



ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING

City of Springfield 2018

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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 2013. It has been implementing actions to address those impediments for the past five years. This report seeks to update the 2013 report with developments in 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 2012-2017 and involves a variety of measures, including statistical analysis of HMDA data, a self-report survey by local real estate persons, analysis of census data, including some HUD AFFH tables and maps and information from housing providers in the community. We also rely on the information gathered from the previous Analysis of Impediments in which we did a lending analysis and focus group study. We have updated the focus group report and included listening projects our Human Relations Board has conducted.

The City of Springfield conducted this analysis with 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 City also contracted with HarperMack Inc. to conduct focus groups. The U.S. Department of Housing and Urban Development and the Ohio Civil Rights Commission 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 (2013-2017) in order to identify barriers to fair housing and develop a plan to overcome these barriers.

Demographic Summary of the protected classes

In 2016, the Community Survey census update reports that 59,087 people live in the City of Springfield. There were 31,592 females (52.6%) and 28,415 males (47.4%). Racially, the majority of persons in Springfield are White (44,799 or 75.2%), with the Black population being the second largest racial group (10,729 or 18.1%). 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 3.1% with 1862 total residents in 2015. In 2016, 24% (14,272) of the population was under the age of 18, which is up by six percent from 2000, although the population under the age of 5 has decreased. 11% of younger adult population (ages 18-64) have cognitive or ambulatory difficulties, with fewer disabled in the under 18 (1.41%) and over 65 age categories (6.5%). Within publicly supported population, however, 19-24% of the population reports disabilities.

The 2016 Community Survey reports that since the 2010 census, a shift has occurred. The majority of houses are now renter-occupied (52.8%), with 47.2% owner-occupied units. 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.

Military Status is included in 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. Our research indicates that the City is very gradually becoming more integrated. Black population density maps show that the Black population became more dispersed throughout the City between 1990 and 2016. Statistical analysis conducted by Geographer Devon Lenz in this report discusses this trend and how 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 4). 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 7,522 of our low-income residents experience a housing cost burden, paying over 30% of their income for housing. This cost burden is shared across ethnic lines, but because minorities are disproportionately represented in lower income categories, they have a slightly higher cost burden. In the past two years, property values have begun to rise again in the city of Springfield as a whole, but have not increased in the southwest quadrant, areas of highest minority population.

Public Housing

The Springfield Metropolitan Housing Authority reports they affirmatively further fair housing and have a policy on reasonable accommodations and modification. They state they do not have any fair housing problems at this time and their last HUD fair housing review showed no problems. They educate their residents about their fair housing rights, require their staff to attend fair housing training and they work hard to encourage their housing choice voucher holders to locate in higher income areas, although barriers include lack of properties available in these areas, due to landlord choice. A review of demographics of public housing sites indicates that most properties are well integrated, with the exception of Lincoln Park (with more minorities than general population) and the project-based Section 8 projects that are skewed in terms of high racial minority population (Tubman Towers and Opportunity Gardens) and low racial minority population (Springfield Towers). The housing authority 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. Areas of concern noted by both Realtors and consumers are: steering, race (African-American and Hispanic) discrimination, retaliation for filing a fair housing complaint, familial and disability status discrimination and discrimination against LGBT 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 continue provide specific training on areas where the fair housing law is being violated, so that they can attend to these problems

Lending Community

In the past five years, our lending situation reached a low in terms of home sales and lending, but now is starting to improve. The foreclosure problem is also improving although the foreclosure rate is still at twice what it was before the problem began. 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's 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

Focus Groups

The city engaged in three community engagement processes as part of this analysis. The Human Relations Board conducted a survey at CultureFest and Community Forums. The city worked with the Fair Housing Advocates in a process to engage tenants, landlords and organizations who work with both in a series of facilitated sessions with an eye to solutions. And finally, the City contracted with Harper Mack Group to conduct eight focus groups with the community to provide an inside look at fair housing issues. These processes suggest that race issues and housing discrimination concerns linger. A need for more education and addressing substandard rental housing are highlights. 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. Most violations were seen in the disability area of the law, specifically related to assistance animals and one design case. National origin and race were concerns, but not positively identified.

Fair Housing Complaints

Fair Housing Complaints made with the Ohio Civil Rights Commission and the U.S. Department of Housing and Urban Development during the time of this report were analyzed. Of 36 cases closed, only 15 were settled, and the others dismissed or had a ruling of no probable cause. The disability cases were more likely to be settled with benefits. In other areas, either there is less discrimination going on, or it remains unreported, but there was at least one case settled including an issue 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 past grants with HUD. The City's Consolidated Plan incorporates efforts to target transitional areas for housing rehabilitation, demolish blighted housing, and enhance Code Enforcement.

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

The 2013 Analysis of Impediments relied primarily on data from the 2010 census, and for comparison purposes, data from previous decennial census. In this analysis, we include the decennial census data, and also the data from the 2015 or 2016 Community Survey when available, to update the information. We will also include some of the AFFH maps and data tables provided by HUD in the analysis.

A. General Statistics

At the time of the 2000 Census, there were 65,358 persons living in the City of Springfield, included in the 144,742 living in Clark County. (Table 1) 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 were 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.

In the past six years, population decline slowed, but continued. It is notable that the trend seems to indicate now the population decline in the County outside the City limits (-2028) for the first time surpassed the City's decline (-1519). (See Table 2), In 2010, the City had lost 14% of its population in the past 20 years, although the County, outside the City limits had remained relatively stable, losing only .9% of their population. Based on 2016 estimates, the City has now lost 16% of its population since 1990, and the County, outside the City limits has lost 1.8% of its population

The City of Springfield could be categorized as a shrinking city. Since 1970, Springfield has lost over 20,000 people or 28% of their population.

TABLE 1: TOTAL POPULATION, SPRINGFIELD/CLARK COUNTY

TOTAL POPULATION	1990	2000	2010	2016
CLARK COUNTY	147,548	144,742	138,333	134,786
CITY OF SPRINGFIELD	70,487	65,358	60,606	59,087
COUNTY (OUTSIDE CITY)	77,061	79,384	77,727	75,699

TABLE 2: DECLINE IN POPULATION, SPRINGFIELD/CLARK COUNTY

TOTAL POPULATION	DECLINE(%) 2000-2010	DECLINE (%) 1990-2010	DECLINE (%) 2010-2016	DECLINE 1990-2016
CLARK COUNTY	6,409 (4.4%)	9,215 (6.2%)	3547 (2.6%)	12,762 (8.6%)
CITY OF SPRINGFIELD	4,752 (7.3%)	9,881 (14.0%)	1519(2.5%)	11,400 (16.2%)
COUNTY (OUTSIDE CITY)	1,657 (2.1%)	+2323 (2.9%)	2,028 (2.6%)	1362 (1.8%)

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 4) The 2015 Community Survey for the City shows that there was a slight decrease in the number of males and females, while the percentage of females has increased slightly in the city by .2%. (Table 3)

TABLE 3: GENDER CHARACTERISTICS: SPRINGFIELD AND CLARK COUNTY

	MALES				FEMALES			
	1990	2000	2010	2016	1990	2000	2010	2016
TOTAL COUNTY	70,705 (47.92)	69,569 (48.1)	66,989 (48.4)	66,217 (48.4)	76,843 (52.08)	75,173 (51.9)	71,344 (51.6)	70,610 (51.6)
CITY OF SPRINGFIELD	32,841 (46.59)	30,826 (47.2)	28,865 (47.6)	28,415 (47.4)	37,646 (53.41)	34,532 (52.8)	32,743 (52.4)	31,592 (52.6)

C. Race

At the time of the 2010 census, the majority of persons in Springfield were White (45,607 or 75%), with the Black population being the second largest racial group (10,981 or 18%). However, there were a growing number of Hispanics, accounting for 3% or 1824 of the City population. The percentage of Blacks in the City was down 1.5% from 2000. In terms of actual numbers, the City lost 5,294 Whites and 1800 Blacks in population, gaining 1054 Hispanics since the 2000 census. 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.

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.

TABLE 4: SPRINGFIELD/CLARK COUNTY 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)

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, adding 2015 Community Survey estimates.

TABLE 5: NEW RACE STATISTICS

	Clark County 2000		Clark County 2010		Clark County 2015		City of Springfield 2000		City of Springfield 2010		City of Springfield 2015		USA 2010	
	Number	%				%	Number	%			Number	%	%	
One race	142,456.00	98.40	134,824.00	97.50	132,620	96.9	63,962.00	97.90	63,962.00	97.90	57,007	95.0	0.98	
White	127,541.00	88.10	119,440.00	86.30	118,001	86.2	51,007.00	78.00	45,607.00	75.20	44,799	74.7	0.75	
Black or African American	12,954.00	8.90	12,128.00	8.80	11,648	86.2	11,909.00	18.20	10,981.00	18.10	10,729	17.9	0.12	
American Indian and Alaska Native	402.00	0.30	351.00	0.30	273	.2	223.00	0.30	201.00	0.30	63	.1	0.01	
Asian	761.00	0.50	858.00	0.60	991	.7	455.00	0.70	455.00	0.80	382	.6	0.04	
Native Hawaiian and Other Pacific Islander	31.00	0.00	51.00	0.00	70	.1	14.00	0.00	25.00	0.00	5	0	0.00	
Some other race	767.00	0.50	2,325.00	1.70	1637	1.2	354.00	0.50	1,131.00	1.90	1029	1.7	0.06	
Two or more races	2,286.00	1.60	3,509.00	2.50	4207	3.1	1,396.00	2.10	2,404.00	4.00	3000	5.0	0.02	
Hispanic or Latino (of any race)	1,699.00	1.20	3,805.00	2.80	4113	3.0	770.00	1.20	1,824.00	3.00	1862	3.1	0.13	

The 2015 Community Survey shows very slight changes since the last census. However, almost 600 more people now reporting two or more races, one percent more than in 2010. There are .5% fewer whites and .3% fewer blacks, while .1 % more Hispanics. So the majority population is now at 74.7 %, a decline of over 3% since 2000, and very similar to the USA average of 75%.

D. Familial Status

At the time of the 2010 census in the City of Springfield 24.4% of the population was under the age of 18. In Clark County, 30.9% of the population was under 18. Both the City and County had a higher percentage of children in 2010 than they did in 1990 and 2000, although the percentage of children under the age of 5 had not increased significantly. There is a slight decline in the percentage of children from 2010 to 2016.

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

	Under 5		Under 5		Under 18		Under 18	
	1990	2000	2010	2016	1990	2000	2010	2016
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)	4,189 (7.0)	14,103 (20.01)	11792 (18)	14,775 (24.4)	14,272 (23.99)
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

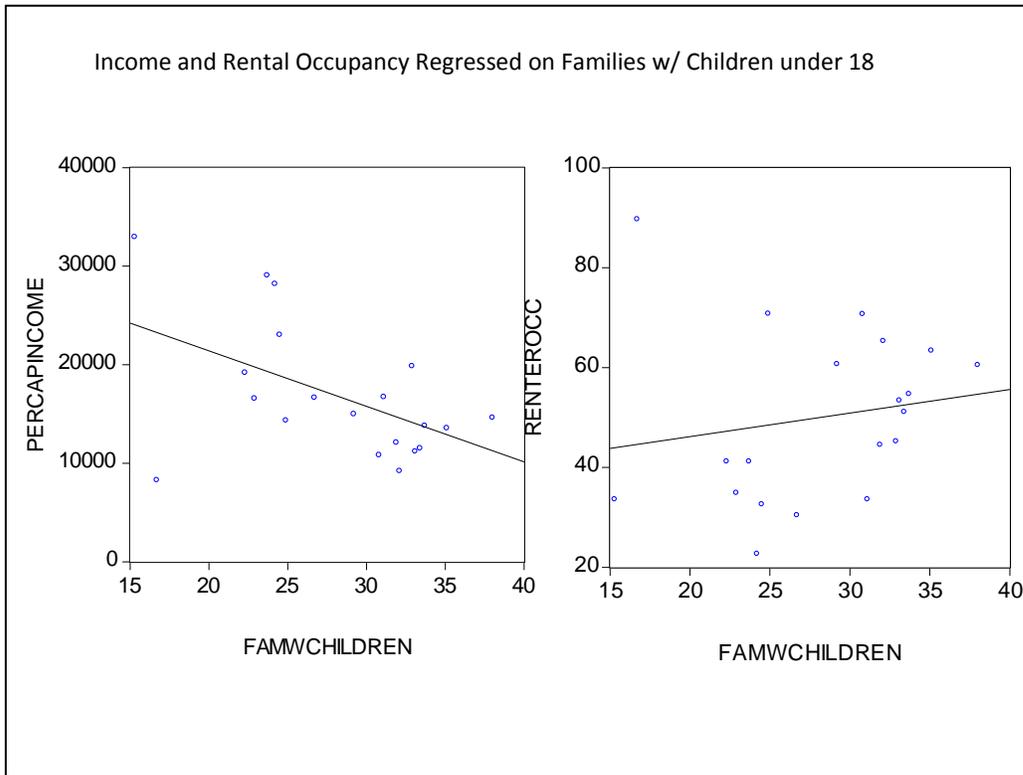


TABLE 7: CITY OF SPRINGFIELD DISABILITY STATISTICS
 Source: 2009-2011 American Community Survey

	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%	6	138	2659	4.50%
Vision Difficulty	0	108	1.11%	1540	4.20%		462	2110	3.57%
Cognitive Difficulty	0	735	7.53%	3284	8.95%	4	100	5023	11.24%
Ambulatory Difficulty	0	29	0.30%	4035	11.00%	4	257	6638	11.24%
Self-Care Difficulty	0	75	0.77%	1286	3.51%		952	2313	3.91%
Independent Living Difficulty	0			3015	8.22%	7	173	4752	8.04%
Total Population	0	431		9	3667	4	833	3	5908

E. Disability Status

In the AFFH tables, based on the American Community Survey (2009-2013), of the population over the age of 5 in the Springfield CDBG jurisdiction, the percentage of people with different types of disabilities varies from a low of self care difficulty (3.87%

of the population) to 11.02 % of ambulatory difficulties. See HUD table below. The numbers are similar in the Springfield region, with just 1-2% difference.

