Stark County Analysis of Impediments to Fair Housing Choice

December 2018

Stark County HOME Consortium

City of Canton

Mullin & Lonergan Associates

Contents

Analysis of Impediments to Fair Housing Choice 2018

Stark County HOME Consortium
City of Canton

1. Introduction

Introduction to the Analysis of Impediments

The Stark County HOME Consortium, comprised of the cities of Alliance, and Massillon, and the Urban County of Stark County, and the City of Canton, have prepared an Analysis of Impediments to Fair Housing Choice to satisfy the requirements of the Housing and Community Development Act of 1974, as amended. This act requires that any community receiving HUD funds affirmatively further fair housing. As a result, the cities and Urban County are charged with the responsibility of conducting their CDBG, HOME, and ESG programs in compliance with the federal Fair Housing Act. The responsibility of compliance with the federal Fair Housing Act extends to nonprofit organizations and other entities, which receive federal funds through the entitlements in the Consortium.

Entitlement communities receiving HUD funds are required to:

- Examine and attempt to alleviate housing discrimination within their jurisdiction
- Promote fair housing choice for all persons
- Provide opportunities for all persons to reside in any given housing development regardless of race, color, religion, sex, disability, familial status, or national origin.
- Promote housing that is accessible to and usable by persons with disabilities.
- Comply with the non-discrimination requirements of the Fair Housing Act.

These requirements can be achieved through the preparation of an Analysis of Impediments to Fair Housing Choice. The Analysis of Impediments to Fair Housing Choice (AI) is a review of a jurisdiction's laws, regulations, and administrative policies, procedures, and practices affecting the location, availability, and accessibility of housing, as well as an assessment of conditions, both public and private, affecting fair housing choice.

2. Regional Profile

A. Demographic Profile

a) Demographic Trends

Stark County is facing the first decade since 1980 where it will potentially suffer a net loss of population. From 2010 to 2016 (the most recent year where estimates are available) Stark County lost 1.3% of its population, or an estimated 4,920 people. Even the Urban County, which was the fastest growing entity by a significant margin from 2000 to 2010 as people moved from urban centers to the suburbs, has largely seen its growth flatten. Massillon was the only major entity in the County to see population growth.

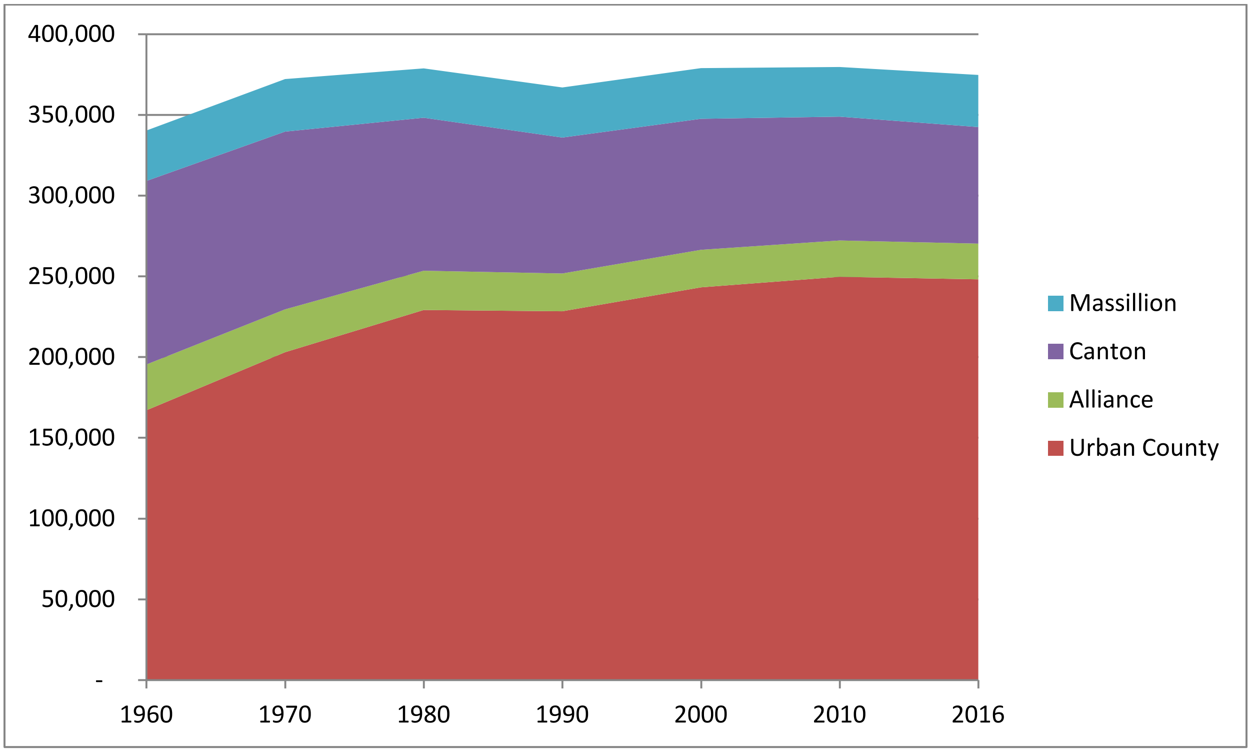
Stark County's population losses are occurring even as Ohio's population has risen slightly from 2010 to 2016, however, much of this growth has been concentrated in the rapidly growing urban areas around Columbus and Cincinnati.

Figure 2-1 Population Trends, 1960 to 2010

	1960	*1970*	*1980*	*1990*	*2000*	*2010*	*2016*	*% Change 2010 -2016*
Stark County	**340,345**	**372,210**	**378,823**	**367,003**	**378,988**	**379,682**	**374,762**	**-1.3%**
Urban County	167,116	203,071	229,221	228,442	243,257	249,771	248,210	-0.6%
Alliance	28,362	26,547	24,315	23,393	23,229	22,507	22,121	-1.7%
Canton	113,631	110,053	94,730	84,161	81,118	76,653	72,163	-5.9%
Massillon	31,236	32,539	30,557	31,007	31,384	30,751	32,268	4.9%

**Urban County is Stark County exclusive of the Cities of Alliance, Canton, and Massillon*
Source: Ohio Department of Development, DemographicsNow, U.S. Census Bureau American Community Survey 2012 – 2016 (DP05)

Figure 2-2 Population Trends, 1960 – 2016



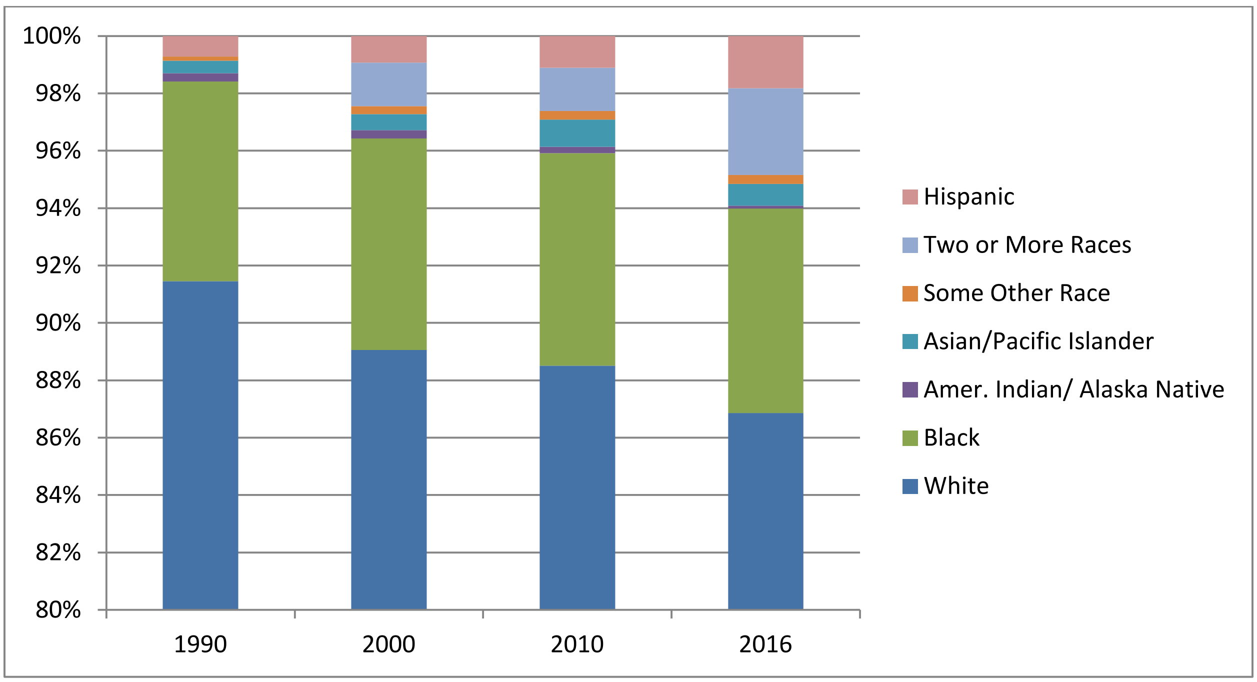
Much of the region's population loss has been among its White population, which remains the majority making up 88.4% of the total. The minority population grew at a rate of 8.6% signaling a growing diversity, though minorities still only make up 11.6% of the total population. The fastest growth in this population group was among Hispanics and those of two or more races, which grew at a rate of 62.7% and 100.1%, respectively.

Figure 2-3 Stark County Population Trends by Race, 1990 - 2016

	1990		*2000*		*2010*		*2016*		*% Change 2010 - 2016*
	#	%	#	%	#	%	#	%	
Stark County Total	**367,003**	**100.0%**	**378,988**	**100.0%**	**379,682**	**100.0%**	**374,762**	**100.0%**	**-1.3%**
White Population	338,068	92.1%	340,701	89.9%	339,815	89.5%	331,467	88.4%	-2.5%
Population Other Than White	28,935	7.9%	38,287	10.1%	39,867	10.5%	43,295	11.6%	8.6%
Black	25,715	7.0%	28,201	7.4%	28,458	7.5%	27,197	7.3%	-4.4%
Amer. Indian/ Alaska Native	1,058	0.3%	1,101	0.3%	854	0.2%	390	0.1%	-54.3%
Asian/Pacific Islander	1,611	0.4%	2,116	0.6%	3,636	1.0%	2,896	0.8%	-20.4%
Some Other Race	551	0.2%	1,060	0.3%	1,155	0.3%	1,196	0.3%	3.5%
Two or More Races	--	--	5,809	1.5%	5,764	1.5%	11,534	3.1%	100.1%
Hispanic	2,649	0.7%	3,572	0.9%	4,266	1.1%	6,939	1.9%	62.7%

Source: Demographics Now, U.S. Census Bureau American Community Survey 2012 – 2016 (DP05)

Figure 2-4 Stark County Population Composition by Race 1990 - 2016



Source: Demographics Now, U.S. Census Bureau American Community Survey 2012 – 2016 (DP05)

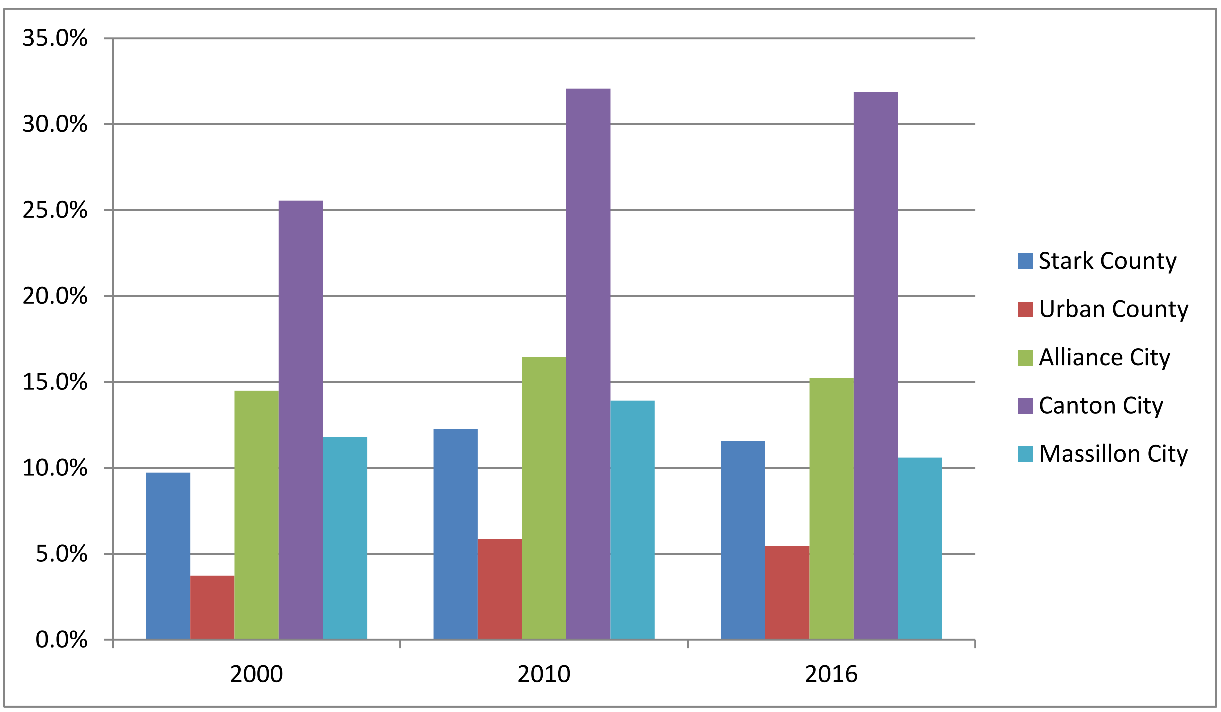
The racial composition of the Urban County and the region's cities has changed little since 2010. This comes on the heels of a decade of changes occurring across the region between 2000 and 2010. The Urban County, which is largely White, went from 3.7% minority in 2000 to 5.9% in 2010, but fell to 5.4% in 2016. Alliance and Massillon both had similar increases and then dips in their minority populations. Canton saw the largest increase growing from 25.5% minority to 32.1%, and only dropped to 31.9% in 2016.

Figure 2-5 Change in Racial Composition by Place, 2000 - 2016

	2000				2010				2016			
	White	Black	Hispanic	Percent Minority	White	Black	Hispanic	Percent Minority	White	Black	Hispanic	Percent Minority
Stark County	341,342	27,219	3,492	9.7%	329,497	28,270	5,965	12.3%	331,467	27,197	6,939	11.6%
Urban County	233,672	4,676	1,914	3.7%	233,577	5,673	2,997	5.9%	234,713	5,155	2,985	5.4%
Alliance	19,884	2,602	271	14.5%	18,651	2,304	418	16.4%	18,753	2,181	717	15.2%
Canton	60,164	16,999	1,006	25.5%	49,591	17,501	1,899	32.1%	49,155	17,534	2,320	31.9%
Massillon	27,622	2,942	301	11.8%	27,678	2,792	651	13.9%	28,846	2,327	917	10.6%

Source: U.S. Census Bureau, Census 2000 (QT-P3), Census 2010 (P9), American Community Survey 2012 - 2016 (DP05)

Figure 2-6 Percent of Minority Population by Place, 2000 – 2016



Source: U.S. Census Bureau, Census 2000 (QT-P3), Census 2010 (P9), American Community Survey 2012 - 2016 (DP05)

The increase in minorities in the region, the majority of which are Black, led to an increase in racially concentrated neighborhoods in the urban centers of Stark County. These neighborhoods often make up the areas where poverty is concentrated as well, for factors discussed in the next section of this document.

The minority population of Stark County grew at a rate of 8.6% signaling a growing diversity.
Though minorities still only make up 11.6% of the total population, this comes during a period of decline in White residents.

b) Residential Segregation Patterns

Residential segregation is a measure of the degree of separation of racial or ethnic groups living in a neighborhood or community. Typically, the pattern of residential segregation involves the existence of predominantly homogenous, White suburban communities and low income minority inner-city neighborhoods. A potential impediment to fair housing is created where either latent factors, such as attitudes, or overt factors, such as real estate practices, limit the range of housing opportunities for minorities. A lack of racial or ethnic integration in a community creates other problems, such as reinforcing prejudicial attitudes and behaviors, narrowing opportunities for interaction, and reducing the degree to which community life is considered harmonious. Areas of extreme minority isolation often experience poverty and social problems at rates that are disproportionately high. Racial segregation has been linked to diminished employment prospects, poor educational attainment, increased infant and adult mortality rates and increased homicide rates.

The distribution of racial or ethnic groups across a geographic area can be analyzed using an index of dissimilarity. This method allows for comparisons between subpopulations, indicating how much one group is spatially separated from another within a community. The index of dissimilarity is rated on a scale from 0 to 100, in which a score of 0 corresponds to perfect integration and a score of 100 represents total segregation. The index is typically interpreted as the percentage of the minority population that would have to move in order for a community or neighborhood to achieve full integration. A dissimilarity index of less than 30 indicates a low degree of segregation, while values between 30 and 60 indicate moderate segregation, and values above 60 indicate high segregation.

The dissimilarity index score is calculate using (1/2) SUM (b_i/B – w_i/ W) where: B = the total black population of the large geographic entity for which the dissimilarity index is being calculated, w_i = the white population of the i^{th} area unit, e. g. census tract, and W = the total white population of the large geographic entity for which the dissimilarity index is being calculated. The summation is over the component areal units such as census tracts.

The 2016 index used weighted calculations in order to account for the proportion of the population living inside city boundaries. A census tract's individual score will be calculated the same, however, it will be weighted based upon the proportion of people that actually live in the city boundaries. For example, if only ten percent of a tract's population live in the city, only ten percent of the tract's score will count towards the city's cumulative score. Weights were used for 2016, because some cities are annexing commercial districts in census tracts not previously occupied by the city boundaries, however, there was not an actual net gain in residents due to most of these annexations. Without the weights the scores would be heavily skewed towards segregation for cities, despite the fact that much of these tracts actually belong to the Urban County.

Figure 2-7 Dissimilarity Index 2000 and 2016

Dissimilarity Index	2000	2016
Stark County	57.8	53.6
Urban County	39.1	55.4
Alliance	48	28.6
Canton	50	36.0
Massillon	56.6	33.7

**The Census Bureau added census tracts to Stark County in 2010. The additional census tracts may have some effect on the change in scores.*
Source: Census Bureau, Decennial Census 2000 (QT-P3), American Community Survey 2012 -2016 (B02001), Calculations by Mullin & Lonergan Associates

Segregation in Stark County fell slightly but increased in the Urban County dramatically. The urban centers' scores fell by an average of 18.8 points. The Urban County's change could be due to the large increase in Blacks in the Urban County around the periphery of Canton. Also during this period, the cities' Black populations either grew only modestly or decreased, while becoming more dispersed around the city, e.g. less segregated.

Segregation in Stark County fell slightly but increased in the Urban County dramatically.
The urban centers' segregation index scores fell by an average of 18.8 points. The Urban County's large increase could be due to the large increase in Blacks in the Urban County around the periphery of Canton.

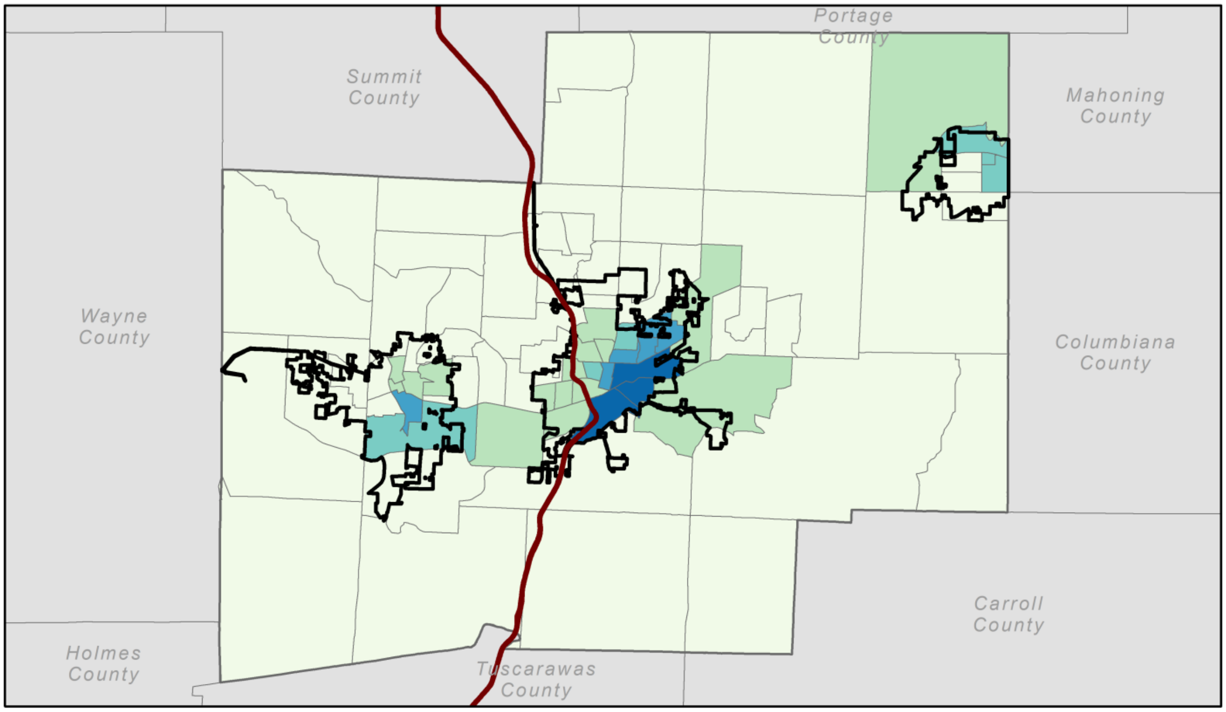
Figure 2-8 Percent Change White and Black Population 2000 - 2016

	2000			2016			Percent Change		
	Total	White	Black	Total	White	Black	Total	White	Black
Stark County	378,098	341,342	27,219	374,762	331,467	27,197	-0.9%	-2.9%	-0.1%
Urban County	242,714	233,672	4,676	247,349	234,713	5,155	1.9%	0.4%	10.2%
Alliance	23,253	19,884	2,602	22,256	18,753	2,181	-4.3%	-5.7%	-16.2%
Canton	80,806	60,164	16,999	73,027	49,155	17,534	-9.6%	-18.3%	3.1%
Massillon	31,325	27,622	29,42	32,130	28,846	2,327	2.6%	4.4%	-20.9%

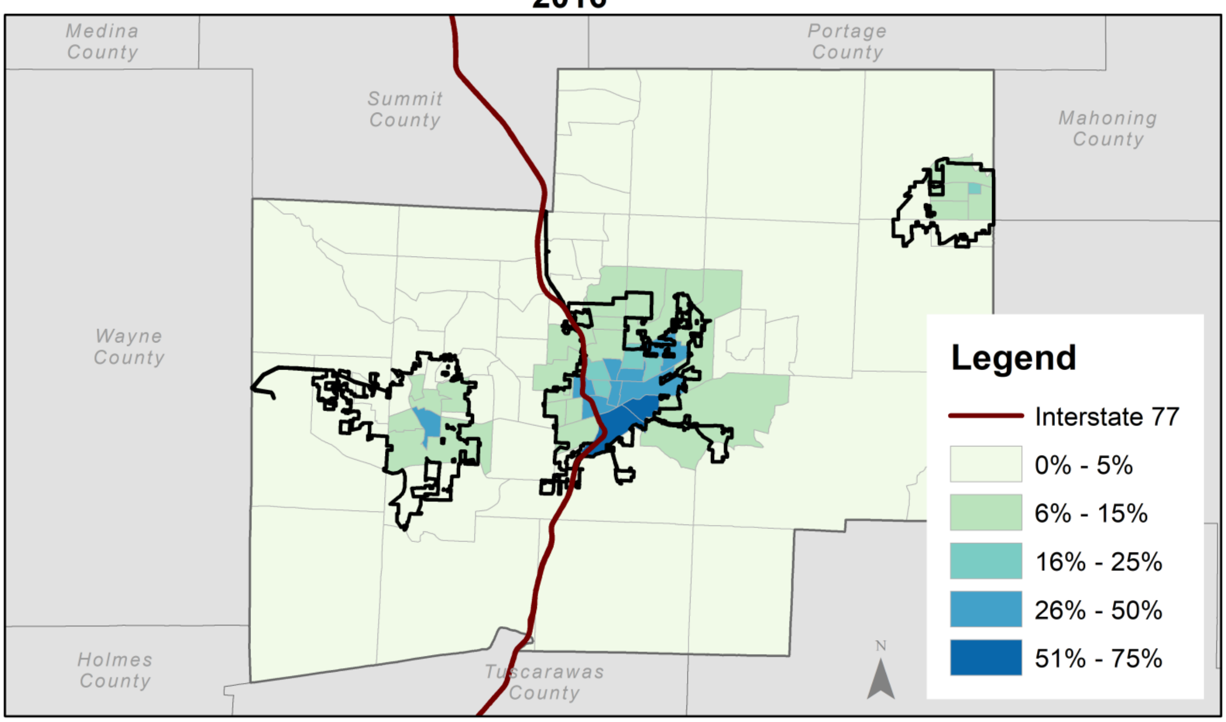
Lending context to the dissimilarity index, racial concentrations can be mapped using demographic data at the census tract level. Map 1 on the following page shows the proportion of Black residents in each census tract in 2000 and in 2016. Even though the Black population was flat between 2000 and 2016, the population became less concentrated and more dispersed around the urban centers, particularly around Canton. At the same time the entire County's White population fell by 2.9%, which will have the effect of increasing the proportion of Black residents for some census tracts.

MAP 1: BLACK RESIDENTS AS A PROPORTION OF TOTAL POPULATION, 2000 - 2016

2000



2016



Sources: U.S. Census Bureau TIGER/Line: County and Census Tract Boundaries, City Points, and Roads; Decennial Census, 2000 (QT-P3); American Community Survey, 2012-2016 (B02001)

Recognizing where there are racial and poverty concentrations, which may often overlap, can help inform the policy making process. Areas of concentrations are often the same areas where health outcomes are lower, crime is higher, and income mobility is much more difficult to achieve. Policies are needed to both alleviate poverty and create housing inside these areas, while still providing work and housing opportunities outside of these areas in order to stop or reverse concentrations of poverty and racial segregation.

For the purpose of this analysis, an area of concentration of minority persons is a census tract where the proportion of one minority group is ten percentage points higher than the total size of that group within a jurisdiction. For example, the Urban County was 2.1% Black in 2016; therefore a racially concentrated census tract in the Urban County occurs where Black residents comprise 12.1% of the residents in that census tract. Each entitlement community has its own threshold following this formula. Table 2-9 lists the census tracts that are areas of Black concentration (there were no concentrations found for other minority groups).

Table 2-9 Areas of Racial Concentration, 2016

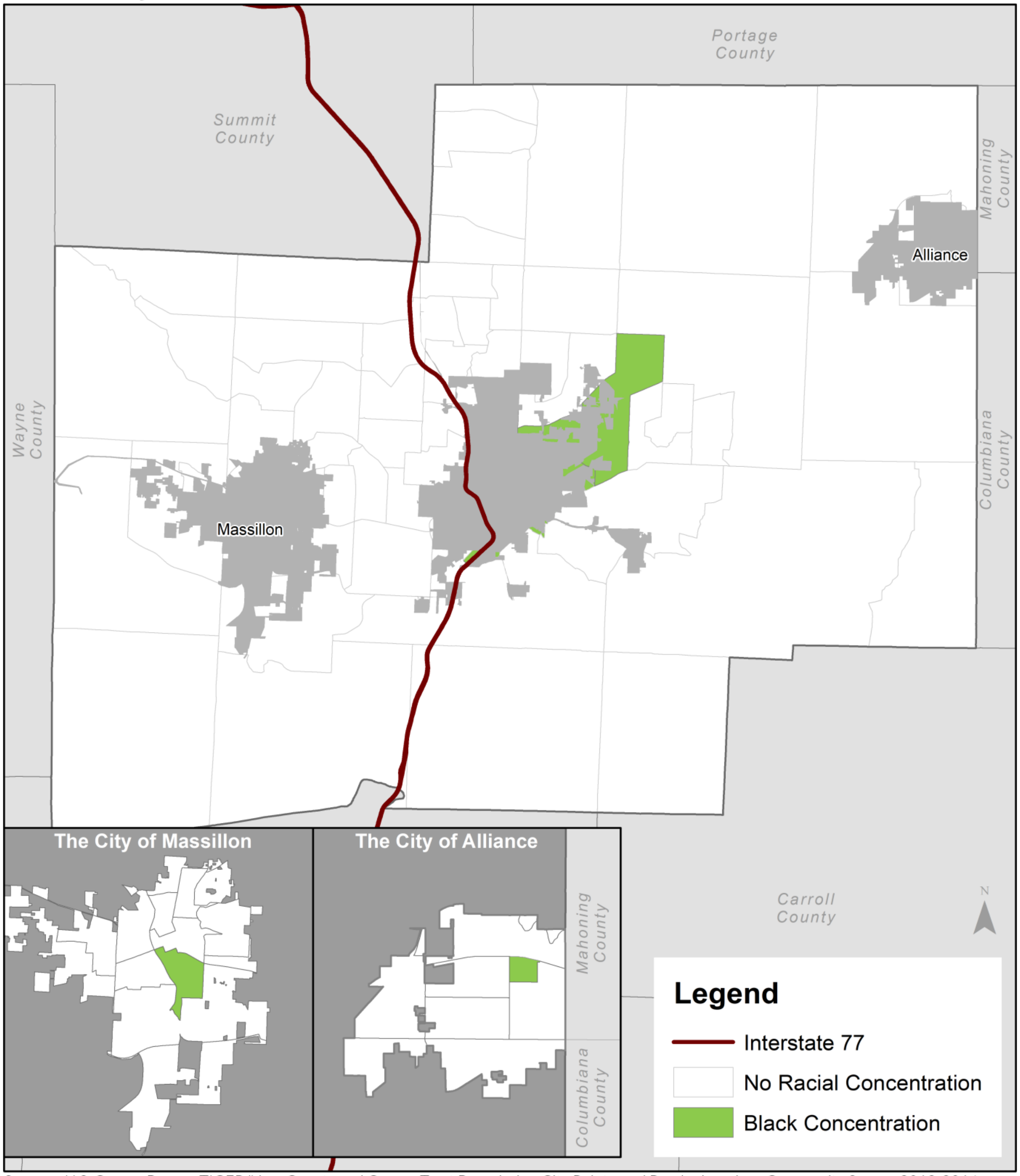
	Total Population	Percent White	Percent Black
Urban County	**248,210**	**94.6%**	**2.1%**
Census Tract 7124	7,262	78.5%	13.8%
Canton	**72,163**	**68.1%**	**24.3%**
Census Tract 7021	3,368	34.0%	63.7%
Census Tract 7023	3,566	38.3%	53.7%
Census Tract 7018	2,310	35.5%	49.7%
Census Tract 7001	1,046	59.1%	36.4%
Census Tract 7015	2,628	52.6%	35.0%
Alliance	**22,121**	**84.8%**	**9.9%**
Census Tract 7104	998	75.1%	19.5%
Massillon	**32,268**	**89.4%**	**7.2%**
Census Tract 7142	2,736	63.3%	26.5%

Source: Census Bureau, 2012 - 2016 American Community Survey (B02001)

Due to data limitations, census tracts that are in both a city and the Urban County cannot be partially analyzed based on the part that is in each separate jurisdiction. For this reason, there are four census tracts that qualify as racially concentrated that are in the Urban County and the City of Canton. For the purposes of this analysis, only one (7124) will fall under the purview of the Urban County, because most of it is outside Canton. Maps 2 and 2A on the next two pages illustrate where racially concentrated census tracts are located across the Stark Home Consortium and the City of Canton.

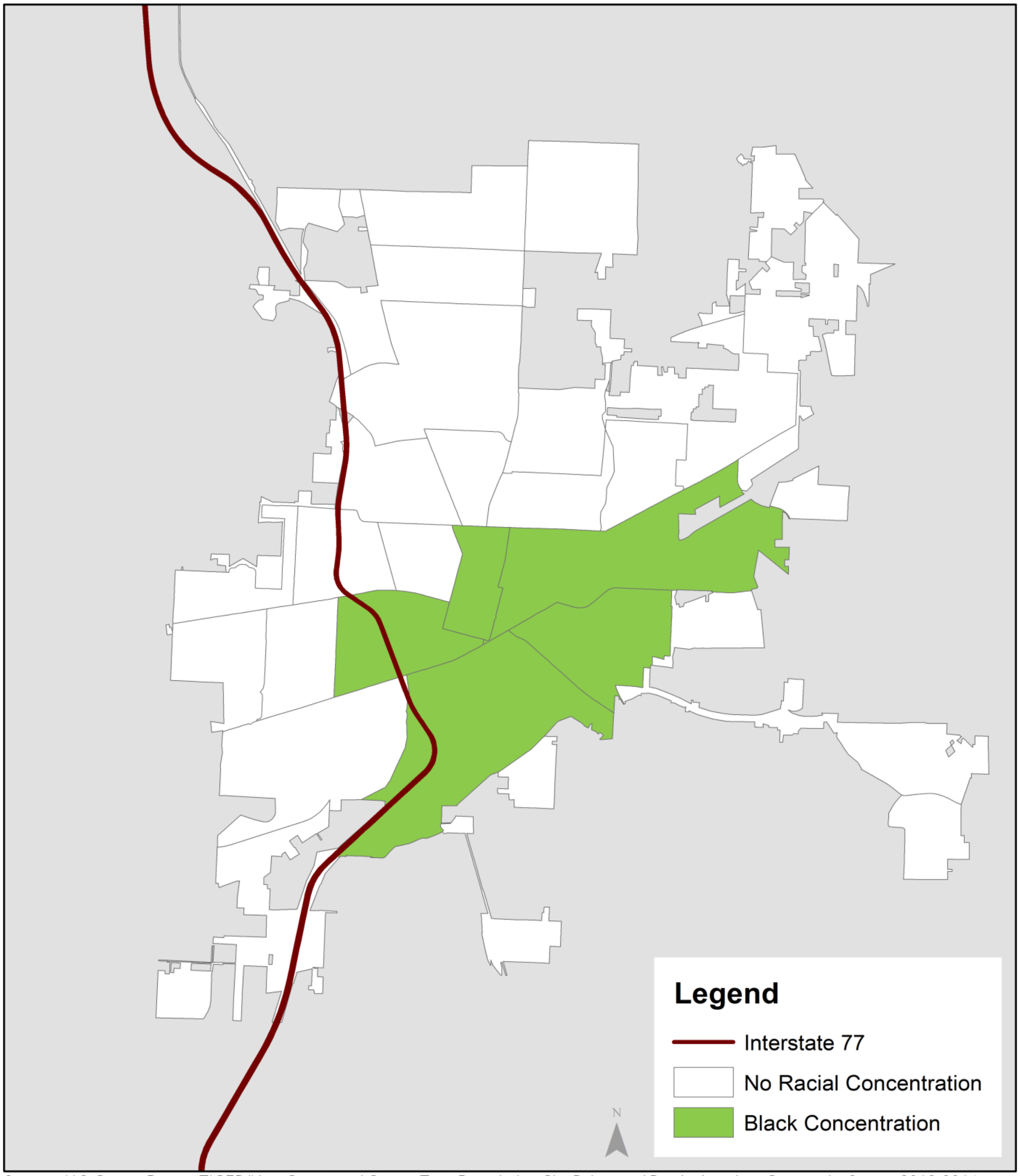
MAP 2: HOME CONSORTIUM AREAS OF RACIAL CONCENTRATION, 2016

The cities of Alliance and Massillon join with Stark County to form the HOME Consortium, while the City of Canton is not a member.



