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**City of Troy, Ohio  
Analysis of Impediments to  
Fair Housing Choice Update  
June 2010**

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<p>With careful analysis, observation and consideration, the following items are identified as impediments to Fair Housing Choice:</p> <ol style="list-style-type: none"><li>1. Economic Opportunity</li><li>2. Transportation Issues</li><li>3. Affordability of safe, decent, housing for people within protected classes</li><li>4. Lack of available home lending products (purchase and refinance) -Predatory Lending / Possible Fraud and Foreclosure Intervention Scams / Foreclosures</li></ol>	
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## **INTRODUCTION/ METHODOLOGY**

In affirmatively furthering fair housing choice, the City of Troy has made tremendous strides forward while enduring certain set backs in light of our national foreclosure and economic crisis. It is important to note that the statistical information provided within this report is essentially outdated, with 2008-2009 being the basis. The 2010 U.S. Census, upon release, will offer more current data reflective of changes that have occurred within the community. Now, more than ever, it is critical for the City of Troy to rise to the challenges presented by this ever changing world and ensure the stability that affirmatively furthering fair housing choice provides.

Housing stability and choice is critical for citizens to meet essential basic human needs and to pursue personal, educational, employment and other goals. The City of Troy indeed takes seriously its obligation to affirmatively further fair housing with this in mind. Safe, decent and stable housing is a basic human need required by everyone regardless of protected class status; however, members of certain protected classes are documented to have more barriers in obtaining and maintaining permanent housing as illustrated in this report by the Miami County Continuum of Care Point in Time Count 2009 results. Some barriers to fair housing choice and housing stability are basically perpetuated by virtue being of protected class status. The inability to earn enough money to afford safe, decent and stable housing without any form of assistance makes relying on the availability of that assistance in various forms important to the community in its efforts to affirmatively furthering fair housing choice.

This report examines the effect of the same identified impediment(s) on separate housing status groups; homeowners, renters and homeless/at risk of homeless populations. The same impediment to fair housing choice may have a similar impact or may have a very different impact for each housing status group. Cross cutting strategies in addressing impediments to fair housing choice are provided within the recommendations of this report.

This report was prepared by an independent Fair Housing Advocate, owner of Pure Flow Fair Housing and Community Development LLC that has lived in the City of Troy of Miami County, Ohio for 20 years, and has served as a Fair Housing Advocate for jurisdictions within Miami and Darke Counties including the City of Troy for over eight years. It reflects an unbiased, accurate professional analysis tempered with the view of an actively invested citizen Pure Flow Fair Housing and Community Development, LLC is a disadvantaged woman owned business.

In formulation of this report guidance provided in the United States Department of Housing and Urban Development (HUD) Fair Housing Planning Guide-Volume I, and publications provided by the Ohio Department of Development (ODOD) Office of Housing and Community Partnerships (OHCP) including, but not limited to "Affirmatively Furthering Equal Housing Opportunity", "How to Analyze Impediments to Fair Housing Choice and Develop a Plan Guidebook" and "Affirmative Fair Housing Marketing Guide" was utilized. Additional training provided by the National Fair Housing Training Academy (NFHTA), the Ohio Community Development Corporation Rehab Series Training on "Universal Design and Visitability", "Construction Planning and Management"; along with participation in the Ohio "Save the Dream" Initiative, and the Miami Valley Regional Planning "Going Places" Initiative have also been contributing factors to this report. The core of this report however is based in serving and participating in dedicated community enhancing groups and forums most notably, the Miami County Continuum of Care.

## WHAT IS AN IMPEDIMENT TO FAIR HOUSING CHOICE?

Per the United States Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity, an impediment to fair housing choice is defined as the following:

“An impediment to fair housing choice is a barrier or hindering factor that exists due to actions, omissions or decisions: public or private, that have the effect of limiting or diminishing equal access, availability and treatment concerning residential housing for people of protected classes.”

Impediments to fair housing choice are interpreted differently in each jurisdiction. Common national, state, regional and local housing themes also exist. The Federal Fair Housing Act is codified at 42 USC Sections 3601 – 3619, and for the State of Ohio in Chapter 4112 of the Ohio Revised Code. The following are **protected classes** under each codification:

**Familial Status:** - Including children under the age of 18 living with parents or legal custodians; pregnant women and people in process of securing custody of children under the age of 18.

**Disability Status:** An individual person or a household that includes a person with a mental or physical impairment, disability or handicap.

**Race:** Refers to an ethnic group with which a person identifies.

**Color:** Refers to skin tone.

**National Origin / Ancestry:** Refers to an individual's heritage or lineage.

**Religion:** Refers to an individual's spiritual affiliation or attitude.

**Sex or gender:** This status refers to the human biological classification; male or female.

**\*\*\*New for Ohio only- Military Status-** including regular active duty service members and reservists or National Guard members who have been activated for service or who must report for training. (Ohio Sub. H.B. 372- the “Ohio Veterans Package)

The Fair Housing Act covers most housing. In some circumstances, the Act exempts owner-occupied buildings with no more than four units, single-family housing sold or rented without the use of a broker, and housing operated by organizations and private clubs that limit occupancy to members.

**PROVISION OF LOCAL CONTACT /COMPLAINT INTAKE PROCESS –**  
**COMPLAINT STATUS – DESCRIPTION**

Per the Ohio Department of Development Office of Housing and Community Partnerships Civil Rights Division, the City of Troy is required to provide a Fair Housing contact person who is “expected to either have the expertise to handle phone/walk-in inquiries or to efficiently refer inquires to the person/agency who does have the expertise”.

The jurisdiction is to: 1) Establish a published contact phone number and include it on printed educational outreach material, 2) Designate an employee who is available Monday through Friday during normal business hours to handle phone or walk-in inquiries, 3) Establish a system to record the nature of calls, the action taken, and the result of action taken.

The City of Troy contracts with the Miami County Economic and Community Development Department for this service. A log of calls concerning potential fair housing complaints and nature of calls has not been provided to the City of Troy since FY07. **This Fair Housing Advocate strongly recommends that a detailed call log with nature of calls and recommendations / referrals documented to be provided at minimum annually as it is a mandated record keeping requirement for the City of Troy to maintain.**

In FY’09 no fair housing complaint filings were made in the City of Troy.

In FY ’08, one fair housing complaint was filed on 7/31/08 by a resident in Miami County; unknown further on the jurisdiction; based on disability and was closed via FHAP judicial review.

In FY’07 no fair housing filings were made throughout Miami County.

In FY’06, two complaints were filed. The first was filed on 2/2/07 concerning discrimination in terms/ conditions/privileges relating to rental and coercion based on race, color, disability and familial status and was successfully settled/conciliated and closed on 6/30/07. It was filed by a Miami County resident, believed not to be a City of Troy resident.

The remaining case was filed by a City of Troy resident living in the Terrace Ridge Apartment Complex managed by Sterns Hindy on 2/23/07 with the assistance of this Fair Housing Advocate based on non compliance of design and construction requirements and disability status. The Complainant had previously used the Ohio Civil Rights Commission (approximately 3 years prior) to conciliate a reasonable accommodation to occur via the property management company moving the complainant to the first available wheelchair accessible unit due to his deteriorating health. For three years, units would become available and he would be refused said units for various reasons. The complainant soon needed permanent use of a wheel chair for mobility. Due to his condition as well as medications, the operation of guiding the wheelchair through doorways required impossible precision at times. Less than a half an inch on either side of doorways to a bedroom and a bathroom had to be negotiated by the complainant to use the afore described rooms. The complainant’s quality of life was severely diminished.

The Ohio Civil Rights Commission offered the same conciliation terms “first available unit”. The U.S. Department of Housing and Urban Development asked for this Fair Housing Advocate and the complainant’s case manager from Riverside to “advocate” on his behalf. The complainant died within six months of filing the 2/ 23/07 complaint; three years after he filed his first complaint concerning the issue.

