

The State of Fair Housing in Northeast Ohio: April 2006

JEFFREY D. DILLMAN
CARRIE BENDER PLEASANTS
AMY B. ROSKILLY
HOPE K. FARMBY



HOUSING RESEARCH & ADVOCACY CENTER
3631 PERKINS AVENUE, #3A-2
CLEVELAND, OHIO 44114
(216) 361-9240 (PHONE)
(216) 426-1290 (FAX)
www.thehousingcenter.org

About the Authors

JEFFREY D. DILLMAN, is the Executive Director of the Housing Research & Advocacy Center (the Housing Center). He received his J.D. from Boalt Hall School of Law, University of California, Berkeley, and has practiced civil rights, consumer, and immigration law for over 15 years.

CARRIE BENDER PLEASANTS is the Director of Research & Investigations at the Housing Center. She received her M.A. in Geography, with an emphasis on Urban Geography, from Kent State University and has conducted a number of research projects at the Housing Center related to lending discrimination and impediments to fair housing.

AMY B. ROSKILLY is the Housing Center's Education and Outreach Coordinator. She received her B.S. in Communications from Ohio University and is currently finishing a M.A. in Environmental Studies at Cleveland State University. Amy has over 10 years experience in educational programming, event planning and public relations for non-profit and corporate firms.

HOPE K. FARMBY is the Housing Center's Fair Housing Specialist. She received her J.D. from John Marshall School of Law where she participated in the Fair Housing Clinic and Predatory Lending Clinic.

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About the Housing Research & Advocacy Center

The Housing Research & Advocacy Center (the "Housing Center") is a 501(c)(3) non-profit organization whose mission is to eliminate housing discrimination and assure choice in Northeast Ohio by providing those at risk with effective information, intervention and advocacy. The Housing Center was founded in 1983 as the Metropolitan Strategy Group and changed its name in 2003 to better reflect the organization's mission.

The Housing Center works to achieve its mission through work in three primary areas: research and mapping, education and outreach, and enforcement of fair housing laws through testing and litigation. In addition to addressing traditional issues of housing discrimination and segregation, the Housing Center also provides research, education, and analysis of subprime and predatory lending practices and trends in the region.

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I. Executive Summary

Housing discrimination has been a persistent problem in our region and country. The level of discrimination we face today, as well as the segregated housing patterns of our region, are a result of decades of official policies of governments at all levels, of private businesses and associations, and of individual actions by homeowners, rental agents, and others. Without the actions of all of these individuals and entities, not only would we face less segregation and discrimination as a society, but there would be less economic stratification, as housing patterns affect not only where one lives but, in many respects, one's life chances through access to quality schools, transportation, jobs, and a healthy environment.

This report represents the first-ever comprehensive survey of fair housing in Northeast Ohio.¹ In writing this report, we hope to accomplish several tasks: to raise awareness of housing discrimination and segregation in the region, to encourage political leaders and policy makers to move beyond rhetoric to make eliminating housing discrimination a priority, and to provide a baseline for future research on this topic.

Thirty-eight years after the passage of the federal Fair Housing Act – which prohibits discrimination based on race, color, religion, sex, national origin, familial status, and handicap – housing discrimination on many of these grounds is still widespread in the region.²

In the last five years for which complete data is available (2000-2004), an average of 111.8 complaints for housing discrimination were filed in the region annually with the Ohio Civil Rights Commission (OCRC) and the U.S. Department of Housing and Urban Development (HUD), up from an average of 79.6 for the period 1995-1999. The increase in cases filed is due almost entirely to a doubling in the number of cases brought for discrimination based on disability and familial status (families with children), while the number of cases brought based on race remained nearly constant. With this increase in disability and familial status cases, the most common bases of discrimination alleged in complaints filed in 2000-2004 were race (32.4% of complaints filed), disability (32.0%) and familial status (23.0%).

While the increase in cases filed is significant, it is clear that it represents only a small fraction of the total number of instances of housing discrimination in the region. By examining moving patterns of different racial and ethnic groups and comparing this to discrimination rates found in a recent national study, the Housing Center estimates that there are annually at least 33,690 instances of housing discrimination in the region against African Americans, Hispanics/Latinos, and Asian Americans and Pacific Islanders.

¹For purposes of this report, we have examined a six-county region made up of Ashtabula, Cuyahoga, Geauga, Lake, Lorain, and Medina Counties.

²As is discussed in Section III, below, the provisions regarding familial status and handicap were added in the 1989 amendments to the Fair Housing Act. Ohio law also prohibits discrimination based on ancestry.

Housing segregation has improved marginally for African Americans in the past 25 years, with the region moving from the third-most segregated area in the country to the sixth-most segregated. For Hispanics/Latinos, the region has gone from the seventh-most segregated in 1980 to the eleventh-most segregated in 2000, although this “improvement” has not been accompanied by any decrease in segregation for Hispanics/Latinos but rather has been based on other regions becoming more segregated.

While the level of segregation and number of instances of discrimination in the region are high, some local communities have taken steps to address housing discrimination by passing local fair housing legislation. A total of 32 local governments in Cuyahoga County have passed fair housing ordinances, compared to 2 in Ashtabula County, 3 in Lake County, 7 in Lorain County, and 2 in Medina County. There are no local fair housing ordinances in Geauga County.

Although many of these statutes merely recodify federal and state law without offering additional protection to individuals, a number of the statutes also prohibit discrimination on other bases, thus providing protection to additional classes of people. The grounds protected by local ordinances (and the number of jurisdictions providing such protection) include age (16 ordinances), creed (15), marital status (14), sexual orientation (7), ethnic group (2), disabled veteran status (2), and Vietnam veteran status (2).

For our region to successfully confront and eliminate housing discrimination will require concrete action on behalf of the victims of housing discrimination and creative solutions that move beyond current laws. Among the Housing Center’s recommendations are:

- enacting stronger fair housing laws that prohibit discrimination based on additional grounds (such as source of income to prohibit discrimination against individuals who rely on housing subsidies);
- implementing comprehensive education efforts for housing providers, renters and homeowners to ensure that individuals are aware of fair housing laws and the means available to enforce them;
- vigorously enforcing fair housing laws at all levels, including the use of systemic testing for discrimination to both punish individuals who violate fair housing laws and deter future violations of the act;
- developing creative solutions to housing discrimination and racial and economic segregation (including exploring ideas such as tax credits for individuals making diversifying moves).

II. Demographics of the Region

Fair housing laws provide protection from discrimination to all members of our society, not only members of racial or ethnic minorities. For example, the prohibitions on race discrimination prohibit discrimination not only against African Americans or other racial minorities but against *any* person on account of his or her race. Likewise, the provisions on religious discrimination prohibit not only discrimination against members of minority religions but adherents to any religion (as well as those who are not religious).

While every individual in our society therefore is provided with protection by fair housing laws, the history of discrimination in our country have demonstrated that it is members of minority groups – whether racial, religious, ethnic, national origin, or other – that face discrimination most often and with the most severe consequences. Thus, the chances of a white individual facing racial discrimination are much lower than the chances of an African American (or Hispanic or Arab American) facing such discrimination. As such, we provide below an overview of the demographics of the region, with a focus on its racial and ethnic make-up, as well as the characteristics of the population protected by federal and state fair housing laws.

Region Covered

This report covers the state of fair housing in Northeast Ohio. For purposes of this report, the area consists of the counties of Ashtabula, Cuyahoga, Geauga, Lake, Lorain, and Medina. This area was chosen because up until 2000, it represented the Metropolitan Statistical Area (MSA) used by the U.S. Census Bureau to describe the region.³

Population of the Region

From 1970 to 2004, the population of the area covered by this report has decreased by 7.4%, from 2,419,274 to 2,240,225, at a time when the population of the country as a whole increased 40.5%.⁴ Changes in county-level populations have varied from an increase of 99.6% for Medina County to a 21.5% decrease in Cuyahoga County.⁵

³In 1990, this area comprised the Cleveland-Elyria-Lorain Metropolitan Statistical Area (MSA). In 2000, the Census Bureau modified the MSA to remove Ashtabula County and renamed the region as the Cleveland-Elyria-Mentor MSA. We have included all six counties in this report to allow a comparison over time of the demographics, as well as the fair housing complaints, in the region.

⁴See U.S. Census Table 1. Urban and Rural Population 1900 to 1990; GCT-PH1. U.S. Census Bureau, 2004 American Community Survey.

⁵For data sources for all tables and charts, see Appendix D.

Table 1: Population of Region by County

| | 1970 | 1980 | 1990 | 2000 | 2004 | % Change from 1970 to 2004 |
|-----------|-----------|-----------|-----------|-----------|-----------|----------------------------|
| Ashtabula | 98,237 | 104,215 | 99,821 | 102,728 | 103,152 | 5.0 |
| Cuyahoga | 1,721,300 | 1,498,400 | 1,412,140 | 1,393,978 | 1,351,009 | -21.5 |
| Geauga | 62,977 | 74,474 | 81,129 | 90,895 | 94,602 | 50.2 |
| Lake | 197,200 | 212,801 | 215,499 | 227,511 | 232,061 | 17.7 |
| Lorain | 256,843 | 274,909 | 271,126 | 284,664 | 294,324 | 14.6 |
| Medina | 82,717 | 113,150 | 122,354 | 151,095 | 165,077 | 99.6 |
| Total | 2,419,274 | 2,277,949 | 2,202,069 | 2,250,871 | 2,240,225 | -7.4 |

Source: U.S. Census

Overall, the racial makeup of the six-county region has become more diverse over the past 35 years. During this time period, the percentage of population that is white has decreased from 85.0% in 1970 to 76.9% white in 2000.⁶ The percentage of African Americans has increased in this period from 14.6% to 18.5%, while the number of Asians and Pacific Islanders has doubled from 0.7% in 1980 to 1.4% in 2000.

Table 2: Race of Population in Region⁷

| | 1970 | | 1980 | | 1990 | | 2000 | |
|-----------------------------------|-----------|---------|-----------|---------|-----------|---------|-----------|---------|
| | Number | Percent | Number | Percent | Number | Percent | Number | Percent |
| White | 2,056,236 | 85.0 | 1,869,554 | 82.1 | 1,772,782 | 80.5 | 1,731,562 | 76.9 |
| African American or Black | 352,757 | 14.6 | 368,519 | 16.2 | 379,987 | 17.3 | 417,044 | 18.5 |
| American Indian and Alaska Native | NR | NR | 2,625 | 0.1 | 3,972 | 0.2 | 4,121 | 0.2 |
| Asian and Pacific Islander | NR | NR | 14,460 | 0.6 | 22,357 | 1.0 | 31,209 | 1.4 |
| Two or more races | NR | NR | NR | NR | NR | NR | 34,932 | 1.6 |

Source: U.S. Census

According to the Census Bureau, the Hispanic/Latino population of the region increased from 1.8% in 1980 to 3.3% in 2000, with Lorain County (6.9%) and Cuyahoga County (3.4%) having the highest percentages.

⁶This report analyzes the racial make-up of each of the counties through 2000, the last year racial data is available from the Census Bureau for all of the counties studied.

⁷Notes: NR = not reported. In 1970, the only racial categories listed for total county populations were "White" or "Negro." In 1980 and 1990, the Census Bureau added "American Indian, Eskimo and Aleut" and "Asian and Pacific Islander." In 2000, the Census Bureau reported "Asian" separate from "Native Hawaiian and other Pacific Islander." For this table, these two categories were combined to allow for easier comparison to 1980 and 1990, when the Census Bureau reported them in one category. This chart does not include individuals who reported "Other races" in any of the years. Racial data for each of the six counties in this report is provided in Appendix A.

