

The State of Fair Housing
in Northeast Ohio:
April 2013

Special Edition
Honoring the
Housing Research & Advocacy Center's
30th Anniversary

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Acknowledgments

We wish to thank the U.S. Department of Housing and Urban Development (HUD) for the data they provided regarding housing complaints. In addition, we would like to thank local government officials for answering questions about and providing copies of fair housing ordinances which we have analyzed in this report.

About the Housing Research & Advocacy Center

The Housing Research & Advocacy Center (the "Housing Center") is a 501(c)(3) non-profit organization whose mission is to promote fair housing and diverse communities, and work to eliminate housing discrimination in Northeast Ohio, by providing effective research, education, and advocacy. In addition to addressing traditional issues of housing discrimination and segregation, the Housing Center also provides analysis of subprime and predatory lending practices and trends in the region.

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Reflections on Opening Doors for 30 Years

Hilary Mason King, Executive Director, Housing Research & Advocacy Center

The fair housing movement has made a difference over the last 30 years, but we still have hearts and doors to open to fulfill the promise of the Fair Housing Act which celebrates its 45th anniversary this year.

The Housing Research & Advocacy Center has evolved over the decades and works with a growing community of supporters through the Northeast Ohio Fair Housing Collaborative, the Fair Housing for Arabs and Muslims Advisory Board, and other important partnerships. Better use of technology, greater community outreach, and research informed enforcement are all tools we use to meet the growing sophistication of discriminatory housing and lending practices. Fair housing is not an isolated issue; it is touched by our history of discrimination and the cumulative impact of housing, lending and insurance practices, as well as the inequitable distribution of community services. Housing discrimination often is not as apparent as it once was, but it is still as real and as damaging. Engaged partnerships, appropriate methods, and open dialogue are essential to opening doors for everyone.

The disparate impact of lending practices has resulted in a tragic loss of equity in communities of color. The resulting “segregation tax” on these communities may be an insurmountable threshold, possibly for generations to come. Families with children and people with disabilities, particularly mental health disabilities, experience increasingly higher rates of discrimination often because they are not aware that the Fair Housing Act offers protections for this basic civil right.

Federal regulations and legislation, such as the Disparate Impact Rule, the Community Reinvestment Act, and the Home Mortgage Disclosure Act, can help on the regional level. Local communities have taken steps to promote fair housing through ordinances that add additional protected classes – sexual orientation, gender identity, marital status, age, and source of income; as well as responsible banking ordinances. But, more need to join these efforts and the laws must be vigorously enforced. Visitability and universal design are recognized as important movements toward accessibility and the viability of communities with aging housing stock, but not enough communities have embraced these approaches to meet the increasing demand. Coordinated efforts, multidisciplinary partnerships, and an engaged regional dialogue can help clear the way.

Housing choice promises more than housing 45 years after the passage of the Fair Housing Act. It promises access to all of the elements of a fulfilled life including education, healthcare, banking, social and cultural opportunities, and employment. As we step forward with our partners, the Housing Research & Advocacy Center is committed to providing the best research, education, advocacy, and enforcement we can to ensure fair housing and fair lending for all.

Patricia Burgess, former President of the Board of Directors of the Housing Center

I grew up in the 1950s and ‘60s in Stark County, Ohio, in a fairly modest development a mile or two east of the city of Massillon. While fairly young I realized that no African Americans lived in our neighborhood. An older child – perhaps my sister or brother – explained to me that African Americans didn’t live in our neighborhood because they weren’t allowed to buy houses there.

Jews were also not permitted to buy in our neighborhood. But those who lived on our end of our street knew of the exception: a divorced Jewish mother of three daughters. However, at the time they moved in, the mother had been married to her Irish Catholic husband. After the divorce, he left, she kept the house, resumed her maiden name – which her daughters also took – and resumed active practice of the Jewish faith (as did her daughters). All this information got filed away in my brain as a child.

In the mid-1980s I was working on a Ph.D. A very supportive faculty committee had worked to get approval for my One-of-a-Kind, Interdisciplinary Ph.D. in History and City and Regional Planning. This would allow me to apply an historical perspective to all my planning knowledge and explore bigger questions about housing choice and neighborhoods.

I knew that zoning had often been damned for racially segregating and economically stratifying cities. There was case law and anecdotal evidence to that effect. But there was no longitudinal study showing how the systematic application of zoning had produced the segregated stratified city. Doing such a study became my goal.

When I performed a trial run of my methodology I discovered that lo-and-behold, the racially segregated, economically stratified neighborhoods predated the development of zoning. They were a product of covenants that those who developed and subdivided the land had inserted into the deeds decades earlier. As early as the 1900s and 1910s two or three developers who worked on a large scale decided which parts of the city would have neighborhoods for wealthy whites and which would have neighborhoods for other folks. Zoning merely cemented this system into place. This system affected who knew or associated with whom, who attended which schools, and who had access to public transportation and jobs.

Reading dozens of deeds for each of hundreds of subdivisions I was struck again and again. Minimum lot size, minimum setbacks, minimum square footage for houses to be built, that there be no one-story houses – all these provisions ensured that those who moved there would be above a certain income level. Prohibitions against “foreigners,” Italians, Jews, and African-American, among others, ensured racial, ethnic, or religious segregation. Had I been alive those decades earlier only the economic restrictions would have applied to me, yet each time I read any of the restrictions it was like being slapped repeatedly in the face.

The research became my dissertation, which earned me the Ph.D. It also became the basis for a couple articles in academic journals, and eventually a book. And the book became the basis for my being promoted and granted tenure at Iowa State in the mid-1990s. A combination of things brought me back to Ohio and led to a career change. I went to law school, finishing in 2002. Through a friend at my law firm I connected with Business Volunteers Unlimited. And through BVU, I connected with this fair housing agency called the Housing Research & Advocacy Center. The specifics are different but there are still obstacles to people living where they might choose. The Housing Center works to combat them.

Things have changed since my 1950s Stark County childhood, and my 1980s doctoral work. I don't do the research anymore. But I remember my child's puzzlement about why some people didn't live in our neighborhood. Looking backwards I can trace a long thread, decade by decade, from Massillon, Ohio, to the Housing Center. I might not have a child's sensitivity or puzzlement, but it still isn't right that “they don't live here.”

Diane Citrino, Thacker & Martinsek

Pursuing justice on behalf of clients is why I dreamed of being a lawyer. Fighting for families, individuals and fair housing organizations against segregation and housing discrimination has made my legal career rewarding. Helping a woman who gave birth in her car in December because she was unfairly evicted, or a woman sexually assaulted by her landlord fight back, has given me tremendous satisfaction. Many of my clients are fair housing organizations who work tirelessly to make buildings accessible, advance the interests of people who experience discrimination, combat unlawful advertisements for housing, and in a myriad of ways deliver on the promise of a society where living patterns are truly integrated. Housing Research & Advocacy Center now, and under its earlier name Metropolitan Strategy Group, has been a valued client of mine and allowed me to work with them to make change happen through our legal system. Being part of that fight for a United States that is more fair in its housing has given me

meaningful work, great colleagues in the cause, and amazing clients. Congratulations on your 30th anniversary and on continuing the pursuit of housing justice.

Jeffrey Dillman, Co-Director of Fair Housing, Legal Aid of North Carolina, former Executive Director of the Housing Center

Although it was written in reference to journalists, Finley Peter Dunne's adage applies equally well to the work of the Housing Research & Advocacy Center: to comfort the afflicted and afflict the comfortable. For three decades, the Housing Center has assisted those who have been denied housing and worked to ensure that landlords, property managers, lenders, and others not only understand but follow their obligations under the law. At times, the goal of achieving diverse and thriving communities can seem overwhelming, the pace of change glacial. And too often the daily news serves to promote cynicism and inaction. But it is important to remember that together, we have made progress. And for the individuals the Housing Center has assisted over 30 years – and the community at large – that progress has helped provide comfort. Whether it involves being able to buy a house, rent an apartment, obtain a fair loan, or receive an accommodation to for a disability, the work of the Housing Center has provided a small step towards a more just society while also reminding the comfortable of their obligations to the greater community. In directing the Housing Center for six years, I had the privilege of working with a team of dedicated colleagues, Board members, supporters, and friends who not only had a vision of a better community but also the commitment to work towards it. Congratulations on 30 years of work.

Mike Piespney, Executive Director of Environmental Health Watch

The fight for social justice matters. When contemplating what I would write to describe my fifteen years working with the Housing Research and Advocacy Center, these six words were enough. As the former executive director of the Cleveland Tenants Organization, often, I would find a low-income family, unable to find safe, decent & affordable housing - not due to poor credit, or a past eviction history - but due to the fact that they had children, or because of the color of their skin, or because of a disability. Every time, when my clients needed additional assistance to face their fair housing issues, the Housing Center stepped up to assure that my clients became our clients. We worked hand-in-hand to help those most in need.

As executive director of Environmental Health Watch, I am proud to announce that we are now in the planning stages of a new partnership with the Housing Research & Advocacy Center. Our collaborative effort will allow us to address a broader range of housing issues – from mold and moisture issues and lead-based paint, to energy efficiency and accessibility. Together, our “one touch” approach will help assure that families living throughout Greater Cleveland will have safe, decent, affordable, and accessible housing for generations to come. Why? Because when you help someone, it's very clear - social justice matters. Congratulations on your 30th anniversary.

Reverend Hilton Smith, President of the Cleveland NAACP

Housing is a civil right. Fair housing is the ultimate goal to protect the fundamental rights of individuals, including the right to access housing free from discrimination, the right to access credit on an equal basis.

The concept of fair housing holds that no one should suffer unequal treatment, regardless of race, gender or disability. Fair housing creates a national movement to enable people to feel and realize the American dream. The rights to fair housing allow people to say, “I too am America.”

A Brief History of the Housing Research & Advocacy Center's 30-Year Existence

The 1980s: Fighting for Fair Housing

In early 1983, a group of civil rights, fair housing, and community activists from Greater Cleveland met to discuss issues related to neighborhood integration, fair housing, and fair lending. The meeting proved fruitful, and more followed. Later that year, the brown bag lunch group had decided that the best way to address housing discrimination was to form a nonprofit organization.

The Metropolitan Strategy Group (MSG) coalesced under the leadership of Charles "Chip" Bromley, a Cleveland native who dealt with housing discrimination and housing access in the 1970s as a community organizer for Heights Community Congress and as head of the Bedford Heights Civic Coalition. Initially, MSG sought to lobby at the local, state, and federal levels for greater access to housing throughout Greater Cleveland and for more robust fair housing laws. In order to promote fair housing, MSG promoted a package of tools that included financial incentives, affirmative marketing, education, and establishing relationships with real estate professionals. MSG also acted as a resource for services and information for other activists and groups involved in housing issues.