### **CITY OF TROY, OHIO- DATA**

**(Based on the U.S. Census American Communities Survey 2006 – 2008 Data Set, U.S. Department of Housing and Urban Development (HUD) FY2009 Data, The National Low Income Coalition 2009 Data and Policy Matters, Ohio 1995 - 2009 Data)**

**POPULATION** OF TROY CITY SCHOOL DISTRICT: From 2005-2007, TROY CITY SCHOOL DISTRICT had a total population of approximately 30,000 people

Population characteristics are as follows; 50.1% are females and 49.9% are males. The median age was 37.6 years. 24% of the population was under 18 years and 12 % was 65 years and older.

**DISABILITY**: In TROY CITY SCHOOL DISTRICT, among people at least five years old from 2005-2007, 13 percent reported a disability. The likelihood of having a disability varied by age - from 5 percent of people 5 to 15 years old, to 11 percent of people 16 to 64 years old, and to 35 percent of those 65 and older.

**HOUSEHOLDS AND FAMILIES**: From 2005-2007 there were 12,000 households in TROY CITY SCHOOL DISTRICT. The average household size was 2.5 people.

Families made up 67 percent of the households in TROY CITY SCHOOL DISTRICT. This figure includes both married-couple families (52 percent) and other families (15 percent). Nonfamily households made up 33 percent of all households in TROY CITY SCHOOL DISTRICT. Most of the nonfamily households were people living alone, but some were composed of people living in households in which no one was related to the householder.

**RACE** -For people reporting one race alone, 94 percent was White; 4 percent was Black or African American; less than 0.5 percent was American Indian and Alaska Native; 2 percent was Asian; less than 0.5 percent was Native Hawaiian and Other Pacific Islander, and less than 0.5 percent was some other race. Two percent reported two or more races. One percent of the people in TROY CITY SCHOOL DISTRICT were Hispanic. Ninety-two percent of the people in TROY CITY SCHOOL DISTRICT were White non-Hispanic. People of Hispanic origin may be of any race

**RELIGION** -The U.S. Census 2000 did not tabulate religious affiliation or preference, however, through observation and confirmed by local telephone directories and other means, it is concluded that an active and diverse religious base thrives in the City of Troy without conflict.

**NATIONAL ORIGIN** - National origin was not tabulated for the ACS Survey. According to the U.S. Census 2000; a total of 91,880 Miami County Citizens identified a specific ancestry about themselves for the 2000 Census. The largest groups were; "American", "German", "Irish" and "English".

### **CITY OF TROY, OHIO- DATA**

**(Based on the U.S. Census American Communities Survey 2006 – 2008 Data Set, U.S. Department of Housing and Urban Development (HUD) FY2009 Data, The National Low Income Coalition 2009 Data and Policy Matters, Ohio 1995 - 2009 Data)**

**HOUSING CHARACTERISTICS:** From 2005-2007, TROY CITY SCHOOL DISTRICT had a total of 12,946 housing units, 440 of which were vacant. Of the total housing units, approximately 75 percent were single-unit structures, 24 percent were multi-unit structures, and 1 percent was mobile homes.

The City of Troy has a homeownership rate of 57.4%; the national average is 67.1%.

The City of Troy has a rental occupancy rate of 42.6%; the national average is 32.9%.

Twenty-five percent (25%) of the housing units in the City of Troy were built since 1990.

About 6302 units, almost 50% were built prior to 1970 indicating a possibility of lead paint. Generally in housing at or prior to the age of thirty years, major housing systems such as roofs, heating / cooling systems, electric, windows, etc. need to be replaced making the affordability of safe decent sanitary housing even less likely for low to moderate income owners and renters.

### **HOUSING AFFORDABILITY**

**HUD defines housing “affordability” as paying out only 30% of ones gross income on housing expenses including utilities.**

According to the National Low Income Coalition Report, “Out of Reach 2010”, in Miami County / the City of Troy, the Fair Market Rent (FMR) for a two-bedroom apartment is \$696. In order to afford this level of rent and utilities, without paying more than 30% of income on housing, a household must earn \$2,320 monthly or \$27,840 annually. Assuming a 40-hour work week, 52 weeks per year, and this level of income translates into a Housing Wage of \$13.38.

In Miami County/ the City of Troy, a minimum wage worker earns an hourly wage of \$7.30. In order to afford the FMR for a two-bedroom apartment, a minimum wage earner must work 73 hours per week, 52 weeks per year. Or, a household must include 1.8 minimum wage earner(s) working 40 hours per week year-round in order to make the two bedroom FMR affordable.

In Miami County / the City of Troy, the estimated mean (average) wage for a renter is \$10.77 an hour. In order to afford the FMR for a two-bedroom apartment at this wage, a renter must work 50 hours per week, 52 weeks per year. Or, working 40 hours per week year-round, a household must include 1.2 worker(s) earning the mean renter wage in order to make the two-bedroom FMR affordable.

### **CITY OF TROY, OHIO- DATA**

**(Based on the U.S. Census American Communities Survey 2006 – 2008 Data Set, U.S. Department of Housing and Urban Development (HUD) FY2009 Data, The National Low Income Coalition 2009 Data and Policy Matters, Ohio 1995 - 2009 Data)**

**INCOME**: The median income of households in TROY CITY SCHOOL DISTRICT was \$46,963. Eighty-one percent of the households received earnings and 19 percent received retirement income other than Social Security. Twenty-four percent of the households received Social Security. The average income from Social Security was \$14,623. These income sources are not mutually exclusive; that is, some households received income from more than one source.

- Median income for a full time year round male worker is \$41,894
- Median income for a full time year round female worker is \$32,673 (22% lower than males)

The “Median Income” scale does not reflect disparity in household incomes that exist in the City of Troy regarding members of protected classes. It is important to note the significant presence of poverty provided below.

**POVERTY AND PARTICIPATION IN GOVERNMENT PROGRAMS**: From 2005-2007, in the City of Troy, 11% of all families had incomes below the poverty level and 14 % of all households were in living in poverty. Of all children under the age of 18; 21% of were below the poverty level, and of people 65 years old and over; 7% lived below the poverty level. In families with a female householder and no husband present, 36% had incomes below the poverty level.

**EDUCATION**: From 2005-2007, 86 percent of people 25 years and over had at least graduated from high school and 22 percent had a bachelor's degree or higher. Fourteen percent were dropouts; they were not enrolled in school and had not graduated from high school.

The total school enrollment in Troy City Schools was 6,300 from 2005-2007. Nursery school and kindergarten enrollment was 990 and elementary to high school enrollment was 4,100 children. College or graduate school enrollment was 1,100 not including all adults seeking further education.

**INDUSTRIES**: From 2005-2007, for the employed population 16 years and older, the leading industries in Troy city were Manufacturing, 32 percent, followed by Educational Services, Health Care, and Social Assistance Providers.



**IDENTIFICATION OF NEW IMPEDIMENTS TO FAIR HOUSING CHOICE FY10**  
**(24CFR904(c) standard)**

As indicated by the Ohio Department of Development Office of Housing and Community Partnerships; the relationship between the housing market, credit and employment needs has had a significant effect on fair housing choice in the City of Troy, in Ohio as well as our nation.

With careful analysis, observation and consideration, the following items are identified as the new Impediments to Fair Housing Choice suggested to be addressed in FY2010- FY2012:

- 1. Economic Opportunity**
- 2. Transportation Issues**
- 3. Affordability of safe, decent, housing for people within protected classes**
- 4. Lack of home lending products (purchase and refinance) Predatory Lending / Fraud & Foreclosure Intervention Scams / Foreclosures**

The sections following will provide detailed analysis and sources of information on which these impediments were identified as well as some professional recommendations to consider in addressing the impediments.

**IDENTIFICATION OF NEW IMPEDIMENTS TO FAIR HOUSING CHOICE FY10**  
**(24CFR904(c) standard)**

**ECONOMIC OPPORTUNITY**

The national downturn in the economy has hit Ohio, Miami County and the City of Troy hard. Below is a chart indicating just how difficult the current local unemployment situation has become over the past few years.