Table 3: Hispanic or Latino/a Population⁸

| | 1980 | | 1990 | | 2000 | |
|-----------|--------|---------|--------|---------|--------|---------|
| | Number | Percent | Number | Percent | Number | Percent |
| Ashtabula | 1,119 | 1.1 | 1,538 | 1.5 | 2,292 | 2.2 |
| Cuyahoga | 24,028 | 1.6 | 31,447 | 2.2 | 47,078 | 3.4 |
| Geauga | 305 | 0.4 | 294 | 0.4 | 538 | 0.6 |
| Lake | 1,098 | 0.5 | 1,469 | 0.7 | 3,879 | 1.7 |
| Lorain | 13,124 | 4.8 | 15,261 | 5.6 | 19,676 | 6.9 |
| Medina | 489 | 0.4 | 711 | 0.6 | 1,399 | 0.9 |
| Total | 40,163 | 1.8 | 50,720 | 2.3 | 74,862 | 3.3 |

Source: U.S. Census

The percentage of foreign born population in the region (who would be protected under fair housing laws based on the prohibition of discrimination based on national origin) is 5.1% for the region, with a low of 1.6% for Ashtabula County to a high of 6.4% in Cuyahoga County.

Table 4: Percent of Population that is Foreign Born in 2000

| | Native Born | | Foreign Born | |
|-----------|-------------|---------|--------------|---------|
| | Number | Percent | Number | Percent |
| Ashtabula | 101,109 | 98.4 | 1,619 | 1.6 |
| Cuyahoga | 1,305,217 | 93.6 | 88,761 | 6.4 |
| Geauga | 88,342 | 97.2 | 2,553 | 2.8 |
| Lake | 217,765 | 95.7 | 9,746 | 4.3 |
| Lorain | 277,268 | 97.4 | 7,396 | 2.6 |
| Medina | 146,545 | 97.0 | 4,550 | 3.0 |
| Total | 2,136,246 | 94.9 | 114,625 | 5.1 |

Source: U.S. Census

In response to widespread discrimination against families with children, Congress amended the Fair Housing Act in 1989 to prohibit discrimination based on familial status. In 2000, 33.4% of households in the region contained an individual under 18 years of age, ranging from a low of 31.7% in Cuyahoga County to a high of 39.9% in Medina County.

Table 5: Households with Individuals Under 18 in 2000

| | Number | Percent |
|-----------|---------|---------|
| Ashtabula | 14,014 | 35.6 |
| Cuyahoga | 180,906 | 31.7 |
| Geauga | 12,339 | 39.0 |
| Lake | 29,800 | 33.2 |
| Lorain | 39,218 | 37.1 |
| Medina | 21,771 | 39.9 |
| Total | 298,048 | 33.4 |

Source: U.S. Census

⁸ According to the Census Bureau, "Hispanic" and "Latino" are not racial designations, and individuals may be of any race. The Census Bureau did not report the number of "Hispanic" or "Latino" individuals on a county-wide basis in 1970.

Also in 1989, Congress added provisions to the Fair Housing Act prohibiting discrimination based on handicap. In 2000, 17.3% of the population between the ages of 21 and 64 were disabled, with a low of 11.8% in Lorain County and a high of 20.0% in Ashtabula County. For individuals 65 years of age and older, 40.9% of the population in the six counties was disabled, with a low of 36.4% in Medina County and a high of 43.6% in Ashtabula County. Among individuals aged five to 20 years, 7.9% were disabled, with a low of 5.2% in Geauga County and a high of 8.4% in Cuyahoga County.

Table 6: Population With a Disability in 2000

| | 5 to 20 years | | 21 to 64 years | | 65 years and over | |
|-----------|---------------|---------|----------------|---------|-------------------|---------|
| | Number | Percent | Number | Percent | Number | Percent |
| Ashtabula | 1,958 | 8.3 | 11,349 | 20.0 | 6,156 | 43.6 |
| Cuyahoga | 25,534 | 8.4 | 143,094 | 18.4 | 86,202 | 41.9 |
| Gauga | 1,178 | 5.2 | 6,446 | 12.6 | 3,802 | 36.8 |
| Lake | 3,219 | 6.6 | 18,759 | 14.2 | 11,621 | 38.0 |
| Lorain | 5,229 | 7.9 | 26,451 | 11.8 | 13,544 | 39.8 |
| Medina | 2,195 | 6.1 | 11,889 | 13.4 | 5,451 | 36.4 |
| Total | 39,313 | 7.9 | 217,988 | 17.3 | 126,776 | 40.9 |

Source: U.S. Census

In addition to prohibiting discrimination based on handicap, the 1989 amendments to the Fair Housing Act also required that certain new multifamily housing be constructed with certain accessible features to ensure that disabled individuals were able to have greater housing options. While single-family housing is not required to meet these accessibility standards, newer single-family homes tend to be more accessible to individuals with mobility impairments and certain other physical disabilities compared to older homes. Thus, the age of housing in a region is often an indication of the amount of housing that is potentially more accessible to individuals with certain physical disabilities. In the region, 5.0% of the housing stock overall was built from 1995 to 2000, ranging from a low of 2.8% in Cuyahoga County to a high of 14.9% in Medina County. Additionally, 35.9% of the housing in the region was built prior to 1950, with a low of 17.5% for Medina County to a high of 44.3% for Cuyahoga County.

Table 7: Year Housing Built in the Region

| Year Built | Ashtabula | | Cuyahoga | | Geauga | | Lake | | Lorain | | Medina | | Total | |
|-----------------|-----------|-------|----------|-------|--------|-------|--------|-------|---------|-------|--------|-------|---------|-------|
| | # | % | # | % | # | % | # | % | # | % | # | % | # | % |
| 1999- Mar 2000 | 554 | 1.3 | 4,501 | 0.7 | 685 | 2.1 | 1,180 | 1.3 | 2,181 | 2.0 | 1,974 | 3.5 | 11,075 | 1.2 |
| 1995-1998 | 2,202 | 5.0 | 13,226 | 2.1 | 2,695 | 8.2 | 5,159 | 5.5 | 6,138 | 5.5 | 6,454 | 11.4 | 35,874 | 3.8 |
| 1990-1994 | 1,855 | 4.2 | 17,510 | 2.8 | 2,859 | 8.7 | 6,080 | 6.5 | 6,344 | 5.7 | 5,964 | 10.5 | 40,612 | 4.3 |
| 1980-1989 | 3,068 | 7.0 | 33,571 | 5.4 | 4,246 | 12.9 | 10,429 | 11.2 | 8,137 | 7.3 | 6,761 | 11.9 | 66,212 | 6.9 |
| 1970-1979 | 6,780 | 15.5 | 64,007 | 10.4 | 6,294 | 19.2 | 17,579 | 18.8 | 20,796 | 18.7 | 13,465 | 23.7 | 128,921 | 13.5 |
| 1960-1969 | 4,592 | 10.5 | 94,706 | 15.4 | 4,441 | 13.5 | 15,854 | 17.0 | 18,414 | 16.5 | 5,938 | 10.5 | 143,945 | 15.1 |
| 1950-1959 | 6,248 | 14.3 | 128,497 | 20.8 | 4,924 | 15.0 | 19,925 | 21.3 | 19,892 | 17.9 | 6,333 | 11.2 | 185,819 | 19.5 |
| 1940-1949 | 4,546 | 10.4 | 83,139 | 13.5 | 1,667 | 5.1 | 6,696 | 7.2 | 9,453 | 8.5 | 2,145 | 3.8 | 107,646 | 11.3 |
| 1939 or earlier | 13,947 | 31.8 | 177,746 | 28.8 | 4,994 | 15.2 | 10,585 | 11.3 | 20,013 | 18.0 | 7,759 | 13.7 | 235,044 | 24.6 |
| Total | 43,792 | 100.0 | 616,903 | 100.0 | 32,805 | 100.0 | 93,487 | 100.0 | 111,368 | 100.0 | 56,793 | 100.0 | 955,148 | 100.0 |

Source: U.S. Census

Although fair housing laws prohibit discrimination in sales as well as purchases of housing,⁹ more housing discrimination cases are brought for discrimination in the rental, rather than sales, context.¹⁰ In the six-county region, 68.3% of all housing units were owner-occupied in 2000, leaving 31.7% as rental properties. In 2000, Cuyahoga County had the lowest percentage of owner-occupied housing, at 63.2%, while the highest percentage was 87.2% in Geauga County.

Table 8: Percentage of Owner-Occupied Housing in Region

| | 1980 | 1990 | 2000 |
|-----------|------|------|------|
| Ashtabula | 75.6 | 80.7 | 74.1 |
| Cuyahoga | 61.2 | 62.0 | 63.2 |
| Geauga | 85.0 | 85.7 | 87.2 |
| Lake | 76.7 | 75.8 | 77.5 |
| Lorain | 73.2 | 71.9 | 74.2 |
| Medina | 79.9 | 79.3 | 81.3 |
| Total | 66.0 | 66.8 | 68.3 |

Source: U.S. Census

III. Fair Housing Laws in Northeast Ohio

The purpose of fair housing laws is to counteract the effects of housing discrimination in our society. Laws prohibiting discrimination in housing are found at the federal, state, and, in some jurisdictions, local level.¹¹ Which law or laws apply in a given situation depend on where the

⁹For a full description of the provisions of the federal, state, and local fair housing statutes, see Section III, below.

¹⁰See National Fair Housing Alliance, "2005 Fair Housing Trends Report," April 5, 2005, pp. 9-10.

¹¹In addition to federal, state, and local fair housing laws discussed below in this report, there are a number of other federal statutes that provide protection to individuals from discrimination in housing and mortgage lending. These statutes include: the Civil Rights Act of 1866 (42 U.S.C. §1981 and §1982), the Americans with Disabilities

property in question is located and/or where the alleged discriminatory act took place. Generally, Ohio law is broader than federal law, providing more protection to potential victims of discrimination. Some local laws provide even further protections within their communities than does Ohio law, while in other communities with local legislation, Ohio law remains the broadest in terms of protection. Below is a brief summary of the federal, state, and local fair housing laws in Northeast Ohio.

A. Federal Law

The federal Fair Housing Act (42 U.S.C. §3601, *et seq.*) was passed by Congress in 1968 to help remedy the history of housing discrimination that existed (and continues to exist) throughout the country.

The Fair Housing Act makes it unlawful, on account of one of the classes protected by the statute, to

- refuse to sell or rent a dwelling;¹²
- refuse to negotiate for the sale or rental of a dwelling;
- otherwise make unavailable or deny a dwelling;
- discriminate in the terms, conditions, or privileges of the sale or rental of a dwelling;
- discriminate in the provision of services of facilities in connection with a dwelling;
- make discriminatory advertising or statements with respect to the sale or rental of a dwelling;
- indicate any discriminatory preference or limitation with respect to the sale or rental of a dwelling;
- misrepresent the availability of a dwelling;
- engage in “blockbusting;”¹³
- discriminate in the financing of residential real estate related transactions;
- discriminate in the provision of brokerage services;
- coerce, intimidate, threaten, or interfere with any person in the exercise of his or her rights under the Act or retaliate against an individual for exercising his or her rights under the Act.

Act (ADA) (42 U.S.C. §1201, *et seq.*), Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. §794), Title VI of the Civil Rights Act of 1964 (42 U.S.C. §2000d, *et seq.*), the Equal Credit Opportunity Act (15 U.S.C. §1691, *et seq.*), and the Housing and Community Development Act (42 U.S.C. §1437, *et seq.*).

