

## IDENTIFICATION OF IMPEDIMENTS TO FAIR HOUSING AND ACTION PLAN MATRIX

Identified Impediments	Actions to Eliminate Identified Impediments	Primary Responsibility	Partners	Time-table	Status
<b>I. Government Policies</b>					
A. Housing density and land use requirements restrict the location of affordable multi-family developments.	The City of Akron will maintain its practice of issuing conditional uses for multi-family and group home development where appropriate in order to promote affordable housing.	City of Akron	Fair Housing Task (FHFF)	3	Ongoing progress.
B. The zoning code has not received a major revision in 25 years.	Zoning Code will be reviewed to determine the guidelines that discourage affordable housing. City must be aware to utilize HUD 504 Accessibility Rule.	City of Akron	FHFF, Interested Community Organizations	2	Working on revisions to make it more readable; text changes underway. Ongoing project. Working document
C. Developers of new housing in Akron are not providing for accessibility upgrades (e.g. wheelchair ramps, bathroom modifications and wider doors), of housing.	New housing design will be encouraged to provide for accessibility upgrades at the inception for possible future use. Ensure use of visibility guidelines for publicly funded developments.	Home Builders Association, (HBA), Summit County Building Department, Prospective Developers	Tri-County Independent Living Fair Housing Contact Service Architects  <b>UNDC - NSP 25-50 HOME - HAVE VISIBILITY REQUIREMENTS</b>	2	Work in progress. City has met with HBA and discussed accessibility issues. 5% housing must be built for accessible (Mandatory). Include minority contractors; advocating increase to 10% for accessibility. <b>MUST HAVE ACCESSIBILITY LANGUAGE IN ZONING CODE.</b>
D. Families and individuals with limited financial resources have limited housing choices.	Developers will promote mixed-income housing developments; City will promote economic opportunities in economically distressed areas for low and moderate-income persons.	City of Akron	HBA  CDC/Non-Profit Developers  Habitat for Humanity	3	City has assisted CDC's/Habitat for Humanity to provide a mix of housing choices. <b>NEIGHBORHOOD STABILIZATION HOUSING - ALLOWS CITY TO SELL HOMES AT 120% AMI. MOST HOMES SOLD 50% TO 80% AMI.</b>
E. The greatest percentage of funding in City programs to rehabilitate affordable housing does not address the oldest and most deteriorated neighborhoods of the City.	Support the development of CDC's to improve housing in the oldest areas of the City.  Develop more housing activity in the oldest areas of the City.	City of Akron	Lenders  Habitat for Humanity	1	CDC's have worked closely with Banks. Operating support part of activity contract. Redevelopment active. Neighborhood Stabilization Program could have an impact.
F. Rental assistance programs and credit repair programs are not able to meet the need for this service that helps secure affordable housing.	Organizations provide education awareness to prospective or current tenants/ homeowners concerning but not limited to credit repair and assistance programs.	AMHA, Banks (credit repair), MSDC	United Way, University of Akron, Kent State University, Community Health Services, MSDC, FHCS, Summit County Consumer Affairs Board (SCCAB); Community Legal Aid. InfoLine, Inc. (HPRP)	1	Mustard Seed Development Center providing education and training. The new bankruptcy laws must be observed and effects analyzed.  Greenleaf provides credit counseling services.  Community Legal Aid F.I.L.E. Program Ongoing. <b>COMMUNITY PROVIDING RENTAL ASSISTANCE, HOMELESS PREVENTION, RAPID RE-HOUSING (HPRP). CITY EXPLORING OTHER SOURCES WHEN HPRP RUNS OUT.</b>
G. There does not seem to be a mechanism to identify housing need in Akron.	Principal agencies will monitor housing need in the City of Akron to identify potential housing shortages.	AMHA, City of Akron	HBA, University of Akron Homeless providers, CDC's	1	Continuum of Care filling this role and shortages identified and reported in Consolidated Plan. Develop housing locator
H. Accessibility requirements in multi-family developments are not being enforced (wheelchair users do not have access to front of building).	Accessibility and building requirements will be available upon request at the Building Departments.	City of Akron, Summit County.	FHCS, Tri-County Independent Living, Ohio Dept. of Development	1	Building Department reviews as commercial developments (4+ units). New construction has improved; rehabilitation projects are difficult to monitor. Ongoing

