ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

CITY OF ALLIANCE
CITY OF CANTON
CITY OF MASSILLON
URBAN STARK COUNTY

January 17, 2012
Mullin & Lonergan Associates, Inc.

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

Stark County HOME Consortium

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1. Introduction

A. Introduction to the Analysis of Impediments

The Stark County HOME Consortium, comprised of the cities of Alliance, Canton and Massillon and the Urban County of Stark County, has prepared an Analysis of Impediments to Fair Housing Choice to satisfy the requirements of the Housing and Community Development Act of 1974, as amended. This act requires that any community receiving Community Development Block Grant (CDBG) funds affirmatively further fair housing. As a result, the cities and Urban County are charged with the responsibility of conducting their CDBG programs in compliance with the federal Fair Housing Act. The responsibility of compliance with the federal Fair Housing Act extends to nonprofit organizations and other entities, which receive federal funds through the entitlements in the Consortium.

Entitlement communities receiving CDBG funds are required to:

- Examine and attempt to alleviate housing discrimination within their jurisdiction
- Promote fair housing choice for all persons
- Provide opportunities for all persons to reside in any given housing development, regardless of race, color, religion, sex, disability, familial status, or national origin
- Promote housing that is accessible to and usable by persons with disabilities, and
- Comply with the non-discrimination requirements of the Fair Housing Act. These requirements can be achieved through the preparation of an Analysis of Impediments to Fair Housing Choice.

The Analysis of Impediments to Fair Housing Choice (AI) is a review of a jurisdiction's laws, regulations, and administrative policies, procedures, and practices affecting the location, availability, and accessibility of housing, as well as an assessment of conditions, both public and private, affecting fair housing choice.

B. Obligation of Urban Counties to Affirmatively Further Fair Housing Choice

In August 2009, Westchester County, NY settled a fair housing lawsuit brought against the County by the Anti-Discrimination Center of Metro New York, Inc. The outcome of this lawsuit is relevant to all HUD urban counties.

This $180 million lawsuit filed in April 2006 charged that Westchester County failed to fulfill its obligation to affirmatively further fair housing and ensure non-discrimination in its programs. Westchester County is an Urban County entitlement under HUD's CDBG and HOME Programs. As a condition of federal funding, all such HUD entitlements certify to HUD each year that they will conduct their entitlement programs in a non-discriminatory manner that affirmatively furthers fair housing in accordance with the Civil Rights Act of 1964 and the federal Fair Housing Act. In making this certification, Westchester County was required to identify impediments to fair housing choice, take action to overcome those impediments, and to maintain records of its analysis and actions.

In the lawsuit, the Center charged that:

- Westchester County is a racially segregated county
- Westchester County's Analysis of Impediments to Fair Housing Choice (AI) was flawed because it considered housing needs based solely on income and failed to fully consider racial segregation and housing needs based on race

- Westchester County failed to inform municipalities receiving CDBG funds of their own obligation to consider the housing needs of persons living outside the communities, not just the needs of residents living within their municipal limits
- Westchester County failed to require municipalities receiving CDBG funds to increase the availability of affordable housing or otherwise affirmatively further fair housing
- As a result of the above, Westchester County made a false claim when it certified to HUD that the County would affirmatively further fair housing.

At issue in this case was not whether Westchester County created affordable housing. In fact, since 1998, the County spent over $50 million in federal and state funds to aid in the construction of 1,370 affordable rental units and another 334 affordable owner units. It was the *geographic location* of the affordable housing units that were created within the County that was the critical factor in the lawsuit.

The Center alleged that the County's AI did not analyze how its placement of affordable housing affected segregation and racial diversity. It concluded that the County assisted the development of affordable housing units in lower income communities and that as a result, it increased the pattern of racial segregation in Westchester County. Furthermore, the suit charged that the County violated its cooperation agreements with local units of government which prohibits expenditures of CDBG funds for activities in communities that do not affirmatively further fair housing within their jurisdiction or otherwise impede the County's action to comply with its fair housing certifications.

Faced with the threat of losing the $180 million lawsuit and being cut off from another $30 million in HUD funding, Westchester County agreed to a settlement with HUD and the Anti-Discrimination Center of Metro New York. Under the terms of the settlement, the County will pay $21.6 million to HUD in non-federal funds. These funds will be deposited in the County's HUD account and used to build new affordable housing units in specified census tracts with populations of less than 3% Black and 7% Hispanic residents. An additional $11 million will be paid to HUD, the Center and its counsel. The County will add $30 million to its capital budget to build affordable housing in non-impacted (i.e., primarily White) areas. It is anticipated that the County will issue bonds to meet its financial obligations under the settlement.

The significance of this legal settlement for urban county entitlements throughout the U.S. is clear. First, *the requirement to affirmatively further fair housing applies to all aspects of county government, not just HUD programs*. Second, the lawsuit confirms that *an urban county has an obligation to ensure that each local unit of government within its boundary affirmatively furthers fair housing*. When an urban county makes this pledge to HUD, it is making the promise not just in its own right but also on behalf of each local unit of government in the county. This does not necessarily mean that each municipality must finance and develop affordable housing, but it does mean that no municipality may impede or obstruct the creation of such housing by other entities. An urban county should provide CDBG and HOME funds to municipalities that affirmatively further fair housing. Furthermore, an urban county should not provide CDBG and HOME funds to municipalities that impede fair housing as such actions undermine the urban county's own obligation to affirmatively further fair housing. Finally, an urban county must take action to eliminate barriers to fair housing wherever they may exist in the county.

C. Fair Housing Choice

Equal and free access to residential housing (housing choice) is a fundamental right that enables members of the protected classes to pursue personal, educational, employment or other goals. Because housing choice is so critical to personal development, fair housing is a goal that government, public officials and private citizens must embrace if equality of opportunity is to become a reality.

The federal Fair Housing Act prohibits discrimination in housing based on a person's race, color, religion, sex, disability, familial status, or national origin. Persons who are protected from discrimination by fair housing laws are referred to as members of the protected classes.

This Analysis encompasses the following five areas related to fair housing choice:

- The sale or rental of dwellings (public and private)
- The provision of financing assistance for dwellings
- Public policies and actions affecting the approval of sites and other building requirements used in the approval process for the construction of publicly assisted housing
- The administrative policies concerning community development and housing activities, which affect opportunities of minority households to select housing inside or outside areas of minority concentration, and
- Where there is a determination of unlawful segregation or other housing discrimination by a court or a finding of noncompliance by the U.S. Department of Housing and Urban Development (HUD) regarding assisted housing in a recipient's jurisdiction, an analysis of the actions which could be taken by the recipient to remedy the discriminatory condition, including actions involving the expenditure of funds made available under 24 CFR Part 570 (i.e., the CDBG program regulations) and/or 24 CFR Part 92 (i.e., the HOME program regulations).

As federal entitlement communities, the Cities of Alliance, Canton and Massillon and the Urban County have specific fair housing planning responsibilities. These include:

- Conducting an Analysis of Impediments to Fair Housing Choice
- Developing actions to overcome the effects of identified impediments to fair housing, and
- Maintaining records to support the jurisdictions' initiatives to affirmatively further fair housing.

HUD interprets these three certifying elements to include:

- Analyzing housing discrimination in a jurisdiction and working toward its elimination
- Promoting fair housing choice for all people
- Providing racially and ethnically inclusive patterns of housing occupancy
- Promoting housing that is physically accessible to, and usable by, all people, particularly individuals with disabilities, and
- Fostering compliance with the nondiscrimination provisions of the Fair Housing Act.

This Analysis will:

- Evaluate population, household, income and housing characteristics by protected classes in each of the jurisdictions
- Evaluate public and private sector policies that impact fair housing choice
- Identify blatant or de facto impediments to fair housing choice, where any may exist, and
- Recommend specific strategies to overcome the effects of any identified impediments.

HUD defines an impediment to fair housing choice as any actions, omissions, or decisions that restrict, or have the effect of restricting, the availability of housing choices, based on race, color, religion, sex, disability, familial status, or national origin.

This Analysis serves as the basis for fair housing planning, provides essential information to policy makers, administrative staff, housing providers, lenders, and fair housing advocates, and assists in building public support for fair housing efforts. The elected governmental bodies are expected to review and approve the Analysis and use it for direction, leadership, and resources for future fair housing planning.

The Analysis will serve as a "point-in-time" baseline against which future progress in terms of implementing fair housing initiatives will be evaluated and recorded.

D. The Federal Fair Housing Act

i. What housing is covered?

The federal Fair Housing Act covers most housing. In some circumstances, the Act exempts owner-occupied buildings with no more than four units, single family housing sold or rented without the use of a broker, and housing operated by organizations and private clubs that limit occupancy to members.

ii. What does the Fair Housing Act prohibit?

a. In the Sale and Rental of Housing

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

- Refuse to rent or sell housing
- Refuse to negotiate for housing
- Make housing unavailable
- Deny a dwelling
- Set different terms, conditions or privileges for the sale or rental of a dwelling
- Provide different housing services or facilities
- Falsely deny that housing is available for inspection, sale or rental
- For profit, persuade owners to sell or rent (blockbusting), or
- Deny anyone access to or membership in a facility or service (such as a multiple listing service) related to the sale or rental of housing.

b. In Mortgage Lending

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

- Refuse to make a mortgage loan
- Refuse to provide information regarding loans
- Impose different terms or conditions on a loan, such as different interest rates, points, or fees
- Discriminate in appraising property
- Refuse to purchase a loan, or
- Set different terms or conditions for purchasing a loan.

c. Other Prohibitions

It is illegal for anyone to:

- Threaten, coerce, intimidate or interfere with anyone exercising a fair housing right or assisting others who exercise that right

- Advertise or make any statement that indicates a limitation or preference based on race, color, religion, sex, disability, familial status, or national origin. This prohibition against discriminatory advertising applies to single family and owner-occupied housing that is otherwise exempt from the Fair Housing Act.

iii. Additional Protections for the Disabled

If someone has a physical or mental disability (including hearing, mobility and visual impairments, chronic alcoholism, chronic mental illness, AIDS, AIDS Related Complex and mental retardation) that substantially limits one or more major life activities, or has a record of such a disability, or is regarded as having such a disability, a landlord may not:

- Refuse to let the disabled person make reasonable modifications to a dwelling or common use areas, at the disabled person's expense, if necessary for the disabled person to use the housing. Where reasonable, the landlord may permit changes only if the disabled person agrees to restore the property to its original condition when he or she moves.
- Refuse to make reasonable accommodations in rules, policies, practices or services if necessary for the disabled person to use the housing.

For example, a building with a "no pets" policy must make a reasonable accommodation and allow a visually impaired tenant to keep a guide dog.

iv. Significant Recent Changes

The Housing for Older Persons Act of 1995 (HOPA) makes several changes to the age 55 and older exemption. Since the 1988 Amendments, the Fair Housing Act has exempted from its familial status provisions properties that satisfy the Act's age 55 and older housing condition. First, it eliminates the requirement that housing for persons age 55 and older have "significant facilities and services" designed for the elderly. Second, HOPA establishes a "good faith reliance" immunity from damages for persons who in good faith believe that the age 55 and older exemption applies to a particular property, if they do not actually know that the property is not eligible for the exemption and if the property has formally stated in writing that it qualifies for the exemption.

HOPA retains the requirement that senior housing must have one person who is 55 years of age or older living in at least 80% of its occupied units. It also still requires that senior housing publish and follow policies and procedures that demonstrate the intent to be housing for persons 55 years and older.

An exempt property will not violate the Fair Housing Act if it includes families with children, but it does not have to do so. Of course, the property must meet the Act's requirements that at least 80% of its occupied units have at least one occupant who is 55 or older, and that it publish and follow policies and procedures that demonstrate the intent to be housing for persons age 55 and older housing.

v. Requirements for New Buildings

In buildings that are ready for first occupancy after March 13, 1991 and have an elevator and four or more units:

- Public and common areas must be accessible to persons with disabilities

- Doors and hallways must be wide enough for wheelchairs
- All units must have:
- An accessible route into and through the unit
- Accessible light switches, electrical outlets, thermostats and other environmental controls
- Reinforced bathroom walls to allow later installation of grab bars, and
- Kitchens and bathrooms that can be used by people in wheelchairs.

If a building with four or more units has no elevator and will be ready for first occupancy after March 13, 1991, these standards apply to ground floor units. These requirements for new buildings do not replace any more stringent standards in state or local law.

vi. Housing Opportunities for Families

Unless a building or community qualifies as housing for older persons, it may not discriminate based on familial status. That is, it may not discriminate against families in which one or more children under the age 18 live with:

- A parent or
- A person who has legal custody of the child or children or
- The designee of the parent or legal custodian, with the parent or custodian's written permission.

Familial status protection also applies to pregnant women and anyone securing legal custody of a child under age 18.

Housing for older persons is exempt from the prohibition against familial status discrimination if:

- The HUD Secretary has determined that it is specifically designed for and occupied by elderly persons under a federal, state or local government program, or
- It is occupied solely by persons who are 62 or older, or
- It houses at least one person who is 55 or older in at least 80% of the occupied units, and adheres to a policy that demonstrates the intent to house persons who are 55 or older, as previously described.

A transition period permits residents on or before September 13, 1988 to continue living in the housing, regardless of their age, without interfering with the exemption.

E. The Ohio Civil Rights Law

The Ohio Civil Rights Law (Chapter 4112 of the Ohio Revised Code), as amended, prohibits housing discrimination based on race, color, religion, sex, military status, familial status, ancestry, disability or national origin.

Section 4112.02(H) of the ORC describes the unlawful acts of discrimination related to fair housing. These include:

- Discriminatory real estate practices, including refusal to sell or lease housing accommodations to members of the protected classes
- Discrimination in the terms and conditions of real estate transactions
- Discrimination in the lending of money to acquire, construct, rehabilitate, repair or maintain housing

- Discrimination in the refusal to make reasonable accommodation
- Advertising or marketing real estate in a way that makes members of the protected classes feel unwelcome or not solicited
- Making an inquiry concerning race, color, religion, sex, military status, familial status, ancestry, disability or national origin.
-

Section 4112.03 of the ORC establishes the Ohio Civil Rights Commission (OCRC). The Commission has statutory authority to:

- Initiate investigations of discriminatory practices
- Formulate policies to effectuate the purposes of Section 4112 of the Ohio Revised Code, and make recommendations to agencies and offices of the state or local subdivisions of government to effectuate such policies
- Make periodic surveys of the existence and effect of discrimination because of race, color, religion, sex, military status, national origin, handicap, age, ancestry or familial status on the enjoyment of civil rights by persons within the state
- Receive progress reports from agencies, instrumentalities, institutions, boards, commissions, and other entities of this state or any of its political subdivisions and their agencies, instrumentalities, institutions, boards, commissions, and other entities regarding affirmative action programs for the employment of persons against whom discrimination is prohibited
- Prepare a comprehensive educational program, in cooperation with the Ohio Department of Education, for the students of Ohio's public schools and for all other residents of Ohio that is designed to: eliminate prejudice on the bases of race, color, religion, sex, military status, national origin, handicap, age, ancestry or familial status, further good will amongst those groups and emphasize the origin of prejudice against those groups and its harmful effects.

The Ohio Civil Rights Law describes unlawful acts of discrimination and sets forth the procedures for aggrieved parties to file complaints. The act also describes the OCRC process for investigating and processing complaints.

F. City of Canton Fair Housing Code

The City of Canton's Fair Housing Code, adopted in 2002, has a slightly more limited definition of members of the protected classes than the Ohio Civil Rights Act. Canton's Fair Housing Code states that it is the policy of the City "to assure all its residents of equal and fair housing opportunities regardless of race, color, religion, national origin, sex, ancestry, handicap or familial status." The Code also establishes Canton's Fair Housing Commission to receive and investigate allegations of housing discrimination, among other duties.

G. City of Massillon Fair Housing Ordinance

The City of Massillon adopted its fair housing ordinance in 1991. The ordinance extends the definition of protected classes to include ancestry, age and marital status, in addition to the protected classes included in the Fair Housing Act. The City's Fair Housing Commission ensures the Ordinance is appropriately implemented by monitoring the City's housing programs, processing fair housing complaints, and investigating housing and segregation patterns in the City.

Figure 1-1 lists the classes of protection offered by the laws and ordinances covering the jurisdictions in the Consortium.

Figure 1-1
Comparison of Statutory Protections from Housing Discrimination

Protected Class	Federal Fair Housing Act	Ohio Civil Rights Act	Canton Fair Housing Code	Massillon Fair Housing Ordinance
Race	•	•	•	•
Color	•	•	•	•
National Origin	•	•	•	•
Religion	•	•	•	•
Sex	•	•	•	•
Familial Status	•	•	•	•
Handicap/Disability Status	•	•	•	•
Ancestry		•	•	•
Marital Status				•
Age (40 and older)				•
Military/Veteran Status		•		

H. Comparison of Accessibility Standards

There are several standards of accessibility that are referenced throughout the AI. These standards are listed below along with a summary of the features within each category or a direct link to the detailed standards.

i. Fair Housing Act

These standards are listed in section C.v. above.

ii. Americans with Disabilities Act (ADA)

ADA standards are required for accessibility to places of public accommodation and commercial facilities by individuals with disabilities. These guidelines are to be applied during the design, construction, and alteration of such buildings and facilities to the extent required by regulations issued by federal agencies, including the Department of Justice, under the Americans with Disabilities Act of 1990. A complete description of the guidelines can be found at *www.ada.gov/stdspdf.htm*.

iii. Uniform Federal Accessibility Standards (UFAS)

UFAS accessibility standards are required for facility accessibility by physically handicapped persons for Federal and federally-funded facilities. These standards are to be applied during the design, construction, and alteration of buildings and facilities to the extent required by the Architectural Barriers Act of 1968, as amended. A complete description of the guidelines can be found at *www.access-board.gov/ufas/ufas-html/ufas.htm*.

iv. Visitability Standards

The term “visitability” refers to single-family housing designed in such a way that it can be lived in or visited by people with disabilities. A house is visitable when it meets three basic requirements:

- At least one no-step entrance
- Doors and hallways wide enough to navigate a wheelchair through, and

- A bathroom on the first floor big enough to get into in a wheelchair, and close the door.

v. Universal Design

Universal design is the design of products and environments to be usable by all people, to the greatest extent possible, without adaptation or specialized design. Seven principles guide Universal Design. These include:

- Equitable use (e.g., make the design appealing to all users)
- Flexibility in use (e.g., accommodate right- or left-handed use)
- Simple and intuitive use (e.g., eliminate unnecessary complexity)
- Perceptible information (e.g., provide compatibility with a variety of techniques or devices used by people with sensory limitations)
- Tolerance for error (e.g., provide fail-safe features)
- Low physical effort (e.g., minimize repetitive actions)
- Size and space for approach and use (e.g., accommodate variations in hand and grip size).

I. Methodology

The firm of Mullin & Lonergan Associates, Inc. (M&L) was retained as consultants to conduct the Analysis of Impediments to Fair Housing Choice. M&L utilized a comprehensive approach to complete the Analysis involving the Stark County Consortium. The following sources were utilized:

- The most recently available demographic data regarding population, household, housing, income, and employment at the census tract and municipal level
- Public policies affecting the siting and development of housing
- Administrative policies concerning housing and community development
- Financial lending institution data from the Home Mortgage Disclosure Act (HMDA) database
- Agencies that provide housing and housing related services to members of the protected classes
- Consolidated Plans, Annual Plans, and CAPERs from the Cities and Urban County
- The 2002 Analysis of Impediments to Fair Housing Choice for the Stark County Consortium
- Fair housing complaints filed with HUD and the Ohio Civil Rights Commission
- Real estate advertisements from *The Canton Repository, The Massillon Independent,* and *The Alliance Review*
- 2000 CHAS data tables available from HUD
- 2000 residential segregation data available from Census Scope
- Interviews and focus group sessions conducted with agencies and organizations that provide housing and housing related services to members of the protected classes.

J. Using Census Data

Because statistics in census data products are based on the collection, tabulation, editing, and handling of questionnaires, errors in the data are possible. In addition to errors occurring during data collection, much of the census data is based on Summary File 3 (SF3) sample data rather than Summary File 1 (SF1) data, which is 100-percent data. Each data set is subject to sampling error and non-sampling error, respectively. Non-sampling error includes confidentiality edits applied by the Census Bureau to assure that data does not disclose information about specific individuals, households, or housing units. Because of sampling and non-sampling errors, there may be discrepancies in the reporting of similar type of data. These discrepancies do not negate the usefulness of the census data.

K. Development of the AI

i. Lead Agency

The Stark County Regional Planning Commission (SCRPC) was the lead agency for the preparation and implementation of the AI. Staff from the four participating jurisdictions identified and invited numerous stakeholders to participate in the process for the purpose of developing a thorough analysis with a practical set of recommendations to eliminate impediments to fair housing choice, where identified.

ii. Agency Consultation

The four participating jurisdictions engaged in an extensive consultation process with local public agencies, nonprofit organizations and other interested entities in an effort to develop a community planning process for the AI. A series of written questionnaires were mailed to many of the interviewees and detailed lists of issues were developed for the focus group sessions and interviews.

From June to September 2010, the consulting team conducted a series of focus group sessions and individual interviews to identify current fair housing issues impacting the various agencies and organizations and their clients. Comments received through these meetings and interviews are incorporated throughout the AI, where appropriate.

A list of the stakeholders identified to participated in the AI process is included in Appendix A.

L. The Relationship between Fair Housing and Affordable Housing

As stated in the Introduction, fair housing choice is defined as the ability of persons, regardless of race, color, religion, sex, disability, familial status, or national origin, of similar income levels to have available to them the same housing choices. In Ohio, this protection also is extended to persons based on ancestry and military/veteran status. Persons who are protected from discrimination by fair housing laws are referred to as members of the protected classes.

This AI analyzes a range of fair housing issues regardless of a person's income. To the extent that members of the protected classes tend to have lower incomes, then access to fair housing is related to affordable housing. In many areas across the U.S., a primary impediment to fair housing is a relative absence of affordable housing. Often, however, the public policies implemented in towns and cities create, or contribute to, the lack of affordable housing in these communities, thereby disproportionately affecting housing choice for members of the protected classes.

This document goes well beyond an analysis of the adequacy of affordable housing in the Stark County Consortium. This AI defines the relative presence of members of the protected classes within the context of factors that influence the ability of the protected classes to achieve equal access to housing and related services.

2. Regional Profile

A. Demographic Profile

i. Population Trends

Shifting population patterns across Stark County since 1960 indicate that to some extent, the urban centers of the region have emptied into its suburbs. All of the population growth in the region has been in the Urban County, which includes all of Stark County outside of the Cities of Alliance, Canton, and Massillon. The Urban County's population has increased 49.5% over the past half century. By contrast, the cities of Alliance and Canton have lost residents every decade since 1960. In Canton, the total population decreased 32.5% during this period, with the most dramatic losses occurring between 1970 and 1990. Alliance's population decreased 20.6%, while Massillon's population remained relatively stable.

In total, the population across the region has increased 11.6% since 1960. Most of this growth occurred during the 1960s, when the population increased 9.4%. After a fluctuation in the population between 1970 and 2000, the region's population stabilized just below 380,000 residents.

Figure 2-1
Population Trends, 1960 to 2010

	1960	1970	1980	1990	2000	2010	% Change 1990-2010
Regional total	**340,345**	**372,210**	**378,823**	**367,003**	**378,988**	**379,682**	**11.6%**
Urban County*	167,116	203,071	229,221	228,442	243,257	249,771	49.5%
Alliance City	28,362	26,547	24,315	23,393	23,229	22,507	-20.6%
Canton City	113,631	110,053	94,730	84,161	81,118	76,653	-32.5%
Massillon City	31,236	32,539	30,557	31,007	31,384	30,751	-1.6%

**Urban County is Stark County exclusive of the Cities of Alliance, Canton, and Massillon*

Source: Ohio Department of Development, U.S. Census Bureau, DemographicsNow

Figure 2-2
Population Trends, 1960 to 2010

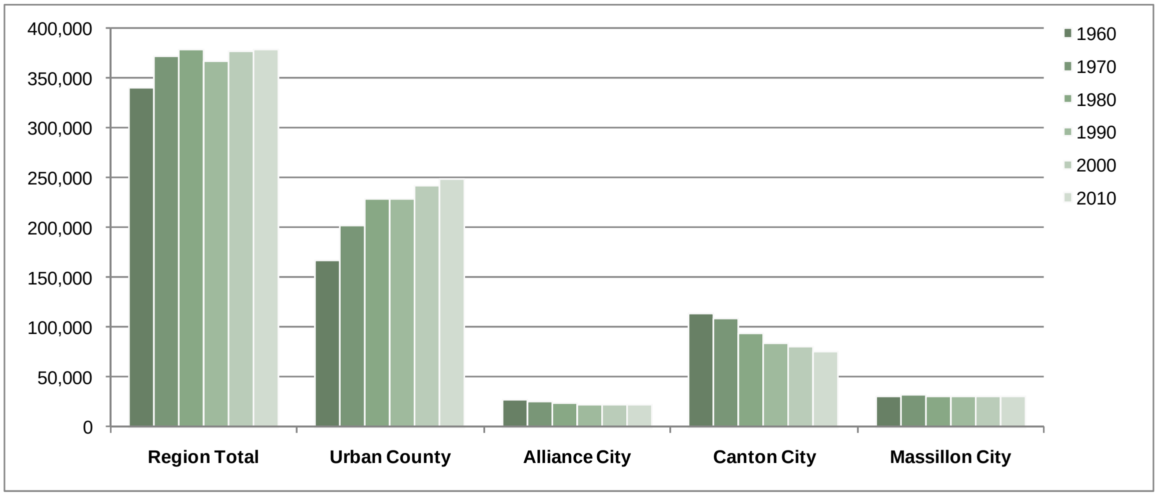


Figure 2-3
Population Trends by Race, 1990 to 2010

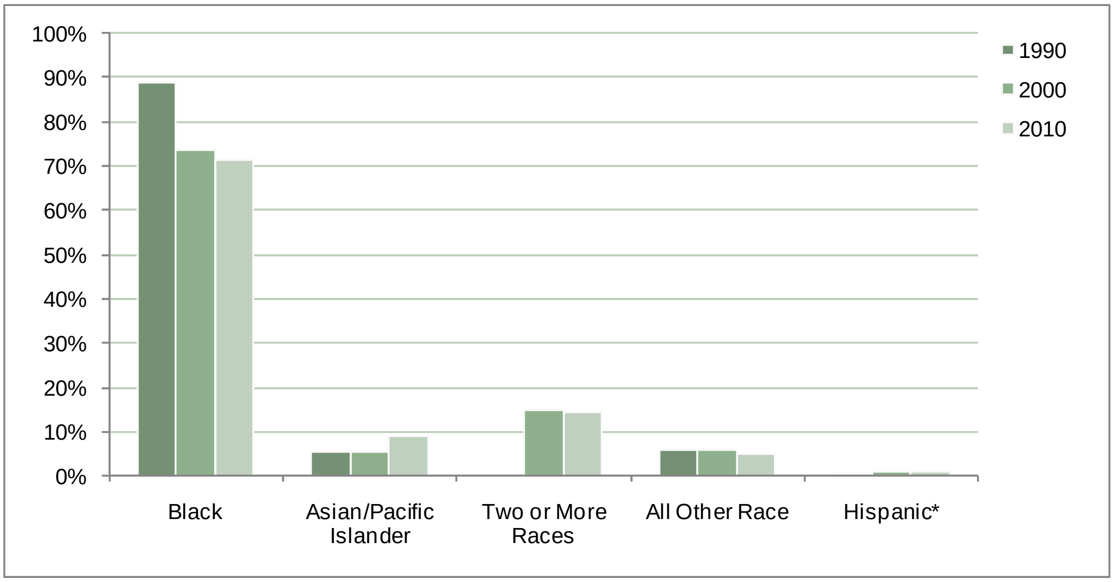
	1990		2000		2010		% Change 1990-2010
	#	%	#	%	#	%	
Regional Total	**367,003**	**100.0%**	**378,988**	**100.0%**	**379,682**	**100.0%**	**3.5%**
White Population	338,068	92.1%	340,701	89.9%	339,815	89.5%	0.5%
Non-White Population	28,935	7.9%	38,287	10.1%	39,867	10.5%	37.8%
Black	25,715	7.0%	28,201	7.4%	28,458	7.5%	10.7%
Amer. Indian/Alaska Native	1,058	0.3%	1,101	0.3%	854	0.2%	-19.3%
Asian / Pacific Islander	1,611	0.4%	2,116	0.6%	3,636	1.0%	125.7%
Some Other Race	551	0.2%	1,060	0.3%	1,155	0.3%	109.6%
Two or More Races	---	---	5,809	1.5%	5,764	1.5%	-0.8%
Hispanic	2,649	0.7%	3,572	0.9%	4,266	1.1%	61.0%

Source: U.S. Census Bureau, DemographicsNow

The White population in the region remained stable between 1990 and 2010, while the non-White population increased 37.8%. Minorities accounted for 10.5% of the total population in 2010 compared to 7.0% in 1990. Blacks remain the largest minority group and comprised 71.4% of the non-White population in 2010. However, the largest growth has been among Asian/Pacific Islanders and Persons of Some Other Race. Both of these subpopulations more than doubled between 1990 and 2010, and in 2010 they accounted for 12% of the non-White population.

The Hispanic population also increased during this period, from 2,649 to 4,266.

Figure 2-4
Changes in the Racial and Ethnic Characteristics of the Minority Population, 1990-2010



*Hispanic ethnicity is measured exclusively of race

Observation

Minorities increased from 7% to 10.5% of the total population between 1990 and 2010.

Blacks remain the largest minority group. However, the fastest-growing segments of the population have been Asians/Pacific Islanders and persons in the "some other race" category. These two groups grew 125.7% and 109.6%, respectively.

ii. Residential Segregation Patterns

Residential segregation is a measure of the degree of separation of racial or ethnic groups living in a neighborhood or community. Typically, the pattern of residential segregation involves the existence of predominantly homogenous, White suburban communities and low-income minority inner-city neighborhoods. A potential impediment to fair housing is created where either latent factors, such as attitudes, or overt factors, such as real estate practices, limit the range of housing opportunities for minorities. A lack of racial or ethnic integration in a community creates other problems, such as reinforcing prejudicial attitudes and behaviors, narrowing opportunities for interaction, and reducing the degree to which community life is considered harmonious. Areas of extreme minority isolation often experience poverty and social problems at rates that are disproportionately high. Racial segregation has been linked to diminished employment prospects, poor educational attainment, increased infant and adult mortality rates and increased homicide rates.

The distribution of racial or ethnic groups across a geographic area can be analyzed using an index of dissimilarity. This method allows for comparisons between subpopulations, indicating how much one group is spatially separated from another within a community. The index of dissimilarity is rated on a scale from 0 to 100, in which a score of 0 corresponds to perfect integration and a score of 100 represents total segregation.[1] The index is typically interpreted as the percentage of the minority population (in this instance, the Black population) that would have to move in order for a community or neighborhood to achieve full integration. A dissimilarity index of less than 30 indicates a low degree of segregation, while values between 30 and 60 indicate moderate segregation, and values above 60 indicate high segregation.

The Stark County region is moderately segregated. The Urban County is the least segregated of the jurisdictions in the region, with a dissimilarity index of 39.1. Of the three cities, Massillon is the most segregated, with a dissimilarity index of 56.6. Stark County as a whole has the highest rate of segregation. According to the dissimilarity index, 57.8% of Black residents would have to move elsewhere within Stark County in order to achieve full integration.

Figure 2-5
Dissimilarity Index Rankings, 2000

Rank	City	Black Population	White Population	Total Population	Dissimilarity Index
1	Urban County*	4,517	213,757	222,203	39.1
2	Alliance	2,287	20,099	23,458	48.0
3	Canton	16,875	59,653	80,806	50.0
4	Massillon	2,934	27,422	31,325	56.6
5	Stark County	27,039	339,010	378,098	57.8

**Urban County is Stark County exclusive of the Cities of Alliance, Massillon, and Canton*
Source: CensusScope; U.S. Census Bureau 2000 Census; University of Michigan Racial Residential Segregation Measurement Project; Calculations by Mullin & Lonergan Associates, Inc.

Observation

The region is moderately segregated, with dissimilarity indices ranging from 39.1 to 57.8.

According to dissimilarity index data, 57.8% of Black persons would have to move to a different location in Stark County in order to achieve full integration. However, the dissimilarity indices for the individual jurisdictions indicate varying degrees of segregation.

[1] The index of dissimilarity is a commonly used demographic tool for measuring inequality. For a given geographic area, the index is equal to **1/2 Σ ABS [(b/B)-(a/A)]**, where b is the subgroup population of a census tract, B is the total subgroup population in a city, a is the majority population of a census tract, and A is the total majority population in the city. ABS refers to the absolute value of the calculation that follows.

iii. Race/Ethnicity and Income

Household income is one of several factors used to determine a household's eligibility for a home mortgage loan or a rental unit. Across the region, there were significant differences in the earnings of Whites compared to minorities. In Stark County, the median household income for Whites was more than twice that for Blacks; a similar trend is noted in Canton. In Massillon, median household income for Blacks was equivalent to 69.2% that of Whites. The disparity in incomes was smallest in Alliance, where the median income for Blacks was equivalent to almost 93% of Whites.

In Stark County and the Cities of Alliance and Canton, Hispanics had higher median incomes than Blacks. In Canton, the median household income for Hispanics was 5.8% greater than that of Whites and twice as great as the median income of Blacks. Median income for Hispanics was equivalent to Whites in Alliance, and in Stark County on a whole, Hispanics earned more than Blacks but substantially less that Whites.

Poverty rates were also substantially greater among Blacks and Hispanics. In Stark County, Hispanics were twice as likely and Blacks four times as likely as Whites to live in poverty in 2008. In all three cities, Blacks had poverty rates at least twice that of Whites, as detailed in Figure 2-6.

Figure 2-6
Median Household Income and Poverty Rates by Race/Ethnicity, 2008

	Median Household Income	Poverty Rate
Stark County	**$45,306**	**11.9%**
Whites	$47,714	9.4%
Blacks	$22,686	37.4%
Hispanics	$33,750	20.3%
Alliance City	**$32,447**	**15.0%**
Whites	$32,652	12.4%
Blacks	$30,327	27.4%
Hispanics	$32,636	---
Canton City	**$28,679**	**25.5%**
Whites	$34,156	18.0%
Blacks	$17,194	46.7%
Hispanics	$36,147	---
Massillon City	**$40,193**	**14.1%**
Whites	$41,490	11.5%
Blacks	$28,717	35.2%

Source: U.S. Census Bureau, 2006-2008 American Community Survey (B19013, B19013A, B19013B, B19013D, B19013I, B17001, B17001A, B17001B)

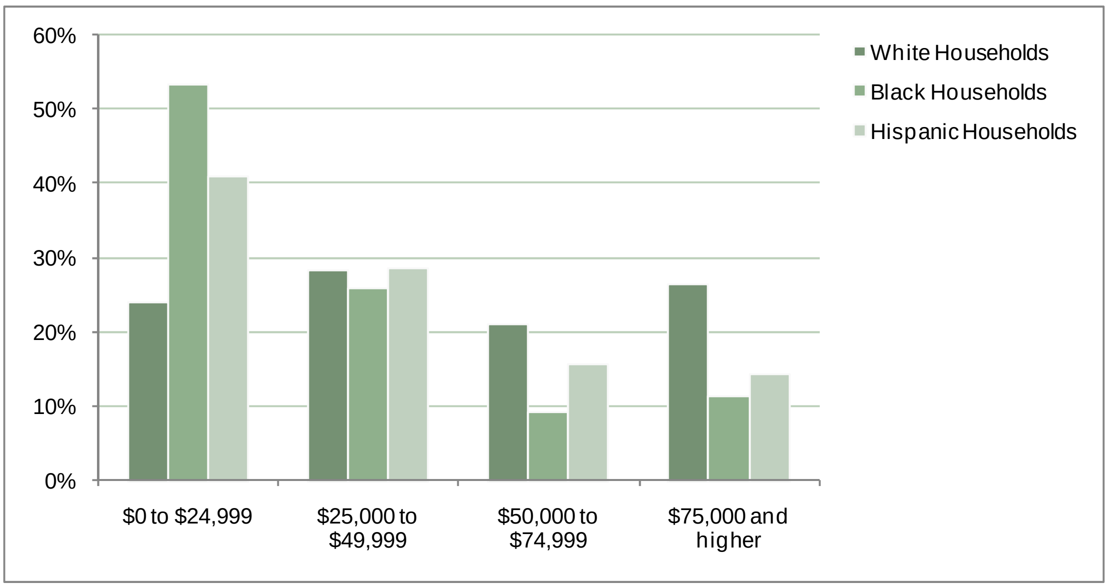
A review of household income distribution also shows a disparity among households. In Stark County in 2008, over half of Black households and 41.1% of Hispanic households earned less than $25,000 annually. By comparison, less than one quarter of White households fell into this income category. At the other end of the spectrum, White households were twice as likely as Black and Hispanic households to earn more than $75,000 annually.

Figure 2-7
Household Income Distribution by Race and Ethnicity in Stark County, 2008

	Total	$0 to $24,999		$25,000 to $49,999		$50,000 to $74,999		$75,000 and higher	
		#	%	#	%	#	%	#	%
All Households	**151,123**	**40,280**	**26.7%**	**42,029**	**27.8%**	**30,379**	**20.1%**	**38,435**	**25.4%**
White Households	136,638	32,993	24.1%	38,728	28.3%	29,011	21.2%	36,356	26.6%
Black Households	11,447	6,104	53.3%	2,964	25.9%	1,061	9.3%	1,318	11.5%
Hispanic Households	1,109	456	41.1%	319	28.8%	175	15.8%	159	14.3%

Source: U.S. Census Bureau, 2006-2008 American Community Survey (C19001, C19001A, C19001B, C19001D, C19001I)

Figure 2-8
Household Income Distribution by Race and Ethnicity in Stark County, 2008



Observation

Blacks and Hispanics experienced poverty at significantly greater rates than Whites in 2008.

In Stark County, Blacks and Hispanics had poverty rates of 37.4% and 20.3%, respectively, compared to 9.4% for Whites. Consequently, Black and Hispanic households will have a more difficult time finding affordable housing in the region.

iv. Disability and Income

As defined by the Census Bureau, a disability is a long-lasting physical, mental, or emotional condition that can make it difficult for a person to do activities such as walking, climbing stairs, dressing, bathing, learning, or remembering. This condition can also impede a person from being able to go outside the home alone or to work at a job or business.

The Fair Housing Act prohibits discrimination based on physical, mental or emotional handicap, provided "reasonable accommodation" can be made. Reasonable accommodation may include changes to address the needs of disabled persons, including adaptive structural (e.g., constructing an entrance ramp) or administrative changes (e.g., permitting the use of a service animal). In the region, 17.7% of the population 5 years and older reported at least one type of disability in 2000.

Figure 2-9
Poverty by Disability Status, 2000

	% of Population with Disability	% Living in Poverty	
		With Disabilites	Without Disabilites
Regional total	**17.7%**	**14.2%**	**7.4%**
Urban County*	15.5%	8.2%	4.1%
Alliance City	22.0%	19.3%	16.2%
Canton City	22.1%	25.2%	15.8%
Massillon City	20.9%	15.4%	8.6%

**Urban County is Stark County exclusive of the Cities of Alliance, Canton, and Massillon*

Source: U.S. Census Bureau, 2000 Census, SF-3 (P31, PCT34)

According to the National Organization on Disabilities, a significant income gap exists for persons with disabilities, given their lower rate of employment. In Stark County, persons with disabilities are more likely than persons without disabilities to live in poverty. In 2000, 14.2% of persons with disabilities lived in poverty compared to 7.4% of persons without disabilities.

Observation

Persons with disabilities were more likely to live in poverty than persons without disabilities.

Among all persons with a disability in 2000, 14.2% lived in poverty, compared to 7.4% of persons without a disability.

v. Familial Status and Income

The Census Bureau divides households into family and non-family households. Family households are married couple families with or without children, single-parent families and other families made up of related persons. Non-family households are either single persons living alone, or two or more non-related persons living together.

Women have protection under Title VIII of the Civil Rights act of 1968 against discrimination in housing. Protection for families with children was added in the 1988 amendments to Title VIII. Except in limited circumstances involving elderly housing and owner-occupied buildings of one to four units, it is unlawful to refuse to rent or sell to families with children.

The total number of households in the region increased 8.4% between 1990 and 2008. The number of married-couple households remained relatively stable, while the number of female-headed and male-headed households increased 36.5% and 61.1%, respectively.

Among families with children, the most growth has been among single-parent families. Female-headed households with children increased 47.9%, from 2.8% to 3.8% of all households, and male-headed households with children more than doubled during this period. Comparatively, married-couple children with families decreased from 26.8% of all households in 1990 to 19.3% in 2008.

Figure 2-10
Female-headed Households and Households with Children, 1990-2008

	1990		2000		2008	
	#	%	#	%	#	%
Total Households	**139,392**	**100.0%**	**148,323**	**100.0%**	**151,123**	**100.0%**
Family Households	102,070	73.2%	103,069	69.5%	101,282	67.0%
Married-couple family	83,610	60.0%	81,179	54.7%	76,168	50.4%
With Children	37,291	26.8%	34,134	23.0%	29,220	19.3%
Without Children	46,319	33.2%	47,045	31.7%	46,948	31.1%
Female-Headed Households	**7,348**	**5.3%**	**8,962**	**6.0%**	**10,029**	**6.6%**
With Children	**3,866**	**2.8%**	**4,725**	**3.2%**	**5,717**	**3.8%**
Without Children	6,406	4.6%	7,056	4.8%	7,141	4.7%
Male-Headed Household	4,028	2.9%	5,467	3.7%	6,491	4.3%
With Children	1,698	1.2%	2,925	2.0%	3,925	2.6%
Without Children	2,230	1.6%	2,542	1.7%	2,566	1.7%
Non-family and 1-person Households	37,322	26.8%	45,254	30.5%	49,841	33.0%

Sources: U.S. Census Bureau, 1990 (SFT-3, P019), Census 2000 (SF-3, P10); 2006-2008 American Community Survey (B11001, B11003)

Female-headed households with children often experience difficulty in obtaining housing, primarily as a result of lower-incomes and the unwillingness of some landlords to rent their units to families with children. In Stark County, female-headed households with children accounted for 55.6% of all families living in poverty, although they comprised only 12.7% of all families.[2] Among female-headed households with children, 42.5% were living in poverty in 2008, compared to 21.3% of male-headed households with children and only 4.8% of married-couple households with children.

Observation

Female-headed households with children were more likely to live in poverty.

Female-headed households with children accounted for more than half of all families living in poverty across the region. Consequently, securing affordable housing will be especially difficult for this segment of the population.

[2] U.S. Census Bureau, 2006-2008 American Community Survey (C17010)

vi. Ancestry and Income

It is illegal to refuse the right to housing based on place of birth or ancestry. Census data on native and foreign-born populations in the region revealed that in 2008, 2% of residents were foreign-born.[3]

Throughout the region, families with at least one foreign-born parent were slightly less likely to have incomes less than 200% of the poverty level. Among families with children who were living with one or more foreign-born parents, 36.9% were living in households with incomes of less than 200% of the poverty level compared to 37.7% of families with only native parents. Details on the foreign-born population for the individual jurisdictions are in Figure 2-11.

Figure 2-11
Ratio of Income by Nativity, 2008

	% Foreign Born	% Living under 200% of Poverty Level	
		One or more Foreign-Born Parents	Only Native Parents
Regional total	**2.0%**	**36.9%**	**37.7%**
Urban County*	2.3%	26.5%	34.4%
Alliance City	1.3%	100.0%	65.7%
Canton City	1.9%	43.0%	65.4%
Massillon City	0.7%	29.6%	39.6%

**Urban County is Stark County exclusive of the Cities of Alliance, Canton, and Massillon*

Source: U.S. Census Bureau, 2006-2008 American Community Survey (C05002, C05010)

Persons with limited English proficiency (LEP) are defined by the federal government as persons who have a limited ability to read, write, speak or understand English. HUD issued its guidelines on how to address the needs of persons with LEP in January 2007. HUD uses the prevalence of persons with LEP to identify the potential for impediments to fair housing choice due to their inability to comprehend English. Persons with LEP may encounter obstacles to fair housing by virtue of language and cultural barriers within their new environment. To assist these individuals, it is important that a community recognizes their presence and the potential for discrimination, whether intentional or inadvertent, and establishes policies to eliminate barriers. It is also incumbent upon HUD entitlement communities to determine the need for language assistance and comply with Title VI of the Civil Rights Act of 1964.

In 2008, 4,169 residents spoke English less than "very well" in Stark County. Of these, 35.4% were native Spanish-speakers and 44.4% spoke another Indo-European language.

[3] U.S. Census Bureau, 2006-2008 American Community Survey (C05002)

Figure 2-12
Persons with LEP in Stark County, 2008

Language Group	Number of LEP Persons
Spanish	1,474
Other Indo-European language	1,849
Asian or Pacific Island language	619
Other	227

Source: 2006-2008 American Community Survey (B16005)

Observation

Across the County, there were more than 1,000 limited-English speakers of two language groups, Spanish and Indo-European languages.

The County should consider undertaking the four-factor analysis outlined in the Federal Register of January 22, 2007, and at *www.lep.gov* to determine the extent to which the translation of vital documents is necessary to assist persons with limited English proficiency (LEP) in accessing the Urban County's federal entitlement programs.

vii. Protected Class Status and Unemployment

In 2008, unemployment in Stark County was 7.1%, which was on par with Ohio's rate of 7.0%. Blacks in the County had a substantially higher unemployment rate, more than three times that of Whites. Among Blacks, the unemployment rate was 19.6% compared to 6.1% among Whites. Sample sizes for other minority populations were too small to be included in the Census data.

Figure 2-13
Civilian Labor Force, 2008

	Ohio Total	%	Stark County Total	%
Total Civilian Labor Force (CLF)	**5,906,242**	**100%**	**196,756**	**100%**
Employed	5,490,147	93.0%	182,735	92.9%
Unemployed	416,095	7.0%	14,021	7.1%
Male CLF	**3,079,988**	**100%**	**101,088**	**100%**
Employed	2,853,623	92.7%	**93,260**	92.3%
Unemployed	226,365	7.3%	**7,828**	7.7%
Female CLF	**2,826,254**	**100%**	**95,668**	**100%**
Employed	2,636,524	93.3%	89,475	93.5%
Unemployed	189,730	6.7%	6,193	6.5%
White CLF	**5,071,904**	**100%**	**180,019**	**100%**
Employed	4,766,453	94.0%	168,958	93.9%
Unemployed	305,451	6.0%	11,061	6.1%
Black CLF	**619,629**	**100%**	**12,343**	**100%**
Employed	526,938	85.0%	9,926	80.4%
Unemployed	92,691	15.0%	2,417	19.6%

Source: U.S. Census Bureau, 2006-2008 American Community Survey (C23001, C23002A, C23002B, C23002D, C23002I)

Observation

Blacks were more than three times as likely as Whites to be unemployed in 2008.

In Stark County, one in five Blacks was unemployed in 2008, compared to 6.1% of Whites. Higher unemployment, whether temporary or permanent, will mean less disposable income for housing expenses.

B. Housing Market

i. Housing Inventory

The total housing stock in the region increased 12.8% between 1990 and 2009. Most of this growth occurred in the Urban County, mirroring the population trends of the same period, and Massillon experienced a gain of 14.1%. Growth in Alliance and Canton was more modest, at 2.9% and 3.4%, respectively. Notably, the region's total supply of units was more concentrated in cities in 1990, when 40.5% of all housing was in Alliance, Canton or Massillon. In 2009, 38% of all housing was in one of these three cities. This is primarily due to the faster pace of development in suburban areas, but also accounts for the loss of older, deteriorating urban stock. In Canton, for instance, there was a net loss of 1,050 units between 1990 and 2000.

Figure 2-14
Trends in Total Housing Units, 1990-2009

Census Tract	1990		2000		2009		Change 1990-2009	
	#	%	#	%	#	%	#	%
Regional Total	**145,384**	**100.0%**	**157,079**	**100.0%**	**163,934**	**100.0%**	**18,550**	**12.8%**
Urban County*	86,454	59.5%	98,367	62.6%	101,667	62.0%	15,213	17.6%
Alliance City	9,589	6.6%	9,696	6.2%	9,863	6.0%	274	2.9%
Canton City	36,527	25.1%	35,477	22.6%	37,779	23.0%	1,252	3.4%
Massillon City	12,814	8.8%	13,539	8.6%	14,625	8.9%	1,811	14.1%

**Urban County is Stark County exclusive of the Cities of Alliance, Canton, and Massillon*
Source: U.S. Census Bureau

ii. Types of Housing Units

Single-family homes comprised 76.6% of the housing stock in the region and multi-family units comprised 20.9%. Mobile homes accounted for 2.4%. Although the majority of multi-family units were in the Urban County, the Cities of Alliance and Canton had the highest proportion of multi-family units as part of their respective housing stocks.

Figure 2-15
Trends in Housing Units in Structures, 2000

	Total Units	Single-family units (detached and	Multi-family units					Mobile home
			2 to 4	5 to 9	10 to 19	20 or more	Total	
Regional Total	**157,044**	**147,209**	**20,110**	**6,758**	**4,905**	**4,686**	**36,459**	**6,110**
Urban County*	98,367	105,360	11,155	4,242	2,662	2,062	20,121	5,620
Alliance City	9,661	6,750	1,622	403	432	418	2,875	36
Canton City	35,477	24,818	5,652	1,660	1,472	1,796	10,580	79
Massillon City Total	13,539	10,281	1,681	453	339	410	2,883	375

**Urban County is Stark County exclusive of the Cities of Alliance, Canton, and Massillon*
Source: U.S. Census Bureau, Census 2000 (SF 3, H30)

iii. Foreclosure Trends

The foreclosure crisis hit Ohio earlier and harder than most other parts of the country. The number of foreclosure filings increased every year between 1995 and 2009, and the number of new filings more than quadrupled during this period.[4] According to the 2009 year-end report from RealtyTrac, an aggregator of nationwide residential foreclosure, loan, and property sales data, the State of Ohio had the 12th highest foreclosure rate in the country, with 101,614 foreclosure filings, or one for every 50 housing units.[5] Filings include default notices, auction sale notices, and bank repossessions.

Between 2000 and 2008, the number of foreclosure filings in Stark County more than doubled from 1,247 to 3,017. However, between 2008 and 2009, the County experienced a decrease in foreclosure filings of 10.5%. Among the ten largest counties in Ohio, Stark experienced the largest decrease in filings between 2008

[4] Rothstein, David (March 2010). "Home Insecurity: Foreclosure Growth in Ohio 2010." Policy Matters Ohio.
[5] RealtyTrac (Jan. 14, 2010). "RealtyTrac® Year-End Report Shows Record 2.8 Million U.S. Properties With Foreclosure Filings In 2009." Accessed online <*http://www.realtytrac.com/content/foreclosure-market-report/realtytrac-year-end-report-shows-record-28-million-us-properties-with-foreclosure-filings-in-2009-5489*>

and 2009. The County had the lowest number of filings, at 7.12 foreclosures per every 1,000 persons.[6]

HUD NSP Estimates provides foreclosure data at the local level for the period of January 2007 to June 2008.[7] Throughout the region, there were an estimated 5,495 foreclosures during this period. About half of these were in the Urban County, although the Urban County also had the lowest foreclosure rate of 6.3%. In Canton, the foreclosure rate was the highest, at 12.3%.

Figure 2-16
Estimated Residential Foreclosure Rates, January 2007 – June 2008

	Foreclosure Filings	Total Mortgages	Foreclosure Rate
Regional Total	**5,495**	**67,929**	**8.1%**
Urban County*	2,723	43,393	6.3%
Alliance City	388	3,737	10.4%
Canton City	1,720	13,936	12.3%
Massillon City	664	6,863	9.7%

**Urban County is Stark County exclusive of the Cities of Alliance, Canton, and Massillon*
Source: HUD NSP Foreclosure Estimates, 2008

Foreclosure activity is related to fair housing to the extent that it is disproportionately dispersed, both geographically and among members of the protected classes. Concentrated foreclosures and residential vacancy threaten the viability of neighborhoods as well as the ability of families to maintain housing and build wealth. Households carrying heavy cost burdens are prime candidates for mortgage delinquency and foreclosure.

Observation

Between January 2007 and June 2008, the region had a foreclosure rate of 8.1%.

The City of Canton had the region's highest foreclosure rate of 12.3%, while the Urban County had the lowest rate of 6.3%.

iv. Protected Class Status and Home Ownership

The value in home ownership lies in the accumulation of wealth as the owner's share of equity increases with the property's value. Paying a monthly mortgage instead of rent is an investment in an asset that is likely to appreciate. According to

6 Rothstein, David (March 2010). "Home Insecurity: Foreclosure Growth in Ohio 2010." Policy Matters Ohio.
7 HUD NSP Estimates data, covering the period between January 2007 and June 2008, is not an exact count, but distributes the results of a national survey across geographic areas according to a model considering rates of metropolitan area home value decline, unemployment and high-cost mortgages.

one study, “a family that puts 5 percent down to buy a house will earn a 100 percent return on the investment every time the house appreciates 5 percent.”[8]

Whites were more likely than minorities to own a house in 2000. Across the region, three-quarters of Whites were home owners, compared to less than half of Black households, 55.1% of Hispanics and 63.3% of Asians. Home ownership was highest for all subpopulations in the Urban County, as detailed in Figure 2-17.

Figure 2-17
Home Ownership by Race and Ethnicity, 2000

	White		Black		Asian		Hispanic	
	#	%	#	%	#	%	#	%
Regional Total	**101,274**	**74.6%**	**4,736**	**47.8%**	**392**	**63.3%**	**554**	**55.1%**
Urban County*	72,173	79.1%	1,040	58.0%	301	64.3%	335	62.4%
Alliance City	4,823	61.7%	436	51.7%	0	0.0%	36	48.6%
Canton City	8,452	65.5%	2,761	43.9%	67	69.1%	161	52.1%
Massillon City	8,100	70.4%	499	51.2%	24	60.0%	22	25.9%

**Urban County is Stark County exclusive of the Cities of Alliance, Canton, and Massillon*

Source: U.S. Census Bureau, Census 2000 (SF 3, H11, H12)

As discussed previously in this report, median household income is lower among minority households than among White households. This factor contributes to the low rates of home ownership among minorities in the region.

Observation

Higher unemployment and lower household incomes among minorities are reflected in lower home ownership rates when compared to Whites.

Three-quarters of White households were home owners in 2000, compared to 47.8% of Blacks, 55.1% of Hispanics and 63.3% of Asians.

v. The Tendency of the Protected Classes to Live in Larger Households

Larger families may be at risk for housing discrimination on the basis of race and the presence of children (familial status). A larger household, whether or not children are present, can raise fair housing concerns. If there are policies or programs that restrict the number of persons that can live together in a single housing unit, and members of the protected classes need more bedrooms to accommodate their larger household, there is a fair housing concern because the restriction on the size of the unit will have a negative impact on members of the protected classes.

In Stark County, almost two-thirds of Black families had three or more persons, compared to 54.8% of White and Asian families. Multi-race families, families of Some Other Race, and Hispanic families also had higher rates of larger families.

[8] Kathleen C. Engel and Patricia A. McCoy, “From Credit Denial to Predatory Lending: The Challenge of Sustaining Minority Homeownership,” in *Segregation: The Rising Costs for America,* edited by James H. Carr and Nandinee K. Kutty (New York: Routledge 2008) p. 82.

Figure 2-18
Families with Three or More Persons in Stark County, 2000

Race	Percent of Families with 3 or more persons
White	54.8%
Black	65.7%
Asian	54.8%
Some Other Race Alone	65.7%
Two or More Races	64.7%
Hispanic	65.1%

Source: U.S. Census Bureau, Census 2000 (SF 4, PCT17)

To adequately house larger families, a sufficient supply of larger dwelling units consisting of three or more bedrooms is necessary. Throughout Stark County, one-quarter of the rental housing stock contained three or more bedrooms in 2000 compared to 80.5% of the owner-occupied housing stock.

Figure 2-19
Housing Units by Number of Bedrooms in Stark County, 2000

Size of Housing Units	Renter-Occupied Housing Stock		Owner-Occupied Housing Stock	
	Number of Units	Percent of Total Housing Units	Number of Units	Percent of Total Housing Units
0-1 bedroom	11,234	27.5%	1,551	1.4%
2 bedrooms	19,103	46.7%	19,437	18.1%
3 or more bedrooms	**10,582**	**25.9%**	**86,419**	**80.5%**
Total	**40,919**	**100.0%**	**107,407**	**100.0%**

Source: U.S. Census Bureau, Census 2000 (SF 3, H42)

Observation

Minority households were much more likely to live in larger families than White households.

Almost two-thirds of Black, Hispanic and multi-race families had three or more persons, compared to 54.8% of White families. However, only 25.9% of the rental housing stock contains three or more bedrooms, compared to 80.5% of owner stock.

vi. Cost of Housing

Increasing housing costs are not a direct form of housing discrimination. However, a lack of affordable housing does constrain housing choice. Residents may be limited to a smaller selection of neighborhoods because of a lack of affordable housing in other areas.

In Stark County, the median housing value increased 30.3% between 1990 and 2008, after adjusting for inflation. All of this growth was during the 1990s; real median housing values remained stagnant between 2000 and 2008. Median gross rent during the period decreased slightly. Median household income, on the other hand, decreased 6.3%, or more than $3,000, between 1990 and 2008, after adjusting for inflation.

Figure 2-20
Trends in Housing Value, Rent and Income in Stark County, 1990-2008

	1990	2000	2008	Change 1990-2008
Median Housing Value				
Actual Dollars	$57,400	$100,300	$129,900	126.3%
2008 Dollars	$99,664	$129,621	$129,900	30.3%
Median Gross Rent				
Actual Dollars	$356	$486	$610	71.3%
2008 Dollars	$618	$628	$610	-1.3%
Median Household Income				
Actual Dollars	$27,852	$39,824	$45,306	62.7%
2008 Dollars	$48,360	$51,466	$45,306	-6.3%

Sources: U.S. Census Bureau, 1990 Census (STF3-H061A, H043A, P080A), Census 2000 (SF3-H76, H63, P53), 2006-2008 American Community Survey (B25077, B25064, B19013); Calculations by Mullin & Lonergan Associates, Inc.

a. Rental Housing

At the same time median household income failed to keep pace with housing costs, the region also lost a large number of affordable rental units. Between 2000 and 2008, the number of affordable rental units renting for less than $500 a month decreased by almost 7,500 units, or 36.4%. By comparison, units renting for more than $1,000 increased 308.1%, or 2,656 units.

Figure 2-21
Loss of Affordable Rental Housing Units, 2000-2008

Units Renting for:	2000	2008	Change 2000-2008 #	Change 2000-2008 %
Less than $500	20,558	13,074	-7,484	-36.4%
$500 to $699	12,954	13,793	839	6.5%
$700 to $999	3,996	11,455	7,459	186.7%
$1,000 or more	862	3,518	2,656	308.1%

Sources: U.S. Census Bureau, Census 2000 (SF3, H62), 2006-2008 American Community Survey (B25063)

Observation

The region lost more than 7,500 units renting for less than $500 between 2000 and 2008.

By comparison, units renting for more than $1,000 increased 308.1%.

The National Low Income Housing Coalition provides annual information on the Fair Market Rent (FMR) and affordability of rental housing in counties and cities in the U.S. for 2010. In Stark County, the FMR for a two-bedroom apartment is $644. In order to afford this level of rent and utilities, without paying more than 30% of income on housing, a household must earn $2,147 monthly or $25,760 annually. Assuming a 40-hour work week, 52 weeks per year, this level of income translates into a Housing Wage of $12.38.

In Stark County, a minimum wage worker earns an hourly wage of $7.30. In order to afford the FMR for a two-bedroom apartment, a minimum wage earner must work 68 hours per week, 52 weeks per year. Or, a household must include 1.7 minimum wage earners working 40 hours per week year-round in order to make the two-bedroom FMR affordable.

Observation

Minimum-wage and single-income households cannot afford a housing unit renting for the HUD fair market rent in Stark County.

This situation forces these individuals and households to double-up with others, or lease inexpensive, substandard units. Minorities and female-headed households will be disproportionately impacted because of their lower incomes.

In Stark County, the estimated average wage for a renter is $10.46 an hour. In order to afford the FMR for a two-bedroom apartment at this wage, a renter must work 47 hours per week, 52 weeks per year. Or, working 40 hours per week year-round, a household must include 1.2 workers earning the average renter wage in order to make the two-bedroom FMR affordable.

Monthly Supplemental Security Income (SSI) payments for an individual are $674 in Stark County and across Ohio. If SSI represents an individual's sole source of income, $202 in monthly rent is affordable, while the FMR for a one-bedroom is $510.

Observation

Persons receiving a monthly SSI check of $674 as their sole source of income, including persons with disabilities, cannot afford a one-bedroom unit renting at the fair market rate of $510.

b. Sales Housing

The Stark County Association of Realtors compiles and distributes sales trend data for all of Stark County for the years 2002 to 2009. Following national trends, the County’s sales market peaked in 2005 at 4,653 units sold before falling to 3,518 units in 2009. During this period, the average sales price also fell by an inflation-adjusted 38.9% to $100,901.

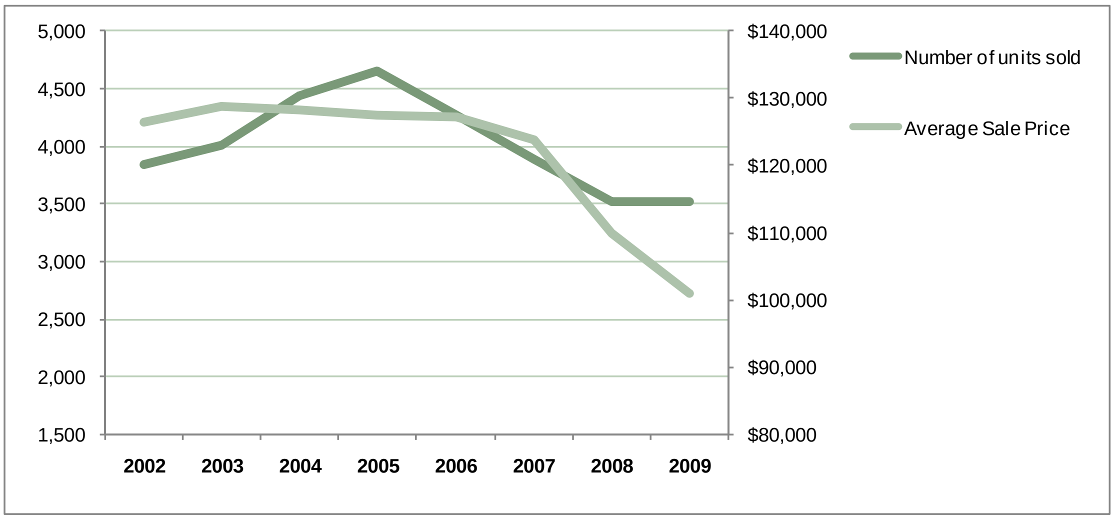
Figures 2-22 and 2-23 detail the sales market trends from 2002 to 2009.

Figure 2-22
Housing Market Sales Trends, 2002-2009

	2002	2003	2004	2005	2006	2007	2008	2009
Single-Family Properties								
Number of units sold	3,843	4,013	4,440	4,653	4,271	3,891	3,516	3,518
Average No. Days on Market	78	79	74	75	85	92	102	93
Average List Price	---	---	---	---	---	$136,682	$127,610	$120,529
Average Sale Price	$126,411	$128,744	$128,288	$127,540	$127,263	$123,693	$109,838	$100,901
ASP as % ALP*	---	---	---	---	---	90%	86%	84%

*Average Sales Price as a percent of Average List Price. Average List Price not available for 2002 to 2006
Source: Stark County Association of Realtors

Figure 2-23
Number of Housing Units Sold and Average Sales Price, 2002-2009



Affordability varied considerably across the region. Figure 2-24 details the estimated *maximum* affordable sales prices and monthly PITI payments for the different jurisdictions covered in this AI, given the local median household incomes and property tax rates. The County as a whole had the highest maximum affordable purchase price of $171,600, which was 70% greater than the County's average sales price. Canton had the lowest maximum affordable purchase price of $104,000, which was still slightly higher than the average sales price. Overall, this suggests that the region is relatively affordable to most households. However, as will be detailed more within the individual sections, sales affordability varies significantly among racial and ethnic groups in each jurisdiction.

Figure 2-24
Maximum Affordable Purchase Price by Race/Ethnicity, 2009

	Median Household Income	Monthly Mortgage Payment: Mortgage Principal & Interest	Monthly Mortgage Payment: Real Estate Taxes	Monthly Mortgage Payment: Homeowner's Insurance & PMI	Monthly Mortgage Payment: Total PITI Payment	Maximum Affordable Purchase Price
Stark County	**$45,306**	**$829**	**$224**	**$80**	**$1,133**	**$171,600**
Alliance City	$32,447	$586	$146	$80	$811	$121,200
Canton City	$28,679	$502	$135	$80	$717	$104,000
Massillon City	$40,193	$717	$208	$80	$1,005	$148,400
2009 Average Sales Price: $100,901						

Sources: 2006-2008 American Community Survey (B19013, B19013A, B19013B); Stark County Association of Realtors; Stark County Auditor's Office; Calculations by Mullin & Lonergan Associates, Inc.

vii. Protected Class Status and Housing Problems

Lower-income minority households tend to experience housing problems at a higher rate than lower-income white households.[9] An analysis of lower-income households in Stark County shows a more complex picture. Among renter households, Blacks and Hispanics were less likely than Whites to have housing problems. Over half of White households with incomes less than 80% of median family income had a housing problem, compared to 46.9% of Blacks and only 25.8% of Hispanics. Among elderly households, however, Hispanics were most likely to have a housing problem, and among family households, Blacks had a higher rate of housing problems.

Among home owners, however, Blacks experienced housing problems at the highest rates. White and Hispanics problems had similar rates of housing problems, at 38.2% and 38.6%, respectively, compared to 48.1% of Blacks.

Figure 2-25
Lower-income Households with Housing Problems in Stark County, 2000

	Total Households 0-80% of MFI		Elderly & 1-2 Person Households 0-80% of MFI		Family Households 0-80% of MFI		All Other Households 0-80% of MFI	
	Total	% with a Housing Problem	Total	%	Total	%	Total	%
Renters								
White Non-Hispanic	20,480	50.7%	5,675	55.1%	7,930	48.1%	6,875	50.2%
Black Non-Hispanic	3,935	46.9%	500	45.0%	2,240	49.8%	1,195	42.3%
Hispanic	273	25.8%	48	70.8%	130	38.4%	95	36.8%
Total	**25,501**	**49.8%**	**6,317**	**54.4%**	**10,686**	**48.0%**	**8,498**	**48.6%**
Owners								
White Non-Hispanic	29,175	38.2%	15,230	26.8%	9,955	49.2%	3,990	54.1%
Black Non-Hispanic	2,089	48.1%	835	40.1%	930	49.5%	324	64.8%
Hispanic	241	38.6%	93	25.8%	119	37.0%	29	86.2%
Total	**31,965**	**39.2%**	**16,282**	**27.8%**	**11,227**	**49.4%**	**4,456**	**54.9%**

Source: HUD Comprehensive Housing Affordability Strategy data

[9] HUD defines housing problems as (1) cost burden of 30% or more (i.e. paying more than 30% of gross income on monthly housing expenses), and/or (2) lacking complete kitchen or plumbing facilities, and/or (3) overcrowding of more than 1.01 persons per room.

Observation

Lower-income Black home owners experienced housing problems at greater rates than White and Hispanic households.

Among owner households, 48.1% of Blacks had housing problems compared to 38.2% of Whites and 38.6% of Hispanics.

3. City of Alliance

A. Demographic Profile

i. Population Trends

The total population in Alliance decreased 3.8% between 1990 and 2010. All of this loss was among the City's White residents, whose population decreased 6.1%. The number of non-White residents, on the other hand, increased 11.7%. Non-Whites comprised 15.1% of the City's population in 2010 compared to 13% in 1990.

Figure 3-1
Population Trends, 1990 to 2010

	1990		2000		2010		% Change
	#	%	#	%	#	%	1990-2010
Alliance	**23,393**	**100.0%**	**23,229**	**100.0%**	**22,507**	**100.0%**	**-3.8%**
White Population	20,353	87.0%	20,099	86.5%	19,112	84.9%	-6.1%
Non-White Population	3,040	13.0%	3,130	13.5%	3,395	15.1%	11.7%
Black	2,829	12.1%	2,287	9.8%	2,544	11.3%	-10.1%
Amer. Indian/Alaska Native	37	0.2%	43	0.2%	37	0.2%	0.0%
Asian / Pacific Islander	123	0.5%	89	0.4%	288	1.3%	134.1%
Some Other Race	51	0.2%	94	0.4%	93	0.4%	82.4%
Two or More Races	---	---	617	2.7%	433	1.9%	-29.8%
Hispanic	99	0.4%	229	1.0%	303	1.3%	206.1%

Source: U.S. Census Bureau, DemographicsNow

The non-White population in Alliance has become increasingly diverse. In 1990, Blacks comprised 93.1% of the non-White population in Alliance. Over the next 20 years, the Black population decreased 10.1%, and by 2010, Blacks accounted for 75% of all non-White residents. The Asian/Pacific Island population more than doubled during this period, though it comprised only 8.5% of the non-White population in 2010. Multi-race persons were the second largest minority group and comprised 12.8% of the non-White population 2010.

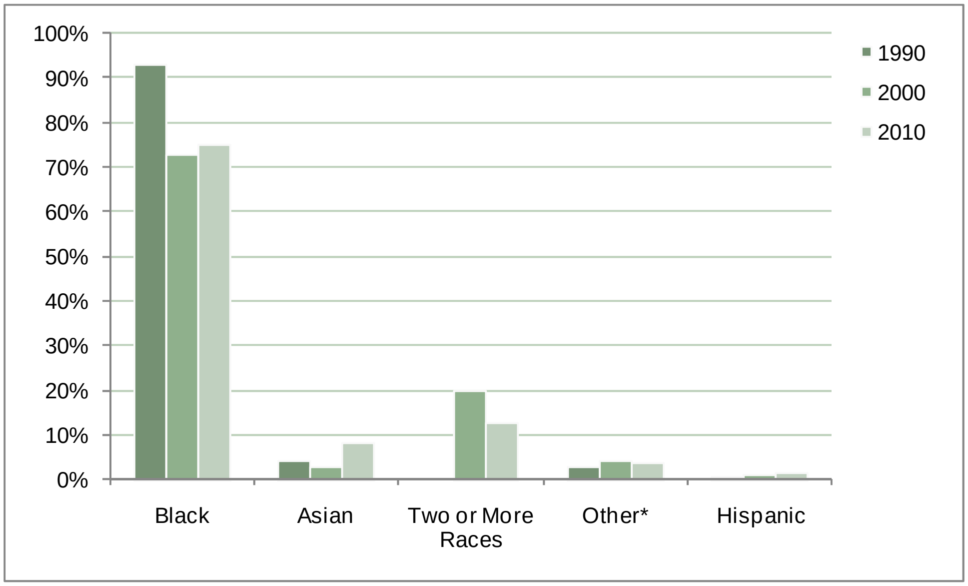
The fastest growth has been among Hispanic residents. The Hispanic population tripled between 1990 and 2010 – from 99 to 303 persons – and in 2010 accounted for 1.3% of the City's total population.

Observation

Minorities increased from 13.0% to 15.1% of the total population between 1990 and 2010.

Blacks remain the largest minority group. However, the fastest growing segments of the population have been Asian/Pacific Islanders and Hispanics, which grew by 134.1% and 205.1%, respectively.

Figure 3-2
Changes in the Racial and Ethnic Characteristics of the Minority Population, 1990-2010



**Other includes Alaska Natives/American Indians and Persons of Some Other Race*

ii. Areas of Racial and Ethnic Minority Concentration

The City's Five-Year Consolidated Plan does not set a specific threshold to define areas of racial or ethnic minority concentration, though it identifies four priority neighborhoods for the investment of entitlement funds based on relatively higher proportions of poverty and minority residents. These areas are illustrated and discussed further in the public policies review section of the AI.

In the absence of specific definitions for "area of racial or ethnic concentration" in consolidated planning documents for each of the Stark County Consortium jurisdictions, a generally accepted definition is applied throughout the AI: Concentrated geographical areas are those within a city where the percentage of a specific minority or ethnic group is 10 percentage points higher than in the city overall. In Alliance, Blacks comprised 7.6% of the population in 2009.[10] Therefore, an area of racial concentration would include any census tract where the percentage of Black residents is 17.6% or higher. By this definition, there are no areas of minority concentration in Alliance. To more accurately reflect the growing diversity among Alliance's population, the City should amend its Five-Year Consolidated Plan to incorporate this definition of an area of racial or ethnic concentration.

Figure 3-4 depicts the distribution of Black residents in Alliance.

[10] American Community Survey 2005-2009 estimates were used to update Census 2000 data. The City is advised to use Census 2010, when available, to recalculate areas of minority concentration.

Observation

No census tracts in the City of Alliance qualify as areas of racial or minority concentration, though tracts 7102, 7104 and 7105 have proportions of Black residents significantly higher than the rest of the City. These tracts coincide with the City's targeted investment areas.

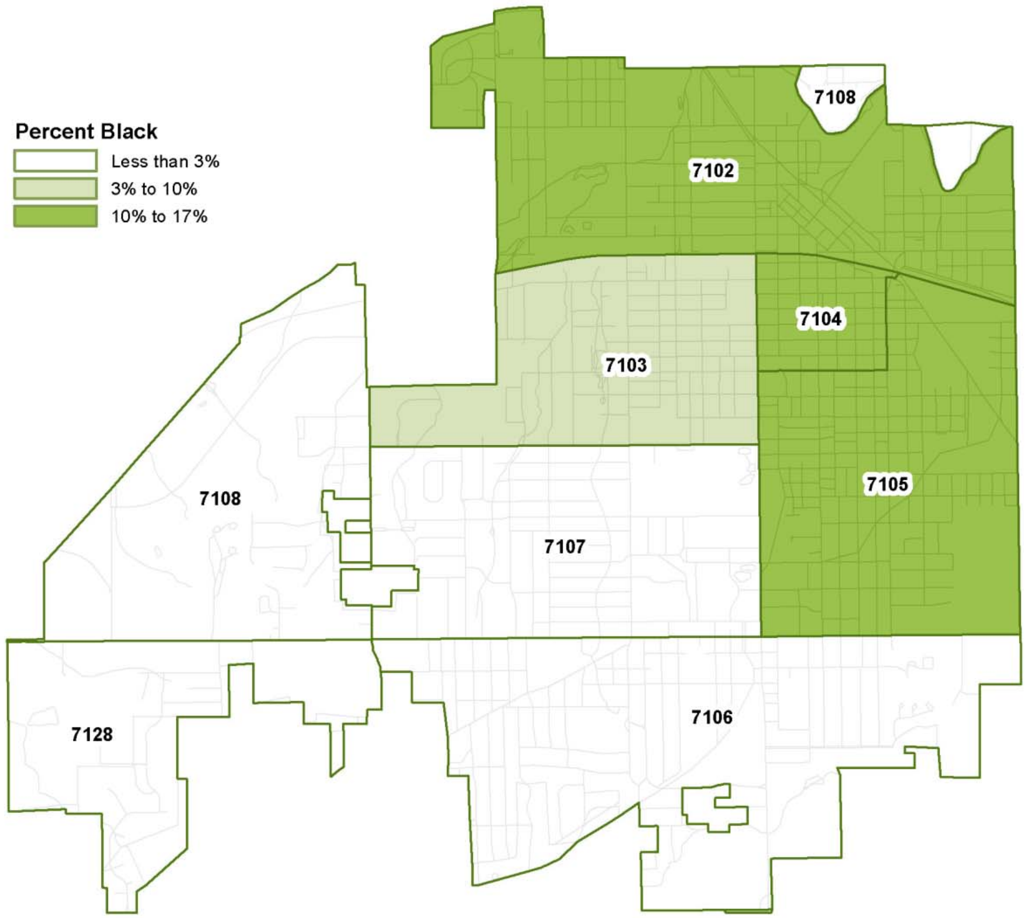
Figure 3-3
Census Tract Population by Race and Hispanic Origin, 2009

Census Tract	Total Population	White	Minority Residents		
			Black	Asian	Hispanic
Alliance	**22,522**	**87.2%**	**7.6%**	**1.5%**	**1.3%**
7102*	3,464	77.0%	16.2%	0.0%	3.5%
7103*	3,470	93.0%	5.2%	0.0%	0.7%
7104	1,102	70.2%	16.1%	0.0%	1.5%
7105	4,226	72.7%	14.4%	0.0%	0.5%
7106*	4,547	95.9%	2.0%	3.9%	0.0%
7107*	3,841	93.8%	2.3%	3.7%	1.9%
7108*	1,414	91.2%	0.8%	1.0%	1.9%
7128*	458	95.6%	0.0%	0.0%	1.5%
8130*	0	---	---	---	---

**Data in starred census tracts reflects only the parts of the tracts within the City of Alliance*

Source: U.S. Census Bureau, ACS 2005-09 Estimates

Figure 3-4
Map: Census Tract Population by Race, 2009



iii. Residential Segregation Patterns

Residential segregation is a measure of the degree of separation of racial or ethnic groups living in a neighborhood or community. Typically, the pattern of residential segregation involves the existence of predominantly homogenous, White suburban communities and low-income minority inner-city neighborhoods. A potential impediment to fair housing is created where either latent factors, such as attitudes, or overt factors, such as real estate practices, limit the range of housing opportunities for minorities. A lack of racial or ethnic integration in a community creates other problems, such as reinforcing prejudicial attitudes and behaviors, narrowing opportunities for interaction, and reducing the degree to which community life is considered harmonious. Areas of extreme minority isolation often experience poverty and social problems at rates that are disproportionately high. Racial segregation has been linked to diminished employment prospects, poor educational attainment, increased infant and adult mortality rates and increased homicide rates.

The distribution of racial or ethnic groups across a geographic area can be analyzed using an index of dissimilarity. This method allows for comparisons between subpopulations, indicating how much one group is spatially separated from another within a community. The index of dissimilarity is rated on a scale from 0 to 100, in which a score of 0 corresponds to perfect integration and a score of 100 represents total segregation.[11] The index is typically interpreted as the percentage of the minority population (in this instance, the Black population) that would have to move in order for a community or neighborhood to achieve full integration. A dissimilarity index of less than 30 indicates a low degree of segregation, while values between 30 and 60 indicate moderate segregation, and values above 60 indicate high segregation.

Figure 3-5 details the dissimilarity indices for metropolitan areas throughout Ohio. With a dissimilarity index of 48.0, Alliance ranks 25th out of 56 municipalities. The data indicates that in order to achieve full integration among White and Black residents, 48% of Blacks would have to move to another area within the City.

