



Fair Housing Assessment Summary of Findings

City of Cincinnati and Hamilton County

October 2019

Prepared by the Community Building Institute
for the City of Cincinnati and Hamilton County





This Hamilton County region has celebrated many successes in the decade following The Great Recession and housing crisis.

We have successfully attracted new people, jobs, and investment back to the urban core.

We have made great strides at creating more inviting urban spaces.

We have beautiful suburban communities.

While the region has experienced successes, we are leaving lots of our neighbors behind and this will not change without significant, intentional, sustained effort – effort that will mean we have to change how we allocate resources, and address long term socioeconomic issues.

This summary and the Fair Housing Assessment report outline actions needed to ensure fair housing issues and related contributing factors are overcome in Cincinnati and Hamilton County.

Hamilton County - 810,000 residents

Neighbors in protected classes* in Hamilton County...

203,000 Black Residents

20,000 Latino Residents

31,000 Other Non-white Residents

50,000 Neighbors with ambulatory difficulties

54,200 Live in the most depressed, disinvested neighborhoods

75% of them Black

7,122 of them families with children

8,465 Households were evicted between 2014- 2016

7,197 of our neighbors were homeless in 2017

** All numbers are for Hamilton County. The Fair Housing Act of 1968 prohibits discrimination on the basis of race, color, religion, sex, handicap, familial status or national origin.*

About the Fair Housing Assessment

The City of Cincinnati, Hamilton County, Housing Opportunities Made Equal (HOME), and housing partners in the region have an interest in ensuring that Fair Housing laws are enforced and that protected class households can find stable, affordable housing that fits their needs in the places they want to live.

When safe and appropriate housing is available to all, it improves the quality of life for everyone in the region and strengthens the economy in direct and indirect ways.

In order to assess the state of the housing market in the region and to assess different households' ability to find adequate, affordable housing, the federal Department of Housing and Urban Development requires political jurisdiction to conduct an assessment every five years. The following is a summary of the findings for the period between 2014 and 2019.

The complete report is available here: [**http://bit.ly/fairhousing2019**](http://bit.ly/fairhousing2019)

Housing Trends

As Hamilton County and the City of Cincinnati emerge from The Great Recession of 2007 to 2009 and the associated housing crisis that followed, much of the County has fully recovered and is in a stronger position than prior to 2007.

This recovery has not been felt equally in all parts of the County. Communities that have not fully recovered are more likely to be home to protected class households and in some cases, communities are facing more challenges today than they were in 2007.

The urban revitalization of Cincinnati in neighborhoods like Over-the-Rhine, the Banks, and Walnut Hills has helped the urban core evolve into a bona fide destination point for residents, businesses, and visitors. Midwestern cities across the country are looking to Cincinnati as a model for harnessing the trend towards urban living and maximizing its economic benefit. Investments in historic building stock, infrastructure, parks, and community spaces has been key to the success of this process. Leadership from the City, County, and private, institutional, and non-profit partners has been critical. These gains have created new economic opportunities and strengthened housing markets. In some areas, this has brought a loss of affordable housing and displacement of protected class residents from communities they have called home for decades.

The challenge successful cities face is to take advantage of current market conditions to grow their economies, while at the same time protecting vulnerable residents from displacement due to economic pressures, and ensuring they benefit from revitalization. When areas with historically affordable housing stock experience a significant uptick in investment and development, lower- and moderate-income households may no longer be able to afford to remain in their neighborhoods.





Balancing Growth

For much of the past 30 years central cities and counties in the Midwest, including Cincinnati and Hamilton County, have struggled to stem the tide of population loss and decline, to retain the middle class, and to attract private investments in economic and community development. Most community development resources and incentives are designed to accomplish these goals. These strategies and tools, along with favorable market forces, have had a positive impact. People, jobs, and investments are returning to Cincinnati and Hamilton County.

