; Hispanic-American mothers 40 percent and Asian-American mothers 10 percent.

Figure 6: Families with Children Under 18 in Ohio



Source: 2013 5-Year American Community Survey for Ohio U.S. Bureau of Census

Under both federal and state law, disability is a protected class. According to ACS data, 13.3 percent, 1.5 million individuals, identify as having some form of disability in the state. Ohio’s Appalachian region has a slightly higher percentage of disabled individuals than the rest of the state at 16.5 percent. In Ohio’s Appalachian region, five counties have a disability rate of 20 percent or more: Scioto (21.2), Lawrence (21.1), Pike (20.7), Adams (20.4) and Meigs (20.2) (Map 7). Ohioans 65 years and older comprise 35.9 percent of the state’s disabled population, as illustrated in Table 6. Disabled older adults with ambulatory difficulty comprise 23 percent of the disabled older adult population. There are than 252,000 individuals with a hearing impairment and more than 245,000 with a vision impairment living in Ohio.

For people with severe and persistent mental illness or substance use disorders, people with developmental disabilities, and older adults with cognitive and physical health limitations, access to stable, affordable housing is one of the main factors that allows these populations to remain living in the community, avoiding long-term institutional care. Housing for these disabled populations require a variety of support services.¹

¹ Ohio Governor’s Office of Health Transformation

Total Population with a Disability	1,515,538	13.3%
Under 5 Years Old	5,501	0.8%
<i>hearing difficulty</i>	3,595	0.5%
<i>vision difficulty</i>	2,963	0.4%
5-17 years old	124,174	6.3%
<i>hearing difficulty</i>	13,803	0.7%
<i>vision difficulty</i>	15,627	0.8%
<i>cognitive difficulty</i>	97,956	4.9%
<i>ambulatory difficulty</i>	13,474	0.7%
<i>self-care difficulty</i>	19,155	1.0%
18-64 years old	811,763	11.5%
<i>hearing difficulty</i>	156,926	2.2%
<i>vision difficulty</i>	126,845	1.8%
<i>cognitive difficulty</i>	354,862	5.0%
<i>ambulatory difficulty</i>	421,255	5.9%
<i>self-care difficulty</i>	144,298	2.0%
<i>independent living difficulty</i>	290,970	4.1%
65 years and older	574,100	35.9%
<i>hearing difficulty</i>	235,263	14.7%
<i>vision difficulty</i>	99,496	6.2%
<i>cognitive difficulty</i>	135,984	8.5%
<i>ambulatory difficulty</i>	367,054	23.0%
<i>self-care difficulty</i>	127,857	8.0%
<i>independent living difficulty</i>	247,728	15.5%

Source: 2013 5-Year American Community Survey for Ohio
U.S. Bureau of Census

Income and Poverty

Income

The 2013 per capita personal income for Ohio was \$40,865 (30th nationally). This was an increase of 2.0 percent from the previous year according to the U.S. Bureau of Economic Analysis. Since 1969, per capita personal income has had annual increases as high as 10.7 percent which occurred during the 1970s and as low as -2.4 percent in 2009. In 2013, Ohio's per capita personal income was 91.7 percent of the nation's per capita income.

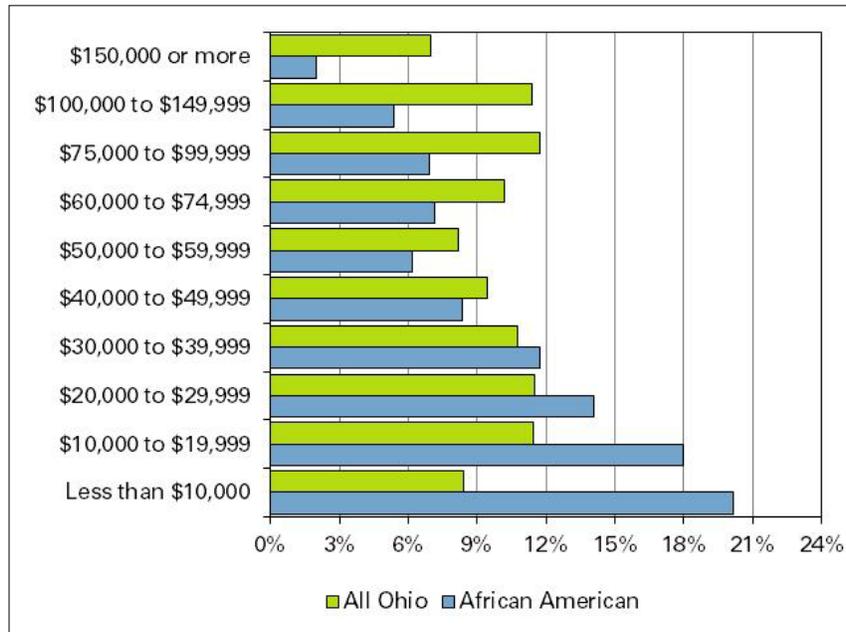
Figure 7: Per Capita Personal Income; Selected Years

	1970	1980	1990	2000	2007	2008	2009	2010	2011	2012	2013
U.S.	\$4,196	\$10,150	\$19,584	\$30,587	\$39,804	\$40,873	\$39,357	\$40,163	\$42,298	\$43,735	\$44,543
Ohio	\$4,136	\$9,907	\$18,663	\$28,620	\$35,594	\$36,386	\$35,511	\$36,274	\$38,657	\$40,057	\$40,865

Source: 2009-2013 American Community Survey

The income of African American Ohioans tends to be lower than that of Ohioans taken as a whole, at approximately \$28,000. A lack of full-time, year-round employment is one factor accounting for the lower income.

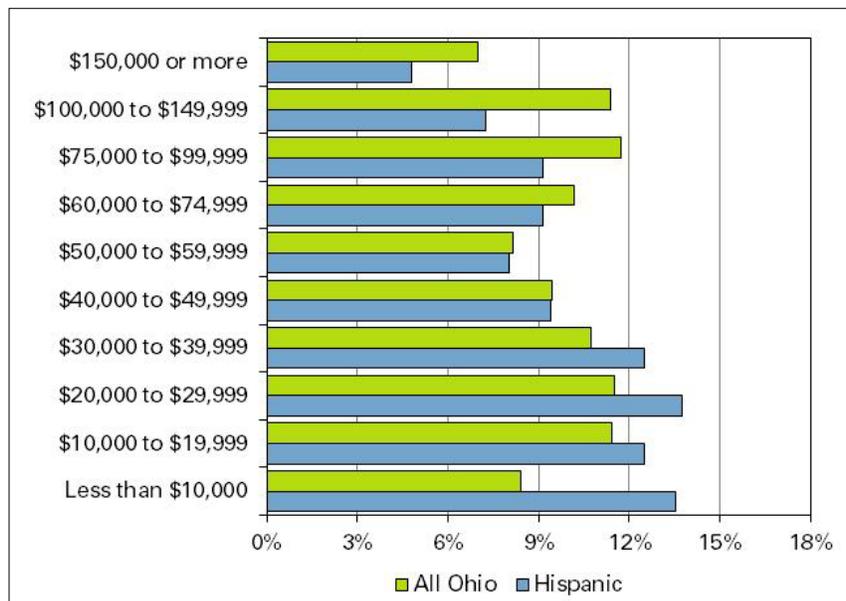
Figure 8: African American Household Income Distribution in Ohio



Source: 2009-2013 American Community Survey

As a whole, the median income of Hispanic Ohioans is lower than the state median income. The median household income for Hispanics is slightly more than \$38,100. This figure is influenced by the latest immigrants to Ohio. The median household income for immigrants, of which Mexicans comprise the majority of recent arrivals, is near \$35,900. Immigrants from other Central America countries tend to have a higher income with a median income of \$38,100.

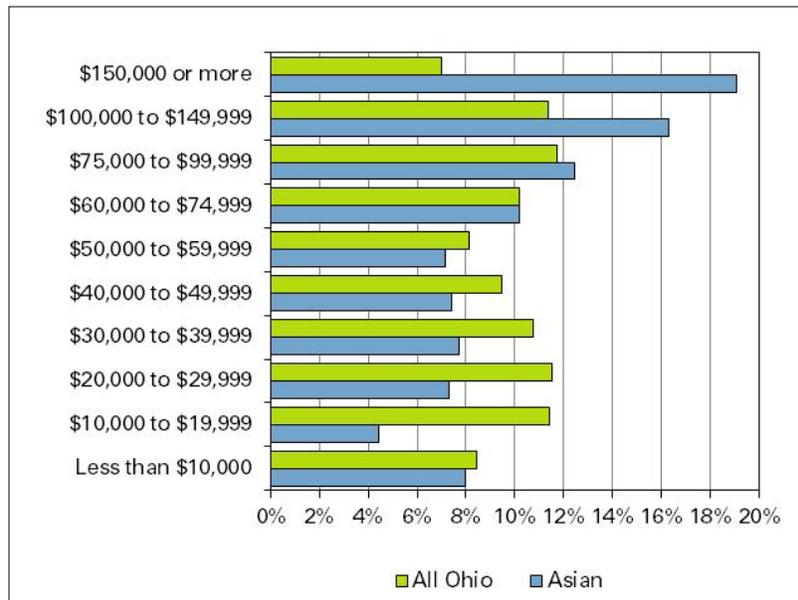
Figure 9: Hispanic Household Income Distribution in Ohio



Source: 2009-2013 American Community Survey

The income of Asian Americans in the state tends to be higher than that of Ohioans taken as a whole. The median household income for Asian Americans living in Ohio is more than \$71,200. The income of foreign-born persons from Asia was slightly lower than that of Ohio's Asian population taken as a whole.

Figure 10: Asian Household Income Distribution in Ohio



Source: 2009-2013 American Community Survey

Poverty

Since 2005, Ohio's poverty rates have been nearly equal to or slightly higher than national averages. The latest data shows that an estimated 1.8 million people in Ohio were poor, 16.0 percent of all persons for whom poverty status was determined. Nearly 340,000, or 11.6 percent, of Ohio families were poor in 2013 (Appendix 4).

Of Ohio's 88 counties, 79 counties and most of the state's larger cities had significantly higher poverty rates from 2009 to 2013 than they had in 1999. In Ohio, 17.2 percent of the people in urban places (densely populated areas of 2,500 or more) were poor, and 27.8 percent of those living in the central or principal cities of metropolitan areas were poor in 2013. By contrast, 11.0 percent of those in rural areas (farms and smaller places) were poor, while 11.0 percent of metropolitan area residents outside of the principal and central cities were poor. In Ohio's Appalachian region, 17.6 percent of the population was poor; the poverty rate for the rest of Ohio averaged 15.4 percent (Appendix 5).

The counties with the lowest poverty rates were Delaware, Warren, Putnam, Medina and Union, ranging from 4.9 to 7.8 percent. All five counties border or are part of metropolitan areas. The counties with the highest poverty rates were all in Appalachia: Athens, Jackson, Pike, Scioto and Adams and ranged from 22.7 to 31.7 percent (Map 8).

Poverty rates for families and individuals in Ohio during 2012-2013 vary by circumstances and characteristics. Married couples with a full-time, year-round worker had poverty rates less than 2 percent compared with poverty rates of 10 percent or more among couples lacking a full-time, year-round worker. Other families with a full-time, year-round head had poverty rates between

4 and 13 percent, while those without a full-time, year-round worker had poverty rates greater than 30 percent.

Families with related children had poverty rates ranging from 7.3 percent among married couples to 55.3 percent for those headed by a female single-parent. The corresponding poverty rates for families without children ranged from 3.1 percent to 11.7 percent, the same as male single-parent families. Slightly more than 23 percent of poor families received cash public assistance, compared with just 5.9 percent of those not in poverty; however, such payments seldom boost families out of poverty. Adults with at least a bachelor's degree account for 4.2 percent of Ohio's poor population, while 29.6 percent of those who did not graduate from high school were poor. High school graduates and those with some college or an associate's degree had poverty rates between 4.2 and 29.6 percent.

By age, children birth to age 11 and young adults 18 to 24 had poverty rates that exceeded 20 percent. Conversely, while less than 10 percent of people ages 65 and older were poor, up to 63 percent of that population would have been poor without Social Security and pension incomes.

Minorities tend to have higher rates of poverty compared to whites. Thirty-four percent of African Americans in Ohio live below the poverty line. Of Ohio's 316,900 African American family households, 29 percent live below the poverty line. Around 41 percent these households have children younger than 5 years of age. Thirty-seven percent of African American households received food stamps within the last 12 months. Twenty-seven percent of Hispanic Ohioans live below the poverty line. Of Ohio's 73,000 Hispanic family households, 25 percent live in poverty, of which 56 percent have children younger than 5 years of age. More than 26 percent of Hispanic households received food stamps within the last 12 months. Of Ohio's Asian American population, 11 percent live below the poverty line. Of Ohio's nearly 47,700 Asian American family households, 7 percent are in poverty, and around two-thirds have related children at home. Approximately 6 percent of Asian Americans households received food stamps within the last 12 months.

Employment

Ohio's manufacturing sector employs 682,600 people. The state's factories lead the nation in plastics and rubber, fabricated metals, and electrical equipment and appliance production. Ohio also is a leading producer of steel, autos, and trucks. Skilled manufacturing workforce, healthcare hubs, relatively low business costs, and increasing diversification in the metropolitan areas are areas of economic strength.

The state's private sector is comprised of 730,393 self-employed firms and 190,184 employer firms. Small businesses employing one or more workers account for 20 percent of all firms and employ 48 percent of the workforce. Self-employed or non-employer firms comprise 78 percent of all businesses. Table 6 lists the state's major employers. A full list can be found in Appendix 6 at the end of this document.