[11] The index of dissimilarity is a commonly used demographic tool for measuring inequality. For a given geographic area, the index is equal to **1/2 Σ ABS [(b/B)-(a/A)]**, where b is the subgroup population of a census tract, B is the total subgroup population in a city, a is the majority population of a census tract, and A is the total majority population in the city. ABS refers to the absolute value of the calculation that follows.

Figure 3-5
Ohio Municipal Dissimilarity Index Rankings, 2000

Rank	City	Black Population	White Population	Total Population	Dissimilarity Index
1	Garfield Heights	5,143	24,577	30,734	80.7
2	Cleveland	241,512	185,641	478,403	79.4
3	Dayton	71,291	87,487	166,179	78.3
4	Hamilton	4,562	53,386	60,690	68.7
5	Toledo	73,134	212,658	313,619	67.0
6	Barberton	1,482	25,662	27,899	65.9
7	Youngstown	35,440	40,100	82,026	64.2
8	Cincinnati	141,534	173,781	331,285	63.0
9	Akron	61,510	144,719	217,074	61.5
10	Columbus	172,750	475,897	711,470	61.0
11	Springfield	11832	50,663	65,358	60.6
12	Middletown	5,447	44,658	51,605	59.6
13	Massillon	2,934	27,422	31,325	56.6
14	Euclid	16,038	34,678	52,717	56.2
15	East Cleveland	25,291	1,219	27,217	55.6
20	Medina	687	23,607	25,139	51.0
21	Cleveland Heights	20,752	25,840	49,958	50.3
22	Canton	16,875	59,653	80,806	50.0
23	Cuyahoga Falls	918	47,102	49,374	48.6
24	Marion	2,465	31,658	35,318	48.4
25	**Alliance**	**2,287**	**20,099**	**23,458**	**48.0**
52	Strongsville	533	40,929	43,858	23.8
53	Beavercreek	537	35,190	37,984	21.1
54	Gahanna	2,636	27,966	32,636	19.5
55	Dublin	527	27,901	31,392	18.8
56	Huber Heights	3,703	32,075	38,212	18.6

Source: Census Scope; U.S. Census Bureau, 2000 Census; Calculations by Mullin & Lonergan Associates, Inc.

Observation

Alliance is a moderately segregated city.

According to dissimilarity index data, 48% of Black persons would have to move to a different location in Alliance in order to achieve full integration.

Dissimilarity index data for all Alliance subpopulations appears in the following table. Perfect integration would receive an index score of 0. However, indices for subpopulations other than Blacks in the City cannot be as reliably interpreted, since their populations are less than 1,000. In cases where subgroup population is small, the dissimilarity index may be high even if the group's members are evenly dispersed.

Figure 3-6
Alliance Dissimilarity Indices, 2000

	DI with White Population**	Population	% of Total Population
White	-	20,099	85.7%
Black	**48.0**	**2,287**	**9.7%**
American Indian/Alaska Native*	46.8	43	0.2%
Asian*	45.8	89	0.4%
Other*	49.0	94	0.4%
Two or more races*	25.8	617	2.6%
Hispanic***	38.8	229	1.0%
TOTAL	-	23,458	100.0%

** In these cases, sample size is too small to reliably interpret the DI. Caution should be exercised in interpreting results for subpopulations of fewer than 1,000.*
*** Each dissimilarity index indicates the percentage of one of the two population groups compared that would have to move to different geographic locations (i.e., block groups) to create a completely even demographic distribution in the City.*
**** Hispanic ethnicity is counted independently of race*
Source: U.S. Census Bureau, 2000 Census; Calculations by Mullin&Lonergan Associates, Inc.

iv. Race/Ethnicity and Income

Household income is one of several factors used to determine a household's eligibility for a home mortgage loan or a rental lease. In Alliance, Blacks had a median household income of $20,327, which was $2,000 less than Whites. Hispanics and Asians both had median household incomes greater than Blacks, at $32,636 and $42,901, respectively. However, due to the small sample sizes and large margins of error for these populations, these estimates should be reviewed with caution.

Minority residents also experienced poverty at higher rates than Whites. Blacks and Asians were twice as likely as Whites to be living in poverty in 2000. Among Hispanics, 21.6% lived in poverty compared to 15.1% of Whites.

Figure 3-7
Median Household Income and Poverty Rates by Race/Ethnicity, 2000-2008

	Median Household Income, 2008	Poverty Rate 2000	Poverty Rate 2008
Alliance	**$32,447**	**18.0%**	**15.0%**
Whites	$32,652	15.1%	12.4%
Blacks	$30,327	32.5%	27.4%
Asians*	$42,901	39.2%	--
Hispanics*	$32,636	21.6%	--

** Due to small sample sizes, the margins of error for the median household income estimates of Asians and Hispanics are relatively large. Therefore, estimates should be evaluated with caution.*

Source: U.S. Census Bureau, Census 2000 (SF3-P53, P159) 2006-2008 American Community Survey (B19013, B19013A, B19013B, B19013D, B19013I & B17001, B17001A, B17001B, B17001D, B17001F, B17001I)

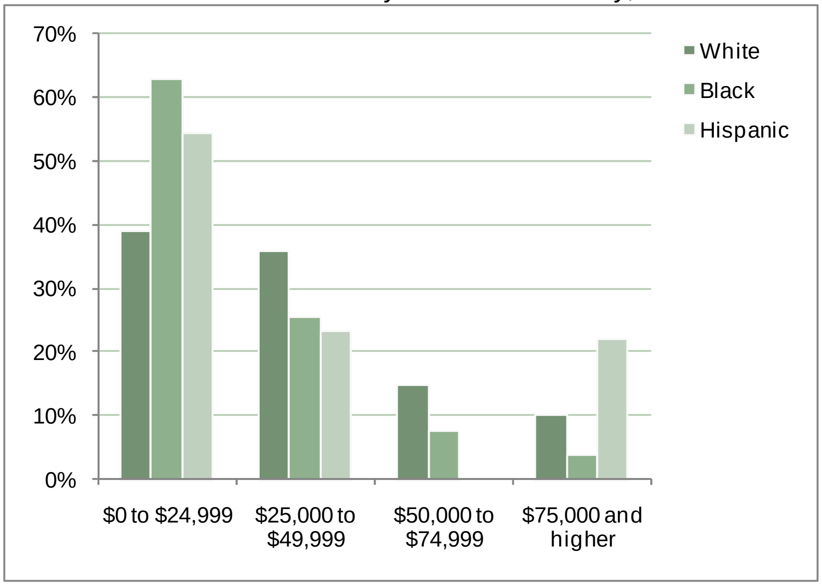
A review of household income distribution also shows a disparity among households. In 2000, nearly two-thirds of Black Households and 54.5% of Hispanic households earned less than $25,000 annually. By comparison, only 38.9% of White households fell into this income category. At the other end of the spectrum, White households were almost three times as likely as Black households to earn more than $75,000 annually. Hispanics had a greater proportion of households at this higher income bracket than Whites; however, only 17 households were included in this category.

Figure 3-8
Household Income Distribution by Race and Ethnicity, 2000

	Total	$0 to $24,999		$25,000 to $49,999		$50,000 to $74,999		$75,000 and higher	
		#	%	#	%	#	%	#	%
All Households	**8,932**	**3,713**	**41.6%**	**3,109**	**34.8%**	**1,258**	**14.1%**	**852**	**9.5%**
White Households	7,825	3,047	38.9%	2,815	36.0%	1,167	14.9%	796	10.2%
Black Households	915	577	63.1%	233	25.5%	69	7.5%	36	3.9%
Hispanic Households	77	42	54.5%	18	23.4%	-	0.0%	17	22.1%

Source: U.S. Census Bureau, Census 2000, SF3 (P52, P151A, P151B, P151D, P151H)

Figure 3-9
Household Income Distribution by Race and Ethnicity, 2000



Observation

Blacks experienced poverty at twice the rate of Whites in Alliance in 2008.

Median household income for Blacks was lower than Whites in 2008. Blacks also had a poverty rate of 27.4% compared to 12.4% for Whites. Consequently, Black households may have a more difficult time finding and sustaining affordable housing.

v. Concentrations of LMI Persons

The CDBG program includes a statutory requirement that at least 70% of funds invested benefit low and moderate income (LMI) persons. As a result, HUD provides the percentage of LMI persons in each census block group for entitlements such as Alliance. HUD data reveals that there are 12 census block groups in Alliance where at least 51% of residents (for whom this rate is determined) meet the criterion for low and moderate income status. These are highlighted in Figure 3-10.

Figure 3-11 illustrates the location of LMI concentrations in Alliance.

Figure 3-10
Low and Moderate Income Persons, 2010

Census Tract	Block Group	Low/Moderate Income Persons		
		#	Universe	%
7102	1	502	785	63.95%
7102	2	243	272	89.34%
7102	3	641	1,011	63.40%
7102	4	444	604	73.51%
7102	5	1,105	1,398	79.04%
7103	1	266	532	50.00%
7103	2	1,018	2,437	41.77%
7103	3	237	537	44.13%
7104	1	899	1,072	83.86%
7105	1	388	699	55.51%
7105	2	509	865	58.84%
7105	3	1,087	1,536	70.77%
7105	4	1,018	1,747	58.27%
7106	3	581	1,590	36.54%
7106	4	482	1,534	31.42%
7106	5	349	940	37.13%
7107	2	464	1,010	45.94%
7107	3	371	1,179	31.47%
7107	4	97	459	21.13%
7108	1	0	39	0.00%
7108	1	53	110	48.18%
7108	5	393	707	55.59%
7128	1	0	0	0.00%
7128	2	0	0	0.00%
7128	1	0	0	0.00%
7128	2	154	286	53.85%

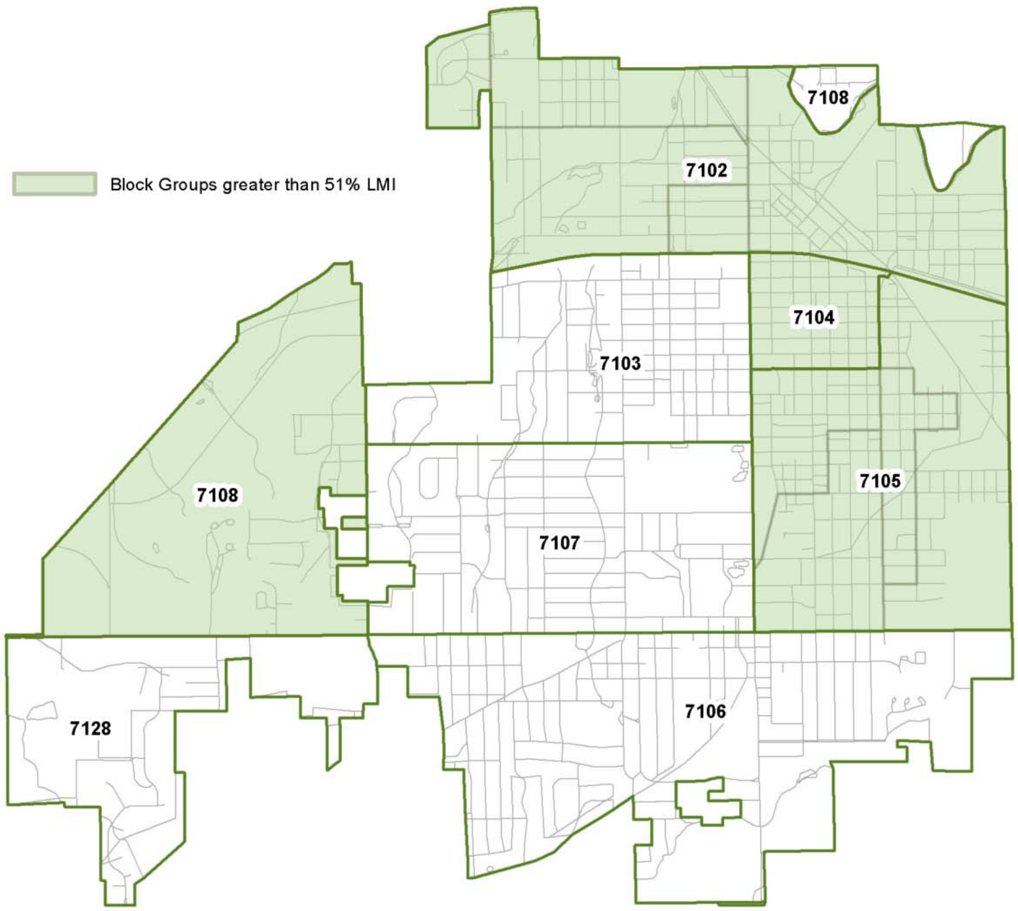
Source: HUD LMI Estimates, 2009

Note: Highlighted rows indicate census block groups where the percentage of LMI persons is 51.0% or greater.

Observation

Of the 26 census block groups within the City of Alliance, 12 qualify as areas of concentration of low and moderate income persons.

Figure 3-11
Map: Distribution of Low and Moderate Income Persons, 2010



vi. Disability and Income

As defined by the Census Bureau, a disability is a long-lasting physical, mental, or emotional condition that can make it difficult for a person to do activities such as walking, climbing stairs, dressing, bathing, learning, or remembering. This condition can also impede a person from being able to go outside the home alone or to work at a job or business.

The Fair Housing Act prohibits discrimination based on physical, mental or emotional handicap, provided "reasonable accommodation" can be made. Reasonable accommodation may include changes to address the needs of disabled persons, including adaptive structural (e.g., constructing an entrance ramp) or administrative changes (e.g., permitting the use of a service animal). In Alliance, 22.0% of the population 5 years and older reported at least one type of disability in 2000.[12]

According to the National Organization on Disabilities, a significant income gap exists for persons with disabilities, given their lower rate of employment. In Alliance, persons with disabilities are more likely than persons without disabilities to live in poverty. In 2000, 19.3% of persons with disabilities lived in poverty compared to 16.2% of persons without disabilities.[13]

Observation

Persons with disabilities were more likely to live in poverty than persons without disabilities.

Among all persons with a disability in 2000, 19.3% lived in poverty compared to 16.2% of persons without disabilities.

vii. Familial Status and Income

The Census Bureau divides households into family and non-family households. Family households are married couple families with or without children, single-parent families and other families made up of related persons. Non-family households are either single persons living alone, or two or more non-related persons living together.

Women have protection under Title VIII of the Civil Rights act of 1968 against discrimination in housing. Protection for families with children was added in the 1988 amendments to Title VIII. Except in limited circumstances involving elderly housing and owner-occupied buildings of one to four units, it is unlawful to refuse to rent or sell to families with children.

The total number of households in Alliance remained relatively stable between 1990 and 2008. During the same period, the number of married-couple households decreased nearly 30% and shrank from 23.5% of all households to 16.6%. The number of married-couple households with children, however, remained the same, comprising 27.5% of all households in both 1990 and 2008.

The proportion of female-headed households increased from 13% to 15.8%, but the proportion of female-headed households with children decreased slightly from 8.5% to 7.8%. Single males raising children, on the other hand, more than doubled from 1.7% of households in 1990 to 3.6% in 2008.

[12] U.S. Census Bureau, Census 2000, SF3 (P42)
[13] U.S. Census Bureau, Census 2000 (SF3, PCT34)

Figure 3-12
Female-headed Households and Households with Children, 1990-2008

	1990		2000		2008	
	#	%	#	%	#	%
Total Households	**8,745**	**100.0%**	**8,932**	**100.0%**	**8,683**	**100.0%**
Family Households	5,919	67.7%	5,636	63.1%	5,610	64.6%
Married-couple family	4,455	50.9%	3,950	44.2%	3,833	44.1%
With Children	**2,053**	**23.5%**	**1,602**	**17.9%**	**1,445**	**16.6%**
Without Children	2,402	27.5%	2,348	26.3%	2,388	27.5%
Female-Headed Households	**1,135**	**13.0%**	**1,265**	**14.2%**	**1,368**	**15.8%**
With Children	**741**	**8.5%**	**774**	**8.7%**	**675**	**7.8%**
Without Children	394	4.5%	491	5.5%	693	8.0%
Male-Headed Household	329	3.8%	421	4.7%	409	4.7%
With Children	**151**	**1.7%**	**179**	**2.0%**	**312**	**3.6%**
Without Children	178	2.0%	242	2.7%	97	1.1%
Non-family and 1-person Households	2,826	32.3%	3,296	36.9%	3,073	35.4%

Sources: U.S. Census Bureau, 1990 (SFT-3, P019), Census 2000 (SF-3, P10); 2006-2008 American Community Survey (B11001, B11003)

Female-headed households with children often experience difficulty in obtaining housing, primarily as a result of lower-incomes and the unwillingness of some landlords to rent their units to families with children. In Alliance, female-headed households with children accounted for 54.6% of all families living in poverty, although they comprised only 15.9% of all families.[14]

Observation

Female-headed households with children were more likely to live in poverty.

Female-headed households with children accounted for more than half of all families living in poverty. Consequently, securing affordable housing will be especially difficult for this segment of the population.

viii. Ancestry and Income

It is illegal to refuse the right to housing based on place of birth or ancestry. Census data on native and foreign-born populations in Alliance revealed that in 2008, 1.3% of residents were foreign-born.[15]

Among families with children who were living with one or more foreign-born parents, 100% were living in households with incomes of less than 200% of the poverty level. By comparison, 65.7% of families with only native parents were living in households with incomes below 200% of the poverty level.[16]

[14] U.S. Census Bureau, Census 2000 (SF3, P90)
[15] U.S. Census Bureau, 2006-2008 American Community Survey (C05002)
[16] U.S. Census Bureau, 2006-2008 American Community Survey (C05010)

Persons with limited English proficiency (LEP) are defined by the federal government as persons who have a limited ability to read, write, speak or understand English. HUD issued its guidelines on how to address the needs of persons with LEP in January 2007. HUD uses the prevalence of persons with LEP to identify the potential for impediments to fair housing choice due to their inability to comprehend English. Persons with LEP may encounter obstacles to fair housing by virtue of language and cultural barriers within their new environment. To assist these individuals, it is important that a community recognizes their presence and the potential for discrimination, whether intentional or inadvertent, and establishes policies to eliminate barriers. It is also incumbent upon HUD entitlement communities to determine the need for language assistance and comply with Title VI of the Civil Rights Act of 1964.

American Community Survey data indicate that hundreds of Alliance residents spoke English less than "very well" in 2009, a circumstance that could impede their access to City programs and services.[17]

Observation

In 2009, 318 residents spoke English less than "very well" in Alliance. Of these, about half were native Spanish-speakers.

ix. Protected Class Status and Unemployment

In 2008, unemployment in Alliance was 10.2%, which was considerably higher than Ohio's rate of 7.0% and Stark County's rate of 7.1%, as indicated in Figure 3-13. Because of the small population of racial and ethnic minorities within the City, information was not available for any of these groups.

[17] U.S. Census Bureau, 2005-2009 American Community Survey (B16001)

Figure 3-13
Civilian Labor Force, 2008

Civilian Labor Force	Ohio		Stark County		Alliance	
	Total	**%**	**Total**	**%**	**Total**	**%**
Total CLF	**5,906,242**	**100.0%**	**196,756**	**100.0%**	**11,188**	**100.0%**
Employed	5,490,147	93.0%	182,735	92.9%	10,042	89.8%
Unemployed	416,095	7.0%	14,021	7.1%	1,146	10.2%
Male CLF	**3,079,988**	**100.0%**	**101,088**	**100.0%**	**5,605**	**100.0%**
Employed	2,853,623	92.7%	93,260	92.3%	5,027	89.7%
Unemployed	226,365	7.3%	7,828	7.7%	578	10.3%
Female CLF	**2,826,254**	**100.0%**	**95,668**	**100.0%**	**5,583**	**100.0%**
Employed	2,636,524	93.3%	89,475	93.5%	5,015	89.8%
Unemployed	189,730	6.7%	6,193	6.5%	568	10.2%
White CLF	**5,071,905**	**100%**	**101,150**	**100.0%**	**9,841**	**100.0%**
Employed	4,766,453	94.0%	90,089	89.1%	8,943	90.9%
Unemployed	305,452	6.0%	11,061	10.9%	898	9.1%
Black CLF	**619,629**	**100.0%**	**12,343**	**100.0%**	**--**	**--**
Employed	526,938	85.0%	9,926	80.4%	--	--
Unemployed	92,691	15.0%	2,417	19.6%	--	--

Source: U.S. Census Bureau, 2006-2008 American Community Survey (C23001, C23002A, C23002B)

B. Housing Market

i. Housing Inventory

In Alliance, the total housing stock increased 7.7% between 1990 and 2009. Three census tracts lost units during this period, as highlighted in Figure 3-14.

Figure 3-15 depicts the location of the areas where higher rates of new housing development occurred since 1990. The three tracts where units were lost coincide with the priority areas identified by the City for neighborhood stabilization and revitalization through CDBG investment. Much of these areas have relatively high proportions of racial minority and lower-income residents. However, tract 7102, also an area of relatively high minority population, gained 569 units during those years, an inventory expansion of 53%.

Figure 3-14
Trends in Total Housing Units, 1990-2009

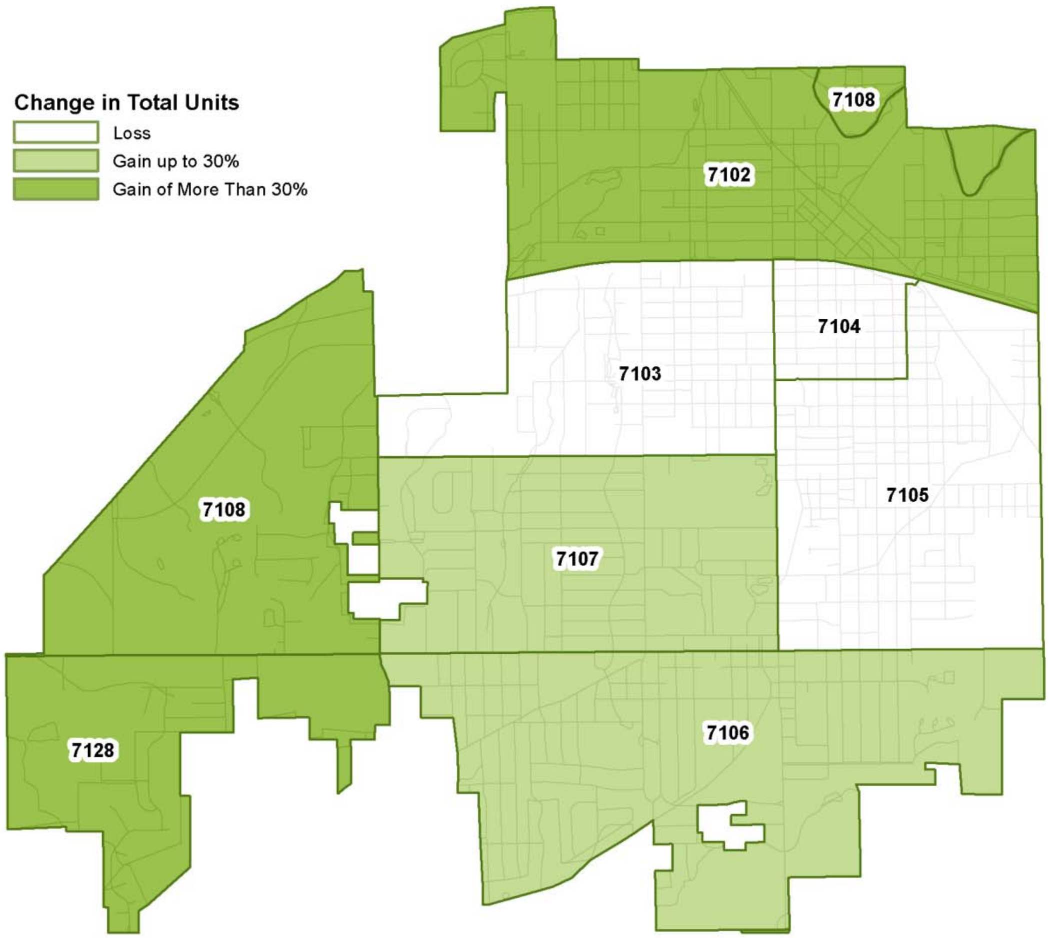
	1990		2000		2009		Change 1990-2009	
Census Tract	#	% of Total Housing Units	#	% of Total Housing Units	#	% of Total Housing Units	#	%
Alliance	**9,589**	**100.0%**	**9,661**	**100.0%**	**10,326**	**100.0%**	**737**	**7.7%**
7101**	558	5.8%	---	---	---	---	---	---
7102*	1,073	11.2%	1,634	16.9%	1,642	15.9%	569	53.0%
7103*	1,524	15.9%	1,499	15.5%	1,504	14.6%	-20	-1.3%
7104	803	8.4%	726	7.5%	785	7.6%	-18	-2.2%
7105	2,098	21.9%	2,036	21.1%	2,032	19.7%	-66	-3.1%
7106*	1,736	18.1%	1,923	19.9%	2,224	21.5%	488	28.1%
7107*	1,239	12.9%	1,264	13.1%	1,329	12.9%	90	7.3%
7108*	367	3.8%	372	3.9%	538	5.2%	171	46.6%
7128*	171	1.8%	187	1.9%	272	2.6%	101	59.1%
8130*	31	0.3%	20	0.2%	0	0.0%	-31	-100.0%

**Data in starred census tracts reflects only the parts of the tracts within the City of Alliance.*
***Census Tract 7101 was within Alliance's borders in 1990 but was not within the boundaries for Census 2000 and subsequent estimates*
Source: U.S. Census Bureau

Observation

While the City of Alliance as a whole experienced a 7.7% increase in housing stock, individual neighborhoods grew at drastically different rates. Tract 7102, one of the City's targeted investment areas, had 569 more housing units in 2009 than in 1990, a gain of 53%.

Figure 3-15
Map: Change in Total Units by Census Tract, 1990-2009



ii. Types of Housing Units

Alliance's housing stock is comprised of mostly single-family units, which accounted for 69.9% of the total housing stock in 2000. Multi-family units comprised 29.8% of all units in Alliance. Most multi-family units (56.4%) were two to four family structures; structures with more than twenty units comprised 14.5% of all multi-family units.

In tract 7104, an area of relatively high Black population, multi-family units comprised over three-quarters of the total housing stock. Single-family units comprised the majority of units in 7102, another area where many Black families live. Details appear in Figure 3-16.

Figure 3-16
Trends in Housing Units in Structures, 2000

Census Tract	Total Units	Single-family units	Multi-family units					Mobile Homes
			2 to 4	5 to 9	10 to 19	20 or more	Total	
Alliance	**9,661**	**6,750**	**1,622**	**403**	**432**	**418**	**2,875**	**36**
7102*	1,634	1,250	350	23	0	0	373	11
7103*	1,499	1,122	282	37	42	16	377	0
7104	726	177	250	93	27	179	549	0
7105	2,036	1,389	494	25	0	111	630	17
7106*	1,923	1,536	97	88	175	27	387	0
7107*	1,264	1,059	58	7	101	39	205	0
7108*	372	150	32	68	76	46	222	0
7128*	187	55	59	62	11	0	132	0
8130*	20	12	0	0	0	0	0	8

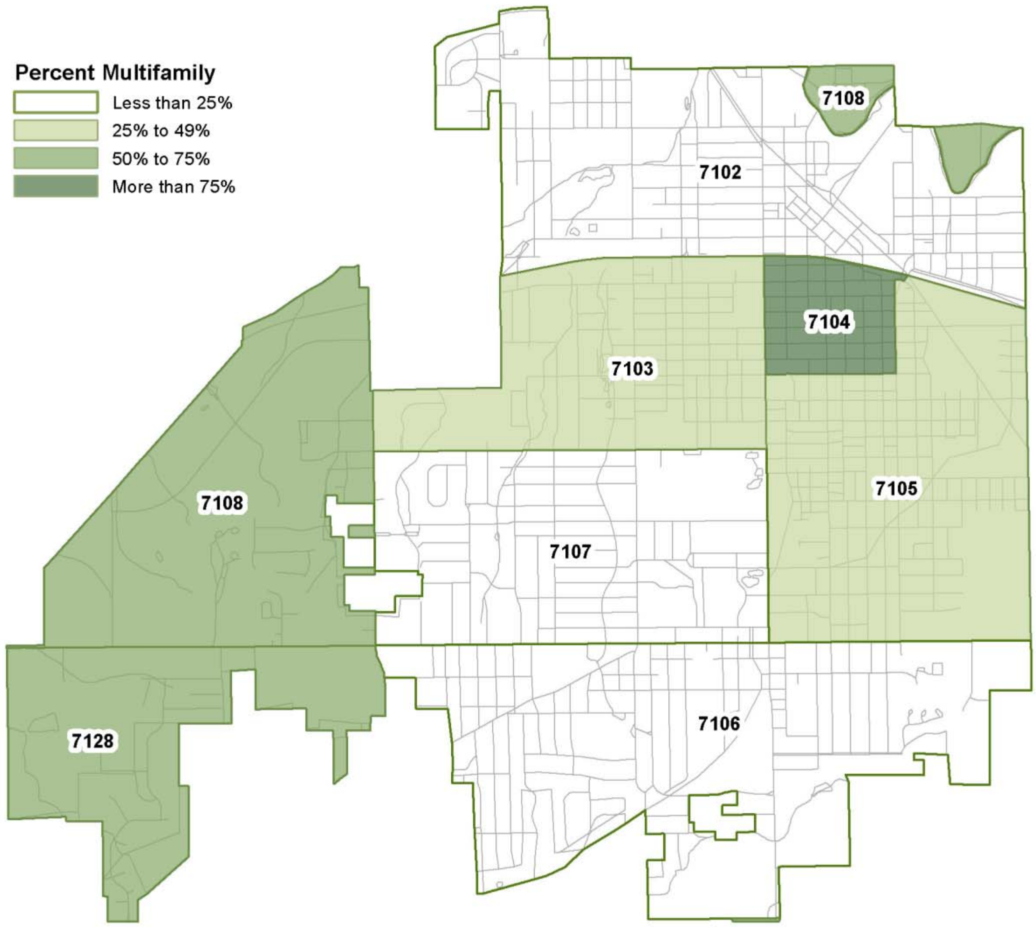
**Data in starred census tracts reflects only the parts of the tracts within the City of Alliance.*
Source: U.S. Census Bureau, Census 2000 (SF 3, H30)

Observation

Multi-family units are spread among all of the City's census tracts, but exist by the highest percentage in census tracts with the most minority residents.

In census tract 7104, multi-family units comprised over three-quarters of the housing stock.

Figure 3-17
Map: Multifamily Units as a Percent of Total Housing by Census Tract, 2000



iii. Foreclosure Trends

HUD NSP Estimates provides foreclosure data at the local level.[18] Between January 2007 and June 2008, the City of Alliance had an estimated 388 foreclosure filings, representing a foreclosure rate of 10.4%. In three tracts, the foreclosure rate was higher than the City overall, including tracts 7103, 7104, and 7105. One of these tracts (7104) is noted as a higher-poverty area with many minority residents.

[18] HUD NSP Estimates data, covering the period between January 2007 and June 2008, is not an exact count, but distributes the results of a national survey across geographic areas according to a model considering rates of metropolitan area home value decline, unemployment and high-cost mortgages.

Figure 3-18
Estimated Residential Foreclosure Rates by Census Tract, January 2007 – June 2008

Census tract	Foreclosure Filings	Total Mortgages	Foreclosure Rate
Alliance	**388**	**3,737**	**10.4%**
7103*	85	741	11.5%
7104	10	58	17.2%
7105	79	567	13.9%
7106*	78	1,049	7.4%
7107*	45	579	7.8%
7108*	94	1,121	8.4%
7128*	75	1,000	7.5%
8130*	66	847	7.8%

**Starred census tracts are partially contained within the City. Therefore, census tract totals may be more than the City overall.*
Source: HUD NSP Foreclosure Estimates, released October 2008

In September 2010, RealtyTrac reported 44 new foreclosure filings in Alliance, or 1 in every 361 housing units.

Foreclosure activity is related to fair housing to the extent that it is disproportionately dispersed, both geographically and among members of the protected classes. Concentrated foreclosures and residential vacancy threaten the viability of neighborhoods as well as the ability of families to maintain housing and build wealth. Households carrying heavy cost burdens are prime candidates for mortgage delinquency and foreclosure.

Observation

Between January 2007 and June 2008, Alliance had a foreclosure rate of 10.4%.

The census tract with the highest foreclosure rate, 17.2%, is noted as a higher-poverty area with many minority residents.

iv. Protected Class Status and Home Ownership

The value in home ownership lies in the accumulation of wealth as the owner's share of equity increases with the property's value. Paying a monthly mortgage instead of rent is an investment in an asset that is likely to appreciate. According to one study, "a family that puts 5 percent down to buy a house will earn a 100 percent return on the investment every time the house appreciates 5 percent."[19]

[19] Kathleen C. Engel and Patricia A. McCoy, "From Credit Denial to Predatory Lending: The Challenge of Sustaining Minority Homeownership," in *Segregation: The Rising Costs for America,* edited by James H. Carr and Nandinee K. Kutty (New York: Routledge 2008) p. 82.

In Alliance in 2000, minority households were less likely than Whites to own their home. Among Whites, the home ownership rate was 61.7%. By comparison, 51.7% of Black households were home owners and 48.6% of Hispanic households. No Asian household in the City owned their home, though the total number of Asian households was only 14.

Figure 3-19
Home Ownership by Race and Ethnicity, 2000

Census Tract	White		Black		Asian		Hispanic	
	#	%	#	%	#	%	#	%
Alliance	**4,823**	**61.7%**	**436**	**51.7%**	**0**	**0.0%**	**36**	**48.6%**
7102*	664	56.2%	167	58.2%	--	--	12	46.2%
7103*	906	69.2%	33	61.1%	--	--	12	50.0%
7104	74	16.8%	11	9.6%	--	--	0	0.0%
7105	779	55.1%	189	56.1%	0	0.0%	12	66.7%
7106*	1,324	74.2%	16	100.0%	--	--	--	--
7107*	916	78.2%	20	100.0%	--	--	--	--
7108*	114	35.7%	0	0.0%	--	--	--	--
7128*	38	22.0%	--	--	--	--	--	--
8130*	8	40.0%	--	--	--	--	--	--

**Data in starred census tracts reflects only the parts of the tracts within the City of Alliance.*
Note: Cells for tracts in which no member of a racial or ethnic group live are left blank to differentiate them from tracts in which only renters live.
Source: U.S. Census Bureau, Census 2000 (SF3-H11, H12)

As discussed previously in this report, median household income is lower among Black households in Alliance than among White households. This factor contributes to the low rates of home ownership among minorities in the City.

Observation

Higher unemployment and lower household income among Blacks are reflected in lower home ownership rates when compared to Whites.

Among Black households, 51.7% were home owners, compared to 61.7% of White households.

v. The Tendency of the Protected Classes to Live in Larger Households

Larger families may be at risk for housing discrimination on the basis of race and the presence of children (familial status). A larger household, whether or not children are present, can raise fair housing concerns. If there are policies or programs that restrict the number of persons that can live together in a single housing unit, and members of the protected classes need more bedrooms to accommodate their larger household, there is a fair housing concern because the restriction on the size of the unit will have a negative impact on members of the protected classes.

Blacks were more likely than Whites to live in larger families. In 2000, almost two-thirds of Black families had three or more persons, compared to 54.4% of White families. Among families of two or more races, 51.4% were in households considered large.

Figure 3-20
Families with Three or More Persons, 2000

Race	Percent of Families with Three or More Persons
White	54.4%
Black	64.6%
Two or More Races	51.4%

Source: U.S. Census Bureau, Census 2000 (SF 4, PCT17)

To adequately house larger families, a sufficient supply of larger dwelling units consisting of three or more bedrooms is necessary. In Alliance, 30.7% of the rental housing stock contained three or more bedrooms in 2000 compared to 75.6% of the owner-occupied housing stock. Given the lower rates of home ownership among minority households, this suggests larger minority families may have a more difficult time finding adequate units with a sufficient number of bedrooms, which may result in overcrowding.

Figure 3-21
Housing Units by Number of Bedrooms, 2000

Size of Housing Units	Renter-Occupied Housing Stock		Owner-Occupied Housing Stock	
	Number of Units	% Total Units	Number of Units	% Total Units
0-1 bedroom	1,061	30.3%	104	1.9%
2 bedrooms	1,365	39.0%	1,203	22.5%
3 or more bedrooms	**1,076**	**30.7%**	**4,044**	**75.6%**
Total	3,502	100.0%	5,351	100.0%

Source: U.S. Census Bureau, Census 2000 (SF 3, H42)

Observation

Black households were much more likely to live in larger families than White households.

Almost two-thirds of Black families had three or more persons compared to 54.4% of White families. However, only 30.7% of the rental housing stock contains three or more bedrooms compared to 75.6% of the owner housing stock.

Increasing housing costs are not a direct form of housing discrimination. However, a lack of affordable housing does constrain housing choice. Residents may be limited to a smaller selection of neighborhoods because of a lack of affordable housing in those areas.

In Alliance, the median housing value increased 35.3% between 1990 and 2008, after adjusting for inflation. Most of this growth was during the 1990s; between 2000 and 2008, housing value actually decreased 2.9%. Median gross rent grew more modestly, at 4.4%. By comparison, median household income decreased 6.3% during this period, with the most rapid income loss occurring between 2000 and 2008. During these eight years, median income decreased 13.7%.

Figure 3-22

Trends in Housing Value, Rent and Income, 1990-2008

	Median Housing Value (in 2008 $)	Median Gross Rent (in 2008 $)	Median Household Income (in 2008 $)
1990			
Alliance	$64,080	$517	$34,645
Stark County	$99,664	$618	$48,360
2000			
Alliance	$89,272	$548	$37,607
Stark County	$129,621	$628	$51,466
2008			
Alliance	$86,700	$540	$32,447
Stark County	$129,900	$610	$45,306
%Change 1990-2008			
Alliance	35.3%	4.4%	-6.3%
Stark County	30.3%	-1.3%	-6.3%

Sources: U.S. Census Bureau, 1990 Census (STF3-H061A, H043A, P080A), Census 2000 (SF3-H76, H63, P53), 2006-2008 American Community Survey (B25077, B25064, B19013); Calculations by Mullin & Lonergan Associates, Inc.

a. Rental Housing

While median household income has failed to keep pace with housing costs, Alliance also has lost a large number of affordable rental units. Between 2000 and 2008, the number of affordable rental units renting for less than $500 a month decreased almost 40% in Alliance. Units renting for more than $1,000, on the other hand, increased more than ten-fold, from 22 units in 2000 to 261 in 2008.

Figure 3-23
Loss of Affordable Rental Housing Units, 2000-2008

Units Renting for:	2000	2008	Change 2000-2008 #	Change 2000-2008 %
Less than $500	2,213	1,357	-856	-38.7%
$500 to $699	833	1,454	621	74.5%
$700 to $999	243	666	423	174.1%
$1,000 or more	22	261	239	1086.4%

Sources: U.S. Census Bureau, Census 2000 (SF3, H62), 2006-2008 American Community Survey (B25063)

Observation

Alliance lost over 800 units renting for less than $500 between 2000 and 2008.

By comparison, units renting for more than $1,000 increased tenfold, from 22 to 261.

The National Low Income Housing Coalition provides annual information on the Fair Market Rent (FMR) and affordability of rental housing in counties and cities in the U.S. for 2010. In Stark County, the FMR for a two-bedroom apartment is $644. In order to afford this level of rent and utilities, without paying more than 30% of income on housing, a household must earn $2,147 monthly or $25,760 annually. Assuming a 40-hour work week, 52 weeks per year, this level of income translates into a Housing Wage of $12.38.

In Stark County, a minimum wage worker earns an hourly wage of $7.30. In order to afford the FMR for a two-bedroom apartment, a minimum wage earner must work 68 hours per week, 52 weeks per year. Or, a household must include 1.7 minimum wage earners working 40 hours per week year-round in order to make the two-bedroom FMR affordable.

In Stark County, the estimated average wage for a renter is $10.46 an hour. In order to afford the FMR for a two-bedroom apartment at this wage, a renter must work 47 hours per week, 52 weeks per year. Or, working 40 hours per week year-round, a household must include 1.2 workers earning the average renter wage in order to make the two-bedroom FMR affordable.

Observation

Minimum wage and single-income households cannot afford a housing unit renting for the HUD fair market rent in Alliance and Stark County.

This situation forces these individuals and households to double-up with others, or lease inexpensive, substandard units. Minorities and female-headed households will be disproportionately impacted because of their lower-incomes.

Monthly Supplemental Security Income (SSI) payments for an individual are $674 in Stark County and across Ohio. If SSI represents an individual's sole source of income, $202 in monthly rent is affordable, while the FMR for a one-bedroom is $510.

Observation

Persons with disabilities receiving a monthly SSI check of $674 as their sole source of income cannot afford a one-bedroom unit renting at the fair market rate of $510.

b. Sales Housing

One method used to determine the inherent affordability of a housing market is to calculate the percentage of homes that could be purchased by households at the median income level. The median household income in the City of Alliance was $32,447 in 2008. With this income, a household could purchase a home selling for $121,200, which was well above Stark County's average sales price of $100,901.

It is possible also to determine the affordability of the housing market for each racial or ethnic group in the City. To determine affordability (i.e., how much mortgage a household could afford), the following assumptions were made:

- The mortgage was a 30-year fixed rate loan at a 5.0% interest rate,
- The buyer made a 10% down payment on the sales price,
- Principal, interest, taxes and insurance (PITI) equaled no more than 30% of gross monthly income,
- Property taxes were assessed for the Alliance City School District 2009 tax rate of 1.441% of the market price, and
- There was no additional consumer debt (credit cards, etc).

Figure 3-24 details the estimated *maximum* affordable sales prices and monthly PITI payments for Whites, Blacks, Asians and Hispanics in Alliance. White, Black and Hispanic households have relatively comparable median household incomes and therefore are able to afford similarly priced units. All three groups have maximum affordable purchase prices that are $20,000 greater than the County's average sales price. Asian households, who had the highest median household income in 2008, were able to afford units up to $164,500. This suggests that the sales market is relatively affordable to all of the major racial and ethnic groups within Alliance. Consequently, there may be reasons other than cost (i.e., credit, debt-to-income ratio, etc.) that determine the ability of minorities, in particular Blacks households, to become home owners.

Figure 3-24
Maximum Affordable Purchase Price by Race/Ethnicity, 2009

	Median Household Income	Monthly Mortgage Payment: Mortgage Principal & Interest	Monthly Mortgage Payment: Real Estate Taxes	Monthly Mortgage Payment: Homeowner's Insurance & PMI	Monthly Mortgage Payment: Total PITI Payment	Maximum Affordable Purchase Price
Alliance City	**$32,447**	**$586**	**$146**	**$80**	**$811**	**$121,200**
Whites	$32,652	$590	$147	$80	$816	$122,100
Blacks	$30,327	$543	$135	$80	$758	$121,400
Asians	$42,901	$795	$198	$80	$1,073	$164,500
Hispanics	$32,636	$589	$146	$80	$816	$122,000
2009 Stark County Average Sales Price: $100,901						

Sources: 2006-2008 American Community Survey (B19013, B19013A, B19013B); Stark County Association of Realtors; Stark County Auditor's Office; Calculations by Mullin & Lonergan Associates, Inc.

c. Protected Class Status and Housing Problems

Lower-income minority households tend to experience housing problems at higher rates than lower-income White households.[20] Among renter households earning less than 80% MFI in Alliance, Black households were more likely (57.2%) than Whites (53.8%) to have a housing problem. The exception is among all other households, where 56.6% of White households had at least one housing problem, compared to 29.4% of Black households.

Black owner households were also more likely than Whites to have a housing problem, with 43.3% of Black households with at least one problem compared to 32.0% of White households. The exception among owners was Black family households, of which 39.5% had at least one problem, versus 43.1% of White households. Notably, 100% of all other Black households experienced a housing problem in 2000, the most recent year for which data is available.

Figure 3-25
Lower-Income Households with Housing Problems, 2000

	Total Households 0-80% of MFI		Elderly & 1-2 Person Households 0-80% of MFI		Family Households 0-80% of MFI		All Other Households 0-80% of MFI	
	Total	Housing Problem	Total	%	Total	%	Total	%
Renters								
White Non-Hispanic	1,940	53.8%	487	48.9%	817	54.4%	636	56.6%
Black Non-Hispanic	329	57.2%	42	71.4%	212	64.1%	72	29.4%
Total	**2,261**	**53.7%**	**499**	**49.1%**	**1,029**	**55.3%**	**733**	**54.7%**
Owners								
White Non-Hispanic	1,741	32.0%	951	24.1%	576	43.1%	214	37.4%
Black Non-Hispanic	240	43.3%	127	31.5%	81	39.5%	32	100.0%
Total	**2,027**	**33.5%**	**1,095**	**25.4%**	**673**	**40.6%**	**259**	**49.0%**

Source: HUD Comprehensive Housing Affordability Strategy data

[20] HUD defines housing problems as (1) cost burden of 30% or more (i.e. paying more than 30% of gross income on monthly housing expenses), and/or (2) lacking complete kitchen or plumbing facilities, and/or (3) overcrowding of more than 1.01 persons per room.

Observation

Lower-income Black households experienced housing problems at greater rates than White households.

Among renter households, 57.2% of Blacks had housing problems compared to 53.8% of Whites. Similarly, among owner households, 43.3% of Blacks had housing problems compared to 32.0% of Whites.

C. Review of Public Sector Policies

The analysis of impediments is a review of impediments to fair housing choice in the public and private sector. Impediments to fair housing choice are any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status or national origin that restrict housing choices or the availability of housing choices, or any actions, omissions or decisions that have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex, disability, familial status or national origin. Policies, practices or procedures that appear neutral on their face but which operate to deny or adversely affect the provision of housing to persons of a particular race, color, religion, sex, disability, familial status, or national origin may constitute such impediments.

An important element of the AI includes an examination of public policy in terms of its impact on housing choice. This section evaluates the public policies in the City of Alliance to determine opportunities for furthering the expansion of fair housing choice.

i. Policies Governing Investment of Federal Entitlement Funds

From a budgetary standpoint, housing choice can be affected by the allocation of staff and financial resources to housing related programs and initiatives. The decline in federal funding opportunities for affordable housing for lower income households has shifted much of the challenge of affordable housing production to state, county and local government decision makers.

The recent Westchester County, NY, fair housing settlement also reinforces the importance of expanding housing choice in non-impacted areas (i.e. areas outside of concentrations of minority and LMI persons). Westchester County violated its cooperation agreements with local units of government which prohibit the expenditure of CDBG funds for activities in communities that do not affirmatively further fair housing within their jurisdiction or otherwise impede the County's action to comply with its fair housing certifications.

The City of Alliance's federal entitlement funds received from HUD can be used for a variety of activities to serve a variety of aims, as follows:

- Community Development Block Grant (CDBG): The primary objective of this program is to develop viable urban communities by providing decent housing, a suitable living environment, and economic opportunities, principally for persons of low and moderate income levels. Funds can be used for a wide array of activities, including: housing rehabilitation, homeownership assistance, lead-based paint detection and removal, construction or rehabilitation of public facilities and infrastructure, removal of architectural barriers, public services, rehabilitation of commercial or industrial buildings, and loans or grants to businesses.

- HOME Investment Partnerships Program (HOME): The HOME program provides federal funds for the development and rehabilitation of affordable rental and ownership housing for low and moderate income households. HOME funds can be used for activities that promote affordable rental housing and homeownership by low and moderate income households, including reconstruction, moderate or substantial rehabilitation, homebuyer assistance, and tenant-based rental assistance.

In addition, the City also receives funding from the Neighborhood Stabilization Program (NSP), which was established for the purpose of stabilizing communities that have suffered from foreclosures and abandonment. Through the purchase and redevelopment of foreclosed and abandoned homes and residential properties, the goal of the program is being realized. NSP1, a term that references the NSP funds authorized under Division B, Title III of the Housing and Economic Recovery Act (HERA) of 2008, provides grants to all states and selected local governments on a formula basis.

As a member of the Stark County HOME Consortium, the City of Alliance accounts for its CDBG and NSP funds in its Five-Year Consolidated Plan and annual plans. HOME funds are administered by the Stark County Regional Planning Commission and accounted for in countywide planning documents. The City's Department of Planning and Development invests HUD entitlement resources according to the following overarching policy:

> “The City of Alliance Planning and Development Department focuses on creating viable neighborhoods and providing decent housing and economic opportunity for all community residents. This community vision recognizes that housing is a critical part of a viable neighborhood system, which also includes public safety, education, employment opportunities, business development and social service providers. These priorities represent a comprehensive approach to neighborhood vitality, housing availability, affordability for all residents and adding value to the community.”

In order to achieve these aims, the City's CDBG, HOME and NSP program activities focus on blight elimination, citizen participation in monitoring problem properties and organizing efforts to improve life quality and economic integration and revitalization of neighborhoods, as well as job creation to address poverty. The City's housing strategy prioritizes access to affordable housing, blight elimination and the provision of housing rehabilitation assistance to eligible LMI households.

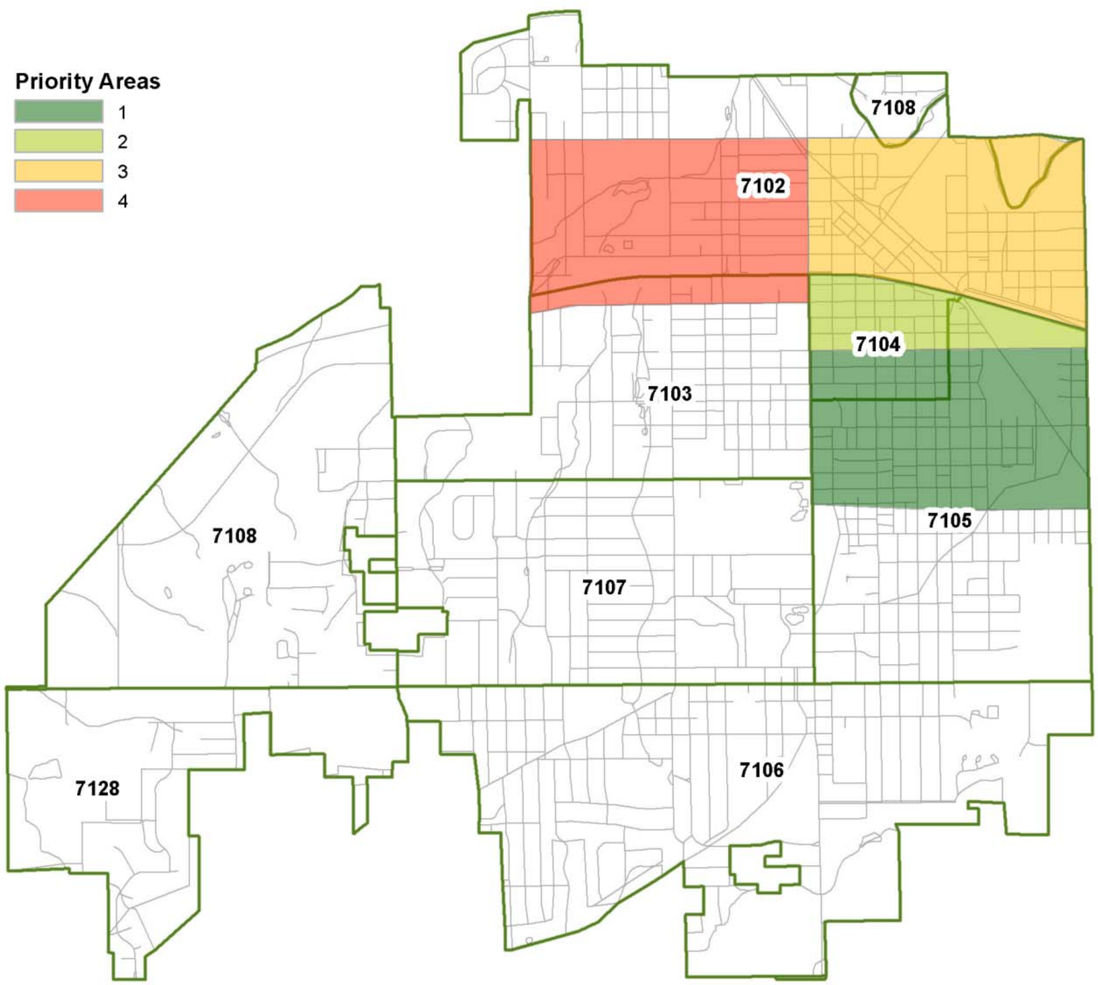
a. Targeted Geographic Areas

Generally, the City limits its CDBG spending to four identified priority areas, as shown in the following map. These areas represent high percentages of LMI individuals and housing structures or public infrastructure that is comparatively older or more deteriorated. In defining these boundaries, the City's goal is to direct funds into planned areas to coordinate housing rehabilitation activities with street improvements to build viable neighborhoods. Funding limitations at the federal level require that the City apply its resources strategically, and the City aims to concentrate improvements in high-priority areas to maximize results.

CDBG subrecipient agencies in Alliance must provide benefits to residents of at least one of the four priority areas. Applications from subrecipients are scored on a variety of measures and assigned numerical values. If the project is not located in one of the priority areas, it receives a zero in the geographic location category. Based on the factors listed in the previous paragraph, proposed projects in Priority Area 1 (60% LMI) receive 20 points; those in Priority Area 2 (84% LMI) receive 15 points; those in Priority Area 3 (74% LMI) receive 10 points; and those in Priority Area 4 (63% LMI) are awarded 5 points.

The effect of the City's scoring system for potential CDBG projects is that CDBG-funded activities in Alliance occur nearly exclusively in the neighborhoods most impacted by poverty and racial concentration.

Figure 3-26
Map: Targeted CDBG/NSP Investment Areas, 2009



Observation

Because the City of Alliance focuses its limited entitlement dollars on CDBG and NSP activities that do not have the intent or result of creating new housing opportunities outside of impacted areas, it is important that the City works closely with the Stark County Regional Planning Commission to ensure that HOME project sites are selected to serve this objective.

The City applies the CDBG entitlement dollars under its direct control to the improvement of public infrastructure, housing stock and the quality of life in impacted neighborhoods. However, these activities do not create new housing opportunities for members of the protected classes in non-impacted areas. The City's commitment to affirmatively further fair housing requires that it take meaningful steps to expand opportunity for these groups. To do so, the City should be working closely with the County to identify new HOME project sites outside of impacted areas.

b. Affirmative Marketing Policy

As a recipient of CDBG and HOME funds, the City is required to adopt affirmative marketing procedures and requirements for all CDBG- and HOME-assisted housing with five or more units. Such a plan should include:

- Methods of informing the public, owners, and potential tenants about fair housing laws and the City's policies
- A description of what the owners and/or the City will do to affirmatively market housing assisted with CDBG or HOME funds
- A description of what the owners and/or the City will do to inform persons not likely to apply for housing without special outreach
- Maintenance of records to document actions taken to affirmatively market CDBG- and HOME-assisted units and to assess marketing effectiveness, and
- A description of how efforts will be assessed and what corrective actions will be taken where requirements are not met.

The Stark County Regional Planning Commission administers HOME funds in the City of Alliance and is responsible for the affirmative marketing of HOME-assisted units. As an administrator of CDBG grants, the City is responsible for the affirmative marketing of any CDBG-assisted housing developments of five or more units. Typically, this type of project is completed through the use of HOME funds. According to the 2010-2014 Consolidated Plan and 2010 Annual Action Plan, the City has no immediate plans to apply CDBG resources to any activity that would trigger affirmative marketing compliance. Therefore, affirmative marketing procedures are not incorporated into the Five-Year Consolidated Plan or annual plans.

Observation

Though the City typically does not apply CDBG resources to activities that would trigger compliance with affirmative marketing regulations, the City should adopt a general affirmative marketing policy.

Outlining affirmative marketing requirements would clarify the City's policy stance on fair housing. It would also establish consistent procedure for any future CDBG activity affecting housing with five or more units.

c. Site and Neighborhood Selection Policy

Recipients of HOME funds are required to administer their program in compliance with the regulations found at 24 CFR 983.6(b), known as the Site and Neighborhood Standards. These standards address the site location requirements for newly constructed rental units financed with HOME funds.

Site selection for HOME-assisted construction of new rental units must comply with several standards, including among other things, promoting greater choice of housing opportunities and avoiding undue concentration of assisted persons in areas containing a high concentration of LMI persons. With few exceptions, site selection must include a location that is not in an area of minority concentration.

The City of Alliance does not have direct control over site selection for HOME-funded projects, as they are administered by the Stark County Regional Planning Commission. However, the City can and should work closely with the Commission to ensure that the funds are spent to expand housing opportunities outside of impacted areas. By virtue of its administration of the HOME program across rural, suburban and urban areas, the Commission has an excellent opportunity to ensure that new affordable housing is not confined to areas of poverty and minority concentration.

ii. Appointed Boards and Commissions

A community's sensitivity to fair housing issues is often determined by people in positions of public leadership. The perception of housing needs and the intensity of a community's commitment to housing related goals and objectives are often measured by board members, directorships, and the extent to which these individuals relate within an organized framework of agencies, groups, and individuals involved in housing matters. The expansion of fair housing choice requires a team effort and public leadership and commitment is a prerequisite to strategic action.

Planning Commission

The Planning Commission is a seven-member body appointed by the Mayor. The Commission is responsible for amending the zoning code when necessary, reviewing all site plans in the City, reviewing applications for conditional use and subdivision variances, and developing the City's Comprehensive Plan. As of March 2011, the Commission had seven members, including 6 White males and one White female.

Zoning Board of Appeals

The Zoning Board of Appeals is a five-member body appointed by the Mayor. The Board hears appeals to decisions made regarding the City's zoning code and map. Additionally, the Board may grant a variance from the City's zoning code. As of March 2011, the Board had five members, all of whom were White males.

Observation

Of the 12 combined members of Alliance's Planning Commission and Zoning Board, 11 are White males.

In appointing members of the public to serve on professionally oriented volunteer boards such as these, relevant expertise and experience is often the primary concern. However, providing representation of the community at large should also be a goal. The City should strive to recruit and involve qualified members of the protected classes in community leadership as it relates to housing issues. Alternately, the City could assemble an additional, more representative board to advise on housing-related policy matters in general.

iii. Accessibility of Residential Dwelling Units

From a regulatory standpoint, local government measures define the range and density of housing resources that can be introduced in a community. Housing quality standards are enforced through the local building code and inspections procedures.

The City of Alliance has adopted the Ohio Building Code to apply to the construction and alteration of every building and structure in the City. One-, two- and three-family dwellings are also subject to the Residential Building Code of Ohio. Additional building code standards include:

- 2007 Ohio Mechanical Code
- 2007 Ohio Plumbing Code
- 2008 National Electric Code
- BOCA National Property Maintenance Code

Per the Ohio Building Code, accessibility standards for units are based on the ADA Accessibility Guidelines. The City's Building Department's Code Enforcement Division is responsible for residential, commercial and industrial code enforcement.

iv. Language Access Plan for Persons with Limited English Proficiency

The City of Alliance does not currently have a Language Access Plan (LAP) to enhance services offered to persons with LEP. As stated previously, there are an estimated 318 persons with LEP in Alliance, half of whom are native Spanish speakers. Among the Spanish-speaking population in the City, 47.4% speak English less than "very well." As a result, the City of Alliance should perform a four-factor analysis to determine the extent to which an LAP may be needed.[21]

Observation

As of 2009, there were 318 persons in Alliance with limited English proficiency, about half of whom spoke Spanish.

The City should conduct the four-factor analysis outlined at *www.lep.gov* to determine the extent to which the translation of vital documents is necessary to assist persons with limited English proficiency (LEP) in accessing County programs and services. This action could be undertaken as a regional Consortium activity coordinated by SCRPC.

v. Comprehensive Planning

A community's comprehensive plan is a statement of policies relative to new development and preservation of existing assets. In particular, the land use element of the comprehensive plan defines the location, type and character of future development. The housing element of the comprehensive plan expresses the preferred density and intensity of residential neighborhoods within the City. Taken together, the land use and housing elements of the comprehensive plan define a vision of the type of community that the City of Alliance wishes to become.

Alliance's Comprehensive Land Use Plan, adopted in 2004, was determined by the Stark County Regional Planning Commission to be consistent with the regional 2030 Comprehensive/Transportation Plan, adopted in 2005. The Plan was developed by McKenna Associates, Inc., with the aid of City staff members, City officials and substantial community and stakeholder input. The Plan proposes policy actions based on empirical data on the demographic, housing and economic conditions in the City and formulaic projections for future trends and needs.

The Plan identifies the following conditions affecting housing in Alliance:

- Stock that was roughly 60% owner occupied, lower than state and Stark County averages of approximately 70%. The higher prevalence of renter housing is partially attributed to a) the City's location in a rural region, in which apartments are more typically located in more heavily developed areas with the infrastructure to support higher-density housing, and b) university students living in private off-campus rental units.
- Aging stock, with more than 80% of units constructed prior to 1970
- Stock that was of size and quality typical of the county and state, with 5.7 median rooms per unit, 1.5% of units classified as overcrowded (more than 1 person per room) and 0.5% lacking complete kitchen or plumbing facilities
- A variety of housing types, with a higher percentage of multi-family dwellings than the County as a whole
- Expected continuation of population decline

[21] The four-factor analysis is detailed in the *Federal Register* dated January 22, 2007.

- Expected increase in new housing construction, as predicted by a building permit statistical model
- Market-rate rental stock that was determined to be generally affordable to all but extremely-low-income households

Based on these conditions, the Plan recommends the following policy actions related to housing:

- Apply CDBG funds and other resources to incentivize and facilitate housing maintenance
- Plan areas for new housing development to accommodate demand for new housing, and for the replacement of units requiring demolition; ensure that new single-family housing is compatible with surrounding neighborhoods, housing types and densities
- Permit new multi-family uses only when a developer can provide market-based evidence of the need for additional such units, and subject to conditional use approval in limited areas or districts, and with appropriate site improvement requirements
- Monitor median incomes and market rates for housing to ensure that it remains affordable, and assure that programs to assist extremely-low-income households are available and accessible
- Permit private development of senior housing subject to conditional-use approval in limited areas or districts and with appropriate site improvement requirements; re-evaluate the need for senior housing when the Plan is next updated
- Require high-quality development to the extent feasible via the adoption of residential design standards
- Consider the establishment of a local historic district and local reviewing body

The Plan identifies specific areas targeted for future growth by annexation and/or further development, including parcels in surrounding townships that are not agriculturally or environmentally sensitive and do not pose difficulty to the installation of infrastructure or provision of services. The City of Alliance covered 9.4 square miles at the time of the Plan's composition, with a build-out of 80.7%. Approximately 2,289 acres, or 49.2% of all City parcels, were classified as any type of residential. The Future Land Use Map envisions that 56.7% of the City's expanded land area (2,649 of 4,672 acres) would be single-family residential; 4.2% (197 acres) would be multi-family residential. This constitutes a substantial expected expansion of areas designated for single-family housing. The Plan does not specify the existing percentage of multi-family housing, but a comparison of current and future land use maps indicates that the City does not project corresponding growth in that housing type.

Observation

The Comprehensive Land Use Plan includes housing policies that discourage the development of new multi-family and senior units.

Based on the facts that Alliance has a higher rate of these unit types than the County average and that the existing rental stock is generally affordable, the Plan does not identify need for additional multi-family housing or senior housing. The policy actions recommended actively discourage the development of these types of potentially affordable housing by presenting barriers to their creation (requirement of a market study demonstrating need for multi-family units, additional site improvement requirements and stated limitation of areas for both types).

While it is true that Alliance already houses a number of renters above the County average – and that affordable housing should be available regionwide – policy positions to limit the development of multi-family units in particular will disproportionately impact members of the protected classes, who are more commonly in need of affordable housing.

vi. Zoning

In Ohio, the power behind land development decisions resides with municipal governments through the formulation and administration of local controls. These include comprehensive plans, zoning ordinances and subdivision ordinances, as well as building and occupancy permits.

The City of Alliance's Planning and Zoning Code, Part 11 of the City Code of Ordinances, was reviewed to identify potential impediments to fair housing choice. This analysis is based on the following five topics raised in HUD's Fair Housing Planning Guide, which include:

- The opportunity to develop various housing types, including apartments and housing at various densities
- The opportunity to develop alternative designs, such as cluster developments, planned residential developments, inclusionary zoning and transit-oriented developments
- Minimum lot size requirements
- Dispersal requirements and regulatory provisions for housing facilities for persons with disabilities (i.e. group homes) in single-family zoning districts
- Restrictions on the number of unrelated persons in dwelling units

a. Date of Ordinance

Generally speaking, the older a zoning ordinance, the less effective it will be. Older zoning ordinances have not evolved to address changing land uses, lifestyles, and demographics. However, the age of the zoning ordinance does not necessarily mean that the regulations impede housing choice by members of the protected classes.

The City of Alliance adopted its latest zoning regulations in March 2007. This edition replaced a previous ordinance that was more than 40 years old, updating terminology and land use strategy to facilitate the implementation of the 2004 Comprehensive Land Use Plan.

b. Residential Zoning Districts and Permitted Dwelling Types

The number of residential zoning districts is not as significant as the characteristics of each district, including permitted land uses, minimum lot sizes, and the range of permitted housing types. However, the number of residential zoning districts is indicative of the jurisdiction's desire to promote and provide a diverse housing stock for different types of households at a wide range of income levels.

The City of Alliance has two zoning districts specified for residential use – R-1, for single-family housing, and R-2, for multiple-family housing. R-1 exists to provide "a range of choices of single-family living environments" along with associated uses, such as educational, cultural and religious institutions, parks and playgrounds, and municipal facilities. Accessory apartments are conditional uses, and attached residential structures (such as duplexes, stacked flats, apartment buildings or townhouses) are prohibited. R-2 is intended to accommodate various types and sizes of medium- and high-density residential units to meet the needs of different age and family groups. The code notes that R-2 represents "no intent … to promote a district of lower quality or desirability than any other residential district, although a higher density of population and a greater variety of dwelling types are permitted." Duplexes are permitted in R-2 by right, while other multi-family structures and developments, such as apartment buildings, townhouses and stacked flats, are conditional uses.

It is not unusual for urbanized areas with older housing stocks and a minimal amount of available land to define a small number of districts. However, the way in which Alliance has apportioned land between its two districts raises fair housing concerns. The R-2 district is located, for functional purposes, along major streets and in areas served by public utilities and other urban facilities and services. The 2007 zoning map demonstrates that these areas are much smaller than the portion of land reserved for single-family dwellings, and that the supply of developable land in R-2 is extremely limited. This fact, in combination with the prohibition of any housing type but single-family dwellings in R-1, means that siting options for many types of affordable housing are restricted.

The code's special requirements for multi-family dwellings and apartments compound this limitation. Currently, no multiple-family development can be approved for any site in Alliance without the applicant first submitting a market study to the City demonstrating an existing need for such development. The market study may not count population outside the City or projected population growth within the City in its calculations. This stipulation expressly limits the development of multi-family housing in Alliance, "given the number of existing multiple-family dwellings in the City."

Finally, it is worth noting that mobile homes and manufactured homes are prohibited in all zoning districts, though manufactured home parks are conditionally acceptable in R-2. These dwelling types represent additional affordable housing options that are restricted in Alliance.

Observation

The development of affordable housing in Alliance is discouraged by several items in the zoning code, particularly the limited amount of land zoned for and available for the development of attached and multi-family dwellings and the City's requirement that an applicant seeking to develop multi-family housing must produce a market study that demonstrates sufficient existing demand.

These policies have the effect of limiting affordable housing options. Because members of the protected classes often have lower household incomes, a lack of affordable housing may impede housing choice by individuals and families protected under federal, state and local fair housing statutes.

c. Permitted Residential Lot Sizes

Excessively large lot sizes may deter development of affordable housing. A balance should be struck between areas with larger lots and those for smaller lots that will more easily support creation of affordable housing. Finally, the cost of land is an important factor in assessing affordable housing opportunities. Although small lot sizes of 10,000 square feet or less may be permitted, if the cost to acquire such a lot is prohibitively expensive, then new affordable housing opportunities may be severely limited, if not non-existent.

In Alliance, the minimum lot size in both residential districts is 8,400 square feet, with a minimum width of 60 feet. This is not considered excessive, relative to the development of affordable units. Notably, the maximum height of structures is two stories (35 feet) in R-1 and three stories (45 feet) in R-2. The Downtown Commercial District is the only area of the City in which buildings of four or more stories are permitted. Multiple-family dwellings are a conditional use in this district, as well as B-3 (mixed commercial) and B-4 (office service).

d. Alternative Design

Allowing alternative designs provides opportunities to expand the supply of affordable housing by reducing the cost of infrastructure spread out over a larger parcel of land. Alternative designs may also increase the economies of scale in site development, further supporting the development of lower cost housing. Alternative designs can promote other community development objectives, including agricultural preservation or protection of environmentally sensitive lands, while off-setting large lot zoning and supporting the development of varied residential types. However, in many communities, alternative design developments often include higher-priced homes. Consideration should be given to alternative design developments that seek to produce and preserve affordable housing options for working and lower income households.

The City of Alliance has two overlay districts, both of which accommodate alternative design. Both the Planned Residential Development (PRD) overlay and the Planned Unit Development (PUD) overlay provide a degree of flexibility in regard to land use and design regulations, though PUDs extend beyond residential uses to also include commercial, industrial and mixed uses. The overlays are intended to encourage innovative site design and a mixture of residential dwelling types or other land uses that would not normally be permitted in a particular zoning district.

e. Definition of Family

Local zoning and land use laws that treat groups of unrelated persons with disabilities less favorably than similar groups of unrelated persons without disabilities violate the Fair Housing Act. Restrictive definitions of family may impede unrelated individuals from sharing a dwelling unit. Defining family broadly advances non-traditional families and supports the blending of families who may be living together for economic purposes. Restrictions in the definition of family typically cap the number of unrelated individuals that can live together. These restrictions can impede the development of group homes, effectively restricting housing choice for persons with disabilities.

The City of Alliance defines a family as one or more persons related by blood, marriage or adoption living together in one residential unit and maintaining a common household, or not more than two unrelated persons living in such an arrangement. The ordinance specifies that certain arrangements do not violate the ordinance, such as a) pending adoption proceedings, b) persons residing in a household due to placement by federal, state or local agencies or regulations, c) foreign exchange students, and d) presence of a medical caregiver.

If the exception for persons placed in residences by federal, state or local agencies is applied in such a way that group homes for persons with disabilities – at any number of residents – may be considered single-family homes, this definition is sufficiently broad to achieve consistency with the federal Fair Housing Act. However, its cap of two persons in non-related households has the effect of limiting many modern housing arrangements, many of which are for economic purposes. A more ideal definition would not distinguish between unrelated and related persons.

f. Regulations for Group Homes for Persons with Disabilities

Group homes are residential uses that do not adversely impact a community. Efforts should be made to ensure group homes can be easily accommodated throughout the community under the same standards as any other residential use. Of particular concern are those that serve members of the protected classes such as the disabled. Because a group home for the disabled provides a non-institutional experience for its occupants, imposing special conditions is contrary to the purpose of a group home. More importantly, the restrictions, unless required of all residential uses in the zoning district, impede the creation of group homes and are in violation of the Fair Housing Act.

Two primary purposes of a group home residence are normalization and community integration. By allowing group residences throughout the community in agreement with the same standards as applied to all other residential uses occupied by a family, the purposes of the use are not hindered and housing choice for the disabled is not impeded. Toward this end, the imposition of distancing or separation requirements on group homes for persons with disabilities is a violation of the Fair Housing Act.

In Alliance, group homes for persons with disabilities fall into the use category of "State-Licensed Residential Facilities Not Listed." They are not permitted by right anywhere in the City. They are prohibited in R-1, which encompasses the majority of land, and qualify as a conditional use in R-2 and two business districts. Placing additional restrictions on group homes with disabilities represents an inconsistency with the Fair Housing Act.

Observation

Group homes for persons with disabilities are prohibited from locating in most residential areas of Alliance. In order to achieve consistency with the Fair Housing Act, the City should amend its ordinance to remove these restrictions.

D. Private Sector Policies

i. Mortgage Lending Practices

Under the terms of the Financial Institutions Reform, Recovery, and Enforcement Act of 1989 (F.I.R.R.E.A.), any commercial lending institution that makes five or more home mortgage loans must report all residential loan activity to the Federal Reserve Bank under the terms of the Home Mortgage Disclosure Act (HMDA). The HMDA regulations require most institutions involved in lending to comply and report information on loans denied, withdrawn, or incomplete by race, sex, and income of the applicant. The information from the HMDA statements assists in determining whether financial institutions are serving the housing needs of their communities. The data also helps to identify possible discriminatory lending practices and patterns.

The most recent HMDA data available for the City of Alliance is from 2007 to 2009. Reviewing this data helps to determine the need to encourage area lenders, other business lenders, and the community at large to actively promote existing programs and develop new programs to assist residents in securing home mortgage loans for home purchases. The data focus on the number of homeowner mortgage applications received by lenders for home purchase of one- to four-family dwellings and manufactured housing units in the City. The information provided is for the primary applicant only. Co-applicants were not included in the analysis. In addition, where no information is provided or categorized as not applicable, no analysis has been conducted due to lack of information. Figure 3-27 summarizes three years of HMDA data by race, ethnicity, and action taken on the applications, with detailed information to follow.

Figure 3-27
Summary Report Based on Action Taken Mortgage Data, 2007-2009

	2007		2008		2009	
	#	%	#	%	#	%
Mortgages applied for	**341**	**100.0%**	**274**	**100.0%**	**196**	**100.0%**
Blacks	8	2.3%	10	3.6%	3	1.5%
Whites	304	89.1%	252	92.0%	176	89.8%
Asians	3	0.9%	-	0.0%	1	0.5%
Hispanics*	2	0.6%	3	1.1%	-	0.0%
Other races	1	0.3%	-	0.0%	3	1.5%
No information/NA	25	7.3%	12	4.4%	13	6.6%
Mortgages originated	**230**	**67.4%**	**197**	**71.9%**	**135**	**68.9%**
Blacks	4	50.0%	8	80.0%	3	100.0%
Whites	214	70.4%	183	72.6%	121	68.8%
Asians	1	33.3%	-	N/A	1	100.0%
Hispanics*	2	100.0%	2	66.7%	-	N/A
Other races	-	0.0%	-	N/A	3	100.0%
No information/NA	11	44.0%	6	50.0%	7	53.8%
Mortgages denied	**60**	**17.6%**	**41**	**15.0%**	**33**	**16.8%**
Blacks	3	37.5%	1	10.0%	-	0.0%
Whites	47	15.5%	39	15.5%	31	17.6%
Asians	-	0.0%	-	N/A	-	0.0%
Hispanics*	-	0.0%	-	0.0%	-	N/A
Other races	1	100.0%	-	N/A	-	0.0%
No information/NA	9	36.0%	1	8.3%	2	15.4%

Note: Data is for home purchase loans for owner-occupied one-to-four family and manufactured units. Total applications do not include loans purchased by another institution. Other application outcomes include approved but not accepted, withdrawn and incomplete.
* Hispanic ethnicity is counted independently of race.
Source: Federal Financial Institutions Examination Council, 2007-09

The most obvious trend in 2007-09 HMDA data for Alliance is the steep drop in the number of loan applications during those years. This can be attributed primarily to stagnating home sales rates in the City that coincide with the national housing market crisis. The number of loan applications dropped by 67 (19.6%) from 2007 to 2008, then fell by an additional 78 (28.5%) in 2009. This is an overall drop of 145 applications or 42.5% over three years.

Applications from Black households, the second largest racial and ethnic minority group in Alliance, made up 2.3% (8 applications) of all applications in 2007, rose slightly to 10 applications in 2008, then fell to only 3 applications (1.5% of all applications) in 2009.

The number of successful loan applications fell by 95 (41.3%) over the same period. However, the total number of applications decreased at a similar rate, so the percentage loans that were successful remained generally constant, from 67.4% in 2007 to 68.9% in 2009.

The number of denials also fell along with applications and originations, decreasing by 27 (45.0%) from 2007 to 2009. Again, this is likely because of the sharp drop in applications as a whole.

The following section contains detailed analysis for applications filed in 2009, the latest for which information is available.

Figure 3-28
Summary Report Based on Action Taken Mortgage Data, 2009

	Total Applications*		Originated		Approved Not Accepted		Denied		Withdrawn/ Incomplete	
	#	%	#	%	#	%	#	%	#	%
Loan Type										
Conventional	84	42.9%	59	70.2%	5	6.0%	13	15.5%	7	8.3%
FHA	98	50.0%	66	67.3%	5	5.1%	17	17.3%	10	10.2%
VA	12	6.1%	10	83.3%	-	0.0%	1	8.3%	1	8.3%
FSA/RHS	2	1.0%	-	0.0%	-	0.0%	2	100.0%	-	0.0%
Loan Purpose: Home Purchase										
One to four-family unit	193	98.5%	135	69.9%	9	4.7%	32	16.6%	17	8.8%
Manufactured housing unit	3	1.5%	-	0.0%	1	33.3%	1	33.3%	1	33.3%
Applicant Race										
American Indian/Alaska Native	3	1.5%	3	100.0%	-	0.0%	-	0.0%	-	0.0%
Asian/Pacific Islander	1	0.5%	1	100.0%	-	0.0%	-	0.0%	-	0.0%
Hawaiian	-	0.0%	-	N/A	-	N/A	-	N/A	-	N/A
Black	3	1.5%	3	100.0%	-	0.0%	-	0.0%	-	0.0%
Hispanic**	-	0.0%	-	N/A	-	N/A	-	N/A	-	N/A
White	176	89.8%	121	68.8%	8	4.5%	31	17.6%	16	9.1%
No information	13	6.6%	7	53.8%	2	15.4%	2	15.4%	2	15.4%
Not applicable	-	0.0%	-	N/A	-	N/A	-	N/A	-	N/A
Applicant Sex										
Male	131	66.8%	88	67.2%	6	4.6%	24	18.3%	13	9.9%
Female	52	26.5%	39	75.0%	2	3.8%	7	13.5%	4	7.7%
No information	13	6.6%	8	61.5%	2	15.4%	2	15.4%	1	7.7%
Not applicable	-	0.0%	-	N/A	-	N/A	-	N/A	-	N/A
Total	196	100.0%	135	68.9%	10	5.1%	33	16.8%	18	9.2%

Source: Federal Financial Institutions Examination Council, 2009

Note: Percentages in the Approved, Approved Not Accepted, Denied, and Withdrawn/Incomplete categories are calculated for each line item with the corresponding Total Applications figures. Percentages in the Total Applications categories are calculated from

* Total applications do not include loans purchased by another institution.