TABLE 8: TYPES OF DISABILITY (AFFH TABLE)

		(Springfield, OH CDBG, HOME, ESG) Jurisdiction		(Springfield, OH) Region	
Disability Type	#	%	#	%	%
Hearing difficulty	2,534	4.65%	5,993	4.71%	
Vision difficulty	2,088	3.83%	3,786	2.97%	
Cognitive difficulty	4,603	8.44%	8,779	6.89%	
Ambulatory difficulty	6,006	11.02%	11,970	9.40%	
Self-care difficulty	2,111	3.87%	4,383	3.44%	
Independent living difficulty	4,331	7.94%	8,095	6.36%	

Note 1: All % represent a share of the total population within the jurisdiction or region.

Note 2: Data Sources: American Community Survey (ACS), 2009-2013, based on total population 5 years and older.

In terms of disabilities by age group, for persons over the age of 5 in the CDBG jurisdiction, the highest percentage of people with disabilities is in the range of 18-64 year olds at 11.7%. Then those over 65 report 6.23% with disability, and 1.79% of the young people ages 5-17. The numbers are similar in the Springfield region.

Table 9 – DISABILITY BY AGE GROUP

		(Springfield, OH CDBG, HOME, ESG) Jurisdiction		(Springfield, OH) Region	
Age of People with Disabilities	#	%	#	%	%
age 5-17 with Disabilities	974	1.79%	1,792	1.41%	
age 18-64 with Disabilities	6,378	11.70%	12,266	9.63%	
age 65+ with Disabilities	3,398	6.23%	8,275	6.50%	

Note 1: All % represent a share of the total population within the jurisdiction or region.

Note 2: Data Sources: American Community Survey (ACS), 2009-2013, based on total population 5 years and older.

Table 10 – DISABILITY BY PUBLICLY SUPPORTED HOUSING PROGRAM CATEGORY

(Springfield, OH CDBG, HOME, ESG) Jurisdiction		People with a Disability	
	#	%	
Public Housing	154	25.16%	
Project-Based Section 8	150	21.10%	
Other Multifamily	0	0.00%	
HCV Program	175	19.21%	
(Springfield, OH) Region			
Public Housing	154	25.16%	
Project-Based Section 8	150	21.10%	
Other Multifamily	0	0.00%	
HCV Program	200	19.76%	

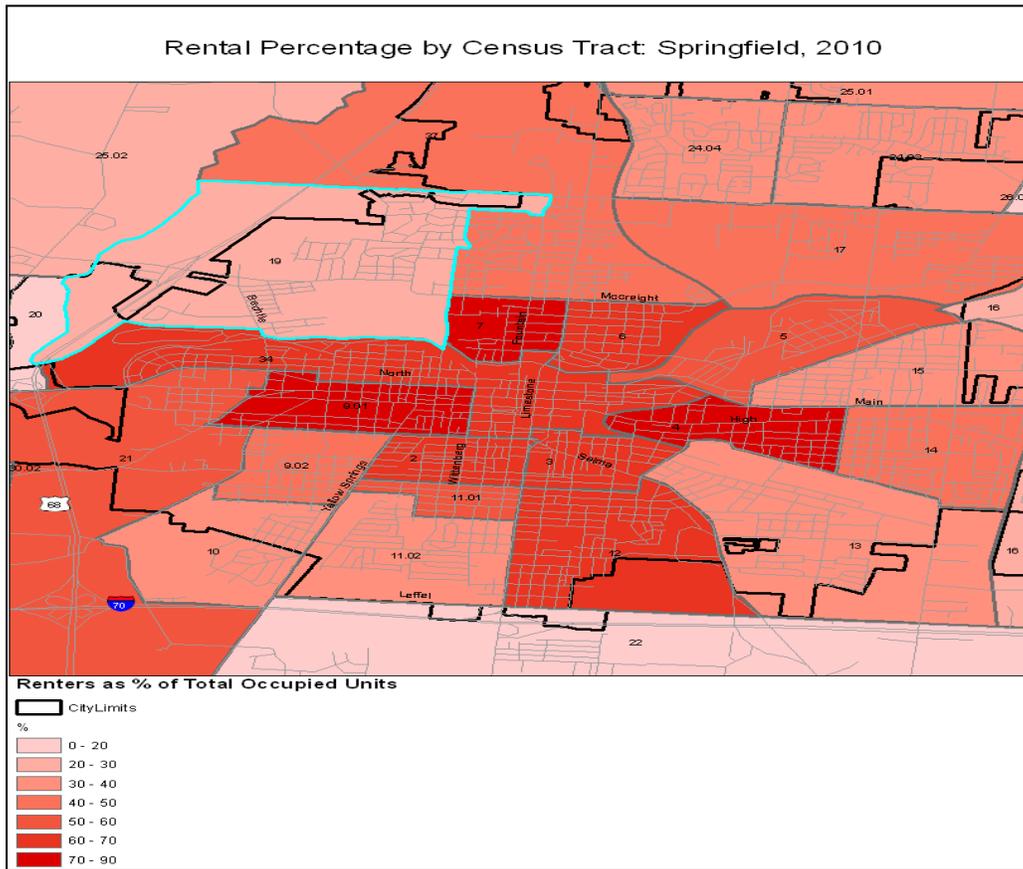
In publicly supported Housing Programs, the population of disabled is much higher than in the general population. Here, those with disabilities range from 19.21% of the Housing Choice Voucher population to 25.16% of the Public Housing population. 21.10% of those in Project-Based Section 8 report some disability.

Analysis: Although the number of people with disabilities is fairly low, this is a consideration for property managers and Realtors. They need to be well-versed on the fair housing law to help housing consumers receive equal treatment and provide and/or permit reasonable accommodations and modifications when needed.

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



In the 2016 Community Survey, the percentage of renter-occupied housing units has now shifted to 52.8%, with 47.2% owner-occupied units, a large shift in the past six years.

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. Military Status

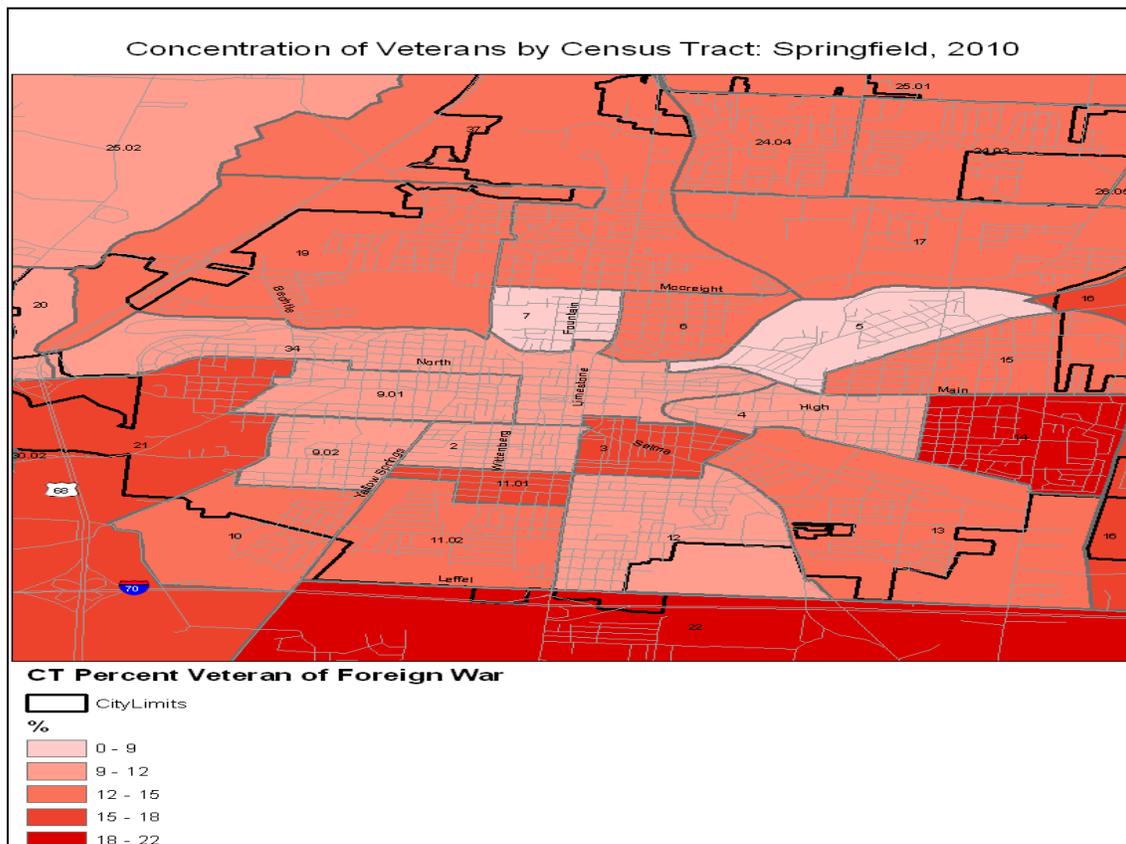
The State of Ohio has added Military Status to protected classes under the fair housing law. The 2009-2011 Community Survey estimates there are 5,434 veterans living in Springfield, Ohio. Among the adult population of 46,398, this represents 12% of the City's population. Table 8 indicates that the median 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 11: 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	+/-4,035	20,439	+/-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 recent past are the Hispanics. 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. In the 2015 American Community Survey, this is now up to 1862, or 3.1%.

With regard to disabilities, 11.24% in the City have ambulatory difficulties; with 30% of the population over 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. Also, 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 16% of its population since 1990. This is due in large part to loss of jobs in the region.

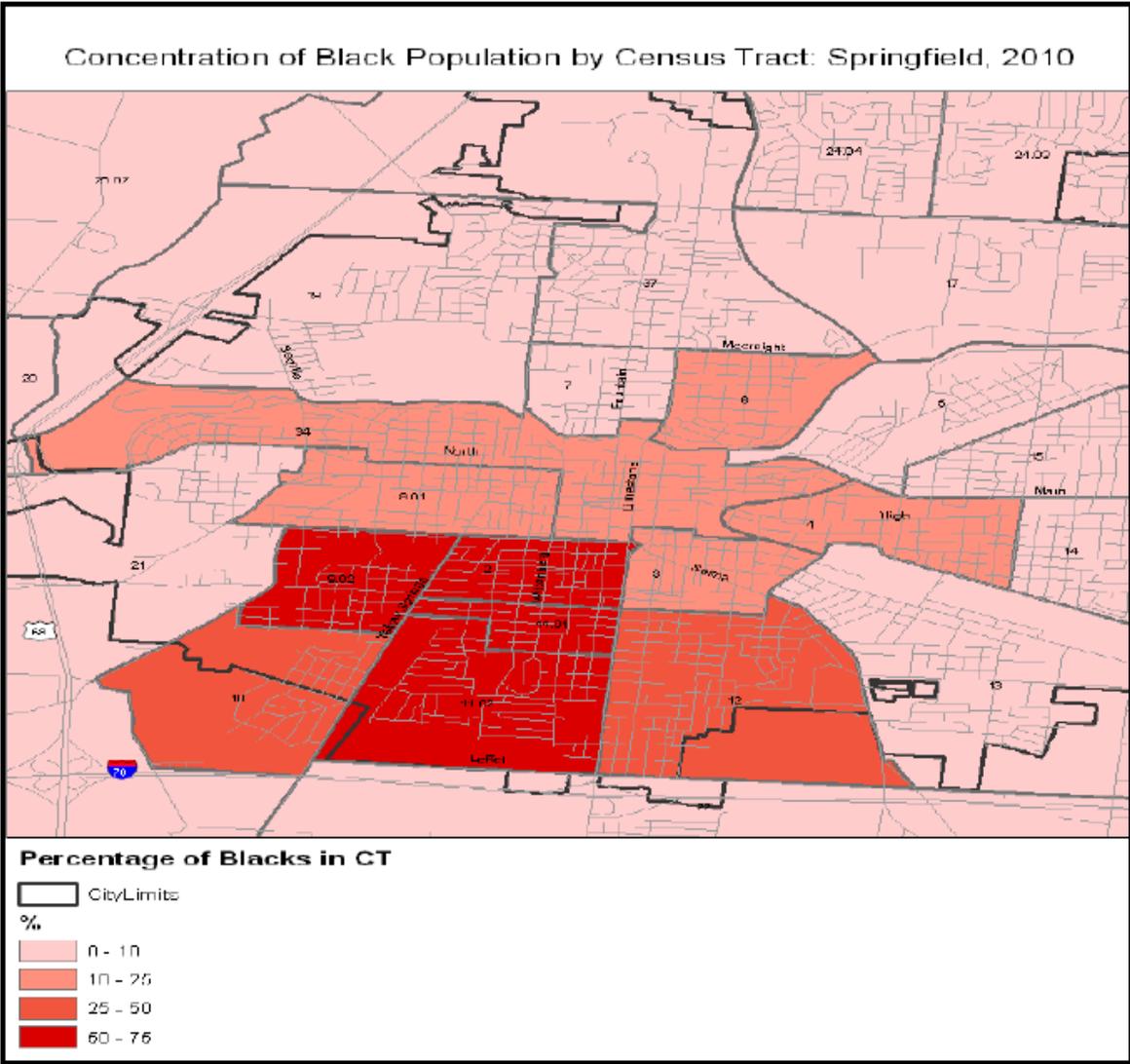
There has not been much written on fair housing in shrinking cities, but it is reasonable to conclude that this creates a different sort of problem than in the past with population. This is something that should be explored more in the future.

