

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE IN CLEVELAND HEIGHTS, OHIO

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I. INTRODUCTION

Fair housing laws exist to counteract the effects of housing discrimination, to protect the right of all people to choose where to live without regard to protected characteristics, and to promote integrated communities. Housing discrimination is prohibited under the federal Fair Housing Act (42 U.S.C. Section 3601, et seq.) based on race, religion, color, sex, national origin, familial status, and disability. Ohio law (O.C.R. Section 4112.02 (H)) prohibits housing discrimination based on all of these protected classes as well as ancestry and military status.

This report aims to meet the provisions outlined in Section 808(e)(5) of the Fair Housing Act, which requires the Secretary of the Department of Housing and Urban Development (HUD) to administer programs in a manner that affirmatively furthers fair housing. State and local governments that receive community development funding from HUD through the Community Development Block Grant (CDBG) program are required to certify that they affirmatively further fair housing in their usage of those funds.¹ In addition, recipients of HOME Investment Partnership (HOME) funding must also affirmatively further fair housing and document their actions to address identified impediments to HUD.² As a recipient of CDBG funding, the City of Cleveland Heights must certify that it affirmatively furthers HUD's fair housing goals.

To fulfill its fair housing obligation, HUD requires a grantee to:

1. Conduct an Analysis of Impediments to Fair Housing Choice (AI) within the jurisdiction, with a recommendation that the AI be updated "at least once every 3 to 5 years;"
2. Take appropriate actions to overcome the effects of any impediments identified through the analysis, including developing lists of "specific actions...to be undertaken" such as "milestones, timetables, and measurable results;" and
3. Maintain records reflecting the analysis, including the AI, and actions taken to eliminate identified impediments.³

Although the AI itself is not submitted to HUD, local jurisdictions are required to provide HUD with a summary of the AI, in addition to the jurisdiction's accomplishments for the past year, as part of its annual performance report under the Consolidated Plan regulations.⁴ An Analysis of Impediments to Fair Housing Choice reviews barriers to fair housing choice in both the public and private sectors. Impediments to fair housing are defined as:

¹ 42 U.S.C. § 5304(b)(2)

² The United States Department of Housing and Urban Development (HUD), *Fair Housing Planning Guide*, Vol. 1, p.1-2.

³ 24 C.F.R. §91.425 (a)(1)(i); 24 C.F.R. §570.601(a)(2); and HUD, *Fair Housing Planning Guide*, Vol. 1, p. 1-2 to 1-3 and 2-5 to 2-6.

⁴ HUD, *Fair Housing Planning Guide*, Vol. 1, p.2-7, citing 24 C.F.R. §91.520(a). HUD does note that it "could request submission of the AI in the event of a complaint or as part of routine monitoring." *Id.*

1. Any actions, omissions, or decisions taken because of race, color, national origin, religion, family status, disability, or sex which restrict housing choice or the availability of housing choices; or
2. Any actions, omissions, or decisions which have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, national origin, religion, family status, disability, or sex.⁵

While AIs may address affordable housing issues, the HUD Planning Guide notes that the AI should have a “fair housing perspective” and that, while related, affordable housing activities are not the same as fair housing activities.⁶

This Analysis was completed by the Fair Housing Center for Rights & Research for the City of Cleveland Heights. The Fair Housing Center for Rights & Research (The Fair Housing Center) is a private, not-for-profit, fair housing agency whose mission is to protect fair housing rights, eliminate housing discrimination, and promote integrated communities. The Fair 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 advocacy, testing, complaint investigation and resolution, and litigation.

⁵ HUD, *Fair Housing Planning Guide*, Vol. 1, p.2-7 to 2-8.

⁶ HUD, *Fair Housing Planning Guide*, Vol. 1, p. 5-4.

II. METHODOLOGY

Information for this report was collected through a variety of methods, including in-person and telephone interviews and collection of other primary data from a number of resources.

Demographic information used in this report was obtained from the United States Census, the American Community Survey, and A Picture of Subsidized Households, a dataset provided by HUD's Office of Policy Development & Research. Information that is not provided in the decennial Census was used from the American Community Survey estimates. Additionally, because the U.S. Census has changed data collection methodologies from year to year, there is data that cannot be compared over time. In this case, the most recent data is displayed. Additional demographic information was provided by the United States Department of Housing and Urban Development, the Ohio Department of Education, and the National Center of Education Statistics.

Mortgage lending data was compiled by The Fair Housing Center using the software "Lending Patterns." The data is 2018 data, which is the most recent HMDA data available. Foreclosure data was obtained from the Western Reserve Land Conservancy.

Data on fair housing complaints was obtained from the U.S. Department of Housing and Urban Development (HUD).

The Fair Housing Center contacted key stakeholders in the City of Cleveland Heights and Cuyahoga County to obtain their perspectives on possible impediments to fair housing in the City of Cleveland Heights. Interviews were conducted from September 2019 to December 2019. Questions were open-ended. In total, The Fair Housing Center staff interviewed 14 individuals or organizations.

III. EVALUATION OF CLEVELAND HEIGHTS' FAIR HOUSING PROCESS

A. Previous Impediments Identified

The 2013 Regional AI, which was completed by the Northeast Ohio Sustainable Communities Consortium, identified public and private sector impediments to fair housing in the five-county Cleveland Housing Market Area. The impediments to fair housing choice in the private and public sector for the City of Cleveland Heights are listed below:⁷

1. Discriminatory terms, conditions, privileges, or facilities relating to rental housing
2. Failure to make reasonable accommodations or modifications
3. Preferences stated in advertisements for rental housing
4. Denial of home purchase loans
5. Predatory lending in the home purchase market
6. Failure to comply with accessibility requirements in construction of housing units
7. Lack of sufficient fair housing policies or practices
8. Lack of sufficient fair housing outreach and education efforts
9. Some land use and planning decisions and operational practices resulting in unequal access to government services such as transportation
10. Policies and practices used decades ago have resulted in segregation of minority populations
11. Decisions regarding definitions of "family," "dwelling unit," and related terms
12. Lack of inclusionary policies

B. Current Impediments

1. Cleveland Heights has limited Accessible Housing Options for People with Disabilities
2. The City of Cleveland Heights' Fair Housing Ordinance does not protect Housing Voucher Program Participants
3. Criminal Activity Nuisance Ordinance
4. Low-income residents are displaced by eviction and housing costs
5. Race disparities in mortgage lending

⁷ Northeast Ohio Sustainable Communities Consortium, 2013 Regional Analysis of Impediments to Fair Housing Choice and Fair Housing Equity Assessment, vol.3, Technical Appendix Part 1 (2013).

IV. DEMOGRAPHICS

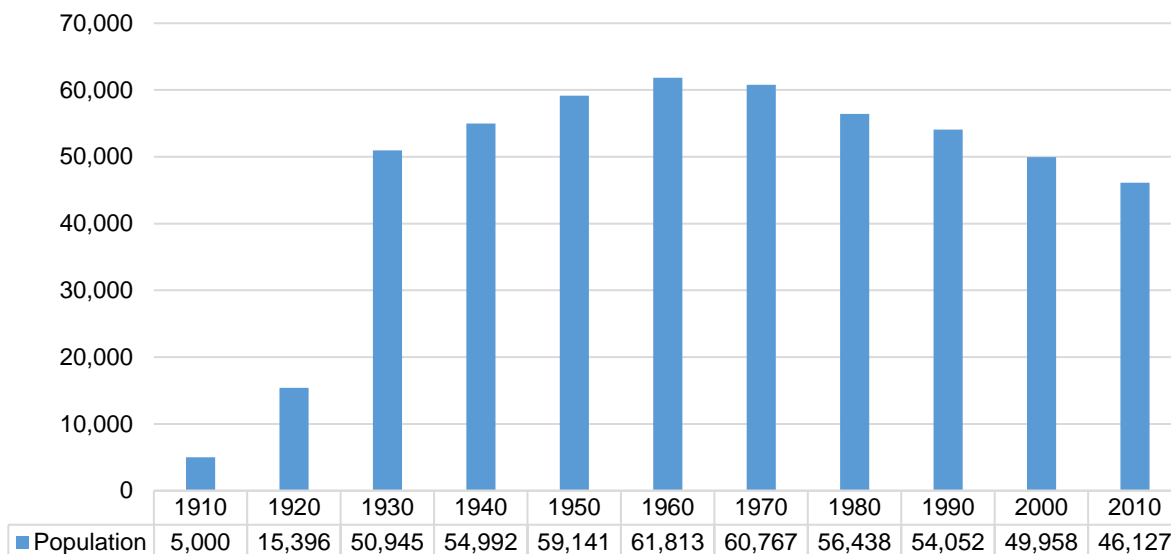
A. Introduction

This section offers a review of general demographic data particular to the classes protected by the federal Fair Housing Act.

B. Total Population

The population of the City of Cleveland Heights has grown and declined in tandem with the trend throughout Cuyahoga County (see Figure 1). After six decades of sustained growth, from 1910 to 1960, the City of Cleveland Heights' population increased to 61,813. The population declined by 24.1% from 1970 to 2010. Cuyahoga County's total population grew to 1,721,300 in 1970, followed by four decades of population loss (25.6% countywide). In 2017, the total population of Cleveland Heights was 45,024.

Figure 1: Population of the City of Cleveland Heights, 1910-2010



(Source: U.S. Census; World Population Review; City of Cleveland Heights)

C. Diversity

The white population was the majority group in Cleveland Heights from 1990 to 2010; in 2017, people of color comprised 51.9% of the population (see Table 1 and Figure 2). In 1990, Cleveland Heights was 59.6% white, but decreased by 33.6% from 1990 to 2017. African Americans made up 41.7% of the population in 1990, having decreased by 5.9% from 1990 to 2017. The Hispanic/Latino population was 1.1% of the population in 1990, but grew by 93.6% between 1990 and 2017, making up 2.5% of Cleveland Heights' population in 2017. The Asian American population was 5.2% of the population in 2017 and two or more races were 2.4% of the population.

A significant portion of the African American population resides in the northern Noble Monticello neighborhoods and the Heights Rockefeller area (census tracts 1403.01, 1405, and 1407.01). A large cluster of the white population lives in Coventry Village, the Cedar Lee neighborhood, and the area bordering University Heights, south of Mayfield Road (census tracts 1411, 1408, and 1412; see Table 2). Interviewees shared that the City of Cleveland Heights is known as a progressive, diverse, and welcoming community.

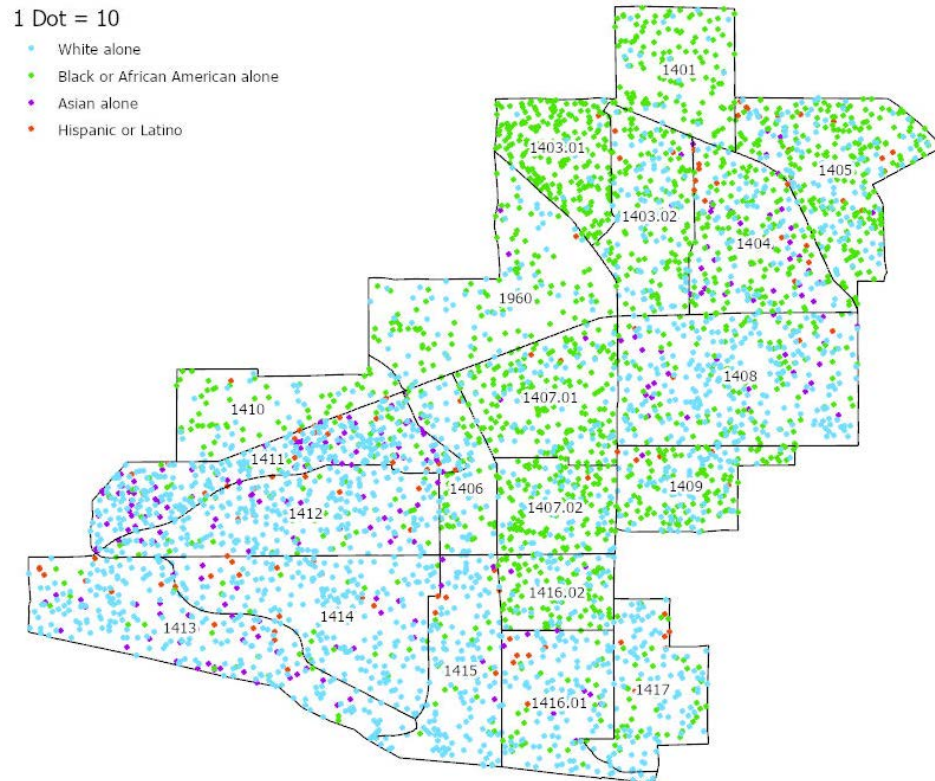
However, common stereotypes of racial bias persist, such as associating those of a different race with “low-income” or renters with “Section 8.” Interviewees noted racial disparities remain in the criminal, civil, and housing courts of the City. While nearly every neighborhood is racially and ethnically mixed, interviewees stated a racial north-south divide exists: neighborhoods north of Monticello Road have a greater concentration of African Americans and affordable housing, and neighborhoods south of Monticello Road have a greater concentration of whites.

Table 1: Racial Demographics of the City of Cleveland Heights, 1990-2010 & 2017

Race/Ethnicity	1990		2000		2010		2017	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent
White	32,209	59.6	25,840	51.7	23,965	51.2	21,378	47.5
African American	19,926	36.9	20,873	41.8	18,925	40.4	18,758	41.7
Hispanic/Latino	582	1.1	791	1.6	1,132	2.4	1,127	2.5
Asian American	1,129	2.1	1,280	2.6	1,703	3.6	2,353	5.2
American Indian and Alaskan Native	95	0.2	81	0.2	64	0.1	58	0.1
Two or More Races	111	0.2	1,152	2.3	920	2.0	1,100	2.4

(Source: 1990 Census; 2000 Census; 2010 American Community Survey 5-Year Estimates; 2017 American Community Survey 5-Year Estimates)

Figure 2: Population of Cleveland Heights by Race and Ethnicity, 2017



(Source: 2017 American Community Survey 5-Year Estimate)

Table 2: Racial Demographics by Census Tract, City of Cleveland Heights, 2017

Census Tract		White	African American	Hispanic/Latino	Asian American	American Indian and Alaskan Native	Two or More Races
1401	Number	214	1,222	0	0	0	98
	Percent	13.5	77.0	0.0	0.0	0.0	6.2
1403.01	Number	89	2,298	7	0	0	0
	Percent	3.6	93.3	0.3	0.0	0.0	0.0
1403.02	Number	748	1,299	32	44	0	10
	Percent	35.1	60.9	1.5	2.1	0.0	0.5
1404	Number	724	1,428	118	298	0	28
	Percent	27.7	54.6	4.5	11.4	0.0	1.1
1405	Number	1,060	2,279	154	53	0	63
	Percent	29.2	62.9	4.2	1.5	0.0	1.7
1406	Number	530	469	6	19	0	22
	Percent	50.7	44.8	0.6	1.8	0.0	2.1
1407.01	Number	613	1,728	20	21	0	100
	Percent	24.4	68.9	0.8	0.8	0.0	4.0
1407.02	Number	515	1,290	7	0	0	0
	Percent	28.0	70.1	0.4	0.0	0.0	0.0
1408	Number	2,246	1,161	38	241	0	67
	Percent	59.8	30.9	1.0	6.4	0.0	1.8
1409	Number	763	1,111	45	9	12	8
	Percent	38.9	56.7	2.3	0.5	0.6	0.4
1410	Number	281	591	10	0	7	35
	Percent	30.4	64.0	1.1	0.0	0.8	3.8
1411	Number	2,763	416	177	783	13	202
	Percent	63.5	9.6	4.1	18.0	0.3	4.6
1412	Number	2,240	381	100	272	0	132
	Percent	71.3	12.1	3.2	8.7	0.0	4.2
1413	Number	2,076	183	131	327	0	162
	Percent	72.1	6.4	4.6	11.4	0.0	5.6
1414	Number	2,058	168	97	124	0	7
	Percent	83.4	6.8	3.9	5.0	0.0	0.3
1415	Number	1,308	190	61	45	0	26
	Percent	80.2	11.7	3.7	2.8	0.0	1.6
1416.01	Number	1,141	270	57	81	0	57
	Percent	71.0	16.8	3.5	5.0	0.0	3.5
1416.02	Number	477	900	0	21	26	26
	Percent	32.9	62.1	0.0	1.4	1.8	1.8
1417	Number	941	406	59	0	0	30
	Percent	65.5	28.3	4.1	0.0	0.0	2.1
1960	Number	591	968	8	15	0	27
	Percent	36.7	60.2	0.5	0.9	0.0	1.7

(Source: 2017 American Community Survey 5-Year Estimates)

D. Ethnic Diversity and Foreign-Born Population

The Fair Housing Act protects foreign-born individuals by prohibiting discrimination based on national origin. The City of Cleveland Heights' foreign-born population rose to 9.1% of the population in 2017 (see Table 3). The foreign-born population increased from 2000 to 2017 in Cleveland Heights, the City of Shaker Heights, and Cuyahoga County. In the neighboring suburbs of East Cleveland and South Euclid, the foreign-born population has steadily decreased since 2000; in University Heights, the foreign-born population rose from 2000 to 2010 and fell from 2010 to 2017.

Table 3: Foreign-Born Population of the City of Cleveland Heights, Select Suburbs, and Cuyahoga County, 2000-2017

	2000		2010		2017	
	Number	Percent	Number	Percent	Number	Percent
Cleveland Heights	4,130	8.3	4,160	8.9	4,081	9.1
East Cleveland	800	2.9	538	2.7	377	2.2
Shaker Heights	2,132	7.2	2,151	7.6	2,484	9.0
South Euclid	2,220	9.4	1,528	6.8	1,215	5.6
University Heights	923	6.5	1,189	8.8	1,031	7.8
Cuyahoga County	88,761	6.4	90,526	7.0	89,890	7.1

(Source: 2000 Census; 2010 American Community Survey 5-Year Estimates; 2017 American Community Survey 5-Year Estimates)

The largest population of foreign-born individuals in Cleveland Heights is from Asia, followed by the European population (see Table 4). The Asian population grew by 50.3% to 2,009 individuals in 2017. The European population decreased in population by 55.0% since 2000, falling to 870 individuals in 2017. The Latin American population increased by 57.6% from 2000 to 2017.

Cleveland Heights is home to a large Jewish population and is a location for Bhutanese refugee resettlement. The City supports Gesher, a Jewish organization that offers job training and social services. The City also contributes funds to the Bhutanese Community of Greater Cleveland organization, which provides job training and English-as-a-second-language classes to refugees. The Cleveland Heights City library also offers English-as-a-second-language classes and social services to the refugee community. Interviewees noted instances in which Bhutanese immigrants are taken advantage of by landlords during the housing rental process to immigrants' disadvantage. When financially feasible, many Bhutanese families move out of Cleveland Heights and into Beachwood or other west side suburbs for better schools.

Table 4: Foreign-Born Population in the City of Cleveland Heights by Region of Birth

	2000		2010		2017	
	Number	Percent	Number	Percent	Number	Percent
Total	4,130	100.0	4,160	100.0	4,081	100.0
Europe	1,934	46.8	1,369	32.9	870	21.3
Asia	1,337	32.4	1,764	42.4	2,009	49.2
Africa	204	4.9	366	8.8	343	8.4
Oceania	17	0.4	10	0.2	64	1.6
Latin America	420	10.2	495	11.9	662	16.2

(Source: 2000 Census; 2010 American Community Survey 5-Year Estimates; 2017 American Community Survey 5-Year Estimates)

Foreign-born individuals in Cleveland Heights are from diverse countries of origin. China is the leading country of origin in Cleveland Heights, followed by India and Jamaica (see Table 5). Other countries of origin include Kuwait, Ukraine, Nepal, Russia, Canada, Korea, and the United Kingdom.

Table 5: Country of Origin for Foreign-Born Population in the City of Cleveland Heights, 2017

Country of Origin	Number of Foreign-Born Individuals	Percent of Cleveland Heights Foreign-Born Population
China	655	16.0
India	298	7.3
Jamaica	251	6.2
Kuwait	217	5.3
Ukraine	154	3.8
Nepal	152	3.7
Russia	144	3.5
Canada	133	3.3
Korea	120	2.9
United Kingdom	108	2.6

(Source: 2017 American Community Survey 5-Year Estimates)

E. Families with Children

In 1988, Congress amended the Fair Housing Act to prohibit discrimination based on familial status, in response to widespread discrimination against families with children. The total number of households with children under 18 decreased by 24.1% from 2000 to 2017 (see Table 6). Households with children under 18 comprised 25.2% of the population in 2017.