MONTH /YEAR	UNEMPLOYMENT RATE	NUMBER OF PEOPLE UNEMPLOYED
May 2008	5.6%	3000
May 2009	11.6%	6400
April 2010	11.5%	6330

Source: Ohio Labor Market Information; Labor Force Estimates –Miami County, Ohio

Basically, the bottom line is that it is impossible to obtain, sustain or maintain homeownership or rental housing without adequate earned income; effecting fair housing choice.

For subsidized housing assistance in the case of rental property; there is an approximate three year wait for Section 8 private rental program assistance making it virtually impossible for individuals and / or families who have experienced recent or sudden loss of income to sustain housing. Public housing and tax credit housing opportunities are somewhat limited, but are more readily available than Section 8. This contributes to the phenomenon occurring currently where many of these individuals and families live “doubled up” with friends or other family members for an extended period of time; some even become homeless.

For people with additional barriers including, but not limited to, limited education, limited or blemished work history, disabilities or lack of marketable skills, many of whom fall into one or more protected class statuses; traditional employment is not available at this time.

The City of Troy robustly addresses this issue in a variety of ways. Please read below for suggested action steps.

**IMPEDIMENT # 1 -Economic Opportunity**

• **SUGGESTED / CURRENT ACTION STEPS**

The City of Troy has had much success in expanding both domestic and international industry even in these tough economic times. The City of Troy Economic Development Department, Troy City Council and the Troy Development Council are committed to providing continuous attention and development of opportunities for residents of Troy to be able to maintain gainful employment required to support housing stability.

Recent expansions that the City has directly assisted in making feasible is the reuse of an industrial site to become the new Clopay Building Products Manufacturing Facility and improvements assisting ConAgra to grow. Many other endeavors have successful as ell.

Troy City Schools offer a Post Secondary Educational Opportunity Program (PSEOP). Troy High School Students who apply for and meet a basic set standard for participation are offered a unique opportunity to attend a local community college to earn both high school and college credit. This is one great example of how the City is ensuring economic stability and opportunity for future generations and should be continued.

The City of Troy will no doubt continue all efforts to regain and increase economic opportunities for citizens of the City of Troy. Additionally, it is recommended that the City consider some or all of the following recommendations.

The City has additional potential to explore new ways to offer nontraditional employment and empower nonprofit and governmental organizations to offer skills training or certifications in potential employment growth areas. Concentrating these efforts for members of Fair Housing Act Protected Classes would accomplish expanding fair housing choice and would serve to affirmatively further fair housing.

Ideas under consideration by the Miami County Continuum of Care to bridge gaps in available jobs and training currently include; assisting low to moderate income persons, especially those who fit the Section 3 description, get training and/or certifications to work in the housing rehabilitation industry (Lead Renovation Certification, Visitability, Energy Efficiency). Additionally, spearheading and coordinating a variety of low skill small business services such as yard and home maintenance, cleaning and companion care, gap transportation or other services that may serve as a transitional employment program for persons who are at risk of homelessness or are homeless is a serious consideration the Miami County CoC may undertake with the right backing.

The availability of approximately three acres of farmland located directly outside of the City of Troy may be donated to the Family Abuse Shelter and / or the Miami County Continuum of Care. If the organization(s) can show interest and specific capacity, a community farming project that has several purposes may be established. Local, fresh, organically grown fruits and vegetables could be offered for sale as well as provide for nutrition at local soup kitchens and/or food pantries while providing work and skills to people in need of work. Those who have barriers and cannot compete for traditional employment in the current job market may be protected class members.

In addition to continuing all traditional efforts to ensure economic stability and improvement, it is the recommendation that the City consider supporting the Miami County Continuum of Care in a variety of ways to ensure the aforescribed ideas for training and non traditional employment may come to fruition for the City of Troy and Miami County.

**IDENTIFICATION OF NEW IMPEDIMENTS TO FAIR HOUSING CHOICE FY10**  
**(24CFR904(c) standard)**

**TRANSPORTATION ISSUES**

Ohio ranks 40th in the nation for relative commitment to public transit, despite being the nation's seventh most populous state. Indiana spends three times more than Ohio, and Pennsylvania spends 33 times as much. Funding for Transportation is not just a local issue; it is an issue on the state level. Lack of adequate, affordable transportation affects an individual's ability to maintain gainful employment which may result in limiting fair housing choice.

It is well established that proximity to employment is important to people with modest incomes, especially for those at or near poverty level. Generally, in the City of Troy, the East Side provides the majority of affordable housing opportunities, while the West Side provides most of the employment opportunities.

Consistently for several years; social service providers have voiced through the Miami County Continuum of Care that Miami County / the City of Troy does not have an adequate system of public transportation that is affordable and practical for actual use particularly for people who need to rely on the transit system to maintain employment. The Miami County Continuum of Care has documented that lack of reliable transportation is a direct contributing factor to the instances of homelessness in this jurisdiction. Lack of affordable and reliable transportation is a barrier in obtaining and maintaining employment in numerous cases.

Consumers in the City of Troy / Miami County complain about the reliability, cost and feasibility of use concerning the public transit system offered in Miami County / City of Troy. An hour "window" for a pick up or drop off is commonly required for use. It is an expensive system to utilize on a daily basis especially when an extra stop or charge to a daycare or other facility is factored in.

The cost to utilize the Miami County Public Transit Service is \$4.00 per person. A stop at a daycare facility constitutes one "ride" and riders are charged for an additional "ride" to the next leg of their journey; effectually, a single parent may need to pay \$8.00 each way or \$16.00 per day to just get to back and forth to work. Transportation vouchers are offered for those who are eligible, but many times restrict the number of cost free rides available for use in a given month.

It is important to reiterate that this is not just a problem in this jurisdiction. Despite the need for public transportation, Ohio transit agencies have been forced to slash transit services and to raise fares. The State of Ohio has cut funding by 75 percent since 2002; less than one percent of ODOT's budget is spent on public transit. The State of Ohio will spend more to cut the grass along its Interstates than for public transit operations in 2010.

## **IMPEDIMENT # 2 -Transportation Issues**

- **SUGGESTED / CURRENT ACTION STEPS**

This issue is extremely difficult to address within the current transit systems funding restraints. Numerous non-profit groups within Miami County and the City of Troy continuously address this issue on a case by case basis.

The correlation of how housing choice is affected for people who do not have independent self sufficient transportation is important to acknowledge. Limiting people to only live where groceries, banks, and other goods and services can be accessed by foot or by bike is a naturally occurring result without an adequate public or even private transit system in place. Many people who do not have independent self sufficient transportation in the City of Troy are members of one or more protected classes. This issue will need to be addressed on a comprehensive planning level including the participation of the nonprofit community and / or the Miami County Continuum of Care Coalition.

**IDENTIFICATION OF NEW IMPEDIMENTS TO FAIR HOUSING CHOICE FY10  
(24CFR904(c) standard)**

**AFFORDABILITY OF SAFE, DECENT FOR PEOPLE WITHIN  
PROTECTED CLASSES**

Each of the following groups is impacted differently concerning this same impediment, as described herein.

**PEOPLE AT RISK OF HOMELESSNESS OR HOMELESS**

On June 18, 2010 HUD released the corrected 2009 Annual Homeless Assessment Report to Congress, a national study that explores changes in the extent and nature of homelessness nationwide. According to the 2009 Annual Homeless Assessment Report to Congress prepared by the U.S. Department of Housing and Urban Development, the problem of “doubling up” increased fivefold in 2009 alone. HUD studies document that in overcrowded living conditions, children don’t do as well in school and families lack privacy, which can lead to greater stress, health and safety problems.

This phenomenon of “doubling up” is documented as becoming increasingly prevalent in the City of Troy and Miami County through the Miami County Continuum of Care Homeless Prevention and Rapid Rehousing Program (HPRP) administered by the Family Abuse Shelter of Miami County, as well as through consistent accounts of virtually all nonprofit social service providers participating in the Miami County Continuum of Care.

