



Fair Housing Plan: 2008-2010

- Analysis of Impediments to Fair Housing Choice
 - Action Plan
-

Columbus &
Franklin County, Ohio

FINAL PLAN

Accepted by the City of Columbus-July 2008

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Commissioners-October 2008

Prepared by Community Research Partners for
The Columbus Urban League



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1

Introduction & Summary

This section describes HUD requirements for fair housing and outlines the components and methodology of this plan.

- 1.1 HUD Fair Housing Requirements
- 1.2 What is an Impediment to Fair Housing Choice?
- 1.3 Columbus & Franklin County Fair Housing Planning Methodology
- 1.4 Fair Housing Plan Outline
- 1.5 Summary of Progress since 2001 Fair Housing Plan

1.1 HUD Fair Housing Requirements

This document outlines how the City of Columbus and Franklin County will take steps to affirmatively further fair housing. The purpose of these actions is to ensure housing choice for all residents of Columbus and Franklin County by eliminating housing discrimination on the basis of race, color, religion, sex, disability, familial status or national origin.

Required by the U.S. Department of Housing and Urban Development (HUD), any community that administers Community Planning and Development (CPD) programs must produce a Fair Housing Plan. Columbus and Franklin County receive approximately \$15 million annually from the following CPD programs:

- Community Development Block Grant (CDBG)
- Home Investment Partnership (HOME)
- Emergency Shelter Grant (ESG)
- Housing Opportunities for Persons with AIDS (HOPWA)

HUD program regulations require that jurisdictions certify that they will affirmatively further fair housing as part of the obligations assumed when they accept HUD funds. These certifications are included in the jurisdiction's Consolidated Plan.

Components of Fair Housing Planning

As outlined in HUD's *Fair Housing Planning Guide*, a **Fair Housing Plan** consists of the following:

- An **Analysis of Impediments to Fair Housing Choice (AI)** that identifies impediments to fair housing choice within the jurisdiction; and
- A **Fair Housing Action Plan** that defines appropriate actions to overcome the effects of any impediments identified in the AI.

In fair housing planning, the jurisdiction must also maintain **Fair Housing Records** to monitor the actions taken to implement the Action Plan.

HUD interprets the broad obligations noted above to affirmatively further fair housing to more specifically mean that a jurisdiction should:

- Analyze and eliminate housing discrimination in the jurisdiction;
- Promote fair housing choice for all persons;
- Provide opportunities for inclusive patterns of housing occupancy regardless of race, color, religion, sex, familial status, disability and national origin;
- Promote housing that is structurally accessible to, and usable by, all persons, particularly persons with disabilities; and
- Foster compliance with the nondiscrimination provisions of the Fair Housing Act.

1.2 What is an Impediment to Fair Housing Choice

HUD defines an impediment to fair housing as any action, omission, or decision that restricts housing choice for persons who are part of a federally protected classification. Since protected classifications (racial minorities, families with children, persons with disabilities) are over- represented among low-income households, actions that restrict the availability of affordable housing in a jurisdiction are also considered impediments to fair housing.

Specifically, an impediment to fair housing choice is any action, omission, or decision in a jurisdiction:

- Taken because of race, color, religion, sex, disability, familial status or national origin that restricts housing choices or the availability of housing choice;
- That constitutes a violation, or potential violation, of the Fair Housing Act;
- That is counterproductive to fair housing choice, such as community resistance when minorities, persons with disabilities and/or low-income persons first move into white and/or moderate income areas, or resistance to the siting of housing facilities for persons with disabilities; or
- That has the effect of restricting housing opportunities on the basis of race, color, religion, sex, disability, familial status or national origin.

1.3 Columbus and Franklin County Fair Housing Methodology

The City of Columbus and Franklin County have often worked together in HUD planning processes. Since 1994, these communities have produced and updated a joint Consolidated Plan. In 1995 and 2001, the City and County worked together to prepare an Analysis of Impediments to Fair Housing Choice and Fair Housing Action Plan. For the 2008 update, they are again developing a joint Fair Housing Plan, with the Columbus Urban League (CUL) as the lead coordinating agency for preparing the plan. CUL retained Community Research Partners (CRP) to produce the Analysis of Impediments (AI) and facilitate the development of the Fair Housing Action Plan. Public Service Consulting assisted CRP by facilitating the focus groups for the AI.

Stakeholder Participation

Input from key stakeholder groups was an important part of developing the Analysis of Impediments (AI). Focus groups and interviews were used to gather information on public and private sector impediments to fair housing, the effectiveness of existing fair housing programs, and actions to address impediments. The focus groups occurred throughout January and February of 2008 and included the following:

- Columbus Realtists Association members (January 3)
- Non-profit housing organizations (January 8)
- Local government agencies (January 8)
- Community Reinvestment Act (CRA) lenders (January 9)
- Housing developers (January 16)
- Immigrant and refugee non-profit organizations (February 6)
- Columbus Realtors Association members (February 13)

A full list of focus group participants and interviewees is listed in the Appendix.

Upon completion of a draft AI, the Columbus Urban League (CUL) gathered further input for review of the AI and development of the Action Plan. This included in-depth meetings with various officials and departments from the City of Columbus and Franklin County on April 4th and April 8th, 2008 respectively.

Public Comment Period

Following completion of a full draft of the Analysis of Impediments and Fair Housing Plan, the City of Columbus ran a public notice in the Columbus Dispatch on July 14, 2008 asking for public comment. The public comment period was 15 days. At the end of the public comment period, no comments had been received and the City accepted the plan on July 30, 2008.

Franklin County made the document available to the public from August 24, 2008 to September 23, 2008. Notice regarding the document and the public comment period was placed in the Columbus Dispatch on August 24, 2008. No comments were received during this period. The Franklin County Commissioners discussed the Fair Housing Plan during their general briefing meeting on October 2, 2008. There were no public comments on the plan. The Commissioners adopted the plan by resolution 0858-08 on October 7, 2008.

Data Sources

A variety of information sources were used in the preparation of the AI. These sources are cited throughout the report and include:

- Local planning documents, including the Consolidated Plan and the Columbus Metropolitan Housing Authority 5-Year Plan;
- Local, state and federal organizations involved in housing finance, development, sale, regulation, enforcement, policy and advocacy; and
- Literature and Internet research.

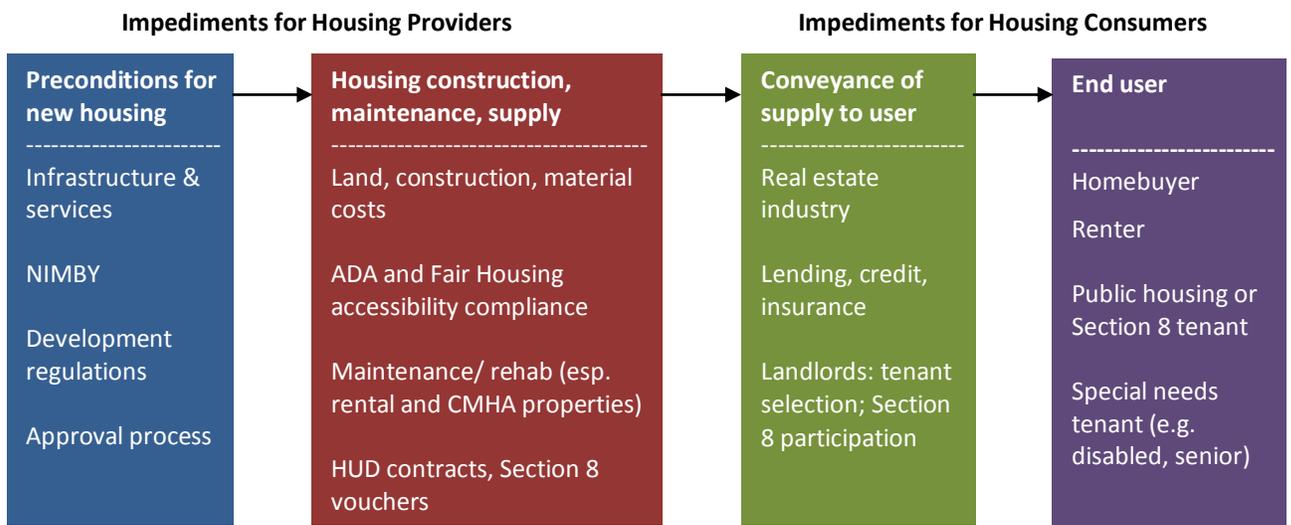
1.4 Fair Housing Plan Outline

As mentioned earlier, the Fair Housing Plan comprises an Analysis of Impediments to Fair Housing Choice (AI) and a Fair Housing Action Plan.

The AI includes the following sections:

- Section 2: The **Community Profile** includes detailed demographic, socioeconomic and housing market analysis, providing quantitative data to complement the discussion of impediments.
- Section 3: The **Fair Housing Legal Status** section outlines the federal, state and local laws on fair housing. This section also describes how local fair housing organizations assess discrimination charges, along with data on discrimination cases and results.
- Section 4: **Impediments to Housing Choice** discusses a wide range of public and private sector impediments to fair housing, including overarching themes that cut across both sectors. This sections follows the chronology of a housing “supply chain” (see Figure 1) covering impediments pertaining to how housing is maintained (existing) or built (new) and then conveyed via various aspects of the real estate industry (agents, lenders, appraisers, landlords) to homebuyers or tenants. These impediments affect the accessibility and/or affordability of housing for the end user.

Figure 1. Impediments supply chain framework



- Section 5: The Fair Housing Activities section outlines the programs and activities of various public and non-profit organizations active in Franklin County with regard to housing finance, development, sale, regulation, enforcement, policy, and advocacy.
- Section 6: The Recommendations and Conclusions summarizes the outcomes of the AI and connects observations that arose from the various sections.

The final section of this document is the Fair Housing Action Plan:

- Section 7: The **Action Plan** contains recommendations and timetables to address the impediments, outlining the responsibilities of CUL, the City of Columbus, and Franklin County as well as other key stakeholders.

1.5 Summary of Progress since 2001 Fair Housing Plan

Noted throughout Sections 4 and 5 of this document are various measures that the City of Columbus, Franklin County, the Columbus Urban League, and other stakeholders have taken to implement recommended actions from the 2001 Fair Housing Plan. However, there are also areas where implementation has been slower. Below is an outline of accomplishments and remaining challenges in addressing fair housing impediments identified in 2001.

Highlights of 2001 Plan Implementation and Other Progress

Actions by local stakeholders:

- City of Columbus agencies have implemented many of the Mayor's Housing Task Force Recommendations to help facilitate development of affordable housing. A One Stop Shop provides guidance the development of approval process.
- The City has produced a Traditional Neighborhood Development code to support more urban, pedestrian-friendly development.
- The City created a New American Initiative to address challenges faced by new immigrants, including fair housing.
- The Columbus Metropolitan Housing Authority has increasingly worked with the private sector (e.g. through Low Income Housing Tax Credits) to better leverage its limited resources.
- The Ohio Civil Rights Commission (OCRC), Coalition on Homelessness & Housing in Ohio, and other organizations have increased educational programs and technical assistance on fair housing accessibility for disabled persons.
- The Columbus Board of Realtors has expanded educational activities for its members regarding cultural awareness in response to the growing diversity of Columbus's population.
- Professional organizations such as the Columbus Apartment Association continue to provide education for people in the industry.

Actions at the state level where local stakeholders had a research and advocacy role:

- Ohio Senate Bill 185 took effect in 2006, providing a wide range of measures to counter predatory lending. A coalition of housing and other organizations played an important role in advocating for this legislation.

- Ohio House Bill 372 took effect in 2008, adding military status to the list of protected classes for housing.
- Ohio Department of Insurance amended its rule to prohibit insurance scoring from being the sole criterion for policy underwriting. OCRC produced research on home insurance, credit scoring, and disparate impacts on minority and low-income consumers.
- In 2003, the Ohio legislature dedicated permanent funding for the Ohio Housing Trust Fund.

Other progress:

- The proportion of loan applications by minorities has reached parity with their percentage of the population.

Areas in Need of Progress

- Franklin County has developed a scoring system for CDBG funding that awards extra points for municipalities with affordable housing strategies. However, development regulations in the suburbs remain exclusionary for the most part.
- NIMBY (“not in my backyard”) sentiments against affordable and special needs housing remain in many communities in both Columbus and the suburbs.
- Regional coordination on housing issues is generally lacking.
- Research and action are still needed on a number of housing discrimination issues, including the persistence of gaps along racial and ethnic lines with regard to loan decisions, subprime and foreclosure, credit and insurance.

2

Community Profile

This section describes the purpose of the study, how it was designed, the research methodology, and the format of the report.

- 2.1 Demographic Characteristics
- 2.2 Income Characteristics
- 2.3 Employment Profile
- 2.4 Areas of Low-Income and Racial Concentrations
- 2.5 Housing Profile

2.1 Demographic Characteristics

Over the last several decades, the City of Columbus has significantly expanded its boundaries through annexation. This expansion has created a “tale of two cities” within Columbus: one displaying the classic characteristics of an urban central city, the other witnessing significant population and economic growth. The contrast of these two cities within a city frames the way this Fair Housing Plan looks at impediment issues, using three primary geographic areas for much of its analysis (Map 1):

- The Columbus older city, defined by the city’s 1950 corporate boundaries;
- The Columbus newer city, made up of areas annexed since 1950; and
- The suburban county, the balance of Franklin County including all of the cities, villages and townships other than Columbus.

Population Trends

Columbus and Franklin County continue to gain population. The 2000 population of Columbus was 711,470, a 12.4% increase since 1990. Franklin County was the fastest growing urban county in Ohio between 1990 and 2000, with an 11.2% increase, for a total 2000 population of 1,068,978.

Data shows a change in the regional distribution of population growth. The period between 1970 and 2000 saw significant losses in population in the older city, dramatic gains in the newer city and moderate gains in the suburb and county. As the population of the older city declined by 105,467 (30.2%) persons during this period, the newer city population increased by 277,260 (145.6%), and the suburban county population increased by 63,936 (21.8%) persons.

Table 1. Population Trends, 1970-2000

	OLDER CITY	NEWER CITY (1)	SUBURBAN COUNTY	FRANKLIN COUNTY TOTAL
1970	349,299	190,378	293,572	833,249
1980	287,723	277,298	304,306	869,327
1990	267,950	364,960	329,167	962,077
2000	243,832	467,638	357,508	1,068,978

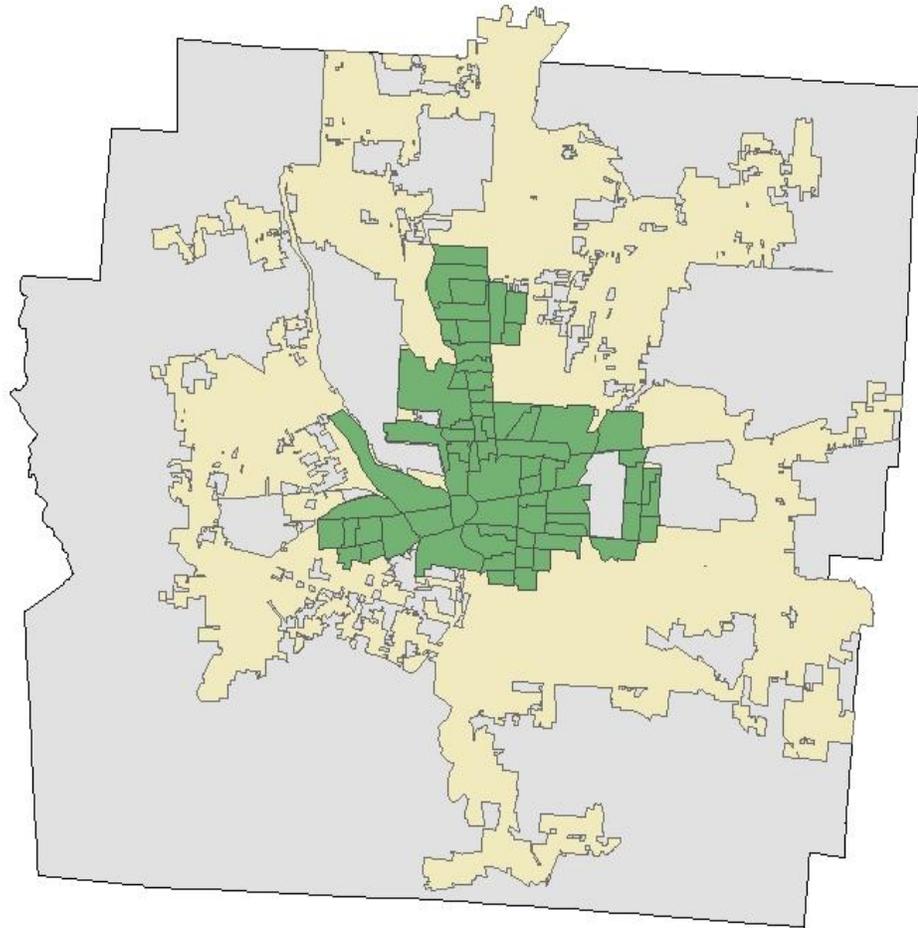
Source: Columbus and Franklin County, Ohio Consolidated Plan, 2005-2009

1) The boundaries of the Columbus “newer city” have changed during this period as a result of annexation. The 2000 newer city includes a larger geographic area than did the 1990 newer city.

Population and Household Characteristics

Household size in Columbus and Franklin County has steadily decreased since 1960. Census data shows that the average household size in Columbus declined from 2.38 in 1990 to 2.30 in 2000, and average household size in Franklin County declined from 2.47 in 1990 to 2.39 in 2000. As household size has decreased, the total number of households has increased. Between 1990 and 2000, the number of Franklin County households increased from 378,723 in 1990, to 438,778 in 2000, an increase of 15.9%.

Map 1. Older Columbus, Newer Columbus, and Suburban Franklin County, 2000



Legend

-  Columbus Boundary, 1950
-  Columbus Boundary, 2000
-  Franklin County

0 1 2 4 6 Miles



Map Prepared by Community Research Partners
December 12, 2007

Between 1990 and 2000, married-couple households increased by 3.1% in Columbus city and by 3.6% in Franklin County. During the same period, the number of female-headed households in Columbus city increased by 20.1%, and in Franklin County these households increased by 19.5%. The older city had a greater proportion of female-headed households with own children (10.7%) than either the newer city (8.6%) or suburban Franklin County (6.0%). The older city also had a much greater proportion of children under age 18 living in female-headed households (46.2%) than the newer city (26.4%) or the suburban county (14.7%).

Table 2. Population and Household Characteristics, 2000

	OLDER CITY	NEWER CITY	SUBURBAN COUNTY	COLUMBUS CITY	FRANKLIN COUNTY
Total population	243,832	467,638	357,508	711,470	1,068,978
Total households	102,689	198,845	137,244	301,534	438,778
Family households	48,862	116,518	98,221	165,380	263,601
Married-couple households as% of all households	26.1%	41.2%	58.4%	36.1%	43.0%
Single-person households as% of all households	38.2%	38.2%	23.7%	34.1%	30.9%
Female-headed households with own children as% of all households	10.7%	8.6%	6.0%	9.3%	8.3%
Children <18 in female-headed households as% of all households	46.2%	26.4%	14.7%	32.4%	25.7%
Persons age 60 and over	30,178	53,169	55,304	83,347	138,651
Percent of total population	12.3%	11.4%	15.5%	11.7%	13.0%
Percent of all persons age 25 and over without a high school diploma	23.6%	12.9%	10.4%	16.4%	14.3%

Source: U.S. Census Bureau

In 2000, the percentage of adults age 25 and older without a high school degree living in the older city (23.6%) was nearly double that of those living in the newer city (12.9%), and nearly two and a half times that of those living in the suburban county (10.4%). Additionally, only 26.1% of the adults in the older city had a bachelor's degree or above, compared with 37.1% of those living in the suburban county. Nearly one-third of all Franklin County residents had a bachelor's degree or higher (31.8%) in 2000, while only 29.0% of Columbus residents achieved the same level of education.

The aging of the population in central Ohio was not as pronounced as it was in other parts of the country. Between 1990 and 2000, dependent populations (persons under age 18 and persons age 65 and over) in Franklin County increased at a greater rate than those age 18-64 (Table 3). In Columbus during the same time period, the number of persons age 65 and over increased the least (8.8%), while persons under age 18 increased at nearly double that rate (14.5%).

