

Housing Voucher Discrimination and Race Discrimination in Cuyahoga County

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The substance and findings of this work are dedicated to the families that depend on public housing assistance who have been thwarted by housing discrimination, legal and illegal, in their attempts to improve their own lives.

About Housing Research & Advocacy Center

Housing Research & Advocacy Center (The Housing Center) is a 501(c)(3) non-profit organization whose mission is to promote fair housing and diverse communities; and to work to eliminate housing discrimination in Northeast Ohio by providing effective research, education, and advocacy. 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, complaint investigation and resolution, 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

In 2016, the Housing Research & Advocacy Center (The Housing Center) examined housing patterns of participants in the Housing Choice Voucher Program (HCVP) in Cuyahoga County.¹ HCVP participants, 89.6% of whom are African American, are clustered in areas with high concentrations of poverty, crime, low educational opportunities, and high exposure to environmental health hazards. When surveyed, the majority of HCVP participants responded that they desire to live in areas with low crime rates and high quality schools and many also want to live in areas with low poverty. Many commented that they would be willing to move to live in neighborhoods that have those qualities, but HCVP participants are excluded from much of Cuyahoga County. The Housing Center identified housing policies that limit choices of HCVP participants that include a region-wide voucher payment standard (Fair Market Rent) that is insufficient for participants to gain access to high-opportunity areas and the continual siting of Low Income Housing Tax Credit units, which are required to accept Housing Choice Vouchers, in low-opportunity neighborhoods throughout Cuyahoga County. Nearly 80% of HCVP participants surveyed reported that one barrier to finding housing is that landlords refuse (legally in most of Cuyahoga County) to accept housing vouchers, the most reported challenge. Using an investigatory technique known as “testing,” this report explores the role housing providers play in limiting the housing choices of HCVP participants in Cuyahoga County: how refusal to take a voucher might serve as a proxy for race-based discrimination and how limited housing choices perpetuate racial segregation.

The Housing Center used race-based, matched-pair, email testing (one African American tester and one white tester per test) to compare the incidences of “unfavorable treatment” on the basis of race by housing providers that advertise that they do not accept housing vouchers (Experiment Group) compared to the prevalence of unfavorable treatment on the basis of race by housing providers that state no preference for housing vouchers (Control Group). Differences in race-based discrimination could show that housing providers are racially motivated when refusing to accept vouchers. The Housing Center found unfavorable treatment against the African American tester by the Experiment Group in 26.4% of tests and by the Control Group in 20.9% of tests. The white tester experienced unfavorable treatment from the Experiment Group in 5.8% of tests and from the Control Group in 16.1% of tests. Some housing providers in the Experiment Group seem to be responding to housing inquiries on the basis of the race of the tester more often than the Control Group, evidenced by the more than 20% difference in unfavorable treatment between the African American and white testers by the Experiment Group and by the 5.5% increase in unfavorable treatment of the African American tester by the Control Group in the Experiment Group. Additionally, the only form of unfavorable treatment experienced by the white tester was ignoring on the part of the housing provider. The African American tester was told units were unavailable while the white tester was offered time to view the unit; the African American tester was given less information than the white tester; and the African American tester was vetted more stringently than the white tester. In several tests the first response received by the African American tester was analogous to “we don’t accept vouchers” showing that some housing providers associate African Americans with HCVP in Cuyahoga County (no tester mentioned a voucher in this series of tests). The white tester did not experience these forms of treatment in any test.

The Housing Center assessed the effect that the refusal to accept housing vouchers has on maintaining segregated living patterns in Cuyahoga County by using one-part and two-part tests. In this series of tests, an African American female tester with children asked a housing provider if they accept a voucher at properties in census tracts that do not have a concentration of housing vouchers. If they got no response, a white female tester with children made a second inquiry in order to detect ignoring. The tester using a voucher was denied housing in 91.2% of tests, showing that housing providers effectively lock HCVP participants in their current neighborhoods and maintain racial segregation in Cuyahoga County.

¹ Lenore Healy & Michael Lepley, “Housing Voucher Mobility in Cuyahoga County,” Housing Research & Advocacy Center (February 2016). Available at: <http://www.thehousingcenter.org/wp-content/uploads/2016/02/Cuyahoga-County-Voucher-Mobility-Report.pdf>

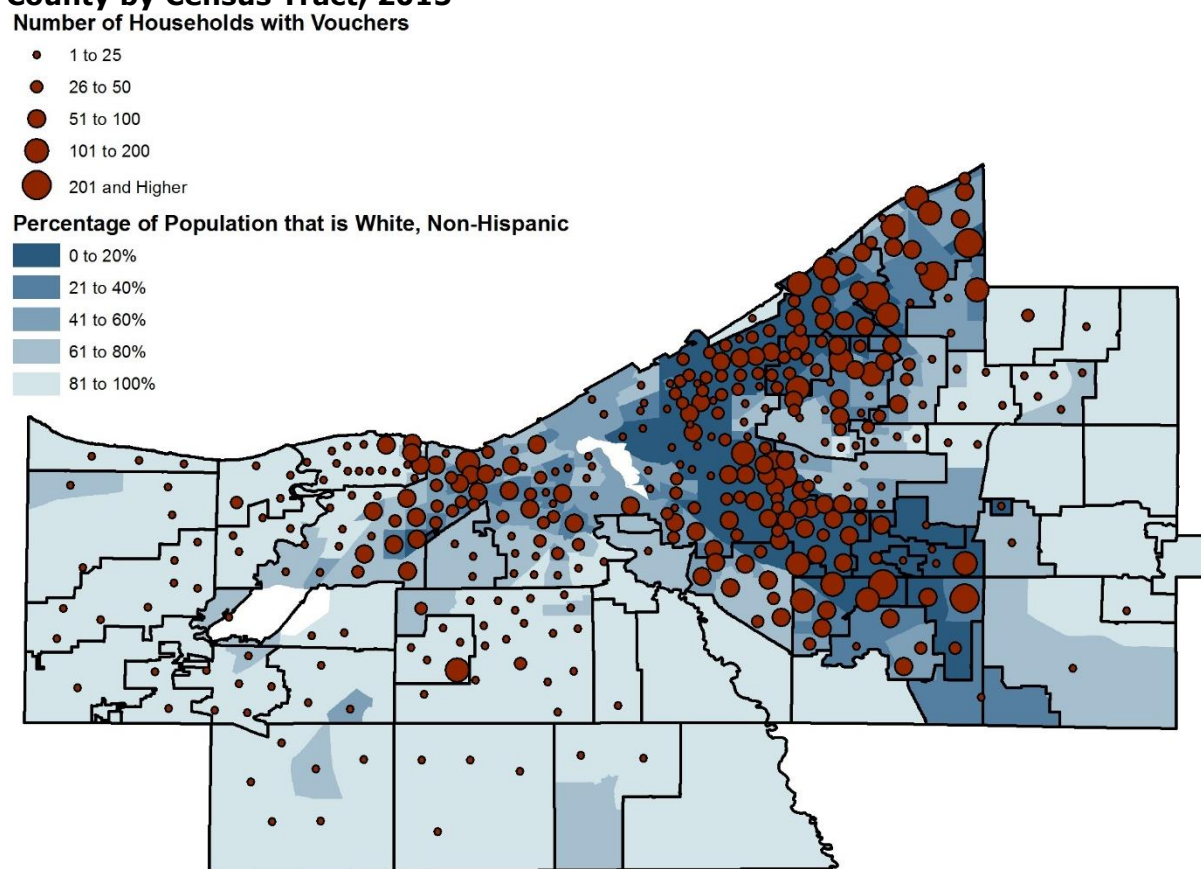
The Housing Center recommends:

1. Prohibit housing voucher discrimination throughout Cuyahoga County
2. Ensure all HCVP participants are informed of their fair housing rights by their public housing authority
3. Create a mobility counselling program that assists tenants in moving to high-opportunity neighborhoods and recruits, provides technical assistance to, and financially incentivizes landlords to participate in the HCVP in high-opportunity neighborhoods
4. Provide security deposit assistance to HCVP participants moving to high-opportunity neighborhoods
5. Implement Small Area Fair Market rent to consider variation in local rental markets

II. HOUSING VOUCHER MOBILITY IN CUYAHOGA COUNTY

In 2016 the Housing Research & Advocacy Center (The Housing Center) released a report, titled “Housing Voucher Mobility in Cuyahoga County” (Mobility Report), that showed that households using housing vouchers in Cuyahoga County are clustered in racially segregated (see Figure 1), high-poverty neighborhoods that have the highest incidence of crime, highest exposure to environmental health hazards, and the lowest educational outcomes in Cuyahoga County.² The hallmark of the Housing Choice Voucher Program (HCVP) is residential choice and mobility.³ The HCVP is meant to give participants the option to live wherever they want, but in Cuyahoga County and in other cities across the United States, HCVP participants find their options for housing limited. In Cuyahoga County, the HCVP contributes to racial segregation.

Figure 1: Households with Vouchers and Minority Concentrations in Cuyahoga County by Census Tract, 2015



(Source: HUD, A Picture of Subsidized Housing, 2015; 2015 American Community Survey 5-Year Estimates)

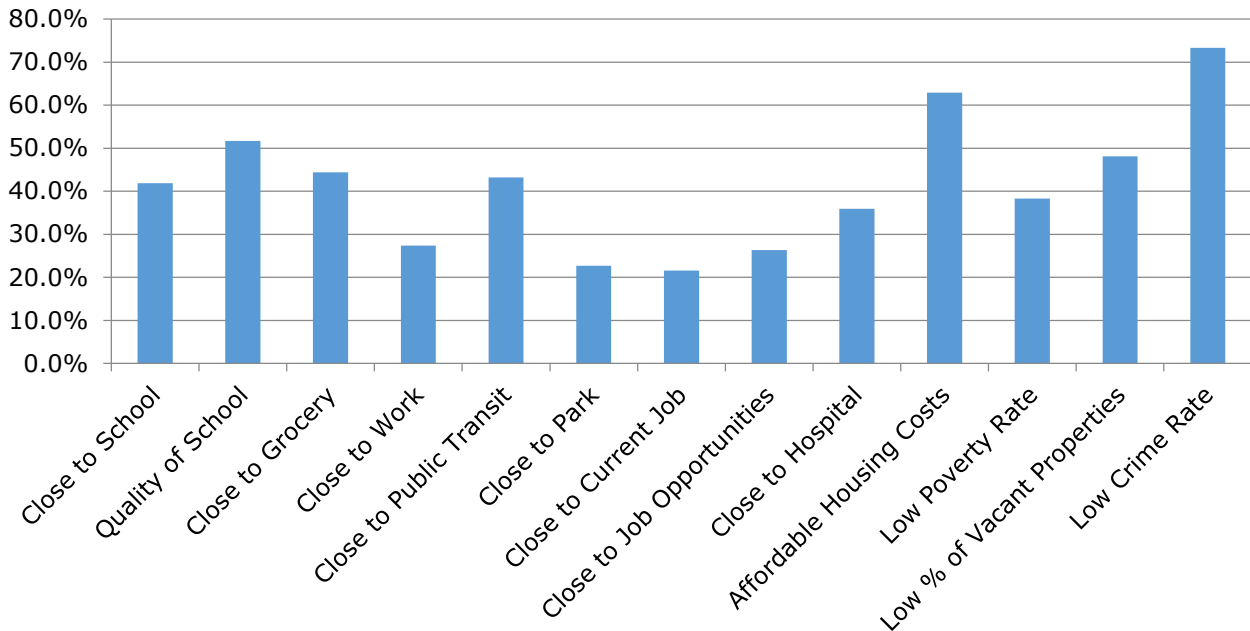
The Housing Center surveyed 532 voucher holders to understand what they wanted in a neighborhood and how programmatic and market forces affected their decisions (see page 35 of the Mobility Report for survey methodology and in-depth analysis of the survey findings). The majority of respondents reported that they wanted to live in neighborhoods with low crime (73%) and quality schools (51.7%) and they

² Lenore Healy & Michael Lepley, “Housing Voucher Mobility in Cuyahoga County,” Housing Research & Advocacy Center (February 2016). Available at: <http://www.thehousingcenter.org/wp-content/uploads/2016/02/Cuyahoga-County-Voucher-Mobility-Report.pdf>

³ U.S. Department of Housing and Urban Development, “Section-8 Tenant Based Housing Assistance: A Look Back After 30 Years,” (March, 2000), 10.

needed housing they could afford with their voucher (62.9%) to move to neighborhoods that met that criteria (see Figure 2).

