

Joint Analysis of Impediments to Fair Housing Choice

DRAFT – October 2018

JOINT ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

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CITY OF COLUMBUS, OHIO

Department of Finance and Management
Grants Management Office



FRANKLIN COUNTY, OHIO

Economic Development & Planning Department
Community Development Division



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CHAPTER I.

INTRODUCTION

AFFIRMATIVELY FURTHERING FAIR HOUSING

Equal access to housing choice is crucial to America’s commitment to equality and opportunity for all. Title VIII of the United States Civil Rights Act of 1968, more commonly known as the Fair Housing Act, provides housing opportunity protection by prohibiting discrimination in the sale or rental of housing on the basis of race, color, religion, sex, and national origin. The Act was amended in 1988 to provide stiffer penalties, establish an administrative enforcement mechanism and to expand its coverage to prohibit discrimination on the basis of familial status and disability. The U.S. Department of Housing and Urban Development (HUD), specifically HUD’s Office of Fair Housing and Equal Opportunity (FHEO), is responsible for the administration and enforcement of the Fair Housing Act and other civil rights laws.

Provisions to affirmatively further fair housing (AFFH) are basic long-standing components of HUD’s housing and community development programs. The AFFH requirements are derived from Section 808(e) (5) of the Fair Housing Act which requires the Secretary of HUD to administer the Department’s housing and urban development programs in a manner to affirmatively further fair housing.¹

In 2015, HUD published a final rule on Affirmatively Furthering Fair Housing, which outlines procedures that jurisdictions and public housing authorities who participate in HUD programs must take to promote access to fair housing and equal opportunity. This rule stipulates that grantees and housing authorities take meaningful actions to overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected class characteristics. Under HUD’s final rule, grantees must take actions to:

- Address disparities in housing need;
- Replace segregated living patterns with integrated and balanced living patterns;
- Transform racially and ethnically concentrated areas of poverty into areas of opportunity; and
- Foster and maintain compliance with civil rights and fair housing laws.

To assist grantees and housing authorities affirmatively further fair housing, HUD provides publicly-available data, maps, and an assessment tool to use to evaluate the state of fair housing within their communities and set locally-determined priorities and goals. HUD’s final rule mandated that most grantees begin submitting to HUD an assessment developed using these tools in 2017; however, a 2018 HUD notice extended that deadline until at least October 2020. The notice further required that grantees instead prepare and keep on file a current “Analysis of Impediments to Fair Housing Choice” (AI).

In an AI, local communities that receive HUD entitlement grant funds evaluate barriers to fair housing choice and develop and implement strategies and actions to overcome any identified impediments based

¹ U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity. *Fair Housing Planning Guide: Volume 1 (Chapter 1: Fair Housing Planning Historical Overview, Page 13)*. March 1996.

on their individual histories, circumstances, and experiences. Through this process, local entitlement communities promote fair housing choices for all persons, including classes protected under the Fair Housing Act, and provide opportunities for racially and ethnically inclusive patterns of housing occupancy, identify structural and systemic barriers to fair housing choice, and promote housing that is physically accessible and usable by persons with disabilities.

HUD will presume that the grantee is meeting its obligation and certification to affirmatively further fair housing by taking actions that address the impediments, including:

- Analyzing and eliminating housing discrimination within the jurisdiction;
- Promoting fair housing choice for all persons;
- Providing opportunities for racially and ethnically inclusive patterns of housing occupancy;
- Promoting housing that is physically accessible to all persons to include those persons with disabilities; and
- Fostering compliance with the nondiscrimination provisions of the Fair Housing Act.

Through its Community Planning and Development (CPD) programs, HUD's goal is to expand mobility and widen a person's freedom of choice. The Department also requires Community Development Block Grant (CDBG) program grantees to document AFFH actions in the annual performance reports that are submitted to HUD.

Mosaic Community Planning assisted the City of Columbus and Franklin County with the preparation of this Analysis of Impediments to Fair Housing Choice. This AI follows the requirements in HUD's *Fair Housing Planning Guide* but is also compliant with the regulations and assessment tool established in HUD's 2015 final rule. In several chapters, it incorporates the maps and data developed by HUD for use by grantees as part of the Affirmatively Furthering Fair Housing final rule.

DEFINITIONS

Affirmatively Further Fair Housing – In keeping with the latest proposed guidance from HUD, to Affirmatively Further Fair Housing Choice (AFFH) is to comply with “the 1968 Fair Housing Act’s obligation for state and local governments to improve and achieve more meaningful outcomes from fair housing policies, so that every American has the right to fair housing, regardless of their race, color, national origin, religion, sex, disability or familial status.”²

Fair Housing Choice - In carrying out this Analysis of Impediments to Fair Housing Choice, the City of Columbus used the following definition of “Fair Housing Choice”:

- The ability of persons of similar income levels to have available to them the same housing choices regardless of race, color, religion, sex, national origin, familial status, or handicap.

² U.S. Department of Housing and Urban Development. “HUD Publishes New Proposed Rule on Affirmatively Furthering Fair Housing Choice.” Press Release No. 13-110. July 19, 2013.

Impediments to Fair Housing Choice - As adapted from the HUD *Fair Housing Planning Guide*, impediments to fair housing choice are understood to include:³

- Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin which restrict housing choices or the availability of housing choices.
- Any actions, omissions, or decisions which 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.

Protected Classes – The following definition of federally protected classes is used in this document:

- Title VIII of the Civil Rights Act of 1968 prohibits housing discrimination based on race, color, national origin or ancestry, sex, or religion. The 1988 Fair Housing Amendments Act added familial status and mental and physical handicap as protected classes.

Affordable – Though local definitions of the term may vary, the definition used throughout this analysis is congruent with HUD’s definition:

- HUD defines as "affordable" housing that costs no more than 30% of a household's total monthly gross income. For rental housing, the 30% amount would be inclusive of any tenant-paid utility costs.
- For homeowners, the 30% amount would include the mortgage payment, property taxes, homeowners insurance, and any homeowners’ association fees.

DATA SOURCES

Decennial Census Data – Data collected by the Decennial Census for 2010 and 2000 is used in this Assessment (older Census data is only used in conjunction with more recent data in order to illustrate trends). The Decennial Census data is used by the U.S. Census Bureau to create several different datasets:

- 2010 and 2000 Census Summary File 1 (SF 1) – This dataset contains what is known as “100% data,” meaning that it contains the data collected from every household that participated in the Census and is not based on a representative sample of the population. Though this dataset is very broad in terms of coverage of the total population, it is limited in the depth of the information collected. Basic characteristics such as age, sex, and race are collected, but not more detailed information such as disability status, occupation, and income. The statistics are available for a variety of geographic levels with most tables obtainable down to the census tract or block group level.
- 2000 Census Summary File 3 (SF 3) – Containing sample data from approximately one in every six U.S. households, this dataset is compiled from respondents who received the “long form” Census

³ U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity. *Fair Housing Planning Guide: Volume 1 (Chapter 2: Preparing for Fair Housing Planning, Page 2-17)*. March 1996.

survey. This comprehensive and highly detailed dataset contains information on such topics as ancestry, level of education, occupation, commute time to work, and home value. The SF 3 dataset was discontinued for the 2010 Census, but many of the variables from SF 3 are included in the American Community Survey.

American Community Survey (ACS) – The American Community Survey is an ongoing statistical survey that samples a small percentage of the U.S. population every year, thus providing communities with more current population and housing data throughout the 10 years between censuses. This approach trades the accuracy of the Decennial Census Data for the relative immediacy of continuously polled data from every year. ACS data is compiled from an annual sample of approximately 3 million addresses rather than an actual count (like the Decennial Census’s SF 1 data) and therefore is susceptible to sampling errors. This data is released in two different formats: single-year estimates and multi-year estimates.

- ACS Multi-Year Estimates – More current than Census 2010 data, this dataset is one of the most frequently used. Because sampling error is reduced when estimates are collected over a longer period of time, 5-year estimates will be more accurate (but less recent) than 3-year estimates. ACS datasets are published for geographic areas with populations of 20,000 or greater. The 2012-2016 ACS 5-year estimates are used most often in this assessment.

CHAPTER 2.

COMMUNITY PARTICIPATION PROCESS

COMMUNITY ENGAGEMENT OVERVIEW

An important component of the research process for this Analysis of Impediments to Fair Housing Choice involved gathering input regarding fair and affordable housing conditions, perceptions, and needs in Columbus and Franklin County. The City and County used a variety of approaches to achieve meaningful public engagement with residents and other stakeholders, including public meetings, a focus group, interviews, and a communitywide survey.

Public Meetings

Two meetings open to the general public were held to inform the public about and gather information for the Analysis of Impediments to Fair Housing Choice. Each meeting began with a short presentation providing an overview of the AI, related fair housing law, how to access HUD-provided fair housing data, and ways to provide input for the study. The remainder of the meetings consisted of an interactive discussion of fair housing, neighborhood conditions, and community resources in Columbus and Franklin County. A total of eight members of the public attended the two meetings. Meeting dates, times, and locations are shown below:

Public Meeting #1

Tuesday, July 24, 2018
6:00 PM
Milo Grogan Community Center
862 E. 2nd Avenue, Columbus, OH 43201

Public Meeting #2

Thursday, July 26, 2018
6:00 PM
Hilliard Branch Library, The Hilliard Room
4500 Hickory Chase Way, Hilliard, OH 43026

Focus Group

In addition to the public meeting, a focus group was held on the Wednesday, July 25 at 1:00 PM at Ethiopian Tewahedo Social Service's (ETSS's) west location at Hollywood Plaza, 4107 West Broad Street, Columbus, OH 43228. ETSS is a nonprofit organization dedicated to helping new arrivals from other countries gain self-sufficiency in Columbus, and provides employment assistance, English language classes, afterschool and summer programs, and advocacy for victims of domestic violence. Fourteen ETSS clients and staff members participated in the focus group. Like the public meeting, it began with an explanation of the Analysis of Impediments to Fair Housing Choice and related fair housing law. The focus group leader then facilitated a discussion of fair and affordable housing needs, neighborhood conditions, and community resources in Columbus and Franklin County. ETSS staff provided language interpretation service for clients as needed.

Stakeholder Interviews

During the week of July 23, 2018, individual and small group stakeholder interviews were held in downtown Columbus adjacent to City Hall. For people unable to attend an in-person interview, telephone interviews were offered. Stakeholders were identified by the City of Columbus Grants Management Office and the Franklin County Community Development Division, and represented a variety of viewpoints including fair housing/legal advocacy, housing, affordable housing, community development and planning, education, employment, homelessness, people with disabilities, seniors, LGBTQ persons, and others.

Interview invitations were made by email and/or phone to more than 40 stakeholders. XX people participated in an interview, and several invitees participated in other manners, such as by attending the public meeting, hosting a focus group, or taking the community survey. Organizations from which one or more representatives participated in the development of this AI include:

- Affordable Housing Trust
- Central Ohio Community Improvement Corporation
- City of Columbus City Council
- City of Columbus Department of Education
- City of Columbus Planning Division
- City of Columbus Housing Division
- Columbus Metropolitan Housing Authority
- Columbus Urban League
- Community Shelter Board
- Disability Rights Ohio
- Ethiopian Tewahedo Social Services
- Franklin County ADAMH Board
- Franklin County Board of Commissioners
- Franklin County Administration
- Franklin County Economic Development & Planning Department
- Franklin County Office of Aging
- Gertrude Wood Community Foundation
- Homeport
- Legal Aid Society of Columbus
- Mid-Ohio Regional Planning Commission
- Ohio State University
- Stonewall Columbus
- Wagenbrenner Development
- Weiler Realty
- Workforce Development Board of Central Ohio

Community Survey

The fourth method for obtaining community input was a 26-question survey available to the general public, including people living or working in Columbus and Franklin County, and other stakeholders. The survey was available online and in hard copy during July and August 2018. Paper copies were available at the public meetings and at several public libraries in Columbus and Franklin County. A total of 71 survey responses were received.

Public Comment Period and Hearing

The City of Columbus and Franklin County will hold a 30-day public comment period and public hearings to receive input on the draft Analysis of Impediments in October and November 2018. Further information about the comment period, including any public comments received, will be included here in the final draft of this document.

Publicity for Community Engagement Activities

A variety of approaches were used to advertise the AI planning process and related participation opportunities to as broad an audience as possible. Notice was given to residents through a public notice in the *Columbus Dispatch*, on the City of Columbus Grants Management Division website, through a press release to local news outlets, and through flyers placed in public places. Flyers were also emailed to all stakeholder organizations invited to participate in interviews, as well as about 100 media contacts of the Franklin County Community Development Division. In all meeting advertisements, information for anyone needing special accommodations (including translation, interpretation, and services for people with disabilities) was provided, but none were requested.

A separate flyer regarding the focus group was provided to ETSS to advertise the meeting to their clients.

COMMUNITY ENGAGEMENT RESULTS

A total of 117 people participated in the community engagement process used to develop this AI. Twenty-four participated in interviews, 22 attended a public meeting or focus group, and 71 responded to the survey.

For the community participation process, the consulting team developed a standard question set for use in public meetings, focus groups, and interviews. Listed below are the summarized comments from interview participants and meeting/focus group attendees, as well as a summary of survey results. All input was considered in development of this AI, and no comments or surveys were not accepted. Note that these comments do not necessarily reflect the views of the City of Columbus or Franklin County.

Public Meetings and Focus Group

1. What are the greatest fair housing needs in the community? Are there parts of the city or county that are particularly affected?
 - Landlords take advantage of people who don't have a lot of housing options or have language barriers. For example: discrepancies between what a lease says and what a landlord actually charges, discrepancy between who is paying for utilities and what those costs are, landlords trying to charge tenants to leave even if the lease is up, not getting deposits back, paying rent twice when management turns over, lack of maintenance and pest control.
 - Language and cultural barriers for New Americans.
 - Safety, crime, and vandalism are issues. There have been ongoing safety and discrimination issues in their communities that the City is aware of but no action has been taken.
 - Landlords aren't held accountable for basic maintenance of housing units; have turned to the City to request help in some cases.
 - When property owners realize people are interested in living in the area, rents go up.
 - Issues are common in many low-income areas and apartment communities where refugees live.

2. What parts of Columbus and Franklin County are generally seen as areas of opportunity? What makes them attractive places to live? What barriers might someone face in moving to one of these high opportunity areas?
 - Hilliard – it’s peaceful, has good schools, and is close by the highway.
 - Bexley – workforce participation, good schools, recreation and greenspace.
 - Whitehall – access to grocery stores and shopping.
 - Grandview and Upper Arlington – good schools.
 - This neighborhood (around ETSS West Location) is good but it needs some areas where kids can be active (gym, park, safe kids activities).
 - Other than the Short North, people don’t really say they want to live in Columbus.
 - Main concern is children being safe and in good schools.
 - Not many locations that have housing for people with low incomes; the places where you’re able to get in are often not safe.
 - Most people live in the area where they work, but wages are low relative to the work, and not enough to afford somewhere to live.
 - Focus group participants are not generally aware of many neighborhoods or areas in the county because they have not lived in Columbus long.
 - These areas are expensive and they’re not diverse.
 - Availability of transportation and rental housing would need to be available.
 - Long Section 8 waiting lists and then it’s hard to find a place that will accept Section 8 voucher; some people have started applying in other cities.
 - Generally hard to obtain housing because there’s not a lot of availability; Section 8 housing is at capacity and for-sale units go very quickly.
3. Do residents of similar incomes generally have the same range of housing options? Are there any barriers other than income/savings that might impact housing choices?
 - May be limited to places that accept Section 8.
 - Section 8 should provide a list of landlords that will accept vouchers, so people don’t have to use resources to overcome language, transportation, and employment barriers to search for housing. New Americans don’t know their way around the city so may need assistance to search for a place to live.
4. Are you aware of any housing discrimination? What are some things that can be done to overcome discrimination?
 - Realtors will express preferences for certain neighborhoods without many Black people, claiming these areas are better for resale.
 - When looking for rental property, it was common to see “No Section 8” signs.

5. Are people in the area segregated in where they live? What causes this segregation to occur?
 - There are people of certain ethnicities populated in some areas. For example: people of Middle Eastern descent in Dublin and Hilliard, Latin Americans and Somalis on the west side of Columbus, and Eritreans and Ethiopians on the east side.
 - Immigrant communities are segregated.
 - Segregated areas may have their reasons for being segregated – they may not be so bad.
 - People with disabilities seem pretty well integrated into the community.
 - Columbus is segregated, but Cleveland and Cincinnati are worse.

6. Is there an adequate supply of housing that is accessible to people with disabilities?
 - The Urban League once provided a list of only about 20 accessible units in all of Columbus that would take a voucher.
 - Finding housing for elderly and disabled residents is very difficult. Senior apartments all say they have wait lists of 1-3 years.
 - Older adults don't increase their incomes and move out to market rate units – once they get into housing, they stay where they are until they need a nursing home.
 - NIMBYs say to put all the affordable senior housing out in the county.

7. What types of fair housing services (education, complaint investigation, testing, etc.) are offered in the area? How well are they coordinated with the work of other organizations in the community?
 - Hands on Central Ohio and 211 are both good resources
 - The Columbus Urban League
 - Legal Aid
 - ETSS is a resource for housing issues; there have been a few cases where Legal Aid has been hired.
 - The immigrant and refugee communities don't know their fair housing rights but would like to; they don't see anyone taking the lead on fair housing education and enforcement. They need clear information on where to go if they have a housing issue and what actions will be taken.
 - Often feel that they can't complain because landlords may retaliate, or it will be viewed as bringing outside authorities into their communities.

8. Are public resources (e.g., parks, schools, roads, police and fire services, etc.) available evenly throughout all neighborhoods?
 - Schools in the areas where they live are good, but not the best.
 - The Short North is getting lots of help – it doesn't need it anymore.
 - Franklinton could use more public investment.
 - The squeaky wheel gets the grease. Marginalized people can get it too, but they have to organize to get their voices heard.
 - Need for more sidewalks in the area.
 - Columbus is working on improving transit, but more bus routes would be helpful.

9. Is there anything we haven't discussed that you feel is important to our research?
- It's difficult for many refugees to move to a better house even if they have a job that pays enough to do so. Ohio is an at-will employment state and they could be let go from their jobs and then wouldn't be able to afford the higher rent, so they feel more comfortable staying in lower-cost housing.
 - An eviction on your record makes it really difficult to find housing.
 - Some landlords require 60-day notice before vacating, but who can afford to pay rent for 2 months on a second apartment just to hold it?
 - More companies are moving here, but wages still aren't good. Also, it's difficult for immigrants and refugees to obtain employment other than through an employment agency; companies use them because they don't want to deal with the paperwork of hiring people who aren't citizens.
 - Most people are just trying to get through their day – even Neighborhood Watch participation is too much to ask. Are they supposed to find childcare in order to go to Council and speak out on an issue?
 - Meeting attendees would like to see what comes out of this study. Will there be improvement on these issues?

Stakeholder Interviews

1. What are the greatest fair housing needs in the community? Are there parts of the city or county that are particularly affected?
- Housing wage continues to grow and is currently \$17 an hour; there are three households at that income level for every affordable housing unit.
 - Rents are skyrocketing.
 - Landlords being able to opt out of accepting Section 8 vouchers is a big issue.
 - Short North and other central city neighborhoods have seen rents and home prices rise as revitalization occurs; while there may not be direct displacement, there is concern this is impacting renters.
 - Revitalization needs to include a mix of incomes; tax abatements are a tool in some neighborhoods.
 - County will be short about 50,000 housing units according to growth projections.
 - There's been a high amount of growth, which impacts housing affordability. New housing is now about \$275,000, which is a hard price point for young families to afford.
 - In addition to housing costs, households in some neighborhoods face high energy burdens (ex: Franklinton, Linden, Milo Grogan).
 - Credit histories impact people's ability to access housing; losing one home essentially bars them from finding other housing because it hurts their credit and/or rental history.
 - Requirements for developing affordable housing using various programs can be high (ex: energy efficiency, specific building materials, etc.) which makes it more difficult and expensive to do
 - Evictions are high and evicting someone is a short process in Ohio.
 - Housing discrimination against immigrant populations (ex: being told to pay additional rent, unjust evictions, etc.). These groups are particularly vulnerable because they may not have many other housing options.

- There may be language and cultural barriers immigrants that impact access to affordable housing and knowledge of available housing programs.
 - Housing discrimination against families with children (ex: issues regarding noise, steering away from second story apartments).
 - For people on Supplemental Security Income (SSI) or Social Security Disability Income (SSDI), housing is very hard to afford; they depend on HUD vouchers and it can be hard to find a landlord who will accept a voucher.
 - There is an overrepresentation of Black, youth, and LGBTQ populations in the homeless population.
 - The effects of structural racism and redlining are still there, although the Mayor has made efforts in this area, including related to infant mortality.
 - Many parts of unincorporated Franklin County are low density with no water/sewer so opportunities for multifamily housing is limited. Some townships may have capacity for higher density development, but it's not supported by residents.
 - Key elements that should be connected are affordable housing, transit, and job centers; there has been recent regional planning efforts for corridors with capability for high-capacity transit.
2. What parts of Columbus and Franklin County are generally seen as areas of opportunity? What makes them attractive places to live? What barriers might someone face in moving to one of these high opportunity areas?
- South side of Columbus, around Reeb Center, because of access to healthy food, job training, and childcare.
 - Franklinton, because of redevelopment activity and focus on the arts; there is concern that people will be priced out.
 - North Linden, Hilltop, and South Central are three neighborhoods where you can still get housing on a working class salary.
 - Clintonville, because it has good public schools, is served by bus, and has good access to jobs.
 - North East, because of good access to Eastern Shopping Center and light industrial jobs.
 - Dublin and New Albany, but if you live in the suburbs, access to jobs is a problem. There are some COTA routes out into the suburbs, but the last-mile connections are not easy.
 - Worthington and Westerville, but access to jobs would be a barrier because these areas aren't on a bus line.
 - Whitehall – inner ring suburb with modest, workforce housing.
 - Near East, Near North, Southside, Hilltop are areas you may be able to afford housing. Areas that may be more desirable to live are Far East Side, Far West Side, Short North, Dublin, Hilliard, Pickerington, Worthington, and Westerville. Schools are generally good, but transit access would be an issue, especially depending on where you work.
 - For a young person looking to buy a home, Grove City. Hilliard and Dublin have downtowns and are somewhat affordable. Housing inside the 270 Loop is expensive.
 - Areas like Clintonville, Grandview, and Upper Arlington are good neighborhoods, but you may have to compromise a lot of what you're looking for to afford a house there.
 - Areas with good jobs and a wealth of resources are often lacking affordable housing. NIMBY attitudes in the suburbs can be a barrier to affordable, multifamily development there.

- It depends on what you're looking for. Some people are attracted to urban settings and want to be downtown; others want more space and look for suburban housing.
 - In the county, Jefferson and Brown Township attract a lot of large-lot single-family development. Hilliard is popular and has some medium-density single-family development. People are attracted to rural areas because they are quiet, peaceful, offer larger lots, and a different aesthetic than the city.
 - Suburban areas have a lot of opportunity, but transit is limited and there is not much multifamily housing.
 - Cost is typically the biggest barrier someone faces when they move; transportation would also be a barrier for someone relying on transit.
 - Affordable housing development should be along transit lines.
 - Access to transit could be a barrier to living in more rural areas; a car would be needed for areas that are very far out.
 - Even if transit is available, sidewalks/first and last mile connections, transfers, and winter impact people's ability to use transit to travel between home and work.
 - Being near work, childcare, afterschool care, and support systems are important as people decide where to live.
 - A family with a car would choose the suburbs. Older adults like Clintonville and German Village because they're central and on bus lines.
 - Generally, areas with higher per capita income and higher levels of education offer opportunity.
 - School districts are a big driver for housing choices; Columbus city schools are not considered as bad as in some cities, but generally suburban school districts are preferred.
 - City is trying to develop neighborhoods but schools may be a barrier for some people to move to the city.
 - Efforts to create mixed-income communities often don't reach lowest income levels and homeless people.
3. Do residents of similar incomes generally have the same range of housing options? Are there any barriers other than income/savings that might impact housing choices?
- Not sure; people make residential choices based on schools, proximity to family, access to the community organizations they rely on.
 - It depends on the person (landlord, real estate agent, etc.) that you're dealing with. Real estate agents may steer buyers to specific areas.
 - Yes, but people are often looking for different options based on their wants and needs.
 - As long as cost isn't a factor, their options should be the same; hasn't personally heard about housing discrimination but it may happen.
 - Most neighborhoods have some level of diversity, but someone still may feel intimidated or uncomfortable to move to an area if they will be in the minority there.
 - People will have different options – there are implicit biases and judgements that affect where buyers are taken.
 - They wouldn't necessarily have different options, but people do have implicit biases that may impact access to housing.

- Some immigrants and refugees tend to live with or near extended family or near religious or cultural centers, which often have a side organization that provides assistance.
 - Housing options are impacted by race and whether or not you have kids.
 - African Americans are evicted at higher rates; a recent pilot project is underway to work with a few apartment complexes to assist people if they get behind on rent in an effort to prevent evictions.
 - Knowledge about housing options would impact someone's choice; households have to have information about a variety of areas they could move into.
 - No, there would not be any difference in options.
4. Are you aware of any housing discrimination? What are some things that can be done to overcome discrimination?
- Yes, discrimination on the bases of familial status, ethnicity, and sexual orientation.
 - May be issues regarding accommodations for people with disabilities, particularly around support animals or home modifications.
 - Discrimination based on disability status is frequent: requests for reasonable accommodation, service animals, and designated parking spaces will all tend to receive pushback from landlords.
 - Discrimination against people with disabilities related to mental health or substance abuse is common; landlords may not want to deal with the symptoms of their disabilities.
 - Landlords can discriminate in underhanded ways, such as being subjective with leasing activity based on protected class.
 - Apartment complexes with well-trained staff may be better than private landlords who either do not know or do not follow fair housing law.
 - Discrimination looks like this: a segregated city due to redlining, inability to get loans, flight of grocery stores, and needing new investment to correct the sins of the past.
 - Discrimination may happen, but it's rare. Columbus is an economic town – it all comes down to someone's ability to pay the rent.
 - Families of color are less often approved for home loans.
 - Women of color and single heads of households experience eviction more often.
5. Are people in the area segregated in where they live? What causes this segregation to occur?
- Columbus is the top one or two city in the country in terms of economic segregation.
 - Pretty segregated – Near North was historically redlined. Near East, northeast, and the south side of the city have more African American population. West side, Clintonville, and the suburbs have more white residents. Latinos tend to live on the west side or in the northwest.
 - There are some areas that are diverse, but also some areas where African Americans and New Americans make up small shares of the population (west side, north side, suburban areas), although there are some emerging populations of New Americans in the suburbs.
 - Bexley has a high Jewish population; has a very good school district.
 - Rural areas in Franklin County tend to be homogenous and also not as affordable.
 - City and urban areas in the County are more diverse, with mix of white, Latino, Somali, African American and other populations.

- There have been historical patterns of segregation and redlining.
- There is a political will to not be a segregated city.
- Columbus embraces diversity. To a lot of people, diversity is important as they're choosing where to live.
- Columbus has experienced massive middle class white flight, leaving behind an African American school system in a predominantly white city and county.
- Culturally, immigrants tend to cluster in certain communities. This is how they become established and build wealth.
- Freeways, redlining, and housing policy have led to segregation and the isolation of communities – this was intentional.

6. Is there an adequate supply of housing that is accessible to people with disabilities?

- It's challenging to find first-level, accessible residences; making modifications or finding a suitable home would be difficult if you're not wealthy.
- Strong demand for senior, single-level housing, which can be expensive.
- Continuing need for ramps, home improvements, retrofitting, etc. that is likely to continue as the population ages. There is probably a deficit now, with many people "making do" in homes that are not truly accessible.
- Ramps are a possibility for people who want to stay in their neighborhood but have limited options for accessible housing.
- There are not enough accessible units, and those that are accessible have waiting lists. People may not bother to apply since wait list is so long.
- Knowing about and being able to access available resources may also be an issue for people with disabilities.
- The County funds a lot of agencies that serve seniors and people with disabilities.
- Multifamily developments are built to meet federal requirements regarding accessibility; sometimes accessible units aren't filled by someone with a disability. Do people know they're available? Is there an interest in living in these units?
- There is almost always some neighborhood pushback against development of housing for people with mental health or substance abuse issues; good neighbor agreements help.

7. What types of fair housing services (education, complaint investigation, testing, etc.) are offered in the area? How well are they coordinated with the work of other organizations in the community?

- Columbus Urban League – does fair housing education, landlord education, pre-purchase counseling, review leases with client, have done housing discrimination testing.
- Homeport.
- Disability Rights Ohio – litigates class action suits.
- Community Development for All People.
- Reeb Center.
- Ohio Civil Rights Commission – takes referrals, but people complain that they don't do much with them.
- Legal Aid – pretty active and well-connected.

- City's Housing Division.
 - Central Ohio Fair Housing.
 - Mid-Ohio Regional Planning Commission.
 - Columbus Metropolitan Housing Authority.
 - Housing Alliance.
 - Settlement House does a lot of work regarding tenant education.
 - Community mediation at the courthouse.
 - County building inspector may make referrals for wraparound services for residents if needed.
 - Information and education about fair and affordable housing may be beneficial to township staff and leaders.
 - Zoning code or other ordinance violations could be reported to the City prosecutor.
 - We don't have a fair housing organization like we should. Toledo and Cincinnati have good ones.
 - Trade associations, like the Realtors and Apartment Associations, do civil rights training that is well-attended.
 - There's a need for more education and enforcement, more testing and litigation.
 - A lot of these organizations' fair housing services are known to other social service agencies or affordable housing providers but not to the general public.
8. Are public resources (e.g., parks, schools, roads, police & fire services, etc.) available evenly throughout all neighborhoods?
- Distribution seems pretty fair.
 - Police have always seemed responsive and available.
 - In more diverse neighborhoods, response time is lower for a higher number of emergency complaints.
 - Schools depend on the neighborhood and how it's doing economically.
 - Generally there is a preference for suburban school districts.
 - City has done and is doing a lot of works on parks and greenspace.
 - Parks and rec does a great job with rec centers.
 - Some variation in distribution of parks given how development occurred.
 - Bike paths and trails are important, especially to low-income residents.
 - There is a lot of open space per capita in Franklin County but it's not evenly distributed.
 - There is variation in shopping and services available; in areas that are predominately Black, selection is often more limited than in other parts of the city and county.
 - There is definitely a difference in food access. The grocery store on Cleveland Avenue recently closed, leaving Linden neighborhood without a major grocer. There, and in other neighborhoods, transportation is the key to being able to access a store.
 - Access to local food/local farmers market is important. Some areas get more infrastructure and investment because they need it more.
 - There's not enough to go around and investment is uneven because some neighborhoods can't advocate for themselves.
 - Some service levels vary by township depending on how much tax revenue they have and how well they may be able to use ODOT money. Rural areas may have less access to services due to being so far out.

9. Is there anything we haven't discussed that you feel is important to our research?
- There is an urgent need for more affordable housing development.
 - There is a gap in availability of housing for people in the 80-120% Area Median Income (AMI) range.
 - Utility costs when you're building are the same across the board regardless of housing price; inhibits affordability for lower-priced housing.
 - You run into lots of NIMBYism in Columbus because people are very protective of their school districts.
 - As Columbus is growing, now is the time to require low-income housing. In high demand areas, developers should have to commit to affordable housing in order to get any kind of incentives.
 - Zoning is very restrictive in the suburbs; less so in Columbus.
 - Failure to understand mental illness leads to eviction, and anyone facing eviction stands not to lose just his or her housing, but also the voucher.

Community Survey

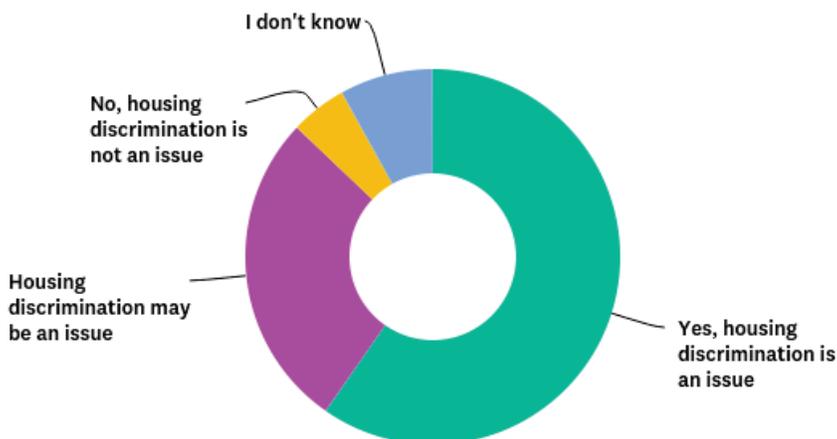
Seventy-one people participated in the community survey, which queried respondents about housing needs, their neighborhood, access to community resources, knowledge of fair housing rights, housing discrimination, and housing barriers. The following includes a sample of questions and responses from the community survey. Complete results are provided as an appendix to this report.

Participant Demographics

- Most participants (61%) live in the city of Columbus. Among the neighborhoods represented are Berwick, Brewery District, Central Hilltop, Clintonville, Forest Park East, Franklinton, Galloway, Glenview Heights, Grandview, Linden, Merion Village, Short North, Near East, Old North, Olde Town East, Reeb-Hosack, Salem Village, Short North, South Side, Southern Orchards, Victorian Village, West Side, Westgate, Woodland Park, and Worthington Hills.
- Thirty-seven percent (37%) of survey participants live in Franklin County outside of Columbus. Areas of the county represented in the survey include Bexley, Blacklick, Canal Winchester, Gahanna, Pickerington, Upper Arlington, Westerville, Whitehall, and Worthington.
- About three-quarters of respondents (75%) are white, 19% are African American or Black, and 1% are Asian or Pacific Islander. Only two respondents (3%) regularly speak a language other than English at home.
- About one-quarter of survey takers (26%) have or live with someone who has a disability.
- Nearly 60% of respondents own their homes and 36% rent their home.

Participants' Thoughts about their Neighborhoods

- When asked how satisfied they are with the neighborhood where they live, 37% of respondents are “very satisfied,” and 54% are “somewhat satisfied.” Only six survey takers (9%), report being “not very satisfied” or “not at all satisfied.”
- What survey takers like best about their neighborhoods is shown in the word cloud to the right. Safety, quiet, walkability, proximity to downtown, access to shopping and services, diversity, and parks and other greenspace are top responses.
- When asked what improvements they would like to see in their neighborhoods, more affordable housing, better property upkeep and trash removal, sidewalk improvement or expansion, improved public transit, more racial and economic diversity, and more code enforcement (including addressing boarded up or vacant properties) are common answers.
- Regarding availability of various community resources, about two-thirds of respondents (65-67%) say their neighborhoods give them good access to places to shop and bank, parks and trails, and housing that is in good condition. Access to reliable bus service, housing that they can afford, and quality public schools vary the most – between 41 and 51% of respondents report having access to these things and between 18 and 20% do not.



Participants' Thoughts about Fair Housing

- When asked to select whether they think housing discrimination is an issue in Columbus and Franklin County, 60% of participants said “yes” and 27% said it “may be an issue.” Eight percent (8%) said they “don’t know if housing discrimination is an issue,” and only 5% (or 3 survey takers) answered “no.”

- A little over half of respondents (54%) understand their fair housing rights and another 31% somewhat understand these rights. Nearly half (48%) report knowing where to file a fair housing complaint.
- Three survey takers (5%) experienced housing discrimination since living the Columbus/Franklin County area. They were discriminated against by landlords/property managers, real estate agents, and mortgage lenders on the bases of race, ethnicity, and sex. Respondents did not file reports of discrimination due to not knowing what good it would do, not knowing where to file, fear of retaliation, and lack of accessibility due to a disability.
- When asked to identify whether they think various factors may be barriers to fair housing in Columbus and Franklin County, survey participants' top selections were:
 - Displacement of residents due to rising housing costs (selected by 80% of respondents);
 - Not enough affordable rental housing for individuals (selected by 79%);
 - Community opposition to affordable housing (selected by 70%);
 - Discrimination by landlords or rental agents (selected by 69%);
 - Neighborhoods that need revitalization and new investment (selected by 64%); and
 - Not enough affordable rental housing for small families (selected by 64%).

CHAPTER 3.

SOCIOECONOMIC PROFILE

DEMOGRAPHIC PROFILE

As of the 2017 Census population estimates, the total population of the city of Columbus is 879,170 which accounts for 42% of the population in the Columbus region, defined by HUD as Fairfield, Hocking, Licking, Madison, Morrow, Perry, Pickaway, and Union Counties. The Franklin County population outside the city of Columbus is 427,601. Since 1990, the city, county, and region have experienced steady growth in total population, as the population increased by 9% in each of the last two censuses within the city and 14% for each of the last two censuses within the region.

Race and Ethnicity

The population of Columbus is becoming more diverse. At 61% of the population, whites make up the majority of the population but both their share of the population and the total white population has been decreasing since 1990, when they accounted for 75% of the population. African Americans are the second-largest racial group at 29%, and their share of the population has increased from 21% in 1990. Unlike the white population, which declined in the 1990s and 2000s, the African American population increased by 28% and 25%, respectively, in the same period.

As of 2010, Hispanics are the next largest minority group just ahead of Asian Americans. The Hispanic population is proportionally the fastest growing of any racial or ethnic group, increasing by over 500% from 6,718 in 1990 to 42,231 in 2010. Asian Americans make up almost 5% of the population, and their population is steadily increasing though at a slower rate than Hispanics. Native Americans make up less than 1% of the population, and their population held steady in the 2000s after increasing in the 1990s.

Franklin County outside of Columbus is less diverse, with whites accounting for 80% of the population. Since 1990, some of the same trends exist in the region as in the city: the share of the population that is white has declined from 94%, both the share and absolute population that is African American and Latino has increased substantially. Also, the Asian population has steadily increased. One notable difference is that although the percentage of the total population that is white is declining in both the city and the region, in the region, the white population is increasing (though more slowly than other groups) while in the city the white population is decreasing.

National Origin

The foreign-born population currently makes up about 11% of the population of Columbus. This population has more than doubled since 1990, when the foreign-born population was only 4% of the population. The largest share of the foreign-born population is from Mexico. Most of the rest of the immigrant population is from Eastern Africa, India, and China, and smaller groups of immigrants are from Western Africa, El Salvador, Korea, and Vietnam.

At 7% of the total population, the foreign-born population in Franklin County outside of Columbus makes up a smaller percentage than in the city limits. As in the city, this population has increased since 1990, when it was 3% of the population. The largest share of the foreign-born population in the county is from India, and most of the remainder are from Mexico, China, Korea, and Ethiopia.

LEP

The population dynamics with limited English Proficiency (LEP) often resemble patterns of population change found among foreign-born residents in a community. This is true in Columbus, as the LEP portion of the population has increased substantially since 1990, though at a lesser rate than the foreign-born population (202% to 254%). This could indicate more immigrants are English-speaking, or some foreign-born residents are learning English, or some other factor that.

As expected with Mexico being the most common country of origin for the foreign-born population, Spanish is the most common language spoken by the LEP population in Columbus and Franklin County. The breakdown of the rest of the languages spoken by the LEP population is consistent with the national origin of foreign-born residents. The next most common languages spoken by the LEP population in both the city and the region are African, Chinese, and Arabic. There are small populations (less than 0.1% of the total population) that speak other European and Asian languages.

Disability

About 12% of the total population has a disability. The most common disability type in Columbus and Franklin County is ambulatory difficulties, which the Census Bureau defines as difficulty walking or climbing stairs. People with ambulatory difficulties make up 6.7% of the total population of the city and 5.6% of the county. People with a cognitive difficulty make up 5.8% of the population of Columbus and 4.5% of the county, and people with hearing or vision impairments each make up 3% or less of the city and county. Disabilities that require assistance such as difficulties with independent living or self-care make up about 4% and 2% of the city and county populations, respectively.

Age

The age distribution of Columbus residents skews young. The largest segment of the population (68%) is between the ages of 18 and 64. However, the population under the age of 18 (23%) is significantly larger than the population that is 65 and over (9%). This distribution has been fairly consistent since 1990, and in contrast to many parts of the country where the population is aging, the share of the population that is 65 and over has decreased slightly, from 9.3% in 1990 to 9.1% currently. The distribution is similar in Franklin County outside of Columbus, though the 18-64 year old group is slightly smaller (63%) and the under 18 (26%) and 65+ (11%) groups are slightly larger.

Sex

The gender distribution of the City of Columbus is proportionally balanced between male and female. The female population is the slight majority and comprises 51.1% of the population. At the county level, the female population is slightly higher at 51.7%.

Family Type

About half of the families in Columbus have children (48.1%). Though the absolute numbers have varied since 1990, the share of the population with children has been consistent, increasing slightly from 49.5% in 1990 to 50.2% in 2000 and then decreasing slightly to 48.1% in 2010. This trend is apparent in county as well, where about 48% of families have children.

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TABLE 1 – DEMOGRAPHIC OVERVIEW

Demographic Indicator	City of Columbus		Franklin County		Columbus Region				
	#	%	#	%	#	%			
Race and Ethnicity									
Non-Hispanic									
White	469,448	60.5%	343,294	80.3%	1,458,078	76.7%			
Black	208,304	26.8%	42,111	9.9%	270,562	14.2%			
Asian or Pacific Islander	31,008	4.0%	16,560	3.9%	57,838	3.0%			
Native American	1,621	0.2%	719	0.2%	3,718	0.2%			
Two or More Races	21,748	2.8%	9,354	2.2%	41,462	2.2%			
Other	1,937	0.3%	794	0.2%	3,463	0.2%			
Hispanic	42,231	5.4%	14,769	3.5%	66,853	3.5%			
National Origin									
#1 country of origin	Mexico	13,909	1.9%	India	4,096	1.0%	Mexico	18,378	1.0%
#2 country of origin	Other Eastern Africa	8,091	1.1%	Mexico	3,261	0.8%	India	14,722	0.8%
#3 country of origin	India	8,072	1.1%	China*	1,704	0.4%	Other Eastern Africa	8,847	0.5%
#4 country of origin	China*	4,910	0.7%	Korea	1,262	0.3%	China*	7,567	0.4%
#5 country of origin	Ghana	2,961	0.4%	Ethiopia	1,198	0.3%	Korea	3,814	0.2%
#6 country of origin	Other Western Africa	2,695	0.4%	Canada	953	0.2%	Ghana	3,672	0.2%
#7 country of origin	Kenya	2,283	0.3%	Philippines	860	0.2%	Philippines	2,991	0.2%
#8 country of origin	El Salvador	1,925	0.3%	Germany	831	0.2%	Ethiopia	2,977	0.2%
#9 country of origin	Korea	1,857	0.3%	Japan	732	0.2%	Canada	2,855	0.2%
#10 country of origin	Vietnam	1,735	0.2%	Russia	692	0.2%	Other Western Africa	2,836	0.2%
Limited English Proficiency (LEP) Language									
#1 LEP Language	Spanish	16,478	2.2%	Spanish	4,034	1.0%	Spanish	22,337	1.2%
#2 LEP Language	African	8,081	1.1%	African	1,109	0.3%	African	9,363	0.5%
#3 LEP Language	Chinese	3,946	0.5%	Chinese	915	0.2%	Chinese	5,466	0.3%
#4 LEP Language	Arabic	2,199	0.3%	Korean	538	0.1%	Arabic	2,679	0.2%
#5 LEP Language	French	1,729	0.2%	Russian	505	0.1%	Other Asian Language	2,143	0.1%

TABLE 1 – DEMOGRAPHIC OVERVIEW (CONTINUED)

Demographic Indicator	City of Columbus		Franklin County		Columbus Region				
	#	%	#	%	#	%			
Limited English Proficiency (LEP) Language (continued)									
#6 LEP Language	Other Asian Language	1,644	0.2%	Japanese	496	0.1%	French	2,005	0.1%
#7 LEP Language	Russian	1,139	0.2%	Vietnamese	340	0.1%	Korean	1,866	0.1%
#8 LEP Language	Vietnamese	1,031	0.1%	Arabic	333	0.1%	Russian	1,773	0.1%
#9 LEP Language	Korean	986	0.1%	Other Slavic Language	312	0.1%	Japanese	1,679	0.1%
#10 LEP Language	Japanese	833	0.1%	Other Asian Language	305	0.1%	Vietnamese	1,611	0.1%
Disability Type									
Hearing difficulty		20,642	2.8%		12,162	3.1%		56,155	3.2%
Vision difficulty		15,909	2.2%		6,443	1.6%		35,590	2.0%
Cognitive difficulty		42,356	5.8%		17,702	4.5%		92,130	5.2%
Ambulatory difficulty		48,832	6.7%		22,185	5.6%		113,648	6.4%
Self-care difficulty		18,875	2.6%		8,184	2.1%		42,386	2.4%
Independent living difficulty		32,658	4.5%		15,969	4.1%		76,268	4.3%
Sex									
Male		379,599	48.9%		206,570	48.3%		934,176	49.1%
Female		396,698	51.1%		221,031	51.7%		967,798	50.9%
Age									
Under 18		178,754	23.0%		111,292	26.0%		471,223	24.8%
18-64		527,063	67.9%		267,754	62.6%		1,227,049	64.5%
65+		70,480	9.1%		48,555	11.4%		203,702	10.7%
Family Type									
Families with children		84,186	48.1%		55,369	48.6%		225,884	47.4%

*Excluding Hong Kong and Taiwan

Note: All % represent a share of the total population within the jurisdiction or region, except family type, which is out of total families. The most populous places of birth and languages at the city, county, and regional levels may not be the same, and are thus labeled separately.

