

ANALYSIS OF THE
IMPEDIMENTS TO FAIR
HOUSING CHOICE (AI)
2024 Draft

THE CITY OF SANDUSKY, OHIO



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1.0 INTRODUCTION

Equal access to housing is fundamental to each person in meeting essential needs and pursuing personal, educational, employment, or other goals. In recognition of equal housing access as a fundamental right, the federal government, the State of Ohio and the City of Sandusky have established fair housing choice, the right to live where one wants and can afford, as a right protected by law.

For more than fifty years, U.S. Department of Housing and Urban Development (HUD) funding recipients have been obligated by law to reduce barriers to fair housing. Established in the Fair Housing Act of 1968, the law directs HUD and its program participants to affirmatively further the Act's goals of promoting fair housing and equal opportunity. All cities and counties that receive Community Development Block Grant (CDBG) funds from the HUD are obligated to identify, analyze, and devise solutions to impediments to fair housing choice that may exist in the community. They are required to certify that they will affirmatively further fair housing as a condition of receiving these federal funds. The tool used to establish that they are affirmatively furthering fair housing is the *Analysis of Impediments to Fair Housing Choice* (AI).

This AI report, for the City of Sandusky, presents a demographic profile of the City, assesses the extent of housing needs among specific race, ethnic groups, income groups, and evaluates the availability of a range of housing choices for residents. This report also analyzes the conditions in the private market and public sector that may limit the range of housing choices or impede a person's access to housing. As the name of the report suggests the document reviews "impediments" to fair housing. While this report also assesses the nature and extent of housing discrimination, the focus is on identifying impediments that may prevent equal housing access and developing solutions to mitigate or remove such impediments.

Analyses of Impediments Overview

While the extent of the obligation to affirmatively advance fair housing is not defined statutorily, HUD defines it as requiring a recipient of funds to:

- △ Conduct an analysis to identify impediments to fair housing choice within the jurisdiction
- △ Take appropriate actions to overcome the effects of any impediments identified through the analysis, and;
- △ Maintain records reflecting the analysis and actions in this regard.



An AI is an examination of the impediments or barriers to housing that effect protected classes within a geographic region. HUD defines impediments to fair housing choice in terms of their applicability to state and federal law. This includes:

- △ Any actions, omissions or decisions taken on the basis of race, color, religion, sex, disability, familial status, national origin, and/or military status (State of Ohio) which restrict housing choices or the availability of housing choice.

- △ Any actions, omissions or decisions which have the effect of restricting housing choices or the availability of housing choice on the basis of the protected classes listed previously.

The Analysis of Impediments process involves a thorough examination of a variety of sources related to housing, affirmatively furthering fair housing, the fair housing delivery system and housing transactions, which affect people who are protected under fair housing law. AI sources include census data; home mortgage industry data; federal, state and local housing complaint data; surveys of housing industry experts and stakeholders; and other housing information.

2.0 COMMUNITY PROFILE FOR CITY OF SANDUSKY

2.1 History

Sandusky is a city in and the county seat of Erie County. It lies along the southern shore of Lake Erie, located roughly midway between Toledo (45 miles [72 km]) west and Cleveland (50 miles [80 km]) east. According to the 2020 census, the City had a population of 25,095, and the Sandusky metropolitan area had 115,986 residents.

Sandusky is home to the Cedar Fair Entertainment Company, which owns large amounts of property in Sandusky. These properties include Cedar Point, Cedar Fair's flagship park and one of the most popular amusement parks in the world, as well as Cedar Point Shores waterpark, adjacent to Cedar Point itself. In 2011, Sandusky was ranked No. 1 by Forbes as the "Best Place to Live Cheaply" in the United States due to its high median family income of \$64,000 compared to its relatively low cost of living. The National Arbor Day Foundation has designated Sandusky as a Tree City USA.

In past years Sandusky was the center of Ohio's wine industry, lumber transportation, stone quarrying and by the 20th Century manufacturing and tourism. Prior to the abolition of slavery in the United States, Sandusky was a stop for refugee slaves on the Underground Railroad, as some would travel across Lake Erie to reach freedom in Canada. Many



refugee slaves seeking to get to Canada made their way to Sandusky, where they boarded boats crossing Lake Erie to the port of Amherstburg in Ontario.

Map 1 shows the City of Sandusky and Map 2 individual census tracts for Sandusky. While Erie County isn't part of this report, it is shown in some tables and briefly discussed in some sections due to the relationship between the two.

2.2 Location and Size of Sandusky - 2000,2010, 2021

Table 2.1 shows the population for Sandusky, the County and the State of Ohio. As of 2021 Sandusky was home to 25,095 people. In 2000, the population was 27,844 persons by the 2010 Census had fallen to 25,793, a 7.3% decrease in population between 2000 and 2010. By 2020 the population had decrease slightly by 2.7% from 2010.

By comparisons Erie County, minus Sandusky, showed small decreases in population between 2000 and 2010 of 0.8% and 1.47% between 2010 and 2020.

Table 2.1 - Population of the Sandusky and Percent Change, 2000-2010-2020

<i>Population</i>	<i>2000</i>	<i>2010</i>	<i>% Change 2000 - 2010</i>	<i>2021</i>	<i>% Change 2010 - 2021</i>
Sandusky	27,844	25,793	-7.3%	25,095	-2.7%
Erie County*	51,707	51,286	-0.8%	50,527	-1.5%
State of Ohio	11,252,140	11,536,504	1.6%	11,799,778	2.3%

* Minus Sandusky

2.2 Persons in Protected Classes

Protected classes as defined by the Fair Housing Amendments Act of 1988 include, Race, National Origin and Creeds, Religious Beliefs, Disabilities, and Familial Status (presence of children under the age of 18), and Gender. The State of Ohio includes Military Status in the protections as well.



2.2.1 Race

In Table 2.2, of the people living in Sandusky in 2020, 62% were Whites, 22.8% were African American, and 5.8% Hispanic/Latino. Other racial/ethnic groups made up less than 1% of the population, Asian population was the largest of this group at .04%.

Between 2010 and 2020 the White population showed a -14.2% decrease, as did those who designated themselves as One Race, -11.3%. African American/Black population had a small increase of .8%. Hispanic/Latino population showed the largest change of any racial group with an increase of 14.8%. Those who consider themselves with two or more racial heritage had an increased 43.1%. This increase could possibly be explained by the wider variety of choices offered to participants in the 2020 Census when determining the racial/ethnic characteristics of the population.

Table 2.2 - Population Distribution by Race 2010, 2020 Sandusky*

RACE	2010		2020		Total Change 2010 - 2020	
	#	%	#	%	#	%
Population One Race	24,375	94.5%	21,613	86.1%	2,762	-11.3%
White	18,158	70.4%	15,571	62.0%	2,587	-14.2%
African American	5,686	22.0%	5,732	22.8%	46	0.8%
Hispanic/Latino	1,265	4.9%	1,453	5.8%	188	14.8%
Asian*	156	0.6%	103	0.4%	49	-31.4%
Native Hawaiian/Pacific Islander*	-	-	4	0.04%	-	-
Native American/Alaskan Native Alone	104	0.4%	54	0.2%	50	-48.1%
Some Other Race	271	1.1%	149	0.5%	122	-45.0%
Two or More Races	1,418	5.5%	2,029	8.1%	611	43.1%
Total Population	25,793	N/A	25,095	N/A	N/A	N/A

* The Census category of Asian, Native Hawaiian/Pacific Islander, Native American/Alaskan Eskimo was changed between the 2010 & 2020 Census. In 2010 Asian was included in Native Hawaiian/Pacific Islander. In 2020 Asian was give its own category.

Table 2.3 shows population by census tract for 2010 and 2020. Table 2.4 shows the three major races that we are considering for this report based on their percent of population, White, Black, and Hispanic/Latino, for the year 2010 and 2020.



In Table 2.3 of the eight census tracts five showed decreases in populations between 2010 and 2020 - 407, 408.01, 408.02, 409, 413. Tracts 408.01 and 408.02 showed thre greatest decreases at -12.9% and -12.7%. These two tracts cover most of the downtown and it's surrounding area. Two tracts showed increases, 410 with the largest at 7.8% and 411 (3.5%). Tract 412 showed no chage between the two censuses.

Table 2.3 - Population by Tract 2010 & 2020

Census Tract	Population 2010	Population 2020	Percent
407	3,805	3,732	-1.9%
408.01	2,585	2,251	-12.9%
408.02	1,624	1,417	-12.7%
409	3,300	3,208	-2.8%
410	2,850	3,091	7.8%
411	4,052	4,199	3.5%
412	2,472	2,472	0.0%
413	3,585	3,501	-2.3%

In Table 2.4 the relationship of Race for the different census tract is shown for 2010 and 2020. Black population had increases in three tract between the two censuses, tracts 407, 409 and 410. In tract 407 and 409 the increases were small between two and four percent.

Tract 407 is nearest to downtown Sandusky and borders Lake Erie, it is the second largest tract in terms of population in the City. Between Blacks made up 25.7% of the population, by 2020 they made up 27.9% of the population in tract 407.

Tract 409 covers the western part of the City and also borders Lake Erie. In 2010 tract 409, blacks made up 13.5% of the tract population, by 2020 it had increased to 17.3%.

Tract 410 in the southern boarder of the City saw the greatest increase of any of the minority populations. Black population went from 14.4% of the tract population in 2010 to 40.1% in 2020. Tract 410 has the highest Black population of the eight tracts that make up the City and is the fastest growing of the tracts.

Hispanic/Latino population showed an increase in every tract but one between 2010 and 2020. Tract 408.01 reported no Hispanic/Latinos in 2020; in 2010 there were 157 persons 6.1% of the tract population. To go from 6.1% to zero percent in the ten years between census's is a concern, especially considering that there is reporting on those who claim two or more races of 328.



One explanation is that the number Hispanic/Latinos in tract 408.01 falls at or below the threshold for reporting. The threshold is based on not reporting low numbers for confidentiality.

Tract 412, which is in the central area of the City, Hispanics/Latinos had the largest population at 12% (696). This is more than double the population in 2010, a 77.8% increase by 2020. Tract 411 had the second highest percent of population at 11.1% (466) and tract 408.02 had the third highest at 8.8% (124).

The White population had losses in three tracts from 2010 to 2020, tracts 406, 408.01, and 409. All tracts were over 50% White population, tract 408.02 had the highest White population at 83.7%, tract 409 was second with 76.13% and third with 71.1% was tract 411.