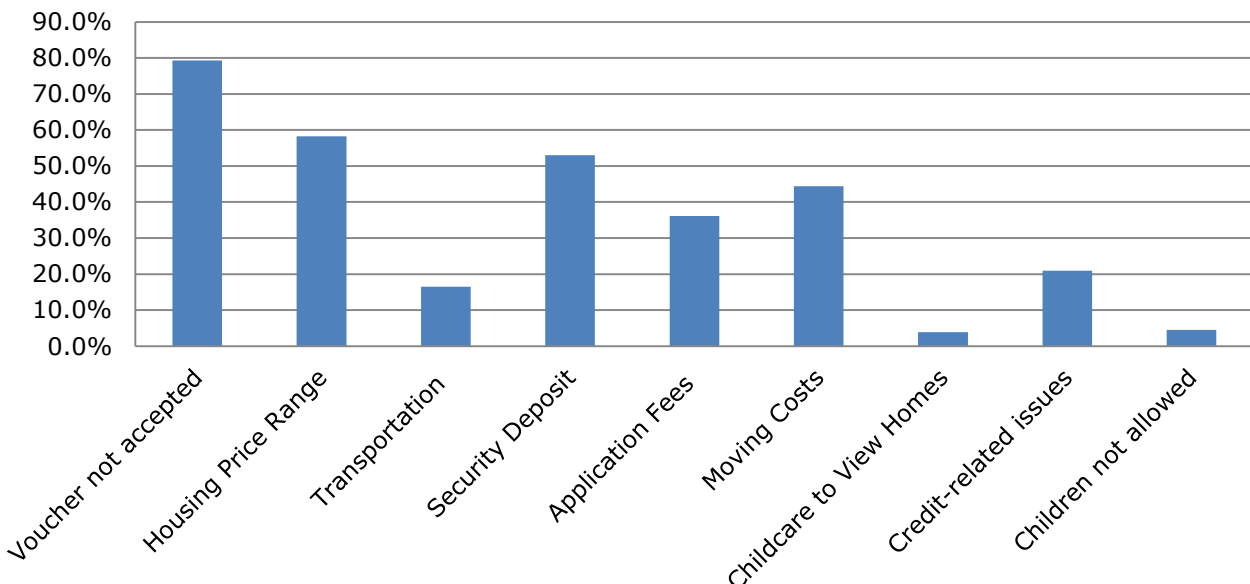
Figure 2: Factors Important to Voucher Holders When Seeking Housing



(Source: Lenore Healy & Michael Lepley, "Housing Voucher Mobility in Cuyahoga County.")

The majority of respondents cited three factors that limited their choices when seeking housing (see Figure 3): refusal of landlords to accept vouchers (79.3%), limited housing that they could afford within the payment standard set by the U.S. Department of Housing and Urban Development (HUD) and the public housing authority (PHA; 58.3%), and the upfront cost of a security deposit (53.0%).

Figure 3: Challenges Faced by Voucher Households



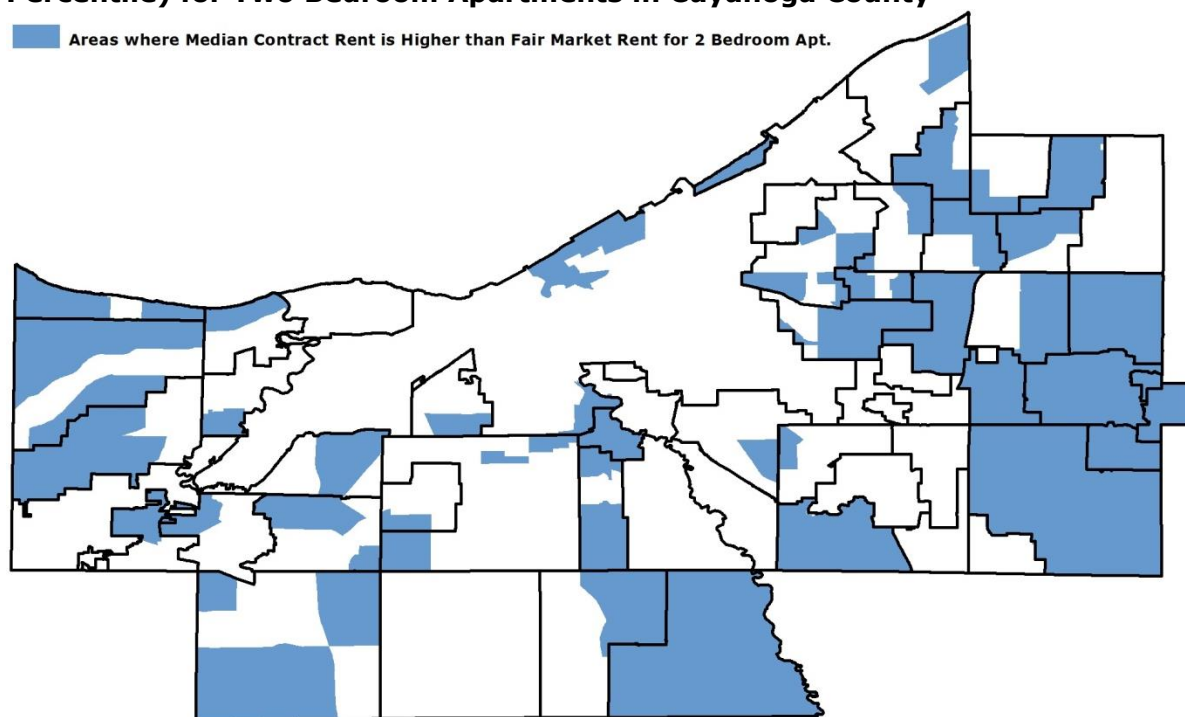
(Source: Lenore Healy & Michael Lepley, "Housing Voucher Mobility in Cuyahoga County.")

A. Housing Affordability and Housing Vouchers

There are four entities that administer housing vouchers in Cuyahoga County (see page 3 of the Mobility Report for a more in-depth description of housing voucher programs and public housing authorities in Cuyahoga County): Cuyahoga Metropolitan Housing Authority (CMHA), Parma Public Housing Agency (PPHA), Emerald Development & Economic Network, Inc. (EDEN), and New Avenues to Independence. CMHA is one of the largest housing authorities in the United States and administers the majority of housing vouchers in Cuyahoga County. CMHA administers 95% of vouchers in Cuyahoga County—15,269 out of 16,011.⁴

The voucher Payment Standard is set by the PHA, but HUD regulations mandate that the Payment Standard is set between 90% and 110% of the HUD-published Fair Market Rent (FMR) for that area. PHAs either use FMR based on 40th percentile or 50th percentile FMR. CMHA is a 50th percentile agency. At the time when the Mobility Report was being written, CMHA paid between 4% and 7% under FMR for the most in-demand unit sizes, 2 and 3 bedroom units. This caused voucher participants to be priced out of much of Cuyahoga County (see Figure 4 and page 13 of the Mobility Report).

Figure 4: Areas where 2014 Median Contract Rent is Higher than 2015 FMR (50th Percentile) for Two Bedroom Apartments in Cuyahoga County



(Source: 2013 American Community Survey 5-Year Estimates)

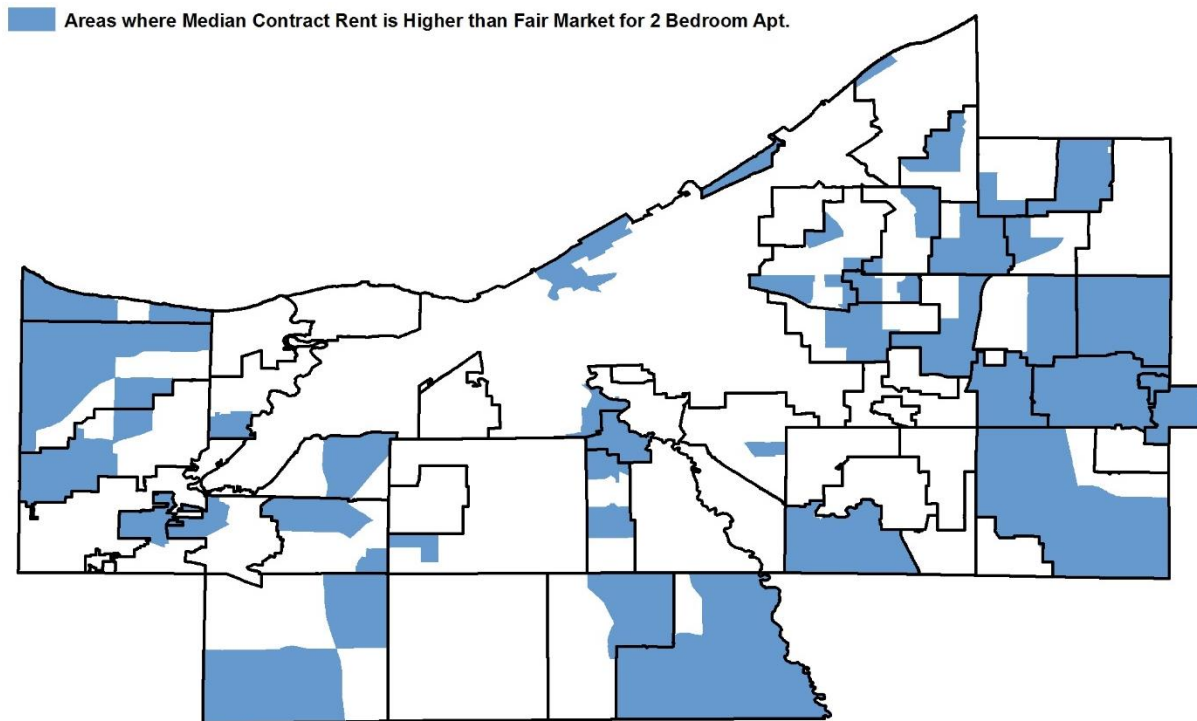
In 2017, both FMR and the payment standard rate used by CMHA have risen (see Table 1), but voucher participants are still priced out of much of Cuyahoga County (see Figure 5).

⁴ U.S. Department of Housing & Urban Development, Picture of Subsidized Households: CMHA & PPHA Housing Choice Voucher Program, 2016 Query: https://www.huduser.gov/portal/datasets/assthsg.html#2009-2016_query.