*Changes reflect Fair Housing Task Force meeting November 1, 2011 (Akron, Ohio). Updates appear in BOLD lettering*

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<b>I. Government Policies</b>											
I. The concentration of low-income public housing for families in the cities of Akron, Barberton and Cuyahoga Falls limits the housing choices for low-income families	The City of Akron will continue to seek I-1 development of low-income housing in the City vs. outside the City.	City of Akron, Akron Metropolitan Housing Authority (AMHA)	Summit County, NEFCO	1	Work in progress. Noted other communities spoke out against CDBG. Seen as lure for LMI population. City has discussed issue with Summit County. Rents are set by HUD - high rents						
J. Necessary household retail services are limited in areas of the city where affordable housing exists.	Encourage the private sector to establish groceries, pharmacies, banks, etc.	City of Akron	FHCS, CDC, Churches, Block Clubs, Banks, Local Boards of Trade	3	2 full-service Grocery stores have opened since the formation of the FHCF, Henry's ACME and Dave's Market.						
K. There is an education gap among the public on various aspects of conditional use policies.	The Zoning Division will provide a written statement of policy with regards to conditional use process and have it available upon request.	City of Akron Zoning		1	Available.						
L. Certain sections of the City have significant amounts of housing and infrastructure that needs replacement	The City will maintain a coordinated effort to upgrade public improvements and housing investment in the oldest sections of the City.	City of Akron	<b>LEAD PROGRAM HEALTHY HOMES ENERGY EFFICIENCY REHABILITATION</b>	3	City is reviewing housing program for 2010-2014 Strategy: Ongoing						
M. The City's authority to act to protect neighborhoods targeted for land scams and predatory mortgage lending has not been determined.	The City Law Department should determine: 1. the limits of the City's legal authority to enact legislation that supports and is not in conflict with state law regulating the conduct of parties who may be involved in predatory lending practices; 2. the extent to which the Attorney General's enforcement power under state law could be delegated to municipalities; 3. if the City can initiate litigation under S.B. 185; 4. if the City can issue cease and desist orders and injunctions to stop lending practices prohibited under S.B. 185; and 5. when the city has standing to take legal action against entities that engage in land scam and predatory lending practices that are statutorily prohibited.	City of Akron – Law department	Ohio Attorney General's Office, Ohio State Legal Services Association, SCCAB	1	Matter to be referred to City Administration and Prosecutor's Office. SCCAB & Ohio Attorney Generals Office has been aggressive in this matter.						
N. There has been no determination of what other Ohio communities are doing to address the problem of land scams and predatory mortgage lending and the effects of these problems.	City Council should request the City Law Department to research what other Ohio municipalities and counties have done to address the problem of land scams and predatory lending, as well as to counter the effects of these problems. Effects include: reduction of the tax base and tax revenue; loss or destruction of community assets in the form of vacant homes; reduction of the appreciation rate of real property; increased demand for service from the clerk's office, the courts and the Sheriff's Department; downward pull on the local economy as a result of the loss of homeowner purchasing power redirected to meet unwarranted debt obligations.	City of Akron – Law department	City of Akron Law Department, Summit County Prosecutor's Office, Summit County Office of Consumer Affairs, University of Akron	1	Matter to be referred to City Council. Ohio Attorney Generals Office has been aggressive in this matter.						
O. No tangible support for community-based efforts designed to address the problem of land scams and predatory mortgage lending.	The City of Akron should provide financial support to the Summit County Foreclosure Prevention Partnership program.	City of Akron Administration and City Council	Summit County, Summit County Office of Consumer Affairs, Fair Housing Contact Service, Community Legal Aid Services	1	Matter to be referred to City Council. SCCAB & Ohio Attorney Generals Office has been aggressive in this matter.						