The 1990s: Expanding Services

Although the 1980s saw success in establishing a network of fair housing and related organizations, concern soon grew over coordination and effective interaction with government entities. MSG responded by organizing a series of fair housing forums. These informal monthly gatherings brought together housing advocates, real estate professionals, government officials, and concerned citizens to discuss a range of housing issues. Forum topics included affordable housing, neighborhood integration, foreclosures, predatory lending, the Community Reinvestment Act, and Government Sponsored Enterprise (GSE) lending. These forums attracted speakers from federal, state, and local government, as well as fair housing activists from across the country. In 1990, MSG served as the local co-sponsor for the National Federation for Neighborhood Diversity's annual national conference, held at Case Western Reserve University.

MSG also increased its investigative activities in the 1990s. In 1992, MSG instituted a comprehensive testing program that sought to uncover housing discrimination within the Northeast Ohio housing market. Testing proved an effective method for collecting evidence for fair housing complaints. In 1997, the MSG settled its first federal court case, which dealt with disparate treatment for disabled tenants.

Expanding the network of organizations and collaboration continued in the 1990s as MSG and the Cleveland Tenant's Organization launched Greater Clevelanders for Fair Housing, a group that worked with suburban municipalities to produce fair and affordable housing policies and programs. In 1996, MSG teamed with two other Ohio housing groups to form the Ohio Community Reinvestment Alliance, which sought to influence banks to increase lending activity in low-income neighborhoods. The Alliance was successful in using the Community Reinvestment Act to challenge bank mergers in 1996 and 1998 and worked with those banks to establish programs that led to increased lending opportunities for residents in low- and moderate-income neighborhoods. MSG also successfully settled a case against a mortgage company that targeted women for predatory loans.

The 1990s saw MSG expanding its research capacity in order to produce reports that provided support for fair housing advocacy. In 1996, the MSG took advantage of emerging mapping technology that found GSE disinvestment in central city neighborhoods in Ohio's largest metropolitan areas. This report influenced Fannie Mae and Freddie Mac to provide more non-conforming loans in the Cleveland area. As an early adopter of these methods, MSG was able to provide training and technical assistance to other fair housing organizations in Ohio and neighboring states.

An increased focus on research proved valuable in the late 1990s as the MSG highlighted the troubling rise of predatory and subprime lending in the Cleveland area. In 1999, the MSG held a forum on predatory lending practices and produced a report showing subprime lenders targeting predominantly African-American neighborhoods in the Cleveland area.

2000-Present: A New Name, New Leaders, But Focus on Fair Housing Remains

Two significant changes to the MSG came in the early 2000s. In 2002, the organization moved its office from Cleveland Heights to Cleveland. In 2003, MSG changed its name to the Housing Research & Advocacy Center (the Housing Center) in order to better reflect the organization's mission.

In 2005, Jeffrey Dillman replaced longtime Executive Director Chip Bromley. Dillman helped establish the Greater Cleveland Fair Housing Consortium, which allowed those engaged in fair housing and related activities to meet and discuss important issues. During his time at the Housing Center, Dillman testified before the Ohio Legislature and the Federal Reserve Board of Atlanta on fair housing and fair lending issues, and oversaw an expansion of the Housing Center from three full-time employees to five.

Throughout the 2000s, the Housing Center also found it important to focus on the emerging issue of payday lenders by collaborating with Policy Matters Ohio on two reports that influenced Cleveland's City Council to limit the number of payday lenders in the city.

The Housing Center also expanded its fair housing outreach and education efforts. Collaborating with county governments in Northeast Ohio, the Housing Center hosted seminars, conferences, workshops, and forums for both real estate professionals and consumers. As the number of fair housing complaints from physically and mentally disabled residents grew, the Housing Center responded by crafting outreach and education efforts that specifically addressed those groups. Moreover, the Housing Center settled a major housing discrimination suit with a Cleveland developer and architect who agreed to make units accessible to persons with disabilities. The Housing Center was recognized for its contributions by Greater Cleveland Community Shares which named it the Social Justice Organization of the Year.

In 2011, Hilary Mason King was named the Housing Center's new Executive Director, replacing Jeffrey Dillman. In her first year as Executive Director, King expanded the Housing Center full-time staff from five to eight. She worked with partners to enhance the role of the Greater Cleveland Fair Housing Consortium which became the Northeast Ohio Fair Housing Collaborative. A new consumer education booklet "Obtaining and Maintaining Housing: Fair Housing for People with Mental Health Disabilities" launched a new community education initiative and is requested by organizations and individuals throughout Ohio. The Housing Center expanded community outreach by creating street teams of staff and volunteers who attended over 25 festivals and community events to provide information and education about fair housing and the services offered by the Housing Center. The Housing Center's inaugural "Rock the Block" fundraising 5k walk-run-roll took place in Edgewater Park.

In late 2012, the Housing Center moved from its location on Perkins Avenue to its current offices on 2728 Euclid Avenue in the Midtown neighborhood. Located on the Health Line, the new offices are more easily accessed by public transit.

The Housing Center enters its third decade ready to address existing and emerging fair housing issues by building on the foundation of its existing programs. It continues to track racial disparities in mortgage lending in Ohio, and is developing a manual of lending rights as a part of a comprehensive new housing and lending education and advocacy program. An additional initiative is a fun and informative outreach program that teaches school-age children about fair housing and civil rights. The Housing Center is now developing partnerships with local governments to address fair housing issues among Northeast Ohio's growing Muslim and Arab American population and to educate property owners on new accessibility and

visitability issues. In early 2013, the Housing Center introduced a new website and the Fair Housing Hotline, a dedicated phone number that allows residents to contact the Housing Center at any time with fair housing issues or questions.

No history of the Housing Center would be complete without a summary of systemic- and complaint-based testing and enforcement. Since 2000, the Housing Center has performed more than 3,000 tests for housing discrimination, filed and/or resolved more than 200 complaints, and educated more than 5,500 people on fair housing issues. No other fair housing agency in Northeast Ohio can offer the Housing Center's combined depth of experience in testing, enforcement, and research.

The Housing Center remains committed to building on this foundation to fulfill its mission to promote fair housing and diverse communities and to work to eliminate housing discrimination through effective research, education, and advocacy.

I. Executive Summary

Housing discrimination remains a problem in Northeast Ohio and in the United States. The level of discrimination that exists today, as well as the segregated housing patterns of our region, is a result of decades of official and unofficial policies of governments at all levels, of private businesses and associations, and of individual actions by homeowners, rental agents, and others. Without the actions of all of these individuals and entities, not only would we face less segregation and discrimination as a society, but there would be less economic stratification, as housing patterns affect not only where one lives but, in many respects, one's life chances through access to quality schools, transportation, jobs, and a healthy environment.¹

This report is the Housing Center's eighth annual comprehensive survey of fair housing in Northeast Ohio.² The report finds that 45 years after the passage of the federal Fair Housing Act – which prohibits discrimination based on race, color, religion, sex, national origin, familial status, and handicap – housing discrimination remains widespread in the region.

In 2012, there were 108 complaints of housing discrimination filed in Northeast Ohio with the U.S. Department of Housing and Urban Development (HUD). This number was a decrease from the 144 complaints filed in 2011 and the fourth consecutive year of decline, and is lower than the average number of complaints filed in the last 22 years (129). In the last five years for which data are available (2008-2012), an average of 185.4 complaints were filed, compared to an average of 139.8 complaints filed in the previous five-year period (2003-2007). This increase includes a 8.66% decrease in the number of cases based on race (from 242 to 221) and a 1.31% increase in the number of cases based on disability (from 229 to 232). In the 2008-2012 period, the number of cases brought based on familial status, national origin, religion, and sex/gender also increased compared to the previous five-year period. The most common bases of discrimination alleged in complaints filed in 2008-2012 were familial status (28.91%), disability (25.03%), and race (23.84%).

Although the increase in cases filed is significant, it is clear that it represents only a small fraction of the total number of instances of housing discrimination in the region. By examining moving patterns of different racial and ethnic groups and comparing this to discrimination rates found in a national study, the Housing Center estimates that there are annually at least 33,690 instances of housing discrimination in the region against African Americans, Hispanics/Latinos, and Asian Americans and Pacific Islanders.

The level of housing segregation has not improved or worsened for African Americans since 1990, with the region being the fifth-most segregated area in the country in both 1990 and 2010.

Some local communities have taken steps to address housing discrimination by passing local fair housing legislation. In Cuyahoga County, 38 governments have fair housing ordinances, compared to nine in Lorain County, four in Lake County, three in Ashtabula County, and three in Medina County. There are no local fair housing ordinances in Geauga County.

Although many of these statutes merely recodify federal and state law without offering additional protection to individuals, a number of the statutes also prohibit discrimination on other bases, thus providing protection to additional classes of people. The grounds protected by local ordinances (and the

¹ See Carr, James H. and Nandinee K. Kutty, eds., *Segregation: The Rising Costs for America* (New York: Routledge, 2008).

² For purposes of this report, we have examined a six-county region made up of Ashtabula, Cuyahoga, Geauga, Lake, Lorain, and Medina Counties.

number of jurisdictions providing such protection) include age (24 ordinances), marital status (21), creed (18), sexual orientation (13), disabled veteran status and Vietnam veteran status (5), ethnic group (5), gender identity (7), military status (8), military discharge status (1), occupation (1), parental status (1), source of income (3), and association with a protected class (1).

The Housing Center's recommendations are to:

- Enact stronger fair housing laws that prohibit discrimination based on additional grounds (such as source of income to prohibit discrimination against individuals who rely on housing subsidies);
- Restore Ohio fair housing law so that it is equivalent to federal fair housing law;
- Vigorously enforce fair housing laws at all levels. Include the use of systemic testing for Discrimination to identify individuals who violate the law and deter future violations;
- Strengthen the commitment of governments that receive federal funds to “affirmatively further fair housing;”
- Support and adequately fund the new federal Consumer Financial Protection Bureau to protect individuals from abusive and unfair products and services;
- Increase monitoring and investigations of mortgage lenders to ensure that they are providing fair access to credit and are complying with the Fair Housing Act and other anti-discrimination statutes to provide loans in a non-discriminatory manner;
- Implement comprehensive education efforts to ensure that individuals are aware of fair housing laws and the means available to enforce them; and
- Provide government incentives and other creative solutions to combat housing discrimination and racial and economic segregation.

II. Demographics of the Region

Fair housing laws provide protection from discrimination to all members of our society, not only members of racial or ethnic minorities. For example, the prohibitions on race discrimination prohibit discrimination not only against African Americans or other racial minorities but against *any* person on account of his or her race. Likewise, the provisions on religious discrimination prohibit not only discrimination against members of minority religions but adherents to any religion (as well as those who are not religious).

While every individual in our society therefore is provided with protection by fair housing laws, the history of discrimination in our country has demonstrated that members of minority groups – whether racial, religious, ethnic, national origin, or other – face discrimination most often and with the most severe consequences. Thus, the chances of a white individual facing racial discrimination are much lower than the chances of an African American (or Asian American) facing such discrimination. As such, we provide below an overview of the demographics of the region, with a focus on its racial and ethnic make-up, as well as the characteristics of the population protected by federal and state fair housing laws.