¹²In certain circumstances, the owner of a single-family home may be exempt from coverage under the federal Fair Housing Act. In addition, under the “Mrs. Murphy” exemption, an owner-occupied complex of four or fewer units may be exempt from coverage under the statute. These exemptions do not exist under Ohio’s fair housing law.

¹³“Blockbusting” refers to encouraging homeowners to sell their homes quickly (and often at below market rates) by creating a fear that members of a minority group are moving into the neighborhood.

The federal Fair Housing Act prohibits discrimination based on seven grounds: race, color, religion, national origin, sex, familial status, and handicap.¹⁴ “Familial status” is defined under the Fair Housing Act to mean one or more individuals under 18 years of age living with a parent, legal custodian, or the designee of such a parent or legal custodian. In addition, the provision protects individuals in the process of securing legal custody of a minor and pregnant women. 42 U.S.C. §3602(k). A “handicap” is defined under the Fair Housing Act to include a physical or mental impairment which substantially limits one or more major life activity, a record of having such an impairment, or being regarded as having such an impairment. 42 U.S.C. §3602(h).¹⁵

The Fair Housing Act can be enforced by the U.S. Department of Justice, the U.S. Department of Housing and Urban Development (HUD), and through private lawsuits brought by individuals or organizations that have experienced discrimination.

B. Ohio Law

In addition to being covered by the federal Fair Housing Act, all property in Ohio is also covered by Ohio’s state law governing fair housing (Ohio Revised Code 4112.02(H)). The Ohio statute is broader than the federal Fair Housing Act in several important respects. First, in addition to prohibiting discrimination based on all of the classes protected by federal law (race, color, religion, national origin, sex, handicap and familial status), Ohio law also prohibits discrimination based on “ancestry,” a somewhat different and potentially broader category than “national origin.” Second, while federal law provides several provisions that exempt certain property from coverage, Ohio’s statute does not include these exemptions, making Ohio’s fair housing law applicable to almost all housing in the state.¹⁶

C. Local Law

In addition to the federal and state statutes, which apply throughout the State of Ohio, numerous counties, cities, and villages in northeast Ohio have passed ordinances covering fair housing.

Locally, 32 governments in Cuyahoga County have fair housing ordinances, compared to 2 in Ashtabula County, 3 in Lake County, 7 in Lorain County, and 2 in Medina County. (There are

¹⁴In passing the Act in 1968, Congress prohibited discrimination based on race, color, religion, and national origin. (Civil Rights Act of 1968, Title VIII, Pub. L. No. 90-284.) Discrimination based on sex (including sexual harassment) was prohibited by a 1974 amendment. (Housing and Community Development Act of 1974, Pub. L. No. 93-383, §808.) In 1988, Congress amended the Act to include familial status and handicap as protected classes. (Fair Housing Amendments Act of 1988, Pub. L. No. 100-430.)

¹⁵Current, illegal use or addiction to a controlled substance does not qualify as a handicap. 42 U.S.C. §3602(h)(3).

¹⁶The “Mrs. Murphy” exemption (for an owner-occupied complex of four or fewer units) and the exemption for the sale and rental of an owner’s single-family home are not included in Ohio’s fair housing law. Under Ohio and federal law, certain noncommercial property owned by religious organizations and private clubs may be exempt from fair housing laws in certain circumstances. In addition, senior housing is exempt from the familial status provisions under both statutes.

no local fair housing ordinances in Geauga County.)¹⁷

While some of these ordinances provide the same protection as federal or state law, others are broader, offering protection from discrimination to additional classes of individuals.¹⁸ The additional classes protected by cities in the region (and the number of local jurisdictions protecting them) include age (16), creed (15), marital status (14), sexual orientation (7), ethnic group (2), disabled veteran status (2), and Vietnam veteran status (2).

Table 9 provides a comparison of the local fair housing laws passed by villages, cities, and counties in the six-county region covered by this report, including the classes protected from discrimination by each ordinance. In addition, the table indicates which jurisdictions have a complaint procedure and/or a local fair housing board to investigate complaints.

¹⁷For purposes of this report, we consider local fair housing ordinances to be laws that prohibit discrimination in housing transactions. In addition to the ordinances listed here, a number of jurisdictions have ordinances criminalizing intimidation in housing. These jurisdictions include: Avon, Avon Lake, Brooklyn Heights, Cuyahoga Heights, Lyndhurst, Mayfield Heights, Middleburg Heights, Pepper Pike, Solon, and Wadsworth. Because these ordinances are more akin to intimidation statutes, we do not include them in Table 9 or this analysis of local fair housing laws. The city of Amherst also has an ordinance stating that it is the “policy” of the city to oppose housing discrimination. This ordinance was not included as it does not contain any prohibitions on discrimination for the public at large.

¹⁸Some of these statutes are narrower than federal or state law. In those cases, the broader protections offered by state and federal law, as those statutes apply statewide and nationwide, respectively.

Table 9: Local Fair Housing Laws in the Region

| | Race | Color | Religion | National Origin | Sex/Gender | Familial Status | Handicap/Disability | Ancestry | Age | Creed | Marital Status | Sexual Orientation | Ethnic Group | Vietnam Vet Status | Disabled Vet Status | Citation | Fair Housing Board | Fair Housing Complaint Process |
|-------------------------|------|-------|----------|-----------------|------------|-----------------|---------------------|----------|-----|-------|----------------|--------------------|--------------|--------------------|---------------------|--------------------|--------------------|--------------------------------|
| Ashtabula County | | | | | | | | | | | | | | | | | | |
| Ashtabula City | x | x | x | x | x | x | x | | x | x | x | | | | | 515.01 | Yes | Yes |
| Geneva | x | x | x | x | x | | x | | x | x | x | | | | | 628.01 | No | Yes |
| Cuyahoga County | | | | | | | | | | | | | | | | | | |
| Bay Village | x | x | x | x | x | x | x | x | | | | | | | | 515.01 | Yes | Yes |
| Bedford | x | x | x | x | x | x | x | | x | x | x | | | | | 727.01 | No | No |
| Bedford Heights | x | x | x | x | x | x | x | | x | x | x | | | | | 749.01 | No | Yes |
| Berea | x | x | x | x | x | x | x | x | | | | | | | | 951.01 | No | Yes |
| Brooklyn | x | x | x | x | x | x | x | x | | | | | | | | 745.01 | Yes | Yes |
| Cleveland | x | x | x | x | x | x | x | x | x | | x | x | x | x | x | 665.01 | Yes | Yes |
| Cleveland Heights | x | x | x | x | x | x | x | | | | x | | | | | 749.01 | Yes | Yes |
| East Cleveland | x | x | x | x | x | x | x | x | x | | x | x | x | x | x | 557.01 | Yes | Yes |
| Fairview Park | x | x | x | x | x | x | x | | x | | | | | | | 563.01 | No | Yes |
| Gates Mills | x | x | x | x | x | x | x | x | | | | | | | | 773.01 | No | No |
| Glenwillow | x | x | x | x | x | x | x | x | | | | | | | | 519.01 | No | Yes |
| Highland Hills | x | x | x | x | x | x | x | x | | | | | | | | 715.01 | Yes | Yes |
| Lakewood | x | x | x | x | x | x | x | x | | | | x | | | | 516.01 | No | Yes |
| Linndale | x | x | x | x | x | x | x | | x | x | x | | | | | 515.99 | No | Yes |
| Mayfield Village | x | x | x | x | x | x | x | x | | | | | | | | 743.01 | Yes | Yes |
| Newburgh Heights | x | x | x | x | x | | x | x | | | | | | | | 515.01 | Yes | Yes |
| North Olmsted | x | x | x | x | x | x | x | x | x | | | x | | | | 1901.01 | Yes | Yes |
| North Randall | x | x | x | x | x | x | x | x | | | | | | | | 628.01 | Yes | Yes |
| North Royalton | x | x | x | x | x | x | x | x | | | | | | | | 628.01 | Yes | Yes |
| Oakwood | x | x | x | x | x | x | x | x | | | | | | | | 1353.01 | Yes | Yes |
| Olmsted Falls | x | x | x | x | x | x | x | x | | | | | | | | 623.01 | No | No |
| Parma | x | x | x | x | x | x | x | x | | | | | | | | 1719.01; 622.01 | Yes | Yes |
| Parma Heights | x | x | x | x | x | x | x | x | | | | | | | | 622.01 | Yes | Yes |
| Richmond Heights | x | | x | x | x | | | | | x | | | | | | 749.01 | No | No |
| Rocky River | x | x | x | x | x | x | x | | x | | | | | | | 538.01 | No | No |
| Shaker Heights | x | x | x | x | x | x | x | x | | | | x | | | | 515.01 | Yes | Yes |
| South Euclid | x | x | x | x | x | x | x | x | | | | | | | | 1408.01 | Yes | Yes |
| Strongsville | x | x | x | x | x | x | x | x | | | | | | | | 1484.01 | No | Yes |
| University Heights | x | x | x | x | x | x | x | x | x | | | | | | | 820.01 | Yes | Yes |
| Warrensville Heights | x | x | x | x | x | x | x | | | x | | | | | | 113.01 | No | Yes |
| Westlake | x | x | x | x | x | x | x | x | | | | | | | | 515.01 | No | Yes |
| Woodmere | x | x | x | x | x | | x | | x | x | x | | | | | 553.01 | No | Yes |

(continued)

| | Race | Color | Religion | National Origin | Sex/Gender | Familial Status | Handicap/Disability | Ancestry | Age | Creed | Marital Status | Sexual Orientation | Ethnic Group | Vietnam Vet Status | Disabled Vet Status | Citation | Fair Housing Board | Fair Housing Complaint Process |
|-----------------------|------|-------|----------|-----------------|------------|-----------------|---------------------|----------|-----|-------|----------------|--------------------|--------------|--------------------|---------------------|-------------------|--------------------|--------------------------------|
| Lake County | | | | | | | | | | | | | | | | | | |
| Mentor | x | x | x | x | x | | x | | | x | x | | | | | Ord. No. 78-0-153 | Yes | Yes |
| Mentor on the Lake | x | x | x | x | x | | x | | | x | x | | | | | 628.01 | Yes | Yes |
| Painesville | x | x | x | x | x | | | | | | | | | | | 1377.01 | Yes | Yes |
| Lorain County | | | | | | | | | | | | | | | | | | |
| Elyria | x | x | x | x | x | x | x | | | x | | | | | | 725.01 | Yes | Yes |
| Grafton Village | x | x | x | x | x | | x | | x | x | x | | | | | 628.01 | Yes | Yes |
| Lorain City | x | x | x | x | x | x | x | | | | | | | | | 136.01 | Yes | Yes |
| Lorain County | x | x | x | x | x | x | x | | | | | | | | | Res. No. 00-802 | Yes | Yes |
| North Ridgeville | x | x | x | x | x | x | x | | x | x | x | | | | | 628.01 | Yes | Yes |
| Oberlin | x | x | x | x | x | x | x | x | | | | x | | | | 1185.01 | No | Yes |
| Vermillion | x | x | x | x | | | | x | | | | | | | | 628.01 | Yes | Yes |
| Medina County | | | | | | | | | | | | | | | | | | |
| Chippewa Lake Village | x | x | x | x | x | | x | | x | x | x | | | | | Ord. No. 610-05 | Yes | Yes |
| Medina County | x | x | x | x | x | | x | | x | x | x | | | | | Res. No. 81-509 | Yes | Yes |

Source: HRAC Analysis of Local Ordinances

IV. Fair Housing Complaints in Northeast Ohio

A. Federal and State Complaint Process

Under the federal Fair Housing Act, individuals who have suffered discrimination may choose to file an administrative complaint before the U.S. Department of Housing and Urban Development (HUD), a lawsuit in court, or both. Because Ohio's fair housing law has been designated substantially similar to the federal statute, virtually all housing discrimination complaints filed with HUD are referred to the Ohio Civil Rights Commission (OCRC) for investigation and potential resolution.¹⁹

¹⁹According to the agreement between HUD and the OCRC, with several small exceptions, fair housing complaints from Ohio that are filed with HUD are referred to the OCRC for investigation and resolution. In 2005, less than one percent of cases were investigated by HUD. (Email communication with Carolyn Murphy, Director of Columbus Fair Housing Center, U.S. Department of Housing and Urban Development, March 10, 2006.)

