

**ANALYSIS OF IMPEDIMENTS
TO
FAIR HOUSING CHOICE
MIAMI COUNTY
UPDATE JUNE 2010**

**Prepared by: Nikki Reese
Miami County Community Development Program Manager**

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INTRODUCTION/ SUMMARY

Miami County conducted a comprehensive AI Update in 2006, which analyzed the following areas:

- 1.) Provision of financing assistance for residential real property purchases, construction, improvements, repair or maintenance of a dwelling
- 2.) Terms, conditions, or privileges of sale or rental of a dwelling
- 3.) Advertising with respect to sale or rental of housing and Realtor Practices
- 4.) Appraisal Practices
- 5.) Access to any multiple listing services, real estate brokers association, or facility relating to the business of selling or renting dwellings

The information provided within the 2006 AI Update regarding the aforementioned areas remains correct today, and is herewith submitted.

This 2010 AI Update was formulated with the most up to date information including, but not limited to the American Communities Survey 2005 & 2006 Results regarding Miami County and was compiled by Nikki Reese, Miami County Community Development Program Manager. Through the Miami County Fair Housing Committee, Miami County Continuum of Care, and feedback from other public and private organizations, nonprofit organizations as well as local citizens, Impediments to Fair Housing Choice have been identified and solutions formulated.

According to HUD's Fair Housing Planning Guide-Volume I, the Analysis of Impediments to Fair Housing Choice Report should assist in building public support for Fair Housing efforts. Additionally, HUD provides that:

"The principles embodied in the concept of 'fair housing' are fundamental to healthy communities and communities must be encouraged and supported to include real effective fair housing strategies in their overall planning and development process, not only because it is the law, but because it is the right thing to do" ¹

An impediment to fair housing choice is a barrier or hindering factor that exists due to actions, omissions or decisions: public or private, that have the effect of limiting or diminishing equal access, availability and treatment concerning residential housing for members of protected classes.

Miami County has identified two (2) additional impediments to Fair Housing Choice. Progress in rectifying the four (4) impediments originally identified will be enhanced by focusing attention on these additional impediment areas and by continuing to provide educational outreach and advocacy concerning relevant issues that effect housing choice locally to, with, and for a mix of both public and private organizations and citizens.

¹ U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity, *Fair Housing Planning Guide, Volume I*. Washington D.C.: March 1996. p. 1-3.

The U.S. Department of Housing and Urban Development (HUD) Office of Fair Housing and Equal Opportunity (FHEO) administers the Fair Housing Act and jointly enforces it with the United States Department of Justice (DOJ). In Ohio, it is the responsibility of the Ohio Department of Development (ODOD) Office of Housing and Community Partnership (OHCP) to oversee that mandated Fair Housing requirements be carried out by each jurisdiction. The Ohio Civil Rights Commission (OCRC) is the lead enforcement agency in the State of Ohio. The Miami County Economic and Community Development Department's Fair Housing Office carry out mandated Fair Housing programming on the local level.

The **Federal Fair Housing Act** is codified at 42 USC Sections 3601 – 3619, and for the State of Ohio in Chapter 4112 of the Ohio Revised Code. The following are **protected classes** under each codification:

Familial Status: - Including children under the age of 18 living with parents or legal custodians; pregnant women and people in process of securing custody of children under the age of 18. This is the largest protected class in Miami County.

Disability Status: An individual person or a household that includes a person with a mental or physical impairment, disability or handicap.

Race: Refers to an ethnic group with which a person identifies.

Color: Refers to skin tone.

National Origin / Ancestry: Refers to an individual's heritage or lineage.

Religion: Refers to an individual's spiritual affiliation or attitude.

Sex or gender: This status refers to the human biological classification; male or female.

Military Status: This status refers to an individual who is in the United States Armed Forces.

IMPEDIMENTS TO FAIR HOUSING CHOICE / RESULTS OF ACTIONS UNDERTAKEN BY MIAMI COUNTY TO REMEDY IDENTIFIED IMPEDIMENTS

Impediments as identified in the 2004 Miami County Community Housing Improvement Strategy (CHIS) and FY 05, FY 06, FY 07, FY08, FY 09, and FY 10 Updates are:

- 1. Predatory Lending / Foreclosures**
- 2. Lack of knowledge of existence of Fair Housing Laws / Program**
- 3. Lack of safe, decent, affordable housing for people within protected classes**
- 4. Lack of resources to provide Fair Housing Program Initiatives/ Enforcement above minimum requirements**

As listed within Miami County's Fair Housing Action Plan 2006-2011 and with careful observation and consideration, Miami County is adding the following items as official impediments to Fair Housing Choice for added emphasis:

- 5. Lack of Consumer Advocacy/ Financial Education Initiatives or Programs**
- 6. Lack of an active Community Development Corporation or Community Housing Development Organization fully operating for/within Miami County**

Lack of Consumer Advocacy/ Financial Education Initiatives or Programs – Impediment five (5)

There are no homebuyer purchase or refinance classes / counseling, home equity reverse mortgage counseling, credit / credit repair counseling or foreclosure intervention services in Miami County.

Certain budget counseling/ mentoring is offered through faith-based groups. No individualized credit or other financial counseling is offered to the general public by any nonprofit agency other than through a handful of faith based groups or by agencies offering services to mentally disabled individuals.

The Ohio State University Extension Miami County Office provides a basic financial literacy class, entitled "*New \$start for Financial Success*", to residents who are undergoing bankruptcy. The class is required to be completed by citizens prior to a bankruptcy being granted and is provided in a two (2) hour group session. The County Extension is offers the Family & Consumer Science Program. This is an extensive program offering assistance to the community in the following areas: Balancing work & family; Aging & understanding Concerns of the elderly; Positive Parenting; Single Parent families; Stress management; Time management; Money management; Food & nutrition ; and Food Safety & Prevention.