A. Region Covered

This report covers the state of fair housing in Northeast Ohio. For purposes of this report, the area consists of the counties of Ashtabula, Cuyahoga, Geauga, Lake, Lorain, and Medina. This area was chosen because until 2000, it represented the Metropolitan Statistical Area (MSA) used by the U.S. Census Bureau to describe the region.³

B. Population of the Region

From 1970 to 2010, the population of the area covered by this report has decreased by 9.94%, from 2,419,274 to 2,178,737, at a time when the population of the country as a whole increased 51.80%.⁴ Changes in county-level populations have varied from an increase of 108.34% for Medina County to a 25.63% decrease in Cuyahoga County.⁵

Table 1: Population of Region by County

| | 1970 | 1980 | 1990 | 2000 | 2010 | % Change 1970-2010 |
|-----------|-----------|-----------|-----------|-----------|-----------|--------------------|
| Ashtabula | 98,237 | 104,215 | 99,821 | 102,728 | 101,497 | +3.32% |
| Cuyahoga | 1,721,300 | 1,498,400 | 1,412,140 | 1,393,978 | 1,280,122 | -25.63% |
| Gauga | 62,977 | 74,474 | 81,129 | 90,895 | 93,389 | +48.29% |
| Lake | 197,200 | 212,801 | 215,499 | 227,511 | 230,041 | +16.65% |
| Lorain | 256,843 | 274,909 | 271,126 | 284,664 | 301,356 | +17.33% |
| Medina | 82,717 | 113,150 | 122,354 | 151,095 | 172,332 | +108.34% |
| Total | 2,419,274 | 2,277,949 | 2,202,069 | 2,250,871 | 2,178,737 | -9.94% |

Source: U.S. Census

Overall, the racial makeup of the six-county region has become more diverse over the past 40 years. During this time period, the percentage of population that is white has decreased from 85.0% in 1970 to

³ In 1990, this area comprised the Cleveland-Elyria-Lorain Metropolitan Statistical Area (MSA). In 2000, the Census Bureau modified the MSA to remove Ashtabula County and renamed the region as the Cleveland-Elyria-Mentor MSA. We have included all six counties in this report to allow a comparison over time of the demographics, as well as the fair housing complaints, in the region.

⁴ See U.S. Census Bureau, "Table 1. Population: 1790-1990," *1990 Census of Population and Housing*; U.S. Census: 2010.

⁵ For data sources for all tables and charts, see Appendix E.

74.9% in 2010. The percentage of African Americans has increased in this period from 14.6% to 19.3%, while the number of Asians and Pacific Islanders has tripled from 0.6% in 1980 to 1.9% in 2010.

Table 2: Race of Population in Region⁶

| | 1970 | | 1980 | | 1990 | | 2000 | | 2010 | |
|-----------------------------------|-----------|------|-----------|------|-----------|------|-----------|------|-----------|------|
| | Number | % | Number | % | Number | % | Number | % | Number | % |
| White | 2,056,236 | 85.0 | 1,869,554 | 82.1 | 1,772,782 | 80.5 | 1,731,562 | 76.9 | 1,632,423 | 74.9 |
| African American or Black | 352,757 | 14.6 | 368,519 | 16.2 | 379,987 | 17.3 | 417,044 | 18.5 | 420,114 | 19.3 |
| American Indian and Alaska Native | NR | NR | 2,625 | 0.1 | 3,972 | 0.2 | 4,121 | 0.2 | 4,297 | 0.2 |
| Asian and Pacific Islander | NR | NR | 14,460 | 0.6 | 22,357 | 1.0 | 31,209 | 1.4 | 41,317 | 1.9 |
| Two or more races | NR | NR | NR | NR | NR | NR | 34,932 | 1.6 | 44,276 | 2.0 |

Source: U.S. Census

According to the Census Bureau, the Hispanic/Latino population of the region increased from 1.8% in 1980 to 4.7% in 2010, with Lorain County (8.4%) and Cuyahoga County (4.8%) having the highest percentages.

Table 3: Hispanic or Latino/a Population.⁷

| | 1980 | | 1990 | | 2000 | | 2010 | |
|-----------|--------|---------|--------|---------|--------|---------|---------|---------|
| | Number | Percent | Number | Percent | Number | Percent | Number | Percent |
| Ashtabula | 1,119 | 1.1 | 1,538 | 1.5 | 2,292 | 2.2 | 3,441 | 3.4 |
| Cuyahoga | 24,028 | 1.6 | 31,447 | 2.2 | 47,078 | 3.4 | 61,270 | 4.8 |
| Geauga | 305 | 0.4 | 294 | 0.4 | 538 | 0.6 | 1,001 | 1.1 |
| Lake | 1,098 | 0.5 | 1,469 | 0.7 | 3,879 | 1.7 | 7,825 | 3.4 |
| Lorain | 13,124 | 4.8 | 15,261 | 5.6 | 19,676 | 6.9 | 25,290 | 8.4 |
| Medina | 489 | 0.4 | 711 | 0.6 | 1,399 | 0.9 | 2,747 | 1.6 |
| Total | 40,163 | 1.8 | 50,720 | 2.3 | 74,862 | 3.3 | 101,574 | 4.7 |

Source: U.S. Census

The percentage of foreign born population in the region (who would be protected under fair housing laws based on the prohibition of discrimination based on national origin) was 5.5% for the region in 2010, up

⁶ Notes: NR = not reported. In 1970, the only racial categories listed for total county populations were "White" or "Negro." In 1980 and 1990, the Census Bureau added "American Indian, Eskimo and Aleut" and "Asian and Pacific Islander." In 2000, the Census Bureau reported "Asian" separate from "Native Hawaiian and other Pacific Islander." For this table, these two categories were combined to allow for easier comparison to 1980 and 1990, when the Census Bureau reported them in one category, and because of the relatively small number of individuals in these groups in Northeast Ohio. This chart does not include individuals who reported "Other races" in any of the years. Racial data for each of the six counties in this report are provided in Appendix A.

⁷ According to the Census Bureau, "Hispanic" and "Latino" are not racial designations, and individuals may be of any race. The Census Bureau did not report the number of "Hispanic" or "Latino" individuals on a county-wide basis in 1970.

slightly from the rate of 5.1% in 2000. The lowest rate was 1.6% in Ashtabula County, and the highest rate was 7.0% in Cuyahoga County.

Table 4: Percent of Population that is Foreign Born.

| | 2000 | | 2010 | |
|-----------|---------|---------|---------|---------|
| | Number | Percent | Number | Percent |
| Ashtabula | 1,619 | 1.6 | 1,667 | 1.6 |
| Cuyahoga | 88,761 | 6.4 | 90,526 | 7.0 |
| Geauga | 2,553 | 2.8 | 1,646 | 2.8 |
| Lake | 9,746 | 4.3 | 12,099 | 5.3 |
| Lorain | 7,396 | 2.6 | 8,492 | 2.8 |
| Medina | 4,550 | 3.0 | 5,373 | 3.2 |
| Total | 114,625 | 5.1 | 119,803 | 5.5 |

Source: U.S. Census

In response to widespread discrimination against families with children, Congress amended the Fair Housing Act in 1988 to prohibit discrimination based on familial status.⁸ In 2010, 29.9% of households in the region contained an individual under 18 years of age, ranging from a low of 28.4% in Cuyahoga County to a high of 35.3% in Medina County. In 2010, the percentage of households with individuals under 18 decreased in every county compared to 2000, reflecting the increasing age of the population.

Table 5: Households with Individuals Under 18.

| | 2000 | | 2010 | |
|-----------|---------|------|---------|------|
| | Number | % | Number | % |
| Ashtabula | 14,014 | 35.6 | 12,316 | 31.3 |
| Cuyahoga | 180,906 | 31.7 | 154,582 | 28.4 |
| Geauga | 12,339 | 39.0 | 11,515 | 33.6 |
| Lake | 29,800 | 33.2 | 27,686 | 29.4 |
| Lorain | 39,218 | 37.1 | 37,908 | 32.6 |
| Medina | 21,771 | 39.9 | 22,966 | 35.3 |
| Total | 298,048 | 33.4 | 266,973 | 29.9 |

Source: U.S. Census

The 1988 amendments to the Fair Housing Act also prohibited discrimination based on handicap. In 2010, 11.2% of the population between the ages of 18 and 64 were disabled, with a low of 7.4% in Geauga County and a high of 12.6% in Ashtabula County. For people 65 years of age and older, 36.4% of the population in the region was disabled, with a low of 28.1% in Geauga County and a high of 38.3% in Cuyahoga County. Among individuals under 18 years, 4.1% were disabled, with a low of 3.3% in Medina County and a high of 5.4% in Cuyahoga County.

⁸ The Fair Housing Amendment Act of 1988 became effective March 12, 1989. Pub. L. No. 100-430.

Table 6: Population with a Disability in 2010.

| | Under 18 years | | 18 to 64 years | | 65 years and over | |
|-----------|----------------|---------|----------------|---------|-------------------|---------|
| | Number | Percent | Number | Percent | Number | Percent |
| Ashtabula | 1,247 | 5.1 | 7,486 | 12.6 | 5,345 | 35.9 |
| Cuyahoga | 15,771 | 5.4 | 94,440 | 12.0 | 72,424 | 38.3 |
| Geauga | 826 | 3.4 | 4,068 | 7.4 | 3,643 | 28.1 |
| Lake | 1,838 | 3.6 | 12,871 | 9.1 | 11,366 | 32.1 |
| Lorain | 3,644 | 5.0 | 20,943 | 11.6 | 14,733 | 36.8 |
| Medina | 1,439 | 3.3 | 9,007 | 8.6 | 6,601 | 31.0 |
| Total | 21,125 | 4.1 | 148,815 | 11.2 | 114,112 | 36.4 |

Source: U.S. Census

In addition to prohibiting discrimination based on handicap, the 1988 amendments to the Fair Housing Act also required that certain new multifamily housing be constructed with certain accessible features to ensure that people with disabilities have more housing options. While single-family housing is not required to meet these accessibility standards, newer single-family homes tend to be more accessible to individuals with mobility or other physical challenges than older homes. Thus, the age of housing in a region is often an indication of the amount of housing that is potentially more accessible to these individuals. In Northeast Ohio, 1.9% of the housing stock overall was built from 2005 or later, ranging from a low of 1.2% in Cuyahoga County to a high of 4.1% in Medina County. Additionally, 52.9% of the housing in the region was built prior to 1960, with a low of 23.6% for Medina County to a high of 62.5% for Cuyahoga County. Visitability and universal design can improve the accessibility of older single family homes.