Data Sources: Decennial Census; ACS

TABLE 2 – DEMOGRAPHIC TRENDS

Demographic Indicator	City of Columbus						Franklin County					
	1990		2000		2010		1990		2000		2010	
	#	%	#	%	#	%	#	%	#	%	#	%
Race and Ethnicity												
Non-Hispanic												
White	493,474	75.1%	484,790	67.8%	469,448	60.5%	292,796	93.5%	335,276	87.7%	343,294	80.3%
Black	139,807	21.3%	178,765	25.0%	223,134	28.7%	12,172	3.9%	25,440	6.7%	47,334	11.1%
Asian or Pacific Islander	14,124	2.2%	26,525	3.7%	35,094	4.5%	4,766	1.5%	11,074	2.9%	19,125	4.5%
Native American	1,342	0.2%	4,199	0.6%	4,196	0.5%	476	0.2%	1,834	0.5%	2,158	0.5%
Hispanic	6,718	1.0%	17,028	2.4%	42,231	5.4%	2,408	0.8%	7,603	2.0%	14,769	3.5%
National Origin												
Foreign-born	23,339	3.6%	46,256	6.5%	75,289	9.7%	9,019	2.9%	19,390	5.1%	29,225	6.8%
English Proficiency												
Limited English proficiency	13,834	2.1%	26,691	3.7%	39,285	5.1%	4,398	1.4%	10,800	2.8%	13,069	3.1%
Sex												
Male	317,325	48.3%	347,949	48.7%	379,599	48.9%	150,039	47.9%	185,113	48.4%	206,570	48.3%
Female	339,455	51.7%	366,957	51.3%	396,698	51.1%	163,020	52.1%	197,035	51.6%	221,031	51.7%
Age												
Under 18	156,847	23.9%	177,774	24.9%	178,754	23.0%	82,450	26.3%	106,146	27.8%	111,292	26.0%
18-64	438,772	66.0%	471,346	65.9%	527,063	67.9%	198,718	63.5%	235,789	61.7%	267,754	62.6%
65+	61,162	9.3%	65,786	9.2%	70,480	9.1%	31,891	10.2%	40,213	10.5%	48,555	11.4%
Family Type												
Families with children	78,835	49.5%	69,406	50.2%	84,186	48.1%	43,984	50.6%	40,311	51.3%	55,369	48.6%

Note: All % represent a share of the total population within the jurisdiction or region, except family type, which is out of total families. The most populous places of birth and languages at the city and county levels may not be the same, and are thus labeled separately.

Data Sources: Decennial Census; ACS

RACIALLY AND ETHNICALLY CONCENTRATED AREAS OF POVERTY

This study uses a methodology developed by HUD that combines demographic and economic indicators to identify racially or ethnically concentrated areas of poverty (R/ECAPs). These areas are defined as census tracts that have an individual poverty rate of 40% or more (or an individual poverty rate that is at least 3 times that of the tract average for the metropolitan area, whichever is lower) and a non-white population of 50% or more. Using a metric that combines demographic and economic indicators helps to identify a jurisdiction's most vulnerable communities.

Nationally, the racial and ethnic composition of neighborhoods with concentrations of poverty is disproportionate relative to the U.S. population overall. According to the U.S. Department of Health and Human Services, Black and Hispanic populations comprise nearly 80% of the population living in areas of concentrated poverty in metropolitan areas, but only account for 42.6% of the total poverty population in the U.S.⁴ Overrepresentation of these groups in areas of concentrated poverty can exacerbate disparities related to safety, employment, access to jobs and quality education, and conditions that lead to poor health.

Identification of R/ECAPs is significant in determining priority areas for reinvestment and services to ameliorate conditions that negatively impact R/ECAP residents and the larger region. Since 2000, the prevalence of concentrated poverty in the U.S. has expanded by nearly 75% in both population and number of neighborhoods. The majority of concentration of poverty is within the largest metro areas, but suburban regions have experienced the fastest growth rate.⁵

There are currently 26 R/ECAP census tracts in Franklin County. Most (21 out of 26) lie wholly within the city of Columbus, although five cross the city limits to include small areas of unincorporated Franklin County. No R/ECAP tracts extend into any Franklin County cities other than Columbus. Generally, most R/ECAP tracts are in the eastern central portion of the city: 16 of the 26 tracts are east of I-71 and north of I-70.

Columbus' largest R/ECAP is a group of 13 contiguous tracts in the center of the city, roughly bounded by Innis Road on the north, Alum Creek and Billiter Boulevard on the east, East Broad Street on the south, and North High Street on the west. These tracts cover the Framingham, Arlington Park, East Linden, South Linden, Fairgrounds, Milo-Grogan, Weinland Park, Devon Triangle, and Mount Vernon neighborhoods, as well as portions of North Linden, Bronzeville, and Bridgeview. Linden, Windsor, and Saunders parks lie within this area, as do eight public housing communities (Kenmore Square, Rosewind, Sawyer Manor & Towers, Ohio Townhouses, Thornwood Commons, Trevitt Heights II, Jenkins Terrace II, and Poindexter Place) and six project-based Section 8 communities (Capital Park, Mt Vernon Plaza I and II, Uptown Village, Victorian Heritage, and Love Zion).

⁴ United States, Department of Health and Human Services, Office of the Assistant Secretary for Planning and Evaluation. "Overview of Community Characteristics in Areas With Concentrated Poverty." ASPE Issue Brief, May 2014, https://aspe.hhs.gov/system/files/pdf/40651/rb_concentratedpoverty.pdf.

⁵ ³ Kneebone, Elizabeth. "The Growth and Spread of Concentrated Poverty, 2000 to 2008-2012." *The Brookings Institution*, 29 July 2016, www.brookings.edu/interactives/the-growth-and-spread-of-concentrated-poverty-2000-to-2008-2012/.

The second group of R/ECAP census tracts are immediately southwest of the Columbus International airport in the East Columbus, Broadleigh, and Eastmoor neighborhoods. These four tracts contain Krum Park, one public housing community (Eastmoor Square), and five project-based Section 8 communities (Sterling Court, New Canterbury Way, Chandler Arms, Napoleon Park, and Royal York).

There are four R/ECAP areas in the southern portion of the city. In the Eastland neighborhood, there is one R/ECAP tract lying southwest of the I-70 and I-270 intersection. While there are no public housing communities in this area, there is one project-based Section 8 apartment complex – Eastland Manor.

Moving to the west, there is a group of five contiguous R/ECAP tracts in the South of Main, Southern Orchards, Driving Park, Deschler Park, Milbrook, and Southeast neighborhoods. A north-south and an east-west rail line runs through this area, and commercial and light industrial uses make up much of the area between the railroad and I-70 in Milbrook and Southeast. There is one project-based Section 8 property here (Alliance) and no public housing.

Two tracts in East and South Franklinton are also R/ECAPs. They are roughly bounded by the Scioto River on the east, Highway 315 (north of I-70) and Brown Road (south of I-70) on the west, and Stimmel Road on the south. The Green Lawn Cemetery and Lou Berliner Sports Park are significant land uses in this area, and these tracts contain two project-based Section 8 communities – Griggs Village and Southpark Apartments – both adjacent to Sullivant Elementary School.

The final R/ECAP is on the southwestern edge of Columbus in the Riverbend and Georgian Heights neighborhoods, around Big Run Park just east of I-270. One public housing community (Post Oak Station) and two project-based Section 8 properties (Ashton Square and Network Residential Apartments) are located there.

The number of R/ECAPs has increased from 19 in 1990 and 20 in 2000. The large contiguous group of R/ECAPs in the eastern central area has existed since 1990 though the specific tracts have varied over time, and the trend has been towards more tracts on the periphery than concentrated in the central city.

As Table 3 shows, the 26 R/ECAP census tracts are home to 68,559 residents (the vast majority of whom live in the city of Columbus (64,792 residents or 95%)). At the city level, African Americans are significantly disproportionately more likely to reside in an R/ECAP than other racial and ethnic groups. African American residents make up 66% of the R/ECAP population but only 27% of the population in the city. About one-fifth (21%) of the African American population and 13% of the Hispanic population lives in R/ECAPs. African Americans are 6.8 times as likely as whites to live in an R/ECAP and Hispanics are 4.3 times as likely as whites to live in a R/ECAP. All other racial and ethnic groups constitute smaller shares of the R/ECAP population than their shares of the population citywide. These ratios are nearly identical at the regional level.

Looking at familial status, 54% of families living in an R/ECAP have children. This share is somewhat above the shares throughout the city and county (48%).

The foreign born population in R/ECAPs is relatively low. Mexicans (2.8%) and East Africans (2.3%) are the two largest groups, and their share of the population is slightly higher in R/ECAPs than in the city overall.

Other countries of origin make up less than a percent each of the R/ECAP population, including Ethiopia, El Salvador, Kenya, Western Africa, Ghana, Guatemala, Cuba, and the Dominican Republic.

TABLE 3 – R/ECAP DEMOGRAPHICS

Demographic Indicator	City of Columbus		Franklin County			
	#	%	#	%		
Race and Ethnicity						
Total population in R/ECAPs	64,792	-	3,767	-		
Non-Hispanic						
White	14,231	22.0%	1,039	27.6%		
Black	43,081	66.5%	2,399	63.7%		
Asian or Pacific Islander	700	1.1%	31	0.8%		
Native American	213	0.3%	19	0.5%		
Other	169	0.3%	13	0.4%		
Hispanic	4,196	6.5%	158	4.2%		
Family Type						
Total families in R/ECAPs	14,502	-	892	-		
Families with children	7,862	54.2%	508	57.0%		
National Origin						
Total population in R/ECAPs	64,792	-	3,767	-		
#1 country of origin	Mexico	1,800	2.8%	Other Eastern Africa	338	9.0%
#2 country of origin	Other Eastern Africa	1,503	2.3%	Mexico	88	2.3%
#3 country of origin	Ethiopia	309	0.5%	Ghana	44	1.2%
#4 country of origin	El Salvador	243	0.4%	Kenya	34	0.9%
#5 country of origin	Kenya	231	0.4%	Saudi Arabia	21	0.6%
#6 country of origin	Other Western Africa	229	0.4%	Cameroon	17	0.5%
#7 country of origin	Ghana	206	0.3%	Ethiopia	16	0.4%
#8 country of origin	Guatemala	118	0.2%	Nigeria	11	0.3%
#9 country of origin	Cuba	109	0.2%	Cuba	11	0.3%
#10 country of origin	Dominican Republic	105	0.2%	Turkey	11	0.3%

Note: The most populous places of birth at the city and county levels may not be the same, and are thus labeled separately.

Data Sources: Decennial Census; ACS

FIGURE 1. RACIALLY AND ETHNICALLY CONCENTRATED AREAS OF POVERTY (R/ECAP) IN THE CITY OF COLUMBUS, 2010

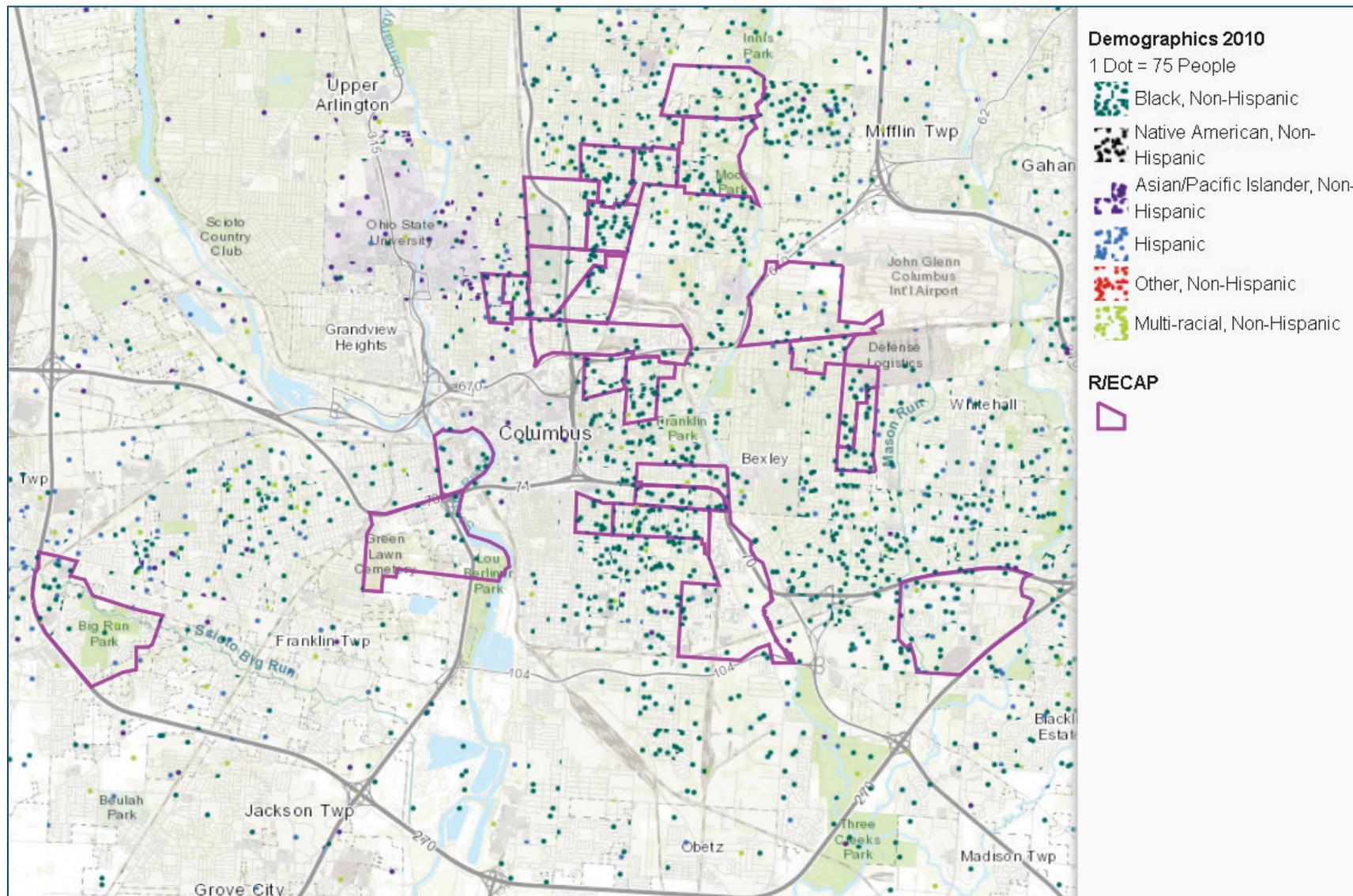


FIGURE 2. RACIALLY AND ETHNICALLY CONCENTRATED AREAS OF POVERTY (R/ECAP) IN THE CITY OF COLUMBUS, 2000

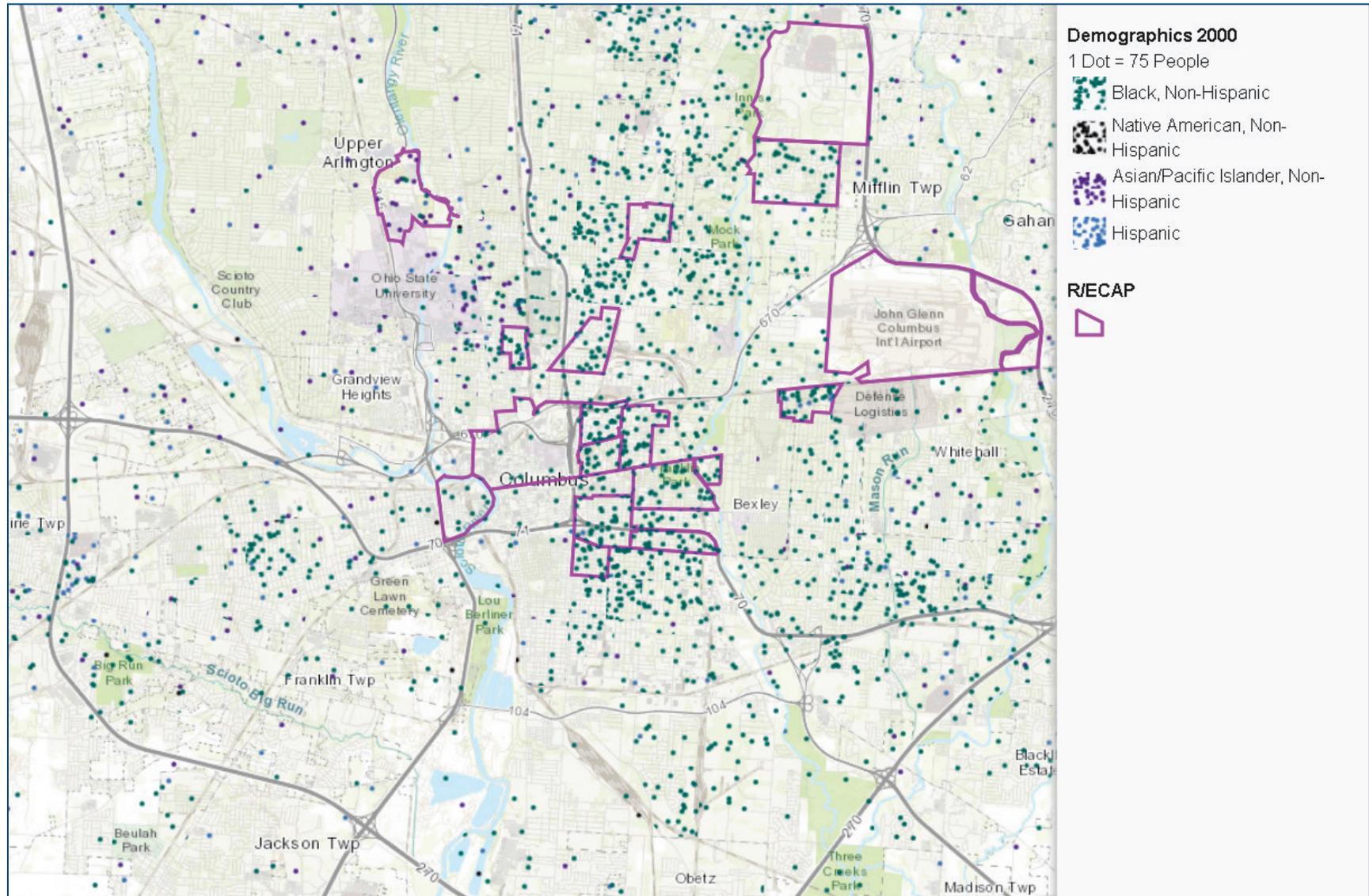
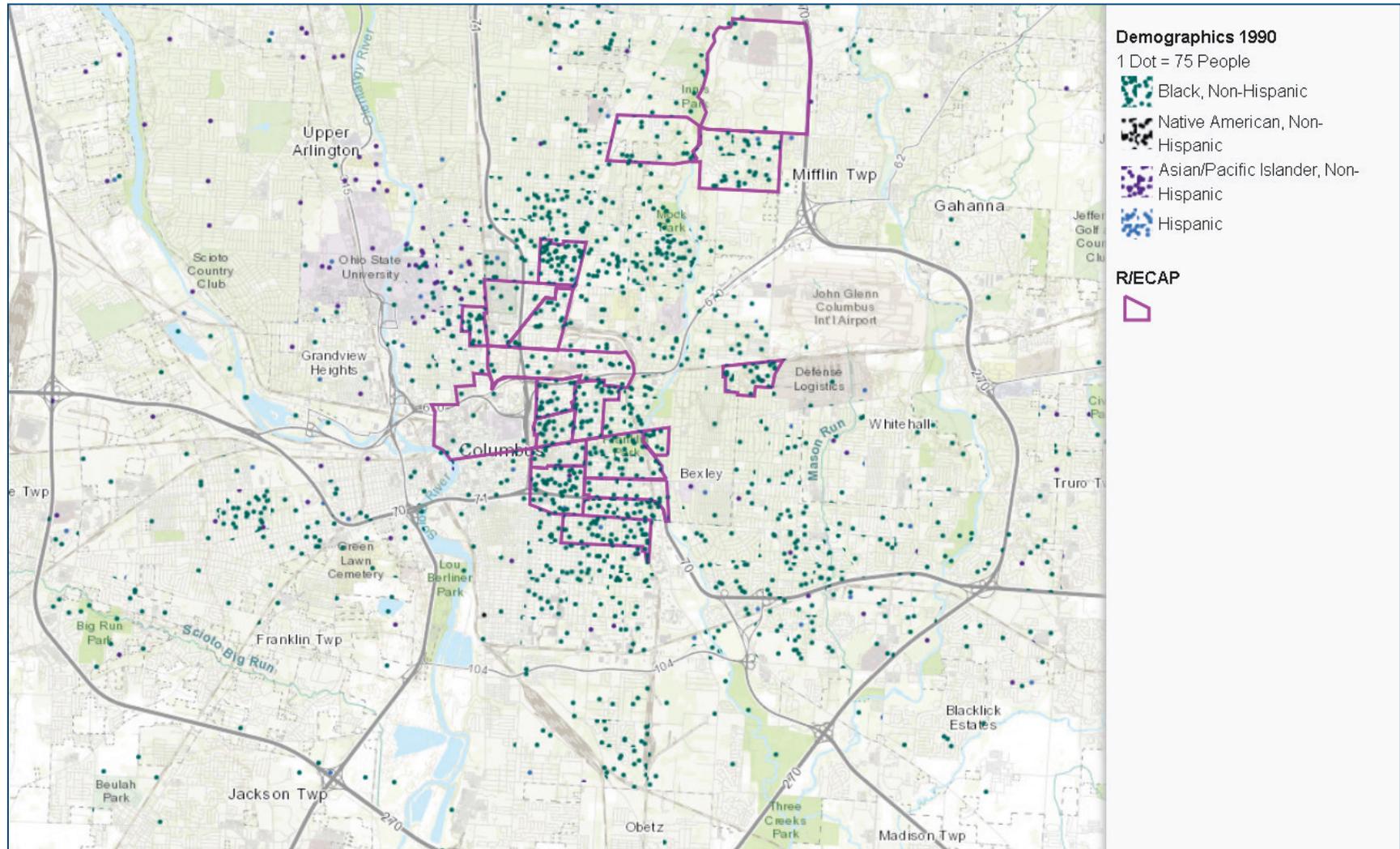


FIGURE 3. RACIALLY AND ETHNICALLY CONCENTRATED AREAS OF POVERTY (R/ECAP) IN THE CITY OF COLUMBUS, 1990



CHAPTER 4.

SEGREGATION & INTEGRATION

Communities experience varying levels of segregation between different racial, ethnic, and socioeconomic groups. High levels of residential segregation often lead to conditions that exacerbate inequalities among population groups within a community. Increased concentrations of poverty and unequal access to jobs, education, and other services are some of the consequences of high residential segregation.⁶

Federal housing policies and discriminatory mortgage lending practices prior to the Fair Housing Act of 1968 not only encouraged segregation, but mandated restrictions based on race in specific neighborhoods. The Fair Housing Act of 1968 outlawed discriminatory housing practices, but did little to address the existing segregation and inequalities. Other federal housing policies and programs, like Section 8 and HOPE VI, have been implemented in an effort to ameliorate the negative effects of residential segregation and reduce concentrations of poverty. Despite these efforts, the repercussions of the discriminatory policies and practices continue to have a significant impact on residential patterns today.

RACE AND ETHNICITY

In 2010, the spatial distribution of the overall population was relatively uniform throughout the city of Columbus. The most densely populated neighborhood was between the Ohio State University and downtown, with other pockets of dense neighborhoods surrounding downtown. The African American population is distributed throughout the city, but there are several areas of concentration. Eastern Columbus in general has a higher population of African Americans than western Columbus. The neighborhoods immediately east of downtown have the highest population of African Americans. Other areas of concentration include the neighborhoods in Columbus south of Bexley and Whitehall and in northeast Columbus just north of the airport. Figure 5 shows that within the region, minority groups are noticeably grouped in and around urban areas more so than the white population.

Between 1990 and 2010, some geographical shifts occurred among racial and ethnic minority groups. The African American population noticeably grew in the neighborhoods south of Bexley and Whitehall and in northeast Columbus. Also, Hispanic and Asian American populations, grew but appeared to be more dispersed than the African American population.

⁶ Massey, D. (1990). American Apartheid: Segregation and the Making of the Underclass. *American Journal of Sociology*, 96(2), 329-357. Retrieved from <http://www.jstor.org/stable/2781105>

FIGURE 4. POPULATION BY RACE AND ETHNICITY IN THE CITY OF COLUMBUS, 2010

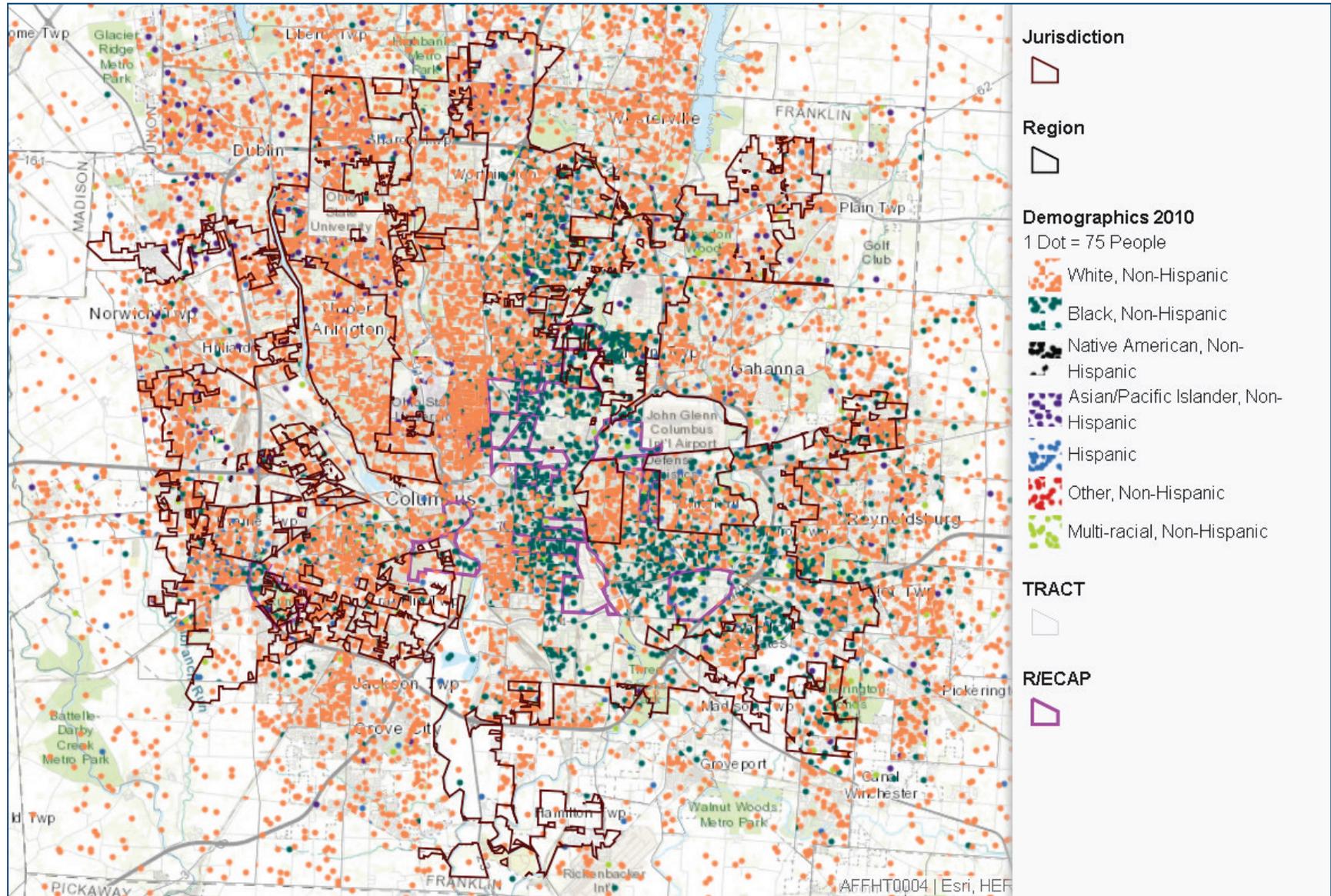


FIGURE 5. POPULATION BY RACE AND ETHNICITY (NON-WHITE) IN THE CITY OF COLUMBUS, 2010

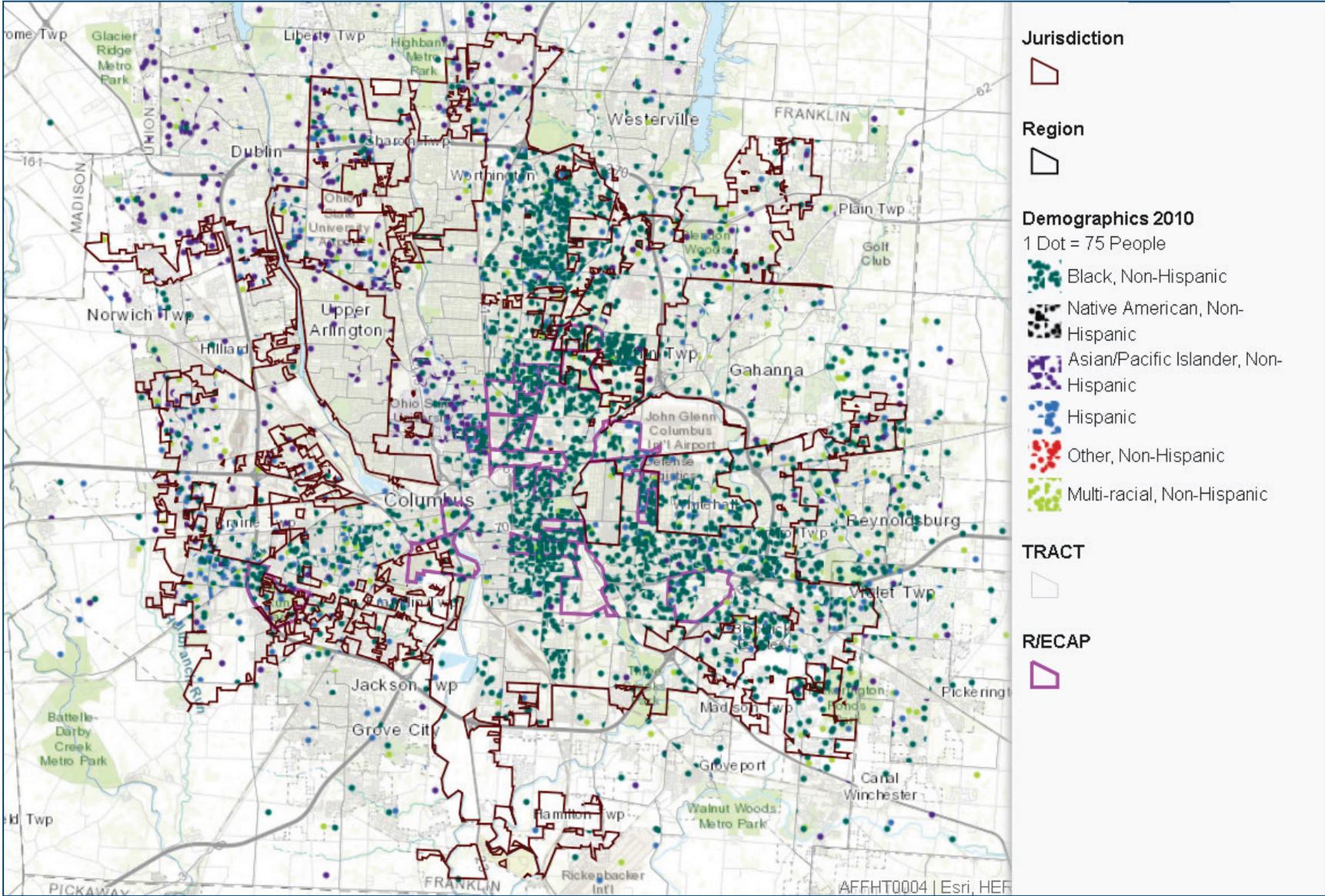


FIGURE 6. POPULATION BY RACE AND ETHNICITY IN THE CITY OF COLUMBUS, 2000

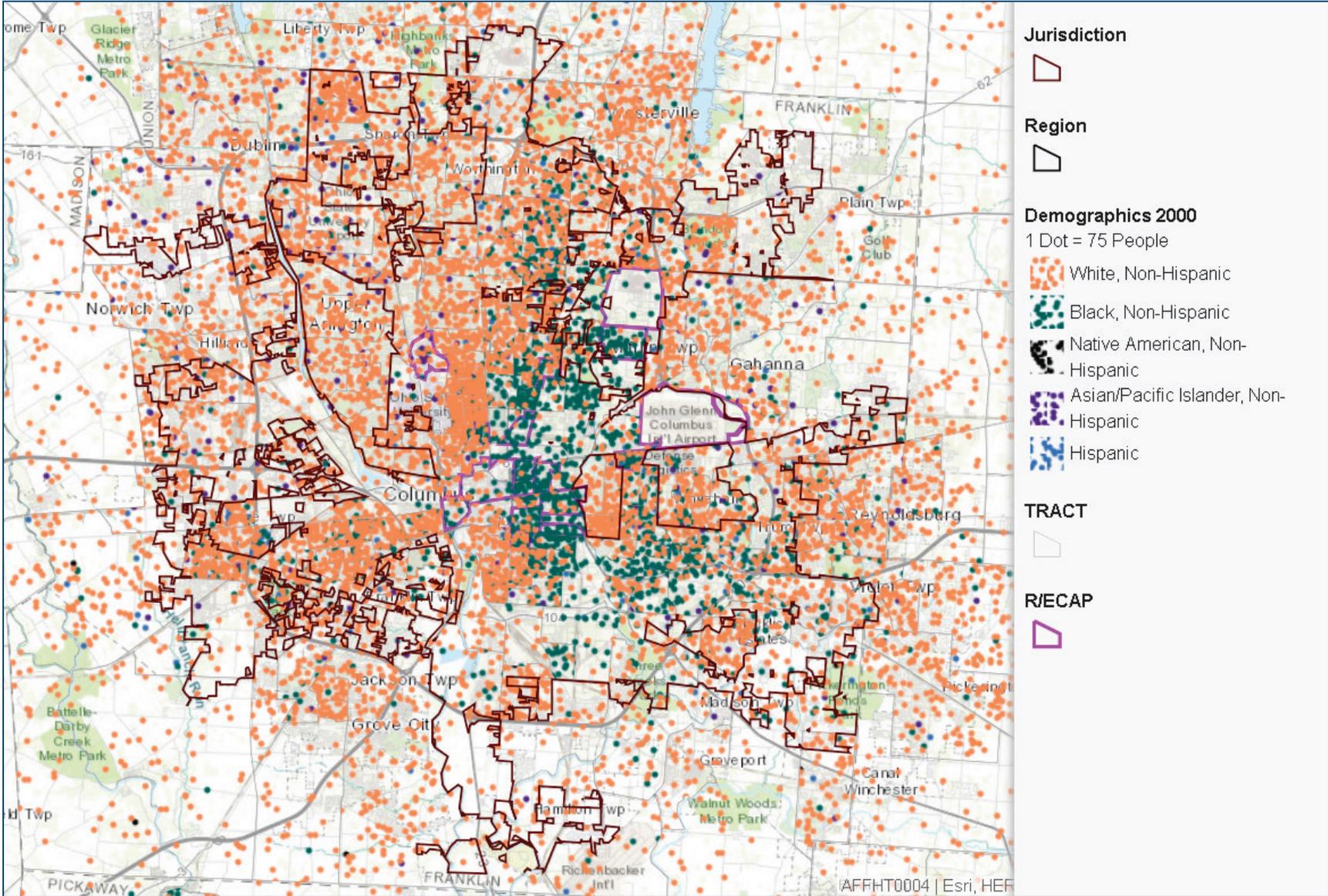
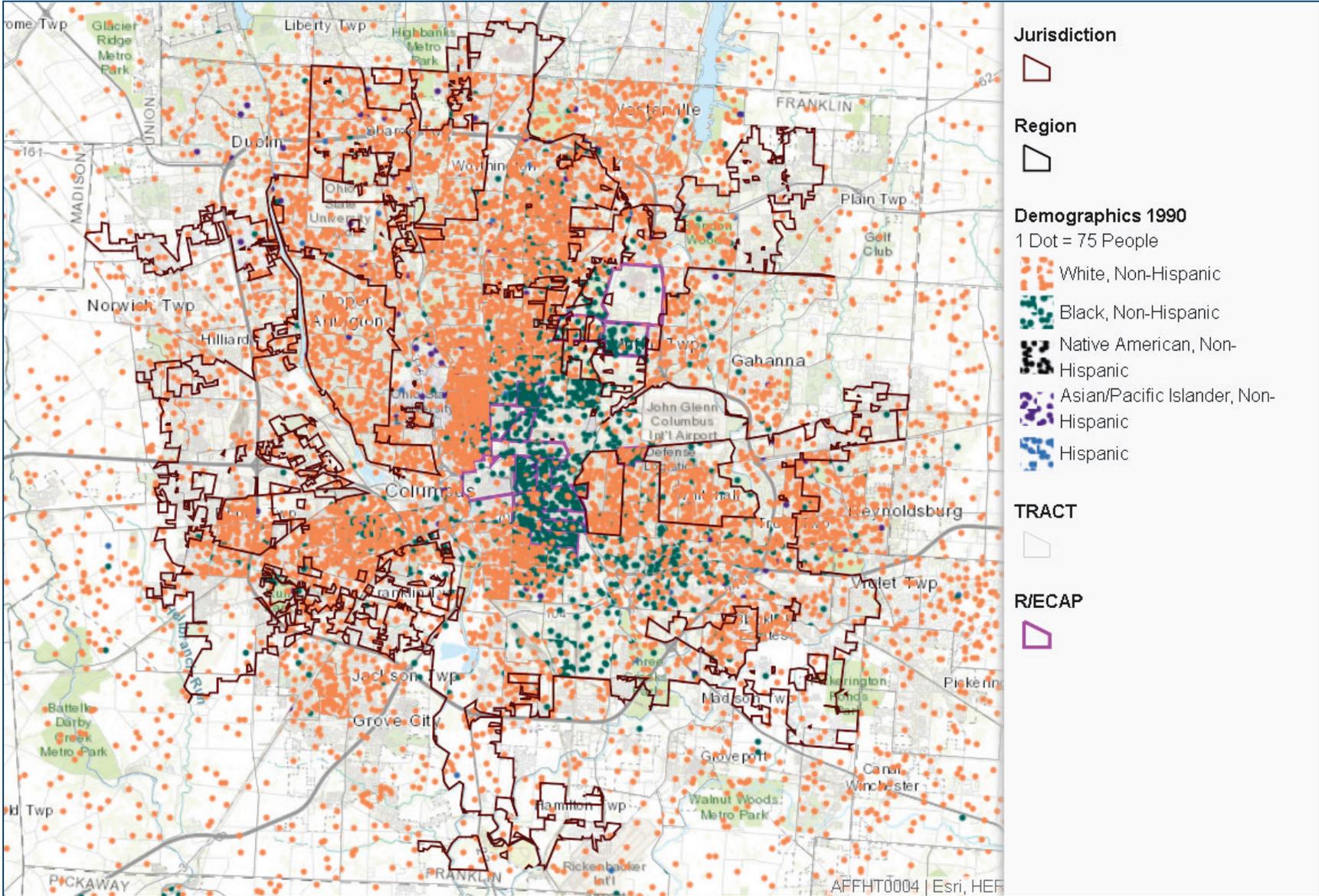


FIGURE 7. POPULATION BY RACE AND ETHNICITY IN THE CITY OF COLUMBUS, 1990



SEGREGATION LEVELS

In addition to visualizing Columbus and Franklin County's racial and ethnic composition with the preceding maps, this study also uses a statistical analysis – referred to as dissimilarity – to evaluate how residential patterns vary by race and ethnicity, and how these patterns have changed since 1990. The Dissimilarity Index (DI) indicates the degree to which a minority group is segregated from a majority group residing in the same area because the two groups are not evenly distributed geographically. The DI methodology uses a pair-wise calculation between the racial and ethnic groups in the region. Evenness, and the DI, are maximized and segregation minimized when all small areas have the same proportion of minority and majority members as the larger area in which they live. Evenness is not measured in an absolute sense, but is scaled relative to the other group. The DI ranges from 0 (complete integration) to 100 (complete segregation). HUD identifies a DI value below 40 as low segregation, a value between 40 and 54 as moderate segregation, and a value of 55 or higher as high segregation.

The proportion of the minority population group can be small and still not segregated if evenly spread among tracts or block groups. Segregation is maximized when no minority and majority members occupy a common area. When calculated from population data broken down by race or ethnicity, the DI represents the proportion of minority members that would have to change their area of residence to match the distribution of the majority, or vice versa.

The table below shares the dissimilarity indices for four pairings in Columbus, Franklin County, and the Columbus region. This table presents values for 1990, 2000, and 2010, all calculated using census tracts as the area of measurement. The last figure is calculated using block groups. Because block groups are typically smaller geographies, they measure segregation at a finer grain than analyses that use census tracts and, as a result, often indicate slightly higher levels of segregation than tract-level calculations.⁷ This assessment begins with a discussion of segregation at the tract-level from 1990 through 2010, and then examines the “current” figures calculated using block groups.

As of 2010, segregation levels calculated by census tract in Columbus and the region were moderate for whites to non-whites, moderate for African Americans to whites, and low to moderate for Asian Americans and Native Americans to whites. In the city, they ranged from a low of 32 for Asian Americans to whites to a high of 54 for African Americans to whites. In Franklin County outside of Columbus, segregation levels are low for most pairings, with the exception of white and Black residents, for which it is moderate at 46.

While segregation levels may be relatively low or moderate when looking at the city and county themselves, regional levels reveal high segregation between Black at white residents, with a DI of 60. This is not surprising considering the difference in population shares for these two groups in these

⁷ Iceland, John and Erika Steinmetz. 2003. *The Effects of Using Block Groups Instead of Census Tracts When Examining Residential Housing Patterns*. U.S. Census Bureau, Washington DC: US. Accessed via www.census.gov/hhes/www/housing/resseg/pdf/unit_of_analysis.pdf.

This study of the effect of using census block groups instead of tracts to examine housing pattern in 331 metropolitan areas throughout the U.S. indicated that index scores were modestly higher when using block groups, by an average of 3.3 points for all metro area dissimilarity scores.

geographies. African American residents make up 29% of the population in the city, compared to only 11% of the population in Franklin County outside of Columbus. These figures indicate that there is strong segregation at the regional level, with the Black population much more likely to reside in Columbus than the region's white population is. Tract-level segregation indices for other pairings in the region were moderate, ranging from 42 to 48. Segregation of Asian Americans and Hispanics increases slightly more (7 and 10 points respectively) than other whites and African Americans (5 and six points respectively).

Segregation has consistently declined since 1990 in the city of Columbus and the region for all groups except for the Hispanic/white pairing, which has increased from 21 to 35 in 2010. In Franklin County outside of Columbus, segregation slightly for most pairing, with the exception of the White/Latino pairing, which increased from 17 in 1990 to 34 in 2010.

Examining the block group level figures show, as expected, higher scores for all pairings. This indicates that in addition to segregation between neighborhoods, there is also segregation within neighborhoods. The pattern of block group level scores is consistent with the pattern for those at the tract level.

Overall, the Dissimilarity Index indicates moderate levels of segregation at both the tract and block group level in Columbus that are slightly higher in the region and most extreme between African Americans and whites.

