

# **State of Ohio**

## **Analysis of Impediments**

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## Executive Summary

### *Ohio Fair Housing Law*

The Ohio Fair Housing Law (Ohio Revised Code 4112.02(H)) gives all persons in the federally protected classes the right to live wherever they can afford to buy a home or rent an apartment. Ohio law also adds two additional protected classes: ancestry and military status. According to Ohio law, it is unlawful, on the basis of race, color, religion, sex, national origin, ancestry, military status, disability, or familial status to:

- Refuse to rent, sell, finance, or insure housing accommodations or residential property
- Represent to any person that housing accommodations are not available for inspection, sale, rental, or lease
- Refuse to lend money for the purchase, construction, repair, rehabilitation, or maintenance of housing accommodations or rental property
- Discriminate against any person in the purchase, renewal, or terms and conditions of fire, extended coverage, or homeowners or renter's insurance
- Refuse to consider without prejudice the combined income of both spouses
- Print, publish, or circulate any statement or advertisement which would indicate a preference or limitation
- Deny any person membership in any multiple listing services or real estate broker's organization
- Discriminate in the selling, brokering, or appraising of real property
- Deny or make different terms for home loans, such as different interest rates, points, or fees

In addition, it is illegal for anyone to:

- Coerce, intimidate, threaten, or interfere with anyone exercising their rights granted under the Fair Housing Act or assisting others who are exercising that right
- Make, print, publish, or post statements or advertisements that a house or an apartment is available only to persons of a certain race, color, religion, sex, familial status, or disability

In Ohio, the Ohio Civil Rights Commission (OCRC) enforces state laws against discrimination. The Commission receives and investigates discrimination charges – on the basis of protected class – in the areas of employment, public accommodation, housing, credit and disability in higher education.

### *Federal Fair Housing Law*

Title VIII of the Civil Rights Act of 1968, as amended, is also known as The Fair Housing Act. The Act prohibits discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions, based on race, color, national origin, religion, sex, familial status (including children under the age of 18 living with parents or legal custodians, pregnant women, and people securing custody of children under the age of 18), and disability.

The Fair Housing Act covers most housing. In some situations, owner-occupied buildings with up to four units, single-family housing sales or rentals that did not use a real estate agent or broker and

housing operated by private clubs and organizations that only allow members to occupy units are exempt from the law.

The U. S. Department of Housing and Urban Development (HUD) is the federal agency charged with enforcing the Fair Housing Act. When an individual files a complaint, HUD will notify the complainant and will also:

- Notify the alleged violator of the complaint and allow the party to submit a response.
- Investigate the complaint and determine whether there is reasonable cause to believe a violation occurred.
- Notify the complainant if HUD cannot complete an investigation within 100 days of receiving the complaint.

HUD will try to reach an agreement with the alleged violator (respondent). The conciliation agreement must protect both the complainant and the public interest. If the respondent signs a conciliation agreement, HUD will take no further action on the complaint. If, however, HUD has reasonable cause to believe that the respondent breached the conciliation agreement, it will recommend that the U.S. Attorney General file suit.

HUD requires state and local government grant recipients to certify that they will affirmatively further fair housing as part of their consolidated planning process.

HUD describes the obligation to affirmatively further fair housing as taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics.

### *Methodology*

The process for the Analysis of Impediments is a comprehensive examination of data related to housing, affirmatively furthering fair housing, housing transactions/conditions and the fair housing program's delivery system. The main sources of data for this report include 2022 American Community Survey (ACS) data and data collected from federal and state agencies that relate to demographic and housing characteristics within Ohio.

Jurisdictions in Ohio that receive funds from HUD directly are known as entitlement communities. These communities report to HUD. Data that contains information on these areas are identified. This report serves as the Analysis of Impediments to Fair Housing Choice for the State of Ohio's non-entitlement communities, which are communities that do not have a direct relationship with HUD and receive funds from the State of Ohio (Table 1). The non-entitlement communities are the focus of this Analysis of Impediments.

Table 1: Ohio Non-entitlement Counties							
Adams	Clark	Fayette	Highland	Lorain	Morgan	Preble	Union
Allen	Clinton	Fulton	Hocking	Lucas	Morrow	Putnam	Van Wert
Ashland	Columbiana	Gallia	Holmes	Madison	Muskingum	Richland	Vinton
Ashtabula	Coshocton	Geauga	Huron	Mahoning	Noble	Ross	Washington
Athens	Crawford	Greene	Jackson	Marion	Ottawa	Sandusky	Wayne
Auglaize	Darke	Guernsey	Jefferson	Medina	Paulding	Scioto	Williams
Belmont	Defiance	Hancock	Knox	Meigs	Perry	Seneca	Wood
Brown	Delaware	Hardin	Lawrence	Mercer	Pickaway	Shelby	Wyandot
Carroll	Erie	Harrison	Licking	Miami	Pike	Trumbull	
Champaign	Fairfield	Henry	Logan	Monroe	Portage	Tuscarawas	
Ohio Non-entitlement Cities							
Ashland	Chillicothe	Findlay	Marysville	New Philadelphia	Piqua	Tiffin	Xenia
Ashtabula	Defiance	Fremont	Medina	Niles	Portsmouth	Troy	Zanesville
Athens	Delaware	Marion	Mount Vernon	Norwalk	Sidney	Wooster	

### *Fair Housing Impediments*

After analyzing the compiled data for the Analysis of Impediments to Fair Housing Choice, the state identified five impediments to fair housing. These impediments are the focus of the state's action plan:

#### **1. Need for fair housing education**

Non-entitlement local governments overwhelmingly indicate that citizens in their communities lack a basic understanding of fair housing rights. Local governments noted a strong need for improved education for the general public, local government officials, social service agencies and housing providers.



**2. Lack of affordable housing**

The statewide shortage of affordable housing limits housing choice and disproportionately impacts members of protected classes, especially minority populations, families with large households, and individuals with disabilities.

**3. Lack of/or limited public transit options**

In Ohio, the need for transit options, particularly in rural communities and small cities, remains of high importance. Public transit is vital to ensuring community-members, regardless of ability, can access housing, employment, education, and essential services.

**4. Need for local policies or legislation**

Ohio communities recognize a growing need for policies or legislation on the local level intended to address issues related with fair housing. Action in a variety of policy areas can coalesce and modernize local efforts towards promoting housing access.

**5. Lack of housing availability or supply**

Communities throughout Ohio experience a lack of housing availability or supply. The unavailability of a variety of housing options, or a lack of supply, can impact a variety of other housing factors such as affordability and housing conditions.

## Section 1: State Overview

Ohio is the seventh most populous state in the nation with a total population of more than 11.78 million people. The state's population accounts for 3.5 percent of the nation's 334 million population. Ohio's population is projected to decline by approximately 675,000 (5.7%) by 2050 if current rates of fertility, mortality, and migration remain unchanged.

The median age in Ohio is 39.9 years compared to 39.2 years nationally. Since 2000, Ohio's median age increased by 3.7 years. Although the nation is aging, Ohio is aging at a faster rate. Of Ohio's total population, 18.8 percent are aged 65 years or older. As baby boomers complete their journey through the age structure, the youngest senior cohorts will decline while the population of the very oldest Ohioans will increase. The 85+ cohort will increase by nearly 25%.

Over 77 percent of the state's population lives in one of the state's nine multi-county metropolitan areas. More than 31 percent reside in four northeast metropolitan areas: Cleveland, Akron, Youngstown and Canton. Central Ohio, which includes the Columbus metropolitan area, is home to 18.5 percent of the population and nearly 22 percent live in two southwest metropolitan areas: Cincinnati and Dayton. (Map 1 and Map 2).

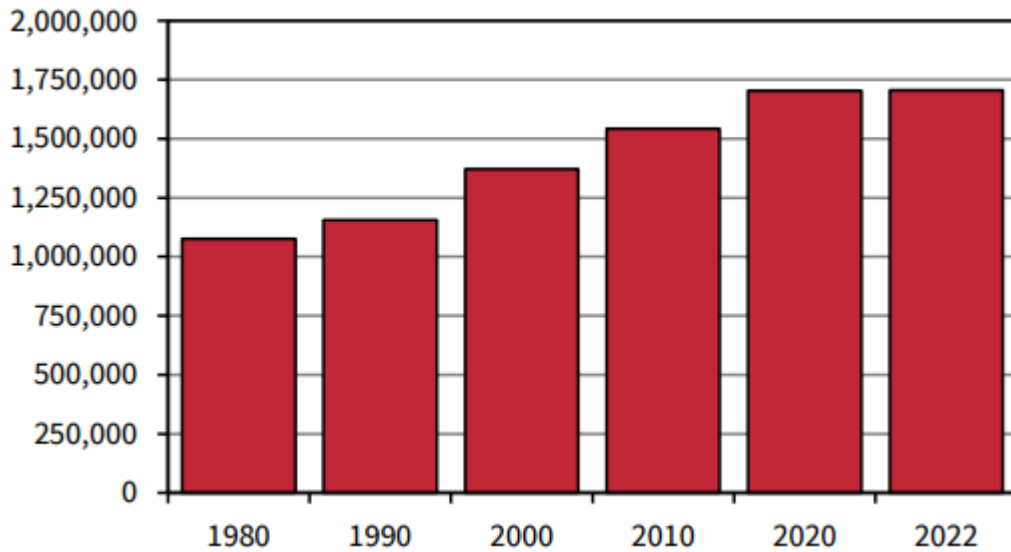
In 1965, the U.S. Congress identified counties in 13 states along the Appalachian Mountain Range as part of the Appalachian Regional Commission (ARC). In Ohio, 29 counties were named (Map 3). Mahoning, Ashtabula and Trumbull counties were added to the region in 2008 as part of the ARC reauthorization legislation. Their general location is along the Ohio River and the hill counties of southeast Ohio. Ohio's Appalachian region comprises 16.7 percent of the state's population. The Appalachian hills of southeastern Ohio are the least densely populated areas of the state, and the population is trending down. The largest city in Appalachian Ohio is Youngstown with an estimated population of 59,108 individuals. The region is 90.1 percent white.

### *Race and Ethnicity*

Under federal fair housing laws, race, national origin and color are protected classes. Ohio also includes ancestry as a protected class in state law. Nationally, minorities comprise 41 percent of the population. In Ohio, minorities make up 22 percent of the total population. Ohio's total minority population increased 4 percent since 2010 while the white, non-Hispanic population decreased 4 percent during the same time. In Ohio's Appalachian region, minorities comprise 9.9 percent of the total population.

In the United States, the African American population is more than 47.9 million, accounting for 14.4 percent of the nation's total population. Since 2000, the African American community in the U.S. has experienced an increase of more than 11.4 million persons, or 31.4 percent. Ohio's African American community is comprised of more than 1.7 million people, accounting for 14.5 percent of the state's total population (Figure 1). This percentage matches the national average on population. In 1980, there were more than 1 million African Americans comprising 10 percent of Ohio's total population. According to the 2022 American Community Survey, Ohio's African American population has increased by 24 percent since 2000. In Ohio's Appalachian region, African Americans represent 4.1 percent of the population.

**Figure 1: African American Population in Ohio**



Source: 2022 American Community Survey

Most African Americans in Ohio live in urban areas. More than one out of three African Americans in the state live in the cities of Cincinnati, Cleveland, or Columbus. In Columbus there are 288,000 African American residents; 184,000 in Cleveland; and 129,000 in Cincinnati. The Cleveland metropolitan area alone is home to more than 25 percent of Ohio's African American population.

**Table 2: 2022 African American Population by County**

Largest Total African American Population		Largest Percent of County Population	
Cuyahoga	398,702	Cuyahoga	32.3%
Franklin	361,981	Hamilton	28.6%
Hamilton	235,830	Franklin	27.4%
Montgomery	128,089	Montgomery	24.0%
Lucas	99,521	Lucas	23.3%
Summit	92,282	Mahoning	17.7%
Butler	46,685	Summit	17.2%
Mahoning	39,891	Allen	14.9%
Stark	38,895	Butler	12.0%
Lorain	35,892	Erie	11.8%
Trumbull	21,133	Fairfield	11.7%
Fairfield	19,075	Clark	11.6%

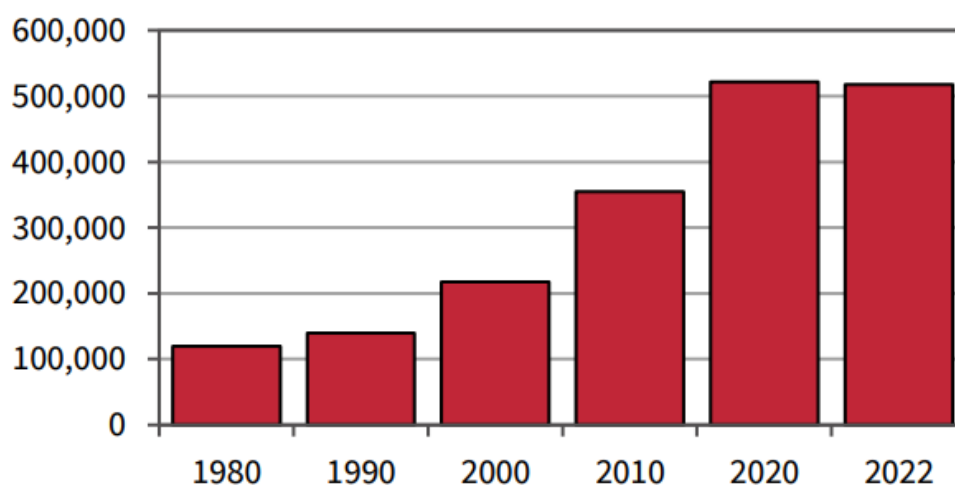
Source: 2022 American Community Survey

There are approximately 104,000 foreign-born African Americans living in Ohio. This constitutes 18 percent of all foreign-born residents, but the number is growing. Most foreign-born African Americans

emigrated from Africa. Approximately one-third of the African migration came from eastern Africa with a majority of the remainder coming from western Africa. Of foreign-born African Americans, sixty-nine percent report speaking only English or English “very well”.