Table 6: Households with Individuals under 18 in the City of Cleveland Heights, 2000-2017

	2000		2010		2017	
	Number	Percent	Number	Percent	Number	Percent
Cleveland Heights	6,318	30.2	5,060	25.9	4,798	25.2

(Source: 2000 Census; 2010 American Community Survey 5-Year Estimates; 2017 American Community Survey 5-Year Estimates)

F. People with Disabilities

Discrimination because of a disability became illegal in 1988 as an amendment to the Fair Housing Act. In Cleveland Heights, seniors are the largest population with disabilities. Almost 72% (71.6%) of individuals age 65 and over have a disability (see Table 7). Nearly six percent (5.5%) of those under 18 and 15.7% of 18-to-64-year-olds have a disability. Of the neighboring suburbs, Cleveland Heights has the largest total population of people with disabilities.

Due to Cleveland Heights' aging housing stock, it can be challenging to find accessible, affordable housing. The city has many older walk-up rentals that are not wheelchair accessible. Single-family homes are mostly two-story homes with multiple stairs, no first floor masters or full bathrooms, and rarely have attached garages. Some resident homeowners with disabilities did extensive renovations to make their homes

accessible. While newly constructed housing is built to be more accessible, it is at a higher price that many with disabilities cannot afford. Cleveland Heights is home to a subsidized senior housing rental complex that provides housing for those over the age of 62 and for those with mobility disabilities of any age. The complex is 100% wheelchair accessible and has an extensive waiting list. The City collaborates with a non-profit to offer an aging-in-place program for income-eligible seniors to make accessibility updates to their homes. An interviewee shared several prospective residents with disabilities could not find accessible housing in the City and therefore could not move to Cleveland Heights.

Residents with disabilities note that many public spaces and businesses in the City are not easily accessible, with no ramps, automatic door openers, or scooters, and very limited parking for those with disabilities. However, the City of Cleveland Heights has constructed accessible signage and accessible curb cuts for people with disabilities. One interviewee stated that often “the most [publically] accessible neighborhoods have the least accessible housing.”

Table 7: People with Disabilities in the City of Cleveland Heights, Select Suburbs, & Cuyahoga County, 2017

	Under 18		18 to 64 Years		65 and Over	
	Number	Percent	Number	Percent	Number	Percent
Cleveland Heights	375	5.5	2,340	15.7	2,275	71.6
East Cleveland	182	7.3	1,973	35.4	1,573	97.3
Shaker Heights	168	3.3	1,260	14.9	1,283	57.1
South Euclid	296	8.8	1,171	15.5	754	50.3
University Heights	60	3.4	591	14.1	430	65.0
Cuyahoga County	15,667	8.4	96,915	23.2	73,450	73.9

(Source: 2017 American Community Survey 5-Year Estimates)

V. INCOME

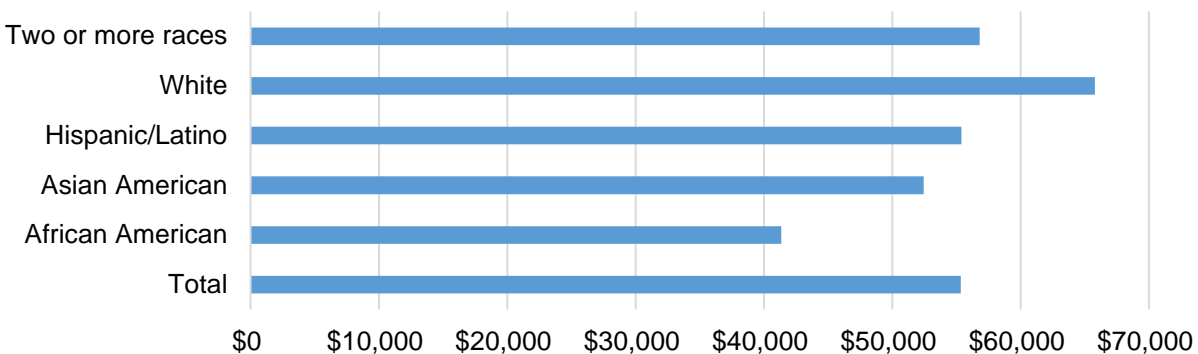
Income directly impacts an individual's or household's housing choice as it can determine whether certain housing and neighborhoods are affordable or out of financial reach. The 2017 median income for white households (\$66,219) in Cleveland Heights is higher than that of the total population (\$55,339) and Hispanics/Latinos (\$55,400; see Table 8 and Figure 3). The median income for African Americans is the lowest at \$41,363. Interviewees remarked that Cleveland Heights has a diverse socio-economic mix of residents and the City is inclusive of folks of various income levels, races, and ethnicities.

Table 8: Median Household Income by Race & Ethnicity in the City of Cleveland Heights, 2017

Race/Ethnicity	Median Income
Total	\$55,339
African American	\$41,363
Asian American	\$52,455
Hispanic/Latino	\$55,400
White	\$66,219
Two or more races	\$56,818

(Source: 2017 American Community Survey 5-Year Estimates)

Figure 3: Median Household Income by Race & Ethnicity in the City of Cleveland Heights, 2017



(Source: 2017 American Community Survey 5-Year Estimates)

The United States Census determines “poverty thresholds” based on the size of the household and income. The household is considered in poverty if it falls below its designated income threshold based on its size. Designed in the 1960s, these thresholds are mostly determined by the family’s budget for food.⁸ In Cleveland Heights, 18.7% of individuals were at or under the federal poverty rate in 2017 (see Table 9). Nearly thirteen percent (12.9%) of all families and twenty-one percent (20.7%) of families with children under 18 were at or under the federal poverty rate (see Table 12). Coventry Village, City Center, and the

⁸ United States Census Bureau, “How the Census Bureau Measures Poverty,” Available at: <https://www.census.gov/topics/income-poverty/poverty/guidance/poverty-measures.html>

neighborhood north of Monticello Road (census tracts 1410, 1407.01, 14.03.01) have the highest poverty rates (44.3%, 37.6%, and 35.1% respectively; see Table 10).

Table 9: Poverty Rate of Individuals in the City of Cleveland Heights, 2017

	Number	Percent
Cleveland Heights	8,226	18.7

(Source: 2017 American Community Survey 5-Year Estimates)

Table 10: Poverty Rate by Census Tract in the City of Cleveland Heights, 2017

Census Tract	Poverty Rate
1401	16.7%
1403.01	35.1%
1403.02	17.0%
1404	18.8%
1405	21.0%
1406	17.6%
1407.01	37.6%
1407.02	25.2%
1408	17.6%
1409	8.2%
1410	44.3%
1411	27.5%
1412	13.4%
1413	14.1%
1414	4.3%
1415	10.1%
1416.01	5.4%
1416.02	15.9%
1417	3.8%
1960	7.9%

(Source: 2017 American Community Survey 5-Year Estimates)

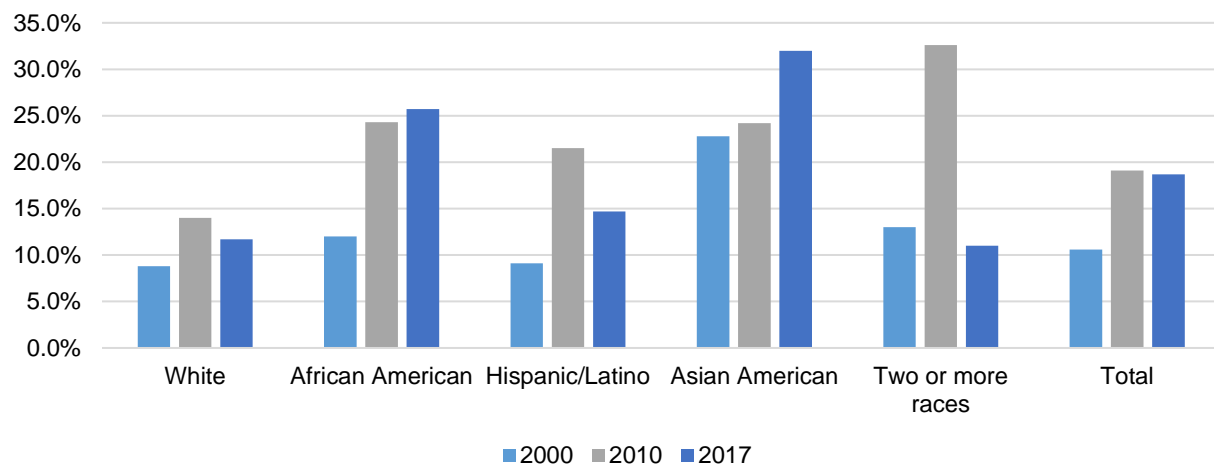
Nearly all minority groups in Cleveland Heights have higher poverty rates in comparison to their white counterpart (11.7% in 2017; see Table 11). The poverty rate among the Asian American and African American populations has steadily increased since 2000 reaching 32.0% and 25.7% respectively in 2017 (see Figure 4). The poverty rate for the Hispanic/Latino population fluctuated from 2000 to 2017, rising to 21.5% in 2010 but decreasing to 14.7% in 2017.

Table 11: Poverty Rate by Race & Ethnicity of Individuals in the City of Cleveland Heights, 2000-2017

Race/Ethnicity	2000	2010	2017
White	8.8%	14.0%	11.7%
African American	12.0%	24.3%	25.7%
Hispanic/Latino	9.1%	21.5%	14.7%
Asian American	22.8%	24.2%	32.0%
Two or more races	13.0%	32.6%	11.0%
Total	10.6%	19.1%	18.7%

(Source: 2000 Census; 2010 American Community Survey 5-Year Estimates; 2017 American Community Survey 5-Year Estimates)

Figure 4: Poverty Rate by Race & Ethnicity of Individuals in the City of Cleveland Heights, 2000-2017



(Source: 2000 Census; 2010 American Community Survey 5-Year Estimates; 2017 American Community Survey 5-Year Estimates)

In Cleveland Heights, female-headed households with children have a particularly high poverty rate at 39.3% in 2017, which is twice the poverty rate of the total Cleveland Heights population (18.7%; see Table 12). All suburbs experienced an increase in the poverty rate from 2000 to 2017.

Table 12: Poverty Rate by Additional Categories in the City of Cleveland Heights, Poverty Rate of Individuals in Neighboring Cities, Cuyahoga County, & the United States, 2000-2017

	2000	2010	2017
Cleveland Heights	Percent	Percent	Percent
Female-headed household with related children under 18	20.5	41.7	39.3
Age 65 or over	15.2	13.1	11.3
Persons with disabilities	16.3	24.3	22.3
All Families	7.4	13.5	12.9
Families with related children under 18	9.1	21.1	20.7
All Individuals	10.6	19.1	18.7
East Cleveland	32.0	37.4	40.5
Shaker Heights	6.9	8.6	8.6
South Euclid	4.5	7.7	13.1
University Heights	5.8	6.2	13.4
Cuyahoga County	13.1	16.4	18.3
United States	12.4	13.8	14.6

(Source: 2000 Census; 2010 American Community Survey 5-Year Estimates; 2017 American Community Survey 5-Year Estimates)

VI. EMPLOYMENT

Over the past five years, the unemployment rate decreased in Cleveland Heights from 10.6% in 2010 to 7.4% in 2017 (see Table 13). Cleveland Heights' unemployment rate is higher than the Cleveland-Elyria Metropolitan Statistical Area 2017 unemployment rate of 6.8%.⁹ The population of 16-year-olds and over, which represents those eligible to enter the labor force, remained relatively steady, falling by 1.3% from 2013 to 2017. The civilian labor force gradually decreased over the five years.

Table 13: Labor Force in the City of Cleveland Heights, 2013 to 2017

	2013	2014	2015	2016	2017
Population 16 or over	36,997	36,841	36,557	36,672	36,528
Civilian Labor Force	24,300	24,181	23,587	23,104	22,955
Employed	21,729	21,924	21,482	21,077	21,267
Unemployed	2,571	2,257	2,105	2,027	1,688
Unemployment Rate	10.6%	9.3%	8.9%	8.8%	7.4%

(Source: 2013-2017 American Community Survey 5-Year Estimates)

The private sector and service providing industries are the largest employers and generate the most wages in Cuyahoga County (see Table 14). The largest industry employers in Cuyahoga County are educational services, health care, and social assistance; professional, scientific, management, administrative, and waste management services; and arts, entertainment, recreation, accommodation, and food services (see Table 15).

Table 14: Industries, Cuyahoga County, 2017

	Number of Establishments	Average Employment	Total Wages	Average Weekly Wage
Private Sector Total	34,712	627,235	\$34,799,593,289	\$1,067
Goods Producing	4,158	88,224	\$5,665,396,238	\$1,235
Service Providing	30,555	539,011	\$29,134,197,051	\$1,039
Federal Government	N/A	16,191	\$1,257,679,016	\$1,494
State Government	N/A	4,191	\$297,222,057	\$1,364
Local Government	N/A	72,438	\$3,854,126,485	\$1,023

(Source: Ohio Department of Development, Cuyahoga County Profile 2018)

⁹ U.S. Department of Labor, U.S. Bureau of Labor Statistics, "Metropolitan Area Employment and Unemployment—August 2017," Available at: https://www.bls.gov/news.release/archives/metro_09272017.pdf

Table 15: Employees in Types of Industries, City of Cleveland Heights, 2017

Type of Industry	Number	Percent
Agriculture, forestry, fishing/hunting, and mining	59	0.3
Construction	805	3.8
Manufacturing	1,474	6.9
Wholesale trade	336	1.6
Retail trade	1,534	7.2
Transportation and warehousing, and utilities	459	2.2
Information	408	1.9
Finance and insurance, and real estate and rental and leasing	1,482	7.0
Professional, scientific, and management, and administrative and waste management services	2,659	12.5
Educational services, and health care and social assistance	8,404	39.5
Arts, entertainment, and recreation, and accommodation and food services	2,116	9.9
Other services, except public administration	886	4.2
Public administration	645	3.0

(Source: 2017 American Community Survey 5-Year Estimates)

VIII. HOUSING

A. Homeownership Rates

There are numerous social benefits to homeownership for communities and individuals. Such social benefits include stability, political participation, community investment, positive educational outcomes for children, wealth creation, quality housing, and lower resident turnover. Research on the perception of the social benefits of owning a home after the 2008 housing crisis shows that over the long-term, people prefer owning over renting, will reinvest in the market, and still expect the financial-social benefits of homeownership.¹⁰ White households have a higher homeownership rate (61.8%) than the City of Cleveland Heights overall (55.2%) and all other racial and ethnic groups (see Table 16). Half of all African American households (51.4%) and a quarter of Hispanic/Latino households (25.9%) own homes in the city. Asian Americans have the lowest homeownership rate at 23.1%.

Table 16: Housing Tenure by Race & Ethnicity of Household in the City of Cleveland Heights, 2017

Race/Ethnicity	Owner-occupied	Renter-occupied	Home Ownership Rate
White	6,327	3,909	61.8%
African American	3,709	3,508	51.4%
Asian American	263	877	23.1%
American Indian/ Alaska Native	12	16	42.9%
Other	57	71	44.5%
Two or more races	152	140	52.1%
Hispanic/Latino	115	329	25.9%

(Source: 2017 American Community Survey 5-Year Estimates)

The Fairmount Historic Cedar and Noble neighborhoods (census tracts 1414 and 1405) have the greatest number of owner-occupied units (830 and 728 respectively; see Table 17 and Figure 5). Coventry Village and the Heights Rockefeller neighborhood (census tracts 1411 and 1408) have the greatest number of renter-occupied units (1,767 and 969 respectively). In terms of total occupied units, the Fairmount Historic Cedar neighborhood and the southeast neighborhood bordering University Heights (census tracts 1414 and 1417) have the highest rate of homeownership (91.7% and 91.6% respectively).

Cleveland Heights has a broad range of home options, from starter homes to mansions. The City of Cleveland Heights offers a down payment assistance program to residents for home purchase. Eligible owner-occupants can apply for up to \$10,000 in down payment assistance for a single-family home or two-family home.¹¹ Interviewees commented that the City's high property taxes are both a barrier to purchasing a home and a burden that can lead to tax-delinquent foreclosure. Although the City and non-profit organizations offer various programs for homeowners, one interview noted there are few programs to serve renters' needs in the community.

¹⁰ Rohe, W. & Lindblad, M. *Reexamining the Social Benefits of Homeownership after the Housing Crisis*. Joint Center for Housing Studies of Harvard University (August 2013).

¹¹ City of Cleveland Heights, "Housing Programs," Accessed via: <https://www.clevelandheights.com/240/Down-Payment-Assistance-Program>

Table 17: Owner-Occupied & Renter-Occupied Housing Units by Census Tract, 2017

Census Tract	Owner-Occupied	Renter-Occupied	Homeownership Rate
1401	457	155	74.7%
1403.01	537	326	62.2%
1403.02	680	330	67.3%
1404	686	529	56.5%
1405	728	703	50.9%
1406	228	162	58.5%
1407.01	554	397	58.3%
1407.02	371	353	51.2%
1408	633	969	39.5%
1409	530	191	73.5%
1410	31	415	7.0%
1411	632	1,767	26.3%
1412	717	807	47.0%
1413	502	342	59.5%
1414	830	75	91.7%
1415	423	297	58.8%
1416.01	512	156	76.6%
1416.02	358	237	60.2%
1417	592	54	91.6%
1960	519	256	67.0%

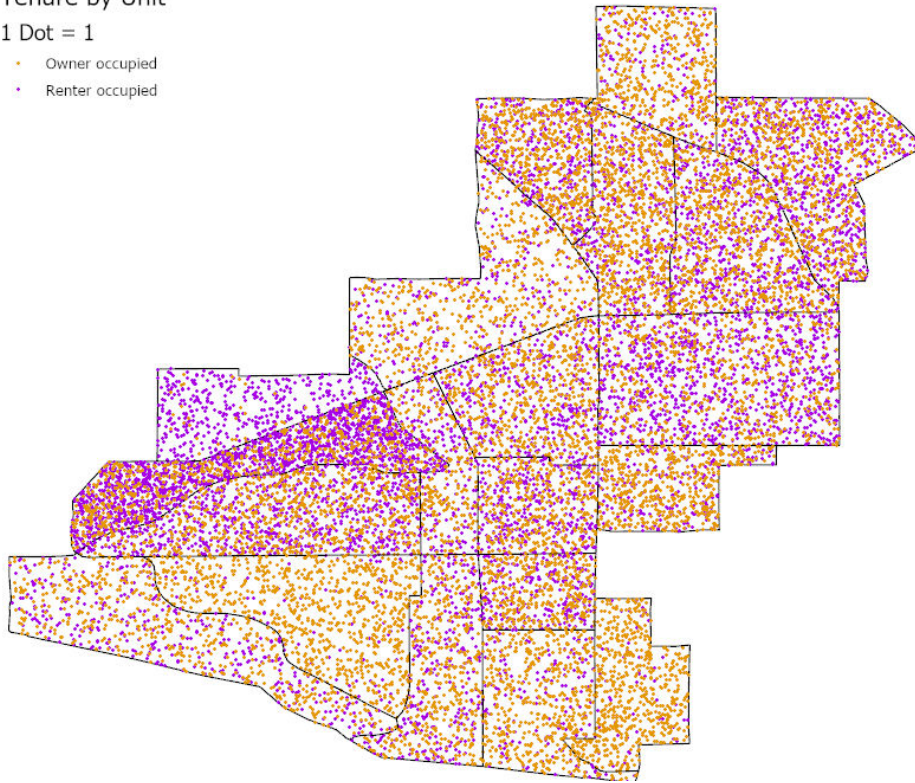
(Source: 2017 American Community Survey 5-Year Estimates)

Figure 5: Owner-Occupied & Renter-Occupied Housing Units by Census Tract in the City of Cleveland Heights, 2017

Tenure by Unit

1 Dot = 1

- Owner occupied
- Renter occupied



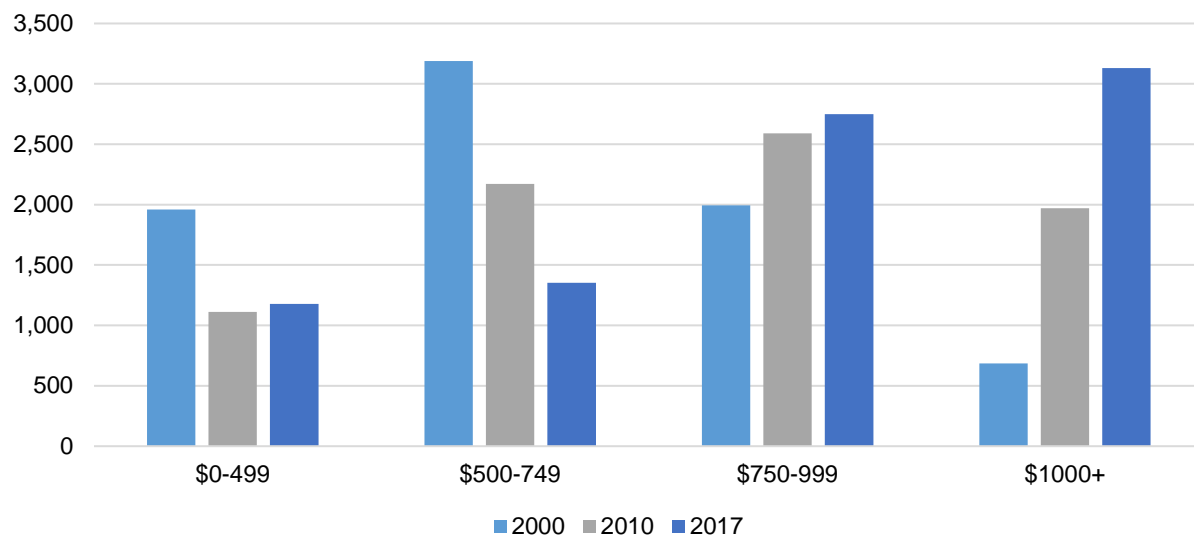
B. Rental Costs

Monthly rents in Cleveland Heights climbed steadily from 2000 to 2017. The number of units available in the \$0-499 and \$500 to 749 fell significantly. Over the last decade and a half, rental units in Cleveland Heights have become more expensive as rentals in the \$1000+ price range increased dramatically by 356.9% (see Figure 7 and Table 18).