The Miami County Community Action Council / Metropolitan Housing Authority has begun the process of designing a homebuyer counseling program that would meet or

exceed the newly published National Industry Standards for Homeownership Education and Counseling and in accordance with HUD Handbook 7610.1. Sources of staff and funding have not yet been established. The agency must operate a housing counseling program according to HUD specific guidelines for an entire year before it can apply to become an approved HUD Homebuyer Counseling Agency. With HUD approval, the agency would be eligible to apply for direct HUD Homebuyer Counseling Agency funding. Meanwhile, public awareness and community support including financial contributions will need to be garnered in order for the agency to launch and run a program for approximately one to two years, prior to gaining HUD approved status.

The Piqua Y.W.C.A. provides a financial planning workshop designed specifically for women. Numerous faith-based organizations have also recognized the need for financial education, assistance, and support specifically for single women with children and have responded by providing services on various levels. Partners in Hope, Shelter the Children, Miami County Right to Life and many local churches provide assistance and/or support on various levels from classes to direct mentoring for single female parents.

In 2008 Troy Community Works! (TCW!), a local non-profit community development corporation dedicated to sustaining the vitality, stability and value of our communities, began offering free foreclosure counseling to any Miami County resident for one full year. In 2009 TCW! Over 230 Miami County residents sought help for their homes with the majority of those seeking mortgage counseling. The average age of these clients is 37 years. Over half of their clients served last year are at or below Miami County's median income of \$42,000 per year. About 20% of those who receive counseling see a successful outcome.

Statistics support what the aforementioned groups ascertained in working with the public. According to the American Communities Census Survey 2006, an even broader gap in gender income exists in Miami County than the United States and/or Ohio average. In 2005, the median dollar earnings for female year round full time workers in Miami County was \$25,493; the median dollar earnings for male year round full time workers in Miami County was \$37,357: a full 45% higher than the female wages. Additionally, according to the Miami County Comprehensive Plan 2006 Update prepared by the Miami Valley Regional Planning Commission, in 2000; 20.3% of all children in Miami County lived in single parent households while 7.4% of Miami County children lived in households that did not include their parents. This indicates that families with children or the "familial status" protected class is not only the largest group of protected class members in Miami County, but that there is a substantial subgroup population within that protected class that requires additional and continuous advocacy.

The insurgence of the payday lending industry has become a detrimental factor in Miami County. According to the Ohio Department of Commerce Division of Financial Institutions, the number of active licensed payday lending storefronts in Miami County has tripled since the year 2000. In 2000, there were five (5) of those institutions and now there are fifteen (15), the latest of which was placed inside a Rent-to Own store.

In Miami County, Payday lending has been directly documented as one cause of homelessness through the Miami County Continuum of Care. Currently, 127th General Assembly Regular Session 2007-2008 introduced legislation through H.B. No. 337 and S.B. No. 207. H.B. No. 337 was introduced to amend sections 1181.06, 1315.36, 1315.39, 1315.40, and 1315.41 and to enact section 121.085 of the Revised Code to modifying terms and permissible charges under the Check-Cashing Lender Law, to establish the Financial Literacy Education Fund, to authorize the Director of Commerce to administer the fund and establish adult financial literacy education programs and to create the Small Emergency Loan Task Force. S.B. No. 207 was introduced to amend sections 1315.35, 1315.39, 1315.40, and 1315.41 of the Revised Code to modify the provisions for making a loan under the check cashing loan act.

It is noted that this is not only a localized issue and is under scrutiny by state officials and statewide consumer advocacy groups. In Ohio, there are more licensed payday lending storefronts than Burger King, Wendy's and McDonalds Restaurants combined according to information compiled by COOHIO that was directly provided by the Ohio Department of Commerce Division of Financial Institutions.

While the need for short term emergency loans is an obvious and proven financial service required for low to moderate-income citizens; no conventional lenders provide this service. It is not uncommon for interest on payday loans to be in excess of 400% A.P.R. State and regional groups are beginning to question why local financial service providers through CRA requirements would not respond to this proven need offering short-term loans (at least 30 day) with more reasonable terms and conditions.

Concentrated advocacy in this area would assist in alleviating / improving impediments number one (1) three (3) and six (6) as well.

Lack of a Community Development Corporation or Community Housing Development Organization fully operating for/within Miami County - Impediment Six (6)

Housing choice is critical for citizens to meet basic human needs and to pursue personal, educational, employment and other goals.

It is imperative to assert that community efforts must be concentrated to assist in advocating for housing choice not only for the physical and mental well being and benefit of individuals and families, but for the stability and well being of a community.

Much work is needed to bring together and organize both public and private resources to achieve community-enhancing results. The Mental Health Association of Miami County is considering taking on a more active role as a nonprofit intermediary to assist in this effort. This organization was founded in 1945 and within it's charter advocates for, facilitates and "lifts up" / or enables other public/private organizations, especially nonprofits to organize and facilitate the provision of services and efforts intended for the well being of Miami County Citizens. Through stress and depression education

management efforts, it has become clear that advocacy for services in Miami County to provide financial education and affordable housing are crucial needs for this region and the lack of current advocacy and services is detrimental for the citizens of this community.

In 2009, the Miami County Continuum of Care has started the procedure to become a 501 (c) 3 non-profit. A Planning Committee was created and the development of a 10 year Strategic Plan has begun. This non-profit will serve as a communication system of various services across Miami County.

The Family Abuse Shelter of Miami County (FAS of Miami County) has an active CHDO status and is considering various options to expand and utilize this status.

Predatory Lending / Foreclosures- Impediment One (1)

The foreclosure rate in Miami County is expected to rise higher each of the next five years in a large part due to predatory mortgage lending practices that have been taking place here for years by sub prime mortgage companies and banks based outside of Miami County. As rate terms on adjustable mortgages come due and interests rates on those loans are adjusted higher, payments will rise. More Miami County citizens will endure a housing cost burden. Some Miami County citizens will not be able to afford their current residences at a higher interest rate and will need to sell the property or refinance. A substantial number of citizens will find that their home was over appraised for the previous mortgage transaction and even with good credit, will not be able to refinance through a reputable lender, nor will they be able to sell it for what they owe on it. Others simply will not qualify for other financing.

