



EQUAL HOUSING
OPPORTUNITY

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING

City of Springfield 2013

TABLE OF CONTENTS

	Page
List of Tables	3
List of Maps and Figures	4
List of Appendices	4
I Introduction and Executive Summary	5
II Demographic Information on the Protected Classes	9
III Racial Segregation	18
IV Housing Market	22
V Public Housing	27
VI Real Estate Community	29
VII Lender Analysis	32
VIII Focus Groups	40
X Fair Housing Testing	42
XI Fair Housing Complaints	43
XI Public Policies	43
XII City of Springfield Fair Housing Actions	48
XIII Impediments to Fair Housing	48

LIST OF TABLES

NAME OF TABLE	PAGE
TABLE 1: TOTAL POPULATION, CLARK COUNTY	9
TABLE 2: DECLINE IN POPULATION	9
TABLE 3: GENDER CHARACTERISTICS	10
TABLE 4: RACE CHARACTERISTICS	10
TABLE 5: NEW RACE STATISTICS	11
TABLE 6: FAMILIAL STATUS: CHILDREN UNDER THE AGE OF 5 AND 18	12
TABLE 7: CITY OF SPRINGFIELD DISABILITY STATISTICS	13
TABLE 8: VETERAN STATUS	15
TABLE 9: PERCENT MINORITY IN CLARK COUNTY, CITY OF SPRINGFIELD AND CLARK COUNTY OUTSIDE OF SPRINGFIELD	22
TABLE 10: COST BURDEN FOR ALL HOUSEHOLDS, 2000	23
TABLE 11: HOUSEHOLDS WITH HOUSING PROBLEMS BY RACE, 2000	24
TABLE 12: DISPROPORTIONATELY GREATER NEED BY RACE, 2000	25
TABLE 13: IMPEDIMENTS TO FAIR HOUSING RATINGS BY REALTORS	30
TABLE 14: 2012 SUMMARY OF DEPOSITS FOR SPRINGFIELD MSA	33
TABLE 15: CRA RATINGS CHART FOR SPRINGFIELD MSA BANKS 2012	33
TABLE 16: LOAN APPLICATIONS, ORIGINATIONS AND DENIALS BY RATE	34
TABLE 17: CLARK COUNTY NEW FORECLOSURE FILINGS AND DEFAULT JUDGMENTS: 1997-2010	36
TABLE 18: ESTIMATED NUMBER OF HOUSING UNITS THAT POTENTIALLY CONTAIN LEAD-BASED PAINT	46
TABLE 19: ESTIMATED NUMBER OF HOUSING UNITS THAT POTENTIALLY CONTAIN LEAD-BASED PAINT BY INCOME CATEGORY	46
TABLE 20: 2007 LEAD-BASED PAINT HAZARD TESTING RESULTS	47

LIST OF MAPS

NAME	PAGE
MAP 1: RENTAL PERCENTAGE BY CENSUS TRACT	14
MAP 2: CONCENTRATION OF VETERANS BY CENSUS TRACT	17
MAP 3: CONCENTRATION OF BLACKS BY CENSUS TRACT	18
MAP 4: CONCENTRATION OF HISPANICS BY CENSUS TRACT	19
MAP 5: PER CAPITA INCOME BY CENSUS TRACT	20
MAP 6: HOME VALUE CHANGE BY INDEX BY ZIP CODE, 2005-2011	26
MAP 7: FORECLOSURE INDEX BY ZIP CODE, JUNE 2012	37
MAP 8: SPRINGFIELD ZIP CODES	37
MAP 9: REO PROPERTIES INDEX BY ZIP CODE, JUNE 2012	38
MAP 10: 90 DAYS OF MORE DELINQUENCY BY ZIP CODE, JUNE 2012	39

LIST OF FIGURES

NAME	PAGE
FIGURE 1: INCOME AND RENTAL OCCUPANCY REGRESSED ON FAMILIES WITH CHILDREN UNDER 18	13
FIGURE 2: INCOME AND RENTAL OCCUPANCY REGRESSED ON CT PERCENT BLACK	21
FIGURE 3: SEGREGATION IN SPRINGFIELD AND CLARK COUNTY	21
FIGURE 4: SPRINGFIELD MSA LOANS, 2006-2010	35

LIST OF APPENDICES

1.	"FAIR HOUSING PAPER" BY DEVON LENZ. WITTENBERG UNIVERSITY, 2012
2.	SPRINGFIELD 3-5 YEAR STRATEGIC PLAN
3.	SPRINGFIELD METROPOLITAN HOUSING AUTHORITY REPORT AND PAPERS SUBMITTED
4.	SPRINGFIELD BOARD OF REALTORS EXECUTIVE BOARD AND BROKERS INFORMATION
5.	SPRINGFIELD REALTORS SELF-REPORT SURVEY TALLY
6.	SPRINGFIELD FAIR HOUSING COMPLAINTS FILED WITH HUD 2008-2012
7.	FOCUS GROUP STUDY: 2012 IMPEDIMENTS TO FAIR HOUSING ANALYSIS
8.	MIAMI VALLEY FAIR HOUSING TESTING SUMMARY TABLE (2008-2011)
9.	CITY OF SPRINGFIELD FAIR HOUSING ORDINANCE
10.	CITY OF SPRINGFIELD AFFORDABLE HOUSING POLICY
11.	CITY OF SPRINGFIELD AFFIRMATIVE MARKETING PLAN
12.	CITY OF SPRINGFIELD HOUSING MARKET ANALYSIS, 2001
13.	CITY OF SPRINGFIELD FAIR HOUSING GENERAL PERFORMANCE REPORTS (2008-2012)

I. Introduction and Executive Summary

A. Introduction

The City of Springfield has conducted this Fair Housing Analysis and Plan to comply with federal regulations as part of our City's consolidated planning process.

The City of Springfield has been affirmatively furthering fair housing for many years and has made it a priority in its programs. Within the City of Springfield, there has been a staff person working on fair housing issues for over 20 years. Since 1991, a staff person has been assigned to coordinate fair housing with 60% of their time devoted to this endeavor. In 1996, the City of Springfield conducted its first Analysis of Impediments to Fair Housing. The most recent analysis was completed in 2008. It has been implementing actions to address those impediments for the past five years. At this time, the City welcomes this opportunity to analyze the progress that has been made in fair housing, identify any continuing barriers and develop a plan to affirmatively further fair housing in the future, overcoming existing barriers.

As this report will show, there have been significant strides in fair housing in Springfield. This is evidenced by actions and awareness in the real estate and lending community, the decline in racial segregation and to some extent by the small number of fair housing complaints received. Yet there are still clearly some barriers remaining to fair housing which this report will address.

The material reported in our Fair Housing Analysis covers a time period from 2008-2012 and involves a variety of measures, including statistical analysis of HMDA data, a self-report survey of local real estate persons, analysis of census data, and information from housing providers in the community. Devon Lenz, geography student at Wittenberg University provided statistical analysis of housing data. Information on housing from the Consolidated Plan was included. In addition, the City contracted with Harper Mack and Associates to conduct ten focus groups for public input.

This analysis was conducted with City of Springfield CDBG funding. Nancy Flinchbaugh, Springfield Fair Housing Coordinator, compiled and assembled the report from information available. Arlan Tolliver, Springfield Metropolitan Housing Authority Director, and his staff provided information. The Miami Valley Fair Housing Center conducted fair housing testing for the analysis. The U.S. Department of Housing and Urban Development provided information about housing complaints received. The City of Springfield Human Relations Board provided oversight for the analysis.

B. Executive Summary

This Fair Housing Analysis analyzes the fair housing data for the City of Springfield (2008-2012) in order to identify barriers to fair housing and develop a plan to overcome these barriers.

Demographic Summary of the protected classes

In 2010, there were 32,743 females (52.4%) and 28,865 males (47.6%). Racially, the majority of persons in Springfield are White (45,607 or 75%), with the Black population being the second largest racial group (10,981 or 18%). This represents a 5% decline in White population and a 1% decline in Black population from 2000. The Hispanic population has increased up from 1.5% to 3% with 1824 total residents in 2010. 20% of the persons over the age of 65 have difficulty living independently and 30% have ambulatory problems. 11% of younger adult population (ages 18-64) have cognitive or ambulatory difficulties. 24.4% of the population is under the age of 18, which is up by six percent from 2000, although the population under the age of 5 has decreased.

In the City of Springfield, the majority of people own their own home, (57.3% are owner-occupied units, up .1% since 2000). Minorities and families with children are concentrated in some areas of Springfield where the concentration of rental housing is even higher than the City average. Substandard housing is also more common in these older neighborhoods have have a higher concentration of rental units. Families with children are more likely to be low income and living in rental housing, than families without children.

Since our last analysis, Veteran Status was added to Ohio's fair housing law. There are 5,434 veterans in Springfield. As a group, they have higher income than the non-veterans and tend to live in the higher income areas, but they also have a higher unemployment rate than the rest of the population.

Racial Segregation

Racial segregation has been a problem in the City of Springfield and Clark County since their beginnings. However our research indicates that the City is very gradually becoming more integrated. In our last analysis we reported that Black population density maps showed that the Black population became more dispersed throughout the City between 1990 and 2000. Statistical analysis conducted by Geographer Devon Lenz in this report shows this trend continuing, although there are still several areas of high density minority concentration which are in the southwest quadrant and lower income areas of the city. However, the poorest neighborhoods in the City have a White majority in the university area and also Selma Road.

The reality of racial segregation continues to be a fair housing concern in the City of Springfield. While the trend toward integration is apparent, the movement is slow. When one considers the larger region of Clark County, where the dissimilarity index also shows progress, there is an even greater segregation. The Black population of Clark County outside the City limits of Springfield is only 1.5% (See Table 9). This indicates a need for continual vigilance, education and enforcement to continue the progress of opening the doors of equal housing opportunity to all members of our community.

Housing Market Analysis

There is a concern that minority households have more of a cost burden, more rental housing and more problems with housing. A high percent of all renters are experiencing

problems with their housing and there continues to be a substantial need for affordable housing, with 36% of the population being cost-burdened in their housing. The western part of the City is beginning to see an increase in property values, but other areas show a decline over the past 6 years. Further analysis of our housing market with updated census information would be helpful.

Public Housing

The Springfield Metropolitan Housing Authority reports they do not have any fair housing problems at this time and that their last HUD fair housing review showed no problems. In the past five years they completed a substantial project of Lincoln Park, HOPE VI, which has replaced their aging rental housing with new units that provided a significant facelift for the southern part of Springfield.

They work hard to encourage their housing choice voucher holders to locate in higher income areas, although many do not choose to do so. They were unable to provide information on demographics of their sites, stating that they no longer maintain those records in an easily accessible method. They would like to continue to partner with the City of Springfield to provide fair housing education for both their staff, residents and voucher landlords.

Realtor Community

Much progress has been made in the area of fair housing, since the enactment of the law in 1968. Realtors must complete fair housing education as part of their initial licensing, and renewals. However, this review indicates that both the Realtors and consumers believe that there continue to be fair housing problems in Springfield similar to those identified in the past impediment listing. New areas of concern noted by both Realtors and consumers are: retaliation for filing a fair housing complaint, familial status discrimination and discrimination against LGBT residents (now a protected class for all HUD-funded programs). The Realtor suggestions for future action provide some possible strategies for both the City and the Board of Realtors that could be implemented. A key suggestion is to provide specific training on areas where the fair housing law is being violated, so that they can attend to these problems

Lending Community

The lending climate continues to be affected by the aftermath of predatory lending, which caused many of the foreclosure problems. The related economic downturn and tightening of credit has led to a significant decrease in home purchase. In addition, the foreclosure problem although community wide, is more pronounced in those areas of the City with the highest minority population. The number of foreclosures has begun to decline, but still poses a significant community problem.

This analysis reports that minorities are not able to purchase homes at the same rate as the majority population. Whether this is because of discrimination in the initial application process, in the loan processing or due to person credit issues is not clear. The perception of many, as evidenced by the Focus Groups, is that there is discrimination against minorities during the loan process and that the credit scoring process provides a significant barrier to homeownership.

Focus Groups

As part of this analysis, the City contracted with Harper Mack Group to conduct ten focus groups with the community to provide an inside look at fair housing issues. This research indicates that people in our community still have many fair housing concerns which go unreported, perhaps due in part to concern of retaliation. The groups

indicated that many areas identified in earlier analyses of impediments are still a concern, and also added issues related to retaliation, familial status, absentee landlords, sexual preference, disability discrimination, need for assessable housing, lender red-lining, and discrimination against Muslims. They were also concerned about the problem with people with criminal backgrounds being denied housing and would like action by the housing authority toward that problem. Some issues identified were much bigger than fair housing, including immigration, veteran awareness of their benefits and a general sense of hopelessness. The focus group members offered many suggestions for fair housing action that can be considered for future planning.

Fair Housing Testing

The City contracted with Miami Valley Fair Housing Center to conduct fair housing testing. In the majority of cases, it appears that real estate professionals are "doing the right thing," and have knowledge of the fair housing laws. Especially in the area of race, there was only one instance out of 12 indicating a problem. However in six of fourteen tests related to disability status in rental housing, there showed evidence of discrimination.

Fair Housing Complaints

Fair Housing Complaints filed with the U.S. Department of Housing and Urban Development during the time period of this report indicate that there is a problem in the area of disability discrimination. In other areas, either there is less discrimination going on, or it remains unreported, but there was at least one case involving familial status, race, national origin, religion and color. The lack of complaints may also indicate lack of awareness of the fair housing rights and/or fear of retaliation.

Public Policies

The City of Springfield takes the lead in pushing for economic development, neighborhood revitalization, care for the homeless, and homeless prevention. They have exemplary policies to provide equal housing opportunity, demonstrated by their affirmative marketing policy, their fair housing ordinance, their affordable housing policy, their nonrestrictive zoning code. They have also aggressively addressed the problem of lead-based paint through six grants with HUD. The current Consolidated Plan incorporates efforts to target transitional areas for housing rehabilitation, demolish blighted housing, enhance Code Enforcement, expand tax credit projects for new housing opportunities, develop a green space policy and improve the city corridors.

City of Springfield Actions

During the reporting period, the City of Springfield Fair Housing Office has maintained an active presence in the City promoting equal opportunity in housing during the past five years, addressing impediments in earlier analysis. Progress has been made in providing fair housing education to both housing consumers and housing providers. Gross discrimination is not occurring on a wide scale, evidenced by relatively few incidents of reporting. However, there are still fair housing concerns requiring ongoing vigilance and action.

Impediments to Fair Housing

Thirteen areas are identified in this analysis of ongoing fair housing concern for the City of Springfield. These are: racial segregation/racial steering, discrimination against Latinos, discrimination against persons with disabilities, discrimination against African-Americans, discrimination against families with children, substandard rental housing,

home loan discrimination for minorities, need for fair housing education of both housing consumers and housing providers, lead-based paint hazards especially for children and minorities, retaliation for filing fair housing complaints, veteran's housing concerns and LGBT discrimination.

II Demographic Summary of the protected classes

For the purposes of this analysis, the focus is primarily on 2010 census data, but some attention is given to population shifts over time.

A. General Statistics

At the time of 2000 Census, there were 65,358 persons living in the City of Springfield, with 144,742 living in Clark County. The City population declined 4,129 persons between 1990 and 2000. However, areas outside the city limits actually increased in population by 2,323 persons during the same 10-year period. The 2010 Census showed that there are now 60,600 persons living in the City of Springfield, with 138,333 persons living in Clark County, a ten-year decline of 6,409 for the County, and a decline of 4,752 in the City of Springfield. This indicates that the City has lost 14% of its population in the past 20 years, although the County, outside the City limits has remained relatively stable, losing only .9% of their population. The City of Springfield could be categorized as a shrinking city. Since 1970, Springfield has lost 20,000 people or 28% of their population.