TABLE 4 – RACIAL / ETHNIC DISSIMILARITY TRENDS

Race/Ethnicity	City of Columbus				Franklin County				Columbus Region			
	Census Tract Level			Block Group Level (2010)	Census Tract Level			Block Group Level (2010)	Census Tract Level			Block Group Level (2010)
	1990	2000	2010		1990	2000	2010		1990	2000	2010	
Non-White/White	56.6	48.0	42.8	47.1	32.3	32.4	31.8	37.5	58.4	51.1	48.0	53.0
Black/White	64.0	58.1	54.3	58.1	47.3	45.7	46.3	52.7	67.5	62.8	60.6	65.2
Hispanic/White	21.4	28.4	35.1	39.7	17.2	36.8	34.0	36.8	28.6	37.7	42.2	45.2
Asian or Pacific Islander/White	36.3	31.7	31.9	37.2	35.1	30.5	33.9	41.3	45.8	42.5	41.6	48.3

Data Sources: Decennial Census

DRAFT

FIGURE 8. POPULATION BY RACE AND ETHNICITY IN THE COLUMBUS REGION, 2010

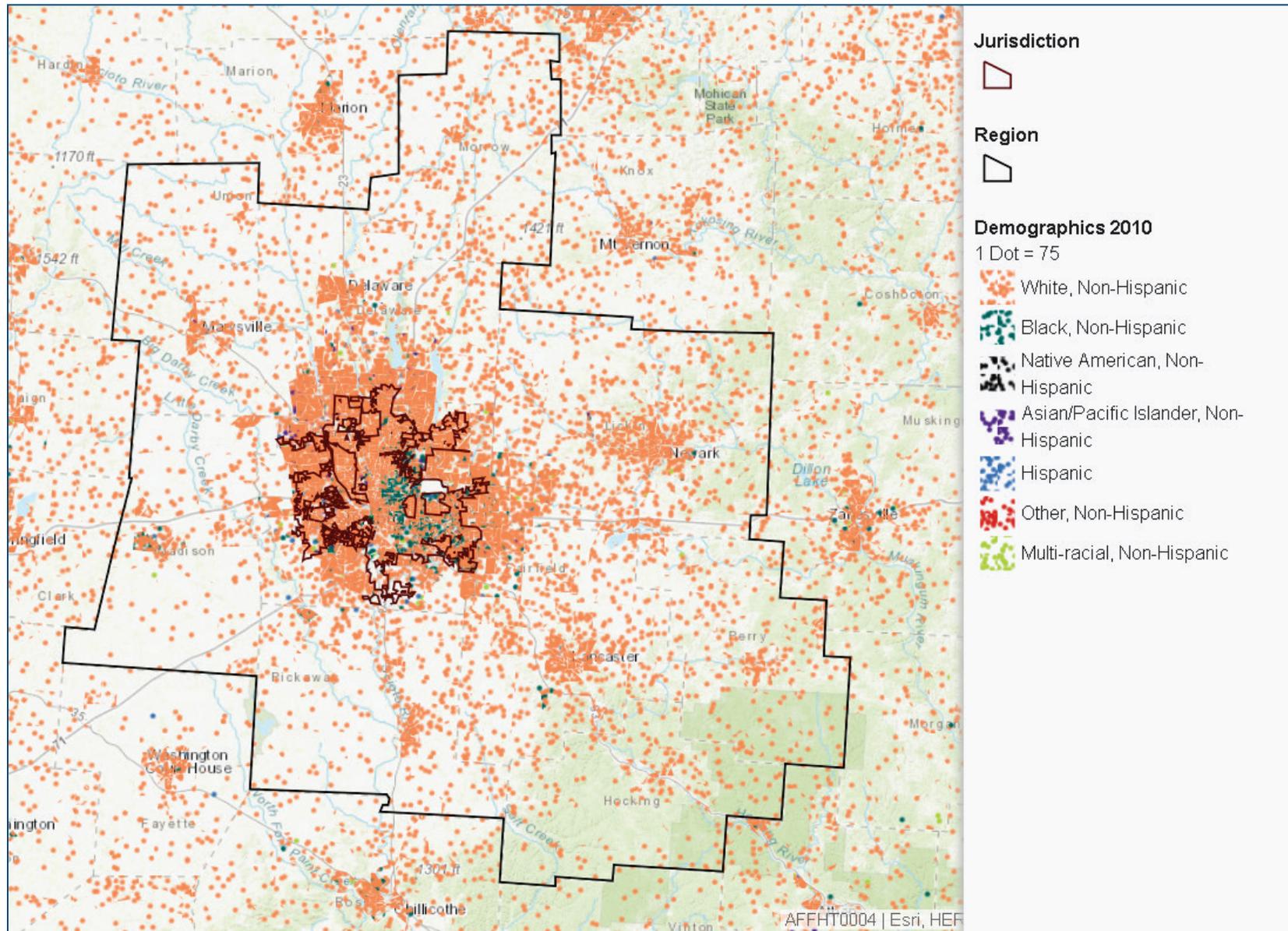
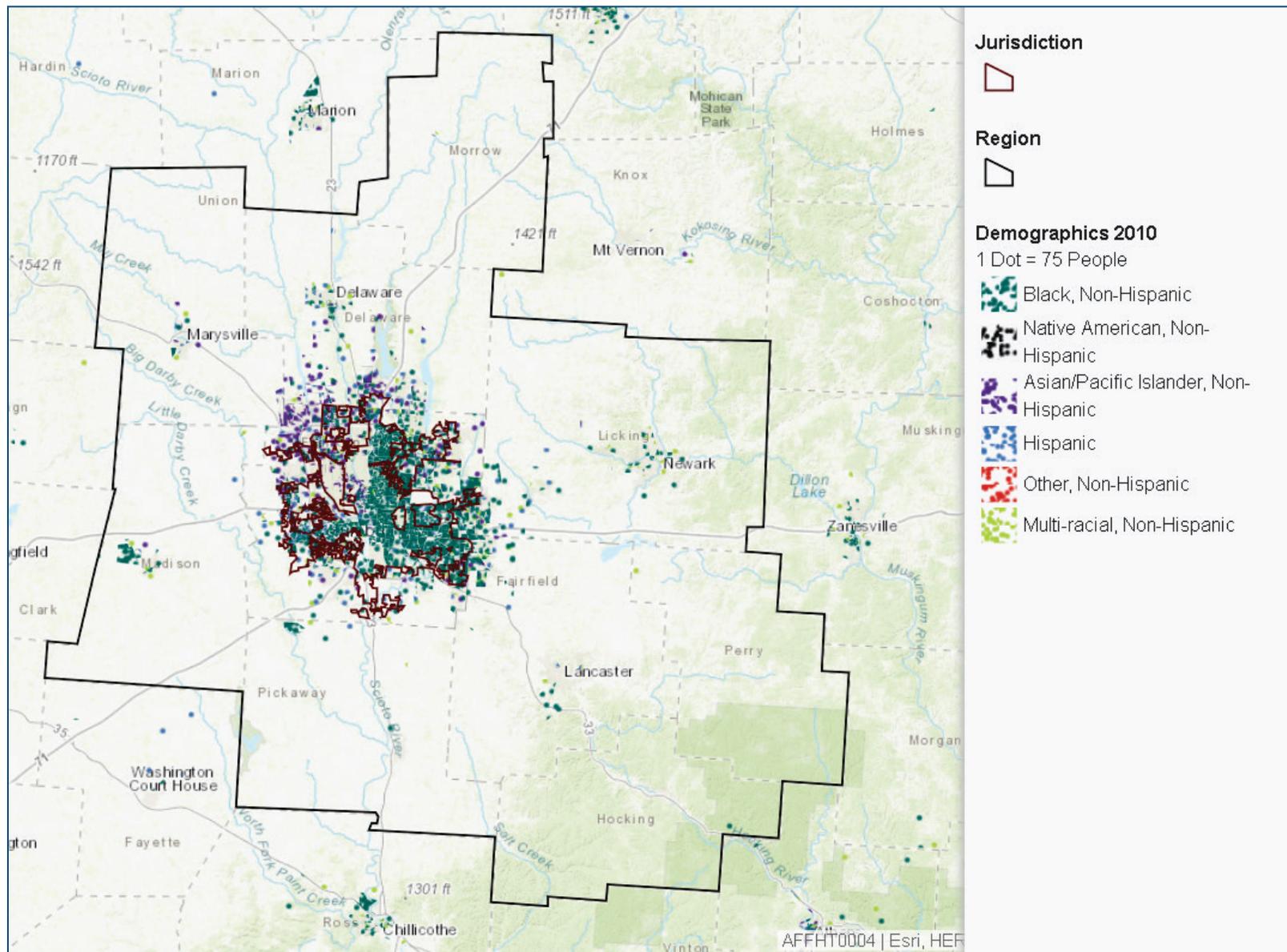


FIGURE 9. POPULATION BY RACE AND ETHNICITY IN THE COLUMBUS REGION (NON-WHITE POPULATION), 2010



NATIONAL ORIGIN AND LIMITED ENGLISH PROFICIENCY POPULATION

Settlement patterns of immigrants significantly impact the composition and landscape of communities across the United States. Large central cities have the largest population of foreign-born residents, but suburban areas are experiencing rapid growth of foreign-born populations recently.⁸ Clusters of immigrants of the same ethnicity form for a variety of reasons. Social capital in the form of kinship ties, social network connections, and shared cultural experiences often draw new immigrants to existing communities. Settling in neighborhoods with an abundance of social capital is less financially burdensome for immigrants and provides opportunities to accumulate financial capital through employment and other resources that would otherwise be unattainable.⁹

Populations with limited English proficiency (LEP) are typically composed of foreign-born residents that originate from countries where English is not the primary language, however, a substantial portion (19%) of the national LEP population is born in the United States. Nationally, the LEP population has lower levels of education and are more likely to live in poverty compared to the English proficient population.¹⁰ Recent studies have also found that areas with high concentrations of LEP residents have lower rates of homeownership.¹¹

Communities of people sharing the same ethnicity and informal networks are able to provide some resources and opportunities, but numerous barriers and limited financial capital influence residential patterns of foreign-born and LEP populations.

The foreign-born population is dispersed throughout Columbus, but there are some areas of concentration: those of East African origin in northeast Columbus, those of Mexican origin in western Columbus, and those of Indian descent in northwestern Columbus. A more diverse concentration of foreign-born population surrounds the Ohio State University.

Some of the same patterns are evident in the distribution of the city's population of residents with limited English proficiency (LEP). The population of East African origin in northeast Columbus speaks African languages, and the population of Mexican origin in west Columbus speaks Spanish. Two of the concentrations of foreign-born populations did not exhibit high LEP: those in the area around the Ohio State University and those of Indian origin in northwest Columbus.

⁸ James, F., Romine, J., & Zwanig, P. (1998). The Effects of Immigration on Urban Communities. *Cityscape*, 3(3), 171-192.

⁹ Massey, D. (1999). Why Does Immigration Occur?: A Theoretical Synthesis. In Hirschman C., Kasinitz P., & DeWind J. (Eds.), *Handbook of International Migration, The: The American Experience* (pp. 34-52). Russell Sage Foundation.

¹⁰ Zong, J. & Batalova, J. (2015). "The Limited English Proficient Population in the United States" *Migration Information Source*. Retrieved: <http://www.migrationpolicy.org/article/limited-english-proficient-population-united-states>

¹¹ Golding, E., Goodman, L., & Strochack, S. (2018). "Is Limited English Proficiency a Barrier to Homeownership." Urban Institute. Retrieved: <https://www.urban.org/research/publication/limited-english-proficiency-barrier-homeownership>

FIGURE 10. FOREIGN-BORN POPULATION BY NATIONALITY IN THE CITY OF COLUMBUS

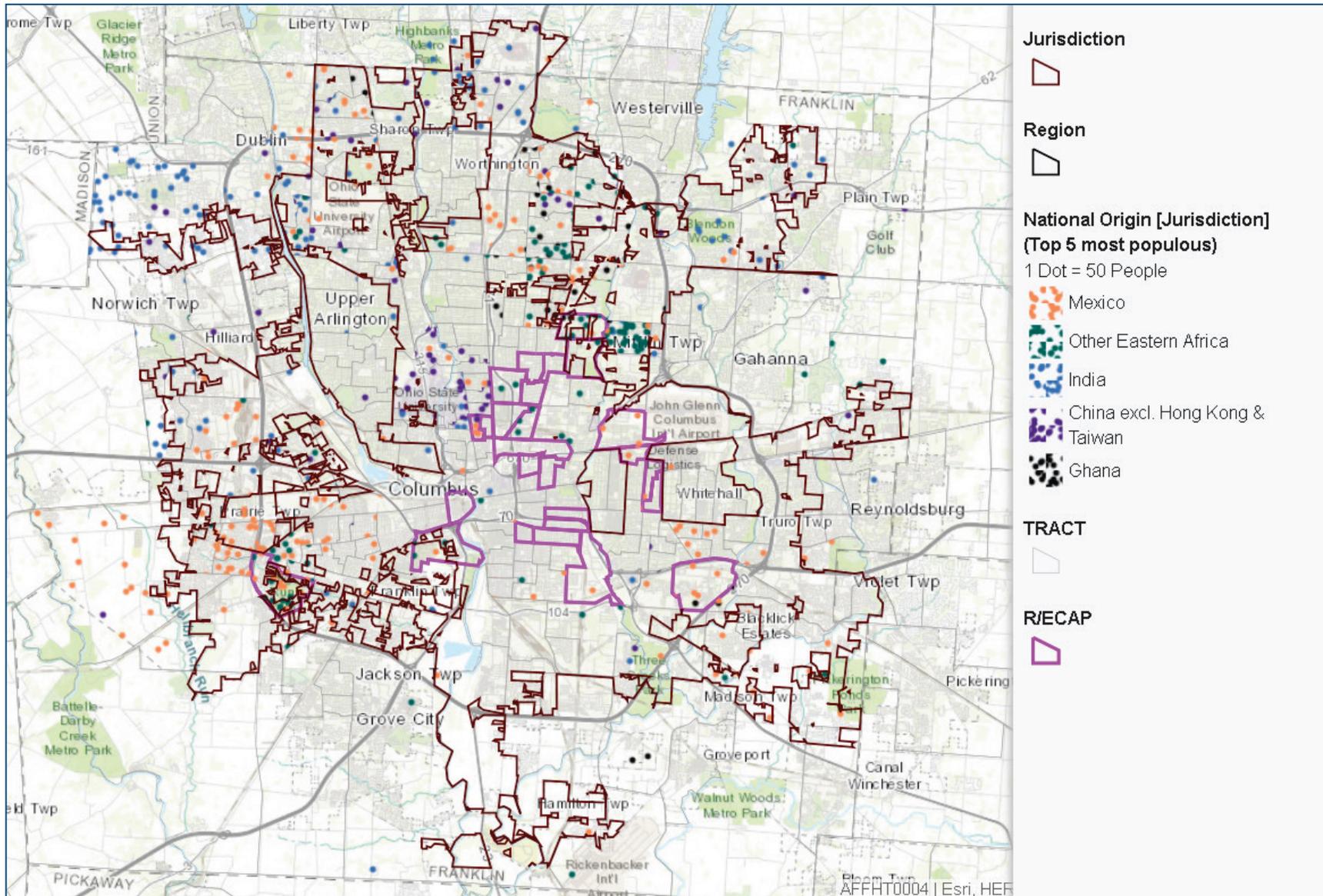
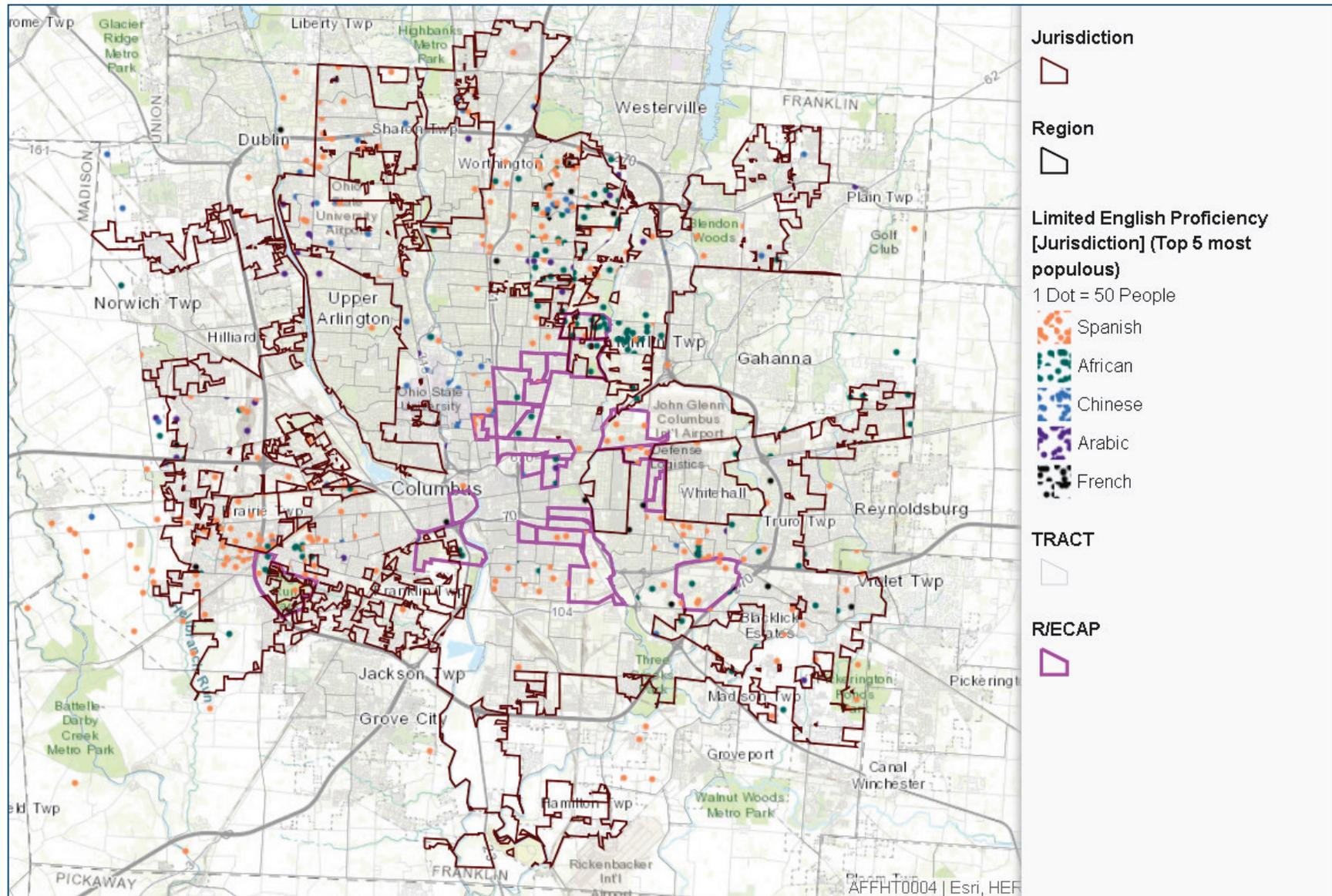


FIGURE 11. POPULATION WITH LIMITED ENGLISH PROFICIENCY IN THE CITY OF COLUMBUS



CHAPTER 5.

ACCESS TO OPPORTUNITY

Housing discrimination and residential segregation have limited access to opportunity for specific population groups and communities. It is important to understand opportunity, as used in this context, as a subjective quality. Typically, it refers to access to resources like employment, quality education, healthcare, childcare, and other services that allow individuals and communities to achieve a high quality of life. However, researchers who interviewed residents of Baltimore, Maryland on this subject found perceptions of opportunity follow similar themes but are prioritized differently by different groups. Racial and ethnic minorities, low-income groups, and residents of distressed neighborhoods identified job access, employment, and training as important opportunities while whites, higher income groups, and residents of wealthier neighborhoods more often identified sense of community, social connections among neighbors, freedom of choice, education, and retirement savings.¹²

Proximity is often used to indicate levels of access to opportunity, however, it would be remiss to consider proximity as the only factor in determining level of access. Access to opportunity is also influenced by social, economic, and cultural factors, thus making it difficult to accurately identify and measure. HUD conducted research regarding Moving to Opportunity for Fair Housing (MTO) to understand the impact of increased access to opportunity. Researchers found residents who moved to lower-poverty neighborhoods experienced safer neighborhoods and better health outcomes, but there was no significant change in educational outcomes, employment, or income.¹³ However, recent studies show the long-term effects of MTO on the educational attainment of children who were under the age of 13 are overwhelmingly positive with improved college attendance rates and higher incomes. On the other hand, children who were over the age of 13 show negative long-term impacts from MTO.¹⁴

The strategy to improve access to opportunities has been two-pronged with different housing and community development programs. Tenant-based housing vouchers allow mobility of recipients to locate in lower-poverty areas while programs like the Community Development Block Grant and Choice Neighborhoods Initiative provide funds to increase opportunities in disadvantaged neighborhoods.

¹² Lung-Amam, Willow S., et al. "Opportunity for Whom? The Diverse Definitions of Neighborhood Opportunity in Baltimore." *City and Community*, vol. 17, no. 3, 27 Sept. 2018, pp. 636-657, doi:10.1111/cico.12318.

¹³ *Moving to Opportunity for Fair Housing Demonstration Program: Final Impacts Evaluation*. U.S. Department of Housing and Urban Development, Office of Policy Development and Research, www.huduser.gov/portal/publications/pdf/MTOFHD_fullreport_v2.pdf.

¹⁴ Chetty, Raj, Nathaniel Hendren, and Lawrence F. Katz. 2016. "The Effects of Exposure to Better Neighborhoods on Children: New Evidence from the Moving to Opportunity Experiment." *American Economic Review*, 106 (4): 855-902. https://scholar.harvard.edu/files/hendren/files/mto_paper.pdf

OVERVIEW OF HUD-DEFINED OPPORTUNITY FACTORS

Among the many factors that drive housing choice for individuals and families are neighborhood factors including access to quality schools, jobs, and transit. To measure economic and educational conditions at a neighborhood level, HUD developed a methodology to quantify the degree to which a neighborhood provides such opportunities. For each block group in the U.S., HUD provides a score on several “opportunity dimensions,” including school proficiency, poverty, labor market engagement, jobs proximity, transportation costs, transit trips, and environmental health. For each block group, a value is calculated for each index and results are then standardized on a scale of 0 to 100 based on relative ranking within the metro area. For each opportunity dimension, a higher index score indicates more favorable neighborhood characteristics.

Average index values by race and ethnicity for the city, county, and region are provided in the table below for the total population and the population living below the federal poverty line. These values can be used to assess whether some population subgroups tend to live in higher opportunity areas than others, and will be discussed in more detail by opportunity dimension throughout the remainder of this chapter. The Opportunity Index Disparity measures the difference between the scores for the white non-Hispanic group and other groups. A negative score indicates that the particular subgroup has a lower score on that dimension than the white non-Hispanic group. A positive score indicates that the subgroup has a higher score than the white non-Hispanic Group.

Figures 13-24 map each of the opportunity dimensions along with demographic information such as race and ethnicity and include some supplemental maps.

TABLE 5 – DISPARITY IN ACCESS TO NEIGHBORHOOD OPPORTUNITY

Opportunity Dimension	Race and Ethnicity					Opportunity Index Disparity between White Non-Hispanic and Other Groups			
	Non-Hispanic				Hispanic	Non-Hispanic			Hispanic
	White	Black	Asian or Pacific Islander	Native American		Black	Asian or Pacific Islander	Native American	
City of Columbus – Total Population									
Low Poverty Index	51	25	58	34	36	-26	6	-17	-15
School Proficiency Index	36	18	44	25	28	-18	9	-11	-8
Labor Market Index	63	36	72	45	51	-27	9	-18	-12
Transit Index	50	50	52	51	51	0	1	1	1
Low Transportation Cost Index	71	71	74	72	73	0	3	1	2
Jobs Proximity Index	50	48	53	49	48	-2	3	-1	-2
Environmental Health Index	29	26	31	26	28	-3	1	-3	-2
City of Columbus – Population Below Federal Poverty Line									
Low Poverty Index	39	16	47	40	26	-23	8	1	-13
School Proficiency Index	24	13	31	26	23	-11	7	2	-1
Labor Market Index	49	27	61	53	43	-22	12	4	-6
Transit Index	55	53	57	53	53	-3	2	-2	-2
Low Transportation Cost Index	76	73	79	75	75	-3	3	-1	-1
Jobs Proximity Index	52	50	53	58	52	-2	1	6	0
Environmental Health Index	21	23	22	24	26	2	1	3	5

TABLE 5 – DISPARITY IN ACCESS TO NEIGHBORHOOD OPPORTUNITY (CONTINUED)

Opportunity Dimension	Race and Ethnicity					Opportunity Index Disparity between White Non-Hispanic and Other Groups			
	Non-Hispanic				Hispanic	Non-Hispanic			Hispanic
	White	Black	Asian or Pacific Islander	Native American		Black	Asian or Pacific Islander	Native American	
Franklin County – Total Population									
Low Poverty Index	70	50	77	58	54	-21	7	-12	-17
School Proficiency Index	61	43	73	49	45	-17	12	-12	-15
Labor Market Index	76	57	86	63	62	-19	10	-13	-15
Transit Index	41	43	42	41	44	2	1	0	3
Low Transportation Cost Index	59	63	61	61	65	4	2	2	6
Jobs Proximity Index	50	53	52	51	54	3	2	2	4
Environmental Health Index	40	35	45	38	34	-5	4	-2	-6
Franklin County – Population Below Federal Poverty Line									
Low Poverty Index	54	35	66	65	31	-19	12	11	-23
School Proficiency Index	47	35	62	37	30	-12	15	-11	-17
Labor Market Index	61	45	77	75	43	-15	16	15	-18
Transit Index	43	44	46	42	47	1	3	-1	3
Low Transportation Cost Index	62	66	66	63	70	4	4	1	8
Jobs Proximity Index	51	56	49	47	55	5	-1	-3	4
Environmental Health Index	36	34	37	37	29	-2	1	1	-6

TABLE 5 – DISPARITY IN ACCESS TO NEIGHBORHOOD OPPORTUNITY (CONTINUED)

Opportunity Dimension	Race and Ethnicity					Opportunity Index Disparity between White Non-Hispanic and Other Groups			
	Non-Hispanic				Hispanic	Non-Hispanic			Hispanic
	White	Black	Asian or Pacific Islander	Native American		Black	Asian or Pacific Islander	Native American	
Columbus Region – Total Population									
Low Poverty Index	60	31	67	46	44	-28	7	-13	-16
School Proficiency Index	53	25	59	42	37	-28	5	-11	-16
Labor Market Index	63	41	78	50	55	-22	15	-12	-8
Transit Index	36	47	45	39	46	11	8	3	10
Low Transportation Cost Index	54	68	65	58	67	14	10	4	13
Jobs Proximity Index	51	49	53	50	50	-2	3	0	-1
Environmental Health Index	47	30	39	42	34	-17	-8	-5	-13
Columbus Region – Population Below Federal Poverty Line									
Low Poverty Index	43	19	50	41	29	-24	7	-2	-14
School Proficiency Index	39	17	37	39	28	-22	-3	0	-12
Labor Market Index	48	30	63	52	43	-18	16	5	-4
Transit Index	41	51	54	42	50	10	12	0	8
Low Transportation Cost Index	60	72	75	64	72	11	15	4	11
Jobs Proximity Index	51	51	53	58	53	-1	2	7	2
Environmental Health Index	39	25	26	37	29	-14	-12	-1	-9

Data Sources: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA

EDUCATION

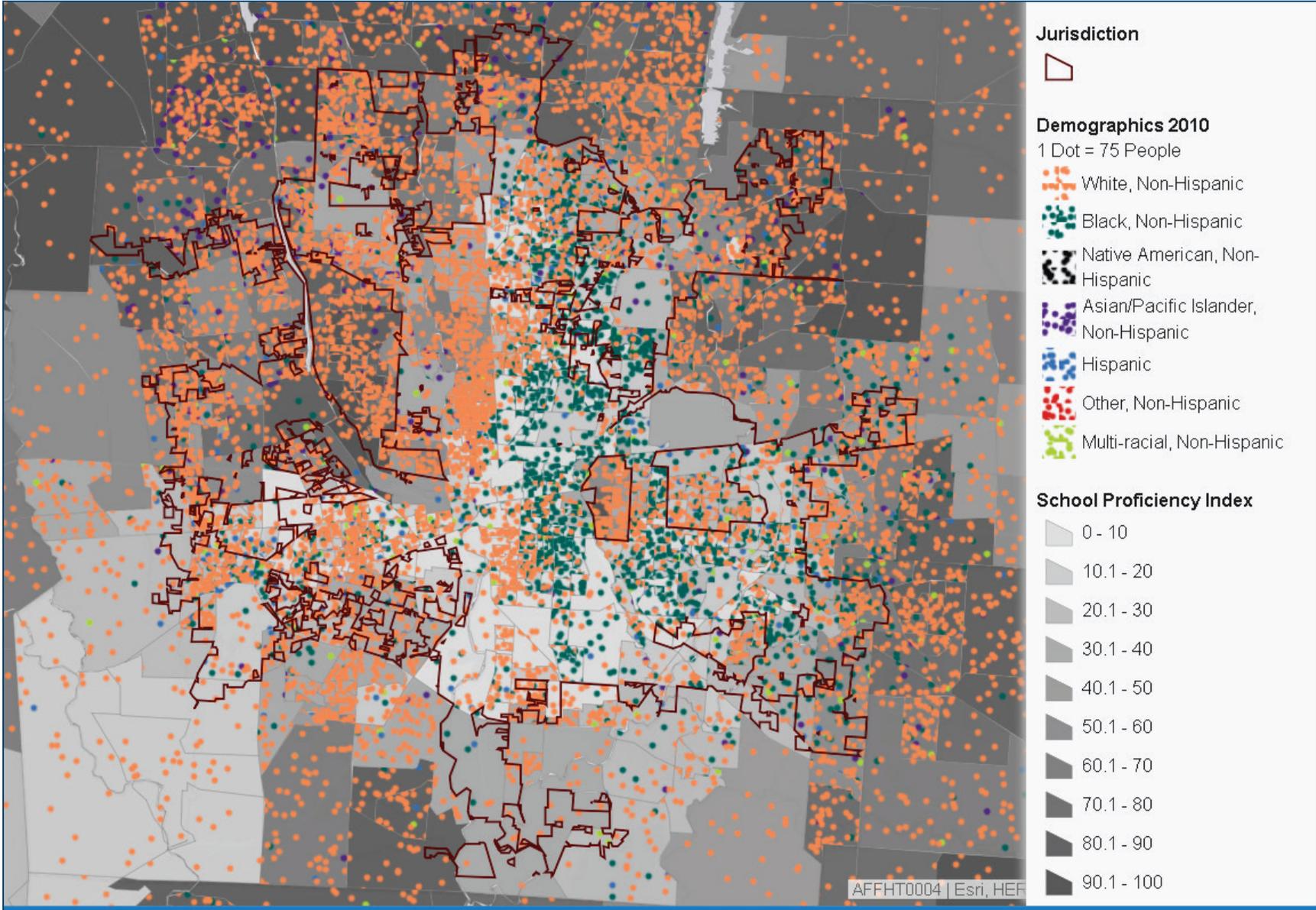
School proficiency is an indication of the quality of education that is available to residents of an area. High quality education is a vital community resource that can lead to more opportunities and improve quality of life. HUD's school proficiency index is calculated based on performance of 4th grade students on state reading and math exams. For each block group, the index is calculated using test results in up to the three closest schools within 1.5 miles.

The map on the following page shows HUD-provided opportunity scores related to education for block groups in the study area, along with the demographic indicators of race/ethnicity. In each map, lighter shading indicates areas of lower opportunity and darker shading indicates higher opportunity.

Figure 13 shows that the lowest-performing schools are located in Columbus's central city, which highly corresponds with the concentration of African American population. Areas with best access to proficient schools are at the edge or just outside of the city limits.

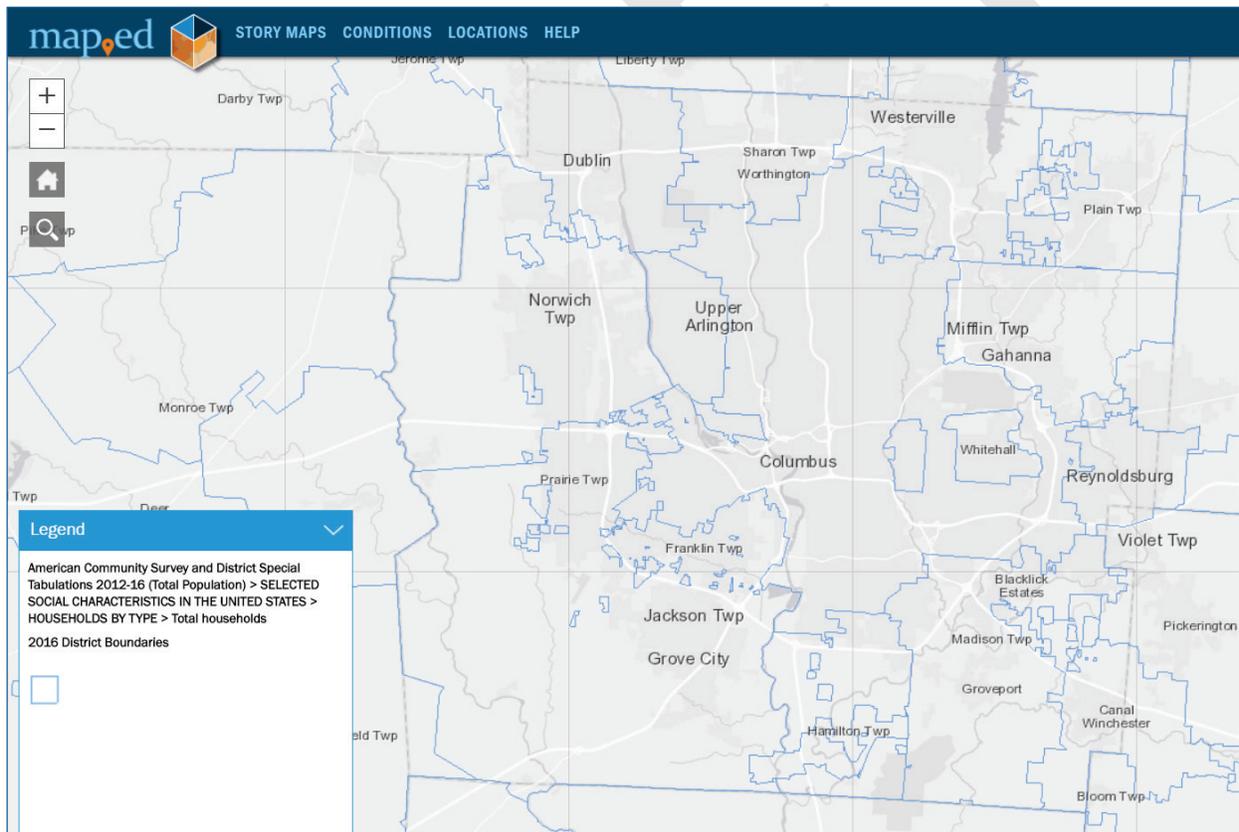
The data in the above table show that all groups in Columbus have relatively poor access to proficient schools, with scores ranging from 18 for African Americans to 44 for Asian Americans. Except for Asian Americans, all other non-white groups have less access to proficient schools than whites. For the population below the poverty line, scores generally decrease except for Native Americans, whose score increases by a point. The difference between whites and non-whites is less pronounced below the poverty line, and Native Americans actually score two points higher than whites. In Franklin County, scores are markedly higher than in the city of Columbus, ranging from 43 for African Americans to 73 for Asian Americans. As in the City, whites follow Asians with the second-best access. For the population below the poverty line, scores decline for all groups.

FIGURE 12. SCHOOL PROFICIENCY INDEX IN THE CITY OF COLUMBUS



A complexity not reflected in HUD’s data on the school proficiency index is the fact that Franklin County is served by 16 individual school districts, some of those extending into other neighboring counties (e.g. Canal Winchester, Dublin, and Westerville) and some wholly within other, larger districts (e.g. Bexley and Whitehall). This complicated patchwork can make it difficult for new residents and prospective homebuyers to determine areas with access to the schools they desire. It can also result in great disparities from one block to the next in the performance and demographic composition of a student’s school. A 2016 article in *Governing* magazine drew on the example of Bexley City Schools as an “island district... characterized by stark socioeconomic disparities compared to [its] larger neighboring district.”¹⁵ The research published in *Governing* found that the student poverty rate for Bexley City Schools was only 9.3% compared to 38.3% in the surrounding Columbus City School district and that Bexley spent approximately \$2,000 more per pupil than Columbus.

FIGURE 13. 2016 SCHOOL DISTRICT BOUNDARIES



Source: National Center for Education Statistics

Another unique and important factor of opportunity related to school proficiency in the Columbus region are what are known locally as “win-win areas”. In the 1960s and 1970s, the City of Columbus implemented ambitious annexation plans, extending the city limits far into suburban areas of Franklin County. As these

¹⁵ Maciag, Mike. 'Island' School Districts: A Story of Haves and Have Nots. *Governing*, August 2016. <http://www.governing.com/topics/education/gov-island-school-districts.html>.

areas were incorporated into the City of Columbus, many families residing in the annexed areas resisted subsequent attempts by Columbus City Schools to claim the annexed areas for its school district, preferring instead to keep their children enrolled in their suburban school districts. A win-win compromise known formally as the Joint Agreement Among and Between the Boards of Education of Certain School Districts in Franklin County, Ohio was achieved in 1986 that allowed students in certain areas annexed by Columbus to remain in the associated suburban school district.¹⁶ In exchange, the suburban school districts agreed to each pay Columbus City Schools a percentage of their growth in property tax revenue derived from property included in Columbus's pre-1986 annexations.¹⁷ Initial parties to the agreement included Columbus City Schools and the districts of Canal Winchester, Groveport Madison, Hamilton Local, Gahanna-Jefferson, New Albany-Plain, Westerville, Dublin, Hilliard, South-Western, and Reynoldsburg.

The resulting win-win areas scattered throughout Franklin County are within the city limits of Columbus and receive City of Columbus services, but are zoned for a school district other than Columbus City Schools. Given – fairly or not – the often negative public perceptions of the quality of Columbus City Schools, these win-win areas are prized by many school-aged families as the best of both worlds: access to rich city services and high-quality suburban schools.

¹⁶ New Albany-Plain Local Schools. *History of the Win-Win Agreement*, <https://www.napls.us/Page/376>.

¹⁷ The Columbus Dispatch. *Win-Win Q&A: Agreement was Created to Avoid Poaching Students*, May 28, 2016. <https://www.dispatch.com/content/stories/local/2016/05/29/win-win-qampa-agreement-was-created-to-avoid-poaching-students.html>.

EMPLOYMENT

Neighborhoods with jobs in close proximity are often assumed to have good access to jobs. However, distance alone does not capture any other factor such as transportation options, the type of jobs available in the area, or the education and training necessary to obtain them. There may be concentrations of jobs and low-income neighborhoods in urban centers, but many of the jobs are unattainable for residents of low-income neighborhoods. Therefore, this section analyzes both the labor market engagement and jobs proximity indices which, when considered together, offer a better indication of how accessible jobs are for residents of a specific area.

The Jobs Proximity Index measures the physical distance between place of residence and job locations. The Labor Market Engagement Index is based on unemployment rate, labor force participation rate, and the percent of the population age 25 and over with a bachelor's degree or higher. Again, lighter shading indicates areas of lower opportunity and darker shading indicates higher opportunity.

Figure 14 maps the Jobs Proximity Index and shows the best access to jobs in the central city of Columbus. Similarly, Figure 15 maps the Labor Market Engagement and also shows the poorest engagement in Columbus's central city. This indicates that despite the proximity of jobs, the population in these areas, which is predominately African American, is unable to access these jobs.

The above table shows a similar pattern for both Jobs Proximity and Labor Market Engagement. In Columbus, Asian Americans have the highest score on both, followed by whites, Native Americans, and Hispanics. The difference between groups is less pronounced for Job Proximity than for Labor Market Engagement. African Americans have better proximity to jobs than they do engagement, as Figures 14 and 15 indicate.

For the city's population below the poverty line, scores are flat or even increase for Jobs Proximity. However, Labor Market Engagement scores decline for all groups except Native Americans. African Americans below the poverty line have the poorest Labor Market Engagement, scoring 27, while Asian Americans score the highest, 61. Unlike in the overall population, below the poverty line, Native Americans score higher than whites.

In Franklin County, the Labor Market Engagement index produces similar results to those of the City: Asians score highest, making them the group most likely to live in neighborhoods with high levels of labor market participation. Asians are followed by whites, Native Americans, Hispanics, and Black residents. Scores for jobs proximity in the county are lower, with a much smaller degree of disparity. All groups range between 54 (Latinos) and 50 (whites). Because proximity to employment centers is generally better within Columbus than in the county, county residents, regardless of race or ethnicity, have overall lower levels of opportunity along this dimension.

FIGURE 14. JOBS PROXIMITY INDEX IN THE CITY OF COLUMBUS

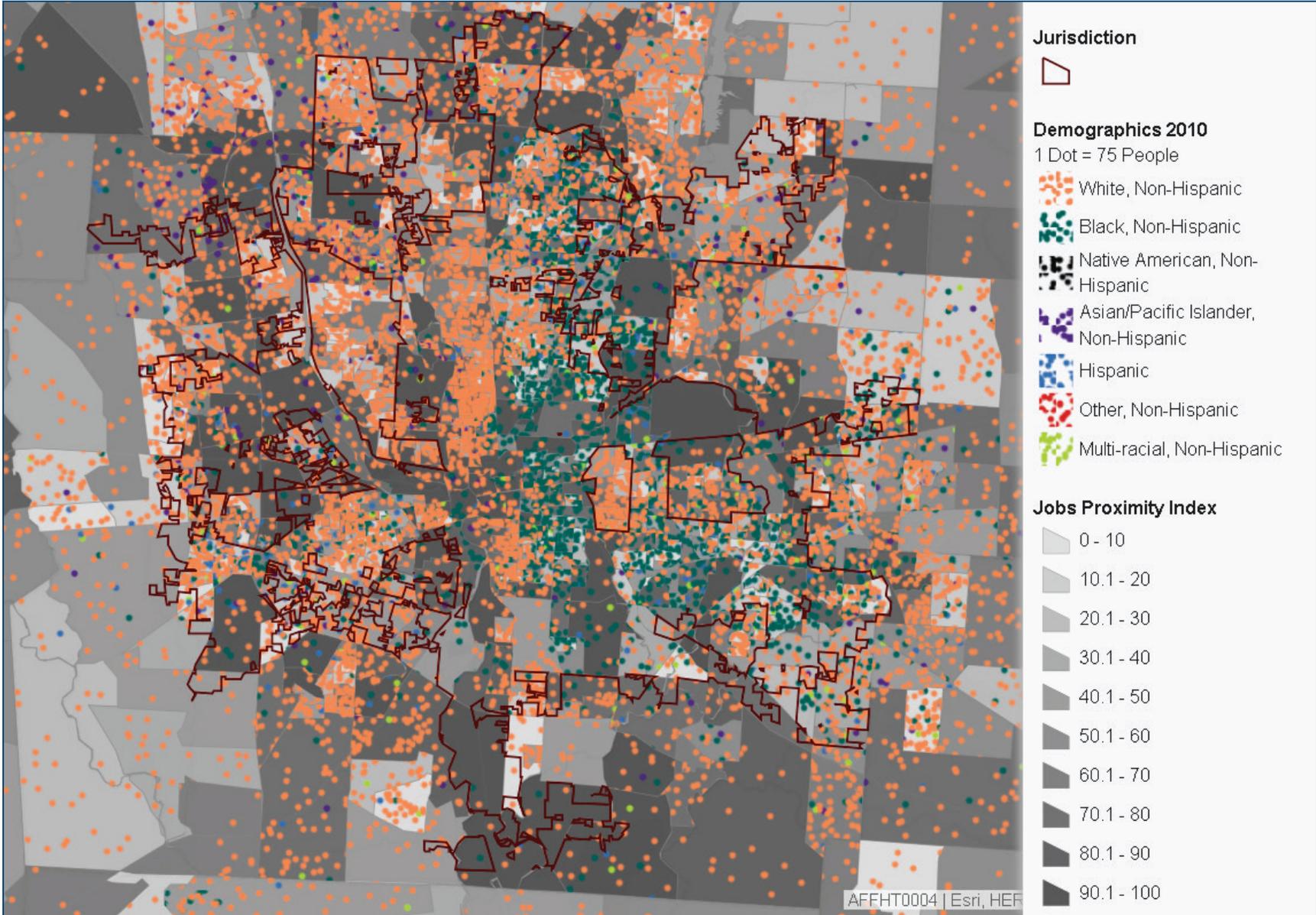
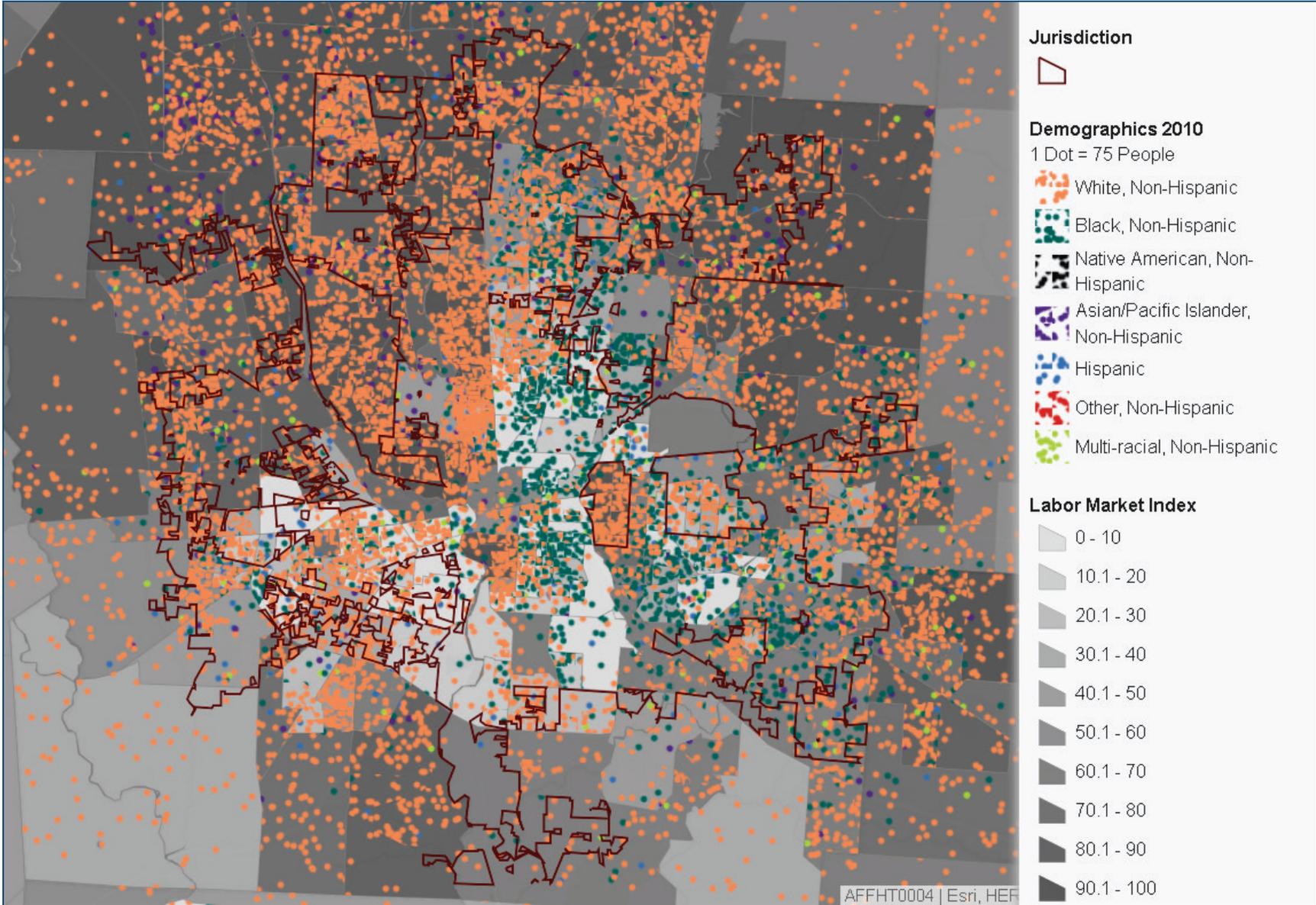


FIGURE 15. LABOR MARKET INDEX IN THE CITY OF COLUMBUS



TRANSPORTATION

The Transit Trip Index measures how often low-income families in a neighborhood use public transportation, while the Low Transportation Cost Index measures the cost of transport and proximity to public transportation by neighborhood. The higher the Low Transportation Cost Index, the lower the cost of transportation in that block group. Again, lighter shading indicates areas of lower opportunity and darker shading indicates higher opportunity.