** Hispanic ethnicity is counted independently of race.

a. Conventional Loans vs. Government-Backed Loans

Loan types in 2009 included conventional mortgage loans and a variety of government-backed loans, including FHA and VA. Comparing these loan types helps to determine if the less stringent underwriting standards and lower down payment requirements of government-backed loans expand home ownership opportunities. In Alliance, 57.1% (112) of households that applied for a mortgage loan applied for a government-backed loan. The denial rates for loan types were as follows:

- FHA loans: 17.3% (17 of 98 applications).
- VA-guaranteed loans: 8.3%. (1 of 12 applications).
- Conventional loans: 15.5% (13 of 84 applications).
- FSA/RHS loans: 100% (2 of 2 applications).

b. Denial of Applications

In 2009, the mortgage applications of 33 households in Alliance were denied (8.1%). Denial reasons were given for 29 applications and included the following:

- Credit history: 30.3%
- Debt-to-income ratio: 18.2%
- Credit Application Incomplete: 12.1%
- Collateral: 12.1%
- Unverifiable information: 6.1%
- Other: 6.1%
- Insufficient Cash: 3.0%

Observation

Poor credit and high debt-to-income ratios were the two main reasons for mortgage denials. Even in an area with relatively affordable housing, low-moderate income households may not be able to obtain a home mortgage for these reasons.

Figure 3-29
Denials by Race and Ethnicity, 2007-2009

	2007			2008			2009		
	Total Apps**	Denials	Denial Rate	Total Apps**	Denials	Denial Rate	Total Apps**	Denials	Denial Rate
Am. Indian/Alaska Native	1	1	100.0%	0	N/A	N/A	3	0	0.0%
Asian	3	0	0.0%	0	N/A	N/A	1	0	0.0%
Black	8	3	37.5%	10	1	10.0%	3	0	0.0%
Haw aiian	0	N/A	N/A	0	N/A	N/A	0	N/A	N/A
White	304	47	15.5%	252	39	15.5%	176	31	17.6%
Not Provided	25	9	36.0%	12	1	8.3%	13	2	15.4%
Hispanic*	2	0	0.0%	3	0	0.0%	0	N/A	N/A

* Hispanic ethnicity is counted independently of race.
**Total applications do not include loans purchased by another institution

In each year from 2007 to 2009 there are no more than 10 loan applications from any minority group in any year, and in some cases there were no applications. Given the extremely low application rate among minorities in Alliance, comparing denial rates between minority groups and/or from year-to-year is not a useful metric for measuring possible discrimination or barriers to fair housing choice.

For this analysis, lower-income households included those with incomes between 0%-80% of MFI, while upper-income households include households with incomes above 80% of MFI.

Lower-income households had a higher denial rate than upper-income households in each year from 2007 to 2009. Although lower-income households also had a higher number of applications in each of the three years, it is not proportional to the higher number of denials. In 2009 these households accounted for only 55.1% of all applications but 63.6% of all denials

Figure 3-30
Denials by Income, 2007-2009

	2007			2008			2009		
	Total Apps**	Denials	Denial Rate	Total Apps**	Denials	Denial Rate	Total Apps**	Denials	Denial Rate
Below 80% MFI	174	35	20.1%	149	30	20.1%	108	21	19.4%
At least 80% MFI	160	23	14.4%	124	11	8.9%	85	10	11.8%
Total	341	60	17.6%	274	41	15.0%	196	33	16.8%

Note: Total includes applications for w hich no income data w as reported
*Total applications do not include loans purchased by other institutions

Again, given the low number of loan applications from racial and ethnic minorities, there are too few applications to reliably make comparisons between different racial or ethnic groups and/or different income levels.

Figure 3-31
Denials by Race for Lower-income Applicants, 2007-2009

	2007			2008			2009		
	Total Apps**	Denials	Denial Rate	Total Apps**	Denials	Denial Rate	Total Apps**	Denials	Denial Rate
Am. Indian/Alaska Native	0	N/A	N/A	0	N/A	N/A	0	N/A	N/A
Asian	1	0	0.0%	0	N/A	N/A	0	N/A	N/A
Black	7	2	28.6%	5	1	20.0%	2	0	0.0%
Haw aiian	0	N/A	N/A	0	N/A	N/A	0	N/A	N/A
White	150	28	18.7%	138	29	21.0%	102	20	19.6%
Not Provided	16	5	31.3%	6	0	0.0%	4	1	25.0%
Hispanic**	1	0	0.0%	0	N/A	N/A	0	N/A	N/A
Total	174	35	20.1%	149	30	20.1%	108	21	19.4%

*Total applications do not include loans purchased by another institution
**Hispanic ethnicity is counted independently of race.

Among White households, the denial rate for lower-income applicants is higher than for upper-income applicants each year from 2007-2009. In 2007, it was 18.7% versus 11.6%; in 2008, 21.0% versus 8.8%; and in 2009, 19.6% versus 13.7%.

Figure 3-32
Denials by Race for Upper-income Applicants, 2007-2009

	2007			2008			2009		
	Total Apps**	Denials	Denial Rate	Total Apps**	Denials	Denial Rate	Total Apps**	Denials	Denial Rate
Am. Indian/Alaska Native	1	1	100.0%	0	N/A	N/A	3	0	0.0%
Asian	2	0	0.0%	0	N/A	N/A	1	0	0.0%
Black	1	1	100.0%	5	0	0.0%	1	0	0.0%
Hawaiian	0	N/A	N/A	0	N/A	N/A	0	N/A	N/A
White	147	17	11.6%	113	10	8.8%	73	10	13.7%
Not Provided	9	4	44.4%	6	1	16.7%	7	0	0.0%
Hispanic**	1	0	0.0%	3	0	0.0%	0	N/A	N/A
Total	160	23	14.4%	124	11	8.9%	85	10	11.8%

*Total applications do not include loans purchased by another institution
**Hispanic ethnicity is counted independently of race.

ii. High-Cost Lending Practices

The widespread housing finance market crisis of recent years has brought a new level of public attention to lending practices that victimize vulnerable populations. Subprime lending, designed for borrowers who are considered a credit risk, has increased the availability of credit to low-income persons. At the same time, subprime lending has often exploited borrowers, piling on excessive fees, penalties and interest rates that make financial stability difficult to achieve. Higher monthly mortgage payments make housing less affordable, increasing the risk of mortgage delinquency and foreclosure and the likelihood that properties will fall into disrepair.

Some subprime borrowers have credit scores, income levels and down payments high enough to qualify for conventional, prime loans, but are nonetheless steered toward more expensive subprime mortgages. This is especially true of minority groups, which tend to fall disproportionately into the category of subprime borrowers. The practice of targeting minorities for subprime lending qualifies as mortgage discrimination.

Since 2005, Housing Mortgage Disclosure Act data has included price information for loans priced above reporting thresholds set by the Federal Reserve Board. This data is provided by lenders via Loan Application Registers and can be aggregated to complete an analysis of loans by lender or for a specified geographic area. HMDA does not require lenders to report credit scores for applicants, so the data does not indicate which loans are subprime. It does, however, provide price information for loans considered "high-cost."

A loan is considered high-cost if it meets one of the following criteria:

- A first-lien loan with an interest rate at least three percentage points higher than the prevailing U.S. Treasury standard at the time the loan application was filed. The standard is equal to the current price of comparable-maturity Treasury securities.
- A second-lien loan with an interest rate at least five percentage points higher than the standard.

Not all loans carrying high APRs are subprime, and not all subprime loans carry high APRs. However, high-cost lending is a strong predictor of subprime lending, and it can also indicate a loan that applies a heavy cost burden on the borrower, increasing the risk of mortgage delinquency.

a. Home Purchase Loans

In 2009, there were 137 home purchase loans made for single-family or manufactured units in Alliance. Of this total, 134 disclosed the borrower's household income and 7 (5.2%) reported high-cost mortgages. For both lower- and upper-income households, high-cost loans decreased as a proportion of loan originations between 2007 and 2009. This could be due to policy changes that have limited subprime lending and/or to the necessity for lenders to make rates more competitive as the total number of applications dropped. Overall, lower-income households were more likely to have high-cost mortgages than upper-income households.

There were only three high-cost loans to minority applicants during the entire three-year period, likely because of the aforementioned low levels of applications and originations among minorities.

Figure 3-33
High-Cost Home Purchase Loans by Race/Ethnicity and Income, 2007-2009

		Lower Income			Upper Income		
		Total Originations	High-Cost	% High-Cost	Total Originations	High-Cost	% High-Cost
2007	Am. Indian/Alaska Native	0	N/A	N/A	0	N/A	N/A
	Asian	1	1	100.0%	0	N/A	N/A
	Black	4	2	50.0%	0	N/A	N/A
	Hawaiian	0	N/A	N/A	0	N/A	N/A
	White	107	23	21.5%	104	15	14.4%
	No information/NA	9	1	11.1%	2	1	50.0%
	Hispanic*	1	0	0.0%	1	0	0.0%
	Total	**121**	**27**	**22.3%**	**106**	**16**	**15.1%**
2008	Am. Indian/Alaska Native	0	N/A	N/A	0	N/A	N/A
	Asian	0	N/A	N/A	0	N/A	N/A
	Black	4	0	0.0%	4	0	0.0%
	Hawaiian	0	N/A	N/A	0	N/A	N/A
	White	93	21	22.6%	89	10	11.2%
	No information/NA	2	1	50.0%	4	1	25.0%
	Hispanic*	0	N/A	N/A	2	0	0.0%
	Total	**99**	**22**	**22.2%**	**97**	**11**	**11.3%**
2009	Am. Indian/Alaska Native	0	N/A	N/A	3	0	0.0%
	Asian	0	N/A	N/A	1	0	0.0%
	Black	2	0	0.0%	1	0	0.0%
	Hawaiian	0	N/A	N/A	0	N/A	N/A
	White	69	5	7.2%	52	2	3.8%
	No information/NA	2	0	0.0%	4	0	0.0%
	Hispanic*	0	N/A	N/A	0	N/A	N/A
	Total	**73**	**5**	**6.8%**	**61**	**2**	**3.3%**
Three-Year Totals		**293**	**54**	**18.4%**	**264**	**29**	**11.0%**

Note: Does not include loans for which no income data was reported: 3 in 2007, 1 in 2008 and 3 in 2009.
* Hispanic ethnicity is counted independently of race.

b. Refinancing Loans

This analysis also looks at high-cost lending among refinancing loans. A refinanced loan replaces an original mortgage and allows borrowers to take advantage of lower rates, switch from a variable to a fixed-rate mortgage, consolidate debt, and/or receive cash using the home's equity.

In Alliance in 2009, there were 279 refinancing loans and 242 for which income was reported. Of these, 33 (13.6%) were high-cost loans.

There are a number of similarities among home purchase and refinancing loans. First, lower-income households consistently had higher rates of high-cost loans across the reporting period. In 2009, the rate of high-cost loans among lower-income households was double that of upper-income households: 20.2% versus 10.1%. Next, the proportion of high-cost loans among originations decreased for both lower- and upper-income applicants across the three-year period. Finally, minorities represent an extremely small percentage of refinancing loan recipients, making any analysis by race or ethnicity unreliable.

Figure 3-34
High-Cost Refinancing Loans by Race/Ethnicity and Income, 2007-2009

		Lower Income			Upper Income		
		Total Originations	High-Cost	% High-Cost	Total Originations	High-Cost	% High-Cost
2007	Am. Indian/Alaska Native	0	N/A	N/A	2	1	50.0%
	Asian	0	N/A	N/A	0	N/A	N/A
	Black	15	7	46.7%	6	4	66.7%
	Hawaiian	0	N/A	N/A	0	N/A	N/A
	White	101	32	31.7%	146	30	20.5%
	No information/NA	8	5	62.5%	17	7	41.2%
	Hispanic*	0	N/A	N/A	0	N/A	N/A
	Total	**124**	**44**	**35.5%**	**171**	**42**	**24.6%**
2008	Am. Indian/Alaska Native	0	N/A	N/A	1	0	0.0%
	Asian	0	N/A	N/A	0	N/A	N/A
	Black	4	2	50.0%	3	2	66.7%
	Hawaiian	0	N/A	N/A	1	0	0.0%
	White	83	20	24.1%	109	17	15.6%
	No information/NA	3	1	33.3%	12	4	33.3%
	Hispanic*	0	N/A	N/A	2	0	0.0%
	Total	**90**	**23**	**25.6%**	**126**	**23**	**18.3%**
2009	Am. Indian/Alaska Native	1	0	0.0%	0	N/A	N/A
	Asian	1	0	0.0%	0	N/A	N/A
	Black	0	N/A	N/A	0	N/A	N/A
	Hawaiian	1	1	100.0%	1	0	0.0%
	White	77	15	19.5%	145	16	11.0%
	No information/NA	4	1	25.0%	12	0	0.0%
	Hispanic*	0	N/A	N/A	1	0	0.0%
	Total	**84**	**17**	**20.2%**	**158**	**16**	**10.1%**
Three-Year Totals		**298**	**84**	**28.2%**	**455**	**81**	**17.8%**

Note: Does not include loans for which no income data was reported: 9 in 2007, 11 in 2008 and 37 in 2009.
* Hispanic ethnicity is counted independently of race.

E. Assessment of Current Fair Housing Policies, Programs, and Activities

i. Progress since Previous AI

The City of Alliance continues to implement policies to ameliorate the impediments to fair housing choice identified in the 2002 AI, which was conducted by the Regional Housing Center in Columbus on a regional basis with the same consortium members. With the recognition that many fair housing efforts constitute a continuous endeavor, City staff members continue to provide educational workshops, educational literature and counseling services on fair housing to those in need. The City's goal, as stated in its 2009 Consolidated Annual Performance and Evaluation Report (CAPER) for submission to HUD, is to promote fair housing rights and fair housing choice to increase awareness of and eliminate discrimination.

Specifically, the City reported in 2009 that it had addressed individual impediments identified in the 2002 AI as follows:

- **Impediment:** Lack of knowledge regarding fair housing laws and enforcement.
  Proposed Action Step: Increase community awareness on fair housing laws through education. Provide training, counseling, publications, seminars, etc. to educate the public.
  Action Undertaken: The staff of the fair housing department made presentations for representatives and constituents of the following organizations, agencies, and committees: Stark County Association of Realtors, Alliance Towers, Governmental Law Seminar and the Stark County Regional Planning Commission members.

- **Impediment**: Insurance companies provide limited services or refuse to insure properties in older or less desirable neighborhoods, thereby limiting housing choice because of higher housing costs. In declining and older neighborhoods, some insurance companies refuse to insure properties, especially in predominantly minority neighborhoods.
  Proposed Action Step: Conduct testing where testers pose as prospective purchasers of homeowners insurance and seek to secure insurance for homes that they intend to purchase or already own.
  Action Undertaken: The City facilitated testing of this type, with testers posing as prospective purchasers looking to obtain homeowners insurance. The results were still being analyzed and evaluated as of the publication of the CAPER. This testing project is ongoing and more conclusive results were expected.

- **Impediment**: Instances of housing discrimination restrict housing choices of low- and moderate-income population and minorities.
  Proposed Action Step: Educate minorities regarding housing opportunities in non-traditional areas throughout the county. Increase community awareness on fair housing laws through training, counseling, publication, seminars, etc.
  Action Undertaken: The fair housing department accomplished this goal by the aforementioned presentations, trainings, daily counseling of clients, and by the distribution of literature and publications.

- **Impediment**: A large number of Section 8 recipients (especially families with children) find it difficult to obtain a landlord who will accept Section 8 certificates.
  Proposed Action Step: Continue, expand and assist the SMHA in their efforts to educate landlords about the Section 8 program.
  Action Undertaken: The staff counsels landlords who want to participate in the Section 8 program, then refers them to SMHA.

- **Impediment**: Developers and builders do not comply with the multi-family accessibility provisions of fair housing laws for new construction.
  Proposed Action Step: Educate the developers, builders and architects on the accessibility requirements in the Fair Housing Act for new multi-family construction. Conduct periodic field inspections during the building of these projects to see that accessibility standards are being met.
  Action Undertaken: A workshop is underway to educate developers, builders and architects. Afterward, periodic field inspections will be performed.

- **Impediment**: The conditions of existing housing in need of major repair limits housing choice.
  Proposed Action Step: The housing rehabilitation and home ownership programs are effective tools in providing needed funds to rehab aging housing stock and enable low- and moderate-income persons to become home owners. Continued support, encouragement, and referrals to the appropriate entity will assist those persons in need of rehab or home ownership assistance.
  Action Undertaken: Under the Neighborhood Stabilization Program, numerous foreclosed homes are being rehabilitated to give prospective home owners the opportunity to purchase at an affordable price. Current homeowners with units in need of repair are referred to the housing rehabilitation department.

- **Impediment**: Minorities tend not to purchase or rent outside of areas of racial concentration, and non-minorities do not pursue housing opportunities in neighborhoods that are predominantly minority, which limits housing choice. Minorities, as well as non-minorities, do not have the information or knowledge on purchasing and renting outside of their areas of racial concentrations.
  Proposed Action Step: Continue education through counseling, training and publications to inform people that they can live *anywhere* they can afford.
  Action Undertaken: The fair housing office continues to accomplish this goal by the aforementioned presentations, trainings, daily counseling, advertisements, and by the distribution of literature and publications. This is a continuous effort.

ii. Current Fair Housing Programs and Activities

The City of Alliance contracts with the Stark County Regional Planning Commission (SCRPC) to oversee its fair housing programs. SCRPC provides counseling on tenant-landlord rights and fair housing laws, processes and investigates discrimination claims, sponsors educational workshops and seminars, monitors discrimination compliance, and produces fair housing literature. The City distributes this literature to individuals, landlords, and organizations such as the Alliance Police Department, the Mayor's Office, and the Departments of Code Enforcement, Health, and Planning and Development.

The City maintains a booth to distribute fair housing materials and to answer questions at the annual Carnation Days in the Park festival.

As part of its contract, SCRPC is responsible for receiving and investigating fair housing complaints in Alliance, and the Commission will file complaints with HUD when necessary.

To increase affordable housing in Alliance, the City provides limited rental assistance to families and housing rehabilitation to LMI home owners. The City could enhance its record-keeping by mapping the location of CDBG and HOME assistance provided to households. Such mapping would enable the City to evaluate its efforts to affirmatively further fair housing choice.

F. General Fair Housing Observations

This section of the AI is a summary of general observations included in earlier sections of the report. General observations include the results of primary and secondary research that define the underlying conditions, trends, and context for fair housing planning in Alliance. These observations in and of themselves do not necessarily constitute impediments to fair housing choice. Rather, they establish a contextual framework for the impediments to fair housing choice that are presented in the following section of the AI.

i. Demographics and Income

a. **Minorities increased from 13.0% to 15.1% of the total population between 1990 and 2010.** Blacks remain the largest minority group. However, the fastest growing segments of the population have been Asian/Pacific Islanders and Hispanics, which grew 134.1% and 205.1%, respectively.

b. **No census tracts in the City of Alliance qualify as areas of racial or minority concentration**, though tracts 7102, 7104 and 7105 have proportions of Black residents significantly higher than the rest of the City. These tracts coincide with the City's targeted investment areas.

c. **Alliance is a moderately segregated city.** According to dissimilarity index data, 48% of Black persons would have to move to a different location in Alliance in order to achieve full integration.

d. **Blacks experienced poverty at twice the rate of Whites in Alliance in 2008.** The median household income for Blacks was lower than that of Whites in 2008. Blacks also had a poverty rate of 27.4% compared to 12.4% for Whites. Consequently, Black households will have a more difficult time finding affordable housing.

e. **Of the 26 census block groups within the City of Alliance, 12 qualify as areas of concentration of low and moderate income persons.**

f. **Persons with disabilities were more likely to live in poverty than persons without disabilities.** Among all persons with a disability in 2000, 19.3% lived in poverty compared to 16.2% of persons without disabilities.

g. **Female-headed households with children were more likely to live in poverty.** Female-headed households with children accounted for more than half of all families living in poverty. Consequently, securing affordable housing will be especially difficult for this segment of the population.

ii. Housing

a. **While the City of Alliance as a whole experienced a 7.7% increase in housing stock, individual neighborhoods grew at drastically different rates.** Tract 7102, one of the City's targeted investment areas, had 569 more housing units in 2009 than in 1990, a gain of 53%.

b. **Multi-family units are spread among all of the City's census tracts, but exist by the highest percentage in census tracts with the most minority residents.** In census tract 7104, multi-family units comprised over three-quarters of the housing stock.

c. **Between January 2007 and June 2008, Alliance had a foreclosure rate of 10.4%.** The census tract with the highest foreclosure rate, 17.2%, is noted as a higher-poverty area with many minority residents.

d. **Higher unemployment and lower household income among Blacks are reflected in lower home ownership rates when compared to Whites.** Among Black households, 51.7% were home owners, compared to 61.7% of White households.

e. **Black households were much more likely to live in larger families than White households.** Almost two-thirds of Black families had three or more persons compared to 54.4% of White families. However, only 30.7% of the rental housing stock contains three or more bedrooms compared to 75.6% of the owner housing stock.

f. **Alliance lost over 800 units renting for less than $500 between 2000 and 2008.** By comparison, units renting for more than $1,000 increased tenfold, from 22 to 261.

g. **Minimum-wage and single-income households cannot afford a housing unit renting for the HUD fair market rent in Alliance and Stark County.** Minorities and female-headed households will be disproportionately impacted because of their lower incomes. This conclusion contradicts the statement in the Comprehensive Land Use Plan that rental housing is generally affordable for all but extremely-low-income households and is perhaps a reflection of the economic downturn of recent years.

h. **Persons with disabilities receiving a monthly SSI check of $674 as their sole source of income cannot afford a one-bedroom unit renting at the fair market rate of $510.**

i. **Lower-income Black households experienced housing problems at greater rates than White households.** Among renter households, 57.2% of Blacks had housing problems compared to 53.8% of Whites. Similarly, among owner households, 43.3% of Blacks had housing problems compared to 32.0% of Whites.

G. Potential Impediments and Recommendations

i. Public Sector

a. Due to the arrangement by which entitlement funds are allocated in the City of Alliance and Stark County and the limited availability of resources, the City's ability to use entitlement funds to create new housing opportunities in non-impacted areas is somewhat limited.

The City applies the CDBG entitlement dollars under its direct control to the improvement of public infrastructure, housing stock and the quality of life in impacted neighborhoods. However, these activities do not create new housing opportunities for members of the protected classes in non-impacted areas. The City's commitment to affirmatively further fair housing requires that it take meaningful steps to expand opportunity for these groups.

Recommended Action Step: Continue to invest CDBG funds in ways that enhance and revitalize LMI areas and preserve and improve the existing housing stock.

Recommended Action Step: The City should revise its Consolidated Plan to specifically define areas of racial and ethnic concentration.

Recommended Action Step: Work closely with the Stark County Regional Planning Commission to identify new HOME affordable rental housing project sites outside of racially/ethnically concentrated areas.

b. There are an estimated 318 persons with limited English proficiency in Alliance, half of whom are native Spanish speakers. Among the Spanish-speaking population in the City, 47.4% speak English less than "very well." It is unclear whether this population has adequate access to City programs and services.

Recommended Action Step: The City should conduct the four-factor analysis outlined at www.lep.gov to determine the extent to which the translation of vital documents is necessary to assist persons with limited English proficiency (LEP) in accessing County programs and services. This action could be undertaken as a regional Consortium activity coordinated by SCRPC.

c. The City has not established an affirmative marketing policy.

Though the City typically does not apply CDBG resources to activities that would trigger compliance with affirmative marketing regulations, the City should adopt a general affirmative marketing policy for housing developments assisted by any City funds that contain five or more units. Outlining affirmative marketing requirements would clarify the City's policy stance on fair housing. It would also establish consistent procedure for any future CDBG or HOME activity affecting housing with five or more units.

Recommended Action Step: Draft and adopt an affirmative marketing policy per HUD regulations, including the following provisions:

- Methods for informing the public, owners and potential tenants about fair housing laws and the City's policies (for example, use of the Fair Housing logo or equal opportunity language)

- A description of what owners and/or the grantee will do to affirmatively market housing assisted with CDBG funds
- A description of what owners and/or the City will do to inform persons not likely to apply for housing without special outreach
- Maintenance of records to document actions taken to affirmatively market CDBG- and HOME-assisted units and to assess marketing effectiveness, and
- Description of how efforts will be assessed and what corrective actions will be taken when requirements are not met.

d. The City's appointed public boards relating to housing issues are not demographically representative of the community at large.

Of the 12 combined members of Alliance's Planning Commission and Zoning Board, 11 are White males. In appointing members of the public to serve on professionally oriented volunteer boards such as these, relevant expertise and experience is often the primary concern. However, providing representation of the community at large should also be a goal. Involving a wide variety of demographic types in housing-related decisions ensures that the City is better equipped to understand and serve the needs of these population groups.

Recommended Action Step: Recruit and involve qualified members of the protected classes in community leadership as it relates to housing issues. Alternately, the City could assemble an additional, more representative board to advise on housing-related policy matters in general.

e. The Comprehensive Land Use Plan and the City's zoning ordinance discourage the development of multi-family rental housing.

The development of affordable housing in Alliance is discouraged by several items in the zoning code, particularly the limited amount of land zoned for and available for the development of attached and multi-family dwellings and the City's requirement that an applicant seeking to develop multi-family housing must produce a market study that demonstrates sufficient existing demand.

In a parallel policy, the Comprehensive Land Use Plan does not identify need for additional multi-family housing or senior housing, due to the City's higher rate of these unit types than the County average and the observation that existing rental stock is generally affordable. The policy actions recommended actively discourage the development of these types of potentially affordable housing by presenting barriers to their creation (requirement of a market study demonstrating need for multi-family units, additional site improvement requirements and stated limitation of land areas for both types).

These policies have the effect of limiting affordable housing options. Because members of the protected classes often have lower household incomes, a lack of affordable housing may impede housing choice by individuals and families protected under federal, state and local fair housing statutes.

The demographic and economic analysis contained in this AI, based on more recent trends, demonstrates an unmet need for affordable units, especially among members of the protected classes.

Recommended Action Step: Initiate a review of the zoning ordinance and Comprehensive Land Use Plan with the goal of removing obstacles to the creation of affordable housing.

f. The zoning ordinance places undue restrictions on the location of group homes for persons with disabilities, a policy that is inconsistent with the provisions of the Fair Housing Act.

Two primary purposes of a group home residence are normalization and community integration. By allowing group residences throughout the community in agreement with the same standards as applied to all other residential uses occupied by a family, the purposes of the use are not hindered and housing choice for the disabled is not impeded. Toward this end, the imposition of distancing or separation requirements on group homes for persons with disabilities is a violation of the Fair Housing Act.

In Alliance, group homes for persons with disabilities fall into the use category of “State-Licensed Residential Facilities Not Listed.” They are not permitted by right anywhere in the City. They are prohibited in R-1, which encompasses the majority of land, and qualify as a conditional use in R-2 and two business districts.

Recommended Action Step: Amend the zoning ordinance to allow group homes for persons with disabilities to locate and function under the same rules that govern single-family dwelling units.

H. Fair Housing Action Plan

	Planned Action Year					Responsible Entity
	2012	2013	2014	2015	2016	
Amend policy and program documents to affirmatively further fair housing						
Amend the Consolidated Plan to include a definition for areas of minority concentration. Carry the definition through to Annual Plans.	•	•	•	•	•	
Draft and adopt an Affirmative Marketing Policy per HUD regulations for all housing developments of five or more units that are assisted by any City funds.	•					
Iniate a review of the zoning ordinance and Comprehensive Land Use Plan w ith the goal of removing obstacles to the creation of affordable housing, as identified in the AI.		•				
Amend the zoning ordinance to allow group homes for persons w ith disabilities to locate and function under the same rules that govern single-family dw elling units.		•				
Conduct the four-factor analysis outlined at w w w .lep.gov to determine the extent to w hich the translation of vital documents is necessary to assist persons w ith limited English proficiency in accessing County programs and services.	•					
Incorporate planning principles to expand the array of affordable housing options						
Continue to invest CDBG funds in w ays that enhance and revitalize LMI areas and improve the existing housing stock.	•	•	•	•	•	
Work closely w ith SCRPC to identify new HOME affordable rental housing project sites outside of racially/ethnically concentrated areas.	•	•	•	•	•	
Expand incentives for property ow ners and investors to build new apartment buildings or substantially rehabilitate existing buildings for occupancy by low er-income families.	•	•	•	•	•	
Increase community involvement and awareness of fair housing issues						
Recruit and involve qualified members of the protected classes in community leadership as it relates to housing issues. Alternately, the City could assemble an additional, more representative board to advise on matters related to housing policy.	•	•	•	•	•	
Continue to provide fair housing education and outreach efforts to landlords, building ow ners, rental agents, and Realtors	•	•	•	•	•	

I. Signature Page for the City of Alliance

By my signature I certify that the Analysis of Impediments to Fair Housing Choice for the City of Alliance is in compliance with the intent and directives of the regulations of the Community Development Block Grant Program and the HOME Investment Partnerships Program.

____

(Signature of Authorizing Official)

____

Date

4. City of Canton

A. Demographic Profile

i. Population Trends

Between 1990 and 2009, the total population in Canton decreased 6.4%. This loss was most significant in the White population, which decreased 14.2% from 67,890 residents to 58,270. The non-White population, on the other hand, increased 26.2%, from 16,271 residents to 20,529. In 2009, the non-White population represented 26.1% of the City's population, compared to 19.3% in 1990.

Figure 4-1
Population Trends, 1990-2009

	1990		2000		2009		% Change 1990-2010
	#	%	#	%	#	%	
Canton	**84,161**	**100.0%**	**80,806**	**100.0%**	**78,799**	**100.0%**	**-6.4%**
White Population	67,890	80.7%	60,164	74.5%	58,270	73.9%	-14.2%
Non-White Population	16,271	19.3%	20,642	25.5%	20,529	26.1%	26.2%
Black	15,325	18.2%	16,999	21.0%	16,585	21.0%	8.2%
Asian/Pacific Islander	267	0.3%	281	0.3%	174	0.2%	-34.8%
Amer. Indian/Alaska Native	429	0.5%	396	0.5%	413	0.5%	-3.7%
All Other Races	250	0.3%	492	0.6%	487	0.6%	94.8%
Two or More Races	-	-	2,474	3.1%	2,870	3.6%	16.0*
Hispanic	889	1.1%	1,006	1.2%	1,311	1.7%	47.5%

* Reflects change between 2000 and 2009. This category did not exist in the 1990 Census.

Source: U.S. Census Bureau, 2005-09 American Community Survey

Although Blacks continue to comprise the majority of non-White residents, diversity among non-White residents has been growing. Blacks accounted for 80.8% of the non-White population in 2009, compared to 94.2% in 1990. Persons of two or more races represent the second largest minority group, comprising 14% of the non-White population in 2009. Between 2000 and 2009, the multi-race population increased 16% from 2,474 to 2,870.

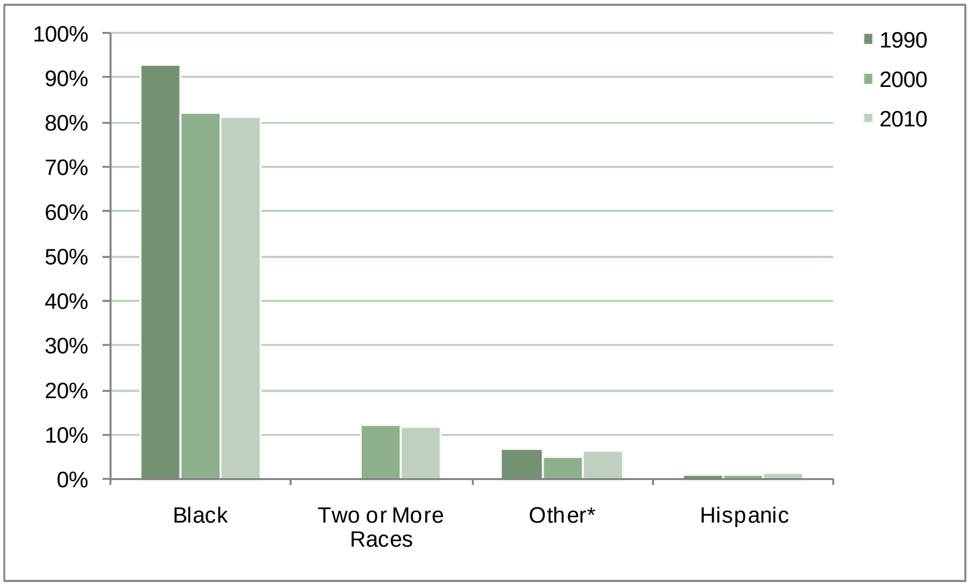
During the same period, the number of Hispanics in Canton increased 47.5% from 889 persons to 1,311. In 2009, Hispanics accounted for 1.7% of the City's total population.

Observation

Minorities increased from 19.3% to 26.1% of the total population between 1990 and 2009.

Blacks remain the largest minority group, Hispanics, multi-racial persons and persons of all other races represent a growing segment of the population.

Figure 4-2
Changes in the Racial and Ethnic Characteristics of the Minority Population, 1990-2010



*Other includes Alaska Natives/American Indians, Asian/Pacific Islanders and Persons of Some Other Race

ii. Areas of Racial and Ethnic Minority Concentration

The City's Five-Year Consolidated Plan does not establish a specific percentage threshold to define areas of racial or ethnic minority concentration. In the absence of numerical definitions for "area of racial or ethnic concentration" in consolidated planning documents for each of the Stark County Consortium jurisdictions, a generally accepted definition is applied throughout the AI: Concentrated geographical areas are those within a city where the percentage of a specific minority or ethnic group is 10 percentage points higher than in the city overall. To more accurately reflect the growing diversity among Canton's population, the City should amend its Five-Year Consolidated Plan to incorporate this definition of an area of racial or ethnic concentration.

In Canton, Blacks comprised 21% of the population in 2009. Therefore, an area of racial concentration would include any census tract where the percentage of Black residents is 31% or higher. Eight census tracts in Canton meet this criterion. These include tracts 7001, 7003, 7005, 7018, 7021, 7023, 7024 and 7031, which are highlighted in Figure 4-3. No other minority group meets this criterion.

Figure 4-4 depicts the geographic location of the areas of racial concentration. In Canton, the census tracts outlined in *red* are areas of concentration of Black residents, also referred to as impacted areas. It is within these impacted areas that other demographic characteristics—such as income and housing—will be analyzed. These areas are found primarily in southeast Canton, the historically Black neighborhoods of the City.

Observation

There are eight areas of minority concentration of Black residents in Canton.

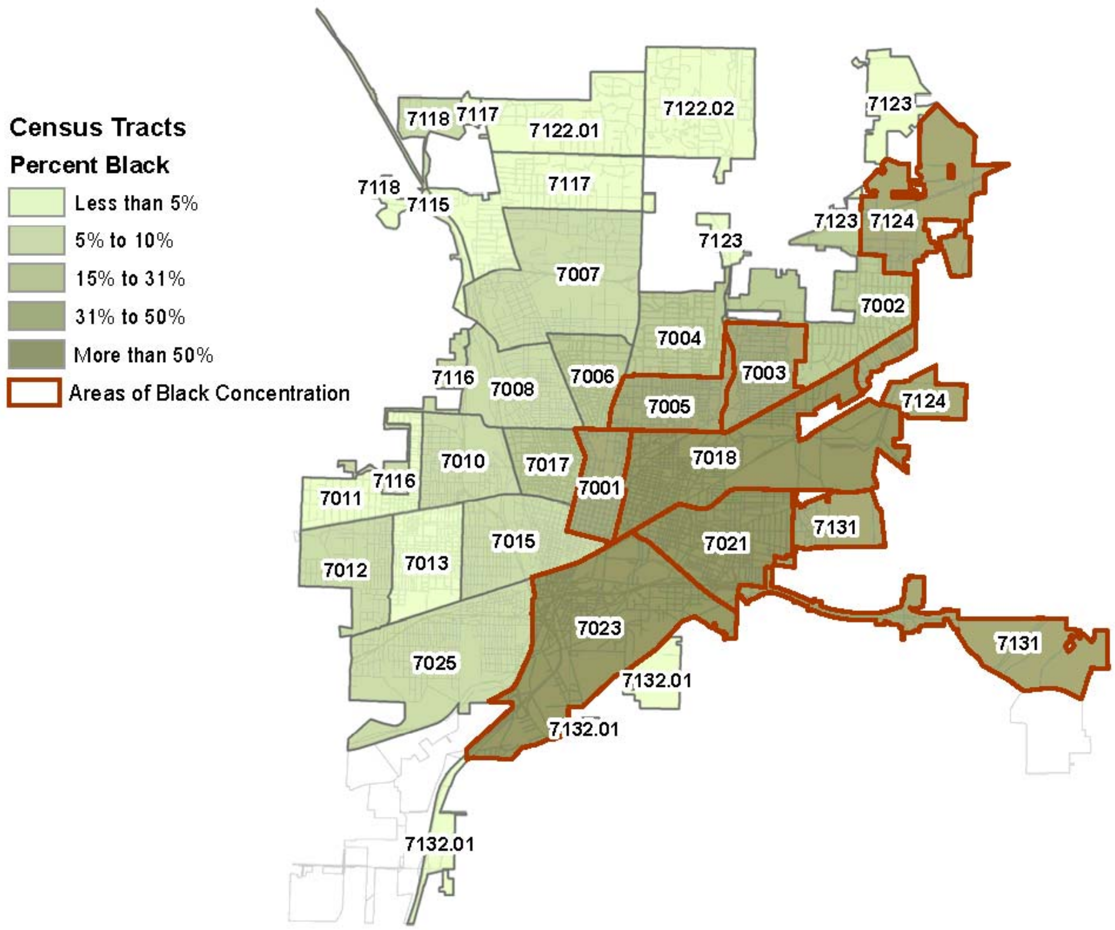
These include areas where the percentage of Blacks is 31% or higher, specifically tracts 7001, 7003, 7005, 7018, 7021, 7023, 7024 and 7031.

Figure 4-3
Census Tract Population by Race and Hispanic Origin, 2009

Census Tract	Total Population	White	Black	Asian	Hispanic
Canton	**78,785**	**73.9%**	**21.0%**	**0.2%**	**1.6%**
7001	1,279	63.0%	34.9%	0.0%	1.6%
7002*	4,625	68.0%	24.0%	0.0%	1.0%
7003	3,085	50.9%	39.9%	0.0%	2.7%
7004*	4,127	73.1%	25.0%	0.0%	0.2%
7005	3,886	54.4%	38.4%	0.0%	2.3%
7006	3,798	78.0%	18.2%	1.7%	0.2%
7007*	7,543	90.7%	6.4%	0.3%	2.4%
7008*	3,831	82.6%	13.4%	0.4%	2.7%
7010	4,009	88.0%	6.7%	0.0%	0.9%
7011	3,612	93.2%	4.9%	0.0%	0.9%
7012*	3,691	89.8%	6.6%	0.0%	4.0%
7013	4,465	86.0%	4.8%	0.0%	0.0%
7015	3,000	76.1%	13.9%	0.0%	0.0%
7017	3,353	67.5%	27.9%	0.0%	5.1%
7018*	2,592	41.2%	52.5%	0.0%	1.6%
7021*	3,891	27.1%	69.1%	0.0%	3.6%
7023*	3,128	39.2%	55.9%	0.0%	0.0%
7025*	3,540	89.9%	6.5%	0.7%	3.2%
7115*	138	100.0%	0.0%	0.0%	0.0%
7116*	283	90.1%	6.0%	0.0%	3.9%
7117*	4,196	92.4%	4.4%	0.0%	0.0%
7118*	631	85.1%	14.9%	0.0%	0.0%
7122.01*	1,491	94.6%	0.0%	3.0%	1.9%
7122.02*	2,297	95.6%	1.6%	0.0%	1.6%
7123*	197	100.0%	0.0%	0.0%	0.0%
7124*	1,660	44.1%	49.5%	0.0%	0.7%
7131*	292	6.8%	49.7%	0.0%	0.0%
7132.01*	145	100.0%	0.0%	0.0%	0.0%

**Data in starred census tracts reflects only the parts of the tracts within the City of Canton*
Source: U.S. Census Bureau

Figure 4-4
Areas of Concentration of Black Residents, 2009



iii. Residential Segregation Patterns

Residential segregation is a measure of the degree of separation of racial or ethnic groups living in a neighborhood or community. Typically, the pattern of residential segregation involves the existence of predominantly homogenous, White suburban communities and low-income minority inner-city neighborhoods. A potential impediment to fair housing is created where either latent factors, such as attitudes, or overt factors, such as real estate practices, limit the range of housing opportunities for minorities. A lack of racial or ethnic integration in a community creates other problems, such as reinforcing prejudicial attitudes and behaviors, narrowing opportunities for interaction, and reducing the degree to which community life is considered harmonious. Areas of extreme minority isolation often experience poverty and social problems at rates that are disproportionately high. Racial segregation has been linked to diminished employment prospects, poor educational attainment, increased infant and adult mortality rates and increased homicide rates.

The distribution of racial or ethnic groups across a geographic area can be analyzed using an index of dissimilarity. This method allows for comparisons between subpopulations, indicating how much one group is spatially separated from another within a community. The index of dissimilarity is rated on a scale from 0 to 100, in which a score of 0 corresponds to perfect integration and a score of 100 represents total segregation.[22] The index is typically interpreted as the percentage of the minority population (in this instance, the Black population) that would have to move in order for a community or neighborhood to achieve full integration. A dissimilarity index of less than 30 indicates a low degree of segregation, while values between 30 and 60 indicate moderate segregation, and values above 60 indicate high segregation.

Figure 4-5 details the dissimilarity indices for metropolitan areas throughout Ohio. With a dissimilarity index of 50.0, Canton ranks 22nd out of 56 municipalities. The data indicates that in order to achieve full integration among White and Black residents, 50% of Blacks would have to move to another area within Canton.

[22] The index of dissimilarity is a commonly used demographic tool for measuring inequality. For a given geographic area, the index is equal to **1/2 Σ ABS [(b/B)-(a/A)]**, where b is the subgroup population of a census tract, B is the total subgroup population in a city, a is the majority population of a census tract, and A is the total majority population in the city. ABS refers to the absolute value of the calculation that follows.

Figure 4-5
Ohio Municipal Dissimilarity Index Rankings, 2000

Rank	City	Black Population	White Population	Total Population	Dissimilarity Index
1	Garfield Heights	5,143	24,577	30,734	80.7
2	Cleveland	241,512	185,641	478,403	79.4
3	Dayton	71,291	87,487	166,179	78.3
4	Hamilton	4,562	53,386	60,690	68.7
5	Toledo	73,134	212,658	313,619	67.0
6	Barberton	1,482	25,662	27,899	65.9
7	Youngstown	35,440	40,100	82,026	64.2
8	Cincinnati	141,534	173,781	331,285	63.0
9	Akron	61,510	144,719	217,074	61.5
10	Columbus	172,750	475,897	711,470	61.0
11	Springfield	11832	50,663	65,358	60.6
12	Middletown	5,447	44,658	51,605	59.6
13	Massillon	2,934	27,422	31,325	56.6
14	Euclid	16,038	34,678	52,717	56.2
15	East Cleveland	25,291	1,219	27,217	55.6
20	Medina	687	23,607	25,139	51.0
21	Cleveland Heights	20,752	25,840	49,958	50.3
22	**Canton**	**16,875**	**59,653**	**80,806**	**50.0**
23	Cuyahoga Falls	918	47,102	49,374	48.6
24	Marion	2,465	31,658	35,318	48.4
25	Alliance	2,287	20,099	23,458	48.0
52	Strongsville	533	40,929	43,858	23.8
53	Beavercreek	537	35,190	37,984	21.1
54	Gahanna	2,636	27,966	32,636	19.5
55	Dublin	527	27,901	31,392	18.8
56	Huber Heights	3,703	32,075	38,212	18.6

Source: CensusScope

Observation

Canton is a moderately segregated city.

According to dissimilarity index data, 50% of Black persons would have to move to a different location in Canton in order to achieve full integration.

Dissimilarity index data for all Canton subpopulations appears in the table below. The indices show that, in addition to a White/Black index of 50.0, Canton has a White/multi-race index of 29.2 and a White/Hispanic index of 25.4. These numbers indicate that these subpopulations are more integrated than Whites and Blacks in Canton. Perfect integration would receive an index score of 0. Indices for the other groups cannot be as reliably interpreted, since their populations are less than 1,000.

In cases where a subgroup population is small, the dissimilarity index may be high even if the group's members are evenly dispersed.

Figure 4-6
Canton Dissimilarity Indices, 2000

	DI with White Population**	Population	% of Total Population
White	-	59,653	73.8%
Black	**50.0**	**16,875**	**20.9%**
American Indian/Alaska Native*	38.5	373	0.5%
Asian*	37.3	253	0.3%
Hawaiian*	81.7	18	0.0%
Other*	44.0	299	40.0%
Two or more races	**29.2**	**2,329**	**2.9%**
Hispanic* **	**25.4**	**1,006**	**1.2%**
TOTAL	-	80,806	100.0%

** In these cases, sample size is too small to reliably interpret the DI. Caution should be exercised in interpreting results for subpopulations of fewer than 1,000.*
*** Each dissimilarity index indicates the percentage of one of the two population groups compared that would have to move to different geographic locations (i.e., block groups) to create a completely even demographic distribution in the City.*
**** Hispanic ethnicity is counted independently of race*
Source: CensusScope

iv. Race/Ethnicity and Income

Household income is one of several factors used to determine a household's eligibility for a home mortgage loan or a rental lease. In Canton, there are significant differences in earnings among the races and ethnicities. Median household income (MHI) for Whites, Asians and Hispanics in Canton was significantly higher than for Blacks. MHI for Black households was $17,194, compared to an MHI of $34,156 for Whites, $34,447 for Asians and $36,147 for Hispanics. Blacks and Hispanics also experienced poverty at higher rates than Whites. As shown in Figure 4-7, the poverty rates among Blacks and Hispanics were more than double the poverty rates for Whites and Asians in 2000. In 2008, almost half of Blacks (46.7%) lived in poverty compared to 18.0% of Whites.

Figure 4-7
Median Household Income and Poverty Rates by Race/Ethnicity, 2008

	Median Household Income, 2008	Poverty Rate 2000	Poverty Rate 2008
Canton City	**$28,679**	**19.2%**	**25.5%**
Whites	$34,156	14.8%	18.0%
Blacks	$17,194	32.4%	46.7%
Asians	$34,447	14.6%	--
Hispanics	$36,147	26.9%	--

2008 poverty rates for Asians and Hispanics were not available, due to small sample size

Source: U.S. Census Bureau, 2000 (SF3-P53, P159) 2006-2008 American Community Survey Three-Year Estimates (B19013, B19013A, B19013B, B19013D, B19013I & B17001, B17001A, B17001B, B17001D, B17001F, B17001I)

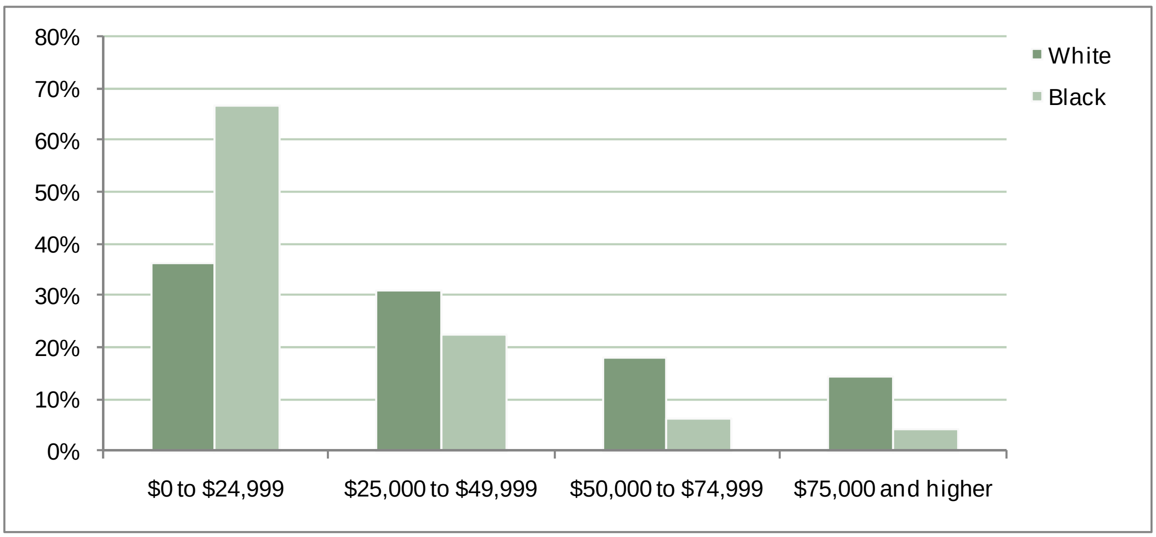
Distribution of household income by race and ethnicity is comparable to the trends described above. Two-thirds of Black households earned less than $25,000 in 2008 compared to one-third of White households. Whites also were more likely to fall into the highest income bracket. Among White households, 14.5% earned more than $75,000 annually compared to only 4.5% of Black households.

Figure 4-8
Household Income Distribution by Race and Ethnicity, 2008

	Total Households	$0 to $24,999		$25,000 to $49,999		$50,000 to $74,999		$75,000 and higher	
		#	%	#	%	#	%	#	%
Canton City	**30,863**	**13,577**	**44.0%**	**8,922**	**28.9%**	**4,693**	**15.2%**	**3,671**	**11.9%**
White	22,537	8,170	36.3%	6,974	30.9%	4,125	18.3%	3,268	14.5%
Black	7,107	4,741	66.7%	1,602	22.5%	442	6.2%	322	4.5%

Source: U.S. Census Bureau, 2006-2008 American Community Survey (C19001, B19001A, B19001B, B19001I).

Figure 4-9
Household Income Distribution by Race and Ethnicity, 2008



Observation

Blacks and Hispanics experienced poverty at twice the rate of Whites in Canton in 2000.

In 2000, Blacks and Hispanics had poverty rates of 32.4% and 26.9%, respectively, compared to 14.8% for Whites. In 2008, median household income for Blacks was half of that for Whites, and almost one-half of Blacks were living in poverty. Consequently, Black households will have a more difficult time finding and sustaining affordable housing.

v. Concentrations of LMI Persons

The CDBG program includes a statutory requirement that at least 70% of funds invested benefit low and moderate income (LMI) persons. As a result, HUD provides the percentage of LMI persons in each census block group for entitlements such as Canton. HUD data on the percent of LMI persons reveal that there are 38 census block groups where more than 51% of residents meet the criteria for LMI status, as highlighted in Figure 4-10. Of these, 15 were located within areas previously identified as areas of minority concentration. Figure 4-11 on the following page illustrates the location of areas of racial concentrations and LMI persons in Canton.

Observation

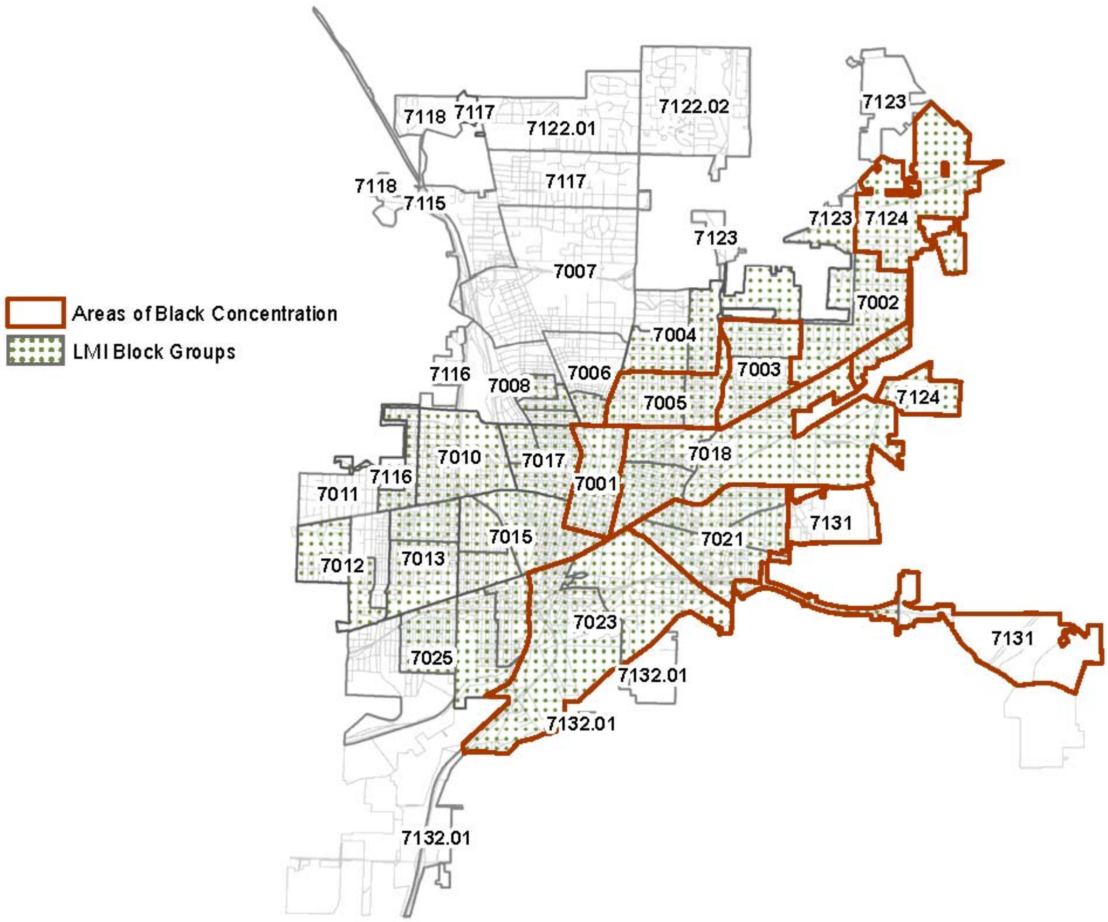
Of the 38 low and moderate income census block groups in Canton, 15 are located within impacted areas of Black residents. These are referred to as impacted areas.

Figure 4-10
Low and Moderate Income Persons, 2010

Census Tract	Block Group	Low/Moderate Income Persons		
		#	Universe	%
700100	5	805	978	82.3%
700200	4	656	918	71.5%
700200	5	2,261	3,800	59.5%
700300	4	1,181	1,952	60.5%
700300	6	731	1,105	66.2%
700400	2	727	1,371	53.0%
700400	4	948	1,639	57.8%
700400	5	347	1,141	30.4%
700500	1	688	1,014	67.9%
700500	4	1743	2616	66.6%
700600	1	381	1,236	30.8%
700600	2	630	1,242	50.7%
700600	3	517	854	60.5%
700700	1	875	2,636	33.2%
700700	2	275	888	31.0%
700700	3	364	904	40.3%
700700	4	649	1,277	50.8%
700800	1	1,054	2,175	48.5%
700800	2	486	938	51.8%
700800	3	391	643	60.8%
700800	4	415	645	64.3%
701000	1	2,189	4,007	0.0%
701100	1	474	836	0.0%
701100	2	655	966	0.0%
701100	3	253	873	29.0%
701100	4	273	824	33.1%
701200	1	291	815	35.7%
701200	2	417	880	47.4%
701200	3	725	1,127	64.3%
701200	4	525	907	57.9%
701300	1	1,029	1,714	60.0%
701300	2	1,536	2,813	54.6%
701500	1	985	1,179	83.5%
701500	2	477	884	54.0%
701500	3	1,048	1,520	68.9%
701700	1	717	1,292	55.5%
701700	2	2,227	3,074	72.4%
701800	1	1,035	1,330	77.8%
701800	2	1,005	1,268	79.3%
701800	3	470	733	64.1%
702100	1	769	1,361	56.5%
702100	2	1,215	1,591	76.4%
702100	3	809	1,278	63.3%
702300	1	1,439	1,760	81.8%
702300	2	1,069	1,124	95.1%
702500	1	913	1,387	65.8%
702500	2	231	502	46.0%
702500	3	879	1,111	79.1%
702500	4	453	745	60.8%
711500	1	0	0	0.0%
711500	2	0	12	0.0%
711600	3	0	0	0.0%
711600	4	23	23	100.0%
711600	5	141	222	63.5%
711700	1	118	969	12.2%
711700	2	591	1,462	40.4%
711700	3	300	742	40.4%
711700	4	338	846	40.0%
711700	6	59	59	100.0%
711800	4	183	658	27.8%
712201	2	576	1,933	29.8%
712202	2	59	447	13.2%
712202	3	186	1,239	15.0%
712300	6	11	112	9.8%
712400	9	1,018	1,233	82.6%
713100	3	104	142	73.2%
713100	4	20	113	17.7%
713201	9	0	0	0.0%
713201	1	0	0	0.0%

Source: U.S. Department of Housing & Urban Development, 2010

Figure 4-11
Map: Distribution of Low and Moderate Income Persons, 2010



vi. Disability and Income

As defined by the Census Bureau, a disability is a long-lasting physical, mental, or emotional condition that can make it difficult for a person to do activities such as walking, climbing stairs, dressing, bathing, learning, or remembering. This condition can also impede a person from being able to go outside the home alone or to work at a job or business.

The Fair Housing Act prohibits discrimination based on physical, mental or emotional handicap, provided "reasonable accommodation" can be made. Reasonable accommodation may include changes to address the needs of disabled persons, including adaptive structural (e.g., constructing an entrance ramp) or administrative changes (e.g., permitting the use of a service animal). In Canton, 22.1% of the population 5 years and older reported at least on type of disability in 2000.[23]

According to the National Organization on Disabilities, a significant income gap exists for persons with disabilities, given their lower rate of employment. In Canton, persons with disabilities are much more likely than persons without disabilities to live

[23] U.S. Census Bureau, Census 2000 (SF3, P42)

in poverty. In 2000, 25.2% of persons with disabilities lived in poverty compared to 15.8% of persons without disabilities who were living in poverty.[24]

Observation

Persons with disabilities were more likely to live in poverty than persons without disabilities.

Among all persons with a disability in 2000, 25.2% lived in poverty, compared to 15.8% of persons without disabilities.

vii. Familial Status and Income

The Census Bureau divides households into family and non-family households. Family households are married couple families with or without children, single-parent families and other families made up of related persons. Non-family households are either single persons living alone, or two or more non-related persons living together.

Women have protection under Title VIII of the Civil Rights act of 1968 against discrimination in housing. Protection for families with children was added in the 1988 amendments to Title VIII. Except in limited circumstances involving elderly housing and owner-occupied buildings of one to four units, it is unlawful to refuse to rent or sell to families with children.

The total number of households decreased from 1990 to 2008, mirroring the population loss of the period. However, the number of female-headed households increased during this period and comprised 21.3% of all households in 2008, and the number of single females raising children increased 41.3%. Female-headed households with children comprised 15.1% of all households in 2008 compared to 9.8% in 1990. The number of male-headed households with children also almost doubled during this period and accounted for 3.3% of households in 2008.

Married-couple households with children, on the other hand, decreased 45.4% between 1990 and 2008.

[24] U.S. Census Bureau, Census 2000 (SF3, PCT34)

Figure 4-12
Female-headed Households and Households with Children, 1990-2008

	1990		2000		2008	
	#	%	#	%	#	%
Total Households	**33,489**	**100.0%**	**32,564**	**100.0%**	**30,863**	**100.0%**
Family Households	21,789	65.1%	19,895	61.1%	17,864	57.9%
Married-couple family	15,068	45.0%	12,536	38.5%	9,456	30.6%
With Children	6,730	20.1%	5,359	16.5%	3,676	11.9%
Without Children	8,338	24.9%	7,177	22.0%	5,780	18.7%
Female-Headed Households	**5,503**	**16.4%**	**5,851**	**18.0%**	**6,566**	**21.3%**
With Children	**3,296**	**9.8%**	**3,661**	**11.2%**	**4,658**	**15.1%**
Without Children	2,207	6.6%	2,190	6.7%	1,908	6.2%
Male-Headed Household	1,218	3.6%	1,508	4.6%	1,842	6.0%
With Children	542	1.6%	830	2.5%	1,013	3.3%
Without Children	676	2.0%	678	2.1%	829	2.7%
Non-family and 1-person Households	11,700	34.9%	12,669	38.9%	12,999	42.1%

Sources: U.S. Census Bureau, 1990 (SFT-3, P019), Census 2000 (SF-3, P10); 2008 American Community Survey (B11001, B11003)

Female-headed households with children often experience difficulty in obtaining housing, primarily as a result of lower-incomes and the unwillingness of some landlords to rent their units to families with children. In Canton, female-headed households with children accounted for two-thirds of families living in poverty in 2000, although they comprised only one-fifth of families.[25] Almost half (48.6%) of all female-headed households with children lived in poverty, compared to 18.9% of male-headed households with children and only 6.6% of married-couple families with children.

Observation

Female-headed households with children were more likely to live in poverty.

Female-headed households with children accounted for more two-thirds of all families living in poverty and were more likely to live in poverty than married-couple and male-headed households with children. Consequently, securing affordable housing will be especially difficult for this segment of the population.

viii. Ancestry and Income

It is illegal to refuse the right to housing based on place of birth or ancestry. Census data on native and foreign-born populations in Canton revealed that in 2008, 1.9% of residents were foreign-born.[26]

Among families with one or more foreign-born parents, 43.0% were living in households with incomes of less than 200% of the poverty level. Comparatively,

[25] U.S. Census Bureau, Census 2000 (SF3, P90)
[26] U.S. Census Bureau, 2006-2008 American Community Survey (C05002)

65.4% of families with only native parents were living in households with incomes below 200% of the poverty level.[27]

Persons with limited English proficiency (LEP) are defined by the federal government as persons who have a limited ability to read, write, speak or understand English. HUD issued its guidelines on how to address the needs of persons with LEP in January 2007. HUD uses the prevalence of persons with LEP to identify the potential for impediments to fair housing choice due to their inability to comprehend English. Persons with LEP may encounter obstacles to fair housing by virtue of language and cultural barriers within their new environment. To assist these individuals, it is important that a community recognizes their presence and the potential for discrimination, whether intentional or inadvertent, and establishes policies to eliminate barriers. It is also incumbent upon HUD entitlement communities to determine the need for language assistance and comply with Title VI of the Civil Rights Act of 1964. The Census data below indicates that some limited-English residents may face barriers to accessing City programs and services.[28]

Observation

American Community Survey (ACS) data reports on the non-English language spoken at home for the population five years and older. In 2009, the ACS data reported that 729 persons in Canton spoke English less than "very well." Of these, 49.2% were native Spanish-speakers.

ix. Protected Class Status and Unemployment

Blacks were more likely to be unemployed than White residents in Canton. In 2008, unemployment in Canton in 2008 was 12.7%, which was considerably higher than Ohio's rate of 7.0%, and Stark County's rate of 7.1%. Within the City, Blacks had an unemployment rate of 24.6%, almost three times that of Whites (9.0%). Sample sizes of all other minority groups were too small to be included in the Census data.

[27] U.S. Census Bureau, 2006-2008 American Community Survey (C05010)
[28] U.S. Census Bureau, 2005-2009 American Community Survey (B16001)

Figure 4-13
Civilian Labor Force, 2008

Civilian Labor Force	Ohio		Stark County		Canton City	
	Total	%	Total	%	Total	%
Total CLF	**5,906,242**	**100%**	**196,756**	**100%**	**36,256**	**100%**
Employed	5,490,147	93.0%	182,735	92.9%	31,641	87.3%
Unemployed	416,095	7.0%	14,021	7.1%	4,615	12.7%
Male CLF	**3,079,988**	**100.0%**	**101,088**	**100.0%**	**18,006**	**100.0%**
Employed	2,853,623	92.7%	93,260	92.3%	15,436	85.7%
Unemployed	226,365	7.3%	7,828	7.7%	2,570	14.3%
Female CLF	**2,826,254**	**100.0%**	**95,668**	**100.0%**	**18,250**	**100.0%**
Employed	2,636,524	93.3%	89,475	93.5%	16,205	88.8%
Unemployed	189,730	6.7%	6,193	6.5%	2,045	11.2%
White CLF	**5,071,905**	**100%**	**101,150**	**100.0%**	**27,481**	**100.0%**
Employed	4,766,453	94.0%	90,089	89.1%	25,013	91.0%
Unemployed	305,452	6.0%	11,061	10.9%	2,468	9.0%
Black CLF	**619,629**	**100.0%**	**12,343**	**100.0%**	**7,034**	**100.0%**
Employed	526,938	85.0%	9,926	80.4%	5,306	75.4%
Unemployed	92,691	15.0%	2,417	19.6%	1,728	24.6%

Source: U.S. Census Bureau, 2006-2008 American Community Survey (C23001, C23002A, C23002B)

Observation

Blacks were almost three times as likely to be unemployed as Whites in 2008.

One-quarter of Blacks were unemployed in 2008 compared to 9% of Whites. Higher unemployment, whether temporary or permanent, will mean less disposable income for housing expenses.

B. Housing Market

i. Housing Inventory

In Canton, the total housing stock increased 3.4% from 36,527 to 37,779 units between 1990 and 2009. Ten census tracts within the City lost units during this period; two of these were areas of minority concentration. A total of 200 units were gained within the areas of concentration in Canton, representing an increase of 2.3%.

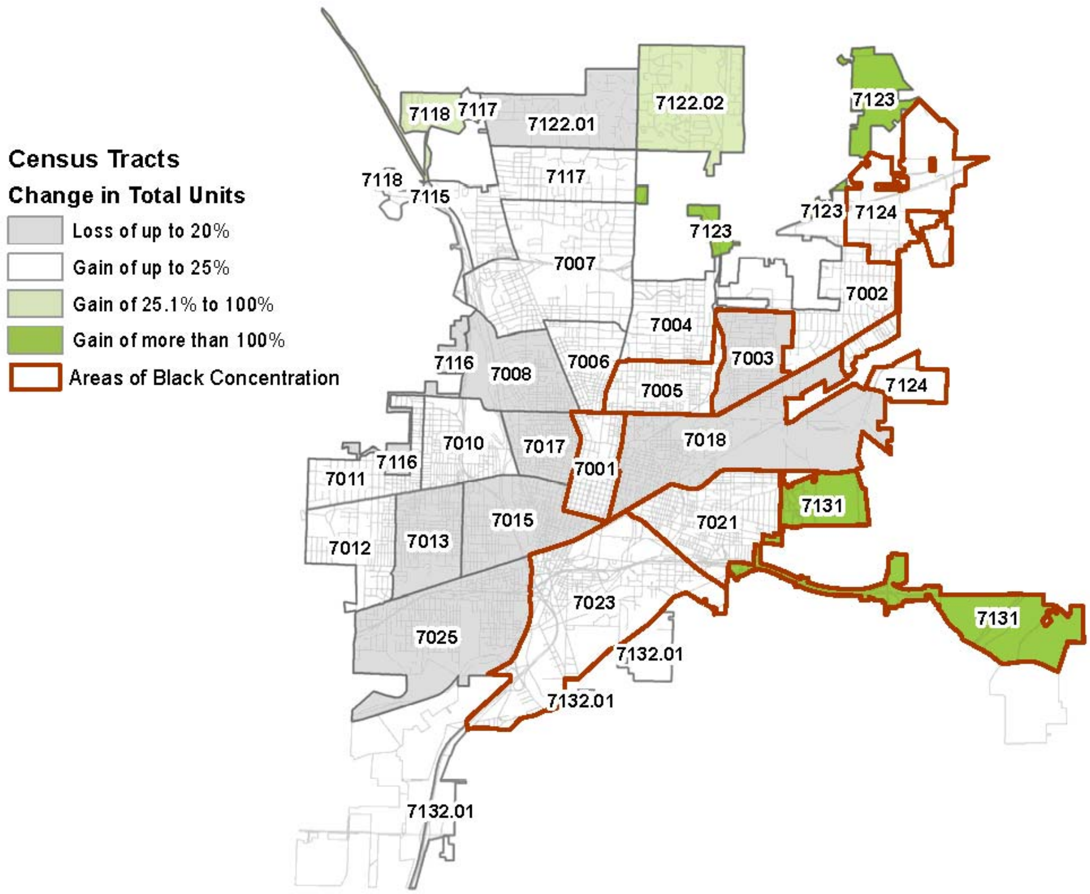
Areas of minority concentration are highlighted in Figures 4-14 and 4-15 to compare impacted areas with trends in housing development since 1990.

Figure 4-14
Trends in Total Housing Units, 1990-2009

Census Tract	1990		2000		2009		Change 1990-2009	
	#	% of Total Housing Units	#	% of Total Housing Units	#	% of Total Housing Units	#	% of Total Housing Units
Canton	**36,527**	**100.0%**	**35,477**	**100.0%**	**37,779**	**100.0%**	**1,252**	**3.4%**
7001	862	2.4%	705	2.0%	894	2.4%	32	3.7%
7002*	1,866	5.1%	1,922	5.4%	2,060	5.5%	194	10.4%
7003	1,258	3.4%	1,238	3.5%	1,256	3.3%	-2	-0.2%
7004*	1,887	5.2%	1,908	5.4%	2,053	5.4%	166	8.8%
7005	1,531	4.2%	1,492	4.2%	1,581	4.2%	50	3.3%
7006	1,708	4.7%	1,692	4.8%	1,808	4.8%	100	5.9%
7007*	2,934	8.0%	2,926	8.2%	3,095	8.2%	161	5.5%
7008*	2,157	5.9%	2,068	5.8%	2,126	5.6%	-31	-1.4%
7010	1,769	4.8%	1,677	4.7%	1,776	4.7%	7	0.4%
7011	1,603	4.4%	1,583	4.5%	1,699	4.5%	96	6.0%
7012*	1,690	4.6%	1,751	4.9%	1,896	5.0%	206	12.2%
7013	2,090	5.7%	1,973	5.6%	1,883	5.0%	-207	-9.9%
7015	1,797	4.9%	1,668	4.7%	1,735	4.6%	-62	-3.5%
7017	2,253	6.2%	2,033	5.7%	1,911	5.1%	-342	-15.2%
7018*	1,650	4.5%	1,475	4.2%	1,466	3.9%	-184	-11.2%
7021*	2,068	5.7%	1,911	5.4%	2,103	5.6%	35	1.7%
7023*	1,353	3.7%	1,316	3.7%	1,621	4.3%	268	19.8%
7025*	1,706	4.7%	1,597	4.5%	1,673	4.4%	-33	-1.9%
7115*	0	0.0%	9	0.0%	34	0.1%	34	---
7116*	115	0.3%	115	0.3%	92	0.2%	-23	-20.0%
7117*	1,856	5.1%	1,869	5.3%	1,927	5.1%	71	3.8%
7118*	346	0.9%	325	0.9%	434	1.1%	88	25.4%
7122.01*	842	2.3%	835	2.4%	746	2.0%	-96	-11.4%
7122.02*	553	1.5%	729	2.1%	977	2.6%	424	76.7%
7123*	60	0.2%	86	0.2%	122	0.3%	62	103.3%
7124*	517	1.4%	473	1.3%	618	1.6%	101	19.5%
7131*	56	0.2%	101	0.3%	157	0.4%	101	180.4%
7132.01*	0	0.0%	0	0.0%	36	0.1%	36	---

Note: Green shading denotes impacted tracts.
Data in starred census tracts reflects only the parts of the tracts within the City of Canton
Source: U.S. Census Bureau

Figure 4-15
Map: Change in Total Units by Census Tract, 1990-2009



ii. Types of Housing Units

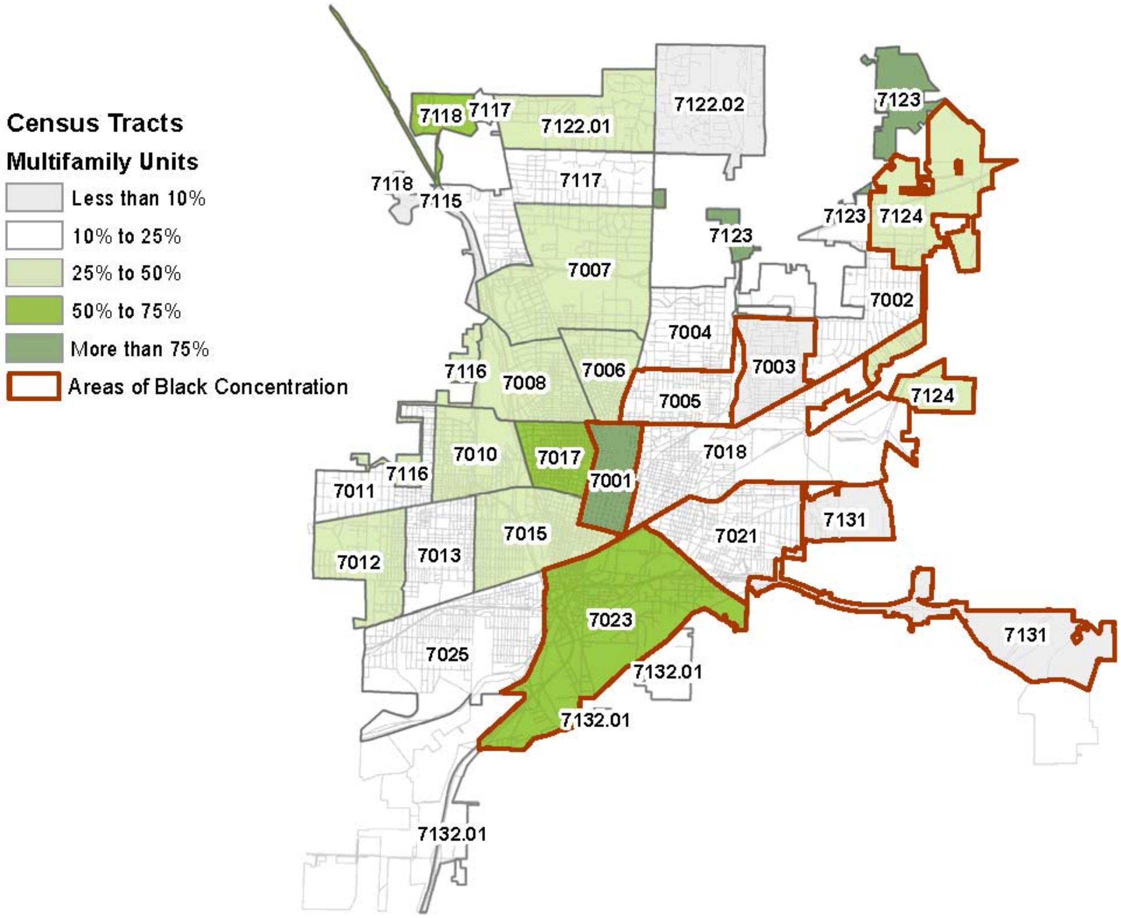
Single-family units comprised 70.0% of the housing stock in Canton in 2000, and multi-family units comprised 29.8% of all units. In the eight areas of racial concentration, multi-family structures accounted for 29.2% of a total 8,711 housing units. This is consistent with the citywide rate.

Figure 4-16
Trends in Housing Units in Structures, 2000

Census Tract	Total Units	Single-family units	Multi-family units: 2 to 4	5 to 9	10 to 19	20 or more	Total	Mobile Homes
Canton City	**35,477**	**24,818**	**5,652**	**1,660**	**1,472**	**1,796**	**10,580**	**79**
7001	705	117	98	92	85	313	588	0
7002*	1,922	1,606	110	189	9	8	316	0
7003	1,238	1,151	58	29	0	0	87	0
7004*	1,908	1,458	108	40	114	188	450	0
7005	1,492	1,226	190	48	6	22	266	0
7006	1,692	880	424	186	183	19	812	0
7007*	2,926	1,802	178	283	201	462	1,124	0
7008*	2,068	1,200	655	132	52	29	868	0
7010	1,677	1,205	454	18	0	0	472	0
7011	1583	1,216	221	49	91	0	361	6
7012*	1751	1,288	214	19	0	230	463	0
7013	1973	1,614	342	17	0	0	359	0
7015	1668	968	423	45	50	182	700	0
7017	2033	999	720	137	138	32	1,027	7
7018*	1475	1,118	213	31	31	74	349	8
7021*	1911	1,580	190	0	42	99	331	0
7023*	1316	558	335	78	329	9	751	7
7025*	1597	1,378	186	15	0	0	201	18
7115*	9	9	0	0	0	0	0	0
7116*	115	78	37	0	0	0	37	0
7117*	1869	1,593	180	42	18	36	276	0
7118*	325	144	18	73	52	38	181	0
7122.01*	835	541	71	107	61	55	294	0
7122.02*	729	666	63	0	0	0	63	0
7123*	86	9	37	30	10	0	77	0
7124*	473	329	119	0	0	0	119	25
7131*	101	85	8	0	0	0	8	8
7132.01*	0	0	0	0	0	0	0	0

Note: Green shading denotes impacted tracts.
**Data in starred census tracts reflects only the parts of the tracts within the City of Canton*
Source: U.S. Census Bureau, Census 2000 (SF 3, H30)

Figure 4-17
Map: Multifamily Units as Percent of Total Housing by Census Tract, 2000



iii. Foreclosure Trends

HUD NSP Estimates provides foreclosure data at the local level.[29] Between January 2007 and June 2008, the City of Canton had an estimated 1,720 foreclosure filings, representing a foreclosure rate of 12.3%. Six of the eight census tracts previously identified as impacted areas of Black residents had foreclosure rates higher than that of the City overall.

Figure 4-18
Estimated Residential Foreclosure Rates by Census Tract, January 2007 – June 2008

Census tract	Foreclosure Filings	Total Mortgages	Foreclosure Rate
Canton City	**1,720**	**13,936**	**12.3%**
7001	7	44	15.9%
7002*	186	1,229	15.1%
7003	86	484	17.8%
7004*	111	1,067	10.4%
7005	111	611	18.2%
7006	68	641	10.6%
7007*	100	1,276	7.8%
7008*	118	908	13.0%
7010	104	720	14.4%
7011	72	732	9.8%
7012*	126	940	13.4%
7013	122	794	15.4%
7015	59	394	15.0%
7017	71	447	15.9%
7018*	42	218	19.3%
7021*	97	556	17.4%
7023*	15	81	18.5%
7025*	115	743	15.5%
7115*	55	1,269	4.3%
7116*	99	1,412	7.0%
7117*	92	1,262	7.3%
7118*	54	956	5.6%
7122.01*	73	1,433	5.1%
7122.02*	78	1,507	5.2%
7123*	107	1,380	7.8%
7124*	86	1,264	6.8%
7131*	131	1,426	9.2%
7132.01*	154	1,834	8.4%

**Starred census tracts are partially contained within the City. Therefore, census tract totals may be more than the City overall.*

Source: HUD NSP Foreclosure Estimates, released October 2008

[29] HUD NSP Estimates data, covering the period between January 2007 and June 2008, is not an exact count, but distributes the results of a national survey across geographic areas according to a model considering rates of metropolitan area home value decline, unemployment and high-cost mortgages.

In September 2010, RealtyTrac reported 269 new foreclosure filings in Canton, or 1 in every 334 housing units.