With the passage of HB185 and concerted efforts of the Ohio Attorney General, Ohio Treasurer, and Ohio Department of Commerce, new predatory mortgage lending is currently being curtailed. However, with many county citizens, especially elderly citizens, remaining equity rich and income poor, educational efforts concerning Home Equity Reverse or Conversion Mortgages, and other types of mortgage loans will be necessary to preserve and /or enhance and promote homeownership.

The Homeownership Preservation Foundation is the one resource that may assist some citizens facing foreclosure, however, a local foreclosure intervention initiative is well warranted.

Below is a chart illustrating the dramatic graduated rise in foreclosure filings over the past decade. It is noted that that this table does not account the full extent of the problem/need for assistance as "short sales" and "deeds in lieu of foreclosure" are in no way documented here.

Miami County Foreclosures

Year	Number of foreclosures
2008	590
2007	578
2006	521
2005	427
2004	406
2003	423
2002	402
2001	247
2000	208
1999	174
1998	134
1997	96

- Source: Ohio Supreme Court- compiled by Policy Matters Ohio

Lack of knowledge of existence of Fair Housing Laws / Program and Lack of resources to provide Fair Housing Program Initiatives / Enforcement above minimum requirements – Impediments Two and Four (2 & 4)

Miami County established a Fair Housing Committee in 1988 to assist in affirmatively furthering Fair Housing county-wide (see Appendix A for committee members list). Members of the Fair Housing Committee have become active in sub committee groups utilizing their talents in areas of interest and expertise that assist to affirmatively further fair housing in the Miami County community.

The most active and productive subcommittee is the educational subcommittee who assisted in creating and continuing an informational booklet targeting high school seniors. This educational tool is also beneficial for all members of the community. The booklet is entitled, "Housing Rights, Facts and Options" and contains detailed information concerning the Fair Housing Act as well as specific up to date demographic information. The booklet also contains sections regarding credit, predatory lending, basic banking, the costs in Miami County to rent or own housing plus related facts, as well as an apartment checklist and a detailed helpful resources section.

The strategy in expending the most available effort and energy into the creation of an informational product geared for high school seniors is that a continuous baseline knowledge of the Fair Housing Act and other fair housing related issues will be established and eventually will become prolific throughout the community. It is also correct to assume that this group of young people will not always receive this relevant information elsewhere.

Miami County is unique in that it has one part time staff member, a Fair Housing Program Coordinator, dedicated to local Fair Housing efforts positioned within the Miami County Economic and Community Development Department. Under the current structure; however, many efforts that nonprofit groups might undertake to affirmatively further Fair Housing such as partnering with banks or other private organizations are feasible. A nonprofit Fair Housing Program effort would be flexible to more readily change initiatives/ programming/ resources /staffing than the current governmental structure and could focus more time exclusively on Fair Housing objectives.

In the last two years Miami County has held two large educational seminars focusing on what is fair housing and landlord-tenant issues; however, the attendance was extremely disappointing. There was not one Miami County resident that attended. The seminars were held both in the morning and evening to try to accommodate the working class. Also, flyers were posted in several locations and a ad in the paper advertising the event was in color to stand out and was ran for two weeks prior to the event. Miami County's Fair Housing Advisory Council has been discussing ways to increase this attendance.

Lack of safe, decent, affordable housing for people within protected classes – Impediment Three (3)

Although this region of the United States is generally one of the most affordable from a national perspective: housing affordability for renters and owners continues to be a problem within Miami County as identified in the Miami County CHIS (2004-2009) and the Miami County Analysis of Impediments to Fair Housing Choice Update 2006. Data was analyzed from the American Communities Survey 2006, prepared by the United States Census Bureau, for the purpose of disseminating the most up to date information regarding this issue and determining the extent of need within the Miami County Community.

HUD defines housing costs as causing a “cost burden” status when over 30% of a household’s gross income is expended on rent or mortgage payments and housing utility costs.

Nearly thirty percent (29%) of all owner occupied households in Miami County do not have a mortgage. However, it is noted that over eleven percent (7.8%) of households without mortgages in Miami County are cost burdened, indicating the possibility that elderly households in the community may be suffering from rising utility costs. The actual extent of this problem is likely far worse due to the fact that homeowners insurance, real estate taxes, and home maintenance are not even considered within the equation calculating cost burden.

According to the American Communities Census Survey 2006: Twenty seven percent (27%) of owner occupied housing that still have mortgages in Miami County are “cost burdened”. Twenty- percent (20%) of these, or 4081 households are more severely cost burdened, expending more than thirty five percent (35%) of their gross income on mortgage and utility costs.

Per the American Communities Survey 2006, out of 28,588 owner occupied homes in Miami County, only 7540 of them county- wide were valued at or less than \$100,000. Additionally, the housing stock in Miami County is predominantly old or very old with nearly 75% of all housing stock being 30+ years old. Out of 42,047 total housing units (apartments and single family homes), approximately 31,743 or 75% could contain lead based paint. Given the age of most existing housing, there is a relatively high rate of substandard housing, much of which is owned or rented by low to moderate-income families and individuals. Generally in housing at or prior to the age of thirty years, major housing systems such as roofs, heating / cooling systems, electric, windows, etc. need to be replaced making the affordability of safe decent sanitary housing even less likely for low to moderate income owners and renters.

Renters in Miami County, according to the American Communities Survey 2006, fare worse than homeowners in terms of enduring housing cost burdens. Out of 9681 renter occupied households, over forty three percent (43%) are cost burdened. Thirty five percent (35%) are severely cost burdened, indicating that housing costs are passed onto renters in the case of rental housing.

The Miami County Community Action Council/Metropolitan Housing Authority owns and operates 127 total housing units (public housing) where rent/utilities are set at 30% of household income. There are 498 individuals or families currently on the "waiting list".

Miami County Community Action / Metropolitan Housing Authority manages 975 Section 8 rental assistance vouchers, where rent is based on 30 % of household income, and units rented from the open market are subsidized. Currently, all Section 8 vouchers are in use and there are 1,432 individuals or families waiting to apply for this assistance equivocating to an approximate two (2) year wait for assistance. The Miami County Metropolitan Housing Authority estimates the waiting list for HUD Section 8 Program assistance to be nearly two years.