Table 1: Fair Market Rent and PHA Payment Standards in Cuyahoga County, 2017

Number of Bedrooms:	Efficiency	1	2	3	4	5	6
40th Percentile FMR 2017	\$524	\$626	\$781	\$1,027	\$1,088	\$1,251	\$1,414
50th Percentile FMR 2017	\$561	\$671	\$836	\$1,099	\$1,164	\$1,338	\$1,513
CMHA 2017 Payment Standard	\$570	\$673	\$850	\$1,125	\$1,164	\$1,338	\$1,513
PPHA 2017 Payment Standard	\$524	\$626	\$781	\$1,027	\$1,088	\$1,251	\$1,414

(Source: HUD User, Fair Market Rent and Income Limit; Cuyahoga Metropolitan Housing Authority; Parma Public Housing Agency)

Figure 5: Areas where 2015 Median Contract Rent is Higher than 2017 FMR (50th Percentile) for Two Bedroom Apartments in Cuyahoga County

(Source: 2015 American Community Survey 5-Year Estimates)

The Housing Center recommended that issues of affordability could be overcome by implementing specific program and policy changes, which included (see page 48 of the Mobility Report):

- Small Area Fair Market Rent, which would allow a PHA to be more sensitive to local markets with payment standards
- Moving cost and security deposit assistance
- Mobility counseling to support HCVP participants wishing to move
- Marketing the HCVP to housing providers in high-opportunity neighborhoods

B. Landlord Refusal to Accept a Housing Voucher

The Housing Center surveyed 70 landlords in Cuyahoga County, both those that currently do—or have in the past—participated in a housing voucher program and those that do not participate in the program (see page 43 of the Mobility Report for a full analysis of Housing Provider Surveys). The majority of those surveyed that have or do participate in the program (54.2%) reported dissatisfaction with the HCV Program (52.6%). In the written comments section, landlords reported issues with the PHA including low rents, late payments, and slow or burdensome inspections and approval processes. The majority of those surveyed who do not participate in the program reported that they had simply never looked into it (61.8%). Both groups of landlords held a variety of stereotypes about voucher participants.

Nearly 80% of HVCP participants surveyed reported that a barrier to finding housing is that landlords refuse to accept housing vouchers, the most reported challenge (see Figure 3). Using an investigatory technique known as “testing,” this report explores the role housing providers play in limiting the housing choices of HCV participants in Cuyahoga County: how refusal to take a voucher might serve as a proxy for race-based discrimination and how limited housing choices perpetuate racial segregation.

III. REVIEW OF PREVIOUS LITERATURE

Throughout the United States, fair housing laws allow landlords to legally refuse to accept housing vouchers and thereby discriminate against voucher program participants based upon their “source of income” (SOI). A survey of private landlords in Austin, Texas showed that 91% of private landlords legally refuse to accept housing vouchers.⁵ A systemic program of housing testing in Washington D.C., performed before local regulations prohibited discrimination of housing vouchers, showed that 61% of landlords refused to accept vouchers.⁶ A significant portion of the rental units was unavailable to voucher program participants in those cities. Landlords may refuse a voucher for a number of reasons. Accepting voucher payments could impose a greater financial burden on a landlord. Units are subject to annual inspections to ensure HCVP participants are living in quality housing, but landlords noted that PHAs are often untimely in carrying out inspections and in verifying that repairs had been made. This prevents the unit from generating income during that period. Landlords also reported that some PHAs have been late with payments.⁷ Difficulties in dealing with a local PHA could have the effect of discouraging landlords from participating in the program. As shown in a systemic program of housing testing in Chicago after discrimination of housing vouchers was made illegal, landlords often continued to illegally refuse to accept vouchers from housing “testers” or make units unavailable in nearly 70% of tests.⁸

There is also a stigma associated with housing vouchers that may discourage some housing providers from engaging in the program. Housing vouchers and other forms of housing assistance have become linked to racialized poverty in the United States to the point where the phrase “Section 8” is used as a racial slur referring to low-income African Americans.⁹ Researchers and fair housing advocates have long proposed that the refusal to accept a housing voucher can serve as a proxy for race-based housing discrimination.¹⁰ In the Chicago study, 19% of the landlords who agreed to accept a voucher from a white tester refused to accept one from an African American or Latino tester.¹¹ Some suburban cities in Cuyahoga County have been shown to pass criminal activity nuisance ordinances, laws that penalize property owners for nuisance activity on or near a property, as a way to target African American renters and HCVP participants in order to remove them from their housing. Often the cities asked CMHA to

⁵ Austin Tenants’ Council, “An Audit Report on the Refusal of Housing Choice Vouchers by Landlords in the Austin MSA,” (2012), 2-3.

⁶ Equal Rights Center, “Will You Take My Voucher?: An Update on Housing Choice Voucher Discrimination in the District of Columbia,” (2013), 9-11.

⁷ Jennifer Pashup, Kathryn Edin, Greg Duncan, and Karen Burke, “Participation in a Residential Mobility Program From the Client’s Perspective: Findings From Gautreaux Two,” *Housing Policy Debate* vol. 16, issue 3-4 (2005), 361-392.

Mathew D. Marr, “Mitigating Apprehension about Section 8 Vouchers: The Positive Role of Housing Specialists in Search and Placement,” *Housing Policy Debate* vol. 16, issue 1 (2005), 85-111.

⁸ Lawyers Committee for Better Housing, Inc., “Locked Out: Barriers to Choice for Housing Voucher Holders,” (2002), 10-11.

⁹ Emily Badger, “How Section 8 Became a Racial Slur: A History of Public Housing in America,” *Washington Post*, June 15, 2015.

¹⁰ Martha M. Galvez, “What Do We Know About Housing Choice Voucher Program Location Outcomes?” Urban Institute (2010).

Paula Beck, “Fighting Section 8 Discrimination: The Fair Housing Act’s New Frontier,” *Harvard Civil Rights-Civil Liberties Review* vol. 31 (1996), 155-186.

¹¹ Lawyers Committee for Better Housing, Inc., “Locked Out: Barriers to Choice for Housing Voucher Holders,” (2002), 10.

revoke vouchers as part of this action.¹² In several communities in California, white residents in majority-white suburbs organized in order to use the functions of local government to harass, intimidate, and remove African American recipients of housing subsidies from their neighborhoods. They formed neighborhood groups to lobby their elected leaders who in turn used their police departments to surveil and intimidate participants of housing voucher programs and African American renters who were perceived to be participants of housing voucher programs. The police departments in the four studied cities pressured housing authorities to revoke vouchers from participants and pressured landlords to refuse to accept them. Some went so far as to form special police units that focused on the tasks of racialized harassment and removal.¹³ Race-based discrimination continues to persist in the United States and in Northeast Ohio. In a national study, it was shown that African American renters are shown 11.4% fewer units than white renters. Further, it is estimated that over 30,000 acts of housing discrimination are carried out against African Americans and Latinos in Northeast Ohio.¹⁴ In the six-county region of Northeast Ohio analyzed by The Housing Center, race discrimination accounts for the greatest number of fair housing complaints over the past twenty-six years at 32.3% (1,240 complaints), followed by 31.3% familial status complaints, and 26.9% disability complaints. In Cuyahoga County alone, there were 1,026 race-based complaints, accounting for 35.4% of all fair housing complaints over the last 26 years, followed by 23.4% disability complaints and 20.8% familial status complaints.¹⁵

Since participants of the HCVP are disproportionately members of classes protected under the Fair Housing Act (which prohibits discrimination on the bases of race, color, religion, national origin, sex, familial status, and disability), it is possible that discrimination of vouchers could cause a disparate impact on the basis of one or more protected classes.¹⁶ In 2016, 91.1% of CMHA HCVP participants were African American and 8.2% were white. Families with children comprised 35.9% of households. For those families with children under 18, 97.4% were female-headed households having at least two children in the household.¹⁷ Nearly 37% of households were headed by a person having a disability.¹⁸ Discrimination of vouchers could also perpetuate racial segregation. The Cleveland-Elyria MSA is the 5th most segregated

¹² Joseph Mead, Megan E. Hatch, J. Rosie Tighe, Marissa Pappas, Kristi Andrasik, Elizabeth Bonham, “Who is a Nuisance? Criminal Activity Nuisance Ordinances in Ohio,” (November 8, 2017), 4-6. Available at: <https://ssrn.com/abstract=3067028> (accessed November 14, 2017).

¹³ Priscilla Ocen, “The New Racially Restrictive Covenant: Race, Welfare, and the Policing of Black Women in Subsidized Housing,” *UCLA Law Review* vol. 59 no. 6 (2012), 1576-1579.

¹⁴ Margery Austin Turner, et al, *Housing Discrimination Against Racial and Ethnic Minorities 2012*, The Urban Institute, (June, 2013), 40.

The methodology for this estimate was developed by John Simonson. The explanation is available at: Michael Lepley and Lenore Mangiarelli, “The State of Fair Housing in Northeast Ohio,” Housing Research & Advocacy Center (April 2017), 65. Available at <http://www.thehousingcenter.org/wp-content/uploads/2017/04/SOFH-2017-Final.pdf>

¹⁵ Michael Lepley and Lenore Mangiarelli, “The State of Fair Housing in Northeast Ohio,” Housing Research & Advocacy Center (April 2017), 26.

¹⁶ J. Rosie Tighe, Megan E. Hatch, and Joseph Mead, “Source of Income Discrimination and Fair Housing Policy,” *Journal of Planning Literature* vol. 32 (2017), 3-15.

¹⁷ Cuyahoga Metropolitan Housing Authority, *Tenant Demographics Summary*, January 2016. Available at: <https://www.cmha.net/aboutus/docs/DemogSumPHHCVP.pdf>

¹⁸ Cuyahoga Metropolitan Housing Authority, *Demographics as of January 2, 2017: Housing Choice Voucher Program*, January 2016. Available at: <https://www.cmha.net/aboutus/docs/DemogRptHCVP.pdf>

large urban area in the United States, and HCVP households in Cuyahoga County have been shown to cluster in majority-minority neighborhoods (see Figure 1).¹⁹

Fourteen states and dozens of local jurisdictions have legislation addressing source of income discrimination to varying degrees, including SOI discrimination as a protected class in the state fair housing law.²⁰ While the State of Ohio does not include source protections of income in its fair housing law, there are four municipalities in Cuyahoga County that do include source of income protections.²¹ An SOI antidiscrimination law would allow the HCVP to achieve its goals of mobility by eliminating the landlords' ability to deny housing based on voucher status and thereby increase the likelihood that the voucher holder could find a home in a desirable neighborhood.²² As people of color are overrepresented among HCVP participants, such SOI protections could be a mechanism for integrating neighborhoods.²³

Early research on the effect of SOI antidiscrimination laws and the likelihood of voucher holders moving to areas of higher-opportunity is positive. Voucher utilization rates increased by twelve percentage points in areas with SOI protections.²⁴ SOI protections appear to have a moderately positive effect on neighborhood quality; one study showed that voucher holders living in areas with SOI antidiscrimination laws were more likely to move to lower-poverty, less racially segregated neighborhoods than their counterparts living in areas without SOI protections.²⁵

¹⁹ Population Studies Center, "New Racial Segregation Measures for Large Metropolitan Areas: Analysis of the 1990-2010 Decennial Census," University of Michigan: <http://www.psc.isr.umich.edu/dis/census/segregation2010.html> (accessed July 29, 2017).

²⁰ Poverty & Race Research Action Council, *Expanding Choice: Practical Strategies for Building a Successful Housing Mobility Program: APPENDIX B: State, Local and Federal Laws Barring Source-of-Income Discrimination*, (updated May, 2017) <http://www.prrac.org/pdf/AppendixB.pdf> (accessed June 6, 2017).

²¹ Municipalities with legislation that addresses source of income discrimination in Cuyahoga County include: Linndale, South Euclid, University Heights, and Warrensville Heights. See: Michael Lepley and Lenore Mangiarelli, "The State of Fair Housing in Northeast Ohio," Housing Research & Advocacy Center (April 2017).

²² Tamica H. Daniel, "Bringing Real Choice to the Housing Choice Voucher Program: Addressing Voucher Discrimination under the Federal Fair Housing Act," *Georgetown Law Journal* (2009), 98: 769.

