

Housing Voucher Mobility in Lorain County

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About Housing Research & Advocacy Center

Housing Research & Advocacy Center (The Housing Center) is a 501(c)(3) nonprofit 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

The Housing Choice Voucher Program was created to expand access to housing for low-income households by providing a rental subsidy that allows them to find housing in the private rental market, but across the United States voucher program participants are clustered in racially segregated, low-opportunity areas. Housing Research & Advocacy Center (The Housing Center) examined factors that affect the housing choices of people using housing choice vouchers in Lorain County, Ohio to assess the mobility of a housing voucher. The Housing Center did so by examining data of affordable housing programs and by surveying voucher program participants.

In the largest voucher program in Lorain County, 63.6% of people using housing vouchers are African American, Hispanic/Latino, or both and are clustered in racially segregated areas with high concentrations of poverty, low educational opportunities, and high exposure to environmental health hazards. When surveyed, the majority of voucher program participants responded that they wanted to live in neighborhoods with high-quality local schools (52.9%), close to grocery stores (64.7%), close to hospitals (66.7%), and low crime (86.3%). They also needed affordable housing costs (86.3%).

Fair Market Rent (FMR), set by the United States Department of Housing and Urban Development, determines the buying power of a housing voucher and is applied across the region. Housing markets vary widely across Lorain County, and FMR rates are insufficient for voucher holders to afford rental housing in the high-growth, high-opportunity areas on the eastern side of the county. Voucher holders, which are classified as low-income or extremely-low-income, face additional financial burdens in affording higher security deposits required in higher-cost neighborhoods.

The Low-Income Housing Tax Credit (LIHTC) Program provides an opportunity to expand housing mobility for voucher holders by financing low-income housing in areas of high opportunity. Housing providers receiving LIHTCs are required to accept vouchers at their properties. In Lorain County, LIHTC Program developments are not expanding housing choice. The majority of LIHTC properties in Lorain County are in areas with concentrations of racialized poverty.

The Housing Center recommends:

1. Implement Small Area FMR rates which consider local variation in the rental market
2. Create a mobility counseling program that encourages and assists voucher holders in moving into high-opportunity neighborhoods
3. Create a security deposit assistance program to reduce the increased financial hardship for voucher holders moving into high-opportunity neighborhoods
4. Encourage the Ohio Housing Finance Agency to prioritize a “both/and” approach, developing in both high-opportunity neighborhoods and high-poverty neighborhoods when awarding LIHTCs
5. Market the Housing Choice Voucher Program to landlords in high-opportunity neighborhoods
6. Support prohibition of source of income discrimination in municipal fair housing laws to ensure equal access to housing
7. Ensure all voucher recipients are informed of their fair housing rights at mover briefing sessions

II. INTRODUCTION TO HOUSING VOUCHERS

Housing vouchers are tenant-based rental subsidies designed to assist low-income individuals and families in finding safe and affordable housing in the private rental market. In 1974, the Housing and Community Development Act established Section 8 rental housing assistance for low-income families who spent a high proportion of their income on housing.¹ In 1998, the Quality Housing and Work Responsibility Act passed, which merged the Section 8 housing voucher and certificate program under the Housing Choice Voucher Program (HCVP).² The HCVP is now the federal government's largest housing subsidy program, assisting more than 2 million families.³ The vouchers are administered by local public housing agencies (PHAs) to eligible families, who are responsible for finding suitable housing of their choice with a landlord who agrees to rent under the program. Eligibility is based upon total annual gross income and family size. If the unit passes an inspection for housing quality standards of safety and health, which the PHA determines, a housing subsidy, known as the "Housing Assistance Payout," is paid directly to the landlord by the PHA on behalf of the voucher program participant. The participant is then responsible for the difference between the rent charged and the subsidy provided by the PHA.⁴ There are several types of housing vouchers, including the Department of Housing and Urban Development's Housing Choice Voucher Program, the Veteran's Affairs Supportive Housing program, the Shelter Plus Care Program, the Housing Opportunities for Persons with AIDS Program, and the Non-Elderly Disability Voucher Program.

A. Types of Vouchers

1. Housing Choice Voucher Program

The Housing Choice Voucher Program offers tenant-based rental assistance to help low-income individuals and families afford decent and safe rental housing. The HCVP is administered locally by public housing agencies (PHAs) which receive federal funds from the U.S. Department of Housing and Urban Development (HUD).⁵ In Lorain County, housing choice vouchers are administered through the Lorain Metropolitan Housing Authority (LMHA). There is a multi-step process in the HCVP. First, the participant is issued a rental voucher and is free to locate a dwelling appropriate for the family needs in the private rental market. Upon selection of a unit, LMHA inspects the unit pre-lease and then annually to ensure the unit meets HUD housing quality standards. If the unit passes inspection, LMHA enters into a Housing Assistance Payment (HAP) contract with the landlord, which establishes that LMHA will pay a portion of the rent to the owner on behalf of the participant. The participant is required to pay roughly

¹ Equal Rights Center, *A Step Away from Homelessness: Housing Choice Voucher Holders Denied Housing in Montgomery County, MD*, Available at: http://www.equalrightscenter.org/site/DocServer/Montgomery_County_Section_8.pdf?docID=150 (accessed December 17, 2015).

² U.S. Department of Housing and Urban Development, "Summary of the Quality Housing and Work Responsibility Act of 1998 (Title V of P.L. 105-276)", Available at: <http://www.hud.gov/offices/pih/phr/about/titlev.pdf> (accessed January 25, 2016).

³ U.S. Department of Housing and Urban Development, "Housing Choice Vouchers Fact Sheet," Available at: http://portal.hud.gov/hudportal/HUD?src=/program_offices/public_indian_housing/programs/hcv/about/fact_sheet (accessed December 2, 2015).

⁴ U.S. Department of Housing and Urban Development, *Housing Choice Voucher Tenant Accessibility Study: 2001-2002* (2004).

⁵ U.S. Department of Housing and Urban Development, "Housing Choice Vouchers Fact Sheet," Available at: http://portal.hud.gov/hudportal/HUD?src=/program_offices/public_indian_housing/programs/hcv/about/fact_sheet (accessed December 2, 2015).

30% of the adjusted monthly income toward rent and utilities. In Lorain County, there are approximately 2,974 HCVP vouchers in use.⁶

2. Veterans Affairs Supportive Housing (VASH)

The Veterans Affairs Supportive Housing (VASH) program is a joint initiative of HUD and the Department of Veterans Affairs (VA). Housing choice voucher rental assistance is offered via HUD such that homeless veterans and their families can rent permanent, privately-owned housing and access case management and clinical and supportive services, which are provided by the VA at VA medical centers and community-based outreach clinics.⁷ Since 2008, HUD and the VA award VASH vouchers based on geographic need (highest geographic concentration of homeless veterans throughout the United States) and the administrative performance of PHAs. Upon determining geographic need, the VA central office identifies VA facilities in the corresponding communities and HUD selects PHAs near the identified VA facilities.⁸ The PHAs are then invited to apply for the HUD-VASH vouchers. In Lorain County, there are 75 VASH vouchers in use.⁹

3. Shelter Plus Care (S+C)

The Shelter Plus Care program of HUD provides rental assistance grants for permanent housing along with supportive services from other sources for homeless people with disabilities. The S+C program serves those with serious mental illness, chronic alcohol or drug problems, AIDS, and related diseases. In 2009, the HEARTH Act consolidated the S+C program with the Supportive Housing Program and the Section 8 Moderate Rehabilitation SRO program into a single grant program, the Continuum of Care (CoC). The Continuum of Care Program encompasses five program components: permanent housing, transitional housing, supportive services only, homeless management information system (HMIS), and homelessness prevention. The CoC continues S+C program elements of tenant-based rental assistance, sponsor-based rental assistance, and project-based rental assistance.¹⁰ Tenant-based rental assistance is offered to homeless persons who choose their housing for a term of 5 years. Sponsor-based rental assistance provides rental assistance through contracts between the grant recipient and either a private nonprofit sponsor or a community mental health agency that is a public nonprofit that owns or leases dwelling units where the participants reside; it also lasts for a term of 5 years. The project-based rental assistance program offers rental assistance to the owner of an existing structure wherein the owner agrees to lease units to homeless people. It is a 5-year lease contingent upon the residents staying at the location.¹¹

⁶ Lorain Metropolitan Housing Authority, "Housing Programs," Available at: www.lmha.org/housing-programs/ (accessed September 29, 2016).

⁷ U.S. Department of Veteran Affairs, "Homeless Veterans: The Department of Housing and Urban Development and VA's Supportive Housing (HUD-VASH) Program," Available at: <http://www.va.gov/HOMELESS/HUD-VASH.asp> (accessed November 30, 2015).

⁸ U.S. Department of Housing and Urban Development, "HUD-VASH Vouchers," Available at: http://portal.hud.gov/hudportal/HUD?src=/program_offices/public_indian_housing/programs/hcv/vash (accessed November 30, 2015).

⁹ Lorain Metropolitan Housing Authority, "Housing Programs," Available at: www.lmha.org/housing-programs/ (accessed September 29, 2016).

¹⁰ U.S. Department of Housing and Urban Development, "Programmatic Crosswalk of Changes: Continuum of Care Program, Supportive Housing Program, and Shelter Plus Care Program Requirements," Available at: https://www.hudexchange.info/resources/documents/ProgrammaticCrosswalk_CoC_SHP_SPC.pdf (accessed November 8, 2016).

¹¹ U.S. Department of Housing and Urban Development, "S+C Eligibility Requirements," Available at: <https://www.hudexchange.info/programs/spc/spc-eligibility-requirements/> (accessed November 30, 2015).

4. Housing Opportunities for Persons with AIDS (HOPWA)

The Housing Opportunities for Persons with AIDS (HOPWA) is the only Federal program that is dedicated to housing those living with HIV or AIDS. The Department of Housing and Urban Development makes grants to local communities, nonprofit organizations, and states for projects that support low-income persons living with HIV/AIDS and their families.¹² The program offers tenant-based rental assistance as well as short-term rent, mortgage, and utility assistance.¹³ In 2012, the City of Cleveland received between \$500,000 and 1 million dollars in HOPWA grants to support persons living with HIV/AIDS and their families. For 2016-2017, the Cleveland MSA received a total of \$952,331 in HOPWA funding.¹⁴ The City of Cleveland Department of Health receives the funds and coordinates HOPWA funding throughout the five-county Cleveland MSA area that includes Lorain County.¹⁵

5. Non-Elderly Disabled Vouchers (NED)

The Non-Elderly Disabled Voucher (NED) is a special purpose voucher program that began in 1997. There are two categories in the NED voucher program. Category 1 allows non-elderly persons or families with disabilities to access affordable housing in the private market. Category 2 vouchers enable non-elderly persons with disabilities who currently reside in nursing homes or other healthcare institutions to transition into the community; this category of the program began in 2011.¹⁶ Lorain County does not have any Category 2 vouchers in use. Lorain County has 175 NED Category 1 vouchers in use.¹⁷

B. Public Housing Authorities in Lorain County

1. Lorain Metropolitan Housing Authority (LMHA)

LMHA is the public housing authority of Lorain County, administering the HCVP and managing the public housing of the county. LMHA is one of the largest landlords in Lorain County, offering public housing, project-based Section 8 for elderly and people with disabilities, HCVP, low-income housing tax credit properties (LIHTC), Living with Assistance, Shelter + Care, and Market Rate apartments and single-family homes. LMHA manages 1,376 public housing units that include 80 scattered site units, 200 Section 8 New Construction units, 51 LIHTC units, and 11 market rate units. The market rate units consist of seven 0/1 bedroom apartments and four single-family 3-bedroom ranch homes. The public housing units are located in the cities of Lorain, Elyria, Amherst and Oberlin and in Sheffield Township.

The HCVP is also managed by LMHA, with 2,974 housing choice vouchers in use in the HCVP: 75 of which are VASH vouchers (homeless veterans) and 175 of which are NED vouchers for Non-Elderly Disabled individuals. There are a total of 3,069 households in the LMHA Housing Choice Voucher

¹² U.S. Department of Housing and Urban Development, "Housing Opportunities for Persons with AIDS," Available at: <https://www.hudexchange.info/programs/hopwa/> (accessed December 1, 2015).

¹³ Ohio Development Services Agency, "Community Grants, Loans, Bonds, and Tax Credits: HOPWA," Available at: https://www.development.ohio.gov/cs/cs_hopwa.htm (accessed December 1, 2015).

¹⁴ Northeast Ohio Coalition for the Homeless, "City of Cleveland Public Meeting on Community Development Funding," Available at: <http://www.neoch.org/cleveland-homeless-blog/2016/3/2/city-of-cleveland-public-meeting-on-community-development-fu.html> (accessed December 1, 2016).

¹⁵ U.S. Department of Housing and Urban Development, "HOPWA 20: Housing Innovations in HIV Care," Available at: <http://portal.hud.gov/hudportal/documents/huddoc?id=hopwa20.pdf> (accessed January 29, 2016).

¹⁶ U.S. Department of Housing and Urban Development, "Non-Elderly Disabled (NED) Vouchers," Available at: http://portal.hud.gov/hudportal/HUD?src=/program_offices/public_indian_housing/programs/hcv/ned (accessed September 29, 2016).

¹⁷ Lorain Metropolitan Housing Authority, "Housing Programs," Available at: www.lmha.org/housing-programs/ (accessed September 29, 2016).

Program. Of the households, 44.2% have disabled heads of household, 15.2% have elderly heads of household, and 82.3% have female heads of household. White voucher households make up 57.9% of participating households, while African American households comprise 39.2% and Hispanics/Latinos, 24.4%. Families with children make up 45% of households in the LMHA HCVP.¹⁸

Vouchers are accepted at LIHTC properties throughout Lorain County. LMHA Oberlin Homes is a 51-unit LIHTC property in Oberlin. The homes have 2, 3, and 4 bedroom units. LMHA also has a project-based housing voucher program, which is the Section 8 New Construction LCEHC (Lorain County Elderly Housing Corporation). It offers one-bedroom apartments in two high-rise buildings (100 units each, 200 units total), located in Elyria and Lorain specifically for elderly and persons with disabilities.¹⁹

LMHA provides place-based subsidized homes for both elderly and families: 674 LMHA units designated specifically for elderly/persons with disabilities in Lorain, Elyria, Oberlin, and Amherst & 702 units in family developments in Lorain, Elyria, Oberlin, and Sheffield Township. Under the direction of the Nord Center, Lorain County provides the Lakeview Plaza Living with Assistance Program, which offers affordable housing to elderly and persons with disabilities who are in need of assistance to live independently.²⁰

¹⁸ Lorain Metropolitan Housing Authority, Streamlined Annual PHA Plan 2016, available at: <http://www.lmha.org/about-lmha/annual-reports/> (accessed January 20, 2017).

¹⁹ Lorain Metropolitan Housing Authority, "Housing Programs," Available at: www.lmha.org/housing-programs/ (accessed September 29, 2016).

²⁰ Lorain Metropolitan Housing Authority, "Housing Programs," Available at: www.lmha.org/housing-programs/ (accessed September 29, 2016).

III. REVIEW OF PREVIOUS LITERATURE

A. Housing Choice Voucher Program

The Housing Choice Voucher Program is designed to allow participants access to the private rental market. Studies have shown that, across the United States, participants of the Housing Choice Voucher Program tend to cluster together within metropolitan areas.²¹ Participants are not necessarily clustered in the core of cities. Nearly half of voucher holders live in suburban areas, but those suburban areas are more likely to have low-income populations and poor job access.²² Reports have shown that voucher program participants wish to live in high-quality housing in safe neighborhoods with good schools and that they need access to public transportation and grocery stores.²³ It is possible that market forces and weaknesses in public policy are directing voucher program participants into distressed neighborhoods.

The buying power of the voucher, rental affordability, and other conditions placed on the holder affect the choice that participants make in securing housing. HUD sets Fair Market Rent (FMR) which determines the maximum value of the voucher. If fewer units are available at or under FMR in high-opportunity neighborhoods, then households with vouchers are excluded. Additionally, the voucher only partially covers monthly rent. Voucher holders must pay 30% of their income toward rent (or a flat minimum rent), and PHAs generally do not pay the security deposit for a unit (usually equal to one month's rent). For very-low-income households, this represents a significant financial burden. The voucher holder is also subject to time constraints in which they must find and have a unit ready for them to move into.

A survey of private landlords in Austin, Texas showed that 91% of private landlords legally refuse to accept housing vouchers.²⁴ 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.²⁵ A significant portion of the rental units was unavailable to voucher program participants in those cities. Landlords might refuse a voucher for a variety of reasons. Accepting voucher pay 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 have been made. This could prevent the unit from generating income during that period. Landlords also reported that some PHAs have been late with

²¹ David P. Varady, Xinhao Wang, and Patrick Dunhaney, "The Geographic Concentration of Housing Vouchers, Blacks, and Poverty Over Time: A Study of Cincinnati, Ohio, USA," *Urban Research & Practice* vol. 3(2010), 39-62. Ingrid Gould Ellen, Michael C. Lens, and Katherine O'Regan, "Memphis Murder Revisited: Do Housing Vouchers Cause Crime?" United States Department of Housing and Urban Development, Office of Policy Development and Research, Washington D.C. (February 2011) https://www.huduser.gov/publications/pdf/ellen_memphismurder_assistedhousingrcr07_v2.pdf (Accessed January 12, 2016).

Lenore Healy and Michael Lepley, "Housing Voucher Mobility in Cuyahoga County," (February, 2016), 43-45.

²² Kenya Covington, Lance Freeman, and Michael Stoll, "The Suburbanization of Housing Choice Voucher Recipients," Brookings Institution: Metropolitan Policy Program (2011).