III Racial Segregation

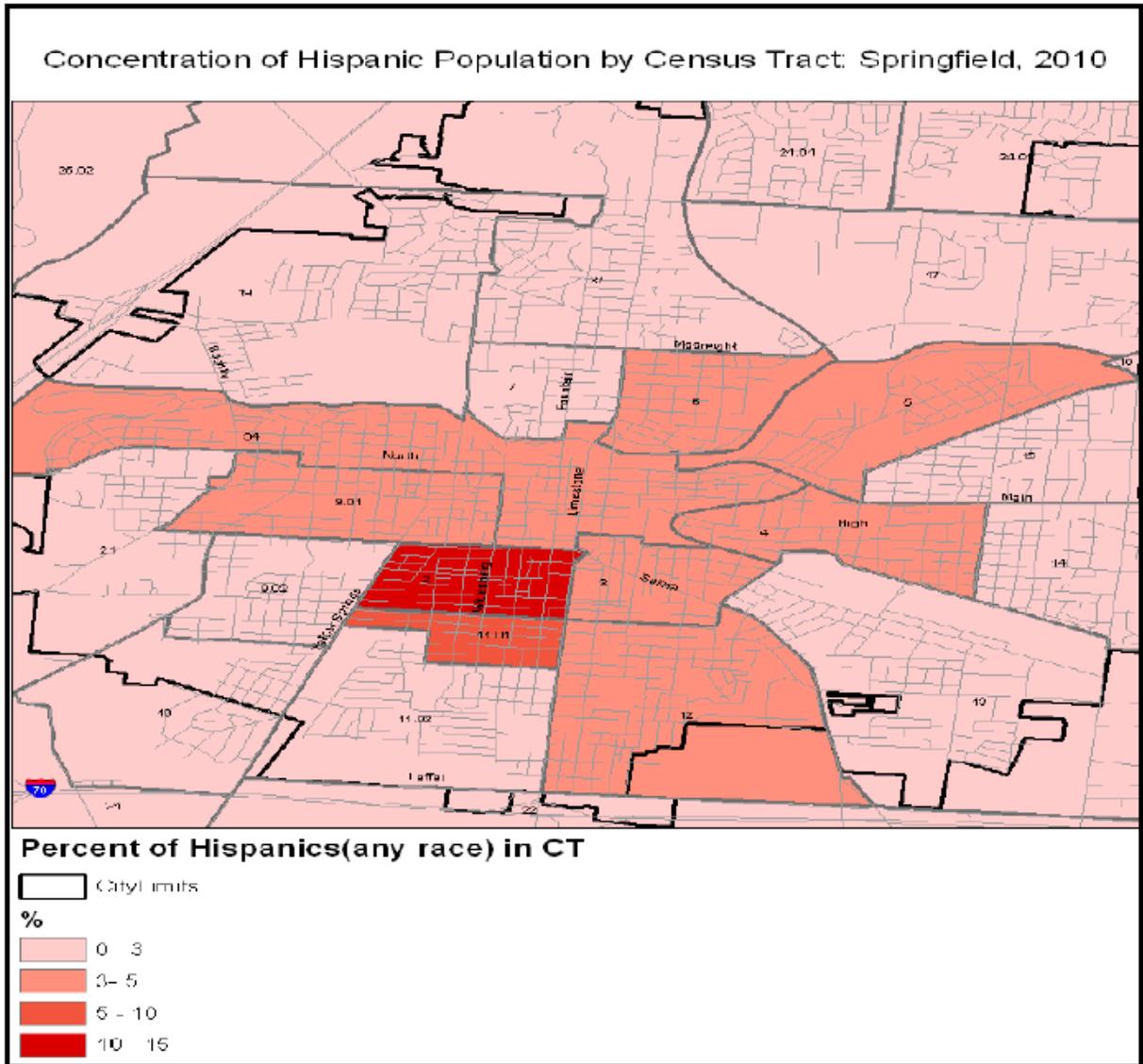
A concern in many cities is the problem of racial segregation which may mean that persons of color live in lower income areas which may be associated with a more difficult environment in terms of condition of the housing, percentage of rental housing, crime and schools.

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 below).

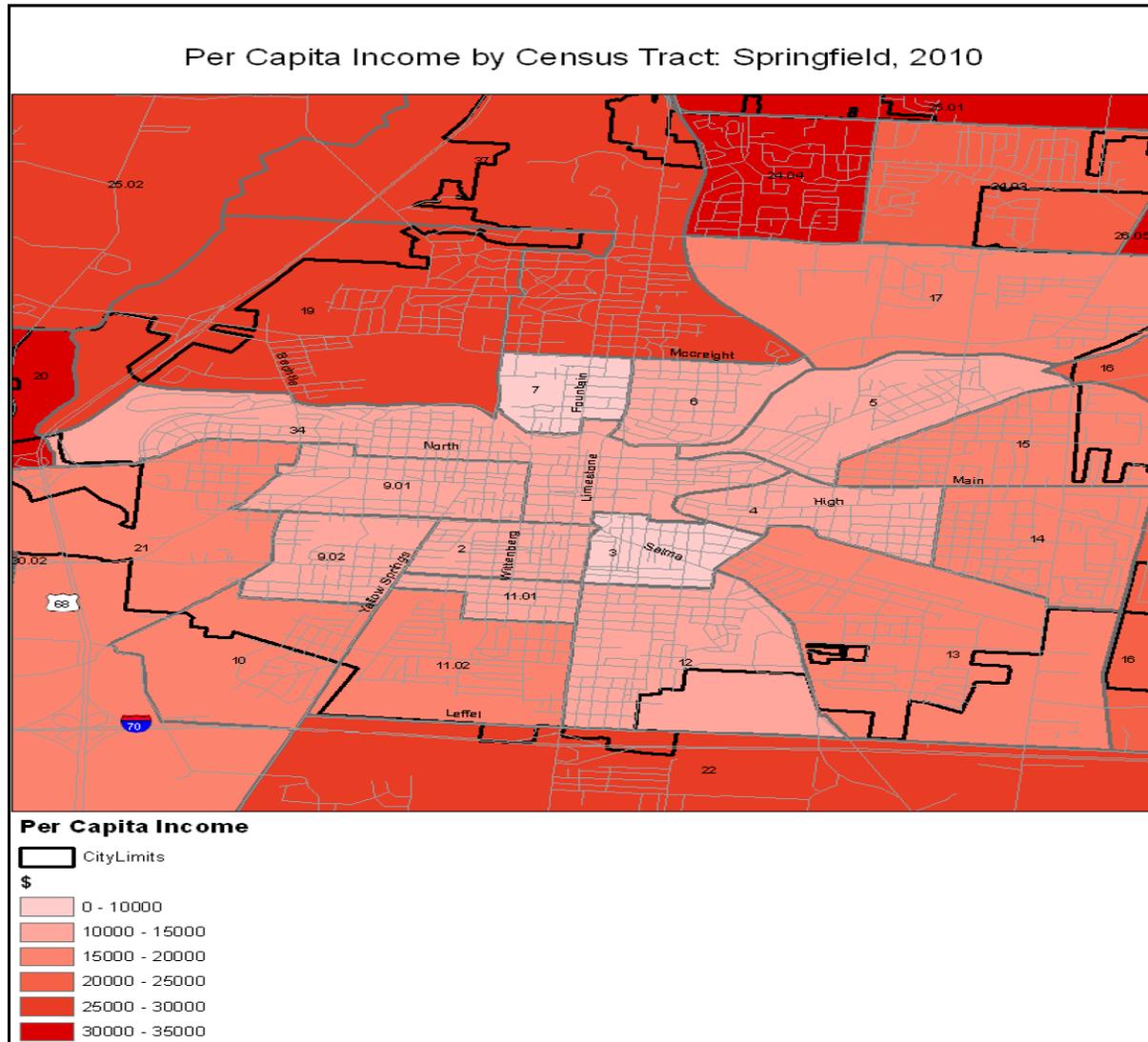
MAP 3: Concentration of Blacks by Census Tract: Springfield, Ohio 2010



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



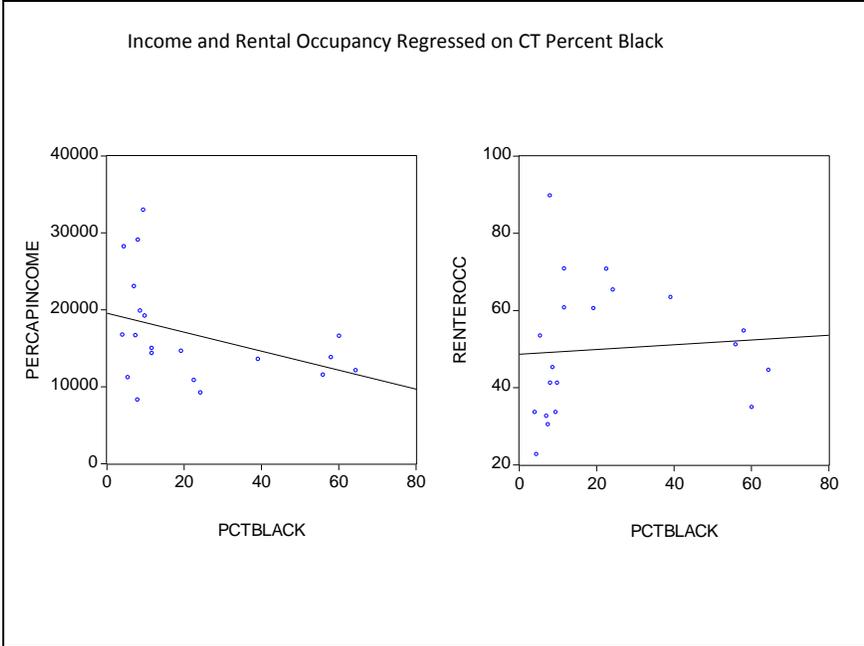
MAP 5: Per Capita Income by Census Tract: Springfield, Ohio 2010



2010 Census 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 in the Selma Road area of Census Tract 3 and the university area of 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

Table 12: HUD R/ECAP DEMOGRAPHICS (AFFH)

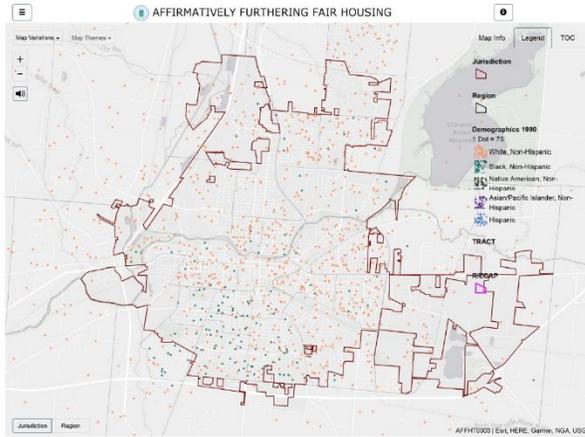
Table 4 - R/ECAP Demographics

	(Springfield, OH CDBG, HOME, ESG) Jurisdiction		(Springfield, OH) Region			
R/ECAP Race/Ethnicity	#	%	#	%		
Total Population in R/ECAPs	5,776	-	5,804	-		
White, Non-Hispanic	2,475	42.85%	2,489	42.88%		
Black, Non-Hispanic	2,508	43.42%	2,519	43.40%		
Hispanic	384	6.65%	385	6.63%		
Asian or Pacific Islander, Non-Hispanic	13	0.23%	13	0.22%		
Native American, Non-Hispanic	24	0.42%	24	0.41%		
Other, Non-Hispanic	22	0.38%	22	0.38%		
R/ECAP Family Type						
Total Families in R/ECAPs	1,405	-	1,412	-		
Families with children	754	53.67%	758	53.68%		
R/ECAP National Origin						
Total Population in R/ECAPs	5,776	-	5,804	-		
#1 country of origin	Mexico	56	0.97%	Mexico	56	0.96%
#2 country of origin	Jamaica	34	0.59%	Jamaica	34	0.59%
#3 country of origin	Germany	11	0.19%	Germany	11	0.19%
#4 country of origin	Null	0	0.00%	Null	0	0.00%
#5 country of origin	Null	0	0.00%	Null	0	0.00%
#6 country of origin	Null	0	0.00%	Null	0	0.00%
#7 country of origin	Null	0	0.00%	Null	0	0.00%
#8 country of origin	Null	0	0.00%	Null	0	0.00%
#9 country of origin	Null	0	0.00%	Null	0	0.00%
#10 country of origin	Null	0	0.00%	Null	0	0.00%
Note 1: 10 most populous groups at the jurisdiction level may not be the same as the 10 most populous at the Region level, and are thus labeled separately.						
Note 2: Data Sources: Decennial Census; ACS						
Note 3: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).						

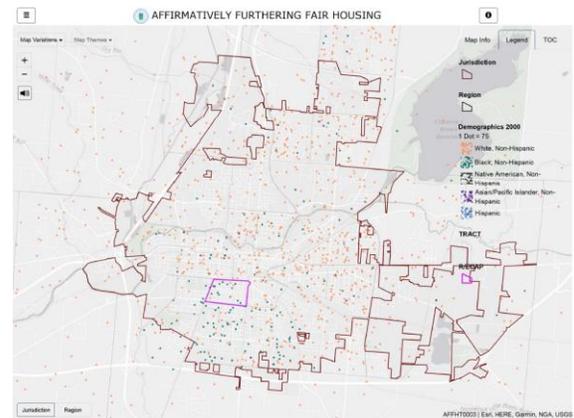
In the new tables provided by HUD for the AFFH, the number of White and Black, non-Hispanics in the R/ECAP areas are relatively equivalent. However, this represents a much larger percentage of the Black population. Only 2,476 of 45,607 (5.4%) whites are in these areas, whereas 2,508 of 10,981 (22.8%) of Blacks are in these areas.

MAPS SHOWING RACIAL ETHNICITY TRENDS 1990-2015

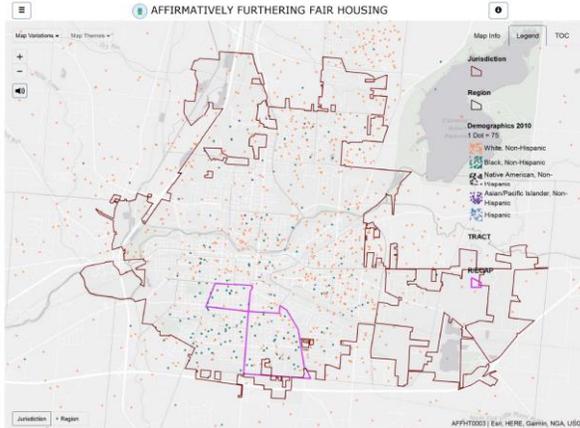
MAP 6: 1990 HUD Race Trends



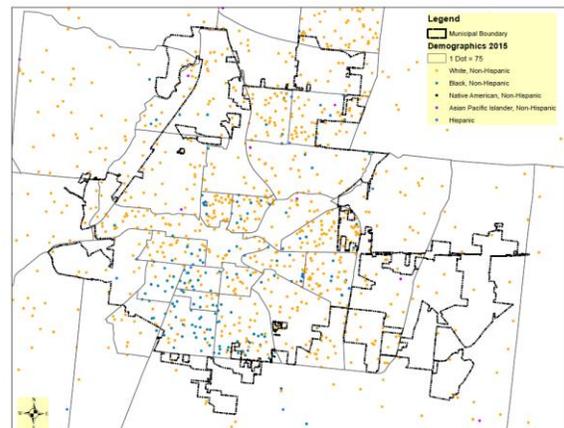
MAP 7: 2000 HUD Race Trends Map



MAP 8: 2010 HUD Race Trends



MAP 9: 2015 CITY Race Trends



These maps, the first three provided by HUD and the last prepared by the City of Springfield, show that racial segregation continues, but also that there is increasing dispersion of minorities throughout the city.