Table 2.4 - Composition of Census Tracts by Race- City of Sandusky, 2010 & 2020

Tract	2010						2020					
	White		Black		Hispanic		White		Black		Hispanic	
	#	%* of Total	#	%* of Total	#	%* of Total	#	%* of Total	#	%* of Total	#	%* of Total
407	2,368	62.2%	977	25.7%	221	5.8%	2,248	61.2%	1,043	27.9%	281	7.5%
408.01	1,610	62.3%	586	22.7%	157	6.1%	1,393	62.0%	530	23.5%	0	0.0%
408.02	1,069	65.8%	341	21.0%	115	7.2%	1,187	83.7%	160	11.3%	124	8.8%
409	2,505	75.9%	446	13.5%	149	4.5%	2,449	76.3%	556	17.3%	181	5.6%
410	1,552	54.5%	930	14.4%	157	5.5%	1,614	52.2%	1,240	40.1%	203	6.5%
411	2,392	59.0%	983	24.3%	304	7.5%	2,987	71.1%	620	14.7%	486	11.6%
412	1,362	55.1%	775	31.3%	154	6.2%	1,838	64.4%	696	24.3%	345	12.0%
413	2,330	65.0%	865	24.1%	189	5.3%	2,217	63.3%	410	11.7%	293	8.3%

* Percent of total Census Tract population.



2.2.2 Gender

Figure 1 shows the relationship between males and females as a percent of population in the Sandusky. Male population was slightly larger than female population.

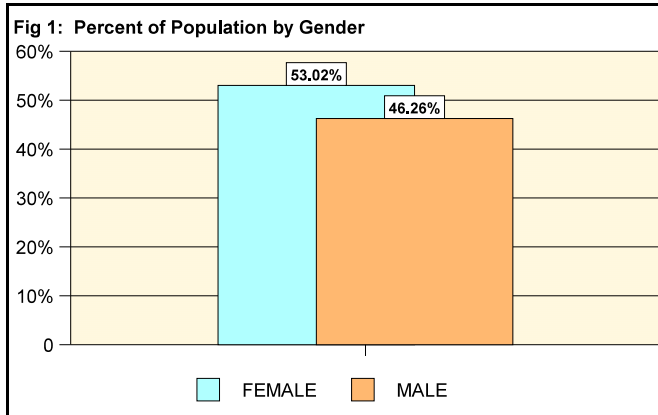


Table 2.5 compares married and unmarried households and the presence of children under 18 years of age for Sandusky. This is important in determining where poverty issues may exist. Typically female headed households with children (14.7%) are the greatest segment of those in poverty. Also, single male headed households with children (17.8%) have instances of poverty as well. Married households without children were by far the largest, 29% of households.

Table 2.5 - Marital Status With Presence of Children - City of Sandusky - 2020

Total Households	Married No Children	Married With Children <18	Nonfamily	Single Female No Children	Single Female With Children <18	Single Male No Children	Single Male With Children <18
11,167	3,233	2,858	4,786	2,427	1,638	721	346
Percent	29.0%	25.5%	42.8%	21.7%	14.7%	6.5%	3.1%

2.2.3 Special Needs Population

Disabled people in Sandusky in 2020 were 17.6% of the population. Table 2.6 shows the population of Sandusky by percent that are disabled based on age. As would be expected those aged 65 and over had the highest percent of disabilities with more than 38.5% and those under the age of five had the lowest 2.5%. The age group that is generally considered “the working age” had a disability rate of 17.6% and the same group had the highest share of the population of 61.5%.



Table 2.6 - Disability Status By Age Group - City of Sandusky - 2020

Age	#	%
Population	25,095	100.0%
With Disability	4,418	17.6%
Age <5 Pop	1,795	2.6%
With Disability	46	2.5%
Age <18 Pop	5,764	23.6%*
With Disability	286	5.0%
Age 18-64 Pop	15,427	61.5%*
With Disability	2,720	17.6%
Age 65+ Pop	3,663	14.6%*
With Disability	1,412	38.5%

* % of total population

Table 2.7 shows the nature of the disability for the City. Ambulatory difficulties was the most common disability with 9.3%. Followed by Cognitive Difficulties at 7.7% of the disabled population. Also it should be noted that difficulty with Independent Living, 6.5% of the disabled population fell into this category.

Table 2.7 - Nature of Disability - City of Sandusky - 2020

Disability	#	%
Total*:	24,854*	100.0%
With a disability:	4,351	17.5%
With a hearing difficulty	631	2.5%
With a vision difficulty	987	4.0%
With a cognitive difficulty	1,923	7.7%
With an ambulatory difficulty	2,302	9.3%
With a self-care difficulty	526	2.1%
With an independent living difficulty	1,606	6.5%
No disability	19,900	80.1%

* Total of Non-Institutional Population



According to Table 2.8 female population had over 19% of their population disabled compared to males at 15.8%. Racially Whites had the largest percent of the population with 18.6% disabled. Blacks had a similar share of their population with disabilities at 16.4%, while Hispanics/Latino had less than 1% of their populations disabled.

With the City having limited funds to address disabled issues. Tables 2.6, 2.7 and 2.8 can provide assistance in determining where to place those resources. Working with local organizations and advocates the discussion can be assisted by the data provided in these tables. Even though this data is from the 2020 Census it is still relevant to today's issues.

Table 2.7 Disability By Gender and Race - City of Sandusky - 2020

	Total	With a disability	Percent with a disability
Total	24,854	4,351	17.5%
SEX			
Male	11,688	1,844	15.8%
Female	13,166	2,574	19.6%
RACE AND HISPANIC OR LATINO ORIGIN			
White	16,537	3,077	18.6%
Black	5,657	926	16.4%
Hispanic or Latino	1,911	207	0.8%

*Civilian noninstitutionalized population

A number of local organizations provide housing assistance for those with mental or physical disabilities. These agencies continue to make the case for more housing for the disabled since what housing they do have will not meet the communities they serve needs.

2.2.4 Veterans

In the State of Ohio Military Status is a protective class. It became effective March 23, 2008, including "military status" as a protected class for purposes of employment, housing, and public accommodations as a result of Governor Strickland signing into law the "Ohio Veterans Package, Substitute House Bill 372. This protects current active duty servicemen, National Guard and veterans from discrimination in their housing.

This arose out of issues with spouses or significant others, both male and female, being called to duty in Iraq, Afghanistan, or other locations and finding landlords



issuing evictions to their families accusing that the remaining tenants will not be able to afford the rent or will leave the unit before the lease has expired.

Although the federal Uniformed Services Employment and Reemployment Rights Act (USERRA) already protects military service, the new amendments broaden this protection at the state level and make remedies more accessible through investigation by the Ohio Civil Rights Commission. The law also requires the Ohio Attorney General’s Office to assign a staff person to ensure the complaints are handled quickly. Another, more immediate effect: employers will need to re-word all of their EEO/discrimination policies and posters to include “military status” as a protected category.

Table 2.9 shows the 1,031 Veterans in Sandusky by service. Viet Nam veterans are the largest service as of 2020. The two Gulf Wars when combined had 20.1% of service. The WW2 and Korean Veterans made up 14.6%.

Table 2.9 - Veterans and War Served - City of Sandusky - 2020

Veterans	WW 2	Korea	Viet Nam	Gulf I (1990-2001)	Gulf II (2001 or Later)
1,031	5.6%	9.0%	55.3%	12.6%	17.6%

Table 2.10 shows veterans by the degree of their disability in 2020. The majority of veterans have a ten to twenty percent (10-20%) disability, with the second largest those veterans with fifty to sixty percent (50-60%) disability. This information is important because it gives an indication of the need for accessible housing, accessible public spaces and medical need for the future. With the continued military conflicts and aging veterans the need for assistance will increase.

It should be noted that the information in Table 2.10 is collected for people who reported having a VA service-connected disability rating. These ratings are graduated according to degrees of disability on a scale from 0 to 100 percent, in increments of 10 percent. A zero-rating, which is different than having no rating at all, means a disability exists but it is not so disabling that it entitles the veteran to compensation payments.



Table 2.10 Disabled Veterans Sandusky - 2014

	Number	Percent
Total	1,031	-
Has no service-connected disability	715	69.5%
Has a service-connected disability	316	30.6%
Degree of Disability		
0 percent	28	8.8%
10 or 20 percent	68	21.5%
30 or 40 percent	10	3.1%
50 or 60 percent	50	15.8%
70 percent or higher	99	31.2
not reported	55	17.4

Table 2.11 shows disabled veterans by poverty by age group. This table shows that poverty is a persistent problem with veterans. Again the need to address veteran disability and poverty will continue to grow as military conflicts and aging continue.

Table 2.11 - Age of Veteran Status by Poverty Status - 2020

Age	Number	# Veteran Income Below Poverty Level	# Disabled	# Veteran Income At or Above Poverty Level	# Disabled
18-34	1,020	127	65	893	349
35-45	4,867	216	148	4,651	390
55-64	4,398	381	139	4,017	1,340
64 +	9,777	457	142	9,320	3,230

2.2.5 Age

Table 2.12 compares the 2010 population by age to the 2020 distribution for the City. In Sandusky in 2010, 15% of the population is over the age of 65 by 2020 this had risen to 17.3%. In 2010 more than 58% were working age (20-64), 26% are less than 19 and 7.3% are 5 years or under. By 2020 working age had dropped to 52% and those under 19 had dropped to 18.9%, those 65 and older rose to 17.3%. These changes between 2010 and 2020 corresponds to the overall drop in population and the



possibility of out migration of working age and younger populations from the City.

Table 2.12 - Age Distribution - City of Sandusky - 2010 - 2020

Age Group	2010 People In Age Group			2020 People in Age Group		
	Male	Female	Total	Male	Female	Total
<5	964	925	1,889	853	852	1,705
5-9	820	820	1,696	841	579	1,420
10-14	803	803	1,541	631	750	1,381
15-19	746	746	1,575	783	738	1,521
20-24	827	827	1,746	623	1,012	1,644
25-34	1,609	1,609	3,366	2,012	2,159	4,171
35-44	1,390	1,390	2,858	1,193	1,421	2,614
45-54	1,863	1,863	3,839	1,598	1,464	3,062
55-59	852	852	1,764	765	959	1,724
60-64	730	730	1,545	495	969	1,464
65-74	873	873	1,869	1,238	1,347	2,585
75-84	505	505	1,351	490	755	1,245
85+	207	207	654	145	292	437
Total Population	17,289	13,504	25,793	11,337	13,297	24,634
Median Age in Years	37	39.7	38.5	37.5	36.3%	38.0%



2.3 Income Characteristics

2.3.1 Median Family and Household Income

Section Notes:

Median household income is based on the definition that a household includes all the people who occupy a housing unit as their usual place of residence.