Company	Sector
Cardinal Health	Trade
Ford Motor	Manufacturing
General Electric	Manufacturing
General Motors	Manufacturing
Goodyear Tire & Rubber	Manufacturing
Honda Motor Company	Manufacturing
JP Morgan Chase	Financial
Kroger	Trade
Macy's	Trade
Nationwide Mutual Insurance	Insurance
Proctor & Gamble	Manufacturing
Wal-Mart Stores	Trade
Whirlpool	Manufacturing

Source: Ohio Development Services Agency

There are more than 52,100 African American-owned businesses in Ohio. Of that number, there are more than 2,800 businesses with a payroll and, combined, employ nearly 33,300 workers with an annual payroll of more than \$807 million. Hispanic Americans own more than 9,700 businesses in Ohio, of which there are 1,340 Hispanic businesses with a payroll and, combined, employ more than 11,600 workers with an annual payroll of more than \$375 million. Asian Americans own more than 18,000 businesses in Ohio. Of that number, businesses with a payroll total more than 6,000 and, combined, employ more than 51,000 workers with an annual payroll of nearly \$1.4 billion.

Ohio's civilian labor force totaled more than 5.7 million in 2013, with more than 5.3 million individuals employed. The national unemployment rate for February 2015 was 5.5 percent. Ohio's unemployment rate was 5.1 percent in February 2015 compared to 6.2 percent a year earlier. Total employment in Ohio is expected to increase 9.3 percent from 2010 to 2020, a projected gain of 498,100 jobs (Map 9).

The number of African American Ohioans in the civilian labor force is more than 651,000; the unemployment rate for African American Ohioans is 16.7 percent. African Americans in the labor force between the ages of 16 and 24 have an unemployment rate of 29 percent. For Ohio, as a whole, the same age group has a 17 percent unemployment rate. Employed African Americans are heavily represented in service and sales/office occupations. Of the more than 542,000 employed African Americans in Ohio, 28 percent are in service occupations with 44,300 in healthcare support. By comparison, 18 percent of all Ohioans are in service occupations. Sales and office occupations account for 26 percent with 89,000 African American Ohioans involved in office and administrative support occupations.

There are more than 172,000 Hispanic Ohioans in the civilian labor force. Hispanic Ohioans have an unemployment rate of 10.1 percent. Hispanics between the ages of 25 and 54 have an unemployment rate of 7.8 percent, only slightly higher than the 7.1 percent unemployment rate for the same age group of all Ohioans. The Hispanic immigrant community has a lower unemployment rate than the Ohio Hispanic community as a whole. Employed Hispanics are

heavily represented proportionally in service occupations, especially food service, compared to the state as a whole. Of the nearly 155,000 employed Hispanic Ohioans, more than 19,000, 12percent, are in food service occupations. For all Ohio workers, only 6 percent are in food service. Construction and building/grounds maintenance occupations also have higher concentrations of Hispanic workers than the workforce as a whole.

Based on 2013 American Community Survey data, the number of Asian American Ohioans in the civilian labor force is greater than 111,400 and accounts for 1.9 percent of the civilian labor force. Asian Americans in Ohio have an unemployment rate of 4.8 percent; Ohioans as a whole have an unemployment rate of 8.1 percent. Employed Asian Americans are highly represented in professional occupations, compared to Ohioans as a whole. Of the roughly 106,000 employed Asian Americans, nearly 42 percent are in occupations of computer/engineering/science (18 percent), education/legal (12 percent), and healthcare (12 percent). There is also a significant number in management occupations.

Housing in Ohio

Ohio has more than 5.1 million total housing units, with an 11.1 percent vacancy rate. In the Appalachian region, the vacancy rate is 12.1 percent. More than 3 million individuals, 68 percent, in the state own their own home and more than 1.4 million, 32 percent, rent housing. Nearly 73 percent of the population owns their own home in Ohio’s Appalachian region, while 27.2 percent rent housing.

According to HUD, the median year homes were built in the nation was 1977. The median year housing units were built in Ohio is 1966 and 1957 in the Appalachian region, 11 and 20 years before the national median year, respectively. Most of Ohio’s homes, roughly 70 percent, were built by 1979 (Appendix 8). Due to age, maintaining older housing can cause financial strain on the homeowner. Homes built after 1979 comprise 30.6 percent of the state’s housing stock.

Year Built	Estimate	Percentage
2010 or later	8,633	0.2%
2000-2009	49,3085	9.6%
1990-1999	602,189	11.8%
1980-1989	460,399	9.0%
1970-1979	732,227	14.3%
1960-1969	635,817	12.4%
1950-1959	750,184	14.6%
1940-1949	349,599	6.8%
1939 or earlier	1,092,370	21.3%

Source: 2009-2013 American Community Survey

The median gross rent per month in Ohio is \$710 and \$610 in the Appalachian region. Table 8 illustrates the median gross rent for housing units in the state. Renters in the state on average allocate 30.2 percent of their household income to housing. Program Year 2015 Community Housing Impact and Preservation (CHIP) Program Distress Data, sourced from ACS data, shows that in two non-entitlement cities, Kent and Athens, renters pay more than 30 percent of

their household income for housing costs. This correlation can be explained because both cities are home to two universities, Kent State University’s main campus in Kent and Ohio University in Athens. Rental housing surrounding colleges and universities tend to be higher than those in other areas.

<i>Amount</i>	<i>Number</i>	<i>Percent</i>
Less than \$100	2,054	0.9%
\$100 to \$199	6,096	2.8%
\$200 to \$299	11,236	5.2%
\$300 to \$399	13,655	6.3%
\$400 to \$499	25,405	11.7%
\$500 to \$599	35,263	16.3%
\$600 to \$699	31,820	14.7%
\$700 to \$799	24,139	11.2%
\$800 to \$899	17,099	7.9%
\$900 to \$999	10,007	4.6%
\$1,000 to \$1,499	14,045	6.5%
\$1,500 or more	2,713	1.3%
No cash rent	22,946	10.6%

Source: 2013 5-Year American Community Survey for Ohio
U.S. Bureau of Census

The National Low Income Housing Coalition’s (NLIHC) *Out of Reach 2014* report states that a household would need an annual income of \$28,796 to afford a two-bedroom unit at Ohio’s average fair market rent (FMR) of \$720. For non-metropolitan areas, FMR for a two-bedroom unit averages \$634. An individual making minimum wage would have to work 70 hours per week to rent a two-bedroom unit at FMR. Renters who make the mean wage of \$11.56 per hour would have to work 48 hours per week.

Out of Ohio’s 88 counties, 28 have FMR that exceeds \$634 a month for a two-bedroom unit, with 19 exceeding \$720 per month. Below are the 41 counties with average FMR of \$634 or lower per month for a two-bedroom unit.

- | | | | | | |
|------------|----------|----------|-----------|----------|------------|
| Adams | Crawford | Harrison | Jefferson | Paulding | Seneca |
| Ashland | Darke | Henry | Logan | Perry | Van Wert |
| Ashtabula | Defiance | Highland | Meigs | Pike | Vinton |
| Belmont | Gallia | Hocking | Mercer | Putnam | Washington |
| Champaign | Guernsey | Holmes | Monroe | Richland | Williams |
| Columbiana | Hancock | Huron | Morgan | Sandusky | Wyandot |
| Coshocton | Hardin | Jackson | Noble | Scioto | |

The median home value in Ohio is \$133,700 compared to the national median value of \$176,700. The median monthly homeowners’ cost in the state is \$1,303. The monthly costs calculation includes mortgage, real estate taxes, various insurances, utilities, fuels, mobile home costs, and condominium fees. On average, owners’ costs comprise 22.9 percent of a household’s monthly income.

Households without a mortgage generally pay a lower percentage of their household income toward housing. Overall, 73.1 percent of households without a mortgage spend less than 20 percent of their monthly income for housing. However, 41.5 percent of the state's households with a mortgage spend less than 20 percent of their monthly income for housing.(Appendix 10).

Property taxes can also deter individuals from owning a home or preventing foreclosure. The Ohio Department of Taxation's homestead exemption allows low-income older adults and permanently and totally disabled individuals to reduce their tax bills by shielding some of the market value of their homes from taxation. The exemption allows qualifying homeowners to exempt up to \$25,000 of the market value (\$8,750 in taxable value) of their homes from all local property taxes in the form of a credit on property tax bills. According to the Ohio Department of Taxation's 2014 Annual Report, 886,975 individuals qualified for the exemption in 2012 with tax savings totaling approximately \$426.9 million statewide, an average of \$481 per qualified homeowner. Any Ohio resident homeowner may qualify for the exemption if they meet the following criteria:

- Not currently receiving homestead or did not qualify in the previous tax year;
- Qualifies under the means-test;
- Is at least 65 years of age or turns 65 in the year applying for the exemption;
- Is determined permanently and totally disabled as of January 1 of the application year by a licensed physician or psychologist or a state or federal agency; or
- Is the surviving spouse of a person who received the previous homestead exemption at the time of death and the surviving spouse was at least 59 years old on the date of the death.

The development of Marcellus and Utica shale formations in eastern Ohio has had an impact on the affordable housing market in the region. The Ohio Housing Finance Agency (OHFA) in partnership with the Ohio Development Services Agency (ODSA) contracted with The Ohio State University, Ohio University, the Coalition on Homelessness and Housing in Ohio (COHHIO), and Vogt Santer Insights to examine how shale oil development impacted housing markets in Belmont, Carroll, Columbiana, Guernsey, Harrison, Jefferson, Monroe and Noble counties, which are all non-entitlement counties.

According to the report, research participants in all the counties surveyed estimated that rents doubled for one-, two- and three-bedroom units. In Monroe, Guernsey and Jefferson counties, participants estimated that rents tripled. In some areas, rent increased from \$700 to \$800 per month to \$1,000 to \$1,200 per month. Rents that were once \$400 per month are now between \$600 and \$800 monthly.

Because the demand for housing has increased, renters are having more difficulty using housing choice vouchers. In a six-month period, almost 100 families attempted to use housing vouchers before 20 were successful. Landlords are less inclined to rent through the local housing authority knowing the rental market will bear tripling the \$350 rent that the housing authority will pay. Not only are there not enough affordable housing units for low- and moderate-income individuals, organizations that assist people with disabilities, older adults, veterans and foster children are also unable to find suitable housing for their clients.

Market demand has also had a negative impact on homelessness in eastern Ohio. Individuals with income levels too high to qualify for social services have resorted to couch surfing and doubling up in available housing. Potential renters with less-than-perfect rental histories or

criminal records find it had to compete in the housing market. Landlords have become less lenient with tenants who are late paying rent, which has increased eviction rates.

Typically when rental costs exceed estimated homeownership costs, renters consider purchasing a home a more affordable housing choice. Shale development has made it difficult for first-time homebuyers to find affordable housing, particularly those looking for homes less than \$150,000. Homes that once sold for \$100,000 are now selling for \$250,000 or more since shale development began. Homes in the \$100,000 to \$150,000 range are in short supply, limiting purchasing options for low- and moderate-income households.

Section 2: Federal and State Fair Housing Laws

Ohio Civil Rights and Fair Housing History²

Early in Ohio's history, settlements in southern Ohio by people from slave states progressed faster than northern Ohio by settlers from eastern states. As a result, this set the initial tone for civil rights toward the largest minority group of the time: free Africans and escaped and free slaves. Most freed and escaped slaves settled in Ohio River and southern counties where attitudes toward these groups were not of equality. During this time, the Ohio legislature passed a series of "Black Laws" that imposed constraints on free African Americans to discourage them from settling in the state. Enacted in 1804 and 1807, these laws treated African Americans as second-class citizens. More stringent restrictions were enacted in the 1830s; however, most of these restrictions were repealed by 1850.

The Civil War created an intense period of industrialization and population growth. While a significant number of African Americans lived in Cincinnati, Columbus and other towns, most of the industrial labor force was comprised of whites migrating from Ohio's rural areas and immigrants. The post-war period brought with it greater diversity in ethnic and religious groups. Large numbers of Italians, Slovenians, Croatians, Polish, Lithuanians, Slovaks and Jewish and Eastern Orthodox religious followers came to Ohio. Southern and eastern Europeans settled mainly in Cleveland and the Mahoning Valley. Toledo included these groups along with Mesopotamian Chaldeans from Detroit. At this time, few Asians or Hispanics immigrated to Ohio. Although these groups were no more qualified for industrial work than African Americans, employers preferred to recruit immigrants.

European immigrants initially tended to concentrate in certain neighborhoods, particularly those with the least expensive housing, close to commerce or in areas where they could organize an ethnic religious parish. In Cincinnati, the Over the Rhine district was a center of German settlement and culture. In Cleveland, many Italian and Jewish immigrants settled in the Central district southeast of the main market. Despite these patterns, it was unusual for one white ethnic group to comprise more than 50 percent of a neighborhood. In Cleveland, African Americans lived in the Central district and in other neighborhoods throughout the city. Prior to World War I, housing patterns were more racially diverse in Ohio than they were following the Great Migration and Ohio's housing industry's and communities' response to the Great Migration.

Coinciding with the World War I, several factors affected change in race relations in Ohio. Woodrow Wilson, a southerner, was elected president and effectively stopped race relations at the federal level. The beginning of the war cut off immigrant labor to America at the same time demand for American products increased. Employers were forced to look at domestic labor to fill wartime needs. As a result of boll weevils ravaging southern cotton crops and an oppressive system in the south, many African Americans were receptive to recruiters. Nearly 6 million African Americans from southern states migrated north during the Great Migration from about 1916 to 1970. From 1910 to 1920, Cleveland's African American population quadrupled. By 1930, the population doubled again and comprised 8 percent of the city's population. By 1960, more than 250,000 African Americans lived in Cleveland.

²Ohio State Legal Services Association. *History of Fair Housing in Ohio*. Ohio Development Services Agency, 1999. Web. May 4, 2015.