²³ Paula Beck, "Fighting Section 8 Discrimination: The Fair Housing Act's New Frontier," *Harvard Civil Rights-Civil Liberties Review* (1996), 31: 155-86.

Kim Johnson-Spratta, "Housing Discrimination and Source of Income: A Tenant's Losing Battle," *Indiana Law Review* (1998), 32: 457-80.

Lisa M. Krzewinski, "Section 8's Failure to Integrate: The Interaction of Class-Based and Racial Discrimination: As long as they don't move next door by Stephen Grant Meyer," *Boston College Third World Law Journal* (2001), 21: 315.

²⁴ M. Finkel and L. Burton, "Study on Section 8 Voucher Success Rates. Volume I. Quantitative Study of Success Rates in Metropolitan Areas," Prepared by Abt Associates for the U.S. Department of Housing and Urban Development, 2-3, (2001).

²⁵ Lance Freeman and Yunjing Li, "Do Source of Income Anti-Discrimination Laws Facilitate Access to Less Disadvantaged Neighborhoods?" *Journal of Planning Literature* (2014), 16: 359-78.

IV. TESTING PART ONE: VOUCHER DISCRIMINATION AS A PROXY FOR RACE

Testing is a technique used to directly observe and investigate the practices of housing providers to detect housing discrimination. Testers pose as individuals seeking housing and engage housing providers in the process of acquiring housing or services related to acquiring housing. A test coordinator selects sites to test and gives testers a specific profile that defines their household, their income, and other characteristics as needed for the test. For the purposes of this study, The Housing Center utilized two testing strategies: *matched-pair testing* and single testers with a wraparound tester when needed (specific testing methodologies are described below).

Tests are either *systemic* or *complaint-based*. Systemic testing is an investigative technique that examines institutional discrimination in a particular housing market. During systemic testing, a test coordinator randomly selects a set number of housing units in an area for testing. Systemic testing provides an estimation of the amount of discrimination occurring in a given area. Systemic tests that detect housing discrimination can serve as a basis for fair housing complaints. Complaint-based testing is a targeted investigation of a specific housing provider based on reported acts of housing discrimination. During a complaint-based test, a test coordinator will design the test around the protected class of the alleged victim of housing discrimination. For this report, all tests carried out were systemic tests.

A. Testing Methodology

Fair housing professionals have long assumed that the refusal to accept housing vouchers could serve as a legal proxy for illegal forms of housing discrimination based on race, family status, or other protected classes. If this is true, testing should uncover discrimination and show the discriminatory intent of housing providers who refuse to accept vouchers. The Housing Center examined whether housing providers who advertise the denial of housing vouchers commit race-based, housing discrimination against African Americans at a higher rate than housing providers who do not mention housing vouchers in their advertising as an estimation of the motivation of the former group to discriminate on the basis of race.

1. Experiment Group Selection: Race-Based Discrimination by Housing Providers Advertising the Denial of Vouchers

The Housing Center test coordinators estimated the rate of housing discrimination against African Americans carried out by housing providers who advertise the denial of housing vouchers by completing 102 tests using the following methodology. Using the Craigslist RSS (Rich Site Summary) feed with the internet-based, task automator IFTTT (If This Then That), test coordinators collected the date posted, the hyperlink, and a sample of text from all Craigslist rental ads posted in the Cleveland-area market containing the following words or phrases:

- “section 8”
- “section eight”
- “sec 8”
- “voucher”
- “CMHA”
- “EDEN”
- “government”²⁶

Ads containing the above phrases, for a given seven-day period, were collected into a Google Docs spreadsheet; each ad was then assigned a random number using Microsoft Excel’s RAND() function. Test coordinators also collected location data, when available, from the Craigslist mapping feature. Test

²⁶ In 2016, 76.5% of the respondents participating in a voucher program in Cuyahoga County reported that they use Craigslist to find an apartment. See: Lenore Healy & Michael Lepley, “Housing Voucher Mobility in Cuyahoga County,” Housing Research & Advocacy Center (February 2016), 41.

coordinators sorted the list of ads from smallest to largest using the randomly assigned number and selected ads for testing, in order by assigned number, when they met the following criteria:

- Units were advertised as unavailable to housing voucher program participants.
- Ads provided an email address for inquiries.

2. Control Group Selection: Race-Based Discrimination by Housing Providers

The Housing Center test coordinators estimated the rate of race-based housing discrimination carried out by housing providers who do not advertise a preference for accepting or denying housing choice vouchers by completing 105 tests using the following methodology. Test coordinators collected the date posted, the hyperlink, and a sample of text from all Craigslist rental ads posted in the Cleveland-area market into a Google Docs spreadsheet using the Craigslist RSS feed with the internet-based, task automator IFTTT and assigned the ads a random number using Microsoft Excel's RAND() function. Test coordinators also collected location data, when available, from the Craigslist mapping feature. Test coordinators sorted the list of ads from smallest to largest using the randomly assigned number and selected ads for testing, in order by assigned number, when they met the following criteria:

- Units were advertised with no stated preference for or against housing voucher program participants.
- Ads provided an email address for inquiries.

3. Testing Strategy

Test coordinators set up free email accounts using unambiguously-gendered, racially-identifiable names. Test coordinators then conducted matched-pair, race tests for the advertised units via email. In a matched-pair test, a test coordinator selects two testers with similar characteristics except for a specific trait (class) that may elicit discriminatory treatment from a housing provider. Test coordinators used the following profiles: single, African American female; single, African American male. The African American profiles were paired with the following white profiles, respectively: single, white female; single, white male.

Test coordinators made the first inquiry with the African American tester, attempting to schedule a time to see a unit. They followed up with an inquiry from the white tester within 24 hours. Test coordinators analyzed the results to determine if the housing provider engaged in unfavorable treatment on the basis of race. For the purposes of this study, the test coordinator gives the test one of the following results: "same treatment" or "unfavorable treatment."

In tests that resulted in unfavorable treatment:

- The housing provider denied housing to one tester by not responding to one tester or by offering it to one tester and not the other by telling them it was unavailable.
- The housing provider responded to the white tester before the African American tester, even though the African American tester made the first inquiry.
- The housing provider offered one tester lower rent or other financial incentives than the other tester.
- The housing provider made a greater perceived effort to promote the property to one tester and not the other or offered more information to one tester and not the other.

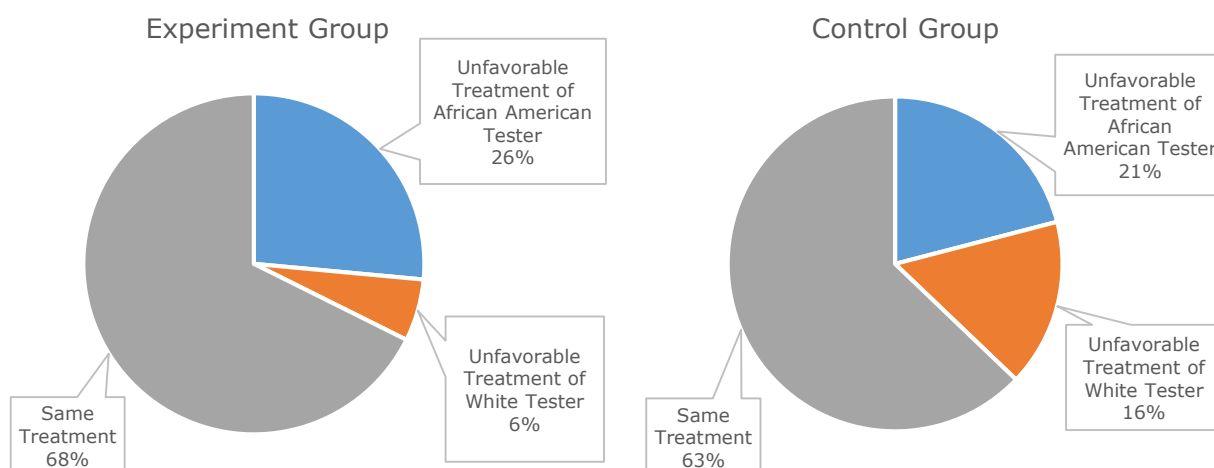
Tests where neither tester received a response were considered inconclusive and excluded from the analysis.

B. Voucher Discrimination as a Proxy for Race

The experiment group of housing providers advertised the denial of housing vouchers. The control group did not mention housing vouchers in their ads. Both groups were tested using matched-pair race tests with an African American tester and a white tester. Neither of the testers in the experiment group nor in the control group mention the use of a housing voucher during the test (see methodology above).

The African American tester in the experiment group experienced unfavorable treatment in 26.4% of tests (27 out of 102 tests) and the white tester in 5.8% of tests (6 out of 102 tests; see Figure 6 and Table 2). The African American tester in the control group experienced unfavorable treatment 20.9% of the time (22 out of 105 tests) and the white tester 16.1% of the time (17 out of 105 see Figure 6 and Table 3). Housing providers in the experiment group seem to be responding to housing inquiries based on the race of the testers, evidenced by the more than 20% difference in unfavorable treatment between African American and white testers. Housing providers in the experiment group discriminated against the African American tester 5.5% more often than the control group. Due to the differences in rates of discrimination, it is likely that some housing providers are refusing to accept housing vouchers as a legal way to deny housing to African Americans.

Figure 6: Results of Part One Experiment Group and Control Group Tests



C. Race-Based Housing Discrimination in General

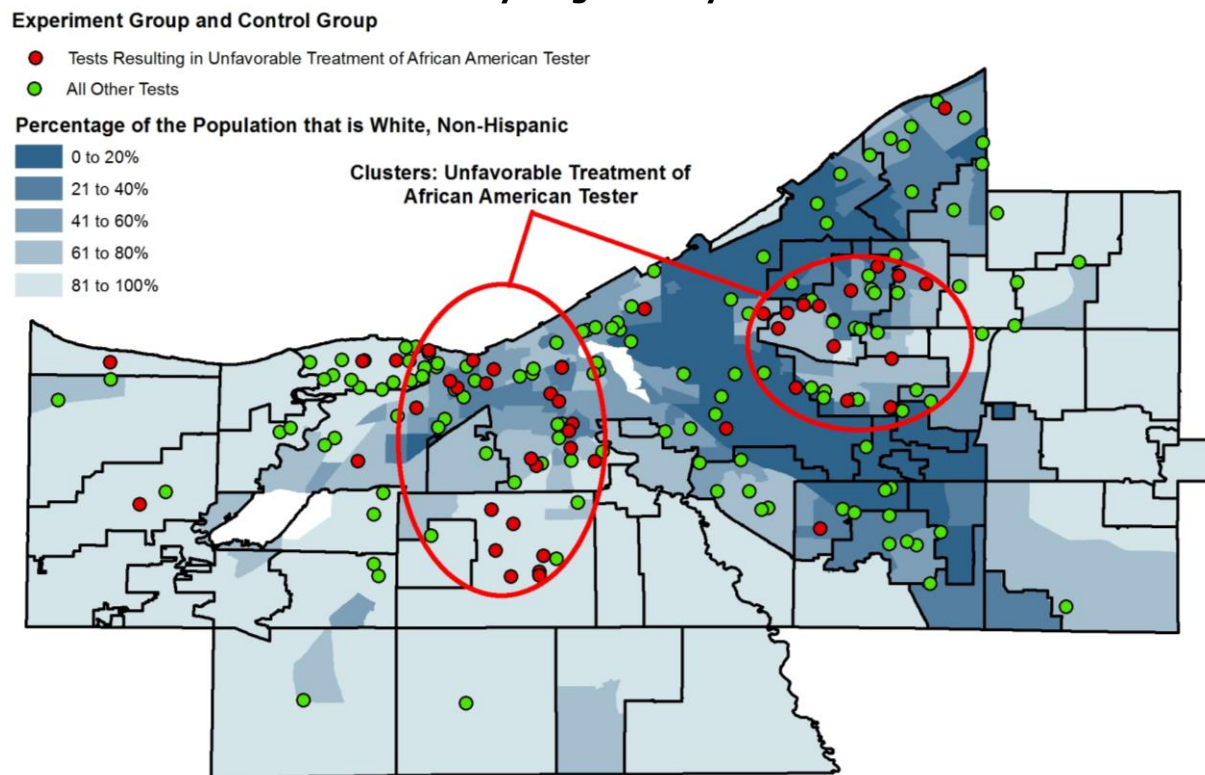
The locations of both the experiment and control group tests are similarly distributed across Cuyahoga County and correspond to the distribution of rental units (see Figures 12 and 13). When both groups are combined, patterns of racial discrimination emerge. Tests that resulted in unfavorable treatment against the African American tester are clustered in two areas in Cuyahoga County. The first cluster includes the areas of the west-side of Cleveland and Parma. The second cluster includes the suburbs Cleveland Heights, Shaker Heights, and South Euclid (see Figure 7). Both areas are similar in that they border areas of Cuyahoga County where most African Americans live: the east-side of Cleveland, East Cleveland, Euclid, and the southeast suburbs.