A family is defined by the US Census Bureau as a group of two or more people who reside together and who are related by birth, marriage, or adoption. Family income is based on this definition.

Per capita income refers to how much each individual receives, in monetary terms. It is the measure of the amount of money that each person earns in the designated area, State, City, County, Census Tract.

Information was suppressed in cases where the sample was less than 10 of the unit that is being described (eg., households, people, householders, etc.). In these cases the designation is shown by N/A or Not Available.

The number of households divided by income is shown in Table 2.13, comparing the City of Sandusky and Erie County. The *median household* income for the City of Sandusky was \$55,173 compared to Erie County’s median of \$74,900 as estimated in 2020. In 2020, over a third of the households in the City earned less than \$25,000 a year, 30.4%, compared to 15.1% in Erie County. The poverty rate for a family of four is \$27,750, which means 3,396 households could be living in poverty, and the majority of those earning less that \$50,000 could be in poverty.

Table 2.13 - Household Income City of Sandusky- Erie County - 2020

	Number of Households	Percent of Households	Number of Households	Percent of Households
Annual Household Income	Sandusky	Sandusky	Erie County	Erie County
Less than \$25,000	3,396	30.4%	5,035	15.1%
Less than \$50,000	6,531	58.4%	11,784	35.2%
Less than \$75,000	8,417	75.4%	18,431	55.1%
Less than \$150,000	10,691	95.7%	29,584	88.4%
\$150,000 or more	467	4.2%	3,862	11.5%
Total Households	11,167	-	33,454	-

In 2020 over half of the households in the City, 58.4%, earned less than \$50,000. In the County over a third earned less than \$50,000, 35.2%. In the City 75.4% of households earned less than \$75,000 a year and 95.7% earned less than \$150,000. For the County it was 55.1% earning less than \$75,000 and 88.4% earned less \$150,000. In the City only 4.2% of the households earned \$150,000 or more a year, for



the County it was 11.2% of households.

Table 2.14 gives the income characteristics for the City of Sandusky, its census tracts and comparisons to Erie County by race for 2020. In 2020 the median family income was \$55,173 in Sandusky compared to \$74,900 in the County. Tract 408.02 had the highest median family income at \$71,616, Tract 407 was second with \$70,088. Tract 410 had the lowest median family income at \$44,036.

White median household income was 28% higher than Black median household income. This was true in all census tracts of Sandusky except Tract 408.02 where Blacks median household income was 69% higher than Whites. This could be due to the fact that the Black population in Tract 408.02 is smaller and therefore the household income sample would be smaller and could give higher income. But, never the less it takes nothing away from the fact that Whites have a considerable advantage in terms of median household. This is especially true in Tract 409 where Whites have a 61% higher median household income than Blacks. This follows historic trends in the state and nation that Whites consistently show higher incomes than minorities.

Table 2.14 - Income Characteristics by Jurisdiction Sandusky - 2020

Community	Median Household Income	Median Family Income	Per Capita Income	Median Household Income White	Median Household Income Black	Median Household Income Hispanic
Sandusky	\$42,140	\$55,173	\$26,138	\$43,988	\$31,856	\$58,279
Erie County	\$60,149	\$74,900	\$35,100	\$64,255	\$31,569	\$59,010
407	\$45,483	\$70,088	\$29,439	\$44,528	\$42,770	\$87,827
408.01	\$28,267	\$28,878	\$17,598	\$28,380	N/A	N/A
408.02	\$25,272	\$71,616	\$23,767	\$18,990	\$60,688	N/A
409	\$42,047	\$53,083	\$32,785	\$47,344	\$18,680	N/A
410	\$34,450	\$44,036	\$20,700	\$44,647	\$28,488	\$93,366
411	\$45,357	\$57,438	\$21,892	\$56,750	\$40,735	\$44,128
412	\$47,115	\$55,815	\$22,564	\$48,500	\$36,702	N/A
413	\$39,345	\$54,688	\$30,609	\$57,813	\$30,585	N/A

Overall for Sandusky the Median household income for Hispanic/Latinos was 25% higher than Whites and 45% higher than Blacks. Median household income for



Hispanic/Latinos by tract had little reporting due to the size of the Hispanic/Latino population within the tracts. This can also skew the income that is reported since when populations are small the income reported can seem to be higher and skew the results, but it still shows that in some tracts Hispanic/Latinos have significantly higher median incomes than other races.

2.3.2 Poverty

Table 2.15, Percent Poverty by Race, shows the poverty rates for Sandusky and comparing to Erie County for 2020. The Poverty Rate for all people was 22.6% for the City compared to the County with 12.1%. In the City the poverty rate for Whites was 19.7%, for Blacks it was 28.3%, one and half times greater than that for Whites. The Hispanic poverty rate was 33.6%, 1.7 times greater than Whites. This reflects the economic conditions of the area with the closing of major industries and the overall slow return of economic growth in the area and State. The strength of the amusement industry in the City has continued to help economically, however it is mainly a warm weather business that often does not provide year round employment. There are other industries that are thriving and provide full time employment year round, even taking those into consideration, often there are still not enough jobs paying a living wage to help keep families out of poverty. In a later section of the AI we discuss the cost of affordable housing and the impact on families.

Data has long supported that Blacks and other minorities suffer greater economic distress than Whites and the increases in poverty rates for the Blacks and Hispanic/Lation population supports this assumption. In Sandusky in five of the eight tracts Blacks had a higher poverty rate than Whites, Tracts 409, 410, 411, 412 and 413.

Hispanic's poverty rates follow much the same trend of that of Blacks. Hispanic/Latinos do have a smaller presence in most of the tracts in the City and in some they do not meet the reporting threshold. The Hispanic poverty rate is higher than that of Blacks even though their percent of population (5.8%) is lower than that of Blacks (22.8%.) In five of the six tracts that Hispanics/Latinos report data they had higher poverty rates than Blacks and Whites.



Table 2.8 - Percent Poverty by Race - City of Sandusky - Erie County - 2020

	% All People in Poverty	% Whites In Poverty	% Blacks In Poverty	% Hispanic's In Poverty
Sandusky	22.6%	19.7%	28.3%	33.6%
Erie	12.1%	9.4%	27.5%	19.7%
Block Groups				
407	14.5%	20.5%	12.3%	41.3%
408.01	34.2%	23.2%	2.4%	0.0%
408.02	45.5%	44.0%	9.6%	73.6%
409	22.6%	13.2%	44.6%	0.0%
410	29.4%	18.5%	34.7%	0.02%
411	16.7%	7.3%	14.3%	18.3%
412	22.5%	28.4%	29.3%	34.4%
413	20.1%	16.7%	16.2%	29.1%

Table 2.16 demonstrates the effects of poverty status on family type and age for the City and County for comparison. The table shows that of those that the Census determined poverty for (24,697) 20.5% of all people lived in poverty in the City, for the County (74,100) it was 11.5%. In terms of age for the City those under the age of 18 had the highest poverty rate based on age with 31.1%, next 18 to 35 years of age with 20.4%. The under the 18 age group indicates that those who are most venerable have over a quarter of their population in poverty. This places added burden on families, area agencies, and City resources to provide assistance. It is just not the young that require assistance that are already stretched, seniors (those 65 years or older) had a poverty rate of 14.2% in the City. These figures give the City an idea of where problems are and where they will be in the future. It is clear the poverty rates will not decrease in the future, but it is also clear that resources to help those in most need will need at a minimum to stay the same if not increase.



Table 2.16 - Poverty By Age, Sex and Family - 2020

	Sandusky	Erie County
Population Poverty Was Determined for - #/%	24,697 20.5%	74,100 11.5%
Age under 18	31.1%	17.2%
Age 18 - 64	18.4%	10.4%
Age 18-34	20.4%	13.0%
Age 35-64	17.0%	9.1%
Age Over 65	14.2%	9.0%
All Families	18.6%	5.5%
Male	18.2%	10.3%
Female	22.5%	12.6%
Female Headed Households	28.3%	21.1%

In terms of families in the City of Sandusky, 18.6% are in poverty compared to 5.5% in the County. As expected females have an higher poverty rate, 22.5%, than males, 18.2%. This is especially true for female headed households whose poverty rate was 28.3%, the highest of any family designations. Female headed households tend to be the highest poverty rate of family’s nationally. Poverty rates among female headed households with children, when compared with other household types, raise serious questions about the implications of changing family and household structure for economic and other well-being outcomes of children and women.

Table 2.17 considers poverty rates by education for those 25 years or older. Those with a less than a high school graduate had a slightly higher poverty rate, 20.4%, than those with a high school diploma, 20.6%. Higher education levels cut the poverty rate almost in half, those with some college or a Associate Degree had a 12.2% poverty rate compared to those with a Bachelor Degree or higher with a 12.8% poverty rate. It is clear the education improves ones changes of earning a better living by comparing the poverty rates in Table 2-17. A focus on higher education should also include technical schools and other alternate career paths.



Table 2.17 Poverty By Education Attainment - 2020

	Sandusky	Erie County
Population 25 Years +	16.6%	9.5%
Less Than High School Grad.	20.4%	18.5%
High School Grad. Or Equivalent	20.6%	12.9%
Some College Or Associate Degree	12.2%	7.8%
Bachelor's Degree or Higher	12.8%	4.6%

Table 2-18, Poverty by Employment Status and Work Experience, indicates that those in the civilian labor force have a 10.6% poverty rate in the City compared to a 5.4% in the County. Those employed had an overall 7.9% poverty rate, employed males were at 4.6% and females were more than twice as high at 10.7%. Obviously for those unemployed the overall poverty rate was almost 5 times greater than employed at 37.4%. Unemployed females had a rate close to double that of males, 29.7%, at 48.5%. When analyzing these figures it is important to realize that many of these are the working poor, those that are trying to keep their heads above water and to meet the needs of the or families and their own needs. This is especially true of female headed households.

The next area of poverty is for those who are employed year round, the poverty rate was 2.7%, for those working part time or only part of the year the poverty rate was 22.6% and for those who did not work it was 32%. These rates are not surprising considering that those that work would have a somewhat lower poverty rate than those that have limited or no employment.