As more African Americans migrated to Ohio, white citizens and community, social and economic institutions responded to the racial change. Economic, social and governmental institutions' racial policies and practices had more lasting and widespread consequences on civil rights, especially housing rights in Ohio. Institutionalized racial discrimination patterns, enforced by government regulation or professional associations, replaced looser, more sporadic instances of social bias in the state.

In housing, real estate companies encouraged restrictive covenants to restrict certain groups from purchasing property in many areas. Developers of an exclusive suburb in Cleveland specified no African Americans would reside in the suburb, even those professionals who could afford to live there. In another suburb, a neighborhood associated developed a restrictive covenant excluding Jews and many southern and eastern European ethnic groups. As more European ethnic groups became "Americanized", the real estate market welcomed their money; however, this did not extend to African Americans. The U.S. Supreme Court ruled restrictive covenants legally unenforceable in 1948. Despite the decision, many sellers and agents continued to follow these practices.

The federal government explicitly supported racial exclusion in its Federal Housing Administration (FHA) and Veterans' Administration (VA) mortgage loan insurance programs initially. The FHA manual mentioned the need to avoid introducing "inharmonious" racial groups into all-white neighborhoods. Public housing projects built during the Great Depression were originally racially segregated by policy, with separate projects for African Americans and whites. After World War II, when the federal government subsidized white migration to the suburbs by providing low-interest home loans and constructing superhighways, African Americans were relegated to older inner-city housing vacated by whites.

With exclusion from most neighborhoods by institutional design or individual hostility and violence, African Americans lived in neighborhoods open to them. As families doubled up or larger homes were divided into substandard efficiency apartments, population densities increased in these neighborhoods. With high demand and limited supply, rents or housing prices in these densely populated areas were higher than in nearby white areas. As a result, some real estate agents engaged in block-busting for economic reasons. These agents would target white neighborhoods adjacent to predominantly African American ones. Agents would help one African American family move into the neighborhood, then market to neighboring whites offering to buy their properties at less than the home's value. Agents would make a profit twice: selling a new home in a suburb to white homeowners and then selling the vacated home to an African-American family at a considerable markup. Lending institutions and insurers typically supported these practices by refusing loans to African Americans except in predominantly African-American neighborhoods or in "changing" neighborhoods. Conversely, white buyers were typically directed away from these areas by realty companies and lenders.

Federal efforts in the late 1940s resulted in the Housing Act of 1949 that called for decent and safe housing for all Americans. The Act authorized the federal government to award funds to communities to assist in eliminating slum and redeveloping center cities, new construction, and activities that support new construction such as neighborhood facilities, and basic water and sewer facilities. The federal government provided subsidies totaling nearly \$13 billion to communities that were then required to supply matching funds. Local governments obtained sites through eminent domain, the right of the government to take over privately owned real estate for public purposes, in exchange for "just compensation". They would then sell the cleared land to private real estate developers at below-market prices. In return for the subsidy and certain tax abatements, developers built commercial projects and housing for the upper-

middle class. The act also promoted building civic centers, office buildings, and hotels on the cleared land. In many areas, land too close to slum areas became municipal parking lots.

The Highway Act of 1956 funded interstate highways that also helped perpetuate urban sprawl. White middle-class residents moved to new suburban housing developments. The highways also divided cities physically. Clearing inner-city neighborhoods to construct the new highway system destroyed neighborhoods and displaced low-income residents. Nationally, more than 2,000 construction projects on 1,000 square miles of urban land were undertaken between 1949 and 1973, when the urban renewal program officially ended. Roughly 600,000 housing units were demolished, requiring nearly two million inhabitants to move.³

During this time, politically, African Americans were represented on city councils and school boards and a few were members of the Ohio General Assembly and judiciary system. However, there were no African American mayors of medium- to large-sized cities, statewide elected officials or Congress members. While the African American population grew, as a group, they still had limited political representation.

In 1959, the Ohio General Assembly passed legislation prohibiting employment discrimination and established the Ohio Civil Rights Commission. While the law created the Commission to enforce discrimination laws, the Commission did not always have funding. In 1965, the Ohio General Assembly passed legislation that extended discrimination protection to housing, and in 1987, passed Ohio's Fair Housing Law.

In August 1988, Congress amended the federal Fair Housing Law to substantially increase the HUD's power to seek relief for individual housing discrimination claims. Other amendments broadened the number of protected classes to include families with children and the disabled. In 1989, the federal government grandfathered the Ohio law into substantial equivalency. Ohio's substantially equivalent fair housing law was passed in June 1992.

Although Ohio's legislature passed fair housing laws, voters during the 1970s and 1980s continued to reject amending the Ohio Constitution to permit issuing mortgage revenue bonds for housing. When multi-family housing was removed from the language, voters passed the amendment in 1982. The Ohio Housing Finance Agency was created in 1993. With active participation by fair housing agencies across the state, the Ohio Housing Finance Agency adopted fair housing policies.

In 1980, HUD released a study concluding that 25 percent of all rental housing in the nation was not available to families and an additional 50 percent of the rental stock imposed significant restrictions on either the age or number of children in a family. Families with children lacked fair access to 75 percent of the nation's rental housing. As a result, families were evicted from their homes because of size. Until the federal Fair Housing Amendments Act of 1988 (FHAA) was enacted, both federal and Ohio fair housing laws primarily protected racial and ethnic minorities against housing discrimination. The FHAA was enacted with two purposes: to strengthen the administrative enforcement provisions of Title VIII and extend Title VIII protections to additional individuals by including familial status and disability.

Congress' general intent for the Fair Housing Act and the 1988 amendments was to ensure all Americans have equal access to adequate housing and an equal opportunity to obtain housing

³Curtis, Cathy. "Urban Redevelopment." *Dictionary of American History*. Ed. Stanley I. Kutler. 3rd ed. Vol. 8. New York: Charles Scribner's Sons, 2003. 285-288. *Gale Virtual Reference Library*. Web. 4 May 2015.

they choose. Since relatively few minorities live in rural Ohio, prior fair housing laws did not impact those areas as much. By amending the Fair Housing Act to prohibit familial status and disability discrimination, Congress expanded the fair housing law’s scope and made the law more relevant to individuals living in Ohio’s rural areas. Both issues in fair housing may be more pervasive in rural areas because of smaller housing supply, greater geographic distances and related mobility barriers, no or limited access to local fair housing agencies or civil rights organizations and a larger proportion of small, private owners in rural housing markets. Many low-income families with children in rural areas live in mobile home parks, which have not been enforced as aggressively as other housing types. Since the Fair Housing Act of 1988 and Ohio’s substantially equivalent legislation passed in 1992, housing discrimination charges based on familial status or disability rose considerably.

Ohio, like the nation, has a serious affordable housing shortage, which is exacerbated by housing discrimination against families with children. In 1998, the Coalition on Homelessness and Housing in Ohio, released a study that analyzed the issues renters faced in the private rental market in Ohio. The study found:

- 37 percent of all Ohio renters were unable to afford rent for a two-bedroom unit (30 percent of income for housing costs);
- Low-income renters paid more than one-third of their household income for housing costs in all of Ohio’s metropolitan areas;
- In the 39 counties analyzed, low-income renters had to pay more than one-third of their household income for a two-bedroom unit;
- In all of Ohio’s metropolitan areas and the 39 counties analyzed, renters earning minimum wage had to work between 60 and 81 hours per week to afford a two-bedroom unit; and
- In rural areas low-income renters could not afford fair market rent for a two-bedroom unit.

The Fair Housing Amendment Act had three broad purposes related to individuals with disabilities:

- To end segregated housing available to individuals with disabilities;
- To expand housing choice for individuals with disabilities; and
- To assure reasonable accommodations are made to the individual needs of people with disabilities in securing and using housing.

The disabled provisions of the FHAA provided broad protections for individuals with disabilities. However, three unique discrimination categories were included for individuals with disabilities:

- Refusing to rent or sell to individuals with disabilities or attempting to evict an individual because of a disability;
- Landlord or housing provider refuses an individual’s request for a reasonable accommodation in rules, policies, practices or services to enable an individual to acquire or enjoy a unit; and
- Landlord’s or housing provider’s failure to make certain units of newly constructed multi-family housing accessible to disabled individuals with mobility impairments.

The Ohio Civil Rights Commission experienced a large increase in the numbers of fair housing and disabled discrimination claims filed in 1999. The Commission refocused its energies, and

along with HUD, expanded community education and outreach efforts. The Ohio Development Services Agency and fair housing organizations in the state increased educational efforts on fair housing and served as clearinghouses for disseminating information to civil rights and housing advocates across Ohio. Many small cities in Ohio have established local fair housing agencies, appointed a local fair housing contact and passed local fair housing ordinances. In several rural counties, local legal aid programs received funding to perform fair housing education and outreach and investigate cases. Professional associations related to housing also conduct national, state and local fair housing trainings for their members.

Current Federal Laws and Executive Orders

Fair Housing Act

Title VIII of the Civil Rights Act of 1968 (Fair Housing Act), as amended, prohibits discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions, based on race, color, national origin, religion, sex, familial status (including children under the age of 18 living with parents or legal custodians, pregnant women, and people securing custody of children under the age of 18), and disability.

Title VI of the Civil Rights Act of 1964

Title VI prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving federal financial assistance.

Section 504 of the Rehabilitation Act of 1973

Section 504 prohibits discrimination based on disability in any program or activity receiving federal financial assistance.

Section 109 of Title I of the Housing and Community Development Act of 1974

Section 109 prohibits discrimination on the basis of race, color, national origin, sex or religion in programs and activities receiving financial assistance from HUD's Community Development and Block Grant Program.

Title II of the Americans with Disabilities Act of 1990 and the Olmstead Decision

Title II prohibits discrimination based on disability in programs, services, and activities provided or made available by public entities. HUD enforces Title II when it relates to state and local public housing, housing assistance and housing referrals. The Olmstead decision put forth federal requirements on how agencies that receive federal assistance should encourage integrated housing opportunities for those with disabilities to ensure housing choice, reinforcing self-determination.

Architectural Barriers Act of 1968

The Architectural Barriers Act requires that buildings and facilities designed, constructed, altered, or leased with certain federal funds after September 1969 must be accessible to and useable by handicapped persons.

Age Discrimination Act of 1975

The Age Discrimination Act prohibits discrimination on the basis of age in programs or activities receiving federal financial assistance.

Title IX of the Education Amendments Act of 1972

Title IX prohibits discrimination on the basis of sex in education programs or activities that receive federal financial assistance.

Executive Order 11063 (1962)

Executive Order 11063 prohibits discrimination in the sale, leasing, rental, or other disposition of properties and facilities owned or operated by the federal government or provided with federal funds.

Executive Order 11246 (1965)

Executive Order 11246, as amended, bars discrimination in federal employment because of race, color, religion, sex, or national origin.

Executive Order 12892 (1994)

Executive Order 12892, as amended, requires federal agencies to affirmatively further fair housing in their programs and activities, and provides that the Secretary of HUD will be responsible for coordinating the effort. The Order also establishes the President's Fair Housing Council, which will be chaired by the Secretary of HUD.

Executive Order 12898 (1994)

Executive Order 12898 requires that each federal agency conduct its program, policies, and activities that substantially affect human health or the environment in a manner that does not exclude persons based on race, color, or national origin.

Executive Order 13166 (2000)

Executive Order 13166 eliminates, to the extent possible, limited English proficiency as a barrier to full and meaningful participation by beneficiaries in all federally-assisted and federally conducted programs and activities.

Executive Order 13217 (2001)

Executive Order 13217 requires federal agencies to evaluate their policies and programs to determine if any can be revised or modified to improve the availability of community-based living arrangements for persons with disabilities.

In addition to federal fair housing laws that apply to all transactions, including lending and insurance, the following federal laws specifically address lending practices s:

- *The Equal Credit Opportunities Act* – 15 U.S.C.A. Section 1691 et seq.- prohibits creditors from discriminating against credit applicants on the basis of race, color, religion, national origin, sex, marital status, age, because an applicant receives income from a public assistance program, or because an applicant has in good faith exercised any right under the Consumer Credit Protection Act.
- *The Home Mortgage Disclosure Act* – 12 U.S.C. Section 29011 et seq.
- *The Community Reinvestment Act* – 12 U.S.C. Section 2901 et seq.

Current State Laws

The Ohio Fair Housing Law [O.R.C. 4112.02(H)] gives all persons in the federally protected classes the right to live wherever they can afford to buy a home or rent an apartment. The Ohio law also adds two additional protected classes: ancestry and military status (Appendix 13).