²³ Connecticut Fair Housing Center, "Housing Mobility: What do Housing Voucher Recipients Want?" (April 2013), 5-7.

Kathrin Hexter, W. Dennis Keating, Mittie Davis Jones, Brian Mikelbank, and Michael Veres, "Understanding the Location Decisions of the Cuyahoga Metropolitan Housing Authority's Housing Choice Voucher Holders: Pilot Study," Prepared for: Cuyahoga Metropolitan Housing Authority (February, 2015), 45-47.

²⁴ Austin Tenants' Council, "An Audit Report on the Refusal of Housing Choice Vouchers by Landlords in the Austin MSA," (2012), 2-3.

²⁵ Equal Rights Center, "Will You Take My Voucher?: An Update on Housing Choice Voucher Discrimination in the District of Columbia," (2013), 9-11.

payments.²⁶ Difficulties in dealing with a local PHA could have the effect of discouraging landlords from participating in the program.

There is also a stigma associated with housing vouchers that may discourage some housing providers from engaging in the program. Voucher holders are perceived by the public, and even proposed by some writers, to generate crime and lower school test scores and property values, but research has suggested the voucher holders tend to be located in neighborhoods that are already distressed and the participants themselves are unlikely the source of these problems.²⁷ 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.²⁸ Discrimination against voucher holders, by a housing provider, can often serve as a proxy for illegal, racially-based housing discrimination.²⁹

B. Housing Voucher Mobility

Housing voucher mobility is a regionally-focused people-based strategy that seeks to connect low-income residents to access well-resourced neighborhoods with quality education and jobs. The mobility strategy is designed to address regional inequities, historic patterns of discrimination, and residential segregation that limit upward mobility. Various measures can be undertaken to promote opportunity-based housing mobility, via housing vouchers, affordable housing developments in areas with greater opportunity, and by offering supportive services to those low-income residents who choose to move to these communities.³⁰ As captured by John A. Powell: “Housing is an important element within a web of other opportunity structures that impact the life outcomes of metro residents...Housing...can enhance or impede access to other opportunity structures. Accessing stable, affordable housing in a vibrant area contributes greatly to improvements in other key life areas, such as employment, health, education, civic engagement, and wealth creation. Unfortunately, low-income people of color have largely been denied this access.” A housing strategy that promotes access to opportunity can also be a vehicle for racial and economic fairness.³¹

However, there are numerous barriers to housing mobility and access to opportunity for low-income households, including exclusionary zoning practices, discrimination in the private market, racial steering, and predatory lending. Among these is the jurisdictional fragmentation of separate political jurisdictions

²⁶ 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.

²⁷ Reinout Kleinham and David Varady, “Moving Out and Going Down? A Review of Recent Evidence on Negative Spillover Effects of Housing Restructuring Programs in the United State and Netherlands,” *International Journal of Housing Policy* vol. 11, issue 2 (2011), 155-174.

Sean Zielenbach, “Moving Beyond the Rhetoric: Section 8 Housing Choice Voucher Program and Lower Income Urban Neighborhoods,” *Journal of Affordable Housing and Community Development* vol. 16 (2007), 9-39.

²⁸ Emily Badger, “How Section 8 Became a Racial Slur: A History of Public Housing in America,” *Washington Post*, June 15, 2015.

²⁹ Paula Beck, “Fighting Section 8 Discrimination: The Fair Housing Act’s New Frontier,” *Harvard Civil Rights-Civil Liberties Review* vol. 31 (1996), 155-186.

³⁰ Kelly L. Patterson, Robert Mark Silverman, Li Yin, and Laiyun Wu, “Neighborhoods of Opportunity: Developing an Operational Definition for Planning and Policy Implementation,” *Journal of Public Management & Social Policy* vol.22, Number 3 (2016), 143-158.

³¹ John A. Powell, “Opportunity-Based Housing,” *Berkeley Law Scholarship Repository*, Berkeley Law (2003).

in a metropolitan area which have autonomous control over zoning and planning; such fragmentation that allows for exclusionary policies often relegates affordable housing to municipalities with low tax bases and a high-need population and thereby contributes to higher levels of racial and economic fragmentation.³² The location of federal and state-subsidized rental housing also contributes to such segregation, which clusters affordable housing in economically disadvantaged communities of color.³³ Voucher holders face constraints such as discriminatory practices and limited voucher purchase power for market-rate apartments in more opportunity-rich areas.³⁴ This often leads to voucher holders becoming re-concentrated in segregated neighborhoods that are majority-minority and high poverty, where affordable housing has largely been sited and is financially accessible to them with the voucher.

The Housing Choice Voucher Program can be a critical tool to address residential segregation, foster the de-concentration of poverty, achieve greater housing choice and lessen the cost burden on low-income households. The Gautreaux model exhibits the success of using vouchers to achieve these benchmarks; in this model, those minority low-income voucher households who made moves to racially-integrated, high-opportunity areas achieved numerous positive outcomes in education, health, and employment.³⁵ A recent study of HUD's Moving to Opportunity for Fair Housing demonstration, a housing voucher mobility program that took place in five cities, showed that when children moved from a high-poverty neighborhood to a low-poverty neighborhood by the age of 8 their lifetime earnings were increased by \$99,000.³⁶

³² Ibid.

³³ John A. Powell, Jason Reece, Christy Rogers, and Samir Gambhir, "Communities of Opportunity: A Framework for a More Equitable and Sustainable Future for All," Kirwan Institute for the Study of Race and Ethnicity, Ohio State University (2007).

³⁴ Lenore Healy and Michael Lepley, "Housing Voucher Mobility in Cuyahoga County," (February, 2016); 13-15, 37-38.

³⁵ Victoria Basolo and Mai Thi Nguyen, "Does Mobility Matter? The Neighborhood Conditions of Housing Voucher Holders by Race and Ethnicity," *Housing Policy Debate*, vol. 16, Issue 3/4, Fannie Mae Foundation (2005).

³⁶ Raj Chetty, Nathaniel Hendren, and Lawrence F. Katz, "The Effects of Exposure to Better Neighborhoods on Children: New Evidence from the Moving to Opportunity Experiment," Harvard University and NBER (May 2015), 34.

IV. CLUSTERING OF VOUCHER HOLDERS

National studies have shown that households using vouchers tend to be clustered in low-income, minority neighborhoods with high crime rates.³⁷ Lorain County has a largely white, non-Hispanic population at 79.1% with 7.8% of the population African American, non-Hispanic and 8.8% Hispanic/Latino. The county poverty rate is 14.6%; however, minorities have significantly higher poverty rates than their white counterparts (11.1%). African Americans have the highest poverty rate at 39.9% and the Hispanic/Latino poverty rate is 29.5%. The largest concentrations of African Americans in the county are in the cities of Lorain, Elyria, Oberlin, and Avon. The largest concentrations of Hispanics/Latinos are in the cities of Lorain, Elyria, Sheffield Township, Avon, and Avon Lake.³⁸ Voucher concentrations in the county correlate to areas of higher poverty (see Figure 2). Areas of minority concentration coincide with concentrations of publicly-supported housing and housing choice vouchers (see Figure 3). Publicly-supported housing, such as public housing, project-based section 8, multi-family housing, and LIHTC, is largely located in Lorain and Elyria as well as smaller concentrations in Oberlin, Amherst, and Sheffield Township.³⁹

Housing Choice Voucher Program participants live primarily in the cities and surrounding townships of Lorain, Elyria, and Avon (which include Elyria Township, Sheffield Township, and Vermillion) as shown in Figure 1. Less dense concentrations are found in Sheffield, Sheffield Lake, LaGrange, Wellington, Penfield Township, Oberlin, Amherst, and Carlisle. The locations and availability of housing within the buying power of a voucher affect where households using vouchers live. The buying power of the voucher is set by the housing authority within limits determined by HUD. Low-Income Housing Tax Credit properties (LIHTC) are an additional source of private housing. When accepting housing tax credits under the LIHTC program, property owners must agree to accept voucher holders as tenants.

³⁷ David P. Varady, Xinhao Wang, and Patrick Dunhaney, "The Geographic Concentration of Housing Vouchers, Blacks, and Poverty Over Time: A Study of Cincinnati, Ohio, USA," *Urban Research & Practice* vol. 3(2010), 39-62. Ingrid Gould Ellen, Michael C. Lens, and Katherine O'Regan, "Memphis Murder Revisited: Do Housing Vouchers Cause Crime?" United States Department of Housing and Urban Development, Office of Policy Development and Research, Washington D.C. (February 2011) https://www.huduser.gov/publications/pdf/ellen_memphismurder_assistedhousingrcr07_v2.pdf (Accessed January 12, 2016).

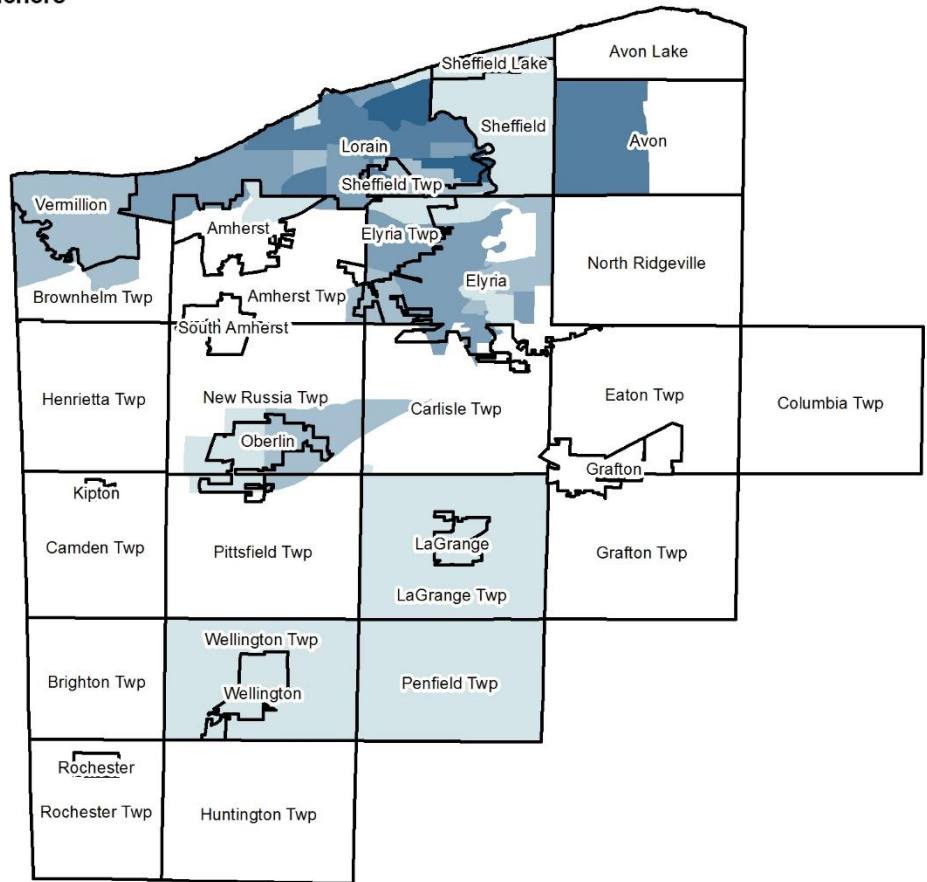
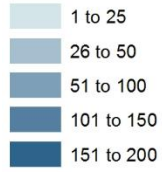
Kenya Covington, Lance Freeman, and Michael Stoll, "The Suburbanization of Housing Choice Voucher Recipients," Brookings Institution: Metropolitan Policy Program (2011).

³⁸ U.S. Census Bureau, American Community Survey, 2010-2014 5-Year Estimates.

³⁹ U.S. Department of Housing and Urban Development, Affirmatively Furthering Fair Housing (AFFH) tool 2015.

Figure 1: Number of Households with Vouchers in Lorain County by Census Tract, 2013

Number of Households with Vouchers



(Source: HUD eGIS)

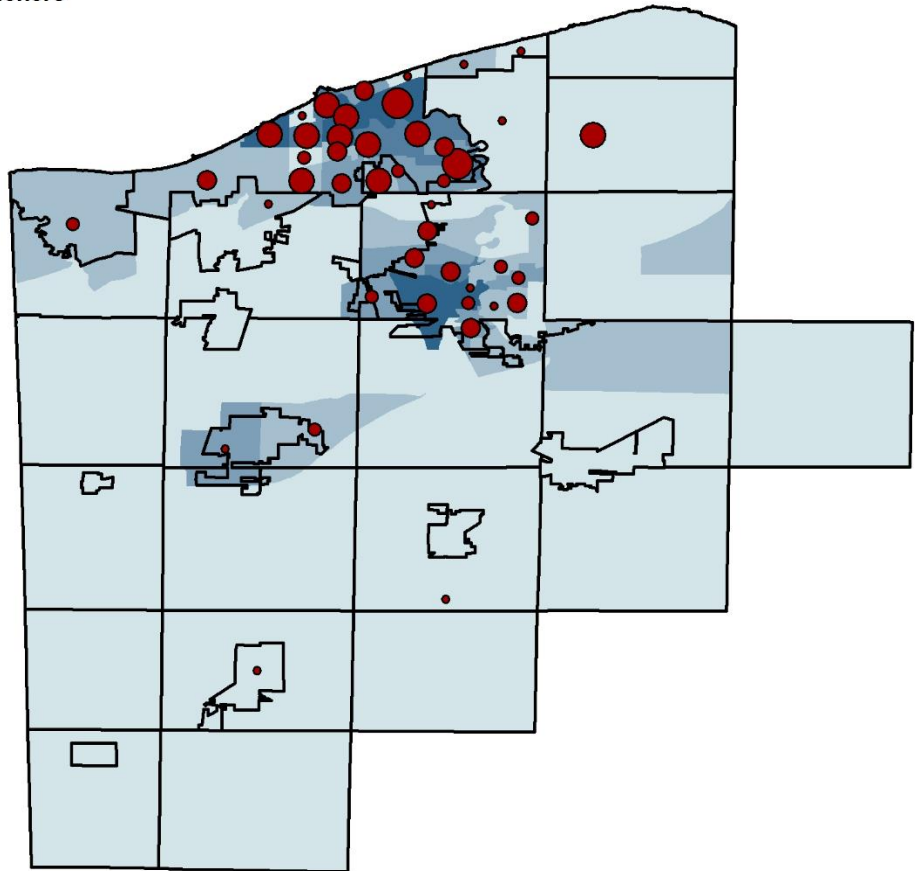
Figure 2: Households with Vouchers and Poverty Rate in Lorain County by Census Tract, 2013

Number of Households with Vouchers

- 1 to 25
- 26 to 50
- 51 to 100
- 101 to 150
- 151 to 200

Poverty Rate

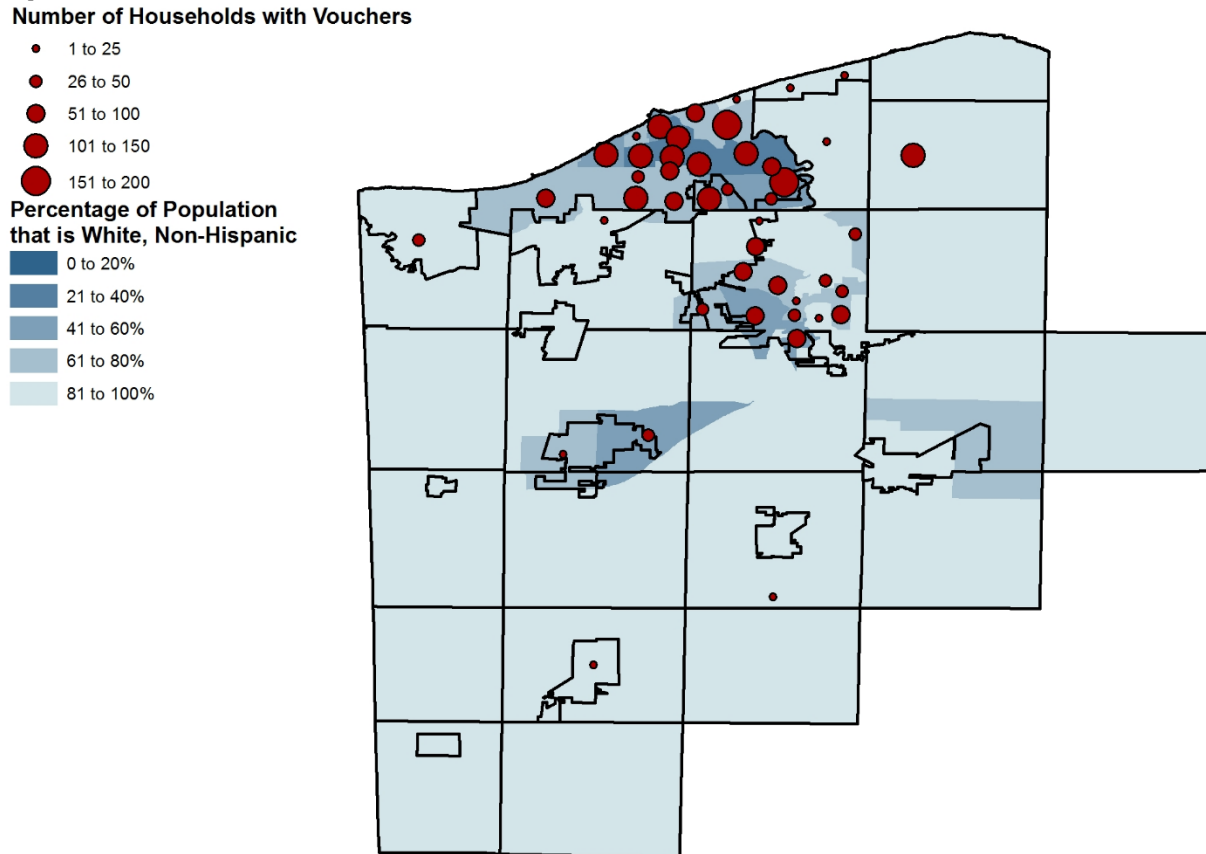
- 0 to 10%
- 11 to 20%
- 21 to 30%
- 31 to 40%
- 41 to 50%



(Source: HUD eGIS; 2014 American Community Survey 5-Year Estimates)

Figure 2 shows that the largest concentrations of voucher holders live in areas with the highest poverty rates. In the City of Lorain, dense clusters of voucher holders are located in tracts with 41-50% poverty; other smaller clusters are grouped into still relatively high poverty rate tracts (20-40%). Voucher holders in the City of Elyria likewise are located in areas of greater poverty.