Nationally, as housing markets have recovered and housing costs have increased, wages have not kept pace. In Hamilton County, the households most impacted by rising housing costs are those with the lowest incomes. A recent study found there were more than 40,000 Hamilton County households with incomes of 30% or less of Area Median Income (AMI) living in housing that was not affordable to them - which means 72% of these very-low income households were cost burdened. Across all income levels, there were nearly 100,000 households that were cost burdened.

This current affordable housing shortage exacerbates the problems experienced by protected class households as they try to find appropriate housing in places they want to live. While housing discrimination and housing affordability are separate issues, they are tightly intertwined and responding to one requires responding to the other.

Resources to create and maintain affordable and supportive housing at the local, state, and federal level have continued to decline. The shortage of affordable housing we are currently experiencing is years in the making. Decades of racial discrimination, redlining, changes to Federal funding and policy regarding affordable housing, low-wages and growing income inequity, years of deferred maintenance of aging housing stock and a housing and foreclosure crisis have all conspired to create this acute affordable housing shortage.

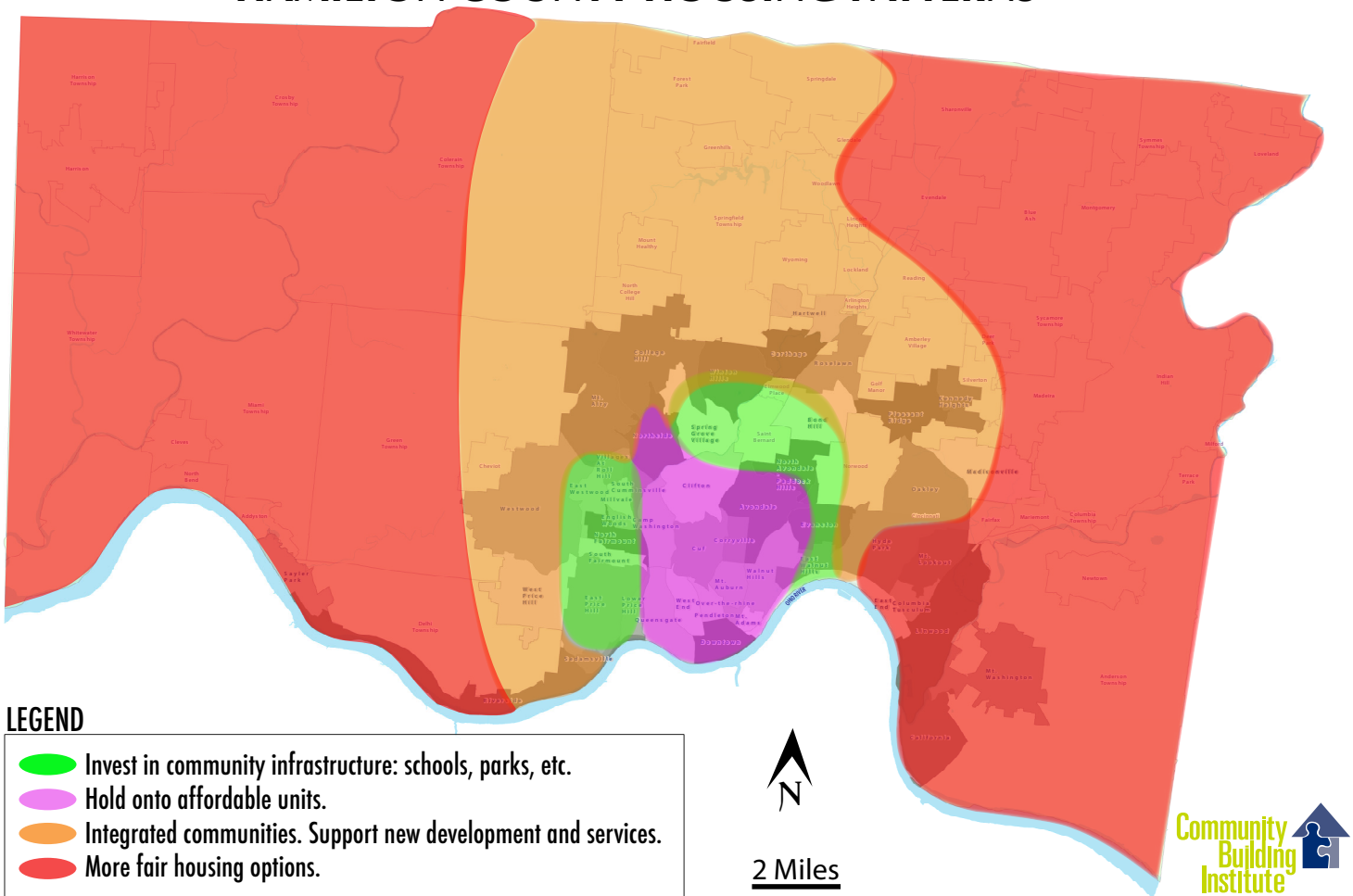
The City and County now face a huge mismatch between community development resources and infrastructure designed to create markets and those that are needed to create and sustain affordable housing. Consequently, with limited resources and infrastructure devoted to affordable housing, it is difficult to respond to the impacts of successful community and economic development efforts to strengthen depressed housing markets. These impacts include higher income households displacing lower income residents in neighborhoods, and changing the essential character and culture of that neighborhood. The tools we need have atrophied or no longer exist at the federal level, limited local resources have not kept up with inflation, and political forces have lined up against one another instead of working together on fair and equitable outcomes.