According to Ohio law, it is unlawful, on the basis of race, color, religion, sex, national origin, ancestry, military status, disability, or familial status to:

- Refuse to rent, sell, finance, or insure housing accommodations or residential property
- Represent to any person that housing accommodations are not available for inspection, sale, rental, or lease
- Refuse to lend money for the purchase, construction, repair, rehabilitation, or maintenance of housing accommodations or rental property
- Discriminate against any person in the purchase, renewal, or terms and conditions of fire, extended coverage, of homeowners or renter's insurance
- Refuse to consider without prejudice the combined income of both spouses
- Print, publish, or circulate any statement or advertisement which would indicate a preference or limitation
- Deny any person membership in any multiple listing services or real estate broker's organization

Section 3: Ohio Development Services Agency Community Development Programs

The State of Ohio, through the Ohio Development Services Agency's Office of Community Development (OCD), administers Ohio's Community Development Block Grant (CDBG), HOME Investment Partnerships, Emergency Solutions Grant and Housing Opportunities for Persons With AIDS program funds received from HUD for non-entitlement communities. OCD distributes these federal funds and state funds, based on both an allocation basis and competitive process, to eligible local governments and nonprofit agencies. These funds help Ohio's communities prepare for growth and job creation by providing funding for community development, infrastructure improvements and economic development. OCD administers the following programs:

- Appalachian Development Program: support economic development, job creation or community development within the 32-county Appalachian region
- Economic Development and Public Infrastructure Program: provide loans to improve infrastructure and for fixed asset financing for land, building, machinery and site preparation directly and primarily related to creating, expanding or retaining a business in the community
- Community Development Programs
 - *Allocation Program*: improve public facilities, public services, housing, economic development and fair housing
 - *Downtown Revitalization*: improve Central Business Districts, aid in eliminating slums or blighted structures, and create and retain permanent, private-sector job opportunities for low- and moderate-income individuals
 - *Neighborhood Revitalization*: improve the quality of life, livability and functionality of distressed areas and neighborhoods through public infrastructure projects
 - *Critical Infrastructure*: fund public infrastructure improvements with a significant community impact
- Residential Public Infrastructure Grant Program: create safe and reliable drinking water and ensure communities' sanitary waste is properly disposed
- Community Housing Impact and Preservation Program: flexible, community-wide approach to improve and provide housing for low- and moderate-income individuals
- Housing Opportunities for People with AIDS: provide housing and supportive services to low- and moderate-income persons with AIDS or HIV-related diseases
- Housing Assistance Grant Program: promotes affordable housing opportunities and improves housing conditions through emergency home repair for individuals at or below 50 percent of Area Median Income and provides limited down payment assistance
- Homeless Crisis Response Program: provide homeless prevention services and emergency shelters and housing resources to nonprofit organizations, local governments and public housing authorities that serve the housing needs of homeless people and people facing homelessness

- Supportive Housing Program: reduce homelessness in Ohio and provide funding for transitional and permanent supportive housing to nonprofit organizations, local governments, and public housing authorities that provide transitional housing to homeless families and permanent supportive housing for homeless disabled persons

Section 4: State of Ohio Fair Housing Requirements and Initiatives

Title I of the Housing and Community Development Act of 1974, as amended, requires each unit of general local government that receives Community Development Block Grant (CDBG) funding from a state to certify that it will affirmatively further fair housing (see also 24 Code of Federal Regulations (CFR) 570.487(b)). To ensure that state-funded, non-entitlement jurisdictions take actions that promote fair housing choice at the local level, OCD developed a mandatory Standard Fair Housing Program that incorporates training, outreach, technical assistance, and a locally developed Analysis of Impediments (Appendix 14). As a condition of funding, each local government grant recipient must develop and implement a Standard Fair Housing Program. OCD provides training and technical assistance throughout the grant cycle and evaluates the implementation of the Standard Fair Housing Program during compliance monitoring.

State of Ohio Standard Fair Housing Program

The Standard Fair Housing Program is a community-based framework of analysis, outreach, training and technical assistance that serves to affirmatively further the purposes of the Fair Housing Act. Through this program, local governments actively promote fair housing by appointing a local contact, analyzing impediments to fair housing choice and providing targeted public education.

Local Fair Housing Contact

Each OCD CDBG subrecipient is required to identify a local fair housing contact. The local fair housing contact is a local government employee who provides general information, receives and processes fair housing complaints and refers cases to the Ohio Civil Rights Commission. Local governments may also retain a consultant or local agency to assist with complaint processing and implementing the Standard Fair Housing Program. OCD maintains and publishes a list of local fair housing contacts and associated consultants and local agencies to promote collaboration. The list is available on the Ohio Development Services' Fair Housing webpage.

Education

The Standard Fair Housing Program provides essential education regarding discrimination and fair housing rights. Local governments design an annual training program that includes presentations to residents of areas targeted for federal assistance; special populations affected by federally assisted projects; direct beneficiaries of federal housing assistance; and three additional schools, organizations or civic groups.

Outreach

To reach a broad community audience, local governments also develop an annual plan to distribute fair housing brochures, pamphlets, posters and other informational materials to 10 area agencies, organizations, or public events.

Analysis of Impediments to Fair Housing

To help target education and outreach efforts, local governments must conduct a comprehensive analysis to identify impediments to fair housing choice within their jurisdiction. The analysis should identify policies, actions, omissions, or decisions that restrict housing choices on the basis of the seven protected classes listed in the Fair Housing Act: race, color, religion, sex, disability, familial status, and national origin. Ohio's Fair Housing Act (Ohio Revised Code 4112) expands the list of protected classes to include ancestry and military status. Local governments use the Analysis of Impediments to Fair Housing to develop strategies to address and overcome discriminatory policies and practices. Each non-entitlement county and its local municipalities are covered by an Analysis of Impediments to Fair Housing.

New Horizons Fair Housing Assistance Program

Ohio encourages non-entitlement jurisdictions to undertake focused actions – beyond the required Standard Fair Housing Program – to promote fair housing choice and eliminate discriminatory housing practices. OCD's New Horizons Fair Housing Assistance Program provides discretionary funds to units of local government, or consortia of units of local government, to implement innovative training, outreach, and planning activities that serve to affirmatively further fair housing. New Horizons fair housing strategies are based on locally assessed needs and further the state's fair housing goals. Eligible jurisdictions include direct Community Development Program Allocation cities and counties. OCD allocates up to \$50,000 annually to the New Horizons Fair Housing Assistance Program

Monitoring for Compliance and Provision of Training & Technical Assistance

OCD monitors all grants funded with federal dollars for compliance with fair housing requirements. OCD provides training on the state's Standard Fair Housing Program during program application trainings for both the Community Development and Community Housing Improvement and Preservation Programs. OCD staff provides training and technical assistance to address noted issues when fair housing deficiencies are identified. Depending on the frequency and/or severity of the compliance violation, OCD is empowered to pursue progressive correction actions up to and including canceling a grant, recapturing funds, and de-certifying the grantee as an eligible CDBG recipient.

Section 5: Fair Housing Complaint Data and the Fair Housing Assistance (FHAP) and Fair Housing Initiatives (FHIP) Programs

HUD shares its authority to investigate housing discrimination complaints with state and local government agencies that are certified through its Fair Housing Assistance Program (FHAP). FHAP agencies enforce state and local laws that provide rights, resolutions, procedures, and opportunities for judicial review that are substantially equivalent to those provided in the federal Fair Housing Act. In Ohio, the Ohio Civil Rights Commission (OCRC) is the statewide FHAP agency, with regional offices in Akron, Cincinnati, Cleveland, Columbus, Dayton and Toledo. Four additional FHAP organizations serve specific localities: the City of Canton Fair Housing Commission, the Dayton Human Relations Council, the City of North Olmstead, and the Shaker Heights Fair Housing Review Board.

This section presents statewide discrimination complaints filed with HUD’s Office of Fair Housing and Equal Opportunity (FHEO) and FHAP agencies between July 1, 2013 and June 30, 2014 (Appendix 15). This section also provides an overview of HUD’s Fair Housing Initiatives Program (FHIP), and the currently funded FHIP organizations in Ohio, many of whom serve on OCD’s Fair Housing Advisory Board Committee.

The OCRC compiles information on all complaints related to housing discrimination in Ohio. These include complaints that are investigated by HUD as well as those investigated by FHAP partners. Individuals who believe they experienced discrimination in their search for a home, based on their color, race, national origin, sex, religion, disability, or familial status, have one year to file a complaint with HUD. Information collected on these complaints includes the local jurisdiction of the complaint, basis (there may be multiple bases), type of complaint, and complaint outcome.

Residents also may register housing discrimination complaints at private fair housing organizations. HUD provides funding to these organizations under the Fair Housing Initiatives Program (FHIP) to conduct intake, investigation, mediation, and litigation of housing discrimination complaints. However, these organizations do not provide full services statewide.

Basis of Federal Housing Discrimination Complaints

An individual filing a complaint indicates the basis for the alleged discrimination. Complaints to HUD indicate one of the seven prohibited bases—race, color, religion, national origin, sex, disability, and familial status, as described in the Fair Housing Act. In addition, a complaint may indicate the allegation of retaliation. In Ohio, a complainant may also file on the basis of military status or ancestry. An individual complaint can indicate multiple bases.

In the following table, between July 1, 2013 and June 30, 2014, 36 percent of the complaints in Ohio were filed in non-entitlement jurisdictions. The most common basis for complaint, both statewide and in non-entitlement jurisdictions, is disability. Among non-entitlement jurisdictions, the second most commonly cited basis for complaint is familial status, followed by race.

Table 9: Summary of Civil Rights Cases in Ohio (July 1, 2013 to June 30, 2014)		
	All Ohio	Non-Entitlement
Total Cases	478	171
No Cause	36.40%	32.75%
Race	14.80%	18.26%
Disability	56.25%	68.70%
Sex	4.90%	5.22%
National Origin	1.97%	2.61%
Color	1.31%	3.48%
Familial Status	23.68%	21.74%
Religion	2.30%	0.88%
Retaliation	7.89%	9.67%

Source: Ohio Civil Rights Commission

Resolution of Federal Housing Discrimination Complaints

Complaints can be resolved, or closed, in several ways by HUD and/or FHAP agencies. One means of closure is through conciliation, settlement or other resolution, arranged either privately or through the investigating agency. Conciliation/settlement accounted for 31 percent of all closures between July 1, 2013 and June 30, 2014. Cases closed because no reasonable basis was found for the complaint account for 37 percent of all complaints. “Administrative” closures (complaint withdrawn by complainant, unable to locate complainant, complainant failure to cooperate, or lack of jurisdiction) account for 11 percent of complaints. Statewide, FHAP agencies found probable cause in 9 percent of filed complaints.

Fair Housing Initiatives Program

The Fair Housing Initiatives Program (FHIP) was created under Section 561 of the Housing and Community Development Act of 1987 to help promote equal housing opportunities. Under it, HUD provides funding to public, private, and nonprofit groups to conduct fair housing enforcement and education activities. FHIPs are generally provided under three main categories discussed below.

The role of local programs created under FHIP is to:

- 1) Increase compliance with the Fair Housing Act and substantially equivalent state and local fair housing laws;
- 2) Educate the public and housing industry about their rights and responsibilities under the Fair Housing Act; and
- 3) Establish a network of experienced fair housing enforcement organizations throughout the country.

Education and Outreach Initiative (EOI)

An EOI provides funding to develop, implement, and carry out or coordinate education and outreach programs that inform the public about their rights and responsibilities under federal, state, and local fair housing laws. EOIs also can make referrals to HUD for possible fair housing violations. The primary ways that EOIs educate the public are through workshops, seminars, and other public events.

Private Enforcement Initiative (PEI)

A PEI provides funding for investigating housing discrimination complaints (including complaint-based and targeted testing) and administrative or judicial enforcement of federal, state, or local fair housing laws.

Fair Housing Organizations Initiative (FHOI)

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

As illustrated in the table below, six fair housing organizations in Ohio received nine FHIP grants in FY 2013 (Appendix 16). All six organizations received funding for the Private Enforcement Initiative. One received an additional grant for the Education and Outreach Initiative and two received additional funds for the Fair Housing Organization Initiative.

Table 10: Summary of FY 2013 FHIP Grants

Organization	City	Initiative
Fair Housing Contact Services, Inc.	Akron	PEI, EOI
Housing Opportunities Made Equal of Greater Cincinnati, Inc.	Cincinnati	PEI
Housing Research & Advocacy Center	Cleveland	PEI
Miami Valley Fair Housing Center, Inc.	Dayton	PEI, FHOI
Fair Housing Resource Center, Inc.	Painesville	PEI
Fair Housing Opportunities Inc. dba Fair Housing Center	Toledo	PEI, FHOI

Source: U.S. Department of Housing and Urban Development

These FHIP organizations provide important services to further fair housing in Ohio. Their direct services to clients serve as a less formal alternative to filing a government complaint. Their programs, designed to prevent or eliminate discriminatory housing practices, include:

- Conducting complaint intake and investigations;
- Mediating and litigating housing discrimination complaints;
- Testing the housing, lending, and insurance markets;
- Administrating judicial enforcement of federal, state, and local fair housing laws; and
- Providing education and outreach programs to inform the public about fair housing laws.

Section 6: Partnerships

OCD collaborates with local governments, fair housing organizations, state agencies, and other stakeholders at an annual Fair Housing/New Horizons Fair Housing Assistance Program Advisory Committee meeting. In addition, OCD works closely with the Coalition on Homelessness and Housing in Ohio (COHHIO) and the Ohio Housing Finance Agency (OHFA) to address fair housing issues associated with homelessness and access to affordable housing.

Fair Housing/New Horizons Fair Housing Assistance Program Advisory Committee

As part of the citizen participation process for the Ohio Consolidated Plan, OCD convenes a Fair Housing/New Horizons Fair Housing Assistance Program Advisory Committee each year. The committee meeting is open to the public and OCD draws committee members from fair housing organizations, the Ohio Civil Rights Commission, COHHIO, OHFA, entitlement and non-entitlement local governments, advocacy organizations, and state agencies. Table 11 lists the organizations that served on the Fair Housing/New Horizons committee from 2011 to 2015. Four of Ohio’s six current FHIP organizations - Housing Opportunities Made Equal of Greater Cincinnati, Inc., Housing Research & Advocacy Center, Miami Valley Fair Housing Center, Inc., and the Toledo Fair Housing Center –serve on the committee. The annual meeting provides an opportunity for a wide array of stakeholders to engage in productive discussion regarding OCD’s programs, fair housing requirements, and training efforts. The committee also discusses the state of fair housing in Ohio, and offers recommendations on how OCD can enhance training and outreach to address specific issues.