Overall, the African American tester experienced unfavorable treatment 12.5% (49 out of 207 tests) more often than the white tester (23 out of 207 tests; see Figure 8), but the nature of that treatment was very different. Both white and African American testers experienced ignoring as a form of unfavorable treatment.²⁷ African American testers were also told units were not available while the white tester was

²⁷ The white, female testers experienced unfavorable treatment in 17.2% of tests using a female matched-pair while the white male testers experienced unfavorable treatment in only 3.9% of tests using male matched-pair. African

offered times to view the unit, given less information than the white tester, vetted more stringently than the white tester, or received responses from the housing provider much later than the white tester (the African American tester made the first inquiry in every test). In some tests, the first response received by the African American tester was analogous to “we don’t accept vouchers” showing that some housing providers associate African Americans with HCV in Cuyahoga County (no tester mentioned a voucher in this series of tests). The white tester did not experience these forms of treatment in any test. It is possible that ignoring in some tests by the housing providers was unintentional, but retests showed that it was an intentional strategy of race-based discrimination employed by some housing providers against African Americans (results of retests not included in analysis).

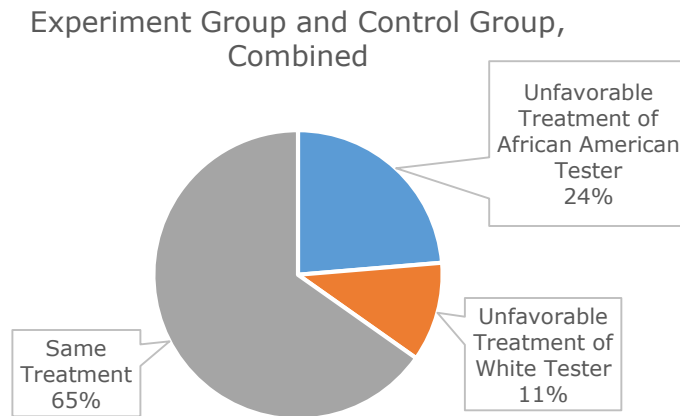
Figure 7: Location of Part One Tests Resulting in Unfavorable Treatment of African American Testers and Race in Cuyahoga County



(Source: 2015 American Community Survey 5-Year Estimates)

American female and African American male testers experienced unfavorable treatment in 22.7% of tests using female matched-pairs and 25.7% of tests using male matched-pairs, respectively (See Table 2 and Table 3).

Figure 8: Results of Part One Experiment Group and Control Group Tests, Combined



V. TESTING PART TWO: VOUCHER DISCRIMINATION AND ITS EFFECT ON SEGREGATION

In Cuyahoga County, the majority of housing voucher program households live in areas with high rates of poverty, high rates of exposure to environmental health hazards, and low educational outcomes. The Housing Center estimated the rate at which housing providers denied HCVP participants units in Cuyahoga County outside of areas with high concentrations of voucher-using households by completing 101 one-part or two-part tests with the below methodology.

A. Testing Methodology

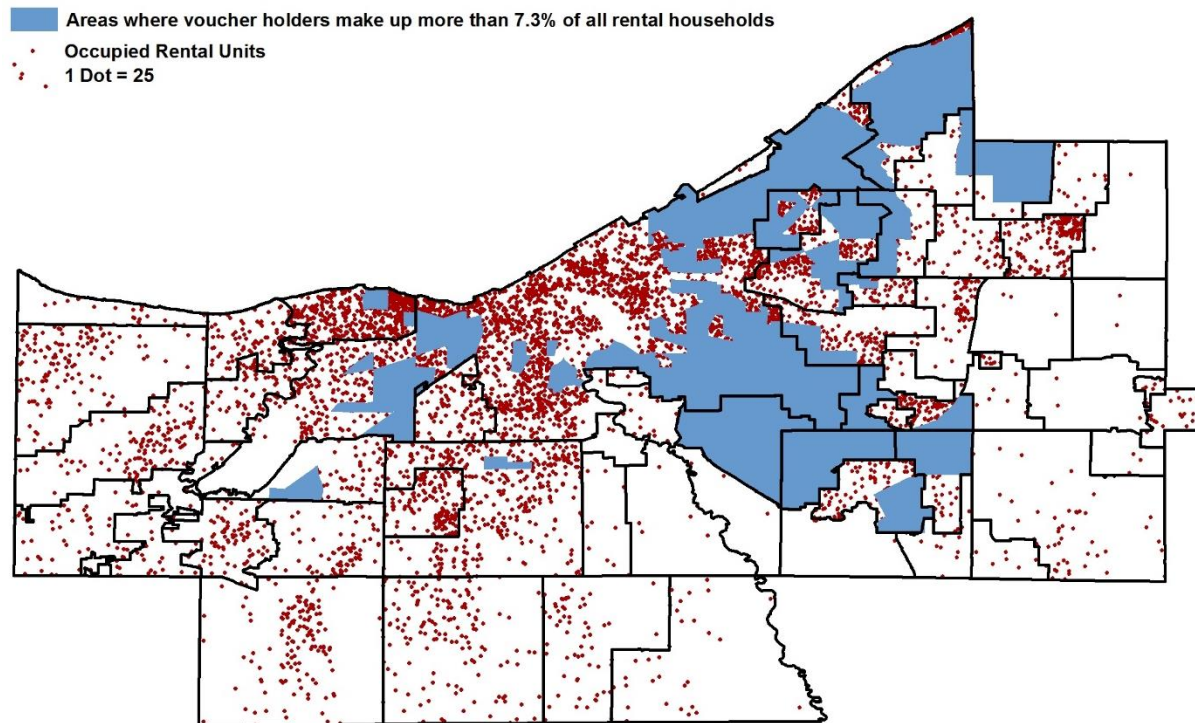
Test coordinators collected the date posted, the hyperlink, and a sample of text from all Craigslist rental ads posted in the Cleveland-area market for a given seven-day period into a Google Docs spreadsheet using the Craigslist RSS feed with the internet-based, task automator IFTTT. The test coordinators assigned the ads a random number using Microsoft Excel's RAND() function, and sorted the list of ads from smallest to largest using the randomly assigned number. Test coordinators selected ads for testing, in order by assigned number, when they met the following criteria:

- Units were advertised as having two or three bedrooms, the most common unit sizes for CMHA voucher participants.²⁸
- Units had rents within range of CMHA's payment standard (see Table 1).
- Ads utilized the Craigslist mapping feature, from which test coordinators extracted the approximate latitude and longitude for the given unit.
- Units were located inside of a target area, or census tracts without concentrations of housing vouchers (see Figure 9). A census tract was determined to have a concentration of housing vouchers if households using a housing voucher in that tract exceeded 7.3% of all occupied rental units in that tract.²⁹
- Ads did not state whether a housing subsidy was accepted or was not accepted.
- Ads provided an email address for inquiries.

²⁸ Two-bedroom and three-bedroom units make up 34.9% and 33.1%, respectively, of the total housing voucher contracts issued by CMHA. See: Cuyahoga Metropolitan Housing Authority, "Housing Choice Voucher Program." Available at: <https://www.cmha.net/hcvp/index.aspx> (accessed June 14, 2017)

²⁹ A census tract was determined to have a concentration of vouchers if the percentage of vouchers per occupied rental units in a given tract exceeded the percentage of all vouchers in Cuyahoga County per all occupied rental units in Cuyahoga County. In a statistically integrated region, every census tract would have the same percentage of housing vouchers per occupied rental units as the total population. Housing voucher concentration (greater than 7.3%) was found using the HUD's "A Picture of Subsidized Housing" 2015 estimate for all vouchers in Cuyahoga County (15,960) as a percentage of the 2015 American Community Survey 5-Year Estimate for all occupied rental units in Cuyahoga County (217,409).

Figure 9: Occupied Rental Households and Housing Vouchers as a Percentage of All Renters in Cuyahoga County by Census Tract, 2015



(Source: HUD, A Picture of Subsidized Housing, 2015; 2015 American Community Survey 5-Year Estimates)

Test coordinators first made an inquiry into the selected ads using the following profile representing a typical household using a housing voucher from CMHA: unmarried African American female with one or two children (depending on unit size), using a housing choice voucher from CMHA.³⁰ The initial email asked if the housing provider accepts a “CMHA voucher.” An affirmative or negative response to the initial email was considered a conclusive result.

In the event that there was no response to the initial email, test coordinators sent a follow-up inquiry from the following profile to test if the initial email was being ignored by the housing provider: unmarried, white female with one or two children (depending on unit size), not using a housing choice voucher. Any response to the follow-up email was considered a conclusive result (evidence of denial of the unit to the first tester). Inconclusive tests were considered incomplete and removed from the analysis.

³⁰ In 2016, CMHA voucher program participants were 89.6% African American, 82.5% had female heads of household, 35.9% of all households had children under 18, and an average household size of 2.3. See: Cuyahoga Metropolitan Housing Authority, “Demographics as of January 2, 2016: Housing Voucher Program.” Available at <https://www.cmha.net/aboutus/docs/DemogRptHCVP.pdf> (accessed June 14, 2017)

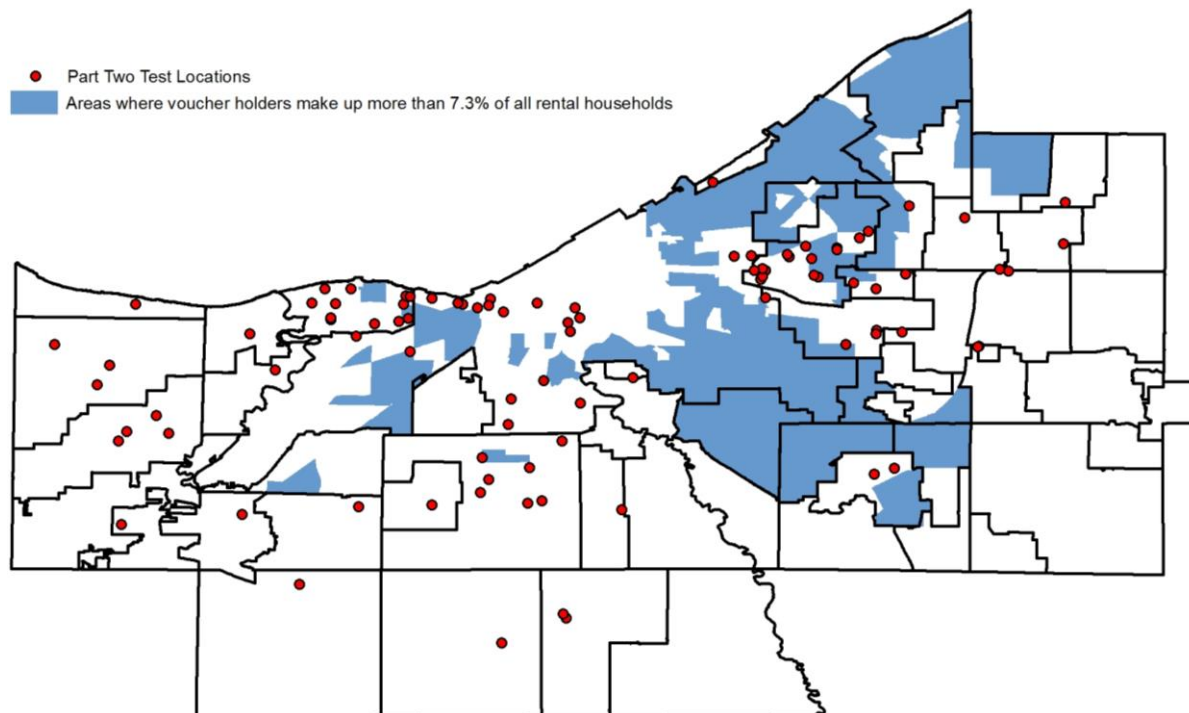
B. Testing Part Two Analysis: Discriminatory Effect on the Basis of Race