Hamilton County Trends

The map below indicates four distinct areas of the County with specific trends and issues. The Downtown/Over-the-Rhine, basin and Uptown markets of Cincinnati are stabilizing and attracting new public and private investments. Suburban markets, particularly on the eastern and western sides of the County have fully recovered from the recession. Historic segregation and poverty patterns are changing as more Black households move into suburban locations on the west side of Cincinnati and the north and north central parts of Hamilton County. However, the Lower Mill Creek communities and other Racially/Economically Concentrated Areas of Poverty (R/ECAP) continue to see persistent poverty and lack of opportunity.

The Cincinnati region has been identified over the years as a metropolitan area that is among the most segregated in the Country, according to the racial/ethnic dissimilarity index used in the Decennial Census. While segregation briefly improved over the previous decades for the Greater Cincinnati region, census data indicates segregation has worsened in the last decade. Current indexes of

HAMILTON COUNTY HOUSING PATTERNS



segregation indicate the region is considered very segregated and that after several decades of positive improvement Cincinnati, Hamilton County, and the Greater Cincinnati have gotten worse in the last decade. Furthermore, Hamilton County lost all ground it had gained between 1990 and 2010.

Communities in the north and north central parts of Hamilton County and Cincinnati represented in brown that have remained stable, integrated communities with healthy housing markets and schools, which have supported diverse populations for decades. However, many of these integrated communities are less fiscally stable than they were ten years ago. (**See Appendix I – Hamilton County ICMA Fellowship Data, Tom Carroll**) They struggle to keep property maintenance standards intact, residential property values stable, and school performance high as increasing numbers of poor families move into their communities. In order for these communities to continue to serve as welcoming communities of opportunity, they are going to need support to address growing poverty and declining public revenues.

The areas shown in red are mostly suburban communities that lack housing options for the protected classes. These communities are racially segregated with most communities having a Black population in the single digit percentages (Source: US Census 2013-2017 American Community Survey). Those on the east side have all recovered from the 2008 recession and most are in a stronger position today than they were in 2007. While this is true for some of the suburban communities on the west side, it is not true for all of them. Delhi Township and Whitewater Township show market weakness and growing poverty.