Foreclosure activity is related to fair housing to the extent that it is disproportionately dispersed, both geographically and among members of the protected classes. Concentrated foreclosures and residential vacancy threaten the viability of neighborhoods as well as the ability of families to maintain housing and build wealth. Households carrying heavy cost burdens are prime candidates for mortgage delinquency and foreclosure.

Observation

Between January 2007 and June 2008, Canton had a foreclosure rate of 12.3%.

Six of the impacted census tracts had foreclosure rates higher than that of the City.

iv. Protected Class Status and Home Ownership

The value in home ownership lies in the accumulation of wealth as the owner's share of equity increases with the property's value. Paying a monthly mortgage instead of rent is an investment in an asset that is likely to appreciate. According to one study, "a family that puts 5 percent down to buy a house will earn a 100 percent return on the investment every time the house appreciates 5 percent."[30]

Historically, minorities tend to have lower home ownership rates than Whites. In 2000, Blacks had the lowest home ownership rate, at 43.9%, while Asians had the highest rate at 69.1%. Over half (52.1%) of Hispanics households and 65.5% of White households were home owners.

Observation

Lower household incomes among Blacks in Canton are reflected in lower home ownership rates when compared to Whites.

Among Black households, 43.9% were home owners, compared to 65.5% of White households.

[30] Kathleen C. Engel and Patricia A. McCoy, "From Credit Denial to Predatory Lending: The Challenge of Sustaining Minority Homeownership," in Segregation: The Rising Costs for America, edited by James H. Carr and Nandinee K. Kutty (New York: Routledge 2008) p. 82.

Figure 4-19
Home Ownership by Race and Ethnicity, 2000

Census Tract	White		Black		Asian		Hispanic	
	#	%	#	%	#	%	#	%
Canton City	**8,452**	**65.5%**	**2,761**	**43.9%**	**67**	**69.1%**	**161**	**52.1%**
7001	23	5.6%	25	13.3%	0	0.0%	---	---
7002*	989	78.4%	230	46.7%	---	---	0	0.0%
7003	626	78.7%	193	62.3%	5	100.0%	11	100.0%
7004*	1,049	73.6%	154	41.6%	---	---	10	100.0%
7005	572	70.6%	287	58.0%	---	---	---	---
7006	710	57.2%	25	15.2%	---	---	11	100.0%
7007*	1,575	64.8%	35	17.7%	15	65.2%	0	0.0%
7008*	951	57.7%	49	36.8%	9	100.0%	17	53.1%
7010	880	64.7%	36	30.3%	---	---	10	100.0%
7011	1,023	70.7%	7	29.2%	---	---	14	70.0%
7012*	1,111	70.3%	16	18.2%	---	---	7	50.0%
7013	1,138	67.7%	32	34.0%	---	---	7	100.0%
7015	603	48.2%	70	38.9%	---	---	16	44.4%
7017	581	44.5%	81	25.0%	---	---	0	0.0%
7018*	239	52.1%	322	47.3%	---	---	0	0.0%
7021*	271	61.2%	825	68.2%	---	---	14	51.9%
7023*	186	44.1%	148	20.8%	---	---	6	54.5%
7025*	1,008	72.4%	38	42.2%	---	---	18	100.0%
7115*	9	100.0%	---	---	---	---	---	---
7116*	56	48.7%	---	---	---	---	---	---
7117*	1,314	77.1%	40	44.9%	9	100.0%	8	27.6%
7118*	78	30.7%	9	52.9%	9	52.9%	0	0.0%
7122.01*	443	62.9%	6	14.3%	5	45.5%	7	53.8%
7122.02*	596	89.5%	20	74.1%	6	100.0%	5	100.0%
7123*	9	11.4%	0	0.0%	---	---	---	---
7124*	112	45.0%	71	41.0%	9	100.0%	---	---
7131*	26	66.7%	42	67.7%	---	---	---	---
7132.01*	---	---	---	---	---	---	---	---

Note: Green shading indicates impacted tracts.

**Data in starred census tracts reflects only the parts of the tracts within the City of Canton*

Note: Cells for tracts in which no member of a racial or ethnic group live are left blank to differentiate them from tracts in which only renters live.

Source: U.S. Census Bureau, Census 2000 (SF3-H11, H12)

As discussed previously in this report, median household income is lower among Black households than among White households. This factor contributes to the low rates of home ownership among minorities in the City. In the eight census tracts identified as impacted areas, the homeownership rate for Black households was 49.9%. This was higher than the rate of 43.9% for Black households across the entire City, but substantially lower than the citywide rate of homeownership among all racial groups, which was 59.7%. Across Canton's eight areas qualifying as areas of racial concentration, Whites had a homeownership rate of 56.2%, Hispanics had a rate of 47%, and the number of Asian households was too small for reliable analysis.

v. The Tendency of the Protected Classes to Live in Larger Households

Larger families may be at risk for housing discrimination on the basis of race and the presence of children (familial status). A larger household, whether or not children are present, can raise fair housing concerns. If there are policies or programs that restrict the number of persons that can live together in a single housing unit, and members of the protected classes need more bedrooms to accommodate their larger household, there is a fair housing concern because the restriction on the size of the unit will have a negative impact on members of the protected classes.

In Canton, minorities were more likely than Whites to live in families with three or more persons. Among Blacks, 67.4% of families had three or more persons compared to 55.8% of White families. Persons of Some Other Race were most likely to live in larger families, with 81.8% of families comprised of three or more persons.

Figure 4-20
Families with Three or More Persons, 2000

Race	Percent of Families with Three or More Persons
White	55.8%
Black	67.4%
Some Other Race	81.8%
Two or More Races	63.7%
Hispanic	71.0%

Source: U.S. Census Bureau, Census 2000 (SF 4, PCT17)

To adequately house larger families, a sufficient supply of larger dwelling units consisting of three or more bedrooms is necessary. In Canton, where rental units comprise 40.4% of the housing inventory, only 29.5% of the rental housing stock contained three or more bedrooms compared to 76.3% of the owner housing stock.

Figure 4-21
Housing Units by Number of Bedrooms, 2000

Size of Housing Units	Renter-Occupied Housing Stock		Owner-Occupied Housing Stock	
	Number of Units	% Total Units	Number of Units	% Total Units
0-1 bedroom	4,599	35.0%	464	2.4%
2 bedrooms	4,677	35.6%	4,132	21.3%
3 or more bedrooms	**3,879**	**29.5%**	**14,779**	**76.3%**
Total	13,155	100.0%	19,375	100.0%

Source: U.S. Census Bureau, Census 2000 (SF 3, H42)

Observation

Minority households were much more likely to live in larger families than White households.

Almost two-thirds of Black families had three or more persons compared to 55.8% of White families. However, only 29.5% of the rental housing stock contains three or more bedrooms compared to 76.3% of the owner housing stock.

vi. Cost of Housing

Increasing housing costs are not a direct form of housing discrimination. However, a lack of affordable housing does constrain housing choice. Residents may be limited to a smaller selection of neighborhoods because of a lack of affordable housing in those areas.

In Canton, median housing value increased 35.7% between 1990 and 2008, after adjusting for inflation. Most of this occurred during the 1990s; between 2000 and 2008 real housing value decreased slightly. Median gross rent increased more modestly. By comparison, median household income decreased 12.1% during this period. Most of this loss occurred between 2000 and 2008, when real median income fell 20.2%.

Figure 4-22
Trends in Housing Value, Rent and Income, 1990-2008

	1990	2000	2008	Change 1990-2008
Median Housing Value				
Actual Dollars	$36,900	$66,300	$82,500	123.6%
2008 Dollars	$60,786	$82,895	$82,500	35.7%
Median Gross Rent				
Actual Dollars	$298	$420	$525	76.2%
2008 Dollars	$491	$525	$525	6.9%
Median Household Income				
Actual Dollars	$19,807	$28,730	$28,679	44.8%
2008 Dollars	$32,628	$35,921	$28,679	-12.1%

Sources: U.S. Census Bureau, 1990 Census (STF3-H061A, H043A, P080A), Census 2000 (SF3-H76, H63, P53), 2008 American Community Survey (B25077, B25064, B19013); Calculations by Mullin & Lonergan Associates, Inc.

a. Rental Housing

Canton also has lost a large number of affordable rental units. Between 2000 and 2008, the number of affordable rental units renting for less than $500/month decreased by 2,285 units, or 26.7%. Units renting for $1,000 or more, on the other hand, increased over 500%, from 160 units in 2000 to 972 units in 2008.

Figure 4-23
Loss of Affordable Rental Housing Units, 2000-2008

Units Renting for:	2000	2008	Change 2000-2008 #	Change 2000-2008 %
Less than $500	8,552	6,269	-2,283	-26.7%
$500 to $699	3,007	3,387	380	12.6%
$700 to $999	815	2,739	1,924	236.1%
$1,000 or more	160	972	812	507.5%

Sources: U.S. Census Bureau, Census 2000 (SF3, H62), 2008 American Community Survey (B25063)

Observation

Canton lost almost 2,300 units renting for less than $500 between 2000 and 2008.

By comparison, units renting for more than $1,000 increased over 500%, from 160 to 972.

The National Low Income Housing Coalition provides annual information on the Fair Market Rent (FMR) and affordability of rental housing in counties and cities in the U.S. for 2010. In Stark County, the FMR for a two-bedroom apartment is $644. In order to afford this level of rent and utilities, without paying more than 30% of income on housing, a household must earn $2,147 monthly or $25,760 annually. Assuming a 40-hour work week, 52 weeks per year, this level of income translates into a Housing Wage of $12.38.

In Stark County, a minimum-wage worker earns an hourly wage of $7.30. In order to afford the FMR for a two-bedroom apartment, a minimum-wage earner must work 68 hours per week, 52 weeks per year. Or, a household must include 1.7 minimum-wage earners working 40 hours per week year-round in order to make the two-bedroom FMR affordable.

In Stark County, the estimated average wage for a renter is $10.46 an hour. In order to afford the FMR for a two-bedroom apartment at this wage, a renter must work 47 hours per week, 52 weeks per year. Or, working 40 hours per week year-round, a household must include 1.2 workers earning the average renter wage in order to make the two-bedroom FMR affordable.

Observation

Minimum wage and single-income households cannot afford a housing unit renting for the HUD fair market rent in Canton.

This situation forces these individuals and households to double-up with others, or lease inexpensive, substandard units. Minorities and female-headed households will be disproportionately impacted because of their lower-incomes.

Monthly Supplemental Security Income (SSI) payments for an individual are $674 in Stark County and across Ohio. If SSI represents an individual's sole source of income, $202 in monthly rent is affordable, while the FMR for a one-bedroom is $510.

Observation

Persons with disabilities receiving a monthly SSI check for $674 as their sole source of income cannot afford a one-bedroom unit in Canton or Stark County renting at the fair market rate of $510.

b. Sales Housing

One method used to determine the inherent affordability of a housing market is to calculate the percentage of homes that could be purchased by households at the median income level. The median household income in the City of Canton was $28,679 in 2008. With this income, a household could purchase a home selling for $104,000, which was comparable to Stark County's average sales price of $102,901.

It is possible also to determine the affordability of the housing market for each racial or ethnic group in the City. To determine affordability (i.e., how much mortgage a household could afford), the following assumptions were made:

- The mortgage was a 30-year fixed rate loan at a 5.0% interest rate,
- The buyer made a 10% down payment on the sales price,
- Principal, interest, taxes and insurance (PITI) equaled no more than 30% of gross monthly income,
- Property taxes were assessed for the Canton City School District 2009 tax rate of 1.553% of the market price, and
- There was no additional consumer debt (credit cards, etc).

Figure 4-24 details the estimated *maximum* affordable sales prices and monthly PITI payments for Whites, Blacks, Asians and Hispanics in Canton. The maximum affordable home purchase price for Whites, Asians, and Hispanics was well above the average sales price of $100,901 in 2009. Due to a significantly lower median household income, Black households have much more limited access to the sales market. Black households earning median household income can afford a house valued at $57,100, which is equivalent to only 56.6% of the average sales price in Stark County.

Figure 4-24
Maximum Affordable Purchase Price by Race/Ethnicity, 2009

	Median Household Income	Monthly Mortgage Payment: Mortgage Principal & Interest	Monthly Mortgage Payment: Real Estate Taxes	Monthly Mortgage Payment: Homeowner's Insurance & PMI	Monthly Mortgage Payment: Total PITI Payment	Maximum Affordable Purchase Price
Canton City	**$28,679**	**$502**	**$135**	**$80**	**$717**	**$104,000**
Whites	$34,156	$610	$164	$80	$854	$126,300
Blacks	$17,194	$276	$74	$80	$430	$57,100
Asians	$34,447	$616	$165	$80	$861	$127,500
Hispanics	$36,147	$650	$174	$80	$904	$134,500
2009 Stark County Average Sales Price: $100,901						

Sources: 2006-2008 American Community Survey (B19013, B19013A, B19013B); Stark County Association of Realtors; Stark County Auditor's Office; Calculations by Mullin & Lonergan Associates, Inc.

Observation

Black households have significantly fewer options when purchasing a home compared to Whites, Asians and Hispanics.

Lower household incomes among Blacks are insufficient to purchase a home selling for the average sales price of $104,000 in Canton.

vii. Protected Class Status and Housing Problems

Lower-income minority households tend to experience housing problems at a higher rate than lower-income white households.[31] In Canton, a review of housing problems among lower-income families shows a more complex picture. Among renter households earning 80% or less of MFI, Black and Hispanic households were less likely than Whites to have a housing problem. Across the categories of households, Blacks were least likely to have a housing problem.

Among owners, on the other hand, Blacks experienced housing problems at the highest rates. Hispanic households also were least likely to have a housing problem, with 37.8% with a housing problem, compared to 38.5% of White households and 47.2% of Black households.

[31] HUD defines housing problems as (1) cost burden of 30% or more (i.e. paying more than 30% of gross income on monthly housing expenses), and/or (2) lacking complete kitchen or plumbing facilities, and/or (3) overcrowding of more than 1.01 persons per room.

Figure 4-25
Lower-Income Households with Housing Problems, 2000

	Total Households 0-80% of MFI		Elderly & 1-2 Person Households 0-80% of MFI		Family Households 0-80% of MFI		All Other Households 0-80% of MFI	
	Total	Housing Problem	Total	%	Total	%	Total	%
Renters								
White Non-Hispanic	6,612	49.8%	1,596	48.6%	2,585	47.1%	2,431	53.5%
Black Non-Hispanic	2,761	45.1%	346	43.4%	1,521	45.4%	894	45.3%
Hispanic	116	48.3%	12	66.7%	58	48.3%	46	43.5%
Total	**9,769**	**47.7%**	**1,930**	**47.2%**	**4,310**	**46.7%**	**3,529**	**49.3%**
Owners								
White Non-Hispanic	6,430	38.5%	2,970	26.7%	2,341	45.1%	1,119	56.0%
Black Non-Hispanic	1,234	47.2%	414	43.0%	634	47.5%	186	55.9%
Hispanic	74	37.8%	28	35.7%	32	12.5%	14	100.0%
Total	**7,776**	**39.7%**	**3,392**	**28.3%**	**3,042**	**45.4%**	**1,342**	**55.4%**

Source: HUD Comprehensive Housing Affordability Strategy data

Observation

Lower-income Black home owners experienced housing problems at greater rates than White and Hispanic home owners.

Among owner households, 47.2% of Blacks experienced housing problems, compared to 38.5% of Whites and 37.8% of Hispanics.

C. Review of Public Sector Policies

The analysis of impediments is a review of impediments to fair housing choice in the public and private sector. Impediments to fair housing choice are any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status or national origin that restrict housing choices or the availability of housing choices, or any actions, omissions or decisions that have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex, disability, familial status or national origin. Policies, practices or procedures that appear neutral on their face but which operate to deny or adversely affect the provision of housing to persons of a particular race, color, religion, sex, disability, familial status, or national origin may constitute such impediments.

An important element of the AI includes an examination of public policy in terms of its impact on housing choice. This section evaluates the public policies in the City of Canton to determine opportunities for furthering the expansion of fair housing choice.

i. Policies Governing Investment of Federal Entitlement Funds

From a budgetary standpoint, housing choice can be affected by the allocation of staff and financial resources to housing related programs and initiatives. The decline in federal funding opportunities for affordable housing for lower income households has shifted much of the challenge of affordable housing production to state, county and local government decision makers.

The recent Westchester County, NY, fair housing settlement also reinforces the importance of expanding housing choice in non-impacted areas (i.e. areas outside of concentrations of minority and LMI persons). Westchester County violated its cooperation agreements with local units of government which prohibit the expenditure of CDBG funds for activities in communities that do not affirmatively further fair housing within their jurisdiction or otherwise impede the City's action to comply with its fair housing certifications.

The City of Canton's federal entitlement funds received from HUD can be used for a variety of activities to serve a variety of aims, as follows:

- Community Development Block Grant (CDBG): The primary objective of this program is to develop viable urban communities by providing decent housing, a suitable living environment, and economic opportunities, principally for persons of low and moderate income levels. Funds can be used for a wide array of activities, including: housing rehabilitation, homeownership assistance, lead-based paint detection and removal, construction or rehabilitation of public facilities and infrastructure, removal of architectural barriers, public services, rehabilitation of commercial or industrial buildings, and loans or grants to businesses.
- HOME Investment Partnerships Program (HOME): The HOME program provides federal funds for the development and rehabilitation of affordable rental and ownership housing for low and moderate income households. HOME funds can be used for activities that promote affordable rental housing and homeownership by low and moderate income households, including reconstruction, moderate or substantial rehabilitation, homebuyer assistance, and tenant-based rental assistance.

Canton also received funds through the Neighborhood Stabilization Program (NSP), which was established for the purpose of stabilizing communities that have suffered from foreclosures and abandonment. Through the purchase and redevelopment of foreclosed and abandoned homes and residential properties, the goal of the program is being realized. NSP1, a term that references the NSP funds authorized under Division B, Title III of the Housing and Economic Recovery Act (HERA) of 2008, provides grants to all states and selected local governments on a formula basis.

As a member of the Stark County HOME Consortium, the City of Canton accounts for its CDBG, HOME and NSP funds in its Five-Year Consolidated Plan and annual plans.

The City's Department of Development (DOD) is the lead agency for programs covered in the Consolidated Plan. Priorities are generated primarily by the City's administration and City Council, based on an ongoing dialogue with community members. Council members represent the interests of their respective districts; citizens are invited to speak at Council meetings; and the administration hosts "Mayor's Night," a series of monthly community meetings at rotating locations that offer citizens the chance to be heard.

In its 2009-13 Consolidated Plan, the City of Canton identified priority needs as:

- **Decent, affordable housing**, which it addresses through down-payment assistance programs, home ownership counseling, rehabilitation assistance for homeowners, foreclosure mediation, homelessness prevention programs and the construction and renovation of housing to expand the number of structurally sound units available to low- and moderate-income households, and
- **Safe neighborhoods and access to services**, which it addresses by funding agencies that deal with drug awareness and prevention, health care, job training and education and youth services, including minority business development.

In program year 2010, according to the CAPER, the City of Canton received $2,893,864 in CDBG entitlement funds, $997,121 in HOME funds and $126,884 in Emergency Shelter Grant funds. Additionally, the City received $773,783 in CDBG-R funds and $1,183,577 in Homelessness Prevention and Rapid Re-housing funds, along with program income from its CDBG and HOME programs.

A large portion of available CDBG public service funds were spent to preserve program offerings at a City community center threatened by budget cuts. The City reported that it assisted income-eligible households through homeowner rehabilitation, a home repair program, a down payment assistance program, a furnace replacement program and a sidewalk replacement program. Additionally, the City works with the Stark County Out of Poverty Partnership and CHDOs to provide expanded affordable housing options. The City contracts with subrecipients to board up vacant houses. In program year 2010, the City provided 15 nonprofit agencies with CDBG grants to provide services, improvements to public facilities and social activities. The City maintains an active economic development program, partnering with other agencies and leveraging other funds to invest in job creation.

The CAPER narrative provided for review did not specify the number or location of affordable housing units created through the use of entitlement funds in the given program year, though it noted that sales of existing CHDO properties slowed as a result of the recession. Late in 2009, the City reduced the sale price of its affordable housing in an effort to sell them more quickly.

The CAPER also reports on the City's fair housing efforts, which were enhanced by a 2006 Fair Housing Assistance Program (FHAP) grant from HUD that allowed Canton to develop an in-house fair housing program. In 2008, the City created the Department of Compliance to oversee the Fair Housing Assistance Program, MBE/WBE program, Equal Employment Opportunity (EEO) operations and minority recruitment for the City's safety forces. The Department of Compliance has expanded awareness initiatives and maintained a caseload of fair housing complaint investigations as well as a discrimination testing program. While the CAPER does not specify the amount of entitlement funding spent on these pure fair housing activities, the level of accomplishment indicates that fair housing is an important issue on the City's radar.

Canton's CDBG application packet is provided to any parties interested in participating in the City's federal entitlement program. This document provides a detailed overview of the purposes and requirements of the CDBG program. Notably, the City requires that funding subrecipients comply with the City's Codified Ordinance 515, the Fair Housing Code. The ordinance encompasses and expands upon the provisions of the federal Fair Housing Act.

ii. Affirmative Marketing Policy

As a recipient of CDBG and HOME funds, the City is required to adopt affirmative marketing procedures and requirements for all CDBG- and HOME-assisted housing with five or more units. Such a plan should include:

- Methods of informing the public, owners, and potential tenants about fair housing laws and the City's policies
- A description of what the owners and/or the City will do to affirmatively market housing assisted with CDBG or HOME funds
- A description of what the owners and/or the City will do to inform persons not likely to apply for housing without special outreach
- Maintenance of records to document actions taken to affirmatively market CDBG- and HOME-assisted units and to assess marketing effectiveness, and
- A description of how efforts will be assessed and what corrective actions will be taken where requirements are not met.

The City's HOME Affirmative Marketing Policy, which applies to housing projects with five or more units, was reviewed as part of this analysis. Canton's Affirmative Marketing Policy applies explicitly to HOME projects, though all such projects are administered as part of a regional consortium by the Stark County Regional Planning Commission. The City does not typically apply CDBG funds to activities that would trigger compliance with HUD's affirmative marketing requirements (namely, those involving housing with five or more units), but the Affirmative Marketing Policy should also apply to any such projects supported by CDBG or other City funds.

The City's Department of Development is the agency deemed responsible for administering the Affirmative Marketing Policy. The Department's obligations include informing the community about the policy through periodic updates and training workshops with grantees; including HUD Equal Housing Opportunity designations on all of the City's graphic presentations related to the HOME program; distributing fair housing literature; and providing information to anyone who contacts the Department with questions regarding affirmative marketing, federal fair housing law, tenant rights, assisted housing and code violation in tenant-occupied dwellings.

The Policy specifies a separate set of requirements for anyone participating in a housing project assisted with HOME funds. All requirements imposed on HOME property owners/developers are effective throughout the affordability period. In addition to incorporating Equal Housing Opportunity designations in all correspondence relating to the HOME program, participants must advertise vacant units (and those becoming vacant in 30 days) in *The Reporter* and/or other minority newspapers. The participant must also notify various local and County public agencies of the housing opportunity. To ensure that applications are solicited from those in the housing market who are least likely to apply without special outreach, the participant must send notice of the availability of units to a specified list of agencies serving special needs populations. Finally, the policy calls for the City to request owners of HOME-assisted properties to maintain records on the demographic statistics of applicants and the ways in which vacancies were advertised.

The City annually assesses the effectiveness of the Affirmative Marketing Policy and the efforts taken by the City and HOME/CHDO participants. To determine results, the City examines whether members of the protected classes applied for or became tenants or owners of units that were affirmatively marketed. If one or more demographic groups are not represented within the context of existing neighborhood composition, the City will review procedures to determine what changes, if any, might be made. If the City determines that a participant has failed to carry out the requirements of the policy, the City may consider disqualifying the participant from future HOME assistance or requiring immediate repayment of its grant or loan.

Observation

Canton's Affirmative Marketing Policy appears to be comprehensive, addressing all HUD requirements. However, the City could further improve the policy by expanding its applicability to also include housing with five or more units assisted by CDBG or other City funds. Additionally, the Policy should address outreach to persons with limited English proficiency.

iii. Site and Neighborhood Selection Policy

Recipients of HOME funds are required to administer their program in compliance with the regulations found at 24 CFR 983.6(b), known as the Site and Neighborhood Standards. These standards address the site location requirements for newly constructed rental units financed with HOME funds.

Site selection for HOME-assisted construction of new rental units must comply with several standards, including among other things, promoting greater choice of housing opportunities and avoiding undue concentration of assisted persons in areas containing a high concentration of LMI persons. With few exceptions, site selection must include a location that is not in an area of minority concentration.

The City's 2009-13 Consolidated Plan does not state specific standards for site and neighborhood selection, but it explains that much of its entitlement investment occurs in the City's southern two-thirds, as census tracts in this area have a majority of low- and moderate-income residents, as well as a concentration of minorities. Programs that are income-qualified are open to persons from all areas of the City, while area-qualified programs involve projects taking place in low- and moderate-income census tracts.

Observation

The City identifies its southern two-thirds in the Consolidated Plan as an area of investment of entitlement funds by virtue of predominantly low- and moderate-income households and minority concentration. In addition to investing in the stabilization and revitalization of this area using CDBG funds, the City should expand housing choice by creating new housing opportunities in non-concentrated areas.

iv. Appointed Boards and Commissions

A community's sensitivity to fair housing issues is often determined by people in positions of public leadership. The perception of housing needs and the intensity of a community's commitment to housing related goals and objectives are often measured by board members, directorships, and the extent to which these individuals relate within an organized framework of agencies, groups, and individuals involved in housing matters. The expansion of fair housing choice requires a team effort and public leadership and commitment is a prerequisite to strategic action.

Demographic information on current board and commission members was not available for review. In order to evaluate the extent to which members of the protected classes are represented among those appointed to public boards, the City should conduct an annual voluntary survey of current board and commission members.

a. Fair Housing Commission

The Fair Housing Commission was established by Canton's Fair Housing Code to investigate housing discrimination claims in the City. The nine-member body is appointed by the Mayor and confirmed by City Council. By law, of the nine members no more than five may be of the same political party and no more than three may be representatives from the real estate or construction industries, lending institutions, building and trade unions, or insurance agencies or companies.

b. Housing Advisory Board

The Housing Advisory Board consists of 11 to 21 members who represent a wide variety of groups, including lending institutions, housing developers, real estate brokers, and the Stark Metropolitan Housing Authority, among others. The Board receives, reviews, and advises on comprehensive plans for the development and maintenance of affordable housing, and it advises on other programs as needed. Board members are appointed by the Mayor and confirmed by City Council.

c. City Planning Commission

The City Planning Commission is an 11-member body appointed by the Mayor. It reviews any general neighborhood plan and plans for urban renewal or redevelopment. The Commission then submits recommendations on such plans to City Council.

d. Board of Building Appeals

The Board of Building Appeals is a seven-member body appointed by the Mayor and confirmed by City Council. The Board hears appeals to the enforcement of the City Building Code; makes recommendations for amendments to the Building Code; advises on practices in the home improvement industry; and makes recommendations concerning the administration and operation of home improvement contract laws.

Observation

The extent to which members of the protected classes are represented on appointed public boards and commissions is currently unclear.

The City should conduct an annual voluntary demographic survey of public board and commission members to evaluate representation and inform its recruitment efforts.

v. Accessibility of Residential Dwelling Units

From a regulatory standpoint, local government measures define the range and density of housing resources that can be introduced in a community. Housing quality standards are enforced through the local building code and inspections procedures.

The City of Canton has adopted the Ohio Building Code to apply to the construction and alteration of every building and structure in the City. One-, two- and three-family dwellings are also subject to the Residential Building Code of Ohio. Additional building code standards include:

- 2007 Ohio Mechanical Code
- 2007 Ohio Plumbing Code
- 2008 National Electric Code

Per the Ohio Building Code, accessibility standards for units are based on the ADA Accessibility Guidelines. The City's Building Department's Code Enforcement Division is responsible for residential, commercial and industrial code enforcement.

vi. Language Access Plan for Persons with Limited English Proficiency

The City of Canton does not currently have a Language Access Plan (LAP) to enhance services offered to persons with LEP. As stated previously, among native Spanish speakers, the number of persons who speak English less than "very well" exceeds 1,000. As a result, the City of Canton should perform a four-factor analysis to determine the extent to which an LAP may be needed.[32]

Observation

The City of Canton must determine the need for a Language Access Plan (LAP) to assist persons with limited English proficiency (LEP) in accessing its programs and services.

If it is determined that a need for an LAP exists, the City must prepare the LAP to comply with Title VI of the Civil Rights Act of 1964.

vii. Comprehensive Planning

A community's comprehensive plan is a statement of policies relative to new development and preservation of existing assets. In particular, the land use element of the comprehensive plan defines the location, type and character of future development. The housing element of the comprehensive plan expresses the preferred density and intensity of residential neighborhoods within the County. Taken together, the land use and housing elements of the comprehensive plan define a vision of the type of community that the City of Canton wishes to become.

[32] The four-factor analysis is detailed in the *Federal Register* dated January 22, 2007.

The City's latest comprehensive plan, adopted in July 2000, was not available for review. However, a review of the plan completed by SCRPC provides insight as to land use and housing elements that are relevant to fair housing issues. The Commission reviewed all local comprehensive plans to determine their consistency with the County's 2030 Comprehensive/Transportation Plan, adopted in 2005. SCRPC determined that Canton's plan generally coincided with County aims.

According to SCRPC's review, the major themes Canton identifies in its plan are:

- Concentrations of substandard housing, especially encircling downtown,
- A demolition rate that exceeds the rate of new construction,
- A need to preserve property values,
- The need to create a desirable atmosphere to capture benefits of recent trends in "urban homesteading/gentrification,"
- The need to increase home ownership,
- Applying the "city of neighborhoods" concept in redevelopment,
- Maintaining the momentum of downtown redevelopment,
- Addressing a lack of general fund commitment to community planning,
- Aggressively adding greenfields as development sites and encouraging brownfield redevelopment, and
- Ensuring that the benefits of redevelopment are more than site-specific

In its comprehensive plan, Canton advances strategies to revitalize housing downtown and in other neighborhoods to avert problems such as declining property values and increasing absentee landlords. Specifically, the plan includes means of increasing home ownership rates, improving housing quality and assisting neighborhood advocacy groups. The reuse of brownfield areas is an apparently prominent theme, factoring into the potential redevelopment of downtown. The plan suggests annexing additional greenfield space for higher-end housing.

Canton published a more detailed Downtown Development Plan in 2003, including broad plans for revitalization as well as site-specific strategies. The plan was intended to serve as the formal planning document to be consulted in regard to capital improvement projects downtown, as a means of recruiting developers and businesses and as a means of guiding individual projects to reinforce a shared vision for the area. Among other strategies, the plan recommends the development of downtown housing to increase the local consumer base within walking distance and to provide units near work locations. In various neighborhoods, the plan recommends the development of a variety of housing sizes and types, ranging from single-family to medium-density fourplexes and townhouses. The recommendation appears to be primarily related to achieving a desired character for the downtown area, not in response to community needs for specific housing options, and there is no mention of affordability levels for the proposed housing. However, housing choice for members of the protected classes could be well served if affordable units are developed within walkable distance of jobs, goods and services or in areas well connected to public transit.

viii. Zoning

In Ohio, the power behind land development decisions resides with municipal governments through the formulation and administration of local controls. These include comprehensive plans, zoning ordinances and subdivision ordinances, as well as building and occupancy permits.

The City of Canton's Zoning Ordinance, Part 11 of the City's Codified Ordinances (titles five and seven), was reviewed to identify potential impediments to fair housing choice. This analysis is based on the following five topics raised in HUD's Fair Housing Planning Guide, which include:

- The opportunity to develop various housing types, including apartments and housing at various densities
- The opportunity to develop alternative designs, such as cluster developments, planned residential developments, inclusionary zoning and transit-oriented developments
- Minimum lot size requirements
- Dispersal requirements and regulatory provisions for housing facilities for persons with disabilities (i.e. group homes) in single-family zoning districts
- Restrictions on the number of unrelated persons in dwelling units

a. Date of Ordinance

Generally speaking, the older a zoning ordinance, the less effective it will be. Older zoning ordinances have not evolved to address changing land uses, lifestyles, and demographics. However, the age of the zoning ordinance does not necessarily mean that the regulations impede housing choice by members of the protected classes.

The current zoning ordinance was adopted in 1977. Periodic amendments have since updated sections of the code.

b. Residential Zoning Districts and Permitted Dwelling Types

The number of residential zoning districts is not as significant as the characteristics of each district, including permitted land uses, minimum lot sizes, and the range of permitted housing types. However, the number of residential zoning districts is indicative of the jurisdiction's desire to promote and provide a diverse housing stock for different types of households at a wide range of income levels.

The City of Canton has a wide variety of residential districts, in addition to districts designated for other purposes that permit certain dwelling types by right or conditionally. Four R-1 districts (R-1a, R-1b, R-1c and R-1d) are single-family zones at various densities. The only by-right use in any R-1 district is single-family housing. The ordinance does not specify that dwellings must be detached, but the inclusion of a separate "two-family residential" district indicates that this is the intent. No other residential uses are conditionally permitted in R-1 districts. The two-family R-2 district allows duplexes by-right and "residential social service facilities" as a conditional use. These facilities will be addressed later in this section. The R-3 garden and townhouse apartment district allows R-2 uses as well as multi-family dwellings less than 28 feet in height. R-4 allows all R-3 uses and multi-family dwellings up to 45 feet high. Single-family dwellings are also permitted in the municipal agriculture district, and most residential uses are permitted in the City's business districts.

The flexibility to develop multi-family housing in mixed-use areas of Canton is a necessity, given the minimal amount of land designated as R-2, R-3 and R-4 districts. The vast majority of residential space in the City is zoned R-1, leaving only extremely limited developable land available for the construction of multi-family housing. Multi-family housing represents an important affordable housing option for lower-income households. Because members of the protected classes often fall into this category, a lack of affordable housing may impede housing choice by individuals and families protected under federal, state and local fair housing statutes.

Observation

There is a limited amount of land in Canton zoned for and available for the development of multi-family dwellings.

Because multi-family housing is an affordable housing option, there must be parcels of land zoned for multi-family use and available for development and/or redevelopment.

c. Permitted Residential Lot Sizes

Excessively large lot sizes may deter development of affordable housing. A balance should be struck between areas with larger lots and those for smaller lots that will more easily support creation of affordable housing. Finally, the cost of land is an important factor in assessing affordable housing opportunities. Although small lot sizes of 10,000 square feet or less may be permitted, if the cost to acquire such a lot is prohibitively expensive, then new affordable housing opportunities may be severely limited, if not non-existent.

In Canton, the minimum lot size in R-1 districts ranges from 6,000 square feet per family (R-1a) to 43,560 square feet per family. While the larger lot sizes in R-1c (20,000 square feet per family) and R1d are considered excessive relative to the development of affordable units, the zoning map demonstrates that many smaller-minimum areas exist throughout the City. Considered as a whole, the variety of R-1 districts provides for a wide variety of neighborhoods accommodating a range of housing types and levels of affordability. The minimum lot sizes for multi-family districts were also not considered prohibitive.

d. Alternative Design

Allowing alternative designs provides opportunities to expand the supply of affordable housing by reducing the cost of infrastructure spread out over a larger parcel of land. Alternative designs may also increase the economies of scale in site development, further supporting the development of lower cost housing. Alternative designs can promote other community development objectives, including agricultural preservation or protection of environmentally sensitive lands, while off-setting large lot zoning and supporting the development of varied residential types. However, in many communities, alternative design developments often include higher-priced homes. Consideration should be given to alternative design developments that seek to produce and preserve affordable housing options for working and lower income households.

The City of Canton's Planned Unit Development (PUD) overlay provides a degree of flexibility in regard to land use and design regulations. The PUD is an option intended to accommodate a maximum choice of living environments by allowing a variety of housing and building types and permitting an increased density per acre and a reduction in lot dimensions, yards, building setbacks and area requirements. PUD sites must be at least three acres, though the City considers smaller parcels on the basis of their potential to satisfy PUD objectives. It is possible that Canton's PUD districts allow for expanded housing options due to their provision of mixed housing types and more dense development. However, the ordinance does not include an affordable housing set-aside. Such PUD arrangements typically result in the development of lower-density, non-affordable homes.

e. Definition of Family

Local zoning and land use laws that treat groups of unrelated persons with disabilities less favorably than similar groups of unrelated persons without disabilities violate the Fair Housing Act. Restrictive definitions of family may impede unrelated individuals from sharing a dwelling unit. Defining family broadly advances non-traditional families and supports the blending of families who may be living together for economic purposes. Restrictions in the definition of family typically cap the number of unrelated individuals that can live together. These restrictions can impede the development of group homes, effectively restricting housing choice for persons with disabilities.

The City of Canton updated its definition of "family" in 2009. The City currently defines a family as one or more persons related to each other by birth, marriage or law, occupying a dwelling unit and living as a single housekeeping unit or four or fewer unrelated persons living in a dwelling unit as a single housekeeping unit. This is to be distinguished from persons in a boarding house, fraternity house, sorority house, lodging house, group home of seven or more persons, motel, hotel or rooming house.

The City's cap of four persons in non-related households has the effect of limiting many modern housing arrangements, many of which are for economic purposes. A more ideal definition would not distinguish between unrelated and related persons, but would focus on the manner in which persons live together as a cohesive household.

f. Regulations for Group Homes for Persons with Disabilities

Group homes are residential uses that do not adversely impact a community. Efforts should be made to ensure group homes can be easily accommodated throughout the community under the same standards as any other residential use. Of particular concern are those that serve members of the protected classes such as the disabled. Because a group home for the disabled provides a non-institutional experience for its occupants, imposing special conditions is contrary to the purpose of a group home. More importantly, the restrictions, unless required of all residential uses in the zoning district, impede the creation of group homes and are in violation of the Fair Housing Act.

Two primary purposes of a group home residence are normalization and community integration. By allowing group residences throughout the community in agreement with the same standards as applied to all other residential uses occupied by a family, the purposes of the use are not hindered and housing choice for the disabled is not impeded. Toward this end, the imposition of distancing or separation requirements on group homes for persons with disabilities is a violation of the Fair Housing Act.

Canton's defines a "residential social service facility" as "a facility or home which provides resident services to a group of individuals of whom one or more are unrelated; it may provide additional supervised programming services. These individuals may be mentally retarded, released from state institutions, juvenile offenders, drug or alcoholic offenders, or wards of the court or welfare system who are undergoing rehabilitation and/or are being provided services to meet their needs. This category includes, but is not limited to, facilities licensed, supervised or sponsored by any political subdivision or judicial authority. This category includes, but is not limited to, facilities commonly referred to as 'halfway houses' or 'group homes.'"

Within this definition, there are two types of facility: a "family residential social service facility," which serves three or fewer residents, and a "group residential social service facility," which has four or more. The latter is not a permitted use in single-family residential districts. Group homes of four or more residents are conditionally permitted in multi-family districts. Because the Fair Housing Act prohibits the imposition of additional requirements or limitations on the development of group homes for persons with disabilities, these restrictions on the siting of group homes do not conform to federal law.

Conditionally permitted land uses require a public hearing, which can subject an applicant to unnecessary opposition from neighbors and elected officials. Generally speaking, group homes with up to eight residents should be permitted by-right in residential zoning districts where single-family dwelling units are permitted by-right.

In addition, the City should distinguish between group homes for persons with disabilities as defined by the Fair Housing Act and other types of group living arrangements (i.e. homes for juvenile offenders, etc). Persons with disabilities are clearly defined in the federal law and are members of a protected class, whereas released offenders, etc. may not be.

Finally, by amending its zoning ordinance to include the term "persons with disabilities," the City can eliminate outdated and offensive phrases (i.e. "mentally retarded").

Observation

The City of Canton places undue restrictions on group homes for persons with disabilities that are inconsistent with the Fair Housing Act. The City should amend its ordinance to remove these restrictions and eliminate outdated, offensive language.

D. Private Sector Policies

i. Mortgage Lending Practices

Under the terms of the Financial Institutions Reform, Recovery, and Enforcement Act of 1989 (F.I.R.R.E.A.), any commercial lending institution that makes five or more home mortgage loans must report all residential loan activity to the Federal Reserve Bank under the terms of the Home Mortgage Disclosure Act (HMDA). The HMDA regulations require most institutions involved in lending to comply and report information on loans denied, withdrawn, or incomplete by race, sex, and income of the applicant. The information from the HMDA statements assists in determining whether financial institutions are serving the housing needs of their communities. The data also helps to identify possible discriminatory lending practices and patterns.

The most recent HMDA data available for the City of Canton is from 2007 to 2009. Reviewing this data helps to determine the need to encourage area lenders, other business lenders, and the community at large to actively promote existing programs and develop new programs to assist residents in securing home mortgage loans for home purchases. The data focus on the number of homeowner mortgage applications received by lenders for home purchase of one- to four-family dwellings and manufactured housing units in the City. The information provided is for the primary applicant only. Co-applicants were not included in the analysis. In addition, where no information is provided or categorized as not applicable, no analysis has been conducted due to lack of information. Figure 4-26 summarizes three years of HMDA data by race, ethnicity, and action taken on the applications, with detailed information to follow.

Figure 4-26

Summary Report Based on Action Taken Mortgage Data, 2007-2009

	2007		2008		2009	
	#	%	#	%	#	%
Mortgages applied for	**1,674**	**100.0%**	**1,161**	**100.0%**	**821**	**100.0%**
Black	168	10.0%	86	7.4%	45	5.5%
White	1,379	82.4%	985	84.8%	736	89.6%
Asian	13	0.8%	2	0.2%	1	0.1%
Hispanic*	22	1.3%	8	0.7%	12	1.5%
Other race	8	0.5%	4	0.3%	4	0.5%
No information/NA	106	6.3%	84	7.2%	35	4.3%
Mortgages originated	**1,163**	**69.5%**	**846**	**72.9%**	**639**	**77.8%**
Black	89	53.0%	53	61.6%	28	62.2%
White	1,018	73.8%	736	74.7%	587	79.8%
Asian	9	69.2%	2	100.0%	1	100.0%
Hispanic*	15	68.2%	5	N/A	7	58.3%
Other race	5	62.5%	4	100.0%	1	25.0%
No information/NA	42	39.6%	51	60.7%	22	62.9%
Mortgages denied	**300**	**17.9%**	**159**	**13.7%**	**98**	**11.9%**
Black	54	32.1%	22	25.6%	9	20.0%
White	201	14.6%	125	12.7%	81	11.0%
Asian	2	15.4%	-	0.0%	-	0.0%
Hispanic*	6	27.3%	1	N/A	3	25.0%
Other race	3	37.5%	-	0.0%	1	25.0%
No information/NA	40	37.7%	12	14.3%	7	20.0%

Note: Data is for home purchase loans for owner-occupied one-to-four family and manufactured units. Total applications do not include loans purchased by another institution. Other application outcomes include approved but not accepted, withdrawn and incomplete.

* Hispanic ethnicity is counted independently of race.

Source: Federal Financial Institutions Examination Council, 2007-09

The most obvious trend in 2007-09 HMDA data for Canton is the steep drop in the number of loan applications during those years. This can be attributed primarily to stagnating home sales in the City that coincided with the national housing market crisis. The number of loan applications dropped by 513 (30.6%) from 2007 to 2008, then fell by an additional 340 (29.3%) in 2009. This is an overall drop of 853 applications or 51.0% over three years.

Applications from White households, the largest race or ethnicity group, fell 46.6% (643 applications) during this time. In comparison, applications from Black households fell 73.2% (123 applications). This changed the racial and ethnic composition of applications. In 2007, 10.0% of loan applications were submitted by Black households. By 2009, this fell to 5.5%. As mentioned in the demographics section earlier, Blacks represent 20.5% of Canton's population.

The number of loan applications resulting in originations declined by 524 (45.1%) over the three-year period. This drop in the number of originations is not surprising given the large decrease in applications. The net result was an increase in the proportion of applications that resulted in loan origination, up to 77.8% in 2009 from 69.5% in 2007.

The number of denials also declined along with applications and originations, decreasing by 202 (67.3%) from 2007 to 2009. Again, this is likely because of the sharp drop in applications as a whole.

The following sections contain detailed analysis for applications filed in 2009, the latest for which information is available.

Figure 4-27
Summary Report Based on Action Taken Mortgage Data, 2009

	Total Applications*		Originated		Approved Not Accepted		Denied		Withdrawn/ Incomplete	
	#	%	#	%	#	%	#	%	#	%
Loan Type										
Conventional	251	30.6%	186	74.1%	10	4.0%	35	13.9%	20	8.0%
FHA	523	63.7%	418	79.9%	13	2.5%	57	10.9%	35	6.7%
VA	34	4.1%	28	82.4%	1	2.9%	2	5.9%	3	8.8%
FSA/RHS	13	1.6%	7	53.8%	-	0.0%	4	30.8%	2	15.4%
Loan Purpose: Home Purchase										
One to four-family unit	813	99.0%	634	78.0%	24	3.0%	95	11.7%	60	7.4%
Manufactured housing unit	8	1.0%	5	62.5%	-	0.0%	3	37.5%	-	0.0%
Applicant Race										
American Indian/Alaska Native	2	0.2%	1	50.0%	-	0.0%	-	0.0%	1	50.0%
Asian/Pacific Islander	1	0.1%	1	100.0%	-	0.0%	-	0.0%	-	0.0%
Hawaiian	2	0.2%	-	0.0%	-	0.0%	1	50.0%	1	50.0%
Black	45	5.5%	28	62.2%	2	4.4%	9	20.0%	6	13.3%
Hispanic**	12	1.5%	7	58.3%	-	0.0%	3	25.0%	2	16.7%
White	736	89.6%	587	79.8%	21	2.9%	81	11.0%	47	6.4%
No information	35	4.3%	22	62.9%	1	2.9%	7	20.0%	5	14.3%
Not applicable	-	0.0%	-	N/A	-	N/A	-	N/A	-	N/A
Applicant Sex										
Male	496	60.4%	384	77.4%	17	3.4%	60	12.1%	35	7.1%
Female	301	36.7%	238	79.1%	6	2.0%	34	11.3%	23	7.6%
No information	24	2.9%	17	70.8%	1	4.2%	4	16.7%	2	8.3%
Not applicable	-	0.0%	-	N/A	-	N/A	-	N/A	-	N/A
Total	821	100.0%	639	77.8%	24	2.9%	98	11.9%	60	7.3%

Source: Federal Financial Institutions Examination Council, 2009

Note: Percentages in the Approved, Approved Not Accepted, Denied, and Withdrawn/Incomplete categories are calculated for each line item with the corresponding Total Applications figures. Percentages in the Total Applications categories are calculated

* Total applications do not include loans purchased by another institution.

** Hispanic ethnicity is counted independently of race.

a. Conventional Loans vs. Government-Backed Loans

Loan types in 2009 included conventional mortgage loans and a variety of government-backed loans, including FHA and VA. Comparing these loan types helps to determine if the less stringent underwriting standards and lower down payment requirements of government-backed loans expand home ownership opportunities. In Canton in 2009, 69.4% (570) of households that applied for a mortgage loan applied for a government-backed loan. Of these, 41 (7.2%) were minority households. There were 58 total loan applications from minority households in 2009, meaning that 70.7% of all loan applications from minority households were for government-backed loans.

- FHA loans: 10.9% (57 of 523 applications).
- VA-guaranteed loans: 5.9%. (2 of 34 applications).
- Conventional loans: 13.9% (35 of 251 applications).
- FSA/RHS loans: 30.8% (4 of 13 applications).

b. Denial of Applications

In 2009, the mortgage applications of 98 households in Canton were denied (11.9%). Denial reasons were given for 77 applications and included the following:

- Credit history: 19.4%
- Collateral: 18.4%
- Debt-to-income ratio: 18.4%
- Other: 7.7%
- Employment History: 5.1%
- Credit Application Incomplete: 4.1%
- Unverifiable information: 3.1%
- Insufficient Cash: 3.1%
- Mortgage Insurance Denied: 1.0%

Observation

Poor credit and high debt-to-income ratios were the two main reasons for mortgage denials. Even in an area with relatively affordable housing, low-moderate income households may not be able to obtain a home mortgage for these reasons.

Figure 4-28
Denials by Race and Ethnicity, 2007-2009

	2007			2008			2009		
	Total Apps**	Denials	Denial Rate	Total Apps**	Denials	Denial Rate	Total Apps**	Denials	Denial Rate
Am. Indian/Alaska Native	6	3	50.0%	3	0	0.0%	2	0	0.0%
Asian	13	2	15.4%	2	0	0.0%	1	0	0.0%
Black	168	54	32.1%	86	22	25.6%	45	9	20.0%
Hawaiian	2	0	0.0%	1	N/A	N/A	2	1	50.0%
White	1,379	201	14.6%	985	125	12.7%	736	81	11.0%
Not Provided	106	40	37.7%	84	12	14.3%	35	7	20.0%
Hispanic*	22	6	27.3%	8	1	12.5%	12	3	25.0%

* Hispanic ethnicity is counted independently of race.
**Total applications do not include loans purchased by another institution

Between 2007 and 2009, the denial rates for both Black and White applicants decreased. However, for each of the three years the denial rate was twice as high for Black applicants as for Whites. The number of applications submitted by other racial and ethnic groups is too small to reliably analyze the denial rate.

Observation

While mortgage denial rates for Black applicants in Canton decreased from 32.1% in 2007 to 20.0% in 2009, the denial rate for Black applicants continues to be twice the rate of White applicants.

In 2009, the denial rate for Whites was 11.0%.

For this analysis, lower-income households include those with incomes between 0%-80% of MFI, while upper-income households include households with incomes above 80% MFI.

In 2007, the denial rate for lower-income households was 21.3% versus 14.2% for upper-income households. Lower-income households represented 59.3% of all denials, despite comprising only 49.8% of all applications. Although the denial rate for both groups fell in 2008, the disparity only widened with an 18.2% denial rate for lower-income households versus 8.5% for upper-income households. However, in 2009 the gap closed considerably, with the denial rate for upper-income applicants rising to 11.4% and the denial rate for lower-income applicants decreasing to 12.3%. Lower-income applicants represented 63.5% of applications and 65.3% of denials in 2009.

Figure 4-29
Denials by Income, 2007-2009

	2007			2008			2009		
	Total Apps**	Denials	Denial Rate	Total Apps**	Denials	Denial Rate	Total Apps**	Denials	Denial Rate
Below 80% MFI	834	178	21.3%	603	110	18.2%	521	64	12.3%
At least 80% MFI	808	115	14.2%	542	46	8.5%	290	33	11.4%
Total	1674	300	17.9%	1161	159	13.7%	821	98	11.9%

Note: Total includes applications for which no income data was reported
*Total applications do not include loans purchased by other institutions

Among lower-income households, denial rates declined through all three years for both Black and White applicants. However, denial rates were consistently higher for lower-income Black applicants than lower-income White applicants. In 2009, a quarter of all applications submitted by lower-income Blacks were denied compared to 10.7% of lower-income White applicants. The number of applications from other racial and ethnic minority groups is too small to reliably analyze by income group.

Figure 4-30
Denials by Race for Lower-income Applicants, 2007-2009

	2007			2008			2009		
	Total Apps**	Denials	Denial Rate	Total Apps**	Denials	Denial Rate	Total Apps**	Denials	Denial Rate
Am. Indian/Alaska Native	3	2	66.7%	1	0	0.0%	1	0	0.0%
Asian	4	0	0.0%	0	N/A	N/A	1	0	0.0%
Black	93	33	35.5%	48	15	31.3%	31	8	25.8%
Haw aiian	1	0	0.0%	0	N/A	N/A	2	1	50.0%
White	677	118	17.4%	514	89	17.3%	466	50	10.7%
Not Provided	56	25	44.6%	40	6	15.0%	20	5	25.0%
Hispanic**	8	3	37.5%	4	0	0.0%	7	2	28.6%
Total	834	178	21.3%	603	110	18.2%	521	64	12.3%

*Total applications do not include loans purchased by another institution
**Hispanic ethnicity is counted independently of race.

For both Black and White applicants, denial rates were lower for upper-income households than for lower-income households. In 2007 and 2008 upper-income Black applicants had a higher denial rate than Whites; however, this was reversed in 2009. In 2007, the denial rate for upper-income Whites was 11.4%. For upper-income Blacks it was 27.8%. This was higher than the rate for lower-income Whites (17.4%). In 2009, the denial rate for upper-income Whites was 11.5% versus 7.1% for upper-income Blacks. However, it should be noted that because of decreasing overall applications, by 2009 the number of applications from upper-income Blacks was extremely small: 14 in 2009 versus 72 in 2007.

Figure 4-31
Denials by Race for Upper-income Applicants, 2007-2009

	2007			2008			2009		
	Total Apps**	Denials	Denial Rate	Total Apps**	Denials	Denial Rate	Total Apps**	Denials	Denial Rate
Am. Indian/Alaska Native	3	1	33.3%	2	0	0.0%	1	0	0.0%
Asian	8	2	25.0%	2	0	0.0%	0	N/A	N/A
Black	72	20	27.8%	36	7	19.4%	14	1	7.1%
Haw aiian	1	0	0.0%	1	0	0.0%	0	N/A	N/A
White	676	77	11.4%	460	34	7.4%	260	30	11.5%
Not Provided	48	15	31.3%	41	5	12.2%	15	2	13.3%
Hispanic**	12	3	25.0%	4	1	25.0%	5	1	20.0%
Total	808	115	14.2%	542	46	8.5%	290	33	11.4%

*Total applications do not include loans purchased by another institution
**Hispanic ethnicity is counted independently of race.

ii. High-Cost Lending Practices

The widespread housing finance market crisis of recent years has brought a new level of public attention to lending practices that victimize vulnerable populations. Subprime lending, designed for borrowers who are considered a credit risk, has increased the availability of credit to low-income persons. At the same time, subprime lending has often exploited borrowers, piling on excessive fees, penalties and interest rates that make financial stability difficult to achieve. Higher monthly mortgage payments make housing less affordable, increasing the risk of mortgage delinquency and foreclosure and the likelihood that properties will fall into disrepair.

Some subprime borrowers have credit scores, income levels and down payments high enough to qualify for conventional, prime loans, but are nonetheless steered toward more expensive subprime mortgages. This is especially true of minority groups, which tend to fall disproportionately into the category of subprime borrowers. The practice of targeting minorities for subprime lending qualifies as mortgage discrimination.

Since 2005, Housing Mortgage Disclosure Act data has included price information for loans priced above reporting thresholds set by the Federal Reserve Board. This data is provided by lenders via Loan Application Registers and can be aggregated to complete an analysis of loans by lender or for a specified geographic area. HMDA does not require lenders to report credit scores for applicants, so the data does not indicate which loans are subprime. It does, however, provide price information for loans considered "high-cost."

A loan is considered high-cost if it meets one of the following criteria:

- A first-lien loan with an interest rate at least three percentage points higher than the prevailing U.S. Treasury standard at the time the loan application was filed. The standard is equal to the current price of comparable-maturity Treasury securities.
- A second-lien loan with an interest rate at least five percentage points higher than the standard.

Not all loans carrying high APRs are subprime, and not all subprime loans carry high APRs. However, high-cost lending is a strong predictor of subprime lending, and it can also indicate a loan that applies a heavy cost burden on the borrower, increasing the risk of mortgage delinquency.

a. Home Purchase Loans

In 2009, there were 639 home purchase loans made for single-family or manufactured housing units in Canton. Of this total, 633 disclosed the borrower's household income and 69 (10.9%) reported high-cost mortgages. For both lower- and upper-income households, high-cost loans decreased as a proportion of loan originations between 2007 and 2009. This could be due to policy changes that have limited subprime lending and/or to the necessity for lenders to make rates more competitive as the total number of applications dropped. Overall, lower-income households were more likely to have high-cost mortgages than upper-income households.

Blacks tended to have high-cost loans more than Whites. Across the three years analyzed, 31.5% of lower-income Blacks received a high-cost loan compared to 17.8% of lower-income White households. Similarly, among upper-income households, 22.7% of Blacks had a high cost loan compared to 11.2% of Whites.

Figure 4-32
High-Cost Home Purchase Loans by Race/Ethnicity and Income, 2007-2009

		Lower Income			Upper Income		
		Total Originations	High-Cost	% High-Cost	Total Originations	High-Cost	% High-Cost
2007	Am. Indian/Alaska Native	1	0	N/A	2	0	0.0%
	Asian	4	1	25.0%	4	0	0.0%
	Black	49	17	34.7%	39	13	33.3%
	Hawaiian	1	0	0.0%	1	0	0.0%
	White	475	97	20.4%	527	58	11.0%
	No information/NA	20	2	10.0%	21	7	33.3%
	Hispanic*	5	1	20.0%	8	1	12.5%
	Total	**550**	**117**	**21.3%**	**594**	**78**	**13.1%**
2008	Am. Indian/Alaska Native	1	0	0.0%	2	1	N/A
	Asian	0	N/A	N/A	2	0	0.0%
	Black	25	7	28.0%	26	2	7.7%
	Hawaiian	0	N/A	N/A	1	0	N/A
	White	362	76	21.0%	367	47	12.8%
	No information/NA	26	9	34.6%	24	3	12.5%
	Hispanic*	2	0	0.0%	3	0	0.0%
	Total	**414**	**92**	**22.2%**	**422**	**53**	**12.6%**
2009	Am. Indian/Alaska Native	0	N/A	N/A	1	0	0.0%
	Asian	1	0	0.0%	0	N/A	N/A
	Black	18	5	27.8%	10	2	20.0%
	Hawaiian	0	N/A	N/A	0	N/A	N/A
	White	369	42	11.4%	212	19	9.0%
	No information/NA	13	0	0.0%	9	1	11.1%
	Hispanic*	4	2	50.0%	3	0	0.0%
	Total	**401**	**47**	**11.7%**	**232**	**22**	**9.5%**
Three-Year Totals		**1,365**	**256**	**18.8%**	**1,248**	**153**	**12.3%**

Note: Does not include loans for which no income data was reported: 19 in 2007, 10 in 2008 and 6 in 2009.
* Hispanic ethnicity is counted independently of race.

Observation

Black households are disproportionately represented among recipients of high-cost home purchase loans.

Among all Blacks with mortgages between 2007 and 2009, 27.5% had high-cost loans. By comparison, only 14.7% of Whites had high-cost home purchase loans. This trend places the homes of minority households at greater risk for eviction, foreclosure, and bankruptcy.

b. Refinancing Loans

This analysis also looks at high-cost lending among refinancing loans. A refinanced loan replaces an original mortgage and allows borrowers to take advantage of lower rates, switch from a variable to a fixed-rate mortgage, consolidate debt, and/or receive cash using the home's equity.

In Canton in 2009, there were 917 refinancing loans and 867 for which income was reported. Of these, 133 (15.3%) were high-cost loans.

Similar to home purchase loans, Blacks tend to be over-represented in high-cost refinancing. Among refinancing loans from 2007 and 2009, 64.3% of lower-income Blacks had a high-cost loan compared to 38.3% of lower-income White households. Similarly, among upper-income households, 50.0% of Blacks had a high cost loan compared to 21.3% of Whites.

Lower-income households in general were also overrepresented. Over the three-year period, 41.5% of all lower-income households had a high-cost loan in comparison to 23.2% of upper-income households. Also notable is that high-cost refinancing loans have been decreasing steadily for upper-income households, falling from 29.5% to 13.5% in 2009. Lower-income households, on the other hand, experienced a sharp increase in high-cost loans from 2007 to 2008, from 36.1% of all refinancing loans to 53.2%. The rates decreased in 2009, but at 38.5%, the rate is still higher than in 2007.

Figure 4-33
High-Cost Refinancing Loans by Race/Ethnicity and Income, 2007-2009

		Lower Income			Upper Income		
		Total Originations	High-Cost	% High-Cost	Total Originations	High-Cost	% High-Cost
2007	Am. Indian/Alaska Native	2	1	50.0%	0	N/A	N/A
	Asian	0	N/A	N/A	2	0	0.0%
	Black	13	5	38.5%	82	49	59.8%
	Hawaiian	0	N/A	N/A	1	0	0.0%
	White	77	27	35.1%	926	249	26.9%
	No information/NA	5	2	40.0%	92	27	29.3%
	Hispanic*	0	N/A	N/A	11	2	18.2%
	Total	**97**	**35**	**36.1%**	**1,103**	**325**	**29.5%**
2008	Am. Indian/Alaska Native	0	N/A	N/A	3	1	33.3%
	Asian	0	N/A	N/A	0	N/A	N/A
	Black	10	9	90.0%	44	20	45.5%
	Hawaiian	0	N/A	N/A	1	0	0.0%
	White	49	22	44.9%	606	134	22.1%
	No information/NA	3	2	66.7%	45	15	33.3%
	Hispanic*	1	1	100.0%	3	2	66.7%
	Total	**62**	**33**	**53.2%**	**699**	**170**	**24.3%**
2009	Am. Indian/Alaska Native	0	N/A	N/A	1	0	0.0%
	Asian	0	N/A	N/A	6	0	0.0%
	Black	5	4	80.0%	34	11	32.4%
	Hawaiian	0	N/A	N/A	2	1	50.0%
	White	54	20	37.0%	682	89	13.0%
	No information/NA	6	1	16.7%	77	7	9.1%
	Hispanic*	2	1	50.0%	8	3	37.5%
	Total	**65**	**25**	**38.5%**	**802**	**108**	**13.5%**
Three-Year Totals		**224**	**93**	**41.5%**	**2,604**	**603**	**23.2%**

Note: Does not include loans for which no income data was reported: 24 in 2007, 67 in 2008 and 150 in 2009.
* Hispanic ethnicity is counted independently of race.

E. Assessment of Current Fair Housing Policies, Programs, and Activities

i. Progress since Previous AI

The last AI for the ACMS region was completed in 2002. Seven region-wide impediments were identified in this study, including:

- Lack of knowledge about fair housing laws and enforcement,
- Insurance companies provide limited services or refuse to insure properties in older or less desirable neighborhoods,
- Segregated housing patterns,
- Difficulty finding landlords who accept Section 8 Vouchers,
- Limited funding that restricts the Section 8 program,
- Developers and builders who are not complying with multi-family accessibility provisions,
- Housing in need of major repairs, which LMI households cannot afford, and
- Minorities tend not to purchase outside of impacted areas and non-minorities do not pursue housing opportunities in neighborhoods that are predominately minority.

Canton's actions to address these impediments, as identified in the City's CAPER reports, have primarily taken the form of developing an in-house fair housing program through HUD's Fair Housing Assistance Program. In 2006, HUD deemed the City's fair housing ordinance to be substantially equivalent to the Fair Housing Act and granted the City funds to undertake enforcement and related activities. In 2008, the City created a Department of Compliance to oversee the Fair Housing Assistance Program, MBE/MBW program, Equal Employment Opportunity (EEO) operations and minority recruitment for the City's safety forces. Staff members continue to train in fair housing issues and provide education and outreach to community members.

Observation

The City should more specifically document actions to address identified impediments.

Canton has created programs to advance fair housing choice in the City, but the CAPER does not specifically relate activities to the impediments identified in the last AI. In future CAPERs, the City should explain how its fair housing programs work to address each impediment to fair housing choice.

ii. Current Fair Housing Programs and Activities

Education and outreach regarding fair housing are primary activities undertaken by the City. The City recognizes April as the National Fair Housing Month and coordinates a series of outreach activities, including CDBG week, student essay and coloring contests, an annual fair housing open mike night, and community meetings on affirmatively furthering fair housing. Throughout the year, City staff distributes informational brochures at events such as Back to School events, City budget meetings, and a Body and Soul Wellness Fair and conducts a variety of fair housing presentations at Goodwill parenting classes, local rental developments, and for local landlords and realtors. Canton also hosts an annual fair housing luncheon.

Since 2008, the City has received FHAP assistance from HUD, which allows the City to receive and investigate complaints of housing discrimination. Under Canton's Fair Housing Code, persons found to have engaged in discriminatory acts may be assessed a civil penalty.

F. General Fair Housing Observations

This section of the AI is a summary of general observations included in earlier sections of the report. General observations include the results of primary and secondary research that define the underlying conditions, trends, and context for fair housing planning in Canton. These observations in and of themselves do not necessarily constitute impediments to fair housing choice. Rather, they establish a contextual framework for the impediments to fair housing choice that are presented in the following section of the AI.

i. Demographics and Income

a. **Minorities increased from 19.3% to 26.1% of the total population between 1990 and 2009.** Blacks remain the largest minority group, Hispanics, multi-racial persons and persons of all other races represent a growing segment of the population.

b. **There are eight areas of minority concentration of Black residents in Canton.** These include areas where the percentage of Blacks is 31% or higher, specifically tracts 7001, 7003, 7005, 7018, 7021, 7023, 7024 and 7031.

c. **Canton is a moderately segregated city.** According to dissimilarity index data, 50% of Black persons would have to move to a different location in Canton in order to achieve full integration.

d. **Blacks experienced poverty at twice the rate of Whites in Canton in 2000.** In 2000, Blacks and Hispanics had poverty rates of 32.4% and 26.9%, respectively, compared to 14.8% for Whites. In 2008, median household income for Blacks was half of that for Whites, and almost one-half of Blacks were living in poverty. Consequently, Black households will have a more difficult time finding affordable housing.

e. **Of the 38 low and moderate income census block groups in Canton, 15 are located within impacted areas of Black residents.**

f. **Persons with disabilities were more likely to live in poverty than persons without disabilities.** Among all persons with a disability in 2000, 25.2% lived in poverty, compared to 15.8% of persons without disabilities.

g. **Female-headed households with children were more likely to live in poverty.** Female-headed households with children accounted for more than half of all families living in poverty. Consequently, securing affordable housing will be especially difficult for this segment of the population.

h. **Blacks were almost three times as likely to be unemployed as Whites in 2008.** One-quarter of Blacks were unemployed in 2008 compared to 9% of Whites. Higher unemployment, whether temporary or permanent, will mean less disposable income for housing expenses.

ii. Housing

a. **Between January 2007 and June 2008, Canton had a foreclosure rate of 12.3%.** Six of the eight areas of concentration of Black residents had foreclosure rates higher than that of the City.

b. **Lower household incomes among Blacks in Canton are reflected in lower home ownership rates when compared to Whites.** Among Black households, 43.9% were home owners, compared to 65.5% of White households

c. **Black households were much more likely to live in larger families than White households.** Almost two-thirds of Black families had three or more persons compared to 55.8% of White families. However, only 29.5% of the rental housing stock contains three or more bedrooms compared to 76.3% of the owner housing stock.

d. **Canton lost almost 2,300 units renting for less than $500 between 2000 and 2008.** By comparison, units renting for more than $1,000 increased over 500%, from 160 to 972.

e. **Minimum-wage and single-income households cannot afford a housing unit renting for the HUD fair market rent in Alliance and Stark County.** Minorities and female-headed households will be disproportionately impacted because of their lower incomes.

f. **Persons with disabilities receiving a monthly SSI check of $674 as their sole source of income cannot afford a one-bedroom unit renting at the fair market rate of $510.**

g. **Black households have significantly fewer options when purchasing a home compared to Whites, Asians and Hispanics.** Lower household incomes among Blacks are insufficient to purchase a home selling for the average sales price in Canton.

h. **Lower-income Black home owners experienced housing problems at greater rates than White and Hispanic home owners.** Among owner households, 47.2% of Blacks experienced housing problems, compared to 38.5% of Whites and 37.8% of Hispanics.

G. Potential Impediments and Recommendations

i. Public Sector

a. The Southeast area of the City, which consists nearly exclusively of areas of Black concentration, is becoming increasingly isolated from amenities and services.

This section of the City generally lacks industry, retail and jobs, in addition to basic neighborhood features such as gas stations and grocery stores. City staff members have noted a dearth of new investment. The realignment of Route 30 will likely have the effect of further isolating the Southeast side of the City from other areas.

Recommended Action Step: The City should continue to invest CDBG funds and other available resources in the revitalization of these areas, with a goal of targeting economic development in the most viable neighborhoods. The ultimate aim of these efforts would be the encouragement of private development in housing and job creation. Attracting a racial balance will require these neighborhoods to provide educational, recreational, employment and affordable housing opportunities.

Recommended Action Step: In order to mitigate segregation, the City should increase efforts to provide Black residents of Southeast Canton with access to housing opportunities in non-concentrated areas within and beyond the City. This could involve the creation of new housing opportunities in non-impacted neighborhoods of Canton via HOME or other resource investment; working with SMHA and Section 8 landlords to increase the mobility of voucher holder households; improved outreach and education to encourage home ownership across the City; advancing policy initiatives (such as the removal of zoning barriers or the addition of incentives) to promote the development of affordable housing in non-concentrated areas; and other methods aimed to promote integration among Canton neighborhoods.

Recommended Action Step: The current lack of nearby jobs and amenities requires residents to travel to meet basic needs. The City should continue to work with the Stark Area Regional Transportation Authority (SARTA) to evaluate the adequacy of public transit service for residents of Canton's Southeast area and advise SARTA on improvements that would more fully connect residents to opportunities in other neighborhoods.

b. **It is unclear whether the City currently provides adequate access of information and services to its growing foreign-language populations.**

The City must determine the need for a Language Access Plan (LAP) to assist persons with limited English proficiency (LEP) in accessing its programs and services. The City should take reasonable steps to ensure meaningful access in accordance with Executive Order 13166 of 2001 and Section V of the Federal Register, Volume 72, Number 13 on Monday, January 22, 2007.

Recommended Action Step: To determine what language assistance accommodations will need to be made, the City can complete a four-factor analysis and implementation plan (language access plan) following HUD's LEP guidance. If it is determined that a need for an LAP exists, the City must prepare the LAP to comply with Title VI of the Civil Rights Act of 1964. This analysis could be completed on a regional basis and coordinated by SCRPC.

c. **The City's affirmative marketing policy could be broadened to further ensure that City-supported affordable housing opportunities are made available to members of the protected classes.**

Canton's Affirmative Marketing Policy appears to be comprehensive; however, the City could further improve the policy by expanding its applicability to also include housing with five or more units assisted by CDBG or other City funds. Additionally, the Policy should address outreach to persons with limited English proficiency.

Recommended Action Step: Amend the Affirmative Marketing Policy to apply to all City-supported housing projects with five or more units, including CDBG investments as well as those funded through HOME and other City funds. Amend the Policy to address outreach to persons with limited English proficiency.

d. **The amount of land available and zoned for the development of multi-family housing in Canton is limited.**

While the zoning code does not contain undue requirements that expressly limit the development of multi-family housing, it also does not provide adequately for this use. Because multi-family housing is an affordable housing option, there must be parcels of land zoned for multi-family use and available for development and/or redevelopment.

Recommended Action Step: Amend the zoning ordinance and map and the City's future land use plans to ensure that opportunities are provided for the development and redevelopment of affordable housing, particularly multi-family rental units.

e. **The zoning ordinance places undue restrictions on the location of group homes for persons with disabilities, a policy that is inconsistent with the provisions of the Fair Housing Act.**

In Canton, group homes with four or more residents are conditionally permitted in multi-family districts and are not permitted in single-family districts. Conditionally permitted land uses require a public hearing, which can subject an applicant to "not in my backyard" opposition from neighbors and elected officials. Generally speaking, group homes with up to eight residents should be permitted by-right in residential zoning districts where single-family dwelling units are permitted by-right.

In addition, the City should distinguish between group homes for persons with disabilities as defined by the Fair Housing Act and other types of group living arrangements (i.e. homes for juvenile offenders, etc). Persons with disabilities are clearly defined in the federal law and are members of a protected class, whereas released offenders, etc. may not be.

Finally, by amending its zoning ordinance to include the term "persons with disabilities," the City can eliminate outdated and offensive phrases (i.e. "mentally retarded").

Recommended Action Step: Amend the zoning ordinance to allow group homes for persons with disabilities to locate and function under the same rules that govern single-family dwellilng units. Additionally, amend the ordinance to replace outdated terminology.

f. **Some improvements could be made to City policy documents, from a fair housing perspective.**

The Consolidated Plan and Annual Action Plan do not establish a definition for areas of minority concentration, and each year's CAPER could include a more specific relation between identified impediments and fair housing actions to address them.

Recommended Action Step: Amend the Consolidated Plan to include a definition for areas of minority concentration. Carry the definition through in Annual Action Plans, using the definition as a frame of reference for balancing entitlement spending between the revitalization of impacted areas and the creation of new housing opportunities in non-impacted areas.

Recommended Action Step: In future CAPERs, identify fair housing actions undertaken during the program year in the context of addressing impediments identified in the AI.

ii. Private Sector

a. **Patterns of mortgage lending discrimination evidently endure in Canton.** While mortgage denial rates for Black applicants decreased from 32.1% in 2007 to 20.0% in 2009, the denial rate for Black applicants continues to be twice the rate of White applicants. Among all Blacks with mortgages between 2007 and 2009, 27.5% had high-cost loans. By comparison, only 14.7% of Whites had high-cost home purchase loans. This trend places the homes of minority households at greater risk for eviction, foreclosure, and bankruptcy.

Recommended Action Step: Arrange housing counselors to provide credit repair advice on a public basis in order to ensure to the extent possible that members of the protected classes have access to means of improving their ability to obtain and maintain decent, affordable housing.

H. Fair Housing Action Plan

	Planned Action Year					Responsible Entity
	2012	2013	2014	2015	2016	
Address the increasing isolation of the City's Southeast area						
Continue to invest CDBG funds and other available resources in the revitalization of this area w ith a goal of targeting economic development in the most viable neighborhoods.	•	•	•	•	•	
Increase efforts to provide Black residents of Southeast Canton w ith access to housing opportunities in non-impacted areas w ithin and beyond the City. This could include the creation of new housing opportunities via HOME or other investment, w orking w ith SMHA and Section 8 landlords to increase mobility for voucher holders, improved outreach and education to encourage home ow nership across the City, advancing policy initiatives to promote the development of affordable housing in non-impacted areas and/or other methods of improving integration.	•	•	•	•	•	
Continue to w ork w ith SARTA to evaluate the adequacy of public transit service for residents of Canton's Southeast area, advise SARTA on improvements that w ould more fully connect residents to opportunities in other neighborhoods.	•	•	•	•	•	
Amend policy and program documents to affirmatively further fair housing						
Conduct the four-factor analysis outlined at w w w .lep.gov to determine the extent to w hich the translation of vital documents is necessary to assist persons w ith limited English proficiency in accessing County programs and services.	•					SCRPC
Amend the Affirmative Marketing Policy to apply to all City-supported housing projects w ith five or more units, including CDBG as w ell as HOME investments. Amend the policy to address outreach to persons w ith limited English proficiency.	•					
Amend the zoning ordinance and map for the City's future land use plans to ensure that opportunities are provided for the development and redevelopment of affordable housing, particularly multi-family rental units.			•			

cont'd …

	Planned Action Year					
	2012	2013	2014	2015	2016	Responsible Entity
Amend the zoning ordinance to allow group homes for persons with disabilities to locate and function under the same rules that govern single-family dwelling units. Additionally, amend the ordinance to replace outdated terminology.		•				
Amend the Consolidated Plan to include a definition of areas of minority concentration. Carry the definition through each Annual Action Plan, using it as a frame of reference for balancing entitlement spending between the revitalization of impacted areas and the creation of new housing opportunities in non-impacted areas.	•					
In future CAPERs, identify fair housing actions undertaken during the program year in the context of addressing impediments identified in the AI.	•	•	•	•	•	
Increase community involvement and awareness of fair housing issues						
Arrange housing counselors to provide credit repair advice on a public basis in order to ensure to the extent possible that members of the protected classes have access to means of improving their ability to obtain and maintain decent, affordable housing.	•	•	•	•	•	
Continue educational and outreach efforts to broaden awareness of rights and responsibilities under the Fair Housing Act.	•	•	•	•	•	

I. Signature Page for the City of Canton

By my signature I certify that the Analysis of Impediments to Fair Housing Choice for the City of Canton is in compliance with the intent and directives of the regulations of the Community Development Block Grant Program and HOME Investment Partnerships Program.

____

(Signature of Authorizing Official)

____

Date

5. City of Massillon

A. Demographic Profile

i. Population Trends

Massillon's total population remained relatively stable between 1990 and 2010, decreasing only 0.8%. During this time, the racial composition of the City has shifted slightly. The White population decreased 3.5%, while the non-White population increased 22.7%. Whereas non-White residents comprised 10.1% of the total population in 1990, by 2010 their population share had increased to 12.5%

Among non-White residents, diversity has increased. In 1990, Blacks comprised 94.2% of the non-White population compared to 78.6% in 2010. Asian/Pacific Islanders and persons of two or more races experienced the greatest growth during this period. The Asian/Pacific Islander population tripled, and by 2010, persons of two or more races comprised 13.7% of the non-White population.

The Hispanic population grew 43.3% between 1990 and 2010 and accounted for 1.2% of Massillon's population in 2010.

Figure 5-1
Population Trends, 1990-2010

	1990		2000		2010		% Change
	#	%	#	%	#	%	1990-2010
Massillon City	**31,007**	**100.0%**	**31,384**	**100.0%**	**30,751**	**100.0%**	**-0.8%**
White Population	27,875	89.9%	27,741	88.4%	26,907	87.5%	-3.5%
Non-White Population	3,132	10.1%	3,643	11.6%	3,844	12.5%	22.7%
Black	2,951	9.5%	2,932	9.3%	3,021	9.8%	2.4%
Amer. Indian/Alaska Native	66	0.2%	53	0.2%	68	0.2%	3.0%
Asian / Pacific Islander	42	0.1%	111	0.4%	124	0.4%	195.2%
Some Other Race	73	0.2%	85	0.3%	105	0.3%	43.8%
Two or More Races	---	---	462	1.5%	526	1.7%	13.9%
Hispanic	247	0.8%	342	1.1%	354	1.2%	43.3%

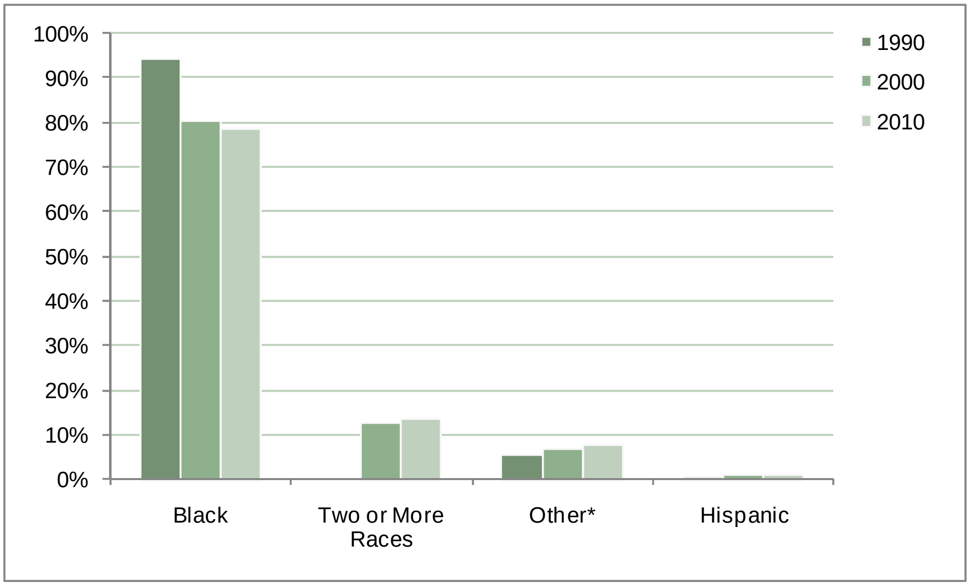
Source: U.S. Census Bureau, DemographicsNow

Observation

Minorities increased from 10.1% to 12.5% of the total population between 1990 and 2010.