TABLE 1: TOTAL POPULATION, SPRINGFIELD/CLARK COUNTY

TOTAL POPULATION	1990	2000	2010
CLARK COUNTY	147,548	144,742	138,333
CITY OF SPRINGFIELD	70,487	65,358	60,606
COUNTY (OUTSIDE CITY)	77,061	79,384	77,727

TABLE 2: DECLINE IN POPULATION, SPRINGFIELD/CLARK COUNTY

TOTAL POPULATION	DECLINE(%) 2000-2010	DECLINE (%) 1990-2010
CLARK COUNTY	6,409 (4.4%)	9,215 (6.2%)
CITY OF SPRINGFIELD	4,752 (7.3%)	9,881 (14.0%)
COUNTY (OUTSIDE CITY)	1,657 (2.1%)	666 (0.9%)

B. Gender

There are more females than males living in Springfield. In 2010, there were 32,743 females (52.4%) and 28,865 males (47.6%). This indicates a slight shift in population, since the 1990 census, with a 1% increase in the number of males, and related 1% decrease in the number of females. Clark County also has fewer males with 66,989 (48.4%) males, and 76,843 (52.08%) females in 2010, with also a slight decrease in the percentage of females and an increase in the percentage of males.

TABLE 3: GENDER CHARACTERISTICS

	MALES			FEMALES		
	1990	2000	2010	1990	2000	2010
TOTAL COUNTY (TC)	70,705 (47.92)	69,569 (48.1)	66,989 (48.4%)	76,843 (52.08)	75,173 (51.9)	71,344 (51.6%)
CITY OF SPRINGFIELD (CS)	32,841 (46.59)	30,826 (47.2)	28,865 (47.6)	37,646 (53.41)	34,532 (52.8)	32,743 (52.4)
COUNTY (OUTSIDE CITY) (OC)	37,864 (49.14)	38,743 (48.8)	38,124	39,197 (50.86)	40,641 (51.2)	38,601

C. Race

The majority of persons in Springfield are White (45,607 or 75%), with the Black population being the second largest racial group (10,981 or 18%). However there are a growing number of Hispanics, now accounting for 3% or 1824) of the City population. The percentage of Blacks in the City was down 1.5% from 200. In terms of actual numbers, the City lost 5,294 Whites and 1800 Blacks in population, gaining and 1054 Hispanics. In the County, outside the city limits, there was a loss of 3509 Whites, 131 Blacks and a gain of 1052 Hispanics. This follows demographic shifts in the population at large in the United States, as the Hispanic population is becoming a larger percentage of the total population.¹

Other races represented in the City include Asian (455), American Indian (223) and Native or Pacific Islanders (14).

However, as the tables below show, one thousand three hundred ninety-six (1,396) persons reported associating themselves with 2 or more races. Two thousand two hundred eighty-six (2,286) persons report themselves as being 2 or more races. This makes comparison with census figures before 2000 difficult.

TABLE 4: RACE CHARACTERISTICS

	WHITE			BLACK		
	1990	2000	2010	1990	2000	2010
Total County	133,242 (90.3)	127,541 (88.1%)	119,440 (86.3)	13,031 (8.83)	14,059 (9.7)	12,128 8.8
Total City	57,523 (81.61)	52,229 (79.9)	45,607 (75.2)	12,250 (17.38)	12,781 (19.6)	10,981 (18.1)
Total Outside City	75,719 (98.26)	77,342 (97.2)	73,833 (95)	781 (1.01)	1,278 (1.4)	1,147 (1.5)

¹ Note: The numbers used here involve some duplication, because some people report that they are of more than one race. The 2000 census gave persons the chance to indicate multiple races.

HISPANIC			
	1990	2000	2010
TOTAL COUNTY	970 (.66)	1,699 (1.2)	3,805 (2.8)
TOTAL CITY	458 (.65)	770 (1.2)	1824 (3.0)
TOTAL OUTSIDE CITY	512 (.66)	929 (1.2)	1981 (2.6)

Beginning in 2000, the census reporting for race has changed substantially, by allowing people to indicate multiple races. In 1990, race reporting was more simplistic. Table 5 shows a comparison of race statistics between the City and County for 2000 and 2010 as reported in the decennial censuses.

TABLE 5: NEW RACE STATISTICS

	2000 Clark County		2000 Springfield	
	Number	%	Number	%
One race	142,456.00	98.40	63,962.00	97.90
White	127,541.00	88.10	51,007.00	78.00
Black or African American	12,954.00	8.90	11,909.00	18.20
American Indian and Alaska Native	402.00	0.30	223.00	0.30
Asian	761.00	0.50	455.00	0.70
Native Hawaiian and Other Pacific Islander	31.00	0.00	14.00	0.00
Some other race	767.00	0.50	354.00	0.50
Two or more races	2,286.00	1.60	1,396.00	2.10
Hispanic or Latino (of any race)	1,699.00	1.20	770.00	1.20

	2010 Clark County		2010 Springfield		U.S.
	Number	%	Number	%	%
One race	134,824.00	97.50	63,962.00	97.90	0.98
White	119,440.00	86.30	45,607.00	75.20	0.75
Black or African American	12,128.00	8.80	10,981.00	18.10	0.12
American Indian and Alaska Native	351.00	0.30	201.00	0.30	0.01
Asian	858.00	0.60	455.00	0.80	0.04
Native Hawaiian and Other Pacific Islander	51.00	0.00	25.00	0.00	0.00
Some other race	2,325.00	1.70	1,131.00	1.90	0.06
Two of more races	3,509.00	2.50	2,404.00	4.00	0.02
Hispanic or Latino(of any race)	3,805.00	2.80	1,824.00	3.00	0.13

D. Familial Status

In the City of Springfield 24.4% of the population is under the age of 18. In Clark County, 30.9% of the population is under 18. Both the City and County have a higher percentage of children in 2010 than they did in 1990 and 2000, although the percentage of children under the age of 5 has not increased significantly.

TABLE 6: FAMILIAL STATUS: CHILDREN UNDER THE AGE OF 5 AND 18

	Under 5			Under 18		
	1990	2000	2010	1990	2000	2010
Total County (TC)	10,253 (6.95)	9,480 (6.5)	8,672 (6.3)	29,751 (20.16)	26, 873 (18.56)	32,643 (30.9)
City of Springfield (CS)	5,475 (7.77)	4,920 (7.5)	4,618 (7.6)	14,103 (20.01)	11792 (18)	14,775 (24.4)
County (outside city) (OC)	4,778 (6.2)	4,560 (5.7)	4,144 (5)	15,648 (20.31)	15,081 (19)	17,868 (23)

In addition, the per capital income is lower in families with children, than those without children. When the percentage of children goes up by 1% point the per capita income drops by \$563, significant to 5%. In addition, families with children are more likely to be living in rental housing, than owner-occupied dwellings. (See Figure 1 below. Source: Geographer Devon Lenz' report on Springfield demographics.)²

² See Appendix 1: "Fair Housing Paper" by Devon Lenz. Wittenberg University, 2012, pp 3-4.

FIGURE 1: INCOME AND RENTAL OCCUPANCY REGRESSED ON FAMILIES WITH CHILDREN UNDER 18

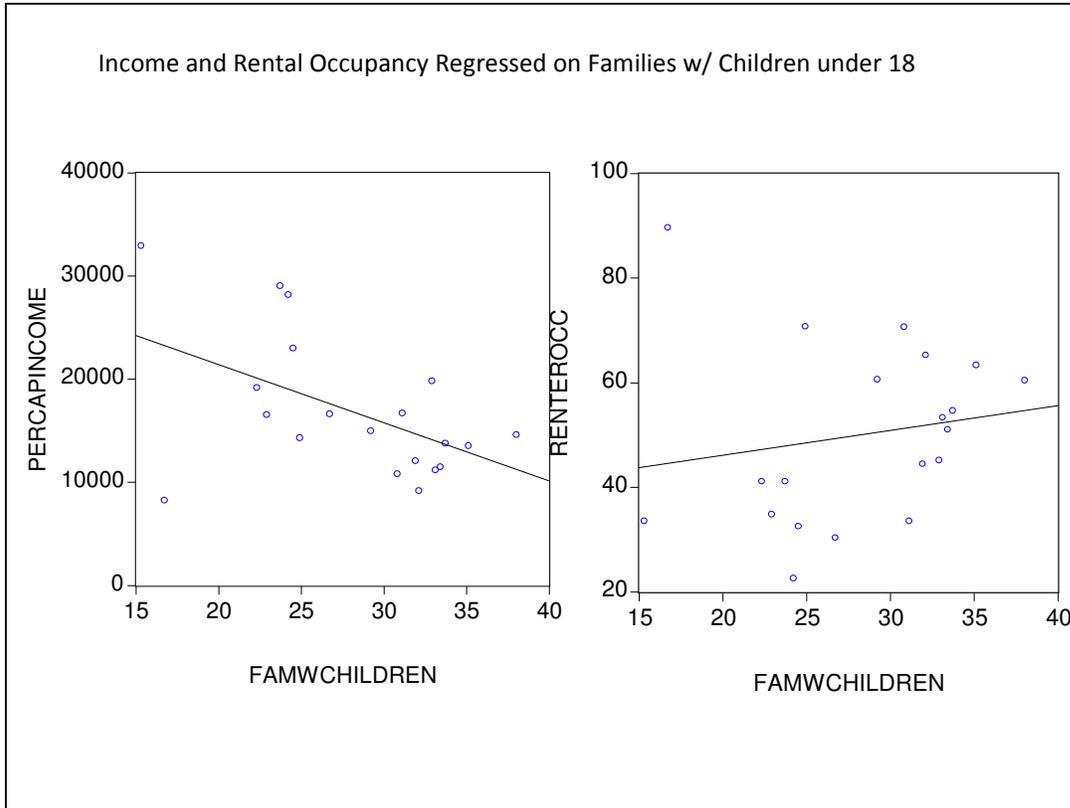


TABLE 7: CITY OF SPRINGFIELD DISABILITY STATISTICS
Source: 2009-2011 American Community Survey

	Under 5 years	5-17 Years	Percent	18-64 Years	Percent	65 Years+	Percent	Total	Percent
Hearing Difficulty	0	35	0.36%	1238	3.38%	1386	16.63%	2659	4.50%
Vision Difficulty	0	108	1.11%	1540	4.20%	462	5.54%	2110	3.57%
Cognitive Difficulty	0	735	7.53%	3284	8.95%	1004	12.05%	5023	11.24%
Ambulatory Difficulty	0	29	0.30%	4035	11.00%	2574	30.89%	6638	11.24%
Self-Care Difficulty	0	75	0.77%	1286	3.51%	952	11.42%	2313	3.91%
Independent Living Difficulty	0			3015	8.22%	1737	20.84%	4752	8.04%
Total Population	4310	9760		36679		8334		59083	

E. Disability Status

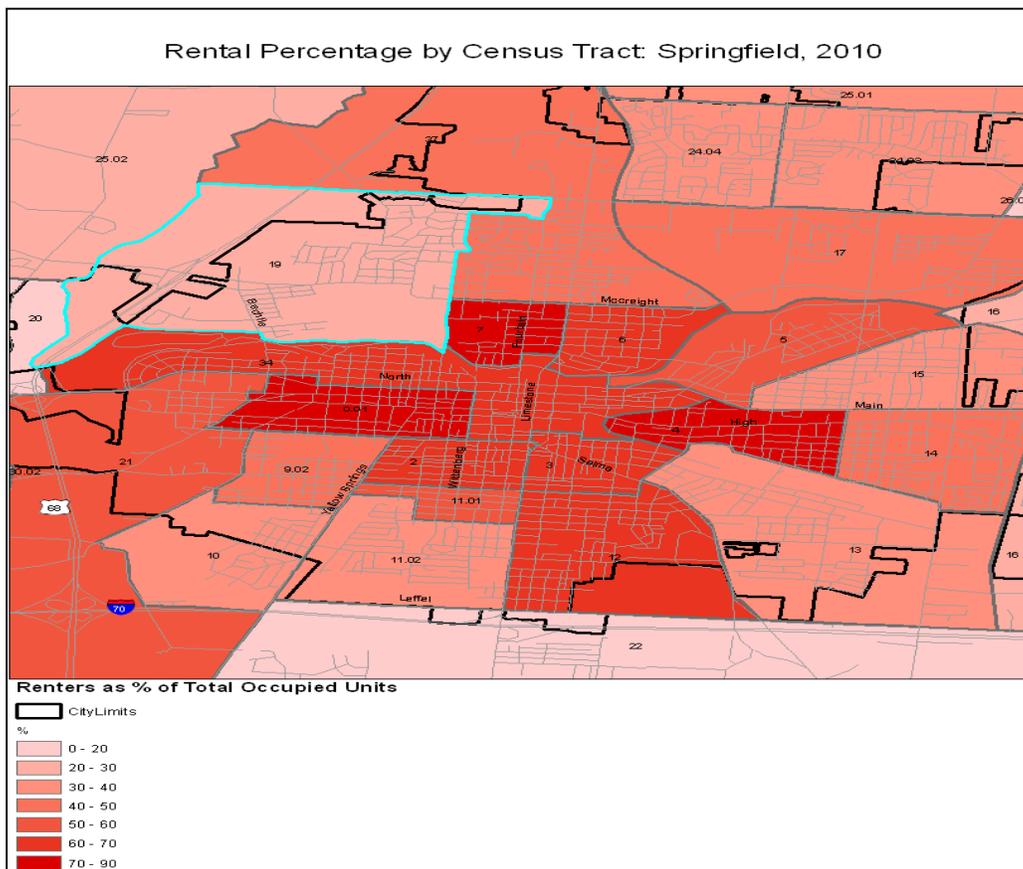
The population of persons with disabilities in Springfield is not reported in the 2010 status, but is estimated in the Community Survey for 2009-2011. This shows that

Cognitive and Ambulatory difficulties are the highest percentage of disability in the City of Springfield, with over 30% of persons 65 and older having an ambulatory difficulty, and 11 % of those 18-64 with an ambulatory difficulty. Also, 20% of those 65 and over have difficulty living independently. 11% of the population also has a cognitive difficulty, which is fairly high.

F. Rental Housing

In the City of Springfield in the 2000 census 42.8 % of the occupied housing units were renter-occupied in the 2000 census. In 2010, this number was slightly lower at 42.7%. The following map shows that areas close to the inner city have a higher percentage of rental housing than those in outlying areas, but an analysis by geographer Devon Lenz indicates there is not a positive correlation between rental housing and income.

MAP 1: RENTAL PERCENTAGE BY CENSUS TRACT: SPRINGFIELD, 2010



The Fair Housing office takes a high volume of landlord-tenant calls for information and referral. A large percentage of these calls are from tenants with complaints about repairs needed.

The City also passed an ordinance in 2001 requiring all property managers to supply tenants with a Landlord-Tenant booklet to inform tenants of their rights and of assistance available through Code Enforcement and the fair housing office.

G. Veteran Status

The State of Ohio has added Veteran Status to protected classes under the fair housing law. The 2009-2011 Community Survey estimates there are 5,434 veterans

living in Springfield, Ohio. Among the adult population of 46,398, this represents 12% of the City's population. Table 8 indicates that the median income of veterans is much higher than non-veterans in the City. Veteran males make an average of \$11,000 more than non-veteran males. And veteran females make an average of \$8,000 more than non-veteran females. However, they also estimate that the unemployment rate among veterans is 17.1% as opposed to 14% of non-veterans. Map 2 indicates that the veteran tend to live in higher income areas, away from the center city areas.