Part of the cost burden can be linked to the substantial increase in property values over the last decade. From 1990 to 2000, the median home value in Miami County increased by 69% from \$65,000 to \$109,600 per U.S. Census data. The median value from 2000 to 2005 increased another 21% from \$109,600 to \$132,900 per U.S. Census 2000 and American Community Survey 2005 data, however this data reflects the value of higher end new construction, and does not necessarily represent true median values on existing properties. Higher property costs /values equate to higher rents and mortgages.

Increases in property values are have a good effect generally for the well being of communities, however, many of the members protected classes traditionally have low to moderate incomes making disparities in income more pronounced. Members of protected classes also have the lowest rates of homeownership, leaving them out of an opportunity to build wealth.

Miami County is fortunate to have a very active local Habitat for Humanity Chapter. Habitat has partnered with many area organizations including but not limited to the Miami County Home Builders Association to assist in providing safe and decent affordable housing. Additionally, Miami County and the City of Piqua have operated very successful CHIP Programs, however, the need far exceeds current resources community wide.

MIAMI COUNTY, OHIO –DATA

(Based on the 2005 & 2006 U.S. Census American Communities Survey, 2000 U.S. Census, U.S. Department of Housing and Urban Development (HUD) FY2006 Data, The National Low Income Coalition and Policy Matters, Ohio 1995 - 2006 Data)

There are 100,220 citizens in Miami County

In 2000, Approximately 14,947 people in Miami County, under the age of five not residing in an institutionalized setting, had a mental or physical disability. In 2005, only 11,317 people under the age of five not residing in an institutionalized setting had a mental or physical disability.

A total of 91,880 Miami County Citizens in 2000 identified a specific ancestry about themselves for the 2000 Census. The largest groups were; “American”, “German”, “English” and “Irish”.

The majority race / color in Miami County is “Caucasian / white”, at 95.5%. The U.S. average is 74.7%.

According to 2005 U.S. Census Data, there are 48,641 male citizens and 51,579 female citizens in Miami County.

The 2000 U.S. Census and 2005 U.S. Census American Communities Survey did not tabulate religious preference, however, through observation and confirmed by local telephone directories, it is concluded that an active and diverse religious base exists in this community.

Income / Labor

Miami County wages per the U. S. Census 2005 American Communities Survey:

Male average wage for full time (40 hours) employment yearly: \$37,357

Female average wage for full time (40 hours) employment yearly: \$25,493

- This income disparity of 45% is substantially higher than both the State of Ohio and United States National Average.

The average unemployment rate for Miami County in 2006 of 5.5% is a similar rate to that of the Dayton MSA and the State of Ohio, but has trended above that of the Nation.

MIAMI COUNTY, OHIO –DATA

(Based on the 2005 U.S. Census American Communities Survey, 2000 U.S. Census, U.S. Department of Housing and Urban Development (HUD) FY2006 Data, The National Low Income Coalition and Policy Matters, Ohio 1995 - 2006 Data, Miami County Metropolitan Housing Authority 2006 Data, and Miami County Continuum of Care 2006 Data)

Housing Facts

The median home value in Miami County in 1990 was \$65,000: by 2000 the median home value had increased by 70% to \$109,600. The median home value in 2005 was \$132,900, however this includes the value of higher end new construction averaged in.

The majority of the housing units in Miami County, 79.2%, were built before 1979. Approximately 72.3% of this housing stock is utilized by owner/occupants and tenants utilize 27.7%.

The State of Ohio has ranked number one (1) nationally as to the rate of foreclosures for over five (5) strait years.

- Miami County Foreclosures

Year	Number of foreclosures
2008	590
2007	578
2006	521
2005	427
2004	406
2003	423
2002	402
2001	247
2000	208
1999	174
1998	134
1997	96

- Source: Ohio Supreme Court- compiled by Policy Matters Ohio

HUD defines housing “affordability” as paying out only 30% of one’s gross income on housing expenses including utilities.

HUD established for FY2010, Miami County Fair Market Rents **including utilities** as:

1 bedroom- \$565; 2 bedrooms - \$696; 3 bedrooms - \$937; & 4 bedrooms- \$1,118
HUD defines housing “affordability” as paying out only 30% of one’s gross income on housing expenses including utilities.

According to the National Low Income Coalition, in 2007, a full time worker in Miami County must make \$25,355 per year or \$12.19 per hour to afford a two-bedroom apartment in Miami County, up from needing to earn \$24,610 or \$11.83 per hour in 2006. A minimum wage worker (\$5.15/hr.) in 2007 must work 95 hours per week to afford a two-bedroom apartment up from 92 hours in 2000.

Educational Attainment Profile

The following information is based on people over the age of 25 in Miami County, Ohio, surveyed for the 2005 U.S. Census American Communities Survey and the U.S. Census 2000, broken down by percentages of population.

2000

- Graduate or Professional Degree – 5.4%
- Bachelors Degree 10.9%
- Associates Degree – 6.7%
- Some college, but no degree – 19.8%
- High School Graduates (including GED) – 39.8%
- No High School Diploma – 17.4%

2005

- Graduate or Professional Degree- 7.6%
- Bachelors Degree – 11.8%
- Associates Degree- 6.7%
- Some College, but no degree- 18.5%
- High School Graduate (including GED)- 42%
- No High School Diploma – 13.4%

Homelessness .

Currently, the Miami County CoC Steering Committee is working to provide an updated ten (10) year plan to be submitted to the State by the end of the year. The State also is requiring the CoC to designate one entity to be responsible for ensuring the correct input county wide of HMIS (HUD Homeless Management Information System) data. Currently the two entities serving Miami County that are providing this data individually due to specific grant requirements are the Family Abuse Shelter of Miami County and Community Housing, Inc. a contracted entity through the Tri County Board of Recovery and Mental Health. The Continuum will also be required to coordinate with the applicable agencies and formulate / submit to the State of Ohio a specific formal discharge strategy for moving specific groups from transitional housing to permanent housing. These specific groups include: former foster care children ages eighteen (18) to

age twenty (20), and people being discharged from health care, mental health and corrections facilities.