Blacks remain the largest minority group. However, the fastest growing segment of the population has been Asian/Pacific Islanders, which tripled during this period.

Figure 5-2
Changes in the Racial and Ethnic Characteristics of the Minority Population, 1990-2010



*Other includes Alaska Natives/American Indians, Asian/Pacific Islanders and Persons of Some Other Race

ii. Areas of Racial and Ethnic Minority Concentration

The City's Five-Year Consolidated Plan does not set a specific threshold to define areas of racial or ethnic minority concentration, though it identifies certain census tracts as priority areas on the basis of relatively higher proportions of poverty and minority residents. These tracts include 7138, 7142, 7143.01 and 7144, along with portions of tracts 7137, 7141 and 7143.02.

In the absence of specific definitions for "area of racial or ethnic concentration" in consolidated planning documents for each of the Stark County Consortium jurisdictions, a generally accepted definition is applied throughout the AI: Concentrated geographical areas are those within a city where the percentage of a specific minority or ethnic group is 10 percentage points higher than in the city overall.

In Massillon, Blacks comprised 8.7% of the population in 2009.[33] Therefore, an area of racial concentration would include any census tract where the percentage of Black residents is 18.7% or higher. Only one tract, 7142, qualified by this definition. No other racial or ethnic minority group met the criterion for an area of concentration. However, in census tract 7143.01, Hispanics accounted for 7.5% of the population, which was nearly six times as great as the percentage of Hispanics across the entire City.

[33] American Community Survey 2005-2009 estimates were used to update Census 2000 data. The City is advised to use Census 2010, when available, to recalculate areas of minority concentration.

Observation

There is one area of minority concentration of Black residents in Massillon.

Census tract 7142, where the percentage of Black residents is 38.3%, qualifies as an area of minority concentration. Additionally, tract 7143.01 has a relatively high proportion of Hispanic residents.

Figure 5-3
Census Tract Population by Race and Hispanic Origin, 2009

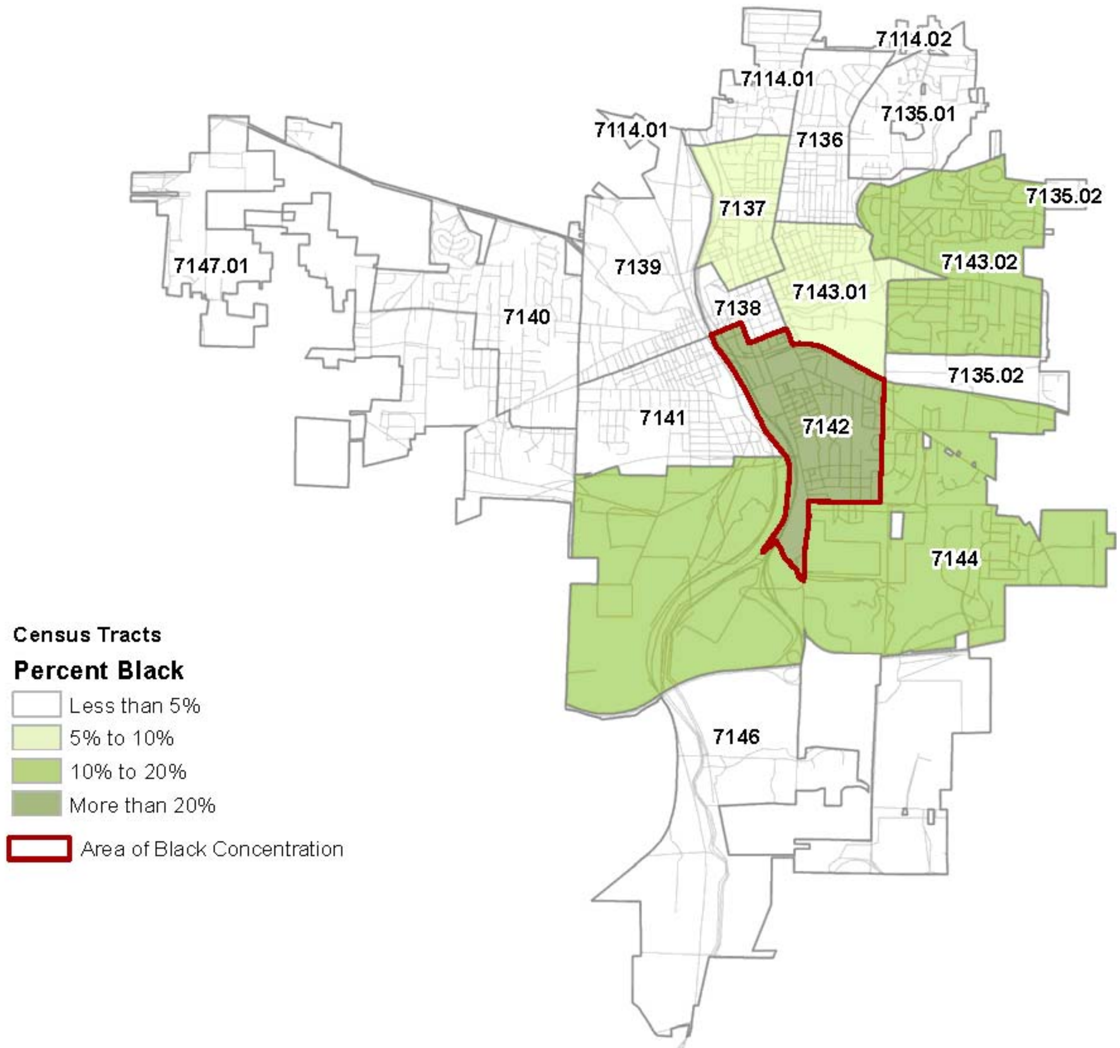
Census Tract	Total Population	White %	Minority Residents Black %	Asian %	Hispanic %
Massillon	**32,521**	**88.7%**	**8.7%**	**0.1%**	**1.3%**
7114.01*	2,011	97.2%	2.1%	0.0%	1.2%
7114.02*	0	---	---	---	---
7135.01*	1,272	93.1%	4.9%	1.3%	1.8%
7135.02*	182	100.0%	0.0%	0.0%	0.0%
7136	2,687	94.6%	4.2%	0.0%	0.0%
7137	2,438	83.7%	9.8%	0.0%	0.0%
7138	227	100.0%	0.0%	0.0%	0.0%
7139*	1,842	100.0%	0.0%	0.0%	0.0%
7140*	3,816	98.1%	1.9%	0.0%	0.0%
7141	3,260	94.7%	4.9%	0.0%	0.0%
7142	2,677	57.1%	38.3%	0.0%	1.1%
7143.01	2,910	84.3%	8.0%	0.0%	7.5%
7143.02*	3,831	87.2%	12.5%	0.0%	2.7%
7144*	2,777	78.7%	14.6%	0.0%	0.7%
7146*	47	100.0%	0.0%	0.0%	0.0%
7147.01*	2,544	100.0%	0.0%	0.0%	0.0%

**Data in starred census tracts reflects only the parts of the tracts within the City of Massillon.*

Source: U.S. Census Bureau

Figure 5-4 depicts the geographic location of the area of racial concentration. In Massillon, tract 7142, outlined in *red,* is an area of concentration of Black residents. This concentration is also referred to as an impacted area. It is within this framework that other demographic characteristics—such as income and housing—will be analyzed.

Figure 5-4
Map: Area of Racial Concentration, 2009



iii. Residential Segregation Patterns

Residential segregation is a measure of the degree of separation of racial or ethnic groups living in a neighborhood or community. Typically, the pattern of residential segregation involves the existence of predominantly homogenous, White suburban communities and low-income minority inner-city neighborhoods. A potential impediment to fair housing is created where either latent factors, such as attitudes, or overt factors, such as real estate practices, limit the range of housing opportunities for minorities. A lack of racial or ethnic integration in a community creates other problems, such as reinforcing prejudicial attitudes and behaviors, narrowing opportunities for interaction, and reducing the degree to which community life is considered harmonious. Areas of extreme minority isolation often experience poverty and social problems at rates that are disproportionately high. Racial segregation has been linked to diminished employment prospects, poor educational attainment, increased infant and adult mortality rates and increased homicide rates.

The distribution of racial or ethnic groups across a geographic area can be analyzed using an index of dissimilarity. This method allows for comparisons between subpopulations, indicating how much one group is spatially separated from another within a community. The index of dissimilarity is rated on a scale from 0 to 100, in which a score of 0 corresponds to perfect integration and a score of 100 represents total segregation.[34] The index is typically interpreted as the percentage of the minority population (in this instance, the Black population) that would have to move in order for a community or neighborhood to achieve full integration. A dissimilarity index of less than 30 indicates a low degree of segregation, while values between 30 and 60 indicate moderate segregation, and values above 60 indicate high segregation.

Figure 5-5 details the dissimilarity indices for metropolitan areas throughout Ohio. With a dissimilarity index of 56.6, Massillon ranks 13th out of 56 municipalities. It is the most segregated municipality among those covered in this regional AI. The data indicates that in order to achieve full integration among White and Black residents, 56.6% of Blacks would have to move to another area within Massillon.

[34] The index of dissimilarity is a commonly used demographic tool for measuring inequality. For a given geographic area, the index is equal to **1/2 Σ ABS [(b/B)-(a/A)]**, where b is the subgroup population of a census tract, B is the total subgroup population in a city, a is the majority population of a census tract, and A is the total majority population in the city. ABS refers to the absolute value of the calculation that follows.

Figure 5-5
Ohio Municipal Dissimilarity Index Rankings, 2000

Rank	City	Black Population	White Population	Total Population	Dissimilarity Index
1	Garfield Heights	5,143	24,577	30,734	80.7
2	Cleveland	241,512	185,641	478,403	79.4
3	Dayton	71,291	87,487	166,179	78.3
4	Hamilton	4,562	53,386	60,690	68.7
5	Toledo	73,134	212,658	313,619	67.0
6	Barberton	1,482	25,662	27,899	65.9
7	Youngstown	35,440	40,100	82,026	64.2
8	Cincinnati	141,534	173,781	331,285	63.0
9	Akron	61,510	144,719	217,074	61.5
10	Columbus	172,750	475,897	711,470	61.0
11	Springfield	11832	50,663	65,358	60.6
12	Middletown	5,447	44,658	51,605	59.6
13	**Massillon**	**2,934**	**27,422**	**31,325**	**56.6**
14	Euclid	16,038	34,678	52,717	56.2
15	East Cleveland	25,291	1,219	27,217	55.6
20	Medina	687	23,607	25,139	51.0
21	Cleveland Heights	20,752	25,840	49,958	50.3
22	Canton	16,875	59,653	80,806	50.0
23	Cuyahoga Falls	918	47,102	49,374	48.6
24	Marion	2,465	31,658	35,318	48.4
25	Alliance	2,287	20,099	23,458	48.0
52	Strongsville	533	40,929	43,858	23.8
53	Beavercreek	537	35,190	37,984	21.1
54	Gahanna	2,636	27,966	32,636	19.5
55	Dublin	527	27,901	31,392	18.8
56	Huber Heights	3,703	32,075	38,212	18.6

Source: CensusScope

Observation

Massillon is a moderately segregated city.

According to dissimilarity index data, 56.6% of Black persons would have to move to a different location in Massillon in order to achieve full integration.

Dissimilarity index data for all Massillon subpopulations appears in Figure 5-6. Perfect integration would receive an index score of 0. However, indices for subpopulations other than Blacks in the City cannot be as reliably interpreted, since their populations are less than 1,000. In cases where a subgroup population is small, the dissimilarity index may be high even if the group's members are evenly dispersed.

Figure 5-6
Massillon Dissimilarity Indices, 2000

	DI with White Population**	Population	% of Total Population
White	-	27,411	87.5%
Black	**56.6**	**2,934**	**9.4%**
American Indian/Alaska Native*	39.3	68	0.2%
Asian*	48.1	79	0.3%
Other*	52.3	46	0.2%
Two or more races*	33.2	474	1.5%
Hispanic***	25.6	301	1.0%
TOTAL	-	31,313	100.0%

** In these cases, sample size is too small to reliably interpret the DI. Caution should be exercised in interpreting results for subpopulations of fewer than 1,000.*
*** Each dissimilarity index indicates the percentage of one of the two population groups compared that would have to move to different geographic locations (i.e., block groups) to create a completely even demographic distribution in the City.*
**** Hispanic ethnicity is counted independently of race*
Source: CensusScope

iv. Race/Ethnicity and Income

Household income is one of several factors used to determine a household's eligibility for a home mortgage loan or a rental lease. A review of median household income reveals a contrast between Blacks and Whites in Massillon. In 2008, Blacks had a median household income of $28,717, equivalent to 69.2% of the median income for Whites. Blacks also were more than twice as likely to be living in poverty, with a poverty rate of 35.2% compared to 11.5% for Whites. Sample sizes for Asians and Hispanics were too small to analyze

Figure 5-7
Median Household Income and Poverty Rates by Race/Ethnicity, 2008

	Median Household Income 2008	Poverty Rate 2000	Poverty Rate 2008
Massillon City	**$40,193**	**10.7%**	**14.1%**
Whites	$41,490	9.0%	11.5%
Blacks	$28,717	24.3%	35.2%

Source: U.S. Census Bureau, Census 2000, SF-3 (P87, PCT75A, PCT75B), 2006-2008 American Community Survey (B19013, B19013A, B19013B, B17001, B17001A, B17001B)

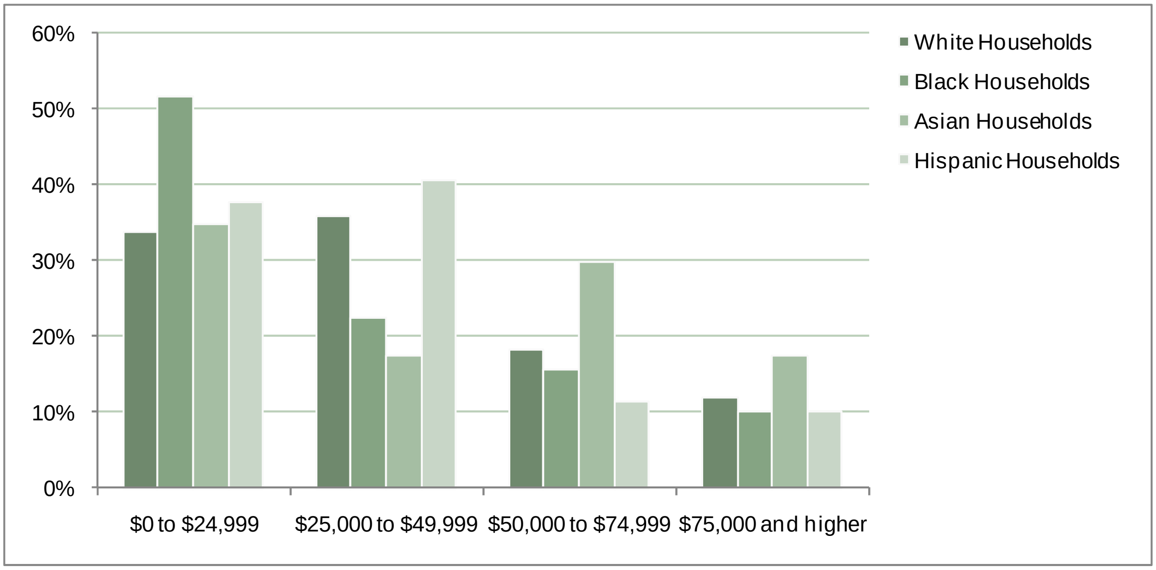
Distribution of household income by race and ethnicity is comparable to the trends described above. In 2000, over half of Black households earned less than $25,000, compared to one-third of White households. At the upper end of the spectrum, however, the disparities shrank. Among Black households, 10.0% earned more than $75,000 compared to 12.0% of White households.

Figure 5-8
Household Income Distribution by Race and Ethnicity, 2000

		$0 to $24,999		$25,000 to $49,999		$50,000 to $74,999		$75,000 and higher	
	Total	#	%	#	%	#	%	#	%
All Households	**12,720**	**4,487**	**35.3%**	**4,419**	**34.7%**	**2,314**	**18.2%**	**1,500**	**11.8%**
White Households	11,528	3,887	33.7%	4,137	35.9%	2,123	18.4%	1,381	12.0%
Black Households	1,025	530	51.7%	230	22.4%	162	15.8%	103	10.0%
Asian Households	40	14	35.0%	7	17.5%	12	30.0%	7	17.5%
Hispanic Households	69	26	37.7%	28	40.6%	8	11.6%	7	10.1%

Source: U.S. Census Bureau, Census 2000, SF-3 (P52, P151A, P151B, P151D, P151H)

Figure 5-9
Household Income Distribution by Race and Ethnicity, 2000



Observation

Blacks experienced poverty at more than twice the rate of Whites in Massillon in 2008.

Median household income for Blacks was equivalent to 69.2% of the income for Whites in 2008. Blacks also had a poverty rate of 35.2% compared to 11.5% for Whites. Consequently, Black households will have a more difficult time finding and sustaining affordable housing.

v. Concentrations of LMI Persons

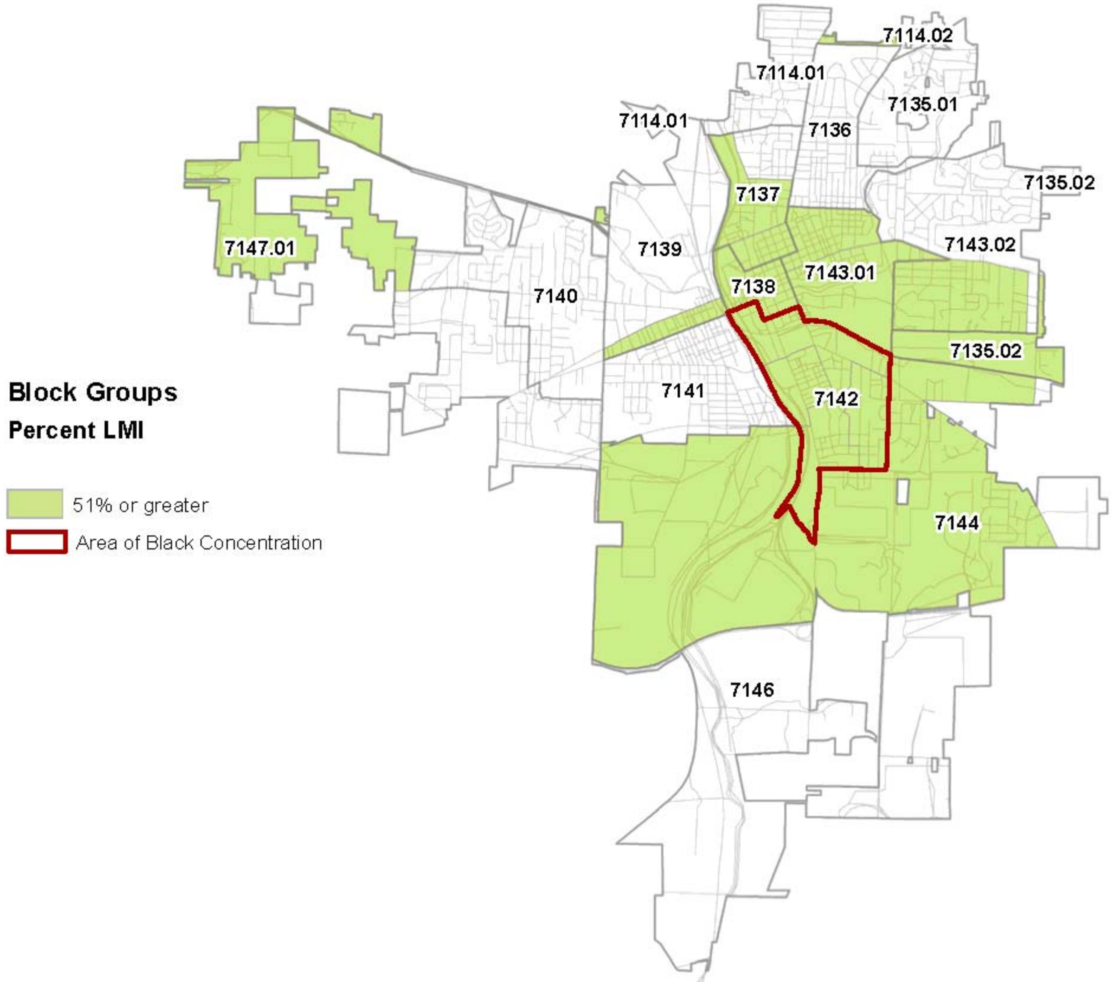
The CDBG program includes a statutory requirement that at least 70% of funds invested benefit low and moderate income (LMI) persons. As a result, HUD provides the percentage of LMI persons in each census block group for entitlements such as Massillon. HUD 2009 LMI estimates reveal that 15 of the 38 census block groups in Massillon had at least 51% of residents (for whom this rate is determined) who met the definition for LMI status, as highlighted in Figure 5-10. Of the 15 LMI block groups in Massillon, four are contained within tract 7142, previously identified as an area of Black concentration. Figure 5-11 illustrates the location of the area of racial concentration and LMI persons in Massillon.

Figure 5-10
Low and Moderate Income Persons, 2009

Census Tract	Block Group	Low and Moderate Income Persons		
		Universe	# LMI	% LMI
7114.01	1	19	0	0.00%
7114.01	3	50	36	72.00%
7114.01	4	1,850	894	48.32%
7114.02	3	0	0	---
7135.01	1	810	169	20.86%
7135.02	1	47	38	80.85%
7135.02	2	71	0	0.00%
7136.00	1	606	124	20.46%
7136.00	2	904	335	37.06%
7136.00	3	1,082	422	39.00%
7137.00	1	1,034	455	44.00%
7137.00	2	1,075	572	53.21%
7137.00	3	544	406	74.63%
7138.00	1	262	250	95.42%
7139.00	1	1,267	630	49.72%
7139.00	2	719	390	54.24%
7140.00	1	1,285	576	44.82%
7140.00	2	1,429	569	39.82%
7140.00	3	1,279	533	41.67%
7141.00	1	1,201	611	50.87%
7141.00	2	1,051	522	49.67%
7141.00	3	666	221	33.18%
7141.00	4	525	256	48.76%
7142.00	1	542	415	76.57%
7142.00	2	753	544	72.24%
7142.00	3	799	505	63.20%
7142.00	4	729	412	56.52%
7143.01	1	1,546	846	54.72%
7143.01	2	1,298	876	67.49%
7143.02	1	1,427	225	15.77%
7143.02	2	1,530	847	55.36%
7143.02	3	937	277	29.56%
7144.00	1	0	0	---
7144.00	2	1,411	836	59.25%
7146.00	2	0	0	---
7147.01	1	880	287	32.61%
7147.01	2	741	152	20.51%
7147.01	3	181	97	53.59%

Source: HUD LMI Estimates, 2009

Figure 5-11
Map: Distribution of Low and Moderate Income Persons, 2010



Observation

Of the 15 low and moderate income census tract block groups in Massillon, four are located within tract 7142, an area of concentration of Black residents. These are referred to as impacted areas.

vi. Disability and Income

As defined by the Census Bureau, a disability is a long-lasting physical, mental, or emotional condition that can make it difficult for a person to do activities such as walking, climbing stairs, dressing, bathing, learning, or remembering. This condition can also impede a person from being able to go outside the home alone or to work at a job or business.

The Fair Housing Act prohibits discrimination based on physical, mental or emotional handicap, provided "reasonable accommodation" can be made. Reasonable accommodation may include changes to address the needs of disabled persons, including adaptive structural (e.g., constructing an entrance ramp) or administrative changes (e.g., permitting the use of a service animal). In Massillon, 20.9% of the population 5 years and older reported at least on type of disability in 2000.[35]

According to the National Organization on Disabilities, a significant income gap exists for persons with disabilities, given their lower rate of employment. In Massillon, persons with disabilities are much more likely to live in poverty than persons without disabilities. In 2000, 15.4% of persons with disabilities lived in poverty compared to 8.6% of persons without disabilities who were living in poverty.[36]

Observation

Persons with disabilities were more likely to live in poverty than persons without disabilities.

Among all persons with a disability in 2000, 15.4% lived in poverty, compared to 8.6% of persons without disabilities.

vii. Familial Status and Income

The Census Bureau divides households into family and non-family households. Family households are married couple families with or without children, single-parent families and other families made up of related persons. Non-family households are either single persons living alone, or two or more non-related persons living together.

Title VIII of the Civil Rights Act of 1968 provides protection against gender discrimination in housing. Protection for families with children was added in the 1988 amendments to Title VIII. Except in limited circumstances involving elderly housing and owner-occupied buildings of one to four units, it is unlawful to refuse to rent or sell to families with children.

In Massillon, the total number of households increased 6.5% between 1990 and 2008. During the same period, the proportion of female-headed households increased from 13.0% to 15.6% of all households, and female-headed households with children increased from 7.1% to 8.5%. Married-couple family households with children declined from 22.9% to 17.5% of families, while male-headed households with children doubled from 1.3% to 2.5%.

[35] U.S. Census Bureau, Census 2000 (SF 3, P42)
[36] U.S. Census Bureau, Census 2000 (SF 3, PCT34)

Figure 5-12
Female-headed Households and Households with Children, 1990-2008

	1990		2000		2008	
	#	%	#	%	#	%
Total Households	**12,184**	**100.0%**	**12,720**	**100.0%**	**12,973**	**100.0%**
Family Households	8,534	70.0%	8,454	66.5%	8,329	64.2%
Married-couple family	6,630	54.4%	6,385	50.2%	5,718	44.1%
With Children	**2,789**	**22.9%**	**2,565**	**20.2%**	**2,274**	**17.5%**
Without Children	3,841	31.5%	3,820	30.0%	3,444	26.5%
Female-Headed Households	**1,581**	**13.0%**	**1,610**	**12.7%**	**2,028**	**15.6%**
With Children	**864**	**7.1%**	**981**	**7.7%**	**1,107**	**8.5%**
Without Children	717	5.9%	629	4.9%	921	7.1%
Male-Headed Household	323	2.7%	459	3.6%	583	4.5%
With Children	**156**	**1.3%**	**291**	**2.3%**	**330**	**2.5%**
Without Children	167	1.4%	168	1.3%	253	2.0%
Non-family and 1-person Households	3,650	30.0%	4,266	33.5%	4,644	35.8%

Sources: U.S. Census Bureau, 1990 (SFT-3, P019), Census 2000 (SF-3, P10); 2008 American Community Survey (B11001, B11003)

Female-headed households with children often experience difficulty in obtaining housing, primarily as a result of lower-incomes and the unwillingness of some landlords to rent their units to families with children. In Massillon, female-headed households with children accounted for 54.2% of families living in poverty, although they comprised only 13.2% of all families.[37] Over one-third (34.4%) of women raising children lived in poverty, compared to 21.5% of males raising children and only 5.7% of married-couple families with children.

Observation

Female-headed households with children were more likely to live in poverty.

Female-headed households with children accounted for over half of all families living in poverty. Consequently, securing affordable housing will be especially difficult for this segment of the population.

viii. Ancestry and Income

It is illegal to refuse the right to housing based on place of birth or ancestry. Census data on native and foreign-born populations in Massillon revealed that less than one percent of residents were foreign-born in 2008.[38]

Among families with children who were living with one or more foreign-born parents, 29.6% were living in households with incomes of less than 200% of the poverty

[37] U.S. Census Bureau, Census 2000 (SF3, P90)
[38] U.S. Census Bureau, 2006-2008 American Community Survey (C05002)

level. Comparatively, 39.6% of families with only native parents were living in households with incomes below 200% of the poverty level.[39]

Persons with limited English proficiency (LEP) are defined by the federal government as persons who have a limited ability to read, write, speak or understand English. HUD issued its guidelines on how to address the needs of persons with LEP in January 2007. HUD uses the prevalence of persons with LEP to identify the potential for impediments to fair housing choice due to their inability to comprehend English. Persons with LEP may encounter obstacles to fair housing by virtue of language and cultural barriers within their new environment. To assist these individuals, it is important that a community recognizes their presence and the potential for discrimination, whether intentional or inadvertent, and establishes policies to eliminate barriers. It is also incumbent upon HUD entitlement communities to determine the need for language assistance and comply with Title VI of the Civil Rights Act of 1964.

According to 2009 American Community Survey data, more than half of Massillon residents with limited English proficiency were Spanish speakers. [40]

Observation

In 2009, 170 residents spoke English less than “very well” in Massillon. Of these, 53.5% were native Spanish-speakers.

ix. Protected Class Status and Unemployment

In 2008, unemployment in Massillon was 8.8%, higher than Ohio’s rate of 7% and Stark County’s rate of 7.1%. Because of the small population of racial and ethnic minorities within the City, information was not available for any of these groups. However, because the poverty rate Blacks was more than three times the poverty rate for Whites, one can assume that minority groups probably experienced higher rates of unemployment as well.

[39] U.S. Census Bureau, 2006-2008 American Community Survey (C05010)
[40] U.S. Census Bureau, 2005-2009 American Community Survey (B16001)

Figure 5-13
Civilian Labor Force, 2008

	Ohio Total	%	Stark County Total	%	Massillon City Total	%
Total Civilian Labor Force (CLF)	**5,906,242**	**100%**	**196,756**	**100%**	**16,647**	**100%**
Employed	5,490,147	93.0%	182,735	92.9%	15,176	91.2%
Unemployed	416,095	7.0%	14,021	7.1%	1,471	8.8%
Male CLF	**3,079,988**	**100%**	**101,088**	**100%**	**8,641**	**100%**
Employed	2,853,623	92.7%	**93,260**	92.3%	**7,855**	90.9%
Unemployed	226,365	7.3%	**7,828**	7.7%	**786**	9.1%
Female CLF	**2,826,254**	**100%**	**95,668**	**100%**	**8,006**	**100%**
Employed	2,636,524	93.3%	89,475	93.5%	7,321	91.4%
Unemployed	189,730	6.7%	6,193	6.5%	685	8.6%
White CLF	**5,071,904**	**100%**	**180,019**	**100%**	**15,074**	**100%**
Employed	4,766,453	94.0%	168,958	93.9%	13,884	92.1%
Unemployed	305,451	6.0%	11,061	6.1%	1,190	7.9%
Black CLF	**619,629**	**100%**	**12,343**	**100%**	**---**	**---**
Employed	526,938	85.0%	9,926	80.4%	---	---
Unemployed	92,691	15.0%	2,417	19.6%	---	---

Source: U.S. Census Bureau, 2006-2008 American Community Survey (C23001, C23002A, C23002B, C23002D, C23002I)

B. Housing Market

i. Housing Inventory

In Massillon, the housing stock grew by 1,811 units, or 14.1%, between 1990 and 2009. The largest increase was in census tract 7144, which grew by 526 units, or 113.4%. Three census tracts – 7137, 7141 and 7143.01 – lost housing units, as highlighted in Figure 5-14. Tract 7142, identified as an impacted area, gained 89 units, an increase of 7.4%. As Figure 5-15 on the following page depicts, higher rates of new housing development have occurred primarily in the City's southern half since 1990.

Figure 5-14
Trends in Total Housing Units, 1990-2009

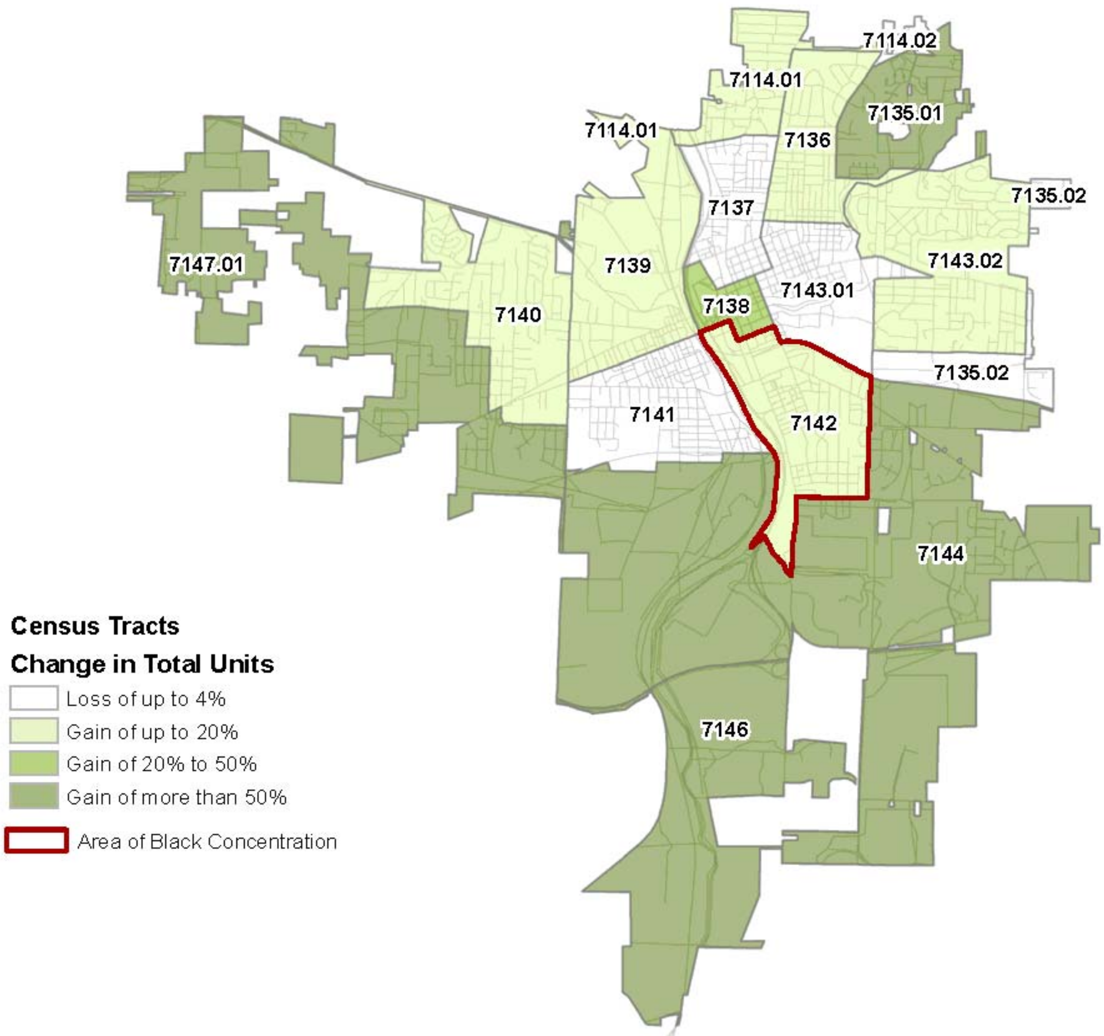
Census Tract	1990		2000		2009		Change 1990-2009	
	#	%	#	%	#	%	#	%
Massillon City	**12,814**	**100.0%**	**13,539**	**100.0%**	**14,625**	**100.0%**	**1,811**	**14.1%**
7114.01**	1,004	7.8%	976	7.2%	1,032	7.1%	28	2.8%
7114.02**	---	---	0	0.0%	0	0.0%	--	--
7135.01**	302	2.4%	307	2.3%	502	3.4%	200	66.2%
7135.02**	---	---	72	0.5%	74	0.5%	--	--
7136	1,123	8.8%	1,134	8.4%	1,129	7.7%	6	0.5%
7137	1,188	9.3%	1,206	8.9%	1,174	8.0%	-14	-1.2%
7138	188	1.5%	190	1.4%	228	1.6%	40	21.3%
7139*	820	6.4%	868	6.4%	882	6.0%	62	7.6%
7140*	1,639	12.8%	1,766	13.0%	1,759	12.0%	120	7.3%
7141	1,487	11.6%	1,434	10.6%	1,441	9.9%	-46	-3.1%
7142	1,197	9.3%	1,178	8.7%	1,286	8.8%	89	7.4%
7143.01	1,393	10.9%	1,367	10.1%	1,353	9.3%	-40	-2.9%
7143.02*	1,432	11.2%	1,634	12.1%	1,680	11.5%	248	17.3%
7144*	464	3.6%	610	4.5%	990	6.8%	526	113.4%
7146*	3	0.0%	0	0.0%	10	0.1%	7	233.3%
7147.01*	574	4.5%	797	5.9%	1,085	7.4%	511	89.0%

**Data in starred census tracts reflects only the parts of the tracts within the City of Massillon.*

***Census tracts 7114 and 7135 were split after 1990 Census*

Source: U.S. Census Bureau

Figure 5-15
Map: Change in Total Units by Census Tract, 1990-2009



ii. Types of Housing Units

In Massillon, 76% of the 13,539 units in 2000 were single-family homes. The highest concentration of single-family units was in census tract 7144, where 92.2% of the housing units were single-family. The lowest concentration was in census tract 7138, where only 10.5% of the housing stock was single-family.

Multi-family units comprised 21.3% of the total housing inventory. Among multi-family units, 14.2% had 20 units or more. In three census tracts, multi-family units accounted for more than one-quarter of the housing stock, as highlighted in Figure 5-16. In tract 7142, identified as an impacted area, 24% of the housing inventory consisted of multi-family units, a rate consistent with the citywide average.

Mobile homes accounted for 2.8% of the housing units in Massillon. The highest concentration of mobile homes was in tract 7140, where they comprised 19.6% of the housing stock.

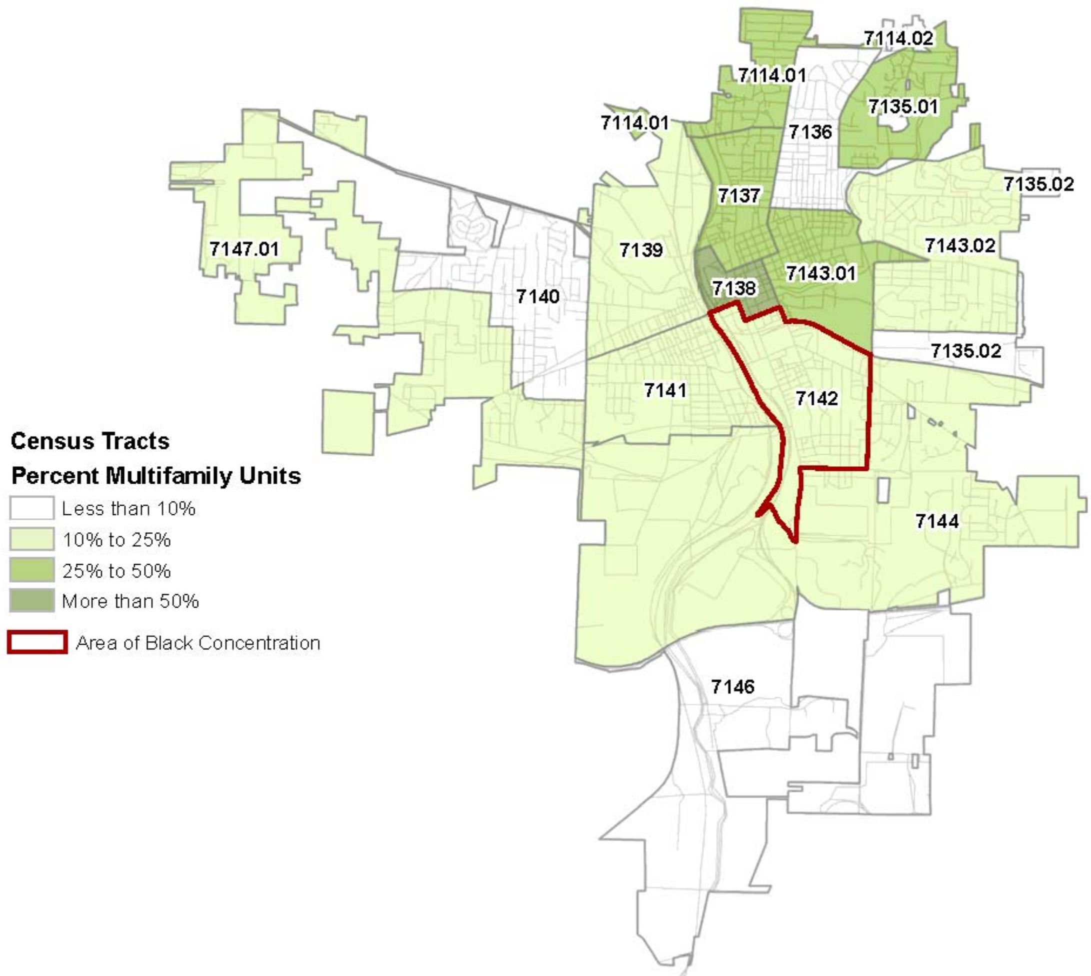
Figure 5-16
Trends in Housing Units in Structures, 2000

	Total Units	Single-family units (detached and attached)	Multi-family units					Mobile home
			2 to 4	5 to 9	10 to 19	20 or more	Total	
Massillon City	**13,539**	**10,281**	**1,681**	**453**	**339**	**410**	**2,883**	**375**
7114.01*	976	544	198	106	97	31	432	0
7114.02*	0	0	0	0	0	0	0	0
7135.01*	307	201	61	8	31	0	100	6
7135.02*	72	72	0	0	0	0	0	0
7136	1,134	1,023	68	30	6	0	104	7
7137	1,206	862	271	19	54	0	344	0
7138	190	20	75	13	19	63	170	0
7139*	868	736	89	0	0	43	132	0
7140*	1,766	1,313	70	15	0	21	106	347
7141	1,434	1,249	154	9	22	0	185	0
7142	1,178	895	150	34	6	93	283	0
7143.01	1,367	776	336	84	47	114	581	10
7143.02*	1634	1351	114	88	41	35	278	5
7144*	610	534	76	0	0	0	76	0
7146*	0	0	0	0	0	0	0	0
7147.01*	797	705	19	47	16	10	92	0

**Data in starred census tracts reflects only the parts of the tracts within the City of Massillon.*
Source: U.S. Census Bureau, Census 2000 (SF 3, H30)

Figure 5-17 on the following page illustrates the percentage of housing units in each census tract that were multi-family structures in 2000. The maximum was in tract 7138, where 89.5% of housing units were multi-family.

Figure 5-17
Map: Multifamily Units as Percent of Total by Census Tract, 2000



iii. Foreclosure Trends

HUD NSP Estimates provides foreclosure data at the local level.[41] Between January 2007 and June 2008, the City of Massillon had an estimated 664 foreclosure filings, representing a foreclosure rate of 9.7%. Within the impacted area of the City, tract 7142 had a foreclosure rate of 15.2%, significantly higher than other areas of Massillon.

Figure 5-18
Estimated Residential Foreclosure Rates by Census Tract,
January 2007 – June 2008

Census tract	Foreclosure Filings	Total Mortgages	Foreclosure Rate
Massillon City	**664**	**6,863**	**9.7%**
7114.01*	123	2,188	5.6%
7114.02*	68	1,602	4.2%
7135.01*	63	1,007	6.3%
7135.02*	84	1,137	7.4%
7136	61	667	9.1%
7137	54	472	11.4%
7138	2	14	14.3%
7139*	52	410	12.7%
7140*	72	880	8.2%
7141	101	732	13.8%
7142	62	407	15.2%
7143.01	71	528	13.4%
7143.02*	72	894	8.1%
7144*	61	901	6.8%
7146*	62	887	7.0%
7147.01*	103	1,472	7.0%

**Starred census tracts are partially contained within the City. Therefore, census tract totals may be more than the City overall.*

Source: HUD NSP Foreclosure Estimates, released October 2008

In September 2010, RealtyTrac reported 70 new foreclosure filings in Massillon, or 1 in every 393 housing units.

Foreclosure activity is related to fair housing to the extent that it is disproportionately dispersed, both geographically and among members of the protected classes. Concentrated foreclosures and residential vacancy threaten the viability of neighborhoods as well as the ability of families to maintain housing and build wealth. Households carrying heavy cost burdens are prime candidates for mortgage delinquency and foreclosure.

[41] HUD NSP Estimates data, covering the period between January 2007 and June 2008, is not an exact count, but distributes the results of a national survey across geographic areas according to a model considering rates of metropolitan area home value decline, unemployment and high-cost mortgages.

Observation

Between January 2007 and June 2008, Massillon had a foreclosure rate of 9.7%. Census tract 7142, an area of concentration of Black residents, had a foreclosure rate of 15.2%.

iv. Protected Class Status and Home Ownership

The value in home ownership lies in the accumulation of wealth as the owner's share of equity increases with the property's value. Paying a monthly mortgage instead of rent is an investment in an asset that is likely to appreciate. According to one study, "a family that puts 5 percent down to buy a house will earn a 100 percent return on the investment every time the house appreciates 5 percent."[42]

In Massillon, Black and Asians had home ownership rates of 51.2% and 60.0%, respectively, compared to 70.4% of Whites. Hispanic households had the lowest home ownership rate, with only 25.9% of households owning their homes. Notably, census tract 7142, an area of racial concentration, had a rate of home ownership for Blacks that exceeded the citywide average.

[42] Kathleen C. Engel and Patricia A. McCoy, "From Credit Denial to Predatory Lending: The Challenge of Sustaining Minority Homeownership," in *Segregation: The Rising Costs for America,* edited by James H. Carr and Nandinee K. Kutty (New York: Routledge 2008) p. 82.

Figure 5-19
Home Ownership by Race and Ethnicity, 2000

Census Tract	White		Black		Asian		Hispanic	
	#	%	#	%	#	%	#	%
Massillon City	**8,100**	**70.4%**	**499**	**51.2%**	**24**	**60.0%**	**22**	**25.9%**
7114.01*	473	53.3%	0	0.0%	---	---	---	---
7114.02*	---	---	---	---	---	---	---	---
7135.01*	160	58.6%	4	100.0%	---	---	0	0.0%
7135.02*	31	56.4%	---	---	---	---	---	---
7136	885	84.0%	13	68.4%	7	100.0%	7	100.0%
7137	666	62.9%	12	35.3%	8	100.0%	0	---
7138	6	4.8%	0	0.0%	---	---	0	0.0%
7139*	558	71.4%	23	65.7%	---	---	---	---
7140*	1,451	86.0%	4	100.0%	0	0.0%	---	---
7141	976	76.6%	14	51.9%	---	---	0	0.0%
7142	325	53.5%	277	61.0%	---	---	0	0.0%
7143.01	601	51.8%	20	24.4%	5	35.7%	5	27.8%
7143.02*	1,108	79.4%	92	59.7%	4	100.0%	4	28.6%
7144*	256	65.5%	31	28.2%	---	---	6	100.0%
7146*	---	---	---	---	---	---	---	---
7147.01*	604	79.8%	9	100.0%	---	---	---	---

**Data in starred census tracts reflects only the parts of the tracts within the City of Massillon.*

Note: Cells for tracts in which no members of a racial or ethnic group live are left blank to differentiate them from tracts in which only renters live

Source: U.S. Census Bureau, Census 2000 (SF 3, H11, H12)

As discussed previously in this report, median household income is lower among Black households in Massillon than among White households. This factor contributes to the lower rates of home ownership among minorities in the City.

Observation

Lower household incomes among Blacks are reflected in lower home ownership rates when compared to Whites.

Among Black households, 51.2% were home owners compared to 70.4% of White households.

v. The Tendency of the Protected Classes to Live in Larger Households

Larger families may be at risk for housing discrimination on the basis of race and the presence of children (familial status). A larger household, whether or not children are present, can raise fair housing concerns. If there are policies or programs that restrict the number of persons that can live together in a single housing unit, and members of the protected classes need more bedrooms to accommodate their larger household, there is a fair housing concern because the restriction on the size of the unit will have a negative impact on members of the protected classes.

Among Black families, 61.9% had three or more persons compared to 55.1% of White families. Among Persons of Two or More races, 53.2% of families were considered large.

Figure 5-20
Families with Three or More Persons, 2000

Race	Percent of Families with Three or More Persons
White	55.1%
Black	61.9%
Two or More Races	53.2%

Source: U.S. Census Bureau, Census 2000 (SF 4, PCT17)

To adequately house larger families, a sufficient supply of larger dwelling units consisting of three or more bedrooms is necessary. In Massillon, 24.5% of the rental housing stock contained three or more bedrooms in 2000 compared to 74.1% of the owner-occupied housing stock.

Figure 5-21
Housing Units by Number of Bedrooms, 2000

	Renter-Occupied Housing Stock		Owner-Occupied Housing Stock	
Size of Housing Units	Number of Units	Percent of Total Housing Units	Number of Units	Percent of Total Housing Units
0-1 bedroom	1,313	33.0%	170	2.0%
2 bedrooms	1,688	42.5%	2,071	23.9%
3 or more bedrooms	**974**	**24.5%**	**6,428**	**74.1%**
Total	3,975	100.0%	8,669	100.0%

Source: U.S. Census Bureau, Census 2000 (SF 3, H42)

Observation

Black households were more likely to live in larger families than White households.

Among Black families, 61.9% had three or more persons compared to 55.1% of White families. However, only 24.5% of the rental housing stock contains three or more bedrooms compared to 74.1% of the owner housing stock.

vi. Cost of Housing

Increasing housing costs are not a direct form of housing discrimination. However, a lack of affordable housing does constrain housing choice. Residents may be limited to a smaller selection of neighborhoods because of a lack of affordable housing in those areas.

In Massillon, median housing value increased 29.6% between 1990 and 2008, after adjusting for inflation. Most of this increase in value occurred during the 1990s; between 2000 and 2008, real housing value decreased slightly. Median gross rent, on the other hand, decreased 5.7%. By comparison, median household income decreased 2.8% during this period.

Figure 5-22
Trends in Housing Value, Rent and Income, 1990-2008

	Median Housing Value	Median Gross Rent	Median Household Income
1990			
Massillon City	$75,703	$599	$41,357
Stark County	$99,664	$618	$48,360
2000			
Massillon City	$106,618	$575	$42,303
Stark County	$129,621	$628	$51,466
2008			
Massillon City	$98,100	$565	$40,193
Stark County	$129,900	$610	$45,306
%Change 1990-2008			
Massillon City	29.6%	-5.7%	-2.8%
Stark County	30.3%	-1.3%	-6.3%

**All numbers are in 2008 inflation-adjusted dollars. Sources: U.S. Census Bureau, 1990 Census (STF3-H061A, H043A, P080A), Census 2000 (SF3-H76, H63, P53), 2006-2008 American Community Survey (B25077, B25064, B19013); Calculations by Mullin & Lonergan Associates, Inc.*

a. Rental Housing

Despite a decrease in real median gross rent, Massillon has lost a large number of affordable rental units. Between 2000 and 2008, the City lost over one-third of the units renting for less than $500 a month. During the same period, the number of units renting for $1,000 or more increased ten-fold, from 21 to 242.

Figure 5-23
Loss of Affordable Rental Housing Units, 2000-2008

			Change 2000-2008	
Units Renting for:	**2000**	**2008**	**#**	**%**
Less than $500	2,340	1,546	-794	-33.9%
$500 to $699	1,093	1,242	149	13.6%
$700 to $999	256	757	501	195.7%
$1,000 or more	21	242	221	1052.4%

Sources: U.S. Census Bureau, Census 2000 (SF3, H62), 2008 American Community Survey (B25063)

Observation

Massillon lost over one-third of its units renting for less than $500 between 2000 and 2008.

By comparison, units renting for more than $1,000 increased ten-fold, from 21 to 242.

The National Low Income Housing Coalition provides annual information on the Fair Market Rent (FMR) and affordability of rental housing in counties and cities in the U.S. for 2010. In Stark County, the FMR for a two-bedroom apartment is $644. In order to afford this level of rent and utilities, without paying more than 30% of income on housing, a household must earn $2,147 monthly or $25,760 annually. Assuming a 40-hour work week, 52 weeks per year, this level of income translates into a Housing Wage of $12.38.

In Stark County, a minimum-wage worker earns an hourly wage of $7.30. In order to afford the FMR for a two-bedroom apartment, a minimum-wage earner must work 68 hours per week, 52 weeks per year. Or, a household must include 1.7 minimum-wage earners working 40 hours per week year-round in order to make the two-bedroom FMR affordable.

In Stark County, the estimated average wage for a renter is $10.46 an hour. In order to afford the FMR for a two-bedroom apartment at this wage, a renter must work 47 hours per week, 52 weeks per year. Or, working 40 hours per week year-round, a household must include 1.2 workers earning the average renter wage in order to make the two-bedroom FMR affordable.

Observation

Minimum-wage and single-income households cannot afford a housing unit renting for the HUD fair market rent in Massillon and throughout Stark County.

This situation forces these individuals and households to double-up with others, or lease inexpensive, substandard units. Minorities and female-headed households will be disproportionately impacted because of their lower-incomes.

Monthly Supplemental Security Income (SSI) payments for an individual are $674 in Stark County and across Ohio. If SSI represents an individual's sole source of income, $202 in monthly rent is affordable, while the FMR for a one-bedroom is $510.

Observation

Persons with disabilities receiving SSI as their sole source of income cannot afford a one-bedroom unit renting at the fair market rate of $510.

b. Sales Housing

One method used to determine the inherent affordability of a housing market is to calculate whether a household at the median income could purchase the median or average sales price home. The median household income in the City of Massillon was $40,193 in 2008. With this income, a household could purchase a home selling for $148,400. This is well above the average sales price of $100,901 throughout Stark County.

It is possible also to determine the affordability of the housing market for each racial or ethnic group in the City. To determine affordability (i.e., how much mortgage a household could afford), the following assumptions were made:

- The mortgage was a 30-year fixed rate loan at a 5.0% interest rate,
- The buyer made a 10% down payment on the sales price,
- Principal, interest, taxes and insurance (PITI) equaled no more than 30% of gross monthly income,
- Property taxes were assessed for the Massillon City School District tax rate of 1.680% of the market price, and
- There was no additional consumer debt (credit cards, etc).

Figure 5-24 details the estimated *maximum* affordable sales prices and monthly PITI payments for Whites and Blacks in Massillon (sample sizes for Asians and Hispanics were too small to analyze). Black households earning the median household income had a maximum affordable sales price of $102,400, which was $50,000 less than the maximum affordable purchase price for White households. However, the maximum affordable sales price for Blacks was still higher than Stark County's average sales price, suggesting that the sales market is relatively affordable.

Figure 5-24
Maximum Affordable Purchase Price by Race/Ethnicity, 2009

		Monthly Mortgage Payment				
	Median Household Income	Mortgage Principal & Interest	Real Estate Taxes	Homeowner's Insurance & PMI	Total PITI Payment	Maximum Affordable Purchase Price
Massillon City	**$40,193**	**$717**	**$208**	**$80**	**$1,005**	**$148,400**
Whites	$41,490	$742	$215	$80	$1,037	$153,600
Blacks	$28,717	$495	$143	$80	$718	$102,400
2009 Stark County Average Sales Price: $100,901						

Sources: 2006-2008 American Community Survey (B19013, B19013A, B19013B); Stark County Association of Realtors; Stark County Auditor's Office; Calculations by Mullin & Lonergan Associates, Inc.

Observation

Due to a lower median household income, Black families on the whole have a lower maximum affordable home purchase price. This translates to fewer options for Black households when buying a home.

While White households could afford a maximum purchase price of $153,600, Black households were limited to a maximum purchase price of $102,400.

vii. Protected Class Status and Housing Problems

Lower-income minority households tend to experience housing problems at a higher rate than lower-income white households.[43] Among renter households in Massillon, however, Blacks had lower rates of housing problems compared to Whites. Of all the Black renter households that earned less than 80% of the median family income (MFI), 40.1% had a housing problem, compared with 48% of White households.

Among owner households earning less than 80% MFI, Whites had a lower incidence of housing problems (39.4%) than Blacks (58.5%). The greatest incidence of housing problems was among all other Black households (76.0%). However, the total number of Black renters and owners was relatively low when compared to White renters and owners.

Figure 5-25
Lower-income Households with Housing Problems, 2000

	Total Households 0-80% of MFI		Elderly & 1-2 Person Households 0-80% of MFI		Family Households 0-80% of MFI		All Other Households 0-80% of MFI	
	Total	% with a Housing Problem	Total	%	Total	%	Total	%
Renters								
White Non-Hispanic	2,296	48.0%	666	44.1%	931	47.8%	699	52.1%
Black Non-Hispanic	322	40.1%	54	33.4%	203	47.8%	65	21.5%
Total	**2,588**	**46.0%**	**710**	**43.3%**	**1,133**	**46.2%**	**745**	**48.3%**
Owners								
White Non-Hispanic	2,840	39.4%	1,363	29.9%	1,072	48.3%	405	47.9%
Black Non-Hispanic	246	58.5%	84	50.0%	112	57.2%	50	76.0%
Total	**3,060**	**40.6%**	**1,405**	**30.2%**	**1,212**	**49.2%**	**443**	**49.9%**

Source: HUD Comprehensive Housing Affordability Strategy data

[43] HUD defines housing problems as (1) cost burden of 30% or more (i.e. paying more than 30% of gross income on monthly housing expenses), and/or (2) lacking complete kitchen or plumbing facilities, and/or (3) overcrowding of more than 1.01 persons per room.

Observation

Lower-income Black home owners experienced housing problems at greater rates than White home owners.

Among owner households, 58.5% of Blacks had housing problems, compared to 39.4% of Whites.

C. Review of Public Sector Policies

The analysis of impediments is a review of impediments to fair housing choice in the public and private sector. Impediments to fair housing choice are any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status or national origin that restrict housing choices or the availability of housing choices, or any actions, omissions or decisions that have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex, disability, familial status or national origin. Policies, practices or procedures that appear neutral on their face but which operate to deny or adversely affect the provision of housing to persons of a particular race, color, religion, sex, disability, familial status, or national origin may constitute such impediments.

An important element of the AI includes an examination of public policy in terms of its impact on housing choice. This section evaluates the public policies in the City of Massillon to determine opportunities for furthering the expansion of fair housing choice.

i. City Policies Governing Investment of Federal Entitlement Funds

From a budgetary standpoint, housing choice can be affected by the allocation of staff and financial resources to housing related programs and initiatives. The decline in federal funding opportunities for affordable housing for lower income households has shifted much of the challenge of affordable housing production to state, county and local government decision makers.

The recent Westchester County, NY, fair housing settlement also reinforces the importance of expanding housing choice in non-impacted areas (i.e. areas outside of concentrations of minority and LMI persons). Westchester County violated its cooperation agreements with local units of government which prohibit the expenditure of CDBG funds for activities in communities that do not affirmatively further fair housing within their jurisdiction or otherwise impede the County's action to comply with its fair housing certifications.

The City of Massillon's federal entitlement funds received from HUD may be used for a variety of activities to serve a variety of aims, as follows:

- Community Development Block Grant (CDBG): The primary objective of this program is to develop viable urban communities by providing decent housing, a suitable living environment, and economic opportunities, principally for persons of low and moderate income levels. Funds can be used for a wide array of activities, including: housing rehabilitation, homeownership assistance, lead-based paint detection and removal, construction or rehabilitation of public facilities and infrastructure, removal of architectural barriers, public services, rehabilitation of commercial or industrial buildings, and loans or grants to businesses.
- HOME Investment Partnerships Program (HOME): The HOME program provides federal funds for the development and rehabilitation of affordable rental and ownership housing for low and moderate income households. HOME funds can be used for activities that promote affordable rental housing and homeownership by low and moderate income households, including reconstruction, moderate or substantial rehabilitation, homebuyer assistance, and tenant-based rental assistance.

In addition, the City has also received funding from the Neighborhood Stabilization Program (NSP), which was established for the purpose of stabilizing communities that have suffered from foreclosures and abandonment. Through the purchase and redevelopment of foreclosed and abandoned homes and residential properties, the goal of the program is being realized. NSP1, a term that references the NSP funds authorized under Division B, Title III of the Housing and Economic Recovery Act (HERA) of 2008, provides grants to all states and selected local governments on a formula basis. Massillon applies its NSP funds to direct assistance for low-, moderate- and middle-income households to purchase homes on sites affected by foreclosure.

As a member of the Stark County HOME Consortium, the City of Massillon accounts for its CDBG and NSP funds in its Five-Year Consolidated Plan and annual plans. HOME funds are administered by the Stark County Regional Planning Commission and accounted for in countywide planning documents. In its latest Consolidated Plan, the City characterizes its greatest housing needs as rehabilitation of existing stock, home ownership assistance programs and increased affordable housing for the elderly.

In the City's CAPER for FY 2008, the latest available for review, Massillon's fair housing program was allocated $27,000 in CDBG funds, an amount that was equivalent to 2.8% of its CDBG budget. The largest portion of the budget ($226,627, or 23.4%) was dedicated to housing rehabilitation.

Observation

Massillon allocated $27,000 of its 2008 CDBG entitlement grant to fair housing activities. This was equivalent to 2.8% of its total grant amount. Generally speaking, an entitlement should budget 1%-3% of its annual CDBG grant.

ii. Affirmative Marketing Policy

The City is required to adopt affirmative procedures and requirements for all CDBG- and HOME-assisted housing with five or more units. Such a plan should include:

Methods of informing the public, owners, and potential tenants about fair housing laws and the City's policies

- A description of what the owners and/or the City will do to affirmatively market housing assisted with CDBG or HOME funds
- A description of what the owners and/or the City will do to inform persons not likely to apply for housing without special outreach
- Maintenance of records to document actions taken to affirmatively market CDBG- and HOME-assisted units and to assess marketing effectiveness, and
- A description of how efforts will be assessed and what corrective actions will be taken where requirements are not met.

The Stark County Regional Planning Commission administers HOME funds in the City of Massillon and is responsible for the affirmative marketing of HOME-assisted units. As an administrator of CDBG grants, the City is responsible for the affirmative marketing of any CDBG-assisted housing developments of five or more units. Typically, this type of project is completed through the use of HOME funds. While Massillon accepts applications for CDBG assistance on housing-related projects, the City does not often undertake CDBG activities that would trigger affirmative marketing compliance. Therefore, affirmative marketing procedures are not incorporated into the Five-Year Consolidated Plan or annual plans.

Observation

Though the City typically does not apply CDBG resources to activities that would trigger compliance with affirmative marketing regulations, the City should adopt a general affirmative marketing policy.

Outlining affirmative marketing requirements would clarify the City's policy stance on fair housing. It would also establish consistent procedure for any future CDBG activity affecting housing with five or more units, regardless of funding source.

iii. Site and Neighborhood Selection Policy

Recipients of HOME funds are required to administer their program in compliance with the regulations found at 24 CFR 983.6(b), known as the Site and Neighborhood Standards. These standards address the site location requirements for newly constructed rental units financed with HOME funds.

Site selection for HOME-assisted construction of new rental units must comply with several standards, including among other things, promoting greater choice of housing opportunities and avoiding undue concentration of assisted persons in areas containing a high concentration of LMI persons. With few exceptions, site selection must include a location that is not in an area of minority concentration. In Massillon, census tract 7412 is an impacted area.

The Stark County Regional Planning Commission is ultimately responsible for ensuring that HOME-assisted units are not unduly concentrated in impacted areas, including tract 7412 within the City of Massillon. It is important that the City works closely with its partners in the consolidated planning process to ensure that non-concentrated areas of opportunity within Massillon are promoted as potential sites for the development of affordable housing.

The City directs most of its CDBG activities to impacted areas, specifically census tracts with high concentrations of lower-income and minority households. In the most recent Consolidated Plan, these areas include tracts 7138, 7142, 7143.91 and 7144, as well as portions of 7137, 7141 and 7143.02. By focusing its federal funding in these areas, the City hopes to maximize the benefits of programs for those households most in need of assistance.

Among its housing priorities listed in the Consolidated Plan, the City includes an objective to increase the supply of available and affordable housing for very low income owner and renter households, which it does by providing both CDBG and

HOME funds, along with technical assistance, to local nonprofit housing providers to assist in the development and construction of owner and rental housing for LMI households. The City also has a strategy to work with for-profit and non-profit developers to support the expansion of the affordable housing stock through other programs, such as low-income housing tax credits and Section 202/811 funding. Currently, planning documents indicate that most of this activity occurs in targeted census tracts, which are the City neighborhoods most impacted by poverty and minority concentration.

The City's use of federal funds to expand the number of affordable housing opportunities available call for a neighborhood and site selection policy that will ensure that opportunities are directed to non-impacted areas. The City must strive to seek a balance between stabilizing and revitalizing its most vulnerable neighborhoods and pursuing desegregation through the creation of affordable housing in areas of opportunity (i.e. outside areas of concentration of minorities and LMI persons).

Observation

The City of Massillon should adopt a site selection policy relating to the location of new affordable housing developments. To expand fair housing choice, the City must increase the availability of affordable housing opportunities beyond the neighborhoods most impacted by poverty and minority concentration.

iv. Appointed Boards and Commissions

A community's sensitivity to fair housing issues is often determined by people in positions of public leadership. The perception of housing needs and the intensity of a community's commitment to housing related goals and objectives are often measured by board members, directorships, and the extent to which these individuals relate within an organized framework of agencies, groups, and individuals involved in housing matters. The expansion of fair housing choice requires a team effort and public leadership and commitment is a prerequisite to strategic action.

a. Fair Housing Board

The Fair Housing Board is a seven-member body appointed by the Mayor to oversee the implementation of the City's Fair Housing Code. The Board is responsible for reviewing Massillon's community development and housing programs, in particular the City's New Horizons program, to ensure they comply with the City's fair housing policy. Additionally, the Board will process and investigate fair housing complaints in the City. As of March 2011, the Board had five volunteers, including one White male, one White female and three Black females.

b. Planning Commission

The Planning Commission is an eight-member body appointed by the Mayor. The Commission is responsible for amending the zoning code when necessary, reviewing all site plans in the City, and reviewing applications for conditional use and subdivision variances. As of March 2011, six of the eight Commission seats were filled. Members included three White males, two White females and a Black female.

c. Board of Zoning Appeals

The Zoning Board of Appeals is an eight-member body appointed by the Mayor. The Board hears appeals to decisions made regarding any order, requirement, permit, decision or refusal made on by the City's Building Inspector or other administrative bodies enforcing the zoning ordinance. The Board may also grant variances through the appeal process and exceptions and special approvals. The Board's five members in March 2011 included four White males and one Black male.

d. Building Board of Appeals

The Building Board of Appeals is appointed by the Mayor to hear appeals to decisions made regarding interpretation of the various locally applicable building codes. The Board's five members in March 2011 included two White males, two White females and a Black male.

Observation

Racial minorities and women are represented in public decision making regarding housing issues via participation in appointed public volunteer boards.

The combined total of board members was 43% female and 29% Black. By comparison, Massillon's total population was 9.8% Black in 2010. Additionally, the City's establishment of a Fair Housing Board is commendable.

v. Accessibility of Residential Dwelling Units

From a regulatory standpoint, local government measures define the range and density of housing resources that can be introduced in a community. Housing quality standards are enforced through the local building code and inspections procedures. The City of Massillon has adopted the Ohio Building Code to apply to the construction and alteration of every building and structure in the City. One-, two- and three-family dwellings are also subject to the Residential Building Code of Ohio. Additional building code standards include

- 2007 Ohio Mechanical Code
- 2007 Ohio Plumbing Code
- 2002 National Electric Code

Per the Ohio Building Code, accessibility standards for units are based on the ADA Accessibility Guidelines. The City's Building and Zoning Department is responsible for residential, commercial and industrial code enforcement.

vi. Language Access Plan for Persons with Limited English Proficiency

The City of Massillon does not currently have a Language Access Plan (LAP) to enhance services offered to persons with LEP. However, the population of such persons in Massillon is relatively small: 170 spoke English less than "very well" in 2000, representing 0.5% of all residents. While the City should continue to be responsive to the needs of persons who may need language assistance to access City programs and services, the number and proportion of persons with LEP in Massillon does not currently trigger the need to carry out HUD's four-factor analysis at this time.

vii. Comprehensive Planning

A community's comprehensive plan is a statement of policies relative to new development and preservation of existing assets. In particular, the land use element of the comprehensive plan defines the location, type and character of future development. The housing element of the comprehensive plan expresses the preferred density and intensity of residential neighborhoods within the City. Taken together, the land use and housing elements of the comprehensive plan define a vision of the type of community that the City of Massillon wishes to become.

Massillon's latest comprehensive planning document is the Future Land Use Plan, prepared in 1969. Over the years, portions of the Plan have been updated, including the Central Business District Plan, Park and Recreation Plan and Transportation Plan. For the purpose of planning for the investment of entitlement funds, the City does not heavily rely on the Future Land Use Plan, instead conducting research and estimating housing and community development needs via the Five-Year Consolidated Planning process.

The housing component of the Future Land Use Plan envisions 13 distinct residential areas, neighborhoods separated by thoroughfares and other land uses. The Plan estimates that at full build-out within the City's 1969 borders, the City could adequately accommodate 41,700 persons. The Census population for Massillon was 32,539 in 1970 and 32,149 in 2010.

The Plan suggests a significant expansion of areas where multi-family housing could be developed, with a commensurate increase in recreational and public lands. Additionally, the Plan calls for the "stabilization" of single-family residential areas and provision for a variety of lot sizes therein. Low-rise multi-family development is proposed in close proximity to the Central Business District to transition between non-residential and single-family uses.

Observation

While Massillon does not currently use comprehensive planning as a means of developing and implementing housing policy, the latest plan on record is not inconsistent with fair housing goals.

The Future Land Use supplies a brief and somewhat vague treatment of housing policy that proposes the expansion of multi-family housing opportunities and the use of denser multi-family residential areas to connect single-family neighborhoods with non-residential uses. These policies are still appropriate for a City of Massillon's development mix and demographic composition.

viii. Zoning

In Ohio, the power behind land development decisions resides with municipal governments through the formulation and administration of local controls. These include comprehensive plans, zoning ordinances and subdivision ordinances, as well as building and occupancy permits.

The City of Massillon's Planning and Zoning Code, Part 11 of the Codified Ordinances of the City of Massillon, was reviewed to identify potential impediments to fair housing choice. This analysis is based on the following five topics raised in HUD's Fair Housing Planning Guide, which include:

- The opportunity to develop various housing types, including apartments and housing at various densities
- The opportunity to develop alternative designs, such as cluster developments, planned residential developments, inclusionary zoning and transit-oriented developments
- Minimum lot size requirements
- Dispersal requirements and regulatory provisions for housing facilities for persons with disabilities (i.e. group homes) in single-family zoning districts
- Restrictions on the number of unrelated persons in dwelling units

a. Date of Ordinance

Generally speaking, the older a zoning ordinance, the less effective it will be. Older zoning ordinances have not evolved to address changing land uses, lifestyles and demographics. However, the age of the zoning ordinance does not necessarily mean that the regulations impede housing choice by members of the protected classes.

The City adopted its latest zoning regulations in 1978. Amendments have since updated certain sections of the ordinance. Some outdated language and references remain (for example, the term "mentally retarded") and should be amended.

Observation

Massillon's zoning ordinance should be amended to remove outdated nomenclature, such as "mentally retarded."

b. Residential Zoning Districts and Permitted Dwelling Types

The number of residential zoning districts is not as significant as the characteristics of each district, including permitted land uses, minimum lot sizes, and the range of permitted housing types. However, the number of residential zoning districts is indicative of the jurisdiction's desire to promote and provide a diverse housing stock for different types of households at a wide range of income levels.

The City of Massillon has nine residential districts, including five districts for single-family detached structures, a district additionally allowing two-family structures, a condominium district and two multi-family districts. Subject to restrictions, multi-family residential uses are also permitted in the central business district and single-family detached dwellings are permitted in agricultural areas.

The two multi-family districts, RM1 and RM2, are distinguished by maximum structure height. In RM1, structures may not exceed 2.5 stories or 25 feet, while in R2, structures may be up to 60 feet. RM1 appears on the zoning map in about 22 separate sites, scattered around the City but in many cases clustered along major thoroughfares. This allows apartment residents access to the transit and amenities available along such routes. The zoning map displays only three isolated sites zoned as RM2. All multi-family zones in both RM1 and RM2 appear as though the districts were designated to impose controls on existing multi-family sites, rather than to set aside areas of the City where multi-family housing could be developed. The zoning map seems to indicate a relatively limited amount of land that is vacant and zoned for the development of additional multi-family housing. However, multi-family housing currently exists in many areas of the City.

Observation

While multi-family housing currently exists in many areas of Massillon, the amount of land zoned and available for the development of additional multi-family housing is limited.

The City's two multi-family zoning districts appear to have been drawn only to encompass existing apartment buildings, not to designate areas of the City where this type of development is appropriate. Multi-family housing represents an affordable housing option. Because members of the protected classes often have lower household incomes, limiting options for affordable housing may impede housing choice by individuals and families protected under federal, state and local fair housing statutes.

c. Permitted Residential Lot Sizes

Excessively large lot sizes may deter development of affordable housing. A balance should be struck between areas with larger lots and those for smaller lots that will more easily support creation of affordable housing. Finally, the cost of land is an important factor in assessing affordable housing opportunities. Although small lot sizes of 10,000 square feet or less may be permitted, if the cost to acquire such a lot is prohibitively expensive, then new affordable housing opportunities may be severely limited, if not non-existent.

Minimum lot sizes in Massillon's residential zoning districts range from 21,780 square feet in R4, the least dense single-family detached district, to 7,800 square feet in R1, the densest single-family detached district. The minimum for two-family lots is 4,800 square feet, while multi-family districts do not have minimum lot size requirements. R4 represents only a minimal percentage of the City's total land compared to R1, R2 (minimum 9,600 sf) and R3 (minimum

12,000 sf). Overall, lot size requirements and land prices do not represent a potential impediment to the development of affordable housing in Massillon.

d. Alternative Design

Allowing alternative designs provides opportunities to expand the supply of affordable housing by reducing the cost of infrastructure spread out over a larger parcel of land. Alternative designs may also increase the economies of scale in site development, further supporting the development of lower cost housing. Alternative designs can promote other community development objectives, including agricultural preservation or protection of environmentally sensitive lands, while off-setting large lot zoning and supporting the development of varied residential types. However, in many communities, alternative design developments often include higher-priced homes. Consideration should be given to alternative design developments that seek to produce and preserve affordable housing options for working and lower income households.

The City of Massillon has an overlay Planned Unit Development (PUD) district designed to provide flexibility in the development of integrated development areas of at least eight acres. Specifically, the overlay allows developers to cluster single- and multi-family structures so that large areas of land can be left as open space. While the City's ordinance has allowed for PUD since 1975, the current zoning map shows only one PUD, comprising an area of mixed structure types off of Ledgewood Boulevard on Massillon's northeast side. The ordinance does not include an affordable units setaside, which means that Massillon's PUD overlay exists as a means of expanding housing choice only to the extent that its flexibility encourages a mixture of structure types.

e. Definition of Family

Local zoning and land use laws that treat groups of unrelated persons with disabilities less favorably than similar groups of unrelated persons without disabilities violate the Fair Housing Act. Restrictive definitions of family may impede unrelated individuals from sharing a dwelling unit. Defining family broadly advances non-traditional families and supports the blending of families who may be living together for economic purposes. Restrictions in the definition of family typically cap the number of unrelated individuals that can live together. These restrictions can impede the development of group homes, effectively restricting housing choice for persons with disabilities.

The City of Massillon defines a family as one or two persons or parents, with their direct lineal descendants and adopted children (and including the domestic employees thereof) together with not more than two persons not so related, living together in the whole or part of a dwelling unit. Every additional group of two or less persons living in such dwelling unit is considered as a separate family.

Strictly interpreted, this definition could allow up to four unrelated persons to live together ("two persons," the relationship between whom is left undefined, along with "two persons not so related"). While limiting the number of unrelated residents in a household to four can restrict housing choice for non-traditional families, the ordinance has an exception for group homes, specifically listing them as a separate use that is permitted in certain areas. Therefore, the definition is not ideally broad, but it does not appear to be in violation of the Fair

Housing Act because it does not limit the number of persons who can reside in a group home.

Observation

Massillon could simplify its definition of “family” by focusing on whether a household functions as a cohesive unit rather than distinguishing between related and unrelated persons. A restrictive definition that limits the number or type of relationship between persons living together as a household unit in a single-family dwelling unit is incompatible with many modern living situations.

f. Regulations for Group Homes for Persons with Disabilities

Group homes are residential uses that do not adversely impact a community. Efforts should be made to ensure group homes can be easily accommodated throughout the community under the same standards as any other residential use. Of particular concern are those that serve members of the protected classes such as the disabled. Because a group home for the disabled provides a non-institutional experience for its occupants, imposing special conditions is contrary to the purpose of a group home. More importantly, the restrictions, unless required of all residential uses in the zoning district, impede the creation of group homes and are in violation of the Fair Housing Act.

Two primary purposes of a group home residence are normalization and community integration. By allowing group residences throughout the community in agreement with the same standards as applied to all other residential uses occupied by a family, the purposes of the use are not hindered and housing choice for the disabled is not impeded. Toward this end, the imposition of distancing or separation requirements on group homes for persons with disabilities is a violation of the Fair Housing Act.

Massillon defines a "residential social service facility" as a facility or home whose primary purpose is to provide supervised room, board and care in a residential setting to three or more residents whose disabilities or status limit their ability to live independently, and secondarily for training, rehabilitation and non-clinical services. The ordinance states that these residents “may be mentally retarded, released from state institutions, juvenile offenders, drug or alcoholic offenders, or wards of the court or welfare system.”

Within this definition are two types of group homes: A “family home” is a residential social service facility that provides room and board, personal care, habilitation services and supervision in a family setting for not more than eight persons with developmental disabilities, while a “group home” provides the same services to between nine and sixteen persons with developmental disabilities.

The ordinance specifies that “developmental disabilities” are not physical disabilities, but permanent conditions that originate before a person reaches the age of 18, constituting “a substantial handicap to the person's ability to function normally in society … attributable to mental retardation, cerebral palsy, epilepsy, autism or any other condition found to be closely related to mental retardation because such condition results in similar impairment of general intellectual functioning or adaptive behavior or requires similar treatment and services."

It is unclear why the definitions of "family home" and "group home" specify that their residents must be developmentally disabled, especially because the broader definition of "residential social service facility" includes all disabilities, encompassing persons with physical limitations and substance abuse issues.

Massillon places buffers on residential social service facilities, specifying that they may not be established within 2,500 feet of any similar facility (other group homes, as well as nursing homes or rest homes). Additionally, residential social service facilities may only be established in "eligible" census tracts. These are tracts that contain one or fewer residential social service facilities, or tracts where the ratio of such facilities to households is lower than the citywide ratio.