Housing affordability is not uniform across the city and affects people of color to a greater degree. Interviewees noted that rents are increasing rapidly near growing commercial areas and there is pressure to “move out” lower-income residents from these areas. Interviewees also commented that many households pay high rental rates despite currently low mortgage payments due to lack of access to traditional banking.

Interviewees observed that property owners often advertise available rentals by word of mouth, inviting particular groups to apply to the exclusion of others. The City, located close to universities and hospitals, has a large renter population that includes students and medical residents. Consequently, the majority of rentals have a June or July lease start date based on the student schedule. Therefore, if an individual or family searches for housing outside of the summer lease start dates, it can be challenging to find an available rental. A resident with a disability shared that without the SSDI federal subsidy, the resident would not be able to afford market rate for rentals in the City (the resident commented \$900-1,000 rentals are common for good quality housing) and given the long waitlist for federally-subsidized rentals, the resident may be forced to move out of the City.

Figure 6: Units per Rental Cost Range in the City of Cleveland Heights, 2000-2017



(Source: 2000 Census; 2010 American Community Survey 5-Year Estimates; 2017 American Community Survey 5-Year Estimates)

Table 18: Units per Rental Cost Range in the City of Cleveland Heights, 2000-2017

Monthly Rent	2000	2010	2017
\$0-499	1,959	1,112	1,178
\$500-749	3,189	2,172	1,353
\$750-999	1,993	2,590	2,748
\$1000+	685	1,970	3,130

(Source: 2000 Census; 2010 American Community Survey 5-Year Estimates; 2017 American Community Survey 5-Year Estimates)

Multifamily units dominate the Cleveland Heights rental housing market (5-19 unit rentals and 20+ unit rentals), maintaining 2,000+ units over the last 17 years (see Table 19). The number of single-family/1-unit rentals increased since 2000, reaching 2,507 units in 2017. The smallest number of rentals are 2-4 unit rentals at 1,777 units.

Table 19: Rental Units by Building Size in the City of Cleveland Heights, 2000-2017

	2000	2010	10 Year Change	2017	7 Year Change
Single-Family/1 Unit	1,355	1,932	42.6%	2,507	29.8%
2-4 Units	1,981	1,460	-26.3%	1,777	21.7%
5-19 Units	2,317	2,384	2.9%	2,105	-11.7%
20 or more Units	2,307	2,228	-3.4%	2,106	-5.5%

(Source: 2000 Census; 2010 American Community Survey 5-Year Estimates; American Community Survey 5-Year Estimates)

The Noble and Monticello neighborhoods (census tracts 1405 and 1403.01) have the greatest number of single-family rental units (370 and 243 respectively; see Table 20). Coventry Village (census tract 1411) has the largest quantity of multifamily rentals in Cleveland Heights; it has the most two-to-four family rentals (262), 5-to-19-unit rentals (886), and 20-to-49-unit rentals (206) and the second-most 50+ unit rentals (337). Fairmount Historic Cedar district (census tract 1413) has the second largest number of two-to-four-family rentals (256) and Cedar Lee district (census tract 1412) has 337 5-to-19-unit rentals. The Center Mayfield area (census tract 1404) is home to 169 20-to-49-unit rentals and Severance Center (census tract 1408) has the most 50+ unit rentals (696).

Table 20: Rental Units by Building Size and Census Tract in the City of Cleveland Heights, 2017

Census Tract	Single-Family/ 1 Unit	2-4 Units	5-19 Units	20 to 49 Units	50 or more Units
1401	102	5	42	0	6
1403.01	243	44	29	0	10
1403.02	112	34	59	11	114
1404	185	10	165	169	0
1405	370	44	213	68	8
1406	142	20	0	0	0
1407.01	100	212	34	51	0
1407.02	102	77	75	99	0
1408	171	34	22	46	696
1409	185	6	0	0	0
1410	66	218	131	0	0
1411	59	262	886	206	337
1412	113	187	377	112	18
1413	67	256	14	0	5
1414	49	22	0	4	0
1415	58	234	5	0	0
1416.01	54	102	0	0	0
1416.02	173	0	43	12	0
1417	54	0	0	0	0
1960	102	10	10	94	40

(Source: 2017 American Community Survey 5-Year Estimates)

C. Age of Housing Stock

In 1988, the Fair Housing Amendments Act included a provision that required construction of certain new multifamily housing incorporate accessible features to ensure that people with disabilities have more housing options and greater housing choice. While this did not apply to single-family housing, new construction of such housing can more easily integrate construction with accessible features than can older housing stock. The age of housing stock can be reflective of the overall quality of the housing market, as newer construction exhibits a growing housing market and real estate field.

The United States banned lead-based paint for use in housing in 1978 as lead poisoning via lead-based paint can have a serious and irreparable effect on the developmental growth of young children.¹² Therefore, all homes built after 1978 should be lead-free. Any housing built before 1978 is likely to contain lead-based paint. Cleveland Heights is a partner of LeadSafe Cuyahoga and has certified inspectors that conduct lead abatement throughout the City. In the last year, the City doubled the number of units made safe from lead,

¹² Mayo Clinic, "Lead Poisoning," Available at: <https://www.mayoclinic.org/diseases-conditions/lead-poisoning/symptoms-causes/syc-20354717>.

achieving more lead-safe housing than other municipalities in the County. The City manages two lead abatement contracts with the goal of abating 115 homes in the next three years.

The majority of housing in the City of Cleveland Heights was built prior to 1980. The 1930s were the peak building period in which 55.6% of all housing was built, followed by the 1940s and 1950s (see Figure 7 and Table 21). An estimated ninety percent of all multi-family structures were built before the amendment directing accessible features to be included in the construction of such structures (see Table 22). Most housing in Cleveland Heights is therefore likely inaccessible to people with disabilities and at-risk of lead-based paint. Interviewees shared there are few homes with first floor master bedrooms or wheelchair accessibility in the City and accessibility renovations are costly. The City has limited space to build new, affordable, and accessible housing without having to demolish old housing stock and rebuild upon those lots.

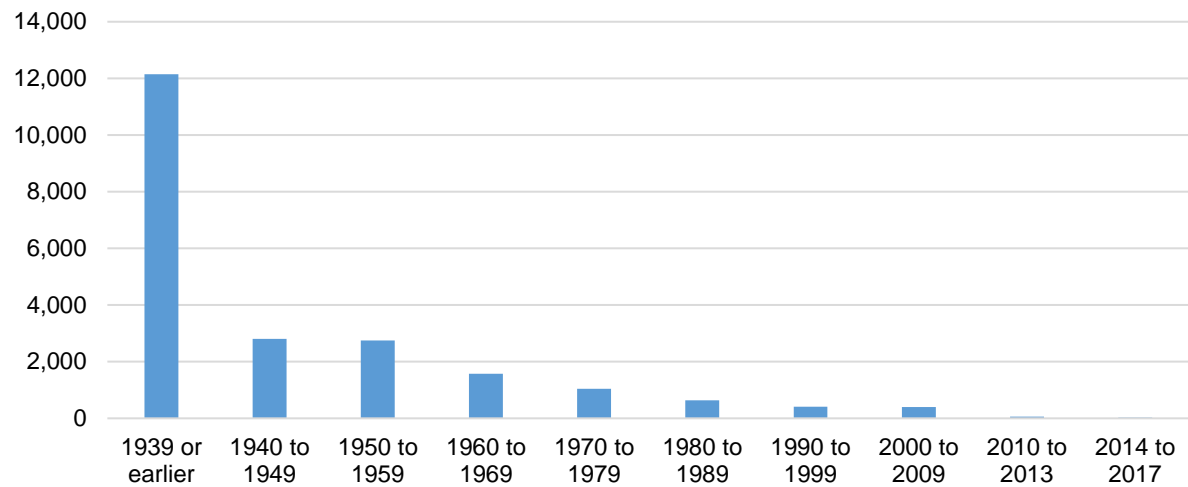
Barriers of fixed income, budget, and size of the home can prevent senior homeowners or homeowners with disabilities from keeping up with needed home repairs or making accessibility modifications. The City of Cleveland Heights, in conjunction with the Home Repair Resource Center (HRRC), offers several home repair programs to income-eligible residents. For seniors and those with permanent disabilities, both a grant for exterior paint repair and a code-violation repair program are available. Income-eligible households can receive a short-term deferred or emergency loan for health and safety issues in housing and for correction of violations. Eligible residents can also apply for a no-interest loan of up to \$35,000 for correction of interior and exterior violations, general upgrades, and home improvements. HRRC also offers a challenge fund that guarantees a home repair loan for those that are not bankable.

The City inspects all residential and commercial buildings in Cleveland Heights. Single-family, two-family, and multi-family rentals, and commercial buildings are inspected every three years (both interior and exterior). Every owner of real estate in Cleveland Heights is required to obtain a Point-of-Sale Certificate of Inspection prior to selling. On a five-year rotation, the exterior of all owner-occupied single-family homes are inspected.¹³ Cleveland Heights does 16,000 to 18,000 total inspections per year. Housing code violations are currently criminal misdemeanors in Cleveland Heights with maximum penalties of six months in jail and \$1,000 fine for every day alleged to be out of compliance for an individual or \$5,000 fine every day alleged to be out of compliance for an entity.¹⁴ This leaves homeowners with a criminal record for a housing code violation. The City has implemented the following policy: if a rental property is tax delinquent, the City will not administer a certificate of occupancy to the landlord, which prevents the landlord from renting out the units.

¹³ City of Cleveland Heights, "Inspectional Services," Housing Programs; Accessed via <https://www.clevelandheights.com/215/Systematic-Inspections>

¹⁴ City of Cleveland Heights, "Housing Court," Accessed via: <http://www.clevelandheightscourt.com/housing.php>

Figure 7: Year Housing Built in the City of Cleveland Heights by Decade



(Source: 2017 American Community Survey 5-Year Estimates)

Table 21: Year Housing Built in the City of Cleveland Heights by Decade

Year Built	Structures	Percentage
2014 to 2017	25	0.1
2010 to 2013	55	0.3
2000 to 2009	396	1.8
1990 to 1999	410	1.9
1980 to 1989	636	2.9
1970 to 1979	1,044	4.8
1960 to 1969	1,573	7.2
1950 to 1959	2,747	12.6
1940 to 1949	2,802	12.8
1939 or earlier	12,151	55.6
Total	21,839	100.0

(Source: 2017 American Community Survey 5-Year Estimates)

Table 22: Occupied Rental Housing Units in Structure with Five or more Units by Year Built in the City of Cleveland Heights

Year Built	Number	Percentage
2010 to 2017	7	0.2
2000 to 2009	99	2.4
1980 to 1999	634	15.1
1960 to 1979	1,069	25.4
1940 to 1959	1,007	23.9
1939 or earlier	1,395	33.1
Total	4,211	100.0

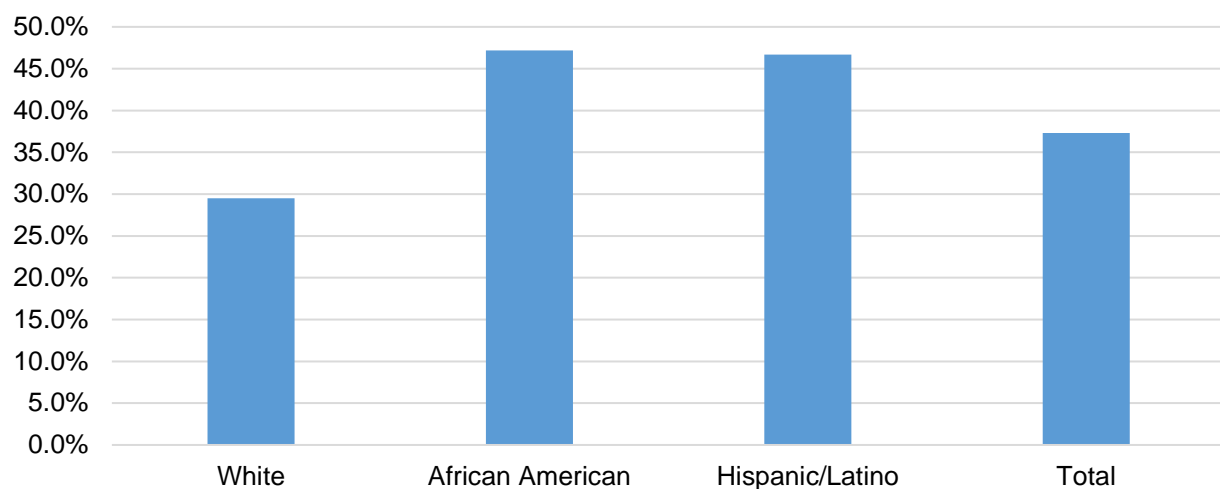
(Source: 2017 American Community Survey 5-Year Estimates)

D. Housing Burden

The Department of Housing and Urban Development defines “housing problems” as having a cost burden greater than thirty percent and one of the following: incomplete kitchen facilities, incomplete plumbing

facilities, or more than one person per room.¹⁵ Nearly half of African American and Hispanic/Latino households in the City experience such housing problems (47.2% and 46.7% respectively; see Figure 8) and 29.5% of white households do. In Cleveland Heights, 37.3% of all households experience housing problems. Households with severe housing problems, defined as the above issues but with a cost burden greater than 50%, mirror this pattern. African American households experience severe housing problems at twice the rate (29.1%) of white households (14.4%). Twenty-seven percent (27.2%) of Hispanic/Latino households and 21.3% of all households in the City experience severe housing problems (see Figure 9). Severely cost-burdened households in Cleveland Heights, defined as households paying more than 50% of their income for housing, include Hispanic/Latino households at 27.9% and African American households at 27.4%, whose rates are twice as much as white households (13.5%). In the City of Cleveland Heights, 19.8% of all households experience severe housing cost burden (see Figure 10).

Figure 8: Households Experiencing Housing Problems by Race & Ethnicity in the City of Cleveland Heights, 2010

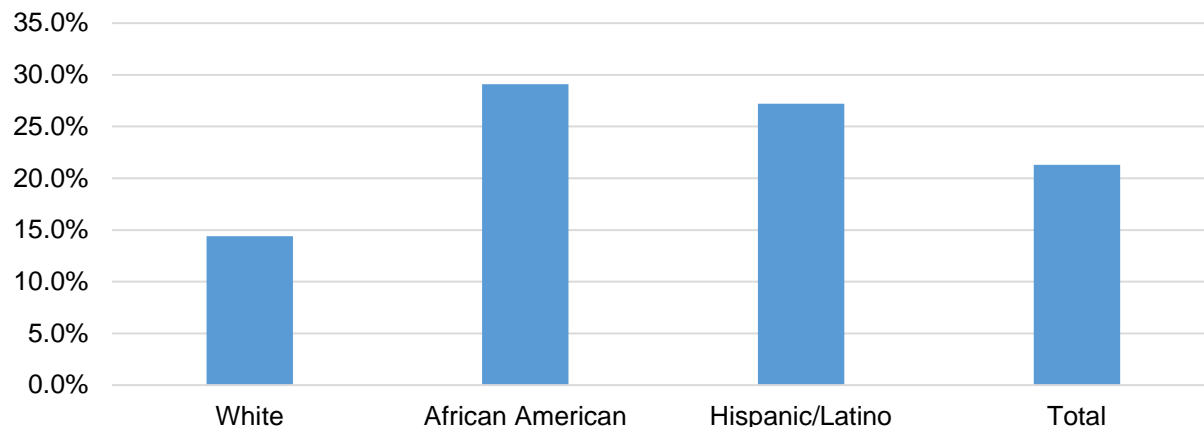


(Source: 2010 Census, AFFH Tool)

¹⁵ The United States Department of Housing and Urban Development defines cost-burdened families as those “who pay more than 30% of their income for housing” and “may have more difficulty affording necessities such as food, clothing, transportation, and medical care.” Severe cost burden is defined as paying more than 50% of one’s income for housing.

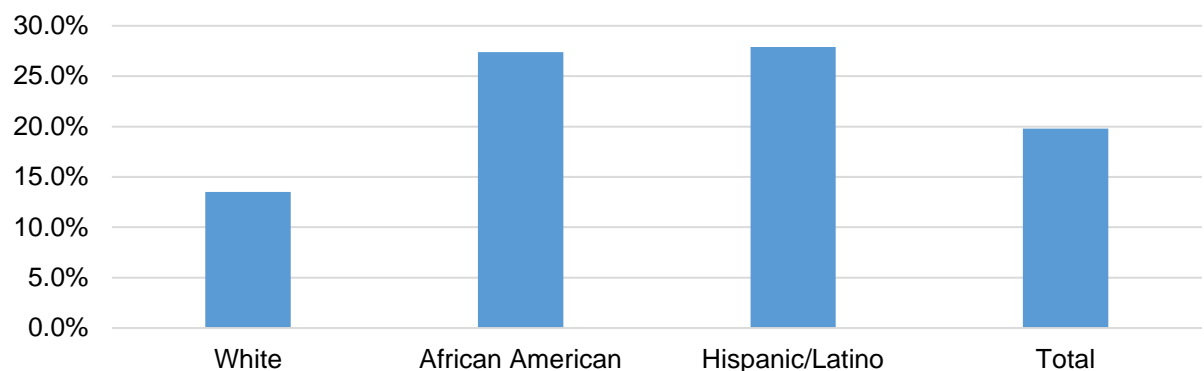
Source: HUD Office of Policy Research and Development, “Rental Burdens: Rethinking Affordability Measures,” Edge Magazine, Accessed via: https://www.huduser.gov/portal/pdredge/pdf_edge_article_092214.html

Figure 9: Households Experiencing Severe Housing Problems by Race & Ethnicity in the City of Cleveland Heights, 2010



(Source: 2010 Census, AFFH Tool)

Figure 10: Households Experiencing Severe Housing Cost Burden by Race & Ethnicity in the City of Cleveland Heights, 2010



(Source: 2010 Census, AFFH Tool)

Residents who are housing cost-burdened often face housing insecurity. Some make sacrifices in other areas of their household budget such as groceries, utilities, or medication to ensure they maintain their housing. Others who are unable to do so may face eviction or homelessness.