In the United States, the Hispanic population is nearly 63.6 million, or 19.1 percent of the nation’s total population. Since 2000, the number of Hispanics within the U.S. has increased by 28.2 million, or 80 percent. Ohio’s Hispanic community is comprised of more than 517,000 people, accounting for 4.4 percent of the state’s total population. In 1980 there were less than 120,000 Hispanics in Ohio, making up 1.1 percent of the state’s total population. According to American Community Survey data, Ohio’s Hispanic population has more than doubled since 2000.

**Figure 2: Hispanic Population in Ohio**



Source: 2022 American Community Survey

The majority of Hispanic Ohioans live in urban areas of the state. Twenty-nine percent of Hispanic Ohioans live in one of four cities: Cleveland, Columbus, Lorain and Toledo. In Columbus there are 63,400 Hispanic residents, in Cleveland there are 45,800, in Toledo there are 23,900 and in Lorain, 18,100. The Hispanic population makes up a higher proportion of county populations in the north and northwest sections of Ohio, many of which are rural. In Ohio’s Appalachian region, Hispanics represent 2.5 percent of the region’s population.

<b>Table 3: 2022 Hispanic Population by County</b>			
<b>Largest Total Hispanic</b>		<b>Largest Percent of County</b>	
<b>Population</b>		<b>Population</b>	
Cuyahoga	84,829	Defiance	11.2%
Franklin	84,586	Lorain	11.0%
Lorain	34,840	Sandusky	11.0%
Lucas	33,962	Fulton	9.4%
Hamilton	33,603	Henry	8.1%
Butler	21,967	Lucas	8.0%
Montgomery	19,800	Huron	7.2%
Mahoning	15,677	Mahoning	6.9%
Summit	14,222	Cuyahoga	6.9%
Lake	11,962	Putnam	6.8%
Stark	9,551	Franklin	6.4%
Warren	8,476	Hancock	6.3%

Source: 2022 American Community Survey

Much of the recent increase in Ohio's Hispanic population has occurred in the Mexican community, and it has more than doubled since 2000. The number of Hispanic Ohioans with an ancestral link to Mexico is 219,000; twenty-two percent of these residents were born in Mexico. Migration from Mexico is an important factor in the growth in Ohio's Hispanic community with nearly 19,000 people arriving from Mexico since 2010.

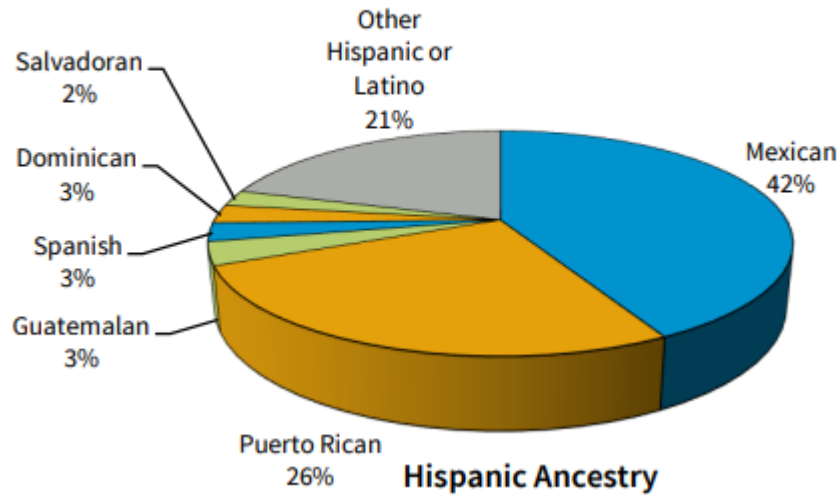
While the number of Ohio residents with Puerto Rican heritage has grown in recent decades, its portion of the Hispanic community has held steady at around 26 percent of Ohio's Hispanic population.

Though Ohio residents with Mexican and Puerto Rican heritage make up a majority of Ohio's Hispanic community, Central and South America are becoming more common points of origin. Hispanic Ohioans with ancestors in Central America have grown to nearly 26,000, with a large portion having ties to Guatemala or El Salvador. From South America, more than 6,000 have migrated from Venezuela.

One-fifth, or nearly 105,000, of Hispanic Ohioans are foreign born; approximately 47,000 of these residents have arrived since 2010. Since coming to the United States, thirty-three percent of foreign-born Hispanics have become naturalized citizens.

Half of Hispanics speak only English at home. Seventy-nine percent of Hispanics speak only English or report speaking English "very well". Nine out of ten foreign-born Hispanics speak Spanish at home.

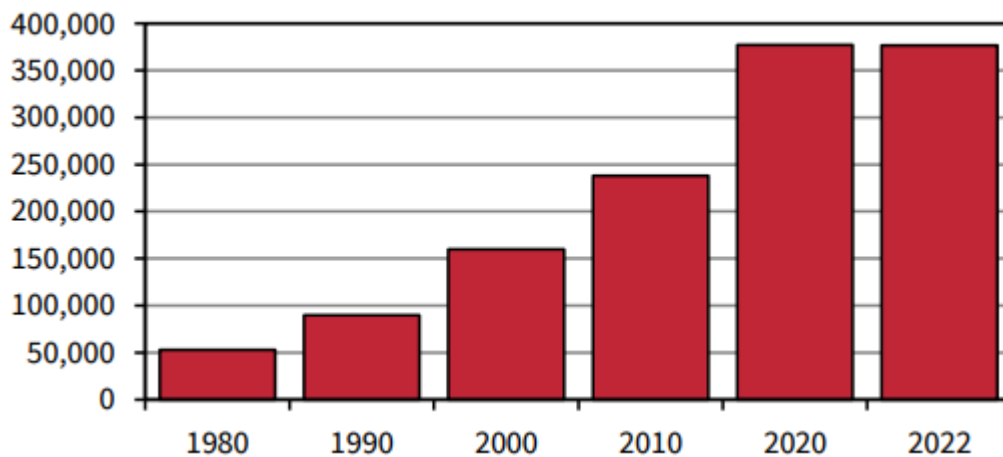
**Figure 3: Hispanic Ancestry in Ohio**



Source: 2022 American Community Survey

The Asian population is more than 24.2 million, or 7.3 percent of the nation's total population. Since 2000, the number of Asian Americans in the U.S. has more than doubled, increasing by 12 million people. Ohio's Asian American community is comprised of almost 377,000 people that claim at least partial Asian heritage, accounting for 3.2 percent of the state's total population. In 1980 there were approximately 50,000 Asians in Ohio, comprising 0.5 percent of the state's total population. Ohio's Asian population has more than doubled since 2000 and is seven times the 1980 count.

**Figure 4: Asian Population in Ohio**



Source: 2022 American Community Survey

Most Asian American Ohioans live in the state's metropolitan areas. Generally, Asian Americans in Ohio are as likely to live in the suburbs than the central city. The city of Columbus is an exception with

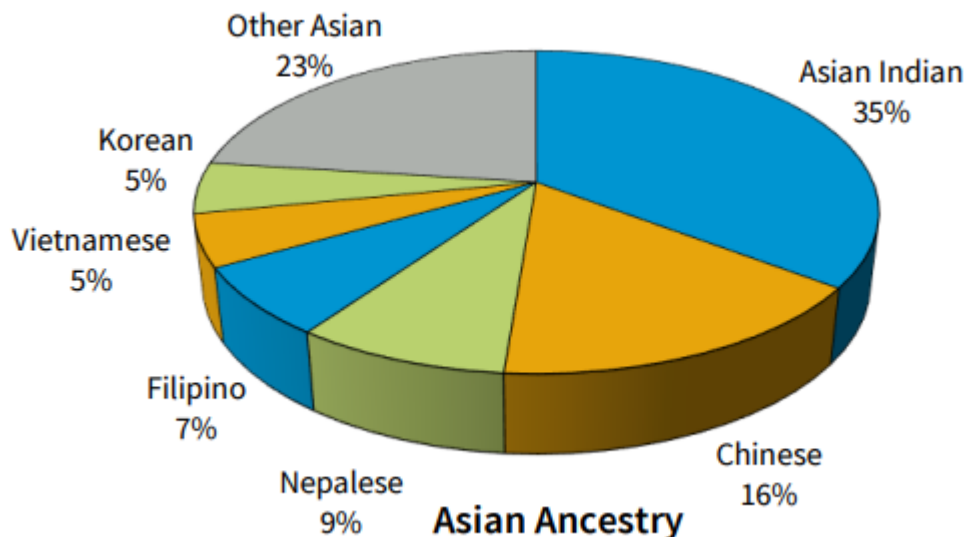
more Asian Americans living in the city because of the influence of The Ohio State University. More than 66,000, or 18 percent, of Ohio’s Asian population live in Columbus. There are another 61,000 Asian American Ohioans living in the Columbus metropolitan area. The Cleveland-Akron metropolitan area has 98,000 Asian American residents. In Ohio’s Appalachian region, Asians represent .6 percent of the region’s population.

<b>Table 4: 2022 Asian Population by County</b>			
<b>Largest Total Asian</b>		<b>Largest Percent of County</b>	
<b>Population</b>		<b>Population</b>	
Franklin	91,376	Delaware	9.9%
Cuyahoga	51,979	Warren	8.2%
Hamilton	30,086	Franklin	6.9%
Summit	27,569	Union	6.6%
Delaware	22,347	Butler	5.4%
Butler	20,790	Summit	5.1%
Warren	20,441	Licking	4.4%
Montgomery	17,552	Greene	4.2%
Lucas	10,479	Cuyahoga	4.2%
Licking	7,954	Hamilton	3.6%
Greene	7,125	Athens	3.5%
Lorain	6,367	Fairfield	3.5%

Source: 2022 American Community Survey

Over 41 percent of Ohio’s foreign-born population is from Asia. More than 104,000 of the nearly 377,000 Asian Americans in Ohio are of Indian descent. The Indian community is growing quickly and has expanded by 60 percent since 2010. Roughly half of foreign-born Indians emigrated from India since 2010. Chinese American, the second largest group behind Indian, accounts for 16 percent of Asians in Ohio. The Chinese community is growing quickly, increasing by approximately 30,000 people since 2000. Around two-thirds of this growth is due to international migration. The Ohio Nepalese community, while smaller, is experiencing significant growth. Since 2010 it has grown from nearly 1,000 to approximately 25,000 people. The size of the Vietnamese community has seen some significant growth over the past two decades growing by half to approximately 15,000 people. The Filipino population is growing but at a slightly slower pace. Roughly 75 percent of Asian American Ohioans speak a language other than English at home. How proficient they are at English depends, to some extent, on their or their family’s country of origin. About 90 percent of the foreign-born Asian population in Ohio with ties to south central Asia, mainly India, speaks a language other than English at home. Of these, around two-thirds report speaking English “very well”. About 60 percent of Asian Americans that speak Chinese, Korean, or Japanese at home report speaking English “very well.” One-quarter from these three groups reports speaking English at home.

**Figure 5: Asian Ancestry in Ohio**



Source: 2022 American Community Survey

### *Household Characteristics*

Familial status and disability are protected classes in federal fair housing laws. In Ohio, the average household size is 2.39 individuals, a decline from 2.44 in 2010. This was a slight leveling off from the steep decline that occurred from 1960 through 2000. Of all households in the state, 31 percent consist of one individual living alone.

Nationally, 28.8 percent of families have children. Twenty-seven percent of Ohio's households consist of families with children. Married-couple families with children living at home comprise 26.7 percent of all families. There are nearly 3 million families in Ohio, of which 41.5 percent have children living at home younger than age 18. Of all married couple families:

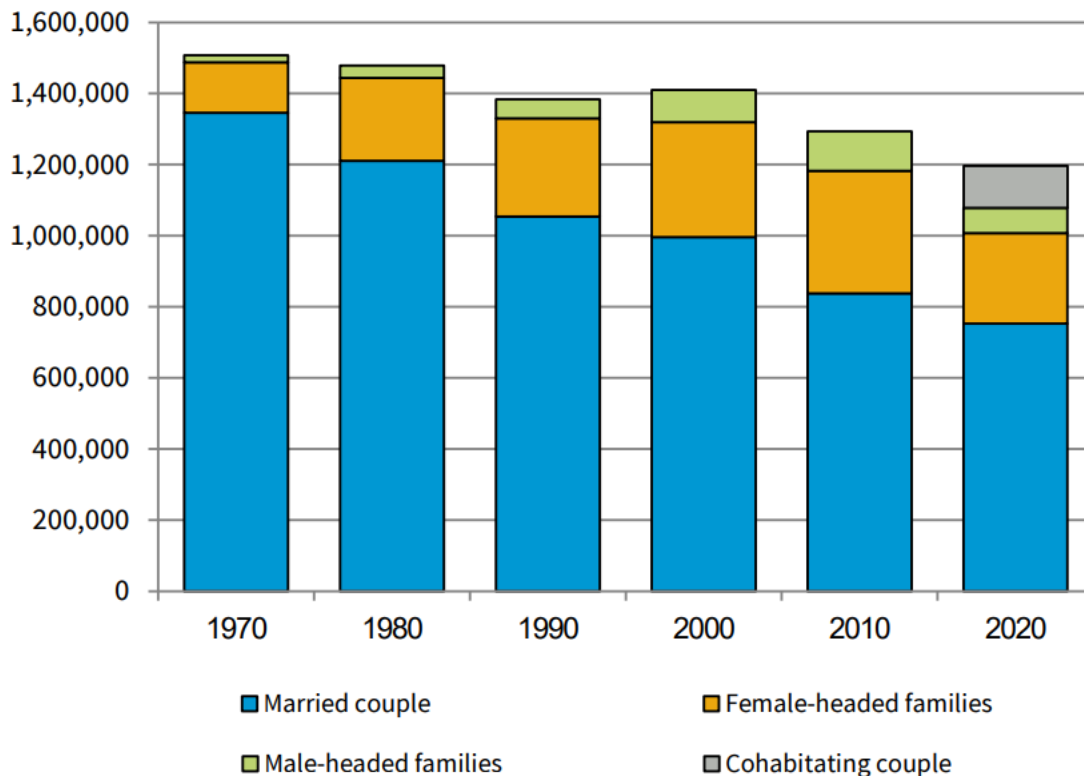
- 124,000 marriages include at least one African American spouse
  - 41 percent with children living at home
- More than 64,300 marriages include at least one Hispanic spouse
  - 53 percent with children living at home
- Greater than 62,300 marriages include at least one Asian American spouse
  - 64 percent with children living at home

Single-female and single-male households without a spouse that have children younger than 18 years living at home represent 10.8 and 3.9 percent of families, respectively.