The Part Two portion of testing seeks to document the experience of a typical HCVP participant in Cuyahoga County attempting to move to an area where housing vouchers are not concentrated. Housing providers in this series of tests are advertising 2 or 3 bedroom units outside of areas of concentrated housing vouchers (see Figure 10), that are affordable to a person using a CMHA housing voucher, and they did not mention housing vouchers in their ads. They received an inquiry from an unmarried African American woman with children, claiming to use a housing voucher. If the African American tester did not receive a response, the housing provider received a second inquiry from a white tester with children not mentioning a housing voucher (see methodology above).

Three categories were used to delineate unfavorable treatment in the testing process: denied, ignored, and accepted. The denied category is defined by a reply from a housing provider that they do not take housing vouchers. The denials were direct denials stating that they do not take the housing voucher; the denial category includes an instance in which the African American tester with the voucher was told the home was rented and one day later, the white tester was invited to schedule an appointment to view the home. The ignored category is defined by an African American tester with a housing voucher receiving no reply to the inquiry, but the white tester did receive a reply. Tests in which both testers were ignored were not included in the analysis. The accepted category is defined by a housing provider responding that they do take vouchers.

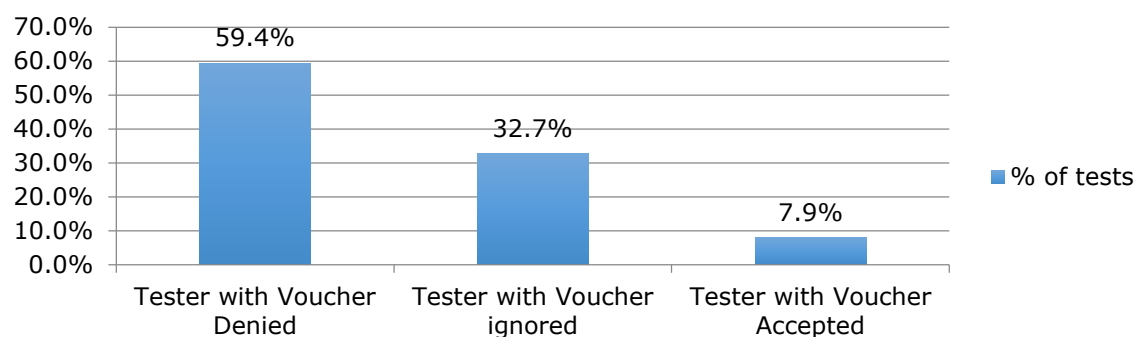
The African American tester using a voucher was denied housing or ignored by the housing provider in the target area 91.2% of the time (see Table 4). In instances in which the African American tester using a housing voucher was specifically ignored, the white tester with no voucher got a response 32.7% of the time (see Figure 11).

Figure 10: Location of Part Two Tests and Housing Vouchers as a Percentage of All Renters in Cuyahoga County by Census Tract in 2015



(Source: HUD, A Picture of Subsidized Housing, 2015; 2015 American Community Survey 5-Year Estimates)

Figure 11: Part Two Testing Results



The federal Fair Housing Act prohibits housing discrimination on a number of bases, including race. Prohibited discrimination may take the form of disparate treatment; such as when a housing provider refuses to rent to someone because of their race, sex, disability, etc. It can also take the form of disparate impact, such as when a housing provider has a facially neutral policy that disproportionately impacts a group of persons on the basis of a protected trait under the Fair Housing Act. Using disparate impact analysis, the act of refusing to accept a voucher in Cuyahoga County may violate the Fair Housing Act on the basis of race regardless of the intent of the housing provider to discriminate based on race. In a disparate impact claim “liability may be established under the Fair Housing Act based on a practice’s discriminatory effect . . . even if the practice was not motivated by a discriminatory intent.”³¹ HUD issued a framework for establishing liability under a disparate impact analysis. HUD’s rule, “Implementation of the Fair Housing Act’s Discriminatory Effects Standard,” states that:

“a practice has a discriminatory effect where it actually or predictably results in a disparate impact on a group of persons or creates, increases, reinforces, or perpetuates segregated housing patterns because of race, color, religion, sex, handicap, familial status, or national origin.”³²

In Cuyahoga County, the practice of refusing to accept a housing voucher is a discriminatory action on the basis of race and perpetuates racial segregation. In Cuyahoga County, 89.6% of voucher program participants are African American, meaning a housing provider that denies housing to a voucher program participant is denying housing to an African American 9 times out of 10. In Cuyahoga County, most voucher program participants are clustered in majority African American neighborhoods. Approximately 10,616 households using vouchers (two-thirds) lived in a census tract where the population was greater than 50% African American in 2015 (in 2015, 29.6% of the total population of Cuyahoga County was African American; see Figure 14), but many have reported that they would move outside those neighborhoods if units were available to them.³³ The most reported difficulty in obtaining housing, by voucher program participants, is that housing providers refuse to accept vouchers (reported by 79.3% of survey respondents, see Figure 3), and testing outside of areas with concentrated housing vouchers showed that housing providers refuse to accept vouchers 92.1% of the time. Housing providers refusing to accept housing vouchers maintain racially-segregated living patterns in Cuyahoga County and prevent Cuyahoga County from becoming a diverse, integrated community.

³¹ U.S. Department of Housing and Urban Development, “Implementation of the Fair Housing Act’s Discriminatory Effects Standard; Final Rule,” *Federal Register* Vol. 78, No. 32 (February 15, 2013), 11482. 24 CFR § 100.500.

³² *Ibid.*, 11482. 24 CFR § 100.500(a).

³³ U.S. Department of Housing and Urban Development, “A Picture of Subsidized Housing,” 2015. U.S. Census Bureau, Race, 2011-2015 American Community Survey 5-Year Estimates. Lenore Healy & Michael Lepley, “Housing Voucher Mobility in Cuyahoga County,” Housing Research & Advocacy Center (February 2016), 40-42.

VI. CONCLUSIONS AND RECOMMENDATIONS

Regardless of the motivating factor, housing providers in Cuyahoga County maintain racial segregation by refusing to accept Housing Choice Vouchers. This research indicates that race is a motivating factor for some, who may be refusing to accept a voucher as a proxy for race-based housing discrimination. In Cuyahoga County, one-and-two-part testing shows that housing providers renting properties in census tracts that do not have a concentration of housing vouchers deny HCVP participant a unit more than 90% of the time. Race-based, matched-pair testing shows that housing providers who advertise the refusal to accept Housing Choice Vouchers (“No Section 8”), in Cuyahoga County, are more likely to treat an African American renter unfavorably compared to a white renter than those who do not mention vouchers in their ads for rental units. The Housing Center recommends:

- **Cuyahoga County pass legislation prohibiting housing voucher discrimination throughout Cuyahoga County by implementing a county-wide, fair housing law that includes Source of Income as a protected class.**
- **All public housing authorities inform all HCVP participants of their fair housing rights.**

As highlighted previously in the Mobility Report, programmatic inefficiencies and negative perceptions of the HCVP discourage many housing providers from participating in the HCVP in high-opportunity neighborhoods in Cuyahoga County. Low rent determinations and the high costs of moving effectively price out HCVP participants.

- **Create a mobility counselling program that assists tenants in moving to high-opportunity neighborhoods. Such a program should recruit housing providers to participate in the HCVP, provide technical assistance to them to reduce inefficiencies in the program, financially incentivize them to rent to HCVP participants in high-opportunity neighborhoods.**
- **Provide security deposit assistance to HCVP participants moving to high-opportunity neighborhoods.**
- **Implement Small Area Fair Market Rent to variations in the local housing market.**

Appendix

Table 2: Part One Experiment Group Test Results³⁴

Test Number	City	Gender	Testing Result
1	Parma	F	Unfavorable Treatment of AA Tester
2	Cleveland (Ohio City)	F	Same Treatment
3	Cleveland (Slavic Village)	F	Same Treatment
4	Shaker Heights	F	Same Treatment
5	Cleveland (Brooklyn Centre)	F	Unfavorable Treatment of AA Tester
6	Cleveland (Cudell)	F	Same Treatment
7	Cleveland (Lee-Harvard)	F	Same Treatment
8	Cleveland Heights	F	Unfavorable Treatment of White Tester
9	Lakewood	F	Same Treatment
10	Richmond Heights	F	Same Treatment
11	Euclid	F	Same Treatment
12	Cleveland Heights	F	Same Treatment
13	Cleveland (Old Brooklyn)	F	Same Treatment
14	University Heights	F	Same Treatment
15	Cleveland (Brooklyn Centre)	F	Same Treatment
16	Lakewood	F	Unfavorable Treatment of AA Tester
17	Cleveland Heights	F	Unfavorable Treatment of AA Tester
18	Lakewood	F	Same Treatment
19	Garfield Heights	F	Same Treatment
20	Cleveland (West Boulevard)	F	Same Treatment
21	Cleveland (Old Brooklyn)	F	Same Treatment
22	Cleveland (Brooklyn Centre)	F	Same Treatment
23	Lakewood	F	Same Treatment
24	University Heights	F	Same Treatment
25	Parma	F	Unfavorable Treatment of AA Tester
26	Maple Heights	F	Same Treatment
27	Cleveland (West Boulevard)	F	Unfavorable Treatment of White Tester
28	Middleburg Heights	F	Same Treatment
29	Cleveland (Clark-Fulton)	F	Unfavorable Treatment of AA Tester
30	Cleveland Heights	F	Unfavorable Treatment of AA Tester
31	Shaker Heights	F	Unfavorable Treatment of AA Tester
32	Maple Heights	F	Same Treatment
33	Cleveland (Union Miles)	F	Unfavorable Treatment of AA Tester
34	Cleveland (Jefferson)	F	Unfavorable Treatment of AA Tester
35	Cleveland Heights	F	Same Treatment
36	Cleveland (West Boulevard)	F	Same Treatment
37	Cleveland (Cudell)	F	Same Treatment
38	Cleveland (Edgewater)	F	Unfavorable Treatment of AA Tester
39	Maple Heights	F	Unfavorable Treatment of White Tester
40	Cleveland (Collinwood-Nottingham)	F	Unfavorable Treatment of White Tester
41	Cleveland (Brooklyn Centre)	F	Same Treatment
42	Mayfield Heights	F	Same Treatment
43	Cleveland (Glenville)	F	Same Treatment
44	Cleveland (Detroit Shoreway)	F	Unfavorable Treatment of AA Tester
45	Garfield Heights	F	Same Treatment
46	Garfield Heights	F	Same Treatment
47	Garfield Heights	F	Same Treatment
48	Euclid	F	Same Treatment
49	Lakewood	F	Same Treatment

³⁴ Location data that could be used to identify housing providers not included.