Table 2.18 Poverty By Employment Status & Work Experience - 2020

	Sandusky	Erie County
Civilian Labor Force 16+	12,892 - 10.6%	38,065 - 5.4%
Employed	11,677 - 7.9%	35,755 - 4.2%
Male	4.6%	3.5%
Female	10.7%	5.0%
Unemployed	37.4%	23.2%
Male	29.7%	18.8%
Female	48.5%	29.1%
Civilian Labor Force 16+	19,840 - 17.5%	60,833 - 9.9%
Worked Full Time Year Round	2.7%	1.8%
Worked Part Time or Part-Year	22.6%	12.2%
Did Not Work	32.0%	18.2%

2.4 Ancestry and Language

According to Workplace Fairness and other resources, language discrimination is a part of national origin discrimination. Language discrimination refers to the unfair treatment of an individual based solely upon the characteristics of their speech; such as, accent, size of vocabulary, and syntax. It can also involve a person’s ability or inability to use one language instead of another. Because language discrimination is a form of national origin discrimination, fair housing law prohibits it. This type of discrimination generally makes it illegal to prefer one language over another, though there are many exceptions. The driving force behind the illegality of language discrimination is whether or not an individual was denied housing, a loan, homeowners insurance or must speak one language over another for a discriminatory purpose to access their rights to housing.

The same goes for discrimination based on Ancestry. Covered under the protected class of National Origin, discrimination is different treatment in housing because of a person’s ancestry, ethnicity, birthplace, culture or language, and it is illegal. People cannot be denied housing because they or their family are from another country, because they have a name or accent associated with a national origin group, because they participate in certain customs associated with a national origin group or because they are married to or associate with people of a certain national origin. In September of 2023 HUD reiterated this protection class when HUD Secretary Marcia Fudge stated, “Antisemitism, Islamophobia, and any other form of hate have no place anywhere,



including in the home,” Fudge said in a statement. “No one should be discriminated against because of their ancestry or ethnic characteristics or their faith or beliefs.”

Looking at Table 2.19 shows the number of foreign born in the City of Sandusky by the ancestry/nationalities. The vast majority are native born in the United States, 24,486 and speak English only, 22,263. Foreign born European residents, 152, were the second largest ancestral location and Latin America was third with 97, born in Africa was third with 84 residents.

In terms of language spoken the second highest after English was Spanish at 623 and third was a *Language Other Than English - Speaks English Less Than Very Well* at 456 and a group that spoke *Other Than English* was also prevalent, 1,008. These two categories, while higher than some specific languages spoken do not speak to specific languages in the discussion. Non English speaking residents make up 9.7% of the population of the City.

Table 2.19 - Number of Foreign Born by Place/Area and Language Spoken 2020

Place/Area	Number
Native Born U.S.	24,486
Foreign Born Europe	152
Foreign Born Latin America	97
Foreign Born Africa	84
Foreign Born Asia	49
Language Spoken (age 5+)	Number
English Only	22,263
Language Other Than English Speaks English Less Than Very Well	456
Spanish	623
Indo-European	237
Asian	60
Other Than English	1,008



Table 2.20 - Ancestry By Country - City of Sandusky - 2020

Country	Number
U.S. or American	835
German	6,224
Irish	3,113
English	1,608
Italian	1,531
Polish	462

Table 2.20 shows the Ancestry of the residents of City. These are the six largest nationalities that residents identify with. German ancestry is largest with 6,224, Irish is second with 3,223 and English is third with 1,608. U.S./American was fifth with 835.

3.0 TRANSPORTATION, HOUSING AND ECONOMICS

3.1 Transportation

Sandusky Transit promotes efficient and economic public transportation, which encourages economic development and increases opportunities to enhance independence and the quality of life in Sandusky. The Sandusky Transit System is partially funded by the City of Sandusky, City of Vermillion, the Ohio Department of Transportation and the Federal Transit Administration.

The system only operates route connecting throughout the City and to Vermillion into Erie County. The system operates 6 Routes - Red, Blue, Orange, Purple, Green, Yellow, from as early as 5am to 12:30am depending on the route, Monday through Saturday. Dial-A-Ride fares are \$3.00 in the City of Sandusky and \$5.00 in Erie County. Children under five years of age ride free, reduce fare service for those over 65 or with a qualifying disability is also available. Fixed Route fares are \$1.50 and up, Paratransit eligible persons ride for \$3.00 with a valid pass. Children are free with an adult. Transfers are free, with a valid pass.

The systems Dial-A-Ride program is a curb-to-curb service available only for LCT customers living and/or traveling to points within the specific boundary area (an area ¾ of a mile on either side of an existing fixed route bus line), in accordance with the Americans with Disabilities Act (ADA).



While the public transportation system is a viable option for residents of the City, the nature of its service can have an impact on local citizens in terms of using it as a regular travel to work system. It's cost, time table and routes can offer the persons in poverty, seniors or limited incomes a reasonable alternative mode of transportation to and from work. It also gives access to local service providers which will enhance their quality of life, and the ability of persons with limited income to access employment opportunities. Persons with limited income and persons with physical disabilities are more likely to depend on transportation provided publicly or by a local service provider in order to maintain employment and/or to meet daily needs.

The County is served by the Ohio Turnpike, Interstate 90 major east west transportation route that connects many manufacturing plants throughout the County and surrounding areas, to the east Cleveland and to the west Toledo, as well as US Route 2 which follows Lake Erie. Table 3.1 shows the various modes that residents use for travel to and from work. As expected the typical mode to work was using ones own car, 9,439 workers used the mode driving alone. Next highest was car pooling at 1,288 and third was those using some other means of transportation at 363.

The majority of workers drove less than ten minutes to work, followed by those driving less than 15 minutes and those driving less than 20 minutes. Almost a 1,000 workers drove between 30 and 34 minutes to work.

Table 3.1 - Mode To Work for Work Force 16+ - City of Sandusky - 2020

Mode To Work - Work Force 16+	Number
Car - Drove Alone	9,439
Carpooled	1,288
Public Transportation	111
Walked	82
Other Means	363
Worked at Home	167



Table 3.2 - Travel Time to Work - City of Sandusky - 2020

Travel Time	Number
<5 Minutes	962
5 - 9 Minutes	2946
10-14 Minutes	2670
15 -19 Minutes	2500
20 -24 Minutes	682
25 - 29 Minutes	279
30 - 34 Minutes	944
35 - 39 Minutes	178
40 - 44 Minutes	144
45 - 59 Minutes	240
60 - 89 Minutes	206
90+ Minutes	232

3.2 Economic Conditions

Sandusky's largest businesses include - Manufacturing. Tourism and Hospitality, Educational, Health, and Social Assistance. Especially around the City there is urban and industrial, yet agriculture still plays a role in the local economy. This is particularly true farther south in the County.

According to the Erie County Economic Development Corporation's profile of the workforce in City of Sandusky the employment rate of 59.3%, the average earnings per job is \$56,600, private sector employment is 76.6% and 16.7% have a Bachelors Degree or Higher.

Table 3.3 shows the five largest employers in the City. Firelands Regional Medical Center was the largest employer 4,300 employees at two campuses. Cedar Fair the owner of Cedar Point and other amusement parks was second with 2,200 in the City.



Table 3.3- Five Largest Employers - City of Sandusky - 2022

Industry	Activity	Employees
Firelands Regional Medical Center	Medical/Hospital	3,000
Cedar Fair	Entertainment	2,200
Firelands Regional Health System	Medical Management	1,300
Magnum Management Corporation	Corporate Consultant	800
Kyklos Bearing International	Automotive Bearing Manufacturing	750

Table 3.4 shows the percent of employment of the 10 largest industry according the 2020 Census for the City. This information is based on those in the workforce in the City that are 16 years or older.

The top three industries are all within a few tenths of a percent of one another. Production, Transportation and Materials Handling was the top industry with 24.6 % of the workforce. Service Occupations were second with 24.5% of the workforce and Management, Business, Science and the Arts was third with 23%. Sales and Office workers and Manufacturing Workers were basically tied at 20%. Entertainment, Recreation and Accommodation with Education Services, Health Care and Social Assistance were close with 19.6% and 18.9%. The last industries were Retail Trade and Natural Resources/Maintenance at 12.1% and 7.8%.



2020

Industry	Percent
Number in Workforce 16+ - 11,766	
Production, Transportation, Materials Moving	24.6%
Service Occupation	24.5%
Management, Business, Science, & Arts	23.0%
Sales/Office	20.1%
Manufacturing	20.0%
Arts, Entertainment, Recreation, Accommodation, Food Service	19.6%
Education Services, Health Care, Social Assistance	18.8%
Retail Trade	12.1%
Natural Resources, Maintenance	7.8%

Table 3.5 indicates the source of a workers wage in the City in 2020. The vast majority of workers are paid through private industry or source, 91.5%.

Table 3.5 - Source of Workers Wage - City of Sandusky - 2020

Wage Source	Percent
Private Wage/Salary	91.6%
Government	10.2%
Self Employed	7.7%
Unpaid	0.6%
Based on Workforce of 16+ - 11,766	100%

Unemployment continues to be a closely watched nationally and in the City of Sandusky. Unemployment rates are one of the signs of the economic health of the community. In the past rates have been high and in very recent years they have been dropping, statewide and nationally. Table 3.6 shows the unemployment rate for the ten year period from 2013 to 2023. The two highest years were 2013 (8.9%) and 2020 (13.6%), 2020 was the beginning of the COVID-19 years and that probably had something to do with the higher rate as business closed or cut back. Over the ten year period the City averaged a 7.5% unemployment rate with lowest year being 2019. The State of Ohio consistently experienced unemployment rates lower than the City except



for 2019 when the State had a rate of 8.9% to the City's 5.9%.

Since unemployment rates have consistently been higher than the nationally and state rates. Unemployment is going to continue to place pressure on services from the City, social service agencies and others. The increases in unemployment make it hard for the City to meet the needs of those residents in most need. It is a vicious circle that seems to have little indication of stopping in the near future. The more that are unemployed the greater the need for affordable housing, safe and sanitary housing, medical assistance, public transportation, food and other services. Yet the number of dollars the City has to meet these needs has decreased and funds are becoming less available much quicker than in previous years.