The Miami County Continuum of Care Point in Time Survey Homeless Count 2010 provided that 60 persons were homeless/ in transitional shelter in Miami County on January 26, 2010. 63% of the homeless persons stated they were homeless due to job loss. This number is believed to be much higher. Participation of various organizations gathering the information was minimal. The recommendations that were discussed at the March 26, 2010, Miami Continuum of Care Meeting were the following:

- Continue support for programs that are working
- Conduct a second homeless count during a different time of year
- Complete a community needs assessment
- Encourage participation of entire County

A presentation of the “2010 Point in Time Study” was provided. The data below is from the powerpoint presentation.

Homeless Individuals – Those unable to secure permanent housing (TOTAL: 60)

- Shelter – 33
- Transitional Housing – 20
- Unsheltered – 7

Persons in Emergency Shelter and Transitional Housing:

Male average age – 39

Female average age – 33

Children average age – 4

Average times being homeless – 2

Average length of homeless stay in – 46 days

Emergency Shelter

Number of families with children – 4

Number of people in families with children – 12

The breakdown by communities – Homeless and At-Risk Persons is as follows:

Troy – 49% of households

Piqua – 26% of households

Tipp City – 11% of households

West Milton – 5% of households

Remaining Miami Co. - 6% of households

Outside of Miami Co. – 3%

MIAMI COUNTY ACTION PLAN FY 2007- 2012

Impediment	Action - FY 2008	Action- FY2007- beyond
Predatory Lending / Foreclosures	Advocate for homebuyer / financial counseling with a home mortgage default counseling component to be established for citizens of Miami County. Provide Homeownership Preservation Hotline information also continue to incorporate warnings into all printed material	Ongoing- Advocacy for homebuyer/ financial counseling and foreclosure intervention Perform closer examinations concerning everyday service and CRA requirements 12 USC 2901 Implemented: 12 CFR parts 25, 228, 345 and 563e
Lack of knowledge of existence of Fair Housing Laws or Program	Continue to focus efforts on providing extensive educational outreach to Miami County High School Seniors and at all Fair Housing Symposiums	Expand educational outreach into school curriculum for lower grades
Lack of safe, decent, affordable housing for people within protected classes	Advocate for housing projects which serve members of protected classes, many of whom are in the moderate to low income range	Ongoing With home buyer counseling established, advocate for the establishment of a community development corporation to at least, act as an intermediary organization to expand housing options for members of protected classes
Lack of resources to provide Fair Housing Program / Initiatives above minimum requirements	Continue to strive for excellence in provision of the four standard component program on current budget and continue to facilitate the Miami County Fair Housing Committee	Advocate for Programming and Initiatives above and beyond minimum requirements through the assistance of other private and public agencies.
Lack of Consumer Advocacy / Financial Education Initiatives or Programs	Advocate for specific financial education programs which serve members of protected classes, many of whom are in the moderate to low income range	Ongoing Advocacy for homebuyer/financial counseling and foreclosure intervention
Lack of an active Community Development Organization / Community Housing Development Organization	Advocate for housing projects which serve members of protected classes, many of whom are in the moderate to low income range	With home buyer counseling established, advocate for the establishment of a community development corporation to at least, act as an intermediary organization to expand housing options for members of protected classes

Miami County Fair Housing Program

Five Year Action Plan

FY'10 (September 1, 2010- August 31, 2011) 2007 through 2012

- Continue to strive for excellence in provision of the four standard State of Ohio Fair Housing Program components designed specifically for compliance with Section 109 of the Housing and Community Development Act of 1974 (42 USC 5301 et. Seq.) and the Cranston-Gonzales National Affordable Housing Act (42 USC 130 Sections 202-290).
- Continue to facilitate and utilize the Miami County Fair Housing Committee in affirmatively furthering Fair Housing per Title VIII of the Civil Rights Act of 1968 as amended: otherwise know as the Federal Fair Housing Act (42 USC Sec. 3601-3619).
- Initiate education and compliance when applicable, for the seven additional federal laws and six executive orders directly mandating Fair Housing compliance within the jurisdiction and laws referencing Fair Housing such as the Home Ownership Equity Protection Act of 1994 (HOEPA) (15 USC 1639) within scope and capacity.
- Advocate for a financial education/homebuyer counseling program or service with a home mortgage default-counseling component to be established for citizens of Miami County to at least, combat the effects of predatory lending practices.
- Continue to focus efforts on providing educational outreach to High School Seniors in Miami County to promote community baseline knowledge of the Fair Housing Act.
- Advocate for housing projects and activities that serve members of protected classes that are also consistent with the U.S. Department of Housing and Urban Development's (HUD) mission and strategic goals for 2006 – 2011
- Inquire as to the performance of financial institutions operating in Miami County, as required for the Analysis of Impediments to Fair Housing Choice Report, pertaining to Community Reinvestment Act (CRA) mandated requirements (12 USC 2901 Implemented; 12 CFR parts 25, 228, 345 and 563e).

2010

MIAMI COUNTY FAIR HOUSING COMMITTEE MEMBERS

Joy Hobbs – Miami County Economic & Community Development Administrative Assistant / Fair Housing Coordinator

Nikki Reese – Miami County Economic & Community Development Manager

Jim McGarry – Miami County Economic & Community Development Director

William Lutz – Development Program Manager, City of Piqua

Lowell Yingst – Mayor of Covington

David Bollinger – President, Bollinger Enterprises

Byron Bonar – Managing Attorney, Western Ohio Legal Services

Dorothea Burton – Miami County Citizen

James Dando – Director, City of Troy Planning and Development Department

Tim Davis – Planner, City of Troy Development

Kirsten Sherk – Miami County Habitat for Humanity

Jack Evans – Commissioner, Miami County

Martin Gabbard – Municipal Manager West Milton

Barbara Holman – Director, Family Abuse Shelter of Miami County / Miami County Continuum of Care

Eileen Katzenberger – Miami County Citizen

Barbara LeFevre – Midwestern Ohio Association of Realtors

Matthew Spring – Planning and Zoning Administrator, City of Tipp City

Karen Dickey – Executive Director, The Mental Health Association of Miami County

Standard Fair Housing Program Model

COMMUNITY PARTICIPATION is cited by HUD, ODOD, OHCP, & OCRC continuously as the most important component inherently assumed to be participatory in every component of the program model.

