

City of Cincinnati  
and  
Hamilton County

2014  
Analysis of  
Impediments to Fair  
Housing



# City of Cincinnati and Hamilton County Analysis of Impediments to Fair Housing

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## I. Executive Summary

This report is an analysis of impediments to fair housing choice for Cincinnati and Hamilton County. As recipients of Federal funding through the U.S. Department of Housing & Urban Development, the City and County are under an obligation to affirmatively further fair housing and conduct periodic analyses of impediments to fair housing choice. This analysis included collecting data about the county as it relates to fair housing and conducting eight focus groups of individuals knowledgeable about various aspects of the housing market in Hamilton County.

Key findings from data about the county, maps, tables and research reports include:

- The metropolitan area is 80% white, 15% African American, 2.2% Asian, and 2.7% Hispanic.
- Hamilton County is 68% white, 26% African American, 2% Asian and 2.6% Hispanic. The City of Cincinnati is 48% white, 45% African American, 1.8% Asian and 2.8% Hispanic.
- A comparison done after the 2010 census named the region the eighth most racially segregated metropolitan area in the United States.
- The Cincinnati metropolitan area has not been a significant destination for foreign immigrants for more than 100 years. While growth rates for Asian and Hispanic populations are large, they still comprise less than 5%, collectively, of the region's population. About 6% of the population report speaking a language other than English at home.
- Children under 18 years of age make up 24% of the population.
- In Hamilton County about 12% of the population has a disability; 7% of the population has ambulatory difficulty, e.g. serious difficulty walking or climbing stairs.
- A review of the location of assisted housing in Hamilton County shows a trend toward deconcentration of assisted housing from a few Cincinnati inner city neighborhoods into a wider range of City neighborhoods and into jurisdictions in the County. However, the majority of assisted housing is still found in the City with 13.4% of City households having housing assistance and 2.9% of County households having housing assistance.
- An opportunity analysis of Hamilton County shows that African Americans are disproportionately concentrated into the lowest opportunity neighborhoods. The analysis used 27 different opportunity indicators in five different opportunity areas (Education and Child Welfare, Economic Opportunity and Mobility, Housing, Neighborhood and Community Development, Public Health, Public Safety and Criminal Justice).
- There are 13 census tracts in the County that are racially concentrated areas of poverty (less than 10% White population and more than 20% poverty). About 35,000 people live in these census tracts.

- Hamilton County has 28 communities in the City and County that have been stable and racially integrated for more than 20 years. See information on stable integrated neighborhoods on page 43.
- The American home foreclosure crisis impacted African Americans in Cincinnati and Hamilton County at higher rates than other racial and ethnic groups.
- African American homebuyers face higher mortgage rejection rates than whites, regardless of their incomes.
- African American homeowners are more likely to have high-cost subprime mortgages, regardless of income, than similarly situated Latino, Caucasian, and Asian American homeowners.

This Analysis of Impediments focuses primarily on issues of housing choice related to the classes protected by Federal, state, and local laws. The Federal law prohibits housing discrimination based on race, color, national origin, religion, sex, disability or because of children in the household. In addition, in 2008, the Ohio law was amended to prohibit discrimination based on military status. Cincinnati ordinances are more restrictive than these requirements and prohibit discrimination based on marital status, Appalachian ancestry, and sexual orientation; these ordinances have been in existence for decades and were last updated in 2012.

Recent major fair housing lawsuits and complaints include the 2009 findings of racial discrimination by HUD against the Cincinnati Metropolitan Housing Authority and the resulting Voluntary Compliance Agreement. -In 2010, HOME assisted several women in the filing of a sexual harassment case against their landlord. The U.S. Department of Justice handled the case, *U.S. v. Henry Bailey*, and obtained a judgment of \$800,000 in damages and \$55,000 in civil penalties. Two Federal court cases involved disabilities, one a reasonable accommodation for a tenant and the other a zoning case against the City of Montgomery involving a group home. Both were settled.

Housing Opportunities Made Equal (HOME) is a private fair housing agency that serves the Cincinnati metropolitan area. It receives funding from the City and County and provides client services, education and outreach, a Mobility program, and a tenant advocacy program. In 2013, Housing Opportunities Made Equal received 511 complaints/inquires about housing discrimination.

Progress has been made in addressing the impediments to fair housing choice identified in 2009. A summary of these results begins on page 57. Based on the data, information, and focus group discussions seven impediments to fair housing choice are identified. Recommendations are made on actions to address each.

1. Lack of public transportation in opportunity areas
2. Zoning and building code barriers

- Zoning codes restrict the siting of group homes.
  - Within county jurisdictions, zoning limits the possibilities for affordable housing.
  - Local codes can make accessibility modifications expensive and burdensome.
3. Affordable housing is concentrated in racially segregated areas.
  4. Barriers to mobility of families with vouchers
    - Some communities have a reputation as being unwelcoming or even dangerous for African Americans.
    - Landlords can decide not to accept Housing Choice vouchers, so it is a major barrier to choice if too few participate in the program.
    - Families with vouchers are not knowledgeable about opportunity communities.
  5. Barriers for immigrant populations
    - There is a lack of Spanish-speaking staff for public services and among landlords.
    - Immigrants feel unwelcome in some communities and tend to avoid these areas.
  6. Barriers to African American Homeownership
    - Among the African American community there is a lack of understanding of the lending process, fear of predatory lending, and a general distrust of banks.
  7. Barriers to housing choice for people with disabilities
    - People don't have resources to make accessibility modifications.

## II. Introduction and Methodology

The City of Cincinnati and Hamilton County, as recipients of Federal community development funding, have an obligation to “affirmatively further fair housing.” Grantees must certify annually that they meet this obligation. HUD requires grantees to conduct periodic Analyses of Impediments to Fair Housing Choice and to take appropriate actions to overcome the effects of identified impediments.

This report is an analysis of impediments to fair housing choice for both Cincinnati and the balance of Hamilton County. These jurisdictions receive separate allocations of Federal block grant funding, but because their housing markets and fair housing issues are so related, Cincinnati and Hamilton County officials have chosen to conduct a joint Analysis.

*As required by HUD, this report covers a broad history of the City and County’s development and explains the current state of segregation and any other fair housing issues.*

### History

Hamilton County, Ohio, is part of a tri-state metropolitan area. It is bordered on the west by Indiana and on the south by Kentucky. Cincinnati became a major city early because of its location on the Ohio River, a major transportation route in the 18th and 19th centuries. It was on the border between free and slave states before the Civil War and its history as crossing point for escaping slaves is recognized in the National Underground Railroad Freedom Center, which is located on the banks of the Ohio River in downtown Cincinnati.

The Cincinnati region remains one of the 10 most racially segregated metropolitan areas in the U.S. (Source: *The Ten Most Segregated Urban Areas in the United States*,” [http://www.salon.com/news/politics/war\\_room/2011/03/29/most\\_segregated\\_cities](http://www.salon.com/news/politics/war_room/2011/03/29/most_segregated_cities)) This is not uncommon for Midwestern previously industrial urban areas.

Current racial living patterns are the result of a long history of housing discrimination. As African Americans moved to the North during the “great migration” of the early 20th century, white residents used a variety of legal methods to ensure segregation. The new towns and subdivisions built in Hamilton County at that time had restrictive covenants written into the deeds stating only people of the Caucasian race could buy or live there with the exception of live-in domestic servants. The suburb of Mariemont, which is held up nationally as a positive example of a planned urban community, was planned with deed covenants restricting it to Whites only. Even the early public housing built during the 1930s and early 1940s was racially segregated by policy of the housing authority.

During the housing boom after World War II, White families moved further out into new suburbs, often with the help of government programs that were not open to African Americans. The term “redlining” described the policy of the Federal Housing Administration of designating areas that were integrated or primarily African American as not eligible for FHA loans. This practice, which is now illegal, had a major impact on development of the new suburbs. As Whites moved out of Cincinnati neighborhoods like

Avondale and Evanston, often encouraged with active “blockbusting” by real estate agents, African American families bought up the houses. The segregation patterns established during this time linger today and can be seen in the maps in Section 3 of this Analysis.

The mandate to affirmatively further fair housing has particular historic relevance for Hamilton County. In the 1970s, Norwood became the first CDBG recipient in the country to have its funds reduced to zero by HUD because of its vocal opposition to fair housing. Racial tensions occasionally have come to the surface, from the white mob destroying the home of an African American family in Mt. Adams in 1944 to the urban riots of the 1960s. As recently as 2001 Cincinnati experienced racial unrest when a White police officer shot and killed an unarmed African American teenager.

The Cincinnati area has not been a major immigrant designation for more than a hundred years. Although this Analysis will look at all protected classes under the fair housing laws, the history of segregation in Hamilton County primarily has been about race.

The area’s racial segregation is lessening with time. Today there are many stable integrated communities in both City neighborhoods and County jurisdictions as outlined on page 43, under **Stable integrated communities**. This Analysis of Impediments to Fair Housing Choice looks at where we are today and what actions can be taken to further the process of integration in Hamilton County.

## **Methodology**

The maps and tables in Section 3 Demographic Background and Data were prepared by the staff of the Hamilton County Department of Planning and Development, City of Cincinnati Department of City Planning and Buildings, and adapted from various sources as noted. Housing Opportunities Made Equal (HOME), a private fair housing agency, was contracted to gather additional information and draft an Analysis for review by the jurisdictions.

HOME facilitated nine focus groups to gather information on fair housing impediments from different perspectives. A total of 74 individuals participated in the following group discussions:

- Hispanic immigrants and agencies serving them (conducted in Spanish)
- Hamilton County employees (including the Director of the Department of Planning and Development, Manager of Community Development, and the Director of the County’s Health District)
- City of Cincinnati employees (including the Director of Trade and Development and Division Manager of Property Maintenance and Code Enforcement)
- Affordable Housing Advocates (a coalition of housing nonprofits and civic groups)
- Cincinnati Metropolitan Housing Authority management staff (including the Chief Executive Officer)
- Cincinnati Human Relations Commission (including the Executive Director)
- Representatives of various agencies serving people with mental and physical disabilities

- Rental property managers, owners and developers (including large companies and small investors)
- Realtors (including the presidents of two large real estate companies and minority agents)

In addition to these small group facilitated discussions, HOME conducted individual interviews with people with Housing Choice Vouchers who had moved within the last couple of years. Based on comments made in several of the focus groups, HOME also conducted an individual interview with the Executive Director of the Southeast Regional Transportation Authority, which operates the public transportation system in the county.

HOME also collected data on fair housing complaints and cases in the county. It reviewed recent fair housing activities including the actions taken in response to the recommendations of the 2009 Analysis of Impediments. Based on all the collected data and information, current impediments were identified and recommendations developed on actions needed to address the impediments.

### III. Demographic Background and Data

#### POPULATION BY RACE AND ETHNICITY

Census Bureau data indicated that from 2000 to 2010 racial and ethnic compositions of Hamilton County and Cincinnati changed, with African American, Asian and Hispanic populations increasing their population share concentrations while white population decreased in share average. *(Source: Cincinnati Metropolitan Housing Authority 2012 Hamilton County Comprehensive Housing and Needs Analysis)*

#### Total Population by Jurisdiction

Jurisdiction	Population	Non-Hispanic					Hispanic
		% Caucasian	% African American	% Asian	% Other	% Two or More Races	% Hispanic
Addyston Village	938	89%	6%	0.21%	0.00%	3.41%	1.92%
Amberley Village	3,585	85%	9%	3.01%	0.25%	1.34%	1.31%
Anderson Township	43,446	94%	1%	1.96%	0.26%	1.36%	1.61%
Arlington Heights Village	745	80%	15%	0.40%	0.27%	3.49%	0.94%
Blue Ash City	12,114	78%	6%	10.62%	0.36%	1.86%	2.54%
Cheviot City	8,375	88%	7%	0.54%	0.36%	1.83%	2.03%

Jurisdiction	Population	Non-Hispanic					Hispanic
		% Caucasian	% African American	% Asian	% Other	% Two or More Races	% Hispanic
Cincinnati City	296,943	48%	45%	1.83%	0.48%	2.23%	2.80%
Cleves Village	3,234	96%	1%	0.37%	0.37%	1.27%	1.24%
Colerain Township	58,499	78%	17%	1.17%	0.45%	2.03%	1.87%
Columbia Township	4,532	59%	35%	1.43%	0.60%	1.83%	2.21%
Crosby Township	2,767	97%	0%	0.18%	0.18%	1.16%	0.90%
Deer Park City	5,736	91%	5%	1.34%	0.21%	1.41%	1.73%
Delhi Township	29,510	95%	2%	1.07%	0.22%	1.12%	0.77%
Elmwood Place Village	2,188	77%	14%	0.73%	0.82%	3.47%	3.61%
Evendale Village	2,767	88%	6%	4.30%	0.43%	0.54%	0.43%
Fairfax Village	1,699	94%	2%	0.82%	0.29%	1.53%	1.29%
Forest Park City	18,720	23%	65%	2.15%	0.83%	3.23%	6.43%
Glendale Village	2,155	80%	15%	1.48%	0.32%	1.25%	1.30%
Golf Manor Village	3,611	24%	72%	0.25%	0.39%	2.02%	1.19%
Green Township	58,370	94%	3%	0.99%	0.22%	1.07%	0.87%
Greenhills Village	3,615	87%	7%	0.83%	0.53%	3.10%	2.38%
Harrison City	9,897	97%	0%	0.62%	0.33%	0.72%	1.08%
Harrison Township	4,037	98%	0%	0.32%	0.25%	0.52%	0.87%
Lincoln Heights Village	3,286	2%	95%	0.03%	0.73%	1.89%	0.52%
Lockland Village	3,449	62%	30%	0.14%	0.38%	3.13%	4.23%
Loveland City	9,348	92%	2%	1.71%	0.22%	2.00%	2.35%
Madeira City	8,726	91%	3%	2.77%	0.16%	1.18%	2.27%
Mariemont Village	3,403	93%	2%	1.26%	0.53%	1.62%	1.59%

Jurisdiction	Population	Non-Hispanic					Hispanic
		% Caucasian	% African American	% Asian	% Other	% Two or More Races	% Hispanic
Miami Township	10,728	98%	0%	0.40%	0.19%	0.68%	0.51%
Milford City	29	97%	3%	0.00%	0.00%	0.00%	0.00%
Montgomery City	10,251	89%	3%	5.55%	0.18%	1.25%	1.79%
Mount Healthy City	6,098	62%	33%	0.69%	0.43%	2.51%	1.92%
Newtown Village	2,672	94%	1%	1.57%	0.30%	1.09%	2.13%
North Bend Village	857	97%	1%	0.47%	0.47%	0.23%	1.17%
North College Hill City	9,397	48%	46%	0.56%	0.35%	2.97%	1.33%
Norwood City	19,207	84%	8%	0.77%	0.48%	1.97%	5.06%
Reading City	10,385	88%	7%	0.96%	0.27%	1.72%	1.69%
Saint Bernard City	4,368	79%	16%	0.71%	0.53%	2.01%	1.95%
Sharonville City	11,197	78%	10%	4.15%	0.58%	2.91%	5.06%
Silverton City	4,788	43%	51%	0.79%	0.42%	2.49%	2.49%
Springdale City	11,223	47%	30%	2.73%	0.72%	2.20%	17.51%
Springfield Township	36,319	55%	40%	1.06%	0.52%	2.10%	1.81%
Sycamore Township	19,200	82%	6%	6.56%	0.44%	1.54%	2.73%
Symmes Township	14,683	79%	5%	9.24%	0.50%	1.73%	3.98%
Terrace Park Village	2,251	98%	0%	0.36%	0.00%	0.58%	0.84%
Village of Indian Hill City	5,785	91%	1%	5.74%	0.24%	0.88%	1.59%
Whitewater Township	5,519	95%	0%	0.14%	0.18%	1.14%	3.04%
Woodlawn Village	3,294	25%	67%	2.85%	0.33%	2.31%	2.34%
Wyoming City	8,428	82%	11%	2.14%	0.51%	2.03%	1.77%

The County population declined by 7.5% between the 2000 and 2010 census, representing a loss of 41,735 residents. The overwhelming majority of the total County population loss is represented by the white population. The largest population gain over the decade was seen in the Hispanic/Latino population.

**Caucasian Population:** According to the 2000 and 2010 census, the white population in Hamilton County represented the largest total number of persons with 611,767 (72.37%) in 2000 and 542,273 (67.58%) in 2010. However, the white population was the only racial group to decline, down 11.36 percent, as shown in “Change in Caucasian Population” Table on the next page.

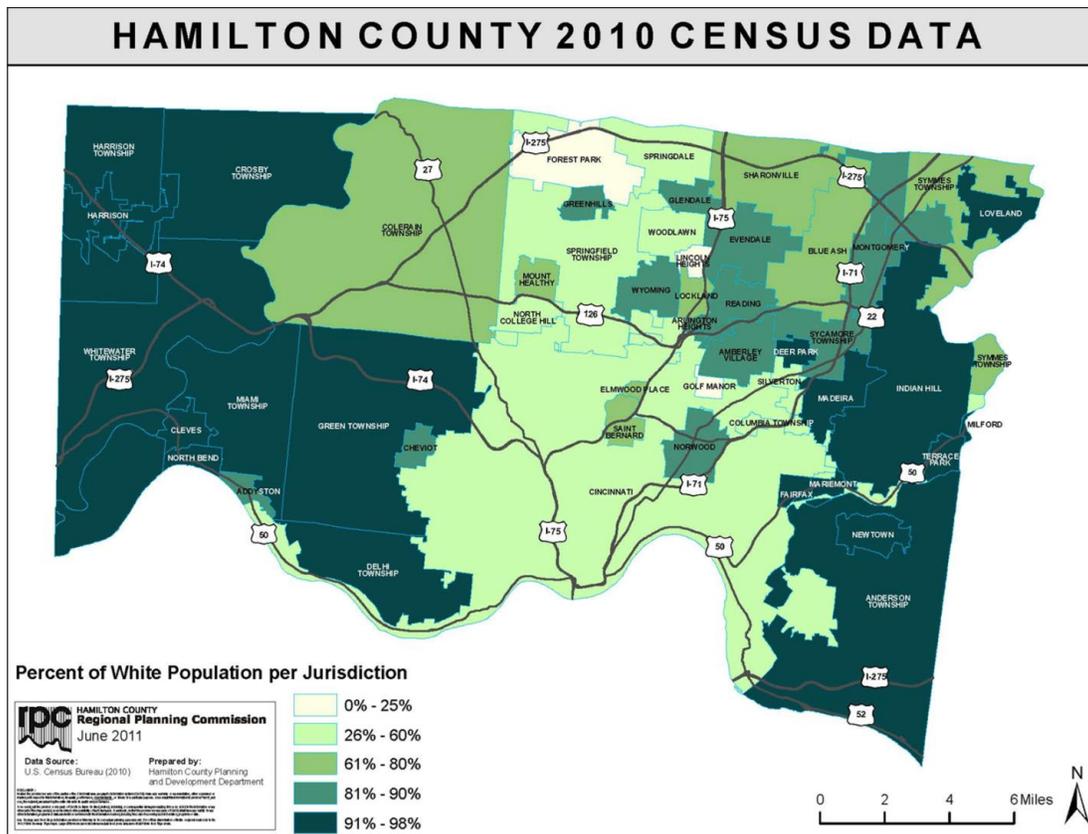
**Change in Caucasian Population by Jurisdiction**

Jurisdiction	Total Population	% Caucasian 2010	Total Population	% Caucasian 2000	% Change
Addyston Village	938	89%	1,010	87%	-5%
Amberley Village	3,585	85%	3,425	87%	2%
Anderson Township	43,446	94%	43,857	96%	-3%
Arlington Heights Village	745	80%	899	92%	-28%
Blue Ash City	12,114	78%	12,513	86%	-12%
Cheviot City	8,375	88%	9,015	96%	-15%
Cincinnati City	296,943	48%	331,285	52%	-18%
Cleves Village	3,234	96%	2,790	98%	14%
Colerain Township	58,499	78%	60,144	87%	-13%
Columbia Township	4,532	59%	4,619	61%	-5%
Crosby Township	2,767	97%	2,748	98%	0%
Deer Park City	5,736	91%	5,982	96%	-9%
Delhi Township	29,510	95%	30,104	97%	-4%
Elmwood Place Village	2,188	77%	2,681	91%	-31%
Evendale Village	2,767	88%	3,090	86%	-9%
Fairfax Village	1,699	94%	1,938	96%	-15%
Forest Park City	18,720	23%	19,463	36%	-39%

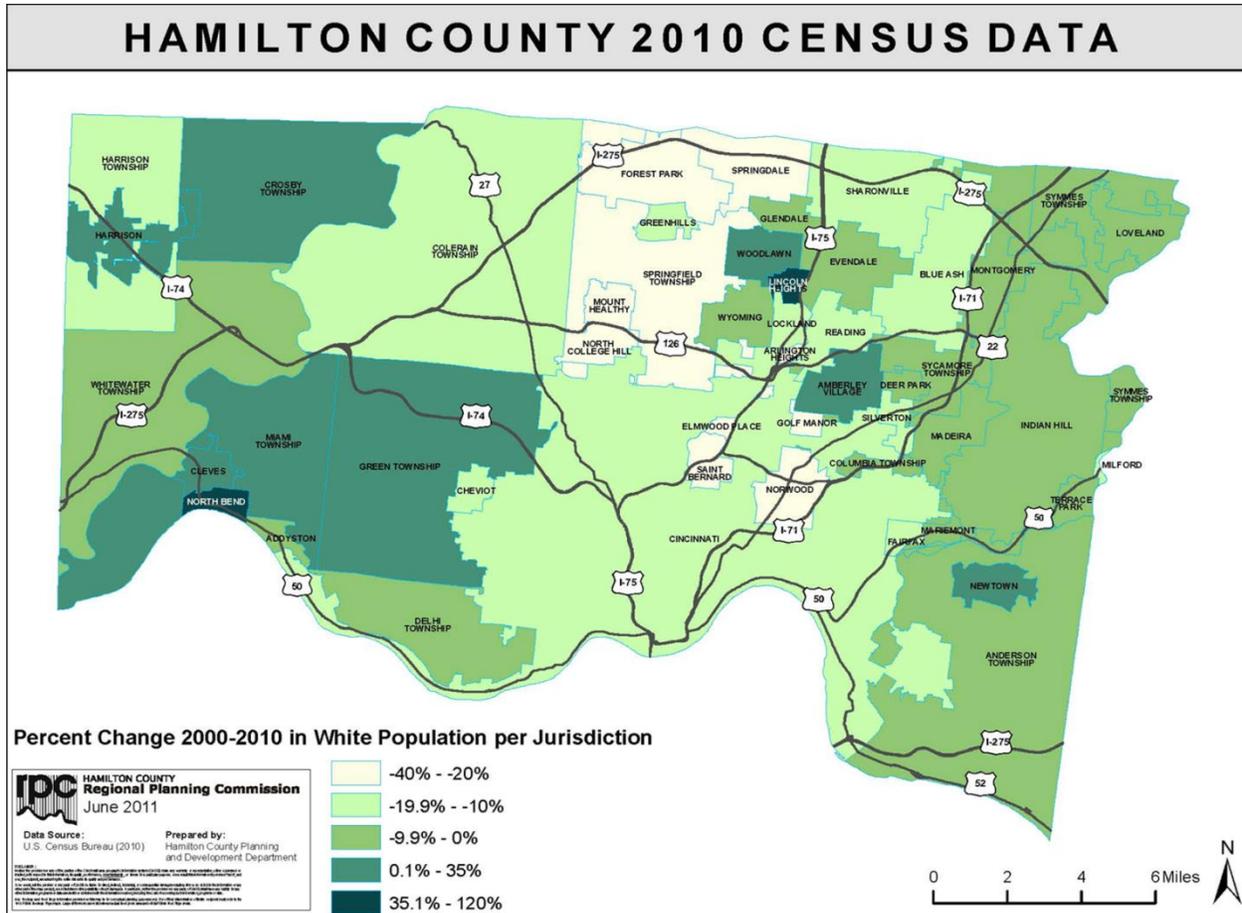
<b>Jurisdiction</b>	<b>Total Population</b>	<b>% Caucasian 2010</b>	<b>Total Population</b>	<b>% Caucasian 2000</b>	<b>% Change</b>
Glendale Village	2,155	80%	2,188	82%	-4%
Golf Manor Village	3,611	24%	3,999	34%	-36%
Green Township	58,370	94%	55,660	97%	2%
Greenhills Village	3,615	87%	4,103	94%	-19%
Harrison City	9,897	97%	7,487	98%	31%
Harrison Township	4,037	98%	4,982	98%	-19%
Lincoln Heights Village	3,286	2%	4,113	1%	117%
Lockland Village	3,449	62%	3,707	70%	-17%
Loveland City*	9,348	92%	9,561	95%	-5%
Madeira City	8,726	91%	8,923	95%	-6%
Mariemont Village	3,403	93%	3,408	97%	-3%
Miami Township	10,728	98%	9,093	98%	17%
Milford City*	29	97%	35	94%	-15%
Montgomery City	10,251	89%	10,163	93%	-4%
Mount Healthy City	6,098	62%	7,149	73%	-28%
Newtown Village	2,672	94%	2,420	95%	8%
North Bend Village	857	97%	603	100%	38%
North College Hill City	9,397	48%	10,082	76%	-41%
Norwood City	19,207	84%	21,675	93%	-20%
Reading City	10,385	88%	11,292	93%	-13%
Saint Bernard City	4,368	79%	4,924	91%	-23%
Sharonville City*	11,197	78%	11,578	87%	-13%
Silverton City	4,788	43%	5,178	45%	-13%
Springdale City	11,223	47%	10,563	66%	-24%

Jurisdiction	Total Population	% Caucasian 2010	Total Population	% Caucasian 2000	% Change
Springfield Township	36,319	55%	37,587	67%	-20%
Sycamore Township	19,200	82%	19,675	89%	-10%
Symmes Township	14,683	79%	14,771	86%	-8%
Terrace Park Village	2,251	98%	2,273	98%	-1%
The Village of Indian Hill City	5,785	91%	5,907	94%	-5%
Whitewater Township	5,519	95%	5,564	98%	-3%
Woodlawn Village	3,294	25%	2,816	27%	11%
Wyoming City	8,428	82%	8,261	87%	-3%
<b>HAMILTON COUNTY</b>	<b>802,374</b>	<b>68%</b>	<b>845,303</b>	<b>72%</b>	<b>-11%</b>

As represented on the map, “Percent of White Population per Jurisdiction,” the largest concentration of the white population is in the far western and eastern parts of the County. Fewer white residents are represented in the central part of the County, particularly in the City of Cincinnati.