Table 7: Year Housing Built in the Region, 2010.

| Year Built | Ashtabula | | Cuyahoga | | Geauga | | Lake | | Lorain | | Medina | | Total | |
|-----------------|-----------|-------|----------|-------|--------|-------|---------|-------|---------|-------|--------|-------|---------|-------|
| | # | % | # | % | # | % | # | % | # | % | # | % | # | % |
| 2005 or later | 762 | 1.7 | 7,257 | 1.2 | 889 | 2.5 | 2,605 | 2.6 | 4,796 | 3.8 | 2,786 | 4.1 | 19,095 | 1.9 |
| 2000-2004 | 2,763 | 6.0 | 15,993 | 2.6 | 2,735 | 7.5 | 5,003 | 5.0 | 11,027 | 8.8 | 8,330 | 12.3 | 45,851 | 4.6 |
| 1990-1999 | 4,916 | 10.7 | 32,353 | 5.2 | 5,902 | 16.3 | 12,259 | 12.2 | 14,016 | 11.2 | 14,828 | 21.9 | 84,274 | 8.4 |
| 1980-1989 | 2,629 | 5.7 | 33,149 | 5.3 | 4,474 | 12.3 | 10,147 | 10.1 | 7,956 | 6.3 | 6,724 | 9.9 | 65,079 | 6.5 |
| 1970-1979 | 6,415 | 13.9 | 61,326 | 9.8 | 6,788 | 18.7 | 17,537 | 17.5 | 20,388 | 16.2 | 13,524 | 19.9 | 125,978 | 12.6 |
| 1960-1969 | 4,166 | 9.0 | 83,258 | 13.4 | 4,012 | 11.1 | 15,116 | 15.1 | 17,220 | 13.7 | 5,614 | 8.3 | 129,386 | 13.0 |
| 1950-1959 | 5,972 | 13.0 | 128,246 | 20.6 | 5,333 | 14.7 | 19,917 | 19.8 | 21,148 | 16.8 | 6,409 | 9.5 | 187,025 | 18.7 |
| 1940-1949 | 3,250 | 7.1 | 64,431 | 10.3 | 1,690 | 4.7 | 6,778 | 6.8 | 7,935 | 6.3 | 1,982 | 2.9 | 86,066 | 8.6 |
| 1939 or earlier | 15,181 | 33.0 | 196,524 | 31.6 | 4,442 | 12.2 | 10,984 | 10.9 | 21,060 | 16.8 | 7,609 | 11.2 | 255,800 | 25.6 |
| Total | 46,054 | 100.0 | 622,637 | 100.0 | 36,265 | 100.0 | 100,346 | 100.0 | 125,546 | 100.0 | 67,806 | 100.0 | 998,654 | 100.0 |

Source: U.S. Census

Although fair housing laws prohibit discrimination in rentals as well as purchases of housing, more housing discrimination cases are brought for discrimination in the rental, rather than sales, context. In the six-county region, 66.9% of all housing units were owner-occupied in 2010, leaving 33.1% as rental properties. In 2010, Cuyahoga County had the lowest percentage of owner-occupied housing, at 60.9%, and Geauga County had the highest rate, at 85.7%.

Table 8: Percentage of Owner-Occupied Housing in Region.

| | 1980 | 1990 | 2000 | 2010 |
|-----------|-------------|-------------|-------------|-------------|
| Ashtabula | 75.6 | 80.7 | 74.1 | 71.8 |
| Cuyahoga | 61.2 | 62.0 | 63.2 | 60.9 |
| Geauga | 85.0 | 85.7 | 87.2 | 85.7 |
| Lake | 76.7 | 75.8 | 77.5 | 75.8 |
| Lorain | 73.2 | 71.9 | 74.2 | 72.9 |
| Medina | 79.9 | 79.3 | 81.3 | 80.6 |
| Total | 66.0 | 66.8 | 68.3 | 66.9 |

Source: U.S. Census

III. Fair Housing Laws in Northeast Ohio

Fair housing laws exist to address the effects of housing discrimination in our society. Laws prohibiting discrimination in housing are found at the federal, state, and, in some jurisdictions, local level.⁹ Which law or laws apply in a given situation depend on where the property in question is located and/or where the alleged discriminatory act took place. Ohio law is generally broader than federal law, providing more protection to potential victims of discrimination. Some local laws provide even further protections within their communities than does Ohio law, while in other communities with local legislation, Ohio law remains the broadest in terms of protection. Below is a brief summary of the federal, state, and local fair housing laws in Northeast Ohio.

A. Federal Law

The federal Fair Housing Act (42 U.S.C. §3601, *et seq.*) was passed by Congress in 1968 to help remedy the history of housing discrimination that existed throughout the country. The Fair Housing Act makes it unlawful, on account of one of the classes protected by the statute, to:

- refuse to sell or rent a dwelling;¹⁰
- refuse to negotiate for the sale or rental of a dwelling;
- otherwise make unavailable or deny a dwelling;
- discriminate in the terms, conditions, or privileges of the sale or rental of a dwelling;
- discriminate in the provision of services or facilities in connection with a dwelling;
- make discriminatory advertising or statements with respect to the sale or rental of a dwelling;
- indicate any discriminatory preference or limitation with respect to the sale or rental of a dwelling;
- misrepresent the availability of a dwelling;
- engage in “blockbusting;”¹¹
- discriminate in the financing of residential real estate related transactions;
- discriminate in the provision of brokerage services;
- coerce, intimidate, threaten, or interfere with any person in the exercise of his or her rights under the Act or retaliate against an individual for exercising his or her rights under the Act.

The federal Fair Housing Act prohibits discrimination based on seven grounds: race, color, religion, national origin, sex, familial status, and handicap.¹² “Familial status” is defined under the Fair Housing Act to mean one or more individuals under 18 years of age living with a parent, legal custodian, or the

⁹ In addition to federal, state, and local fair housing laws discussed below in this report, there are a number of other federal statutes that provide protection to individuals from discrimination in housing and mortgage lending. These statutes include: the Civil Rights Act of 1866 (42 U.S.C. §1981 and §1982), the Americans with Disabilities Act (ADA) (42 U.S.C. §1201, *et seq.*), Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. §794), Title VI of the Civil Rights Act of 1964 (42 U.S.C. §2000d, *et seq.*), the Equal Credit Opportunity Act (15 U.S.C. §1691, *et seq.*), and the Housing and Community Development Act (42 U.S.C. §1437, *et seq.*).

¹⁰ In certain circumstances, the owner of a single-family home may be exempt from coverage under the federal Fair Housing Act. In addition, under the “Mrs. Murphy” exemption, an owner-occupied complex of four or fewer units may be exempt from coverage. These exemptions do not exist under Ohio’s fair housing law.

¹¹ “Blockbusting” refers to encouraging homeowners to sell their homes quickly (and often at below market rates) by creating a fear that members of a minority group are moving into the neighborhood.

¹² In passing the Act in 1968, Congress prohibited discrimination based on race, color, religion, and national origin. (Civil Rights Act of 1968, Title VIII, Pub. L. No. 90-284.) Discrimination based on sex (including sexual harassment) was prohibited by a 1974 amendment. (Housing and Community Development Act of 1974, Pub. L. No. 93-383, §808.) In 1988, Congress amended the Act to include familial status and handicap as protected classes. (Fair Housing Amendments Act of 1988, Pub. L. No. 100-430.)

designee of such a parent or legal custodian. In addition, the provision protects individuals in the process of securing legal custody of a minor and pregnant women. 42 U.S.C. §3602(k). A “handicap” is defined under the Fair Housing Act to include a physical or mental impairment which substantially limits one or more major life activity, a record of having such an impairment, or being regarded as having such an impairment. 42 U.S.C. §3602(h).

The Fair Housing Act can be enforced by the U.S. Department of Justice, the U.S. Department of Housing and Urban Development (HUD), and through private lawsuits brought by individuals or organizations that have experienced discrimination.

B. Ohio Law

In addition to being covered by the federal Fair Housing Act, residential property in Ohio is also covered by Ohio’s state law governing fair housing (Ohio Revised Code 4112.02(H)). The Ohio statute is broader than the federal Fair Housing Act in several important respects. First, in addition to prohibiting discrimination based on all of the classes protected by federal law (race, color, religion, national origin, sex, handicap, and familial status), Ohio law also prohibits discrimination based on two additional grounds: “ancestry,” a somewhat different and potentially broader category than “national origin,” and military status. Second, while federal law contains several provisions that exempt certain residential property from coverage, Ohio’s statute does not include these exemptions, making Ohio’s fair housing law applicable to almost all housing in the state.¹³

Although Ohio’s fair housing law is written in language nearly identical to the federal Fair Housing Act, a series of decisions by Ohio courts in 2007 and 2008 interpreted Ohio’s law inconsistently with the federal law in several key respects.¹⁴ These decisions held that the statute of limitations in design and construction cases is only one-year from the issuance of the certificate of occupancy for private citizens, regardless of when they encounter the discrimination;¹⁵ that the Ohio Attorney General may not seek remedies to require retrofitting of inaccessible housing constructed in violation of Ohio’s fair housing law;¹⁶ and that landlords are not required to take action when they know that one tenant is racially harassing another tenant.¹⁷ If allowed to stand, these decisions not only represent limitations on fair housing rights for individuals in the state but also threaten Ohio’s “substantial equivalency” status, including the work-sharing agreement between HUD and the OCRC that results in substantial revenue for the OCRC to investigate and process fair housing cases in the state.¹⁸

¹³ The “Mrs. Murphy” exemption (for an owner-occupied complex of four or fewer units) and the exemption for the sale and rental of an owner’s single-family home are not included in Ohio’s fair housing law. Under both Ohio and federal law, certain noncommercial property owned by religious organizations and private clubs may be exempt from fair housing laws in certain circumstances. In addition, senior housing is exempt from the familial status provisions under both statutes.

¹⁴ See *Ohio Civil Rights Comm’n v. Triangle Real Estate Services, Inc.*, 2007 WL 1125842 (Ohio App. 10 Dist.); *Ohio Civil Rights Comm’n v. Fairmark Development, Inc.*, 2008 WL 5197160 (Ohio App. 10 Dist.); and *Ohio Civil Rights Comm’n v. Akron Metropolitan Housing Authority*, 119 Ohio St. 3d 77 (2008). A fourth decision, *Fair Housing Advocates Ass’n v. Chance*, 2008 Ohio 2603 (Ohio App. 9 Dist.), which had held that private fair housing groups do not have standing to bring cases under Ohio law, was effectively overturned by the Ohio legislature with the passage of HB 1 in 2009, which became effective on October 16, 2009. This bill, among other things, added to Ohio’s fair housing law a definition of an “aggrieved person” that is nearly identical to the federal Fair Housing Act, which has been widely interpreted as encompassing private fair housing organizations. See O.R.C. 4112.01(A)(23).

¹⁵ *Ohio Civil Rights Comm’n v. Triangle Real Estate Services, Inc.*, *supra*.

¹⁶ *Ohio Civil Rights Comm’n v. Fairmark Development, Inc.*, *supra*

¹⁷ *Ohio Civil Rights Comm’n v. Akron Metropolitan Housing Authority*, *supra*.

¹⁸ A series of letters from HUD to the Executive Director of the Ohio Civil Rights Commission in 2008 and 2009

C. Local Law

In addition to the federal and state statutes, both of which apply throughout the State of Ohio, numerous counties, cities, and villages in Northeast Ohio have passed ordinances covering fair housing.