Participant Organization	Type of Organization
Access Center for Independent Living	Center for Independent Living
The Ability Center of Greater Toledo	Center for Independent Living
Hocking, Athens, Perry Community Action Agency	Community Action Agency
WSOS Community Action	Community Action Agency
Ohio Regional Development Corporation	Development Consultant
Ohio Capitol Corporation for Housing	Development Corporation
Donald B. Eager and Associates	Fair Housing Consultant
Toledo Fair Housing Center	Fair Housing Organization (FHIP)
Housing Opportunities Made Equal	Fair Housing Organization (FHIP)
Housing Research & Advocacy Center	Fair Housing Organization (FHIP)
Miami Valley Fair Housing Center	Fair Housing Organization (FHIP)
Greene County	Local Government
Licking County	Local Government
City of Chillicothe	Local Government
City of Zanesville	Local Government
Gallia County	Local Government
Miami County	Local Government
City of Cambridge	Local Government
Guernsey County	Local Government

Brown County	Local Government
Coalition on Housing and Homelessness in Ohio	Non-profit Organization
Advocates for Basic Equality	Legal Aid
LUC Regional Planning Commission	Regional Planning Commission
Marion City/County Regional Planning Commission	Regional Planning Commission
Crawford County Regional Planning Commission	Regional Planning Commission
Ohio Department of Aging	State Agency
Ohio Attorney General Office	State Agency
Ohio Department of Job and Family Services	State Agency
Ohio Civil Rights Commission	State Agency (FHAP)
Ohio Development Services Agency	State Agency
Ohio Housing Finance Agency	State Agency

Source: Ohio Development Services Agency

Ohio Fair Housing Contacts List

At the Program Year 2015 Fair Housing/New Horizons Fair Housing Assistance Program Advisory Committee meeting, members expressed a need for a convenient mechanism for sharing information and coordinating fair housing efforts throughout the year. To this end, the Miami Valley Fair Housing Center, Inc. established the Ohio Fair Housing Contacts electronic mailing list as a forum for committee members, fair housing organizations, local fair housing contacts (appointed as part of non-entitlement jurisdictions' Standard Fair Housing Program) and others to share ideas and discuss current fair housing topics. OCD uses the mailing list regularly to distribute information regarding state and federal fair housing policies, regulations, and legislation.

Coalition on Homelessness and Housing in Ohio (COHHIO)

COHHIO is involved in a range of housing assistance services in Ohio, including homeless prevention, emergency shelters, transitional housing and permanent affordable housing with linkages to supportive services. COHHIO assists hundreds of housing organizations and homeless service providers in Ohio through public policy advocacy, training and technical assistance, research and public education.

COHHIO is one of OCD's key technical assistance partners, completing the *State of Homelessness Report* and overseeing administering the Ohio Balance of State Continuum of Care program, which carries out planning responsibilities for and represents the 80 rural counties in Ohio. COHHIO also partners with OCD to provide specialized training and technical assistance regarding the nuanced intersection of fair housing law and Ohio Landlord-Tenant Law (Ohio Revised Code 5321).

As part of OCD's required Standard Fair Housing Program, local government grantees must have a local fair housing contact to receive, process, and address complaints. The local fair housing contact must be able to discern if a complaint is associated with a protected class under the Fair Housing Act, and, if it is, work with the complainant to formally submit the case to the Ohio Civil Rights Commission. Often, however, complaints fall under Ohio Landlord-Tenant Law, and have no recourse under the Fair Housing Act. In such cases, local fair housing contacts are often unequipped to provide guidance. COHHIO's toll-free Tenant Rent Information

Line addresses this need, and provides an invaluable resource for OCD grantee local fair housing contacts.

Ohio Housing Finance Agency (OHFA)

OHFA facilitates developing, rehabilitating and financing low- to moderate-income housing. The Agency's programs help first-time homebuyers, renters, older adults, and others find quality affordable housing that meets their needs. Formerly a division of the Ohio Development Services Agency, OHFA became an independent state agency on July 1, 2005, through Amended Substitute House Bill (HB) 431. OHFA funds competitive fixed-rate mortgage loans and provides financing for developing and rehabilitating affordable rental housing through the Housing Tax Credit program, issuing tax-exempt mortgage revenue bonds, and other affordable housing programs.

OHFA helps low- to moderate-income Ohioans purchase homes and provides opportunities through financing quality and affordable rental housing. The Agency offers financial incentives for developers to increase the supply of affordable rental housing. OHFA administers different funding programs, including the Housing Tax Credit program, which for-profit and nonprofit developers can use to develop new or rehabilitate existing affordable rental housing. The Agency helps property managers maintain safe, affordable housing environments through its compliance programs. OHFA monitors more than 1,000 multifamily properties throughout the state. Finally, the Agency provides financing for competitive fixed-rate mortgages by issuing tax-exempt mortgage revenue bonds and partners with real estate professionals and mortgage lenders. Since its creation, OHFA has made affordable mortgage loans to more than 145,500 Ohioans and facilitated creating more than 104,500 affordable rental housing units.

OHFA is governed by an 11-member board. The Board consists of the Directors of the Ohio Department of Commerce and Ohio Development Services Agency, and nine public members. The Governor appoints the nine public members for six-year terms to represent various housing sectors and the public. The Director of the Ohio Development Services Agency serves as Chairman of the Board.

OHFA serves as a critical partner to ODSA in preserving and developing affordable housing, as well as in affirmatively furthering fair housing, in Ohio. ODSA partners with OHFA to fund the Housing Development Assistance Program with HOME Investment Partnership funds and funds from the Ohio Housing Trust Fund. Through this program, OHFA primarily facilitates developing and preserving affordable housing units, including those serving individuals with mental health issues and developmental disabilities.

One of the four themes of the 2015 Qualified Action Plan developed by OHFA is “expanding the range of housing choices for Ohioans and furthering compliance with the Fair Housing Act.”

To illustrate OHFA’s commitment to affirmatively furthering fair housing, an Affirmative Fair Housing Marketing Plan is required for all developments. Additionally, as excerpted from OHFA’s 2015 Qualified Action Plan:

*All newly constructed units developed under OHFA guidelines shall be designed to comply with the Fair Housing Act (FHA) - **even those units not covered by the Act.** Units that are being rehabbed shall be designed to incorporate these features to the greatest extent possible. In a two or more story single-family house or townhome, all floors must be designed in accordance with three through seven below. To be clear, this means that all bathrooms,*

kitchens, hallways, doors, light switches, electrical outlets, thermostats and other environmental controls must conform to those requirements.

Compliance with the Fair Housing Act calls for seven basic design and construction requirements.

- 1. An accessible building entrance on an accessible route. All units must have at least one no-step entrance and be on an accessible route. An accessible route means a continuous, unobstructed path connecting accessible elements and spaces within a building or site that can be negotiated by a person with a disability who uses a wheelchair, and that is also safe for and usable by people with other disabilities. An accessible entrance is a building entrance connected by an accessible route to public transit stops, accessible parking and passenger loading zones, or public streets and sidewalks.*
- 2. Accessible common and public use areas. Developments must have accessible and usable public and common-use areas. Public and common-use areas cover all parts of the housing outside individual units. They include -- for example -- building-wide fire alarms, parking lots, storage areas, indoor and outdoor recreational areas, lobbies, mailrooms and mailboxes and laundry areas.*
- 3. Usable doors (usable by a person in a wheelchair). All doors that allow passage into and within all premises must be wide enough to allow passage by persons using wheelchairs.*
- 4. Accessible route into and through the dwelling unit. There must be an accessible route into and through each unit. This includes all hallways, stairways and doorways.*
- 5. Light switches, electrical outlets, thermostats and other environmental controls in accessible locations. Light switches, electrical outlets, thermostats and other environmental controls must be in accessible locations.*
- 6. Reinforced walls in bathrooms for later installation of grab bars. Reinforcements in bathroom walls must be installed, so that grab bars can be added when needed.*
- 7. Usable kitchens and bathrooms. Kitchens and bathrooms must be usable - that is, designed and constructed so an individual in a wheelchair can maneuver in the space provided. Notifications to Statewide Accessibility Organizations Applicants must also notify the appropriate statewide accessibility group, which are identified on the OHFA website, at the time of application that accessible housing is being proposed, agree to accept referrals for potential residents, and agree to receive design suggestions for the property. Such notification must take place again when the development is placed into service. Copies of correspondence between the applicant and accessibility group must be submitted to evidence these requirements.*

Section 7: State of Ohio Identified Impediments & Action Plan

Impediments Identified in Non-entitlement Analysis of Impediments to Fair Housing

The State of Ohio operates on a five-year Consolidated Plan cycle, and OCD requires non-entitlement local government grantees to conduct a new Analysis of Impediments (AI) at the beginning of each cycle as part of their Standard Fair Housing Program. In the intervening years, grantees prepare an update to the AI. Grantees submit the AI documents and the annual updates to OCD for review, and the most recent full AI submission coincided with state fiscal year 2011.

A survey analysis of the submitted 2011 to 2015 non-entitlement grantee AI documents reveals a number of commonly identified impediments:

1. *Lack of available affordable rental housing for the disabled:* The vast majority of local governments, 81%, indicated that the most significant impediment to fair housing in their community was the lack of affordable rental units. For older adults and people with disabilities, affordable housing choices are even harder to locate.
2. *Lack of affordable, accessible housing for older adults:* 70% of local governments indicated that the lack of accessible rental units was a significant impediment to fair housing, particularly for older adults and disabled populations.
3. *Lack of education or understanding of Fair Housing laws by Hispanic Ohioans, especially in northern and northwestern Ohio:* In many communities, the general public is unaware of fair housing laws. If people do not know their rights, they will not file complaints and impediments cannot be addressed. In addition, housing providers may not be aware of the applicable fair housing laws, and they may intentionally or unintentionally create impediments to fair housing choice. Local governments recommend improved education for the general public, local government officials, social service agencies and housing providers.
4. *Limited access to public transit in rural areas:* The scarcity of public transit options in Ohio's small cities and rural communities presents impediments to housing choice for those with disabilities, older adults, and individuals without personal automobiles. Access to transportation options in many cases may be the sole determination of where a family or individual is able to seek housing.

Table 12: Survey Analysis of the Non-entitlement Analysis of Impediments to Fair Housing in Ohio: 2011 to 2015

Impediment	Percent Identifying
Lack of Affordable Rental Housing	81%
Lack of Accessible Rental Housing	70%
Lack of Awareness and Education of Fair Housing Laws	33%
Lack of or Limited Public Transit Options	26%
Predatory Lending	22%
Nimbyism	19%
Racial and Ethnic Clustering/Segregation	15%
Racial and Ethnic Steering	15%
Exclusionary Zoning	15%
Unlawful or questionable advertising practices	11%
Enforcement of Fair Housing Laws	11%
Lack of Financial Literacy	11%
Lack of Housing Vouchers	7%
Lack of housing options for victims of domestic violence	4%
Local government fiscal challenges	4%
Repetitive Flooding	4%
High rate of foreclosures	4%
Limited access to Property Insurance	4%
Language barriers	4%
Prevalence of Lead Paint	4%
Low rates of Minority Homeownership	4%
Inability to participate in the workforce	4%

Source: Ohio Development Services Agency

The three most commonly identified impediments in non-entitlement grantee analyses - lack of available affordable rental housing, lack of accessible housing, and lack of education or understanding of Fair Housing laws – are reflected in the State of Ohio’s identified impediments, as discussed below. The fourth most commonly cited impediment – limited access to public transit – is a critical issue that is being addressed by the Ohio Department of Transportation.

Rural Transit Systems

According to the Ohio Department of Transportation, Ohio’s 34 rural transit agencies spend about \$38 million a year to provide service. Although this is a small portion (about 4%) of the overall transit investment, rural services operate in 35 counties and provide more than 2 million trips annually.

About half of existing funding for rural agencies comes from the federal government. Many rural areas also raise funds by contracting with human service agencies and other partners. Local funds, passenger fares and state funds are also important resources for the rural agencies.

There are about 550 vehicles in Ohio's rural fleet. An estimated 150 buses and vans are past their useful life and need to be replaced in the immediate term.

Rural areas also need more service. The analysis found a current need for an additional 1 million transit trips. By 2025, as Ohio's rural population continues to grow older and rely more on public transit, the need for service will grow to more than 4 million trips each year.

This estimate does not include the 27 Ohio counties that do not have any existing public transit service. These communities currently need roughly 2 million trips and are expected to need 3 million trips per year by 2025.

The 2015 investment needs for rural communities include:

- *System Preservation* - \$22 million to replace vehicles already beyond their useful lives, and \$11 million to purchase vehicles expiring in 2015 and fund other infrastructure needs.
- *System Expansion* - \$18 million to operate and \$11 million to purchase vehicles for additional service in areas that already have some transit.
- *New Systems* - \$48 million for transit service in the 27 counties that currently have none.

Noted Benefits of Investing in Rural Transit

- Ensure all Ohio residents have access to some public transportation. Expanding service to areas that currently do not have public transportation would reach an estimated 1 million individuals.
- Provide access to jobs, job training, health care and basic personal services. Expanding mobility is important statewide, but especially for people living in Ohio's small towns and rural communities and for employers needing a workforce that can get to work. Transportation needs in these areas are expected to increase as their populations grow older and poorer. Investing in services now will ensure the state has infrastructure in place to support individuals, Ohio businesses and health and human service programs.

The Ohio Department of Transportation's recommended short-term strategies to invest in rural transit to meet the needs of older adults, disabled, and low-income individuals and households include:

- Incentivize coordination between human service and public transportation. Grants may also support extending or providing service in counties where none exist.
- Establish a cabinet-level Human Service Transportation Coordinating Committee to examine statewide policies to encourage coordinated transportation services. Largely aimed at rural counties and systems, this committee would include, at minimum, the Ohio Department of Job and Family Services, Ohio Department of Medicaid, Ohio Department of Aging, and Ohio Department of Transportation.
- Establish a Blue Ribbon Funding Committee to identify and move forward a statewide dedicated public transportation funding source. This would benefit urbanized areas and also address significant rural transit needs.