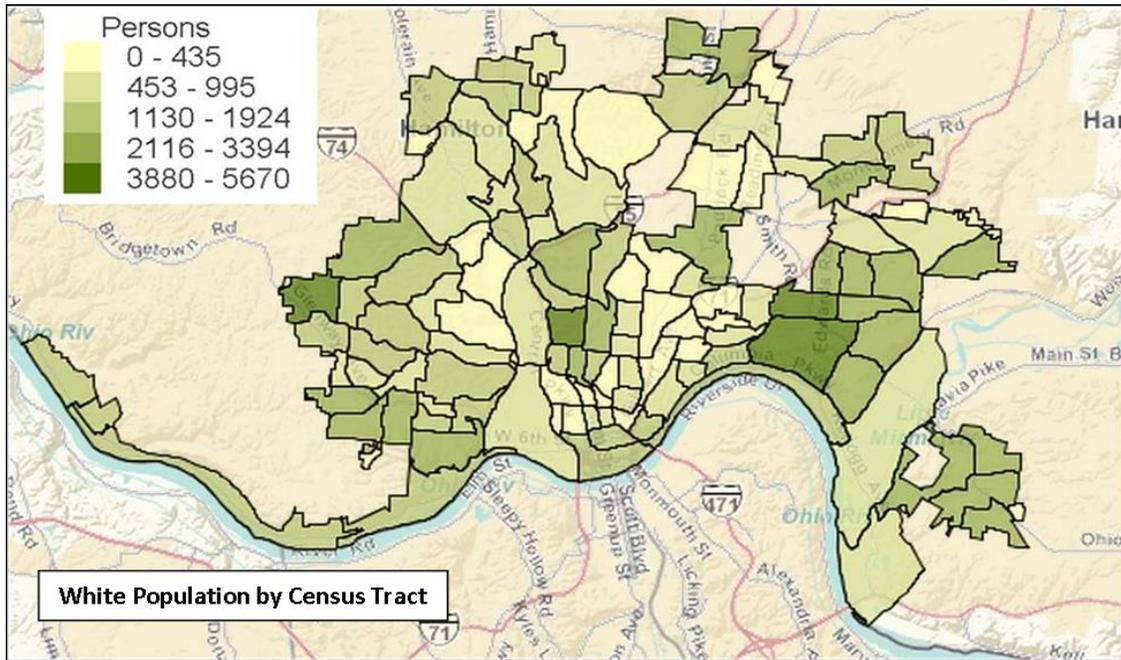
Between 2000 and 2010, 69,494 white residents left the County. The largest departure from any one jurisdiction was seen in Cincinnati with 30,950 white residents leaving the city. The largest gains in white population were in Harrison City and Miami Township, which gained, respectively, 2,270 and 1,542 white residents.



The largest numbers (142,831) of white residents live in the City of Cincinnati and represent 48.10% of the total Cincinnati population. Terrace Park Village represents the highest concentration of white residents at 98.13%, followed by Harrison Township (98.89%) and Miami Township (97.74%).

The average percent of white population per tract in Hamilton County decreased from 72.9 percent in 2000 to 68.8 percent in 2010.

The map “White Population by Census Tract” reveals that in 2010, the white population became less concentrated in several tracts relative to the countywide average. This occurred in several of the central northern tracts between Cincinnati city and Hamilton County boundaries. However, a few tracts in central Cincinnati showed relatively higher shares of white population, indicating some integration over the decade. (Source: CMHA 2012 Hamilton County Comprehensive Housing Study and Needs Analysis)



**Black/African American Population:** In reviewing the Change in Population Tables and Maps for the major race and ethnic groups, most groups show similar patterns throughout the County jurisdiction. However, a large difference between the rates of change is indicated for the African American population; in Cincinnati, this population fell by 6.52 percent while in the remainder of the County it grew by 3.5 percent. This suggests that 16,603 African American residents moved from the city to the suburbs over the decade.

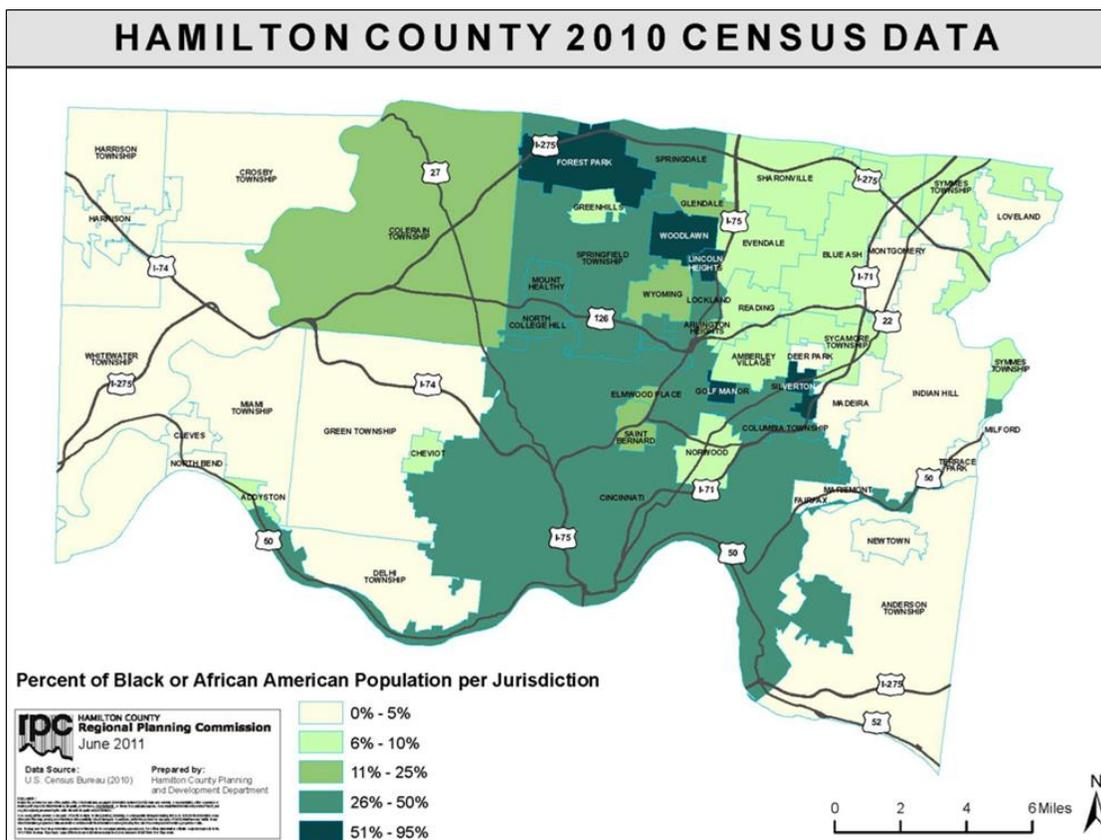
**Change in Black or African American Population by Jurisdiction**

Jurisdiction	2010		2000		2000-2010
	Total Population	% Black or African American	Total Population	% Black or African American	% Change
Addyston Village	938	5.65%	1,010	8.32%	-36.90%
Amberley Village	3,585	9.46%	3,425	8.85%	11.88%
Anderson Township	43,446	1.10%	43,857	0.73%	50.47%
Arlington Heights Village	745	14.77%	899	3.78%	223.53%
Blue Ash City	12,114	6.47%	12,513	5.00%	25.24%
Cheviot City	8,375	7.26%	9,015	0.79%	756.34%

Jurisdiction	2010		2000		2000-2010
	Total Population	% Black or African American	Total Population	% Black or African American	% Change
Cincinnati City	296,943	44.56%	331,285	42.72%	-6.52%
Cleves Village	3,234	0.59%	2,790	0.57%	18.75%
Colerain Township	58,499	16.54%	60,144	9.32%	72.59%
Columbia Township	4,532	35.15%	4,619	34.83%	-0.99%
Crosby Township	2,767	0.29%	2,748	0.15%	100.00%
Deer Park City	5,736	4.52%	5,982	1.69%	156.44%
Delhi Township	29,510	1.63%	30,104	0.53%	201.89%
Elmwood Place Village	2,188	14.49%	2,681	5.41%	118.62%
Evendale Village	2,767	6.47%	3,090	7.22%	-19.73%
Fairfax Village	1,699	2.35%	1,938	1.08%	90.48%
Forest Park City	18,720	64.57%	19,463	56.06%	10.79%
Glendale Village	2,155	15.17%	2,188	14.12%	5.83%
Golf Manor Village	3,611	72.20%	3,999	62.69%	3.99%
Green Township	58,370	2.59%	55,660	1.03%	162.50%
Greenhills Village	3,615	6.50%	4,103	2.68%	113.64%
Harrison City	9,897	0.29%	7,487	0.16%	141.67%
Harrison Township	4,037	0.15%	4,982	0.02%	500.00%
Lincoln Heights Village	3,286	95.31%	4,113	97.52%	-21.91%
Lockland Village	3,449	29.78%	3,707	26.22%	5.66%
Loveland City*	9,348	2.19%	9,561	1.76%	22.02%
Madeira City	8,726	2.51%	8,923	1.28%	92.11%
Mariemont Village	3,403	1.53%	3,408	1.00%	52.94%

Jurisdiction	2010		2000		2000-2010
	Total Population	% Black or African American	Total Population	% Black or African American	% Change
Miami Township	10,728	0.48%	9,093	0.24%	131.82%
Milford City*	29	3.45%	35	2.86%	0.00%
Montgomery City	10,251	2.68%	10,163	1.57%	71.88%
Mount Healthy City	6,098	32.70%	7,149	23.25%	19.98%
Newtown Village	2,672	1.38%	2,420	1.86%	-17.78%
North Bend Village	857	0.58%	603	0.17%	400.00%
North College Hill City	9,397	46.45%	10,082	21.64%	100.05%
Norwood City	19,207	7.54%	21,675	2.32%	188.45%
Reading City	10,385	7.23%	11,292	3.13%	112.75%
Saint Bernard City	4,368	15.66%	4,924	6.40%	117.14%
Sharonville City*	11,197	9.52%	11,578	5.18%	77.67%
Silverton City	4,788	51.29%	5,178	50.17%	-5.47%
Springdale City	11,223	29.51%	10,563	25.49%	23.03%
Springfield Township	36,319	39.65%	37,587	29.79%	28.60%
Sycamore Township	19,200	6.36%	19,675	4.49%	38.28%
Symmes Township	14,683	5.29%	14,771	4.36%	20.50%
Terrace Park Village	2,251	0.09%	2,273	0.18%	-50.00%
Village of Indian Hill City	5,785	0.67%	5,907	0.54%	21.88%
Whitewater Township	5,519	0.43%	5,564	0.32%	33.33%
Woodlawn Village	3,294	66.88%	2,816	68.22%	14.68%
Wyoming City	8,428	11.20%	8,261	9.41%	21.49%
<b>HAMILTON COUNTY</b>	<b>802,374</b>	<b>25.52%</b>	<b>845,303</b>	<b>23.33%</b>	<b>3.83%</b>

The “Percent of Black or African American Population per Jurisdiction” map indicates that the largest concentration of the African American population is in the upper northern jurisdictions of the county — in Forest Park, Woodlawn and Lincoln Heights. Fewer African American residents are represented in the far western and eastern parts of the County.

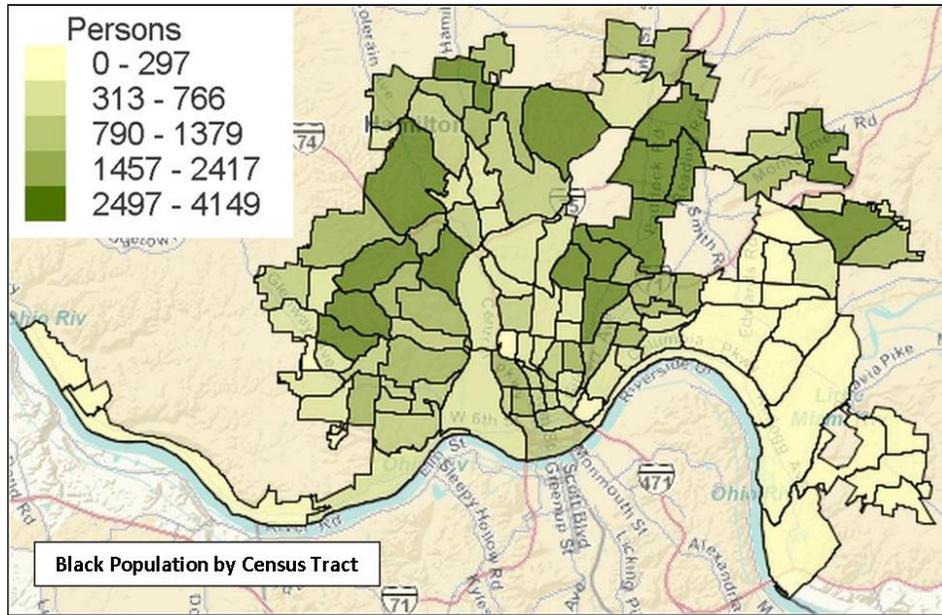


The largest numbers (132,307) of African American residents reside in the City of Cincinnati and represent 45% of the total Cincinnati population. See “Percent Change 2000-2010 of Black or African American per Jurisdiction” shows that Cincinnati lost the highest number of African American residents from 2000 to 2010 with 9,227 African American residents leaving the City. Of the African American residents who remained in the County, the largest gains were seen in the northern communities of Colerain Township (4,070), Springfield Township (3,203), and North College Hill City (2,183).

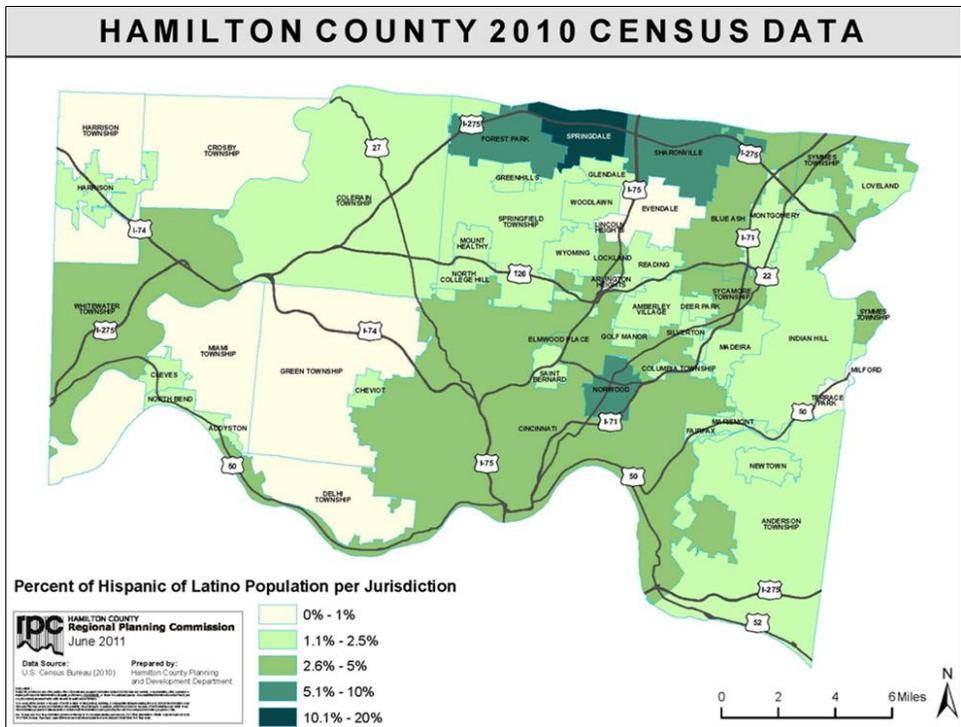
The largest concentration of African American residents is found in Lincoln Heights Village (95.31%) and Golf Manor Village (72.20%). However, the concentrations of African American residents in a particular area are not as high as the concentration of white residents as discussed in the previous section.

The map, “Black Population by Census Tract” reveals that in 2010, the African American population remained most highly concentrated in many tracts in Cincinnati, and the relative concentrations of several tracts had decreased noticeably over the decade, such as those in central Cincinnati along the river and in those along the City’s northeastern edges. This indicates a pattern of racial integration.

However, some areas, such as those in the far northern part of the County and on the southwestern parts of Cincinnati, became more highly concentrated with African American residents, indicating that this population shifted somewhat to outside the central city. (Source: CMHA 2012 Hamilton County Comprehensive Housing Study and Needs Analysis)



**Hispanic Population:** Of all the racial and ethnic groups the Hispanic/Latino population grew by 116.57% between the 2000 and 2010 Census. The total number of Hispanic/Latino residents residing in Hamilton County is 20,607, with the largest concentrations in the City of Cincinnati and the far northern community of Springdale City.



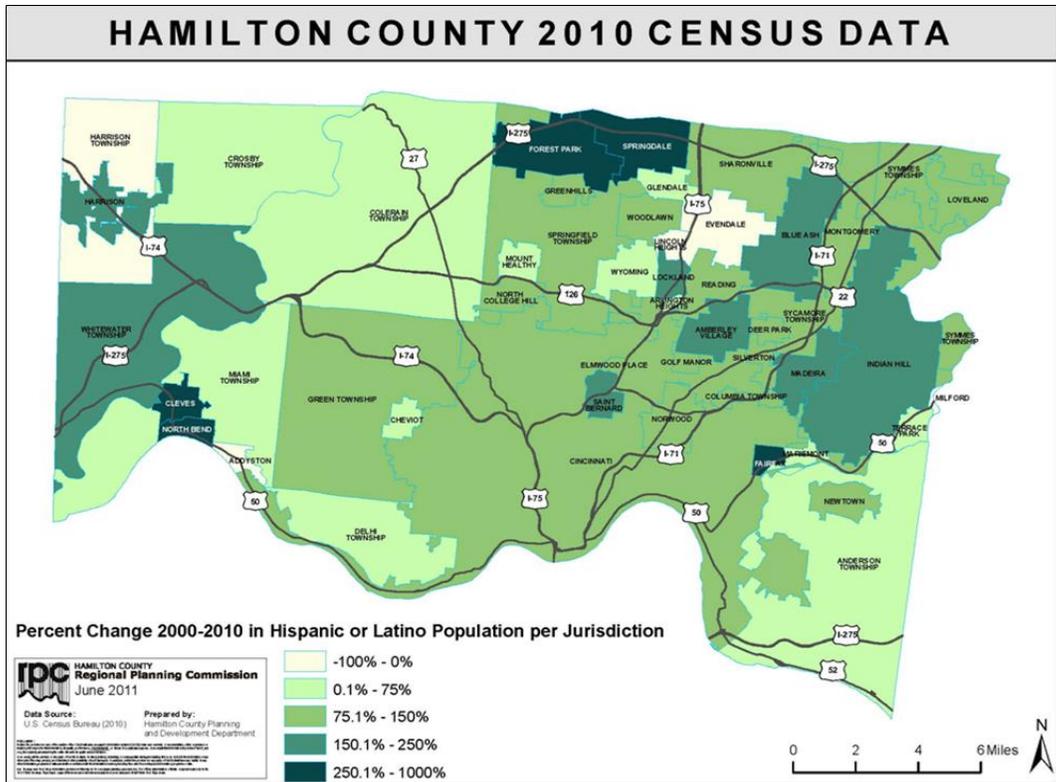
### Change in Hispanic Population by Jurisdiction

Jurisdiction	2010		2000		2000-2010
	Total Population	% Hispanic Or Latino	Total Population	% Hispanic Or Latino	% Change
Addyston Village	938	1.92%	1,010	1.78%	0.00%
Amberley Village	3,585	1.31%	3,425	0.53%	161.11%
Anderson Township	43,446	1.61%	43,857	0.97%	64.94%
Arlington Heights Village	745	0.94%	899	0.67%	16.67%
Blue Ash City	12,114	2.54%	12,513	0.97%	152.46%
Cheviot City	8,375	2.03%	9,015	1.11%	70.00%
Cincinnati City	296,943	2.80%	331,285	1.28%	96.41%
Cleves Village	3,234	1.24%	2,790	0.36%	300.00%
Colerain Township	58,499	1.87%	60,144	1.08%	68.20%
Columbia Township	4,532	2.21%	4,619	1.23%	75.44%

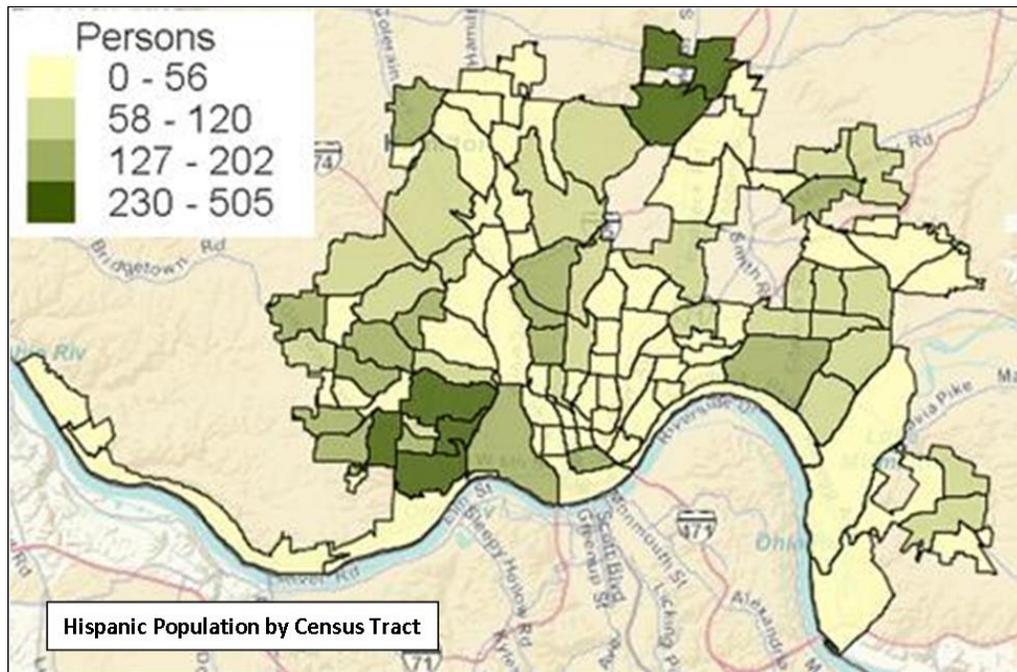
Jurisdiction	2010		2000		2000-2010
	Total Population	% Hispanic Or Latino	Total Population	% Hispanic Or Latino	% Change
Crosby Township	2,767	0.90%	2,748	0.55%	66.67%
Deer Park City	5,736	1.73%	5,982	0.67%	147.50%
Delhi Township	29,510	0.77%	30,104	0.43%	74.62%
Elmwood Place Village	2,188	3.61%	2,681	1.64%	79.55%
Evendale Village	2,767	0.43%	3,090	0.55%	-29.41%
Fairfax Village	1,699	1.29%	1,938	0.21%	450.00%
Forest Park City	18,720	6.43%	19,463	1.48%	316.61%
Glendale Village	2,155	1.30%	2,188	1.19%	7.69%
Golf Manor Village	3,611	1.19%	3,999	0.60%	79.17%
Green Township	58,370	0.87%	55,660	0.47%	92.42%
Greenhills Village	3,615	2.38%	4,103	1.19%	75.51%
Harrison City	9,897	1.08%	7,487	0.52%	174.36%
Harrison Township	4,037	0.87%	4,982	0.74%	-5.41%
Lincoln Heights Village	3,286	0.52%	4,113	0.85%	-51.43%
Lockland Village	3,449	4.23%	3,707	1.54%	156.14%
Loveland City*	9,348	2.35%	9,561	0.94%	144.44%
Madeira City	8,726	2.27%	8,923	0.77%	186.96%
Mariemont Village	3,403	1.59%	3,408	1.06%	50.00%
Miami Township	10,728	0.51%	9,093	0.53%	14.58%
Milford City*	29	0.00%	35	2.86%	-100.00%
Montgomery City	10,251	1.79%	10,163	0.77%	135.90%
Mount Healthy City	6,098	1.92%	7,149	1.02%	60.27%

Jurisdiction	2010		2000		2000-2010
	Total Population	% Hispanic Or Latino	Total Population	% Hispanic Or Latino	% Change
Newtown Village	2,672	2.13%	2,420	1.16%	103.57%
North Bend Village	857	1.17%	603	0.00%	1000.00%
North College Hill City	9,397	1.33%	10,082	0.59%	111.86%
Norwood City	19,207	5.06%	21,675	1.85%	142.39%
Reading City	10,385	1.69%	11,292	0.79%	96.63%
Saint Bernard City	4,368	1.95%	4,924	0.65%	165.63%
Sharonville City*	11,197	5.06%	11,578	2.44%	100.35%
Silverton City	4,788	2.49%	5,178	1.16%	98.33%
Springdale City	11,223	17.51%	10,563	3.64%	411.72%
Springfield Township	36,319	1.81%	37,587	0.85%	105.63%
Sycamore Township	19,200	2.73%	19,675	1.22%	117.43%
Symmes Township	14,683	3.98%	14,771	1.82%	117.47%
Terrace Park Village	2,251	0.84%	2,273	0.79%	5.56%
The Village of Indian Hill City	5,785	1.59%	5,907	0.59%	162.86%
Whitewater Township	5,519	3.04%	5,564	0.93%	223.08%
Woodlawn Village	3,294	2.34%	2,816	1.28%	113.89%
Wyoming City	8,428	1.77%	8,261	1.28%	40.57%
<b>HAMILTON COUNTY</b>	<b>802,374</b>	<b>2.57%</b>	<b>845,303</b>	<b>1.13%</b>	<b>116.57%</b>

Census tract specific data showed that the Hispanic population more than doubled from an average of 1.1 percent per tract in 2000 to 2.6 percent in 2010.



The “Hispanic Population by Census Tract” map reveals that two tracts in particular greatly increased in concentration, generally in the central northern parts of the County. Some tracts in the southwestern parts of the County also increased, representing shares above the average. (Source: CMHA 2012 Hamilton County Comprehensive Housing Study and Needs Analysis)



City of Cincinnati, 2010

**Asian Population:** The Asian population represented the second largest growth of all the racial/ethnic groups represented in the U.S. Census Data. This population grew by 18.85% over the course of the two census periods.