Figure 16 shows moderate transit usage throughout the city limits, with diminishing levels of use extending outside Columbus into Franklin County. There is more variability in access for the Columbus region overall, as rural areas have less transit usage.

The data in the table above show moderate transit usage across all groups with little variation either above or below the poverty line. At the county level, the same trend holds true, but index values across the board are roughly 10 points lower than for the same population in the city.

Figure 17 shows fairly low transportation costs throughout the Columbus city limits. Costs increase somewhat outside the city in Franklin County.

The data in the above table show that transportation costs vary little across all groups both above and below the poverty line, with Asian Americans having slightly lower transportation costs than other groups. Within the region, both above and below the poverty line, Native Americans and whites have the lowest transportation costs, and other groups have noticeably higher transportation costs.

FIGURE 16. TRANSIT TRIPS INDEX IN THE CITY OF COLUMBUS

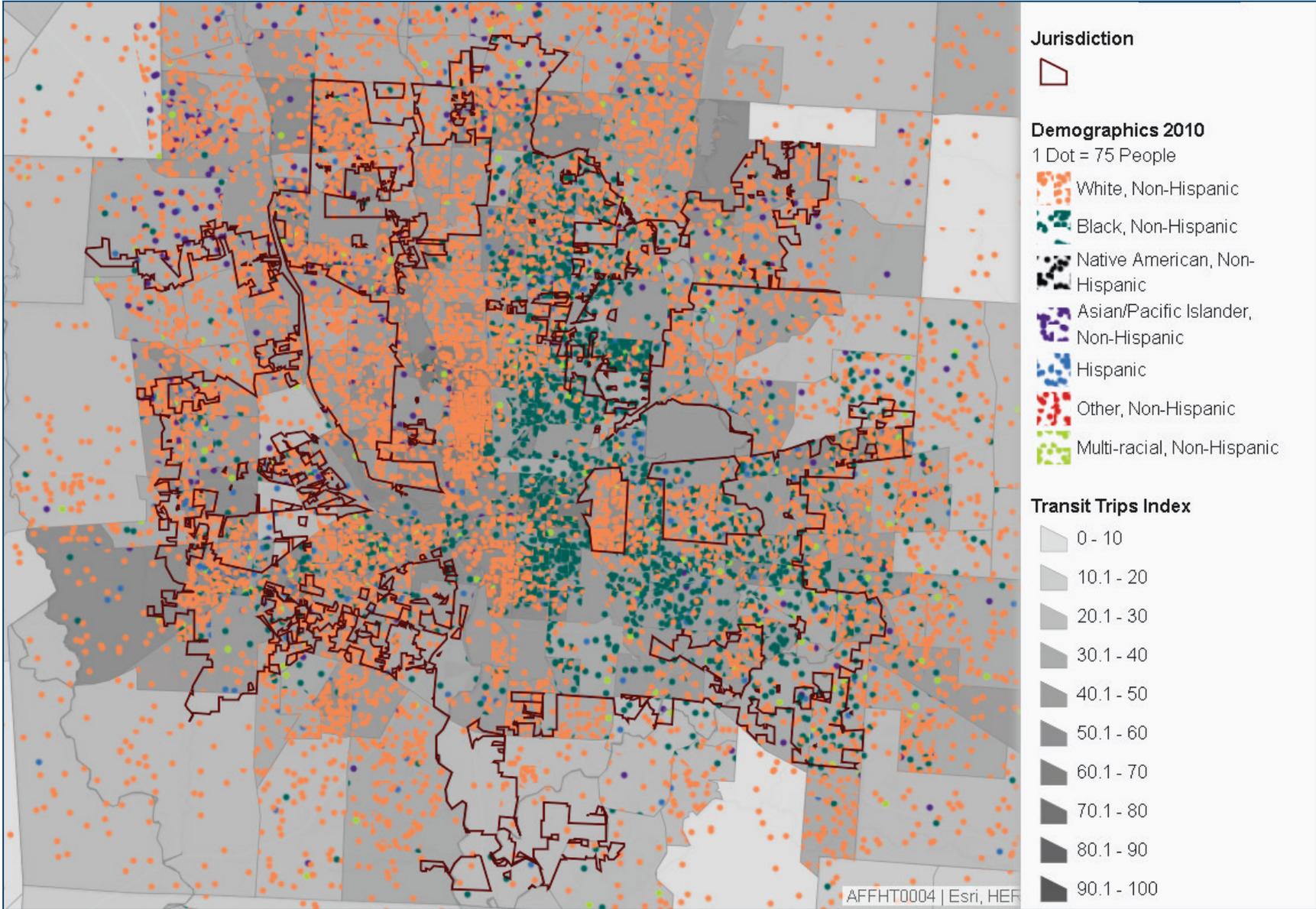
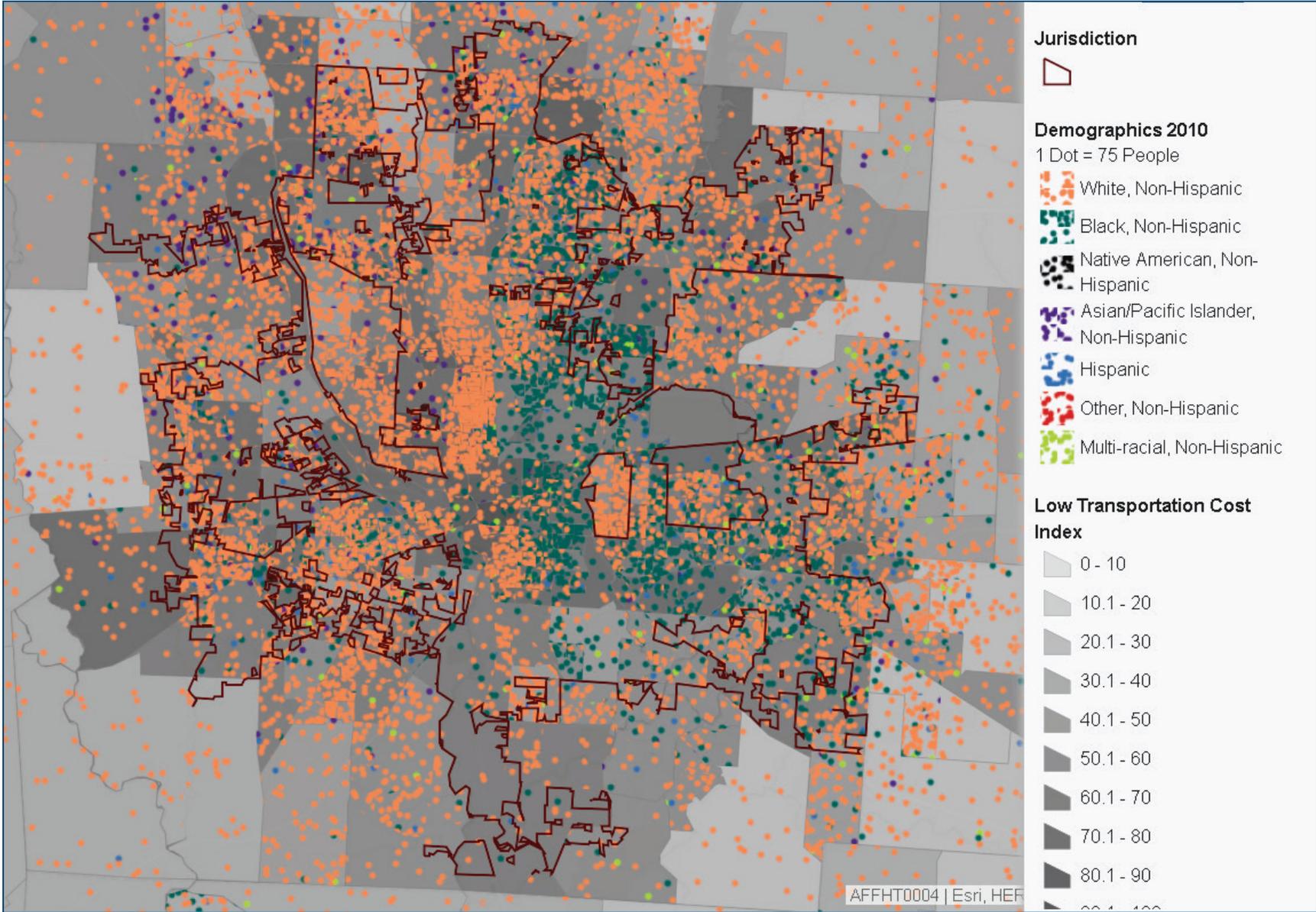


FIGURE 17. LOW TRANSPORTATION COST INDEX IN THE CITY OF COLUMBUS



Walk Score measures the walkability of any address by analyzing hundreds of walking routes to nearby amenities using population density and road metrics such as block length and intersection density. Data sources include Google, Education.com, Open Street Map, the U.S. Census, Localeze, and places added by the Walk Score user community.

Points are awarded based on the distance to amenities in several categories including grocery stores, parks, restaurants, schools, and shopping. Not only is the measure useful for showing walkability but also access in general to critical facilities. The map for Columbus shows the highest scores running north and south along High Street, with other high-scoring areas near Ohio State and in the neighborhoods east of downtown.

FIGURE 18. WALKABILITY IN THE CITY OF COLUMBUS

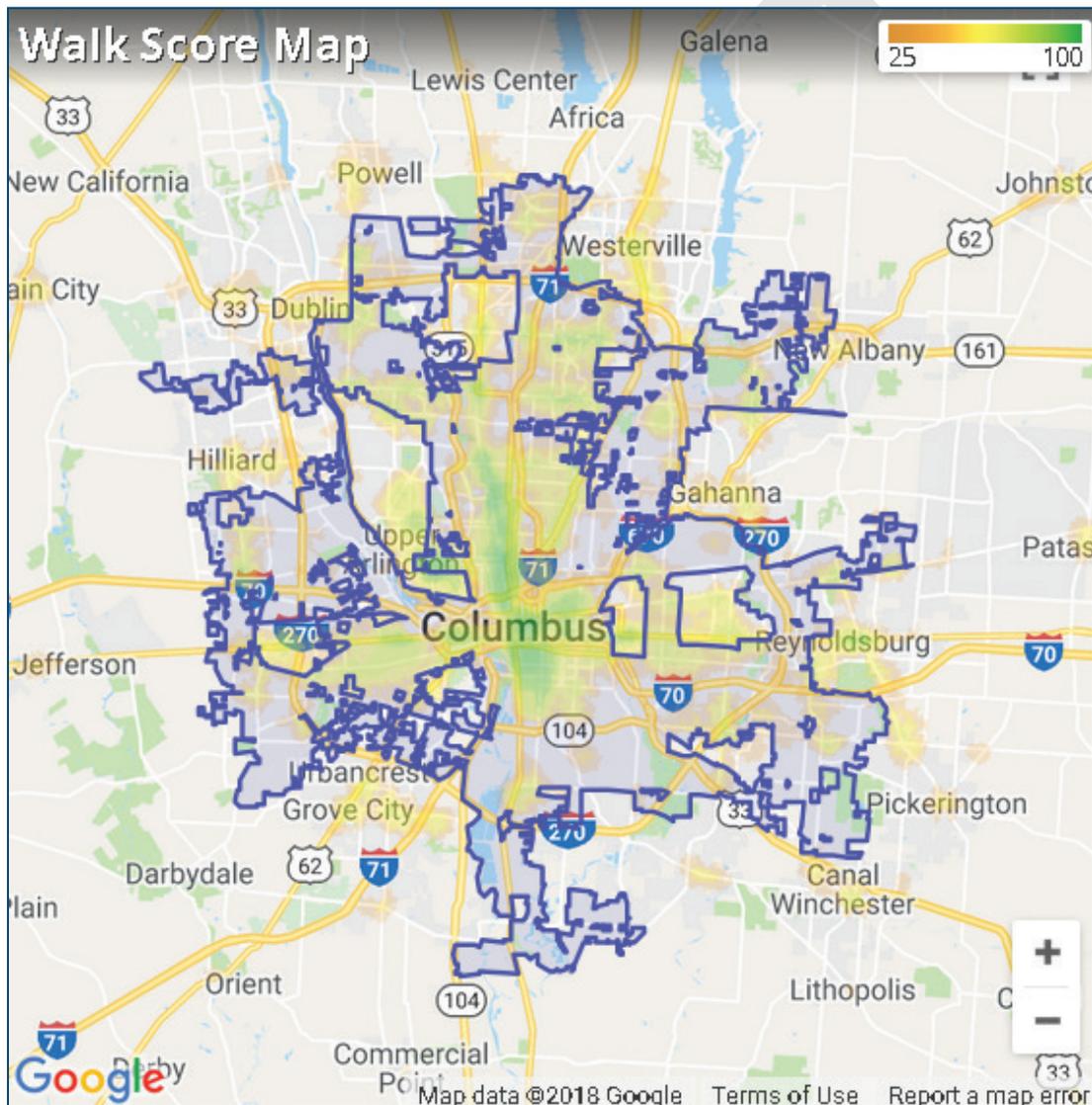
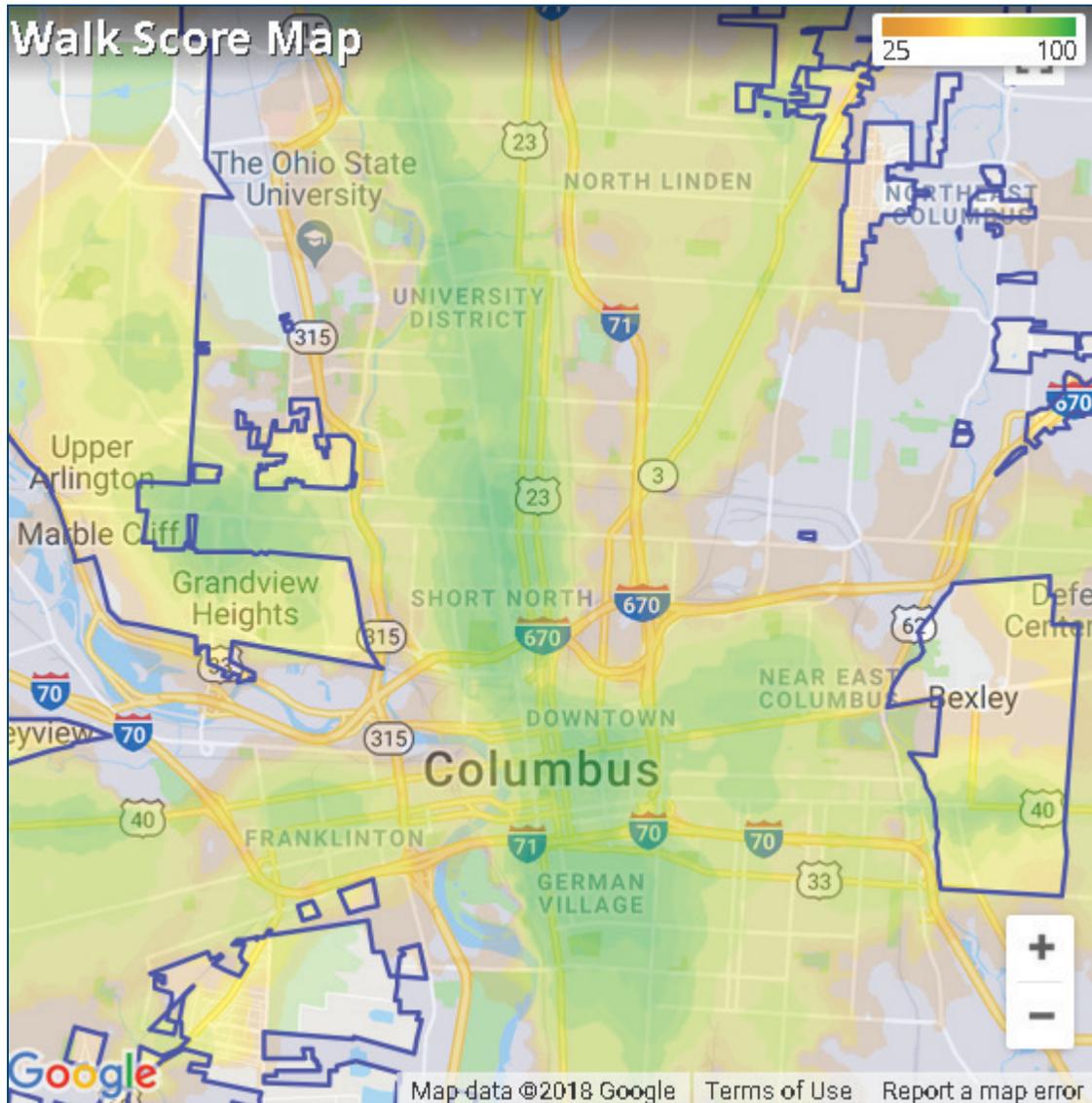


FIGURE 19. WALKABILITY IN THE CITY OF COLUMBUS, CENTRAL CITY



Source: Walkscore, Retrieved from: https://www.walkscore.com/ID/Hot_Springs

POVERTY

Residents in high poverty areas tend to have lower levels of access to opportunity due to the absence of critical resources and disinvestment in their communities. As poverty increases, disparities in access to opportunities often increase among population groups and disadvantaged communities become even more isolated. HUD's Low Poverty Index uses family poverty rates (based on the federal poverty line) to measure exposure to poverty by neighborhood. Lighter shading indicates areas of higher levels of poverty and darker shading indicates lower levels of poverty.

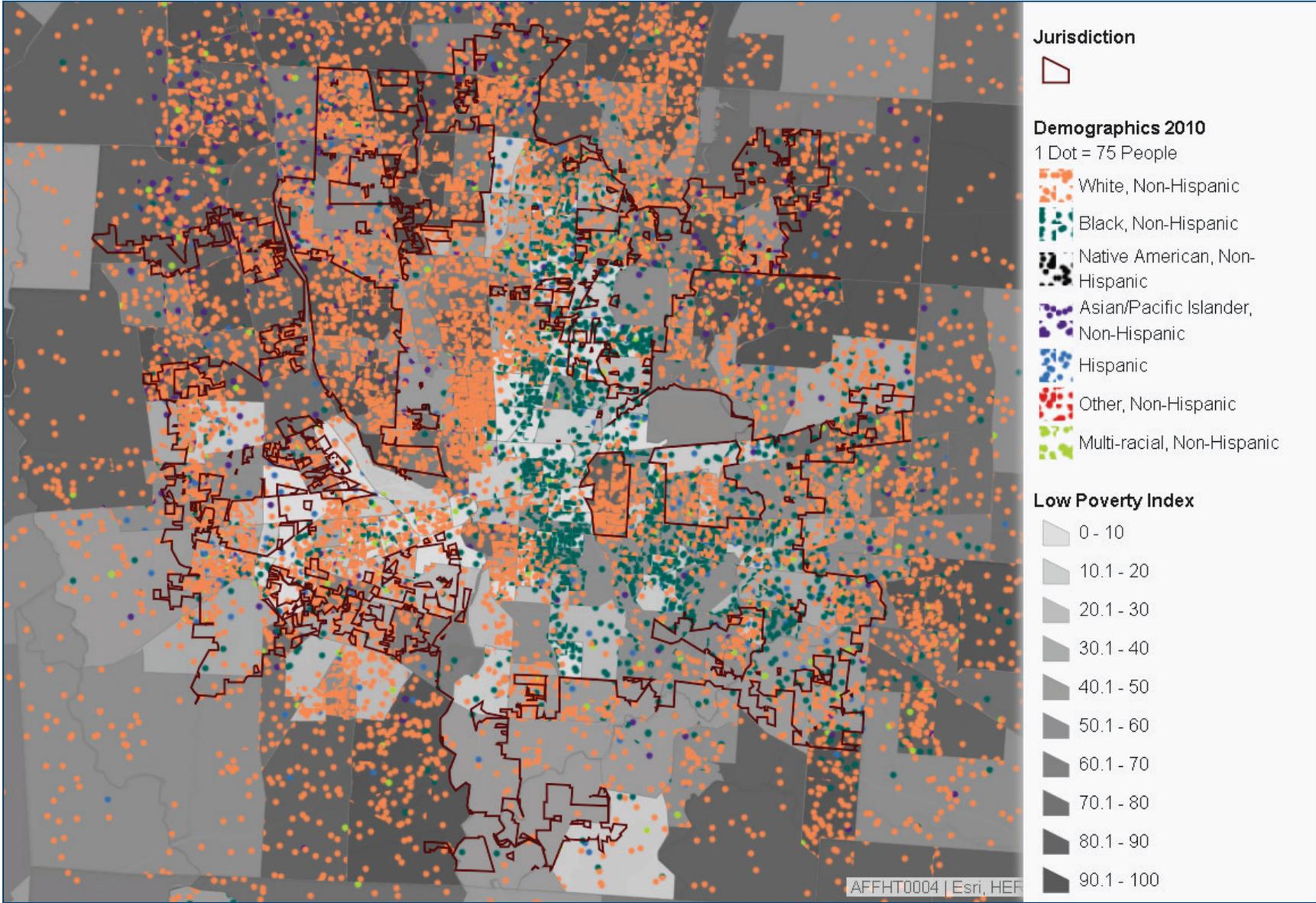
Table 5 shows that within Columbus, scores range from 25 for African Americans to 58 for Asian Americans. Whites score significantly higher than both Native Americans and Hispanics. Below the poverty line, scores generally decline, and a similar pattern exists with one notable exception: Native Americans' score increases, and they score slightly higher than whites.

Within the county, scores increase for all groups, and the same pattern exists as in the city, with Asian Americans having the highest scores, African Americans the lowest, and whites significantly higher than both Native Americans and Hispanics. Below the poverty line, scores decline although Native Americans' score declines less than other groups.

The map that follows uses HUD's 2017 estimates of the number of low- and moderate-income individuals by block group to show the share of the population within each block group with low or moderate incomes (i.e., under 80% of area median income). Darker shading indicates lower shares of low- and moderate-income population and lighter shading indicates a higher share of low- and moderate-income individuals.

Several concentrated areas of poverty are clear on the map. One is located in the central city area and immediately east, roughly corresponding to the area of high African American population. Another is located in the southwestern area of the city, which is more racially diverse.

FIGURE 20. LOW POVERTY INDEX



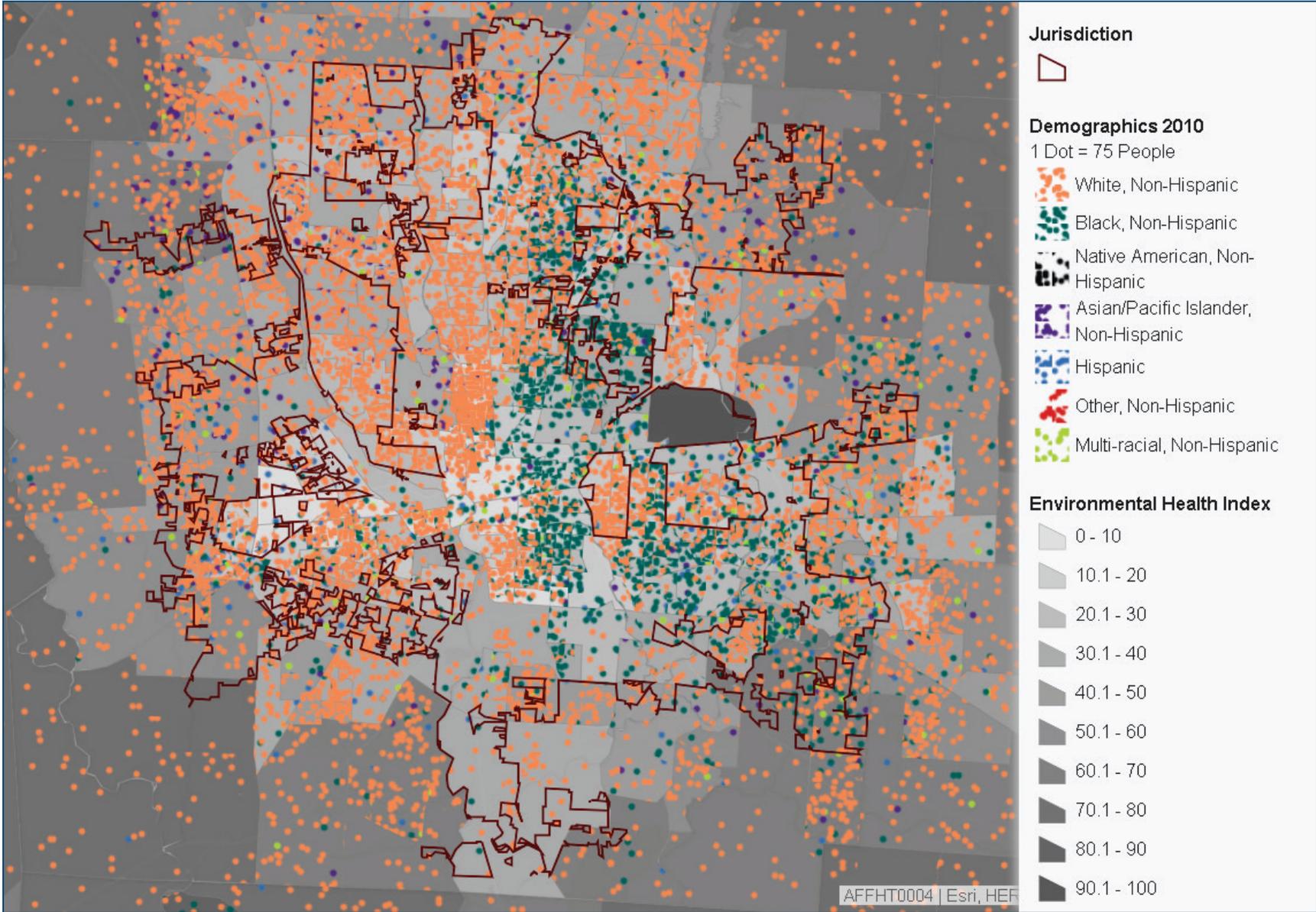
ENVIRONMENTAL HEALTH

HUD's Environmental Health Index measures exposure based on EPA estimates of air quality (considering carcinogenic, respiratory, and neurological toxins) by neighborhood. The index only measures issues related to air quality and not other factors impacting environmental health. Lighter shading indicates areas of lower opportunity and darker shading indicates higher opportunity.

Figure 22 shows that air quality is significantly lower in central Columbus and generally improves as distance from downtown increases. There is also an area of lower air quality in the west, near the intersection of interstates 70 and 270.

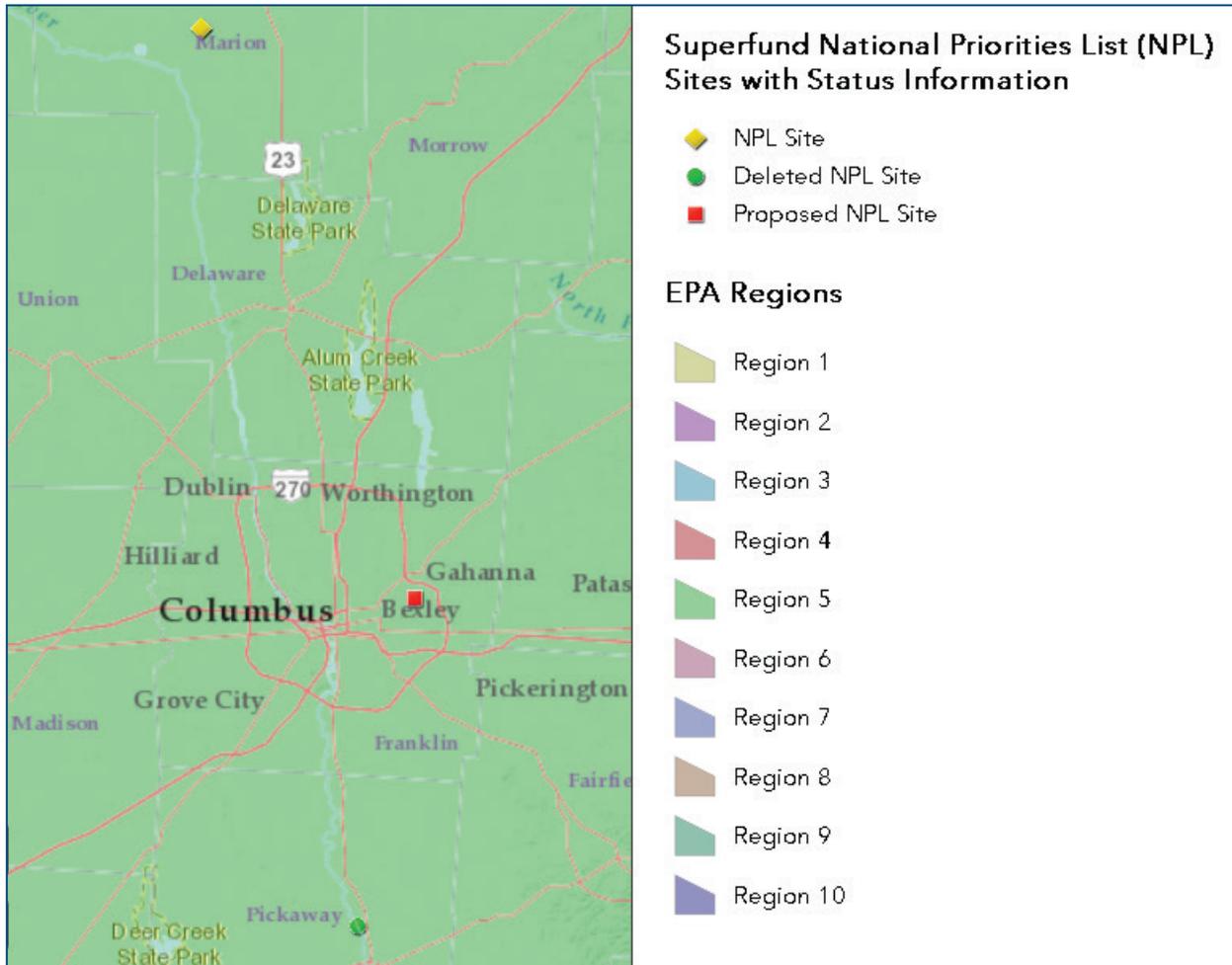
Table 5 shows that within the city, the Environmental Health Index scores are low across all groups. Asian Americans have slightly higher index scores than other groups. Below the poverty line, scores decrease for all groups, but most markedly for whites, whose index value is the lowest of all groups. Within Franklin County, scores are significantly higher. Both above and below the poverty line, Asians live in the areas with the best air quality, and Latinos live in the areas with the poorest.

FIGURE 21. ENVIRONMENTAL HEALTH INDEX IN THE CITY OF COLUMBUS



A Superfund site is any land in the United States that has been contaminated by hazardous waste and identified by the EPA as a candidate for cleanup because it poses a risk to human health and/or the environment. These sites are placed on the National Priorities List (NPL). There is a proposed Superfund site located just outside Columbus near John Glen Columbus International Airport.

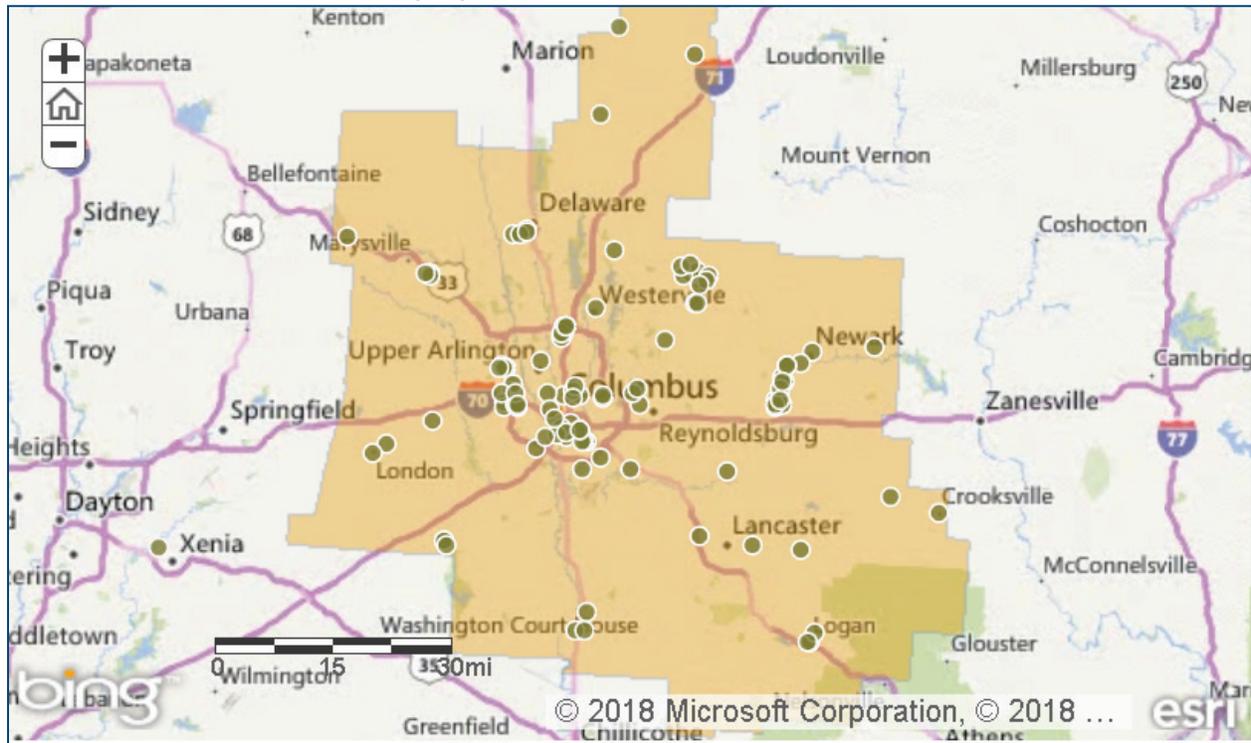
FIGURE 22. SUPERFUND NATIONAL PRIORITIES LIST (NPL) SITES IN THE CITY OF COLUMBUS AREA



Source: Environmental Protection Agency GIS Data,
Retrieved from: <https://www.epa.gov/superfund/search-superfund-sites-where-you-live>

The Toxic Release Inventory (TRI) tracks the management of certain toxic chemicals that may pose a threat to human health and the environment. Certain industrial facilities in the U.S. must report annually how much of each chemical is recycled, combusted for energy recovery, treated for destruction, and disposed of or otherwise released on- and off-site. This information is collectively referred to as production-related waste managed. Most release sites in Columbus are located in the central city area, with somewhat fewer sites north of downtown than other areas.

FIGURE 23. TOXIC RELEASE INVENTORY (TRI) IN THE CITY OF COLUMBUS



Source: Environmental Protection Agency GIS Data,
Retrieved from: <https://iaspub.epa.gov/triexplorer/msa.html?pYear=2016&pParent=NAT&pLoc=190>

SUMMARY

The previous sections detail the following findings. All groups in Columbus have relatively poor access to proficient schools, but Asian Americans and whites have the best access, and access is considerably better in the county.

The city and county have moderate job access and engagement, with the Jobs Proximity Index showing the best access to jobs in Columbus’s central city but the poorest engagement in that location. This indicates that despite the proximity of jobs, the population in these areas, which is predominately African American, is unable to access these jobs. Asian Americans have the best job proximity and engagement, followed by whites, Native Americans, and Hispanics.

Columbus shows moderate transit usage and relatively low transportation costs across all groups with little variation either above or below the poverty line. In Franklin County, costs increase somewhat, and whites and Native Americans have somewhat less transit usage than other groups, both above and below the poverty line.

African Americans are significantly more likely to live in areas of poverty than other groups. Native Americans and Hispanics are also more likely, though less so than African Americans. Several concentrated areas of poverty are clear, one in the central city area and immediately east, roughly corresponding to the area of high African American population. Another is located in the more racially diverse southwestern portion of Columbus. The Environmental Health Index is low for all groups, though the scores are consistent.

Several indicators have similar patterns. Asians-Americans tend to live in areas with higher scores on many opportunity dimensions, followed most often by whites. Other racial and ethnic groups tend to live in areas with lower levels of opportunity and have lower scores; African Americans often live in the areas with the lowest levels of opportunity. This pattern exists within the city for Low Poverty, School Proficiency, Labor Market, Jobs Proximity, and Environmental Health. Below the poverty line, Native Americans' scores unexpectedly increase relative to other groups for all Indices except for Environmental Health.

Within the county there are generally similar patterns with some exceptions. For example, Hispanics and Native Americans had slightly higher scores on Jobs Proximity. In other cases, while the general pattern of disparities followed that of the corresponding population groups in Columbus, the overall level of access to opportunity was lower (Transit Index) or higher (Environmental Health Index).

CHAPTER 6.

HOUSING PROFILE

The availability of quality affordable housing plays a vital role in ensuring housing opportunities are fairly accessible to all residents. On the surface, high housing costs in certain areas are exclusionary based solely on income. But the disproportionate representation of several protected class groups in low and middle income levels can lead to unequal access to housing options and neighborhood opportunity in high-cost housing markets. Black and Hispanic residents, immigrants, people with disabilities, and seniors often experience additional fair housing barriers when affordable housing is scarce.

Beyond providing fair housing options, the social, economic, and health benefits of providing quality affordable housing are well-documented. National studies have shown affordable housing encourages diverse, mixed-income communities, which result in many social benefits. Affordable housing also increases job accessibility for low and middle income populations and attracts a diverse labor force critical for industries that provide basic services for the community. Affordable housing is also linked to improvements in mental health, reduction of stress, and decreased cases of illnesses caused by poor-quality housing.¹⁸ Developing affordable housing is also a strategy used to prevent displacement of existing residents when housing costs increase due to economic or migratory shifts.

Conversely, a lack of affordable housing eliminates many of these benefits and increases socioeconomic segregation. High housing costs are linked to displacement of low-income households and an increased risk of homelessness.¹⁹ Often lacking the capital to relocate to better neighborhoods, displaced residents tend to move to socioeconomically disadvantaged neighborhoods where housing costs are most affordable.²⁰

AFFORDABILITY AND HOUSING NEED

Housing cost and condition are key components to housing choice. Housing barriers may exist in a jurisdiction when some protected class groups have greater difficulty accessing housing in good condition and that they can afford. To assess affordability and other types of housing needs, HUD defines four housing problems:

1. A household is *cost burdened* if monthly housing costs (including mortgage payments, property taxes, insurance, and utilities for owners and rent and utilities for renters) exceed 30% of monthly income.

¹⁸ Maqbool, Nabihah, et al. "The Impacts of Affordable Housing on Health: A Research Summary." *Insights from Housing Policy Research*, Center for Housing Policy, www.rupco.org/wp-content/uploads/pdfs/The-Impacts-of-Affordable-Housing-on-Health-CenterforHousingPolicy-Maqbool.etal.pdf.

¹⁹ "State of the Nation's Housing 2015." Joint Center for Housing Studies of Harvard University, <http://www.jchs.harvard.edu/sites/default/files/jchs-sonhr-2015-full.pdf>

²⁰ Deirdre Oakley & Keri Burchfield (2009) Out of the Projects, Still in the Hood: The Spatial Constraints on Public-Housing Residents' Relocation in Chicago." *Journal of Urban Affairs*, 31:5, 589-614.

2. A household is *overcrowded* if there is more than 1.0 people per room, not including kitchen or bathrooms.
3. A housing unit *lacks complete kitchen facilities* if it lacks one or more of the following: cooking facilities, a refrigerator, or a sink with piped water.
4. A housing unit *lacks complete plumbing facilities* if it lacks one or more of the following: hot and cold piped water, a flush toilet, or a bathtub or shower.

HUD also defines four severe housing problems, including a severe cost burden (more than 50% of monthly housing income is spent on housing costs), severe overcrowding (more than 1.5 people per room, not including kitchens or bathrooms), lack of complete kitchen facilities (as described above), and lack of complete plumbing facilities (also as described above).

To assess housing need, HUD receives a special tabulation of data from the U. S. Census Bureau's American Community Survey that is largely not available through standard Census products. This data, known as Comprehensive Housing Affordability Strategy (CHAS) data, counts the number of households that fit certain combination of HUD-specified criteria, such as housing needs by race and ethnicity. CHAS data for Columbus and the Columbus region is provided in the tables that follow.

TABLE 6 – DEMOGRAPHICS OF HOUSEHOLDS WITH DISPROPORTIONATE HOUSING NEEDS

Households Experiencing any of the Four Housing Problems	City of Columbus			Franklin County			Columbus Region		
	# with problems	# of households	% with problems	# with problems	# of households	% with problems	# with problems	# of households	% with problems
Race and Ethnicity									
White, Non-Hispanic	68,905	208,400	33.1%	35,746	135,255	26.4%	173,278	587,518	29.5%
Black, Non-Hispanic	40,810	85,060	48.0%	5,284	11,997	44.0%	47,766	101,752	46.9%
Hispanic	6,805	12,440	54.7%	1,467	3,280	44.7%	9,280	18,205	51.0%
Asian or Pacific Islander, Non-Hispanic	3,614	12,168	29.7%	1,180	5,137	23.0%	5,454	20,596	26.5%
Native American, Non-Hispanic	303	677	44.8%	79	181	43.7%	523	1,217	43.0%
Other, Non-Hispanic	3,225	7,195	44.8%	803	1,969	40.8%	5,065	11,688	43.3%
Total	123,665	325,955	37.9%	44,655	157,930	28.3%	241,390	741,025	32.6%
Household Type and Size									
Family households, <5 People	46,665	149,070	31.3%	21,023	96,379	21.8%	105,245	408,836	25.7%
Family households, 5+ People	13,250	24,240	54.7%	4,875	14,474	33.7%	25,624	63,222	40.5%
Non-family households	63,765	152,660	41.8%	18,700	47,100	39.7%	110,500	268,943	41.1%
Households Experiencing any of the Four Severe Housing Problems									
	# with problems	# of households	% with Problems	# with problems	# of households	% with Problems	# with problems	# of households	% with Problems
Race and Ethnicity									
White, Non-Hispanic	33,644	208,400	16.1%	14,769	135,255	10.9%	78,237	587,518	13.3%
Black, Non-Hispanic	23,295	85,060	27.4%	2,451	11,997	20.4%	26,672	101,752	26.2%
Hispanic	4,159	12,440	33.4%	787	3,280	24.0%	5,471	18,205	30.1%
Asian or Pacific Islander, Non-Hispanic	2,065	12,168	17.0%	432	5,137	8.4%	2,797	20,596	13.6%
Native American, Non-Hispanic	230	677	34.0%	35	181	19.3%	343	1,217	28.2%
Other, Non-Hispanic	1,670	7,195	23.2%	406	1,969	20.6%	2,653	11,688	22.7%
Total	65,055	325,955	20.0%	18,893	157,930	12.0%	116,210	741,025	15.7%

Note: All % represent a share of the total population, except household type and size, which is out of total households.

Source: CHAS

TABLE 7 – DEMOGRAPHICS OF HOUSEHOLDS WITH SEVERE HOUSING COST BURDENS

Households with Severe Cost Burdens	City of Columbus			Franklin County			Columbus Region		
	# with problems	# of households	% with problems	# with problems	# of households	% with problems	# with problems	# of households	% with problems
Race and Ethnicity									
White, Non-Hispanic	29,995	208,400	14.4%	13,461	135,255	10.0%	69,025	587,518	11.8%
Black, Non-Hispanic	20,235	85,060	23.8%	2,112	11,997	17.6%	23,133	101,752	22.7%
Hispanic	2,615	12,440	21.0%	444	3,280	13.5%	3,374	18,205	18.5%
Asian or Pacific Islander, Non-Hispanic	1,560	12,168	12.8%	284	5,137	5.5%	2,108	20,596	10.2%
Native American, Non-Hispanic	230	677	34.0%	20	181	11.1%	314	1,217	25.8%
Other, Non-Hispanic	1,540	7,195	21.4%	294	1,969	14.9%	2,368	11,688	20.3%
Total	56,175	325,955	17.2%	16,615	157,930	10.5%	100,322	741,025	13.5%
Household Type and Size									
Family households, <5 People	20,157	149,070	13.5%	7,471	96,379	7.8%	40,633	408,836	9.9%
Family households, 5+ People	4,575	24,240	18.9%	1,145	14,474	7.9%	7,836	63,222	12.4%
Non-family households	31,420	152,660	20.6%	8,041	47,100	17.1%	51,910	268,943	19.3%

Note: Severe housing cost burden is defined as greater than 50% of income. All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households. The number of households is the denominator for the share with problems, and may differ from the number of households for the table on severe housing problems.