Figure 3: Households with Vouchers and Minority Concentrations in Lorain County by Census Tract, 2013



(Source: HUD eGIS; 2014 American Community Survey 5-Year Estimates)

A. Fair Market Rent

To qualify for a Housing Choice Voucher, a household’s income may not exceed 50% (known as a Very-Low-Income-Household) of the Area Median Income (AMI) as determined by HUD. As mandated by the Quality Housing and Work Responsibility Act of 1998, PHAs are required to reserve at least 75% of their vouchers for Extremely-Low-Income-Households, or households with incomes less than 30% of AMI. In Lorain County, the AMI for 2016 was \$66,600. An extremely low-income household of two made under \$16,020 a year.⁴⁰

⁴⁰ Ohio Development Services Agency, “FY 2016 HUD Income Limits,” available at: https://www.huduser.gov/portal/datasets/fmr/fmr_il_history/data_summary.odn (Accessed October 11, 2016).

Table 1: Lorain County Income Limits, 2016

2016 Income Limit Category	1 Person	2 Person	3 Person	4 Person	5 Person	6 Person	7 Person	8 Person
Low Income (80% of AMI) Limits	\$37,350	\$42,650	\$48,000	\$53,300	\$57,600	\$61,850	\$66,100	\$70,400
Very Low Income (50%) Limits	\$23,350	\$26,650	\$30,000	\$33,300	\$36,000	\$38,650	\$41,300	\$44,000
Extremely Low Income (30%) Limits	\$14,000	\$16,020	\$20,160	\$24,300	\$28,440	\$32,580	\$36,730	\$40,890

(Source: HUD User, Fair Market Rent and Income Limit)

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 the 40th percentile or 50th percentile of rents charged for standard rental housing. LMHA uses the 40th percentile FMR. On a case-by-case basis, the PHA can approve a Payment Standard up to 120% as a reasonable accommodation for people with disabilities. At most, voucher holders are permitted to contribute 40% of their income towards rent. LMHA provides a payment standard at 100% of the 40th percentile FMR.

Table 2: Fair Market Rent and PHA Payment Standards in Lorain County, 2016

Number of Bedrooms:	Efficiency	1	2	3	4
40 th Percentile FMR 2016	\$499	\$614	\$773	\$1,017	\$1,073
50 th Percentile FMR 2016	\$535	\$658	\$829	\$1,091	\$1,151
LMHA 2016 Payment Standard	\$499	\$614	\$773	\$1,017	\$1,073

(Source: HUD User, Fair Market Rent and Income Limit; Lorain Metropolitan Housing Authority)

Renter-occupied units comprise 28.4% of all occupied housing units in Lorain County. One-bedroom units make up 19.2% of rental units in the county. Two-to-three bedroom units comprise 68.9% of units in the county, which are the unit sizes most often needed for families with children that make up the majority of HCVP applicants and participant households.⁴¹ The average HCVP household in Lorain County lives in a 2 or 3 bedroom unit (76.3% in 2017).⁴² One-bedroom unit rents are largely in the \$500-749 range (35.4%) and the \$200-499 range (26.7%). For two-bedrooms, 43.9% of units are in the \$500-\$750 range, followed by 26.9% in the \$750-999 range. For three bedrooms or more, 35.2% are in the \$1,000 or more range, followed by 21% in the \$750-999 and 17% in the \$500-750 range. Assuming most

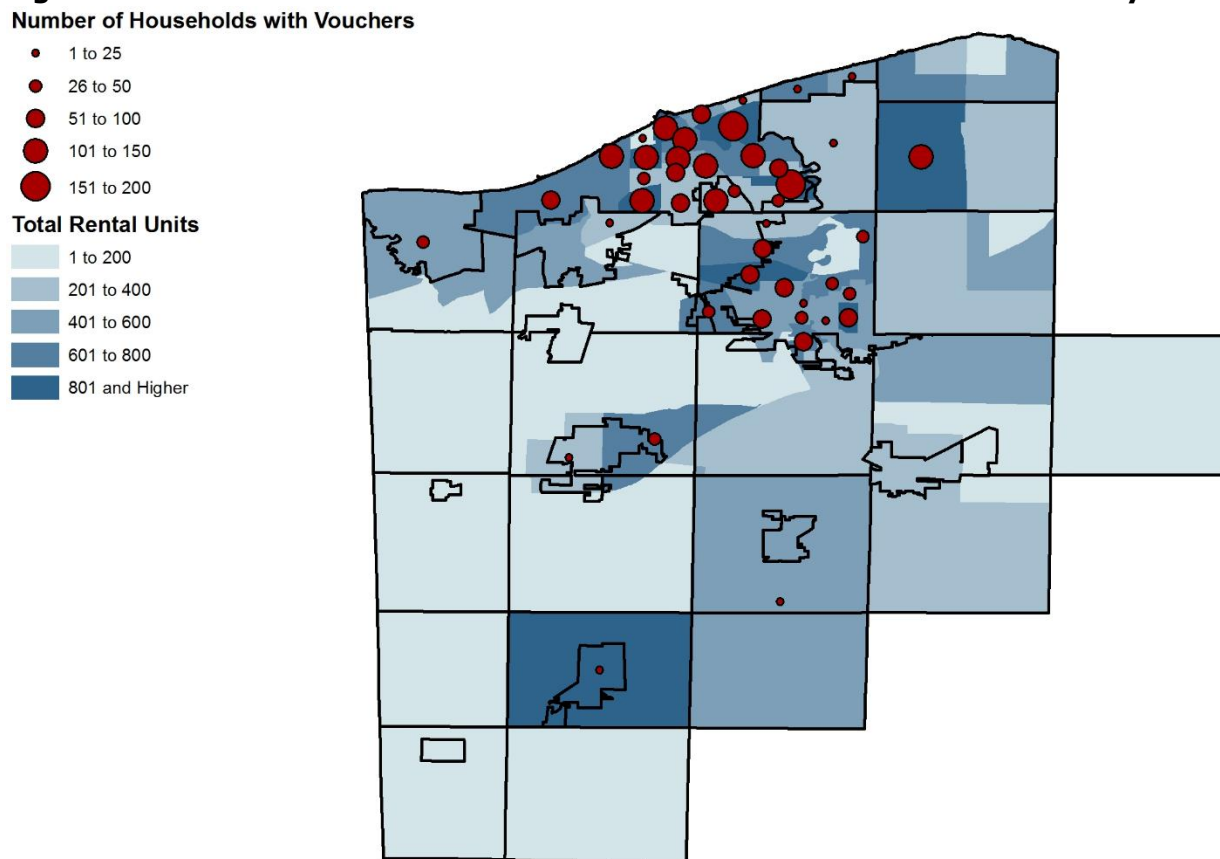
⁴¹ 2013 American Community Survey 5-Year Estimates

⁴² Lorain Metropolitan Housing Authority, "Certification Listing – Tenant Statistic Report," (January 9, 2017).

households desire a two-bedroom unit, the average buying power of a LMHA voucher is \$773. The median contract rent in Lorain is \$747 in 2014, but rents vary throughout the county.⁴³

Figure 4 shows where voucher households are located in relation to the total rental units in Lorain County. The majority of voucher holders are concentrated in the Cities of Lorain and Elyria, which contain a moderate to high amount of rental units. However, while some voucher holders are located in areas of greater rental unit concentration, a portion of voucher households live in areas of the cities with a lower amount of rental units available. Those areas where voucher holders are concentrated also correlate to areas of greater poverty. Figure 5 shows areas in Lorain County where average rent for a two-bedroom apartment was higher than FMR as set by HUD. Households using vouchers would face greater difficulty finding units in the eastern portion of Lorain County, specifically in Avon, Avon Lake, North Ridgeville, Eaton, Columbia, Sheffield, and parts of the City of Elyria.

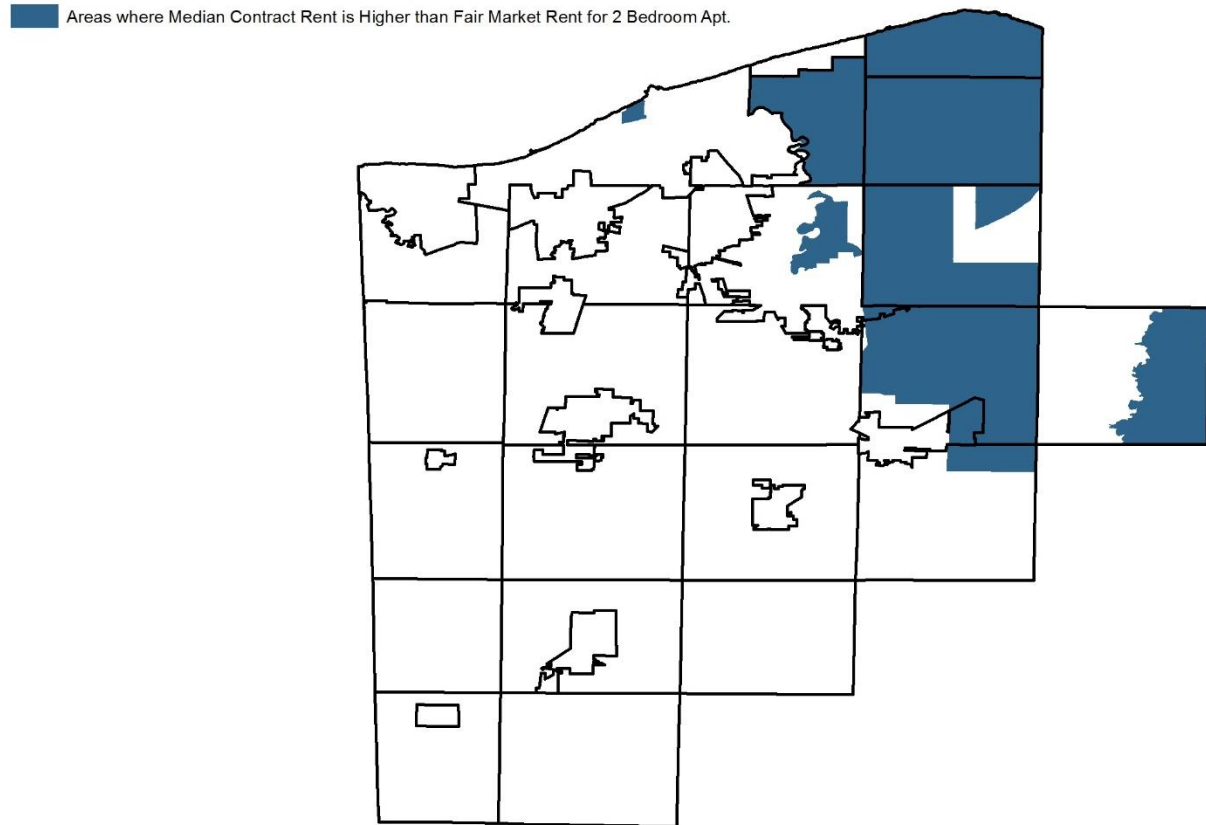
Figure 4: Households with Vouchers and Total Rental Units in Lorain County



(Source: HUD eGIS; 2014 American Community Survey 5-Year Estimates)

⁴³ 2014 American Community Survey 5-year Estimates.

Figure 5: Areas where 2014 Median Contract Rent is Higher than 2015 FMR (40th Percentile) for Two Bedroom Apartments in Lorain County



(Source: 2014 American Community Survey 5-Year Estimates)

B. Low-Income Housing Tax Credit Properties

Properties financed using the Low-Income Housing Tax Credit program (LIHTC) are a significant source of affordable units to participants of a voucher program. The LIHTC program is the largest property-based subsidy to rental housing production in the United States. Across the U.S., the LIHTC program produces approximately 100,000 rental units per year.⁴⁴ Created through the Tax Reform Act of 1986, the LIHTC program allocates tax credits to states based on population in the amount of \$2.35 per state resident (as of 2016).⁴⁵

Properties developed using the LIHTC program receive tax credits annually for 10 years at either 70 percent (competitive allocation) or 30 percent (noncompetitive allocation) of the present value of the qualifying costs of the development. In Ohio, the LIHTC program is administered by the Ohio Housing Finance Agency (OHFA) according to the state's Qualified Allocation Plan (QAP). Applicants submit proposals to OHFA which distributes the tax credits based on the priorities specified within the QAP. The QAP is updated annually or biannually. Properties that receive LIHTC are subject to affordability restrictions for 15 years, the "compliance period." Properties must comply with one of two criteria: a minimum of 20 percent of all units must be occupied by tenants with incomes less than 50 percent of the Area Median Income (AMI) OR 40 percent of units must be occupied by tenants with incomes less than 60 percent of AMI. An additional requirement of the LIHTC program is that housing providers using the program cannot refuse to rent to a participant of a housing voucher program, assuming the voucher holder can afford to rent an available unit.⁴⁶

The LIHTC program offers an opportunity to expand housing mobility for people in low-income households, both for those using a housing voucher and for those without one, by distributing affordable rental properties throughout a region. In the State of Ohio, approximately 15% (14,201 units) of all LIHTC units were occupied by a household using a housing voucher in 2011.⁴⁷

Placement of LIHTC properties can restrict housing choice if the properties are clustered in specific areas. Clustering LIHTC properties together can perpetuate patterns of concentrated poverty and racial or ethnic segregation. Such concentration of low-income housing in racially segregated neighborhoods potentially violates the Fair Housing Act (42 USC § 3608 (d)) which explicitly extends AFFH obligations to all federal agencies that are involved in housing and development-related programs.⁴⁸ In the early years of the LIHTC program, nearly all allocations were in high-poverty areas. In the first decade of the 2000s, this trend has continued, particularly the siting of family units in high-poverty areas.⁴⁹ LIHTC allocations

⁴⁴ Department of Housing and Urban Development Office of Policy Development and Research, *What Happens to Low-Income Housing Tax Credit Properties at Year 15 and Beyond?* (August 2012), 1-3.

⁴⁵ Michael Novogradac, "IRS Population Figures Mean LIHTC, Bond Cap Increases for Most States," Novogradac & Company LLP, News & Analysis, (accessed December 16, 2016): <https://www.novoco.com/notes-from-novogradac/irs-population-figures-mean-lihtc-bond-cap-increases-most-states>

⁴⁶ Department of Housing and Urban Development Office of Policy Development and Research, *What Happens to Low-Income Housing Tax Credit Properties at Year 15 and Beyond?* (August 2012), 4-5.

⁴⁷ Brett Barkley, Amy Higgins, and Francisca G.-C. Ritchter, "Do Low-Income Rental Housing Programs Complement Each Other? Evidence from Ohio," Federal Reserve Bank of Cleveland, working paper no. 14-29R (2016), 24.

⁴⁸ Poverty & Race Research Action Council, "Letter to Treasury Department urging release of Title VIII guidance and regulations for LIHTC Program," National Policy Advocacy, Civil Rights Mandates in the Low-Income Housing Tax Credit Program, (2012).