**Figure 6: Families with Children Under 18 in Ohio**

Families With Children Under 18: 1970 through 2020



Source: 2020 decennial census produced by the U.S. Census Bureau

Under both federal and state law, disability is a protected class. According to ACS data, 14.7 percent, 1.7 million individuals, identify as having some form of disability in the state. For Ohioans ages 16 to 64, cognitive and ambulatory disabilities were the largest categories, approximately 29% and 24% respectively, and self-care disabilities were the smallest at 7.5 percent of individuals. In the 2018 to 2022 period, one in five adults (21%) in Ohio's Appalachian region were disabled, a significantly higher prevalence of disability than for Ohio adults in general. In Ohio's Appalachian region, nine counties have a disability rate of 20 percent or more: Pike (25), Meigs (22.6), Lawrence (23.2), Scioto (23.2), Morgan (21.2), Vinton (23.2), Noble (21.8), Jackson (21.6) and Adams (23)(Map 7). Of Ohioans 65 years and older, 32.4% are disabled, as illustrated in Table 5. Disabled older adults with ambulatory difficulty comprise 20.3 percent of the disabled older adult population. There are more than 441,000 individuals with hearing impairment and more than 283,000 with a vision difficulty living in Ohio.

For people with severe and persistent mental illness or substance use disorders, people with developmental disabilities, and older adults with cognitive and physical health limitations, access to stable, affordable housing is one of the main factors that allows these populations to remain living in the community, avoiding long-term institutional care.

<b>Table 5: Age and Disability in Ohio</b>		
<b>Total Population with a Disability</b>	1,706,964	14.7%
<b>Under 5 Years Old</b>	4,541	0.7%
<i>hearing difficulty</i>	2,625	0.4%
<i>vision difficulty</i>	2,491	0.4%
<b>5-17 years old</b>	142,770	7.5%
<i>hearing difficulty</i>	11,974	0.6%
<i>vision difficulty</i>	16,181	0.8%
<b>18-64 years old</b>	865,777	12.5%
<i>hearing difficulty</i>	156,224	2.3%
<i>vision difficulty</i>	146,011	2.1%
<i>cognitive difficulty</i>	434,348	6.3%
<i>ambulatory difficulty</i>	342,563	5.0%
<i>self-care difficulty</i>	126,656	1.8%
<i>independent living difficulty</i>	309,361	4.5%
<b>65 years and older</b>	693,876	32.4%
<i>hearing difficulty</i>	270,595	12.6%
<i>vision difficulty</i>	119,040	5.6%
<i>cognitive difficulty</i>	161,699	7.6%
<i>ambulatory difficulty</i>	435,571	20.3%
<i>self-care difficulty</i>	135,793	6.3%
<i>independent living difficulty</i>	265,174	12.4%

Source: 2023 1-Year American Community Survey for Ohio  
U.S. Bureau of Census

## *Income, Poverty and Employment*

### *Income*

The 2022 per capita personal income for Ohio was \$57,777 according to the U.S. Bureau of Economic Analysis. Since 1969, per capita personal income has had annual increases as high as 10.7 percent which occurred during the 1970's and as low as -3.0 percent in 2009.

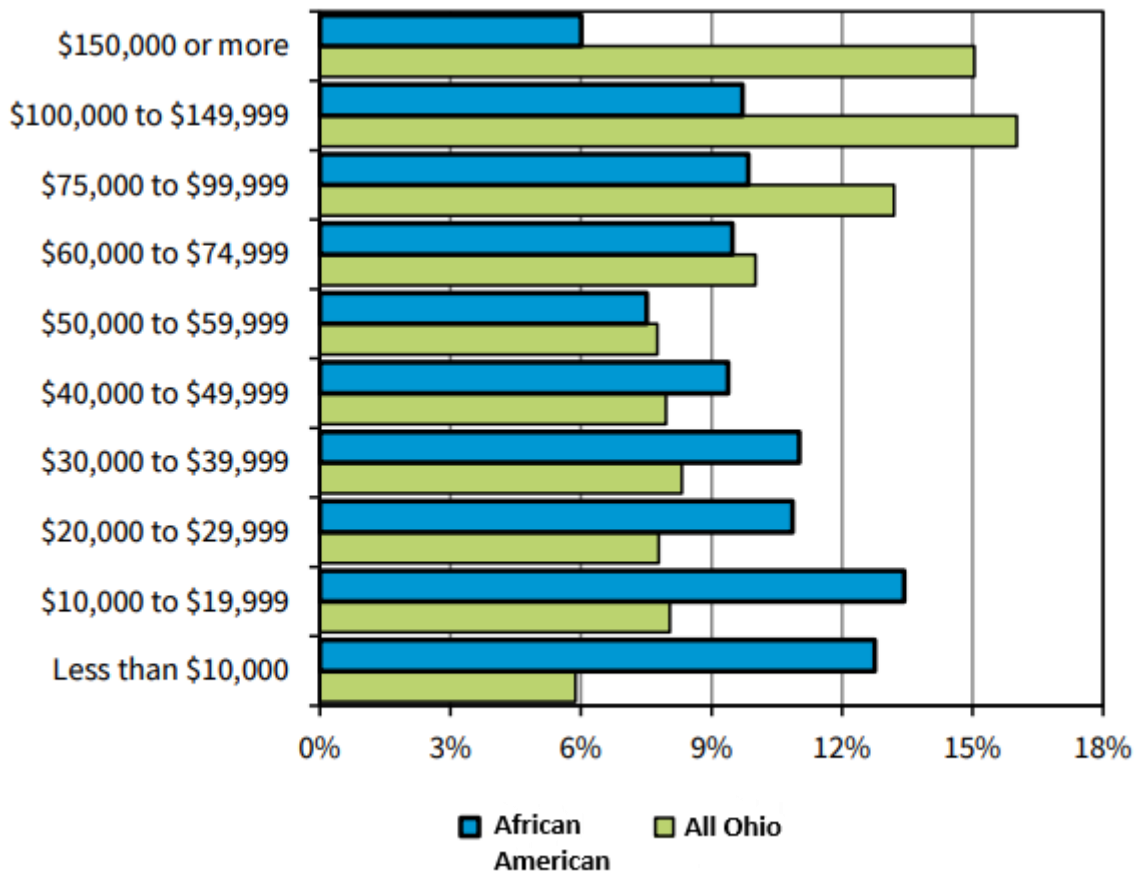
**Figure 7: Per Capita Personal Income; Selected Years**

	1970	1980	1990	2000	2010	2018	2019	2020	2021	2022
<b>U.S.</b>	\$4,198	\$10,180	\$19,621	\$30,657	\$40,546	\$53,309	\$55,547	\$59,153	\$64,430	\$65,470
<b>Ohio</b>	\$4,137	\$9,924	\$18,683	\$28,684	\$36,663	\$47,822	\$49,404	\$52,879	\$57,026	\$57,777

Source: U.S. Bureau of Economic Analysis (BEA)

The income of African American Ohioans tends to be lower than that of Ohioans as a whole, with the median household income at approximately \$42,100. A lack of full-time, year-round employment is one factor accounting for the lower income.

**Figure 8: African American Household Income Distribution in Ohio**

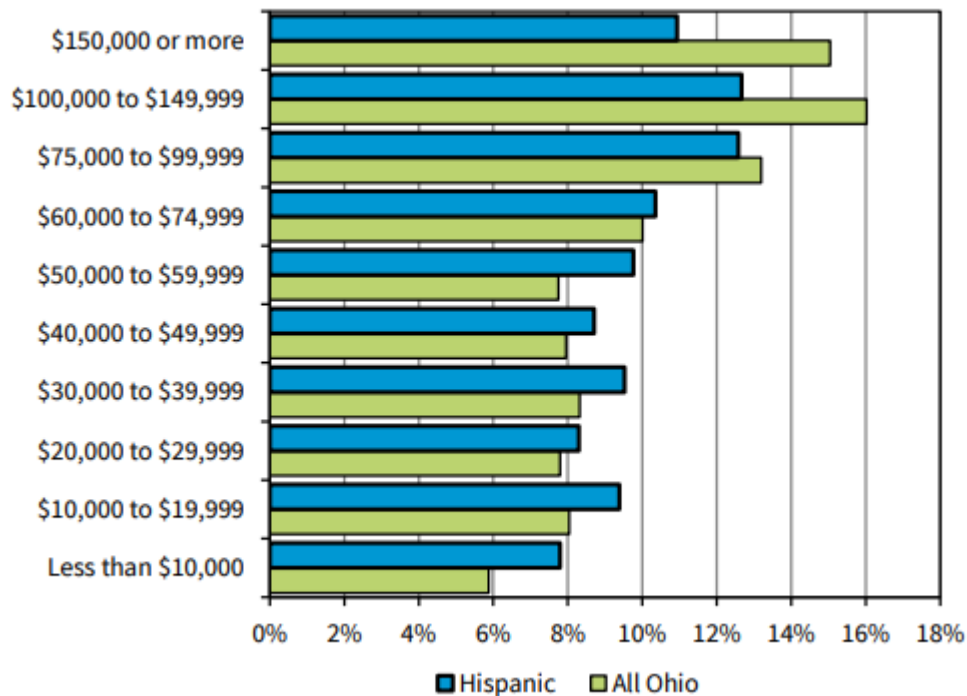


Source: 2022 American Community Survey

The median income of Hispanic Ohioans is more than \$10,000 lower than that of all Ohioans. The median household income for Hispanics is slightly more than \$55,600. Income for Hispanic immigrant

households is \$4,600 more than all Hispanic households. Immigrant households from Mexico have a median income of \$70,100, with the median household income for immigrants from other Central American countries significantly lower at \$51,800.

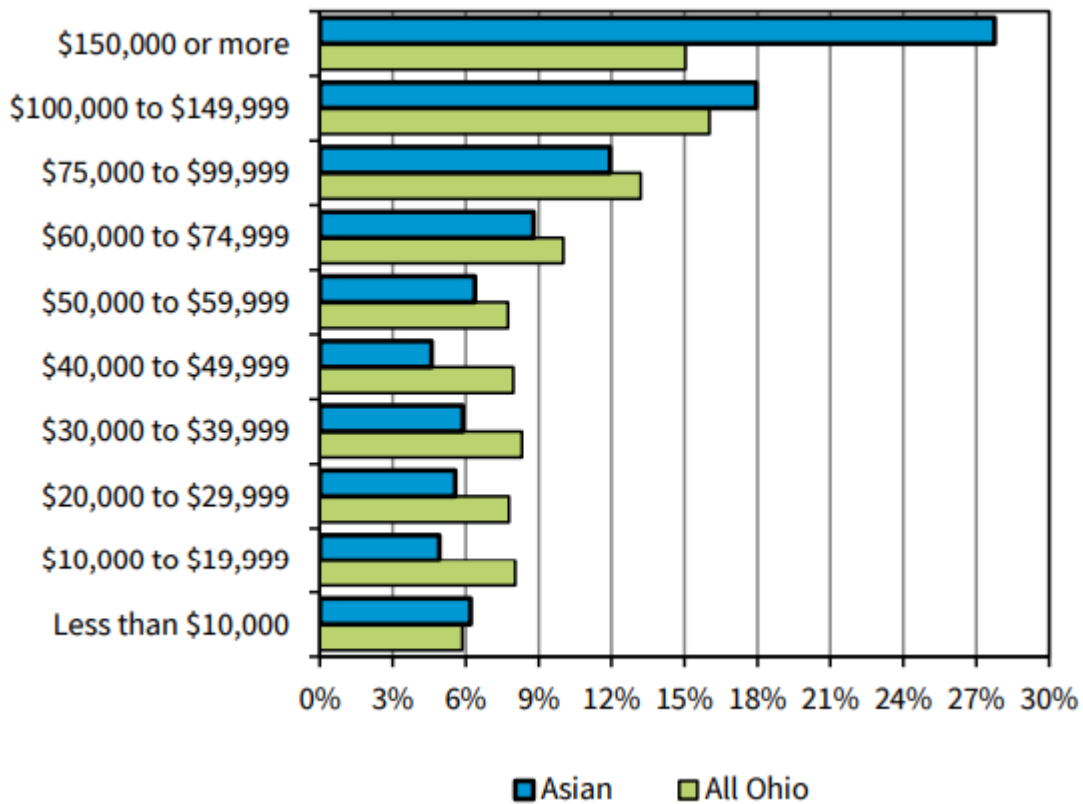
**Figure 9: Hispanic Household Income Distribution in Ohio**



Source: 2022 American Community Survey

The income of Asian Americans in the state tends to be higher than that of Ohioans as a whole. The median household income for Asian Americans living in Ohio is more than \$90,400. The income of foreign-born persons from Asia was slightly lower than that of Ohio's Asian population.

**Figure 10: Asian Household Income Distribution in Ohio**



Source: 2022 American Community Survey

### Poverty

Since 2005, Ohio's poverty rates have been nearly equal to or slightly higher than national averages except for the 2008-2010 period when Ohio's family poverty rate appeared slightly greater than the national rate. The latest data shows that an estimated 1.52 million people in Ohio were poor, 13.2 percent of all persons for whom poverty status was determined. An estimated 274,000, or 9.2 percent, of Ohio families were poor in the latest American Community Survey data (Appendix 4).