Areas in downtown and Uptown Cincinnati, shown in purple, are in transition. New public and private investments in infrastructure and commercial and residential investments are changing markets and generating jobs. Quickly rising housing prices in some places are displacing long-time residents and reducing the number of available affordable units. From focus groups, these changes are disproportionately effecting Black households and low- and moderate-income households.

Ringed these areas of Downtown and Uptown Cincinnati are several neighborhoods shown in green with long-term persistent poverty that provide limited opportunities for residents. These areas face significant housing insecurity and other significant barriers to upward mobility.

In order to expand the choices protected class households have to find safe, affordable, desirable housing in Hamilton County, all communities need to be supported in becoming better options for protected class households.

The cluster of communities in the north central parts of Hamilton County feature economic and housing market results that are mixed and are becoming far more diverse. They are providing some of the best opportunities for protected class households that are looking for high quality housing in places that feel welcoming to them. Small 900 to 1,200 square foot single-family homes throughout the County that have the potential to be a great source of affordable, accessible, “visitable” housing that can be lived in or visited by people who have trouble with steps or who use wheelchairs or walkers. When these units are in good physical condition and in proximity to public transportation, they provide a great option for protected class households. These communities also struggle with increases in poverty, declining property values, and declining tax bases. **These north central Hamilton County communities need to be supported with catalytic investments that create economic development opportunities, strengthened housing stock, and support community assets like parks, community business districts, and schools.**

Large portions of the County in suburban communities to the east and west, and in City neighborhoods largely on the east side of Cincinnati have remained inaccessible to protected class residents for decades. This pattern of segregation is the result of historic zoning, and lending practices and a long history of discrimination. While some of these communities are working to be more inclusive, these long-term patterns persist. In order to open these communities to more diversity, intentional changes to zoning codes, lending practices, project support for higher density development, and community engagement will be necessary. These communities are an important part of the equation to making Hamilton County a more diverse welcoming place. **New and different kinds of housing will be needed for protected class households in these suburban communities, along with better access to public transportation and intentional efforts to create social networks that are welcoming and supportive.**





Discriminatory Behaviors

The most overt discrimination identified in this research was against young people, young families with children, and people with disabilities.

People reported property owners directly saying they did not want to rent to these households and cited protected class characteristics as the reason. This implies these property owners either do not understand the law, or do not think they will be held accountable. Housing Opportunities Made Equal (HOME) reported that the most common cases of discrimination they have had in the last five years were instances of households with accessibility difficulties not being able to get accommodations. Young people between the ages of 18 and 24, particularly those aging out of the foster care system, also reported some blatant discriminatory behavior in focus groups. This discrimination is very often not officially reported because young people don't expect that reporting problems will result in any meaningful change. Female-headed households with young children also report instances of discrimination. These are also often not officially reported because moms fear their housing instability could result in losing their children.

There is another kind of discriminatory, “disadvantaging” behavior that harms protected class households in the City and County townships, villages, and cities.

Poor property conditions in units available at affordable prices and rented to low-income households, including immigrant and refugee families, create unhealthy, unsafe living conditions for many.

The more people there are in the market competing for units that are affordable means that people are willing to put up with very poor living conditions for fear of becoming homeless. Poor property conditions are often not reported because residents don’t understand the system, don’t believe their complaints will result in changes, or worse, believe their complaints will lead to an eviction. These beliefs are based on real experience with all three.

Systematic discriminatory behavior based on social structures, market dynamics, and racism is not always as simple as someone reporting a case of a property owner refusing to lease a unit. It is very difficult to hold any one person or organization accountable for these kinds of structurally discriminatory systems.

Creating more equitable systems that ensure reasonable housing options for everyone in Hamilton County in places they want to live will take significant changes to public and private systems that interact to create the existing market.

Currently, a majority of the County is not accessible to protected class households, adequate public transportation does not serve the majority of the County, and the number and location of affordable housing has not kept up with demand. **Transportation, lending practices, code enforcement, zoning, and public resources and incentives will all need to change to create a more equitable community.** These kinds of changes often seem so big that we fail to act, allowing discrimination and inequity to persist.