IDENTIFIED IMPEDIMENTS	ACTIONS TO ELIMINATE IDENTIFIED IMPEDIMENTS	PRIMARY RESPONSIBILITY	PARTNERS	TIME-TABLE	STATUS
<b>1. Government Policies</b>					
P. Felons have a difficult time finding housing, especially sexual offenders (the Task Force realizes this is not a federally protected special class but felt the need to raise awareness).	Establish group homes utilizing trusted names like Haven of Rest and other successful organizations.  Should work to add these groups to protected class locally.	City of Akron, Summit County, faith-based groups, foundations	FHCS, Tri-County Independent Living, Ohio Dept. of Development, Coalition for the Homeless	1	<b>FELONS FOR HIRE TRULY REACHING YOU</b>

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<b>2. Education and Outreach</b>					
A. Except for Fair Housing month, there is very little information to promote awareness of fair housing and fair lending issues and policies.	Utilize media resources to promote Fair Housing and increase awareness of fair lending issues and problems. Utilize grass-roots groups, block clubs and church groups to get education message out. Possible forum or ad campaign with all units of government in Summit County to get message across.	Fair Housing Contact Services (FHCS), Akron Board of Realtors (ABR), Summit County, AMHA, Akron Summit Public Library. All units of government in Summit County	Media, Infoline, Banks, Legal Aid Providers, Community Organizations, (SCCAB)  Habitat for Humanity	1	FHCS began program where 95,000 postcards distributed, (funded by local lenders). WENDCO funded predatory lending forum. Akron Board of Realtors and Legal Aid sponsors continuing education that is mandatory. Voluntary legislative board to review suspected predatory lending cases. 2 additional staff (FHCS) to outreach to lenders. Water Department mailing staffers. Akron City Council passed a resolution to support Fair Housing Month and practices, review of current Fair Housing legislation ongoing.
B. Effective service by agencies to persons with disabilities in securing affordable housing is hampered by ineffective communication.	Utilize public forums to disseminate fair housing literature (lending, credit information, emergency assistance).	Tri-County Independent Living (add FHCS, UIDS, Community Legal Aid)	Media, (SCCAB)	1	Book with all fair housing info provided by Tri-County Independent Living. Getting better with coordination. More information provided in 2003 new booklet. SCCAB.
C. Presentations on complicated issues relating to lending or credit are difficult to understand by the intended consumer.	Presentation on these subjects will be crafted in simple language, clearly structured and graphically displayed (e.g. audio-visual display).	Banks, City of Akron, Summit County. Various city departments to coordinate frequently on mailings.	Akron Metropolitan Housing Authority, CDC's, (SCCAB)	1	City's use of PowerPoint has simplified presentations and information. Water Department staffers in monthly bills also effective.
D. Fair Housing Contact Service lacks the financial resources to advertise its services aggressively and communicate fair housing and lending laws to the public.	FHCS will utilize television and radio Public Access, Op-Ed pages in newspapers and special reports in local magazines to periodically promote Fair Housing/Fair Lending policies; FHCS should pursue additional funding.	FHCS	Local Media Outlets, lending organizations, (SCCAB), Community Legal Aid	2	Radio spots resulted in telephone increase by 5 times. News articles have also identified as responsible for increase in telephone traffic. Leverage of funding is ongoing; use of students; opinion articles must be created.
E. Need for more active participation in community-based efforts designed to inform people of the problem of landscams and predatory mortgage lending.	Actively participate in and support community-based efforts and programs designed to inform and assist people victimized by or at risk from land scams and predatory mortgage lending as well as the effects of these problems on the community. Encourage public entities to seek federal funding in support of these activities (e.g. federal reserve and Federal Home Loan Bank programs).	Akron Planning Department	Summit County, Summit County Office of Consumer Affairs, Banks, Non-profit Housing Organizations, Infoline.	3	This activity will be ongoing.