Sources: U.S. Census Bureau TIGER/Line: County and Census Tract Boundaries, City Points, and Roads; American Community Survey, 2012-2016 5-Year Estimates: Race & Ethnicity Data

MAP 2A: CITY OF CANTON AREAS OF RACIAL CONCENTRATION, 2016



Sources: U.S. Census Bureau TIGER/Line: County and Census Tract Boundaries, City Points, and Roads; American Community Survey, 2012-2016 5-Year Estimates: Race & Ethnicity Data

c) Race/Ethnicity and Income

Household income is an important factor in a family or individual's quality of life and the availability of opportunities for everything from future educational attainment to homeownership. While the share of Blacks in poverty fell in Stark County and its three major urban centers, they were still much more likely to be impoverished than Whites. In Canton, 34.8% of Black households were below the poverty threshold compared to 22.5% of Whites in 2016. Similarly, in Massillon, 25.2% of Black households were impoverished compared to 15.1% of White households. Only in Alliance were they near parity with one another with 18.4% of Blacks in poverty compared to 19.3% of Whites.

Household incomes in Stark County have failed to keep up with inflation resulting in county wide poverty rates rising. However, rates of change in poverty have not been distributed evenly. The proportion of Black households in Stark County has largely seen an increase in real incomes, while the poverty rate has fallen. The proportion of Black households in poverty has fallen even in areas where real incomes have fallen. This occurred due to more households entering higher income groups, while the total Black population has fallen by 4.4% overall. However, the median Black household income is still only 55.1% of the White median household income.

Figure 2-10 Change in Real Median Household Incomes and Poverty Rates by Race, 2008 to 2016

	Median Household Income 2008 (In 2016 dollars)	*Median Household Income 2016*	*Poverty Rate 2016*	*Change in Poverty Status 2008 - 2016*
Stark County	**$50,504**	**$48,714**	**13.8%**	**1.9%**
Whites	$53,188	$51,192	10.9%	1.5%
Blacks	$25,289	$26,843	27.2%	-10.2%
Hispanics	$37,622	$45,043	26.1%	5.8%
Alliance	**$36,169**	**$32,058**	**21.5%**	**6.5%**
Whites	$36,398	$33,267	19.3%	6.9%
Blacks	$33,806	$24,110	18.4%	-9.0%
Hispanics	$36,380	--	--	--
Canton	**$31,969**	**$30,444**	**30.7%**	**5.2%**
Whites	$38,075	$33,668	22.5%	4.5%
Blacks	$19,167	$23,863	34.8%	-11.9%
Hispanics	$40,294	--	--	--
Massillon	**$44,804**	**$42,808**	**17.9%**	**3.8%**
Whites	$46,250	$44,718	15.1%	3.6%
Blacks	$32,159	$27,929	25.2%	-10.0%
Hispanics	--	--	--	--

Sources: U.S. Census Bureau, 2006-2008 American Community Survey & 2012 - 2016 American Community Survey (DP03, B19013A, B19013B, B17001, B17001A, B17001B), Calculations by Mullin & Lonergan Associates
**Hispanic groups had large margins of error which prevents an accurate estimation of median income.*

Household incomes in Stark County have failed to keep up with inflation resulting in county wide poverty rates rising.
Poverty disproportionately affected Black households. Over 50% of White households are in the upper two income quartiles compared to only 21.5% of Black households.

Figure 2-11 Distribution of Household Income in Stark County by Race, 2016

Race/Ethnicity of Household	Total	$0 to $24,999		$25,000 to $49,999		$50,000 to $74,999		$75,000 and higher	
		#	%	#	%	#	%	#	%
All	**151,101**	**36,221**	**24.0%**	**41,314**	**27.3%**	**29,322**	**19.4%**	**44,244**	**29.3%**
White	136,538	29,839	21.9%	36,877	27.0%	27,587	20.2%	42,235	30.9%
Black	11,223	5,198	46.3%	3,613	32.2%	1,177	10.5%	1,235	11.0%
Hispanic	1,953	685	35.1%	377	19.3%	339	17.4%	552	28.3%

Source: U.S. Census Bureau, 2006-2008 and 2012 - 2016 American Community Survey (B19001, B19001A, B19001I)
Note: Margin of error for Hispanic households is high, so estimations may not be as accurate as other groups.

Much of the gains in household income have gone to Whites even as the poverty rate for Whites ticked upward slightly and real median incomes across all groups remains largely stagnant. This suggests that incomes may be drifting apart, especially along racial lines, exacerbating income inequality between households moving up the income ladder and households left behind. Further spreading of income will also exacerbate racial inequities since over 50% of White households are in the upper two income quartiles compared to only 21.5% of Black households. There have also been significant gains in the share of Hispanic households in all income groups, which is likely due to Hispanics' rapidly growing population.

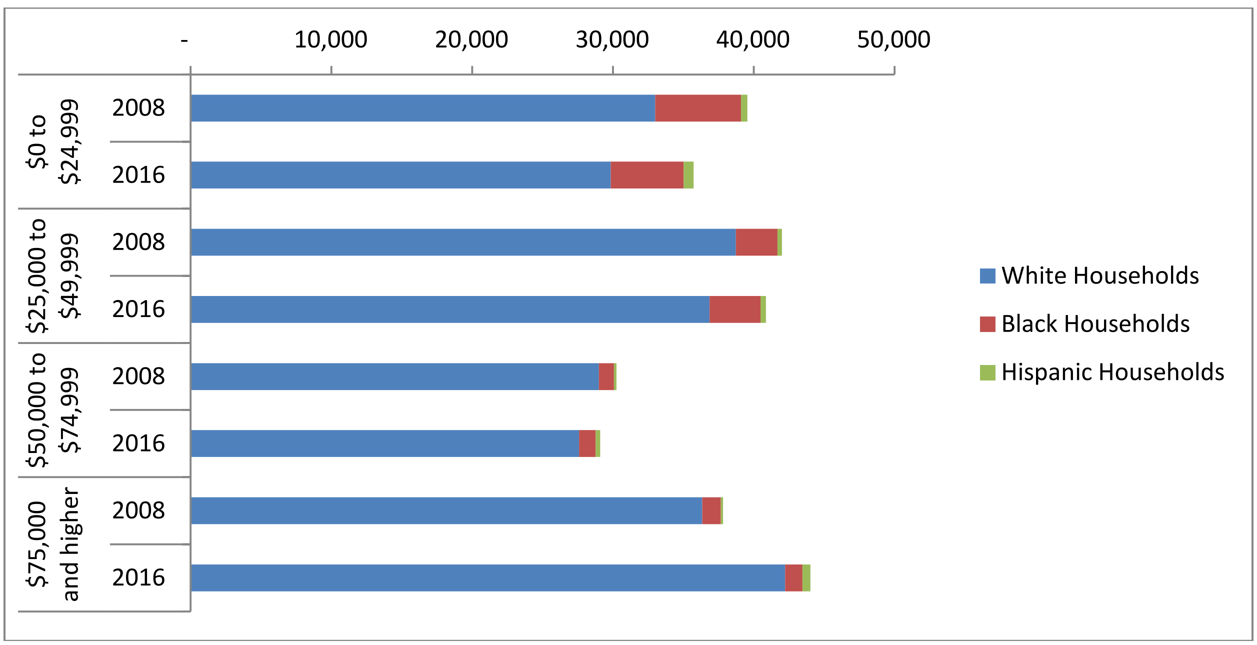
Household income has risen primarily for White families.
Over 50% of White households are already in the upper two income quartiles compared to only 21.5% of Black households. This means that income inequality is widening along racial lines.

Figure 2-12 Change in Distribution of Household Income in Stark County by Race, 2008 - 2016

Race/Ethnicity of Household	*Total Percent Change*	*$0 to $24,999*	*$25,000 to $49,999*	*$50,000 to $74,999*	*$75,000 and higher*
		Percent Change	**Percent Change**	**Percent Change**	**Percent Change**
All	**-0.01%**	**-10.1%**	**-1.7%**	**-3.5%**	**15.1%**
White	-0.07%	-9.6%	-4.8%	-4.9%	16.2%
Black	-1.96%	-14.8%	21.9%	10.9%	-6.3%
Hispanic	76.10%	50.2%	18.2%	93.7%	247.2%

Source: U.S. Census Bureau, 2006-2008 and 2012 - 2016 American Community Survey (B19001, B19001A, B19001I)
Note: Margin of error for Hispanic households is high, so estimations may not be as accurate as other groups.

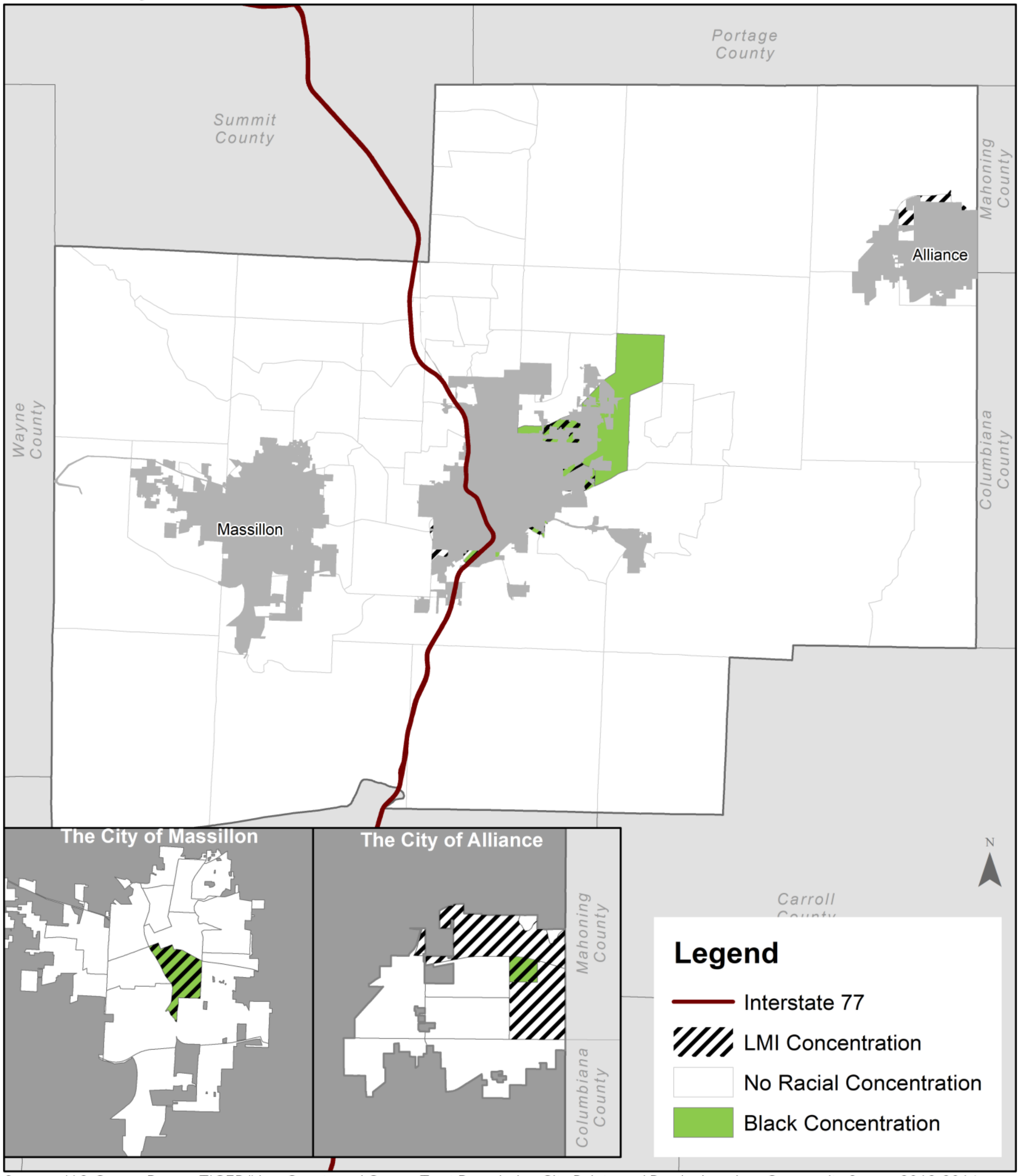
Figure 2-13 Distribution of Household Income in Stark County by Race and Year, 2008 – 2016



Areas of racial concentration also tend to be areas of concentration of low and moderate income (LMI) persons. Areas of a concentration of LMI persons are census tracts where 51% or more of residents earn 80% or less of the area's median income. Maps 3 and 3A on the following pages show census tracts that are areas of LMI concentration in the Stark Home Consortium and the City of Canton.

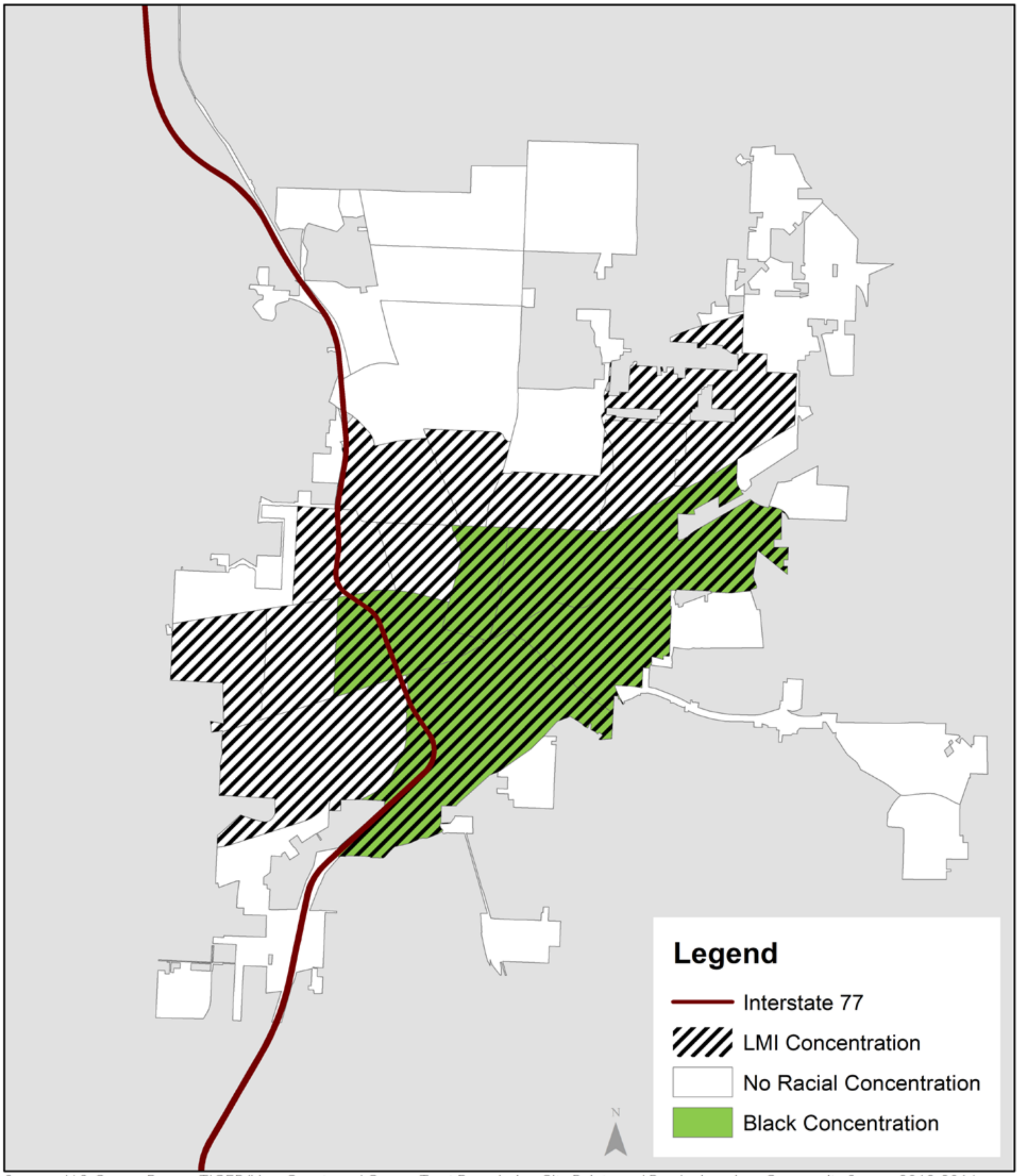
MAP 3: HOME CONSORTIUM AREAS OF LMI CONCENTRATION, 2016

The cities of Alliance and Massillon join with Stark County to form the HOME Consortium, while the City of Canton is not a member.



Sources: U.S. Census Bureau TIGER/Line: County and Census Tract Boundaries, City Points, and Roads; American Community Survey, 2012-2016 5-Year Estimates: Race & Ethnicity and LMI Data

MAP 3A: CITY OF CANTON AREAS OF RACIAL CONCENTRATION, 2016



Sources: U.S. Census Bureau TIGER/Line: County and Census Tract Boundaries, City Points, and Roads; American Community Survey, 2012-2016 5-Year Estimates: Race & Ethnicy Data

Across the region, census tracts that reach areas of highly concentrated LMI are also racially concentrated – Black median household income in 2016 was $26,843, much lower than 80% of Stark County's median income. The table below shows the census block groups for Stark County. Of the 276 block groups in Stark County, 66 reach the threshold of having an LMI concentration – that is meeting 51% LMI.

Figure 2-14 Census Block Groups Containing a 51% or More of LMI Residents

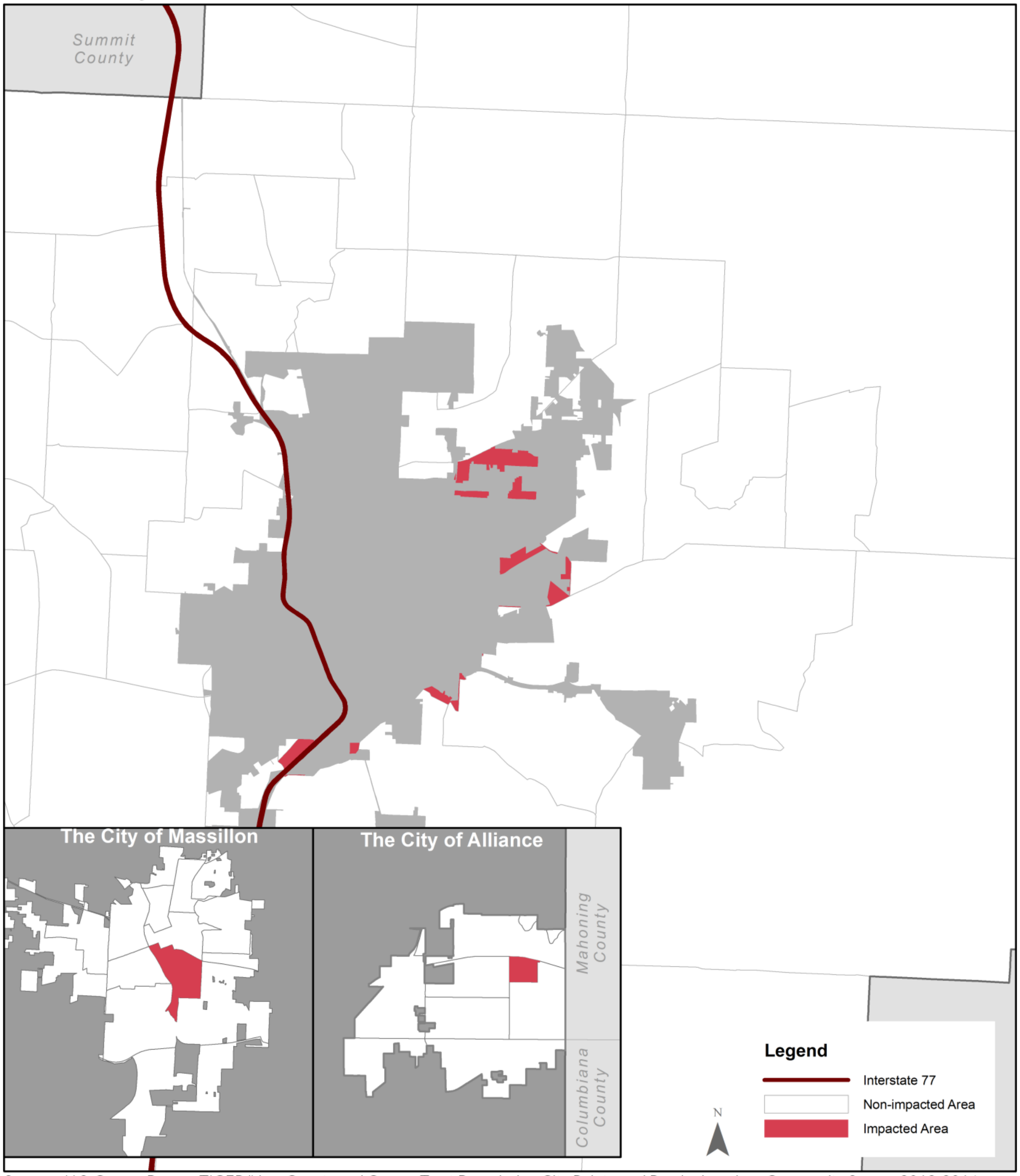
Census Tract	Block Group	Percent LMI	Census Tract	Block Group	Percent LMI
7001	1	82.7%	**7023**	1	80.7%
7002	1	73.2%	**7023**	2	89.9%
7002	2	61.5%	**7025**	3	66.5%
7002	3	56.9%	**7025**	4	86.7%
7003	1	77.7%	**7102**	1	50.9%
7003	2	67.0%	**7102**	3	62.7%
7004	3	53.5%	**7102**	4	62.9%
7005	1	61.2%	**7102**	5	63.9%
7005	2	71.2%	**7103**	1	61.2%
7006	1	59.4%	**7104**	1	95.5%
7006	2	61.7%	**7105**	1	63.7%
7006	3	62.9%	**7105**	2	60.9%
7007	4	70.6%	**7105**	3	64.5%
7008	3	89.0%	**7105**	4	57.7%
7010	1	67.5%	**7108**	1	54.1%
7010	2	95.6%	**7108**	5	52.1%
7010	3	66.2%	**7114.12**	2	60.0%
7011	2	53.9%	**7115.01**	3	51.6%
7012	2	65.3%	**7117**	6	55.0%
7012	3	62.2%	**7123**	2	51.2%
7013	1	80.6%	**7124**	2	58.6%
7013	2	68.4%	**7131**	3	51.9%
7015	1	86.7%	**7131**	4	60.8%
7015	2	71.4%	**7132.01**	1	68.9%
7015	3	68.0%	**7134.02**	2	51.1%
7017	2	77.5%	**7137**	1	51.4%
7017	3	75.0%	**7141**	3	51.4%
7018	1	65.9%	**7142**	1	57.6%
7018	2	77.9%	**7142**	3	89.6%
7018	3	87.4%	**7142**	4	63.2%
7021	1	82.1%	**7143.02**	2	67.7%
7021	2	59.7%	**7148.01**	3	53.6%
7021	3	71.4%	**7150**	2	59.1%

Sources: U.S. Census Bureau, 2012 – 2016 American Community Survey (B02001); HUD LMI Estimates

Maps 4 and 4A on the following pages portray impacted areas, which are defined as areas of concentration of lower income persons and concentrations of minority persons.

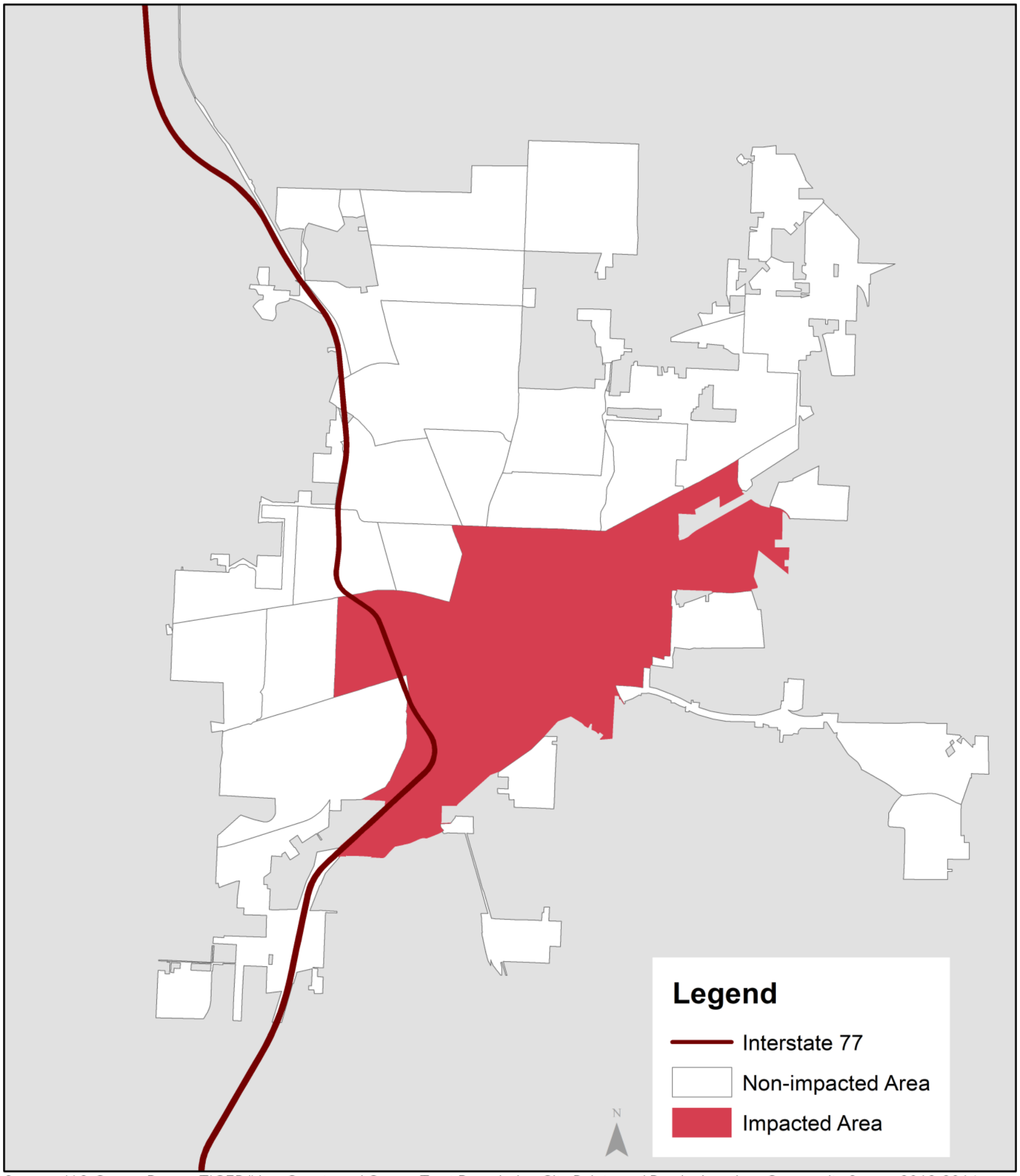
MAP 4: HOME CONSORTIUM IMPACTED AREAS, 2016

The cities of Alliance and Massillon join with Stark County to form the HOME Consortium, while the City of Canton is not a member.



Sources: U.S. Census Bureau TIGER/Line: County and Census Tract Boundaries, City Points, and Roads; American Community Survey, 2012-2016 5-Year Estimates: Race & Ethnicy and LMI Data

MAP 4A: CANTON IMPACTED AREAS, 2016



Sources: U.S. Census Bureau TIGER/Line: County and Census Tract Boundaries, City Points, and Roads; American Community Survey, 2012-2016; 5-Year Estimates: Race & Ethnicity, LMI Data; SMHA

Figure 2-15 below shows the census tracts that are areas impacted by both high concentrations of minorities and LMI residents.

Figure 2-15 Impacted Areas in Stark County, 2016

	Total Population	Percent Black	Percent LMI
Alliance			
Census Tract 7104	998	19.5%	95.5%
Canton			
Census Tract 7001	1,046	36.4%	82.6%
Census Tract 7015	2,628	35.0%	74.0%
Census Tract 7018	2,310	49.7%	74.2%
Census Tract 7021	3,368	63.7%	72.1%
Census Tract 7023	3,566	53.7%	84.7%
Massillon			
Census Tract 7142	2,736	26.5%	68.2%

Source: U.S. Census Bureau, American Community Survey 2012-2016 (B02001); HUD FY2018 LMI Estimates (Based on 2010 ACS)

Ultimately, widening inequality will affect the opportunities of over half of Stark Counties' households with the Black population facing a disproportionate amount of the burden. In terms of housing, these households will face restricted choice across the county and reduced access to housing. This results in continuing geographic concentrations of poverty, which has been shown to cause increased crime rates, levels of psychological distress and lower levels of educational attainment.[1] Poverty is also associated with poor health outcomes with Black families bearing the brunt of this burden. A study by the Ohio Department of Health showed that Black infant mortality per 1,000 live births is 15.2 compared to 5.8 for White infants.[2] One of the objectives of fair housing policy is to mitigate these disparities through an equality of opportunity to access services like healthcare, which is often determined by where an individual lives.

[1] Office of Policy Development and Research, Department of Housing and Urban Development: https://www.huduser.gov/portal/periodicals/em/winter11/highlight2.html

[2] Ohio Department of Health, 2016 Ohio Infant Mortality Data: General Findings

Impacted areas are the confluence of areas that are greater than 51% LMI and have high concentrations of ethnic or racial minorities.

Investments in these areas are more likely to have the greatest impact on alleviating poverty in the short-term, however, care must be taken to also provide affordable housing opportunities in other areas of the County.

- *Alliance has 1 census tract that is an impacted area (7104).*
- *Canton has 5 census tracts that are impacted areas (7001, 7015, 7018,7021, 7023).*
- *Massillon has 1 census tract that is an impacted area (7142).*

d) Disabilities and Income

The Census Bureau defines a disability as a long-lasting physical, mental, or emotional condition that can make it difficult for a person to do activities such as walking, climbing stairs, dressing, bathing, learning, or remembering. This condition can also impede a person from being able to go outside the home alone or to work at a job or business.

The Fair Housing Act prohibits discrimination based on physical, mental, or emotional handicap, provided "reasonable accommodation" can be made. Reasonable accommodation may include changes to address the needs of disabled persons, including adaptive structural (e.g., constructing an entrance ramp) or administrative changes (e.g., permitting the use of a service animal or allowing group homes where zoning otherwise prohibits it). In the region, 6.5% of the population suffers from some sort of disability, down from 11.2% in 2012 and 17.7% in 2000.

Figure 2-16 Poverty by Disability Status

	% of Population with Disability	*% of Disabled persons living in poverty*
Stark County	6.5%	36.9%
Urban County	5.3%	18.0%
Alliance	9.7%	68.5%
Canton	9.1%	79.0%
Massillon	7.6%	46.6%

Source: U.S. Census Bureau, American Community Survey 2012 – 2016 (B23024)

According to the National Organization on Disabilities, a significant income gap exists for persons with disabilities, given their lower rate of employment. In Stark County 36.9% of disabled persons are impoverished compared to only 13.8% of persons without a disability in the County. The effects are worse in urban centers like Canton where 79% of disabled persons are living in poverty compared to

5.2% of the population. Canton and Alliance also have larger proportions of their population that are disabled at nearly 10% each.

In the region, 6.5% of the population suffers from some sort of disability, down from 11.2% in 2012 and 17.7% in 2000.
Stark County's disabled population is more likely to be in poverty – 36.9% of disabled persons are impoverished compared to 13.8% of persons without a disability.

e) Familial Status and Income

The Census Bureau groups households into two primary groups: "family" and "nonfamily." A family household consists of a group of people who are related by marriage, birth, or adoption living in the same housing unit. These groups can then be further broken down based on gender of the householder, marital status, and whether or not there are children present. A nonfamily household is a housing unit where the householder (person whose name the housing unit is owned or rented) lives alone or with other nonfamily members.

Women were given protection against discrimination under Title VIII of the Civil Rights Act of 1968 (CRA). The CRA was later amended to provide additional protections to families with children. Except in limited circumstances involving elderly housing and owner-occupied buildings of one to four units, it is unlawful to refuse to rent or sell to families with children.

Figure 2-17 Change in Households by Type over Time, 1990 – 2016

	1990	*2000*	*2010*	*2016*	*Percent Change 2000 - 2016*
Total Households	**139,392**	**148,323**	**150,921**	**151,101**	**1.9%**
Family Households	102,070	103,069	101,282	99,415	-3.5%
Nonfamily Households	37,322	45,254	49,841	51,686	14.2%

Sources: U.S. Census Bureau, Census 1990 (SFT-3), Census 2000(SF-3), 2012-2016 American Community Survey (B11001)

The number of households in Stark County has grown by only 1.9% since 2000; however, the composition of household type has changed drastically over this time period. There has been a rapid increase in the number of nonfamily households while the number of family households dropped by 3.5%.

Figure 2-18 Number of Households by Type, 2016

	Stark County		Urban County		Alliance		Canton		Massillon	
	#	%	#	%	#	%	#	%	#	%
Total Households	**151,101**	**100%**	**98,951**	**100%**	**8,581**	**100%**	**30,542**	**100%**	**13,025**	**100%**
Married Couple Households	73,126	48.4%	55,634	56.2%	3,064	35.7%	8,855	29.0%	5,572	42.8%
Male-Headed Family Households	7,830	5.2%	4,677	4.7%	406	4.7%	1,756	5.7%	991	7.6%
Female-Headed Family Households	18,459	12.2%	9,082	9.2%	1,467	17.1%	6,344	20.8%	1,566	12.0%
Nonfamily Households	51,686	34.2%	29,558	29.9%	3,644	42.5%	13,587	44.5%	4,896	37.6%

Source: Census Bureau, American Community Survey 2012 - 2016 (B11001)

The composition of household type is not spread evenly across Stark County. The Urban County is 56.2% married couple households compared to 48.4% of the whole county. Stark County's three urban centers have much higher rates of nonfamily households.

The urban centers also contain much higher rates of female-headed family households – 20.8% in Canton compared to only 9.2% in the Urban County. Female-headed family households, especially those with children, tend to face more difficulty gaining access to housing due to lower than average incomes, less money available to budget for housing, and the unwillingness of some landlords to rent their units to families with children.

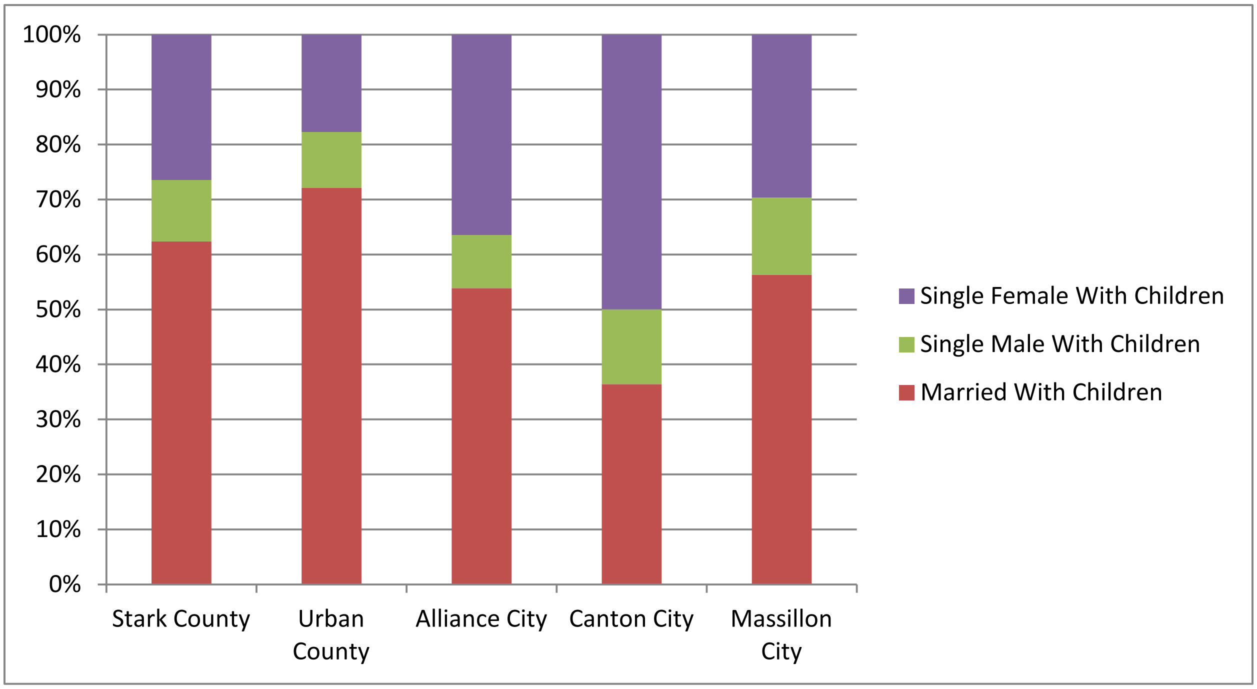
Figure 2-19 Households with Children by Type of Householder, 2016

	Stark County		Urban County		Alliance		Canton		Massillon	
	#	%	#	%	#	%	#	%	#	%
Households with Children	40,166	100%	26,240	100%	2,299	100%	8,276	100%	3,348	100%
Married with Children	25,052	62.4%	18,912	72.1%	1,239	53.9%	3,015	36.4%	1,886	56.3%
Male with Children	4,497	11.2%	2,679	10.2%	222	9.7%	1,126	13.6%	469	14.0%
Female with Children	10,617	26.4%	4,650	17.7%	838	36.5%	4,135	50.0%	993	29.7%

Source: Census Bureau, American Community Survey 2012 - 2016 (B11003)

Some parts of Stark County have a greater concentration of female headed households with children than others. While 26.4% of Stark County's households with children are headed by females, 50% of Canton's households are female led. That amounts to 13.5% of all of Canton's households. The high rate of single mother households in Canton is likely a strong contributor to the city's high poverty rate.