Ohio's fair housing law also allows individuals to pursue remedies administratively before the OCRC or in court. In addition to investigating cases referred by HUD, the OCRC accepts complaints of housing discrimination filed with the agency directly.²⁰

Once the OCRC receives a complaint (or "charge"), the agency assigns it to an investigator. The investigator researches the complaint, speaking with all of the parties and potential witnesses and reviewing documentation, if available, to determine if there is probable cause of discrimination. Prior to making the decision, the OCRC offers the parties the opportunity to voluntarily mediate their dispute. If both parties agree, a mediator meets with the parties and attempts to find a mutually satisfactory resolution. If a settlement is not reached, the case continues to be investigated.²¹

After the investigator has reached a recommendation, the case is submitted for supervisory approval and ultimately to the Commissioners, who must approve the report before it becomes a final OCRC finding. Based on its review of the report and recommendation of the OCRC's field staff, the Commission makes a finding of "probable cause" or "no probable cause" of discrimination.

If the OCRC finds probable cause of discrimination, the parties are offered a final chance to resolve their differences through a conciliation process. In the event that the dispute cannot be resolved, the case is referred to the Civil Rights Section of the Ohio Attorney General's Office to bring a civil action before an administrative hearing officer or, if the parties request, in state court.

B. Number of Complaints Filed in Region

The Housing Center has collected and analyzed data on all fair housing complaints filed in the six-county region with HUD and/or the Ohio Civil Rights Commission from 1990 through 2004.²² This data reveals that over the 15-year period:

- an average of 111.7 complaints were filed each year in the region;
- cases filed alleging race discrimination accounted for 41.0% of the total, compared to

²⁰The procedures of the OCRC are set forth in ORC 4112.03-4112.06 and in the Ohio Administrative Code 4112-3-01 through 4112-3-17.

²¹The Commission has the authority to demand access to records, premises, documents, evidence or possible sources of evidence, and to record testimony or statements from individuals. Further, the agency has the right to issue subpoenas, interrogatories, cease and desist orders, hold public hearings, and collect monetary benefits.

²²The OCRC does not report data on cases that remain under investigation and/or have not had a final decision reached by the Commission. As such, data from 2005 were not analyzed in this report as there are many cases filed in that year that remain open at this time. While there are possibly some cases still open from 2004 which would not be reflected in the data presented here, the number is likely relatively small.

- 22.1% for handicap, and 17.2% for familial status;
- complaints based on sex/gender accounted for only 8.2% of the total, national origin cases made up 5.4%, and complaints based on religion made up 1.9%;
- nearly three-quarters of the complaints (73.5%) were filed in Cuyahoga County.

The Housing Center also examined how complaints have changed over time in the region, to determine whether certain types of discrimination were being alleged more (or less) over time.²³ Because of the possibility that any particular year could have an unusually large or small number of complaints filed in a given category, we examined the number of complaints filed in two five-year periods (from 1995-1999 and from 2000-2004) to ascertain whether the types of complaints being filed recently differed from those being filed earlier. This analysis revealed that while the absolute number of complaints based on race, religion, and sex/gender remained relatively constant in each of these two periods, the number of complaints based on familial status and handicap each more than doubled,²⁴ while the number of complaints based on national origin decreased by almost one-third.

As a percentage of the total complaints filed, these figures reveal the following:

- an average of 111.8 complaints have been filed in the region annually in the past five years, up from an annual average of 79.6 for the period 1995-1999;
- in the last five years, complaints based on disability made up 32.0% of the complaints, up from 20.6% in the previous five-year period;
- in the last five years, complaints based on familial status increased to 23.0% of the total, up from 10.1% in the preceding five-year period;
- complaints based on race made up 32.4% of the total from 2000-2004, down from 45.2% in the period 1995-1999;
- from 1995-1999 to 2000-2004, complaints based on sex/gender have decreased from 7.8% of the total to 5.7% of the total; complaints based on national origin have dropped from 7.3% of the total to 3.8% of the total, and complaints based on religion have decreased from 2.8% of the total to 2.3% of the total.

These breakdowns of the types of cases being filed locally in the last five years are similar to those reported nationally. In fiscal year 2004, HUD reported that 38.2% of complaints nationally based on race, and disability accounted for 37.9%. The National Fair Housing Alliance reported for 2004 that 31% of cases filed nationwide were based on disability discrimination, 26% were

²³While an increase in cases filed could result from an increase in discrimination, it also could be due to other factors, such as increased monitoring of discrimination, increased knowledge of the law, or other factors. Likewise, a decrease in the number of cases filed does not necessarily represent a decrease in discrimination on that basis.

²⁴The number of complaints based on familial status increased from 40 to 129 between these two time periods, more than tripling. However, a review of the data indicates that in 2000, an unusually high number of familial status cases were filed (63), of which 54 were against the same respondent. Even removing these 54 cases from the 2000-2004 totals, the number of cases based on familial status almost doubled between these two periods.

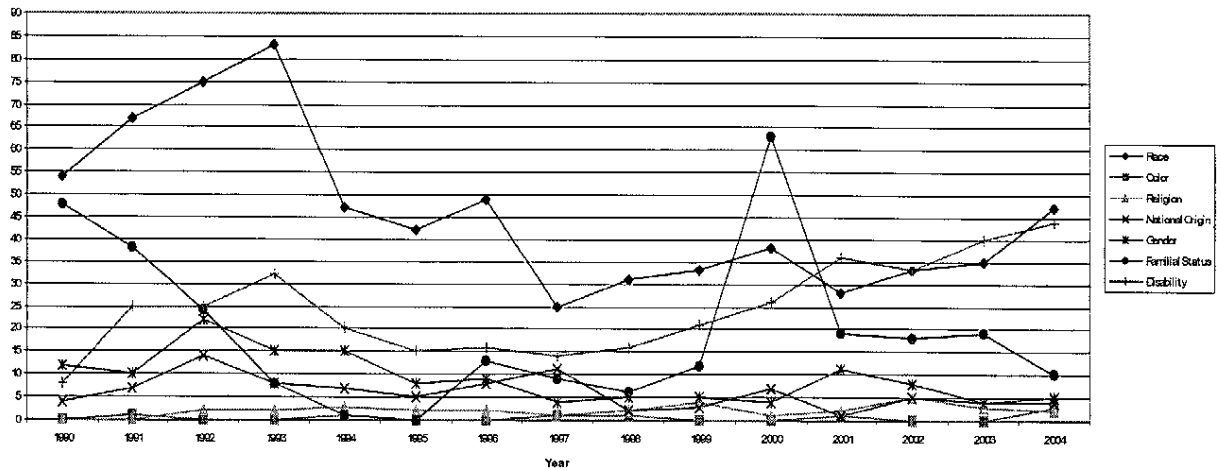
based on racial discrimination, and 13% were based on familial status discrimination.²⁵

Table 10: Number and Basis of Complaints filed with HUD and OCRC in the Region²⁶

| | Race | Color | Religion | National Origin | Sex/ Gender | Familial Status | Handicap/ Disability | Other | Total |
|-------|------|-------|----------|-----------------|-------------|-----------------|----------------------|-------|-------|
| 1990 | 54 | 0 | 0 | 4 | 12 | 48 | 8 | 0 | 126 |
| 1991 | 67 | 1 | 0 | 7 | 10 | 38 | 25 | 0 | 148 |
| 1992 | 75 | 0 | 2 | 14 | 22 | 24 | 25 | 1 | 163 |
| 1993 | 83 | 0 | 2 | 8 | 15 | 8 | 32 | 12 | 160 |
| 1994 | 47 | 1 | 3 | 7 | 15 | 1 | 20 | 27 | 121 |
| 1995 | 42 | 0 | 2 | 5 | 8 | 0 | 15 | 12 | 84 |
| 1996 | 49 | 0 | 2 | 8 | 9 | 13 | 16 | 9 | 106 |
| 1997 | 25 | 1 | 1 | 11 | 4 | 9 | 14 | 0 | 65 |
| 1998 | 31 | 1 | 2 | 2 | 5 | 6 | 16 | 2 | 65 |
| 1999 | 33 | 0 | 4 | 3 | 5 | 12 | 21 | 0 | 78 |
| 2000 | 38 | 0 | 1 | 7 | 4 | 63 | 26 | 0 | 139 |
| 2001 | 28 | 1 | 2 | 1 | 11 | 19 | 36 | 0 | 98 |
| 2002 | 33 | 0 | 5 | 5 | 8 | 18 | 33 | 0 | 102 |
| 2003 | 35 | 0 | 3 | 4 | 4 | 19 | 40 | 0 | 105 |
| 2004 | 47 | 3 | 2 | 4 | 5 | 10 | 44 | 0 | 115 |
| Total | 687 | 8 | 31 | 90 | 137 | 288 | 371 | 63 | 1675 |

Source: HRAC analysis of HUD and OCRC data

Chart 1: Basis of Complaints Filed with HUD and OCRC in the Region



²⁵See HUD 2005 State of Fair Housing Report, available at www.hud.gov/offices/fheo/enforcement/flmreport05.pdf; NFHA, "2005 Fair Housing Trends Report."

²⁶County-level data is presented in Appendix B, below.

The Housing Center also undertook an analysis of the number of complaints filed per 100,000 residents each year in the region.²⁷ This analysis revealed an average of 5.0 complaints filed per year for each 100,000 people in the six-county region. Cuyahoga County had the highest incidence of housing complaints based on population size in the region (6.2 per 100,000), while Geauga County had the lowest incidence (1.8 per 100,000). In terms of complaints based on race, the overall incidence was 2.1 complaints per 100,000, with a high of 2.7 per 100,000 in Cuyahoga County and a low of 0.7 per 100,000 in Geauga County.

The different rates of cases filed in different counties is likely due to a number of factors in addition to differential rates of discrimination, including the racial and ethnic make-up of the region, the relative amount of rental housing, housing mobility rates, and the presence or absence of fair housing organizations in the counties who might educate and assist potential victims of discrimination and conduct systemic testing.

C. Incidence of Housing Discrimination in the Region

Although there were 115 complaints of housing discrimination filed in 2004 in the region, the actual incidence of housing discrimination is undoubtedly much higher. To date, there has been no systematic study of the rate or total number of instances of housing discrimination in the region.²⁸

In 2003, the Urban Institute prepared a report for HUD which found that nationwide, housing discrimination occurred in 20.3% of the cases in which African Americans attempted to rent an apartment and 16.8% of the cases in which African Americans attempted to purchase a home. For Hispanics/Latinos, the report found discrimination 23.4% of the time in rentals and 18.3% of the time in home sales.²⁹

Although the report found some variability across metropolitan areas, the overall levels of discrimination in the localities studied were not significantly different from the national averages, and the report concluded that “discrimination against African American and Hispanic homeseekers remains a problem in large metropolitan areas nationwide – that no region of the

²⁷To calculate the number of complaints per 100,000 people, the Housing Center divided the number of complaints per year for each jurisdiction by the mean of the total population in 1990 and 2004 and then multiplied this amount by 100,000.