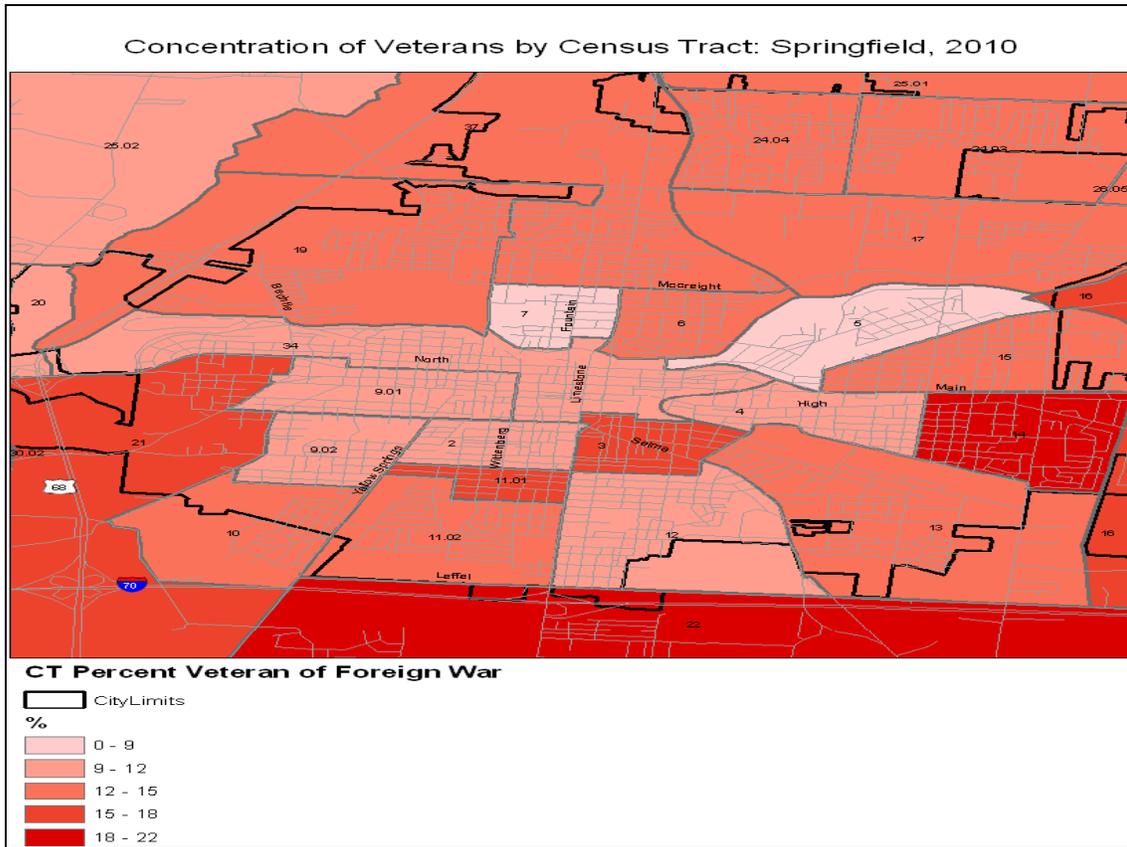
TABLE 8: VETERAN STATUS

Source: American Community Survey 3 year estimates 2009-2011

Subject		Springfield city, Ohio					
		Total		Veterans		Nonveterans	
		Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
Civilian population 18 years and over		46,398	+/-511	5,434	+/-461	40,964	+/-664
PERIOD OF SERVICE							
Gulf War (9/2001 or later) veterans		(X)	(X)	7.2%	+/-3.2	(X)	(X)
Gulf War (8/1990 to 8/2001) veterans		(X)	(X)	13.9%	+/-4.4	(X)	(X)
Vietnam era veterans		(X)	(X)	34.3%	+/-4.5	(X)	(X)
Korean War veterans		(X)	(X)	9.2%	+/-2.3	(X)	(X)
World War II veterans		(X)	(X)	8.8%	+/-2.8	(X)	(X)
SEX							
Male		45.9%	+/-1.1	93.0%	+/-2.9	39.7%	+/-1.4
Female		54.1%	+/-1.1	7.0%	+/-2.9	60.3%	+/-1.4
AGE							
18 to 34 years		32.4%	+/-1.2	8.5%	+/-3.4	35.6%	+/-1.4
35 to 54 years		30.9%	+/-1.4	25.3%	+/-4.6	31.7%	+/-1.5
55 to 64 years		16.7%	+/-1.0	26.1%	+/-4.4	15.4%	+/-1.1
65 to 74 years		9.6%	+/-0.9	20.6%	+/-3.7	8.1%	+/-0.9
75 years and over		10.4%	+/-0.9	19.5%	+/-3.4	9.3%	+/-0.8
RACE AND HISPANIC OR LATINO ORIGIN							
One race		N	N	N	N	N	N
White		78.5%	+/-1.0	80.5%	+/-3.6	78.2%	+/-1.1
Black or African American		17.1%	+/-0.6	16.4%	+/-3.1	17.2%	+/-0.7
American Indian and Alaska Native		N	N	N	N	N	N
Asian		N	N	N	N	N	N
Native Hawaiian and Other Pacific Islander		N	N	N	N	N	N
Some other race		N	N	N	N	N	N
Two or more races		N	N	N	N	N	N
Hispanic or Latino (of any race)		N	N	N	N	N	N
White alone, not Hispanic or Latino		77.7%	+/-0.9	80.0%	+/-3.5	77.3%	+/-1.0
MEDIAN INCOME IN THE PAST 12 MONTHS (In 2011 INFLATION-ADJUSTED Dollars)							
Civilian population 18 years and over with income		18,906	+/-1,322	28,810	+/-4,135	17,371	+/-1,095
Male		(X)	(X)	28,765	+/-	20,439	+/-

				4,035		2,547
Female	(X)	(X)	30,469	+/- 26,664	15,939	+/- 1,423
EDUCATIONAL ATTAINMENT						
Civilian population 25 years and over	39,025	+/-582	5,253	+/-466	33,772	+/-672
Less than high school graduate	19.2%	+/-1.6	9.3%	+/-2.6	20.8%	+/-1.7
High school graduate (includes equivalency)	38.7%	+/-1.9	42.9%	+/-4.8	38.0%	+/-2.1
Some college or associate's degree	28.2%	+/-1.8	37.8%	+/-5.8	26.8%	+/-1.9
Bachelor's degree or higher	13.8%	+/-1.6	9.9%	+/-3.7	14.4%	+/-1.7
EMPLOYMENT STATUS						
Civilian population 18 to 64 years	37,113	+/-502	3,255	+/-380	33,858	+/-640
Labor force participation rate	68.6%	+/-2.0	65.2%	+/-6.9	68.9%	+/-2.1
Civilian labor force 18 to 64 years	25,461	+/-739	2,123	+/-340	23,338	+/-799
Unemployment rate	14.3%	+/-1.9	17.0%	+/-7.8	14.1%	+/-1.9
POVERTY STATUS IN THE PAST 12 MONTHS						
Civilian population 18 years and over for whom poverty status is determined	43,847	+/-559	5,264	+/-452	38,583	+/-676
Below poverty in the past 12 months	26.1%	+/-2.3	14.1%	+/-3.6	27.8%	+/-2.5
DISABILITY STATUS						
Civilian population 18 years and over for whom poverty status is determined	43,847	+/-559	5,264	+/-452	38,583	+/-676
With any disability	24.6%	+/-1.8	30.2%	+/-5.7	23.8%	+/-1.8
PERCENT IMPUTED						
Veteran status for the population 18 years and over	2.8%	(X)	(X)	(X)	(X)	(X)
Period of service for the civilian veteran population 18 years and over	7.6%	(X)	(X)	(X)	(X)	(X)

MAP 2: CONCENTRATION OF VETERANS BY CENSUS TRACT



ANALYSIS:

The racial minority that has grown substantially in the City of Springfield in the past year are the Latinos. In 2000, there were 770 Latinos living in the city. In 2010, this had almost tripled to 1824, from 1.2% of the population to 3% of the population.

With regard to disabilities, 11.24% in the City have ambulatory difficulties; with 30% of the population under the age of 65 with ambulatory difficulties. This represents a significant need for housing for the disabled, and a large protected class that should be targeted in fair housing education. In addition 11.24% of the population has cognitive difficulties.

There is a concern that minorities and families with children, especially those in low income groups, are more likely to live in rental-occupied housing in the inner city area, where more of the housing has been classified as “substandard.”

The most significant change in demographics, besides the Latino population increase, is the shrinking nature of the town. The City has lost 7% of its population in the last 10 years, and 14% in the past 20 years. This is due in large part to loss of jobs in the region.

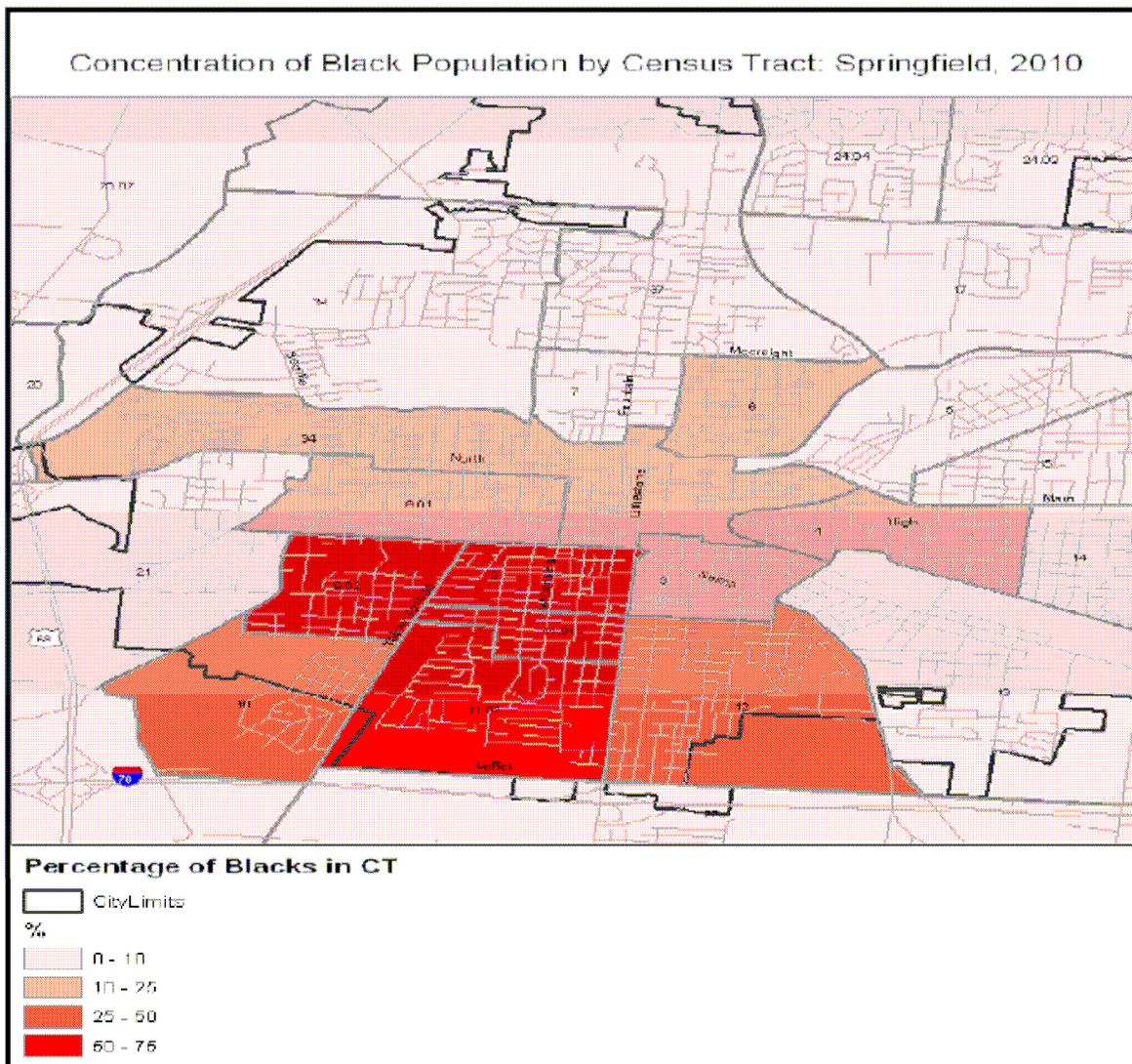
There has not been much written on fair housing in shrinking cities, but it is reasonable to conclude that this creates a different sort of problem than in the past with population. This is something that should be explored more in the future.

III RACIAL SEGREGATION

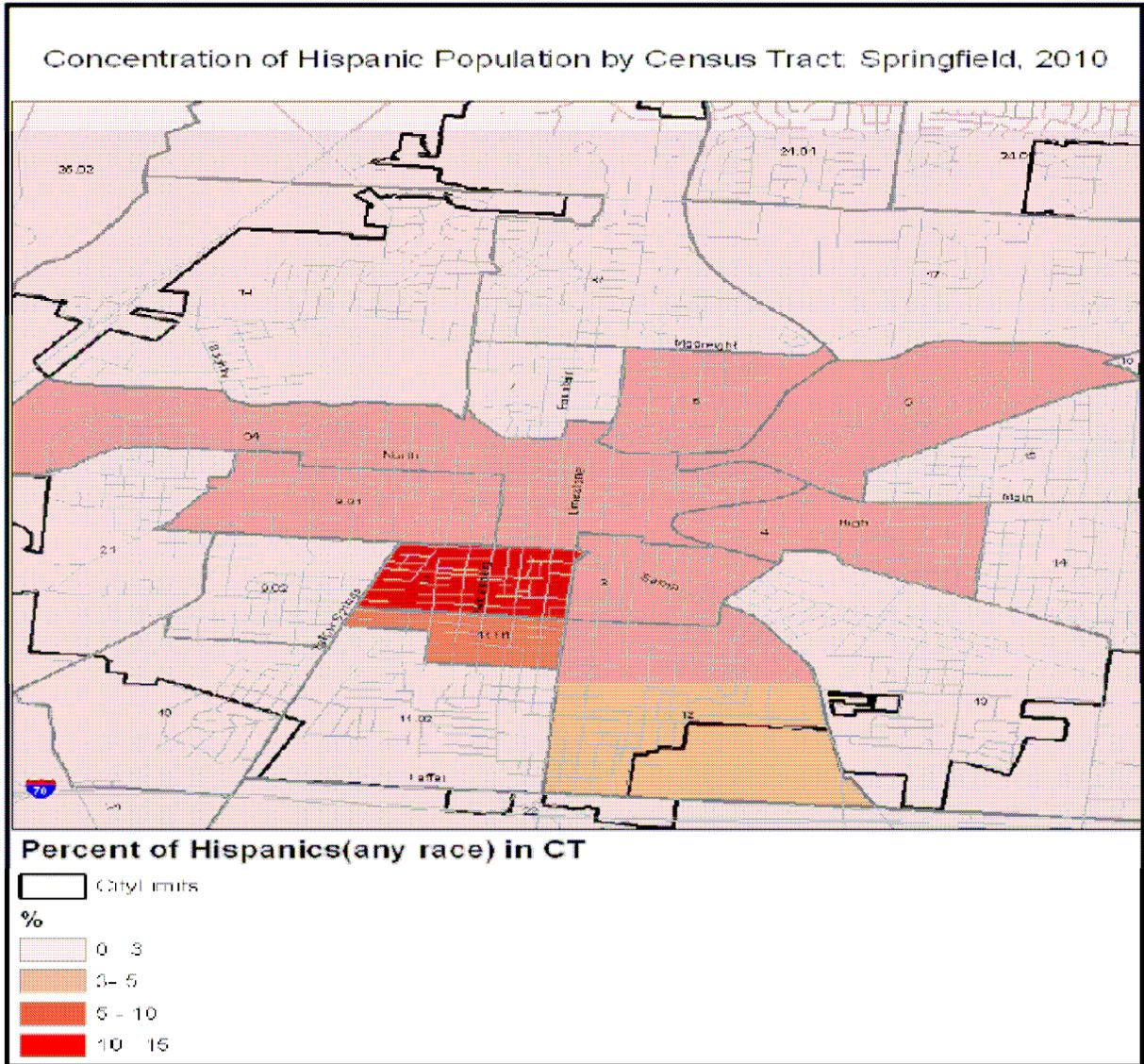
A concern in many cities is the problem of racial segregation which may mean that persons of color live in lower income areas which may be associated with a more difficult environment in terms of condition of the housing, percentage of rental housing, crime and schools.