MIAMI COUNTY FAIR HOUSING COMMITTEE serves as a complaint resolution board assisting in FAIR HOUSING ACT enforcement as well offering a volunteer and advisory base for all other program components.

EDUCATION

- * Fair Housing Symposium in each CDBG and / or HOME target area or target population
- * Fair Housing Education to elementary or high school students
- * Fair Housing Education in general civic community groups

FAIR HOUSING LOCAL CONTACT

FAIR HOUSING ACT ENFORCEMENT

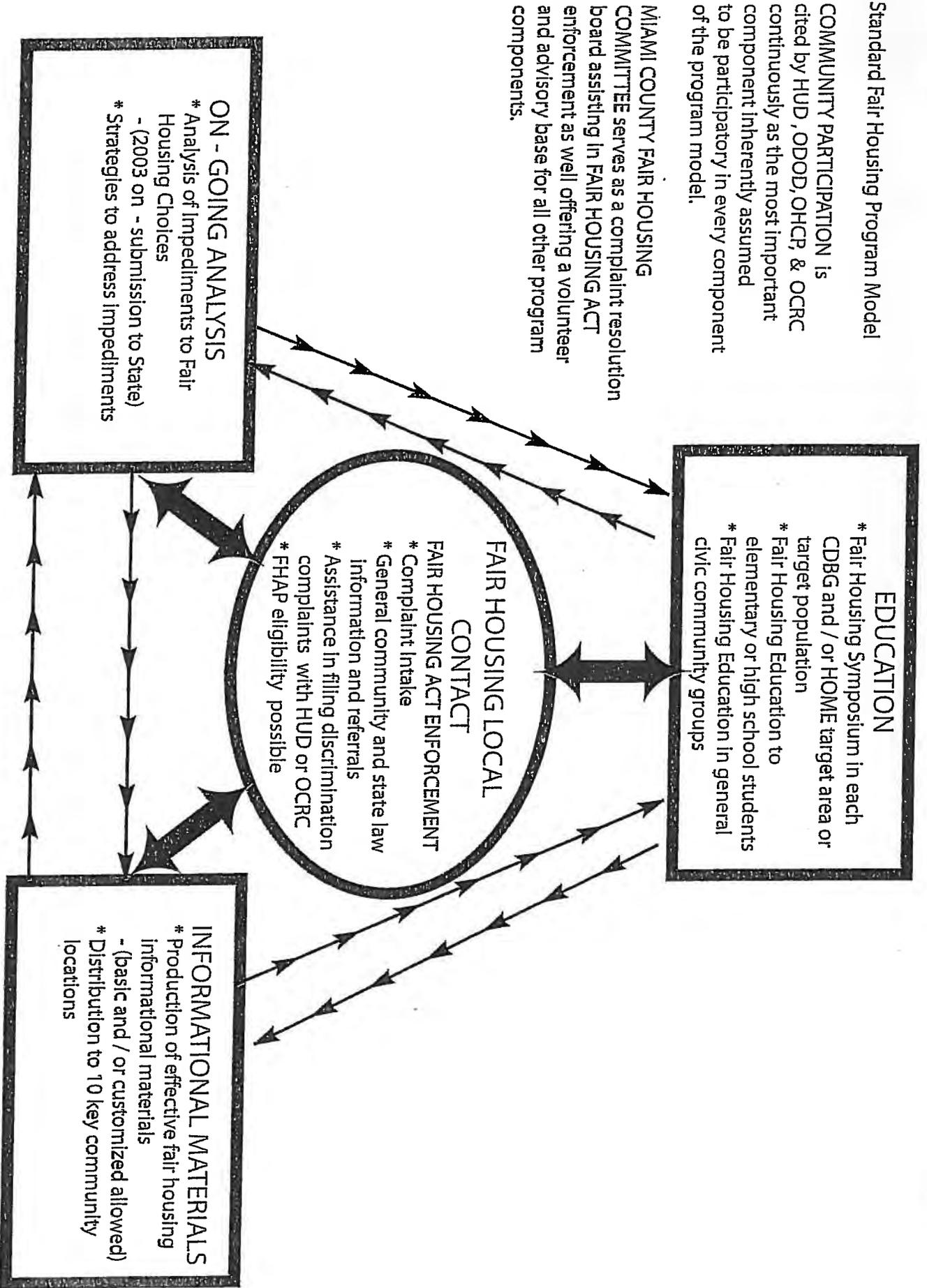
- * Complaint Intake
- * General community and state law information and referrals
- * Assistance in filing discrimination complaints with HUD or OCRC
- * FHAP eligibility possible

ON - GOING ANALYSIS

- * Analysis of Impediments to Fair Housing Choices
- (2003 on - submission to State)
- * Strategies to address impediments

INFORMATIONAL MATERIALS

- * Production of effective fair housing informational materials
- (basic and / or customized allowed)
- * Distribution to 10 key community locations





MIAMI COUNTY FAIR HOUSING
HOBART CENTER FOR COUNTY GOVERNMENT
510 W. Water Street, Suite 110
Troy, Ohio 45373-2983
Phone # (937) 440-8110
Fax # (937) 440-8124

Miami County Fair Housing

The Miami County Fair Housing Program is designed and operated in compliance with the Ohio Department of Development State of Ohio Standard Program Model. The four components of the program are:

- 1) Fair Housing Education – A Fair Housing Symposium is orchestrated in every CDBG/Home target area or target population in addition to 3 Fair Housing Educational Symposiums for local civic and community groups and Fair Housing Education to elementary or high school students.
- 2) Fair Housing Informational Materials- A variety of materials are produced including but not limited to handbooks and brochures that are designed to be effectively informational. These are distributed to at least 10 key community organizations.
- 3) On-Going Analysis – Ongoing analysis in any of the given eight areas of study is performed with specific attention given to areas identified as impediments to Fair Housing Choice.
- 4) Fair Housing Local Contact – The Miami County Fair Housing Coordinator serves as the Local Fair Housing Contact assisting and promoting enforcement of the Federal Fair Housing Act. The Coordinator performs complaint intake, conciliates remedies, provides general community and state law information and materials, and assists citizens in filing complaints with HUD and OCRC.