⁴⁹ Myron Orfield, "Racial Integration & Community Revitalization: Applying FHA to LIHTC", *Vanderbilt Law Review*, Vol. XX, 101-158 (2005).

throughout the state of Ohio, especially in the Cleveland-Elyria Metropolitan Statistical Area, are predominately in high-poverty, minority neighborhoods.⁵⁰

1. Locations of LIHTC Properties in Lorain County

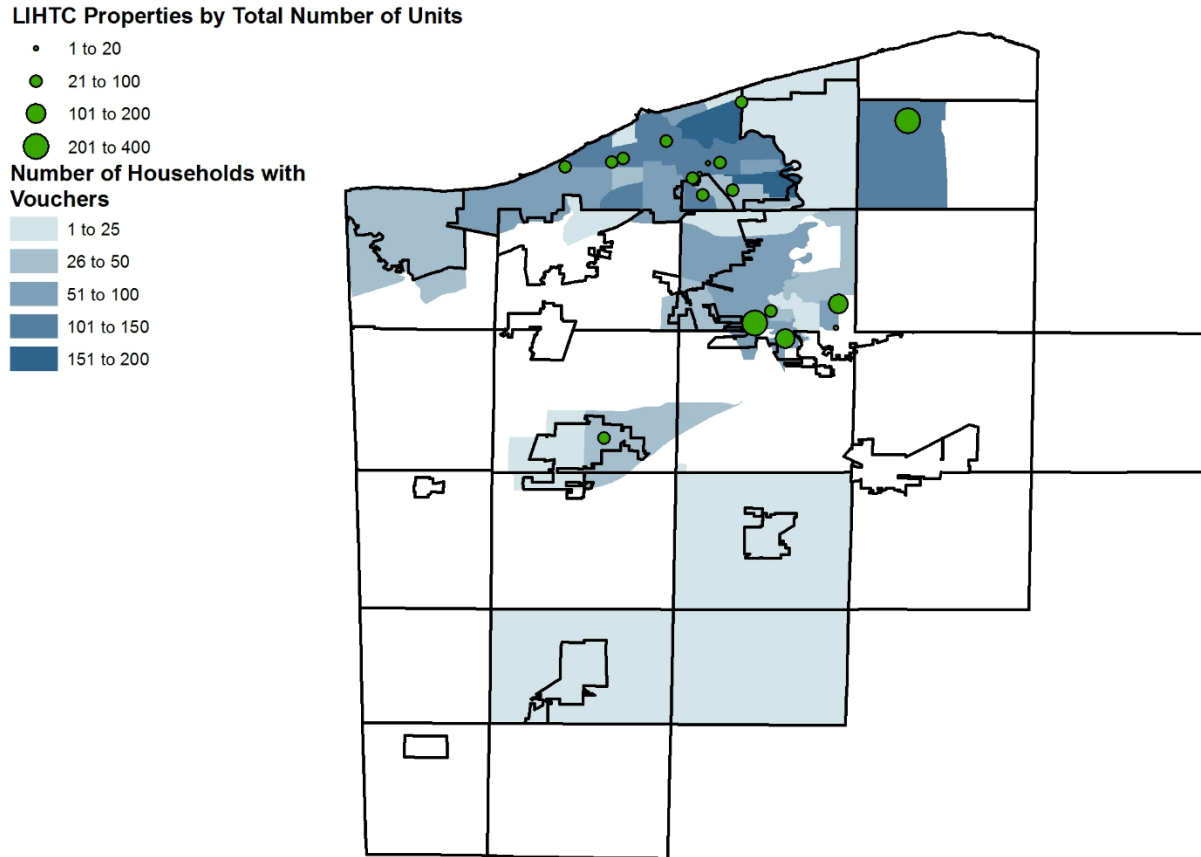
In Lorain County, most properties that are financed using the LIHTC program are in census tracts with high concentrations of voucher holders (see Figure 6). There are some census tracts that have small clusters of voucher program participants and no LIHTC properties (as in Wellington, LaGrange, and Penfield), while others contain LIHTC properties and have a small percentage of voucher holders (Oberlin). However, the majority of LIHTC properties are located in those same areas with dense clusters of voucher holders, primarily Lorain, Elyria, and Avon (see Figure 7). The majority of properties financed using the LIHTC program are in census tracts with high poverty rates (see Figure 8) and where racial and ethnic minorities make up the majority of the population (see Figure 9).

In Lorain County, there are 20 LIHTC properties that were placed in service between 1993 and 2014: 12 in the City of Lorain, 1 in Avon, 6 in Elyria, and 1 in Oberlin. There are 1,449 total low-income units, about 81.7% of all units in LIHTC properties in the county. There are 580 low-income units in Lorain, 566 low-income units in Elyria, 252 low-income units in Avon, and 51 low-income units in Oberlin (managed by LMHA). Twelve of the properties have 3-bedroom units available and six of the properties have 3 and 4-bedroom units, which would better serve large families.⁵¹ As Figure 8 shows, these properties are primarily in high-poverty tracts and areas of greater racial and ethnic minority concentration (see Figure 9) with the exception of Avon.

⁵⁰ Jill Khadduri and Carissa Climaco, "LIHTC Awards in Ohio, 2006-2015: Where Are They Providing Housing for Families with Children," Abt Associates (July 2016).

⁵¹ Department of Housing and Urban Development, LIHTC Database Access 2014, available at: <http://lihtc.huduser.gov/> (accessed September 6, 2016).

Figure 6: LIHTC Properties by Location and Number of Households with Vouchers by Census Tract in Lorain County, 2013



(Source: HUD eGIS)

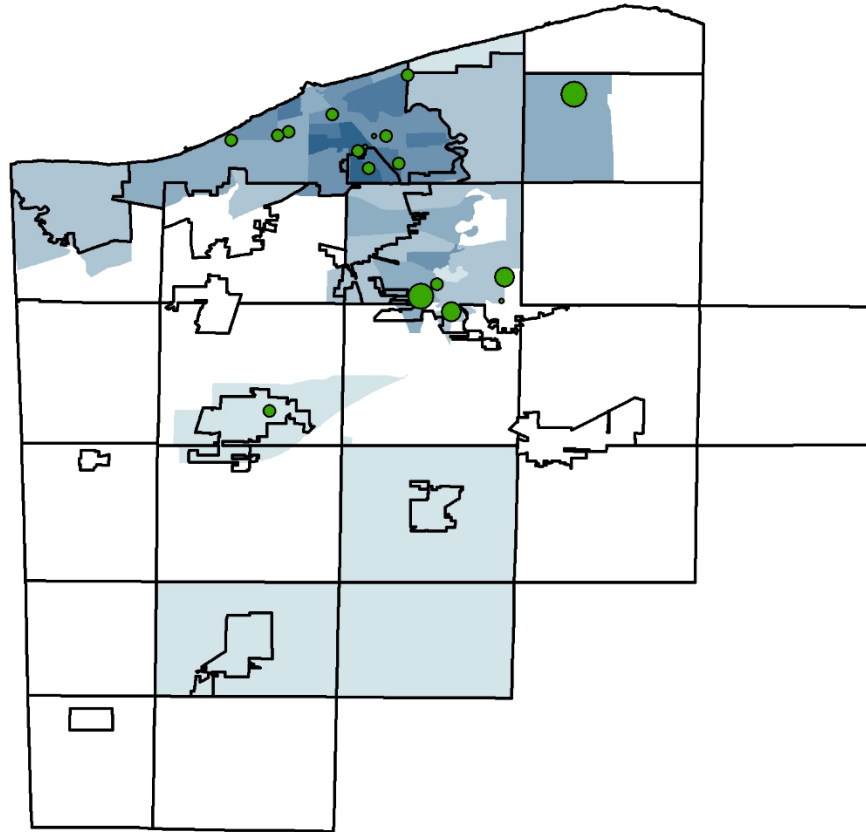
Figure 7: LIHTC Properties by Location and Households with Vouchers as a Percentage of Total Households by Census Tract in Lorain County, 2013

LIHTC Properties by Total Number of Units

- 1 to 20
- 21 to 100
- 101 to 200
- 201 to 400

Percentage of Rental Households With Vouchers

- .01 to 5%
- 5.1 to 10%
- 10.1 to 15%
- 15.1 to 20%
- 20.1 to 25%
- 25.1 and Higher



(Source: HUD eGIS; 2014 American Community Survey 5-Year Estimates)

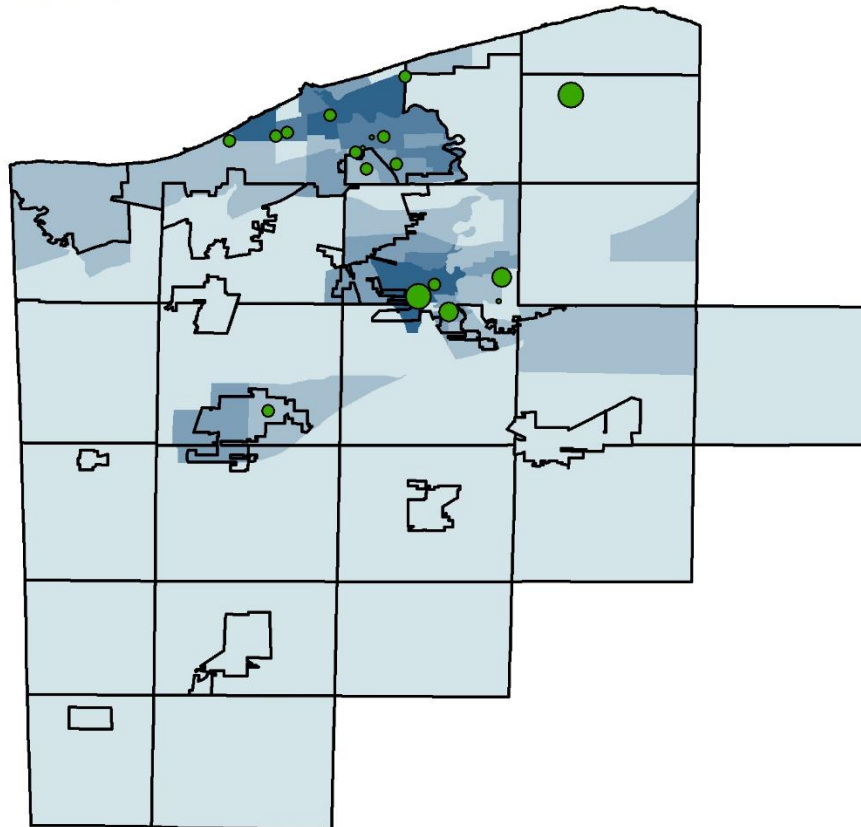
Figure 8: LIHTC Properties and Poverty Rate in Lorain County by Census Tract, 2013

LIHTC Properties by Total Number of Units

- 1 to 20
- 21 to 100
- 101 to 200
- 201 to 400

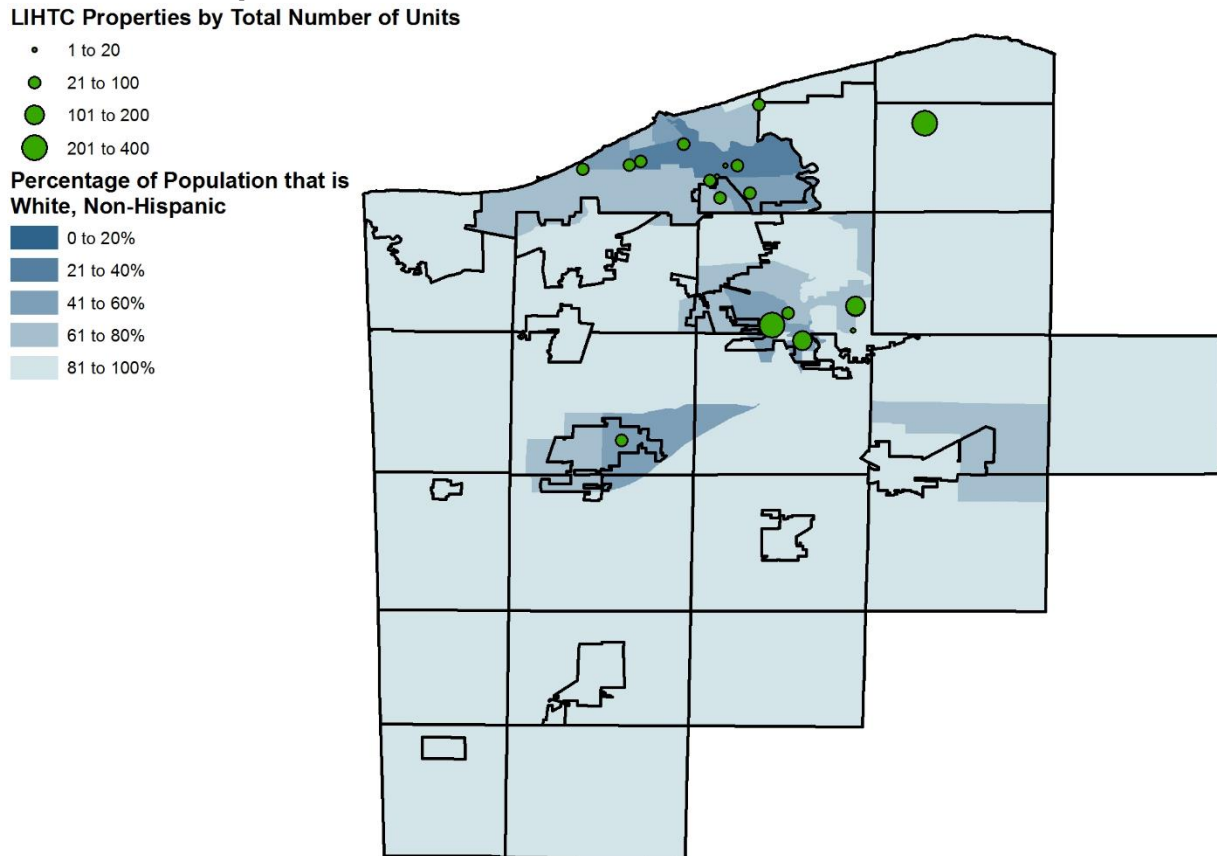
Poverty Rate

- 0 to 10%
- 11 to 20%
- 21 to 30%
- 31 to 40%
- 41 to 50%



(Source: HUD eGIS); 2014 American Community Survey 5-Year Estimates)

Figure 9: LIHTC Properties and Racial and/or Ethnic Composition by Census Tract in Lorain County, 2013



(Source: HUD eGIS; 2014 American Community Survey 5-Year Estimates)

Figure 10 shows the placement of LIHTC properties (shown in green) in relation to other affordable housing receiving federal, property-based subsidies: Public Housing and Multi-Family HUD-Assisted Housing.

Public Housing (shown in yellow) is affordable, rental housing owned and operated by the public housing authority, Lorain Metropolitan Housing Authority.

Multi-Family HUD-Assisted Housing (shown in red) is a subsidy for privately-owned, affordable, rental housing through one or more federal housing programs including:

- Section 8 Project-Based Rental Assistance: Unit-based subsidy to a private housing provider from HUD
- Section 8 Project-Based Vouchers: Unit-based subsidy to a private housing provider from the HCVP funding of a PHA (a PHA can designate up to 20% of its funding to project-based housing)
- Section 202: Supportive Housing for the Elderly (often in conjunction with Section 8 or 811)
- Section 811: Supportive Housing for People with Disabilities (often in conjunction with Section 8 or 202)
- Project Rental Assistance Contract (PRAC): payments made on behalf of very low-income tenants (usually in conjunction with 202 or 811)
- Rental Assistance Demonstration Program: a program that transitions public housing units into a Section-8-style model

Public and private housing providers using one of the above programs are often eligible for a variety of other subsidies as well as low-cost or federally-insured financing programs. Several properties receive LIHTC in addition to another property-based subsidy. In the following figure, these properties are only shown as a LIHTC property.

As shown in Figure 10, Multi-Family HUD-Assisted Housing is spread throughout the northern portion of Lorain County (City of Lorain having more Multi-Family Housing than Elyria) as well as in Oberlin and LaGrange. Public Housing units are nearly entirely concentrated in Lorain and Elyria, with several clusters in Oberlin. Lorain has the greatest concentration of public housing units. The majority of LIHTC properties are clustered in the cities of Lorain and Elyria with one cluster in Avon. Properties financed through the LIHTC Program are in close proximity to other property-based, subsidized rental housing, particularly in the Cities of Lorain and Elyria.

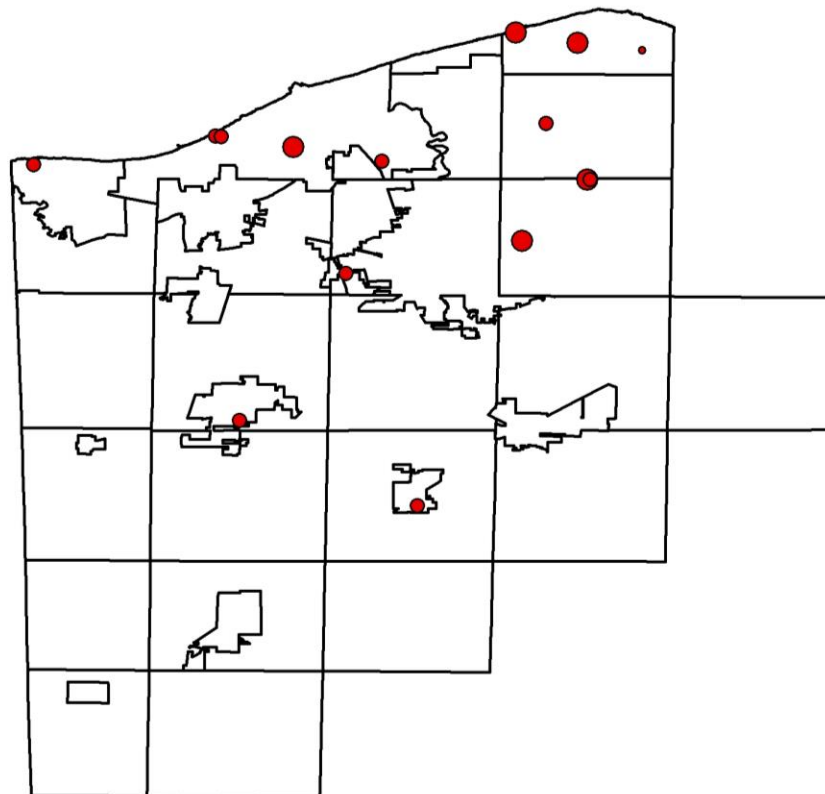
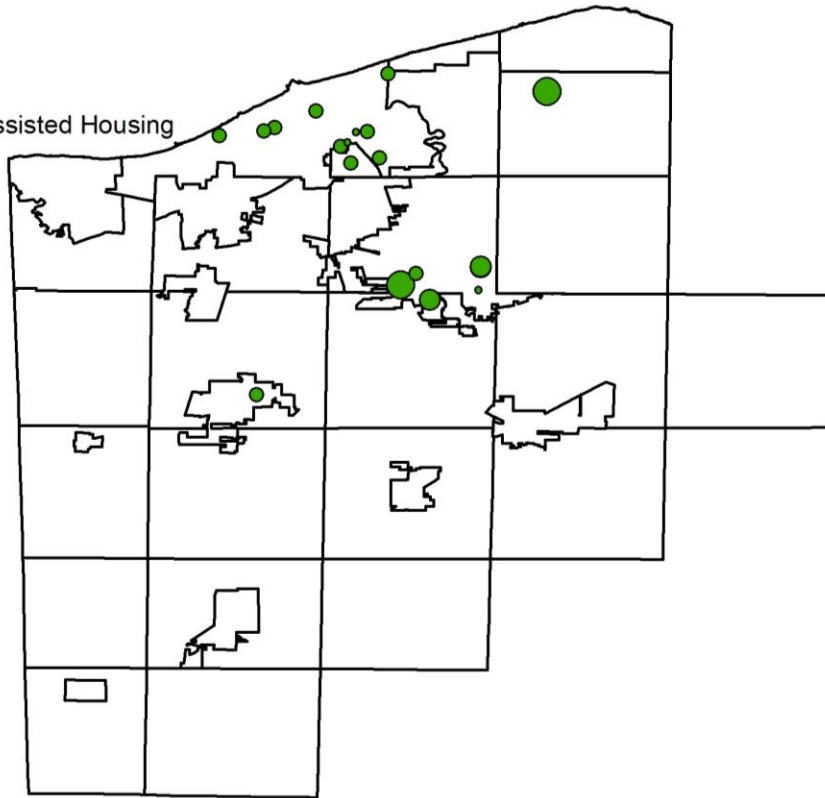
Figure 10: LIHTC Properties in Relation to Other Property-Based, Federally-Subsidized, Low-Income Housing in Lorain County