### Asian Population in Hamilton County

The largest concentrations of Asian residents by percentage are in Blue Ash City (10.62%) and Symmes Township (9.24%). The largest numbers of Asian residents reside in Cincinnati, 5,434; however, they represent just 1.83% of the total city population. Most of Asian population is from India with the second largest population from China.

### Change in Asian Population by Jurisdiction

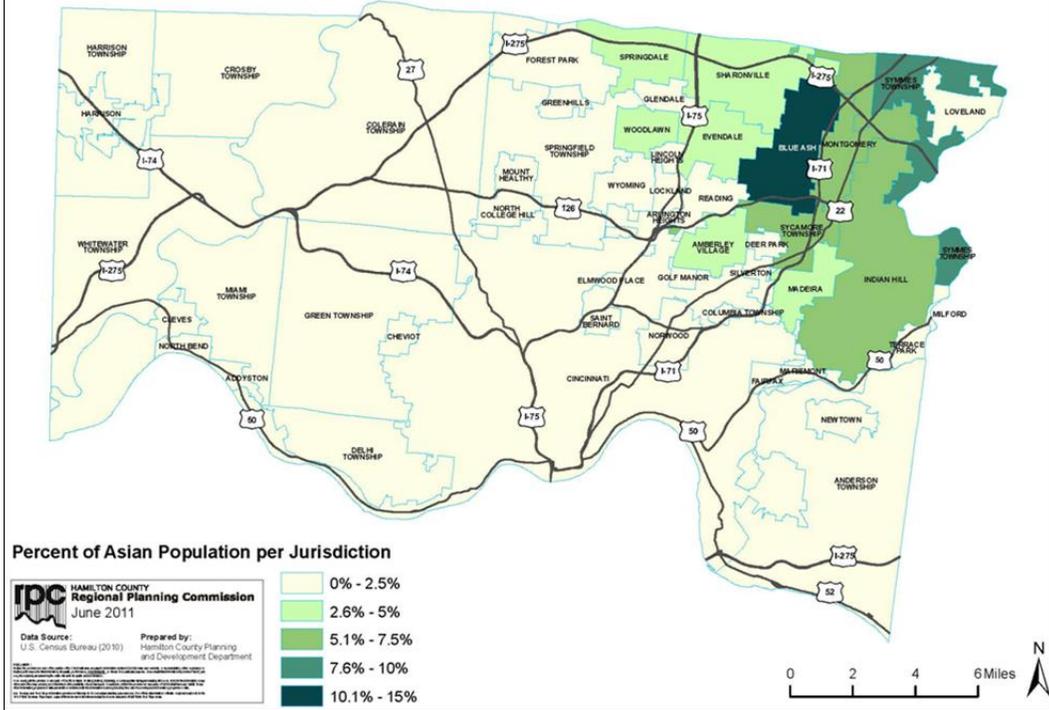
Jurisdiction	2010		2000		2000-2010
	Total Population	% Asian	Total Population	% Asian	% Change
Addyston Village	938	0.21%	1,010	0.40%	-50.00%
Amberley Village	3,585	3.01%	3,425	2.39%	31.71%
Anderson Township	43,446	1.96%	43,857	1.66%	17.49%
Arlington Heights Village	745	0.40%	899	0.00%	300.00%
Blue Ash City	12,114	10.62%	12,513	6.39%	60.75%
Cheviot City	8,375	0.54%	9,015	0.60%	-16.67%
Cincinnati City	296,943	1.83%	331,285	1.54%	6.57%
Cleves Village	3,234	0.37%	2,790	0.14%	200.00%
Colerain Township	58,499	1.17%	60,144	1.01%	12.99%
Columbia Township	4,532	1.43%	4,619	1.19%	18.18%
Crosby Township	2,767	0.18%	2,748	0.15%	25.00%
Deer Park City	5,736	1.34%	5,982	0.69%	87.80%
Delhi Township	29,510	1.07%	30,104	1.08%	-3.07%
Elmwood Place Village	2,188	0.73%	2,681	0.19%	220.00%

Jurisdiction	2010		2000		2000-2010
	Total Population	% Asian	Total Population	% Asian	% Change
Evendale Village	2,767	4.30%	3,090	5.34%	-27.88%
Fairfax Village	1,699	0.82%	1,938	1.08%	-33.33%
Forest Park City	18,720	2.15%	19,463	3.66%	-43.62%
Glendale Village	2,155	1.48%	2,188	0.69%	113.33%
Golf Manor Village	3,611	0.25%	3,999	0.70%	-67.86%
Green Township	58,370	0.99%	55,660	0.59%	76.38%
Greenhills Village	3,615	0.83%	4,103	0.37%	100.00%
Harrison City	9,897	0.62%	7,487	0.39%	110.34%
Harrison Township	4,037	0.32%	4,982	0.18%	44.44%
Lincoln Heights Village	3,286	0.03%	4,113	0.02%	0.00%
Lockland Village	3,449	0.14%	3,707	0.46%	-70.59%
Loveland City*	9,348	1.71%	9,561	1.18%	41.59%
Madeira City	8,726	2.77%	8,923	1.89%	43.20%
Mariemont Village	3,403	1.26%	3,408	0.76%	65.38%
Miami Township	10,728	0.40%	9,093	0.22%	115.00%
Milford City*	29	0.00%	35	0.00%	0.00%
Montgomery City	10,251	5.55%	10,163	3.22%	74.01%
Mount Healthy City	6,098	0.69%	7,149	0.49%	20.00%
Newtown Village	2,672	1.57%	2,420	0.83%	110.00%
North Bend Village	857	0.47%	603	0.00%	400.00%
North College Hill City	9,397	0.56%	10,082	0.24%	120.83%
Norwood City	19,207	0.77%	21,675	0.77%	-10.84%

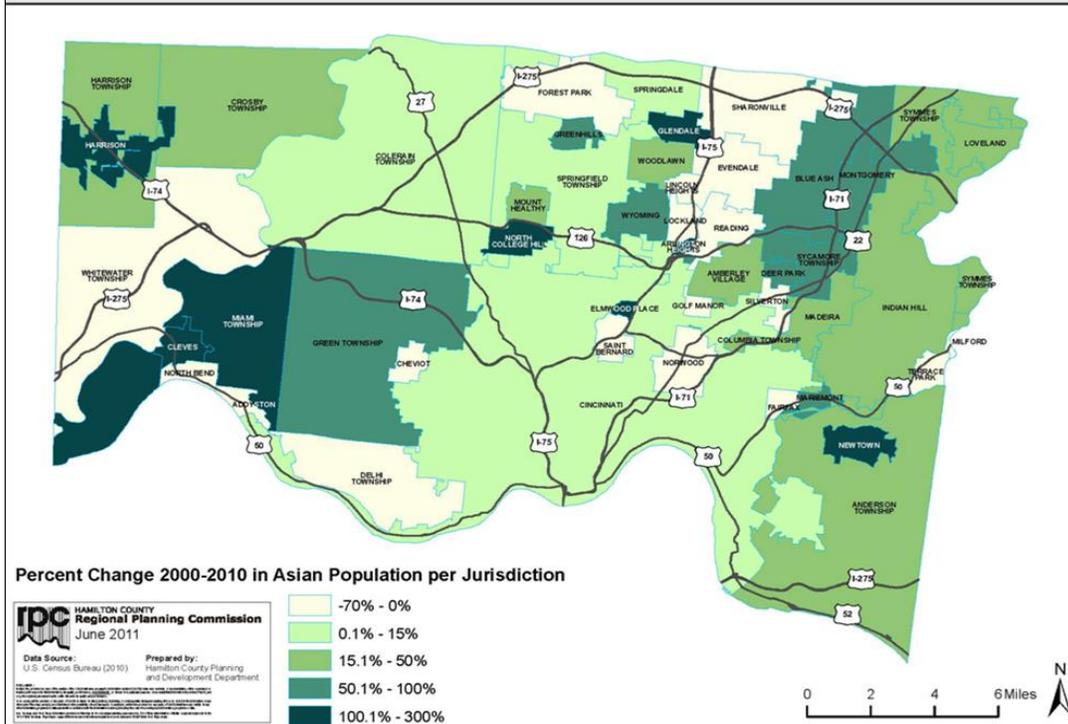
Jurisdiction	2010		2000		2000-2010
	Total Population	% Asian	Total Population	% Asian	% Change
Reading City	10,385	0.96%	11,292	1.18%	-24.81%
Saint Bernard City	4,368	0.71%	4,924	0.63%	0.00%
Sharonville City*	11,197	4.15%	11,578	4.13%	-2.72%
Silverton City	4,788	0.79%	5,178	0.81%	-9.52%
Springdale City	11,223	2.73%	10,563	2.53%	14.61%
Springfield Township	36,319	1.06%	37,587	0.92%	11.24%
Sycamore Township	19,200	6.56%	19,675	4.10%	56.13%
Symmes Township	14,683	9.24%	14,771	6.42%	42.89%
Terrace Park Village	2,251	0.36%	2,273	0.57%	-38.46%
The Village of Indian Hill City	5,785	5.74%	5,907	3.88%	44.98%
Whitewater Township	5,519	0.14%	5,564	0.14%	0.00%
Woodlawn Village	3,294	2.85%	2,816	2.38%	40.30%
Wyoming City	8,428	2.14%	8,261	1.36%	60.71%
<b>HAMILTON COUNTY</b>	<b>802,374</b>	<b>2.00%</b>	<b>845,303</b>	<b>1.60%</b>	<b>18.85%</b>

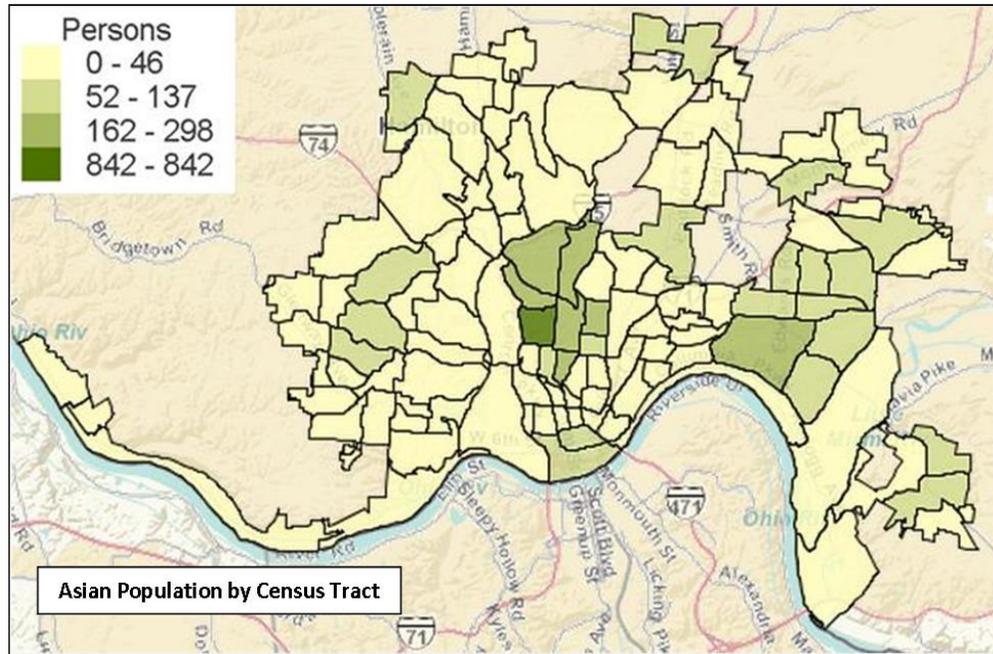
Three maps below show the distribution of the Asian population in Hamilton County. The 2010 Census is outlined in the map “Asian Population by Census Tract.” The average percent of Asian population per tract increased very slightly from 2000.

# HAMILTON COUNTY 2010 CENSUS DATA



# HAMILTON COUNTY 2010 CENSUS DATA





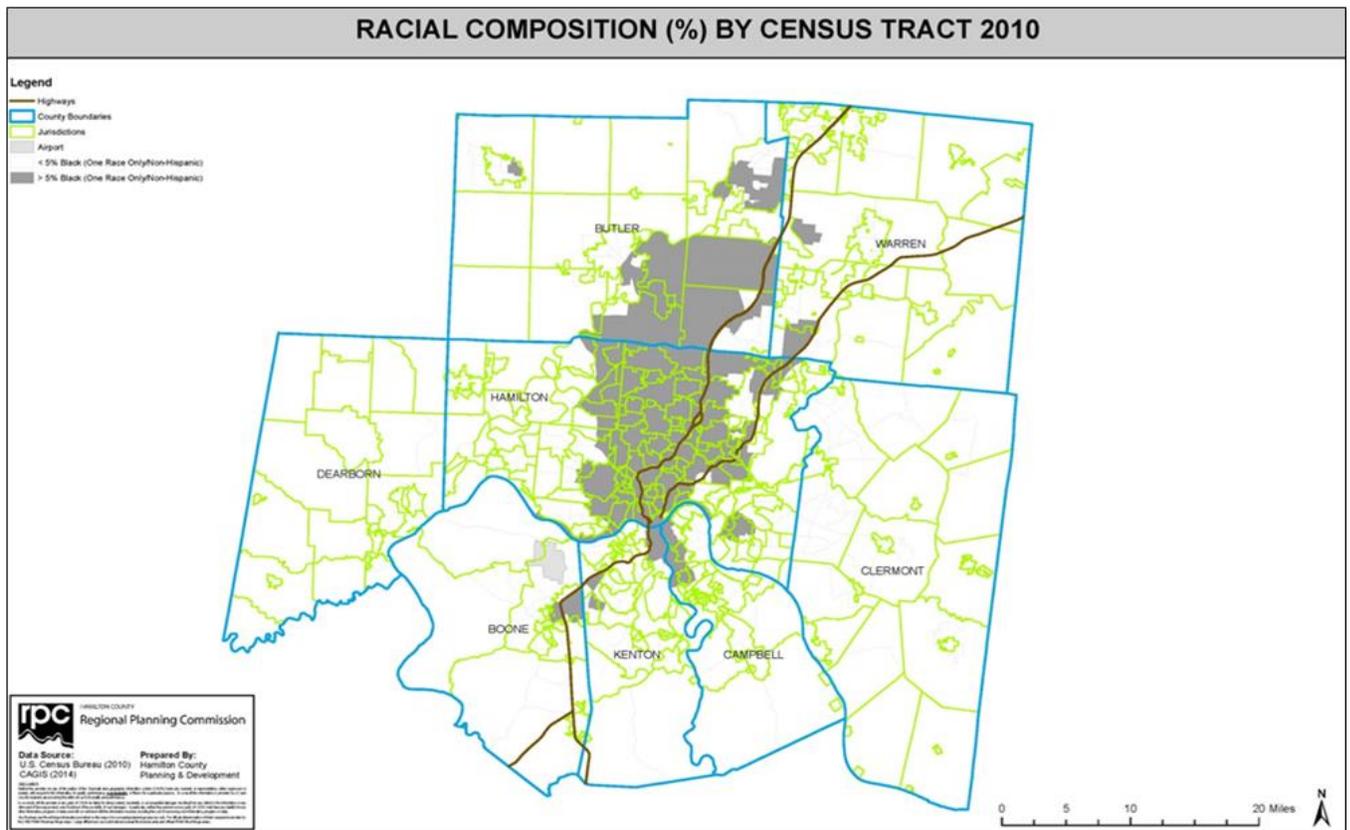
City of Cincinnati, 2010

### Asian Population in Cincinnati

Census data depicted in the map indicate that census tract 29 in the University Heights neighborhood contain the greatest Asian population by a significant margin. It should be noted that this tract, and those nearby, surround the University of Cincinnati and contain 1,294 Asian students enrolled as of the 2013-2014 school year (<https://www.uc.edu/about/ucfactsheet.html>). Many of these students likely live near the university, explaining the concentration of Asian population in this area.

### RACIAL INTEGRATION

The Cincinnati Metropolitan Area is made up of eight counties — Hamilton, Butler, Warren and Clermont counties in Ohio, Dearborn County in Indiana and Boone, Kenton and Campbell counties in Kentucky. The central core of the region, as indicated in the dark areas of the map, “Racial Composition (%) by Census Tract 2010,” is racially integrated or primarily African American. The white areas indicate communities with almost no African American residents, less than 5% of the population.



## PEOPLE WITH DISABILITIES

The Census Bureau defines “disability” as a lasting physical, mental or emotional condition that makes it difficult for a person to conduct the daily activities of living or impedes him or her from being able to go outside the home alone or to work. (*United States Census Bureau, <http://www.census.gov/people/disability/methodology/acs.html>*)

Among all persons age 5 years or older, Hamilton County had a total disability rate of 17.9 percent in 2000, just below the 19 percent national rate at that time. This disability rate represented 139,082 persons living with a disability in the County, including 9,294 persons between the 5 and 15 and 42,427 persons 65 or older. The 2010 Census showed the total disability rate decreased to 12.7 percent, and the disability rates for subsets of the population, including children and the elderly, also decreased. The data is displayed in the “Disability by Age” table.

<b>Disability by Age</b>						
Hamilton County: 2000 and 2010 Census Data						
<b>Age</b>	<b>City of Cincinnati</b>		<b>Remainder of County</b>		<b>Hamilton County</b>	
	Disabled Persons	Disability Rate	Disabled Persons	Disability Rate	Disabled Persons	Disability Rate
<b>2000 Census</b>						
<b>5 to 15</b>	4,158	8.5%	5,136	5.8%	9,294	6.8%
<b>16 to 64</b>	44,686	20.9%	42,675	13.3%	87,361	16.4%
<b>65-plus</b>	17,255	45.6%	25,172	36.4%	42,427	39.6%
<b>Total</b>	66,099	22.0%	72,983	15.3%	139,082	17.9%
<b>2010 Census</b>						
<b>5 to 17</b>	2,780	6.5%	3,343	3.6%	6,123	4.5%
<b>18 to 64</b>	24,048	12.4%	24,564	8.1%	48,612	9.8%
<b>65-plus</b>	12,329	41.7%	26,336	35.7%	38,665	37.4%
<b>Total</b>	39,157	14.7%	54,243	11.6%	93,400	12.7%

The City of Cincinnati has 36,377 (18 and older) adults and 2,780 children (17 and younger) with one or more disabilities. (Source: U.S. Census Bureau, 2012) According to the 2012 American Community Survey, in Ohio, 31.8% of non-institutionalized persons ages 21 to 64 who have a disability, were living below the poverty line. (Source: Disability Statistics from the 2012 American Community Survey, Cornell University Employment and Disability Institute).

The Hamilton County Board of Developmental Disabilities (HCBDD) found that just 170 of the 6,782 individuals served by the organization receive a Housing Choice Voucher or Project Based Rental Assistance. As of February 2014, an additional 80 individuals served by the HCBDD were on the Cincinnati Metropolitan Housing Authority’s waiting list. The HCBDD estimates that the total number of individuals served by their organization who are income-eligible for housing assistance but not receiving assistance or not on the waiting list at 2,839.

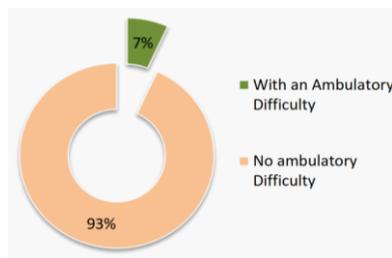
A subset of disability that has a strong relationship to housing needs is “ambulatory difficulty,” which is defined as a serious difficulty walking or climbing stairs. Information is listed on the “Hamilton County Population by Ambulatory Difficulty” table.

# Hamilton County Population By Ambulatory Difficulty

ACS Definition of "Ambulatory Difficulty": Having serious difficulty walking or climbing stairs (DPHY)

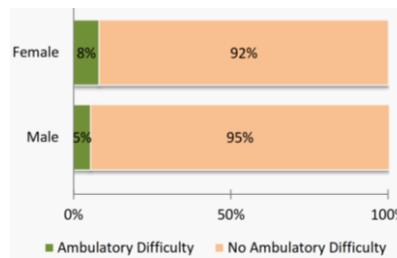
## COUNTYWIDE

	With AD	No AD
Population	50,611	687,772



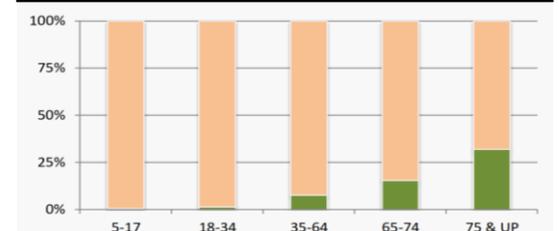
## PERCENT BY SEX

Gender	M	F
Ambulatory Difficulty	5%	8%



## BY AGE

Age	5-17	18-24	35-64	65-74	75+
Number	764	2,597	23,388	8,145	15,717
Percent	.56	1.37	7.53	15.45	32%



## PERCENT OF POPULATION WITH AMBULATORY DIFFICULTY — BY MUNICIPALITY

Amberley village, Hamilton County, Ohio	3.3%	Forest Park city, Hamilton County, Ohio	8.0%	Newtown village, Hamilton County, Ohio	5.1%
Anderson township, Hamilton County, Ohio	4.7%	Glendale village, Hamilton County, Ohio	3.5%	North College Hill city, Hamilton County, Ohio	6.3%
Arlington Heights village, Hamilton County, Ohio	6.2%	Golf Manor village, Hamilton County, Ohio	9.3%	Norwood city, Hamilton County, Ohio	8.4%
Blue Ash city, Hamilton County, Ohio	5.6%	Green township, Hamilton County, Ohio	5.7%	Reading city, Hamilton County, Ohio	9.5%
Cheviot city, Hamilton County, Ohio	11.8%	Greenhills village, Hamilton County, Ohio	5.6%	St. Bernard city, Hamilton County, Ohio	5.6%
Cincinnati city, Hamilton County, Ohio	8.3%	Harrison township, Hamilton County, Ohio	4.8%	Sharonville city, Hamilton County, Ohio	7.0%
Colerain township, Hamilton County, Ohio	5.5%	Lincoln Heights village, Hamilton County, Ohio	9.0%	Silverton city, Hamilton County, Ohio	6.4%
Columbia township, Hamilton County, Ohio	5.7%	Lockland village, Hamilton County, Ohio	5.4%	Springdale city, Hamilton County, Ohio	7.6%
Crosby township, Hamilton County, Ohio	5.8%	Loveland city, Hamilton County, Ohio	6.7%	Springfield township, Hamilton County, Ohio	6.9%
Deer Park city, Hamilton County, Ohio	9.3%	Madeira city, Hamilton County, Ohio	2.2%	Sycamore township, Hamilton County, Ohio	5.6%
Delhi township, Hamilton County, Ohio	6.1%	Mariemont village, Hamilton County, Ohio	3.2%	Symmes township, Hamilton County, Ohio	3.2%
Elmwood Place village, Hamilton County, Ohio	13.2%	Miami township, Hamilton County, Ohio	6.3%	Terrace Park village, Hamilton County, Ohio	1.5%
Evendale village, Hamilton County, Ohio	4.4%	Milford city, Hamilton County, Ohio	0.0%	The Village of Indian Hill city, Hamilton County	1.6%
Fairfax village, Hamilton County, Ohio	5.8%	Montgomery city, Hamilton County, Ohio	4.5%	Whitewater township, Hamilton County, Ohio	10.1%
Fairfield city, Hamilton County, Ohio	0.0%	Mount Healthy city, Hamilton County, Ohio	8.7%	Woodlawn village, Hamilton County, Ohio	5.5%
				Wyoming city, Hamilton County, Ohio	3.4%

B18105 reports (0) counts of population for all cohorts for Fairfield

B18105 exhibits a possible error on the population counts for Milford (33

Source: ACS 2008-2012 5-year estimates. Table B18105.

COUNTYWIDE	ESTIMATE	ERROR
Total:	738,383	+/-648
Male:	352,671	+/-400
5 to 17 years:	69,100	+/-78
With an ambulatory difficulty	480	+/-144
No ambulatory difficulty	68,620	+/-152
18 to 34 years:	93,292	+/-226
With an ambulatory difficulty	1,428	+/-321
No ambulatory difficulty	91,864	+/-404
35 to 64 years:	148,530	+/-258
With an ambulatory difficulty	9,486	+/-701
No ambulatory difficulty	139,044	+/-719
65 to 74 years:	23,365	+/-160
With an ambulatory difficulty	2,985	+/-344
No ambulatory difficulty	20,380	+/-371
75 years and over:	18,384	+/-208
With an ambulatory difficulty	4,790	+/-304
No ambulatory difficulty	13,594	+/-339
Female:	385,712	+/-483
5 to 17 years:	66,844	+/-44
With an ambulatory difficulty	284	+/-92
No ambulatory difficulty	66,560	+/-101
18 to 34 years:	96,867	+/-107
With an ambulatory difficulty	1,169	+/-243
No ambulatory difficulty	95,698	+/-272
35 to 64 years:	161,897	+/-145
With an ambulatory difficulty	13,902	+/-691
No ambulatory difficulty	147,995	+/-728
65 to 74 years:	29,352	+/-174
With an ambulatory difficulty	5,160	+/-336
No ambulatory difficulty	24,192	+/-353
75 years and over:	30,752	+/-394
With an ambulatory difficulty	10,927	+/-504
No ambulatory difficulty	19,825	+/-546

## FAMILIES WITH CHILDREN

Making up nearly a quarter of the county's residents, the population younger than 18 years of age is the second largest demographic group with 189,640 (23.63%) children in the county. In the City of Cincinnati, that population represents 22.13% of residents or 65,706 children.