TABLE 13: RACIAL/ETHNIC DISSIMILARITY TRENDS (AFFH)

Racial/Ethnic Dissimilarity Trends

	(Springfield, OH CDBG, HOME, ESG) Jurisdiction				(Springfield, OH) Region			
Racial/Ethnic Dissimilarity Index	1990 Trend	2000 Trend	2010 Trend	Current	1990 Trend	2000 Trend	2010 Trend	Current
Non-White/White	56.44	49.92	44.01	46.41	58.38	49.09	43.06	49.83
Black/White	60.77	57.32	50.50	52.26	65.97	60.59	55.43	62.33
Hispanic/White	22.51	23.60	33.73	32.98	21.08	28.88	38.95	41.81
Asian or Pacific Islander/White	35.32	32.96	31.23	50.39	34.37	29.35	28.82	41.47

Note 1: Data Sources: Decennial Census

Note 2: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).

The racial/dissimilarity trend table provided by HUD for the AFFH shows that the city in 2010 has low segregation for Hispanics and Asian/Pacific Islander/Whites, and moderate segregation for Blacks/Whites and Non-whites/whites, with the trend being toward less segregation in all categories, moving from high segregation to moderate segregation for Non-Whites and Blacks/Whites from 1990 to 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 14: PERCENT MINORITY IN CLARK COUNTY, CITY OF SPRINGFIELD AND CLARK COUNTY OUTSIDE OF SPRINGFIELD

	Total	White	%White	Black	%Black	Latino	%Latino
Clark Co	138,333	119,140	86.13%	12128	8.77%	3805	2.75%
Springfield	60,608	45,607	75.25%	10981	18.12%	1824	3.01%
Outside Springfield	77,725	73,533	94.61%	1147	1.48%	1981	2.55%

IV Housing Market

A. Cost Burden & Housing Problems

Over 7,622 low (including very low and extremely low) income residents suffer a cost burden over 30%, meaning over 52.5% of low income residents suffer from this problem.⁴

⁴ 2015 City of Springfield Consolidated Plan, page18

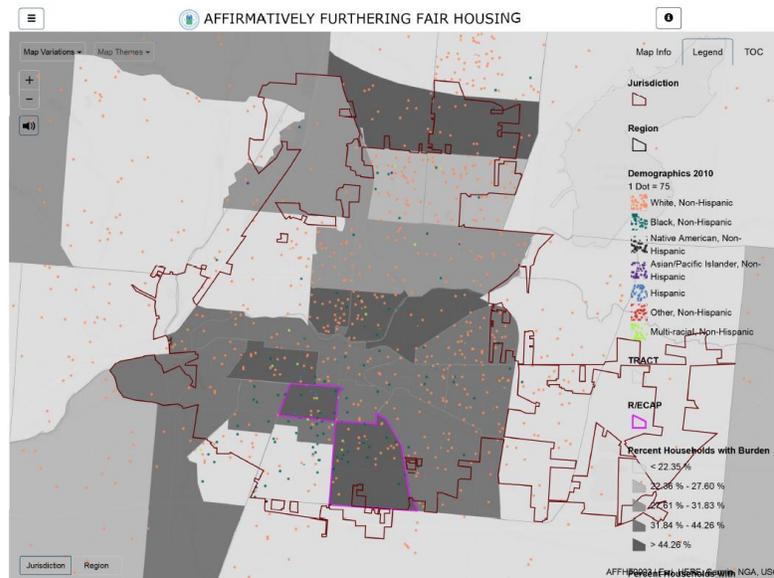
Generally, when a household spends more than 30% of its gross income on housing it is considered excessive, and the household is classified as cost burdened. When households pay higher proportions of their incomes for housing, they are forced to sacrifice other basic necessities such as food, clothing, 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.

TABLE 15: GREATER NEED: HOUSING COST BURDENS AMI

Housing Cost Burden	<=30%		30-50%		>50%		No / negative income (not computed)
Jurisdiction as a whole	15,795		4,870		4,160		230
White	13,045	82.59%	3,660	75.15%	2,980	71.63%	100
Black / African American	2,265	14.34%	1,105	22.69%	915	22.00%	95
Asian	90	0.57%	15	0.31%	0	0.00%	0
American Indian, Alaska Native	49	0.31%	4	0.08%	10	0.24%	0
Pacific Islander	0	0.00%	0	0.00%	0	0.00%	0
Hispanic	130	#DIV/0!	19	#DIV/0!	100	2.40%	10

The housing cost burden in Springfield is shared across ethnic lines, but whites make up the majority of people with a high housing cost burden. 13,045 at the less than 30% AMI of 15,795 people at that level are white, 3,660 of 4,870 at 30-50% AMI and 2,980 of 4,160. Keeping in mind the percentage of minorities in the population at large, one notices that at this level, there are 82.59% people who are white, more than the approximately 75.2% in the general population. However, at the lower levels of poverty, a slightly higher percentage of minorities, than whites, have a high cost burden.

MAP 10: Housing Cost Burden by Race/Ethnicity



This map provided by HUD for the AFFH shows a geographical representation of the above discussion, showing the widespread dispersion of the housing cost burden through out most parts of the city, and across racial/ethnic groups.

B. Disproportionately Greater Needs by Race

While non-white minorities make up a disproportional amount of LMI persons, for each income cohort they experience housing problems at a rate proportional to that of their income group.⁵

C. Recent Home Value Change Report

Zillow Market Overview Research in December, 2017 indicates that home prices in Springfield have risen 6.3% in the past year. However, the peak housing price was in 2006, with the housing bottom prices reached in 2015. So, recovery is just beginning and not impacting all areas of the city, according to their map below. The areas with racial concentration have not yet experienced the housing rebound beginning in the last two years in other areas of the city.

⁵⁵ City of Springfield 2015 Consolidated Plan, page 30.

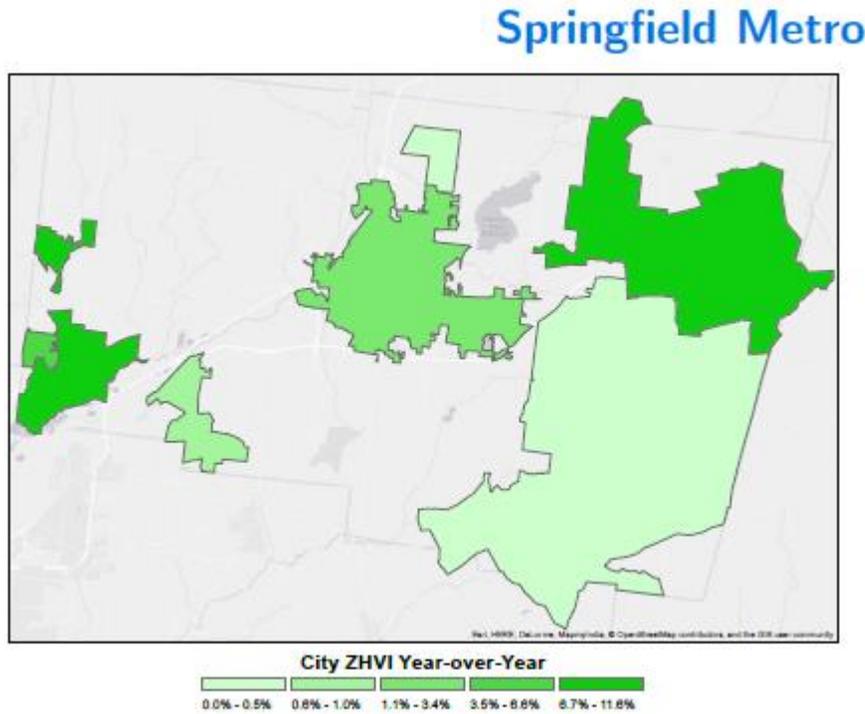
TABLE 16: MARKET OVERVIEW: SPRINGFIELD, OHIO MSA

DECEMBER 2017

Largest Cities Covered by Zillow

	Home Values- ZHVI (\$)	ZHVI MoM (%)	ZHVI QoQ (%)	ZHVI YoY (%)	ZHVI Peak (\$)	Peak Month	Change from Peak (%)	Rents- ZRI (\$)	ZRI MoM (%)	ZRI QoQ (%)	ZRI YoY (%)	Forecast ZHVI (\$)	Forecast YoY (%)	Home Value Bottom	Negative Equity (%)
Enon	126,400	0.2	1.3	1	135,600	2006-11	-6.8	904	4.1	7	1	129,991.5	2.8	2012 Q2	11.9
Medway	94,700	0	0.5	11.4	98,600	2006-11	-4.0	782	0.9	1	3.6	97,320.82	2.8	2011 Q4	12.1
New Carlisle	88,300	0.2	3.9	10.5	90,200	2006-11	-2.1	755	0.5	0	2.3	92,034.4	4.2	2011 Q2	12.5
Northridge	118,900	0	0.7	0.5	124,100	2006-11	-4.2	896	2.1	4.8	3.1	120,690.6	1.5	2011 Q2	7.1
Park Layne	81,800	-0.6	1	6.6	90,000	2006-06	-9.1	746	0.4	-0.5	4.6	84,065.86	2.8	2012 Q1	
South Charleston	129,700	-1.4	-2.8	0	133,400	2017-09	-2.8	870	2.8	4.4	0.6	133,124.9	2.6	2012 Q2	9.7
South Vienna	157,500	0.4	1.6	11.6	157,500	2017-12	0.0	911	1.3	3.2	1.4	161,840.2	2.8	2011 Q2	10.7
Springfield	63,900	0.3	2.1	3.4	74,900	2006-03	-14.7	650	0	0	2.7	65,518.03	2.5	2015 Q4	15.9

MAP 11: HOME VALUE INCREASE IN SPRINGFIELD MSA 2017, ZILLOW RESEARCH



Analysis

In terms of our fair housing issue, there is a concern that minority households have a slightly higher cost burden, more rental housing and more problems with housing. In the past two years, property values have begun to rise again in the city of Springfield as a whole, but have not increased in the southwest quadrant, areas of highest minority population.

V Public Housing

Springfield Metropolitan Housing Authority (SMHA) manages public housing in the City of Springfield and Clark County, Ohio. On January 10, 2017, the Fair Housing Coordinator met with Director, Arlin Tolliver and his executive assistant and HR

Administrator, Stephanie Cameron. The following is a summary of the information they provided. (See Appendix 2 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. The biggest barrier they have here is that they don't have much public housing outside the city limits, and also not as many landlords are willing to take vouchers outside the city limits.

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 appreciate 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, and would post any updates to the posters if available.

D. Fair Housing Training for Staff.

Their staff members attend the Fair Housing Board's annual fair housing training.

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. A packet of information provided at their housing choice voucher briefings was provided which gives this information as well,

F. Racial Makeup of Public Housing Units.

The AFFH tables provide a picture of diversity, for the most part, in SMHA housing units.

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.

In examining the makeup of subsidized housing in Springfield, minorities are disproportionately represented. See the table below which most likely represents their economic level and/or and their ability to obtain living wages.

TABLE 17: PUBLICLY SUPPORTED HOUSING RACE/ETHNICITY BY PROGRAM

(Springfield, OH	Race/Ethnicity							
	White		Black		Hispanic		Asian or Pacific Islander	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	358	59.97%	233	39.03%	2	0.34%	2	0.34%
Project-Based Section 8	502	71.82%	190	27.18%	4	0.57%	1	0.14%
Other Multifamily	20	90.91%	2	9.09%	0	0.00%	0	0.00%
HCV Program	408	46.31%	456	51.76%	12	1.36%	1	0.11%

As far as the dispersion of minorities in the various public housing projects, within the Springfield Metropolitan Housing Authority units, the minorities are dispersed fairly closely to their percentage in public housing in all but Lincoln Park, their newest Hope VI project, where African Americans represent over half of the projects (54%, 64% and 67%), with only 39% of the total population.

TABLE 18: PUBLICLY SUPPORTED HOUSING RACE/ETHNICITY BY PROJECTS

Public Housing								
(Springfield, OH CDBG) Jurisdiction								
Name	PHA Code	PHA Name	# Units	White	Black	Hispanic	Asian	Households with Children
Cole - Woodford	OH021	SMHA	152	68%	29%	1%	1%	1%
Grayhill Homes	OH021	SMHA	175	68%	31%	1%	N/a	34%
Hugh Taylor Homes	OH021	SMHA	160	61%	38%	0%	1%	32%
Lincoln Park Phase 1a	OH021	SMHA	40	33%	67%	0%	N/a	89%
Lincoln Park Phase 1b	OH021	SMHA	68	36%	64%	0%	N/a	58%
Lincoln Park Phase 2	OH021	SMHA	24	46%	54%	0%	N/a	100%
Scattered Sites li	OH021	SMHA	8	N/a	N/a	N/a	N/a	N/a

In terms of the Project Based Section 8 units, 28% of the population is minority. So Tubman Towers and Opportunity Gardens have a disproportionate number of minorities, while Ronez Manor, Resource Center and Springfield Towers, have a disproportionate few minorities.

TABLE 19: RACE/ETHNICITY IN PROJECT-BASED SECTION 8

Project-Based Section 8						
(Springfield, OH CDBG) Jurisdiction						
Development Name	# Units	White	Black	Hispanic	Asian	Households with Children
North Hill Towers li	64	70%	28%	2%	N/a	N/a
O.G.Springfield	45	27%	73%	0%	N/a	N/a
Resource Center Apartments	16	75%	19%	6%	N/a	N/a
Ronez Manor Apartments	178	80%	18%	1%	N/a	75%
Springfield Towers	120	90%	9%	0%	N/a	N/a
Sunset Hills Assc. Jnt. Venture, Gp	128	65%	33%	1%	1%	50%
Tubman Towers	99	43%	57%	0%	N/a	N/a
Villa Park, Ltd.	150	76%	23%	1%	N/a	31%

H. Fair Housing Review

Their last fair housing review was in 2008, with a copy on file in their office. A review was planned for 2012, but was cancelled and has not been rescheduled. 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, due to family, transportation, job and childcare concerns.

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

None noted.

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 residents.

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 work hard to encourage their housing choice voucher holders to locate in higher income areas, although many do not choose to do so.

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.

In terms of racial segregation in public housing, this does not seem to be a problem within metropolitan housing, except for Lincoln Park. But there is more evidence of segregation in the other units.