Locally, 38 governments in Cuyahoga County have fair housing ordinances, compared to nine in Lorain County, four in Lake County, three in Ashtabula County, and three in Medina County. There are no local fair housing ordinances in Geauga County.¹⁹ While some of these ordinances provide the same protection as federal or state law, others are broader, offering protection from discrimination to additional classes of individuals.²⁰ The additional classes protected by cities in the region (and the number of local jurisdictions protecting them) include age (24 ordinances), marital status (21), creed (18), sexual orientation (13), disabled veteran status and Vietnam veteran status (5), ethnic group (5), gender identity (7), military status (8), military discharge status (1), occupation (1), parental status (1), source of income (3), and association with a protected class (1).

Table 9 provides a comparison of the local fair housing laws passed by villages, cities, and counties in the six-county region covered by this report, including the classes protected from discrimination by each ordinance. In addition, the table indicates which jurisdictions have a complaint procedure and/or a local fair housing board to investigate complaints.

warned the Commission that it risked losing its substantial equivalency status if the State of Ohio did not address these changes in Ohio law that limit the fair housing rights of residents. See Kenneth J. Carroll, letter to G. Michael Payton, April 23, 2009, available at http://www.restorefairhousing.org/2009-04-23_HUDletter.PDF; Lynn M. Grosso, letter to G. Michael Payton, February 18, 2009, available at http://www.restorefairhousing.org/2009-02-18_HUDletter.PDF; Kenneth J. Carroll, letter to G. Michael Payton, August 12, 2008, available at http://www.restorefairhousing.org/2008-08-12_HUDletter.PDF. The OCRC responded by supporting legislation that would address some, although not all, of these changes. See OCRC, Briefing, April 29, 2009, available at <http://crc.ohio.gov/pdf/HousingAmendments.pdf>. Of the changes supported by the OCRC in its April 29, 2009, Briefing, all were adopted by the Ohio General Assembly except for the proposed change to address the *Fairmark* decision limiting the remedies available to the Ohio Attorney General in certain accessibility cases.

¹⁹ For purposes of this report, we consider local fair housing ordinances to be laws that prohibit discrimination in housing transactions. Two counties (Lorain and Medina) passed resolutions making housing discrimination illegal. We have included these as fair housing ordinances. In addition to the ordinances listed here, a number of jurisdictions have ordinances criminalizing intimidation in housing. The jurisdictions with intimidation ordinances only include: Avon, Avon Lake, Jefferson Village, Lyndhurst, Middleburg Heights, Pepper Pike, Solon, and Wadsworth. Because these ordinances are criminal intimidation statutes, we do not include them in Table 9 or this analysis of local fair housing laws.

²⁰ Some of these statutes are narrower than federal or state law. In those cases, the broader protections offered by state and/or federal law would apply.

| Complaint Process | N | Y | N | N | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | N |
|------------------------------------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|---------|--------|--------|---------|--------|---|---|---|
| Fair Housing Board | N | N | N | N | Y | N | N | Y | N | Y | Y | Y | Y | Y | Y | Y | Y | Y | N |
| Citation | 763.01 | 563.01 | 773.01 | 519.01 | 715.01 | 516.01 | 515.99 | 825.04 | 150.02 | 743.01 | 515.01 | 1901.07 | 628.01 | 628.01 | 1353.04 | 623.01 | | | |
| Association with a Protected Class | | | | | | | | | | | | | | | | | | | |
| Occupation | | | | | | | | | | | | | | | | | | | |
| Source of Income | | | | | | | | | | | | | | | | | | | |
| Vietnam/Disabled Vet Status | | | | | | | | | | | X | | | | | | | | |
| Military Discharge Status | | | | | | | | | | | | | | | | | | | |
| Ethnic Group | | | | | | | | | | | X | | | | | | | | |
| Sexual Orientation | | | | | | X | | | | | X | X | | | | | | | |
| Gender Identity | | | | | | X | | | | | | | | | | | | | |
| Parental Status | | | | | | | | | | | | | | | | | | | |
| Marital Status | | | | | | | X | | X | | | | | | | | | | |
| Creed | | | | | | | X | | X | | | | | | | | | | |
| Age | | X | | | | | X | X | X | | X | X | | | | | | | |
| Military Status | | | | | | | | | X | | | | | | | | | | |
| Ancestry | X | | X | X | X | X | | X | X | X | X | X | X | X | X | X | X | X | X |
| Handicap/Disability | X | X | X | X | X | X | X | X | X | X | X | X | X | X | X | X | X | X | X |
| Familial Status | X | X | X | X | X | X | X | X | X | X | X | X | X | X | X | X | X | X | X |
| Sex/Gender | X | X | X | X | X | X | X | X | X | X | X | X | X | X | X | X | X | X | X |
| National Origin | X | X | X | X | X | X | X | X | X | X | X | X | X | X | X | X | X | X | X |
| Religion | X | X | X | X | X | X | X | X | X | X | X | X | X | X | X | X | X | X | X |
| Color | X | X | X | X | X | X | X | X | X | X | X | X | X | X | X | X | X | X | X |
| Race | X | X | X | X | X | X | X | X | X | X | X | X | X | X | X | X | X | X | X |
| Cuyahoga County (Cont.) | | | | | | | | | | | | | | | | | | | |
| Euclid | | | | | | | | | | | | | | | | | | | |
| Fairview Park | | | | | | | | | | | | | | | | | | | |
| Gates Mills | | | | | | | | | | | | | | | | | | | |
| Glenwillow | | | | | | | | | | | | | | | | | | | |
| Highland Hills | | | | | | | | | | | | | | | | | | | |
| Lakewood | | | | | | | | | | | | | | | | | | | |
| Linndale | | | | | | | | | | | | | | | | | | | |
| Maple Heights | | | | | | | | | | | | | | | | | | | |
| Mayfield Heights | | | | | | | | | | | | | | | | | | | |
| Mayfield Village | | | | | | | | | | | | | | | | | | | |
| Newburgh Heights | | | | | | | | | | | | | | | | | | | |
| North Olmsted | | | | | | | | | | | | | | | | | | | |
| North Randall | | | | | | | | | | | | | | | | | | | |
| North Royalton | | | | | | | | | | | | | | | | | | | |
| Oakwood | | | | | | | | | | | | | | | | | | | |
| Olmsted Falls | | | | | | | | | | | | | | | | | | | |

IV. Fair Housing Complaints in Northeast Ohio

A. Federal and State Complaint Process

Under the federal Fair Housing Act, individuals who have suffered discrimination may choose to file an administrative complaint before the U.S. Department of Housing and Urban Development (HUD), a lawsuit in court, or both. Because Ohio's fair housing law has been designated substantially similar to the federal statute, virtually all housing discrimination complaints filed with HUD are referred to the Ohio Civil Rights Commission (OCRC) for investigation and potential resolution.²¹

Ohio's fair housing law also allows individuals to pursue remedies administratively before the OCRC or in court. In addition to investigating cases referred by HUD, the OCRC accepts complaints of housing discrimination filed with the agency directly.²²

Once the OCRC receives a complaint (or "charge"), the agency assigns it to an investigator. The investigator researches the complaint, speaking with the parties and witnesses and reviewing any available documentation to determine if there is probable cause of discrimination. Prior to making the decision, the OCRC offers the parties the opportunity to voluntarily mediate their dispute. If both parties agree, a mediator meets with the parties and attempts to find a mutually satisfactory resolution. If a settlement is not reached, the case continues to be investigated.²³

After the investigator has reached a recommendation, the case is submitted for supervisory approval and ultimately to the Commissioners, who must approve the report before it becomes a final OCRC finding. Based on its review of the report and recommendation of the OCRC's field staff, the Commission makes a finding of "probable cause" or "no probable cause" of discrimination.

If the OCRC finds probable cause of discrimination, the parties are offered a final chance to resolve their differences through a conciliation process. In the event that the dispute cannot be resolved, the case is referred to the Civil Rights Section of the Ohio Attorney General's Office to bring a civil action before an administrative hearing officer or, if the parties request, in state court.

B. Number of Complaints Filed in Region

The Housing Center has collected and analyzed data on all fair housing complaints filed in the six-county region with HUD from 1991 through 2012.²⁴ The data reveal that over the 22-year period:

- on average, 129 complaints were filed each year in the region;

²¹ According to the agreement between HUD and the OCRC, with several small exceptions, fair housing complaints from Ohio that are filed with HUD are referred to the OCRC for investigation and resolution. In 2005, less than one percent of cases were investigated by HUD. (Email communication with Carolyn Murphy, Director of Columbus Fair Housing Center, U.S. Department of Housing and Urban Development, March 10, 2006.) In addition, starting in 2009, HUD also began retaining jurisdiction of cases alleging violations of the accessibility provisions for new multi-family construction.

²² The procedures of the OCRC are set forth in ORC 4112.03-4112.06 and in the Ohio Administrative Code 4112-3-01 through 4112-3-17.

²³ The Commission has the authority to demand access to records, premises, documents, evidence or possible sources of evidence, and to record testimony or statements from individuals. Further, the agency has the right to issue subpoenas, interrogatories, and cease and desist orders; hold public hearings; and collect monetary benefits.

²⁴ For purposes of this report, we considered each basis raised as a complaint. For details of the Housing Center's methodology, see Appendix C.

- cases filed alleging race discrimination accounted for 35.76% of the total, compared to 24.56% for handicap/disability, and 20.58% for familial status;
- complaints based on national origin accounted for 7.05% of the total, sex/gender cases made up 5.46%, religion cases made up 1.83%, and color accounted for 0.95%;
- almost three-quarters of the complaints (74.45%) were filed in Cuyahoga County.²⁵

The Housing Center also examined how complaints have changed over time in the region, to determine whether certain types of discrimination were being alleged more (or less) during this period.²⁶ The total number of complaints filed has increased from 87 in 2000 to 108 in 2012.

Because of the possibility that any particular year could have an unusually large or small number of complaints filed in a given category, we also examined the number of complaints filed in two five-year periods (2003-2007 and 2008-2012) to ascertain whether the types of complaints being filed recently differed from those being filed earlier. This analysis revealed the following:

- in the last five years (2008-2012), there were 927 complaints filed with HUD, for an average of 185.4 complaints annually, up from 699 complaints (139.8 annually) filed in the previous five year period (2003-2007);
- the most common bases of discrimination alleged in complaints filed in 2008-2012 were familial status (28.91%), disability (25.03%), and race (23.84%);
- the number of cases brought by race decreased by 8.77% (from 242 in the period 2003-2007 to 221 in 2008-2012); but proportionately, complaints based on race made up 23.84% of the total from 2008-2012, down from 34.62% in the period 2003-2007;
- in the last five years, the number of complaints based on disability increased by 1.31%, from 229 to 232; yet complaints based on disability made up 25.03% of the complaints in 2008-2012, less than 32.76% in the previous five-year period;
- the number of complaints based on familial status increased from 89 in the period 2003-2007 to 268 in the last five years; familial status complaints made up 28.91% of the total in the 2008-2012 period, up from 12.73% in the preceding five-year period;
- from 2003-2007 to 2008-2012, complaints based on national origin have increased from 6.15% of the total to 8.85% (from 43 complaints to 82), cases brought by sex/gender have increased from 4.01% of the total to 7.23% (from 28 to 67), and complaints based on religion have increased from 1.86% of the total to 2.27% (from 13 to 21).