Source: CHAS

In Columbus, there are 123,665 households with at least one housing problem, about 38% of households citywide. About one-in-five Columbus households have a severe need (65,055 households or 20%).

Levels of need in the region are slightly lower: 33% of households have a housing problem and 16% have a severe housing problem.

Looking at need by householder race and ethnicity in Columbus shows that 33% of non-Latino white households have a housing problem and 16% have a severe housing problem. HUD defines a group as having a disproportionate need if its members experience housing needs at a rate that is ten percentage points or more above that of white households. Using this definition, all groups except Asian Americans demonstrate disproportionate needs. Hispanic households have the highest percentage experiencing problems overall (55%), while Native Americans have the highest percentage experiencing severe problems (34%).

Within the region, housing and severe housing need rates for white households are slightly lower than those in Columbus at 29% and 13%, respectively. Again, all groups except for Asian Americans faced disproportionate needs for both single and severe housing problems.

Table 6 also compares housing need rates for households by size and familial status. In Columbus, over half (55%) of families with five or more children live in households with problems. 42% of nonfamily households and 31% of families with less than five children live in housing with problems. Within the region, the percentage of households with problems is less, especially for households with five or more children (51%). Rates of housing with problems for nonfamily households are roughly equivalent to those in the city (41%), and families with less than five children are less at 26%.

Table 7 examines only one dimension of housing need – severe cost burdens. In Columbus, 56,175 households (17% of all households) spend more than half of their income on housing, Asian American (13%) and white (14%) households have a lower percentage with severe cost burdens than the citywide average. All other groups have higher than average rates. Native American (34%) and African American (24%) households have a disproportionate severe cost burden. Within the region, the percentage with severe cost burden is less than in the city of Columbus. As in the city, Native American (26%) and African American (23%) households have a disproportionately high rate compared to white households (12%).

Table 7 also shows that nonfamily households have a slightly higher rate (21%) of severe cost burden than family households with five or more children (19%) or less than five children (14%). The difference between these rates is even greater in the region, with 19% of nonfamily households having a severe cost burden, compared to 12% of households with five or more children and 10% of households with less than five children.

Figures 25 and 26 map the prevalence of housing cost burdens in Columbus by census tract.

FIGURE 24. HOUSING BURDEN AND RACE / ETHNICITY IN THE CITY OF COLUMBUS

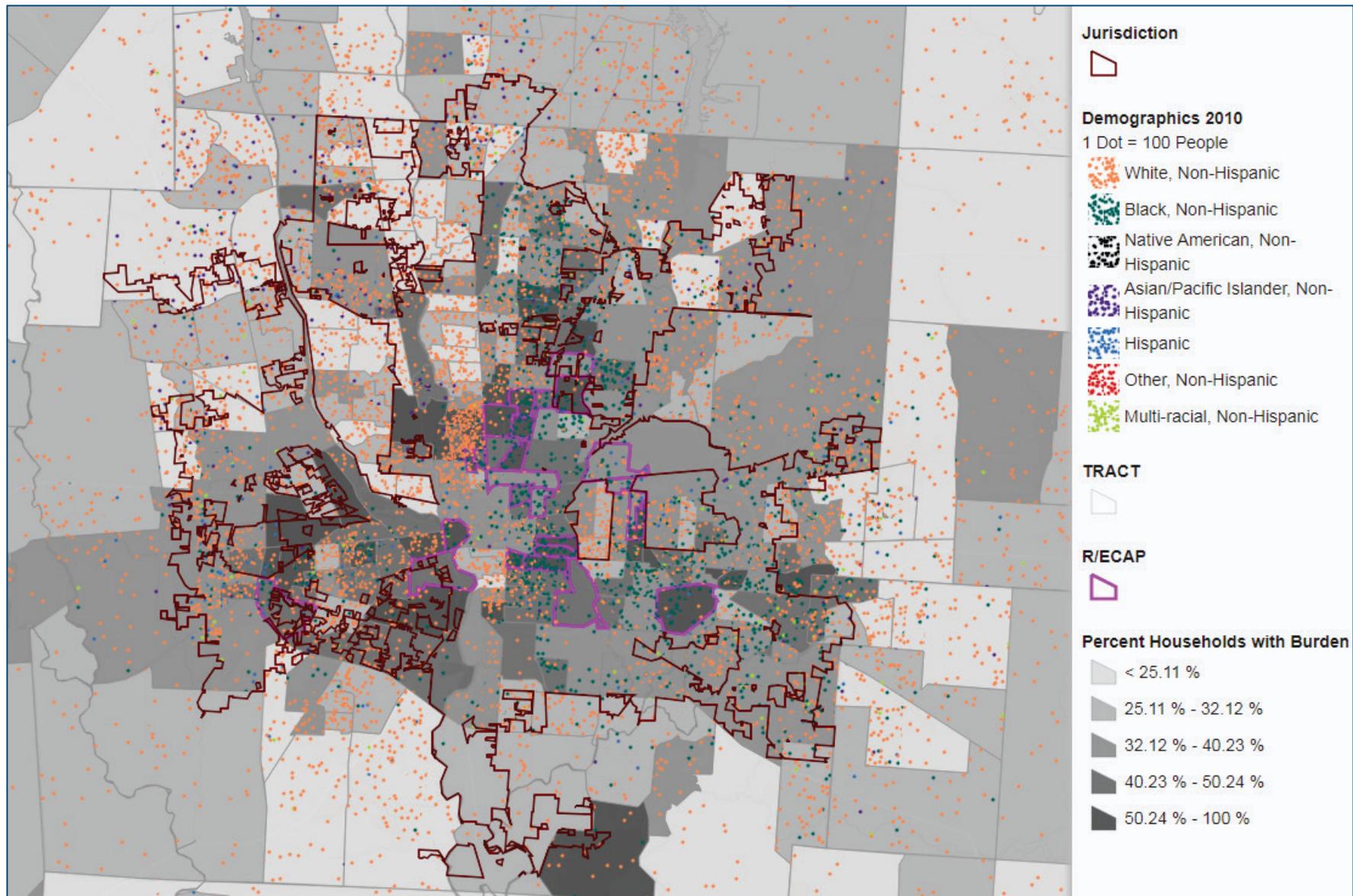
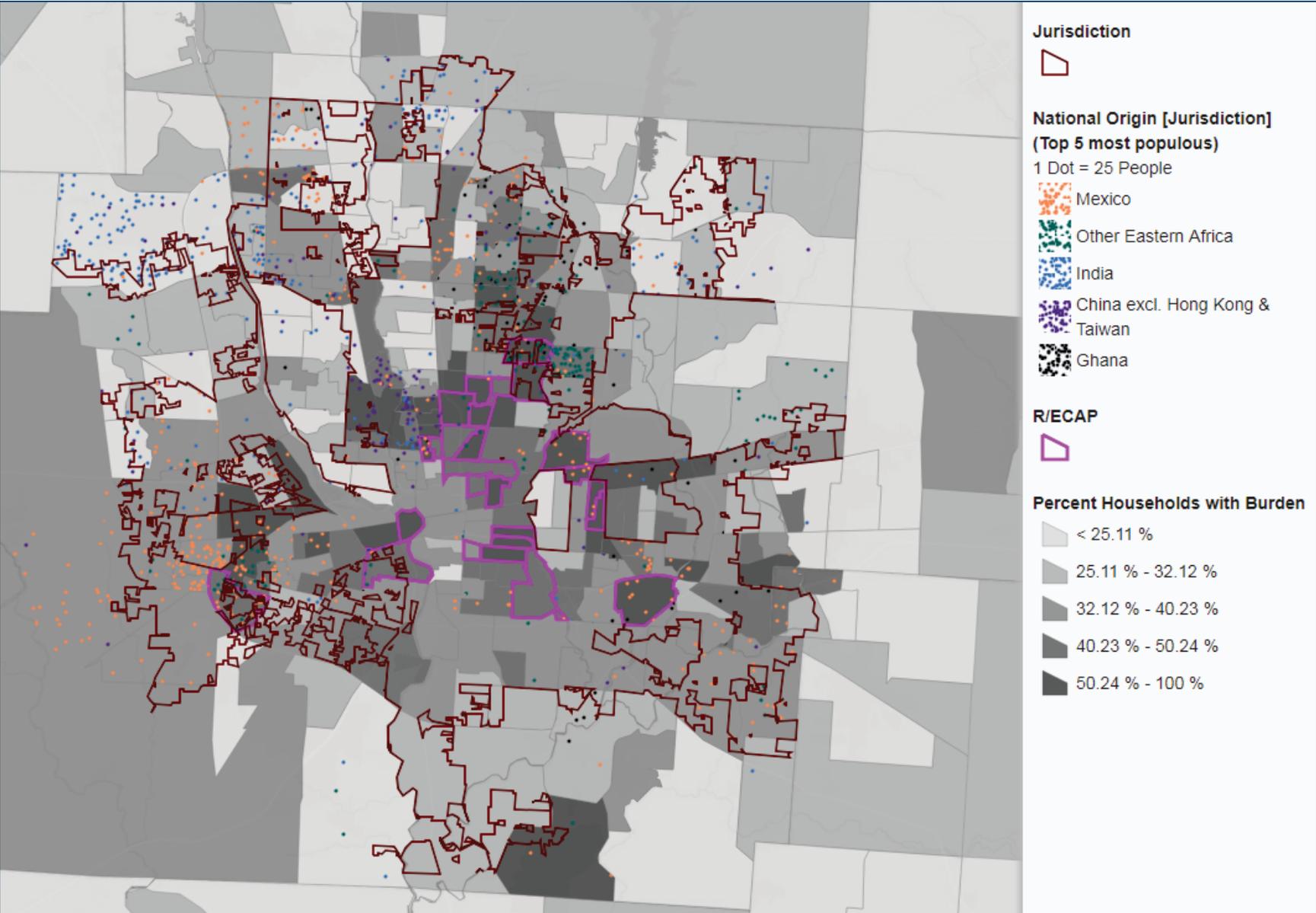


FIGURE 25. HOUSING BURDENS AND NATIONAL ORIGIN IN THE CITY OF COLUMBUS



Growing Affordability Challenges

The preceding data relies on HUD's Comprehensive Housing Affordability Strategy (CHAS) data, the most recent of which is developed using 2011-2015 American Community Survey data. While this data provides the most comprehensive information on housing need by race and ethnicity, it does not reflect current housing costs. To get a sense of how affordability challenges may have changed since the 2011-2015 ACS data was collected, this section considers how rental rates and home sales prices have grown in recent years.

According to research conducted by Harvard University's Joint Center for Housing Studies, 43.2% of renters in the Columbus metropolitan area spend more than 30% of their income on housing and 23.2% spend more than 50% of their income on housing.²¹ As of September 2018, Zillow reports a median rent of \$1,189 in the city of Columbus, up 1.4% from last year. Of the 20 largest Columbus neighborhoods tracked by Zillow, median rents were highest in Clintonville (\$1,565), Riverside (\$1,496), and East (\$1,417) and lowest in South Linden (\$759) and Hilltop (\$792). Zillow also tracks median rents for the 29 largest cities in the region. Of those, several had a median rent over \$2,000: New Albany (\$3,058), Upper Arlington (\$2,410), Dublin (\$2,391), Powell (\$2,379), Galena (\$2,354), and Bexley (\$2,149).²²

In 2018, two national real estate research firms identified Columbus' rental market as one of the hottest in the country, with annual rents rising by around 3-4% over last year amid a national slowdown in rent rate growth. According to HotPads, a Zillow affiliate, average monthly rents in Central Ohio were \$975 for a one-bedroom, \$1,105 for a two-bedroom, and \$1,350 for a three-bedroom unit, as of the second quarter of 2018. According to a HotPads representative, new construction of smaller units is limiting price increases in that market segment, but those looking for larger units should expect faster rent growth.²³ Indeed, the Columbus Dispatch reports that the strong rental market is impacting affordability and homelessness. According to the Community Shelter Board, rising rents and steady demand for rental product mean landlords can be more stringent when it comes to a rental applicant's rental and credit histories, thereby making it more difficult for homeless individuals and families to transition from a shelter to a rental unit.²⁴ Rising rents also make it more difficult for existing renters to stay in their homes, often forcing them to choose between reducing their spending on other necessities to meet increasing rents, moving to other less suitable but more affordable housing, or facing eviction.

Housing costs have increased on the homeownership side as well. As of the summer of 2018, the Columbus region was the second hottest home sales market in the country according to Realtor.com's rankings based on home listings traffic and time on the market. As reported in *Columbus Business First*, most home sales in June 2018 sold for more than their appraised value, with an average price of about

²¹ Joint Center for Housing Studies. "Renter Cost Burdens, Metropolitan and Micropolitan Areas." Harvard University. 2017. http://www.jchs.harvard.edu/ARH_2017_cost_burdens_by_metro

²² "Columbus Metro Market Overview: Rentals." Zillow. September 2018. Accessed via <https://www.zillow.com/research/local-market-reports/>

²³ Navera, Tristin. "Apartment rents keep rising in hot, hot Central Ohio." *Columbus Business First*. July 6, 2018. <https://www.bizjournals.com/columbus/news/2018/07/06/apartment-rents-keep-rising-in-hot-hot-central.html>

²⁴ Price, Rita. "Columbus' white-hot rental market making it harder for homeless families to find housing." *The Columbus Dispatch*. October 22, 2018.

\$245,000 and 23 days on the market, and an uptick in number of sales from the previous year.^{25,26} As of September 2018, the Columbus Realtors reported an average sales price of \$224,547 year-to-date, and a median of \$189,500. These figures represented an 8.0% and 9.3% increase from 2017 figures, respectively.²⁷

Zillow provides estimates of home values in the Columbus metropolitan region. Regionally, the median home value as of September 2018 was \$184,200, up 7.9% from the same time last year. The city of Columbus had a somewhat lower median value at \$148,200 but saw similar growth from 2017. Of the 20 largest cities in the region tracked by Zillow, median home values are highest in Upper Arlington (\$426,700), Dublin (\$392,300), Galena (\$389,300) and Powell (\$366,000) as of September 2018. Median values are under \$150,000 in five cities: Whitehall (\$92,700), Newark (\$126,500), Logan (\$126,800), Lancaster (\$137,200), and Columbus (\$148,200).²⁸ Of these, only Upper Arlington, Dublin, Whitehall, and Columbus are within Franklin County.

Increasing sales prices and home values can raise existing homeowners housing costs through increased property taxes. They also make it more difficult for households living in lower-cost starter homes to move up and free up their properties for first-time homebuyers. As fewer households are able to move from rental to homeownership, this strengthens rental market demand and rental rates, thereby contributing to affordability issues and cost burdens among renter households.

HOUSING SIZE

Availability of housing in a variety of sizes is important to meet the needs of different demographic groups. Neighborhoods with multi-bedroom detached, single-family homes will typically attract larger families, whereas dense residential developments with smaller unit sizes and fewer bedrooms often accommodate single-person households or small families. But market forces and affordability impact housing choice and the ability to obtain housing of a suitable size, and markets that do not offer a variety of housing sizes at different price points can lead to barriers for some groups. Rising housing costs can, for example, lead to overcrowding as large households with lower incomes are unable to afford pricier, larger homes and are forced to reside in smaller units. On the other hand, people with disabilities or seniors with fixed incomes may not require large units but can be limited by higher housing costs in densely populated areas where most studio or one-bedroom units are located.

Table 8 provides information for households living in publicly supported housing, including unit size and presence of children by housing program type. Assuming households with children would need two-bedroom or larger units, comparing the number of two- and three-plus bedroom units with the number

²⁵ Navera, Tristan. "Columbus housing market keeps getting hotter and hotter." *Columbus Business First*. July 6, 2018. <https://www.bizjournals.com/columbus/news/2018/07/06/columbus-housing-market-keeps-getting-hotter-and.html>

²⁶ Navera, Tristan. "Central Ohio home sales continue to break records." *Columbus Business First*. July 23, 2018. <https://www.bizjournals.com/columbus/news/2018/07/23/central-ohio-home-sales-continue-to-break-records.html>

²⁷ Columbus Realtors. "Local Market Update – September 2018: Franklin County." September 2018. <http://marketstatsreports.showingtime.com/CR/sst/2018-09/Franklin-County.pdf>

²⁸ "Columbus Metro Market Overview: Real Estate." Zillow. September 2018. Accessed via <https://www.zillow.com/research/local-market-reports/>

of households with children does not immediately indicate overcrowding in assisted housing. Theoretically, the 827 households with children who live in public housing could be housed in the 1,060 units with two or more bedrooms. There appear to be adequate units with two or more bedrooms for project-based Section 8 properties, other multifamily properties, and the units rented with HCVs.

However, because data about households with children by household size is not available, precise conclusions regarding the suitability of the existing publicly supported housing stock cannot be drawn. There may be a mismatch between large family households and the availability of three bedroom or larger units, but such a situation is not discernible without information about household size.

TABLE 8 – PUBLICLY SUPPORTED HOUSING BY PROGRAM CATEGORY: UNITS BY NUMBER OF BEDROOMS AND NUMBER OF CHILDREN IN THE CITY OF COLUMBUS

Housing Type	Households in 0-1 Bedroom Units		Households in 2 Bedroom Units		Households in 3+ Unit Bedrooms		Households with Children	
	#	%	#	%	#	%	#	%
City of Columbus								
Public Housing	261	19.6%	500	37.6%	560	42.1%	827	62.1%
Project-Based Section 8	2,834	43.8%	2,680	41.4%	898	13.9%	2,853	44.1%
Other Multifamily	804	91.9%	7	0.8%	5	0.6%	9	1.0%
HCV Program	2,458	23.3%	3,311	31.4%	4,537	43.1%	4,622	43.9%
Franklin County								
Public Housing	0	0.0%	0	0.0%	0	0.0%	-	-
Project-Based Section 8	833	59.7%	414	29.7%	122	8.8%	402	28.8%
Other Multifamily	432	90.6%	0	0.0%	0	0.0%	-	-
HCV Program	498	26.0%	514	26.8%	782	40.8%	819	42.7%

Data Source: APSH

HOMEOWNERSHIP

Homeownership is vital to a community’s economic well-being. It allows individuals the opportunity to build wealth, is generally associated with higher levels of civic engagement,²⁹ and is correlated with positive cognitive and behavioral outcomes among children.³⁰

Federal housing policies and discriminatory mortgage lending practices prior to the Fair Housing Act of 1968, along with continuing impediments to access, have had significant impacts on the homeownership

²⁹ Manturuk K, Lindblad M, Quercia R. “Homeownership and civic engagement in low-income urban neighborhoods: a longitudinal analysis.” *Urban Affairs Review*. 2012;48(5):731–60.

³⁰ Haurin, Donald R. et al. “The Impact of Homeownership on Child Outcomes.” *Low-Income Homeownership Working Paper Series*. Joint Center for Housing Studies of Harvard University. October 2001, <http://www.jchs.harvard.edu/sites/default/files/liho01-14.pdf>.

rates of racial and ethnic minorities, particularly Black and Hispanic populations. The gap between the white and Black homeownership rate is the largest among racial and ethnic groups. In 2017, the U.S. Census Bureau reported a 21.6 percentage point gap in homeownership rate between white and Black households; just a 2.9 percentage point decrease since 1997.³¹

Homeownership trends have changed in recent years because of significant events in the housing market and labor force. The homeownership rate for Millennials (the generation born between 1981 and 1997) is 8 percentage points lower than the two previous generations, controlling for age. This discrepancy can be attributed to a multitude of factors ranging from preference to urban areas, cost of education and associated debt, changes in marriage and childbearing patterns, rising housing costs, and the current supply of affordable houses.³²

In the city of Columbus, the majority of owner households are white (74%). This is higher than the proportion of the total population that is white (60%), indicating that homeownership rates for whites are disproportionately high. African Americans make up 19% of owner households. Considering that African Americans account for 27% of the total population, the ownership rate is disproportionately low. The percentage of owner households that are Hispanic (2%) is also disproportionately lower than the total Hispanic population (5%). Among other owner households, Asian Americans make up 3%, and other groups are 2%.

For renters, the majority are also white (55%) but at a percentage actually below the ratio of whites in the total population (60%). African Americans (32%) have a disproportionately high rate of renters and Hispanic households (5%) comprise the other largest portions of rental households, at a ratio similar to that of the total population that is Hispanic. Asian Americans account for 4% of renter households, also roughly proportionate to their percentage of the total population.

There is a similar and more pronounced pattern in the region. The majority of owner households are white (87%). Other notable home ownership proportions are 8% for African Americans and 2% for Asian Americans. African Americans have a significantly higher proportion of rental households than their share of the total population. Hispanic and Asian American households account for 4% and 3% of renters in the region.

The data in Table 9 can also be used to calculate homeownership rates by race and ethnicity, which shows that some groups are significantly less likely to be homeowners than whites. In Columbus, 54% of white households own their homes, compared to 34% of African Americans and 39% of both Asian American and Native American households. Hispanic households are the least likely to own their homes (24%). In the region, 69% of white households own their homes. Lowest rates of home ownership are found among Hispanic and African American households, and Native Americans, and Hispanic residents are more likely to own their home than in the city.

The maps that follow show the share of owners and renters by census tract in the City of Columbus.

³¹ U.S. Census Bureau. Homeownership Rates by Race and Ethnicity of Householder: 1994 to 2017.

³² Choi, Jung et al. "Millennial Homeownership: Why Is It So Low, and How Can We Increase It?" The Urban Institute. February 2000. https://www.urban.org/sites/default/files/publication/98729/millennial_homeownership_0.pdf

TABLE 9 – HOMEOWNERSHIP AND RENTAL RATES BY RACE AND ETHNICITY

Race and Ethnicity	City of Columbus				Franklin County				Columbus Region			
	Owners		Renters		Owner		Renters		Owners		Renters	
	#	%	#	%	#	%	#	%	#	%	#	%
Non-Hispanic												
White	113,175	74.0%	95,230	55.0%	105,160	90.3%	30,150	72.8%	404,695	87.1%	182,815	66.2%
Black	28,935	18.9%	56,125	32.4%	4,883	4.2%	7,096	17.1%	37,035	8.0%	64,735	23.4%
Asian	4,735	3.1%	7,455	4.3%	3,635	3.1%	1,493	3.6%	10,963	2.4%	9,634	3.5%
Native American	260	0.2%	415	0.2%	158	0.1%	24	0.1%	670	0.1%	553	0.2%
Other	2,750	1.8%	4,445	2.6%	1,190	1.0%	817	2.0%	5,420	1.2%	6,285	2.3%
Hispanic	3,000	2.0%	9,445	5.5%	1,455	1.3%	1,848	4.5%	5,945	1.3%	12,260	4.4%
Total	152,855	-	173,100	-	116,485	-	41,445	-	464,745	-	276,280	-

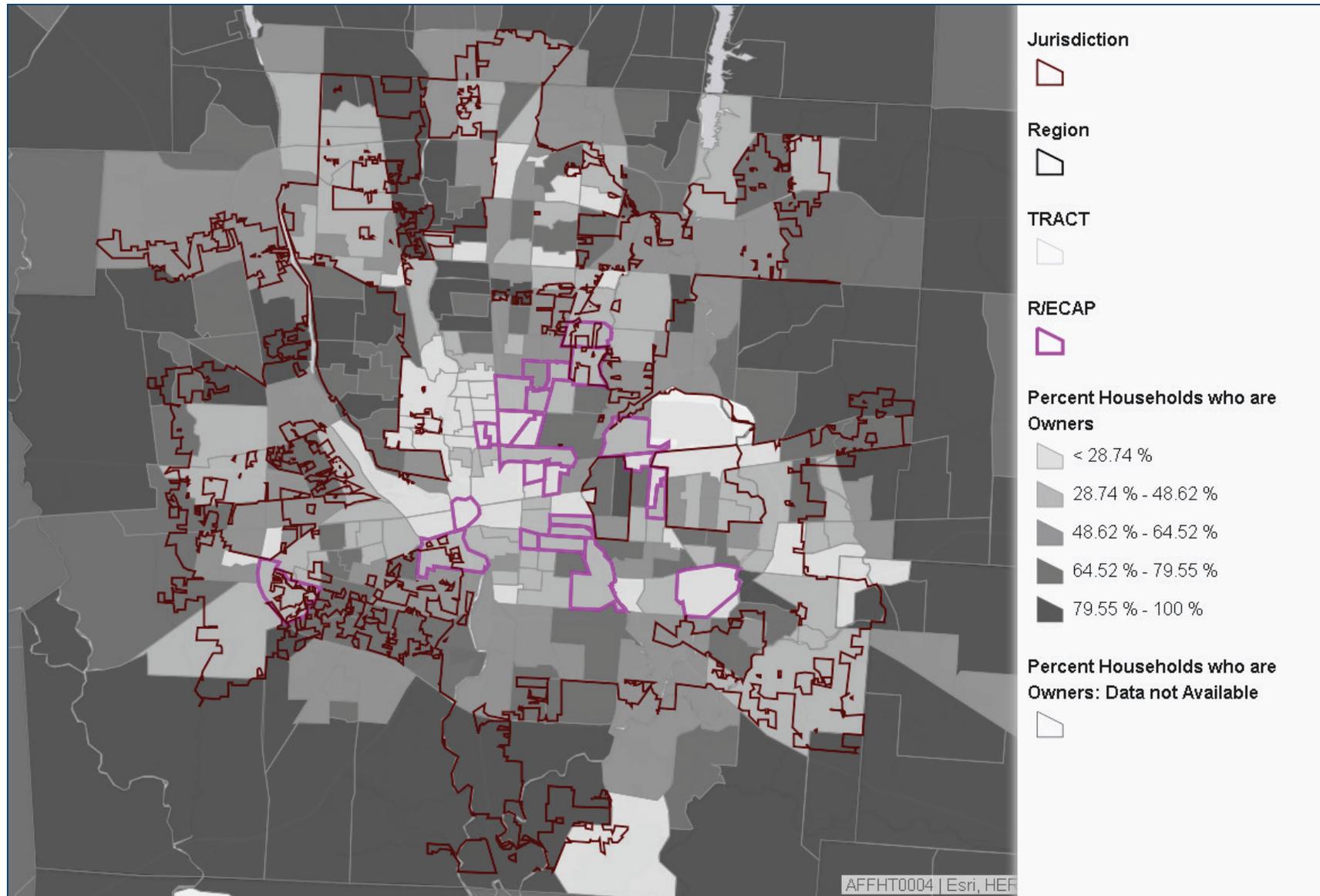
Note: Data presented are number of households, not individuals.

Source: APSH

FIGURE 26. SHARE OF HOUSEHOLDS THAT ARE RENTERS IN THE CITY OF COLUMBUS



FIGURE 27. SHARE OF HOUSEHOLDS THAT ARE OWNERS IN THE CITY OF COLUMBUS



Mortgage Lending

Homeownership is vital to a community's economic well-being. To live up to the requirements of fair housing law, all persons must have the ability to live where they want and can afford. Prospective homebuyers need access to mortgage credit, and programs that offer homeownership should be available without discrimination. This section assesses the degree to which the housing needs of Columbus and Franklin County residents are being met by home loan lenders.

The Home Mortgage Disclosure Act of 1975 (HMDA) requires most mortgage lending institutions to disclose detailed information about their home-lending activities annually. The objectives of the HMDA include ensuring that borrowers and loan applicants are receiving fair treatment in the home loan market.

HMDA data, which is provided by the Federal Financial Institutions Examination Council (FFIEC), includes home loan application data reported by banks, savings associated, credit unions, and mortgage companies. It includes the type, purpose, and characteristics of each home mortgage loan application that lenders receive during the calendar year. It also includes additional data related to those applications including loan pricing information, action taken, property location by census tract, and additional information about loan applicants including sex, race, ethnicity, and income.

The source for this analysis is tract-level HMDA data for Franklin County census tracts for the years ranging from 2013 to 2017, which includes a total of 58,577 conventional mortgage home loan applications and 30,7 home loan applications for government-insured mortgages (e.g., FHA-insured, VA-guaranteed, or FSA/RHS-guaranteed loans).³³ Within each HMDA record some of the data variables are 100% reported: "Loan Type," "Loan Amount," and "Action Taken," for examples, but other data fields are less complete. According to the HMDA data, these records represent applications taken entirely by mail, Internet, or phone in which the applicant declined to identify their sex, race, and/or ethnicity.

Missing race, ethnicity, and sex data are potentially problematic for an assessment of discrimination. If the missing data are non-random, there may be adverse impacts on the accuracy of the analysis. Ideally, any missing data for a specific data variable would affect a small proportion of the total number of loan records and therefore have only a minimal effect on the analytical results. Complete data about applicant income, race, and ethnicity were available for 82.9% of conventional loan applications and 87.4% of government-backed loan applications.

There is no requirement for reporting reasons for a loan denial, and this information was not provided for 15.3% of conventional mortgage loan denials and 22.4% of government-backed loan denials. Further, the HMDA data does not include a borrower's total financial qualifications such as an actual credit score, property type and value, loan-to-value ratio or loan product choices. Research has shown that differences in denial rates among racial or ethnic groups can arise from these credit-related factors not available in the HMDA data.³⁴ Despite these limitations, the HMDA data plays an important role in fair lending

³³ Includes mortgage applications for the purchase of one-to-four family dwellings in which the property will be occupied as the owner's principal dwelling and in which the mortgage will be secured by a first lien.

³⁴ R. B. Avery, Bhutta N., Brevoort K.P., and Canne, G.B. 2012. "The Mortgage Market in 2011: Highlights from the Data Reported Under the Home Mortgage Disclosure Act." Board of Governors of the Federal Reserve System. Federal Reserve Bulletin, Vol. 98, No. 6.

enforcement. Bank examiners frequently use HMDA data in conjunction with information from loan files to assess an institution's compliance with the fair lending laws.

The table below shows loan denial rates for low, middle, and upper income applicants by race and ethnicity.³⁵ For conventional loans, white applicants made up 85.1% of total applicants, Black applicants made up 5.4%, Asians comprised 6.5%, and Latinos constituted 2.2%. The applicant pool for government-backed loans was somewhat more diverse: 71.4% white, 20.1% Black, 2.5% Asian, and 4.9% Latino.

TABLE 10 – LOAN APPROVAL RATES BY RACE AND ETHNICITY IN FRANKLIN COUNTY, 2013 – 2017

Applicant Income		Applicant Race and Ethnicity					All Applicants
		Non-Latino				Latino	
		White	Black	Asian	Other		
Home Purchase Loans – Conventional Loans							
Low Income	Completed Applications	11,043	1,250	1,288	155	494	14,230
	Denial Rate	11.6%	23.4%	13.7%	18.7%	20.6%	13.2%
Middle Income	Completed Applications	9,763	589	564	79	221	11,216
	Denial Rate	6.8%	17.7%	11.7%	8.9%	15.4%	7.8%
High Income	Completed Applications	20,507	788	1,328	141	358	23,122
	Denial Rate	5.8%	12.7%	7.8%	8.5%	9.5%	6.2%
All Applicants	Completed Applications	41,313	2,627	3,180	375	1,073	48,568
	Denial Rate	7.6%	18.9%	10.9%	12.8%	15.8%	8.7%
Home Purchase Loans – FHA-Insured, VA-Guaranteed, and FSA/RHS-Guaranteed Loans							
Low Income	Completed Applications	9,884	3,547	431	167	1,028	15,057
	Denial Rate	15.1%	21.8%	20.0%	22.8%	19.9%	17.2%
Middle Income	Completed Applications	5,385	1,215	146	92	252	7,090
	Denial Rate	9.9%	17.1%	11.6%	7.6%	10.7%	11.2%
High Income	Completed Applications	3,886	620	101	47	35	4,689
	Denial Rate	9.8%	16.0%	16.8%	14.9%	48.6%	11.1%
All Applicants	Completed Applications	19,155	5,382	678	306	1,315	26,836
	Denial Rate	12.6%	20.1%	17.7%	17.0%	18.9%	14.6%

Note: "Completed applications" includes applications that were approved but not accepted, denied, and approved with a loan originated. It does not include applications withdrawn by the applicant or closed for incompleteness.

Data Source: FFIEC 2013-2017 Home Mortgage Disclosure Act Data, Accessed via www.consumerfinance.gov/data-research/hmda

For low-income applicants, conventional loan denial rates ranged from 11.6% for whites to 20.6% for Latinos and 23.4% for Black applicants. Government-backed loan denial rates were 15.1% for low-income whites, and in the 20-23% range for low-income applicants of color. Middle-income applicants had lower

³⁵ The low- income category includes applicants with a household income below 80% of area median family income (MFI). The moderate income range includes applicants with household incomes from 50% to 120% MFI, and the upper income category consists of applicants with household incomes above 120% MFI.

denial rates than the low-income group for all races and ethnicities. For conventional loan applicants in the middle-income band, African Americans had denial rates of 17.7% and Latinos of 15.4%, compared to 6.8% for whites. At the high-income level, conventional loan denial rates ranged from 5.8% for whites to 12.7% for Asians. Overall, this analysis indicates that loan outcomes for white applicants were generally better than for applicants of color, regardless of income level or loan type.

The table on the following page identifies reasons for loan denials for white, Black, Asian, Latino and other applicants. Findings are summarized below:

- For conventional home loans, denial reasons were less likely to be provided for Latino applicants (24.1%) than for other applicants (ranging from 13 to 16%). For government-backed loans, denial reasons were less likely to be provided for white and African American applicants (both a little less than one-quarter of denials) than other population groups.
- The most common reasons for conventional loan denials for white applicants were collateral and incomplete credit applications, affecting outcomes for 25.4% and 23.0% of denials, respectively. For African Americans, top denial reasons for conventional loans were debt-to-income ratio (24.5%) and credit history (23.7%). These were also the top two denial reasons for Latino applicants for conventional mortgage loans.
- For all racial and ethnic groups the top four reasons for loan denials were the same: collateral, incomplete credit applications, credit history, and debt-to-income ratio. Other denial reasons affected 10% or less of denied loan applications for all population segments.

Census tracts often approximate neighborhoods and can provide a convenient measure of the small area effects of loan discrimination. Table 12 provides the counts and rates of loan actions for Franklin County census tracts by the racial and ethnic composition of the tract.

The first two categories show loans that were approved by a HMDA-reporting loan institution. Many loans were approved and resulted in a mortgage (“Loan Originated”), although in some cases an application was approved but the applicant decided not to finalize the loan; these are categorized as “Approved But Not Accepted.”

More than half of conventional loans (55.3%) were for homes in census tracts where white residents made up 80% or more of the population. Government-backed loans were used for purchases in more diverse neighborhoods – 35.6% were for homes in tracts where white residents made up 80% or more of the population and another 40.0% were in tracts where white residents made up between 60 and 80% of the population.

Overall, loan origination rates for both conventional and government-backed loans are strongly correlated with racial and ethnic composition. The highest conventional loan origination rate (79.6%) were in tracts where people of color constituted 0 to 9.9% of the population. Origination rates declined steadily as the white population share decreased. In tracts where people of color made up 90% or more of the population, only 55.1% of conventional applications resulted in loans. While other factors about these loans that may indicate reasons for denials, such as applicant income, credit information, and loan to value ratio, are not reflected here, this data does indicate that both conventional and government-backed

loans are considerably less likely to be approved for properties in census tracts where people of color make up greater shares of the population than in tracts where the large majority of the population is white.

TABLE 11 – REASONS FOR LOAN DENIAL BY APPLICANT RACE AND ETHNICITY IN FRANKLIN COUNTY, 2013-2017

Reason for Denial	Applicant Race and Ethnicity					All Applicants
	Non-Latino				Latino	
	White	Black	Asian	Other		
Home Purchase Loans – Conventional Loans						
Denial reason provided	84.9%	84.1%	87.3%	85.4%	75.9%	84.7%
Collateral	25.4%	21.1%	14.7%	16.7%	17.1%	23.6%
Credit application incomplete	23.0%	11.3%	21.7%	16.7%	12.9%	21.0%
Credit history	13.4%	23.7%	9.5%	18.8%	19.4%	14.6%
Debt to income ratio	18.3%	24.5%	30.3%	22.9%	17.6%	20.1%
Employment history	2.8%	2.8%	6.6%	4.2%	2.9%	3.1%
Insufficient cash	5.9%	7.6%	6.9%	10.4%	5.9%	6.2%
Mortgage insurance denied	0.7%	1.0%	0.3%	0.0%	0.0%	0.6%
Other	6.7%	8.9%	8.7%	4.2%	9.4%	7.2%
Unverifiable information	4.2%	4.4%	8.4%	6.3%	4.7%	4.6%
Reason not provided	15.1%	15.9%	12.7%	14.6%	24.1%	15.3%
Total denials	3,141	497	346	48	170	4,202
Home Purchase Loans – FHA-Insured, VA-Guaranteed, and FSA/RHS-Guaranteed Loans						
Denial reason provided	77.6%	75.3%	85.0%	82.7%	82.3%	77.6%
Collateral	15.5%	12.4%	15.0%	15.4%	12.4%	14.4%
Credit application incomplete	13.1%	11.1%	18.3%	7.7%	9.6%	12.4%
Credit history	21.2%	22.4%	11.7%	25.0%	16.9%	21.0%
Debt to income ratio	20.5%	23.8%	29.2%	32.7%	29.7%	22.4%
Employment history	4.9%	4.5%	9.2%	13.5%	8.4%	5.2%
Insufficient cash	8.8%	9.9%	10.8%	9.6%	9.2%	9.2%
Mortgage insurance denied	0.1%	0.0%	0.0%	0.0%	0.0%	0.1%
Other	9.3%	9.4%	8.3%	7.7%	12.4%	9.5%
Unverifiable information	3.8%	5.1%	6.7%	3.8%	7.2%	4.5%
Reason not provided	22.4%	24.7%	15.0%	17.3%	17.7%	22.4%
Total denials	2,405	1,082	120	52	249	3,908

Note: Some applications were denied for multiple reasons; thus, the total number of denial reasons reported are greater than the total number of loans denied.

Data Source: FFIEC 2013-2017 Home Mortgage Disclosure Act Data, Accessed via www.consumerfinance.gov/data-research/hmda

TABLE 12 – LOAN ACTIONS BY RACIAL AND ETHNIC COMPOSITION OF CENSUS TRACTS IN FRANKLIN COUNTY, 2013-2017

Share of Census Tract Population that are People of Color	Loan Actions					Total Applications
	Loan Originated	Approved, Loan Not Accepted	Denied by Financial Institution	Withdrawn by Applicant	Closed for Incomplete-ness	
Home Purchase Loans – Conventional Loans						
0 to 9.9%	79.6%	3.4%	6.1%	9.7%	1.2%	12580
10 to 19.9%	79.3%	3.3%	7.0%	9.2%	1.2%	22737
20 to 29.9%	76.6%	3.6%	8.6%	10.0%	1.2%	12614
30 to 39.9%	76.4%	3.8%	9.1%	9.5%	1.2%	9151
40 to 49.9%	71.2%	3.9%	11.6%	11.9%	1.3%	2744
50 to 59.9%	69.4%	3.0%	13.5%	12.4%	1.7%	1397
60 to 69.9%	66.2%	5.5%	14.8%	11.6%	1.8%	775
70 to 79.9%	65.5%	2.9%	16.4%	13.4%	1.7%	1029
80 to 89.9%	61.3%	4.0%	19.6%	13.1%	1.9%	677
90 to 99.9%	55.1%	3.4%	23.1%	15.0%	3.4%	147
Total	77.2%	3.5%	8.2%	9.8%	1.2%	63,851
Home Purchase Loans – FHA-Insured, VA-Guaranteed, and FSA/RHS-Guaranteed Loans						
0 to 9.9%	74.2%	3.0%	11.2%	9.9%	1.7%	3843
10 to 19.9%	74.6%	3.2%	11.7%	9.4%	1.2%	8367
20 to 29.9%	73.3%	2.8%	12.8%	9.7%	1.4%	7620
30 to 39.9%	72.2%	3.0%	13.1%	10.3%	1.4%	6124
40 to 49.9%	66.7%	3.6%	15.9%	11.7%	2.1%	3017
50 to 59.9%	67.5%	4.3%	13.5%	12.2%	2.5%	1520
60 to 69.9%	59.7%	5.2%	19.8%	12.9%	2.4%	1299
70 to 79.9%	64.5%	5.0%	16.9%	11.2%	2.3%	1407
80 to 89.9%	59.8%	3.5%	22.0%	11.7%	3.0%	898
90 to 99.9%	56.7%	5.8%	20.1%	15.2%	2.2%	224
Total	71.3%	3.3%	13.4%	10.3%	1.6%	34,319

Data Source: FFIEC 2013-2017 Home Mortgage Disclosure Act Data, Accessed via www.consumerfinance.gov/data-research/hmda

ZONING, AFFORDABILITY, AND HOUSING CHOICE

Comprehensive land use planning is a critical process by which communities address a myriad of public policy issues such as housing, transportation, health, recreation, environmental protection, commercial and retail services, and land values, and address how the interconnection and complexity of these issues can ultimately impact the entire municipality. “The land use decisions made by a community shape its very character – what it’s like to walk through, what it’s like to drive through, who lives in it, what kinds

of jobs and businesses exist in it, how well the natural environment survives, and whether the community is an attractive one or an ugly one.”³⁶ Likewise, decisions regarding land use and zoning have a direct and profound impact on affordable housing and fair housing choice, shaping a community or region’s potential diversity, growth, and opportunity for all. Zoning determines where housing can be built, the type of housing that is allowed, and the amount and density of housing that can be provided. Zoning also can directly or indirectly affect the cost of developing housing, making it harder or easier to accommodate affordable housing.

The following sections will explore (I) how Ohio state law impacts local land use and zoning authority and decision-making and (II) how the zoning and land use codes of the City of Columbus and Franklin County impact housing affordability and fair housing choice within those borders.

Intersection of Local Zoning with Federal and State Fair Housing Laws

One goal of zoning is to balance individual property rights with the power of government to promote and protect the health, safety, and general welfare of the overall community. Zoning codes regulate how a parcel of land in a community may be used and the density of development. Local governments may divide their jurisdiction into zoning districts by adopting a zoning map consistent with the comprehensive plan; define categories of permitted and special/conditional uses for those districts; and establish design or performance standards for those uses. Zoning may regulate the height, shape, and placement of structures and lot sizes or shapes. Jurisdictions also can expressly prohibit certain types of uses within zoning districts.³⁷ In this way, local ordinances may define the type and density of housing resources available to residents, developers, and other organizations within certain areas, and as a result influence the availability and affordability of housing.

While local governments have the power to enact zoning and land use regulations, that power is limited by state and federal fair housing laws (e.g., the Ohio Fair Housing Law, the federal FHAA, the Americans with Disabilities Act, constitutional due process and equal protection), which apply not only to private individuals but also to government actions. See H.R. Rep. No. 100–711, at 24 (1988), reprinted in 1988 U.S.C. C.A.N. 2173, 2185 (showing that Congress’ intent was that the amendments “would also apply to state or local land use and health and safety laws, regulations, practices or decisions which discriminate against individuals with handicaps”). In a recent landmark disparate impact case under the FHA, the Supreme Court affirmed that part of the FHA’s central purpose is to eradicate discriminatory housing practices, including specifically unlawful zoning laws and other housing restrictions. *Tex. Dep’t of Hous. & Cmty. Affairs v. Inclusive Cmty. Project, Inc.*, 135 S.Ct. 2507, 2521-2522 (2015) (citing multiple published court opinions involving challenges to local zoning and land use decisions and stating: “Suits targeting

³⁶ John M. Levy. *Contemporary Urban Planning, Eighth Edition*. Upper Saddle River, NJ: Pearson Prentice Hall, 2009.

³⁷ Local government power to regulate land use derives from the state’s expressly delegated police power, first to municipal governments and then to counties and townships, as found in the various enabling statutes of the state constitution and Ohio Revised Code. See Article XVIII, Section 3, of the Ohio Constitution which grants municipalities the legal authority to adopt land use and control measures; OHIO REV. CODE ANN. § 713.06-.12 (municipalities); OHIO REV. CODE ANN. § 519 et seq. (township zoning); OHIO REV. CODE ANN. § 303 et seq. (counties). The Ohio Supreme Court and lower state courts have consistently held that a specifically adopted “comprehensive plan” is not a prerequisite to a valid municipal zoning ordinance. See, e.g., *Columbia Oldsmobile, Inc. v. Montgomery*, 56 Ohio St.3d 60 (1990), cert. denied, 111 S.Ct. 2854, 115 L.Ed.2d 1022 (1991).

such practices reside at the heartland of disparate-impact liability.”) Besides intentional discrimination and disparate treatment, discrimination under the FHA also includes

[A] refusal to make reasonable accommodations in rules, policies, practices, or services, when such accommodations may be necessary to afford such person equal opportunity to use and enjoy a dwelling. FHA § 804(f)(3)(b).

This provision has been held to apply to zoning and land use decisions by local governments. *See, e.g., Howard v. City of Beavercreek*, 276 F.3d 802 (6th Cir. 2001) (finding Section 804(f)(3)(b) “creates an affirmative duty on municipalities . . . to afford its disabled citizens reasonable accommodations in its municipal zoning practices if necessary to afford such persons equal opportunity in the use and enjoyment of their property”); *Smith & Lee Assocs., Inc. v. City of Taylor*, 102 F.3d 781, 794-795 (6th Cir. 1996) (holding that city had violated the FHAA by failing to allow adult foster care homes to operate in areas zoned only for single-family neighborhoods).

In 1965, the Ohio legislature amended its Laws Against Discrimination to include protections against discrimination in housing, making it one of the first states to enact fair housing legislation. In 1992, the state’s civil rights and anti-discrimination laws were amended to expand the classes of persons protected by the Ohio Fair Housing Law and to enhance the enforcement powers of the Ohio Civil Rights Commission. The amendments brought Ohio’s fair housing statute into “substantial equivalence” with the federal FHAA by adding “familial status” to the protected classes and including a one-year filing period for housing discrimination charges. Currently, Ohio’s Fair Housing Law protects persons on the basis of race, color, religion, sex, national origin, disability, familial status, or military status.