“Doubling up” was defined by the National Association to End Homelessness and has been a term used by HUD in numerous brief and reports including the most recent released in June 2010; the 2009 Annual Homeless Assessment Report to Congress. “Doubling up” is defined as an individual or family living in a housing unit with extended family, friends, and other non-relatives due to economic hardship, earning no more than 125 percent of the federal poverty level.

While not all people who are doubled up become homeless, for many individuals and families this event serves as a precursor. According to the 2008 Annual Homeless Assessment Report to Congress (AHAR), approximately 46 percent of people who were not homeless before accessing shelter services spent the previous night at the home of a friend or family member.

According to data provided by the National Association to End Homelessness, it can take a year or more before a troubled family or individual “wears out their welcome” and exhausts all other avenues before they become homeless. With a three year (3year) wait for subsidized Section 8 Rental Assistance in Miami County / the City of Troy, the problem of homelessness will likely worsen until the economy bounces back.

In 2009, the Homeless Assistance and Rapid Transition to Housing (HEARTH) Act expanded the definition of homelessness to include some “doubled up” families, making them eligible for homeless assistance services. This was very significant for our jurisdiction as many more people here are “transitionally homeless”; homeless temporarily due to economic set backs rather than “chronically homeless”.

The following is demographic information further describing who are homeless in Miami County City of Troy from the Miami County Continuum of Care “Point In Time Survey 2010”:

**HOMELESS Point in Time Study January 2010 – Miami County / City of Troy**  
**Persons in Emergency Shelter and Transitional Housing**

Males Average Age	39
Females Average Age	33
Children Average Age	4
Average times being Homeless	2
Average length of Homeless stay in Emergency Shelter	46 days
Number of Families with Children	4
Number of People in families with children	12

**“AT RISK OF HOMELESSNESS” DEMOGRAPHICS – MIAMI COUNTY PIT 2010**

- 12 % of Households reported having no income at all
- 42 % of Households reported Social Security as a source of income
- 47% of Households reported a family member with mental health issues
- 58% of adults reported physical disabilities
- 54% of Adults reported experiencing Domestic Violence within the past two years
- 32% of children were reported to have disabilities – primarily developmental in nature

**TRANSITIONAL HOUSING PROVIDERS – City of Troy, Miami County**

- FAS of Miami County
- Community Housing Inc. via the Tri County Board of Recovery and Mental Health
- Miami County Recovery Council
- St. Josephs House

## **SUMMARY OF FINDINGS – MIAMI COUNTY PIT COUNT 2010**

- Female Headed Families are at the highest risk of becoming homeless
- Job Loss cited as the main reason causing homelessness (63%)
- Substance Abuse, Physical Disabilities, and Health Concerns are identified as the highest risk factors
- Men are more likely to report substance abuse and physical disabilities or health concerns as a cause for their current homeless situation
- Average age of Homeless Adult Male and Females Increasing; 39 males, 33 females
- Average age of Homeless Children is Decreasing: 4 years of age
- Number of At Risk Children reported to have disabilities increasing
- Average length of time in emergency shelter before moving to transitional housing or housing that is expected to be permanent is decreasing; 2006 = 100 days, 2010 = 61 days

As illustrated within the above demographic information provided by the Miami County Continuum of Care Homeless / At Risk of Homelessness Point In Time Count 2010, distinct groups of fair housing protected class members are documented to be the most vulnerable or at risk of homelessness.



**IDENTIFICATION OF NEW IMPEDIMENTS TO FAIR HOUSING CHOICE FY10  
(24CFR904(c) standard)**

**AFFORDABILITY OF SAFE, DECENT AFFORDABLE HOUSING FOR PEOPLE  
WITHIN PROTECTED CLASSES**

**RENTERS**

The Miami Metropolitan Housing Authority as well as Homeless Assistance Providers within the Miami County Continuum of Care has noted a surprising trend that is occurring regarding the availability of rental housing; decent rental properties are becoming more readily available and better units are in some cases actually becoming more affordable.

Part of this phenomenon may be attributed to the increasing instances of individuals and families living “doubled up” as fully described on page number 12 of this report. There is a wait of approximately three years for rental subsidy assistance for City of Troy Residents through the Miami County Metropolitan Housing Authority’s Section 8 Rental Assistance Program which subsidizes rents for units on the open market making “doubling up” the most viable solution to gain shelter in the event of job or income loss.

The American Communities Survey (2006 – 2008), provides that 42.5% of Renters in the City of Troy are “cost burdened” by HUD’s definition; paying out 30% or more of their monthly income in housing costs. This figure does not reflect the current downturn in economy, which no doubt makes the actual current number of City of Troy Renter Residents who are cost burdened even higher.

According to the National Low Income Coalition Report, “Out of Reach 2010”, in Miami County / the City of Troy, the Fair Market Rent (FMR) for a two-bedroom apartment is \$696. In order to afford this level of rent and utilities, without paying more than 30% of income on housing, a household must earn \$2,320 monthly or \$27,840 annually. Assuming a 40-hour work week, 52 weeks per year, and this level of income translates into a Housing Wage of \$13.38.

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In Miami County / the City of Troy, the estimated mean (average) wage for a renter is \$10.77 an hour. In order to afford the FMR for a two-bedroom apartment at this wage, a renter must work 50 hours per week, 52 weeks per year. Or, working 40 hours per week year-round, a household must include 1.2 worker(s) earning the mean renter wage in order to make the two-bedroom FMR affordable.

## **AFFORDABILITY OF SAFE, DECENT AFFORDABLE HOUSING FOR PEOPLE WITHIN PROTECTED CLASSES**

### **PROSPECTIVE AND CURRENT HOMEOWNERS**

The Ohio Housing Finance Agency (OHFA) in assisting in the design of the NSP 2 program and application noted that the depressed housing market, stricter credit standards, and unemployment statewide are particularly problematic in rural areas. OHFA identifies specific issues to include:

- 1) Lack of readily accessible lenders; especially those that offer products such as FHA or Rural Development Loans for low to moderate income customers
- 2) Decreased emphasis on the Community Reinvestment Act
- 3) A general perception on the part of lenders that rural lending carries increased risk
- 4) Disproportionate impact of employment reductions, with fewer job options if main major employers reduce hours, layoff workers or shut down.

The Ohio Department of Development Resident Revitalization Division additionally indicated increased difficulty in finding credit worthy clients for CHIP homeownership programs statewide for the past 3 years.

Current homeowners are affected especially hard if they are in adjustable rate mortgages, and have experienced any loss or reduction in income. With home values as much as 40% lower than in 2008; many do not have sufficient equity to refinance in this tight lending environment and are at risk of foreclosure.

At a time when mortgage interest rates are incredibly low, and home prices significantly lower than two years ago; this should be a perfect time to increase fair housing choice and increase homeownership of members of protected classes. However, the current lending climate requiring consumers to put 10% to 20% down on properties that many times need some degree of rehabilitation, makes this virtually impossible.

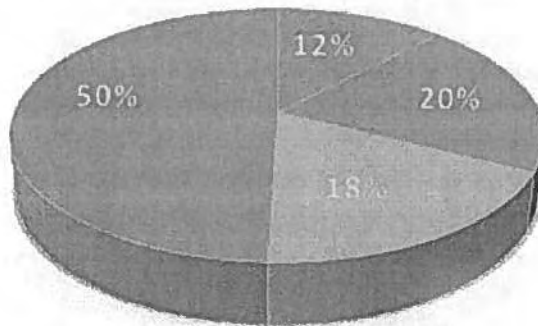
A recent report and survey published in June 2010 by a research economist for the National Association of Realtors indicates that 49% of consumers say they would never be able to save for a 20% down payment on a home.

## **PROSPECTIVE AND CURRENT HOMEOWNERS**

Below is a graph summarizing results of the National Association of Realtors 2010 Survey:

### **If I were to buy a home today, I would...**

- Have no trouble coming up with a 20 percent down-payment
- Need a loan that allowed a much lower down-payment
- Have to borrow the down-payment money regardless of how much is required
- Never be able to save enough money for a down-payment



The graph represents the poll results from the National Foundation for Credit Counseling (NFCC). The poll asked consumers about ability to meet the down-payment requirements associated with buying a home in today's market.