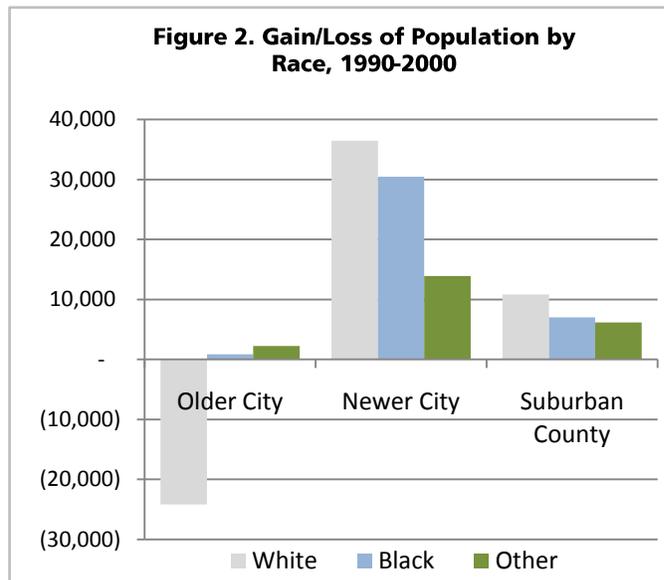
Table 3. Population Age Characteristics, 1990-2000

	FRANKLIN COUNTY		COLUMBUS	
	NUMBER	% CHANGE 1990-2000	NUMBER	% CHANGE 1990-2000
Persons under age 18	268,321	13.3%	171,868	14.5%
Persons age 18-64	696,351	10.2%	476,571	12.2%
Persons age 65 and over	104,306	12.6%	63,031	8.8%

Source: U.S. Census Bureau

Racial and Ethnic Composition

Census data from 1990 and 2000 illustrate the fact that Columbus and Franklin County are becoming increasingly racial and ethnically diverse, showing a disproportionate growth in minority populations during this time period (Table 4). In 2000, half of the



191,196 black residents of Franklin County lived in the newer city (48.8%) while 41.0% lived in the older city and 10.3% lived in the suburban county. Between 1990 and 2000, black residents living in the newer city grew by 48.8% and those living in the suburban county grew by 92.6%. The white population continued to shrink in the older city (-15.8%) while the vast majority of growth for all racial and ethnic groups was occurring in the newer city (27.1%).

Source: U.S. Census Bureau

There was significant growth in other racial and ethnic groups in Franklin County (Figure 2), and this growth has accelerated in recent years. The impetus for this growth stems from an emerging refugee and immigrant population composed primarily of individuals of Hispanic or Somali descent. Between 2000 and 2006, the overall Hispanic population in Franklin County increased from 24,279 to 38,357 (Census 2000, American Community Survey 2006). The county's foreign-born population born in Mexico increased from 6,110 to 13,665 during the same period. The foreign-born population born in Eastern Africa increased from 5,504 to 10,751.

Table 4. Racial composition of 2000 population and% change 1990-2000

	OLDER CITY	NEWER CITY	COLUMBUS CITY	SUBURBAN COUNTY	FRANKLIN COUNTY TOTAL
White	149,128	334,924	484,052	322,799	806,851
	-15.8%	+14.0%	-2.8%	+3.2%	+2.9%
Black	78,276	93,217	171,493	19,703	191,196
	-2.1%	+48.8%	+20.1%	+92.6%	+25.1%
Other	16,528	39,571	56,099	14,832	70,931
	+131.6%	+246.3%	+202.2%	+145.8%	+188.4%
Total	243,932	467,712	711,644	357,334	1,068,978
	-7.7%	+27.1%	+12.4%	+8.6%	+11.2%

Source: U.S. Census Bureau

Persons with Disabilities

Persons with Mental Illness and/or Substance Abuse

In 2007, 39,969 people were served by agencies funded by the Alcohol, Drug, and Mental Health Board of Franklin County (ADAMH). This includes 35,059 persons served in the mental health system and 11,686 served by the substance abuse treatment system (the sum of these figures exceed 39,969 due to double counting of people who seek both types of services). Of the persons receiving mental health services in 2007 from ADAMH system agencies, 10,106 were diagnosed as having a severe mental disability (SMD).

Physical Disabilities

The 2006 American Community Survey identified 144,605 persons with a self-identified disability in Franklin County. Of these, 28.3% are age 65 and over. Table 5 provides information on the nature of physical disabilities among Franklin County residents.

Table 5. Disability Status of Franklin County Residents, 2006

	PERSONS AGE 5-15 YEARS	PERSONS AGE 16-64 YEARS	PERSONS AGE 65 AND OVER	FRANKLIN COUNTY TOTAL
WITH A DISABILITY	12,227	91,409	40,969	144,605
Sensory disability	1,702	19,284	15,237	36,223
Physical disability	1,984	52,332	31,676	85,992
Mental disability	10,112	37,302	10,843	58,257
Self-care disability	2,540	14,977	9,149	26,666
DIFFICULTY GOING OUTSIDE HOME	NA	25,601	17,772	43,373
PREVENTED FROM WORKING	NA	51,778	NA	51,778

Source: U.S. Census Bureau; American Community Survey, 2006

Persons with Mental Retardation or Developmental Disabilities (MR/DD)

In 2006, the Franklin County Board of MR/DD provided services to 13,755 individuals through their vocational, habilitation, and supportive living services.

Persons with HIV/AIDS or Related Diseases

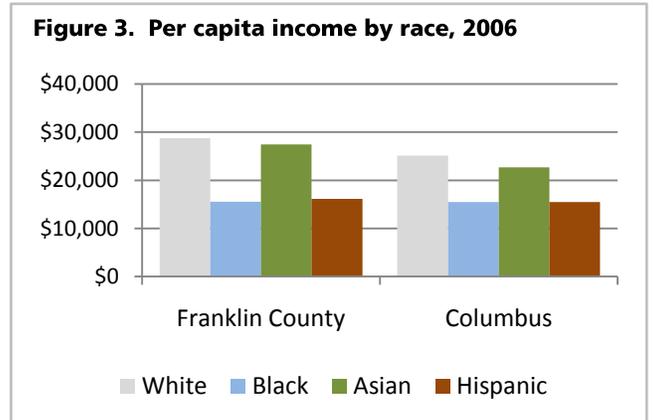
Data from the Ohio Department of Health indicates the rate of HIV/AIDS in Franklin County to be 247.0 per 100,000. As of December 31, 2005, 1,533 cases of HIV (not AIDS) and 1,107 cases of AIDS had been diagnosed in Franklin County. Nearly half of all AIDS cases (547) are the result of male-to-male sexual contact.

2.2 Income Characteristics

The Department of Housing and Urban Development (HUD) is required by law to set income limits to determine eligibility of applicants for its assisted housing programs. Section 3 of the U.S. Housing Act of 1937 provides the statutory basis for setting the income limit definitions. The 2006 HUD-established median family income for a family of four for the Columbus MSA was \$64,400. The HUD income limit groupings are:

- **Moderate-income** – incomes do not exceed 80% of the median - \$51,500
- **Low-income** – incomes do not exceed 50% of the median - \$32,200
- **Extremely low-income** - \$19,300

Data from the American Community Survey in 2006 indicated that one-third of all households in Franklin County (32.6%) met the HUD definition of low-income as did 37.9% of households in Columbus. Nearly one-fourth of all Columbus households (24.5%) and more than one in five Franklin County households (21.0%) met the HUD definition of extremely low-income while 20.4% of Columbus households and 27.4% of Franklin County households earned an income of \$75,000 or more.



Source: U.S. Census Bureau, American Community Survey, 2006

There is also a correlation between race and income levels. In 2006, the per capita income of black households in Franklin County and Columbus was approximately 54%-62% of the per capita income of whites (Figure 3).

Poverty

The poverty level for a family of four in 2006 was \$20,614. After decreasing between 1990 and 2000, the poverty rate in both Franklin County and Columbus increased between 2000 and 2006. The Columbus poverty rate in 2006 was 20.7%, the highest it has been in more than four decades. The Franklin County poverty rate decreased from

11.6% in 2000 to 16.3% in 2006. The total number of persons in poverty in 2006 grew to 144,832 in Columbus, and to 175,184 in Franklin County.

Poverty affects minority populations disproportionately in Franklin County and Columbus. The poverty rate for blacks (32.3%) was nearly three times that of whites (11.4%) in Franklin County in 2006. In Columbus, the poverty rate for blacks (33.1%) was more than double that of whites (15.0%). The Hispanic population was also disproportionately affected, with a poverty rate of 25.2% in Franklin County and a rate of 25.9% in Columbus (Table 6).

Poverty rates in Franklin County also varied by age and household type. More than a fifth of all children under the age of 18 were in poverty in Franklin County (21.6%), and in Columbus the rate swelled to more than one out of every four children (28.8%). People age 65 and over had the lowest poverty rates in both Franklin County (8.5%) and Columbus (10.8%).

Table 6. Poverty in Franklin County and Columbus, 2006

	FRANKLIN	COLUMBUS
Total Population	1,095,662	718,477
Total Population for whom poverty is determined	1,072,112	699,167
Total Below Poverty	175,184	144,832
Poverty Rate	16.3%	20.7%
White		
Total Below Poverty	89,408	67,416
Poverty Rate	11.4%	15.0%
Black		
Total Below Poverty	70,247	64,709
Poverty Rate	32.3%	33.1%
Asian		
Total Below Poverty	7,626	N/A
Poverty Rate	18.4%	N/A
Hispanic		
Total Below Poverty	9,440	7,423
Poverty Rate	25.2%	25.9%
Age Group		
Under 18	21.6%	28.8%
18-64 years	15.4%	19.0%
65 and over	8.5%	10.8%
Families		
All Families	11.3%	14.7%
Married-couples	4.2%	5.8%
With children	6.1%	8.8%
Female-headed Households	33.0%	35.3%
With Children	40.2%	43.2%

Source: U.S. Census Bureau; American Community Survey, 2006

The poverty rate for female-headed households (33.0%) was nearly three times that of all families living in Franklin County (11.3%), and more than four out of every ten female-headed households with children in Columbus were living below the poverty line.

Married-couple families had the lowest poverty rates in both Franklin County (4.2%) and in Columbus (5.8%).

2.3 Employment Profile

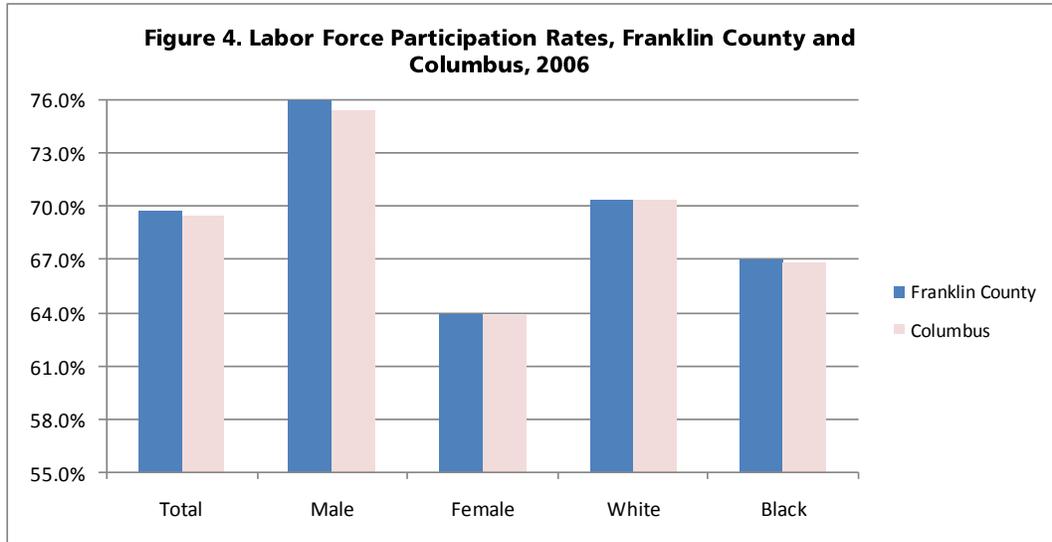
Columbus is the 15th largest city in the nation and the largest city in Ohio. State government, educational institutions and service firms that have traditionally been less vulnerable to cyclical economic swings dominate the Columbus area economy. While economic diversity has allowed Columbus to weather the economic downturn better than most cities of the nation's northeast quadrant, the foreclosure crisis and housing market slowdown has had an impact on the health of the city's overall economy.

Labor Force Characteristics

The expansion of the labor force in both Franklin County and Columbus slowed down during 2000 to 2006, compared to the growth that occurred from 1990 to 2000. In Franklin County, the civilian labor force was 588,834 persons in 2006, an increase of less than one% since 2000. In comparison, the county's civilian labor force grew from 523,163 persons to 583,723 persons between 1990 and 2000, an increase of 11.6%. Columbus witnessed its labor force shrink by 1.1% to 389,814 persons between 2000 and 2006, after an increase of 8.3% between 1990 and 2000.

The labor force participation rate is the percent of non-institutionalized civilians age 16 and over who are employed or seeking employment. During the period from 1990 to 2000, the Franklin County labor force participation rate increased from 70.1% to 70.6%, but decreased to 69.8% in 2006. In Columbus, the labor force participation rate increased from 69.7% to 71.0% between 1990 and 2000 but then decreased to 69.5% in 2006.

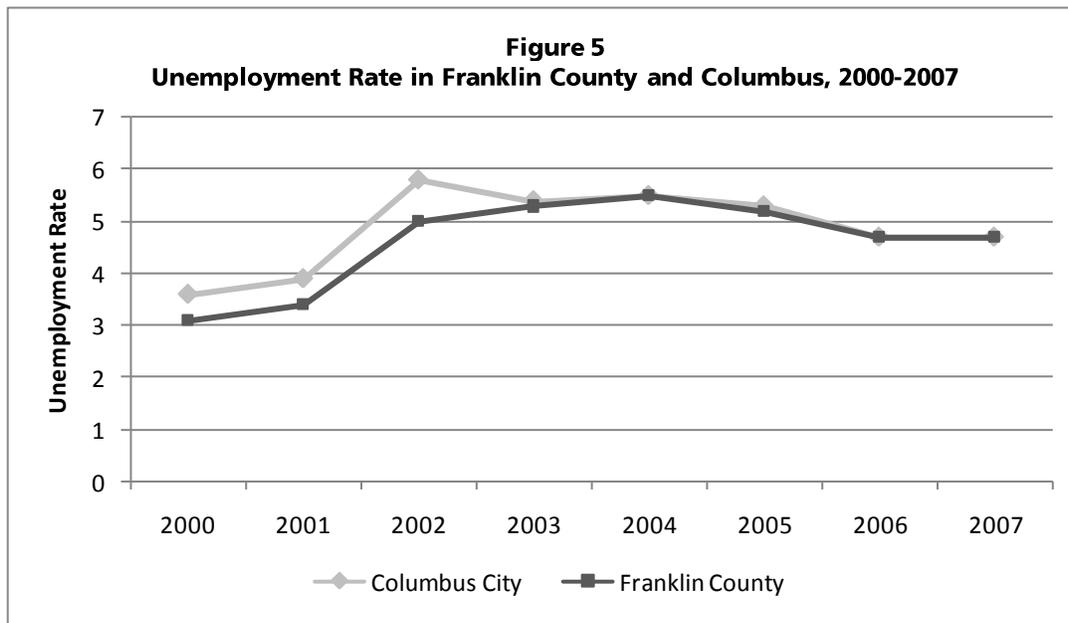
There has not been any significant change in labor force participation rates between males and females between 1990 and 2006. Female participation rates ranged from about 62% to 66%, while male participation rates ranged from about 75% to 78% during this time period. In Franklin County, the labor force participation rate for whites decreased from 71.6% in 2000 to 70.4% in 2006, while the rate for blacks increased from 66.5% to 67.1% during the same time period. In Columbus, this change was slightly greater with the participation for whites decreasing from 72.7% in 2000 to 70.4% in 2006 and the participation rate for blacks increasing from 66.1% to 66.9%.



Source: U.S. Census Bureau; American Community Survey, 2006

Unemployment

The unemployment rate in central Ohio has historically been the lowest in the state, and well below the national average. The average annual unemployment rate for Franklin County in 2000 was 3.1% and for Columbus was 3.6%, well below the state and national average of 4.0%. However in 2007, the unemployment rate for both Franklin County and Columbus climbed to 4.7%, which was slightly higher than the national average of 4.6% but still below the state average of 5.6%.



Source: Ohio Department of Job & Family Services, Labor Market Information

Employment Characteristics

The Ohio Department of Job and Family Services (ODJFS) data shows that between 2000 and 2007, the number of people employed in Franklin County grew from 575,500 to 589,900, an increase of 2.5%. Similarly in Columbus, the number employed grew from 385,100 to 397,900 during the same time period, an increase of 3.3%.

Jobs in the Columbus MSA are projected to grow by 10.9% between 2004 and 2014, according to the ODJFS Office of Workforce Development. These jobs are projected to come largely from the service industries, specifically from the professional and business services as well as from the education and health services industries. The goods-producing industries are projected to remain at the same level of employment with increases in construction offset by continuing decreases in manufacturing and agriculture.

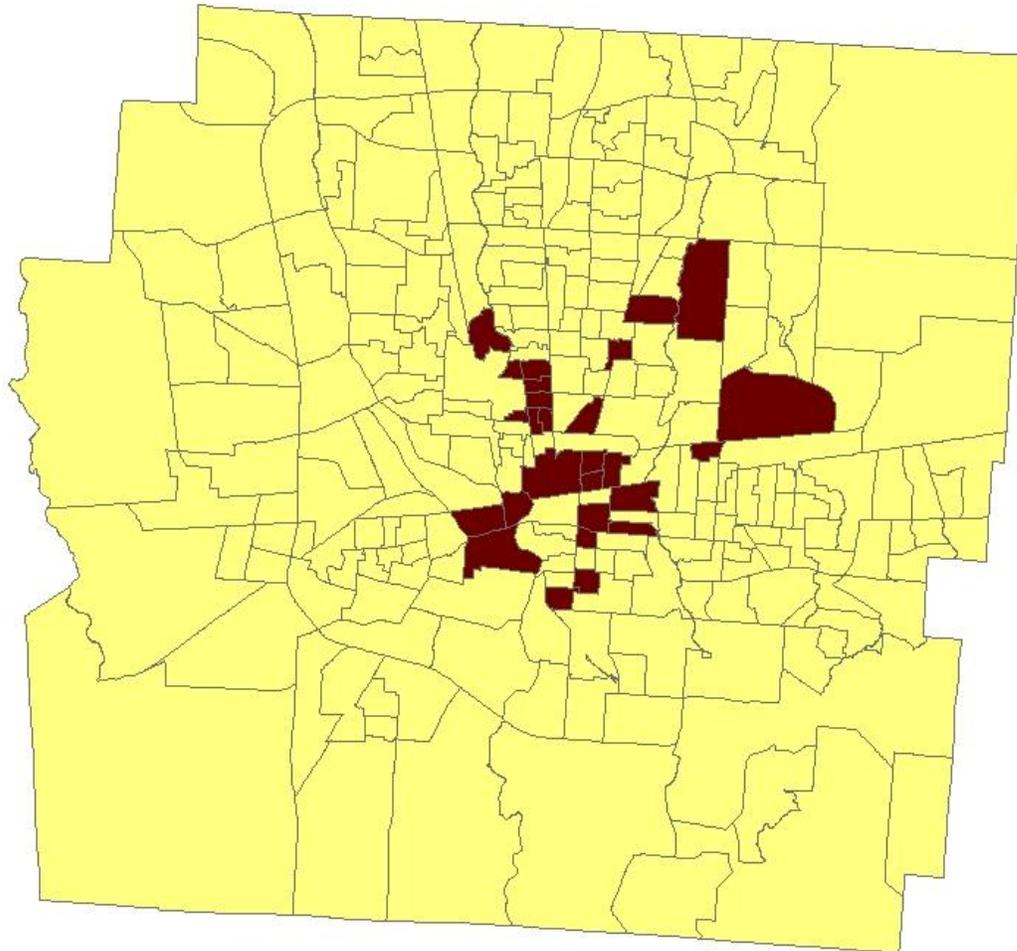
Four out of every five jobs in the Columbus MSA (776,070) were in service industries in 2004. The largest share of these jobs came from retail trade (108,850) with health care and social assistance a distant second with 88,750 jobs. Federal, state and local government combined for a total of 144,380 jobs in the region. Employment in the finance, insurance and real estate industry, traditionally a strong industry in Columbus, decreased from 77,500 persons in 1999 to 74,020 in 2004.