Ohio qualifies to participate in HUD’s Fair Housing Assistance Program (FHAP). The Ohio Civil Rights Commission partners with HUD to investigate and resolve fair housing complaints and enforce the state’s fair housing and fair lending laws. The Commission’s authority is derived from Ohio Revised Code Chapter 4112 and Ohio Administrative Code Chapter 4112. The Commission has the power and duty to receive, investigate, render formal determinations, and conciliate charges of unlawful discrimination in the areas of employment, housing, public accommodations, credit, and disability in institutions of higher education. Moreover, the Commission seeks to educate the public about the state’s civil rights laws and prepares a comprehensive educational program for the students of Ohio’s public schools. The Commission receives and investigates thousands of official charges of discrimination each year.

If an individual has evidence that his/her rights under the FHA or state fair housing law have been violated in a final land use or zoning decision, the aggrieved person may file a complaint with the Ohio Civil Rights Commission or with HUD, or file a lawsuit directly in state or federal court within the statute of limitations period. (HUD refers matters involving the legality of state or local zoning or other land use law or ordinance to the Department of Justice for further enforcement. *See* 42 U.S.C. 3610(g)(2)(C)).

In addition, the City of Columbus has adopted a local fair housing ordinance, Code of Ordinances Sec. 2231.02. Under the local ordinance, it is a first-degree misdemeanor to recklessly commit an unlawful discriminatory practice. In addition to the protected classes under the FHAA and Ohio Fair Housing Law, the local ordinance extends fair housing protections to persons on the basis of sexual orientation, gender identity or expression, and ancestry.

Franklin County has not adopted its own separate fair housing ordinance.

Fair housing laws do not preempt local zoning laws but do apply to municipalities and local government units, and prohibit them from making zoning or land use decisions or implementing land use policies that exclude or otherwise discriminate against protected persons. Even where a specific zoning decision does not violate a fair housing law, HUD entitlement communities must certify annually that they will set and implement standards and policies that protect and advance fair housing choice for all.

City of Columbus Zoning Ordinance Review

Although comprehensive plans and zoning and land use codes play an important role in regulating the health and safety of the structural environment, overly restrictive codes can negatively impact housing affordability and fair housing choice within a jurisdiction. Examples of zoning provisions that most commonly result in barriers to fair housing choice include:

- Restrictive forms of land use that exclude any specific form of housing, particularly multi-family housing, or that require large lot sizes or low-density that deter affordable housing development by limiting its economic feasibility;
- Restrictive definitions of family that impede unrelated individuals from sharing a dwelling unit;
- Placing administrative and siting constraints on group homes for persons with disabilities;
- Restrictions making it difficult for residents with disabilities to locate housing in certain neighborhoods or to modify their housing;
- Restrictions on occupancy of alternative sources of affordable housing such as accessory dwellings, mobile homes, and mixed-use structures.

The City's and County's treatment of these types of issues are explored and evaluated in the tables and narrative below.

Because zoning codes present a crucial area of analysis for a study of impediments to fair housing choice, the latest available zoning ordinances of Columbus and of Franklin County were reviewed and evaluated against a list of ten common fair housing issues. Taken together, these issues give a picture of (1) the degree to which exclusionary zoning provisions may impact affordable housing opportunities within those jurisdictions and (2) the degree to which the zoning code may impact housing opportunities for persons with disabilities. The zoning ordinance was assigned a risk score of either 1, 2, or 3 for each of the ten issues and was then given an aggregate score calculated by averaging the individual scores, with the possible scores defined as follows:

1 = low risk – the provision poses little risk for discrimination or limitation of fair housing choice, or is an affirmative action that intentionally promotes and/or protects affordable housing and fair housing choice;

2 = medium risk – the provision is neither among the most permissive nor most restrictive; while it could complicate fair housing choice, its effect is not likely to be widespread;

3 = high risk – the provision causes or has potential to result in systematic and widespread housing discrimination or the limitation of fair housing choice, or is an issue where the jurisdiction could take affirmative action to further affordable housing or fair housing choice but has not.

The following chart lists the ten issues reviewed and the City’s and County’s scores for each issue. A complete report for each jurisdiction, including citations to relevant statutes, code sections, and explanatory comments, is included as an appendix to this document.

TABLE 13 – ZONING CODE RISK SCORES

Issue	Risk Scores	
	City of Columbus	Franklin County
1a. Does the jurisdiction’s definition of “family” have the effect of preventing unrelated individuals from sharing the same residence? Is the definition unreasonably restrictive?	3	3
1b. Does the definition of “family” discriminate against or treat differently unrelated individuals with disabilities (or members of any other protected class)?		
2a. Does the zoning code treat housing for individuals with disabilities (e.g. group homes, congregate living homes, supportive services housing, personal care homes, etc.) differently from other single family residential and multifamily residential uses? For example, is such housing only allowed in certain residential districts, must a special or conditional use permit be granted before siting such housing in certain residential districts, etc.?	1	2
2b. Does the zoning ordinance unreasonably restrict housing opportunities for individuals with disabilities who require onsite supportive services? Or is housing for individuals with disabilities allowed in the same manner as other housing in residential districts?		
3a. Do the jurisdiction’s policies, regulations, and/or zoning ordinances provide a process for persons with disabilities to seek reasonable modifications or reasonable accommodations to zoning, land use, or other regulatory requirements?	2	2
3b. Does the jurisdiction require a public hearing to obtain public input for specific exceptions to zoning and land-use rules for applicants with disabilities? If so, is the public hearing process only required for applicants seeking housing for persons with disabilities or required for all applicants?		
4. Does the ordinance impose spacing or dispersion requirements on certain protected housing types?	2	1
5. Does the jurisdiction restrict any inherently residential uses protected by fair housing laws (such as residential substance abuse treatment facilities) only to non-residential zones?	3	2

Issue	Risk Scores	
	City of Columbus	Franklin County
6a. Does the jurisdiction’s zoning and land use rules constitute exclusionary zoning that precludes development of affordable or low-income housing by imposing unreasonable residential design regulations (such as high minimum lot sizes, wide street frontages, large setbacks, low FARs, large minimum building square footage or large livable floor areas, restrictions on number of bedrooms per unit, and/or low maximum building heights)?	1	2
7. Does the zoning ordinance fail to provide residential districts where multifamily housing is permitted as of right? Are multifamily dwellings excluded from all single family dwelling districts?	1	2
7b. Do multifamily districts restrict development only to low-density housing types?		
8. Are unreasonable restrictions placed on the construction, rental, or occupancy of alternative types of affordable or low-income housing (for example, accessory dwellings or mobile/manufactured homes)?	1	2
9a. Are the jurisdiction’s design and construction requirements (as contained in the zoning ordinance or building code) congruent with the Fair Housing Amendments Act’s accessibility standards for design and construction?	1	2
9b. Is there any provision for monitoring compliance?		
10. Does the zoning ordinance include an inclusionary zoning provision or provide any incentives for the development of affordable housing or housing for protected classes?	1	2
Average Risk Score	1.6	2.0

The City’s total average risk score (calculated by taking the average of the 10 individual issue scores) is 1.6, indicating that overall there is low to moderate risk of the zoning regulations contributing to discriminatory housing treatment or impeding fair housing choice. In most cases, the zoning and other land use code sections are reasonably permissive and allow for flexibility as to the most common fair housing issues. The City received a “3” (high risk) score on two issues (#1 and #5) and also received a “2” (medium risk) score on certain issues where the zoning regulations have the potential to negatively impact fair and affordable housing. The County’s cumulative scores averaged to “2” or medium risk, and it also received a “3” high risk score on one specific issue. These medium and high risk scores could indicate the local governments may be vulnerable to fair housing complaints where the ordinance is applied in a way that impacts a protected class of persons. In such cases, improvements to the rules and policies could be made to more fully protect the fair housing rights of all the area’s residents and to better fulfill the mandate to affirmatively further fair housing.

Our research has shown that restricting housing choice for certain historically/socio-economically disadvantaged groups and protected classes can happen in any number of ways and should be viewed on a continuum. The zoning analysis matrix developed for this report and the narrative below are not designed to assert whether the City’s and County’s codes create a per se violation of the FHA or HUD

regulations, but are meant as a tool to highlight significant areas where zoning and land use ordinances may otherwise jeopardize the spirit and intent of fair housing protections and HUD's AFFH standards for its entitlement communities.

The issues selected for discussion here concern areas where zoning ordinances and policies could go further to protect fair housing choice for protected and disadvantaged classes, and yet still fulfill the zoning objective of protecting the public's health, safety, and general welfare. Specifically, the issues highlighted by the matrix inform, first, the degree to which the zoning ordinance may be overly restrictive and exclusionary to the point of artificially limiting the affordable housing inventory and directly contributing to higher housing and rental costs. And secondly, the matrix helps inform the impact the local regulations may have on housing opportunities for persons with disabilities, a protected class under state and federal fair housing law. This second dimension of zoning analysis regarding impact on people with disabilities is discussed more fully in Chapter 8.

Impact of Zoning Provisions of Affordable Housing

Academic and market research have proven what also is intuitive: land use regulations can directly limit the supply of housing units within a given jurisdiction, and thus contribute to making housing more expensive, i.e. less affordable.³⁸ Zoning policies that impose barriers to housing development and artificially limit the supply of housing units in a given area by making developable land and construction costlier than they are inherently can take different forms and may include: high minimum lot sizes, low density allowances, wide street frontages, large setbacks, low floor area ratios, large minimum building square footage or large livable floor areas, restrictions on number of bedrooms per unit, low maximum building heights, restrictions against infill development, restrictions on the types of housing that may be constructed in certain residential zones, arbitrary or antiquated historic preservation standards, minimum off-street parking requirements, restrictions against residential conversions to multi-unit buildings, lengthy permitting processes, development impact fees, and/or restrictions on accessory dwelling units. Where these zoning regulations are not congruent with the actual standards necessary to protect the health and safety of residents and prevent overcrowding, they may not be in express violation of fair housing laws but may nonetheless contribute to exclusionary zoning and have the effect of disproportionately reducing housing choice for moderate to low-income families, minorities, persons with disabilities on fixed incomes, families with children, and other protected classes by making the development of affordable housing cost prohibitive.

Columbus's design standards, density allowances, and housing-type diversity do not appear facially exclusionary, and the City received "1/low risk" score for Issue 6 and Issue 7 regarding exclusionary zoning regulations for single and multifamily housing types. While the zoning ordinance may impact the feasibility of developing affordable housing within some low-density rural districts, such as the R, LR, and RRR Districts, thus creating a barrier to fair housing choice in some neighborhoods, the code provides for lot

³⁸ See Gyourko, Joseph, Albert Saiz, and Anita A. Summers, *A New Measure of the Local Regulatory Environment for Housing Markets: The Wharton Residential Land Use Regulatory Index* (2007), available at real.wharton.upenn.edu; Randal O'Toole, *The Planning Penalty: How Smart Growth Makes Housing Unaffordable* (2006), available at independent.org/pdf/policy_reports/2006-04-03-housing.pdf; Edward L. Glaeser and Joseph Gyourko, *The Impact of Zoning on Housing Affordability* (2002), available at law.yale.edu/system/files/documents/pdf/hier1948.pdf; The White House's *Housing Development Toolkit*, 2016, available at whitehouse.gov/sites/whitehouse.gov/files/images/Housing_Development_Toolkit%20f.2.pdf.

sizes and densities that could accommodate affordable housing elsewhere within the residential districts. But there are recommendations for how the City could use more flexible zoning and land use policy to support investment in its affordable housing stock.

The zoning code and map divide the City's residential districts into single family districts with minimum lot sizes ranging from 1 u/a in the R (rural) and LR (limited rural) districts; 20,000 sq. ft. per unit in the RRR district; 10,000 sq. ft. in the RR district; 7,200 sq. ft. in the SR, R-1, and MHD districts; and 5,000 sq. ft. in the R-2, R-3, and R-4 districts. Two-family units in the R-2F and R-4 districts may be on minimum lots of 3,000 sq. ft. per unit for a two-story and 3,600 sq. ft. for a one-story dwelling. PC (planned community) and PUD (planned unit development) districts permit single family and a variety of multiple uses and housing types up to 14 units per acre in a PC district or up to 8 u/a in the PUD-8 district. Planned communities do require additional design requirements, permitting and review processes than traditional residential zoning. Planning Overlays also allow for single family, 2-family, and 3-family units to be added where the underlying zoning is an A-R apartment district. The TND (traditional neighborhood) districts are designed to promote transit-supportive, mixed-use neighborhoods with minimum densities of 5 u/a and a variety of housing types to serve a range of incomes and age groups with accessible "neighborhood scale commercial" (single use retail tenants of 10,000 square feet or less). Although lot dimensions are not excessively restrictive, many of the single-family districts also impose minimum livable floor area standards ranging from 1,500 sq. ft. in the R-1 district; 1,000 sq. ft. in the RRR district; 850 sq. ft. in the RR district; and 720 sq. ft. in the ST and R-2 districts. Off street parking regulations require 2 spaces for 1, 2, and 3 dwelling units and 1.5 spaces for 4 or more dwelling units. As noted in a recent analysis by the Rose Center and Urban Land Institute of 3 corridors within the city center, 36% of residents in the study area did not own a car and there is ample on-street parking, making the off-street parking requirement onerous and unjustifiably costly to development.

Various types of multifamily developments, including 3-4 dwelling units, apartment houses (5+ dwelling units), apartment complexes, and town homes (3-8 consecutive units) are permitted in in the R-4, AR-12, ARLD, AR-1, AR-2, AR-3, AR-4, PUDs, TND-NC, and TND-TC districts. Mixed-use buildings (commercial uses on ground floor with multifamily dwellings above) are permitted in the East Franklin District, C-1 neighborhood commercial, and Downtown district. In the R-4 and AR districts, density may be limited somewhat by maximum height restrictions (35 ft. to 60 ft.) but maximum densities (units/ acre) may range from medium to high throughout the multifamily districts due to comparatively low minimum lot size per unit requirements. Minimum lot sizes for multifamily range from 2,500 sq. ft. per unit in R-4 and ARLD, 1,200 sq. ft. per unit in AR-1 and AR-4, 800 sq. ft. per unit in AR-2, and unrestricted for new construction in AR-3, AR-O, and DD zones.

In Franklin County, the zoning code and map divide the unincorporated portions of the County into rural districts without public water/sewer (Rural, LDR, R-1), which require greater lot sizes, and residential districts served by public sewer/water. Planned Residential Districts, Planned Unit Development districts, Farm Village, and Oscar Lots are additional single-family type districts with additional approval processes and design criteria. The Rural and LDR zones require 2.5 acres / single family dwelling unit. In R-1 the minimum lot size is 1 acre / SF unit. In R-2, the minimum lot size is 20,000 sq. ft. or 2 single family u/a. R-4 permits 4 SF units per acre on minimum lot sizes of 8,500 sq. ft. In R-8, the minimum lot size for SF is 7,200 sq. ft. The smallest minimum lot requirements for single family is in the R-12 district at 6,000 sq. ft.

With approval of a Planned Residential District (which allows cluster designs), a single-family development on a site area of at least 10 acres may cluster dwellings with a maximum of 6 u/a and 30% of land devoted to public open space. For a residential PUD, the maximum density is 12 u/a. The County's design standards, density allowances, and preference for single family dwellings across most residential districts—while more permissive than some of the County's incorporated municipalities— may artificially and unreasonably affect the feasibility of developing affordable and low-income housing within the jurisdiction.

Two-family dwellings are a conditional use in the R-4 district with a minimum lot size of 17,000 sq. ft. Two-family structures on a minimum lot size of 10,000 sq. ft. and townhomes up to a maximum of 4 units and minimum lot size of 5,000 sq. ft. per unit are a conditional use in the R-8 district. Two-family structures with a minimum lot size of 7,200 sq. ft. and townhomes with a minimum lot size of 7,200 sq. ft. plus 1,200 sq. ft. per unit over 2 are a permitted use in the R-12 district with a maximum density of 12 u/a. In the R-24 district, two-family structures and townhomes are permitted with a minimum lot size of 7,200 sq. ft. per structure, 1,800 sq. ft. per dwelling unit, and with a maximum density of 24 u/a. Multifamily housing is a conditional use in the R-12 district provided there are no more than 4 units per structure, minimum lot size is 7,200 sq. ft. plus 1,200 sq. ft. per unit over 2 units, maximum lot coverage is 35%, and maximum height is 30 feet. In the R-24 district multifamily housing no greater than 3 stories and 12 units per structure is a permitted use. Multifamily housing over 3 stories and/or 12 units per structure requires conditional use permit approval, and still is restricted to maximum height of 38 feet and maximum density of 24 u/a unless the developer seeks variance approval for more permissive design standards. Compared to other suburban municipalities, the County's standards for housing types other than single-family may be more permissive and allow greater density, but compared to the city of Columbus, the County's standards are still quite restrictive. The County scored a "2" (medium risk) on issues 6 and 7 regarding exclusionary zoning and restrictive development standards.

As for Issue 8 regarding alternative affordable housing types, both Columbus and Franklin County permit manufactured housing in certain areas. In Columbus, accessory dwelling units, described as "ancillary dwellings" are permitted within the NE, NG, and NC subdistricts of a "traditional neighborhood development." An ancillary dwelling unit may be attached or detached from the principal residence, may not exceed 800 sq. ft. and must share a single set of utility connections with a principal building. The owner must occupy either the principal building or the apartment. Importantly, an ancillary dwelling unit does not count toward density calculations. In Franklin County, accessory dwelling units are a conditional use only in the Rural District where certain conditions are met including that the unit must be attached to the principal dwelling, size shall not exceed 816 sq. ft., public water/sewer must be provided, 2 additional off-street parking spaces must be provided, the minimum lot is 1.5 times the lot size for the district, the property owner must occupy the principal dwelling, and the accessory dwelling tenant must be a family member of the owner. The requirement that the tenant be related to the owner could be challenged as an arbitrary regulation designed to preserve the existing racial makeup of a neighborhood rather than allowing for greater integration. There is opportunity to expand accessory dwelling units as an alternative and low-impact form of affordable housing.

Exclusionary zoning can happen on a continuum and in both Columbus and unincorporated Franklin County there is more the jurisdictions could do to use their zoning and land use policies to further remove

artificial barriers to development of and access to affordable housing across all residential zones. For example, to encourage more infill development in the traditionally low-density neighborhoods, minimum lot sizes could be further reduced and minimum livable floor area standards repealed; accessory (ancillary) dwellings permitted in more neighborhoods; conversion of established single-family dwellings to multifamily dwellings permitted by right; off-street parking requirements reduced; and height restrictions relaxed to allow for more density on the same footprint.

Where there is a disconnect between current zoning requirements and design standards, nonconforming uses, area plans and the future land use map, developers seeking to add more density, infill development, or mix of housing and commercial uses must go through the variance process. The variance process has been cited as a source of uncertainty and increased cost for developers and a source of uncertainty and frustration for area commissioners, planners, and neighborhood residents who see developers using the variance process as a way around zoning standards.³⁹ In neighborhoods targeted for redevelopment and infill development, the zoning code design and dimensional standards may need to be updated to align with current and anticipated trends in housing demand so that developers need to rely less on the costly variance process.

All together, these zoning tools could potentially allow for more supply of housing, which helps put downward pressure on rental prices, so that moderate and low-income families have access to those neighborhoods and all the congruent benefits that come with higher opportunity areas such as access to jobs, better schools, access to transportation, and access to cultural amenities and public accommodations.

Moreover, the City's and County's land use regulations could go beyond just meeting the minimum FHA standards and affirmatively further and incentivize the development of affordable housing with inclusionary zoning policies (Issue 10). Currently, Franklin County has not adopted specific development incentives like density bonuses, reduced parking, or design waivers, variances, or expedited permitting for the development of affordable or low-income housing or housing for protected classes. In 2018, Columbus adopted tax abatement incentives to encourage the development of affordable housing units in new mixed-income and mixed-use developments in areas of the city designated as Market Ready Areas, Ready for Revitalization, or Ready for Opportunity. Importantly, to help maintain the incentive to keep units affordable, the tax abatements cease if the affordable units are no longer occupied by qualified persons within 80%-100% AMI. However, to protect current residents from displacement in areas of revitalization and reinvestment, the tax abatement criteria should be more congruent with the existing AMI levels in a particular neighborhood or corridor where the developer wants to build. The City's inclusionary policies could be strengthened further to incorporate other development incentives like density bonuses, reduced parking or design waivers, variances, or expedited permitting for the development of affordable or low-income housing or housing for protected classes.

³⁹ See Ferenchik, Mark, *Does Columbus Zoning Board Bulldoze Area-Commission Decisions?*, THE COLUMBUS DISPATCH, Sept. 25, 2017, available at <http://www.dispatch.com/news/20170925/does-columbus-zoning-board-bulldoze-area-commission-decisions/>; Berger, Gideon, *Can Columbus, Ohio Become a Model for Equitable Community Development?*, May 2, 2018, available at <https://danielrosecenter.org/can-columbus-ohio-become-a-model-for-equitable-community-development/>.

CHAPTER 7.

PUBLICLY SUPPORTED HOUSING

Publicly supported housing encompasses several strategies and programs developed since the 1930s by the federal government to ameliorate housing hardships that exist in neighborhoods throughout the country. The introduction and mass implementation of slum clearance to construct public housing projects during the mid-1900s signified the beginning of publicly supported housing programs. Government-owned and managed public housing was an attempt to alleviate problems found in low-income neighborhoods such as overcrowding, substandard housing, and unsanitary conditions. Once thought of as a solution, the intense concentration of poverty in public housing projects often exacerbated negative conditions that would have lasting and profound impact on their communities.

Improving on public housing's model of high-density, fixed-site dwellings for very low-income households, publicly supported housing programs have since evolved into a more multi-faceted approach overseen by local housing agencies. The Housing and Community Development Act of 1974 created Section 8 rental assistance programs. Section 8, also referred to as the Housing Choice Voucher (HCV) program, provides two types of housing vouchers to subsidize rent for low-income households: project-based and tenant-based. Project-based vouchers can be applied to fixed housing units in scattered site locations while tenant-based vouchers allow recipients the opportunity to find and help pay for available rental housing on the private market.

The Tax Reform Act of 1986 created the Low-Income Housing Tax Credit (LIHTC) program to incentivize development of affordable, rental-housing development. Funds are distributed to state housing finance agencies that award tax credits to qualified projects to subsidize development costs. Other HUD Programs including Section 811 and Section 202 also provide funding to develop multifamily rental housing specifically for disabled and elderly populations.

The now-defunct HOPE VI program was introduced in the early 1990s to revitalize and rebuild dilapidated public housing projects and create mixed-income communities. Although HOPE VI achieved some important successes, the Choice Neighborhoods Initiative program was developed to improve on the lessons learned from HOPE VI. The scope of Choice Neighborhoods spans beyond housing and addresses employment access, education quality, public safety, health, and recreation.⁴⁰

Current publicly supported housing programs signify a general shift in ideology toward more comprehensive community investment and de-concentration of poverty. However, studies have shown a tendency for subsidized low-income housing developments and residents utilizing housing vouchers to continue to cluster in disadvantaged, low-income neighborhoods. Programmatic rules and the point allocation systems for LIHTC are thought to play a role in this clustering and recent years have seen many states revising their allocation formulas to discourage this pattern in new developments.⁴¹ The reasons

⁴⁰ Department of Housing and Urban Development. *Evidence Matters: Transforming Knowledge Into Housing and Community Development Policy*. 2011. www.huduser.gov/portal/periodicals/em/EM-newsletter_FNL_web.pdf.

⁴¹ Dawkins, Casey J. *Exploring the Spatial Distribution of Low Income Housing Tax Credit Properties*. US Department of Housing and Urban Development, www.huduser.gov/publications/pdf/dawkins_exploringliht_assistedhousingcr04.pdf.

for clustering of HCVs is more complicated since factors in decision-making vary greatly by individual household. However, there are indications that proximity to social networks, difficulties searching for housing, and perceived or actual discrimination contribute to clustering.⁴² This section will review the current supply and occupancy characteristics of publicly supported housing types and its geographic distribution within the study area.

SUPPLY AND OCCUPANCY

Columbus Metropolitan Housing Authority (CMHA) owns over 2,200 housing units throughout the Columbus region, housing families, the elderly, and people with disabilities and providing recreational, social, and educational services made possible through the cooperation of many community agencies and organizations. In addition, the CMHA manages over 13,000 vouchers under the Housing Choice Voucher Program, allowing tenant households to pay affordable rents at units of their choice throughout the area. Not all of the publicly supported housing units in Columbus or Franklin County are owned or managed by CMHA and not all of CMHA’s units and vouchers are within those jurisdictions, which results in some divergence between CMHA’s unit counts and those presented in the table below.

Columbus has a variety of publicly supported housing units, including 1,407 public housing units in 16 complexes, 6,755 units in 65 Project-Based Section 8 complexes, and 882 units in 33 other complexes with some other form of federal housing subsidy. 11,454 households in Columbus and another 2,085 households in Franklin County use Housing Choice Vouchers toward their rent payments at properties of their choice. Taken together, these publicly supported housing programs account for approximately one in 20 housing units in Columbus and one in 45 in Franklin County. However, because the programs are all rent-based, the share of rental units in the city supported in some form by a public subsidy is considerably higher, about one in eight.

TABLE 14 – PUBLICLY SUPPORTED HOUSING UNITS BY PROGRAM CATEGORY

Housing Units	City of Columbus		Franklin County	
	#	%	#	%
Total housing units	366,194	-	177,360	-
Public housing	1,407	0.4%	-	-
Project-based Section 8	6,755	1.8%	1,422	0.8%
Other multifamily	882	0.2%	475	0.3%
HCV program	11,454	3.1%	2,085	1.2%

Source: Decennial Census; APSH

Based on the demographic data presented earlier in this analysis, Columbus’s population is 27% African American. Given that figure, African American households are dramatically overrepresented in all

⁴² Galvez, Martha M. *What Do We Know About Housing Choice Voucher Program Location Outcomes? A Review of Recent Literature*. What Works Collaborative, 2010. www.urban.org/sites/default/files/publication/29176/412218-What-Do-We-Know-About-Housing-Choice-Voucher-Program-Location-Outcomes-.PDF.

categories of publicly supported housing units. The percent of households of all other socio-economic groups in publicly supported housing is less than their share of the population. The largest disparity is in the Public Housing category, where 89% of households are African American. The closest to proportional is in the Other Family category, where 59% of households are white and 40% are African American.

Comparing population shares by income, in all low-income bands (0-30%, 0-50%, and 0-80% AMI), African American households are overrepresented. However, they are not overrepresented to the same degree that they reside in publicly supported housing. This indicates that African Americans have a greater need than white residents, but even accounting for this, access publicly supported housing units at a disproportionately high rate. Latino households are overrepresented in all low-income bands as well. This indicates that Latino households, while having a greater proportional need for the affordability of publicly supported housing, obtain such units at disproportionately low rates.

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TABLE 15 – PUBLICLY SUPPORTED HOUSING RESIDENTS BY RACE AND ETHNICITY

Housing Type	Race and Ethnicity							
	White		Black		Hispanic		Asian or Pacific Islander	
	#	%	#	%	#	%	#	%
City of Columbus								
Public Housing	122	9.3%	1,165	88.9%	13	1.0%	10	0.8%
Project-Based Section 8	1,444	22.7%	4,679	73.4%	90	1.4%	145	2.3%
Other Family	467	59.3%	305	38.8%	7	0.9%	8	1.0%
HCV Program	1,893	18.4%	8,314	80.7%	57	0.6%	18	0.2%
0-30% AMI	27,340	46.4%	24,930	42.3%	3,040	5.2%	1,895	3.2%
0-50% AMI	45,395	45.1%	38,245	38.0%	5,490	5.5%	2,785	2.8%
0-80% AMI	82,835	50.9%	56,345	34.6%	8,570	5.3%	4,909	3.0%
Total Households	208,400	63.9%	85,060	26.1%	12,440	3.8%	12,168	3.7%
Franklin County								
Public Housing	-	-	-	-	-	-	-	-
Project-Based Section 8	901	66.5%	423	31.2%	14	1.0%	14	1.0%
Other Family	331	79.2%	44	10.5%	1	0.2%	41	9.8%
HCV Program	528	29.2%	1,263	69.9%	5	0.3%	8	0.4%
0-30% AMI	9,307	74.4%	2,179	17.4%	570	4.6%	222	1.8%
0-50% AMI	15,813	62.7%	3,693	14.6%	1,060	4.2%	410	1.6%
0-80% AMI	33,557	70.8%	6,255	13.2%	1,901	4.0%	905	1.9%
Total Households	135,255	85.6%	11,997	7.6%	3,280	2.1%	5,137	3.3%
Columbus Region								
Public Housing	218	15.5%	1,165	82.9%	13	0.9%	10	0.7%
Project-Based Section 8	3,218	37.1%	5,161	59.5%	111	1.3%	162	1.9%
Other Family	882	68.2%	352	27.2%	10	0.8%	49	3.8%
HCV Program	5,702	35.9%	9,999	63.0%	104	0.7%	31	0.2%
0-30% AMI	61,285	62.6%	27,728	28.3%	3,937	4.0%	2,213	2.3%
0-50% AMI	104,100	57.9%	42,922	23.9%	7,200	4.0%	3,391	1.9%
0-80% AMI	200,160	65.1%	64,284	20.9%	11,653	3.8%	6,468	2.1%
Total Households	587,518	79.3%	101,752	13.7%	18,205	2.5%	20,596	2.8%

Note: Data presented are number of households, not individuals.

Source: Decennial Census; CHAS; APSH

The patterns of occupancy at the majority of Public Housing locations are consistent with the above general patterns. Occupants are disproportionately African American at most complexes. Some

exceptions to this are highlighted in the table. The majority of residents are white in Waggoner Senior Housing, and Worley Terrace II has the highest percentage of Hispanic residents and the second highest percentage of whites. Project-based Section 8 housing follows a similar pattern, with disproportionately large ratios of African American residents. Notable exceptions include Heritage Tower, Creative Living Center I and II, St. George on the Common, Teakwood, and Jefferson Avenue, in which residents are disproportionately white. Jaycee Village has the highest percentage of Hispanic residents, and Restoration Plaza I and II and River Lodge Apartments also have slightly higher proportions of Hispanic residents. Other HUD-assisted multifamily complexes generally have higher percentages of white residents and lower percentages of African American residents.

GEOGRAPHY OF SUPPORTED HOUSING

In the first map that follows, the locations of publicly supported housing developments are represented along with levels of Housing Choice Voucher use. The second map shows the same information about Voucher use along with racial/ethnic demographics.

The blue markers on the first map indicate the locations of public housing. The largest group is located just northeast of downtown Columbus. This area has relatively high African American populations. To the north are several other public housing locations, also in areas of high African American population. Another is located in the diverse Franklinton neighborhood just west of downtown, and one more is located in a relatively diverse neighborhood in south Columbus.

The orange markers on the first map, indicating the locations of Project Based Section 8 units, are located in several clusters, primarily in the city. The largest cluster is downtown and in the neighborhoods just east, roughly corresponding to the group of public housing complexes discussed above. Another cluster is located just southeast of the Ohio State University. This is a more diverse area, with Hispanic and Asian American residents. Several more clusters are located in northeast Columbus, also areas with higher African American populations, and the northernmost cluster is in an area of Hispanic concentration as well. Finally, a cluster at the southwestern edge of the city, with some extending beyond city limits into Franklin County, roughly corresponds with an area of Hispanic concentration. Other Project Based Section 8 complexes are scattered throughout the area.

Finally, the map also depicts the locations of Low Income Housing Tax Credit developments. The Low Income Housing Tax Credit (LIHTC) program is the primary source of subsidy for development of affordable housing by the private market. Created by the Federal Tax Reform Act of 1986, the LIHTC program makes available an indirect federal subsidy for investors in affordable rental housing. The value of the tax credits awarded to a project may be syndicated by the recipient to generate equity investment, offsetting a portion of the development cost. As a condition of the LIHTC subsidy received, the resulting housing must meet certain affordability conditions. LIHTC units tend to be centrally located in Columbus, and in areas with the highest levels of Housing Choice Voucher use. Other units are scattered along the southern periphery of the city.

The rates at which Housing Choice Vouchers (HCVs) are used are represented by the shading on the map. In the second map, this same information about HCVs is shown along with racial/ethnic information. HCVs

are issued to households and may be used at a rental unit of the tenant's choosing to reduce the tenant's share of rent payments to an affordable level. Therefore, unlike the publicly supported developments marked on the map, HCVs are portable and their distribution throughout the city is subject to fluctuate over time. The current map shows that voucher use corresponds highly with non-white, particularly African American population in eastern and northeastern Columbus, and on the eastern edge of the city.

When the map of publicly supported housing locations is compared with the maps of opportunity index scores in Chapter 5 of this report, it is clear that different housing locations all carry with them different positive and negative opportunity attributes.

The primary concentration of publicly assisted housing, including Project Based Section 8, Low Income Housing Tax Credit developments, and public housing units, is located in the central eastern area of Columbus. These units are likely to be located in areas with relatively low transportation costs and with transit available. Jobs are nearby as well. However, these areas have less access to proficient schools, less labor market engagement, and higher poverty. Though in slightly different locations, areas with high HCV uses show similar patterns. These same challenges exist in the other areas of publicly assisted housing concentration to the north, and these areas have slightly less access to jobs. The area southeast of the Ohio State University has a smaller cluster of publicly-supported housing units. This area has better access to proficient schools, higher labor market engagement, lower poverty, and comparable transportation costs and job access. However, there are fewer publicly assisted units in this area. The group of publicly supported housing on the western edge of the city is in an area with somewhat lower poverty and slightly better labor market engagement, but with slightly higher transportation costs and less proximity to jobs.

The CMHA is in the process of converting all of its traditional public housing units into project-based vouchers under HUD's Rental Assistance Demonstration (RAD) program. This program delivers benefits to the housing authority related to increased operating autonomy and a greater ability to leverage the authority's assets to provide for the community's housing needs. The RAD program also benefits CMHA's residents by converting fixed public housing units into unit-based vouchers that can be used to subsidize individual housing units in scattered locations throughout the service area. CMHA's RAD strategy entails the placement of project-based vouchers in "neighborhoods of opportunity" that offer amenities and opportunity features that are not as readily available in the CMHA's current public housing communities. The CMHA expects to use the project-based vouchers to subsidize approximately 1,100 new housing units in suburban Franklin County communities. At the same time that CMHA is pursuing subsidies for new public housing options in opportunity-rich suburban communities, the Authority is also working to make transformative improvements to the Poindexter Village area in Columbus's Near East community. With a 2014 Choice Neighborhoods implementation grant of nearly \$30 million and additional local commitments totaling \$225 million. The revitalization project is focused on housing redevelopment, supportive services, education, and economic development.

Evaluating tradeoffs in access to opportunity is an important exercise because it demonstrates that no one neighborhood has all the markers of high opportunity – and neither are high scores on all the opportunity indices likely to be imperative for any one person or household. A family with children may opt for an affordable housing option in a neighborhood with access to better schools, even if it offers lower proximity to jobs and a longer, costlier commute. Conversely, a retiree who is no longer employed and does not have school-aged children may choose a neighborhood with many services nearby over one

with good schools or jobs proximity. The relative concentration of Columbus’s public housing currently means that there are somewhat limited options for the low- and moderate-income population residing at these properties, however, CMHA’s RAD and Choice Neighborhood initiatives are working to increase access to opportunity in meaningful ways.

DRAFT

FIGURE 28. PUBLICLY SUPPORTED HOUSING AND RACE / ETHNICITY IN THE CITY OF COLUMBUS

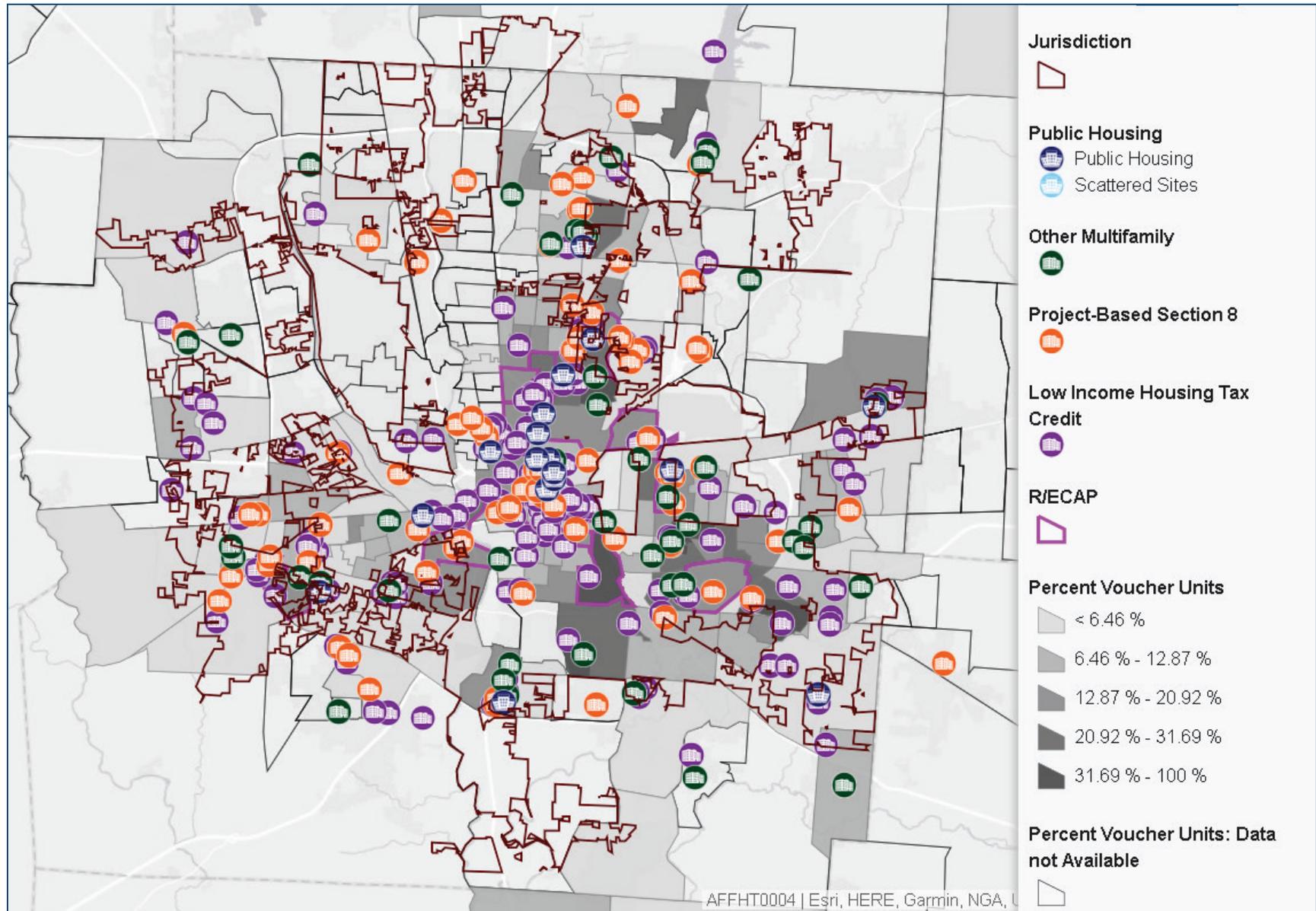


FIGURE 29. VOUCHER UNITS AND RACE/ ETHNICITY IN THE CITY OF COLUMBUS

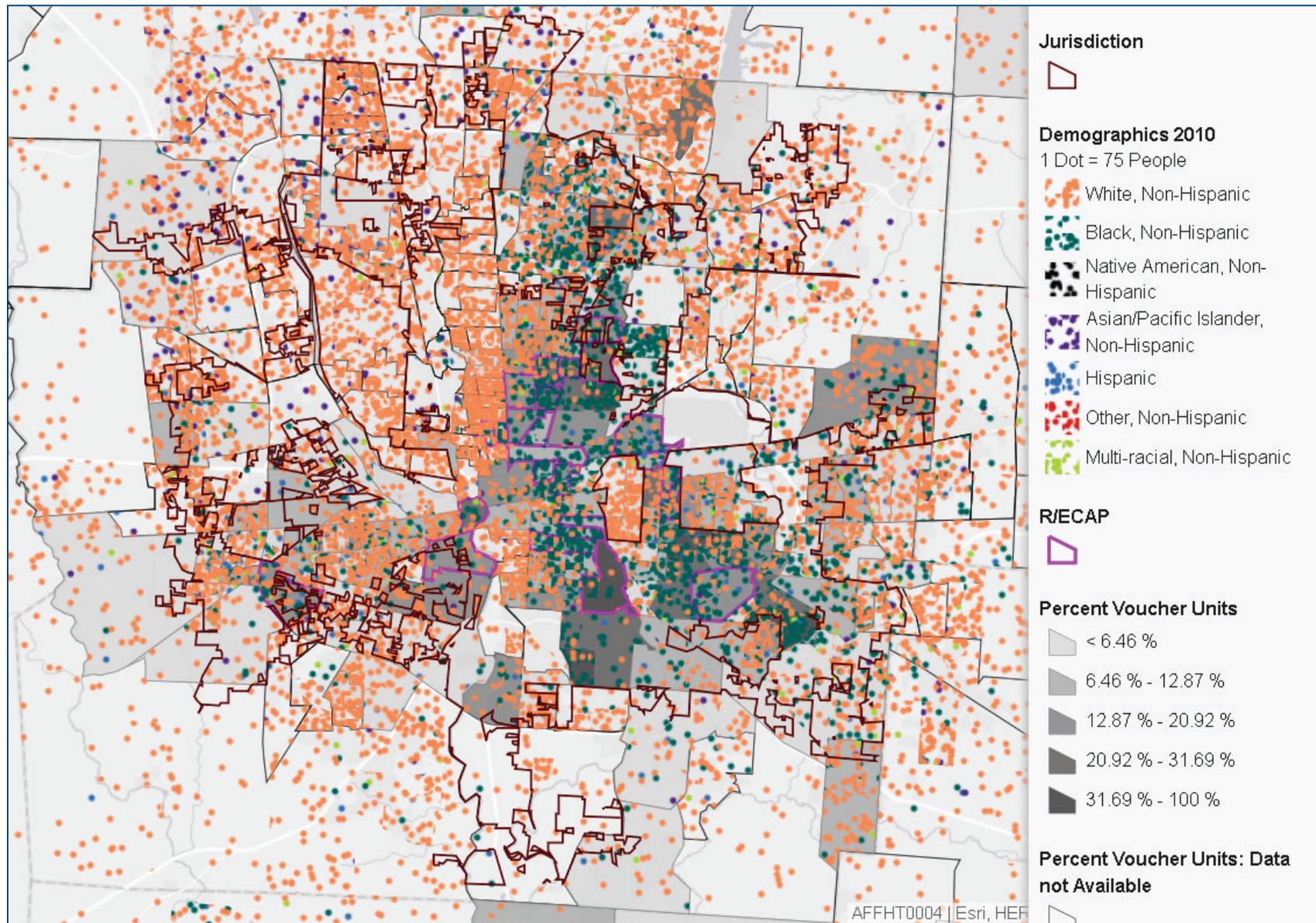


TABLE 16 – R/ECAP AND NON-R/ECAP DEMOGRAPHICS BY PUBLICLY SUPPORTED HOUSING CATEGORY

Housing Type and Location		Total Occupied Units	% White	% Black	% Hispanic	% Asian or Pacific Islander	% Families with Children	% Elderly	% with a Disability
City of Columbus									
Public Housing	R/ECAP Tracts	852	5.6%	92.4%	0.9%	1.2%	71.9%	10.6%	9.0%
	Non R/ECAP Tracts	511	15.7%	83.1%	1.2%	0.0%	45.8%	45.2%	30.9%
Project-Based Section 8	R/ECAP Tracts	1,670	19.8%	78.6%	1.0%	0.4%	46.6%	32.0%	14.5%
	Non R/ECAP Tracts	4,701	23.7%	71.6%	1.6%	3.0%	43.2%	30.8%	12.7%
Other HUD Multifamily Housing	R/ECAP Tracts	108	59.4%	40.6%	0.0%	0.0%	N/a	78.2%	20.2%
	Non R/ECAP Tracts	609	59.9%	37.7%	1.2%	1.3%	1.3%	74.5%	23.9%
HCV Program	R/ECAP Tracts	2,663	11.7%	87.4%	0.4%	0.2%	41.2%	17.2%	28.5%
	Non R/ECAP Tracts	7,214	20.9%	78.2%	0.6%	0.2%	44.9%	17.6%	28.6%
Franklin County									
Project-Based Section 8	R/ECAP Tracts	41	71.4%	28.6%	0.0%	0.0%	7.0%	34.9%	34.9%
	Non R/ECAP Tracts	1,288	66.4%	31.3%	1.1%	1.1%	29.5%	49.9%	14.4%
Other HUD Multifamily Housing	R/ECAP Tracts	-	-	-	-	-	-	-	-
	Non R/ECAP Tracts	421	79.2%	10.5%	0.2%	9.8%	N/a	93.9%	4.4%
HCV Program	R/ECAP Tracts	160	10.8%	89.2%	0.0%	0.0%	50.6%	13.5%	18.2%
	Non R/ECAP Tracts	1,605	31.0%	68.1%	0.3%	0.5%	42.1%	25.0%	30.1%

Note: Disability information is often reported for heads of household or spouse/co-head only. Here, the data reflect information on all members of the household.