In Ohio, 15.8 percent of the people in urban places (densely populated areas of 2,500 or more) were poor, and 25.7 percent of those living in the central or principal cities of metropolitan areas were poor. By contrast, 10 percent of those in rural areas (farms and smaller places) were poor, while 10.1 percent of metropolitan area residents outside of the principal and central cities were poor. In Ohio's Appalachian region, 17 percent of the population was poor; the poverty rate for the rest of Ohio averaged 14.0 percent (Appendix 5).

The counties with the lowest poverty rates were Delaware, Warren, Medina and Geauga, ranging from 4.6 to 6.4 percent. All four counties are suburban metropolitan area counties. The counties with the highest poverty rates were all in Appalachia: Athens, Gallia, Scioto, Adams and Meigs and ranged from 30.6 to 22.4 percent (Map 8)

Poverty rates for families and individuals in Ohio during 2017-2018 vary by circumstances and characteristics. Married couples with a full-time, year-round worker had poverty rates 4 percent or less (under 2.0 if the other worked) compared with poverty rates of 7 percent or more among couples lacking a full-time, year-round worker. Other families with full-time, year-round employment had poverty rates between 4 and 12 percent, while those without a full-time, year-round worker had poverty rates greater than 27 percent.

Families with related children had poverty rates ranging from 5.2 percent among married couples to 40.1 percent for those headed by a female single parent. The corresponding poverty rates for families without children ranged from 2.9 percent to 9.4 percent. This is the same as male single-parent families. 22.9 percent of poor families received cash public assistance, compared with just 5.8 percent of those not in poverty; however, such payments seldom boost families out of poverty. Adults with at least a bachelor's degree account for 3.9 percent of Ohio's poor population, while 28.4 percent of those who did not graduate from high school were poor. High school graduates and those with some college or an associate's degree had poverty rates between 13.5 and 10.4 percent.

By age, children birth to age 11 and young adults 18 to 24 had poverty rates that exceeded 20 percent. Conversely, about 8.5 percent of people aged 65 and older were poor, but between 43 and 62 percent of that population would have been poor without Social Security and pension incomes.

Minorities tend to have higher rates of poverty compared to whites. 26 percent of African Americans in Ohio live below the poverty line. Of Ohio's 315,400 African American family households, 22 percent live below the poverty line. Around 40 percent of these households have children younger than five years of age. 29 percent of African American households received food stamps within the last 12 months. 22 percent of Hispanic Ohioans live below the poverty line. Of Ohio's 104,900 Hispanic family households, 19 percent live in poverty, of which 43 percent have children younger than 5 years of age. 20 of Hispanic households received food stamps within the last 12 months. Of Ohio's Asian American population, 12 percent live below the poverty line. Of Ohio's nearly 73,000 Asian American family households, 9 percent are in poverty, and around two-thirds have related children at home. Approximately 10 percent of Asian Americans households received food stamps within the last 12 months.

### *Employment*

Ohio's manufacturing sector employs 683,148 people. The state's factories lead the nation in plastics and rubber, fabricated metals, electrical equipment and appliance production and transportation equipment. Ohio also is a leading producer of steel, autos, and trucks. Skilled manufacturing workforce, healthcare hubs, relatively low business costs, and increasing diversification in the metropolitan regions are areas of economic strength.

Table 6 lists the state's major employers. A full list can be found in Appendix 6.

<b>Table 6: Major Employers in Ohio</b>		
<b>Company</b>	<b>Employment Estimate</b>	<b>Sector</b>
Cleveland Clinic Foundation	58,433	Health
Wal-Mart Stores, Inc.	56,108	Retail: General Merchandise
Amazon.com, Inc.	45,000	Retail: General Merchandise
The Kroger Company	42,926	Retail: Food Stores
The Ohio State University	37,863	Education and Health
OhioHealth	35,000	Health
Wright-Patterson Air Force Base	33,807	Government: Air Force base
Bon Secours Mercy Health, Inc.	28,285	Health
JPMorgan Chase & Co.	20,228	Finance: Bank
ProMedica Health System	18,712	Health
Cincinnati Children's Hospital Medical Center	18,227	Health
Giant Eagle, Inc.	17,400	Retail: Food Stores
Honda	15,600	Manufacture: Motor Vehicles
University of Cincinnati	15,326	Education

Source: Ohio Department of Development

There are approximately 98,500 African American-owned businesses in Ohio. Of that number, there are more than 3,700 businesses with a payroll and, combined, employ more than 52,300 workers with an annual payroll of \$1.8 billion. Hispanic Americans own approximately 23,000 businesses in Ohio, of which there are 2,500 Hispanic businesses with a payroll and, combined, employ nearly 33,000 workers with an annual payroll of nearly \$1.2 billion. Asian Americans own approximately 25,500 businesses in Ohio. Of that number, businesses with a payroll total of 9,500 and, combined, employ nearly 92,000 workers with an annual payroll of \$3.3 billion.

Ohio's civilian labor force totaled more than 5.7 million in 2023, with more than 5.5 million individuals employed. The national unemployment rate for December 2023 was 3.7 percent. Ohio's unemployment rate was 3.6 percent in December 2023 compared to 3.9 percent a year earlier (Map 9).

The number of African American Ohioans in the civilian labor force is nearly 685,000; the unemployment rate for African American Ohioans is 8.5 percent. African Americans in the labor force between the ages of 20 and 24 have an unemployment rate of 15.9 percent. For Ohio the same age group has a 6.8 percent unemployment rate. Employed African Americans are heavily represented in service occupations. Of the nearly 627,000 employed African Americans in Ohio, 23 percent are in service occupations with 47,000 in healthcare support. By comparison, 16 percent of all Ohioans are in service occupations. Production/ transportation/ material moving occupations account for 23 percent with 61,000 African American Ohioans involved in material moving occupations alone.

The number of Hispanic Ohioans in the civilian labor force is 244,000. Hispanic Ohioans have an unemployment rate of 5.0 percent. Hispanics make up 4.1 percent of Ohio's civilian labor force.

Employed Hispanics are heavily represented proportionally in the service occupations, especially in food preparation and serving occupations, compared to the state. Of the 232,000 employed, nearly 23,300, or 10 percent, are in food preparation occupations. For all Ohio workers, only 5.5 percent are in food occupations. Production occupations and construction occupations also have higher concentrations of Hispanic workers compared to the whole workforce.

Based on 2022 ACS data, the number of Asian American Ohioans in the civilian labor force is 158,900 and accounts for 2.6 percent of the civilian labor force. Asian Americans in Ohio have an unemployment rate of 3.0 percent; Ohioans have an unemployment rate of 3.6 percent. Employed Asian Americans are highly represented in professional occupations, compared to Ohioans as a whole. Of the roughly 154,100 employed Asian Americans, nearly 48 percent are in occupations of computer/engineering/science (21 percent), management (16 percent), and healthcare (12 percent). There is also a significant number in educational occupations.

### *Housing in Ohio*

Ohio has more than 5.2 million total housing units, with an 8.8 percent vacancy rate. In the Appalachian region, the vacancy rate is 11.7 percent. More than 3.2 million individuals, 66.8 percent, in the state own their own home and more than 1.5 million, 33.2 percent, rent housing. 72 percent of the population owns their own home in Ohio's Appalachian region, while 28 percent rent housing.

According to ACS data, the median year homes were built in the nation was 1980. The median year housing units were built in Ohio and in the Appalachian region is 1970, 10 years before the national median year. Most of Ohio's homes, roughly 64 percent, were built by 1979 (Table 7). Due to age, maintaining older housing can cause financial strain on the homeowner. Homes built after 1979 comprise 35.4 percent of the state's housing stock.

<b>Table 7: Age of Housing Stock in Ohio</b>		
<b>Year Built</b>	<b>Estimate</b>	<b>Percentage</b>
2020 or later	17,474	0.3%
2010-2019	256,572	4.9%
2000-2009	497,945	9.5%
1990-1999	607,740	11.6%
1980-1989	478,029	9.1%
1970-1979	740,710	14.1%
1960-1969	619,978	11.8%
1950-1959	713,002	13.6%
1940-1949	303,916	5.8%
1939 or earlier	1,015,843	19.3%

Source: 2022 American Community Survey



The median gross rent per month in Ohio is \$945 and \$735 in the Appalachian region. Table 8 illustrates the median gross rent for housing units in the state. Renters in the state on average allocate 27.7 percent of their household income to housing.

<b>Table 8: Gross Rent in Ohio</b>		
<i>Amount</i>	<i>Number</i>	<i>Percent</i>
Less than \$100	9,830	0.6%
\$100 to \$199	9,709	0.6%
\$200 to \$299	48,233	3.0%
\$300 to \$399	37,061	2.3%
\$400 to \$499	42,444	2.7%
\$500 to \$599	74,875	4.7%
\$600 to \$699	123,841	7.8%
\$700 to \$799	159,259	10.0%
\$800 to \$899	172,058	10.8%
\$900 to \$999	167,722	10.6%
\$1,000 to \$1,499	475,215	29.9%
\$1,500 or more	184,537	11.6%
No cash rent	84,320	5.3%

Source: 2022 American Community Survey

The National Low Income Housing Coalition's (NLIHC) *Out of Reach 2024* report states that a household would need an annual income of \$43,293 to afford a two-bedroom unit at Ohio's average fair market rent (FMR) of \$1082. For non-metropolitan areas, FMR for a two-bedroom unit averages \$887. An individual making minimum wage would have to work 80 hours per week to rent a two-bedroom unit at FMR.

Out of Ohio's 88 counties, 40 have FMR that exceeds \$887 a month for a two-bedroom unit, with 17 exceeding \$1082 per month. Below are the 48 counties with an average FMR of \$887 or lower per month for a two-bedroom unit.

Adams	Clinton	Fayette	Highland	Logan	Muskingum	Putnam	Trumbull
Ashland	Columbiana	Gallia	Hocking	Mahoning	Noble	Richland	Van Wert
Ashtabula	Coshocton	Guernsey	Holmes	Meigs	Paulding	Sandusky	Vinton
Auglaize	Crawford	Hardin	Huron	Mercer	Perry	Scioto	Washington
Brown	Darke	Harrison	Jackson	Monroe	Pike	Seneca	Williams
Champaign	Defiance	Henry	Jefferson	Morgan	Preble	Shelby	Wyandot

The median home value in Ohio is \$183,300. The median monthly homeowners' cost in the state is \$1,429. The monthly cost calculation includes mortgage, real estate taxes, various insurances, utilities, fuels, mobile home costs, and condominium fees. On average, owners' costs comprise 18.6 percent of a household's monthly income.

Property taxes can also deter individuals from owning a home or preventing foreclosure. The Ohio Department of Taxation's homestead exemption allows low-income older adults and permanently and totally disabled individuals to reduce their tax bills by shielding some of the market value of their homes from taxation. The exemption allows qualifying homeowners to exempt up to \$25,000 of the market value (\$8,750 in taxable value) of their homes from all local property taxes in the form of a credit on property tax bills. Veterans who have received a 100 percent permanent total disability rating or a total disability rating for a service-connected disability or combination of service-connected disabilities are exempt from this income threshold and are eligible to receive a homestead credit value of \$50,000. Any Ohio resident homeowner may qualify for the exemption if they meet the following criteria:

- Not currently receiving homestead or did not qualify in the previous tax year;
- Qualifies under the means-test;
- Is at least 65 years of age or turns 65 in the year applying for the exemption;
- Is determined permanently and totally disabled as of January 1 of the application year by a licensed physician or psychologist or a state or federal agency; or
- Is the surviving spouse of a person who received the previous homestead exemption at the time of death and the surviving spouse was at least 59 years old on the date of the death.

## Section 2: Federal and State Fair Housing Laws

### *Ohio Civil Rights and Fair Housing History<sup>1</sup>*

Early in Ohio's history, settlements in southern Ohio by people from slave states progressed faster than northern Ohio by settlers from eastern states. As a result, this set the initial tone for civil rights toward the largest minority group of the time: free Africans and escaped and free slaves. Most freed and escaped slaves settled in Ohio River and southern counties where attitudes toward these groups were not of equality. During this time, the Ohio legislature passed a series of "Black Laws" that imposed constraints on free African Americans to discourage them from settling in the state. Enacted in 1804 and 1807, these laws treated African Americans as second-class citizens. More stringent restrictions were enacted in the 1830s; however, most of these restrictions were repealed by 1850.

The Civil War created an intense period of industrialization and population growth. While a significant number of African Americans lived in Cincinnati, Columbus and other towns, most of the industrial labor force was comprised of whites migrating from Ohio's rural areas and immigrants. The post-war period brought with it greater diversity in ethnic and religious groups. Large numbers of Italians, Slovenians, Croatians, Polish, Lithuanians, Slovaks and Jewish and Eastern Orthodox religious followers came to Ohio. Southern and eastern Europeans settled mainly in Cleveland and the Mahoning Valley. Toledo included these groups along with Mesopotamian Chaldeans from Detroit. At this time, few Asians or Hispanics immigrated to Ohio. Although these groups were no more qualified for industrial work than African Americans, employers preferred to recruit immigrants.

European immigrants initially tended to concentrate in certain neighborhoods, particularly those with the least expensive housing, close to commerce or in areas where they could organize an ethnic religious parish. In Cincinnati, the Over the Rhine district was a center of German settlement and culture. In Cleveland, many Italian and Jewish immigrants settled in the Central district southeast of the main market. Despite these patterns, it was unusual for one white ethnic group to comprise more than 50 percent of a neighborhood. In Cleveland, African Americans lived in the Central district and in other neighborhoods throughout the city. Prior to World War I, housing patterns were more racially diverse in Ohio than they were following the Great Migration and Ohio's housing industries and communities' response to the Great Migration.