Economies that are dominated by service-oriented industries tend to be more recession-proof, but they also are more likely to create a higher percentage of low-paying jobs that offer fewer benefits for workers. ODJFS Office of Workforce Development reports show that in 2006 in Franklin County, the average weekly earnings for manufacturing workers was \$986 and for finance and insurance workers was \$1,174, while healthcare and social assistance workers made \$761 per week and workers in retail trade received just \$551 weekly.

2.4 Areas of Low-Income and Racial Concentrations

The Columbus Planning Division has divided the city into 30 planning areas, and the city council has adopted a total of 45 area and neighborhood plans. Areas of low-income concentration are defined as census tracts with poverty rates equal to or greater than 30%. Between 1990 and 2000, the number of census tracts with 30% or more of its population living below the poverty line has decreased from around 45 to less than 30. These tracts are all located within the I-270 outer belt, and are predominantly found in the older city area.

Map 2. Franklin County Areas of Low-Income Concentration, 2000

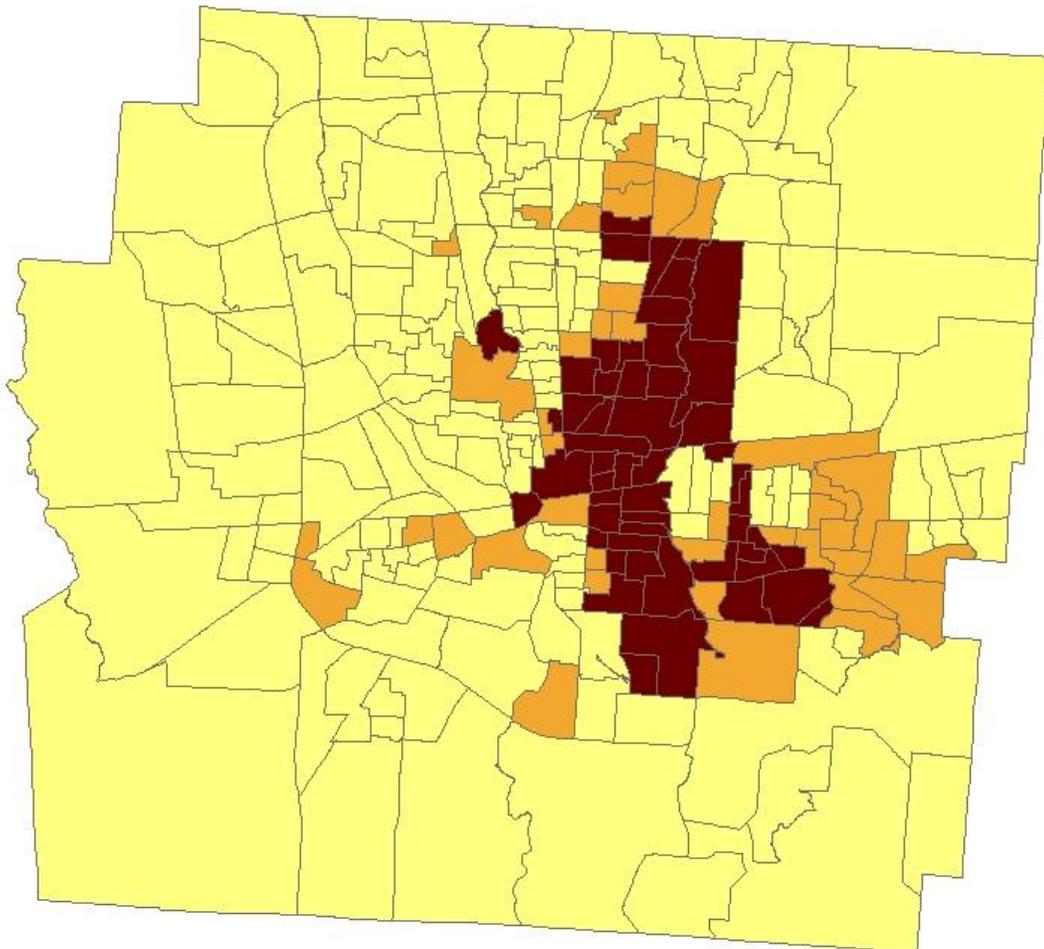


Percent in Poverty

-  Less than 30%
-  30% or greater



Map 3. Franklin County Areas of Minority Concentration, 2000



Percent of Minority Population

- 0%-25%
- 25%-50%
- 50% or more



2.5 Housing Profile

Data from the American Community Survey indicates that there were 518,821 housing units in Franklin County in 2006, a 10.1% increase since 2000. Of this total, 360,229 (69%) were in Columbus. Between 2000 and 2006, the total number of housing units in Columbus increased by 32,800.

Housing Tenure

There are substantial variations in owner occupancy rates within Franklin County between the suburban areas of the county and Columbus. In 2006, about half (49.5%) of the occupied housing units in the city were renter-occupied, while in the suburban area of the county more than three-fourths of occupied units were owner-occupied (76.4%). The owner-occupancy rate in suburban Franklin county increased from 73.9% in 2000 to 76.4% in 2006, while the owner-occupancy rate in Columbus increased from 49.1% in 2000 to just 50.5% in 2006. Overall, the homeownership rate for households in Franklin County was 58.8%.

Homeownership Rates by Race

There is a significant difference in homeownership rates in Columbus and Franklin County based on the race of the householder. Data from the American Community Survey for Franklin County (Table 7) indicates that 65.3% of white households were homeowners in 2006, compared to only 36.8% of black households. The disparity was greatest in suburban Franklin County where nearly four out of every five white and households were homeowners (79.0%) while only 37.1% of black households are homeowners. The homeownership rate for black households was fairly constant between the city and suburban areas of the county, while for other racial groups there was a large difference between the two areas.

Table 7. Homeownership Rates by Race, 2006

	COLUMBUS	SUBURBAN FRANKLIN COUNTY	TOTAL FRANKLIN COUNTY
White	56.6%	79.0%	65.3%
Black	36.7%	37.1%	36.8%
Asian	41.8%	62.3%	46.8%
Hispanic	35.6%	51.3%	39.3%

Source: American Community Survey, 2006

Housing Condition

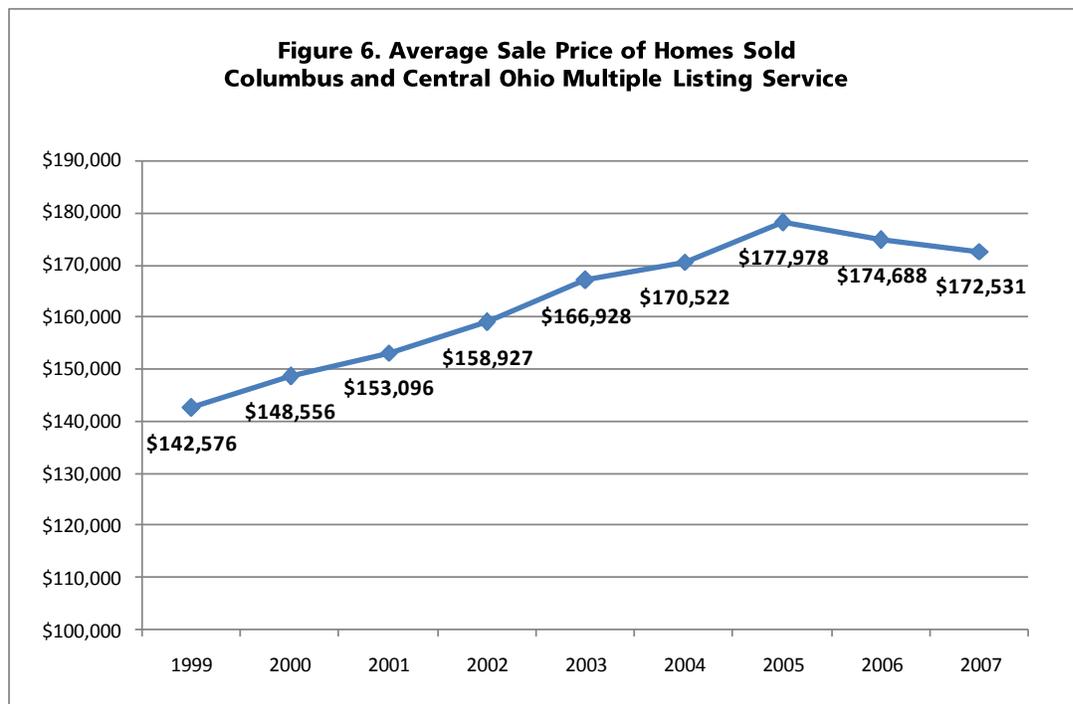
The 2002 American Housing Survey (AHS) for the Columbus Metropolitan Area is the most recent and detailed data on housing conditions in Franklin County. The AHS, conducted by the Census Bureau for HUD, uses sample surveys of occupants to develop its data tables.

The 2002 AHS data shows there were 21,300 housing units in Franklin County with physical condition problems. More than one-fourth of these units (28.2%) had severe physical problems and 73.3% were renter units. In Columbus, there were 17,800 housing units with physical problems, accounting for 83.6% of the Franklin County total. More than four out of every five housing units (80.9%) with physical problems in Columbus were renter units. In the suburban county area there were 3,500 housing units with physical problems, of which nearly two-thirds (65.7%) were owner units and more than half had severe physical problems (54.3%).

Cost is a major obstacle to rehabilitation for housing units with severe physical problems. In Columbus there were 1,100 owner units and 3,000 renter units with severe physical problems, for an estimated total of 4,100 units that are unsuitable for rehabilitation. An additional 13,700 units with moderate physical problems may be in need of rehabilitation. In the suburban county area there were 1,900 units with severe physical problems that were unsuitable for rehabilitation and an additional 1,600 units with moderate physical problems. Cost of rehabilitation that exceeds the expected after-rehab property value and structural defects pose barriers to rehabilitation of substandard properties in the suburban county area.

Owner Housing Market

In 2007, the average sale price for homes was \$172,531 in Central Ohio, down from a peak of \$177,978 in 2005. This price was still 21% higher than the average in 1999 (Figure 6).



Source: Columbus Board of Realtors, Multiple Listing Service Statistics (Central Ohio statistics)

The National Home Builders Association compiles the Housing Opportunity Index, a quarterly measure of the percentage of new and existing homes sold that a family earning

the median income can afford to buy. In the Columbus MSA, 77.7% of all homes sold were affordable to a median income household, up from 68.7% in 2000 (Q3). Out of the 220 metro areas in the index, Columbus ranked 40th nationwide for its housing affordability (Table 8).

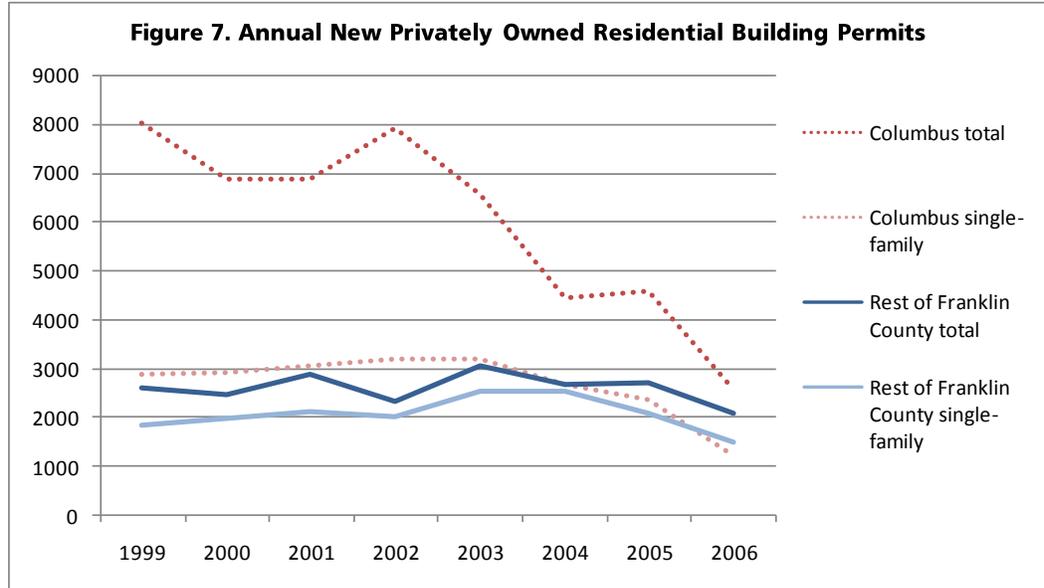
Table 8. National Housing Opportunity Index, Fourth Quarter 2007

MSA	% OF HOMES SOLD AFFORDABLE TO MEDIAN INCOME HOUSEHOLDS	2007 MEDIAN FAMILY INCOME	2007 Q4 MEDIAN SALES PRICE	NATIONAL AFFORDABILITY RANK (OF 220 TOTAL MSAS)
Columbus	77.7%	\$64,200	\$132,000	40
Cleveland	81.7%	\$60,700	\$104,000	26
Cincinnati	76.8%	\$63,600	\$131,000	44
Kokomo, IN	92.9%	\$59,700	\$91,000	1
Napa, CA	4.9%	\$75,800	\$540,000	220
National	46.6%	\$59,000	\$227,400	NA

Source: National Association of Home Builders, Housing Opportunity Index

In spite of the overall affordability of housing in the Columbus metro area, the American Community Survey shows that 28.2% of Franklin County homeowners spent at least 30% of their household income on housing in 2006. For owners with a mortgage, this rate was even higher at 31.7%.

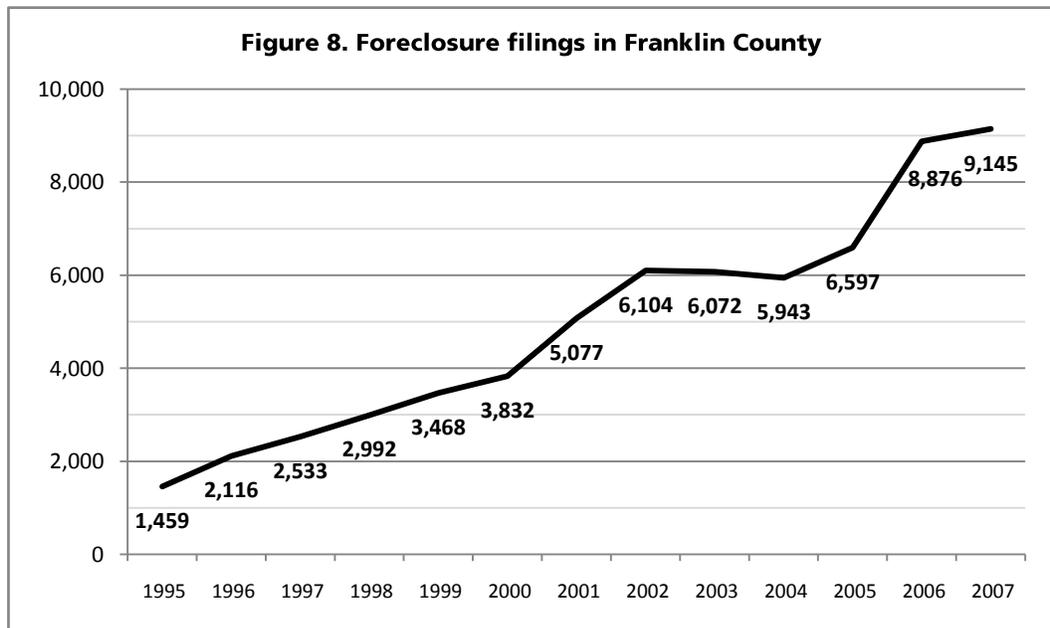
The number of housing units permitted in Columbus and Franklin County fell from 7,912 and 10,243 respectively in 2002 to 2,568 and 4,639 in 2006 (Figure 7), a trend that began a couple years ahead of the downturn in housing prices. The city generally has a much higher proportion of multi-family projects than the rest of Franklin County, reflecting the difference in development regulations between Columbus and suburban municipalities. From 1999 to 2006, the percentage of housing permits in Columbus that was for single-family homes was 45%, compared to 80% in the rest of Franklin County.



Source: U.S. Census Bureau, Manufacturing, Mining, and Construction Statistics

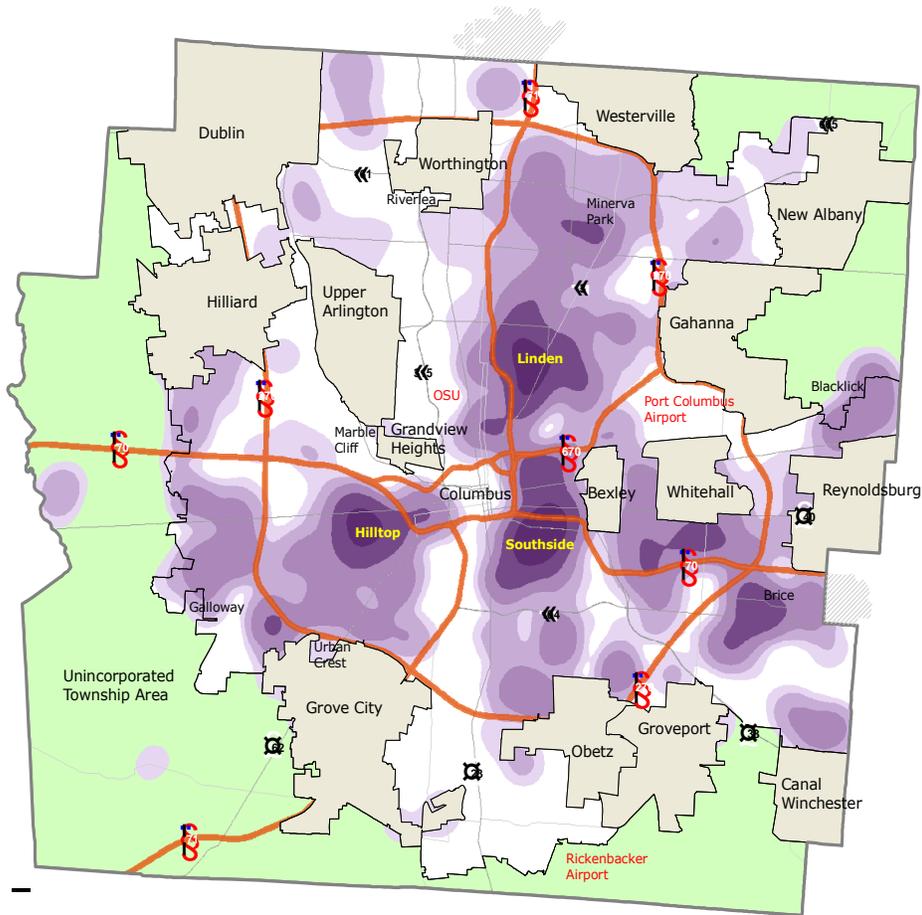
Foreclosures

Even as housing prices rose during the late 1990s and the early 2000s, foreclosures were a growing problem (Figure 8), quadrupling between 1995 and 2002 from 1,459 to 6,104. As the market has begun to decline more recently, the number of foreclosure filings has spiked higher, rising by 35% between 2005 and 2006 alone. Map 4 (next page) shows the density of foreclosure filings, with concentrations in neighborhoods such as Hilltop, Linden, and Southside. All three neighborhoods have concentrations of low-income and minority populations (Maps 2 and 3).