Figure 2-20 Households with Children Below Poverty Level by Type, 2016



Source: Census Bureau, American Community Survey 2012 - 2016 (B17010)

The poverty rate among female-headed households with children is significantly higher than both married-couple families and male-headed households with children across all of Stark County. Even the Urban County, where the median income in 2016 was highest, had 59.4% of female-headed households with children below the poverty level. Canton had the highest rate at 76.1%. Expanding housing choice for female-headed households with children can lift these families out of poverty, while also benefitting the next generation.

Figure 2-21 Households with Children and Income Below Poverty Level, 2016

	Stark County		*Urban County*		*Alliance*		*Canton*		*Massillon*	
	#	*%*	*#*	*%*	*#*	*%*	*#*	*%*	*#*	*%*
Total	**8,167**	**100%**	**2,671**	**100%**	**721**	**100%**	**3,972**	**100%**	**803**	**100%**
Married-Couple Families	1,711	21.0%	681	25.5%	173	24.0%	611	15.4%	246	30.6%
Male-Headed Family Households	959	11.7%	403	15.1%	102	14.1%	337	8.5%	117	14.6%
Female-Headed Family Households	5,497	67.3%	1,587	59.4%	446	61.9%	3,024	76.1%	440	54.8%

Source: Census Bureau, American Community Survey 2012 - 2016 (B17010)

The urban centers contain much higher rates of female-headed family households.

For example, 20.8% of Canton's households are headed by females compared to only 9.2% in the Urban County. The poverty rate among female-headed households with children is significantly higher than both married-couple families and male-headed households with children across all of Stark County – 67.3% of the County's households with children in poverty are female-headed.

f) Ancestry and Income

It is illegal to refuse the right to housing based on place of birth or ancestry. Foreign born populations tend to cluster in the same neighborhoods. They often have a limited ability to speak and understand English and lack knowledge about their rights, which can be a barrier to earning enough income to climb out of poverty or secure safe and adequate housing.

Figure 2-22 Ratio of Income by Nativity, 2008 - 2016

	Stark County 2008			*Stark County 2016*		
	% Foreign Born	*% Living under 200% of Poverty Level*		*% Foreign Born*	*% Living under 200% of Poverty Level*	
		One or More Foreign-Born Parents	*Only Native Parents*		*One or More Foreign-Born Parents*	*Only Native Parents*
Stark County	2.0%	36.9%	37.7%	2.1%	52.2%	42.0%
Urban County	2.3%	26.5%	34.4%	2.1%	42.5%	26.2%
Alliance	1.3%	100.0%	65.7%	2.0%	11.6%	68.8%
Canton	1.9%	43.0%	65.4%	2.0%	85.9%	82.7%
Massillon	0.7%	29.6%	39.6%	2.0%	67.4%	54.5%

Source: American Community Survey 2012 -2016 (B05002, B05010)

The proportion of people born outside the United States has risen slightly in Stark County. This growth has been distributed unevenly. Massillon saw the most growth with 2% of residents born outside the U.S. in 2016 compared to only 0.7% of its population in 2008. The proportion of foreign-born residents in the Urban County fell from 2.3% in 2008 compared to 2.1% in 2016.

Families where at least one of the parents have been born outside the United States experienced greater rates of poverty than the native born population in 2016. In 2008, 36.9% of families in Stark

County with a foreign-born parent were living under 200% of the poverty level, while in 2016 that proportion jumped to 52.2%. Canton had the highest rate of poverty and near poverty among these families; however, it is only 3.2% higher than families with only native parents. The Urban County had the largest disparity between families with foreign-born parents and only native parents. Almost half of families with foreign-born parents (42.5%) were living at 200% of the poverty level, compared to only 26.2% of families with only native-born parents.

One of the reasons for higher poverty among foreign-born parents includes limited English proficiency (LEP). A family with at least one LEP parent will have a more difficult time accessing services and understanding their rights. This can make it difficult to access housing and job markets. Stark County and its major urban centers had small LEP populations in 2016, however, stakeholders in the area have reported that this population is growing.

Figure 2-23 Population with Limited English Proficiency 2016

Population with Limited English Proficiency, Ages 5+	*Alliance*		*Canton*		*Massillon*		*Stark*	
	#	*%*	*#*	*%*	*#*	*%*	*#*	*%*
Spanish LEP	0	0.0%	512	0.8%	184	0.6%	1034	0.3%

Source: U.S. Census Bureau, American Community Survey 2012 – 2016 (B16004)

Families where at least one of the parents have been born outside the United States experienced greater rates of poverty than the native born population in 2016.
52.2% of families with a foreign-born parent were living under 200% of the poverty level.

g) Protected Class Status and Income

Protected classes often have a difficult time obtaining housing due to issues with employment and income. Minorities, single mothers, and the disabled experience higher rates of unemployment and lower wages even though they participate in the labor market at similar rates as white males. Successfully applying for a mortgage or even obtaining a lease becomes much more difficult for these populations, which severely limits housing choice.

In 2016, Blacks participated in the labor force at higher rates than Whites by 2 percentage points, but experience significantly higher unemployment rates – 12.6% for Blacks compared to 4% for Whites. This was particularly pronounced in Canton where Black unemployment was three times higher than White unemployment. The Black unemployment rate was lowest in the Urban County at 6.6%, however, it was still 3.2 percentage points higher than Whites in the Urban County. Hispanic unemployment was significantly higher than White unemployment as well, especially in Alliance; however, the margin of error for Hispanic unemployment counts was very high, reducing the reliability of any estimates. Minority unemployment and labor force participation rates in Stark County are similar to those of the entire state of Ohio, which indicates these are problems not isolated to Stark County and its urban centers.

The median household income for Blacks is equivalent to only 52.4% of the median household income for Whites in Stark County. Black households can expect to earn more in the urban centers; however, it is still only on average 68.6 % of the White median household income across each of the three cities. Hispanics fair slightly better in Stark County with 88% of the White median household income; however, high margins of error prevent analysis at the city level.

Blacks participated in the labor force at higher rates than Whites by 2 percentage points

However, they experience significantly higher unemployment rates – 12.6% unemployment for Blacks compared to 4% for Whites. Additionally, the median household income for Blacks is only 52.4% of the median household income for Whites in Stark County.

Figure 2-24 Minority Household Income as a Percentage of White Median Household Income 2016

	Median Household Income 2016	*% of White Median Household Income*
Stark County	**$48,714**	**--**
Whites	$51,192	--
Blacks	$26,843	52.4%
Hispanics	$45,043	88.0%
Alliance	**$32,058**	**--**
Whites	$33,267	--
Blacks	$24,110	72.5%
Canton	**$30,444**	**--**
Whites	$33,668	--
Blacks	$23,863	70.9%
Massillon	**$42,808**	**--**
Whites	$44,718	--
Blacks	$27,929	62.5%

Source: U.S. Census Bureau, American Community Survey 2012 – 2016 (B19013A, B19013B, B19013H)

** Note: Hispanic median income given when margin of error does not exceed 30% of estimated income.*

Women are participating in the labor force at slightly lower rates than men and generally experience lower rates of unemployment than men, except for in Alliance, where the female unemployment rate was 11.2% compared to 7.2% for males. Stakeholders expressed anecdotal evidence that inadequate transportation and childcare in the area prevented women in Alliance from accessing work in their fields. In 2016, the Stark County unemployment rate was 4.9% for women and 6.4% for men.

Figure 2-25 Labor Force Participation Rate by Gender and Race, 2016

	Ohio		Stark County		Urban County		Alliance		Canton		Massillon	
	Total	%	Total	%	Total	%	Total	%	Total	%	Total	%
Total CLF	**9,255,859**		**302,645**		**203,397**		**17,709**		**55,821**		**25,718**	
Labor Force Participation Rate	5,858,959	63.3%	191,574	63.3%	133,999	65.9%	9,970	56.3%	31,427	56.3%	16,177	62.9%
Employed	5,437,114	58.7%	177,015	58.5%	126,320	62.1%	8,664	48.9%	27,373	49.0%	14,656	57.0%
Unemployed	421,845	4.6%	14,560	4.8%	7,616	3.7%	1,306	7.4%	4,117	7.4%	1,521	5.9%
Male CLF	**3,385,123**		**106,033**		**71,200**		**5,957**		**19,681**		**9,195**	
Male Labor Force Participation Rate	2,748,720	81.2%	88,962	83.9%	61,519	86.4%	4,587	77.0%	15,351	78.0%	7,503	81.6%
Male Employed	2,553,561	75.4%	82,201	77.5%	57,989	81.4%	4,156	69.8%	13,279	67.5%	6,775	73.7%
Male Unemployed	195,159	5.8%	6,761	6.4%	3,529	5.0%	431	7.2%	2,072	10.5%	728	7.9%
Female CLF	**3,452,379**		**110,295**		**72,619**		**6,033**		**22,459**		**9,184**	
nale Labor Force Participation Rate	2,534,046	73.4%	82,280	74.6%	55,388	76.3%	4,054	67.2%	16,013	71.3%	6,824	74.3%
Female Employed	2,376,935	68.8%	76,850	69.7%	52,798	72.7%	3,381	56.0%	14,364	64.0%	6,305	68.7%
Female Unemployed	157,111	4.6%	5,430	4.9%	2,589	3.6%	673	11.2%	1,649	7.3%	519	5.6%
White CLF	**7,577,894**		**269,120**		**192,004**		**15,033**		**39,174**		**22,909**	
Labor Force Participation Rate	4,804,385	63.4%	169,546	63.0%	123,173	64.2%	8,464	56.3%	23,544	60.1%	14,364	62.7%
Employed	4,520,926	59.7%	158,695	59.0%	116,688	60.8%	7,456	49.6%	21,448	54.8%	13,100	57.2%
Unemployed	283,459	3.7%	10,851	4.0%	6,484	3.4%	1,007	6.7%	2,095	5.3%	1,264	5.5%
Black CLF	**1,080,650**		**20,818**		**4,404**		**1,828**		**12,676**		**1,910**	
Labor Force Participation Rate	663,519	61.4%	13,532	65.0%	2,782	63.2%	1,082	59.2%	8,480	66.9%	1,186	62.1%
Employed	558,683	51.7%	10,907	52.4%	2,492	56.6%	927	50.7%	6,462	51.0%	1,024	53.6%
Unemployed	104,836	9.7%	2,625	12.6%	289	6.6%	155	8.5%	2,018	15.9%	162	8.5%
Hispanic CLF	**265,654**		**4,647**		**2,004**		**462**		**1,660**		**521**	
Labor Force Participation Rate	181,442	68.3%	3,244	69.8%	1,469	73.3%	260	56.3%	1,152	69.4%	361	69.3%
Employed	163,479	61.5%	2,559	55.1%	1,154	57.6%	129	27.9%	990	59.6%	285	54.7%
Unemployed	17,963	6.8%	684	14.7%	314	15.7%	131	28.4%	162	9.8%	76	14.6%

Source: U.S. Census Bureau, 2012-2016 American Community Survey (S2301)

B. Housing Market

a) Housing Inventory

Housing stock in the region has increased in the three urban centers and in the Urban County from 2000 to 2016. The increase in housing stock occurred over a period of population decline and changes in familial structure. The total population in Stark County fell from 2000 to 2016, while the number of households increased, leading to a need for an increase in the number of housing units. The Urban County's share of housing stock has risen to 63.3% since 2010, while the urban centers' shares have either stagnated or fallen. The faster pace of suburban development continues a trend that was present from 2000 to 2010. Maps 5 and 5A on the following pages portray the areas where the number of housing units increased and decreased.

Figure 2-26 Number of Housing Units, 2000 - 2016

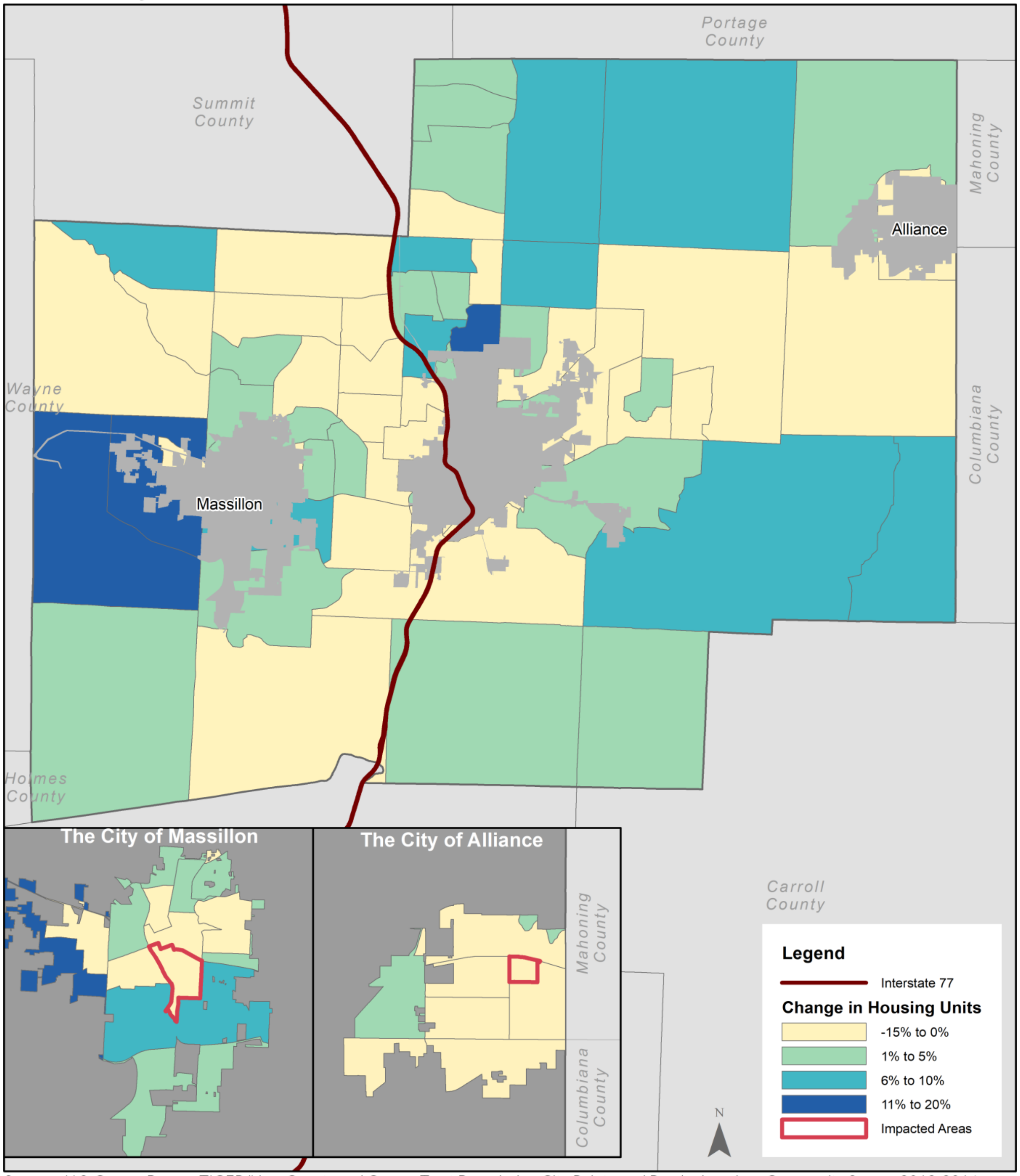
	2000		*2010*		*2016*	
	#	*%*	*#*	*%*	*#*	*%*
Stark County	157,079	100.0%	164,824	100.0%	165,524	100.0%
Urban County	98,367	62.6%	103,782	63.0%	104,807	63.3%
Alliance	9,696	6.2%	10,422	6.3%	9,851	6.0%
Canton	35,477	22.6%	35,952	21.8%	36,061	21.8%
Massillon	13,539	8.6%	14,668	8.9%	14,805	8.9%

Source: Census Bureau, Decennial Census, 2000; American Community Survey 2006- 2010, 2012 – 2016 (DP04)

This building trend is due to the declining population in the cities, while the Urban County experienced an increase. For example, Canton lost 9.6% of its population between 2000 and 2016 and the Urban County's population increased by 1.9%. The Urban County's housing stock consists of newer units built to meet rising demand as the population increases in the suburban areas outside of the urban centers. Unlike the Urban County, the cities have older stock that is in need of rehabilitation or replacement. These older units mean that the number of housing units in cities hide the quality and usability of that stock. Since 2016, there has been an aggressive movement to demolish much of the vacant and dilapidated housing in the urban centers.

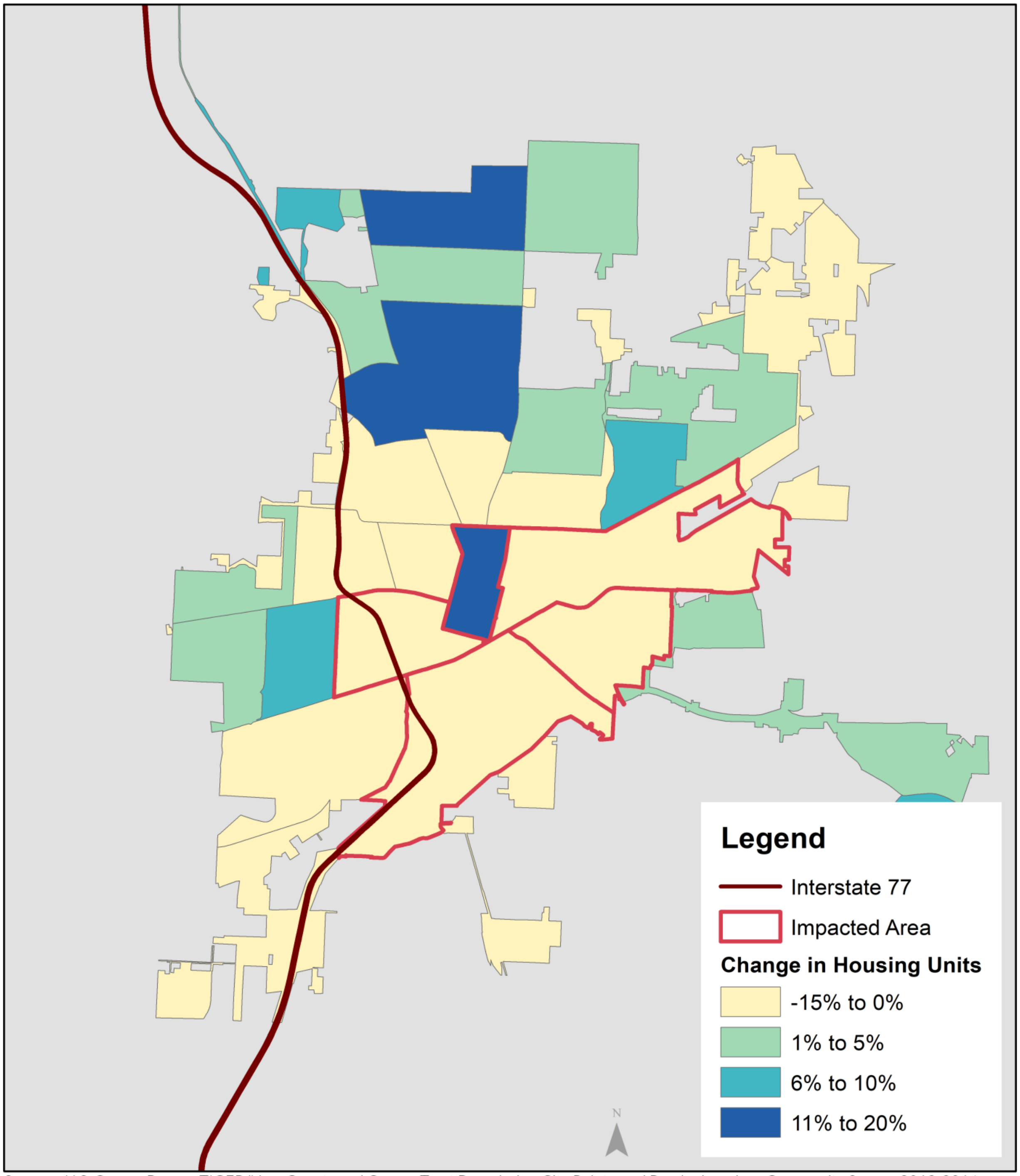
MAP 5: HOME CONSORTIUM CHANGE IN HOUSING UNITS, 2016

The cities of Alliance and Massillon join with Stark County to form the HOME Consortium, while the City of Canton is not a member.



Sources: U.S. Census Bureau TIGER/Line: County and Census Tract Boundaries, City Points, and Roads; American Community Survey, 2012-2016 5-Year Estimates: Race & Ethnicity, LMI, and Housing Data

MAP 5A: CITY OF CANTON CHANGE IN HOUSING UNITS, 2016



Sources: U.S. Census Bureau TIGER/Line: County and Census Tract Boundaries, City Points, and Roads; American Community Survey, 2012-2016; 5-Year Estimates: Race & Ethnicity, LMI, and Housing Data

The census tracts that are losing housing units also tend to be tracts that contain a population that is at least 51% low to moderate income. This is partially due to the removal of units through the Stark County Land Bank's Neighborhood Initiative Program (NIP), which aims to eliminate blight by demolishing vacant and dilapidated housing that is not up to code. These units were likely part of the county's affordable housing stock before becoming vacant and falling into disrepair.

The Urban County's share of housing stock increased.
This is likely due to population loss in the cities compared to the Urban County. The stock that remains in the urban centers also tends to be older and more likely in disrepair.

b) Types of Housing Units

Single-family housing units comprised 77.9% of all housing in the region – up from 76.6% in 2000 despite a population decline, which is an indicator of growth among smaller households. Single-family housing was also the fastest growing category of housing at 7.1% compared to a growth of only 0.9% in multi-family units. The Urban County has the majority of single-family units with 66.2% of the total stock in that category.

Figure 2-27 Number of Housing Units by Type, 2016

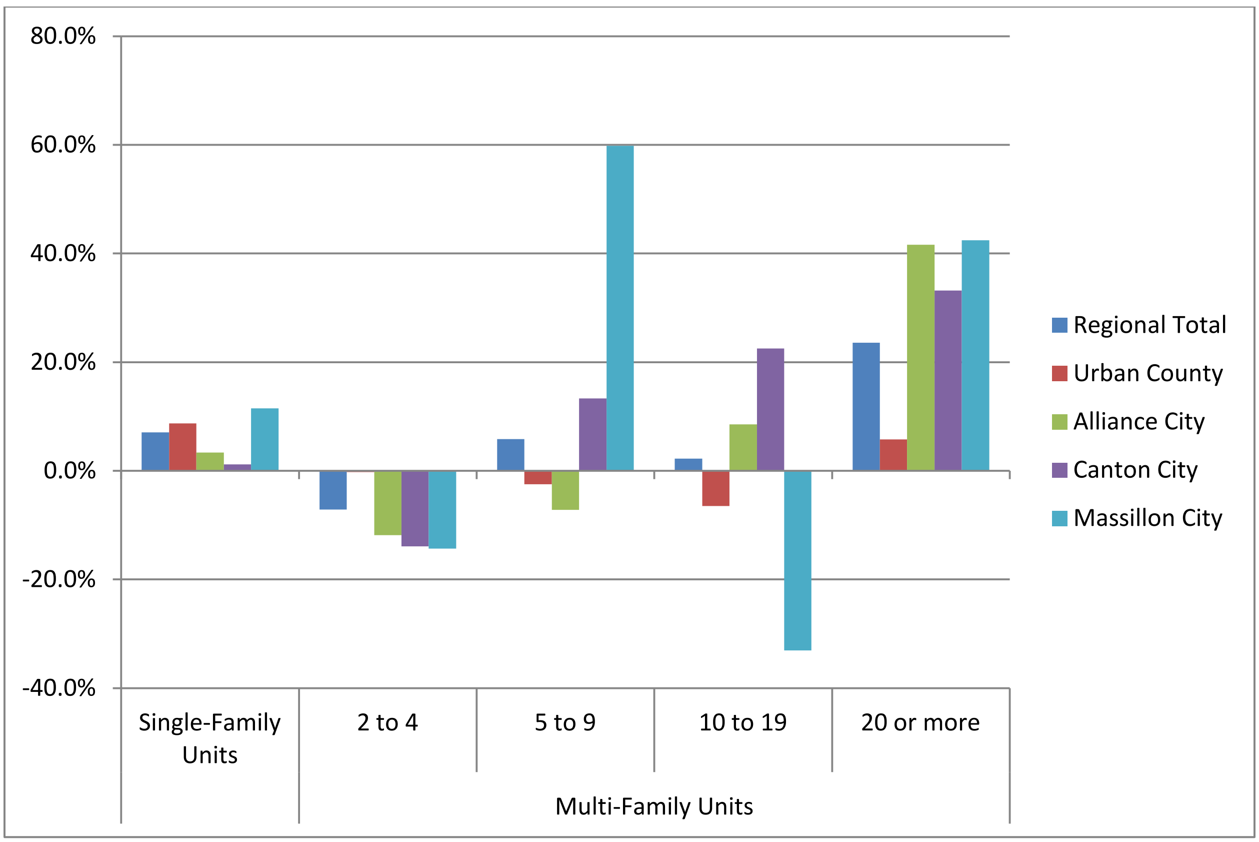
	Total Units	*Single-Family Units*	*Multi-Family Units*					*Mobile home*
			2 to 4	*5 to 9*	*10 to 19*	*20 or more*	*Total*	
Stark County	165,524	128,864	16,202	6,721	4,711	5,496	33,130	3,525
Urban County	121,150	85,323	8,466	3,742	2,212	1,928	16,348	3,131
Alliance	12,716	6,976	1,430	374	469	592	2,865	10
Canton	47,003	25,105	4,866	1,881	1,803	2,392	10,942	14
Massillon	17,780	11,460	1,440	724	227	584	2,975	370

Source: U.S. Census Bureau, American Community Survey 2012 – 2016 (DP04)

The three urban centers' housing stock is also majority single-family units, and all three areas have seen increases in this type of housing since 2000. Massillon had the largest proportional increase in total housing units at 9.4% with most of the growth occurring in the single-family category, however, multi-family units was the city's fastest growing category of housing. Canton had the lowest growth in total housing units at 1.6% with most of that growth occurring in multi-family units. Alliance's housing stock grew at a rate of 2% with multi-family housing consisting of 20 or more units being its fastest growing category. Multi-family units can be more affordable, and so an increase in multifamily housing spread across the major urban areas and the county could help provide expand housing choice for lower income households if it is appropriate.

Single-family housing units comprised 77.9% of all housing in the region.
It is also the fastest growing form of housing by a wide margin. Growing the County's multifamily housing stock will be essential in creating more quality affordable housing.

Figure 2-28 Percent Change in Housing Units by Type, 2000 - 2016



Source: U.S. Census Bureau, Census 2000 (SF3, H30), American Community Survey 2012 – 2016 (DP04)

c) Foreclosure Trends

Ohio was struck by the housing credit bubble hard, experiencing a rise in the number of foreclosures every year from 1995 until peaking in 2009 at nearly 90,000 foreclosures in a year. Housing foreclosures has since fallen by over half, sitting at about 40,000 in 2015.[3] Stark County had 5,496 foreclosures in 2008 and a foreclosure rate of 8.1%. Canton had the highest foreclosure rate at 12.3%, while the Urban

[3] Woodrum, Amanda and Granados, Diana (November 2016). "Ohio Foreclosures 2016: Damage in the wake of the housing crisis." Policy Matters Ohio.

County had the lowest with a rate of only 6.3%.[4] Foreclosures in Stark County have followed a similar trend as Ohio, falling steadily to only 1,081 in 2015 – down 80% from 2008.[5] The most recent data available from June 2018 shows that Stark County has a slightly higher foreclosure rate than the entire state of Ohio.

Figure 2-29 Ranking of Stark County's Urban Centers by Highest Foreclosure Rate, June 2018

	Foreclosure Rate
Ohio	1 in every 1,410 Mortgages
Stark County	1 in every 1,437 mortgages
1. Massillon	1 in every 1,302 mortgages
2. Canton	1 in every 1,411 mortgages
3. Alliance	1 in every 2,172 mortgages

Source: RealtyTrac: Accessed online <https://www.realtytrac.com/statsandtrends/foreclosuretrends/oh/stark-county>

Foreclosures are more likely to occur among householders with lower incomes and less stable employment opportunities, which tend to be members of the protected classes. Foreclosures also impact the availability and price of future credit for those that are impacted, making it even more difficult to build wealth and lowering the probability of becoming a homeowner. Statistical research has found that mortgage defaults are more frequent in neighborhoods with higher minority concentrations, [6] which means the negative effects of higher foreclosures rates will fall more heavily on communities of color that already have disproportionately lower rates of homeownership.

The number of foreclosures in Stark County has stabilized since the financial crisis in 2008.

By 2015 there were only 1,081 foreclosures in Stark County – down 80% from 2008. Foreclosures are more likely to impact minority households due to their lower incomes and less stable employment opportunities, and so should still be monitored closely despite a sharp drop.

[4] HUD NSP Foreclosure Estimates, 2008

[5] Woodrum, Amanda & Granados, Diana (November 2016). "Ohio Foreclosures 2016: Damage in the wake of the housing crisis." Policy Matters Ohio.

[6] Pedersen, C. & Delgadillo, L. (2007). Residential Mortgage Default in Low- and High-Minority Census Tracts. *Family and Consumer Sciences Research Journal.*

d) Protected Class Status and Homeownership

In Stark County, the overall homeownership rate is 69%, however, 71.9% of White households own the home they live in compared to only 36.4% of Black households (Asian and Hispanic estimates have high margins of error and may not be accurate). The rate of homeownership is much higher in the Urban County, even among Blacks, though they still lag far behind Whites. One of the primary factors affecting homeownership rates for minorities is lower incomes compared to White households. Without either higher incomes or more affordable housing options available for purchase, it is unlikely that homeownership rates for minorities will increase significantly.

Figure 2-30 Proportion of Owner Occupied Housing Units by Race, 2016

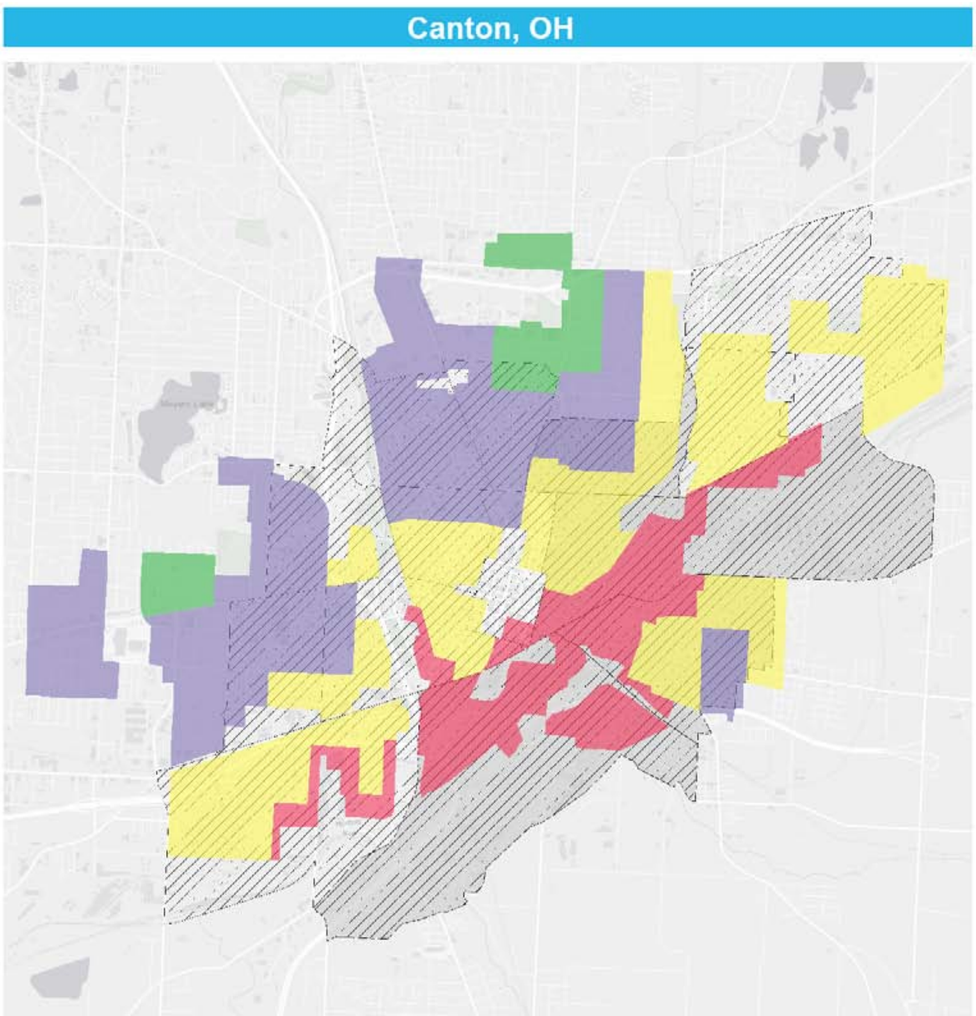
	Total Owner Occupied Units	*White*		*Black*		*Asian*		*Hispanic*	
		#	*%*	*#*	*%*	*#*	*%*	*#*	*%*
Stark County	103,854	98,131	71.9%	4,084	36.4%	626	75.3%	883	45.2%
Urban County	76,081	73,794	77.6%	1,133	54.8%	496	79.5%	561	59.0%
Alliance	4,470	4,102	55.0%	322	32.8%	7	19.4%	24	25.0%
Canton	15,013	12,413	56.2%	2,222	30.7%	72	64.3%	282	38.4%
Massillon	8,290	7,822	65.3%	407	43.1%	51	86.4%	16	9.3%

Source: U.S. Census Bureau, American Community Survey 2012 -2016 (DP04, B25003A, B25003B, B25003D, B25003I)
Note: Asian and Hispanic estimates have high margins of error, which prevents accurate estimates of these households.

The legacy of redlining is still visible in Stark County—as it is across the country—in the differences in homeownership rates between the White and Black populations. Redlining was the practice in the mid twentieth century by the federal government and banks that directed investment away from predominantly African American neighborhoods. The practice gets its name from the red pen used to outline neighborhoods on city maps that were most eligible to receive investment.

The National Community Reinvestment Coalition has developed maps for cities across the country showing where the old redlined districts (red and yellow filled areas) were located along with current areas of concentrated minorities and low to moderate income households (mesh filled areas). Currently, only Canton is available for analysis. In Canton, there is significant overlap between the two. Almost all areas currently consisting of racial and poverty concentrations were previously redlined from investment. It is unlikely a coincidence that these areas also tend to have the oldest housing stock and lower rates of homeownership.