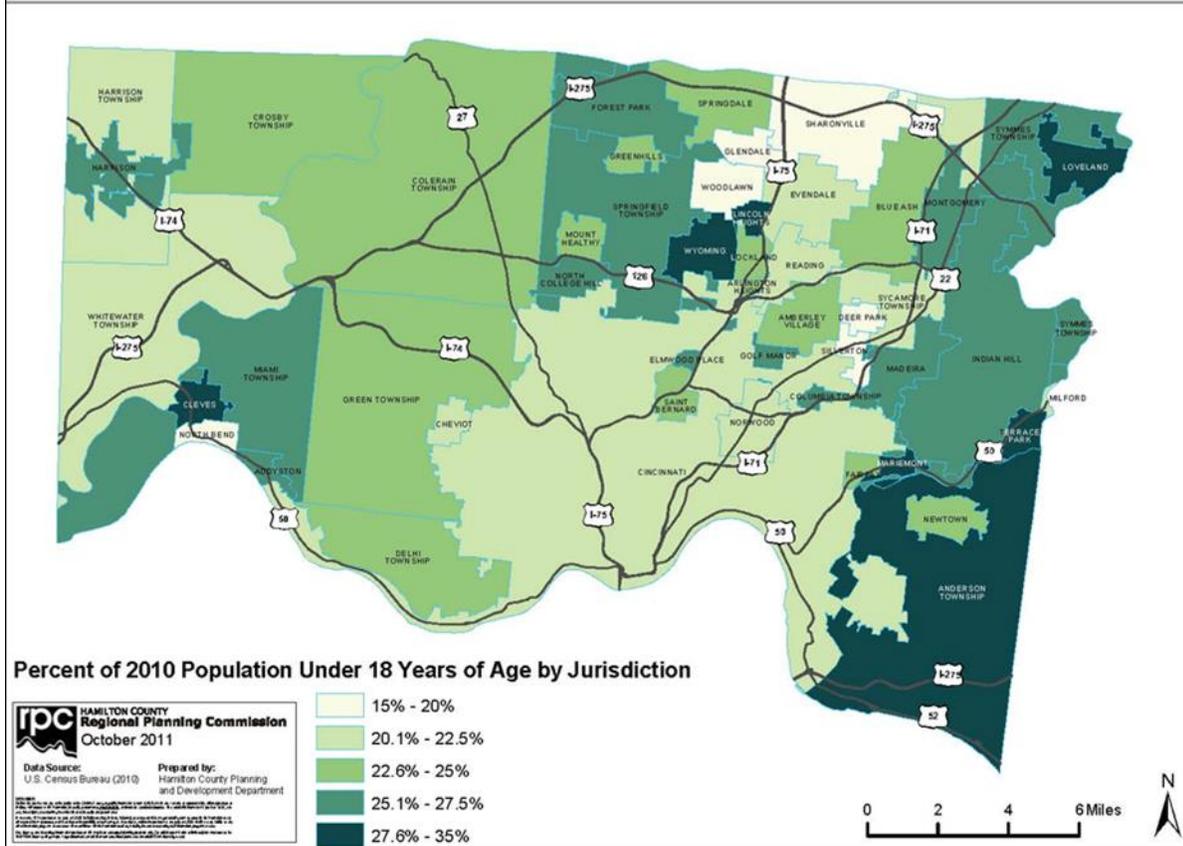
Jurisdiction	2010		2000		2000-2010
	Total Population	% Under 18 Years of Age	Total Population	% Under 18 Years of Age	% Change
Addyston Village	938	25.27%	1,010	31.68%	-25.94%
Amberley Village	3,585	24.04%	3,425	22.98%	9.53%
Anderson Township	43,446	27.78%	43,857	29.53%	-6.82%
Arlington Heights Village	745	23.09%	899	24.92%	-23.21%
Blue Ash City	12,114	22.70%	12,513	25.45%	-13.63%
Cheviot City	8,375	21.83%	9,015	22.41%	-9.50%
Cincinnati City	296,943	22.13%	331,285	24.49%	-19.03%
Cleves Village	3,234	32.47%	2,790	31.40%	19.86%
Colerain Township	58,499	25.00%	60,144	27.28%	-10.89%
Columbia Township	4,532	26.04%	6,557	27.74%	-35.13%
Crosby Township	2,767	23.82%	2,748	25.66%	-6.52%
Deer Park City	5,736	18.76%	5,982	21.78%	-17.42%
Delhi Township	29,510	24.81%	30,104	27.78%	-12.44%
Elmwood Place Village	2,188	26.55%	2,681	29.21%	-25.80%
Evendale Village	2,767	20.64%	3,090	28.38%	-34.89%
Fairfax Village	1,699	24.43%	1,938	26.68%	-19.73%
Forest Park City	18,720	26.86%	19,463	27.11%	-4.70%
Glendale Village	2,155	19.58%	2,188	19.61%	-1.63%
Golf Manor Village	3,611	26.11%	3,999	25.56%	-7.73%
Green Township	58,370	23.27%	55,660	25.65%	-4.85%
Greenhills Village	3,615	23.85%	4,103	26.25%	-19.96%
Harrison City	9,897	26.18%	7,487	29.95%	15.57%
Harrison Township	4,037	20.31%	4,982	26.62%	-38.16%
Lincoln Heights Village	3,286	30.58%	4,113	34.23%	-28.62%
Lockland Village	3,449	23.80%	3,707	24.04%	-7.86%
Loveland City*	9,348	28.11%	9,561	29.59%	-7.10%
Madeira City	8,726	25.62%	8,923	26.73%	-6.25%
Mariemont Village	3,403	28.24%	3,408	26.85%	5.03%
Miami Township	10,728	26.02%	9,093	31.00%	-0.99%
Milford City*	29	20.69%	35	34.29%	200.00%
Montgomery City	10,251	25.34%	10,163	28.13%	-9.13%
Mount Healthy City	6,098	22.94%	7,149	24.00%	-18.47%
Newtown Village	2,672	24.48%	2,420	27.15%	-0.46%
North Bend Village	857	15.87%	603	22.22%	1.49%
North College Hill City	9,397	25.26%	10,082	25.47%	-7.55%

Jurisdiction	2010		2000		2000-2010
	Total Population	% Under 18 Years of Age	Total Population	% Under 18 Years of Age	% Change
Norwood City	19,207	20.19%	21,675	23.40%	-23.54%
Reading City	10,385	21.61%	11,292	22.48%	-11.62%
Saint Bernard City	4,368	23.63%	4,924	25.39%	-17.44%
Sharonville City*	11,197	19.95%	11,578	20.60%	-6.33%
Silverton City	4,788	15.94%	5,178	18.85%	-21.82%
Springdale City	11,223	22.64%	10,563	23.96%	0.40%
Springfield Township	36,319	25.42%	37,587	27.75%	-11.50%
Sycamore Township	19,200	21.33%	19,675	23.35%	-10.84%
Symmes Township	14,683	26.92%	14,771	30.38%	-11.92%
Terrace Park Village	2,251	34.96%	2,273	35.64%	-2.84%
The Village of Indian Hill City	5,785	27.04%	5,907	30.27%	-12.53%
Whitewater Township	5,519	22.45%	5,564	27.91%	-20.22%
Woodlawn Village	3,294	18.88%	2,816	22.27%	-0.80%
Wyoming City	8,428	29.65%	8,261	30.58%	-1.07%
<b>HAMILTON COUNTY</b>	<b>802,374</b>	<b>23.63%</b>	<b>845,303</b>	<b>25.81%</b>	<b>-13.08%</b>

Although this population is one of the largest in both the County and Cincinnati, the population declined over the past decade with a loss of 28,534 (13.08%) across the County and a loss of 15,438 (19.03%) in the City. Only six jurisdictions saw increases in the population of children during the past decade: Amberley Village, Cleves, Harrison, Mariemont, Northbend and Springdale.

The largest concentrations of children are found in Terrace Park Village (34.96%), Cleves Village (32.47%), and Lincoln Heights Village (30.58%).

# HAMILTON COUNTY 2010 CENSUS DATA



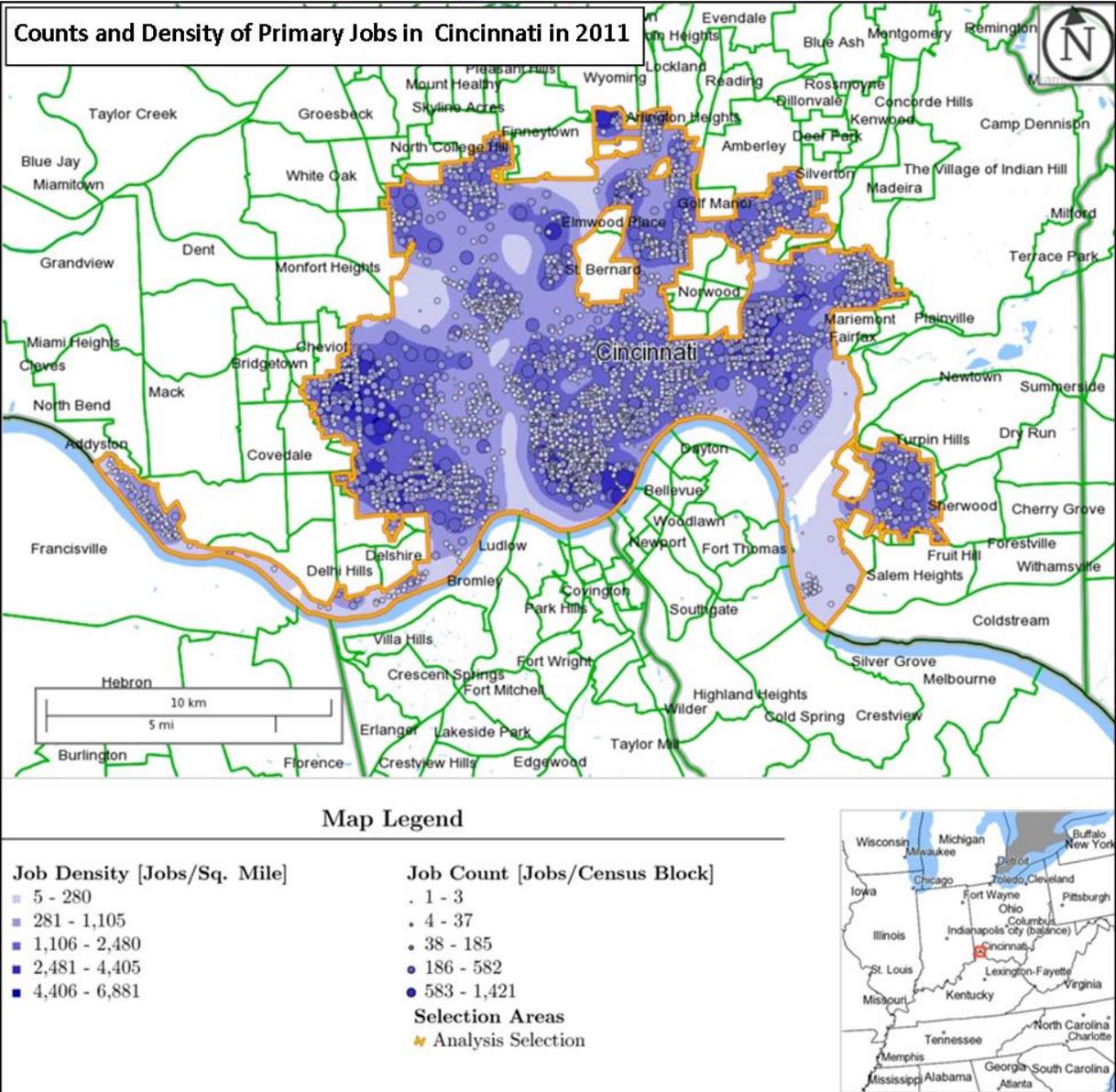
## EMPLOYMENT CENTERS

Hamilton County’s share of employment in many industries declined from 1969 to 2010; however, in 2010, several of the region’s largest employers were within the County and many were in the City of Cincinnati.

The Business Courier of Cincinnati reported on the number of jobs per employer, and many of these large employers were in the retail, education and health or social services sectors as well as in government. The table, “Major Employers in Hamilton County,” provides specific numbers.

Major Employers in Hamilton County 2010 Business Courier Book of Lists Data	
Company	Employees
Kroger Company	17,000
University of Cincinnati	15,340
Procter & Gamble Co.	13,000
Cincinnati Children’s Hospital Medical	11,385

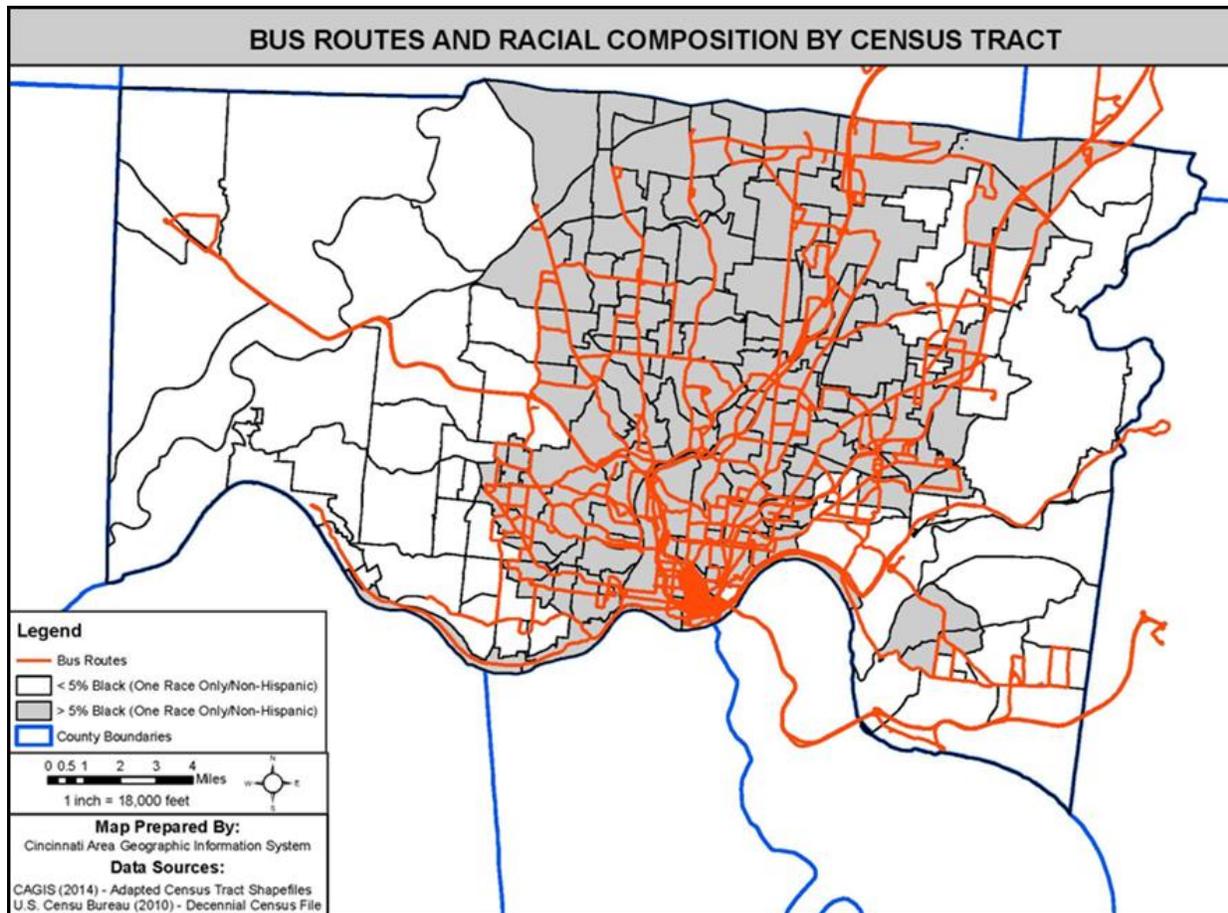
Health Alliance of Greater Cincinnati	10,000
TriHealth Inc.	9,875
Archdiocese of Cincinnati	8,000
Walmart Stores	7,375
Mercy Health Partners Southwest	7,316
Fifth Third Bancorp	7,219
GE Aviation	7,200
U.S. Postal Service	5,842
Hamilton County	5,646
Internal Revenue Service	5,500
City of Cincinnati	5,322
Staffmark staffing company	4,899
Frisch's Restaurants	4,800
Cincinnati Public Schools	4,772
Macy's Inc.	4,700



Source: U.S. Census Bureau's OnTheMap: <http://onthemap.ces.census.gov> (6/18/2014)

## BUS ROUTES AND RACIAL COMPOSITION

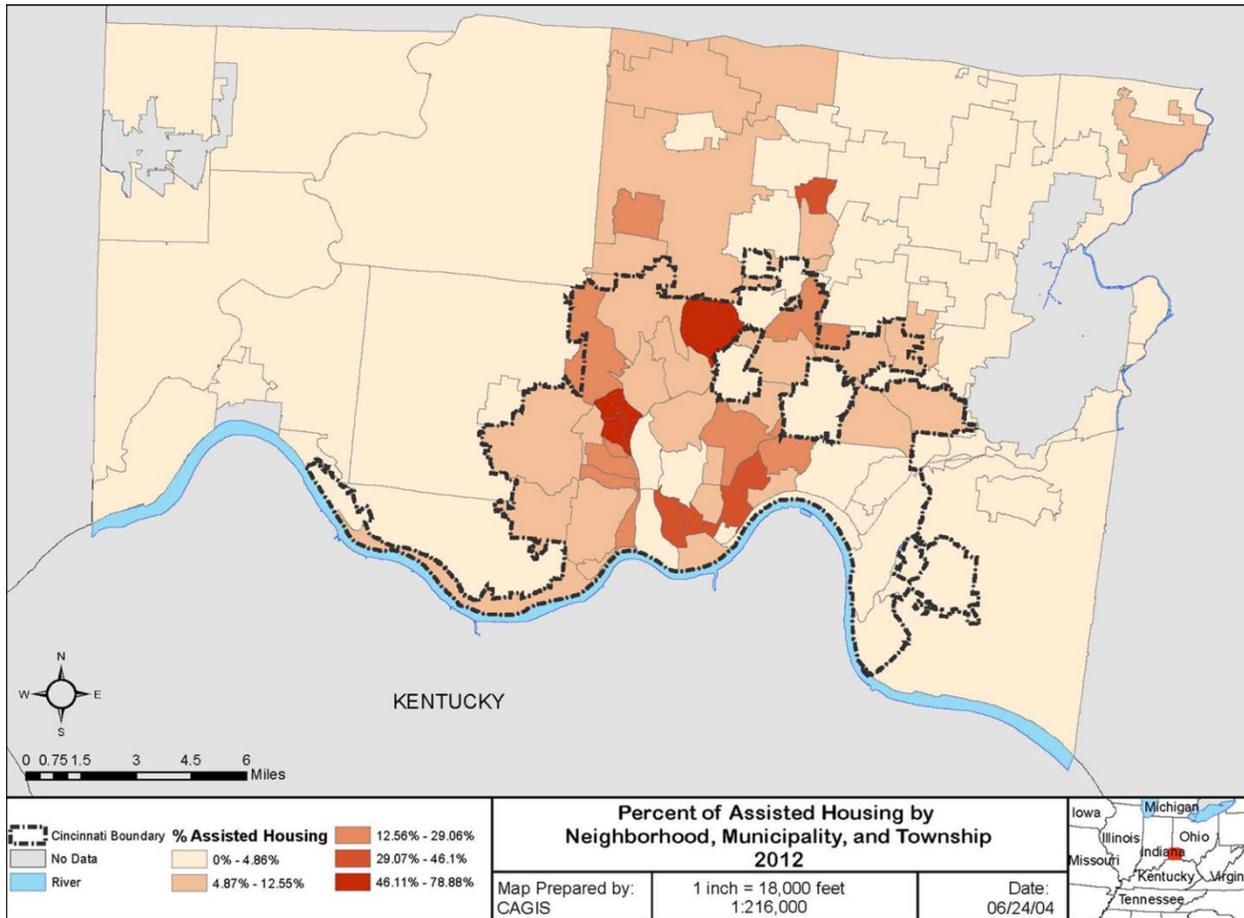
Most of the Metro system bus routes in Hamilton County are concentrated within the City of Cincinnati, and in particular, are assembled in the central portion of the City. The map, “Bus Routes and Racial Composition by Census Tract,” shows that the majority of areas containing a greater than 5% African American population are accessible to a bus line. It could be inferred from the map that areas that are less frequented or not reached by bus routes (also the areas containing less than a 5% concentration of a African American population) are more suburban in nature and where personal vehicles are likely more readily available.



## DISTRIBUTION OF ASSISTED HOUSING

Public or assisted housing can exist in several forms such as low-income housing projects, housing choice voucher programs, and supportive housing. The objective of public and other forms of assisted housing is to provide housing that is suitable for persons with special needs or families of low- to moderate-income levels and to promote access to jobs, transportation and services. As the map “Percent of Assisted Housing by Neighborhood, Municipality and Township” shows, assisted housing is in place in all Cincinnati neighborhoods as well as in all Hamilton County cities and townships. Overall,

7.4% of households in Hamilton County, including Cincinnati, receive some type of public housing assistance.



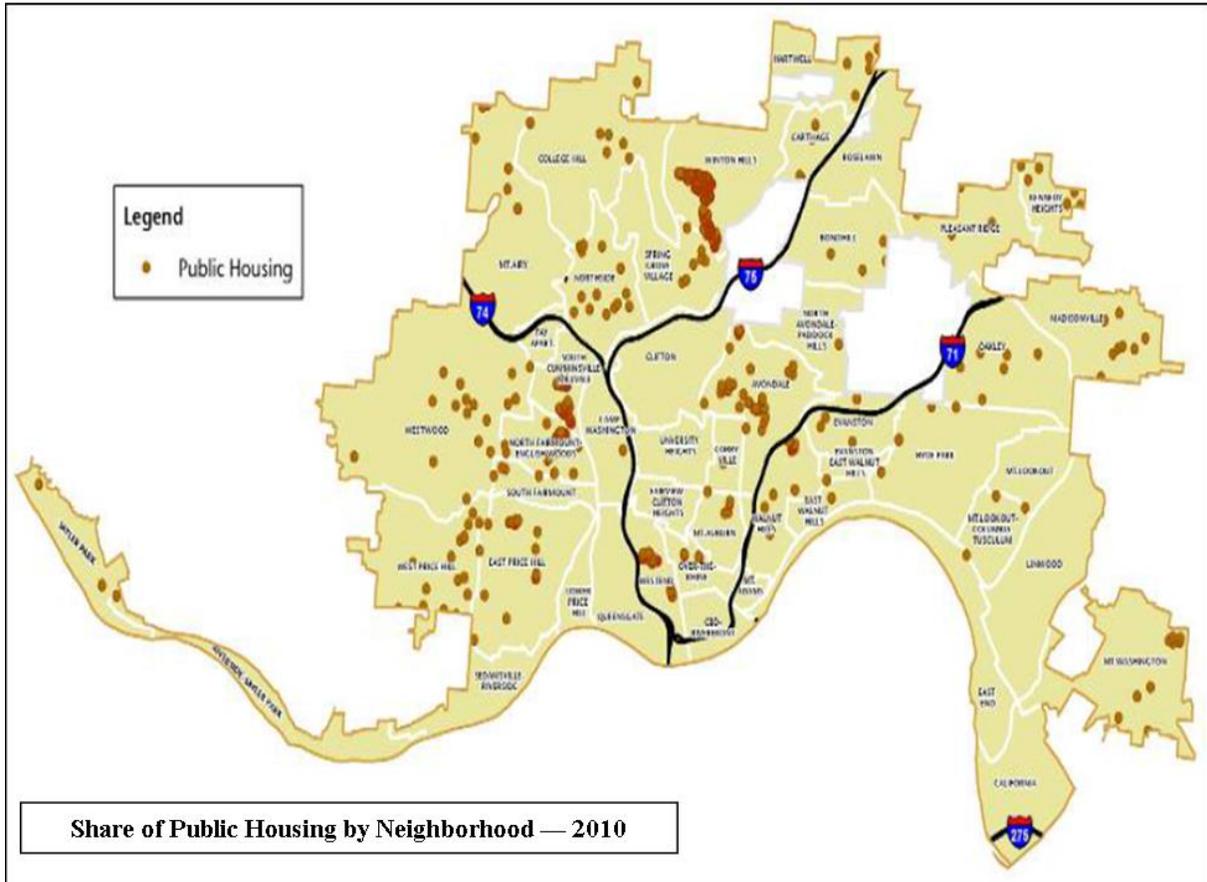
**Assisted Housing Units as Percentage of All Housing By Neighborhood**

Neighborhood	Assisted Units as % of Housing
Roll Hill (Fay Apts)	79%
Winton Hills	75%
S. Cumminsville/Millvale	57%
West End	46%
Over- the- Rhine	39%
Walnut Hills	36%
Avondale	29%
Lower Price Hill	25%
Roselawn	24%
Mt. Airy	21%
N. Fairmount/English Woods	19%
S. Fairmount	18%

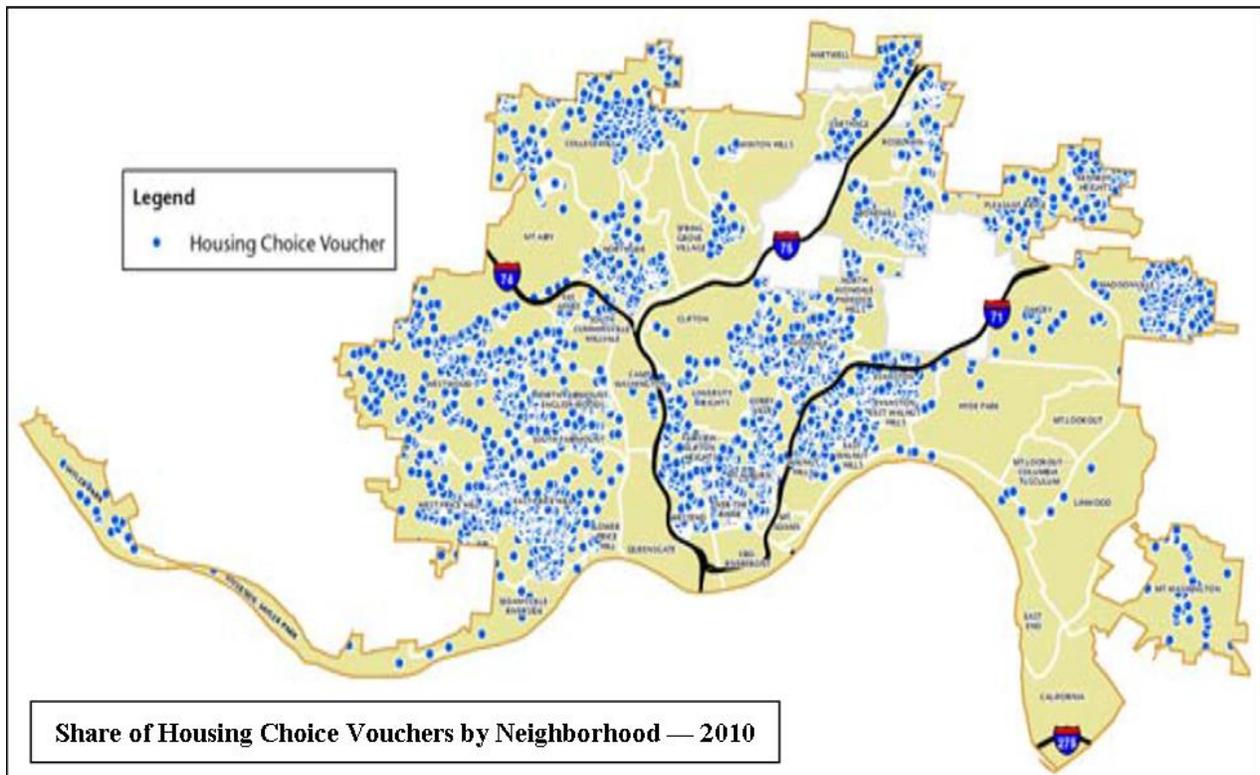
<b>Neighborhood</b>	<b>Assisted Units as % of Housing</b>
Evanston	17%
College Hill	13%
East Price Hill	12%
Madisonville	12%
Sedamsville	12%
Mt. Auburn	10%
North Avondale/Paddock Hills	9%
West Price Hill	8%
Westwood	8%
Pleasant Ridge	8%
East Walnut Hills	7%
Riverside	7%
Downtown	7%
Kennedy Heights	7%
Northside	7%
Bond Hill	7%
Spring Grove Village	7%
Clifton	6%
Corryville	5%
Oakley	5%
Camp Washington	5%
Mt. Washington	4%
Carthage	3%
Fairview	3%
Hartwell	2%
Sayler Park	2%
University Heights	2%
East End	2%
Linwood	1%
Mt. Lookout	1%
Hyde Park	1%
California	0%
Columbia Tusculum	0%
Mt. Adams	0%
Queensgate	0%

Source: US Department of Housing and Urban Development, Cincinnati Field Office, January 2013

While there is a trend toward deconcentration of assisted housing from a few City neighborhoods into more jurisdictions within the County, the majority remains within the City. Cincinnati has 13.4% of its households received assistance whereas the County has just 2.9%. According to HUD reports, public housing tenants in Hamilton County are 91% African American, and those with Housing Choice Vouchers are 89% African American. (Sources: Cincinnati Metropolitan Housing Authority and the Plan Cincinnati.)