Of the more than 2,000 respondents, almost half (49 percent) believed they would never be able to save enough money for a down-payment on a home. Others responding to the survey indicated that their mortgage loan would either have to require a much lower down-payment (20 percent), or they would have to borrow the down-payment regardless of how much it was (18 percent). The lowest number of respondents indicated that they'd have no trouble coming up with a 20 percent down-payment (12 percent).

**IDENTIFICATION OF NEW IMPEDIMENTS TO FAIR HOUSING CHOICE FY10**  
**(24CFR904(c) standard)**

**IMPEDIMENT # 2 - Affordability of safe, decent, housing for people within protected classes**

- **ACTION STEP #1 – Promote the Home Weatherization Assistance Program (HWAP) and other Energy Conservation Efforts**

**\*\*\*HUD defines housing “affordability” as paying out only 30% of ones gross income on housing expenses including utilities.**

This action step may be immediately applied. One of the most effective ways to promote this program immediately for City of Troy Residents would be to design a simple flyer with the program description and guidelines as listed below and cost effectively mail out the flyers with every City of Troy Water / Sewer Billing periodically.

Miami County CAC operates the Ohio Home Weatherization Assistance Program (HWAP) serving City of Troy Residents. HWAP is a no-cost energy assistance program designed to increase the energy efficiency of dwellings owned or occupied by income-eligible Ohioans, reduce participants’ household energy expenditures and improve participants’ health and safety.

The program benefits Tenants, Landlords, and Homeowners and is immediately available for those who qualify. A wait time for actual selection and project completion will vary depending on the applicants “points” assigned to the application and workload pace factors. Renters and Homeowners may apply and receive assistance based on the following eligibility factors and income at or below 200% of the federal poverty guidelines listed below:

**HWAP Guidelines:**

- All families who have received assistance any time during the last 12 months under the Supplemental Security Income (SSI) or Home Energy Assistance (HEAP) (does not include Emergency HEAP) are automatically eligible for weatherization services.
- Households who do not live in federally subsidized housing and do not supply their own primary heat source (i.e., owns a gas well or cuts its own wood) will generally be eligible for services if they meet the U.S. Department of Health and Human Services income guidelines listed below:

<b>Size of Family</b>	<b>Poverty Guideline</b>
1	\$21,660
2	\$29,140
3	\$36,620
4	\$44,100
5	\$51,580
6	\$59,060
7	\$66,540
8	\$74,020

For households with more than eight (8) members, add \$7,480 for each additional member.

**How HWAP works in rental scenarios; landlord and tenant advantages and disadvantages;**

- Before the full intake process is started; the tenant or landlord can call Miami County CAC and speak with a HWAP Intake Specialist to find out if the unit has been previously weatherized by the agency. If it has in previous years it may be ineligible.
- A tenant can apply for and be eligible for assistance again later at any residence they move to in the future weather it is to a different rental unit or to their own home.
- The tenant will need to gather significant documentation on each resident of the unit including, but not limited to proof of all income, social security cards, birth certificates and more and make an appointment. Miami County Community Action Council is open 8:00 am to 4:30p.m. Monday through Friday, and the appointment would be scheduled during those hours.
- The landlord will be required to return the rental verification forms, and sign off or allow the scope of work to be done to the unit as specified after eligibility is determined. If the unit has a furnace that is 85% or less efficient; the landlord will be offered a high efficiency replacement furnace complete with installation at half of the price of the cost of the unit and labor, but has the ability to decline.
- HWAP improvements include free insulation, caulking, weather-stripping, replacing furnaces that are not energy efficient and possibly other items.
- The tenant will have to deal with the construction / repair inconvenience element; but will save substantially on energy bills making the housing more affordable to retain
- The landlord benefits with the value of improvements of the units and may benefit by the tenants ability to be able to better afford paying rent as well as utility bills during winter months and year round.

**How HWAP works in homeownership scenarios;**

- The same income guidelines and application process applies to homeowners as listed above for renters.
- If the unit has a furnace is 85% or less efficient the FURNACE WILL BE REPLACED FOR FREE!!!!!!
- HWAP improvements include free insulation, caulking, weather-stripping, replacing furnaces that are not energy efficient and possibly other items.
- The homeowner reaps the value of improvements / equity made absolutely for free; there is no repayment for this service.

**IMPEDIMENT # 2 - Affordability of safe, decent, housing for people within protected classes (continued)**

- **ACTION STEP #2 – Promote Homeless Prevention and Assistance Programs – Increase rental subsidy assistance programs**

As illustrated within demographic information provided earlier produced by the Miami County Continuum of Care Homeless / At Risk of Homelessness Point In Time Count 2010,

distinct groups of fair housing protected class members are documented to be the most vulnerable or at risk of homelessness.

It is imperative to support efforts of current transitional housing providers and the Miami County Continuum of Care and Homeless Prevention and Assistance Programs therein to affirmatively further fair housing choice and stability for members of protected classes.

The inventory of better quality, safe and decent rental units is becoming more and more available in the private rental market per the Miami Metropolitan Housing Authority, Miami County Continuum of Care and local realtors. As a better selection of rental property has become available due to a variety of reasons including but not limited to residents “doubling up” as described in more detail in the section of this report addressing homelessness and homeless risk, individuals and families may have enhanced fair housing choice if granted subsidized assistance.

There is a wait of approximately three years for rental subsidy assistance for City of Troy Residents through the Miami County Metropolitan Housing Authority’s Section 8 Rental Assistance Program which subsidizes rents for units on the open market. Rental subsidy programs such as the Section 8 Rental Assistance Program provided by the Miami County Metropolitan Housing Authority that serves the general population, and transitional housing providers including but not limited to the Family Abuse Shelter of Miami County and Community Housing Inc., that serves the severely mental disabled population are in dire need of additional housing vouchers and / or tenant based rental assistance dollars to meet the needs of current Troy Citizens who are experiencing housing cost burden and are homeless or at risk of becoming homeless.

An additional factor to consider is a landlord’s ability or inability to properly maintain rental property units if they are not generating rental income. With a housing base consisting of 42.6% in rental properties; a landlord’s inability to cover mortgage payments equates to a deterioration of properties, a decline in surrounding property values, and overall deterioration of the Troy Community as well as increased potential for foreclosure.

One possible remedy may be to apply for Community Housing Improvement Program (CHIP) dollars to in part fund tenant based rental assistance (TBRA) activities that could assist in meeting the immediate need for rental subsidy assistance for residents of the City of Troy. When the economy bounces back, this activity may not be as crucial; but it is very crucial at this point in time.

**IMPEDIMENT # 2 - Affordability of safe, decent, housing for people within protected classes (continued)**

- **ACTION STEP #3 – Support the development of home renovation and home purchase assistance / renovation programs**

A significant cost of homeownership which is optional to an extent is home maintenance and repair costs. In order for many Troy Residents who are current homeowners to maintain housing, assistance may be needed to pay for repairs that affect the health and safety of residents.

According to the American Communities Survey (2006 – 2008), 25.2% of Homeowners with mortgages in the City of Troy and 9.9% of Homeowners without mortgages in the City of Troy were “cost burdened” by HUD’s definition; paying out 30% or more of their monthly income in housing costs. These figures denote that between 2006-2008, 35.1% of the total numbers of Troy Homeowners were cost burdened. This figure does not reflect the current downturn in economy, which no doubt makes the actual current number of City of Troy Homeowner Residents who are cost burdened even higher.

For many years, Miami County included City of Troy Residents in its CHIP Home Repair Program, making repair grants up to \$8,000 available to low to moderate income eligible citizens. However, the County no longer serves the jurisdiction of the City of Troy in this capacity. It is in the best interest of the City of Troy to apply for and operate its own CHIP Home Repair Program to assist in the provision of maintaining affordable, safe housing for low to moderate income residents, many of whom are members of protected classes that have achieved home ownership.