Table 3.6 - Employment/Unemployment - 2013-2023

Year	Period	Labor Force	Employment	Unemployment	Unemployment Rate Sandusky	Unemployment Rate Ohio
2022	Annual	11,400	10,800	600	6.5%	N/A
2021	Annual	11,700	10,700	900	8.1%	4.0%
2020	Annual	11,700	10,100	1,600	13.6%	5.1%
2019	Annual	11,800	10,100	700	5.9%	8.2%
2018	Annual	11,900	10,200	700	6.2%	4.2%
2017	Annual	12,100	10,200	800	6.9%	4.5%
2016	Annual	11,800	11,100	700	6.1%	5.0%
2015	Annual	118,000	11,100	700	5.9%	5.0%
2014	Annual	11,900	11,000	800	7.2%	5.8%
2013	Annual	12,200	11,100	1,100	8.9%	7.5%

3.3 Housing Affordability

Table 3.7, General Housing Profile 2020, provides a number general profiles for the City. One of the key statistics is the Owner Occupied Housing (52.2%) and Renter Occupied Housing (47.8%) is almost split fifty/fifty. This is somewhat concerning because a community would like to have a higher percentage of owner occupied housing than renter. The Department of Housing and Urban Development in a 2020 report, *Homeowning, Social Outcomes, Tenure Choice, and U.S. Housing Policy*,



“found that home ownership produces desirable social outcomes such as better neighborhoods, more civic participation, and more socially healthy children.” Also, owners are more likely too maintain their homes by doing repairs, adding additions, improving their yards. This has a positive impact on the neighborhood and community in general.

Table 3.5 General Sandusky Housing Profile -2020

Label	2020	Percent
Occupied Housing Units	11,191	-
HOUSING TENURE		
Owner Occupied	5,841	52.2%
Renter Occupied	5,350	47.8%
Average Household Size Owner	2	-
Average Household Size Renter	2.02	-
Vacancy Rate Owner	2.4	-
Vacancy Rate Renter	8.4	-
MONTHLY HOUSING COST		
Median Rent	\$855	-
Median Mortgage (SMOC)*	\$1028	-
ROOMS		
1-2 Rooms	708	2.6%
3-4 Rooms	3,056	11.3%
5-6 Rooms	5,816	21.6%
7-8 Rooms	2,723	10.1%
9 Rooms +	1,184	8.8%
Median # of Rooms	5.5	-
*SMOC - Selected Mortgages Owner Coasts		

Table 3.5 indicates that of the 11,191 occupied housing units there was a vacancy rate of 2.4% for owner housing which means that the owner occupied housing market is fairly tight in terms if available units. In the rental housing market the vacancy rae was 8.4% which indicates that at the time the market was somewhat open. Household size for owners and renters was the same at two persons per household. Median rent is



\$855, below we will discuss the affordability issue in the rental markets. Median Mortgages was \$1028.

Communities across the country are recognizing the importance of affordable housing to their future economic and social well-being. Economic growth is at risk when growth in jobs and population are not matched by the growth in the supply of affordable housing. For businesses, the ability to attract and retain labor depends partly on the availability of decent and affordable housing.

Among the social concerns are basic issues of equity for low-moderate income working families. In many communities, people who provide the bulk of vital services - teachers, firefighters, police officers, factory workers and restaurant workers - often find themselves cannot afford to live there. Yet, it is often in these communities that affordable housing for working families is most needed and that the most opposition to such housing exists. Moreover, a host of social problems can occur when working families face a shortage of affordable housing. Family disruption, overcrowding and congestion degrade the quality of life in the communities for all residents.

According to a study by the National Low Income Housing Coalition (NLIHC) on housing affordability in Ohio, the Fair Market Rent (FMR) for a two-bedroom apartment is \$993. In order to afford this level of rent and utilities, without paying more than 30 percent of income on housing, a household must earn \$3,308 monthly or \$39,702 annually. Assuming a 40-hour work week 52 weeks per year, this level of income translates into a Housing Wage of \$19.09 per hour.

In Ohio, a minimum wage worker earns an hourly wage of \$10.10. In order to afford the FMR for a two-bedroom apartment, a minimum wage earner must work 76 hours a week, 52 weeks per year. Or, a household must include 1.9 minimum wage workers working 40 hours a week year-round in order to make the two bedroom FMR affordable. To afford a one bedroom rental home a minimum wage earner must work 60 hours a week or must include 1.5 minimum wage workers working 40 hours a week to afford the one bedroom home. In Ohio, the estimated average wage for a renter is \$18.47 an hour,

The Table 3.8 below breakouts the affordability issues for Erie County. Data for the Sandusky was not available. However since most work is regional in nature and that the City makes up over half of the population, the data for the County is very applicable to the Sandusky.

Based on data in Table 3.6 a two-bedroom in the County would require an hourly wage of \$17.54 of monthly income, needing an annual income of \$36,480. With current



wages in the County the most a family could pay for rent without exceeding 30% would be \$650. It would require 1.3 full time jobs to at the average renter wage to afford a two bedroom unit at fair market rent.



Table 3.6 Rental Housing Affordability - 2023

	Ohio	Erie County
NUMBER OF HOUSEHOLDS		
RENTER	1,588,226	16,969
PERCENT RENTERS	33%	30%
HOUSING WAGE		
TWO BEDROOM	\$19.09	\$17.54
FAIR MARKET RENT		
TWO-BEDROOM	\$993.00	\$912.00
ANNUAL INCOME NEEDED TO AFFORD FMR		
TWO-BEDROOM	\$39,702.00	\$36,480.00
MINIMUM WAGE		
MINIMUM WAGE	\$10.10	\$10.10
RENT AFFORDABLE AT MINIMUM WAGE	\$525.00	\$525.00
WORK HOURS/WEEK AT MINIMUM WAGE		
TWO-BEDROOM	76	76
RENTER WAGE		
ESTIMATED MEAN RENTER WAGE	\$18.47	\$14.00
RENT AFFORDABLE AT MEAN RENTER WAGE	\$961.00	\$728.00
FULL TOWN JOBS AT AVERAGE NEEDED TO AFFORD		
TWO-BEDROOM	1	1.3
INCOME LEVELS		
30% OF AREA MEDIAN INCOME (AMI)	\$27,485.00	\$25,980.00
ESTIMATED MEDIAN INCOME	\$91,618.00	\$86,600.00
RENT AFFORDABLE AT DIFFERENT INCOME LEVELS		
30% OF AREA MEDIAN INCOME (AMI)	\$687.00	\$650.00
ESTIMATED RENTER MEDIAN INCOME	\$2,290.00	\$2,165.00



Affordable rental housing continues to be a major issue in housing in Sandusky. While the figures given are for Erie County, a look at the newspaper rental housing section shows that affordability is still an issue. The next hurdle a family in Sandusky must jump is the lack of affordable housing that is safe and sanitary. The underlining issue with this is that many times the very housing that families can afford might be closed because of quality issue that the landlord does not repair and thus the family becomes homeless when the unit is condemned. This is especially the case in many of sleeping room only units in and near downtown.

While the drop in average home price is encouraging in that more people might be able to afford buying a home it is discouraging in that it means fewer values for the current home owner, less in property taxes, and could lead to higher foreclosures when home owners who are over extended try to sell their homes and find that the appraised value is less than what they originally paid for it.

Ultimately, affordable housing is not only a question of bottom line economics, but of equity. The housing cost and wage review in this section attempts to put a “face” on the affordable housing problem confronting many working families.

4.0 Local Fair Housing Programs and Activities

There are numerous federal laws that cover fair housing including the following: Fair Housing Act and other civil rights laws, including Title VI of the Civil Rights Act of 1964, Section 109 of the Housing and Community Development Act of 1974, Section 504 of the Rehabilitation Act of 1973, Title II of the Americans with Disabilities Act of 1990, the Age Discrimination Act of 1975, Title IX of the Education Amendments Act of 1972, and the Architectural Barriers Act of 1968. All of these federal actions are part of every County’s responsibility when conducting business. HUD does require through its community development regulations that all entitlement jurisdiction affirmatively further fair housing. It is the decision of the jurisdiction on how this is done but at the least a basic fair housing program is needed.

The Sandusky offers a comprehensive Fair Housing Program through its contract with Donald B. Eager and Associates, fair housing consultants with over thirty years in fair housing program operation and development. This program includes three major components:

Outreach - Through years of fair housing program experience, Donald B. Eager & Associates has found working with community groups and organizations to be necessary in the operation of a successful fair housing program. Ongoing



comprehensive education of agency staff and clients establishes a community accessibility that no amount of marketing can provide. Clearly, community groups and organizations have daily contact with residents of all walks of life. Only by a cooperative effort with these groups are we, as fair housing service providers, able to reach those in most need of the protection that fair housing law provides.

Outreach services work in two ways:

1. Education of staff and clients (where possible) to address housing related issues and remove barriers to affordable housing
2. Distribution of fair housing and fair housing related posters, brochures and other informational materials

Offer fair housing training sessions each year. The training is designed to meet the needs of the organization, staff and clients. However, the basic format will be a course in Fair Housing and Landlord/Tenant Regulations, Fair housing materials and handouts are dispersed at all training.

Documentation for each training is inclusive. It includes all information connected to the training: a sign-in sheet, comprehensive minutes describing the meeting, a list of various materials distributed, a copy of all advertising, list of mailing labels and copies of all flyers, letters, etc. created to market the training.

Distribution twice a year during fall and spring of Sandusky Fair Housing information/education materials to community groups and organizations typically by mail or hand delivery:

Materials will be distributed throughout the City to community service groups and organizations. Those community service groups and organizations will be asked to distribute the fair housing brochures to clients and staff

Creation and distribution of other pertinent brochures such as Tenant/Landlord, Repair to Rentals: Escrowing Rent, etc.

Education - Through years of fair housing program experience, Donald B. Eager & Associates has found working with community groups and organizations to be necessary in the operation of a successful fair housing program. Ongoing comprehensive education of agency staff and clients establishes a community accessibility that no amount of marketing can provide. Clearly, community groups and organizations have daily contact with residents of all walks of life. Only by a



cooperative effort with these groups are we able to reach those in most need of the protection that fair housing law provides.

Primary to any effective fair housing program is a comprehensive fair housing education plan. This effort works in cooperation with the enforcement effort of the program by assuring that residents of the City and all members of the housing industry (lenders, real estate professional, landlords, etc.) have access to training that will help them understand their rights and responsibilities regarding fair housing regulations.

The fair housing education program works to address typical fair housing issues such as: fair housing regulations - local, state, federal; fair housing and real estate issues; fair housing as it relates to landlord/tenant issues; predatory lending; hate crimes; and, fair housing and home ownership education. The program disperse's fair housing materials and handouts at all training.

Some of the various training opportunities offered within the community are listed below

- Landlord Training -
- Tenant's Rights Information - Training for tenants and advocate to learn about their right and responsibilities as tenants. with refreshments and door prizes.
- Fair Housing and Landlord/Tenant Regulations - Fair housing for the general public

Enforcement - The Department of Housing and Urban Development (HUD) requires fair housing programs to have in place a fair housing complaint intake and referral system. In response to this requirement, the program offers a local fair housing office telephone number and a fair housing hotline (1-800-854-0467). Both telephone numbers and the office address are printed on all informational and marketing materials. Materials are mailed to various organizations and distributed at public, civic, social service and school educational meetings throughout the program year.