Source: APSH

POLICY REVIEW

As a public housing authority, CMHA is the entity responsible for administering over 13,400 Housing Choice Vouchers that are used in many communities across the Columbus region and the organization also owns over 1,400 units of public housing distributed across many individual properties and locations. As required by HUD, the CMHA maintains a comprehensive Five-Year PHA Plan, with annual plan updates, as well as other program-specific policies. The most pertinent of these policies for review in this analysis is the CMHA's "Admissions and Continued Occupancy Policy", or ACOP and its Administrative Plan for the Housing Choice Voucher, Project-Based Voucher, and Shelter Plus Care Programs. These documents set policy for who may be housed by the CMHA and how those tenant households are selected. Four different aspects of the ACOP and/or Administrative Plan are examined here: tenant selection, local preference, tenant screening, and subsidy standards. These four policy types all allow some degree of local determination by CMHA and are among the most central to matters of fair housing choice.

Public housing, and particularly HCV assistance, is competitive and housing authorities often maintain lengthy waiting lists of potential tenants. For its public housing units, the CMHA keeps an active wait list with enough applicants to fill any expected vacancies over a 12-month period. When the list becomes so long that the households listed on it are not likely to rise to the top and be considered for housing within a 12-month timeframe the waiting list may be closed to new applicants until the list is diminished. For its voucher programs, the CMHA implements a multi-step system for filling vacancies. Applicants first submit a preliminary application and applications may be taken continuously. These applications constitute a "lottery pool" from which applicants are drawn as needed to fill the waiting list. An applicant's position on the waiting list is determined first by local preference criteria and then by the order drawn from the lottery pool.

The process by which applicants are ranked on and selected from a waiting list is guided by a tenant selection policy. Selection of public housing tenants from the CMHA's waiting list is determined first by the type and size of unit the family requires, any special preference criteria for which the household may qualify, followed by the date and time of the tenant's application. Ordinarily, a "date and time" standard for waiting list selection can be somewhat problematic for disadvantaging applicants who have inflexible, hourly work schedules or transportation and childcare challenges. In the case of the CMHA, however, application date and time is more akin to a tie-breaker given the unit size and preference criteria that are applied first. By randomizing applications for selection, the lottery pool step in the process for selecting voucher applicants provides more even footing and provides no advantage to a household that is able to access, complete, and submit a preliminary application more quickly than another.

HUD allows public housing authorities to, within narrow boundaries, set local preferences for the applicants who will be selected from their waiting lists. Local preferences must be constructed carefully to avoid discrimination against protected classes, but can be helpful tools to strategically adapt public housing programs to local housing needs and priorities as determined through data-driven planning processes. For both public housing and voucher programs, CMHA applies local preference criteria at some point in the tenant selection process. In public housing, the relatively simple preference criteria involve categorizing applicants as either "Tier 1" (household income between 31% and 80% of area median

income) or “Tier II” (household income between 0% and 30% of area median income) and selecting applicants according to these tiers such that properties have a balance of low and moderate-income households. The CHMA’s goal is to maintain some economic diversity within its public housing properties, with 50% of households from each of the two tiers.

The Administrative Plan’s preference criteria for the voucher programs are more varied. Applications selected randomly from the lottery pool will be ordered by the following preferences, in order of priority:

1. Referrals from social service and housing organizations providing supportive services to participants in CMHA’s Project-Based Voucher Program
2. Referrals from other local supportive service organizations
3. CMHA public housing families who elect to permanently relocate because of a Rental Assistance Demonstration (RAD) conversion at their development that requires relocation.
4. Family Composition Preference (i.e. families with 2 or more persons; families that include a person with disabilities; a household headed by a disabled or elderly person; or single persons who are age 62 or older, displaced, homeless or is a person with disabilities)
5. Families not receiving any permanent rental assistance
6. Under 30% of Area Median Income
7. Families residing in or who have been hired to work in the eight county Columbus Metropolitan Area (Franklin, Union, Delaware, Madison, Pickaway, Licking, Union and Fairfield)
8. Active duty military or veteran

The first two of these preferences are designed to direct housing opportunities to households who already have in place necessary relationships with supportive service providers to ensure more successful housing placements. The third criterion serves to open some of the CMHA’s most immediate voucher opportunities to tenants whose transfer into the voucher-based programs furthers strategic development opportunities of the CMHA. The fourth, sixth, and eighth preference criteria push toward the top of the waiting list households that are in particularly vulnerable or precarious housing situations. The seventh is a residency preference which, when narrowly tailored to a single specific community, can have the effect of limiting housing choice on a regional basis. In CMHA’s case, this preference, based on an eight-county region, avoids this criticism as it allows for a great degree of mobility within the greater Columbus region. Tenant screening, specifically policies regarding criminal background checks, is another aspect of this review. Housing authorities are required to consider an applicant’s criminal background as part of their screening process for public housing occupancy but must conduct the screening so as not to violate the prospective tenant’s fair housing rights. For Housing Choice Voucher (HCV) programs, tenant screening is optional for the housing authority. Recognizing that people of color are disproportionately more likely to have experienced an encounter with the criminal justice system and to have arrest records or criminal convictions, HUD issued guidance in 2016 warning that blanket policies of refusal to rent to people with criminal records could be discriminatory. Although criminal history is not a protected class, under the Fair Housing Act, restricting housing access on the basis of criminal history could be unlawful if it results in a disparate impact on people of a specific race or ethnicity. Rather than blanket policies, exclusions of persons with criminal histories must be tailored to the housing provider’s legitimate interests, be applied consistently to all applicants, and take into account the type of crime, time since conviction, and other factors.

CMHA has made efforts to moderate the influence of criminal background on tenant eligibility, while also supporting the safety of its residents and communities. The CMHA conducts criminal background checks on all adult household members named on a public housing application and may deny housing to a family because of drug-related criminal activity, violent criminal activity by family members, and/or registration on the National Sex Offender Registry. Federal regulations govern the barring of public housing admission in some of these cases, but CMHA limits its lookback for drug-related eviction history to a five-year period. If evidence of such history is found, CMHA may prohibit admission for a discretionary period of time of at least one year. Verifiable documentation of mitigating circumstances and/or evidence of completion of a supervised drug rehabilitation program may have a bearing on the length of a prohibition. For the voucher programs, CMHA's Administrative Plan sets a three-year lookback for drug-related or violent criminal activity, which is a shorter period than that used by many other housing authorities. Registered sex offenders are ineligible for voucher assistance regardless of the date of offense.

Finally, individual housing authorities are required to include in their policies the criteria by which they determine the number of bedrooms needed to house families of various sizes and compositions; these are known as subsidy standards. HCV families are not required to actually seek or rent dwellings with the number of bedrooms determined by the subsidy standard, but rather the standards determine the amount of the subsidy the family qualifies for based on its size. The CMHA's subsidy standards are strictly based on the number of people in a household, without regard for age, gender, or family relationship. The subsidy calculation allows for up to one bedroom for the head of household and co-head, and one bedroom (or living room/sleeping room) for every two additional household members. This is a rather neutral and objective method for determining subsidy standards and does not appear to raise any fair housing issues.

CHAPTER 8.

HOUSING FOR PEOPLE WITH DISABILITIES

According to the U.S. Census Bureau, 19% of the population reported having a disability in 2010. Research has found an inadequate supply of housing that meets the needs of people with disabilities and allows for independent living. The U.S. Department of Housing and Urban Development identified that approximately one third of the nation's housing stock can be modified to accommodate people with disabilities, but less than 1% is currently accessible by wheelchair users.⁴³

Identifying and quantifying existing accessible housing for all disabilities is a difficult task because of varying needs associated with each disability type. People with hearing difficulty require modifications to auditory notifications like fire alarms and telecommunication systems while visually impaired individuals require tactile components in design and elimination of trip hazards. Housing for people that have difficulty with cognitive functions, self-care, and independent living often require assisted living facilities, services, and staff to be accessible.

Modifications and assisted living arrangements tend to pose significant costs for the disabled population, which already experiences higher poverty rates compared to populations with no disability. Studies have found that 55% of renter households that have a member with a disability have housing cost burdens, compared with 45% of those with no disabilities.⁴⁴

RESIDENTIAL PATTERNS

In Columbus, an estimated 93,418 persons 5-years-old or older have a disability, representing 12.7% of this share of the total population. With a disabled population of 44,131 residents comprising 11.2% of the population, Franklin County's disability rate is proportionally lower. In both the city and county, people aged 18-64 have both the largest number of people with disabilities and the highest disability rate at 7.9% and 5.5%, respectively. Rates for other age groups are significantly lower; in Columbus, the rate for those over 65 is less than half, at 3.6%, and the rate for ages 55-17 is just 1.2%. These rates of disability all track relatively closely with those of the county and region.

Ambulatory disabilities are the most common type in the city and the county, affecting 6.7% and 5.6% of the populations, respectively. In both the city and county, following ambulatory disabilities in order of prevalence are cognitive, independent living, and hearing difficulties. Vision and self-care difficulties each affected under 3% of the populations of Columbus and Franklin County. The map that follows shows the geographic distribution of persons with disabilities throughout the area. People with disabilities are dispersed throughout the city and county. Looking at the underlying data for census tracts shows that areas where people with disabilities are most common include central Columbus and several tracts

⁴³ Chan, S., Boshier, L., Ellen, I., Karfunkel, B., & Liao, H. . L. (2015). Accessibility of America's Housing Stock: Analysis of the 2011 American Housing Survey. U.S. Department of Housing and Urban Development: Office of Policy Development and Research.

⁴⁴ America's Rental Housing 2017. (2017). Joint Center for Housing Studies of Harvard University.

immediately to the south and east, where rates of disabilities were over 20% for the most populous age group, 18-64. Highest disability rates for residents 65 and older were found in several tracts in the same general area, just east of downtown Columbus, although there are no individual tracts that had the highest rates for both age groups.

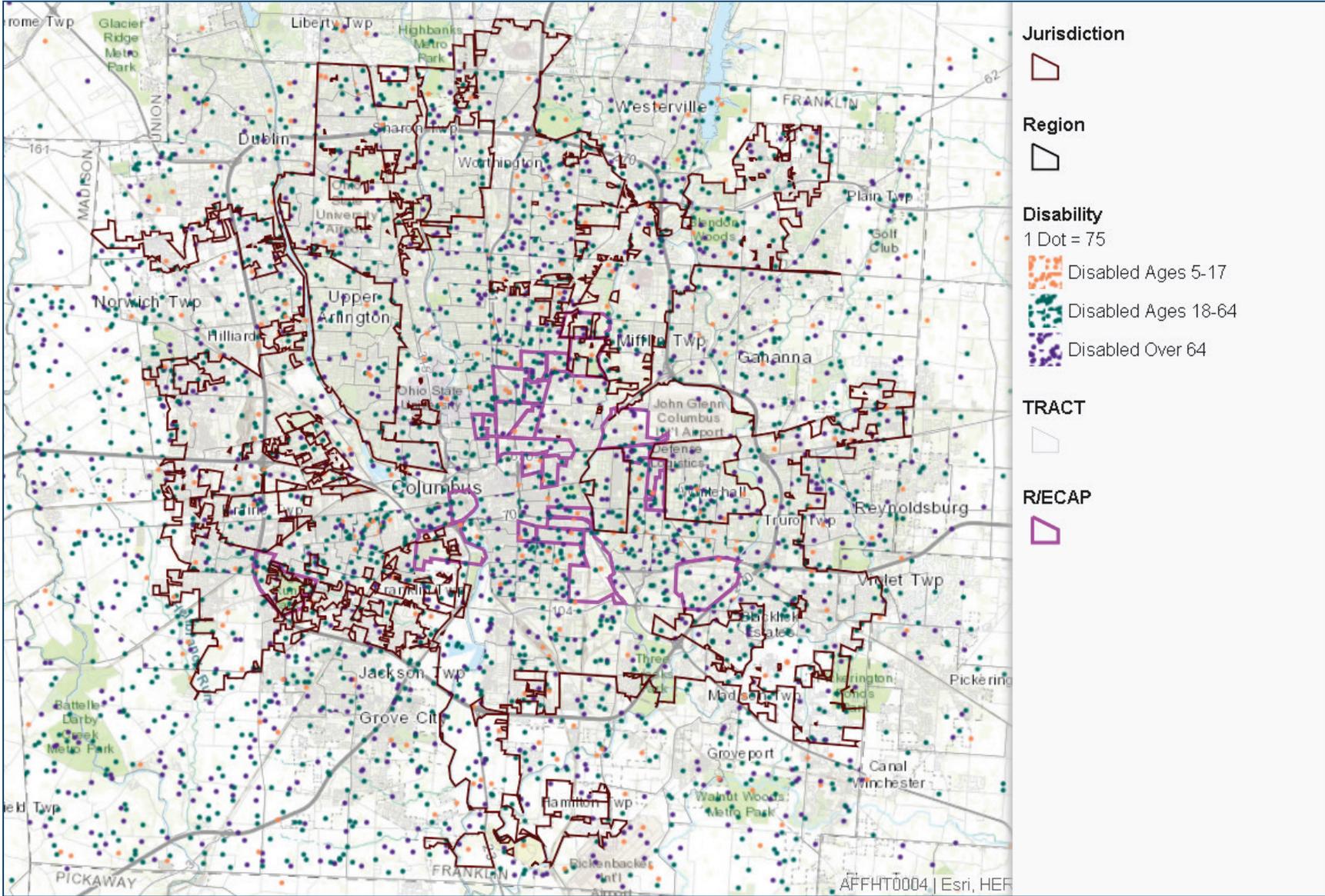
TABLE 17 – DISABILITY BY TYPE AND AGE GROUP

	City of Columbus		Franklin County		Columbus Region	
	#	%	#	%	#	%
Disability by Type						
Hearing difficulty	20,642	2.8%	12,162	3.1%	56,155	3.2%
Vision difficulty	15,909	2.2%	6,443	1.6%	35,590	2.0%
Cognitive difficulty	42,356	5.8%	17,702	4.5%	92,130	5.2%
Ambulatory difficulty	48,832	6.7%	22,185	5.6%	113,648	6.4%
Self-care difficulty	18,875	2.6%	8,184	2.1%	42,386	2.4%
Independent living difficulty	32,658	4.5%	15,969	4.1%	76,268	4.3%
Disability by Age Group						
Age 5-17 with disabilities	8,889	1.2%	4,469	1.1%	21,127	1.2%
Age 18-64 with disabilities	58,113	7.9%	21,734	5.5%	124,558	7.0%
Age 65+ with disabilities	26,419	3.6%	17,928	4.6%	74,563	4.2%

Note: All % represent a share of the total population within the jurisdiction or region.

Source: ACS

FIGURE 30. PEOPLE WITH A DISABILITY BY AGE IN THE CITY OF COLUMBUS



ACCESSIBLE HOUSING SUPPLY AND AFFORDABILITY

A search using HUD’s Affordable Apartment Search Tool was conducted to identify affordable rental properties in Franklin County designed to serve people with disabilities. The search returned 32 results; all but two had Columbus addresses, with the remaining two in Grove City and Hilliard. Only one of the of the listed properties offered units with more than one bedroom. A similar point-in-time search on apartmentguide.com for apartments with accessibility features currently for rent in the Columbus area returned 168 results, 14% of all available units on the site (1,200). Of the 168 total available accessible units only 51 were priced at \$900 or less per month, and only one advertised rent at less than \$500 per month.

Based on a standard Supplemental Security Income (SSI) payment of \$750 per month (equating to an affordable rent of \$225 or less), it is highly likely that people with disabilities who are unable to work and rely on SSI as their sole source of income, face substantial cost burdens and difficulty locating affordable housing. Publicly supported housing is often a key source of accessible and affordable housing for people with disabilities, and in Columbus, these subsidized housing options are 50% to 100% more likely to contain households with at least one member with a disability than the housing stock in general. With comparable overall rates of disability in Columbus and the county, the distribution of people with disabilities in the different types of publicly supported housing follows similar patterns, except that the 20 units of “other multifamily housing” in Franklin County were much less likely to contain disabled residents than units of the same type in Columbus. As the table below shows, persons with disabilities are able to access public housing, Project-Based Section 8, other subsidized multifamily housing, and HCV units. Housing Choice Voucher holders were more likely to be disabled than residents of any other type of publicly supported housing. In the region, the Other Multifamily category has a lower percentage of residents with disabilities than in the city, while the Public Housing category has a higher percentage.

TABLE 18 – DISABILITY BY PUBLICLY SUPPORTED HOUSING PROGRAM CATEGORY

Housing Type	People with a Disability					
	City of Columbus		Franklin County		Columbus Region	
	#	%	#	%	#	%
Public Housing	229	17.2%	-	-	299	20.9%
Project-Based Section 8	855	13.2%	210	15.1%	1,281	14.5%
Other Multifamily Housing	206	23.5%	20	4.2%	236	16.2%
HCV Program	2,999	28.5%	556	29.0%	4,784	29.6%

Note: The definition of “disability” used by the Census Bureau may not be comparable to reporting requirements under HUD programs.

Source: ACS

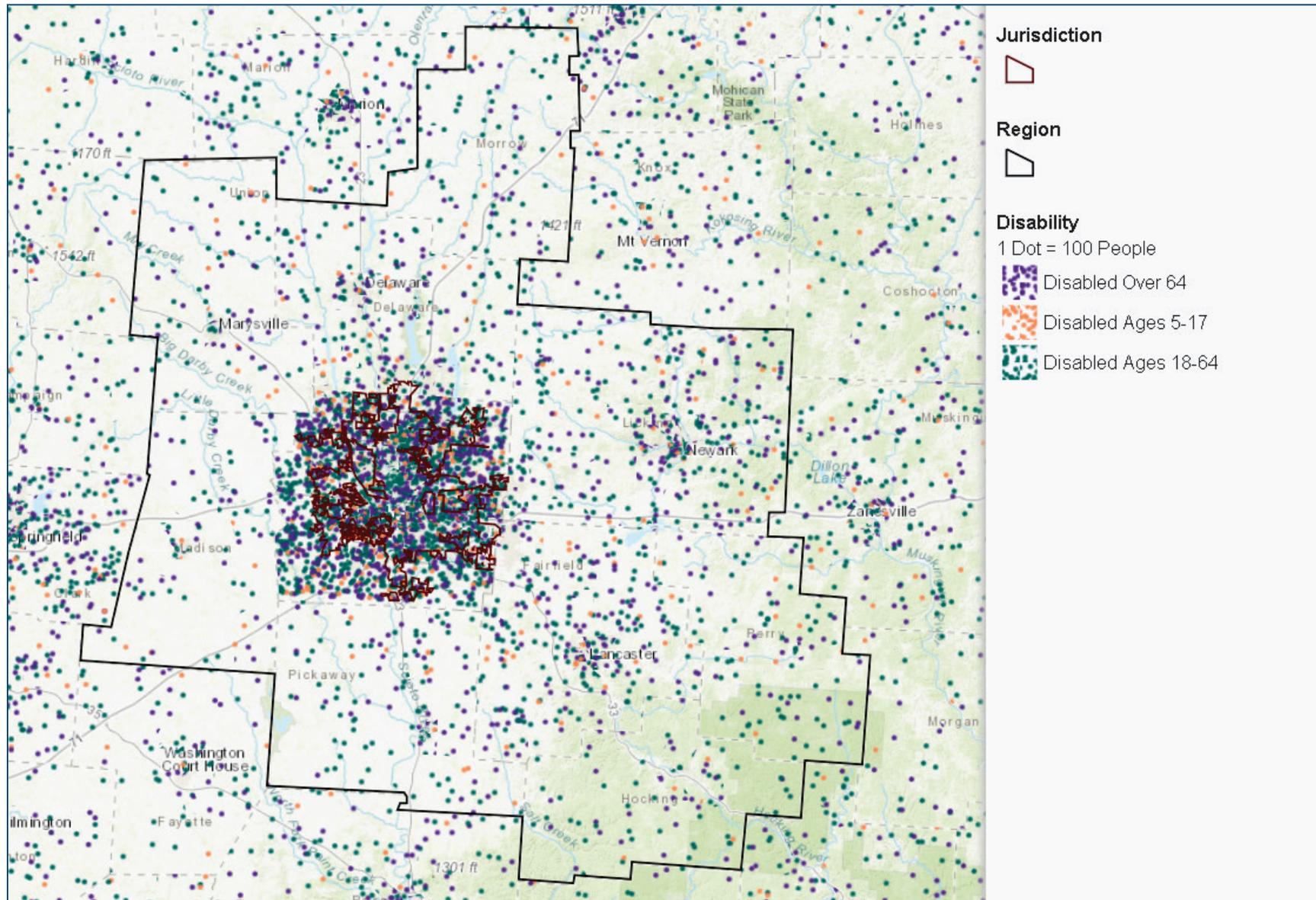
Supportive housing, a typically subsidized long-term housing option combined with a program of wrap-around services designed to support the needs of people with disabilities, is another important source of housing for this population. Unique housing requirements for people with an ambulatory difficulty may

include accessibility improvements such as ramps, widened hallways and doorways, and installation of grab bars, along with access to community services such as transit. For low- and moderate-income households, the costs of these types of home modifications can be prohibitive, and renters may face particular hardships as they could be required to pay the costs not just of the modifications, but also the costs of removing or reversing the modifications if they later choose to move.

ACCESS TO OPPORTUNITY

In Figure 30 there is no evident clustering or other inequitable geographic distribution of residents with disabilities within the city of Columbus or Franklin County. However, viewing the population with disabilities at the regional scale in Figure 31 shows that people with disabilities are tightly clustered in the region's urban core. This means that access to opportunity for the majority of residents, even those in the region, are more closely aligned with opportunity indicators for the city than for the region, likely including such factors as availability of public transportation and supportive services.

FIGURE 31. PEOPLE WITH A DISABILITY BY AGE IN THE COLUMBUS REGION



ZONING AND ACCESSIBILITY

From a regulatory standpoint, local government measures to control land use typically rely upon zoning codes, subdivision codes, and housing and building codes, in concurrence with comprehensive plans. Local zoning authority is directed by the state enabling laws as part of the local government's police power but limited by superseding state laws related to specific land use, for example the regulation of public property, flood plains, utilities, natural resources, airports, housing regulated by a state licensing authority for persons with disabilities, higher education institutions, etc. Conditions of the Columbus and Franklin County zoning codes affecting accessibility are assessed in the following section. Several elements of the following analysis refer back to the scored zoning code review presented in Chapter 6.

Definition of "Family" and Group Housing for Persons with Disabilities

Often one of the most scrutinized provisions of a municipality's zoning code is its definition of "family." Local governments use this provision to limit the number of unrelated persons who may live together in a single dwelling. Unreasonably restrictive definitions may have the unintended or intended (depending on the motivations behind the drafting of the jurisdiction's definition) consequence of limiting housing for nontraditional families and for persons with disabilities who reside together in congregate living situations. The City of Columbus defines "family" under its Building Code to include an individual or any number of individuals related by blood or marriage, or a group of not more than five individuals not so related, living together. Similarly, Franklin County's zoning code restricts the definition of family to only those related by blood or marriage, or not more than four unrelated persons sharing a common home. Under these definitions, foster care and adoption relationships are not treated as equally related as relationships by blood or marriage, which is problematic under due process scrutiny. Columbus's building code limits the size of a single or "one family dwelling" to not more than 5 residents. While the definition of "one family dwelling" does not distinguish between related or unrelated persons or treat differently persons with disabilities because of their disability, used together with the definition of "family," it could have the effect of treating families strictly related by blood or marriage better than families related by adoption, foster care, or other functionally or factually equivalent means.

Limiting single family to no more than 4 or 5 unrelated individuals is neither the most permissive nor most restrictive under case precedent, but does fail to treat nontraditional, but functionally equivalent, household relationships equal with those related by blood or marriage, and may violate fair housing, privacy, and due process protections. More permissive and neutral definitions of family do not distinguish between related and unrelated occupants as long as the residents live together as a functionally or factually equivalent family or common household sharing common space, meals, and household responsibilities, and/or leaves maximum occupancy per dwelling as a matter of safety under occupancy standards rather than the zoning regulations. While the Supreme Court has recognized a local government's right to limit the number of unrelated individuals who may live together as constitutionally permissible, the restriction must be reasonable and not exclude a household which in every sense but a biological one is a single family. An unreasonably, or arbitrarily, restrictive definition could violate state Due Process and/or the federal FHAA as it may have a disproportionate impact on people with disabilities, minorities, and families with children. The ordinance should be amended to explicitly include relationships based on adoption and foster/legal guardianship. Another option is to amend the ordinance to add an

administrative process for rebutting the presumption that a group exceeding the permitted maximum number of unrelated persons is not otherwise residing together as a single housekeeping unit and functional family. Accordingly, both Columbus and Franklin County received a “3” high risk score on Issue 1 of the matrix.

The family definitions do not distinguish between or treat persons with disabilities differently *because of* their disability, rather supportive housing services for persons with disabilities are regulated under the term “residential care facility” in Columbus and “adult family homes” or “adult group homes” under Franklin County’s ordinance. State law provides that “residential care facilities” (licensed facilities that provide accommodations, supervision, and personal care services for 3-16 unrelated adults) for 1 to 5 residents must be treated as a permitted use in any local residential district or zone and facilities for 6-15 residents must be permitted in any multifamily district or zone (but may be a conditional or special use in a planned unit development).

The Columbus zoning code regulates some housing for persons with disabilities under the term “residential care facility,” which is described as a dwelling “for providing supervised room, board and care in a residential setting to residents thereof whose disabilities or status limit their ability to live independently...The term shall not be applied to owner-occupied premises with one or two roomers....” In addition to any state licenses required, the owner or operator of a residential care facility may be subject to “rooming house” licensing requirements from the City, initial or annual inspections, and fees. Residential care facilities for less than 6 residents should be permitted by right in residential areas equally with other single-family uses, although they could also be subject to additional licensing and inspection requirements, presumably for the safety of the residents, beyond that required by state regulators. Residential care facilities for 6 or more residents are only permitted by right in the AR-O, AR-3, and AR-4 districts. However, this is not more restrictive than similarly situated housing for 6 or more unrelated individuals not requiring in-home, supportive services for disabilities.

Under Franklin County’s code, an “adult family home” is a residence or facility that provides accommodations to 3-5 unrelated adults and supervision and personal care services to at least three 3 adults. Adult family homes are a permitted use in the Rural District, R-1, R-2, R-4, R-8, and R-12 districts but not identified as a permitted use in the R-24 district. An “adult group home” is a residence or facility that provides accommodations for 6-16 unrelated adults and provides supervision and adult personal care services to at least 3 of the unrelated adults. While defined, the zoning code does not specifically identify in which districts an adult group home may be sited. The definitions reference Ohio Revised Code sections that have been repealed and renumbered (OHIO REV. CODE § 3722). Franklin County’s adult care facility definition specifically excludes homes providing hospice care, homes for the aging, “community alternative home,” and alcohol and drug addiction treatment programs, all of which may serve persons with disabilities. There is some inconsistency between the local ordinance and state law which has been revised recently. Because of the ambiguity between the County’s treatment of certain housing for persons with disabilities and the state’s regulations, the County received a “2” medium risk score on Issue #2. The zoning ordinance and table of permitted uses should be amended to resolve this ambiguity and make clear that housing for persons with disabilities may be sited as specifically permitted under state law and equally with other single-family housing for unrelated persons.

Reasonable Accommodations

Adopting a reasonable accommodation ordinance is one specific way to address land use regulations' impact on housing for persons with disabilities. Federal and state fair housing laws require that municipalities provide individuals with disabilities or developers of housing for people with disabilities flexibility in the application of land use and zoning and building regulations, practices, and procedures or even waive certain requirements, when it is reasonable and necessary to eliminate barriers to housing opportunities, or "to afford persons with a disability the equal opportunity to use and enjoy a dwelling." (The requirements for reasonable accommodation under the Americans with Disabilities Act (ADA) are the same as those under the FHA. 42 U.S.C. 12131(2).) However, the FHA does not set forth a specific process that must be used to request, review, and decide a reasonable accommodation.

Neither Columbus nor Franklin County have adopted a clear and objective process by which persons with disabilities may request a reasonable accommodation to zoning, land use, and other regulatory requirements. Rather both jurisdictions appear to rely on the variance process for such matters. In Columbus the City Council holds power to hear and decide applications for variances following the public notice and hearing process. The BZA has authority to decide variance requests within unincorporated Franklin County. This is required for any applicant seeking a variance and is not limited to housing for persons with disabilities. The purpose of a variance is not congruent with the purpose of requesting a reasonable accommodation, as a variance requires a showing of special circumstances or conditions applying to the land. In contrast, a reasonable accommodation is to allow individuals with disabilities to have equal access to use and enjoy housing. The jurisdiction does not comply with its duty to provide reasonable accommodation if it applies a standard based on the physical characteristics of the property rather than considering the need for modification based on the disabilities of the residents. The zoning code's variance process has been identified as an impediment both to development and to persons with disabilities seeking a uniform process for requesting a reasonable accommodation, and accordingly both jurisdictions received a "2" on Issue #3.

Whereas simple administrative procedures may be adequate for the granting of a reasonable accommodation, the variance procedures subject the applicant to the public hearing process where there is the potential that community opposition based on stereotypical assumptions about people with disabilities and unfounded speculations about the impact on neighborhoods or threats to safety may impact the outcome. Although the FHA does not require a specific process for receiving and deciding requests for reasonable accommodation, as a matter of equity, transparency, and uniformity, it is advisable that local jurisdictions adopt a standardized administrative process.

Supportive Housing for Persons Recovering from Alcohol or Substance Addiction

Under federal law (e.g. FHA, ADA, Rehabilitation Act), it is discriminatory to deny an individual or entity the right to site a residential treatment program in a residential zone because it will serve individuals with alcohol or other drug problems or mental health disabilities. Ohio's state law regulates "recovery housing" –defined as housing for individuals recovering from alcoholism or drug addiction that provides an alcohol and drug-free living environment, peer support, assistance with obtaining alcohol and drug addiction services, and other alcoholism and drug addiction recovery assistance – under Ohio Revised Code Ch. 340.

It distinguishes recovery housing from other residential care facilities in terms of licensing but does not specifically address zoning and siting of recovery homes in local residential zoning districts.

In Columbus halfway houses and “community residential treatment facilities” require a special permit approved by the Board of Zoning Adjustment and then may be located only in an I-institutional district, a C-4 commercial district, or an M-manufacturing district. While housing for persons with disabilities may be subject to state and local regulations related to health and safety, they cannot be excluded from residential districts altogether, and such regulations must not be based on stereotypes or presumptions about specific types of disabilities. Accordingly, for treatment facilities which house five or fewer unrelated persons recovering from drug or alcohol addiction, this disparate treatment may violate the FHA, and the City received a “3” high risk score on Issue #5. The County specifically excludes alcohol and drug addiction programs from the zoning code’s definition and use category of “family care facility” (adult family homes and adult group homes) but does not otherwise address the location or siting of residential substance abuse treatment facilities. Therefore, presumably as long as the facility otherwise met the definition of single-family dwelling, such housing should be permitted equally with single-family dwellings. But because the zoning code is not clear on this issue there is potential for ambiguity and unequal treatment, and the County received a “2” medium risk score on this issue.

CHAPTER 9.

FAIR HOUSING ACTIVITIES

FAIR HOUSING RESOURCES

Ohio was an early adopter of civil rights protections with its first statutory protections adopted in 1884 under the Ohio Public Accommodations Law. In 1965, Ohio amended its Laws Against Discrimination to include protections in housing. In 1992, Ohio again updated and amended its Fair Housing Law to purposefully bring the state law into “substantial equivalence” with federal fair housing standards, and since that update it has closely paralleled Title VIII of the Civil Rights Act of 1968, as amended by the Fair Housing Amendments Act of 1988, 42 U.S.C. §§ 3601 *et seq.* (the “FHAA”). Both the state and federal laws prohibit discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions based on sex, race, color, disability, religion, national origin, or familial status. To be certified as substantially equivalent, the state fair housing law must provide similar “rights, procedures, remedies, and the availability of judicial review that are substantially equivalent to those provided in the federal Fair Housing Act.” (24 C.F.R. § 115.201 *et seq.*) In passing House Bill 321, the Ohio Legislature declared it was necessary for the immediate preservation or the public peace, health and safety, and stated, “immediate action is required in order for Ohio’s Fair Housing Law to achieve substantial equivalency with the federal Fair Housing Act.” H.R. 321, 119th Gen. Assem., Reg. Sess. (Ohio 1992).

Substantial equivalence certification allows the state fair housing enforcement agency to apply for federal funding under HUD’s Fair Housing Assistance Program (FHAP). The Ohio Civil Rights Commission, created by the legislature in 1959 to administer and enforce the state’s antidiscrimination laws, partners with HUD and receives funding through the FHAP to receive, investigate, and enforce charges of housing discrimination.

Under its Fair Housing Initiatives Program (FHIP), HUD also has awarded an Education and Outreach Initiatives (EOI) grant to the Central Ohio Fair Housing Association (COFHA), which serves the Columbus metropolitan area. EOI grantees are charged with educating the public and housing providers about their rights and responsibilities under federal fair housing law. The grants also can support state and local organizations that enforce fair housing laws that are equivalent to the FHA. COFHA was allocated \$125,000 in grant funds in FY 2017. It has pledged to use its grant to inform the general public about their rights and obligations under the Fair Housing Act and substantially-equivalent state fair housing laws. COFHA will use professional curricula, brochures, fact sheets, and Public Service Announcements for radio, television, and internet, fair housing and fair lending workshops, utilizing localized materials from HUD’s national fair housing ad campaigns whenever possible. COFHA will provide Limited English Proficiency (LEP) individuals with information about and access to program benefits through translation and interpretation services in accordance with HUD’s published LEP Guidance. The project aims to reach underserved populations such as people with disabilities and recent immigrant populations. The project’s professional educational symposia will focus on the effective implementation of affirmative fair housing and fair lending strategies and will target property management staff, real estate agents, social workers

and discharge nurses who coordinate housing needs, local governments, and subsidized housing providers as well as architects, developers and others who make decisions on accessible design and construction.

FAIR HOUSING COMPLAINTS

An individual in Columbus or Franklin County who believes he or she has been the victim of an illegal housing practice under the FHA or Ohio Fair Housing Law may seek assistance from the Ohio Civil Rights Commission or file a complaint with the appropriate HUD Regional Office of Fair Housing and Equal Opportunity (FHEO) within one year of when the discriminatory practice occurred. Typically, once certified, HUD will refer complaints of housing discrimination that it receives back to the state or local FHAP agency for investigation, conciliation and enforcement activities. HUD policy favors having fair housing professionals based locally where the alleged discrimination occurred because it has found that a state or local agency's closer proximity to the site of the alleged discrimination provides greater familiarity with local housing stock and trends and may lead to greater efficiency in case processing. Because the Ohio Civil Rights Commission is a certified FHAP agency, most complaints filed with the HUD FHEO office will be referred back to the OCRC for investigation and enforcement.

The aggrieved party also may file a lawsuit in federal district court within two years of the discriminatory act (or in the case of multiple, factually-related discriminatory acts, within two years of the last incident). Where an administrative action has been filed with HUD, the two-year statute of limitations is tolled during the period when HUD is evaluating the complaint.

After the OCRC or FHEO receives a complaint, it will notify the alleged discriminator (respondent) and begin an investigation. During the investigation period, the agency will attempt through mediation to reach conciliation between the parties. If no conciliation agreement can be reached, the OCRC/FHEO must prepare a final "Determination" report finding either that there is "reasonable cause" to believe that a discriminatory act has occurred or that there is no reasonable cause. If the agency finds "reasonable cause," HUD must issue a "Charge of Discrimination." If the investigator determines that there is no "reasonable cause," the case is dismissed. The advantages of seeking redress through the administrative complaint process are that the OCRC/FHEO takes on the duty, time, and cost of investigating the matter for the complainant and conciliation may result in a binding settlement. However, the complainant also gives up control of the investigation and ultimate findings.

If a charge is issued, a hearing/trial will be scheduled before an administrative law judge. The ALJ may award the aggrieved party injunctive relief, actual damages, and impose civil penalties; but unlike federal district court, the ALJ may not impose punitive damages. Administrative proceedings are generally more expedited than the federal court trial process.

Housing discrimination claims may be brought against local governments and zoning authorities and against private housing providers, mortgage lenders, or real estate brokers.

Complaints Filed with HUD

Region Five of the Office of Fair Housing and Equal Opportunity (FHEO) receives complaints by households regarding alleged violations of the Fair Housing Act for cities and counties throughout Ohio (as well as

Illinois, Indiana, Michigan, Minnesota, and Wisconsin). To achieve its mission of protecting individuals from discrimination, promoting economic opportunity, and achieving diverse, inclusive communities, the FHEO receives and investigates complaints of housing discrimination, and leads in the administration, development, and public education of federal fair housing laws and policies.

A request was made to the HUD regional office for complaints received regarding housing units in Columbus and Franklin County for the previous five-year period. The Chicago Regional Office of FHEO maintains data reflecting the number of complaints of housing discrimination received by HUD, the status of all such complaints, and the basis/bases of all such complaints.

From January 1, 2013 through July 2018, HUD received 148 formal complaints of alleged housing discrimination occurring within the jurisdiction of the City of Columbus and 78 complaints for other cities in Franklin County. The complete data tables provided by HUD are included as an appendix to this report with the HUD case file number, violation City, filing date, closure date, basis of complaint, issues cited, closure reason, and monetary relief provided for each filed case for the years 2013 – 2018.

The number of complaints for each by basis of discrimination are shown for Columbus and other Franklin County jurisdictions in the tables below:

TABLE 19 – HUD FAIR HOUSING COMPLAINTS BY BASIS

Basis	2013	2014	2015	2016	2017	2018	Total
City of Columbus							
Color	1	1	1	2	0	0	5
Disability	7	17	13	7	23	11	78
Familial Status	1	2	5	2	2	1	13
National Origin	4	3	5	0	2	2	16
Race	10	11	10	9	11	4	55
Religion	1	1	2	1	0	1	6
Retaliation	2	1	4	1	8	1	17
Sex	3	5	4	0	5	0	17
Franklin County							
Color	0	2	0	0	0	0	2
Disability	7	7	3	9	10	5	41
Familial Status	3	2	2	1	2	0	10
National Origin	0	2	0	1	2	0	5
Race	4	6	6	2	4	1	23
Religion	0	1	0	1	1	0	3
Retaliation	0	4	3	2	5	1	15
Sex	0	3	0	1	0	0	4

Source: HUD Region V Office of Fair Housing and Equal Opportunity

More than one basis of discrimination may be cited in a single complaint. Regarding Columbus, for the survey period, disability was cited in 78 complaints as the basis of discrimination, followed by race in 55 cases, sex in 17 cases, retaliation in 17 cases, national origin in 16 cases, familial status in 13 cases, religion in 6 cases, and color in 5 cases. For Franklin County, the numbers show disability was cited in 41 complaints as the basis of discrimination, followed by race in 23 cases, retaliation in 15 cases, familial status in 10 cases, national origin in 5 cases, religion in 3 cases, and color in 2 cases.

Also, more than one discriminatory act or practice, recorded as the discriminatory *issue*, may be cited in a single complaint. For the reported cases the discriminatory issues identified included failure to make a reasonable accommodation or modification; discrimination in terms/conditions/privileges relating to rental; discriminatory refusal to rent and negotiate for rental; discrimination in terms/conditions/privileges relating to sale; discriminatory terms, conditions, privileges, or services and facilities; discrimination in the terms/conditions for making loans; discriminatory acts under Section 818 (coercion, etc.); discriminatory refusal to negotiate for sale; false denial or representation of availability; non-compliance with design and construction requirements (handicap); discrimination in the appraising of residential real property; and otherwise deny or make housing unavailable .

At the time of response, 20 Columbus cases were open/pending and 128 cases had been closed. Of the closed cases, 74 were closed after investigation and a no cause determination; 24 were withdrawn by the complainant after resolution; 2 were withdrawn by complainant without resolution; 12 were successfully resolved by conciliation; 8 were administratively closed because the complainant failed to cooperate in the process; 5 were closed for lack of jurisdiction; and 1 was closed after FHAP judicial dismissal. At the time of response, 5 Franklin County cases were open/pending and 73 cases had been closed. Of the closed cases, 30 were closed after investigation and a no cause determination; 25 were withdrawn by the complainant after resolution; 4 were withdrawn by complainant without resolution; 5 were successfully resolved by conciliation; 3 were administratively closed because the complainant failed to cooperate in the process; 5 were closed for lack of jurisdiction. In the cases resolved by settlement / conciliation, the respondents did not necessarily admit liability, but may have settled to avoid further expense, time, and the uncertainty of litigation. Monetary damages totaling \$44,078 were reported for the cases resolved by settlement or conciliation in Columbus and \$29,123 in Franklin County, though not all settled cases ended in monetary damages being awarded.

Complaints Filed with the Ohio Civil Rights Commission

A request also was made to the OCRC for data reflecting the number of housing discrimination related complaints received by the Commission regarding housing units in the City of Columbus or Franklin County. As of the writing of this report, the OCRC has not responded to the request.

Complaints Filed with the Columbus Community Relations Commission

The Community Relations Commission (CRC) is charged by City Code with the enforcement of Columbus ordinances regarding prohibition of discrimination in the areas of employment, housing, public accommodations, interfering with civil rights, racial profiling, and ethnic intimidation. The CRC provided data on the annual numbers of housing complaints it investigated between 2007 and 2017. During that time period, a total of 69 complaints were investigated, but further information on the bases and outcome

of these complaints could not be isolated from the CRC's data. While the average number of annual housing complaints was just over six per year, the average is skewed by a count of 27 housing-related complaints filed in 2014. In the three years since then (2015-2017), a total of just four housing complaints were investigated by the Commission.

Complaints Received by the Columbus Urban League

The Columbus Urban League provides mediation and counseling services between low and moderate income tenants and landlords in the Columbus and Central Ohio area to try to prevent homelessness and resolve fair housing disputes. The CUL will investigate and pursue housing discrimination complaints and conduct housing discrimination testing. It also provides educational workshops, seminars, and materials on fair housing laws and regulations to local landlords. So far in 2018, the CUL has received 8 complaints of housing discrimination, and one case has been referred to the Ohio Civil Rights Commission for further investigation.

FAIR HOUSING LAWSUITS AND LITIGATION

An aggrieved party may seek redress of housing discrimination in state or federal court. Over the recent five-year period—January 1, 2013 through August 2018—there have been at least 17 federal lawsuits filed or litigated concerning properties, lenders, and/or housing providers in the Columbus and Franklin County areas. The following is a summary of those cases, organized by the general FHA basis or issue, which illustrate possible impediments to fair housing choice in Columbus and Franklin County.

Discriminatory Lending / Redlining

- United States v. Union Savings Bank, Civil Action No. 1:16cv1172 (S.D. Ohio) (complaint filed Dec. 28, 2016; consent order Jan. 3, 2017).

The Department of Justice filed this complaint against Union Savings Bank and Guardian Savings Bank, alleging that the two related banks, which share common ownership and management, engaged in a pattern or practice of redlining in their residential real estate lending businesses between 2010-2014 in majority-black neighborhoods in parts of Indiana and Ohio, including in Columbus. "Redlining" refers to the discriminatory practice by banks or other financial institutions of denying or avoiding providing credit services to consumers because of the racial demographics of the neighborhood in which the consumer lives or seeks to live. The complaint alleges that the defendant banks violated the Fair Housing Act and the Equal Credit Opportunity Act, which prohibit financial institutions from discriminating on the basis of race and color in their mortgage lending practices.

The Court entered a Consent Order after the parties agreed to a \$9 Million settlement designed to promote more equal lending services. Without admitting liability, the banks agreed to allocate \$7 Million to a loan subsidy fund to increase the amount of credit that the banks extend to residents of majority African American census tracts—including in the Columbus metropolitan area—and \$2 Million of investment in credit needs assessment, community outreach, advertising, and consumer repair and education. Union also agreed to open two full-service branches and Guardian agreed to open one loan production office to serve the residents of African American neighborhoods. Finally, the settlement also

requires both banks to develop robust internal controls to ensure compliance with fair lending obligations and to conduct fair lending training for their employees.

Discriminatory and Inadequate Design, Construction, and Accessibility of Covered Multifamily Housing

- Miami Valley Fair Housing Center, Inc. v. Preferred Real Estate Investment, Inc., Civil Action No. 2:15-cv-2737 (S.D. Ohio) (complaint filed Aug. 19, 2015).

In this lawsuit, MVFHC, a fair housing advocacy and testing organization, alleged that five multifamily apartment complexes designed, constructed, and managed by Defendants in and around Columbus—Palmer House, Clifton Park, Andover Park, Alexander Square, and Taylor House (the “Subject Properties”)—were not designed or constructed in conformity with the accessibility requirements of the FHAA (42 U.S.C. § 3604(f)(3)(C)), and that thereby Defendants have and continue to unlawfully discriminate against people with disabilities and limit their choice of housing. The complaint identified what Plaintiff claimed, after conducting testing of the Subject Properties, were inadequate accessibility features, including: ground-floor units without accessible routes to amenities and clubhouses; leasing offices with steps leading to the entrance; curbs without curb cuts; out-of-reach light switches and electrical outlets; and insufficient floor space for wheelchairs at toilets, sinks and bathtubs.

Preferred Real Estate has developed 12 apartment communities in Columbus, with three more planned for the near future. The lawsuit asks Preferred Living to retrofit existing complexes to comply with federal accessibility law and to design future buildings so they comply as well. It also seeks compensatory and punitive damages.

The Defendants denied liability and have argued that as shown by the permits and occupancy certificates issued for the subject properties, their buildings do meet the minimum design and construction obligations of § 3604(f)(3)(C) because they are in compliance with the relevant Ohio Building Code, which incorporates the ANSI A117-1.