All residential social service facilities are subject to these location restrictions. Beyond that, "group homes" for more than eight residents are not permitted in single-family districts.

Observation

The City of Massillon places buffer requirements on group homes and stipulates that they may only be established in "eligible" census tracts. These limitations impede the development of group homes for persons with disabilities and are inconsistent with the Fair Housing Act. The ordinance should be amended to treat "family homes" for persons with disabilities as it treats all other single-family residences. Additionally, the ordinance should be amended to clarify that family homes and group homes serve persons with all types of disabilities, not only developmental disabilities. The definition of persons with disabilities should mirror the Fair Housing Act.

D. Private Sector Policies

i. Mortgage Lending Practices

Under the terms of the Financial Institutions Reform, Recovery, and Enforcement Act of 1989 (F.I.R.R.E.A.), any commercial lending institution that makes five or more home mortgage loans must report all residential loan activity to the Federal Reserve Bank under the terms of the Home Mortgage Disclosure Act (HMDA). The HMDA regulations require most institutions involved in lending to comply and report information on loans denied, withdrawn, or incomplete by race, sex, and income of the applicant. The information from the HMDA statements assists in determining whether financial institutions are serving the housing needs of their communities. The data also helps to identify possible discriminatory lending practices and patterns.

The most recent HMDA data available for the City of Massillon is from 2007 to 2009. Reviewing this data helps to determine the need to encourage area lenders, other business lenders, and the community at large to actively promote existing programs and develop new programs to assist residents in securing home mortgage loans for home purchases. The data focus on the number of homeowner mortgage applications received by lenders for home purchase of one- to four-family dwellings and manufactured housing units in the City. The information provided is for the primary applicant only. Co-applicants were not included in the analysis. In addition, where no information is provided or categorized as not applicable, no analysis has been conducted due to lack of information. Figure 5-26 summarizes three years of HMDA data by race, ethnicity, and action taken on the applications, with detailed information to follow.

Figure 5-26
Summary Report Based on Action Taken Mortgage Data, 2007-2009

	2007		2008		2009	
	#	%	#	%	#	%
Mortgages applied for	**1,020**	**100.0%**	**575**	**100.0%**	**625**	**100.0%**
Black	33	3.2%	20	3.5%	9	1.4%
White	918	90.0%	509	88.5%	578	92.5%
Asian	9	0.9%	2	0.3%	9	1.4%
Hispanic*	6	0.6%	-	0.0%	8	1.3%
Other race	2	0.2%	1	0.2%	4	0.6%
No information/NA	58	5.7%	43	7.5%	25	4.0%
Mortgages originated	**753**	**73.8%**	**434**	**75.5%**	**492**	**78.7%**
Black	15	45.5%	13	65.0%	6	66.7%
White	705	76.8%	394	77.4%	458	79.2%
Asian	6	66.7%	2	100.0%	6	66.7%
Hispanic*	4	66.7%	-	N/A	8	100.0%
Other race	2	100.0%	-	0.0%	4	100.0%
No information/NA	25	43.1%	25	58.1%	18	72.0%
Mortgages denied	**134**	**13.1%**	**77**	**13.4%**	**71**	**11.4%**
Black	11	33.3%	5	25.0%	2	22.2%
White	103	11.2%	61	12.0%	63	10.9%
Asian	-	0.0%	-	0.0%	3	33.3%
Hispanic*	-	0.0%	-	N/A	-	0.0%
Other race	-	0.0%	1	100.0%	-	0.0%
No information/NA	20	34.5%	10	23.3%	3	12.0%

Note: Data is for home purchase loans for owner-occupied one-to-four family and manufactured units. Total applications do not include loans purchased by another institution. Other application outcomes include approved but not accepted, withdrawn and incomplete.
* Hispanic ethnicity is counted independently of race.
Source: Federal Financial Institutions Examination Council, 2007-09

The most obvious trend in 2007-09 HMDA data for Massillon is the steep drop in the number of loan applications from 2007 to 2008. This can be attributed primarily to stagnating home sales rates in the City that coincided with the national housing market crisis. The number of loan applications dropped by 445 (43.6%) from 2007 to 2008, then rebounded slightly in 2009, increasing by 50 (8.7%) in 2009.

Applications from White households, the largest race or ethnic group, fell 44.6% (409 applications) from 2007 to 2008, then rebounded 13.6% (69 applications) in 2009 along with overall applications. In comparison, applications from Black households, the second largest race or ethnic group and the largest minority group, continued to decline into 2009, dropping 72.7% (24 applications) over the three-year period. The proportion of Black applicants, already low in 2007 at 3.2%, fell further, dropping to 1.4% in 2009. This is far below the proportion of Black households among all Massillon households, which was 8.2% in 2009.[44]

Loan originations (i.e. approved loans) in Massillon followed the same overall pattern as applications, falling steeply from 753 in 2007 to 434 in 2008, a drop of 42.4%, and then rebounding slightly in 2009, rising to 492, an increase of 13.4%.

Denials, on the other hand, decreased continually over the three-year period, falling from 134, or 13.1% of all applications, in 2007 to 71, or 11.4% of all applications, in 2009.

The following sections contain detailed analysis for applications filed in 2009, the latest for which information is available.

Figure 5-27

Summary Report Based on Action Taken Mortgage Data, 2009

	Total Applications*		Originated		Approved Not Accepted		Denied		Withdrawn/ Incomplete	
	#	%	#	%	#	%	#	%	#	%
Loan Type										
Conventional	243	38.9%	198	81.5%	9	3.7%	24	9.9%	12	4.9%
FHA	360	57.6%	282	78.3%	15	4.2%	42	11.7%	21	5.8%
VA	19	3.0%	11	57.9%	3	15.8%	3	15.8%	2	10.5%
FSA/RHS	3	0.5%	1	33.3%	-	0.0%	2	66.7%	-	0.0%
Loan Purpose: Home Purchase										
One to four-family unit	616	98.6%	490	79.5%	23	3.7%	68	11.0%	35	5.7%
Manufactured housing unit	9	1.4%	2	22.2%	4	44.4%	3	33.3%	-	0.0%
Applicant Race										
American Indian/Alaska Native	3	0.5%	3	100.0%	-	0.0%	-	0.0%	-	0.0%
Asian/Pacific Islander	9	1.4%	6	66.7%	-	0.0%	3	33.3%	-	0.0%
Hawaiian	1	0.2%	1	100.0%	-	0.0%	-	0.0%	-	0.0%
Black	9	1.4%	6	66.7%	1	11.1%	2	22.2%	-	0.0%
Hispanic**	8	1.3%	8	100.0%	-	0.0%	-	0.0%	-	0.0%
White	578	92.5%	458	79.2%	25	4.3%	63	10.9%	32	5.5%
No information	25	4.0%	18	72.0%	1	4.0%	3	12.0%	3	12.0%
Not applicable	-	0.0%	-	N/A	-	N/A	-	N/A	-	N/A
Applicant Sex										
Male	420	67.2%	323	76.9%	18	4.3%	54	12.9%	25	6.0%
Female	182	29.1%	150	82.4%	8	4.4%	16	8.8%	8	4.4%
No information	23	3.7%	19	82.6%	1	4.3%	1	4.3%	2	8.7%
Not applicable	-	0.0%	-	N/A	-	N/A	-	N/A	-	N/A
Total	625	100.0%	492	78.7%	27	4.3%	71	11.4%	35	5.6%

Source: Federal Financial Institutions Examination Council, 2009

Note: Percentages in the Approved, Approved Not Accepted, Denied, and Withdrawn/Incomplete categories are calculated for each line item with the corresponding Total Applications figures. Percentages in the Total Applications categories are

* Total applications do not include loans purchased by another institution.

** Hispanic ethnicity is counted independently of race.

[44] 2005-09 American Community Survey Estimate: 1,073 Black households represented 8.2% of all 13,130 households in Massillon.

a. Conventional Loans vs. Government-Backed Loans

Loan types in 2009 included conventional mortgage loans and a variety of government-backed loans, including FHA and VA. Comparing these loan types helps to determine if the less stringent underwriting standards and lower down payment requirements of government-backed loans expand home ownership opportunities. In 2009, 61.1% (382) of households that applied for a mortgage loan applied for a government-backed loan. The rate of applications for government-backed loans was similar among minority households, with 60.0% (18 of 30 applications) applying for a government-backed loan. In 2009, the following loan types were recorded:

- FHA loans: 11.7% (42 of 360 applications).
- VA-guaranteed loans: 15.8%. (3 of 19 applications).
- Conventional loans: 9.9% (24 of 243 applications).
- FSA/RHS loans: 66.7% (2 of 3 applications).

b. Denial of Applications

In 2009, the mortgage applications of 71 households in Massillon were denied (11.4%). Denial reasons were given for 60 of these applications and included the following:

- Credit history: 19.7%
- Collateral: 18.3%
- Other: 14.1%
- Credit Application Incomplete: 11.3%
- Debt-to-income ratio: 9.9%
- Insufficient Cash: 7.0%
- Employment History: 2.8%
- Unverifiable information: 1.4%

Observation

Poor credit and high debt-to-income ratios were the two main reasons for mortgage denials. Even in an area with relatively affordable housing, low-moderate income households may not be able to obtain a home mortgage for these reasons.

Figure 5-28

Denials by Race and Ethnicity, 2007-2009

	2007			2008			2009		
	Total Apps**	Denials	Denial Rate	Total Apps**	Denials	Denial Rate	Total Apps**	Denials	Denial Rate
Am. Indian/Alaska Native	1	0	0.0%	1	1	100.0%	3	0	0.0%
Asian	9	0	0.0%	2	0	0.0%	9	3	33.3%
Black	33	11	33.3%	20	5	25.0%	9	2	22.2%
Haw aiian	1	0	0.0%	0	N/A	N/A	1	0	0.0%
White	918	103	11.2%	509	61	12.0%	578	63	10.9%
Not Provided	58	20	34.5%	43	10	23.3%	25	3	12.0%
Hispanic*	6	0	0.0%	0	N/A	N/A	8	0	0.0%

* Hispanic ethnicity is counted independently of race.

**Total applications do not include loans purchased by another institution

Between 2007 and 2009, the denial rates for Black applicants decreased. In 2007, the denial rate for Black applicants was triple that of White applicants, 33.3% for Blacks versus 11.2% for Whites. By 2009, as a result of the decreasing denial rate for Blacks, this gap closed, but the denial rate was still twice as high for Black applicants as for Whites: 22.2% versus 10.9%. However, caution should be used when interpreting these figures. Applications from Black applicants continually decreased over the three-year period and by 2009 there were only nine Black applicants. The number of applications submitted by other racial and ethnic groups is too small to reliably analyze the denial rate. The decreasing number of denials among Black applicants may also be a reflection of a decreasing number of mortgage loan applications, due to stricter lending requirements.

For this analysis, lower-income households include those with incomes between 0%-80% of MFI, while upper-income households include households with incomes above 80% MFI.

Lower-income households had a higher denial rate than upper-income households in each year from 2007 to 2009. This disparity was largest in 2008, when 20.2% of all applications from lower-income households were denied, versus 8.0% of applications from upper-income households. In 2009, denials fell for lower-income households and rose for upper-income households, decreasing the gap. That year, 12.8% of lower-income applications were denied versus 9.3% of upper-income applications.

Lower-income households have represented an increasingly large proportion of applications over the three-year period. In 2007, 40.2% of applications were submitted by lower-income households. By 2009, this figure rose to 50.2%.

Figure 5-29

Denials by Income, 2007-2009

	2007			2008			2009		
	Total Apps*	Denials	Denial Rate	Total Apps*	Denials	Denial Rate	Total Apps*	Denials	Denial Rate
Below 80% MFI	410	62	15.1%	247	50	20.2%	327	42	12.8%
At least 80% MFI	594	70	11.8%	313	25	8.0%	290	27	9.3%
Total	1020	134	13.1%	575	77	13.4%	625	71	11.4%

Note: Total includes applications for w hich no income data w as reported

*Total applications do not include loans purchased by other institutions

Given the low number of loan applications from racial and ethnic minorities, particularly in 2009, there are too few applications to reliably make comparisons between different racial or ethnic groups and/or different income levels.

Figure 5-30
Denials by Race for Lower-income Applicants, 2007-2009

	2007			2008			2009		
	Total Apps*	Denials	Denial Rate	Total Apps*	Denials	Denial Rate	Total Apps*	Denials	Denial Rate
Am. Indian/Alaska Native	0	N/A	N/A	0	N/A	N/A	1	0	0.0%
Asian	3	0	0.0%	0	N/A	N/A	5	2	40.0%
Black	17	5	29.4%	12	5	41.7%	7	1	14.3%
Hawaiian	1	0	0.0%	0	N/A	N/A	1	0	0.0%
White	369	49	13.3%	215	38	17.7%	298	36	12.1%
Not Provided	20	8	40.0%	20	7	35.0%	15	3	20.0%
Hispanic**	4	0	0.0%	0	N/A	N/A	4	0	0.0%
Total	410	62	15.1%	247	50	20.2%	327	42	12.8%

*Total applications do not include loans purchased by another institution
**Hispanic ethnicity is counted independently of race.

Overall, denial rates were lower for upper-income households than lower-income households in each of the three years. The following figure details applications for upper-income applicants by race and ethnicity. However, the number of applicants submitted by non-Whites is too small to reliably analyze.

Figure 5-31
Denials by Race for Upper-income Applicants, 2007-2009

	2007			2008			2009		
	Total Apps*	Denials	Denial Rate	Total Apps*	Denials	Denial Rate	Total Apps*	Denials	Denial Rate
Am. Indian/Alaska Native	1	0	0.0%	1	1	100.0%	2	0	0.0%
Asian	4	0	0.0%	2	0	0.0%	4	1	25.0%
Black	16	6	37.5%	8	0	0.0%	2	1	50.0%
Hawaiian	0	N/A	N/A	0	N/A	N/A	0	N/A	N/A
White	535	52	9.7%	281	21	7.5%	272	25	9.2%
Not Provided	38	12	31.6%	21	3	14.3%	10	0	0.0%
Hispanic**	2	0	0.0%	0	N/A	N/A	4	0	0.0%
Total	594	70	11.8%	313	25	8.0%	290	27	9.3%

*Total applications do not include loans purchased by another institution
**Hispanic ethnicity is counted independently of race.

ii. High-Cost Lending Practices

The widespread housing finance market crisis of recent years has brought a new level of public attention to lending practices that victimize vulnerable populations. Subprime lending, designed for borrowers who are considered a credit risk, has increased the availability of credit to low-income persons. At the same time, subprime lending has often exploited borrowers, piling on excessive fees, penalties and interest rates that make financial stability difficult to achieve. Higher monthly mortgage payments make housing less affordable, increasing the risk of mortgage delinquency and foreclosure and the likelihood that properties will fall into disrepair.

Some subprime borrowers have credit scores, income levels and down payments high enough to qualify for conventional, prime loans, but are nonetheless steered toward more expensive subprime mortgages. This is especially true of minority groups, which tend to fall disproportionately into the category of subprime borrowers. The practice of targeting minorities for subprime lending qualifies as mortgage discrimination.

Since 2005, Housing Mortgage Disclosure Act data has included price information for loans priced above reporting thresholds set by the Federal Reserve Board. This data is provided by lenders via Loan Application Registers and can be aggregated to complete an analysis of loans by lender or for a specified geographic area. HMDA does not require lenders to report credit scores for applicants, so the data does not indicate which loans are subprime. It does, however, provide price information for loans considered "high-cost."

A loan is considered high-cost if it meets one of the following criteria:

- A first-lien loan with an interest rate at least three percentage points higher than the prevailing U.S. Treasury standard at the time the loan application was filed. The standard is equal to the current price of comparable-maturity Treasury securities.
- A second-lien loan with an interest rate at least five percentage points higher than the standard.

Not all loans carrying high APRs are subprime, and not all subprime loans carry high APRs. However, high-cost lending is a strong predictor of subprime lending, and it can also indicate a loan that applies a heavy cost burden on the borrower, increasing the risk of mortgage delinquency.

a. Home Purchase Loans

In 2009, there were 492 home purchase loans made for single-family or manufactured housing units in Massillon. Of this total, 488 disclosed the borrower's household income and 37 (7.6%) reported high-cost mortgages. For lower- and upper-income households, high-cost loans decreased as a proportion of loan originations between 2007 and 2009. This could be due to policy changes that have limited subprime lending and/or to the necessity for lenders to make rates more competitive as the total number of applications dropped. Overall, lower-income households were more likely to have high-cost mortgages than upper-income households.

Blacks tend to receive high-cost loans more often than Whites. Across the three years analyzed, 16.7% of lower-income Blacks had a high-cost loan compared to 13.8% of lower-income White households. Similarly, among upper-income households, 18.1% of Blacks had high-cost loans, compared to 10.1% of Whites.

Figure 5-32

High-Cost Home Purchase Loans by Race/Ethnicity and Income, 2007-2009

		Lower Income			Upper Income		
		Total Originations	High-Cost	% High-Cost	Total Originations	High-Cost	% High-Cost
2007	Am. Indian/Alaska Native	0	N/A	N/A	1	0	0.0%
	Asian	2	2	100.0%	4	0	0.0%
	Black	7	2	28.6%	8	2	25.0%
	Haw aiian	1	0	0.0%	0	N/A	N/A
	White	271	44	16.2%	425	46	10.8%
	No information/NA	9	3	33.3%	16	1	6.3%
	Hispanic*	2	0	0.0%	2	0	0.0%
	Total	**290**	**51**	**17.6%**	**454**	**49**	**10.8%**
2008	Am. Indian/Alaska Native	0	N/A	N/A	0	N/A	N/A
	Asian	0	N/A	N/A	2	1	50.0%
	Black	6	0	0.0%	7	1	14.3%
	Haw aiian	0	N/A	N/A	0	N/A	N/A
	White	158	30	19.0%	230	25	10.9%
	No information/NA	11	0	0.0%	14	4	28.6%
	Hispanic*	0	N/A	N/A	0	N/A	N/A
	Total	**175**	**30**	**17.1%**	**253**	**31**	**12.3%**
2009	Am. Indian/Alaska Native	1	0	0.0%	2	0	N/A
	Asian	3	1	33.3%	3	0	0.0%
	Black	5	1	20.0%	1	0	0.0%
	Haw aiian	1	0	0.0%	0	0	N/A
	White	232	17	7.3%	222	18	8.1%
	No information/NA	11	0	0.0%	7	0	0.0%
	Hispanic*	4	0	0.0%	4	0	0.0%
	Total	**253**	**19**	**7.5%**	**235**	**18**	**7.7%**
Three-Year Totals		**718**	**100**	**13.9%**	**942**	**98**	**10.4%**

Note: Does not include loans for w hich no income data w as reported: 9 in 2007, 6 in 2008 and 4 in 2009.

* Hispanic ethnicity is counted independently of race.

Observation

Black households are disproportionately represented among recipients of high-cost home purchase loans.

Among all Blacks with mortgages between 2007 and 2009, 17.6% had high-cost loans. By comparison, only 11.7% of Whites had high-cost home purchase loans. This trend places the homes of minority households at greater risk for eviction, foreclosure and bankruptcy.

b. Refinancing Loans

This analysis also looks at high-cost lending among refinancing loans. A refinanced loan replaces an original mortgage and allows borrowers to take advantage of lower rates, switch from a variable to a fixed-rate mortgage, consolidate debt, and/or receive cash using the home's equity.

In Massillon in 2009, there were 886 refinancing loans and 775 for which income was reported. Of these, 65 (8.4%) were high-cost loans.

Similar to home purchase loans, Blacks tend to be over-represented in high-cost refinancing. Among refinancing loans from 2007 to 2009, 44.4% of lower-income Blacks had a high-cost loan compared to 17.3% of lower-income White households. Similarly, among upper-income households, 33.3% of Blacks had high-cost loans, compared to 15.5% of Whites.

Figure 5-33
High-Cost Refinancing Loans by Race/Ethnicity and Income, 2007-2009

		Lower Income			Upper Income		
		Total Originations	High-Cost	% High-Cost	Total Originations	High-Cost	% High-Cost
2007	Am. Indian/Alaska Native	1	1	100.0%	2	1	50.0%
	Asian	3	0	0.0%	3	1	33.3%
	Black	14	7	50.0%	17	7	41.2%
	Haw aiian	0	N/A	N/A	1	0	0.0%
	White	230	40	17.4%	419	95	22.7%
	No information/NA	27	15	55.6%	27	8	29.6%
	Hispanic*	1	0	0.0%	3	0	0.0%
	Total	**275**	**63**	**22.9%**	**469**	**112**	**23.9%**
2008	Am. Indian/Alaska Native	0	N/A	N/A	0	N/A	N/A
	Asian	0	N/A	N/A	1	0	0.0%
	Black	8	3	37.5%	9	3	33.3%
	Haw aiian	0	N/A	N/A	1	0	0.0%
	White	164	38	23.2%	238	46	19.3%
	No information/NA	15	7	46.7%	20	8	40.0%
	Hispanic*	1	0	0.0%	6	3	50.0%
	Total	**187**	**48**	**25.7%**	**269**	**57**	**21.2%**
2009	Am. Indian/Alaska Native	0	N/A	N/A	0	N/A	N/A
	Asian	1	0	0.0%	6	0	0.0%
	Black	5	2	40.0%	7	1	14.3%
	Haw aiian	0	N/A	N/A	0	N/A	N/A
	White	213	27	12.7%	469	33	7.0%
	No information/NA	22	1	4.5%	52	1	1.9%
	Hispanic*	1	0	0.0%	3	0	0.0%
	Total	**241**	**30**	**12.4%**	**534**	**35**	**6.6%**
Three-Year Totals		**703**	**141**	**20.1%**	**1,272**	**204**	**16.0%**

Note: Does not include loans for w hich no income data w as reported: 19 in 2007, 20 in 2008 and 111 in 2009.
* Hispanic ethnicity is counted independently of race.

Observation

Black households were more than twice as likely as Whites to have high-cost refinancing loans between 2007 and 2009.

Among all Blacks with mortgages between 2007 and 2009, 38.3% had high-cost loans. By comparison, 16.1% of Whites had high-cost refinancing loans.

E. Assessment of Current Fair Housing Policies, Programs, and Activities

i. Progress since Previous AI

The last AI for the ACMS region was completed in 2002. Seven region-wide impediments were identified in this study, including:

- Lack of knowledge about fair housing laws and enforcement,
- Insurance companies provide limited services or refuse to insure properties in older or less desirable neighborhoods,
- Segregated housing patterns,
- Difficulty finding landlords who accept Section 8 Vouchers,
- Limited funding that restricts the Section 8 program,
- Developers and builders who are not complying with multi-family accessibility provisions,
- Housing in need of major repairs, which LMI households cannot afford, and
- Minorities tend not to purchase outside of impacted areas and non-minorities do not pursue housing opportunities in neighborhoods that are predominately minority.

To address these impediments, the City of Massillon has undertaken the following activities:

- Through its Home Buyers Assistance program, the City provides financial assistance to LMI households and educates perspective home buyers on fair housing laws, homeowner's insurance, and housing opportunities in non-traditional areas.
- City staff attends meetings of neighborhood associations and the Stark County Real Estate Investor's Association to provide information on Fair Housing and Landlord/Tenant Laws.
- The City participated in "Help on the Spot" to educate residents on Fair Housing and Landlord/Tenant Laws as well as to market the City's housing programs.
- The City participates in regional initiatives such as the Stark County Housing Task Force, the Stark County Interagency Council on Homelessness and the Save Our Homes Coalition to prevent foreclosures in Stark County.

ii. Current Fair Housing Programs and Activities

The City of Massillon engages in a variety of programs and activities to affirmatively further fair housing. In terms of education and outreach, the City participates in home buyer's assistance trainings and conducts Landlord-Tenant and Fair Housing Law seminars. The City's Housing Department also receives about 70 calls every month requesting information regarding fair housing and landlord-tenant issues.

To enforce fair housing in Massillon, the City receives complaints and, when necessary, files them with the Ohio Civil Rights Commission. The City also conducts regular testing on questionable language in local classified real estate sections.

In its housing programs, such as home buyer assistance and rehabilitation programs, the City encourages participants to explore non-traditional areas (i.e. non-impacted areas). However, the City's most recent CAPERs do not discuss whether or not these strategies have been effective in promoting housing choice. The City could enhance its record-keeping by mapping the location of CDBG and HOME assistance provided to households. Such mapping would enable the City to evaluate its efforts to expand fair housing choice.

F. General Fair Housing Observations

This section of the AI is a summary of general observations included in earlier sections of the report. General observations include the results of primary and secondary research that define the underlying conditions, trends, and context for fair housing planning in Massillon. These observations in and of themselves do not necessarily constitute impediments to fair housing choice. Rather, they establish a contextual framework for the impediments to fair housing choice that are presented in the following section of the AI.

i. Demographics and Income

a. **Minorities increased from 10.1% to 12.5% of the total population between 1990 and 2010.** Blacks remain the largest minority group. However, the fastest growing segment of the population has been Asian/Pacific Islanders, which tripled during this period.

b. **There is one area of minority concentration of Black residents in Massillon.** Census tract 7142, where the percentage of Black residents is 38.3%, qualifies as an area of minority concentration. Additionally, tract 7143.01 has a relatively high proportion of Hispanic residents.

c. **Massillon is a moderately segregated city.** According to dissimilarity index data, 56.6% of Black persons would have to move to a different location in Massillon in order to achieve full integration.

d. **Blacks experienced poverty at twice the rate of Whites in Massillon in 2008.** The median household income for Blacks was equivalent to 69.2% of the income for Whites in 2008. Blacks also had a poverty rate of 35.2% compared to 11.5% for Whites. Consequently, Black households will have a more difficult time finding affordable housing.

e. **Of the 15 low and moderate income census tract block groups in Massillon, four are located within tract 7142, an area of concentration of Black residents. Tract 7142, by this definition, is an impacted area.**

f. **Persons with disabilities were more likely to live in poverty than persons without disabilities.** Among all persons with a disability in 2000, 15.4% lived in poverty, compared to 8.6% of persons without disabilities.

g. **Female-headed households with children were more likely to live in poverty.** Female-headed households with children accounted for more than half of all families living in poverty. Consequently, securing affordable housing will be especially difficult for this segment of the population.

h. **Members of the protected classes are represented in public decision making regarding housing issues via participation in appointed public volunteer boards.** The combined total of board members was 43% female and 29% Black. By comparison, Massillon's total population in 2010 was 9.8% Black. Additionally, the City's establishment of a Fair Housing Board is commendable.

ii. Housing

a. **Between January 2007 and June 2008, Massillon had a foreclosure rate of 9.7%.** Census tract 7142, an area of concentration of Black residents, had a foreclosure rate of 15.2%.

b. **Lower household incomes among Blacks are reflected in lower home ownership rates when compared to Whites.** Among Black households, 51.2% were home owners compared to 70.4% of White households..

c. **Black households were much more likely to live in larger families than White households.** Among Black families, 61.9% had three or more persons compared to 55.1% of White families. However, only 24.5% of the rental housing stock contains three or more bedrooms compared to 74.1% of the owner housing stock.

d. **Massillon lost over one-third of its units renting for less than $500 between 2000 and 2008.** By comparison, units renting for more than $1,000 increased ten-fold, from 21 to 242.

e. **Minimum-wage and single-income households cannot afford a housing unit renting for the HUD fair market rent in Massillon and Stark County.** Minorities and female-headed households will be disproportionately impacted because of their lower incomes.

f. **Persons with disabilities receiving a monthly SSI check of $674 as their sole source of income cannot afford a one-bedroom unit renting at the fair market rate of $510.**

g. **Due to a lower median household income, Black families on the whole have a lower maximum affordable home purchase price. This translates to fewer options for Black households when buying a home.** While White households could afford a maximum purchase price of $153,600, Black households were limited to a maximum purchase price of $102,400.

h. **Lower-income Black home owners experienced housing problems at greater rates than White home owners.** Among owner households, 58.5% of Blacks had housing problems, compared to 39.4% of Whites.

G. Potential Impediments and Recommendations

i. Public Sector

a. Due to the arrangement by which entitlement funds are allocated in the City of Massillon and Stark County and the limited availability of resources, the City's ability to use entitlement funds to create new housing opportunities in non-impacted areas is somewhat limited.

The City applies the CDBG entitlement dollars under its direct control to the improvement of public infrastructure, housing stock and the quality of life in impacted neighborhoods. However, these activities do not create new housing opportunities for members of the protected classes in non-impacted areas. The City's commitment to affirmatively further fair housing requires that it take meaningful steps to expand opportunity for these groups in non-impacted areas.

Recommended Action Step: Amend the Consolidated Plan to include a specific definition of areas of minority concentration, carrying the definition through future Annual Action Plans. Use the definition to balance entitlement spending between the revitalization of impacted areas and the creation of new housing opportunities in non-impacted areas.

Recommended Action Step: Continue to invest CDBG funds in ways that enhance and revitalize LMI areas and preserve and improve the existing housing stock.

Recommended Action Step: Work closely with the Stark County Regional Planning Commission to identify new HOME affordable rental housing project sites outside of impacted areas.

b. Due to the age and limited scope of the Future Land Use Plan, the City lacks a comprehensive housing policy document.

Massillon does not currently use comprehensive planning as a means of developing and implementing housing policy, using the five-year consolidated planning process instead as a means of identifying and serving housing needs. The consolidated planning process, by its definition in regulation, focuses on the housing needs of lower-income and special needs populations as they can be met using federal entitlement funds. A larger framework to define how the City envisions its layout and ideal housing supply and how it will prioritize and implement housing and land use policies would provide a more thoughtful planning context and an opportunity to ensure that all of the City's policies related to housing – not only its entitlement programs – are consistent with fair housing aims.

It is worth noting that the latest plan on record, developed in 1969, is not inconsistent with fair housing goals. The Future Land Use Plan supplies a brief and somewhat vague treatment of housing policy that proposes the expansion of multi-family housing opportunities and the use of denser multi-family residential areas to connect single-family neighborhoods with non-residential uses. These policies are still appropriate for a City of Massillon's development mix and demographic composition.

Recommended Action Step: Evaluate the feasibility of undertaking a comprehensive plan for the City of Massillon. Should resources allow for the development of a new plan, the City should include a statement to encompass its fair housing aims and ensure that the intent and effect of the housing policies established are consistent with that statement.

c. The City's zoning ordinance should be amended to expand opportunities for the development of affordable housing and to eliminate inconsistencies with the Fair Housing Act.

While multi-family housing currently exists in many areas of Massillon, the amount of land zoned and available for the development of additional multi-family housing is limited. The City's two multi-family zoning districts appear to have been drawn only to encompass existing apartment buildings, not to designate areas of the City where this type of development is appropriate. Multi-family housing represents an affordable housing option. Because members of the protected classes often have lower household incomes, limiting options for affordable housing may impede housing choice by individuals and families protected under federal, state and local fair housing statutes.

The zoning ordinance contains outdated nomenclature, such as "mentally retarded," that should be replaced with modern usages such as "persons with mental disabilities" or "persons with developmental disabilities" as appropriate.

The City's definition of "family" does not unduly restrict group homes for persons with disabilities, but it could be improved from a fair housing standpoint by focusing on whether a household functions as a cohesive unit rather than distinguishing between related and unrelated persons. A restrictive definition that limits the number or type of relationship between persons living together as a household unit in a single-family dwelling unit is incompatible with many modern living situations.

The ordinance *does* infringe upon the rights of group homes by imposing buffer requirements and stipulating that they may only be established in "eligible" tracts. The ordinance should be amended to treat "family homes" for persons with disabilities as it treats all other single-family residences. Additionally, the ordinance should be amended to clarify that family homes and group homes serve persons with all types of disabilities, not only developmental disabilities. The definition of persons with disabilities should mirror the Fair Housing Act.

Recommended Action Step: Update the zoning ordinance accordingly.

d. The City has not established an affirmative marketing policy.

Though the City typically does not apply CDBG resources to activities that would trigger compliance with affirmative marketing regulations, the City should adopt a general affirmative marketing policy for housing developments assisted by any City funds that contain five or more units. Outlining affirmative marketing requirements would clarify the City's policy stance on fair housing. It would also establish consistent procedure for any future CDBG activity affecting housing with five or more units.

Recommended Action Step: Draft and adopt an affirmative marketing policy per HUD regulations, including the following provisions:

- Methods for informing the public, owners and potential tenants about fair housing laws and the City's policies (for example, use of the Fair Housing logo or equal opportunity language)

- A description of what owners and/or the grantee will do to affirmatively market housing assisted with CDBG or other City funds
- A description of what owners and/or the City will do to inform persons not likely to apply for housing without special outreach
- Maintenance of records to document actions taken to affirmatively market CDBG-assistedunits and to assess marketing effectiveness, and
- Description of how efforts will be assessed and what corrective actions will be taken when requirements are not met.

ii. Private Sector

a. Patterns of subprime lending exist in Massillon. Among all Blacks with home purchase mortgages between 2007 and 2009, 17.6% had high-cost loans. By comparison, only 11.7% of Whites had high-cost home purchase loans. This trend places the homes of minority households at greater risk for eviction, foreclosure and bankruptcy. High-cost loans were more common in home refinancing, in which 38.3% of Blacks who refinanced between 2007 and 2009 received high-cost loans. By comparison, 16.1% of Whites had high-cost refinancing loans.

Recommended Action Step: Arrange housing counselors to provide credit repair advice on a public basis in order to ensure to the extent possible that members of the protected classes have access to means of improving their ability to obtain and maintain decent, affordable housing.

H. Fair Housing Action Plan

	Planned Action Year					
	2012	2013	2014	2015	2016	Responsible Entity
Establish an over-arching housing policy document for the City.						
Evaluate the feasibility of undertaking a comprehensive plan for the City of Massillon. Should resources allow for the development of a new plan, the City should include a statement to encompass its fair housing aims and ensure that the intent and effect of the housing policies established are consistent with that statement.			•			
Amend policy and program documents to affirmatively further fair housing						
Conduct the four-factor analysis outlined at www.lep.gov to determine the extent to which the translation of vital documents is necessary to assist persons with limited English proficiency in accessing County programs and services.	•					SCRPC
Draft and adopt an Affirmative Marketing Policy to apply to all City-supported housing projects with five or more units, per HUD guidelines.	•					
Amend the zoning ordinance the remove the potential impediments to the development of affordable housing identified in the AI. Additionally, remove outdated nomenclature and consider broadening the definition of "family." Amend the sections relevant to group homes for disabled persons to treat these facilities as single-family homes.		•				
Amend the Consolidated Plan to include a definition of areas of minority concentration. Carry the definition through each Annual Action Plan, using it as a frame of reference for balancing entitlement spending between the revitalization of impacted areas and the creation of new housing opportunities in non-impacted areas.	•					

cont'd …

	Planned Action Year					Responsible Entity
	2012	2013	2014	2015	2016	
Advance policies that expand the availability of affordable housing, particularly in non-impacted areas						
Continue to invest CDBG funds in ways that enhance and revitalize LMI areas and preserve and improve the existing housing stock.	•	•	•	•	•	
Work closely with SCRPC to identify new HOME affordable rental housing project sites outside of impacted areas.	•	•	•	•	•	
Expand incentives for property owners and investors to build new apartment buildings or substantially rehabilitate existing buildings for occupancy by lower-income families, specifically in non-concentrated areas.	•	•	•	•	•	
Expand community awareness and involvement in fair housing issues.						
Arrange housing counselors to provide credit repair advice on a public basis in order to ensure to the extent possible that members of the protected classes have access to means of improving their ability to obtain and maintain decent, affordable housing.	•	•	•	•	•	
Continue educational and outreach efforts to broaden awareness of rights and responsibilities under the Fair Housing Act.	•	•	•	•	•	

I. Signature Page for the City of Massillon

By my signature I certify that the Analysis of Impediments to Fair Housing Choice for the City of Massillon is in compliance with the intent and directives of the regulations of the Community Development Block Grant Program and HOME Investment Partnerships Program.

____

(Signature of Authorizing Official)

____

Date

6. Urban County

A. Demographic Profile

i. Population Trends

Between 1990 and 2009, the total population in the Urban County grew 9.3%, from 228,442 to 249,771 residents. Most of this growth occurred during the 1990s, when the population increased by 14,815 residents, or 6.5%. The Urban County continued to grow between 2000 and 2009, but at a slower rate of 2.7%. Diversity among residents of the Urban County increased during this period. In 1990, there were 6,382 non-White residents, representing 2.8% of the total population. By 2009, this number had more than doubled to 13,297, or 5.3% of the population.

Among non-White residents, diversity is also rising. In 1990, Black residents accounted for 73.4% of the minority population, and Asian/Pacific Islanders accounted for 16.9%. By 2009, the composition of the minority population had shifted. Black residents continued to represent the largest minority group, but their population share among all minorities shrank to 53.7%. The Asian/Pacific Islander population more than doubled and accounted for 21% of minority residents in 2009.

The number of Hispanic residents in the Urban County grew from 1,447 in 1990 to 2,453 in 2009, representing a population growth rate of 69.5%.

Figure 6-1
Population Trends, 1990-2009

	1990		2000		2009		% Change 1990-2009
	#	%	#	%	#	%	
Urban Stark County*	**228,442**	**100.0%**	**243,257**	**100.0%**	**249,771**	**100.0%**	**9.3%**
White Population	222,060	97.2%	232,645	95.6%	236,474	94.7%	6.5%
Non-White Population	6,382	2.8%	10,612	4.4%	13,297	5.3%	108.4%
Black	4,683	2.0%	5,776	2.4%	7,142	2.9%	52.5%
Amer. Indian/Alaska Native	388	0.2%	723	0.3%	399	0.2%	2.8%
Asian / Pacific Islander	1,079	0.5%	1,580	0.6%	2,796	1.1%	159.1%
Some Other Race	232	0.1%	413	0.2%	473	0.2%	103.9%
Two or More Races	---	---	2,120	0.9%	2,487	1.0%	17.3%
Hispanic	1,447	0.6%	1,943	0.8%	2,453	1.0%	69.5%

**The Urban County is Stark County exclusive of the Cities of Alliance, Canton, and Massillon*

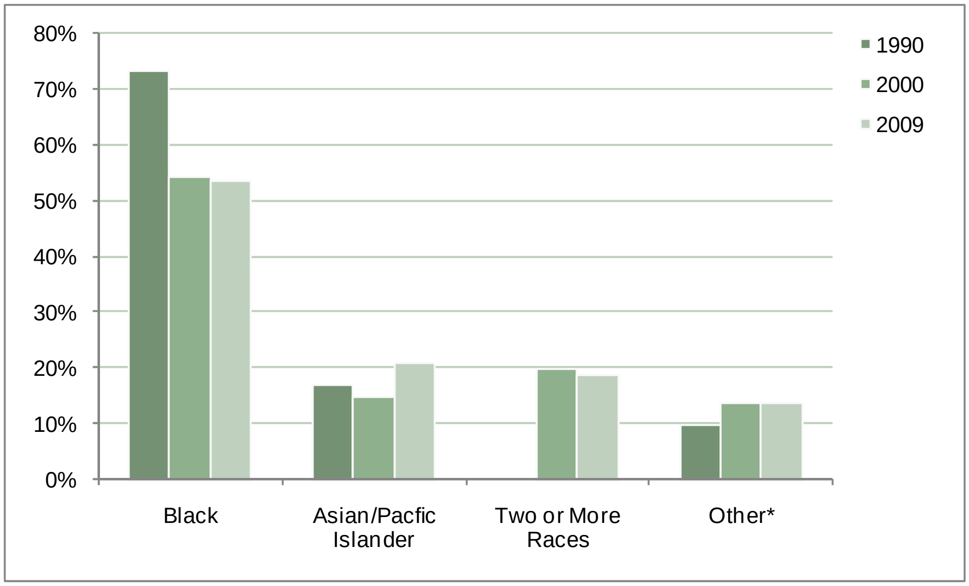
Source: Census 1990 and 2000, American Community Survey 2005-09

Observation

Minorities increased from 2.8% to 5.3% of the total population between 1990 and 2009.

Blacks remain the largest minority group. However, the fastest-growing two segments of the population have been Asian/Pacific Islanders and Hispanics, which increased 159.1% and 69.5%, respectively.

Figure 6-2
Changes in the Racial Characteristics of the Minority Population, 1990-2009



Note: The "Two or More Races" category did not exist in the 1990 Census.
*Other includes Alaska Natives/American Indians and Persons of Some Other Race

ii. Areas of Racial and Ethnic Minority Concentration

Stark County's Five-Year Consolidated Plan does not establish a specific threshold to define areas of racial or ethnic minority concentration. In the absence of specific definitions for "area of racial or ethnic concentration" in consolidated planning documents for the Urban County and the entitlement cities it contains, a generally accepted definition is applied throughout the AI: Concentrated geographical areas are those where the percentage of a specific minority or ethnic group is 10 percentage points higher than in the geographic area overall.

In the Urban County, Blacks comprised 2.5% of the population in 2009. Therefore, an area of racial concentration would include any census tract where the percentage of Black residents is 12.5% or higher. Two census tracts – 7002 and 7140 – meet this criterion. No census tracts qualified as areas where other racial or ethnic minority groups were concentrated. Furthermore, the population in four of the Urban County's census tracts was 100% White.

The composition of race and ethnicity by census tract is detailed in Figure 6-3.

Observation

There are two areas of minority concentration of Black residents in the Urban County.

Tract 7002, bordering northeast Canton and tract 7140, bordering northwest Massillon, are areas of concentration of Black residents.

Figure 6-3
Census Tract Population by Race and Hispanic Origin, 2009

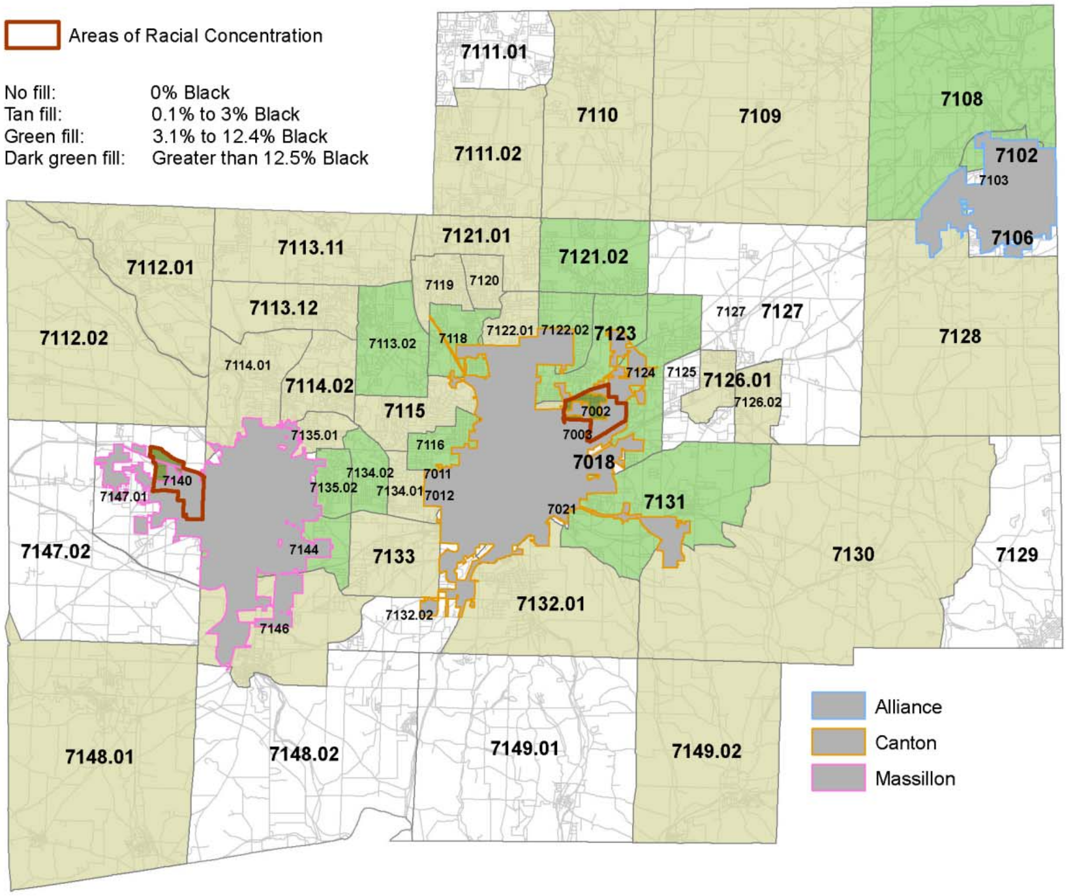
Census Tract	Total Population	White %	Minority Residents: Black %	Minority Residents: Asian/Pacific Islander %	Minority Residents: Hispanic %
Urban County**	**245,640**	**94.9%**	**2.5%**	**1.0%**	**1.0%**
7002*	1,345	78.1%	16.1%	0.0%	4.5%
7004*	876	93.5%	1.6%	0.0%	2.7%
7007*	0	---	---	---	---
7008*	0	---	---	---	---
7012*	0	---	---	---	---
7018*	18	100.0%	0.0%	0.0%	0.0%
7021*	0	---	---	---	---
7023*	0	---	---	---	---
7025*	0	---	---	---	---
7102*	889	95.8%	4.2%	0.0%	0.0%
7103*	414	100.0%	0.0%	0.0%	0.0%
7106*	406	100.0%	0.0%	0.0%	0.0%
7107*	0	---	---	---	---
7108*	4,301	91.3%	4.3%	1.3%	1.0%
7109	4,634	99.0%	0.3%	0.0%	4.6%
7110	7,270	96.9%	0.5%	0.2%	0.7%
7111.01	7,944	99.4%	0.0%	0.4%	0.6%
7111.02	10,588	96.4%	1.6%	0.6%	1.3%
7112.01	9,407	97.8%	1.6%	0.0%	0.2%
7112.02	4,074	96.0%	1.7%	0.9%	0.0%
7113.02	7,499	90.1%	5.4%	4.1%	2.7%
7113.11	7,723	93.3%	0.7%	2.5%	1.2%
7113.12	6,969	94.8%	0.7%	3.7%	1.2%
7114.01*	6,896	95.1%	0.6%	2.0%	0.3%
7114.02*	6,778	93.2%	2.9%	2.9%	0.6%
7115*	6,706	94.0%	1.8%	3.6%	0.8%
7116*	5,516	91.9%	5.8%	0.0%	0.9%
7117*	1,667	85.0%	11.3%	1.0%	0.0%
7118*	4,276	94.2%	4.0%	0.6%	0.0%
7119	4,837	98.3%	0.7%	1.0%	0.0%
7120	3,826	93.3%	1.2%	0.8%	0.0%

Census Tract	Total Population	White %	Minority Residents: Black %	Minority Residents: Asian/Pacific Islander %	Minority Residents: Hispanic %
7121.01	7,820	96.0%	1.3%	2.1%	0.9%
7121.02	7,171	92.7%	3.5%	0.3%	0.4%
7122.01*	4,186	93.2%	2.4%	1.3%	1.4%
7122.02*	3,664	89.3%	9.8%	0.0%	0.2%
7123*	5,681	88.4%	8.2%	1.0%	0.7%
7124*	5,238	91.5%	7.0%	0.0%	1.5%
7125	1,777	99.0%	0.0%	0.0%	2.8%
7126.01	2,921	97.7%	2.0%	0.0%	0.0%
7126.02	5,024	98.8%	0.6%	0.3%	0.5%
7127	4,816	99.5%	0.0%	0.0%	0.3%
7128*	4,466	97.7%	0.1%	1.1%	1.2%
7129	4,334	98.7%	0.0%	1.3%	0.0%
7130	4,210	92.0%	2.6%	0.2%	1.2%
7131*	6,102	87.1%	8.0%	0.3%	1.1%
7132.01*	7,317	94.0%	2.8%	0.0%	3.1%
7132.02	2,270	100.0%	0.0%	0.0%	0.0%
7133	4,849	94.7%	1.9%	2.1%	2.0%
7134.01	5,168	97.0%	2.5%	0.0%	1.1%
7134.02	4,411	92.0%	5.7%	0.8%	3.2%
7135.01*	4,060	92.6%	2.3%	2.1%	0.8%
7135.02*	5,424	93.3%	5.1%	0.0%	3.2%
7139*	---	---	---	---	---
7140*	177	80.8%	19.2%	0.0%	0.0%
7143.02*	102	100.0%	0.0%	0.0%	0.0%
7144*	1,128	94.3%	5.7%	0.0%	0.0%
7146*	4,323	98.0%	1.2%	0.0%	0.1%
7147.01*	3,403	99.2%	0.0%	0.0%	0.0%
7147.02	2,541	98.2%	0.0%	1.3%	0.0%
7148.01	7,015	98.5%	0.3%	0.1%	0.7%
7148.02	3,052	99.0%	0.0%	0.9%	0.6%
7149.01	4,322	98.8%	0.0%	0.1%	0.0%
7149.02	3,809	96.0%	2.7%	0.3%	0.1%

**Data reflects only the portion of the census tract within the Urban County*
***The Urban County is Stark County exclusive of the cities of Alliance, Canton, and Massillon*
Source: U.S. Census Bureau, 2005-2009 American Community Survey (C02003, B03001)

The following map depicts the geographic location of the areas of racial concentration. In the Urban County, the census tracts outlined in *red*, 7002 and 7140, are areas of concentration of Black residents, also referred to as impacted areas. It is within these impacted areas that other demographic characteristics — such as income and housing — will be analyzed.

Figure 6-4
Areas of Concentration of Black Residents, 2009



iii. Residential Segregation Patterns

Residential segregation is a measure of the degree of separation of racial or ethnic groups living in a neighborhood or community. Typically, the pattern of residential segregation involves the existence of predominantly homogenous, White suburban communities and low-income minority inner-city neighborhoods. A potential impediment to fair housing is created where either latent factors, such as attitudes, or overt factors, such as real estate practices, limit the range of housing opportunities for minorities. A lack of racial or ethnic integration in a community creates other problems, such as reinforcing prejudicial attitudes and behaviors, narrowing opportunities for interaction, and reducing the degree to which community life is considered harmonious. Areas of extreme minority isolation often experience poverty and social problems at rates that are disproportionately high. Racial segregation has been linked to diminished employment prospects, poor educational attainment, increased infant and adult mortality rates and increased homicide rates.

The distribution of racial or ethnic groups across a geographic area can be analyzed using an index of dissimilarity. This method allows for comparisons between subpopulations, indicating how much one group is spatially separated from another within a community. The index of dissimilarity is rated on a scale from 0 to 100, in which a score of 0 corresponds to perfect integration and a score of 100 represents total segregation.[45] The index is typically interpreted as the percentage of the minority population (in this instance, the Black population) that would have to move in order for a community or neighborhood to achieve full integration.

With a dissimilarity index of 39.1, the Urban County is moderately segregated. Among the four jurisdictions in the AI, the Urban County has the lowest degree of segregation, as detailed in Figure 6-5. The data indicates that in order to achieve full integration among White and Black residents, 39.1% of residents would have to move to another location within the Urban County.

[45] The index of dissimilarity is a commonly used demographic tool for measuring inequality. For a given geographic area, the index is equal to **1/2 Σ ABS [(b/B)-(a/A)]**, where b is the subgroup population of a census tract, B is the total subgroup population in a city, a is the majority population of a census tract, and A is the total majority population in the city. ABS refers to the absolute value of the calculation that follows.

Figure 6-5
Ohio Municipal Dissimilarity Index Rankings, 2000

Rank	City	Black Population	White Population	Total Population	Dissimilarity Index
1	**Urban County***	**4,517**	**213,757**	**222,203**	**39.1**
2	Alliance	2,287	20,099	23,458	48.0
3	Canton	16,875	59,653	80,806	50.0
4	Massillon	2,934	27,422	31,325	56.6

**Urban County is Stark County exclusive of the Cities of Alliance, Massillon, and Canton*
Source: CensusScope; U.S. Census Bureau 2000 Census; Calculations by Mullin & Lonergan Associates, Inc.

Observation

The Urban County is moderately segregated.

According to dissimilarity index data, 39.1% of Black persons would have to move to a different location in the Urban County in order to achieve full integration.

Dissimilarity index data for all Urban County subpopulations appears in the table below. The indices show that, in addition to a White/Black index of 39.1, the Urban County has a White/Asian index of 45.0, a White/multi-race index of 23.4, and a White/Hispanic index of 31.7. These numbers indicate that Asians and Whites are more segregated in the Urban County, and the other subpopulations are more integrated than Whites and Blacks. Perfect integration would receive an index score of 0. Indices for the other groups cannot be as reliably interpreted, since their populations are less than 1,000. In cases where subgroup population is small, the dissimilarity index may be high even if the group's members are evenly dispersed.

Figure 6-6
Urban County Dissimilarity Indices, 2000

	DI with White Population**	Population	% of Total Population
White	-	213,757	96.2%
Black	**39.1**	**4,517**	**2.0%**
American Indian/Alaska Native*	56.5	373	0.2%
Asian	**45.0**	**1,239**	**0.6%**
Hawaiian*	92.9	194	0.1%
Other*	37.4	430	0.2%
Two or more races	**23.4**	**1,842**	**0.8%**
Hispanic***	**31.7**	**1,789**	**0.8%**
TOTAL	-	222,230	100.0%

** In these cases, sample size is too small to reliably interpret the DI. Caution should be exercised in interpreting results for subpopulations of fewer than 1,000.*
*** Each dissimilarity index indicates the percentage of one of the two population groups compared that would have to move to different geographic locations (i.e., block groups) to create a completely even demographic distribution in the City.*
**** Hispanic ethnicity is counted independently of race*
Source: U.S. Census Bureau, 2000 Census; Calculations by Mullin & Lonergan Associates, Inc.

iv. Race/Ethnicity and Income

Household income is one of several factors used to determine a household's eligibility for a home mortgage loan. Median household income (MHI) in Stark County was $45,306 in 2008, and among White households MHI was $47,714. Among Black households, MHI was less than half of Whites, at $22,686. Overall Hispanic households earned more than Blacks, with MHI at $33,750, though this represents only 70.7% of the MHI of Whites.

As suggested by lower median incomes among Blacks and Hispanics, minority residents in Stark County experienced poverty at greater rates than White residents. Less than one in 10 White residents were living in poverty in 2008, compared with more than one in three Blacks. Among Hispanic residents, one in five were living in poverty.

Figure 6-7
Median Household Income and Poverty Rates by Race/Ethnicity, 2008

	Median Household Income	Poverty Rate
Stark County	**$45,306**	**11.9%**
Whites	$47,714	9.4%
Blacks	$22,686	37.4%
Hispanics	$33,750	20.3%

Note: Includes the Cities of Alliance, Canton, and Massillon

Source: U.S. Census Bureau, 2006-2008 American Community Survey (B19013, B19013A, B19013B, B19013D, B19013I)

Distribution of household income by race and ethnicity is comparable to the trends described above. A review of household income distribution also shows a disparity between White and non-White households in Stark County. Among White residents, households were relatively evenly distributed across income levels, with just over half (52.4%) earning less than $50,000 annually. By comparison, 53.3% of Black households and 41.1% of Hispanic households earned less than $25,000 per year. At the higher end of the scale, 26.6% of White households earned $75,000, compared to 11.5% of Blacks and 14.3% of Hispanics.

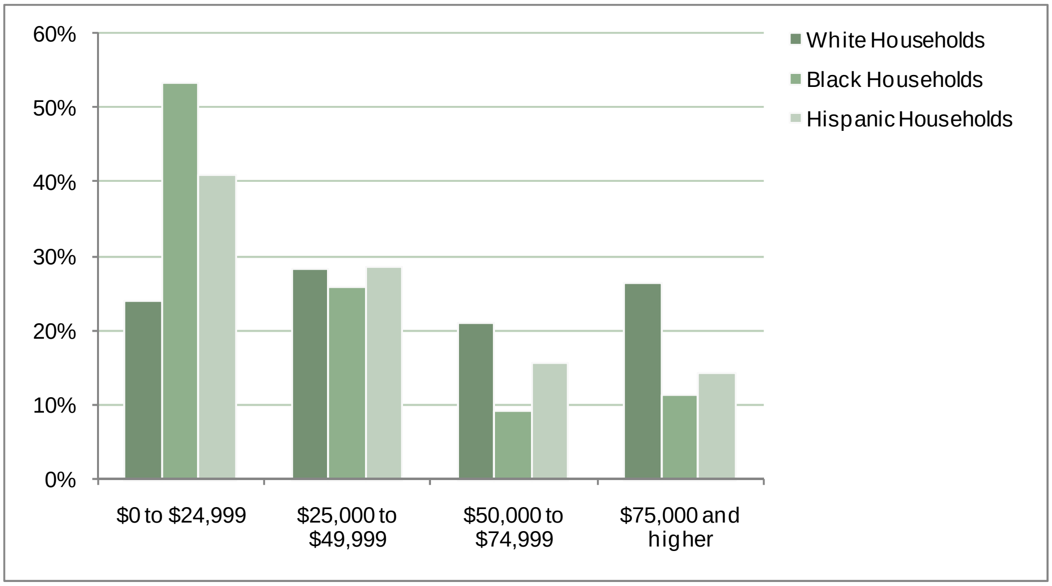
Figure 6-8
Household Income Distribution by Race and Ethnicity, 2008

		$0 to $24,999		$25,000 to $49,999		$50,000 to $74,999		$75,000 and higher	
	Total	#	%	#	%	#	%	#	%
All Households	**151,123**	**40,280**	**26.7%**	**42,029**	**27.8%**	**30,379**	**20.1%**	**38,435**	**25.4%**
White Households	136,638	32,993	24.1%	38,728	28.3%	29,011	21.2%	36,356	26.6%
Black Households	11,447	6,104	53.3%	2,964	25.9%	1,061	9.3%	1,318	11.5%
Hispanic Households	1,109	456	41.1%	319	28.8%	175	15.8%	159	14.3%

Note: Includes the Cities of Alliance, Canton, and Massillon

Source: U.S. Census Bureau, 2006-2008 American Community Survey (C19001, B19001A, B19001B)

Figure 6-9
Household Income Distribution by Race and Ethnicity, 2008



Observation

Blacks and Hispanics experienced poverty at much higher rates than Whites in the Urban County in 2008.

Median household income for Blacks was less than half of Whites, and Hispanics had a median income equivalent to 70.7% of Whites. Blacks and Hispanics also had poverty rates of 37.4% and 20.3%, respectively, compared to 9.4% for Whites. Consequently, Black and Hispanic households will have a more difficult time finding and sustaining affordable housing.

v. Concentrations of LMI Persons

The CDBG program includes a statutory requirement that at least 70% of funds invested benefit low and moderate income (LMI) persons. As a result, HUD provides the percentage of LMI persons in each census block group for entitlements such as the Urban County. HUD 2009 LMI estimates reveal that 40 of the 188 census block groups in the Urban County had at least 39.1% of residents who met the definition for LMI status.[46] These appear in Figure 6-10. Of these, two were located in census tracts 7002 and 7140, previously identified as areas of Black concentration. These qualify as impacted areas.

Figure 6-11 illustrates the location of LMI block groups in the Urban County. Areas of Black concentration are also highlighted.

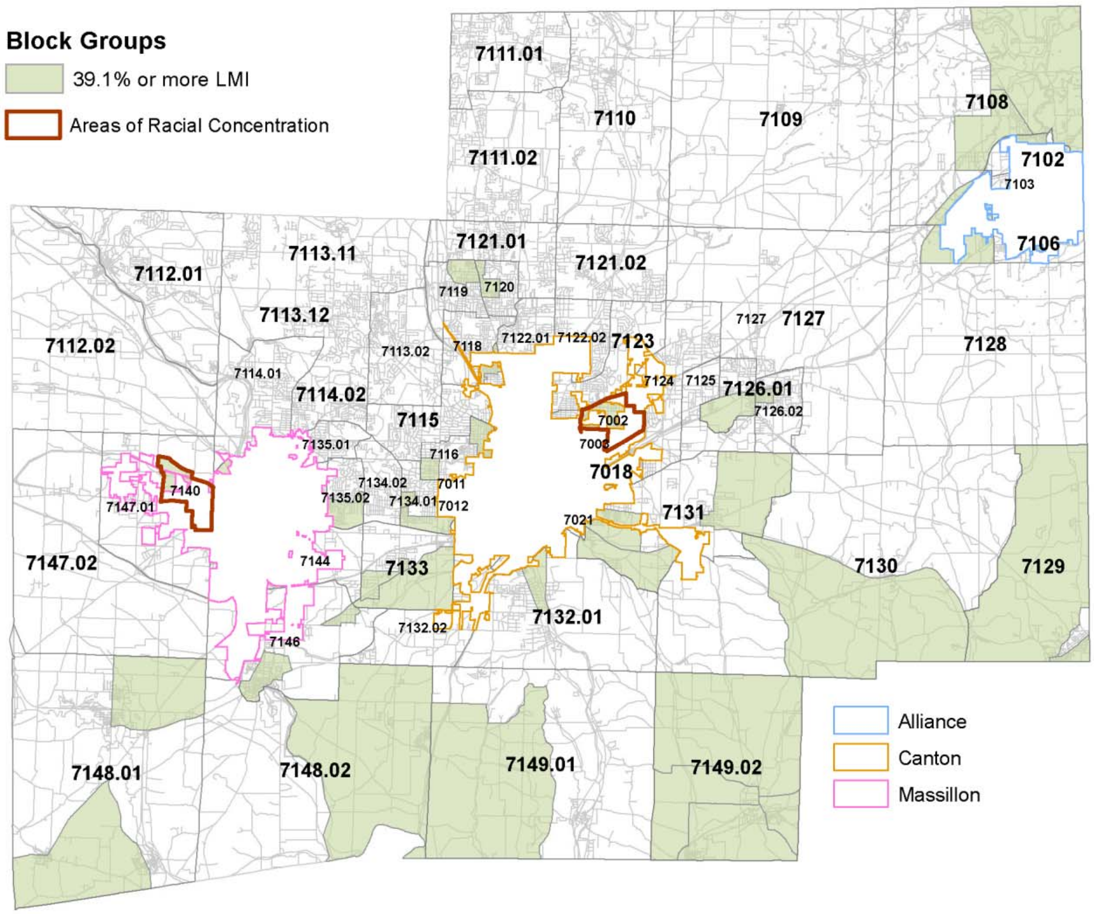
[46] This threshold is determined by HUD and represents the upper quartile of census block groups having the highest concentration of low and moderate income persons in the Urban County.

Figure 6-10
Low and Moderate Income Block Groups, 2010

Census Tract	Block Group	LMI persons Universe	#	%
7002	4	1,616	902	55.82%
7102.00	1	383	157	40.99%
7106	5	64	31	48.44%
7108.00	1	866	480	55.43%
7108	3	1,169	509	43.54%
7108.00	5	149	105	70.47%
7112.02	1	1,324	518	39.12%
7113.02	9	1,538	651	42.33%
7116	3	1,997	890	44.57%
7116	6	976	480	49.18%
7117	6	888	457	51.46%
7119	1	1,508	638	42.31%
7120	4	1,288	513	39.83%
7126.01	9	491	240	48.88%
7126.02	1	1,386	586	42.28%
7128	2	455	182	40.00%
7129	1	2,663	1,227	46.08%
7129	3	741	325	43.86%
7130	4	1,195	549	45.94%
7131	1	1,736	688	39.63%
7131	2	910	465	51.10%
7131	3	756	370	48.94%
7132.01	1	722	400	55.40%
7133	2	1,677	675	40.25%
7133	4	825	346	41.94%
7134.01	3	1,477	599	40.56%
7134.01	4	595	248	41.68%
7135.02	1	2,454	1,038	42.30%
7139	1	45	32	71.11%
7140	3	137	61	44.53%
7146	1	611	321	52.54%
7146	3	1,791	770	42.99%
7148.01	1	1,606	685	42.65%
7148.01	4	1,236	642	51.94%
7148.02	1	2,015	1,119	55.53%
7149.01	4	860	361	41.98%
7149.02	1	1,203	653	54.28%
7149.02	2	503	245	48.71%
7149.02	3	551	268	48.64%
7149.02	4	1,422	613	43.11%

Source: 2009 HUD LMI Estimates

Figure 6-11
Distribution of LMI Block Groups, 2010



vi. Disability and Income

As defined by the Census Bureau, a disability is a long-lasting physical, mental, or emotional condition that can make it difficult for a person to do activities such as walking, climbing stairs, dressing, bathing, learning, or remembering. This condition can also impede a person from being able to go outside the home alone or to work at a job or business.

The Fair Housing Act prohibits discrimination based on physical, mental or emotional handicap, provided "reasonable accommodation" can be made. Reasonable accommodation may include changes to address the needs of disabled persons, including adaptive structural (e.g., constructing an entrance ramp) or administrative changes (e.g., permitting the use of a service animal). In the Urban County, 15.5% of the population 5 years and older reported at least one type of disability in 2000.[47]

According to the National Organization on Disabilities, a significant income gap exists for persons with disabilities, given their lower rate of employment. In the

[47] U.S. Census Bureau, Census 2000 (SF 3, P42)

Urban County, persons with disabilities were twice as likely as persons without disabilities to live in poverty. In 2000, 8.2% of persons with disabilities lived in poverty compared to 4.1% of persons without disabilities who were living in poverty.[48]

Observation

Persons with disabilities were twice as likely to live in poverty as persons without disabilities.

Among all persons with a disability in 2000, 8.2% lived in poverty compared to 4.1% of persons without disabilities.

vii. Familial Status and Income

The Census Bureau divides households into family and non-family households. Family households are married couple families with or without children, single-parent families and other families made up of related persons. Non-family households are either single persons living alone, or two or more non-related persons living together.

Women have protection under Title VIII of the Civil Rights act of 1968 against discrimination in housing. Protection for families with children was added in the 1988 amendments to Title VIII. Except in limited circumstances involving elderly housing and owner-occupied buildings of one to four units, it is unlawful to refuse to rent or sell to families with children.

In the Urban County, female-headed households grew from 7.3% of all households in 1990 to 8.8% in 2008, and female-headed households with children increased from 3.7% to 5.1%. Similarly, the proportion of male-headed households with children more than doubled from 1.0% in 1990 to 2.3% in 2008. By comparison, married-couple family households with children declined from 30.3% to 22.1% during the same period.

[48] U.S. Census Bureau, Census 2000 (SF 3, PCT34)

Figure 6-12
Female-headed Households and Households with Children, 1990-2008

	1990		2000		2008	
	#	%	#	%	#	%
Total Households	**84,974**	**100.0%**	**94,107**	**100.0%**	**98,604**	**100.0%**
Family Households	65,828	77.5%	69,084	73.4%	69,479	70.5%
Married-couple family	57,457	67.6%	58,308	62.0%	57,161	58.0%
With Children	25,719	30.3%	24,608	26.1%	21,825	22.1%
Without Children	31,738	37.4%	33,700	35.8%	35,336	35.8%
Female-Headed Households	**6,213**	**7.3%**	**7,697**	**8.2%**	**8,661**	**8.8%**
With Children	**3,125**	**3.7%**	**3,951**	**4.2%**	**5,042**	**5.1%**
Without Children	3,088	3.6%	3,746	4.0%	3,619	3.7%
Male-Headed Household	2,158	2.5%	3,079	3.3%	3,657	3.7%
With Children	849	1.0%	1,625	1.7%	2,270	2.3%
Without Children	1,209	1.4%	1,454	1.5%	1,387	1.4%
Non-family and 1-person Households	19,146	22.5%	25,023	26.6%	29,125	29.5%

Sources: U.S. Census Bureau, 1990 (SFT-3, DP-1), Census 2000 (SF-3, H16); 2006-2008 American Community Survey (B11003)

Female-headed households with children often experience difficulty in obtaining housing, primarily as a result of lower-incomes and the unwillingness of some landlords to rent their units to families with children. Although they comprised less than 5% of families in the Urban County in 2000, female-headed households with children accounted for 40.3% of all families living in poverty in the Urban County.[49] Among female-headed households with children, 22.5% were living in poverty compared to 2.4% of married-couple families with children.

Observation

Female-headed households with children were far more likely to live in poverty.

Female-headed households with children comprised over 40% of all families living in poverty and were ten times as likely to live in poverty as married-couple families with children. Consequently, securing affordable housing will be especially difficult for this segment of the population.

viii. Ancestry and Income

It is illegal to refuse the right to housing based on place of birth or ancestry. Census data on native and foreign-born populations reported that in 2008, 2.3% of Urban County residents were foreign-born.[50]

In 2008, families with children living with one or more foreign-born were less likely to have incomes less than 200% of the poverty level than families with only native parents. Among families with one or more foreign-born parent, 26.5% lived under

[49] U.S. Census Bureau, Census 2000 (SF-3, P90)
[50] U.S. Census Bureau, American Community Survey 2006-2008 (C05002)

200% of the poverty level. By comparison, 34.4% of families with only native-born parents lived at this income level.[51]

Persons with limited English proficiency (LEP) are defined by the federal government as persons who have a limited ability to read, write, speak or understand English. HUD issued its guidelines on how to address the needs of persons with LEP in January 2007. HUD uses the prevalence of persons with LEP to identify the potential for impediments to fair housing choice due to their inability to comprehend English. Persons with LEP may encounter obstacles to fair housing by virtue of language and cultural barriers within their new environment. To assist these individuals, it is important that a community recognizes their presence and the potential for discrimination, whether intentional or inadvertent, and establishes policies to eliminate barriers. It is also incumbent upon HUD entitlement communities to determine the need for language assistance and comply with Title VI of the Civil Rights Act of 1964.

American Community Survey (ACS) data indicate that more than 4,000 people across Stark County have limited English proficiency.[52] This population may need special accommodation to ensure fair access to County programs and services.

Observation

In 2008, the Census Bureau reported that 4,149 persons in Stark County (including the Cities of Alliance, Canton, and Massillon) spoke English less than “very well.” Of these, 1,474 (35.4%) were Spanish speakers and 1,849 (44.4%) spoke other indo-European languages.

ix. Protected Class Status and Unemployment

In 2008, unemployment rates in the Urban County were lower than those throughout Stark County and Ohio. In the Urban County, unemployment was 5.1%, compared to 7.1% in Stark County and a statewide unemployment rate of 7.0%. Women experienced unemployment at lower rates than men, with 4.5% of women unemployed compared to 5.7% of men. Unemployment among minority groups was not available for the Urban County. However, for all of Stark County, Black residents were more than three times as likely to be unemployed than White residents, with unemployment rates of 19.6% and 6.1%, respectively.

[51] U.S. Census Bureau, American Community Survey 2006-2008 (C05010)
[52] U.S. Census Bureau, 2006-2008 American Community Survey (C16005)

Figure 6-13
Civilian Labor Force, 2008

	Ohio Total	%	Stark County Total	%	Urban County Total	%
Total Civilian Labor Force (CLF)	**5,906,242**	**100%**	**196,756**	**100%**	**132,665**	**100%**
Employed	5,490,147	93.0%	182,735	92.9%	125,876	94.9%
Unemployed	416,095	7.0%	14,021	7.1%	6,789	5.1%
Male CLF	**3,079,988**	**100.0%**	**101,088**	**100.0%**	**68,836**	**100.0%**
Employed	2,853,623	92.7%	93,260	92.3%	64,942	94.3%
Unemployed	226,365	7.3%	7,828	7.7%	3,894	5.7%
Female CLF	**2,826,254**	**100.0%**	**95,668**	**100.0%**	**63,829**	**100.0%**
Employed	2,636,524	93.3%	89,475	93.5%	60,934	95.5%
Unemployed	189,730	6.7%	6,193	6.5%	2,895	4.5%
White CLF	**5,071,904**	**100%**	**180,019**	**100%**	**127,578**	**100%**
Employed	4,766,453	94.0%	168,958	93.9%	121,073	94.9%
Unemployed	305,451	6.0%	11,061	6.1%	6,505	5.1%
Black CLF	**619,629**	**100%**	**12,343**	**100%**	**---**	**---**
Employed	526,938	85.0%	9,926	80.4%	---	---
Unemployed	92,691	15.0%	2,417	19.6%	---	---

Source: U.S. Census Bureau, 2006-2008 American Community Survey (C23001, C23002A, C23002B, C23002D, C23002I)

Observation

Blacks were three times as likely to be unemployed as Whites in Stark County in 2008.

Almost 20% of Blacks were unemployed in 2008 compared to 6.1% of Whites. Higher unemployment, whether temporary or permanent, will mean less disposable income for housing expenses.

B. Housing Market

i. Housing Inventory

The housing stock in the Urban County increased by 15,213 units, or 17.6%, between 1990 and 2009.

In 14 census tracts, the total housing stock decreased during this period, as highlighted in Figure 6-14. One of the tracts that experienced decline (7002) was also identified as an area of minority concentration and also contains an impacted block group. The areas of greatest gain were north of Canton and Massillon, where significant developable land exists. Most rural census tracts in the Urban County demonstrated a modest expansion in housing stock, primarily limited by the presence of public water and sewer service.

Figure 6-15 depicts the location of the areas where higher rates of new housing development occurred since 1990.

Figure 6-14
Trends in Total Housing Units, 1990-2009

Census Tract	1990		2000		2009		Change 1990-2009	
	#	% of Total Housing Units	#	% of Total Housing Units	#	% of Total Housing Units	#	% of Total Housing Units
Urban County	**86,454**	**100.0%**	**98,367**	**100.0%**	**101,667**	**100.0%**	**15,213**	**17.6%**
7002*	614	0.7%	650	0.7%	579	0.6%	-35	-5.7%
7004*	330	0.4%	352	0.4%	371	0.4%	41	12.4%
7007*	0	0.0%	0	0.0%	0	0.0%	0	0.0%
7008*	0	0.0%	0	0.0%	0	0.0%	0	0.0%
7012*	0	0.0%	0	0.0%	0	0.0%	0	0.0%
7018*	12	0.0%	3	0.0%	18	0.0%	6	50.0%
7021*	0	0.0%	0	0.0%	0	0.0%	0	0.0%
7023*	8	0.0%	7	0.0%	0	0.0%	-8	-100.0%
7025*	0	0.0%	0	0.0%	0	0.0%	0	0.0%
7102*	313	0.4%	336	0.3%	372	0.4%	59	18.8%
7103*	73	0.1%	104	0.1%	125	0.1%	52	71.2%
7106*	269	0.3%	243	0.2%	196	0.2%	-73	-27.1%
7107*	6	0.0%	0	0.0%	0	0.0%	-6	-100.0%
7108*	1,541	1.8%	1,745	1.8%	1,772	1.7%	231	15.0%
7109	1,366	1.6%	1,568	1.6%	1,623	1.6%	257	18.8%
7110	2,625	3.0%	2,818	2.9%	2,637	2.6%	12	0.5%
7111.01**	5,206	6.0%	3,269	3.3%	3,032	3.0%	-2,174	-41.8%
7111.02**	---	---	3,339	3.4%	3,837	3.8%	---	---
7112.01**	2,823	3.3%	3,385	3.4%	3,626	3.6%	803	28.4%
7112.02	---	---	1,580	1.6%	1,644	1.6%	---	---
7113.01	4,000	4.6%	---	---	---	---	---	---
7113.02	3,151	3.6%	3,570	3.6%	3,697	3.6%	546	17.3%
7113.11**	---	---	2,590	2.6%	2,957	2.9%	---	---
7113.12**	---	---	2,264	2.3%	2,563	2.5%	---	---
7114.01**	3,799	4.4%	2,323	2.4%	2,657	2.6%	-1,142	-30.1%
7114.02**	---	---	2,800	2.8%	3,156	3.1%	---	---
7115*	3,426	4.0%	3,589	3.6%	3,656	3.6%	230	6.7%
7116*	2,861	3.3%	2,876	2.9%	2,892	2.8%	31	1.1%
7117*	848	1.0%	868	0.9%	884	0.9%	36	4.2%
7118*	1,958	2.3%	2,065	2.1%	2,006	2.0%	48	2.5%
7119	2,552	3.0%	2,585	2.6%	2,364	2.3%	-188	-7.4%
7120	1,749	2.0%	1,830	1.9%	1,717	1.7%	-32	-1.8%
7121.01	2,584	3.0%	3,448	3.5%	3,446	3.4%	862	33.4%
7121.02	2,125	2.5%	2,605	2.6%	2,811	2.8%	686	32.3%
7122.01*	906	1.0%	1,180	1.2%	1,508	1.5%	602	66.4%
7122.02*	1,155	1.3%	1,523	1.5%	1,410	1.4%	255	22.1%
7123*	2,491	2.9%	2,638	2.7%	2,587	2.5%	96	3.9%
7124*	1,538	1.8%	1,854	1.9%	1,880	1.8%	342	22.2%
7125	643	0.7%	743	0.8%	711	0.7%	68	10.6%
7126.01	1,048	1.2%	1,059	1.1%	1,211	1.2%	163	15.6%
7126.02	1,841	2.1%	2,019	2.1%	2,097	2.1%	256	13.9%
7127	1,636	1.9%	1,775	1.8%	1,853	1.8%	217	13.3%

Trends in Total Housing Units, 1990-2009 (cont'd)

Census Tract	1990		2000		2010		Change 1990-2010	
	#	% of Total Housing Units	#	% of Total Housing Units	#	% of Total Housing Units	#	% of Total Housing Units
7128*	1,485	1.7%	1,611	1.6%	1,681	1.7%	196	13.2%
7129	1,754	2.0%	1,766	1.8%	1,886	1.9%	132	7.5%
7130	1,341	1.6%	1,493	1.5%	1,576	1.6%	235	17.5%
7131*	2,349	2.7%	2,450	2.5%	2,607	2.6%	258	11.0%
7132.01*	2,827	3.3%	2,961	3.0%	2,961	2.9%	134	4.7%
7132.02	788	0.9%	854	0.9%	869	0.9%	81	10.3%
7133	1,745	2.0%	1,844	1.9%	1,980	1.9%	235	13.5%
7134.01	2,229	2.6%	2,311	2.3%	2,369	2.3%	140	6.3%
7134.02	1,823	2.1%	1,946	2.0%	1,913	1.9%	90	4.9%
7135.01**	3,726	4.3%	1,631	1.7%	1,777	1.7%	-1,949	-52.3%
7135.02**	---	---	2,292	2.3%	2,337	2.3%	---	---
7139*	19	0.0%	9	0.0%	0	0.0%	-19	-100.0%
7140*	29	0.0%	68	0.1%	58	0.1%	29	100.0%
7143.02*	60	0.1%	53	0.1%	40	0.0%	-20	-33.3%
7144*	378	0.4%	372	0.4%	369	0.4%	-9	-2.4%
7146*	1,786	2.1%	1,893	1.9%	1,909	1.9%	123	6.9%
7147.01*	1,363	1.6%	1,303	1.3%	1,253	1.2%	-110	-8.1%
7147.02	895	1.0%	961	1.0%	951	0.9%	56	6.3%
7148.01**	3,471	4.0%	2,556	2.6%	2,628	2.6%	-843	-24.3%
7148.02**	---	---	1,229	1.2%	1,359	1.3%	---	---
7149.01	1,510	1.7%	1,676	1.7%	1,779	1.7%	269	17.8%
7149.02	1,379	1.6%	1,485	1.5%	1,470	1.4%	91	6.6%

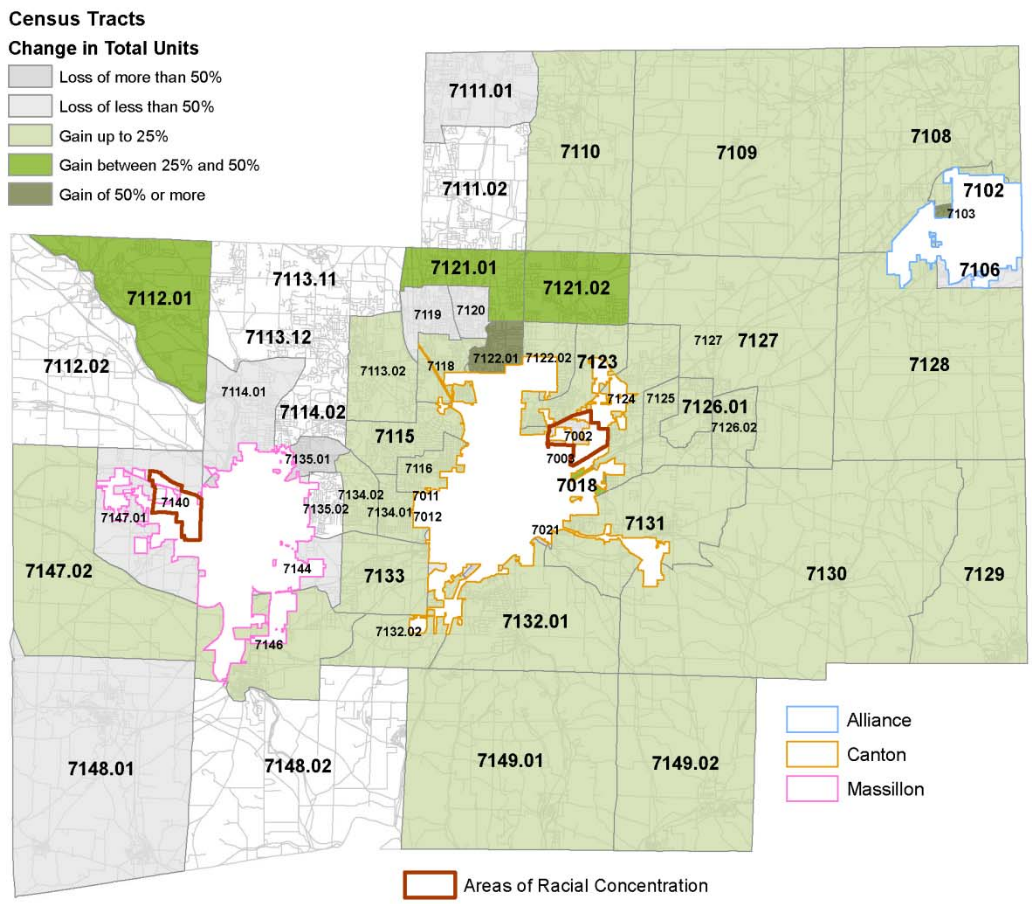
**Data reflects only the portion of the census tract within the Urban County*

***Census tracts boundaries changed and split between Census 1990 and Census 2000. Data reflects information for the respective census year.*

Note: the Urban County is Stark County exclusive of the Cities of Alliance, Canton, and Massillon

Source: U.S. Census Bureau

Figure 6-15
Change in Total Housing Units per Census Tract, 1990 – 2009



Note: Unshaded tracts outside of the three cities represent areas where, due to changes in census tract boundaries between 1990 and 2000, change cannot be reliably calculated.

ii. Types of Housing Units

In 2000, single-family units comprised 79.8% of the housing stock in the Urban County, and multi-family units comprised 16.8%. Mobile homes accounted for the remaining 3.4%.