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<b>3. Lending and Credit</b>											
A. Influencing lending activity by area lenders is limited because public information on lending activity is not widely known.		Continue review of local lending practices using Home Mortgage Disclosure Act (HMUDA) Data. Public forums discussing reports will be held annually. Government entities could influence banks by not working with banks.		State of Ohio Office of the Comptroller of Currency, Local Banks		Fair Housing Contact Services, City of Akron, Fair Housing Task Force		1		The City will establish forum for Banks to address questions.	
B. The lack of bank branches in minority or low-income neighborhoods reduces the opportunity for low income or minority persons to know of and take advantage of lending options.		Outreach by banks will be continued in poor and minority communities especially to distinguish themselves from predatory lending facilities. Community Reinvestment Officers are encouraged to become more creative in promoting Bank programs.		Local Banks		Mustard Seed Development Center A Monitoring Group FHTF, SCCAB		1		Ongoing discussions with lenders. Should local government review where bank accounts held and advocate for LMI communities.	
C. Banks and other financial institutions do not know the market in poor and minority census tracts.		Banks will partner with established neighborhood organizations to promote lending information.		Local Banks, Community Development Corporations		Community Development Organization AMHA Community Centers Churches		2		FHCS partners with local lenders to provide information.	
D. Residents of poor and minority census tracts do not trust banks and other financial institutions.		Community Development Corporations will work to become loan originators in partnership with lending institutions.		CDC's, Local Banks		LISC, Foundations		3		Ongoing Process. <b>TO MEET SEMI-ANNUALLY.</b>	
E. Regardless of their Community Reinvestment Act (CRA) ratings, banks are allowed to operate business as usual without repercussions.		Penalty provisions of CRA should be strengthened and enforced. Local organizations will publicize poor records locally and communicate objections to regulatory agencies.		Office of Comptroller of the Currency (Regulates banks)		FHCS		2		To be discussed at Banking Forum. Pending implementation.	
F. Subprime lenders operate in neighborhoods without monitoring from any agency. The marketing used, especially in poor and minority communities, have made these communities particularly vulnerable to high interest rates, and poor value of service, i.e. (deceptive practices), i.e. high fees, high loan to value ratio, over appraisals, large number of foreclosures.		Suspected Predatory Lenders/practices will be monitored and reported to the Better Business Bureau. Years after the formation of the FHTF, Predatory Lending continues to be a problem.				City Akron Bar Association FHCS Prosecution FHCS SCCAB		3		Legislation to allow local governments to punish predatory lenders stopped at State level. BBB and Community Legal Aid is good for clients to call before becoming remain active and involved through legislation and support of education and awareness of its residents.	
G. Conventional lenders have not taken the lead to actively reduce the recurrence of land scams, predatory mortgage lending and foreclosures.		The City of Akron and Summit County should sponsor and convene a meeting with conventional lenders to discuss and develop an action plan to deal with land scams, predatory mortgage lending and foreclosures. The action plan should include recommendations on creating either lending opportunities or lending products suitable for homebuyers and owners eligible for mortgage loans in the sub-prime market and creating a "Best Practices" protocol to be used by local lenders for the benefit of homebuyers and owners in the sub-prime market.		City of Akron		Summit County, local lenders		1		Meeting to be arranged within 6 months; not completed to date. City should make this meeting a priority!	