Source: The Daily Reporter

Map 4. Franklin County Density of Foreclosure Filings, January 2007-March 2008



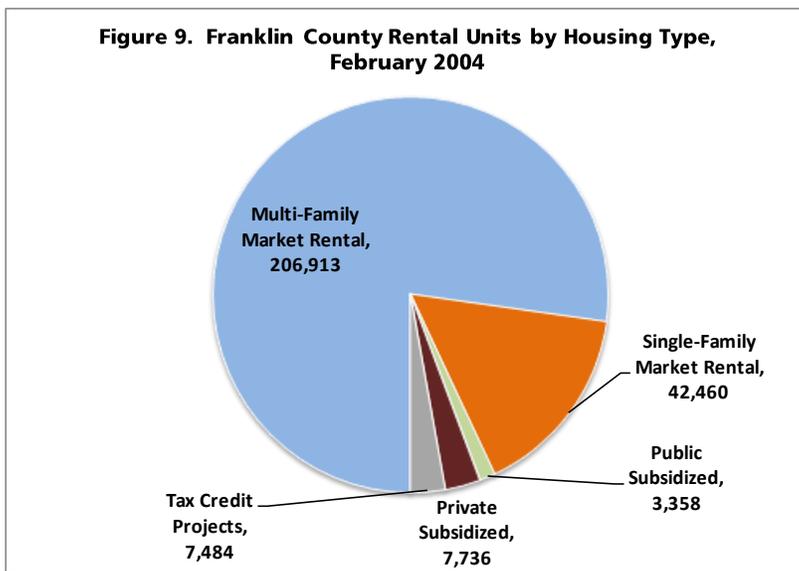
per square mile

- Fewer than 10
- 10 - 20
- 20 - 40
- 40 - 80
- 80 - 159
- 160 or more



Rental Housing Market

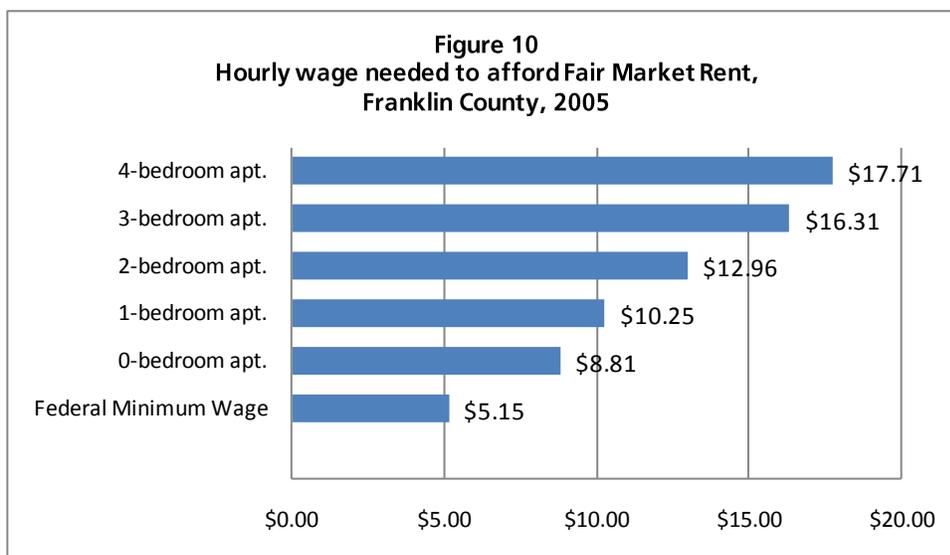
An affordable housing market analysis conducted by The Danter Company and Community Research Partners in 2004 identified 267,951 rental units in Franklin County. Market-rate units comprised 77% of the rental units in the county, while subsidized units represented only 4.1%. Tax credit units were 2.8% of the rental market (Figure 9).



Source: The Danter Company

Of the market-rate units, 90.5% had either one or two bedrooms while only 6.7% have three or more bedrooms. In the tax credit properties 27.2% of the units had three or more bedrooms. Between 2000 and 2003 there were 49 larger multi-family rental projects (10 units or more) constructed, with a total of 8,813 units. In 2004, an additional 1,636 units were under construction in new and existing market-rate properties. The vacancy rate for market-rate units among these larger developments was high, at 9.2% while the rate for tax credit units was 5.9%.

According to the National Low Income Housing Coalition, the wages needed to afford Fair Market Rent for even a one-bedroom or studio apartment in Franklin County exceeded both the federal and Ohio minimum wage in 2005 (Figure 10).

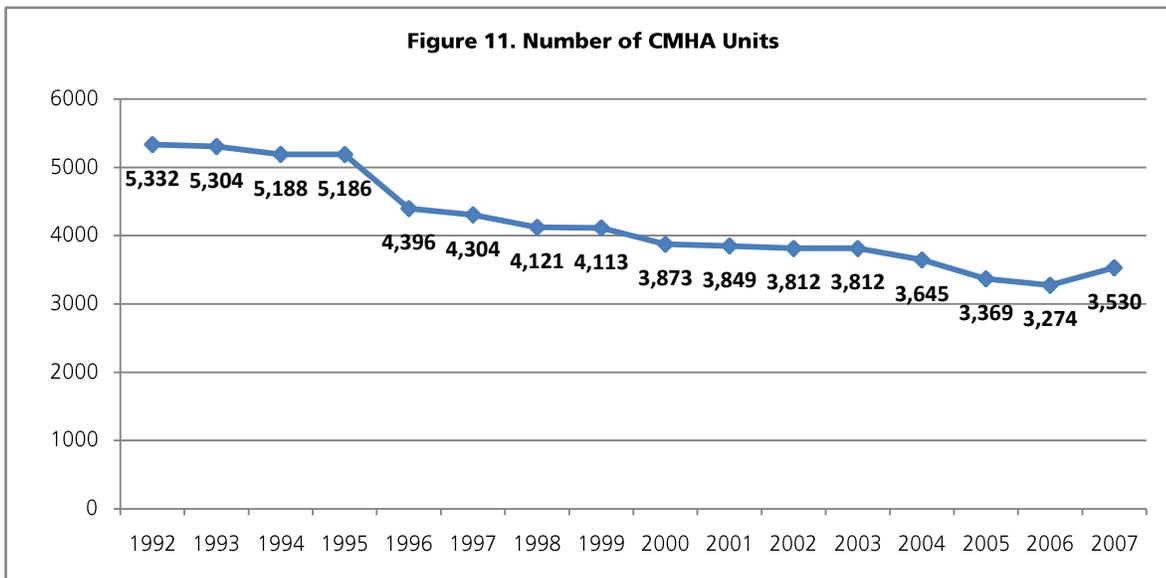


Source: National Low Income Housing Coalition, *Out of Reach 2006: America's Growing Wage-Rent Disparity*

Public Housing & Section 8 Tenant-Based Vouchers

Since the 2001 Fair Housing Plan, the Columbus Metropolitan Housing Authority (CMHA) has seen a continuance of the long-term trends in the declining number of public housing units and an increasing reliance on vouchers. As of December 2007, the number of units stood at 3,530, a 9% drop from the end of 2000 (Figure 11). During roughly the same period, the number of vouchers rose from 7,303 in November 2000 to 10,840 in December 2007. This increase has occurred even as CMHA has phased out Section 8 certificates, now solely using vouchers. The grant renewal for Shelter plus Care adds another 536 projected vouchers.

In March 2008, the vacancy rate among CMHA units was at 3.1% (out of 3,456 units). Studios, 2-bedroom, and 3-bedroom apartments had the lowest rates at 1.2%, 1.7%, and 2.3% respectively.



Source: Columbus Metropolitan Housing Authority

Project-Based Section 8, 236, BMIR and Other HUD Financed Units

In addition to public housing, there are many privately owned affordable housing projects that receive federal subsidies through contracts between owners and HUD or have rent restrictions as a result of HUD financing. The HUD Multifamily Assistance and Section 8 Contracts Database, previously the Section 8 Expiring Contracts Database, shows 9,469 privately owned Section 8 units in Franklin County as of November 2007 (Table 9). Of these, 4,328 have expiration dates between late 2007 and end of 2011. CMHA, the Ohio Housing Finance Agency and HUD each administer a portion of the project-based Section 8 contracts in Franklin County. Owners of project-based Section 8 units charge a HUD-approved rent, and receive a subsidy, which makes up the difference between 30% of tenant income and the contract rent.

Table 9. HUD Section 8 and Multifamily Assistance in Franklin County, 2008

PROGRAM TYPE	ASSISTED UNIT COUNT
Sections 202 (elderly) & 162 - New Construction	23
Sections 202 & 8 - New Construction	1,182
Housing Finance Development Authority -Section 8 - New Construction	375
Housing Finance Development Authority -Section 8 - Substantial Rehabilitation	513
Loan Management Set Aside	3,593
Property Disposition – Section 8 - Substantial Rehabilitation	352
Project Rental Assistance Contract – Section 202	912
Project Rental Assistance Contract – Section 811 (disabled)	217
Rent Supplement	13
Section 8 - New Construction	1,214
Section 8 - Substantial Rehabilitation	1,075
TOTAL	9,469

3

Fair Housing Legal Status

This section describes the legal framework surrounding the issue of fair housing in Columbus and Franklin County.

- 3.1 Fair Housing Law
- 3.2 HUD Secretary Charges/Findings of Discrimination
- 3.3 Fair Housing Discrimination Suits
- 3.4 Discrimination Complaints

3.1 Fair Housing Law

Fair housing law governing Columbus and Franklin County includes legislation at the federal, state and local levels.

Federal Law

The Civil Rights Act of 1968 prohibits discrimination in housing on the basis of race, color, religion, sex, and national origin or ancestry. Title VIII of the Civil Rights Act of 1968 is devoted to housing and is commonly referred to as the Fair Housing Act. The Fair Housing Amendments Act of 1988 added handicapped and familial status to the list of protected classes. The 1988 Act also enhanced enforcement powers by increasing monetary penalties, allowing more time to file discrimination complaints, and establishing a formal administrative process at HUD to investigate complaints. In 1990, the Americans with Disabilities Act further expanded requirements to accommodate persons with disabilities in housing.

The Civil Rights Division of the U.S. Department of Justice, and the Office of Fair Housing and Equal Opportunity (FHEO) and the Office of Administrative Law Judges of HUD, all have responsibilities to enforce federal statutes prohibiting discrimination. In addition, local jurisdictions are required to certify compliance with federal anti-discrimination law as a requirement for receiving federal funds. As a result, federal agencies may withhold funding or impose other program-related sanctions if a community has been found to engage in discriminatory practices.

While the Fair Housing Act does not preempt local zoning laws, it prohibits local government entities from exercising their zoning or land use powers in a discriminatory way.

State Law

In 1965, Ohio became one of the first states to enact fair housing legislation. In 1992 House Bill 321 made changes in the classes of persons protected by the Ohio Fair Housing Law and significantly enhanced the enforcement powers of the Ohio Civil Rights Commission. As a result, Ohio fair housing law was determined to have “substantial equivalency” with federal law, and can be enforced in lieu of federal law in Ohio.

The law gives all persons in the protected classes the right to live wherever they can afford to buy a home or rent an apartment. Section 4112.02 (H) of the Ohio Revised Code states that it is unlawful, on the basis of race, color, religion, sex, national origin or ancestry, disability or familial status to:

- Refuse to rent, sell, transfer or finance housing accommodations;
- Represent to any person that housing accommodations are not available for inspection, sale, rental or lease, when in fact they are;
- Refuse to lend money for the purchase, construction, repair, rehabilitation or maintenance of housing accommodations or residential property because a person is in a protected class or because of the racial composition of the neighborhood in which the housing is located;
- Discriminate against any person in the purchase, renewal or terms and conditions of fire, extended coverage or homeowner’s or renter’s insurance;

- Refuse to consider without prejudice the combined income of both spouses;
- Discriminate against any person in the selling, brokering or appraising of real property;
- Print, publish or circulate any statement or advertisement that would indicate a preference or limitation;
- Include in transfer, rental or lease documents any restrictive covenant;
- Induce or solicit housing listing, sale or transaction, or discourage the purchase of housing, by representing that a change has occurred or may occur in a neighborhood with respect to its racial, religious, sexual, familial status or ethnic composition;
- Deny any person membership in any multiple listing service or real estate broker's organization;
- Refuse to permit, at the expense of the person with a disability, reasonable modifications of existing housing, to enable the resident full enjoyment of the housing;
- Refuse to make reasonable accommodations in rules, policies, practices or services where necessary to afford a person with a disability equal opportunity to enjoy a dwelling unit and associated common use areas; and
- Fail to design and construct covered multifamily dwellings with accessibility provisions outlined in state law.

Effective March 24, 2008, Ohio House Bill 372 added military status to the list of protected classes under the state's Fair Housing Law. This amendment is designed to address complaints that military personnel were experiencing housing discrimination because they were on active duty or based on their type of discharge.

Columbus City Code

Section 2331.02 of the Columbus City Code makes a fair housing violation a first-degree misdemeanor. The prohibitions of the city code are almost identical to state law, but the city code includes sexual orientation as a protected class. A first-degree misdemeanor carries a maximum fine of \$1,000 and six months in jail.

Franklin County

For housing, Franklin County follows the 2006 Residential Code of Ohio and therefore contains similar prohibitions.

3.2 Federal Charges or Findings of Discrimination

A review of case lists on the HUD and Department of Justice websites reveals that there have been no fair housing complaints or compliance reviews where agencies of either department has issued a charge of or made a finding of discrimination against the City of Columbus or Franklin County¹.

3.3 Fair Housing Discrimination Suits

A review of Internet sources, including *Columbus Dispatch* archives and the web site of the U.S. Department of Justice, found no active fair housing discrimination suits in Columbus and Franklin County. Staff of the Columbus Urban League, the lead fair housing agency for the City of Columbus and Franklin County, also indicated that they are not aware of any discrimination suits in either jurisdiction.

3.4 Discrimination Complaints

Discrimination complaints provide an indication of the nature and degree of fair housing problems in a jurisdiction. The two agencies with the primary responsibility for handling fair housing discrimination complaints in Columbus and Franklin County are the Columbus Urban League (CUL) and the Ohio Civil Rights Commission (OCRC). People with fair housing discrimination complaints occasionally contact other community organizations, including the Columbus Legal Aid Society and Columbus Community Relations Commission; however, they are generally referred to the CUL or OCRC.

Both the City of Columbus and Franklin County use CDBG funds to contract with the Columbus Urban League to provide fair housing services. Included in these services is “housing discrimination redress”. An individual who believes he or she is a victim of housing discrimination can file a complaint with CUL’s Housing Department. CUL typically handles a case in one of the following ways:

- **Mediation** – Used for relatively simple cases where a client simply wishes to get into a housing unit and is not looking for monetary damages.

¹HUD Fair Housing Enforcement Activity, <http://www.hud.gov/offices/fheo/enforcement/hudcharges.cfm>
USDOJ, Civil Rights Division, Housing and Civil Enforcement Section, <http://www.usdoj.gov/crt/housing/fairhousing/caseslist.htm>
HUD Administrative Law Judges <http://www.hud.gov/offices/oalj/cases/fha/aljalpha.cfm>

- **Sent to Attorney**– Used for cases where CUL believes that the client has a very strong case and there has been a blatant act of discrimination. In some of these cases, CUL has done testing that supports the client’s allegation. When a client is referred to an attorney, CUL covers the attorney’s out-of-pocket expenses.
- **Referred to OCRC**– Used for cases where further investigation is needed. This is the most frequent method used by CUL.

Analysis of data from CUL indicates that disability is the most common basis for filing housing charges, followed by race and familial status. In the 2001 Fair Housing Plan, data showed that CUL handled 50 cases during 1998-2000. This number has risen to 122 in the most recent 3-year period. Disability cases alone increased by 75 cases and therefore explain the growth in the overall number of cases.

Table 10. Columbus Urban League Housing Discrimination Cases

	2005	2006	2007
Number of Housing Charges Filed	38	27	57
Basis for Filing			
Religion	0	0	0
Disability	30	18	34
Race	6	3	10
Age	0	0	0
Gender	0	0	3
National Origin	1	3	3
Familial Status	1	3	7
Retaliation	0	0	0

Source: Columbus Urban League, Annual Fair Housing Reports, 2005-2007.

4

Impediments to Fair Housing

This section describes the impediments to fair housing in Columbus and Franklin County.

4.1 Overview of fair housing impediments

4.2 Impediments for housing providers

- Infrastructure and Services
- NIMBY
- Development Regulations, Fees, Zoning Requirements
- Public Housing and Section 8 Units
- Compliance with Fair Housing Accessibility and ADA Requirements

4.3 Impediments for housing consumers

- Real Estate Industry
- Lending
- Credit and Insurance
- Rental Housing
- Tenant Participation in Public Housing and Section 8

4.1 Overview of Fair Housing Impediments

Housing and fair housing choice can be impacted in a variety of ways, both directly and indirectly. This section explores the broad categories of impediments to fair housing, and examines the public and private sector activities that have the greatest impact on fair housing choice in Columbus and Franklin County. After a discussion of overarching themes, the specific topics are arranged in the manner of a “supply chain” to show how housing discrimination plays a role from the construction or maintenance of housing stock to the home-buying or renting end user.

According to the Urban Institute publication *Mortgage Lending Discrimination: A Review of Existing Evidence* (Turner and Skidmore, 1999), there are two forms of housing discrimination that at times can be difficult to distinguish.

- **Differential treatment**—equally qualified individuals are treated differently due to their race or ethnicity or the characteristics of the neighborhood in which a house is located.
- **Disparate impact**—a policy or decision criterion disqualifies a larger share of minorities than whites. It may appear to be color blind in the way it treats different applicants, but cannot be justified as a business necessity.

Interestingly, this distinction became noticeable in the research process for this plan. Many of the focus groups and interviews dealt with overall market conditions that highlighted disparate impacts, where the foreclosures and credit tightening have had a disproportionate effect on minority and low-income households. Secondary research of existing literature and data, however, indicates that differential treatment may still be a factor.

Overarching Themes

Several broad categories of impediments have emerged, but are manifested in a variety of ways within the different agencies and industries that comprise the public and private sectors. Market conditions, education and outreach, and the growing immigrant population were themes that arose repeatedly in several different contexts. These overarching themes are discussed in a general fashion here with more specific details later where these themes intersect with issues such as NIMBY, development regulations, the real estate industry, lending, and public housing.

Housing Market Conditions

In nearly all the focus groups and interviews, the downturn in home sales, the rising number of foreclosures, and the fallout of the subprime lending market were inevitable topics of discussion. These issues varied in how they impacted different aspects of housing. The weak housing market has reduced development pressures, making NIMBY (“not in my backyard”) sentiments and land use regulations less of a focus, even though these issues clearly remain and will resurface as hot topics when the market improves. Foreclosures and the subprime fallout have impacted minority and low-income households, affecting homeowners struggling to keep up with mortgage payments and aspiring homebuyers seeking financing.

Anecdotal observations about the disparate impacts of foreclosure are supported by data, which show concentrations in Columbus and especially within its poorer neighborhoods (see Map 4 in Section 2). From January 2007 to March 2008, there were 10,076 foreclosure filings in Franklin County, of which over three-quarters (7,592) were in Columbus. The older part of Columbus (1950 boundaries) comprised 29% of all filings in the county, beyond its proportion of county households (23% based on Census 2000).

Education and Outreach

In 2005, HUD conducted a survey of fair housing awareness to revisit the issues raised in a 2001 survey. The new survey still reveals large gaps of public awareness on discrimination against different types of protected classes. Part of the survey presents a range of hypothetical scenarios to which respondents have to determine whether or not discrimination has occurred. Familial status and disabilities, which are the more recent additions to the Fair Housing Act, were the subjects that were most difficult for the public to correctly identify as discrimination (see Table 11).

Table 11. Percent of survey respondents answering correctly on housing discrimination scenarios, U.S., 2000/1 and 2005

SCENARIO	Percent Giving Correct Answer	
	2000/1	2005
Differential treatment of families with children	38%	44%
Limiting real estate search to white-only areas	54%	58%
Opposing construction of wheelchair ramp	56%	54%
Disapproval of rental to persons with mental illness	57%	60%
Advertising "Christians preferred"	67%	62%
Requiring a higher down payment based on ethnicity	73%	70%
Disapproval of rental to persons of a different religion	78%	77%
Restricting home sales to white buyers	81%	81%
Number of Respondents	1,001	1,029

Source: HUD (Feb. 2006) "Do We Know More Now?"

Interviews with the Ohio Civil Rights Commission, the Coalition on Homelessness and Housing in Ohio (COHHIO), and other organizations revealed that local advocates recognize this awareness gap, especially regarding disabilities, and are acting to address it through education and technical assistance. The Ohio Civil Rights Commission (OCRC) noted additional training for both in-house staff and in its outreach programs.

In focus group discussions and interviews, the need for education and outreach was highlighted for almost every type of impediment:

- Financial literacy among homebuyers
- Community opposition to affordable housing by the public and officials
- Awareness of fair housing requirements among small landlords
- Cultural awareness among industry practitioners about immigrant populations
- Outreach to hard-to-reach immigrant populations

Immigrants

As of 2006, Franklin County had a foreign-born population of 88,284 people, with 37,202 (42.1%) having entered the U.S. since 2000. After Minneapolis, Columbus has the second-highest Somali population in the U.S. with some estimates as high as 30,000. The Columbus area also has a growing Hispanic population, as well as Russians and Vietnamese among a variety of other groups.