In the City of Cleveland Heights, 47.1% of renters are cost-burdened. Within Cleveland Heights, the Center Mayfield area, Fairmount Taylor neighborhood, and Severance Center (census tracts 1403.02, 1415, and 1408) have the highest percentage of renters who spend 30 to 34.9% of their income on housing (17.6%, 14.8%, and 14.6% respectively; see Table 23). City Center, the neighborhood on the northern end of Noble Road, the Center Mayfield area, and Cain Park (census tracts 1407.01, 1401, 1404, and 1407.02) have the highest percentage of renters who spend 35% or more of their income on housing (62.7%, 57.4%, 55.5%, and 55.5% respectively). City Center, northern Noble neighborhood, and the northwest Monticello area (census tracts 1407.01, 1401, and 1403.01) have the highest total percentage of housing cost-burdened renters (74.8%, 70.3% and 57.0% respectively).

Table 23: Renter Households Experiencing Cost Burden by Census Tract in the City of Cleveland Heights, 2017

Census Tract	Percentage Who Spent 30 to 34.9% of Their Gross Income on Housing	Percentage Who Spent 35% or More of Their Gross Income on Housing	Total Percentage that is Cost-Burdened
1401	12.9	57.4	70.3
1403.01	1.8	55.2	57.0
1403.02	17.6	26.7	44.3
1404	0.0	55.5	55.5
1405	3.2	52.9	56.1
1406	0.0	37.9	37.9
1407.01	12.1	62.7	74.8
1407.02	1.3	55.5	56.8
1408	14.6	27.1	41.7
1409	5.2	51.3	56.5
1410	9.8	41.6	51.4
1411	10.7	31.1	41.8
1412	8.4	30.0	38.4
1413	0.0	39.6	39.6
1414	8.5	22.0	30.5
1415	14.8	36.8	51.6
1416.01	5.1	14.1	19.2
1416.02	2.8	22.0	24.8
1417	13.0	0.0	13.0
1960	6.8	43.2	50.0

(Source: 2017 American Community Survey 5-Year Estimates)

Within Cleveland Heights, northwestern Monticello neighborhood, Noble neighborhood, and Severance Center (census tracts 1403.01, 1405, and 1408) have the highest percentage of homeowners with a mortgage who spend 30 to 34.9% of their income on housing (19.6%, 11.8%, and 11.2% respectively; see Table 24). The Cain Park, Noble, and Forest Hill neighborhoods (census tracts 1407.02, 1405, and 1960) have the highest percentage of homeowners with a mortgage who spend 35% or more of their income on housing (30.0%, 28.9%, and 28.6% respectively). Northwestern Monticello, Noble, and Forest Hill neighborhoods (census tracts 1403.01, 1405, and 1960) have the highest total percentage of housing cost-burdened homeowners with a mortgage (47.9%, 40.7%, and 38.7% respectively). In the City of Cleveland Heights, 28.6% of homeowners with a mortgage are cost-burdened.

Table 24: Owner Households with a Mortgage Experiencing Cost Burden by Census Tract in the City of Cleveland Heights, 2017

Census Tract	Percentage Who Spent 30 to 34.9% of Their Gross Income on Housing	Percentage Who Spent 35% or More of Their Gross Income on Housing	Total Percentage that is Cost-Burdened
1401	9.6	28.3	37.9
1403.01	19.6	28.3	47.9
1403.02	3.7	26.6	30.3
1404	10.9	9.3	20.2
1405	11.8	28.9	40.7
1406	3.9	26.7	30.6
1407.01	4.6	27.6	32.2
1407.02	4.8	30.0	34.8
1408	11.2	23.5	34.7
1409	6.6	18.7	25.3
1410	0.0	25.8	25.8
1411	8.9	21.8	30.7
1412	4.2	17.6	21.8
1413	3.4	17.2	20.6
1414	3.2	12.7	15.9
1415	3.4	25.0	28.4
1416.01	4.5	10.6	15.1
1416.02	5.0	24.0	29.0
1417	5.1	18.4	23.5
1960	10.1	28.6	38.7

(Source: 2017 American Community Survey 5-Year Estimates)

Within Cleveland Heights, Cedar Fairmount neighborhood, Forest Hill neighborhood, and Noble neighborhood (census tracts 1414, 1960, and 1405) have the highest percentage of homeowners without a mortgage who spend 30 to 34.9% of their income on housing (9.0%, 7.5%, and 6.8% respectively; see Table 25). Center Mayfield, northern Noble neighborhood, and Cain Park (census tracts 1403.02, 1401, and 1407.02) have the highest percentage of homeowners without a mortgage who spend 35% or more of their income on housing (28.6%, 27.7%, and 27.2% respectively). Cain Park, Center Mayfield, and northern Noble neighborhood (census tracts 1407.02, 1403.02, and 1401) have the highest total percentage of housing cost-burdened homeowners without a mortgage (32.5%, 28.6%, and 27.7% respectively). In the City of Cleveland Heights, 16.8% of homeowners without a mortgage are cost-burdened.

Table 25: Owner Households without a Mortgage Experiencing Cost Burden by Census Tract in the City of Cleveland Heights, 2017

Census Tract	Percentage Who Spent 30 to 34.9% of Their Gross Income on Housing	Percentage Who Spent 35% or More of Their Gross Income on Housing	Total Percentage that is Cost-Burdened
1401	0.0	27.7	27.7
1403.01	0.0	17.2	17.2
1403.02	0.0	28.6	28.6
1404	2.4	19.8	22.2
1405	6.8	3.2	10.0
1406	0.0	12.5	12.5
1407.01	0.0	13.5	13.5
1407.02	5.3	27.2	32.5
1408	6.7	0.0	6.7
1409	2.7	23.0	25.7
1410	0.0	0.0	0.0
1411	0.0	12.3	12.3
1412	0.0	2.7	2.7
1413	2.9	17.0	19.9
1414	9.0	3.9	12.9
1415	3.8	13.0	16.8
1416.01	3.8	22.0	25.8
1416.02	0.0	0.0	0.0
1417	0.0	17.2	17.2
1960	7.5	9.5	17.0

(Source: 2017 American Community Survey 5-Year Estimates)

E. Eviction

Residents with limited income who are unable to maintain their rental obligations often face eviction. Limited income typically also limits their ability to obtain legal counsel to represent them in court. In 2017, 893 total eviction cases were filed in Cleveland Heights Municipal Court.¹⁶ According to Eviction Lab, the eviction filing rate in Cleveland Heights is 4.11% (which represents the number of eviction filings per 100 renter homes).¹⁷ Given the increasingly common rental practice of denying tenancy to those with prior evictions, particularly recent evictions, Cleveland Heights residents who have faced eviction may struggle to maintain residence in the City.

F. Low-Income Housing

There are five low-income housing programs in Cleveland Heights: Project-Based Section 8, Housing Choice Voucher Program (HCVP), 202/PRAC, 811/PRAC, and the Low-Income Housing Tax Credit Program (LIHTC). Cuyahoga Metropolitan Housing Authority manages the Project-Based Section 8 program and administers the majority of Housing Choice Vouchers in Cuyahoga County. In 2018, there were 1,887 total low-income housing units in Cleveland Heights, which comprise 9.9% of total housing units in the City (see Table 26 and Figures 11 and 12; LIHTC data from 2016). Nearly 4% of total housing units are Project-Based Section 8 units (3.6%) and 3.8% of total housing units are HCV program units. LIHTC units make up 2.8% of total housing units. Housing programs, 202/PRAC and 811/PRAC, constitute 0.3% and 0.2% respectively of total housing units in the City. Cleveland Heights has three Low-Income Housing Tax Credit properties, which provide 542 housing units with 381 units designated as low-income units. The LIHTC properties are Kensington Place Apartments, Musicians Towers, and Warrensville Community Apartments.¹⁸ Interviewees shared developers often pitch affordable units for senior housing in the City; many view senior housing as more “politically-palatable” than family-oriented affordable housing projects.

¹⁶ The Supreme Court of Ohio, *Forcible Entry and Detainer Overall Caseloads 2017: Cleveland Heights, Ohio Courts Statistical Report*, 2017, p. 216.

¹⁷ Eviction Lab, “Cleveland Heights,” Available at: <https://evictionlab.org/map/#/2016?geography=cities&bounds=-81.67,41.477,-81.463,41.551&locations=39,-81.505,41.437%2B3916014,-81.566,41.514>

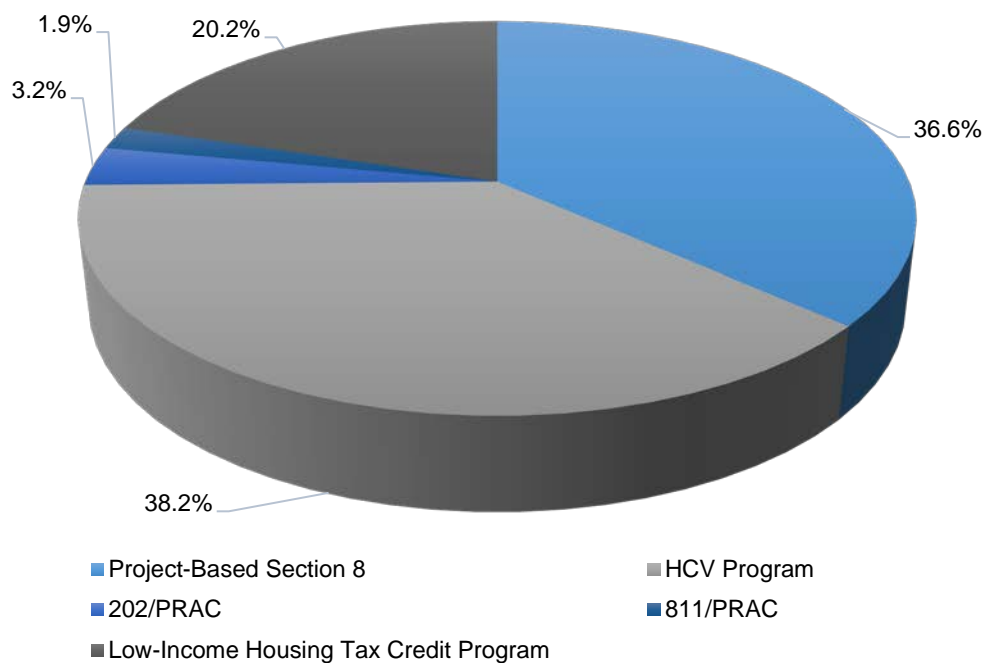
¹⁸ United States Department of Housing & Urban Development, “LIHTC Database Access, Cuyahoga County, Cleveland Heights” Accessed via: <https://lihtc.huduser.gov>

Table 26: Low-Income Housing Units by Program Category in the City of Cleveland Heights, 2018

Housing Units	Number	Percentage of Total Housing Units	Percentage of Supported Housing Units
Project-Based Section 8	690	3.6	36.6
Housing Choice Voucher Program	721	3.8	38.2
202/PRAC	60	0.3	3.2
811/PRAC	35	0.2	1.9
Low-Income Housing Tax Credit Program	381	2.0	20.2
Total Federally-Assisted Housing Units	1,887	9.9	100.0
Total Housing Units	19,041	100.0	N/A

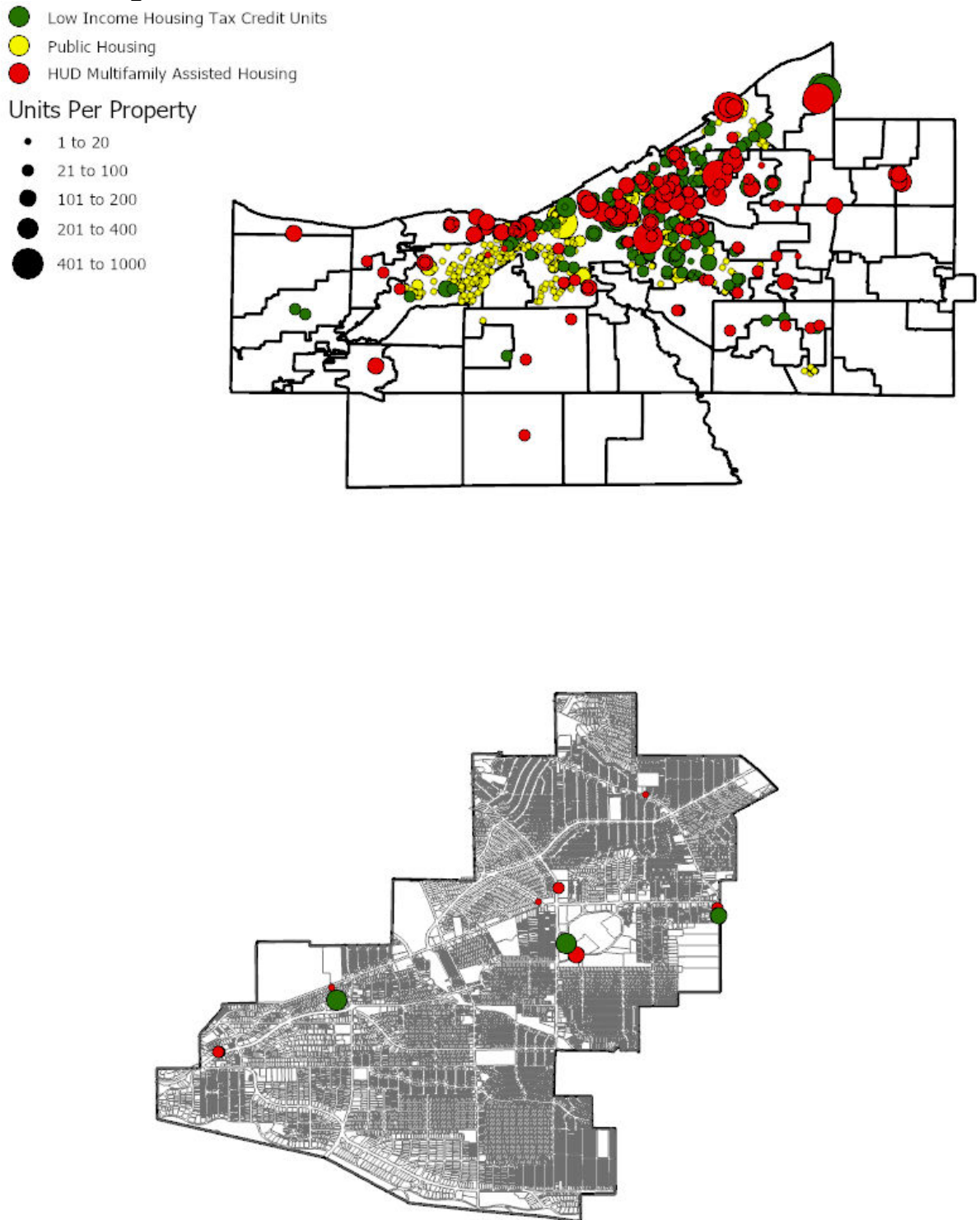
(Source: Picture of Subsidized Households 2018; LIHTC Database 2016; 2017 American Community Survey 5-Year Estimates)

Figure 11: Low-Income Housing Units by Program Category in Cleveland Heights, 2018



(Source: Picture of Subsidized Households 2018 and LIHTC Database 2016)

Figure 12: Low-Income Housing Units by Program Category in Cuyahoga County and Cleveland Heights, 2018



In Cleveland Heights, the majority of households utilizing federally assisted housing are African American households: 48.0% of Project-Based Section 8 households, 95.0% of HCV Program households, 71.0% of 202/PRAC households, and 52.0% of 811/PRAC households (see Table 27 and Figure 13). White households constitute 50.0% of Project-Based Section 8 households, 4.0% of HCV Program households, 22.0% of

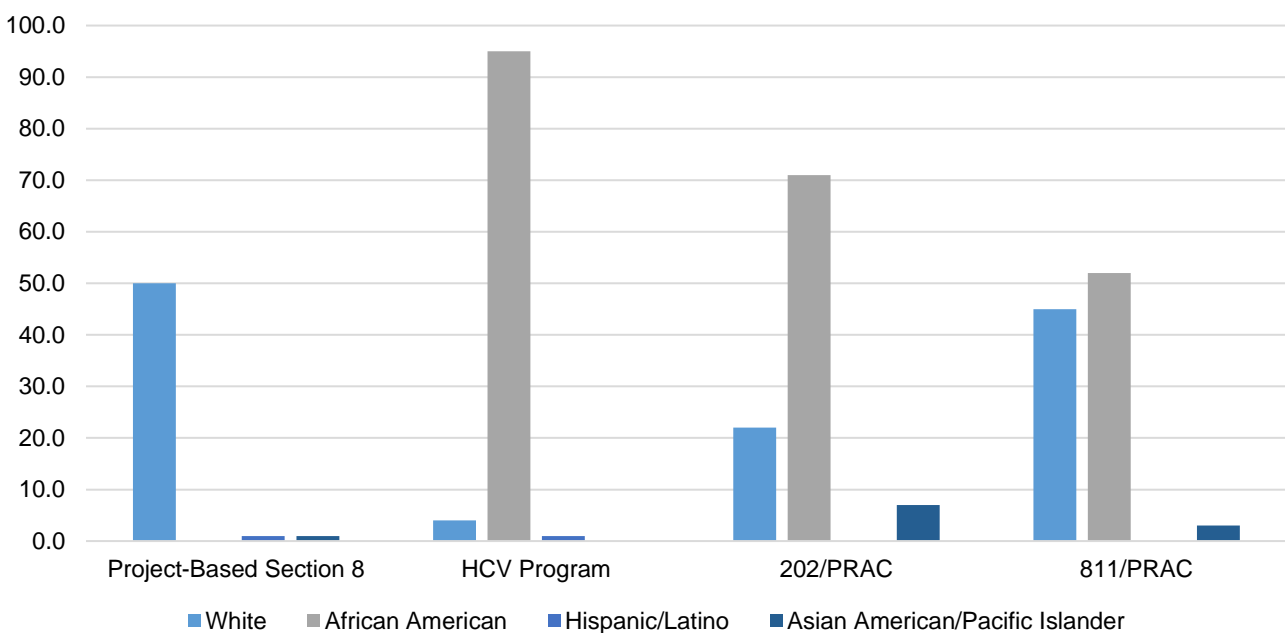
202/PRAC households program, and 45.0% of 811/PRAC households. Hispanic/Latino households comprise 1.0% of households in the HCV Program and 1.0% of households in Project-Based Section 8. Asian American households make up 1.0% of Project-Based Section 8 households, 7.0% of 202/PRAC households, and 3.0% of 811/PRAC households. Nearly thirty-one percent of African American renter households (30.7%) in Cleveland Heights receive a federal housing subsidy as compared to 10.3% of white renter households in Cleveland Heights.