²⁸The Fair Housing Resource Center, in Painesville, Ohio, recently issued a report that found housing discrimination against people with disabilities in 38% of cases in Lake County. FHRC, “Is Our Nation Moving Towards a Dual Society: One Able and One Disabled - Separate and Unequal? Discrimination in Lake County Housing Market, 2004-2005 Report.”

²⁹Urban Institute, “Discrimination in Metropolitan Housing Markets: Phase I - Supplement” (February 2003), pp. 3-1 and 3-4, available at www.hudclips.org.

country or group of metropolitan areas is exempt.”³⁰

A later Urban Institute report prepared for HUD examined discrimination against Asians and Pacific Islanders, finding discrimination in 21.5% of the cases involving rentals and 20.4% of the cases for home sales.³¹

Using the data collected for the Urban Institute/HUD report, the National Fair Housing Alliance commissioned several reports on the total number of instances of housing discrimination each year. These reports found that nationwide, there was a minimum of 3.7 million instances of housing discrimination annually. In its report, NFHA noted that this was a low estimate, as it was based on the Urban Institute’s data, which covered only discrimination based on race (against African Americans, Asians and Pacific Islanders, and Native Americans) and against Hispanics/Latinos and which did not capture all types of discrimination against these groups.³²

To estimate the incidence of housing discrimination in the region, the Housing Center has used the methodology developed for the NFHA reports by comparing the rate of discrimination found by the Urban Institute in its reports with mobility rates for renters and homebuyers in the Northeast Ohio region in 2004.

Using the Urban Institute data, which the Housing Center believes likely understate the rates of discrimination, the Housing Center estimates that there are annually at least 33,690 instances of housing discrimination based on race and national origin in the six-county region.³³

V. Racial and Ethnic Segregation in Northeast Ohio

One of the most common measures of the segregation of a region is the dissimilarity index. This index measures the percentage of a minority population who would have to move from one neighborhood to another neighborhood in order to achieve complete integration. Using the dissimilarity index, a score of 0.0 would represent a completely integrated distribution of individuals, while a score of 1.0 would be a situation in which both groups (e.g. races) were completely segregated and in which every member of the minority group (e.g. African

³⁰Urban Institute, “Discrimination in Metropolitan Housing Markets: Phase I” (November 2002), p. 8-6, available at www.hudclips.org.

³¹Urban Institute, “Discrimination in Metropolitan Housing Markets: Phase 2 - Asians and Pacific Islanders” (March 2003), p. iv, available at www.hudclips.org.

³²See National Fair Housing Alliance, “2004 Fair Housing Trends Report,” April 7, 2004, pp. 1-5. Among the limitations with the HUD data, NFHA noted that the research excluded many smaller owner-occupied housing units which comprise a significant portion of the rental market, did not account for discrimination that occurred at the preliminary telephone contact stage, and did not account for discrimination that occurred after an applicant submitted an application. *Id.* at 5.

³³The Housing Center’s methodology in deriving this estimate is found in Appendix C.

Americans) would have to move in order to achieve complete integration.

Using the dissimilarity index, the Cleveland region has become somewhat less racially segregated for African-Americans in the past 25 years, moving from the third most-segregated large metropolitan area in the country for African Americans in 1980 to the sixth most-segregated in 2000. During this period, the MSA's ranking on the dissimilarity index has improved from a score of 0.854 in 1980 to 0.824 in 1980 to 0.768 in 2000.

Table 11: Residential Segregation for African Americans in Large Metropolitan Areas Ranked by Dissimilarity Index

| | 1980 | 1990 | 2000 |
|------|--------------------------------|--------------------------------|--------------------------------|
| Rank | MSA/PMSA Name | MSA/PMSA Name | MSA/PMSA Name |
| 1 | Chicago | Detroit | Detroit |
| 2 | Detroit | Chicago | Milwaukee-Waukesha |
| 3 | Cleveland-Lorain-Elyria | Milwaukee-Waukesha | New York |
| 4 | Milwaukee-Waukesha | Newark | Newark |
| 5 | Fort Lauderdale | Cleveland-Lorain-Elyria | Chicago |
| 6 | Newark | New York | Cleveland-Lorain-Elyria |
| 7 | St. Louis | Buffalo-Niagara Falls | Buffalo-Niagara Falls |
| 8 | New York | St. Louis | Cincinnati |
| 9 | Los Angeles-Long Beach | Bergen-Passaic | St. Louis |
| 10 | Bergen-Passaic | Philadelphia | Nassau-Suffolk |

Source: U.S. Census

While these measures show a slight improvement for the region, the continued out-migration of population from the region, and from Cuyahoga County in particular, presents risks for potential re-segregation, or at least for a slowing of the integration in the region. As many researchers have noted, the areas of the country which have shown the most gains in terms of residential integration have been those in the south and west which have experienced the largest population growth.³⁴ In fact, of the 10 most segregated large metropolitan areas in 2000, all are in the Northeast or Midwest, while Fort Lauderdale (which ranked fifth most-segregated in 1980) and Los Angeles (which ranked ninth in 1980) have dropped to twenty-ninth and nineteenth, respectively.

Segregated housing patterns affect the ability of African American families to build wealth through home ownership. A recent report sponsored by the Brookings Institute concluded that a "segregation tax" is imposed on African American homeowners due to the decreased value of property in predominantly minority neighborhoods.³⁵ According to this report, the Cleveland area suffers from a "tax" of 24%, meaning that for each dollar of income, African American homeowners have 24% less in home values compared to whites with the same income. While

³⁴See, e.g., Robert L. Smith and David Davis, "Migration Patterns Hold Back Cleveland," *Plain Dealer*, 12/30/02.

³⁵Rusk, David, "The 'Segregation Tax:' The Cost of Racial Segregation to Black Homeowners" (Washington, D.C.: Brookings Institution, October 2001).

this “tax” is not formally assessed or collected by any governmental body, the lower amount of wealth that African Americans are able to accumulate has a real effect on their wealth and the amount of money they can pass on to their children.

With regard to segregation for Hispanics/Latinos, the situation as a whole is more complicated. Overall, Hispanics/Latinos in the region are less segregated than African Americans. Moreover, the Cleveland region has gone from being the seventh most-segregated large metropolitan area for Hispanics/Latinos in 1980 to the eleventh most-segregated in 2000. However, this “improvement” has come not from any decrease in segregation of Hispanics/Latinos in the region; the dissimilarity index has actually *increased* slightly from 1980, when it was 0.575, to 2000, when it stood at 0.577. Thus, the “improvement” has come about because other regions have become more segregated, overtaking the Cleveland region with regarding to segregation of Hispanics/Latinos.

Table 12: Residential Segregation for Hispanics/Latinos in Large Metropolitan Areas Ranked by Dissimilarity Index

| | 1980 | 1990 | 2000 |
|------|---------------------------------|--------------------------------|--------------------------------|
| Rank | MSA/PMSA Name | MSA/PMSA Name | MSA/PMSA Name |
| 1 | Newark | Newark | Providence-Fall River-Warwick |
| 2 | Hartford | Hartford | New York |
| 3 | New York | New York | Newark |
| 4 | Chicago | Philadelphia | Hartford |
| 5 | Philadelphia | Chicago | Los Angeles-Long Beach |
| 6 | Bergen-Passaic | Providence-Fall River-Warwick | Chicago |
| 7 | Cleveland-Lorain-Elyria | Los Angeles-Long Beach | Philadelphia |
| 8 | San Antonio | Bergen-Passaic | Milwaukee-Waukesha |
| 9 | Los Angeles-Long Beach | Cleveland-Lorain-Elyria | Boston |
| 10 | Boston | Milwaukee-Waukesha | Bergen-Passaic |
| 11 | Milwaukee-Waukesha | Boston | Cleveland-Lorain-Elyria |
| 12 | Miami | San Antonio | Houston |
| 13 | Phoenix-Mesa | Miami | Orange County |
| 14 | Houston | Orange County | Dallas |
| 15 | Tampa-St. Petersburg-Clearwater | Dallas | San Francisco |

Source: U.S. Census

VI. Recommendations and Conclusions

As we noted at the outset of this report, housing discrimination affects not only whether or not an individual will be able to rent a given apartment or purchase a particular house. It also significantly affects people’s lives in many other areas, including what type of neighborhood they can live in, the schools their children attend, their access to transportation and jobs, and the amount of wealth they are able to build due to home equity.

While this report outlines many areas in which our region has significant work to accomplish, we also believe that there are concrete steps that government officials and others can take that will have a positive impact on the state of fair housing in our region.

To help accomplish this goal, the Housing Research & Advocacy Center recommends the following:

- 1) **Fair housing laws must be strengthened.** Fair housing laws should protect a broader class of individuals than are currently protected by federal and state law. The Housing Center believes that local governments should follow the lead of some of the cities identified in this report and prohibit discrimination based on their sexual orientation, marital status, and age.

In addition, the Housing Center urges local governments to prohibit discrimination based on source of income, to ensure that individuals who use housing subsidies (such as “Section 8 vouchers”) are not discriminated against on that basis. In its research, the Housing Center did not find any local jurisdiction which prohibited discrimination based on source of income, although such discrimination is prohibited nationally in a number of states and cities. Adding protection based on source of income is one step that local and regional governments can take to help ensure that economic segregation does not replace the racial discrimination that we currently suffer.

- 2) **Increased resources must be devoted to educating the public and housing providers regarding fair housing laws.** While most individuals likely know that discrimination based on race or religion in housing is illegal, some housing providers are still unaware that discrimination based on familial status and handicap/disability are prohibited. Additionally, many victims of housing discrimination are unaware of their rights under federal, state, and especially local laws, and of the procedures they may use to vindicate those rights. As such, increased resources must be devoted to educating “both sides” about fair housing laws and procedures, as well as where individuals may turn for help if they have questions or believe their rights have been violated.

- 3) **Fair housing laws must be enforced more vigorously.** While having strong laws is important, without vigorous enforcement housing discrimination will continue. Housing discrimination is not always easy to detect. While a generation ago it might not have been uncommon for housing providers to openly state that they would not rent to African Americans, for example, now discrimination often occurs in more subtle forms, such as refusing to return telephone calls from individuals with African American dialects or speech patterns.

It is the responsibility of federal, state, and local governments to work to ensure that all citizens have a fair opportunity to rent and purchase housing in cities and neighborhoods they desire. A vigorous enforcement strategy should include an adequate testing program to ensure that discrimination is both deterred and detected. In cases where housing discrimination is found, governments must take strong action to ensure that those found guilty are punished, both to as a means of compensating the victims as well as deterring future violations.

In addition, even though the Fair Housing Act's accessibility provisions for multi-family housing have been in place for over 15 years, new housing is still being built in violation of these provisions. Governments at all levels must ensure that these requirements are complied with to ensure that the region's housing stock becomes more accessible.