The City of Columbus established the New American Initiative to better address the needs of new immigrants. This initiative recognizes housing as a key challenge for immigrants, especially in the following three areas:

- Reports of fair housing violations are higher in areas where there are high concentrations of immigrants and refugees.
- Most immigrant families arriving in the city are large compared to American households. As it is not uncommon for an African or a Hispanic family to have as many as eight members in the household, they have greater challenges in finding appropriately sized housing.
- Alternative affordable housing solutions are necessary in response to cultural needs. For example, Islamic law, or *sharia*, prohibits *riba* – the collection and payment of interest. Therefore, the conventional mortgage is not a feasible option in this case.

Language and cultural barriers represent a challenge for the housing industry in serving the immigrant population. Public and non-profit agencies experience similar issues in working with program participants and reaching out to potential new participants.

Housing is an acute problem for illegal immigrants, as they cannot access government programs and instead can face abuses in the private housing market. Illegal status limits public housing opportunities, as demonstrated by the fact that the Columbus Metropolitan Housing Authority interacts more with Somalis, many of whom have legal refugee status, than with Hispanics. In the private market, the actual or perceived conflation of immigration and housing laws and enforcement often prevents illegal immigrants from filing complaints about housing discrimination.

4.2 Impediments for Housing Providers

Infrastructure and Services

Infrastructure and services are the backbone for development, including affordable housing. Development professionals note the higher costs of land with water and sewer already in place. Furthermore, as annexation has extended the city and its services outwards, older parts of the city have a significant backlog of infrastructure maintenance and improvements. Redevelopment and infill opportunities are sometimes hindered by the limitations of aging water and sewer infrastructure, especially when the development proposed is at a higher intensity than the original capacity. Within the Columbus school district, the real or perceived quality of education is a deterrent for families who, even with financial constraints, continue to seek housing in a suburban school district. The

need for better infrastructure and services in Columbus, especially in the older part of the city, impacts the affordability and quality of housing for low-income and minority households.

NIMBY (“not in my backyard”)

Due to current market conditions and the decline in development pressures, NIMBY and development regulations were not as significant a topic as in focus groups for the 2001 Fair Housing Plan. However, this issue still remains and will arise again when market conditions improve. Moving affordable housing developments through the regulatory process remains a difficult endeavor as public sentiment continues to coalesce around the perceived consequences of having certain types of developments in their neighborhood. In an effort to maintain or improve their own property values, communities prefer developments that “raise the bar” by increasing surrounding property values.

Suburban municipalities

As in 2001, the Columbus Metropolitan Housing Authority (CMHA) still experiences challenges in dispersing public housing and Section 8 into the suburbs, with continued but slow dispersion towards and outside the I-270 outer belt. Suburban communities engage in exclusionary practices which regulate new construction on the basis of lot size and floor area. Inclusionary zoning practices that place set-aside requirements for affordable housing for each new development constructed in a community have been slow to be embraced in central Ohio.

Education is needed among public officials, planning bodies, and the general public, particularly in suburban communities, to help clarify the meaning of affordable housing and eliminate the negative connotation that it brings. For instance, in many cases, key workers such as teachers, firefighters, and other public servants must commute long distances each day because they cannot afford to live in or near the communities they work in. As fuel prices rise, these communities may experience more difficulty in retaining this workforce.

Currently, the focus of most communities in central Ohio has shifted toward how best to deal with the fallout of the foreclosure crisis and the stagnation of the housing market in general. This issue is seen to have a greater and more immediate potential impact on property values and community character. In neighborhoods with high concentrations of foreclosure activity and vacancy rates, it becomes more difficult to make the argument for not wanting a potentially successful development in the area.

While public participation has brought invaluable benefit to the planning process, it also comes with its share of challenges. Increased public outcry impacts the politics of planning and development, and causes decision-makers to shy away from supporting even those developments that have demonstrated potential positive impacts on a neighborhood.

Furthermore, land costs in the suburbs require high densities to make a project financially feasible, which would only further raise community opposition. This problem requires innovative solutions such as public-private partnerships with developers and cobbling together alternative funding sources such as Low-Income Housing Tax Credits.

Area Commissions in Columbus

In Columbus, area commissions are usually involved in the development approval process. Columbus City Code (Section 3109) defines an area commission as an advisory body that cannot invalidate City Council actions and operates within the context of the City's approval process. However, as the City seeks to ensure neighborhood input in decisions, area commissions appear to wield greater influence than outlined in the code. Developers in the private, non-profit, and public sectors noted varying experiences with area commissions. Some commissions are flexible and take a partnership approach to projects, while others review proposals with great scrutiny. The latter case reveals a significant gray area on the application of land use and zoning powers.

Providing accurate information to the public is a critical component of gaining community acceptance. In many cases, perceptions about how a project might impact a neighborhood create an initial negative impression that can be difficult to overcome, even in light of new information. In this regard, the Columbus Apartment Association (CAA) has worked to develop relationships and explore alternatives in an effort to bridge the gap between neighborhood associations, city agencies and rental property owners. In some cases, the developer may be the party to reach out to neighborhood residents and area commissions in order to build support for their project. Where there is opposition against higher density multi-family projects, the developer can facilitate public support by providing information about a project's costs and benefits to the community, and engaging the public and city agencies in an open discussion.

Good Neighbor Agreements

Good Neighbor Agreements are an important method of gaining acceptance of a development project that otherwise might be unable to overcome NIMBY opposition in the community. These types of agreements can be used as "a tool that practitioners and developers of affordable housing or housing for the homeless can use to address the concerns [of the community] and ameliorate opposition."² Franklin County requests Good Neighbor Agreements as part of its HOME application process to help ensure project success, as was the case for HOME projects in Southpoint and Westerville.

Cooperation Agreements

The Columbus Metropolitan Housing Authority (CMHA) notes that there is greater neighborhood opposition to family units than to senior units. The public also has a negative perception of public housing and Section 8. These factors have pushed CMHA to use Cooperation Agreements that address the potential impacts of their developments.

As in 2001, CMHA currently has Cooperation Agreements with the Cities of Columbus, Hilliard, and Whitehall. The agreements with the latter two municipalities are limited to senior housing. CMHA noted that the projects that led to these agreements have not shown any significant negative impacts in the area. However, the practice of using Cooperation Agreements has not spread beyond these municipalities, limiting housing choice for CMHA beneficiaries.

² *Good Neighbor Agreement Between the Commons at Grant and the Neighborhood Advisory Committee, 2003*; <http://www.knowledgetplex.org/showdoc.html?id=11758>

Development Regulations, Fees, Zoning Requirements

Suburban Development Regulations

Regulating how we want our communities to look and function plays an important part in maintaining the character of the distinct and vibrant towns and neighborhoods in Franklin County. This kind of regulation is typically accomplished through zoning requirements and design guidelines for development. However, many suburban communities in Franklin County take this form of regulation to a high degree of control, amounting to exclusionary zoning practices that limit the development of affordable housing.

Regulations vary by community from minimum lot size and dwelling area requirements to design guidelines that dictate even the types of materials that may be used to construct the unit. Many suburban municipalities have relatively large lot size and unit size requirements for single-family homes, even in their least restrictive single-family residential zones (Table 12).

Table 12. Single-family zoning standards in Franklin County municipalities

JURISDICTION	LEAST RESTRICTIVE SINGLE-FAMILY RESIDENTIAL ZONES	MINIMUM LOT SIZE	MINIMUM UNIT SIZE
Columbus	R-2	5,000	720
Canal Winchester	R-3	14,375	1,500*
Dublin	R-3, R-4	10,000	Not specified
Gahanna	SF-3	11,000	1,400*
Grove City	R-2	8,400	1,200*
Hilliard	R-3	10,000	1,200*
Reynoldsburg	AR-1a, AR-2a, R-4a	8,400	1,200
Westerville	R-2	8,000	Not specified
Whitehall	R-4	7,200	1,000*
Worthington	R-6.5, AR-4.5, AR-3	8,750	Not specified

Source: CRP review of municipal zoning codes

*Note: Minimum size is for one-story homes.

For multi-family housing, many municipalities have zones that allow for much higher residential densities (Table 13), but the highest density zones tend to be limited in their land area and at times situated on land constrained by environmental features (e.g. wetlands), adjacent industrial zones, access issues, or difficult configuration. Most suburban municipalities have other conditions in these zones that add to the cost of development. For instance, parking requirements of two or more spaces per unit make it difficult to provide for studios and one-bedroom units.

The developer must pass the costs of complying with these requirements on to the purchase or rental price of the housing unit. The end result of these zoning practices is the exclusion of a large percentage of the population from being able to afford to live in

these communities. Regulations and design requirements have remained unchanged in most Franklin County municipalities since the 2001 Fair Housing Plan.

Even without the costs associated with exclusionary zoning practices, developing affordable housing units is becoming harder in central Ohio. Builders indicate the growing difficulty of finding developable parcels as open space in Franklin County diminishes. As a result, greenfield development is becoming more expensive as the cost of raw developable land continues to increase throughout the area.

Table 13. Maximum Residential Densities Permitted

JURISDICTION	MOST DENSE RESIDENTIAL ZONE	MAXIMUM DENSITY (DU/AC)	NOTES
Columbus*			
Canal Winchester	TND option	12	
Dublin	Urban Residential	12.1	
Gahanna	AR	12	
Grove City	A-2	21.8	6-unit maximum per building; recreation development fee
Hilliard	R-6	10.9	Impact fee, public use fee
Reynoldsburg	AR-3	18.2	
Westerville	R-4	7.9 (12.1 w/density bonus)	2.25 parking spaces per unit
Whitehall	A-2	20	
Worthington	AR-3	14.5	Maximum lot coverage of 20%

Source: CRP review of municipal zoning codes

*The City of Columbus does not have a defined maximum density, as the densest projects tend to be specially negotiated, taking into account planning criteria such as infrastructure capacity and neighborhood context.

Infill development in and around the central city offers an alternative to expensive greenfield land to provide affordable housing options to residents. Neighborhoods with a high proportion of vacant and abandoned property often have low property and initial investment costs and minimal design guideline regulation. However this savings is typically offset by the need to upgrade aging infrastructure and development fees. Public-private partnerships designed to address the difficulties associated with infill development are critical to facilitating affordable housing in the inner city.

Columbus Development Regulations

Compared to suburban municipalities, the City of Columbus was generally viewed by developers and other housing professionals as much more conducive to affordable housing development. The City not only has small minimum lot and unit size requirements for single-family housing, but also more areas for multi-family residential and mixed uses.

The City has made significant strides in the delivery of planning and development services. Following upon the recommendations of the Columbus Housing Task Force, the City streamlined and unified various elements of the development approval process (see Table 14). The City has also introduced a Traditional Neighborhood Development

(TND) code that allows for more urban, pedestrian-friendly development and reduces requirements such as right-of-way widths. Currently, the City is looking at making parking requirements more flexible to better reflect the existing neighborhood context.

The Columbus Development Guide, created in 2003, illustrates how an applicant would go through different approval processes, including approximate timetables, relevant agencies and contact information, and issues for consideration. The City has also created a One Stop Shop to facilitate the review process. Digital Submission Standards, introduced in 2006, clarify what is required of applications and saves City staff time by using electronic submissions that are more easily reproducible and distributable than paper.

Table 14. City of Columbus Implementation of Mayor’s Housing Task Force Recommendations

HOUSING TASK FORCE RECOMMENDATION	ACTION TAKEN?	DESCRIPTION OF IMPLEMENTATION OR REASON FOR NON-IMPLEMENTATION
Increase the spacing between streetlights.	N	Increasing spacing would diffuse the light and make it more difficult for people to see. This would run contrary to the City’s desire to promote safety. In the future, the development of brighter lights may allow for increased spacing.
Change waterline specifications from ductile iron pipe to the newly developed C-909 PVC pipe.	Y	The City has allowed for the use of C-909 PVC pipes but this has sometimes resulted in negative experiences, especially in the northern portion of its distribution system. The plastic has broken with severe damage to the line, because it does not have any give as iron does. There will be additional review on plastic pipes.
Reduce street width from 26’ to 22’ where one-side parking restrictions will assure access to water mains.	Y	Zoning codes are less one-size-fits-all, and more applicable to urban environments. Street widths in TND and PUD were reduced to 22’ with the parking being restricted on the side of the street where the fire hydrants are located.
Reduce right-of-way from “collector” to “local” classification (60’ reduced to 50’).	N	Collectors are an important intermediate category between local and arterial streets. Areas without collector streets (e.g. Clintonville) have to resort to solutions less than optimal to calm local streets that are heavily used because of the lack of collectors.
Change street specifications to a “performance” or asphalt base from concrete.	Y	The City has worked with industry organizations to develop a performance-based system and allow for a range of pavement design options, such as full-depth asphalt, composite pavements (asphalt top on a concrete base), all concrete pavements and the addition of a new type of full-depth concrete pavement called roller-compacted concrete (RCC).
Increase maximum distance between sanitary sewerage manholes from 300’ to 400’.	Y	The City is moving towards a 400-foot standard.
Invoice inspection costs monthly instead of requiring a deposit.	N	This would have added to administrative costs for the City and, in turn, to the cost of development. Auditor’s Office may also have issues with this kind of payment schedule.
Eliminate the one-year sanitary punch list.	N	
Reduce the left-hand turn lane requirement.	N	This requirement is set by state (Ohio Manual of Uniform Traffic Control Devices) and other industry standard publications.

Public Housing and Section 8 Units

Decline in Public Housing Stock

Since the 2001 Fair Housing Plan, the Columbus Metropolitan Housing Authority (CMHA) has seen a continuance of the long-term trends in the declining number of public housing units and an increasing reliance on vouchers. As of December 2007, the number of units stood at 3,530, a 9% drop from the end of 2000. While the pace of inventory reduction has slowed from the 27% decline from 1993 to 2000, the continued shift reflects the decrease in federal funds. According to HUD, public housing authorities across the nation will need \$20 billion to bring their properties to standard. HUD estimates that CMHA is operating at 82% of the funding it needs.

CMHA explored alternatives to reduce spending, including whether contractors could improve, maintain, and manage CMHA properties more efficiently. In negotiations of a contract for Sawyer Towers, a senior housing complex, National Church Residences (NCR) proposed a contract amount that far exceeded the revenue. This kind of financial reality leaves few options for older deteriorating stock, leading to demolition and replacement of the units via a combination of vouchers and smaller scale or mixed income developments. Even as CMHA has recently constructed a number of projects for elderly residents, the demolition of larger high-rises has shifted the balance of family versus senior units from 55% family units and 45% senior units to 66% family units and 34% senior units.

CMHA has proposals to demolish 1,668 units from 2009 to 2013, nearly halving the current supply. The agency plans to provide vouchers to make up for the lost stock. CMHA also proposes to dispose of 302 units through public sale and provision of tenant-based Section vouchers or conversion to project-based Section 8.

Landlord Participation in Section 8

CMHA works with 3,200 Section 8 landlords, of which it estimates 50% to be small landlords with only one or two units. According to the Columbus Apartment Association (CAA), a significant barrier for participation in Section 8 among small landlords is the difficulty of compliance with HUD standards, which originate from the federal level. CMHA noted that HUD requires 100% compliance, where a project can fail inspection for one minor failure, even if it does not affect the safety of the unit. CMHA acknowledged that this is a challenge for landlords and an impediment for Section 8 participation. However, to move away from 100% compliance would require setting a more discretionary and potentially arbitrary line between what passes and what fails. According to CMHA, most other inspection authorities do not fully enforce city building codes, adding to the perception that HUD requirements are more difficult. Although CMHA is enforcing existing codes that apply to everyone, the requirement of 100% compliance reduces potential housing choice for Section 8 voucher holders.

HUD-Financed Units

The HUD Multifamily Assistance and Section 8 Contracts Database, previously the Section 8 Expiring Contracts Database, shows 9,469 privately owned Section 8 units in Franklin County as of November 2007. Of these, 4,328 have expiration dates between late 2007 and end of 2011. While many of these contracts will likely be renewed, the number of privately owned Section 8 units has declined over time (down from 11,423 in

1999) and may continue with the upcoming expirations. This trend further reduces housing options for lower income households.

Compliance with Fair Housing Accessibility and ADA Requirements

In its definition of disability discrimination, the Fair Housing Act includes the refusal to make reasonable accommodations in rules, policies, practices, or services for a disabled person to use a dwelling. Furthermore, Title III of the Americans with Disabilities Act requires that public and common use areas at housing developments are accessible. These two laws thereby cover accessibility both within and to the dwelling unit. As noted above, discrimination issues related to disabilities are among the least recognized of the list of the protected classes.

Modifications to Existing Structures

One of the main sources of contention between housing providers and advocates is the definition of “reasonable accommodation” where the level of consensus depends on the scenario. For example, while most people would agree that a blind person should be allowed to keep a seeing-eye dog, opinions can vary on the health and emotional value of a pet in improving the quality of life of a disabled person. Some may view the latter example as means for a tenant to override a pet restriction clause, especially if it is a more exotic animal. In 2004, the Department of Housing and Urban Development and the Department of Justice released a joint statement³ to define “reasonable accommodations.” While this statement helps to some degree, there remains much space for varying interpretations on a case by case basis. The Columbus Apartment Association (CAA) noted that inspectors do use discretion to recognize extenuating circumstances, but are not always consistent in how they apply that discretion.

Modification of existing housing for ADA compliance represents a key point of disagreement because of varying views on what is reasonable. Interviewees on the property management side of the issue noted the difficulty of making modifications to existing properties, especially older stock where such modifications can impact supporting walls or have to be made within tight spaces. CAA believes that many landlords are fearful of ADA regulations. In particular, they want to be able to provide homes for disabled residents where feasible, but do not want to be taken advantage of. CAA noted that accessibility issues have become a greater focus in qualifying for Section 8 and tax credit programs. For public housing tenants who become disabled, CMHA accommodates them to the greatest extent possible by first trying to modify the unit in which the tenant currently lives. If this option is not feasible, CMHA will seek an alternative unit among its housing stock. The remedy of last resort is to provide a Section 8 voucher.

Compliance for New Structures

Compared to modifications, there is not as much contention over new developments. CAA has observed instances where thresholds appear to be too high, though greater

³ *Joint Statement of the Department of Housing and Urban Development and the Department of Justice: Reasonable accommodations under the Fair Housing Act (May 17, 2004)*
<http://www.fairhousing.com/index.cfm?method=page.display&pageid=3607>

consensus seems to have developed over time, as CAA have not heard many complaints from its members regarding citations on ADA compliance. On the public housing side, CMHA consults with the Legal Aid Society and other organizations to ensure that it is working in compliance with ADA and providing reasonable accommodation. In new developments, CMHA sets aside the requisite proportion of units for disabled persons. Based on the nature of demand, however, such units may be occupied by a non-disabled person, with the lease structured so that the tenant moves to other unit when a disabled person needs the unit.

For new construction, some housing advocates and architects promote universal design and access, where the need for modifications is minimal or unnecessary if tenancy changes between a disabled and non-disabled resident. In this framework, design features such as wider doorways and a lack of steps benefit all users. A common everyday example of this, though not originally intended for a universal design purpose, is the automatic doors in supermarkets that benefit not only disabled customers but all other customers who have carts or several shopping bags. Similar to green building, there is debate as to how much universal design adds to the cost of construction. Advocates say that the extra cost is minimal if universal design is incorporated into the plan from the start, while others note that certain amenities, such as kitchen appliances that are adjustable in height, inevitably cost extra money. Franklin County encourages the use of universal design in a number of its housing programs.

4.3 Impediments for Housing Consumers

Real Estate Industry

According to focus groups of Realtors and Realtists (an association comprising black Realtors in Columbus), there is still discrimination in the form of differential treatment in real estate and in related sectors such as banking and insurance. The nature of discrimination is changing, as reflected by the influx of new immigrants and the broadening list of protected classes. The aforementioned HUD survey on fair housing awareness shows that many people are still unsure when discrimination occurs. This is in part due to discrimination that is often subtler than what previous generations faced where now, for example, race or religion may not be directly mentioned but inferred through certain lifestyles or objects.

The professional networks within the real estate industry represent an area where there can be a fine line between good, legitimate business practices versus discrimination and steering. Realtors in particular are accustomed to working with their networks of lenders, appraisers, insurers, and others in the industry. Focus group participants stated that these networks were valuable in moving deals along and closing. However, customers may feel that they are being steered to use certain providers, as such networks have also been prone to fraud and discrimination. Therefore, Realtors have to be careful in making recommendations. Training and seminars, along with experience, help in understanding what the boundaries of good practice are in such situations. The Columbus Board of Realtors (CBR) has an Equal Opportunity Committee and an Affordable Housing Committee to provide information and guidance to Realtors.