Table 27: Federally Assisted Housing Residents by Race & Ethnicity in the City of Cleveland Heights, 2018

	White		African American		Hispanic/Latino		Asian American/ Pacific Islander	
Housing Type	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Project-Based Section 8	345	50.0	331	48.0	7	1.0	7	1.0
HCV Program	29	4.0	685	95.0	7	1.0	0	0.0
202/PRAC	13	22.0	43	71.0	0	0.0	4	7.0
811/PRAC	16	45.0	18	52.0	0	0.0	1	3.0
Total	403	N/A	1,077	N/A	14	N/A	12	N/A
As % of Renter Households by Race	N/A	10.3	N/A	30.7	N/A	4.3	N/A	1.4

(Source: Picture of Subsidized Households 2018; 2017 American Community-Survey 5-Year Estimates)

Figure 13: Federally Assisted Housing Residents by Race & Ethnicity in the City of Cleveland Heights, 2018



(Source: Picture of Subsidized Households, 2018)

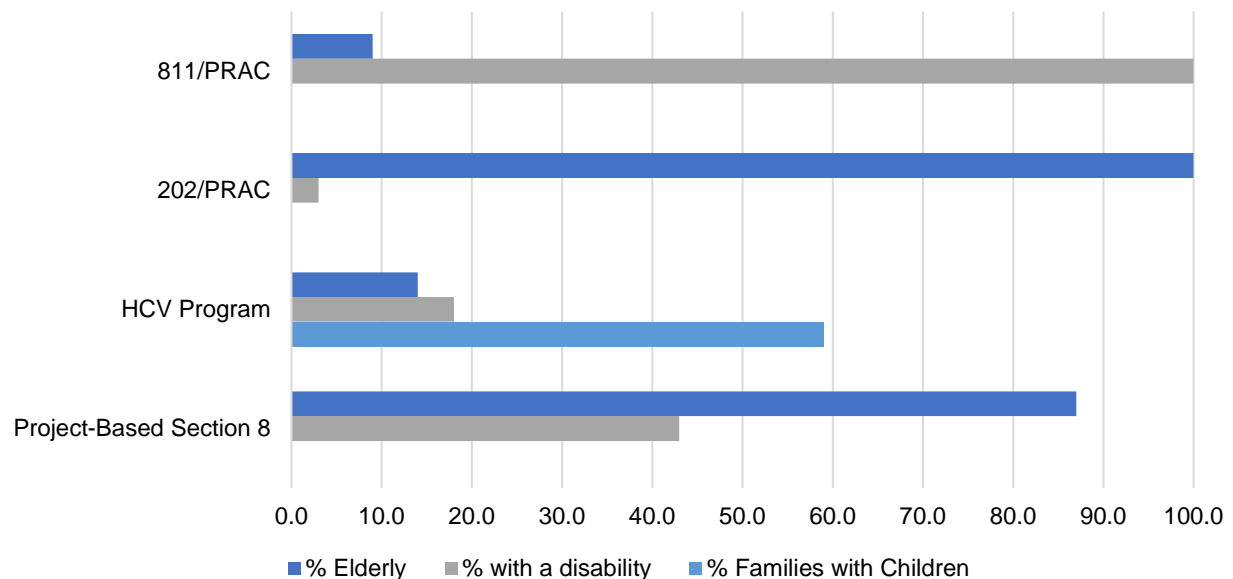
Most Project-Based Section 8 units are occupied by elderly (87.0%) and 43.0% of residents have a disability (see Table 28 and Figure 14). Fifty-nine percent of HCV Program units are occupied by families with children. Eighteen percent of HCV Program residents have a disability and 14% are elderly. All 202/PRAC program residents are elderly individuals and three percent of residents have a disability. Nine percent of residents in the 811/PRAC program are elderly and all residents have a disability (100.0%).

Table 28: Demographics of Federally Assisted Housing by Program Category, City of Cleveland Heights, 2018

	Total # of units	% Elderly	% with a disability	% White	% African American	% Hispanic/Latino	% Asian American/Pacific Islander	% Families with Children
Project-Based Section 8	690	87.0	43.0	50.0	48.0	1.0	1.0	0.0
HCV Program	721	14.0	18.0	4.0	95.0	1.0	0.0	59.0
202/PRAC	60	100.0	3.0	22.0	71.0	0.0	7.0	0.0
811/PRAC	35	9.0	100.0	45.0	52.0	0.0	3.0	0.0

(Source: Picture of Subsidized Households, 2018)

Figure 14: Demographics of Federally Assisted Housing by Program Category, City of Cleveland Heights, 2018



(Source: Picture of Subsidized Households, 2018)

Within Cleveland Heights, Severance Center, Coventry Village, and Center Mayfield (census tracts 1408, 1411, and 1403.02) have the greatest total number of federally assisted housing units (409 units, 300 units, and 188 units respectively; see Table 29) and the greatest number of Project-Based Section 8 units (390 units, 192 units, and 105 units respectively). Caledonia neighborhood and Center Mayfield (census tracts 1403.01, 1404 and 1403.02) have the greatest number of HCV Program units (115 units, 101 units, and 83 units respectively). Coventry Village (census tract 1411) is the only census tract that has 202/PRAC units (60 units). Forest Hill neighborhood, Coventry Village, and Noble neighborhood (census tracts 1960, 1411, and 1405) have 811/PRAC units (18 units, 11 units, and 6 units respectively).

Table 29: Federally Assisted Housing Units by Program Category and Census Tract in the City of Cleveland Heights, 2018

Census Tract	Total Federally-Assisted Housing Units	Project-Based Section 8	HCV Program	202/PRAC	811/PRAC
1401	48	0	48	0	0
1403.01	115	0	115	0	0
1403.02	188	105	83	0	0
1404	101	0	101	0	0
1405	69	1	62	0	6
1406	27	0	27	0	0
1407.01	70	0	70	0	0
1407.02	38	0	38	0	0
1408	409	390	19	0	0
1409	17	0	17	0	0
1410	49	1	48	0	0
1411	300	192	37	60	11
1412	4	1	3	0	0
1413	2	0	2	0	0
1414	0	0	0	0	0
1415	8	0	8	0	0
1416.01	2	0	2	0	0
1416.02	22	0	22	0	0
1417	7	0	7	0	0
1960	24	0	6	0	18

(Source: Picture of Subsidized Households 2018)

G. Housing Choice Voucher Program in Cuyahoga County

The Housing Choice Voucher Program, formerly the “Section 8 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 in Cuyahoga County, the Housing Choice Voucher Program contributes to racial segregation.¹⁹ The Cleveland-Elyria Metropolitan Statistical Area is the fifth most racially segregated urban

¹⁹ Lenore Healy and Michael Lepley, “Housing Choice Voucher Mobility in Cuyahoga County,” Housing Research & Advocacy Center (February 2016), 47. Available at: <http://www.thehousingcenter.org/wp-content/uploads/2016/02/Cuyahoga-County-Voucher-Mobility-Report.pdf>

region in the United States.²⁰ Nearly 1 in 8 African American households that rent in Cuyahoga County use a housing voucher (15,519 total voucher households in 2017; 13,657 African American households using vouchers).²¹ Accessing low-poverty neighborhoods improves the lives of people with low incomes. When HCVP participants have moved into low-poverty neighborhoods, they raised their incomes and employment rates, and participants showed better physical and mental health outcomes.²² Children who moved from a high-poverty to a low-poverty neighborhood achieve better educational attainment and have a higher income later in life.²³

When surveyed, many HCVP participants in Cuyahoga County expressed a desire to move to neighborhoods with low crime and high-performing schools, mentioning the “suburbs” as a preferred destination. For HCVP participants, the most (79.3%) reported obstacle to moving is that housing providers legally (in most jurisdictions) refuse to accept housing vouchers (Linndale, South Euclid, University Heights, and Warrensville Heights prohibit housing providers from refusing housing vouchers).²⁴

The Cuyahoga Metropolitan Housing Authority (CMHA) is the largest housing authority in Cuyahoga County, managing the largest housing choice voucher program (HCVP). Throughout Cuyahoga County, CMHA’s HCV program services 15,338 households as of 2018. Eighty-two percent of households are female-headed households, 44% of participants are households with children, 18% are elderly, and 23% of households have a member with a disability. Forty-two percent of households are female-headed households with children. The average annual income per household is \$12,080.²⁵

In 2018, 721 Housing Choice Voucher units were utilized in the City of Cleveland Heights. In Cleveland Heights, 87.0% of all HCVP households are female-headed households and 18.0% of households include a member who has a disability (see Table 30). Ninety-five percent of HCVP households in Cleveland Heights are African American and 1.0% are Hispanic/Latino. Fourteen percent of households have an elderly individual as head of household (individuals age 62 and older). Fifty-nine percent of households include children under the age of 18.

²⁰ Population Studies Center, “New Racial Segregation Measures for Large Metropolitan Areas: Analysis of the 1990-2010 Decennial Census,” University of Michigan. Available at: <http://www.psc.isr.umich.edu/dis/census/segregation2010.html>

²¹ United States Department of Housing and Urban Development, “Picture of Subsidized Households,” Available at: <https://www.huduser.gov/portal/datasets/assthsg.html>

²² Margery Turner, Austin Nichols, and Jennifer Comey, “Benefits of Living in High-Opportunity Neighborhoods: Insights from the Moving to Opportunity Demonstration,” Washington, D.C.: Urban Institute (2012).

²³ 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,” *American Economic Review*, vol. 106 (2016), 855-902.

²⁴ Lenore Healy and Michael Lepley, “Housing Voucher Mobility in Cuyahoga County,” Housing Research & Advocacy Center (February 2016), 27.

²⁵ Department of Housing & Urban Development, Picture of Subsidized Households, “Cuyahoga Metropolitan Housing Authority: Housing Choice Voucher Program,” 2018.

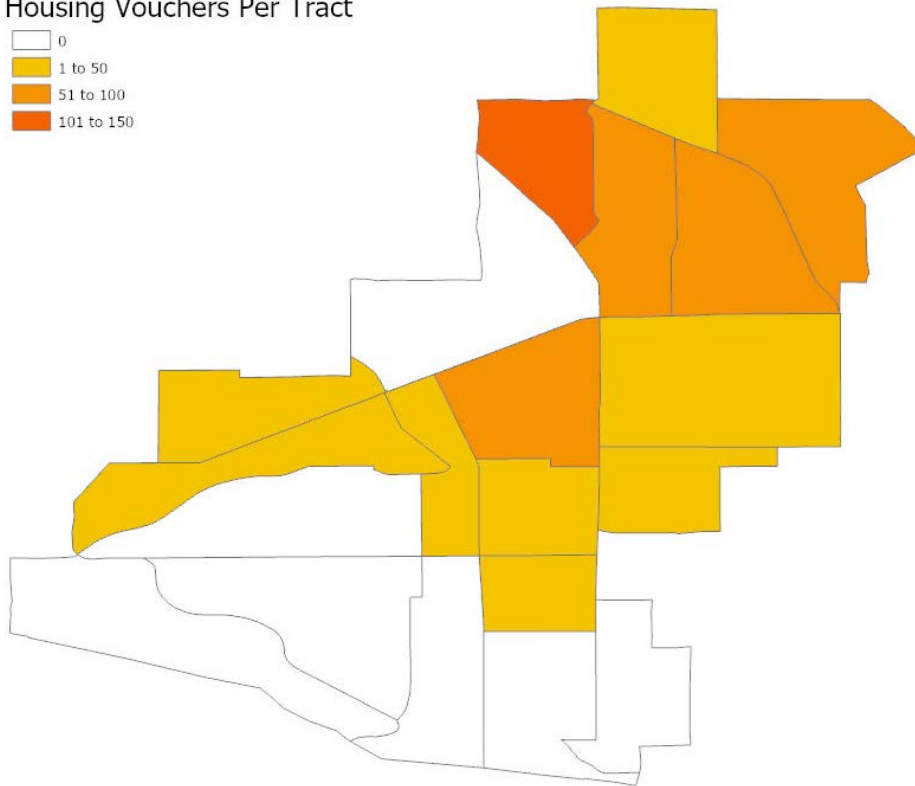
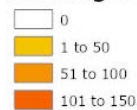
Table 30: Housing Choice Program Vouchers in Use in the City of Cleveland Heights, 2018

Voucher Holders in Cleveland Heights	Number	Percentage
Female-Headed Households	627	87.0
Households with a member having a disability	130	18.0
African American	685	95.0
Hispanic/Latino	7	1.0
Elderly-Headed Households	101	14.0
Households with Children under the age of 18	425	59.0

(Source: Picture of Subsidized Households 2018)

Figure 15: Location of Housing Voucher Program Participants in the City of Cleveland Heights, 2018

Housing Vouchers Per Tract



(Source: Picture of Subsidized Households 2018)

Forty percent of HCVP households in Cleveland Heights are employed (see Table 31). Two percent of voucher households in the City receive welfare as their primary source of income and fifty-five percent have other sources of income. The average family income for voucher households in Cleveland Heights is \$13,843.²⁶

²⁶ Department of Housing & Urban Development, Picture of Subsidized Households, "City of Cleveland Heights: Housing Choice Voucher Program," 2018.

Table 31: Housing Choice Program Participant Primary Source of Income in the City of Cleveland Heights, 2018

Voucher Holder Source of Income	Percentage
Employment	40.0
Welfare	2.0
Other Sources of Income	55.0

(Source: Picture of Subsidized Households, 2018)

Research by the Fair Housing Center has shown that housing providers renting units affordable to HCVP participants in Cuyahoga County, but outside of neighborhoods that already have a concentration of housing vouchers, refused to accept housing vouchers 91.2% of the time.²⁷ The Housing Choice Voucher Program, formerly the “Section 8 Program,” carries a racialized stigma based on widely held stereotypes, and “No Section 8” can serve as a proxy for race-based housing discrimination.²⁸ A Fair Housing Center report showed that housing providers who advertise that they do not accept housing vouchers were more likely to treat black renters (without vouchers) unfavorably than white renters (also not using vouchers) compared to housing providers who did not discriminate against vouchers in their ads.²⁹ Interviewees shared that residents with vouchers struggle to find housing with their voucher in the City. Landlords often do not accept a voucher; if vouchers are accepted, landlords often fail to do updates to the unit if the unit did not pass the inspection, which makes the unit ineligible to participate in the program. Cleveland Heights is home to a 4.7% of the housing vouchers in the County.³⁰ Between 2012 and 2018, the number of households using housing vouchers in Cleveland Heights fell 17.8% (see Figure 16).

²⁷ Michael Lepley & Lenore Mangiarelli, “Housing Voucher Discrimination and Race Discrimination in Cuyahoga County,” Housing Research & Advocacy Center (December 2017), 18, 26. Available at: <http://www.thehousingcenter.org/wp-content/uploads/2017/12/Voucher-and-Race-Discrimination.pdf>

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

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

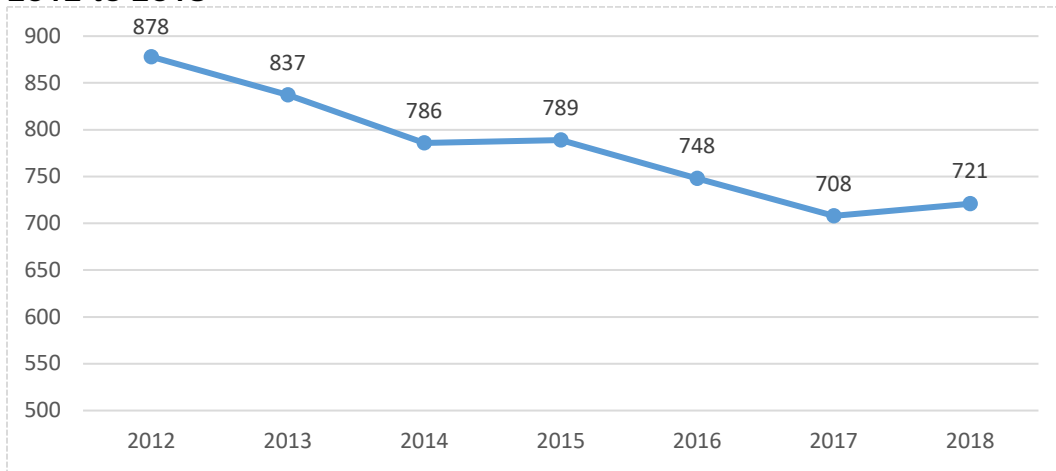
Paula Beck, “Fighting Section 8 Discrimination: The Fair Housing Act’s New Frontier,” *Harvard Civil Rights-Civil Liberties Review*, vol. 31 (1996), 155-186.

²⁹ Michael Lepley & Lenore Mangiarelli, “Housing Voucher Discrimination and Race Discrimination in Cuyahoga County,” Housing Research & Advocacy Center (December 2017), 13.

³⁰ United States Census Bureau, “Selected Housing Characteristics,” 2017 American Community Survey 5-Year Estimates, Cleveland Heights and Cuyahoga County.

United States Department of Housing and Urban Development, “Picture of Subsidized Households,” Cleveland Heights and Cuyahoga Metropolitan Housing Authority, 2018.

Figure 16: Housing Voucher Program Participants in the City of Cleveland Heights, 2012 to 2018



(Source: Picture of Subsidized Households 2018)

VIII. EDUCATION

Access to high-quality schools can be dictated by a household's capacity to afford housing in neighborhoods that are close to good schools. In order to attract new families and encourage families with children to remain in the suburb, a high-quality school district is essential.

Within Cleveland Heights, 65.0% of school-aged children attend public school and 35.0% attend private school (from pre-school through Grade 12).³¹ There are two public school districts in Cleveland Heights, Cleveland Heights-University Heights City School District and East Cleveland City Schools.

Cleveland Heights-University Heights City School District's State Report Card rating for the 2018-2019 academic school year designates an A, B, C, D, or F as its grading system for each district (see Table 32 and Table 33). Of the 10 schools in Cleveland Heights, no school received a Performance Index Grade of "A" or "B," two received a rating of "C", and eight received a rating of "D." The overall Performance Index Grade for the entire district was a rating of "D." Of the East Cleveland City Schools serving Cleveland Heights students one received a "D" and two received an "F." Overall, the district received an "F."

School ratings are based primarily on standardized test scores and graduation rates, which can be heavily influenced by race and class inequities. Studies have confirmed that highly rated schools often translate into higher housing values.³² A Redfin study showed that homes located near each other that have the same amenities (square footage and number of bedrooms and bathrooms) can vary by tens of thousands of dollars because they are served by different schools.³³ The National Fair Housing Alliance (NFHA) found that schools have become a proxy for the racial or ethnic composition of a neighborhood. A NFHA study revealed, through sales testing, the steering of potential homebuyers based on school quality.³⁴ Interviewees stated that on the home selling site, www.zillow.com, schools in Cleveland Heights have been "educationally redlined." Some realtors have steered buyers away from Cleveland Heights in the long-term, stating that by school age, families will want to move out of the City for a "better" school system. In 2015 HCC criticized Zillow's use of a color-coded, school district ranking map, provided by the nonprofit GreatSchools, comparing the map to mortgage redlining maps.³⁵ HCC successfully advocated for Zillow

³¹ U.S. Census Bureau, "Sex of School Enrollment by Level of School for the Population 3 Years and Over," American Community Survey 2017 5-Year Estimates, Cleveland Heights, Ohio.

³² Kendra Yoshinaga and Anya Kamenetz, "Race, School Ratings And Real Estate: A 'Legal Gray Area'," National Public Radio Education, October 2016, accessed via <https://www.npr.org/sections/ed/2016/10/10/495944682/race-school-ratings-and-real-estate-a-legal-gray-area>

³³ National Fair Housing Alliance, "Unequal Opportunity—Perpetuating Housing Segregation in America: 2006 Fair Housing Trends Report," April 2006, page 4, accessed via <https://nationalfairhousing.org/wp-content/uploads/2017/04/trends2006.pdf>

Nicole Zub, "School Quality and Property Values: Perpetuating Housing Segregation?" Law Street Media, October 2016, accessed via <https://www.lawstreetmedia.com/issues/law-and-politics/school-quality-vs-property-values-2/>

³⁴ Kendra Yoshinaga and Anya Kamenetz, "Race, School Ratings And Real Estate: A 'Legal Gray Area'," National Public Radio Education, October 2016, accessed via <https://www.npr.org/sections/ed/2016/10/10/495944682/race-school-ratings-and-real-estate-a-legal-gray-area>

³⁵ Ralph Day, *Educational Redlining: How Zillow and GreatSchools Profit from Suspect Ratings and Harm Communities*, Heights Community Congress. November 2015

to stop using color coded maps as an accompanying data source for home sale listings. Zillow still posts GreatSchools' numeric grading with individual listings.