In nine census tracts, multi-family units comprised more than one-fourth of the housing stock, as highlighted in Figure 6-16. Most of these tracts are contiguous to or otherwise near the City of Canton.

In seven census tracts, mobile homes accounted for more than 10% of the housing stock. These areas are also highlighted.

Both of the two census tracts identified as areas of Black concentration, 7002 and 7140, were dominated by single-family units. In tract 7002, 604 of 650 total housing units were single-family (92.9%), while in tract 7140, 51 of 68 (75%) were single-family.

Figure 6-16
Trends in Housing Units in Structures, 2000

Census Tract	Total Units	Single-family units (detached and attached)	Multi-family units					Mobile home
			2 to 4	5 to 9	10 to 19	20 or more	Total	
Urban County**	**98,367**	**105,360**	**11,155**	**4,242**	**2,662**	**2,062**	**20,121**	**5,620**
7002*	650	604	0	11	0	0	11	35
7004*	352	279	45	18	10	0	73	0
7007*	0	0	0	0	0	0	0	0
7008*	0	0	0	0	0	0	0	0
7012*	0	0	0	0	0	0	0	0
7018*	3	3	0	0	0	0	0	0
7021*	0	0	0	0	0	0	0	0
7023*	7	7	0	0	0	0	0	0
7025*	0	0	0	0	0	0	0	0
7102*	336	243	37	0	0	0	37	56
7103*	104	42	57	0	0	0	57	5
7106*	243	234	9	0	0	0	9	0
7107*	0	0	0	0	0	0	0	0
7108*	1,745	1,585	70	0	20	33	123	37
7109	1,568	1,406	75	0	42	0	117	45
7110	2,818	2,285	302	167	58	6	533	0
7111.01	3,269	3,018	190	0	0	0	190	61
7111.02	3,339	2,785	378	104	7	33	522	26
7112.01	3,385	2,655	461	134	58	49	702	20
7112.02	1,580	1,355	57	0	0	0	57	168
7113.02	3,570	2,096	162	557	372	383	1,474	0
7113.11	2,590	2,401	135	26	21	0	182	7
7113.12	2,264	1,950	233	81	0	0	314	0
7114.01*	2,323	2,134	104	70	7	0	181	8
7114.02*	2,800	1,770	476	208	213	133	1,030	0
7115*	3,589	2,439	243	361	252	294	1,150	0
7116*	2,876	2,255	420	98	33	-34	517	50
7117*	868	595	74	135	-10	5	204	33
7118*	2,065	1,444	182	166	210	153	711	0
7119	2,585	1,595	304	278	118	90	790	192
7120	1,830	1,470	144	90	31	95	360	0
7121.01	3,448	2,177	277	322	437	235	1,271	0
7121.02	2,605	2,248	196	95	38	0	329	28
7122.01*	1,180	1,113	33	0	34	0	67	0
7122.02*	1,523	1,384	28	89	0	22	139	0
7123*	2,638	2,066	270	93	70	10	443	129
7124*	1,854	1,523	88	58	0	38	184	147
7125	743	694	42	0	0	0	42	7
7126.01	1,059	654	259	128	13	0	400	5
7126.02	2,019	1,590	381	9	0	39	429	0
7127	1,775	1,515	87	132	34	0	253	7

Trends in Housing Units in Structures, 2000 (cont'd)

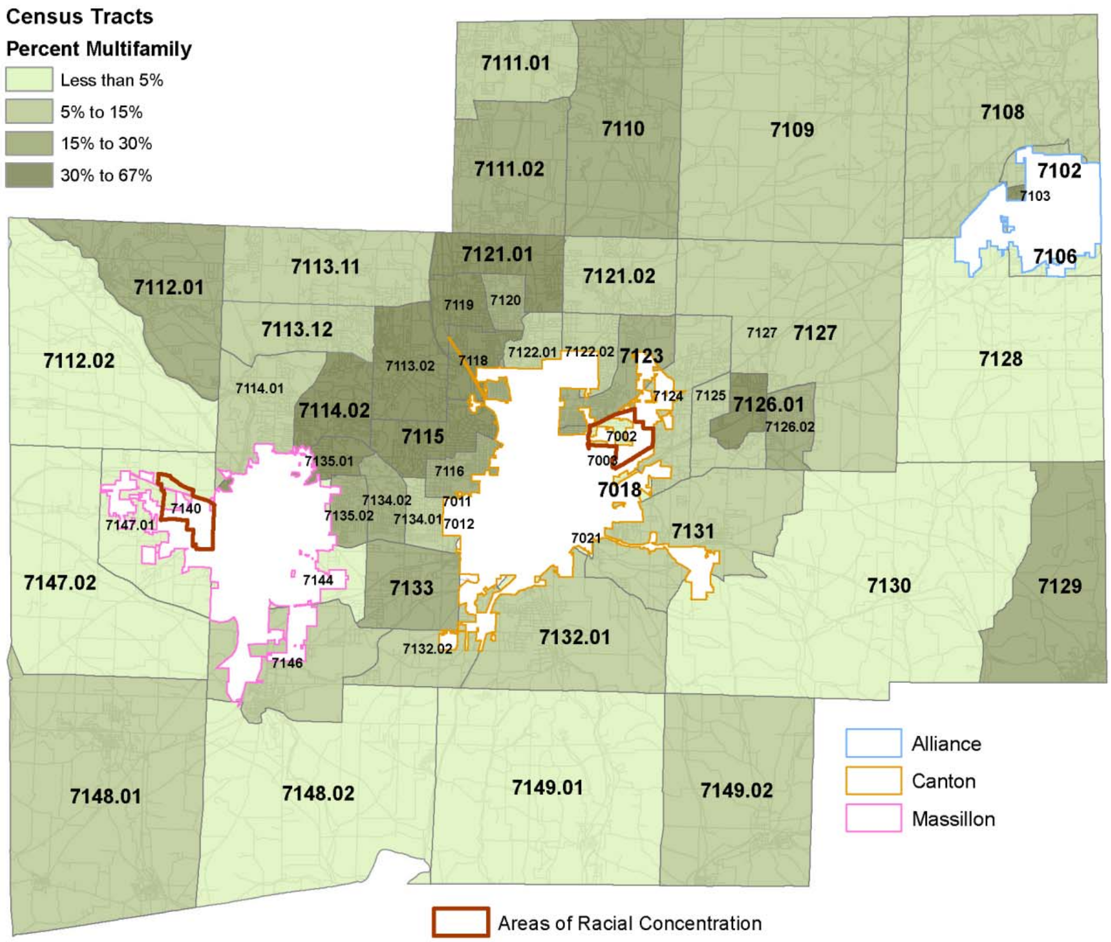
Census Tract	Total Units	Single-family units (detached and attached)	Multi-family units					Mobile home
			2 to 4	5 to 9	10 to 19	20 or more	Total	
Urban County**	**32,764**	**26,873**	**2,668**	**406**	**297**	**239**	**3,610**	**2,277**
7128*	1,611	1,527	57	13	8	0	78	6
7129	1,766	1,338	238	18	13	0	269	159
7130	1,493	1,367	33	0	0	0	33	93
7131*	2,450	2,068	218	33	18	0	269	111
7132.01*	2,961	2,675	171	14	0	0	185	101
7132.02	854	807	12	6	23	6	47	0
7133	1,844	1,452	157	96	28	6	287	105
7134.01	2,311	2,065	177	26	0	0	203	43
7134.02	1,946	1,467	328	34	6	86	454	25
7135.01*	1,631	926	531	52	98	24	705	0
7135.02*	2,292	1,751	275	57	47	38	417	124
7139*	9	3	6	0	0	0	6	0
7140*	68	51	0	0	0	0	0	17
7143.02*	53	53	0	0	0	0	0	0
7144*	372	372	0	0	0	0	0	0
7146*	1,893	1,435	117	24	0	41	182	276
7147.01*	1,303	1,222	26	0	0	0	26	55
7147.02	961	910	14	0	0	0	14	37
7148.01	2,556	2,026	117	26	35	11	189	341
7148.02	1,229	792	31	3	0	0	34	403
7149.01	1,676	1,350	54	0	19	0	73	251
7149.02	1,485	1,216	106	4	2	27	139	130

**Data reflects only the portion of the census tract within the Urban County*

***The Urban County is Stark County exclusive of the Cities of Alliance, Canton, and Massillon*

Source: U.S. Census Bureau, Census 2000 (SF 3, H30)

Figure 6-17
Percent Multifamily Units by Census Tract, 2000



iii. Foreclosure Trends

HUD NSP estimates provide foreclosure data at the local level.[53] Between January 2007 and June 2008, the Urban County had an estimated 2,723 foreclosure filings, representing a foreclosure rate of 6.3%. Rates were highest in the tracts partially contained within one of the three cities covered in this AI, as detailed in Figure 6-18. Because HUD estimates provide data for the entire census tract, foreclosure rates for tracts partially contained within the Urban County may contain data on foreclosures that are located outside of its jurisdiction. Tracts 7002 and 7140, previously identified as areas of Black concentration, had foreclosure rates of 15.1% and 8.2%, both higher than the rate of 6.3% across the entire Urban County.

[53] HUD NSP Estimates data, covering the period between January 2007 and June 2008, is not an exact count, but distributes the results of a national survey across geographic areas according to a model considering rates of metropolitan area home value decline, unemployment and high-cost mortgages.

Figure 6-18
Estimated Residential Foreclosure Rates by Census Tract, January 2007 – June 2008

Census tract	Foreclosure Filings	Total Mortgages	Foreclosure Rate	Census tract	Foreclosure Filings	Total Mortgages	Foreclosure Rate
Urban County	**2,723**	**43,393**	**6.3%**	7121.01	74	1,685	4.4%
7002*	186	1,229	15.1%	7121.02	121	2,250	5.4%
7004*	111	1,067	10.4%	7122.01*	73	1,433	5.1%
7007*	100	1,276	7.8%	7122.02*	78	1,507	5.2%
7008*	118	908	13.0%	7123*	107	1,380	7.8%
7012*	126	940	13.4%	7124*	86	1,264	6.8%
7018*	42	218	19.3%	7125	47	574	8.2%
7021*	97	556	17.4%	7126.01	35	590	5.9%
7023*	15	81	18.5%	7126.02	69	1,088	6.3%
7025*	115	743	15.5%	7127	56	1,155	4.8%
7102*	93	676	13.8%	7128*	75	1,000	7.5%
7103*	85	741	11.5%	7129	60	720	8.3%
7106*	78	1,049	7.4%	7130	61	880	6.9%
7107*	45	579	7.8%	7131*	131	1,426	9.2%
7108*	94	1,121	8.4%	7132.01*	154	1,834	8.4%
7109	61	1,023	6.0%	7132.02	51	560	9.1%
7110	96	1,776	5.4%	7133	93	1,144	8.1%
7111.01	144	2,412	6.0%	7134.01	104	1,294	8.0%
7111.02	146	3,241	4.5%	7134.02	88	1,088	8.1%
7112.01	179	2,683	6.7%	7135.01*	63	1,007	6.3%
7112.02	68	1,072	6.3%	7135.02*	84	1,137	7.4%
7113.02	64	1,322	4.8%	7139*	52	410	12.7%
7113.11	81	1,991	4.1%	7140*	72	880	8.2%
7113.12	71	1,778	4.0%	7143.02*	72	894	8.1%
7114.01*	123	2,188	5.6%	7144*	61	901	6.8%
7114.02*	68	1,602	4.2%	7146*	62	887	7.0%
7115*	55	1,269	4.3%	7147.01*	103	1,472	7.0%
7116*	99	1,412	7.0%	7147.02	32	572	5.6%
7117*	92	1,262	7.3%	7148.01	105	1,276	8.2%
7118*	54	956	5.6%	7148.02	26	491	5.3%
7119	60	1,033	5.8%	7149.01	73	847	8.6%
7120	50	938	5.3%	7149.02	44	558	7.9%

**Starred census tracts are partially contained within the Urban County. Therefore, census tract totals may be greater than the County overall.*

Source: HUD NSP Foreclosure Estimates, realeased October 2008

In September 2010, RealtyTrac reported 534 new foreclosure filings in Stark County (including the cities of Alliance, Canton and Massillon), or one in every 328 housing units.

Foreclosure activity is related to fair housing to the extent that it is disproportionately dispersed, both geographically and among members of the protected classes. Concentrated foreclosures and residential vacancy threaten the viability of neighborhoods as well as the ability of families to maintain housing and build wealth. Households carrying heavy cost burdens are prime candidates for mortgage delinquency and foreclosure.

Observation

Between January 2007 and June 2008, the Urban County had a foreclosure rate of 6.3%. The two census tracts of Black concentration, 7002 and 7140, had foreclosure rates of 15.1% and 8.2%, respectively.

iv. Protected Class Status and Home Ownership

The value in home ownership lies in the accumulation of wealth as the owner's share of equity increases with the property's value. Paying a monthly mortgage instead of rent is an investment in an asset that is likely to appreciate. According to one study, "a family that puts 5 percent down to buy a house will earn a 100 percent return on the investment every time the house appreciates 5 percent."[54]

Historically, minorities tend to have lower home ownership rates than Whites. In 2000 in the Urban County, Whites had a home ownership rate of 79.1%. By comparison, Blacks owned their homes at a rate of 58% and Hispanics, 62.4%. Asians had a home ownership rate of 64.3%, which was higher than other minority populations but still less than Whites.

In tract 7002 previously identified as an area of Black concentration, home ownership rates were comparable among Black and White households at 75% and 75.2%, respectively. Data on Black households was insufficient to draw a conclusion for tract 7140, the Urban County's other area of Black concentration, though 100% of White households in this tract were homeowners.

[54] Kathleen C. Engel and Patricia A. McCoy, "From Credit Denial to Predatory Lending: The Challenge of Sustaining Minority Homeownership," in Segregation: The Rising Costs for America, edited by James H. Carr and Nandinee K. Kutty (New York: Routledge 2008) p. 82.

Figure 6-19
Home Ownership by Race and Ethnicity, 2000

Census Tract	White		Black		Asian		Hispanic	
	#	%	#	%	#	%	#	%
Urban County**	**72,181**	**79.1%**	**1,040**	**58.0%**	**339**	**64.3%**	**335**	**62.4%**
7002*	398	75.2%	72	75.0%	---	---	---	---
7004*	237	73.8%	9	52.9%	---	---	---	---
7007*	---	---	---	---	---	---	---	---
7008*	---	---	---	---	---	---	---	---
7012*	---	---	---	---	---	---	---	---
7018*	---	---	---	---	---	---	---	---
7021*	---	---	---	---	---	---	---	---
7023*	7	100.0%	---	---	---	---	---	---
7025*	---	#DIV/0!	---	---	---	---	---	---
7102*	240	81.6%	0	0.0%	---	---	0	0.0%
7103*	47	45.2%	---	---	---	---	---	---
7106*	204	87.6%	---	---	---	---	---	---
7107*	---	---	---	---	---	---	---	---
7108*	1,331	85.7%	72	73.5%	0	0.0%	17	100.0%
7109	1,274	89.2%	6	100.0%	13	100.0%	---	---
7110	1,992	74.3%	0	0.0%	13	100.0%	6	54.5%
7111.01	2,829	89.2%	2	40.0%	18	100.0%	---	---
7111.02	2,565	81.0%	34	73.9%	---	---	16	47.1%
7112.01	2,492	77.4%	0	0.0%	---	---	0	0.0%
7112.02	1,347	89.5%	7	100.0%	---	---	8	100.0%
7113.02	1,912	60.5%	8	11.6%	23	33.3%	16	42.1%
7113.11	2,158	88.2%	9	60.0%	0	0.0%	20	74.1%
7113.12	1,755	83.5%	29	80.6%	30	100.0%	6	100.0%
7114.01*	2,046	91.9%	0	0.0%	---	---	---	---
7114.02*	1,638	65.7%	16	19.5%	46	85.2%	13	44.8%
7115*	2,270	69.7%	26	40.6%	11	50.0%	26	61.9%
7116*	1,996	74.8%	18	33.3%	0	0.0%	16	47.1%
7117*	543	70.1%	0	0.0%	9	100.0%	---	---
7118*	1,293	71.0%	9	19.1%	9	36.0%	0	0.0%
7119	1,542	66.4%	8	38.1%	9	27.3%	8	40.0%
7120	1,308	75.2%	7	100.0%	---	---	10	100.0%
7121.01	2,037	64.0%	12	44.4%	30	50.8%	27	60.0%
7121.02	2,001	82.9%	39	45.9%	---	---	---	---
7122.01*	1,020	92.0%	6	100.0%	32	100.0%	7	100.0%
7122.02*	1,290	90.5%	26	61.9%	6	100.0%	13	100.0%
7123*	1,911	80.2%	53	48.6%	---	---	11	64.7%
7124*	1,395	83.3%	8	26.7%	9	100.0%	0	0.0%
7125	631	87.2%	---	---	---	---	---	---
7126.01	551	56.5%	0	0.0%	9	100.0%	0	0.0%
7126.02	1,492	76.7%	---	---	0	0.0%	6	100.0%
7127	1,357	79.3%	---	---	5	100.0%	7	100.0%

Figure 6-20
Home Ownership by Race and Ethnicity, 2000 (cont'd)

Census Tract	White		Black		Asian		Hispanic	
	#	%	#	%	#	%	#	%
7128*	1,341	87.9%	0	0.0%	12	100.0%	---	---
7129	1,248	77.2%	---	---	13	65.0%	---	---
7130	1,235	87.2%	25	100.0%	---	---	5	100.0%
7131*	1,771	81.4%	116	77.9%	---	---	15	100.0%
7132.01*	2,365	87.0%	129	100.0%	---	---	7	100.0%
7132.02	734	90.5%	19	76.0%	---	---	---	---
7133	1,327	79.7%	82	82.0%	---	---	9	60.0%
7134.01	1,877	85.6%	26	100.0%	---	---	23	100.0%
7134.02	1,326	73.1%	20	52.6%	7	100.0%	6	100.0%
7135.01*	822	56.3%	34	34.0%	---	---	---	---
7135.02*	1,676	78.4%	33	58.9%	---	---	13	65.0%
7139*	3	33.3%	---	---	---	---	---	---
7140*	68	100.0%	---	---	---	---	---	---
7143.02*	53	100.0%	---	---	---	---	---	---
7144*	315	93.2%	32	100.0%	---	---	---	---
7146*	1,492	83.9%	---	---	7	100.0%	0	0.0%
7147.01*	1,137	91.2%	---	---	10	100.0%	---	---
7147.02	826	89.7%	---	---	7	100.0%	---	---
7148.01	1,991	82.1%	---	---	---	---	7	100.0%
7148.02	1,028	88.1%	---	---	---	---	---	---
7149.01	1,403	89.0%	8	100.0%	11	100.0%	9	100.0%
7149.02	1,034	76.4%	40	74.1%	0	0.0%	8	57.1%

Note: Cells for tracts in which no member of a racial or ethnic group live are left blank to differentiate them from tracts in which the home ownership rate is 0%.

**Data in starred census tracts reflects only the parts of the tracts within the Urban County*

***The Urban County is Stark County exclusive of the Cities of Alliance, Canton, and Massillon*

Source: U.S. Census Bureau, Census 2000 (SF 3, H11, H12)

As discussed previously in this report, median household income is lower among Black and Hispanic households in the Urban County than among White households. This factor contributes to the low rates of home ownership among minorities in the City.

Observation

Lower household incomes among Blacks and Hispanics are reflected in lower home ownership rates when compared to Whites.

Among minorities, 58% of Blacks and 62.4% of Hispanics were home owners, compared to 79.1% of Whites.

v. The Tendency of the Protected Classes to Live in Larger Households

Larger families may be at risk for housing discrimination on the basis of race and the presence of children (familial status). A larger household, whether or not children are present, can raise fair housing concerns. If there are policies or programs that restrict the number of persons that can live together in a single housing unit, and members of the protected classes need more bedrooms to accommodate their larger household, there is a fair housing concern because the restriction on the size of the unit will have a negative impact on members of the protected classes.

In the Urban County, minorities were more likely than Whites to live in families with three or more people. In 2000, 54.6% of White families had three or more people. By comparison, over two thirds (69.4%) of families of persons of two or more races were considered large, as were 62.4% of Black families.

Figure 6-21
Families with Three or More Persons, 2000

Race	Percent of families with three or more persons
White	54.6%
Black	62.4%
Two or More Races	69.4%

Source: U.S. Census Bureau, Census 2000 (SF 4, PCT17)

To adequately house larger families, a sufficient supply of larger dwelling units consisting of three or more bedrooms is necessary. In the Urban County, there are fewer options to rent a unit to accommodate large families. Of 20,287 rental units in 2000, only 22.9% had three or more bedrooms, compared to 82.6% of the owner housing stock.

Figure 6-22
Housing Units by Number of Bedrooms, 2000

Size of Housing Units	Renter-Occupied Housing Stock		Owner-Occupied Housing Stock	
	Number of Units	Percent of Total Housing Units	Number of Units	Percent of Total Housing Units
0-1 bedroom	4,261	21.0%	813	1.1%
2 bedrooms	11,373	56.1%	12,031	16.3%
3 or more bedrooms	**4,653**	**22.9%**	**61,168**	**82.6%**
Total	20,287	100.0%	74,012	100.0%

Source: U.S. Census Bureau, Census 2000 (SF 3, H42)

Observation

Minority households were more likely to live in larger families than White households.

Among Black families, 62.4% had three or more persons compared to 54.6% of White families. However, only 22.9% of the rental housing stock contains three or more bedrooms compared to 82.6% of the owner housing stock.

vi. Cost of Housing

Increasing housing costs are not a direct form of housing discrimination. However, a lack of affordable housing does constrain housing choice. Residents may be limited to a smaller selection of neighborhoods because of a lack of affordable housing in those areas.

Between 1990 and 2008, median housing value (in inflation-adjusted dollars) increased 30.3% in Stark County, while real median income decreased 6.3%. Real median income increased 6.4% during the 1990s, then sharply decreased another 12.0% between 2000 and 2008. Median gross rent declined 1.3% between 1990 and 2008. The increase in median housing value paired with a fall of real income means that buying a house is relatively more expensive for individuals and families.

Figure 6-23
Trends in Housing Value, Rent and Income, 1990-2008

	1990	2000	2008	Change 1990-2008
Median Housing Value				
Actual Dollars	$57,400	$100,300	$129,900	126.3%
Median Housing Value (2008 $)	$99,664	$129,621	$129,900	30.3%
Median Gross Rent				
Actual Dollars	$356	$486	$610	71.3%
Median Gross Rent (2008 $)	$618	$628	$610	-1.3%
Median Household Income				
Actual Dollars	$27,852	$39,824	$45,306	62.7%
Median Household Income (2008 $)	$48,360	$51,466	$45,306	-6.3%

Note: Includes the Cities of Alliance, Canton and Massillon
Sources: U.S. Census Bureau, 1990 Census (STF3-H061A, H043A, P080A), Census 2000 (SF3-H76, H63, P53), 2006-2008 American Community Survey (B25077, B25064, B19013); Calculations by Mullin & Lonergan Associates, Inc.

a. Rental Housing

The number of affordable rental units in the Urban County declined between 2000 and 2008. The number of units renting for less than $500 fell by almost half (47.6%). During the same time, the number of units renting for more than $1,000 per month increased from 659 to 2,043, or 210%.

Figure 6-24
Loss of Affordable Rental Housing Units, 2000-2008

Units Renting for:	2000	2008	Change 2000-2008 #	Change 2000-2008 %
Less than $500	7,453	3,902	-3,551	-47.6%
$500 to $699	8,021	7,710	-311	-3.9%
$700 to $999	2,682	7,293	4,611	171.9%
$1,000 or more	659	2,043	1,384	210.0%

Excludes the Cities of Alliance, Canton, and Massillon

Sources: U.S. Census Bureau, Census 2000 (SF3, H62), 2006-2008 American Community Survey (B25063)

Observation

The Urban County lost almost half of its units renting for less than $500 between 2000 and 2008.

By comparison, units renting for more than $1,000 tripled from 659 to 2,043 units.

The National Low Income Housing Coalition provides annual information on the Fair Market Rent (FMR) and affordability of rental housing in counties and cities in the U.S. for 2010. In Stark County, the FMR for a two-bedroom apartment is $644. In order to afford this level of rent and utilities, without paying more than 30% of income on housing, a household must earn $2,147 monthly or $25,760 annually. Assuming a 40-hour work week, 52 weeks per year, this level of income translates into a Housing Wage of $12.38.

In Stark County, a minimum-wage worker earns an hourly wage of $7.30. In order to afford the FMR for a two-bedroom apartment, a minimum-wage earner must work 68 hours per week, 52 weeks per year. Or, a household must include 1.7 minimum-wage earners working 40 hours per week year-round in order to make the two-bedroom FMR affordable.

In Stark County, the estimated average wage for a renter is $10.46 an hour. In order to afford the FMR for a two-bedroom apartment at this wage, a renter must work 47 hours per week, 52 weeks per year. Or, working 40 hours per week year-round, a household must include 1.2 workers earning the average renter wage in order to make the two-bedroom FMR affordable.

Observation

Minimum-wage and single-income households cannot afford a housing unit renting for the HUD fair market rent in Stark County.

This situation forces these individuals and households to double-up with others, or lease inexpensive, potentially substandard units from unscrupulous lenders. Minorities and female-headed households will be disproportionately impacted because of their lower incomes.

Monthly Supplemental Security Income (SSI) payments for an individual are $674 in Stark County and across Ohio. If SSI represents an individual's sole source of income, $202 in monthly rent is affordable, while the FMR for a one-bedroom is $510.

Observation

Persons with disabilities receiving a monthly SSI check for $674 as their sole source of income cannot afford a one-bedroom unit renting at the fair market rate of $510 in Stark County.

b. Sales Housing

One method used to determine the inherent affordability of a housing market is to calculate the percentage of homes that could be purchased by households at the median income level. It is possible also to determine the affordability of the housing market for each racial or ethnic group in the City. To determine affordability (i.e., how much mortgage a household could afford), the following assumptions were made:

- The mortgage was a 30-year fixed rate loan at a 5.0% interest rate,
- The buyer made a 10% down payment on the sales price,
- Principal, interest, taxes and insurance (PITI) equaled no more than 30% of gross monthly income,
- Property taxes were assessed at the Urban County's median tax rate of 1.565% of the market price, and
- There was no additional consumer debt (credit cards, etc).

Figure 6-24 details the estimated *maximum* affordable sales prices and monthly PITI payments for Whites, Blacks and Hispanics in Stark County (income estimates were not available for the Urban County exclusive of the Cities of Alliance, Canton, and Massillon). The maximum affordable home purchase price for Hispanics and Whites was well above the average sales price of $100,901 in 2009. Prospective Black homebuyers, on the other hand, had more limited options. The maximum affordable purchase price at the median household income for Blacks was $20,000 less than the median sales price, and less than half of the maximum affordable purchase price for the County overall.

Figure 6-25
Maximum Affordable Purchase Price by Race/Ethnicity, 2009

	Median Household Income	Monthly Mortgage Payment				Maximum Affordable Purchase Price
		Mortgage Principal & Interest	Real Estate Taxes	Homeowner's Insurance & PMI	Total PITI Payment	
Stark County	**$45,306**	**$829**	**$224**	**$80**	**$1,133**	**$171,600**
Whites	$47,714	$876	$237	$80	$1,193	$181,400
Blacks	$22,686	$383	$104	$80	$567	$79,400
Hispanics	$33,750	$602	$162	$80	$844	$124,500
2009 Stark County Average Sales Price: $100,901						

Sources: 2006-2008 American Community Survey (B19013, B19013A, B19013B); Stark County Association of Realtors; Stark County Auditor's Office; Calculations by Mullin & Lonergan Associates, Inc.

vii. Protected Class Status and Housing Problems

Lower-income minority households tend to experience housing problems at a higher rate than lower-income White households.[55] Among lower-income renter households in the Urban County, Blacks experienced housing problems at the highest rates, while Hispanic households had the lowest rates. Among White renter households, 51.4% had a housing problem in 2000, compared to 63.1% of Black households and 33.3% of Hispanic households. Elderly households had the highest rates of housing problems among renters.

Among owner households earning less than 80% MFI in the Urban County, Blacks and Whites had similar levels of housing problems, at 38.0% and 38.1%, respectively. Hispanic owner households experienced higher rates of housing problems, at 44.3%. All other households had the highest levels of housing problems, especially among Black and Hispanic households.

[55] HUD defines housing problems as (1) cost burden of 30% or more (i.e. paying more than 30% of gross income on monthly housing expenses), and/or (2) lacking complete kitchen or plumbing facilities, and/or (3) overcrowding of more than 1.01 persons per room.

Figure 6-26
Lower-income Households with Housing Problems, 2000

	Total Households 0-80% of MFI		Elderly & 1-2 Person Households 0-80% of MFI		Family Households 0-80% of MFI		All Other Households 0-80% of MFI	
	Total	% with a Housing Problem	Total	%	Total	%	Total	%
Renters								
White Non-Hispanic	9,585	51.4%	2,880	62.8%	3,598	47.2%	3,107	45.7%
Black Non-Hispanic	379	63.1%	24	83.3%	246	67.5%	109	48.6%
Hispanic	78	33.3%	16	50.0%	50	28.0%	12	33.3%
Total	**10,396**	**51.5%**	**2,977**	**62.4%**	**4,069**	**48.0%**	**3,350**	**46.0%**
Owners								
White Non-Hispanic	18,127	38.1%	10,000	26.5%	5,946	51.2%	2,181	55.5%
Black Non-Hispanic	271	38.0%	167	25.2%	65	49.2%	39	74.4%
Hispanic	122	44.3%	42	33.3%	66	45.4%	14	71.4%
Total	**18,727**	**38.3%**	**10,246**	**26.4%**	**6,210**	**51.5%**	**2,271**	**55.6%**

Source: HUD Comprehensive Housing Affordability Strategy data

Observation

Lower-income Black renters experienced housing problems at greater rates than White and Hispanic renters.

Among renter households, 63.1% of Blacks had housing problems, compared to 51.4% of Whites and 33.3% of Hispanics.

C. Review of Public Sector Policies

The analysis of impediments is a review of impediments to fair housing choice in the public and private sector. Impediments to fair housing choice are any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status or national origin that restrict housing choices or the availability of housing choices, or any actions, omissions or decisions that have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex, disability, familial status or national origin. Policies, practices or procedures that appear neutral on their face but which operate to deny or adversely affect the provision of housing to persons of a particular race, color, religion, sex, disability, familial status, or national origin may constitute such impediments.

An important element of the AI includes an examination of public policy in terms of its impact on housing choice. This section evaluates the public policies in the Urban County to determine opportunities for furthering the expansion of fair housing choice.

i. Policies Governing Investment of Federal Entitlement Funds

From a budgetary standpoint, housing choice can be affected by the allocation of staff and financial resources to housing related programs and initiatives. The decline in federal funding opportunities for affordable housing for lower income households has shifted much of the challenge of affordable housing production to state, county and local government decision makers.

The recent Westchester County, NY, fair housing settlement also reinforces the importance of expanding housing choice in non-impacted areas (i.e. areas outside of concentrations of minority and LMI persons). Westchester County violated its cooperation agreements with local units of government which prohibit the expenditure of CDBG funds for activities in communities that do not affirmatively further fair housing within their jurisdiction or otherwise impede the County's action to comply with its fair housing certifications.

Stark County's federal entitlement funds received from HUD can be used for a variety of activities to serve a variety of aims, as follows:

- Community Development Block Grant (CDBG): The primary objective of this program is to develop viable urban communities by providing decent housing, a suitable living environment, and economic opportunities, principally for persons of low and moderate income levels. Funds can be used for a wide array of activities, including: housing rehabilitation, homeownership assistance, lead-based paint detection and removal, construction or rehabilitation of public facilities and infrastructure, removal of architectural barriers, public services, rehabilitation of commercial or industrial buildings, and loans or grants to businesses.

- HOME Investment Partnerships Program (HOME): The HOME program provides federal funds for the development and rehabilitation of affordable rental and ownership housing for low and moderate income households. HOME funds can be used for activities that promote affordable rental housing and homeownership by low and moderate income households, including reconstruction, moderate or substantial rehabilitation, homebuyer assistance, and tenant-based rental assistance.

In addition, Stark County has received funding from the Neighborhood Stabilization Program (NSP), which was established for the purpose of stabilizing communities that have suffered from foreclosures and abandonment. Through the purchase and redevelopment of foreclosed and abandoned homes and residential properties, the goal of the program is being realized. NSP1, a term that references the NSP funds authorized under Division B, Title III of the Housing and Economic Recovery Act (HERA) of 2008, provides grants to all states and selected local governments on a formula basis.

The system of entitlement fund administration in Stark County varies by funding source. The cities of Alliance, Canton and Massillon are each CDBG entitlements and directly receive, manage and account for funds received through that program. Urban Stark County, as an entitlement jurisdiction, manages CDBG funds for areas of the County outside those three cities. In the HOME program, Canton is its own participating jurisdiction, while Alliance and Canton receive funding through the Stark County HOME Consortium. Canton and Stark County are direct federal NSP recipients, while Massillon administers an NSP program with competitive funding through the State of Ohio. None of these programs are administered in the Village of Hills and Dales, which has elected to opt out of the programs.

The Board of Stark County Commissioners is responsible for federal entitlement programs administered by the County. The Board has contracted with the Stark County Regional Planning Commission (SCRPC) to handle planning and administration related to these programs. SCRPC compiles the Five-Year Consolidated Plan, which establishes policies and priorities to govern entitlement spending. The Stark County Consortium Consolidated Plan was originally prepared and approved in 1995 and has been updated for FY 2009 – 2013.

Stark County allocates CDBG and HOME funds on a competitive basis. However, the cities of Alliance and Massillon determine the HOME programs and projects to be undertaken within their jurisdictional boundaries. Each of the cities receives funding according to a percentage of total HOME funds available to the Consortium. For Alliance, this is 20.25%, and for Massillon, this is 18.35%. SCRPC's Community Development Department reviews all HOME applications for eligibility and makes recommendations to the Board of Stark County Commissioners relative to allocation decisions outside of the cities. The County's CDBG program runs on a three-year funding cycle, while applications for HOME funding are accepted annually.

Major housing priorities for FY 2009 – 2013, as described in the Consolidated Plan, include:

- Improving the quality of existing owner stock through various rehabilitation programs serving eligible households, through The Stock Pile, a warehouse that provides LMI households with discounted building materials, and through fair housing activities, and
- Increasing the availability and accessibility of owner housing through homebuyer assistance programs

Each year's CDBG budget in the current three-year cycle includes an allocation of $54,615 for administration, which covers salary and benefits along with SCRPC's fair housing program. The program provides fair housing services to the residents of the Urban County, in addition to providing assistance to the City of Alliance under contract. These services include landlord/tenant counseling, housing discrimination investigation and mitigation and fair housing counseling.

Observation

Stark County allocated a fraction of $54,615 in CDBG administrative funds in recent years to fair housing activities. Generally speaking, an entitlement should budget 1%-3% of its annual CDBG grant for fair housing undertakings.

Applications for the HOME program are evaluated according to standards set in the SCRPC HOME Policy and Compliance Manual, which is distributed to potential funding subrecipients. SCRPC uses a "building block" approach in the distribution of limited funds, considering the mix of ongoing projects, competing projects and complementary projects for all known housing, commercial and infrastructure investments. This approach assists SCRPC in planning Stark County as a unified community. SCRPC weighs each proposed project using project threshold criteria explained in the manual. Among common inclusions, such as site control, consistency with the Consolidated Plan goals and timeline, SCRPC requires community support for proposals: "Project should provide evidence of outreach, involvement and cooperative intent with residents or organizations representative of the residents within the target neighborhood(s). Evidence of support must be project-specific and current."

Observation

SCRPC's requirement that proposed HOME projects gain evidence of support from residents within the project's targeted neighborhood makes proposed affordable housing projects susceptible to defeat by not-in-my-backyard (NIMBY) attitudes.

Gaining the required support for an affordable multifamily rental project in many non-impacted areas, for example, could be difficult under the current guidelines. Furthermore, if a comparable market-rate multi-family development were not required to secure the same level of community support, this type of action could be viewed as discriminating against lower-income minority households.

ii. Affirmative Marketing Policy

As a recipient of CDBG and HOME funds, the County is required to adopt affirmative procedures and requirements for all CDBG- and HOME-assisted housing with five or more units. Such a plan should include:

- Methods of informing the public, owners, and potential tenants about fair housing laws and the Urban County's policies
- A description of what the owners and/or the Urban County will do to affirmatively market housing assisted with CDBG or HOME funds
- A description of what the owners and/or the Urban County will do to inform persons not likely to apply for housing without special outreach
- Maintenance of records to document actions taken to affirmatively market CDBG- and HOME-assisted units and to assess marketing effectiveness, and
- A description of how efforts will be assessed and what corrective actions will be taken where requirements are not met.

The County's HOME Policy Manual states that applicants are responsible for familiarizing themselves with applicable laws, particularly Section 504 of the Rehabilitation Act of 1973 and the Fair Housing Act of 1988. In the policies relating specifically to rental projects, the County states that owners of the rental housing must adhere to equal opportunity, affirmative marketing and fair housing practices in all marketing efforts, eligibility determinations and other transactions. Owners must solicit applications from persons in the housing market not likely to apply without special outreach efforts. All marketing efforts must be documented. Similar requirements exist for NSP projects.

The County's affirmative marketing policy could be improved by incorporating more specific requirements for how units will be marketed to traditionally underserved populations, such as racial/ethnic minorities and persons with limited English proficiency. While the manual refers to fair housing practices, it does not state what those practices are or how owners should comply. The County should require that an owner, developer or sponsor continue outreach activities as long as or whenever units are available, with affirmative marketing to commence at least 30 days prior to general marketing. Finally, the County should specify how it will monitor affirmative marketing efforts and state the consequences for noncompliance, which could include a report to HUD or a ban on future participation in County programs.

Observation

SCRPC should amend its HOME Policy and Compliance Manual to expand upon its affirmative marketing requirements, more specifically stating what actions are required on the part of owners, developers or sponsors and what corrective actions will be taken in the event of noncompliance.

iii. Site and Neighborhood Selection Policy

Recipients of HOME funds are required to administer their program in compliance with the regulations found at 24 CFR 983.6(b), known as the Site and Neighborhood Standards. These standards address the site location requirements for newly constructed rental units financed with HOME funds.

Site selection for HOME-assisted construction of new rental units must comply with several standards, including among other things, promoting greater choice of housing opportunities and avoiding undue concentration of assisted persons in areas containing a high concentration of LMI persons. With few exceptions, site selection must include a location that is not in an area of minority concentration.

Stark County's HOME Policy and Compliance Manual stipulates that funding recipients who develop new construction rental projects must ensure that the project conforms to the standards at 24 CFR 983.6(b). Implicit in the manual is the suggestion that compliance with HUD site and neighborhood standards will be reviewed by the County, though site selection is not among the project threshold criteria the County considers in its evaluation of proposals.

In the application for HOME funds, the County provides more specific guidance on site selection standards as they apply to new construction rental projects. Applicants are required to provide narrative to describe each of the following as they relate to proposed projects:

- Adequacy of the site
- Extent to which the project and location further compliance with fair housing laws. Specifically, that the site is not located in an area of minority concentration or racially mixed area, but if it is in a minority concentration area, that the project will not significantly increase the proportion of minorities; or that sufficient comparable opportunities exist outside of the area for minorities based on an analysis of HUD-assisted housing, or that the project is necessary to meet overriding housing need that cannot

otherwise be met integral to preservation strategy or integral to revitalization area strategy

- Extent to which the project promotes a greater choice of housing opportunities and avoids the undue concentration of assisted persons
- That the neighborhood of the proposed site is not seriously detrimental to family life
- That the neighborhood of the proposed site is comparably accessible to broad range of services and facilities
- That travel and access to jobs is not excessive from the proposed site

Beyond requiring that applicants address these items, the application does not state if and how responses to site and neighborhood selection questions will affect the outcome of the proposal.

Observation

SCRPC should amend the HOME Policy and Compliance Manual to include a written policy that encompasses the requirements at 24 CFR 983.6 and that can be more formally incorporated as part of the application review and approval process for all applicable HOME-assisted projects.

All housing providers, builders and developers should receive a copy of this policy as part of the HOME application package. HUD's site and neighborhood standards should also be incorporated into the County's written agreements with developers, subrecipients and CHDOs. Such a policy will facilitate the County's goals toward affirmatively furthering fair housing.

iv. Appointed Boards and Commissions

A community's sensitivity to fair housing issues is often determined by people in positions of public leadership. The perception of housing needs and the intensity of a community's commitment to housing related goals and objectives are often measured by board members, directorships, and the extent to which these individuals relate within an organized framework of agencies, groups, and individuals involved in housing matters. The expansion of fair housing choice requires a team effort and public leadership and commitment is a prerequisite to strategic action.

a. Stark County Regional Planning Commission

The Stark County Regional Planning Commission (SCRPC) is a regional body comprised of staff persons and elected officials from communities throughout Stark County. SCRPC oversees the Urban County's CDBG and HOME programs. Additionally, SCRPC coordinates the long-term planning in the county, including developing its Comprehensive and Transportation Plans.

v. Language Access Plan for Persons with Limited English Proficiency

As noted in an earlier section of this report, the number of LEP Spanish speakers across Stark County exceeds 1,000. However, given limitations in ACS data, it is not clear how many persons with LEP are in the Urban County versus one of the three cities covered in this AI.

The County should review the Census 2010 data, when it becomes available, to determine how many persons with LEP are served by County programs and if any other language group exceeds 1,000 persons with LEP. If so, the County should perform a four-factor analysis to determine the extent to which the translation of vital documents is warranted.[56] (The term "vital document" refers generally to any publication that is needed to gain access to the benefits of a program or service.) Although there is no requirement to develop a Language Access Plan (LAP) for persons with LEP, HUD entitlement communities are responsible for serving LEP persons in accordance with Title VI of the Civil Rights Act of 1964. Preparation of a Language Access Plan (LAP) is the most effective way to achieve compliance.

Currently, to broaden public participation in the CDBG and HOME programs, SCRPC publishes notices of all public meetings in the *Canton Repository*, *Alliance Review* and *Massillon Independent*. Notices are also sent to all political jurisdictions within the CDBG and HOME program areas, as well as the non-profit corporations having applied for funding in the past. Public announcements are made at the monthly Housing Task Force meetings to make others aware of the process and solicit their involvement. Notices are also published on the SCRPC web site. SCRPC makes meetings and hearings as accessible and understandable as practicable. This is by reviewing meeting locations for ADA accessibility; reviewing meeting locations and times for proximity to SARTA routes and operating times; publicizing meeting notices by various methods, including posting informational flyers, mailing meeting notices, agendas and press releases, and placing paid advertisements in local newspapers.

Observation

Upon the release of detailed 2010 ACS data, the Stark County Regional Planning Commission should review the prevalence of persons with limited English proficiency and consider conducting a regional four-factor analysis to determine whether a Language Access Plan is warranted.

As of 2009 estimates, more than 4,100 people across the County, including Alliance, Canton and Massillon, spoke English less than "very well." This population may need assistance accessing local government programs and services.

vi. Comprehensive Planning

A community's comprehensive plan is a statement of policies relative to new development and preservation of existing assets. In particular, the land use element of the comprehensive plan defines the location, type and character of future development. The housing element of the comprehensive plan expresses the

[56] The four-factor analysis is detailed in the *Federal Register* dated January 22, 2007.

preferred density and intensity of residential neighborhoods within the County. Taken together, the land use and housing elements of the comprehensive plan define a vision of the type of community that Stark County wishes to become.

The 2020 Land Use Plan is the latest guide for development across Stark County's cities, villages and townships, covering the location of major transportation systems, public utilities, open space and recreation along with its employment, living and rural resource areas. SCRPC authored the plan in the early 1990s and reviews it biennially. This edition updates the first plan, produced in 1965, revised in 1980 and further amended in 1986. As prescribed by Ohio law, this regional plan is an advisory document to be used by local governments in preparing their own, more detailed local plans in accordance with their own goals and land use policies. It does not pre-empt the authorities of municipalities or townships in Stark County, but exists to expand and strengthen their capacities to make informed decisions.

The land use plan contains three major goals, along with strategies to be applied to each:

1. To strengthen the region's **economic growth** by preserving areas of existing and potential economic growth and providing for the community services essential to achieving that growth

   Strategies:

   - Identify and protect land suitable for economic investment support activities (commercial, industrial, warehousing, etc) through municipal and township zoning
   - Promote the concurrence of adequate water and sewer infrastructure to serve industrial land
   - Assure adequate capacity of infrastructure for all modes of transportation
   - Identify and protect natural resources
   - Promote adequate levels of police, fire, health, safety and other local government services
   - Encourage the location of more employment opportunities at well-designed office and industrial sites in proximity to suburban workforce participants
   - Expand commuter rail, public transit and interurban highway networks

2. To provide a more balanced **living environment** that promotes greater diversity in housing choices, job opportunities and leisure activities and increase the local tax base needed to provide essential public improvements

   Strategies:

   - Protect and enhance existing residential property investments and local neighborhood character through local zoning
   - Increase the range of housing choice in size, price range and related residential needs (rental units, affordability, assisted living features) through zoning, subdivision regulations and fair housing

- Provide adequate water and sewer infrastructure to all residential neighborhoods
- Encourage innovative residential design to preserve unique natural features and discourage the use of local streets by through traffic
- Provide adequate open space and recreational facilities
- Promote adequate levels of police, fire, health, safety and other local government services
- Encourage greater variety in job opportunities in reasonable proximity to residential neighborhoods to reduce traffic volume and congestion on residential streets

3. To enhance **environmental quality**, a goal critical in both improving community livability and attracting business investment and jobs

   Strategies:

   - Maintenance of air and water quality standards
   - Identify and preserve unique and productive farm lands
   - Identify flood plains and wetlands to be kept in open, unused space
   - Encourage the development of adequate landfill space and solid waste/recycling disposal programs
   - Encourage mined land reclamation and alternative land uses
   - Promote historical and architectural preservation
   - Encourage tree planting and urban design programs to improve community livability

The second goal, with its stated strategies to expand fair housing choice in a variety of respects, demonstrates the County's commitment to affirmatively further fair housing. Other components of the land use plan affect fair housing, including the planned location of new employment opportunities, housing development and infrastructure construction and/or improvements.

In its discussion of employment areas, the plan notes that the dispersion of jobs into suburban locations will present problems, as "more balanced jobs-housing patterns will create a need for more affordable housing in many suburban neighborhoods and concerns about property values." The plan does not recommend avoiding this arrangement, but instead calls for "sensitive and innovative urban design solutions" that can mitigate the perceived or real adverse impacts of new employment centers.

The living areas section of the plan states that more than 50% of urbanized Stark County is occupied by housing and its associated amenities. The County offers a wide array of neighborhoods varying in the age, type, affordability and condition of stock, the availability of rental units and community amenities. Older urban and suburban areas combine single-family homes on relatively small lots with multi-family apartments and special needs housing. Residential density is highest in the three cities covered in the AI: Canton has 7.44 housing units per acre; Massillon has 5.56 and Alliance has 4.74, compared to 2.16 in the balance of the County. In the rural townships dominated by farmland, the average density is one housing unit per acre. In the urban centers, rental units comprise more than 40% of all housing stock, while rentals are far less common in rural townships, accounting for 10% to 15% of the total housing units.

The goal of the regional land use plan as it relates specifically to housing is to encourage more diverse, livable communities that provide housing opportunities to all residents. For older urban and suburban areas, the plan recommends options that have the effect of expanding housing choice, including (but not limited to) flexible zoning to encourage infill housing and mixed uses, expanded public transit to extend job access and the adaptive reuse of buildings. Developing suburban areas have a different set of strategies, many of which also advance housing choice. These include more diversity in housing types for elderly and small families, more affordable housing with reduced parking and yard requirements, public transit connections to suburban job locations and infrastructure concurrence with housing development. “Transitional living areas,” consisting of urban fringe or exurban spaces, are given a separate set of strategies that prioritize minimizing urban development pressures and retaining land in very-low-density residential uses.

An additional component of the plan that is relevant to housing choice is the recommendation that local communities use land use controls to “build neighborhoods and communities instead of housing allotments.” The regional plan argues that the strict separation of land uses is a major contributor to sprawl, traffic congestion, the costly provision of services and the erosion of community cohesion. The plan recommends revisions that would build in more flexibility in subdivision design, zoning codes and building standards.

Observation

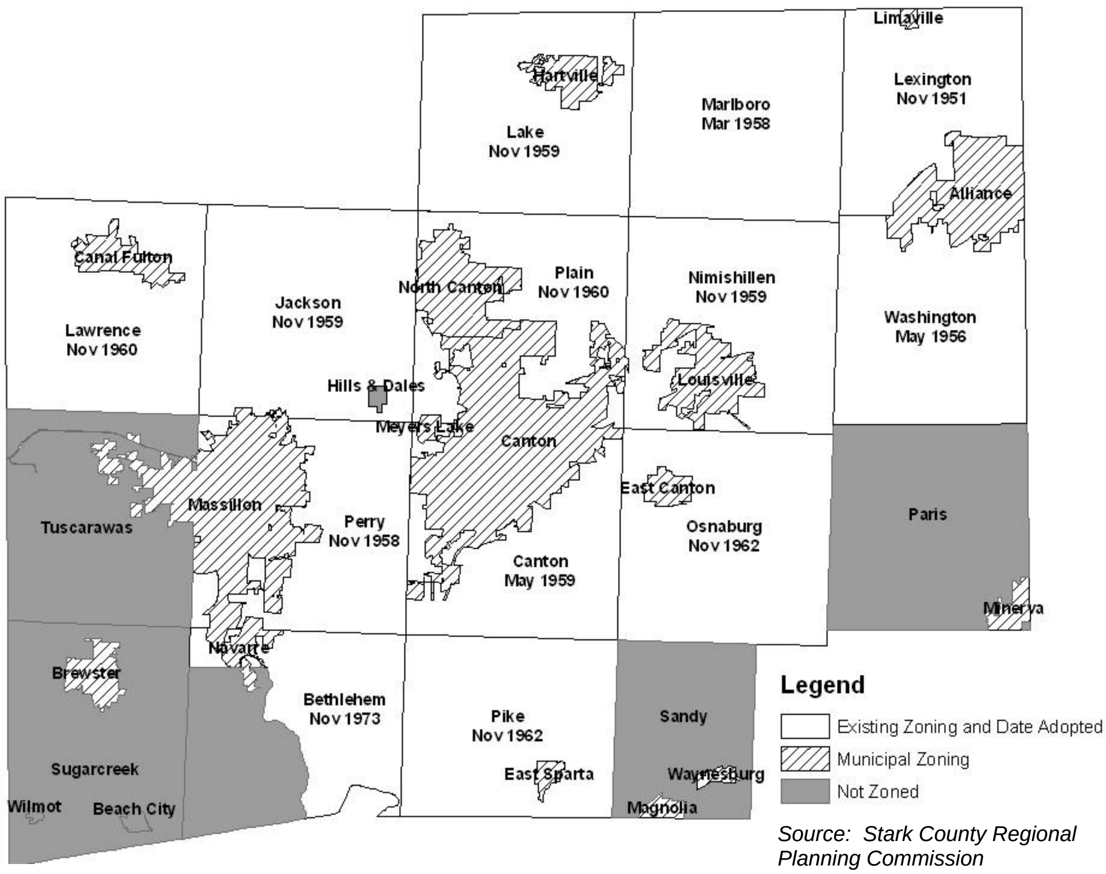
Stark County’s latest comprehensive plan, the 2020 Land Use Plan, demonstrates the County’s commitment to affirmatively furthering fair housing choice through a clear statement of intent supported by a set of policies designed to create a wider array of housing options in all areas of the County that are appropriate for residential development.

vii. Zoning

In Ohio, the power behind land development decisions resides with municipal governments through the formulation and administration of local controls. These include comprehensive plans, zoning ordinances and subdivision ordinances, as well as building and occupancy permits.

Stark County does not have a countywide zoning ordinance. Within the County, all six cities, eight of eleven villages and 12.5 of 17 unincorporated townships have adopted zoning regulations. The following map illustrates the extent and coverage area of existing zoning, as well as the year zoning was adopted in each township.

Figure 6-27
Zoning Coverage across Stark County, 2006



Source: Stark County Regional Planning Commission

Ordinances for Alliance, Canton and Massillon are reviewed elsewhere in the AI. For the Urban County, a sample of additional ordinances was selected for review to represent a cross-section of municipalities. Urban, suburban and rural municipalities were chosen, as well as municipalities located within the reach of public transportation service. Zoning ordinances were reviewed for the following jurisdictions within the Urban County:

- The City of North Canton
- The City of Louisville
- Jackson Township
- Osnaburg Township
- The Village of Brewster
- The Village of Minerva

Detailed zoning tables for each of these communities appears in Appendix B.

This analysis is based on the following five topics raised in HUD's Fair Housing Planning Guide, which include:

- The opportunity to develop various housing types, including apartments and housing at various densities
- The opportunity to develop alternative designs, such as cluster developments, planned residential developments, inclusionary zoning and transit-oriented developments
- Minimum lot size requirements
- Dispersal requirements and regulatory provisions for housing facilities for persons with disabilities (i.e. group homes) in single-family zoning districts
- Restrictions on the number of unrelated persons in dwelling units

a. Date of Ordinance

Generally speaking, the older a zoning ordinance, the less effective it will be. Older zoning ordinances have not evolved to address changing land uses, lifestyles and demographics. However, the age of the zoning ordinance does not necessarily mean that the regulations impede housing choice by members of the protected classes.

The ordinances reviewed for this analysis ranged in publication date from 1961 to 2009. While the regulations for unincorporated townships across Stark County are often decades old, this analysis found that they were amended to be generally as current as the municipal ordinances. Osnaburg's ordinance dates to 1961, but the ordinance was revised and the zoning map redrawn in 2008. The oldest ordinance reviewed for the AI was for the Village of Brewster, which has made only minor amendments since 1974. However, Brewster's rules and definitions are consistent with fair housing standards and the language in the ordinance is modern.

b. Residential Zoning Districts and Permitted Dwelling Types

The number of residential zoning districts is not as significant as the characteristics of each district, including permitted land uses, minimum lot sizes, and the range of permitted housing types. However, the number of residential zoning districts is indicative of the municipality's desire to promote and provide a diverse housing stock for different types of households at a wide range of income levels.

Similar to excessively large lots, restrictive forms of land use that exclude any particular form of housing, particularly multi-family housing, discourage the development of affordable housing. Allowing varied residential types reduces potential impediments to housing choice by members of the protected classes.

Ordinances for the cities, villages and townships reviewed all provided four to seven residential zoning categories, distinguishing between large-lot rural single-family areas, more standard single-family detached zones, more dense zones allowing single-family and two-family homes, and more urban multi-family zones where apartments are permitted by right.

As unincorporated townships with large expanses of undeveloped land, Jackson and Osnaburg use zoning primarily to preserve rural space. Across the vast majority of both areas, single-family homes are the only permitted residential use. Both townships offer categories for lower- and higher-density multifamily dwellings, but the amount of land devoted to these uses is minimal in comparison.

The development of multi-family housing is better accommodated by ordinances in the cities of Louisville and North Canton. In Louisville, residential zones include land available for development in both low-density and medium-density areas, providing opportunity for the creation of affordable housing. Notably, the city has no high-density area, as the densest arrangement of multifamily units permitted is eight dwelling units per acre. By comparison, North Canton has two multi-family zones that allow up to 12 and 24 dwelling units per acre. However, two-family and multi-family zones in North Canton are far more limited and isolated spatially, and there is a minimal amount of available land zoned for multi-family housing.

Along with single-family and multifamily categories, both villages maintain a zoning category for mobile home parks. Of the other jurisdictions, only Osnaburg Township had a similar category.

Observation

Although all of the zoning ordinances reviewed in the Urban County were noted to permit housing types that might be affordable, the amount of land zoned and available for the development of multi-family housing was minimal.

c. Permitted Residential Lot Sizes

Because members of the protected classes are often also in low-income households, a lack of affordable housing may impede housing choice by members of the protected classes. Excessively large lot sizes may deter development of affordable housing. A balance should be struck between areas with larger lots and those for smaller lots that will more easily support creation of affordable housing. Finally, the cost of land is an important factor in assessing affordable housing opportunities. Although small lot sizes of 10,000 square feet or less may be permitted, if the cost to acquire such a lot is prohibitively expensive, then new affordable housing opportunities may be severely limited, if not non-existent.

The vast majority of land in the unincorporated townships, Jackson and Osnaburg, is rural or agricultural, preserved by zoning with minimum lot sizes between 20,000 and 45,560 square feet. In Jackson, substantial undeveloped areas are designated as rural residential in future land use plans, a category that specifies minimum lot sizes of 20,000 square feet. Such large minimum lot sizes discourage the development of many affordable housing options. Both townships provide higher-density categories with lower minimum lot sizes and allowances for a variety of dwelling types (two-family, multi-family), but these areas are limited, especially in Osnaburg.

Among the cities reviewed, Louisville and North Canton, single-family residential zones are comparatively more dense than in the townships. The largest minimum lot size in a residential area across both cities is the R-1 requirement of 12,000 square feet in Louisville. Neither city preserves expansive rural areas.

Ordinances for the two villages reviewed, Brewster and Minerva, offered a variety of minimum lot sizes that presents no potential impediment to the development of affordable housing.

Observation

In the unincorporated townships reviewed, the majority of land is reserved for single-family housing with minimum lot sizes of 20,000 square feet or more. These areas are prohibitive of the development of smaller, more affordable residential communities.

d. Alternative Design

Allowing alternative designs provides opportunities for affordable housing by reducing the cost of infrastructure spread out over a larger parcel of land. Alternative designs may also increase the economies of scale in site development, further supporting the development of lower cost housing. Alternative designs can promote other community development objectives, including agricultural preservation or protection of environmentally sensitive lands, while off-setting large lot zoning and supporting the development of varied residential types. However, in many communities, alternative design developments often include higher-priced homes. Consideration should be given to alternative design developments that seek to produce and preserve affordable housing options for working and lower income households.

North Canton's mixed-use overlay district exists to encourage a "town center" area, which could theoretically provide affordable housing options by facilitating the development of a variety of dwelling types in dense areas well served by transit and other amenities.

With that possible exception, the zoning ordinances reviewed did not include alternatives with the intent or effect of expanding affordable housing options. Four of six ordinances contained a provision for planned unit development through overlay districts. These districts exist to promote a more efficient use of space and preservation of open space through providing flexibility in design standards and density. In the absence of affordable housing set-asides within these arrangements, however, the districts will likely include primarily low-density, non-affordable homes.

One of the most useful and successful tools for creating affordable housing opportunities is inclusionary zoning. Simply, inclusionary zoning involves a specified number or percentage of new housing units in a development that is set-aside for moderately priced homes. Inclusionary zoning is a "carrot and stick" approach to expanding affordable housing.

An inclusionary ordinance could provide financial and other incentives to developers in exchange for the provision of a percentage of housing units to be set-aside for households with incomes at or below 80% of the area median income. For an inclusionary ordinance to be effective, there must be specific incentives offered in exchange for specific measures to be undertaken by a developer. For example, the ordinance might require a developer to set-aside at least 5% of all single family housing units in a project to be sold for no more than $135,000 each. For a multi-family development plan, a specified percentage of the units (usually 5% to 10%) would be required to be set-aside for households under a specified income threshold.

In exchange for providing the required set-asides, a developer would be awarded one or more of the following incentives:

- Impact fee waivers or reductions
- Planning fee waivers or reductions
- Streamlining and priority processing
- Density bonuses, and/or
- Local funding to assist with the construction of the housing units made affordable to households at or below 80% of the area median income.

A key component to a successful inclusionary ordinance is the ability to make the affordable housing units indistinguishable from the market rate units. A casual observer should not be able to discern any exterior difference between a market rate unit and an affordable rate unit from the street. A certain degree of cost savings may be achieved on less luxurious interior finishes (e.g., laminate instead of marble countertops, linoleum instead of stone tile or hardwood flooring, etc.) rendering the affordable units less expensive.

Finally, inclusionary zoning could be used to address a common objection to affordable housing—that there is too much of it concentrated in a few neighborhoods. Requiring a relative equitable distribution of affordable housing units throughout the Urban County would assure that every municipality outside of impacted areas is providing a fair share.

e. Definition of Family

Restrictive definitions of family may impede unrelated individuals from sharing a dwelling unit. Defining family broadly advances non-traditional families and supports the blending of families who may be living together for economic purposes. Restrictions in the definition of family typically cap the number of unrelated individuals that can live together. These restrictions can impede the development of group homes, effectively impeding housing choice for the disabled. However, in some cases, caps on unrelated individuals residing together may be warranted to avoid overcrowding, thus creating health and safety concerns.

The ordinances reviewed for the AI could be divided into four categories based on the definition of "family." The first category, consisting of the City of Louisville and the Village of Minerva, specify no definition for "family." In both municipalities, the absence of the definition implies that any group may exist as a single household.

The second category, which includes Osnaburg Township and the Village of Brewster, defines the term in very broad and inclusive ways. There were no limits places on the number of related or unrelated individuals living together. The definitions advance non-traditional families and support the blending of families who may be living together for economic reasons that could otherwise limit their housing choice.

Jackson Township, which limits the number of unrelated individuals to five persons, represents the third category. While this cap can restrict housing choice for non-traditional families, the regulations make exceptions for group homes.

Finally, North Canton limits the number of unrelated individuals to three, a cap that can restrict housing choice for non-traditional families. A separate cap of five is placed on the number of persons who can live in a group home. This is inconsistent with the Fair Housing Act.

Observation

Restricting the number of unrelated persons who live together as a family is inconsistent with the Fair Housing Act if the restriction limits the number of persons who can live together in a group home.

f. Regulations for Group Homes for Persons with Disabilities

Group homes are residential uses that do not adversely impact a community. Efforts should be made to ensure group homes can be easily accommodated throughout the community under the same standards as any other residential use. Of particular concern are those that serve members of the protected classes such as the disabled. Because a group home for the disabled serves to provide a non-institutional experience for its occupants, imposing conditions are contrary to the purpose of a group home. More importantly, the restrictions, unless executed against all residential uses in the zoning district, are an impediment to the siting of group homes in violation of the Fair Housing Act.

Two primary purposes of a group home residence are normalization and community integration. By allowing group residences throughout the community in agreement with the same standards as applied to all other residential uses occupied by a family, the purposes of the use are not hindered and housing choice for the disabled is not impeded. Towards this end, municipalities may not impose distancing requirements on group homes for persons with disabilities.

The Village of Minerva and the City of Louisville, aside from placing no restrictions on who may live together as a single family, do not specify any rules regarding group homes for persons with disabilities. The absence of restrictions implies that such dwellings can be established in any residential district, subject to the existing regulations on single-family dwellings.

In the Village of Brewster, group homes with up to eight residents qualify as single-family households and may locate in any residential district, while similar facilities for nine or more residents must be located in medium- and higher-density districts. This arrangement is consistent with commonly accepted fair housing standards.

Jackson Township also allows group homes for up to eight residents to seek establishment in any single-family dwelling unit in any residential district. However, the ordinance specifies that it does not consider addiction to a controlled substance to substantiate a disability. Under the federal Fair Housing Act, disability is broadly defined to include any physical or mental condition that creates a substantial "major life impairment," including actual impairments, a history of disability or a mistaken belief that a person is disabled. Current illegal drug users are not protected, but people who are in substance abuse recovery programs are. Thus, the Federal Fair Housing Act prohibits discrimination against those recovering from substance abuse. In the administration of its zoning laws, the Township should take care to avoid this type of discrimination.

Osnaburg Township uses the threshold of eight to delineate between "family homes" and "group homes," which have between nine and 16 residents. Family homes with up to eight residents are permitted by right in all residential districts except manufactured home parks, while larger group homes cannot be located within one mile of existing similar facilities. This one-mile buffer represents an additional restriction that is inconsistent with the Fair Housing Act. Additionally, Osnaburg's definition for both "family home" and "group home" specify that such facilities serve persons with developmental disabilities. The ordinance should be amended to broaden the use of family homes and group homes to all persons with disabilities, as defined by the Fair Housing Act, which would also include those with mobility or sensory impairments.

Finally, the City of North Canton places a cap of five on the number of persons allowed to live together as a group home and additionally requires that the creation of any such facility in any district must be approved by the Planning Commission. The imposition of this extra burden on group homes is inconsistent with the Fair Housing Act. The City should amend its zoning ordinance to allow group residences throughout the community with the same standards that are applied to all single-family residential uses.

Observation

As the Urban County is responsible to affirmatively further fair housing within its boundaries, the Stark County Regional Planning Commission should work with communities where CDBG and HOME funds are spent to ensure that zoning regulations are consistent with fair housing standards, particularly as they relate to the regulation of group homes for persons with disabilities.

For municipalities with zoning ordinances that contain impediments to fair housing, the Urban County should not allocate CDBG, HOME, or any other County funds until the ordinances are amended and the impediments eliminated.

D. Private Sector Policies

i. Mortgage Lending Practices

Under the terms of the Financial Institutions Reform, Recovery, and Enforcement Act of 1989 (F.I.R.R.E.A.), any commercial lending institution that makes five or more home mortgage loans must report all residential loan activity to the Federal Reserve Bank under the terms of the Home Mortgage Disclosure Act (HMDA). The HMDA regulations require most institutions involved in lending to comply and report information on loans denied, withdrawn, or incomplete by race, sex, and income of the applicant. The information from the HMDA statements assists in determining whether financial institutions are serving the housing needs of their communities. The data also helps to identify possible discriminatory lending practices and patterns.

The most recent HMDA data available for the Urban County is from 2007 to 2009. Reviewing this data helps to determine the need to encourage area lenders, other business lenders, and the community at large to actively promote existing programs and develop new programs to assist residents in securing home mortgage loans for home purchases. The data focus on the number of homeowner mortgage applications received by lenders for home purchase of one- to four-family dwellings and manufactured housing units in the Urban County. The information provided is for the primary applicant only. Co-applicants were not included in the analysis. In addition, where no information is provided or categorized as not applicable, no analysis has been conducted due to lack of information. Figure 6-27 summarizes three years of HMDA data by race, ethnicity, and action taken on the applications, with detailed information to follow.

Figure 6-28

Summary Report Based on Action Taken Mortgage Data, 2007-2009

	2007		2008		2009	
	#	%	#	%	#	%
Mortgages applied for	**2,483**	**100.0%**	**1,800**	**100.0%**	**1,684**	**100.0%**
Black	47	1.9%	23	1.3%	23	1.4%
White	2,274	91.6%	1,660	92.2%	1,558	92.5%
Asian	19	0.8%	18	1.0%	14	0.8%
Hispanic*	17	0.7%	19	1.1%	12	0.7%
Other race	9	0.4%	5	0.3%	13	0.8%
No information/NA	134	5.4%	94	5.2%	76	4.5%
Mortgages originated	**1,866**	**75.2%**	**1,334**	**74.1%**	**1,337**	**79.4%**
Black	25	53.2%	11	47.8%	16	69.6%
White	1,748	76.9%	1,242	74.8%	1,247	80.0%
Asian	16	84.2%	15	83.3%	11	78.6%
Hispanic*	10	58.8%	11	N/A	11	91.7%
Other race	5	55.6%	3	60.0%	10	76.9%
No information/NA	72	53.7%	63	67.0%	53	69.7%
Mortgages denied	**275**	**11.1%**	**219**	**12.2%**	**183**	**10.9%**
Black	12	25.5%	8	34.8%	6	26.1%
White	235	10.3%	188	11.3%	159	10.2%
Asian	-	0.0%	2	11.1%	2	14.3%
Hispanic*	4	23.5%	3	N/A	-	0.0%
Other race	2	22.2%	1	20.0%	-	0.0%
No information/NA	26	19.4%	20	21.3%	16	21.1%

Note: Data is for home purchase loans for owner-occupied one-to-four family and manufactured units. Total applications do not include loans purchased by another institution. Other application outcomes include approved but not accepted, withdrawn and incomplete.

* Hispanic ethnicity is counted independently of race.

Source: Federal Financial Institutions Examination Council, 2007-09

The most obvious trend in 2007-09 HMDA data for the Urban County is the steep drop in the number of loan applications during those years. This can be attributed primarily to stagnating home sales rates in the County that coincided with the national housing market crisis. The number of loan applications dropped by 683 (27.5%) from 2007 to 2008, then fell by an additional 116 (6.4%) in 2009. During the three-year period, minority applications, already low in 2007 due to the small size of these groups in the overall population, declined along with overall applications.

The number of loan applications resulting in originations fell by 532 (28.5%) from 2007 to 2008, then remained steady into 2009. This drop in originations is not surprising given the large decline in applications. Since the number of applications continued to decrease into 2009, the proportion of applications resulting in an origination increased, reaching 79.4% in 2009.

The number of denials also fell along with applications and originations, decreasing by 92 (33.5%) from 2007 to 2009. The overall proportion of applications resulting in denials was 10.9% in 2009, slightly lower than the 11.1% rate in 2007.

The following section contains detailed analysis for applications filed in 2009, the latest for which information is available.

Figure 6-29
Summary Report Based on Action Taken Mortgage Data, 2009

	Total Applications*		Originated		Approved Not Accepted		Denied		Withdrawn/ Incomplete	
	#	%	#	%	#	%	#	%	#	%
Loan Type										
Conventional	747	44.4%	590	79.0%	30	4.0%	79	10.6%	48	6.4%
FHA	798	47.4%	643	80.6%	21	2.6%	80	10.0%	54	6.8%
VA	62	3.7%	47	75.8%	2	3.2%	10	16.1%	3	4.8%
FSA/RHS	77	4.6%	57	74.0%	3	3.9%	14	18.2%	3	3.9%
Loan Purpose: Home Purchase										
One to four-family unit	1,656	98.3%	1,327	80.1%	54	3.3%	168	10.1%	107	6.5%
Manufactured housing unit	28	1.7%	10	35.7%	2	7.1%	15	53.6%	1	3.6%
Applicant Race										
American Indian/Alaska Native	11	0.7%	8	72.7%	-	0.0%	-	0.0%	3	27.3%
Asian/Pacific Islander	14	0.8%	11	78.6%	-	0.0%	2	14.3%	1	7.1%
Hawaiian	2	0.1%	2	100.0%	-	0.0%	-	0.0%	-	0.0%
Black	23	1.4%	16	69.6%	1	4.3%	6	26.1%	-	0.0%
Hispanic**	12	0.7%	11	91.7%	-	0.0%	-	0.0%	1	8.3%
White	1,558	92.5%	1,247	80.0%	55	3.5%	159	10.2%	97	6.2%
No information	76	4.5%	53	69.7%	-	0.0%	16	21.1%	7	9.2%
Not applicable	-	0.0%	-	N/A	-	N/A	-	N/A	-	N/A
Applicant Sex										
Male	1,188	70.5%	942	79.3%	41	3.5%	118	9.9%	87	7.3%
Female	439	26.1%	354	80.6%	15	3.4%	55	12.5%	15	3.4%
No information	57	3.4%	41	71.9%	-	0.0%	10	17.5%	6	10.5%
Not applicable	-	0.0%	-	N/A	-	N/A	-	N/A	-	N/A
Total	1,684	100.0%	1,337	79.4%	56	3.3%	183	10.9%	108	6.4%

Source: Federal Financial Institutions Examination Council, 2009

Note: Percentages in the Approved, Approved Not Accepted, Denied, and Withdrawn/Incomplete categories are calculated for each line item with the corresponding Total Applications figures. Percentages in the Total Applications categories are

* Total applications do not include loans purchased by another institution.

** Hispanic ethnicity is counted independently of race.

a. Conventional Loans vs. Government-Backed Loans

Loan types in 2009 included conventional mortgage loans and a variety of government-backed loans, including FHA and VA. Comparing these loan types helps to determine if the less stringent underwriting standards and lower down payment requirements of government-backed loans expand home ownership opportunities. In Stark County, 55.6% (937) of households that applied for a mortgage loan applied for a government-backed loan. Among minority households the rate of application for a government-backed loan was significantly higher. Of the 62 loan applications from minority households in 2009, 45 (72.6%) were from minority households.

The denial rates for loan types were as follows:

- FHA loans: 10.0% (80 of 798 applications).
- VA-guaranteed loans: 16.1% (10 of 62 applications).
- Conventional loans: 10.6% (79 of 747 applications).
- FSA/RHS loans: 18.2% (14 of 77 applications).

b. Denial of Applications

In 2009, the mortgage applications of 183 households in Stark County were denied (8.1%). Denial reasons were given for 158 applications and included the following:

- Debt-to-income ratio: 23.5%
- Credit history: 19.7%
- Collateral: 15.3%
- Credit Application Incomplete: 11.5%
- Employment History: 6.0%
- Insufficient Cash: 3.3%
- Unverifiable information: 3.3%
- Other: 3.3%

Observation

Poor credit and high debt-to-income ratios were the two main reasons for mortgage denials. Even in an area with relatively affordable housing, low-moderate income households may not be able to obtain a home mortgage for these reasons.

Figure 6-30
Denials by Race and Ethnicity, 2007-2009

	2007			2008			2009		
	Total Apps**	Denials	Denial Rate	Total Apps**	Denials	Denial Rate	Total Apps**	Denials	Denial Rate
Am. Indian/Alaska Native	5	0	0.0%	4	1	25.0%	11	0	0.0%
Asian	19	0	0.0%	18	2	11.1%	14	2	14.3%
Black	47	12	25.5%	23	8	34.8%	23	6	26.1%
Haw aiian	4	2	50.0%	1	0	0.0%	2	0	0.0%
White	2,274	235	10.3%	1660	188	11.3%	1,558	159	10.2%
Not Provided	134	26	19.4%	94	20	21.3%	76	16	21.1%
Hispanic*	17	4	23.5%	19	3	15.8%	12	0	0.0%

* Hispanic ethnicity is counted independently of race.

**Total applications do not include loans purchased by another institution

Between 2007 and 2009, the denial rates for White and Black households, the two largest racial groups, increased from 2007 to 2008 and then dropped back to comparable levels in 2009. For each of the three years, the denial rate for Blacks was more than double that of Whites. In 2009, the denial rate for Whites was 10.2% versus 26.1% for Black applicants. However, care should be taken when interpreting these figures as the sample size of Black households is much smaller than that of White households. The number of applications from other racial and ethnic minority groups is too small to reliably analyze.

Observation

Though the number of minority mortgage applicants was too small for statistical significance, the denial rate for Black mortgage applicants was consistently at least double the denial rate for White mortgage applicants.

For this analysis, lower-income households include those with incomes between 0%-80% of MFI, while upper-income households include households with incomes above 80% MFI.

Lower-income households had a higher denial rate than upper-income households in each year from 2007 to 2009. The share of applications coming from lower-income households rose over the three-year period. In 2007 28.9% of applications were from lower-income households. By 2009, this figure was 41.4%. The proportion of denials from lower-income households also rose over the time period but out of proportion to the number of applications. In 2009 lower-income households accounted for 56.3% of all denials, up from 39.3% in 2007.