As of the writing of this report, the district court has not ruled on the merits of the parties’ arguments, but has asked the parties to brief the court regarding whether the relevant OBC incorporates in part or in whole the 2009 ANSI or 2003 ANSI and whether a multifamily dwelling covered by the FHAA that was designed and constructed in compliance with the 2009 ANSI or 2003 ANSI would satisfy all of the FHAA’s design and construction requirements or satisfy some part of them, such as the adaptive design requirements. (Order, July 18, 2018).

- Miami Valley Fair Housing, Inc. v. Metro Development, LLC, Civil Action No. 2:16-cv-00607 (S.D. Ohio) (complaint filed June 24, 2016).

In this factually similar lawsuit, MVFH sued the developers, builders, designers, management company, and owners of Northpark Place and seven other multifamily apartment complexes in and around Columbus for allegedly failing to design and construct these properties in compliance with the accessibility requirements of the FHAA. The complaint alleged that after testing at the properties, Plaintiff determined that many of the covered dwelling units lack accessible bathrooms, sufficient floor space to maneuver a wheel chair, accessible routes, adequate curb cuts, and/or accessible amenities, rendering these units

unavailable to persons with disabilities. As in the case against Preferred Real Estate, the Court found that MVFH (but not Central Ohio Fair Housing Center) had organizational standing to bring the claims against the Metro Development defendants, but, as of the writing of this report, had not yet ruled on the merits of the lawsuit.

A joint status report is due to the court on September 13, 2018, to further update the court regarding the progress of discovery.

Discriminatory Treatment Based on Race and Color

- Columbus Housing Partnership, Inc. v. Dominion Homes, Inc., Civil Action No. 2:12-cv-00111-GLF-MRA (S.D. Ohio) (complaint filed Feb. 6, 2012; settled and voluntarily dismissed Jan. 28, 2013).

This case arises out of an alleged breach of contract between Columbus Housing Partnership, Inc. (“CHP”), a nonprofit organization whose mission is to develop quality, affordable housing for low- to moderate income families in Columbus and central Ohio, and Dominion Homes, a housing developer who had agreed to partner with CHP to develop 54 affordable rental townhome units on land owned by Dominion within the Village at Hilliard Run subdivision in Columbus. The parties sought low income tax credit approval for the project. The complaint claims that the affordable units would have been primarily occupied by persons of color and families with children in an area that is predominately made up of white residents. The suit alleges that Dominion cancelled the option contract with CHP following organized opposition from neighbors to the proposed development; news stories and letters posted with inflammatory statements like, “we do not need these government assisted people moving into this area”; and unsubstantiated claims that low-income housing would bring down property values and increase crime. Dominion then notified neighbors that it was aware of the opposition and that instead of selling the acreage to CHP it would continue to build out the site itself without the affordable units.

The complaint pleaded claims for violation of the FHA and Ohio Revised Code § 4112.02 based on race, color, and familial status; breach of contract; and fraud. Defendants denied liability and filed a counterclaim. However, after a mediation conference was held between the parties on December 10, 2012, the parties reached a confidential settlement and voluntarily dismissed the lawsuit on January 28, 2013, with the court retaining jurisdiction to enforce the terms of the settlement.

- National Fair Housing Alliance, Inc. v. Federal National Mortgage Assoc. (“Fannie Mae”), Civil Action No. 4:16-cv-06969 (N.D. Cal.) (complaint filed Dec. 5, 2016).

In this case, 21 fair housing advocacy organizations filed suit against Fannie Mae after an extensive nationwide investigation of over 2,300 REO properties covered by the FHA in major metropolitan areas including in Columbus. Plaintiffs alleged that, after the housing crisis in 2008, Fannie Mae failed to perform basic maintenance on foreclosed REO properties it owned in minority neighborhoods around the country, even while it did perform routine maintenance on properties it came to own in predominantly white neighborhoods. As in other cities investigated, testers found in Columbus differing maintenance and differing treatment based on neighborhood racial composition of otherwise similarly situated REO properties as REO properties in predominantly white neighborhoods in Columbus were far more likely to have a small number of maintenance deficiencies or problems than REO properties in communities of color, while REO properties in communities of color were far more likely to have large numbers of such

deficiencies or problems than those in predominantly white neighborhoods. The plaintiffs claimed that Fannie Mae's discriminatory maintenance, marketing, and sale of dwellings based on homeowners' race or national origin, depressed property values in communities of color, undermined neighborhood stabilization, and curtailed economic recovery, in violation of the Fair Housing Act.

Fannie Mae denied liability and filed a motion to dismiss. In ruling on Defendant's motion to dismiss, the Court found that Plaintiffs sufficiently alleged statistical evidence demonstrating a fair inference of causation between Fannie Mae's delegation of duties and the differential maintenance of properties in communities of color to support a claim, though it reserved the ultimate question of proof for summary judgment motions or later proceedings. As of the date of this report, Fannie Mae had filed a motion to dismiss Plaintiffs' amended complaint for failure to state a claim, and the court had set the matter for a hearing and oral arguments to be held on November 2, 2018.

- National Fair Housing Alliance v. Deutsche Bank, Civil Action No. 1:18-cv-00839 (N.D. Ill) (complaint filed Feb. 1, 2018).

The allegations in this lawsuit are similar to the allegedly egregious conduct of Fannie Mae in the previously discussed case. Plaintiffs are private fair housing organizations that investigated thousands of REO properties across 30 metropolitan areas, including in Columbus, owned by defendant banks and maintained and serviced by other defendant companies. The complaint alleges that the Deutsche Bank-owned homes located in predominantly white census block groups were better maintained and exhibited fewer objective routine maintenance and marketing deficiencies than the Deutsche Bank-owned properties that were located in neighborhoods comprised primarily of African Americans and/or Latinos. Plaintiffs presented findings that this disparity was observed in Columbus the 25 REO properties investigated there. Plaintiffs' complaint purported that Defendants discriminated against predominately black and Latino communities of color in the exterior maintenance and marketing of REO properties and that their policies and conduct (a) constitute intentional discrimination; (b) perpetuate segregation; (c) have a disproportionate adverse impact on minority communities that is not justified by any valid business purpose; and (d) interfere with the enjoyment of rights protected under the FHA. Defendants filed a motion to dismiss on May 9, 2018, disputing the adequacy of Plaintiffs' methodology and adequacy of pleading the elements of discrimination, among other denials of liability, to which the Plaintiffs filed a response. As of the date of this report, the court had not yet ruled on defendants' motion.

Discriminatory Failure to Provide a Reasonable Accommodation or Modification

- Vasandani v. Dublin Green Condominium Owners' Assoc., Inc., Civil Action No. 2:14-cv-00059 (S.D. Ohio) (complaint filed Jan. 16, 2014; dismissed Dec. 16, 2014).

Plaintiff, the owner of a condominium unit in Dublin, Franklin County, and a person whose disability limits her ability to walk and other activities of daily living, alleged that Defendants refused to make a reasonable accommodation in their policy of not de-icing the sidewalk and parking area and only removing snow outside Plaintiff's condominium when it reached two inches or more, despite knowing of her disability and the dangers posed by failure to accommodate her disability. After repeated requests for a reasonable accommodation to the policy were denied, Plaintiff was injured in a slip and fall accident on the ice outside her condo. She filed this lawsuit against the owners' association and property manager under the FHAA

and Ohio Fair Housing laws, 42 U.S.C. § 3604(f)(3)(B); 24 CFR § 100.204; R.C. § 4112.02(H)(19). The parties settled Plaintiff's claims and filed a voluntary dismissal on December 16, 2014.

- Frail v. Bernard, Civil Action No. 2:17-cv-00357 (S.D. Ohio) (complaint filed April 27, 2017; stipulation of dismissal Aug. 14, 2017).

The aggrieved plaintiff in this case had a diagnosed chronic mental illness and anxiety disorder after serving in the military. His treating psychiatrist prescribed an emotional support animal (ESA) to mitigate his symptoms. The plaintiff provided this information from his physician to the owner/manager of the Ravin Ridge apartment complex in Columbus and requested that they waive the pet fee. However, the suit alleges that defendants refused to make a reasonable accommodation and instead charged plaintiff a nonrefundable pet fee plus monthly fees for the remainder of his lease term. The suit also alleges that the defendants are liable for unlawful retaliation after threatening to charge plaintiff a higher monthly fee if he pursued legal action. Defendants denied that they were required to waive the pet fees for an "untrained" service animal and denied liability. Following mediation, the parties settled the claims and voluntarily dismissed the case on August 14, 2017.

- Heer v. The Enclave, Civil Action No. 2:18-cv-00574 (S.D. Ohio) (complaint filed June 11, 2018; dismissed Aug. 21, 2018).

In this action, the aggrieved plaintiff claimed that she was a tenant/renter of the condominium association and attempted to have a service support animal because of her disability. Plaintiff provided Defendants with documented medical evidence from her physician of her need for the support animal. However, she alleges that the Defendants through their attorney rejected her request in writing for the emotional support dog, citing a "no dog community" policy. Plaintiff and her family then moved out of the dwelling. Fair Housing Advocates Association, Inc. (FHAA) assisted Ms. Heer in investigating this matter and joined the lawsuit as a plaintiff. Within weeks of serving defendants, the parties filed a notice of settlement and the case was voluntarily dismissed on August 21, 2018.

- Dixon v. MNM Home Rentals Group, LLC, Civil Action No. 2:16-cv-00748 (S.D. Ohio) (complaint filed July 29, 2016).

The alleged facts stated that the plaintiff had been renting a single family home in Columbus from defendants since February 2015 using a Section 8 voucher provided through Columbus Metropolitan Housing Authority (CMHA). In June 2016, plaintiff provided defendants with medical documentation showing that conditions in the neighborhood were contributing to her two minor sons' documented mental health disorders, and requested that defendants grant a reasonable accommodation of releasing the tenant from her lease due to her children's medical need for a different type of housing. CMHA's policies require a notarized mutual lease rescission agreement be signed by both the landlord and the tenant prior to issuing the tenant a new voucher for a new rental property. By letter through their attorney, Defendants refused Plaintiff's request unless she met a list of conditions first. This lawsuit followed. Following a court ordered settlement conference, the parties reached a settlement on plaintiff's claims and voluntarily dismissed on September 23, 2016.

- Entine v. Lissner, Civil Action No. 2:17-cv-00946 (S.D. Ohio) (complaint filed Oct. 26, 2016; voluntarily dismissed May 29, 2018).

Plaintiff was a student at Ohio State University in Columbus, who because of her disability required a service animal. She requested and was initially granted a reasonable accommodation to the University's "no pet policy." However, when her accommodation supposedly came into conflict with another resident's dog allergy, the University's ADA compliance officer gave her notice that either she would have to move or the service animal would have to be removed because the other student had entered into a lease for the housing first. Plaintiff sued the university for violation of the ADA, FHAA, Rehab Act, and state law. At the preliminary injunction stage, the court sided with plaintiff because it found the University had not performed the proper inquiry of two competing reasonable accommodation requests. The court held a settlement conference for the parties who eventually reached an agreement and voluntarily dismissed the lawsuit on May 29, 2018.

- Parson v. Capital Realty Group, Civil Action No. 2:15-cv-03024 (S.D. Ohio) (complaint filed Nov. 20, 2015; settled and dismissed April 5, 2016).

In this action, plaintiff, who is described as disabled and bed-ridden, alleged that defendants, the owner and manager of Eastland Manor senior living apartments in Franklin County, refused to assist her home health aids with preparing the apartment for treatment of bed bugs or to provide a reasonable accommodation, and instead sought to evict her on the belief that because of her disabilities and despite her assistance from regular home health nurses and aids, she should not be living in an independent living facility. The parties subsequently reached a settlement and the lawsuit was voluntarily dismissed on April 5, 2016.

- Ragland v. EZ Home Solutions Group, LLC, Civil Action No. 2:16-cv-00749 (S.D. Ohio) (complaint filed July 29, 2016; settled and dismissed Sept. 23, 2016).

The complaint in this case stated that the Plaintiff had been renting a single-family home in Columbus from defendants since February 2014 using a Section 8 voucher provided through Columbus Metropolitan Housing Authority (CMHA). In May 2016, Plaintiff's mental health care providers determined that her mental illness symptoms were escalating as a result of living in a high crime neighborhood with routine, frequent gun violence in the immediate vicinity of her residence. Through her attorney, Plaintiff provided Defendants with medical documentation of her mental disabilities and evidence that her condition was exacerbated by her current housing conditions and requested that Defendants provide Plaintiff with the reasonable accommodation of releasing Plaintiff from her rental lease agreement due to medical necessity. CMHA's policies require a notarized mutual lease rescission agreement be signed by both the landlord and the tenant prior to issuing the tenant a new voucher for a new rental property. However, Defendants questioned the veracity of Plaintiff's disability and refused to cooperate with the requested lease rescission. This FHA lawsuit followed. A settlement conference was held with the court, and on September 23, 2016, the parties filed a voluntary stipulation of dismissal upon reaching a settlement of Plaintiff's claims.

- Tracey v. Hardiman, Civil Action No. 2:14-cv-00484 (S.D. Ohio) (complaint filed May 23, 2014; settled and dismissed Nov. 14, 2014).

At the time of this complaint, Plaintiff was a resident of Wildwood Village Apartments in Franklin County with a Section 8 voucher through Columbus Metropolitan Housing Authority (“CMHA”) that provides a federal subsidy to pay part of her rent. Plaintiff’s psychiatrist recommended that she get a companion dog to mitigate the symptoms of her mental disorder and anxiety. Plaintiff got an emotional support dog and then submitted a form for an accommodation to the property manager for her apartment. Defendant claimed that Plaintiff violated the terms of the lease and threatened to evict her. Fearing eviction would cause termination from the rental assistance program, but dependent upon her emotional support animal, Plaintiff filed a lawsuit under the FHAA for Defendants’ failure to grant a reasonable accommodation with additional claims for emotional distress. The parties reached a settlement and filed a voluntary stipulation of dismissal on November 14, 2014.

- Douglas v. Vesta West Bay, LLC, Civil Action No. 2:13-cv-00066 (S.D. Ohio) (complaint filed Jan. 25, 2013; settled and dismissed Oct. 18, 2013).

Plaintiff brought this action under the FHAA and the Rehabilitation Act, alleging she was improperly accused of drug dealing in her rent subsidized apartment when in fact the various visitors were home health aides, nurses, family and friends that assisted her due to her disabilities. The complaint stated that by denying Plaintiff the reasonable accommodation of having her aides and family visit her apartment unit as needed, demanding Plaintiff re-certify her income eligibility four months earlier than required, and filing a frivolous eviction against her forcing her to vacate the apartment, defendants had unlawfully coerced, intimidated, threatened and interfered with her exercise and enjoyment of her rights under the FHA. Prior to adjudication on the merits of Plaintiff’s complaint or the Defendants’ motion to dismiss, the parties settled the claims and filed a voluntary dismissal on October 18, 2013.

- Keaton v. Tall Oaks Realty, LLC, Civil Action No. 2:15-cv-02649 (S.D. Ohio) (complaint filed July 23, 2015; settled and dismissed May 23, 2016).

In this FHAA action against the owners and managers of an apartment in Columbus, Plaintiff and the Fair Housing Advocates Association alleged that Defendants refused to reasonably accommodate her documented medical condition when they repeatedly failed to repair the air conditioning in her apartment, and then unlawfully retaliated against her for her complaints by instituting eviction proceedings for non-payment of rent. Prior to filing this lawsuit, Plaintiff filed a complaint with the Ohio Civil Rights Commission on July 28, 2013. The Commission found that it was not probable that Defendants engaged in practices unlawful under Ohio Rev. Code § 4112 et seq. (Ohio Fair Housing Law); however, Plaintiff asserts that Defendants misled the Commission with false statements. The court set a date for mediation, and the parties filed a voluntary stipulation of dismissal following settlement on May 23, 2016.

- Painter-Payne v. Vesta West Bay, Civil Action No. 2:12-cv-00912 (S.D. Ohio) (complaint filed Oct. 4, 2012; adjudication in favor of Defendants and case dismissed Sept. 16, 2014).

This is an action under the Fair Housing Act in which Plaintiffs, a person with disabilities and her son who is claimed as her live-in caretaker, allege that Defendant, the landlord of Plaintiffs’ Section 8 apartment in West Bay Apartments in Columbus, improperly sought to evict them based on the caretaker’s residency

in the apartment. Plaintiff Painter-Payne specifically alleges that Defendant denied her request for reasonable accommodation to allow her son to reside with her as her live-in aide in violation of the FHA. Defendant disputed that Plaintiff's request that her son be her live-in aide was reasonable and necessary, and provided evidence that Plaintiff's son did not meet the criteria for an approved live-in aide because of his criminal background and because of recent actions deemed an immediate threat to the safety of the community. While the case was pending, the parties agreed to terms of Plaintiffs vacating the apartment. In its order on the parties' various motions for summary judgment, the court granted Vesta West Bay summary judgment because it found Plaintiffs failed to provide evidence that the son was the only live-in aide available to Painter-Payne, and thus could not show that but for the requested accommodation, Painter-Payne would likely be denied an equal opportunity to enjoy the housing of her choice. The court directed judgment in favor of Defendant and the case was dismissed on September 16, 2014.

PAST FAIR HOUSING GOALS AND RELATED ACTIVITIES

Columbus and Franklin County's 2012 Analysis of Impediments identified a total of 32 impediments to fair housing choice and grouped them according to subject area. The following section of this report contains a description of activities undertaken by Columbus, Franklin County, or other community partners toward addressing the 2012 impediments within each of the general subject areas. The City and County contract with the Columbus Urban League to provide many of the services and solutions recommended by the 2012 AI.

Impediment Area 1: General

The City and County both continue to provide funding to the Columbus Urban League (CUL) for the provision of contractual services, including complaint investigation, counseling and supportive services, and education. Additionally, the CUL performs monitoring of affirmative marketing plans and practices for local housing providers. Additionally, the County continues to make homebuyer education a required part of the home buying process for county-funded down payment assistance programs.

Impediment Area 2: NIMBY

Columbus and Franklin County have worked with housing vendors to educate the public about the need for public and special needs housing with regard to the benefits they provide communities. Franklin County has also incentivized CDBG and HOME scoring processes to encourage jurisdictions to develop and implement fair housing strategies.

Impediment Area 3: Development Regulations and Zoning Requirements

Both the City and County have incentivized the development of affordable housing in suburban jurisdictions and the City of Columbus is providing guidance and best practices for area commissions to help guide their decisions.

Impediment Area 4: Compliance with FHA, ADA, and AWARE standards

Franklin County has adopted AWARE standards related to housing development and construction (benefitting seniors, the disabled and energy efficiency.)

Impediment Area 5: Tax Policies

The Affordable Housing Alliance released a report to the community documenting the need for affordable housing and offering proposals including changes to tax policies to pay for the endeavor. The City and County continue to look at ways that TIFs and other tax incentives can support affordable housing and infrastructure improvements and the County land bank is exploring the creation of a local land trust. Further, the County made its recent sales tax increase permanent, committing a portion of that increase to affordable housing projects and initiatives.

Impediment Area 6: Public Housing and Section 8 Units

CMHA and housing developers have utilized Good Neighbor and Cooperation Agreements to document accountability and as education tools.

Impediment Area 7: Need for Low-Income Housing

The Affordable Housing Trust for Columbus and Franklin County serves as a catalyst for the production of affordable housing and encourages homeownership in order to stimulate development of affordable housing in and near employment centers. The organization invests in affordable residential development in older and disinvested areas of Columbus and Franklin County.

Impediment Area 8: Source of Income Discrimination in Section 8

The City and County continue to be aware of the benefits of greater and wider usability of Section 8 vouchers, however, they have not yet undertaken any specific plans beyond what the Columbus Metropolitan Housing Authority already does to promote voucher acceptance.

Impediment Area 9: Lending

CUL conducts monthly HUD-approved, eight-hour homebuyer education and counseling programs, provides counseling and guidance to future homebuyers, distributes information on affordable homebuyer programs, including down payment assistance programs, and provides education and awareness to potential homeowners and housing providers.

Impediment Area 10: Rental Housing

The CUL provides educational information and materials to landlords and tenants, referrals (i.e., for financial, legal, and other services), and provides intervention, mediation, and supportive services for conflict resolution between landlords and tenants.

Impediment Area 11: GLBT Discrimination in Housing

Franklin County has increased its funding levels to the Columbus Urban League to take on more housing discrimination cases and to expand its education of the public concerning housing discrimination especially related to protected classes such as GLBT, disability, and familial status.

CHAPTER 10.

IDENTIFICATION OF IMPEDIMENTS

Described below are the fair housing issues identified in this Analysis of Impediments, along with their associated contributing factors. Priority contributing factors are those that are most likely to limit or deny fair housing choice or access to opportunity; non-priority contributing factors are likely to also have a causal relationship to the fair housing issue but are less directly or immediately able to remedy the named issue. Recommendations to address priority contributing factors are provided in Table 20, along with associated activities, goals, timelines, and responsible parties.

Impediment #1: Affordable Housing Options Lack Access to Opportunity Features

Areas of the Columbus region with the best schools, the lowest rates of poverty, the highest rates of workforce involvement, and the best environmental quality tend to be neighborhoods outside Columbus in Franklin County's suburbs. In these opportunity-rich areas, housing costs can be prohibitive for low- and moderate-income households. Housing Choice Vouchers, which could subsidize the higher rents in these communities, have long waiting lists and landlords there often will not accept vouchers in the first place.

Additional multifamily rental properties in these areas with enhanced access to opportunity, particularly subsidized units that will remain affordable over a long term, would open up new housing options for families that choose to move in order to take advantage of the school, employment, or recreational opportunities that may exist for them there. Columbus's more urban neighborhoods may offer opportunities of other sorts, such as transit availability, walkability, and proximity to jobs and retail establishments. Affordable housing in these areas is another important goal. A third type of residential setting, the so-called win-win areas, blend some of the typical urban neighborhood amenities such as proximity to jobs with access to higher-performing suburban school districts and should also be considered for new affordable housing options.

Based on demographic data presented in this report, low- and moderate-income families are more likely to be families of color, to have one or more members with a disability, or to have characteristics of other federally protected classes. In order to have equal access to the opportunity features in their community, these populations will require a sustained local commitment to expanding the affordable housing stock in areas with high levels of opportunity.

Impediment #2: Neighborhoods with Low Access to Opportunity

While several Columbus neighborhoods have seen revitalization including housing renovation, infill development, and new businesses, others lack sufficient access to vital community resources such as quality schools, shopping opportunities, a safe environment, adequate public infrastructure, and other opportunity dimensions. Opportunity indices and maps developed by HUD indicate that Black, Latino, and Native American residents in Columbus have some of the lowest levels of access to proficient schools, labor market engagement, and low poverty areas in the region. On average, their levels of access are

lower than those of white Columbus residents, and residents of Franklin County outside of Columbus. Comments received from stakeholders provide information about additional opportunity dimensions. Several people who provided input for this study noted the loss of the Kroger in Columbus' Linden neighborhood as reducing grocery access for the community. New Americans, including refugees who participated in a focus group, note safety concerns in their neighborhoods, both in terms of crime and in terms of housing conditions. While encouraging affordable housing options in high opportunity areas, as described in Impediment #1, is an important fair housing goal, addressing resource gaps and fostering opportunity-in-place is also crucial. Many residents desire to stay within their communities where they have access to affordable housing, transit, job centers, and social networks. Thus, a key aspect of fair housing is ensuring that these communities also have access to quality schools, shopping, and safety.

Consolidated Plans should identify place-based strategies for improving physical resources and building human capital in low opportunity and high poverty areas. Strategies should address things such as improving property conditions; ensuring adequate public infrastructure, including water access; providing adult education and employment opportunities; improving access to shopping and employment through enhanced transit, pedestrian, and bicycle facilities; offering supplemental youth education programs; and addressing barriers to retail development.

Impediment #3: Households of Color Have Reduced Access to Homeownership

Many households desire homeownership as a housing option in order to build equity and increase stability. However, homeownership rates and data regarding home mortgage applications indicate that purchasing a home is significantly more difficult for households of color than it is for white households. In Columbus, 54% of white households own their homes, compared to 34% of African Americans, 39% of Asians, and 24% of Latinos. In Franklin County outside of Columbus, homeownership rates are higher, but still show disparity by race and ethnicity. About 77% of white households in Franklin County own their homes, compared to only 41% of Black households and 44% of Latinos. While not the only factor impacting homeownership rates, differences in home mortgage approval rates play a considerable role. Home Mortgage Disclosure Act data shows that Black applicants for a conventional mortgage are more than twice as likely to be denied as white applicants, a difference that exists at all income levels. Latino applicants are also more likely to be denied a mortgage loan, regardless of income. While households of color were more likely to apply for a government-backed home mortgage loan, they continued to face higher denial rates and thus reduced access in comparison to white households.

To address disparities in access to homeownership, the City and County plan to continue funding homebuyer and financial counseling, as well as funding foreclosure prevention assistance for low- and moderate-income households at risk of losing their homes. The City and County should also consider exploring the need for a responsible banking program that encourages local lenders to further fair housing as it relates to homeownership.

Impediment #4: Protected Classes Face Greater Housing Instability

Input and local data gathered for this study indicate that households of color, immigrants, and refugees often face considerably more housing instability due to evictions, homelessness, and foreclosure than do white residents. According to Princeton University's Eviction Lab, the first nationwide database of evictions, there were 18,373 eviction filings and 11,139 evictions in Franklin County in 2016. Of these,

the vast majority (81%) were in Columbus. For every 100 rental units in Columbus, there were 4.6 evictions in 2016, which was 2.1 more than the national average. Several stakeholders noted that Ohio's short timeline for evictions often puts renters at risk of being made to leave their homes with relatively little notice, and that race and familial status are two of the strongest indicators of eviction. Refugee and immigrant focus group participants, along with stakeholders that work regularly with these populations, noted that they are also disproportionately impacted by evictions. For households without anywhere else to go, an eviction can lead to homelessness; for all households, it makes it more difficult to obtain housing in the future. Additionally, fear of retaliatory eviction, particularly among the area's most vulnerable renters, may make them hesitant to address maintenance/repair needs and other housing conditions that endanger health and safety with their landlords.

Franklin County's Department of Job and Family Services provides one-time Emergency Assistance of up to \$1,500 to assist low-income family households avoid eviction. The City of Columbus has held eviction prevention workshops in partnership with the Legal Aid Society of Columbus and Columbus Next Generation to provide information to landlords and tenants who are facing or at risk of facing an eviction. Additionally, in partnership with the City of Columbus, Franklin County, and several other local organizations, the Prevent Family Homelessness Collaborative has launched a pilot project to prevent evictions through partnership with local apartment owners and managers. The project aims to connect at-risk families with social, health, and government services to prevent eviction, meanwhile reducing costs associated with eviction for participating apartment owners. The City of Columbus and Franklin County should monitor the results of this program as the pilot continues to determine its efficacy at preventing evictions and possible implications for future eviction-prevention efforts. The City and County should also review ways in which HUD grant funds may be used to prevent or lessen the effects of evictions.

In addition to evictions, homelessness is also more likely to impact protected classes. According to the Community Shelter Board's 2018 report *A Place to Call Home*, Black individuals are disproportionately represented in the homeless population at 65%, compared to their 27% population share in Columbus. LGBTQ youth are also disproportionately likely to be homeless. Both the City of Columbus and Franklin County currently address homelessness using Emergency Solutions Grant (ESG) and other HUD grant funds. To City and County will review the performance of homelessness and homelessness prevention programs to ensure funds are targeted to populations most in need. Additionally, the City and County will work to expand the availability of transitional housing with case management services, permanent supportive housing, and permanent affordable housing.

Impediment #5: Continued Need for Fair Housing Outreach, Education, and Enforcement

A broad need for ongoing outreach, education, and enforcement regarding fair housing is evident from public input, local litigation history, and the results of the fair housing survey. Meeting and interview participants names a variety of local organizations that they believed could provide fair housing assistance including the Columbus Urban League, the Ohio Civil Rights Commission, Legal Aid, and the Columbus Metropolitan Housing Authority, yet fewer than half (47.6%) of survey respondents reported knowing where to file a complaint of housing discrimination. Input from meeting attendees and focus group participants also suggests that immigrants, refugees, and people with limited English proficiency are at particular risk of having their housing rights violated and that disseminating education to these populations is difficult. Finally, documented cases of "not in my backyard" (NIMBY) attitudes leading to

the successful demise of planned affordable housing developments were related, including a 2012 lawsuit against Dominion Homes. Each of these adds to the evidence that continued fair housing programming, both on the education and the enforcement sides, is needed.

Impediment #6: Inadequate Compliance with Housing Accessibility Requirements

Stakeholder input has suggested that housing units specifically constructed to be accessible to people with disabilities are in very short supply; where they exist there are often waiting lists a year or more long and there is little unit turnover. Furthermore, modifications to a non-accessible home or rental unit can be prohibitively expensive, although some programs do exist to assist with these types of improvements. On top of these constraints on the existing supply of accessible units, the management of units can further limit availability for the disabled population. The most frequent basis of filed housing discrimination complaints is disability status and the number of lawsuits filed regarding accommodations for people with disabilities is significant. More than half of the respondents (54.1%) to the fair housing survey felt that the lack of housing options for people with disabilities constituted a barrier to fair housing in the region. Education and regulatory protections for the housing needs of this vulnerable population should be addressed.

Impediment #7: Zoning Code Provisions Limit Housing Choice

Several elements within Columbus and Franklin County's respective zoning codes could be amended or clarified to expand housing choice, including for people with disabilities. In Franklin County, accessory dwelling units (e.g. garage apartments, carriage houses, or granny flats) are limited only to certain residential zoning districts, and even then, are permitted to be occupied only by family members of the primary dwelling's owner. Accessory dwelling units provide an opportunity to integrate small and affordable rental units into traditional single-family neighborhoods, but Franklin County's zoning code limits this potential.

Neither the City nor County's code currently contains a reasonable accommodation process whereby a person who is disabled may seek an administrative approval of a home modification rather than submit it through the more cumbersome variance process. Not only does an administrative process save time and cost, it also does not subject the applicant to a public hearing, which can unnecessarily lead to opposition from neighbors. Both jurisdictions' zoning codes apply some form of a "related by blood or marriage" standard to determining whether a household may be considered a family. The definitions could be rewritten to relax this standard, which could potentially make it easier for live-in aids and caregivers to support residents with disabilities. In some cases, the codes both appear to relegate housing for people recovering from alcohol or substance abuse addictions to non-residential areas, which would deny these residents a reasonable range of housing choices.

Finally, whereas the City and County zoning codes were reviewed in detail as part of this analysis, a comparable review should be undertaken of the suburban municipalities' codes. Several stakeholders mentioned the likelihood that zoning restrictions, among other factors, could potentially limit the affordability of housing in the suburbs. Given this possibility and the propensity of zoning codes in general to raise fair housing concerns, this should be a subject for future study.

TABLE 20 – FAIR HOUSING GOALS AND ACTIVITIES

Contributing Factors	Recommended Activities	Responsible Parties and Partners
Impediment #1: Affordable Housing Options Lack Access to Opportunity Features		
Affordable housing options are limited in neighborhoods that offer enhanced access to opportunity	<ul style="list-style-type: none"> • The City and County should review how they award funding for housing projects to ensure that they are properly incentivizing affordable housing development in areas of high opportunity. • The City can consider property tax abatements for low-income households living in revitalizing neighborhoods where home values are increasing to prevent displacement (Q3, 2021). 	City of Columbus Franklin County
Areas with affordable housing experience concentrated poverty and low opportunity	<ul style="list-style-type: none"> • The City and County should jointly explore the creation of an evaluation tool that could be used to review publicly-funded housing development decisions to maximize equitable outcomes (e.g. the King County Housing Development Consortium’s Racial Equity Impact Tool). <ul style="list-style-type: none"> a. Explore framework for evaluation tool and consider practices from other jurisdictions. (Q3, 2019) b. Develop and implement evaluation tool for new affordable housing construction. (Q1, 2020) • New affordable housing located in an area that increases access to opportunity should be given priority consideration for funding with CDBG, HOME, or other funds. (Ongoing, beginning Q1, 2019) • As the City and County comprehensive plans are routinely updated, the City and County should review proposed housing element updates for concerns related to equity of planning policies or development plans. (Ongoing, beginning Q1, 2019) 	City of Columbus Franklin County

Contributing Factors	Recommended Activities	Responsible Parties and Partners
Impediment #2: Neighborhoods with Low Access to Opportunity		
Need for neighborhood revitalization and safety improvements in areas of low opportunity	<ul style="list-style-type: none"> • During the Consolidated Planning process, the City and County should identify place-based strategies focused on improving physical resources and building human capital in specific, defined high-poverty areas. <ul style="list-style-type: none"> a. Continue to fund projects which address unsafe property conditions, nuisance properties, streetlights, sidewalks, infrastructure, and public facilities. (Ongoing, beginning Q1, 2019) b. Develop a project selection tool to prioritize projects by feasibility and impact to ensure that funding is spent on high impact projects in a timely manner. (Q2, 2019) c. Address adult education needs in areas such as employment readiness, GED classes, or job training programs designed to serve residents living in high-poverty areas. (Q1, 2020) • Develop and keep up-to-date an inventory of areas in Columbus and Franklin County where public infrastructure is lacking, limited, or otherwise in jeopardy. Through collaboration between the City, County, and impacted townships, outlined a strategy for addressing infrastructure needs in areas of low opportunity. (Q1, 2020) 	City of Columbus Franklin County
Areas of the city are underserved relative to access to grocery and other neighborhood-oriented retail	<ul style="list-style-type: none"> • Evaluate access to grocery stores and other neighborhood-oriented retail to identify areas with low access to neighborhood-level amenities as part of the Consolidated Planning process. (Q1, 2019) • The City should consider a study to identify barriers to retail in neighborhoods with significantly lower access to amenities. (Q1, 2020) • During the Consolidated Planning process, the City should create a place-based strategy to provide business and entrepreneurial support, including financial and technical assistance, to eligible new or expanding businesses that fill market niches and create jobs for low-income residents. (Ongoing, beginning Q1, 2019) 	City of Columbus
Low school proficiency disproportionately impacts African American and Latino residents in Columbus	<ul style="list-style-type: none"> • Fund supplemental youth education programs for low to moderate income children that address academic proficiency. (Ongoing, beginning Q1, 2019) • Explore options for collaboration with local school districts to connect families and local community resource agencies, including tutoring services, housing providers, and adult education with the goal of removing students' barriers to learning and encouraging stability. (Q1, 2020). 	City of Columbus Franklin County

Contributing Factors	Recommended Activities	Responsible Parties and Partners
Impediment #2: Neighborhoods with Low Access to Opportunity (continued)		
<p>There is a continued need for transit and pedestrian improvements to expand low and moderate income residents' access to jobs, shopping, and other opportunities and resources</p>	<ul style="list-style-type: none"> • Improve pedestrian and bike facilities to better connect residential areas with various community resources and opportunities. <ul style="list-style-type: none"> a. Analyze sidewalk networks, pedestrian safety, ADA accessibility, and bike lanes/paths in low and moderate income neighborhoods to determine potential need for enhanced pedestrian and bike facilities to connect residential areas with shopping, healthcare, bus stops, employment areas, and other destinations. Also consider the availability of pedestrian infrastructure connecting key destinations (major employers or employment centers, shopping areas, etc.) with the closest bus stop. Develop priorities for improvements. (Q1, 2020) b. Based on this analysis, make recommended sidewalk and bike lane/path improvements, beginning with the highest priorities. (Ongoing, beginning, Q3 2020) • Continue looking for opportunities to improve transit access between Columbus neighborhoods, suburban population centers, and major employers/employment centers, as part of the Consolidated Planning process for 2020-2024. (Ongoing, beginning Q1, 2019) 	<p>City of Columbus Franklin County</p>
Impediment #3: Households of Color Have Reduced Access to Homeownership		
<p>Lower shares of African American and Latino households apply for home mortgage loans than white households</p>	<ul style="list-style-type: none"> • Continue to fund an agency that provides homebuyer and/or financial counseling. Through this or another agency, fund foreclosure prevention assistance for low- and moderate-income homeowners at risk of losing their homes. Review Affirmative Marketing strategies to ensure these programs are marketed to communities of color. (Ongoing, beginning Q1, 2019) • Review down payment assistance programs to ensure that program parameters are meeting the needs of low- and moderate-income households as the housing market continues to evolve and average home prices continue to rise. (Ongoing, beginning Q2, 2019) 	<p>City of Columbus Franklin County</p>

Contributing Factors	Recommended Activities	Responsible Parties and Partners
Impediment #3: Households of Color Have Reduced Access to Homeownership (continued)		
<p>African American and Latino applicants have higher denial rates for mortgage loans than white applicants</p> <p>Home mortgage loan origination rates are considerably lower in census tracts where people of color make up larger population shares</p>	<ul style="list-style-type: none"> • Fund fair housing and fair lending education and outreach efforts to mortgage lenders operating in the city of Columbus and Franklin County. (Annually, beginning Q1, 2019; See Impediment #5) • Conduct region-wide testing in the area of mortgage lending (Q1, 2019; See Impediment #5) • Evaluate need for and approaches to a responsible banking program in Columbus and Franklin County. <ul style="list-style-type: none"> a. Working with a research organization, conduct an analysis of Home Mortgage Disclosure Act Data by lending institution to assess access to mortgage lending for households of color. (Q1, 2020) b. Based on this study, evaluate options for a responsible banking program in Columbus and Franklin County. Consider using distribution of government financial relationships (within banking regulations) to incentivize fair lending by financial institutions by passing a Responsible Banking Ordinance. See Cleveland and other responsible banking ordinances as examples. (Q1, 2021) c. Hold lenders and other stakeholders to the City and County’s goals for furthering fair housing as it relates to homeownership as a prerequisite for participation in down payment assistance and other homeownership development programs. Work with stakeholders to develop and implement a responsible banking program or ordinances. (Q1, 2021) 	<p>City of Columbus Franklin County</p>
Impediment #4: Protected Class Face Greater Housing Instability		
<p>Evictions disproportionately impact households of color and New Americans</p>	<ul style="list-style-type: none"> • Monitor results of the Prevent Family Homelessness Collaborative’s pilot program designed to connect renters facing eviction with emergency financial and/or case management support through collaboration with apartment community management. (Q2, 2019) • Review ways in which funding can be used to prevent eviction and reduce the effects of eviction through the 2020-2024 Consolidated Planning process. 	<p>City of Columbus Franklin County</p>

Contributing Factors	Recommended Activities	Responsible Parties and Partners
Impediment #4: Protected Class Face Greater Housing Instability (continued)		
Black individuals and LGBTQ youth are disproportionately impacted by homelessness	<ul style="list-style-type: none"> • Review performance of programs providing tenant-based rental assistance, homelessness prevention, emergency housing assistance, and/or rapid re-housing to ensure funds are targeted to the populations most in need. (Ongoing, beginning Q1, 2019) • Provide funding to support transitional housing with case management services and permanent supportive housing. (Ongoing, beginning Q1, 2019) • Work to expand the availability of permanent affordable housing, as described in Impediment #1. (See timelines in Impediment #1) 	City of Columbus Franklin County
Impediment #5: Continued Need for Fair Housing Outreach, Education, and Enforcement		
Delivery of fair housing services is inconsistent and can be better coordinated	<ul style="list-style-type: none"> • Review current fair housing services for opportunities to clarify or reprioritize the scope of work and enhance accountability measures. (Annually, beginning Q1, 2019) • Research additional fair housing and fair lending services or activities to fill in the gaps identified in this plan (Q1, 2019) • Consider formation of a local fair housing advisory council to meet periodically to review local performance and identify needs. (Q3, 2019) 	City of Columbus Franklin County
Immigrants, refugees, and people with limited English proficiency are at heightened risk of housing discrimination	<ul style="list-style-type: none"> • Provide fair housing enforcement and education in culturally-appropriate ways, particularly to non-English speaking communities. <ul style="list-style-type: none"> a. Review current contracts with providers of fair housing services for opportunities to clarify or reprioritize the scope of work and enhance accountability measures. (Annually, beginning Q1, 2019) b. If needed, issue an RFP to local organizations for funding supporting fair housing education in culturally-appropriate ways, particularly to non-English speaking communities. (Annually, beginning Q1, 2020) • Fair housing education for lenders and landlords should be developed and delivered. <ul style="list-style-type: none"> a. Review current contracts with providers of fair housing services for opportunities to clarify or reprioritize the scope of work and enhance accountability measures. (Annually, beginning Q1, 2019) b. If needed, issue an RFP to local organizations for funding supporting education for lenders and landlords. (Annually, beginning Q1, 2020) • Conduct region-wide fair housing testing specifically in the area of lending. <ul style="list-style-type: none"> a. Issue an RFP to local organizations for funding supporting testing of the local lending market. (Q1, 2020) 	City of Columbus Franklin County

Contributing Factors	Recommended Activities	Responsible Parties and Partners
Impediment #5: Continued Need for Fair Housing Outreach, Education, and Enforcement (continued)		
<p>NIMBYism threatens otherwise viable housing opportunities for protected classes</p>	<ul style="list-style-type: none"> • Develop and deliver community education around the concept of affordable housing and its cultural and economic value to the community. <ul style="list-style-type: none"> a. Develop an adaptable slide deck and presentation on the subject of the value of affordable housing, including qualitative and quantitative arguments. (Q4, 2019) b. Establish a small “speakers bureau” of designated City/County staff or other community partners to deliver the presentation to local groups. (Q1, 2020) c. Market the presentation and available speakers to community group such as neighborhood/homeowners’ associations, Rotary and other similar clubs, and associations of Realtors, homebuilders, and lenders. (Ongoing, beginning Q2, 2020) 	<p>Franklin County</p>
Impediment #6: Inadequate Compliance with Housing Accessibility Requirements		
<p>Litigation history and complaint filings suggest housing providers need greater education and accountability around the design, construction, rental, and modification of dwellings for people with disabilities</p>	<ul style="list-style-type: none"> • Provide fair housing enforcement and education related to the rights of people with disabilities. <ul style="list-style-type: none"> a. Issue an RFP to local organizations for funding supporting the enforcement (i.e. testing, complaint filing, mediation, litigation) and education for housing industry professionals (architects, builders, developers, landlords, property managers) regarding the housing rights of people with disabilities. (Annually, beginning Q1, 2020) b. Review how the city and county allocate funding to ensure that they are incentivizing ADA assessable housing. (Q2, 2019) 	<p>City of Columbus Franklin County</p>

Contributing Factors	Recommended Activities	Responsible Parties and Partners
Impediment #7: Zoning Code Provisions Limit Housing Choice		
<p>Restrictive zoning code provisions increase development costs and impede affordable housing development</p>	<ul style="list-style-type: none"> • Consider relaxing Franklin County’s regulation of accessory dwelling units to permit them in additional zoning districts and make them available to non-family members. <ul style="list-style-type: none"> a. Review the zoning codes with planning staff members and consult with community partners as needed to draft potential revisions. (Q3, 2019) b. Amend ordinances and policies as necessary to expand housing choice for people with disabilities. (Q1, 2020) • Analyze zoning codes of suburban municipalities not covered by this AI for potential fair housing issues. <ul style="list-style-type: none"> a. Working with a partner organization (such as a university or law school, a nonprofit research institute, or a fair housing organization), review the zoning codes of each individual municipality within Franklin County for potential impediments to fair housing choice. (Q4, 2020) b. Convene elected officials, planning commission members, planners, and other policymakers from the suburban municipalities to discuss together the results of the review, the municipalities’ willingness to consider code amendments, and outline an action plan. (Q2, 2021) 	<p>Franklin County</p>

Contributing Factors	Recommended Activities	Responsible Parties and Partners
Impediment #7: Zoning Code Provisions Limit Housing Choice (continued)		
<p>Ambiguous or inconsistent zoning code provisions raise questions about allowable siting and occupancy for housing for people with disabilities</p>	<ul style="list-style-type: none"> • Family definitions should be reviewed to consider the elimination of relationship by “blood or marriage” as a basis determining whether a household qualifies as a family. <ul style="list-style-type: none"> a. Review the City and County zoning codes with planning staff members and consult with community partners as needed to draft potential revisions. (Q3, 2021) b. Amend ordinances and policies as necessary to expand housing choice for people with disabilities. (Q1, 2022) • Family definitions should be aligned with group housing definitions and Franklin County’s code should clarify where these group housing uses are permitted. <ul style="list-style-type: none"> a. Review the City and County zoning codes with planning staff members and consult with community partners as needed to draft potential revisions. (Q3, 2021) b. Amend ordinances and policies as necessary to expand housing choice for people with disabilities. (Q1, 2022) • Review and clarify the permitted locations of housing serving people recovering from alcohol or substance abuse addition to include residential districts. <ul style="list-style-type: none"> a. Review the City and County zoning codes with planning staff members and consult with community partners as needed to draft potential revisions. (Q3, 2021) b. Amend ordinances and policies as necessary to expand housing choice for people with disabilities. (Q1, 2022) 	<p>City of Columbus Franklin County</p>
<p>Columbus and Franklin County do not have a clear and objective process by which persons with disabilities may request a reasonable accommodation</p>	<ul style="list-style-type: none"> • Consider, draft, and adopt local code amendments that would provide an administrative alternative to a variance application for people requesting accommodation or modification related to a disability. <ul style="list-style-type: none"> a. Review the City and County zoning codes with planning staff members and consult with community partners as needed to draft potential revisions. (Q3, 2021) b. Amend ordinances and policies as necessary to expand housing choice for people with disabilities. (Q1, 2022) 	<p>City of Columbus Franklin County</p>