Coinciding with World War I, several factors affected the change in race relations in Ohio. Woodrow Wilson, a southerner, was elected president and effectively stopped race relations at the federal level. The beginning of the war cut off immigrant labor to America at the same time demand for American products increased. Employers were forced to look at domestic labor to fill wartime needs. As a result of boll weevils ravaging southern cotton crops and an oppressive system in the south, many African Americans were receptive to recruiters. Nearly 6 million African Americans from southern states migrated north during the Great Migration from about 1916 to 1970. From 1910 to 1920, Cleveland's African American population quadrupled. By 1930, the population doubled again and comprised 8 percent of the city's population. By 1960, more than 250,000 African Americans lived in Cleveland.

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<sup>1</sup>Ohio State Legal Services Association. *History of Fair Housing in Ohio*. Ohio Development Services Agency, 1999. Web. May 4, 2015.

As more African Americans migrated to Ohio, white citizens and community, social and economic institutions responded to the racial change. Economic, social and governmental institutions' racial policies and practices had more lasting and widespread consequences on civil rights, especially housing rights in Ohio. Institutionalized racial discrimination patterns, enforced by government regulation or professional associations, replaced looser, more sporadic instances of social bias in the state.

In housing, real estate companies encouraged restrictive covenants to restrict certain groups from purchasing property in many areas. Developers of an exclusive suburb in Cleveland specified no African Americans would reside in the suburb, even those professionals who could afford to live there. In another suburb, a neighborhood association developed a restrictive covenant excluding Jews and many southern and eastern European ethnic groups. As more European ethnic groups became "Americanized", the real estate market welcomed their money; however, this did not extend to African Americans. The U.S. Supreme Court ruled restrictive covenants legally unenforceable in 1948. Despite the decision, many sellers and agents continued to follow these practices.

The federal government explicitly supported racial exclusion in its Federal Housing Administration (FHA) and Veterans' Administration (VA) mortgage loan insurance programs initially. The FHA manual mentioned the need to avoid introducing "inharmonious" racial groups into all-white neighborhoods. Public housing projects built during the Great Depression were originally racially segregated by policy, with separate projects for African Americans and whites. After World War II, when the federal government subsidized white migration to the suburbs by providing low-interest home loans and constructing superhighways, African Americans were relegated to older inner-city housing vacated by whites.

With exclusion from most neighborhoods by institutional design or individual hostility and violence, African Americans lived in neighborhoods open to them. As families doubled up or larger homes were divided into substandard efficiency apartments, population densities increased in these neighborhoods. With high demand and limited supply, rents or housing prices in these densely populated areas were higher than in nearby white areas. As a result, some real estate agents engaged in blockbusting for economic reasons. These agents would target white neighborhoods adjacent to predominantly African American ones. Agents would help one African American family move into the neighborhood, then market to neighboring whites offering to buy their properties at less than the home's value. Agents would make a profit twice: selling a new home in a suburb to white homeowners and then selling the vacated home to an African American family at a considerable markup. Lending institutions and insurers typically supported these practices by refusing loans to African Americans except in predominantly African American neighborhoods or in "changing" neighborhoods. Conversely, white buyers were typically directed away from these areas by realty companies and lenders.

Federal efforts in the late 1940s resulted in the Housing Act of 1949 that called for decent and safe housing for all Americans. The act authorized the federal government to award funds to communities to assist in eliminating slum and redeveloping center cities, new construction, and activities that support new construction such as neighborhood facilities, and basic water and sewer facilities. The federal government provided subsidies totaling nearly \$13 billion to communities that were then required to supply matching funds. Local governments obtained sites through eminent domain, the

right of the government to take over privately owned real estate for public purposes, in exchange for "just compensation". They would then sell the cleared land to private real estate developers at below-market prices. In return for the subsidy and certain tax abatements, developers built commercial projects and housing for the upper-middle class. The act also promoted building civic centers, office buildings, and hotels on the cleared land. In many areas, land too close to slum areas became municipal parking lots.

The Highway Act of 1956 funded interstate highways that also helped perpetuate urban sprawl. White middle-class residents moved to new suburban housing developments. The highways also divided cities physically. Clearing inner-city neighborhoods to construct the new highway system destroyed neighborhoods and displaced low-income residents. Nationally, more than 2,000 construction projects on 1,000 square miles of urban land were undertaken between 1949 and 1973, when the urban renewal program officially ended. Roughly 600,000 housing units were demolished, requiring nearly two million inhabitants to move.<sup>2</sup>

During this time, politically, African Americans were represented on city councils and school boards, and a few were members of the Ohio General Assembly and judiciary system. However, there were no African American mayors of medium- to large-sized cities, statewide elected officials or Congress members. While the African American population grew, as a group, they still had limited political representation.

In 1959, the Ohio General Assembly passed legislation prohibiting employment discrimination and established the OCRC. While the law created the Commission to enforce discrimination laws, the Commission did not always have funding. In 1965, the Ohio General Assembly passed legislation that extended discrimination protection to housing, and in 1987, passed Ohio's Fair Housing Law.

In August 1988, Congress amended the federal Fair Housing Law to substantially increase HUD's power to seek relief for individual housing discrimination claims. Other amendments broadened the number of protected classes to include families with children and the disabled. In 1989, the federal government grandfathered Ohio law into substantial equivalency. Ohio's substantially equivalent fair housing law was passed in June 1992.

Although Ohio's legislature passed fair housing laws, voters during the 1970s and 1980s continued to reject amending the Ohio Constitution to permit issuing mortgage revenue bonds for housing. When multi-family housing was removed from the language, voters passed the amendment in 1982. The Ohio Housing Finance Agency (OHFA) was created in 1993. With active participation by fair housing agencies across the state, OHFA adopted fair housing policies.

In 1980, HUD released a study concluding that 25 percent of all rental housing in the nation was not available to families and an additional 50 percent of the rental stock imposed significant restrictions on either the age or number of children in a family. Families with children lacked fair access to 75 percent of the nation's rental housing. As a result, families were evicted from their homes because of their size. Until the federal Fair Housing Amendments Act of 1988 (FHAA) was enacted, both federal and Ohio fair housing laws primarily protected racial and ethnic minorities against housing

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<sup>2</sup>Curtis, Cathy. "Urban Redevelopment." *Dictionary of American History*. Ed. Stanley I. Kutler. 3rd ed. Vol. 8. New York: Charles Scribner's Sons, 2003. 285-288. *Gale Virtual Reference Library*. Web. 4 May 2015.

discrimination. The FHAA was enacted with two purposes: to strengthen the administrative enforcement provisions of Title VIII and extend Title VIII protections to additional individuals by including familial status and disability.

Congress' general intent for the Fair Housing Act and the 1988 amendments was to ensure all Americans have equal access to adequate housing and an equal opportunity to obtain housing they choose. Since relatively few minorities live in rural Ohio, prior fair housing laws did not impact those areas as much. By amending the Fair Housing Act to prohibit familial status and disability discrimination, Congress expanded the fair housing law's scope and made the law more relevant to individuals living in Ohio's rural areas. Both issues in fair housing may be more pervasive in rural areas because of smaller housing supply, greater geographic distances and related mobility barriers, no or limited access to local fair housing agencies or civil rights organizations and a larger proportion of small, private owners in rural housing markets. Many low-income families with children in rural areas live in mobile home parks, which have not been enforced as aggressively as other housing types. Since the Fair Housing Act of 1988 and Ohio's substantially equivalent legislation passed in 1992, housing discrimination charges based on familial status or disability rose considerably.

Ohio, like the nation, has a serious affordable housing shortage, which is exacerbated by housing discrimination against families with children. In 1998, the Coalition on Homelessness and Housing in Ohio (COHHIO) released a study entitled "Out of Reach: Rental Housing at What Cost?" that analyzed the issues renters faced in the private rental market in Ohio. The study found:

- 37 percent of all Ohio renters were unable to afford rent for a two-bedroom unit (30 percent of income for housing costs);
- Low-income renters paid more than one-third of their household income for housing costs in all of Ohio's metropolitan areas;
- In the 39 counties analyzed, low-income renters had to pay more than one-third of their household income for a two-bedroom unit;
- In all of Ohio's metropolitan areas and the 39 counties analyzed, renters earning minimum wage had to work between 60 and 81 hours per week to afford a two-bedroom unit; and
- In rural areas low-income renters could not afford fair market rent for a two-bedroom unit.

The Fair Housing Amendment Act had three broad purposes related to individuals with disabilities:

- To end segregated housing available to individuals with disabilities;
- To expand housing choice for individuals with disabilities; and
- To assure reasonable accommodations are made to the individual needs of people with disabilities in securing and using housing.

The disabled provisions of the FHAA provided broad protections for individuals with disabilities. However, three unique discrimination categories were included for individuals with disabilities:

- Refusing to rent or sell to individuals with disabilities or attempting to evict an individual because of a disability;
- Landlord or housing provider refuses an individual's request for a reasonable accommodation in rules, policies, practices or services to enable an individual to acquire or enjoy a unit; and

- Landlord's or housing provider's failure to make certain units of newly constructed multi-family housing accessible to disabled individuals with mobility impairments.

The OCRC experienced a large increase in the numbers of fair housing and disabled discrimination claims filed in 1999. The Commission refocused its energies, and along with HUD, expanded community education and outreach efforts. The Ohio Department of Development and fair housing organizations in the state increased educational efforts on fair housing and served as clearinghouses for disseminating information to civil rights and housing advocates across Ohio. Many small cities in Ohio have established local fair housing agencies, appointed a local fair housing contact and passed local fair housing ordinances. In several rural counties, local legal aid programs received funding to perform fair housing education and outreach and investigate cases. Professional associations related to housing also conduct national, state and local fair housing trainings for their members.

### *Current Federal Laws and Executive Orders*

#### **Fair Housing Act**

Title VIII of the Civil Rights Act of 1968 (Fair Housing Act), as amended, prohibits discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions, based on race, color, national origin, religion, sex, familial status (including children under the age of 18 living with parents or legal custodians, pregnant women, and people securing custody of children under the age of 18), and disability.

#### **Title VI of the Civil Rights Act of 1964**

Title VI prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving federal financial assistance.

#### **Section 504 of the Rehabilitation Act of 1973**

Section 504 prohibits discrimination based on disability in any program or activity receiving federal financial assistance.

#### **Section 109 of Title I of the Housing and Community Development Act of 1974**

Section 109 prohibits discrimination on the basis of race, color, national origin, sex or religion in programs and activities receiving financial assistance from HUD's Community Development Block Grant Program.

#### **Title II of the Americans with Disabilities Act of 1990 and the Olmstead Decision**

Title II prohibits discrimination based on disability in programs, services, and activities provided or made available by public entities. HUD enforces Title II when it relates to state and local public housing, housing assistance and housing referrals. The Olmstead decision put forth federal requirements on how agencies that receive federal assistance should encourage integrated housing opportunities for those with disabilities to ensure housing choice, reinforcing self-determination.

#### **Architectural Barriers Act of 1968**

The Architectural Barriers Act requires that buildings and facilities designed, constructed, altered, or

leased with certain federal funds after September 1969 must be accessible to and useable by handicapped persons.

### **Age Discrimination Act of 1975**

The Age Discrimination Act prohibits discrimination on the basis of age in programs or activities receiving federal financial assistance.

### **Title IX of the Education Amendments Act of 1972**

Title IX prohibits discrimination on the basis of sex in education programs or activities that receive federal financial assistance.

### **Executive Order 11063 (1962)**

Executive Order 11063 prohibits discrimination in the sale, leasing, rental, or other disposition of properties and facilities owned or operated by the federal government or provided with federal funds.

### **Executive Order 11246 (1965)**

Executive Order 11246, as amended, bars discrimination in federal employment because of race, color, religion, sex, or national origin.

### **Executive Order 12892 (1994)**

Executive Order 12892, as amended, requires federal agencies to affirmatively further fair housing in their programs and activities, and provides that the Secretary of HUD will be responsible for coordinating the effort. The Order also establishes the President's Fair Housing Council, which will be chaired by the Secretary of HUD.

### **Executive Order 12898 (1994)**

Executive Order 12898 requires that each federal agency conduct its program, policies, and activities that substantially affect human health or the environment in a manner that does not exclude persons based on race, color, or national origin.

### **Executive Order 13166 (2000)**

Executive Order 13166 eliminates, to the extent possible, limited English proficiency as a barrier to full and meaningful participation by beneficiaries in all federally assisted and federally conducted programs and activities.

### **Executive Order 13217 (2001)**

Executive Order 13217 requires federal agencies to evaluate their policies and programs to determine if any can be revised or modified to improve the availability of community-based living arrangements for persons with disabilities.

### **Executive Order 13988 (2021)**

Executive Order 13988 requires HUD to administer and fully enforce the Fair Housing Act to prohibit discrimination because of sexual orientation and gender identity.

In addition to federal fair housing laws that apply to all transactions, including lending and insurance, the following federal laws specifically address lending practices:



- *The Equal Credit Opportunities Act* – 15 U.S.C.A. Section 1691 et seq.- prohibits creditors from discriminating against credit applicants on the basis of race, color, religion, national origin, sex, marital status, age, because an applicant receives income from a public assistance program, or because an applicant has in good faith exercised any right under the Consumer Credit Protection Act.
- *The Home Mortgage Disclosure Act* – 12 U.S.C. Section 2901 et seq.
- *The Community Reinvestment Act* – 12 U.S.C. Section 2901 et seq.

## *Current State Laws*

The Ohio Fair Housing Law [O.R.C. 4112.02(H)] gives all persons in the federally protected classes the right to live wherever they can afford to buy a home or rent an apartment. Ohio law also adds two additional protected classes: ancestry and military status (Appendix 8). According to Ohio law, it is unlawful, on the basis of race, color, religion, sex, national origin, ancestry, military status, disability, or familial status to:

- Refuse to rent, sell, finance, or insure housing accommodations or residential property.
- Represent to any person that housing accommodations are not available for inspection, sale, rental, or lease.
- Refuse to lend money for the purchase, construction, repair, rehabilitation, or maintenance of housing accommodations or rental property.
- Discriminate against any person in the purchase, renewal, or terms and conditions of fire, extended coverage, of homeowners or renter's insurance.
- Refuse to consider without prejudice the combined income of both spouses.
- Print, publish, or circulate any statement or advertisement which would indicate a preference or limitation.
- Deny any person membership in any multiple listing services or real estate broker's organization.