Table 32: Cleveland Heights-University Heights City School District (serving Cleveland Heights students), 2018-2019 Report Card

School	Performance Index Grade	Performance Index Score	Indicators Met Count	Indicators Applicable Count	Indicators Met Percentage
Boulevard Elementary School	D	75.2	0	9	0.0%
Canterbury Elementary School	C	91.2	1	9	11.1%
Cleveland Heights High School	D	68.7	1	10	10.0%
Fairfax Elementary School	D	83.9	1	9	11.1%
Gearity Professional Development School	D	82.0	0	9	0.0%
Monticello Middle School	D	67.7	2	11	18.2%
Noble Elementary School	D	80.5	0	9	0.0%
Oxford Elementary School	D	70.1	0	8	0.0%
Roxboro Elementary School	C	91.0	0	9	0.0%
Roxboro Middle School	D	76.3	3	11	27.3%

(Source: Ohio Department of Education)

Table 33: East Cleveland City Schools (serving Cleveland Heights students), 2018-2019 Report Card

School	Performance Index Grade	Performance Index Score	Indicators Met Count	Indicators Applicable Count	Indicators Met Percentage
Caledonia Elementary School	D	64.2	0	10	0.0%
Heritage Middle School	F	54.8	2	9	22.2%
Shaw High School	F	47.2	0	10	0.0%

(Source: Ohio Department of Education)

There are nine private schools in the Cleveland Heights-University Heights School District, including two high schools, three preschools through eighth grade schools, one preschool through high school, one pre-school through sixth grade school, one kindergarten through tenth grade school, and one preschool and kindergarten school. Seven of the nine private schools have religious affiliations (see Table 34).

https://www.heightscongress.org/uploads/3/2/3/4/3234095/hcc_educational_redlining_greatschools_ratings_on_zillow.pdf

Table 34: Cleveland Heights-University Heights Private Schools, 2017-2018

School	Number of Students	School Type	Affiliation
Beaumont High School	436	High School	Roman Catholic
Communion of Saints School	238	Preschool-8th Grade	Roman Catholic
Gesu Elementary	711	Preschool-8th Grade	Roman Catholic
Hebrew Academy of Cleveland	725	Preschool-6th Grade	Jewish
Hebrew Academy of Cleveland-Jacob Sapirstein Campus	222	Kindergarten-10th Grade	Jewish
Horizon Montessori School	60	Preschool, Kindergarten	Unaffiliated
Lutheran High School East	267	High School	Lutheran
Mosdos OHR Hatorah Girl's Division/Yeshiva Derech Hatorah	512	Preschool-High School	Jewish
Ruffing Montessori School	319	Preschool-8th Grade	Unaffiliated

(Source: National Center of Education Statistics, 2017-2018)

In 2018, African American students comprised the majority of students in Cleveland Heights-University Heights City School District at 70.9% (see Table 35). White students make up 18.0% of the student population; Hispanic/Latino students, 3.7%; Asian American, 1.9%; and Multiracial, 5.5%. Students with disabilities make up 19.5% of the school population and 1.5% are English learners. In East Cleveland City Schools at 98.8% of the students are African American (see Table 36). White students make up 0.3% of the student population; Hispanic/Latino students, 0.4%; Asian American, 0.05%; and Multiracial, 0.4%. Students with disabilities make up 26.2% of the school population and 0.0% are English learners. Most students in Cleveland Heights-University Heights private schools are white (79.4%; see Table 37). African American students make up 15.8% of private school students in the district.

Research shows that social and economic disadvantages depress student performance; these disadvantages compound when students are concentrated in racially and economically homogenous schools.³⁶ In Cleveland Heights, students of color and of economic disadvantage are concentrated in the public school system. The majority of students of color attend public schools, whereas most white students attend private schools. In Cleveland Heights, 82% of public school students are children of color; nearly 21% (20.6%) attend private schools. Interviewees noted economic segregation exists between public and private schools in Cleveland Heights, stating families choose to send their children to private school if they can afford it.

³⁶ Richard Rothstein, "The Racial Achievement Gap, Segregated Schools, and Segregated Neighborhoods—A Constitutional Insult," *Race and Social Problems* 6 (4), November 2014.

Table 35: Cleveland Heights-University Heights City School District Enrollment by Subgroup (Racial/Ethnic), 2018-2019

Subgroup	Number	Percentage
American Indian/Alaskan Native	NC	NC
Asian American/Pacific Islander	99	1.9
African American	3,650	70.9
Hispanic/Latino	188	3.7
Multiracial	281	5.5
White	926	18.0
Students with Disabilities	1,004	19.5
Economic Disadvantages	5,148	100.0
English Learner	79	1.5
Migrant	NC	NC

(Source: Ohio Department of Education) *NC=Not Counted

Table 36: East Cleveland City Schools Enrollment by Subgroup (Racial/Ethnic), 2018-2019

Subgroup	Number	Percentage
American Indian/Alaskan Native	NC	NC
Asian American/Pacific Islander	1	0.05%
African American	1906	98.8%
Hispanic/Latino	7	0.4%
Multiracial	7	0.4%
White	6	0.3%
Students with Disabilities	505	26.2%
Economic Disadvantages	1912	99.1%
English Learner	0	0.0%
Migrant	NC	NC

(Source: Ohio Department of Education) *NC=Not Counted

Table 37: Cleveland Heights-University Heights Private School Enrollment by Subgroup (Racial/Ethnic) Excluding Pre-school, 2017-2018

School	Asian American	African American	Hispanic/Latino	White	Two or more races	Pacific Islander/ Native Hawaiian
Beaumont School	4	71	5	350	6	0
Communion of Saints School	2	87	2	132	3	0
Gesu Elementary	9	66	7	523	35	0
Hebrew Academy of Cleveland	0	0	0	514	0	0
Hebrew Academy of Cleveland: Jacob Sapirstein Campus	0	0	0	222	0	0
Horizon Montessori School	2	0	0	8	0	0
Lutheran High School East	0	240	0	19	8	0
Mosdos OHR Hatorah Girl's Division/Yeshiva Derech Hatorah	0	0	0	438	0	0
Ruffing Montessori School	18	11	6	180	37	0

(Source: National Center of Education Statistics, 2017-2018)

VIII. TRANSPORTATION

Access to transportation can have a significant impact on a household's housing choice; availability of transportation can affect where a household chooses to live as well as proximity to good schools and employment opportunities. Throughout the Cleveland metropolitan area, the Greater Cleveland Regional Transit Authority (RTA) is the primary source of public transit and services much of the Cleveland Heights suburb through busing and the Rapid rail.

Nearly seventy-six percent (75.6%) of the Cleveland Heights population drive alone to work and 6.9% carpool (see Table 38). Almost five percent (4.8%) of the population utilizes public transportation and 5.4% walk to work. Nearly five percent (4.8%) of the population work from home. Cleveland Heights has a walkability score of 54 per the website, walkscore.com. Walkscore analyzes how pedestrian-friendly an area is, based on the number of amenities within walking distance of most housing.

Table 38: Means of Transportation to Work in the City of Cleveland Heights, 2017

Means of Transportation	Number	Percent
Drove Alone	15,668	75.6
Carpooled	1,438	6.9
Public Transportation	986	4.8
Walked	1,120	5.4
Other Means	505	2.4
Worked at Home	999	4.8

(Source: 2017 American Community Survey 5-Year Estimates)

X. HOUSING DISCRIMINATION

A. Complaints

The federal Fair Housing Act affords individuals who have experienced housing discrimination three options for filing their complaint: 1) filing an administrative complaint with the U.S. Department of Housing and Urban Development (HUD), 2) filing a lawsuit in court, or 3) filing both the administrative complaint and lawsuit in court. Ohio fair housing law permits individuals to pursue remedies administratively with the Ohio Civil Rights Commission (OCRC) or in court. Ohio's fair housing law is designated as substantially equivalent to the federal statute. HUD refers most filed housing discrimination complaints in Cleveland Heights to the OCRC to investigate and pursue potential resolution. The OCRC not only investigates cases referred by HUD, but also accepts complaints filed directly with the agency.³⁷

Upon receiving the charge, the OCRC assigns it to an investigator, who researches the complaint and speaks with the parties and witnesses. The investigator reviews any available documentation to determine if there is probable cause of discrimination in the case. Upon receipt of the complaint, the OCRC offers the parties the opportunity to voluntarily mediate their dispute. If both parties agree, a mediator meets with both parties to identify a mutually satisfactory resolution. If no settlement is reached, the case continues in the investigation.³⁸

Once the investigator has reached a recommendation on the case, it is submitted for supervisory approval and given to the Commissioners, who must approve the report becoming a final OCRC determination. Based upon the review of the report and recommendation of the OCRC staff, the Commission determines a finding of "probable cause" or "no probable cause" of discrimination.

If the OCRC finds probable cause of discrimination, the OCRC offers the parties a final chance to resolve the issue through a conciliation process. If the dispute cannot be resolved, the case is referred to the Civil Rights Section of the Ohio Attorney General's Office to bring civil action before an administrative law judge, or in state court, if the parties request.

Cases filed with HUD and the OCRC are entered into the HUD Enforcement Management System (HEMS) database, run by HUD. According to HUD data, 13 fair housing complaints in the City of Cleveland Heights were filed from 2015 to 2018 (see Table 39 and Figure 17). From 2015 to 2018, the majority of complaints were filed on the bases of race (6 complaints, or 46.2%), disability (3 complaints, or 23.1%), sex (3 complaints, or 23.1%), and retaliation (1 complaint, or 7.7%).

³⁷ OCRC procedures are established in OCRC 4112.03-4112.06 and in the Ohio Administrative Code 4112-4-01 through 4112-3-17.

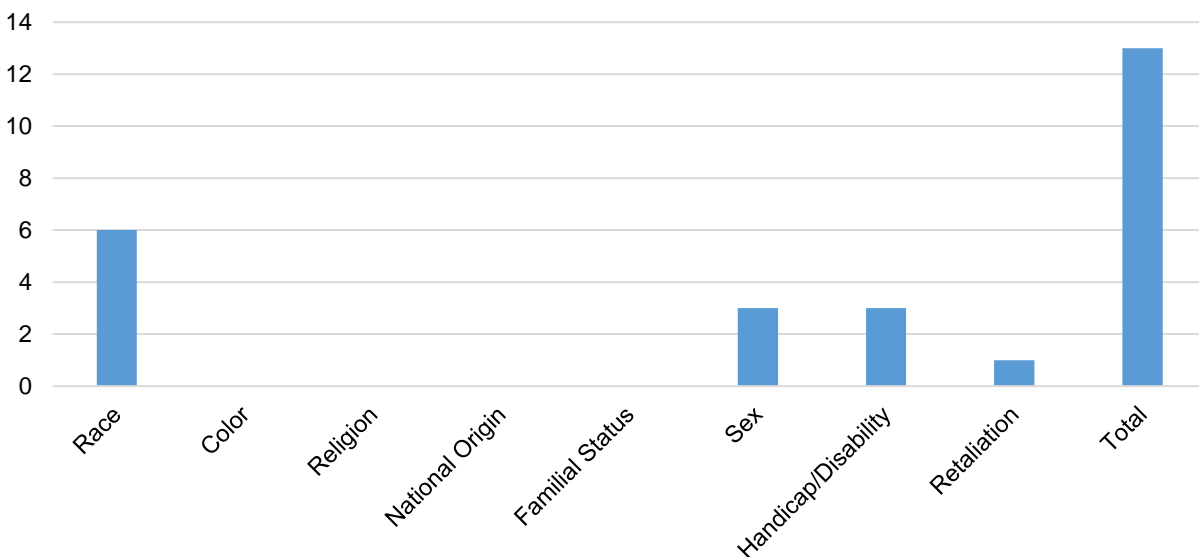
³⁸ The OCRC has the authority to demand access to records, documents, premises, evidence or possible sources of evidence, and to record the testimony or statements from the individuals. The agency also has the right to issue subpoenas, interrogatories, cease and desist orders, hold public hearings, and collect monetary benefits.

Table 39: Fair Housing Complaints Filed with HUD in the City of Cleveland Heights, 2015-2018

	Race	Color	Religion	National Origin	Familial Status	Sex	Handicap/ Disability	Retaliation	Total
2015	0	0	0	0	0	0	1	0	1
2016	3	0	0	0	0	1	1	0	5
2017	0	0	0	0	0	2	1	0	3
2018	3	0	0	0	0	0	0	1	4
Total	6	0	0	0	0	3	3	1	13

(Source: HUD HEMs Data. Data for the year of 2018 is as of 9/17/2019)

Figure 17: Fair Housing Complaints Filed with HUD in the City of Cleveland Heights, 2015-2018



(Source: HUD HEMs Data. Data for the year of 2018 is as of 9/17/2019)

B. Fair Housing Services

Controlled testing for housing discrimination is a well-recognized and effective way to determine the extent of discrimination within a given geography as well as provide evidence as to whether a housing provider violated fair housing laws. There are two types of fair housing testing:

- 1) Systemic testing that measures broader trends of discrimination within a given geography and
- 2) Complaint-based testing, which is done in response to a complaint to gather further evidence as to whether a housing provider violated fair housing law.

The majority of fair housing testing is conducted as controlled, matched-pair testing. This testing methodology, recommended by the U.S. Department of Housing and Urban Development, is used throughout the United States in rental, sales, insurance, and mortgage lending testing. In this testing method, two trained testers are given nearly identical profiles and are instructed to approach a housing provider to either rent, purchase, or obtain homeowners insurance or a mortgage loan. One tester is given a profile belonging to a protected class under the Fair Housing Act; however, both testers are not aware of

which tester is the protected class tester and which is the control, or non-protected class, tester. Following the test, each tester documents their experience and submits a written report to the test coordinator, who evaluates the reports and makes the initial determination as to whether it is probable that discrimination occurred. Some tests require follow-up testing to corroborate an initial probable cause finding or to clarify inconclusive results.

The City of Cleveland Heights contracts with Heights Community Congress (HCC) to do race and family status testing in Cleveland Heights. HCC is expanding to disability-based testing in conjunction with Maximum Accessible Housing of Ohio. The City coordinated an REI diversity training for all staff and hosts landlord-tenant trainings throughout the year.

C. Sexual Orientation and Gender Identity Housing Discrimination

Within Cuyahoga County, housing discrimination against the Lesbian, Gay, Bisexual, Transgender, and Queer (LGBTQ) community is a pervasive problem. Such discriminatory practices adversely impact quality of life, safety, and educational and economic opportunities. The Fair Housing Center conducted a study in 2016 that showed housing discrimination on the basis of sexual orientation in 35.2% of rental transactions using both email tests (discrimination in 12.5% of tests) and in-person tests (discrimination in 55.5% of tests). The Fair Housing Center uncovered housing discrimination on the basis of gender identity 32.1% of the time in email tests only. The Fair Housing Center was unable to complete on-site tests on the basis of gender identity, but based on the increased rate of discrimination between email and in-person tests on the basis of sexual orientation, it is likely that people who identify as transgender experience housing discrimination at a much higher rate.

Although the federal Fair Housing Act and Ohio fair housing law do not explicitly protect LGBTQ people from housing discrimination, the U.S. Department of Housing and Urban Development (HUD) has expanded fair housing policy to recognize housing discrimination on the basis of non-conformity with gender stereotypes as sex discrimination. Within Cuyahoga County, 19 municipalities have enacted fair housing ordinances banning housing discrimination on the basis of sexual orientation and 14 have done so on the basis of gender identity. In June 2018, Cuyahoga County Council established Ordinance 02018-009, enacting Chapter 206.13: Commission on Human Rights and Title 15: Anti-Discrimination to ensure equal opportunity and treatment for all citizens of Cuyahoga County including on the bases of sexual orientation and gender identity.³⁹ The City of Cleveland Heights does protect people from housing discrimination on the bases of sexual orientation and gender identity through Cleveland Heights' Fair Housing Ordinance.⁴⁰

³⁹ Cuyahoga County Code § 1501.01; Ordinance No. 02018-0009.

⁴⁰ Codified Ordinance of the City of Cleveland Heights § 749 (Ord. 123-2014. Passed 11-3-14.)

XI. MORTGAGE LENDING AND FORECLOSURES

A. Mortgage Lending

Cuyahoga County is one of the most racially segregated regions in the United States.⁴¹ Although there is demand for credit, people in predominantly African-American neighborhoods cannot get mortgages to buy homes in their neighborhoods.⁴² A Cleveland State University 2019 study reveals that banks and mortgage companies deny home purchase loans more often to African American applicants than white applicants in Northeast Ohio.⁴³ The denial of loans to predominantly African American neighborhoods results in decreasing property values and limiting the purchasing power of residents in the neighborhood, disadvantaging communities of color.⁴⁴ In 2017, the overall loan denial rate for white applicants in Northeast Ohio was 23%, whereas the loan denial rate for African Americans was nearly 50%. Key Bank and U.S. Bank had a loan denial disparity of more than 20% between African American and white applicants; Fifth Third Bank, Quicken Loans, and PNC Bank had a loan denial disparity of more than 15%.⁴⁵

With the advent of online lending, many predicted that racial and ethnic discrimination in mortgage lending would decrease.⁴⁶ However, research shows that online algorithms can be as biased as a loan officer; nationally, minorities pay 5.3 “basis points” (pre-paid interest) extra with online mortgage applications than do white borrowers. This means that Hispanic/Latino and African American borrowers

⁴¹ Population Studies Center, “New Racial Segregation Measures for Large Metropolitan Areas: Analysis of the 1990-2010 Decennial Census,” University of Michigan <http://www.psc.isr.umich.edu/dis/census/segregation2010.html>

⁴² Michael Lepley & Lenore Mangiarelli, “Cuyahoga County Mortgage Lending Patterns,” July 2018; <http://www.thehousingcenter.org/wp-content/uploads/2018/07/Cuyahoga-County-Mortgage-Lending-Patterns-2018-BEST-FOR-SCREEN.pdf>

Frank Ford, “Are Your Credit Needs Being Met in Cuyahoga County?: It May Depend on Where You Live,” Western Reserve Land Conservancy (presented at Ohio Fair Lending and Vital Communities Coalition and Cleveland State University’s Maxine Goodman Levin College of Urban Affairs: Brown Bag; “The Role of Communities in Community Benefit Agreements,” Cleveland, OH, June 21, 2017) <https://www.organizeohio.org/june-2017-brownbag-forum.html>

⁴³ Mark J. Salling, “Home Purchase Loans are Denied More Often for African American Applicants than White Applicants in Northeast Ohio,” Cleveland State University, April 2019: https://engagedscholarship.csuohio.edu/cgi/viewcontent.cgi?article=2605&context=urban_facpub

⁴⁴ Joe Pagonakis, “African Americans are denied home purchase loans more often than white applicants in NEO, CSU study shows,” April 2019: <https://www.news5cleveland.com/news/local-news/cleveland-metro/csu-study-shows-discrimination-against-african-american-home-loan-applicants>

⁴⁵ Joe Pagonakis, “CSU Report: African Americans denied home loans more often than white applicants,” October 2019: <https://www.news5cleveland.com/csu-report-african-americans-denied-home-loans-more-often-than-white-applicants>

⁴⁶ Annie Nova, “Online lending hasn’t removed discrimination, study finds,” November 27, 2018, CNBC: <https://www.cnn.com/2018/11/27/online-lenders-are-charging-minority-borrowers-more-study-concludes.html>

pay between \$250 and \$500 million extra in mortgage interest a year.⁴⁷ Mortgage lending data from 2016 showed that even when controlling for income, African American applicants are twice as likely to be denied a mortgage as white applicants are. Just over half (52%) of African American applications that were denied have no documented reason for the denial. Both African American and Hispanic/Latino homebuyers are 105% and 87% (respectively) more likely to be offered a high-cost mortgage for a home purchase, which puts them at greater risk of foreclosure.⁴⁸

Interviewees commented that racial disparities in mortgage lending do exist in the City and noted there are fewer bank branches in lower income areas of Cleveland Heights. A nonprofit in the City offers homebuyer and financial education classes to prepare families and individuals for the home-buying process and manages the City's \$10,000 down payment assistance program for eligible potential homebuyers.

The Fair Housing Center uses Lending Patterns, a Home Mortgage Disclosure Act data analysis tool, to detect racial disparities in mortgage lending. In 2018, the cumulative lending of mortgage lenders operating in Cleveland Heights regulated under HMDA failed 3 out of 4 available redlining tests designed by the Federal Financial Institutions Examination Council. The tests detected statistically significant racial disparities between mortgages on houses in majority Black tracts and mortgages for houses in majority white tracts in the following tests: loan approvals, subprime rate indicator, and loan withdrawal rate (for the results of all 4 tests see the Appendix, starting page 59). Of the top 10 mortgages lenders doing business in Cleveland Heights in 2018 (representing more than half of all lending), redlining was detected in only one test for one lender (see Appendix, page 63). This suggests that cumulative effect of all lending creates the effects of redlining in Cleveland Heights. For a list of the lenders that sold subprime mortgages in Cleveland Heights in 2018 (see Appendix, page 64).