Fair Housing complainants are informed of fair housing rights and remedies and mailed a fair housing complaint form, cover letter and informational materials regarding complaint procedures. A stamped/self-addressed envelope and fair housing brochures are also included with each complaint form. The complainant is asked to forward the complaint form to the appropriate agency and return a copy of the signed, completed complaint form. In addition, complainants are advised that the consultant and/or local contact person is available to assist them in person or by phone. Should the complainant prefer to deal directly with the responsible agency, the complainant is given the agency regional office address and phone number.



Although the program has no attorneys and hence do not give legal advice, program staff members have a thorough knowledge of Ohio Landlord and Tenant Law and Fair Housing Law. Staff answers the fair housing and landlord/tenant hotline five days a week during normal business hours. They provide information and counseling services to individuals and families with questions and concerns regarding landlord tenant issues. If it is determined that staff cannot be of assistance, the caller is referred to the appropriate person, agency or office. For messages left in voice-mail on the hotline after regular business hours (9:00 a.m. to 5:00 p.m.) and on holidays, a response will be made within 48 hours.

To assure that all calls are recorded for future analysis and reporting, staff has established a system to record the nature of, action taken and result of action taken on each fair housing and landlord/tenant call. A complaint intake form has been designed specifically to record all information regarding each call. The form records: date, time, name, address, referral mechanism, nature, action and result. Calls are organized into three (3) categories: Fair Housing Discrimination, Landlord/Tenant Issues and Simple Inquiries. Specifics regarding calls are included in the monthly fair housing report submitted to the Sandusky Community Development Department.

5.0 Purpose and Parameters of Community Reinvestment

For most, the goal of home ownership is contingent upon their ability to obtain a mortgage. However, the issue of color, race, national origin, sex, religion, familial status or disability may still shut the door to home ownership. National studies and litigation continue to show lenders ignoring business in low-moderate income neighborhoods and minority neighborhoods.

These discriminatory policies are holdovers from a past that would not allow loans to people who would represent an "inharmonious racial group" to neighborhoods. In the past, policies of local lenders, real estate agents and even the federal government (through the Federal Housing Administration and Veterans Administration loan policies) assured that our country would grow with segregated cities. The most basic right of all Americans, to live where they want and can afford, was denied throughout the housing market.

5.1 Payday Loans, Title Loans as Predatory

One of the largest issues facing the community and changing neighborhoods is the loss of retail and commercial business. As neighborhoods change, becoming more minority or low income, one of the first things to become apparent is the loss of businesses that



can help support and sustain the neighborhood. As cities begin to work to revitalize neighborhoods, it is important that efforts are made to revitalize the business climate as well.

Check-cashing outlets - also referred to as “currency exchanges,” will, for a fee cash payroll, government and personal checks. People use these check-cashing outlets rather than traditional financial institutions for a variety of reasons. Some do not have access to or cannot afford to use banks due to rising fees or are unable to maintain minimum balance requirements. Others have privacy concerns or do not want their funds accessible to creditors. A number of consumers use check-cashing outlets for the convenience.

Many check-cashing outlets and other companies are now offering “payday loans” which go by a variety of names: “check advance loans,” “postdated check loans,” “delayed deposit loans” or “deferred presentment loans.” While they have many names, they all have the same predatory result. Typically, the consumers write personal checks payable to the lender for a future date when they are due to repay the loan, which is generally their next payday.

Like payday loans, car title loans are marketed as small emergency loans, but in reality these loans trap borrowers in a cycle of debt. A typical car title loan has a triple-digit annual interest rate, requires repayment within one month, and is made for much less than the value of the car. Car title loans put at high risk an asset that is essential to the well-being of working families - their vehicle.

Title loans are typically made without regard to borrowers’ ability to repay. Because the loans are structured to be repaid as a single balloon payment after a very short term, borrowers frequently cannot pay the full amount due on the maturity date and instead find themselves extending or “rolling over” the loan repeatedly. In this way, many borrowers pay fees well in excess of the amount they originally borrowed.

If the borrower fails to keep up with these recurring payments, the lender may summarily repossess the car, often stripping borrowers of their most valuable possession and only means of transportation. Many times there is a used car dealer right next door to the car title lender and both are owned by the same company.

The cost for this “convenience” or “helping you out” loans can be extremely high. The “fee” being paid is really interest. In some states, a company can charge a maximum of \$15 on a \$10 loan for a two-week period, which, when considered over time, calculates to a 390% annual percentage rate (APR). Often, borrowing \$500 results in \$75 in fees and interest. As noted in the earlier section, such extremely high rates are part of the



definition of what makes a loan predatory.

Rent-to-Own companies "rent" merchandise, although the structure of the transaction is more like a loan because of the interest and credit insurance involved. These businesses charge a weekly or monthly rent for a stated period, after which the property is owned by the consumer. The store does not have to report how much it is charging in interest. If a borrower is late with a payment, there is no legal limit to how much interest the store can charge in finance charges, although the company usually repossesses the rental property. Under a typically rent-to-own contract, a consumer may pay as much as \$2,200 over two years to purchase a \$500 TV.

Obviously these types of "financing" business prey on those who are least able to afford to carry the burden. However, the "catch 22" is that there is not a reasonable alternative for low-moderate income households. Generally they cannot go to the bank to get a short term loan, nor can they get a Target, Home Depot, Best Buys, etc. card to purchase appliances or furniture. Many are working service jobs that a pay minimum wage or slightly higher which makes the lure of these lenders strong when it is the end of the month and they are out of money to pay doctors' bills, buy grocery's or put gas in the car. As gas price's rise in the Sandusky area the use of these lenders will also increase and the abuses will continue.

5.2 Sandusky Lending

This report concentrates on lenders in the mortgage lending market in the Sandusky. This review is based on 2022 Loan Application Register (LAR) reports from individual lenders.

Inadequate lending performance results in long term and far ranging community problems. Disinvestment is the most devastating result. Disinvestment in neighborhoods by lenders reduces housing finance options for borrowers and weakens competition in the mortgage market for low and moderate-income neighborhoods.

High mortgage costs, fewer favorable mortgage loan terms, deteriorating neighborhoods, reduced opportunities for home ownership, reduced opportunities for home improvement and the lack of affordable housing are only a few of the consequences of inadequate lending performance. In addition, financial decay in the business sector is also a result of disinvestment – business relocation, closure and bankruptcy. On the other hand, full service local lenders, that have traditionally served



residents and businesses, are the main cogs in the wheel that keep neighborhoods stable.

This project does not examine all lending issues as they relate to performance and service. Issues such as: comparison of loan terms and conditions; patterns of branch openings and closings; and, record of investment in community development projects fall outside the scope of the HMDA database. However, this analysis does consider race, racial population, applicant income, and income of census tracts.

This analysis should not be used to determine or identify discriminatory practices by individual lenders. It should be used as a tool to determine only the lending performance of lenders in the specific area based on HMDA data. Unregulated lenders who are not required to submit HMDA reports are not monitored and have not been included in this analysis.

5.3 Analysis

The focus of this report is on all applications (all types and purpose) and on Conventional Home Purchase applications, originations and denials. A brief discussion is included on Conventional Refinancing also. As noted above, the Federal Financial Institutions Examination Council's (FFIEC) HMDA data is compiled giving information based on MSA, County. However, not all data are available for all geographies. Information, in all of the tables related to lending throughout this analysis, is compiled from the HMDA unless otherwise noted.

HMDA data includes data for White and Black applications in the County. Data is also reported for Hispanic, American Indian, Asian and Other Race borrowers. The data is often small, less than 3% of the total mortgage activity, and on which we have performed no analysis.

Tables report data for census tract income and applicant income based on median household income low-moderate income; middle income; and, upper income. These categories are defined according to U.S. Department of Housing and Urban Development (HUD) criteria as follows:

- ✓ Low Income - <50% of median household income
- ✓ Moderate Income - $\geq 50\%$ - < 80% of median household income
- ✓ Middle Income - $\geq 80\%$ - <100%
- ✓ Middle Income - $\geq 100\%$ - <120%*
- ✓ Upper Income - $\geq 120\%$ of median household income

Our analysis of racial equity looks at both origination yields and denial rates. Traditionally, many CRA studies have utilized denial rates or Black/White disparity



ratios as the prime indicator of lending performance. This report focuses on loans originated and loans denied. Since both are significant, we look at what a lender *did* as well as what a lender *did not* do.

There are also philosophical reasons for giving at least as much attention to those loans which were made as contrasted with those which were not. In this study, philosophical and methodological reasons both point in the direction of giving greater emphasis to lenders' performance on mortgage loan originations than on mortgage loan denials.

5.4 Mortgage Activity

Table 5.1 indicates all applications made, the total value and the average application value on home related loans for the County. There were over 2,600 convention home loan applications with a total value of over \$409 million and an average application value of over \$153,000. For FHA (Federal Housing Administration) there were over 450 applications with a total value of over \$69 million, with an average application value of \$151,000. VA (Veterans Administration) applications were over 200 with a total value of over \$49 million and an average application value of \$181,618.

Table 5.1 - Number of Applications by Type 2022

	APPLICATIONS	TOTAL VALUE	AVERAGE VALUE OF APPLICATION
Conventional Single Family Purchase	2,662	\$409,340,000	\$153,771
FHA	460	\$69,790,000	\$151,717
VA	225	\$49,945,000	\$181,618
Total Home Mortgage	3347	\$529,075,000	\$158,060
Conven. Refinancing	390	\$58,540,000	\$150,102
Conven. Home Improvement	292	\$28,010,000	\$95,924

Now that we know what applications have been received by the over 200 active lenders in the County let's discuss what happened to those applications.

Table 5.2 shows action taken by loan type for 2022. All Loans had a origination rate of 56.7% (1899), with a denial rate of 15.5% (521). A somewhat red flag is the number of applications withdrawn by applicant at 441 of 13.2% almost matching the denial rate.



Conventional Refinancing and Home Improvement applications were 390 and 292 respectively. Refinancing loans were valued at over \$58 million with an average application value of \$150,102. Home Improvement applications had a total value over \$28 million and an average application value of \$95,924.