The City of Springfield's two major minority groups are African Americans (18%) and Latino (3%). Maps of both of these groups show that there is a concentration of minorities in the southwest quadrant of the city and to some extent in the lower income inner city areas. (See Maps 3-5).

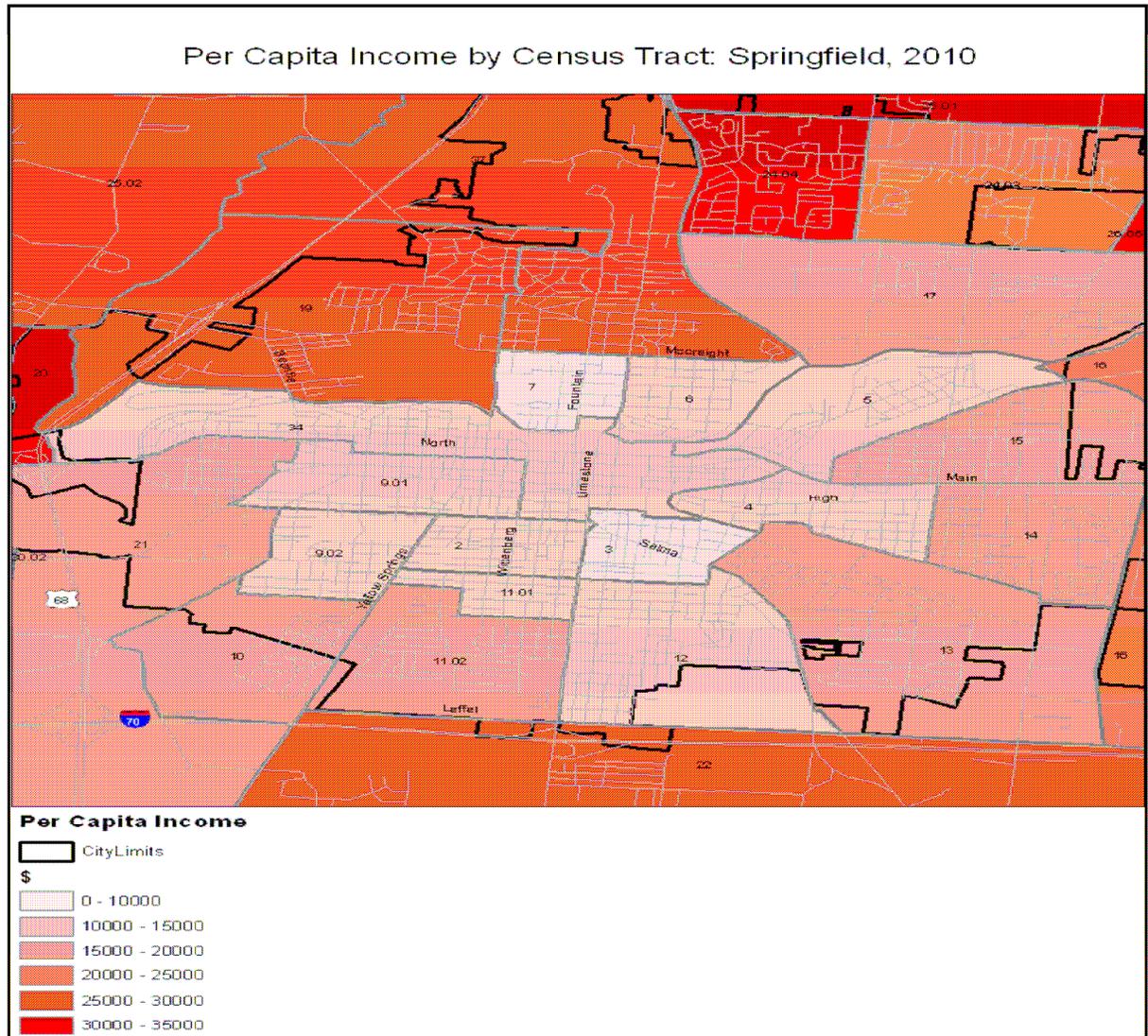
MAP 3: Concentration of Blacks by Census Tract: Springfield, Ohio 2010



MAP 4: Concentration of Latinos by Census Tract: Springfield, Ohio 2010



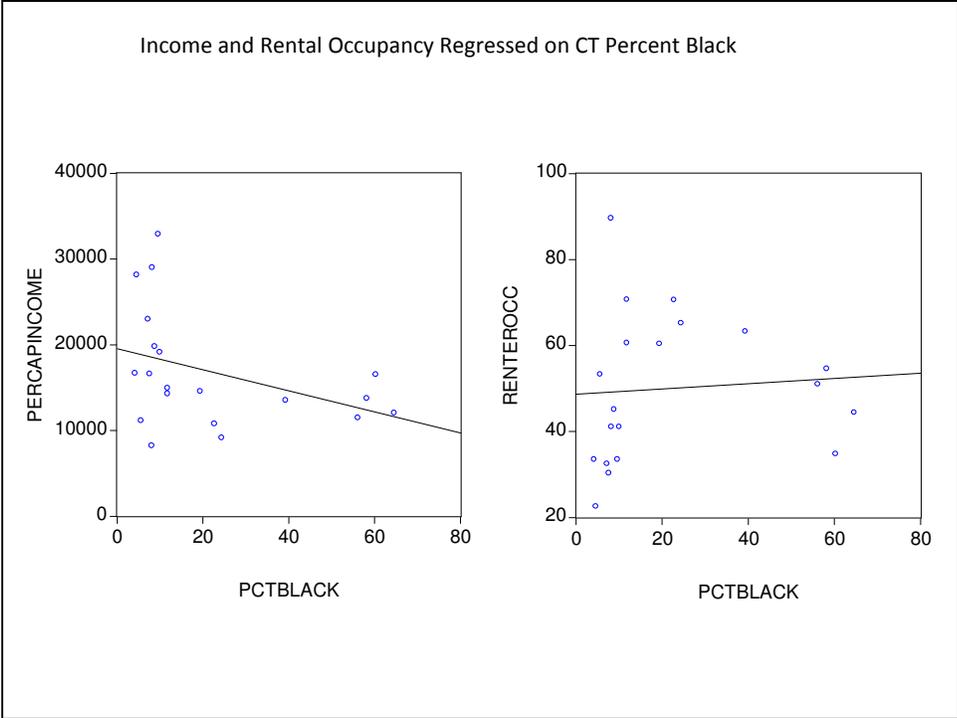
MAP 5: Per Capita Income by Census Tract: Springfield, Ohio 2010



Research by geographer Devon Lenz indicates that there is not a strong correlation between race and income level by census tract or in race and rental housing. See Figure 2: Income and Rental Occupancy Regressed on CT Percent Black. When the income of a census tract goes down, the percentage of blacks in the census tracts go up. If the concentration of black population goes up 1% there will be a \$123 lower per capita income, (Significant at 10% level). However, he cautions that the heteroskedasticity indicates the correlation is not consistent. This is probably due in part to the reality that some of the minority census tracts have higher income than non-minority tracts. The lowest income census tracts are White majority tract with Selma Road's white ghetto - Census Tract 3) and the university area (Census Tract 7). He indicates, this is a much less strong correlation than between familial status and income. He notes on the rental occupancy, the regression analysis did not prove there is a significant correlation on race and rental occupancy.³

³ Appendix 1: "Fair Housing Paper" by Devon Lenz. Wittenberg University, 2012. pp 1-5.

FIGURE 2: INCOME AND RENTAL OCCUPANCY REGRESSED ON CT PERCENT BLACK (Source: Lenz, 2012)



In our 2007 Fair Housing Analysis, maps indicated that although racial segregation is a problem in the City the Black population was becoming more dispersed throughout the City between 1990 and 2000. Research by geographer Devon Lenz indicates that this dispersion has continued between 2000 and 2010. Using a dissimilarity index approach (a standard measure for evenness), Lenz determined that that the "evenness" improved from .55 to .49, on a scale where 0 would be complete segregation and 1 would be complete integration. See Figure 3 below.

Figure 3: SEGREGATION IN SPRINGFIELD AND CLARK COUNTY. (Source: Lenz, 2012)

Segregation

- Dissimilarity Index: Standard Measure of evenness
- $D = 0.5 \cdot \left| \frac{b_i}{B} - \frac{w_i}{W} \right|$
- Where b_i = CT black pop'n, w_i = CT white pop'n, B = city's black pop'n, W = city's white pop'n
- $D = .55$ for Spfld in 2000, $D = .49$ in 2010
- $D = .63$ for Clark co. in 2000, $D = .58$ in 2010

ANALYSIS

The reality of racial segregation continues to be a fair housing concern in the City of Springfield. While the trend toward integration is apparent, the movement is slow. When one considers the larger region of Clark County, where the dissimilarity index also shows progress, there is an even greater segregation. The Black population of Clark County outside the City limits of Springfield is only 1.5% (See Table 9). This indicates a need for continual vigilance, education and enforcement to continue the progress of opening the doors of equal housing opportunity to all members of our community.

TABLE 9: PERCENT MINORITY IN CLARK COUNTY, CITY OF SPRINGFIELD AND CLARK COUNTY OUTSIDE OF SPRINGFIELD

	Total	White	%White	Black	%Black	Latino	%Latino
Clark Co	138333	119140	86.13%	12128	8.77%	3805	2.75%
Springfield	60608	45607	75.25%	10981	18.12%	1824	3.01%
Outside Springfield	77725	73533	94.61%	1147	1.48%	1981	2.55%

IV Housing Market

Cost Burden & Housing Problems

Approximately 30% of all Springfield households are considered to be cost burdened. Generally, when a household spends more than 30% of its gross income on housing it is considered excessive, and the household is classified as cost burdened. When households pay higher proportions of their incomes for housing, they are forced to sacrifice other basic necessities such as food, clothing, and health care. Additionally, households that are cost burdened may have trouble maintaining their dwelling. Cost burden is a particular concern among low income households who have fewer housing choices.⁴

As shown in the following table, CHAS 2000 Data reported that City wide there were 7,111 units with housing problems (27.1% of total households) and 6,596 cost burdened households (25.1% of total households). Of the total 11,306 renter households, there were 4,364 experiencing housing problems (nearly 40%). Of the 14,928 owner households, 2,747 were experiencing housing problems (about 20%).

In Springfield, renters are more likely to experience housing problems and are nearly twice as likely to be cost-burdened than owners. Over one-third of total renters are cost burdened while only 17.3% of owners are experiencing similar financial strains, suggesting a demand for more affordable rental housing.

⁴ The information on cost burden, housing needs and housing needs by Race are excerpts from the City of Springfield Three-Five Year Strategic Plan. It is based on 2000 census data. An update with 2010 census data is not yet available. See Appendix 2: Springfield 3-5 Year Strategic Plan

Table 10: Cost Burden for All Households, 2000

Income Category of Household	Total	% of Total	Any Housing Problem*		Cost Burden			
					30%-50%		More than 50% (Severe)	
			Total	%	Total	%	Total	%
Renter Households								
Extremely Low (0-30% MFI)	3,460	31%	2,367	68%	2,329	67.3%	1,737	50.2%
Very Low (31-50% MFI)	2,102	19%	1,301	62%	1,202	57.2%	240	11.4%
Low (51-80% MFI)	2,665	24%	456	17.1%	365	13.7%	101	3.8%
Above 80% MFI	3,079	27%	240	7.8%	120	3.9%	49	1.6%
Total Renters	11,306	100%	4,364	38.6%	4,014	35.5%	2,126	18.8%
Owner Households								
Extremely Low (0-30% MFI)	993	7%	733	73.8%	729	73.4%	515	51.9%
Very Low (31-50% MFI)	1,801	12%	821	45.6%	807	44.8%	263	14.6%
Low (51-80% MFI)	3,094	21%	718	23.2%	690	22.3%	145	4.7%
Above 80% MFI	9,040	61%	479	5.3%	362	4%	27	0.3%
Total Owners	14,928	100%	2,747	18.4%	2,583	17.3%	940	6.3%
All Households								
Total All Households	26,234	100%	7,111	27.1%	6,596	25.1%	3,066	11.7%

Source: HUD State of the Cities Data Systems: CHAS Data 2000

* Any Housing Problem - cost burden greater than 30% of income, and/or overcrowding, and/or without complete kitchen or plumbing.

Among owner households, African-Americans have the highest percentage of housing problems, while Hispanics have the highest percentage of housing problems among renter households. Among all households, 40% of Hispanics are experiencing housing problems, while a third of African-Americans and one-quarter of whites are dealing with housing problems.

Both Hispanic and white owner households, at 16% and 17% respectively, are living with housing problems. In comparison, over one-quarter of African-American owner households are living with housing problems. In terms of renters, all three races tend to experience high percentages of housing problems within their populations. Nearly half of the total Hispanic renter population has housing problems. However, there are only 78 Hispanic renters living with housing problems, which is not such a staggering number when compared with white and African-American renters living with housing problems - 3,213 and 979 respectively. Nonetheless, both white and African-American populations are expected to decrease, while the Hispanic population is expected to increase. The current trends among Hispanic renters experiencing housing problems and expected increases in Hispanic population further contribute to the growing demand for more affordable rental housing.

Table 11: Households with Housing Problems by Race, 2000

Income Category of Household	African-American Households, 2000			Hispanic Households, 2000			White, Non-Hispanic Households, 2000
	Total	Any Housing Problem*		Total	Any Housing Problem*		Total
		Total	%		Total	%	
Renter Households							
Extremely Low (0-30% MFI)	1,010	675	66.80%	53	39	73.60%	2,290
Very Low (31-50% MFI)	430	220	51.20%	18	4	22.20%	1,610
Low (51-80% MFI)	500	70	14.00%	65	15	23.10%	2,025
Above 80% MFI	495	15	3.00%	24	20	83.30%	2,420
Total Renters	2,435	979	40.20%	160	78	48.80%	8,345
Owner Households							
Extremely Low (0-30% MFI)	215	190	88.40%	0	0	0.00%	760
Very Low (31-50% MFI)	239	110	46.00%	14	4	28.60%	1,485
Low (51-80% MFI)	510	190	37.30%	8	4	50.00%	2,525
Above 80% MFI	1,195	90	7.50%	29	0	0.00%	7,680
Total Owners	2,159	580	26.90%	51	8	15.70%	12,450
All Households							
Total All Households	4,594	1,559	33.90%	211	86	40.80%	20,795

Source: HUD State of the Cities Data Systems: CHAS Data 2000

* Any Housing Problem - cost burden greater than 30% of income, and/or overcrowding, and/or without complete kitchen or plumbing.