4) **Government incentives should be provided to help achieve housing integration.**

More than 35 years after the passage of the Fair Housing Act, we continue to live in a region that is highly segregated, particularly for African Americans. At the current rate of "progress," it will take decades for the region to become integrated. Governments should develop creative mechanisms to help address housing discrimination, possibly including the use of financial incentives for individuals making diversifying moves. For example, tax incentives, such as a state tax credit, could be offered to individuals who make a racially diversifying move.

In addition, local land use codes and regulations must be examined and revised both to ensure both that individuals and groups are not discriminated against and that such policies do not exacerbate regional sprawl, further weakening our region and worsening economic segregation.

While these recommendations are broad and will require investment of time and resources, the Housing Center believes that they will greatly strengthen our region and provide benefits in many areas, making our region not only more just and equitable but stronger financially.

Appendix A

Population Data by County

Table 13: Race of Population: Ashtabula County

| | 1970 | | 1980 | | 1990 | | 2000 | |
|-----------------------------------|--------|---------|---------|---------|--------|---------|--------|---------|
| | Number | Percent | Number | Percent | Number | Percent | Number | Percent |
| White | 95,372 | 97.0 | 100,129 | 96.1 | 95,465 | 95.6 | 96,635 | 94.1 |
| African American or Black | 2,652 | 2.7 | 3,060 | 2.9 | 3,138 | 3.1 | 3,247 | 3.2 |
| American Indian and Alaska Native | NR | NR | 160 | 0.2 | 196 | 0.2 | 195 | 0.2 |
| Asian and Pacific Islander | NR | NR | 317 | 0.3 | 350 | 0.4 | 371 | 0.4 |
| Two or more | NR | NR | NR | NR | NR | NR | 1,402 | 1.4 |

Source: U.S. Census

Table 14: Race of Population: Cuyahoga County

| | 1970 | | 1980 | | 1990 | | 2000 | |
|-----------------------------------|-----------|---------|-----------|---------|-----------|---------|---------|---------|
| | Number | Percent | Number | Percent | Number | Percent | Number | Percent |
| White | 1,383,749 | 80.4 | 1,129,966 | 75.4 | 1,025,756 | 72.6 | 938,863 | 67.4 |
| African American or Black | 328,419 | 19.1 | 341,003 | 22.8 | 350,185 | 24.8 | 382,634 | 27.4 |
| American Indian and Alaska Native | NR | NR | 1,644 | 0.1 | 2,533 | 0.2 | 2,529 | 0.2 |
| Asian and Pacific Islander | NR | NR | 11,470 | 0.8 | 18,085 | 1.3 | 25,583 | 1.8 |
| Two or more races | NR | NR | NR | NR | NR | NR | 23,407 | 1.7 |

Source: U.S. Census

Table 15: Race of Population: Geauga County

| | 1970 | | 1980 | | 1990 | | 2000 | |
|-----------------------------------|--------|---------|--------|---------|--------|---------|--------|---------|
| | Number | Percent | Number | Percent | Number | Percent | Number | Percent |
| White | 61,951 | 98.4 | 73,133 | 98.2 | 79,629 | 98.2 | 88,553 | 97.4 |
| African American or Black | 873 | 1.4 | 990 | 1.3 | 1,056 | 1.3 | 1,110 | 1.2 |
| American Indian and Alaska Native | NR | NR | 34 | 0.0 | 83 | 0.1 | 69 | 0.1 |
| Asian and Pacific Islander | NR | NR | 239 | 0.3 | 312 | 0.4 | 395 | 0.4 |
| Two or more races | NR | NR | NR | NR | NR | NR | 645 | 0.7 |

Source: U.S. Census

Table 16: Race of Population: Lake County

| | 1970 | | 1980 | | 1990 | | 2000 | |
|-----------------------------------|---------|---------|---------|---------|---------|---------|---------|---------|
| | Number | Percent | Number | Percent | Number | Percent | Number | Percent |
| White | 193,993 | 98.4 | 207,995 | 97.7 | 209,879 | 97.4 | 217,041 | 95.4 |
| African American or Black | 2,634 | 1.3 | 2,944 | 1.4 | 3,528 | 1.6 | 4,527 | 2.0 |
| American Indian and Alaska Native | NR | NR | 202 | 0.1 | 250 | 0.1 | 251 | 0.1 |
| Asian and Pacific Islander | NR | NR | 1,152 | 0.5 | 1,447 | 0.7 | 2,089 | 0.9 |
| Two or more races | NR | NR | NR | NR | NR | NR | 2,098 | 0.9 |

Source: U.S. Census

Table 17: Race of Population: Lorain County

| | 1970 | | 1980 | | 1990 | | 2000 | |
|-----------------------------------|---------|---------|---------|---------|---------|---------|---------|---------|
| | Number | Percent | Number | Percent | Number | Percent | Number | Percent |
| White | 239,252 | 93.2 | 246,516 | 89.7 | 241,549 | 89.1 | 243,514 | 85.5 |
| African American or Black | 17,491 | 6.8 | 19,813 | 7.2 | 21,230 | 7.8 | 24,203 | 8.5 |
| American Indian and Alaska Native | NR | NR | 451 | 0.2 | 738 | 0.3 | 845 | 0.3 |
| Asian and Pacific Islander | NR | NR | 972 | 0.4 | 1,479 | 0.5 | 1,777 | 0.6 |
| Two or more races | NR | NR | NR | NR | NR | NR | 6,165 | 2.2 |

Source: U.S. Census

Table 18: Race of Population: Medina County

| | 1970 | | 1980 | | 1990 | | 2000 | |
|-----------------------------------|--------|---------|---------|---------|---------|---------|---------|---------|
| | Number | Percent | Number | Percent | Number | Percent | Number | Percent |
| White | 81,919 | 99.0 | 111,815 | 98.8 | 120,504 | 98.5 | 146,956 | 97.3 |
| African American or Black | 688 | 0.8 | 709 | 0.6 | 850 | 0.7 | 1,323 | 0.9 |
| American Indian and Alaska Native | NR | NR | 134 | 0.1 | 172 | 0.1 | 232 | 0.2 |
| Asian and Pacific Islander | NR | NR | 310 | 0.3 | 684 | 0.6 | 994 | 0.7 |
| Two or more races | NR | NR | NR | NR | NR | NR | 1,215 | 0.8 |

Source: U.S. Census

Appendix B

Fair Housing Complaint Data by County

Table 19: Number and Basis of Complaints filed with HUD and OCRC: Ashtabula County

| | Race | Color | Religion | National Origin | Gender | Familial Status | Disability | Other | Total |
|-------|------|-------|----------|-----------------|--------|-----------------|------------|-------|-------|
| 1990 | 0 | 0 | 0 | 1 | 0 | 0 | 0 | 0 | 1 |
| 1991 | 1 | 0 | 0 | 1 | 0 | 0 | 1 | 0 | 3 |
| 1992 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 1993 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 1994 | 3 | 0 | 0 | 0 | 1 | 0 | 2 | 1 | 7 |
| 1995 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1 |
| 1996 | 2 | 0 | 0 | 0 | 0 | 1 | 0 | 1 | 4 |
| 1997 | 1 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 2 |
| 1998 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 1999 | 0 | 0 | 0 | 0 | 0 | 1 | 1 | 0 | 2 |
| 2000 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1 |
| 2001 | 2 | 0 | 0 | 0 | 2 | 0 | 1 | 0 | 5 |
| 2002 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1 |
| 2003 | 0 | 0 | 0 | 0 | 0 | 0 | 2 | 0 | 2 |
| 2004 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1 |
| Total | 13 | 1 | 0 | 2 | 3 | 2 | 7 | 2 | 30 |

Source: HRAC analysis of HUD and OCRC data

Chart 2: Basis of Complaints Filed with HUD and OCRC: Ashtabula County

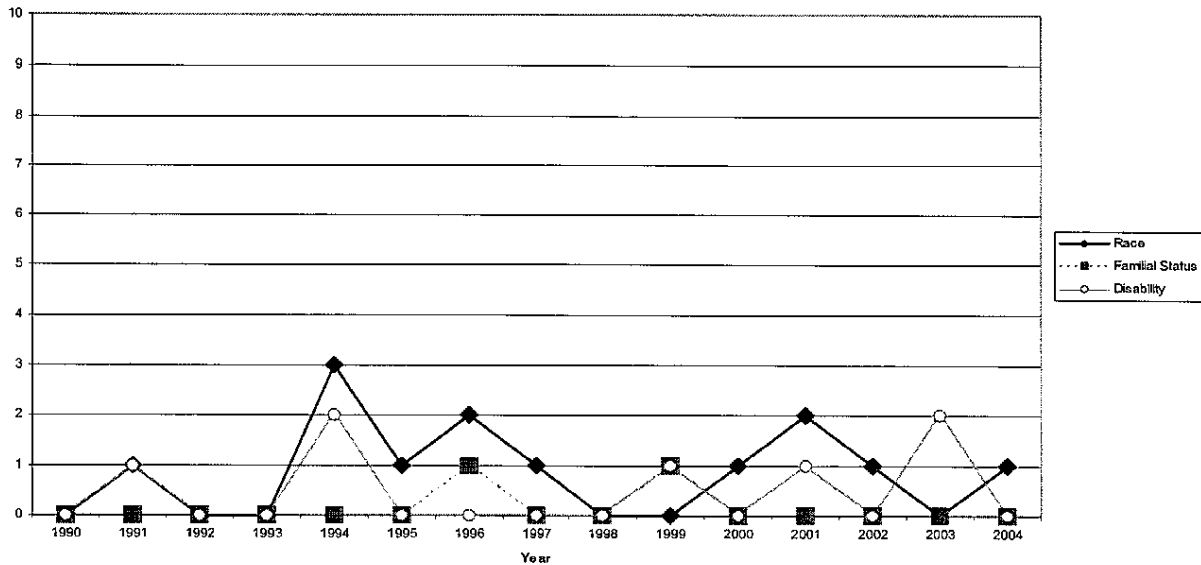


Table 20: Number and Basis of Complaints filed with HUD and OCRC: Cuyahoga County

| | Race | Color | Religion | National Origin | Gender | Familial Status | Disability | Other | Total |
|-------|------|-------|----------|-----------------|--------|-----------------|------------|-------|-------|
| 1990 | 44 | 0 | 0 | 2 | 10 | 36 | 7 | 0 | 99 |
| 1991 | 50 | 1 | 0 | 5 | 9 | 22 | 20 | 0 | 107 |
| 1992 | 68 | 0 | 2 | 10 | 21 | 15 | 24 | 1 | 141 |
| 1993 | 74 | 0 | 2 | 4 | 13 | 7 | 29 | 8 | 137 |
| 1994 | 37 | 1 | 3 | 5 | 12 | 1 | 16 | 19 | 94 |
| 1995 | 38 | 0 | 2 | 5 | 7 | 0 | 12 | 7 | 71 |
| 1996 | 39 | 0 | 2 | 7 | 5 | 8 | 12 | 8 | 81 |
| 1997 | 18 | 0 | 1 | 11 | 4 | 6 | 13 | 0 | 53 |
| 1998 | 24 | 0 | 1 | 2 | 4 | 5 | 14 | 2 | 52 |
| 1999 | 27 | 0 | 4 | 3 | 3 | 9 | 18 | 0 | 64 |
| 2000 | 30 | 0 | 1 | 7 | 4 | 59 | 18 | 0 | 119 |
| 2001 | 24 | 0 | 2 | 0 | 4 | 9 | 28 | 0 | 67 |
| 2002 | 27 | 0 | 5 | 4 | 7 | 11 | 26 | 0 | 80 |
| 2003 | 23 | 0 | 3 | 1 | 2 | 6 | 16 | 0 | 51 |
| 2004 | 32 | 1 | 1 | 2 | 4 | 5 | 26 | 0 | 71 |
| Total | 555 | 3 | 29 | 68 | 109 | 199 | 279 | 45 | 1287 |