The Ohio Housing Finance Agency (OHFA) in assisting in the design of the NSP 2 program and application noted that the depressed housing market, stricter credit standards, and unemployment statewide are particularly problematic in rural areas making homeownership opportunities limited.

OHFA identifies specific issues to include:

- 1) Lack of readily accessible lenders; especially those that offer products such as FHA or Rural Development Loans for low to moderate income customers
- 2) Decreased emphasis on the Community Reinvestment Act
- 3) A general perception on the part of lenders that rural lending carries increased risk

The Ohio Department of Development Resident Revitalization Division additionally indicates increased difficulty in finding credit worthy clients for CHIP homeownership programs statewide for the past 3 years.

Garnering agreements and assistance from the banking / mortgage lending industries that operate in the City of Troy/ Miami County to establish financing mechanisms as well as providing a first time homeownership education program including credit counseling may serve to increase fair housing choice for low to moderate income residents who are members of protected classes.

With the availability of foreclosed properties at an average of 43% below market value (Realty Track 2010) in this region of Ohio, it is more feasible than ever to purchase, rehab and resell properties to moderate to low income families in the City of Troy; changing the dynamic of an over abundance of rental properties in core areas to an increased homeownership rate that increases housing stability and housing choice for members of Fair Housing Act Protected Classes.

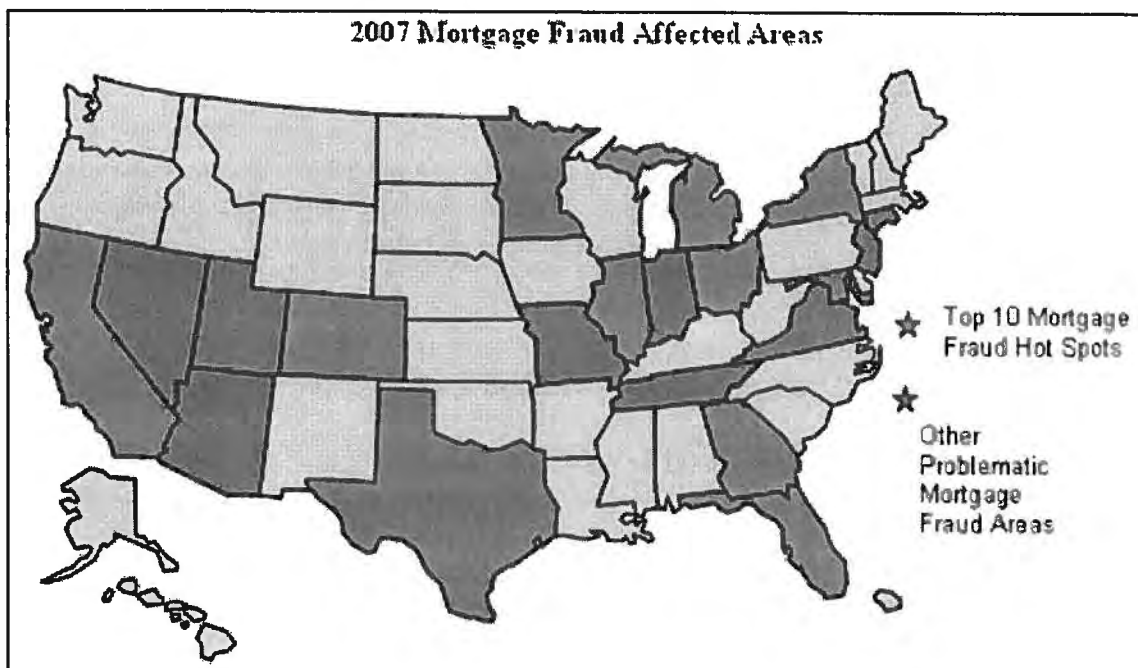
**IDENTIFICATION OF NEW IMPEDIMENTS TO FAIR HOUSING CHOICE FY10**  
**(24CFR904(c) standard)**

**LACK OF HOME LENDING PRODUCTS PURCHASE AND REFINANCE (Purchase and Refinance) -PREDATORY LENDING / FRAUD and FORECLOSURE INTERVENTION SCAMS/ FORECLOSURES**

The National Fair Housing Alliance 2010 Fair Housing Trends Report cites that there is “a plethora of evidence regarding discriminatory practices of lenders, appraisers and mortgage insurance companies”. It is simply against the law right now to fully systematically “test” the mortgage lending process to provide best documented evidence to prosecute.

In early June of 2010, the Ohio Supreme Court held its first Mortgage Fraud Summit at the Ohio Judicial Center. Supreme Court of Ohio Justice Maureen O'Connor described Ohio's ongoing foreclosure problem as well as the Supreme Court's efforts to assist homeowners: working with courts to start foreclosure mediation programs, urging attorneys to work for free when appropriate in foreclosure cases, and collecting, analyzing and reporting foreclosure statistics to inform the public policy debate. Justice O'Connor predicted that the collaborative nature of the Ohio Supreme Court's effort would find success just as Ohio's multi-agency foreclosure prevention effort – the Save the Dream Program – has proven to be effective in directing people to numerous state resources and programs related to foreclosure. Justice O'Connor added that the foreclosure crisis doesn't appear to have crested in our state. “You can be sure that whatever schemes exist today to separate homeowners from their homes, those schemes will continue and possibly multiply because the foreclosure problem in Ohio is not going away anytime soon” stated Justice O'Connor.

**FEDERAL BUREAU OF INVESTIGATIONS- MORTGAGE FRAUD MAP June 2010**





## **2009 OHIO SUPREME COURT FORECLOSURE FILING INFORMATION**

The rate of foreclosures **increased in the State of Ohio by 3.8% in 2009**. Foreclosure rates have decreased or have come to a “holding point” in some neighboring jurisdictions, yet have **skyrocketed** in Troy and Miami County as well as in neighboring Shelby County. It is important to examine why and what can be done to produce a more favorable climate and outcome for City of Troy / Miami County Residents.

An examination of data and comparisons concerning foreclosures in Miami County / City of Troy Ohio was conducted with the following results followed by conclusive explanations why each neighboring jurisdiction’s result is different:

### **MIAMI COUNTY/CITYOF TROY**

- Miami County’s foreclosure rate **INCREASED 25.6% IN 2009** from 590 to 741 foreclosure filings
- The previous year, **2008**, Miami County foreclosure rates only **INCREASED 2.5% in 2008** from 577-590

### **SHELBY COUNTY**

- Shelby County’s foreclosure rate **INCREASED 21.2% in 2009** from 250 to 303 foreclosure filings
- In **2008**, filings **DECREASED 1.5%** from 254 to 250

### **DARKE COUNTY**

- Darke County’s foreclosure rate **INCREASED 0.3% IN 2009** from 310 to 311 filings
- In **2008**, Darke County had a **14% INCREASE** in foreclosure filings from 273 to 310 filings

### **PREBLE COUNTY**

- Preble County’s foreclosure rate **DECREASED -1.1% in 2009** from 374 to 370 foreclosure filings
- In **2008**, their foreclosure rate **INCREASED 7.5%** from 348 to 374 foreclosure filings

### **CLARK COUNTY**

- Clark County’s foreclosure rate **DECREASED -1.8% in 2009** from 1124 to 1104 foreclosure filings
- In **2008**, filings **INCREASED 6%** from 1059 to 1124

## **2009 OHIO SUPREME COURT FORECLOSURE FILING INFORMATION (Cont'd)**

### **MONTGOMERY COUNTY**

- Montgomery County's foreclosure rate **DECREASED -9.5% IN 2009** from 5194 to 4703 foreclosure filings
- In **2008**, Montgomery County had a **2.6% INCREASE** from 5063 to 5194 foreclosure filings

### **Why are these results similar or different?**

All six counties compared have experienced similar jumps in unemployment rates.

Both Montgomery and Clark County have had established foreclosure intervention coalitions and programs for many years now and have become experienced and successful in stemming the tide of foreclosures.