B. Foreclosures

In 2018, the state of Ohio had the eighth highest foreclosure rate (0.63%) among all 50 states.⁴⁹ Ohio has been a leader in foreclosures for over a decade due, in part, to the rise of predatory lending. Foreclosures have a devastating effect on a household's ability to save, create wealth, and maintain financial stability. Cuyahoga County has a foreclosure rate of one in every 1,234 properties, the fifth highest foreclosure rate among Ohio counties as of November 2019.⁵⁰

The number of foreclosure filings in the City of Cleveland Heights from 2006 to 2012 reached above 450 filings until a sharp decline in 2013 (see Figure 18). Foreclosure filings climbed to 524 filings in 2008, but

⁴⁷ Robert, Bartlett, Adair Morse, Richard Stanton, and Nancy Wallace, "Consumer-Lending Discrimination in the FinTech Era*," University of California Berkeley, November 2019: <https://faculty.haas.berkeley.edu/morse/research/papers/discrim.pdf>

⁴⁸ Eylul Tekin, "Exploring Racial Discrimination in Mortgage Lending: A Call for Greater Transparency," June 2019: <https://listwithclever.com/real-estate-blog/racial-discrimination-in-mortgage-lending/>

⁴⁹ ATOM Data Solutions, "U.S. Foreclosure Activity Drops to 13-Year Low in 2018," January 15, 2019, Available at: <https://www.attomdata.com/news/most-recent/2018-year-end-foreclosure-market-report/>

⁵⁰ Realty Trac, "Ohio Real Estate Trends & Market Info," November 2019, Available at: <https://www.realtytrac.com/statsandtrends/foreclosuretrends/oh/>

declined by 69.3% from 2009 to 2018.⁵¹ The percent of parcels in Cleveland Heights with foreclosure filings is currently at its lowest (1.1%) since 2006 (see Table 40).

The City of Cleveland Heights is recovering from the foreclosure crisis a decade ago. There are 270 active foreclosure cases in Cleveland Heights, according to one interview. Many of the foreclosures are located in the Noble neighborhood, a neighborhood comprised of predominantly African American homeowners who were targeted by predatory lenders. The neighborhood was the hardest hit by the foreclosure crisis and has been the slowest to recover. Interviewees commented that over the last several decades, the Noble neighborhood was disinvested in through the loss of bank branches, businesses, and grocery stores previously located there, and finally, in its housing through the predatory lending crisis.

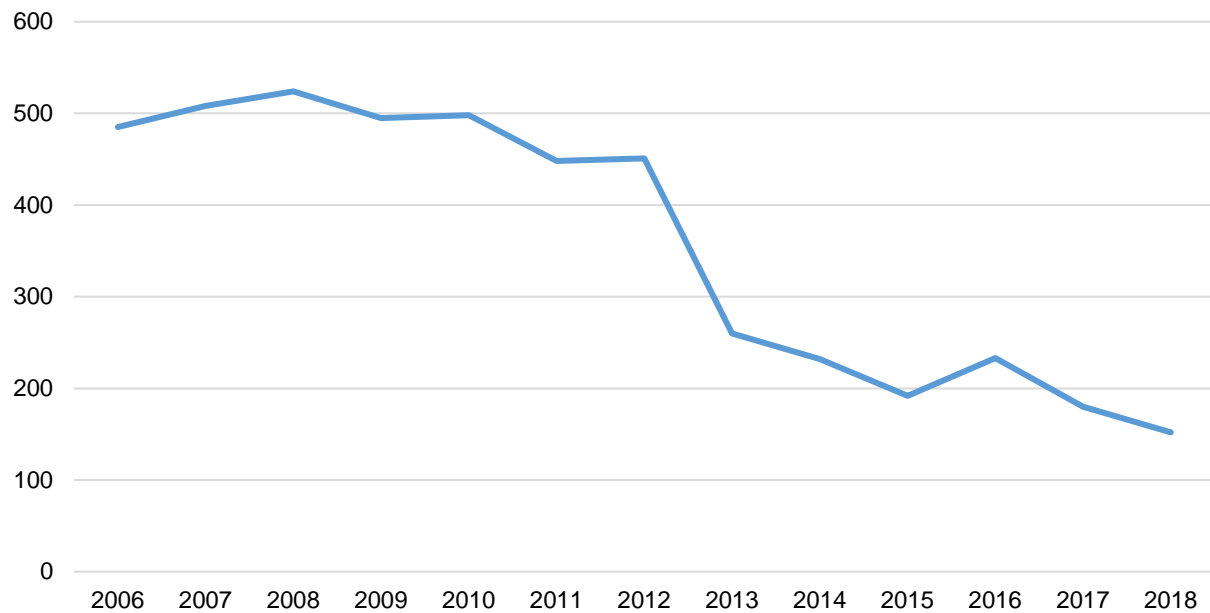
U.S. Bank is the largest bank with foreclosures in the City of Cleveland Heights. To address vacant and foreclosed U.S. Bank-owned homes in the Noble neighborhood, the Greater Cleveland Congregation Housing Taskforce collaborated with U.S. Bank on a program to repair these homes, facilitated by a local non-profit. In 2017, the City passed a foreclosure bond ordinance that addressed the issue of vacant bank-owned foreclosed properties, establishing that U.S. Bank put up a \$15,000 bond to maintain the exterior of these homes while in foreclosure. Currently, 46 of 270 foreclosures in the city have these bonds.

While mortgage foreclosures have decreased in the City since its height during the foreclosure crisis, there is now a growing number of tax foreclosures. Following the housing crisis, numerous out-of-state investors purchased foreclosed homes, renting out the homes and neglecting necessary home repairs. Many of the investor homes in the Noble Neighborhood are tax delinquent. After a 2019 home assessment walk-through of the neighborhood, 144 homes required exterior repair. Of those 144, 75 are tax delinquent and of these, 44 are investor-owned.

The City conducted demolitions of abandoned foreclosed homes that could not be rehabbed. An organization in the City has initiated an infill strategy for those neighborhoods hit with demolitions post-foreclosure crisis and plan to turn the vacant lots into new housing. Interviewees noted this is an opportunity for creating accessible new-build homes.

⁵¹ Frank Ford, "Housing Market Recovery in Cuyahoga County: Will Cleveland's East Side Be Left Behind? Housing Trends in Cuyahoga County 1995-2018," Western Reserve Land Conservancy, 2019.

Figure 18: Foreclosure Filings in the City of Cleveland Heights, 2006-2018



(Source: Frank Ford, "Housing Market Recovery in Cuyahoga County: Will Cleveland's East Side be Left Behind?" Western Reserve Land Conservancy, 2019)

Table 40: Concentration of Mortgage Foreclosures in the City of Cleveland Heights, 2006-2017 (Percent of Parcels with Filings)

2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017
3.0	3.1	3.3	3.1	3.1	2.8	2.8	1.6	1.4	1.2	1.4	1.1

(Source: Frank Ford, "Housing Market Recovery in Cuyahoga County: Race & Geography Still Matter," Western Reserve Land Conservancy, 2018)

XII. LOCAL ORDINANCES AND POLICIES

A. City of Cleveland Heights Fair Housing Ordinance

Fair housing laws exist at each level of government. The federal Fair Housing Act prohibits housing discrimination on the basis of race, color, religion, national origin, sex, familial status, or disability. Additionally, the State of Ohio prohibits discrimination based on ancestry and military status. The Cuyahoga County ordinance adds the protected bases of sexual orientation, gender identity, and age. The City of Cleveland Heights fair housing ordinance prohibits discrimination based on race, color, religion, national origin, sex, familial status, disability, gender identity, and sexual orientation (see Table 41).⁵²

Table 41: Protected Classes under the Federal Fair Housing Act, Ohio Fair Housing Law, Cuyahoga County Ordinance, and the City of Cleveland Heights Fair Housing Ordinance, 2019

Protected Class	Federal	State	Cuyahoga County	City of Cleveland Heights
Race	X	X	X	X
Color	X	X	X	X
Religion	X	X	X	X
National Origin	X	X	X	X
Sex/Gender	X	X	X	X
Familial Status	X	X		X
Handicap/Disability	X	X	X	X
Ancestry		X	X	
Military Status		X	X	
Age			X	
Creed				
Marital Status				
Gender Identity			X	X
Sexual Orientation			X	X
Physical Characteristic				
Statute/Ordinance	42 U.S.C. § 3601	O.R.C. § 4112.02	§ 206.13 & Title 15 (Ordinance No. 02018-0009)	§ 749
Fair Housing Board			Y	Y
Complaint Process	Y	Y	Y	Y

While the enactment of a local fair housing ordinance by a city or village does not in itself increase fair housing choice, particularly if the ordinance does not expand upon the protected classes in federal or state law, such ordinances can serve as a signal to local residents that the jurisdiction is concerned about housing discrimination.

The City of Cleveland Heights established a Fair Practices Board and a Complaint Officer in Ordinance 749. Any person can file a complaint with the Complaint Officer within 180 days after an alleged incident of

⁵² Codified Ordinance of the City of Cleveland Heights § 749 (Ord. 123-2014. Passed 11-3-14.)

discrimination has occurred or after the discriminatory practice has terminated.⁵³ The Complaint Officer conducts an investigation and can facilitate conciliation between the parties. Following the initial investigation, the Officer issues a recommendation to the Fair Practices Board, whose members will review and make a determination regarding the case.⁵⁴ The respondent (individual or organization that discriminated or has a discriminatory policy or practice) can receive a civil penalty of various financial fines for the discriminatory action.⁵⁵

B. City of Cleveland Heights “Good Neighbor Guide”

The City of Cleveland Heights created a publication, *Good Neighbor Guide for Residents of Cleveland Heights*, that outlines information on refuse, recycling, curfew, pets, noise, parking, and income tax, among other things to help residents of the city “be good neighbors.”⁵⁶ This guide, while on its face may be informing residents about neutral policies, does highlight issues that may disproportionately affect renters of color in the city. For example, the guide details policies concerning curfew for juveniles and noise regulations, which may disparately impact certain groups of residents. Juveniles found guilty of curfew violations are referred to Juvenile Court. Curfew varies depending on age range.⁵⁷ The City of Cleveland Heights refers those charged with curfew violations to juvenile court.⁵⁸ The City’s curfew ordinance states that parents will be fined \$50 for their child’s curfew violation, which must be paid within 30 days and if not, will incur a 1.5% interest per month and could go to debt collection.⁵⁹

Research shows that in 2011, African American youth were 269% more likely to be arrested for violating curfew laws than white juveniles were.⁶⁰ Curfew laws criminalize normal juvenile behavior, which can

⁵³ Codified Ordinance of the City of Cleveland Heights § 749.17 (Ord. 123-2014. Passed 11-3-14.)

⁵⁴ Codified Ordinance of the City of Cleveland Heights § 749.18 (Ord. 123-2014. Passed 11-3-14.)

⁵⁵ Codified Ordinance of the City of Cleveland Heights § 749.20 (Ord. 123-2014. Passed 11-3-14.)

⁵⁶ City of Cleveland Heights, “Good Neighbor Guide,” Publications; Accessed via <https://www.clevelandheights.com/DocumentCenter/View/231/Good-Neighbor-Guide-PDF?bidId=>

⁵⁷ Children under age 12 cannot be out on public streets, sidewalks, public parks, or public grounds from onset of darkness to 6:00 AM. Youth ages 12 to 15 cannot be out from 10:30 PM to 6:00 AM and teens ages 16 and 17 cannot be out between midnight and 6:00 am, with some exceptions. All curfew regulations are waived if the child is with a parent or guardian. An additional curfew restriction for those under 18 is restriction from public streets, highways, sidewalks, public parks or public grounds within the Coventry Village Business District or the Cedar Lee Business District between the hours of 6 PM and 6 AM. [Source: see Footnote 58]

⁵⁸ City of Cleveland Heights, “Curfew Ordinance,” City of Cleveland Heights Police Department, Accessed via: <https://www.clevelandheights.com/446/Curfew-Ordinance>

⁵⁹ Codified Ordinance of the City of Cleveland Heights § 531 (Ord. 87-2011. Passed 7-5-11.)

⁶⁰ The Sentencing Project, “Disproportionate Minority Contact in the Juvenile Justice System,” Policy Brief, May 2014; Accessed via <https://www.sentencingproject.org/wp-content/uploads/2015/11/Disproportionate-Minority-Contact-in-the-Juvenile-Justice-System.pdf>

unnecessarily introduce youth, particularly youth of color, into the criminal justice system.⁶¹ A May 2018 report found that police discretionary encounters with youth were applied unevenly, disproportionately affecting youth of color. Such encounters with youth were initiated by police who “make on-the-spot assessments of young people’s proclivity for delinquency, prospects for rehabilitation, and overall moral character, ...with limited information, often falling back on racial and ethnic stereotypes.”⁶²

The City has a nuisance ordinance that prohibits residents from making unreasonably loud noise, citing such behavior as a nuisance activity.⁶³ The *Good Neighbor* guide highlights the possibility of a citation for loud noise and states that if cited twice, “you may have to look for a new place to live, as your landlord might evict you. Most landlords screen out tenants with a history of eviction, so it could be a difficult search (for new housing).” The guide also states that if the landlord evicts the resident who received the citation, the administrative costs associated with the citation may be waived.⁶⁴ While the nuisance abatement ordinance does highlight loud noise as a nuisance activity, the ordinance does not stipulate that a landlord evict a cited resident or that fees would be waived if a landlord evicts the resident.⁶⁵ The guide thus encourages application of the nuisance ordinance toward eviction of the cited resident and highlights the incentive of landlords to evict in order to save on the administrative costs of the nuisance citation. Eviction has a devastating impact on a resident’s housing security and ability to find new housing in the future. The subsequent housing instability that follows eviction can place an individual or family in increasingly vulnerable situations, such as homelessness, unsafe housing, inability to find new housing given their eviction record, loss of job, or disruption of children’s schooling.⁶⁶

C. City of Cleveland Heights Criminal Activity Nuisance Ordinance

The City of Cleveland Heights has a criminal activity nuisance ordinance.⁶⁷ Criminal activity nuisance ordinances (CANOs) are municipal laws that penalize property owners for occurrences of crime and other “nuisance” behaviors on or near their property. These laws often classify specific behaviors as a nuisance and sometimes allow for a vague interpretation of what qualifies as a nuisance. In some municipalities, calling emergency services during a medical crisis can trigger action under a CANO. CANOs often define a timeline wherein if a specified number of “nuisance” activities occur the jurisdiction will compel the

⁶¹ The Marshall Project, “The Curfew Myth,” July 2018, Accessed via <https://www.themarshallproject.org/2018/07/31/the-curfew-myth>

⁶² Rod K. Brunson and Kashea Pegram, “ ‘Kids Do Not So Much Make Trouble, They Are Trouble:’ Police-Youth Relations,” Rutgers University School of Criminal Justice, May 2018; Accessed via <https://files.eric.ed.gov/fulltext/EJ1179177.pdf>

⁶³ Codified Ordinance of Cleveland Heights § 553 (Ord. 122-2015. Passed 11-2-15).

⁶⁴ City of Cleveland Heights, “Good Neighbor Guide,” Publications, page3; Accessed via <https://www.clevelandheights.com/DocumentCenter/View/231/Good-Neighbor-Guide-PDF?bidId=>

⁶⁵ Codified Ordinance of Cleveland Heights § 553 (Ord. 122-2015. Passed 11-2-15).

⁶⁶ Joseph Mead, et al, “Who is a Nuisance? Criminal Activity Nuisance Ordinances in Ohio,” Cleveland State University Office of Research (November 2017).

⁶⁷ Codified Ordinance of Cleveland Heights § 553 (Ord. 122-2015. Passed 11-2-15).

property owner to “abate” the nuisance or issue a penalty against the property owner. Abatement often comes in the form of a housing provider evicting a tenant; some city law directors actively encourage the use of eviction as a remedy for a property owner to avoid penalties. Penalties frequently come in the form of fines, billing property owners for the cost of city services, or misdemeanor charges against the property owner.⁶⁸

In Cleveland Heights, a citation and administrative and law enforcement costs are charged to the responsible party if two or more nuisances occur in a year on the same property or if one felony drug activity occurs on the property.⁶⁹ Threats of eviction or a nuisance citation may cause a victim to avoid calling the police for assistance, fearing a phone call for help could jeopardize their current and future housing options. For those with mental health problems, the housing instability that can result from eviction may further aggravate their vulnerable situation and lead to homelessness or institutionalization.⁷⁰

Research on CANOs has shown they often disproportionately affect people of color and people with disabilities, and can trigger the eviction of survivors of domestic violence.⁷¹ In several cases, cities with CANOs have been found to violate the Fair Housing Act on the basis of sex when CANO enforcement has caused the eviction of or other adverse actions against survivors of domestic violence.⁷²

In 2015, the City of Cleveland Heights removed domestic violence as a nuisance activity. While the removal of domestic violence is an important step, it does not guarantee survivors protection from the negative impacts of the CANO. Incidents of domestic violence can be mis-categorized as a “noise complaint” or “criminal activity” which can trigger a nuisance citation. A survivor could face housing insecurity, eviction, and even homelessness following the nuisance citation.⁷³

⁶⁸ Joseph Mead, et al, “Who is a Nuisance? Criminal Activity Nuisance Ordinances in Ohio,” Cleveland State University Office of Research (November 2017).

⁶⁹ Codified Ordinance of Cleveland Heights § 553 (Ord. 122-2015. Passed 11-2-15).

⁷⁰ Meghan Carter, “How Evictions from Subsidized Housing Routinely Violate the Rights of Persons with Mental Illness,” *Northwestern Journal of Law & Social Policy*, Vol. 5, Issue 1, Article 5, Spring 2010.

⁷¹ Priscilla Ocen, “The New Racially Restrictive Covenant: Race, Welfare, and the Policing of Black Women in Subsidized Housing,” *UCLA Law Review*, Vol. 59, n.6 (2012), 26.

Matthew Desmond and Nicol Valdez, “Unpolicing the Urban Poor: Consequences of Third-Party Policing for Inner-City Women,” *American Sociological Review* 78, no. 1 117-141 (2012).

Joseph Mead, et al, “Treating Neighbors as Nuisances: Troubling Applications of Criminal Activity Nuisance Ordinances,” 2018.

⁷² *Briggs v. Borough of Norristown, et al.* No. 2:13-cv-02191-ER *ED Pa. filed Apr. 29. 2013.

Nancy Markham v. City of Surprise, et al. 215-cv-01696-SRB Filed Sept. 2, 2015.

HOPE Fair Housing Center v. Peoria, Illinois. 1:17-cv-01360 Filed Aug. 10, 2017.

Rosetta Watson v. City of Maplewood, Missouri. 4:17-cv-1269 Filed April 7, 2017.

⁷³ National Housing Law Project, “Local Nuisance Ordinances and Their Impacts on Domestic Violence Survivors: An Introduction for Law Enforcement,” May 2019. Accessed via <https://www.nhlp.org/wp-content/uploads/2019.05.13-Nuisance-Fact-Sheet-for-Law-Enforcement.pdf>

XV. IMPEDIMENTS TO FAIR HOUSING CHOICE AND RECOMMENDATIONS

1. Impediment: The City of Cleveland Heights Has Limited Accessible Housing Options for People with Disabilities

The housing stock in Cleveland Heights is old (97.8% of all housing was built before 1990) and most homes are unlikely to be built to be accessible for people with physical disabilities. Additionally, approximately 90.0% of all housing with five or more units was built prior to 1980, before requirements under the Fair Housing Amendments Act required multi-family housing with four or more units be built with accessibility features. Regional demand for accessible housing far exceeds the availability of accessible units.

Recommendations:

- *Continue providing home improvement loans and rental restoration loans for owners and landlords with tenants with disabilities.*
- *Ensure that landlords are complying with the reasonable modification requirements for people with disabilities under the Fair Housing Act.*
- *Ensure that all new construction of covered multifamily housing is built in accordance with the Fair Housing Act Accessibility Guidelines and that public spaces comply with 504 and ADA requirements.*
- *Require that new single-family construction is built with accessibility features.*

2. Impediment: The City of Cleveland Heights' Fair Housing Ordinance does not Protect Housing Voucher Program Participants

Housing Choice Voucher units comprise 8.5% of all rentals in Cleveland Heights. Cleveland Heights is home to 4.7% of housing voucher participants in the County. Fair Housing Center research has shown that renters using Housing Choice Vouchers are denied housing by landlords in Cuyahoga County 9 out of 10 times. The population of housing voucher program participants in Cleveland Heights fell 17.8% between 2012 and 2018. Participants in the Housing Choice Voucher Program (HCVP) in Cuyahoga County are 89% African American. Discrimination against HCVP participants contributes to racial segregation in Cuyahoga County, and research shows that landlords who refuse to accept housing vouchers are more likely to discriminate against black renters in general.