VI Real Estate Community

A. Survey of Market.

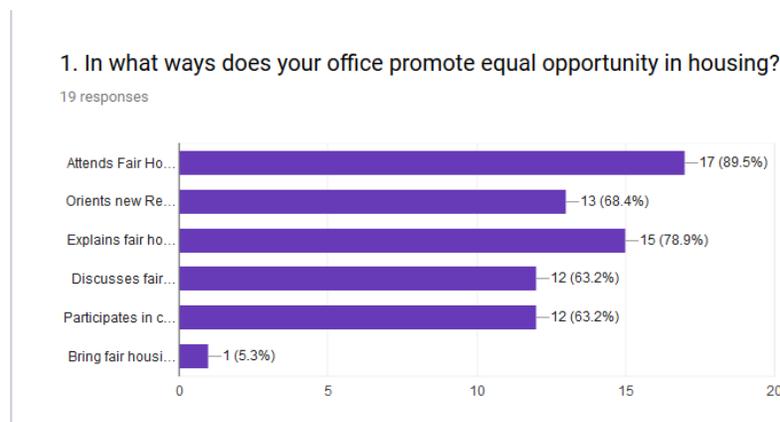
The Executive Board of the Springfield Board of Realtors has 13 members. The current president is of Asian descent with eight white women and four white men members. In February 2018 they have 33 Broker office members, with a total of 199 members. One broker is African-American, another is Asian, the others are white. Of the 199 Realtors, 112 are women (56.3%), 87 are men (43.7%). There are 11 minority Realtors (6%), including one Asian man, one African-American man and nine African-American women. Nine brokerage offices (26%) have minority Realtors, and the other 24 only have white Realtors (74%). (See Appendix 3)

B. Self-Report Survey.

All Springfield Realtors were invited to participate in an online survey concerning fair housing. The survey was sent out twice in December, 2017 and January 2018. There were 20 responses. (See Appendix 4)

The first question asked in what ways they promote equal opportunity in fair housing.

FIGURE 4: REAL ESTATE SURVEY QUESTION #1

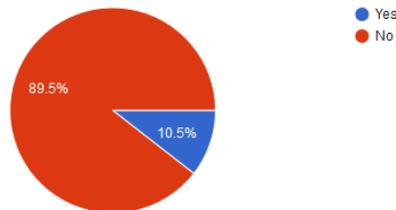


89.5% (17) indicated that they attend fair housing training. 78.9% (15) reported that they explain the fair housing law to buyers and sellers. 63.2% (12) discuss fair housing practice in office meetings. 68.4% (13) orient new agents to fair housing practice and 5.3% (1) serve on the Board's Equal Opportunity Committee.

FIGURE 5: REAL ESTATE SURVEY QUESTION #2

2. Are you aware of any barriers to equal opportunity in housing in Springfield and Clark County?

19 responses



When asked if they are aware of barriers to equal opportunity in our community only 10.5% (2) of Realtors answered yes. Comments on this question included the following responses:

- I am not sure, but personally I believe there is a lot of prejudice that still exists. I don't think people believe they are but I often hear, but I will not tolerate it
- Yes, many landlords do not want to rent to African Americans, gays or Latinos. Some landlords force tenants to pay for maintenance costs up to \$175.00 per month. Many landlords force tenants to pay water and trash charges on top of inflated rental charges. Landlords do not distribute pamphlets on Tenants Rights and/or Lead Base information.
- Individuals with poor credit are at the mercy of slum landlords.

A third question asked Realtors what actions should be taken related to fair housing. Responses were:

- I think a round table discussion may help, or even an eye opening contemporary example of fair housing discrimination given to the board. I also find that many fair housing classes could be presented in a different way. Most of my classes on fair housing, and I am not talking about local presenters, but they are repetitive and feel like I don't learn anything new, I think it needs new and updated information and a new presentation style as frequently many of us get our 3 hours required and never look back.
- Continue with CE classes for agents
- Evening CE class on Fair Housing
- Continue offering educational classes regarding fair housing and include fair housing discussions as regular meetings. Include the City of Springfield in ongoing communications with SBOR.
- Continue on with classes
- I think the required CE covers it pretty well especially if we take the local class offered.
- Just continue to keep Realtors educated and aware
- Better education for buyers who become new landlords.
- Not sure

The last question asked what more the City of Springfield could do to promote equal opportunity in housing. Suggestions included:

- You know what, we can probably make a combined effort on this. I wouldn't mind serving on a committee if you have something where we brain storm and perhaps develop a new strategy to teach more awareness
- Offer CE class on Fair Housing
- Education of the general public concerning opportunities for home ownership and fair rental practices in our community
- Continue on
- Continue to participate in the CE class we are required to take.
- Pass a city ordinance and give large fines if this is (ordinance) violated each time it happens.
- Inform realtors with stats - is there an issue? Positive or negative?
- Treat everyone equally
- Three people had no suggestions.

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 IX of this document.

D. Focus Group.

In the Focus Groups conducted by Harper Mack Associates in December, 2017 and January, 2018, there was a Housing Provider Group, which included some Realtors. the Realtor's Focus Group indicated they believe there are fair housing problems for Hispanics, African-Americans and people with disabilities.

E. Other Focus Groups.

See Section VIII 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).

TABLE 20: FOCUS GROUP DISCRIMINATION SURVEY RESULTS

Question	YES	NO	Don't know	Total #
1. Do you believe there is retaliation for reporting housing discrimination?	36 51.43%	20 28.57%	14 20.00%	70
2. Do you believe landlords discriminate because of the presence of children under the age of 18	32 42.67%	19 25.33%	24 31.58%	76
3. Are you aware of instances of discrimination because a pregnant female is in the family?	13 16.88%	39 50.65%	25 32.05%	78
4. Have you or anyone you know experienced a landlord, realtor, lender or other who has falsely said housing was not available when it was available?	23 29.87%	31 40.26%	23 29.49%	78
5. Have you or anyone you know experienced realtors who steer clients into certain parts of Springfield or the county	35 45.45%	22 28.57%	20 25.64%	78
6. Have you or anyone you know been discriminated against in the conditions or terms of sale, rental or services of facilities? non-refundable rental application fee, withholding deposits, clauses in the contract?	40 59.70%	23 33.82%	4 5.88%	68
7. Have you or anyone you know been refused a mortgage loan, when they could afford it?	16 23.88%	26 38.81%	25 36.76%	68
8. Have you or anyone you know been refused information regarding loans?	23 31.08%	28 37.84%	23 30.67%	75
9. Have you or anyone you know had different terms or conditions imposed on a loan, such as different interest rates, points or fees, based on discrimination?	15 21.74%	24 34.78%	30 42.86%	70

F. Complaints.

There were 35 fair housing complaints closed with the Ohio Civil Rights Commission during the reporting period (2013-2017). These cases included 20 alleging handicap discrimination, 10 race, 9 familial status, 3 gender, 3 retaliation, 2 religion, 2 national origin and one age. Cases withdrawn after resolution included one disability case, one case involving disability and retaliation and a third involving national origin and religion. Three cases were conciliated with a settlement, which included three disability cases. Another disability case was dismissed for lack of jurisdiction. A final disability case was charged or FHAP caused. However, most of these cases were concerning rental housing, most not involving Realtors.

(See Appendix 5 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. Retaliation for filing a fair housing complaint continues to be a concern. 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 remained stable at 12 in the past five years. Leading the market remains Park National Bank with 32% market share, followed by Huntington with 17% and PNC Bank with 15%. These top three saw their local deposits grow, with slight shifts in their market share. Among the

banks with less than 10% market share, there were a few shifts. Home City moved into 4th place with a market share of 7.75%. Keybank moved from 4th place to 5th place, now with 7.4% market share. Fifth Third moved from 7th to 6th, now with a 6.67% market share. WesBanco, moved from 5th to 7th, now with 6.22%. Among the banks with less than 5% market share, New Carlisle Federal remained unchanged in 8th place. The Citizen's National Bank of Bluffton moved up from 10th to 9th place, now with a 1.04% market share, while US. Bank moved up to 10th place. Mercahnts National Bank moved down from 9th to 11th and Woodforest remained unchanged in 12th place.

Table 21: 2012 Summary of Deposits for Springfield MSA

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	6384	DE	N	Federal	3,037	203,143,270	7	231,893	15.40%	
KeyBank National Association	17534	OH	N	Federal	1,070	61,541,439	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	28554	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	6605	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	10,339	630,704,115	41	1,505,808	100.00%

Table 22: 2017 Summary of Deposits for Springfield MSA

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	
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Number of Institutions in the Market: 12					TOTALS	10,339	630,704,115	41	1,505,808	100.00%

Table 23: CRA Ratings Chart for Springfield MSA Banks 2017
Source: FFIEC COMMUNITY REINVESTMENT Website

Bank	Location of Headquarters	CRA Rating	Year Evaluated
Park National Bank (Security National Bank)	Newark, OH	Satisfactory (Large Bank)	2014
Huntington National Bank	Columbus, OH	Satisfactory (Large Bank)	2012
PNC Bank, National Association	Wilmington, DE	Outstanding (Large bank)	2009
Home City Federal Savings Bank of Springfield	Springfield, OH	Satisfactory (Small Bank)	2014
Key Bank	Cleveland, OH	Outstanding (Large Bank)	2011
Fifth Third Bank	Cincinnati, OH	Needs to Improve (Large Bank)	2014
WesBanco	Wheeling, WV	Outstanding (Large Bank)	2017
New Carlisle Federal Savings Bank	New Carlisle, OH	Satisfactory (Small Bank)	2014
Citizens National Bank of Bluffton	Bluffton, OH	Satisfactory (Intermediate Small Institution)	2017
U.S. Bank, National Association	Cincinnati, OH	Satisfactory (Large Bank)	2012
Merchants National Bank	Hillsboro, OH	Outstanding (Intermediate Small Institution)	2016
Woodforest National Bank	The Woodlands, TX	Satisfactory (Large Bank)	2015

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

B. HMDA data

TABLE 24: LOAN APPLICATIONS, ORIGINATIONS AND DENIALS BY RACE

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

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 paper⁶: "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."

For the current analysis, staff reviewed recent HMDA data on the FEEIC.org website, compiling data from the Aggregate Tables 4:1-4 for 2016. (This includes home purchase, refinance and home improvement loans for 1-4 family and manufactured home dwellings for the Springfield MSA.) See Table 25.

TABLE 25: 2016 HMDA DATA BY RACE/ETHNIC GROUP SPRINGFIELD MSA

Race or Ethnic Group	TOTAL APPS	% of APPS	TOTAL ORIG	% OF ORIG	TOTAL DEN	% of DEN	DENIAL RATE
AMERICAN INDIAN/ALASKA NATIVE (TOTAL)	17	0.4%	3	0.1%	10	1.0%	58.8%
ASIAN (TOTAL)	12	0.3%	7	0.3%	4	0.4%	33.3%
BLACK OR AFRICAN AMERICAN (TOTAL)	171	3.9%	87	3.2%	57	5.8%	33.3%
NATIVE HAWAIIAN/OTHER PACIFIC ISLND (TOTAL)	8	0.2%	7	0.3%	0	0.0%	0.0%
WHITE (TOTAL)	3623	81.6%	2287	84.3%	729	74.7%	20.1%
2 OR MORE MINORITY RACES (TOTAL)	4	0.1%	1	0.0%	0	0.0%	0.0%
JOINT (WHITE/MINORITY RACE) (TOTAL)	32	0.7%	19	0.7%	4	0.4%	12.5%
RACE NOT AVAILABLE (TOTAL) 6/	524	11.8%	271	10.0%	160	16.4%	30.5%
HISPANIC OR LATINO (TOTAL)	50	1.1%	30	1.1%	12	1.2%	24.0%
	4441		2712		976		22.0%

This 2016 data indicates that the denial rate has declined for most races, although Black and Asians still are being denied loans for 33% of applications and American Indian/Alaska Natives have the highest denial rate of 58.8%. There continues to be a problem that minorities do not apply for as many loans as whites. For example, African-Americans make up 17% of the population, but only account for 3.9% of the loan applications and 3.2% of the loan originations. Likewise, Hispanics, who make up 3% of the population only account for 1.1% of the total applications and originations.

Predatory Lending was a significant problem when the City completed an 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

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

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."

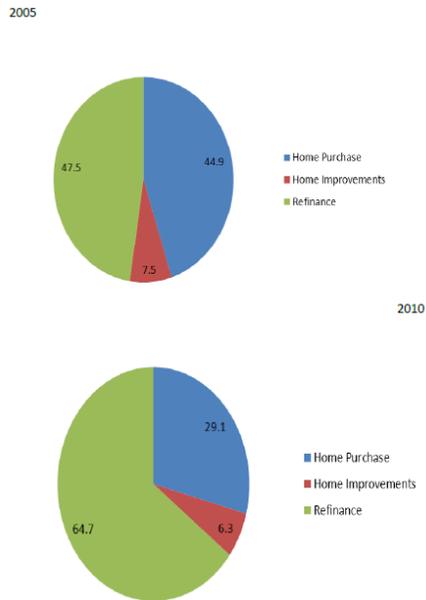


FIGURE 6: SPRINGFIELD MSA LOANS 2006-2010 Source: Lenz Fair Housing Paper

Figure 6 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%

In the past five years, since Lenz completed his analysis, the housing market has improved somewhat in Springfield. The number of home purchase loans in the MSA has risen, while the number of refinance loans has dropped by almost 50%, the number of home purchase loans has risen 30%. Economic recovery has led to a higher percentage of home purchase loans, similar to the 2005 data.