Montgomery County, specifically Dayton, is the base of the Miami Valley Fair Housing Center's Predatory Lending Solutions Project. The Miami Valley Fair Housing Center's team of legal experts has had a great deal of success in prosecuting mortgage fraud and discriminatory mortgage lending and works with housing counseling providers assisting to solve difficult cases and keep people in their homes. Miami Valley Fair Housing Center serves Montgomery County.

Miami Valley Fair Housing's Website states the following;

- "If you feel you are a victim of predatory lending and live in Montgomery County, Ohio, call the Predatory Lending Solutions hotline at 937-222-9671 if you are currently in foreclosure. If you are not currently in foreclosure, you should call the HomeOwnership Center of Greater Dayton at 937-853-1600."

Darke County and Preble County receive foreclosure intervention assistance from a community development corporation based in Preble County called the H.I.T. Foundation, Housing Is the Foundation. Darke County was additionally designated by the Ohio Department of Developments as an NSP2 recipient due to the it's high cost low equity mortgages.

The H.I.T. Foundation has partnered with and receives funding, technical training as well as legal counsel assistance from ESEOP, Empowering and Strengthening Ohio's People. ESEOP initially provided funding assistance to cover half of the salaries of two full time staff people; an intake specialist and a foreclosure intervention specialist.

The East Side Organizing Project (ESOP) was founded in 1993 to create organized leadership around issues impacting neighborhood life in the Cleveland area. In the late 1990's, ESOP began to shift its focus toward predatory lending and foreclosures. Over the past several years, much of ESOP's work has focused on foreclosure prevention in Cuyahoga County. ESOP is currently continuing to expand its efforts throughout the state of Ohio. In August of 2007, ESOP changed its name to "Empowering and Strengthening Ohio's People" to emphasize the new state-wide focus.

ESOP, Empowering and Strengthening Ohio's People has gained respect and notoriety through its lengthy and tireless dedication to combating foreclosures in Ohio. ESOP has signed agreements of terms and conduct with the vast majority of mortgage lenders, servicers and banks which makes successful expectations of foreclosure intervention possible. The following highlights some of ESOP's successes contributing to why Darke and Preble Counties have been served well and have not experienced the foreclosure crisis any worse than they have.

- September, 2002: ESOP negotiates a 5-year CRA agreement with Charter One bank. This was the first CRA agreement between a bank and a community group in Cuyahoga County in over a decade.
- November, 2003: ESOP partners with Third Federal Savings and Loan to launch the "Home Today" loan program.
- March, 2004: ESOP leads negotiations between National Training and Information Center (NTIC) and Select Portfolio Servicing (formerly known as Fairbanks Capital Corporation) that results in a written partnership for a loan review and repair process.
- July, 2005: ESOP launches a campaign against Ameriquest Mortgage and its affiliate, Argent Mortgage. As a result, a fair lending agreement is signed with these companies in early 2006.
- February, 2006: ESOP launches a campaign against Countrywide Home Loans
- March, 2007: ESOP board president Inez Killingsworth testifies before the U.S. House of Representatives Domestic Policy Sub-Committee on the abuses of the lending industry and the effects of the subprime lending crisis on Cleveland communities.
- December, 2007: ESOP meets with Countrywide executives and NTIC affiliates to begin the negotiation process for a fair lending agreement.

Miami and Shelby Counties fared far worse than their neighboring counties. A common theme of the two counties is the lack of a foreclosure prevention or default intervention service provider with strong legal representation resources that can be utilized in those jurisdictions.

In March of 2007, Ohio Governor Strickland established the Foreclosure Prevention Task Force to provide a unified and coordinated statewide response to the dramatic increase in foreclosures in Ohio. The Governor charged task force to create the appropriate model of foreclosure prevention, intervention and strategies to assist distressed mortgages. The Task Force report and recommendations submitted to the Governor on September 10, 2007

OHFA and the ODOD Office of Housing and Community Partnerships launched the Ohio Home Rescue Fund Program in late 2007, with the Task Force Recommendation. This program provides financial assistance for homeowners struggling to make their mortgage payments due to unforeseen, temporary life circumstances and provided \$2 million dollars to 24 agencies in Ohio. The agency designated to serve Shelby County was/is Consumer Credit Counseling Services of the Miami Valley. The agency designated to serve Miami County was/is the St. Mary's Development Corporation's HomeOwnership Center of Greater Dayton.

Ohio then quickly created the Save the Dream Ohio initiative that launched the Save the Dream Ohio Hotline and website March 13, 2008. The goal of the Save the Dream Ohio Hotline is to provide one unified source to connect Ohioans with HUD-certified housing counseling agencies receiving federal and state funds to operate and additionally offer legal assistance

through its call center. The Save the Dream Taskforce Ohio has established a strong, multi-agency foreclosure prevention effort that involves outreach, foreclosure counseling, legal assistance, foreclosure mediation, and neighborhood stabilization.

Both the Consumer Credit Counseling Services of the Miami Valley and St. Mary's Development Corporation's HomeOwnership Center of Greater Dayton are funded to provide services via the Save the Dream Ohio Initiative. The Save the Dream Hotline number is 888.404.4674.

The first local "Save the Dream Taskforce Meeting" was facilitated by this fair housing advocate as part of the City of Troy's FY '07 Fair Housing Training Educational Outreach Program on June 20, 2008 to address foreclosures / predatory lending as an impediment to fair housing choice. Scott Brown, of the Ohio Treasurer's office was the guest speaker presenter at the event. A second "Save the Dream" local taskforce meeting took place in Tipp City in August of 2008, with Susan Cho of the Ohio Attorney General's Office as the trainer.

In late 2008 or early 2009, Troy Community Works contracted for services with the HomeOwnership Center of Greater Dayton to come to Troy to provide foreclosure intervention services on a part time basis.

It is important to note that Montgomery County Residents are directed to contact the HomeOwnership Center of Greater Dayton only early on, when they are "at risk" of foreclosure; when they are beginning to get behind on their mortgage, prior to a foreclosure filing which may be initiated if they become 90 days or more late on their mortgage. Montgomery County Residents are directed to contact the Miami Valley Fair Housing Center if they are already actually in foreclosure; that is if a foreclosure filing has been initiated against them.

No marketing or outreach effort offering foreclosure assistance was or has been orchestrated by the HomeOwnership Center of Greater Dayton directed to City of Troy/ Miami County Residents, despite the fact that organization received Ohio Home Rescue Fund Program dollars made available by OHFA and the ODOD Office of Housing and Community Partnerships as early as 2007 to serve this jurisdiction.

Shelby County utilizes Consumer Credit Counseling Services of the Miami Valley as a housing counselor and foreclosure prevention / mortgage default program provider. Consumer Credit Counseling Services of the Miami Valley is a program of Graceworks Lutheran Services headquartered in Dayton, Ohio, with satellite locations in Sidney, Springfield, Ohio and Richmond, Indiana. Consumer Credit Counseling Services of the Miami Valley is a National Foreclosure Mitigation Counseling (NFMC) grantee through Neighbor Works America and a Certified HUD Housing Counseling Agency.

Throughout 2009, the City of Troy / Miami County was offered local foreclosure intervention assistance through Troy Community Works via the HomeOwnership Center of Greater Dayton. The Troy Community Works brochure provided that TCW "Operates a foreclosure assistance center, serving Miami County in Troy Ohio, offering free financial counseling and transition assistance". Residents of Miami County City of Troy were guided to call the local TCW office number or the HomeOwnership Center of Greater Dayton's direct line.

The HomeOwnership Center of Greater Dayton is a certified HUD approved counseling agency that has access to federal and state funding designed to assist people at risk of foreclosure to pay closing costs for loan to modifications, assist in catching up mortgage payments due to temporary economic set backs and etc., however, their programming was not designed to include providing the service of a legal component. Whereas the HomeOwnership Center of Greater Dayton has the ability to refer residents of Montgomery County that have waited until foreclosure proceedings have started to the Miami Valley Fair Housing Predatory Lending Project, Miami County/ City of Troy are not served by that agency.