The growing diversity of real estate clients and customers is another area where Realtors have had to learn quickly to make sure that they do not act in a discriminatory manner, real or perceived. Realtors are wary of their unfamiliarity with the customs and cultural norms and expectations of different immigrant groups. CBR is addressing this concern by holding cultural activities and awareness seminars on different immigrant groups so that members are better prepared to work with this growing population. Nevertheless, focus group participants felt that more education was needed. A small but growing presence of immigrants within the various sectors of the real estate industry has helped in serving the new population. However, word-of-mouth advertising has been the primary means by which many new immigrants navigate through real estate services. Regardless of the race or ethnicity of a real estate broker, lender, or property manager, word travels quickly about who treats immigrants fairly and who is not helpful.

As with other focus groups, Realtors and Realtists discussed housing market conditions of the fallout from subprime lending and foreclosures. These issues and the extent to which they have impacted minorities and low-income households are discussed in detail in the Lending section (page 4-15). Realtors noted that in the midst of all the negativity around the market, some positive trends have occurred. While there is room for improvement, the media coverage around foreclosures and subprime loans has raised public awareness of housing finance. The weak market has reduced instances of discrimination by sellers, who are now driven by financial necessity more than any discriminatory biases. The tightening of credit is a hurdle for buyers, but this is to some extent countered by a buyers' market, relatively low interest rates, and sellers who are willing to take creative actions such as paying for closing costs or arranging lease-purchase options.

Education and Outreach

Realtists felt that people with lower incomes tend to be payment-conscious but not rate-conscious. This observation corresponds with the recent popularity of adjustable rate mortgages and other loan types that provided, at least initially, low monthly payments but overall was not a sound financial deal. The Realtor focus group believed that the lack of financial literacy, while a more serious issue for lower-income households, extended towards the upper classes. Even among people who are financially successful, there are gaps in their knowledge when it comes to mortgage financing.

For many aspiring homebuyers, the American dream of homeownership sometimes overrides more pragmatic considerations. Realtors and Realtists noted the difficulty for potential buyers to realize when they are not ready to take on a mortgage. In cases where a Realtor recommends education and counseling to a buyer, some customers view this as a rejection and move on to seek someone else who will work with them. Focus group participants noted the odd juxtaposition that while a mortgage is the largest expenditure and investment in their lives, most people do not give it the level of consideration necessary.

In the context of government programs, recommendations for financial literacy education are already being applied. The City of Columbus and Franklin County has homebuyer certification requirements in place for their down payment assistance programs. However, the majority of homebuyers are using financing outside such programs, .

Focus groups suggested mandatory financial education at the high school level and in the home-buying process. In spite of the resources that would be required, the current

situation with subprime loans and foreclosures reveals that there could be significant benefits.

Internet

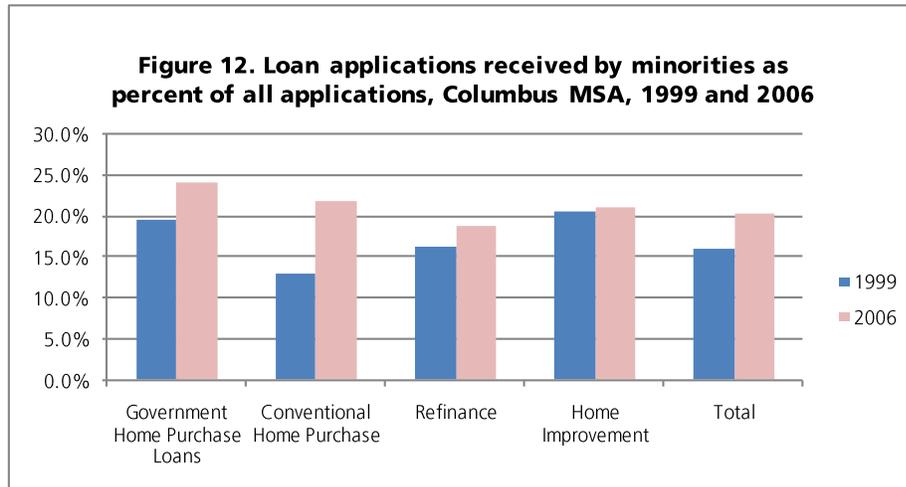
The Internet has had positive and negative impacts for understanding the housing market and financial literacy. Overall, the Internet has made immediately accessible a wide array of information for the general public. For instance, several web sites offer free or cheap credit reports. Lenders believe that many consumers who conducted Internet research are more financially literate. The concept of a digital divide unfortunately applies in the field of housing and finance information. People who do not have Internet access are at an even greater disadvantage as more information moves to the web and having Internet becomes the expected norm.

Despite the benefits of the Internet, there is also significant misinformation. Many consumers struggle with information overload. Focus groups were critical of Internet lenders and mortgage brokers, who have less accountability or stake in the quality of a loan. Professional advice is therefore valuable in filtering through all that the Internet has to offer.

Lending

Advertising and Outreach

The 2001 Fair Housing Plan noted various local efforts, including the Minority Homeownership Expo, to reach out to minority populations and increase the number of loan applications. The 1999 data provided in this plan showed that minority borrowers were particularly under-represented for conventional loans and refinancing in the Columbus metropolitan area. In this regard, the latest available data shows significant changes. Through some combination of outreach initiatives by local housing organizations and lending institutions and the expansion of the loan market, the percentage of minority applicants increased across different types of housing loans. Among the two weak areas noted in 2001, conventional loans saw minority applications rise from 12.9% in 1999 to 21.8% in 2006 and refinancing experienced an increase from 16.3% to 18.9% in the same period. In general, minority representation among housing loan applications are now at parity with the percentage of minorities in the metro area population (Figure 12).



Source: HMDA Aggregate Reports. The above percentages apply only to data for which race data is available, not the total number of loans in the Columbus MSA.

Loan Approval and Denial

While minority groups' share of applications may have reached parity, data on how lenders decide on those applications reveals that discrepancies still persist (Table 15). In 2006, denial rates for blacks ranged from 9.2 percentage points higher than white for government home purchase loans to 22.4 percentage points higher for home improvement loans. Overall, the 2006 data represents mixed results compared to 1999, where some gaps have narrowed and some have widened. The most troublesome trend has been in the denial rates for conventional home purchase loans, where the gap has increased from 9.3 percentage points (25.1% for blacks versus 15.8% for whites) in 1999 to 16 points (29.1% for blacks, 13.1% for white) in 2006.

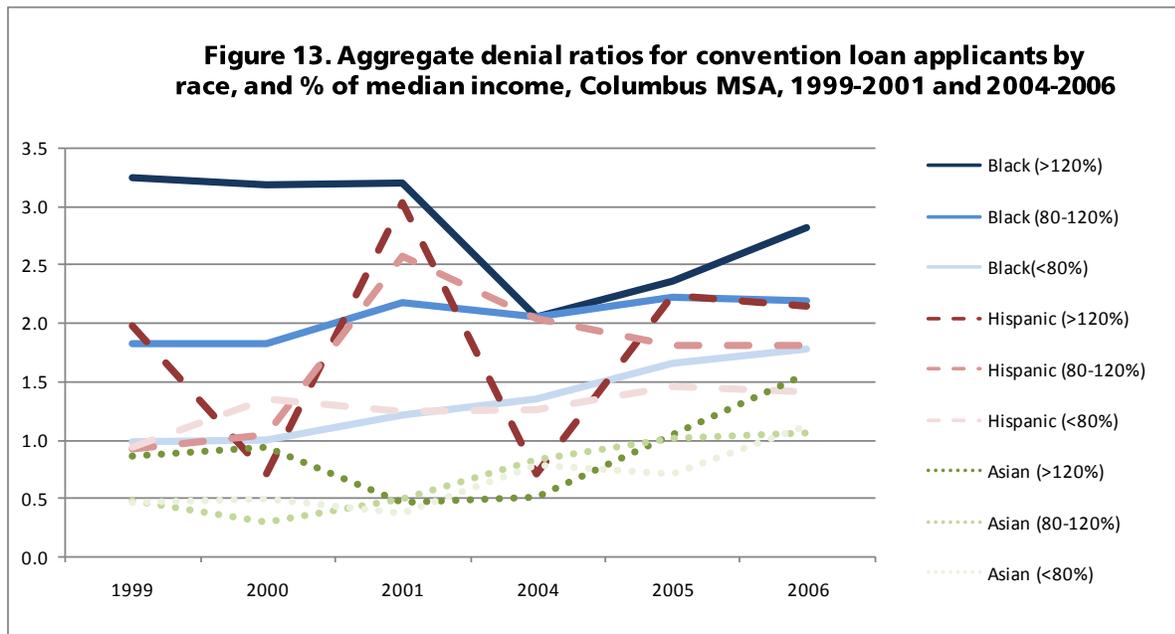
Table 15. Disposition of loan applications by race, Columbus MSA, 2006

	NUMBER OF LOANS ON 1-4 FAMILY DWELLING			
	GOVERNMENT HOME PURCHASE LOANS	CONVENTIONAL HOME PURCHASE	REFINANCE	HOME IMPROVEMENT
White Apps. Received	4,516	39,062	52,254	8,066
Originated	74.0%	69.0%	42.8%	46.0%
Denied	10.9%	13.1%	30.5%	37.0%
Other Disposition	15.2%	17.9%	26.7%	16.9%
Black Apps. Received	1,009	7,188	9,149	1,635
Originated	61.5%	46.1%	30.3%	26.9%
Denied	20.1%	29.1%	42.0%	59.4%
Other Disposition	18.3%	24.8%	27.8%	13.8%
Other Apps. Received	561	7,751	16,078	1,772
Originated	60.6%	54.4%	23.0%	32.4%
Denied	17.6%	20.2%	35.5%	45.5%
Other Disposition	21.7%	25.4%	41.5%	22.1%

Source: HMDA Aggregate Reports, 2006

Controlling the data for income shows that the gap in denial rates between whites and minorities persists and actually increases as income levels rise. Figure 13 shows that denial rates are higher for black and Hispanic loan applicants than for whites (i.e. denial ratio is higher than 1.0). In 2006, denial ratios for blacks, Hispanics, and Asians making less than 80% of the area median income were 1.8, 1.4, and 1.1 respectively. The same three racial/ethnic groups at over 120% of median income had denial ratios of 2.8, 2.2, and 1.6 respectively.

After some progress in the early 2000s, the denial ratios for blacks, Hispanics, and Asians have generally risen since 2004. Future data may show what effects, if any, the tightening credit market is having on minorities, even those with higher incomes.



(Note on legend: Blue, red, and green are assigned to blacks, Hispanics, and Asians respectively. The color becomes more intense as the income range rises.)

Source: HMDA Aggregate Reports. The website does not download 2002 and 2003 data by race and income.

Data on reasons for denial show credit history as the top reason across racial groups and loan types. Debt-to-income ratio is the second most frequent reason for government purchase and home improvement loans, while collateral generally ranks second for convention purchase and refinancing loans. While there are some variations by race, the data does not distinguish any particular areas where denials for blacks and other minorities may be concentrated.

Table 16. Reasons for denial of loan applications for 1-4 family homes, Columbus MSA, 2006

	GOVERNMENT HOME PURCHASE LOANS	CONVENTIONAL HOME PURCHASE	REFINANCE	HOME IMPROVEMENT
White Applicants				
Credit History	42.3%	20.7%	26.2%	51.3%
Debt-to-Income Ratio	21.4%	13.3%	15.1%	17.2%
Collateral	5.4%	14.9%	22.2%	14.6%
Credit app incomplete	8.1%	11.2%	9.3%	3.0%
Other	22.7%	39.9%	27.3%	13.9%
Black Applicants				
Credit History	42.7%	20.3%	30.5%	62.2%
Debt-to-Income Ratio	24.4%	13.8%	15.5%	18.2%
Collateral	2.8%	14.4%	18.2%	7.5%
Credit app incomplete	4.9%	8.5%	8.2%	2.8%
Other	25.2%	43.0%	27.7%	9.4%
Other Applicants				
Credit History	33.6%	20.1%	28.7%	50.6%
Debt-to-Income Ratio	26.4%	14.2%	14.8%	15.9%
Collateral	3.2%	14.0%	20.3%	15.2%
Credit app incomplete	5.6%	11.0%	7.2%	3.9%
Other	31.2%	40.8%	29.0%	14.5%

Source: HMDA Aggregate Reports, 2006

Subprime Lending

Realtors, Realtists, and lenders who participated in the focus groups discussed matters of discrimination more along the lines of disparate impact rather than differential treatment. In other words, the conditions of the housing market were having a disproportionate impact on low-income, and thereby minority, households, and that this was a much greater problem than discrimination based solely on race or ethnicity. Even though the focus group feedback does not make a direct link to fair housing issues, a growing body of research shows a clear connection between subprime lending and housing discrimination.

Paying More for the American Dream, a series of studies by organizations in six (now seven) different metropolitan areas around the nation, showed that black borrowers were 3.8 times more likely than white borrowers to receive a higher-cost home purchase loan. The ratio for Hispanic borrowers was at 3.6.⁴ Considering the denial ratios discussed above, it is not surprising that minority homebuyers are more likely to resort to higher-

⁴ California Reinvestment Corporation et al (March 2007). *Paying more for the American Dream: A multi-state analysis of higher cost home purchase lending*.

cost loans. Furthermore, not only were minorities more likely than whites to obtain subprime loans, even within the subprime market, race and ethnicity are factors on various conditions of the loan contract. Research by Gruenstein-Bocian *et al* (2006) shows that subprime loans for minorities had higher rates, fees, penalties, and other costs as compared to subprime loans for whites.⁵

Despite the problems surrounding the subprime market, a number of focus group participants noted that it did provide new opportunities for minority and low-income households. For borrowers who received fair loans in line with their ability to pay, subprime was a beneficial option. The fallout therefore impacts not only borrowers who are struggling to keep up with payment, but also potential homebuyers for whom subprime can be a reasonable and necessary alternative, yet one which the market is no longer offering.

Predatory Lending

Predatory lending involves deceiving borrowers into accepting unfair loan terms. It is important to distinguish predatory lending from legitimate subprime lending. The latter form of lending has rates above prime that are justifiable based on the additional credit risk, but still contains loan terms that are clearly disclosed and reflects the borrower's ability to pay. A loan made under a predatory lending scheme does not embody these characteristics. Some warning signs of predatory lending include but are not limited to:

- Aggressive high pressure marketing, with little time for borrower to review terms
- Steering to higher-cost loans despite borrow qualifications for better terms
- Flipping
- Excessive fees (origination, closing, broker, etc.) and penalties
- Balloon payments, negative amortization, and other terms that conceal loan cost

Anecdotal evidence has long been present that predatory lending has targeted vulnerable populations, including the elderly and less educated. Research also shows connections race, ethnicity, and income. The 2008 report of *Paying More for the American Dream* shows that, among its seven metropolitan study areas, higher cost loans represented 20% of market share in predominantly minority neighborhoods versus just 4% in predominantly white neighborhoods. Higher cost loans also had a 20% share in low-income neighborhoods versus 7% in high-income areas.⁶

In 2006, the Ohio legislature passed Senate Bill 185 to better address predatory lending practices, building upon previous legislative efforts such as the Mortgage Brokers Licensure Act by giving the Ohio Attorney General Enforcement authority over certain lending activities. This bill introduces a range of new requirements covering previously weak areas of oversight in the lending process, including:

- outlining the duties of mortgage brokers, including increased disclosure requirements
- lowering the trigger for what is considered a high-cost loan

⁵ Gruenstein-Bocian, D., Ernst, K., & Li, W. (2006, May 31). *Unfair lending: The effect of race and ethnicity on the price of subprime mortgages*. Washington, DC: Center for Responsible Lending.

⁶ California Reinvestment Corporation et al (March 2007). *Paying more for the American Dream: The subprime shakeout and its impact on lower-income and minority communities*.

- limiting prepayment penalties
- requiring continuing education for mortgage brokers and their loan officers
- requiring appraisers to be licensed
- enhancing financial literacy

As S.B. 185 took effect in January 2007, it is still early to fully assess the impacts of the legislation.

Immigrants and Lending

Focus groups specifically connected immigrants and lending in two contexts: 1) ITIN loans for illegal immigrants, and 2) *sharia* banking.

The Internal Revenue Service created Individual Tax Identification Numbers (ITIN) so that foreigners with investments in the U.S., who did not qualify for a social security number, could pay U.S. taxes owed. This opened a new avenue for illegal immigrants, who now had an alternative to the social security number for filing tax returns and taking on other transactions, including housing loans. *BusinessWeek* reported that 8 million ITINs were issued from 1996 to 2005.⁷ The immigrant organizations focus group did note that ITIN loans can be prone to a predatory lending scheme.

Islamic law, or *sharia*, prohibits the collection and payment of interest. For Muslim populations that follow this rule, sharia-compliant mortgages would help raise homeownership rates. One sharia-based alternative is a rent-to-own option that gradually transfers ownership from the bank to the resident.

Around the world, sharia financing has garnered greater attention. For instance, the British government is exploring this alternative to access capital from the Middle East.⁸ However, the topic has not been without controversy, as Muslims and non-Muslims have expressed concerns ranging from the possible interjection of religion in financing to whether sharia is disadvantageous compared to conventional mortgages.⁹

Credit and Insurance

The decline in subprime lending reflects an overall tightening of credit, further limiting opportunities for aspiring homebuyers. One Realtist estimated that credit score requirements for borrowers have gone up from around 575 to 620. The fallout of the subprime market has helped in restoring discipline with regard to loan decisions, but lenders also felt that the pendulum has swung too far the other way, blocking many applicants who do not qualify for prime loans but would be able to work with a legitimate subprime loan.

⁷ Brian Grow, with Adrienne Carter and Roger O. Crockett (July 18, 2005) "Embracing Illegals" *BusinessWeek* http://www.businessweek.com/magazine/content/05_29/b3943001_mz001.htm

⁸ Alan Schofield "Treasury plans sharia bonds" *The Times* (London), 2/17/08 <http://www.timesonline.co.uk/tol/news/politics/article3383220.ece>

⁹ Tony Wong, Tonda MacCharles "Muslim leader calls sharia loans a 'con job'" *Toronto Star* 1/30/08 <http://www.thestar.com/Business/article/298618>

This problem is further exacerbated by the increased reliance on credit scores in making loan decisions. Fair Isaac & Co., a popular source of credit scores (or FICO scores), includes the following factors and approximate weights in its credit scoring models:

- Payment history (35%)
- Amount of credit utilized (30%)
- Length of credit history (15%)
- Recent applications for credit (10%)
- Number and types of credit accounts (10%)

Automated underwriting programs take into account a range of credit-related and non-credit factors (e.g. loan characteristics) and provide a recommendation. The appeal of credit scores to lending institutions is that it is supposed to be objective and fair, excluding factors such as race, religion, gender, and other categories of protected classes. Like lenders, insurance companies have also relied more on credit scores in the form of insurance scoring. This trend is perhaps in part a response to allegations of redlining that insurers faced in the late 1990s. However, research shows that credit scores have a disparate impact on minorities and perpetuates economic disadvantages. In 2001, whites had an average credit score of 738, versus just 676 for blacks and 670 for Hispanics,¹⁰ meaning that minorities were more likely to obtain higher-cost loans and insurance. In September 2003, the Ohio Department of Insurance enacted a rule that insurance companies could not use credit scores as the sole criterion for rating or underwriting policies. However, credit scores can be used as one of several criteria.

In focus groups, several lenders and housing advocates felt that over-reliance on credit scores resulted in scant attention given to the borrower's ability to pay. Some lenders work to drill down into a loan application to determine the ability to pay and justify a loan that has merit in spite of a low credit score. They also try to work with applicants by providing advice on how to improve their credit score. As much as lenders make these efforts, collectors ultimately have better knowledge of how to work on credit scores. However, they typically do not interact with applicants in the direct and cooperative framework that lenders do. Currently, it seems that credit agencies have little accountability with regard to how they determine the credit score and how they address complaints or queries regarding a score.

Rental Housing

Perhaps due to the long-standing bias in government policy towards the American dream of homeownership, rental housing typically does not draw as much attention. However, as people living in rental housing are more likely to be poorer and of a minority group, this is an important sector within fair housing.