Source: Cincinnati Metropolitan Housing Authority and PLAN Cincinnati 2011 Housing Market Study



Source: Cincinnati Metropolitan Housing Authority and PLAN Cincinnati 2011 Housing Market Study

Tables with historical data of assisted housing in Hamilton County and Cincinnati are listed on the following pages. Data has been supplied by the US Department of Housing and Urban Development.

A summary of the number of assisted housing units in Cincinnati and Hamilton County from 2005 to 2012 is listed below:

**Number of Assisted Housing Units - 2005 to 2012**

	2005	2006	2007	2008	2009	2010	2011	2012	% Change	Assisted Units as % of All Housing Units (2012)
City	19,600	18,750	18,555	19,428	19,351	19,569	19,761	20,083	2%	13%
County	4,554	4,638	4,854	5,423	5,501	5,438	5,534	5,675	25%	3%
All	24,154	23,388	23,409	24,851	24,852	25,007	25,295	25,787	7%	7%

**Assisted Housing by City of Cincinnati Neighborhood, December 2012**

<b>Neighborhood</b>	<b>Tenant Vouchers</b>	<b>Project Vouchers</b>	<b>Public Housing</b>	<b>CMHA Aff Housing</b>	<b>Continuum of Care</b>	<b>Total Assisted</b>	<b>Assisted Units as % of Total Housing</b>
Avondale	466	897	591	3	48	2,002	29%
Bond Hill	250	0	3	0	22	275	7%
California	0	0	0	0	1	1	0%
Camp Washington	22	0	2	0	2	26	5%
Carthage	35	0	0	0	2	37	3%
Clifton	51	182	0	0	28	261	6%
College Hill	463	198	18	1	35	714	13%
Columbia Tusculum	0	0	0	0	2	2	0%
Corryville	73	0	1	0	26	100	5%
East End	9	0	1	0	1	11	2%
East Price Hill	551	208	72	1	36	867	12%
East Walnut Hills	61	0	139	0	10	210	7%
Evanston	309	81	113	0	14	517	17%
Fairview	65	42	3	0	10	120	3%
Roll Hill (Fay Apts)	3	703	0	0	0	706	79%
Hartwell	51	0	12	0	1	64	2%
Hyde Park	6	0	27	0	3	36	1%
Kennedy Heights	121	39	6	0	11	177	7%
Linwood	4	0	0	0	1	5	1%
Lower Price Hill	25	81	0	0	1	107	25%
Madisonville	263	287	23	0	6	579	12%
Mt. Adams	0	0	0	0	0	0	0%
Mt. Airy	682	64	16	0	23	785	21%
Mt. Auburn	147	79	9	0	24	259	10%
Mt. Lookout	0	0	9	0	0	9	1%
Mt. Washington	69	92	87	8	30	278	4%
N. Fairmount/ English Woods	73	0	264	0	0	337	19%
North Avondale/ Paddock Hills	126	24	12	0	52	214	9%
Northside	210	18	14	0	36	278	7%
Oakley	23	302	7	0	10	342	5%
Over- the- Rhine	337	824	28	0	206	1,395	39%
Pleasant Ridge	288	0	29	0	24	341	8%
Queensgate	0	0	0	0	0	0	0%
Downtown	0	104	0	0	3	107	7%

Neighborhood	Tenant Vouchers	Project Vouchers	Public Housing	CMHA Aff Housing	Continuum of Care	Total Assisted	Assisted Units as % of Total Housing
Riverside	3	44	0	0	0	47	7%
Roselawn	445	344	0	0	42	831	24%
S. Cumminsville /Millvale	36	251	529	0	2	818	57%
S. Fairmount	69	161	4	0	4	238	18%
Sayler Park	19	0	7	0	0	26	2%
Sedamsville	14	73	0	0	0	87	12%
Spring Grove Village	52	0	8	0	3	63	7%
University Heights	31	0	0	0	25	56	2%
Walnut Hills	249	806	283	0	53	1,391	36%
West End	258	645	933	14	9	1,845	46%
West Price Hill	379	0	208	0	60	647	8%
Westwood	1,012	189	44	0	113	1,358	8%
Winton Hills	102	149	1,261	0	2	1,514	75%

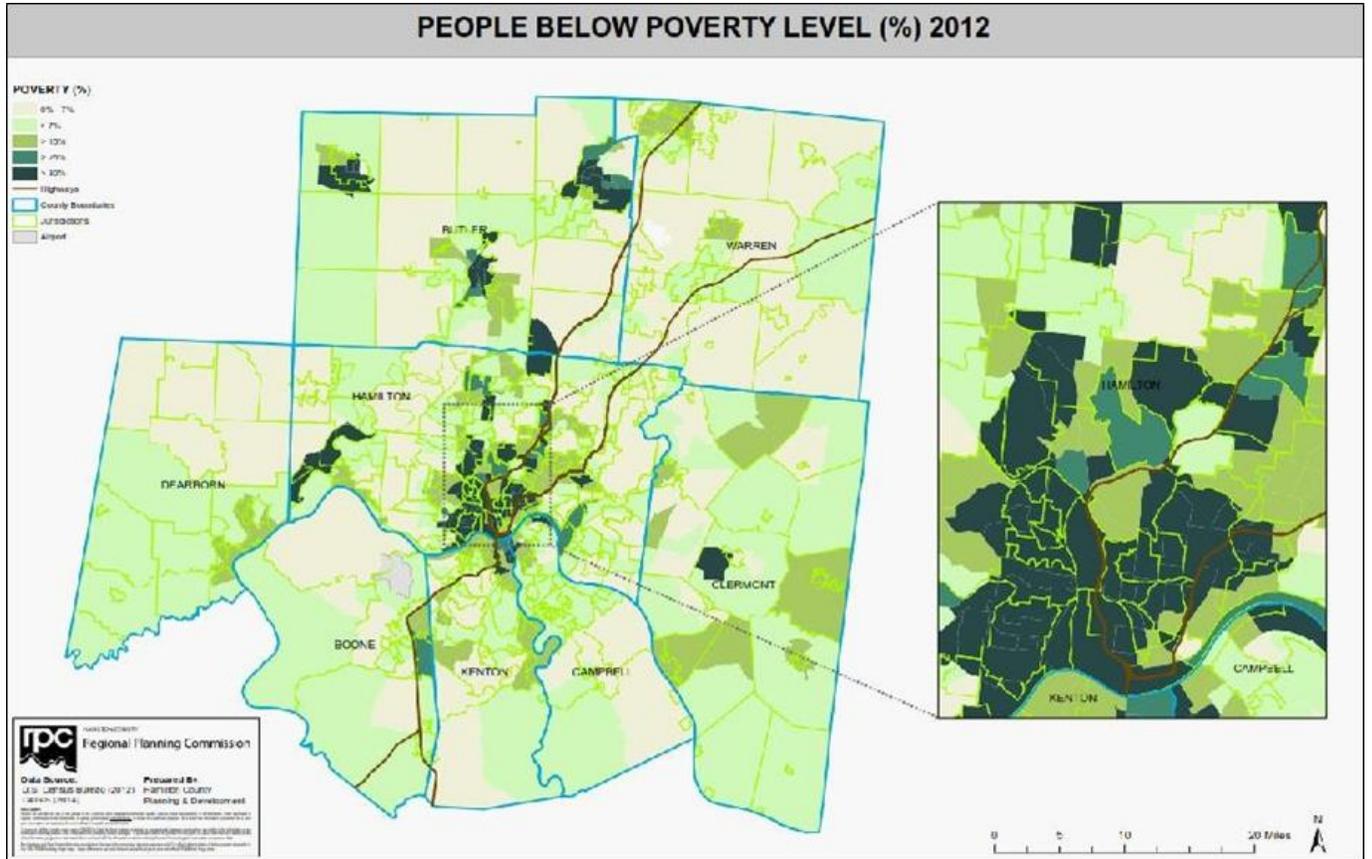
**Assisted Housing Units By Hamilton County Jurisdiction, December 2012**

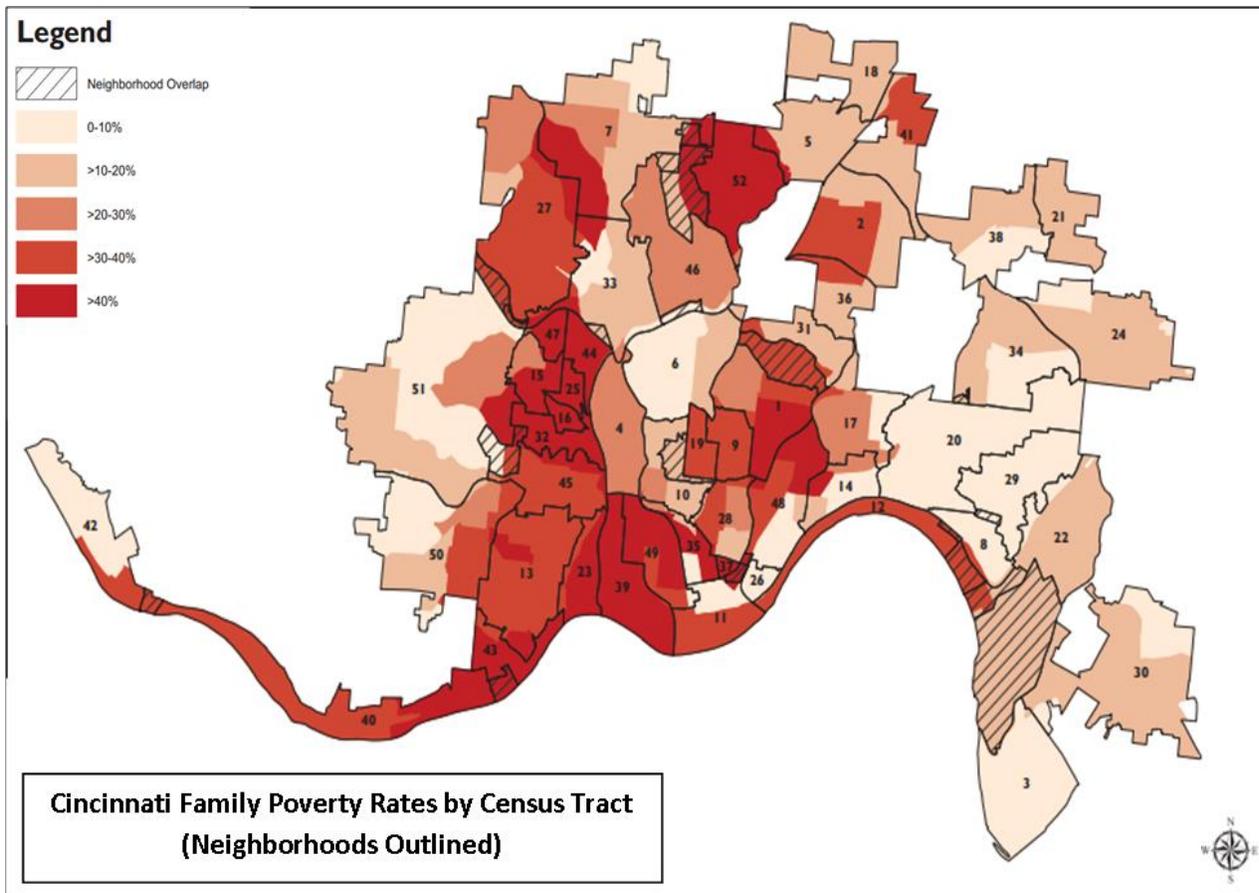
Neighborhood	Tenant Vouchers	Project Vouchers	Public Housing	CMHA Aff Housing	Continuum of Care	Total Assisted	Assisted Units as % of Total Housing
City of Cincinnati	7,452	6,887	4,763	27	981	20,083	13%
Amberly Village	0	0	0	0	0	0	0%
Anderson Twp	6	144	37	6	2	189	1%
Arlington Heights	11	0	5	0	2	18	5%
Blue Ash	24	0	23	0	0	47	1%
Cheviot	45	0	11	2	4	60	2%
Colerain Twp	583	96	51	10	9	739	3%
Columbia Twp	5	0	0	0	1	6	0%
Crosby Twp	1	0	0	0	0	1	0%
Deer Park	12	0	7	3	1	20	1%
Delhi Twp	37	73	30	7	3	143	1%
Elmwood Place	49	0	2	0	3	54	6%
Evandale	0	0	0	0	0	0	0%

<b>Neighborhood</b>	<b>Tenant Vouchers</b>	<b>Project Vouchers</b>	<b>Public Housing</b>	<b>CMHA Aff Housing</b>	<b>Continuum of Care</b>	<b>Total Assisted</b>	<b>Assisted Units as % of Total Housing</b>
Fairfax	1	0	3	2	0	4	1%
Forest Park	555	88	7	2	5	655	9%
Glendale	1	0	2	0	0	3	0%
Golf Manor	213	0	3	0	20	236	15%
Green Twp	67	12	27	9	2	108	0%
Greenhills	19	0	5	3	0	24	2%
Harrison Twp	13	0	7	1	1	21	0%
Lincoln Heights	124	206	77	0	1	408	32%
Lockland	75	54	9	1	0	138	9%
Loveland	26	211	4	0	1	242	7%
Madeira	1	0	10	0	0	11	0%
Mariemont	0	0	1	0	0	1	0%
Miami Twp/ Cleves/ Addyston	31	0	17	1	0	48	1%
Milford	0	0	0	0	0	0	0%
Montgomery	3	0	5	1	0	8	0%
Mt Healthy	113	225	4	1	1	343	13%
Newtown	0	0	5	1	0	5	0%
North College Hill	238	0	6	3	10	254	7%
Norwood	212	8	18	8	59	297	4%
Reading	36	50	12	5	6	104	2%
Sharonville	23	0	16	0	1	40	1%
Silverton	90	49	4	0	11	154	6%
Springdale	146	150	5	0	1	302	7%
Springfield Twp	687	50	16	7	7	760	5%
St Bernard	41	0	3	4	2	46	2%
Sycamore Twp	25	0	32	4	1	58	1%
Symmes Twp	6	55	3	0	0	64	1%
Terrace Park	0	0	0	0	0	0	0%
Whitewater Twp	5	0	0	0	1	6	0%
Woodlawn	27	0	10	0	0	37	2%
Wyoming	12	0	6	4	3	21	1%

## CONCENTRATIONS OF POVERTY

Hamilton County has a poverty rate of 14.2% overall. Within the City of Cincinnati, that rate doubles with 29% of its residents living below the poverty level.

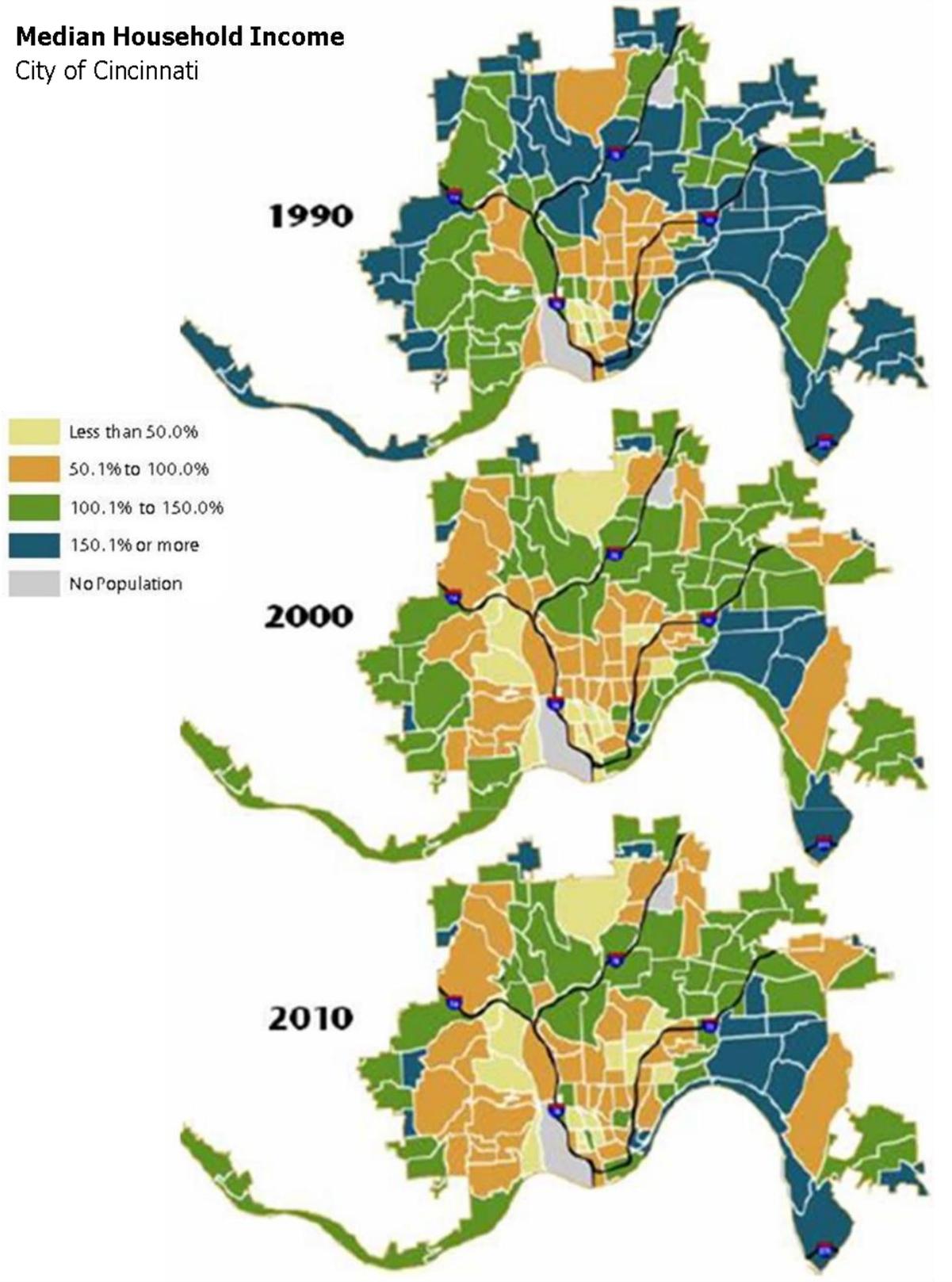




Source: 2006-2010 American Community Survey 5-year estimates. Graphic: PLAN Cincinnati, pg. 36

### Median Household Income

City of Cincinnati



Source: 1990 Census, 2000 Census and 2009 American Community Survey  
Graphic from PLAN Cincinnati 2011 Housing Market Study

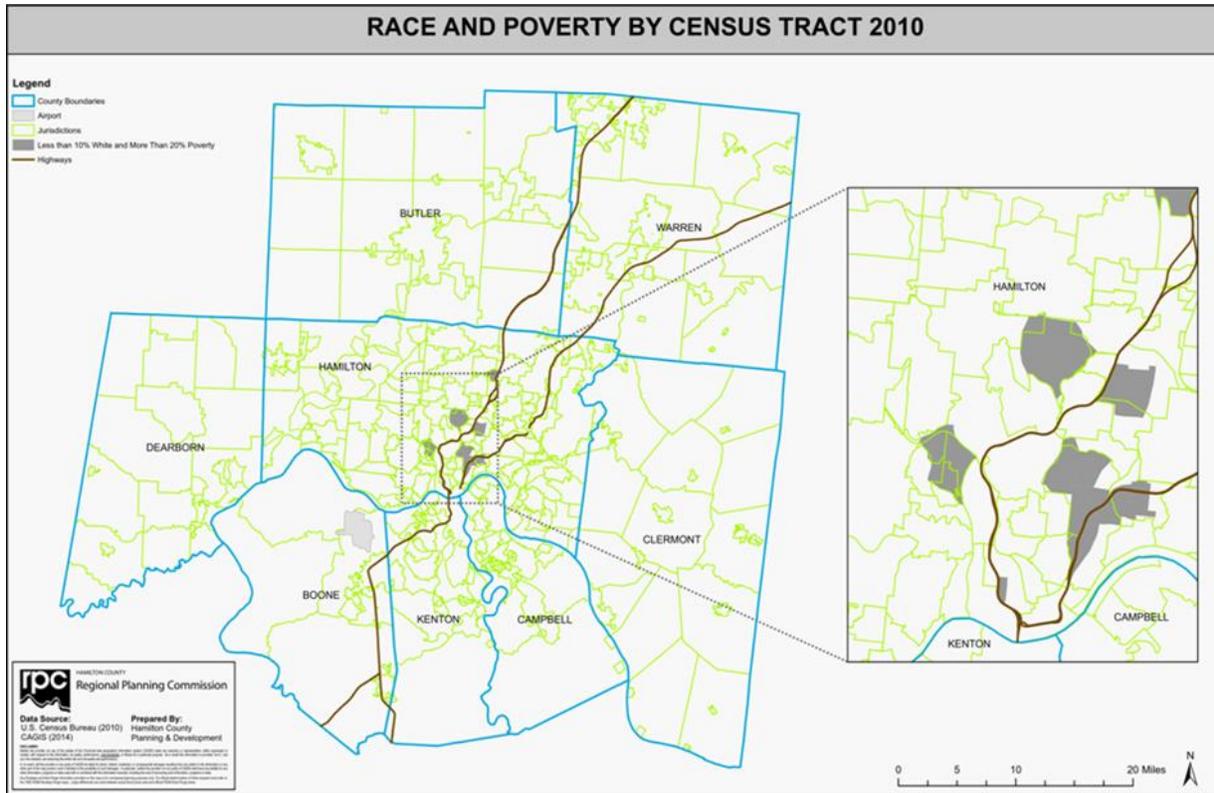
## RACIALLY CONCENTRATED AREAS OF POVERTY

Maloney and Auffrey, “The Social Areas of Cincinnati: Patterns for Five Census Decades,” 2013, provide an analysis of the percentage of African American and White families living in poverty. By applying HUD’s definition of disproportionate need, 17 neighborhoods show that African American families live in poverty at more than 10 percentage points higher than the total of all families in poverty in their neighborhoods. However, only one neighborhood showed White families to have this disproportionate need.

<b>Cincinnati Neighborhoods’ Racial Composition and Poverty</b>					
Disproportionate Need Only					
	<b>All Families</b>	<b>African American Families</b>		<b>White Families</b>	
<b>Neighborhood</b>	<b>% of Families Below Poverty Level</b>	<b>% of Families Below Poverty Level</b>	<b># of Families Below Poverty Level</b>	<b>% of Families Below Poverty Level</b>	<b># of Families Below Poverty Level</b>
Over-The-Rhine	61.7%	72.2%	518	15.8%	21
Sedamsville-Riverside	38.9%	58.9%	73	30.8%	94
South Fairmount	38.3%	29.0%	99	53.2%	150
East Price Hill	31.4%	43.9%	584	24.7%	586
Riverside-Sayler Park	26.9%	55.1%	75	9.2%	20
Fairview-Clifton	23.9%	34.9%	89	11.4%	57
University Heights	23.8%	49.1%	86	15.0%	74
Mt. Auburn	23.7%	35.0%	159	6.3%	18
Mt. Airy	21.3%	31.7%	369	7.5%	70
Westwood	16.1%	23.9%	814	9.2%	388
West Price Hill	15.7%	38.2%	259	12.0%	420
East End	14.7%	40.0%	30	7.7%	21
Hartwell	14.6%	25.3%	95	9.2%	63
Pleasant Ridge	12.8%	29.7%	254	2.5%	34
Madisonville	11.9%	22.0%	323	0.0%	0
Mt. Washington	10.2%	30.5%	64	9.1%	323
Oakley	8.4%	38.3%	51	6.5%	122
Clifton	8.1%	24.1%	79	1.0%	12

Source: 2005-2009 American Community Survey. Table adapted from Social Areas of Cincinnati 2013

The map, “Race and Poverty by Census Tract 2010,” shows those areas of Hamilton County with a population that is less than 10% White and with a poverty rate of 20% or more. These include 13 census tracts with a total population of about 35,000. Large public housing projects are located in these areas.