The Black homeownership rate is 36.4%.
This is far below the homeownership rate for Whites, which stands at 71.9%. White households in the Urban County also own their homes at higher rates than the urban centers by over 10 percentage points each.



www.ncrc.org • 202-628-8866

HISTORIC
HOLC Grades 1930-1940

- A = "Best"
- B = "Still Desirable"
- C = "Definitely Declining"
- D = "Hazardous"

CURRENT

- White Majority MUI
- Median family income is less than 80% of the area average (LMI)
- Minority Population over 50% 2010
- LMI and Minority Population over 50%

HOLC GRADING AND AREA INCOME

The Home Owner's Loan Corporation (HOLC) identified neighborhoods by four categories/colors. The green areas were "Best", while the red areas were "Hazardous". Today, 74% of the "Hazardous" areas remain low-to-moderate income (LMI) nationally, while "Best" areas are 94% middle-to-upper income (MUI). Here is the ranking for the city of Canton, OH:

Grades/Income	LMI	MUI
A Best	10.99%	89.01%
B Desirable	54.28%	45.72%
C Declining	87.96%	12.04%
D Hazardous	100.00%	0.00%

HOLC GRADING AND RACE/ETHNICITY

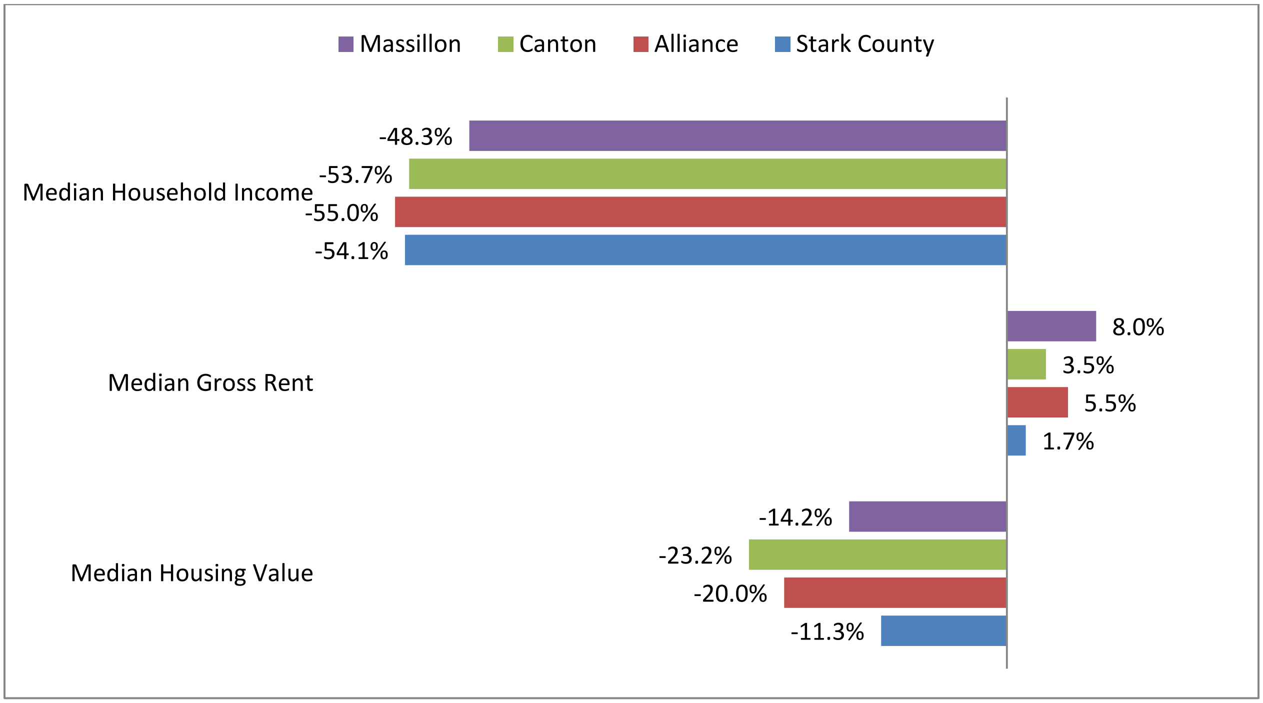
HOLC examiners also graded neighborhoods by their racial/ethnic composition. The presence of minority communities resulted in downgrading under their system. 64% of the communities identified as "Hazardous" by the HOLC in the 1930's have majority-minority populations in the 2010 Census.
Here is the ranking for the city of Canton, OH:

Grades/Minority	White	Minority
A Best	100.00%	0.00%
B Desirable	91.07%	8.93%
C Declining	75.98%	24.02%
D Hazardous	19.55%	80.45%

e) Value and Cost of Housing

Housing values in Stark County have yet to recover from the plunge in prices during the recession. Adjusting for inflation, the median housing value fell 11.3% since 2000. This is likely because the county's population loss and economic stagnation have led to lower demand in the housing sales market. Rising rents in the face of stagnating wages will also make it harder for most households to save enough for a down payment to qualify for a mortgage.

Figure 2-31 Percent Change in Inflation Adjusted Median Household Income, Median Gross Rent, and Median Housing Value 2000 - 2016



Source: U.S. Census Bureau 2000 Census (SF3-76, H63, P53), American Community Survey 2006 - 2010 & 2012 - 2016 (B25077, B25064, B0611)

The median gross rent in the region has been rising, though at higher rates in the cities than the Urban County. Falling incomes and rising rents will lead to a decrease in affordable housing choice even as housing values fall. This increases the cost burden on low-income households that will prevent them from becoming homeowners and accumulating wealth – a burden that falls heavily on protected classes like minorities, single mothers, and persons with disabilities.

Figure 2-32 Number of Rental Units by Cost of Rent in 2016 and Percent Change from 2010

Monthly Rent	Stark County		Urban County		Alliance		Canton		Massillon	
	#	%	#	%	#	%	#	%	#	%
Less than $500	9,451	-22.6%	2,229	-37.9%	976	-37.2%	5,261	-7.9%	985	-27.7%
$500 - 699	13,976	2.4%	7,100	-4.1%	1,296	-2.6%	4,115	12.9%	1,465	14.7%
$700 to $999	16,769	38.0%	9,262	23.4%	1,401	55.5%	4,443	61.9%	1,663	66.6%
$1000 or more	5,037	39.4%	3,198	40.3%	190	-22.8%	1,270	64.5%	379	19.9%
Total	45,233	8.7%	21,789	4.9%	3,863	-4.2%	15,089	17.2%	4,492	13.6%

Source: U.S. Census Bureau, 2012 - 2016 American Community Survey (B25063)

These factors are leading to fewer rental units within reach, especially for lower income protected classes, even though the number of units has increased by 8.7% since 2010. Affordable housing is defined as paying no more than 30% of gross income on monthly housing expenses.[7] The median household income for Blacks in Stark County was $26,843 in 2016 (see Figure 2-6), which means that half of Black households can only afford monthly housing expenses (rent, utilities, etc.) of $671 per month. The number of rental units in Stark County that cost $699 or less per month has declined by 9.4% since 2010.

Figure 2-33 Percent Change in Number of Rental Units Affordable to Black Households, 2010 - 2016

	Stark County	Urban County	Alliance	Canton	Massillon
Percent Change in Rental Units Affordable to Black Households at 30% of MHI	-9.4%	-15.1%	-21.2%	0.2%	-7.2%

Source: U.S. Census Bureau, 2006 – 2010 & 2012 – 2016 American Community Survey (B25063)

Adjusting for inflation, the median housing value fell 11.3% since 2000.

Meanwhile, rents have increased by 1.7% countywide, while the real median income has fallen by 11.3%. These factors have led to a 9.4% reduction in the number of affordable housing units for Black households at 30% of the area median household income.

[7] HUD defines housing problems as (1) cost burden of 30% or more (i.e. paying more than 30% of gross income on monthly housing expenses), and/or (2) lacking complete kitchen or plumbing facilities, and/or (3) overcrowding of more than 1.01 persons per room.

f) Families and Housing Choice

Affordable Housing is an issue that is generally more acute for families with children. Families with children need to cover expenses related to childcare and generally larger units. HUD defines overcrowding as housing more than 1 persons-per-room. Minority families tend to be larger than White families, so they are more likely to be affected by these financial constraints.

Figure 2-34 Families with Three or More Persons in Stark County, 2010

Race	*Percent of families with 3 or more persons*
White	52.7%
Black	63.1%
Asian	62.9%
Some Other Race Alone	78.0%
Two or More Races	67.1%
Hispanic	66.2%

Source: U.S. Census Bureau, Census 2010 (SF1, P28B, P28D, P28F, P28G, P28H, P28I)

Minority families, on average, require larger housing units and have lower incomes than White families, which makes it more difficult for minorities to avoid overcrowding. The median household income for a Black household in Stark County is $26,843.[8] This income is too low to afford the average two-bedroom housing unit even though 63.1% of Black families have at least 3 persons.

Figure 2-35 Annual Income Required to Afford Housing By Bedroom Size in Stark County

	Annual Income
Zero-Bedroom	$18,920
One-Bedroom	$21,560
Two-Bedroom	$28,680
Three-Bedroom	$36,640
Four-Bedroom	$39,080

Source: National Low Income Housing Coalition

In order to find affordable housing that has enough space for their families many households will have to turn to suboptimal housing units—those that are old and in need of repair. The majority of households under 50% of the median family income have housing problems in Stark County, and half of all Black and Hispanic families in the county have housing problems.

[8] The National Low Income Housing Coalition "Out of Reach 2018: Ohio." <http://nlihc.org/oor/ohio> Note: this is an excellent resource that provides detailed explanations for how calculations are made.

Figure 2-36 Percent of Households with Housing Problems as Percentage of Median Family Income by Race, 2015

	< 50% MFI		50-80% MFI		80-100% MFI		>100% MFI		Total	
	Rent	Own	Rent	Own	Rent	Own	Rent	Own	Rent	Own
White	81.3%	64.0%	34.8%	33.3%	6.7%	20.5%	3.6%	3.8%	43.2%	17.8%
Black	73.0%	77.8%	35.0%	38.6%	2.7%	32.5%	1.9%	3.3%	50.2%	30.3%
Hispanic	94.5%	100%	21.4%	56.3%	0.0%	32.0%	0.0%	8.5%	52.0%	29.4%

Source: HUD Comprehensive Housing Affordability Strategy 2011 – 2015

The supply of larger housing units favors owners over renters in Stark County with just over a third of renter occupied units having three or more bedrooms for renters compared to 82.5% for owners. Because minority families tend to be larger, but less likely to own a home, they are limited in their housing options to the available rental units that meet their needs.

On average, minority families have larger families and lower incomes than White families.
This makes it more difficult for minority families to find housing that suits their needs and does not leave them cost burdened. There also tends to be fewer housing units that are large enough to suit these families in the rental market.

Figure 2-37 Proportion of Owner Versus Renter Occupied Housing, 2016

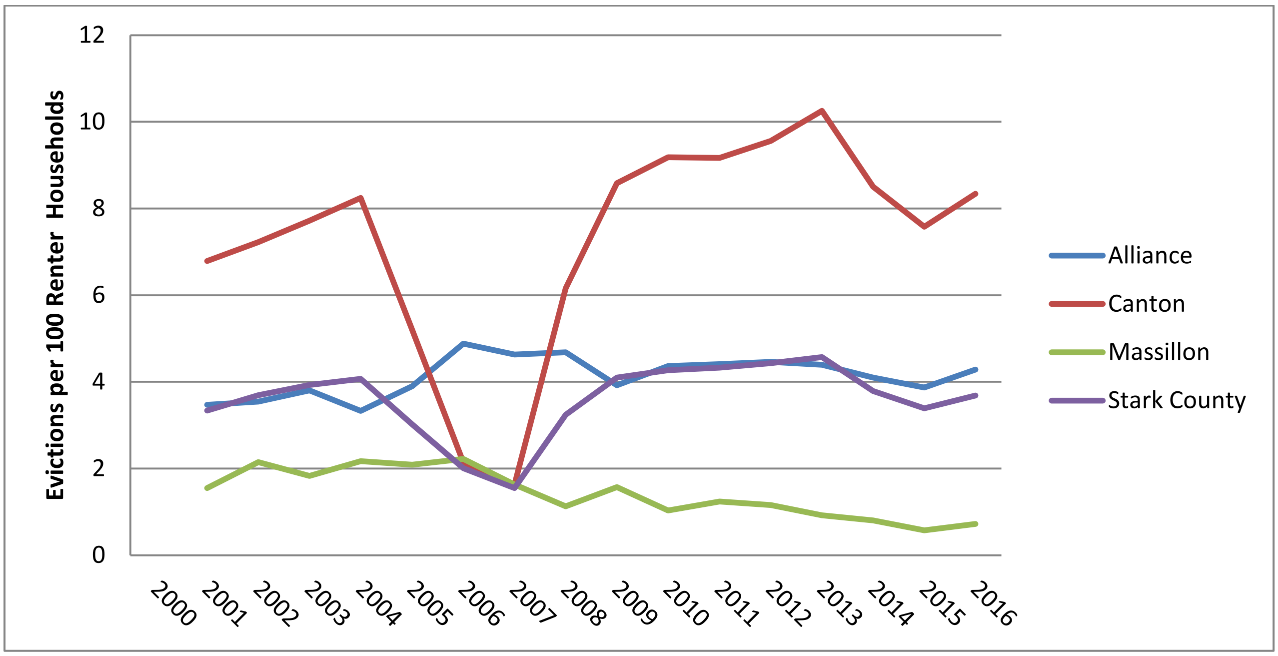
	Owner-occupied Housing									
	Stark County		Urban County		Alliance		Canton		Massillon	
	#	%	#	%	#	%	#	%	#	%
Total	**103,854**	**100.0%**	**76,081**	**100.0%**	**4,470**	**100.0%**	**15,013**	**100.0%**	**8,290**	**100.0%**
No bedroom	118	0.1%	95	0.1%	8	0.2%	15	0.1%	-	0.0%
1-2 bedrooms	18,071	17.4%	11,592	15.2%	1,207	27.0%	3,414	22.7%	1,858	22.4%
3+ bedrooms	85,665	82.5%	64,394	84.6%	3,255	72.8%	11,584	77.2%	6,432	77.6%
	Renter-occupied Housing									
	Stark County		Urban County		Alliance		Canton		Massillon	
	#	%	#	%	#	%	#	%	#	%
Total	**47,247**	**100.0%**	**22,872**	**100.0%**	**4,111**	**100.0%**	**15,529**	**100.0%**	**4,735**	**100.0%**
No bedroom	1,296	2.7%	440	1.9%	41	1.0%	712	4.6%	103	2.2%
1-2 bedrooms	29,870	63.2%	15,386	67.3%	2,484	60.4%	8,961	57.7%	3,039	64.2%
3+ bedrooms	16,081	34.0%	7,046	30.8%	1,586	38.6%	5,856	37.7%	1,593	33.6%

Source: Census Bureau, American Community Survey 2012 – 2016 (B25042)

g) Limited Choice and Eviction

With rising rents, stagnant or falling wages, and limited housing options, households in Stark County can face eviction. Except for a short period from 2005 to 2007, Canton has the highest rate of evictions per 100 renter households. Canton's eviction rate is the 33rd highest among midsized cities in the country and 2nd highest in Ohio for 2016.[9] Evictions are often a symptom of the larger problem that low-income households lack housing options. Evictions are often sought by landlords due to problems, such as nonpayment of rent, unemployment and low or inconsistent income, which are more prevalent in lower income households including minorities, the disabled, and single-mothers with children.

Figure 2-38 Evictions in Stark County, 2000 - 2016



Source: www.evictionlab.org

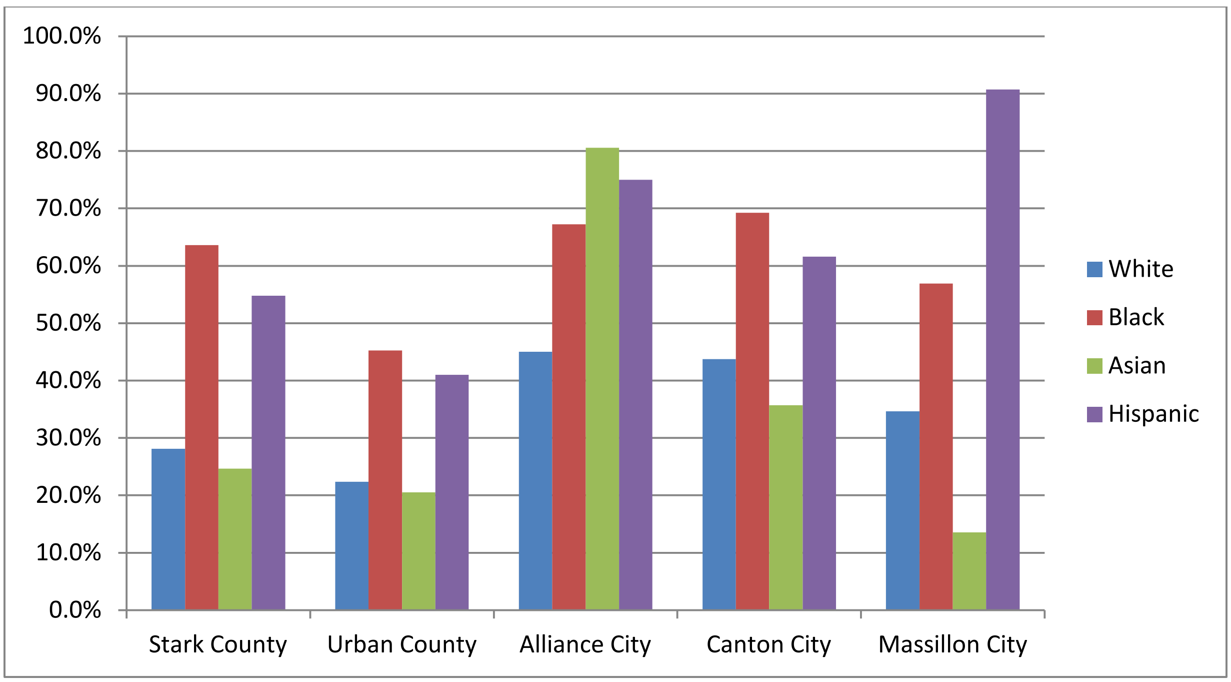
Evictions, unlike other financial related hardships such as bankruptcy, are never expunged from an individual's record. All it takes is one eviction and an individual's housing options are potentially limited for the rest of their life. Since minorities and single parent households with children tend to rent housing in greater proportions, they are at greater risk of fluctuating rental markets and therefore also evictions. A lack of affordable rental housing will push up eviction rates, which can impact them financially as more residents with evictions find it nearly impossible to access adequate housing and the benefits that come with it.

9 At a rate of 8.34 this translates to 3.32 households evicted every day.

Canton's eviction rate is the 33rd highest among midsized cities in the country and 2nd highest in Ohio for 2016.

Rising rents and falling wages will continue to cause more evictions in Stark County. These conditions disproportionately impact minority households and female-headed households with children, and can have financial implications that last a lifetime.

Figure 2-39 Percent of each Race and Ethnicity that are Renters, 2016



Source U.S. Census Bureau, American Community Survey 2012 -2016 (DP04, B25003A, B25003B, B25003D, B25003I)

h) Housing Sales Market

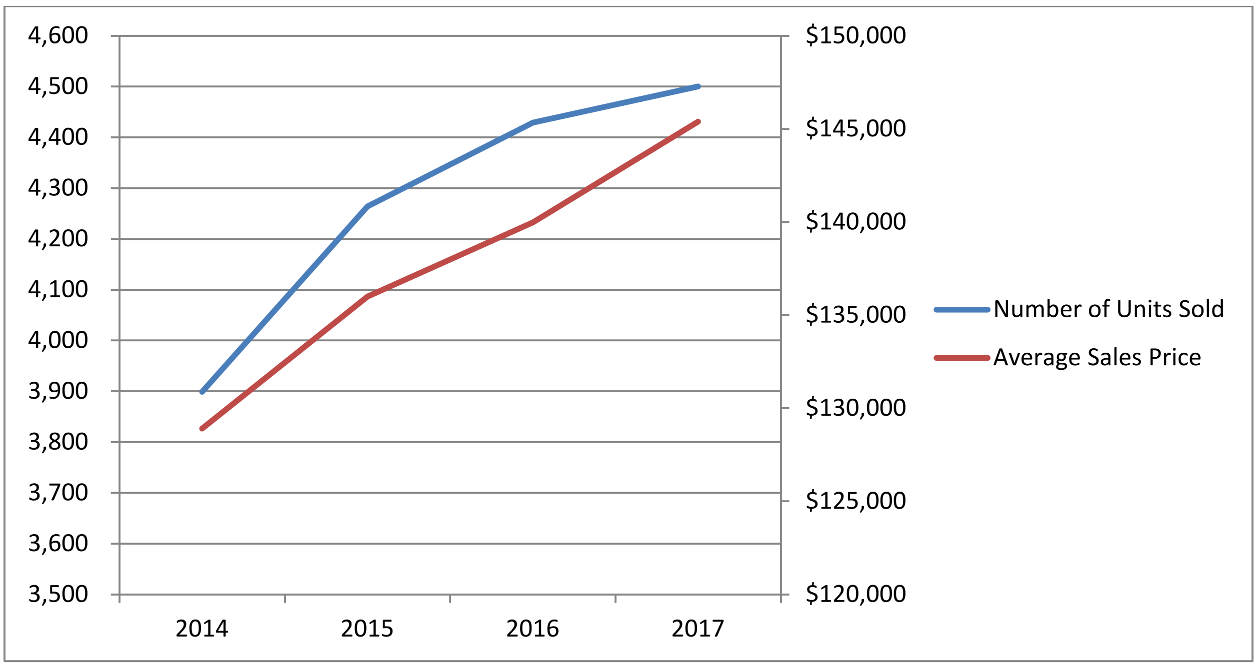
The Stark County Association of Realtors compiles and distributes sales trend data for all of Stark County. An analysis of data from 2014 – 2017 reveals that the housing market has recovered in some aspects from the crash in 2008. The number of units sold in 2017 has almost reached the peak of 4,653 units sold in 2005, however, prices have not yet recovered. The inflation adjusted (in 2017 dollars) average sales price in 2005 was $160,062 compared to only $145,385 in 2017 – a 10% difference. Both average number of days on the market and average sales price as a percentage of average list price have recovered. In 2008, the average number of days on the market peaked at 102 days, more than a month longer than in 2017, while in 2009 the sales-to-list-price ratio was down to 84% compared to 94.7% in 2017.

Figure 2-40 Housing Market Sales Trends 2014 - 2017

Single-Family Properties	*2014*	*2015*	*2016*	*2017*
Number of Units Sold	3,899	4,264	4,429	4,500
Average No. Days on Market	77	77	76	68
Average Sales Price	$128,901	$136,001	$139,975	$145,385
ASP as % ALP	92.4%	93.3%	93.8%	94.7%

Source: Stark County Association of Realtors

Figure 2-41 Number of Housing Units Sold and Average Sales Price 2014 – 2017



One measure of affordability of an area's housing stock is to compare the value of the typical house to the maximum purchase price a typical household can afford. The table below breaks down the typical costs associated with a mortgage and uses that information to determine the maximum mortgage amount a household can afford without devoting more than 30% of its monthly income towards a mortgage payment using 2016 data. This is compared to the median home value for each area to determine if the typical household can purchase more or less than the typical house.

Figure 2-42 Maximum Affordability of Home Purchase

	Median Household Income 2016	Monthly Mortgage Payment: Mortgage Principal & Interest	Real Estate Taxes	Homeowner's Insurance	PMI	Total Allowable PITI Payment (30% gross income)	Maximum Affordable Purchase Price	Median Housing Value 2016
Stark County	$48,714	$755	$283	$65	$115	$1,218	$183,477	$124,000
Whites	$51,192	$796	$298	$65	$121	$1,280	$193,332	
Blacks	$26,843	$397	$149	$65	$60	$671	$96,495	
Alliance City	$32,058	$502	$159	$65	$76	$801	$121,842	$79,600
Whites	$33,267	$522	$166	$65	$79	$832	$126,839	
Blacks	$24,110	$366	$116	$65	$56	$603	$88,990	
Canton City	$30,444	$447	$181	$65	$68	$761	$108,669	$71,000
Whites	$33,668	$499	$202	$65	$76	$842	$121,243	
Blacks	$23,863	$342	$138	$65	$52	$597	$83,003	
Masillon City	$42,808	$659	$246	$65	$100	$1,070	$160,098	$98,700
Whites	$44,718	$690	$258	$65	$105	$1,118	$167,699	
Blacks	$27,929	$415	$155	$65	$63	$698	$100,883	

Source: U.S. Census Bureau, 2012 - 2016 American Community Survey (DP03, B25077), https://www.insurance.com/ohio-homeowners-insurance, https://www.bankrate.com/finance/mortgages/the-basics-of-private-mortgage-insurance-pmi.aspx, http://www.freddiemac.com/pmms/pmms30.html, additional calculations by Mullin & Lonergan Associates.

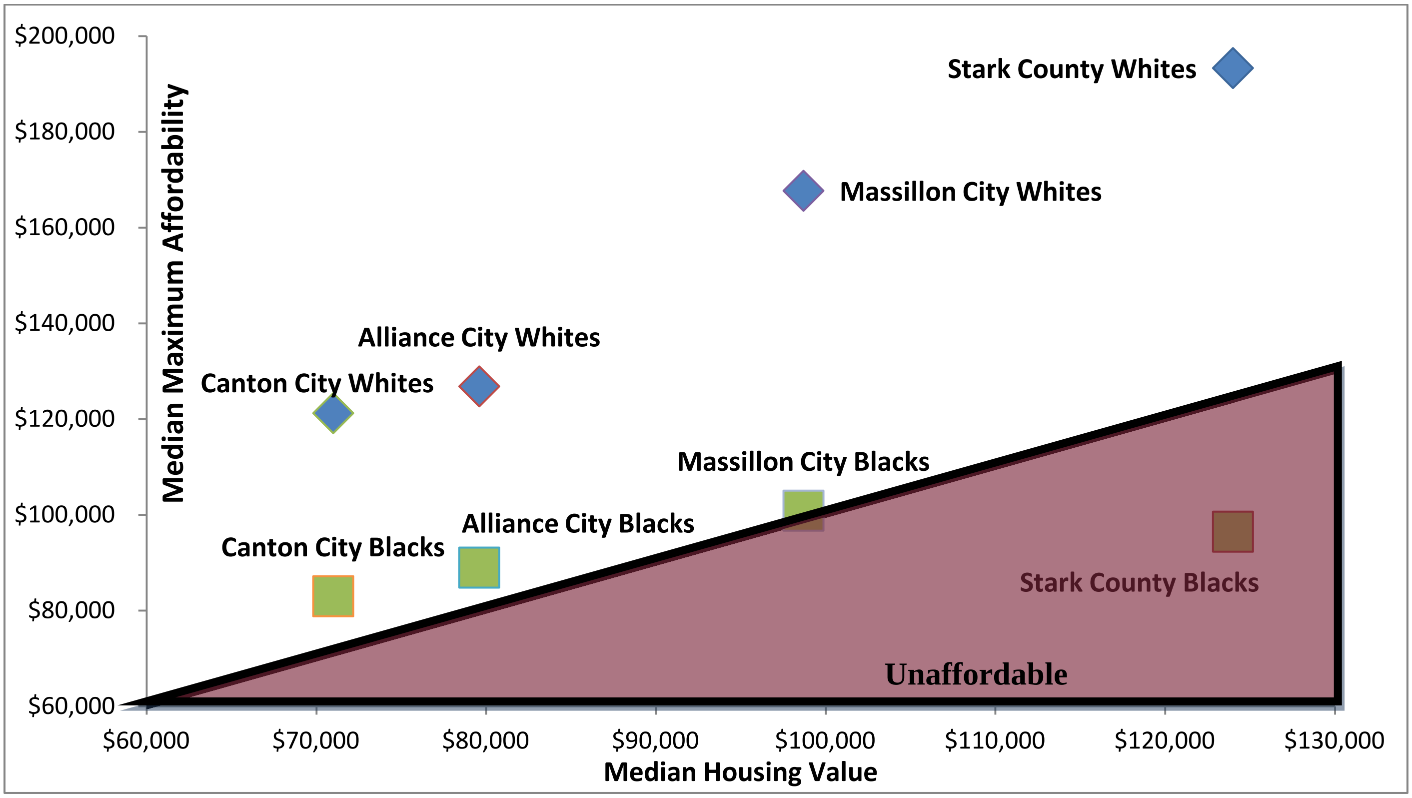
In Stark County, the typical household can afford 148% of the price of the typical house in Stark County. For example, a typical house in Stark County is valued at $124,000, and the typical family can afford a house that costs $183,477. This means that Stark County has an affordable housing market. However, this changes drastically when broken down by race. The typical Black household can only afford 77.8% of the price of the typical house in Stark County compared to the typical White household that can afford 155.9% of the price of the typical home. Differences in affordability change based on location, but there is still a wide gulf between what is affordable for White households compared to Black households. In Canton, where the typical Black household can afford 116.9% of the price of the typical house, Whites can still afford to a home price over 50% more than what Blacks can afford.

The graph below presents a clearer picture of affordability between races. The x-axis is the median household value and the y-axis is the median household income. The black diagonal line of the red triangle represents where median house value and median household income meet. For any group exactly on this line, half of households can afford to buy half of houses where they live. Anyone below the line in the red triangle cannot afford the median house where they live, while anyone above can afford more than the median home. In other words, groups above the line can afford to buy over half of houses in their area, while those below the line can only afford less than half. The farther away from the line the more pronounced the effect. Blue diamonds represent the median White household and are clustered above the line, while Black households represented by green boxes are clustered at or below the line.[10]

---

[10] Maximum affordable purchase price was found using the following assumptions: A 30 year loan with a 10% down payment. Monthly homeowner insurance payment was calculated using the average homeowner insurance amount in Akron, OH as

Figure 2-43 Housing Purchase Affordability



Any inferences must also consider that this analysis precludes any additional debts like car or student loan payments. These types of debts will drive down the maximum affordability for an individual. They also make up a larger share of a household's debt and will have a larger impact on what they can afford. The analysis assumes a 10% down payment, which is more difficult for lower income households to save. Because Blacks in Stark County are overrepresented in low-income households, they are more likely to rent. Rents have been rising even as inflation adjusted wages fall, leaving renters to pay larger shares of their income to rent, preventing them from saving for that 10% down payment. Other items like vehicles which are needed to get to work, or student loans which are needed to get the education required to achieve a higher wage, are taking larger shares of household income, which is an additional barrier to finding affordable housing in a location that can best suit a household's needs.

---

calculated by Insurance.com. Real estate taxes were calculated using the average millage rate across the three urban centers of Stark County applied to 35% of the purchase price of the home (more information on Stark County real estate taxes can be found at Treasurer's website http://www.starkcountyohio.gov/treasurer). Mortgage insurance rates were found at Bankrate.com. Typically rates vary between 0.3% to 1.5% of the mortgage amount. A rate of 0.75% was used because it is half of the top rate and likely captures the typical consumer. Other liabilities like monthly payments on a car loan were not used as they are outside the scope of this analysis; however, the size of these monthly payments could drastically alter the results, and should be considered when reviewing this analysis.

The housing market has largely recovered in some aspects since the market crashed in 2008.

Affordability varies greatly across race, however. The typical Black family can only afford 77.8% of the typical house in Stark County, while the typical White family can afford 155.9% of the typical house.

3. Review of Public and Private Sector Policies

A. Public Sector Policies

The AI is a review of impediments to fair housing choice in the public and private sector. Impediments to fair housing choice are any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status or national origin that restrict housing choices or the availability of housing choices on the basis of race, color, religion, sex, disability , familial status, or national origin. Policies, practices, or procedures that appear neutral on their face but which operate to deny or adversely affect the provision of housing to persons of a particular race, color, religion, sex, disability, familial status, or national origin may constitute such impediments.

An important element of the AI includes an examination of public policy in terms of its impact on housing choice. This section evaluates the public policies in the three cities and Stark County to determine opportunities for furthering the expansion of fair housing choice. Below is a brief description of important policy elements and how they relate to fair housing followed by a profile of each of the three cities and Stark County. The policy profiles also describe the progress in eliminating impediments to fair housing that were put forward in the last AI, and finally provides comments and recommendations to further fair housing.

a) Policies Governing Investment of Federal Entitlement Funds

The allocation of staff and financial resources is an important tool for policy makers seeking to affect housing choice. Directing these resources to the right programs will be essential in determining the success of fair housing policy and the continuation of funds from HUD. It is important to balance a combination of initiatives both inside and outside impacted areas (areas with concentrations of minority persons and LMI persons) are required.

- Community Development Block Grant (CDBG): The primary objective of this program is to develop viable urban communities by providing decent housing, a suitable living environment, and economic opportunities, principally for persons of low and moderate income levels. Funds can be used for a wide array of activities, including: housing rehabilitation, homeownership assistance, lead-based paint detection and removal, construction or rehabilitation of public facilities and infrastructure, removal of architectural barriers, public services, rehabilitation of commercial or industrial buildings, and loans or grants to businesses.

- HOME Investment Partnerships Program (HOME): The HOME program provides federal funds for the development and rehabilitation of affordable rental and ownership housing for low and moderate income households. HOME funds can be used for activities that promote affordable rental housing and homeownership by low and moderate income households, including reconstruction, moderate or substantial rehabilitation, homebuyer assistance, and tenant-based rental assistance.

The system of entitlement fund administration in Stark County varies by funding source. The cities of Alliance, Canton and Massillon are each CDBG entitlements and directly receive, manage and account for funds received through that program. Urban Stark County, as an entitlement jurisdiction, manages CDBG funds for areas of the County outside those three cities. In the HOME program, Canton is its own participating jurisdiction, while Alliance and Massillon receive funding through the Stark County HOME Consortium. Canton and Stark County were direct federal Neighborhood Stabilization Program (NSP) recipients, while Massillon administered an NSP program with competitive funding through the State of Ohio. This program is now closed. None of these programs are administered in the Village of Hills and Dales, which has elected to opt out of the Urban County.

The Board of Stark County Commissioners is responsible for federal entitlement programs administered by the County. The Board contracts with the Stark County Regional Planning Commission (SCRPC) to handle planning and administration related to these programs. SCRPC compiles the Five-Year Consolidated Plan, which establishes policies and priorities to govern entitlement spending. The Stark County Consortium Consolidated Plan was last updated for FY 2014 – 2018.

Major housing priorities for FY 2014 – 2018, as described in the Consolidated Plan, include:

- Preservation of affordable housing, including targeting elderly for owner-occupied rehabilitation.
- Provision of rapid re-housing for those at risk of becoming homeless and to assist homeless populations.
- Provision of rental assistance to increase affordability to low- and moderate-income persons

The County is completing its FY2019 – 2023 Consolidated Plan.