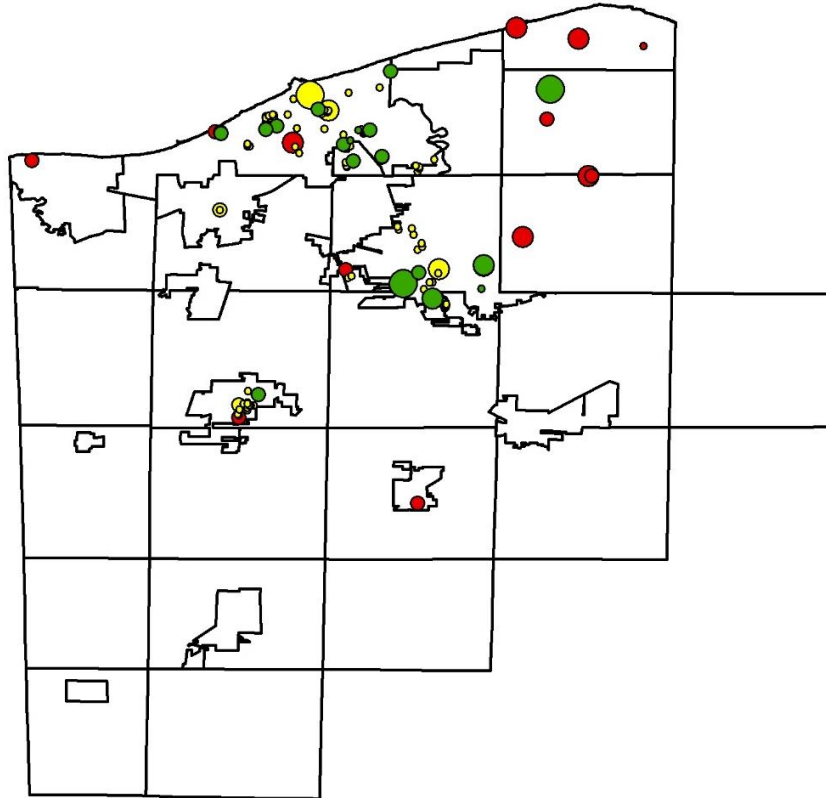
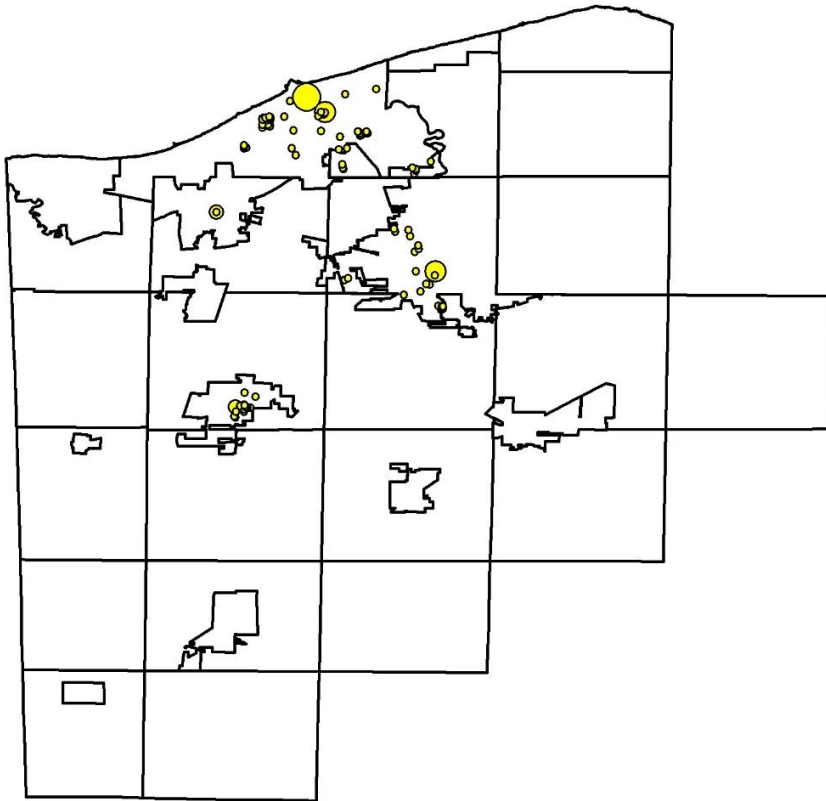
Housing Type

- LIHTC Total Units
- Public Housing
- Multi-Family HUD-Assisted Housing

Units Per Property

- 1 to 20
- 21 to 100
- 101 to 200
- 201 to 300





(Source: HUD eGIS)

2. Qualified Allocation Plans (QAPs) 2005-2016 Assessment

Following the 1986 Tax Reform Act establishing the LIHTC program, the Ohio Housing Finance Agency (OHFA) produces a yearly Qualified Allocation Plan (QAP), a planning document detailing the basis upon which OHFA awards Housing Tax Credits.⁵² For the purposes of this report, a ten-year review, 2005-2015, of QAPs was completed along with an assessment of the current 2016-2017 QAP, analyzing policy changes that promote placement of LIHTC communities outside of racially or poverty-concentrated neighborhoods or re-investment in these communities.

Each QAP outlines guidelines for tax credits to new affordable rental homes, rehabilitation of existing rental buildings, and permanent housing for the homeless, prioritizing extremely low-income households, as well as an affirmative fair housing marketing plan that highlights the ratio of all subsidized and housing credit unit rentals to the number of income-eligible renter households in each primary market area.⁵³ Over the course of the past ten years, there have been positive policy changes in the QAPs to promote greater opportunity for households living in LIHTC properties. In 2007, an additional section on site location and quality was added, emphasizing proximity of LIHTC developments to public and community services. A further item acknowledged was the effect of industrial, institutional, or other incompatible uses that could adversely affect residents and a requirement of a Phase 1 environmental review.⁵⁴ In 2009, additional items included in the site location section consist of potential development concerns (environmental hazards) related to increased noise levels, above ground storage tanks, wetlands, topography concerns, environmental injustices (such as overly concentrated low-income housing or otherwise undesirable location) and presence of health and safety issues.⁵⁵ The year 2010 marked the first year in which higher-opportunity areas were prioritized for LIHTC development; OHFA started valuing the development of affordable housing in areas within a qualified census tract, difficult development areas, areas of moderate, median and high income, and developing in new markets where no product development had been done previously. The 2010 QAP also outlines minimum development standards, setting square footage bedroom requirements; however, depending the municipal occupancy code in which the LIHTC property is built, this requirement could limit occupants and negatively impact larger households, particularly families with children, from accessing these units.⁵⁶ The year 2012 was the first year that incorporated prioritization of “green” developments.⁵⁷ From 2005 to 2011, each QAP required a public notification process to governmental officials, both local and state senators and representatives, and local approval from the local agency that administered the Consolidated Plan or Comprehensive Housing Improvement Strategy. As of 2012, only the public notification process was required.

In 2013, a new section, the basis boost, was added, emphasizing projects based not only in a qualified census tract, but also projects located in high-income census tracts and new construction projects located in HUD non-participating jurisdictions. That year, the market quality score also evaluated projects on the

⁵² Ohio Housing Finance Agency, *Qualified Allocation Plan 2015*, Available at: <https://ohiohome.org/lihtc/2015QAP-Final.pdf> (accessed January 11, 2015).

⁵³ Ohio Housing Finance Agency, *Qualified Allocation Plan 2015*, Available at: <https://ohiohome.org/compliance/QAP/05QAP.pdf> (accessed January 11, 2015).

⁵⁴ Ohio Housing Finance Agency, *Qualified Allocation Plan 2007*, Available at: <https://ohiohome.org/compliance/QAP/07QAP.pdf> (accessed January 11, 2015).

⁵⁵ Ohio Housing Finance Agency, *Qualified Allocation Plan 2009*, Available at: <https://ohiohome.org/compliance/QAP/09QAP.pdf> (accessed January 11, 2015).

⁵⁶ A qualified census tract is a tract having a poverty rate of at least 25% or in which at least half of the households have incomes that are less than 60% of the area median income.

⁵⁷ Ohio Housing Finance Agency, *Qualified Allocation Plan 2010*, Available at: <https://ohiohome.org/compliance/QAP/10QAP.pdf> (accessed January 11, 2015).

basis of positive site attributes and amenities to residents, local employment and economy factors, and minimal impact on existing LIHTC developments. In the 2013 QAP, points were awarded if a project received local approval from the state senator of the district, state representative of the district, mayor or majority of township trustees, majority of city or village council, and majority of county commissioners.⁵⁸

For the 2014 QAP, location-based characteristics were further developed, awarding points for proximity to positive land use or no detrimental land use. Positive land uses include retail, public services, and community facilities, while detrimental land use includes high levels of noise, noxious odors, and incompatible uses. Another 2014 QAP element of location-based characteristics was the awarding of points for family developments that are located in a non-QCT. The 2014 QAP, while requiring the public notification process, also awarded points for local support of proposed developments, which included a letter of support from either the mayor, city manager, a majority of township trustees, a majority of city or village council, or a majority of county commissioners. Legislator support from a state representative or senator also incurred positive points awarded. The 2014 QAP also designated points to a project if it included one of the following: a) a state-certified CHDO had 51% general partnership interest in ownership, b) a Metropolitan Housing Authority had 51% general partnership interest in ownership, or c) there was a commitment by local service providers to provide comprehensive services to residents.⁵⁹ Points were also awarded to proposals that were identified by the mayor, city manager, or the township administrator, as a priority development.⁶⁰

The 2015 QAP maintained the location-based characteristics set forth in the 2014 QAP and requirement for public notification as well as continuing the awarding of points for local support, legislator support, and if the project works with a CHDO, MHA, or local service providers. Both the 2014 and 2015 QAPs also included, in the exceptional development initiative, that economic development proposals must include non-housing investments and include housing for mixed incomes. The 2015 QAP designated a local development priority, however, only in new rental unit and existing rental unit projects in urban pools. In the 2015 QAP, the innovative housing pool included a priority in the policy area of family populations and opportunity, encouraging development to target low-income family populations by creating a strategy to help families transition out of poverty. New elements included in the 2015 QAP include a section detailing Housing Credit Gap Financing which considers projects utilizing HDAP funding together with Housing Tax Credits (which includes HOME funding and Ohio Housing Trust Fund funding). The 2015 QAP also included a requirement for a lead-based strategy for any projects that involve the demolition or renovation of structures built prior to 1978.⁶¹

The current 2016-2017 QAP includes a series of policy goals and additional rating criteria promoting opportunity for LIHTC communities. Policy goals include improving neighborhoods through community and economic development and advancing livability standards to promote healthy environments for residents. For the division of new unit production, this QAP includes a set-aside for family housing in high-opportunity areas and a set-aside for non-urban housing in low-population and mid-sized counties. Of particular note, the new QAP includes extra points for exceptional developments that contribute to local development, economic development, healthcare and workforce housing consideration, and educational and skills training opportunities for children and adults. While the 2016-2017 QAP requires public notification and a community outreach plan, it is the first QAP that does not award extra points for

⁵⁸ Ohio Housing Finance Agency, *Qualified Allocation Plan 2013*, Available at: <https://ohiohome.org/compliance/QAP/13QAP.pdf> (accessed January 11, 2015).

⁵⁹ A CHDO is a private nonprofit, community-based organization that has staff with the capacity to develop affordable housing for the community it serves.

⁶⁰ Ohio Housing Finance Agency, *Qualified Allocation Plan 2014*, Available at: <https://ohiohome.org/compliance/QAP/14QAP.pdf> (accessed January 11, 2015).

⁶¹ Ohio Housing Finance Agency, *Qualified Allocation Plan 2015*, Available at: <https://ohiohome.org/compliance/QAP/15QAP.pdf> (accessed January 25, 2017).

local support. The QAP also includes awards for community investment and economic development, wherein developments in all pools may earn points for investment or reinvestment activities implemented within a two-mile radius of the proposed development and developments can earn points for integrating land use and economic development strategies that will lead to economic investment in areas in need of revitalization. The QAP also awards additional points for family housing projects that are within the jurisdiction of a school with a school quality rating of B by the Ohio Department of Education or higher and projects that are designated in areas of moderate to high opportunity.⁶²

Existing literature shows that LIHTC units are generally located in neighborhoods that have poverty rates higher than the average for metropolitan areas; however, LIHTC neighborhoods have lower poverty rates than do neighborhoods in which public housing or other kinds of project-based, subsidized rental housing are located. According to the HUD study, *Effect of QAP Incentives on Location of LIHTC Properties*, QAPs do have a statistically significant impact on the location of tax credit developments: states that increased priorities in QAPs towards higher opportunity areas generally did show an increase in the share of tax credits allocated for low-poverty area projects.⁶³ The difference in the impact of changed QAP policies correlates strongly to the manner of implementation of the QAP policy changes.⁶⁴ The QAP provisions offer an opportunity to create a greater balance between high and low-income locations of LIHTC properties and limit those incentives that perpetuate a segregated geography of affordable housing.⁶⁵

⁶² Ohio Housing Finance Agency, *Qualified Allocation Plan 2016*, Available at: https://ohiohome.org/lihtc/2016-2017_QAP-Final.pdf (accessed January 11, 2015).

⁶³ U.S. Department of Housing & Urban Development, *Effect of QAP Incentives on Location of LIHTC Properties* Available at: http://www.huduser.gov/portal/publications/pdf/QAP_incentive_mdrt.pdf (accessed January 8, 2015).

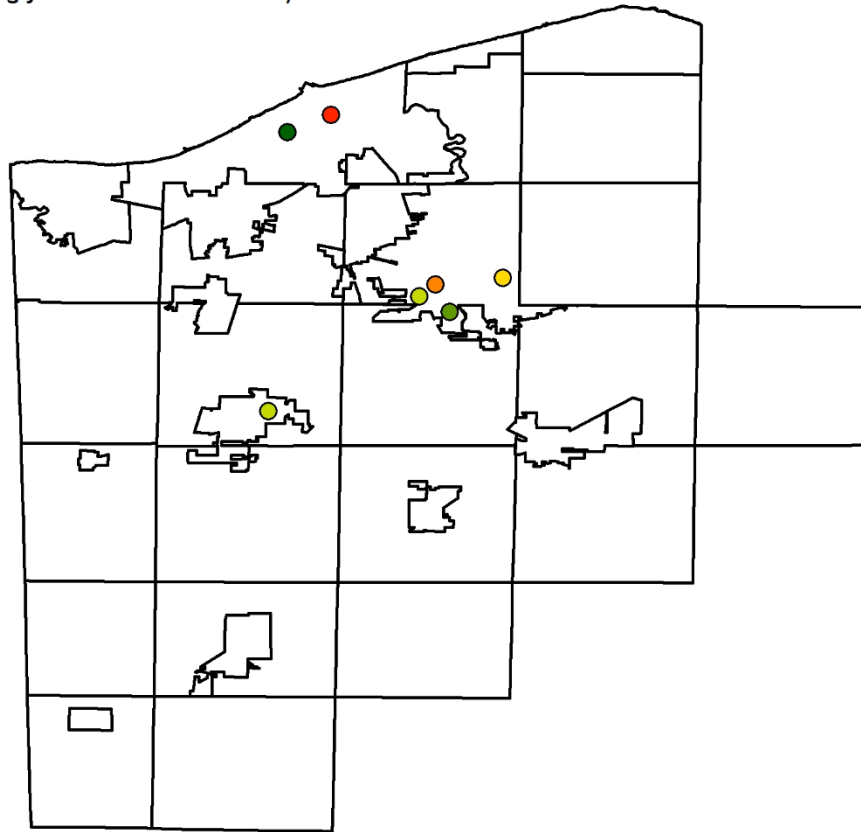
⁶⁴ Sarah Oppenheimer. *Building Opportunity II: Civil Rights Best Practices in the Low-Income Housing Tax Credit Program (2015 update)*, Poverty & Race Research Action Council, Available at: <http://www.prrac.org/pdf/2008-Best-Practices-final.pdf> (accessed January 11, 2016).

⁶⁵ Jill Khadduri, *Creating Balance in the Locations of LIHTC Developments: The Role of Qualified Allocation Plans*, Abt Associates Inc. (February 2013).