## Section 3: Ohio Department of Development Community Development Programs

The State of Ohio, through the Ohio Department of Development (Development), administers Ohio's Community Development Block Grant (CDBG), HOME Investment Partnerships, Emergency Solutions Grant and Housing Opportunities for Persons With AIDS program funds received from HUD for non-entitlement communities. Development distributes these federal funds and state funds, based on both an allocation basis and competitive process, to eligible local governments and nonprofit agencies. These funds help Ohio's communities prepare for growth and job creation by providing funding for community development, infrastructure improvements and economic development. Development administers the following programs:

- Economic Development and Public Infrastructure Program: provide grants to create and retain permanent, private-sector job opportunities, principally for LMI persons, through expanding and retaining business and industry in Ohio communities.
- Community Development Programs
  - *Allocation Program*: improve public facilities, public services, housing, economic development and fair housing
  - *Neighborhood Revitalization*: improve the quality of life, livability and functionality of distressed areas and neighborhoods through public infrastructure projects
  - *Critical Infrastructure*: fund high-priority, single-purpose infrastructure improvements with high community-wide impact and that benefit primarily residential areas.
- Residential Public Infrastructure Grant Program: create a safe and sanitary living environment for Ohio citizens by providing clean and reliable drinking water and proper sanitary waste disposal.
- Community Housing Impact and Preservation Program: a flexible, community-wide approach to preserve and improve the affordable housing stock for low-to-moderate income Ohioans and strengthen neighborhoods through community collaboration.
- Housing Opportunities for People With AIDS: provide eligible nonprofit organizations or units of local government with funds to devise long-term, comprehensive strategies to meet the housing and supportive service needs of persons with AIDS or HIV-related diseases.
- Housing Assistance Grant Program: promote affordable housing opportunities and improve housing conditions for low-income families and individuals.
- Housing Development Assistance Program: preserve at-risk affordable housing, create new affordable rental housing, and develop affordable homeownership opportunities.

- Homeless Crisis Response Program: prevent individuals and families from entering homelessness, provide operations funds for emergency shelter, and rapidly move persons from homelessness to permanent housing as quickly as possible.
- Supportive Housing Program: facilitate moving homeless persons to permanent housing by providing transitional housing and long-term permanent supportive housing to homeless persons with disabilities.
- Ohio Housing Trust Fund Special Projects Grant Program: provides funding for projects and innovative proposals that will principally benefit persons below 50% of the AMI and meet the OHTF rules and requirements.

## Section 4: State of Ohio Fair Housing Requirements and Initiatives

Title I of the Housing and Community Development Act of 1974, as amended, requires each unit of general local government that receives Community Development Block Grant (CDBG) funding from a state to certify that it will affirmatively further fair housing (see also 24 Code of Federal Regulations (CFR) 570.487(b)). To ensure that state-funded non-entitlement jurisdictions take actions that promote fair housing choice at the local level, Development designed a mandatory Standard Fair Housing Program that incorporates training, outreach, technical assistance, and a locally developed Analysis of Impediments (Appendix 9). As a condition of funding, each local government grant recipient must develop and implement a Standard Fair Housing Program. Development provides training and technical assistance throughout the grant cycle and evaluates the implementation of the Standard Fair Housing Program during compliance monitoring.

### *State of Ohio Standard Fair Housing Program*

The Standard Fair Housing Program is a community-based framework of analysis, outreach, training and technical assistance that serves to affirmatively further the purposes of the Fair Housing Act. Through this program, local governments actively promote fair housing by appointing a local contact, analyzing impediments to fair housing choice and providing targeted public education.

#### *Local Fair Housing Contact*

Each local government CDBG grantee is required to identify a local fair housing contact. The local fair housing contact is a local government employee who provides general information, receives and processes fair housing complaints and refers cases to the OCRC. Local governments may also retain a consultant or local agency to assist with complaint processing and implementing the Standard Fair Housing Program. Development maintains and publishes a list of local fair housing contacts and associated consultants and local agencies to promote collaboration. The list is available on the Development Technical Assistance website.

#### *Education*

The Standard Fair Housing Program provides essential education regarding discrimination and fair housing rights. Local governments design an annual training program that includes presentations to residents of areas targeted for federal assistance; special populations affected by federally assisted projects; direct beneficiaries of federal housing assistance; and three additional schools, organizations or civic groups.

#### *Outreach*

To reach a broad community audience, local governments also develop an annual plan to distribute fair housing brochures, pamphlets, posters and other informational materials to 10 area agencies, organizations, or public events.

### *Analysis of Impediments to Fair Housing*

To help target education and outreach efforts, local governments must conduct a comprehensive analysis to identify impediments to fair housing choice within their jurisdiction. The analysis should identify policies, actions, omissions, or decisions that restrict housing choices on the basis of the seven protected classes listed in the Fair Housing Act: race, color, religion, sex, disability, familial status, and national origin. Ohio's Fair Housing Act (Ohio Revised Code 4112) expands the list of protected classes to include ancestry and military status. Local governments use the Analysis of Impediments to Fair Housing to develop strategies to address and overcome discriminatory policies and practices. Each non-entitlement county and its local municipalities are covered by an Analysis of Impediments to Fair Housing.

### *New Horizons Fair Housing Assistance Program*

Ohio encourages non-entitlement jurisdictions to undertake focused actions – beyond the required Standard Fair Housing Program – to promote fair housing choice and eliminate discriminatory housing practices. Development's New Horizons Fair Housing Assistance Program provides discretionary funds to units of local government, or consortia of units of local government, to implement innovative training, outreach, and planning activities that serve to affirmatively further fair housing. New Horizons fair housing strategies are based on locally assessed needs and further the state's fair housing goals. Eligible jurisdictions include direct Community Development Program Allocation cities and counties. Development allocates up to \$50,000 annually to the New Horizons Fair Housing Assistance Program

### *Monitoring for Compliance and Provision of Training & Technical Assistance*

Development monitors all grants funded with federal dollars for compliance with fair housing requirements. Development provides training on the state's Standard Fair Housing Program during program application trainings for both the Community Development and Community Housing Improvement and Preservation Programs. Development staff provides training and technical assistance to address noted issues when fair housing deficiencies are identified. Depending on the frequency and/or severity of the compliance violation, Development is empowered to pursue progressive corrective actions up to and including canceling a grant, recapturing funds, and de-certifying the grantee as an eligible CDBG recipient.

## **Section 5: Fair Housing Complaint Data and the Fair Housing Assistance (FHAP) and Fair Housing Initiatives (FHIP) Programs**

HUD shares its authority to investigate housing discrimination complaints with state and local government agencies that are certified through its Fair Housing Assistance Program (FHAP). FHAP agencies enforce state and local laws that provide rights, resolutions, procedures, and opportunities for judicial review that are substantially equivalent to those provided in the federal Fair Housing Act. In Ohio, the OCRC is a statewide FHAP agency, with regional offices in Akron, Cincinnati, Cleveland, Columbus, Dayton and Toledo. Three additional FHAP organizations serve specific localities: the City of Canton Fair Housing Commission, the Dayton Human Relations Council, and the Shaker Heights Fair Housing Review Board.

This section presents statewide discrimination complaints filed with HUD's Office of Fair Housing and Equal Opportunity (FHEO) and FHAP agencies between July 1, 2023, and June 30, 2024. This section also provides an overview of HUD's Fair Housing Initiatives Program (FHIP), and the currently funded FHIP organizations in Ohio, many of whom serve on Development's Program Advisory Group.

The OCRC compiles information on all complaints related to housing discrimination in Ohio. These include complaints that are investigated by HUD as well as those investigated by FHAP partners. Individuals who believe they experienced discrimination in their search for a home, based on their color, race, national origin, sex, religion, disability, or familial status, have one year to file a complaint with HUD. Information collected on these complaints includes the type of complaint, recommendation and closure reason.

Residents also may register housing discrimination complaints at private fair housing organizations. HUD provides funding to these organizations under the Fair Housing Initiatives Program (FHIP) to conduct intake, investigation, mediation, and litigation of housing discrimination complaints. However, these organizations do not provide full services statewide.

### *Basis of Federal Housing Discrimination Complaints*

An individual filing a complaint indicates the basis for the alleged discrimination. Complaints to HUD indicate one of the seven protected classes—race, color, religion, national origin, sex, disability, and familial status, as described in the Fair Housing Act. In addition, a complaint may indicate the allegation of retaliation. In Ohio, a complainant may also file on the basis of military status or ancestry. An individual complaint can indicate multiple bases.

Between July 1, 2023, and June 30, 2024, 706 complaints were filed in Ohio. At this time, 80 complaints have been closed with one of the following reasons: Probable Cause – Schedule Conciliation, Withdrawal of Charge – With Settlement, or Ratify Conciliation Agreement and Consent Order Prior to Final Determination - Close. The most common type of complaint was for terms and condition discrimination and the second most commonly cited type of complaint was for threatening (Table 9).

<b>Table 9: Types of Complaints filed in Ohio (July 1, 2023 to June 30, 2024)</b>	
<b>Refusal to Rent</b>	222
<b>False Denial</b>	78
<b>Terms and Conditions Discrimination</b>	301
<b>Advertise Discriminatory</b>	68
<b>Threaten</b>	292
<b>Financial Discrimination</b>	106
<b>Blockbusting</b>	34
<b>Steering</b>	46
<b>Denial of Reasonable Modification</b>	158
<b>Denial of Reasonable Accommodation</b>	256
<b>Other</b>	202

Source: Ohio Civil Rights Commission

### *Resolution of Federal Housing Discrimination Complaints*

Complaints can be resolved, or closed, in several ways by HUD and/or FHAP agencies. One means of closure is through conciliation, settlement or other resolution, arranged either privately or through the investigating agency. Probable cause or withdrawal of charge with settlement was found for 8.6% of all closures between July 1, 2023, and June 30, 2024. Cases closed because no reasonable basis was found for the complaint account for 44.7 percent of all complaints. “Administrative” closures (complaint withdrawn by complainant, unable to locate complainant, complainant failure to cooperate, or lack of jurisdiction) account for 25.5 percent of complaints.

### *Fair Housing Initiatives Program*

The Fair Housing Initiatives Program (FHIP) was created under Section 561 of the Housing and Community Development Act of 1987 to help promote equal housing opportunities. Under it, HUD provides funding to public, private, and nonprofit groups to conduct fair housing enforcement and education activities. The role of local programs created under FHIP is to:

- 1) Increase compliance with the Fair Housing Act and substantially equivalent state and local fair housing laws;
- 2) Educate the public and housing industry about their rights and responsibilities under the Fair Housing Act; and
- 3) Establish a network of experienced fair housing enforcement organizations throughout the country.

FHIP has three currently funded initiatives. The initiatives are:

Education and Outreach Initiative (EOI)

EOI offers a comprehensive range of support for fair housing activities, providing funding to State and local government agencies and non-profit organizations for initiatives that educate the public and housing providers about equal opportunity in housing and compliance with fair housing laws.

Private Enforcement Initiative (PEI)

PEI offers a range of assistance to the nationwide network of fair housing groups. This initiative funds non-profit fair housing organizations to carry out testing and enforcement activities to prevent or eliminate discriminatory housing practices.

Fair Housing Organizations Initiative (FHOI)

FHOI provides funding that builds the capacity and effectiveness of non-profit fair housing organizations by providing funds to handle fair housing enforcement and education initiatives more effectively. FHOI also strengthens the fair housing movement nationally by encouraging the creation and growth of organizations that focus on the rights and needs of underserved groups, particularly persons with disabilities.

Seven fair housing organizations in Ohio received FHIP grants between 2020 and 2024 (Table 10; Appendix 15). All seven received both funding for the Private Enforcement Initiative and the Education and Outreach Initiative at some point during this timeframe.

<b>Table 10: Summary of FHIP Grants FY 2020 - 2024</b>		
<b>Organization</b>	<b>City</b>	<b>Initiative</b>
Fair Housing Contact Service	Akron	PEI, EOI
Housing Opportunities Made Equal of Greater Cincinnati, Inc.	Cincinnati	PEI, EOI
Housing Research & Advocacy Center	Cleveland	PEI, EOI
Ohio State Legal Services Association	Columbus	PEI, EOI
Miami Valley Fair Housing Center	Dayton	PEI, EOI
Fair Housing Resource Center	Painesville	PEI, EOI
Fair Housing Opportunities Inc., dba Fair Housing Center	Toledo	PEI, EOI

Source: U.S. Department of Housing and Urban Development

These FHIP organizations provide important services to further fair housing in Ohio. Their direct services to clients serve as a less formal alternative to filing a government complaint. Their programs, designed to prevent or eliminate discriminatory housing practices, include:

- Conducting complaint intake and investigations.
- Mediating and litigating housing discrimination complaints.
- Testing the housing, lending, and insurance markets.
- Adminstrating judicial enforcement of federal, state, and local fair housing laws.
- Providing education and outreach programs to inform the public about fair housing laws.



## Section 6: Partnerships

Development collaborates with local governments, fair housing organizations, state agencies, and other stakeholders at an annual Fair Housing/New Horizons Program Advisory Group (PAG) meeting. In addition, Development works closely with the COHHIO and OHFA to address fair housing issues associated with homelessness and access to affordable housing.