Within the component of "Fair Housing Local Contact", Miami County assists in enforcing the Federal Fair Housing Act.

Joy Hobbs is the designated Fair Housing Coordinator for Miami County. Ms. Hobbs handles and documents all incoming phone calls and walk in inquiries. During open hours of the Miami County Economic & Community Development Office that Ms. Dickey is not available, the Miami County Economic & Community Development staff is trained to fill out the Miami County Fair Housing Initial Intake Form for Ms. Hobbs's immediate review and follow up.

All citizens are advised of their rights and offered assistance in filing complaints directly with the Ohio Civil Rights Commission and / the U.S. Department of Housing and Urban Development, however, Miami County Citizens also benefit from a local complaint resolution service.

This complaint resolution service is performed for all citizens of Miami County including citizens of the City of Troy and City of Piqua.



MIAMI COUNTY FAIR HOUSING
HOBART CENTER FOR COUNTY GOVERNMENT
510 W. Water Street, Suite 110
Troy, Ohio 45373-2983
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Fax # (937) 440-8124

The complaint resolution process starts with the initial inquiry/ or walk- in. The Fair Housing Coordinator is engaged immediately to offer assistance. With every phone call or walk-in inquiry, the Fair Housing Coordinator begins an interview, the very first step of the investigative process. All citizens are asked if they feel they have been discriminated against on the basis of race, color, religion, gender, national origin, disability status, family status or marital status. If they clearly indicate that their complaint is nondiscriminatory, the Fair Housing Coordinator uses discretion to refer the matter to the appropriate people or agency and/or may provide informational material and minimal assistance to resolve the matter. If the citizen indicates any possible discriminatory element in the complaint, the Fair Housing Coordinator continues with the investigative process.

Citizens with potentially discriminatory complaints are again advised of their rights to file complaints directly with the Ohio Civil Rights Commission and or HUD, and are offered assistance in filing those complaints. Additionally, if the citizen indicates they are interested in using the local complaint resolution service, the investigation continues with additional details of the case and completion and signing of a Miami County local Discrimination Complaint Form. From there, a process is started by the Fair Housing Coordinator to clarify the circumstances of the case, discover factual evidence available to support the claims and to discern the true nature of the case in an effort to document and to ultimately conciliate or resolve the complaint. A copy of the local Discrimination Complaint Form is forwarded to the potentially offending party along with a Respondent Form. The Respondent Form stating facts and the position of the potential offending party is to be returned by that party within 10 days. Both parties are notified at the onset of the investigation that the Fair Housing Coordinator will conduct the investigation and will attempt to conciliate or resolve the matter through informal and /or formal methods. The Fair Housing Coordinator may at any given point, call upon the Miami County Fair Housing Committee to perform a series of informal and/or formal administrative hearings to assist in resolving the matter. The Miami County Fair Housing Coordinator prepares case notes and /or a summary documenting details of the investigation and of attempts to conciliate or resolve the matter. Both parties are advised that this is not a legal court proceeding. A written determination of desired outcome or responsive action is made with an addendum informing both parties of their right to seek other legal action. Under the recommendation of the Fair Housing Program Coordinator and / or the Miami County Fair Housing Committee, a complaint may be recommended for referral to the regional Ohio Civil Rights Commission and /or the U.S. Department of Housing and Urban Development to be resolved.

MIAMI COUNTY FAIR HOUSING INITIAL INTAKE FORM

DATE: _____ Approximate Time: _____

Name: _____

Address: _____

Phone: _____

1st Call Here? _____ yes _____ no

Additional call here- date of 1st call _____

Do you feel you've been discriminated against? _____ yes _____ no

Do you feel you've been discriminated against on the basis of:

Race (major ethnic group affiliation)

Color (skin tone)

Sex (male or female)

Religion (spiritual attitude or affiliation)

National Origin (ancestry)

Disability (physical and/ or mental disability or handicap)

Familial Status (families or heads of households with children)

YES -- person advises that they feel discriminated against

NO

NOT SURE

If YES, Please check all protected class discrimination areas listed above that may apply.

This complaint pertains to:

rental of housing

sale of housing

financing of housing

other transactions _____

Describe what happened.

FOLLOW UP / REFERRAL:

referred to Fair Housing Coordinator

mailed brochures: _____

referred to other agency(s) _____

calls to: _____

other follow up: _____

MIAMI COUNTY FAIR HOUSING
FAIR HOUSING COMPLAINT INVESTIGATION
PRELIMINARY ASSESSMENT

Case Name:

Date:

My first interview with

MIAMI COUNTY FAIR HOUSING

RESPONDENT FORM

Case name: _____

A complaint of alleged discrimination based on _____, involving an incident that occurred on or about _____ (date) involving _____ (address).

The complaint is attached.

Please review the aforementioned complaint and describe what happened from your point of view concerning the incident:

(Use the reverse side of this form if necessary)
Why did you take the action you took?

Please provide us with supporting documentation and / or witnesses / attestants:

Name	Address / Phone
_____	_____
_____	_____
_____	_____

General understandings:

1. All information will be handled with respect to confidentiality. However, information shall be shared with staff and Fair Housing Committee members, legal counsel, all parties involved in this complaint and may become a matter of public record.
2. This is an attempt to solve this complaint locally, without direct U.S. Department of Housing and Urban Development (HUD), U.S. Department of Justice, or Ohio Civil Rights Commission (OCRC) intervention based on the facts presented by both parties. The use of this complaint procedure shall not constitute a waiver of either party from seeking other legal remedies through the above listed agencies or other sources. The filing of this action does not postpone the date of timely filing of other action.