FIGURE 7: SPRINGFIELD MSA LOAN APPLICATIONS 2012

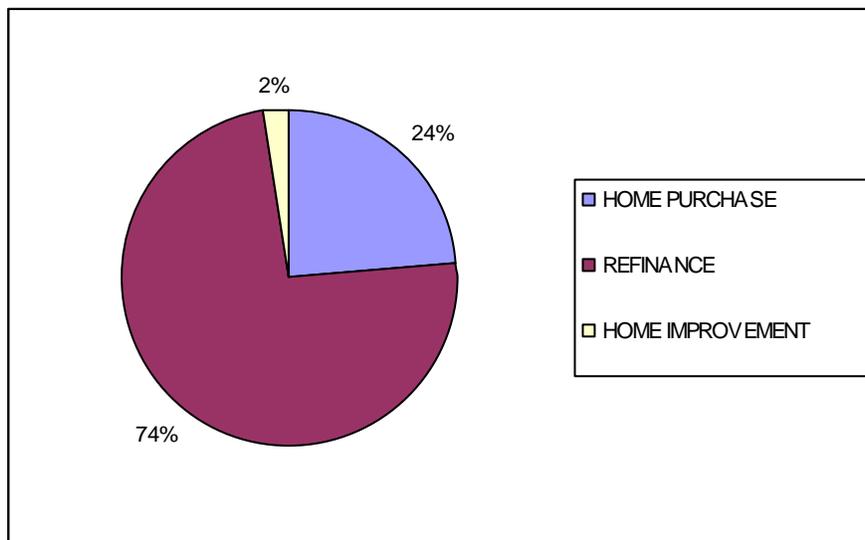


FIGURE 8: SPRINGFIELD MSA LOAN APPLICATIONS 2016

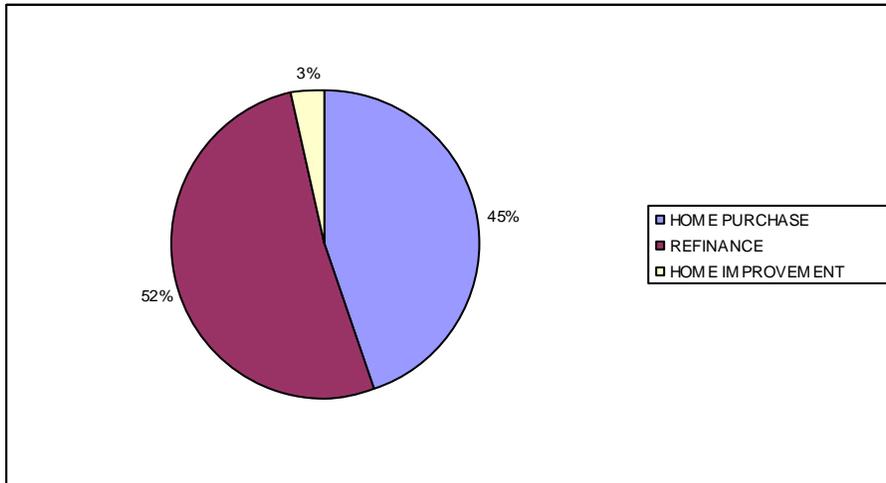


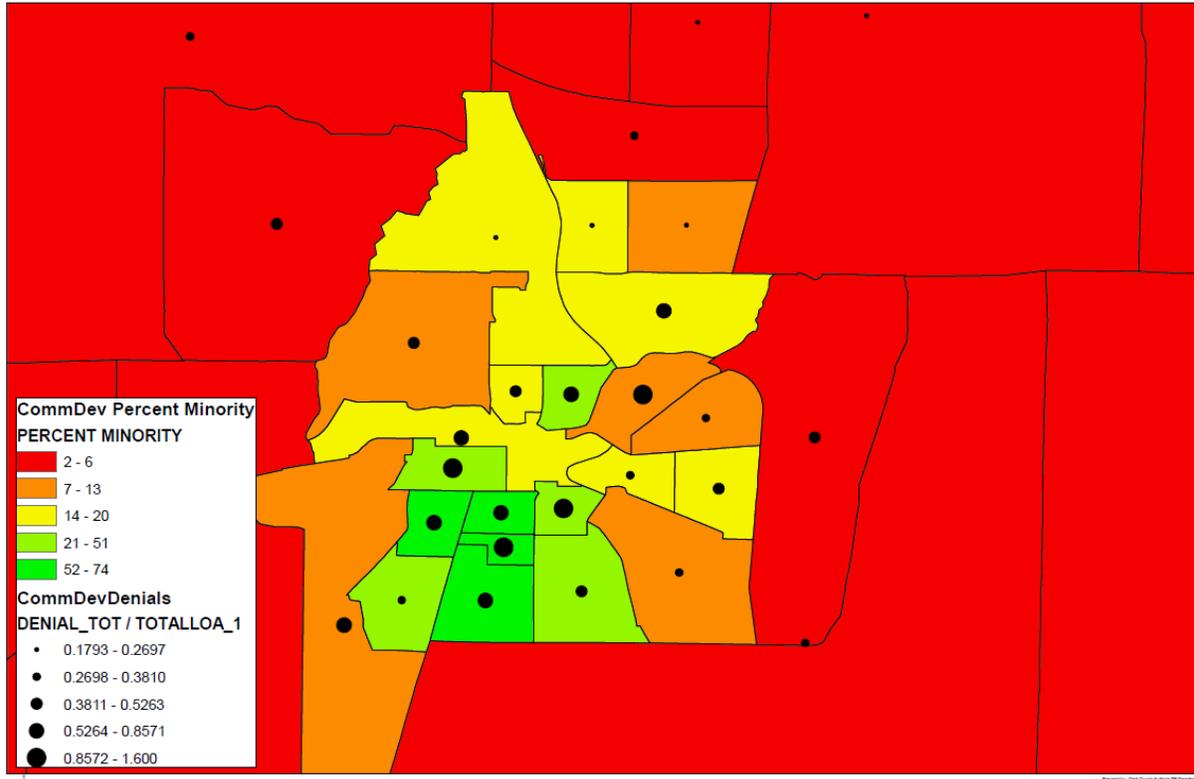
TABLE 26: HOME PURCHASE, HOME REFINANCE AND HOME IMPROVEMENT LOANS (SPRINGFIELD MSA 2012-2016)

	HOME PURCHASE	REFINANCE	HOME IMPROVEMENT
2016	1772	2069	131
2015	1541	2087	126
2014	1415	1804	130
2013	1411	3563	147
2012	1246	3849	110

For this analysis the Clark County GIS Mapping office developed maps also utilizing 2016 HMDA data from the FEEIC.org website to provide visual information on how loans are being provided across census tracts, with a special concern to how minority and low income tracts are being served.

In this map, total denials were mapped in census tracts, with colors indicating the percentage of minority each each tract. Here, one can see that the denial rates were higher in some of the minority census tracts, but also in some low minority areas.

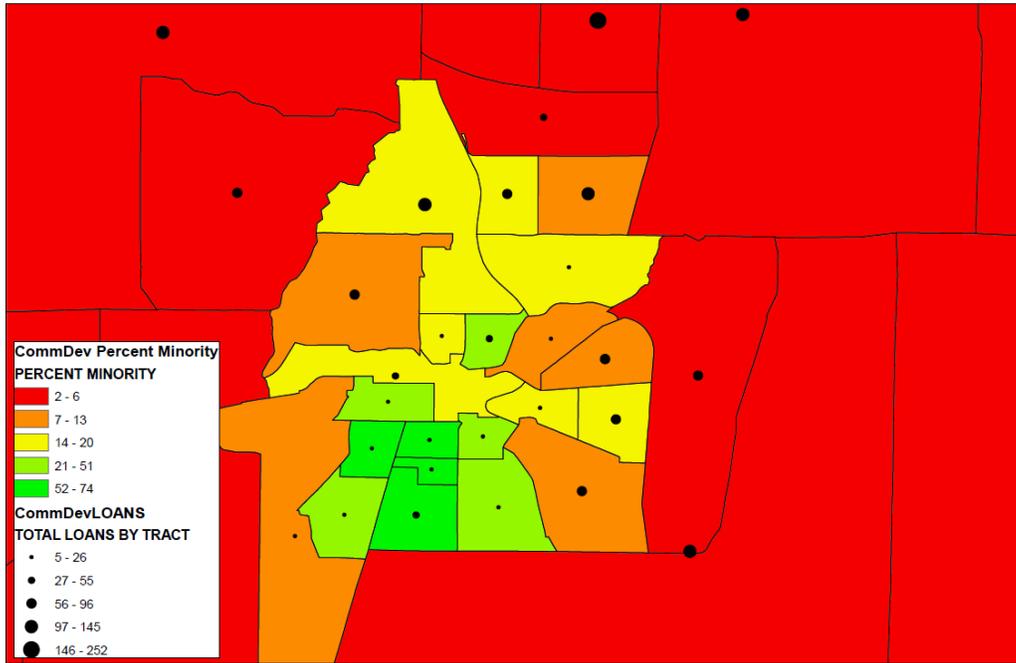
MAP 12: HOME LOAN DENIAL RATES BY CENSUS TRACT AND % MINORITY IN TRACT.



Source: FEEIC data, prepared by Matt Weber, Clark County, Ohio Auditor's GIS Department

Also, it is clear that fewer loans are given in some of the minority neighborhoods, according to this map.

MAP 13: Total Home Loans by Census Tract and % Minority in Tract.



C. Foreclosures

The number of new foreclosure cases filed in the Springfield MSA have declined by 50% during the past five years. However, in the past three years, the number of new cases filed has remained relatively stable at 450 (2014), 458 (2015) and 449 (2016), which is still three times the foreclosure rate in the county before the foreclosure problem began. The Clark County sheriff’s foreclosure sales show a similar trend, with a decline, but then again leveling off at 340 (2015), 428 (2016), 398 (2017). This probably indicates that the years of predatory lending continues to impact our housing market.

FIGURE 9: CLARK COUNTY NEW FORECLOSURE FILINGS. (1995-2016)
SOURCE: SUPREME COURT OF OHIO/POLICY MATTERS OHIO

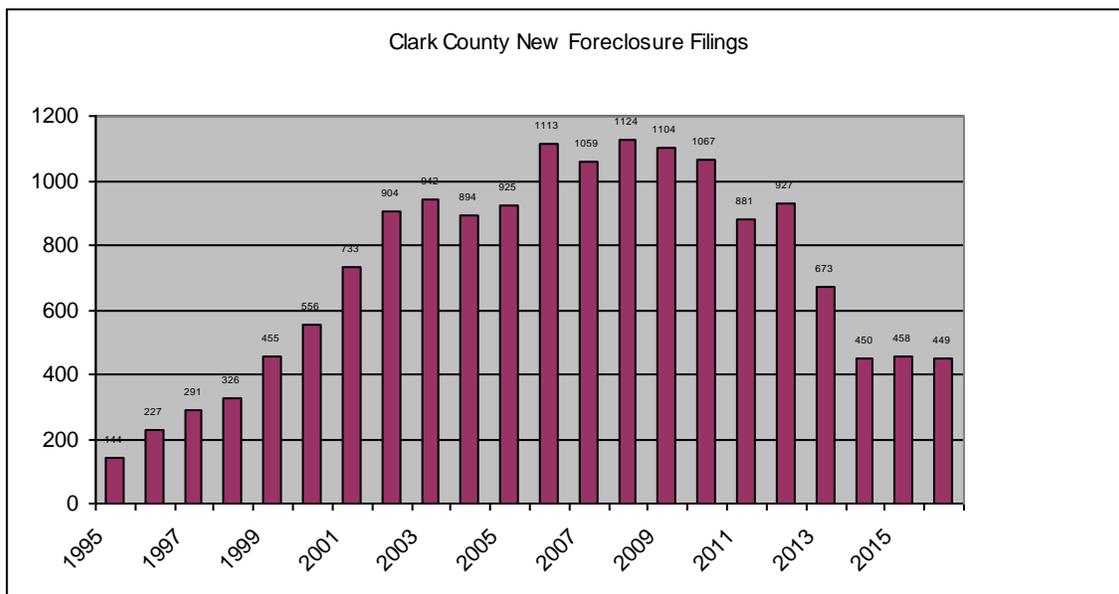
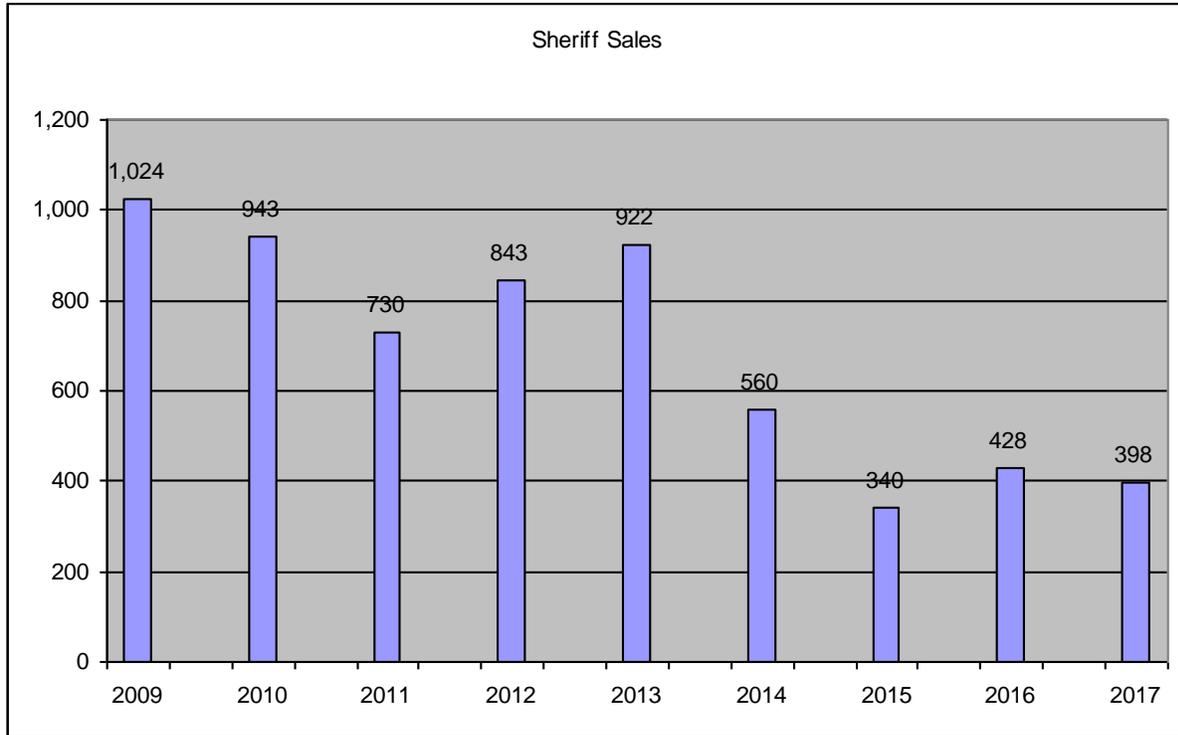
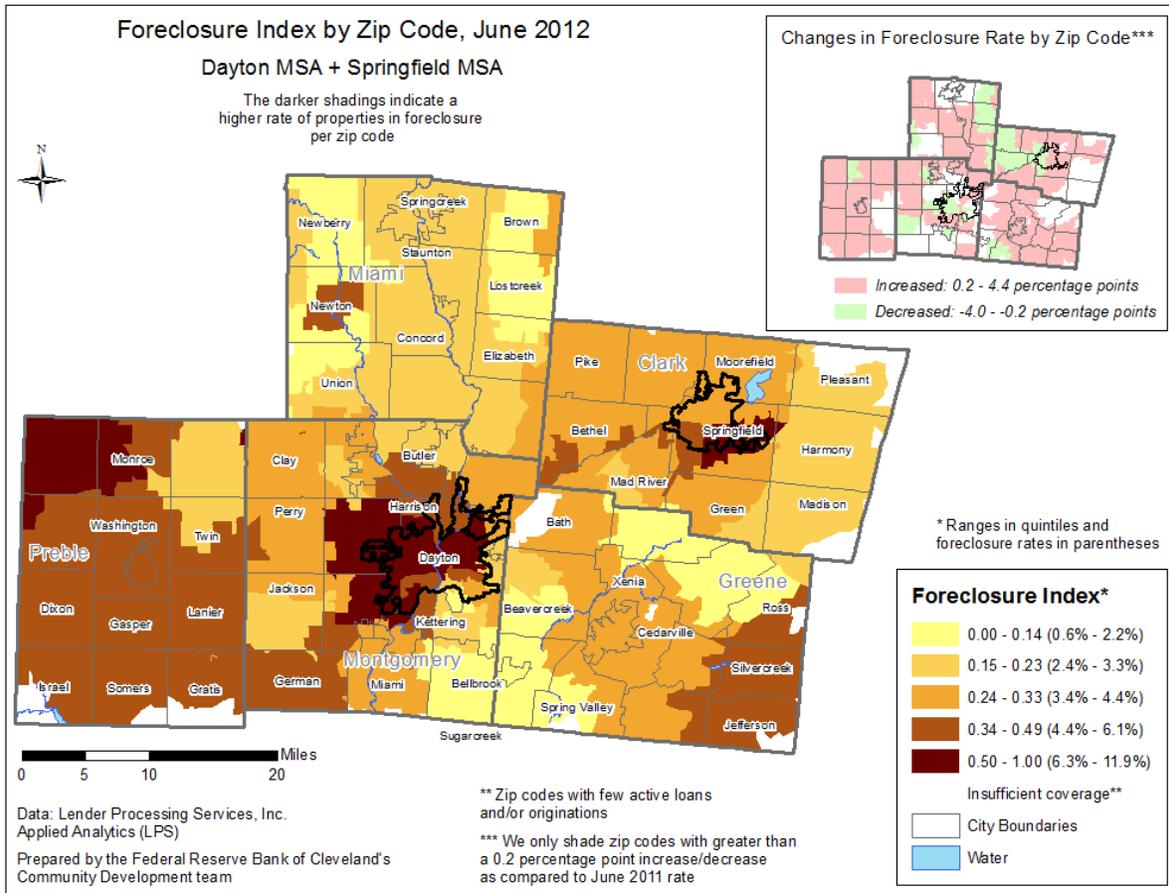