### *Fair Housing/New Horizons Fair Housing Assistance Program Advisory Committee*

As part of the citizen participation process for the Ohio Consolidated Plan, Development convenes a Fair Housing/New Horizons Fair Housing Assistance Program Advisory Group each year. The group meeting is open to the public and Development draws committee members from fair housing organizations, the OCRC, COHHIO, OHFA, entitlement and non-entitlement local governments, advocacy organizations, and state agencies. Table 11 lists organizations that served on the Fair Housing/New Horizons committee between 2020 to 2024. Two of Ohio's seven recently funded FHIP organizations - Housing Research & Advocacy Center and the Toledo Fair Housing Center (Fair Housing Opportunities, Inc.) – serve on the committee. The annual meeting provides an opportunity for a wide array of stakeholders to engage in productive discussion regarding Development's programs, fair housing requirements, and training efforts. The committee also discusses the state of fair housing in Ohio and offers recommendations on how Development can enhance training and outreach to address specific issues.

<b>Table 11: Fair Housing/New Horizons Fair Housing Assistance Program Advisory Group Participant Organizations PY 2020 to PY 2024</b>	
<b>Participant Organization</b>	<b>Type of Organization</b>
The Ability Center of Greater Toledo	Center for Independent Living
Hocking, Athens, Perry Community Action Agency	Community Action Agency
WSOS Community Action	Community Action Agency
Great Lakes Community Action Partnership	Community Action Agency
Ohio Regional Development Corporation	Development Consultant
CDC of Ohio, Inc.	Development Consultant
Toledo Fair Housing Center	Fair Housing Organization (FHIP)
Housing Research & Advocacy Center	Fair Housing Organization (FHIP)
Gallia County	Local Government
Greene County	Local Government
Guernsey County	Local Government
Mercer County	Local Government
Licking County	Local Government
Clark County	Local Government
City of Fairborn	Local Government
City of Wooster	Local Government
Ashtabula County	Local Government

City of Ashtabula	Local Government
Gallia County	Local Government
City of Cambridge	Local Government
Coalition on Housing and Homelessness in Ohio	Non-profit Organization
Community Shelter Board	Non-profit Organization
Coleman Health Services	Non-profit Organization
Advocates for Basic Legal Equity	Legal Aid
Seneca Regional Planning Commission	Regional Planning Commission
Trumbull County Planning Commission	Regional Planning Commission
LUC Regional Planning Commission	Regional Planning Commission
Marion County Regional Planning Commission	Regional Planning Commission
Maumee Valley Planning Organization	Regional Planning Organization
Buckeye Hills Regional Council	Council of Local Governments
Ohio Department of Development	State Agency
Ohio Housing Finance Agency	State Agency

Source: Ohio Department of Development

### *Coalition on Homelessness and Housing in Ohio (COHHIO)*

COHHIO is involved in a range of housing assistance services in Ohio, including homeless prevention, emergency shelters, transitional housing and permanent affordable housing with linkages to supportive services. COHHIO assists hundreds of housing organizations and homeless service providers in Ohio through public policy advocacy, training and technical assistance, research and public education.

COHHIO is one of Development's key technical assistance partners, completing the *State of Homelessness Report* and overseeing the Ohio Balance of State Continuum of Care program, which carries out planning responsibilities for and represents the 80 rural counties in Ohio. COHHIO also partners with Development to provide specialized training and technical assistance regarding the nuanced intersection of fair housing law and Ohio Landlord-Tenant Law (Ohio Revised Code 5321).

As part of Development's required Standard Fair Housing Program, local government grantees must have a local fair housing contact to receive, process, and address complaints. The local fair housing contact must be able to discern if a complaint is associated with a protected class under the Fair Housing Act, and, if it is, work with the complainant to formally submit the case to the OCRC. Often, however, complaints fall under Ohio Landlord-Tenant Law and have no recourse under the Fair Housing Act. In such cases, local fair housing contacts are often unequipped to provide guidance. COHHIO's toll-free Tenant Rent Information Line addresses this need and provides an invaluable resource for Development grantee local fair housing contacts.

### *Ohio Housing Finance Agency (OHFA)*

OHFA facilitates developing, rehabilitating and financing low- to moderate-income housing. The Agency's programs help first-time homebuyers, renters, older adults, and others find quality affordable housing that meets their needs. Formerly a division of the Ohio Development Services Agency, OHFA became an independent state agency on July 1, 2005, through Amended Substitute House Bill (HB) 431. OHFA funds competitive fixed-rate mortgage loans and provides financing for developing and rehabilitating affordable rental housing through the Housing Tax Credit program, issuing tax-exempt mortgage revenue bonds, and other affordable housing programs.

OHFA helps low- to moderate-income Ohioans purchase homes and provides opportunities through financing quality and affordable rental housing. The Agency offers financial incentives for developers to increase the supply of affordable rental housing. OHFA administers different funding programs, including the Housing Tax Credit program, which for-profit and nonprofit developers can use to develop new or rehabilitate existing affordable rental housing. The Agency helps property managers maintain safe, affordable housing environments through its compliance programs. OHFA monitors more than 1,000 multifamily properties throughout the state. Finally, the Agency provides financing for competitive fixed-rate mortgages by issuing tax-exempt mortgage revenue bonds and partners with real estate professionals and mortgage lenders. As the allocating agency for the federal Low Income Housing Tax Credit (LIHTC) program, OHFA has assisted in the financing of more than 151,000 affordable rental housing units since 1987. Since 1986, the Agency has funded the creation and preservation of affordable rental housing, including more than 108,000 program units in over 1,700 currently active properties.

OHFA is governed by an 11-member board. The board consists of the directors (or designee) of the Ohio Department of Commerce, Ohio Department of Development, and nine public members. The Governor appoints the nine public members for six-year terms to represent various housing sectors and the public. The director of the Ohio Department of Commerce serves as the board chair.

OHFA serves as a critical partner to Development in preserving and developing affordable housing, as well as in affirmatively furthering fair housing, in Ohio. Development partners with OHFA to fund the Housing Development Assistance Program with HOME Investment Partnership funds and funds from the Ohio and National Housing Trust Fund. Through this program, OHFA primarily facilitates developing and preserving affordable housing units, including those serving individuals with mental health issues and developmental disabilities. All projects that are financed with OHFA multifamily funding are required to have Affirmative Fair Housing Marketing Plans.

## Section 7: State of Ohio Identified Impediments & Action Plan

### *Impediments Identified in Non-entitlement Analyses of Impediments to Fair Housing Choice*

The State of Ohio operates on a five-year Consolidated Plan cycle, and Development requires one hundred and one non-entitlement local government grantees to conduct a new Analysis of Impediments to Fair Housing Choice (AI) at the beginning of each cycle as part of their Standard Fair Housing Program. In the intervening years, grantees prepare an update to the AI. Grantees submit the AI documents and the annual updates to Development for review, and the most recent full AI submission coincided with state fiscal year 2024.

The State of Ohio's non-entitlement grantees each indicate locally identified impediments to fair housing choice. Development analyzes this data and determines impediment categories thematically, with the top five impediments impacting all communities constituting impediments for the State of Ohio. Data was received from all communities except Belmont County which was not factored into data analysis. AI documents reveal several commonly identified impediments:

1. *Need for fair housing education:* In many communities, the general public is simply unaware of fair housing laws. A significant proportion of local governments, 74%, indicated that a lack of fair housing awareness is a severe impediment to fair housing. If people do not know their rights, they will not file complaints and impediments cannot be addressed. In addition, housing providers may not be aware of applicable fair housing laws, and they may intentionally or unintentionally create impediments to fair housing choice. Local governments also noted a strong need for fair housing education for government officials and social service agencies. Without sufficient awareness among local leaders, it is more difficult to serve the fair housing needs of residents.
2. *Lack of affordable housing:* The majority of local governments, 70%, indicated that a significant impediment to fair housing in their community is the lack of housing affordability. Housing affordability impacts all populations, but with protected classes often experiencing lower household and individual incomes, they can be particularly impacted. Local governments indicate that affordability is a pressing issue in their communities that is contributed to by a variety of factors. Growing communities struggle to keep pace with demand, while many rural communities' supply is impacted by decay due to population loss.
3. *Lack of or limited public transit options:* The scarcity of public transit options in Ohio's small cities and rural communities presents impediments to housing choice for those with disabilities, older adults, and individuals without personal automobiles. Access to transportation options in many cases may be the sole determination of where a family or individual is able to seek housing, employment, education, and essential services. While most Ohio counties have some form of specialized transportation services, 13 counties lack any form of public transit. Many systems do not have extensive fixed routes, meaning that residents must schedule rides ahead. 35% of communities are impacted by this impediment.

4. *Need for local policies or legislation:* With 29% of communities affected, the need for local policies or legislation is of growing priority to local governments. These governments recognize the need for action to address a variety of community issues and needs related to fair housing. Numerous communities do not have a local fair housing ordinance or resolution. More strategic and effective policies and legislation are needed in order to coordinate local efforts to ensure housing access and affordability regardless of whether an individual is of a protected class, low-income, or might be experiencing other barriers to housing outside of their control such as reliance on housing choice vouchers, a previous eviction, or criminal history.
5. *Lack of housing availability or supply:* 26% of Ohio communities indicate that the lack of housing availability or supply is a significant barrier to fair housing choices in their communities. Where housing is unavailable or supply is limited, the affordability of housing can be negatively impacted as residents might become limited to more expensive options. Additionally, communities note that a lack of availability or supply limits the housing options available to community members. This can be a difficult barrier to overcome for those in protected classes or those such as seniors looking to downsize after retirement or young people seeking starter homes.

<b>Table 12: Survey Analysis of Non-entitlement Analyses of Impediments to Fair Housing Choice in Ohio: 2025</b>	
Impediment	Percent Affected
Need for fair housing education	74%
Lack of affordable housing	70%
Lack of/or limited transit options	35%
Need for local policies or legislation	29%
Lack of housing availability or supply	26%
Need for government services or subsidies	21%
Lack of knowledge or compliance with landlord/tenant law	20%
Need for fair housing enforcement	17%
Lack of public infrastructure	15%
Potentially exclusionary or inhibitive land use controls	12%
Lack of accessible housing	12%
Lack of transitional housing	12%
Lack of affordable and accessible housing for individuals with disabilities	11%
Poor condition of housing stock	10%
Community opposition or negative sentiments	10%
Lack of building codes/code enforcement	9%
Lack of affordable/accessible housing for seniors	9%
Lack of financial literacy or available resources	9%
Lack of economic opportunities	7%
Segregation or discrimination	7%
Lending issues (e.g. predatory lending, discrimination, lack of financial literacy)	6%
Discriminatory advertising practices	4%
Lack of housing for larger families	3%
Source of income barriers to rental housing	3%
Language barriers	2%
Landlord failure to make reasonable accommodations/modifications	2%

Source: Ohio Department of Development

Four of the most commonly identified impediments in non-entitlement grantee analyses – the need for fair housing education, the lack of affordable housing, the need for local policies or legislation, and lack of housing availability or supply – are reflected in the State of Ohio’s identified impediments and addressed by the Ohio Department of Development, Community Services Division, as discussed below. A fifth most cited impediment – the lack of or limited public transit options – is a critical issue that is being addressed by the Ohio Department of Transportation.

## *Impediment: Limited access to public transit in rural areas*

### Tactics:

According to the Ohio Statewide Transit Needs Study of 2015, Ohio rural transit agencies can expect to spend about a combined \$38 million a year to provide service. Although this is a small portion (about 4%) of the overall transit investment, rural services have expanded since the release of the report and now operate in 38 counties versus 35 counties in 2015.

About half of the existing funding for rural agencies comes from the federal government. Many rural areas also raise funds by contracting with human service agencies and other partners. Local funds, passenger fares and state funds are also important resources for the rural agencies.

Rural areas need more service. The analysis found the current need in 2015 for an additional 1 million transit trips. By 2025, as Ohio's rural population continues to grow older and rely more on public transit, the need for service will grow to more than 4 million trips each year.

This estimate did not include the 27 Ohio counties that did not have any existing public transit service. With public transit having been expanded since 2025, it can be expected that estimated needs will increase. These communities are expected to need 3 million trips per year by 2025.

### Noted Benefits of Investing in Rural Transit:

- Ensure all Ohio residents have access to some public transportation. Expanding service to areas that currently do not have public transportation would reach an estimated 1 million individuals.
- Provide access to jobs, job training, health care and basic personal services. Expanding mobility is important statewide, but especially for people living in Ohio's small towns and rural communities and for employers needing a workforce that can get to work. Transportation needs in these areas are expected to increase as their populations grow older and poorer. Investing in services now will ensure the state has infrastructure in place to support individuals, Ohio businesses and health and human service programs.

The Ohio Department of Transportation's recommended long-term strategies identified 2018-2025 to invest in rural transit include:

- Ongoing monitoring and reporting on transit agency performance and efficiency.
- Increased coordination of public transportation, humane service transportation programs and agencies, so that investments work toward a coordinated, streamlined system.
- More regional services to better align transit service delivery with transit needs, so even as Ohio expands transit into new areas, there are fewer transit agencies statewide.
- Investment in public information systems and transit technologies, so that Ohio's transit services are easy to use and understand.
- Appropriate capital investment in transit vehicles and technologies.

The Ohio Department of Transportation is currently working towards completion of a new Transit Needs Study that will help to inform state efforts in transit access into the next decade.

### *State of Ohio Identified Impediments & Action Plan*

#### **Impediment: Lack of affordable housing**

##### Tactics:

The Ohio Department of Development ***will continue*** to offer a variety of affordable housing programs that leverage federal and state funds. Ohio's affordable housing programs have been supported by the following sources of funds since 1993:

- Community Development Block Grant (CDBG) – Federal
- Ohio Housing Trust Fund (OHTF) – State
- Neighborhood Stabilization Program (NSP) – Federal
- National Housing Trust Fund (NHTF) – Federal
- HOME Investment Partnerships Program (HOME) – Federal

Development provides communities and nonprofit organizations with funding to help preserve and expand the affordable single-family housing stock in Ohio, promote affordable housing opportunities and improve housing conditions for low-income families through the Housing Assistance Grant Program and the Community Housing Impact and Preservation (CHIP) Program.