50	Cleveland Heights	F	Same Treatment
51	Parma	F	Unfavorable Treatment of AA Tester
52	Shaker Heights	M	Same Treatment
53	Cleveland West Boulevard)	M	Same Treatment
54	Cleveland (Old Brooklyn)	M	Same Treatment
55	Cleveland (Bellaire-Puritas)	M	Unfavorable Treatment of AA Tester
56	Euclid	M	Unfavorable Treatment of AA Tester
57	Shaker Heights	M	Unfavorable Treatment of AA Tester
58	Fairview Park	M	Same Treatment
59	Cleveland (Collinwood-Nottingham)	M	Same Treatment
60	Cleveland (Union Miles)	M	Same Treatment
61	Cleveland (Detroit Shoreway)	M	Same Treatment
62	Cleveland Heights	M	Unfavorable Treatment of AA Tester
63	Cleveland (Ohio City)	M	Same Treatment
64	Cleveland (Detroit Shoreway)	M	Unfavorable Treatment of AA Tester
65	Cleveland Heights	M	Unfavorable Treatment of AA Tester
66	Cleveland (Edgewater)	M	Same Treatment
67	Beachwood	M	Same Treatment
68	Lakewood	M	Same Treatment
69	Cleveland (Kinsman)	M	Same Treatment
70	Cleveland (Buckeye-Shaker Square)	M	Same Treatment
71	Cleveland (Brooklyn Centre)	M	Same Treatment
72	South Euclid	M	Same Treatment
73	Cleveland Heights	M	Same Treatment
74	Lakewood	M	Same Treatment
75	Shaker Heights	M	Same Treatment
76	Bedford	M	Same Treatment
77	Maple Heights	M	Unfavorable Treatment of White Tester
78	Cleveland (Old Brooklyn)	M	Unfavorable Treatment of AA Tester
79	Cleveland (Cudell)	M	Unfavorable Treatment of AA Tester
80	Lyndhurst	M	Same Treatment
81	Cleveland Heights	M	Same Treatment
82	South Euclid	M	Unfavorable Treatment of AA Tester
83	South Euclid	M	Same Treatment
84	Cleveland Heights	M	Same Treatment
85	Bedford Heights	M	Same Treatment
86	Lyndhurst	M	Same Treatment
87	Lakewood	M	Same Treatment
88	Cleveland Heights	M	Same Treatment
89	Maple Heights	M	Same Treatment
90	Lakewood	M	Same Treatment
91	Cleveland (Buckeye-Woodhill)	M	Same Treatment
92	Cleveland (Jefferson)	M	Same Treatment
93	Cleveland Heights	M	Same Treatment
94	Euclid	M	Unfavorable Treatment of White Tester
95	Cleveland (Old Brooklyn)	M	Same Treatment
96	Cleveland (Clark-Fulton)	M	Unfavorable Treatment of AA Tester
97	South Euclid	M	Unfavorable Treatment of AA Tester
98	Shaker Heights	M	Unfavorable Treatment of AA Tester
99	Lakewood	M	Same Treatment
100	Cleveland (Brooklyn Centre)	M	Unfavorable Treatment of AA Tester
101	Euclid	M	Same Treatment
102	Cleveland (Cudell)	M	Unfavorable Treatment of AA Tester

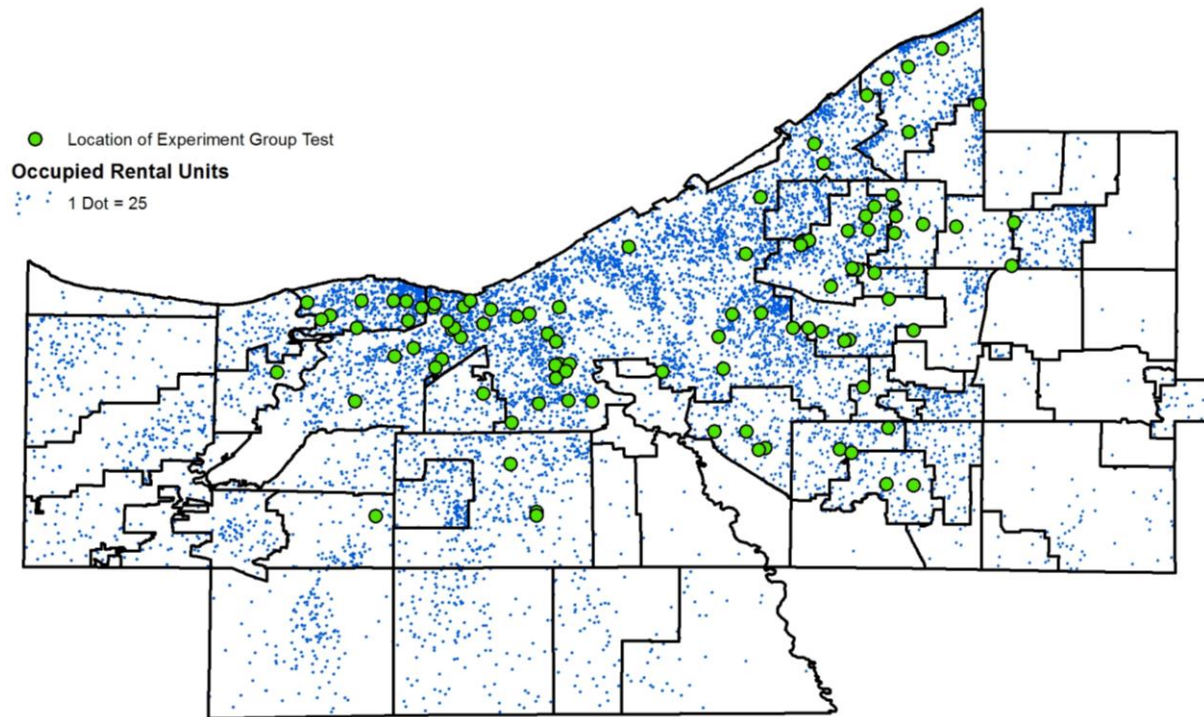
Table 3: Part One Control Group Test Results³⁵

Test Number	City	Gender	Testing Result
1	Cleveland Heights	F	Unfavorable Treatment of White Tester
2	Cleveland Heights	F	Unfavorable Treatment of AA Tester
3	Shaker Heights	F	Same Treatment
4	Lakewood	F	Same Treatment
5	Euclid	F	Unfavorable Treatment of White Tester
6	Lakewood	F	Same Treatment
7	Cleveland (Tremont)	F	Same Treatment
8	Lakewood	F	Same Treatment
9	Parma	F	Same Treatment
10	Solon	F	Same Treatment
11	Lakewood	F	Same Treatment
12	Cleveland (Downtown)	F	Same Treatment
13	North Olmsted	F	Same Treatment
14	Lakewood	F	Same Treatment
15	Cleveland (Kamm's)	F	Same Treatment
16	Parma	F	Unfavorable Treatment of AA Tester
17	Cleveland (Tremont)	F	Same Treatment
18	Bedford	F	Unfavorable Treatment of White Tester
19	Parma	F	Unfavorable Treatment of AA Tester
20	Cleveland (University)	F	Unfavorable Treatment of AA Tester
21	Cleveland (Goodrich-Kirtland)	F	Unfavorable Treatment of AA Tester
22	Garfield Heights	F	Same Treatment
23	Lakewood	F	Unfavorable Treatment of AA Tester
24	Cleveland (Downtown)	F	Same Treatment
25	Cleveland (North Shore Collinwood)	F	Same Treatment
26	Cleveland Heights	F	Unfavorable Treatment of AA Tester
27	Maple Heights	F	Unfavorable Treatment of AA Tester
28	Lakewood	F	Unfavorable Treatment of AA Tester
29	Beachwood	F	Same Treatment
30	Cleveland (Old Brooklyn)	F	Same Treatment
31	Parma	F	Unfavorable Treatment of AA Tester
32	Lakewood	F	Unfavorable Treatment of White Tester
33	Cleveland Heights	F	Same Treatment
34	East Cleveland	F	Unfavorable Treatment of White Tester
35	Shaker Heights	F	Same Treatment
36	Parma	F	Unfavorable Treatment of AA Tester
37	Cleveland (Mount Pleasant)	F	Unfavorable Treatment of White Tester
38	Cleveland (Union-Miles)	F	Unfavorable Treatment of White Tester
39	Mayfield Village	F	Same Treatment
40	Cleveland (North Shore Collinwood)	F	Same Treatment
41	Cleveland (Broadway-Slavic Village)	F	Unfavorable Treatment of White Tester
42	Cleveland Heights	F	Unfavorable Treatment of White Tester
43	Parma	F	Unfavorable Treatment of White Tester
44	Fairview Park	F	Unfavorable Treatment of White Tester
45	East Cleveland	F	Unfavorable Treatment of White Tester
46	Bedford	F	Unfavorable Treatment of White Tester
47	Middleburg Heights	F	Same Treatment
48	Shaker Heights	F	Same Treatment
49	Cleveland (Cudell)	F	Same Treatment
50	Euclid	F	Unfavorable Treatment of White Tester
51	Lakewood	M	Unfavorable Treatment of AA Tester
52	Warrensville Heights	M	Same Treatment

³⁵ Location data that could be used to identify housing providers not included.