FIGURE 10: CLARK COUNTY SHERIFF SALES. (2009-2017)
SOURCE: CLARK COUNTY SHERIFF'S OFFICE



MAP 14: Foreclosure Index by Zip Code, June 2012



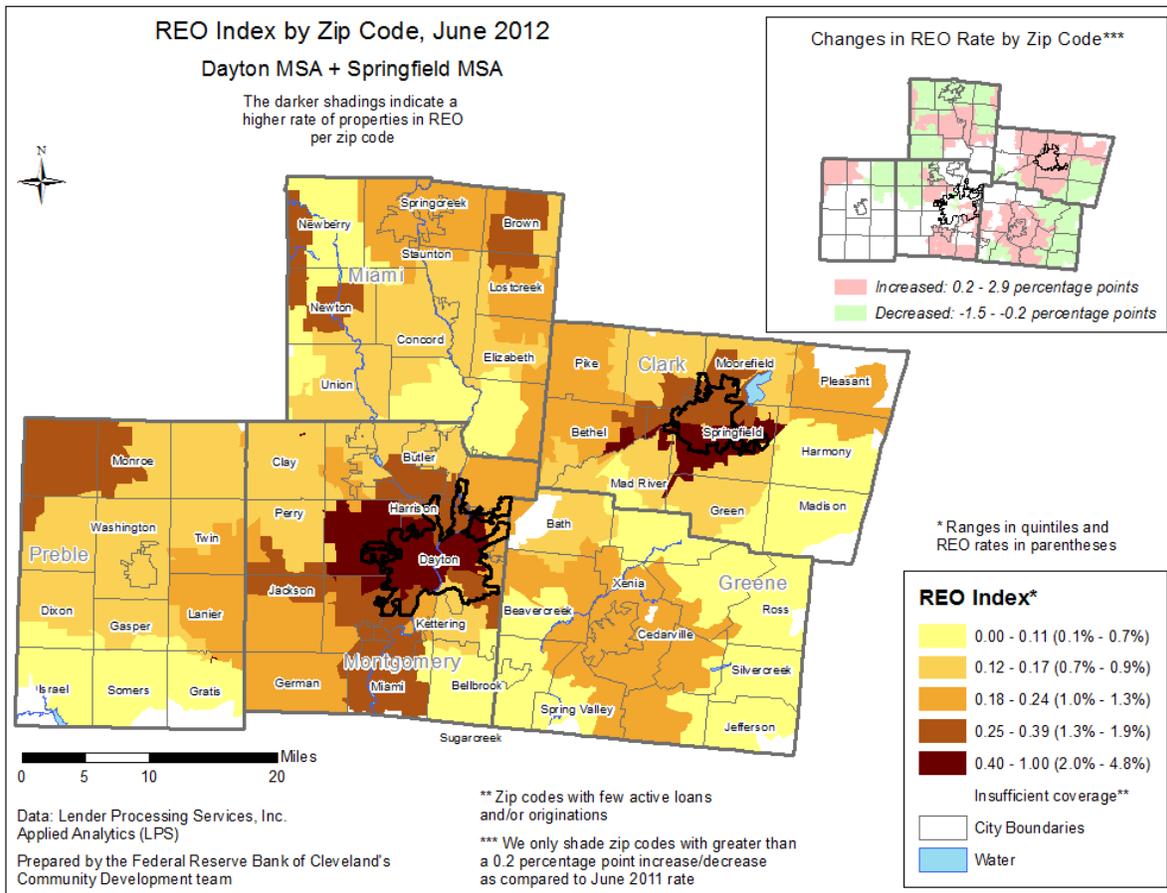
A past analysis by the Federal Reserve Bank indicates that the foreclosure problem has impacted the entire city, although some areas are more pronounced. Map 7 shows that the foreclosure problem was the largest in the southeast quadrant with a foreclosure rate of 6.3-11.9%. The southwest was the area 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 had increased in all quadrants of the City in the 2012, showing that the affect of foreclosure continues to plague the city. (See Map 15) 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%).

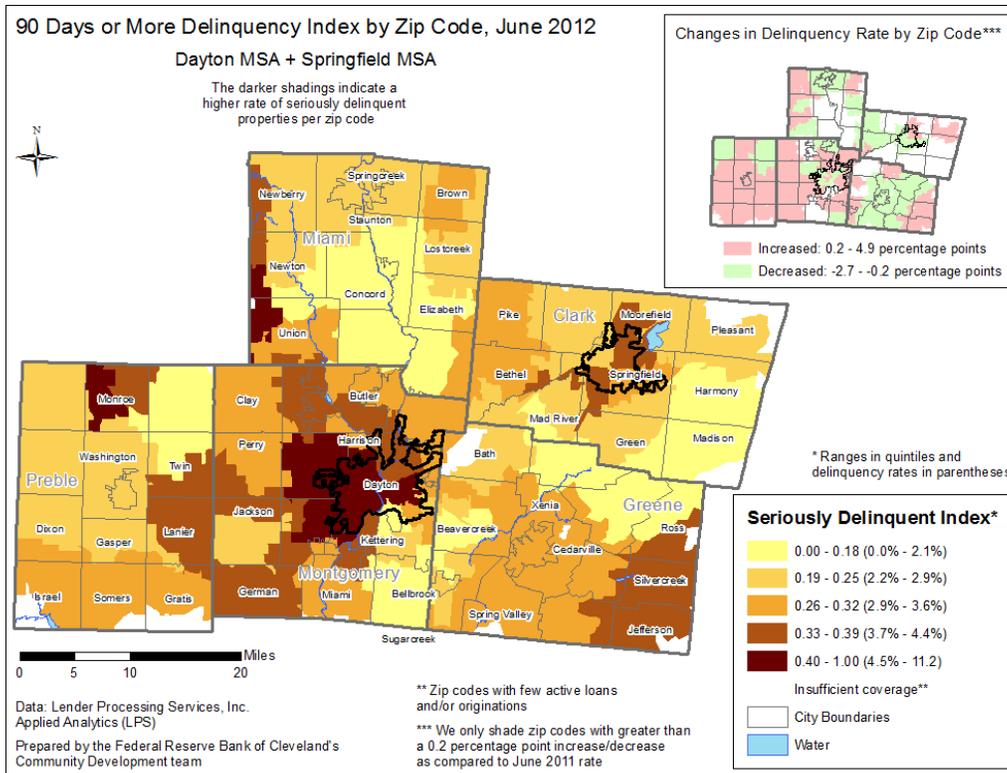
And although the number of court cases has begun to decline, Map 16 indicates shows that there are still a considerable number of properties at risk for foreclosure in the near future, with 90 days or more delinquency. In this category the southwest and northeast quadrants have the most properties in 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 15: REO PROPERTIES INDEX BY ZIP CODE, June 2012



MAP 16: 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 in the past five 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. Several of the lenders expressed concern about discrimination in both lending and other areas, although some did not think there is a problem. See **Appendix 6** for the full report. The Fair housing office also sought input from local banks and mortgage companies via an online survey. No lenders responded after follow up phone calls and a second email.

E. Other Focus Groups

In the other focus groups conducted by HarperMack, approximately a third of participants expressed knowledge of discrimination related to mortgage lending, a third did not believe it was a problem and another third did not know if it's a problem.

Analysis

In the past five years, our lending situation reached a low in terms of home sales and lending, but now is starting to improve. The foreclosure problem is also improving although the foreclosure rate is still at twice what it was before the problem began. 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 Community Input

Since our last analysis of impediments, the fair housing offices has engaged several processes to listen to the community. The first was driven by the city's Human Relations Board, which conducted a survey at the CultureFest Fair Housing booth in September 2013. They followed this with two community forums in early 2014. In 2015, the City Fair Housing Coordinator convened a discussion among landlords, tenant and the organizations who work with both to discuss possible improvements. And thn in late 2017 and early 2018, the Harper Mack Group conducted eight focus groups to listen to many segments of the community related to fair housing. A summary of these processes and their findings follow.

A. CultureFest Fair Housing Booth Survey and Community Forums

The City's Human Relations Board, which meets monthly, began a survey of the community in 2013. At CultureFest, they requested responses on a short survey related to discrimination in the Springfield Community. They followed this up with several community forums to get qualitative information related to the survey findings.

This study showed that among the 149 people who responding to the survey, there was most concern about discrimination related to Race (105), Color (92) and Sexual Orientation (88). The majority of those who responded expressed a concern that there is discrimination or may be discrimination in the classes of race, color, national origin, familial status, religion, gender, disability status, and sexual orientation. The only areas where the majority indicated they did not believe there was discrimination were in the classes of military status and ancestry.

To follow up on this study, the Human Relations Board conducted two community forums in February and March, 2014. The findings from these focus groups indicate that in response to the question: "What has been your experience related to discrimination in Springfield?", there was agreement among many of the groups regarding the type of discrimination which were mentioned in the various groups. The main concerns commonly expressed in the groups were:

- Racial Discrimination (9 of 9 groups discussed this problem)
- The City's North/South(geographic) Divide – Perception/Development Issues (8 of 9 groups discussed this problem.)
- LGBT Discrimination (7 of 9 groups discussed this problem.)
- Issues of discrimination related to age, language, gender and disabilities (2 of 9 groups discussed each of these problems.)

See Appendix 7 for their full report to the Springfield City Commission on this process.

B. Landlord-Tenant-Organization Listening Process

Beginning in May, 2015, the City of Springfield Fair Housing office, with the Springfield/Clark County Fair Housing Advocates, conducted a listening process with landlords, tenants and the organizations who work with both to address a variety of problems related to rental properties in Springfield. A summary of this process and recommendations is available in Appendix 8. This process led to three working groups, formed to address issues identified and implement solutions discussed. The first group focused on developing training for tenants. This group developed a three-hour tenant education certificate program which they have offered four times in 2016 and 2017 and are continuing the program into 2018. The program is coordinated by the City's fair housing coordinator, partnering with community housing organizations and addresses landlord concerns that tenants don't properly budget, pay their rent and take care of rental properties. The training addresses these concerns and also teaches tenants their fair housing and landlord-tenant rights and apprises them of community resources.

Another working group formed to address concerns of substandard rental properties. They discussed that if the City Commission were to enact rental licensing, accountability would improve the quality of rental property. This group, however, failed to follow through with action.

A third group planned to organize a support group for property managers in subsidized housing, to help them share ideas and build capacity. This group also has not yet followed through with their plans.

C. Focus Groups

The City of Springfield contracted with Harper Mack Consultants to conduct fair housing focus groups as part of this fair housing analysis. Eight groups were convened during December 2017 and January 2018. The eight groups were 1) individuals with disabilities, 2) Low-income families with children, 3&4) African-Americans, 5) Hispanics, 6) Muslim, 7) Housing Providers and 8) Lenders. The participants were asked to respond to a short survey and then they also participated in focus groups, discussing fair housing concerns and suggesting actions to address these concerns. Care was taken to engage a diverse group of people within each group as well.

In responses to a written survey, the participants indicated varying levels of knowledge of fair housing concerns. In many areas, about a third expressed concerns of discrimination and mistreatment. A summary of the responses is available on the Table 20 (page 37 of this analysis), with a break down by focus group available in the full report in Appendix 6.

The areas indicating the most concerns among participants were: discrimination in terms or conditions of rentals or sales (#6-60%), retaliation for reporting discrimination (#1-51%), racial steering (#5-45%) and familial status discrimination (#2-43%). On the other questions, well over half of participants either did not believe the problem is happening or said they didn't know. But still, there were participants concerned about discrimination against pregnant women (#3-17%), denial of housing available when it was available (#4-30%), mortgage loan discrimination (#7-24%), refusal of information about loans (#8-31%) and different loan terms imposed because of race.(#9-22%).