Housing Trends Summary

- Owner occupied units and renter occupied units are declining, while vacant units are increasing.
- Married couple households with/without children and single parent households with children are declining, while non-family households and single households with no children are rising. Therefore, the demand for larger housing units will decline, while demand for rental units and smaller units should rise.
- There is a growing demand for more affordable rental housing as 36% of total renters are considered to be cost burdened, and 40% are living with housing problems.
- The demand for housing in Springfield is low, as there continues to be a decline in sales prices, a decline in the number of transactions, and an increase in the length of time a unit remains on the market. Additionally, the margin between median list prices and sales prices is widening.
- When adjusted for inflation, the median household income has remained stable since 2000 (around \$40,000). Unsurprisingly, residential sales transactions increased only among homes costing \$40,000 and below.
- From 1990 to 2013, Springfield is projected to lose a total of 15,317 residents, about one-fifth of the original 1990 population. Springfield's most stable population lies within the range of the 55 to 74 year age group, while most other age groups are projected to decline.

2. Disproportionately Greater Needs by Race

Disproportionately greater need exists when the percentage of persons in a category of need, who are members of a particular race or ethnic group, is at least ten percentage points higher than the percentage of persons in the category as a whole. White, Black, Hispanic, and other households, both renters and owners, can experience disproportionately greater need in a range of income levels. In Springfield, there are a variety of races and ethnicities in different income levels that are experiencing disproportionately greater need. The following table shows those households by race and income level that have a disproportionately greater need and are experiencing more housing problems than the average household in the City of Springfield.

Table 12: Disproportionately Greater Need by Race, 2000

	% of Households w/ Any Housing Problem*	
	Renters	Owners
White Non-Hispanic Households		
Extremely Low (0-30% MFI)	69.9%	69.7%
Very Low (31%-50% MFI)	65.2%	44.8%
Black Non-Hispanic Households		
Extremely Low (0-30% MFI)	66.8%	88.4%
Very Low (31%-50% MFI)	51.2%	46.0%
Low (51%-80% MFI)	--	37.3%
Hispanic Households		
Extremely Low (0-30% MFI)	73.6%	--
Very Low (31%-50% MFI)	--	28.6%
Low (51%-80% MFI)	--	50.0%
Above 80% MFI	83.3%	--
All Households	38.6%	18.4%

Source: HUD State of the Cities Data Systems: CHAS Data 2000

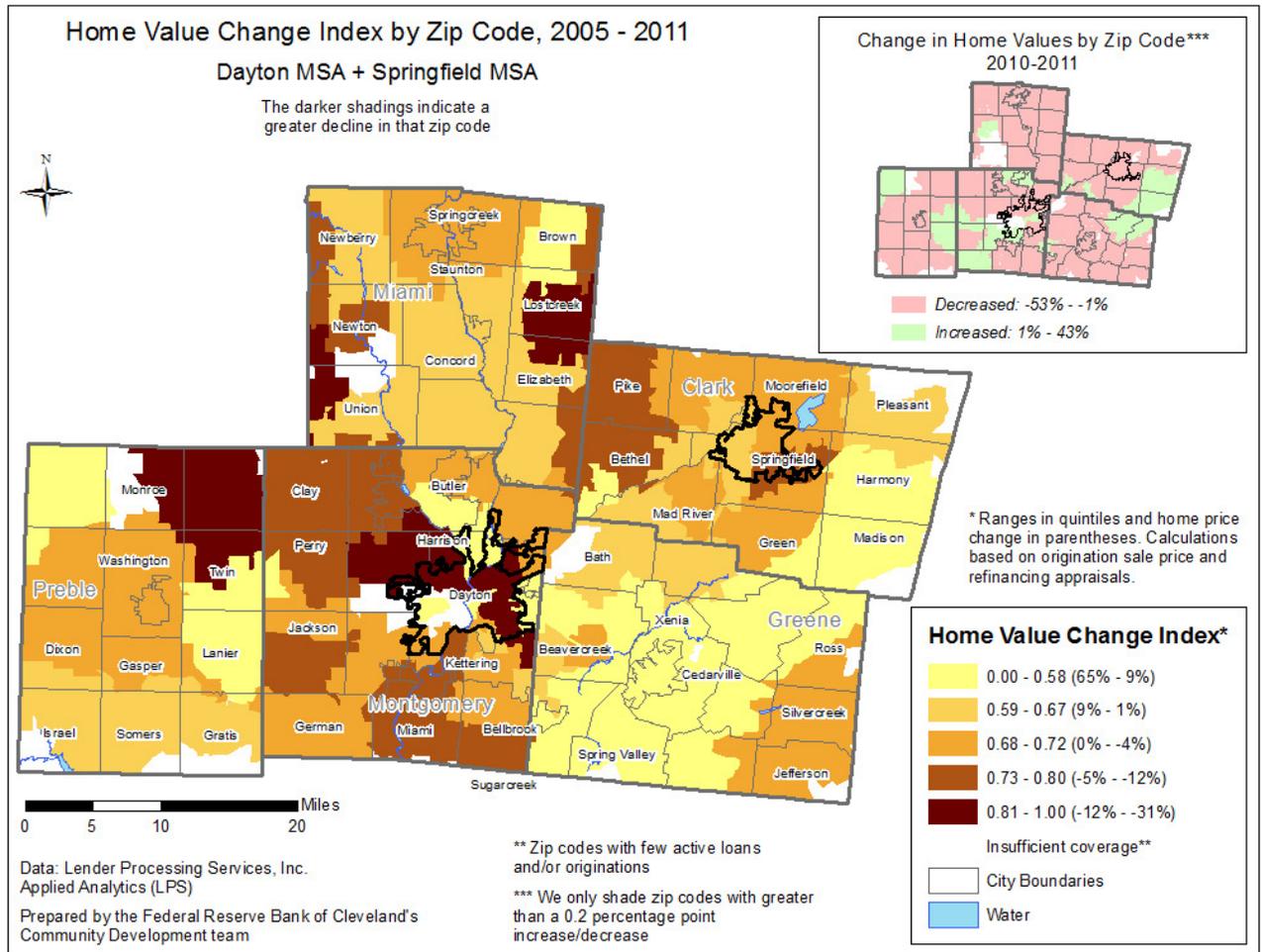
*Any Housing Problem - cost burden greater than 30% of income, and/or overcrowding, and/or without complete kitchen or plumbing.

In the City of Springfield, households experiencing a disproportionately greater need in regard to housing problems are not limited to certain income levels or races. On the contrary, this greater need ranges across various races and income levels. The percentage of total households with any housing problem in Springfield is 38.6% for renters and 18.4% for owners. Renter households experiencing greater need are extremely low and very low income white and black households. In addition, extremely low income Hispanic renter households are also experiencing greater housing problems. With regard to owner households, extremely low and very low income white households, extremely low, very low, and low income black households, and very low and low income Hispanic households are also experiencing a disproportionately greater need and increased housing problems. In addition, Hispanic owner households making above 80% of the median income are also experiencing disproportionately greater need.

Recent Home Value Change Report

A recent home value change report from the Federal Reserve Bank suggests that property values have started to increase in some areas of town on the western side in zip code areas 45504 and 45506 with a 1-9% increase in value between 2005 and 2011. (See Map 6 below.) However the other areas still show a net decline. Houses in Springfield's southeast quadrant (within the zip code 45505) have experienced a 12-31% decline in housing values in the last six years. The northern area (within zip code 2003) has experienced a 0% to 4% decline in value. Houses on the western side of Springfield, however in zip code areas 45504 and 45506 have experienced a 1-9% increase in value.

MAP 6: Home Value Change by Index by Zip Code, 2005-2011



Analysis

In terms of our fair housing issue, there is a concern that minority households have more of a cost burden, more rental housing and more problems with housing. A high percent of all renters are experiencing problems with their housing and there continues to be a substantial need for affordable housing, with 36% of the population being cost-burdened in their housing. Further analysis of our housing market with updated census information would be helpful.

V Public Housing

Springfield Metropolitan Housing Authority (SMHA) manages public housing in the City of Springfield and Clark County, Ohio. On March 28, 2012, the Fair Housing Coordinator met with their leadership team, including: Director, Arlin Tolliver, the Deputy Director, Anita Perrin, and the Housing Choice Voucher Coordinator, Sherry Fleming. The following is a summary of the information they provided. (See Appendix 3 for materials and full summary)

A. Affirmative Marketing Plan.

SMHA has an affirmative marketing plan as part of their agency plan. They encourage voucher holders to encourage tenants to locate rentals outside of inner city areas and provide a packet with a map and demographic information so they can see the area and possible areas for location.

B. Reasonable Accommodations Policy.

SMHA follows HUD guidelines granting reasonable accommodations and modifications. If a tenant doesn't know they have this right, their policy is to work with them on it. They also said they would appreciate any help from the fair housing office in the area of training and handouts for their tenants.

C. Fair Housing Posters

SMHA posts HUD fair housing posters in all of their units.

D. Fair Housing Training for Staff.

Their staff members attend the Fair Housing Board's annual fair housing training and they also encourage their Section 8 property managers to attend.

E. Fair Housing Materials.

All tenants are given a copy of the HUD fair housing booklet, the HUD fair housing complaint form and the City's landlord-tenant booklet, with fair housing information upon move in.

F. Racial Makeup of Public Housing Units.

Statistics provided for this analysis were for their programs as a whole, but not by individual unit, which staff said were not available. In public housing, they have 64% white, 36% Black/African-American only and 1% Hispanic or Latino only. In their voucher assistance program, 53% are white only, 45% are African-American/Black only, with 2% Hispanic or Latino.

G. Racial Segregation in SMHA units.

SMHA stated upon review that they do not have a problem with racial segregation. They said that tenants are assigned units as they become available. If they turn down the first location, they go to the bottom of the waiting list, but are given a second

location as an option when they reach the top of the waiting list again. They said that they have found their residents choose City units because of proximity to transportation, child care and family. For example, African-American residents have turned down units in New Carlisle, which is primarily white, because of these reasons.

H. HOPE VI Final Report

The HOPE VI project demolished 210 obsolete wood-frame units and replaced them with 146 new houses and 24 lease-to-own houses, helping improve the housing stock in that area of town. Ten eligible households purchased existing homes using HOPE VI funds for down payment and closing costs. The improvement to the neighborhood has been significant. Drug activity has diminished. The project includes a community center which has been a location for computer classes, employment training and activities. Residents were given housing choice vouchers and then an option to relocate back into the new houses. Of the 176 households, 28 returned to the neighborhood.

I. Fair Housing Review

Their last fair housing review was in 2008, with a copy on file in their office. They had another review scheduled for September 2012, which has been postponed. They will forward a copy of their next review when it is available.

J. Promoting Housing Choice for certificate and voucher holders.

They gave a copy of the packet that they give at their voucher briefings. They have a sheet called "expanding housing opportunities program", which states their policy is to "encourage voucher holders to seek housing units outside areas of minority and poverty concentration." They attach maps showing minority and poverty concentrations. Although they do this, they say many of their voucher holders still prefer to locate in the inner city areas, do to family, transportation, job and childcare concerns.

K. Provisions to accommodate persons with physical disabilities.

Cole Manor in 2011 went through a renovation of their first floor to make it ADA compliant. This includes the entry way, first floor bathrooms, the kitchen counters, the elevator and water fountain.

They have also moved their Voucher Orientation meetings to Lincoln Park Community Center, along with other meetings because their facility is accessible.

Hope VI had 15 units fully accessible for persons with mobility impairment. They also have 2 accessible for persons with sight/hearing impairment. They also had two accessible homes in the lease to purchase segment.

L. Concerns related to impediments to fair housing in Springfield and Clark County

None noted, except for education needed for their residents on disability issues.

M. Actions they would like the City to undertake to reduce barriers to fair housing

They would like printed information and possibly training. Fair Housing Coordinator reminded them that Miami Valley Fair Housing is willing to provide training for their staff at no cost, and the City will continue to provide annual training and printed materials..

They also said they appreciate mediation services to help with conflict in the apartment buildings and also the annual fair housing training for both their staff and for their Section 8 property managers.

They also mentioned they really appreciate assistance from the City with the Lead-Safe Grants which helps when they have children with lead-based paint poisoning in Section 8 units.

Analysis

In self-reporting, the Housing Authority does not indicate they have any fair housing problems at this time, and also that they have not had a fair housing review since the last analysis, which showed no problems. They expect another review soon and will forward the results to the fair housing office.

In the past five years they completed a substantial project of Lincoln Park, HOPE VI, which has replaced their aging rental housing with new units that provided a significant facelift for the southern part of Springfield.

They work hard to encourage their housing choice voucher holders to locate in higher income areas, although many do not choose to do so. They were unable to provide information on demographics of their sites, stating that they no longer maintain those records in an easily accessible method.

They would like to continue to partner with the City of Springfield to provide fair housing education for both their staff, residents and voucher landlords.

VI Real Estate Community

A. Survey of Market.

The Executive Board of the Springfield Board of Realtors has 12 members. One member is African-American and one of Asian descent. In 2012 they had 33 Broker office members, with a total of 194 members. Two brokers are African-American. Of the 194 Realtors, 9 are African American and 1 Asian. 7 brokerage offices have minority Realtors, and the other 26 only have white Realtors. (See Appendix 4)

B. Self-Report Survey.

All Springfield Realtors were invited to participate in an online survey concerning fair housing. The survey was sent out three times in May and June 2012. There were 15 responses. (See Appendix 5)

The first question asked in what ways they promote equal opportunity in fair housing. 97% indicated that they attend fair housing training. 93.7% reported that they explain the fair housing law to buyers and sellers. 62.5% discuss fair housing practice in office

meetings. 43.7 % orient new agents to fair housing practice and 12.5 % serve on the Board's Equal Opportunity Committee.

When asked about areas of fair housing concern, the Realtors believe many areas noted in our last analysis of impediments are still of concern in Springfield. More than half of the Realtors listed these areas as either somewhat significant, significant or very significant. See Table 13: Impediments to Fair Housing Ratings by Realtors.

Table 13: Impediments to Fair Housing Ratings by Realtors

	1	2	3	4	5
Race Discrimination, including racial segregation and racial steering	4	2	7	2	1
	25%	13%	44%	13%	6%
Discrimination Against Latinos	2	3	8	2	1
	13%	19%	50%	13%	6%
Fair housing issues for persons with disabilities	2	4	6	3	1
	13%	25%	38%	19%	6%
Substandard rental housing	3	7	4	1	1
	19%	44%	25%	6%	6%
Fair housing issues for minorities trying to obtain housing loans	2	4	5	3	2
	13%	25%	31%	19%	13%
Issues related to unfair subprime lending to protected classes	4	4	3	4	1
	25%	25%	19%	25%	6%
Familial Status Discrimination (against families with children)	1	2	9	2	2
	6%	13%	56%	13%	13%
Foreclosures	9	5	2	0	0
	56%	31%	13%	0%	0%
Lack of Awareness of Fair Housing Laws	3	6	5	2	0
	19%	38%	31%	13%	0%
Lead-Based Paint hazard for protected classes	2	1	7	4	2
	13%	6%	44%	25%	13%

Question posed: In our last Analysis of Fair Housing we identified the following impediments of fair housing. Please rate these items related to fair housing as to whether you think they are a 1-very significant concern, 2-a significant concern, 3-somewhat significant concern, 4-insignificant concern or 5-very insignificant concern.

Note: Top number is the count of respondents selecting the option. Bottom number is percent of the total respondents selecting the option.

Source: Online Survey sent to Springfield Board of Realtor members

Only 3/15 or 19% think that race discrimination, including racial steering is an insignificant concern. 44% thought it was a somewhat significant concern, 25% feel that it is either a very significant or significant concern. Similar results indicate that Realtors are also concerned about discrimination against Latinos, and fair housing issues for persons with disabilities.

Areas the Realtors seem most concerned about are substandard rental housing with 88% believing it is a concern on some level and a majority of them believe it is a significant or very significant concern. Likewise, 86% of the Realtors believe that foreclosures are a very significant or significant concern

The areas where at least a third of the Realtors believe they are insignificant concerns are minority access to loans, sub-prime lending and Lead-Based paint hazard, but still all of these areas still have a majority rating them as concerns.