Figure 6-31
Denials by Income, 2007-2009

	2007			2008			2009		
	Total Apps**	Denials	Denial Rate	Total Apps**	Denials	Denial Rate	Total Apps**	Denials	Denial Rate
Below 80% MFI	718	108	15.0%	542	97	17.9%	697	103	14.8%
At least 80% MFI	1733	163	9.4%	1246	120	9.6%	974	79	8.1%
Total	2483	275	11.1%	1800	219	12.2%	1,684	183	10.9%

Note: Total includes applications for w hich no income data w as reported
*Total applications do not include loans purchased by other institutions

Given the low number of loan applications from racial and ethnic minorities, there are too few applications to reliably make comparisons between different racial or ethnic groups and/or different income levels from year to year.

Figure 6-32
Denials by Race for Lower-income Applicants, 2007-2009

	2007			2008			2009		
	Total Apps**	Denials	Denial Rate	Total Apps**	Denials	Denial Rate	Total Apps**	Denials	Denial Rate
Am. Indian/Alaska Native	2	0	0.0%	1	1	100.0%	1	0	0.0%
Asian	4	0	0.0%	2	0	0.0%	7	2	28.6%
Black	9	2	22.2%	7	4	57.1%	7	2	28.6%
Haw aiian	3	1	33.3%	0	N/A	N/A	1	0	0.0%
White	660	92	13.9%	507	86	17.0%	657	89	13.5%
Not Provided	40	13	32.5%	25	6	24.0%	24	10	41.7%
Hispanic**	8	4	50.0%	6	2	33.3%	5	0	0.0%
Total	718	108	15.0%	542	50	9.2%	697	103	14.8%

*Total applications do not include loans purchased by another institution
**Hispanic ethnicity is counted independently of race.

Among White households, the denial rate for lower-income applicants is higher than that for upper-income applicants each year from 2007-2009. In 2007, it was 13.9% versus 8.8%; in 2008, 17.0 % versus 8.8%; and in 2009, 13.5% versus 7.9%. The number of applicants submitted by non-Whites is too small to reliably analyze.

Figure 6-33
Denials by Race for Upper-income Applicants, 2007-2009

	2007			2008			2009		
	Total Apps**	Denials	Denial Rate	Total Apps**	Denials	Denial Rate	Total Apps**	Denials	Denial Rate
Am. Indian/Alaska Native	3	0	0.0%	3	0	0.0%	10	0	0.0%
Asian	15	0	0.0%	16	2	12.5%	7	0	0.0%
Black	38	10	26.3%	16	4	25.0%	16	4	25.0%
Haw aiian	1	1	100.0%	1	0	0.0%	1	0	0.0%
White	1586	140	8.8%	1141	100	8.8%	889	70	7.9%
Not Provided	90	12	13.3%	69	14	20.3%	51	5	9.8%
Hispanic**	9	0	0.0%	13	1	7.7%	7	0	0.0%
Total	1733	163	9.4%	1246	25	2.0%	974	79	8.1%

*Total applications do not include loans purchased by another institution
**Hispanic ethnicity is counted independently of race.

Observation

While the number of minority loan applications and denials were too small to draw statistically significant conclusions, this trend warrants continuing monitoring to determine if patterns consistent with discrimination exist.

ii. High-Cost Lending Practices

The widespread housing finance market crisis of recent years has brought a new level of public attention to lending practices that victimize vulnerable populations. Subprime lending, designed for borrowers who are considered a credit risk, has increased the availability of credit to low-income persons. At the same time, subprime lending has often exploited borrowers, piling on excessive fees, penalties and interest rates that make financial stability difficult to achieve. Higher monthly mortgage payments make housing less affordable, increasing the risk of mortgage delinquency and foreclosure and the likelihood that properties will fall into disrepair.

Some subprime borrowers have credit scores, income levels and down payments high enough to qualify for conventional, prime loans, but are nonetheless steered toward more expensive subprime mortgages. This is especially true of minority groups, which tend to fall disproportionately into the category of subprime borrowers. The practice of targeting minorities for subprime lending qualifies as mortgage discrimination.

Since 2005, Housing Mortgage Disclosure Act data has included price information for loans priced above reporting thresholds set by the Federal Reserve Board. This data is provided by lenders via Loan Application Registers and can be aggregated to complete an analysis of loans by lender or for a specified geographic area. HMDA does not require lenders to report credit scores for applicants, so the data does not indicate which loans are subprime. It does, however, provide price information for loans considered "high-cost."

A loan is considered high-cost if it meets one of the following criteria:

- A first-lien loan with an interest rate at least three percentage points higher than the prevailing U.S. Treasury standard at the time the loan application was filed. The standard is equal to the current price of comparable-maturity Treasury securities.
- A second-lien loan with an interest rate at least five percentage points higher than the standard.

Not all loans carrying high APRs are subprime, and not all subprime loans carry high APRs. However, high-cost lending is a strong predictor of subprime lending, and it can also indicate a loan that applies a heavy cost burden on the borrower, increasing the risk of mortgage delinquency.

a. Home Purchase Loans

In 2009, there were 1,337 home purchase loans made for single-family or manufactured housing units in the Urban County. Of this total, 1,328 disclosed the borrower's household income and 91 (6.9%) reported high-cost mortgages. For both lower- and upper-income households, high-cost loans decreased as a proportion of loan originations between 2007 and 2009. This could be due to policy changes that have limited subprime lending and/or to the necessity for lenders to make rates more competitive as the total number of applications dropped.

Overall, lower-income households were more likely to have high-cost mortgages than upper-income households. In addition, Blacks were slightly more likely to have a high-cost loan than Whites. Across the three years analyzed, 11.5% of Blacks had a high-cost loan compared to 9.3% of Whites. Once again, however, the number of Black home mortgage loan applications and total high-cost mortgages were too small to reliably analyze.

Figure 6-34
High-Cost Home Purchase Loans by Race/Ethnicity and Income, 2007-2009

		Lower Income			Upper Income		
		Total Originations	High-Cost	% High-Cost	Total Originations	High-Cost	% High-Cost
2007	Am. Indian/Alaska Native	1	0	N/A	2	0	0.0%
	Asian	3	0	0.0%	13	2	15.4%
	Black	3	0	0.0%	22	4	18.2%
	Hawaiian	2	1	50.0%	0	N/A	N/A
	White	470	62	13.2%	1,256	100	8.0%
	No information/NA	20	3	15.0%	51	5	9.8%
	Hispanic*	3	0	0.0%	7	1	14.3%
	Total	**499**	**66**	**13.2%**	**1,344**	**111**	**8.3%**
2008	Am. Indian/Alaska Native	0	N/A	N/A	2	0	0.0%
	Asian	2	0	0.0%	13	2	15.4%
	Black	2	1	50.0%	9	0	0.0%
	Hawaiian	0	N/A	N/A	1	0	0.0%
	White	350	54	15.4%	884	90	10.2%
	No information/NA	17	3	17.6%	46	4	8.7%
	Hispanic*	2	0	0.0%	9	1	11.1%
	Total	**371**	**58**	**15.6%**	**955**	**96**	**10.1%**
2009	Am. Indian/Alaska Native	0	N/A	N/A	8	2	25.0%
	Asian	5	0	0.0%	6	0	0.0%
	Black	5	1	20.0%	11	0	0.0%
	Hawaiian	1	0	0.0%	1	0	0.0%
	White	511	39	7.6%	727	45	6.2%
	No information/NA	13	1	7.7%	40	3	7.5%
	Hispanic*	4	0	0.0%	7	1	14.3%
	Total	**535**	**41**	**7.7%**	**793**	**50**	**6.3%**
Three-Year Totals		**1,405**	**165**	**11.7%**	**3,092**	**257**	**8.3%**

Note: Does not include loans for which no income data was reported: 23 in 2007, 8 in 2008 and 9 in 2009.
* Hispanic ethnicity is counted independently of race.

b. Refinancing Loans

This analysis also looks at high-cost lending among refinancing loans. A refinanced loan replaces an original mortgage and allows borrowers to take advantage of lower rates, switch from a variable to a fixed-rate mortgage, consolidate debt, and/or receive cash using the home's equity.

In the Urban County in 2009, there were 2,761 refinancing loans and 2,446 for which income was reported. Of these, 139 (5.7%) were high-cost loans.

Similar to home purchase loans, Blacks tended to be over-represented in high-cost refinancing. Among refinancing loans from 2007 to 2009, 16.3% of Blacks had a high-cost loan compared to 12.4% of Whites. Similar to home purchase loans, lower-income households were more likely to have high-cost refinancing loans than upper-income households. However, the overall number of Black households receiving home mortgage loans and high-cost loans was too small to reliably analyze.

Figure 6-35

High-Cost Refinancing Loans by Race/Ethnicity and Income, 2007-2009

		Lower Income			Upper Income		
		Total Originations	High-Cost	% High-Cost	Total Originations	High-Cost	% High-Cost
2007	Am. Indian/Alaska Native	0	N/A	N/A	4	2	50.0%
	Asian	2	0	0.0%	2	0	0.0%
	Black	6	3	50.0%	16	2	12.5%
	Hawaiian	3	1	33.3%	2	0	0.0%
	White	412	95	23.1%	1,225	227	18.5%
	No information/NA	39	13	33.3%	130	18	13.8%
	Hispanic*	1	0	0.0%	14	5	35.7%
	Total	**462**	**112**	**24.2%**	**1,379**	**249**	**18.1%**
2008	Am. Indian/Alaska Native	0	N/A	N/A	2	1	50.0%
	Asian	2	1	50.0%	4	0	0.0%
	Black	2	0	0.0%	7	1	14.3%
	Hawaiian	1	0	0.0%	2	0	0.0%
	White	317	71	22.4%	936	110	11.8%
	No information/NA	28	6	21.4%	72	8	11.1%
	Hispanic*	2	1	50.0%	9	2	22.2%
	Total	**350**	**78**	**22.3%**	**1,023**	**120**	**11.7%**
2009	Am. Indian/Alaska Native	1	1	100.0%	1	0	0.0%
	Asian	1	0	0.0%	12	0	0.0%
	Black	1	0	0.0%	17	2	11.8%
	Hawaiian	0	N/A	N/A	1	0	0.0%
	White	515	44	8.5%	1,692	86	5.1%
	No information/NA	51	3	5.9%	154	3	1.9%
	Hispanic*	3	1	33.3%	17	1	5.9%
	Total	**569**	**48**	**8.4%**	**1,877**	**91**	**4.8%**
Three-Year Totals		**1,381**	**238**	**17.2%**	**4,279**	**460**	**10.8%**

Note: Does not include loans for which no income data was reported: 55 in 2007, 72 in 2008 and 315 in 2009.
* Hispanic ethnicity is counted independently of race.

E. Assessment of Current Fair Housing Policies, Programs, and Activities

i. Progress since Previous AI

The last AI for the ACMS region was completed in 2002. Seven region-wide impediments were identified in this study, including:

- Lack of knowledge about fair housing laws and enforcement,
- Insurance companies provide limited services or refuse to insure properties in older or less desirable neighborhoods,
- Segregated housing patterns,

- Difficulty finding landlords who accept Section 8 Vouchers,
- Limited funding that restricts the Section 8 program,
- Developers and builders who are not complying with multi-family accessibility provisions,
- Housing in need of major repairs, which LMI households cannot afford, and
- Minorities tend not to purchase outside of impacted areas and non-minorities do not pursue housing opportunities in neighborhoods that are predominately minority.

The County dedicates a substantial amount of CDBG resources each year to pure fair housing activities and expands fair housing choice through its CDBG and HOME programs, but does not include a detailed explanation in annual CAPER reporting of how its actions address the impediments previously identified. Generally, entitlement grantees account for progress in addressing impediments in the CAPER.

Observation

In future CAPER reporting, SCRPC should include a section on Affirmatively Furthering Fair Housing that draws clear connections between fair housing program activities and strategies to address the impediments identified in the AI.

ii. Current Fair Housing Programs and Activities

Stark County's fair housing programs are operated by Stark County Regional Planning Commission (SCRPC). SCRPC has a full-time Fair Housing Director and provides counseling on tenant-landlord rights and fair housing laws, processes and investigates discrimination claims, sponsors educational workshops and seminars, monitors discrimination compliance, and produces fair housing literature.

SCRPC is also responsible for receiving and investigating fair housing complaints in Stark County, and the Commission will file complaints with HUD when necessary.

To increase access to affordable housing, the County offers housing programs such as down payment assistance and housing rehabilitation to LMI home owners.

F. General Fair Housing Observations

This section of the AI is a summary of general observations included in earlier sections of the report. General observations include the results of primary and secondary research that define the underlying conditions, trends, and context for fair housing planning in the Urban County. These observations in and of themselves do not necessarily constitute impediments to fair housing choice. Rather, they establish a contextual framework for the impediments to fair housing choice that are presented in the following section of the AI.

i. Demographics and Income

a. **Minorities increased from 2.8% to 5.3% of the total population between 1990 and 2009.** Blacks remain the largest minority group. However, the fastest-growing two segments of the population have been Asian/Pacific Islanders and Hispanics, which increased 159.1% and 69.5%, respectively.

b. **There are two areas of minority concentration of Black residents in the Urban County.** Tract 7002, bordering northeast Canton and tract 7140, bordering northwest Massillon, are areas of concentration of Black residents.

c. **The Urban County is moderately segregated.** According to dissimilarity index data, 39.1% of Black persons would have to move to a different location in the Urban County in order to achieve full integration.

d. **Blacks and Hispanics experienced poverty at much higher rates than Whites in the Urban County in 2008.** The median household income for Blacks was less than half of Whites, and Hispanics had a median income equivalent to 70.7% of Whites. Blacks and Hispanics also had poverty rates of 37.4% and 20.3%, respectively, compared to 9.4% for Whites. Consequently, Black and Hispanic households will have a more difficult time finding affordable housing.

e. **Persons with disabilities were more likely to live in poverty than persons without disabilities.** Among all persons with a disability in 2000, 8.2% lived in poverty compared to 4.1% of persons without disabilities.

f. **Female-headed households with children were more likely to live in poverty.** Female-headed households with children accounted for more than 40% of all families living in poverty. Consequently, securing affordable housing will be especially difficult for this segment of the population.

g. **Blacks were three times as likely to be unemployed as Whites in Stark County in 2008.** Almost 20% of Blacks were unemployed in 2008 compared to 6.1% of Whites. Higher unemployment, whether temporary or permanent, will mean less disposable income for housing expenses.

ii. Housing

a. **Between January 2007 and June 2008, the Urban County had a foreclosure rate of 6.3%.** The two census tracts of Black concentration, 7002 and 7140, had foreclosure rates of 15.1% and 8.2%, respectively.

b. **Lower household incomes among Blacks and Hispanics are reflected in lower home ownership rates when compared to Whites.** Among minorities, 58% of Blacks and 62.4% of Hispanics were home owners, compared to 79.1% of Whites.

c. **Black households were much more likely to live in larger families than White households.** Among Black families, 62.4% had three or more persons compared to 54.6% of White families. However, only 22.9% of the rental housing stock contains three or more bedrooms compared to 82.6% of the owner housing stock.

d. **The Urban County lost almost half of its units renting for less than $500 between 2000 and 2008.** By comparison, units renting for more than $1,000 tripled from 659 to 2,043 units.

e. **Minimum-wage and single-income households cannot afford a housing unit renting for the HUD fair market rent in Stark County.** Minorities and female-headed households will be disproportionately impacted because of their lower incomes.

f. **Persons with disabilities receiving a monthly SSI check of $674 as their sole source of income cannot afford a one-bedroom unit renting at the fair market rate of $510.**

g. **Lower-income Black renters experienced housing problems at greater rates than White and Hispanic renters.** Among renter households, 63.1% of Blacks had housing problems, compared to 51.4% of Whites and 33.3% of Hispanics.

h. **Stark County's latest comprehensive plan, the 2020 Land Use Plan, demonstrates the County's commitment to affirmatively furthering fair housing choice** through a clear statement of intent supported by a set of policies designed to create a wider array of housing options in all areas of the County that are appropriate for residential development.

G. Potential Impediments and Recommendations

i. Public Sector

a. SCRPC's requirement that proposed HOME projects gain evidence of support from residents within the project's targeted neighborhood makes proposed affordable housing projects susceptible to defeat by not-in-my-backyard (NIMBY) attitudes.

Gaining the required support for an affordable multifamily rental project in many non-impacted areas, for example, could be difficult under the current guidelines. Furthermore, if a comparable market-rate multi-family development were not required to secure the same level of community support, this type of action could be viewed as discriminating against lower-income minority households.

Recommended Action Step: Amend the HOME application requirements and program guidelines to remove this requirement.

b. SCRPC's entitlement grant planning documents could be improved from a fair housing standpoint.

There is no local definition for areas of minority concentration, and the CAPER does not clearly report on the impact of fair housing activities on identified impediments to fair housing choice.

Recommended Action Step: Amend the Consolidated Plan to include a definition of areas of minority concentration. Carry the definition through to Annual Action Plans and use it to balance spending between revitalizing impacted areas and creating new housing opportunities in non-impacted areas.

Recommended Action Step: In future CAPER reporting, draw a clear connection between fair housing activities and strategies to address the impediments identified in the latest AI.

c. SCRPC's HOME Policy and Compliance Manual could be improved from a fair housing standpoint.

SCRPC should amend its HOME Policy and Compliance Manual to expand upon its affirmative marketing requirements, more specifically stating what actions are required on the part of owners, developers or sponsors and what corrective actions will be taken in the event of noncompliance.

Additionally, the Manual could be amended to include a written policy that encompasses the site selection requirements at 24 CFR 983.6 and that can be more formally incorporated as part of the application review and approval process for all applicable HOME-assisted projects. Such a policy will facilitate the County's goals toward affirmatively furthering fair housing.

Recommended Action Step: Update the Manual accordingly.

Recommended Action Step: Once a site selection policy is established and added to the Manual, it should be distributed to all affordable housing providers, builders and developers as part of the HOME application package. HUD's site and neighborhood standards should also be incorporated into the County's written agreements with developers, subrecipients and CHDOs.

d. It is unclear whether the Urban County currently provides adequate access to its growing foreign-language populations in the provision of its services.

As of 2009 estimates, more than 4,100 people across the County, including Alliance, Canton and Massillon, spoke English less than "very well." This population may need assistance accessing local government programs and services.

The County must determine the need for a Language Access Plan (LAP) to assist persons with limited English proficiency (LEP) in accessing its programs and services. This involves taking reasonable steps to ensure meaningful access in accordance with Executive Order 13166 of 2001 and Section V of the Federal Register, Volume 72, Number 13 on Monday, January 22, 2007.

Recommended Action Step: To determine what language assistance accommodations will need to be made, the County can complete a four-factor analysis and implementation plan (language access plan) following HUD's LEP guidance. If it is determined that a need for an LAP exists, the County should prepare the LAP to comply with Title VI of the Civil Rights Act of 1964.

e. The zoning ordinances reviewed for the AI indicate that local units of government that participate in the Urban County's entitlement grant programs may not unequivocally understand their responsibility to affirmatively further fair housing choice.

As the Urban County is responsible to affirmatively further fair housing within its boundaries, the Stark County Regional Planning Commission should work with communities where CDBG and HOME funds are spent to ensure that local practices are consistent with fair housing standards.

Although all of the zoning ordinances reviewed in the Urban County were noted to permit housing types that might be affordable, the amount of land zoned and available for the development of multi-family housing was minimal. In the unincorporated townships reviewed, the majority of land is reserved for single-family housing with minimum lot sizes of 20,000 square feet or more. These areas are prohibitive of the development of smaller, more affordable residential communities.

Restricting the number of unrelated persons who live together as a family is inconsistent with the Fair Housing Act if the restriction limits the number of persons who can live together in a group home. During the AI review, one community was noted to limit the number of unrelated persons who may live in a home to five, which restricts choice for non-traditional families. However, the community made exceptions for group homes, making the definition compliant with fair housing standards, if not ideally permissive. Another community restricted the number of unrelated persons who may live in a home to three, with no exceptions. This is inconsistent with the Fair Housing Act.

Two primary purposes of a group home residence are normalization and community integration. By allowing group residences throughout the community in agreement with the same standards as applied to all other residential uses occupied by a family, the purposes of the use are not hindered and housing choice for the disabled is not impeded. Toward this end, municipalities may not impose distancing requirements on group homes for persons with disabilities. One of the communities placed a cap of five on the number of persons allowed to live together as a group home and additionally requires that the creation of any such facility in any district must be approved by the Planning Commission. The imposition of this extra burden on group homes is inconsistent with the Fair Housing Act.

Recommended Action Step: SCRPC should provide technical land use planning assistance to local units of government aimed at identifying and overcoming procedural and regulatory barriers to fair housing and affordable housing. Local elected officials, planning commission members and zoning hearing board members should be offered training through technical workshops.

Recommended Action Step: The Urban County should refuse to grant CDBG, HOME, or any other County funds to municipalities that the SCRPC determines are engaging in unlawful housing discrimination through local zoning regulations.

Recommended Action Step: SCRPC should closely monitor and advise local government zoning and land use policies and practices. The Commission should promote the use and adoption of model ordinances, especially as they relate to the removal of barriers to affordable housing and accommodating group homes for persons with disabilities.

Recommended Action Step: The Urban County should require that all entitlement funding recipients certify that they will affirmatively further fair housing.

ii. Private Sector

a. **Patterns of lending discrimination appear to exist in the Urban County, though the number of loans analyzed between 2007 and 2009 is too small to produce statistically valid conclusions.** The denial rate for Black mortgage applicants was consistently at least double the denial rate for White applicants.

Recommended Action Step: Arrange housing counselors to provide credit repair advice on a public basis in order to ensure to the extent possible that members of the protected classes have access to means of improving their ability to obtain and maintain decent, affordable housing.

H. Fair Housing Action Plan

	Planned Action Year					Responsible Entity
	2012	2013	2014	2015	2016	
Amend policy and program documents to affirmatively further fair housing						
Amend the HOME application and program guidelines to remove the requirement that proposed projects gain evidence of support from residents within the project's targeted neighborhood.	•					SCRPC
Conduct the four-factor analysis outlined at www.lep.gov to determine the extent to which the translation of vital documents is necessary to assist persons with limited English proficiency in accessing County programs and services. This action could be a regional undertaking initiated by SCRPC.		•				SCRPC
Update the HOME Policy and Compliance Manual to expand upon its affirmative marketing requirements, more specifically stating what actions are required on the part of owners, developers or sponsors and what corrective actions will be taken in the event of noncompliance.	•					SCRPC
Update the HOME Policy and Compliance Manual to include a site selection policy that encompasses the requirements at 24 CFR 983.6. Formally incorporate the policy into the application review and approval process for all applicable HOME-assisted projects.	•	•	•	•	•	SCRPC
Amend the Consolidated Plan to include a definition of areas of racial/ethnic concentration. Carry the definition through Annual Action Plans and use it to balance spending between revitalizing impacted areas and creating new housing opportunities in non-impacted areas.	•	•	•	•	•	SCRPC
In future CAPER reporting, draw a clear connection between fair housing activities and strategies to address the impediments identified in the latest AI.	•	•	•	•	•	SCRPC

cont'd …

	Planned Action Year					Responsible Entity
	2012	2013	2014	2015	2016	
Expand the supply of housing available to persons making up to 80% of MHI, especially in non-impacted areas.						
Expand incentives for property owners and investors to build new apartment buildings or substantially rehabilitate existing buildings for occupancy by lower-income families, specifically in areas of opportunity.	•	•	•	•	•	
Ensure that participating communities unequivocally understand the responsibility to affirmatively further fair housing choice.						
Provide technical land use planning assistance to local units of government aimed at identifying and overcoming procedural and regulatory barriers to affordable housing and fair housing.	•	•	•	•	•	SCRPC
Establish a policy of refusing to grant CDBG or HOME funds to municipalities that the SCRPC determines are engaging in unlawful housing discrimination through local regulations.		•				SCRPC
Promote the use of model ordinances, especially as they relate to the removal of barriers to affordable housing and accommodating group homes for persons with disabilities.	•	•	•	•	•	SCRPC
Establish a policy to require that all entitlement funding recipients certify that they will affirmatively further fair housing.	•					SCRPC
Expand community awareness and involvement in fair housing issues.						
Arrange housing counselors to provide credit repair advice on a public basis in order to ensure to the extent possible that members of the protected classes have access to means of improving their ability to obtain and maintain decent, affordable housing.	•	•	•	•	•	
Continue educational and outreach efforts to broaden awareness of rights and responsibilities under the Fair Housing Act.	•	•	•	•	•	

I. Signature Page for the Urban County

By my signature I certify that the Analysis of Impediments to Fair Housing Choice for the Urban County of Stark County is in compliance with the intent and directives of the regulations of the Community Development Block Grant Program and HOME Investment Partnerships Program.

____

(Signature of Authorizing Official)

____

Date

7. Regional Considerations

The analysis of impediments is a review of impediments to fair housing choice in the public and private sectors. Impediments to fair housing choice are any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status or national origin that restrict housing choices or the availability of housing choices, or any actions, omissions or decisions that have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex, disability, familial status or national origin. Policies, practices or procedures that appear neutral on their face but which operate to deny or adversely affect the provision of housing to persons of a particular race, color, religion, sex, disability, familial status, or national origin may constitute such impediments.

This section evaluates circumstances, policies and programs that exist at a regional level across Stark County.

A. Stark Metropolitan Housing Authority

Stark Metropolitan Housing Authority (SMHA) is the regional housing authority for all of Stark County. SMHA manages the public housing and Section 8 Housing Choice Voucher programs that serve the cities of Alliance, Canton and Massillon and the Urban County. SMHA has offices in all three cities. Interviews were conducted with SMHA staff and a questionnaire was completed upon request.

i. Public Housing

a. Inventory

As of June 2011, SMHA owned and operated 2,546 public housing units at 720 sites across Stark County. In total, 875 units (34.7%) had three bedrooms; 700 (27.5%) had one bedroom, 577 (22.7%) had two bedrooms, 141 (5.5%) had four bedrooms, 116 (4.6%) were efficiencies, and 43 (1.7%) had five bedrooms.

Details on the public housing inventory by type are included in figures 7-1 and 7-2. About three-quarters of family units and 84% of elderly units are located in one of the three entitlement cities, largely due to the concentration of population, public services, transit and other amenities in those areas. However, public housing options exist in other areas of Stark County. In particular, more than 400 scattered-site family public housing units provide a wider array of location options for residents. In addition to these units, SMHA owns a Section 202 property in Lake Township.

Figure 7-1
Elderly Public Housing Developments

Development	Units	Year	Location
W.L. Hart Apartments	105	1974	Alliance
Girard Gardens	100	1970	Canton
Kimberle Gardens	31	1971	Canton
McKinley Park	81	1969	Canton
Metropolitan Arms	134	1972	Canton
Plaza Terrace	100	1974	Canton
Roselane Gardens	19	1971	Canton
Sunset Homes	14	1959	Canton
Shortridge Village	40	1982	Jackson Twp.
Constitution Hall	30	1982	Louisville
Lincoln Apts.	105	1974	Massillon
Springhill Gardens	8	1980	Massillon
Witmer Arms	25	1981	Massillon
Reynolds Manor	40	1982	Navarre
Indian Run Manor	25	1982	Waynesburg
Total Elderly Units	**857**		

Source: SMHA, June 2011

Figure 7-2
Family Public Housing Developments

Development	Units	Year	Location
Garfield Homes	16	1974	Alliance
Pike-Mahoning	39	1974	Alliance
Scattered Sites	44	1974	Alliance
Scattered Sites	25	1995	Alliance
Ellisdale Homes	141	1972	Canton
Gage Gardens	54	1971	Canton
Jackson Park	130	1969	Canton
Lesh, Neal Ct., Sct.	90	1974	Canton
Linwood Acres	112	1971	Canton
Mahoning Manor	82	1972	Canton
Scattered Sites	106	1974	Canton
Scattered Sites	22	1982	Canton
Scattered Sites	50	1992	Canton
Sherrick Ct.	196	1963-1965	Canton
Franklin Homes	37	1973	Massillon
Lowery Price	30	1981	Massillon
Underhill Gardens	35	1973	Massillon
Willow Homes	28	1973	Massillon
Scattered Sites	432	1979-1982	Stark County
Indian Run Homes	15	1982	Waynesburg
Total Family Units	**1,684**		

Source: SMHA, June 2011

The structures range in age from 16 to 52 years and consist of varying types, including townhomes, row houses, large apartment buildings and single-family homes. SMHA staff members reported no discernible patterns of concentrations by race or ethnicity in the Authority's public housing developments.

b. Accessibility

Section 504 of the Rehabilitation Act of 1973 and 24 CFR Part 8 require that 5% of all public housing units be accessible to persons with mobility impairments. Another 2% of public housing units must be accessible to persons with sensory impairments. In addition, an Authority's administrative offices, application offices and other non-residential facilities must be accessible to persons with disabilities. The Uniform Federal Accessibility Standards (UFAS) is the standard against which residential and non-residential spaces are judged to be accessible.

SMHA is currently working to reduce a deficit of public housing units deemed accessible by UFAS standards. Section 504 thresholds would require the Authority to provide at least 125 UFAS units, while only 30 such units currently exist in the public housing inventory. This is equivalent to a UFAS deficit of 95 units. In order to address the problem, SMHA has entered into a voluntary compliance agreement (VCA) with HUD that requires SMHA to update its inventory to meet the minimums mandated by Section 504 within a certain number of years. The VCA was not available for review.

Observation

SMHA has entered into a voluntary compliance agreement to renovate the public housing inventory to meet minimum federal accessibility standards. Currently, there is a deficit of 95 units meeting UFAS standards.

c. Waiting List

SMHA maintains separate waiting lists for public housing units in its Alliance, Canton and Massillon offices. All three waiting lists are open to new applicants. In total, 1,906 households were waiting for public housing as of June 2011: 1,098 in Canton, 492 in Massillon and 316 in Alliance. Across all offices, about half of all households waiting for public housing in Stark County consisted of families with children (49.6%). The highest rate of this household type was waiting for units in Alliance, as 227 families with children comprised 71.8% of all household types on the City's list. By comparison, families with children represented only 29.7% of all Stark County households counted in the 2010 Census.

More than one in 10 SMHA waiting list households (13.2%) included at least one member with a disability. Only 2.9% were classified as elderly households.

White households comprised the majority of waiting-list households, at 63.6%, compared to Black households, which accounted for 35.8%. The proportion of Black households was highest on the Canton waiting list, where 458 Black households comprised 41.7% of the total. By comparison, Black households were only 7.2% of all households counted across Stark County in the 2010 Census.

Figure 7-3
Public Housing Waiting Lists

	Alliance	Canton	Massillon	Combined Waiting List	% of All Families
Total Number of Applicants on Waiting List	**316**	**1,098**	**492**	**1,906**	**100.0%**
Income					
Extremely Low (<= 30% AMI)	256	923	411	1,590	83.4%
Very Low (>30% but <= 50% AMI)	45	135	68	248	13.0%
Low (>50% but =<80% AMI)	15	40	13	68	3.6%
Family Type					
Families with Children	227	477	241	945	49.6%
Elderly Families	8	38	10	56	2.9%
Families with Disabilities	39	149	63	251	13.2%
Race/Ethnicity					
Black	75	458	141	674	35.8%
White	240	614	343	1,197	63.6%
Any Other Race	1	6	3	10	0.5%
Hispanic Ethnicity*	-	-	-	-	-
Characteristics by Unit Size					
1 bedroom	68	402	116	586	51.4%
2 bedrooms	48	201	62	311	27.3%
3 bedrooms	25	116	51	192	16.9%
4+ bedrooms	11	26	13	50	4.4%

* No data available

Source: Stark Metropolitan Housing Authority, as of June 2011

Observation

Black households and families with children are overrepresented on SMHA's waiting lists for public housing, compared to their share of all households in Stark County.

Black households comprise 7.2% of all County households and 35.8% of the combined waiting list. Families with children comprise 29.7% of all County households and 49.6% of the waiting list. These facts speak to a disproportionate need among these groups for affordable rental housing.

d. Admissions and Continuing Occupancy Plan (ACOP)

The Admissions and Continued Occupancy Policy (ACOP) defines SMHA's policies for operating the public housing program, incorporating federal, state and local laws. Last revised in August 2010, the policy was originally drafted in 2005 with assistance from Nan McKay and Associates, a consulting firm specializing in HUD's public housing and Section 8 programs.

Chapter 1 of the ACOP includes a collection of general statements regarding SMHA's mission, local objectives, fair housing policy, reasonable accommodation policies, assistance to persons with limited English proficiency and the way in which the Authority markets available units. Among other local objectives, SMHA prioritizes avoiding concentrations of economically and socially deprived families in any one or all of its public housing developments and ensuring compliance with Title VI of the Civil Rights Act of 1964 and all other applicable federal laws and regulations so that admissions and continued occupancy are conducted without regard to race, color, religion, creed, sex, national origin, handicap or familial status. SMHA's fair housing policy goes on to include the additional protected classes of marital status and sexual orientation. Chapter 1 states that SMHA will comply with all of the following laws related to civil rights:

- Title VI of the Civil Rights Act of 1964
- Title VIII of the Civil Rights Act of 1968 (as amended by the Community Development Act of 1974 and the Fair Housing Amendments Act of 1988)
- Executive Order 11063
- Section 504 of the Rehabilitation Act of 1973
- The Age Discrimination Act of 1975
- Title II of the Americans with Disabilities Act (to the extent that it applies, otherwise Section 504 and the Fair Housing Amendments govern)
- Any applicable state laws or local ordinances and any legislation protecting individual rights of tenants, applicants or staff that may subsequently be enacted.

By virtue of the last point, the ACOP provides broad protection consistent with the Ohio Civil Rights Law, which also extends to the bases of ancestry and military status. The only locally established law related to fair housing is the City of Massillon's Fair Housing Code, Chapter 515, which includes the same protected classes as the ACOP, minus marital status and sexual orientation, and does not include ancestry or military status.

Chapter 1 also includes SMHA's general policies on services and accommodations, applicable to all situations described in the ACOP when a family initiates contact with SMHA or when SMHA initiates contact with a family. Among the services and accommodations policies are the following:

- In an effort to provide courteous and efficient service to all applicants for housing assistance, SMHA will endeavor to accommodate persons with disabilities and those with language and literacy barriers.
- All policies and procedures will be designed to provide assurances that all persons with disabilities will be provided reasonable accommodation so that they may fully access and utilize the housing program and related services.
- The availability of specific accommodations will be made known by including notices on forms and letters to all families, and all requests

will be verified so that SMHA can properly accommodate the need presented by the disability.

- Requests for reasonable accommodation will be granted upon verification that they meet the need presented by the disability and do not create an "undue financial and administrative burden" for SMHA, meaning an action requiring significant difficulty or expense.
- Reasonable accommodation will be made for persons with a disability who require an advocate or accessible offices. All PHA mailings will be made available in an accessible format upon request, as a reasonable accommodation.
- SMHA will make accommodations in its application process pertaining to the submission of applications or certification forms via mail, allowing an authorized designee to participate in the process and providing listening devices or interpretation as needed to facilitate the process.
- SMHA partners with organizations that provide assistance for hearing- and sight-impaired persons when needed.
- Families will be offered an accessible unit upon request when an accessible unit is available.
- SMHA will provide readers to assist persons with literacy problems in completing the application and certification process.

In determining whether it is feasible to translate SMHA documents into other languages, the Authority considers the number of limited-English-proficiency families in Stark County who speak the language in question, the estimated cost of translation, an evaluation of the need for translation by staff and agencies that work with non-English-speaking clients, and the availability of local organizations to provide translation services. This is consistent with HUD guidance for compliance with the Civil Rights Act.

In regard to the affirmative marketing of available opportunities, the ACOP specifies that SMHA will publicize and disseminate information on housing units and housing-related services for very-low-income families on a regular basis. SMHA communicates information on housing availability to other service providers in the community so that they can make appropriate referrals.

Observation

SMHA's policies to market available housing opportunities could be expanded to include measures that ensure that information reaches potential tenants within the housing market regardless of race, color, religion, sex, national origin, disability or familial status.

Because one purpose of HUD programs is to provide services designed to affirmatively further the fair housing objectives stated in Title VIII of the Fair Housing Act, the expansion of SMHA's marketing efforts to more comprehensively reach traditionally underserved populations would further fair housing choice. Additional actions to advertise the availability of housing to the population that is less likely to apply could include advertising in targeted media sources, distributing information at churches or community gathering places that serve persons less likely to apply, or conducting special outreach to targeted groups.

SMHA's pet policy, Chapter 10 of the ACOP, places restrictions on the size and type of animals tenants may keep. However, the policy allows for the opportunity for exemption for persons with disabilities who need service or companion animals.

Chapter 2 defines the Authority's admission procedures. Successful applicants must meet five eligibility requirements. They must:

- qualify as a family (the term "family" is defined broadly and inclusively, including single persons as well as various categories of household type)
- include at least one household member who is either a citizen or an eligible non-citizen
- have an annual income that does not exceed HUD's "low" limit
- provide a Social Security number for all family members or demonstrate exemption, and
- meet or exceed the tenant selection and suitability criteria.

SMHA screens all households in interviews, in addition to reviewing application materials, to determine prospective tenants' ability to (among other things):

- pay rent and other charges required by the lease in a timely manner
- care for the unit and common areas
- create no health or safety hazards
- not interfere with the rights and peaceful enjoyment of others
- not to engage in criminal activity or alcohol abuse that threatens the health, safety or right to peaceful enjoyment of other residents and staff
- not to have ever been convicted of manufacturing or producing methamphetamine
- not to contain a household member subject to lifetime sex offender registration under a State registration program, and
- to comply with local health and safety codes.

Applicants will not be rejected due to lack of income or employment, non-participation in a job-training program, refusal to apply for various welfare or benefit programs, familial or marital status or student status.

Chapter 4 of the ACOP establishes waiting list preferences. Each applicant is assigned a place on a jurisdiction-wide waiting list, based on the date of application, the unit type and size required, the community selected by the applicant and factors of local preference. SMHA's local preferences are as follows:

- Families with incomes needed to achieve SMHA's goals of deconcentration of poverty and income-mixing
- Families who live, work or have been hired to work, are attending school or are participating in training programs in the jurisdiction

- Veterans or surviving spouses of veterans
- Families in which the head of household, spouse, co-head or sole member is employed and has been employed for three months (extended automatically to elderly families or those in which the head or spouse meets the HUD definition of disability)
- Families in which the head of household, spouse or co-head has graduated within the last 12 months or is an active participant in a post-secondary educational or training program designed to prepare the individual for the job market.

Families with children, elderly families and families with a disabled member have an admission preference over other singles. In other words, one-person households consisting of a person who is not elderly, disabled, homeless or displaced by government action cannot be selected for assistance before any elderly, disabled, homeless one-person family, regardless of local preferences.

SMHA monitors its admissions to ensure that at least 40% of families admitted to public housing each fiscal year shall have incomes that do not exceed 30% of the area median income. While the Authority does not require any specific income or racial quotas for particular developments or its assistance overall, it has a policy beyond the basic requirement of nondiscrimination to affirmatively further fair housing by reducing racial and national-origin concentrations.

When a unit becomes available, SMHA contacts the first family on the waiting list with the highest priority for the type of unit or development available and whose income category would help to meet the deconcentration goal and/or the income targeting goal. The first qualified applicant in sequence on the selected waiting list will be made up to two offers of a unit of the appropriate size. If the applicant rejects the second offer, the applicant will be removed from the waiting list and may not reapply for one year. Applicants have five business days after an offer is made to accept or reject a unit. Offers made over the telephone will be confirmed by letter. SMHA also makes offers via letter to applicants it cannot reach via phone. An applicant's failure to respond to an offer within 10 working days will result in no further offers.

ii. Section 8 Housing Choice Voucher Program

a. Inventory

In addition to the public housing units SMHA owns and manages, the Authority administers more than 1,500 Housing Choice Vouchers (HCV), all in the form of tenant-based rental assistance. Currently, SMHA's payment standard is 95% of the HUD-determined local fair market rent. In order to expand the living opportunities available to voucher holders, SMHA plans to increase the standard to 100% of fair market value. Demographic characteristics of current voucher holder households were not available for review.

b. Waiting List

As of 2010, SMHA reported 1,703 applicants on the waiting list for Housing Choice Vouchers. The list is currently closed due to a level of demand that has overwhelmed the supply of available vouchers. SMHA policy is to close the waiting list when the estimated waiting period for housing assistance for applicants on the list reaches 36 months for the most current applicants.

However, where SMHA has particular preferences or funding criteria that require a specific category of family, the Authority may elect to continue to accept applications from these applicants while closing the waiting list to others.

Figure 7-4
Characteristics of Households on the HCV Waiting List

	# Families	% of All Families
Total Number of Applicants on Waiting List	**1,703**	**100.0%**
Income		
Extremely Low (<= 30% AMI)	1,373	80.6%
Very Low (>30% but <= 50% AMI)	277	16.3%
Low (>50% but =<80% AMI)	51	3.0%
Family Type		
Families with Children	850	49.9%
Elderly Families	39	2.3%
Families with Disabilities	451	26.5%
Race/Ethnicity		
Black	766	45.0%
White	913	53.6%
Any Other Race	5	0.3%
Hispanic Ethnicity*	-	-

* No data available
Source: Stark Metropolitan Housing Authority

The waiting list consists primarily of households with incomes at or below 30% of the area median income. More than four in five voucher applicants are extremely low income. Roughly one in every four households reported a disability, and half were families with children. Black households comprise 45% of all waiting list households.

Observation

Black households and families with children are overrepresented on SMHA's waiting list for Housing Choice Vouchers, compared to their share of all households in Stark County.

Black households comprise 7.2% of all County households and 45% of the waiting list. Families with children comprise 29.7% of all County households and 49.9% of the waiting list. These facts speak to a disproportionate need among these groups for affordable rental housing.

c. Housing Choice Voucher Administrative Plan

SMHA's policies regarding the Housing Choice Voucher program are outlined in the Authority's Administrative Plan, which includes policies for the operation of various SMHA programs. Among the stated standards of the SMHA in administering all its programs are:

- Achieving high ratings in compliance measurement indicators while maintaining efficiency in program operation to ensure fair and consistent treatment of clients
- Encouraging self-sufficiency of participant families and assisting in the expansion of family opportunities that address educational, socio-economic, recreational and other human services needs
- Promoting fair housing and the opportunity for very low-income families of all ethnic backgrounds to experience freedom of housing choice
- Promoting a market-driven housing program that will help qualified low-income families obtain affordable housing and increase the supply of housing choices for such families.

Chapter 1 contains an overview of the Plan, as well as a list of SMHA's responsibilities in administering the Housing Choice Voucher program. In addition to the standard activities required to maintain the efficient operation of the program, SMHA notes that it is responsible to assist voucher holders in finding places to live as necessary, to conduct outreach to owners with special attention to those outside areas of poverty or minority concentration and to comply with all fair housing and equal opportunity requirements.

Chapter 2 of the Admin Plan includes a fair housing policy in which SMHA states its anti-discrimination policy. The list of protected classes includes race, color, sex, religion, familial status, age, disability or national origin, sexual orientation, veteran status "or any of the other protected classes of the population." Like the ACOP, the Admin Plan also states coverage consistent with any applicable state laws or local ordinances and any legislation protecting individual rights of tenants, applicants or staff.

SMHA's policy relative to reasonable accommodation is set forth in Chapter 2 of the Plan. The Authority asks all applicants and participants if they require any type of accommodation, in writing, on the intake application, reexamination documents, and notices of adverse action by SMHA, by including the following language:

"If you or anyone in your family is a person with disabilities, and you require a specific accommodation in order to fully utilize our programs and services, please contact the housing authority."

In order to be considered as a person with a disability, the applicant or voucher holder must certify that they meet the ADA definition of disability, i.e., a physical or mental impairment that substantially limits one or more of the major life activities, a record of such impairment or being regarded as having such an impairment. The definition of a person with a disability for the purpose of obtaining a reasonable accommodation is much broader than the HUD definition of disability which is used for waiting list preferences and income allowances. SMHA verifies reported disabilities through the use of reliable third-party professionals.

The Admin Plan does not refer in this chapter to raising the payment standard to assist households with a disabled member in locating and securing accessible units, but during the interview process, SMHA representatives mentioned that the Authority would be willing to seek exception rents up to

130% of the prevailing fair market rent for this purpose. This accommodation should be formally added to the reasonable accommodation section of the plan so that voucher applicants and voucher holders are aware that it is available.

Observation

SMHA reported that it would seek exception rents up to 130% FMR if necessary to secure the participation of landlords with units accessible to persons with disabilities. This policy should be added to the "reasonable accommodation" section of the ACOP.

Formalizing this policy will broaden the extent to which it is known about and used by families in need of accessible housing, as appropriate.

Chapter 2 also contains SMHA's policies relative to persons with limited English proficiency, which is different from the policy outlined in the ACOP. SMHA will consider translating documents related to the Housing Choice Voucher program into other languages based on an evaluation of the population in need of translation services, the existing services available and the cost to SMHA of providing translation. The Admin Plan states that SMHA will use the results of the four-factor analysis to determine whether a written Language Access Plan (LAP) is necessary. It is unclear whether the Authority has already conducted the analysis.

In order to be eligible to receive a Housing Choice Voucher, applicants must qualify as a "family." Chapter 4 of the Admin Plan defines "family" broadly and inclusively as a single person or a group of persons consisting of two or more elderly persons or disabled persons living together. "Family" also includes one or more elderly or disabled persons living with one or more live-in aides. At least one member of the family must be a U.S. citizen or have eligible immigration status.

SMHA must conduct outreach as necessary to ensure that the Authority has a sufficient number of applicants on the waiting list to use the HCV resources it has been allotted. The outreach policies in the Admin Plan are more detailed than those outlined in the ACOP, including actions to:

- Analyze the housing market area and the populations currently being served to identify underserved populations
- Ensure that outreach efforts are targeted to media outlets that reach eligible populations that are underrepresented in the program, and
- Avoid outreach efforts that prefer or exclude people who are members of a protected class.

For the purposes of the Housing Choice Voucher program, SMHA has defined local preferences as follows. Generally, all preferences are treated equally.

- Families who are homeless or living in substandard housing, defined as housing that is dilapidated, lacks indoor plumbing, electricity or heat, should but does not have a kitchen or has been declared unfit for habitation by a government agency

- Veterans or servicemen
- Families whose head, spouse or co-head has graduated within the last 12 months or is an active participant in a post-secondary educational or training program designed to prepare the individual for the job market
- Families that claim that they are paying more than 50% of their gross income for rent and utilities
- Families that have a disabled member **and** who receive services provided by any community agency serving persons with mental, physical or cognitive disabilities
- Family Unification Program candidates, including applicants for whom the lack of adequate housing is a primary factor in the imminent placement of the family's child/children in out-of-home care or the delay in the discharge of the child/children to the family from out-of-home care.

SMHA annually reviews its payment standards to determine their appropriateness in the context of the local housing market. The Plan states that SMHA will not raise payment standards solely to make "high end" units available to voucher holders.

Chapter 10 of the Admin Plan establishes SMHA policies on moving among units within the Authority's jurisdiction and porting out to other jurisdictions. The rules in this section are standard, allowing tenants and applicants a maximum amount of choice and flexibility within the guidelines of administrative efficiency.

In Chapter 16 of the Admin Plan, SMHA states its commitment to encouraging the participation of landlords in all areas of Stark County. SMHA has established an official policy of actively recruiting property owners with rental units located outside areas of poverty and minority concentration. This is achieved through outreach to landlords in all areas of the county through distribution of printed material to owners and managers, contacting owners and managers by phone or in person, distributing information at an annual landlord meeting, participating in community-based organizations comprised of owners and managers, and developing working relationships with owners and real estate broker associations.

B. Taxes

Taxes impact housing affordability. While not an impediment to fair housing choice, real estate taxes can impact the choice that households make with regard to where to live. Tax increases can be burdensome to low-income homeowners, and increases are usually passed on to renters through rent increases. Tax rates for specific districts and the assessed value of all properties are the two major calculations used to determine revenues collected by a jurisdiction. Determining a jurisdiction's relative housing affordability, in part, can be accomplished using tax rates.

However, a straight comparison of tax rates to determine whether a property is affordable or unaffordable gives an incomplete and unrealistic picture of property taxes. Local governments with higher property tax rates, for example, may have higher rates because the assessed values of properties in the community are low, resulting in a fairly low tax bill for any given property. In all of the communities surrounding a jurisdiction, comparable rates for various classes of property (residential, commercial, industrial, etc.) are assigned to balance each community's unique set of resources and needs. These factors and others out of the municipality's control must be considered when performing tax rate comparisons.

There are 98 taxing districts in Stark County, with annual tax liabilities ranging from $1,166 in Alliance City-Marlington CSD to $2,006 in Sandy Township-Sandy Valley CSD. Figure (7-5) details the composite rates for the taxing districts in the Cities of Alliance, Canton and Massillon. Tax rates varied considerably. Most of the taxing districts were ranked in the bottom half of the Stark County taxing districts. The highest taxing districts were in the cities of Massillon and Canton, while Alliance had some of the lowest tax rates in the County.

Figure 7-5
Effective Tax Rates by Taxing District, 2009

Municipality	Taxing district	Effective millage rate	2009 taxes for $100,000 home	Ranking among Stark County taxing districts
Alliance City	Alliance CSD	47.068840	$1,441	77
	Marlington CSD	38.084325	$1,166	98
Canton City	Canton CSD	50.718949	$1,553	50
	Plain LSD	47.965593	$1,469	73
	Louisville CSD	41.521255	$1,272	93
	Canton LSD	40.950537	$1,254	94
Massillon City	Massillon CSD	54.871298	$1,680	24
	Jackson LSD	51.326393	$1,572	42
	Fairless LSD	50.421185	$1,544	53
	Perry LSD	47.910241	$1,467	75
	Tuslaw LSD	41.555171	$1,273	92
Median Ohio property tax for $100,000 home: $1,240				

Source: Stark County Auditor's Office

Ohio counties are required by law to reappraise property values every six years, and to update values every third year after revaluation. Stark County is scheduled to reappraise property values in 2012. Ohio's system of revaluation minimizes the potential for unequal taxation policies. In states where there are significant lapses between assessments, tax rates may reflect outdated property values that do not align with actual property values. Therefore, communities that have experienced a rapid loss in property values may be over-taxed, while communities in which property values have increased are under-taxed.

C. Public Transit

Minority and renter households were more likely to be dependent on public transportation in 2000. In Canton and Alliance, renter households were about four times as likely as home owners not to have access to a vehicle; in Massillon renters were almost 10 times as likely to not have a vehicle. In the Urban County, vehicle dependency was lower, but renters were still twice as likely as home owners to not have access to a vehicle.

Figure 7-6
Transit Dependence by Tenure and Race/Ethnicity, 2000

	Urban County	Alliance	Canton	Massillon
Renter households	8.4%	19.1%	28.1%	20.0%
Owner households	4.2%	5.4%	6.9%	2.2%
White	3.5%	9.0%	12.6%	8.3%
Black	5.5%	27.6%	25.8%	19.6%
Asian	6.2%	0.0%	8.2%	0.0%
Two or more races	1.2%	20.2%	23.0%	0.0%
Hispanic	5.5%	18.9%	19.7%	22.4%

Source: U.S. Census Bureau, Census 2000 SF-3 (H44, HCT33A, HCT33B, HCT33D, HCT33G, HCT33H)

Minorities, in particular Blacks and Hispanics, were more likely than White households to not have access to a vehicle, as detailed in Figure 7-6. In the three cities, about 20% of Hispanic households were dependent on public transportation. In Alliance and Canton, over one-quarter of Black households were transit dependent. Only 5.5% of Black and Hispanic households in the Urban County did not have a vehicle, compared to 3.5% of White households.

In 2008, the vast majority of workers drove to work, as detailed in Figure 7-7. The use of public transportation to work was most common in Canton and Massillon, where 3.6% and 3.1% of workers, respectively, took public transportation. In the Urban County, less than 1% of workers utilized public transportation as a means to work.

Observation

Black and Hispanic households were more likely than White households to not have access to a vehicle. Among these minorities in Alliance and Canton, more than one in four households were dependent on public transportation.

Dependence on public transit was much higher among renters than among homeowners across the County.

Figure 7-7
Means of Transportation to Work, 2008

	Urban County	Alliance	Canton	Massillon
Total	100.0%	100.0%	100.0%	100.0%
Car, truck or van	**94.8%**	**91.2%**	**89.1%**	**93.4%**
Drove alone	87.8%	80.1%	76.9%	82.3%
Carpooled	7.0%	11.1%	12.2%	11.0%
Public transportation	**0.4%**	**1.2%**	**3.6%**	**3.1%**
Taxi, motorcycle, bicycle or other means	0.6%	0.4%	1.1%	0.3%
Walked	1.3%	5.4%	3.9%	2.1%
Worked at home	2.9%	1.7%	2.2%	1.0%

Source: 2006-08 American Community Survey (C08301)

Public transportation in the region is provided by the Stark Area Regional Transportation Authority (SARTA). In 2009, total ridership on SARTA's routes was 2,164,137, a 14.5% decreased from 2008. Of the rides provided in 2009, fixed-route ridership accounted for 92.2% and para-transit services accounted for 6.4%.

i. Destinations and Routes

SARTA offers 35 fixed bus routes as well as a Community Coach to link residents of senior housing facilities with major shopping centers. Most routes operate Monday through Saturday; there are no Sunday route services. Routes generally operate from 6 am to 10 pm, and SARTA offers three late-night routes that run until about 1:30 am.

SARTA routes serve primarily the urban centers of Alliance, Canton and Massillon. Additional routes link villages such as Hills and Dale, East Canton, and Meyers Lake to the City of Canton. North Canton also has multiple routes, including one that runs from Canton to the nearby City of Akron. Fixed-route services connect the major residential and shopping areas, as well as employment centers and schools. All of the hospitals and emergency statcare centers in Stark County are also accessible via SARTA's routes. Coverage outside of the urban centers is sparse and runs along the major transportation corridors.

As part of its Transportation Development Plan, SARTA has proposed a number of changes to fixed route services, primarily in the Cities of Alliance, Canton, and Massillon. Included in these plans is a new transit center in Belden Village to better serve the shopping center there and to Kent State.

ii. Accessibility

In accordance with the American with Disabilities Act (ADA), all of SARTA's fixed-route services are accessible to persons with wheelchairs and common scooters. Additionally, SARTA operates Proline, a curb-to-curb para-transit service for person with disabilities who are unable to access fixed-route services. To access Proline, a person must submit an application and renew it regularly. Service may be suspended or denied to persons who do not show up for their designated pick-up time or who cancel their pick-up less than one hour before scheduled.

Proline services are available to all locations within Stark County.

In its 2030 Comprehensive and Transportation Plan, the Stark County Regional Planning Commission (SCRPC) identified four general categories of capital improvement for public transportation in the County. These include:

- Replacing buses and para-transit vehicles that have deteriorated due to age and wear-and-tear;
- Constructing transfer facilities and improving transit stops;
- Improving SARTA's Gateway Facility, which houses SARTA's offices, bus maintenance, and bus storage facilities; and
- Purchasing equipment and engaging in preventative maintenance of SARTA's vehicle fleet and facilities.

SARTA has already begun pursuing some of these goals, including updating its vehicle fleet and constructing a new transit center. In 2010, SARTA also began a transit development plan (TDP) process, an update to its five-year operating and capital. As part of the TDP, SARTA is soliciting public feedback and reviewing its current finances, services, and operations in order to identify potential service changes and capital improvements.

D. Newspaper Advertising

Under federal law the making, printing, and publishing of advertisements that state a preference, limitation, or discrimination on the basis of race, color, religion, sex, handicap, familial status or national origin is prohibited. The prohibition applies to publishers, such as newspapers and directories. The prohibition also applies to persons and entities placing real estate advertisements.

Publishers and advertisers are responsible under federal law for making, printing, or publishing an advertisement that violates the Fair Housing Act in its face. Thus, they should not publish or cause to be published an advertisement that on its face expresses a preference, limitation or discrimination on the basis of race, color, religion, sex, handicap, familial status or national origin. The law, as found in the Fair Housing Amendments Act of 1988, describes the use of words, photographs, symbols or other approaches that are considered discriminatory.

For the AI, reviews were conducted of the online and print real estate listings of three Stark County publications: *The Repository* (all of Stark County, but predominantly Canton), *The Independent* (Massillon) and *The Review* (Alliance). *The Repository* and *The Independent* are sister publications of GateHouse Media, Inc.

For *The Repository* and *The Independent* – which have the same publisher and a number of cross-listed properties – printed housing classified ads for the weekend of June 5-6, 2010, were reviewed as well as the online real estate databases. In the printed classifieds, the publisher's policy on accepting advertisements for the newspaper was prominently displayed and easy to read. The policy statement cited the newspaper's intended compliance with federal, state and municipal fair housing laws, and informed readers that the newspaper would not "knowingly accept any advertising for real estate which is in violation of the law." The notice also includes contact information for the Stark County and the City of Canton fair housing offices.

Only two ads displayed the Equal Housing Opportunity logo, and in one of those ads the logo was so small as to be illegible to a reader who was not looking for it.

In both newspapers, there was an advertisement for a home for sale that described the property as "family ready." Any phrase that suggests a preference for a specific type of tenant is questionable. The rule of thumb when advertising residential real estate for rent or sale is to describe the property, not the people.

The online real estate databases for *The Repository* and *The Independent* have identical interfaces. Neither database includes the publisher's notice, not do any of the ads include the Equal Housing Opportunity logo. The publications' sites allow one to place a real estate ad virtually. In going through the process of placing an ad, the publisher's notice is not included anywhere. Additionally, the online forms suggest ways to catch readers' attention, including using phrases such as "The perfect family house." This type of language may suggest a preference for families that is not in compliance with the Fair Housing Act. Such a stated preference could turn away other household types, such as singles with disabilities.

The printed classified for the weekend of June 5-6, 2010, and the online database for *The Review* were also analyzed. In neither outlet did *The Review* print a publisher's commitment to comply with fair housing laws. There was also no use of the Equal Housing Opportunity logo. However, there was also no questionable language in any of the advertisements for sales or rental housing.

Observation

Preferences for particular family types were detected among the various real estate advertising outlets reviewed for the AI, suggesting that local newspapers could improve their screening processes related to potential housing discrimination.

The rule of thumb when advertising residential real estate for rent or sale is to describe the property being marketed, not the people who should live there.

E. Evidence of Housing Discrimination

This section provides a review of fair housing complaints or compliance reviews where a charge of a finding of discrimination has been made. Additionally, this section will review the existence of any fair housing discrimination suits filed by the United States Department of Justice or private plaintiffs in addition to the identification of other fair housing concerns or problems.

A more in-depth analysis of the housing discrimination complaints filed in each of the four jurisdictions is included in Section 2 of each individual AI; however, a summary of the aggregate data for the region is included below.

i. Complaints filed with HUD FHEO

A lack of filed complaints does not necessarily indicate a lack of housing discrimination. Some persons may not file complaints because they are not aware of how to go about filing a complaint or where to go to file a complaint. In a tight rental market, tenants avoid confrontations with prospective landlords. Discriminatory practices can be subtle and may not be detected by someone who does not have the benefit of comparing his treatment with that of another home seeker. Other times, persons may be aware that they are being discriminated against, but they may not be aware that the discrimination is against the law and that there are legal remedies to address the discrimination. Finally, households may be more interested in achieving their first priority of finding decent housing and may prefer to avoid going through the process of filing a complaint and following through with it. Therefore, education, information, and referral regarding fair housing issues remain critical to equip persons with the ability to reduce impediments.

The Office of Fair Housing and Equal Opportunity (FHEO) at HUD processes complaints from persons regarding alleged violations of the Fair Housing Act. Between March 2005 and November 2010, 66 cases were filed with HUD for all of Stark County. Most complaints were filed by residents of the Urban County, while Alliance had the highest number of complaints per 100,000 residents (calculated using 2010 population), as detailed in Figure 7-8.

Figure 7-8

Bases for Fair Housing Complaints Filed with HUD, 2005-2010

	Total Complaints	Complaints per 100,000	Race	Sex	Color	Disability	National Origin	Religion	Harrassment	Familial Status
Alliance	6	26.7	2	---	1	2	---	---	2	---
Canton	7	9.1	4	---	---	2	---	---	---	1
Urban County	53	21.2	23	3	2	11	2	1	---	20
Stark County Total	**66**	**17.2**	**29**	**3**	**3**	**15**	**2**	**1**	**2**	**21**

Source: U.S. Department of Housing and Urban Development. No complaints were filed in Massillon.

Race was the most commonly alleged basis of discrimination, followed by familial status. Together, discrimination based on race or familial status was alleged in 47 separate complaints, accounting for 71.2% of all complaints. Several complaints alleged more than one basis for discrimination.

Of the 66 cases in the region, 15 (22.7%) were found to be without probable cause and closed. An additional ten cases (15.2%) were withdrawn by the complainant, 18 (27.3%) were successfully conciliated, five (7.6%) were found to be irrelevant to fair housing, and one had passed the statute of limitations. Ten cases are still pending investigation by the Ohio Civil Rights Commission or the Stark County Fair Housing Department.

In seven cases, probable cause was found and the cases are pending trial. In four of the cases, the complainant alleged discrimination on the basis of familial status and in four cases, race was the alleged basis of discrimination. Details on the resolution of complaints for each jurisdiction are included in Figure 7-9.

Figure 7-9

Resolution of Fair Housing Complaints Filed with HUD, 2005-2010

	Total Complaints	No Probable Cause	Complaint Withdrawn	Settled or Conciliated	Irrelevant to Fair Housing or Too Little Substance	Probable Cause Found and Court Date Pending	Statue of Limitation Expired	Pending OCRC Determination	Pending SCFHD Investigation
Alliance	6	1	2	2	---	---	---	---	1
Canton	7	2	---	---	---	1	---	4	---
Urban County	53	12	8	16	5	6	1	1	4
Stark County Total	**66**	**15**	**10**	**18**	**5**	**7**	**1**	**5**	**5**

Source: U.S. Department of Housing and Urban Development. No complaints were filed in Massillon.

ii. Complaints filed with SCRPC

The Stark County Regional Planning Commission (SCRPC) administers fair housing programs that include the receipt and investigation of fair housing complaints across the Urban County and in the City of Alliance. Cases that cannot be dismissed or resolved at the local level are referred to OCRC or HUD. In addition to enforcement duties, SCRPC has a full-time Fair Housing Director and provides counseling on tenant-landlord rights and fair housing laws, sponsors educational workshops and seminars, monitors discrimination compliance and produces fair housing literature.

Between April 2005 and November 2010, a total of 66 cases were filed with SCRPC, 60 of which originated in the Urban County and six of which originated in Alliance. The greatest prevalence of cases occurred in Jackson Township, with 13, and in Plain Township, with 12. Nine cases were reported in Perry Township and in North Canton; seven were reported in Canton Township and fewer than 10 were split among Navarre, Louisville, Lake Township and East Canton.

Similar to complaints filed with HUD, complaints filed with SCRPC most commonly regarded the basis of race, which factored into 29 of 66 total cases. Familial status was the second most common basis for complaint, factoring into 21 cases, followed by disability, which was cited in 15 cases. Complainants may allege discrimination on more than one basis in a single complaint.

Nearly all of the complaints resulted from rental transactions or attempts. All but two cases, 64 of 66 total, cited discrimination or differential treatment in the terms of rental, refusal to rent or false denial that rental housing was available.

Most cases were closed due to lack of probable cause, a complaint withdrawal or administrative reasons. However, 18 cases resulted in settlement or conciliation, and in seven cases a finding of probable cause indicated the presence of unlawful discrimination. All of the probable cause findings are in rental-related cases originating in 2008 and later. Five occurred in Jackson Township, one in North Canton and one in Canton Township. Race was a factor in five of the probable cause findings, and familial status was a factor in four.

Observation

Housing discrimination complaints indicate that unlawful practices still persist, especially in the rental market.

The most common basis of complaint at both the local and federal levels is race, followed by familial status. The prevalence and outcomes of cases suggest that more education, outreach and testing is necessary to inform landlords of their responsibilities under the Fair Housing Act.

F. Regional Fair Housing Observations

This section of the AI is a summary of general observations included in review of regional considerations. General observations include the results of primary and secondary research that define the underlying conditions, trends, and context for fair housing planning across all Stark County jurisdictions. These observations in and of themselves do not necessarily constitute impediments to fair housing choice. Rather, they establish a contextual framework for the impediments to fair housing choice that are presented in the following section of the AI.

i. Demographic and Economic

a. **Black households and families with children are overrepresented on SMHA's waiting lists for public housing and Section 8 vouchers, compared to their share of all households in Stark County.** Black households comprise 7.2% of all County households, 35.8% of the combined waiting list for public housing and 45% of the waiting list for vouchers. Families with children comprise 29.7% of all County households, 49.6% of the waiting list for public housing and 49.9% of those waiting for vouchers. These facts speak to a disproportionate need among these groups for affordable rental housing.

b. **Black and Hispanic households were more likely than White households to not have access to a vehicle.** Dependence on public transit was much higher among renters than among homeowners across the County. This situation can, in turn, restrict housing choice to a limited number of neighborhoods or communities.

G. Potential Regional Impediments and Recommendations

Regional impediments are those barriers that are multi-jurisdictional in nature and that limit fair housing choice for members of the protected classes. The purpose of this section of the AI is to encourage local officials to think and act regionally to overcome impediments that transcend individual HUD entitlement jurisdictions or otherwise offer opportunities to achieve efficiencies in housing production or the delivery of fair housing services.

i. Public Sector

a. **There is an undersupply of public housing units accessible to persons with disabilities.**

SMHA has entered into a voluntary compliance agreement to renovate the public housing inventory to meet minimum federal accessibility standards. As of the writing of this report, there was a deficit of 95 units meeting UFAS standards.

Recommended Action Step: SMHA should proceed to create accessible units in accordance with the voluntary compliance agreement. It is important to remember that UFAS guidelines constitute minimum standards – therefore, the Authority should continue to monitor the need for accessible units and ensure that its inventory adequately serves persons with mobility and sensory disabilities.

b. The Housing Authority's policies could be improved from a fair housing perspective.

SMHA's affirmative marketing policies could be broadened to ensure that information reaches potential tenants within the housing market regardless of race, color, religion, sex, national origin, disability or familial status. Because one purpose of HUD programs is to provide services designed to affirmatively further the fair housing objectives stated in Title VIII of the Fair Housing Act, the expansion of SMHA's marketing efforts to more comprehensively reach traditionally underserved populations would further fair housing choice.

SMHA reported during the development of the AI that it would seek exception rents up to 130% FMR if necessary to secure the participation of landlords with units accessible to persons with disabilities. However, this policy is not stated in the ACOP, which could indicate that voucher holders are unaware that this option is available.

Recommended Action Step: SMHA should add provisions to its affirmative marketing policy with the specific purpose of reaching traditionally underserved persons. Additional actions could include advertising in targeted media sources, distributing information at churches or community gathering places that serve persons less likely to apply, or conducting special outreach to targeted groups.

Recommended Action Step: SMHA should add a statement of policy to the ACOP specifying its willingness to seek exception rents up to 130% FMR on a case-by-case basis to ensure that persons with disabilities are able to locate decent, accessible housing.

c. The volume and outcomes of fair housing complaints filed at both the local and federal levels indicate that unlawful discrimination still occurs in Stark County, especially in the rental market.

Race and familial status were the most common grounds for discrimination complaints at both levels.

Recommended Action Step: The Stark County Regional Planning Commission, along with agencies administering similar programs in Canton and Massillon, should continue to invest in landlord outreach, education and testing in order to broaden understanding of responsibilities under the Fair Housing Act.

d. Preferences for particular family types were detected among the various real estate advertising outlets reviewed for the AI, suggesting that local newspapers could improve their screening processes related to potential housing discrimination.

The rule of thumb when advertising residential real estate for rent or sale is to describe the property being marketed, not the people who should live there.

Recommended Action Step: Participating AI jurisdictions should send a letter to local newspaper publishers to inform them of the AI's findings and remind them of their obligations under the Fair Housing Act.

H. Fair Housing Action Plan

	Planned Action Year					Responsible Entity
	2012	2013	2014	2015	2016	
Expand ways in which the Housing Authority affirmatively furthers fair housing choice						
Proceed to create accessible public housing units in accordance with the voluntary compliance agreement, with UFAS thresholds serving as a minimum. Continue to monitor the need for accessible units and ensure that the inventory adequately serves persons with mobility and sensory disabilities.	•	•	•	•	•	SMHA
Add provisions to the SMHA affirmative marketing policy to reach traditionally underserved persons. Additional actions could include advertising in targeted media sources, distributing information at churches or community gathering places that serve persons less likely to apply, or conducting targeted outreach.	•					SMHA
Add a formal statement to the Admissions and Continued Occupancy Policy that SMHA will seek exception rents of up to 130% FMR on a case-by-case basis to ensure that persons with disabilities can access decent, affordable housing.	•					SMHA
Eliminate instances of housing discrimination across Stark County						
All four entitlement communities should continue to invest in landlord outreach, education and testing in order to broaden understanding of rights and responsibilities under the Fair Housing Act. These actions are potentially most effective executed on a regional basis.	•	•	•	•	•	Alliance, Canton, Massillon, Stark County
Send a letter to local newspaper publishers to inform them of the AI's findings and their obligations under the Fair Housing Act.						SCRPC

Appendix A:

Stakeholders Invited to Participate in the Development of the AI

Appendix B:

Zoning Ordinance Analysis Tables

Village of Brewster

		Comments
Date of ordinance	July 1974	
Updates	Amended occasionally	
Zoning districts and dwelling unit types permitted by right	R1 - single-family R2 - single-family low-density urban R3 - medium-density urban residential: single-family, two-family. Conditionally permits townhouses, row houses, garden apts R4 - multifamily urban residential: all except high-rise apts R5 - mobile home park	Brewster offers a variety of zones and minimum lot sizes that present no potential impediment to the development of affordable housing.
Smallest minimum residential lot size permitted	R1 - 10,000 square feet R2 - 8,000 sf R3 - 12,000 sf (single-family); 12,000 (two-family); 18,000 (multi) R4 - 7,000 sf (single-family); 10,000 (two-family); 12,000 (multi R5 - none defined	
Alternative design	Planned unit development provisions encourage a variety of single- and multi-family dwelling types compatible with the traditional aim of PUDs. Flexibility in requirements allows for innovation and efficiency in neighborhood design.	Village's PUD theoretically expands housing choice by integrating variety of single- and multi-family units.
Definition of family	One or more persons occupying a dwelling unit and living as a single housekeeping unit, whether or not related to each other by birth or marriage, as distinguished from a group occupying a boarding house, lodging house, hotel, tourist dwelling, a sorority, or fraternity. A family may also include servants and gratuitous guests.	This definition is sufficiently broad to meet fair housing standards.
Treatment of group homes	A group home is defined as a residential facility that provides room and board, personal care, habilitation services and supervision in a family setting for at least nine but not more than sixteen persons with developmental disabilities, per state regulations. Conditionally permitted in R-3, R-4, R-5.	Group homes with up to eight residents presumably qualify as single-family households and can locate in any residential district. This meets fair housing standards.

Jackson Township

Date of ordinance	Amended through October 2010	Comments
Zoning districts and dwelling unit types permitted by right	R-R: Rural residential (single-family) R-1: Single-family low-density residential R-1A: Single-family residential R-2: Two-family residential R-3: Residential planned unit development R-4: Multifamily residential R-5: Multifamily high-density residential	Much of the Township is agricultural. Single-family zones dominate residential areas, though multi-family sites can be found throughout. Township surrounds Hills and Dales. Substantial undeveloped areas are planned to be mostly rural residential in future use.
Smallest minimum residential lot size permitted	R-R: 20,000 sf R-1: 14,500 sf R-1A: 12,000 sf R-2: 14,500 sf R-3: N/A; 6 d.u./acre attached, 2.2 d.u./acre detached R-4: Lot min 15,000 sf; Up to 10 d.u./acre (min 4,356 sf per) R-5: Lot min 15,000 sf; Up to 25 d.u./acre (min 1,743 sf per)	
Alternative design	Two different planned unit development districts: R-3 (residential PUD) and R-6 (PUD). R-3 allows for residential uses only in an integrated manner according to an approved overall development plan designed to promote the economical and efficient use of land. More specifically, R-3 PUD Single Family Detached consists of single-family detached units only. R-6 is for projects involving more than 100 acres, to provide for limited commercial uses to meet the needs of proposed residential development	These PUDs are designed to promote efficiency, good design and open space, not to facilitate the integration of affordable housing.
Definition of family	One individual, any number of individuals related by blood, adoption or marriage plus no more than three (3) unrelated individuals, or not more than five (5) unrelated individuals occupying a dwelling unit and living as a single housekeeping unit, but not including groups occupying a hotel or motel.	Definition is sufficiently broad to meet fair housing standards.
Treatment of group homes	A Family Home is defined as a residential facility that provides room and board, personal care, habilitation services and supervision in a family setting for not more than eight "handicapped" persons with physical or mental impairments. The definition of handicapped does not include current illegal use of or addiction to a controlled substance. Permitted by right in all residential districts.	Persons recovering from substance abuse are protected as disabled under the Fair Housing Act, though current users are not.

Louisville

Date of ordinance	2009 (Unified Development Ordinance)	**Comments**
Updates	January 2011	
Zoning districts and dwelling unit types permitted by right	A-1: Agricultural: Single-family dwellings conditionally permitted R-1: Single-family low-density suburban: SF only R-2: Single- and two-family low density suburban R-3: Medium-density urban residential: Adds multifamily conditionally up to 8 d.u./acre, boarding houses PCD: (see below): SF, two-family, multifamily all permitted	Residential zones include land available for development in both low-density and higher-density areas, providing opportunity for affordable housing. Much of R-2 and R-3 located near major travel arteries, amenities. Lot sizes could be potentially prohibitive.
Smallest minimum residential lot size permitted	A-1: 217,800 square feet R-1: 12,000 sf R-2: 10,000 sf (single-family), 15,000 sf (two-family) R-3: 10,000 sf (single-family), 15,000 sf (two-family), multifamily: 18,000 sf for first five units, addit'l 5,000 per each addit'l unit	
Alternative design	PCD: Planned Conservation District. Overlay that encourages conservation of natural features and open space while allowing greater design flexibility in the arrangement and construction of dwelling units and roads.	Provisions do not have intent or effect of expanding housing choice.
Definition of family	No definition specified.	The absence of a definition implies that any group, subject to a structure's occupancy limit, may exist as a single household.
Treatment of group homes	No definition specified; no separate use category encompasses this purpose.	The absence of restrictions on group homes for persons with disabilities means that such a household can be established in any residential district.

Village of Minerva

		Comments
Date of ordinance	1999	
Updates	Amended through October 2010	
Zoning districts and dwelling unit types permitted by right	A-1: Agricultural: Single-family detached R-1: Single-family detached R-2: One- and two-family dwellings R-3: Multifamily: All R-2 uses plus multifamily, boarding R-4: Mobile home park	Minerva offers a variety of zones and minimum lot sizes that present no potential impediment to the development of affordable housing.
Smallest minimum residential lot size permitted	A-1: 20,000 square feet R-1: 7,500 sf (1-1.5 stories); 10,000 sf (2-2.5 stories) R-2: 6,000 sf (1-1.5 stories); 8,000 sf (2-2.5 stories) R-3: 6,000 sf (one family); 6,500 sf (two family); 10,000 sf (multi) R-4: 5,000 sf	
Alternative design	No strategies noted.	
Definition of family	None specified.	The absence of a definition implies that any group, subject to a structure's occupancy limit, may exist as a single household.
Treatment of group homes	No definition specified; no separate use category encompasses this purpose.	The absence of restrictions on group homes for persons with disabilities means that such a household can be established in any residential district.

North Canton

Date of ordinance	1993	Comments
Updates	Amended through July 2010	
Zoning districts and dwelling unit types permitted by right	Single-family: R-70, R-50 Single-family and two-family: R-2F Multifamily: RMF-A, RMF-B Mixed-use overlay allows multifamily up to 24 units/acre Residential care facilities also allowed in park/institutional district	Land zoned residential is primarily single-family (R-70 and R-50). Two-family and multi-family zones more limited, isolated. Minimal amount of available land zoned for multi-family development.
Smallest minimum residential lot size permitted	R-70: 11,200 square feet R-50: 7,200 square feet R-2F: 6,000 square feet (single-family), 5,000 sf (two-family) RMF-A: Max 12 units per acre (min 3,630 sf each) RMF-B: Max 24 units per acre (min 1,815 sf each)	
Alternative design	Mixed-use overlay exists to facilitate creation and maintenance of "town center" area	Has the effect of transit-oriented development
Definition of family	One individual, any number of individuals related by blood, adoption or marriage plus no more than two (2) unrelated individuals; or not more than three (3) unrelated individuals occupying a dwelling unit and living as a single housekeeping unit, but not including groups occupying a hotel or motel as herein defined.	No more than three unrelated persons may live together in a single household. This definition could be updated to accommodate more modern living arrangements.
Treatment of group homes	An Adult Family Home is defined as residence licensed according to Chapter 3722 of the Ohio Revised Code to provide accommodations to not more than 5 unrelated adults and which provides supervision and personal services to at least 3 of those adults, where the adults live as a single housekeeping unit and the residence serves as the adults' sole, bona fide permanent residence.	No more than five unrelated persons with disabilities may live together in a group home. This use must be approved by the Planning Commission in R-70, R-50 and R-2F.

Osnaburg Township

Date of ordinance	1961	Comments
Updates	Map and ordinance revised 2008	
Zoning districts and dwelling unit types permitted by right	R-R Rural residential: single-family R-1 Single-family R-2 One- and two-family R-3 Low-density multifamily: R2 plus townhouses, garden apts R-4 High-density multifamily: two-family, multifamily R-5 Manufactured home/park	Majority of land is zoned R-R or R-1. Development of affordable housing in this area is impeded by large minimum lot size. Multifamily districts comprise only an extremely minimal portion of Township land.
Smallest minimum residential lot size permitted	R-R 43,560 sq ft R-1 20,000 sf without central sewer system, 12,000 sf with R-2 10,000 sf (single-family); 15,000 sf (two-family) R-3 8,000 sf (single); 10,000 (two); 12,000 (multi) R-4 10,000 (two-family); 15,000 (other permitted uses) R-5 6,000 sf	
Alternative design	None specified.	
Definition of family	Persons occupying a dwelling unit and living as a single housekeeping unit.	This definition is sufficiently broad to meet fair housing standards.
Treatment of group homes	A family/group home is defined as a residential facility that provides room and board, personal care, habilitation services, and supervision in a family setting for up to eight persons (family) or least nine but not more than sixteen persons (group) with developmental disabilities. Family homes permitted by right in all residential districts except R-5; group homes have a one-mile buffer.	Ordinance should be amended to specify that such uses also serve persons with physical disabilities.