Figure 11: Yearly LIHTC Allocation from 2005-2013 in Lorain County

Year Tax Credit Allocated (missing years had no allocations)

- 2005
- 2007
- 2010
- 2011
- 2012
- 2013



(Source: HUD eGIS)

Beginning in 2007, the proximity to public and community services was acknowledged as important criteria for LIHTC construction, followed by development of protections against environmental hazards, green development, and prioritization of high-opportunity areas from 2009 to 2012. In recent years, QAPs have encouraged construction of LIHTC properties in high-income tracts and awarded positive scoring for projects offering positive site attributes, steady local employment, and proximity to positive land uses, such as retail and public and community services. The latest 2016-2017 QAP further develops these policy goals, encouraging healthy environments, community and economic development, and increased prioritization for construction in high-opportunity areas and high-income census tracts. Despite progress made in Ohio QAP policy language toward such de-concentration of LIHTC development in neighborhoods with concentrated racial-minorities or poverty, the implementation has been deficient. Over the period of the QAP analysis (2013 is the latest year for data) the majority of low-income housing tax credits were allocated to properties located in neighborhoods with high concentrations of racialized poverty (see Figures 8, 9, and 11).

V. VOUCHER HOUSEHOLDS AND OPPORTUNITY MAPPING

Opportunity mapping is a way to quantify, map, and visualize the opportunities that exist throughout neighborhoods, cities, regions, and states.⁶⁶ Areas of opportunity are defined, for the purposes of this report, as areas with low transportation cost, quality education, proximity to jobs, high labor market engagement, and high environmental quality. Access to opportunity or isolation from opportunity has critical implications for the ability of individuals to succeed or excel. Neighborhood quality plays a critical role in positive educational and employment outcomes for families.⁶⁷

This report's opportunity mapping measures the location and concentration of voucher holders in Lorain County against five indices used to determine which areas of the county are areas of greater or lesser opportunity. The five indices used are the following: low cost transportation index, labor market engagement index, jobs proximity index, environmental health hazard index, and school proficiency index.

A. Distribution of Voucher Holders

Voucher program participants are primarily located in the cities and surrounding townships of Lorain, Elyria, and Avon. These include Elyria Township, Sheffield Township, and Vermillion. The largest numbers (concentrations of multiple groups of 100-200 voucher holders per census tract) are in the City of Lorain. The City of Elyria has numerous pockets of 100 voucher holders per census tract throughout the city limits and Avon has one large concentration of 100-150 voucher holders. Less dense concentrations (groups of 25-50 and 1-25 per census tract) are located in Sheffield, Sheffield Lake, LaGrange, Wellington, Penfield Township, Oberlin, Amherst, and Carlisle.

B. Low Cost Transportation Index

The low cost transportation index is used to measure the cost of transportation in a neighborhood. The index measures from 0-100; the higher the low cost transportation number, the lower the cost of transportation in the neighborhood. Transportation costs could be low due to greater access to public transit as well as the density of homes, jobs, and services in a given community.⁶⁸

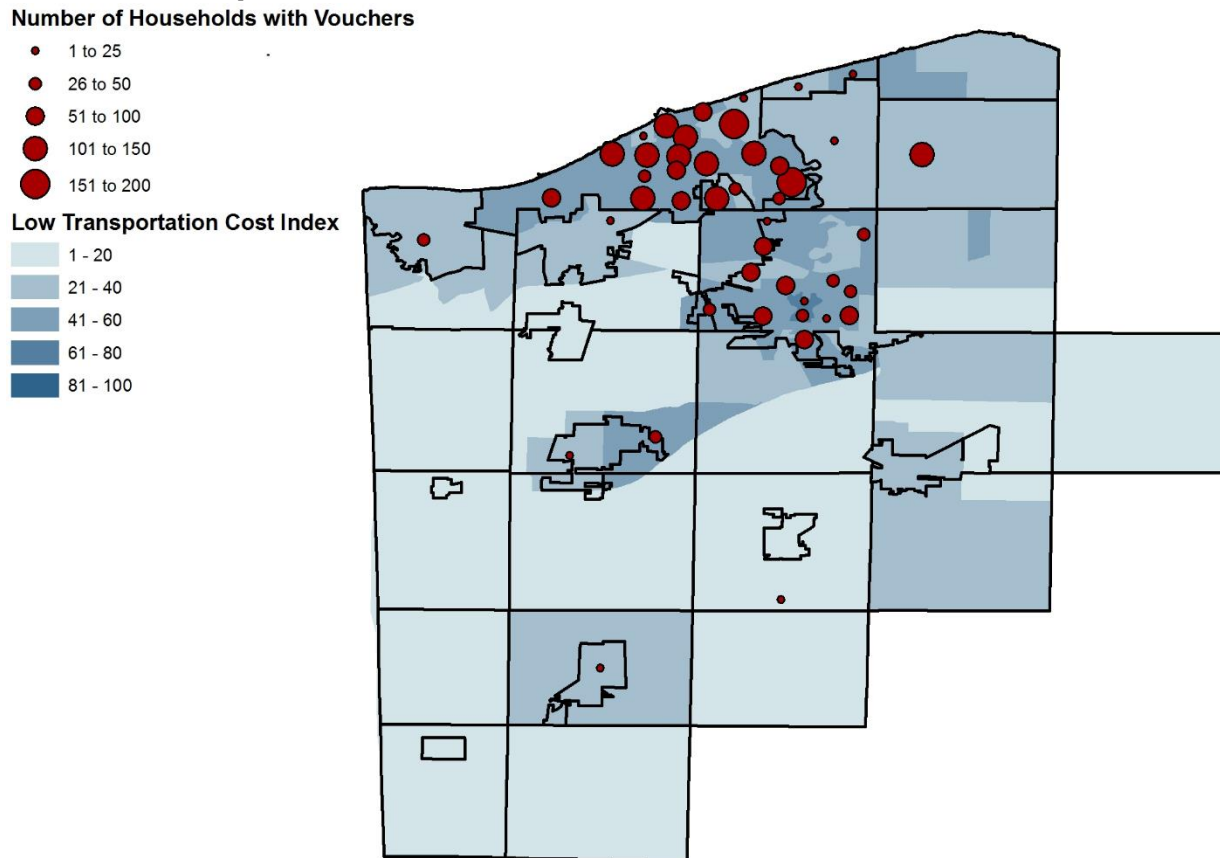
The low cost transportation (LCT) index score is higher in those areas where the majority of voucher holders live, primarily in more urban areas of the county, particularly Lorain and Elyria. This means that the cost of transit is low for voucher holders living in these areas (see Figure 12). This is a positive feature for voucher holders as the lower transit costs enable a greater percentage of income to be spent on basic needs such as housing, food, education, and healthcare. Those areas with a very low LCT index score and therefore, a higher cost of transit, are largely avoided by voucher holders with the exception of a small group of vouchers in LaGrange. Those northern districts of the county bordering Cuyahoga County have fairly high LCT index scores, whereas more rural southwestern districts which generally have little to no voucher holders present have very low scores (with the exception of Oberlin, Wellington and Penfield).

⁶⁶ Ohio Housing Finance Agency, *OHFA Opportunity Mapping Profiles and Change Index Brief*, Kirwan Institute for the Study of Race and Ethnicity, The Ohio State University, <https://www.ohiohome.org/lihtc/OpportunityMappingProfilesBrief.pdf> (accessed December 7, 2015).

⁶⁷ Jason Reece, Samir Gambhir, Jillian Olinger, Matthew Martin, and Mark Harris, *People, Place and Opportunity: Mapping Communities of Opportunity in Connecticut*, Kirwan Institute for the Study of Race and Ethnicity, Ohio State University (November 2009).

⁶⁸ U.S. Department of Housing and Urban Development, *Low Transportation Cost Index*, http://egis.hud.opendata.arcgis.com/datasets/154f5e23fd7248a99b97fa92adc81b6c_o (accessed December 11, 2015).

Figure 12: Low Cost Transportation Index and Housing Vouchers by Census Tract in Lorain County, 2013



(Source: HUD eGIS)

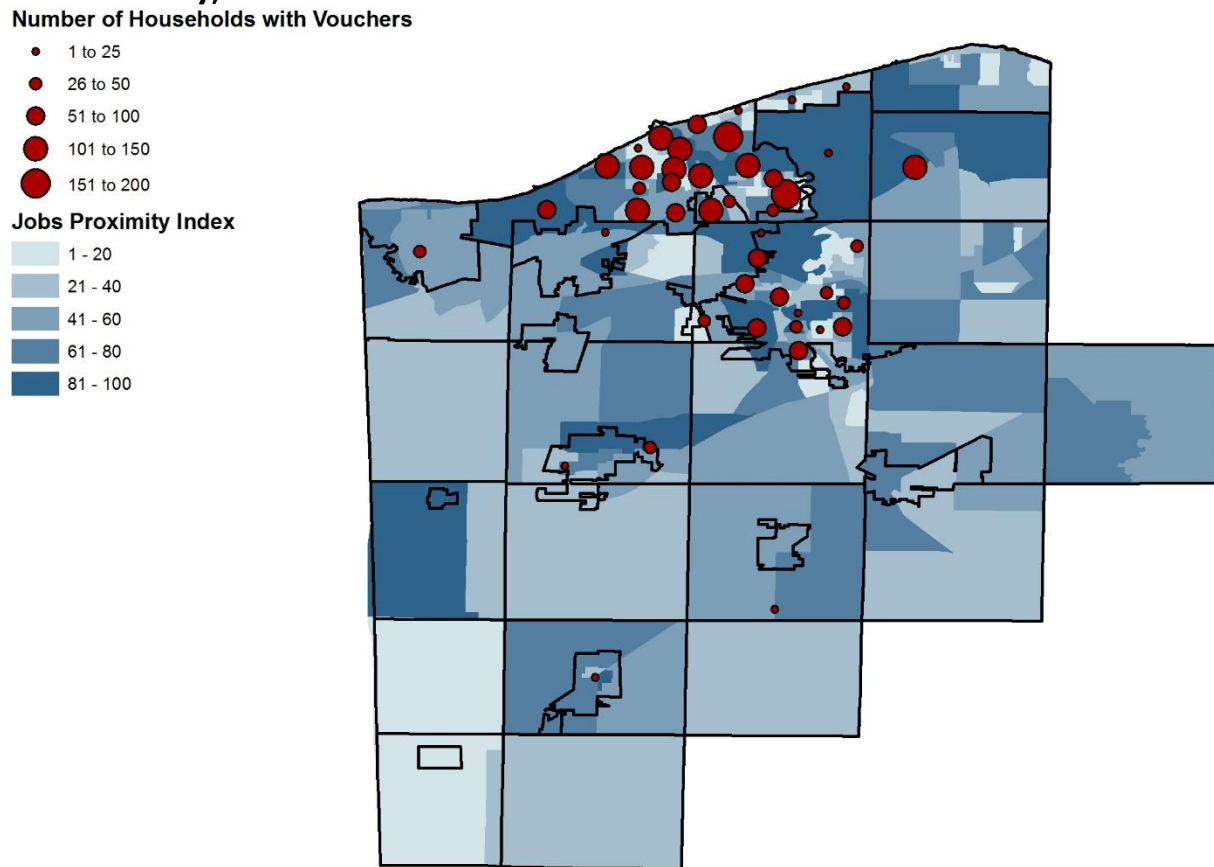
C. Jobs Proximity Index

The jobs proximity index is used to quantify the accessibility of a residential neighborhood as a function of its distance to all job locations within a Core Based Statistical Area. The index measures from 0 to 100: the higher the index value, the better the access to employment (see Figure 13).⁶⁹

Voucher holders are most concentrated in the City of Lorain. Within Lorain, voucher holders are located in areas having a low to median jobs proximity index score, meaning voucher holders have moderate access to jobs. They tend to border areas with high scores on the index, offering the potential to better access jobs. The City of Elyria follows a similar pattern in which the larger concentrations of voucher holders are located in areas of moderate access to jobs, bordering areas with high jobs proximity index scores and thus greater access to jobs. Voucher holders in Vermillion, Oberlin, Wellington, LaGrange, Sheffield, and Avon continue this pattern of participants living in relatively moderate job access areas bordering higher job access locations.

⁶⁹ U.S. Department of Housing and Urban Development, *Jobs Proximity Index*, http://egis.hud.opendata.arcgis.com/datasets/b048bdd2e6064deca6eda4196d071aa2_0 (accessed October 4, 2016).

Figure 13: Jobs Proximity Index and Housing Choice Vouchers by Census Tract in Lorain County, 2013



(Source: HUD eGIS)

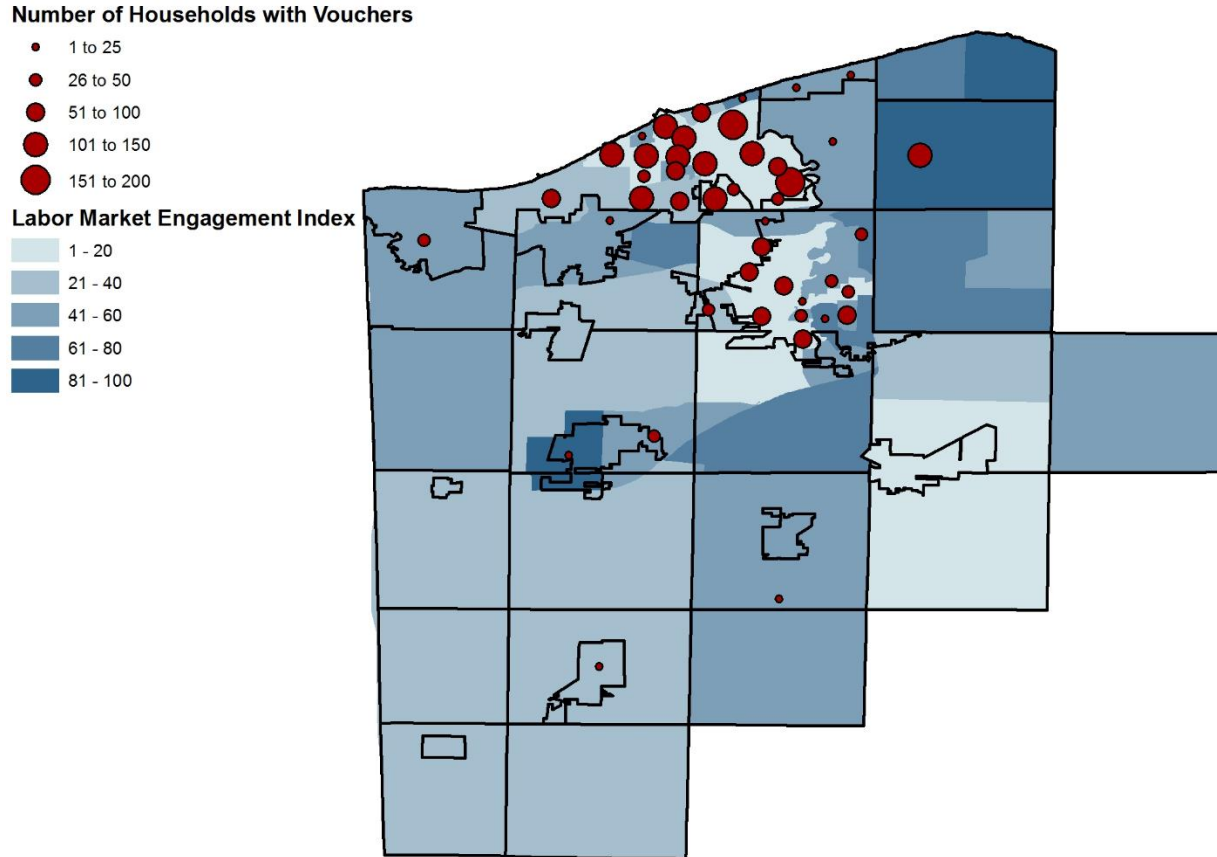
D. Labor Market Engagement Index

The labor market engagement (LME) index is a description of the relative intensity of labor market engagement and human capital. This is based upon the level of employment, labor force participation, and educational attainment in a census tract. Rated on a scale from 0 to 100, the higher the index score, the higher the labor force participation and human capital in that neighborhood.⁷⁰

Within the City of Lorain, the majority of voucher holders live in neighborhoods with the lowest labor market engagement scores, meaning there is low labor force participation and human capital within the neighborhoods in which they are located. In both Lorain and Elyria, the majority of voucher holder concentrations are located in areas of low scores on the LME index; with the exception of the cluster in Avon, the largest concentrations of voucher holders are in areas with the lowest LME scores. Smaller clusters in Oberlin, Vermillion, Sheffield, LaGrange, and Wellington are located in areas with moderate LME index scores, meaning areas with higher labor force participation and human capital.

⁷⁰ U.S. Department of Housing and Urban Development. *Labor Market Engagement Index*, Available at: http://egis.hud.opendata.arcgis.com/datasets/4cb7f61e90b84fe5a208d8ea587d11f3_o (accessed December 11, 2015).