In addition to the written survey, the research compiled considerable anecdotal information from the focus groups. The researcher summarizes this data as follows:

"The problems and the recommendations identified by the eight Focus Groups' participants were coded and clustered around the major theme of education in most focus groups. Education was identified as a problem, and /or as a recommendation in numerous instances in several focus groups. The second problem, landlords, were

often included. Issues related to landlords included absentee landlords, abandoned houses, their use of discriminatory practices to deny certain people the right to rent or buy their homes, their refusal to provide a livable space for families and their creation of blighted homes in established neighborhoods, thereby lowering the value of those properties left in the neighborhood. These two themes are substantiated by the voices of the eight Focus Group participants.”

Recommendations for actions from the focus groups were:

- The emphasis of The Individual with Disabilities Focus Group discussion was primarily on Landlords and Substandard Housing, several recommendations were related to education and one recommendation was about transportation during the early morning, evenings and weekend.

- The attention of The Low-Income Families with Children Focus Group’s recommendations was heavily related to education, followed by recommendations for the landlord to perform his/her job with less discrimination and more responsiveness to the housing needs of the tenants.

- The efforts of the African Americans Focus Group 1 Focus Group’s recommendations were heavily related to education, followed by recommendations for the landlord to perform his/her job with less discrimination and more responsiveness to the housing needs of the tenants.

- The African American Focus Group 2 recommendations include education, followed by recommendations to regulate the role of landlords.

- The emphasis of the Muslim Focus Group recommendations included education, City funding to tear down abandoned property, investigate landlords when they are not maintaining their property, require tenant references, eliminate vacant lots in the neighborhoods.

- The Housing Providers Focus Group had a wide variety of recommendations to include but not be limited to: a concentration of speaking, writing and feeling positive about the City; Safety and Policing, Single or Multiple Hauler Contracts, Education, Beautification, Involve the community to make community decisions, HUD Regulations and Build Rental housing.

- Lenders focused on a range of recommendations to include: Gap Grants, Grant Programs, Several Education Programs, Debt, Loans, Land Bank Changes, Multi-Family Home Care for the Elderly Family Member.

In addition, participants were given a survey to ascertain to what extent they are aware of past actions by the fair housing office, and what actions they recommend for the future. Participants were asked to respond “Yes or No” to seven aspects of Fair Housing Outreach. See Appendix C of their report, p. 78-91 for a full report of this information (as recorded in Appendix 6 of this analysis).

An analysis of this data by the researcher states, “The number of focus group participants’ awareness of events and materials is considerably higher than the number of those who attend or know others who attend the events. Low attendance to these outreach events could be because the content appears to be specifically targeted toward a few agencies and programs. To encourage a greater number of participants, perhaps the educational events should be designed to attract a larger audience. For example, rather than developing a seminar for only head start parents, the events and seminars can be re-shaped to appeal to a much larger number of parents of pre-school or school age children. This would broaden the audience, increasing the number of people who will receive the information. Also, it would be advantageous to conduct an

evaluation at the conclusion of each program. This formative evaluation will give the City an immediate response to the success of any seminar and program and allow for immediate change if indicated. The data collected from the focus groups could be greatly supplemented, by obtaining this on-going data about the awareness and effectiveness of these Fair Housing events.”

Analysis: From these three listening processes, it is clear that there is a concern about discrimination in the Springfield community, including racial steering, and issues for many protected classes. Substandard housing creates problems for tenants and seeking more accountability for landlords is a problem that has gone unaddressed. Much can be improved with more education for both consumers and housing providers. There are a wide variety of solutions proposed by focus group members which should be further considered by the city.

IX Fair Housing Testing

Testing Summary

The City of Springfield maintains a contract with Miami Valley Fair Housing Center to conduct fair housing testing. They have conducted eight paired tests during each year of the five years under analysis. During this time period, they conducted 13 tests on disability status, 13 on race, 8 on familial status, 5 for national origin and 1 on sexual orientation. In 27 of these 40 matched tests, no evidence of discrimination was found (8 disability, 8 familial status, 8 race and 3 national origin). In two cases, although no discrimination was found, untrained property managers were not aware of the fair housing law, and had to ask the owner for advice. In six cases for disability status, some discrimination was found, in relationship to reasonable accommodations for assistance animals and one design issue. In seven cases, further testing was required to make a determination (6 race tests and 1 national origin). In addition there were five instances of disability discrimination based on reasonable accommodation issues and one on national origin discrimination. See summary table of tests from 2012-2016 in Appendix 9. 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. The biggest issue continues to be related to reasonable accommodation requests for assistance animals, with some concern on national origin and race, although they did not clearly identify racial discrimination. The City continues to conduct fair housing education to housing professionals and consumers to educate concerning rights and responsibilities.

Miami Valley Fair Housing Center continues to test and will provide enforcement when complaints are indicated. In the past five years, they have pursued administrative complaints with OCRC and HUD pursuant to their tests. Following is a summary of their actions and resolutions:

Cases pursued by Miami Valley Fair Housing related to City of Springfield Testing (2012-2016)

2012 (Based on 2011 tests) – Reported January 2013

Familial Status OCRC complaint v Recoleta, LTD, owner of 528 W. High St. (Test 1065) Outcome: Housing provider required to take fair housing training and to compensate MVFHC

Reasonable Accommodation OCRC Complaint v. Kathryn Rigel, owner of 1402 W. Pleasant St. (Test 1068) Probable cause of denying emotional support animal. Referred to Attorney General for resolution. Resolved in 2013 with housing provider agreeing to fair housing training, and compensation to MVFHC

Reasonable Accommodation OCRC Complaint v. Essie Roark, the owner of 2148 Boda St., (Test 1126) denial of emotional support animal. Resolved in 2013 with Housing provider agreeing to fair housing training, notices to tenants regarding reasonable accommodations and compensation to MVFHC.

2013 (Based on previous tests) – Reported January 2014

Reasonable Accommodation Administrative housing Discrimination complaint v Stephen Ackley, owner of 265 N. Western (Test 1228), denial of a support animal. Housing provider agreed to fair housing training, notices to tenants regarding reasonable accommodations and compensation to MVFHC.

2014 (based on previous tests) – Reported January 2015

Reasonable Accommodation administrative housing discrimination case v. Douglas Haney, owner of 613B Villa Road (Test 1326), denial of reasonable accommodation for an emotional support animal. Housing providers agreed to fair housing training, notices to tenants and compensation to MVFHC

2015 (based on previous tests) – Reported January, 2016

Filed Accessible Design and Construction Violations administrative housing discrimination complaint v. Mid Ohio Development Corporation (Test 1421) re accessible design and construction violations. Negotiations pending.

2016 (based on previous tests) – Reported December 2016;

Accessible Design and Construction Violations v. Mid Ohio Development Corporation (Test 1421) re accessible design and construction violations. Resolved with housing provider completing specific interior and common area retrofits and compensation to MVFHC.

Reasonable Accommodation administrative housing discrimination case v. Jane Horn, owner of 802 E. Cecil St. (Test 1522) for denial of reasonable accommodation request for an emotional support animal. Resolved with housing provider agreeing to fair housing training, notices to tenants re reasonable accommodations and compensation to MVFHC.

X Fair Housing Complaints

A listing of fair housing complaints made from the City of Springfield in 2013-2017 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 13 complaints were made, although the data may have been incomplete, because it did not include any 2017 cases. These complaints were made on the basis of the following protected classes: Disability Status (7), Race (1), Familial Status, (2), Retaliation (2), Religion, (1) Sex (1), National origin (1). The disposition of these cases is as follows. Cases dismissed due to findings of no cause included two disability cases, one case alleging race and familial status and another alleging sex, disability and retaliation. Cases withdrawn after resolution included one disability case, one case involving disability and retaliation and a third involving national origin and religion. Three cases were conciliated with a settlement, which included three disability cases. Another disability case was dismissed for lack of jurisdiction. A final disability case was charged or FHAP caused.

The Ohio Civil Rights Commission also provided a listing of cases closed during the reporting period (2013-2017). They reported on 35 cases, which included 20 alleging handicap discrimination, 10 race, 9 familial status, 3 gender, 3 retaliation, 2 religion, 2 national origin and one age. Of these cases, those closed without benefits or withdrawn included: issues of handicap status (3), familial status (3) and race (1). Those causes which were dismissed due to no cause findings included cases involving handicap status (8), race (7), Familial status (4), gender (3) and retaliation (2).

With the other cases, two were conciliated which included one familial status complaint and one handicap status complaint. One case was closed because a legal case was filed involving handicap status. Eight cases were settled with benefits, which included: 4 handicap status cases, 3 familial status cases and some which included religion, national origin, age, race and retaliation. (Several cases had more than one protected class).

There were also four cases which were withdrawn with benefits. These included three handicap status complaints and one religion and national origin complaint.

Analysis: With the Ohio Civil Rights cases closed, 21 of 36 were closed without cause or dismissed. However, these cases aren't necessarily without merit. The fair housing office has noticed over the years, that it can be difficult to prove discrimination, even when it is occurring. It's significant that only one of the race cases went on to a cause finding, conciliation or benefits and that was a white person alleging racial discrimination.

On the other hand, the handicap and familial status cases were more likely to be settled with benefits, including cases involving national origin/religion, and retaliation issues.

This seems to indicate that housing providers need more education on the fair housing law, especially including handicap and familial status, and also retaliation, race, national origin, and religion.

The small number of complaints may also indicate lack of awareness of the fair housing rights and/or fear of retaliation.

See Appendix 5 for copies of the lists of complaints provided by HUD and OCRC.

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 10

In addition, there was a concern in the last Analysis of Impediments to Fair Housing of discrimination with the LBGT community. On January 30, 2018, the Springfield City Commission amended the City's codified ordinance related to civil rights, adding sexual orientation as a protected class, inclusive of sexual orientation and gender identity. A copy of this commission action is attached in Appendix 11.

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 12.

D. Affirmative Marketing Plan

The City of Springfield has adopted an affirmative marketing plan for its housing programs. (See Appendix 13). 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, housing loans are available through the City for owner-occupied housing repairs to low income residents with incentives for seniors 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. They look 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. 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. However, there is a need for an updated Housing Market Analysis and the City Commission has included this as an objective for 2018.

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, an environmental concern particularly in households with children 6 years of age and younger.

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. The City applied 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 had 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 was to make lead-safe housing for young children and to provide lead skills training and outreach activities. But, after many years of addressing lead paint hazards, it became difficult to continue to address the problems as the grant requirements changed, and as so many of the units had been addressed. In 2017 the city completed its final Lead Grant, but continues to provide information to community related to lead-based paint issues and addresses the problem through their housing rehabilitation program as part of their projects.

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.

XII City of Springfield Fair Housing 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 2103 Analysis of Impediments to Fair Housing in her annual plans. See attached General Performance Reports for 2013-2017 (Appendix 14).

To what extent have impediments to fair housing been lessened or eliminated? That is difficult to ascertain.

In terms of impediment #1 racial segregation and steering, there continues to be improvement as minority dispersion throughout the city increases. And still in our listening processes, there are concerns that racial steering is still happening and it's clear that racial segregation has not been eliminated.

Related to impediment #2 and discrimination against the Hispanic population, it appears that the situation is not improved, based on information from Hispanics in focus groups and with those who work with them in the schools. The fair housing office provides materials in Spanish and makes efforts to do outreach. Seminars and tables have been provided in the past five years at a church with a large Hispanic population, at a workplace with a high percentage of Hispanic employees and also in the City school's Hispanic program office. But because of current immigration policies, and the reality that many of our local Hispanics are not documented, their fear keeps them from exercising their fair housing rights. Often they will not even attend workshops and seminars offered.

Related to persons with disabilities, the city continues to work to educate the housing providers with annual fair housing training, attended by Realtors and many property managers for large apartment complexes. Reaching "ma and pa" landlords continues to be an issue. Testing indicates that housing providers are still not all aware of this aspect of the law. The fair housing coordinator also provides information and referral to help housing consumers request reasonable accommodations and modification. The fair housing coordinator includes this segment in the tenant education seminar and the trainers at the annual fair housing stress this as well. We see some improvement, but it continues to be an area of needed education. A new issue raised in the focus groups for the disabled population is the substandard rental housing in which many of them live, and the unwillingness of the landlords to address issues of repairs needed.

Related to discrimination against African-Americans, although our testing by Miami Valley Fair Housing has not detected unequal treatment, informal reports continue to suggest we have a problem. The city fair housing office gets some complaints and continues to educate both housing consumers and providers on rights and responsibilities in this area.

Likewise, focus groups suggest familial status discrimination is still a problem, but testing conducted by Miami Valley Fair Housing has not detected this problem, and very few complaints are made in this area.

Substandard rental housing continues to be a growing problem in the city due to the aging property stock, the recent foreclosure crisis and disinvestment. Years of neglect of rental properties contribute to the problem. The city worked to address this problem with the landlord-tenant-organization process, but the group which wanted to request rental licensing did not move forward with action. In the focus groups conducted in the past two months, this continues to be a problem. The city fair housing coordinator regularly explains rights to tenants and refers people to code enforcement and rent escrow processes, but these programs are not solving the situation. The city offers mediation, as well.

In terms of fair lending, there continues to be some concern. The city has worked with community partners to promote homeownership through providing housing fairs in the community each year, to educate people about available programs to help address credit and overcome barriers to home ownership. In the aftermath of the foreclosure crisis, housing sales declined, but they are improving again. Minorities continue to be less likely to apply for loans and more likely to be denied, although the situation seems to be improving. The foreclosures are still high, although less than half of what they

were during the previous analysis. Credit tightened, so they are less common with new loans.

Fair housing education has continued in the past five years, with the new tenant education training added and housing fairs dispersed to various community locations. But it appears there is still much need and request for training for both housing providers and consumers.

The risk of lead-based paint for young children has not gone away. Although the city did address many problematic structures, there are still many more, with no further resources to address the problem. The fair housing office continues to provide information and referral and lead-safe booklets to educate about what parents can do.

Retaliation continues to be an issue, according to the focus group report, and also based on complaints filed. The city has created a flyer on this topic and addresses it in seminars.

The city has not heard of complaints of discrimination against veterans or active military during the reporting period, but has provided fair housing information to the veteran's office.

The LGBT community continues to assert that they have issues of discrimination in Springfield. The Human Relations Board also uncovered this problem in their survey and community forums. They then proposed that the City Commission take action to add sexual orientation to the city code. Although the commission voted 3-2 against doing so in the past, after elections in November, the new commission voted 4-1 to enact such legislation, which ushers in an improvement for LGBT citizens.

After conducting this analysis, it appears that the impediments to fair housing remain somewhat improved, but relatively the same.

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 Active Military and Veteran's Concerns

Military 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.