As a member of the Stark County HOME Consortium, each grantee accounts for its CDBG funds in its Five-Year Consolidated Plan and annual plans. HOME funds for Alliance and Massillon are administered by the Stark County Regional Planning Commission (SCRPC) and also accounted for in the Consolidated Plan.

b) Affirmative Marketing Policy

Recipients of HOME funds are required to adopt affirmative marketing procedures and requirements for HOME-assisted housing with five or more units. Such a plan should include:

- Methods of informing the public, owners, and potential tenants about fair housing laws and the local policies.
- A description of what the owners and/or the City or County will do to affirmatively market these units to those least likely to apply.
- Maintenance of records to document actions taken to affirmatively market HOME-assisted units and to assess marketing effectiveness.
- A description of how efforts will be assessed and what corrective actions will be taken where requirements are not met.

c) Site and Neighborhood Selection

Recipients of HOME funds are required to administer their program in compliance with the regulations found at 24 CFR 983.6(b), known as the Site and Neighborhood Standards. These standards address the site location requirements for newly constructed rental units financed with HOME funds. Site selection for HOME-assisted construction of new rental units must comply with several standards, including among other things, promoting greater choice of housing opportunities and avoiding undue concentration of assisted persons in areas containing a high concentration of LMI persons. With few exceptions, site selection must include a location that is not in an area of minority concentration. The Stark County Regional Planning Commission and the City of Canton are ultimately responsible for ensuring that HOME-assisted units in their jurisdictions are not unduly concentrated in impacted areas.

d) Appointed Boards and Commissions

A community's sensitivity to fair housing issues is often determined by people in positions of public leadership. The perception of housing needs and the intensity of a community's commitment to housing related goals and objectives are often measured by board members, directorships, and the extent to which these individuals relate within an organized framework of agencies, groups, and individuals involved in housing matters. The expansion of fair housing choice requires a team effort and public leadership and commitment is a prerequisite to strategic action.

e) Accessibility

From a regulatory standpoint, local government measures define the range and density of housing resources that can be introduced in a community. Housing quality standards are enforced through the local building code and inspections procedures. Many communities rely on the Ohio Building Code and the Residential Building of Ohio for their regulations governing construction standards. These standards will determine accessibility and quality of life for residents with disabilities. Per the Ohio Building Code, accessibility standards for units are based on the ADA Accessibility Guidelines.

f) Language Access Plan for Persons with Limited English Proficiency

Recipients of HUD funds must adhere to provisions in Title VI of the Civil Rights Act, which are meant to protect individuals from discrimination based on their race, color, or national origin. Persons with

Limited English Proficiency (LEP) are protected under the national origin aspect of Title VI. Grantees can ensure they are in compliance by following HUD's "safe harbor" guidelines for translation services. According to HUD, following safe harbor guidelines show that a community is undertaking efforts to comply with requirements for needed translation of vital materials. The HUD guidelines for translation of written vital documents are:

- 1,000 or more in the eligible population in the market area or among current beneficiaries
- More than 5% of the eligible population or beneficiaries *and* more than 50 in number.

Safe harbor guidelines for translated written notice of right to receive free oral interpretation of documents are:

- More than 5% of the eligible population or beneficiaries *and* 50 or less in number

g) Zoning

In Ohio, the power behind land development decisions resides with municipal governments and townships through the formulation and administration of local controls. These include zoning ordinances and subdivision ordinances, as well as building and occupancy permits. Generally speaking, the older a zoning ordinance, the less effective it will be. Older zoning ordinances have not evolved to address changing land uses, lifestyles and demographics. However, the age of the zoning ordinance does not necessarily mean that the regulations impede housing choice by members of the protected classes.

h) Comprehensive Plan

A community's comprehensive plan is a statement of policies relative to new development and preservation of existing assets. In particular, the land use element of the comprehensive plan defines the location, type and character of future development. The housing element of the comprehensive plan expresses the preferred density and intensity of residential neighborhoods within a community. Taken together, the land use and housing elements of the comprehensive plan define a vision of the type of community that they wish to become.

i) Policy Profiles

i) Stark County

Overview
CDBG – $1,330,930 FY18
HOME – $580,539 FY18

Stark County used no more than 20% of its funds for administrative activities and spent over 70% of its funds for activities that benefited low- and moderate-income persons throughout the Urban County. It allocated 6.9% of its total HOME funds to Alliance impact areas and 5.6% to Massillon impact areas. The rest of available funds were distributed to impact areas throughout the County. The Stark County HOME Consortium received $820,550 in FY '18. This funding was shared with the City of Alliance which received $116,928 of the funding. The City of Massillon received $123,083 of the funding. The balance of HOME Consortium funding, $580,539, will be utilized by Stark County for eligible HOME projects and administration.

Affirmative Marketing Policy

Stark County has created an affirmative marketing plan in order to comply with HOME program requirements. Its three primary objectives focus on individuals or families that may not normally apply for available housing units because they are socially/economically disadvantaged. These three objectives are:

1. Informing persons who are least likely to inquire about the availability of units.
2. Encouraging such persons to apply.
3. Providing them with equal opportunity to rent or own housing units.

The plan ensures that the public, potential tenants, and subrecipients of HOME funds are educated on their rights and responsibilities under fair housing law. All marketing material for a HOME funded project contains the Equal Housing Opportunity logo and/or the statement: “Equal Opportunity Housing. This housing is offered without regard to race, color, national origin, sex, religion, familial status or disability.”

Participants of the program are also required to submit their own affirmative marketing plan with their application. Every participant must also advertise in at least two outlets or venues that will reach potential applicants who are the least likely to apply for housing without special outreach. The list of outlets and venues includes community centers, neighborhood centers, and public libraries. All actions taken to affirmatively market HOME-assisted projects must be recorded thoroughly and accurately. The records will be reviewed by SCRPC annually in order to assess the success of the affirmative marketing policy and whether participants are remaining compliant. At this point, SCRPC may issue corrective actions, or SCRPC may determine not to recommend a participant receive HOME funding in the future.

Site and Neighborhood Selection Policy

The last AI noted that SCRPC’s HOME Policy and Compliance Manual should be amended to include a written policy that encompasses HUD’s site selection requirements (24 CFR 983.6) for HOME -assisted projects. There have not been any funded projects with 5+ units, however, if projects of that size are funded in the future, a checklist in the form of a worksheet will be created for the purpose of including a site selection policy that encompasses the requirements at 24 CFR 983.6. The updated Manual no longer requires a developer to gain evidence of support from residents in a project’s targeted neighborhood. The manual also stipulates that HOME applicants must provide a narrative description of how the project adheres to the County’s Five Year Consolidated Plan.

Appointed Boards Profile

The **Stark County Regional Planning Commission** works county-wide planning and development. Its board is comprised of 14 members. Eight of SCRPC’s board members are appointed by virtue of being an elected official, and will not be considered as part of this analysis. Of the remaining six members, all are White and male. In order to be more representative of the protected classes, the County should consider aligning the composition of the board to better reflect the population. For example, 51.5% of the County’s population is female. A more reflective board would be comprised of approximately three female board members.

Accessibility

Stark County has adopted the 2013 Residential Code of Ohio for the construction and alteration of every residential building and structure in its jurisdiction. Additional building code standards include:

- 2017 Ohio Mechanical Code
- 2017 National Electric Code
- 2017 Ohio Plumbing Code

The local building and zoning department is responsible for residential, commercial and industrial code enforcement.

Language Access Plan
According to the 2016 American Community Survey, there were 1,034 Spanish speaking people with a limited English proficiency in Stark County. Since HUD's safe harbor threshold for written translation of vital documents is 1,000, the County must at the least ensure its vital documents are translated; however, having a Language Access Plan would help the County provide more comprehensive services to this population, while preparing for its growth.

The County has conducted a four-factor analysis and completed draft of a Language Access Plan as of November 2016. A final draft is expected to be completed by the end of 2019.

Comprehensive Plan
The 2040 Land Use Plan, created in 2017, is the latest guide for development across Stark County's cities, villages and townships, covering the location of major transportation systems, public utilities, open space and recreation along with its employment, living and rural resource areas. This plan was first produced in 1965 and continues to be updated every 10 years. As prescribed by Ohio law, this regional plan is an advisory document to be used by local governments in preparing their own, more detailed local plans in accordance with their own goals and land use policies. It does not pre-empt the authorities of municipalities or townships in Stark County, but exists to expand and strengthen their capacities to make informed decisions.

The land use plan contains three major goals along with strategies to be applied to each:

1. Coordinate the development of land throughout Stark County in a more sustainable manner for future generations.
    a. Focus commercial land uses to infill existing commercial corridors and expand only into planned commercial areas.
    b. Reuse and/or repurpose existing industrial areas, utilizing assistance from the Stark County Land Bank and EPA brownfields grants.
    c. Consider the future use of vacant land carefully. Infill vacant land with appropriate uses, considering passive reuse options such as solar farms, walking trails or community gardens.
    d. Promote the preservation of agriculturally valuable land through tools such as agricultural district zoning, conservation easements and agricultural security areas.
2. Increase the market for locally grown foods through partnerships and programs.
    a. Promote local initiatives aimed at raising awareness of the importance of locally grown foods.
    b. Support efforts that increase access to locally grown foods, such as CSA's, farmer's markets, community gardens and farm to school/work programs.
    c. Amend policies to allow for urban farming on residential and/or vacant lots.
3. Focus new residential development efforts to create livable communities that are more compact, connected and diverse.

a. Modify subdivision and zoning regulations to encourage livable communities through the use of sidewalk requirements, street and/or pedestrian connectivity between allotments and open space/recreation amenities.
b. Encourage the creation of mixed-use developments and complete streets that facilitate pedestrian-friendly environments.
c. Encourage and facilitate the creation of greenways, serving as a connected network of open, green and natural spaces throughout Stark County.

Zoning
Stark County does not have county-wide zoning; instead zoning regulations are adopted by individual townships, cities and villages in accordance with the Ohio Revised Code. Twelve and one-half townships have adopted zoning out of the 17 unincorporated townships, as well as the six cities and nine of the villages located within the County.

ii) City of Alliance

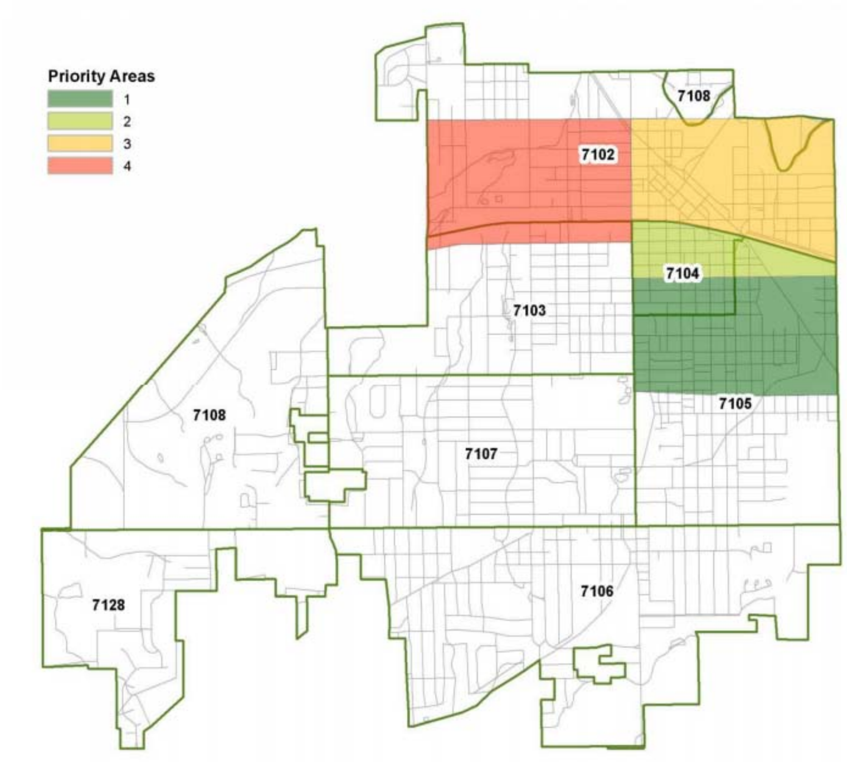
Overview
CDBG - $552,797 FY18
HOME - $116,928 FY18

The City of Alliance estimates that approximately 80% of CDBG funds will be dedicated to the target areas. The remaining balance, but not more than the 20% , will be used for administrative purposes.

Generally, the City limits its CDBG funds to four identified target areas as shown in the map below. Applications from sub-recipients are scored on a variety of measures and assigned numerical values. If the project is not located in one of the priority areas it receives a zero in the geographic location category. Alliance estimates that approximately 80% of its CDBG funds are dedicated to these target areas. The City's priority areas are where a large proportion of its LMI and minority populations live, and overlap with the City's impacted areas as discussed in the Demographic Profile earlier in this AI.

Affirmative Marketing Policy
The Alliance Affirmative Marketing Plan stipulates that developers, owners, and grantees must market housing opportunities to all persons in the housing market, including groups that are not likely to apply without special outreach efforts. This includes minority and LEP populations. All marketing materials must include the Fair Housing Logo or phrase "Equal Housing Opportunity". These efforts must be documented and maintained by the issuer. This plan applies to projects consisting of five or more HOME assisted units. Failure to comply may result in the denial or dismissal of allocated CDBG funding.

Alliance CDBG Priority Areas



Site and Neighborhood Selection
Alliance's HOME funds are administered by Stark County Regional Planning Commission, which follows rules set forth in 24 CFR 983.6. As such, Alliance is required to comply with the County's policy on site selection for HOME- assisted project of 5 or more units.

Appointed Boards and Commissions
The **Community Planning and Development Committee** reviews and approves staff recommendations for CDBG funding proposals. There are three members to the Committee. One is Black and the other two are White. There are two women on the Committee. The Committee provides representation of Alliance, which is 9.9% Black, 84.8% White, and 51% female. The City should consider adding a member who is disabled in order to represent the disabled community in CDBG funding decisions.

The **Citizens Relations Commission** hears complaints from persons in Alliance who believe they have been discriminated against due to their race, ethnicity, religion, class, or sex by a person employed by the City. It consists of seven members and four responded to the survey for the AI. Two members are Black, two are White, and there is equal representation for both male and female. One of the members is also disabled. The respondents of the survey are representative of the community, however, without more information on the remaining members a conclusion cannot be reached about its representation of the people of Alliance.

The **Planning Commission** has the authority to control the height, design, and location of all buildings in the City of Alliance. The Commission has seven members. Two members answered a survey for the AI. Both members are White, one is female, and neither have a disability. Without more information, a conclusion cannot be reached about its representation of the people of Alliance.

The **Board of Zoning Appeals** hears and decides appeals from the zoning inspector. Only one person answered a survey for the AI. Without more information, a conclusion cannot be reached about its representation of the people of Alliance.

Accessibility

The City of Alliance has adopted the Ohio Building Code to apply to the construction and alteration of every building and structure in the City. Residential dwellings are covered by the 2013 Residential Building Code of Ohio. Additional building code standards include:

- 2017 Ohio Mechanical Code
- 2017 National Electric Code
- 2017 Ohio Plumbing Code

Per the Ohio Building Code, accessibility standards for units are based on the ADA Accessibility Guidelines. The City's Planning and Development Department is responsible for code enforcement. The City's Health Department conducts code enforcement for interior health related codes that cover residential properties.

Language Access Plan

Alliance currently does not have a Language Access Plan for assisting residents with limited English proficiency. The City does not currently meet the HUD safe harbor threshold for persons with LEP. Stakeholders in Alliance said that this is a growing segment of the population, and Language Access Plan would enable the City to meet the language access needs of this population. The City's 2016 CAPER states that the Alliance is currently working on this initiative.

Zoning

Date of Ordinance	March 4, 2013	Comments
Updates	Periodically	
Stated Intent	The provisions of this Ordinance shall be considered as the minimum requirements necessary for the public health, safety, convenience, comfort, prosperity, and general welfare, and they shall apply uniformly to each kind or class of building, structure or land located within the City.	
Zoning districts and dwelling unit types permitted by right	R1 – Single Family R2 – Multi Family	
Minimum residential lot size permitted	R1 – 8,400 sq ft R2 – 8,400 sq ft	
Alternative design	Planned unit development provisions encourage a variety of	Alliance's PUD theoretically expands housing choice by integrating a

	single- and multi-family dwelling types compatible with the traditional aim of PUDs. Flexibility in requirements allows for innovation and efficiency in neighborhood design.	variety of single- and multi-family units.
Definition of family	One or more persons related by blood, marriage or adoption to live together in one residence unit and maintain a common household; or not more than two persons not related by blood, marriage or adoption who live together in one dwelling unit and maintain a common household.	This ordinance could be discriminatory towards nontraditional families. It is recommended that the City amend the definition to one based on a group of individuals functioning as a single housekeeping unit.
Treatment of group homes	Not defined, but are given conditional use in R2, subject to review by housing commission.	This is inconsistent with fair housing law. Group homes for persons with disabilities should be regulated in the same manner as single-family homes for persons without disabilities.

Comprehensive Plan

Alliance's Comprehensive Land Use Plan, adopted in 2004, was determined by the Stark County Regional Planning Commission to be consistent with the regional 2030 Comprehensive/Transportation Plan, adopted in 2005. The Plan was developed by McKenna Associates, Inc., with the aid of City staff members, City officials and substantial community and stakeholder input. The Plan proposes policy actions based on empirical data on the demographic, housing and economic conditions in the City and formulaic projections for future trends and needs. The Plan identifies the following conditions affecting housing in Alliance:

- Stock that was roughly 60% owner occupied, lower than state and Stark County averages of approximately 70%. The higher prevalence of renter housing is partially attributed to a) the City's location in a rural region, in which apartments are more typically located in more heavily developed areas with the infrastructure to support higher-density housing, and b) university students living in private off-campus rental units.
- Aging stock with more than 80% of units constructed prior to 1970
- Stock that was of size and quality typical of the County and state with 5.7 median rooms per unit, 1.5% of units classified as overcrowded (more than 1 person per room) and 0.5% lacking complete kitchen or plumbing facilities
- A variety of housing types with a higher percentage of multi-family dwellings than the County as a whole
- Expected continuation of population decline
- Expected increase in new housing construction as predicted by a building permit statistical model
- Market-rate rental stock that was determined to be generally affordable to all but extremely-low-income households

Based on these conditions, the Plan recommended the following policy actions related to housing:

- Apply CDBG funds and other resources to incentivize and facilitate housing maintenance
- Plan areas for new housing development to accommodate demand for new housing and for the replacement of units requiring demolition; ensure that new single-family housing is compatible with surrounding neighborhoods, housing types and densities
- Permit new multi-family uses only when a developer can provide market-based evidence of the need for additional such units, and subject to conditional use approval in limited areas or districts, and with appropriate site improvement requirements
- Monitor median incomes and market rates for housing to ensure that it remains affordable and assure that programs to assist extremely-low income households are available and accessible
- Permit private development of senior housing subject to conditional-use approval in limited areas or districts and with appropriate site improvement requirements; re-evaluate the need for senior housing when the Plan is next updated
- Require high-quality development to the extent feasible via the adoption of residential design standards
- Consider the establishment of a local historic district and local reviewing body

The Plan identifies specific areas targeted for future growth by annexation and/or further development, including parcels in surrounding townships that are not agriculturally or environmentally sensitive and do not pose difficulty to the installation of infrastructure or provision of services. The City of Alliance covered 9.4 square miles at the time of the Plan's composition with a build-out of 80.7%. Approximately 2,289 acres, or 49.2% of all City parcels, were classified as any type of residential. The Future Land Use Map envisions that 56.7% of the City's expanded land area (2,649 of 4,672 acres) would be single-family residential; 4.2% (197 acres) would be multi-family residential. This constitutes a substantial expected expansion of areas designated for single-family housing. The Plan does not specify the existing percentage of multi-family housing, but a comparison of current and future land use maps indicates that the City does not project corresponding growth in that housing type.

The City has continued to suffer from population loss since the Plan was created, and has not greatly expanded its residential land use through annexation. However, according to stakeholders, the City has been aggressively pursuing the removal of 153 vacant, blighted properties through the County's Neighborhood Initiative Program. This blight removal has had a profound effect on low- and moderate-income neighborhoods by replacing blight with green space.

iii) City of Canton

Overview
CDBG - $2,368,198 FY18
HOME – $449,673 FY18
ESG - $212,400 FY18

The City of Canton's Consolidated Plan describes the City's priority community development needs eligible for assistance under the CDBG, ESG and HOME Programs, including an assessment of housing, homeless, public facilities, infrastructure improvements, public services, accessibility, historic preservation, economic development, and planning needs. The Plan includes the City's long-term and short-term community development objectives that have been developed to address the national goals of the CDBG, ESG and HOME Programs, which include:

a. The provision of decent housing that is affordable to low and very low income households.
b. The provision of a suitable living environment, improving the safety and livability of neighborhoods, increasing access to quality facilities and services, improving housing opportunities, and revitalizing deteriorated neighborhoods.
c. The expansion of economic opportunities, creating jobs that promote long term economic and social viability and that are accessible to low and very low income persons.

The Consolidated Plan has identified the following priority needs that provide the programming focus over the last five years:

- Maintain and improve the quality of existing affordable housing
- Expand affordable housing opportunities
- Reduce housing cost burden
- Address homelessness issues
- Improve public facilities serving low and moderate income (LMI) neighborhoods
- Improve streets and sidewalks in LMI areas
- Remove barriers to accessibility
- Expand economic opportunities
- Provide Canton's special needs and low-income residents with services to improve their self-sufficiency
- Removal of blight and blighting influences in residential neighborhoods

Affirmative Marketing Policy: The City's Affirmative Marketing Policy, which applies to all HUD funded and City supported housing projects, was reviewed as part of this analysis. Canton's Affirmative Marketing Policy applies explicitly to the City's HOME projects.

The City's Department of Development is the agency deemed responsible for administering the Affirmative Marketing Policy. The Department's obligations include informing the community about the policy through periodic updates and training workshops with grantees: including HUD Equal Housing Opportunity designations on all of the City's graphic presentations related to the HOME program; distributing fair housing literature; and providing information to anyone who contacts the Department with questions regarding affirmative marketing, federal fair housing law, tenant rights, assisted housing and code violation in tenant-occupied dwellings.

The policy specifies a separate set of requirements for anyone participating in a housing project assisted with HOME funds. All requirements imposed on HOME property owners/developers are effective throughout the affordability period. In addition to incorporating Equal Housing Opportunity designations in all correspondence relating to the HOME program, participants must advertise vacant units (and those becoming vacant in 30 days) in The Reporter and/or other minority newspapers. The participant must also notify various local and county public agencies of the housing opportunity. To ensure that applications are solicited from those in the housing market who are least likely to apply without special outreach, the participant must send notice of the availability of units to a specified list of agencies serving special needs populations. Finally, the policy calls for the City to request owners of

HOME-assisted properties to maintain records on the demographic statistics of applicants and the ways in which vacancies were advertised.

Site and Neighborhood Selection

The City's 2014 – 2018 Consolidated Plan identifies its southern two-thirds as an area of investment of entitlement funds due to its concentration of minority and low- and moderate-income persons. While Canton has no stated site selection policy for HOME funds, the Consolidated Plan recognizes the need to expand housing choice in non-concentrated areas. There were 50 new rental units constructed and 30 new homeowner units constructed using CDBG and HOME funds during the period covered by the Consolidated Plan.

Appointed Boards Profile

The **Canton City Planning Commission** reviews any neighborhood renewal or urban development plan submitted to the City and submits its recommendations to the City Council. The Commission includes its approval or disapproval of the plan, and whether or not it conforms with the City's Comprehensive Plan or General Plan of the City. The Commission also reviews any zoning changes and planned changes to the City's zoning ordinances and submits its recommendations to the City Council where the final decision is made. The Commission is made up of eleven members. Three of the members are Black, eight are White, four are female. Canton is 24.3% Black, while Black representation on the City Planning Commission is 27.3% Black. The City is 53.2% female and the City Planning Commission is 36.4% female. The Commission is racially representative of Canton. In order to be more representative of the gender composition of Canton, the Commission should have six females on its eleven-member commission.

The **Board of Zoning Appeals** grants zoning variances, home occupations, and conditional uses in Canton. It is made up of five members. One member is Black and two are female. The Board is 20% Black compared to 27.3% of the population of Canton, which is a close representation on a five-member board. The Board is 40% female compared to Canton, which is 53.2% female. In order to best represent the population of Canton, the Board of Zoning Appeals should be either half or slightly more female than it currently is. It is recommended the Board add an additional member who is Black.

Accessibility

The City of Canton has adopted the Ohio Building Code to apply to the construction and alteration of every building and structure in the City. One-, two- and three-family dwellings are also subject to the 2013 Residential Building Code of Ohio. Additional building code standards include:

- 2017 Ohio Mechanical Code
- 2017 National Electric Code
- 2017 Ohio Plumbing Code

Per the Ohio Building Code, accessibility standards for units are based on the ADA Accessibility Guidelines. The City's Building Department's Code Enforcement Division is responsible for residential, commercial and industrial code enforcement.

Language Access Plan

The City has conducted a four factor analysis and determined the appropriate steps for providing services for limited English proficiency individuals. Steps in the Language Access Plan include:

- Interpreters of the Spanish language are available for large, small, and one-on-one meetings and will be provided within a meaningful time.
- Language interpretation will be accessed for all other languages through a telephone interpretation service.
- Vital documents from the Department of Development and the Office of Fair Housing will be translated into Spanish and any other appropriate languages as requested

The plan also includes provisions for staff training and continual monitoring of how the plan conforms to the needs of Canton's limited English proficiency residents.

Zoning

Date of Ordinance	Feb. 1977	Comments
Updates	Periodically	
Stated Intent	It shall be the practice of the City to maintain current a Zoning Ordinance which reflects the goals and objectives of a land use policy for this community. Such policy shall focus its intent upon land use controls which promote the stability and preservation of residential neighborhoods, encourage the economic stability and growth of the community; and provide for the compatibility of these uses in such a way as will not adversely affect either residential or commercial/industrial stability and growth.	
Zoning districts and dwelling unit types permitted by right	R1 – Single Family R2 – Two Family R3 – Garden and Townhouse Apartment R4 – Multifamily	Canton offers a variety of zones and minimum lot sizes.
Minimum residential lot size permitted	R1 – 8,000 sq ft R2 – 6,000 sq ft (single family), 3,000 sq ft/family (two family) R3 – R2 + 2,400 sw ft (multifamily) R4 – Same as R3	
Alternative design	Planned unit development provisions encourage a variety of single- and multi-family dwelling types compatible with the traditional aim of PUDs. Flexibility in requirements allows for innovation and efficiency in neighborhood design.	Canton's PUD theoretically expands housing choice by integrating a variety of single- and multi-family units.

Definition of family	One or more persons related to each other by birth, marriage, or law, occupying a dwelling unit and living as a single housekeeping unit or four (4) or fewer persons unrelated by birth, marriage or law and living in a dwelling unit as a single housekeeping unit. This is to be distinguished from persons in a boarding house, fraternity house, sorority house, lodging house, group home of seven (7) or more persons, motel, hotel or rooming house. (Ord. 132-2009. Passed 8-3-09.)	This could discriminate against some nontraditional families, such as non-related individuals living as a single housekeeping unit and/ to save money.
Treatment of group homes	"Residential social service facility" means a facility or home which provides resident services to a group of individuals of whom one or more are unrelated; it may provide additional supervised programming services. Group homes are also found under definition of family.	This definition is consistent with fair housing law.

Comprehensive Plan
The City's latest Comprehensive Plan was adopted in 2016. The Plan was created under the presumption that the City and region will not be growing in the near future, and sets priorities that strive to protect the City's assets and reinvest in neighborhoods. In order to achieve its goals, the Plan uses planning principles that are designed consolidate around the City's assets, while growing neighborhoods at an appropriate pace. To ensure these principles are being adhered to, the Plan tests whether development decisions strive to pass certain criteria in order to move forward. That criteria is as follows:

- A critical test to be applied to each land use and development decision going forward is whether or not it will likely result in Canton becoming more competitive within the region. The burden should be on a proposal to demonstrate how it makes the City's market position stronger. Only those proposals that clearly promise to strengthen the City in relation to the region should receive public resources; a proposal that might add a dollar to the City is not a good proposal if in the nature of it, the competition benefits by more than a dollar.
- A critical test to be applied to each land use and development decision going forward is whether or not it will likely result in moving Canton towards or away from being right-sized. All else being equal, and while a portfolio approach is appropriate, only those proposals likely to help Canton rebalance excess supply should be approved.
- A critical test to be applied to each land use and development decision going forward is whether or not it will likely result in a continuation of focused energy in targeted geographies so as to achieve a concentration of development activity. Until the City's supply and demand are in sustainable balance, only those proposals that maintain geographic focus should become high priority endeavors.
- A critical test to be applied to each land use and development decision going forward is whether or not it will likely result in Canton becoming diverse. All else being equal, only those proposals

that clearly aim to achieve a diverse economic and residential outcome should receive public resources.

The Plan also establishes residential land use directions as follows:

1. Establish and enforce clear standards for maintenance of vacant properties by private owners. This will increase the cost of doing business for those owners who have traditionally not maintained their properties adequately. It will also motivate responsible landlords while serving to penalize toxic speculators. For those who do not wish to meet the standards, it will drive their properties into the public domain.
2. In a focused, prioritized, and coordinated way, acquire, demolish, and assemble vacant and problem properties. It is expensive just to demolish buildings ($5,000-$6,000 for a typical single family residence). While the community will have to prioritize on an on-going basis as market conditions evolve, demolitions will be more valuable to the overall health of the City in this order:
    - Core Areas
        - Downtown proximity
        - Aultman Hospital proximity
        - Mercy Hospital proximity
        - Hall of Fame Village proximity
        - Timken Steel proximity
    - In the immediate proximity of neighborhood asset areas, with a priority to areas around
        - Schools
            - High Performing
        - Historic architecture
        - Parks
        - Community Centers
    - Areas to be repurposed, with a priority to areas
        - Visible from key intersections
    - Quick wins where cleared (clean/green) property can be conveyed to adjoining owners

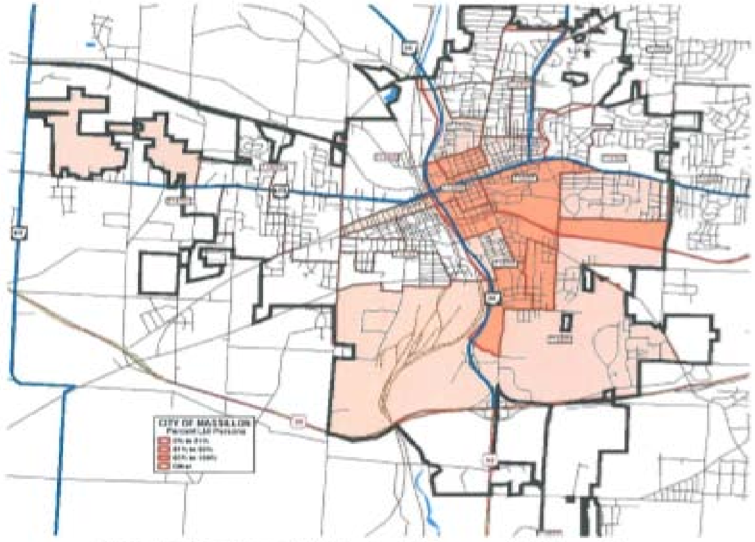
The Plan briefly addresses fair housing through the use of updated zoning codes, but does not lay out any clear steps that can accomplish fair housing goals. Most of the Plan's recommendations with regards to housing center on stabilizing neighborhoods through the demolition of vacant, blighted properties. It stipulates that residential redevelopment should occur when vacant plots can be used to create a better quality of life for residents and connect different neighborhoods in appealing ways.

iv) City of Massillon

Overview
CDBG - $604,797 FY18
HOME - $123,083 FY18

Massillon devotes no more than 20% of its funds to administrative costs and the remaining 80% is directed towards its identified target areas. These areas are identified as target areas due to their high concentrations of low- and moderate-income and minority persons. The City's target areas also overlap the impact areas identified in the Demographic Profile earlier in this AI.

Massillon CDBG Priority Areas



Massillon Target Area Neighborhood Demographic Information

Census Tract	Block Group	Total Persons	Per Cent Minority	Total House-holds	Percent Female Headed	Total Housing Units	PerCent Owner Occupied	Per Cent LowMod Persons
713700	2	1,081	12%	494	34%	481	66%	53.2%
713700	3	544	4%	255	49%	296	31%	74.6%
713800	1	262	20%	188	43%	190	4%	95.4%
714100	1	1,201	8%	513	38%	541	66%	50.9%
714200	1	542	63%	255	41%	231	67%	76.6%
714200	2	753	43%	271	32%	267	63%	72.2%
714200	3	813	59%	340	58%	392	40%	63.2%
714200	4	729	29%	252	34%	288	68%	56.5%
714301	1	1,554	8%	690	31%	711	57%	54.7%
714301	2	1,298	11%	668	48%	656	42%	67.5%
714302	2	1,555	30%	694	40%	698	58%	55.4%
714400	2	1,840	31%	508	36%	575	54%	61.0%
TOTALS		12,172	24%	5,128	40%	5,326	54%	61.1%

Site and Neighborhood Selection
Most of the Massillon's Action Plan activities will be directed to those areas of the City with high concentrations of low income and minority persons, including Census Tracts 7138, 7142, 7143.01, and 7144, and portions of tracts 7137, 7141 and 7143.02. By directing the majority of its federal funding to these areas, the City will help to ensure that its program will benefit LMI persons most in need of assistance. Other projects that have been identified as primarily City-wide in scope are also expected to serve the residents of these targeted neighborhoods. In particular, housing programs are targeted to serve low income households, but such assistance can also help improve low income neighborhoods.

The City's HOME funds are administered by Stark County Regional Planning Commission, which follows rules set forth in 24 CFR 983.6. As part of the Stark County Home Consortium, Massillon is also required to comply with the County's policy on HOME funds.

Affirmative Marketing Policy

Though the City typically does not apply CDBG resources to activities that would trigger compliance with affirmative marketing regulation, the City does adopt a general affirmative marketing policy for housing developments assisted by any City funds that contain five or more units. Affirmative marketing requirements and procedures also apply to all HOME-funded programs (e.g. homeowner rehabilitation and homebuyer assistance), including activities affecting housing projects with five or more units.

As a Participating Jurisdiction (PJ), the City of Massillon's Affirmative Marketing procedures are as follows:

1. Advertising:

- The Equal Opportunity logo or slogan will be used in all ads, brochures, and written communications to owners and potential tenants. This may include the local newspaper (Independent) Massillon Cable Services (television), local radio stations, internet and housing connections, brochures, flyers, and adequate sign on the walls or placed in establishment windows.

- Communicating the equal housing opportunity message.

- Utilizing HUD Form 935.2 Affirmative Fair Housing Marketing Plan, a useful tool for organizing and documenting the affirmative marketing plan for owners.

2. Fair Housing Posters:

It is imperative that Owners display the HUD's fair housing poster in rental offices or other appropriate locations that potential recipients have access to.

3. Outreach:

Owners must solicit applications for vacant units from persons in the housing market who are least likely to apply for HOME – or assisted housing without the benefit of special outreach efforts. Minority Media, inclusive of newspapers such as the Reporter, which are specific to the minority community would be targeted in further informing the community.

- Providing adequate information, outlining services, would be distributed to those serving the targeted communities.
- Networking with other agencies to ensure that knowledge of the Affirmative Action Marketing Plan is available and that referrals can be on-going in providing assistance.

4. Recording Keeping:

- Files containing documentation of all marketing efforts will be maintained and available for inspection by Massillon City CDBG and HOME Programs.

5. Assessment & Corrective Actions:

- The success and effectiveness will be measured by the response of target populations who are served (projects with five or more HOME-assisted units).

- The assessment will cover marketing relative to the units first made available for occupancy during the CDBG/HOME Program Year.

- The demographic area will be the determining factor as occupancy data is required to be maintained. Outreach efforts will be evaluated by reviewing marketing efforts. If marketing requirements are not followed, corrective action will be required and ways discussed to improve procedures. When required, participants that do not improve through the following corrective actions will be prohibited from further participation in the HOME Program.

Specific Corrective Action:

- Require that all advertisements, brochures, and other written materials be published in multiple languages.

- Specifying the media sources an owner must use in order to advertise a particular audience (such as a newspaper that serves protected classes).

- Providing and requiring the use of specific mailing lists or organizations whose membership or clientele consists primarily of protected class members.

As a PJ the City is obligated to adopt affirmative marketing procedures, and to impose affirmative marketing activities on project owners of HOME – funded rental and homeownership projects of five or more HOME – assisted units. These special outreach efforts should be targeted to those who are least likely to apply for HOME funds, to ensure that all persons-regardless of their race, color, national origin, age, religion, sex, disability or familial status are aware of the affordable housing opportunities generated by HOME Program activities.

Appointed Boards Profile

The **Fair Housing Board** is involved with the planning, problem solving, and overseeing events related to fair housing along with problem distributing fair housing information. The board has 6 members with one of those members being Black (16.7%), while the rest are all White. There is an even split between male and female members. There are no members with a disability. Racial minorities make up 10.6% of the City's population, and so this population is well represented on this board. Because persons with disabilities are often facing fair housing issues it is recommended that Massillon add a qualified person with a disability to this board when possible.