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<b>4. Insurance</b>							
A. The lack of data on property or mortgage insurance redlining restricts the public's ability to influence this activity.	Partner with University to conduct research to examine the occurrence of redlining by various insurance companies.	University of Akron, Kent State University, Summit County	FHCS, FHFF, HUD	2		There are other groups doing similar work.	
B. There are few forums held to discuss insurance policies and practices. Citizens in poor and minority census tracts may not be receiving information regarding fair policies.	Using seminars and other promotional venues, educate current and potential policyholders on insurance issues and how to deal with insurance companies. This will provide tools to equip policyholders with coverage and reduce cancellation of policies.	Local Insurance Agencies/Brokers	CDC's, Block Clubs, Universities	2		Ongoing process to identify someone from insurance industry to discuss matter. Possible presentation by insurance representatives in early 2006 (not implemented).	

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<b>5. Enforcement</b>							
A. Adequate funding is necessary in order to continue monitoring tools to identify discrimination in housing choice, (i.e., site testing).	Continue to provide site testing to identify discriminatory acts/policies to fair housing choice. The results of the tests will be utilized for community education and awareness.	Fair Housing Contact Service	City of Akron, University of Akron, SC	1		FHCS received funding from Consolidated Plan; ongoing process.	
B. Approved accessibility standards not always enforced during review process.	Inspectors will review required accessibility standards at appropriate stages of building process.	City of Akron, Summit County	FHTF, FHCS, NEFCO, Tri-County	2		Ongoing process.	
C. Housing developments in the City of Akron receiving federal funds do not always exhibit diversity of occupancy.	Entities receiving federal funds for housing projects will have affirmative marketing plans developed and implemented in collaboration with local fair housing organizations. Development Corporations will achieve diversity within housing. Support Public Housing De-concentration plan developed by AMHA.	City of Akron, Summit County, non-profit development corporations, (CDC)	NEFCO, HUD, AMHA, Home Builders	2		All contracts discuss providing a mix of new construction styles. FHCS is targeting groups accused of steering.	
D. A broad-based group does not systematically review Fair Housing policies and practices in the community.	Maintain the Fair Housing Task Force as a body to assess fair housing impediments in the City of Akron and provide ongoing analysis.	FHTF	FHCS	1		Ongoing process. To meet quarterly: <b>TO MEET SEMI-ANNUALLY.</b>	
E. Some owners of rental property are not aware of fair housing regulations and requirements.	Distribute fair housing and landlord/tenant information at the time of Rental Registration with the Akron Health Department.	City of Akron	FHCS, AMHA, Akron Board of Realtors, Housing Advisory Board	1		HUD 504 Accessibility Rule should be sent to property owners on registry.	
F. Housing developments are often not diverse in the City of Akron.	Entities developing housing will be encouraged to have Affirmative Market Plans. Identify and create process for filing complaint for protected classes at the local level, specifically for gender identity and sexual orientation.	FHCS	CDC's	3		Ongoing process; stipulation written into every contract with housing providers using CDBG/HOME funds. Law Department	

