

# Fair Housing Action Plan

## Introduction and Background

The City of Cincinnati and Hamilton County jointly requested that Housing Opportunities Made Equal, a Fair Housing Agency, conduct the Analysis of Impediments to Fair Housing Choice (A.I.) for the City and County jurisdictions. The A.I. was completed in May, 2009, and in the A.I., 18 recommendations were made to respond to the issues of 1) NIMBYism based on stereotypes, 2) improving choice in the Housing Choice Voucher Program, 3) predatory lending and lending discrimination, 4) discrimination against people with disabilities, 5) a lack of accessible housing, 6) discrimination against families with children, and 7) Sexual Harassment. The City and County then began a series of monthly meetings with a working group made up of staff from City Planning, City Budget, City Community Development, and County Community Development, to address the report and its recommendations, and to create a Fair Housing Advisory Committee to advise the City and County on the plan and its final recommendation.

## Fair Housing Advisory Committee

As of early January 2010, the current status of this committee is as follows:

The following representatives have been confirmed as members:

Bren Blaine, Citizen  
Herman Bowling, City of Cincinnati Community Development (Staff)  
Elizabeth Brown, Housing Opportunities Made Equal  
Andy Dobson, Regional Planning Commission (Staff)  
Debbie Greenebaum, Resident Home Corporation  
Oren Henry, City of Cincinnati Budget Office (Staff)  
Lisa Isham, CMHA  
Caroline Kellam, City of Cincinnati Planning Department (Staff)  
Kay Lyons, Center For Independent Living Options  
John Schrider, Legal Aid  
Susan Walsh, Hamilton County Community Development (Staff)

The following representatives have not yet been confirmed as members:

James Cunningham or designee, HUD  
Jeff Gatica, Federal Reserve Bank  
Karla Irvine, NAACP  
Peg Moertl or designee, PNC Bank  
Representative from Tenants United for Truth  
Charles Tassell or designee, Greater Cincinnati/Northern Kentucky Apartment Association  
Michelle Dillingham, Affordable Housing Advocates

The anticipated schedule for the committee is as follows:

1<sup>st</sup> meeting is scheduled for February 11 2010 at 9:00 a.m. Meetings will be scheduled monthly, then quarterly, then semi-annually or as needed.

The Work Plan of Committee & Timelines is as follows:

The Committee will be charged with expanding on the draft response to the identified impediments, including (1) determining goals and timelines to address each impediment, (2) resources or programs that will be used in financing the fair housing actions, (3) individuals, groups, or organizations to be involved in each action, including defining responsibilities, and (4) identifying a process for monitoring the progress in carrying out each action and evaluating its effectiveness.

The Committee should draft these responses by May 2010, and finalize the Fair Housing Action Plan by July 1, 2010.

### **Draft Responses to the A.I. Recommendations**

#### **NIMBYism based on Stereotypes**

- 1) The City and County need to work with CMHA to provide accurate information about the Housing Choice Voucher Program, including how the program works, the percentage of elderly and disabled people on the program, and the percentage employed. The communities also need accurate information on comparative rates of assisted housing concentration.

Currently the Housing Authority keeps statistics on their clientele, including statistics on numbers of elderly, disabled, and employed receiving assistance. This information is brought to the public's attention occasionally, when prompted. In addition, the local HUD office maintains a spreadsheet showing assisted housing by community and neighborhood in the City and County. The City and County would like to work with the Housing Authority and HUD to disseminate this information more widely. This could be done through a media campaign, or through other venues such as housing workshops. Assistance from the Fair Housing Advisory Committee, to be formed by the City and County, will be needed in this regard.

- 2) The City and County should support, encourage, and participate with neighborhood groups who value inclusion and welcome new neighbors.

The City and County support this recommendation, and welcome assistance from the Fair Housing Advisory Committee to help implement it. Currently the City's Neighborhood Summit and the County's First Suburbs meetings provide venues for this initiative.

- 3) The Cincinnati Planning Department and the Hamilton County Regional Planning Commission could take the lead in creating a positive image of diverse, mixed income communities.

The City and County support this recommendation, and welcome assistance from the Fair Housing Advisory Committee and the corresponding departments to help implement it. Currently the City's Neighborhood Summit, the County's First Suburbs meetings, and the Affordable Housing Advocates annual meeting provide venues for this initiative.

- 4) Elected officials and candidates should be asked to sign a pledge to refrain from inflaming racism and prejudice and to show respect for all citizens and their neighborhoods in campaign advertising and rhetoric.

The City and County support this recommendation, and welcome assistance from groups such as the Affordable Housing Advocates, the League of Women Voters, and other to help implement it.

#### Improve the Choice in the Housing Choice Voucher Program

- 5) CMHA, the City, and the County should collaborate on an active program to recruit landlords in low poverty areas and provide information and support to families with Section 8 Vouchers interested in making integrative moves.

The City currently provides funding to HOME to provide some assistance to Voucher holders to find units in low poverty areas, and to recruit landlords in these areas. The County had provided funding in the past under its Section 8 Program, but no longer operates that program. It may be difficult to provide additional funding from the City or County due to public service limits on the CDBG Program funds, but that can be explored. The County operates a tenant based assistance program with HOME funds, and recruits landlords for that program to a small extent. The City, County, and CMHA could form a working group to discuss this collaboration, and explore what funding may be provided from other funding sources to implement it.