Figure 14: Labor Market Engagement Index and Housing Choice Vouchers by Census Tract in Lorain County, 2013



(Source: HUD eGIS)

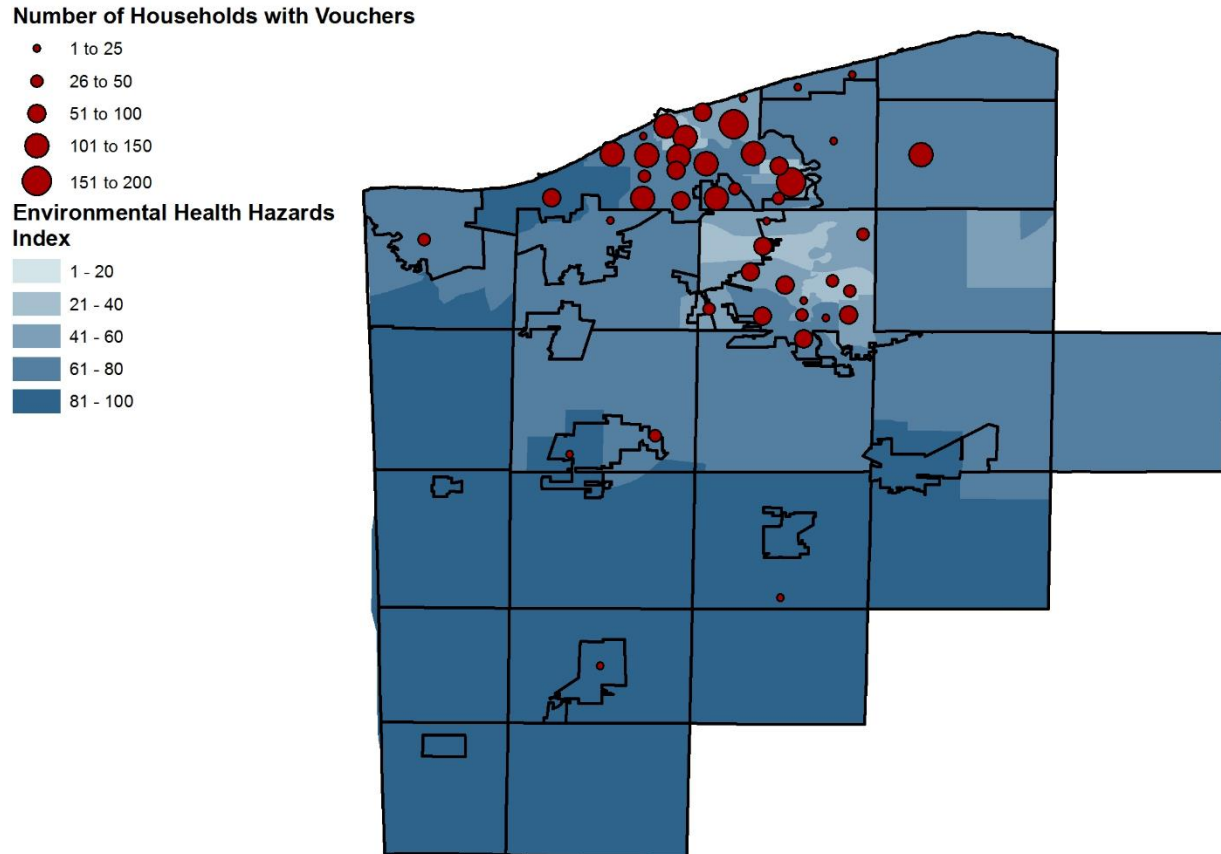
E. Environmental Health Hazard Index

The environmental health hazard (EHH) index summarizes the potential exposure to toxins that are harmful to human health at the neighborhood level. The environmental health hazard exposure index measures air quality in terms of carcinogenic, respiratory, and neurological hazards. The index is measured on a scale from 0 to 100; the higher the value, the less exposure to toxins harmful to human health and the better the environmental quality of the neighborhood.⁷¹

Lorain County ranges from areas of moderate scores (21-40, 41-60) on the EHH index to very high EHH scores. The highest scores are located in the southern and western districts of the county, meaning these areas have significantly less exposure to harmful toxins and greater neighborhood environmental quality. The lowest scores in the county (at 21-40) are located in the cities of Lorain and Elyria, which are also home to the largest concentrations of voucher holders, particularly Lorain. This means that the largest numbers of voucher holders are located in the areas of the county with lower environmental neighborhood quality and greater exposure to harmful toxins. There are small clusters of voucher holders in Avon, Oberlin, western Lorain, LaGrange, and Wellington that live in areas of high EHH scores, meaning better environmental neighborhood quality.

⁷¹ U.S. Department of Housing and Urban Development. *Environmental Health Hazard Index*, Available at: http://egis.hud.opendata.arcgis.com/datasets/53a856bef6f24356abee30653399e94a_0 (accessed December 11, 2015).

Figure 15: Environmental Health Hazard Index and Housing Choice Vouchers by Census Tract in Lorain County, 2013



(Source: HUD eGIS)

F. School Proficiency Index

The school proficiency index utilizes data from fourth grade students' state math and reading exams to describe which neighborhoods have high-performing elementary schools and which areas have low-performing elementary schools. The index scores range from 0 to 100: the higher the score, the better the school system quality in that neighborhood.⁷²

In the City of Lorain, voucher holders live in large concentrations in neighborhoods with the lowest school proficiency index scores. A large cluster of voucher holders in Lorain live in areas with low-to-moderate scores on the school proficiency index. Elyria continues this trend on a smaller scale, as numerous clusters of voucher holders live in areas with lower school quality (in the moderate school proficiency index range). The best districts with high quality schools are Avon Lake, Avon, and Columbia; the North Ridgeville, Henrietta, Camden, LaGrange, Penfield, and Wellington areas have moderate-to-high school proficiency scores. The latter three districts are also home to a small number of voucher holders. Those voucher program participants living in Vermillion, Sheffield, and Sheffield Lake are in areas of moderate school proficiency scores. Those living in Oberlin are in a moderate-to-low school proficiency index range. Overall, the majority of voucher holders live in neighborhoods with lower school quality.

⁷² U.S. Department of Housing and Urban Development. *School Proficiency Index*, Available at: http://egis.hud.opendata.arcgis.com/datasets/70e2ed8dcb6c47ffa3414c275f62b72b_0 (accessed December 11, 2015).

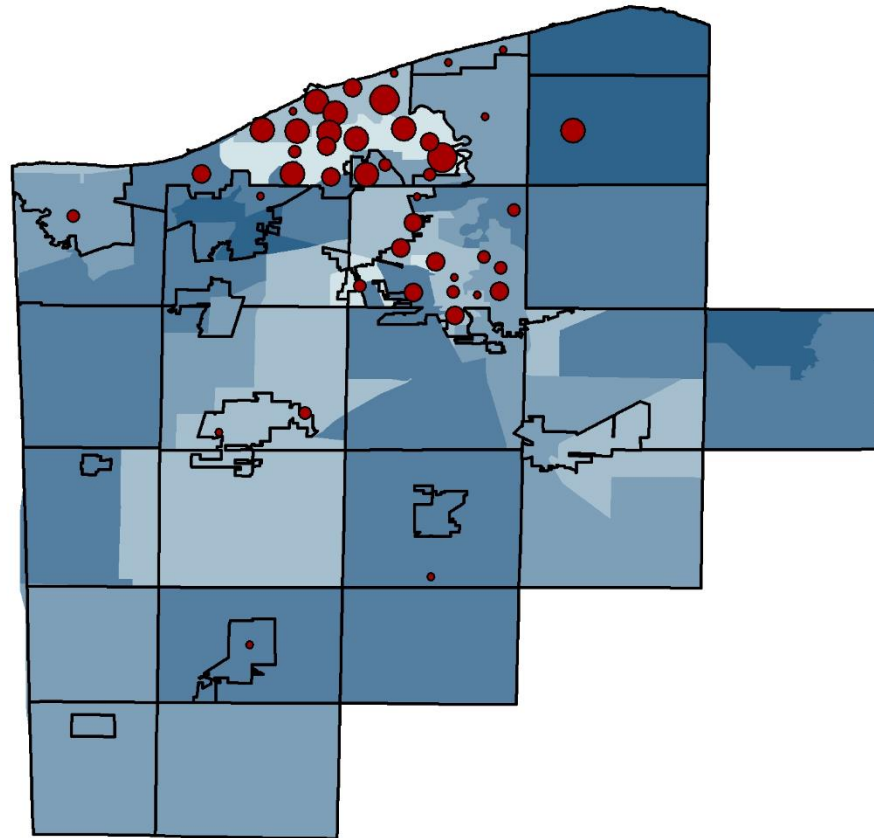
Figure 16: School Proficiency Index and Housing Choice Vouchers by Census Tract in Lorain County, 2013

Number of Households with Vouchers

- 1 to 25
- 26 to 50
- 51 to 100
- 101 to 150
- 151 to 200

School Proficiency Index

- 1 - 20
- 21 - 40
- 41 - 60
- 61 - 80
- 81 - 100



(Source: HUD eGIS)

G. Opportunity Mapping Conclusions

Based upon the evaluation of the five indices described above, voucher holders tend to live in more disadvantaged areas with less access to opportunity. While voucher holders are dispersed throughout Lorain County, the majority live in the cities of Lorain and Elyria. Both of these areas scored poorly on nearly all indices, except for the low cost transportation index. Large concentrations of voucher holders live in areas with limited access to jobs, low labor market engagement, greater exposure to environmental hazards, and lower quality schools. Living in areas of greater disadvantage limits the ability of voucher holders to access opportunity and improve quality of life.

VI. SURVEY FINDINGS

A. Survey Methodology

The Housing Center distributed surveys to households using housing vouchers via mail (see Appendix for survey). With the assistance of LMHA, 1,000 paper surveys were mailed to households using vouchers, nearly one-third of the participants served by LMHA. Of those that received the survey, 51 participants (5.1%) responded to the survey.

All data presented and analyzed in this section of the report through graphical representations is The Housing Center survey data. In this report, individual comments were selected when they were indicative of trends noted in the analysis of the surveys.

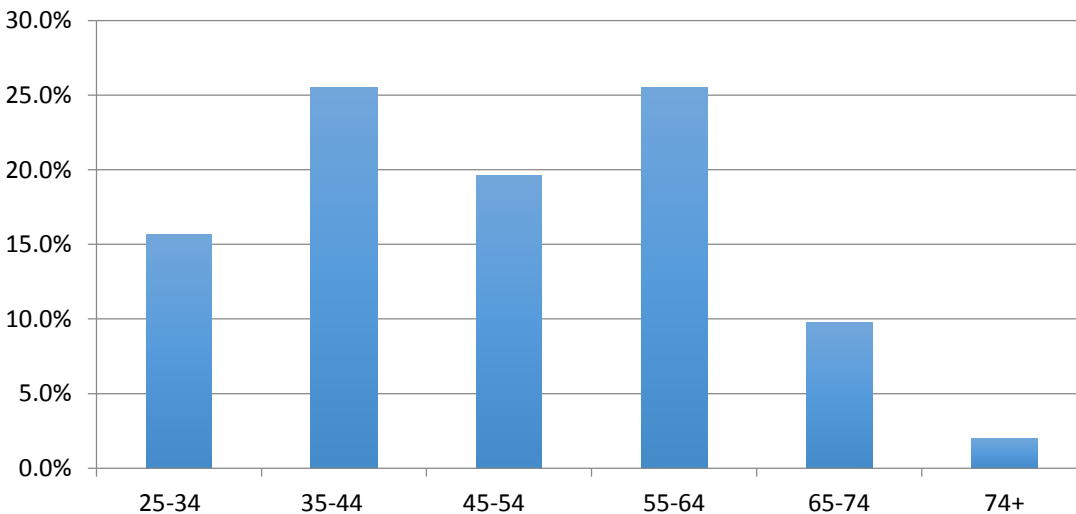
B. Analysis of Voucher Holder Surveys

1. Demographic Information

There are a total of 3,069 households in the LMHA Housing Choice Voucher Program. Of the households, 44.2% have disabled heads of household, 15.2% have elderly heads of household, and 82.3% have female heads of household. White voucher households make up 57.9% of participating households, while African American households comprise 39.2% and Hispanics/Latinos, 24.4%. Families with children make up 45% of households in the LMHA HCVP.⁷³

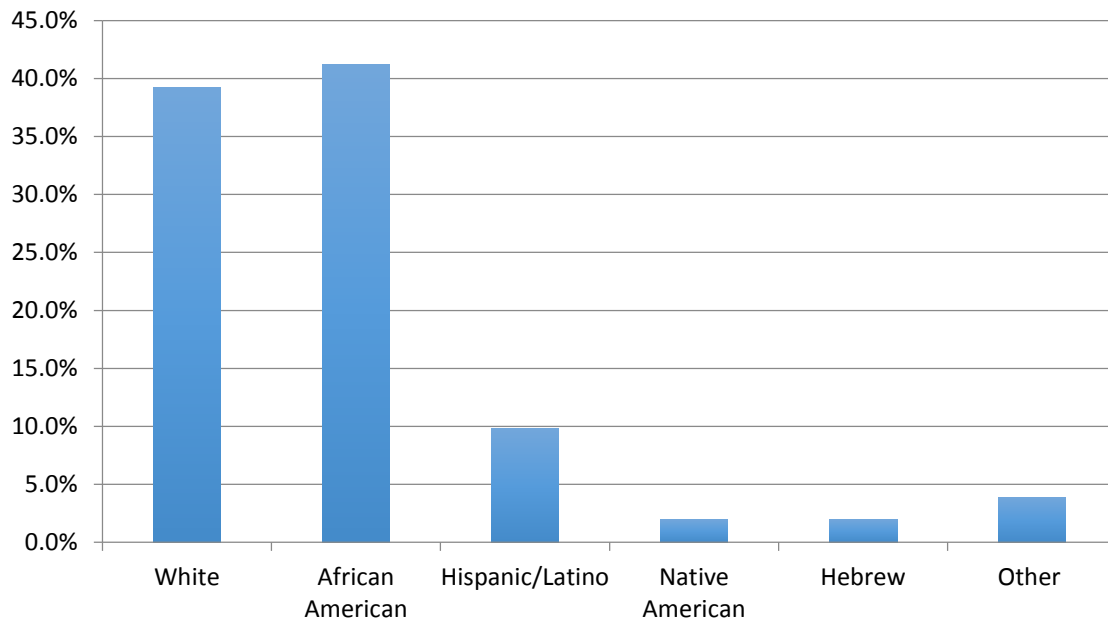
Of the 51 households who responded to the survey, 45.1% are disabled heads of household and 74.5% are female heads of households. Households with children under 18 represent 45.1% of households. White households make up 39.2% of households who responded to the survey; African American households comprise 41.2% and Hispanics/Latinos, 9.8% (see Figure 18). Families with children make up 45.1% of households surveyed; 15.7% of total households have children ages 0-4 and 37.3% have children ages 5-17. Voucher heads of households who responded to the survey are largely in the age group of 55-64 (25.5%) and 35-44 (25.5%) though closely distributed amongst 25-34 (15.7%) and 45-54 (19.6%) (see Figure 17).

Figure 17: Age of Respondents



⁷³ Lorain Metropolitan Housing Authority, Streamlined Annual PHA Plan 2016, available at: <http://www.lmha.org/about-lmha/annual-reports/>

Figure 18: Race of Respondents



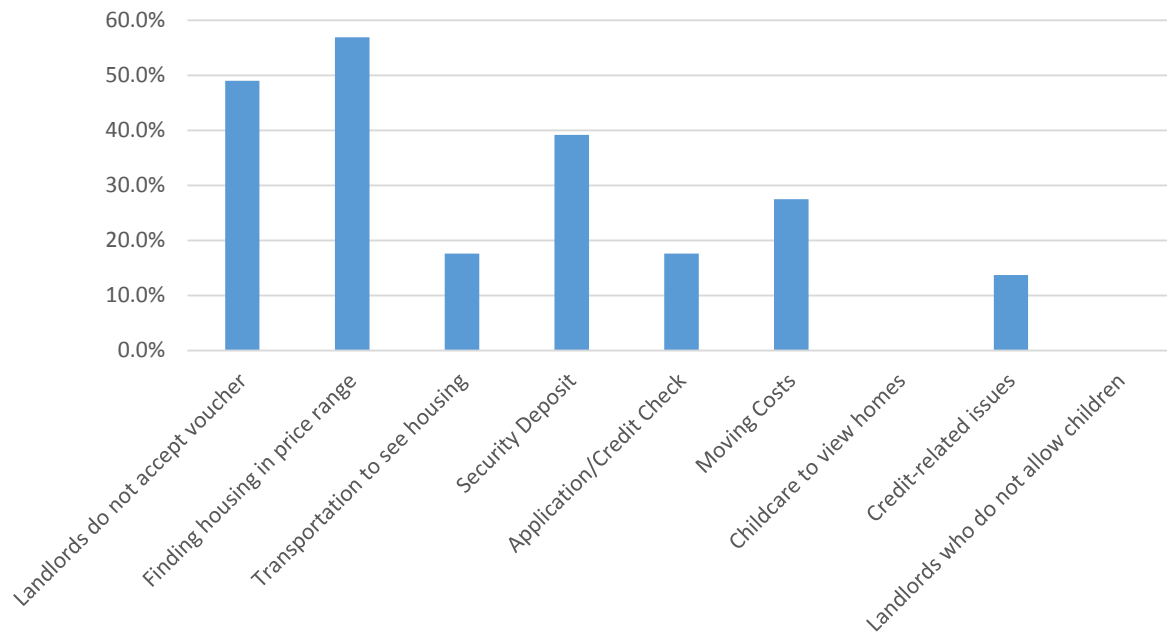
2. Challenges to Finding Housing

The most significant reported challenge to finding housing for voucher holders is finding housing in their price range; 56.9% cited this issue. Forty-nine percent of voucher holders report that landlords do not accept vouchers. Paying the security deposit (39.2%) and moving costs (27.5%) are also identified as challenges to securing housing with a voucher (see Table 3 and Figure 19). One respondent commented that it was a challenge to find a home large enough for the household. Four respondents commented that they faced no challenges.