²⁵ See Appendix A.

²⁶ While an increase in cases filed could result from an increase in discrimination, it also could be due to increased monitoring of discrimination, increased knowledge of the law, or other factors. Likewise, a decrease in the number of cases filed does not necessarily represent a decrease in discrimination on that basis. For instance, in November 2008, the Housing Center filed 53 complaints with HUD based on discriminatory internet advertisements on craigslist.org and other internet sites. The majority of these complaints involved familial status discrimination. Some of these complaints were entered into HUD's database as 2008 complaints, while others were entered as 2009 complaints.

Table 10: Number and Basis of Fair Housing Complaints filed with HUD in the Region²⁷

| | Race | Color | Religion | National Origin | Sex/Gender | Familial Status | Handicap/Disability | Retaliation | Total |
|--------------|-------------|-----------|-----------|-----------------|------------|-----------------|---------------------|-------------|-------------|
| 1991 | 68 | 1 | 0 | 8 | 8 | 32 | 17 | 0 | 134 |
| 1992 | 68 | 1 | 2 | 12 | 7 | 25 | 13 | 0 | 128 |
| 1993 | 88 | 0 | 2 | 11 | 11 | 30 | 31 | 1 | 174 |
| 1994 | 62 | 1 | 0 | 6 | 7 | 31 | 25 | 1 | 133 |
| 1995 | 47 | 1 | 2 | 2 | 7 | 22 | 18 | 1 | 100 |
| 1996 | 53 | 1 | 1 | 7 | 6 | 19 | 12 | 0 | 99 |
| 1997 | 28 | 0 | 1 | 12 | 1 | 7 | 19 | 2 | 70 |
| 1998 | 32 | 0 | 1 | 0 | 2 | 9 | 14 | 4 | 62 |
| 1999 | 35 | 1 | 4 | 2 | 6 | 14 | 22 | 6 | 90 |
| 2000 | 29 | 6 | 0 | 10 | 1 | 10 | 26 | 5 | 87 |
| 2001 | 17 | 1 | 2 | 4 | 1 | 14 | 19 | 4 | 62 |
| 2002 | 25 | 1 | 3 | 1 | 3 | 14 | 20 | 6 | 73 |
| 2003 | 57 | 0 | 3 | 13 | 6 | 20 | 43 | 10 | 152 |
| 2004 | 46 | 2 | 1 | 3 | 3 | 10 | 46 | 5 | 116 |
| 2005 | 44 | 3 | 5 | 8 | 3 | 13 | 52 | 21 | 149 |
| 2006 | 54 | 2 | 2 | 9 | 7 | 25 | 63 | 6 | 168 |
| 2007 | 41 | 2 | 2 | 10 | 9 | 21 | 25 | 4 | 114 |
| 2008 | 84 | 1 | 12 | 35 | 8 | 26 | 80 | 6 | 252 |
| 2009 | 56 | 1 | 0 | 16 | 20 | 89 | 36 | 7 | 225 |
| 2010 | 44 | 0 | 2 | 22 | 23 | 49 | 46 | 12 | 198 |
| 2011 | 20 | 0 | 2 | 4 | 8 | 68 | 40 | 2 | 144 |
| 2012 | 17 | 2 | 5 | 5 | 8 | 36 | 30 | 5 | 108 |
| Total | 1015 | 27 | 52 | 200 | 155 | 584 | 697 | 108 | 2838 |

Source: HRAC analysis of HUD data

The Housing Center also undertook an analysis of the number of complaints filed per 100,000 residents each year in the region.²⁸ This analysis revealed that during this 22-year period, an average of 5.89 complaints were filed per year for each 100,000 people in the six-county region. Cuyahoga County had the highest incidence of housing complaints based on population size in the region (7.13 per 100,000), while Geauga County had the lowest incidence (2.76 per 100,000).

The different rates of cases filed in different counties is likely due to a number of factors in addition to differential rates of discrimination, including the racial and ethnic make-up of the region, the percentage of rental (as compared to owner-occupied) housing, housing mobility rates, and the presence or absence of fair housing organizations in the counties who might educate and assist potential victims of discrimination and conduct systemic testing.

²⁷ County-level data are presented in Appendix A.

²⁸ County-level data are presented in Appendix A.

0 people, the Housing Center divided the average number of complaints per year for each jurisdiction by the mean of the total population in 1990 and 2010 and then multiplied this amount by 100,000.

V. Racial and Ethnic Segregation in Northeast Ohio

One of the most common measures of the segregation of a region is the dissimilarity index. This index measures the percentage of a minority population who would have to move from one neighborhood to another neighborhood in order to achieve complete integration. Using the dissimilarity index, a score of 0 would represent a completely integrated distribution of individuals, while a score of 100 would be a situation in which both groups (e.g. races) were completely segregated and in which every member of the minority group (e.g. African Americans) would have to move in order to achieve complete integration.

Using the dissimilarity index for African Americans and whites, the Cleveland region has had little change in the past twenty years, moving from the fifth most-segregated area in the country in 1990, to the sixth in 2000, and back to the fifth most-segregated area in 2010. During this period, the MSA's ranking on the dissimilarity index has improved slightly from a score of 82.8 in 1990 to 78.2 in 2000 to 74.1 in 2010.

Table 11: Residential Segregation for African Americans in Large Metropolitan Areas Ranked by Dissimilarity Index

| | 1990 | 2000 | 2010 |
|------|--------------------------------|--------------------------------|--------------------------------|
| Rank | MSA/PMSA Name | MSA/PMSA Name | MSA/PMSA Name |
| 1 | Detroit | Detroit | Milwaukee-Waukesha |
| 2 | Chicago | Milwaukee-Waukesha | New York |
| 3 | Milwaukee-Waukesha | New York | Chicago |
| 4 | Newark | Newark | Detroit |
| 5 | Cleveland-Lorain-Elyria | Chicago | Cleveland-Lorain-Elyria |
| 6 | New York | Cleveland-Lorain-Elyria | Buffalo-Niagara Falls |
| 7 | Buffalo-Niagara Falls | Buffalo-Niagara Falls | St. Louis |
| 8 | St. Louis | Cincinnati | Cincinnati |
| 9 | Bergen-Passaic | St. Louis | Philadelphia |
| 10 | Philadelphia | Nassau-Suffolk | Los Angeles |

Source: Population Studies Center/University of Michigan

While these measures show a slight improvement for the region, the continued out-migration of population from the region, and from Cuyahoga County in particular, presents challenges for racial integration in the region. As many researchers have noted, the areas of the country that have shown the most gains in terms of residential integration have been those in the south and west that have experienced the largest population growth.²⁹ In fact, of the 10 most segregated large metropolitan areas in 2010, all but one (Los Angeles) are in the Northeast or Midwest.

Segregated housing patterns affect the ability of African American families to build wealth through home ownership. A 2001 report sponsored by the Brookings Institute concluded that a “segregation tax” is imposed on African American homeowners due to the decreased value of property in predominantly minority neighborhoods.³⁰ According to this report, the Cleveland area suffers from a “tax” of 24%, meaning that for each dollar of income, African American homeowners have 24% less in home values compared to whites with the same income. While this “tax” is not formally assessed or collected by any governmental body, the lower amount of wealth that African Americans are able to accumulate has a real effect on their wealth and the amount of money they can pass on to their children.

²⁹ See, e.g., Robert L. Smith and David Davis, “Migration Patterns Hold Back Cleveland,” *Plain Dealer*, December 30, 2002.

³⁰ Rusk, David, “The ‘Segregation Tax.’ The Cost of Racial Segregation to Black Homeowners,” Washington, D.C.: Brookings Institution, October 2001.

With regard to segregation for Hispanics/Latinos, the situation has slowly improved in the past decade. Overall, Hispanics/Latinos in the region are less segregated than African Americans. The Cleveland metropolitan area has gone from being the ninth most segregated in 1990, the eleventh most segregated in 2000, and the twentieth most segregated in 2010. The segregation index peaked in 2000 at 58.5, a slight increase from 58.3 in 1990. In 2010, the segregation index decreased to 52.3, a -6.3 change in segregation.

Table 12: Residential Segregation for Hispanics/Latinos in Large Metropolitan Areas Ranked by Dissimilarity Index

| | 1990 | 2000 | 2010 |
|-------------|--------------------------------|--------------------------------|---|
| Rank | MSA/PMSA Name | MSA/PMSA Name | MSA/PMSA Name |
| 1 | Newark | Providence-Fall River-Warwick | Springfield, MA |
| 2 | Hartford | New York | Los Angeles-Long Beach |
| 3 | New York | Newark | New York |
| 4 | Philadelphia | Hartford | Providence-New Bedford-Fall River |
| 5 | Chicago | Los Angeles-Long Beach | Boston |
| 6 | Providence-Fall River-Warwick | Chicago | Bridgeport-Stamford-Norwalk, CT |
| 7 | Los Angeles-Long Beach | Philadelphia | Hartford-West, Hartford-East Hartford, CT |
| 8 | Bergen-Passaic | Milwaukee-Waukesha | Miami |
| 9 | Cleveland-Lorain-Elyria | Boston | Milwaukee-Waukesha |
| 10 | Milwaukee-Waukesha | Bergen-Passaic | Chicago |
| 11 | Boston | Cleveland-Lorain-Elyria | Allentown-Bethlehem-Easton, PA-NJ |
| 12 | San Antonio | Houston | Philadelphia |
| 13 | Miami | Orange County | Oxnard-Thousand Oaks-Ventura, CA |
| 14 | Orange County | Dallas | New Haven-Milford, CT |
| 15 | Dallas | San Francisco | Lancaster, PA |

Source: Population Studies Center/University of Michigan

VI. Recommendations

Racial and other forms of housing discrimination and segregation continue to be prevalent in Northeast Ohio and most of the country despite the passage of the Fair Housing Act 45 years ago. Although residents have benefitted from the protections of the federal, state and local fair housing laws, racial and other forms of housing discrimination continue and communities in Northeast Ohio remain significantly segregated. The ongoing impact of segregation, illustrated by dissimilarity indices and “segregation taxes,” continues to contribute to disparities in the accumulation of wealth and lost social opportunities by racial and ethnic minorities.

As noted at the outset of this report, housing discrimination affects not only whether or not an individual will be able to rent a given apartment or purchase a particular house. It also significantly affects people’s lives in many other areas, including what type of city and neighborhood they can live in, the schools their children attend, their access to transportation, jobs, public services, and the amount of wealth they are able to build due to home equity.

This report outlines several areas in which our region has significant work to do to affirmatively further fair housing. There are concrete steps that government officials and others can take that will have a positive impact on the state of fair housing in the region. To help accomplish this goal, the Housing Research & Advocacy Center recommends the following:

- 1) **Strengthen fair housing laws.** Fair housing laws should protect a broader class of individuals than are currently protected by federal and state law.
 - The Housing Center believes that local governments should follow the lead of some of the cities identified in this report and prohibit discrimination based on their sexual orientation, gender identity, marital status, and age.
 - In addition, the Housing Center urges local governments to protect consumers based on source of income, to ensure that individuals who use housing subsidies (including “Section 8 vouchers”) are not discriminated against on that basis. Adding protection based on source of income is one step that local and regional governments can take to help ensure that economic segregation does not replace the racial discrimination that we currently suffer.
 - State and local visitability ordinances should be adopted to expand the protection of fair housing laws for people with disabilities to enable them to visit other residents living in single family homes.