Recommendation:

- *Amend the City's fair housing ordinance to prohibit discrimination against persons using housing choice vouchers by expanding Cleveland Heights' fair housing ordinance to include "source of income." Ensure that "source of income" is defined as including all lawful sources of income AND rental assistance from any federal, state, or locally administered benefit or subsidy program.*

3. Impediment: Criminal Activity Nuisance Ordinance

The City of Cleveland Heights has a criminal activity nuisance ordinance (CANO). In cities across the United States, CANO's have been shown to disproportionately affect people of color, people with disabilities, and survivors of domestic violence. The City of Cleveland Heights has already removed "domestic violence" as a nuisance activity as a way to protect survivors of domestic violence.

Recommendation:

- *Monitor enforcement of CANO implementation to ensure law is uniformly enforced and not disproportionately affecting protected groups.*
- *Stop threatening renters with removal under the CANO in the Good Neighbor Guide for Residents of Cleveland Heights.*

4. Impediment: Low-income residents of Cleveland Heights are displaced by eviction and housing costs.

In 2017, 47.1% of renters, 28.6% of owners with a mortgage, and 16.8% of owners without a mortgage were housing cost-burdened. In 2010 (last available year for data breakdown), 47.2% of African Americans living in Cleveland Heights experienced "housing problems" as defined by the Census Bureau, meaning almost half of African American households in the City are housing cost-burdened and live in a unit with a deficiency. In 2017 in Cleveland Heights, 893 households faced eviction.

Recommendation:

- *Require inclusion of affordable units in new multi-family construction.*
- *Continue to use CDBG and HOME dollars to build new affordable housing as funds allow.*
- *Consider implementing a "Right to Counsel" for eviction proceedings, i.e. publically provided representation in cases of evictions for household that cannot afford an attorney.⁷⁴*
- *Prioritize settlement between parties over eviction judgements in eviction cases.*

⁷⁴ Evictions increase family poverty, have been linked to increased risk of suicide and decreased childhood development, and cause of job loss. In New York City, increased access to legal assistance in civil cases was associated with a 24% decrease in evictions.

Source: Teresa Wiltz, "How Free Legal Help Can Prevent Evictions," Pew Charitable Trusts (October 2017): <https://www.pewtrusts.org/en/research-and-analysis/blogs/stateline/2017/10/27/how-free-legal-help-can-prevent-evictions>

5. **Impediment: Racial Disparities in Mortgage Lending**

There are continued disparities in mortgage lending in Cleveland Heights. African American and Hispanic/Latino borrowers in Cleveland Heights are less likely to be approved mortgages than white borrowers and more likely to receive subprime mortgages.

Recommendation:

- *Monitor lending practices in the City of Cleveland Heights to ensure compliance with fair housing and fair lending laws.*
- *Conduct fair lending testing and investigate complaints of discriminatory lending practices.*

Appendix

FFIEC Redlining Risk Factor R2 (Approval & Denial) Analysis: Cleveland Heights, All Lenders, 2018

Tract Majority Race*	# Tracts	Apps	Approvals	Approval Rate	Difference** (vs White)	z-statistic	p-value	Statistically Significant?***
White	8	763	471	61.73%	--	--	--	--
Black	11	969	513	52.94%	-8.79	-3.6659	0.0002	Yes
Hispanic	0	0	0	NA	NA	NA	NA	NA
Asian	0	0	0	NA	NA	NA	NA	NA
Native American	0	0	0	NA	NA	NA	NA	NA
Hawaiian	0	0	0	NA	NA	NA	NA	NA
Other	0	0	0	NA	NA	NA	NA	NA
MultiRace	0	0	0	NA	NA	NA	NA	NA
No Majority	1	54	26	48.15%	--	--	--	--
Total	20	1,786	1,010	56.55%	--	--	--	--
Majority Minority Tracts	12	1,023	539	52.69%	-9.04	-3.8133	0.0001	Yes
Majority Black/Hisp. Tracts	11	969	513	52.94%	-8.79	-3.6659	0.0002	Yes

Yellow shading identifies a row where the denial rate is higher than the denial rate in majority White tracts, and the difference is statistically significant.

Data are from the 2018 HMDA-LAR published by the FFIEC.

Purchases and applications without a census tract are excluded from the report.

*Majority Race Tracts are those where one race comprises >50% of the population. Majority Black/Hisp. tracts are those where >50% of population is either Black or Hispanic.

**Difference between the denial rate in majority White tracts and the denial rate in tracts that are not majority White (e.g. Majority Black, Majority Hispanic, Majority Minority etc.)

***Confidence level is 95%.

Tract Majority Race*	# Tracts	Apps	Denials	Denial Rate	Difference** (vs White)	z-statistic	p-value	Statistically Significant?***
White	8	763	160	20.97%	--	--	--	--
Black	11	969	242	24.97%	4.00	1.9597	0.0500	No
Hispanic	0	0	0	NA	NA	NA	NA	NA
Asian	0	0	0	NA	NA	NA	NA	NA
Native American	0	0	0	NA	NA	NA	NA	NA
Hawaiian	0	0	0	NA	NA	NA	NA	NA
Other	0	0	0	NA	NA	NA	NA	NA
MultiRace	0	0	0	NA	NA	NA	NA	NA
No Majority	1	54	16	29.63%	--	--	--	--
Total	20	1,786	418	23.40%	--	--	--	--
Majority Minority Tracts	12	1,023	258	25.22%	4.25	2.0985	0.0359	Yes
Majority Black/Hisp. Tracts	11	969	242	24.97%	4.00	1.9597	0.0500	No

Yellow shading identifies a row where the denial rate is higher than the denial rate in majority White tracts, and the difference is statistically significant.

Data are from the 2018 HMDA-LAR published by the FFIEC.

Purchases and applications without a census tract are excluded from the report.

*Majority Race Tracts are those where one race comprises >50% of the population. Majority Black/Hisp. tracts are those where >50% of population is either Black or Hispanic.

**Difference between the denial rate in majority White tracts and the denial rate in tracts that are not majority White (e.g. Majority Black, Majority Hispanic, Majority Minority etc.)

***Confidence level is 95%.

FFIEC Redlining Risk Factor R3 (Collateral Denial) Analysis: Cleveland Heights, All Lenders, 2018

Tract Majority Race*	# Tracts	Apps	Collateral Denials	Collateral Denial Rate	Difference** (vs White)	z-statistic	p-value	Statistically Significant?***
White	8	763	58	7.60%	--	--	--	--
Black	11	969	74	7.64%	0.04	0.0274	0.9782	No
Hispanic	0	0	0	NA	NA	NA	NA	NA
Asian	0	0	0	NA	NA	NA	NA	NA
Native American	0	0	0	NA	NA	NA	NA	NA
Hawaiian	0	0	0	NA	NA	NA	NA	NA
Other	0	0	0	NA	NA	NA	NA	NA
MultiRace	0	0	0	NA	NA	NA	NA	NA
No Majority	1	54	7	12.96%	--	--	--	--
Total	20	1,786	139	7.78%	--	--	--	--
Majority Minority Tracts	12	1,023	81	7.92%	0.32	0.2468	0.8050	No
Majority Black/Hisp. Tracts	11	969	74	7.64%	0.04	0.0274	0.9782	No

Collateral denials includes denials where the reason cited was 'collateral', either alone or in combination with other reasons.

Yellow shading identifies a row where the denial rate is higher than the denial rate in majority White tracts, and the difference is statistically significant.

Data are from the 2018 HMDA-LAR published by the FFIEC.

Applications without a census tract are excluded from the report.

*Majority Race Tracts are those where one race comprises >50% of the population. Majority Black/Hisp. tracts are those where >50% of population is either Black or Hispanic.

**Difference between the denial rate in majority White tracts and the denial rate in tracts that are not majority White (e.g. Majority Black, Majority Hispanic, Majority Minority etc.)

***Confidence level is 95%.

FFIEC Redlining Risk Factor R4 (Subprime Indicator) Analysis: Cleveland Heights, All Lenders, 2018

Tract Majority Race*	# Tracts	Originated Loans	Subprime Indicator**	Frequency	Difference*** (vs White)	z-statistic	p-value	Statistically Significant?****
White	8	461	21	4.56%	--	--	--	--
Black	11	453	79	17.44%	12.88	6.2389	0.0000	Yes
Hispanic	0	0	0	NA	NA	NA	NA	NA
Asian	0	0	0	NA	NA	NA	NA	NA
Native American	0	0	0	NA	NA	NA	NA	NA
Hawaiian	0	0	0	NA	NA	NA	NA	NA
Other	0	0	0	NA	NA	NA	NA	NA
MultiRace	0	0	0	NA	NA	NA	NA	NA
No Majority	1	24	1	4.17%	--	--	--	--
Total	20	938	101	10.77%	--	--	--	--
Majority Minority Tracts	12	477	80	16.77%	12.22	6.0342	0.0000	Yes
Majority Black/Hisp. Tracts	11	453	79	17.44%	12.88	6.2389	0.0000	Yes

Yellow shading identifies a row where the spread frequency is higher than the spread frequency in majority White tracts, and the difference is statistically significant.

Data are from the 2018 HMDA-LAR published by the FFIEC.

Applications without a census tract are excluded from the report.

*Majority Race Tracts are those where one race comprises >50% of the population. Majority Black/Hisp. tracts are those where >50% of population is either Black or Hispanic.

**Subprime Indicator = Reported spread on 1st lien \geq 1.5, or reported spread on 2nd lien \geq 3.5

***Difference between the frequency in majority White tracts and the frequency in tracts that are not majority White (e.g. Majority Black, Majority Hispanic, Majority Minority etc.)

****Confidence level is 95%.

FFIEC Redlining Risk Factor R5 (Application Fallout) Analysis: Cleveland Heights, All Lenders, 2018

Tract Majority Race*	# Tracts	Apps	Withdrawals	Withdrawal Rate	Difference** (vs White)	z-statistic	p-value	Statistically Significant?***
White	8	763	82	10.75%	--	--	--	--
Black	11	969	143	14.76%	4.01	2.4646	0.0137	Yes
Hispanic	0	0	0	NA	NA	NA	NA	NA
Asian	0	0	0	NA	NA	NA	NA	NA
Native American	0	0	0	NA	NA	NA	NA	NA
Hawaiian	0	0	0	NA	NA	NA	NA	NA
Other	0	0	0	NA	NA	NA	NA	NA
MultiRace	0	0	0	NA	NA	NA	NA	NA
No Majority	1	54	7	12.96%	--	--	--	--
Total	20	1,786	232	12.99%	--	--	--	--
Majority Minority Tracts	12	1,023	150	14.66%	3.92	2.4349	0.0149	Yes
Majority Black/Hisp. Tracts	11	969	143	14.76%	4.01	2.4646	0.0137	Yes

Yellow shading identifies a row where the withdrawal rate is higher than the withdrawal rate in majority White tracts, and the difference is statistically significant.

Data are from the 2018 HMDA-LAR published by the FFIEC.

Applications without a census tract are excluded from the report.

*Majority Race Tracts are those where one race comprises >50% of the population. Majority Black/Hisp. tracts are those where >50% of population is either Black or Hispanic.

**Difference between the withdrawal rate in majority White tracts and the withdrawal rate in tracts that are not majority White (e.g. Majority Black, Majority Hispanic, Majority Minority etc.)

***Confidence level is 95%.

Tract Majority Race*	# Tracts	Apps	Incompletes	Incomplete Rate	Difference** (vs White)	z-statistic	p-value	Statistically Significant?***
White	8	763	33	4.33%	--	--	--	--
Black	11	969	42	4.33%	0.01	0.0095	0.9924	No
Hispanic	0	0	0	NA	NA	NA	NA	NA
Asian	0	0	0	NA	NA	NA	NA	NA
Native American	0	0	0	NA	NA	NA	NA	NA
Hawaiian	0	0	0	NA	NA	NA	NA	NA
Other	0	0	0	NA	NA	NA	NA	NA
MultiRace	0	0	0	NA	NA	NA	NA	NA
No Majority	1	54	5	9.26%	--	--	--	--
Total	20	1,786	80	4.48%	--	--	--	--
Majority Minority Tracts	12	1,023	47	4.59%	0.27	0.2722	0.7855	No
Majority Black/Hisp. Tracts	11	969	42	4.33%	0.01	0.0095	0.9924	No

Yellow shading identifies a row where the incomplete rate is higher than the incomplete rate in majority White tracts, and the difference is statistically significant.

Data are from the 2018 HMDA-LAR published by the FFIEC.

Applications without a census tract are excluded from the report.

*Majority Race Tracts are those where one race comprises >50% of the population. Majority Black/Hisp. tracts are those where >50% of population is either Black or Hispanic.

**Difference between the incomplete rate in majority White tracts and the incomplete rate in tracts that are not majority White (e.g. Majority Black, Majority Hispanic, Majority Minority etc.)

***Confidence level is 95%.

FFIEC Redlining Risk Factor R2 (Approval & Denial) Analysis: Cleveland Heights, The Huntington National Bank, 2018

Tract Majority Race*	# Tracts	Apps	Approvals	Approval Rate	Difference** (vs White)	z-statistic	p-value	Statistically Significant***
White	8	81	50	61.73%	--	--	--	--
Black	11	99	46	46.46%	-15.26	-2.0421	0.0411	Yes
Hispanic	0	0	0	NA	NA	NA	NA	NA
Asian	0	0	0	NA	NA	NA	NA	NA
Native American	0	0	0	NA	NA	NA	NA	NA
Hawaiian	0	0	0	NA	NA	NA	NA	NA
Other	0	0	0	NA	NA	NA	NA	NA
MultiRace	0	0	0	NA	NA	NA	NA	NA
No Majority	1	3	0	0.00%	--	--	--	--
Total	20	183	96	52.46%	--	--	--	--
Majority Minority Tracts	12	102	46	45.10%	-16.63	-2.2376	0.0252	Yes
Majority Black/Hisp. Tracts	11	99	46	46.46%	-15.26	-2.0421	0.0411	Yes

Yellow shading identifies a row where the approval rate is lower than the approval rate in majority White tracts, and the difference is statistically significant.

Data are from the 2018 HMDA-LAR published by the FFIEC. Purchases and applications without a census tract are excluded from the report.

*Majority Race Tracts are those where one race comprises >50% of the population. Majority Black/Hisp. tracts are those where >50% of population is either Black or Hispanic.

**Difference between the approval rate in majority White tracts and the approval rate in tracts that are not majority White (e.g. Majority Black, Majority Hispanic, Majority Minority etc.)

***Confidence level is 95%.

Tract Majority Race*	# Tracts	Apps	Denials	Denial Rate	Difference** (vs White)	z-statistic	p-value	Statistically Significant***
White	8	81	14	17.28%	--	--	--	--
Black	11	99	33	33.33%	16.05	2.4388	0.0147	Yes
Hispanic	0	0	0	NA	NA	NA	NA	NA
Asian	0	0	0	NA	NA	NA	NA	NA
Native American	0	0	0	NA	NA	NA	NA	NA
Hawaiian	0	0	0	NA	NA	NA	NA	NA
Other	0	0	0	NA	NA	NA	NA	NA
MultiRace	0	0	0	NA	NA	NA	NA	NA
No Majority	1	3	2	66.67%	--	--	--	--
Total	20	183	49	26.78%	--	--	--	--
Majority Minority Tracts	12	102	35	34.31%	17.03	2.5842	0.0098	Yes
Majority Black/Hisp. Tracts	11	99	33	33.33%	16.05	2.4388	0.0147	Yes

Yellow shading identifies a row where the denial rate is higher than the denial rate in majority White tracts, and the difference is statistically significant.

Data are from the 2018 HMDA-LAR published by the FFIEC.

Purchases and applications without a census tract are excluded from the report.

*Majority Race Tracts are those where one race comprises >50% of the population. Majority Black/Hisp. tracts are those where >50% of population is either Black or Hispanic.

**Difference between the denial rate in majority White tracts and the denial rate in tracts that are not majority White (e.g. Majority Black, Majority Hispanic, Majority Minority etc.)

***Confidence level is 95%.

Subprime Lender Market Share: Cleveland Heights, 2018

Rank	Lender	Type	#	%
1	THE HUNTINGTON NATIONAL BANK (2WHM8VNIH63UN14OL754)	P	15	15.63
2	THIRD FEDERAL SAVINGS AND LOAN ASSOCIATION OF CLEV	P	11	11.46
3	CROSSCOUNTRY MORTGAGE, INC. (549300VZVN841I2ILS84)	P	8	8.33
4	FAIRWAY INDEPENDENT MORTGAGE CORPORATION	P	7	7.29
5	AMERICAN MIDWEST MORTGAGE CORPORATION	P	6	6.25
6	CITIZENS BANK, NATIONAL ASSOCIATION	P	4	4.17
7	HOME MORTGAGE ASSURED CORPORATION	P	3	3.13
7	LIBERTY HOME MORTGAGE CORPORATION (549300B2IHHSM77T5Y41)	S	3	3.13
7	LENDUS, LLC (549300QU7HWSPH011Y56)	P	3	3.13
7	OUIKEN LOANS INC. (549300FGXN1K3HLB1R50)	P	3	3.13
7	FIFTH THIRD BANK (OFROUN1UWUYU0DVIWD51)	P	3	3.13
12	CARRINGTON MORTGAGE SERVICES, LLC	P	2	2.08
12	UNION HOME MORTGAGE CORP. (549300RPOGWIRH63HS39)	P	2	2.08
12	RUOFF MORTGAGE COMPANY, INC. (549300GSCUIKIINR1980)	P	2	2.08
12	FIFTH THIRD MORTGAGE COMPANY (7TAK8VIOI0IZUCSH8R26)	P	2	2.08
12	NAVY FEDERAL CREDIT UNION (5493003GODUH26DNNH17)	P	2	2.08
17	IPMORGAN CHASE BANK, NATIONAL ASSOCIATION	P	1	1.04
17	MORIA DEVELOPMENT, INC. (549300N3IBO15RO7AV97)	P	1	1.04
17	GOLDWATER BANK, N.A. (549300X08OKYUH256I80)	P	1	1.04
17	HOMESIDE FINANCIAL, LLC (549300RN01LBYR8ZVX74)	P	1	1.04
17	PRIMELENDING, A PLAINSCAPITAL COMPANY	P	1	1.04
17	FIRST FEDERAL SAVINGS AND LOAN ASSOCIATION OF LAKE	P	1	1.04
17	BANK OF AMERICA, NATIONAL ASSOCIATION	P	1	1.04
17	GSF MORTGAGE CORPORATION (25490018IFOOT83O7H49)	P	1	1.04
17	AMERIFIRST FINANCIAL CORPORATION (54930080OKRZ7NNZIO71)	P	1	1.04
17	ROYAL UNITED MORTGAGE LLC (549300UG7OXKM7KGV847)	P	1	1.04
17	BELLWETHER ENTERPRISE REAL ESTATE CAPITAL, LLC	S	1	1.04
17	HOME POINT FINANCIAL CORPORATION (549300BRJZYHYKT4BI84)	P	1	1.04
17	NEWREZ LLC (549300FNXY540N23N64)	P	1	1.04
17	SPRING EQ. LLC (549300PIL8LFAO04XC20)	S	1	1.04
17	GOLD STAR MORTGAGE FINANCIAL GROUP, CORPORATION	P	1	1.04
17	BROKER SOLUTIONS, INC. (549300E2UX99HKDBR481)	P	1	1.04
17	FINANCE OF AMERICA MORTGAGE LLC (549300MXIA09WZJ0DV55)	P	1	1.04
17	PENNYMAC LOAN SERVICES, LLC (RVDPPPGHCGZ40I4VO731)	P	1	1.04
17	INTERCONTINENTAL CAPITAL GROUP, INC	P	1	1.04
17	LOANDEPOT.COM, LLC (549300AG64NHILB7ZP05)	P	1	1.04
	Number of Lenders = 36	Total	96	100.00

Fair Housing Center for Rights & Research is a not-for-profit agency whose mission is to protect and expand fair housing rights, eliminate housing discrimination, and promote integrated communities.

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