The **Disability Board** is involved in the planning of events, problem solving, and distributing information on available resources and applicable laws for persons with disabilities. It consists of 15 members – 2 of which are Black (13.3%). There are 5 women (33.3%) on the board and 3 persons with a disability (20%). None of the members with a disability are minorities. This board is generally representative of Massillon's population, however, the City should consider the addition of a qualified minority with a disability in order to better represent the many possible perspectives in Massillon.

The **Health Board** votes on all activities of the Health Department and its fiduciary expenditures. It is also concerned on all things that affect the Citizens of Massillon. It contains 9 board members. Of its members, 5 are female (45.5%) and 1 is Black (11.1%). There are no members with a disability. While this board is largely representative of the City, it is recommended that there be an additional member with a disability in order to represent this population's perspective to the board.

The **Planning Commission** oversees planning for Massillon. The Commission contains 9 board members. Of its 9 members, 3 are female (33.3%) and there are no racial or ethnic minorities. There are zero members with a disability. In order to improve the ability for a commission with such importance to fair housing, it is recommended the Commission seek qualified minorities as additional members.

The **Zoning Board of Appeals** hears and decides on appeals to the City's zoning ordinances. It has 5 members who are all male. There is only 1 member who is Black (20%) and none with a disability. In order to be more representative it is recommended that the board seek additional qualified candidates who are female and add at least 1 member with a disability.

Language Access Plan: No language access plan. The City has not met the safe harbor guidelines set forth by HUD, but a language access plan would help the City better serve its Spanish speaking population.

Accessibility

The City of Massillon has adopted the Ohio Building Code to apply to the construction and alteration of every building and structure in the City. One-, two- and three-family dwellings are also subject to the 2013 Residential Building Code of Ohio. Additional building code standards include:

- 2017 Ohio Mechanical Code
- 2017 National Electric Code
- 2017 Ohio Plumbing Code

Per the Ohio Building Code, accessibility standards for units are based on the ADA Accessibility Guidelines. The City's Building and Zoning Department is responsible for residential, commercial and industrial code enforcement.

Zoning

Date of Ordinance	March 1978	Comments
Updates	Periodically	
Stated Intent	The general purpose of these Subdivision Regulations shall be to control the subdivision of all land in the City, in accordance with the adopted General Development Plan, in order to promote the public health, safety, comfort, convenience, and general welfare	
Zoning districts and dwelling unit types permitted by right	R1 through R4 – Single Family RT – Two Family RM1 through RM2 – Multi family	Massillon offers a variety of zones and minimum lot sizes.
Minimum residential lot size permitted	R1 – 7,800 sq ft R2 – 9,600 sq ft R3 – 12,000 R4 – ½ acre RT – 4,800 RM – None defined	

Alternative design	Planned unit development provisions encourage a variety of single- and multi-family dwelling types compatible with the traditional aim of PUDs. Flexibility in requirements allows for innovation and efficiency in neighborhood design.	Massillon's PUD theoretically expands housing choice by integrating a variety of single- and multi-family units.
Definition of family	Family means one or two persons or parents, with their direct lineal descendants and adopted children (and including the domestic employees thereof) together with not more than two persons not so related, living together in the whole or part of a dwelling unit. Every additional group of two or less persons living in such dwelling unit shall be considered a separate family for the purpose of the Zoning Ordinance.	This definition appears to be consistent with fair housing law.
Treatment of group homes	Group Home means a Residential Social Service Facility, licensed under Ohio R.C. 5123.19, that provides room and board, personal care, habilitation services, and supervision in a family setting for at least nine, but not more than sixteen persons with developmental disabilities. Conditionally permitted in RM1 and RM2.	This is inconsistent with fair housing law. Group homes for persons with disabilities should be regulated in the same manner as single-family homes for persons without disabilities.

Comprehensive Plan

Massillon's latest comprehensive planning document is the Future Land Use Plan prepared in 1969. Over the years, portions of the Plan have been updated, including the Central Business District Plan, Park and Recreation Plan and Transportation Plan. For the purpose of planning for the investment of entitlement funds, the City does not heavily rely on the Future Land Use Plan, instead conducting research and estimating housing and community development needs via the Five-Year Consolidated Planning process.

The housing component of the Future Land Use Plan envisions 13 distinct residential areas, neighborhoods separated by thoroughfares and other land uses. The Plan estimates that at full build-out within the City's 1969 borders, the City could adequately accommodate 41,700 persons. The Census population for Massillon was 32,539 in 1970 and 32,268 in 2016.

The Plan suggests a significant expansion of areas where multi-family housing could be developed, with a commensurate increase in recreational and public lands. Additionally, the Plan calls for the "stabilization" of single-family residential areas and provision for a variety of lot sizes. Low-rise multi-family development is proposed in close proximity to the Central Business District to transition between non-residential and single-family uses.

B. Review of Private Sector Policies

a) Mortgage Lending Practices

Under the terms of the Financial Institutions Reform, Recovery, and Enforcement Act of 1989 (F.I.R.R.E.A.), any commercial lending institution that makes five or more home mortgage loans must report all residential loan activity to the Federal Reserve Bank under the terms of the Home Mortgage Disclosure Act (HMDA). The HMDA regulations require most institutions involved in lending to comply and report information on loans denied, withdrawn, or incomplete by race, sex, and income of the applicant. The information from the HMDA statements assists in determining whether financial institutions are serving the housing needs of their communities. The data also helps to identify possible discriminatory lending practices and patterns.

The most recent HMDA data available for Stark County is from 2014 to 2017. Reviewing this data helps to determine the need to encourage area lenders, other business lenders, and the community at large to actively promote existing programs and develop new programs to assist residents in securing home mortgage loans for home purchases. The data focus on the number of homeowner mortgage applications received by lenders for home purchase of one- to four-family dwellings and manufactured housing units in the county. The information provided is for the primary applicant only. Co-applicants were not included in the analysis. In addition, where no information is provided or categorized as not applicable, no analysis has been conducted due to lack of information.

The type of mortgage from 2014 to 2017 included conventional mortgage loans and a variety of government-backed loans. Comparing these loan types helps to determine if the less stringent underwriting standards and lower down payment requirements of government-backed loans expand home ownership opportunities. The majority of mortgage applications from 2014 to 2017 were for conventional loans (76.1%) followed by Federal Housing Administration (FHA) insured loans (17.2%) and VA loans (6.2%). The last AI for Stark County contained loan data from 2007 to 2014. During this time period less than half of all loans were conventional loans. The change in the proportion of conventional and government backed loans in the county in 2009 and 2017 could be occurring across the country. According to data from the Federal Reserve, the pool of government backed mortgages fell by 82% in 2010, and has not yet recovered to pre-recession levels.[11]

[11] Board of Governors of the Federal Reserve System (US), Agency-and GSE-Backed Mortgage Pools; Total Mortgages; Asset, Level [AGSEBMPTCMAHDFS], retrieved from FRED, Federal Reserve Bank of St. Louis; https://fred.stlouisfed.org/series/AGSEBMPTCMAHDFS, September 6, 2018.

Figure 3-1 Loan Applications by Type 2014 – 2017

	2014	2015	2016	2017	Application Approved		Application Denied		Grand Total
Alliance	**202**	**216**	**232**	**175**	**502**	**100.0%**	**323**	**100.0%**	**825**
Conventional	149	153	159	114	302	60.2%	273	84.5%	575
FHA-insured	45	50	56	48	164	32.7%	35	10.8%	199
FSA/RHS-guaranteed	2	2	1	-	4	0.8%	1	0.3%	5
VA-guaranteed	6	11	16	13	32	6.4%	14	4.3%	46
Canton	**760**	**788**	**771**	**607**	**1,873**	**100.0%**	**1,053**	**100.0%**	**2,926**
Conventional	563	562	527	417	1,156	61.7%	913	86.7%	2,069
FHA-insured	164	177	192	122	552	29.5%	103	9.8%	655
FSA/RHS-guaranteed		3	2	2	4	0.2%	3	0.3%	7
VA-guaranteed	33	46	50	66	161	8.6%	34	3.2%	195
Massillon	**221**	**225**	**247**	**204**	**544**	**100.0%**	**353**	**100.0%**	**897**
Conventional	159	165	169	146	321	59.0%	318	90.1%	639
FHA-insured	47	40	50	47	156	28.7%	28	7.9%	184
FSA/RHS-guaranteed	2	1	-	-	2	0.4%	1	0.3%	3
VA-guaranteed	13	19	28	11	65	11.9%	6	1.7%	71
Urban County	**1,994**	**2,144**	**2,480**	**1,785**	**4,307**	**100.0%**	**4,096**	**100.0%**	**8,403**
Conventional	1,618	1,720	1,897	1,411	2,904	67.4%	3,742	91.4%	6,646
FHA-insured	253	310	402	242	977	22.7%	230	5.6%	1,207
FSA/RHS-guaranteed	14	17	11	14	42	1.0%	14	0.3%	56
VA-guaranteed	109	97	170	118	384	8.9%	110	2.7%	494
Grand Total	**3,177**	**3,373**	**3,730**	**2,771**	**7,226**	**-**	**5,825**	**-**	**13,051**

Note: Data is for mortgage applications (home purchase, refinance, and home improvement) for one-to-four family and manufactured units. Data only includes applications that were denied by the financial institution or originated. Does not include other application outcomes (approved but not accepted, withdrawn, and incomplete). Does not include loans purchased by another institution.
Source: Consumer Financial Protection Bureau, accessed online at < https://www.consumerfinance.gov/data-research/hmda/explore>

From 2014 to 2017, 64.4% of all applications were for homes in the Urban County – nearly matching the Urban County's share of the households (65.5%). All three urban areas are also applying at rates that are nearly proportional to their share of the county's households. The same proportional representation is seen in each area's share of originated loans. Applications peaked in 2016 at 3,730 for the whole county and then fell by 25.7% in 2017.

The last AI contained loan data from 2007 to 2009, which fell during the United States' biggest economic crisis since the Great Depression. During this time period, the availability of credit – particularly for home mortgages – became tight. Since the end of the recession, lending standards for mortgages have become more stringent, which has led to a lower rate of mortgage origination. In 2009, 79.5% of mortgage applications in Stark County were originated. By 2017, only 48.8% of mortgage applications led to an origination (i.e., loan approval).

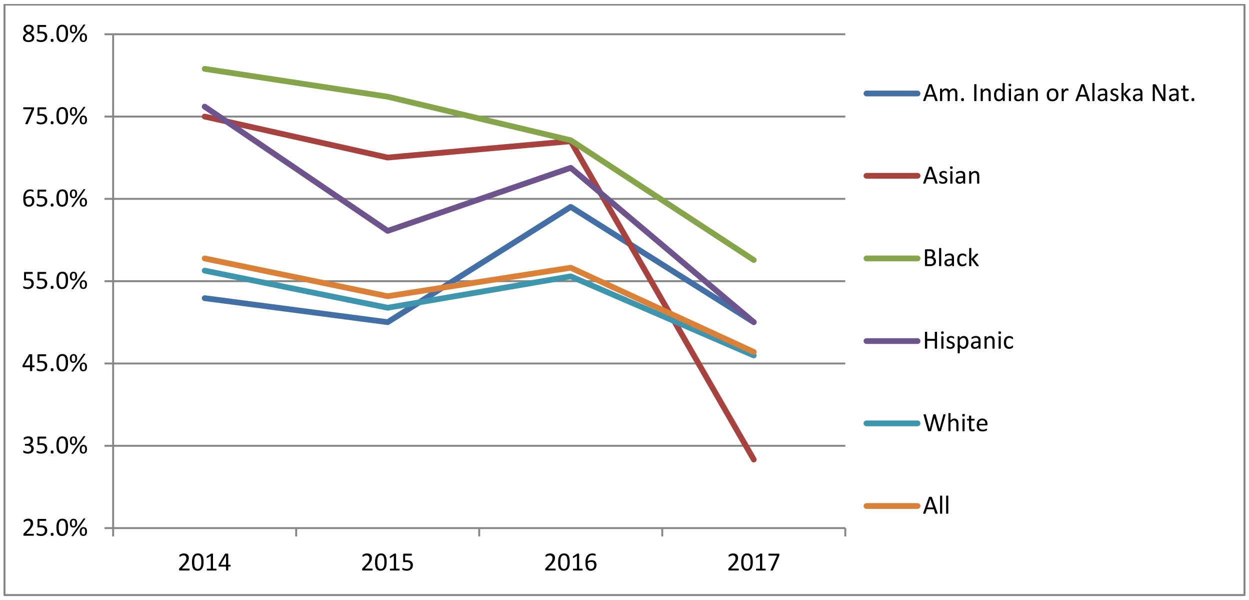
Figure 3-2 Mortgage Applications and Denials by Race 2014 – 2017

	2014				2015			
	Total Apps	% of Applications	Denials	% of Denials	Total Apps	% of Applications	Denials	% of Denials
Am. Indian or Alaska Nat.	17	0.6%	9	0.6%	16	0.5%	8	0.5%
Asian	28	1.0%	21	1.3%	20	0.7%	14	0.9%
Black	130	4.6%	105	6.5%	146	4.8%	113	7.0%
Hispanic	21	0.7%	16	1.0%	18	0.6%	11	0.7%
White	2,608	93.0%	1,468	90.7%	2,821	93.4%	1,460	90.9%
Total	**2,804**	100.0%	**1,619**	100.0%	3,021	100.0%	1,606	100.0%
	2016				**2017**			
	Total Apps	% of Applications	Denials	% of Denials	Total Apps	% of Applications	Denials	% of Denials
Am. Indian or Alaska Nat.	25	0.7%	16	0.8%	14	0.6%	7	0.6%
Asian	25	0.7%	18	0.9%	21	0.8%	7	0.6%
Black	147	4.4%	106	5.6%	106	4.2%	61	5.2%
Hispanic	32	1.0%	22	1.2%	28	1.1%	14	1.2%
White	3,118	93.2%	1,733	91.5%	2,352	93.3%	1,081	92.4%
Total	3,347	100.0%	1,895	100.0%	2,521	100.0%	1,170	100.0%

Note: Data is for mortgage applications (home purchase, refinance, and home improvement) for one-to-four family and manufactured units. Data only includes applications that were denied by the financial institution or originated. Does not include other application outcomes (approved but not accepted, withdrawn, and incomplete). Does not include loans purchased by another institution.
Source: Consumer Financial Protection Bureau, accessed online at < https://www.consumerfinance.gov/data-research/hmda/explore>

Over 90% of loan applications were submitted by White applicants. The rate at which White applicants are denied mortgages is also consistently among the lowest denial rates from 2014 to 2017. The graph below shows that mortgage applications from Whites are denied at lower rates than the overall household rate. Contrasting the White denial rate, Blacks are consistently denied at a rate much higher than the overall household rate. Overall, denial rates have been trending lower – falling over 10 percentage points from 2014 to 2017.

Figure 3-3 Trend of Denial Rate, 2014 – 2017



Note: Data is for mortgage applications (home purchase, refinance, and home improvement) for one-to-four family and manufactured units. Data only includes applications that were denied by the financial institution or originated. Does not include other application outcomes (approved but not accepted, withdrawn, and incomplete).Does not include loans sold to other institutions.
Source: Consumer Financial Protection Bureau, accessed online at < https://www.consumerfinance.gov/data-research/hmda/explore>

Credit history was the primary reason for denials in all racial and ethnic groups except for Asian applicants where debt-to-income ratio was the biggest driver of rejections. A poor credit history or, as local stakeholders revealed is often the case, no credit history; and a high debt-to-income ratio can be barriers for low- and moderate-income (LMI) households looking to achieve homeownership, even in affordable markets like Stark County.

The second most cited reason for denial is collateral, where appraisals do not meet the minimum price point set by sellers. This suggests that either the housing stock in the County, much of it older and in disrepair, is not valuable enough to secure a loan at the price being demanded by sellers, or it is currently a seller's market where bidding wars push up the prices of homes.[12] Interviews with stakeholders indicate the former is likely the case.

The most common application denials are:

- Credit History (26.4%)
- Collateral (26%)
- Credit Application Incomplete (17.2%)
- Debt-to-Income Ratio (17.1%)

[12] Core Logic, accessed online < https://www.corelogic.com/blog/2016/11/collateral-issues-are-third-most-likely-cause-of-mortgage-loan-denial.aspx >

Figure 3-4 Stark County Denials for Lower-Income Applicants by Race, 2014 – 2017

	2014			2015			2016			2017		
	Total Apps	Denials	Denial Rate	Total Apps	Denials	Denial Rate	Total Apps	Denials	Denial Rate	Total Apps	Denials	Denial Rate
Am. Ind. or Alaska Native	10	7	70.0%	2	2	100.0%	11	10	90.9%	6	5	83.3%
Asian	8	8	100.0%	5	5	100.0%	12	11	91.7%	5	3	60.0%
Black	61	50	82.0%	75	55	73.3%	73	51	69.9%	53	33	62.3%
Hispanic	9	6	66.7%	7	6	85.7%	8	7	87.5%	9	7	77.8%
White	854	585	68.5%	991	601	60.6%	1,065	691	64.9%	840	477	56.8%
Grand Total	**942**	**656**	**69.6%**	**1,080**	**669**	**61.9%**	**1,169**	**770**	**65.9%**	**913**	**525**	**57.5%**

Note: Data is for mortgage applications (home purchase, refinance, and home improvement) for one-to-four family and manufactured units. Data only includes applications that were denied by the financial institution or originated. Does not include other application outcomes (approved but not accepted, withdrawn, and incomplete).Does not include loans sold to other institutions.
Source: Consumer Financial Protection Bureau, accessed online at < https://www.consumerfinance.gov/data-research/hmda/explore>

There are still differences in denial rates between races and income groups. Low- and moderate-income applicants saw their denial rate fall from 69.6%% in 2014 to 57.5%% in 2017.[13] Whites were the only lower-income group to consistently have a lower denial rate reaching a rate of 56.8% in 2017. Other LMI groups had much fewer applications, however, they were generally denied at higher rates. Overall, LMI applications were denied at higher rates than upper income applications.

Figure 3-5 Stark County Denials for Upper-Income Applicants by Race, 2014 – 2017

	2014			2015			2016			2017		
	Total Apps	Denials	Denial Rate	Total Apps	Denials	Denial Rate	Total Apps	Denials	Denial Rate	Total Apps	Denials	Denial Rate
Am. Indian or Alaska Native	7	2	28.6%	13	5	38.5%	13	5	38.5%	8	2	25.0%
Asian	20	13	65.0%	15	9	60.0%	12	6	50.0%	16	4	25.0%
Black	62	49	79.0%	62	54	87.1%	65	46	70.8%	43	21	48.8%
Hispanic	11	9	81.8%	9	3	33.3%	22	13	59.1%	18	6	33.3%
White	1,665	824	49.5%	1,714	767	44.7%	1,915	934	48.8%	1,439	560	38.9%
Grand Total	**1,765**	**897**	**50.8%**	**1,813**	**838**	**46.2%**	**2,027**	**1,004**	**49.5%**	**1,524**	**593**	**38.9%**

Note: Data is for mortgage applications (home purchase, refinance, and home improvement) for one-to-four family and manufactured units. Data only includes applications that were denied by the financial institution or originated. Does not include other application outcomes (approved but not accepted, withdrawn, and incomplete). Does not include loans sold to other instutions.
Source: Consumer Financial Protection Bureau, accessed online at < https://www.consumerfinance.gov/data-research/hmda/explore>

From 2014 to 2017 both upper- and lower-income applicants saw their denial rates fall, however, there is still an almost 20-point difference between the two. In 2017 LMI applicants were denied at a rate of 57.5% compared to 38.9% for upper-income applicants. Black applicants faced the highest rejection rate among upper-income applicants, indicating that Black households face more hurdles than other groups in accessing credit – regardless of income.

---

[13] For this analysis, lower-income households include those with incomes between 0%-80% of MFI, while upper-income households include households with incomes above 80% MFI.

In 2009 the rejection rate for Black applicants was 22.2% and 10.9% for Whites, when the financial crisis had not yet subsided. Rejection rates have likely increased due to more households feeling confident enough to apply for a mortgage and favorable mortgage interest rates. At the same time, banks have not loosened their underwriting procedures to the levels they were at pre-crisis –especially for subprime borrowers—leading to a high number of rejections.

The disparity between White and Black applicants, regardless of income, warranted further analysis. The probability of a mortgage being originated given the race of the applicant can be determined controlling for the proportion of all applicants of a certain race and overall mortgage acceptance rates.[14] This statistical analysis determined the probability of someone receiving a loan given their race based on historical rates of loan origination. It does not mean that applicants are rejected purely because of their race or ethnicity, but it can show if there are significant differences between two race receiving loans.

Figure 3-6 Probability of Mortgage Origination Given Race of Applicant, 2014 - 2017

	2014	*2015*	*2016*	*2017*
Black	19.2%	22.6%	27.9%	42.5%
White	43.7%	48.3%	44.4%	54.0%

Note: Data is for mortgage applications (home purchase, refinance, and home improvement) for one-to-four family and manufactured units. Data only includes applications that were denied by the financial institution or originated. Does not include other application outcomes (approved but not accepted, withdrawn, and incomplete). Does not include loans sold to other instutions.

Source: Consumer Financial Protection Bureau, accessed online at < https://www.consumerfinance.gov/data-research/hmda/explore>

The rate of origination given the applicant is Black rose faster than the origination rate for White applicants from 2014 to 2017; however, there remains a large gap between the two—11.5 percentage points in 2017. The large difference between the two means there are factors that are affecting the ability of Black residents to qualify for a mortgage more than White applicants. Interviews with local stakeholders points to credit scores as the likely culprit. Credit scores, which is one of the primary reasons given for loan denial in Stark County, disproportionately affect Blacks in the United States. One study found a difference of 100 points between predominantly White areas and Black areas in 38 out 60 major cities studied.[15] Efforts at credit counseling and building a strong credit history directed towards LMI and racially concentrated areas could help close the acceptance gap between Black and White applicants while promoting homeownership.

[14] This analysis used Baye's Theorem, which is a mathematical theorem for determining conditional probability. It goes by the formula: P(A|B) = [P(B|A)*P(A)]/P(B), where P(A|B) = the probability obtaining a mortgage given the individual's race is known, P(B|A) = the probability an applicant of that race received a loan, P(A)=the probability of any applicant receiving a loan, and P(B) = the probability an applicant is of that race.

[15] The Urban Institute, accessed online < *https://www.urban.org/urban-wire/credit-scores-perpetuate-racial-disparities-even-americas-most-prosperous-cities*>

b) High-Cost Lending Practices

The widespread housing finance market crisis in the recent past brought a new level of public attention to lending practices that victimize vulnerable populations. Subprime lending, designed for borrowers who are considered a credit risk, has increased the availability of credit to low-income persons. At the same time, subprime lending has often exploited borrowers, piling on excessive fees, penalties and interest rates that make financial stability difficult to achieve. Higher monthly mortgage payments make housing less affordable, increasing the risk of mortgage delinquency and foreclosure and the likelihood that properties will fall into disrepair.

Some subprime borrowers have credit scores, income levels and down payments high enough to qualify for conventional, prime loans, but are nonetheless steered toward more expensive subprime mortgages. This is especially true of minority groups, which tend to fall disproportionately into the category of subprime borrowers. The practice of targeting minorities for subprime lending qualifies as mortgage discrimination.

Since 2005, Housing Mortgage Disclosure Act data has included price information for loans priced above reporting thresholds set by the Federal Reserve Board. This data is provided by lenders via Loan Application Registers and can be aggregated to complete an analysis of loans by lender or for a specified geographic area. HMDA does not require lenders to report credit scores for applicants, so the data does not indicate which loans are subprime. It does, however, provide price information for loans considered "high-cost." A high-cost loan is defined as a loan with an annual percentage rate that exceeds that average prime offer rate for a comparable transaction by at least 1.5 percentage points for a first-lien loan and 3.5 percentage points for any subordinate lien loans.

Figure 3-7 High Cost Home Purchase Loans by Race and Income, 2014 – 2017

		Upper Income			Lower Income		
		High-Cost	Total Originated	% High-Cost	High-Cost	Total Originations	% High-Cost
2014	Am. Indian or Alaska Nat.	-	2	0.0%	1	3	33.3%
	Asian	-	8	0.0%	-	4	0.0%
	Black or African American	1	22	4.5%	3	13	23.1%
	Hispanic	-	2	0.0%	-	2	0.0%
	NA	1	61	1.6%	3	17	17.6%
	White	30	538	5.6%	26	286	9.1%
	Total	**32**	**633**	5.1%	**33**	**325**	10.2%
2015	Am. Indian or Alaska Nat.	-	7	0.0%	-	1	0.0%
	Asian	-	7	0.0%	-	3	0.0%
	Black or African American	-	18	0.0%	-	19	0.0%
	Hispanic	-	5	0.0%	-	2	0.0%
	NA	1	59	1.7%	2	21	9.5%
	White	23	617	3.7%	20	335	6.0%
	Total	**24**	**713**	3.4%	**22**	**381**	5.8%
2016	Am. Indian or Alaska Nat.	-	7	0.0%	-	3	0.0%
	Asian	-	8	-	-	7	0.0%
	Black or African American	2	29	6.9%	3	36	8.3%
	Hispanic	-	6	0.0%	-	2	0.0%
	NA	-	48	0.0%	1	30	3.3%
	White	19	677	2.8%	23	368	6.3%
	Total	**21**	**775**	2.7%	**27**	**446**	6.1%
2017	Am. Indian or Alaska Nat.	2	6	33.3%	1	2	50.0%
	Asian	-	10	0.0%	-	5	0.0%
	Black or African American	2	17	11.8%	3	30	10.0%
	Hispanic	-	10	0.0%	-	6	0.0%
	NA	2	59	3.4%	-	26	0.0%
	White	16	630	2.5%	18	384	4.7%
	Total	**22**	**732**	3.0%	**22**	**453**	4.9%
	Four Year Totals	**99**	**2,853**	**3.5%**	**104**	**1,605**	**6.5%**

Note: Does not include loans for which no income was reported.

Source: Source: Consumer Financial Protection Bureau, accessed online at < https://www.consumerfinance.gov/data-research/hmda/explore>

Lower income applicants are more likely to receive a high-cost loan for the purchase of a home. This is unsurprising, considering these applicants are more likely to be considered a credit risk by banks, and unable to receive a more conventionally priced loan. The difference between the proportion of lower income and upper income persons receiving high-cost loans is small enough, that it is unlikely lower income applicants are being steered towards the high-cost loans; however, minorities are more likely to receive high-cost home purchase loans regardless of income. Over the four year period analyzed, each minority group did not receive high-cost loans each year, though when they did receive one, it was almost always at a greater rate than Whites, regardless of income. Minorities applied at such low rates that the results are not robust enough to reach any significant conclusions.

Figure 3-8 High Cost Home Refinance Loans by Race and Income, 2014 – 2017

		Upper Income			Lower Income		
		High-Cost	Total Originated	% High-Cost	High-Cost	Total Originations	% High-Cost
2014	Am. Indian or Alaska Nat.	1	4	25.0%	-	4	0.0%
	Asian	-	12	0.0%	-	3	0.0%
	Black or African American	2	36	5.6%	1	39	2.6%
	Hispanic	1	9	11.1%		6	0.0%
	NA	6	163	3.7%	1	109	0.9%
	White	33	1,055	3.1%	10	507	2.0%
	Total	**43**	**1,279**	3.4%	**12**	**668**	1.8%
2015	Am. Indian or Alaska Nat.	-	6	0.0%	-	1	0.0%
	Asian	-	8	0.0%	-	2	0.0%
	Black or African American	2	39	5.1%	2	48	4.2%
	Hispanic	1	4	25.0%	1	5	20.0%
	NA	6	159	3.8%	2	91	2.2%
	White	19	1,019	1.9%	14	596	2.3%
	Total	**28**	**1,235**	2.3%	**19**	**743**	2.6%
2016	Am. Indian or Alaska Nat.	-	6	0.0%	-	7	0.0%
	Asian	-	4	-	-	4	0.0%
	Black or African American	2	35	5.7%	-	31	0.0%
	Hispanic	1	16	6.3%	-	6	0.0%
	NA	2	173	1.2%	-	104	0.0%
	White	17	1,153	1.5%	21	638	3.3%
	Total	**22**	**1,387**	1.6%	**21**	**790**	2.7%
2017	Am. Indian or Alaska Nat.	-	-	-	-	4	0.0%
	Asian	-	6	0.0%	-	-	-
	Black or African American	1	24	4.2%	-	20	0.0%
	Hispanic	3	5	60.0%	-	3	0.0%
	NA	1	85	1.2%	2	68	2.9%
	White	19	719	2.6%	11	406	2.7%
	Total	**24**	**839**	2.9%	**13**	**501**	2.6%
	Four Year Totals	**117**	**4,740**	**2.5%**	**65**	**2,702**	**2.4%**

Note: Does not include loans for which no income was reported.

Source: Source: Consumer Financial Protection Bureau, accessed online at < https://www.consumerfinance.gov/data-research/hmda/explore>

This analysis also looks at high-cost lending among refinancing loans. A refinanced loan replaces an original mortgage and allows borrowers to take advantage of lower rates, switch from a variable to a fixed-rate mortgage, consolidate debt, and/or receive cash using the home's equity.

There was virtually no difference with the rate at which income groups refinanced with a high-cost loan. Similar to the home purchase loans, minorities did not consistently receive high-cost refinance loans like Whites. In years where they did receive high-cost loans, it was at a higher rate than Whites, though that is partially due to the small number of minorities receiving loans in the first place. Due to the small number of minority applications and originations, this analysis cannot conclude that there is loan discrimination taking place. The reasons behind a high rate of high-cost loans given to minorities versus Whites are likely the same as higher rates of rejection for minority applicants. Low credit scores, low incomes, and a lack of savings are all issues prevent minorities from obtaining and keeping homeownership at similar rates to Whites.

4. Assessment of Current Fair Housing Policies Programs and Activities

A. Progress since Previous AI – Public Sector Policies

a) Stark County

The following are potential impediments listed in the last AI for **Stark County**:

1. Stark County Regional Planning Commission's (SCRPC) requirement that proposed HOME projects gain evidence of support from residents within the projects' targeted neighborhood makes proposed affordable housing projects susceptible to defeat by not-in-my-backyard (NIMBY) attitudes.

2. SCRPC's entitlement grant planning documents could be improved from a fair housing standpoint.

3. SCRPC's HOME Policy and Compliance Manual could be improved from a fair housing standpoint.

4. It is unclear whether the Urban County currently provides adequate access to its growing foreign-language populations in the provision of its services.

5. Local units of government that participate in the Urban County's entitlement grant programs may not unequivocally understand their responsibility to affirmatively further fair housing choice.

6. Patterns of lending discrimination appear to exist.

Listed below are the action plans and subsequent actions undertaken for **Stark County**:

1. **Action Plan** – Amend the Consolidated Plan to include a definition for areas of minority concentration. Carry the definition through to Annual Plans.
   Action Undertaken – This action was completed. The Consolidated Plan was amended to include a definition for areas of minority. Page 105 reads as follows: *Concentration of racial or ethnic minorities is defined as 22-45% of total households.*
   Action Needed – The comparison should be "residents" rather than households.

2. **Action Plan** – Amend the HOME application and program guidelines to remove the requirement that proposed projects gain evidence of support from residents within the project's targeted neighborhood.
   Action Undertaken – This action was completed.

3. **Action Plan** – Conduct the four-factor analysis to determine the extent to which the translation of vital documents is necessary.
   Action Undertaken – The department is assessing the need to see if printed documents are necessary so the foreign-language population could easily read and understand.
   Action Need – This recommendation should be carried forward.

4. **Action Plan** – Update the HOME Policy and Compliance Manual to expand upon its affirmative marketing requirements. Specifically, state what actions are required on the part of owners, developers or sponsors and what corrective actions will be taken in the event of noncompliance.
   Action Undertaken – This action was completed. The staff updated the HOME Policy Manual to include the following language on page 20: *Owners must adhere to Equal Housing Opportunity, Affirmative Marketing and Fair Housing practices in all marketing efforts, eligibility determinations and other transactions. Owners must solicit applications from persons in the housing market not likely to apply without special outreach efforts including the minority and LEP (Limited English Proficiency) populations. All marketing efforts must be documented.*
   Action Needed – The County must identify what corrective actions will be taken for non-compliance.

5. **Action Plan** – Update the HOME Policy and Compliance Manual to include a site selection policy that encompasses the requirements at 24 CFR 983.6.
   Action Undertaken – There have not been any funded projects with 5+ units. If projects of that size are funded in the future, a checklist in the form of a worksheet will be created for the purpose of including a site selection policy that encompasses the requirements at 24 CFR 983.6. That worksheet will be part of the application packet for applicants requesting HOME funds for 5+ units.

6. **Action Plan** – Expand incentives for property owners and investors to build new apartment buildings or substantially rehabilitate existing buildings for occupancy by lower-income families.
   Action Undertaken – The staff continue to keep all options and discussions open for incentives that are beneficial for property owners and investors and at the same time feasible under our programs.

7. **Action Plan** – Provide technical land use planning assistance to local units of government aimed at identifying and overcoming procedural and regulatory barriers to affordable housing and fair housing.
   Action Undertaken – In the past, the staff conducted presentations at township zoning meetings and at the Governmental Law Seminar where local governmental officials from around the county attended. Staff will continue to be available for such speaking engagements.

8. **Action Plan –** Establish a policy of refusing to grant CDBG or HOME funds to municipalities that the SCRPC determines are engaging in unlawful housing discrimination through local regulations.
   Action Undertaken – This action was completed. The application was amended to permit the staff to work with municipalities in regards to appropriate languages in ordinances.

9. **Action Plan –** Promote the use of model ordinances, especially as they relate to the removal of barriers to affordable housing and accommodating group homes for persons with disabilities.
   Action Undertaken – During presentations, the staff continued to promote model ordinances and educate local officials at the Governmental Law Seminar and zoning inspection meetings.

10. **Action Plan –** Establish a policy to require that all entitlement funding recipients certify that they will affirmatively further fair housing.
    Action Undertaken – This action was completed. A disclaimer was included in the Requalification Documents and Cooperative Agreements with the cities and villages. A

disclaimer in the funding agreements with sub-recipients was included in FY 2015, which stated: *We certify that we will affirmatively further fair housing.*

11. **Action Plan** – Arrange housing counselors to provide credit repair advice to ensure that members of the protected classes have access to means of improving their ability to obtain and maintain decent, affordable housing.
    Action Undertaken – The agency currently does not have a down payment assistance program. However, the agency provided online credit counseling vouchers from Community Building Partnership to purchasers of the NSP Program, while that program was ongoing.

12. **Action Plan** – Continue educational and outreach efforts to broaden awareness of rights and responsibilities under the Fair Housing Act.
    Action Undertaken – The Fair Housing Office continued to conduct workshops, conferences, and/or seminars to increase the awareness of fair housing. In addition, the staff continued its one-on-one counseling to tenants, landlords, property managers, and representatives from social service agencies to increase their knowledge on the fair housing and landlord-tenant laws.
    Action Needed – The Fair Housing Office should continue its education and outreach initiatives.

b) City of Alliance

The following are potential impediments listed in the previous AI for the City of **Alliance**:

1. Due to the arrangement by which entitlement funds are allocated and the limited availability of resources, the City's ability to use entitlement funds to create new housing opportunities in non-impacted areas is somewhat limited.

2. There are an estimated 318 persons with limited English proficiency in Alliance. Among the Spanish speaking population in the City, 47.4% speak English less than "very well." It is unclear whether this population has adequate access to city programs and services.

3. The City has not established an Affirmative Marketing Policy.

4. The City's appointed public boards relating to housing issues are not demographically representative of the community at large.

5. The Comprehensive Land Use Plan and the City's zoning ordinance discourage the development of multi-family rental housing.

6. The zoning ordinance places undue restrictions on the location of group homes for persons with disabilities, a policy that is inconsistent with the provisions of the Fair Housing Act.