Table 3: Challenges Faced by Voucher Holders

Challenge	Participants Encountering Challenge	Proportion of Participants
Landlords do not accept voucher	25/51	49.0%
Finding housing in price range	29/51	56.9%
Transportation to see housing	9/51	17.6%
Security Deposit	20/51	39.2%
Application/Credit Check	9/51	17.6%
Moving Costs	14/51	27.5%
Childcare to view homes	0/51	0.0%
Credit-related issues	7/51	13.7%
Landlords who do not allow children	0/51	0.0%

Figure 19: Challenges Faced by Voucher Holders



3. Motivations for Moving

Of those who replied to the survey, voucher holders live either in Lorain (43.1%) or Elyria (56.9%). Forty-nine percent previously had lived in Elyria, 27.5% in Lorain, 5.9% in Cleveland, and a few in North Olmsted, Avon, Oberlin, and Columbia Station. Many voucher holders had been at their current address for either 4 to 6 years or 1 to 3 years (27.5% each). Forty-three percent had never moved with their voucher, though 21.6% had moved once. Respondents shared various motivations for moving:

- “Better place to live for my kids”
- “Move closer to family”
- “Needed a bigger place”
- “Wanted to be closer to high school”
- “First move, wanted a smaller house. The second two times the landlord lost the house”
- “Program and landlord let older people renters go because of money. Landlord told me no dogs. Landlord changed deposit for apartment”
- “Area, drugs, loud, traffic in and out, same everywhere moved; landlords don’t care, just care about money”
- “Delinquency, gossip, harassment, and the most important, a lot of drug trafficking and nobody do nothing, even police”
- “Closer to shopping centers”
- “I received my voucher and moved from the scattered housing program”
- “Needed more space, wanted to not be on a busy road, disliked lack of cleanliness of neighbors”
- “Closer to work (without reliable working vehicle)”
- “Better Neighborhood”

4. Housing Discrimination

Of the survey respondents, 6 of 51 (11.8%) report having experienced housing discrimination. Of the six, the majority experienced racial discrimination (66.7%), followed by religion (50%), national origin (33.3%), and disability (33.3%). Further protected classes cited by participants as areas of discrimination were having been a victim of domestic violence (16.7%), sexual orientation (16.7%), and having a voucher (16.7%). In relation to the entire group surveyed (51 participants), 7.8% of participants encountered racial discrimination (see Table 4, Table 5, and Figure 20).

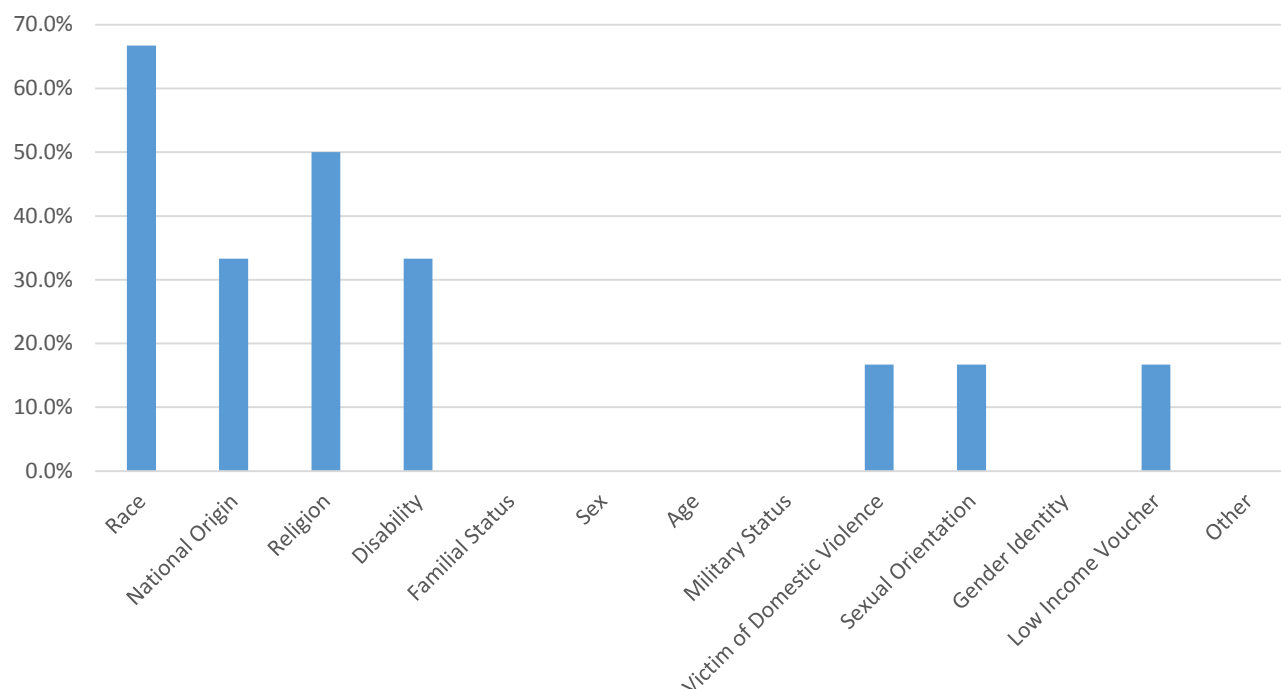
Table 4: Housing Discrimination Experienced by Voucher Holders

Experienced Discrimination	Participants who encountered discrimination	Proportion of Total (51)
Yes	6	11.8%
No	42	82.4%
No Response	3	5.9%

Table 5: Types of Discrimination

Type of Discrimination	Participants Encountering Discrimination	Proportion of Those Who Experienced Discrimination (6)	Proportion of total (51)
Race	4	66.7%	7.8%
National Origin	2	33.3%	3.9%
Religion	3	50.0%	5.9%
Disability	2	33.3%	3.9%
Familial Status	0	0.0%	0%
Sex	0	0.0%	0%
Age	0	0.0%	0%
Military Status	0	0.0%	0%
Victim of Domestic Violence	1	16.7%	2.0%
Sexual Orientation	1	16.7%	2.0%
Gender Identity	0	0.0%	0%
Low Income Voucher	1	16.7%	2.0%
Other	0	0.0%	0%

Figure 20: Types of Discrimination Experienced by Voucher Holders



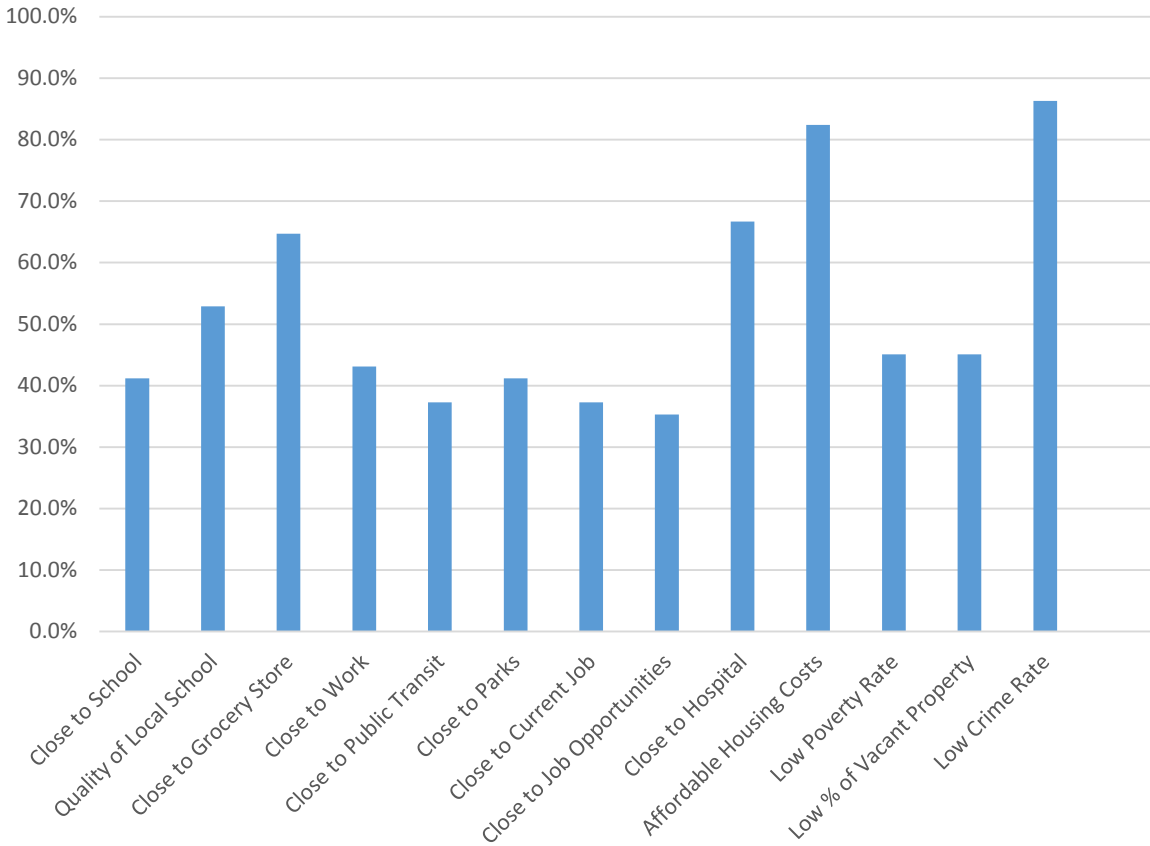
5. Choice of Neighborhood: Important Factors When Looking for Housing

Participants rated those factors that are of most importance to them when looking for housing based on a scale of 1-5, five being most important and one being least important. The analysis in Table 6 considers participants that gave a rating of 4 or 5 for each housing factor. The most highly rated factors are as follows: low crime rate in the neighborhood (86.3%), affordable housing (82.4%), close proximity to the hospital (66.7%), close proximity to the grocery store (64.7%), and the quality of the local school (52.9%).

Table 6: Factors Important to Voucher Holders When Seeking Housing

Housing Factor	Participants who rated factor as important	Proportion of total (51)
Close to school	21	41.2%
Quality of local school	27	52.9%
Close to grocery store	33	64.7%
Close to work	22	43.1%
Close to public transit	19	37.3%
Close to parks	21	41.2%
Close to current job	19	37.3%
Close to job opportunities	18	35.3%
Close to hospital	34	66.7%
Affordable housing costs	42	82.4%
Low poverty rate	23	45.1%
Low percentage of vacant property	23	45.1%
Low crime rate	44	86.3%

Figure 21: Factors Important to Voucher Holders When Seeking Housing



VII. CONCLUSIONS AND RECOMMENDATIONS

Housing mobility for participants of the housing choice voucher program in Lorain County is low. Many households using vouchers are living in racially segregated neighborhoods with high rates of poverty and low performing schools. When surveyed, many voucher program participants reported that they did not want to live in neighborhoods with these challenges. Eighty-six percent of respondents said they want to live in neighborhoods with low crime, 52.9% stated the quality of area schools is important to them, and 45.1% stated that they want to live in areas with low poverty rates. Voucher participants reported several motivations for moving; among these were moving to a better neighborhood, a better place to raise children, closer to school options, and to escape areas of crime and drug trafficking.

Respondents reported that affordable housing is an important factor in seeking housing (82.4%). The greatest reported challenge to securing housing is locating units within the price range that the voucher holder could afford (56.9%). Lorain Metropolitan Housing Authority provides voucher payments based on the 40th percentile of rents charged for standard rental housing. The LMHA payment standard places the voucher holder in the mid-range of rental costs in the county, meaning voucher holders may be priced out of quality rental units in better neighborhoods that are priced at the high end of rents. The U.S. Department of Housing and Urban Development sets Fair Market Rent (FMR) for regions across the country. FMR determines the buying power of a housing voucher with some allowance for flexibility for local housing authorities.

- **Maintain the usable value of the voucher based on Small Area Fair Market Rent** as opposed to the uniform standard for an entire metropolitan area. This takes into account the varying costs of living and housing markets within a metropolitan area and allows voucher holders greater housing choice and greater voucher buying power.

Moving costs and having the ability to put down a security deposit are other significant factors reported by voucher holders. Thirty-nine percent of voucher program participants reported struggling to pay the security deposit and 27.5% cited moving costs as an additional challenge. While HCVP provides a housing subsidy to eligible families, this subsidy covers only the monthly rent portion, excluding the security deposit, which is normally equal to first month's rent. Therefore, the household is forced to come up with the security deposit on their own which could be outside the budget of the household. This requires savings on the part of the household, a challenge for already struggling low-income households.

- **Implement a funding program for moving costs and security deposit assistance.**

The Low-Income Housing Tax Credit Program (LIHTC) could be used to increase mobility for all low-income residents of Lorain County, including those using housing vouchers. As a condition of using LIHTC to finance properties, housing providers must agree to accept vouchers. LIHTC developments in Lorain County have been predominantly concentrated in the same areas of the county where voucher holders are already living. Most LIHTC properties in Lorain County are in areas with concentrated, racialized poverty, with low opportunities, and are close in proximity to other subsidized housing, particularly in the cities of Lorain and Elyria. LIHTC properties are approved by the Ohio Housing Finance Agency (OHFA) according to priorities set by OHFA in the 2-year Qualified Allocation Plan.

- **Promote integration and combat segregation through the development of affordable housing in areas of opportunity through the construction of LIHTC units in low-poverty neighborhoods.** LIHTC units can improve mobility of voucher holders and low-income households when they are placed in areas of high opportunity.

The second highest reported challenge by voucher program participants to securing housing is that many landlords do not accept vouchers (49.0%). Landlords play a pivotal role in the success of the voucher program. To expand the housing choice of voucher holders to areas of greater opportunity, landlords in high-opportunity neighborhoods are critical actors.

- **Offer technical assistance for landlords and streamline the administrative process for landlords participating in the voucher program.** Delays reduce the financial incentive for landlords to accept vouchers, having the effect of reducing housing available to voucher holders.
- **Market the Housing Choice Voucher Program to landlords in high-opportunity neighborhoods.** Many landlords are unaware of the program or have negative perceptions of the voucher program.
- **Strengthen PHA support of voucher holders:**
 - Offer **mobility counseling** services both pre-move and post-move.
 - Provide **technical assistance** to voucher program participants in the search for housing.

Though not explored in this study, refusing to rent to a voucher holder could be a pretext for discrimination based on protected classes, such as race, national origin, religion, and disability. Refusal to accept vouchers could be used as a proxy for illegal forms of housing discrimination. The rejection of voucher holders may disparately impact people belonging to FHA protected classes by limiting their choice of housing and neighborhood as well as contributing to increased segregation of members of a protected class. Just over half of respondents reported the challenge of landlords that do not accept vouchers. Of those that reported having experienced discrimination, the largest percentage cited discrimination based upon race, followed by religion, disability, and national origin.

- **Support source of income protection in municipalities.** Source of income refers to a legal and verifiable income that is paid directly to the tenant or his or her representative (e.g. social security, SSI, veteran's benefits, and wages).⁷⁴ If source of income is established as a fair housing protected class, it would include government assistance, such as the HCVP subsidy. This protection would prevent housing discrimination against voucher holders, a significant challenge to finding affordable housing in this study.⁷⁵
- **Ensure all voucher participants are informed of their fair housing rights at mover briefing sessions.**

The Housing Choice Voucher Program, as well as other affordable housing programs, could be used as tools to promote diverse communities and eliminate segregation in Lorain County. While these recommendations are broad and will require investment of time and resources, The Housing Center believes that they will strengthen affordable housing in our region and benefit the entire community, making our region not only more just and equitable but economically stronger.

⁷⁴ Lance Freeman. Columbia University for U.S. Department of Housing and Urban Development, *The Impact of Source of Income Laws on Voucher Utilization and Locational Outcomes*, Available at: https://www.huduser.gov/publications/pdf/Freeman_ImpactLaws_AssistedHousingRCR06.pdf (accessed January 11, 2016).

Appendix: Survey



Voucher Participant

The Housing Research & Advocacy Center is conducting a study in Lorain County to better understand the choices people make about housing. The survey is completely voluntary. The data from these surveys will be compiled and used for a public report about housing mobility in the county. The report will also be provided to the local housing authorities as a resource for use in strengthening their voucher programs and maximizing the positive impact on the lives of program participants.

Please complete survey and return using the included envelope. Thank you!

Please check all that apply:

- I am the head of my household.
- I am a person with a disability. A person with a disability lives in my household.
- Children under 18 live in my household. If so, how many? _____
 - Children between the ages of 0 and 4 live in my household.
 - Children between the ages of 5 and 17 live in my household.

I am:

Sex: Female Male

Age: 18-24 years old 25-34 years old 35-44 years old 45-54 years old
 55-64 years old 65-74 years old 75 years or older

Race: African American White Hispanic/Latino Asian American
 Native American Arab American Other _____

How many people live in your household? (Please give number) _____

What is your current ZIP code? _____

What was your ZIP code before receiving a housing voucher? _____

How many years have you lived at your current address? _____

How many times have you moved while using a voucher? _____

What was your motivation for moving? _____

What have been some challenges to finding housing? (Please check all that apply)

- Landlords who do not accept vouchers
- Finding housing in my price range
- Transportation to see housing unit(s) I would like to rent
- Security Deposit
- Application and/or Credit Check Fees
- Moving Costs
- Childcare while looking for housing
- Credit-related issues
- Landlords who say they don't allow children. Please explain: _____
- Other Reason(s) _____

Do you feel that you have experienced housing discrimination while looking for housing?

- Yes No

If YES, why do you think you were discriminated against? (Please check all that apply)

- Race/Color
- National Origin/Ancestry
- Religion
- Disability
- Familial Status (presence of children under 18 in your home)
- Sex
- Age
- Past/Current Status as a Victim of Domestic Violence
- Sexual Orientation
- Gender Identity
- Military Status
- Other _____

Please briefly explain any boxes you checked: _____

Please rank the importance of the following when looking for housing:

	Not Very Important —————→ Very Important				
	1	2	3	4	5
Close to school	1	2	3	4	5
Quality of the local school	1	2	3	4	5
Close to grocery store	1	2	3	4	5
Close to work	1	2	3	4	5
Close to public transportation	1	2	3	4	5
Close to parks and open spaces	1	2	3	4	5
Close to current job	1	2	3	4	5
Close to job opportunities	1	2	3	4	5
Close to hospital/health care	1	2	3	4	5
Affordable housing costs	1	2	3	4	5
Low poverty rate	1	2	3	4	5
Low percentage of vacant property	1	2	3	4	5
Low crime rate	1	2	3	4	5

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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