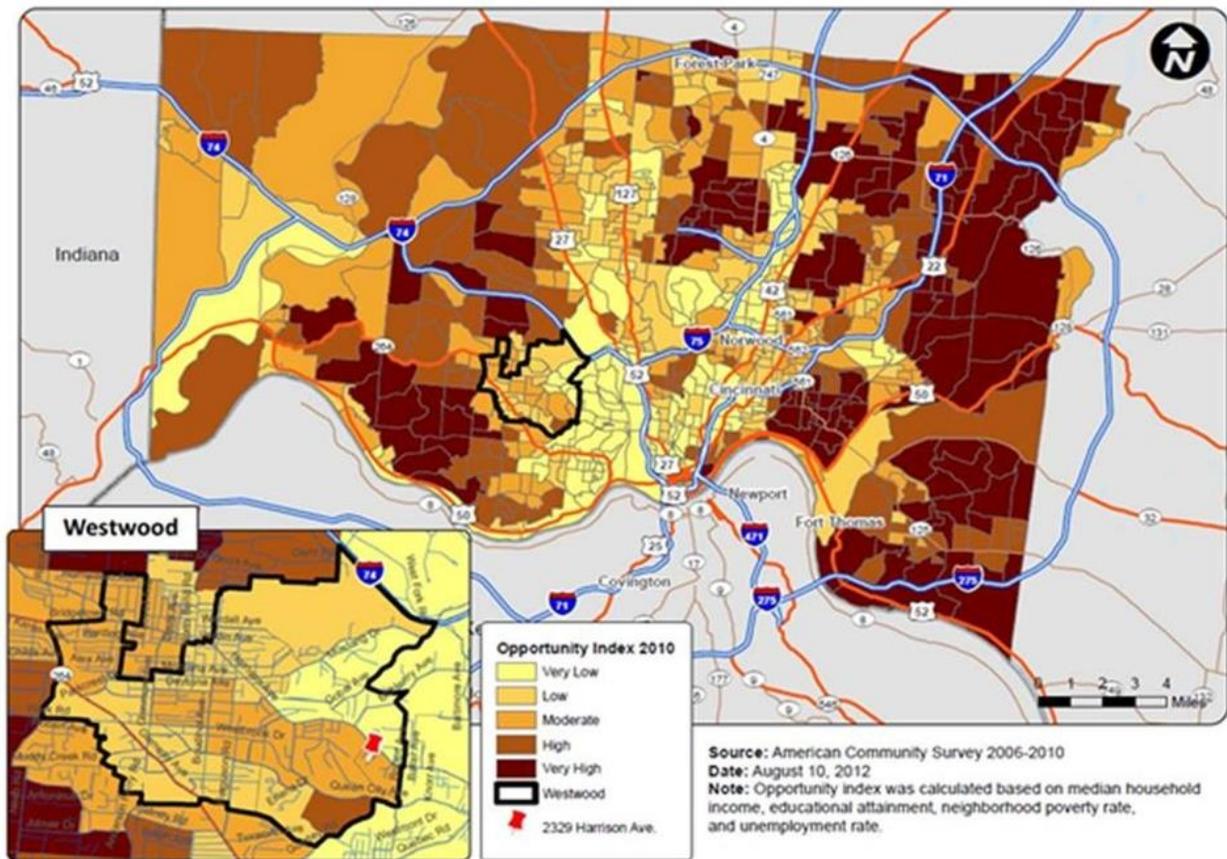


### Powell Opportunity Analysis

In 2012, John A. Powell, a recognized national expert in opportunity mapping, produced a report for the case analyzing opportunity measures and racial concentrations in Ohio, Hamilton County, and for the Westwood neighborhood of Cincinnati, which was the subject of the lawsuit. (*Note: Powell spells his name in lowercase.*)

In the report, opportunity is measured using 27 different opportunity indicators in five different opportunity areas (Education and Child Welfare, Economic Opportunity and Mobility, Housing, Neighborhood and Community Development, Public Health, Public Safety and Criminal Justice.) The data is shown geographically in terms of the quintiles: very high, high, moderate, low and very low opportunity.

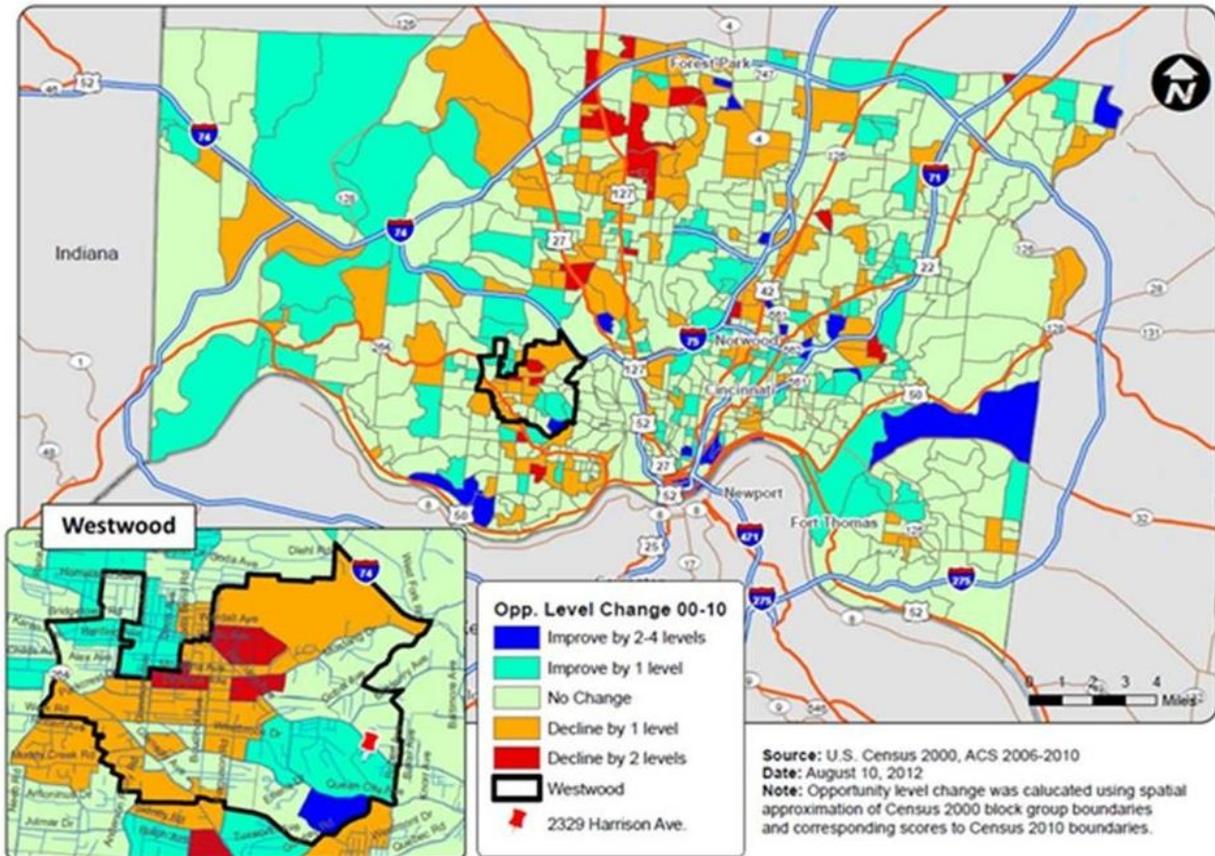
## Hamilton County, Ohio - Opportunity Map 2010



The map, "Hamilton County, Ohio - Opportunity Map 2010," shows the opportunity areas in Hamilton County.

These opportunity areas have not changed much over time, as the map "Hamilton County, Ohio – Opportunity Level Change 2000 to 2010" shows.

## Hamilton County, Ohio - Opportunity Level Change 2000 to 2010



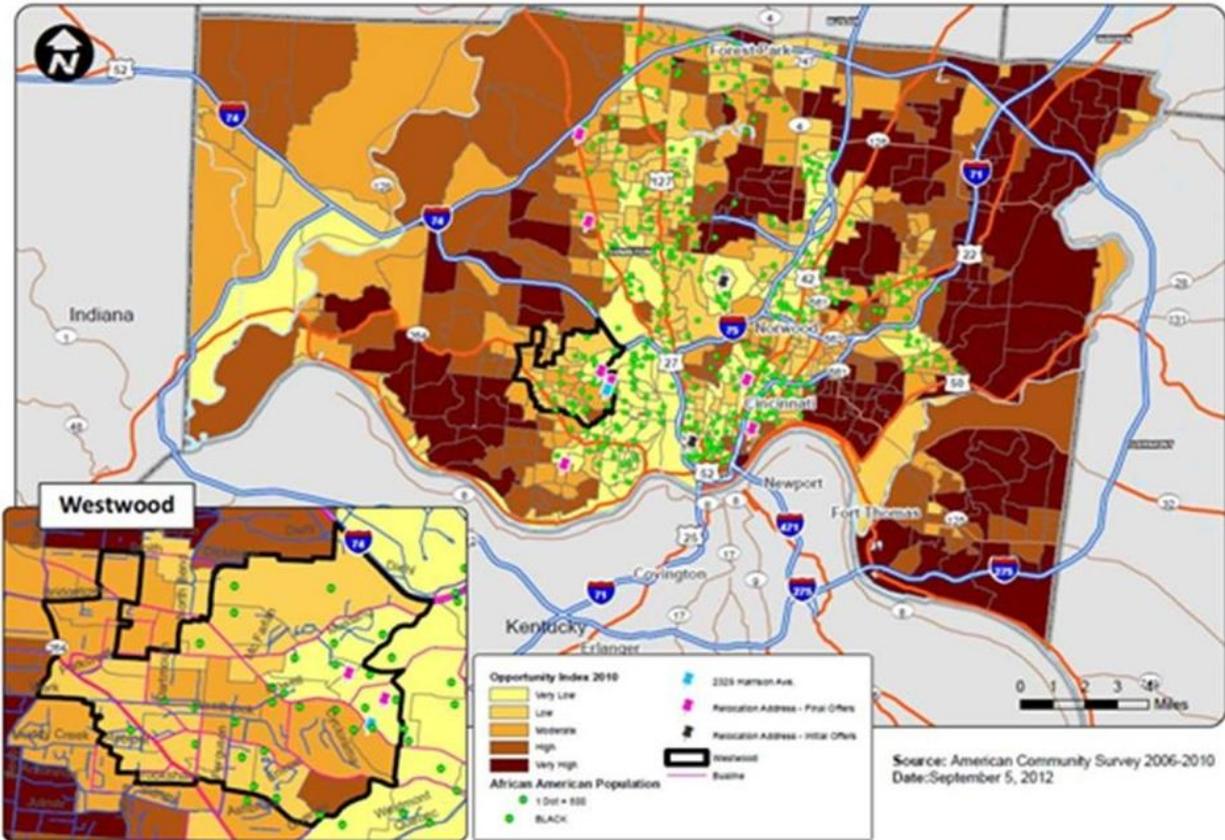
The full report produced by powell may be viewed at <http://www.cincyfairhousing.com/wp-content/uploads/2014/05/Opportunity-Neighborhood-Report-of-john-a.-powell.pdf>.

A two-year research study by the Kirwan Institute at the Ohio State University, during the time when powell was director, found that in Ohio, African American residents are disproportionately concentrated into the lowest opportunity neighborhoods.

Two-fifths of the state’s census tracts were low and very low opportunity neighborhoods. Nearly 3 out of 4 African American Ohioans lived in these neighborhoods, while only 1 out of 4 Whites were in the low and very low opportunity areas. These concentrations held across income groups. Higher incomes for many African American households did not necessarily translate to living in high opportunity areas at rates similar to other racial groups. More than 2 out of 3 middle-income African American households and more than 1 in 2 high-income African American households lived in low opportunity neighborhoods. In contrast, only 38% of low-income Whites lived in low opportunity areas.

These concentrations also were true in Hamilton County as seen on the map “Hamilton County, Ohio – Opportunity Map 2010 with African American population overlay.” Each green dot on the map represents 500 African American families.

**Hamilton County, Ohio**  
 Opportunity Map 2010 with African American population overlay



The report concluded that African Americans are disproportionately segregated, not simply by race, but from opportunity throughout the state and within the Cincinnati region.

**Stable integrated communities**

In spite of areas of racial concentration, Hamilton County also has many stable integrated communities. A 2007 research project studied integrated communities in Hamilton County over several decades. The demographic analysis was conducted by Charles F. Casey-Leininger, Ph.D. He identified 15 communities that had been racially integrated for at least 20 years. In 2011, Dr. Casey-Leininger repeated the study using 2010 Census data. An additional 13 communities were identified as stable integrated communities. For this research an integrated community is one having an African American population of not less than 10 percent and not more than 80 percent and having a Dissimilarity Index of not more than 65. This Index measures whether the races are living as neighbors on the same streets or clustered in different parts of the same neighborhood.

In 2012, HOME published a neighborhood guide called “Hidden Treasures” to publicize the communities and organized an inclusive communities forum at which awards were given to each of the 28 stable integrated communities.

The City neighborhoods honored are listed below along with the number of years they have been integrated:

- Camp Washington, 20 years
- Clifton, 20 years
- Clifton Heights-University Heights-Fairview, 30 years
- College Hill, 30 years
- Corryville, 40 years
- Downtown, 40 years
- East Walnut Hills, 30 years
- Hartwell, 20 years
- Kennedy Heights, 40 years
- Madisonville, 40 years
- Mt. Airy, 30 years
- Mt. Auburn, 40 years
- North Avondale, 30 years
- Northside, 30 years
- Over-the-Rhine, 40 years
- Paddock Hills, 30 years
- Pleasant Ridge, 30 years
- South Fairmont, 20 years
- Spring Grove Village, 30 years
- Westwood, 20 years

The County communities honored, along with the number of years they have been integrated, are:

- Forest Park, 30 years
- Golf Manor, 30 years
- Mt. Healthy, 20 years
- Springdale, 20 years
- Woodlawn, 40 years

These smaller communities as identified by the U.S. Census were also honored, but they are not separate local governments: Finneytown, Mt. Healthy Heights, and Pleasant Run Farms. Each of these communities has been integrated 20 years or more.

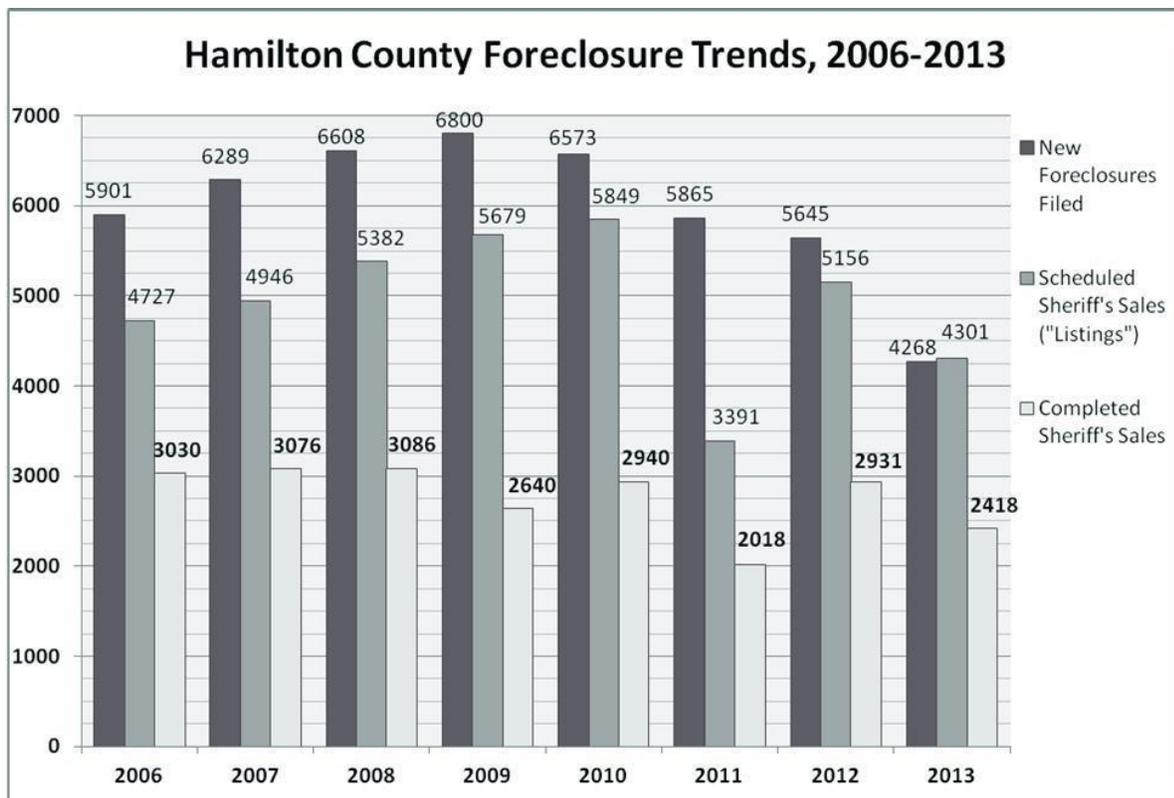
The full research report by Casey-Leininger may be seen at [www.cincyfairhousing.com/wordpress/wp-content/uploads/2011/11/Final-HT-Statistical-Report-from-UC.pdf](http://www.cincyfairhousing.com/wordpress/wp-content/uploads/2011/11/Final-HT-Statistical-Report-from-UC.pdf).

## Foreclosures in Hamilton County

The American home foreclosure crisis has impacted African Americans in Cincinnati and Hamilton County at higher rates than it has impacted other racial and ethnic groups.

This section looks at recent foreclosure data, while the next section looks at data on lending discrimination. Clearly these two issues have a direct relationship.

*In the Shadow of the Mortgage Meltdown: Taking Stock*, released by Working in Neighborhoods, shows that more than 22,000 homes in Hamilton County were foreclosed and sold at sheriff's sales during the last eight years. While the number is trending down since the peak of the foreclosure crisis, it remains at a high level. The cumulative effect of the foreclosed homes has left distressed neighborhoods and a significant loss of wealth among families.



Source: *"In the Shadow of the Mortgage Meltdown: Taking Stock"* by Working in Neighborhoods

No community in Hamilton County has been immune from the foreclosure epidemic. The top three impacted communities in 2013 have African American populations significantly higher than the county average of 25%. The table, "Top 10 Impacted Hamilton County Municipalities in 2013," measures impact not by the number of foreclosures, but by the foreclosure rate. In this way, the impact on smaller communities that have a high foreclosure rate is considered.

<b>Top 10 Impacted Hamilton County Municipalities in 2013</b>				
<b>Ranking Municipality</b>	<b>Owner-Occupied Homes in 2010</b>	<b>Foreclosures in 2013</b>	<b>Estimated Foreclosure Rate</b>	<b>Percent African American</b>
1. Golf Manor	1,837	31	1.69%	72.20%
2. North College Hill	4,267	70	1.64%	46.45%
3. Forest Park	7,854	104	1.27%	64.57%
4. Saint Bernard	2,128	27	1.26%	15.66%
5. Springfield Township	15,091	184	1.22%	39.65%
6. Fairfax	778	9	1.16%	2.35%
7. Greenhills	1,645	18	1.09%	6.50%
8. Cleves	1,190	13	1.09%	0.59%
9. Arlington Heights	382	4	1.05%	14.77%
10. Colerain Township	24,015	246	1.02%	16.54%

Sources: *"In the Shadow of the Mortgage Meltdown: Taking Stock"* by Working in Neighborhoods and Hamilton County Race Analysis ([http://www.hamiltoncountyohio.gov/pd/data/pdfs/jurisdictions/2010\\_Hamilton\\_County\\_Race.pdf](http://www.hamiltoncountyohio.gov/pd/data/pdfs/jurisdictions/2010_Hamilton_County_Race.pdf))

A similar table, "Top 10 Impacted Cincinnati Neighborhoods in 2013," shows that six of the ten hardest hit neighborhoods in the City – in terms of the percentage of foreclosures – are predominantly African American: Kennedy Heights, Madisonville, Bond Hill, Spring Grove Village, North Avondale and Paddock Hills. (Source: U.S. Census 2010 Data & 2006-2010 American Community Survey five-year estimates.) The City of Cincinnati, according to 2010 population estimates, is 44.56 percent African American.

<b>Top 10 Impacted Cincinnati Neighborhoods in 2013</b>			
<b>Ranking Neighborhood</b>	<b>Owner-Occupied Homes in 2010</b>	<b>Foreclosures Completed in 2013</b>	<b>Estimated Foreclosure Rate</b>
1. California	217	5	2.30%
2. Spring Grove Village	924	13	1.41%
3. Bond Hill	3,456	43	1.21%
4. Saylor Park	1,287	14	1.09%
5. Kennedy Heights	2,581	28	1.08%
6. Carthage	1,298	14	1.08%
7. West Price Hill	8,154	84	1.03%
8. North Avondale	1,784	18	1.01%
8. Paddock Hills	549	5	0.91%
10. Madisonville	5,270	45	0.85%

Source: *"In the Shadow of the Mortgage Meltdown: Taking Stock"* by Working in Neighborhoods

Of the ten Cincinnati neighborhoods where foreclosure numbers remain high, seven are predominantly African American: Avondale, Bond Hill, College Hill, Evanston, Madisonville, Roselawn and Westwood. The table, “Top 10 Numbers of Foreclosures in Cincinnati Neighborhoods,” provides details.

<b>Top 10 Cincinnati Neighborhoods in Total Number of Foreclosures</b>						
<b>Ranking Neighborhood</b>	<b>Number in 2013</b>	<b>Number in 2012</b>	<b>Number in 2011</b>	<b>Number in 2010</b>	<b>Number in 2009</b>	<b>Total 2009-2013</b>
1. Westwood	110	137	103	137	129	<b>1,066</b>
2. West Price Hill	84	118	80	118	108	<b>955</b>
3. East Price Hill	60	62	54	83	81	<b>750</b>
4. College Hill	34	71	48	67	68	<b>549</b>
5. Madisonville	45	47	35	78	48	<b>502</b>
6. Avondale	41	49	31	37	52	<b>452</b>
7. Northside	28	35	29	56	54	<b>443</b>
8. Bond Hill	43	57	42	43	54	<b>414</b>
9. Evanston	28	28	30	40	43	<b>399</b>
10. Roselawn	22	34	20	42	28	<b>276</b>

Sources: *“In the Shadow of the Mortgage Meltdown: Taking Stock”* by Working in Neighborhoods and U.S. Census Bureau 2010 Data and 2006-2010 American Community Survey five-year estimates

### **Lending Disparities**

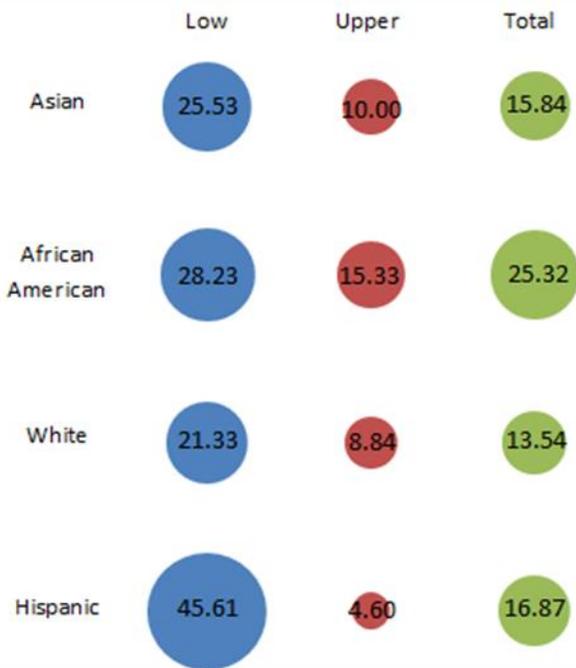
#### **African American homebuyers face significantly higher mortgage rejection rates than White homebuyers, regardless of income.**

According to the March 2013 report, “Racial & Ethnic Disparities in 2011 Ohio Mortgage Lending,” by the Housing Research & Advocacy Center, African Americans mortgage applicants in greater Cincinnati are rejected at much higher rates than their white counterparts with similar incomes.

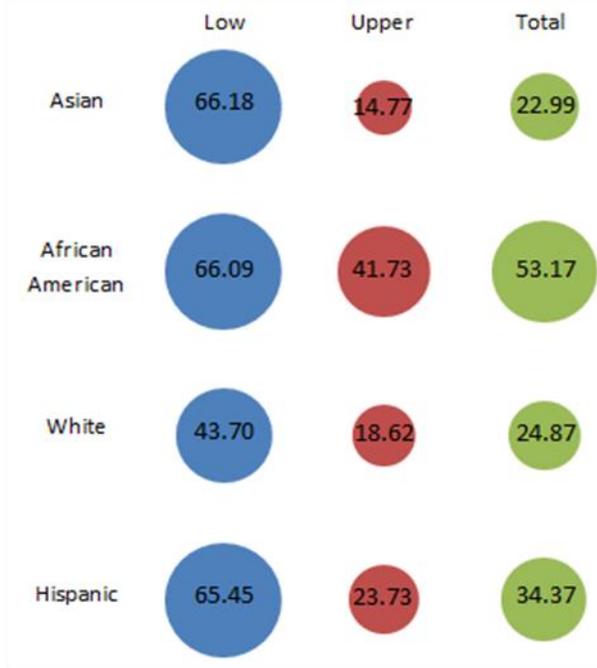
Low-income African Americans are nearly one-and-one-third times more likely to be rejected for an initial new purchase mortgage application than low-income whites, 28.23% to 21.33% respectively. Upper-income African Americans are nearly two times more likely than upper-income whites to be rejected on new purchase mortgage applications, 15.33% to 8.84% respectively.

The picture is similar for African Americans seeking to refinance homes. The study shows that mortgage lenders rejected more than 1.5 refinance applications from low-income African Americans for every one application from low-income whites, 66.09% to 43.70% respectively. Mortgage lenders in greater Cincinnati also reject nearly 2.25 refinance applications from upper-income African Americans for every one refinance application rejected from upper-income whites, 41.73% to 23.73% respectively.