In August of 2009, Troy Community Works!(TCW) hired a part time, 15 to 20 hour per week comprehensive housing counselor to be trained to serve in the Troy office a minimum of two days per week. TCW's contract with the HomeOwnership Center of Greater Dayton ended in December of 2009 and was not renewed.

For FY 2009 and currently, City of Troy / Miami County Residents are being referred primarily to the Troy Community Works foreclosure intervention counseling program. The program is not HUD certified and does not have access to funding to assist in foreclosure intervention that HUD certified status requires. Federal initiatives such as the Making Home Affordable Program and additional supplemental federal funds as well as funding from the Ohio Housing Finance Agency or the Ohio Department of Development and the State of Ohio SAVE THE DREAM Initiative are not available to assist homeowners in foreclosure or in foreclosure or at risk of foreclosure.

City of Troy / Miami County may become more at risk of becoming victims of Foreclosure Rescue Scams and / or succumbing to foreclosure when they are confused about where to call for help, or when they don't receive the assistance they need from the foreclosure assistance provider agency they contact. Consumers are inundated with information not only about new legitimate HUD based assistance programs, but also predatory mortgage foreclosure schemes. Without one solid source that can actually deliver credible and dependable mortgage foreclosure assistance, citizens are prone to seek out sources claiming to provide assistance that are actually fraudulent in nature.

### **IMPEDIMENT # 3 - / Lending / Possible Fraud and Foreclosure Intervention Scams / Foreclosures**

- **SUGGESTED ACTION STEPS**

It is this advocates recommendation that the City of Troy once again begin to refer all citizens to the Ohio "Save the Dream Ohio" (SDO) foreclosure prevention effort hotline at 1-888-404-4674 go on line and apply at <http://savethedreamohio.gov>.

The "Save the Dream Ohio" SDO, effort is a State of Ohio based multi department and agency initiative. In addition to partnering with the Ohio Housing Finance Agency (OHFA), all Ohio Legal Aid Services are tied to the initiative. The Ohio Supreme Court, the Attorney Generals Office, the Ohio Department of Development, the Ohio Department of Commerce are all SDO Partners. Legal Services as well as monetary assistance and solid sustainable mortgage modifications are provided through this resource for free to City of Troy / Miami County Residents.

When people call or apply on line, they are directed to assistance generally within 30 miles of where they live. All assistance is provided at no cost by only HUD approved counseling agencies and attorneys with specific updated training in the area of real estate foreclosures and short sales.

It is important to note that this is a single trusted source for help. The foreclosure rescue scams in Ohio are one of the most urgent issues that needs to be documented to be remedied and the SAVE THE DREAM OHIO Initiative is equipped to begin addressing this problem.

As of September 27, 2010, the SAVE THE DREAM OHIO unveiled the "RESTORING STABILITY" Program. Ohio is only one of five states in the nation to receive HUD dollars to assist in stemming the tide of foreclosures inundating the state. A hefty \$320 million was recently poured into this initiative to assist Ohio Residents.

The RESTORING STABILITY Initiative can assist City of Troy Homeowners who have suffered a loss of income that have not been able to recoup that full income. Additionally, the initiative can directly pay down mortgages, so Troy Residents who are experiencing significant loss in home value can refinance into sustainable mortgages.

RESTORING STABILITY programs include:

- **Rescue Payment Assistance:** Provides a payment to a participating homeowner's mortgage servicer to help bring the homeowner current on his or her delinquent mortgage.
- **Partial Mortgage Payment Assistance:** Provides partial mortgage payments while unemployed homeowners search for a job or participate in job training.
- **Modification Assistance with Principal Reduction:** Provides a payment incentive to mortgage servicers to reduce a participating homeowner's mortgage principal to the level necessary to achieve a loan modification and affordable monthly mortgage payments.
- **Transitional Assistance:** Provides homeowners who cannot sustain homeownership with an alternative to foreclosure by offering an incentive to mortgage servicers to complete short sales and deed-in-lieu agreements. Transitional Assistance allows homeowners to exit their homes gracefully.

## CITY OF TROY ACTION PLAN FY 2010

Impediment	Action - FY 2010	Action- FY2010- beyond
<b>ECONOMIC OPPORTUNITY</b>	The City of Troy will continue to pursue and expand its efforts to enhance the availability of economic opportunities for members of protected classes.	Ongoing-  Both traditional and non traditional forms of employment and training should be pursued. Additional opportunities may be explored and promoted to mitigate this impediment including, but not limited to, supporting progress in local initiatives.
<b>TRANSPORTATION</b>	Continue to acknowledge the correlation between fair housing choice and transportation and participate in Consolidated Planning and other initiatives that address this impediment.	Ongoing- Continue to encourage and/or facilitate a variety of community and regional collaboration efforts
<b>HOUSING AFFORDABILITY AND AVAILABILITY</b>	Continue community collaboration and effort in identifying ways to alleviate these impediments including, but not limited to participating in the Miami County Continuum of Care * **PROMOTE ENERGY ASSISTANCE / WEATHERIZATION - serving to improve housing affordability by cutting energy costs for both renters and owners	Possibly apply for and utilize CHIP HOME and / or other community funds to increase Fair Housing Choice / HomeOwnership, and Maintain / Improve Current HOUSING STOCK , explore and meet community needs identified through the Miami County Continuum of Care.  ONGOING
<b>LACK OF HOME LENDING PRODUCTS for PURCHASE AND REFINANCE - PREDATORY LENDING / FRAUD and FORECLOSURE INTERVENTION SCAMS/ FORECLOSURES</b>	Promote SAVE THE DREAM OHIO Initiatives such as the RESTORING STABILITY PROGRAM	In addition to utilizing and promoting state and federal initiatives and programming; seek ways to establish effective relationships with local lenders in the case of possible CHIP / HOME Programming.  Enhance public and private affirmative marketing efforts
<b>FAIR HOUSING ACT INITIATIVES</b>	Continue to strive for excellence in provision of the State of Ohio four program components and continue to facilitate community partnerships in reaching Fair Housing related goals and initiatives.	Advocate for and encourage Programming and Initiatives above and beyond minimum requirements.  REQUIRE A DETAILED CALL LOG WITH NATURE OF CALLS TO BE SUBMITTED TO THE CITY OF TROY FOR COMPLAINT / REFERRAL SERVICES

## **APPENDIX A- MIAMI COUNTY / CITY OF TROY ACTION PLAN FY 2007 – 2012**

### **Miami County Fair Housing Program Five Year Action Plan FY'07 (September 1, 2007- August 31, 2008) through 2012**

- Continue to strive for excellence in provision of the four standard State of Ohio Fair Housing Program components designed specifically for compliance with Section 109 of the Housing and Community Development Act of 1974 (42 USC 5301 et. Seq.) and the Cranston-Gonzales National Affordable Housing Act (42 USC 130 Sections 202-290).
- Continue to facilitate and utilize the Miami County Fair Housing Committee in affirmatively furthering Fair Housing per Title VIII of the Civil Rights Act of 1968 as amended: otherwise known as the Federal Fair Housing Act (42 USC Sec. 3601-3619).
- Initiate education and compliance when applicable, for the seven additional federal laws and six executive orders directly mandating Fair Housing compliance within the jurisdiction and laws referencing Fair Housing such as the Home Ownership Equity Protection Act of 1994 (HOEPA) (15 USC 1639) within scope and capacity.
- Advocate for a financial education/homebuyer counseling program or service with a home mortgage default-counseling component to be established for citizens of Miami County to at least, combat the effects of predatory lending practices.
- Continue to focus efforts on providing educational outreach to High School Seniors in Miami County to promote community baseline knowledge of the Fair Housing Act.
- Advocate for housing projects and activities that serve members of protected classes that are also consistent with the U.S. Department of Housing and Urban Development's (HUD) mission and strategic goals for 2006 – 2011
- Inquire as to the performance of financial institutions operating in Miami County, as required for the Analysis of Impediments to Fair Housing Choice Report, pertaining to Community Reinvestment Act (CRA) mandated requirements (12 USC 2901 Implemented; 12 CFR parts 25, 228, 345 and 563e).