Source: HRAC analysis of HUD and OCRC data

Chart 3: Basis of Complaints Filed with HUD and OCRC: Cuyahoga County

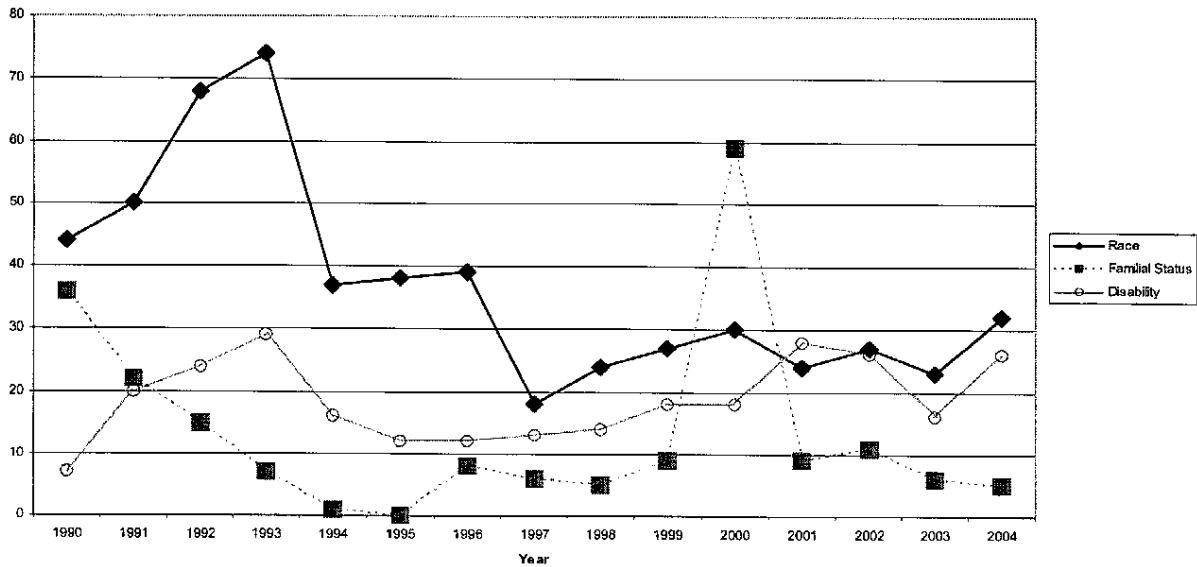


Table 21: Number and Basis of Complaints filed with HUD and OCRC: Geauga County

| | Race | Color | Religion | National Origin | Gender | Familial Status | Disability | Other | Total |
|-------|------|-------|----------|-----------------|--------|-----------------|------------|-------|-------|
| 1990 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 1991 | 2 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 2 |
| 1992 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 1993 | 3 | 0 | 0 | 0 | 0 | 1 | 2 | 0 | 6 |
| 1994 | 2 | 0 | 0 | 0 | 0 | 0 | 0 | 1 | 3 |
| 1995 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 1996 | 0 | 0 | 0 | 0 | 0 | 0 | 1 | 0 | 1 |
| 1997 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 1998 | 2 | 0 | 0 | 0 | 1 | 0 | 2 | 0 | 5 |
| 1999 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 2000 | 0 | 0 | 0 | 0 | 0 | 1 | 0 | 0 | 1 |
| 2001 | 0 | 1 | 0 | 0 | 0 | 0 | 1 | 0 | 2 |
| 2002 | 0 | 0 | 0 | 0 | 0 | 0 | 1 | 0 | 1 |
| 2003 | 0 | 0 | 0 | 0 | 0 | 0 | 1 | 0 | 1 |
| 2004 | 0 | 0 | 1 | 0 | 0 | 0 | 1 | 0 | 2 |
| Total | 9 | 1 | 1 | 0 | 1 | 2 | 9 | 1 | 24 |

Source: HRAC analysis of HUD and OCRC data

Chart 4: Basis of Complaints Filed with HUD and OCRC: Geauga County

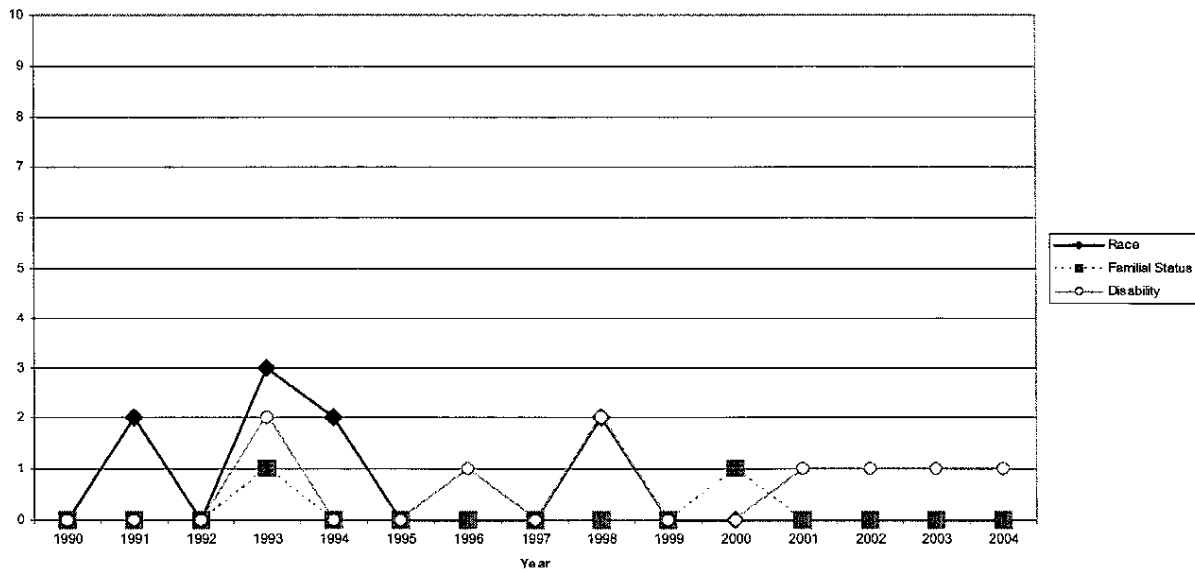


Table 22: Number and Basis of Complaints filed with HUD and OCRC: Lake County

| | Race | Color | Religion | National Origin | Gender | Familial Status | Disability | Other | Total |
|-------|------|-------|----------|-----------------|--------|-----------------|------------|-------|-------|
| 1990 | 3 | 0 | 0 | 0 | 1 | 9 | 1 | 0 | 14 |
| 1991 | 8 | 0 | 0 | 1 | 0 | 11 | 3 | 0 | 23 |
| 1992 | 4 | 0 | 0 | 4 | 0 | 7 | 0 | 0 | 15 |
| 1993 | 2 | 0 | 0 | 1 | 2 | 0 | 1 | 4 | 10 |
| 1994 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 4 | 5 |
| 1995 | 1 | 0 | 0 | 0 | 1 | 0 | 3 | 1 | 6 |
| 1996 | 4 | 0 | 0 | 1 | 2 | 2 | 2 | 0 | 11 |
| 1997 | 1 | 0 | 0 | 0 | 0 | 1 | 0 | 0 | 2 |
| 1998 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1 |
| 1999 | 3 | 0 | 0 | 0 | 2 | 0 | 1 | 0 | 6 |
| 2000 | 1 | 0 | 0 | 0 | 0 | 2 | 2 | 0 | 5 |
| 2001 | 1 | 0 | 0 | 0 | 2 | 2 | 4 | 0 | 9 |
| 2002 | 5 | 0 | 0 | 0 | 0 | 2 | 2 | 0 | 9 |
| 2003 | 11 | 0 | 0 | 3 | 1 | 4 | 9 | 0 | 28 |
| 2004 | 7 | 0 | 0 | 0 | 0 | 1 | 5 | 0 | 13 |
| Total | 53 | 0 | 0 | 10 | 11 | 41 | 33 | 9 | 157 |

Source: HRAC analysis of HUD and OCRC data

Chart 5: Basis of Complaints Filed with HUD and OCRC: Lake County

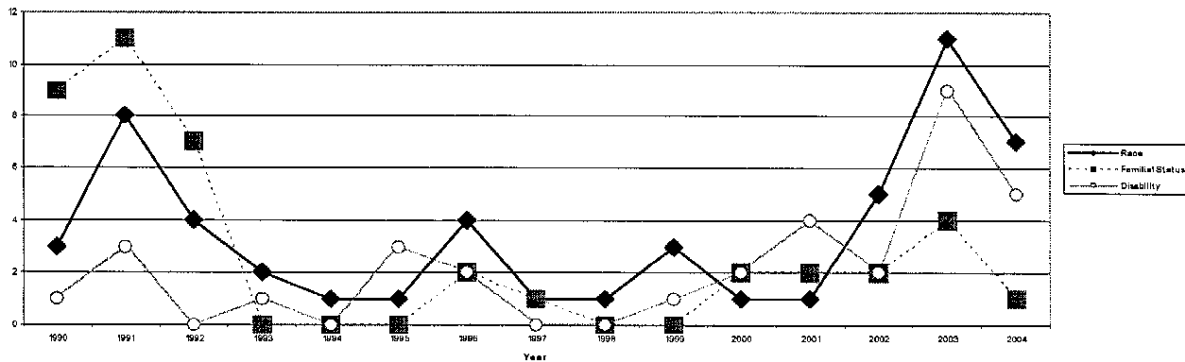


Table 23: Number and Basis of Complaints filed with HUD and OCRC: Lorain County

| | Race | Color | Religion | National Origin | Gender | Familial Status | Disability | Other | Total |
|-------|------|-------|----------|-----------------|--------|-----------------|------------|-------|-------|
| 1990 | 6 | 0 | 0 | 0 | 0 | 1 | 0 | 0 | 7 |
| 1991 | 5 | 0 | 0 | 0 | 0 | 4 | 1 | 0 | 10 |
| 1992 | 1 | 0 | 0 | 0 | 1 | 1 | 1 | 0 | 4 |
| 1993 | 4 | 0 | 0 | 3 | 0 | 0 | 0 | 0 | 7 |
| 1994 | 4 | 0 | 0 | 2 | 2 | 0 | 1 | 0 | 9 |
| 1995 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 3 | 4 |
| 1996 | 3 | 0 | 0 | 0 | 1 | 0 | 1 | 0 | 5 |
| 1997 | 3 | 0 | 0 | 0 | 0 | 1 | 1 | 0 | 5 |
| 1998 | 4 | 1 | 1 | 0 | 0 | 1 | 0 | 0 | 7 |
| 1999 | 3 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 3 |
| 2000 | 1 | 0 | 0 | 0 | 0 | 0 | 3 | 0 | 4 |
| 2001 | 1 | 0 | 0 | 1 | 2 | 3 | 1 | 0 | 8 |
| 2002 | 0 | 0 | 0 | 0 | 1 | 0 | 1 | 0 | 2 |
| 2003 | 1 | 0 | 0 | 0 | 0 | 0 | 3 | 0 | 4 |
| 2004 | 4 | 1 | 0 | 1 | 1 | 1 | 6 | 0 | 14 |
| Total | 41 | 2 | 1 | 7 | 8 | 12 | 19 | 3 | 93 |