As was noted above, a series of decisions made in the past several years by state Courts of Appeals have narrowed the rights and remedies provided under Ohio’s fair housing law. These decisions threaten Ohio’s “substantially equivalency” status, through which the state receives over \$1 million per year from HUD to investigate and process fair housing cases in Ohio, and limit the rights of Ohio citizens to bring fair housing cases and of the courts to issue appropriate remedies under state law. We urge concerned citizens and organizations to support the passage of legislation that would restore Ohio’s fair housing law and overturn these decisions.

- 2) **Thoughtfully research and utilize regional analysis of impediments to fair housing choice report.** HUD has been moving toward funding regions to research barriers to fair housing choice on a regional level rather than municipal or county level as has been typically done in the past. In 2012, the Northeast Ohio Sustainability Communities Consortium Initiative (NEOSCC) was mandated by HUD to conduct an AI in the 12-county region of Northeast Ohio (Ashtabula, Cuyahoga, Geauga, Lake, Lorain, Mahoning, Medina, Portage, Summit, Stark, Trumbull, and Wayne).

Because of the region varies so much from place to place (Northeast Ohio encompasses everything from major metropolitan city to rural farmland), the AI must be written and utilized with care. The NEOSCC, policy makers, and housing agencies must strategize concrete ways the AI can best be put into practice and how municipalities can remain accountable for furthering fair housing.

- 2) **Enforce fair housing laws more vigorously to “affirmatively further fair housing.”** While having strong laws is important, without vigorous enforcement, housing discrimination will continue.

Housing discrimination is not always easy to detect. Discrimination now often occurs in more subtle forms than before, such as refusing to return telephone calls from individuals with African American dialects or speech patterns, falsely stating the an available dwelling is no longer available, or changing the terms or conditions of a home purchase or rental based on a protected

characteristic. African American men who have been incarcerated are disparately impacted by denial of housing based on their criminal history after serving their debt to society. This discrimination prevents their productive reentry into the community.

Immigrants and individuals with limited English proficiency experience similar discrimination based upon “citizenship” questions and often fear the repercussions of reporting discrimination.

It is the responsibility of federal, state, and local governments to work to ensure that all citizens have a fair opportunity to rent and purchase housing in cities and neighborhoods they desire. Moreover, it is a legal obligation of governments that receive Community Development Block Grant (CDBG) and other HUD funds to take actions that “affirmatively further fair housing.”³¹ The Housing Center believes that local and county governments throughout the region can do more to meet their obligations under the law.

A vigorous enforcement strategy should include an adequate testing program to ensure that discrimination is both deterred and detected. In cases where housing discrimination is found, governments must take strong action to ensure that those found guilty are punished, both as a means of compensating victims, as well as deterring future violations.

In addition, even though the Fair Housing Act’s accessibility provisions for multi-family housing have been in place for over 19 years, new housing is still being built in violation of these provisions. Governments at all levels must ensure that these requirements are complied with to ensure that the region’s housing stock becomes more accessible.

- 3) **Support and adequately fund the new federal Consumer Financial Protection Bureau to protect individuals from abusive and unfair products and services.** The CFPB was designed to promote financial education for consumers; supervise banks, credit unions, and financial companies; enforce federal consumer protection laws; and research consumer behavior. The Housing Center strongly supports efforts to ensure that the CFPB has sufficient resources to adequately investigate and enforce anti-discrimination and consumer protection laws to ensure that discrimination is not occurring in the mortgage and financial services industries.³²

³¹ In February 2009, U.S. District Court Judge Denise Cote held that Westchester County, New York, had submitted “false or fraudulent” claims to the government and “utterly failed” to meet its obligation to affirmatively further fair housing over a period of years. *United States of America ex rel. Anti-Discrimination Center of Metro New York, Inc., v. Westchester County, New York*, (S.D.N.Y. February 24, 2009).

³² The Housing Center conducts an annual analysis of race and ethnicity in Ohio mortgage lending. The most recent *Housing Research & Advocacy Center* Page 29

- 4) **Devote increased resources to educating housing providers and professionals, as well as the public at large, regarding fair housing laws.** While most individuals likely know that discrimination based on race or religion in housing is illegal, some housing providers are still unaware that discrimination based on familial status and handicap/disability are prohibited. The Housing Center continues to uncover new multi-family housing that does not comply with federal and state accessibility requirements.³³ Additionally, many victims of housing discrimination are unaware of their rights under federal, state, and especially local laws, and of the procedures they

may use to vindicate those rights. As such, increased resources must be devoted to education on fair housing laws and procedures, as well as where individuals may turn for help if they have questions or believe their rights have been violated.

- 5) **Provide government incentives to help achieve housing integration.** Forty-four years after the passage of the Fair Housing Act, we continue to live in a region that is highly segregated, particularly for African Americans. At the current rate of “progress,” it will take decades for the region to become integrated. Governments should develop creative mechanisms to help address housing discrimination, possibly including the use of financial incentives for individuals making diversifying moves. For example, tax incentives, such as a state tax credit, could be offered to individuals who make a racially diversifying move.

In addition, local land use codes and regulations must be examined and revised to ensure both that individuals and groups are not discriminated against and that such policies do not exacerbate regional sprawl, further weakening our region and worsening economic, racial, and ethnic segregation.

As the housing market reaches a “new normal” it is time to evaluate current practices and develop effective solutions to eliminate segregation and promote diverse communities. While these recommendations are broad and will require investment of time and resources, the Housing Center believes that they will strengthen our region and benefit the entire community, making our region not only more just and equitable but economically stronger.

report, examining 2010 mortgage lending data, found continued racial and ethnic disparities throughout Ohio. See Housing Research & Advocacy Center, “Racial and Ethnic Disparities in 2010 Mortgage Lending,” available at <http://www.thehousingcenter.org/Publications/Research-Reports.html>.

³³ See HRAC, “Housing Group, Ohio Civil Rights Commission Settles Federal Housing Discrimination Suit with Cleveland Developers, Architects: Defendants Agree to Make Units in Stonebridge Complex Accessible to Persons with Disabilities,” June 13, 2011. Available at <http://www.thehousingcenter.org/Publications/PressReleases.html>

Appendix A

Population Data by County

Table 13: Race of Population: Ashtabula County

| | 1970 | | 1980 | | 1990 | | 2000 | | 2010 | |
|-----------------------------------|--------|------|---------|------|--------|------|--------|------|--------|------|
| | Number | % | Number | % | Number | % | Number | % | Number | % |
| White | 95,372 | 97.0 | 100,129 | 96.1 | 95,465 | 95.6 | 96,635 | 94.1 | 94,041 | 92.7 |
| African American or Black | 2,652 | 2.7 | 3,060 | 2.9 | 3,138 | 3.1 | 3,247 | 3.2 | 3,586 | 3.5 |
| American Indian and Alaska Native | NR | NR | 160 | 0.2 | 196 | 0.2 | 195 | 0.2 | 241 | 0.2 |
| Asian and Pacific Islander | NR | NR | 317 | 0.3 | 350 | 0.4 | 371 | 0.4 | 397 | 3.9 |
| Two or more races | NR | NR | NR | NR | NR | NR | 1,402 | 1.4 | 2,146 | 2.1 |

Source: U.S. Census

Table 14: Race of Population: Cuyahoga County

| | 1970 | | 1980 | | 1990 | | 2000 | | 2010 | |
|-----------------------------------|-----------|------|-----------|------|-----------|------|---------|------|---------|------|
| | Number | % | Number | % | Number | % | Number | % | Number | % |
| White | 1,383,749 | 80.4 | 1,129,966 | 75.4 | 1,025,756 | 72.6 | 938,863 | 67.4 | 814,103 | 63.6 |
| African American or Black | 328,419 | 19.1 | 341,003 | 22.8 | 350,185 | 24.8 | 382,634 | 27.4 | 380,198 | 29.7 |
| American Indian and Alaska Native | NR | NR | 1,644 | 0.1 | 2,533 | 0.2 | 2,529 | 0.2 | 2,578 | 0.2 |
| Asian and Pacific Islander | NR | NR | 11,470 | 0.8 | 18,085 | 1.3 | 25,583 | 1.8 | 33,168 | 2.6 |
| Two or more race | NR | NR | NR | NR | NR | NR | 23,407 | 1.7 | 26,736 | 2.1 |

Source: U.S. Census

Table 15: Race of Population: Geauga County

| | 1970 | | 1980 | | 1990 | | 2000 | | 2010 | |
|-----------------------------------|--------|------|--------|------|--------|------|--------|------|--------|------|
| | Number | % | Number | % | Number | % | Number | % | Number | % |
| White | 61,951 | 98.4 | 73,133 | 98.2 | 79,629 | 98.2 | 88,553 | 97.4 | 90,514 | 96.9 |
| African American or Black | 873 | 1.4 | 990 | 1.3 | 1,056 | 1.3 | 1,110 | 1.2 | 1,198 | 1.3 |
| American Indian and Alaska Native | NR | NR | 34 | 0.0 | 83 | 0.1 | 69 | 0.1 | 75 | 0.1 |
| Asian and Pacific Islander | NR | NR | 239 | 0.3 | 312 | 0.4 | 395 | 0.4 | 568 | 0.6 |
| Two or more races | NR | NR | NR | NR | NR | NR | 645 | 0.7 | 788 | 0.8 |

Source: U.S. Census

Table 16: Race of Population: Lake County

| | 1970 | | 1980 | | 1990 | | 2000 | | 2010 | |
|-----------------------------------|---------|------|---------|------|---------|------|---------|------|---------|------|
| | Number | % | Number | % | Number | % | Number | % | Number | % |
| White | 193,993 | 98.4 | 207,995 | 97.7 | 209,879 | 97.4 | 217,041 | 95.4 | 212,713 | 92.5 |
| African American or Black | 2,634 | 1.3 | 2,944 | 1.4 | 3,528 | 1.6 | 4,527 | 2.0 | 7,306 | 31.8 |
| American Indian and Alaska Native | NR | NR | 202 | 0.1 | 250 | 0.1 | 251 | 0.1 | 273 | 0.1 |
| Asian and Pacific Islander | NR | NR | 1,152 | 0.5 | 1,447 | 0.7 | 2,089 | 0.9 | 2,646 | 1.2 |
| Two or more races | NR | NR | NR | NR | NR | NR | 2,098 | 0.9 | 3,526 | 1.5 |