Data and opinions varied on the overall state of the rental market. According to the Danter Company, the vacancy rate for market-rate units doubled between 1999 and 2004, from 4.6% to 9.2%, in part due to the construction of new units. The Columbus Apartment Association has received feedback from its members that there is a soft rental

¹⁰ Wu, Chi Chi & Birnbaum, Birny (2006) *Credit Scoring and Insurance: Costing consumers billions and perpetuating the economic racial divide*. Washington D.C.: National Consumer Law Center; Center for Economic Justice.

market. Non-profit housing organizations also acknowledge that vacancies have risen, but believe that many of these units are not in an affordable price range.

As with homeowners, the downturn in the housing market has also had an impact on the rental side. Currently, there are more people seeking rental housing based on one or more of the following factors:

- Lost a home to foreclosure;
- Want to buy but cannot obtain a mortgage; or
- Waiting for signs that the market has hit bottom before making a purchase.

The Columbus Apartment Association (CAA) noted that its members are seeing more applicants for rental housing. However, the quality of these applications is often not up to standard, especially for those coming out of a foreclosure situation with a black mark on their credit history. In such cases, CAA believes that some households may be returning to their old apartment community, where property management might see the credit problems arising from foreclosure as the exception in light of a previous positive relationship.

Foreclosures have not only impacted homeowners who have had to seek rental housing, but also renters who were tenants in properties that were foreclosed. Banks and other organizations that have taken ownership of foreclosed properties tend to lack property management experience and have no desire to deal with rental tenants. They normally terminate the lease as part of the foreclosure, in which case there is little in the way of legal minimum requirements of notice, sometimes leaving renter with few options.

The 2001 Fair Housing Plan highlighted education regarding fair housing a key issue for small landlords. Feedback from focus groups and interviews seems to indicate that this situation has improved. The non-profit focus group noted that small landlords cannot afford to not know about fair housing and have come to realize this fact. However, the larger property management companies still have a knowledge advantage on fair housing with trained in-house staff and more frequent experience with the issue.

Immigrants and Rental Housing

Immigrants face a wide range of impediments with regard to rental housing. Language and cultural barriers may result in less awareness of fair housing laws and tenant rights. A landlord can take advantage of the language barrier by deliberately misinterpreting the lease contract. Other unfair practices include holding back excessive deposit amounts for simple fixes, not providing basic appliances such as a refrigerator, or charging fees for services that are normally free (e.g. water).

Illegal immigrants face additional challenges in that they do not have access to public housing programs and are also deterred from submitting a rental application to an apartment building that requests a Social Security number. Within the context of already constrained housing choice, illegal immigrants are far less likely to file a housing discrimination complaint, because the submitted information would be public record and possibly expose them to deportation. Reporting housing problems to the Columbus Police Department is not an option, as the police are under a directive to report illegal immigrants.

Immigrant populations such as Somalis and Hispanics that tend to have larger household sizes can be difficult to serve in the rental housing market, which tends to be oriented

towards smaller units. The market, on both sides of the supply-demand equation, is too specialized to be addressed by new development. To build larger units with three or more bedrooms for growing but still relatively small immigrant populations at affordable rents is a challenge. Therefore, renters have to rely on existing housing stock, where cultural norms at times vary from expectations such as occupancy restrictions, fire and building codes, and other regulations. Outreach and education may be needed to reconcile these differences. Compared to owner-occupied housing, the landlord for rentals represents an additional level of oversight.

Tenant Participation in Public Housing and Section 8

The relevance of public housing, including both housing stock and Section 8 vouchers, to fair housing is made apparent in the socioeconomic characteristics of tenants and voucher recipients. CMHA demographic data show that the majority of households in public housing are headed by females, African-Americans, and people on public income assistance. The waiting lists for housing and Section 8 have a greater proportion of households with employment income than the current households.

Table 17. Demographics of CMHA public housing and Section 8 tenants and waiting lists

HEAD OF HOUSEHOLD	PUBLIC HOUSING	PH WAITING LIST	SECTION 8	SECTION 8 WAITING LIST
Female	70.9%	71.6%	83.4%	80.0%
Black	82.3%	79.4%	76.9%	75.6%
Employed	21.7%	32.6%	35.8%	44.1%
Ohio Works First Participant	16.8%	15.1%	11.5%	15.2%

Source: CMHA, March 2008

Selection and Qualification Criteria

Criteria for selection and continued qualification of tenants for public housing and Section 8 can be a major impediment to participation. The non-profit housing focus group in particular emphasized that restrictions on voucher holders can make it easy for them to lose housing through no fault of their own. One example of this problem is HUD rules on income, which sometimes have unintended consequences for people who work temporary jobs and see their income fluctuating above and below the qualification level. Enforcement of income rules also requires significant resources of CMHA. However, a less frequent review process would increase the likelihood of fraud where someone may adjust their employment status (e.g. full-time to part-time) to qualify for public housing. The current system of monitoring appears to be a major deterrent to income reporting fraud, as CMHA currently has only nine cases.

Greater Reliance on Vouchers

As discussed earlier, the decline in the number of public housing units has increased reliance on Section 8 vouchers as the primary vehicle for publicly supported housing. The number of vouchers rose from 7,303 in November 2000 to 10,840 in December 2007. This increase has occurred even as CMHA has phased out Section 8 certificates, now solely using vouchers. The grant renewal for Shelter plus Care adds another 536

projected vouchers. In general, vouchers set a payment standard which defines the amount of rental assistance but does not limit the rent, whereas certificates cover the gap between a set maximum rent and the standard 30% of the tenant's income for housing and utilities. The exclusive use of vouchers has allowed CMHA to phase out its use of exception rents, which it had previously relied upon as a strategy to encourage the use of certificates outside of the central city. Exception rents allowed tenants to pay more than 30% of their income for housing, thereby widening housing choice. HUD may approve Section 8 exception rent limits for a community if HUD determines that certificate or voucher holders cannot locate housing bearing rents within the established Fair Market Rent (FMR) standards.

One primary drawback of vouchers is that they do not provide full flexibility on where people can live. As the voucher holder must make up the gap between the rental assistance and the market rent, many suburban rental markets remain too expensive. While there no longer are regulatory limits on rents, the market realities continue to inhibit the dispersion of Section 8 outside the central city.

Public Housing and Immigrants

Executive Order 13166, signed by President Bill Clinton in 2000, eliminates limited English proficiency as a barrier to participation by beneficiaries in all federally funded programs. In working with immigrant populations, CMHA fulfills this order by providing language interpretation services to ensure equal opportunity. CMHA contracts out for interpreters, spending in the range of \$500 to \$600 per month. This level of expenses does not justify a full-time interpreter in house. In the past, CMHA tried hiring employees who can handle housing work and also have language skills, but the dual set of responsibilities placed excessive demands of people in this position. Based on its contract, CMHA normally gives 24 hours' notice to bring in an interpreter. Where necessary, CMHA can also call in for emergency service and obtain an interpreter in 30 to 45 minutes.

5

Fair Housing Activities

This section outlines current public and private fair housing programs and activities in Columbus and Franklin County.

- 5.1 State/Statewide Fair Housing Programs and Activities
- 5.2 Local Fair Housing and Affordable Housing Activities
- 5.3 Other Fair Housing and Affordable Housing Activities
- 5.4 Assessment of Current Programs and Activities

5.1 State/Statewide Fair Housing Programs and Activities

<p>OHIO CIVIL RIGHTS COMMISSION</p>	<ul style="list-style-type: none"> • Enforces Ohio Fair Housing Law, including investigation of charges of discrimination in housing and determination of fair housing violations. • Holds statewide conferences for groups and organizations dealing with fair housing issues. • Contracts with local fair housing groups to do testing. • Secures federal funds for targeted fair housing testing, training and public education. • Provides information and technical assistance on request on Ohio Fair Housing Law and compliance and enforcement processes. • Provides training, resources, and assistance to internal staff to better address ADA issues.
<p>COALITION ON HOMELESSNESS & HOUSING IN OHIO</p>	<ul style="list-style-type: none"> • Addresses fair housing and affordable housing topics in newsletters, conferences, training, technical assistance and research. • Advocates for affordable housing and fair housing, by helping to address complaints, educate landlords, and ensure that housing accommodates the needs of seniors and people with disabilities (Fair Housing Initiatives Program). • Continued to receive HUD Outreach and Technical Assistance Grant to work with community groups and provide outreach and technical assistance to HUD tenants. • Worked with a statewide group to help pass the Ohio Homebuyers Protection Act (S.B. 185). • Helped to secure dedicated funding for the Ohio Housing Trust Fund.

5.2 Local Fair Housing & Affordable Housing Activities

Columbus Urban League

For many years the Columbus Urban League has been under contract with the City of Columbus and Franklin County to provide a variety of fair housing services to the community. The CUL Housing Department identifies the following as the programs and services they provide:

1. Housing Discrimination
 - Investigates all illegal housing discrimination complaints
 - Provides counseling and supportive services to complainants
 - Recruits and trains persons to conduct discrimination testing
 - Seeks redress through mediation, referrals, voluntary compliance or legal actions

2. Landlord-Tenant Counseling
 - Provides educational information and material to landlords and tenants
 - Referral resources (i.e. financial, legal and other services)
 - Provides intervention, mediation and supportive services for conflict resolution
3. Homeownership Counseling and Education
 - Conducts monthly 8 hour homebuyer education programs
 - Provides counseling and guidance to future homebuyers
 - Distributes information on affordable homebuyer programs
 - Provides direct mortgage default counseling and foreclosure intervention services
4. Housing Information Services
 - Distributes affordable rental housing listings
 - Financial assistance referrals
 - Government subsidized housing listings and referrals
 - Provides education and awareness to homeseekers and housing providers
 - Distributes affordable homebuyer program information
5. Outreach
 - Conducts educational/training presentations, workshops and seminars
 - Distributes brochures, posters and other informational material
 - Advocacy and network activities with housing groups, financial institutions, housing providers and others involved in the housing industry.
6. Other Activities
 - Monitors city and county affirmative marketing plans of agreements
 - Prepares reports on the financial institutions using HMDA data
 - Coordination and preparation of the Fair Housing Analysis for the City of Columbus and Franklin County.

5.3 Other Fair Housing & Affordable Housing Activities

AFFORDABLE HOUSING TRUST FOR COLUMBUS AND FRANKLIN COUNTY	<ul style="list-style-type: none"> • Serve as a catalyst for the production of affordable housing. • Encourage homeownership in order to stimulate development of affordable housing in and near employment centers. • Invest in affordable residential development in older and overlooked areas of Columbus and Franklin County.
CITY OF COLUMBUS	<ul style="list-style-type: none"> • Provides funding to support fair housing education and information through the Columbus Urban League. • Provides funding for the development and preservation of affordable rental and owner housing. • Provides down payment assistance to homebuyers through American Dream Downpayment Initiative Program, which requires homebuyer education. • Established the New American Initiative to address the needs of new immigrants, including housing issues. • Provides financial assistance for home modifications to persons with disabilities. Provides free equipment to increase home safety for deaf persons.
COLUMBUS APARTMENT ASSOCIATION	<ul style="list-style-type: none"> • Provides fair housing training conducted by attorneys 3-4 times a year for rental office and maintenance staff. • Approved by the OCRC to do customized training for rental housing owners when there has been a fair housing violation. • Maintains video library on fair housing topics.
COLUMBUS BOARD OF REALTORS	<ul style="list-style-type: none"> • Realtors in Ohio are required to take a three hour course every three years on fair housing law. • Equal Opportunity Committee and Affordable Housing Committee help to keep realtors informed of issues related to fair housing and affordable housing. • Prepared Affordable Housing Manual, which describes lender and government affordable housing programs. • Established Affordable Housing Roundtable to provide a forum for realtors who regularly list and sell affordable housing. • Affordable Housing Certification Program recognizes realtors who have experience in working with the affordable housing market. • Supports many affordable housing organizations and activities in the community. • Participates in legislative efforts to keep regulatory burdens at a minimum. • Conducts classes and activities to for members learn more about cultural diversity in general and in professional context
COLUMBUS COMMUNITY RELATIONS COMMISSION	<ul style="list-style-type: none"> • Puts information on fair housing issues in their online newsletter. • Mediates tenant-landlord disputes. • Point of contact for fair housing discrimination complaints; refer to CUL.
COLUMBUS METROPOLITAN HOUSING AUTHORITY	<ul style="list-style-type: none"> • Manages 3,530 public housing units and administers 10,840 Section 8 vouchers in Franklin County. • Orientation briefing for new Section 8 landlords includes a fair housing component. • Tenants get a move in packet that includes a fair housing discrimination complaint form. Complaints are referred to the Urban League or the Legal Aid Society.

	<ul style="list-style-type: none"> • Works with CUL to provide fair housing brochures, literature, posters for public housing tenants. • Holds quarterly Section 8 landlord meetings, which sometimes involve discussion of fair housing issues. • Quarterly newsletter is sent to Section 8 landlords. Occasionally prepare a fair housing issue.
COMMUNITY SHELTER BOARD	<ul style="list-style-type: none"> • Continuum of Care Steering Committee discusses issues related to tenant selection, intake and eviction policies of supportive housing providers. • Provides funding for the development and operation of supportive housing. • Established a Funder Collaborative for the Rebuilding Lives initiative to serve as a central source for affordable housing support.
EQUAL JUSTICE FOUNDATION	<ul style="list-style-type: none"> • Challenges unfair practices and policies of governments, corporations, brokers and lenders • Addresses systemic obstacles that negatively impact our client community • Develops novel legal theories to expand coverage of civil rights and consumer protection laws
FRANKLIN COUNTY	<ul style="list-style-type: none"> • Provides funding to support fair housing education and information through the Columbus Urban League. • Provides funding for the development and preservation of affordable rental and owner housing. • Authorizes tax exempt bonds used to fund affordable housing, including housing for very low income households. • Provides several homebuyer education and foreclosure prevention programs. • Created the "Foreclosure Intervention Resource Service Team" (FIRST) to provide advice and referrals to people facing foreclosure (County Treasurer). • Conducts Down Payment Assistance Program for homebuyers, which includes homebuyer education requirements. • Hired housing retention specialist to retain housing supply for low- and moderate-income disabled residents. • Provides assistance for home modifications to persons with disabilities.
JOINT COLUMBUS AND FRANKLIN COUNTY HOUSING ADVISORY BOARD	<ul style="list-style-type: none"> • Expands and preserves the supply of affordable rental housing throughout the county • Reviews and recommends to the Franklin County Board of Commissioners all requests for housing bonds
LEGAL AID SOCIETY OF COLUMBUS	<ul style="list-style-type: none"> • Provides legal services for tenants involved in landlord-tenant disputes. • Serves as point of contact for fair housing complaints, which are referred to CUL.
LENDERS	<ul style="list-style-type: none"> • Provide mortgage financing and financing for rental housing development. • Conduct training about the homebuyer process and the bank's products. • Provide in-house training for bank staff on fair housing law.
MOBILE	<ul style="list-style-type: none"> • Provides advocacy and housing information and referrals for persons with physical disabilities. • Provides training in independent living skills for persons with disabilities. • Provides home modifications to remove structural barriers in the homes of people with disabilities.

<p>STATE OF OHIO</p>	<ul style="list-style-type: none"> • Offers affordable housing opportunities to buyers and renters, including senior citizens and other populations with special needs who otherwise might not be able to afford quality housing (Ohio Housing Finance Agency). • Provides access to financial resources for the development and management of quality, affordable housing (OHFA). • Provides funding for a wide range of housing activities including housing development, emergency home repair, handicapped accessibility modifications, services related to housing and homelessness, and foreclosure prevention (Ohio Housing Trust Fund).
<p>UNITED WAY IMPACT COUNCILS</p>	<ul style="list-style-type: none"> • Forum for discussion of issues related to affordable housing in the community • Two of its four impact areas – Building Vibrant Neighborhoods and Strengthening Individuals and Families - guide resource allocation towards safe, affordable housing.

5.4 Assessment of Current Programs and Activities

The following are preliminary conclusions about the current fair housing programs and activities that may be useful as a starting point for developing a fair housing action plan:

- **Coordination**– The presence of a wide array of organizations results in a decentralized manner of addressing housing issues. Organizations sometimes coalesce around issues such as predatory lending, but overall there is limited venue for sharing information and best practices.
- **Education & Training**– The 2001 Fair Housing Plan noted “silos” as an issue with regard to fair housing training and resources. While it can be advantageous to have a curriculum tailored specifically to the needs of a particular audience (landlords, developers, non-profits, etc.), the big picture on fair housing laws may be missing. Currently there are some efforts at coordinated training, but further cooperation may help overall relationships between different sectors.
- **Online Information**– Many organizations and programs now provide information online, sometimes in addition to mailed information and newsletters, but more often in substitution of regular mail. The Internet is advantageous in the volume of information that it can provide on an ongoing basis. However, for organizations that are trying to reach the broader public, in particular the protected classes, Internet access may be an issue.

6

Recommendations and Conclusions

This section presents recommendations and conclusions for addressing impediments to fair housing.

- 6.1 Overcoming Impediments for Housing Providers
- 6.2 Overcoming Impediments for Housing Consumers

6.1 Overcoming Impediments for Housing Providers

Infrastructure and Services

- Continue and enhance alignment of infrastructure provision to support income-diverse housing

The City of Columbus already uses its Capital Improvement Plan (CIP), tax-increment financing (TIF), and other tools to support development that fulfills broader planning objectives, including affordable housing. Franklin County uses its HUD funds for infrastructure to support affordable housing and economic development projects. There is opportunity to expand the use of incentives to support affordable and special needs housing where appropriate.

- Develop comprehensive long-term solutions for infrastructure improvement

Beyond the incremental improvements described above, there is a clear need for more comprehensive program of financing infrastructure improvements that links to future development. Such solutions may involve public-private partnerships, realignment of the state's infrastructure investments, and municipal bonding.

NIMBY

- Educate general public and elected officials about affordable and supportive housing

Whether as part of community-wide or project-specific visioning processes, public agencies should use tangible and visual means of demonstrating the need - and potential desirability - for density and affordable housing, especially in mixed-use, mixed-income settings that are supported by infrastructure (e.g. transit).

- Document outcomes of Good Neighbor Agreements, Cooperation Agreements, and other community processes

Anecdotal accounts exist about projects that underwent significant public scrutiny but turned out to have little, if any, of the negative impacts originally anticipated. These cases should be researched and documented to serve as an educational tool in response to future NIMBY obstacles.

- Better define the role of Area Commissions

While the role of Area Commissions in Columbus is defined in the city code, individual commissions vary in how they exercise their role in the approval process. The City should provide guidance on how commissions can appropriately maximize their role, at both the Council level and through staff working at the neighborhood level.

Development Regulations, Fees, Zoning Requirements

- Use best practice models from Columbus and suburbs

Since the 2001 Fair Housing Plan, the City of Columbus has introduced a Traditional Neighborhood Development code and a One Stop Shop for

development approval with related guidance documents, and implemented many of the recommendations from the Mayor's Housing Task Force. At a smaller scale, some suburban municipalities have taken similar steps in promoting more urban, mixed-use development.

- **Revise suburban development regulations to incentivize affordable housing**

The downturn in the housing market and reduced development pressures provide suburban planning and zoning bodies the opportunity to revisit regulations in a calmer setting than during the market's peak. Municipalities should take advantage of this window before the market revives to better guide future growth.

Public Housing and Section 8 Units

- **Increase use of public-private partnerships**

CMHA is already partnering with the private sector to undertake development projects. With continuing trends such as the decline in the number of public housing units, difficulties in dispersing Section 8 vouchers, and limited resources, public-private partnerships may have to be a more central part of the agency's housing strategy.

Compliance with Fair Housing Accessibility and ADA Requirements

- **Continue education activities regarding housing discrimination against disabled persons and other less familiar protected classes.**

HUD research shows that public awareness of housing discrimination varies by protected class. In recent years, COHHIO, OCRC, and other organizations have focused on disabilities, training both internal staff and the general public. These efforts will need to continue to distinguish that protected status signifies the need for equal opportunity, not special treatment. Education will also have to include Ohio's most recent addition to the list of protected classes- military status.

- **Provide guidance on the definition of "reasonable accommodation"**

Despite efforts to date in defining this term, it seems that developers and landlords continue to need assistance on a case-by-case basis. In addition to the general principles that exist, the best approach to tackling this issue appears to be teaching by example, with a catalog or database of scenarios. Any guidance should be vetted through relevant federal agencies.

6.2 Overcoming Impediments for Housing Consumers

Real Estate Industry

- **Require homebuyer education as part of the homebuying process**

Realtors who request that a buyer undertake homebuyer education may be at a disadvantage to others. The best means of eliminating this particular competitive

pressure, especially in light of the extent of the foreclosure problem, may be to require a financial education program for all homebuyers. The City of Columbus and Franklin County have homebuyer certification requirements for their down payment assistance programs. These kinds of linkages could be expanded.