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<b>6. Special Needs</b>											
A. Architects, inspectors, and construction managers do not always know accessibility guidelines for multi-family development resulting in costly renovations.		Periodic dissemination of guidelines or presentations to architect or construction trade groups.		FHCS, Tri-County, City of Akron		Building Department		3		Construction groups that receive complaints must participate in ADA and Fair Housing training.	
B. There is a significant lack of rent assisted, accessible housing for families who have a family member using a wheelchair.		Provide financial assistance for accessibility renovations. Encourage the development of handicapped accessible or adaptable housing on all projects receiving federal funds. Promote the development of handicapped accessible or adaptable housing in new private developments. A clearinghouse of providers will be established to ensure persons with disabilities have access to services.		Tri-County, FHCS, AMHA, City, County		FHTF, United Disability Services, Rebuilding Together Summit County		2		Tri-County has worked with landlords and Homebuilders Association.	
C. Persons with disabilities may have difficulty receiving needed services in a timely manner.		A clearinghouse of providers will be established to ensure persons with disabilities have access to services.		Tri-County, MRDD Board		City, County, FHTF, UDS, CSS, AMHA, ADM Board		3		UDS has performed well in this role.	
D. There is a pattern of inefficient delivery of services, which jeopardizes housing persons with disabilities.		Monitoring by FHTF and engage in dialogue with those providers.		FHTF <b>TRI-COUNTY - MEDICAID CONTINUUM OF CARE - MAINSTREAM RESOURCE SOAR</b>				3		Must meet with banks and service providers, insurance providers to receive better information. Found difficulty with some with mental disability. The system has not been user friendly...much room for improvement, including clients with dual diagnosis.	
E. <b>CONTINUING LOSS</b> of affordable housing stock for special needs individuals.		Develop alternatives for special needs cases.				Community Legal Aid Tri-County Oriana House <b>CONTINUUM OF CARE</b>		1		Update: Status of Property to be closed & to be sold by AMHA: Residents are being relocated.	
F. Special Needs population has a housing shortage in terms of affordable, accessible and supportive properties. State of Ohio ranks 7th in the nation for affordable housing need.		Encourage developers, real estate agents and other information and service providers to promote available properties.		HBA, ABR, City and County Government		Tri-County		2		Research will assess what is available and what can realistically be performed for this segment. AMHA should request additional funds for disability modifications, especially for Section 8 properties.	
G. National Banks have no ownership in area and cannot be contacted on foreclosed property not locally owned		Develop relationship with national banks, strengthen relationship with National Stabilization Trust through Neighborhood Development Services; Task Force should meet with NDS before end of 2009		City of Akron, Summit County, NST, NDS		FHCS, Tri-County Independent Living, Ohio Dept. of Development, Coalition for the Homeless.		1		Establishing contact between Fair Housing Task Force and Neighborhood Development Services, Inc. Ongoing	

## **VI. ABBREVIATIONS:**

ABR-	Akron Board of Realtors
ACSCUL-	Akron Community Service Center and Urban League
AMHA-	Akron Metropolitan Housing Authority
APS-	Akron Public Schools
ASCAA-	Akron Summit Community Action Agency
ASCPL-	Akron Summit County Public Library
BBB-	Better Business Bureau
CDBG-	Community Development Block Grant
CDC's-	Community Development Organizations
ESG-	Emergency Shelter Grant
FHCS-	Fair Housing Contact Service
FHTF-	Fair Housing Task Force
KSU-	Kent State University
HBA-	Home Builders Association
HUD-	Department of Housing and Urban Development
LISC-	Local Initiatives Support Corporation
ODOD-	Ohio Department of Development
SC-	Summit County
SCCAB-	Summit County Community Affairs Board
TRI-COUNTY-	Tri-County Independent Living
UA-	University of Akron
UDS-	United Disability Services

## **VII. PARTICIPATING ORGANIZATIONS AND INDIVIDUALS**

- Akron Metropolitan Housing Authority
- Akron Board of Realtors
- Akron Summit Community Action Agency
- Akron Community Service Center and Urban League
- Alpha Phi Alpha Homes, Inc.
- Fair Housing Contact Service
- Akron Home Builders Association
- **COALITION FOR THE HOMELESS**
- First Merit Bank
- Habitat For Humanity
- Key Bank
- National City Bank
- Fifth Third Bank
- Tri County Independent Living
- NID Housing Counseling Agency (A HUD Approved Housing Counseling Agency)
- ACCESS, Inc.
- United Disability Services

- H.M. Life Opportunity Services
- Ethel Chambers-Community Activist
- **NEIGHBORHOOD DEVELOPMENT SERVICES, INC.**
- U.S. Department of Housing and Urban Development
- City of Akron
- Summit County Department of Development
- Western Reserve Legal Services (now Community Legal Aid)
- Westside Neighborhood Development Corporation
- East Akron Neighborhood Development Corporation
- Claudia Coleman-Community Activist
- University Park Neighborhood Association
- University of Akron