In addition, three Realtors indicated other barriers to equal opportunity in housing. One mentioned they believe that the gay community faces discrimination in Springfield. Another barrier identified was related to assisting homebuyers. They said that systems established can be a detriment, but this person wasn't specific. Another noted that homebuyer classes should be completed in advance of home shopping, so they are not rushed prior to closing. The third problem noted involved money and credit issues.

The Realtors also were asked what actions they think would help remedy the problems and what they would like the City to do about these problems. Recommendations included: educating through seminars and booths, promoting awareness of landlord responsibilities, education on how to obtain a loan, outreach and education to homeowners, landlords and the general public. Several said the City should continue the education and outreach they are currently doing. One asked that fair housing training be more specific in terms of what kind of charges are being filed and discuss those cases. They would also like financial education to be included in high school. They would like thorough investigations of allegations and follow up to ensure discrimination doesn't happen again.

They also were asked what The Board of Realtors should do related to fair housing. Suggestions included continuing to provide training on fair housing; educating about how serious the Board takes the fair housing regulations, striving for total involvement by members, acknowledging there is an issue, being more proactive in discussing fair housing within offices, agents and lenders. Another suggested being more specific about where the violations are and push to train and get people well-trained on areas of noncompliance.

C. Testing Results.

The City of Springfield maintains a contract with Miami Valley Fair Housing to do testing of the real estate market in Springfield. Each year they conduct matched tests. These tests in recent years have not detected violations related to race, but have uncovered problems with disability violations in rental housing. A summary of the tests are on file in the Community Development office and are discussed in more detail in Section 9 of this document.

D. Realtor Focus Group.

In the Focus Groups conducted by Harper Mack Associates, the Realtor's Focus Group indicated they believe there is a problem with fair housing in Springfield related to retaliation for reporting, familial status, unfair denial of housing, and discrimination in the terms of sale, rental or services of facilities. They did not believe there was discrimination related to lending, based on protected classes.

E. Other Focus Groups.

See Section 8 of this document related to concerns expressed by other focus groups. In general, the majority of the focus groups indicate there are problems with retaliation in reporting fair housing (8/9), familial status (6/9), false denials that housing is available (8/9), racial steering (8/9), discrimination in terms of sale, rental or services (6/9).

F. Complaints.

There were 29 fair housing complaints filed with HUD in 2008-2012. Most of these were related to rental housing, which may not involve Realtors, but sometimes may. The protected classes of these complaints were race (7), national origin (1), religion (3), color (1), sex (3), familial status (4), retaliation (4) and disability (17). Of these cases, in seven they found probable cause, no cause was found in ten cases, withdrawal without resolution in three cases, lack of jurisdiction in one, conciliated/settled in two cases, withdrawn after resolution in one case and five cases were still open. (See Appendix 6 for full listing)

ANALYSIS: This review indicates that both the Realtors and consumers believe that there continue to be fair housing problems in Springfield similar to those identified in the past impediment listing. A new area of concern noted by both Realtors and consumers is retaliation for filing a fair housing complaint. Another new area mentioned is discrimination against gay residents.

The Realtor suggestions for future action provide some possible strategies for both the City and the Board of Realtors that could be implemented. A key suggestion is to provide specific training on areas where the fair housing law is being violated, so that they can attend to these problems.

VII Lender Analysis

A. Survey of Market

The number of FDIC-Insured institutions in the Springfield MSA has increased from 10 to 12 in the past five years. The ranking of these banks in terms of Market Share has remained relative unchanged. However New Carlisle Federal Savings Bank has slipped slightly to 8th place, and Fifth Third Bank has moved up to 7th place. The two new comers, Merchants National Bank and the Citizens National Bank of Bluffton have taken places 9th and 10th respectively, outpacing the other two newer banks in the area, U.S. Bank (11th) and Woodforest National Bank (12th).

Table 14: 2012 Summary of Deposits for Springfield MSA

Offices and Deposits of all FDIC-Insured Institutions

Deposit Market Share Report

Deposits as of: June 30, 2012

Sorted by: Market Share

[Run Report](#)

Selected Market					June 30, 2012					
Metropolitan Statistical Area(s): SPRINGFIELD, OH					Outside of Market		Inside of Market			
Institution Name	CERT	State (Hqtrd)	Bank Class	State/ Federal Charter	No. of Offices	Deposits (\$000)	No. of Offices	Deposits (\$000)	Market Share	
The Park National Bank	6653	OH	N	Federal	109	4,435,128	11	482,197	32.02%	
The Huntington National Bank	6560	OH	N	Federal	726	45,644,087	4	256,316	17.02%	
PNC Bank, National Association	6394	DE	N	Federal	3,037	203,143,270	7	231,893	15.40%	
KeyBank National Association	17534	OH	N	Federal	1,070	61,541,430	3	127,953	8.50%	
Wesbanco Bank, Inc.	803	WV	NM	State	111	4,272,675	4	121,741	8.08%	
Home City Federal Savings Bank of Springfield	23234	OH	SB	Federal	0	0	2	111,024	7.37%	
Fifth Third Bank	6672	OH	SM	State	1,366	86,907,025	3	80,008	5.31%	
New Carlisle Federal Savings Bank	29173	OH	SB	Federal	0	0	3	65,690	4.36%	
The Merchants National Bank	6606	OH	N	Federal	11	474,249	1	14,058	0.93%	
The Citizens National Bank of Bluffton	6531	OH	N	Federal	10	427,631	1	8,922	0.59%	
U.S. Bank National Association	6548	OH	N	Federal	3,132	220,658,297	1	5,095	0.34%	
Woodforest National Bank	23220	TX	N	Federal	767	3,200,314	1	911	0.06%	
Number of Institutions in the Market: 12					TOTALS	10,359	600,704,115	41	1,565,000	100.00

Table 15: CRA Ratings Chart for Springfield MSA Banks 2012
Source: FFIEC COMMUNITY REINVESTMENT Website

Bank	Location of Headquarters	CRA Rating	Year Evaluated
Park National Bank (Security National Bank)	Newark, OH	Satisfactory (Large Bank)	2010
Huntington National Bank	Columbus, OH	Satisfactory (Large Bank)	2007
PNC Bank, National Association	Wilmington, DE	Outstanding (Large bank)	2009
Key Bank	Cleveland, OH	Outstanding (Large Bank)	2009
Wesbanco	Wheeling, WV	Outstanding (Large Bank)	2010
Home City Federal Savings Bank of Springfield	Springfield, OH	Satisfactory (Small Bank)	2010
Fifth Third Bank	Cincinnati, OH	Satisfactory (Large Bank)	2009
New Carlisle Federal Savings Bank	New Carlisle, OH	Satisfactory (Small Bank)	2010
Merchants National Bank	Hillsboro, OH	Satisfactory (Intermediate Small Institution)	2008
Citizens National Bank of Bluffton	Bluffton, OH	Satisfactory (Intermediate Small Institution)	2011
U.S. Bank, National Association	Cincinnati, OH	Outstanding (Large Bank)	2008
Woodforest National Bank	Houston, TX	Needs to Improve (Large Bank)	2009

All of the FDIC-Insured institutions doing business in the Springfield MSA have maintained either a Satisfactory or Outstanding rating, except for Woodforest National Bank which received a Needs to Improve rating. Those banks with Outstanding ratings include Key Bank, PNC Bank, US Bank and Webanco.

B. HMDA data

TABLE 16: LOAN APPLICATIONS, ORIGINATIONS AND DENIALS BY RACE

Race	Year	Loan Apps.	% of Total	Loans Orig.	% of Total2	Apps. Denied	Denial Rate	% of Population
White	2006	9140	71.6	4256	85.2	2447	26.8	79
White	2010	4264	86.6	2556	90.2	1005	23.6	75.2
Black	2006	720	6.0	260	5.2	303	39.4	18.2
Black	2010	175	3.6	66	2.3	71	40.6	18.1
Hispanic	2006	102	0.8	40	0.8	33	32.4	1.2
Hispanic	2010	35	0.7	13	0.5	18	51.4	3.0

Geographer Devon Lenz examined HMDA data for Springfield and compared the 2006 data to the 2010 data. Table 12 displays his findings.

The table indicates that the number of loan applications made has dropped dramatically between 2006 and 2010. White applications dropped over 50%, as did Black applications. Hispanic applications dropped by 70%. In the same time period the percentage of loan applications taken from minorities dropped - from 6% to 3.6% for Blacks and from .8% for Hispanics to .7%. In both cases, significantly lower than their percentage of general population. Blacks account for 18% of the population, but only provided 3.6% of the loan applications. Hispanics account for 3% of the population, but only account for .7% of the loan applications.

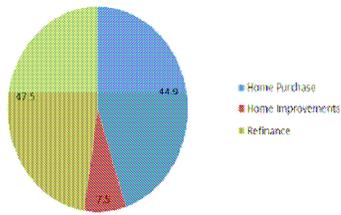
Denial rates are also much higher for minority applicants, than for the white applicants. During the time period, application denials dropped for White applicants from 26.8% to 23.6%, but increased slightly from 39.4% to 40.6% for Blacks, at almost twice the rate for Whites. And for Hispanics, the denial rate increased nearly 50% from 32.4% to 51.4%.

Lenz notes in his paper⁵: "while this doesn't look good, it doesn't necessarily mean discrimination is taking effect. One needs a rate that isolates race by holding income and credit score constant to be sure." He also notes that "Hispanics were denied about 20 percent more often, but this could be the random chance of a small sample: they only applied 35 times in 2010." He cautions, however: "High denial rates and low origination rates for minorities may be indicators of unfair housing practices."

Predatory Lending was a significant problem when the City completed its last Analysis of Impediments in 2008. However, now the after the housing market implosion, the bigger problem has been the decline in available credit. With tightening of standards for mortgage and a significant downturn economically, the number of people buying houses has declined. Lenz indicates that "Home purchase loans for the whole loan market are down from 2005, in favor of refinancing loans."

⁵ Devon Lenz. Fair Housing Paper. Wittenberg University, 2012, pp. 5-6.

2005



2010

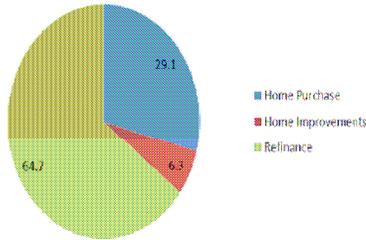


FIGURE 4: SPRINGFIELD MSA LOANS 2006-2010 Source: Lenz Fair Housing Paper

Figure 4 indicates that Home Purchase Loans have declined from 44.9% of the market to 29.1% of the market between 2006 and 2010. Likewise,

Refinance Loans have increased from 47.5% of the market to 64% of the market. Home improvement loans have declined slightly from 7.5% to 6.3%

C. Foreclosures

Foreclosures have continued to wreak havoc in the Springfield housing market, although indications are that the problem has begun to decline in the past two years. Total foreclosure filings in the Clark County Municipal Court were down from 1104 filings in 2009 to 1067 in 2010 and 881⁶ in 2011. See Table 17.

⁶ Supreme Court of Ohio Annual Report 2011: Court of Common Pleas/General Division, p. 51-54. <http://www.supremecourt.ohio.gov/Publications/annrep/11OCS/default.asp>

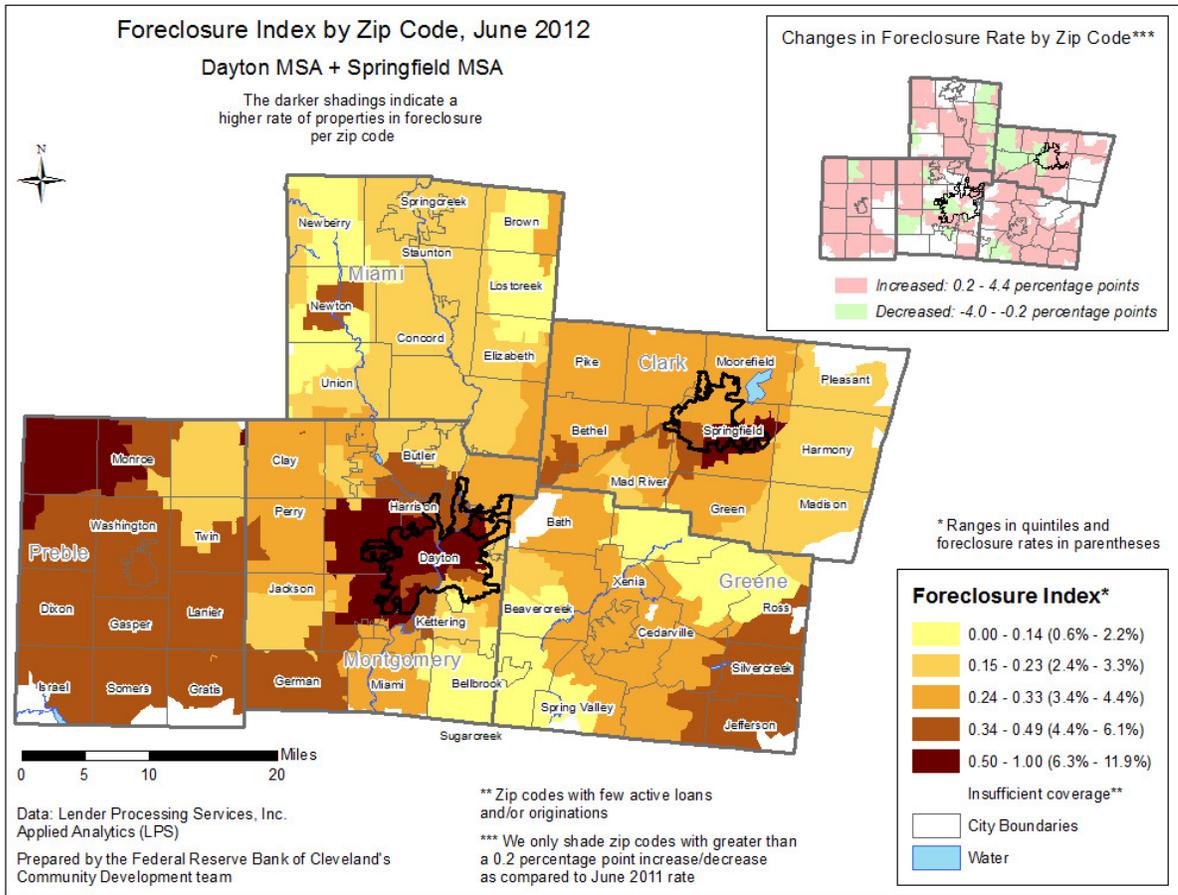
Table 17: Clark County New Foreclosure Filings and Default Judgments: 1997-2010.