Listed below are the action plans and subsequent actions undertaken for the ity of **Alliance**:

1. **Action Plan** – Allocate CDBG funding to enhance and revitalize LMI areas and improve the existing housing stock.
   Action Undertaken – The City allocated CDBG funding for the acquisition and rehabilitation of single-family housing for low-to-moderate income families. Funding is allocated to a local non-profit organization and over the period of one fiscal year, an eligible residence is selected and the unit is rehabbed in order to provide housing opportunities for an eligible resident. The City

continued to allocate the funding to provide new housing opportunities to residents throughout the planned action years.
Action Needed – Alliance should continue this initiative.

2. **Action Plan** – Conduct the four-factor analysis to determine the extent to which the translation of vital documents is necessary to assist persons with limited English proficiency in accessing city programs and services.
Action Undertaken – The department is assessing the need to see if printed documents are necessary so the foreign-language population could easily read and understand documents that would provide access to services and programs.
Action Needed – Alliance should complete the four factor process and determine what measures are needed.

3. **Action Plan –** Draft and adopt an Affirmative Marketing Policy per HUD regulations for all housing developments of five or more units that are assisted by any City funds.
Action Undertaken – This action was completed. The City established an Affirmative Marketing Policy in which the staff monitors its progress. The policy is as follows: "Developers, owners, and grantees must market housing opportunities to all persons in the housing market, including groups that are not likely to apply without special outreach efforts, including the minority and LEP populations. All marketing efforts must be documented with sufficient records maintained by the issuer. The use of the Fair Housing logo or phrase must be included on all signage and marketing documents pertaining to rental and housing opportunities. Where there are five (5) or more units, developers, owners and grantees must adhere to Affirmative Marketing and Fair Housing practices in all marketing endeavors, eligibility determinations and other transactions. Failure to comply with the Affirmative Marketing Policy may result in the denial or dismissal of allocated CDBG funding."

4. **Action Plan** – Recruit and involve qualified members of the protected classes in community leadership as it relates to housing issues. Alternately, assemble an additional, more representative board to advise on matters related to housing policy.
Action Undertaken – The City Administration is actively seeking qualified members of protected classes to sit on the Zoning Board and other housing-related boards and committees so they may be better representative of serve the community at large.
Action Needed – Alliance should continue to seek out members of the protected classes to serve on its appointed boards and commissions.

5. **Action Plan** – Initiate a review of the zoning ordinance and Comprehensive Land Use Plan with the goal of removing obstacles to the creation of affordable housing.
Action Undertaken – The staff will review the zoning ordinance and Comprehensive Land Use Plan to remove any barriers that are inconsistent to the Fair Housing Law.
Action Needed – Alliance should amend its zoning ordinance to make the definition of "family" and the definition and regulation of group homes consistent with fair housing law.

6. **Action Plan** – Amend the zoning ordinance to allow group homes for person with disabilities to locate and function under the same rules that govern single-family dwelling units.
Action Undertaken – The staff will review and suggest amendments to the zoning ordinance so group homes will be permitted to locate in areas of the city as not to impede the housing choices for persons with disabilities and so they can function under the same rules that govern

single-family dwelling units. Staff will work to remove any barriers that are inconsistent to the Fair Housing Act.

7. **Action Plan –** Continue to provide fair housing education and outreach efforts to landlords, building owners, rental agents, and Realtors.
   Action Undertaken – The fair housing office continued to accomplish this goal by sponsoring trainings, presentations, and workshops. In addition, the staff continued to counsel tenants, landlords, students, and representatives from social service agencies to increase their knowledge on the fair housing and landlord-tenant laws.
   Action needed – Alliance should continue to provide fair housing education and outreach.

c) City of Canton

The following are potential impediments listed in the previous AI for the City of **Canton**:

1. The Southeast area of the City, which consists nearly exclusively of areas of Black concentration, is becoming increasingly isolated from amenities and services.

2. It is unclear whether the City currently provides adequate access of information and services to its growing foreign-language populations.

3. The City's affirmative marketing policy could be broadened to further ensure that City-supported affordable housing opportunities are made available to members of the protected classes.

4. The amount of land available and zoned for the development of multifamily housing in Canton is limited.

5. The zoning ordinance places undue restrictions on the location of group homes for persons with disabilities, a policy that is inconsistent with the provisions of the Fair Housing Act.

6. Some improvements could be made to City policy documents, from a fair housing perspective.

Listed below are the action plans and subsequent actions undertaken for the city of **Canton**:

1. **Action Plan –** The City should continue to invest CDBG funds and other available resources in the revitalization of these areas, with a goal of targeting economic development in the most viable neighborhoods. In order to mitigate segregation, the City should increase efforts to provide Black residents of Southeast Canton with access to housing opportunities in non-concentrated areas within and beyond the City. The current lack of nearby jobs and amenities requires residents to travel to meet basic needs. The City should continue to work with Stark Area Regional Transportation Authority (SARTA) to evaluate the adequacy of public transit service for residents of Canton's Southeast area and advise SARTA on improvements that would more fully connect residents to opportunities in other neighborhoods.
   Action Undertaken—The City has directed CDBG and grant money totaling over $1.6 million towards programs that aim to improve health, opportunities, and the housing stock in this part of the City. The City has also worked to rehabilitate and construct new housing units in impacted areas, while providing funding to Habitat for Humanity for the construction of new homes for

low- to moderate- income families outside impacted areas. The City has worked with the Stark County Regional Transit Authority (SARTA) to maintain public transit opportunities that serve protected classes and provide transit access outside of impacted areas.
Action Needed – The City should continue this policy.

2. **Action Plan –** To determine what language assistance accommodations will need to be made, the City can complete a four-factor analysis and implementation plan (Language Access Plan) following HUD's LEP guidance. If it is determined that a need for an LAP exists, the City must prepare the LAP to comply with Title VI of the Civil Rights Act of 1964. This analysis could be completed on a regional basis and coordinated by SCRPC.
   Action Undertaken – The City has adopted a language access plan and partnered with groups that can provide oral and written translation services to its growing Spanish-speaking population. Vital documents related to fair housing have been translated, and the City continues to assess the foreign language population's needs so that it can continue translating vital documents. The City has also conducted outreach towards this population, so they are aware of City programs and services.

3. **Action Plan –** Amend the Affirmative Marketing Policy to apply to all City-supported housing projects with five or more units, including CDBG investments as well as those funded through HOME and other City funds. Amend the Policy to address outreach to persons with limited English proficiency.
   Action Undertaken – The Affirmative Marketing Policy has been revised to make it clear that all housing units offered for sale or rent and federally funded must follow the AMP. The City will propose changes to include projects with 5 or more units that are city –supported (non-federally funded) to follow the AMP.

4. **Action Plan –** Amend the zoning ordinance and map and the City's future land use plans to ensure that opportunities are provided for the development and redevelopment of affordable housing, particularly multi-family rental units.
   Action Undertaken – The City is working with stakeholders to determine the best areas for multi-family housing. The City Administration, City Council, and the Planning Commission is working together to establish additional opportunities for development or redevelopment of multifamily housing.
   Action Needed – The City should continue this initiative.

5. **Action Plan –** Amend the zoning ordinance to allow group homes for persons with disabilities to locate and function under the same rules that govern single-family dwelling units. Additionally, amend the ordinance to replace outdated terminology.
   Action Undertaken – The definition of family has been updated in the City code in a manner which resolves the concerns of the impediment. A review has been conducted of the language in fair housing rules and zoning ordinances, and improper or discriminatory language has been replaced. A further review of ordinances and regulations will be conducted to determine if there is any additional need for updated terms.
   Action Needed – The City should continue to monitor the need for further progress.

d) City of Massillon

The following are potential impediments listed in the previous AI for the City of **Massillon**:

1. Due to the arrangement by which entitlement funds are allocated in the City of Massillon and Stark County and the limited availability of resources, the City's ability to use entitlement funds to create new housing opportunities in non-impacted areas is somewhat limited.

2. Due to the age and limited scope of the Future Land Use Plan, the City lacks a comprehensive housing policy document.

3. The City's zoning ordinance should be amended to expand opportunities for the development of affordable housing and to eliminate inconsistencies with the Fair Housing Act.

4. The City has not established an affirmative marketing policy.

Listed below are the action plans and subsequent actions undertaken for the City of **Massillon**:

1. **Action Plan –** Amend the Consolidated Plan to include a specific definition of areas of minority concentration, carrying the definition through future Annual Action Plans. Continue to invest CDBG funds in ways that enhance and revitalize LMI areas and preserve and improve the existing housing stock. Work closely with the Stark County Regional Planning Commission to identify new HOME affordable rental housing project sites outside of impacted areas.
   Action Undertaken – The City is working closely with the regional planning commission to identify new HOME housing projects outside of impacted areas, however, since many agencies have downsized, the ability to adequately monitor needs to be addressed.
   Action Needed – Massillon should continue to be open to new affordable housing developments outside of impacted areas.

2. **Action Plan –** Evaluate the feasibility of undertaking a comprehensive plan for the City of Massillon. Should resources allow for the development of a new plan, the City should include a statement to encompass its fair housing aims and ensure that the intent and effect of the housing policies established are consistent with that statement.
   Action Undertaken – The City has a comprehensive housing policy with supporting documentation and is currently utilizing this policy to develop and implement its housing policy.

3. **Action Plan –** Update the zoning ordinance accordingly.
   Action Undertaken – The City has updated all of its forms to reflect the correct protected classes.
   Action Needed – The City should amend its zoning ordinance to be consistent with fair housing law.

4. **Action Plan –** Draft and adopt an affirmative marketing policy per HUD regulations.
   Action Undertaken – During PY2012, as part of the City Action to impediment #2 the City developed an affirmative marketing policy as part of its proposed housing department comprehensive plan. The City is continuing to develop and complete this process. Massillon's Fair Housing Department has established an Affirmative Fair Housing Marketing Plan, and

presented its endeavors during the AFFH Compliance Review conducted by HUD in February 2016.

e) ACMS Consortium

Potential impediments and action plans were identified in the AI for the entire **ACMS Consortium**. They included the following:

The following are impediments listed in the last AI for Stark Metropolitan Housing Authority.

Potential Impediments

1. There is an undersupply of public housing units accessible to persons with disabilities.

2. The Housing Authority's policies could be improved from a fair housing perspective.

3. The volume and outcomes of fair housing complaints filed at both the local and federal levels indicate that unlawful discrimination still occurs in Stark County, especially in the rental market.

4. Preferences for particular family types were detected among the various real estate advertising outlets reviewed for the AI, suggesting that local newspapers could improve their screening processes related to potential housing discrimination.

Action Plan

1. **Action Plan –** Stark Metro Housing Authority (SMHA) should proceed to create accessible public housing units in accordance with the voluntary compliance agreement, with UFAS thresholds serving as a minimum.
   Action Undertaken –Pursuant to the Voluntary Compliance Agreement, SMHA must complete the construction or conversion of 128 UFAS Accessible Units for individuals with mobility impairments and fifty-one UFAS Accessible Units for individuals with hearing or vision impairments. SMHA has seventy-eight remaining UFAS units to complete. The HUD Cleveland Field Office has proposed that SMHA will face a ten year off-set to its Capital Fund pursuant to a Repayment Agreement to be entered by and between SMHA and HUD as a result of the July 15, 2013 Office of Inspector General findings.

   In light of the significant off-set to its Capital Fund, SMHA will not be in the position to complete UFAS modifications to seventy-eight units in addition to maintaining the current multitude of Reasonable Modification requests. The deadline for completion was July 2013. HUD extended the term of the VCA for 3 years and 8 months from June 2015, allowing SMHA until February 2019 to satisfy the remaining provisions of the VCA. With the anticipated off-set of Capital Funds, it is projected SMHA will not be able to complete the remaining seventy-eight units needed for SMHA's compliance with the VCA by February 2019. Currently, SMHA has a pending request before HUD for a written agreement to extend the time to complete the remaining terms of the VCA as they relate to the UFAS renovations to February 2028.

   Action Needed – SMHA should continue to meet the terms of the extended VCA.

2. **Action Plan –** Add provisions to the SMHA affirmative marketing policy to reach traditionally underserved persons.
   Action Undertaken – The SMHA is working towards this.

3. **Action Plan –** Add a formal statement to the Administrative Plan Policy that SMHA will seek exception rents of up to 130% FMR on a case-by-case basis to ensure that persons with disabilities can access decent, affordable housing.
   Action Undertaken – The SMHA revised the Administrative Plan to address this action plan.

4. **Action Plan –** Continue to invest in landlord outreach, education and testing in order to broaden understanding of rights and responsibilities under the Fair Housing Act. These actions are potentially most effective executed on a regional basis.
   Action Undertaken – The staff continues to provide outreach, education, trainings, testing, presentations, and workshops in an effort to affirmatively further fair housing and to increase awareness of the fair housing law.

B. Progress since Previous AI – Private Sector Policies

The previous AI showed there were patterns of subprime lending in the region. It suggested the public sector provide access to credit counseling services in order to help low- to moderate-income persons establish or restore credit, and enhance their ability to access fair housing. The City of Canton was the only entity to report partnering with private for-profit and non-profit organizations to reach out to residents and provide counseling services with mixed results in participation.

C. Current Fair Housing Programs and Activities

a) Stark County

Stark County's fair housing programs are operated by Stark County Regional Planning Commission (SCRPC). SCRPC has a full-time Fair Housing Director and provides counseling on tenant-landlord rights and fair housing laws, processes and investigates discrimination claims, sponsors educational workshops and seminars, monitors discrimination compliance, and produces fair housing literature. SCRPC is also responsible for receiving and investigating fair housing complaints in Stark County, and the Commission will file complaints with HUD when necessary.

SCRPC designated April as Fair Housing Month where staff and board members all receive fair housing related training. It is recommended that this training be expanded to staff countywide. Countywide staff training will allow more employees to identify discriminatory housing practices and connect affected individuals to resources.

b) City of Alliance

The City of Alliance contracts with the Stark County Regional Planning Commission (SCRPC) to oversee its fair housing programs. SCRPC provides counseling on tenant-landlord rights and fair housing laws, processes and investigates discrimination claims, sponsors educational workshops and seminars, monitors discrimination compliance, and produces fair housing literature. The City distributes this literature to individuals, landlords, and organizations such as the Alliance Police Department, the Mayor's Office, and the Departments of Code Enforcement, Health, and Planning and Development.

The City works to identify sites and programs that will expand homeownership to members of the protected classes outside of racially/ethnically concentrated areas. The previous AI recommended using mapping tools, so the City could better track the locations of CDBG and HOME funded projects. The City is currently in talks with the Stark County GIS mapping center to create templates that will allow funds tracking maps to easily be created.

c) City of Canton

Fair Housing Office employees have attended public events to make residents aware of Fair Housing requirements as well as services available from public and private agencies. A lack of awareness of available services continues to be an obstacle the City seeks to overcome by providing information through a variety of formats, such as legal ads, newspaper articles, the City's website, pamphlets, talk shows, etc.

Canton has also increased advertising and outreach to the community since the last AI. This has driven an increase in fair housing complaints during this period, which is an indicator that outreach efforts are successful.

d) City of Massillon

The City of Massillon operates its Fair Housing Program designed to improve and promote housing opportunities in Massillon. The City participates in a variety of activities which include education and outreach, and the evaluation, monitoring and administration of fair housing laws.

The City receives approximately 30 to 50 calls or visits per month regarding landlord-tenant and fair housing issues. Many of them are requesting information on fair housing law. There is also a focus on reasonable accommodation issues to protect disabled persons from being taken advantage of by landlords who promise accommodations, but do not follow through with promises. The City is monitoring newspaper ads for any implied discrimination. The City also checks the local newspaper for questionable advertisements in the real estate section that imply discrimination. The City also places ads in the paper to raise awareness of its presence as Fair Housing Advocates, which allows the community to know that they have a right to Fair Housing, and can use various City resources to ensure that right.

The City's Fair Housing Coordinator participates in outreach to the community and has attended question and answer sessions with the public. Some stakeholders in Massillon have spoken about programs that would have worked better if there had been community outreach conducted specifically to gather input prior to implementation. It is recommended that fair housing programs should be planned using community input in order to maximize their effectiveness.

The City's Fair Housing Board also meets twice yearly, and holds update meetings as issues related to fair housing arise. The Board consists of active leaders in the community, concerned citizens, the Housing Director, Community Development Director and Administrative Assistant.

5. Stark Metropolitan Housing Authority

Stark Metropolitan Housing Authority (SMHA) is the regional housing authority for all of Stark County. SMHA manages the public housing and Section 8 Housing Choice Voucher programs that serve the cities of Alliance, Canton and Massillon and the Urban County. SMHA has offices in all three cities.

A. Public Housing

a) Inventory

SMHA owns and operates 2,427 public housing units. Sizes range from efficiency apartments to 5 bedroom homes, and the age ranges from units built in the late 1800s up to units constructed recently. Most were built in the 1970s and 1980s. Over two-thirds of SMHA's inventory is in Canton, which has the County's highest concentration of public service, transit, and other amenities. The public housing inventory is operated in a variety of locations outside of Canton as well. Most of the other sites are in Massillon and Alliance, however, SMHA has 201 units or 8.1% of its total inventory in the Urban County as well.

Figure 5-1 SMHA Public Housing Developments

Development	Units	Year	Location
W.L. Hart Apartments	105	1975	Alliance
Garfield Homes	16	1975	Alliance
Pike-Mahoning	39	1974	Alliance
Scattered Sites	123	1900 - 1990	Alliance
Total Units	**283**	**Alliance**	
McKinley Townhomes	12	1980	Canton
Gage Gardens	54	1971	Canton
Mahoning Manner	82	1971	Canton
Scattered Sites	279	1920 - 1983	Canton
Linwood Acres	112	1975	Canton
Girard Gardens	100	1969	Canton
Jackson-Sherrick	326	1965 - 1980	Canton
Sunset Homes	14	1970	Canton
Ellisdale Homes	141	1972	Canton
Leshdale Homes	62	1973	Canton
McKinley Park Apartments	81	1967	Canton
Turner Towers	134	1970	Canton
Roselane Gardens	19	1970	Canton
Kimberle Gardens	31	1970	Canton
Neal Court	19	1974	Canton
Plaza Terrace	100	1973	Canton
Shortridge Villa	40	1982	Canton
Total Units	**1,606**	**Canton**	
Franklin Homes	37	1973	Massillon
Lowry Price Homes	30	1980	Massillon
Spring Hill Gardens	8	1979	Massillon
Underhil Gardens	35	1973	Massillon
Willow Homes	28	1971 - 1973	Massillon
Lincoln Apartments	105	1973	Massillon
Witmer Arms	25	1981	Massillon
Scattered Sites	69	1881 - 1982	Massillon
Total Units	**337**	**Massillon**	
Reynolds Manner	40	1982	Urban County
Scattered Sites	78	1950 - 1983	Urban County
Constitution Hall	43	1982	Urban County
Indian Run Manor	25	1981	Urban County
Indian Run Townhomes	15	1981	Urban County
Total Units	**201**	**Urban County**	
Total Units	**2,427**	**Stark County**	

Source: SMHA

SMHA public housing currently provides units for 425 elderly (older than 62 years of age) persons and 407 families with at least one disabled family member. There are 50 requests for accessibility features to be installed in public housing units. Public housing occupants are equally White (48%) and Black (46%). SMHA staff members reported no discernible patterns of concentrations by race or ethnicity in the Authority's public housing developments.

b) Accessibility

Section 504 of the Rehabilitation Act of 1973 and 24 CFR Part 8 requires that 5% of all public housing units be accessible to persons with mobility impairments. Another 2% of public housing units must be accessible to persons with sensory impairments. In addition, an Authority's administrative offices, application offices and other non-residential facilities must be accessible to persons with disabilities.

The Uniform Federal Accessibility Standards (UFAS) is the standard against which residential and non-residential spaces are judged to be accessible.

SMHA has seen an uptick of disabled applicants with various accessibility needs on its public housing waiting list. The Authority entered into a Voluntary Compliance Agreement (VCA) which has identified that the Authority needs to complete the conversion or construction of 128 UFAS compliant units for individuals with mobility impairments and 51 UFAS compliant units for individuals with hearing or vision impairments in order to meet its applicants' needs. It is SMHA's goal to renovate 51 UFAS compliant units for individuals with hearing, vision, and mobility needs as part of its goal to comply with the VCA.

c) Waiting List

SMHA maintains 7 separate semi-jurisdictional waiting lists for public housing units throughout Stark County. The combined total number of households on all 7 waiting lists in 2018 was 9,992 households. About 55% of households on the waiting list were families with children, and 17% of households included at least one member with a disability. Only 3.3% of households were classified as elderly households. The majority of households on the waiting list were White (54.3%) followed by Black households at 42.4%.

B. Section 8 Housing Voucher Choice Program

In addition to the public housing units, the Authority administers 1,481 Housing Choice Vouchers (HCV), all in the form of tenant-based rental assistance. Currently, SMHA's payment standard is at or above the HUD-determined local fair market rent depending on the recipient's income. This rate is up from 95% of FMR provided to voucher holders during the previous AI due to SMHA's desire to expand living opportunities to voucher holders. A majority of the voucher holders are Black (53%), while Whites made up 43% of voucher holders.

Landlords may associate voucher recipients with a variety of problems related to low-income tenants, such as late or non-payment of rent and crime. This can create additional barriers to recipients looking to move outside of traditional low-income neighborhoods. Because a majority of voucher holders in Stark County are Black, they can face additional barriers due to racial discrimination. SMHA should continue to work with landlords, so vouchers provide a wide variety of housing choice around the County, not only in impacted areas.

a) Inventory

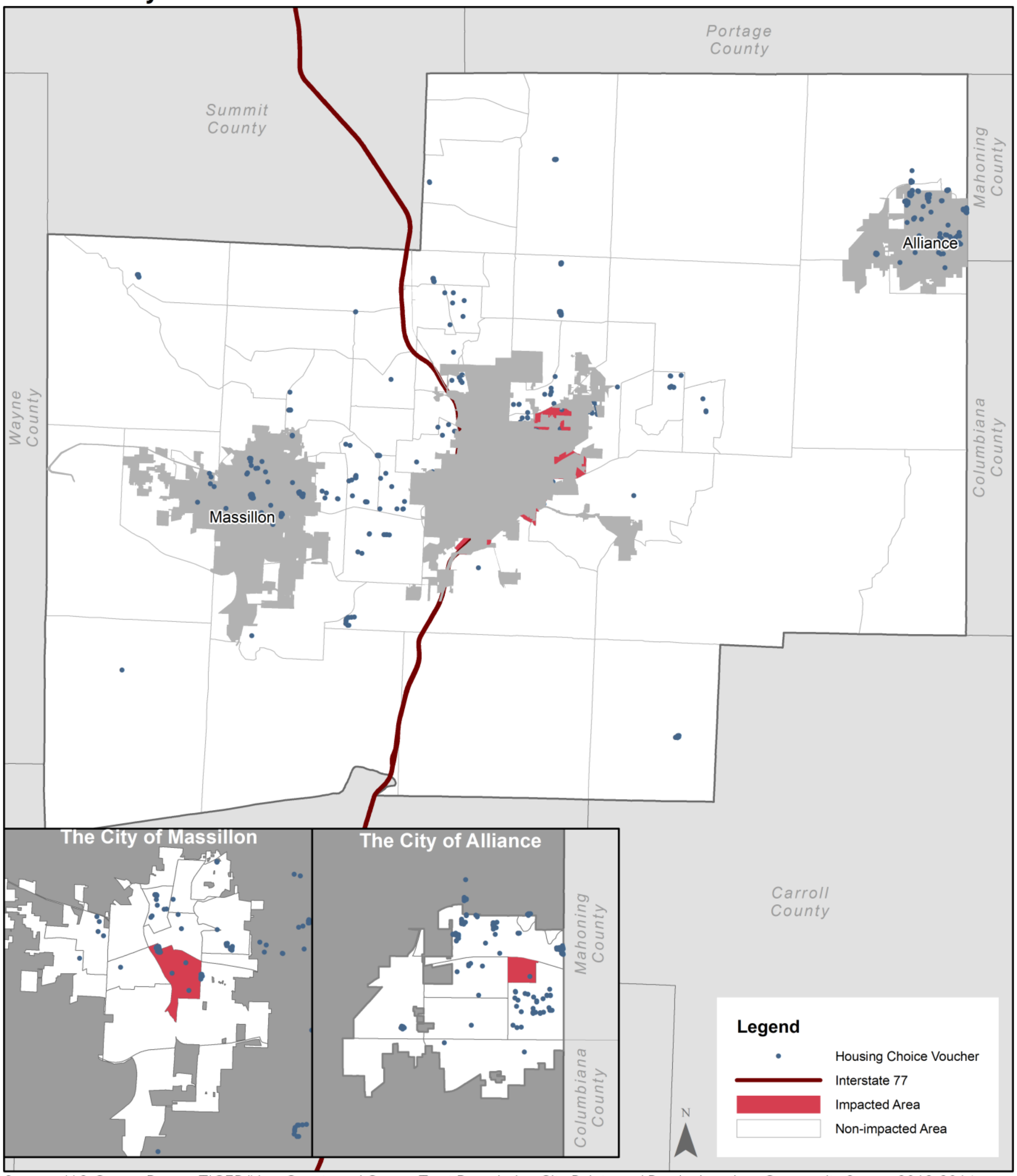
As illustrated in Maps 6 and 6A, SMHA's voucher inventory is dispersed primarily outside of Canton and Massillon. These are mostly outside of impacted areas and appear to provide choice in location for voucher holders; however, the majority of vouchers are inside the urban centers of the County. The majority of voucher locations in Alliance are in neighborhoods of LMI concentration, but outside of the impacted census tract where there is overlapping racial and LMI concentrations. In Massillon there is a cluster where vouchers are located in an area of racial and LMI concentration. The remaining mostly spread throughout the remaining northern half of the City. Most of the voucher holders located in Canton are outside of the southeast, though there are a few clusters in the impacted. Generally, vouchers in Canton are clustered nearby each other, likely due to landlords holding a large number of units that are willing to accept vouchers. SMHA should work with landlords to improve the number of options available to voucher holders outside of these two areas.

b) Waiting List

The Section 8 Housing Choice Vouchers (HCV) program had 1,576 applicants on the waiting list for vouchers in 2018. Demand was so high compared to the supply of available vouchers that SMHA decided to close the waiting list until further notice. It is SMHA policy to close the list when the estimated waiting period reaches 36 months. On the waiting list, families with children comprised 76.8% of households, and 15.6% of households included at least one family member with a disability. Only 2.5% of households were classified as elderly households. The majority of HCV households on the waiting list were Black (69.1%) compared of White households on the list (28%).

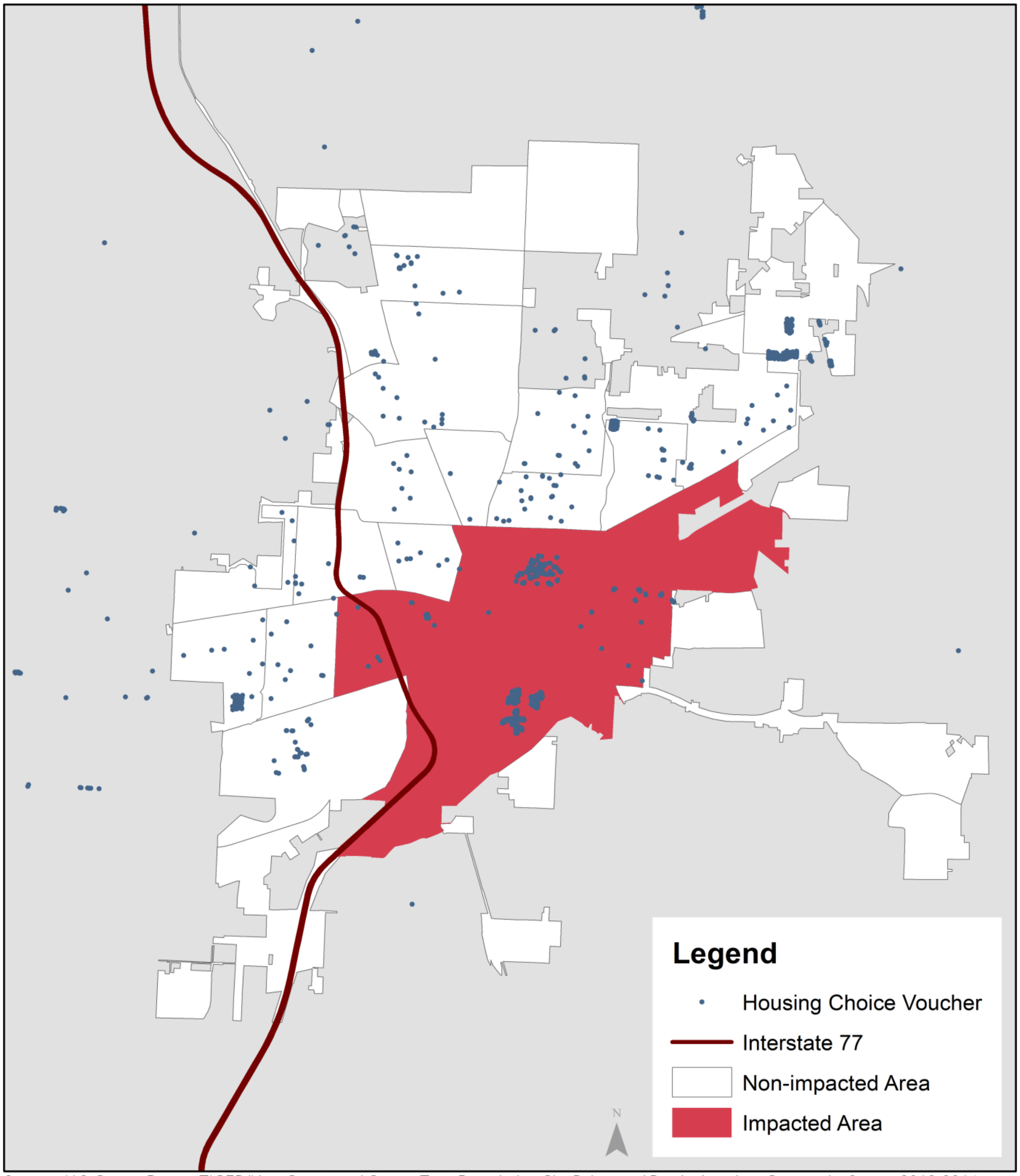
MAP 6: HOME CONSORTIUM HOUSING CHOICE VOUCHERS, 2016

The cities of Alliance and Massillon join with Stark County to form the HOME Consortium, while the City of Canton is not a member.



Sources: U.S. Census Bureau TIGER/Line: County and Census Tract Boundaries, City Points, and Roads; American Community Survey, 2012-2016 5-Year Estimates: Race & Ethnicity, LMI Data; SMHA

MAP 6A: CITY OF CANTON HOUSING CHOICE VOUCHERS, 2016



Sources: U.S. Census Bureau TIGER/Line: County and Census Tract Boundaries, City Points, and Roads; American Community Survey, 2012-2016; 5-Year Estimates: Race & Ethnicity, LMI Data; SMHA

6. Regional Considerations

A. Evidence of Housing Discrimination

This section provides a review of fair housing complaints or compliance reviews where a charge of a finding of discrimination has been made. Additionally, this section will review the existence of any fair housing discrimination suits filed by the United States Department of Justice or private plaintiffs in addition to the identification of other fair housing concerns or problems.

A lack of filed complaints does not necessarily indicate a lack of housing discrimination. Some persons may not file complaints because they are not aware of how to go about filing a complaint or where to go to file a complaint. In a tight rental market, tenants avoid confrontations with prospective landlords. Discriminatory practices can be subtle and may not be detected by someone who does not have the benefit of comparing his treatment with that of another home seeker. Other times, persons may be aware that they are being discriminated against, but they may not be aware that the discrimination is against the law and that there are legal remedies to address the discrimination. Finally, households may be more interested in achieving their first priority of finding decent housing and may prefer to avoid going through the process of filing a complaint and following through with it. Therefore, education, information, and referral regarding fair housing issues remain critical to equip persons with the ability to reduce impediments.

The Office of Fair Housing and Equal Opportunity (FHEO) at HUD processes complaints from persons regarding alleged violations of the Fair Housing Act. From 2014 to 2018 there were 126 complaints. As of September 2018, four of these complaints were still under investigation. The rate of fair housing complaints in Stark County over this time period was 33.6 per 100,000 people. This rate is up from 17.2 complaints per 100,000 people from 2005 to 2010.

Figure 6-1 Fair Housing Complaints 2014 - 2018

Disability	54	42.9%
Race	35	27.8%
Sex	21	16.7%
Familial Status	11	8.7%
National Origin	2	1.6%
Unknown	2	1.6%
Religion	1	0.8%
Total	**126**	**100.0%**

Source: U.S. Department of Housing and Urban Development
Note: Location of complaint was not given, so analysis can only be conducted at the county level.

Nearly half of all complaints were disability related and over a fourth of cases were due to race. Disability, race, and sex complaints comprised 87.3% of complaints received from Stark County. Of the 126 fair housing complaints, 53 (42.1%) were successfully conciliated. Another 25 (19.8%) were found to have no probable cause and 13 (10.3%) were dismissed due to a lack of jurisdiction. Only one of the cases were found to have probable cause due steering. The result of the trial is unkown.

a) Complaints filed with Stark County Fair Housing Office

The Stark County Regional Planning Commission (SCRPC) administers fair housing programs that include the receipt and investigation of fair housing complaints across the Urban County and in the City of Alliance. Cases that cannot be dismissed or resolved at the local level are referred to OCRC or HUD. In addition to enforcement duties, SCRPC has a full-time Fair Housing Director and provides counseling on tenant-landlord rights and fair housing laws, sponsors educational workshops and seminars, monitors discrimination compliance and produces fair housing literature.

The OCRC received and oversaw 27 cases from the SCRPC from 2012 to 2018. Of those cases, 11 (40.7%) involved disabilities and 7 (25.9%) involved race. A total of 9 (33.3%) cases were found to be without probable cause and 7 (25.9%) were dismissed due to a lack of jurisdiction. There were 4 cases withdrawn and 3 of those cases involved benefits being received by the complaining party. There are still 5 open cases as of September 2018.

b) Complaints filed with Canton Fair Housing Office

There were 126 complaints filed with the Canton Fair Housing Office from July 2007 to August 2018. Of those cases 54 (42.9%) were filed due to disabilities. Race was the second largest reason with 35 complaints (27.8%). A total of 53 (42%) cases ended in conciliation and 25 (19.8%) cases were found to have no probable cause. Only one complaint was found to have probable cause and there are still four complaints that are under investigation.

c) Discrimination Conclusions

The sharp increase could be due to robust fair housing activities taking place in the County, which helps keep residents informed of their rights leading to more complaints. The increase is also evidence that landlords continue to require training and knowledge of their responsibilities to provide fair housing. In areas with a landlord registry, landlords could be required to attend fair housing training before being officially registered. A yearly refresher course would then keep those landlords up-to-date on how to avoid even perceived discriminatory behavior.

B. Tax Rates

Taxes impact housing affordability. While not an impediment to fair housing choice, real estate taxes can impact the choice that households make with regard to where to live. Tax increases can be burdensome to low-income homeowners, and increases are usually passed on to renters through rent increases. Tax rates for specific districts and the assessed value of all properties are the two major calculations used to determine revenues collected by a jurisdiction. Determining a jurisdiction's relative housing affordability, in part, can be accomplished using tax rates.

However, a straight comparison of tax rates to determine whether a property is affordable or unaffordable gives an incomplete and unrealistic picture of property taxes. Local governments with higher property tax rates, for example, may have higher rates because the assessed values of properties in the community are low, resulting in a fairly low tax bill for any given property. In all of the communities surrounding a jurisdiction, comparable rates for various classes of property (residential, commercial, industrial, etc.) are assigned to balance each community's unique set of resources and needs. These factors and others beyond the municipality's control and must be considered when performing tax rate comparisons.

The State of Ohio requires its counties to conduct countywide reappraisals of property every six years and to update values every third year after evaluation. This can result in higher or lower property taxes for residents, which can lead to a change in revenue for the county. The most recent reappraisal for Stark County was conducted in the summer of 2018. Using 2016 Census data on home values and 2016 tax rates, an analysis can be conducted to determine the median annual tax required explicitly by homeowners and implicitly by renters (though landlords in many cases are able to spread costs out across several renters).