- 6) The City and County should ask CMHA to refrain from actions that limit housing choice such as using tenant-based vouchers to create project-based units or seeking ways to restrict access to certain neighborhoods.

As referenced in the response to recommendation # 5, a working group made up of City, County, and CMHA representatives, along with some other stakeholders, could discuss what limitations that Housing Authority can or cannot make, the reasons behind these actions, and what incentives they can implement to expand housing choice.

- 7) The City and County should involve Section 8 tenants in community meetings, including upcoming meetings to develop a Cincinnati Comprehensive Plan and community meetings to discuss community development funding.

The City and County are supportive of this recommendation, and normally include a representative of either the Housing Choice Voucher (HCV) Program, or other CDBG or HOME funded program on their respective committees, such as the City's Community Development Advisory Board (CDAB), or the County's Community Development Advisory Committee (CDAC). In addition, now that the Tenants United for Truth group has been formed, made up of HCV clients, the City and County can invite this group to participate and comment on various plans and funding recommendations.

- 8) The City and County should work with CMHA to establish a Community Advisory Committee that includes Section 8 tenants and advocates, landlords, and representatives of communities concerned about the impact of families with Vouchers moving to their neighborhoods.

The City and County support this recommendation, and have expressed an interest in serving on such a committee. The City and County will take action to encourage CMHA to form such a group.

#### Predatory Lending and Lending Discrimination

- 9) Assertive law enforcement action is needed on fraudulent foreclosure prevention scams, the next generation of predatory lending that is targeting minority communities.

The City and County support this recommendation, and will support initiatives that will assist in this effort.

- 10) The City and County should ask the banks in Hamilton County to review their HMDA data, and where racial disparities exist to conduct self-testing and establish Mortgage Review Committees to ensure that loan originators and underwriters are not letting stereotypes and prejudice affect their decisions.

The City and County support this recommendation. The City and County plan to hold an annual forum for mortgage lenders and brokers, to discuss how they handle and update their review process, and how they will address disparities found.

- 11) The City and County should work with major lenders to place more branches in minority and low- and moderate-income neighborhoods.

The City and County support initiatives to encourage lenders to expand access to lending and banking services. In this time of cutbacks and consolidation, many banks are not expanding facilities, but if they are, we encourage them to consult with the City and County and Fair Housing agencies to determine where branches are needed. In addition, many banking services are accessible through the internet, so education and training in on-line banking could be provided by lenders to increase the accessibility to lower income and minority consumers. The City and County will encourage banks to offer alternative methods of access to low – moderate income and minority households. This discussion could occur at the annual forum with lenders mentioned in the response to #10.

#### Discrimination against People with Mental Disabilities

- 12) Training needs to be provided to government officials and local zoning boards in Hamilton County on the Fair Housing Act rights of people with disabilities and the liability of jurisdictions who violate the law.

The City and County support this recommendation. Currently, training is provided by H.O.M.E. to County personnel as needed. This effort could be expanded to include more County staff, City staff, and staff of other local zoning boards. The City and County welcome assistance from the Fair Housing Advisory Committee to help implement this initiative.

- 13) The City Planning Department and Hamilton County Regional Planning Commission should provide siting assistance programs that enable the siting of special needs housing by providing community education, dispute resolution services, and tools such as Good Neighbor Agreements.

The City and County support this recommendation, and welcome assistance from the Fair Housing Advisory Committee and the corresponding departments to help implement this initiative.

### A Lack of Accessible Housing

- 14) When the City and County issue occupancy certificates for new multifamily buildings, the inspectors should ensure that the minimal accessibility requirements of the Fair Housing Act are met. Additional training is needed to ensure the inspectors understand that under the Fair Housing Act and the Ohio Building Code, regardless of how units in covered multifamily buildings are classified, they must be minimally accessible to persons with mobility impairments.

The City and County support this recommendation, and will work with H.O.M.E. and other trainers and the corresponding departments of the City and County to implement this initiative.

- 15) The City and the County should expand their programs that provide accessibility modifications for existing housing to serve renters as well as homeowners.

The City and County support this recommendation, and will look into funding availability and research program design, to determine the feasibility of this program. The City and County will work with organizations that assist renters with disabilities to determine need, scope, and final program design.

- 16) Information on accessible rental units needs to be made more readily available.

The City and County support this recommendation, and welcome input from the Fair Housing Committee and organizations that assist persons with disabilities, to implement this recommendation. The County currently encourages use of HousingLocator.org for clients in the Tenant Based Rental Assistance Program, which can note this in the database.

### Discrimination against Families with Children

- 17) A significant marketing campaign could open the housing market to families by raising public awareness that housing discrimination against families with children is illegal. It

would encourage parents who experience discrimination to call HOME and would educate the small landlords who receive no professional training.

The City and County support this recommendation, and welcome input from the Fair Housing Advisory Committee, and Affordable Housing Advocates, to implement this initiative.

### Sexual Harassment

- 18) Educate female tenants that sexual harassment by landlords is illegal and should be reported to HOME. Target the message to female university students and Section 8 tenants who are particularly vulnerable because of their age and low-income.

The City and County support this recommendation, and welcome input from the Fair Housing Advisory Committee, and Affordable Housing Advocates, to implement this initiative.