- **Continue and increase educational activities on cultural awareness**

The Columbus Board of Realtors has a range of courses and activities in response to the growing diversity of central Ohio. There is demand for this initiative to be expanded. Coordination with the City of Columbus and non-profit organizations may help stretch resources for more activities.

- **Explore alternative means of outreach to people who do not have Internet access**

The growing expectation and norm that people have Internet access puts those who lack access at a greater disadvantage in terms of information on real estate, credit, loan opportunities, and other aspects of the housing sector. Government agencies, non-profits, and professional organizations should be mindful that online information may not always be sufficient.

Lending

- **Conduct research on the factors behind continued disparities among racial and ethnic groups**

As discrepancies in loan decisions persist along racial and ethnic lines, research is needed to determine how much of this gap is due to differential treatment versus disparate effects. The outcomes of such research will help outline the actions that need to be taken to reduce disparities.

- **Monitor effectiveness of Senate Bill 185 (anti-predatory lending)**

S.B. 185 resulted in a wide range of rule changes in terms of regulation and enforcement. The group of stakeholders that worked to help bring about this legislation should continue to cooperate to ensure that the law is having the desired and intended effect.

- **Conduct research and create guidance or rules on alternative forms of financing or lending such as *sharia* or ITIN**

Growing markets for other financing mechanisms provide an opportunity to promote homeownership among certain minority groups. However, these markets are operating on a somewhat informal basis, which may produce negative impacts in the future if unchecked.

Credit and Insurance

- **Clarify how credit scores are determined and used**

Considering the prominence of credit scores in loan decisions, credit agencies and lenders should be held more accountable for scoring methodology and the use of scores. This would likely require state action.

Rental Housing

- **Strengthen tenant rights, especially in the case of foreclosure**

Government response to the foreclosure issue has been focused on lenders and homebuyers. However, renters have also been affected where they live in a property that is foreclosed and the lease is terminated. Recognizing that many investors that take a property through foreclosure do not want a landlord role, any regulation should be accompanied by technical assistance in property management.

- **Clarify relationship and boundaries between housing and immigration laws and enforcement**

There is a need for cross-agency discussion about whether and how housing and immigration laws should interact. Municipalities have ranged widely from incorporating immigration enforcement into housing ordinances to having a firewall between the two areas. In Columbus, the Police Department has a directive to report illegal immigrants to federal authorities, but the relationship to housing is not defined.

Tenant Participation in Public Housing and Section 8

- **Advocate for changes in public housing and Section 8 qualification criteria to recognize fluctuations in the lives of beneficiaries**

For beneficiaries whose living and financial conditions can fluctuate greatly due to employment status, health, and other issues, meeting the qualification criteria on a constant basis can be difficult. As this is not an issue specific to CMHA or HUD programs, there should be opportunities for a wider coalition of stakeholders to lobby for changes.

7

Fair Housing Action Plan

This section outlines action steps for the City of Columbus, Franklin County, Columbus Urban League and other stakeholders to address impediments to fair housing.

7.1 Fair Housing Action Plan

7.1 Fair Housing Action Plan

The Columbus and Franklin County Fair Housing Action Plan was developed by the Columbus Urban League with input from the City of Columbus, Franklin County, and other stakeholders. The Action Plan follows the outline of the Analysis of Impediments (AI) and the recommendations of the previous chapter.

The Action Plan includes the following components:

- **Subject** – Major themes that correspond with the subheadings in the AI.
- **Impediment** – Brief description of impediment discussed in the AI.
- **No.** – Item number, included for ease of reference.
- **Proposed Action** - Specific recommendations to address impediment.
- **Columbus Urban League Role** – The role of the Columbus Urban League, where applicable, in implementing the action. If the square is shaded, CUL does not have a role in implementing the action.
- **Other Recommended Participants** – Key organizations or groups in the community whose participation is necessary to implement the action. If the square is shaded, there are no other participants recommended to have a role in implementing the action.
- **Timeframe** – When work on the action is targeted to begin:
 1. Short-term - Initiate the action within one year
 2. Mid-term - Initiate by year two
 3. Long-term - Initiate by year three
 4. Ongoing - The action is currently being implemented or has been implemented in the past, and should be continued or enhanced during the next three years.
 5. New - The action has not been previously been undertaken in the community.

Subject	Impediment or Issue	No.	Proposed Action	Columbus Urban League Role	Other Recommended Participants	Timeframe
General	There is a need for regional coordination on fair housing issues, especially as this Fair Housing Action Plan lists a wide range of participants necessary for implementation.	1	Reactivate the Housing Roundtable to serve as a forum for regional coordination, and include a wide range of relevant housing sectors and organizations.	Reach out to key stakeholders to participate in Roundtable and serve as convener.	MORPC, Franklin County, City of Columbus, suburban municipalities, housing non-profit organizations and developers	Short-Term/ New
	Some shifts have occurred in the types of housing discrimination complaints reported to the Columbus Urban League. These changes may be due to increased education, awareness, or discrimination occurring.	2	Review the Columbus Urban League's fair housing discrimination complaint process on a regular basis to assure its continued effectiveness and to incorporate changes in laws, regulations and community conditions.	Conduct a review process that includes assessments from Columbus, Franklin County, other organizations and consumers.	Other organizations that review or refer complaints. People who file complaints.	Short-Term/ Ongoing
	The growing number of foreclosures is having a disparate impact on low-income and minority households (also see Items Nos. 29 and 36).	3	Prevent foreclosures where feasible and reduce impacts, especially where protected classes are disproportionately affected.	Continue to participate in larger initiatives on the foreclosure issue. Link these efforts to fair housing objectives.	Multiple	Short-Term/ Ongoing
Infrastructure & Services	Developable land with infrastructure is expensive. Existing infrastructure may not be able to support more intensive redevelopment or infill.	4	Create a sustained citywide funding mechanism for infrastructure rehabilitation and maintenance.		City of Columbus, Franklin County	Long-Term/ New

Subject	Impediment or Issue	No.	Proposed Action	Columbus Urban League Role	Other Recommended Participants	Timeframe
NIMBY	Public concerns about affordable and special needs housing.	5	Educate public about affordable and special needs housing, including the need, community benefits and impacts.	Serve in a support role for other participants.	MORPC, Franklin County, City of Columbus suburban municipalities	Mid-Term/ Ongoing
	Public concerns about development density.	6	Use tools such as Visual Preference Surveys to show that residential density can be designed appropriately into the neighborhood context.		MORPC, Franklin County, suburban municipalities	Mid-Term/ New
	Public concerns about supportive and public housing.	7	Produce case studies for Cooperation Agreements and Good Neighbor Agreements, comparing community concerns prior to projects and their impacts (or lack thereof) on neighborhood safety and home values afterwards.	Gather data from other participants and produce a public, user-friendly case study document.	City of Columbus, suburban municipalities, Franklin County, CMHA, MORPC	Short-Term/ New
	Area Commissions vary in how much authority they exercise.	8	Provide guidance and best practices for Area Commissions and their role in the City's approval process.		City of Columbus	Short-Term/ New
Development Regulations, Fees, Zoning Requirements	Suburban municipalities have regulations that limit the development of affordable housing.	9	Incentivize the development of affordable housing in suburban jurisdictions, through new programs by channeling existing resources.		Suburban municipalities, MORPC, Franklin County, State of Ohio	Long-Term/ New

Subject	Impediment or Issue	No.	Proposed Action	Columbus Urban League Role	Other Recommended Participants	Timeframe
	Franklin County currently has criteria that reward points for affordable housing, but there could be greater influence.	10	Require suburban jurisdictions to develop and implement a fair housing strategy if they receive Franklin County CDBG funds, HOME funds or tax abatement for job creation.	Provide technical assistance to suburban jurisdictions in developing fair housing strategies.	Suburban municipalities, Franklin County	Long-Term/ New
	The City currently uses TIF and a part of its CIP to help cover infrastructure costs for affordable housing.	11	Continue to look at ways TIF and other tax incentives can support affordable housing and supporting infrastructure improvements.		City of Columbus, Franklin County	Mid-Term/ Ongoing
	TIF works with large-scale projects, and City programs supporting infrastructure improvements for infill facilitate small-scale projects.	12	Find ways of filling the gap in medium-size projects via financing mechanisms or programs for infrastructure improvements.		City of Columbus, Franklin County	Long-Term/ New
Public Housing and Section 8 Units	Public housing stock continues to decline in Columbus and Franklin County.	13	Continue to explore alternative methods of replacing older stock (e.g. LIHTC, public-private partnerships). Expand use of Cooperation Agreements to facilitate development of new projects.		CMHA, non-profit developers	Mid-Term/ Ongoing
	Section 8 vouchers remain concentrated in Columbus and particularly in older Columbus (1950 boundaries).	14	Research the effectiveness of Section 8 vouchers by market area, specifically as to the extent they cover the gap in market rent and		CMHA	Mid-Term/ New

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			beneficiary's ability to pay. Explore using rent exceptions.			
	Out of 9,469 privately owned Section 8 units in Franklin County, 4,328 have expiration dates between late 2007 and end of 2011.	15	Monitor the status of project-based Section 8 and HUD financed properties, and identify opportunities to intervene to keep units in the affordable housing stock.	Participate in statewide and local groups that are monitoring the status of these properties.	COHHIO	Short-Term/ Ongoing
Fair Housing Accessibility and ADA Compliance	HUD research shows that public awareness of fair housing tends to be weaker regarding certain protected classes and scenarios.	16	Educate public about fair housing and housing discrimination, especially on less familiar protected classes such as disabilities, as well as familial status and military status.	Coordinate with other participants to create a fair housing awareness education program.	City of Columbus, Franklin County, OCRC, Legal Aid Society	Short-Term/ Ongoing
	There is debate, on a case-by-case basis, around the meaning of "reasonable accommodation."	17	Provide detailed guidance on the definition of "reasonable accommodation", including a broader listing of case studies and court decisions.	Produce and distribute guidance document to developers and landlords, supported by courses on the topic.	OCRC, COHHIO, Legal Aid Society, MOBILE	Mid-Term/ New
	Due to the impediments noted above in Action Plan Items X and Y, there is a need to improve compliance with accessibility laws.	18	Evaluate the compliance of rental housing with accessibility laws through a program of regular testing.	Implement testing program and report	MOBILE	Short-Term/ Ongoing

Subject	Impediment or Issue	No.	Proposed Action	Columbus Urban League Role	Other Recommended Participants	Timeframe
	City and County building code staff needs to be more aware of requirements to accommodate for disabilities.	19	Provide education on ADA and fair housing for staff in both the examination and execution of plans.	Provide training to City and County staff who are in the capacity to enforce fair housing requirements.	City of Columbus, Franklin County, OCRC, Legal Aid Society	Short-Term/ New
	City and County building codes can be enhanced in ensuring accessibility.	20	Achieve building code certification of compliance with the Americans with Disabilities Act through the U.S. Justice Department's voluntary certification program.		Franklin County, City of Columbus, suburban municipalities	Short-Term/ Ongoing
Other Housing Provider Issues	Banks are affecting the housing market and supply by holding on to foreclosed properties.	21	Require banks to place foreclosed properties back on the market.	Work with stakeholders to document the extent of the problem and advocate to state legislature.	State of Ohio	Short-Term/ New
Real Estate Industry	Many homebuyers are not aware of various aspects of purchasing a home, but often do not feel as if they need to be educated on the subject.	22	Make homebuyer education a required part of the homebuying process, and provide the requisite resources to implement this education programs.	Work with stakeholders to demonstrate effectiveness of homebuyer education and advocate to state legislature.	State of Ohio, Franklin County, City of Columbus, lenders, housing counseling organizations	Long-Term/ New

Subject	Impediment or Issue	No.	Proposed Action	Columbus Urban League Role	Other Recommended Participants	Timeframe
	While the percentage of loan applications by minorities is up, differences persist overall in homeownership rates and loan decisions.	23	Assess discrimination in the sale of housing through a regular, periodic testing program.	Implement a testing program and report the results to the community.	Columbus Board of Realtors (Equal Opportunity Committee)	Short-Term/ Ongoing
	The Columbus Board of Realtors already has various courses and activities, but members still want and need more education.	24	Build on existing programs and activities regarding cultural awareness and diversity.	Serve as a resource in a training capacity and networking with immigrant organizations.	Columbus Board of Realtors	Short-Term/ Ongoing
	While the Internet has been beneficial in making information (housing, credit, government programs) more accessible, those without access are left at a greater disadvantage.	25	Create alternative ways of reaching out and providing information to people who may not have regular Internet access.	Facilitate discussion to produce outreach strategies.	City of Columbus, CMHA, Columbus Board of Realtors	Mid-Term/ New
Lending	Homebuyer education would be more effective if people already had some foundation in financial literacy (see also Item No. 22).	26	Introduce financial literacy education at the high school level.		Columbus Public Schools, other school districts in Franklin County	Long-Term/ New
	The percentage of prime housing loan applications by minorities has reached parity with their share of the population.	27	Monitor whether this positive trend continues.	Update data and conduct more in-depth research (e.g. break down data by		Short-Term/ Ongoing

Subject	Impediment or Issue	No.	Proposed Action	Columbus Urban League Role	Other Recommended Participants	Timeframe
				race/ethnicity).		
	Loan applications by minorities are denied at higher rates than those by whites, even when controlling for income. The denial ratio actually increases as income increases.	28	Conduct research as to why higher denial rates for prime loan applications persist for minorities. How much is due to racial discrimination versus non-income financial factors (e.g. generational transfer of wealth)?	Start research with in-depth analysis of HMDA data and determine methodology for further study.		Long-Term/ New
	Foreclosures are having a disparate impact of minority and low-income homeowners. This corresponds with research on the concentration of subprime loans and predatory lending.	29	Conduct research on patterns in loan servicing and foreclosure. Research from other parts of the U.S. can provide a model.	Undertake a study and report the results to the community.	COHHIO, Lenders	Mid-Term/ New
	The Columbus Urban League's annual report on HMDA data could be a more effective tool in analyzing trends such as those noted above in Items 26-28.	30	Modernize the Columbus Urban League's annual report on HMDA data to make it a more useful tool for shaping community housing strategies.	Expand the array of data presented in the HMDA report, include greater data analysis and explore putting the report online.		Mid-Term/ Ongoing
	A culmination of coordinated advocacy and legislative efforts, Ohio Senate Bill 185 (Predatory Lending Bill) was passed in 2006.	31	Monitor effectiveness of Ohio Senate Bill 185.		State of Ohio, COHHIO	Short-Term/ Ongoing
	Various immigrant groups use or seek alternative forms of financing for home purchases.	32	Research lending mechanisms such as ITIN and <i>sharia</i> to ensure that they are legally sound and have the	Collect and analyze information about the usage of alternative forms of financing in	CRIS and other immigrant organizations	Mid-Term/ New

Subject	Impediment or Issue	No.	Proposed Action	Columbus Urban League Role	Other Recommended Participants	Timeframe
			protections necessary to limit unfair lending practices.	the Columbus area.		
Credit and Insurance	Credit agencies are not open with regard to how they determine a credit score.	33	Make credit and insurance scoring methods more transparent and accountable.		State of Ohio, OCRC, lenders	Mid-Term/ New
	Lenders are overly reliant on credit scoring rather than the borrower's ability to pay.	34	In 2003, the Ohio Department of Insurance set a rule that insurance scoring could not be sole criterion for underwriting policies. The state could introduce a similar rule with regard to the role of credit scores in loan decisions.		State of Ohio, OCRC, lenders	Mid-Term/ New
Rental Housing	"Mom and pop" landlords do not have the scale or resources for specialized in-house expertise on fair housing.	35	Continue Columbus Apartment Association training for small landlords, but also enhance coordination with housing advocacy groups.	Ensure that CAA and other industry-based fair housing education reflects broader perspective of why such requirements exist.	CAA, OCRC	Short-Term/ Ongoing
	Tenant rights are relatively weak in Ohio and have been a major problem for renters in foreclosed properties.	36	Enhance protections for rental tenants, especially in the case of foreclosure.	Provide intervention and counseling services to affected tenants.	State of Ohio, Franklin County, City of Columbus, CAA	Short-Term/ New

Subject	Impediment or Issue	No.	Proposed Action	Columbus Urban League Role	Other Recommended Participants	Timeframe
	Illegal immigrant tenants, who may be subject to unfair housing treatment, are reluctant to report matters to public authorities.	37	Provide guidance or rules to clarify overlaps and boundaries between immigration and housing laws and enforcement.	Foster dialogue with immigrant organizations, City and County agencies, and other stakeholders.	City of Columbus (including Columbus Police Department), Franklin County	Mid-Term/ New
	American Housing Survey data shows that urban rental housing as a major area where units are in need of physical improvements.	38	Ensure quality of rental housing stock through code enforcement and incentives for housing rehabilitation.		City of Columbus, Franklin County	Mid-Term/ Ongoing
Tenant Participation in Public Housing and Section 8	For beneficiaries for whom living and financial conditions can fluctuate, HUD income and other qualification criteria can be difficult to meet on a constant basis.	39	Advocate for more graduated criteria that recognizes some fluctuation, rather than holding beneficiaries to one set standard.		CMHA	Long-Term/ New
	Landlords may be reluctant to participate in Section 8 due to concerns about excessive regulatory requirements.	40	Work with landlords and organizations such as CAA to clarify requirements.		CMHA, CAA	Long-Term/ New
Other Housing Consumer Issues	Discrimination against less well-known protected classes (e.g. familial status) may still be apparent in housing advertisements.	41	Periodically review the content of housing advertisements in local publications for illegal advertising language, and provide technical assistance and/or initiate enforcement actions.	Conduct housing advertising monitoring and take appropriate actions.		Short-Term/ Ongoing

Subject	Impediment or Issue	No.	Proposed Action	Columbus Urban League Role	Other Recommended Participants	Timeframe
	Most immigrant service organizations do not have the resources to concentrate in-depth on fair housing issues.	42	Strengthen links between immigrant service organizations and housing organizations.	Provide fair housing material, education, and information, and serve as a connector for organizations in different fields.	City of Columbus, Franklin County, CRIS and other immigrant organizations, United Way	Short-Term/ Ongoing

Stakeholder Participation



Interviews

Coalition on Homelessness and Housing in Ohio
Bill Faith

Columbus Apartment Association
Jay Scott

Columbus Community Relations Commission
Napoleon Bell

Columbus Metropolitan Housing Authority
John Hahn
Tom Dobies

Columbus Urban League
Linda Stallworth

Community Shelter Board
Tom Albanese

Ohio Civil Rights Commission
Ronnell Tomlinson

United Way of Central Ohio
Michael Wilkos

Kim Kellogg, MORPC
Vince Papsidero, City of Columbus
Rollin Seward, Franklin County
Kim Stands, Housing Division City
Tracy Swanson, City of Columbus
Kathy Werkmeister, MORPC

CRA Lenders
Jeff Gibson, Wesbanco Bank
Daniel Ruggiero, Huntington Bank
Stefanie Steward-Young, National City Bank
Cindy Windsor, Key Bank

Developers
Ron Casteel, Sovereign Homes
Skip Weiler, Robert Weiler Company

Immigrant Service Agencies
Abdul Giamma, Community Refugee and Immigration Services
Adelita Quiles, Columbus Urban League

Columbus Board of Realtors
Eric Eckert, Real Living HER
Donna Jackson, ERA Orum Stair Realtors
Lucy Jalamillo, Economic and Community Development Institute
Judy Mosier, Real Living HER
Barbara Richardson, Real Living HER
Sameerah Salahuddin, Premier Select Home
Gail Tate-Johnson, Valley Real Estate / EOC

Focus Group Participants

Columbus Realtist Association
Ellen E. Davis, RE/MAX Champions
Sarni Dickerson, Taurus
Mekei Henderson, Equity Central
Daryl Isabel, Columbus Realtist Association
Donna Jackson, ERH Orum Stair
Philicia Pegram, Keller Williams
Theadis Reagins, Fifth Third Bank
Suzanne Rheo, Your Realty
Dana Smith, OHFA
Stuart Spalt

Nonprofit Housing Professionals
David Brainin, Housing Development Consultant
Joe Maskovyak, Ohio State Legal Services Association
Anthony Penn, Community Housing Network

Public Sector Development Officials
Justin Goodwin, City of Dublin, Planning