- Housing Assistance Grant Program: This program is available to nonprofit agencies that contract with locally qualified construction companies to complete home repairs and renovations. The program enables homeowners at or below 50 percent of median income to stay in their homes by providing essential home repairs and renovations for handicap accessibility.
- Community Housing Impact and Preservation (CHIP) Program: This program is available to local governments to preserve and improve the affordable housing stock for low-to-moderate income Ohioans and strengthen neighborhoods through community collaboration. CHIP activities include:
  - *Owner and Rental Rehabilitation Assistance* –corrects substandard conditions so that homes are safe, healthy, durable, energy-efficient, and affordable.
  - *Owner and Rental Repair Assistance* – designed to correct one or more specific deficiencies that adversely affect the occupant's health and safety and/or the house's structural integrity.
  - *Homeownership Assistance* – helps families to purchase homes. It may include a subsidy to lower the interest rate for the loan and/or principal amount, providing down payments, and paying reasonable closing costs.
    - *Down Payment Assistance and Rehabilitation* –homeownership assistance combined with rehabilitation assistance on an existing home that does not meet applicable standards.



- *Down Payment Assistance only* – homeownership assistance on a new or existing home that already meets applicable standards.
- *New home construction in partnership with Habitat for Humanity* – homeownership assistance provided for a newly constructed home to a family qualified by a Habitat for Humanity affiliate.
- *Tenant-Based Rental Assistance* – provided to property owners to subsidize an income-eligible tenant’s monthly rent payments. The assistance can also include security and utility deposits.

Development also provides funds to OHFA to support the capacity of multi-family housing development organizations and provide financing for eligible housing developments to expand the decent, safe, affordable housing supply for very low- to moderate income households. Funding is provided through OHFA for the Housing Development Assistance Program (HDAP) and the HOME Community Housing Development Organizations (CHDOs) Set-aside Program.

- Housing Development Assistance Program (HDAP): This program provides grants and loans for the development and preservation of affordable housing. Awarded as soft funding, HDAP resources enable developers and owners of affordable housing to serve households at or below 50 percent of Area Median Income (AMI).
- HOME Community Housing Development Organizations (CHDOs) Set-aside Program: The state of Ohio receives a yearly allocation of HOME funds from the Department of Housing and Urban Development. Fifteen percent (15%) of those funds must be "set-aside" to be awarded to CHDOs to develop housing. OHFA administers this program and distributes the set-aside funds for the state through its Housing Tax Credit (HTC) program in the form of gap financing for HTC developments.

OHFA offers several additional Multifamily Housing Development Programs that facilitate the development of affordable housing, including the Housing Tax Credit Program, Housing Development Loan (HDL) Program, Multi-family Lending Program (MLP), and the Multi-family Bond Program.

- Housing Tax Credit Program: The Low-Income Housing Tax Credit (LIHTC) program is a tax incentive program designed to increase the supply of quality, affordable rental housing by helping developers offset the costs of rental housing developments for individuals with low- to moderate-income. This program has been the largest driver of the production of new affordable housing in the state and nation over the past several years. Since 1987, OHFA has used the HTC program to facilitate the development of over 100,000 affordable rental housing units in Ohio.
- Housing Development Loan (HDL) Program: The Housing Development Loan (HDL) program provides short-term, low-interest loans to developers who have an award of housing credits through either the competitive (9 percent) Low-Income Housing Tax Credit round or the Bond Gap Financing (BGF) round. Funding comes from the Ohio Department of Commerce, Division of Unclaimed Funds.

- Multi-family Lending Program (MLP): The Multi-family Lending Program (MLP) provides long-term, permanent financing for multi-family rental housing developments that serve low- to moderate-income residents.
- Multi-family Bond Program: The multi-family bond program provides lower-cost debt financing for the acquisition, construction and substantial rehabilitation of multi-family housing and single-family housing for low- and moderate-income residents through the issuance of tax-exempt mortgage revenue bonds.

### **Impediment: Need for fair housing education**

#### **Tactics:**

- Development **will continue** to require each local government grant recipient to develop and implement a Standard Fair Housing Program, which includes focused fair housing education and outreach (Appendix 9). Local governments must design an annual training program that includes presentations to residents of areas targeted for federal assistance; special populations affected by federally assisted projects; direct beneficiaries of federal housing assistance; and three additional schools, organizations or civic groups. In addition, to reach a broad community audience, local governments must also develop an annual plan to distribute fair housing brochures, pamphlets, posters and other informational materials to 10 area agencies, organizations, or public events.
- Development **will continue** to operate the New Horizons Fair Housing Assistance Program. Development will renew efforts to encourage the programs use by local government grantees to further housing education. This program provides discretionary funds to units of local government, or consortia of units of local government, to implement innovative training, outreach, and planning activities that serve to affirmatively further fair housing. New Horizons fair housing strategies are based on locally assessed needs and further the state's fair housing goals. Eligible jurisdictions include direct Community Development Program Allocation cities and counties. Development allocates up to \$50,000 annually to the New Horizons Fair Housing Assistance Program.
- Development **will continue** to encourage grantees to develop or strengthen relationships with the OCRC to address discrimination in the community through services the Commission provides. Development will work to assist in facilitating the development of these relationships.
- Development will seek to implement quarterly “compliance trainings” **by the end of calendar year 2025**. These trainings will serve as an opportunity for all grantees to be kept up to date on the latest information, train local community development employees, ask questions of staff, and foster mutually beneficial relationships with other grantees. The trainings will focus on compliance with federal regulations in HUD-assisted programs, including Fair Housing.

### **Impediment: Need for local policies or legislation**

#### **Tactics:**

- Development recognizes that each local government grantee confronts varying issues related to fair housing along with equally varying local policies, legislation, and political climates. Despite differences, local governments can learn from one another and adapt successful examples from other communities to fit their local context. Development **will continue** to encourage communication and collaboration among grantees through its role as a funder of community development activities across Ohio.
- Development **will continue** to require two-year updates to progress on implementation of tactics towards fair housing choice identified by each local government grantee. Development will note successful implementation and strategies and will communicate these examples as needed to other communities facing similar issues or seeking similar outcomes.
- Development will catalyze quarterly “compliance trainings” **upon implementation** to both foster collaboration among attendees along with information exchange on successful local policies and legislation throughout Ohio in further fair housing choice.

### **Impediment: Lack of housing availability or supply**

#### **Tactics:**

- Housing availability and supply heavily influence housing affordability. Development **will continue** to implement the same tactics identified above to address the lack of affordable housing. These tactics will further promote the development of housing to increase availability and supply.
- Development **will continue** to utilize Community Development Block Grant (CDBG) funds to build and maintain vital infrastructure such as water and sewer lines and roads. Such infrastructure helps to facilitate housing development in general but can make higher densities achievable. This can allow for more diversity in the housing options available in a community.
- Zoning and other forms of land use controls can serve to both promote and inhibit housing construction and variety. Development **will continue** to encourage local governments to evaluate local zoning and land use controls for opportunities to remediate overburdensome requirements and restrictions.

## Maps



## Map 1

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# Population Distribution 2023



## Map 2

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# Ohio Counties, County Seats and Multi-County Metropolitan Areas



## Map 3

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# Percent Population Change, 2010 to 2023



## Map 4

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# Ohio Appalachian Region



## Map 5

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# **African American Population as Percent of County Population: 2022**



## Map 6

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# Hispanic Population as Percent of County Population: 2022

## Map 7

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# Asian Population as Percent of County Population: 2022



## Map 8

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# Percent of Persons with a Disability By Census Tract



## Map 9

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# Poverty in Ohio by County



## Map 10

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# Ohio Civilian Unemployment Rate 2023

## Appendices



## **Appendix 1**

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### **Ohio County Profiles: Ohio**





## Appendix 2

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# Ohio County Profiles: Appalachia



## Appendix 3

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# Population Projections

## **Appendix 4**

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# **Ohio's Poverty Rate, Unemployment Rate and Real Per Capita Income, 1998-2018**

## **Appendix 5**

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# **Changing Poverty Rates in Ohio's 10 Largest Cities: 1999, 2007-2011 and 2014-2018**



## Appendix 6

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### Ohio's Top Employers



## **Appendix 7**

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# **History of Civil Rights in Ohio**

Appendix 7: History of Civil Rights in Ohio <sup>3</sup>	
Year	Event
1787	Northwest Ordinance (capital in Marietta, OH) declares slavery to not be permitted in Northwest Territory
1803	Ohio Constitution outlaws slavery
1835	Oberlin College admits black students
1851	Ohio Constitution Adopted- Denied the right to vote to women and African Americans
1865	Thirteenth Amendment (US) ended slavery
1867	Fourteenth Amendment (US) granted equal protection under the law
1870	Fifteenth Amendment (US) gave African-American men the right to vote
1884	Ohio passes the Ohio Public Accommodations Law, eliminating inequity in public facilities
1894	Ohio's first black State Senator elected
	Ohio Civil Rights Law passed to guarantee equal access to any public place
1923	Ohio decides to eliminate race as a criteria for voting
1949	American Housing Act of 1949
1959	Ohio Civil Rights Act passed
	Ohio Civil Rights Commission established
1965	Ohio's Laws Against Discrimination include housing discrimination
1967	Cleveland, OH elects first African-American mayor
1970	Dayton, OH elects first African-American mayor
1973	Ohio prohibits discrimination based on sex
1976	Ohio's Laws Against Discrimination include issuance of credit
1984	Ohio prohibits discrimination, based on handicap, in post-secondary institutions
1988	Ohio Civil Rights Commission signs work share agreement with HUD
2008	Ohio adds military status as protected class under civil rights laws

<sup>3</sup>"The History of Fair Housing As a Civil Right In the State of Ohio." *Ohio Development Services Agency*. Ohio State Legal Services Association. Web. 21 Apr. 2015.



## Appendix 8

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# Protected Classes - Federal Fair Housing Act and Ohio Fair Housing Law



## Appendix 8: Protected Classes - Federal Fair Housing Act and Ohio Fair Housing Law

Class	Federal Law	State Law	Differences
Disability (state)/ Handicapped (federal)	(1) a physical or mental impairment which substantially limits one or more of such person's major life activities; (2) a record of having such an impairment; or (3) being regarded as having such an impairment, but such term does not include current, illegal use or addiction to a controlled substance (as defined in section 102 of the Controlled Substances Act (21 U.S.C. 802)) [Fair Housing Act Sec 802 [42 U.S.C.3602(h)]	a physical or mental impairment that substantially limits one or more major life activities, including the functions of caring for one's self, performing manual tasks, walking, seeing, hearing, speaking, breathing, learning, and working; a record of a physical or mental impairment; or being regarded as having a physical or mental impairment [ORC 4112.01(A)(13)]	Ohio's definition is more specific.
Family Status	One or more individuals (who have not attained the age of 18 years) being domiciled with- (1) a parent or another person having legal custody of such individual or individuals; or (2) the designee of such parent or other person having such custody, with the written permission of such parent or other person. The protections afforded against discrimination on the basis of familial status shall apply to any person who is pregnant or is in the process of	(a)One or more individuals who are under eighteen years of age and who are domiciled with a parent or guardian having legal custody of the individual or domiciled, with the written permission of the parent or guardian having legal custody, with a designee of the parent or guardian; (b) Any person who is	None

## Appendix 8: Protected Classes - Federal Fair Housing Act and Ohio Fair Housing Law

	securing legal custody of any individual who has not attained the age of 18 years. [Fair Housing Act Sec 802 [42 U.S.C.3602(k)]]	pregnant or in the process of securing legal custody of any individual who is under eighteen years of age. [ORC 4112.01(A)(15)]	
National Origin	The Equal Employment Opportunity Commission defines national origin discrimination broadly as including, but not limited to, the denial of equal employment opportunity because of an individual's, or his or her ancestor's, place of origin; or because an individual has the physical, cultural or linguistic characteristics of a national origin group. [29 C.F.R. Part 1606]	The State of Ohio does not define 'national origin'	N/A
Race	Not clearly defined by Title VII of the Civil Rights Act of 1964 or in any related laws	The State of Ohio does not define 'race'	N/A
Color	Not clearly defined by Title VII of the Civil Rights Act of 1964 or in any related laws	The State of Ohio does not define 'color'	N/A

## Appendix 8: Protected Classes - Federal Fair Housing Act and Ohio Fair Housing Law

Religion	Includes all aspects of religious observance and practice, as well as belief [Title VII of the Civil Rights Act of 1964]	The State of Ohio does not define 'religion'	N/A
Sex	The terms “because of sex” or “on the basis of sex” include, but are not limited to, because of or on the basis of pregnancy, childbirth, or related medical conditions; and women affected by pregnancy, childbirth, or related medical conditions [Title VII of the Civil Rights Act of 1964]	The terms "because of sex" and "on the basis of sex" include, but are not limited to, because of or on the basis of pregnancy, any illness arising out of and occurring during the course of a pregnancy, childbirth, or related medical conditions. [ORC 4112.01(B)]	Worded slightly different
Ancestry	No clear legal definition- U.S. Supreme Court “suggests that the terms ‘national origin’ and ‘ancestry’ were considered synonymous.” [see: Espinoza v. Farah Mfg., 414 U.S. 86, 89 (1973).]	Not covered	N/A

## Appendix 8: Protected Classes - Federal Fair Housing Act and Ohio Fair Housing Law

<b>Military Status</b>	<b>Not Covered</b>	<p>A person's status in "service in the uniformed services" as defined in section 5923.05 of the Revised Code. [4112.01(A)(22)].</p> <p>"Service in the uniformed services" means the performance of duty, on a voluntary or involuntary basis, in a uniformed service, under competent authority, and includes active duty, active duty for training, initial active duty for training, inactive duty for training, full-time national guard duty, and performance of duty or training by a member of the Ohio organized militia pursuant to Chapter 5923 of the Revised Code [ORC 5923.05(A)(e)].</p>	<b>N/A</b>
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## **Appendix 9**

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# **Ohio Department of Development Standard Fair Housing Program Information Sheet**



## **Appendix 10**

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# **Fair Housing Initiatives Program (FHIP) Grants FY 2020-2024**