State of Ohio Identified Impediments & Action Plan

Lack of available affordable housing units for people with disabilities

An estimated 13 percent of Ohioans identify as having a disability, and almost 70 percent of discrimination complaints in non-entitlement communities are based on disability (Table 9; Appendix 15). This suggests that individuals with disabilities may face a disproportionate difficulty in accessing suitable housing.

Tactics

- In March 2015, HUD awarded Ohio \$11.9 million for a five-year rental assistance program intended to expand affordable housing opportunities for individuals with disabilities and is expected to assist 508 households. The Ohio Housing Finance Agency will partner with the Ohio Department of Medicaid, Ohio Department of Developmental Disabilities, and the Ohio Department of Mental Health and Addiction Services to create and maintain a referral network to match individuals with disabilities with housing units throughout the state.
- The Ohio Department of Medicaid will use \$1 million annually from existing federal Money Follows the Person funds to increase the supply of housing for persons with disabilities living below 18 percent of the area’s Gross Median Income. The Ohio Department of Medicaid will partner with the Ohio Housing Finance Agency to provide five years’ worth of Project Based Rental Assistance to developers that increase the supply of Americans with Disabilities Act (ADA) accessible units in affordable housing developments from 10 percent (the current requirement to receive Low Income Housing Tax Credits) to 25 percent of total units. The purpose of the subsidy is to fill the gap between a 50-percent Low Income Housing Tax Credit unit rent and 30 percent of the tenant’s gross income. During the five-year pilot, the Ohio Department of Medicaid will work with the Office of Health Transformation to seek additional funding for this type of rental subsidy through other state agencies.
- In response to the Olmstead decision, Ohio’s Consolidated Plan (p. 122-123) encourages universal design as an objective to meet the needs of the disabled by developing housing to serve those with developmental disabilities, severe and persistent mental illness or mobility/sensory impairments.
- Provide specialized training to grantees to facilitate an understanding of basic universal design principles.
 - Training should include regulatory information and design considerations. OCD will conduct regional trainings to ensure that this area receives special attention.
- Share the Analysis of Impediments with the Fair Housing/New Horizons Fair Housing Assistance Program Advisory Committee and educate the members on the identified impediments to ensure advocacy for disabled populations.
- Link grantees with resources, agencies and organizations in the community that serve disabled residents.
- Discuss with communities how zoning and building codes can address housing barriers for disabled residents.
- Encourage grantees and local and regional fair housing agencies to explore if testing studies in community are feasible.
- Survey communities to determine general fair housing attitudes within Ohio.

Lack of affordable, accessible housing for older adults

Ohio is facing a large older adult population over the next 25 years. By 2040, 19.9 percent will be 65 years of age or older. Furthermore, 35.9 percent of disabled individuals are currently aged 65 or older. This demographic transition will require addressing occupational and housing needs.

Tactics

- Link grantees with resources, agencies and organizations in the community that serve older adults in the community.
- Coordinate with the Ohio Department of Aging to ensure grantees work with local area agency on aging offices to secure housing choices and other resources for older adults.
- Provide training to grantees to demonstrate how design principles can improve older adults' quality of life.
- Share the Analysis of Impediments with the Fair Housing/New Horizons Fair Housing Assistance Program Advisory Committee and educate the members on the identified impediments to ensure advocacy for older adults.
- Discuss with communities how zoning and building codes can address housing barriers for older adults, particularly those dealing with disabilities.

Need for enhanced fair housing education and outreach to the Hispanic population, especially in the northern and northwestern part of Ohio

While no data currently exists that suggests the Hispanic population experiences disproportionate housing discrimination, this community, which has grown by 76 percent since 2000 and tripled since 1980, should be the focus of targeted fair housing education and outreach. It is imperative that counties with higher than average concentrations of Hispanic individuals, especially in the north and northwest sections of the state, have fair housing outreach materials available in Spanish (Map 5).

Tactics

- Ensure grantees that have a higher concentration of Hispanic individuals provide fair housing materials in Spanish.
- Share the Analysis of Impediments with the Fair Housing advisory committee and ask members to advocate providing materials and training in Spanish.
- Link grantees with resources, agencies and organizations in the community that serve Hispanic residents.
- Offer specialized training that addresses impediments to fair housing for Hispanics at the OCD's annual training conference by 2020.
- Encourage grantees to develop or strengthen relationships with the Ohio Civil Rights Commission (OCRC) to address discrimination in the community through services the Commission provides.
- Ensure that grantees with a significant Hispanic population address impediments to fair housing for that population in their annual Analysis of Impediments submissions.

- Recommend communities conduct testing to uncover discrimination issues in the community.
- Research expanding electronic resources to include materials in Spanish on the Ohio Development Service Agency's fair housing webpage.

Map 1

Map 2

Map 3

Map 4

Source: 2009-2013 American Community Survey

Map 5

2009-2013 American Community Survey

Map 6

2009-2013 American Community Survey

Map 7: Census Tracts with Disability Percentage

Source: 2009-2013 American Community Survey

Map 8

Map 9: 2013 Unemployment Rates

Source: 2009-2013 American Community Survey

Appendix 1

Appendix 2: Ohio County Profiles: Appalachia

Appendix 3: Population Projections

*Designates CDBG Entitlement Communities

	2010 Census	2015	2020	2025	2030
Ohio Totals	11,536,504	11,549,120	11,574,870	11,598,670	11,615,100
Adams	28,550	28,410	28,380	28,210	28,100
Allen	106,331	104,790	103,560	102,420	101,450
Ashland	53,139	53,620	53,980	54,870	55,790
Ashtabula	101,497	101,430	101,230	100,880	100,130
Athens	64,757	64,180	64,700	64,500	63,960
Auglaize	45,949	45,780	45,590	45,150	44,690
Belmont	70,400	69,760	68,880	68,270	67,330
Brown	44,846	45,480	45,850	45,930	45,630
Butler*	368,130	378,370	390,110	399,880	410,960
Carroll	28,836	28,810	28,770	28,750	28,720
Champaign	40,097	39,880	39,690	39,250	38,690
Clark	138,333	135,490	133,240	131,390	129,900
Clermont	197,363	203,650	208,330	212,110	214,090
Clinton	42,040	42,160	42,100	42,060	41,590
Columbiana	107,841	106,660	105,380	104,370	103,870
Coshocton	36,901	36,650	36,190	35,660	34,790
Crawford	43,784	42,300	40,890	39,500	38,150
Cuyahoga*	1,280,122	1,242,380	1,209,550	1,179,030	1,154,210
Darke	52,959	52,190	51,270	49,670	48,280
Defiance	39,037	38,590	38,090	37,200	36,490
Delaware	174,214	192,990	210,630	227,930	246,000
Erie	77,079	75,070	72,900	70,350	67,740
Fairfield	146,156	156,220	165,850	176,850	187,820
Fayette	29,030	28,880	28,860	28,780	28,750
Franklin*	1,163,414	1,198,370	1,237,960	1,272,320	1,302,110
Fulton	42,698	42,350	42,200	41,500	40,740
Gallia	30,934	30,860	30,600	30,520	30,250
Geauga	93,389	93,650	93,510	94,270	94,930
Greene	161,573	163,500	164,940	165,950	165,780
Guernsey	40,087	39,480	38,750	38,000	37,310
Hamilton*	802,374	793,980	790,600	788,420	785,900
Hancock	74,782	75,130	75,330	75,620	75,140
Hardin	32,058	31,850	31,740	31,490	31,360
Harrison	15,864	15,660	15,300	15,210	15,100
Henry	28,215	27,690	27,230	26,760	26,360

Highland	43,589	44,040	44,320	44,700	44,720
Hocking	29,380	29,540	29,480	29,150	28,620
Holmes	42,366	43,610	44,620	45,230	45,700
Huron	59,626	59,360	58,740	57,860	56,950
Jackson	33,225	33,380	33,630	33,820	34,010
Jefferson	69,709	67,780	66,540	65,580	65,330
Knox	60,921	63,030	64,960	67,420	69,810
Lake*	230,041	229,530	228,600	228,320	228,380
Lawrence	62,450	62,330	62,390	62,230	62,390
Licking	166,492	173,520	180,860	188,810	196,570
Logan	45,858	45,810	45,600	45,210	44,590
Lorain	301,356	306,400	310,230	315,760	320,430
Lucas	441,815	435,300	430,450	425,620	420,080
Madison	43,435	44,510	45,670	46,510	47,420
Mahoning	238,823	231,210	224,680	218,320	212,240
Marion	66,501	66,860	67,130	67,250	67,170
Medina	172,332	179,200	184,670	190,430	194,510
Meigs	23,770	23,610	23,630	23,300	23,170
Mercer	40,814	40,960	41,040	41,240	41,230
Miami	102,506	102,700	102,590	103,160	103,500
Monroe	14,642	14,420	14,160	13,900	13,590
Montgomery*	535,153	524,370	513,830	504,770	496,650
Morgan	15,054	14,880	14,770	14,600	14,360
Morrow	34,827	36,180	37,380	38,490	39,400
Muskingum	86,074	85,790	85,420	84,870	83,900
Noble	14,645	14,760	14,900	15,080	15,280
Ottawa	41,428	40,860	40,100	39,420	38,720
Paulding	19,614	19,270	19,050	18,570	18,220
Perry	36,058	36,850	37,610	38,710	39,690
Pickaway	55,698	56,690	58,010	59,120	60,560
Pike	28,709	28,610	29,000	29,010	29,420
Portage	161,419	161,500	161,410	160,780	158,930
Preble	42,270	42,260	42,060	41,860	41,460
Putnam	34,499	34,550	34,430	34,180	33,860
Richland	124,475	122,180	120,200	118,190	116,640
Ross	78,064	78,990	79,850	80,740	81,510
Sandusky	60,944	59,960	58,670	57,040	55,440
Scioto	79,499	78,530	77,430	76,260	75,520
Seneca	56,745	56,030	55,050	54,030	53,040
Shelby	49,423	49,450	49,290	48,780	48,240
Stark*	375,586	371,650	368,210	364,650	361,130

Summit*	541,781	537,220	534,150	532,080	528,990
Trumbull	210,312	205,150	200,840	197,080	193,360
Tuscarawas	92,582	92,520	92,310	92,060	91,890
Union	52,300	55,990	59,760	63,900	68,230
Van Wert	28,744	28,180	27,620	26,810	26,190
Vinton	13,435	13,570	13,620	13,860	13,920
Warren*	212,693	220,430	225,770	231,230	235,640
Washington	61,778	60,410	59,000	57,620	56,220
Wayne	114,520	114,530	114,390	113,920	113,400
Williams	37,642	36,890	36,070	35,040	34,150
Wood	125,488	125,220	126,540	127,530	127,600
Wyandot	22,615	22,330	21,960	21,530	21,000

Source: Ohio Development Services Agency

Appendix 4

Appendix 5

Appendix 6: Ohio's Top Employers

Appendix 7

Appendix 8:

Appendix 9: 2013 Household Housing Costs by County

Appendix 10: 2013 Owner-Occupied Housing Costs by County

	Owner Occupied Housing Units	Median Value	Median Monthly Owner Costs	Monthly Owner Costs as Percentage of Household Income	Units With a Mortgage	Median Monthly Owner Costs	Monthly Owner Costs as Percentage of Household Income	Units Without a Mortgage	Median Monthly Owner Costs	Monthly Owner Costs as Percentage of Household Income
Ohio	3,074,792	\$130,800	\$983	19.5%	2,057,622	\$1,288	22.5%	1,017,170	\$438	12.7%
ADAMS	7,914	\$92,900	\$656	19.1%	4,444	\$979	24.0%	3,470	\$345	13.2%
ALLEN	27,815	\$105,000	\$784	18.3%	17,168	\$1,078	21.3%	10,647	\$394	12.2%
ASHLAND	15,090	\$122,100	\$827	19.4%	9,691	\$1,126	23.1%	5,399	\$391	12.7%
ASHTABULA	28,230	\$110,800	\$798	19.4%	17,010	\$1,090	23.1%	11,220	\$393	13.5%
ATHENS	12,561	\$115,500	\$693	17.6%	6,799	\$1,093	22.1%	5,762	\$389	12.1%
AUGLAIZE	13,616	\$129,400	\$852	17.7%	8,496	\$1,177	21.2%	5,120	\$385	11.5%
BELMONT	21,143	\$88,500	\$576	15.9%	10,780	\$961	20.2%	10,363	\$336	11.5%
BROWN	12,708	\$116,300	\$849	20.9%	8,234	\$1,115	24.1%	4,474	\$385	14.0%
BUTLER*	94,831	\$157,400	\$1,168	20.0%	69,821	\$1,427	22.3%	25,010	\$482	12.5%
CARROLL	8,753	\$110,400	\$762	18.7%	5,284	\$1,097	23.3%	3,469	\$341	11.7%
CHAMPAIGN	11,158	\$124,600	\$882	19.2%	6,940	\$1,188	22.5%	4,218	\$442	12.5%
CLARK	36,820	\$106,400	\$836	18.3%	23,328	\$1,117	21.5%	13,492	\$394	12.3%
CLERMONT	55,465	\$154,500	\$1,180	19.5%	39,510	\$1,446	21.8%	15,955	\$474	12.6%
CLINTON	10,671	\$118,600	\$934	20.0%	7,135	\$1,217	23.3%	3,536	\$412	12.7%
COLUMBIANA	30,560	\$96,000	\$705	17.4%	17,865	\$1,035	21.3%	12,695	\$343	11.3%
COSHOCTON	10,717	\$93,300	\$629	16.9%	5,972	\$990	22.1%	4,745	\$327	10.8%
CRAWFORD	12,349	\$87,300	\$692	18.0%	6,975	\$968	22.7%	5,374	\$377	11.9%
CUYAHOGA*	325,389	\$125,700	\$1,063	21.1%	216,398	\$1,355	23.8%	108,991	\$511	14.5%
DARKE	15,450	\$110,600	\$729	17.7%	8,892	\$1,057	21.8%	6,558	\$383	12.1%
DEFIANCE	11,524	\$106,100	\$809	17.7%	7,152	\$1,104	20.7%	4,372	\$410	12.2%
DELAWARE	52,814	\$246,300	\$1,743	20.8%	42,445	\$1,967	22.5%	10,369	\$640	12.0%
ERIE	22,063	\$135,200	\$897	19.4%	14,019	\$1,230	22.5%	8,044	\$449	13.4%
FAIRFIELD	39,540	\$163,700	\$1,187	19.6%	28,668	\$1,462	22.4%	10,872	\$441	11.3%
FAYETTE	7,188	\$107,000	\$770	19.7%	4,384	\$1,080	24.4%	2,804	\$408	13.3%
FRANKLIN*	258,092	\$150,800	\$1,252	20.8%	198,639	\$1,436	22.7%	59,453	\$524	13.0%
FULTON	13,041	\$128,900	\$966	19.8%	8,875	\$1,213	22.4%	4,166	\$439	13.0%
GALLIA	8,829	\$95,500	\$621	17.5%	4,130	\$1,129	22.4%	4,699	\$376	12.8%
GEAUGA	29,968	\$224,700	\$1,317	20.7%	20,841	\$1,692	23.9%	9,127	\$548	13.0%
GREENE	42,601	\$158,000	\$1,112	19.0%	29,515	\$1,439	21.9%	13,086	\$514	12.1%
GUERNSEY	11,564	\$94,000	\$622	17.9%	6,523	\$985	22.8%	5,041	\$334	11.6%
HAMILTON*	195,255	\$144,400	\$1,171	20.1%	140,516	\$1,406	22.6%	54,739	\$526	13.1%
HANCOCK	21,634	\$127,800	\$902	18.1%	14,130	\$1,223	20.8%	7,504	\$417	11.4%