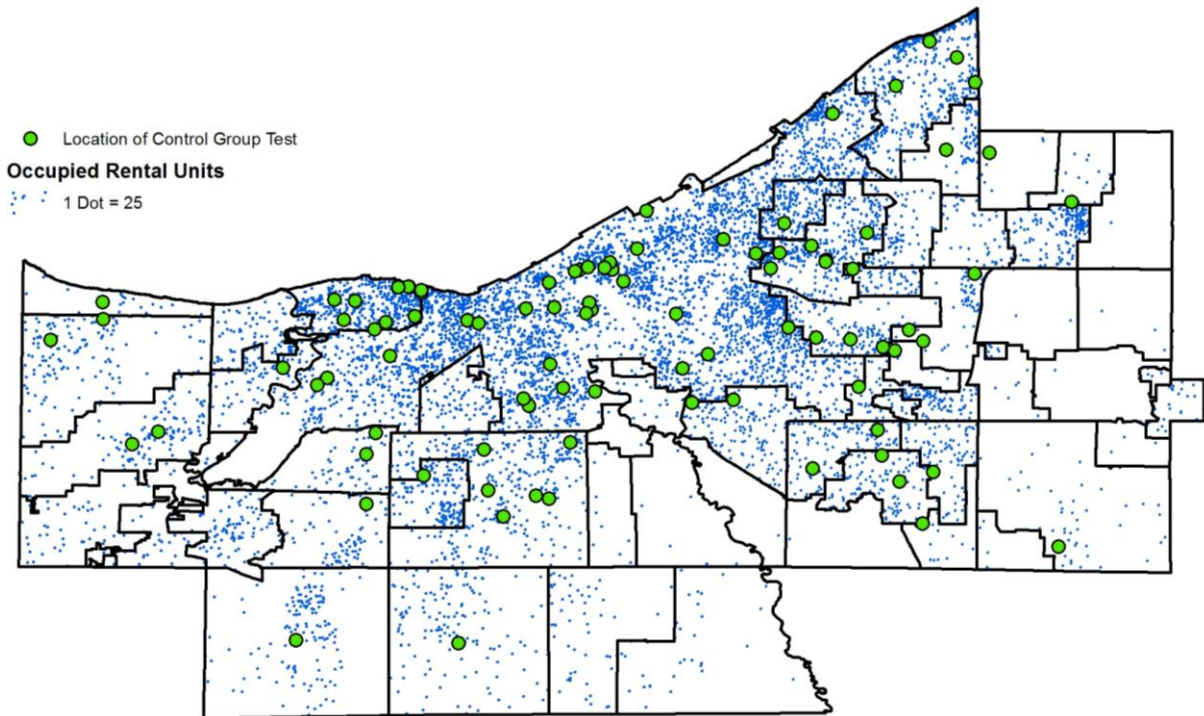
53	Shaker Heights	M	Unfavorable Treatment of AA Tester
54	Cleveland (Old Brooklyn)	M	Unfavorable Treatment of AA Tester
55	Bedford Heights	M	Same Treatment
56	Cleveland (Brooklyn Centre)	M	Same Treatment
57	Cleveland (Kamm's)	F	Same Treatment
58	Cleveland (Kinsman)	F	Same Treatment
59	Lakewood	F	Same Treatment
60	Cleveland (Broadway-Slavic Village)	F	Same Treatment
61	Cleveland (Downtown)	F	Same Treatment
62	Westlake	F	Unfavorable Treatment of White Tester
63	Cleveland (Detroit Shoreway)	F	Unfavorable Treatment of AA Tester
64	Cleveland Heights	M	Same Treatment
65	Cleveland Heights	M	Unfavorable Treatment of AA Tester
66	Cleveland (Old Brooklyn)	M	Unfavorable Treatment of AA Tester
67	Cleveland (Old Brooklyn)	M	Unfavorable Treatment of AA Tester
68	Euclid	M	Same Treatment
69	Parma	M	Same Treatment
70	Cleveland (Downtown)	M	Same Treatment
71	Cleveland (Goodrich-Kirtland)	M	Same Treatment
72	Parma Heights	M	Same Treatment
73	Shaker Heights	M	Unfavorable Treatment of AA Tester
74	Cleveland (Ohio City)	M	Same Treatment
75	Lakewood	M	Same Treatment
76	Brook Park	M	Same Treatment
77	Cleveland (Ohio City)	M	Unfavorable Treatment of AA Tester
78	Garfield Heights	M	Same Treatment
79	Cleveland (Downtown)	M	Same Treatment
80	Beachwood	M	Same Treatment
81	Bedford	M	Same Treatment
82	Bay Village	M	Unfavorable Treatment of AA Tester
83	Brook Park	M	Same Treatment
84	Cleveland (Cuyahoga Valley)	M	Same Treatment
85	Strongsville	M	Same Treatment
86	North Royalton	M	Same Treatment
87	Cleveland (Jefferson)	M	Same Treatment
88	Parma	M	Same Treatment
89	Richmond Heights	M	Same Treatment
90	Cleveland (Central)	M	Same Treatment
91	Lakewood	M	Same Treatment
92	Cleveland (Tremont)	M	Same Treatment
93	East Cleveland	M	Unfavorable Treatment of White Tester
94	Maple Heights	M	Same Treatment
95	Lakewood	M	Unfavorable Treatment of AA Tester
96	North Olmsted	M	Unfavorable Treatment of AA Tester
97	Shaker Heights	M	Same Treatment
98	Euclid	M	Same Treatment
99	Lakewood	M	Same Treatment
100	Westlake	M	Same Treatment
101	Lakewood	M	Unfavorable Treatment of White Tester
102	Cleveland (Ohio City)	M	Same Treatment
103	Mayfield Village	M	Same Treatment
104	Cleveland Heights	M	Same Treatment
105	Cleveland (Downtown)	M	Same Treatment

Figure 12: Location Part One of Experiment Tests



(Source: 2015 American Community Survey 5-Year Estimates)

Figure 13: Location Part One of Control Tests



(Source: 2015 American Community Survey 5-Year Estimates)

Table 4: Part Two Test Results³⁶

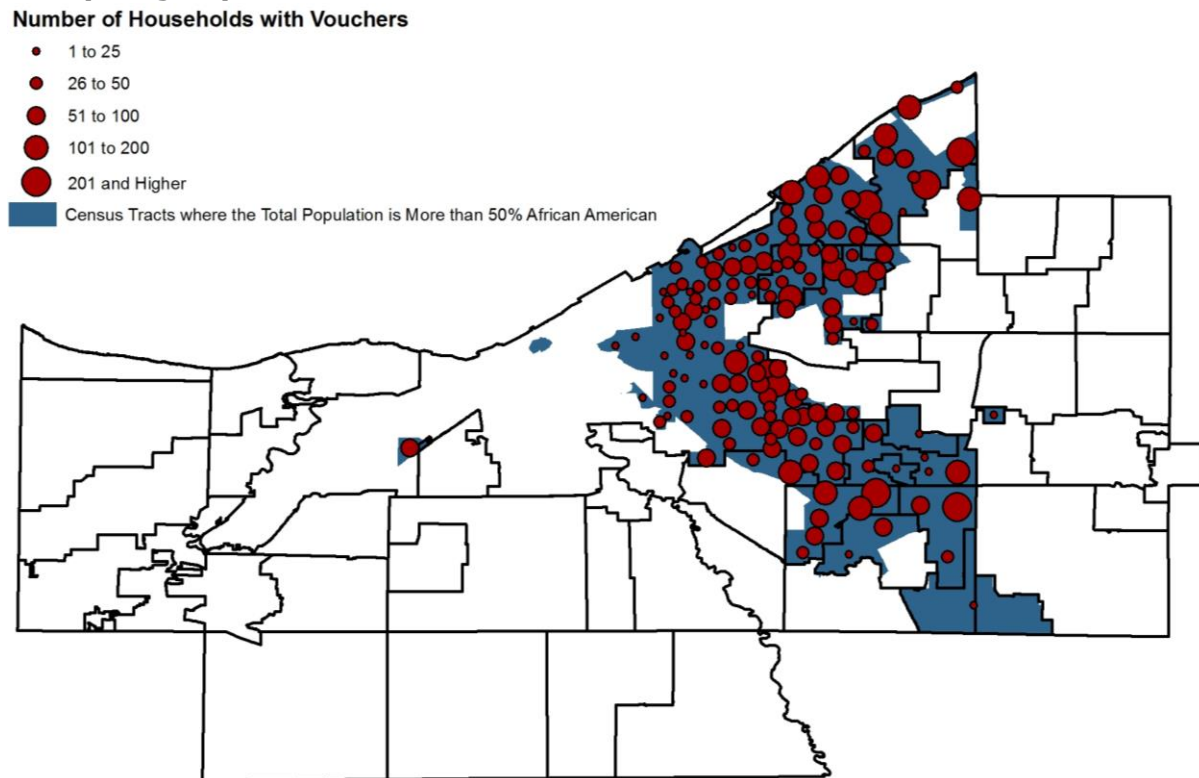
Test Number	City (Neighborhood)	Voucher Accepted?	Testing Result
1	North Olmsted	No	Denied
2	South Euclid	No	Denied
3	Parma	No	Denied
4	Parma Heights	No	Denied
5	Berea	No	Ignored
6	Fairview Park	No	Denied
7	Cleveland (Old Brooklyn)	No	Denied
8	Lakewood	No	Denied
9	Cleveland Heights	No	Ignored
10	Newburgh Heights	Yes	Accepted
11	Bedford	No	Denied
12	Woodmere	No	Denied
13	Bay Village	No	Denied
14	Cleveland Heights	No	Ignored
15	Lakewood	No	Ignored
16	Shaker Heights	No	Ignored
17	North Royalton	Yes	Accepted
18	Lakewood	No	Denied
19	Strongsville	No	Denied
20	Parma	No	Denied
21	Parma	No	Denied
22	Woodmere	No	Denied
23	Lyndhurst	Yes	Accepted
24	South Euclid	No	Denied
25	Cleveland (Detroit Shoreway)	No	Ignored
26	Cleveland (Ohio City)	No	Ignored
27	Westlake	No	Ignored
28	Parma Heights	No	Denied
29	North Olmsted	No	Denied
30	Cleveland Heights	No	Ignored
31	Shaker Heights	Yes	Accepted
32	Cleveland (Detroit Shoreway)	No	Denied
33	Bratenahl	No	Denied
34	Parma	No	Ignored
35	North Olmsted	No	Ignored
36	Broadview Heights	No	Ignored
37	Parma	No	Ignored
38	Cleveland (Tremont)	No	Denied
39	Cleveland (University)	No	Ignored
40	Mayfield	No	Denied
41	Cleveland Heights	No	Denied
42	Bedford	No	Denied
43	Cleveland Heights	Yes	Accepted
44	Mayfield Heights	No	Denied
45	Seven Hills	No	Denied
46	Cleveland (Kamm's)	No	Denied
47	North Olmsted	No	Ignored
48	Cleveland Heights	No	Denied
49	Cleveland Heights	No	Denied
50	Westlake	No	Denied

³⁶ Location data that could be used to identify housing providers not included.

Housing Voucher Discrimination and Race Discrimination in Cuyahoga County

51	Parma	No	Denied
52	Lakewood	No	Ignored
53	Lakewood	No	Denied
54	Parma	No	Denied
55	Parma	No	Denied
56	Cleveland	No	Ignored
57	Lakewood	No	Denied
58	Cleveland (Detroit Shoreway)	No	Ignored
59	Cleveland Heights	No	Denied
60	Olmsted Falls	No	Denied
61	Cleveland Heights	No	Denied
62	Parma	No	Denied
63	University Heights	No	Ignored
64	Mayfield Village	No	Ignored
65	Lyndhurst	No	Ignored
66	Cleveland (University)	No	Denied
67	Cleveland Heights	No	Denied
68	Broadview Heights	No	Denied
69	Cleveland Heights	No	Denied
70	Cleveland (Tremont)	No	Ignored
71	Cleveland Heights	No	Denied
72	Cleveland (Tremont)	No	Denied
73	Cleveland Heights	No	Denied
74	Cleveland (Detroit Shoreway)	No	Ignored
75	Lakewood	No	Ignored
76	Lakewood	No	Denied
77	Cleveland Heights	No	Ignored
78	North Olmsted	No	Denied
79	Westlake	No	Denied
80	Cleveland Heights	No	Ignored
81	Cleveland (Old Brooklyn)	No	Denied
82	Cleveland (Old Brooklyn)	No	Denied
83	Cleveland Heights	No	Denied
84	Cleveland (Buckeye-Shaker Square)	No	Denied
85	Lakewood	No	Ignored
86	Shaker Heights	No	Denied
87	Cleveland	Yes	Accepted
88	Lakewood	No	Denied
89	Cleveland (Detroit Shoreway)	No	Ignored
90	University Heights	No	Denied
91	Lakewood	No	Ignored
92	Cleveland Heights	Yes	Accepted
93	Middleburg Heights	No	Denied
94	Cleveland Heights	No	Ignored
95	Cleveland (Tremont)	No	Denied
96	Shaker Heights	No	Ignored
97	Lakewood	No	Ignored
98	Cleveland (Brooklyn Centre)	No	Denied
99	Lakewood	No	Ignored
100	Cleveland (Tremont)	No	Denied
101	Lakewood	Yes	Accepted

Figure 14: Households with Vouchers in Majority African American Neighborhoods in Cuyahoga by Census Tract, 2015



(Source: HUD, A Picture of Subsidized Housing, 2015; 2015 American Community Survey 5-Year Estimates)

The Housing Research & Advocacy Center is a not-for-profit agency whose mission is to promote fair housing and diverse communities, and to work to eliminate housing discrimination in Northeast Ohio by providing effective research, education and advocacy.

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