**MIAMI COUNTY FAIR HOUSING
DISCRIMINATION COMPLAINT FORM**

Case Name: _____

Complainant Name & Address:

Phone: _____

Respondent Name & Address:

Phone: _____

This complaint is based on alleging the following types of discrimination:

- Race (major ethnic group affiliation)
- Color (skin tone)
- Sex (male or female)
- Religion (spiritual attitude or affiliation)
- National Origin (ancestry)
- Disability (physical and/or mental disability)
- Familial Status (families or heads of households with children)

What is the address where the alleged discrimination occurred or the address this complaint pertains to: _____

The Federal Fair Housing Act prohibits discrimination in the sale, rental, and financing of housing, and covers other housing related transactions. What prohibited area(s) does this complaint pertain to?

- rental of housing
- sale of housing.
- financing of housing
- other transactions _____

Describe what happened and explain why you feel the actions of the other party were discriminatory. Use the back of this form if necessary.

Witnesses and/or Attestant(s) (please specify)
Name: _____ Address: _____

Phone: _____

General Understandings:

3. The Miami County Fair Housing Program Coordinator will commence an initial investigation regarding possible discriminatory practices and will attempt a series of informal and / or formal methods to eliminate possible discriminatory practices and resolve the dispute. These methods will include conference, conciliation and persuasion and may be carried out all at once, or through a step series process. This process may include administrative hearings through the assistance of the Miami County Fair Housing Committee. You will be offered an opportunity to participate in these hearings. This is not a legal court proceeding. "Conference" refers to informal discussion with the accused, to allow the exchange of opinion; "conciliation" refers to an attempt to settle the dispute in a friendly, nonantagonistic manner; "persuasion" refers to a verbal attempt to advise the accused of the Fair Housing Act and encourage their own interpretation of the law persuasive to conformity to the law and to correct the possibility of discriminatory practices and / or resolve the current dispute.
4. Regardless of participation, you will be notified of the local determination.
5. This complaint at any time may be forwarded to the U.S. Department of Housing and Urban Development (HUD), the U.S. Department of Justice and / or the Ohio Civil Rights Commission (OCRC).
6. The Ohio Civil Rights Commission (OCRC), independent of any formal filing of charges with OCRC, may make a preliminary investigation on its own initiative relating to any of the unlawful discriminatory practices set forth in the Ohio Revised Code Chapter 4112.

I declare that this response is true and correct.

DATE

SIGNATURE

Please respond to this inquiry within 10 days of receipt to;

Miami County Fair Housing
510 West Water Street, Suite 110
Troy, Ohio 45373

Please provide your preferred contact information;

Daytime phone # _____

Correct Name & Address;

MIAMI COUNTY FAIR HOUSING ACCOMPLISHMENTS 2009

Miami County Fair Housing Committee Meetings – 4 meetings were held with the average attendance of ten (10).

Miami County Fair Housing “Housing Rights, Facts, and Options” for High School Seniors Booklet was distributed to the following schools:

- Bradford High School – 200 booklets
- Troy High School – 300 booklets
- Miami East High School – 300 booklets

Fair Housing Educational Outreach for Miami County:

- “What is Fair Housing?” Training with a Power Point presentation by Byron Bonar, Attorney with Legal Aid of Western Ohio.
- Village of Fletcher Council Meeting – “Fair Housing is Your Right” brochures and “Landlord – Tenant Rights & Responsibilities under Ohio Law” booklets distributed.
- “Landlord – Tenant Rights & Responsibilities under Ohio Law” booklets and “Renovate Right Lead Hazard Information” booklets distributed to Mr. & Mrs. James Kaster, landlord in Troy.
- “Fair Housing is Your Right” brochures and U. S. Department of Housing and Urban Development Posters distributed to Family Abuse Shelter.
- “Fair Housing is Your Right” brochures and “Renovate Right Lead Hazard Information” booklets distributed to Philip Sullenberger of Sullenberger Rentals, LLC.
- “Renovate Right Lead Hazard Information” booklets given to Mr. David Pinkerton by request.
- “Fair Housing is Your Right” brochures, U. S. Department of Housing and Urban Development Posters, “Children & Housing” brochures, and “Landlord – Tenant Rights & Responsibilities under Ohio Law” booklets distributed to Miami County CAC.
- “Fair Housing is Your Right” brochures, U. S. Department of Housing and Urban Development Posters, “Children & Housing” brochures, and “Landlord – Tenant Rights & Responsibilities under Ohio Law” booklets distributed to Tri-County Board of Mental Health.
- “Fair Housing is Your Right” brochures, U. S. Department of Housing and Urban Development Posters, “Children & Housing” brochures, and “Landlord – Tenant Rights & Responsibilities under Ohio Law” booklets distributed to St. Joseph’s House.
- “Fair Housing is Your Right” brochures, U. S. Department of Housing and Urban Development Posters, “Children & Housing” brochures, and “Landlord – Tenant Rights & Responsibilities under Ohio Law” booklets distributed to Miami County Family Abuse Shelter.

- "Fair Housing is Your Right" brochures, U. S. Department of Housing and Urban Development Posters, "Children & Housing" brochures, and "Landlord – Tenant Rights & Responsibilities under Ohio Law" booklets distributed to Midwestern Ohio Board of Realtors.
- "Fair Housing is Your Right" brochures, U. S. Department of Housing and Urban Development Posters, "Children & Housing" brochures, and "Landlord – Tenant Rights & Responsibilities under Ohio Law" booklets distributed to Lincoln Community Center
- Village of Casstown Council Meeting - "Fair Housing is Your Right" brochures, "Children & Housing" brochures, and "Landlord – Tenant Rights & Responsibilities under Ohio Law" booklets distributed.
- "Fair Housing is Your Right" brochures, U. S. Department of Housing and Urban Development Posters, "Children & Housing" brochures, and "Landlord – Tenant Rights & Responsibilities under Ohio Law" booklets distributed to Troy Public Library.
- "Fair Housing is Your Right" brochures, "Children & Housing" brochures, and "Landlord – Tenant Rights & Responsibilities under Ohio Law" booklets distributed to Troy Senior Citizens Center.
- "Landlord – Tenant Rights & Responsibilities under Ohio Law" booklets distributed to City of Piqua Utilities Office upon request.