Source: HRAC analysis of HUD and OCRC data

Chart 6: Basis of Complaints Filed with HUD and OCRC: Lorain County

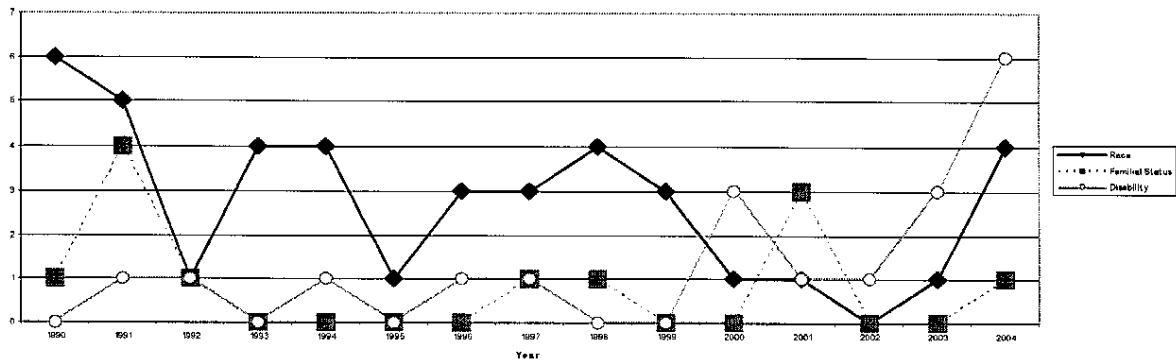
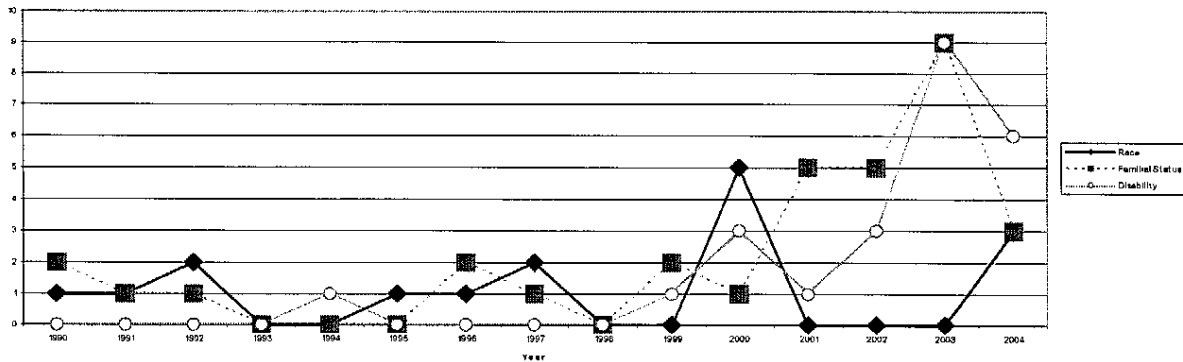


Table 24: Number and Basis of Complaints filed with HUD and OCRC: Medina County

| | Race | Color | Religion | National Origin | Gender | Familial Status | Disability | Other | Total |
|-------|------|-------|----------|-----------------|--------|-----------------|------------|-------|-------|
| 1990 | 1 | 0 | 0 | 1 | 1 | 2 | 0 | 0 | 5 |
| 1991 | 1 | 0 | 0 | 0 | 1 | 1 | 0 | 0 | 3 |
| 1992 | 2 | 0 | 0 | 0 | 0 | 1 | 0 | 0 | 3 |
| 1993 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 1994 | 0 | 0 | 0 | 0 | 0 | 0 | 1 | 2 | 3 |
| 1995 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 1 | 2 |
| 1996 | 1 | 0 | 0 | 0 | 1 | 2 | 0 | 0 | 4 |
| 1997 | 2 | 0 | 0 | 0 | 0 | 1 | 0 | 0 | 3 |
| 1998 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 1999 | 0 | 0 | 0 | 0 | 0 | 2 | 1 | 0 | 3 |
| 2000 | 5 | 0 | 0 | 0 | 0 | 1 | 3 | 0 | 9 |
| 2001 | 0 | 0 | 0 | 0 | 1 | 5 | 1 | 0 | 7 |
| 2002 | 0 | 0 | 0 | 1 | 0 | 5 | 3 | 0 | 9 |
| 2003 | 0 | 0 | 0 | 0 | 1 | 9 | 9 | 0 | 19 |
| 2004 | 3 | 1 | 0 | 1 | 0 | 3 | 6 | 0 | 14 |
| Total | 16 | 1 | 0 | 3 | 5 | 32 | 24 | 3 | 84 |

Source: HRAC analysis of HUD and OCRC data

Chart 7: Basis of Complaints Filed with HUD and OCRC: Medina County



Appendix C

Methodology for Calculating Instances of Housing Discrimination

The Housing Center estimates that there were at a minimum 33,690 instances of housing discrimination based against African Americans, Hispanics/Latinos, and Asian Americans in 2004 in the six-county region.

This estimate was calculated using the methodology developed by Professor John Simonson, from the University of Wisconsin, Platteville, in a series of papers he produced in 2004 for the National Fair Housing Alliance estimating the number of instances of discrimination nationwide.³⁶

In reaching our estimate of the number of instances of discrimination, we first determined the rate of discrimination against African Americans, Hispanics/Latinos, and Asian Americans using Professor Simonson's methodology. For renters, this methodology takes into account the number of housing units a typical renter inspects before choosing housing, as well as the rate of discrimination at specific instances in the housing search process. For homeowners, it takes into account the average number of real estate agents a typical homeowner consults in the course of a housing search. We then multiplied this overall rate of discrimination for each group by the number of individuals in each group (renters and homeowners) who had moved in 2004 in the Cleveland metropolitan area based on the American Housing Survey.³⁷ This corresponds to 26,687 instances of discrimination among renters and 3,190 instances among homeowners, for a total of 29,877 instances of discrimination in these five counties.

The Housing Center then adjusted for the population of Lorain County, assuming that for both renters and homeowners, housing mobility for African American (as well as Hispanic/Latino and Asian American) in Lorain County is consistent with the rates in the rest of the Cleveland

³⁶John Simonson, "National Estimates of Annual Discrimination Against Black Households in U.S. Rental and Sales Markets," Project Report 03-01, Center for Applied Public Policy, UW-Platteville (January 2004) and John Simonson, "National Estimates of Annual Discrimination in U.S. Rental and Sales Markets Against: Asians and Pacific Islanders, Hispanics, and Native Americans," Center for Applied Public Policy, UW-Platteville (April 2004).

³⁷U.S. Department of Housing and Urban Development and U.S. Census Bureau, Current Housing Reports, Series H170/04-45, "American Housing Survey for the Cleveland Metropolitan Area: 2004," Table 3.1. Introductory Characteristics - Owner Occupied Units and Table 4.1. Introductory Characteristics - Renter Occupied Units. The AHS survey reports data for Ashtabula, Cuyahoga, Geauga, Lake, and Medina Counties. Lorain County is not included in its data. In making these calculations, the Housing Center assumes that discrimination rates in the region correspond to those found nationally by HUD in its survey. Although HUD found some variability across metropolitan areas, the overall levels of treatment were not significantly different from the national averages, and the report concluded that "discrimination against African American and Hispanic homeseekers remains a problem in large metropolitan areas nationwide – that no region of the country or group of metropolitan areas is exempt." Urban Institute, "Discrimination in Metropolitan Housing Markets: Phase I" (November 2002), p. 8-6, available at www.hudclips.org.

region.³⁸ Using this formula, the Housing Center estimated an additional 3,813 cases of housing discrimination in Lorain County (3,529 among renters and 284 among homeowners) against African Americans, Hispanics/Latinos, and Asian Americans/Pacific Islanders, making a total of 33,690 instances of discrimination based on these grounds alone.

This data does not include data on discrimination based on other protected classes, such as disability or familial status. The Housing Center considers this to be a conservative estimate for a number of reasons:

- the figures do not include discrimination against Native Americans, bi-racial individuals, or other racial/ethnic groups (such as Arab Americans, for example) due to data limitations;
- the data only covers discrimination in the rental and home sale markets, and not discrimination in homeowners insurance or mortgage lending;
- the data is based on the Urban Institute's survey, which did not include many smaller units (which comprise a large proportion of the rental market), and did not include discrimination occurring at the initial telephone contact or after an application has been submitted by a housing seeker.

³⁸These rates were calculated for African American, Hispanic/Latino, and Asian American/Pacific Islander households for both renters and homeowners. We estimate that among renters in Lorain County, 1,534 African American households moved, 1,711 Hispanic/Latino households moved, and 145 Asian American/Pacific Islander households moved. Among homeowners in Lorain County, we estimate that 314 African American households moved, 321 Hispanic/Latino households moved, and 43 Asian American/Pacific Islander households moved.

Appendix D

Data Sources

Table 1: "Population of Counties by Decennial Census: 1900 to 1990," March 27, 1995.
Compiled and edited by: Richard L. Forstall, Population Division, U.S. Bureau of
Census, Washington, D.C.; Table DP-1. Profile of General Demographic Characteristics:
2000.

Table 2: Bureau of Census, Table DP-1. Profile of General Demographic Characteristics: 2000;
Table DP-1. General Population and Housing Characteristics: 1990; Table 3.
Components of Population Change by Race: 1970 and 1960; Table P-1. General
Characteristics of the Population: 1970; Table 1. Summary of General Population
Characteristics: 1980; Table 35. Age by Race and Sex, for Counties: 1970.

Table 3: Bureau of Census, Table DP-1. Profile of General Demographic Characteristics: 2000;
Table DP-1. General Population and Housing Characteristics: 1990; Table P-7. Race and
Spanish Origin: 1980; Table 1. Summary of General Population Characteristics: 1980.

Table 4: Bureau of Census, Table DP-2. Profile of Selected Social Characteristics: 2000.

Table 5: Bureau of Census, Profile of General Demographic Characteristics: 2000.

Table 6: Bureau of Census, Table DP-2. Profile of General Demographic Characteristics: 2000.

Table 7: Bureau of Census, Table DP-1. Profile of General Demographic Characteristics: 2000.

Table 8: Bureau of Census, Table 2. Summary of General Housing Characteristics: 1980; Table
H-1. Occupancy, Utilization, and Financial Characteristics of Housing Units: 1980;
Table DP-1. Profile of General Demographic Characteristics: 2000; Table DP-1.
General Population and Housing Characteristics: 1990.

Table 9: Compiled by Housing Research & Advocacy Center.

Table 10: Housing Research & Advocacy Center analysis of data provided by U.S. Department
of Housing and Urban Development and Ohio Civil Rights Commission.

Tables 11 & 12: Bureau of Census, Housing and Household Economic Statistics Division, 2005.

Tables 13-18: Bureau of Census, Table DP-1. Profile of General Demographic Characteristics:
2000; Table DP-1. General Population and Housing Characteristics: 1990; Table 3.
Components of Population Change by Race: 1970 and 1960; Table P-1. General
Characteristics of the Population: 1970; Table 1. Summary of General Population

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Characteristics: 1980; Table 35. Age by Race and Sex, for Counties: 1970.

Tables 19-24: Housing Research & Advocacy Center analysis of data provided by U.S. Department of Housing and Urban Development and Ohio Civil Rights Commission.

Charts 1-7: Housing Research & Advocacy Center analysis of data provided by U.S. Department of Housing and Urban Development and Ohio Civil Rights Commission.