**HP Denial Rates of Lower- and Upper-Income Individuals, Cincinnati, 2011**



**Refinance Denial Rates of Lower- and Upper-Income Individuals, Cincinnati, 2011**



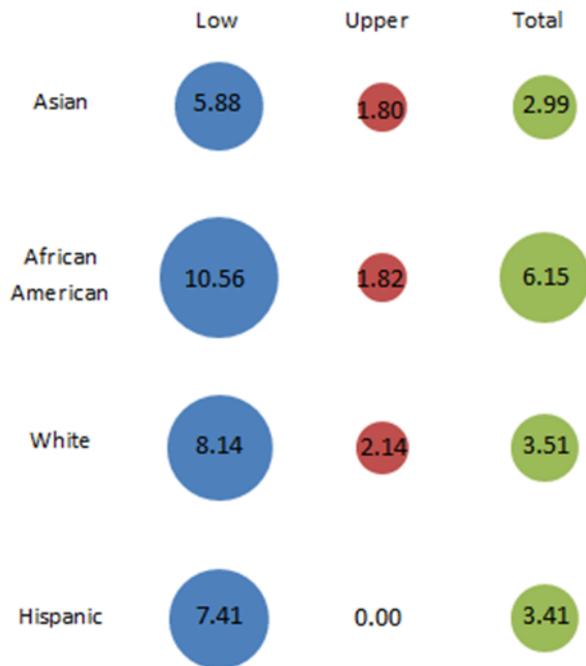
Source: "Racial & Ethnic Disparities in 2011 Ohio Mortgage Lending" by the Housing Research & Advocacy Center, March 2013: <http://www.thehousingcenter.org/wp-content/uploads/2013/03/RED-Report-2013.pdf>

**African American Residents are more likely to have high-cost mortgages – regardless of income – than similarly situated Latino, Caucasian and Asian American residents.**

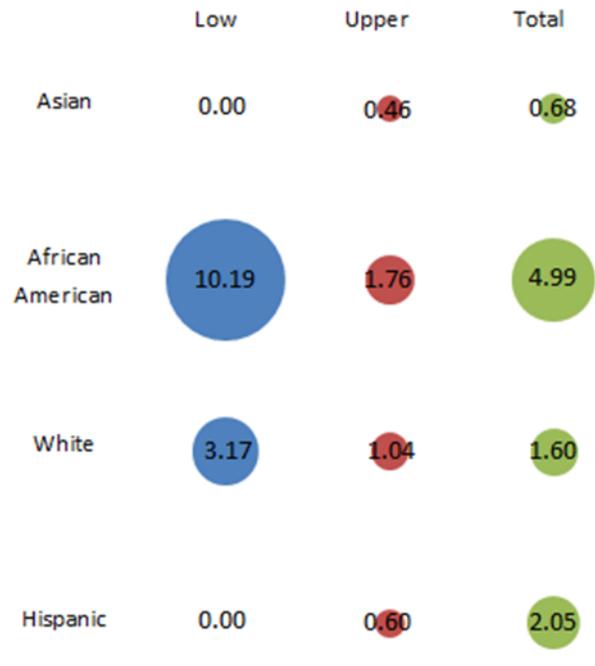
According to the Housing Research & Advocacy Center’s report, 6.15% of African Americans (averaged across income levels) who do receive initial purchase mortgages are given high-cost home purchase loans. This compares to an average of 3.41% of Latino borrowers, 3.51% of white borrowers, and 2.99% of Asian American borrowers.

Similarly, when African Americans refinance mortgage loans, 4.99% (averaged across income levels) receive high-cost loans compared to 2.05% of Latino borrowers, 1.60% of white borrowers, and .68% of Asian American borrowers.

### HP High-Cost Rates of Lower- and Upper-Income Individuals, Cincinnati, 2011



### Refinance High-Cost Rates of Lower- and Upper-Income Individuals, Cincinnati, 2011



Source: "Racial & Ethnic Disparities in 2011 Ohio Mortgage Lending" by the Housing Research & Advocacy Center, March 2013: <http://www.thehousingcenter.org/wp-content/uploads/2013/03/RED-Report-2013.pdf>

**CONCLUSION:** African American borrowers, regardless of income, are less likely to receive mortgage loans for homes, and when they do, they are far more likely to receive less favorable terms and conditions than similarly situated Latino, Caucasian and Asian American borrowers. High-cost home purchase loans are more likely to lead to home foreclosures.

## V. Fair Housing Legal Status

### Federal law

The primary relevant law is the Federal Fair Housing Act. Title VIII of the Civil Rights Act of 1968 (Fair Housing Act), as amended, prohibits discrimination in the sale, rental, and financing of dwellings and in other housing-related transactions based on race, color, national origin, religion, sex, familial status (including children under the age of 18 living with parents or legal custodians, pregnant women, and people securing custody of children under the age of 18), and handicap (disability). Other Federal laws and Executive Orders deal with related issues, particularly with discrimination and accessibility in federally-funded programs. A comprehensive listing is available at [www.hud.gov/offices/ftheo/FHLaws/index.cfm](http://www.hud.gov/offices/ftheo/FHLaws/index.cfm).

## **Ohio law**

Ohio's civil rights law is found at O.R.C. 4112. HUD considers Ohio's law substantially equivalent to the Federal Fair Housing Act. Because of the substantial equivalency, HUD refers fair housing complaints to the Ohio Civil Rights Commission for investigation and enforcement under Ohio law.

Ohio amended its law effective March 2008 to include military status as a protected class. Landlords and other housing providers may not deny housing or treat someone differently because of their military status, including status as a veteran. Such discrimination was not a problem in Hamilton County, but was noted in areas that are near military bases. Ohio law also includes ancestry as a protected class.

## **Local ordinances**

Cincinnati protects several classes from housing discrimination that are not included in federal or state laws. In Cincinnati, it is *also* illegal to discriminate in housing on the basis of marital status, Appalachian regional ancestry, sexual orientation and transgendered status. (Cincinnati Municipal Code, Sec. 914). The ordinance states that a complaint may be filed with the City Manager or a Complaint Office designated by the City Manager. To date no complaints had been filed.

Cincinnati also has an ordinance prohibiting discrimination against tenants who have government housing assistance, such as the Housing Choice Voucher, Cincinnati Municipal Code, Sec. 740-11. To date, no complaints have been filed.

In 2001, the City Council passed an ordinance, commonly referred to as the "Impaction Ordinance," that states, in "impacted areas," the City will "oppose the construction of new publicly-assisted low-income rental units unless the construction reduces the concentration of poverty or are intended for occupancy by the elderly." Under the Impaction Ordinance, rehabilitation of affordable units is still permitted, as long as the percentage of affordable units does not increase from when last occupied.

## **Lawsuits and Complaints**

This Analysis includes significant cases which have been filed since the 2009 Analysis of Impediments was published. One lawsuit was pending at that time, *Robinson v. CMHA*. The Plaintiff, a victim of domestic violence in her public housing unit, alleged the Cincinnati Metropolitan Housing Authority refused to transfer her to other housing. She contended that CMHA's policy and practice violated the Fair Housing Act and equal protection. The Southern District of Ohio denied her request for a transfer because they held she was not denied a dwelling as she still had a home and because the fear of returning to the home was not related to the housing authority. The federal court ruled that CMHA did not violate the 2013 reauthorization of the federal Violence Against Women Act (VAWA). After the case, CMHA made changes to their transfer policy for victims of domestic abuse as required by the VAWA.

In 2009, the United States Department of Housing and Urban Development (HUD) notified CMHA that it was conducting a Title VI investigation of its programs to determine if CMHA was compliant with the nondiscrimination requirement. In early 2011, HUD made several findings of racial discrimination. A

Voluntary Compliance Agreement was entered into in mid-2011. To address the finding that the Board had ordered no public housing to be built in the primarily White community of Green Township, CMHA agreed to purchase or develop 32 units of family public housing in the Township. To address the findings that Housing Choice Voucher-holders were treated differently by CMHA if they moved to certain White neighborhoods, CMHA was required to review and reconsider all Housing Choice Voucher terminations in 2008 to ensure they were consistent with HUD regulations. Other requirements included changes to the complaint intake process, implementation of a mobility process, and regular monitoring throughout the period of the agreement.

In *Davis v. Cincinnati Metropolitan Housing Authority*, three CMHA tenants filed fair housing complaints against the authority. The 2009 case involved tenants moved from their home in the Westwood neighborhood for renovations that were subsequently cancelled with the building left vacant. The case was resolved with the federal court ruling that CMHA violated the Uniform Relocation Act. Changes were made to CMHA's transfer policy in order to comply with URA. A settlement was reached and tenants were allowed to return to the property after it was moderately modernized.

In 2010, Housing Opportunities Made Equal assisted several women in filing discrimination complaints against Henry Bailey, a landlord, based on sexual harassment. The case was turned over to the United States Department of Justice, whose investigators found additional allegations that Bailey subjected tenants and prospective tenants to sexually discriminatory acts, such as unwanted touching and sexual comments, unauthorized entry into apartments, and improper offers to exchange housing benefits for sexual acts. The Department of Justice received a judgment against Bailey, and he was ordered to pay \$800,000 in damages and \$55,000 in civil penalties.

In 2011, Michael Gunn filed a fair housing complaint against his Westwood landlord. With the assistance of HOME, Gunn, who is white, stated his landlord placed a "Public Swimming Pool – Whites Only" sign on the pool gate after his bi-racial daughter swam in the pool while visiting him. The Ohio Civil Rights Commission found probable cause of racial discrimination and the Ohio Attorney General tried the case before an Administrative Law Judge. Damages of \$55,000 were awarded to Mr. Gunn and his family. The case and a picture of the sign were reported widely in the national press.

In 2011, Denise Colbert requested a parking space at the condominium she was renting in Cincinnati as a reasonable accommodation. After her request was denied, she filed a fair housing complaint against the condo association and the property managers. The association argued that Ohio law prevented providing an assigned parking space in the common area parking lot. After probable cause was found by the Ohio Civil Rights Commission, Colbert filed a case in federal court. A resolution was reached between the association and Colbert, which included a monetary settlement and a change in the procedure for handling reasonable accommodation/ modification requests in the future.

In 2011, female residents of the Anna Louise Inn filed a fair housing complaint in Federal court against Western & Southern Financial Group, Inc. The Anna Louise Inn is located in an historic building in downtown Cincinnati that offers dormitory style rooms for women. The corporation wanted to buy the Inn and filed numerous lawsuits to halt its renovation, issuing statements with highly negative

descriptions of the residents. The residents won a favorable decision denying the corporation's motion to dismiss their fair housing case and allowing the case to go forward. However, the nonprofit operating the Inn could not withstand the high cost of litigation against the corporation and the residents agreed to drop their case as part of a settlement reached between Western & Southern and the Anna Louise Inn. The corporation bought the property and agreed to allow the residents to remain until a new Inn could be built in a low- income, primarily African American neighborhood outside of downtown.

In 2013, the City of Montgomery in suburban Hamilton County filed in Federal Court requesting a declaratory judgment allowing them to prevent a group home for five adults with dementia from locating in the city. The group home provider filed a counterclaim under the Fair Housing Act alleging discrimination against people with disabilities. The case was settled with the City permitting the group home, agreeing to revise its zoning code in accordance with fair housing, and to pay \$25,000. *City of Montgomery, Ohio, v. Our Family Home, Inc.*

Currently there are three significant pending cases:

In 2010, an African American couple filed a fair housing complaint with the United States Department of Housing and Urban Development for discrimination on the basis of race in the lease of a home by a licensed real estate agent. The Ohio Civil Rights Commission found probable cause of racial discrimination and the couple filed a complaint in Federal Court. The case, *Jones v. McGrath*, is pending.

In 2011, HOME filed a fair housing complaint against CMHA for its preference policy in distribution of Housing Choice Vouchers. The complaint was filed with HUD and alleged the preference given to seniors on the CMHA voucher waiting list had a disparate impact on families with children. The HUD regional office gave an initial no probable cause ruling; however, HOME appealed the decision to the Washington, D.C., office. The appeal is pending.

In 2013, the City of Blue Ash gave Ingrid Anderson a citation for a miniature horse she kept as an assistance animal for her severely disabled daughter. The city claimed the animal was "livestock" and could not be kept in the city limits. After her request for a reasonable accommodation was denied, Anderson, working with HOME, filed a complaint with HUD and a complaint in Federal Court for a violation of the Fair Housing Act. The case is now pending with the Federal Court and the complaint is being investigated by the Ohio Civil Rights Commission.

### **Complaints Received by HOME**

Housing Opportunities Made Equal (HOME) is the private fair housing agency in the Cincinnati metropolitan area that counsels people who believe they have experienced illegal housing discrimination and helps them gather evidence and take enforcement action. Numbers and types of fair housing complaints received by HOME in the five years since the last Analysis of Impediments are listed in the charts "Complaints by Class – 2009-2013" and "Complaints by Category – 2009-2013." These charts include only those calls in which issues of possible illegal housing discrimination were raised. HOME receives many more calls from people with landlord-tenant problems or lending situations that they believe are "unfair," but which do not involve potential housing discrimination.

<b>Complaints by Class – 2009-2013</b>					
	<b>2009</b>	<b>2010</b>	<b>2011</b>	<b>2012</b>	<b>2013</b>
Race/Color	122	118	125	102	107
Disability	201	274	285	268	247
Sex (Gender)	23	37	33	33	35
National Origin	19	14	30	16	18
Religion	2	2	1	0	5
Family Status	59	67	60	80	87
Other	28	17	19	36	12
<b>TOTAL</b>	<b>454</b>	<b>529</b>	<b>553</b>	<b>535</b>	<b>511</b>

<b>Complaints by Category – 2009-2013</b>					
	<b>2009</b>	<b>2010</b>	<b>2011</b>	<b>2012</b>	<b>2013</b>
Rental	370	419	463	456	424
Sales	9	9	2	10	6
Lending	1	3	5	3	0
Insurance	0	0	0	0	1
Harassment	58	83	66	56	67
Other	16	15	17	10	13
<b>TOTAL</b>	<b>454</b>	<b>529</b>	<b>553</b>	<b>535</b>	<b>511</b>

National studies show that only a few of the people who believe they have experienced illegal discrimination ever report it or file a complaint. Therefore, an increase in complaints does not necessarily mean there is an increase in discrimination. It is more likely a reflection of the effectiveness of HOME’s outreach, education and advertising. One notable trend is the growth in the number of complaints based on family status. HOME attributes this change to its efforts to promote awareness of fair housing rights for families. It has been illegal to discriminate against families with children for more than 20 years, but it is apparent that many people renting single houses or a couple of rental units do not know the law. In addition to increased outreach, HOME focused some of its radio advertising on educating the public that housing discrimination against families with children is illegal. It also created an online video spotlighting such discrimination.

The increase in the complaints of discrimination based on disability noted in the 2009 Analysis has remained steady. The Fair Housing Act not only prohibits denial of housing because of a physical or mental disability, but also requires housing providers to grant requests for reasonable accommodations and modifications needed to allow someone with a disability an equal opportunity to use and enjoy the home. Also, the number of national origin complaints has remained stable since the 2009 Analysis.

In addition to complaints brought to HOME from 2009 through 2013, Legal Aid attorneys represented tenants in approximately 60 cases involving claims of Fair Housing Act or Section 504 violations. Mostly these were eviction cases where the fair housing issue was a defense and/or a counterclaim; some were conditions cases where the client had a disability and they had requested a reasonable accommodation

### **Complaints Received by Ohio Civil Rights Commission**

The Ohio Civil Rights Commission received 201 complaints of housing discrimination in Hamilton County from 2009 to 2013, as shown in the table “Complaints to OCRC – 2009-2013.” The OCRC complaints include both complaints received directly from people who thought they were treated unfairly and from those filed by people who first called HOME. HOME is able to gather evidence to support a suspicion of

discrimination and discuss alternatives, such as mediation. Like the complaints received by HOME, more complaints were filed with the OCRC based on disability than for any other protected class.

<b>Complaints to OCRC – 2009-2013</b>					
	<b>2009</b>	<b>2010</b>	<b>2011</b>	<b>2012</b>	<b>2013</b>
Race/Color	16	13	5	8	7
Disability	16	21	7	13	5
Sex (Gender)	1	6	4	7	2
National Origin	1	1	0	1	0
Religion	0	0	0	1	1
Family Status	11	14	9	8	10
Other	1	2	1	4	5
<b>TOTAL</b>	<b>46</b>	<b>57</b>	<b>26</b>	<b>42</b>	<b>30</b>

## V. Fair Housing Activities

The purpose of this chapter is to review the major fair housing activities in Cincinnati and Hamilton County. It includes the activities of Housing Opportunities Made Equal (HOME), the private fair housing agency serving the region, as well as the City and County’s implementation of the recommendations of the 2009 Analysis of Impediments and Fair Housing Action Plan.

Both Cincinnati and Hamilton County contract with HOME to provide fair housing services. HOME has been providing services in the Greater Cincinnati area since 1968 when the Federal Fair Housing Act was passed. HOME also currently has a 3-year fair housing enforcement grant from HUD.

- Client Services:** People who feel they have experienced illegal discrimination work with staff who counsel them, help gather evidence, and advise them of their enforcement options. Options include: having HOME staff intervene, which often is effective if the client still wants the housing; participating in private mediation; filing an administrative complaint with HUD or the Ohio Civil Rights Commission; or working with a cooperating attorney to file a lawsuit in court. Section IV discussed the number and types of complaints received by HOME.
- Systemic Testing and Audits:** In addition to gathering evidence based on individual complaints, HOME proactively tests the housing market in the greater Cincinnati area to uncover discrimination that may not be apparent to people seeking housing. It sends testers in pairs to see whether home-seekers are treated differently based on race or children. While most of the tests showed no discrimination, the knowledge that HOME is constantly testing the market is a strong deterrent to illegal discrimination. HOME also audits multifamily construction to ensure it meets the Fair Housing Act’s minimal accessibility requirements and monitors advertising.

- Education and Training:** HOME provides training for housing providers including Realtors and landlords and also for housing consumers. Classes are offered through Boards of Realtors, the Apartment Association, the Real Estate Investors Association, and special classes for landlords in the Housing Choice Voucher program. In addition, HOME provides in-house classes for private real estate companies and property management firms. Consumer presentations on fair housing rights are made at human services staff meetings, church groups, community councils, and university classrooms. In 2013, HOME's fair housing training reached 2,393 people through 64 classes for Realtors and property managers, 48 outreach presentations for consumers, and fair housing training for local governments. HOME also launched a new three-hour class, eligible for continuing education units, for Realtors, which focused on Implicit Bias. HOME also trained all CMHA property managers on reasonable accommodations.
- Mobility:** HOME provides a small Mobility program with City and County CDBG funding. The purpose of the program is to help families with Housing Choice Vouchers find housing outside areas with poverty rates. The program was larger in previous years and currently involves two part-time staff members who recruit landlords, screen tenants before referring them to landlords, and act as ombudsmen in resolving issues with the Housing Choice Voucher program. Because voucher-holders are more than 90% African American in Hamilton County and the low-poverty communities are predominantly White, the program also furthers racial integration.
- Housing Mediation Service:** HOME sponsors a Housing Mediation Service jointly with the Greater Cincinnati/Northern Kentucky Apartment Association and the Real Estate Investors Association of Greater Cincinnati. The services of professional mediators are available free to tenants and landlords to resolve fair housing issues or other housing disputes. The Mediation Service is particularly valuable in resolving disputes between tenants with disabilities and landlords concerning requests for reasonable accommodations under the Fair Housing Act.

## 2009 Analysis of Impediments Recommendations

In 2009 Cincinnati and Hamilton County conducted a joint Analysis of Impediments to Fair Housing Choice that identified 18 recommendations. This section will summarize actions taken since 2009.

- The City and the County need to work with CMHA to provide accurate information about the Housing Choice Voucher program, including how the program works, the percentage of elderly and disabled people on the program, and the percentage employed. The communities also need accurate information on comparative rates of assisted housing concentration.*

  - CMHA hired a new Chief Executive Officer in 2013 who has had more than 100 Community Outreach meetings throughout the County. In these meetings, he provides information about public housing and the Housing Choice Voucher programs and listens to community concerns.

- Affordable Housing Advocates, a coalition group, produced and launched a video called “Who Needs Affordable Housing in Greater Cincinnati” during 2012. The video and discussion guide have been presented at churches, in classrooms, and before civic groups.
  - CMHA has hired two Community Liaisons to work directly with local communities to quickly address concerns.
2. *The City and County should support, encourage, and participate with neighborhood groups who value inclusion and welcome new neighbors.*
- In 2011 the City and County participated with HOME in celebrating the stable integrated communities in Hamilton County. Awards were given to 28 communities at a forum that included a panel of neighborhood representatives discussing best practices in being inclusive. Awards were presented by a representative of the City and a County Commissioner.
  - In 2013 the City and County participated with HOME in hosting a forum called, “When Your Neighbor is Different from You, What Happens Next?” The discussion on building inclusive communities was attended by 60 people most of whom were active with their community councils.
  - The Inclusive Communities forum was repeated in 2014. The discussion focused on neighborhoods facing gentrification and how to ensure they stabilize as integrate mixed-income communities and not displace all the former residents. That forum drew 39 people from 21 different communities in the region.
3. *The Cincinnati Planning Department and Hamilton County Regional Planning Commission could take the lead in creating a positive image of diverse, mixed-income communities.*
- The City developed a new comprehensive plan approved in 2012. Plan Cincinnati was developed with extensive public input, and six Working Groups were formed to implement the goals.
  - The Plan commits Cincinnati to being an inclusive, welcoming city: “We will welcome and support all ethnicities, races, religions, and sexual orientations. We will create a Cincinnati that is connected, welcoming, and attractive to all people.”
  - It commits Cincinnati to creating mixed-income communities: “Distribute income-restricted housing equitably throughout the region.” “Create a stock of housing in each neighborhood that is affordable at all income levels.” “Incorporate inclusionary zoning policies into the new Land Development Code.” “Consider providing public funding only for projects that include units for a mix of incomes.”

- It recognizes the need for additional housing to meet the needs of residents with disabilities: “Cincinnati will increase accessible and visitable housing opportunities, especially along transit corridors and surrounding our centers of activity.”
  - It explicitly states the City’s commitment to fair housing: “Existing fair housing laws have been in effect for quite some time now. We need to strictly adhere to these laws and support them in order to prevent and stop all housing discrimination practices that are out there.”
  - Hamilton County Commissioner Todd Portune was elected chair of the OKI Regional Council of Governments during 2013. OKI is the metropolitan area planning organization. During 2013 and 2014, it worked on a Strategic Regional Policy Plan that incorporates a vision of diverse, mixed-income communities. It includes the objective: “Local governments (working with homebuilders, state agencies, and housing authorities where they exist) should encourage a range of housing choices in terms of price, size, type and location dispersed throughout the region.” One of the Policies to implement this objective is: “Local governments should continue to work with the community, developers, public housing authorities, nonprofit housing entities and private landlords to address the need for decentralized quality subsidized housing.”
4. *Elected officials and candidates should be asked to sign a pledge to refrain from inflaming racism and prejudice and to show respect for all citizens and their neighborhoods in campaign advertising and rhetoric. Such a pledge was developed and used by the Affordable Housing Advocates group after the negative campaigning in Hamilton County in 2006.*
- After 2009 the pledge was not pursued by Affordable Housing Advocates because of the proliferation of candidate pledges for various purposes. The negative campaigning has not been a significant problem since 2006. The one exception was in 2012 when a candidate for state representative mailed campaign literature that called people receiving Housing Choice Vouchers “a cancer that destroys our neighborhoods.” In response, HOME, Bridges for a Just Community, and the Cincinnati Human Relations Commission issued a public statement on Civility in Political Discourse.
5. *CMHA, the City, and the County should collaborate on an active program to recruit landlords in low-poverty areas and provide information and support to families with Section 8 vouchers interested in making integrative moves. A robust Mobility Program will ensure that families with vouchers have full housing choice.*
- At the time of the 2009 Analysis of Impediments only the City supported HOME’s Mobility program with CDBG funding. Since then, the County provided annual funding in 2010. CMHA funded the program for one year. The program could be much stronger with more funding.

6. *The City and County should ask CMHA to refrain from actions that limit housing choice such as using tenant-based vouchers to create project-based units or seeking ways to restrict access to certain neighborhoods.*
  - Since this impediment was identified early in 2009, HUD conducted a fair housing compliance monitoring of CMHA and made findings of racial discrimination for limiting access to certain neighborhoods. CMHA entered into and has implemented a Voluntary Compliance Agreement (VCA) that addresses issues related to this impediment.
  
7. *The City and County should involve Section 8 tenants in community meetings, including upcoming meetings to develop a Cincinnati Comprehensive Plan and community meetings to discuss community development funding.*
  - The City reached out to public housing residents and Housing Choice Voucher residents with the email announcing the online survey for citizen input. We sent emails to CMHA staff and board members, public housing resident boards and the all community councils. Five representatives from the Jurisdiction-wide Resident Advisory Board (J-RAB) attended one of the stakeholder meetings.
  
8. *The City and County should work with CMHA to establish a Community Advisory Committee that includes Section 8 tenants and advocates, landlords, and representatives of communities concerned about the impact of families with vouchers moving to their neighborhoods.*
  - The new Chief Executive Officer of CMHA decided that rather than setting up a Community Advisory Committee, CMHA would implement “Good Neighbor Agreements” with voucher residents and community groups. The CEO and top management staff met with representatives of the County Fair Housing Advisory Committee and meet regularly with Affordable Housing Advocates, landlords and community groups.
  
9. *Assertive law enforcement action is needed on fraudulent foreclosure prevention scams, the next generation of predatory lending that is targeting minority communities.*
  - The Hamilton County Clerk of Courts sends information to homeowners when foreclosure actions are filed warning of scams and referring them to approved, nonprofit foreclosure prevention services.
  - In 2012 HOME was awarded a FHIP Lending Education grant by HUD. HOME did outreach in Hamilton County warning of mortgage rescue scams and directing homeowners to legitimate nonprofit housing counselors. Through that program, 320 people attended outreach events and 1,326 educational materials were distributed. In addition to consumer outreach, HOME provided individual counseling to 189 homeowners at risk of foreclosure, 57% of whom were African American. In some cases the homeowners already had fallen prey to scammers and were referred to law enforcement agencies.