Table 5.2 - Action Taken on All Applications by Type - 2022

Action Taken	Number	Total Value
ALL LOANS		
Loan Originated	1,899	\$316,275,000
Application approved but not accepted	77	\$10,755,000
Application denied	521	\$64,265,000
Application withdrawn by applicant	441	\$74,875,000
Preapproval request denied	3	\$625,000
CONVENTIONAL HOME PURCHASE		
Loan Originated	1,599	\$262,395,000
Application approved but not accepted	67	\$8,805,000
Application denied	421	\$46,155,000
Application withdrawn by applicant	324	\$53,660,000
Preapproval request denied	3	\$625,000
REFINANCING		
Loan Originated	241	\$34,255,000
Application approved but not accepted	9	\$1,415,000
Application denied	80	\$12,730,000
Application withdrawn by applicant	72	\$13,570,000
Preapproval request denied	0	\$0
HOME IMPROVEMENT		
Loan Originated	130	\$14,620,000
Application approved but not accepted	3	\$305,000
Application denied	118	\$8,620,000
Application withdrawn by applicant	31	\$3,525,000
Preapproval request denied	0	\$0



The fact that across all mortgage types there were 3,347 applications valued at over \$529 million with an average application value over \$158,000 the housing market in the County, including the City of Sandusky which has more than half the population and housing, is healthy and has a solid foundation for growth.

These were applications that were submitted but some time during the process the applicant decides to withdraw the application. This could be due to a change in interest rates, a failed home inspection, change in loan parameters, or change in applicants situation. Considering these various possibilities it is still concerning that over 18% of applications were withdrawn.

Conventional Home Loans had an approval rate of 60% (1,599) of all Conventional applications and a denial rate of 15.8% (421). Again the rate of applications withdrawn by applicants was high at 12.2%. A look at historical records show that in the year previous in 2021 there were 3,349 total Conventional home loans and 71.5% of those were originated (2,396) and 485 were denied at a rate of 14.4%. The denial rate was slightly higher in 2021 than in 2022 by 2.2%, but the origination rate was over 10% higher.

It would seem that origination rates are within the norms when compared to rates nationally and in the state. The problem's arise when we view the originations and denials based on race in the County for 2022. Table 5.3 looks at lending based on the race, ethnicity of the applicant for home loans. It is obvious that looking at the numbers Blacks do not fare well in the number of applications for home loans. With over 20% of the population in the City it would be hoped that they would come near that number in the percent of applications received from home loans. Even considering that the data is County wide the fact that 5% of all home loans are from Blacks is still very concerning. When you take into account that their average loan application is \$60,000 less than Whites it adds to the concern. The loan data for Hispanic/Latino loan data shows that they fall just below their 3.0% of the population.



Table 5.3 - Home Loan Application Action by Race 2022

	White	Black	Hispanic/Latino
Applications	2323	133	62
Median Loan Amount	\$156,095	\$93,433	\$123,292
Approved	1472	57	38
Denied	364	36	11
% of Loans	73.0%	5.0%	2.3%

When looking at income differences between Whites and Blacks there is a considerable lag in median household income between the two races. However it is not enough to explain the fact that only 5% of home loans come from Blacks in the County.

6.0 Advertising

6.1 Statute and Regulatory Language

In simple terms, discriminatory real estate advertising is prohibited by the Fair Housing Amendments Act (FHAA) of 1988 (42 U.S.C. 3604). This means the law applies to classified advertising, display advertising, inserts or any other type of real estate advertising that a newspaper or magazine may publish. It also applies to any type of advertising or written material that a real estate business may distribute or use, whether it is brochures, direct mailings, radio or television advertising, multiple listing service (MLS), posters, billboards, application forms or other documents, signs or videos.

In Section 804, the FHAA specifically states that:

“It shall be unlawful to make, print, or publish, or cause to be made, printed or published any notice, statement, or advertisement, with respect to the sale or rental of a dwelling that indicates any preference, limitation, or discrimination based on race, color, religion, sex, handicap, familial status, or national origin, or an intention to make any such preference, limitation, or discrimination.”

Because housing is an integral part to the successful community care for many people with mental disabilities, discrimination has been a major barrier of access to adequate housing.



In an effort to eliminate such discrimination and to support the right of people with a disability to live in the community of their choice, Congress included in the FHAA prohibitions against discrimination of persons with a mental disability in the provision of housing. In addition, it also prohibited discrimination of families with children. The provisions of the act also establish stronger administrative enforcement mechanisms and provide for stiffer penalties to expand coverage to include these specific classes in addition to those protected classes initially covered.

Advertising guidelines have been the subject of great debate since they were enacted in 1988. In order to clarify the confusion over terms and phrases that were considered a violation of the regulations, the US Department of Housing and Urban Development (HUD) agency issued further guidelines that provide a more reasonable review method in order to determine what constitutes discriminatory advertising.

6.4 Analysis of Advertising

The consultants looked for subtly discouraging language throughout the classified advertising, both in the paper and on Graigs List, etc.. Almost a half of the rental advertisements contained the phrase “no pets.” While “pets” per se are not covered by the Fair Housing Act, people with disabilities who need animals for support or assistance are likely not to contact housing providers who run such advertisements, even though the Fair Housing Act would allow those individuals in most cases to request a reasonable accommodation allowing them to have an animal despite a “no-pets” policy. Not all people with disabilities are aware of their rights to such an accommodation, and other people would prefer not to go through the difficulty of requesting one. Specifically, one advertisement stated ‘Absolutely no pets.’ Clearly, this restriction would rule out the presence of a service animal or an emotional support animal.

In past fair housing program years the consultants conducted a limited testing program of rental advertising that had “No Pets” in their ads. This testing was based on the prospective renter calling and inquiring about the “No Pet” policy by indicating that they were disabled and would need a Reasonable Accommodation regarding the pet policy. Almost 90% of those called would deny the Accommodation and maintain that the “No Pet” policy would stand no matter the disability. In clear violation of local, state and federal fair housing regulations.

7.0 - Zoning

Another aspect of discrimination necessary to discuss is barriers to fair housing resulting from zoning and subdivision regulations. Whether certain zoning and subdivision



controls are, in fact, discriminatory is controversial. However, several cities have been successfully sued by the federal government over the manner in which they were zoned.

7.1 Introduction

Not In My Backyard, Removing Barriers to Affordable Housing, was published in July 1991, by the Advisory Commission on Regulatory Barriers and Affordable Housing. In the forward, then HUD Secretary Jack Kemp wrote that "the Commission's disturbing conclusion is that exclusionary, discriminatory and unnecessary regulations constitute formidable barriers to affordable housing . . . "

Not In My Backyard . . . , cites excessive subdivision standards, fees, slow and burdensome permitting processes, applying building codes for new construction to rehabilitation, and NIMBY as among the most serious barriers.

The Advisory Commission concluded that states should take action to alleviate barriers to affordable housing. "States are in a unique position, for both constitutional and practical reasons, to deal with regulatory barriers to affordable housing. Constitutionally, all authority exercised by units of local government over land use and development derives wholly from the State . . . which is therefore uniquely situated to undertake reform of the collage of local regulations, as well as the State requirements that overlay them."

Four key areas were reviewed as part of the analysis. They were selected because of the possible adverse effects they could have on families and persons with disabilities.

1. Definitions used for "families," "group homes," "dwelling unit"
2. Regulations (if any) regarding "group homes"
3. Ability for "group homes" or other similar type housing to be developed.
4. Unreasonable restrictions, costs on developing multi-family housing units, such as lot size requirements, impact fees, setbacks.

Discriminatory zoning regarding group homes is probably one of the most litigated areas of fair housing regulations. Across the country advocacy groups for the disabled are filing complaints over restrictive zoning codes and in most cases these groups are prevailing.

Among the most important protections provided by the Fair Housing Amendments Act of 1988 are those afforded to families with children and the handicapped, or persons with disabilities. Notably, the developing crisis in affordable housing that the nation experienced in the eighties had a particularly devastating effect upon these protected



classes. Accordingly, Congress imposed specific safeguards against policies, customs and practices that, by their impact or design, discriminate against these groups.

In addition to interdicting private acts of discrimination, entitlement grantees should be especially vigilant regarding the impact of zoning regulations and building codes upon these two vulnerable populations. For instance, provisions in zoning regulations that define which living arrangements constitute a “family” can unduly restrict where group homes for the disabled can be placed. Similarly, restrictions governing the placement of multifamily complexes can unduly burden families with children by isolating them in densely populated, high traffic commercial areas. In summary, entitlement grantees should regularly review their zoning and building regulations, especially if such a review has not been conducted since the enactment of the Fair Housing Amendments Act of 1988.

7.2 Local Review of Zoning Codes

Since the passage of the Fair Housing Amendments Act in 1988 local public officials have expressed concern regarding the impact of the Act on local zoning and land use decisions. Since its passage there have been numerous court actions, administrative hearings and other adverse review of local ordinances. Many of these actions have centered around the definition of “family’s” and relationship of the ordinances to group homes or congregate living. Local officials are faced with an emerging consensus that community living as opposed to institutional living can benefit a large number of people with disabilities. Also found in the mix of these decisions and actions are restrictive definitions from “family” found in many ordinances.

As part of this analysis we looked at the zoning ordinance and resolutions in the City. The City’s zoning was found to have no adverse language or policies. As far as can be determined, Sandusky conducts their housing programs in an affirmative manner and without restrictive policies that would adversely affect members of the protected classes. In our review of the local zoning ordinance we found no language, definitions or other issues that we found to be overtly discriminatory in their intent or nature.

8.0 - Insurance Redlining

Insurance redlining occurs when insurance agents, offices and/or companies decide that certain areas of the community will not be offered home owner’s insurance, that the number of policies offered will be limited to a certain number or that they will not offer all the various home owner’s policies that they have.



For example, an insurance company or agent may refuse to underwrite a home owner replacement cost policy. This policy allows the home owner to rebuild his home as close to its original condition as possible and is a very popular form of insurance. In many minority and low income neighborhoods, insurance companies would refuse to offer this policy and would offer only the very basic of policies or no policies at all.

Racial minorities, low-income neighborhoods and neighborhoods containing large numbers of minorities are discriminated against in the provision of property insurance. If intentional racial discrimination is not widespread, traditional industry practices still adversely affect racial minorities and minority neighborhoods. The lack of insurance coverage caused by not offering policies in these neighborhoods or limiting such policies to the most basic coverage is an impediment to the redevelopment of urban communities.

Insurance companies establish a base rate (sometimes referred to as an “overall” rate) that is determined primarily by the specific location of the housing. Each company first determines a base rate based on the premiums they receive from a given geographic area, the losses incurred within that area, and the expenses of that company to write and administer the policies. Thus, the amount of coverage in the past within a particular area of the County directly impacts present rates offered by a given insurance company. If the company has historically under served a geographic section of the community, the current base rate will reflect the historic lack of premiums within that area. This can have the effect of perpetuating the lack of insurance services resulting from historic redlining or other causes.