Recommendations

The recommendations that follow are designed to make efforts big and small to increase the number of affordable housing units in the region, to better protect vulnerable households, to reduce discriminatory practices, and to move us along the path toward a more equitable community.

Cincinnati and Hamilton County have demonstrated their ability to face and overcome challenges. Thirty years ago, the challenge we faced was population decline. Strategies have been enacted to slowly but surely attract people and investment back to Cincinnati and Hamilton County.

The recommendations fall into two categories: Systems and Resources.

The first set is intended to provide guidance on where to invest limited resources in ways that maximize what we can achieve, and to understand that the scale of the problem will mean an intentional redistribution of some resources from market rate solutions to supporting low-income and protected class households.

The second set is designed to address the systems at work that disadvantage protected class and low-income households. These households would be better able to provide for their families if they were not fighting systems that constantly work against them.

Summary of Recommendations

Resources

Establish a city and a county affordable housing trust fund(s)

Support catalytic economic and community development investments in north central Hamilton County

Support regional and community-based organizations who create and support affordable housing

Support agencies which protect vulnerable households

Systems

Expand public transportation

Create more lending products that work for protected class households

Improve housing crisis response

Engage in active, consistent professional code enforcement

Change zoning codes to open new areas to protected class households

Resources needed to make a measurable difference

Establish a city and a county affordable housing trust fund(s)

Cities and regions across the country are pledging millions of dollars to create and maintain affordable housing in places where the market is no longer adequately keeping up with demand. This need is heightened because federal funds for this purpose are declining significantly and because private market property owners are able to command higher rents in strengthening real estate markets, and because as properties age and are not maintained, they are no longer livable and are being demolished. The scale of this problem demands that significant resources be dedicated to this purpose.

Over the next several years both the City and the County should be aspiring to make up to \$10 million available annually until the need is reduced.

Support catalytic economic and community development investments in north central Hamilton County

The communities in north central Hamilton County (in both the City of Cincinnati and Hamilton County) have affordable housing, both rental and ownership, and they have social networks that have included Black families and immigrant and refugee families for decades. **These are mostly small political jurisdictions that have a difficult time generating the funds necessary for catalytic economic and community development projects. The region needs to support these communities and provide resources for the kinds of projects that can improve the trajectory of these places so they stay welcoming communities of choice.**



Support regional and community-based organizations who create and support affordable housing

Regional development organizations like the Port, the Hamilton County Landbank, Homesteading and Urban Redevelopment Corporation (HURC), Cincinnati Metropolitan Housing Authority, Local Initiatives Support Corporation (LISC) of Greater Cincinnati and Northern Kentucky, Habitat for Humanity Greater Cincinnati, Volunteers of America, Working in Neighborhoods, the Housing Network of Hamilton County, and the myriad of private and non-profit agencies working to provide stable, supportive affordable housing options should be supported to maximize production.

Community-based community development corporations (CDCs) and other kinds of community and housing organizations play an important role in comprehensive community development. They provide and maintain affordable housing, engage residents, are accountable to them, and help create positive local change. When these organizations are well staffed and properly resourced, they can accomplish great things in the communities where they work. We do not necessarily need to create more CDCs, but **we need to support those that are doing good work and encourage them to work in more communities.**

Support agencies which protect vulnerable households

There is an existing network of organizations that support vulnerable protected class household, including the Legal Aid Society of Greater Cincinnati, Housing Opportunities Made Equal (HOME), Community Action Agency (CAA), Freestore Foodbank, Urban League of Greater Southwestern Ohio, Talbert House, Strategies to End Homelessness, Greater Cincinnati Homeless Coalition, Lighthouse Youth Services, St. Vincent DePaul, Catholic Charities Southwestern Ohio, and many others. While the right long-term solution to issues these organizations work on is that all households should have the resources and the capacity to support themselves, we are a long way from that today. **These organizations need to be adequately resourced to follow their missions, and then held accountable for agreed upon outcomes.**



Actions needed to change our **Systems**

Expand public transportation

Much of Hamilton County remains off limits to protected class households who need public transportation. Access to public transportation is poor in many communities because service is limited, routes are not well designed, and location stops are restricted.