- Since 2009 the City has allocated CDBG for an Emergency Mortgage Assistance fund administered by Legal Aid. The County uses CDBG funds to support HUD-approved housing counseling agencies providing foreclosure prevention assistance and helping homeowners avoid scams.
10. *The City and County should ask the banks in Hamilton County to review their HMDA data and, where racial disparities exist, conduct self-testing and establish Mortgage Review Committees to ensure that loan originators and underwriters are not letting stereotypes and prejudice affect their decisions.*
- As part of its HUD Education grants, HOME organized Fair Lending Forums in 2012, 2013 and 2014 to reach lenders. The City and County participated in planning committees to organize the events along with representatives of several large local banks and the Federal Reserve branch. The events were held at the Federal Reserve Bank and successfully reached a large number of lenders. The lenders discussed why racial disparities in mortgage approvals exist and barriers to African American homeownership in the current lending environment. Best practices on increasing African American homeownership were shared.
11. *The City and County should work with major lenders to place more branches in minority and low- and moderate-income neighborhoods.*
- Other than discussion at the Fair Lending Forums described above, there was no action on this recommendation.
  - In 2013 and 2014, the City partnered with Smart Money Community Services/Lifespan to provide financial counseling to low- and moderate-income households. The contract was funded with CDBG dollars.
12. *Training needs to be provided to government officials and local zoning boards in Hamilton County on the Fair Housing Act rights of people with disabilities and the liability of jurisdictions who violate the law.*
- HOME provided fair housing training for City and County staff in 2011, 2013 and 2014.
  - In September 2012, the Hamilton County Regional Planning Commission sponsored a half-day forum on Accessibility and Visitability attended by representatives of 18 county jurisdictions. Forum speakers emphasized the need for housing that allows people with disabilities to be integrated into all communities.
  - The Hamilton County Regional Planning Commission conducts a Certified Planning Commissioners' Program with five-training sessions. The training covers liability of jurisdictions under the Fair Housing Act.

13. *The City Planning Department and Hamilton County Regional Planning Commission should provide siting assistance programs that enable the siting of special needs housing by providing community education, dispute resolution services, and tools such as Good Neighbor Agreements.*
- The Cincinnati Metropolitan Housing Authority is negotiating Good Neighbor Agreements with local jurisdictions and community councils to reduce misunderstanding and tension around its properties and with the Housing Choice Voucher program. So far, four Agreements have been signed and others are pending.
  - The City has experienced problems trying to identify and receive approval for homeless shelters and permanent supportive housing projects. However, in recent years, four shelters and/or permanent supportive housing projects are in process or have been completed. These include the new Sheakley Lighthouse Youth Shelter, relocation of the City Gospel Mission, construction of a new Drop Inn Women’s Shelter, and construction of a new Anna Louise Inn. The relocation of the Drop Inn Men’s Shelter will begin soon. Proposed construction of new permanent supportive housing by National Church Residences has been stalled. Locations in Avondale were met with some community backlash. The Avondale Community Council and area religious leaders supported the project; but the residents closest to the original location organized opposition to the site. They also opposed any other location in Avondale. The Ohio Housing Finance Agency is willing to transfer the tax credits to another site, but a new site has not yet been identified.
14. *When the City and County issue occupancy certificates for new multifamily buildings, the inspectors should ensure that the minimal accessibility requirements of the Fair Housing Act are met.*
- Since 2009, both Cincinnati and Hamilton County have provided accessibility training for their building inspectors.
  - HOME Design and Construction audits have not found any significant violations of multifamily design and construction requirements in the last five years.
  - In 2011, Cincinnati City Council appointed a Visitability Task Force to increase and promote visitable and accessible construction in the City of Cincinnati. In 2014, the City added additional incentives to its Residential Tax Abatement ordinance for properties that meet “Visitability” standards.
15. *The City and the County should expand their programs providing accessibility modifications for existing housing to serve renters as well as homeowners.*
- In response to this recommendation, Hamilton County developed a program to help fund accessibility modifications for low-income renters jointly with the Center for Independent

Living Options and People Working Cooperatively. The program was funded by CDBG at \$100,000 in 2010 and 2011. From 2012 to 2014 it has received \$25,000 annual funding. The program does not serve tenants in Cincinnati, and the City has not implemented a similar program to date.

16. *Information on accessible rental units needs to be made more readily available.*

- The City and County both provide tenant-based rental assistance for people with disabilities using HOME Investment Partnership Program funds. People receiving the vouchers who need accessible units are directed to the Center for Independent Living Options, which serves as a clearing house for information about accessible units. The State of Ohio maintains a statewide Housing Locator that provides some information on accessibility. Comments from advocates and landlords during recent focus groups suggest that neither of these sources meet the need for current information regarding accessible vacancies. While people with disabilities find it hard to find accessible units, landlords are renting accessible units to people who do not need the features when no one with a need applies.
- In 2011 began providing HOME funding to continue a contract to Hamilton County Community Development to operate and provide Tenant Based Rental Assistance (TBRA) to eligible households within the City of Cincinnati. The TBRA covers a portion of the household rent payment for client households. The program is marketed to persons with disabilities.

17. *A significant marketing campaign could open the housing market to families by raising public awareness that housing discrimination against families with children is illegal.*

- In 2012 HOME obtained a competitive HUD fair housing education grant to conduct a media campaign to raise awareness about familial status discrimination. A short video was written, produced, and placed on YouTube. So far it has had more than 1,200 individual viewers. To promote the video, 16 articles were published in local community newspapers and six billboards were displayed throughout the greater Cincinnati area. In addition, 268 radio ads were played in Spanish and English on six different local radio stations. In 2013, HOME saw a 36% increase in familial status complaints.
- The County staff administering Tenant Based Rental Assistance added discrimination awareness training to people receiving TBRA. The City and County directed the Strategies to End Homelessness, formerly Cincinnati Continuum of Care, to add this training to their programs assisting individuals and families transitioning from shelters to rental housing.

18. *Educate female tenants that sexual harassment by landlords is illegal and should be reported to HOME.*

- Since 2009 HOME has aired approximately 120 radio ads each year encouraging women to report sexual harassment by landlords. Sexual harassment was a major topic at consumer

education presentations during the year. In 2012, a sexual harassment case involving multiple victims that HOME had referred to the U.S. Department of Justice was settled for \$855,000. Press coverage of the settlement also served to educate the public that sexual harassment by landlords is illegal.

- The City and the County provide CDBG funding to carry out fair housing activities contractually with HOME.
- The City provides CDBG funding to Legal Aid Society for the Tenant Representation Project which provides legal representation for low-and moderate-income tenants in the City of Cincinnati.

## **2014 Impediments to Fair Housing Choice**

This section lists impediments to fair housing choice in Cincinnati and Hamilton County and makes recommendations on steps that can be taken to address the impediments. The conclusions in this section are based on data and information from previous sections and on the focus groups and interviews described in the Methodology section.

### **1. Lack of public transportation in opportunity areas**

Every focus group said that the major impediment to housing choice was lack of public transportation in opportunity areas. As one participant said, “It really comes down to transportation and affordable housing.”

The bus system is operated by the Southwest Ohio Regional Transit Authority. SORTA, an independent political subdivision of the State of Ohio, operates Metro fixed-route bus service and Access paratransit service for people with disabilities. SORTA is governed by a 13-member board of trustees, 7 appointed by the City of Cincinnati and 6 appointed by Hamilton County. Hamilton County appoints 3 of its own trustees plus 1 each representing Butler, Clermont and Warren counties. Public funding for the system comes primarily from an earnings tax paid by those who live or work in the City. In conversation about the Analysis of Impediments, SORTA management said they would like to expand the system. They have developed a Go Forward Plan with extensive community input that shows where they would expand when funding is available. These plans would expand service into areas where housing choice is currently limited because of lack of public transportation.

***Recommendation 1.0:*** Support implementation of the SORTA Go Forward Plan. Encourage county jurisdictions to work with SORTA on increasing public transportation service in their communities.

**2015 Action Plan:** City and County staff will meet with SORTA to learn more about the Go Forward Plan. They also will review and analyze the plan to determine what actions could be taken to increase public transportation service in additional communities.

### **2. Zoning and building code barriers**

Zoning codes are an impediment to housing choice when they make it difficult to locate group homes or affordable housing. Some jurisdictions in the County limit multi-family housing and have minimum square footage requirements for single-family homes. Others have not been updated since the 1960s, and according to the County Planning Director, could be in violation of the fair housing laws. Many of the communities are financially strapped and currently experience little development, so the communities don't see the need for planning/zoning updates.

#### **2.1 Zoning codes restrict the siting of group homes.**

In the last several years there have been several controversies about the siting of group homes. As part of the settlement of a 2013 fair housing case in Federal Court brought by the owner of a group home for

adults with dementia, the City of Montgomery agreed to review and rewrite its zoning code in accordance with fair housing law.

Most recently Cincinnati opposed sober living houses in the Price Hill neighborhood. While in that case there were issues of whether the homes were overcrowded and unsafe, the community and political outcry against the homes spoke of not wanting “those people” in the neighborhood. People with former addictions are considered people with disabilities and are protected from discrimination under the Fair Housing Act. The perspective of the focus group on people with disabilities was that “there is a huge need for these facilities, and the City makes them difficult.”

The Cincinnati zoning code defines a “family” as not more than four people unrelated by blood, marriage or adoption, and limits where group homes of more than four residents can locate. It makes distinctions among different types of group homes (e.g. assisted living, developmental disability dwelling, fraternity/sorority, patient family home, shared housing for the elderly, homeless shelter, and transitional housing). The neighborhoods and blocks where the homes are permitted depend on how it is classified. These restrictions can be impediments to fair housing choice.

The City is currently rewriting its zoning code. It received a Sustainable Communities Challenge Grant from HUD to help support the development of a new Land Development Code. Advocates have recommended that in rewriting the code, the City remove all zoning classifications that are based on who will be living in residential housing. It would continue to have an occupancy standard based on square footage to prevent overcrowding, but it would apply equally regardless of whether the residents have disabilities or how they are related.

***Recommendation 2.1:*** In adopting Cincinnati’s new Land Development Code, consider removing all zoning classifications based on who lives in residential property.

**2015 Action Plan:** The City is reviewing suggestions made for the new Land Development Code, including this suggestion. City staff will work with the FHAC to address this issue.

## **2.2 Within the county jurisdictions, zoning limits the possibilities for affordable housing.**

Focus group participants noted that some of the mostly-white communities have zoning that designates only single-family housing and especially large-lot, single-family housing, often with minimum house sizes. Participants felt these zoning restrictions reflected community attitudes of not wanting affordable housing. One developer reported that a jurisdiction insisted on a high percentage of one-bedroom units as a condition to granting permits because they do not want children. He said, “We know the market, and this is not what people want today.” It is beyond the scope of this Analysis to review the zoning in each of the 49 jurisdictions in Hamilton County. Such a review would be the starting point in addressing this impediment.

**Recommendation 2.2:** Review zoning codes in Hamilton County and make recommendations to the jurisdictions on changes needed to comply with the Fair Housing Act and to affirmatively further fair housing. Include a review of the jurisdictions' reasonable accommodation procedures.

**2015 Action Plan:** The County plans to offer a seminar for local communities on fair housing requirements as related to zoning codes. County staff also will offer to review local communities' zoning codes for compliance with fair housing laws.

### **2.3 Zoning and building codes can make accessibility modifications expensive and burdensome.**

Focus group participants said that the City requires people making reasonable accommodations requests to go through a zoning variance process that requires a \$300 fee, public notice and a public hearing. This is particularly burdensome when a person needs the modification, such as a ramp, to be able to leave the hospital or rehab center and return to their home. An accommodation may be needed if the ramp would violate zoning setback or side yard rules. As part of the rewrite of the City's zoning code, advocates have recommended that the City establish an administrative reasonable accommodation procedure that is separate from the formal zoning variance process to expedite reasonable accommodation requests and make them less burdensome.

**Recommendation 2.3:** Cincinnati establishes an administrative reasonable accommodation procedure that is separate from the formal zoning variance process to expedite reasonable accommodation requests and make them less burdensome.

**2015 Action Plan:** The City will implement administrative changes to lessen this burden.

### **2.4 Local government staff members appear to lack understanding of fair housing laws.**

Based on comments from focus group participants, those who enforce zoning and building requirements seem unaware of laws regarding reasonable accommodations and modifications for people with disabilities and discrimination against families with children. While some fair housing training for local government employees has been offered, it would be useful to provide training targeted specifically at zoning and building enforcement staff.

**Recommendation 2.4:** Provide fair housing training for local zoning and building staff.

**2015 Action Plan:** We will schedule training for city and county staff who enforce zoning and building modifications.

## **3. Affordable housing is concentrated in racially segregated areas.**

There is a lack of support for new affordable housing because of NIMBY ("not in my backyard") attitudes in many communities. Developers in the focus group talked about the difficulty of developing affordable housing when facing community opposition and the tendency to avoid the problem by building market

rate housing. They noted that even high-end multi-family developments can face opposition in some Hamilton County jurisdictions.

The Low Income Housing Tax Credits awarded by the state tend to be concentrated in racially segregated areas. The tax credits are used primarily to support the rehabilitation and preservation of current affordable housing, rather than building new housing. The local inventory of HUD-assisted multi-family housing is large and many properties are old and in need of expensive rehabilitation to continue to be viable.

The Cincinnati Metropolitan Housing Authority currently is reviewing its asset management inventory and is considering the sale of some of the scattered site housing it bought in the last 25 years. These units were acquired to give public housing residents the opportunity to live outside of the large public housing projects in racially identifiable areas of concentrated poverty. The assisted housing map and table in Section 3 of this report show the extent to which CMHA has been successful in offering choices to low-income, primarily African American, residents in most jurisdictions in the County. The disposition of all or part of this inventory without replacement housing in the same communities would be a step backwards in ensuring fair housing choice.

**Recommendation 3.0:** Encourage CMHA to maintain its scattered site inventory and assist it in obtaining funding to maintain and expand scattered site public and affordable housing.

**Recommendation 3.0.1:** Require all City-funded residential development to follow inclusionary housing policies as required by law as recommended in **Plan Cincinnati**.

**Recommendation 3.1.2:** Advocate fair housing standards throughout the region as recommended in **Plan Cincinnati**.

**2015 Action Plan:** The City will consider a policy that prioritizes mixed-income (and mixed use) housing development in applications for funding.

County will advocate for affordable housing to be developed throughout the entire region, as opposed to a few select areas.

#### **4. Barriers to mobility of families with vouchers**

The Housing Choice Voucher program or “Section 8” is designed to give families who need rental assistance more choices in where they live. Currently about 10,000 households have Housing Choice Vouchers in Hamilton County, and 88% of them are African American. With the tenant-based voucher, they find housing on the private rental market and use the assistance to pay rent wherever they choose to live. The foreclosure crisis has opened up more single-family homes throughout the county for rental, which could be an opportunity for more families with vouchers to move to opportunity areas. Several barriers were identified for families to fully exercise this choice.

**4.1 Many in the focus groups talked about people not wanting to move to certain communities because they have a reputation as being unwelcoming or even dangerous for African Americans.**

Memories are long, and parents pass down warnings about white neighborhoods their children should avoid because, when they were young, it was dangerous for a African American youth to be seen there. Today the warnings often involve stories of police in certain communities stopping any African American driving through. It doesn't help when community leaders are quoted in the media insulting people with housing assistance as occurred in the last couple of years when the housing authority signed an agreement to place 32 units of public housing in a primarily white township and when a candidate for state representative called Section 8 a "cancer" on the community. Whether or not these perceptions and reputations reflect today's reality, they are the basis of a family deciding where to live.

**Recommendation 4.1:** Work with Cincinnati Community Councils and County jurisdictions to encourage welcoming initiatives and become more inclusive in leadership development and civic activities.

**Recommendation 4.1.2:** Ask City Community Councils to annually report the composition of their Boards compared to their community.

**Recommendation 4.1.3:** Fund and support fair housing testing and enforcement activities to mitigate discrimination in housing (**Plan Cincinnati** recommendation).

**2015 Action Plan:** The City will begin to draft an inclusion policy to be adopted by Community Councils. The inclusion policy may include reference to inclusion of persons of all races, ethnicities and income levels, and renter as well as homeowner households.

The City will continue to provide funding for Fair Housing activities including testing and enforcement activities.

The City and County will work collaboratively to host community forums in neighborhoods to foster exchange and open dialogue among residents.

County will increase funding to HCV (Housing Choice Voucher) Mobility Program, facilitated by HOME (Housing Opportunities Made Equal).

**4.2 Landlords can decide not to accept Section 8, so it is a major barrier to choice if too few participate in the program.**

Rental property owners in the focus group reported that accepting vouchers in Hamilton County is a "tremendous hassle." They referred generally to the "bureaucracy" and specifically to the time to get approvals. "I need to turn properties fast and lose money when it takes them weeks to inspect the property and do the paperwork." The rents that CMHA will pay are seen as lower than what owners can get as market rent. CMHA's policy allows 80% of market rent in some cases. There is frustration over units that fail inspections over small items even after an owner has invested in expensive rehab of the

unit and the tenant loves it. Landlords also report frustration with turnover of CMHA staff. “I never know who to talk to.”

For years the rental market in Hamilton County was relatively soft, so rental property owners were willing to accept Housing Choice Voucher tenants rather than take a loss on a unit sitting vacant for a number of months. In the last couple of years demand has increased in the rental market with fewer vacancies and increasing rents. Developers are announcing plans to build new apartment complexes to meet the demand and landlords are now showing apartments to groups of applicants on the same day and selecting the one with the highest income and best credit. In such a market, landlords who once rented to families with vouchers are pulling out of the program because it is not worth the effort when they have market rate applicants. This significantly restricts choice for the families with vouchers in the more desirable neighborhoods.

**Recommendation 4.2:** Encourage CMHA to review the Housing Choice Voucher program to make the program more acceptable to rental property owners. Work with CMHA to track families with vouchers who live in low-poverty communities in Hamilton County.

County will encourage landlords currently participating in the County’s TBA/TBRA Programs to research and become involved with CMHA’s HCV program. Since the regulations are very similar to the County’s program, transitioning to HCV would be simple.

#### **4.3 Families with vouchers are not knowledgeable about opportunity communities.**

In Hamilton County families with vouchers are pretty much on their own in finding suitable housing from a landlord who accepts the voucher. CMHA refers families to a national website, [www.gosection8.com](http://www.gosection8.com), and asks landlords to post vacancies on that website. It also periodically hosts a Super Saturday event at their offices where landlords with vacancies and families looking for housing can connect. HOME operates a small Mobility program, funded with City and County CDBG funding, that recruits landlords in low-poverty areas and refers tenants with vouchers. The program places about 60 families a year with current funding. With two part-time employees, it is not able to serve all the families looking for help in finding housing.

In interviews for the Analysis of Impediments, families with vouchers reported that their primary concern in looking for housing was the safety and security of their children. They say it is discouraging when so many landlords refuse to take the voucher and they have time constraints in finding a new place. It is hard to look at different places in unfamiliar neighborhoods when they have an hourly job, children, and no car. They often accept units that are not desirable and end up moving again at the end of the lease.

Methods other regions have used to remove barriers to the housing choice of families with vouchers include passing “source of income” protection making it illegal discrimination to refuse to rent to a family who otherwise qualifies because part of the rent payment is coming from a government program. Some areas provide a robust Mobility program to counsel families and familiarize them with low-poverty

neighborhoods. Notable examples are Baltimore and the Chicago area Mobility demonstration project that is a joint effort of eight housing authorities in that metropolitan area.

**Recommendation 4.3.0:** Support adding source of income protection to Ohio’s fair housing law.

**Recommendation 4.3.1:** Continue City and County support for the Mobility program to help more families find rental opportunities in the neighborhoods of their choice.

County will increase funding to HCV Mobility Program, facilitated by HOME.

## **5. Barriers for immigrant populations**

Although the area’s Hispanic population is only a little over 3%, the maps in Section 3 show that most Hispanic families live in just a few County jurisdictions and City neighborhoods. Focus group participants stated that many of the Hispanic families live in deplorable conditions in housing not of their choice. The barriers noted were:

### **5.1 There is a lack of Spanish-speaking staff for public services and among landlords.**

Hispanic immigrants reported moving to apartment complexes even though the conditions are poor because a property manager speaks Spanish. When HOME’s tenant advocate encourages tenants to report serious conditions problems to local government inspectors, a common response is, “I can’t; no one there speaks Spanish.” When tenants agree to let HOME make the complaints on their behalf, the HOME staff person must go onsite with the Health or Building inspector to interpret.

The City Health and Building departments do not have a Spanish-speaking employee who conducts inspections although they can “borrow” an employee from other duties when necessary. The situation in the County is more complex because many small jurisdictions have their own building inspectors. The County Health Department has one Spanish-speaking staff person.

**Recommendation 5.1:** Explore options to increase staff capacity to work with Spanish-speaking residents in departments that take complaints and enforce laws related to housing conditions. Provide language training for current employees. Work with existing nonprofit organizations such as Su Casa and Santa Maria Services who provide services to these residents.

**2015 Action Plan:** Add Spanish language options to City’s main customer service line.

City and County will explore online and software to translate documents, etc.

Include human resources preference for bilingual skills for key customer service positions.

County will research the possibility of adding Spanish language options to the current phone service.

## **5.2 Immigrants feel unwelcome in some communities and tend to avoid these areas.**

Participants in the focus groups told of how responsive and surprised immigrants were when a community or agency made an effort to make them feel welcome by having material in their language, a liaison, or just acknowledging them and inviting them to community meetings. Participants in the Spanish-speaking focus group said the segregation patterns shown in the maps were not the result so much of people wanting to live together, but lack of information about other areas and fear of not being welcome.

**Recommendation 5.2:** Encourage and support community events that engage immigrant families as neighbors, potential business customers, and parents.

**2015 Action Plan:** Research the option to restart the Urban Homesteading Program including a focus to work with immigrant families.

County will encourage participating community to provide various pertinent government documents in languages targeted toward their respective immigrant populations.

## **6. Barriers to African American Homeownership**

The foreclosure crisis increased opportunities to buy outside of traditional African American neighborhoods because the properties have become more affordable. However, at the same time, credit standards have tightened making it more difficult to obtain a mortgage loan to purchase a home. HMDA data reported by lenders and reported in Section 3 shows African American homebuyers in Hamilton County face significantly higher mortgage rejection rates than whites, regardless of their incomes, and when they do get a mortgage, it is more likely to be a high-cost loan. While not denying that some individual discrimination may exist, lenders say the difference is primarily because African Americans have lower credit scores and less savings or family help available for a down payment.

Focus groups identified as barriers the lack of understanding of the lending process, fear of predatory lending, and a general distrust of banks. One focus group member said because the African American community was targeted for predatory loans, “the fear of predatory lending is still strong and very alive.” It was felt that traditional housing counseling services reach only the most motivated who feel they are ready to buy a home. Participants suggested that more general financial education was needed starting at the school level. At a Fair Lending Forum in Cincinnati this year, there was a recommendation that rather than providing in-depth housing counseling, there was a need for “expert help,” someone knowledgeable who was available to answer questions and explain the mortgage process. That person would be objective without a financial interest in the transaction and could reassure the borrower about what was normal and flag predatory terms.

Another barrier identified at the Fair Lending Forum was the current housing market conditions in traditional minority communities. Affordable single-family homes that are attractive to community members ready to move up to homeownership often do not meet lender inspection standards or, if they

have been rehabbed by nonprofit community development corporation, do not appraise at a sales level that covers the rehab costs. The number of foreclosed properties in poor shape for sale in the neighborhoods depresses house values to the point where the cost of rehab cannot be recovered.

**Recommendation 6.0:** Support more financial education, analyze existing services provided by local nonprofits in this area to answer questions, explain the mortgage process and conduct outreach on homeownership/lending.

**2015 Action Plan:** City and County will conduct an analysis of homebuyer education services provided by local nonprofits to determine whether these services should be enhanced or adapted to better meet the needs of potential homeowners.

Research options to implement a “promotoras” strategy in which community liaisons would be trained to provide information and advocacy to their neighbors.

## **7. Barriers to housing choice for people with disabilities**

Lack of accessible housing and difficulty locating what exists are the primary barriers to housing choice for people with disabilities. Focus groups talked about the lack of accessible housing from their different perspectives. Disability group members said there is little accessible housing, and it is difficult find what is out there. Rental property owners said accessible housing is easy to rent because of the demand. Realtors noted that there is little on their Multiple Listing Service, and accessibility is not searchable on MLS. Some noted that it is very difficult for someone with a voucher to find an accessible unit. In subsidized housing, it is particularly difficult for families to find accessible housing. What little is available is mostly one-bedroom or in senior developments.

### **7.1 People don’t have resources to make modifications.**

The region has an old housing stock and people with disabilities often don’t have the resources to make modifications in the older buildings. The City and County support a non-profit agency to provide accessibility modifications for low- and moderate-income homeowners. Based on the 2009 Analysis of Impediments recommendations, the County began a program to help fund modifications for low- and moderate-income tenants. Funding for this program was reduced to \$25,000 each year for the 2012-14 program years and it is not available to tenants who live within the City of Cincinnati.

Modifying old buildings can be very expensive. More accessible housing would be created naturally if more new affordable housing was being built in the region. New multifamily housing must meet the Fair Housing Act’s basic accessibility requirements and would meet the needs of many of the area’s residents with disabilities. However, very little new affordable housing is being constructed. Low Income Housing Tax Credits and available government grants go primarily to rehab and preserve current affordable housing developments.

**Recommendation 7.1:** Provide funding assistance for low- and moderate-income renters to make accessibility modifications in Cincinnati and the balance of Hamilton County.

**2015 Annual Action Plan:** Implement the Modifications for Mobility program with Housing Repair Services to provide City rental residents with options to make their homes accessible.

County will increase funding for its Modifications for Mobility Program from \$25,000 to \$50,000 annually.

County will provide \$90,000 to the Housing Network of Hamilton County to acquire and rehabilitate a multi-family structure for use by low-income disabled persons.

**7.2 Housing for people with mental disabilities is often opposed by the neighbors because of fear of the residents.**

Recent examples cited by focus group participants were the community opposition to the sober living group homes in Price Hill and to a proposed permanent supportive housing project in Avondale. In both cases, neighbors expressed fear for their children because of the mental disabilities of the residents of the housing. City elected officials have sympathized with the fears of the neighbors to the extent that one City Council member has publically stated that people have a right to decide who will move into their neighborhood.

***Recommendation 7.2:*** Provide support and assistance in working with the neighborhoods to groups providing housing for people with mental disabilities. Train elected officials in the City and County on fair housing, particularly the rights of people with disabilities.

**2015 Annual Action Plan:** Plan training for elected officials. Include elected officials in the City as well as all County jurisdictions.

County will increase funding for its Excel Development Tenant Based Rental Assistance Program which provides rental subsidies to persons with mental disabilities. Funding will be increased from \$127,500 to \$140,000.