Some companies have two rating tiers and others may have as many as four tiers in the area of home owner insurance. Tiers are much less common in the area of tenant home owner insurance, though a few companies may have more than one tier. The determination of what rating tier to apply is more a function of the person or persons applying for the insurance as opposed to the location of the property. Tier structures can then cause changes to the base rate depending on a number of factors.

The most significant factors used to establish the rate tiers are:

- ✓ Loss history of the individual
- ✓ Age of the property, though the specific age used is variable (i.e., some companies may have higher rates or not write insurance for houses older than twenty-five years while other companies will use forty years or older).
- ✓ Value of the dwelling
- ✓ Other lines of coverage, such as auto insurance, with the same company
- ✓ Years insured with the company



The use of age and the value of the dwelling as determinants of rates can have a significant impact on the older sections of Sandusky where the housing stock is older and typically of less value. These two factors alone can increase the rates for insurance being offered and even discourage companies from offering a full range of products in these geographic areas. The demographic analysis of the community discussed in Section 3.2.1 clearly shows that a disproportionate number of Blacks and Hispanics live in these older sections of Sandusky. Even though the use of age and value of the dwellings are neutral policies, they still may well impact the composition of the community in a negative manner.

8.1 Credit-Scoring

Credit scoring is a criterion for determining rate tiers, although it may play a role as an underwriting tool. By its use as an underwriting tool, a credit score can become a barrier to individuals and families who are trying to purchase a home or where a landlord requires tenant(s) to carry rental insurance as part of the lease. Since the use of credit scoring as a criterion to qualify for insurance is new, there have been no studies measuring its impact as yet. Based on the 2000 Census data, the correlation between minorities and poverty was very high (.726). It is reasonable to assume that the use of credit scoring as a property insurance underwriting tool, will result in a discriminatory impact on Blacks and other minorities who are disproportionately represented in low income categories.

8.2 Local Review

While the scope of this analysis does not allow for insurance redlining investigations and testing, we were able to look at one key element of insurance redlining. A critical factor in the marketing of insurance is the location of offices/agents. A majority of the property insurance policies sold by most agents are to insure properties in neighborhoods in which the agent is located. Studies have shown that the distribution of agent locations is clearly related to the racial composition of neighborhoods.

We found that insurance offices tend to follow population growth and development growth. As new housing and new shopping is developed in communities insurance providers place offices close to this growth. We found no indication that neighborhoods or communities were being selective in the office locations to deny access to possible homeowners. Based on addresses and locations it would appear that access to insurance is available to all resident of the City in a reasonable way.



9.0 Conclusions, Impediments and Recommendations

Federal Law mandates that every federal entitlement community be responsible for affirmatively furthering fair housing. Federal regulations go further than merely making this a requirement. Local communities must *certify* that they will affirmatively further fair housing and assume the responsibility of fair housing planning by conducting an analysis of impediments to fair housing. This report is a search for evidence that a policy, practice, standard or method of administration, although neutral on its face, operates to deny equal housing choice to an individual because of their race, color, religion, sex, national origin, religion, familial status or disability. The document produced as a result of this research is generally called the Analysis of Impediments to Fair Housing Choice (AI).

The AI has reviewed a variety of questions that may affect the fair housing "health" of the community. It reviewed the practices and provisions of lending institutions, local housing-related codes and regulations, advertising for housing, past and present air housing activities, the real estate and rental industry, and affordable housing programs and issues. It also reviewed the concerns of affordable housing and how housing policies can affect the low and moderate income population. While some of these concerns, on their face, do not constitute fair housing related concerns, they can have an impact on equal choice in housing.

The availability of housing and housing programs is important to a community. It does little good to provide home ownership programs if lenders that administer the programs require different terms and conditions of certain races, religions or sex. A rental rehabilitation program can offer the opportunity for individuals to live in safe and sanitary housing, but when a landlord/owner discriminates in his choice of tenants because of family status, race, disability, etc. the program does the community little good. Similarly, if a community is building affordable multi-family housing and fails to assure the accessibility of units for disabled persons, the project fails before it is begun.

Some may argue that fair housing should only be concerned with the issues of equal choice or that fair housing should have nothing to do with the development of housing programs. Another argument is that Fair Housing Law protects persons based on race, religion, color, sex, national origin, familial status and disability and that other issues such as the source of income, marital status and age have nothing to do with fair housing. However, this is not true. Recent decisions by the courts are indicating that any policy or activity however neutral on its face that denies housing is of concern to the court and should be of concern to the community. The impact of fair housing considerations on the development of accessible multifamily housing is another example



illustrating this point.

Challenges are also being made in Sandusky regarding age, marital status, sexual preference and the provision of County services to low-moderate income (LMI) housing developments. Challenges reflect how fair housing laws and regulations respond and ultimately adapt to the housing concerns of the community. Current challenges should be used as an indicator by the community to adjust established policy to meet the housing needs of the protected as well as the unprotected classes.

Below is a summary of the key findings and identified impediments and related recommendations. The consultant will both identify resources to implement these recommendations and suggest a feasible timetable.

9.1 Fair Housing Enforcement

Recommendation:

1. In addition to the provision of education and resources on fair housing issues and public forums for citizens to report housing discrimination, maintain and enhance the City's fair housing capabilities to help the City respond to and follow up on matters relating to illegal discrimination, including housing discrimination.
2. Conduct fair housing testing to ensure that fair housing laws are enforced and meritorious cases brought forward. This is especially needed in the ongoing effort to encourage landlords to be more responsive to reasonable accommodations as they relate to the disabled community.
3. Increase efforts to collaborate between the local government, Ohio Civil Rights Commission, non-profit housing agencies, and U.S. Department of Housing and Urban Development in order to gather and share information, in a consistent and comparable manner, related to fair housing issues.

9.2 Accessibility

The more critical issue today is the need to increase the amount of affordable and accessible housing stock in the community and to ensure that persons with physical or mental disabilities can fully enjoy their housing. It was mentioned earlier in this report that there is a continuing need for more affordable housing for the disabled, including disabled veterans.



Recommendation:

1. Educate developers, non-profit organizations and architects about ways they can enhance the accessibility of existing units and increase the availability of accessible units;
2. Systematically inform housing providers and residents about their right to reasonable accommodations and modifications under fair housing law through the development and distribution of materials.
3. Evaluate contact points where citizens with accessible housing and other housing concerns contact the various City agencies and develop a strategy to improve efficiency and effectiveness (quality) of the City's response.

9.3 Lending

Without access to financial services that charge reasonable fees, low and moderate income people will remain trapped in an endless cycle of debt. This debt weakens families which in turn weakens Sandusky neighborhoods. Bad debt prevents people from buying homes and being eligible for many jobs. The low and moderate income markets demonstrate a strong demand that is inadequately being served by traditional banking services.

Equal access to financial services is a difficult issue requiring the cooperation of all facets of the housing market. There is a significant need to work closely together, identifying predatory practices, and finding ways to eliminate them from the community.

Recommendation:

1. Continue an emphasis on community education, particularly aimed at those populations targeted by predatory lenders.
2. Include information and education regarding predatory practices for those participating in City programs which provide "equity, which may later become the subject of equity stripping predatory practices.
3. Include consideration of fringe financial industry practices in the areas of check cashing and "payday loans," and explore the feasibility of making available alternative, legitimate services to address identified gaps.
5. Ensure all City grantee organizations serving persons who experience predatory



lending practices receive training to identify and properly advise and /or refer persons to appropriate resources in the community.

Lenders are clearly not reaching the minority communities in Sandusky and, when they do receive applications from non-White individuals and families, those applications are more likely to be denied. Thus, the dream of home ownership is still eluding many qualified members of the minority communities. This is a critical issue for the Sandusky, since the purchase of a home is the primary way individuals and families build wealth. Without that asset base in the geographic areas with high percentages of minorities, there will be limited community reinvestment, including businesses like grocery stores and other retail services.

Recommendation:

1. Promote quality home ownership education in both English and Spanish, especially aimed at the low and moderate income markets.
2. Encourage the lending industry to conduct an ongoing campaign to increase minority loan applications for the purchase of homes including the provision of education to real estate professionals on the use of community lending products for LMI clientele.
3. Conduct and publicly publish annual reviews of lending institutions using HMDA data to determine if applications from non-White individuals and families are rising and if denials rates are comparable to White borrowers in the same income levels. Identify and develop a means of collecting equivalent data on non-regulated lenders that do not report HMDA data and include them in the annual review.

9.5 Affordable Rental Housing

One of the most significant impediments identified in this review was the lack of affordable housing. The increase in demand for affordable rental housing is becoming a major problem. As noted above in the NIMBY section, negative attitudes and community hostility towards affordable housing are a critical barrier to increasing affordable rental stock. Finding ways to address these attitudes is covered in the earlier recommendations.

In addition, local communities must work with HUD, the state, and the public housing authorities to increase efforts to provide housing to low-income residents.



Recommendation:

1. Develop resources to facilitate implementation of the mobility counseling provisions of the plan.
2. Assist in the recruitment of landlords, developers and others to increase de-concentration by increasing those housing providers willing to participate in the Housing Choice Voucher program of MHA.
3. Develop and encourage proactive education efforts to facilitate implementation of the program by avoiding/averting/ minimizing these problems. Recruiting the involvement of non-profit, faith-based, grassroots and other existing community organizations in this effort is recommended for efficiency and effectiveness.
4. Continue to support the cooperative efforts of the the City Code Enforcement Office which works closely the Fair Housing Program, to correct code and health violations and thus increase the supply of safe affordable rental housing.
5. Examine the composition of local boards, commissions, and advisory bodies to determine representation of individuals in protected classes in decision making positions.



SOURCES

The following sources were used in completing this report:

1. The 2000, 2010, 2020, 2021 US Census Data
2. American Fact Finder - US Census Bureau
3. Out of Reach a report of housing affordability - National Low Income Housing Coalition, 2023
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5. OSU Online - Community GIS Information - Sandusky
6. Ohio Data Users Center - County Profiles
7. Realtor.com - Find a Neighborhood
8. FFIEC - HMDA Data Reports 2022
9. White and Yellow Pages - 2023
10. SBC.Com White & Yellow Pages -Sandusky Locations
11. National Association of Home Builders- www.nagb.org
12. Fannie Mae Foundation Research and Sources
13. U.S. Census Bureau County Business Patterns
14. City Data Dot Com
15. Graig's List For Rent/For Sale