HARDIN	8,066	\$95,600	\$752	18.7%
HARRISON	4,907	\$83,500	\$589	17.0%
HENRY	8,738	\$114,000	\$815	18.9%
HIGHLAND	11,996	\$101,800	\$819	20.2%
HOCKING	8,747	\$109,800	\$761	18.5%
HOLMES	9,480	\$151,400	\$656	15.7%
HURON	16,293	\$118,800	\$850	19.1%
JACKSON	8,934	\$89,600	\$709	18.6%
JEFFERSON	20,690	\$86,400	\$584	16.2%
KNOX	16,135	\$133,500	\$925	19.2%
LAKE*	70,497	\$151,300	\$1,092	20.3%
LAWRENCE	17,597	\$97,200	\$638	17.5%
LICKING	46,665	\$149,500	\$1,113	20.2%
LOGAN	13,438	\$118,600	\$838	19.0%
LORAIN	83,523	\$140,700	\$1,037	19.6%
LUCAS	110,797	\$108,700	\$951	20.2%
MADISON	10,426	\$144,100	\$1,058	19.9%
MAHONING	68,533	\$95,800	\$754	18.6%
MARION	16,988	\$98,600	\$764	18.2%
MEDINA	52,107	\$181,000	\$1,247	20.0%
MEIGS	7,596	\$82,600	\$541	17.7%
MERCER	12,541	\$124,200	\$768	16.9%
MIAMI	29,362	\$133,700	\$951	19.0%
MONROE	4,830	\$89,100	\$429	13.8%
MONTGOMERY*	138,081	\$112,800	\$984	20.3%
MORGAN	4,794	\$89,000	\$602	16.2%
MORROW	10,634	\$127,400	\$944	19.7%
MUSKINGUM	23,202	\$108,500	\$751	18.7%
NOBLE	3,919	\$77,300	\$439	14.4%
OTTAWA	14,184	\$136,000	\$848	18.5%
PAULDING	6,040	\$92,300	\$718	17.0%
PERRY	9,721	\$93,100	\$742	18.7%
PICKAWAY	14,303	\$149,200	\$1,064	19.6%
PIKE	7,803	\$96,200	\$684	17.8%
PORTAGE	41,607	\$150,300	\$1,045	19.4%
PREBLE	12,625	\$116,700	\$915	20.3%
PUTNAM	10,953	\$133,500	\$760	15.8%
RICHLAND	33,518	\$103,500	\$731	18.0%
ROSS	20,533	\$111,100	\$813	18.0%
SANDUSKY	18,110	\$110,400	\$846	18.7%
SCIOTO	20,484	\$88,200	\$643	17.6%

4,972	\$992	21.5%
2,699	\$891	21.6%
5,260	\$1,145	22.0%
7,762	\$1,054	24.4%
5,497	\$1,082	21.9%
4,992	\$1,077	22.3%
10,563	\$1,170	22.1%
4,957	\$1,028	22.2%
10,256	\$945	19.9%
10,836	\$1,217	22.4%
48,559	\$1,379	23.0%
9,255	\$1,008	21.5%
33,534	\$1,383	22.5%
8,586	\$1,129	21.6%
57,055	\$1,349	22.6%
74,582	\$1,216	22.9%
7,396	\$1,305	22.3%
40,820	\$1,093	22.1%
10,087	\$1,094	21.3%
38,478	\$1,524	22.4%
3,589	\$968	22.2%
7,017	\$1,135	21.3%
20,167	\$1,223	22.0%
1,849	\$876	19.6%
93,473	\$1,242	23.0%
2,433	\$1,021	22.1%
7,180	\$1,204	23.3%
14,229	\$1,075	22.2%
1,455	\$908	23.6%
8,506	\$1,241	22.6%
3,493	\$1,014	20.6%
5,923	\$996	22.0%
9,624	\$1,382	22.7%
4,174	\$1,072	22.7%
28,399	\$1,341	22.1%
8,373	\$1,159	23.4%
6,354	\$1,123	19.5%
19,919	\$1,079	22.0%
12,693	\$1,131	21.1%
11,468	\$1,117	22.1%
10,912	\$975	21.1%

3,094	\$378	12.6%
2,208	\$329	11.6%
3,478	\$434	13.8%
4,234	\$348	12.2%
3,250	\$321	12.0%
4,488	\$333	10.3%
5,730	\$412	11.9%
3,977	\$368	14.2%
10,434	\$359	12.0%
5,299	\$394	12.7%
21,938	\$471	13.2%
8,342	\$356	12.0%
13,131	\$425	12.5%
4,852	\$396	14.2%
26,468	\$448	12.8%
36,215	\$438	13.5%
3,030	\$474	13.1%
27,713	\$387	12.8%
6,901	\$405	12.5%
13,629	\$497	11.8%
4,007	\$324	12.4%
5,524	\$413	11.2%
9,195	\$398	11.2%
2,981	\$306	10.0%
44,608	\$468	14.0%
2,361	\$302	10.0%
3,454	\$430	12.8%
8,973	\$367	13.1%
2,464	\$333	10.0%
5,678	\$434	12.6%
2,547	\$384	10.8%
3,798	\$343	11.9%
4,679	\$439	12.4%
3,629	\$359	12.1%
13,208	\$470	12.7%
4,252	\$420	13.7%
4,599	\$395	10.0%
13,599	\$377	11.7%
7,840	\$375	12.2%
6,642	\$383	12.4%
9,572	\$363	13.0%

SENECA	15,672	\$97,900	\$713	17.1%	9,336	\$1,000	19.9%	6,336	\$363	12.0%
SHELBY	13,651	\$123,400	\$909	18.8%	8,892	\$1,160	21.6%	4,759	\$422	12.2%
STARK*	104,991	\$122,400	\$874	18.8%	68,635	\$1,159	21.9%	36,356	\$400	12.2%
SUMMIT*	149,549	\$135,600	\$1,014	19.5%	102,822	\$1,297	22.3%	46,727	\$466	12.9%
TRUMBULL	62,359	\$97,400	\$745	18.2%	36,653	\$1,079	22.1%	25,706	\$394	12.5%
TUSCARAWAS	26,370	\$108,700	\$753	17.8%	15,876	\$1,037	21.5%	10,494	\$371	12.0%
UNION	13,805	\$171,800	\$1,368	21.3%	10,613	\$1,599	23.0%	3,192	\$499	13.9%
VAN WERT	9,039	\$88,600	\$640	16.8%	5,038	\$984	20.7%	4,001	\$348	10.8%
VINTON	3,964	\$75,700	\$650	18.2%	2,296	\$933	22.2%	1,668	\$305	11.6%
WARREN*	59,662	\$188,500	\$1,435	19.9%	46,285	\$1,652	21.9%	13,377	\$513	12.2%
WASHINGTON	18,843	\$108,600	\$633	16.1%	10,003	\$1,056	21.0%	8,840	\$327	10.3%
WAYNE	31,103	\$135,300	\$858	18.2%	19,395	\$1,179	22.3%	11,708	\$420	11.2%
WILLIAMS	11,250	\$98,600	\$786	19.1%	7,013	\$1,045	22.3%	4,237	\$365	12.6%
WOOD	33,171	\$149,500	\$1,065	19.4%	22,910	\$1,359	21.8%	10,261	\$461	12.7%
WYANDOT	6,613	\$103,500	\$712	16.6%	3,900	\$973	20.6%	2,713	\$363	10.2%

Appendix 11: Property Tax Information by County

County Name	Tax Rate	Tax Base Exempt	Homestead Exemptions	Average Reduction	Total Reduction in Taxes
ADAMS	42.59	13.97%	2,331	\$239	\$688,305
ALLEN	48.31	18.09%	8,077	\$360	\$2,906,789
ASHLAND	48	15.28%	4,479	\$360	\$1,562,215
ASHTABULA	52.32	12.60%	8,948	\$374	\$3,345,279
ATHENS	53.01	30.27%	3,741	\$409	\$1,537,452
AUGLAIZE	45.46	9.81%	3,458	\$348	\$1,224,380
BELMONT	44.07	15.47%	6,389	\$325	\$2,125,621
BROWN	40.3	9.20%	3,517	\$291	\$1,050,592
BUTLER*	58.56	20.42%	22,519	\$425	\$9,580,269
CARROLL	40.37	5.69%	2,519	\$291	\$748,301
CHAMPAIGN	47.69	8.08%	3,081	\$371	\$1,142,017
CLARK	58.71	15.35%	11,642	\$446	\$5,205,834
CLERMONT	60.86	11.17%	13,080	\$393	\$5,142,189
CLINTON	45.83	11.29%	2,703	\$349	\$947,060
COLUMBIANA	43.65	13.09%	10,269	\$310	\$3,181,588
COSHOCTON	43.36	11.83%	2,903	\$342	\$991,560
CRAWFORD	52.29	11.67%	4,206	\$407	\$1,712,479
CUYAHOGA*	79.22	18.27%	101,179	\$581	\$58,854,906
DARKE	41.57	11.17%	4,913	\$303	\$1,506,342
DEFIANCE	46.74	11.97%	3,643	\$348	\$1,272,055
DELAWARE	67.42	14.64%	8,647	\$449	\$3,880,905
ERIE	49.65	12.73%	6,982	\$372	\$2,595,247
FAIRFIELD	52.24	11.02%	9,796	\$354	\$3,470,894
FAYETTE	45.91	14.55%	2,122	\$400	\$847,880
FRANKLIN*	77.26	23.46%	55,195	\$546	\$30,592,105
FULTON	55.2	16.12%	3,360	\$402	\$1,352,033
GALLIA	40.33	16.67%	2,943	\$297	\$873,350
GEAUGA	60.38	8.01%	7,625	\$437	\$3,338,137
GREENE	63.9	18.32%	11,442	\$440	\$5,213,017
GUERNSEY	49.04	17.49%	3,492	\$363	\$1,269,095
HAMILTON*	68.6	22.02%	46,529	\$475	\$22,852,261
HANCOCK	48.05	11.25%	5,234	\$357	\$1,870,813
HARDIN	43.75	12.57%	2,540	\$326	\$828,257
HARRISON	41.87	11.75%	1,758	\$323	\$569,355
HENRY	50.19	11.69%	2,386	\$398	\$948,632
HIGHLAND	40.06	10.73%	3,622	\$295	\$1,066,716
HOCKING	45.12	13.19%	2,456	\$341	\$837,075