Clark County Court of Common Pleas Foreclosure Caseloads and Terminations, 1997 through 2010								
Month	New Filings	Terminations				Terminations as % of Total		
		Default Judgments	Dismissals	All Others	Total Terminations	Default Judgments	Dismissals	All Others
1997	291	148	71	54	273	54%	26%	20%
1998	326	206	70	35	311	66%	23%	11%
1999	455	211	131	81	423	50%	31%	19%
2000	556	334	124	97	555	60%	22%	17%
2001	733	419	123	84	626	67%	20%	13%
2002	904	594	162	83	839	71%	19%	10%
2003	942	673	246	142	1,061	63%	23%	13%
2004	894	682	159	165	1,006	68%	16%	16%
2005	925	658	210	196	1,064	62%	20%	18%
2006	1,113	740	256	122	1,118	66%	23%	11%
2007	1,059	594	247	132	973	61%	25%	14%
2008	1,124	740	286	117	1,143	65%	25%	10%
2009	1,104	916	279	125	1,320	69%	21%	9%
2010	1,067	680	216	140	1,036	66%	21%	14%

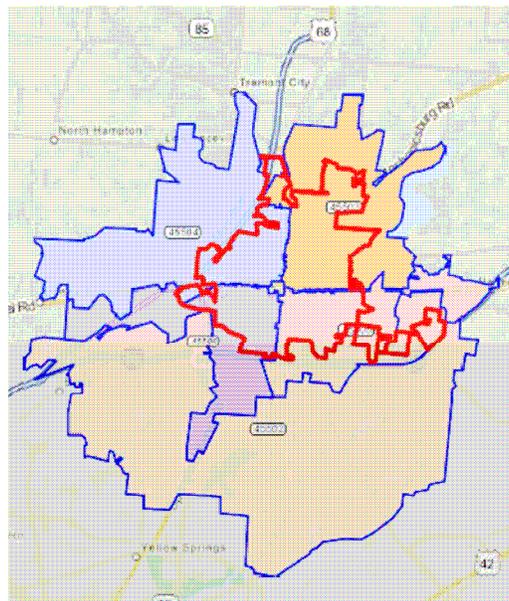
Source:
Supreme Court of
Ohio, 2010

MAP 7: Foreclosure Index by Zip Code, June 2012



MAP 8: SPRINGFIELD ZIP CODES

Source: <http://www.city-data.com/zipmaps/Springfield-Ohio.html>



Northwest quadrant:
Southwest quadrant:
Northeast quadrant:
Southeast quadrant:

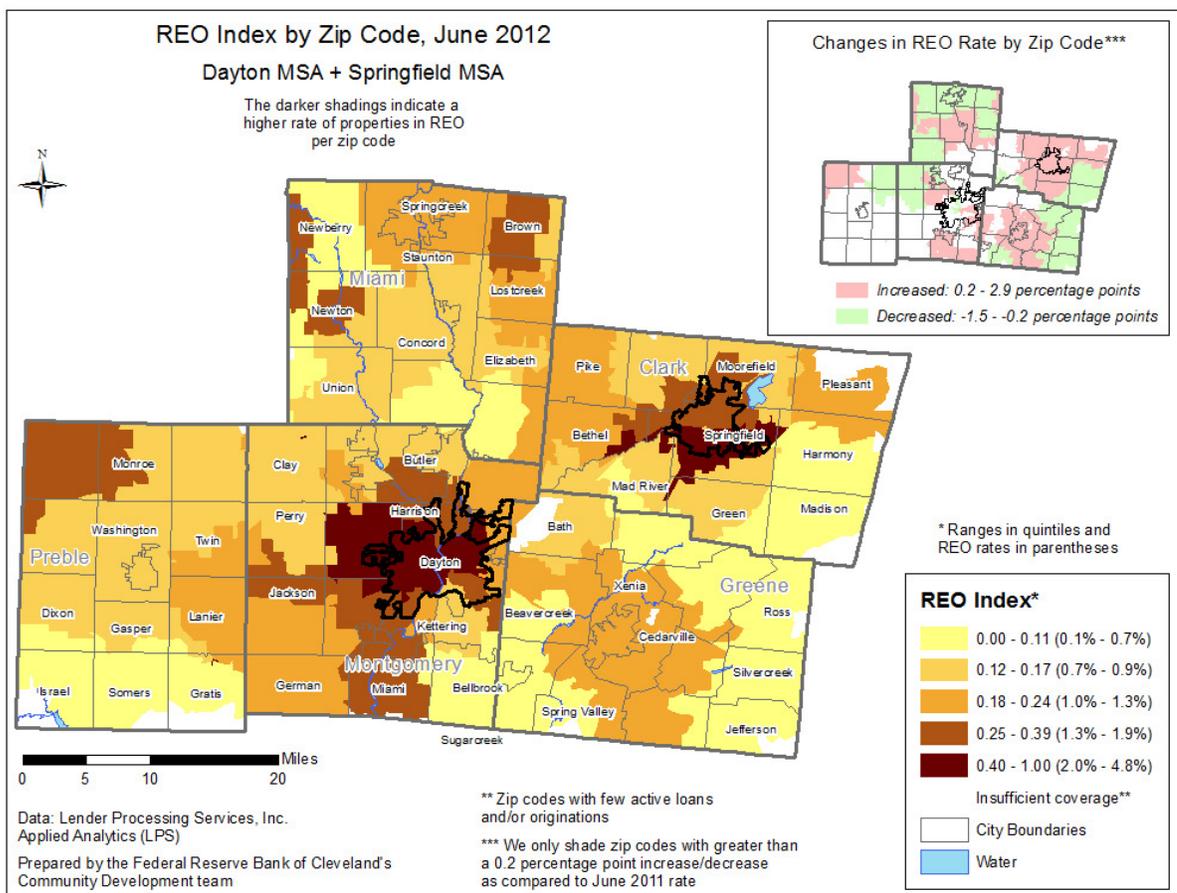
45504
45506
45503
45505

Recent analysis by the Federal Reserve Bank indicates that the foreclosure problem has impacted the entire city, although some areas are more pronounced. Map 7 shows that the foreclosure problem was the largest in the southeast quadrant with a foreclosure rate of 6.3-11.9%. The southwest was the area with the next highest percentage from 4.1-6.3%. The northern quadrants were both at 3.4-4.4% in foreclosure. This map also shows that the foreclosure rate declined slightly in the western quadrants, but increased slightly in the eastern quadrants in the past year.

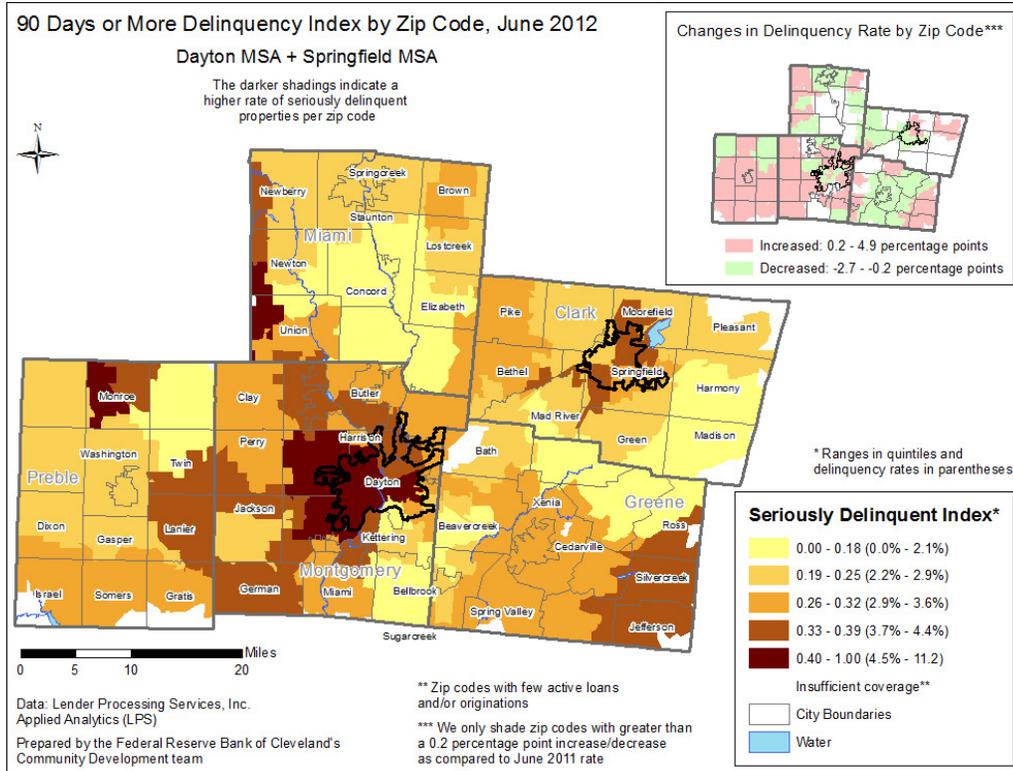
The Federal Reserve research also indicates that the number of Real Estate Owned (REO) properties have increased in all quadrants of the City in the past year, showing that the affect of foreclosure continues to plague the city. (See Map 8) The rate of REO is higher in the southern part of the City (2.0-4.8%), than the northern areas (1.3-1.9%).

And although the number of court cases has begun to decline, Map 9 indicates shows that there are still a considerable number of properties at risk for foreclosure in the near future, with 90 days or more delinquency. In this category the southwest and northeast quadrants have the most properties in serious delinquency with 4.5-11.1%. The southeast quadrant is next with 3.7-4.4% in such delinquency and the northwest, the least number with 2.9-3.6%.

MAP 9: REO PROPERTIES INDEX BY ZIP CODE, June 2012



MAP 10: 90 Days of More Delinquency by Zip Code, June 2012



Analysis: The foreclosure crisis has impacted the city for the past 15 years. Although the new foreclosure cases in Clark County courts have declined over the past two years, they still represent a considerable burden to the people of the City. Foreclosures are evident in all areas of town, the number of real estate owned properties has increased and the number of properties in danger of default is also a concern. Low income and minority areas have a larger share of these problems than other areas of town.

D. Lender Focus Group.

In the Focus Groups coordinated by Harper Mack Group, LLC, one group met with a group of lenders. Many of the lenders present indicated that they didn't know whether or not there was a problem with discrimination. They were one of the only groups that stated that they were not aware of anyone facing discrimination in sales, rental or other housing services; as well as in mortgage loan transactions. The only area they expressed a concern about fair housing discrimination was in racial steering.

E. Other Focus Groups

In the other focus groups, however most indicated that they are aware of a problem with fair housing discrimination. In fact, all of the other groups believe retaliation is a problem for those making complaints. Six out of nine groups were aware of someone experiencing housing discrimination. When the focus groups looked at lending issues, most (5/9) were aware of someone who believed they had been refused a mortgage loan when they could afford it. Some of the groups (4/9) reported knowing someone

being refused loan information and also knowing those who have had different loan terms, because of their protected class. There was also concern expressed about credit scoring and how that impacts many potential homebuyers in a negative way. For a more complete report, see the next section of this report.

Analysis

It is clear that the lending climate continues to be affected by the predatory lending situation, which helped cause the foreclosure problems. An economic downturn and tightening of credit has made it more difficult for people to purchase homes. Homeowners are still facing foreclosure due to these causes.

There continues to be a concern that minorities are not able to purchase homes at the same rate as the majority population. Whether this is because of discrimination in the initial application process, in the loan processing or due to person credit issues is not clear. The perception of many, as evidenced by the Focus Groups, is that there is discrimination against minorities during the loan process. In addition, the foreclosure problem although community wide, is more pronounced in those areas of the City with the highest minority population.

VIII Focus Groups

In the summer of 2012, the City of Springfield contracted with Harper Mack Group, LLC to conduct focus groups for the 2013 Fair Housing Analysis to gain citizen input on issues of fair housing. They met with ten different groups. The intent was to meet with groups representing the protected classes under the fair housing laws to determine fair housing problems related to renting, buying and getting a mortgage and to also glean suggestions for the City's actions to eliminate fair housing barriers. The groups in their study included: 1) Persons with disabilities, 2) Low Income Families with Children, 3) African-Americans, 4) Hispanics, 5) Realtors, 6) Disability Providers, 7) Housing Providers, 8) Lenders, 9) Government Officials and 10) Veteran's. Their process involved asking a series of general questions related to fair housing, as well as asking the persons to complete a short questionnaire with questions about housing discrimination.

The groups were held for ninety minutes each and met in community locations. The groups were diverse as regard to race, color, religion, national origin, sex, familial status and age as indicated by a survey of the participants. See a full summary of the groups in the Focus Group Report located in Appendix 7. Here we will summarize the response from the questions asked of the groups.

A majority (8/9 groups) believe there is discrimination in the following areas: 1) retaliation for reporting fair housing issues 2) discrimination for families with children under the age of 18, 3) false denials that housing is available, and 4) steering housing consumers into certain areas

A majority (6/9 groups) also said that they know someone who has been discriminated against in the conditions, terms of sale, rental, or services of facilities.

A majority (5/9 groups) said "Yes" either they or someone they know has been refused a mortgage loan when they could afford it.

The areas where there was not a majority indicating that participants knew someone who had experienced discrimination included situations with a pregnant female in the family and someone refused information regarding loans, although several groups did respond in the affirmative, which indicate there may be a problem.

More specific fair housing concerns expressed by focus group members in discussion were:

- Need for more education (expressed by all ten groups) in the following areas:
 - Fair housing laws (Persons with Disabilities, African Americans, Housing Authority, Landlords)
 - Housing Authority's level of decision making vs. state and federal decisions
 - Knowledge about affordable housing options
 - Tenants on resources available
- Credit scoring and/or loan issues were identified by seven of ten groups
- Lack of understanding of diverse cultures was identified as an impediment by five of the group. Cultures misunderstood especially were those with disabilities and Hispanics; as well as many landlords don't understand a lot about other cultures. Some don't want poor people in their neighborhoods. Some threatened by diversity
- Discrimination
 - Barriers for black veterans worse than others
 - Perception of racial divides across city neighborhoods
 - Landlords not wanting to rent to people with children, Latinos, disabled, mentally ill
 - Race discrimination for African-Americans continues, but more undercover; used to be more blatant
 - Requiring social security numbers of all residents
 - Some don't want to sell and rent to interracial or gay families, and Muslims
 - Some want same race Realtors
 - Landlords discriminating on the basis of sexual preference
 - Segregation of people with disabilities
 - Pressure sellers to keep the neighborhood white
 - Banks not lending in some areas of town
 - People use legitimate reasons to reject tenants, when they really are excluding them because of protected classes
- Some unwilling to file complaints because the odds of getting satisfaction is slim
- Persons with felony convictions have difficulty getting housing (noted by four groups)
- Gays aren't welcome because it's not in City Ordinance
- Poor, homeless, unemployed, minorities and those with felony convictions seen as undesirable
- Being poor is expensive because they have to pay high interest, high loan fees for mortgages, cars, furniture, credit, etc.
- The Latino Group also said that because many of them are not currently citizens they face additional challenges. They have to share social security numbers to get housing and work. Unless they marry an American, most can't buy a house.
- Substandard Housing was mentioned by seven of the ten groups.

- Needs for additional housing for Veterans, Persons with disabilities (accessible housing),
- Landlords identified as an "impediment" in six of the ten groups doing these things:
 - Lack of oversight of landlords
 - Absentee landlords not taking care of property
 - Taking advantage of Latinos because they know they won't complain
 - Not responding to needs for repairs
 - Made pregnant woman move out
 - Don't give a good reference if tenants complain
 - Take advantage of people with disabilities by charging extra
 - Don't take responsibility for their tenants
 - Landlords shut off water if they want tenants to move

In addition, the Consultant noted that people talked about despair as a result of impediments in eight of the ten groups. That the systemic problems lead to a sense of hopelessness as people give up, become homeless, feel invisible. There is an underclass of people who have difficult maintaining employment.

The Consultant also gave many recommendations for action, which will be taken into consideration in future fair housing planning.

Analysis: The focus group research indicates that people in our community still have many fair housing concerns. Many of their concerns go unreported, perhaps due in part to concern of retaliation. The groups indicated that many areas identified in earlier analyses of impediments are still a concern, and also added issues related to retaliation, familial status, absentee landlords, sexual preference, disability discrimination, need for assessable housing, lender red-lining, and discrimination against Muslims. They were also concerned about the problem with people with criminal backgrounds being denied housing and would like action toward that by the housing authority. Some problems identified were much bigger than fair housing, including immigration, veteran awareness of their benefits and a general sense of hopeless. There were suggestions for fair housing action that can be considered for future planning.