Figure 6-2 Effective Tax Rates by Taxing District, 2016

Municipality	Taxing District	Effective Millage Rate	Median Home Value in Municipality 2016	Median Tax Payment
Alliance	Alliance CSD	50.281153	$79,600	$1,400.83
	Marlington LSD	39.292403		$1,094.69
Canton	Canton CSD	71.43996	$71,000	$1,775.28
	Canton LSD	51.97239		$1,291.51
	Plain LSD	52.414932		$1,302.51
	Louisville CSD	52.945891		$1,315.71
Massillon	Tuslaw CSD	47.444058	$98,700	$1,638.95
	Fairless LSD	50.288066		$1,737.20
	Massillon CSD	67.070743		$2,316.96
	Perry LSD	48.842038		$1,687.25
	Jackson LSD	50.296221		$1,737.48

Source: Stark County Auditor's Office, Calculations by Mullin & Lonergan Associates

Massillon CSD has the highest median yearly tax payment at $2,316.96 while the Marlington LSD in Alliance is lowest at $1,094.69. On average the tax rate has increased by 13.7% since 2009 in the three entitlement cities' tax districts. The Canton CSD increased the most at 40.9%, and the Jackson LSD decreased by 2.9%. The County has also experienced an average home sales price increase of 12.8% since 2014, which will affect the assessed value of homes in the area.

C. Transportation

Public transportation in Stark County benefits renters and the poor, particularly in the urban centers. Over half of renters in Canton and nearly a third of renters in Massillon use public transportation to get to their jobs. Public transit use is higher in the urban centers than the Urban County for all groups, which is likely a function of bus routes that are primarily focused around Canton and Massillon. A survey conducted by Stark Area Regional Transportation Authority (SARTA) found that 14% of riders are unemployed. The public transportation system's ridership generally consists of the County's most vulnerable population – the poor, elderly, and disabled.

Figure 6-3 Percent of People Using Public Transportation to get to Place of Work, 2016

	Stark County	Urban County	Alliance	Canton	Massillon
Renters	25.2%	5.8%	10.1%	50.9%	31.1%
Homeowners	1.8%	1.8%	0.4%	2.4%	0.6%
Below Poverty Line	7.5%	1.9%	4.2%	14.2%	7.7%
White	0.8%	0.4%	0.4%	2.9%	1.4%
Black	7.1%	2.3%	4.3%	9.4%	6.8%

Source: Census Bureau, American Community Survey 2012 - 2016, B08105A, B08105B, B08122, B08137

SARTA's bus routes primarily serve more dense areas in Canton and Massillon due to its cost effectiveness, however, it has also built some routes around major employers' needs. Routes are generally from 6am to 10pm with more late night routes. There is no Sunday bus service.

The Stark County Area Transportation Study (SCATS) conducts planning for the region's non-public transportation needs. SCATS conducts reviews of proposed transportation projects, scoring proposals based partially off how it will affect LMI areas. There is also an environmental justice review that looks at whether a project will cause negative side effects disproportionately to LMI areas. Stakeholders with both SARTA and SCATS expressed the need for more coordination between transit and development groups in order to more efficiently meet the County's development patterns.

In accordance with the American with Disabilities Act (ADA), all of SARTA's fixed route services are accessible to persons with wheelchairs and common scooters. Additionally, SARTA operates Proline, a curb-to-curb para-transit service for person with disabilities who are unable to access fixed-route services. To access Proline, a person must submit an application and renew it regularly. Service may be suspended or denied to persons who do not show up for their designated pick-up time or who cancel their pick-up less than one hour before scheduled. Proline services are available to all locations within Stark County.

In its 2040 Comprehensive and Transportation Plan, the Stark County Regional Planning Commission (SCRPC) identified future public transportation efforts that are under review. They include:

- Increase service on key routes from 60 minutes to 30 minutes in order to increase connectivity within the system.
- Expand services with Colleges and Universities to provide transportation for their students.
- Develop an Employment on Demand service that would be an express or direct route from a Transit Center to a specific employer.
- Explore a "Childcare Express" service, similar to the employment on demand. The draft idea is to take riders from a Transit Center to a specific child care center and back to the Transit Center.
- Create a Wheelchair repair program that would assist a rider with wheelchairs with repairs.
- Conduct a pilot for a Dial A Ride service in certain areas that will serve the general public that do not have access to our fixed routes.
- Explore Re-instituting Sunday service for riders who rely on public transit to get to work.
- Coordinate with Communities to improve pedestrian access between SARTA bus stops, stores, medical facilities and other destinations within Stark County.

D. Newspaper Advertising

Under federal law the making, printing, and publishing of advertisements that state a preference, limitation, or discrimination on the basis of race, color, religion, sex, handicap, familial status or national origin is prohibited. The prohibition applies to publishers, such as newspapers and directories. The prohibition also applies to persons and entities placing real estate advertisements.

Publishers and advertisers are responsible under federal law for making, printing, or publishing an advertisement that violates the Fair Housing Act on its face. Thus, they should not publish or cause to be published an advertisement that on its face expresses a preference, limitation or discrimination on the basis of race, color, religion, sex, handicap, familial status or national origin. The law, as found in the Fair Housing Amendments Act of 1988, describes the use of words, photographs, symbols or other approaches that are considered discriminatory.

For the AI, reviews were conducted of the online and print real estate listings of three Stark County publications: *The Repository* (all of Stark County, but predominantly Canton), *The Independent* (Massillon) and *The Review* (Alliance). All three are sister publications of GateHouse Media, Inc.

The Repository and *The Independent* have the same publisher and their rental listings cover the same geographical area. There are two sections of rental listings. One is a list of text only ads, and the other is more in depth with map locations and pictures of available properties. The text-only section contained a large fair housing notice that was easily visible at the beginning of each search page. It also had a policy statement that cited the newspaper's intended compliance with federal, state and municipal fair housing laws, and informed readers that the newspaper would not "knowingly accept any advertising for real estate which is in violation of the law." There was no contact information any of the local fair housing offices. None of the individual ads contained the fair housing logo or policy.

The section containing picture ads of rental properties had no fair housing logo with the list of available properties. Each ad has a link at the very bottom – after some extra scrolling down—containing a link titled "Equal Housing Opportunity" that directs the user to the fair housing equal opportunity page of the HUD website.

The text ad section had 75 rental properties that were analyzed. Of the 75, there were 12 containing text that states pets are not allowed without providing exceptions for service animals. This could prevent residents with disabilities requiring service animals from applying for these properties. There was also one advertisement that stated the property was safe and quiet. This could potentially prevent families with young children from applying. All of these instances could potentially restrict the choice of housing available to protected classes. The section containing picture advertisements had 10 residential properties for rent. There were no instances of potentially restrictive language used in these ads.. There was no available print version of *The Repository* and *The Independent* to determine if they are following fair housing laws.

The Review contained an online database of 12 residential properties for rent in a text only section of the website. This section contained no fair housing logo or information; neither did the individual advertisements. There were two ads containing text that states pets are not allowed without providing exceptions for service animals.

There was also the Friday, September 14th and Saturday, September 15th print editions available for review. The real estate section did contain a fair housing logo with a policy statement that cited the newspaper's intended compliance with federal, state and municipal fair housing laws, and informed readers that the newspaper would not "knowingly accept any advertising for real estate which is in violation of the law." This logo is only on the real estate sale section. The rental section is six pages afterward. In order to provide the full benefit, the fair housing logo and policy should be next to both purchase and rental section.

The print rental advertisement section contained 28 ads. Of these 14, three contained text that states pets are not allowed without providing exceptions for service animals, and 1 advertisement that stated the property was quiet. These could prevent households requiring service animals or that contains children from applying to these properties and restrict their housing choice.

7. General Fair Housing Observations

A. Demographics and Income

1. **The minority population of Stark County grew at a rate of 8.6% signaling a growing diversity.**
   Though minorities still only make up 11.6% of the total population, this comes during a period of decline in White residents.

2. **Segregation in Stark County fell slightly but increased in the Urban County dramatically.**
   The urban centers' segregation index scores fell by an average of 18.8 points. The Urban County's large increase could be due to the large increase in Blacks in the Urban County around the periphery of Canton.

3. **Household incomes in Stark County have failed to keep up with inflation resulting in county wide poverty rates rising.**
   Poverty disproportionately affected Black households. Over 50% of White households are in the upper two income quartiles compared to only 21.5% of Black households.

4. **Household income has risen primarily for White families.**
   Over 50% of White households are already in the upper two income quartiles compared to only 21.5% of Black households. This means that income inequality is widening along racial lines.

5. **In the region, 6.5% of the population suffers from some sort of disability, down from 11.2% in 2012 and 17.7% in 2000.**
   Stark County's disabled population is more likely to be in poverty – 36.9% of disabled persons are impoverished compared to 13.8% of persons without a disability.

6. **The urban centers contain much higher rates of female-headed family households.**
   For example, 20.8% of Canton's households are headed by females compared to only 9.2% in the Urban County. The poverty rate among female-headed households with children is significantly higher than both married-couple families and male-headed households with children across all of Stark County – 67.3% of the County's households with children in poverty are female-headed.

7. **Families where at least one of the parents have been born outside the United States experienced greater rates of poverty than the native born population in 2016.**
   52.2% of families with a foreign-born parent were living under 200% of the poverty level.

8. **Impacted areas are the confluence of areas that are greater than 51% LMI and have high concentrations of ethnic or racial minorities.**
   Investments in these areas are more likely to have the greatest impact on alleviating poverty in the short-term, however, care must be taken to also provide affordable housing opportunities in other areas of the County.
   - Alliance has 1 census tract that is an impacted area (7104).
   - Canton has 5 census tracts that are impacted areas (7001, 7015, 7018, 7021, 7023).
   - Massillon has 1 census tract that is an impacted area (7142).

9. **Blacks participated in the labor force at higher rates than Whites by 2 percentage points**
   However, they experience significantly higher unemployment rates – 12.6% unemployment for Blacks compared to 4% for Whites. Additionally, the median household income for Blacks is only 52.4% of the median household income for Whites in Stark County.

B. Housing Market

1. **The Urban County's share of housing stock increased.**
   This is likely due to population loss in the cities compared to the Urban County. The stock that remains in the urban centers also tends to be older and most likely in disrepair.

2. **Single-family housing units comprised 77.9% of all housing in the region.**
   It is also the fastest growing form of housing by a wide margin. Growing the County's multifamily housing stock will be essential in creating more quality affordable housing.

3. **The number of foreclosures in Stark County has stabilized since the financial crisis in 2008.**
   By 2015 there were only 1,081 foreclosures in Stark County – down 80% from 2008. Foreclosures are more likely to impact minority households due to their lower incomes and less stable employment opportunities, and so should still be monitored closely despite a sharp drop.

4. **The Black homeownership rate is 36.4%.**
   This is far below the homeownership rate for Whites, which stands at 71.9%. White households in the Urban County also own their homes at higher rates than the urban centers by over 10 percentage points each.

5. **Adjusting for inflation, the median housing value fell 11.3% since 2000.**
   Meanwhile, rents have increased by 1.7% countywide, while the real median income has fallen by 11.3%. These factors have led to a 9.4% reduction in the number of affordable housing units for Black households at 30% of the area median household income.

6. **On average, minority families have larger families and lower incomes than White families.**
   This makes it more difficult for minority families to find housing that suits their needs and does

not leave them cost burdened. There also tends to be fewer housing units that are large enough to suit these families in the rental market.

7. **Canton's eviction rate is the 33rd highest among midsized cities in the country and 2nd highest in Ohio for 2016.**
   Rising rents and falling wages will continue to cause more evictions in Stark County. These conditions disproportionately impact minority households and female-headed households with children, and can have financial implications that last a lifetime.

8. **The housing market has recovered in some aspects since the market crashed in 2008.**
   Affordability varies greatly across race, however. The typical Black family can only afford 77.8% of the typical house in Stark County, while the typical White family can afford 155.9% of the typical house.

8. Impediments and Recommendations

A. Urban County

a) Policy Recommendations

1. **The county does not yet have an official Language Access Plan.**
   A four-factor analysis was completed and an LAP draft exists, however, it has not yet been approved and implemented in its entirety. Until there is a written policy approved and implemented, Spanish-speaking persons in the County will not receive the same standard of service with each interaction with the County.

   Recommended Action Step: Finish drafting the Language Access Plan and begin implementing it as soon as possible.

2. **Expand housing choice for LMI households outside of impacted areas.**

   There are no explicit policies for the creation of affordable housing outside of impacted areas. Without explicit policies, it is difficult to enforce the County's affordable housing priorities. One of the major policy tools at the County's disposal is its HOME funds. The County's HOME Policies and Procedures manual indicates HOME projects are primarily used for neighborhood revitalization, however, according to the neighborhood site and selection standards in 24 CFR 983.57, the selected site must be consistent with the goal of deconcentrating poverty and expanding housing choice.

   Applicants for HOME assistance in new construction projects should abide by the County's goal of expanding housing opportunities outside of impacted areas. The County can ensure compliance with this goal through explicit policies in its Consolidated Plan and HOME manual.

   Recommended Action Step: Develop a policy that identifies LMI and racially concentrated areas in county planning documents as the first step in advocating for creating affordable housing opportunities in higher opportunity areas. At the very least, these areas should be identified in the Consolidated Plan in order to monitor if new affordable housing development is occurring in impact areas. These areas should also be addressed in the HOME Policies and Procedures manual as a policy goal for considering alternate development sites.

3. All County government personnel have not received fair housing training.

All employees of Stark County should receive some form of fair housing training. This will create large pool of public employees trained to identify residents' right to fair housing. By expanding fair housing knowledge to employees countywide, the County creates more instances where a resident comes into contact with someone that can identify when fair housing rights are being violated.

Recommended Action Step: Expand fair housing education and outreach to all employees of Stark County on an annual basis.

Recommended Action Step: The Fair Housing Office should continue its education and outreach initiatives.

4. The Consolidated Plan continues to require updates

The County amended the Consolidated Plan to include a definition for areas of minority concentration, however, the definition is not sufficient. The new definition compares households rather than all residents.

Recommended Action Step: Amend the comparison to be "residents" rather than households.

5. The increase of fair housing complaints indicates that discrimination still occurs in Stark County.

The majority of discrimination complaints reported at all levels involved were disability and race related complaints. The increase in complaints could be related to new fair housing activities that are raising awareness of residents' rights. These activities should continue and in order to keep residents aware of their rights, and to keep landlords aware of their responsibilities.

Recommended Action Step: The SCRPC, along with agencies administering similar programs in Canton and Massillon, should continue to invest in landlord outreach, education and testing in order to broaden understanding of responsibilities under the Fair Housing Act.

b) Urban County Fair Housing Action Plan

	2019	2020	2021	2022	2023	Responsible Entity
Create affordable housing opportunities outside impacted areas.						
Develop a policy that identifies LMI and racially concentrated areas and policies that will create housing opportunities in alternative sites. Include this plan in the Consolidated Plan and HOME Policies and Procedures manual.	•					SCRPC
In the Consolidated Plan, amend the comparison for racially concentrated areas to be "residents" rather than households.	•					SCRPC
Improve the County's ability to offer fair housing services.						
The SCRPC, along with agencies administering similar programs in Canton and Massillon, should continue to invest in landlord outreach, education and testing in order to broaden understanding of responsibilities under the Fair Housing Act.	•	•	•	•	•	SCRPC
Finish drafting the Language Access Plan and begin implementing it as soon as possible.	•					SCRPC
Expand fair housing education and outreach to all employees of Stark County on an annual basis.	•	•	•	•	•	SCRPC, Stark County
The Fair Housing Office should continue its education and outreach initiatives.	•	•	•	•	•	SCRPC

B. City of Alliance

a) Policy Recommendations

1. **The City's regulation of group homes places restrictions that are not consistent with fair housing standards.**

   The current ordinance places a burden on group homes by allowing them in one of its residential zones only through conditional use, which is inconsistent with the Fair Housing Act.

   Recommended Action Step: Amend the ordinance to allow group homes in the same residential districts as single-family dwelling units for non-disabled persons and permit them by right without any conditions.

2. **The City's definition of family is narrow and could discriminate against a variety of nontraditional family types.**

   The numerical limits in the City's definition of family are discriminatory towards individuals that are living together due to financial reasons or other practical reasons. In order to be non-discriminatory, the definition should place emphasis on a group of individuals functioning as a single housekeeping unit.

Recommended Action Step: Amend the definition of family so that it does not have a numerical limit and instead emphasizes the functioning of the individuals as a single housekeeping unit.

3. **The City's appointed public boards relating to housing issues are not demographically representative of the community at large.**

   Based on responses to a survey to members of appointed boards and commissions relating to housing issues, the City's public boards do not represent the gender and racial composition of the City. Response rates were too low to conclusively determine how to best reach representative boards, but they should strive to more equally represent the city they work for.

   Recommended Action Step: Consider the composition of race, gender, and disability when appointing new members to the City's boards and commissions that could influence housing issues.

4. **The Comprehensive Land Use Plan and the City's zoning ordinance discourage the development of multi-family rental housing.**

   The City's land use plan was developed in 2004. Many of the factors that were important to the development of that plan have changed. Without a current land use plan the City will not be as efficient or coordinated in its development efforts, which could hurt efforts at creating housing opportunities across the entire City. The City should look to create a new land use plan that takes into account its current demographic and economic trends. If Alliance does not have the means of producing its own Future Land Use Plan, it may be worthwhile to produce one in conjunction with Stark County.

   Recommended Action Step: Update the City's land use plan to include a statement to encompass its fair housing aims and ensure that the intent and effect of the housing policies established are consistent with that statement.

5. **The City has no Language Access Plan.**

   The City does not currently meet the HUD safe harbor threshold for persons with LEP, however, stakeholders stated that the area has a growing Spanish-speaking population that are in need of government services. A four-factor analysis followed by a Language Access Plan will allow the City to meet this population's needs by providing translation and interpretation services as necessary.

   Recommended Action Step: Conduct a four factor analysis and create a Language Access Plan.

6. **Some landlords are not making investments to improve and maintain their properties, leaving low-income tenants living in unhealthy environments.**

   Stakeholders in the City reported that much of the older housing stock is being purchased by investors and converted to rental properties. These units are not receiving adequate reinvestment to maintain them as a healthy, safe space for tenants to live, which could lead to public health issues for the City. Since a large proportion of low-income renters are minorities, restricts fair housing choice for protected classes.

   The lack of reinvestment in these properties is also causing the City's investment in LMI neighborhoods to be under threat. Alliance invests CDBG and HOME funds into these neighborhoods. The City has also taken advantage of NIP funds from the County's land bank in order to demolish vacant and blighted properties creating green space in LMI neighborhoods. A lack of reinvestment by landlords is causing additional blight in the area and negating some of the desired effects of the City's efforts.

   A landlord registry would help reduce the worst effects of this lack of reinvestment by holding landlords accountable. Most landlord assess a fee for each rental unit ($10 - $25, for example), which can pay for the required inspections when tenants move out. These fees help pay for inspections that check for health hazards inside the units before they are rented to a new tenant. This registry should also be used to track fair housing complaints against landlords. This information should be shared with SCRPC in order to catch repeat violators across the County. Offenders should be required to attend mandatory fair housing training in order to learn about fair housing law and retain the right to rent.

   Recommended Action Step: Create a landlord registry that includes unit inspections and fair housing training.

   Recommended Action Step: Create a database of complaints against landlords. Share database with SCRPC in order to fight noncompliance with fair housing across the County.

7. **The City has areas consisting of concentrated LMI persons and racial and ethnic minorities.**

   These impacted areas have suffered from disinvestment and concentrated poverty. They are in need of housing rehabilitation and revitalization in order to improve the quality of life available to residents living in these areas.

   Recommended Action Step: Allocate CDBG funding to enhance and revitalize LMI areas and improve the existing housing stock.

b) Alliance Fair Housing Action Plan

	2019	2020	2021	2022	2023	Responsible Entity
Update housing related documents, boards, and commissions in order to more affirmatively further fair housing.						
Update the City's land use plan to include a statement to encompass its fair housing aims and ensure that the intent and effect of the housing policies established are consistent with that statement.	•	•	•	•	•	Alliance, Massillon, SCRPC
Consider the composition of race, gender, and disability when appointing new members to the City's boards and commissions that could influence housing issues.	•	•	•	•	•	Alliance
Conduct a four factor analysis and create a Language Access Plan.		•				Alliance
Update and amend city codes and ordinances.						
Amend the ordinance to allow group homes in the same residential districts as single-family dwelling units for non-disabled persons and permit them by right without any conditions.	•					Alliance
Amend the definition of family so that it does not have a numerical limit and instead emphasizes the functioning of the individuals as a single housingkeeping unit.	•					Alliance
Ensure landlord compliance with fair housing laws.						
Create a landlord registry that includes unit inspections and fair housing training.		•				Alliance
Create a database of complaints against landlords. Share database with SCRPC in order to fight noncompliance with fair housing across the County.		•				Alliance, SCRPC
Alliance should continue to provide fair housing education and outreach.	•	•	•	•	•	
Invest in impacted areas.						
Allocate CDBG funding to enhance and revitalize LMI areas and improve the existing housing stock.	•	•	•	•	•	Alliance

C. City of Canton

a) Policy Recommendations

1. **The Southeast area of the City, which consists nearly exclusively of areas of Black concentration, is becoming increasingly isolated from amenities and services.**

   This section of the City generally lacks industry, retail and jobs, in addition to basic neighborhood features such as gas stations and grocery stores. Stakeholders have stated that this isolation is preventing residents from accessing services available to them. Such isolation can cause public health issues as it becomes more difficult to access nutritional food and health services. This was an impediment in the previous AI. It remains an impediment that will require more effort on the parts of Canton and Stark County stakeholders.

   Recommended Action Step: The City should continue to invest CDBG funds and other available resources in the revitalization of these areas, with a goal of targeting economic development in the most viable neighborhoods. The ultimate aim of these efforts would be the encouragement of private development in housing and job creation. Attracting a racial balance will require these neighborhoods to provide educational, recreational, employment and affordable housing opportunities.

   Recommended Action Step: To mitigate segregation the City should increase efforts to provide families with children and Black residents of Southeast Canton with access to housing opportunities in non-impacted areas within and beyond the City. This could involve the creation of new housing opportunities in non-impacted neighborhoods of Canton via HOME or other resource investment; working with SMHA and HCV landlords to increase the mobility of voucher holder households; improved outreach and education to encourage home ownership across the City; advancing policy initiatives (such as the removal of zoning barriers or the addition of incentives) to promote the development of affordable housing in non-concentrated areas; and other methods aimed to promote integration among Canton neighborhoods.

   Recommended Action Step: The City should continue to work with the Stark Area Regional Transportation Authority (SARTA) to evaluate the adequacy of public transit service for residents of Canton's Southeast area and advise SARTA on improvements that would more fully connect residents to opportunities in other neighborhoods. There should also be more efforts at coordinating the development of affordable housing with public transportation routes.

   Recommended Action Step: Create a written policy and use GIS mapping to identify the areas of the City most in need of investment of entitlement funds. Maps should also be used to track the creation of housing opportunities outside of these areas.

2. **The Consolidated Plan reports that the vast majority of the residential territory of the City is zoned R1, which restricts the construction of multifamily housing around the city.**

   Much of the City's residential zoning is limited to single family homes with a minimum lot size of 8,000 square feet. This type of zoning limits multi-family housing construction making it harder to build affordable housing. These larger lots also reduce the City's density, and increase the cost of both private and public transportation in the area.

   Recommended Action Step: The City should amend its zoning ordinance to allow a greater variety of residential construction, including multi-family units.

3. **The City's appointed boards and commissions that work with housing related issues tend to be unrepresentative of the City at large and the population most in need of fair housing opportunities.**

   The Canton City Planning Commission needs two more female members for a total of six, and the Zoning Board of Appeals needs one additional Black member and one additional female member to be more representative of the entire City. More representative boards will be able to make housing decisions based on a more representative set of viewpoints and experiences.

   Recommended Action Step: Add more diversity to and create more representative appointed boards and commissions that are working on housing related activities.

4. **The City's definition of family could be discriminatory to some types of non-traditional families.**

   The numerical limits in the City's definition of family are discriminatory towards individuals that are living together due to financial reasons or other practical reasons. In order to be non-discriminatory, the definition should place emphasis on the individuals functioning as a single housekeeping unit.

   Recommended Action Step: Amend the definition of family so that it does not have a numerical limit and instead emphasizes the functioning of the individuals as a housekeeping unit.

5. **Canton does not have a database of fair housing complaint records.**
   A fair housing complaint database allows a city to track which neighborhoods receive the most complaints, what type of complaints, and whether or not certain landlords or companies are repeat offenders. Using this type of information, Canton can gain a better understanding of how to more efficiently reach out to and educate landlords about their duties under fair housing law. This information can also be shared with the County in order to take a more coordinated effort at tackling regional housing discrimination.

   Recommended Action Step: Create a fair housing complaint database with the intention of working closely with SCRPC and other cities in stopping housing discrimination throughout the County.

b) Canton Fair Housing Action Plan

	2019	2020	2021	2022	2023	Responsible Entity
Invest in the Southeastern LMI areas of the City.						
The City should continue to invest CDBG funds and other available resources in the revitalization of these areas, with a goal of targeting economic development in the most viable neighborhoods.	•	•	•	•	•	Canton
Increase efforts to provide families with children and Black residents of Southeast Canton with access to housing opportunities in non-impacted areas within and beyond the City in order to mitigate segregation.	•	•	•	•	•	Canton
Create a written policy and use GIS mapping to identify the areas of the City most in need of investment of entitlement funds. Maps should also be used to track the creation of housing opportunities outside of these areas.	•					Canton
Amend and update city codes and ordinances						
The City's Zoning board should look at what areas of the City can be rezoned to allow a greater variety of residential construction.The City should amend its zoning ordinance to allow a greater variety of residential construction, including multi-family units.	•	•	•	•	•	Canton
Amend the definition of family so that it does not have a numerical limit and instead emphasizes the functioning of the individuals as a single housekeeping unit.	•					Canton
Amend the City's ordinances to allow group homes in same residential districts as single-family dwelling units for non-disabled families.	•					Canton

Strive to more affirmatively further fair housing						
Add more diversity to and create more representative appointed boards and commissions that are working on housing related activities.	•	•	•	•	•	Canton
Create a fair housing complaint database with the intention of working closely with SCRPC and other cities in stopping housing discrimination throughout the County.		•				Canton, SCRPC
The City should continue to work with the Stark Area Regional Transportation Authority (SARTA) to evaluate the adequacy of public transit service for residents of Canton's Southeast area and advise SARTA on improvements that would more fully connect residents to opportunities in other neighborhoods. There should also be more efforts at coordinating the development of affordable housing with public transportation routes.	•	•	•	•	•	Canton, SARTA

D. City of Massillon

a) Policy Recommendations

1. **Due to the age and limited scope of the Future Land Use Plan, the City lacks a comprehensive housing policy document.**

   Massillon does not currently use comprehensive planning as a means of developing and implementing housing policy, using the five-year consolidated planning process instead to identify and serve housing needs. The consolidated planning process, by its definition in regulation, focuses on the housing needs of lower-income and special needs populations. A larger framework to define how the City envisions its layout and ideal housing supply and how it will prioritize and implement housing and land use policies would provide a more thoughtful planning context and an opportunity to ensure that all of the City's policies related to housing – not only its entitlement programs – are consistent with fair housing aims.

   It is worth noting that the latest plan on record, developed in 1969, is not inconsistent with fair housing goals. The Future Land Use Plan supplies a brief and somewhat vague treatment of housing policy that proposes the expansion of multi-family housing opportunities and the use of denser multi-family residential areas to connect single-family neighborhoods with non-residential uses. These policies are still appropriate for Massillon's development mix and demographic composition.

Recommended Action Step: Evaluate the feasibility of undertaking a comprehensive plan for the City of Massillon or in conjunction with the Stark County HOME Consortium. Should resources allow for the development of a new plan, the City should include a statement to encompass its fair housing aims and ensure that the intent and effect of the housing policies established are consistent with that statement.

2. **The City's regulations of group homes are not consistent with fair housing law.**

   The City's definition only considers a living situation a group home if there is a minimum of persons in the home. Additionally, they are only conditionally allowed in two of its residential districts. In order to be consistent with the Fair Housing Act, group homes must be allowed anywhere single family homes are allowed and cannot be subjected to additional restrictions.

   Recommended Action Step: Amend the City's zoning code to permit group homes in the same zones as single family homes. Eliminate the 9 person minimum from the definition for group home.

3. **There is inadequate representation for minorities, women, and persons with disabilities on the City's appointed boards and commissions.**

   Stakeholders in Massillon expressed that, while 15.4% of the City's population has disabilities, it does not have enough representation on the City's boards and commissions. This leaves many of their problems unaddressed. Adding members with disabilities, especially to housing related boards, would provide the representation needed to give this population a voice in the decision making process. Several of the City's boards and commissions also lack the representation of the City's minorities and women.

   Recommended Action Step: Improve the ability of the City's boards and commissions to be more representative of the City's population by seeking qualified candidates who are women, minorities, and/or have a disability.

4. **Some landlords are not making improvements to their rental properties, which leaves low-income tenants living in unhealthy environments.**

   Stakeholders in the City reported that much of the older housing stock is being purchased by investors and converted to rental properties. These units are not receiving adequate reinvestment to keep them a healthy, safe space for tenants to live, which could lead to public health issues for the City. Since a large proportion of low-income renters are minorities and families with children, this restricts housing choice for protected classes.

   The lack of reinvestment in these properties is also causing the City's investment in LMI neighborhoods to be under threat. Massillon invests CDBG and HOME funds into these neighborhoods. The City has also taken advantage of NIP funds from the County's land bank in order to demolish vacant and blighted properties creating green space in LMI neighborhoods. A lack of reinvestment by landlords is causing additional blight in the area and negating some of the desired effects of the City's efforts.

The City has a landlord registry, which stakeholders estimate has a 50% participation rate, which requires a $125 one-time fee for each property that is on the rental market. Compliance with city codes is complaint driven. Once a complaint is received, a member of Code Enforcement inspects the residence to determine the validity of the complaint. If the complaint is valid, a notice is given to the landlord that repairs need to be made. If the rental becomes vacant, and these repairs are not completed, the Landlord cannot rent the apartment or house until Code Enforcement Officers have confirmed the repairs are have been completed.

The problem with a complaint driven system is that tenants may feel they cannot complain for fear of being discriminated against by their landlord in the future, particularly if a tenant feels they have no other housing options. The City's current registry could be improved upon in ways that will increase compliance and improve living conditions for residents. An inspection should be required when landlords initially register a unit, which will ensure new rental units are safe for residents before going on the market. Inspections should also be required after a tenant leaves and before a new tenant moves in. This requirement will lead to landlords making necessary repairs to keep their units in compliance before residents need to complain.

As a way to increase the participation rate on the registry, these requirements should be coupled with an aggressive marketing campaign that makes tenants aware of their landlords have a responsibility to them and the City, and part of that responsibility is joining the registry. This registry should also be used to track fair housing complaints against landlords, and the information should be shared with SCRPC in order to catch repeat offenders across the County. Offenders should be required to attend mandatory fair housing training in order to learn about fair housing law and retain the right to rent.

Recommended Action Step: Change the landlord registry requirements to include mandatory inspections upon first registering and during tenant turnover.

Recommended Action Step: Create a database of complaints against landlords. Share database with SCRPC in order to fight noncompliance with fair housing across the County.

b) Massillon Fair Housing Action Plan

	2019	2020	2021	2022	2023	Responsible Entity
Strive to more affirmatively further fair housing.						
Evaluate the feasibility of undertaking a comprehensive plan for the City of Massillon or in conjunction with the Stark County HOME Consortium. Should resources allow for the development of a new plan, the City should include a statement to encompass its fair housing aims and ensure that the intent and effect of the housing policies established are consistent with that statement.	•	•	•	•	•	Massillon, Alliance, SCRPC
Amend the Consolidated Plan to include a specific definition of areas of minority concentration, carrying the definition through future Annual Action Plans. Continue to invest CDBG funds in ways that enhance and revitalize LMI areas and preserve and improve the existing housing stock. Work closely with the Stark County Regional Planning Commission to identify new HOME affordable rental housing project sites outside of impacted areas.	•	•	•	•	•	Massillon
Improve the ability of the City's boards and commissions to be more representative of the City's population by seeking qualified candidates who are women, minorities, and/or have a disability.	•	•	•	•	•	Massillon
Update and amend city codes and ordinances.						
Amend the City's zoning code to permit group homes in the same zones as single family homes. Eliminate the 9 person minimum from the definition for group home.	•					Massillon
Ensure landlord compliance with fair housing laws.						
Change the City's landlord registry requirements to include mandatory inspections upon first registering and during tenant turnover.		•				Massillon
Create a database of complaints against landlords. Share database with SCRPC in order to fight noncompliance with fair housing across the County.		•				Massillon, Alliance, SCRPC

E. Regional Impediments and Recommendations

a) Policy Recommendations

1. **Coordination between SARTA and local development departments could be improved from a fair housing standpoint.**

   Residents living in impacted areas are some of the County's most vulnerable. In many instances they live in food deserts and are isolated from many other essential services like hospitals and childcare. They are also far from employment opportunities, and lack the income or credit to buy a personal vehicle. These residents rely on public transportation to access all of these services and opportunities.

   A lack of coordination between SARTA and local planning departments leads to public transportation infrastructure that is reactive rather than proactive, which makes it more difficult for transit-dependent residents to access jobs and services around the County. These residents face restricted housing choice based upon where they can access public transportation that will take them from their homes to employment services, commercial districts, and other local services.

   Coordination will allow SARTA to provide feedback on development decisions around the County, while allowing public transportation to forecast future needs and plan accordingly. Taking a more proactive approach to development will improve SARTA's ability to move those who rely on public transportation from their homes to essential opportunities and services around the County. From a fair housing standpoint, improved coordination will provide more housing choice for those residents who rely on public transportation.

   Recommended Action Step: Add a review by SARTA to SCRPC's review process for new development projects.

   Recommended Action Step: Incorporate public transportation staff in the development planning process through periodic group meetings with County and local planning staff and SARTA officials.

   Recommended Action Step: Add language to future comprehensive plans that describes how current and future public transportation projects will affect impacted areas.

b) Regional Fair Housing Action Plan

	2019	2020	2021	2022	2023	Responsible Entity
Coordinate with other entities.						
Add a public transportation aspect to SCRPC's review process for new development projects.					●	SCRPC
Incorporate public transportation officials in the development planning process through periodic group meetings with County and city level development stakeholders and SARTA officials.	●	●	●	●	●	SCRPC, SARTA, Development Stakeholders
Update and amend documents and processes.						
Add language to future comprehensive plans that describes how current and future public transportation projects will affect impacted areas.					●	SCRPC
SMHA should continue to meet the terms of the extended VCA.	●	●	●	●	●	SMHA

9. Signature Pages for Members of the HOME Consortium and the City of Canton

A. Signature Page for the Urban County

By my signature I certify that the Analysis of Impediments to Fair Housing Choice for the Urban County of Stark County is in compliance with the intent and directives of the regulations of the Community Development Block Grant Program and HOME Investment Partnerships Program.

____

(Signature of Authorizing Official)

____

Date

B. Signature Page for the City of Alliance

By my signature I certify that the Analysis of Impediments to Fair Housing Choice for the Urban County of Stark County is in compliance with the intent and directives of the regulations of the Community Development Block Grant Program and HOME Investment Partnerships Program.

____
(Signature of Authorizing Official)

____
Date

C. Signature Page for the City of Canton

By my signature I certify that the Analysis of Impediments to Fair Housing Choice for the Urban County of Stark County is in compliance with the intent and directives of the regulations of the Community Development Block Grant Program and HOME Investment Partnerships Program.

____

(Signature of Authorizing Official)

____

Date

D. Signature Page for the City of Massillon

By my signature I certify that the Analysis of Impediments to Fair Housing Choice for the Urban County of Stark County is in compliance with the intent and directives of the regulations of the Community Development Block Grant Program and HOME Investment Partnerships Program.

____
(Signature of Authorizing Official)

____
Date