HOLMES	45.11	5.96%	1,931	\$354	\$686,719
HURON	41.55	10.07%	4,452	\$306	\$1,361,027
JACKSON	41.94	17.82%	2,837	\$314	\$889,696
JEFFERSON	43.06	13.87%	7,070	\$311	\$2,244,956
KNOX	48.98	15.71%	4,677	\$366	\$1,712,917
LAKE*	60.65	7.97%	20,442	\$458	\$9,372,102
LAWRENCE	33.43	15.13%	6,364	\$247	\$1,568,975
LICKING	55.31	12.84%	11,844	\$388	\$4,792,417
LOGAN	44.39	9.47%	3,217	\$331	\$1,107,306
LORAIN	57.97	13.24%	23,827	\$417	\$9,935,496
LUCAS	69.96	17.08%	32,010	\$484	\$15,477,007
MADISON	50.59	18.09%	2,842	\$394	\$1,161,075
MAHONING	61.94	13.57%	23,678	\$426	\$10,120,830
MARION	46.08	15.57%	5,225	\$342	\$1,789,228
MEDINA	55.08	8.37%	13,154	\$411	\$5,404,022
MEIGS	40.38	8.71%	2,376	\$277	\$657,009
MERCER	48.52	9.02%	3,211	\$370	\$1,189,353
MIAMI	46.97	11.25%	8,513	\$340	\$2,896,038
MONROE	41.53	10.27%	1,442	\$310	\$477,064
MONTGOMERY*	81.73	17.61%	46,296	\$585	\$27,078,832
MORGAN	39.89	10.06%	1,409	\$294	\$413,952
MORROW	44.61	6.85%	2,629	\$332	\$873,507
MUSKINGUM	48.46	15.29%	6,893	\$361	\$2,580,197
NOBLE	37.24	16.33%	1,226	\$277	\$339,277
OTTAWA	39.47	7.36%	4,066	\$334	\$1,357,249
PAULDING	48.46	10.97%	1,863	\$376	\$700,741
PERRY	44.28	11.47%	2,718	\$339	\$922,404
PICKAWAY	47.19	14.46%	3,455	\$383	\$1,367,450
PIKE	43.94	16.66%	2,704	\$298	\$806,784
PORTAGE	54.53	19.69%	10,853	\$404	\$4,385,779
PREBLE	44.24	8.68%	3,858	\$332	\$1,279,369
PUTNAM	40.33	10.87%	2,444	\$319	\$778,552
RICHLAND	58.17	13.10%	10,461	\$408	\$4,264,561
ROSS	46.46	17.83%	5,993	\$339	\$2,081,742
SANDUSKY	44.08	14.41%	5,297	\$321	\$1,700,783
SCIOTO	47.06	25.79%	6,836	\$341	\$2,378,484
SENECA	45.1	11.83%	4,257	\$335	\$1,468,253
SHELBY	46.11	10.21%	3,507	\$344	\$1,228,956
STARK*	56.36	13.90%	32,564	\$412	\$13,420,295
SUMMIT*	68.16	12.61%	41,936	\$476	\$19,965,480
TRUMBULL	60.6	10.92%	20,772	\$431	\$8,954,679

TUSCARAWAS	47.63	9.92%	7,425	\$350	\$2,664,972
UNION	59.62	7.41%	2,576	\$437	\$1,124,731
VAN WERT	45.01	13.54%	2,889	\$357	\$1,032,035
VINTON	43.16	14.95%	1,371	\$294	\$403,385
WARREN*	61.05	14.51%	12,047	\$432	\$5,206,642
WASHINGTON	43.93	14.18%	5,529	\$306	\$1,694,571
WAYNE	55.71	15.68%	8,124	\$402	\$3,268,561
WILLIAMS	47.84	15.53%	3,302	\$363	\$1,207,038
WOOD	59.21	18.74%	8,104	\$412	\$3,337,859
WYANDOT	35.35	7.77%	1,931	\$275	\$530,063

Appendix 12:History of Civil Rights in Ohio⁴

Year	Event
1787	Northwest Ordinance (capital in Marietta, OH) declares slavery to not be permitted in Northwest Territory
1803	Ohio Constitution outlaws slavery
1835	Oberlin College admits black students
1851	Ohio Constitution Adopted- Denied the right to vote to women and African Americans
1865	Thirteenth Amendment (US) ended slavery
1867	Fourteenth Amendment (US) granted equal protection under the law
1870	Fifteenth Amendment (US) gave African-American men the right to vote
1884	Ohio passes the Ohio Public Accommodations Law, eliminating inequity in public facilities
1894	Ohio's first black State Senator elected
	Ohio Civil Rights Law passed to guarantee equal access to any public place
1923	Ohio decides to eliminate race as a criteria for voting
1949	American Housing Act of 1949
1959	Ohio Civil Rights Act passed
	Ohio Civil Rights Commission established
1965	Ohio's Laws Against Discrimination include housing discrimination
1967	Cleveland, OH elects first African-American mayor
1970	Dayton, OH elects first African-American mayor
1973	Ohio prohibits discrimination based on sex
1976	Ohio's Laws Against Discrimination include issuance of credit
1984	Ohio prohibits discrimination, based on handicap, in post-secondary institutions
1988	Ohio Civil Rights Commission signs work share agreement with HUD
2008	Ohio adds military status as protected class under civil rights laws

⁴"The History of Fair Housing As a Civil Right In the State of Ohio." *Ohio Development Services Agency*. Ohio State Legal Services Association. Web. 21 Apr. 2015.

Appendix 13: Protected Classes - Federal Fair Housing Act and Ohio Fair Housing Law

Class	Federal Law	State Law	Differences
Disability (state)/ Handicapped (federal)	(1) a physical or mental impairment which substantially limits one or more of such person's major life activities; (2) a record of having such an impairment; or (3) being regarded as having such an impairment, but such term does not include current, illegal use or addiction to a controlled substance (as defined in section 102 of the Controlled Substances Act (21 U.S.C. 802)) [Fair Housing Act Sec 802 [42 U.S.C.3602(h)]	a physical or mental impairment that substantially limits one or more major life activities, including the functions of caring for one's self, performing manual tasks, walking, seeing, hearing, speaking, breathing, learning, and working; a record of a physical or mental impairment; or being regarded as having a physical or mental impairment [ORC 4112.01(A)(13)]	Ohio's definition is more specific.
Family Status	One or more individuals (who have not attained the age of 18 years) being domiciled with- (1) a parent or another person having legal custody of such individual or individuals; or (2) the designee of such parent or other person having such custody, with the written permission of such parent or other person. The protections afforded against discrimination on the basis of familial status shall apply to any person who is pregnant or is in the process of securing legal custody of any individual who has not attained the age of 18 years. [Fair Housing Act Sec 802 [42 U.S.C.3602(k)]]	(a)One or more individuals who are under eighteen years of age and who are domiciled with a parent or guardian having legal custody of the individual or domiciled, with the written permission of the parent or guardian having legal custody, with a designee of the parent or guardian; (b) Any person who is pregnant or in the process of securing legal custody of any individual who is under eighteen years of age. [ORC 4112.01(A)(15)]	None
National Origin	The Equal Employment Opportunity Commission defines national origin discrimination broadly as including, but not limited to, the denial of equal employment opportunity because of an individual's, or his or her ancestor's, place of origin; or because an individual has the physical, cultural or linguistic characteristics of a national origin group. [29 C.F.R. Part 1606]	The State of Ohio does not define 'national origin'	N/A

Race	Not clearly defined by Title VII of the Civil Rights Act of 1964 or in any related laws	The State of Ohio does not define 'race'	N/A
Color	Not clearly defined by Title VII of the Civil Rights Act of 1964 or in any related laws	The State of Ohio does not define 'color'	N/A
Religion	Includes all aspects of religious observance and practice, as well as belief [Title VII of the Civil Rights Act of 1964]	The State of Ohio does not define 'religion'	N/A
Sex	The terms "because of sex" or "on the basis of sex" include, but are not limited to, because of or on the basis of pregnancy, childbirth, or related medical conditions; and women affected by pregnancy, childbirth, or related medical conditions [Title VII of the Civil Rights Act of 1964]	The terms "because of sex" and "on the basis of sex" include, but are not limited to, because of or on the basis of pregnancy, any illness arising out of and occurring during the course of a pregnancy, childbirth, or related medical conditions. [ORC 4112.01(B)]	Worded slightly different
Ancestry	No clear legal definition- U.S. Supreme Court "suggests that the terms 'national origin' and 'ancestry' were considered synonymous." [see: Espinoza v. Farah Mfg., 414 U.S. 86, 89 (1973).]	Not covered	N/A
Military Status	Not Covered	A person's status in "service in the uniformed services" as defined in section 5923.05 of the Revised Code. [4112.01(A)(22)]. "Service in the uniformed services" means the performance of duty, on a voluntary or involuntary basis, in a uniformed service, under competent authority, and includes active duty, active duty for training, initial active duty for training, inactive duty for training, full-time national guard duty, and performance of duty or trained member of	N/A

		the Ohio organized militia pursuant to Chapter 5923 of the Revised Code [ORC 5923.05(A)(e)].	
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Appendix 14: OCD Community Development Standard Fair Housing Program

Appendix 15: Resolution of Federal Housing Discrimination Complaints (July 1, 2013 to June 30, 2014)

Appendix 16:FY 2013 Fair Housing Initiatives Program (FHIP) Grants

Source: U.S. Department of Housing and Urban Development (http://portal.hud.gov/hudportal/documents/huddoc?id=MASTERBlurbs_FHEO.pdf)

Organization	City	Initiative	Amount	Description (from grant application)
Fair Housing Contact Services, Inc.	Akron	FY11 Private Enforcement Initiative – Multi-Year Component	\$325,000	Fair Housing Contact Service (FHCS) will continue delivering comprehensive fair housing investigation, testing, and enforcement activities to all persons protected under Federal, state, and local fair housing laws. FHCS will also expand activities to include systemic housing investigations, AFFH and the development of mobility counseling protocols and local policies to remove identified impediments to fair housing choice.
Fair Housing Contact Services, Inc.	Akron	Education and Outreach Initiative – Affirmatively Furthering Fair Housing Training Component	\$118,739	FHCS will continue delivering comprehensive fair housing investigation, testing, and enforcement activities along with expanded education and outreach. FHCS will expand activities to include the development and production of an AFFH curriculum to train recipients of federal funds and to provide to teachers and students, landlords and housing industry representatives, and state and local government personnel. FHCS will conduct outreach to households to provide information on available affordable housing in jurisdictions that have open, diverse, and equitable housing patterns, and work with developers to provide information on universal design and visitability standards.
Housing Opportunities Made Equal of Greater Cincinnati, Inc.	Cincinnati	FY13 Private Enforcement Initiative – Multi-Year Component	\$324,530	Housing Opportunities Made Equal of Greater Cincinnati (HOME) will provide comprehensive fair housing enforcement services under, state and local civil rights laws, including investigating client concerns, advising clients on enforcement options, and conducting systemic testing of the housing market. HOME will audit new multifamily construction to ensure compliance with the accessibility requirements of the FHA and review condominium and homeowner association rules for discrimination against families with children. HOME also will train local government departments on fair housing law and conduct advertising and

				presentations in the community to ensure that residents know their fair housing rights and are aware of HOME's services. Lastly, HOME will help families with Housing Choice vouchers make integrative moves to neighborhoods of opportunity and sponsor a roundtable to share best practices in building stable integrated communities.
Housing Research & Advocacy Center	Cleveland	FY13 Private Enforcement Initiative – Multi-Year Component	\$325,000	The Housing Research & Advocacy Center (Housing Center) will provide services to all protected class members in Ohio's Cuyahoga and Lorain Counties with a focus on tasks designed to reduce discrimination against persons with disabilities, African Americans, Hispanic/Latinos, Arab Americans and Muslims, and families with children. Enforcement-related activities will include assisting potential victims of housing discrimination through intake, investigation of complaints, and assistance with the filing of complaints with administrative agencies, fair housing audits, reviews of rental policies and procedures, monitoring housing advertisements for illegal statements, and housing related research reports. Education and outreach activities will include trainings for real estate professionals about fair housing laws, trainings for transitional housing residents and/or providers, and preparation and distribution of quarterly newsletters.
Miami Valley Fair Housing Center, Inc.	Dayton	FY11 Private Enforcement Initiative – Multi-Year Component	\$325,000	The Miami Valley Fair Housing Center, Inc. (MVFHC) will address housing discrimination through ongoing enforcement and education activities. MVFHC will continue to implement systemic investigation and enforcement by intake of allegations of housing discrimination, testing, and other investigative work to provide a just resolution for fair housing discrimination; mediation or other voluntary resolution of allegations of fair housing; and litigation of fair housing cases, including procuring expert witnesses. MVFHC will conduct fair housing and fair lending workshops for

				residential housing consumers, private and public housing professionals, and underserved individuals in all protected classes under Federal, state and local laws, and distribute print materials, PSAs and pre-recorded and live broadcast programs for TV, internet, and radio, certified professional curricula, and fair housing information on its websites.
Miami Valley Fair Housing Center, Inc.	Dayton	Fair Housing Organization Initiative – Lending Discrimination	\$325,000	The MVFHC will continue its lending discrimination work through: intake and investigation of lending discrimination and complaint support to enforce other fair lending laws. MVFHC will assist consumers with loan workouts, refinancing, or modifications resulting from violations of the FHA and provide education and counseling to those who may have encountered lending discrimination.
Fair Housing Resource Center, Inc.	Painesville	FY11 Private Enforcement Initiative – Multi-Year Component	\$325,000	Fair Housing Resource Center, Inc. (FHRC) will continue and expand systematic housing discrimination investigations via rental, lending, sales, zoning, and accessibility testing programs, and educational programs. The initiatives will be expanded through fair housing complaint and investigation services into the tri-county area of Lake, Geauga, and Ashtabula Counties. FHRC will also conduct one regional Fair Housing Seminar and six county-specific fair housing seminars; conduct an analysis of Ashtabula and Geauga Counties Community Housing Improvement Strategy to determine if they are AFFH; conduct monitoring of Lake County; expand EOI-s through various media outlets; and engage and involve the community in the tri-county region.
Fair Housing Opportunities Inc. dba Fair Housing Center	Toledo	FY12 Private Enforcement Initiative – Multi-Year Component	\$325,000	The Toledo Fair Housing Center (FHC) is the only fair housing enforcement agency offering comprehensive fair housing services to the Ohio counties of Lucas and Wood and the cities of Bowling Green and Toledo. Activities will include five project components: victims' assistance; complaint investigation; outreach; monitoring; and prevention. Under these components,

				FHC will intake, investigate, and resolve discrimination complaints, process complaints on all bases of allegations, and refer complaints to the HUD.
Fair Housing Opportunities Inc. dba Fair Housing Center	Toledo	Fair Housing Organization Initiative – Lending Discrimination	\$325,000	The Toledo Fair Housing Center (FHC) will carry out pre-application lending testing and conduct an audit of REO properties to determine if banks are maintaining properties equally in minority neighborhoods. FHC will conduct intake and investigate lending discrimination complaints; address systemic patterns and practices of discrimination; provide remedies for violations of fair housing laws and refer jurisdictional complaints to HUD.