IX Fair Housing Testing

The City of Springfield maintains a contract with Miami Valley Fair Housing to conduct fair housing testing. They have conducted eight paired tests each year since 2008 testing for race, familial status, national origin and disability status discrimination. They conducted 14 tests on disability status, 12 on race, and 2 each for national origin and familial status. In 24 of these 32 matched test, no evidence of discrimination was found. In six cases for disability status, some discrimination was found, in relationship to reasonable accommodations for assistance animals. In addition there was one instance of race discrimination and one of familial status discrimination. See summary table of tests from 2008-2011 in Appendix 8. Copies of the test reports are maintained in the City of Springfield Community Development office.

Analysis: In the majority of cases, it appears that real estate professionals are "doing the right thing," and have knowledge of the fair housing laws. Especially in the area of race, there was only one instance out of 12 indicating a problem. In the area of

disability, however there seems to be more of a problem with 6/14 showing some evidence of discrimination.

X Fair Housing Complaints

A listing of fair housing complaints made from the City of Springfield in 2008-2012 with the U.S. Department of Housing and Urban Development (H.U.D.) was obtained from the H.U.D. office. This listing indicates that 29 complaints were made. These complaints were made on the basis of the following protected classes: Disability Status (17), Race (7), Familial Status, (5), Retaliation (5), Religion, (3) Sex (3), Color (1). The disposition of these cases is as follows. One disability case did not have proper jurisdiction. Three cases were withdrawn without resolution. This included one case based on disability, one based on familial status and retaliation and a third based on race, familial status and retaliation. Two of the disability cases were conciliated. One disability case was withdrawn after resolution. Ten cases were determined to have no cause. This included 6 disability cases, 4 race cases, 2 sex cases, 2 retaliation cases, and 1 familial status case. Cases where probable cause of discrimination was found were for 4 disability cases, 1 familial status, 1 religion and 1 case that involved, race, national origin, religion and color. 5 cases were still open at the time of the report.

Therefore there were two disability cases conciliated, one disability withdrawn after resolution, and 4 with probable cause. There was also one familial status found with probably cause. And then the other case with probable cause involved race, national origin, religion and color.

Analysis: The complaints filed indicate that there is a problem in the area of disability discrimination. In other areas, either there is less discrimination going on, or it remains unreported, but there was at least one case involving familial status, race, national origin, religion and color. The lack of complaints may also indicate lack of awareness of the fair housing rights and/or fear of retaliation.

XI Public Policies

A. Fair Housing Ordinance

The City of Springfield adopted a Fair Housing Ordinance in 1972. This ordinance has been amended several times. In 1982 amendments included the additions on the basis of sex, and in 1987 the amendment added the complaint process. The ordinance was modified in 1997 to make it substantially equivalent with State and Federal Fair Housing Laws. A copy of the most recent ordinance is attached as Appendix 9

B. Zoning Code

The City Zoning Code does not contain provisions that discriminate against persons of protected classes. In residential housing, the City follows the International Property Maintenance Code (2000) for existing structures. For new residential structures, the Ohio Residential Code (1999) is used for one to three units. For new commercial structures, which includes dwellings with more than three units, the City follows the Ohio Building Code (2000).

The City Zoning Codes delineate some areas of "single family only" residential

zones. Following the Zoning Code definitions, single family units are limited to five unrelated persons living under one roof. The City Planning office is aware of the need to make reasonable accommodations in zoning policies for those with handicap status and of state laws pertaining to group homes.

C. Affordable Housing Policy

In 1994, the City adopted an affordable housing policy to govern location of new developments within the City. The goal of this policy is to assure that new federally-funded low income housing developments are not located in areas of current low income concentrations, unless requested by the neighborhood. A copy of this policy is in Appendix 10.

D. Affirmative Marketing Plan

The City of Springfield has adopted an affirmative marketing plan for its housing programs. (See Appendix 11). This plan was last updated in April, 2001. In addition, housing rehabilitation loan programs follow fair housing advertising guidelines and advertise broadly through a variety of channels, including neighborhood organizations, the media, community organizations and churches to make information available to all persons within the City. The Department also maintains a TTY telephone line for the hearing impaired.

E. Urban revitalization

The City of Springfield is working diligently to pursue all paths toward urban revitalization. The City Commission's goals indicate work in the area of economic development and housing revitalization. Following is a summary of some of the current efforts:

1. Economic Development

The City has taken an aggressive approach to encourage economic development. Goals include retaining existing businesses and encouraging their expansion, as well as attracting new businesses. Marketing material has been developed to promote the City to potential investors and businesses. The brownfield sites have been inventoried and strategies for redevelopment are being considered. The City has also worked in conjunction with the Clark County Chamber of Commerce to adopt a bold vision for the community, entitled: Vision 2020. This plan works to build regional economic development in the community and addresses related issues of education, transportation, minority business and urban revitalization. The development of industrial parks has been a component of this plan, with the NextEdge Industrial Park now open to new and existing businesses.

2. Housing Rehabilitation

The City is aggressively pursuing rehabilitation of existing housing in the City, leveraging federal monies available through HOME and other sources. Currently, deferred housing loans are available through the City for owner-occupied housing repairs to low income senior citizens and disabled persons

The City helped develop and now partners with the Neighborhood Housing Partnership of Greater Springfield (NHP) to work with the community to spur rehabilitation efforts. This organization is a Neighbor Works Community Development Agency. NHP is also supported by the lending community, private foundations, City and Federal sources. NHP administers several housing rehab programs and provides homebuyer education, foreclosure prevention counseling and catch up loans, financial education and credit counseling.

The City has just completed two Neighborhood Stabilization Grants, focusing on several neighborhoods to stabilize housing inventory.

3. Neighborhood Development

Along with its economic and housing efforts, the City Commission has made neighborhood development a priority for several years. The Community Development Block Grant monies are channeled toward neighborhood-related efforts. A staff person was hired in 1992 to assist community organizations. The Council of Neighborhood Associations had 12 active neighborhood organizations in 1995. There are currently 27 organizations. The neighborhood organizations are addressing issues of concern in the neighborhoods and the City works to support efforts brought forth by associations.

F. Provisions for the homeless

The City has worked with homeless providers in the community to develop a Housing Coalition. This group makes decisions for the City on distribution of monies for the homeless and is also working to develop coordinated efforts and continuing care for those utilizing homeless services. The group has hired a consultant and is applying for additional funding through the Continuum of Care to address the special needs community as well as the homeless housing needs.

G. Housing Market Analysis

In 2001, the City of Springfield contracted with Wittenberg University to conduct a Housing Market Analysis. A copy of this analysis is attached (Appendix 12). Current city plans incorporate strategies identified in this analysis which include efforts to target transitional areas for housing rehabilitation, demolish blighted housing, enhance Code Enforcement, expand tax credit projects for new housing opportunities, develop a green space policy and improve the city corridors are components of the plan.

There is a need for an updated Housing Market Analysis.

H. Lead-Safe Springfield

In 2001, the City of Springfield updated their Fair Housing Analysis to include the concern of Lead-based paint. Because many of the houses in the City were built prior to 1978, the presence of lead-based paint is prevalent in the City.

Lead-Based Paint Overview

With an aged housing stock, it can be expected that a significant number of units in the City of Springfield will have lead-based paint, an environmental concern particularly in

households with children 6 years of age and younger. Lead paint is typically found in homes that were constructed prior to 1978. According to the U.S. Census 2005-2007 American Community Survey estimates, approximately 87% of the housing stock in the City of Springfield was constructed prior to 1980 and is thus at risk for various lead-paint hazards.

Estimated Number of Housing Units Containing Lead-Based Paint

The following table provides an estimate on the number of housing units that contain lead paint hazards in the City of Springfield.

TABLE 18: ESTIMATED NUMBER OF HOUSING UNITS THAT POTENTIALLY CONTAIN LEAD-BASED PAINT

Construction Year	Housing Units	Housing Units with Lead-Based Paint	
		Units	Percent
1960-1979	6,584	4,082	62%
1940-1959	9,295	7,436	80%
Pre-1940	10,771	9,694	90%
Total	29,309	21,212	72%

Source: U.S. Census Bureau

In addition to estimating the total number of housing units that may contain lead-based paint in the City of Springfield, it is also possible to estimate the number of housing units that potentially contain lead-based paint hazards and are occupied by lower income households. The following table shows the number of housing units occupied by extremely low income, very low income, and low income households that may contain lead-based paint.

TABLE 19: ESTIMATED NUMBER OF HOUSING UNITS THAT POTENTIALLY CONTAIN LEAD-BASED PAINT BY INCOME CATEGORY

Housing Units by Affordability	Total Occupied Units
0-<30% of MFI	
Occupied Units	2,798
Built Prior to 1970	1,911
Estimated # of Units w/ Lead-Based Paint	1,433
30-<50% of MFI	
Occupied Units	14,468
Built Prior to 1970	12,969
Estimated # of Units w/ Lead-Based Paint	9,727
50-<80% of MFI	
Occupied Units	6,399
Built Prior to 1970	4,902
Estimated # of Units w/ Lead-Based Paint	3,676

Source: U.S. Census Bureau; U.S. Dept. of HUD CHAS Data

0%-<30% of MFI:

Of the 2,798 housing units occupied by households below 30% of MFI, 1,911 were built prior to 1970. Of these, 1,433 (75%) are estimated to contain lead-based paint.

30%—<50% MFI:

Of the 14,468 housing units occupied by households between 30% and 50% of MFI, 12,969 were built prior to 1970. Of these, 9,727 (75%) are estimated to contain lead-based paint.

50%—<80% MFI:

Of the 6,399 housing units occupied by households between 50% and 80% of MFI, 4,902 were built prior to 1970. Of these, 3,676 (75%) are estimated to contain lead-based paint.

Lead-Based Paint Testing

According to the U.S. Census 2005-2007 American Community Survey estimates, there are 15,175 children in Springfield under the age of 18 years. Of these, 5,371 children are age 6 and under (35.4% of total children).

Recent testing revealed the following:

- 3,429 children age 6 and under (64% of this age group) were tested in 2007 by the Ohio Department of Health for lead paint hazards.
- 96 children had a blood lead level of 10 ug/dL or higher.
- Of the 96 children cited above, six had a blood lead level of 25 ug/dL or higher.
- Using those found with an elevated blood lead level (EBL) of 10 or greater and dividing by total children tested, testing shows an EBL of 10 or greater in about 2.8% of the children age 6 and under in Springfield.
- Using that percentage, it is estimated there is a total of 150 children age 6 and under with an EBL of 10 ug/dL or greater. Only 96 of these have been identified, so there are still approximately 54 children age 6 and under with an unidentified EBL.

**TABLE 20: 2007 LEAD-BASED PAINT HAZARD TESTING RESULTS
CITY OF SPRINGFIELD AND CLARK COUNTY, OHIO**

	Total Children Screened (0-72 months)	Under 10 ug/dL	10-14 ug/dL	15-19 ug/dL	20-24 ug/dL	25 ug/dL and over	Total EBLs
City of Springfield	3,429	3,333	68	15	7	6	96
Clark County	4,186	4,085	72	15	8	6	101

Source: City of Springfield: Five Year Strategic Plan

The City has continued to apply for available funding through the U.S. Department of Housing and Urban Development to address the lead-based paint problem. The Lead-Safe Springfield (LSS) program has been the recipient of six (6) consecutive HUD Office of Healthy Homes and Lead Hazard Control, Lead Hazard Control grants totaling \$17,500,000. The goal of the program is to make lead-safe housing for young children and to provide lead skills training and outreach activities.

Analysis: The City of Springfield is working hard with fewer resources to continue to address problems common to older urban communities. They take the lead in pushing for economic development, neighborhood revitalization, care for the homeless, and homeless prevention. They strive to have exemplary policies to provide equal housing opportunity, demonstrated by their affirmative marketing policy, their fair housing ordinance, their affordable housing policy, their nonrestrictive zoning code. They have also aggressively addressed the problem of lead-based paint through six grants with HUD.

XII City of Springfield Actions

During the reporting period, the City of Springfield Fair Housing Office has maintained an active presence in the City promoting equal opportunity in housing. The Fair Housing/Mediation Coordinator had addressed fair housing issues 60% of her time. She has addressed the impediments identified in the 2008 Analysis of Impediments to Fair Housing in her annual plans. See attached General Performance Reports for 2008-20011 (Appendix 13).

To what extent have impediments to fair housing been eliminated? Progress has been made, especially in promoting homeownership to minorities, providing fair housing training for Realtors and property managers and providing fair housing education to consumers. Gross discrimination is not occurring on a wide scale, evidenced by relatively few incidents of reporting. However, many previously identified impediments continue to be a problem. Predatory lending has been replaced with foreclosure scams. While strides have been made in organizing around issues of foreclosure, the problem resides in market forces beyond the control of the fair housing office.

XIII Impediments to Fair Housing in Springfield.

Impediment/Concern #1: Racial Segregation/Racial Steering

There are reports that real estate agents are not always suggesting houses in all areas of Springfield to prospective homebuyers (Racial Steering).

There continues to be a problem with racial segregation in the City of Springfield, although the situation has been improving, but there is still a disproportionate concentration of both the African-American and Latino minorities in several census tracts.

Impediment/Concern #2: Discrimination against the Latino population.

From reports by the Latinos, by Realtors and other community members there seems to be a problem with housing discrimination against Latinos.

Impediment/Concern #3: Discrimination against persons with disabilities

From testing reports by Miami Valley Fair Housing, the percentage of fair housing complaints filed related to disabilities and reports of people with disabilities and persons who work with people with disabilities, there are some problems with discrimination against persons with disabilities. Another concern is adequate accessible housing.

Impediment/Concern #4: Discrimination against African-Americans

Focus groups report that African-Americans face housing discrimination in Springfield.

Impediment/Concern #5: Discrimination against Families with Children.

Focus groups report that some landlords seek to avoid renting to families with children.

Impediment/Concern #6: Substandard Renter-Occupied Housing

With the aging housing stock, there continues to be a large number of substandard rental units, especially in low income areas that are more concentrated with families with children and minorities. In focus groups with the community, there was a strong agreement that this continues to be a problem. Realtors and Lenders also mentioned the problem in focus groups.

Impediment/Concern #7: Those in the protected classes under the fair housing law are often part of lower income groups and have more difficulty qualifying for loans. Even some minorities in higher income groups are denied loans at higher rates than non-minorities. A smaller number of loans go to the minority populations in relation to their percentage in total population. Reliance on credit scoring also is causing problems for minorities and other low income people..

Impediment/Concern #8: There is a high rate of foreclosures in the City of Springfield, especially in minority areas.

Research indicates that the foreclosure rate is widespread, and also concentrated in minority areas. Although the number of foreclosures are in decline, it is still a substantial problem.

Impediment/Concern #9: There is a need for more fair housing education for both consumers and housing providers.

In Focus Groups, many people indicated that there is a need for fair housing education for members of protected classes, as well as for housing providers.

Impediment #10: Children under the age of 6, and minority children are at risk for lead-based paint exposure in the City of Springfield, particularly in the southwest quadrant and in other areas where the aged housing stock is deteriorating. This is a fair housing concern for families with children and minorities.

There has been progress made in this area, but it is still a concern, due to the aging house stock in the City of Springfield.

Impediment #11: Retaliation

In nine of ten focus groups, the participants expressed a concern that people face retaliation when they make fair housing complaints.

Impediment #12 Veterans Concerns

Veteran's Status was recently added to the Ohio fair housing law. In the Veteran's Focus Group, it appears that veterans are often not aware of benefits available to them and their fair rights. Many face discrimination because of their other protected class status, especially disability status and race.

Impediment #13 LGBT Discrimination

According to Focus Group reports, there are problems with housing discrimination for the Lesbian, Gay, Bi-Sexual and Transgender population in Springfield. Although this is not a protected class in the local, state or federal fair housing laws, it is protected in all U.S. Department of Housing and Urban Development funded programs, which includes the city housing programs and all subsidized housing in the city.