Access to reliable public transportation needs to be extended throughout Hamilton County and to employment and other opportunities throughout the region.

Create more lending products that work for protected class households

Access to capital for mortgages and home improvement loans remains a challenge for protected class households. Access to good, affordable home ownership opportunities are often limited because people cannot get appropriate loan products. The housing crisis and the following tightening of credit standards has only made an already difficult situation worse.

There are thousands of single-family homes in Hamilton County available for sale for under \$100,000. This could translate into monthly housing expenses of under \$800 a month and provide very affordable options for people.

Banks are often unwilling to lend smaller mortgage amounts, or make loans for purchase and rehabilitation. These issues, along with racial disparities, as evidenced by Home Mortgage Disclosure Act (HMDA) data, and people with poor credit histories, all conspire to limit access to capital in communities that would be great options.





Improve housing crisis response

Being evicted, unable to find housing you can afford or becoming homeless are among the most traumatic, chaotic, stressful, destabilizing situations a household can endure. This is the definition of a crisis for a family. When a household is in the midst of this kind of situation, they need immediate support. The current network of help lines, support services, and intake systems designed to support these most vulnerable households are tremendously overburdened, in part due to the lack of affordable housing units.

During focus group meetings, vulnerable households reported feeling abandoned by the systems that are designed to help them at this critical “intake” moment. There needs to be a better way to humanize this process and provide a more effective response to households in crisis.



Engage in active, consistent professional code enforcement

Poor property conditions in units that are rentals and owner-occupied units is a huge problem for protected class households. Lack of access to capital, as described above, is part of the problem. Unscrupulous property management practices by large Real Estate Investment Trusts (REITs), who now own significant numbers of multi-family and single-family homes in the region, is another. There are also smaller rental property owners, some who are local and some who are not, who are not properly maintaining their properties.

Active, consistent, professional code enforcement is a critical part of what it takes to manage these kinds of units.

In small political jurisdictions, this function is often a part-time position. In bigger cities, competing interests often limit resources.

In all of these places, good code enforcement is the only protection many protected class households have to ensure their units are safe and healthy. Helping shore up this function of government is important to safe sanitary housing and to protection vulnerable households.

Change zoning codes to open new areas to protected class households

Zoning codes and land use decisions often constrain housing choices in communities. Many of these codes and plans have been in place, and unchanged, for decades. Restrictive single-family zoning districts, large lot size requirements, onerous planned unit development regulations, and hearing processes often constrain housing variety in a place.

These regulations are enacted to protect property values, but they also sometimes effectively limit choice and options for protected class households. Jurisdictions in the County with these kinds of restrictive codes should be encouraged to eliminate restrictive provisions and seek to expand options for their residents and be more welcoming to new residents.

Elected and appointed officials should be supporting expanded housing options throughout Hamilton County and supporting organizations and jurisdictions that pursue them.





For more information on fair housing please contact the City of Cincinnati and Hamilton County:

Aisha Tzillah

**Community Development
Administrator**

City of Cincinnati Department
of Community and Economic
Development

805 Central Avenue, Suite 700

Cincinnati, Ohio 45202

Aisha.Tzillah@Cincinnati-Oh.gov

(513) 352-4982

Joy M. Pierson

**Community Development
Administrator**

Hamilton County Planning +
Development Department

138 E. Court Street, Room 1002

Cincinnati, OH 45202

joy.pierson@hamilton-co.org

(513) 946-8234