Source: U.S. Census

Table 17: Race of Population: Lorain County

| | 1970 | | 1980 | | 1990 | | 2000 | | 2010 | |
|-----------------------------------|---------|------|---------|------|---------|------|---------|------|---------|------|
| | Number | % | Number | % | Number | % | Number | % | Number | % |
| White | 239,252 | 93.2 | 246,516 | 89.7 | 241,549 | 89.1 | 243,514 | 85.5 | 255,410 | 84.8 |
| African American or Black | 17,491 | 6.8 | 19,813 | 7.2 | 21,230 | 7.8 | 24,203 | 8.5 | 25,799 | 8.6 |
| American Indian and Alaska Native | NR | NR | 451 | 0.2 | 738 | 0.3 | 845 | 0.3 | 883 | 0.3 |
| Asian and Pacific Islander | NR | NR | 972 | 0.4 | 1,479 | 0.5 | 1,777 | 0.6 | 2,860 | 0.9 |
| Two or more races | NR | NR | NR | NR | NR | NR | 6,165 | 2.2 | 8,994 | 3.0 |

Source: U.S. Census

Table 18: Race of Population: Medina County

| | 1970 | | 1980 | | 1990 | | 2000 | | 2010 | |
|-----------------------------------|--------|------|---------|------|---------|------|---------|------|---------|------|
| | Number | % | Number | % | Number | % | Number | % | Number | % |
| White | 81,919 | 99.0 | 111,815 | 98.8 | 120,504 | 98.5 | 146,956 | 97.3 | 165,642 | 96.1 |
| African American or Black | 688 | 0.8 | 709 | 0.6 | 850 | 0.7 | 1,323 | 0.9 | 2,027 | 1.2 |
| American Indian and Alaska Native | NR | NR | 134 | 0.1 | 172 | 0.1 | 232 | 0.2 | 247 | 0.1 |
| Asian and Pacific Islander | NR | NR | 310 | 0.3 | 684 | 0.6 | 994 | 0.7 | 1,678 | 1.0 |
| Two or more races | NR | NR | NR | NR | NR | NR | 1,215 | 0.8 | 2,086 | 1.2 |

Source: U.S. Census

Appendix B
Fair Housing Complaint Data by County

Table 19: Number and Basis of Complaints filed with HUD: Ashtabula County

| | Race | Color | Religion | National Origin | Gender | Familial Status | Disability | Retaliation | Total |
|-------|------|-------|----------|-----------------|--------|-----------------|------------|-------------|-------|
| 1991 | 3 | 0 | 0 | 2 | 0 | 0 | 0 | 0 | 5 |
| 1992 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 1993 | 1 | 0 | 0 | 0 | 0 | 1 | 0 | 0 | 2 |
| 1994 | 2 | 0 | 0 | 0 | 0 | 0 | 4 | 0 | 6 |
| 1995 | 2 | 0 | 0 | 0 | 0 | 1 | 0 | 0 | 3 |
| 1996 | 2 | 0 | 0 | 0 | 0 | 1 | 0 | 0 | 3 |
| 1997 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 1998 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 1999 | 0 | 0 | 0 | 0 | 0 | 1 | 1 | 0 | 2 |
| 2000 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1 |
| 2001 | 0 | 0 | 0 | 0 | 0 | 0 | 1 | 0 | 1 |
| 2002 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 2003 | 0 | 0 | 0 | 0 | 0 | 0 | 2 | 1 | 3 |
| 2004 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1 |
| 2005 | 1 | 0 | 0 | 0 | 0 | 0 | 2 | 1 | 4 |
| 2006 | 3 | 0 | 0 | 0 | 0 | 0 | 1 | 0 | 4 |
| 2007 | 1 | 0 | 0 | 0 | 0 | 2 | 4 | 0 | 7 |
| 2008 | 1 | 0 | 0 | 0 | 0 | 2 | 11 | 0 | 14 |
| 2009 | 2 | 0 | 0 | 1 | 1 | 0 | 3 | 0 | 7 |
| 2010 | 0 | 0 | 0 | 0 | 0 | 2 | 4 | 0 | 6 |
| 2011 | 2 | 0 | 0 | 0 | 0 | 0 | 5 | 0 | 7 |
| 2012 | 0 | 0 | 0 | 0 | 0 | 0 | 2 | 0 | 2 |
| Total | 22 | 0 | 0 | 3 | 1 | 10 | 40 | 2 | 78 |

Source: HRAC analysis of HUD data

Table 20: Number and Basis of Complaints filed with HUD: Cuyahoga County

| | Race | Color | Religion | National Origin | Gender | Familial Status | Disability | Retaliation | Total |
|-------|------|-------|----------|-----------------|--------|-----------------|------------|-------------|-------|
| 1991 | 49 | 1 | 0 | 5 | 7 | 21 | 13 | 0 | 96 |
| 1992 | 61 | 1 | 2 | 10 | 4 | 16 | 12 | 0 | 106 |
| 1993 | 78 | 0 | 2 | 6 | 10 | 22 | 27 | 0 | 145 |
| 1994 | 49 | 1 | 0 | 5 | 6 | 23 | 19 | 0 | 103 |
| 1995 | 43 | 0 | 2 | 1 | 4 | 16 | 15 | 1 | 82 |
| 1996 | 44 | 1 | 1 | 7 | 5 | 12 | 10 | 0 | 80 |
| 1997 | 28 | 0 | 1 | 12 | 0 | 5 | 14 | 2 | 62 |
| 1998 | 27 | 0 | 0 | 0 | 0 | 5 | 14 | 3 | 49 |
| 1999 | 31 | 1 | 4 | 2 | 4 | 8 | 19 | 6 | 75 |
| 2000 | 25 | 6 | 0 | 10 | 1 | 6 | 20 | 5 | 73 |
| 2001 | 17 | 0 | 2 | 3 | 0 | 8 | 14 | 3 | 47 |
| 2002 | 21 | 1 | 1 | 0 | 2 | 8 | 13 | 4 | 50 |
| 2003 | 46 | 0 | 2 | 8 | 3 | 5 | 7 | 6 | 77 |
| 2004 | 30 | 1 | 1 | 2 | 2 | 5 | 27 | 2 | 70 |
| 2005 | 32 | 3 | 5 | 6 | 1 | 11 | 29 | 14 | 101 |
| 2006 | 35 | 0 | 1 | 8 | 4 | 18 | 35 | 3 | 104 |
| 2007 | 35 | 2 | 2 | 9 | 8 | 16 | 17 | 3 | 92 |
| 2008 | 72 | 1 | 11 | 32 | 6 | 20 | 34 | 4 | 180 |
| 2009 | 48 | 1 | 0 | 11 | 17 | 69 | 21 | 6 | 173 |
| 2010 | 38 | 0 | 2 | 20 | 19 | 38 | 29 | 8 | 154 |
| 2011 | 16 | 0 | 2 | 4 | 4 | 56 | 23 | 2 | 107 |
| 2012 | 14 | 2 | 1 | 2 | 7 | 29 | 27 | 5 | 87 |
| Total | 839 | 22 | 42 | 163 | 114 | 417 | 439 | 77 | 2113 |

Source: HRAC analysis of HUD data

Table 21: Number and Basis of Complaints filed with HUD: Geauga County

| | Race | Color | Religion | National Origin | Gender | Familial Status | Disability | Retaliation | Total |
|-------|------|-------|----------|-----------------|--------|-----------------|------------|-------------|-------|
| 1991 | 3 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 3 |
| 1992 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 1993 | 2 | 0 | 0 | 0 | 0 | 1 | 1 | 0 | 4 |
| 1994 | 3 | 0 | 0 | 0 | 0 | 1 | 0 | 0 | 4 |
| 1995 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1 |
| 1996 | 0 | 0 | 0 | 0 | 0 | 1 | 0 | 0 | 1 |
| 1997 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 1998 | 2 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 2 |
| 1999 | 1 | 0 | 0 | 0 | 0 | 1 | 0 | 0 | 2 |
| 2000 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 2001 | 0 | 0 | 0 | 0 | 0 | 0 | 1 | 0 | 1 |
| 2002 | 1 | 0 | 1 | 0 | 0 | 0 | 0 | 0 | 2 |
| 2003 | 0 | 0 | 0 | 0 | 0 | 0 | 1 | 1 | 2 |
| 2004 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1 | 1 |
| 2005 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 1 | 2 |
| 2006 | 1 | 0 | 0 | 0 | 0 | 0 | 1 | 0 | 2 |
| 2007 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1 | 1 |
| 2008 | 1 | 0 | 0 | 0 | 0 | 0 | 14 | 0 | 15 |
| 2009 | 0 | 0 | 0 | 0 | 1 | 0 | 1 | 1 | 3 |
| 2010 | 1 | 0 | 0 | 0 | 1 | 2 | 0 | 1 | 5 |
| 2011 | 0 | 0 | 0 | 0 | 0 | 0 | 2 | 0 | 2 |
| 2012 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total | 17 | 0 | 1 | 0 | 2 | 6 | 21 | 6 | 53 |

Source: HRAC analysis of HUD data

Table 22: Number and Basis of Complaints filed with HUD: Lake County

| | Race | Color | Religion | National Origin | Gender | Familial Status | Disability | Retaliation | Total |
|------|------|-------|----------|-----------------|--------|-----------------|------------|-------------|-------|
| 1991 | 7 | 0 | 0 | 1 | 0 | 8 | 3 | 0 | 19 |
| 1992 | 4 | 0 | 0 | 2 | 3 | 7 | 0 | 0 | 16 |
| 1993 | 2 | 0 | 0 | 1 | 1 | 5 | 3 | 0 | 12 |
| 1994 | 2 | 0 | 0 | 0 | 0 | 4 | 0 | 1 | 7 |
| 1995 | 0 | 0 | 0 | 0 | 2 | 0 | 3 | 0 | 5 |
| 1996 | 5 | 0 | 0 | 0 | 0 | 3 | 2 | 0 | 10 |
| 1997 | 0 | 0 | 0 | 0 | 0 | 1 | 2 | 0 | 3 |
| 1998 | 1 | 0 | 0 | 0 | 1 | 1 | 0 | 0 | 3 |
| 1999 | 2 | 0 | 0 | 0 | 2 | 1 | 1 | 0 | 6 |
| 2000 | 0 | 0 | 0 | 0 | 0 | 2 | 2 | 0 | 4 |
| 2001 | 0 | 1 | 0 | 0 | 0 | 1 | 2 | 1 | 5 |
| 2002 | 3 | 0 | 1 | 0 | 0 | 1 | 2 | 0 | 7 |
| 2003 | 11 | 0 | 0 | 5 | 0 | 7 | 23 | 0 | 46 |
| 2004 | 8 | 1 | 0 | 1 | 0 | 1 | 7 | 0 | 18 |
| 2005 | 2 | 0 | 0 | 1 | 0 | 1 | 10 | 0 | 14 |
| 2006 | 3 | 0 | 0 | 0 | 2 | 2 | 15 | 0 | 22 |
| 2007 | 2 | 0 | 0 | 1 | 0 | 2 | 2 | 0 | 7 |
| 2008 | 3 | 0 | 0 | 0 | 0 | 2 | 16 | 0 | 21 |
| 2009 | 3 | 0 | 0 | 2 | 0 | 6 | 5 | 0 | 16 |
| 2010 | 2 | 0 | 0 | | | | | | |